

EXHIBIT 903-B

***Inpria Corporation v. Lam Research Corp.*, Case No. 1-22-cv-01359-CJB
Exhibit 903-B – Invalidity Claim Chart for U.S. Patent No. 11,673,903**

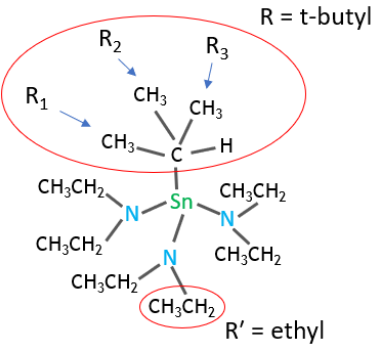
Hanssgen, D., et al. “Synthesis of the First Mono-t-Butyltin Element Compounds,” J. Organometallic Chemistry 293 (1985): 191-195 (“Hanssgen”) published on **September 24, 1985**. Hanssgen is prior art under post-AIA 35 U.S.C. §102(a)(1) because it published on **September 24, 1985**, which is before the ’903 patent’s earliest possible priority date of **April 11, 2018**.

Hanssgen anticipates asserted claims 1-4, and 6-9 of the ’903 patent under 35 U.S.C. § 102, at least for the reasons explained in Defendant’s final Invalidity Contentions and as set forth in this chart. In addition to the citations set forth in the charts below, Defendant further incorporates by reference, as if fully set forth in, the arguments, evidence, and statements set forth in IPR2025-00267.

With respect to the anticipation of those claims under 35 U.S.C. § 102, one or more of the following principles apply: “The dispositive question regarding anticipation is whether one skilled in the art would reasonably understand or infer from the prior art reference’s teaching that every claim limitation was disclosed in that single reference.” *Akamai Techs., Inc. v. Cable & Wireless Internet Servs., Inc.*, 344 F.3d 1186, 1192-93 (Fed. Cir. 2003). “[A] reference can anticipate a claim even if it does not expressly spell out all the limitations arranged or combined as in the claim, if a person of skill in the art, reading the reference, would at once envisage the claimed arrangement or combination.” *Kennametal, Inc. v. Ingersoll Cutting Tool Co.*, 780 F.3d 1376, 1381 (Fed. Cir. 2015) (citing *In re Petering*, 301 F.2d 676, 681 (C.C.P.A. 1962)). Likewise, “the fact that a characteristic is a necessary feature or result of a prior art embodiment . . . is enough for inherent anticipation, even if that fact was unknown at the time of the prior invention.” *Toro Co. v. Deere & Co.*, 355 F.3d 1313, 1321 (Fed. Cir. 2004). A person of ordinary skill in the art reading Hanssgen would have at once envisaged the claimed subject matter of each of claims 1-4, and 6-9 in accordance with the principles and rationales set forth above.

This claim chart is meant to illustrate how Hanssgen invalidates claims 1-4, and 6-9. By not discussing portions of a reference in the claim chart below, Defendant does not waive its right to rely on these portions of the reference. Instead, Defendant expressly reserves the right to rely on any and all portions of the cited reference. These contentions are not an admission by Defendant that any accused materials are covered by or infringe claims 1-4, and 6-9 of the ’903 patent, particularly after the claims are construed by the Court. These contentions are not an admission by Defendant as to the proper scope of any asserted claim, the proper construction of any term in any asserted claim, or whether particular elements may be construed at all, or instead, are indefinite. Defendant reserves the right to modify, amend, or supplement these contentions as additional information becomes available during the course of this action and in view of any applicable claim construction order from the Court.

'903 Patent Claims	Disclosure of Prior Art
Claim 1	
[1p] A high purity liquid composition comprising: a monoalkyl tin triamide compound represented by the chemical formula $\text{RSn}(\text{NR}'_2)_3$ and	Hänssgen discloses a high purity liquid composition having a monoalkyl tin triamide compound represented by the chemical formula $\text{RSn}(\text{NR}'_2)_3$, namely the analytically pure $\text{tBuSn}(\text{NEt}_2)_3$. Hänssgen discloses “t-Butyl-tris(diethylamino)stannane,” referred to as “compound (I)”, i.e., $\text{tBuSn}(\text{NEt}_2)_3$, that was obtained “by Sn-alkylation of tetrakis(diethylamino)stannane with lithium-t-butyl.” <i>Id.</i>, Summary, p. 192. Hänssgen provides a detailed description of the reactions employed for synthesizing (I) and further explains that “analytically pure I can be obtained by fractiona[l] distillation of the benzene phase[,]” describing the distilled compound as “oil” (i.e., a liquid). <i>Id.</i>, p. 192, 194. $\text{tBuSn}(\text{NEt}_2)_3$ is a compound represented by the chemical formula $\text{RSn}(\text{NR}'_2)_3$ where R is t-butyl (i.e., monoalkyl), and where each R' is ethyl of the three diethylamido groups (i.e., triamide).
[1a] no more than 0.5 mole % dialkyltin compounds as an impurity relative to the total tin amount,	Hänssgen discloses “no more than 0.5 mole % dialkyltin compounds as an impurity relative to the total tin amount.” Hänssgen discloses that the “reaction of $(\text{Et}_2\text{N})_4\text{Sn}$ with equimolar quantities of lithium-t-butyl, by splitting a tin-nitrogen bond according to equation 2a, which yields triamino-t-butylstannane (I) and lithium diethyl amide,” as shown below: $ (\text{Et}_2\text{N})_4\text{Sn} \xrightarrow[\text{- LiNEt}_2]{\text{+ t-BuLi}} \underset{\text{(I)}}{\text{t-BuSn}(\text{NEt}_2)_3} \xrightarrow[\text{- LiNEt}_2]{\text{+ t-BuLi}} \boxed{\text{t-Bu}_2\text{Sn}(\text{NEt}_2)_2} \quad (2a) $ <i>Id.</i> p. 192. Equation 2a also shows that the chemical reaction does not proceed to generate the dialkyl tin compound, i.e., $\text{t-Bu}_2\text{Sn}(\text{NEt}_2)_2$ (blue), as indicated by the double hash marks through the line above (red annotation). Hänssgen states equation 2a “proceeds practically quantitatively; there are no indications of secondary reactions.” <i>Id.</i> p. 192. Hänssgen further confirms “analytically pure I [$\text{tBuSn}(\text{NEt}_2)_3$] can be obtained by fractiona[l] distillation of the benzene phase,” <i>Id.</i> p. 192, which a person of ordinary skill in the art would have understood to mean no or negligible dialkyltin impurity.

'903 Patent Claims	Disclosure of Prior Art
[1b] wherein R is a hydrocarbyl group with 1-31 carbon atoms, and	Hanssgen discloses that R is a hydrocarbyl group with 1-31 carbon atoms. tBuSn(NEt ₂) ₃ is a compound represented by the chemical formula RSn(NR' ₂) ₃ where R is t-butyl (4 carbon atoms). <i>Id.</i> p. 192.
[1c] wherein R' is a hydrocarbyl group with 1-10 carbon atoms.	Hanssgen discloses that R' is a hydrocarbyl group with 1-10 carbon atoms. tBuSn(NEt ₂) ₃ is a compound represented by the chemical formula RSn(NR' ₂) ₃ where each R' is ethyl (2 carbon atoms). <i>Id.</i> p. 192.
Claim 2	
The composition of claim 1 wherein R is a branched alkyl ligand represented by R ¹ R ² R ³ C-, where R ¹ and R ² are independently an alkyl group with 1-10 carbon atoms, and R ³ is hydrogen or an alkyl group with 1-10 carbon atoms.	Hanssgen discloses that R is a branched alkyl ligand represented by R¹R²R³C--, where R¹ and R² are independently an alkyl group with 1-10 carbon atoms, and R³ is hydrogen or an alkyl group with 1-10 carbon atoms. Hanssgen discloses synthesis of tBuSn(NEt₂)₃, that is a compound represented by the chemical formula RSn(NR'₂)₃ where R is a branched alkyl ligand represented by R¹R²R³C—, where R¹, R² and R³ are methyl (1 carbon atom). <i>Id.</i> p. 192. 
Claim 3	

'903 Patent Claims	Disclosure of Prior Art
The composition of claim 1 wherein R comprises methyl (CH₃—), ethyl (CH₃CH₂—), isopropyl (CH₃CH₂CH—), tert-butyl ((CH₃)₃C—), tert-amyl (CH₃CH₂(CH₃)₂C—), sec-butyl (CH₃(CH₃CH₂)CH—), neopentyl (CH₃)₃CCH₂—, cyclohexyl, cyclopentyl, cyclobutyl, or cyclopropyl.	Hanssgen discloses that R includes methyl (CH₃—), ethyl (CH₃CH₂—), isopropyl (CH₃CH₂CH—), tert-butyl ((CH₃)₃C—), tert-amyl (CH₃CH₂(CH₃)₂C—), sec-butyl (CH₃(CH₃CH₂)CH—), neopentyl (CH₃)₃CCH₂—, cyclohexyl, cyclopentyl, cyclobutyl, or cyclopropyl. Hanssgen discloses synthesis of tBuSn(NEt₂)₃, that is a compound represented by the chemical formula RSn(NR'₂)₃ where R comprises tert-butyl ((CH₃)₃C—). <i>Id.</i> p. 192.
Claim 4	
The composition of claim 1 wherein R' comprises a methyl group, ethyl group, isopropyl group, or t-butyl group.	Hänssgen discloses “R’ comprises a methyl group, ethyl group, isopropyl group, or t-butyl group.” Hanssgen discloses synthesis of tBuSn(NEt₂)₃ is a compound represented by the chemical formula RSn(NR'₂)₃ where R' comprises an ethyl group.
Claim 6	
The composition of claim 1 comprising essentially no dialkyltin compounds as measured with an approximate 0.1 mole % detection limit.	Hanssgen discloses the composition “comprising essentially no dialkyltin compounds as measured with an approximate 0.1 mole % detection limit.” Hanssgen discloses synthesis of “analytically pure” tBuSn(NEt₂)₃ and indicates that the equation does not proceed to generate any dialkyl tin compound, <i>Id.</i> p. 192, so a person of ordinary skill in the art would have understood no or negligible dialkyltin impurity is present in the compound.
Claim 7	

'903 Patent Claims	Disclosure of Prior Art
A solution comprising the composition of claim 1 and an organic solvent.	Hanssgen discloses a “solution of 3.93 g (10 mmol) [Compound] I in 20 ml dichloromethane;” compound (I) is tBuSn(NEt₂)₃ and meets every limitation of claim 1. <i>Id.</i> p. 194. Dichloromethane is an organic solvent. Hanssgen further teaches that t-butanol, which is an alcohol and an organic solvent, is added to the solution. <i>Id.</i> p. 194.
Claim 8	
The solution of claim 7 having a concentration from about 0.005M to about 0.5M and wherein the solvent comprises an alcohol.	Hanssgen discloses the solution having a concentration from about 0.005M to about 0.5M and wherein the solvent comprises an alcohol. Hanssgen teaches t-butanol, an alcohol solvent, added to the solution including compound (I), so a person of ordinary skill in the art would have understood the solvent comprises an alcohol. <i>Id.</i> p. 194. Hanssgen teaches a solution concentration within the range from about 0.005M to about 0.5M. Hanssgen discloses a “solution of 3.93 g (10 mmol) [Compound] I in 20 ml dichloromethane.” <i>Id.</i> The molar concentration of Compound I in 20 ml dichloromethane is about 0.5 M (i.e., 10 mmol/20 ml= 0.5 mol/l). After additional solvent, i.e., 2.2 g (30 mmol) t-butanol, was added to the solution, the molar concentration decreased slightly, i.e., slightly lower than about 0.5M, which is within the claimed range of about 0.005M to about 0.5M.
Claim 9	
The solution of claim 7 wherein R comprises methyl (CH ₃ —), ethyl (CH ₃ CH ₂ —), isopropyl (CH ₃ CH ₂ CH ₂ —), tert-butyl ((CH ₃) ₃ C—), tert-amyl (CH ₃ CH ₂ (CH ₃) ₂ C—), sec-butyl	Hanssgen discloses that wherein R comprises methyl (CH₃—), ethyl (CH₃CH₂—), isopropyl (CH₃CH₂CH₂—), tert-butyl ((CH₃)₃C—), tert-amyl (CH₃CH₂(CH₃)₂C—), sec-butyl (CH₃(CH₃CH₂)CH—), neopentyl (CH₃)₃CCH₂—, cyclohexyl, cyclopentyl, cyclobutyl, or cyclopropyl, and wherein R' comprises a methyl group, ethyl group, isopropyl group, t-butyl group, or t-amyl group. Hanssgen teaches the synthesis of tBuSn(NEt₂)₃ that is a compound represented by the chemical formula RSn(NR'₂)₃ where R comprises tert-butyl ((CH₃)₃C—) and R' comprises an ethyl group.

'903 Patent Claims	Disclosure of Prior Art
(CH₃(CH₃CH₂)CH—), neopentyl (CH₃)₃CCH₂—), cyclohexyl, cyclopentyl, cyclobutyl, or cyclopropyl, and wherein R' comprises a methyl group, ethyl group, isopropyl group, t-butyl group, or t-amyl group.	