

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

GLOBALFOUNDRIES U.S. INC.,
Petitioner,

v.

GODO KAISHA IP BRIDGE 1,
Patent Owner.

Case IPR2017-00921
Patent 6,197,696

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

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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, <i>Godo Kaisha IP Bridge 1 v. Broadcom Ltd., et al.</i> , Case. No. 2:16-cv-134
EX2006	Declaration of Jordan M. Rossen

Pursuant to 37 C.F.R. § 42.107,¹ Patent Owner Godo Kaisha IP Bridge 1 (“IP Bridge,” “Patent Owner”) submits this Preliminary Response to the above-captioned Petition for *Inter Partes* Review of U.S. Patent No. 6,197,696 challenging independent claim 13 and its dependent claim 15 (“Pet.,” Paper 2), which should be denied in its entirety. Petitioner GlobalFoundries U.S. Inc. (“Petitioner”) has filed a Motion for Joinder (Paper 3) requesting that this proceeding be joined with IPR2016-01376 (“First TSMC IPR”), which Patent Owner has opposed (Paper 7). In the Motion, Petitioner indicates that the Petition “includes grounds that are essentially the same as the ground instituted in the First TSMC IPR” and that “Petitioner does not seek to alter the grounds upon which the Board has already found support in instituting the First TSMC IPR.” Paper 3 at 1; *see also* Pet. at 60 (“This petition includes the same grounds and exhibits against the ’696 patent as asserted in ... IPR2016-01376, filed by Taiwan Semiconductor Manufacturing Company Limited (“TSMC”), which was instituted on January 18, 2017.”). With the exception of this paragraph, references herein to Petitioner, citations herein to Petition page numbers, and an updated attorney declaration for this proceeding (Exhibit 2006), *this Preliminary Response and the exhibits*

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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