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Subject: IPR2023-01242, -01243, -01244
Date: Tuesday, December 10, 2024 5:32:29 PM
Attachments: [image726996.png](#)
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IPR2023-01242, -01243, -01244

Dear Board,

At the November 13, 2024 hearing in the above-captioned IPRs, the panel inquired about evidence about the direction of electrons. *See, e.g.*, IPR2023-01242, Paper 83 (hearing transcript) at 45:23-24, 47:24-48:2, 48:12-14, 48:21-25. Patent Owner writes to respectfully alert the Board to the following portions of Petitioner's exhibits, which are additional pieces of evidence responsive to the panel's inquiry:

- IPR2023-01242, Ex. 1037 (Howe textbook) at 18 (internally paginated as page 36) (equations 2.33 and 2.34 and associated text), 19 (internally paginated as 37) (equation 2.35 and associated text), 21 (internally paginated as 39) (Figure 2.11 showing how holes "drift...from left to right" and electrons move in opposite direction; also, "For electrons, the drift velocity is opposite to the electric field as shown in Fig. 2.11(b).")
- IPR2023-01242, Ex. 1038 (Hodges textbook) at last paragraph of 68 (internally paginated as 47)

Patent Owner respectfully requests that this email be made part of the record in these IPRs. Patent Owner conferred with Petitioner, which provided the following statement.

Petitioner's Position:

The Board did not ask for Patent Owner to submit additional arguments after the hearing, and Petitioner therefore asks the Board to disregard this inappropriate email briefing. At the hearing, the Board asked counsel for Patent Owner to identify their "best evidence" that electrons in *Kawagoe* would not move in the direction indicated on Petitioner's Slide 38, and counsel for Patent Owner responded that the best evidence came from the deposition testimony of its expert Dr. Glew (Ex. 1052). Transcript, 48:21-49:13. Patent Owner now seeks to change its representation to the Board at the hearing. Instead of relying on its own expert, Patent Owner is now attempting to identify other exhibits (Ex. 1037 and Ex. 1038) that Patent Owner never cited in its Patent Owner Response or its Sur-Reply. This is a new untimely argument. Moreover, Exhibits 1037 and 1038 do not contradict the plain statement in *Kawagoe* itself that electrons are attracted to the substrate body by the graded dopant concentration in that prior art reference. Ex. 1007 at 16:2-11.

IPR2023-01242, -01243, 01244
Ex. 3008

Respectfully,
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