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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY LTD.
Petitioner

v.

GODO KAISHA IP BRIDGE 1
Patent Owner.

Case IPR2017-01841¹

PETITIONER'S RESPONSE PURSUANT TO JULY 20, 2018 ORDER

¹ Case IPR2017-01842 has been consolidated with this proceeding.

1. The Reply specifically identifies where and how the Patent Owner Response (“POR”) mischaracterizes the Petition (“Pet.”) (*e.g.*, POR at 37), identifies where the Pet. showed that it would have been obvious to form Igarashi’s active region in the substrate 1 in Fig. 12 (*e.g.*, Pet. at 32; *see also id.* at 31), and notes where the Board recognized this in the DI (*e.g.*, DI at 16). The Reply specifically states at 2:9-13 that this section responds to the POR at 37.
2. The Reply simply identifies where and how the POR mischaracterizes the Pet. (*e.g.*, POR at 58), identifies where the Pet. showed that it would have been obvious to use Igarashi’s STI to define the active region of substrate 1 in Fig. 12 (*e.g.*, Pet. at 32; *see also id.* at 31), and notes where the Board recognized this in the DI (*e.g.*, DI at 16). A review of pages 2-3, 13-14, and 25-28 of the Reply, which quote extensively from the Pet., POR, and DI, confirms that the Reply properly responds to the POR and is grounded in the Pet. The Reply specifically states at 26:10 to 27:1 that this section responds to the POR at 58.
3. Page 14 of the Reply responds to the PO’s suggestion that some older devices did not have active regions because they did not use STI (POR at 46) and explains why this example is misleading. The Reply states at 13:6-9 that this section responds to ¶¶112-113 of Dr. Glew’s decl., cited on page 46 of the POR.
4. The Reply at 9-13 and 19-22 responds to the arguments in the POR on pages 14-21, 28-29, 33-36, and 58-74 that Igarashi’s Fig. 12 embodiment does not have a

single large active region or two smaller active regions that satisfy the claims. In response, the Reply confirms that a POSITA would have viewed the region between the two STI as the claimed active region and identifies where this is shown in the Pet. Reply at 19-20 (*citing* Pet. at 25-26). The Reply also confirms in response to the POR that Igarashi discloses the claimed active region under either view and that PO's construction is unduly narrow. Reply at 9-13, 20-22. The Reply specifically states at 9:1-4 and 21:4-22:2 that these arguments respond to POR at 17-18, 33-34, 28-29, and 74. The Reply also responds to PO's mischaracterization of Dr. Shanfield's testimony. Reply at 22-25; *see also* Ex. 2009 at 93:16-20 (clarifying region between STI is an active region, not two active regions); Ex. 2010 at 401:9-402:4 (confirming clarification); *id.* at 408:10-17, 411:7-412:3 (confirming region between STI is the active region); *id.* at 429:12-430:5, 437:11-19 (attempting to clarify and answer confusing questions).

5. As noted for 4., the Reply at 20-21 responds the POR's arguments that Igarashi does not have a single large active region or two smaller active regions that satisfy the claims and confirms Igarashi discloses the active region under either view.

Dated: July 27, 2018

Respectfully Submitted,

/Michael Smith/

Michael H. Smith, Reg. No. 71,190

CERTIFICATE OF SERVICE

I hereby certify that, on July 27, 2018, I caused a true and correct copy of the foregoing materials:

- Petitioner's Response Pursuant to July 20, 2018 Order

to be served via email on the following counsel of record as listed in Patent Owner's Mandatory Notices:

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