

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS CO., LTD.  
Petitioner,

v.

PROMOS TECHNOLOGIES, INC.,  
Patent Owner

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CASE IPR2017-01412 (Patent 6,069,507)  
CASE IPR2017-01413 (Patent 6,069,507)

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Record of Oral Hearing  
Held: June 21, 2018

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Before JAMESON LEE, KEVIN F. TURNER, and JOHN A. HUDALLA,  
*Administrative Patent Judges.*

CASE IPR2017-01412 (Patent 6,069,507)

CASE IPR2017-01413 (Patent 6,069,507)

APPEARANCES:

ON BEHALF OF THE PETITIONER:

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The above-entitled matter came on for hearing on June 21, 2018, commencing at 1:03 p.m., at the U.S. Patent and Trademark Office, Madison Building, 600 Dulany Street, Alexandria, Virginia 22314.

1 PROCEEDINGS

2 JUDGE LEE: Good afternoon. Please be seated. We'll  
3 wait a moment until Judge Turner comes on the screen from our San  
4 Jose office.

5 Good afternoon. This is the oral argument -- a  
6 consolidated oral argument for two cases: IPR2017-01412 and  
7 2017-01413. Both sides -- each side would get 45 minutes of  
8 argument time, and the petitioner may reserve some of that for  
9 rebuttal.

10 Let's now go to introduction of counsel, beginning with  
11 Petitioner, followed by Patent Owner, please.

12 MR. ANDERSON: Good afternoon, Your Honor. Paul  
13 Anderson on behalf of Petitioner Samsung. With me is Chetan  
14 Bansal.

15 JUDGE LEE: Anderson?

16 MR. ANDERSON: Anderson.

17 JUDGE LEE: I see. Thank you.

18 MR. JONES: Good afternoon, Your Honors. Kevin Jones  
19 from the TechKnowledge Law Group, and lead counsel Greg Kaufman,  
20 also of TechKnowledge --

21 JUDGE LEE: Thank you.

22 MR. JONES: -- on behalf of Patent Owner, ProMOS.

23 JUDGE LEE: Any time you're ready, Mr. Anderson, you can  
24 begin.

25 MR. ANDERSON: Can I approach with a copy of the slides?

CASE IPR2017-01412 (Patent 6,069,507)

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1 JUDGE LEE: Thank you.

2 MR. ANDERSON: If I could, I'd like to reserve 15  
3 minutes for rebuttal.

4 JUDGE LEE: Okay. I'll give you a two-minute warning.

5 MR. ANDERSON: Appreciate it.

6 Good afternoon, Your Honors. Good morning, Judge  
7 Turner. I'm here representing Petitioner Samsung in the two IPR  
8 proceedings concerning patent 6,069,507. The Board initially  
9 instituted proceedings on with respect to claims 13 and 15 in both  
10 of the IPR proceedings. Following the *SAS* decision by the Supreme  
11 Court, the decision was modified to further include claims 10 and  
12 11.

13 If we could turn to slide 2, please. There are three  
14 grounds at issue in the two petitions or the two IPRs. In the  
15 01412 proceeding, the two grounds are claims 10 and 11, as  
16 obvious over Donnelly and Iwamoto; claims 13 and 15, as  
17 anticipated by Jefferson. In 01413, it's all of claims 10, 11, 13  
18 and 15 as anticipated by Kim.

19 With respect to all of these grounds, Patent Owner does  
20 not dispute that all of the claims are either anticipated or  
21 rendered obvious when the plain and ordinary meaning of the plain  
22 terms is applied. The dispute here is over the construction of  
23 two claim terms: One term in claim 10 and one term in claim 13.

24 I'm going to start with claim 13 before moving on to  
25 claim 10 later. If you could turn to slide 3, please.

1           Claim 13 is a method claim that includes two steps. The  
2 first step is determining whether a feedback clock signal in a DLL  
3 follows within a 180-degree phase difference behind an input clock  
4 signal. The second step in claim 13 is selecting a switch  
5 position according to that determining step or selecting a switch  
6 position includes selecting a first switch position when the  
7 feedback clock signal is found to follow behind the input clock  
8 signal within 180 degrees.

9           If we could turn to slide 4. Slide 4 shows figure 2 of  
10 the '507 patent, and it's a little bit small, but if you look to  
11 the upper right of figure 2, you'll see a phase detector 12, and  
12 that's the first phase detector in the circuit, figure 2. On the  
13 bottom left, there's another phase detector. The second phase  
14 detector 30, and phase detector 30 receives an input clock signal,  
15 CKI from the top, and a feedback clock signal, CKF from the  
16 bottom.

17           Second phase detector 30 makes a determination as to  
18 whether or not the feedback clock signal, CKF, follows within 180  
19 degrees behind CKI. And based on that determination, it controls  
20 the switch, 28, where switch 28 has two switch positions: Position  
21 1 selects the non-inverted version of the input clock signal to  
22 provide that to the delay line whereas switch position 2 selects  
23 an inverted version of that input clock signal. And that inverted  
24 version is generated by inverter 26.

25           If we could jump ahead to slide 13 really quickly.

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