

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ENTEGRIS, INC.
Petitioner

v.

INPRIA CORP.
Patent Owner

Case No. IPR2025-00267
Patent 11,673,903

**PETITIONER'S SUPPLEMENTAL BRIEF ON
DISCRETIONARY DENIAL**

Inpria’s brief (Paper 15) argues that this IPR should be denied because the prior pending litigation between Inpria and third-party Lam has now settled. But that settlement, and lack of any remaining parallel litigation, is the reason why this proceeding is an efficient use of Board resources. Inpria’s positions are factually incorrect and seek to prevent Entegris’s valid use of the IPR process.

Inpria implies that Entegris’s IPR is covered by the settlement agreement and/or that Entegris is “carry[ing] the torch” for Lam. Paper 15 at 1. Neither is true. Entegris was not a party to the settlement, and Entegris did not negotiate or have prior knowledge of the settlement. Entegris’s continued pursuit of this IPR proves that Entegris has no special relationship with Lam in this proceeding. Lam’s public release about the settlement never once mentions Entegris. EX1030. That release in fact states that the settlement enables Inpria’s parent (JSR) to sell chemistries as a “collaboration” and “partnership” with Lam—with no involvement of Entegris. *Id.*

The Board’s resources would be efficiently used in this proceeding. Entegris provides the chemistries that Inpria accused of infringing the ’903 Patent to other customers—not just Lam. The merits of this proceeding are strong. Those merits and the material prosecution errors identified in the Petition are not at issue in any other proceeding. Accordingly, Entegris respectfully requests the Board institute this IPR. Respectfully submitted,

October 10, 2025
Date

/ Eliot D. Williams /
Eliot D. Williams (Reg. No. 50,822)

CERTIFICATE OF COMPLIANCE

1. Pursuant to 37 C.F.R. §42.24(d), the undersigned certifies that the foregoing Petitioner's Response to Patent Owner's Discretionary Denial Brief is no more than 1 page and therefore complies with the limitations set forth by the October 8, 2025 email authorizing Petitioner to file the present brief.

2. This Petition complies with the general format requirements of 37 C.F.R. § 42.6(a) and has been prepared using Microsoft® Word in 14-point Times New Roman.

Respectfully submitted,
BAKER BOTTS L.L.P.

October 10, 2025
Date

/ Eliot D. Williams /
Eliot D. Williams (Reg. No. 50,822)
LEAD COUNSEL FOR PETITIONER

CERTIFICATE OF SERVICE

In accordance with 37 C.F.R. §§42.6(e) and 42.105, the undersigned certifies that on the 29th day September 2025, a complete and entire copy of the foregoing Petitioner's Supplemental Brief Regarding Discretionary Denial with supporting exhibit and Updated Exhibit List were served via email to Patent Owner at the following addresses:

PH-Entegris-Inpria-IPR@paulhastings.com

Respectfully submitted,
BAKER BOTTS L.L.P.

October 10, 2025
Date

/ Eliot D. Williams /
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LEAD COUNSEL FOR PETITIONER