

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD.,
Petitioner,

v.

GODO KAISHA IP BRIDGE 1,
Patent Owner.

Case IPR2016-01376
Patent 6,197,696 B1

**PETITIONER'S OBJECTIONS TO PATENT OWNER'S EVIDENCE
SUBMITTED DURING THE PRELIMINARY PROCEEDING**

In accordance with 37 C.F.R. § 42.64(b)(1), Petitioner Taiwan Semiconductor Manufacturing Company, Ltd. hereby submits a list of objections to Patent Owner IP Bridge's Exhibit 2004 submitted during the preliminary proceeding, identified in the chart below:

Exhibit Number	Description
2004	S.M. Kaplan, Wiley Electrical and Electronics Engineering Dictionary (2004) (excerpted)

I. Objection to Patent Owner's Exhibit 2004—Irrelevant and Non-Probative Evidence

Patent Owner's Exhibit 2004 is irrelevant to any material facts at issue in these proceedings, and any probative value Patent Owner may try to assign them is substantially outweighed by their tendency to confuse the issues, mislead the Board, waste time, and needlessly present cumulative evidence. Exhibit 2004 is therefore inadmissible under Fed. R. Evid. 401, 402, and 403.

Exhibit 2004, which bears a copyright date of 2004, appears to have been published years after the date of invention (March 23, 1999, *see* Paper 11, at 19–26). It thus provides only “impermissible . . . later knowledge about later art-related facts,” *In re Hogan*, 559 F.2d 595, 605 (CCPA 1977), and is irrelevant.

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Dated: February 1, 2017

Respectfully submitted,

By: /Darren M. Jiron/
Darren M. Jiron
Reg. No. 45,777

Lead Counsel for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), this is to certify that I served a true and correct copy of the **Petitioner's Objections to Patent Owner's Evidence Submitted During the Preliminary Proceeding** by electronic mail, on this 1st day of February, 2017, on counsel of record for the Patent Owner as follows:

J. Steven Baughman
steven.baughman@ropesgray.com

Andrew N. Thomases
andrew.thomases@ropesgray.com

IPBridgeTSMCPTABService@ropesgray.com

Dated: February 1, 2017

By: /Lauren K. Young/
Lauren K. Young
Litigation Legal Assistant
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.