

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 IPR2017-01415  
Patent 6,208,574

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**PATENT OWNER PROMOS TECHNOLOGIES, INC.'S RESPONSE TO  
PETITION FOR *INTER PARTES* REVIEW OF  
UNITED STATES PATENT NO. 6,208,574**

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## I. INTRODUCTION

Patent Owner ProMOS Technologies, Inc. hereby responds to Samsung's Petition for *Inter Partes* Review seeking cancellation of claims 4-18, and 21-27 of U.S. Patent No. 6,208,574 (Ex. 1001).

The Board should find that all challenged claims are not invalid. For claims 4-10, 14-17, and 21-27, Samsung has combined Inoue with Min and Hamade, and for claims 11-13 and 18 Samsung has combined Inoue with Min, Hamade, and Ogawa. The Board should reject Samsung's proffered combination of the Inoue/Min system with both Hamade and Ogawa, because each of Hamade and Ogawa are incompatible with the goals and structure disclosed by Inoue. Inoue is directed to a sense amplifier circuit designed to consume less power. Hamade describes a structure that achieves the opposite result – it achieves greater speed by adding a four-transistor drive circuit for each bit line pair, and in doing so consumes greater power. Similarly, Ogawa describes a circuit that would increase power consumption by using an additional decoder which would worsen the very problem that Inoue sought to overcome. A person of ordinary skill in the art would not combine the references in the way suggested.

In addition to its invalidity arguments, Samsung proposed a construction of the terms “local data write driver circuit” and “local column read amplifier” requiring these structures to be “associated with only one latch circuit.” The Board

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