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**Tim Tingkang Xia, Ph.D.**  
D 404.870.4698  
Tim.xia@troutman.com

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**VIA E-MAIL**

([rchorush@hpcllp.com](mailto:rchorush@hpcllp.com); [mheim@hpcllp.com](mailto:mheim@hpcllp.com); [climbacher@hpcllp.com](mailto:climbacher@hpcllp.com); [lclick@hpcllp.com](mailto:lclick@hpcllp.com);  
[kfriesen@hpcllp.com](mailto:kfriesen@hpcllp.com); [aicppllit@hpcllp.com](mailto:aicppllit@hpcllp.com); [jnelson@susmangodfrey.com](mailto:jnelson@susmangodfrey.com);  
[jtruelove@mckoolsmith.com](mailto:jtruelove@mckoolsmith.com))

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

Justin A. Nelson  
SUSMAN GODFREY L.L.P.  
1000 Louisiana Street, Suite 5100  
Houston, TX 77002

Jennifer Leigh Truelove  
MCKOOL SMITH, P.C. - Marshall  
104 East Houston Street, Suite 300  
Marshall, TX 75670

**Re: *United Microelectronics Corp. and UMC Group (USA) v. Advanced Integrated Circuit Process LLC*, IPR2025-01093 for US Patent No. 8,587,076;  
*Advanced Integrated Circuit Process LLC v. United Microelectronics Corp.*, Civil Action No. 2:24-cv-00730 (E.D. Tex.) (Lead Case);  
*Advanced Integrated Circuit Process LLC v. Taiwan Semiconductor Manufacturing Co. Ltd.*, Civil Action No. 2:24-cv-00623 (E.D. Tex.) (Consolidated Member Case)  
TPL Ref: 632329.000006**

Dear Counsel:

We write regarding a petition for *inter partes* review (“IPR”) filed June 6, 2025 (Paper 1) with the United States Patent and Trademark Office, Patent Trial and Appeal Board (“PTAB”) in IPR2025-01093 (the “Petition”) to challenge claims 1-3, 6-8, and 10-13 (the “Challenged Claims”) of U.S. Patent No. 8,587,076. The table below lists the grounds asserted by United

Microelectronics Corporation and UMC Group (USA) (collectively, “Petitioner”) in the Petition, along with the Challenged Claims against which the grounds are asserted. Petitioner hereby stipulates that in the event (a) the PTAB institutes an IPR in response to the Petition, and does not subsequently vacate institution or (b) in response to the petition filed by Taiwan Semiconductor Manufacturing Co. Ltd. (“TSMC”) against U.S. Patent No. 8,587,076 (IPR2025-00831), the PTAB institutes an IPR and the instituted IPR is not subsequently vacated or terminated before Final Written Decision, Petitioner will not pursue in the subject parallel litigation in U.S. District Court (the “Litigation”) invalidity of the Challenged Claims based on:

1. the grounds listed in the below table against the corresponding claims listed in the below table for those grounds, as identified in the Petition,
2. any other grounds that could have reasonably been raised before the PTAB in IPR2025-01093 (i.e., any ground that could have reasonably been raised under pre-AIA §102 or §103 on the basis of prior art patent(s) or prior art printed publication(s)), or
3. any other invalidity ground under pre-AIA §102 or §103 involving any type of legally recognized prior art, including patent, printed publication, or system art.

Ground	Basis	Claims	Reference(s) in IPR2025-01093
I	§ 103	1-3, 7-8, 10-13	U.S. Patent Application Publication No. 2002/0063299 A1 (“Kamata”) (Ex. 1027)
II	§ 103	6	U.S. Patent Application Publication No. 2002/0063299 A1 (“Kamata”) (Ex. 1027) and Sim, J.H., et al., “Effects of ALD HfO <sub>2</sub> thickness on charge trapping and mobility,” <i>Microelectronic Engineering</i> , Vol. 80, pp. 218-221, June 17, 2005 (“Sim”) (Ex. 1024)
III	§ 103	1-3, 7-8, 10-13	U.S. Patent Application Publication No. 2006/0091432 A1 (“Guha”) (Ex. 1028)
IV	§ 103	6	U.S. Patent Application Publication No. 2006/0091432 A1 (“Guha”) (Ex. 1028) and Sim, J.H., et al., “Effects of ALD HfO <sub>2</sub> thickness on charge trapping and mobility,” <i>Microelectronic Engineering</i> , Vol. 80, pp. 218-221, June 17, 2005 (“Sim”) (Ex. 1024)
V	§ 103	1-3, 7-8, 10-13	U.S. Patent Application Publication No. 2003/0025135 S1 (“Matsumoto”) (Ex. 1009) and U.S. Patent No. 6,504,214 (“Yu”) (Ex. 1048)

Ground	Basis	Claims	Reference(s) in IPR2025-01093
VI	§ 103	6	U.S. Patent Application Publication No. 2003/0025135 S1 (“Matsumoto”) (Ex. 1009) and U.S. Patent No. 6,504,214 (“Yu”) (Ex. 1048) and Sim, J.H., et al., “Effects of ALD HfO <sub>2</sub> thickness on charge trapping and mobility,” <i>Microelectronic Engineering</i> , Vol. 80, pp. 218-221, June 17, 2005 (“Sim”) (Ex. 1024)
VII	§ 103	1	U.S. Patent Application Publication No. 2003/0025135 S1 (“Matsumoto”) (Ex. 1009) and Koyama, M., et al., “Effects of Nitrogen in HfSiON Gate Dielectric on the Electrical and Thermal Characteristics,” <i>Digest of International Electron Devices Meeting</i> , pp. 849-852, Dec. 8-11, 2002 (“Koyama”) (Ex. 1029)
VIII	§ 103	1, 11, 12	U.S. Patent Application Publication No. 2003/0025135 S1 (“Matsumoto”) (Ex. 1009) and U.S. Patent Application Publication No. 2005/0051856 A1 (“Ono”) (Ex. 1013)

For the sake of clarity, and to avoid any doubt, if the PTAB declines to institute the grounds identified in the above table for whatever reason, Petitioner reserves the right to assert such grounds and all other available arguments for invalidity in the Litigation, including without limitation, under §112.

If institution of the Petition is granted, Petitioner further stipulates that it will submit a parallel stipulation in the Litigation as well as seek a stay of that Litigation pending resolution of the instituted IPR.

Best regards,

*/s/ Tim Tingkang Xia*

Tim Tingkang Xia (Petitioner Counsel IPR2025-01053)  
Emma A. Bennett (Petitioner Counsel IPR2025-01053 and Defendant Counsel)  
Mark Hannemann (Defendant Counsel of Record)  
Ryan E. Dornberger (Defendant Counsel of Record)

cc: Counsel of Record via email

troutman.com

**Tim Tingkang Xia, Ph.D.**  
 D 404.870.4698  
 Tim.xia@troutman.com

<b>Plaintiff Counsel of Record in Lead 2:24-cv-00730</b>	<b>Defendant Counsel of Record in Lead 2:24-cv-00730</b>	<b>Consolidated Defendant Counsel of Record in 2:24-cv-00623</b>
<b>Justin Adatto Nelson</b> (LEAD ATTORNEY) jnelson@susmangodfrey.com	<b>Mark Hannemann</b> (LEAD ATTORNEY) mark.hannemann@troutman.com	<b>Jennifer Leigh Truelove</b> (LEAD ATTORNEY) jtruelove@mckoolsmith.com
<b>Andrew Jamal Nassar</b> anassar@susmangodfrey.com	<b>Emma Anne Bennett</b> emma.bennett@troutman.com	<b>Anthony Van Nguyen</b> nguyen@fr.com
<b>Bianca Rey</b> brey@susmangodfrey.com	<b>Ryan E. Dornberger</b> ryan.dornberger@troutman.com	<b>Benjamin Christoff</b> christoff@fr.com
<b>Claire Abernathy Henry</b> claire@millerfairhenry.com		<b>Christian A Chu</b> chu@fr.com
<b>Ian M. Gore</b> igore@susmangodfrey.com		<b>Conrad Gosen</b> conradgosen@quinnemanuel.com
<b>Kalpana Srinivasan</b> ksrinivasan@susmangodfrey.com		<b>Gyushik Jang</b> kevinjang@quinnemanuel.com
<b>Ravi Paul Singh Bhalla</b> rbhalla@susmangodfrey.com		<b>Iman Lordgooei</b> imanlordgooei@quinnemanuel.com
<b>Andrea Leigh Fair</b> andrea@millerfairhenry.com		<b>Jacqueline T Moran</b> jtmoran@fr.com
		<b>James Lee Huguenin-Love</b> huguenin-love@fr.com
		<b>James E Quigley</b> jqigley@mckoolsmith.com
		<b>Jodie W Cheng</b> jodiecheng@quinnemanuel.com
		<b>Karolina Jesien</b> jesien@fr.com
		<b>Karrie E. Washenfe Wheatley</b> wheatley@fr.com
		<b>Kevin K. Su</b> su@fr.com
		<b>Michael J McKeon</b> mckeon@fr.com
		<b>Sean S. Pak</b> seanpak@quinnemanuel.com