

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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STMicroelectronics, Inc.,

*Petitioner*

v.

Ocean Semiconductor LLC,

*Patent Owner*

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Case IPR2022-00681

Patent No. 6,968,248

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**PATENT OWNER'S RELIMINARY RESPONSE**

Under 35 U.S.C. § 42.107

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Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450  
*Submitted Electronically via PTAB E2E*

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2001	February 9, 2022 Decision Granting Institution of Inter Partes Review

## I. INTRODUCTION

Through the undersigned Counsel, Patent Owner, Ocean Semiconductor, LLC (“Ocean” or “Patent Owner”) submits the following Patent Owner Preliminary Response pursuant to 37 C.F.R. § 42.107 (a). *See also* 37 C.F.R. § 42.107 (b).

Petitioner STMicroelectronics, Inc. (“STMicro” or “Petitioner”) filed a Petition for *Inter Partes* Review of U.S. Patent No. 6,968,248 (the “’248 patent”) on March 9, 2022. (IPR2022-00680, Paper No. 1 (“Petition”).) The Petition was filed with an accompanying Motion for Joinder (Paper No. 3 (“Motion for Joinder”)) requesting that this matter be joined with an already-pending matter, *Applied Materials, Inc. v. Ocean Semiconductor LLC*, IPR2021-01342 (P.T.A.B.) (the “AMAT IPR”). As discussed in more detail below, Ocean does not oppose the Motion for Joinder, provided that: (1) the Petition does not contain any arguments not already set forth in the AMAT IPR; and (2) if Applied Materials, Inc. (“AMAT”) withdraws its contentions in the co-pending AMAT IPR, STMicro must also withdraw each of its Grounds from this matter.

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