

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re Patent of: Jentsung Lin  
U.S. Patent No.: 7,693,002 Attorney Docket No.: 39521-0054IP1  
Issue Date: April 6, 2010  
Appl. Serial No.: 11/548,132  
Filing Date: October 10, 2006  
Title: DYNAMIC WORD LINE DRIVERS AND DECODERS FOR  
MEMORY ARRAYS

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**PETITION FOR *INTER PARTES* REVIEW OF UNITED STATES PATENT  
NO. 7,693,002 PURSUANT TO 35 U.S.C. §§ 311–319, 37 C.F.R. § 42**

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## EXHIBITS

- APPLE-1001 U.S. Patent No. 7,693,002 to Jentsung Lin (“the ’002 patent”)
- APPLE-1002 Prosecution History of the ’002 patent (“the Prosecution History”)
- APPLE-1003 Declaration of Dr. Robert Horst, Ph.D
- APPLE-1004 Curriculum Vitae of Dr. Horst
- APPLE-1005 U.S. Patent No. 4,951,259 to Yoichi Sato (“Sato”)
- APPLE-1006 U.S. Patent Pub. No. 2006/0098520 to Toru Asano et al. (“Asano”)
- APPLE-1007 Kiyoo Itoh, *VLSI Memory Chip Design*, (Springer 2001) (“Itoh”)
- APPLE-1008 U.S. Patent No. 5,291,076 to Jeffrey T. Bridges (“Bridges”)
- APPLE-1009 Stephen Brown et al., *Fundamentals of Digital Logic with Verilog Design*, (McGraw Hill 2003) (“Brown”)
- APPLE-1010 Declaration of Edward G. Faeth (Authentication of APPLE-1007 and APPLE-1009)
- APPLE-1011 U.S. Patent No. 6,483,771 to Tae-jeen Shin (“Shin”)
- APPLE-1012 U.S. Patent No. 5,602,796 to Kenichiro Sugio (“Sugio”)

Apple Inc., (“Petitioner” or “Apple”) petitions for Inter Partes Review (“IPR”) under 35 U.S.C. §§ 311–319 and 37 C.F.R. § 42 of claims 1-28 and 31-37 (“the Challenged Claims”) of U.S. Patent No. 7,693,002 (“the ’002 patent”). As explained in this petition, there exists a reasonable likelihood that Apple will prevail with respect to at least one of the Challenged Claims.

The Challenged Claims are unpatentable based on teachings set forth in at least the references presented in this petition. Apple respectfully submits that an IPR should be instituted, and that the Challenged Claims should be canceled as unpatentable.

**I. REQUIREMENTS FOR IPR UNDER 37 C.F.R. § 42.104**

**A. Grounds for Standing Under 37 C.F.R. § 42.104(a)**

Apple certifies that the ’002 Patent is available for IPR. The present petition is being filed within one year of service of a complaint against Apple in ITC investigation Mobile Electronic Devices and Radio Frequency and Processing Components (ITC-337-TA-1093); and Qualcomm Inc. v. Apple Inc., 3:17-CV-02398 (S.D. Cal.).

Apple is not barred or estopped from requesting this review challenging the Challenged Claims on the below-identified grounds.

**B. Challenge Under 37 C.F.R. § 42.104(b) and Relief Requested**

Petitioner requests IPR on the grounds in the table below, as explained herein

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