

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INFINEON TECHNOLOGIES AMERICAS CORP.,
Petitioner,

v.

MOSAID TECHNOLOGIES INC.,
Patent Owner.

Case IPR2025-01487
Patent 9,972,381

**PETITIONER'S AUTHORIZED REPLY TO
PATENT OWNER'S PRELIMINARY RESPONSE**

I. INTRODUCTION

MOSAID argues that Infineon’s petition and district court claim construction positions are inconsistent regarding the ’381 patent’s “control signal” and “clock output signal” terms. POPR, 2–9. But there is no inconsistency. The petition’s obviousness grounds do not turn on the claim constructions Infineon seeks in district court for purposes of adjudicating infringement. Thus, Infineon’s petition was correct: “Petitioner submits that no claim terms require a formal construction for purposes of addressing the grounds in this Petition.” Pet., 2.

II. ARGUMENT

Timing. MOSAID’s critique that the petition does not explicitly address Infineon’s district court claim construction positions ignores the timeline of events. POPR, 2–9. MOSAID fails to mention that claim construction briefing at the district court had not yet begun when Infineon filed the petition on August 29, 2025. Infineon had only reserved a list of terms by then, not crystallized its constructions, and the parties did not exchange constructions until September 11, 2025.

The Control Signal Term. Infineon’s claim construction brief explains why the plain meaning requires that the control signal’s transition is *contemporaneous* with “a beginning of command data being received.” EX2007, 12–13 (discussing claims 1, 17). Although MOSAID complains that the petition fails to disclose this position to the Board or reconcile it, Infineon merely makes explicit what a POSITA

would understand the plain claim language to mean. POPR, 3, 5–9. In short, there is no distinction to reconcile. “Indeed, a construction of contemporaneity is the only one that gives ‘beginning’ operative effect in the claims.” EX2007, 13.

Tracking Infineon’s view of the plain meaning, the petition discusses how Grundy shows a transition of a command signal that indicates a beginning of command data in Figure 6. Pet., 33–34. As the petition quotes, Grundy’s “memory controller 151 *simultaneously* asserts a valid signal 174₁ on the valid line 154 (and a command signal 176₁ on command line 156 if a command is being transmitted) and drives a first value, A, onto the bus 158, both in response to an edge [177] of the clock signal 172₁.” Pet., 33 (citing Ex. 1005 (Grundy) at [0047]) (emphasis added). MOSAID seemingly faults Infineon for not using the word “*contemporaneous*” in the petition. But this form-over-substance argument fails. As everyone knows, events that occur simultaneously also occur contemporaneously.

Grundy’s Figure 6 clearly shows the simultaneous—and therefore contemporaneous—transition of the control signal and the beginning of command data. Pet., 33–34. Yet MOSAID points to an “apparent gap” in the petition’s annotations as purportedly “suggest[ing] that these events are not exactly contemporaneous.” POPR, 8. Nonsense. The annotations merely point out relevant parts of Grundy’s figure and obviously do not change the illustrated simultaneous signal timing. MOSAID’s contrary assertion is baseless.

The Clock Output Signal Term. Infineon’s claim construction brief

contends that “clock output signal” is “a periodic signal that synchronizes system operations.” Ex 2007, 16. Here again, Infineon’s construction merely reflects what clock signals do (synchronize) and what the claims plainly require (e.g., cl. 4: “a clock output port configured to transmit a clock output signal synchronized with the output data...”). Pet., 53–57. Accordingly, the petition discusses that “Grundy’s clock output signal (e.g., clock out) is *synchronized* with the output data” and how “the next device...would rely on the [output] data to be *synchronized* with the clock signal.” Pet., 55–56 (emphasis added); *see also id.*, 54 (citing Grundy’s Fig. 6, which shows a periodic clock signal). MOSAID fails to explain why Grundy’s clock output signal is not a “synchronous periodic signal.” POPR, 3, 9.

Stipulation. To ensure consistency between this IPR and the district court case, Infineon stipulates that it will: (1) submit this reply brief to the district court for consideration during *Markman*; and (2) submit to the Board and abide in this IPR by any constructions reached by the district court. *See Caption Health, Inc. v. University of British Columbia*, IPR2025-01422, Paper 15 at 3 (Director Dec. 18, 2025) (“Petitioner’s stipulation, therefore, resolves any potential inconsistency[.]”).

Respectfully submitted,

Dated: January 12, 2026

/Kenneth Wayne Darby Jr./

Kenneth Wayne Darby Jr., Reg. No. 65,068

David M. Hoffman, Reg. No. 54,174

Nicholas W. Stephens, Reg. No. 74,320

John-Paul Fryckman, Reg. No. 62,880

Fish & Richardson P.C.

60 South Sixth Street, Suite 3200

Minneapolis, MN 55402

T: 202-783-5070

F: 877-769-7945

Counsel for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 CFR §42.6(e)(4), the undersigned certifies that on January 12, 2026, a complete and entire copy of this Petitioner's Authorized Reply to Patent Owner's Preliminary Response was provided via email, to the Patent Owner by serving the email correspondence addresses of record as follows:

Kenneth J. Weatherwax
Parham Hendifar
Nathan Lowenstein
Colette Woo
Dennis J. Courtney
Jamie McDole

LOWENSTEIN & WEATHERWAX LLP
weatherwax@lowensteinweatherwax.com
hendifar@lowensteinweatherwax.com
MOSAID_IPRs@lowensteinweatherwax.com

/Diana Bradley/
Diana Bradley
Fish & Richardson P.C.
60 South Sixth Street, Suite 3200
Minneapolis, MN 55402
Tel: 202-783-5070
Fax: 877-769-7945
bradley@fr.com