

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING CO. LTD.,

Petitioner

v.

ADVANCED INTEGRATED CIRCUIT PROCESS LLC,

Patent Owner

Case IPR2025-01302

Patent 8,884,373

PATENT OWNER'S OBJECTIONS TO PETITIONER'S EVIDENCE

Mail Stop "PATENT BOARD"

Patent Trial and Appeal Board

U.S. Patent and Trademark Office

P.O. Box 1450

Alexandria, VA 22313-1450

I. Introduction

Under the Federal Rules of Evidence (“FRE”) and 37 C.F.R. § 42.64, Advanced Integrated Circuit Process LLC (“Patent Owner”) timely objects to evidence submitted by Taiwan Semiconductor Manufacturing Co. Ltd. (“Petitioner”) in this proceeding. Patent Owner may move to exclude the challenged exhibits under 37 C.F.R. § 42.64(c) unless Petitioner timely cures the objections identified by Patent Owner below.

II. Specific Objections

A. Exhibit 1003 – Declaration of Dr. Jack Lee in Support of IPR Petition

Patent Owner objects to this exhibit under FRE 701-705 and 802 because Dr. Jack Lee has not been made available for deposition, and Patent Owner reserves the right to raise any additional objections that become apparent from his deposition at that time if he is made available for deposition.

B. Exhibit 1005 – Translated Excerpts from File History of Japanese Patent No. 5857225 to Sato et al. (“JP ‘225 patent”) (Japanese counterpart of the ‘373 Patent)

Patent Owner objects to this exhibit under 37 CFR § 42.63(b), FRE 602, FRE 701-705, and FRE 802 to the extent the purported translation lacks an affidavit attesting to the accuracy of the translation from a person having personal knowledge of the matter and expertise to certify accuracy of the translation, and because John Andres has not been made available for deposition, and Patent Owner reserves the right to raise any additional objections that become apparent from his deposition at that time if he is made available for deposition.

C. Exhibit 1009 – Certified Translation of Japanese Patent No. 9181194 to Sumi

Patent Owner objects to this exhibit under 37 CFR § 42.63(b), FRE 602, FRE 701-705, and FRE 802 to the extent the purported translation lacks an affidavit attesting to the accuracy of the translation from a person having personal knowledge of the matter and expertise to certify accuracy of the translation, and because Steve Ni has not been made available for deposition, and Patent Owner reserves the right to raise any additional objections that become apparent from his deposition at that time if he is made available for deposition.

D. Exhibit 1011 – Plummer, J., et al., “Silicon VLSI Technology: Fundamentals, Practice and Modeling” (Prentice Hall 2000)

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions.

E. Exhibit 1012 – Weste, “CMOS VLSI Design: A Circuits and Systems Perspective” (Third Edition, 2005)

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions.

F. Exhibit 1013 – Wolf, “Silicon Processing for the VLSI Era, Volume 4 – Deep Submicron Process Technology” (2002)

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions.

G. Exhibit 1014 – Van Zant, “Microchip Fabrication” (Fifth Edition, 2004)

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions.

H. Exhibit 1015 – “International Technology Roadmap for Semiconductors: Process Integration, Devices, and Structures” (2007 Edition)

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions.

I. Exhibit 1017 – Sze, “Semiconductor Devices: Physics and Technology” (2nd Edition) (2002)

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the

proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions.

J. Exhibit 1019 – TSMC’s stipulation regarding U.S. Patent Nos. 8,884,373, 8,329,572, 7,439,623, and 7,632,751

Patent Owner objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding.

K. Exhibit 1020 – Translation of Written Opinion of International Search Authority

Patent Owner objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding. Furthermore, Patent Owner objects to this exhibit under 37 CFR § 42.63(b), FRE 602, and FRE 802 to the extent the purported translation lacks an affidavit attesting to the accuracy of the translation from a person having personal knowledge of the matter and expertise to certify accuracy of the translation

L. Exhibit 1021 – A Review of TSMC 28 nm Process Technology

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions.

Patent Owner objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding.

M. Exhibit 1022 – Disruptive Technology: TSMC 22ULL eMRAM

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions. Patent Owner also objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding.

N. Exhibit 1023 – 28HPC+_22ULP - Taiwan Semiconductor Manufacturing Company Limited

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions. Patent Owner also objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding.

O. Exhibit 1024 – Excerpts from TSMC Invalidity Contentions in Civil Action No. 2:25-cv-324 (E.D. Tex.) (Sep. 24, 2025) (Highly Confidential – Attorneys’ Eyes Only)

Patent Owner objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding. Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions. Patent Owner also objects to this exhibit under FRE

106 because it is heavily excerpted. Fairness requires that the document as a whole (including any omitted and redacted parts) be considered—not just the portions Petitioner felt would be most helpful to its case.

P. Exhibit 1041 – Patent Assignment Record from Nuvoton Technology Corp. Japan to Advanced Integrated Circuit Process LLC, Reel: 068118 Frame: 0314-0317, United States Patent and Trademark Office (July 30, 2024)

Patent Owner objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding. Patent Owner also objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay.

Q. Exhibit 1042 – United States District Courts – National Judicial Caseload Profile, 12-Month Period Ending Mar. 31, 2025, U.S. Courts (2025)

Patent Owner objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding. Patent Owner also objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay.

R. Exhibit 1043 – Summary of Judge Gilstrap Patent Trials Between October 22, 2024 and October 22, 2025

Patent Owner objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding. Patent Owner also objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence

sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay.

S. Exhibit 1044 – Docket for 2:23-cv-00274 (E.D. Tex.)

Patent Owner objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding. Patent Owner also objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay.

T. Exhibit 1045 – Docket for 2:23-cv-00379 (E.D. Tex.)

Patent Owner objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding. Patent Owner also objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay.

U. Exhibit 1046 – Docket for 2:24-cv-00034 (E.D. Tex.)

Patent Owner objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding. Patent Owner also objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay.

V. Exhibit 1047 – Docket for 2:24-cv-00047 (E.D. Tex.)

Patent Owner objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding. Patent Owner also objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay.

W. Exhibit 1048 – Docket for 2:24-cv-00049 (E.D. Tex.)

Patent Owner objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding. Patent Owner also objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay.

X. Exhibit 1049 – Jeremy Bowman, Nasdaq, This 1 Number May Ensure TSMC’s Market Dominance, The Motley Fool (Aug. 17, 2024)

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions. Patent Owner also objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding.

Y. Exhibit 1050 – CNBC Transcript: United States Commerce Secretary Howard Lutnick Speaks with CNBC’s Brian Sullivan on “The Exchange” Today, CNBC (Apr. 29. 2025)

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions. Patent Owner also objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding.

Z. Exhibit 1051 – Trump on China Putting - America First (Robert C. O’Brien editor)

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions. Patent Owner also objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding.

AA. Exhibit 1052 – Remarks: Donald Trump Announces an Economic Investment in the United States - March 3, 2025

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions. Patent Owner also objects to

this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding.

BB. Exhibit 1053 – Speech: Donald Trump Addresses an Republican Dinner in Washington - April 8, 2025

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions. Patent Owner also objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding.

CC. Exhibit 1054 – Microchip USA, How Military Tensions Are Driving the Next Semiconductor Chip Race (July 16, 2025)

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions. Patent Owner also objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding.

DD. Exhibit 1055 – Another Historic Investment Secured Under President Trump, Articles, The White House (Mar. 3, 2025)

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner

has not identified any applicable hearsay exceptions. Patent Owner also objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding.

EE. Exhibit 1056 – Sujai Shivakumar and Charles Wessner, Semiconductors and National Defense: What Are the Stakes?, Center for Strategic International Studies (June 8, 2022)

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions. Patent Owner also objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding.

FF. Exhibit 1057 – U.S., Taiwan, and Semiconductors: A Critical Supply Chain Partnership, Final Report, Project 2049 Institute (US-Taiwan Business Counsel June 21, 2023)

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions. Patent Owner also objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding.

GG. Exhibit 1058 – Eric Lee, How Taiwan Underwrites the US Defense Industrial Complex, The Diplomat (Nov. 9, 2021)

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions. Patent Owner also objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding.

HH. Exhibit 1060 – Virtex 7 XQ FPGAs

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions. Patent Owner also objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding.

II. Exhibit 1061 – Xilinx, 7-Series Defense-Grade FPGAs: All Programmable Defense-Grade Devices with High Performance, Low Power, and 4th Generation Security (2016)

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions. Patent Owner also objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding.

JJ. Exhibit 1062 – Bruce Fienberg, Xilinx Ships First Artix-7 FPGAs – Raising the Performance Bar for Portable and Small Form Factor Applications at the ‘Edge’ (July 17, 2012)

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions. Patent Owner also objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding.

KK. Exhibit 1063 – Silvia Pellegrino, What is TSMC?, Tech Monitor (Jan. 2, 2023)

Patent Owner objects to this exhibit (a) under FRE 901 because Petitioner has not produced any evidence sufficient to support a finding that the item is what the proponent claims it is, and (b) under FRE 802 as containing hearsay, and Petitioner has not identified any applicable hearsay exceptions. Patent Owner also objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding.

LL. Exhibit 1064 – Patent Owner’s Response and Objections to Petitioner’s First Request for Production of Documents (Contains Material Marked Highly Confidential – Attorneys’ Eyes Only)

Patent Owner objects to this exhibit under FRE 402 because Petitioner has failed to demonstrate how it is relevant to the proceeding.

Dated: January 26, 2026

Respectfully submitted,

By: /Russell A. Chorush /
Russell A. Chorush (Reg. No. 55,869)
Attorney for Patent Owner
Advanced Integrated Circuit Process, LLC

CERTIFICATE OF SERVICE

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), copies of the foregoing **PATENT OWNER'S OBJECTIONS TO PETITIONER'S EVIDENCE** were served to the following counsel of record for Petitioner addressed as follows:

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Dated: January 26, 2026

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