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 IPR2016-01378
Patent 6,197,696 B1

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

DECLARATION OF JORDAN M. ROSSEN

I, Jordan M. Rossen, make the following Declaration pursuant to 28 U.S.C. § 1746:

1. I am an attorney with the law firm of Ropes & Gray LLP. I have worked at Ropes & Gray LLP since 2008.

2. I provide this Declaration in connection with Patent Owner's Response to the above-captioned Petition for *Inter Partes* Review of U.S. Patent 6,197,696 B1. Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.

IP Bridge Exhibit 2022

3. **Exhibit 2010** is a true and correct copy of the Transcript of the Deposition of Dr. Smith taken on March 23, 2017. An exhibit label and page numbers have been added to the bottom of this document but no other alterations have been made.

4. **Exhibit 2011** is true and correct copy of a redline comparison of Grill (EX1005) with Grill's Provisional Application (EX1017) that was prepared by Dr. Alexander Glew. An exhibit label and page numbers have been added to the bottom of this document but no other alterations have been made.

5. **Exhibit 2012** is a true and correct copy of the certified translation of Japanese Patent Application No. 7411290311 to Aoi, filed on March 26, 1998 by Matsushita Electric Industrial Co., Ltd., which was downloaded at my direction on April 11, 2017 from the European Patent Office's Espacenet search page, http://worldwide.espacenet.com, to which all parties have access. An exhibit label and page numbers have been added to the bottom of this document but no other alterations have been made.

6. **Exhibit 2014** is a true and correct copy of an article entitled "Influence of reactor wall conditions on etch processes in inductively coupled fluorocarbon plasmas" published in the Journal of Vacuum Science & Technology A: Vacuum, Surfaces, and Film and dated 1998, which was obtained at my direction on April 13, 2017 from Reprints Desk (http://info.reprintsdesk.com). An

exhibit label and page numbers have been added to the bottom of this document but no other alterations have been made.

7. **Exhibit 2015** is a true and correct copy of an excerpt from Handbook of VLSI Microlithography, Second Edition, Principles, Technology, and Applications, published by Noyes Publications/William Andrew Publishing, LLC, in 2001, which was obtained at my direction on April 13, 2017 from the Kresge Engineering Library at the University of California-Berkeley. An exhibit label and page numbers have been added to the bottom of this document but no other alterations have been made.

8. **Exhibit 2016** is a true and correct copy of an excerpt from Silicon VLSI Technology Fundamentals, Practice and Modeling by James D. Plummer, et al., published by Prentice Hall in 2000, which was obtained at my direction on April 13, 2017 from the Kresge Engineering Library at the University of California-Berkeley. An exhibit label and page numbers have been added to the bottom of this document but no other alterations have been made.

9. **Exhibit 2017** is a true and correct copy of an excerpt from Microlithography: Science and Technology by James R. Sheats and Bruce W. Smith, published by Marcel Dekker, Inc. in 1998, which was obtained at my direction on April 11, 2017 from the Kresge Engineering Library at the University

of California-Berkeley. An exhibit label and page numbers have been added to the bottom of this document but no other alterations have been made.

10. **Exhibit 2018** is a true and correct copy of Deposition Exhibit No. 3 from the Deposition of Dr. Smith taken on March 23, 2017. It contains an excerpt **(Chapter 12)** from Microlithography: Science and Technology by Kazuaki Suzuki and Bruce W. Smith, published by CRC Press Taylor & Francis Group in 2007, which was obtained at my direction on February 27, 2017 from the Kresge Engineering Library at the University of California-Berkeley. An exhibit label and page numbers have been added to the bottom of this document but no other alterations have been made.

11. **Exhibit 2019** is a true and correct copy of Deposition Exhibit No. 9 from the Deposition of Dr. Smith taken on March 23, 2017. It contains an excerpt **(Chapter 11)** from Microlithography: Science and Technology by Kazuaki Suzuki and Bruce W. Smith, published by CRC Press Taylor & Francis Group in 2007, which was obtained at my direction on February 27, 2017 from the Kresge Engineering Library at the University of California-Berkeley. An exhibit label and page numbers have been added to the bottom of this document but no other alterations have been made.

12. **Exhibit 2020** is a true and correct copy of an excerpt from Silicon Processing for the VLSI Era Vol. 1 by S. Wolf and R.N. Tauber , published by the

Lattice Press in 1986, which was obtained at my direction on April 13, 2017 from the Kresge Engineering Library at the University of California-Berkeley. An exhibit label and page numbers have been added to the bottom of this document but no other alterations have been made.

13. **Exhibit 2021** is a true and correct copy of an excerpt from Kenkyusha's New Japanese-English Dictionary, Fourth Edition, 35th Impression, published by Kenkyusha Ltd. in 1997, which was obtained at my direction on April 14, 2017 from The Ropes & Gray LLP Library in New York. An exhibit label and page numbers have been added to the bottom of this document but no other alterations have been made.

14. I make this declaration of my own personal knowledge. If called to testify as to the truth of the matters stated herein, I could and would testify competently.

15. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14th day of April 2017 in Washington D.C.

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