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 IPR2016-01379 Patent 6,197,696

PATENT OWNER'S PRELIMINARY RESPONSE UNDER 37 C.F.R. § 42.107



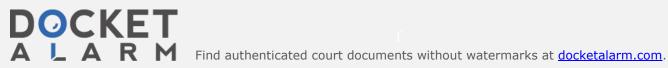
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	Α.	The '696 patent is entitled to its claimed priority date of March 26, 1998					
		1.	Step 10(h) – "removing the first resist pattern and then forming a second resist pattern on the fourth insulating film and the mask pattern, the second resist pattern having openings for forming contact holes"				
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		1.	Petitioner never attempts to argue that Grill is entitled to the priority date of the '628 application in the Petition22	2			
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		(c)	Dr. Smith's opinions are not credible because they are based on problems inapplicable to the relevant embodiments			
	3.	writt	ioner fails to show that the '628 patent application provides en description support for the Grill subject matter alleged sclose claim 10 of the '696 patent39			
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V.		Petitioner fails to demonstrate that Grill discloses or renders obvious "dryetching the third insulating film"				
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VII.	Conclusion		55			



LIST OF EXHIBITS

Exhibit	Description
EX2001	N. Sclater & J. Markus, McGraw-Hill Electronics Dictionary
	(6th ed. 1997) (excerpted)
EX2002	R. F. Graf, Modern Dictionary of Electronics (6th ed. 1984)
	(excerpted)
EX2003	R. F. Graf, Modern Dictionary of Electronics (7th ed. 1999)
	(excerpted)
EX2004	S. M. Kaplan, Wiley Electrical and Electronics Engineering
	Dictionary (2004) (excerpted)
EX2005	October 7, 2016 Preliminary Constructions, Godo Kaisha IP
	Bridge 1 v. Broadcom Ltd., et al., Case. No. 2:16-cv-134
EX2006	Declaration of Seung Woo Hur



Pursuant to 37 C.F.R. § 42.107, ¹ Patent Owner Godo Kaisha IP Bridge 1 ("IP Bridge") submits this Preliminary Response to the above-captioned Petition for *Inter Partes* Review of U.S. Patent No. 6,197,696 challenging independent claim 10 and its dependent claim 12 ("Pet.," Paper 2), which should be denied in its entirety.

I. Introduction

On its face, Petitioner Taiwan Semiconductor Manufacturing Company, Ltd.'s ("Petitioner's") submission fails to provide the Board with the basic evidence required to institute any *inter partes* review. If the Board nonetheless institutes trial on any of the challenged claims, Patent Owner will address in detail in its § 42.120 Response the numerous substantive errors and shortcomings that underlie each of Petitioner's arguments and its purported evidence. In this paper, however, where any testimonial evidence raising an issue of material fact "will be viewed in the light most favorable to the petitioner" (Rule §42.108), Patent Owner addresses only the meaning of one of the challenged claims' pertinent terms and the single issue made pertinent by Rule 42.107: Petitioner's failure to demonstrate, as to *any* of the challenged claims, a reasonable likelihood of success on any



¹ All emphasis herein is added, and all statutory and regulatory citations are to either 35 U.S.C. or 37 C.F.R., as the context indicates, unless otherwise stated.

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