

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

STMICROELECTRONICS, INC.,

Petitioner,

v.

OCEAN SEMICONDUCTOR LLC,

Patent Owner.

---

Case No. IPR2022-00681

U.S. Patent No. 6,968,248

---

**MOTION FOR JOINDER TO *INTER PARTES* REVIEW IPR2021-01342**

## TABLE OF CONTENTS

	<b>Page</b>
I. STATEMENT OF PRECISE RELIEF REQUESTED .....	1
II. STATEMENT OF MATERIAL FACTS .....	2
III. STATEMENT OF REASONS FOR RELIEF REQUESTED .....	3
IV. CONCLUSION.....	6

## TABLE OF AUTHORITIES

CASES	PAGE(S)
<i>Garmin Int’l, Inc. v. Philips North Am. LLC</i> , IPR2020-00910, Paper 8 (PTAB Nov. 19, 2020).....	5
<i>HTC v. Parthenon Unified Memory Architecture LLC</i> , IPR2017-00512, Paper 12 (PTAB, June 1, 2017) .....	3, 5
<i>Kyocera Corp. v. Softview LLC</i> , IPR2013-00004, Paper 15 (PTAB Apr. 24, 2013) .....	4
<i>Mylan Pharms., Inc. v. Novartis AG</i> , IPR2014-00550, Paper 38 (PTAB Apr. 10, 2015) .....	5
<i>Samsung Elecs. Co. v. Raytheon Co.</i> , IPR2016-00962, Paper 12 (PTAB Aug. 24, 2016).....	4
<i>STMicroelectronics, Inc. v. Lone Star Silicon Innovations, LLC</i> , IPR2018-00436, Paper 7 (PTAB May 4, 2018) .....	5
<b>STATUTES</b>	
35 U.S.C. § 315(c) .....	3
<b>REGULATIONS</b>	
37 C.F.R. § 42.122(b) .....	3

## I. STATEMENT OF PRECISE RELIEF REQUESTED

Petitioner STMicroelectronics, Inc. (“Petitioner” or “ST”) moves for joinder of its contemporaneously-filed Petition for *Inter Partes* Review (“IPR”) of claims 1–22 of U.S. Patent No. 6,968,248 (“the ’248 patent”) with a pending IPR, *Applied Materials, Inc. v. Ocean Semiconductor LLC*, IPR2021-01342 (“the Applied Materials IPR” or “the Applied Materials proceeding”), which the Board instituted on February 9, 2022.

The Applied Materials IPR concerns the same patent and the same claims as ST’s Petition. The prior art-related portions of ST’s Petition and supporting expert declaration are substantively identical to those submitted in the Applied Materials IPR. Petitioner here asserts that the same claims are obvious over the same prior art based on the same arguments supported by the same expert as in the Applied Materials IPR.

Petitioner agrees to take an “understudy” role if joined. Joinder will not cause any delay in the resolution of the Applied Materials IPR. The Applied Materials IPR petitioner has no position on ST’s joinder request. Patent Owner does not oppose this motion. Joinder is appropriate because it will resolve the same patentability issues of the same patent, it will not delay the schedule that the Board has issued in the Applied Materials IPR, and the parties in the Applied Materials IPR will not be prejudiced.

## II. STATEMENT OF MATERIAL FACTS

1. Ocean Semiconductor LLC (“Patent Owner”) purports to own the ’248 patent.

2. Patent Owner has asserted the ’248 patent against Petitioner and others in several district court lawsuits: *Ocean Semiconductor LLC v. Analog Devices, Inc.*, No. 1:20-cv-12310 (D. Mass.), *Ocean Semiconductor LLC v. Infineon Techs. AG*, No. 1:20-cv-12311 (D. Mass.), *Ocean Semiconductor LLC v. Huawei Device USA, Inc.*, No. 4:20-cv-991 (E.D. Tex.), *Ocean Semiconductor LLC v. MediaTek Inc.*, No. 6:20-cv-1210 (W.D. Tex.), *Ocean Semiconductor LLC v. NVIDIA Corp.*, No. 6:20-cv-1211 (W.D. Tex.), *Ocean Semiconductor LLC v. NXP Semiconductors NV*, No. 6:20-cv-1212 (W.D. Tex.), *Ocean Semiconductor LLC v. Renesas Elec. Corp.*, No. 6:20-cv-1213 (W.D. Tex.), *Ocean Semiconductor LLC v. Silicon Laboratories Inc.*, No. 6:20-cv-1214 (W.D. Tex.), *Ocean Semiconductor LLC v. STMicroelectronics, Inc.*, No. 6:20-cv-1215 (W.D. Tex.), and *Ocean Semiconductor LLC v. Western Digital Techs., Inc.*, No. 6:20-cv-1216 (W.D. Tex.).

3. On August 3, 2021, Applied Materials filed the Applied Materials IPR, requesting cancellation of claims 1–22 of the ’248 patent. IPR2021-01342, Paper 1.

4. On February 9, 2022, the Board instituted the Applied Materials IPR

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.