

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 No. IPR2016-01377
Patent Number 6,197,696

Before JUSTIN T. ARBES, MICHAEL J. FITZPATRICK, and
JENNIFER MEYER CHAGNON, *Administrative Patent Judges*.

DECLARATION OF TAKEO OHASHI, Ph.D.

IP Bridge Exhibit 2013

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I, Takeo Ohashi, hereby declare under penalty of perjury under the laws of the United States of America:

I. Qualifications

1. I am currently President and owner of Ohashi High Technology Corporation of New York, New York; a role I have had since July 2001. In my work with Ohashi High Technology Corporation, I translate Japanese patents, technical articles, and business/legal documents and perform interpretations.

2. From 1995 to July 2001, I was a sole proprietor for Ohashi High Technology of New York, New York. In that capacity, I translated Japanese patents, technical articles, and business/legal documents and performed interpretations.

3. I have over 22 years of professional experience as an interpreter and translator, and am well acquainted with the Japanese language and the English language.

4. I received a Bachelors of Engineering degree in Applied Physics from the University of Tokyo in 1980; a Doctor of Philosophy degree in Electrical Engineering from Cornell University in 1985; and a Masters in Business Administration from New York University in 1993. At Cornell University, I worked on epitaxial growths of semiconductors, chip processing such as metal depositions and etching, and photolithography. From 1985 to 1990, I was

employed at IBM East Fishkill facilities and worked in a development team relating to computer chips, including epitaxial growths of semiconductors. A copy of my Curriculum Vitae is attached to this report as Exhibit A.

5. I have been retained on behalf of Patent Owner Godo Kaisha IP Bridge 1 (“IP Bridge” or “Patent Owner”) to offer opinions regarding the translation of paragraphs [0025], [0080], [0094], and [0095] of Japanese Patent Application No. 10-079371 to Aoi, entitled “Method of forming wiring structure,” which I understand has been marked in this proceeding as Exhibit 1013. I have personal knowledge of the facts and opinions set forth in this declaration, I believe them to be true, and if called upon to do so, I would testify competently to them. I have been warned that willful false statements and the like are punishable by fine or imprisonment, or both.

6. I charge an hourly rate of \$100 per hour plus expenses for my work performed in connection with this *Inter Partes* Review. I have received no additional compensation for my work in this *Inter Partes* Review, and my compensation does not depend on the contents of this report, any testimony I provide, or the ultimate outcome of this or any other *Inter Partes* Review.

II. Materials Considered

7. In developing my opinions below, I have considered the following materials:

- Japanese Patent Application No. 10-079371 to Aoi (Exhibit 1013)
- Certified Translation of Japanese Patent Application No. 10-079371 to Aoi (Exhibit 1014)
- Certified Translation of Japanese Patent Application No. 10-079371 to Aoi submitted during the prosecution of European Patent Application No. 99 105 946.0 (Exhibit 2012)
- Kenkyusha's New Japanese-English Dictionary, 4th Edition, 35th Impression (1997) (Exhibit 2021)
- All other materials referenced herein

III. Translation of the Word マスク

8. I have reviewed Japanese Patent Application No. 10-079371, as it is set forth in Exhibit 1013, and translated paragraphs [0080], [0094], and [0095]. I have also reviewed the Certified Translation of Japanese Patent Application No. 10-079371 to Aoi submitted during the prosecution of European Patent Application No. 99 105 946.0 (Exhibit 2012; the "EP Translation"). I agree with the EP Translation of each of those paragraphs. The EP Translation of each of those paragraphs is set forth below (with emphasis added for the reasons discussed below):

9. [0080] "Next, as shown in Figure 13 (c), the second resist pattern 309 is removed and the patterned second organic-containing silicon dioxide film 305A is dry-etched using the mask pattern 308 as a mask, thereby forming openings for forming wiring grooves in the patterned second organic-containing silicon dioxide film 305A. Thereafter, the patterned low-dielectric-constant SOG film 304A is dry-etched using the mask pattern 308 and the patterned second organic-containing

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