

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.
Petitioner

v.

DAEDALUS PRIME LLC
Patent Owner

Case IPR2023-00653
Patent No. 11,251,281

JOINT MOTION TO TERMINATE

UPDATED EXHIBIT LIST

SAMSUNG-1001	U.S. Patent No. 11,251,281 to Glass (“the ’281 Patent”)
SAMSUNG-1002	File History of the ’281 Patent
SAMSUNG-1003	Expert Declaration of Dr. Fred Schubert
SAMSUNG-1004	[RESERVED]
SAMSUNG-1005	Certified English Translation of Japanese Patent Application Publication No. 2010-171337 (“Tezuka”)
SAMSUNG-1006	U.S. Patent App. Pub. No. 2010/0276761 (“Tung”)
SAMSUNG-1007	U.S. Patent App. Pub. No. 2011/0073952 (“Kwok”)
SAMSUNG-1008	U.S. Patent App. Pub. No. 2010/0148217 (“Simonelli”)
SAMSUNG-1009	U.S. Patent App. Pub. No. 2012/0139015 (“Yu”)
SAMSUNG-1010	U.S. Patent App. Pub. No. 2009/0325607 (“Conway”)
SAMSUNG-1011	U.S. Patent App. Pub. No. 2011/0042748 (“Anderson”)
SAMSUNG-1012	Japanese Patent Application Publication No. 2010-171337 (Original Japanese version of Tezuka)
SAMSUNG-1013	Excerpts of the File History of EP Patent App. No. 19188924.5
SAMSUNG-1014	Complainant Daedalus Prime LLC’s Infringement Claim Chart for U.S. Patent No. 10,700,178 (Exhibit 47 to Complaint), In the Matter of Certain Semiconductor Devices, Mo-bile Devices Containing the Same, and Components Thereof (ITC Investigation No. 337-TA-1336)
SAMSUNG-1015	Complainant Daedalus Prime LLC’s Infringement Claim Chart for U.S. Patent No. 11,251,281 (Exhibit 48 to Complaint), In the Matter of Certain Semiconductor Devices, Mo-bile Devices Containing the Same, and Components Thereof (ITC Investigation No. 337-TA-1336)
SAMSUNG-1016	Findlay Shearer, Power Management in Mobile Devices - A

View of Energy Conservation - Part IV, EE Times, May 5, 2008, available at <https://www.eetimes.com/power-management-in-mobile-devices-a-view-of-energy-conservation-part-iv/>

SAMSUNG-1017	U.S. Patent App. Pub. No. 2011/0147842 (“Cappellani”)
SAMSUNG-1018	U.S. Patent No. 7,288,443 (“Zhu”)
SAMSUNG-1019	U.S. Patent No. 2007/0235802 (“Chong”)
SAMSUNG-1020	U.S. Patent App. Pub. No. 2005/0184316 (“Kim I”)
SAMSUNG-1021	U.S. Patent App. Pub. No. 2007/0082451 (“Samoilov”)
SAMSUNG-1022	A. Nishida et al., Elimination of Misfit Dislocations in Si _{1-x} Ge _x /Si Heterostructures by Limited-area Molecular-beam Epi-taxial Growth, J. Appl. Phys 71 at 5913-5917 (1992) (“Nishida”)
SAMSUNG-1023	E.A. Fitzgerald, The Effect of Substrate Growth Area on Mis-fit and Threading Dislocation Densities in Mismatched Heter-ostructures, J. Vac. Sci. Tech. B7 at 782-788 (1989) (“Fitz-gerald”)
SAMSUNG-1024	Arne Larsen, Epitaxial Growth of Ge and SiGe on Si Substrates, Materials Science in Semiconductor Processing 9 at 454-459 (2006) (“Larsen”)
SAMSUNG-1025	Schubert, Room Temperature Properties of Si, Ge, GaAs, and GaN (“Schubert Materials Datasheet”)
SAMSUNG-1026	Elsevier, Encyclopedia of Materials: Science and Technology at pp. 8479-8486 (2001) (“Elsevier”)
SAMSUNG-1027	Kim et al., Increased Critical Thickness for High Ge-Content Strained SiGe-on-Si Using Selective Epitaxial Growth, Amer-ican Institute of Physics, Applied Physics Letter 97, 262106 (2010) (“Kim II”)
SAMSUNG-1028	Semiconductor Doping Technology, available at https://www.iue.tuwien.ac.at/phd/wittmann/node7.html

SAMSUNG-1029	Natalie Stavitski, Silicide-to-Silicon Specific Contact Resistance Characterization: Test Structures and Models (2009) (“Stavitski”)
SAMSUNG-1030	EP Application No. 1 575 082 A2 (“Demeurisse”)
SAMSUNG-1031	U.S. Patent No. 5,296,386 (“Aronowitz”)
SAMSUNG-1032	U.S. Patent App. Pub. No. 2006/0286755 (“Brask”)
SAMSUNG-1033	U.S. Patent App. Pub. No. 2011/0024804 (“Chang”)
SAMSUNG-1034	Peter Hadley, Semiconductor Doping, Institute of Solid State Physics, available at https://lampx.tugraz.at/~hadley/psd/problems/doping/s.pdf
SAMSUNG-1035	Mirabella et al., Mechanisms of Boron Diffusion in Silicon and Germanium, Journal of Applied Physics 113, 031101 (2013) (“Mirabella”)
SAMSUNG-1036	U.S. Patent App. Pub. No. 2006/0071275 (“Brask”)
SAMSUNG-1037	Brown et al., Lattice stability and point defect energetics of TiSi ₂ and TiGe ₂ allotropes from first-principles calculations, Journal of Applied Physics 129, 085104 (2021) (“Brown”)
SAMSUNG-1038	U.S. Application Serial No. 13/990,224 (“the ’224 Application”)
SAMSUNG-1039	U.S. Patent App. Pub. No. 2009/0325350 (“Radosavljevic”)
SAMSUNG-1040	Peter Caputa, Efficient High-Speed On-Chip Global Interconnects, Linkopings Universitet Institute of Technology, Dissertation No. 992 (2006)
SAMSUNG-1041	Larry Zhao, All About Interconnects, Semiconductor Engineering, available at https://semiengineering.com/all-about-interconnects (retrieved Jan. 17, 2023)
SAMSUNG-1042	U.S. Patent App. Pub. No. 5,439,848 (“Hsu”)
SAMSUNG-1043	U.S. Patent App. Pub. No. 2010/0123198 (“Kim III”)

SAMSUNG-1044	U.S. Patent No. 7,692,254 (“Anderson”)
SAMSUNG-1045	U.S. Application Serial No. 12/975,278 (“the ’278 Application”)
SAMSUNG-1046-1054	[RESERVED]
SAMSUNG-1055	Settlement Agreement
SAMSUNG-1056-1100	[RESERVED]
SAMSUNG-1101	Daedalus Prime LLC’s Complaint In the Matter of Certain Semiconductor Devices, Mobile Devices Containing the Same, and Components Thereof (ITC Investigation No. 337-TA-1336)
SAMSUNG-1102	Complaint, Daedalus Prime LLC v. Samsung Electronics Co. Ltd. et al., Civil Action No. 2:22-cv-352 (E.D. Tex.) (September 12, 2022)
SAMSUNG-1103	Order Granting Stay, Daedalus Prime LLC v. Samsung Electronics Co. Ltd. et al., Civil Action No. 2:22-cv-352 (E.D. Tex.) (November 1, 2022)
SAMSUNG-1104	Director Katherine K. Vidal’s Memorandum re Interim Procedure for Discretionary Denials in AIA Post-Grant Proceedings With Parallel District Court Litigation (June 21, 2022)

The Parties in this case have reached a settlement that addresses this proceeding. The Parties therefore contacted the Board on June 1, 2023, to inform the Board of the settlement and request instructions regarding termination of this proceeding. In accordance with the Board's email instructions received on June 2, 2023, the Parties hereby jointly submit this motion to terminate. The Parties respectfully request that the Board terminate IPR2023-00653 with prejudice.

Pursuant to 35 U.S.C. § 317(b), 37 C.F.R. § 42.74, and the Board's e-mail, the Parties have concurrently filed the Settlement Agreement as Exhibit 1055. The Parties state that there are no other agreements, oral or written, between the Parties made in connection with, or in contemplation of, the termination of the proceeding. The Parties have concurrently filed a joint request to treat the Settlement Agreement as confidential business information pursuant to 37 C.F.R. § 42.74(c), consistent with the provisions of the Agreement.

Respectfully submitted,

Dated June 13, 2023

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CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e), the undersigned certifies that on June 13, 2023, a complete and entire copy of this Joint Motion to Terminate and Exhibit 1055 were provided by email, to the Patent Owner, by serving the correspondence addresses of record as follows:

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