UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MONOLITHIC POWER SYSTEMS, INC.,

Petitioner,

v.

GREENTHREAD, LLC,

Patent Owner.

Case No: IPR2024-00468

U.S. Patent No. 8,421,195

PETITIONER'S MOTION TO STRIKE PORTIONS OF PATENT OWNER'S SUR-REPLY

I. INTRODUCTION

Petitioner brings this motion to strike certain improper arguments in Patent Owner's Sur-Reply (Paper 47) because they do not respond to arguments in Petitioner's Reply. The Board granted authorization for this motion in an April 9, 2025 email to the Parties.

II. PATENT OWNER'S IMPROPER ARGUMENTS

A. SUR-REPLY AT PGS. 13-15: ONODA FIG. 11

On pages 13-15 of the Patent Owner Sur-Reply, Patent Owner presents new argument and evidence supporting the argument (*e.g.*, EX1055, 91:22-92:4, 94:7-13, 178:1-18)—for claim limitations Patent Owner did not argue against in its Response—that Onoda's Figure 11 does not disclose the claimed graded concentration of dopants because the dopant concentration remains flat throughout the claimed surface layer.

B. SUR-REPLY AT PGS. 17-23: MINORITY CARRIER

On pages 17-23 of the Patent Owner Sur-Reply, Patent Owner presents new argument and evidence supporting the argument (*e.g.*, EX2057, ¶ 36 n.3, EX1055, 38:10-39:5, 69:20-70:6, 125:4-10, 126:15-18, 130:4-7, 133:17-18, 136:10-14, 138:25-139:3, 139:7-9, 149:4-17, 152:23-153:2, 154:25-155:12, 157:7-11, 158:13-18, 159:6-21, 176:17-22, 183:13-16, 188:8-14, EX2085, 80:12-81:4, 95:11-17, 98:16-99:5, 109:12-19, 128:7-12, 129:10-18, 160:2-19)—for claim limitations

Patent Owner did not argue against in its Response—that Petitioner failed to identify the claimed "minority carrier" in the prior art references under the interpretation that a minority carrier in the identified layer can only be a hole (as opposed to an electron).

III. CONCLUSION

For the reasons set forth above, Petitioner asks the Board to strike the arguments set forth above.

Dated: April 16, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2025, a true and correct copy of the foregoing **PETITIONER'S MOTION TO STRIKE PORTIONS OF PATENT OWNER'S SUR-REPLY** was served by electronic mail on the Patent Owner via its attorneys of record:

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Respectfully submitted,

Date: April 16, 2025

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