UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LAM RESEARCH CORP.,
Petitioner,

v.

INPRIA CORP.,
Patent Owner.

Case IPR2025-00309
Patent No. 11,537,048

DECLARATION OF ALISON P. PATITUCCI

I, Alison P. Patitucci, do hereby declare as follows:

1. I am an attorney with the law firm Morgan, Lewis & Bockius LLP, and I am one of the attorneys for Petitioner Lam Research Corp. in the above-captioned matter.

2. I am a member in good standing of the Bar of the State of Pennsylvania.

3. I am over the age of 18, competent, and if called to testify concerning the contents of this declaration, would do so truthfully.

4. I submit this declaration in accordance with 28 U.S.C. § 1746(2) and in support of the Petition for *Inter Partes* Review of U.S. Patent No. 11,537,048.

5. On November 20, 2024, I emailed Elsevier, which I understand to be an academic publishing company, regarding B. Cardineau et al., *Photolithographic properties of tin-oxo clusters using extreme ultraviolet light (13.5 nm)*, Microelectronic Engineering 127:44-50 (2014) ("Cardineau Article"), which is available at the following ScienceDirect URL: https://doi.org/10.1016/j.mee.2014.04.024. In my email to Elsevier, I (i) noted that the publication date of the Cardineau Article appeared on the website as September 5, 2014, (ii) stated my interest in determining the dates that the article was publicly available online and/or was published in paper format, and (iii) asked if Elsevier/ScienceDirect provides declarations or certifications regarding public availability of an article.

6. On November 22, 2024, an Elsevier Journal Manager stated the following in response: "The date '5 September 2014' refers to the publication date of the Volume 127 of the journal (Microelectronic Engineering). The date on which the article was made available online for the first time since its acceptance by the journal is '24 April 2014' and this is reflected by the 'Available online' date on ScienceDirect."

7. On November 22, 2024, I asked the Elsevier Journal Manager if Elsevier is able to provide a declaration regarding these dates. In response, on November 25, 2024, the Elsevier Journal Manager stated: "Elsevier is unable to provide any such declaration because the date is clearly mentioned in the online ScienceDirect version and its corresponding PDF. Hence, the date has already been declared by Elsevier and a separate document cannot be provided for the same."

8. A true and correct copy of my email correspondence with the Elsevier Journal Manager as discussed herein is submitted as Exhibit 1017 to the Petition.

9. A search for citations to the Cardineau Article on Google Scholar reveals citations by the following articles with 2015 publication dates:

- R. Del Re, *Molecular organometallic resists of tin and tellurium*, Legacy Theses & Dissertations (2009 - 2024), 1370 (Jan. 1, 2015) (EX1011);
- J. Son, et al., *Acid-Stable Peroxoniobophosphate Clusters To Make Patterned Films*, Chemistry - A European Journal, 21(18) (Apr. 27, 2015) (EX1012);

- J. Jiang, *Organic Inorganic Photoresist And Laser Induced Heating Process For Next Generation Lithography* (July 2015) (EX1013);
- R Del Re, et al., *Low-line edge roughness extreme ultraviolet photoresists of organotin carboxylates*, Journal of Micro/Nanolithography, MEMS, and MOEMS, Vol. 14, Issue 4, 043506 (Nov. 9, 2015) (EX1014); and
- R. Del Re, et al., *Low-LER Tin Carboxylate Photoresists using EUV, Extreme Ultraviolet (EUV) Lithography VI* (2015) (EX1015).

10. A true and correct copy of search results for citations to the Cardineau Article on Google Scholar in articles with 2015 publication dates is submitted as Exhibit 1016 to the Petition.

I declare under that all statements made herein of my own knowledge are true, and that all statements made on information and belief are believed to be true, and that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Executed on December 13, 2024

Respectfully Submitted,

/ Alison P. Patitucci /
Alison P. Patitucci (Reg. No. 75,370)