

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INNOSCIENCE AMERICA, INC.,
Petitioner,

v.

INFINEON TECHNOLOGIES AMERICAS CORP.,
Patent Owner.

Case No. IPR2025-00175
Patent No. 8,686,562

**PATENT OWNER'S AUTHORIZED RESPONSE TO
PETITIONER'S REQUEST FOR DIRECTOR REVIEW**

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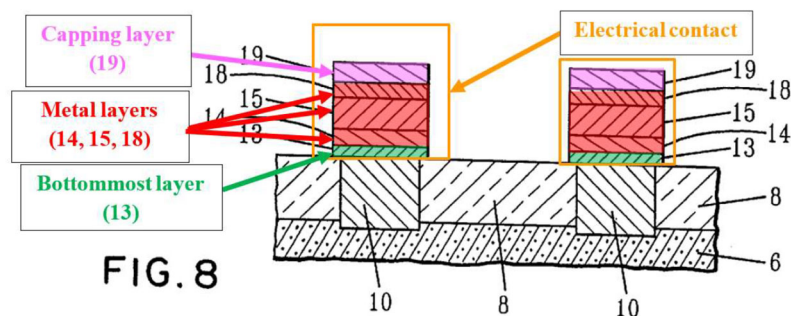
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The Director should reject Petitioner’s request to vacate the Final Written Decision (“FWD”) because the Board correctly found that Petitioner failed to prove any claim unpatentable. The Board did not adopt a new construction and deprive Petitioner of a chance to address it. The Board adopted a simplified version of Petitioner’s construction and correctly found that *Petitioner failed to show that its prior art met requirements of Petitioner’s own construction.*

I. PETITIONER FAILED TO SHOW THAT ITS PRIOR ART MET REQUIREMENTS OF PETITIONER’S OWN CONSTRUCTION

The parties disputed the meaning of “electrode stack” in connection with Grounds 1-4 (“Usui-based Grounds”). The Petition alleged Usui’s “interconnect metallurgy structure” – layers 13-15 and 18-19 in Usui’s Fig. 8 (reproduced with the Petitioner’s annotations below) – meets the claimed “electrode stack” under the term’s “plain meaning.” Petition, 7, 11-12. The Board ordered the parties “to take specific positions” on the construction of “electrode stack.” Paper 10 at 14.



A. Petitioner’s Construction Included the Requirements the Board Adopted that an Electrode is a Conductor that Provides the Path for Current Entering/Leaving a Medium Like a Semiconductor

Patent Owner (“Infineon”) explained that “[t]he Board need not reach an

outer boundary construction for ‘electrode stack’ to reject” the Petition’s grounds. Paper 17 (“POR”) at 8 (*citing Nidec Motor v. Zhongshan Broad Ocean Motor*, 868 F.3d 1013, 1017 (Fed. Cir. 2017) (the Board need only construe terms to the extent necessary to resolve the parties’ dispute). Infineon also offered an outer boundary construction. POR, 3-10. Petitioner criticized Infineon’s construction as too narrow. Paper 18 (“Reply”) at 2-8. Petitioner then offered the below dictionary definition of “electrode”:

A conductor which serves to **deliver, receive, collect, emit, deflect or control electric charge carriers.** **An electrode provides the path for current entering or leaving a medium such as a** dielectric, electrolytic solution, **semiconductor**, gas, or vacuum. . . . It is often a metal, and may consist for instance, of a wire, grid, plate or region.

Reply, 7-8 (citing Ex-1046, 237) (bolding from the Reply and highlighting added).

B. Infineon Explained Why the Usui-based Grounds Fail Under Petitioner’s Own Construction

As Infineon explained, the Usui structure Petitioner alleged is an electrode stack is not a conductor that provides the path for current entering or leaving Usui’s semiconductor 6 (*see* Usui Fig. 8), as mandated by the requirements of Petitioner’s construction highlighted *supra* §I.A. Paper 20 (“Sur-reply”) at 4-6. It is Usui’s *stud connection 10* that “make[s] connection to” and provides the path for current entering/leaving semiconductor 6. *Id.* (quoting Usui, 3:24-27). “If there is

an electrode in Usui Fig. 8, *it is – or at least includes – stud connection 10 under either party’s dictionary definition.*” *Id.*, 6 (emphasis original). Petitioner never identified stud connection 10 as part of Usui’s electrode because it is thicker than Usui’s alleged capping layer 19 and the claims require that the capping layer be thicker than the electrode’s bottommost metal layer. POR, 16-20; Sur-reply, 7-10.

C. The Board Held Petitioner to Requirements of Petitioner’s Own Construction and Found the Usui Grounds Did Not Meet Them

The Board adopted a simplified version of Petitioner’s construction and construed “electrode stack” to be “a conductor that provides a path for current entering or leaving a medium such as a semiconductor device.” FWD, 13-18 (rejecting Infineon’s construction as too narrow). As the highlighting in §I.A shows, these are requirements of *Petitioner’s* construction. The Board found that to prevail on its Usui-based Grounds, “Petitioner must show that Usui’s layers 13-15, 18, and 19 provide a path for current entering or leaving a medium such as a semiconductor device.” FWD, 21. The Board then found that Petitioner failed to do so. *Id.* Thus, the Board found that Petitioner failed to establish that the Usui meets requirements of *Petitioner’s own construction* of “electrode stack.”

D. The Board Did Not Violate the APA By Finding that Petitioner Failed to Meet Requirements of its Own Construction

The Board’s construction is not *narrower* than Petitioner’s proposed construction. Request, 8-9. The Board adopted a simplified version of Petitioner’s

construction that sufficed to resolve the parties’ dispute about whether Petitioner proved that Usui’s interconnect is an electrode stack. *Nidec*, 868 F.3d at 1017. If anything, the Board’s construction is **broad**er than Petitioner’s construction. The requirement Petitioner says is unduly narrow – that an electrode provide the path for current entering/leaving a medium – is a requirement of Petitioner’s own construction. *Supra* §I.A. Having argued that an electrode is limited in this way, Petitioner cannot now complain that the Board held Petitioner to that assertion.

1. Petitioner’s Construction Imposed the Path for Entering/Leaving Requirement

Petitioner concedes it “proposed the dictionary definition underlying the Board’s construction.” *Id.*, 8. Petitioner says the Board “omitted the definition’s broader clause that an electrode ‘serves to deliver, receive, collect, emit, deflect or control electric charge carriers.’” *Id.*, 1. But Petitioner did not offer two alternative constructions – it offered a single construction with multiple requirements.

Petitioner’s construction imposed two requirements that must **both** be met for a conductor to be an electrode. Petitioner alleged an electrode is (1) “**a conductor** which serves to deliver, receive, collect, emit, deflect, or control electric charge carriers” ***and*** (2) “**provides the path for current entering or leaving a medium such as a . . . semiconductor.**” EX1046, 237 (highlighting shows the requirements the Board adopted). Petitioner alleged “electrodes ‘deliver, receive, collect, emit, deflect or control electric charge carriers’ ***and*** provide a current

path.” Reply, 7-8; *id.*, 12 (similar). Petitioner also concedes that the “*full* [dictionary] definition” provided Petitioner’s alleged plain meaning. Request, 5, 8. Thus, the requirement that an electrode provide a path for current entering and leaving a medium is a requirement *Petitioner* advocated that the Board adopt.

2. Petitioner Complains of an Alleged Error it Invited

Petitioner says the Board’s construction excludes an insulated gate electrode because the insulating dielectric layers prevent current from entering/leaving the semiconductor through the gate electrode. Request, 1. To the extent the Board’s construction excludes an insulated gate electrode, it is because of the requirement – which *Petitioner* urged the Board to adopt – that an electrode provide a path for current entering or leaving a medium such as a semiconductor device.

Petitioner’s suggestion that the portion of its construction the Board did not adopt – requiring that an electrode *also* “deliver, receive, collect, emit, deflect or control electric charge carriers” – results in Petitioner’s construction covering an insulated gate electrode where the Board’s construction does not is plainly wrong. *Id.*, 8-10. Petitioner says the “control electric charge” portion of its definition covers an insulated gate electrode. *Id.*, 10. But Petitioner did not propose that as a standalone construction. *See supra* §I.D.1. Petitioner’s construction *also* (“and”) required that an electrode provide the path for current entering/leaving a medium like a semiconductor. It is the requirement that an electrode provide the path for

current entering/leaving the semiconductor that Petitioner says causes the Board's construction to exclude an insulated gate electrode. Request, 1 and 9-10. That requirement came from *Petitioner's own construction*.

3. Petitioner Had Every Opportunity and Motivation to Meet the Requirements in the Board's Construction

Petitioner's assertion that the Board violated its rights under the APA is baseless. Request, 8-9. Petitioner cites *Axonics* for the proposition that it is a violation of the APA for the Board to adopt a claim construction and then "den[y] petitioner a fair opportunity to present argument and evidence under it." *Id.*, 9. Here, Petitioner had every opportunity to "present argument and evidence" explaining how its prior art allegedly meets the requirements of the Board's construction – an electrode is a conductor that provides the path for current entering and leaving a medium like a semiconductor – because those were requirements of Petitioner's own construction. *See supra* §I.D.1. Petitioner's citations to *SAS* and *Hamilton Beach* fare no better. The Board did not adopt a construction "neither party requested nor anticipated." Request, 9. *Petitioner* "requested" that the Board find that an electrode must be a conductor that provides a path for current entering and leaving a medium. *See supra* §§ I.A and I.D.1.

II. THE BOARD CORRECTLY FOUND THAT PETITIONER FAILED TO MEET ITS BURDEN ON THE USUI-BASED GROUNDS

A. Petitioner's Assertion that the Board's Construction Excludes an Insulated Gate Electrode is Irrelevant to the Usui-Based Grounds

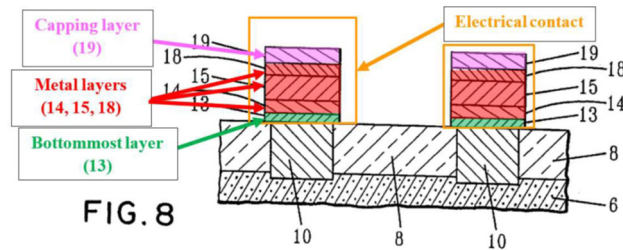
Usui does not disclose an insulated gate electrode and Petitioner never alleged it does. Petitioner's complaint that the Board's construction excludes an insulated gate electrode is irrelevant to the Usui-based Grounds because the Board is not required to adopt a perfect outer boundary construction. The Board is only required to construe a claim term to the extent necessary to resolve the parties' dispute and there was no dispute for the Board to resolve about whether Usui discloses an insulated gate electrode. *Nidec*, 868 F.3d at 1017.

B. The Board Found Petitioner Failed to Prove that Usui's Identified Structure Meets a Requirement of Petitioner's Own Construction

The Board properly resolved the parties' dispute about Usui. Infineon explained that Usui's "interconnect metallurgy structure" (layers 13-15 and 18-19) is not an electrode stack because it is not part of any device in Usui's semiconductor substrate 6. POR, 19. Indeed, Usui is explicit that its "interconnect" interconnects two or more devices. *Id.*; see e.g., Usui, 1:11-14 and 4:10-15.

It is Usui's stud 10 that makes contact with the semiconductor 6 and provides the path for current to enter and leave the semiconductor, so if there is an electrode in Usui's Fig. 8, it is (or at least includes) stud 10. POR, 18-20; Sur-reply, 3-9. Infineon explained that is fatal to the Usui-based Grounds because Petitioner never alleged that stud 10 is (or is part of) Usui's electrode stack given that metal stud 10 is thicker than Usui's alleged capping layer 19. Sur-reply, 4-6. If

stud 10 is the bottommost metal layer of an electrode stack in Usui, then other requirements of the claims are not met. POR, 16-20; Sur-reply, 7-10.



The Board resolved the parties' dispute by correctly finding that Petitioner failed to prove that Usui's interconnect (without stud 10) meets the requirement of *Petitioner's construction* that an electrode provide the path for current entering and leaving a medium like a semiconductor. FWD, 21-24. The Board correctly found that Petitioner and its expert Dr. Zhao never provided an "adequate explanation or evidence as to *why*" Usui's interconnect metallurgy structure forms an 'electrode stack,' i.e., a conductor that provides a path for current entering or leaving a medium such as a semiconductor device." *Id.*, 21-22.

The Request never even attempts to explain where Petitioner allegedly provided the explanation and evidence the Board found lacking. That is because, as Infineon pointed out (POR, 12-15), the Petition never explained why Usui's interconnect was allegedly an electrode stack and only cited testimony from Dr. Zhao that repeated the Petition's unsupported conclusory assertions word-for-word (Petition, 11-12). Petitioner does not – because it cannot – dispute that the Board properly applied the Board's precedential *Xerox* decision in refusing to credit Dr.

Zhao's conclusory petition-cited testimony. FWD, 22.

The Reply does not remedy Petitioner's failure to establish that Usui's interconnect is an electrode stack under Petitioner's own construction. The Reply has a single conclusory sentence alleging that Usui's interconnect meets Petitioner's construction. Reply, 12 ("Usui's interconnect is '[a] conductor which serves to deliver, receive, collect, emit, deflect, or control electric charge carries' and 'provides the path for current entering or leaving a medium,' consistent with the technical definition of 'electrode.' Ex-1047, ¶38; Ex-1037, 237."). The Reply offers no "explanation or evidence as to *why* Usui's interconnect" is an "electrode stack" under Petitioner's construction. FWD, 21-22. The cited evidence does not support this. In Ex-1047, ¶38, Dr. Zhao says Petitioner's dictionary definition provides the ordinary meaning of "electrode," but he never applies that definition to Usui. "EX-1037, 237" cites a non-existent page of the ITC's claim construction order that does not even construe "electrode stack," let alone apply it to Usui.

The assertion that the Board sided with Infineon on the Usui-based Grounds "despite all contrary record evidence" is baseless. Request, 13. The Board correctly found that Petitioner cited *no* evidence establishing that Usui's interconnect meets requirements of Petitioner's own construction of "electrode stack." FWD, 21-22.

Petitioner's complaints about the Board's citation to Infineon's expert fail. Request, 13-14. Given the Board's finding that Petitioner did not submit adequate

evidence to carry its burden (FWD, 21-22), it was unnecessary for the Board to cite *any* rebuttal evidence from Infineon. Moreover, the cited testimony did *not* rely on “Patent Owner’s rejected construction.” Request, 14. The Board cited Dr. Piner’s explanation that “interconnects (such as Usui’s interconnect metallurgy structure) and *electrical contacts* (such as that claimed in the ’562 Patent) are not the same thing.” FWD, 22-23; EX1001, 5:53-6:62 (the claims require “[a]n electrical contact” for use on a semiconductor device, the electrical contact comprising an electrode stack). The Board also credited testimony that Usui’s interconnects are not electrical contacts of a semiconductor device because they form “*electrical connections or wiring* such as *between* active and/or passive *devices* of an integrated circuit structure.” FWD, 23 (emphasis original) (quoting Usui, 1:11-14). This testimony did not rely on Infineon’s “electrode stack” construction.

The assertion that “undisputed evidence . . . showed that Usui’s interconnect met the Board’s [] construction” fails. Request, 14. Petitioner submitted *no* such evidence. FWD, 21-22. Usui’s interconnect carrying current *between devices* does not show that Usui meets the Board’s construction. Request, 14. The Board credited Dr. Piner’s explanation that Usui’s interconnect is not part of a device in Usui’s semiconductor substrate 6, let alone an electrical contact comprising an electrode of such a device. FWD, 22-23. He never said Usui’s interconnect (rather than stud 10) provides the path for current entering/leaving the semiconductor. His

testimony does not show that Usui meets the Board’s construction. As the Board found, his testimony supports exactly the opposite conclusion. FWD, 22-23.

The Board did not “disregard[]” Dr. Zhao’s testimony purportedly showing how Usui met Infineon’s construction. Request, 14. The Board was “not persuaded that Petitioner’s arguments in this regard sufficiently show that Usui discloses an ‘electrode stack’ as recited in claim 1.” FWD, 23. That was indisputably correct. Infineon’s construction did not have the “path for entering and leaving a medium” language from Petitioner’s construction. None of Petitioner’s arguments and evidence showed that Usui’s interconnect (without Usui’s stud 10) somehow provides the path for current to enter and leave Usui’s semiconductor 6. *Id.*

The Board correctly found that Petitioner failed to carry its burden because it failed to prove that Usui’s interconnect meets requirements of Petitioner’s own “electrode stack” construction. FWD, 21-24.

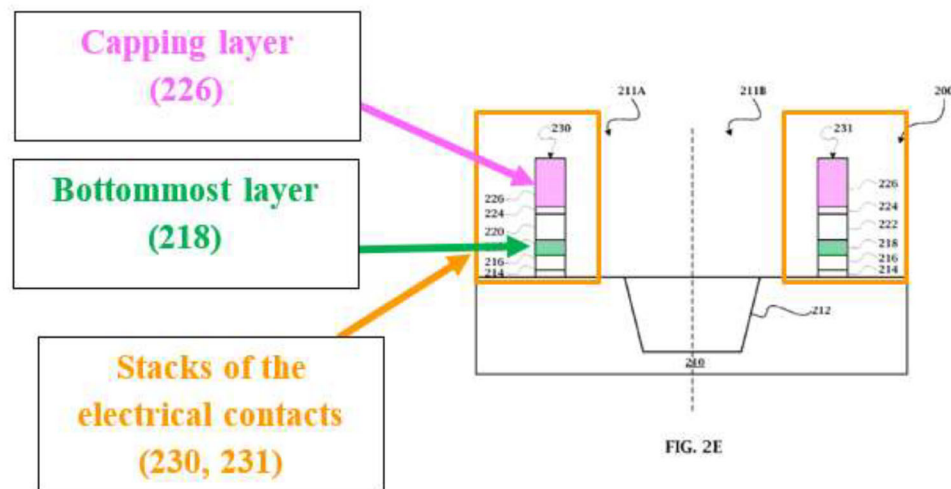
III. THE BOARD CORRECTLY FOUND THAT PETITIONER FAILED TO MEET ITS BURDEN ON THE YU-BASED GROUNDS

A. The Parties Disputed Whether Petitioner Accurately Identified Yu’s Electrode Stack

The Parties agreed that Yu discloses an insulated gate electrode. POR, 45; Petition, 53-54. The dispute for Grounds 5-8 (“Yu-based Grounds”) that the Board resolved in Infineon’s favor was whether Petitioner *accurately identified* the layers in Yu’s electrode stack and thereby proved that diffusion barrier layer 218 was the

bottommost metal layer in Yu's electrode stack as Petitioner alleged. Petition, 43-44; POR, 47-55.

As the Board noted, Petitioner alleged that Yu's *entire* metal gate stack (230 or 231) met the claimed electrode stack. FWD, 27-28 (reproducing Petitioner's annotated figure below). Infineon explained this was wrong because the gate stacks (230, 231) include insulating dielectric layers 214, 216. POR, 49-54 (the '562 Patent is *explicit* that the insulating dielectric layers of an insulated gate electrode like Yu's are not part of the electrode). Infineon explained that because the *sole* argument Petitioner advanced for why Yu's diffusion barrier layer 218 was allegedly part of Yu's electrode stack – that Yu's *entire* gate stack 230, 231 was an electrode – was wrong, the Yu-based Grounds failed. *Id.*; FWD, 29 (citing same).



Infineon also presented evidence (Ex. 2002) showing that POSAs did not consider a diffusion barrier layer between an insulated gate electrode and an

insulating layer – like in Yu – to be part of the gate electrode. POR, 48; Sur-reply, 27-28. Petitioner never disputed that evidence.

B. The Board Held Petitioner to Its Failed Arguments

The Board correctly rejected the Petition’s assertion that Yu’s *entire* gate stack is an electrode stack. FWD, 30-31. The Board correctly found that Petitioner’s expert merely repeated the Petition’s conclusory assertion “*verbatim*” and thus refused to credit his testimony under the Board’s *Xerox* precedent. *Id.* (emphasis original).

In Reply, Petitioner alleged Yu’s electrode was everything in Yu’s gate stack 230, 231 except the insulating layers. Reply, 26-27 (alleging the Petition did not argue that the *entire* gate stack was the electrode). The Board rejected this improper new argument and noted that the Petition’s annotated figure and its text unambiguously pointed to the *entire* gate stack as the electrode stack. FWD, 30-31.

The Board found that “[b]ecause Petitioner identified Yu’s metal gate stacks 230, 231 in their *entirety* as the recited ‘electrode stack,’ Petitioner must show that *all* of the layers in metal gate stacks 230, 231, including dielectric layers 214 and 216, together form” an electrode stack. FWD, 31. The Board required Petitioner to show that Yu’s entire gate stack met the requirements the Board adopted from *Petitioner’s* “electrode stack” construction and thus be “a conductor that provides a path for current entering or leaving a medium such as a semiconductor device.”

FWD, 31; *supra* §I.D.1. The Board correctly found that Petitioner failed to do so.

FWD, 31 (citing Petitioner’s admission that Yu’s dielectrics are “nonconductors”).

C. Petitioner Must Live With the Consequences of the Claim Construction Requirements Petitioner Itself Advanced

Petitioner was free to present its Yu-based Grounds however it liked.

Petitioner failed to carry its burden for two independent reasons. *First*, Petitioner alleged that Yu’s entire gate stack was an electrode stack which was clearly wrong because the entire gate stack includes the dielectric layers which are not part of Yu’s electrode. FWD, 30-31. *Second*, Petitioner offered a construction of “electrode stack” that Yu’s entire gate stack does not meet. *Id.* After losing on its chosen construction, Petitioner has buyer’s remorse. The Director should reject Petitioner’s Request and, like the Board did, hold Petitioner to claim construction requirements Petitioner itself advanced. On appeal, Petitioner will be estopped from arguing that the Board’s construction is wrong because it requires that an “electrode stack” be a conductor that provides the path for current entering and leaving a medium because Petitioner itself advocated for those requirements. *See supra* §I.D.1; *Intel Corp. v. XMTT, Inc.*, No. 2021-2127, 2022 WL 1152312, at *1 (Fed. Cir. Apr. 19, 2022) (“Intel is judicially estopped from raising its claim construction argument. The Board adopted the claim construction for which Intel advocated. Yet, Intel now changes its position and advocates for a claim construction that is clearly inconsistent with its position before the Board.”).

Petitioner's assertion that the Board violated its rights under the APA fail for the reasons discussed *supra* §I.D. Petitioner had every opportunity to explain how and why Yu's alleged "electrode stack" is a conductor that provides a path for current entering and leaving the semiconductor because Petitioner itself told the Board that an electrode stack must meet those requirements. *Id.*

D. Petitioner's Challenges to the Board's Yu Fact Findings Fail

Yu is not "just like" a '562 Patent embodiment. Request, 5-6, 9-10. The '562 Patent does not disclose an insulated gate electrode with a diffusion barrier layer between the electrode and an insulating layer. The *undisputed* evidence is that a barrier layer like Yu's layer 218 is not part of the gate electrode; layer 218 sits *between* the electrode and the insulator. Ex. 2002; Sur-reply, 27-28.

Petitioner's remaining arguments repeat failed Reply arguments. *See* Sur-reply, 26-29. That the claims use the open-ended "including" so that other structures are possible (Request, 7) does not establish that Yu's diffusion barrier layer 218 and insulating layers 214 and 216 are part of Yu's gate electrode. And Yu's gate electrodes having "all claimed features of the '562 patent's gate electrode" (Request, 7) ignores that the failure the Board found was that Petitioner did not prove that Yu's *entire* gate stack (including diffusion barrier layer 218 and insulators 214, 216) is a gate electrode. FWD, 31.

Date: August 6, 2026

/Richard Giunta /
Richard F. Giunta, Reg. No. 36,149

CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (e)(4)

I certify that on August 6, 2026, a copy of the foregoing document, including any exhibits filed therewith, is being served via electronic mail, as previously consented to by Petitioner upon the following:

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