

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 SUPPLEMENTAL BRIEF REGARDING
LAM'S STATUS AS AN UNNAMED REAL PARTY-IN-INTEREST**

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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)

2044	Oral Order regarding claim construction on term 5 in <i>Inpria Corp. v. Lam Research Corp.</i> , C.A. No. 22-01359-CJB (D. Del.) (Sept. 8, 2025)
2045	Transcript of Board Teleconference, dated December 3, 2025
2046	Document Bates Labelled ENTEGRIS.903IPR.000061-67 (Declaration of Dr. Joseph Rivers (Dec. 12, 2025))
2047	Document Bates Labelled ENTEGRIS.903IPR.000005-15 ([REDACTED])
2048	Document Bates Labelled ENTEGRIS.903IPR.000028-43 ([REDACTED])
2049	Document Bates Labelled ENTEGRIS.903IPR.000016-23 ([REDACTED])
2050	Document Bates Labelled ENTEGRIS.903IPR.000026-27 ([REDACTED])
2051	Document Bates Labelled ENTEGRIS.903IPR.000044-52 ([REDACTED])
2052	Document Bates Labelled ENTEGRIS.903IPR.000053-59 ([REDACTED])
2053	Document Bates Labelled ENTEGRIS.903IPR.000060 ([REDACTED])
2054	Document Bates Labelled ENTEGRIS.903IPR.000001-4 ([REDACTED])

2055	Deposition Transcript of Dr. Joseph Rivers (January 9, 2026)
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I. INTRODUCTION

Discovery confirmed what Inpria argued from the beginning—Entegris should have listed Lam as an RPI on its Petition, but instead intentionally downplayed the relationship. Paper 7 at 18-20; Paper 10 at 3-10; Paper 17 at 1. The documents show that [REDACTED]

[REDACTED] EX2054 at 1; EX2047; EX2048. Entegris tries to undermine these documents through a declaration by one of its employees (Dr. Joseph Rivers) who was willing to attest to broad characterizations about the agreements between Entegris and Lam, and the preparation of the IPR. EX2046. During deposition, however, it became clear that Dr. Rivers has little to no personal knowledge about the assertions in his declaration, raising the question of why he was chosen to submit the declaration in the first place. And the information that Dr. Rivers did know was fundamentally at odds with his declaration, with him admitting for example [REDACTED]

[REDACTED] EX2055 at 159:22-161:15.

Because Entegris intentionally omitted Lam as an RPI, Entegris's Petition must be accorded a new filing date, and is now time barred. *Corning Optical Communications RF, LLC v. PPC Broadband, Inc.*, IPR2014-00440, Paper 68 at 23-25 (Aug. 18, 2015) (precedential).

II. THE DOCUMENTS CONFIRM LAM IS AN UNNAMED RPI

Pursuant to the Board’s Order (Paper 24), Entegris produced multiple documents that confirm that Lam should have been listed as an RPI because it is a “clear beneficiary that has a preexisting, established relationship with” Entegris. *See RPX Corp. v. Applications in Internet Time, LLC*, IPR2015-01750, Paper 128 at 2 (October 2, 2020) (precedential) (quotations omitted); *see also Ventex Co. v. Columbia Sportswear N. Am., Inc.*, IPR2017-00651, Paper 152 at 7-11 (Jan. 24, 2019) (precedential) (RPI where parties “had a specially structured, preexisting, and well established business relationship with one another, including indemnification and exclusivity arrangements”).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] EX2047 at 2, and [REDACTED]

[REDACTED]

EX2048 at 5. [REDACTED]

[REDACTED] *Id.* at 123:22-124:6. Indeed, [REDACTED]

[REDACTED] EX2047 at 1-2 ([REDACTED])

[REDACTED]). These entanglements demonstrate that Entegris's interest is derivative of Lam's business. *See Ventex* at 7-8.

Commercial Control: [REDACTED] Lam exercises significant commercial control over Entegris with respect to the precursor materials covered by the '903 patent. *See Ventex* at 9. The [REDACTED]

[REDACTED] EX2047 at 3 [REDACTED]
[REDACTED] *id.* [REDACTED]
[REDACTED] *id.* at 5
[REDACTED] even [REDACTED]
[REDACTED], *id.* at 6 ([REDACTED]).

Indemnity: Entegris argued that "we had no indemnity obligation." EX2045 at 21:22. Not true. [REDACTED]
[REDACTED]
[REDACTED]
EX2047 at 8 [REDACTED] EX2048 at 12 [REDACTED] *see also* EX2049, EX2051, EX2052 ([REDACTED]).

Dr. Rivers's attempts to undermine this [REDACTED] should be rejected. EX2046 at ¶¶ 11, 13. He includes legal conclusions regarding [REDACTED]
[REDACTED] *id.*, but in his deposition he admitted

EX2055 at 36:14-15; 140:15-141:3; 155:2-13.

Entegris itself admitted it supplied the “chemistries that were threatened by Inpria in the earlier litigation” against Lam. Paper 14 at 1; EX2045 at 21:14-19. point to an RPI relationship. *Ventex* at 7, 10; *cf. Luminex Int’l Co. v. Signify Holdings B.V.*, IPR2024-00101, Paper 20 at 13-14 (Director Nov. 21, 2024) (distinguishing *Ventex* where,).

Common Interest: Although it did not file its petition until after Inpria asserted the ’903 patent against Lam and EX2054.

At the time Entegris filed its petition,

Id. at 1. This shared interest made Lam a clear beneficiary of the Petition, further supporting Lam’s status as an unnamed RPI. *Ventex* at 8-10. Entegris argued it has “its own interests” in invalidating the ’903 patent, *see* Paper 10 at 1; EX2046 at ¶¶ 6-7, but “that does not address whether [Lam] is a real party in interest—‘it is not an either-or proposition.’” *Ventex* at 9 (quoting *AIT*, 897 F.3d at 1353).

Dr. Rivers's Declaration: Dr. Rivers's declaration (EX2046) cannot be credited. His deposition revealed that he lacks personal knowledge— [REDACTED] EX2055 at 114:17-115:5; 147:12-148:7 [REDACTED] *id.* at 21:8-16; 107:7-22), and [REDACTED] *id.* at 12:20-14:5; 48:17-20; 50:2-52:16; 77:2-7; 92:18-93:3. [REDACTED]

[REDACTED]

Id. at 56:17-58:5. In fact, Dr. Rivers [REDACTED]

[REDACTED]

[REDACTED] *Id.* at 58:16-61:9; 99:3-101:10. His declaration relies on inadmissible hearsay from [REDACTED] that Entegris actively cloaked with privilege. *E.g., id.* at 51:9-52:2; 54:10-21; 61:11-67:22; 68:17-75:8; 163:7-16. Furthermore, he admitted [REDACTED]

[REDACTED] *id.* at 72:1-75:8, and [REDACTED]

id. at 25:11-16, yet he [REDACTED]

[REDACTED] *id.* at 73:16-22. Worse yet, Dr. Rivers's deposition confirmed that Entegris was [REDACTED]

[REDACTED] *Id.*, 159:22-161:15.

Respectfully submitted,

Dated: January 14, 2026

By: / Naveen Modi /
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Counsel for Patent Owner

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2026, I caused a true and correct copy of the foregoing Patent Owner's Supplemental Brief Regarding Lam's Status as an Unnamed Real Party-In-Interest to be served via email on Petitioner at the following addresses:

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