

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 RESPONSE BRIEF ON REAL PARTY IN INTEREST



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PETITIONER’S EXHIBIT LIST

Ex[No.]	Description of Documents
1001	U.S. Patent No. 11,673,903 (“’903 Patent”)
1002	Declaration of Dr. Gerard Parkin (“Parkin Decl.”)
1003	Declaration of Dr. Drew Hood (“Hood Decl.”)
1004	Prosecution File History for the ’903 Patent (“’903 Patent File History”)
1005	“Synthesis of The First Mono-t-Butyltin Element Compounds,” by D. Hänssgen et al. (“Hänssgen”)
1006	U.S. Patent Application No. 2016/0116839, entitled “Organometallic Solution Based High Resolution Patterning Compositions and Corresponding Method,” to Meyers et al. (“Meyers”)
1007	U.S. Patent Application No. 2011/0166268, entitled “High Purity Monoalkyltin Compounds and Uses Thereof,” to Deelman et al. (“Deelman”)
1008	Declaration of Sylvia D. Hall-Ellis, Ph.D. (“Hall-Ellis Decl.”)
1009	“Amino-derivatives of Metals and Metalloids. Part I. Preparation of Aminostannanes, Stannylamines, and Stannazanes,” by K. Jones and M.F. Lappert (“Jones”)
1010	U.S. Patent No. 11,697,660.
1011	Excerpt of Prosecution File History for U.S. Patent No. 11,697,660.
1012	<i>Inpria Corp. v. Lam Rsch. Corp.</i> , Case No. 1:22-cv-01359, Dkt. 199 (D. Del. Oct. 18, 2024) (Joint Claim Construction Brief)
1013	U.S. Patent Application No. 2022/0242888.
1014	U.S. Patent No. 6,517,901.

Ex[No.]	Description of Documents
1015	Caseri, Walter (2014). “Initial Organotin Chemistry.” Journal of Organometallic Chemistry. 751: 20–24.
1016	K. Jones and M.F.& Lappert. “Amino Derivatives of Metals and Metalloids.” Journal of Organometallic Chemistry, Vol. 3, pp. 295-307 (1965).
1017	Clark Shove Robinson, “The Elements of Fractional Distillation,” 1st Ed., McGraw-Hill (1992).
1018	U.S. Patent No. 10,642,153.
1019	Procedures for Synthesis of $i\text{PrSn}(\text{NMe}_2)_3$ developed by Dr. Parkin.
1020	Procedures for Synthesis of $t\text{BuSn}(\text{NEt}_2)_3$ developed by Dr. Parkin.
1021	M. Froneman, T. Modro and S. Vather, “Dialkylamidoderivatives of Sn(II) and Sn(IV) in Phosphorus Chemistry”.
1022	U.S. Patent Application Publication No. 2022/0064192 A1.
1023	<i>Inpria Corp. v. Lam Rsch. Corp.</i> , No. 1:22-cv-01359, Dkt. 499 (D. Del. Apr. 24, 2025) (Inpria’s Opening Brief ISO Motion for Preliminary Injunction)
1024	<i>Inpria Corp. v. Lam Rsch. Corp.</i> , No. 1:22-cv-01359, Dkt. 172 (D. Del. Sept. 10, 2024) (Second Amended Complaint)
1025	<i>Inpria Corp. v. Lam Rsch. Corp.</i> , No. 1:22-cv-01359, Dkt. 452 (D. Del. Apr. 16, 2025) (Lam’s Motion to Dismiss)
1026	<i>Inpria Corp. v. Lam Rsch. Corp.</i> , No. 1:22-cv-01359, Dkt. 508 (D. Del. Apr. 28, 2025) (Order Amending Case Schedule)
1027	<i>Inpria Corp. v. Lam Rsch. Corp.</i> , No. 1:22-cv-01359, Dkt. 522 (D. Del. May 6, 2025) (Order re: Case Narrowing)
1028	June 23, 2025 Email Correspondence between counsel for Inpria and counsel for Lam regarding “Inpria v. Lam – Asserted Claims.”
1029	<i>Inpria Corp. v. Lam Rsch. Corp.</i> , No. 1:22-cv-01359, Dkt. 635 (D. Del. Sept. 15, 2025) (Dismissal)
1030	Lam Research and JSR Corporation/Inpria Corporation Enter Cross-Licensing, Collaboration Agreement to Advance Semiconductor Manufacturing, available at https://investor.lamresearch.com/2025-09-15-Lam-Research-andJSR-Corporation-Inpria-Corporation-Enter-Cross-Licensing,-Collaboration-Agreement-to-Advance-SemiconductorManufacturing (last visited October 10, 2025)

[REDACTED]

This RPI dispute is resolved by the dispositive fact that Lam and Inpria months ago entered a cross-license and settlement agreement (“Settlement”) without involving (or even informing) Entegris. EX1030. That Settlement alone proves that Entegris had its own independent interests in filing this IPR and certainly is the only RPI now. Inpria’s silence about the Settlement speaks volumes.

The extensive evidence and un rebutted testimony of Entegris’s Senior Director, Dr. Joseph Rivers, also confirm Lam is not an RPI. The evidence shows that (i) Lam had no input into the IPR, (ii) Lam and Entegris did not coordinate on IPR filing or strategy, (iii) Entegris acted entirely of its own accord in the IPR; and (iv) Lam did not pay for/fund the IPR. Inpria, on the other hand, relies only on repeated mischaracterizations and conjecture, including (i) arguing that [REDACTED]

[REDACTED] *even though the patent issued in mid-2023*; (ii) [REDACTED]; (iii)

[REDACTED]

[REDACTED]; and (iv) [REDACTED]

[REDACTED].

On these facts, Entegris would have violated § 312(a) if it *had* named Lam an RPI,¹ and Lam is certainly not an RPI now, post-settlement.

¹ If Lam were somehow deemed an RPI, Entegris acted in good faith, and the Board should exercise discretion to allow amendment if required. *Mayne Pharma Int’l Pty. Ltd. v. Merck Sharp & Dohme Corp.*, 927 F.3d 1232, 1239-1240 (Fed. Cir. 2019).

[REDACTED]

I. LAM IS NOT A REAL PARTY IN INTEREST

The question here is not whether Entegris and Lam are in privity, but “whether [Lam] exercises [or could exercise] control over [Entegris’s] participation in [this] proceeding, or whether [Lam] is funding...or directing the proceeding.” *Uniloc 2017 LLC v. Facebook Inc.*, 989 F.3d 1018, 1027–28 (Fed. Cir. 2021). The answer is no.

A. Lam has now settled and cannot be an RPI

“The determination of whether a nonparty is a real party in interest or privy is made *as of the date of institution* of a proceeding...” *RØDE Microphones LLC. v. Zaxcom, Inc.*, IPR2025-00231, Paper 33 at 3 (Aug. 21, 2025); *Power Integrations, Inc. v. Semiconductor Components Indus.*, 926 F.3d 1306, 1314-15 (Fed. Cir. 2019). Lam has settled and signed a license with Inpria. EX1030. That Inpria argues that Lam retains an interest in this IPR while refusing to produce that Settlement borders on a violation of Rule 42.51(b)(1)(iii). Under the facts, Lam cannot be an RPI.

B. Lam Has Not Controlled, Funded, or Coordinated this Proceeding

Entegris did not coordinate with Lam about this IPR at any time. EX2046 ¶ 3. “Lam had no input in the decision to pursue this IPR or in the content, timing, scope or preparation of the IPR....” *Id.* ¶ 4. Nor did Lam fund the IPR. *Id.* ¶ 5. Inpria’s only response is to argue incorrectly that Dr. Rivers does not have personal knowledge of these facts. But he testified that: (1) [REDACTED]

[REDACTED] (2) [REDACTED]

[REDACTED] and (3) [REDACTED]

[REDACTED]

[REDACTED]. EX2055, 52:18-53:21, 68:10-14, 73:19-75:2, 76:1-22, 93:8-95:1, 96:8-19, 97:17-21.

Inpria also argues that Entegris’s decision to file this IPR before Lam’s bar date somehow shows that Lam is an RPI. Paper 28, 1. But as Entegris has already explained, it timed its IPR filing to avoid a potential privity dispute, and so that any Lam IPR did not preclude Entegris’s filing under then-applicable § 314(a) law. EX2045, 22:9-20; *see also Valve Corp. v. Elec. Scripting Prods., Inc.*, IPR2019-00062, Paper 11 at 8-9 (April 2, 2019) (precedential). Thus, the timing of the filing actually prevented prejudice to Inpria and confirms Entegris filed to preserve its own rights—not Lam’s. [REDACTED]

[REDACTED]

[REDACTED] EX2055, 159:22-160:16.

The documentary evidence also confirms that Entegris filed the petition solely to protect its interests. [REDACTED]

[REDACTED] (EX2053) demonstrates Entegris’s own interest in the petition and is a “valid reason[]” to conclude it is the sole RPI. *Assa Abloy Ab v. CPC Pat. Techs. Pty, Ltd.*, IPR2022-01006, 2024 WL 3799645, at *20-21 (Aug. 13, 2024).

In short, this IPR was not funded or controlled by Lam, did not circumvent a time bar, and Entegris did not file it to benefit Lam in any way (as shown by Entegris maintaining the IPR even after Lam settled). All these facts distinguish *Ventex v.*

[REDACTED]

Columbia Sportswear, on which Inpria relies. *Cf.*, IPR2017-00651, Paper 152 at 5, 8, 13 (Jan. 24, 2019) (precedential). With no evidence of Lam’s control over the IPR, “no evidence of joint funding, or even any evidence of substantial coordination between the parties as to their respective decisions to bring these proceedings, a finding that [Lam] is an RPI...would be improper.” *Uniloc*, 989 F.3d at 1029.

C. The Entegris-Lam Commercial Relationship Does Not Make Lam an RPI

In addition to being legally flawed, Inpria’s arguments rest on a mischaracterization of evidence. The facts confirm Lam is not an RPI.

[REDACTED]

[REDACTED] EX2046 ¶ 8; EX2055, 127:6-9. [REDACTED]

[REDACTED] EX2055, 111:13-112:16, 124:10-125:6; EX2046 ¶¶ 8-9, 12; EX2047 §§ 2.3, 8.2; EX2048 § 8.3. [REDACTED]

[REDACTED] EX2046 ¶ 8; EX2047 § 2.1; EX2048 § 2.7. Indeed, [REDACTED]

[REDACTED] EX 2048, § 2.7, and [REDACTED] EX2046 ¶ 13; EX2055, 150:16-21. And [REDACTED]

[REDACTED]

EX2047 § 2.1; EX2046 ¶ 10; EX2055, 135:19-136:21. [REDACTED]

[REDACTED] EX2055,

[REDACTED]

135:19-136:21; EX2046 ¶¶ 10, 13. This is not the kind of “specially structured” relationship that could plausibly make a customer an RPI. *Luminex Int’l Co., Ltd. v. Signify Holdings B.V.*, IPR2024-00101, 2025 WL 2347866, at *14 (Aug. 13, 2025).

No Indemnification: The parties’ [REDACTED], which the Board has held does not establish an RPI relationship “without something more.” *Assa Abloy AB et al. v. CPC Pat. Techs. Pty, Ltd.*, IPR2022-01093, Paper 20 at 22-25 (Feb. 2, 2023). Critically, Inpria does not dispute that [REDACTED] EX2046 ¶¶ 11, 13; EX2055, 143:10-15, 150:16-21. To the contrary, Lam, without notifying Entegris, settled and began a joint collaboration with Inpria in direct competition with Entegris. EX2046 ¶ 7. Such [REDACTED] shows that it is not the engine driving the IPR, *Assa Abloy*, Paper 20 at 23, consistent with the un rebutted testimony, EX2055, 158:8-12.

Common Interest: Finally, [REDACTED] [REDACTED]. But that is [REDACTED] [REDACTED]—which has now been settled *without Entegris*. EX2054, 1; *id.* § 12 ([REDACTED]). Moreover, [REDACTED] [REDACTED] does not establish an RPI in an IPR. *Petroleum Geo-Servs. Inc. v. WesternGeco LLC*, IPR2014-01475, 2015 WL 1276706, at *10 (Mar. 17, 2015) (a joint interest to invalidate a patent in district court does not indicate “the ability to control” or “directing or funding” an IPR).

Respectfully submitted,
BAKER BOTTS L.L.P.

January 16, 2026

Date

/ Eliot D. Williams /

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

CERTIFICATE OF COMPLIANCE

1. Pursuant to 37 C.F.R. § 42.24(d), the undersigned certifies that the foregoing Petitioner’s RESPONSIVE BRIEF ADDRESSING REAL-PARTY-IN-INTEREST complies with the type-volume or page limitations set forth in 37 C.F.R. § 42.24(a)(1)(v).

2. This Brief 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.

January 16, 2026
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 January 16, 2026, a complete and entire copy of the foregoing Petitioner's Responsive Brief Addressing Real-Party-In-Interest was served via email to Patent Owner at the following address(es):

PH-Entegris-Inpria-IPR@paulhastings.com

Respectfully submitted,
BAKER BOTTS L.L.P.

January 16, 2026
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