UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY LTD.,

Petitioner

v.

ADVANCED INTEGRATED CIRCUIT PROCESS LLC,

Patent Owner

Case IPR2025-00682
Patent 8,198,686

DECLARATION OF KEMPER DIEHL

I, Kemper Diehl, declare as follows:

1. I am over 21 years of age and competent to make this declaration. I make this declaration based on my own personal knowledge.

2. I am an attorney at Susman Godfrey L.L.P., and I am counsel of record for Patent Owner Advanced Integrated Circuit Process LLC ("Patent Owner") in *Advanced Integrated Circuit Process LLC v. Taiwan Semiconductor Manufacturing Co. Ltd.*, 2:24-cv-623 (the "TSMC Lawsuit") and *Advanced Integrated Circuit Process LLC v. United Microelectronics Corp.*, 2:24-cv-730 (the "UMC Lawsuit"), both currently pending in the Eastern District of Texas (collectively, the "Lawsuits").

3. The parties have served 29 interrogatories in the TSMC Lawsuit, including 22 served by Patent Owner and seven served by Taiwan Semiconductor Manufacturing Co. Ltd. ("TSMC").

4. The parties have served 16 interrogatories in the UMC Lawsuit, including 16 served by Patent Owner and none served by United Microelectronics Corp. ("UMC").

5. The deposition of TSMC witness Elissa Haas takes place on June 18, 2025. In addition, depositions of three additional TSMC witnesses (Jason Lin, Mick Hsieh, and Nick Tsai) have been scheduled to take place on June 27, July 3, and July 18, 2025, respectively.

6. Pursuant to the Protective Order in the Lawsuits, Patent Owner designated a reviewer to have access to sensitive technical information (*e.g.*, source code) of TSMC and UMC. This reviewer has made at least six visits to review defendants' sensitive technical information.

7. TSMC served its invalidity contentions on May 1, 2025. Those contentions included, in part, a 290-page disclosure document. Exhibit 2016 is a true and correct copy of this disclosure document.

8. For each patent asserted in the Lawsuits, TSMC's invalidity contentions also included multiple Exhibits, each containing claim charts comparing a single primary reference (or, for some Exhibits, multiple secondary references) to the asserted claims of that particular patent. In total, there were 103 of these Exhibits to TSMC's invalidity contentions, containing more than 5,000 pages.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 17, 2025, in Seattle, Washington.

Kemper P. Diehl

Kemper Diehl