

Paper No. _____

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTELLECTUAL VENTURES MANAGEMENT, LLC
Petitioner

v.

Patent of XILINX, INC.
Patent Owner

Case IPR2012-00019
Patent 8,062,968

Title: INTERPOSER FOR REDISTRIBUTING SIGNALS

**PATENT OWNER'S FIRST MOTION TO AMEND
BY XILINX UNDER 37 C.F.R. § 42.121**

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INTRODUCTION

Patent Owner Xilinx, Inc. (“Xilinx”) moves to amend the claims of U.S. Patent No. 8,062,968 (“the ’968 Patent”) under 35 U.S.C. § 316(a)(9) and 37 C.F.R. § 42.121. A listing of the proposed claim amendments is attached as Exhibit XLNX-2009. The Board should enter the proposed amendments because they obviate the grounds of unpatentability at issue in this *inter partes* review of the ’968 Patent.

I. Support in Specification for Proposed Amendments

A. Proposed Claim 16

Where claim 1 recites a single interposing structure, proposed claim 16 recites “a plurality of tiled interposing structures,” where “tiled interposing structures” refers to a regular pattern of side by side interposing structures. (XLNX-2008, ¶ 13.) Support for this amendment can be found in Fig. 8 accompanied by this description, which describes creating a larger single interposing structure from a plurality of smaller tiled interposing structures:

In some embodiments, several smaller interposers are used to mount a larger packaged IC to a PCB. When several smaller interposers are used, they can individually expand and/or contract over several smaller areas, rather than experiencing a larger expansion and/or contraction over a single larger area.

Thus, the structure can withstand greater variations in temperature without failure.

FIG. 8 shows one such embodiment. In the pictured embodiment, the smaller interposers ("tiles") are separately soldered to the packaged IC and to the lands of the PCB. In other embodiments (not shown), the tiles are combined together to form a single interposer device prior to mounting. (IVM-1001 at 9:61-10:5; *see also* XLNX-2008, ¶¶ 14-17.)

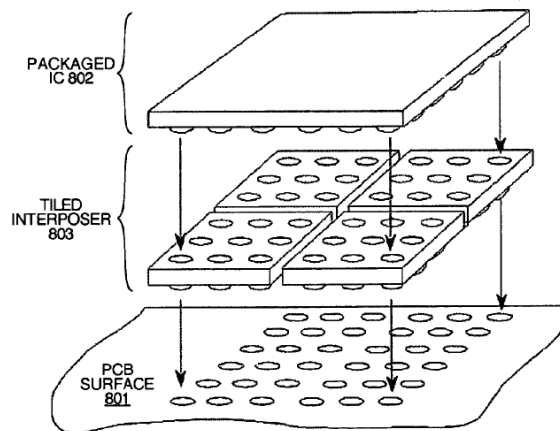


FIG. 8

B. Proposed claim 17

Proposed claim 17 replaces original claim 2. In addition to referring to the plural “interposing structures” of claim 16 as discussed above, proposed claim 17 replaces the bypass current and capacitor limitations with a requirement of “holding the interposing structures together using an elastomer.” Support for this additional amendment can be found in the specification:

In one embodiment, an elastomer is used to hold the tiles together, thus forming the single interposer device. The

elastomer also serves to absorb mechanical stresses from thermal expansion and/or contraction.

(IVM-1001 at 10:6-9.)

C. Proposed claim 18

Proposed claim 18 replaces original claim 3. In addition to referring to the plural “interposing structures” of claim 16 as discussed above, proposed claim 18 now requires a collective major surface for the interposing structures.

Accordingly, proposed claim 18 is supported for at least the same reasons as proposed claim 16.

D. Proposed claim 19

Proposed claim 19 replaces original claim 4. In addition to referring to the plural “interposing structures” of claim 16 as discussed above, proposed claim 19 replaces the “no transistor and no PN junction” limitations with a requirement that “at least one of the interposing structures comprises a first conductive layer corresponding to a first capacitor for a first power supply and a second conductive layer corresponding to a second capacitor for a second power supply different from the first power supply.” Support for this additional amendment can be found in the specification:

ICs are often manufactured using more than one power supply and/or more than one ground. For example, an IC can use a different power supply (VCC) for each quadrant of the

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