

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY LTD.,

Petitioner

v.

ADVANCED INTEGRATED CIRCUIT PROCESS LLC,

Patent Owner

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IPR2025-01076 (Patent 7,579,227)

IPR2025-01079 (Patent 7,923,764)

IPR2025-01092 (Patent 8,253,180)

IPR2025-01093 (Patent 8,587,076)

IPR2025-01053 (Patent 8,796,779)

IPR2025-01090 (Patent 8,907,425)

IPR2025-01091 (Patent 8,198,686)

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**DECLARATION OF RAVI BHALLA**

I, Ravi Bhalla, declare as follows:

1. I am over 21 years of age and competent to make this declaration. I make this declaration based on my own personal knowledge.

2. I am an attorney at Susman Godfrey L.L.P., and I am counsel of record for Patent Owner Advanced Integrated Circuit Process LLC (“Patent Owner”) in *Advanced Integrated Circuit Process LLC v. Taiwan Semiconductor Manufacturing Co. Ltd.*, 2:24-cv-623 (the “TSMC Lawsuit”) and *Advanced Integrated Circuit Process LLC v. United Microelectronics Corp.*, 2:24-cv-730 (the “UMC Lawsuit”), both currently pending in the Eastern District of Texas (collectively, the “Lawsuits”).

3. The parties have served 34 interrogatories in the TSMC Lawsuit, including 22 served by Patent Owner and 12 served by Taiwan Semiconductor Manufacturing Co. Ltd. (“TSMC”).

4. The parties have served 23 interrogatories in the UMC Lawsuit, including 16 served by Patent Owner and 7 served by United Microelectronics Corp. (“UMC”).

5. The depositions of two TSMC witnesses (Elissa Haas and Jason Lin) took place on June 18 and June 27, respectively. In addition, the depositions of TSMC witnesses Mick Hsieh and Nick Tsai were noticed.

6. Pursuant to the Protective Order in the Lawsuits, Patent Owner

designated multiple reviewers to have access to sensitive technical information (e.g., source code) of TSMC and UMC. These reviewers have made at least 11 visits to review TSMC's sensitive technical information and one review of UMC's sensitive technical information.

7. TSMC served its invalidity contentions on May 1, 2025. Those contentions included, in part, a 290-page disclosure document. Exhibit 2016 is a true and correct copy of this disclosure document.

8. For each patent asserted in the Lawsuits, TSMC's invalidity contentions also included multiple Exhibits, each containing claim charts comparing a single primary reference (or, for some Exhibits, multiple secondary references) to the asserted claims of that particular patent. In total, there were 103 of these Exhibits to TSMC's invalidity contentions, containing more than 6,000 pages.

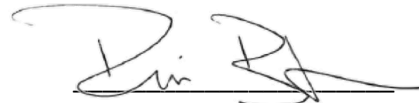
9. UMC served its invalidity contentions on May 1, 2025. Those contentions included, in part, a 67-page disclosure document that incorporates by reference TSMC's invalidity contentions. Exhibit 2017 is a true and correct copy of this disclosure document.

10. For each patent asserted in the Lawsuits, UMC's invalidity contentions also included multiple Exhibits, each containing claim charts comparing a single primary reference (or, for some Exhibits, multiple secondary

references) to the asserted claims of that particular patent. In total, there were 44 of these Exhibits to UMC's invalidity contentions, containing more than 5,300 pages.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 20, 2025, in New York, New York.



Ravi Bhalla