

# Patent Owner Godo Kaisha IP Bridge 1's Demonstrative Slides

***Taiwan Semiconductor Manufacturing Company, Ltd. and  
GlobalFoundries U.S., Inc.***

***v.  
Godo Kaisha IP Bridge 1***

***Inter Partes Review of U.S. Patent No. 6,197,696***

IPR2016-01376, -01377, -01378, -01379

Patent Trial and Appeal Board

United States Patent and Trademark Office

## Table of Contents

### Title

#### Claim Construction

“using the [designated layer[s]] as a mask” ('696 claims 10, 13)

#### Grill in View of Aoyama [and Wetzel]: Grill Is Not Prior Art to the '696 Patent

Claims 10 and 13 of the '696 Are Entitled to their Foreign Priority Date

Grill Cannot Claim Priority to its Provisional Filing Date

#### Grill in View of Aoyama [and Wetzel] Does Not Render Obvious All Challenged Claims

Proposed Combinations Render Grill Unsatisfactory for its Intended Purpose of Forming a Dual Relief Pattern

Grill Teaches Away from Aoyama's Use of Carbon Based Etch Stopper Layers

Grill Teaches Away from Aoyama's Use of Varying Photoresist Profile Thicknesses

#### Beyond the Scope of Proper Reply and Petitioners' Motion to Exclude

## Table of Abbreviations

Abbreviation	Description
Challenged Claims	'696 Patent Claims 10-12, 13-15
P1	IPR2016-01376, Paper 2, Petition for <i>Inter Partes</i> Review of U.S. 6,197,696
P2	IPR2016-01377, Paper 2, Petition for <i>Inter Partes</i> Review of U.S. 6,197,696
P3	IPR2016-01378, Paper 2, Petition for <i>Inter Partes</i> Review of U.S. 6,197,696
P4	IPR2016-01379, Paper 2, Petition for <i>Inter Partes</i> Review of U.S. 6,197,696
Smith1	IPR2016-01376, Ex1002, Declaration of Bruce Smith, Ph.D in Support of for <i>Inter Partes</i> Review of U.S. Patent No. 6,197,696
Smith2	IPR2016-01377, Ex1002, Declaration of Bruce Smith, Ph.D in Support of for <i>Inter Partes</i> Review of U.S. Patent No. 6,197,696
Smith3	IPR2016-01378, Ex1002, Declaration of Bruce Smith, Ph.D in Support of for <i>Inter Partes</i> Review of U.S. Patent No. 6,197,696
Smith4	IPR2016-01379, Ex1002, Declaration of Bruce Smith, Ph.D in Support of for <i>Inter Partes</i> Review of U.S. Patent No. 6,197,696
POR1	IPR2016-01376, Paper 19, Patent Owner's Response
POR2	IPR2016-01377, Paper 19, Patent Owner's Response
POR3	IPR2016-01378, Paper 19, Patent Owner's Response

## Table of Abbreviations

Abbreviation	Description
Glew1	IPR2016-01376, Ex2009, Expert Declaration of Alexander Glew, Ph.D in of Patent Owner's Response to Petition for <i>Inter Partes</i> Review of U.S. 6
Glew2	IPR2016-01377, Ex2009, Expert Declaration of Alexander Glew, Ph.D in of Patent Owner's Response to Petition for <i>Inter Partes</i> Review of U.S. 6
Glew3	IPR2016-01378, Ex2009, Expert Declaration of Alexander Glew, Ph.D in of Patent Owner's Response to Petition for <i>Inter Partes</i> Review of U.S. 6
Glew4	IPR2016-01379, Ex2009, Expert Declaration of Alexander Glew, Ph.D in of Patent Owner's Response to Petition for <i>Inter Partes</i> Review of U.S. 6
Reply1	IPR2016-01376, Paper 26, Petitioners' Reply
Reply2	IPR2016-01377, Paper 26, Petitioners' Reply
Reply3	IPR2016-01378, Paper 26, Petitioners' Reply
Reply4	IPR2016-01379, Paper 26, Petitioners' Reply
SmithReply1	IPR2016-01376, Ex1049, Rebuttal Declaration of Bruce Smith, Ph.D in S Petition for <i>Inter Partes</i> Review of U.S. Patent No. 6,197,696
SmithReply2	IPR2016-01377, Ex1050, Rebuttal Declaration of Bruce Smith, Ph.D in S Petition for <i>Inter Partes</i> Review of U.S. Patent No. 6,197,696
SmithReply3	IPR2016-01378, Ex1050, Rebuttal Declaration of Bruce Smith, Ph.D in S Petition for <i>Inter Partes</i> Review of U.S. Patent No. 6,197,696
SmithReply4	IPR2016-01379, Ex1050, Rebuttal Declaration of Bruce Smith, Ph.D in S

## Table of Abbreviations

Abbreviation	Description
Observations1	IPR2016-01376, Paper 34, Patent Owner's Motion for Observations on Examination of Bruce Smith, Ph.D
Observations2	IPR2016-01377, Paper 34, Patent Owner's Motion for Observations on Examination of Bruce Smith, Ph.D
Observations3	IPR2016-01378, Paper 34, Patent Owner's Motion for Observations on Examination of Bruce Smith, Ph.D
Observations4	IPR2016-01379, Paper 34, Patent Owner's Motion for Observations on Examination of Bruce Smith, Ph.D
MTE1	IPR2016-01376, Paper 30, Petitioner's Motion to Exclude Evidence
MTE2	IPR2016-01377, Paper 30, Petitioner's Motion to Exclude Evidence
MTE3	IPR2016-01378, Paper 30, Petitioner's Motion to Exclude Evidence
MTE4	IPR2016-01379, Paper 30, Petitioner's Motion to Exclude Evidence
Opp1	IPR2016-01376, Paper 37, Patent Owner's Opposition to Petitioner's Motion to Exclude Evidence
Opp2	IPR2016-01377, Paper 37, Patent Owner's Opposition to Petitioner's Motion to Exclude Evidence
Opp3	IPR2016-01378, Paper 37, Patent Owner's Opposition to Petitioner's Motion to Exclude Evidence
Opp4	IPR2016-01379, Paper 37, Patent Owner's Opposition to Petitioner's Motion to Exclude Evidence

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