

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Samsung Electronics Co., Ltd.,
Petitioner,

v.

SiOnyx, LLC,
Patent Owner.

Case No. IPR2024-01430
Patent No. 11,069,737

**PETITIONER'S RESPONSE TO PATENT OWNER'S SUPPLEMENTAL
SUBMISSION ON DISCRETIONARY DENIAL**

List of Exhibits

Exhibit	Description
1001	U.S. Patent No. 11,069,737 (the “’737 patent”)
1002	File History for U.S. Patent No. 11,069,737
1003	Provisional Application No. 61/841,326
1004	Declaration of Dr. Michael Lebby
1005	Curriculum Vitae of Dr. Michael Lebby
1006	U.S. Patent Application Publication No. 2012/0068289 (Alie)
1007	U.S. Patent Application Publication No. 2006/0081900 (Baggenstoss)
1008	International Publication No. WO 2012/122572 (Jiang)
1009	U.S. Patent Application Publication No. 2012/0313204 (Haddad204)
1010	U.S. Patent Application Publication No. 2010/0006969 (Park)
1011	U.S. Patent No. 7,928,389 (Yap)
1012	U.S. Patent Application Publication No. 2011/0227138 (Haddad138)
1013	Samsung’s Proposed Constructions, Inv. No. 337-TA-1403 (Aug. 27, 2024)
1014	SiOnyx’s Proposed Constructions, Inv. No. 337-TA-1403 (Aug. 27, 2024)
1015	Email from N. Subhedar re: Claim Construction M&C Follow-Up (Sept. 8, 2024)
1016	U.S. Patent No. 8,680,591 (Haddad138 Issued Patent)
1017	U.S. Patent No. 9,496,308 (Haddad204 Issued Patent)
1018	The Authoritative Dictionary of IEEE Standard Terms (7th ed. 2000)
1019	Stephen Y. Chou et al., Nanoimprint Lithography, J. Vac. Sci. Technol. B 14(6), 4129-33 (1996)
1020	Gary S. May & Simon M. Sze, Fundamentals of Semiconductor Fabrication (2003)
1021	Provisional Application No. 61/311,004 (Haddad138-Provisional004)
1022	Provisional Application No. 61/243,434 (Haddad138-Provisional434)
1023	Provisional Application No. 61/311,107 (Haddad138-Provisional107)
1024	U.S. Patent Application Publication No. 2012/0146172 (Carey)
1025	U.S. Patent No. 7,442,629 (Mazur)
1026	U. Gösele & Q.-Y. Tong, Semiconductor Wafer Bonding (1998)
1027	U.S. Patent Application Publication No. 2011/0304003 (Tanida)
1028	S. Wolf, Microchip Manufacturing (2004)
1029	Encyclopedia of Physical Science and Technology (3rd ed. 2002)

1030	Christoph Posch, Detectors, Pixels, and Signal Processing, in Smart Cameras (Ahmed Nabil Belbachir ed., 2010)
1031	Order No. 36: Construing Certain Claim Terms in parallel matter of In re Certain Sensors with Pixels and Products Containing the Same, Inv. No. 337-TA-1403 (U.S.I.T.C.)
1032	March 20, 2025 Email from S. Weidenfeller re: IPR2024-01430 and - 01431: Motions to terminate/withdraw ground

Petitioner is agreeing to narrow its challenges to U.S. Patent No. 11,069,737 before the Board by moving to terminate this IPR petition. *See* Ex.1032.

Date: March 20, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, I hereby certify that the foregoing Petitioner's Response to Patent Owner's Supplemental Submission on Discretionary Denial, together with Exhibit 1032, was served by electronic mail on the following counsel of record for patent owner:

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Date: March 20, 2025

/Scott C. Weidenfeller/
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