

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEL CORPORATION, GLOBALFOUNDRIES U.S., INC.,
MICRON TECHNOLOGY, INC. and
SAMSUNG ELECTRONICS COMPANY, LTD.,
Petitioners,

v.

DANIEL L. FLAMM,
Patent Owner.

PTAB Case No. IPR2017-00279¹
Patent No. RE40,264 E

PETITIONERS' REPLY TO PATENT OWNER'S RESPONSE

Claims 13-26 & 64-65

¹ Samsung Electronics Company, Ltd. was joined as a party to this proceeding via a Motion for Joinder in IPR2017-01749.

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UPDATED EXHIBIT LIST

Petitioners' Exhibits	
Exhibit	Description
Ex. 1001	U.S. Patent No. RE40,264 (“264 patent”)
Ex. 1002	U.S. Patent No. 5,605,600 (“Muller”)
Ex. 1003	U.S. Patent No. 5,151,871 (“Matsumura”)
Ex. 1004	U.S. Patent No. 5,226,056 (“Kikuchi”)
Ex. 1005	U.S. Patent No. 6,063,710 (“Kadomura”)
Ex. 1006	Declaration of Dr. John Bravman in Support of Petition for <i>Inter Partes</i> Review of U.S. Patent No. RE40,264
Ex. 1007	U.S. Patent Application No. 08/567,224 (“224 application”)
Ex. 1008	Wright, D.R. et al., <i>A Closed Loop Temperature Control System for a Low-Temperature Etch Chuck</i> , <i>Advanced Techniques for Integrated Processing II</i> , Vol. 1803 (1992), pp. 321–329 (“Wright”)
Ex. 1009	U.S. Patent No. 5,192,849 (“Moslehi ’849”)
Ex. 1010	U.S. Patent No. 3,863,049 (“Hinman”)
Ex. 1011	U.S. Statutory Invention Registration No. H1145 (“Anderson”)
Ex. 1012	U.S. Patent No. 4,331,485 (“Gat”)
Ex. 1013	U.S. Patent No. 5,393,374 (“Sato”)
Ex. 1014	Incropera, Frank P. et al, <i>Fundamentals of Heat and Mass Transfer</i> , Third Edition, 1981 (“Incropera”)
Ex. 1015	CRC Handbook of Chemistry and Physics: A Ready-Reference Book of Chemical and Physical Data, 71st Edition, CRC Press, Inc., 1974 (“CRC Handbook”)

UPDATED EXHIBIT LIST
(continued)

Ex. 1016	PTAB Decision Denying Institution of <i>Inter Partes</i> Review, <i>Lam Research Corp. v. Daniel L. Flamm</i> , IPR2015-01759, Paper 7 (February 24, 2016)
Ex. 1017	PTAB Decision Denying Institution of <i>Inter Partes</i> Review, <i>Lam Research Corp. v. Daniel L. Flamm</i> , IPR2016-00468, Paper 6 (June 30, 2016)
Ex. 1018	PTAB Institution of <i>Inter Partes</i> Review, <i>Lam Research Corp. v. Daniel L. Flamm</i> , IPR2015-01764, Paper 7 (February 24, 2016)
Ex. 1019	Petition for <i>Inter Partes</i> Review, <i>Lam Research Corp. v. Daniel L. Flamm</i> , IPR2015-01764, Paper 1 (August 18, 2015)
Ex. 1020	Declaration of Scott Bennett, Ph.D. regarding Exhibit 1014
Ex. 1021	Declaration of Rachel J. Watters regarding Exhibit 1015
Ex. 1022	Declaration of Rachel J. Watters regarding Exhibit 1008
Ex. 1023	Declaration of Jared Bobrow in Support of Motion for Pro Hac Vice Admission
Ex. 1024	Declaration of Chad Campbell in Support of Motion for Pro Hac Vice Admission
Ex. 1025	Reply Declaration of Dr. John Bravman in Support of Petition for <i>Inter Partes</i> Review of U.S. Patent No. RE40,264 and Reply to Patent Owner's Response
Ex. 1026	PTAB Decision Denying Institution of <i>Inter Partes</i> Review, <i>Lam Research Corp. v. Daniel L. Flamm</i> , IPR2016-00470, Paper 6 (July 1, 2016)
Ex. 1027	Petition for <i>Inter Partes</i> Review, <i>Intel Corp. et al. v. Daniel L. Flamm</i> , IPR2017-00280, Paper 2 (December 2, 2016)
Ex. 1028	Declaration of John Bravman in Support of Petition for <i>Inter Partes</i> Review, <i>Intel Corp. et al. v. Daniel L. Flamm</i> , IPR2017-00280, Ex. 1006 (December 2, 2016)

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