

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SEMICONDUCTOR COMPONENTS INDUSTRIES, LLC d/b/a  
ON SEMICONDUCTOR  
Petitioner

v.

POWER INTEGRATIONS, INC.  
Patent Owner

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Case IPR2016-01600  
Patent No. 7,834,605

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**PATENT OWNERS'  
PRELIMINARY RESPONSE**

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**LIST OF EXHIBITS**

Exhibit No.	Description
PI 2001	Copy of Agreement and Plan of Merger as between Fairchild and ON Semiconductor filed with the SEC
PI 2002	Press release related to merger between Fairchild and ON Semiconductor
PI 2003	<i>Power Integrations, Inc., v. Fairchild Semiconductor International, Inc. et al.</i> , Case No. 08-309-LPS (D. Del.), Dkt. No. 401
PI 2004	RESERVED
PI 2005	Article about completion of merger between ON Semiconductor and Fairchild
PI 2006	<i>Power Integrations, Inc., v. Fairchild Semiconductor International, Inc. et al.</i> , Case No. 08-309-LPS (D. Del.), Dkt. No. 731
PI 2007	Confidentiality Agreement, dated September 14, 2015
PI 2008	“XYZs of Oscilloscopes,” Tektronix, Inc., © 2000
PI 2009	“Oscilloscope Fundamentals,” Tektronix, Inc., © 2009

## TABLE OF AUTHORITIES

### CASES

<i>Aruze Gaming Macau, Ltd. v. MGT Gaming, Inc.</i> , Case IPR2014-01288, 2015 WL 780607, at *5 (PTAB Feb. 20, 2015) .....	7, 8
<i>In re Morris</i> , 127 F.3d 1048, 1054-55 (Fed. Cir. 1997) .....	29
<i>Int'l Nutrition Co. v. Horphag Research, Ltd.</i> , 220 F.3d 1325, 1329 (Fed. Cir. 2000) .....	6
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<i>Pall Corp. v. Fisher Scientific Co.</i> , 962 F. Supp. 210 (D. Mass. 1997) .....	6
<i>Power Integrations, Inc. v. Fairchild Semiconductor International, Inc. et al.</i> , Case No. 08-309-LPS (D. Del.) .....	1, 7
<i>Synopsys, Inc. v. Mentor Graphics Corp</i> .....	9
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### OTHER AUTHORITIES

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