STC.UNM v. Intel Corporation
Doc. 159 Att. 1

Exhibit A

[Excerpts from] Bruce Smith Deposition Testimony

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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEW MEXICO
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5 STC.UNM,)
Plaintiff,)
6) Case No.: 10-CV-01077-RV-DWS.
vs.) Volume 1
7) Pages 1 to 211
INTEL CORPORATION,)
8 Defendant.)
__________________________)
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13 DEPOSITION OF BRUCE SMITH
14 Wednesday, September 14, 2011
15
16
17 Reported by:
18 HEIDI BELTON, CSR, RPR, CRR, CCRR
19 Certified Shorthand Reporter No. 12885
20 ____
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25

16:47:58 1 THE WITNESS: I'm afraid I haven't looked into
16:48:00 2 the impact of doing a damascene process with photoresist
16:48:08 3 still on the wafer. We can step through that if you
16:48:14 4 like.
16:48:14 5 BY MR. STADHEIM:
16:48:14 6 Q. What do you need to do; just think about it?
16:48:17 7 Or what do you need to do?
16:48:19 8 **A. Your question was could you perform a**
16:48:22 9 **damascene process with photoresist still on the wafer.**
16:48:25 10 Q. Yeah.
16:48:25 11 **A. Again photoresist --**
16:48:26 12 MR. HUR: Object to the form. Outside the
16:48:27 13 scope. Incomplete hypothetical.
16:48:29 14 THE WITNESS: Photoresist --
16:48:30 15 MR. HUR: Go ahead. Sorry.
16:48:32 16 THE WITNESS: Photoresist on the wafer would
16:48:33 17 certainly be a part, but the polishing process wouldn't
16:48:38 18 have the photoresist in place.
16:48:39 19 BY MR. STADHEIM:
16:48:40 20 Q. I'm sorry. Would you repeat that?
16:48:42 21 **A. The polishing process would --**
16:48:44 22 Q. No. I mean the whole thing, what you said.
16:48:46 23 **A. A damascene process, part of that processing**
16:48:49 24 **sequence would include photoresist. So part of the**
16:48:53 25 **damascene process photoresist would be in place, but to**

16:48:57 1 **complete that damascene process you wouldn't do the**
16:48:59 2 **polishing with the photoresist in place.**
16:49:03 3 Q. So you couldn't complete the -- let me be more
16:49:18 4 precise. Look at claim 6 of the patent, please. And
16:50:01 5 I'm referring to lines 42 to 44. And I'll read it.
16:50:08 6 "Transferring said first pattern and second pattern into
16:50:14 7 said substrate using a combined mask including parts of
16:50:19 8 said first mask layer and said second photoresist."
16:50:24 9 If you were to do that procedure using a
16:50:30 10 damascene process, could you do it while there was still
16:50:36 11 photoresist on the wafer?
16:50:39 12 MR. HUR: Object to the form. Vague.
16:50:41 13 Incomplete hypothetical. Outside the scope.
16:50:59 14 THE WITNESS: This damascene process involves
16:51:05 15 etching. If the etching step of the damascene
16:51:09 16 process -- let me say it that way. The etching step of
16:51:12 17 the damascene process could certainly be carried out
16:51:15 18 using the transfer step that you just read, which would
16:51:19 19 have the photoresist in place.
16:51:24 20 BY MR. STADHEIM:
16:51:24 21 Q. Could you electroplate copper with resist
16:51:28 22 still on the wafer?
16:51:32 23 MR. HUR: Objection; incomplete hypothetical.
16:51:36 24 Outside the scope. Object to the form.
16:51:39 25 THE WITNESS: There are certain parts of the