

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 REQUEST FOR ORAL ARGUMENT**

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

Patent Owner Godo Kaisha IP Bridge 1 (“Patent Owner”), by and through their attorneys, respectfully requests oral argument, currently scheduled for September 6, 2018. Patent Owner requests a total of 60 minutes to present its arguments for IPR2017-01841.

The oral argument for IPR2017-01843 is also scheduled for September 6, 2018 and involves the same patent—U.S. Patent No. 7,893,501. In IPR2017-01843, Patent Owner is also requesting a total of 60 minutes to present its arguments. If the oral arguments are consolidated for IPR2017-01841 and IPR2017-01843, Patent Owner still requests a total of 120 minutes to present its arguments for both proceedings. Patent Owner requests this amount of time for such a consolidated hearing because the prior art, disputed limitations, and issues in IPR2017-01841 are different from those in IPR2017-01843.

Pursuant to 37 C.F.R § 42.70(a), and without intending to waive any issue not specifically identified, Patent Owner identifies the following issues to be argued:

1. The proper construction of “the MISFET: includes an active region of the semiconductor substrate;”
2. Failure of Petitioner to meet its burden of proving obviousness of claims 1, 4-7, 9–12, 14–19, 21, and 23–25 under 35 U.S.C. § 103(a) in view of Igarashi and Woerlee;

3. Failure of Petitioner to meet its burden of proving obviousness of claim 13 under 35 U.S.C. § 103(a) in view of Igarashi, Woerlee, and Hokazono;
4. Exclusion of Petitioner's improper new arguments in its Reply as identified in Paper No. 27;
  - a. Petitioner's improper new theory that it would have been obvious to modify Igarashi's Fifth Embodiment to add isolation regions in view of Igarashi's disclosure of isolation regions in its First Embodiment.
  - b. Petitioner's improper new theory that it would have been obvious to modify Igarashi's Fifth Embodiment to add isolation regions in view of Woerlee.
  - c. Petitioner's improper new argument that transistors without isolation region share an active region.
  - d. Petitioner's improper new argument that the entire area between the two STI in Petitioner's modified Igarashi Figure 12 meets the claimed active region.
5. Petitioner's improper new argument that the area between the two STI in Petitioner's modified Igarashi Figure 12 includes multiple active regions.

6. Exclusion of Exhibit 1026, paragraph 18 of Exhibit 1027, and certain portions of the July 25<sup>th</sup> deposition transcript of Petitioner's expert (Ex. 2026) as set forth in Patent Owner's Motion to Exclude Evidence;
7. Any issues specified by Petitioner in its request for Oral Argument;
8. Any motions or issues that remain pending at the time of the hearing;
9. Any other issues the Board deems necessary for issuing a final written decision.

Dated: August 9, 2018

Respectfully submitted,  
*Godo Kaisha IP Bridge 1*

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

I certify that on August 9, 2018 I will cause a copy of the foregoing document, including any exhibits referred to therein, to be served via electronic mail, as previously consented to by Petitioner, upon the following:

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Date: August 9, 2018

/MacAulay Rush/  
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