

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. and  
GLOBALFOUNDRIES U.S. INC.,  
Petitioners,

v.

GODO KAISHA IP BRIDGE 1,  
Patent Owner.

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Case No. IPR2016-01378<sup>1</sup>  
Patent Number 6,197,696

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

**PATENT OWNER'S IDENTIFICATION OF ARGUMENTS EXCEEDING  
THE PROPER SCOPE OF REPLY**

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<sup>1</sup> GlobalFoundries U.S. Inc., who filed Petition IPR2017-00923, has been joined as a petitioner in this proceeding.

Pursuant to the Board’s August 18, 2017, email authorizing this paper, Patent Owner Godo Kaisha IP Bridge 1 identifies the following portions of Petitioner’s Reply (Paper 26) that exceed the proper scope of reply relative to Patent Owner’s Response, Paper 19 (“POR”):<sup>2</sup>

1. Petition lacked priority argument: Reply 14:6-22:15; Ex. 1037; Ex. 1038; Ex. 1039; Ex. 1050 ¶¶37-54.
2. New priority arguments: Reply at 17 (sentence beginning “Layer 58...” and the citation that follows), 19 (sentence beginning “Photoresist layer 62 ...” and the citations that follow), 21:3-14; Ex. 1037; Ex. 1038; Ex. 1039; Ex. 1050 ¶¶46-52.
3. New combination/success arguments: Reply 22:16-23:2; Ex. 1040; Ex. 1041.
4. New combination/success arguments: Reply 27:15-28:5; Ex. 1040; Ex. 1041; Ex. 1050 ¶¶66-68.

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<sup>2</sup> Citations to Petitioner’s Reply are in the format of page:lines.

Respectfully submitted by:

Dated: August 23, 2017

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that this PATENT OWNER'S IDENTIFICATION OF ARGUMENTS EXCEEDING THE PROPER SCOPE OF REPLY was served by filing this document through the Patent Trial and Appeal Board PTAB E2E, as well as providing a courtesy copy via e-mail to the following attorneys of record for the Petitioner listed below:

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