

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TAIWAN SEMICONDUCTOR MANUFACTURING CO., LTD,  
Petitioner,

v.

GODO KAISHA IP BRIDGE 1,  
Patent Owner.

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IPR2017-01841<sup>1</sup>  
Patent 7,893,501

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**PATENT OWNER'S OBJECTIONS TO EVIDENCE SERVED WITH  
PETITIONER'S REPLY**

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<sup>1</sup> Case IPR2017-01842 has been consolidated with this proceeding.

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner submits the following objections to evidence served in connection with the Petitioner's Reply to Patent Owner's Response. These objections have been timely filed and served within five business days of the service of evidence to which the objection is directed.

Exhibit 1025 is a patent (U.S. Patent No. 5,389,810, "Agata"). Patent Owner objects to Exhibit 1025 as new evidence that is not properly included in a reply as it is only cited in Petitioner's Reply to support new arguments. See Paper No. 22 at pp. 10-13. Accordingly, Exhibit 1025 is irrelevant and/or substantially more prejudicial than probative pursuant to F.R.E. 401, 402, and 403

Exhibit 1026 is a patent (U.S. Patent No. 8,618,607, "Rashed"). Patent Owner objects to Exhibit 1026 as new evidence that is not properly included in a reply as it is only cited in Petitioner's Reply to support new arguments. See Paper No. 22 at pp. 10-13. Accordingly, Exhibit 1026 is irrelevant and/or substantially more prejudicial than probative pursuant to F.R.E. 401, 402, and 403. Patent Owner also objects to Exhibit 1026 pursuant to F.R.E. 401, 402, and 403 because Exhibit 1026 issued from an application which was filed on July 2, 2012 (see Exhibit 1026), more than 9 years after the priority date of the '501 Patent. Accordingly, Petitioner has not shown that Rashed has any bearing on claim construction or the knowledge of a POSA at the time of the invention.

Exhibit 1027 is the Reply Declaration of Stanley R. Shanfield, Ph.D.

Several portions of Exhibit 1027 contain new evidence and/or support for new theories that are not properly included in a reply as they are only cited in Petitioner's Reply to support new arguments. Patent Owner objects to the following portions because they are an improper reply and are therefore irrelevant and/or substantially more prejudicial than probative pursuant to F.R.E. 401, 402, and 403.

- Exhibit 1027, ¶ 5 improperly raises a new argument that it would have been obvious to apply Igarashi's teaching of isolation regions to Igarashi's Fifth Embodiment that is only cited in Petitioner's Reply to support new arguments. See Paper No. 22 at p. 3.
- Exhibit 1027, ¶¶ 19, 37-39 improperly raise a new argument that it would have been obvious based on Woerlee to use isolation regions in Igarashi's Fifth Embodiment that is only cited in Petitioner's Reply to support new arguments. See Paper No. 22 at pp. 14, 26, 28.
- Exhibit 1027, ¶ 19 improperly raises a new argument that transistors that do not use isolation regions still have active region because the absence of an isolation region does not signify the absence of an active region that is only cited in Petitioner's Reply to support new arguments. See Paper No. 22 at p. 14.

- Exhibit 1027, ¶ 29 improperly raises a new argument that there is one active region in the TSMC-modified Figure 12 of Igarashi that is only cited in Petitioner's Reply to support new arguments. See Paper No. 22 at pp. 19-20.
- Exhibit 1027, ¶ 16-18 improperly raise a new argument that where two transistors share a drain, both transistors are formed within the same active region that is only cited in Petitioner's Reply to support new arguments. See Paper No. 22 at pp. 10-13. Further, these paragraphs discuss Exhibits 1025 and 1026 which as discussed above are new evidence that is not properly included in a reply.

Furthermore, the discussion of Exhibit 1026 in these paragraphs is irrelevant and/or substantially more prejudicial than probative because Exhibit 1026 issued from an application which was filed more than 9 years after the priority date of the '501 Patent.

Dated: July 13, 2018

Respectfully submitted,  
*Godo Kaisha IP Bridge 1*

By /Gerald B. Hrycyszyn /  
Gerald B. Hrycyszyn, Reg. No. 50,474  
Richard F. Giunta, Reg. No. 36,149  
Edmund J. Walsh, Reg. No. 32,950  
Joshua J. Miller (admitted *pro hac vice*)  
WOLF GREENFIELD & SACKS, P.C.  
600 Atlantic Ave.  
Boston, MA 02210-2206  
Tel: 617-646-8000/Fax: 617-646-8646

**CERTIFICATE OF SERVICE UNDER 37 C.F.R. §42.6 (e)(4)**

I certify that on July 13, 2018 I will cause a copy of the foregoing document to be served via electronic mail, as previously consented to by Petitioner, upon the following:

David L. Cavanaugh      [David.Cavanaugh@wilmerhale.com](mailto:David.Cavanaugh@wilmerhale.com)

Dominic E. Massa        [Dominic.Massa@wilmerhale.com](mailto:Dominic.Massa@wilmerhale.com)

Michael H. Smith        [MichaelH.Smith@wilmerhale.com](mailto:MichaelH.Smith@wilmerhale.com)

Date: July 13, 2018

/MacAulay Rush/

MacAulay Rush

Patent Paralegal

WOLF GREENFIELD & SACKS, P.C.