

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LAM RESEARCH CORP.,

Petitioner,

v.

INPRIA CORP.,

Patent Owner.

Case No. IPR2024-00033

Patent No. 9,823,564

PETITIONER’S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. §42.70 and the Board’s Scheduling Order, dated April 24, 2024 (Paper 14), Petitioner Lam Research Corp. (“Petitioner”) respectfully requests oral argument in connection with this proceeding (IPR2024-00033). Per the Scheduling Order, the oral argument will take place on January 22, 2025.

Petitioner requests that the hearing take place live in the USPTO’s Alexandria, Virginia location.

Petitioner requests ninety (90) minutes in which to present its arguments for the IPR proceeding, in order to address arguments with respect to the original claims as well as the proposed substitute claims introduced through Patent Owner’s Motion to Amend.

To comply with 37 C.F.R. § 42.70(a)’s requirement that this request “must specify the issues to be argued,” and without waiving argument on any issue not specifically identified below, Petitioner specifies at least the following issues to be argued:

- That per 35 U.S.C. § 102, claims 1-12 are anticipated by U.S. Patent Application Publication No. 2011/0293888 (“888 publication”);
- That per 35 U.S.C. § 102, claims 1-5, 7-10, and 12 are anticipated by Stowers, Jason K. *Direct patterning of solution deposited metal oxides*. Oregon State University, 2008 (“Stowers 2008”);

- That per 35 U.S.C. § 103, claims 1-10, and 12 are obvious over Stowers 2008;
- That per 35 U.S.C. § 103, claim 8 is obvious over Stowers 2008 and Stowers, Jason, and Douglas A. Keszler. *High resolution, high sensitivity inorganic resists*. Microelectronic Engineering 86.4-6 (2009): 730-733 (Stowers 2009);
- That per 35 U.S.C. §§ 102-103, claims 1, 3, 6-7, 9, and 11-12 are anticipated and/or rendered obvious by Trikeriotis et al. *Development of an inorganic photoresist for DUV, EUV, and electron beam imaging*. Advances in Resist Materials and Processing Technology XXVII. Vol. 7639. SPIE, 2010 (“Trikeriotis”);
- That the proposed amended claims fail to meet the requirements under 37 C.F.R. § 42.121 or 35 U.S.C. § 316(d);
- That the proposed substitute claims are unpatentable for failing to meet the requirements of 35 U.S.C. § 112;
- That the proposed substitute claims are unpatentable in view of the prior art, including Stowers 2008 and Trikeriotis;
- That per 35 U.S.C. §§ 102-103, the proposed amended claims 13-23 are anticipated or otherwise rendered obvious by International Application Publication No. WO2008/082448 to Keszler et al. (“Keszler”);

- Rebuttal to issues raised by Patent Owner, including any issue addressed in Patent Owner's papers, including, but not limited to, Patent Owner's Response, Patent Owner's Contingent Motion to Amend, Patent Owner's Sur-Reply, and Patent Owner's Reply to Petitioner's Opposition to the Motion to Amend;
- Any other motions filed by either party; and
- Any other issues that the Board deems necessary for issuing a final written decision in this proceeding.

Respectfully submitted,

Dated: December 11, 2024

/ Dion M. Bregman /
Dion M. Bregman, Reg. No. 45,645

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e)(4), it is hereby certified that on December 11, 2024 an electronic copy of this **PETITIONER’S REQUEST FOR ORAL ARGUMENT** was served via email to Patent Owner’s counsel of record in this proceeding:

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Dated: December 11, 2024

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