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 No. 8,198,686

DECLARATION OF MICHAEL SHEN

I, Michael Shen, declare as follows:

1. I am Chief Counsel, Patent Litigation, at Taiwan Semiconductor Manufacturing Company Ltd. ("TSMC"). I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.

2. TSMC's outside counsel sent a letter to the outside counsel of patent owner Advanced Integrated Circuit Process LLC ("AICP") on December 16, 2024 to explore a potential resolution of the litigation that would obviate the need to file IPR petitions.

3. AICP's outside counsel responded on February 6, 2025.

4. AICP's principals came to Taiwan to meet TSMC principals including me on March 12, 2025.

5. After this in-person meeting, the parties' respective principals then held six more teleconferences to continue the discussions. These teleconferences took place on March 20, 2025; March 24, 2025; March 28, 2025; March 31, 2025; April 3, 2025; and April 10, 2025.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on July 17, 2025 in Hsinchu, Taiwan.

Michael Shen