

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ADVANCED MICRO DEVICES, INC.,
Petitioner,

v.

REALTEK SEMICONDUCTOR CORPORATION,
Patent Owner.

IPR2023-00788
U.S. PATENT NO. 9,590,582

JOINT AGREEMENT TO TREAT SETTLEMENT AGREEMENT AS
BUSINESS CONFIDENTIAL INFORMATION

PETITIONER'S UPDATED EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 9,590,582
1002	File History of U.S. Patent No. 9,590,582
1003	Declaration of Dr. Paul Prucnal
1004	Curriculum Vitae of Dr. Paul Prucnal
1005	J. Gonzalez et al., <i>A 56-GHz LC-Tank VCO With 17% Tuning Range in 65-nm Bulk CMOS for Wireless HDMI</i> , IEEE Transactions on Microwave Theory and Techniques, Vol. 58, Issue 5 (May 2010), available at https://ieeexplore.ieee.org/document/5438827
1006	Matthew Muh, Master of Science thesis entitled <i>Design of a FinFET static frequency divider and a millimeter-wave CMOS push-push VCO</i> , Department of Electrical Engineering and Computer Sciences at the University of California at Berkeley (2005), available at https://citeseerx.ist.psu.edu/document?repid=rep1&type=pdf&doi=7337593a3bdb909b1f7d53da1c3202a61401fac7
1007	A. Niknejad et al., <i>mm-Wave Silicon Technology 60 GHz and Beyond</i> (Springer Science + Business Media 2008) (excerpts)

Exhibit No.	Description
1008	S. Biswal, <i>Basic Electronics Volume I</i> (Atlantic Publishers 2001) (excerpts)
1009	A. Niknejad & R. Meyer, <i>Design, Simulation and Applications of Inductors and Transformers for Si RF ICs</i> (Springer Science+Business Media 2000) (excerpts)
1010	A. Niknejad, <i>Electromagnetics for High-Speed Analog and Digital Communication Circuits</i> (Cambridge Univ. Press 2007) (excerpts)
1011	Joachim N. Burghartz, <i>Spiral Inductors on Silicon – Status and Trends (Invited Article)</i> , International Journal of RF and Microwave Computer-Aided Engineering, V. 8, No. 6, 422-432 (Nov. 1998), available at https://onlinelibrary.wiley.com/doi/abs/10.1002/%28SICI%291099-047X%28199811%298%3A6%3C422%3A%3AAID-MMCE3%3E3.0.CO%3B2-K
1012	O.H. Murphy et al., <i>Design of Multiple-Metal Stacked Inductors Incorporating an Extended Physical Model</i> , IEEE Transactions on Microwave Theory and Techniques, Vol. 53, No. 6, 2063-2072 (June 2005), available at https://ieeexplore.ieee.org/document/1440724

Exhibit No.	Description
1013	U.S. Patent No. 6,885,275 filed on Jan. 28, 2000, titled “Multi-track Integrated Spiral Inductor” to James Chang (“Chang”)
1014	U.S. Patent Application Pub. No. US 2008/0074229 published on Mar. 27, 2008 by Shahriar Moinian et al. (“Moinian”)
1015	Bryant Derand Williamson, Masters Thesis entitled <i>A 2.4 GHz LC-VCO Using On-Chip Inductors and Accumulation- Mode Varactors in a CMOS 0.18 μm Process</i>, University of Tennessee – Knoxville, Aug. 2005, available at https://trace.tennessee.edu/utk_gradthes/2537/ Axel Dominique Berny, PhD Dissertation entitled <i>Analysis and Design of Wideband LC VCOs</i>, Electrical Engineering and Computer Sciences, University Of California, Berkeley, Spring 2006, available at https://www2.eecs.berkeley.edu/Pubs/TechRpts/2006/EECS-2006-50.pdf
1016	Axel Dominique Berny, PhD Dissertation entitled <i>Analysis and Design of Wideband LC VCOs</i>, Electrical Engineering and Computer Sciences, University Of California, Berkeley, Spring 2006, available at https://www2.eecs.berkeley.edu/Pubs/TechRpts/2006/EECS-2006-50.pdf

Exhibit No.	Description
1017	A. Kral et al., <i>RF-CMOS Oscillators with Switched Tuning</i> , IEEE Custom Integrated Circuits Conference, May 14, 1998 available at https://ieeexplore.ieee.org/document/695039
1018	Fei Yuan, <i>CMOS Active Inductors and Transformers Principle, Implementation, and Applications</i> , (Springer Science+Business Media, LLC 2008) ISBN 978-0-387-76477-1, available at https://link.springer.com/book/10.1007/978-0-387-76479-5
1019	Thomas H. Lee et al., <i>RF Passive IC Components</i> in book entitled <i>Circuits and Filters Handbook</i> , 2d Ed. (CRC Press LLC 2003), available at http://www.kelm.ftn.uns.ac.rs/literatura/ekui/Circuits_and_Filters_Handbook_CH10.pdf
1020	Agilent Technologies, <i>Overview on interdigital capacitor design</i> , 2001, available at https://www.keysight.com/us/en/assets/7018-08093/technical-overviews-archived/5989-8912.pdf
1021	Sang Wook Park, PhD Dissertation entitled <i>Oscillator Architectures And Enhanced Frequency Synthesizer</i> , Texas A&M University (Dec. 2009) (“Park”), available at https://core.ac.uk/download/pdf/13643134.pdf

Exhibit No.	Description
1022	Changhua Cao et al., <i>Millimeter-Wave Voltage-Controlled Oscillators in 0.13-um CMOS Technology</i> , IEEE Journal of Solid-State Circuits, Vol. 41, Issue 6 (June 2006) (“Cao”), available at https://ieeexplore.ieee.org/document/1637594
1023	Yue Wu et al., <i>A Temperature Stabilized CMOS VCO for Zero-IF Cellular CDMA Receivers</i> , Digest of Technical Papers, 2005 Symposium on VLSI Circuits, June 16-18, 2005 (“Wu”), available at https://ieeexplore.ieee.org/document/1469413
1024	Dorra Mellouli et al., <i>Design and Implementation of A 6-GHz Array of Four Differential VCOs Coupled Through a Resistive Network</i> , Analog Integrated Circuits and Signal Processing, Vol. 76, pp. 179-193 (2013) (“Mellouli”), available at https://link.springer.com/article/10.1007/s10470-013-0099-6#citeas
1025	Xiao Shimao et al., <i>A novel 2.95–3.65 GHz CMOS LC-VCO using tuning curve compensation</i> , Journal of Semiconductors, Vol. 30, No. 10, 105001 (Oct. 2009) (“Xiao”), available at https://iopscience.iop.org/article/10.1088/1674-4926/30/10/105001/pdf

Exhibit No.	Description
1026	Mohammad Nariman et al., <i>A Switched-Capacitor mm-Wave VCO in 65 nm Digital CMOS</i>, 2010 IEEE Radio Frequency Integrated Circuits Symposium, May 23-25, 2010, pp. 157-160 (“Nariman”), available at https://ieeexplore.ieee.org/document/5477323
1027	Neric H. W. Fong, PhD Dissertation entitled <i>Low-Voltage Radio-Frequency CMOS Integrated Circuits in Silicon-On-Insulator</i>, Department of Electronics, Carleton University, Ottawa, Canada (May 23, 2002) (“Fong”), available at https://curve.carleton.ca/system/files/etd/63d93fb2-a8cc-4f63-865e-fba751da4fa1/etd_pdf/02a5d5d8788c5ea3b03555a6557ea59c/fong-lowvoltagefrequencycmosintegratedcircuits.pdf
1028	Babak Soltanian et al., <i>An Ultra Compact Differentially Tuned 6 GHz CMOS LC VCO with Dynamic Common-Mode Feedback</i>, IEEE 2006 Custom Integrated Circuits Conference, Sept. 10-13, 2006 (“Soltanian”), available at https://ieeexplore.ieee.org/document/4115046

Exhibit No.	Description
1029	V. Macaitis et al., <i>Design of a 4.48-5.89 GHz LC-VCO in nm RF CMOS Technology</i> , Elektronika IR Elektrotechnika, Vol. 20, No. 2, 44-47 (Feb. 5, 2014) (“Macaitis”), available at https://eejournal.ktu.lt/index.php/elt/article/view/6383
1030	Judith Maget, <i>Varactors and Inductors for Integrated RF Circuits in Standard MOS Technologies</i> , Institute of Electronics at the University of Bundeswehr (2002) (“Maget”), available at http://athene-forschung.unibw.de/doc/85282/85282.pdf .
1031	Paolo Lucchi, PhD Dissertation entitled <i>Frequency generation for mm-Wave and satellite applications</i> , University of Bordeaux (Feb. 2012) (“Lucchi”), available at https://www.theses.fr/2012BOR14479.pdf
1032	U.S. Patent Publication No. 2009/0322447 (“Daley”)
1033	U.S. Patent No. 9,270,247 (“Jing”)
1034	Realtek Infringement Chart for U.S. Patent No. 9,950,582
1035	Printout from www.m-w.com (Merriam-Webster Online Dictionary) (“substantial”)
1036	Declaration of Sylvia D. Hall-Ellis, Ph.D.

Exhibit No.	Description
1037	Curriculum Vitae of Sylvia D. Hall-Ellis, Ph.D
1038	Website Printout Regarding Gonzalez (EX-1005) accessed at: https://ieeexplore.ieee.org/abstract/document/5135585/figures#figures
1039	Website Printout Regarding IEEE Transactions on Microwave Theory and Techniques, accessed at: https://ieeexplore.ieee.org/abstract/document/5135585/figures#figures
1040	Order Denying Realtek’s Motion for Summary Determination (Public Version), <i>Certain Integrated Circuits, Components Thereof, and Products Containing the Same</i> , Inv. No. 337-TA-1350 (Sept. 7, 2023)
1041	Declaration of Joseph C. Masullo in support of <i>Pro Hac Vice</i> Admission
1042	Declaration of Robert T. Vlasik III in support of <i>Pro Hac Vice</i> Admission
1043	Supplemental Declaration of Sylvia D. Hall-Ellis, Ph.D.
1044	B. Raj et al., <i>Analytical Modeling of Nanoscale Double Gate FinFET Device</i> , Journal on Intelligent Electronic Systems, Vol. 1, No. 1 (Nov. 2007)

Exhibit No.	Description
1045	F. Nesamani et al., <i>Performance Improvement of FinFET using Nitride Spacer</i> , International Journal of Engineering Trends and Technology, Vol. 4, Issue 3 (2013)
1046	C. Nilges, <i>The Online Computer Library Center's Open WorldCat Program</i> , Library Trends, Vol. 54, No. 3 (Winter 2006)
1047	April 2, 2024 Affidavit from Internet Archive Records Request Processor Nathaniel E. Frank-White
1048	Initial Determination on Violation of Section 337 and Recommended Determination on Remedy and Bond, <i>Certain Integrated Circuits, Components Thereof, and Products Containing the Same</i> , Inv. No. 337-TA-1350 (Jan. 19, 2024) (public version)
1049	Portions of Transcript from October 16-20, 2023, Trial in <i>Certain Integrated Circuits, Components Thereof, and Products Containing the Same</i> , Inv. No. 337-TA-1350 (portions from public hearing)
1050	Supplemental Declaration of Dr. Paul Prucnal
1051	Transcript of April 19, 2024 Deposition of Dr. Joshua Phinney
1052 NEW	Confidential Settlement Agreement Between Parties [FILED UNDER SEAL]

Pursuant to 35 U.S.C. § 317 and 37 C.F.R. § 42.74, and the authorization provided in the Board's email of June 20, 2024, Petitioner Advanced Micro Devices, Inc. and Patent Owner Realtek Semiconductor Corporation, by and through their respective counsel of record, have reached a settlement and jointly move to terminate the above-captioned proceeding. As permitted by statute, Petitioner and Patent Owner request that the Board treat as business confidential information, the true and complete copy of the settlement agreement (Confidential Exhibit 1052) between the parties, as referenced in the parties' Joint Motion to Terminate Proceeding, filed concurrently herewith.

35 U.S.C. § 317(b) provides in relevant part that:

[a]t the request of a party to the proceeding, the agreement or understanding shall be treated as business confidential information, shall be kept separate from the file of the involved patents, and shall be made available only to Federal Government agencies on written request, or to any person on a showing of good cause.

Similarly, 37 C.F.R. § 42.74(c) provides that:

A party to a settlement may request that the settlement be treated as business confidential information and be kept separate from the files of an involved patent or application. The request must be filed with

the settlement. If a timely request is filed, the settlement shall only be available:

- (1) To a Government agency on written request to the Board; or
- (2) To any other person upon written request to the Board to make the settlement agreement available, along with the fee specified in § 42.15(d) and on a showing of good cause.

The present request, which is being filed contemporaneously with the settlement agreements, is timely and complies with the foregoing authority. The parties therefore respectfully request that the settlement agreement (Confidential Exhibit 1052: (i) be treated as business confidential information, (ii) be maintained separate from the publicly available file of the involved patent, and (iii) be made available only to Federal Government agencies on written request, or to persons showing good cause on written request, pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c).

Further, Petitioner and Patent Owner each request that they be notified if the Board receives and/or considers a request for access to the settlement agreement and be offered an opportunity to respond to any such request. *See Arista Networks, Inc. v. Castlemorton Wireless, LLC*, IPR2020-00986, Paper 7 (PTAB Oct. 28, 2020).

Date: June 21, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2024, I caused a true and correct copy of the foregoing to be served on the following counsel for Patent Owner by electronic mail to the following email addresses:

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