

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY LTD.,
Petitioner,

v.

ADVANCED INTEGRATED CIRCUIT PROCESS LLC,
Patent Owner.

Case IPR2025-00683
Patent No. 8,907,425

**PETITIONER'S MOTION REQUESTING
ACCEPTANCE OF
SUBMISSION OF EXHIBITS**

Petitioner Taiwan Semiconductor Manufacturing Company Ltd. submits this Motion Requesting Acceptance of Submission of Exhibits. This Motion has been authorized in the Board's email of July 22 and is being made pursuant to the Board's instructions for alternative filing methods when P-TACTS is unavailable.¹ Patent Owner does not oppose.

Petitioner's Opposition to Patent Owner's Discretionary Denial Request ("Opposition") was due July 18, 2025. Petitioner timely filed the Opposition and Updated Exhibit List via P-TACTS on July 18, 2025. Due to maintenance impacting P-TACTS, Petitioner was unable to file Exhibits 1053-1058, 1060-1084, 1086-1092, 1094-1102, 1105, 1106, 1110-1113, 1115-1126, 1129-1131, and 1133-1149 via P-TACTS until July 19, 2025. Filing via P-TACTS was completed within one hour after P-TACTS again became operational.

Being unable to access P-TACTS, Petitioner complied with the Board's alternative method for filing.² Specifically, Petitioner (1) served its Opposition to Patent Owner's Discretionary Denial Request, Updated Exhibit List, and all exhibits

¹ Available at [https://www.uspto.gov/patents/apply/filing-online/filing-documents-during-outage#PTAB%20Patent%20Trial%20and%20Case%20Tracking%20System%20\(P-TACTS\)](https://www.uspto.gov/patents/apply/filing-online/filing-documents-during-outage#PTAB%20Patent%20Trial%20and%20Case%20Tracking%20System%20(P-TACTS)).

² *Id.*

via email at 11:05 pm ET on July 18, 2025, before the deadline for filing; (2) notified the Board of service by email at Trials@uspto.gov, copying Patent Owner’s counsel at 11:23 pm ET; (3) filed the outstanding exhibits once P-TACTS became available on July 19, 2025, between approximately 12:01 a.m. and 1:00 a.m. ET; and (4) files this motion for acceptance of the submissions. *See* Ex-1150.

Having complied with the requirements of alternative service, the Board’s website states that “[t]he ... document will be accorded the date on the certificate of service as the identified filing date,” here July 18, 2025.³ The Board has granted such relief under similar circumstances. *See, e.g., Arthrex, Inc. v. P Tech, LLC*, IPR2022-00786, Paper 13, at 3 (Mar. 7, 2023); *Nitro Fluids, L.L.C. v. Cameron Int’l Corp.*, IPR2020-00691, Paper 11, at 4 (June 30, 2022); *Huawei Device Co., Ltd. v. Maxell, Ltd.*, IPR2018-00209, Paper 17, at 3 (Aug. 30, 2018); *Microsoft Corp. v. Smart Skins LLC*, IPR2016-00404, Paper 11, at 3 (Aug. 2, 2016).

Petitioner accordingly requests that the Board accept the submission of Petitioner’s Exhibits 1053-1058, 1060-1084, 1086-1092, 1094-1102, 1105, 1106, 1110-1113, 1115-1126, 1129-1131, and 1133-1149 and accord those exhibits a filing date of July 18, 2025—the date on the certificate of service.

³ *Id.*

Dated: July 22, 2025

/ J. Preston Long /

J. Preston Long, Ph.D., Reg. No. 65,125
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Lead Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Petitioner's Motion Requesting Acceptance of Submission of Exhibits** was served on July 22, 2025, via e-mail directed to counsel of record for the Patent Owner at the following:

Russell A. Chorush
Michael F. Heim
Christopher L. Limbacher
Lily R. Glick
Kyle Friesen
HEIM, PAYNE & CHORUSH, LLP
609 Main Street, Suite 3200
Houston, TX 77002
rchorush@hpcllp.com
mheim@hpcllp.com
climbacher@hpcllp.com
lglick@hpcllp.com
kfriesen@hpcllp.com
aicppllit@hpcllp.com

Patent Owner has consented to electronic service via email.

Dated: July 22, 2025

/ William Esper /
William Esper
Senior Litigation Paralegal
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, LLP