

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 IPR2025-01489
Patent 7,349,448

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

I. INTRODUCTION

MOSAID's preliminary response merely repeats its already-considered complaint that Infineon's petition and district court claim construction positions are inconsistent. POPR, 2–5. MOSAID raised the same baseless criticism in its rejected discretionary denial request. Req., 17–20; Paper 21. There is no inconsistency. The petition's obviousness grounds do not turn on the claim constructions Infineon seeks in district court for adjudicating infringement. Thus, Infineon's petition was correct: "No formal claim constructions are necessary [in this IPR] because...the prior art teaches each limitation under any reasonable construction." Pet., 8.

II. ARGUMENT

Timing. MOSAID's first critique that the petition does not explicitly address Infineon's district court claim construction positions ignores the timeline of events. POPR, 2–15. 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.

Means-Plus-Function Constructions. Infineon's district court position that the "logic" terms in claim 8 should be construed under § 112 ¶ 6 merely proposes a plain-meaning interpretation of the claimed function and a structure corresponding to "the various [distributed multiplexor logic] stages (elements 204/205/206) as

shown in [the '448 patent's] Figure 4.” EX2007, 25–28. The petition addresses both. Indeed, with one exception, distributed stages of multiplexor logic using *tri-state drivers* is exactly what Infineon relies on when mapping the Pixley-Watanabe combination to the various “logic” terms recited in the '448 patent's claims. *E.g.*, Pet., 8–23, 27–35, 48–50. MOSAID's contrary suggestion ignores the petition. POPR, 12–13 (cl. 4).

The exception is in claim 8, and for good reason. There, unlike other claims, the “logic associated with a *first* data connection” does *not* require functionality to *select* between data words—it must merely “transmit a first data word.” EX1001, 13:59–14:14. Data word *selection* is only required for claim 8's “logic associated with a *second* data connection” and “logic associated with a *third* data connection.” *Id.* As Infineon's claim construction brief explains, “[i]t is through these *tri-state drivers* that the stage ‘effective[ly] *selects* which signal drives its connection’ and which word...is selected.” EX2007, 27 (quoting EX1001, 7:49–62).

Accordingly, MOSAID's focus on whether Pixley's set of flip-flops is a tri-state driver misses the point. POPR, 7–12. The corresponding structure of claim 8's first-data-connection logic does not require a tri-state driver because there is no claimed data-word-selection function. *See Micro Chem., Inc. v. Great Plains Chem. Co.*, 194 F.3d 1250, 1258 (Fed. Cir. 1999) (noting that § 112, ¶ 6 does not “permit incorporation of structure from the written description beyond that necessary to

perform the claimed function”). For claim 8’s first-data-connection logic, the corresponding structure is simply a stage of circuitry within a distributed multiplexor that transmits a data word, and MOSAID does not dispute that Pixley’s set of flip-flops is exactly that. *Compare* Pet., 44–46, *with* POPR, 7–12.

Indefiniteness. As Infineon explained in the discretionary phase, claim 8’s indefiniteness problem is that “*the* first selected signal set” lacks antecedent basis. EX2007, 29–30; Opp., 19. But that does not prevent mapping to a Pixley-Watanabe combination that lands at the heart of the claim. *Id.*

According to MOSAID, “*the* first selected signal set” means “the data word selected in the previous logic stage”; according to Infineon, “*the* first selected signal set” could also mean “the set of select signals.” As shown in Infineon’s petition, Pixley-Watanabe covers both, which MOSAID does not deny. *See* Pet., 49–50 (explaining that the “logic associated with a third data connection” receives “the set of signals of the data word selected by tri-state MUX 116” *and* the “select signal of input terminal 128 and the select signal output by inverter 118”).

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*; (2) submit to the Board and abide in this IPR by any constructions reached by the district court; and (3) withdraw claim 8 from this proceeding if deemed indefinite by the district court.

Respectfully submitted,

Dated: January 12, 2026

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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:

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