| Paper N | o |
|---------|---|
|---------|---|

UNITED STATES PATENT AND TRADEMARK OFFICE ————— BEFORE THE PATENT TRIAL AND APPEAL BOARD ————— TAIWAN SEMICONDUCTOR MANUFACTURING CO., LTD, Petitioner, v. GODO KAISHA IP BRIDGE 1, Patent Owner. —————

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

IPR2017-01843¹ Patent 7,893,501

¹ Case IPR2017-01844 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 1232 is the Reply Declaration of Stanley R. Shanfield, Ph.D. Several portions of Exhibit 1232 contain new evidence and/or support for a new theory that is not properly included in a reply. 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.

• ¶¶5-6 and Section I improperly raise a new argument that spacers 23 in Misra are not made of silicon nitride that is only cited in Petitioner's Reply to support new arguments. See Paper No. 22 at pp. 2-6..

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 <u>David.Cavanaugh@wilmerhale.com</u>

Dominic E. Massa <u>Dominic.Massa@wilmerhale.com</u>

Michael H. Smith Michael H. Smith@wilmerhale.com

Date: July 13, 2018 /MacAulay Rush/

MacAulay Rush Patent Paralegal

WOLF GREENFIELD & SACKS, P.C.

