

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY LIMITED,

Petitioner,

v.

ALIDDOUBLE, INC.

Patent Owner.

Case No. IPR2023-00373

U.S. Patent No. 9,431,455

PETITIONER'S NOTICE OF OBJECTIONS TO EVIDENCE

I. INTRODUCTION

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner Taiwan Semiconductor Manufacturing Company Limited (“Petitioner”), submits the following objections to Patent Owner Alidouble, Inc.’s (“Patent Owner”) Exhibit 2011, 2013, 2014, 2015, 2016. As required by 37 C.F.R. § 42.62, Petitioner’s objections below apply the Federal Rules of Evidence (“FRE”).

II. OBJECTIONS

A. Objections to Exhibit 2011 – Declaration of Ron Maltiel

Grounds for Objection: FRE 401-403

Petitioner objects to the admissibility of certain portions of Exhibit 2011 under FRE 401-403. Petitioner objects to Exhibit 2011 to the extent that is not cited by the Patent Owner’s Response, including but not limited to paragraphs 20-24, 27-45, 56-57, 100, 113, and 119-120. Because the Patent Owner’s Response does not rely on those portions of Exhibit 2011, they are not relevant to the instituted grounds of review. Further, to the extent the uncited portions of Exhibit 2011 are deemed relevant, their admission would be unduly prejudicial, misleading, and a waste of time in view of the fact that they are not cited in the Patent Owner’s Response.

B. Objections to Exhibit 2013 – Xiao, Chapter 10 - CVD and Dielectric Thin Film

Grounds for Objection: FRE 106, 801-803, 901

Petitioner objects to the admissibility of Exhibit 2013 under FRE 106, 801-803, and 901. Patent Owner has not established that Exhibit 2013 is an authentic copy. Petitioner objects to Exhibit 2013 as incomplete. Petitioner further objects to Exhibit 2013 as hearsay.

C. Objections to Exhibit 2014 – Stefanov, Design and Performance of a Pinned Photodiode CMOS Image sensor (2018)

Grounds for Objection: FRE 106, 801-803, 901

Petitioner objects to the admissibility of Exhibit 2014 under FRE 106, 801-803, and 901. Patent Owner has not established that Exhibit 2014 is an authentic copy. Petitioner objects to Exhibit 2014 as incomplete. Petitioner further objects to Exhibit 2014 as hearsay.

D. Objections to Exhibit 2015 – Plasma-Therm: PECVD and HDPCVD Basics (2015)

Grounds for Objection: FRE 106, 801-803, 901

Petitioner objects to the admissibility of Exhibit 2015 under FRE 106, 801-803, and 901. Patent Owner has not established that Exhibit 2015 is an authentic copy. Petitioner objects to Exhibit 2015 as incomplete. Petitioner further objects to Exhibit 2013 as hearsay.

E. Objections to Exhibit 2016 – Wolf & Tauber, Silicon Processing for the VLSI Era, Volume 1: Process Technology

Grounds for Objection: FRE 106, 801-803, 901

Petitioner objects to the admissibility of Exhibit 2016 under FRE 106, 801-803, and 901. Patent Owner has not established that Exhibit 2016 is an authentic copy. Petitioner objects to Exhibit 2016 as incomplete. Petitioner further objects to Exhibit 2016 as hearsay.

Date: October 18, 2023

By: /s/ James M. Glass

James M. Glass

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Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 18, 2023, true and correct copies of the foregoing document were served electronically on Patent Owner's counsel of record by email at the following addresses:

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Date: October 18, 2023

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