UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MONOLITHIC POWER SYSTEMS, INC.,
Petitioner,

v.

GREENTHREAD, LLC,
Patent Owner.

IPR2024-00469
U.S. Patent No. 9,190,502

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

I. INTRODUCTION

Pursuant to the Board's April 9, 2025 email, Patent Owner submits this Opposition to Petitioner's Motion to Strike (Paper 52) Portions of Patent Owner's Sur-Reply (Paper 47). Patent Owner believes that this Motion is unwarranted and should be denied, as the alleged new arguments were properly presented in the Patent Owner's earlier papers and are responsive to arguments presented in Petitioner's Reply (Paper 42).

II. ARGUMENT

A. Onoda's Gradient

Patent Owner properly presented argument regarding Onoda's "graded concentration" and its effect (or lack thereof) on minority carriers in its PO Response (Paper 35 at 1 (acknowledging only "a concentration that Petitioner *says* is graded"), 3 (quoting Dr. Campbell's admission that only a "properly constructed" electric field will aid minority carrier movement), 9 (same), 17 (same), and 28 (explaining how Onoda only shows a downward gradient and no other information)) and PO Preliminary Response (Paper 10 at 13 (criticizing Dr. Campbell's reliance on the mere "shape" of Onoda's concentration profile)).

B. Minority Carrier

Patent Owner (a) properly presented argument regarding Petitioner's mapping to the wrong "charge carrier" in Kawagoe's and Onoda's NMOS transistors in its PO Response (Paper 35 at 5-6 (explaining how the transistor's channel is defined by the "charge carrier" and citing Dr. Glew's declaration (Ex. 2057 ¶ 36 n. 3) explaining that in an n-channel MOSFET, minority carriers are holes), 17-19 (Onoda), 22-25 (Kawagoe)) *and* (b) this portion of the PO Sur-reply is responsive to new arguments and "evidence" offered in Petitioner's Reply (Paper 42 at 23-24) that attack Dr. Glew's reliance on the claim specification in his deposition testimony and instead offer an interpretation (citing new exhibits) at odds with how the term is used in the patent.

III. CONCLUSION

For at least the foregoing reasons, the Board should deny Petitioner's motion to strike in its entirety.

Dated: April 23, 2025

Respectfully submitted,

/Alan Whitehurst/

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that a copy of this **PATENT OWNER'S OPPOSITION TO PETITIONER'S MOTION TO STRIKE PORTIONS OF PATENT OWNER'S SUR-REPLY** has been served on Petitioner via email on the following counsel of record for Petitioner:

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Dated: April 23, 2025

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