

Exhibit 4

Appendix A1

Defendants and Counterclaimants' Invalidation Contentions

Advanced Micro Devices, Inc., et al., v. Samsung Electronics Co., Ltd., et al., Case No. 3:08-CV-0986-SI

U.S. Patent No. 5,545,592 Invalidation Chart: U.S. Patent No. 5,975,912 (“Hillman ’912 patent”)

All asserted claims are anticipated by the Hillman ‘912 patent and/or are rendered obvious by it, either alone or in combination with other prior art described below and/or listed in Section I of Defendants’ and Counterclaimants’ Preliminary Invalidation Contentions and/or through modifications described below. Nothing in this invalidation chart should be construed as signifying or suggesting Defendants and Counterclaimants’ adoption of or acquiescence in any claim scope and/or claim construction positions taken by Plaintiffs and Counterdefendants in this litigation.

U.S. Patent No. 5,545,592	
<u>Claim 1</u>	
Claim limitation	Hillman ‘912 patent
1. A method for forming a contact to a semiconductor body, said method comprising the steps of:	Assuming that the preamble is a claim limitation, the Hillman ‘912 patent discloses this limitation. <i>See, e.g.</i> , col. 1, lines 11-21 (“In the formation of integrated circuits (IC’s), thin films containing metal elements are often deposited upon the surface of a substrate, such as a semiconductor wafer. Thin films are deposited to provide conducting and ohmic contacts in the circuits and between the various devices of an IC. For example, a desired thin film might be applied to the exposed surface of a contact or via hole on a semiconductor wafer, with the film passing through the insulative layers on the wafer to provide plugs of conductive material for the purpose of making interconnections across the insulating layers.”); col. 3, lines 23-35 (“Accordingly, it is an object of the present invention to provide a method of chemical vapor deposition of films at low temperatures, generally less than 500° C. Further, it is an object of the present invention to provide for the chemical vapor deposition of different films in the same apparatus. These films would include titanium, tungsten and/or titanium nitride. Further, it is an object of the present invention to provide for a method of depositing these films onto a variety of substrates such as silicon, aluminum and tungsten while, at the same time, avoiding many of the problems typically associated with multiple-layer deposition such as creation of shorts and/or production of undesirable high-resistance films.”).
forming a metal silicide layer on said body;	The Hillman ‘912 patent discloses this limitation. <i>See, e.g.</i> , col. 15, lines 29-31 (“An integrated contact metalization process can be used by first depositing titanium onto a silicon surface by PECVD. This will form a layer of titanium silicide.”).
exposing said metal silicide layer to nitrogen ionized in a plasma, thereby converting a portion of said metal silicide layer to a first metal nitride	The Hillman ‘912 patent discloses this limitation. <i>See, e.g.</i> , col. 15, lines 31-33 (“After the titanium deposition an ammonia plasma anneal is performed to provide an upper layer of nitrified silicide titanium.”); <i>see also</i> col. 3, lines 47-58.

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U.S. Patent No. 5,545,592	
layer;	<i>See also</i> Nitrogen Plasma Treatment of Metal Silicide References, cited at Appendix A4.
depositing a layer of a second metal nitride over said metal silicide layer, such that said second metal nitride layer overlays and engages said first metal nitride layer; and	The Hillman '912 patent discloses this limitation. <i>See, e.g.</i> , col. 15, lines 33-35 ("Finally, a titanium nitride layer can be deposited by PECVD, again in the same reaction chamber."); col. 15, lines 48-49 ("The titanium nitride layer is needed as an adhesion layer for forming tungsten via plugs.").
depositing a layer of a second metal over said second metal nitride layer.	The Hillman '912 patent discloses this limitation. <i>See, e.g.</i> , col. 15, lines 35-37 ("Finally, following the deposition of the titanium nitride, aluminum or tungsten metal can be sputter deposited.").
<u>Claim 4</u>	
Claim limitation	Hillman '912 patent
4. The method of claim 1, wherein said metal silicide is titanium silicide, and wherein the second metal nitride is titanium nitride.	The Hillman '912 patent discloses this limitation. <i>See, e.g.</i> , col. 15, lines 29-31 ("An integrated contact metalization process can be used by first depositing titanium onto a silicon surface by PECVD. This will form a layer of titanium silicide."); col. 15, lines 33-35 ("Finally, a titanium nitride layer can be deposited by PECVD, again in the same reaction chamber."); col. 15, lines 48-49 ("The titanium nitride layer is needed as an adhesion layer for forming tungsten via plugs.").