

Filed on behalf of: Monolithic Power Systems, Inc.

Entered: March 26, 2026

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MONOLITHIC POWER SYSTEMS, INC.,

Petitioner,

v.

REED SEMICONDUCTOR CORP.,

Patent Owner.

Case IPR2026-00165
U.S. Patent No. 7,960,955

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

EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 7,960,955 (the “’955 Patent”)
1002	File History of the ’955 Patent
1003	Declaration of Joseph McAlexander
1004	U.S. Pat. No. 7,015,544 (“Lotfi”)
1005	U.S. Pat. No. 5,528,132 (“Doluca”)
1006	U.S. Pat. No. 6,271,652 (“Burstein”)
1007	U.S. Patent No. 5,428,286 (“Kha”)
1008	U.S. Patent No. 4,675,797 (“Vinciarelli”)
1009	CV of Joseph McAlexander
1010	Monolithic Power Systems, Inc. 2024 Annual Report on Form 10-K
1011	Patent Assignment, Reel/Frame 072492/0637
1012	Complaint for Patent Infringement – Case No. 6:25-cv-00449-ADA-DNM
1013	MPS NB670 Datasheet, Rev. 1.02, August 27, 2014 (obtained from https://www.monolithicpower.com/en/documentview/productdocument/index/version/2/document_type/Datasheet/lang/en/sku/NB670/document_id/6379/)
1014	MPS MPQ4420A Datasheet, Rev. 1.0, December 18, 2015 (obtained from https://www.monolithicpower.com/en/documentview/productdocument/index/version/2/document_type/Datasheet/lang/en/sku/MPQ4420AGJ-Z/document_id/994/)
1015	MPS NB680 Datasheet, Rev. 1.03, July 27, 2017 (obtained from https://www.monolithicpower.com/en/documentview/)

Exhibit No.	Description
	productdocument/index/version/2/document_type/Datasheet/lang/en/sku/NB680/document_id/4031/)
1016	MPS MP2225 Datasheet, Rev. 1.01, April 13, 2016 (obtained from https://www.monolithicpower.com/en/documentview/productdocument/index/version/2/document_type/Datasheet/lang/en/sku/MP2225GJ-Z/document_id/922/)
1017	LegalMetric Time to Trial Report for Texas Western District Court Patent Cases (January 2010 to August 2025)
1018	Appendix A, Reed Infringement Contentions
1019	Email from M. Bombach to D. Heske et. al. Re: SERVICE: No. 6:25-cv-00449 WDTX - Defendant Monolithic Power Systems, Inc.'s Proposed Claim Terms for Construction, dated March 12, 2026
1020	ADA Standing Order Governing Proceedings (OGP) Patent Cases (March 5, 2025)
1021	Email from M. Bombach To: D. Heske et. al. Re: SERVICE: No. 6:25-cv-00449 WDTX - Defendant Monolithic Power Systems, Inc.'s Proposed Claim Terms for Construction dated March 8, 2026

Pursuant to the Board's March 23, 2026 email authorization (Ex. 3001), Petitioner respectfully submits this Reply to Patent Owner's Preliminary Response.

The POPR argues that "Petitioner advances inconsistent claim construction positions in the Petition as compared to the positions that Petitioner is actively advancing in co-pending parallel litigation." POPR at 1. That is incorrect. MPS has not advanced any "inconsistent" claim construction positions. The *only* term at issue in the co-pending litigation is the preamble of claim 1, which Petitioner asserts should be given "its *plain and ordinary meaning* where the preamble is limiting." Ex. 1019 (emphasis added). That is entirely consistent with the positions Petitioner advances in the Petition: Petitioner identified how the claim 1 preamble is disclosed and rendered obvious by the prior art in accordance with its plain and ordinary meaning. Pet. at 13 ("Lotfi discloses and renders obvious 1[PRE]."), *Id.* at 35 ("The Doluca-Burstein combination discloses and renders obvious [PRE]."). Patent Owner's arguments to the contrary are incorrect.

First, Patent Owner asserts that MPS contends "numerous terms of the challenged claims are indefinite under 35 U.S.C. § 112." POPR at 1. Patent Owner is wrong. MPS is not arguing that any term of any claim is indefinite in the co-pending litigation. Patent Owner's misguided argument is based on the preliminary invalidity contentions Petitioner served in the district court, as required under the Standing Order Governing Proceedings for Patent Cases (OGP). Ex. 1020. At the

claim construction stage, however, MPS did not identify any terms as indefinite, which is required by the Western District of Texas for maintaining indefiniteness arguments. Ex. 1020 at 13 (“The parties shall disclose any extrinsic evidence, including the identity of any expert witness they may rely upon with respect to claim construction or *indefiniteness*.”); *see id.* (“Defendant files Opening claim construction brief, *including any arguments that any claim terms are indefinite*.”) (emphasis added); *Finalrod IP, LLC v. John Crane, Inc.*, Case No. 7:15-cv-00097, 2019 WL 4061703, at *6-7 (W.D. Tex. May 30, 2019) (finding defendants “waived their argument that the ‘compressive force’ limitations were indefinite by failing to raise this issue during the case’s claim construction phase”).

Second, Patent Owner asserts that MPS proposes that two “claim terms need to be construed by the Court”—the preamble and “power supply voltage”—“showing that it seeks to rely on narrower, or at the very least different, interpretations of claim terms in the District Court than it is relying upon in its Petition.” POPR at 1, 6. That is also incorrect. MPS is not and has not proposed any construction for the term “power supply voltage.” At most, MPS identified “power supply voltage” as a *potential* term for construction as required under the district court’s patent local rules. Ex. 1020 at 12. But MPS did not propose a construction for that term on the deadline for proposed construction in the district court. Ex. 1019. For the avoidance of doubt, MPS has also affirmatively withdrawn

the term as a term for construction. Ex. 1021. The only claim construction issue in the district court case is whether the preamble of claim 1 is limiting under its plain meaning, which is fully consistent with the Petition as discussed above. Tellingly, Patent Owner did not identify any actual conflicts in its identification of terms for construction. POPR at 6.

Both *Revvo* and *Cambridge Mobile* are easily distinguishable. In *Revvo*, the Petition applied the Patent Owner's district court construction, which the Petitioner itself did not adopt in the district court. *Revvo Techs., Inc. v. Cerebrum Sensor Techs., Inc.*, IPR2025-00632, Paper 20 at 2 (Squires Nov. 3, 2025) (precedential). There, the Petitioner indisputably and strategically “proposed different constructions for the claim terms in the district court litigation” than it applied in the IPR. Here, however, MPS's lone claim construction position is exactly how the Petition applied the preamble—as limiting under its plain meaning. Similarly, in *Cambridge Mobile*, the Petitioner argued in district court that certain terms were governed by §112(f) as means-plus-function terms, yet the Petition did not apply §112(f) to any terms. *Cambridge Mobile Telematics, Inc. v. Sfara, Inc.*, IPR2024-00952, Paper 12 at 6-7 (Dec. 13, 2024) (informative). No §112(f) issues exist here.

MPS's claim construction positions in district court are fully consistent with the Petition in this proceeding. Patent Owner's accusations of inconsistency mischaracterize the district court procedures and are incorrect in any event.

Respectfully submitted,

Dated: March 26, 2026

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 26th day of March, 2026, a true and correct copy of the foregoing **Petitioner's Reply to Patent Owner's Preliminary Response** was served by electronic mail on Patent Owner's lead and backup counsel at the following email addresses:

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