

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ENTEGRIS, INC.,
Petitioner

v.

INPRIA CORP.,
Patent Owner

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

**PATENT OWNER'S REPLY TO PETITIONER'S
SECOND SUPPLEMENTAL BRIEF ON DISCRETIONARY DENIAL**

LIST OF EXHIBITS

<u>Exhibit No.</u>	<u>Description</u>
2001	Case Docket for <i>Inpria Corp. v. Lam Research Corp.</i> , C.A. No. 22-01359-CJB (D. Del.)
2002	Order, <i>Inpria Corp. v. Lam Research Corp.</i> , C.A. No. 22-01359-CJB (D. Del.), D.I. 116 (May 3, 2024)
2003	Lam's Initial Invalidity Contentions, <i>Inpria Corp. v. Lam Research Corp.</i> , C.A. No. 22-01359-CJB (D. Del.) (May 13, 2024)
2004-2027	<i>Reserved</i>
2028	Lam-Entegris Strategic Collaboration Announcement, <i>available at</i> https://www.entegris.com/en/home/about-us/news/lam-research-entegris-gelest-team-team-up-to-advance-euv-dry-resist-technology-ecosystem-july-2022.html (last visited May 12, 2025), and https://www.prnewswire.com/news-releases/lam-research-entegris-gelest-team-up-to-advance-euv-dry-resist-technology-ecosystem-301584404.html (last visited May 12, 2025)
2029	Amended Complaint, <i>Inpria Corp. v. Lam Research Corp.</i> , C.A. No. 22-01359-CJB (D. Del.), D.I. 43 (Dec. 13, 2023)
2030	Lam's Answer, <i>Inpria Corp. v. Lam Research Corp.</i> , C.A. No. 22-01359-CJB (D. Del.), D.I. 52 (Jan. 12, 2024)
2031	Lam's Initial Invalidity Contentions, Ex. 13, <i>Inpria Corp. v. Lam Research Corp.</i> , C.A. No. 22-01359-CJB (D. Del.) (May 13, 2024)
2032	Lam's Final Invalidity Contentions, Ex. 903-A, <i>Inpria Corp. v. Lam Research Corp.</i> , C.A. No. 22-01359-CJB (D. Del.) (Feb. 20, 2025)
2033	Lam's Final Invalidity Contentions, Ex. 903-B, <i>Inpria Corp. v. Lam Research Corp.</i> , C.A. No. 22-01359-CJB (D. Del.) (Feb. 20, 2025)
2034	Lam's Final Invalidity Contentions, Ex. 903-C, <i>Inpria Corp. v. Lam Research Corp.</i> , C.A. No. 22-01359-CJB (D. Del.) (Feb. 20, 2025)
2035	Lam's Final Invalidity Contentions, Ex. 903-D, <i>Inpria Corp. v. Lam Research Corp.</i> , C.A. No. 22-01359-CJB (D. Del.) (Feb. 20, 2025)
2036	Lam's Final Invalidity Contentions, Ex. 903-E, <i>Inpria Corp. v. Lam Research Corp.</i> , C.A. No. 22-01359-CJB (D. Del.) (Feb. 20, 2025)

2037	Lam's Final Invalidity Contentions, Ex. 903-F, <i>Inpria Corp. v. Lam Research Corp.</i> , C.A. No. 22-01359-CJB (D. Del.) (Feb. 20, 2025)
2038	U.S. Patent No. 8,198,352
2039	May 9, 2025 email correspondence between counsel for Entegris and counsel for Inpria regarding Lam Common Interest
2040	JSR Corporation/Inpria Corporation and Lam Research Enter Cross Licensing and Collaboration Agreement to Advance Semiconductor Manufacturing, <i>available at</i> https://www.jsr.co.jp/jsr_e/news/2025/20250916.html (last visited October 2, 2025)
2041	Lam Research and JSR Corporation/Inpria Corporation Enter Cross-Licensing, Collaboration Agreement to Advance Semiconductor Manufacturing, <i>available at</i> https://investor.lamresearch.com/2025-09-15-Lam-Research-and-JSR-Corporation-Inpria-Corporation-Enter-Cross-Licensing,-Collaboration-Agreement-to-Advance-Semiconductor-Manufacturing (last visited October 2, 2025)
2042	PTAB de-designates SharkNinja Operating LLC v. iRobot Corp., <i>available at</i> https://www.uspto.gov/subscription-center/2025/ptab-de-designates-decision (last visited October 2, 2025)
2043	Entegris IDS Citing the '903 Patent Application US20190315781A1 (May 4, 2022)

Entegris's second supplemental brief on discretionary denial is an exercise in misdirection. Entegris implies Inpria did not disclose a press release regarding the settlement between Inpria and Lam by citing new EX1030, when in reality Inpria *relied* on an identical press release (Paper 15; EX2041). It is Entegris that failed to address the press release that published before its first supplemental brief (Paper 14).

On the merits, the press release does not undermine the relationship between Entegris and Lam. As Inpria explained (Paper 15 at 3): (1) Entegris and Lam conveniently split the work of challenging Inpria's patents in IPRs filed within days of Lam's bar date; (2) Entegris's IPR was incorporated into Lam's invalidity contentions; (3) Lam and Entegris invoked common interest privilege; and (4) Entegris quickly obtained (and filed in this IPR) an email sent only to Lam's counsel. (EX1028). Entegris's paper ignores these points, effectively conceding them. That alone justifies discretionary denial.

Entegris's admission that it "provides the chemistries" to Lam that were accused of infringement (Paper 17 at 1) weighs in favor of denial considering Entegris has known of the '903 patent application since at least 2022 (EX2043 at 1 (citing Edson app. pub. no. 2019/0315781)), yet it delayed its challenge until Lam's bar date. The Board should not waste resources on review of Entegris's meritless grounds that are based on Entegris's employee's unsubstantiated experiments that include various procedures not found in the prior art. Paper 15 at 5.

Dated: October 14, 2025

Respectfully submitted,

By: / Naveen Modi /
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Counsel for Patent Owner

CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2025, I caused a true and correct copy of the foregoing Patent Owner's Reply to Petitioner's Second Supplemental Brief on Discretionary Denial to be served via email on Petitioner at the following addresses:

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Respectfully submitted,

Dated: October 14, 2025

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