

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

In re U.S. Patent No. 6,947,882

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Title: REGIONALLY TIME MULTIPLEXED
EMULATION SYSTEM

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**PETITIONER'S REQUEST FOR REHEARING ON DECISION NOT TO
INSTITUTE *INTER PARTES* REVIEW UNDER 37 C.F.R. § 42.71**

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EXHIBIT LIST

Previously Filed

SYNOPSISYS	1001	U.S. Pat. 6,947,882 (the “882 patent”)
SYNOPSISYS	1002	U.S. Pat. 5,960,191 (the “191 patent”)
SYNOPSISYS	1003	U.S. Pat. 5,475,830 (“Chen”)
SYNOPSISYS	1004	U.S. Pat. 6,020,760 (the “760 patent”)
SYNOPSISYS	1005	U.S. Pat. 5,761,484 (“Agarwal”)
SYNOPSISYS	1006	U.S. App. Ser. No. 09/404,920 dated Sept. 24, 1999
SYNOPSISYS	1007	Office Action dated Nov. 8, 2002
SYNOPSISYS	1008	Office Action Response dated Dec. 24, 2002
SYNOPSISYS	1009	Office Action dated Feb. 10, 2003
SYNOPSISYS	1010	RCE and Amendment dated July 10, 2003
SYNOPSISYS	1011	Office Action dated Aug. 25, 2003
SYNOPSISYS	1012	Response to Restriction Requirement dated Sept. 17, 2003
SYNOPSISYS	1013	Office Action dated Dec. 5, 2003
SYNOPSISYS	1014	Office Action Response dated March 3, 2004

Currently Filed

SYNOPSISYS	1015	Merriam-Webster Definition of “Independent”
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PETITIONER’S REQUEST FOR REHEARING ON DECISION NOT TO INSTITUTE *INTER PARTES* REVIEW UNDER 37 C.F.R. § 42.71

Synopsys respectfully requests rehearing of the Board’s Decision not to institute an *inter partes* review trial. Synopsys’ Petition for *Inter Partes* Review identified specific references that constitute prior art to U.S. Patent No. 6,947,882 (the “’882 patent”). This prior art anticipates claims 1-14 and 17-20 of the ’882 patent. After improperly adding a limitation to the claims, the Board disagreed, finding that there was not a reasonable likelihood that at least one of the challenged claims was unpatentable. Synopsys submits that the Board’s decision constitutes legal error and an abuse of discretion.

I. BASES FOR REHEARING

This request is authorized by 37 C.F.R. § 42.71(c) and (d). The Board acknowledged in its decision that it must always interpret claims using the “broadest reasonable interpretation” standard, yet did not do so in this instance. Instead, the Board made an erroneous conclusion of law when it construed the “independent” clocking/ clock signal limitations. Specifically, the Board construed those limitations to require separate clock sources, even though the source of the clocking/ clock signals is nowhere mentioned in the claims. Based on this erroneous construction, the Board rejected Synopsys’ Petition.

The Board also misapprehended the prior art when applying its narrow construction. The Board erroneously found that the prior art did not teach

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