

UNITED STATES PATENT AND TRADEMARK OFFICE  
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BEFORE THE PATENT TRIAL AND APPEAL BOARD  
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Taiwan Semiconductor Manufacturing Company, Ltd.  
Petitioner

v.

GODO KAISHA IP BRIDGE 1  
Patent Owner  
\_\_\_\_\_

Case IPR2016-01376  
Patent 6,197,696  
\_\_\_\_\_

**PATENT OWNER'S PRELIMINARY RESPONSE  
UNDER 37 C.F.R. § 42.107**

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### LIST OF EXHIBITS

Exhibit	Description
EX2001	N. Sclater & J. Markus, McGraw-Hill Electronics Dictionary (6th ed. 1997) (excerpted)
EX2002	R. F. Graf, Modern Dictionary of Electronics (6th ed. 1984) (excerpted)
EX2003	R. F. Graf, Modern Dictionary of Electronics (7th ed. 1999) (excerpted)
EX2004	S. M. Kaplan, Wiley Electrical and Electronics Engineering Dictionary (2004) (excerpted)
EX2005	October 7, 2016 Preliminary Constructions, <i>Godo Kaisha IP Bridge 1 v. Broadcom Ltd., et al.</i> , Case. No. 2:16-cv-134
EX2006	Declaration of Seung Woo Hur

Pursuant to 37 C.F.R. § 42.107,<sup>1</sup> Patent Owner Godo Kaisha IP Bridge 1 (“IP Bridge”) submits this Preliminary Response to the above-captioned Petition for *Inter Partes* Review of U.S. Patent No. 6,197,696 challenging independent claim 13 and its dependent claim 15 (“Pet.,” Paper 2), which should be denied in its entirety.

## I. Introduction

On its face, Petitioner Taiwan Semiconductor Manufacturing Company, Ltd.’s (“Petitioner’s”) submission fails to provide the Board with the basic evidence required to institute any *inter partes* review. If the Board nonetheless institutes trial on any of the challenged claims, Patent Owner will address in detail in its § 42.120 Response the numerous substantive errors and shortcomings that underlie each of Petitioner’s arguments and its purported evidence. In this paper, however, where any testimonial evidence raising an issue of material fact “will be viewed in the light most favorable to the petitioner” (Rule §42.108), Patent Owner addresses only the meaning of one of the challenged claims’ pertinent terms and the single issue made pertinent by Rule 42.107: Petitioner’s failure to demonstrate, as to *any* of the challenged claims, a reasonable likelihood of success on any

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<sup>1</sup> All emphasis herein is added, and all statutory and regulatory citations are to either 35 U.S.C. or 37 C.F.R., as the context indicates, unless otherwise stated.

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