

# Exhibit B

**From:** Brian Ferrall [mailto:BFerrall@KVN.com]  
**Sent:** Tuesday, November 15, 2011 10:58 AM  
**To:** Steve Pedersen  
**Cc:** Ben Hur; Paven Malhotra; Patricia Bazianos  
**Subject:** RE: STC.UNM v. Intel -- "transferring" constructions

Steve,

STC's proposal to revise the claim construction calendar and terms after the completion of briefing is unacceptable. Pursuant to a defined Court schedule, the parties have exchanged terms and constructions, submitted briefs and conducted depositions for over six months. The substantial time and effort put into this process was necessary in order to present the Court with an adequate record and to provide the parties an adequate opportunity to prepare their case. At no point prior to your November 7 email did STC ever request that the "transferring" limitations be construed. Now, your purported justification for reopening claim construction is that your team changed its mind about this term. Intel does not believe that is good cause for disrupting the already-completed claim construction process at this late date. Should STC move for the inclusion of the "transferring" terms in the claim construction process, Intel will object.

Brian

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**From:** Steve Pedersen [mailto:pedersen@stadheimgrear.com]  
**Sent:** Monday, November 07, 2011 2:42 PM  
**To:** Brian Ferrall  
**Cc:** Ben Hur; Paven Malhotra; Patricia Bazianos  
**Subject:** RE: STC.UNM v. Intel -- "transferring" constructions

Brian, In addition to my remarks below, we noticed the importance of the overall claim term being construed in reviewing for the hearing. -Steve

**From:** Brian Ferrall [mailto:BFerrall@KVN.com]  
**Sent:** Monday, November 07, 2011 4:02 PM  
**To:** Steve Pedersen  
**Cc:** Ben Hur; Paven Malhotra; Patricia Bazianos  
**Subject:** RE: STC.UNM v. Intel -- "transferring" constructions

Sorry to belabor the point, but my question is why are you just suggesting this now?

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**From:** Steve Pedersen [mailto:pedersen@stadheimgrear.com]  
**Sent:** Monday, November 07, 2011 1:58 PM  
**To:** Brian Ferrall  
**Cc:** Ben Hur; Paven Malhotra; Patricia Bazianos  
**Subject:** RE: STC.UNM v. Intel -- "transferring" constructions

Brian,

STC has consistently stated that the words "parts of said first mask layer" and "combined mask . . ." should be construed in light of the overall "transferring" limitation. Construing the remaining language would assure the proper construction is applied.

I'm open to discussion, but I believe we would propose submitting two sets of short, simultaneous briefs -- like the previous terms.

-Steve

**From:** Brian Ferrall [mailto:BFerrall@KVN.com]  
**Sent:** Monday, November 07, 2011 3:23 PM  
**To:** Steve Pedersen  
**Cc:** Ben Hur; Paven Malhotra; Patricia Bazianos  
**Subject:** RE: STC.UNM v. Intel -- "transferring" constructions

Steve,

Before I go back to my team and client to discuss, can you tell me the reason for this late addition? Also, how do you propose we present it to the Court, in the event we disagree with your proposed construction?

Brian



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**From:** Steve Pedersen [mailto:pedersen@stadheimgear.com]  
**Sent:** Monday, November 07, 2011 12:56 PM  
**To:** Brian Ferrall  
**Cc:** Ben Hur; Paven Malhotra; Patricia Bazianos  
**Subject:** STC.UNM v. Intel -- "transferring" constructions

Brian,

STC is going to move for the Court to adopt the below constructions for the "transferring" limitations. Since claim construction is an evolving process, STC is of the view that it is proper for the Court to construe later identified claim terms, in addition to the terms that were initially identified by the parties. Please let us know Intel's position. Feel free to contact me with questions, etc.

-Steve

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"transferring said first pattern into said first mask material" and "transferring said first pattern and said second pattern into said substrate"

STC: transferring, for example, by etching, deposition and-lift off, or damascene (etching, deposition and polishing to produce an inlaid structure), said first pattern into said first mask material.

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transferring for example, by etching, deposition and-lift off, or damascene (etching, deposition and polishing to produce an inlaid structure), said first pattern and said second pattern into said substrate.