United States Patent and Trademark Office Before the Patent Trial and Appeal Board

> Intel Corporation Petitioner, v. Qualcomm Incorporated Patent Owner

Case Nos: IPR2019-00047, IPR2019-00048, and IPR2019-00049 Petitioner's Demonstrative Exhibits

Inter Partes Review of U.S. Patent No. 9,154,356

April 7, 2020

Intel 1141 Intel v. Qualcomm IPR2019-00048

#### Agenda

- Introduction
- Technology Background
- U.S. Patent No. 9, 154,356
- Claim Construction
- Overview of Prior Art for IPR2019-00047
- Disputed Issues for IPR2019-00047
- Overview of Prior Art for IPR2019-00048 and IPR2019-00049
- Disputed Issues for IPR2019-00048 and IPR2019-00049

## Introduction

### Introduction: Previous '356 Patent IPRs

IPR2019-00128						
Grounds	Reference(s)	Challenged Claims				
Ground I	Anticipated by Lee I, 7, 8, 11, 17, and 18					
Ground II	Obvious over Lee 7 and 8					
Ground III	<b>Obvious over Lee in view of Feasibility Study</b>	I, 7, 8, II, I7, and I8				
IPR2019-00129						
Grounds	Reference(s) Challenged Cl					
Ground I	Anticipated by Lee	2-6				
Ground II	Obvious over Lee in view of Youssef	10				
Ground III	Obvious over Lee in view of Feasibility Study 2-6					
Ground IV	Obvious over Lee in view of Feasibility Study and Youssef					

-00128 IPR, Paper 9 (Institution Decision) at 32; -00129 IPR, Paper 9 (Institution Decision) at 35-36

### **Introduction:** Instituted Grounds

IPR2019-00047					
Grounds	Reference(s)	Challenged Claims			
Ground I	Claims 1, 11, 17, 18	Anticipated by Uehara			
Ground II	Claims 7 and 8	Obvious over Uehara in view of Perumana			
Ground III	Claim 10	Obvious over Uehara in view of Youssef			
Ground IV	Claims 1, 11, 17, 18	Obvious over Uehara in view of Feasibility Study			
GroundV	Claims 7 and 8	Obvious over Uehara in view of Feasibility Study and Perumana			
Ground VI	Claim 10	Obvious over Uehara in view of Feasibility Study and Youssef			

### **Introduction:** Instituted Grounds

IPR2019-00048				
Grounds	Reference(s)	Challenged Claims		
Ground I	Claims 1, 17, 18	Obvious over Jeon in view of Xiong		
Ground II	Claims 9 and 10	Obvious over Jeon in view of Xiong and Youssef		
Ground III	Claims 1, 17, 18	Obvious over Jeon in view of Xiong and Feasibility Study		
Ground IV	Claims 9 and 10	Obvious over Jeon in view of Xiong, Feasibility Study, and Youssef		

IPR2019-00049				
Grounds	ounds Reference(s) Challenged Claims			
Ground I	Claims 2-8, I I	Obvious over Jeon in view of Xiong		
Ground II	Claims 2-8, I I	Obvious over Jeon in view of Xiong and Feasibility Study		

-00048 IPR, Paper 8 (Institution Decision) at 20; -00049 IPR, Paper 8 (Institution Decision) at 19

### **Introduction:** Prior Adjudication

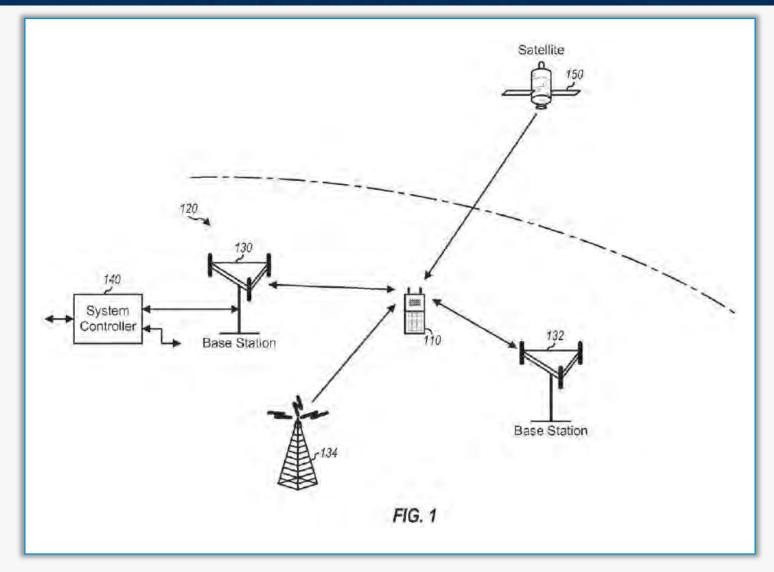
#### **ITC Markman Order**

In spite of this explanation with examples, Qualcomm and Staff make an unusual argument that the construction of "carrier aggregation" should incorporate language not used to describe "carrier aggregation" in the '356 patent specification. (SMBr. at 12 A bandwidth limitation like the one proposed by Staff and Qualcomm would steer "carrier aggregation" away from how the applicant characterized the invention and toward prior art the applicant distinguished from the invention. Moreover, as mentioned

-00047 IPR, Ex. 1036 (Markman CC Order) Appx.A at 24, 27 (annotated)

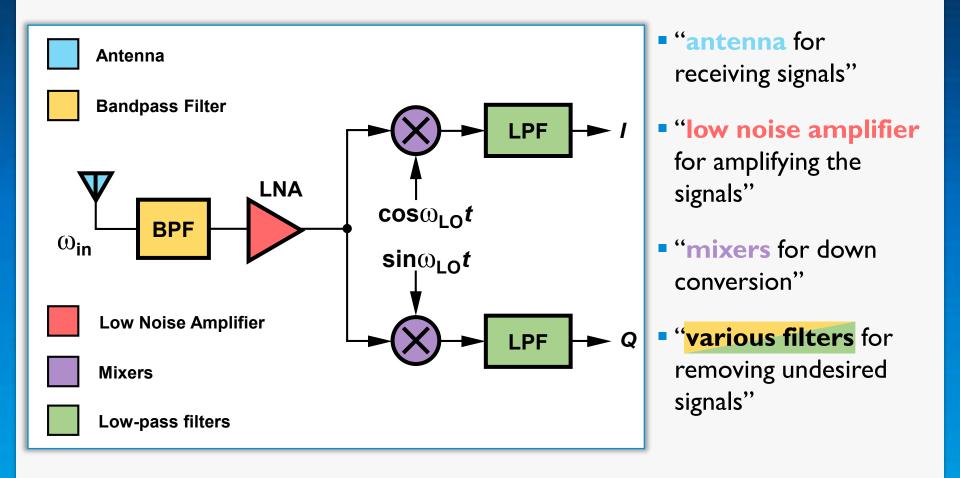
## **Technology Background**

#### **Technology Background: Wireless System**

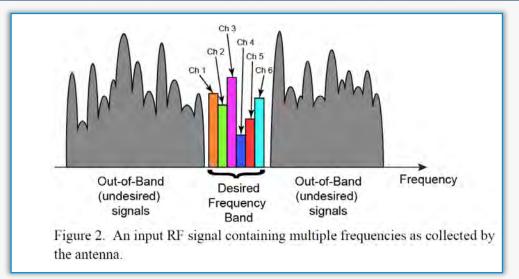


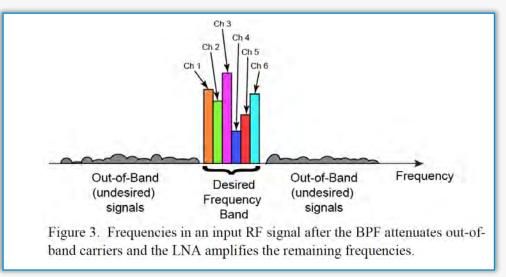
-00047 IPR, Ex. 1001 ('356 Patent) Fig. I

#### **Technology Background: Basic Receiver**



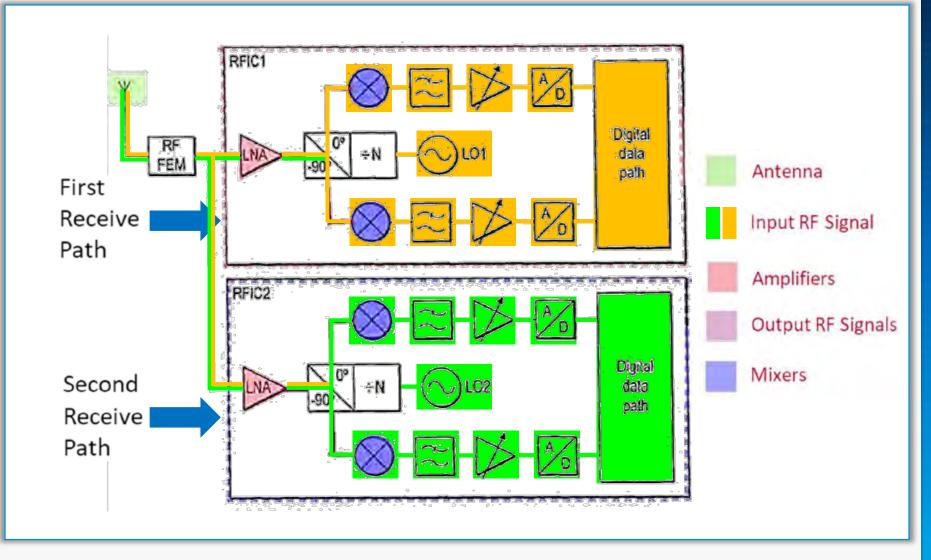
### **Technology Background: Carrier Aggregation**





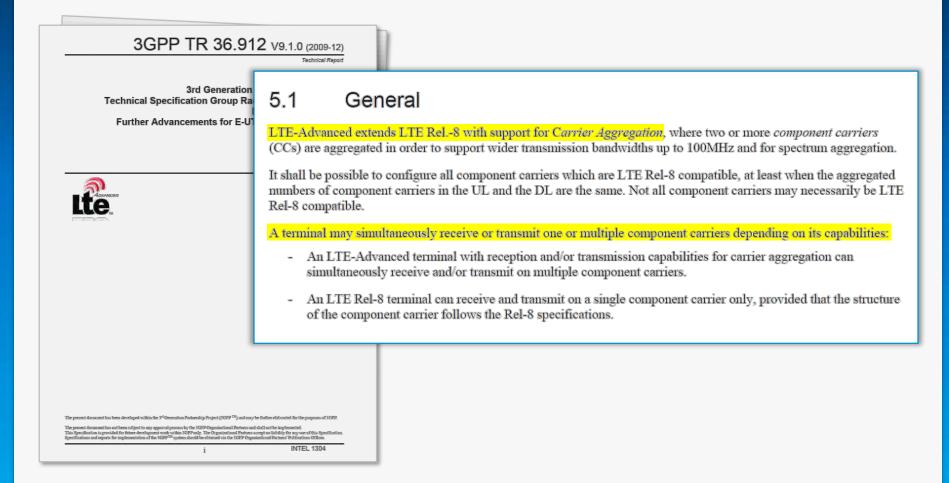
-00047 IPR, Paper 3 (Petition) at 9-10, Figs. 2, 3

## **Technology Background: Carrier Aggregation**



-00047 IPR, Paper 3 (Petition) at 15, Fig. 7 (annotated); see also -00047 IPR, Ex. 1025 (Kaukovuori), Fig. 15

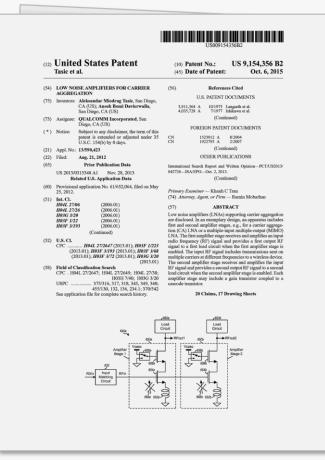
### **Technology Background: Carrier Aggregation**



-00047 IPR, Ex. 1004 (Feasibility Study) at 8, 9 (annotated)

## U.S. Patent No. 9,154,356

#### U.S. Patent No. 9,154,356



# (10) Patent No.:(45) Date of Patent:

(57)

#### US 9,154,356 B2 Oct. 6, 2015

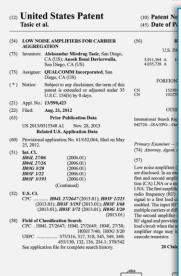
#### (54) LOW NOISE AMPLIFIERS FOR CARRIER AGGREGATION

ABSTRACT

Low noise amplifiers (LNAs) supporting carrier aggregation are disclosed. In an exemplary design, an apparatus includes first and second amplifier stages, e.g., for a carrier aggregation (CA) LNA or a multiple-input multiple-output (MIMO) LNA. The first amplifier stage receives and amplifies an input radio frequency (RF) signal and provides a first output RF signal to a first load circuit when the first amplifier stage is enabled. The input RF signal includes transmissions sent on multiple carriers at different frequencies to a wireless device. The second amplifier stage receives and amplifies the input RF signal and provides a second output RF signal to a second load circuit when the second amplifier stage is enabled. Each amplifier stage may include a gain transistor coupled to a cascode transistor.

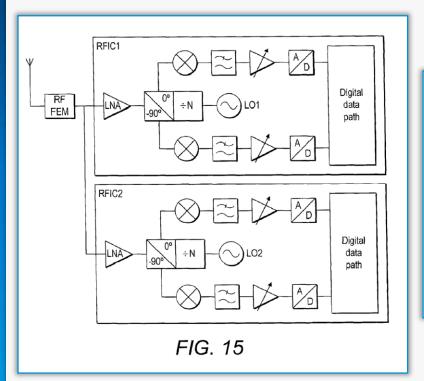
#### **'356 Patent: Alleged Problem in the Prior Art**





A wireless device may support carrier aggregation, which is simultaneous operation on multiple carriers. A carrier may refer to a range of frequencies used for communication and may be associated with certain characteristics. For example, a carrier may be associated with system information describing operation on the carrier. A carrier may also be referred to as a component carrier (CC), a frequency channel, a cell, etc. It is desirable to efficiently support carrier aggregation by the wireless device.

#### **'356 Patent: File History**



-00047 IPR, Ex. 1025 (Kaukovouri ) at Fig. 15

3. Claims 1, 11-12, 14 and 17 are rejected under pre-AIA 35 U.S.C. 102(e) as being anticipated by Kaukovuori et al. U.S. Patent 8,442,473.
Regarding claim 1, Kaukovuori et al. discloses an apparatus (FIG. 15 embodiment) comprising:
a first amplifier stage configured to receive and amplify an input radio frequency (RF) signal and provide a first output RF signal to a first load circuit when the first

amplifier stage is enabled, the input RF signal employing carrier aggregation comprising

transmissions sent on multiple carriers at different frequencies to a wireless device, the

-00047 IPR, Ex. 1016 at 2 (annotated)

#### **'356 Patent: File History**

#### IN THE UNITED STATES PATENT AND TRADE

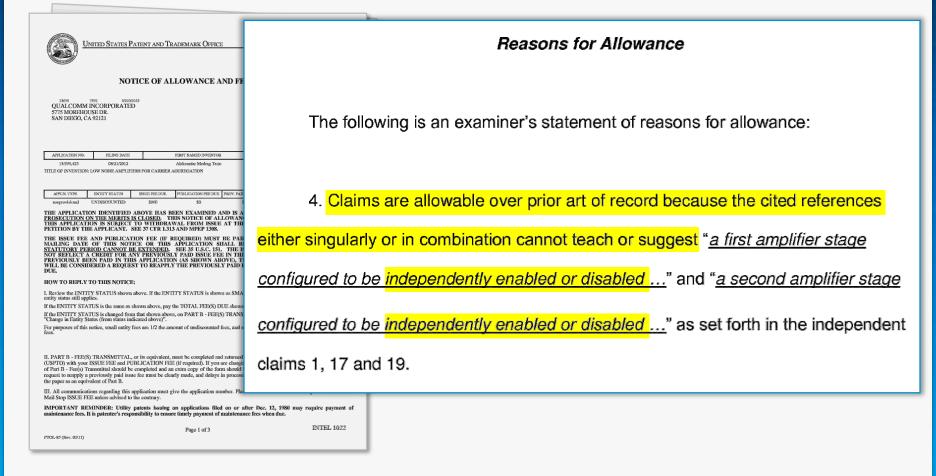
Application No.	ž	13/590,423	Confirmation [				
Applicant :		Aleksandar Mo	Aleksandar Modrag Tasic				
Filed	;	August 21, 2012.					
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Docket No.	:	121973					
Customer No.	:	23696					
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Sir:							
In response	In response to an Office Action dated December 26, 20						
identified applicati	identified application as follows:						
Amendmen	Amendments to the Claims are reflected in the listing of c						
of this paper.							
Remarks/Arguments begin on page 7 of this paper.							
Attorney Docket No. 1 Castomer No. 23696	Attorney Docket No. 121973 Customer No. 23696						

#### 1. (Currently amended) An apparatus comprising:

a first amplifier stage configured to <u>be</u> independently enabled or disabled, the first amplifier <u>stage further configured to</u> receive and amplify an input radio frequency (RF) signal and provide a first output RF signal to a first load circuit when the first amplifier stage is enabled, the input RF signal employing carrier aggregation comprising transmissions sent on multiple carriers at different frequencies to a wireless device, the first output RF signal including at least a first carrier of the multiple carriers; and a second amplifier stage further configured to <u>be</u> independently enabled or disabled, the second amplifier stage further configured to receive and amplify the input RF signal and provide a second output RF signal to a second load circuit when the second amplifier stage is enabled, the second output RF signal to a second load circuit when the second amplifier stage is enabled, the second output RF signal including at least a second load circuit when the second amplifier stage is enabled, the second output RF signal including at least a second load circuit when the second amplifier stage is enabled, the second output RF signal including at least a second carrier of the multiple carriers different than the first carrier.

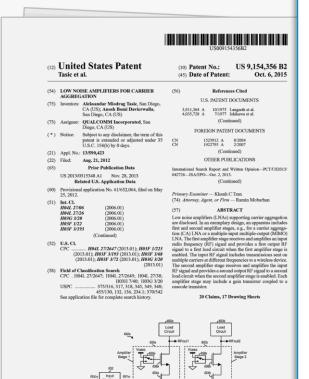
INTEL 1020

#### **'356 Patent: File History**



#### -00047 IPR, Ex. 1022 at 4-5 (annotated)

#### '356 Patent: Overview of Claim I



- 1. An apparatus comprising:
- a first amplifier stage configured to be independently enabled or disabled, the first amplifier stage further configured to receive and amplify an input radio frequency (RF) signal and provide a first output RF signal to a first load circuit when the first amplifier stage is enabled, the input RF signal employing carrier aggregation comprising transmissions sent on multiple carriers at different frequencies to a wireless device, the first output RF signal including at least a first carrier of the multiple carriers; and
- a second amplifier stage configured to be independently enabled or disabled, the second amplifier stage further configured to receive and amplify the input RF signal and provide a second output RF signal to a second load circuit when the second amplifier stage is enabled, the second output RF signal including at least a second carrier of the multiple carriers different than the first carrier.

#### **'356 Patent: Overview of Claim 17**

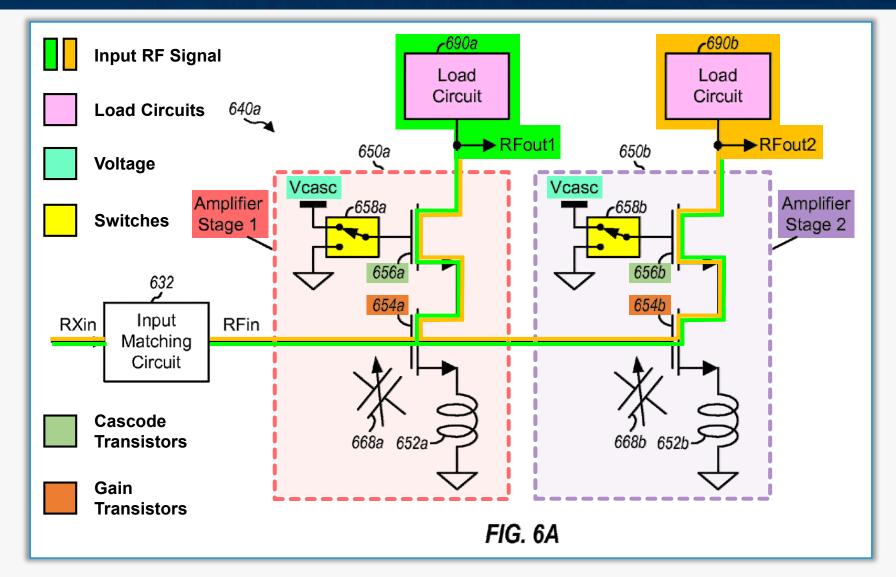
#### **17**. A method comprising:

amplifying a first input radio frequency (RF) signal with a first amplifier stage to obtain a first output RF signal when the first amplifier stage is enabled, the first amplifier stage configured to be independently enabled or disabled, the first input RF signal employing carrier aggregation comprising transmissions sent on multiple carriers at different frequencies to a wireless device, the first output RF signal including at least a first carrier of the multiple carriers; and

amplifying the first input RF signal or a second input RF signal with a second amplifier stage to obtain a second output RF signal when the second amplifier stage is enabled, the second amplifier stage configured to be independently enabled or disabled, the second output RF signal including at least a second carrier of the multiple carriers different than the first carrier.

(12)	United States Patent Tasic et al.			(10) Patent No (45) Date of P		US 9,1	
(54)	LOW NO		FIERS FOR CARRIER	(56)			aces Cited
(75)	Inventors:		Miodrag Tasic, San Diego nosh Bomi Davierwalla, CA (US)	3,	U.S 911,364 A 035,728 A	10/1975	DOCUMENT Langseth et al. Ishikawa et al.
(73)	Assignee:		IM Incorporated, San		FORE		tinued) NT DOCUME
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(21)	Appl. No.:	13/590,423	.,.,.			(Con	tinued)
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(60)	Re		Nov. 28, 2013 plication Data No. 61/652.064, filed on Ma	042726	-ISA/EPO-	-Oct. 2, 201	f Written Opinio 13. tinued)
ц у	(20) (20) Field of C	26 () 0 () 2 () 93 () (Contin H04L 27/ 13.01); H03F D13.01); H03I 1assification 5	2647 (2013.01); H03F 1/2; 3/193 (2013.01); H03F 3/4 F 3/72 (2013.01); H03G 3/2 (2013.01); H03G 3/2	(74) A (57) Low n are dis first an tion (C LNA.7 radio f signal de enable multip (1) The se R F sig 8; load ci	oise amplifi closed. In a d second a A) LNA or The first amp requency (1 to a first los d. The inpu le carriers a cond ampli and and prov reuit when t	ent, or First ABS7 ers (LNAs) a exemplar mplifier stage a multiple plifier stage RF) signal ad circuit w RF signal t different f fior stage r rides a second he second	C Tran m — Ramin Mo <b>IRACT</b> ) supporting car y design, an ap ges, e.g., for a -input multiple- receives and an and provides a when the first a includes transit frequencies to a coerives and am ond output RF si amplifier stage
		455/1	316, 317, 318, 345, 349, 34 30, 132, 136, 234.1; 370/54 complete search history.	0; cascod	e transistor.		Drawing Shee

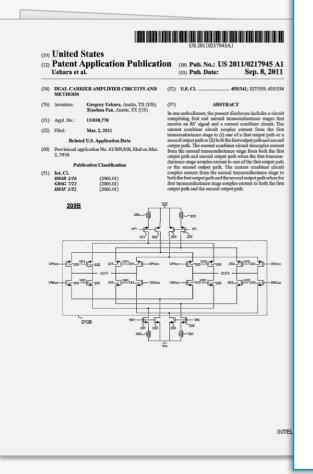
#### **Overview of '356 Patent**



-00047 IPR, Paper 3 (Petition) at 23; -00047 IPR, Ex. 1001 ('356 Patent), Fig. 6A (annotated)

"carrier aggregation"				
Petitioner	Patent Owner			
"simultaneous operation on multiple carriers"	"[1] simultaneous operation on multiple carriers [2] that are combined as a single virtual channel [3] to provide higher bandwidth"			

-00047 IPR, Paper 3 (Petition) at 30-34; -00047 IPR, Paper 12 (POR) at 11-31



- 1. An apparatus comprising:
- a first amplifier stage configured to be independently enabled or disabled, the first amplifier stage further configured to receive and amplify an input radio frequency (RF) signal and provide a first output RF signal to a first load circuit when the first amplifier stage is enabled, the input RF signal employing carrier aggregation comprising transmissions sent on multiple carriers at different frequencies to a wireless device, the first output RF signal including at least a first carrier of the multiple carriers; and
- a second amplifier stage configured to be independently enabled or disabled, the second amplifier stage further configured to receive and amplify the input RF signal and provide a second output RF signal to a second load circuit when the second amplifier stage is enabled, the second output RF signal including at least a second carrier of the multiple carriers different than the first carrier.

DOCKET NO.: 0107131-00573US1 Filed on behalf of Intel Corporation By: David L. Cavanaugh, Reg. No. 36,476 John V. Hobgood, Reg. No. 61,540 Benjamin S. Fernandez, Reg. No. 55,172 Wilmer Cutter Pickering Hale and Dorr LLP 1875 Pennsylvania Ave., NW Washington, DC 20006 Tel: (202) 663-6000 Email: David.Cavanaugh@wilmerhale.com John.Hobgood@wilmerhale.com Ben.Fernandez@wilmerhale.com

UNITED STATES PATENT AND TRADEM

#### BEFORE THE PATENT TRIAL AND APPI

INTEL CORPORATION Petitioner v. QUALCOMM INCORPORATEL Patent Owner Case IPR2019-00047 DECLARATION OF PATRICK FAY U.S. PATENT NO. 9,154,356 CLAINS 1, 7, 8, 10, 11, 17, and 1 62. This construction is consistent with the understanding of persons having ordinary skill in the art. As described above, carrier aggregation is

commonly understood to mean sending data to or from a radio on multiple carriers

at the same time. Carrier aggregation is known to have multiple uses and is not

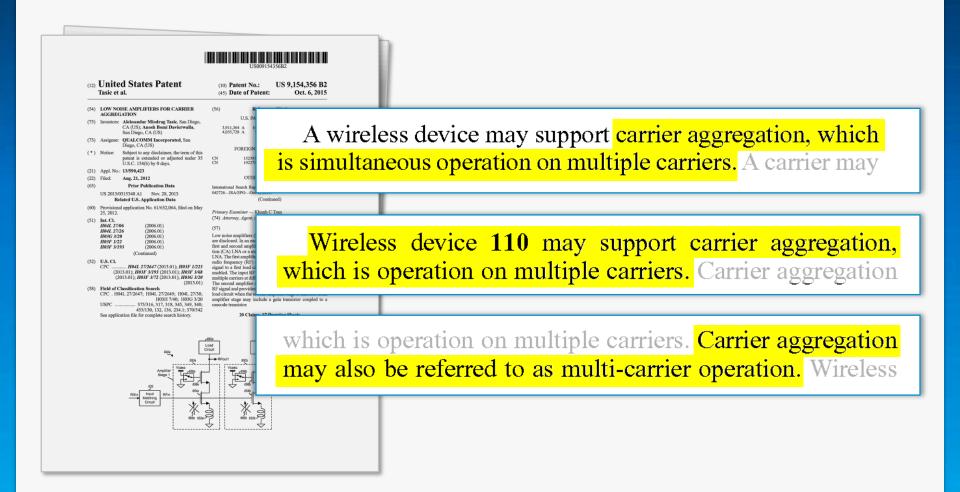
limited to any particular use. In light of this multi-purpose operation, it is my

conclusion that "simultaneous operation on multiple carriers" captures the

meaning of "carrier aggregation" to a person having ordinary skill in the art.

-00047 IPR, Ex. 1002 (Fay Decl.) at ¶ 62 (annotated)

INTEL 1002



-00047 IPR, Ex. 1001 ('356 Patent) at 1:32-33, 2:53-55 (annotated)

- Phillips v. AWH Corp.,
   415 F.3d 1303, 1315 (Fed. Cir. 2005) (en banc)
  - "[T]he specification is always highly relevant to the claim construction analysis. Usually, it is dispositive; it is the single best guide to the meaning of a disputed term." (internal quotation marks omitted)

#### ITC Construction of "Carrier Aggregation" Under Phillips

In sum, free from artificial limitations, the proper construction of "carrier aggregation" comes straight from the specification of the '356 patent: "simultaneous operation on multiple carriers."

-00047 IPR, Ex. 1036 (Markman CC Order) Appx.A at 30 (annotated)

Rembrandt Wireless Techs., L.P. v. Samsung Elecs. Co., 853 F.3d 1370, 1377 (Fed. Cir. 2017)

 "the Board in IPR proceedings operates under a broader claim construction standard than the federal courts"

-00047 IPR, Paper 19 (Petitioner's Reply to POR) at 2

#### Qualcomm

Qualcomm's proposed construction is "simultaneous operation on multiple carriers that are combined as a single virtual channel to provide higher bandwidth"

#### "simultaneous operation on multiple carriers"

A wireless device may support carrier aggregation, which is simultaneous operation on multiple carriers. A carrier may

-00047 IPR, Ex. 1001 ('356 Patent) at 1:32-33 (annotated)

#### "that are combined as a single virtual channel to provide higher bandwidth"

 "single virtual channel" and "higher bandwidth" do not appear in the '356 specification

-00047 IPR, Paper 19 (Petitioner's Reply to POR) at 4

#### Qualcomm

Qualcomm argues that the '356 specification's statements regarding "carrier aggregation" do not meet the standard for lexicography

#### Phillips v. AWH Corp.

"[T]he specification is always highly relevant to the claim construction analysis. Usually, it is dispositive; it is the single best guide to the meaning of a disputed term." (internal quotation marks omitted)

#### Qualcomm

Qualcomm relies primarily on disclosure in the '356 patent that focuses on LTE

#### '356 Patent

tems (GNSS), etc. Wireless device **110** may support one or more radio technologies for wireless communication such as LTE, cdma2000, WCDMA, GSM, 802.11, etc.

-00047 IPR, Ex. 1001 ('356 Patent) at 2:50-52 (annotated)

#### Qualcomm

Qualcomm argues that its distinguishing of the '356 claims over Hirose supports its construction

#### '356 File History

**Regarding amended independent claims 1 and 17**, Applicant's amended independent claims 1 and 17 recite, *inter alia*, "the [] input RF signal employing *carrier aggregation*," which is <u>not</u> disclosed in Hirose. Generally, Applicant's claimed invention recites "carrier aggregation" which results in an *increased aggregated* data rate. In contrast, Hirose transmits the same signals over different paths which results in *redundant* data at a *common* data rate. Specifically, the

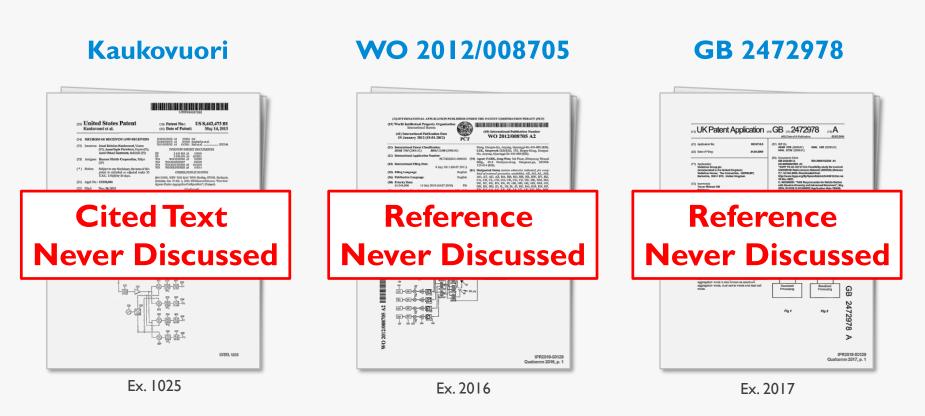
-00047 IPR, Ex. 1015 (Patent Owner's June 6, 2014 Response) at 7 (annotated)

Applicant respectfully asserts that Hirose's "satellite wave signal and ground wave signal" do not result in "carrier aggregation" as claimed by Applicant in amended independent claims 1 and 17. As stated, Applicant's amended independent claims 1 and 17 recite, *inter alia*, "the [] input RF signal employing *carrier aggregation*," while Hirose discloses *redundant* data at a *common* data rate. Specifically, Hirose discloses:

-00047 IPR, Ex. 1015 (Patent Owner's June 6, 2014 Response) at 7-8 (annotated)

#### Qualcomm

Qualcomm relies on three specific pieces of prior art cited in the '356 prosecution history



-00047 IPR, Paper 12 (Patent Owner Response) at 16-18

#### Qualcomm

Qualcomm argues that Intel's construction renders claim language redundant

#### '356 Patent

- 1. An apparatus comprising:
- a first amplifier stage configured to be independently enabled or disabled, the first amplifier stage further configured to receive and amplify an input radio frequency (RF) signal and provide a first output RF signal to a first load circuit when the first amplifier stage is enabled, the input RF signal employing carrier aggregation [simultaneous operation on multiple carriers] comprising transmissions sent on multiple carriers at different frequencies to a wireless device, the first output RF signal including at least a first carrier of the multiple carriers;

#### Intel's construction includes the concept of "simultaneous operation"

-00047 IPR, Ex. 1001 ('356 Patent) at Claim I (annotated); -00047 IPR, Paper 12 (Patent Owner Response) at 30-31

#### Qualcomm

Qualcomm argues that Intel's construction reads out "aggregation"

#### **Fay Declaration**

27. Patent Owner argues that the Petition's BRI construction reads out the word "aggregation." POR, 30-31. I disagree. When the claimed "input RF signal" employs "simultaneous operation on multiple carriers," those carriers will be aggregated along the input RF signal. Pet., 51-53 ("input RF signal includes 'two channels encoded around two different carrier frequencies (i.e., *dual carriers*)."). Thus, "carrier aggregation" in the context of the challenged claims accounts for aggregation (*i.e.*, collected together, assembled, as defined in the POR, 30), because the multiple carriers would be present simultaneously in the input RF signal.

28. Because the '356 patent describes "carrier aggregation" as encompassing wireless devices that support "one or more radio technologies for wireless communication such as LTE, cdma2000, WCDMA, GSM, 802.11, etc.," when two or more carriers in a carrier aggregated signal are received according to "one or more" of these technologies, those carriers are all aggregated in the input RF signal (e.g. "RFin" in FIG. 6A) that enters the amplifier.

-00047 IPR, Ex. 1039 (Second Fay Decl.) at ¶¶ 27, 28 (annotated)

# **Claim Construction: "Carrier Aggregation"**

#### Qualcomm

Qualcomm argues that its construction is supported by extrinsic evidence

### Phillips v. AWH Corp.

However, while extrinsic evidence "can shed useful light on the relevant art," we have explained that it is "less significant than the intrinsic record in determining 'the legally operative meaning of claim language."

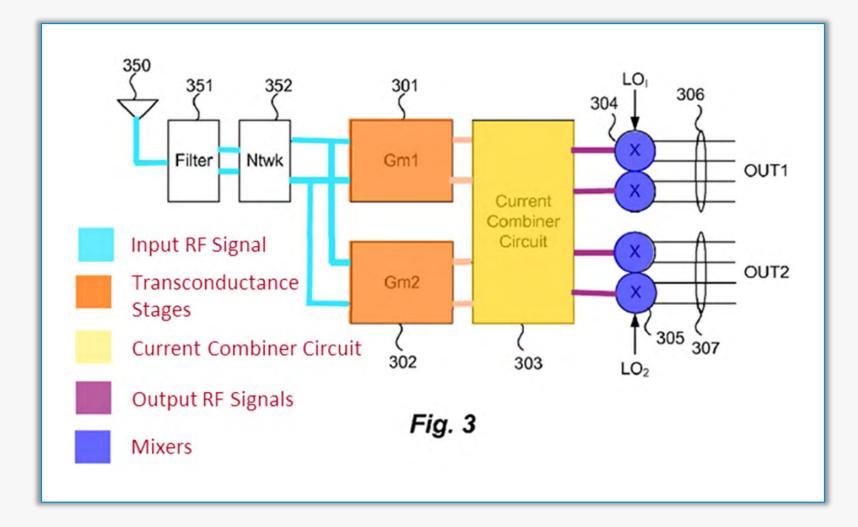
In sum, extrinsic evidence may be useful to the court, but it is unlikely to result in a reliable interpretation of patent claim scope unless considered in the context of the intrinsic evidence.

Phillips v.AWH Corp., 415 F.3d 1017, 1019 (Fed. Cir. 2005) (en banc)

# IPR2019-00047

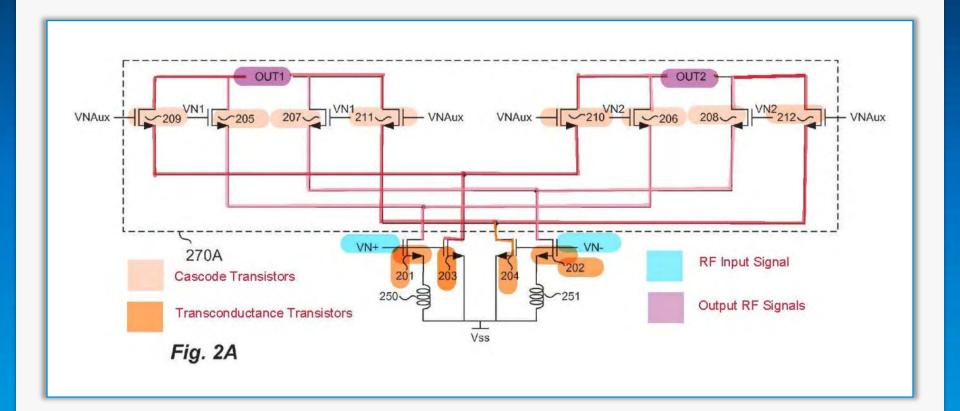
# **Overview of Prior Art for IPR2019-00047**

#### Uehara



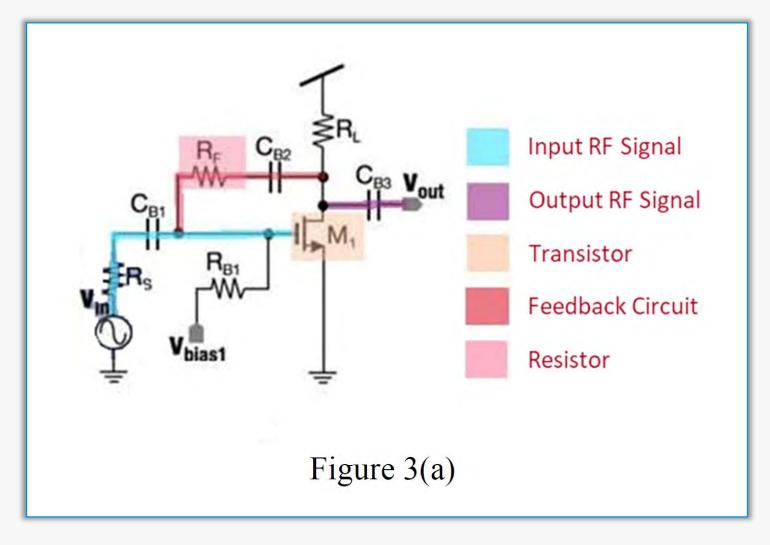
-00047 IPR, Paper 3 (Petition) at 36, Fig. 3

#### Uehara



-00047 IPR, Paper 3 (Petition) at 37, Fig. 2A

#### Perumana



-00047 IPR, Paper 3 (Petition) at 41, Fig. 3(a)

#### Youssef

#### Digitally-Controlled RF Passive At CMOS for Mobile TV Tu

Ahmed Youssef and James Haslett Electrical and Computer Engineering Department University of Calgary Alberta, Canada

Abstract-A novel VHF/UHF passive attenuator linearization circuit suitable for mabile TV applications has been designed and implemented in 65 nm CMOS technology. The proposed attenuator has a wide gain range of 48 dB that can be digitally programmed in 3 to 6 dB steps. At every gain setting, the input and output of the attenuator are matched to 50  $\Omega$  to facilitate its integration into mobile TV tuners.

#### I. INTRODUCTION

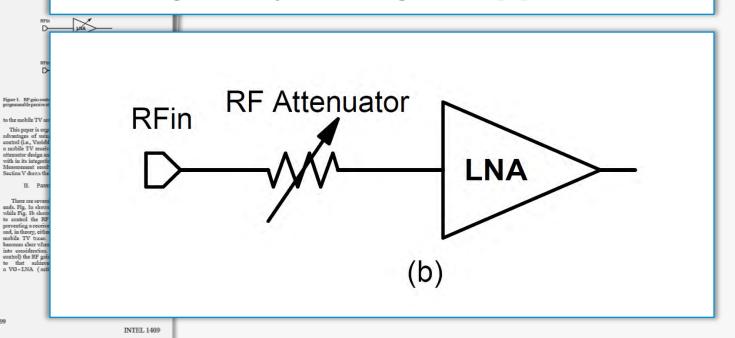
Mobile TV is one of the latest features to be added to cell phones and other hand-held devices. The low cost, low power, and small size demands of this application have pushed researchers to use nanometer CMOS technologies in des signing Figure 1. RF gain high performance tuner chip sets. The bulky RF filters (i.e., programmable passi SAW filters) usually used in traditional TV-can tuers to suppress far-away interferer blockers are thus not an option for these integrated tuners. This results in tightening the linearity requirement of the RF front-end needed for mobile TV recention, and hence demands innovative design techniques to adhere to the low power necessities for this application [1].

The RF-AGC (Automatic gain control) technique has been proposed recently in the literature as one of the low yourer solutions that can help mobile TV receivers achieve their stringent linearly requirements [2]-[4]. Decreming the RF gain at large input signal levels helps the receiver pass larger signals without any degradation in the output SNR (Signal-to-Noise Ratio). Although there are many mechanisms to vary the RF gain in receivers, the efficacy of any given mechanism depends on the amount of the dynamic range that can be achieved while decreasing the RF gain.

This paper proposes an RF attenuator linearization circuit used to vary the RF gain of mobile TV receivers while maximizing their dynamic range. The paper describes a passive attenuator designed, implemented in 65 nm CMOS technology and characterized in the lab. Additionally, a 5 bit linear thermometer decoder [5] integrated in the same test chip Inter intermonieter decoder [3] mitigated in the same test chap is used to program the gain of the attenuator. The decoder sets the gain value according to the signal level received at the attenuator input. Also, an on-solip programmable matching a VG-LNA (actin attenuator is used to provide a stable 50 dimpt resistance

978-1-4244-5309-2/10/\$26:00 @2010 IEEE

This paper proposes an RF attenuator linearization circuit used to vary the RF gain of mobile TV receivers while maximizing their dynamic range. The paper describes a



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# Feasibility Study

#### 3GPP TR 36.912 V9.1.0 (2009-12)

Technical Report

3rd Generation Partnership Project; Technical Specification Group Radio Access Network; Feasibility study for Further Advancements for E-UTRA (LTE-Advanced) (Release 9)

LTE-Advanced extends LTE Rel.-8 with support for Carrier Aggregation, where two or more component carriers (CCs) are aggregated in order to support wider transmission bandwidths up to 100MHz and for spectrum aggregation.

The present document has been developed within th	ue 3 <sup>rd</sup> Generation Partnership Project (3GPP <sup>138</sup> ) ar	id may be fluther elaborated for the purposes of 3GPP.
The present document has not been subject to any a This Specification is provided for fishine developme Specifications and reports for implementation of the	pproval process by the 3GPP Organizational Parts at work within 3GPP only. The Organizational Pa a 3GPP <sup>TM</sup> system should be obtained via the 3GP	zers and shall not be implemented. afners accept no liability for any use of this Specification. P Organizational Partners' Publications Offices.
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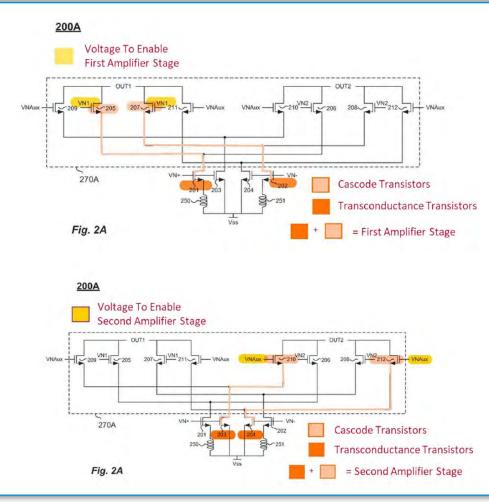
-00047 IPR, Ex. 1004 (Feasibility Study) at 8 (annotated)

# **Disputed Issues for IPR2019-00047**

# **Disputed Issues for IPR2019-00047**

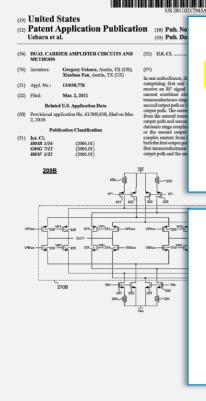
- Anticipation by Uehara
  - Claims 1, 11, 17, 18
- Motivation to Combine Uehara and Perumana
  - Claims 7 and 8
- Motivation to Combine Uehara and Youssef
  - Claim 10
- Motivation to Combine Uehara and Feasibility Study
  - Claims 1, 7, 8, 10, 11, 17, 18

#### **Configured to be independently enabled or disabled**



-00047 IPR, Paper 19 (Petitioner's Reply to POR) at 9, Fig 2A

#### **Configured to be independently enabled or disabled**



OUT2. Cascode transistors 205 and 207 may be selectively turned on or off by controlling voltage VN1 at the gate of transistor 205 and the gate of transistor 207, thereby coupling or decoupling current from transistors 201 and 202 from output path OUT1. Likewise, cascode transistors 206 and 208

OUT2. Accordingly, in this example, cascode transistors 209-212 may be selectively turned on or off together by controlling voltage VNAux at the gate of each transistor 209-212, thereby coupling or decoupling current from transistors 203 and 204 to or from output path OUT1 and output path OUT2.

-00047 IPR, Ex. 1003 (Uehara) at ¶¶ 36, 38 (annotated)

INTEL 1003

#### **Configured to be independently enabled or disabled**

DOCKET NO .: 0107131-00573US1 Filed on behalf of Intel Corporation By: David L. Cavanaugh, Reg. No. 36,476 John V. Hobgood, Reg. No. 61,540 Benjamin S. Fernandez, Reg. No. 55,172 Gregory H. Lantier, pro hac vice Wilmer Cutler Pickering Hale and Dorr LLP 1875 Pennsylvania Ave., NW Washington, DC 20006 Tel: (202) 663-6000 Email: David Cavanaugh@wilmerhale.com John Hobgood@wilmerhale.com Ben Fernandez@wilmerhale.com Gregory.Lantier@wilmerhale.com UNITED STATES PATENT AND TRADE BEFORE THE PATENT TRIAL AND AI INTEL CORPORATION Petitioner w. OUALCOMM INCORPORAT Patent Owner Case IPR2019-00047 U.S. Patent No. 9,154,356 DECLARATION OF PATRICK FAY, PH. D PETITIONER'S REPLY

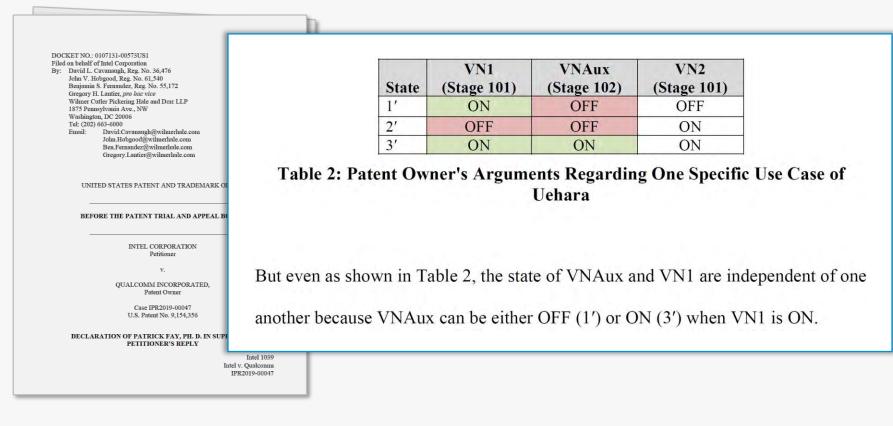
*configured* to be independently enabled or disabled. Each amplifier stage in Uehara, as identified by the Petition, has a distinct control voltage (VN1, VNAux), and a cascode transistor that can be "selectively enabled." Ex. 1003, ¶36. A POSITA would understand that, based on the two distinct control voltages (VN1, VNAux) that each can take on two values, Uehara teaches at least four

operational/control states, which I have summarized in Table 1 below:

	VN1 (stage	VNAux
State	101)	(stage 102)
1	ON	OFF
2	OFF	ON
3	ON	ON
4	OFF	OFF

#### Configured to be independently enabled or disabled

#### VNI and VNAux are independent of VN2



-00047 IPR, Ex. 1039 (Second Fay Decl.) at ¶ 33

#### **Configured to be independently enabled or disabled**

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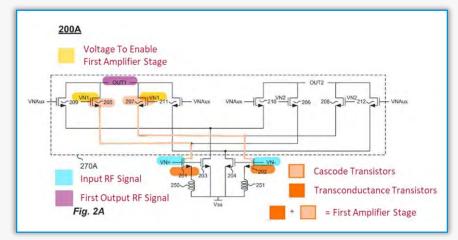
consistent with Table 1, above. *Id.* In Table 3 below, I add the dual-carrier operational states described in paragraph [0032] of Uehara (these dual carrier states from [0032] are denoted 3" and 4"). Comparing states 1' and 3", it is clear that VNAux can be either ON or OFF if VN1 is ON and VN2 is OFF. Likewise, comparing states 2' and 4", VNAux can be either ON or OFF if VN1 is OFF and VN2 is ON. Thus, VNAux is not dependent on state of the VN1 (or VN2) signals in the embodiment described in paragraph [0032]. Furthermore, since VN1

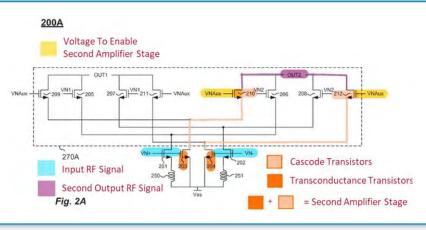
State	VN1 (Stage 101, OUT1)	VNAux (Stage 102, OUT1 and OUT2)	VN2 (Stage 101, OUT2)		
1'	ON	OFF	OFF		
2'	OFF	OFF	ON		
3"	ON	ON	OFF		
4″	OFF	ON	ON		

Table 3: Operational Use Case Described in ¶[0031] (single carrier modes)and ¶[0032] (dual carrier modes) of Uehara.

-00047 IPR, Ex. 1039 (Second Fay Decl.) at ¶ 33

# Providing a first/second output RF signal to a first/second load circuit





-00047 IPR, Paper 3 (Petition) at 49, 58

# Providing a first/second output RF signal to a first/second load circuit

- 1. An apparatus comprising:
- a first amplifier stage configured to be independently enabled or disabled, the first amplifier stage further configured to receive and amplify an input radio frequency (RF) signal and provide a first output RF signal to a first load circuit when the first amplifier stage is enabled, the input RF signal employing carrier aggregation comprising transmissions sent on multiple carriers at different frequencies to a wireless device, the first output RF signal including at least a first carrier of the multiple carriers; and
- a second amplifier stage configured to be independently enabled or disabled, the second amplifier stage further configured to receive and amplify the input RF signal and provide a second output RF signal to a second load circuit when the second amplifier stage is enabled, the second output RF signal including at least a second carrier of the multiple carriers different than the first carrier.

-00047 IPR, Ex. 1001 ('356 Patent) at Claim 1 (annotated)

#### **Qualcomm's Expert**

Q Focus just on the claim language. You would agree that the claim does not require the first amplifier stage to provide a first output RF signal only to a first load circuit when the first amplifier stage is enabled; correct?

A The word "only" does not appear in the

claim. That's facial. I'll agree with that.

-00047 IPR, Ex. 1040 (Foty Tr.) at 48:10-16 (annotated)

# Providing a first/second output RF signal to a first/second load circuit

Each of the amplifier stages in Uehara is already "configured" to provide an output RF signal "when ... enabled"

State	VN1 (stage 101)	VNAux (stage 102)
1	ON	OFF
2	OFF	ON ON
3	<mark>ON</mark>	<b>ON</b>
4	OFF	OFF

**Table 1: Basic Control Voltage Configuration of Uehara Amplifier Stages** 

#### The input RF signal employing carrier aggregation

Term	Petitioner's Construction				
"carrier aggregation"	"simultaneous operation on multiple carriers"				

from an antenna. In some wireless applications, an RF signal may include multiple channels with multiple carrier frequencies. To process such signals, an LNA may send the amplified

improved amplifiers for driving different signal paths. Particular embodiments further provide processing for dual or multi-carrier signals, such as in a wireless receiver.

#### The input RF signal employing carrier aggregation

Term	Petitioner's Construction				
"carrier aggregation"	"simultaneous operation on multiple carriers"				

work 352. The RF signal may include two channels encoded around two different carrier frequencies (i.e., dual carriers), for example. The dual carrier signal may be amplified by

**[0033]** By incorporating one or more additional "Gm" stages when driving multiple output paths, the performance of the amplifier circuit **100** may be maintained across different output loads. Specifically, when driving two output paths simultaneously, a second transconductance stage is enabled to maintain substantially similar gain, Noise Figure ("NF"), linearity, and input impedance matching. In this example, the

#### The input RF signal employing carrier aggregation

#### Patent Owner's Cited Reference (GB 2472978)

and instructs the receiving terminal accordingly. Carrier aggregation mode is also known as spectrum aggregation mode, dual carrier mode and dual cell mode.

#### <u>Uehara</u>

work **352**. The RF signal may include two channels encoded around two different carrier frequencies (i.e., dual carriers), for example. The dual carrier signal may be amplified by

-00047 IPR, Ex. 2017 Abstract (annotated); Ex. 1003 (Uehara) ¶47 (annotated)

#### The input RF signal employing carrier aggregation

Uehara's "dual carriers" are "aggregated"

39. Patent Owner also argues that the Petition ignores the meaning of "aggregation." This is incorrect. When dual carriers are received simultaneously in the amplification circuit of Uehara, they are aggregated at the input. See POR, 30 ("Aggregate means 'to collect together, assemble.""). This is true regardless of whether or not the two carriers originate from a common source, or whether or not they are logically related to one another (e.g., at the baseband level). The two carriers do not somehow travel down separate sides of the wire or avoid one another along the input.

#### The input RF signal employing carrier aggregation

Uehara teaches "higher bandwidth"

increased bandwidth, Uehara also teaches this. Bandwidth is the amount of spectrum available for data transmission. A receiver that operates simultaneously on multiple carriers increases bandwidth because carriers occupy frequency ranges and transmitting data over multiple carriers increases bandwidth to the sum of the carriers' frequency ranges, as would have been understood by a person of ordinary skill in the art at the time of the Patent Owner's alleged conception date for the '356 patent. *See supra* ¶41 at Figure 7 (showing carriers occupying

bandwidth). Uehara teaches that "[t]he RF signal may include *two channels encoded around two different carrier frequencies.*" EX1003-Uehara ¶47 (emphasis added). Uehara's use of two channels provides greater bandwidth than one channel. *See* Section III.C. Specifically, by sending data over two or more

#### The input RF signal employing carrier aggregation

Uehara teaches increased aggregated data rate

Uehara also teaches employing carrier aggregation to increase an 90. aggregated data rate. When the total amount of data entering a wireless device increases, the wireless device (and the user of the device) experiences an "increased aggregated data rate." Uehara discloses "two channels encoded around two different carrier frequencies." EX1003-Uehara ¶47. When non-redundant data is transmitted over these dual carriers, the data rate to the wireless device of Uehara increases because the device is receiving more data per unit of time. This is different than Hirose (EX1024-Hirose), which Patent Owner distinguished during prosecution. Specifically, Uehara does not require the data sent over the dual carriers to be redundant data. See EX1015 at 2 (June 6, 2014 Resp. to Office Action). Moreover, Uehara provides an example of an implementation of an

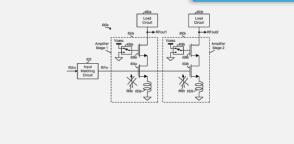
#### The input RF signal employing carrier aggregation

Uehara teaches increased aggregated data rate

Action). Moreover, Uehara provides an example of an implementation of an "Enhanced Data rates for GSM Evolution" wireless system in which an LNA receives a dual carrier signal. EX1003-Uehara ¶48. Uehara selectively couples the "LNA outputs to the two down converters using the current combiner circuits of each LNA as illustrated above." Id. ¶49 (referring to the current combiner circuits 270A of Figure 2A and 303 of Figure 3 (emphasis added)). Down conversion and other circuits "translat[e] the information in each channel of the RF signal into digital data." Id. ¶49. A person of ordinary skill in the art would have understood that the "enhanced data rate" achieved in this implementation in Uehara is an increased data rate.

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		et al.		Patent Date of	No.: Patent:	US 9,154,356 B Oct. 6, 201
		NOISE AMPLIFIERS FOR CARRIER EGATION	(56)		Reference	
CA	5)	rs: Aleksandar Miodrag Tasic, San Diego, CA (US); Anosh Bomi Davierwalla, San Diego, CA (US)		U.S. 1,364 A 15,728 A	10/1975 I	OCUMENTS Langseth et al. Ishikawa et al.
QU/ Dieg		ee: QUALCOMM Incorporated, San Diego, CA (US)		FORE	(Contin	nued)
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		f Classification Search H04L 27/2647; H04L 27/2649; H04L 27/38;	RF signa load circ	l and provi uit when the stage ma	ides <sup>1</sup>	ing a
				transistor.	-	mg a
		455/130, 132, 136, 234.1; 370/542 blication file for complete search history.		20 C	Lala	<b>•</b>

7. The apparatus of claim 1, further comprising:
a feedback circuit coupled between an output and an input of at least one of the first and second amplifier stages.
8. The apparatus of claim 7, the feedback circuit comprising a resistor, or a capacitor, or both a resistor and a capacitor.



-00047 IPR, Ex. 1001 ('356 Patent), Claims 7, 8 (annotated)

**Resistive-Feedback CMOS** Amplifiers for Multiband A

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Multi-Band Anten

CMOS wireless fi achieving input is

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multiband wire

Bevin G. Ferumans, Student Member, IEEE, Jing-Hong C. Zhan, Momber, II Brent R. Carlton, Member, IEEE, and Joy Laskar,

3716

The . Mildandy Index Terms-CMOS low-noise amplifier (LNA), feedback amers, multiband wireless receive

T. INTRODUCTION

OW-NOISE amplifiers (ENAs) occupy a significant per-Contage of the total die area in wireless front-ends today. linearity of relative This is because the performance of the LNA is dependent on the Q's of the multiple on-chip inductors. Since the area requirement of high-O on-chip inductors is high, the die area occupied by the LNA is also high. Often, costly process steps are required to enhance the Q of the on-chip inductors to further improve the performance of RF circuits. The design of these circuits usually requires a higher number of simulation and veri-fication iterations. Cascode amplifiers with inductive source dogeneration [1], the predominant LNA implementation used in

Manuscript received Stytember 1, 2017; revind Jamsey 18, 2008. B. G. Persenant was offst the Gemandrodism Control Laboratory, Bird Con-tomation, Biellow, M. 1972/ELSA, H. Ber sownikh de Cangel Streitmanh. De-ort Technology, Advance, GA 2012 USA, fe-math bringingers, candidation, C. B. 2012, USA and Streit, Streitmann, J. B. C. 2018, was well the Constantiatories Crassis (Jahoreson, BelCony, Marchan, R. J. 2018). A streit of the Constantiatory of the Constantiatory of the Constantiatory of the Constantiatory (Sandrodism). Streit, Medical Streit, Streit, Streit, Streit, Streit, Streit, S. S. Explore and R. K. Challonan, Olf 1972 H. USA. J. Lecker is with the Comparimation theory (Sandrodismo Gaussia Labo-ta, S. Explore and R. K. Challonan, Olf 1972 H. USA. J. Lecker is with the Comparimation theory (Sandrodism). J. Lecker, Sandrodisma, Comparimation, Sandrodisma, Gaussia Labo-and Compare: Englorening, Gaografia Enstitute of Yachundagg, Adlanta, GA 30330 USA. all the required for monce, Multikand multiple norrow quency band, as s tive degeneration and cost will both I been shown to be

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Inductorless resistive-feedback CMOS LNAs [2]–[4] have been shown to be a viable option for implementing multiband receivers, as shown in Fig. 1. These circuits require very small die area and can be implemented in a digital CMOS process without any additional RF enhancements. Hence, this approach can potentially significantly reduce the cost of the wireless front-end implementation. Resistive-feedback LNAs achieve high gain and reasonably low NF [4]. However, novel circuit techniques are required to reduce power consumption and improve linearity.

sive cascade LNAs is I to the pursuit of alternative LNA implementation A multiband receiver can be implemented by using a single moltiband or wideband LNA, as shown in Fig. 1. Cascade LNAs

> Inductorless resistive-feedback CMOS LNAs [2]–[4] have been shown to be a viable option for implementing multiband receivers, as shown in Fig. 1. These circuits require very small

-00047 IPR, Ex. 1008 (Perumana) at 1218-1219 (annotated)

Petitioner's Reply to Patent Owner's Response IPR2019-00047

DOCKET NO.: 0107131-00573USI Filed on behalf of Intel Corporation By: David L. Cavanaugh, Reg. No. 36,476 John V. Hobgood, Reg. No. 61,540 Benjamin S. Fernandez, Reg. No. 55,172 Gregory H. Lautier, *pro hac vice* Wilmer Cuther Pickering Hale and Dorr LLP 1875 Pennsylvania Ave., NW Washington, DC 20006 Tel: (202) 663-6000 Email: David Cavanaugh@wilmerhale.com Ben.Fernandez@wilmerhale.com Gregory.Lautier@@wilmerhale.com

UNITED STATES PATENT AND TRADE

BEFORE THE PATENT TRIAL AND AP

INTEL CORPORATION Petitioner

v. QUALCOMM INCORPORATED Patent Owner

> Case IPR2019-00047 U.S. Patent No. 9,154,356

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

incorrect for the reasons identified above in Section III, Patent Owner does not

dispute that Uehara in view of Perumana teaches each limitation of claims 7 and 8,

but rather argues that Petitioner "fails to sufficiently articulate" why a POSITA

would have combined Perumana and Uehara. POR, 48-50. As evidenced by the

-00047 IPR, Paper 19 (Petitioner's Reply to POR) at 19

DOCKET NO.: 0107131-00573US1 Filed on behalf of Intel Corporation By: David L. Cavanaugh, Reg. No. 36,476 John V. Hobgood, Reg. No. 61,540 Benjamin S. Fernandez, Reg. No. 55,172 Wilmer Cutter Pickering Hale and Dorr LLP 1875 Pennsylvania Ave., NW Washington, DC 20006 Tel: (202) 663-6000 Email: David.Cavanaugh@wilmerhale.com John.Hobgood@wilmerhale.com Ben.Fernandez@wilmerhale.com

UNITED STATES PATENT AND TRADEN

#### BEFORE THE PATENT TRIAL AND AP

INTEL CORPORATION Petitioner

v. QUALCOMM INCORPORATE Patent Owner Case IPR2019-00047

DECLARATION OF PATRICK FA U.S. PATENT NO. 9,154,356 CLAIMS 1, 7, 8, 10, 11, 17, and

118. A person of ordinary skill would have coupled the feedback circuit of Perumana between the output and input of at least one amplifier stage of Uehara. As described in Section III.D.2, feedback circuits were commonly added to low noise amplifiers before the Patent Owner's alleged conception date for the '356 patent in order to improve the stability, input matching, and frequency response of the amplifier. Perumana further explains that adding a feedback circuit to an LNA "can potentially significantly reduce the cost of the wireless front-end implementation" and provides "high gain and reasonably low NF [noise figure]." EX1008-Perumana at 1218-19. A person having ordinary skill in the art would

-00047 IPR, Ex. 1002 (Fay Decl.) at ¶ 118 (annotated)

INTEL 1002

DOCKET NO.: 0107131-00573US1 Filed on behalf of Intel Corporation By: David L. Cavanaugh, Reg. No. 36,476 John V. Hobgood, Reg. No. 61,540 Benjamin S. Fernandez, Reg. No. 55,172 Wilmer Cutter Pickering Hale and Dorr LLP 1875 Pennsylvania Ave., NW Washington, DC 20006 Tel: (202) 663-6000 Email: David.Cavanaugh@wilmerhale.com Ben.Fernandez@wilmerhale.com

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARI

INTEL CORPORATION Petitioner

QUALCOMM INCORPORATED Patent Owner

Case IPR2019-00047

DECLARATION OF PATRICK FAY, Ph.D. U.S. PATENT NO. 9,154,356 CLAIMS 1, 7, 8, 10, 11, 17, and 18

119. A person of ordinary skill in the art would have also found it desirable to increase the bandwidth of the amplifier of Uehara, which could have been achieved using the feedback circuit of Perumana. Compared to alternative configurations, the resistive feedback circuit of Perumana offers broadband operation in a compact die size and without using exotic process options. Uehara concerns simultaneous multi-carrier operation. See EX1003-Uehara ¶7; see also *id.* ¶47. Because the different carriers can be far apart on the frequency spectrum, the amplifier of Uehara benefits from increased bandwidth. Moreover, an amplifier with broader bandwidth would be able to process a greater range of carrier frequencies. Perumana explains that feedback circuits are a "viable option" for wideband and multiband receivers, see EX1008-Perumana at 1218 ("Inductorless resistive-feedback CMOS LNAs [2]-[4] have been shown to be a viable option for implementing *multiband receivers*." (emphasis added)). Thus, a

DOCKET NO.: 0107131-00573US1 Filed on behalf of Intel Corporation By: David L. Cavanaugh, Reg. No. 36,476 John V. Hobgood, Reg. No. 61,540 Benjamin S. Fernandez, Reg. No. 55,172 Gregory H. Lantier, pro hac vice Wilmer Cutler Pickering Hale and Dorr LLP 1875 Pennsylvania Ave., NW Washington, DC 20006 Tel: (202) 663-6000 Email: David.Cavanaugh@wilmerhale.com John Hobgood@wilmerhale.com Ben Fernandez@wilmerhale.com Gregory.Lantier@wilmerhale.com UNITED STATES PATENT AND TRADEMARK OFFIC BEFORE THE PATENT TRIAL AND APPEAL BOARI INTEL CORPORATION Petitioner  $\mathbf{W}_{\mathbf{r}}$ OUALCOMM INCORPORATED Patent Owner Case IPR2019-00047 U.S. Patent No. 9,154,356 DECLARATION OF PATRICK FAY, PH. D. IN SUPPORT PETITIONER'S REPLY Intel v TPR

42 Patent Owner argues that Perumana's statement that "novel circuit techniques are required to reduce power consumption and improve linearity" is an "explicit admonition" that points to disadvantages associated with Figure 3(a) of Perumana. POR, 50. When read in context, however, this statement neither identifies any disadvantages with Figure 3(a) of Perumana, nor presents any inconsistency with the stated reasons to combine or reasonable expectations of success in my initial Declaration or the Petition. Rather, that statement in Perumana merely serves to introduce the additional solution presented in the rest of Perumana's paper. Id. In fact, this quote reinforces the Petition's stated reasons to combine, by demonstrating that a POSITA would have been considering performance (e.g., power consumption, linearity) and implementation cost in implementing feedback circuits, as expressly identified in the Petition's (and my) reasons to combine. Pet., 69-70. This is confirmed by my initial declaration. Ex.

-00047 IPR, Ex. 1039 (Second Fay Decl.) at ¶ 42 (annotated)

# Motivation to Combine Uehara and Youssef

#### Motivation to Combine Uehara and Youssef

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(73)	Assignee:	San Diego, CA (US) 2 QUALCOMM Incorporated, San Diego, CA (US)		(Cor	ntinued)				
(*)	Notice:	Subject to any disclaimer, the term of this patent is extended or adjusted under 35	CN I	IGN PATE	ENT DOCUME	ENTS			L
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	H03G 3/2 H03F 1/2 H03F 3/1	22 (2006.01) 193 (2006.01)	are disclosed. In a first and second a tion (CA) LNA or	n exc mplii		fie	r s	stag	es
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(52)	U.S. CL CPC		radio frequency ( signal to a first lo					-	
		013.01); H03F 3/193 (2013.01); H03F 3/68	enabled. The inpu	t RF					
	(2	2013.01); H03F 3/72 (2013.01); H03G 3/20 (2013.01)	multiple carriers a The second ampli		receives and an	nolifies the in	put		
(58)		Classification Search	RF signal and prov	vides a seco	ond output RF s	signal to a seco	ond		
		04L 27/2647; H04L 27/2649; H04L 27/38; H03H 7/40; H03G 3/20	load circuit when amplifier stage m	ay include	e a gain transis	tor coupled t	o a		
	USPC		cascode transistor						
	See applic	455/130, 132, 136, 234.1; 370/542 cation file for complete search history.	20 0	Claims, 17	7 Drawing She	ets			
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		Matching Circuit							
			311 X	K3					
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 The apparatus of claim 1, further comprising: an attenuation circuit coupled to the first and second amplifier stages and configured to receive the input RF signal.

-00047 IPR, Ex. 1001 ('356 Patent) at Claim 10 (annotated)

### Motivation to Combine Uehara and Youssef

#### Digitally-Controlled RF Passive At CMOS for Mobile TV Tu

Ahmed Youssef and James Haslett Electrical and Computer Engineering Department University of Calgary Alberta, Canada

Abstract-A novel VHF/UHF passive attenuator linearization circuit suitable for mobile TV applications has been designed and implemented in 65 nm CMOS technology. The proposed attenuator has a wide gain range of 48 dB that can be digitally programmed in 3 to 6 dB steps. At every gain setting, the input and output of the attenuator are matched to 50  $\Omega$  to facilitate its integration into mobile TV tuners.

#### I. INTRODUCTION

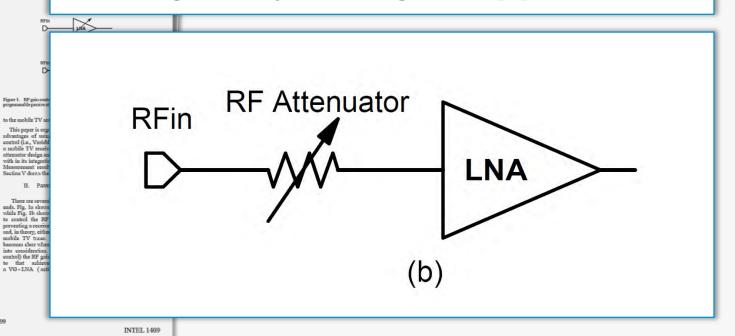
Mobile TV is one of the latest features to be added to cell phones and other hand-held devices. The low cost, low power, and small size demands of this application have pushed researchers to use nanometer CMOS technologies in des igning Figure 1. RF gain high performance tuner chip sets. The bulky RF filters (i.e., programmable passi SAW filters) usually used in traditional TV-can tuers to suppress far-away interferer blockers are thus not an option for these integrated tuners. This results in tightening the linearity requirement of the RF front-end needed for mobile TV reception, and hence demands innovative design techniques to advantages of usi adhere to the low power necessities for this application [1].

The RF-AGC (Automatic gain control) technique has been proposed recently in the literature as one of the low power solutions that can help mobile TV receivers achieve their stringent linearity requirements [2]-[4]. Decreasing the RF gain at large input signal levels helps the receiver pass larger signals without any degradation in the output SNR (Signal-to-Noise Ratio). Although there are many mechanisms to vary the RF gain in receivers, the efficacy of any given mechanism depends on the amount of the dynamic range that can be achieved while decreasing the RF gain.

This paper proposes an RF attenuator linearization circuit used to vary the RF gain of mobile TV receivers while maximizing their dynamic range. The paper describes a passive attenuator designed, implemented in 65 nm CMOS technology and characterized in the lab. Additionally, a 5 bit linear thermometer decoder [5] integrated in the same test chip is used to program the gain of the attenuator. The decoder sets the gain value according to the signal level received at the attemntor input. Also, an on-chip programmable matching network is used to provide a stable 50 ful nput resistance

978-1-4244-5309-2/10/\$26:00 @2010 IEEE

This paper proposes an RF attenuator linearization circuit used to vary the RF gain of mobile TV receivers while maximizing their dynamic range. The paper describes a



-00047 IPR, Ex. 1009 (Youssef) at 1999, Fig. 1(b)

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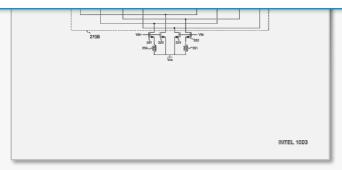
into considera

1999

#### Uehara

-				US 20110217945A1	
	United S Patent A Uehara et a	Application Publicati	on	<ul> <li>(10) Pub. No.: US 201</li> <li>(43) Pub. Date:</li> </ul>	1/0217945 A1 Sep. 8, 2011
(54)	DUAL CARR METHODS	IER AMPLIFIER CIRCUITS AND	(52)	U.S. CL 455/	341; 327/355; 455/334
(76)	Inventors:	Gregory Uehara, Austin, TX (US); Xlaohua Fan, Austin, TX (US)	(57)	ABSTRACT	anna imhríoc a cionit

FIG. 4 shows a system 400 using an amplifier circuit [0048] according to one embodiment. System 400 is an example of an implementation of an Evolved EDGE wireless system. Enhanced Data rates for GSM Evolution ("EDGE") (also known as Enhanced GPRS (EGPRS) or Enhanced Data rates for Global Evolution) is a digital mobile phone technology that enables data transmission across wireless networks such as GSM. In this example, system 400 includes an antenna 401



## Youssef

Digitally-Controlled RF Passive Attenuator in 65 nm CMOS for Mobile TV Tuner ICs

Ahmed Youssef and James Haslett Edward Youssoufian Electrical and Computer Engineering Department Newnort Media Inc. Lake Forest, California, USA. University of Calgary Alberta, Canada Abstract—A novel VHF/UHF passive attenuator linearization circuit suitable for mobile TV applications has been designed

1999

Mobile TV is one of the latest features to be added to cell phones and other hand-held devices. The low cost, low power, and small size demands of this application have pushed researchers to use nanometer CMOS technologies in designing high performance tuner chip sets. The bulky RF filters (i.e.,

their process solutions find can help multiple TV receivers and the at the measure are solution with the rs are given their stringent linearity requirements [2]:[4]. Decreasing the R gain of Lagge input signal levels helps the receiver puss larger signals without any degradation in the output SNR (Signal-to-Noise Ratio). Althreagt there are many mechanisms GAUSCON CONTRACT STREAM CONTRACT STREAM CONTRACT STREAM CONTRACT AND CONTRACT STREAM STREAM CONTRACT STREAM STREAM

technology and classification in the lab. Additionally, a 3 but hear theraumeter decoder [5] integrated in the same test table in a test consistent reaction (200) in them is used to program the gain of the attranstor. The decoder sets entroly the RP gain renths in DR value that is that the renth of the RP gain renths in DR value that is far superior the gain value according to the signal level network of the to that achieved when gain is described by the attenuits in a consistip morgamentalie mething a value value of the D morganic resistance. WG-LNA (astive control), especially at the higher attenuits is used to provide a shift so D flagst resistance.

with in its integration with the rest of the r Measurement results are given in Section IV, and finally

> II. PASSIVE GAIN CONTOL VERSUS ACTIVE GAIN CONTROL

GARCONTOL
Interchasine depends on the assound of the dynamic mage that an head interce with the decreming the RF gain. This paper proposes m RF attenuate linearization discussion of the dynamic activity in the rest sectoral copy to achieve gain standard to control the RF gain. This paper proposes m RF attenuate linearization discussion of the dynamic activity is a standard of the dynamic decoder [5] interactive the dynamic activity is a standard of the dynamic activity of a standard of the dynamic activity is a standard of the dynamic activity of the dynamic activity is a standard of the dynamic activity of the dynam becomes clear when the receiver dynamic range (DR) is taken into consideration. Having the attenuator control (passive

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**INTEL 1409** 

-00047 IPR, Ex. 1003 (Uehara) at [0048] (annotated); -00047 IPR, Ex. 1009 (Youssef) at 1999 (annotated)

## **Fay Declaration**

DOCKET NO.: 0107131-00573US5 Filed on behalf of Intel Corporation By: David L. Cavanaugh, Reg. No. 36,476 John V. Hobgood, Reg. No. 61,540 Benjamin S. Fernandez, Reg. No. 55,172 Wilmer Cutler Pickering Hale and Dorr LLP 1875 Pennsylvania Ave., NW

129. A person of ordinary skill in the art would have coupled an

attenuation circuit of Youssef to the first and second amplifier stages of Uehara to

in order to prevent signal clipping and to suppress interfering signals. As

130. Furthermore, a person of ordinary skill would have been motivated to

couple the attenuation circuit of Youssef to the first and second amplifier stages of

Uehara to increase the receiver linearity (IIP3) and maintain a wide dynamic

range. See EX1009-Youssef at 1999. As Youssef explains, traditional techniques

DECLARATION OF PATRICK FAY, PH.D. U.S. PATENT NO. 9,154,356 CHALLENGING CLAIMS 2, 3, 4, 5, 6, and 10

INTEL 1402

## Youssef

ends. Fig. 1a shows a VG-LNA used to control the RF gain, while Fig. 1b shows a programmable passive attenuator used to control the RF gain. Both techniques are capable of preventing a receiver from clipping at large input signal levels and, in theory, either one can be used to boost the linearity of a mobile TV tuner. However, the difference between them

TV applications presents several challenges. Such an attenuator has to achieve certain characteristics so that it can protect the RF performance of a mobile TV receiver in the presence of interferer blockers as high as 0 dBm. Typically, it

University of Calgary Alberta, Canada

suppress for-may intriferer blockers are thun and an optim for the mobile TV antenus for the entire gain range. These integrated means. This results in tighting the final set of the mobile TV antenus for the entire gain range. This paper is expanded and the RF front-end meeted for mobile TV respins, and hence demands innovative design techniques to advantages of using parsive gain central over antire gain.

Lake Forest, California, USA.

#### V. CONCLUSION

A novel RF attenuator linearization circuit has been proposed to overcome the shortcomings of having the VG-LNA alone control the mobile TV front-end gain. The attenuator designed in 65 nm CMOS technology enables a low power, highly linear, wide dynamic range front-end realization with low noise figure at sensitivity level. The attenuator design can be scaled to any application that requires a wide dynamic range RF front-end.

-00047 IPR, Ex. 1002 (Fay Decl.) at ¶¶ 129, 130 (annotated); -00047 IPR, Ex. 1009 (Youssef) at 1999-2001 (annotated)

DOCKET NO.: 0107131-00573US1 Filed on behalf of Intel Corporation By: David L. Cavanaugh, Reg. No. 36,476 John V. Hobgood, Reg. No. 61,540 Benjamin S. Fernandez, Reg. No. 55,172 Gregory H. Lantier, pro hac vice Wilmer Cutter Pickering Hale and Dorr LLP 1875 Pennsylvania Ave., NW Washington, DC 20006 Tel: (202) 663-6000 Emnail: David Cavanaugh@wilmerhale.com

John.Hobgood@wilmerhale.com Ben.Fernandez@wilmerhale.com Gregory.Lantier@wilmerhale.com

#### UNITED STATES PATENT AND TRADE

#### BEFORE THE PATENT TRIAL AND A

INTEL CORPORATION Petitioner

v. QUALCOMM INCORPORAT Patent Owner

> Case IPR2019-00047 U.S. Patent No. 9,154,356

DECLARATION OF PATRICK FAY, PH. D PETITIONER'S REPLY understood the UHF and VHF carriers described in Youssef to be within the "two channels encoded around two different carrier frequencies (i.e., dual carriers)" in Uehara, and would have understood that receiving carriers at UHF and/or VHF frequencies using the combination of Uehara and Youssef described in the Petition would not have involved changing the capacitance values of C1, C2, or C3 of the attenuation circuit of Youssef.

does not exclude operation on UHF/VHF bands. A POSITA would have

Intel 1039 Intel v. Qualcomm IPR2019-00047

-00047 IPR, Ex. 1039 (Second Fay Decl.) ¶ 44 (annotated)

DOCKET NO .: 0107131-00573US1 Filed on behalf of Intel Corporation By: David L. Cavanaugh, Reg. No. 36,476 John V. Hobgood, Reg. No. 61,540 Benjamin S. Fernandez, Reg. No. 55,172 Gregory H. Lantier, pro hac vice Wilmer Cutler Pickering Hale and Dorr LLP 1875 Pennsylvania Ave., NW Washington, DC 20006 Tel: (202) 663-6000 David Cavanaugh@wilmerhale.com Email: John Hobgood@wilmerhale.com Ben Fernandez@wilmerhale.com Gregory.Lantier@wilmerhale.com UNITED STATES PATENT AND TRADE



BEFORE THE PATENT TRIAL AND AI

v. QUALCOMM INCORPORAT Patent Owner

Case IPR2019-00047 U.S. Patent No. 9,154,356

DECLARATION OF PATRICK FAY, PH. D PETITIONER'S REPLY

Second, tuning RF circuitry (e.g., by selecting capacitance values) is 45. well within the capabilities of a person of ordinary skill in the art. As stated in the Petition, the combination of Uehara with Youssef "could have been implemented with *well-known circuit design and manufacturing techniques* and would have produced predictable results." Pet., 76. In fact, Youssef first describes C1, C2, and C3, in functional/design terms. Ex. 1009, 2001 ("the capacitance values of these capacitors would set the lower frequency limit of the attenuator"). "To support the VHF band, 70 pF and 30 pF capacitances were chosen for the attenuator (C3) and the matching network caps (C1&C2) respectively." Id. The

-00047 IPR, Ex. 1039 (Second Fay Decl.) ¶ 45 (annotated)

3GPP TR 36.912 V9.1.0 (2009-12)

LTE-Advanced extends LTE Rel.-8 with support for Carrier Aggregation, where two or more component carriers (CCs) are aggregated in order to support wider transmission bandwidths up to 100MHz and for spectrum aggregation.

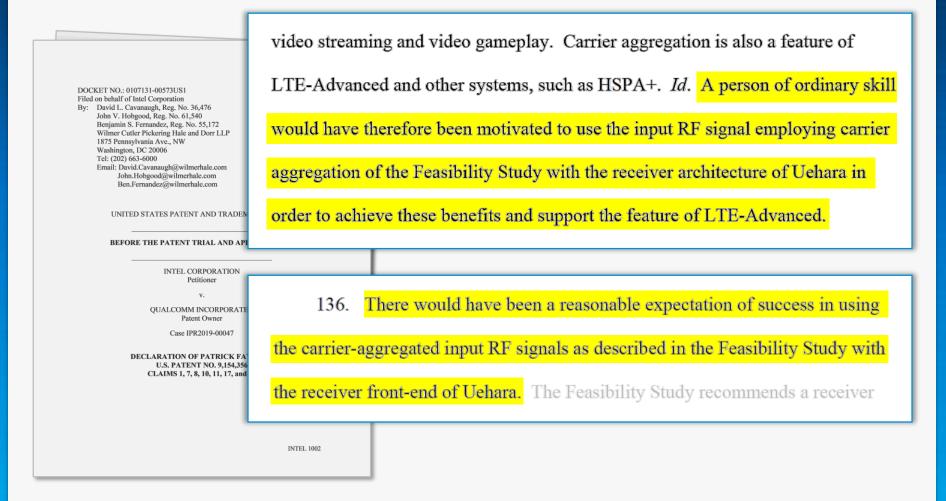
Carrier aggregation is supported for both contiguous and non-contiguous component carriers with each component carrier limited to a maximum of 110 Resource Blocks in the frequency domain using the LTE Rel-8 numerology

It is possible to configure a UE to aggregate a different number of component carriers originating from the same eNB and of possibly different bandwidths in the UL and the DL. In typical TDD deployments, the number of component



-00047 IPR, Ex. 1004 (Feasibility Study) at 8-9 (annotated)

- "[A] POSITA would have found it obvious to turn to the receiver front end of Uehara in order to process the carrier aggregated input RF signal of the Feasibility Study and would have been motivated to combine those references."
  - "The Feasibility Study recognizes that wireless mobile devices can be configured to operate with input RF signals employing carrier aggregation."
  - "The Feasibility Study further suggests that an ideal receiver for noncontiguous intra-band and inter-band carrier aggregation would have multiple RF front-ends."
  - "The Feasibility Study characterizes an "RF front end" as having its own gain control (amplifier), mixer, and analog-to-digital conversion."
  - "Uehara teaches a wireless receiver using multiple signal paths for different carriers, in which each of the multiple signal paths includes its own amplifier, mixer, and analog-to-digital conversion."
  - "Uehara thus teaches the exact type of receiver that the Feasibility Study recognizes would work with signals employing carrier aggregation."

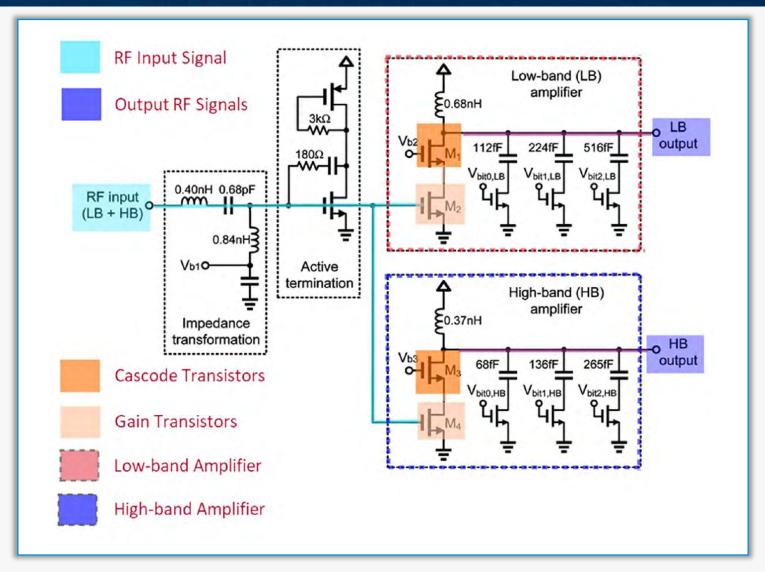


-00047 IPR, Ex. 1002 (Fay Decl.) at ¶¶ 135, 136 (annotated)

# IPR2019-00048 and IPR2019-00049

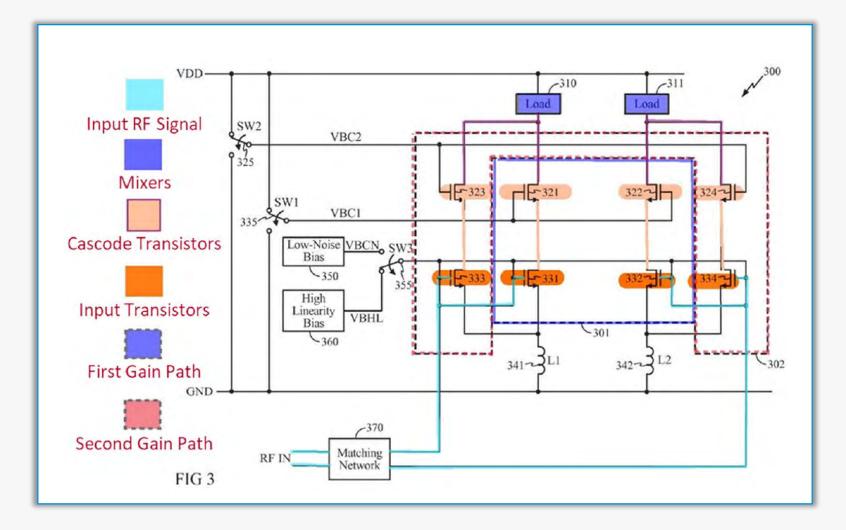
# Overview of Prior Art for IPR2019-00048 and IPR2019-00049

Jeon



-00048 IPR, Paper 3 (Petition) at 35, Fig. 6

Xiong



-00048 IPR, Paper 3 (Petition) at 37, Fig. 3

# Feasibility Study

#### 3GPP TR 36.912 V9.1.0 (2009-12)

Technical Report

3rd Generation Partnership Project; Technical Specification Group Radio Access Network; Feasibility study for Further Advancements for E-UTRA (LTE-Advanced) (Release 9)

LTE-Advanced extends LTE Rel.-8 with support for *Carrier Aggregation*, where two or more *component carriers* (CCs) are aggregated in order to support wider transmission bandwidths up to 100MHz and for spectrum aggregation.

The present document has been developed within the 34	<sup>6</sup> Generation Partnership Project (3GPP <sup>TM</sup> )	and may be further elaborated for the purposes of
The present document has not been subject to any approv This Specification is provided for future development we Specifications and reports for implementation of the 3GP	rk within 3GPP only. The Organizational P	artners accept no liability for any use of this Specific
	i	INTEL 1104

-00048 IPR, Ex. I 104 (Feasibility Study) at 8 (annotated)

# Youssef

#### Digitally-Controlled RF Passive At CMOS for Mobile TV Tu

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Ahmed Youssef and James Haslett Electrical and Computer Engineering Department University of Calgary Alberta, Canada

Abstract—A morel VMFR/HE passive attenuator linearization circuit suitable for mobile TV applications has been designed and implemented in 6.6 km CMOS releatings. The proposed attenuator has a wide gain range of 46 dB that can be digitally programmed Ia 30 to 6 dB stops. At every gain setting, the input and output of the attenuator are matched to 59  $\Omega$  to facilitate its information.

#### I. INTRODUCTION

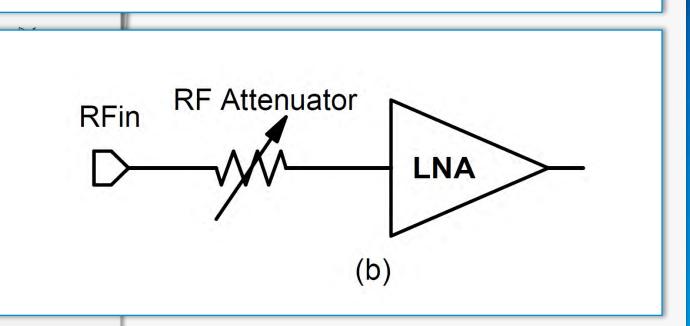
Mobile TV is one of the latest features to be added to cell phones and other hand-held devices. The low cost, low power, and small size demands of this application have pushed researchers to use nanometer CMOS technologies in designing Figure 1. RF gain or researchers to use nanometer CMUS technologies in designing high performance tunce chip sets. The bully RF filters (i.e., SAW filters) usually used in traditional TV-can tuners to suppress far-away interferer blockers are thus not an option for these integrated tuners. This results in tightening the linearity requirement of the RF front-end needed for mobile TV. to the mobile TV ar This paper is org reception, and hence demands innovative design techniques to adhere to the low power necessities for this application [1]. advantages of usin control (i.e., Variab a mobile TV receiv

The RF-AGC (Automatics in an organization (1)) been proposed recently in the literature as one of the low been proposed recently in the literature as one of the low their stringent literative regariments [2](4d) Decrements Regres signals without any degradation in the output SNR (Signal-b-Noise Ratio). Although there are many mechanisms to vary the RF gain in receivers, the efflacey of any given attenuator design a with in its integrat Measurement re Section V draws th mechanism depends on the amount of the dynamic range that can be achieved while decreasing the RF gain.

ends. Fig. 1a shows while Fig. 1b shows to control the RF can be antword whate decreasing the RF gain. This paper proposes an RF attenuated inscription circuit while FR gain of mobile TV receivers while maximizing their dynamic range. The paper descriptions and minory, either theory, either the chronology and characterized in the lab. Additionally, a 5 bit insert thermometer decoder [5] insignal level received in the achieve a VG-LNA (actine attenuate) and the achieve a VG-LNA (actine attenuate) and the source of th

978-1-4244-5309-2/10/\$26.00 © 2010 IEEE

This paper proposes an RF attenuator linearization circuit used to vary the RF gain of mobile TV receivers while maximizing their dynamic range. The paper describes a



-00048 IPR, Ex. 1109 (Youssef) at 1999, Fig. 1(b)

1009

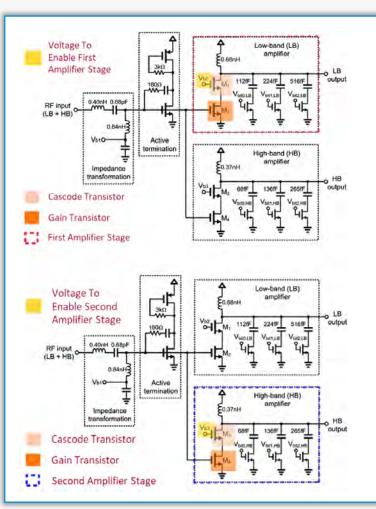
# Disputed Issues for IPR2019-00048 and IPR2019-00049

# Disputed Issues for IPR2019-00048 and IPR2019-00049

- Obviousness Based on Jeon and Xiong
  - Claims 1, 2-8, 11, 17, 18
- Motivation to Combine Jeon, Xiong, and Youssef
  - Claims 9 and 10
- Motivation to Combine Jeon, Xiong, and Feasibility Study
  - Claims 1, 2-11, 17, 18

#### Configured to be independently enabled or disabled

Jeon



-00048 IPR, Paper 19 (Petitioner's Reply to POR) at 7

#### **Configured to be independently enabled or disabled**

#### Jeon

REFERENCES OF DESCRIPTION OF THE OTHER ADDRESS OF THE PARTY OF THE PAR

A Scalable 6-to-18 GHz Concurrent Dual-Band Quad-Beam Phased-Array Receiver in

Sanggeun Jeon, Member, IEEE, Yu-Jia Wang, Student Member, IEEE, Hi Florian Bohn, Student Member, IEEE, Arun Natarajan, Aydin Babakhani, Mem Ali Hajimiti, Member, IEEE

Abitrari-This paper reports a 640-35 GIL integrated phases arrays receive implemented in 1.04mm CMOS The neuriner is conserved by more first integrated phases. In the originate modules and then is requestered by more independent bases at its offeren-fere production from 6 to 18 GUL. The module constant is used from the recoiver angle from the 34 GUL The module constant is used from the recoiver angle from the 34 GUL the results of the sector of the sector requestion of the 34 GUL the module constant is used from the recoiver angle from the 34 GUL the results of the sector of the sector methods of the sector of the sector of the sector of the sector method of the sector of the sector of the sector of the sector method of the sector of the sector of the sector of the sector method of the sector of the sector of the sector of the sector method of the sector of the sector of the sector of the sector method of the sector of the sector of the sector of the sector method of the sector method of the sector method of the sector method of the sector method of the sector of

Integrated CMOS solutions of reduction in cost and size of suc Index Torms--CMOS, concurrent, large-scale phased arrays, aulti-band, multi-beam, phased arrays, scalable, tritave. reprotobility of silicon H's ollow

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P HASED ampo sizer the beam direction electronically, transmitter [11], all at 24 GHz m phased-amoy transcriver at 77 G heinskan unge beer me endar diectom eczetatoscap beinging mange benefits each is high distortificij, inter-ference rojoution, signel-boroise ratio improvement, and fast somning response [1]-[4]. For the reason, hussed aucage have been ecknowledy employed in rather and communication spa-tems in the area of military, space, and radio autoeousy since their advest in the 1950s [5], [6], Recently, oriestantial atten-tions in the area (the space space space space space space space their advest in the 1950s [5], [6], Recently, oriestantial attenproach in silicon reduces the out compared to the conventional compound semiconductors There is a trend in radar and or transociver operates concurrently tion is also drawn in civil applications including high-speed point-to-point communications and car radaes [4], [7]. taskennase, transcriver to operate in a wid transcriver to operate in a wide These trends also apply to phat Benefits of phased arrays increase with the number of ele-

ments combined in the array. This gives zize to the desize to gets must be tracked at the as make very large-scale phased arrays (up to 10<sup>6</sup> elements) for countermetsure systems or wi man very sugression music annys top to dr canning top slightprecision rankes, long-mapping sensors, or high-directricity communication systems. One of the major obstaels in imple-menting large scale phased arrays lies in the high complexity and cost to assumble the which array system. Tachtifoxally, phased-array systems have been built using a module-based annuments. Music transmissioned area and the sense of the systems to the sense of the systems in the sense of the Most transmitten/receiver components, such as

Minimum right resoluted from the "Allish resolution of the Allish dimension from the Allish dimension of the Allish dimension ment on a single CMOS chip. The sectiver is programmable to concurrently receive two RF frequencies between 6 and 18 GHz (a tritave) while forming four independently-controlled beams

Vol. Wang, H. Wang, F. Behn, A. Bubakhasi, and A. Hajimini are with a Degaritment of Educational Engineering, California Institute of Technology. conduct, CA 91123 USA.

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have been reported a CMOS RF1 Si-hazed phased-array meetizer []

countermeasure systems or what are desired at multiple frequest

high integration combility of Ch tion to achieve the widehand plur tionalities. Several widehand plur

[15], [16] and transcalver [17] in However, none of the environs w ever, none of the prov

connext mailti-basel multi-beam n

In this work, we integrated RI-concurrent dual-band quad-beam phased-array specifier ele

with separate phase shifting operation. The receiver is also easily scalable toward very largo-scale phased amays because additional receiver chips can be added to increase the number

INTEL 1105

in a wide range of RF freque

The RF signals at two frequencies are then selectively amplified by two separate cascode amplifiers  $(M_1 - M_2, M_3 - M_4)$ that have tunable LC output loads. A 3-bit switched capacitor bank at each output load is tuned to cover the entire LB and HB frequencies. This allows for the digital tuning of the amplifier so that it can provide the maximum gain at the desired frequency while attenuating out-of-band signals prior to the first down-conversion.

-00048 IPR, Ex. 1105 (Jeon) at 2665 (annotated)

#### Configured to be independently enabled or disabled

DOCKET NO.: 0107131-00573US2 Filed on behalf of Intel Corporation By: David L. Cavanaugh, Reg. No. 36,476 John V. Hobgood, Rog. No. 61,540 Benjamin S. Fernandez, Reg. No. 55,172 Gregory H. Lantier, *pro hac vice* Wilner Cutter Pickering Hale and Dorr LLP 1875 Pennsylvania Ave., NW Washington, DC 20006 Tel: (202) 663-6000 Email: David.Cavanaugh@wilmerhale.com John.Hobgood@wilmerhale.com Ben.Fernandez@wilmerhale.com

Jeon

UNITED STATES PATENT AND TRADEMARK OF

INTEL CORPORATION Petitioner v.

QUALCOMM INCORPORATED Patent Owner Case IPR2019-00048

U.S. Patent No. 9,154,356

DECLARATION OF PATRICK FAY, PH.D. IN SUPP PETITIONER'S REPLY Each of the amplifier stages identified, above, is *configured* to be independently enabled or disabled at least in part due to the presence of distinct voltage signals  $(V_{b2} \text{ and } V_{b3})$  used to enable respective cascode transistors (M<sub>1</sub> and M<sub>3</sub>). Ex. 1105, FIG. 6. My initial declaration explained that because Jeon uses two separate voltages to enable two separate cascode transistors, a POSITA "would have known the input voltage  $V_{b2}$  [(or  $V_{b3}$ )] allows the first amplifier stage [(or second amplifier stage)] to be configured to be independently enabled or disabled". Ex. 1102, ¶¶80, 94. Further, during operation Jeon explicitly teaches that "RF signals" at two frequencies are then *selectively* amplified by two separate cascode

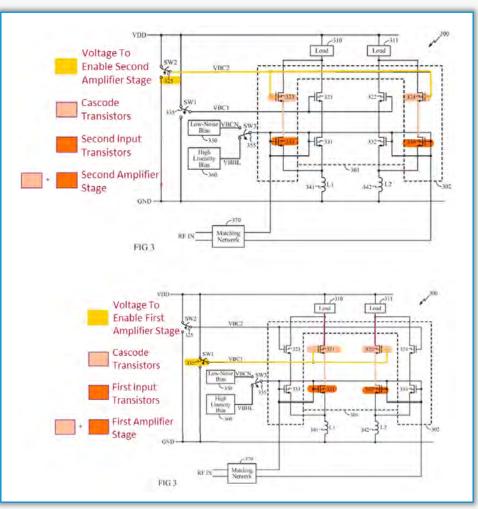
amplifiers (M<sub>1</sub>–M<sub>2</sub>, M<sub>3</sub>–M<sub>4</sub>)"—showing that each amplifier can be enabled or

disabled independently. Ex. 1105, 2665.

-00048 IPR, Ex. I I 39 (Second Fay Decl.) ¶ 30 (annotated)

#### Configured to be independently enabled or disabled

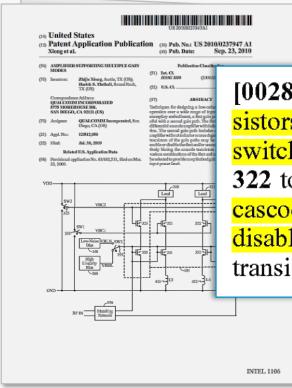
<u>Xiong</u>



-00048 IPR, Paper 19 (Petitioner's Reply to POR) at 9

# Configured to be independently enabled or disabled

## <u>Xiong</u>



[0028] As further shown in FIG. 3, the first cascode transistors 321, 322 may be selectively enabled or disabled by a switch SW1 335, which pulls the gates of the transistors 321, 322 to either a high or a low voltage. Similarly, the second cascode transistors 323, 324 may be selectively enabled or disabled by a switch SW2 325, which pulls the gates of the transistors 323, 324 to either a high or a low voltage.

### Configured to be independently enabled or disabled

## <u>Xiong</u>

However, Patent Owner's singling out of a single use case of the circuitry of Xiong fails to rebut the Petition's showing that the amplifier stages of Xiong are *configured* to be independently enabled or disabled. Each amplifier stage in Figure 3 of Xiong, as identified in my initial declaration, has its own switch (325 and 335) to supply a voltage (VBC1 and VBC2) to respective cascode transistors (321/322 and 323/324). Ex. 1106, ¶28. A POSITA would understand that Xiong teaches at least four operational/control states, which I have listed in Table 1 below:

State	SW1 335 (VBC1)	SW2 325 (VBC2)
1	ON	OFF
2	OFF	ON
3	ON	ON
4	OFF	OFF

Table 1: Basic Control Voltage Configuration of Xiong Amplifier Stages

-00048 IPR, Ex. I 139 (Second Fay Decl.) at ¶ 35 (annotated)

#### **Motivation to Combine Jeon and Xiong**

DOCKET NO.: 0107131-00573US2 Filed on behalf of Intel Corporation By: David L Cavanaugh, Reg. No. 36,476 John V. Hobgood, Reg. No. 61,540 Benjamin S. Fernandez, Reg. No. 55,172 Wilmer Cutter Pickering Hale and Dorr LLP 1875 Pennsylvania Ave., NW Washington, DC 20006 Tet: (202) 663-6000 Email: David.Cavanaugh@wilmerhale.com Ben.Fernandez@wilmerhale.com

> UNITED STATES PATENT AND TRADEN BEFORE THE PATENT TRIAL AND API INTEL CORPORATION Petitioner V. QUALCOMM INCORPORATE Patent Owner Case IPR2019-00048 DECLARATION OF PATRICK FA U.S. PATENT NO. 9,154,356 CLAIMS 1, 9, 10, 17, and 18

83. A person of ordinary skill in the art would have added the switches that enable or disable amplifier stages in Xiong to the dual-cascode amplifier in Jeon. Adding switches would permit the amplifier of Jeon to independently enable or disable each amplifier stage whether or not any other amplifier stage is enabled or disabled. Modifying Jeon to include the switches of Xiong also would have permitted Jeon to operate in multiple modes, while consuming less power. *See* EX1106-Xiong ¶27-30 (teaching multiple modes of operation), 34 ("[P]rovision of the switch SW1 335, along with SW2 325, may advantageously allow the entire LNA 400 to be powered on or off when desired."). Jeon teaches a tunable

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-00048 IPR, Ex. I 102 (Fay Decl.) at ¶ 83 (annotated)

#### **Motivation to Combine Jeon and Xiong**

DOCKET NO.: 0107131-00573US2 Filed on behalf of Intel Corporation By: David L. Cavanaugh, Reg. No. 36,476 John V. Hobgood, Reg. No. 61,540 Benjamin S. Fernandez, Reg. No. 55,172 Wilmer Cutter Pickering Hale and Dorr LLP 1875 Pennsylvania Ave., NW Washington, DC 20006 Tet: (202) 663-6000 Email: David Cavanaugh@wilmerhale.com Ben.Fernandez@wilmerhale.com

#### UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEL CORPORATION Petitioner

v. QUALCOMM INCORPORATED Patent Owner

Case IPR2019-00048

DECLARATION OF PATRICK FAY, PH.D. U.S. PATENT NO. 9,154,356 CLAIMS 1, 9, 10, 17, and 18

INTEL 1102

2660. Thus, Jeon implicitly teaches that concurrent dual-band operation is not needed in some cases, such that either the HB or the LB amplifier would remain unused. Xiong teaches enabling and disabling different amplifier stages for different modes of operation. *See* EX1106-Xiong ¶27-30 (teaching a "high linearity" and a "low noise" mode). Specifically, Xiong explains that different input RF signals may benefit from different amplifier characteristics, such as a low power signal benefiting from a high-gain, low noise LNA, and a high-power signal benefiting from good linearity to avoid distortion. *See id.* ¶5. Xiong uses independently enabled or disabled amplifier stages to achieve these different modes depending on the characteristics of the input signal (i.e. power level).

-00048 IPR, Ex. I 102 (Fay Decl.) at ¶ 83 (annotated)

#### **Motivation to Combine Jeon and Xiong**

DOCKET NO.: 0107131-00573US2 Filed on behalf of Intel Corporation By: David L. Cavanaugh, Reg. No. 36,476 John V. Hobgood, Reg. No. 61,540 Benjamin S. Fernandez, Reg. No. 55,172 Gregory H. Lantier, pro hac vice Wilmer Cutler Pickering Hale and Dorr LLP 1875 Pennsylvania Ave., NW Washington, DC 20006 Tel: (202) 663-6000 Email David Cavanaugh@wilmerhale.com John Hobgood @wilmerhale.com Ben Fernandez@wilmerhale.com Gregory Lantier@wilmerhale.com UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD INTEL CORPORATION Petitioner w. OUALCOMM INCORPORATED Patent Owner Case IPR2019-00048 U.S. Patent No. 9,154,356 DECLARATION OF PATRICK FAY, PH.D. IN SUPPORT OF PETITIONER'S REPLY

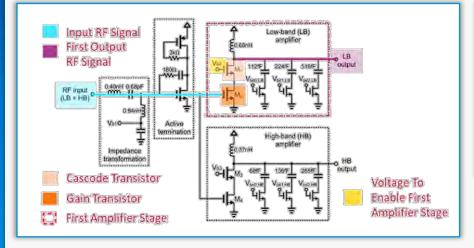
> Intel 1139 Intel v. Qualcomm IPR2019-00048

42. Patent Owner also mischaracterizes the motivation to combine to require adding more from Xiong to Jeon than argued in the Petition. As stated in the Petition, a POSITA would have found it obvious to use Xiong's switches to "selectively enable or disable" Jeon's cascode transistors to save power. *See* Pet., 47-49; Ex. 1102, ¶83-86. Contrary to Patent Owner's arguments on pages 45-46 of the POR, the Petition does not rely (nor does it need to rely) on Xiong's discussions that are specific to its adding/subtracting gain paths. Pet., 47-49. In other words, a POSITA would have understood how to modify the amplifier stages of Jeon using the switching topology of Xiong to make them "selectively enabled or disabled" to save power as taught by Xiong, and would not have been deterred

-00048 IPR, Ex. I 139 (Second Fay Decl.) at ¶ 42 (annotated)

# Providing a first/second output RF signal to a first/second load circuit

#### First Output RF Signal

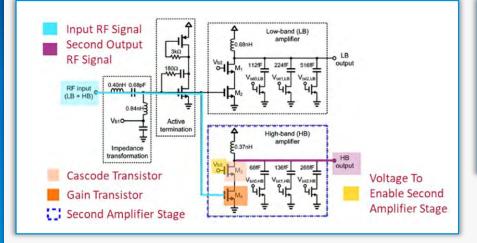


presented in Fig. 4. Since it is a concurrent dual-band receiver, the incoming RF signal contains two frequencies at LB and HB respectively, and feeds a front-end tunable concurrent amplifier (TCA). The TCA amplifies, filters, and finally splits the RF signal into two separate outputs; one at LB and the other at HB. Each of the two signals goes through separate double down-conversion by subsequent RF and IF mixers. The IF mixers generate the I and Q components of the

-00048 IPR, Paper 3 (Petition) at 49; -00048 IPR, Ex. I 105 (Jeon) at 2663 (annotated)

# Providing a first/second output RF signal to a first/second load circuit

#### Second Output RF Signal



presented in Fig. 4. Since it is a concurrent dual-band receiver, the incoming RF signal contains two frequencies at LB and HB respectively, and feeds a front-end tunable concurrent amplifier (TCA). The TCA amplifies, filters, and finally splits the RF signal into two separate outputs; one at LB and the other at HB. Each of the two signals goes through separate double down-conversion by subsequent RF and IF mixers. The IF mixers generate the I and Q components of the

-00048 IPR, Paper 3 (Petition) at 58; -00048 IPR, Ex. I 105 (Jeon) at 2663 (annotated)

# Providing a first/second output RF signal to a first/second load circuit

DOCKET NO.: 0107131-00573US2 Filed on behalf of Intel Corporation By: David L. Cavanaugh, Reg. No. 36,476 John V. Hobgood, Reg. No. 61,540 Benjamin S. Fernandez, Reg. No. 55,172 Gregory H. Lantier, pro hac vice Wilmer Cutler Pickering Hale and Dorr LLP 1875 Pennsylvania Ave., NW Washington, DC 20006 Tel: (202) 663-6000 David Cavanaugh@wilmerhale.com John Hobgood awilmerhale.com Ben Fernandez@wilmerhale.com Gregory Lantier@wilmerhale.com UNITED STATES PATENT AND TRADE BEFORE THE PATENT TRIAL AND AP INTEL CORPORATION Petitioner w. OUALCOMM INCORPORAT Patent Owner Case IPR2019-00048 U.S. Patent No. 9,154,356

> DECLARATION OF PATRICK FAY, PH.D. PETITIONER'S REPLY

Patent Owner's argument that Xiong only teaches a single amplifier 44. with a single load is beside the point, because the Petition relies on Xiong for only the switches SW1 335 and SW2 325 and not for the load circuits 310 and 311. Pet., 44-49, 50-51, 56-58, 59-60. Jeon already teaches outputting the first and second output RF signals (LB output and HB output) to separate load circuits. Ex. 1105, 2663. Modifying Jeon to include the switches of Xiong would not change the output of the amplifier stages, which would continue to be provided to separate loads when the cascode transistors M<sub>1</sub> and M<sub>3</sub> of Jeon are enabled by the switches of Xiong. Pet., 44-49, 50-51, 56-58, 59-60.

-00048 IPR, Ex. I I 39 (Second Fay Decl.) at ¶ 44 (annotated)

## The input RF signal employing carrier aggregation

Term	Petitioner's Construction
"carrier aggregation"	"simultaneous operation on multiple carriers"

#### <u>Jeon</u>

concurrent amplifier in Figure 6 is "a dual-band signal containing two different

*frequencies* concurrently, one in the *low band* (LB) from 6 to 10.4 GHz and the

other in the high band (HB) from 10.4 to 18 GHz." Ex. 1105, 2662. When the

-00048 IPR, Ex. I 139 (Second Fay Decl.) at ¶ 46 (annotated)

#### The input RF signal employing carrier aggregation

DOCKET NO.: 0107131-00573US2 Filed on behalf of Intel Corporation By: David L. Cavanaugh, Reg. No. 36,476 John V. Hobgood, Reg. No. 61,540 Benjamin S. Fernandez, Reg. No. 55,172 Wilmer Cutter Pickering Hale and Dorr LLP 1875 Pennsylvania Ave., NW Washington, DC 20006 Tel: (202) 663-6000 Email: David Cavanaugh@wilmerhale.com Ben.Fernande@wilmerhale.com

#### UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEL CORPORATION Petitioner

QUALCOMM INCORPORATED Patent Owner

Case IPR2019-00048

DECLARATION OF PATRICK FAY, PH.D. U.S. PATENT NO. 9,154,356 CLAIMS 1, 9, 10, 17, and 18

INTEL 1102

18 GHz." EX1105-Jeon at 2662 (emphasis added). Low-band and high-band frequency ranges comprise different, non-overlapping carriers, as acknowledged by the '356 patent and as was known well before the '356 patent. See EX1101-'356-Patent at 2:59-63 ("Low-band, mid-band, and high-band refer to three groups of bands (or band groups), with each band group including a number of frequency bands (or simply, 'bands') ... Each band ... includes one or more carriers."). This means that the dual-band input RF signal necessarily contains two carriers at different frequencies. Jeon thus teaches an input RF signal comprising transmissions sent on multiple carriers at different frequencies. Furthermore, Jeon teaches the input RF signal employing carrier aggregation because it describes receiving "a dual-band signal containing two different frequencies concurrently," as required for simultaneous operation on multiple carriers. EX1105-Jeon at 2662 (emphasis added). Finally, Jeon teaches that the multi-carrier signal is sent to a wireless device because the signal is transmitted, and received, wirelessly by a receiver.<sup>16</sup> See EX1105-Jeon at 2660, 2662.

-00048 IPR, Ex. I 102 (Fay Decl.) at ¶ 89 (annotated)

### The input RF signal employing carrier aggregation

#### Patent Owner's Cited Reference (GB 2472978)

and its expert rely for their construction teaches that "*Carrier aggregation mode* is

also known as spectrum aggregation mode, dual carrier mode and dual cell

#### <u>Jeon</u>

concurrent amplifier in Figure 6 is "a dual-band signal containing two different

*frequencies* concurrently, one in the *low band* (LB) from 6 to 10.4 GHz and the

other in the high band (HB) from 10.4 to 18 GHz." Ex. 1105, 2662. When the

-00048 IPR, Ex. I I 39 (Second Fay Decl.) at ¶ 46 (annotated)

### The input RF signal employing carrier aggregation

#### Jeon's dual carriers are "aggregated"

47. Patent Owner further argues that the Petition ignores the meaning of "aggregation." POR, 46. This is incorrect – when dual carriers are received simultaneously in the amplification circuit of Jeon, they are aggregated at the single input of the TCA of Jeon. See POR, 30 ("Aggregate means 'to collect together, assemble.""). This is true regardless of whether or not the two carriers originate from a common source, or whether or not they are logically related to one another (e.g., at the baseband level). The two carriers do not somehow travel down separate sides of the wire or avoid one another along the input.

-00048 IPR, Ex. I 139 (Second Fay Decl.) at ¶ 47 (annotated)

#### The input RF signal employing carrier aggregation

Jeon teaches "higher bandwidth"

for data transmission. A receiver that operates simultaneously on multiple carriers increases bandwidth because carriers occupy frequency ranges and transmitting data over multiple carriers increases bandwidth to the sum of the carriers' frequency ranges, as would have been understood by a person of ordinary skill in the art at the time of the Patent Owner's alleged conception date for the '356 patent. See supra ¶ 41 at Fig. 7 (showing carriers occupying bandwidth); see also EX1101-'356-Patent at 1:32-35 (noting that a "carrier may refer to a range of frequencies"), Figs. 2A-2D (showing carriers occupying bandwidth). Jeon teaches "a dual-band signal containing two different frequencies concurrently." EX1105-Jeon at 2662. Jeon's use of two frequency channels provides greater bandwidth than one channel. See Section III.C. Specifically, by sending data over two or more carriers, the bandwidth for data transmission necessarily increases to the sum of the first carrier's frequency range and the second carrier's frequency range.

#### -00048 IPR, Ex. I 102 (Fay Decl.) at ¶ 90 (annotated)

#### The input RF signal employing carrier aggregation

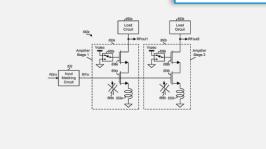
Jeon teaches increased aggregated data rate

91. Jeon also teaches employing carrier aggregation to increase an aggregated data rate. When the total amount of data entering a wireless device increases, the wireless device (and the user of the device) experiences an "increased aggregated data rate." Jeon discloses an "incoming RF signal [that] contains two frequencies at LB and HB respectively." EX1105-Jeon at 2663. When non-redundant data is transmitted over these two frequencies, the data rate to the wireless device of Jeon increases because the device is receiving more data per unit of time. This is different than Hirose (EX1124-Hirose), which the Patent Owner distinguished during prosecution. Specifically, Jeon does not require the data sent over the dual carriers to be redundant data. See EX1115 at 2 (June 6, 2014 Resp. to Office Action). A person having ordinary skill in the art would have

#### Claim 3

US 9,154,356 B Oct. 6, 201		(10) Patent N (45) Date of P	United States Patent Tasic et al.	(12)
s Cited	Reference	(56)	LOW NOISE AMPLIFIERS FOR CARRIER AGGREGATION	(54)
DCUMENTS ingseth et al.	10/1975 La	3,911,364 A	Inventors: Aleksandar Miodrag Tasic, San Diego, CA (US); Anosh Bomi Davierwalla,	(75)
hikawa et al.	7/1977 Isl (Continu	4,035,728 A	San Diego, CA (US)	
			Assignce: QUALCOMM Incorporated, San Diego, CA (US)	(73)
DOCUMENTS 8/2004 2/2007	912 A	CN 15239	Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days,	(*)
	_(Continu			(21)
	UE .	OTH	**	(22)
		International Search Re		(65)
3.		042726—ISA/EPO—Oc	US 2013/0315348 A1 Nov. 28, 2013 Related U.S. Application Data	
э.		Primary Examiner —	Provisional application No. 61/652,064, filed on May 25, 2012.	(60)
com and	() xx Eil m iz	(74) Attorney, Agent, (57) Low noise amplifiers are disclosed. In an ex- first and second ampl- tion (CA) LNA or a m LNA. The first amplifi	Int. CL.           H041. 2704         (2006.01)           H044. 2704         (2006.01)           H045. 2704         (2006.01)           H045. 2704         (2006.01)           H045. 1702         (2006.01)           H045. 3703         (2006.01)           (Continued)         (Continued)	
	ci F ff	radio frequency (RF) signal to a first load c enabled. The input RF multiple carriers at dif The second amplifier	<ul> <li>U.S. CL</li> <li>CPC</li></ul>	
indu	s. ir	RF signal and provide load circuit when the amplifier stage may i cascode transistor. 20 Clai	<ul> <li>Field of Classification Search CPC . H04L 27/2649; H04L 27/2649; H04L 27/38; H03H 7/40; H03G 3/20 USPC</li></ul>	(58)

**3**. The apparatus of claim **2**, the first amplifier stage further comprising a first inductor coupled to the first gain transistor, and the second amplifier stage further comprising a second inductor coupled to the second gain transistor.



-00049 IPR, Ex. 1201 ('356 Patent) at Claim 3 (annotated)

#### **Obviousness Based on Jeon and Xiong**

#### Claim 3

DOCKET NO.: 010/131-005/3US3 Filed on behalf of Intel Corporation By: David L. Cavanaugh, Reg. No. 36,476 John V. Hobgood, Reg. No. 61,540 Benjanin S. Fernandez, Reg. No. 55,172 Wilmer Cutter Pickering Hale and Dorr LLP 1875 Pennsylvania Ave., NW Washington, DC: 20006 Tel: (202) 663-6000 Email: David Cavanaugh@wilmerhale.com John Hobgood@wilmerhale.com Ben Fernandez@wilmerhale.com

#### UNITED STATES PATENT AND TRADEMARK OFFICE

#### BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEL CORPORATION Petitioner

QUALCOMM INCORPORATED

Patent Owner

Case IPR2019-00049

DECLARATION OF PATRICK FAY, PH.D. U.S. PATENT NO. 9,154,356 CLAIMS 2-8 and 11

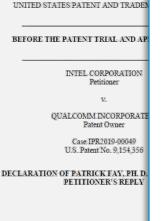
INTEL 1202

106. As described above, a person of ordinary skill would have attached a first inductor to the first gain transistor of Jeon, according to the teaching of Xiong. A person of ordinary skill would have also coupled a second inductor to a second gain transistor in Jeon to achieve the same benefits of impedance matching with low noise figure as is achieved for the first amplifier stage according to the teaching of Xiong. In particular, the amplifier stages of Jeon are shown to be separate amplifiers providing different outputs. See EX1205-Jeon at 2663, Fig. 6. Moreover, Jeon shows that the two outputs are in different frequency bands. See id. (showing "LB" low-band output and "HB" high-band output). A person of ordinary skill would have understood that amplifiers providing different outputs could benefit from the use of different inductance values, particularly if those outputs were targeted to cover different frequency ranges as in Jeon. The impedance matching conditions required for optimal low noise amplifier operation are a function of frequency, and so the choice of source degeneration inductance is also a function of the intended amplifier frequency of operation.

### **Obviousness Based on Jeon and Xiong**

#### Claim 3

DOCKEF NO.: 010/131-00573US3 Filed on behalf of Intel Corporation By: David L. Cavanaugh, Reg. No. 36,476 John V. Hobgood, Reg. No. 61,540 Benjamin S. Fernandez, Reg. No. 55,172 Gregory H. Lantier, pro hac vice Wilmer Cutler Pickering Hale and Dorr LLP 1875 Pennsylvania Ave., NW Washington, DC: 20006 Tel: (202) 663-6000 Email: David Cavanaugh/@wilmerhale.com John Hobgood@wilmerhale.com Ben Fernandez@wilmerhale.com Gregory.Lantier@wilmerhale.com



¶104-07. Patent Owner asserts that "Petitioner fails to sufficiently articulate a motivation to select and combine the references in this manner to improve the input impedance." POR, 49. To the contrary, the Petition, at pages 65-66, articulated several reasons to combine the references in the manner claimed: (1) source degeneration inductors were well-known and among the finite number of alternatives used to provide impedance matching, (2) source degeneration inductors would have improved similar systems in the same way (e.g., to improve linearity, Ex. 1206, ¶32), and (3) there was reasonable expectation of success involving well-known circuit design and manufacturing techniques that would have produced predictable results. See also Ex. 1202, ¶¶104-05. Patent Owner does not rebut any of these reasons.

-00049 IPR, Ex. 1239 (Second Fay Decl.) at ¶ 50 (annotated)

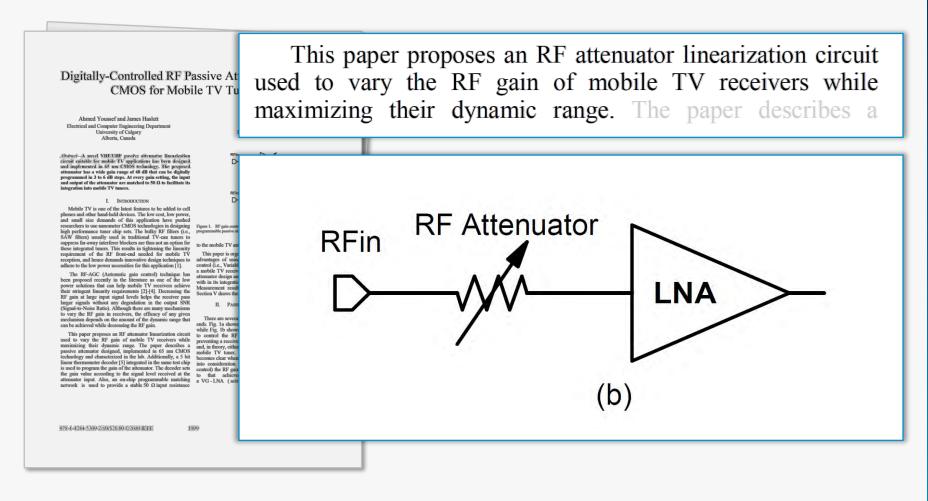
#### **Claims 9, 10**

(12) United States Patent (10) Patent N Tasic et al. (45) Date of Pa (54) LOW NOISE AMPLIFIERS FOR CARRIER (56) AGGREGATION U.S. F Inventors: Aleksandar Miodrag Tasic, San Diego, CA (US); Anosh Bomi Davierwalla, San Diego, CA (US) 3,911,364 A 4,035,728 A (73) Assignce: QUALCOMM Incorporated, San Diego, CA (US) FOREIG Subject to any disclaimer, the term of this ded or adjusted under 35 152391 patent is extended or adj U.S.C. 154(b) by 0 days. (21) Appl. No.: 13/590.423 (22) Filed: Aug. 21, 2012 Prior Publication Data US 2013/0315348 A1 Nov. 28, 2013 042726-ISA/EPO-Related U.S. Application Data (60) Provisional application No. 61/652,064, filed on May 25, 2012. rimary Examiner (74) Attorney, Age (51) Int. Cl. H04L 27/06 H04L 27/26 (2006.01) (2006.01) H03G 3/20 H03F 1/22 (2006.01) (2006.01) (2006.01) are disclosed. In an exc H03F 3/193 first and second amplifier stages, e.g., for a carrier aggrega-tion (CA) LNA or a multiple-input multiple-output (MIMO) LNA. The first amplifier stage receives and amplifies an input (Continued) (52) U.S. CL radio frequency (RF H04L 27/2647 (2013.01); H03F 1/223 signal to a first load enabled. The input R (2013.01); H03F 3/193 (2013.01); H03F 3/68 (2013.01); H03F 3/72 (2013.01); H03G 3/20 ultiple carriers (2013.01) The second amplifier (58) Field of Classification Search RF signal and provide CPC . H04L 27/2647; H04L 27/2649; H04L 27/38; load circuit when the amplifier stage may

9. The apparatus of claim 1, further comprising:
a first attenuation circuit coupled to the first amplifier stage and configured to receive the input RF signal; and
a second attenuation circuit coupled to the second amplifier stage and configured to receive the input RF signal.

 The apparatus of claim 1, further comprising: an attenuation circuit coupled to the first and second amplifier stages and configured to receive the input RF signal.

-00048 IPR, Ex. 1101 ('356 Patent) at Claim 9, 10 (annotated)



#### **Fay Declaration**

Section III.D.3, attenuation circuits were commonly used to provide impedance
matching and gain control, as well as suppression of interference signals and
prevention of signal clipping, before the Patent Owner's alleged conception date
DOCKET NO.: 0107131-00573US2 Filed on behalf of Intel Corporation
alternatives, such as variable gain LNAs. Id. The use of programmable
attenuation circuits allows the amplifier gain to be modified in response to
operational conditions (e.g., signal strength), while at the same time maintaining or
improving linearity (IIP3). Thus, as Youssef explains, an attenuator enables "a low
BEFORE THE PATENT TRIAL AND APPEAL BOARD
figure." Id. at 2001. A person of ordinary skill would have been motivated to
couple the attenuation circuit of Youssef to the first amplifier stage of the amplifier
of Jeon in view of Xiong in order to achieve such "low power, highly linear, wide
dynamic range" front-end realizations.

#### Youssef

ends. Fig. 1a shows a VG-LNA used to control the RF gain, while Fig. 1b shows a programmable passive attenuator used to control the RF gain. Both techniques are capable of preventing a receiver from clipping at large input signal levels and, in theory, either one can be used to boost the linearity of a mobile TV tuner. However, the difference between them

TV applications presents several challenges. Such an attenuator has to achieve certain characteristics so that it can protect the RF performance of a mobile TV receiver in the presence of interferer blockers as high as 0 dBm. Typically, it

SAW filters) usually used in traditional TV-can tuners to suppress far-away interferer blockers are thus not an option for

Ahmed Youssef and James Haslett

: integrated timers. This results in tightening the linearity

Edward Youssoufian

#### V. CONCLUSION

A novel RF attenuator linearization circuit has been proposed to overcome the shortcomings of having the VG-LNA alone control the mobile TV front-end gain. The attenuator designed in 65 nm CMOS technology enables a low power, highly linear, wide dynamic range front-end realization with low noise figure at sensitivity level. The attenuator design can be scaled to any application that requires a wide dynamic range RF front-end.

-00048 IPR, Ex. 1102 (Fay Decl.) at ¶¶ 117 (annotated); Ex. 1109 (Youssef) at 1999-2001 (annotated)

INTEL 1102

DOCKET NO.: 0107131-00573US2 Filed on behalf of Intel Corporation By: David L. Cavanaugh, Reg. No. 36,476 John V. Hobgood, Reg. No. 61,540 Benjamin S. Fernandez, Reg. No. 55,172 Gregory H. Lantier, pro hac vice Wilmer Cutler Pickering Hale and Dorr LLP 1875 Pennsylvania Ave., NW Washington, DC 20006 Tel: (202) 663-6000 David Cavanaugh@wilmerhale.com Email John Hobgood @wilmerhale.com Ben Fernandez@wilmerhale.com Gregory Lantier@wilmerhale.com UNITED STATES PATENT AND TRADE BEFORE THE PATENT TRIAL AND AP INTEL CORPORATION Petitioner 10 OUALCOMM INCORPORAT

Patent Owner Case IPR2019-00048 U.S. Patent No. 9,154,356

DECLARATION OF PATRICK FAY, PH.D. PETITIONER'S REPLY amplifier architecture in Jeon. Ex. 1105, 2660. A POSITA would have understood

processing the UHF and VHF carriers described in Youssef to be within the

"applications" that might "require the transceiver to operate in a wide range of RF

frequencies" supported by the amplifier architecture in Jeon, and would have

understood that receiving carriers at UHF and/or VHF frequencies using the

combination of Jeon, Xiong, and Youssef proposed in the Petition would not have

involved changing the capacitance values of C1, C2, or C3 of the attenuation

circuit of Youssef. Ex. 1102, ¶117-18.

Intel 1139 Intel v. Qualcomm IPR2019-00048

-00048 IPR, Ex. I 139 (Second Fay Decl.) at ¶ 51 (annotated)

DOCKET NO.: 0107131-00573US2 Filed on behalf of Intel Corporation By: David L. Cavanaugh, Reg. No. 36,476 John V. Hobgood, Reg. No. 61,540 Benjamin S. Fernandez, Reg. No. 55,172 Gregory H. Lantier, pro hac vice Wilmer Cutler Pickering Hale and Dorr LLP 1875 Pennsylvania Ave., NW Washington, DC 20006 Tel: (202) 663-6000 David Cavanaugh@wilmerhale.com John Hobgood @wilmerhale.com Ben Fernandez@wilmerhale.com Gregory Lantier@wilmerhale.com UNITED STATES PATENT AND TRADE BEFORE THE PATENT TRIAL AND AP INTEL CORPORATION Petitioner OUALCOMM INCORPORAT Patent Owner Case IPR2019-00048 U.S. Patent No. 9,154,356 DECLARATION OF PATRICK FAY, PH.D. PETITIONER'S REPLY

52. Second, tuning RF circuitry (e.g., by selecting capacitance values) is well within the capabilities of a person of ordinary skill in the art. As stated in the Petition and my initial declaration, the combination of Jeon and Xiong with Youssef "could have been implemented with *well-known circuit design and manufacturing techniques* and would have produced predictable results." Pet., 67-68; Ex. 1102, ¶118. In fact, Youssef first describes C1, C2, and C3, in functional/design terms. Ex. 1109, 2001 ("the capacitance values of these capacitors would set the lower frequency limit of the attenuator"). "To support the VHF band, 70 pF and 30 pF *capacitances were chosen* for the attenuator (C3) and the matching network caps (C1&C2) respectively." Id. The '356 patent also

-00048 IPR, Ex. I 139 (Second Fay Decl.) at ¶ 52 (annotated)

IPR2019-00048

3GPP TR 36.912 V9.1.0 (2009-12)

LTE-Advanced extends LTE Rel.-8 with support for Carrier Aggregation, where two or more component carriers (CCs) are aggregated in order to support wider transmission bandwidths up to 100MHz and for spectrum aggregation.

Carrier aggregation is supported for both contiguous and non-contiguous component carriers with each component carrier limited to a maximum of 110 Resource Blocks in the frequency domain using the LTE Rel-8 numerology

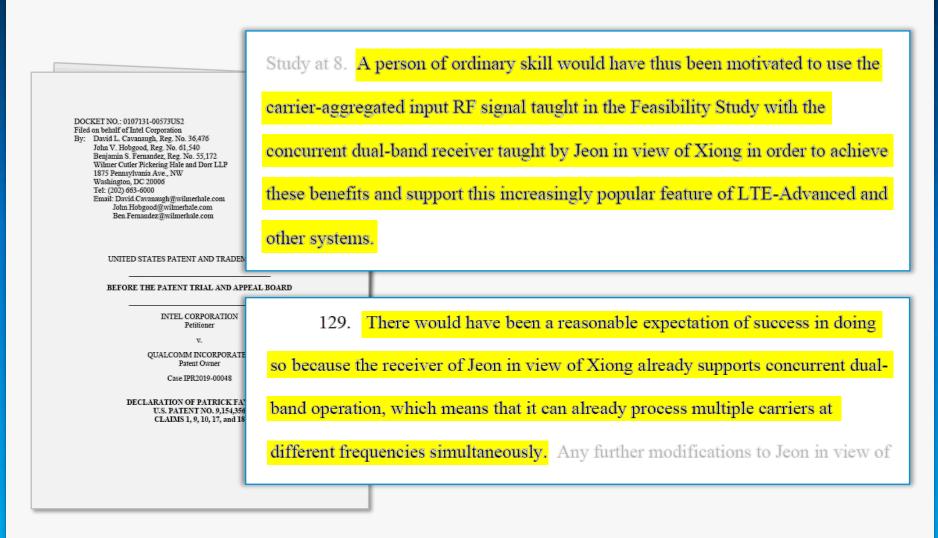
It is possible to configure a UE to aggregate a different number of component carriers originating from the same eNB and of possibly different bandwidths in the UL and the DL. In typical TDD deployments, the number of component

The present document has been developed within the <sup>144</sup> Generation Partnership Project (IGPP<sup>105</sup>) and may be further elaborated for the purposes of SGPP. The present document has not been subject to any approval present by the SGPPOrganizational Partners and shall not be implemented. This Specifications and reports for implementations of the SGPP<sup>105</sup> system Model be obtained in the SGPPOrganizational Partners and shall not be implemented. Specifications and reports for implementation of the SGPP<sup>105</sup> system Model be obtained in the SGPPOrganizational Partners Applications. Specifications and reports for implementation of the SGPP<sup>105</sup> system Model be obtained in the SGPPOrganizational Partners Applications. Specifications and reports for implementation of the SGPP<sup>105</sup> system Model be obtained in the SGPPOrganizational Partners Applications. Specifications and reports for implementation of the SGPP<sup>105</sup> system Model be obtained in the SGPPOrganizational Partners Applications.

-00048 IPR, Ex. I 104 (Feasibility Study) at 8-9 (annotated)

- "A person of ordinary skill in the art would have found it obvious to use the input RF signal employing carrier aggregation of the Feasibility Study with the concurrent multiband receiver and amplifier of Jeon in view of Xiong."
  - "[T]he Feasibility Study recognizes that wireless mobile devices can be configured to operate with input RF signals employing carrier aggregation."
  - "[The Feasibility Study] also recognizes that an ideal receiver for carrier aggregation would have multiple RF front-ends to allow for processing of far-apart carriers to support inter-band carrier aggregation and noncontiguous intra-band carrier aggregation."
  - "RF front end' refers to the components between the antenna and the baseband, including filters, amplifiers, and mixers."
  - "Jeon in view of Xiong teaches the use of such multiple front-ends because its wireless receiver uses multiple processing paths (each of which includes an amplifier and a mixer set) for different frequency bands."
  - "Therefore, the receiver in Jeon in view of Xiong has the 'multiple front ends' that the Feasibility Study recommends for carrier aggregation."

-00048 IPR, Ex. 1102 (Fay Decl.) at ¶ 127



-00048 IPR, Ex. 1102 (Fay Decl.) at ¶¶ 128, 129 (annotated)