

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

IPR2025-01210 (Patent 7,632,751)

IPR2025-01211 (Patent 7,439,623)

IPR2025-01212 (Patent 7,439,623)

IPR2025-01302 (Patent 8,884,373)

IPR2025-01305 (Patent 8,329,572)

DECLARATION OF KEMPER DIEHL

I, Kemper Diehl, 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.*, 2:25-cv-00324 (the “Lawsuit”), currently pending in the Eastern District of Texas.

3. TSMC served its invalidity contentions on September 24, 2025. Those contentions included, in part, a 158-page disclosure document.

4. For each patent asserted in the Lawsuit, TSMC’s invalidity contentions included multiple exhibits comprising claim charts comparing various alleged prior art references to the asserted claims of that particular patent.

5. TSMC’s invalidity contentions contain 15 claim charts corresponding to United States Patent No. 7,632,751. These claim charts total 1,163 pages.

6. TSMC’s invalidity contentions contain 15 claim charts corresponding to United States Patent No. 7,439,623. These claim charts total 1,205 pages.

7. TSMC’s invalidity contentions contain 13 claim charts corresponding to United States Patent No. 8,884,373. These claim charts total 998 pages.

8. TSMC’s invalidity contentions contain 17 claim charts corresponding

to United States Patent No. 8,329,572. These claim charts total 1,362 pages.

9. In total, TSMC's invalidity contentions (including the disclosure document and appended exhibits) span 4,886 pages.

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

Executed on September 24, 2025, in Seattle Washington.



Kemper Diehl