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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 IPR2017-01843¹

PETITIONER'S RESPONSE PURSUANT TO JULY 20, 2018 ORDER

¹ Case IPR2017-01844 has been consolidated with this proceeding.

1. The Reply at 2-3 and 4-6 does not raise a new argument. Rather, it points out the failure of the Patent Owner's response to address Dr. Shanfield's responses to *Patent Owner's* questions about what materials Misra uses for the sidewalls. The Reply points out on page 2 and again on page 4 where the Petition showed the gate protrudes above the silicon nitride ("SiN") film, and where the Petition additionally showed that this is true even if the spacers are made of SiN. The Reply at 4-6 identifies Patent Owner's questioning Dr. Shanfield on this disclosure during cross-examination. The Reply identifies where in the transcript Patent Owner asked Dr. Shanfield about Misra's embodiments where the spacers are made of *other* materials and where Dr. Shanfield confirmed that Misra discloses the sidewalls may be made of other materials like a thermally grown silicon oxide. The Reply explains that Patent Owner ignores this testimony and *only* addresses the embodiments where the sidewalls are SiN. This position is also anchored in the Petition at 40-42 and Dr. Shanfield's testimony regarding the sidewalls. The Reply also confirms in response to PO's arguments and as set forth in the Petition that Misra discloses the protruding gate regardless of whether spacers 23 are constructed out of silicon nitride. Pet. at 42-43; Reply at 3-4, 6-29.

2. The citation to Misra at Ex. 1204, 6:54-58, is also responsive to Patent Owner's questioning of Dr. Shanfield and anchored in the Petition and testimony of record, for the same reasons as described in Item 1., above.

U.S. Patent 7,893,501
IPR2017-01843
Petitioner's Response Pursuant to July 20, 2018 Order

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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