

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.
Petitioner

v.

PROMOS TECHNOLOGIES, INC.
Patent Owner

U.S. Patent No. 6,195,302

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 6,195,302**

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LIST OF EXHIBITS

- Ex. 1001 U.S. Patent No. 6,195,302
- Ex. 1002 Declaration of R. Jacob Baker, Ph.D., P.E.
- Ex. 1003 Prosecution History of U.S. Patent No. 6,195,302
- Ex. 1004 U.S. Patent No. 5,140,199 to *Seo* (“*Seo*”)
- Ex. 1005 UK Patent GB2246005B to *Min et al.* (“*Min*”)
- Ex. 1006 European Patent EP 0597231 to Hardee (“*Hardee EP*”)
- Ex. 1007 Schuster *et al.*, “A 15-ns CMOS 64K RAM,” *IEEE J. of Solid-State Circuits*, Vol. SC-21, No. 5, Oct. 1986, pp.704-12 (“*Schuster*”)
- Ex. 1008 Taur *et al.*, Fundamentals of Modern VLSI Devices, 1998 (“*Taur*”)
- Ex. 1009 U.S. Patent No. 4,980,799 to Tobita (“*Tobita*”)
- Ex. 1010 Curriculum Vitae of R. Jacob Baker, Ph.D., P.E.
- Ex. 1011 Meng *et al.*, “A Clock-Free Chip Set for High-Sampling Rate Adaptive Filters,” *Journal of VLSI Signal Processing*, Vol. 1, No. 4, 1990, pp. 345-65 (“*Meng*”)
- Ex. 1012 Amrutur *et al.*, “A Replica Technique for Wordline and Sense Control in Low-Power SRAM’s,” *IEEE Journal of Solid-State Circuits*, Vol. 33, No. 8, Aug. 1998, pp. 1208-19 (“*Amrutur*”)

I. INTRODUCTION

Samsung Electronics Co., Ltd. (“Petitioner”) requests *inter partes* review (“IPR”) of claims 1-6, 10-12, and 14-18 (“the challenged claims”) of U.S. Patent No. 6,195,302 (“the ’302 patent”) (Ex. 1001), which is currently assigned to ProMOS Technologies, Inc. (“Patent Owner”) according to USPTO records. For the reasons set forth below, the challenged claims should be found unpatentable and canceled.

II. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8

Real Parties-in-Interest: Petitioner identifies the following as the real parties-in-interest: Samsung Electronics Co., Ltd.; Samsung Electronics America, Inc.; Samsung Semiconductor, Inc.; and Samsung Austin Semiconductor, LLC.

Related Matters: Patent Owner has asserted the ’302 patent against Petitioner in *ProMOS Technologies, Inc. v. Samsung Electronics Co., Ltd., et al.*, No. 1:15-cv-00898-SLR-SRF (D. Del.). Petitioner is concurrently filing a petition challenging claims 1-6 and 10-12 of the ’302 patent. Petitioner respectfully requests that the Board institute each petition, as each presents distinct and non-redundant grounds. Patent Owner has also asserted U.S. Patent Nos. 6,849,897 (“the ’897 patent”), 6,020,259 (“the ’259 patent”), 6,699,789 (“the ’789 patent”), 6,088,270 (“the ’270 patent”), and 5,761,112 (“the ’112 patent”) in this action. Petitioner is also concurrently filing IPR petitions on the ’897, ’259, ’789, ’270,

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