

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. IPR2017-00282¹
Patent No. RE40,264 E

PETITIONERS' REPLY TO PATENT OWNER'S RESPONSE

Claims 56-63 & 70-71

¹ Samsung Electronics Company, Ltd. was joined as a party to this proceeding via a Motion for Joinder in IPR2017-01752.

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UPDATED EXHIBIT LIST

Petitioner's 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. 5,711,849 ("849 patent")
Ex. 1010	U.S. Patent No. 4,992,391 ("Wang")
Ex. 1011	Fischl, D.S. et al., <i>Etching of Tungsten and Tungsten Silicide Films by Chlorine Atoms</i> , <i>J. Electrochemical Soc.: Solid-State Science and Technology</i> , Vol. 135, No. 8 (August 1988), pp. 2016-2019 ("Fischl")
Ex. 1012	U.S. Patent No. 4,331,485 ("Gat")
Ex. 1013	U.S. Patent No. 5,393,374 ("Sato")
Ex. 1014	PTAB Decision Denying Institution of <i>Inter Partes</i> Review, <i>Lam Research Corp. v. Daniel L. Flamm</i> , IPR2016-00469, Paper 6 (July 1, 2016)

UPDATED EXHIBIT LIST
(continued)

Ex. 1015	PTAB Institution of <i>Inter Partes</i> Review, <i>Lam Research Corp. v. Daniel L. Flamm</i> , IPR2015-01768, Paper 7 (February 24, 2016)
Ex. 1016	Petition for <i>Inter Partes</i> Review of U.S. Patent No. RE40,264 E Fourth Petition, <i>Lam Research Corp. v. Daniel L. Flamm</i> , IPR2015-01768, Paper 1 (August 18, 2015)
Ex. 1017	U.S. Patent No. 5,242,536 (“Schoenborn”)
Ex. 1018	U.S. Patent No. 5,174,856 (“Hwang”)
Ex. 1019	Declaration of Rachel J. Watters regarding Exhibit 1008
Ex. 1020	Declaration of Rachel J. Watters regarding Exhibit 1011
Ex. 1021	Declaration of Jared Bobrow in Support of Motion for Pro Hac Vice Admission
Ex. 1022	Declaration of Chad Campbell in Support of Motion for Pro Hac Vice Admission
Ex. 1023	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. 1024	Final Written Decision, <i>Thorley Indus. LLC v. Kolcraft Enter., Inc.</i> , IPR2016-00352, Paper 25 (June 1, 2017)
Ex. 1025	Final Written Decision, <i>inContact, Inc. v. Microlog Corp.</i> , IPR2015-00560, Paper 21 (July 28, 2016)
Ex. 1026	Patent Owner Preliminary Response, <i>Lam Research Corp. v. Daniel L. Flamm</i> , IPR2016-00469, Paper 5 (April 27, 2016)
Ex. 1027	Final Written Decision, <i>Curt G. Joa, Inc. v. Fameccanica.Data S.p.A.</i> , IPR2016-00906, Paper 79 (October 11, 2017)
Ex. 1028	Decision Denying Institution of <i>Inter Partes</i> Review, <i>Kinetic Techs., Inc. v. Skyworks Sols., Inc.</i> , IPR2014-00529, Paper 8 (September 23, 2014)

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