

By: Christopher Frerking ([chris@ntknet.com](mailto:chris@ntknet.com))  
Reg. No. 42,557

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LAM RESEARCH CORP.,

Petitioner

v.

DANIEL L. FLAMM,

Patent Owner

CASE IPR2015-01767  
U.S. Patent No. 6,017,221

**PATENT OWNER'S RESPONSE**

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**EXHIBIT LIST**

Exhibit 2001	DECLARATION OF DANIEL L. FLAMM, Sc.D
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Daniel L. Flamm, Sc.D., the sole inventor and owner of the U.S. Patent No. 6,017,221 (“the ‘221 patent”), through his counsel, submits this response to the instant petition.

## **I. Introduction**

Lam makes two invalidity contentions for the single independent claim of the ‘221 patent; anticipation via either of the Lieberman references (Ex’s 1002 and 1012) and obviousness via either of the Lieberman references in view of the Dible patent (Ex. 1003). As will be demonstrated, neither ground warrants invalidating the ‘221 patent.

### **Claim 1**

The ‘221 patent relates to a process for fabricating a product. Claim 1 is the only independent claim. It claims:

A process for fabricating a product using a plasma source, said process comprising the steps of subjecting a substrate to entities, at least one of said entities emanating from a gaseous discharge excited by a high frequency field from an inductive coupling structure in which a phase portion and an anti-phase portion of capacitive currents coupled from the inductive coupling structure are selectively balanced;

wherein said inductive coupling structure is adjusted using a wave adjustment circuit, said wave adjustment circuit adjusting the phase portion and the anti-phase portion of the capacitively coupled currents.

(Ex. 1001 at 22:58-23:2.)

The claim has five key limitations because of the interdependence of the

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