

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

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

Trial Number: _____

Filed: Sept. 24, 1999

Issued: Sept. 20, 2005

Inventors: Frederic Reblewski
Olivier Lepaps
Jean Barbier

Assignee: Mentor Graphics Corporation

Title: REGIONALLY TIME MULTIPLEXED
EMULATION SYSTEM

Mail Stop *Patent Board, PTAB*
United State Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 6,947,882
UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42.100 ET SEQ.

TABLE OF CONTENTS

TABLE OF CONTENTSii

EXHIBIT LISTiv

I. MANDATORY NOTICES 1

 A. Real Party-In-Interest 1

 B. Related Matters..... 1

 C. Lead And Back-Up Counsel 1

 D. Service Information..... 2

II. PAYMENT OF FEES 2

III. REQUIREMENTS FOR *INTER PARTES* REVIEW 3

 A. Grounds For Standing 3

 B. Identification Of Challenge..... 3

 1. Claims for which *inter partes* review is requested 3

 2. The specific art and statutory ground(s) on which the challenge is based..... 3

 3. How the challenged claims are to be construed..... 5

 4. How the construed claims are unpatentable under the statutory grounds identified in paragraph (b)(2) of this section 5

 5. Supporting evidence relied upon to support the challenge 6

IV. SUMMARY OF THE '882 PATENT 6

 A. Description Of The Alleged Invention..... 6

 B. Summary Of The Prosecution History..... 7

TABLE OF CONTENTS (CONT'D)

V.	THERE IS A REASONABLE LIKELIHOOD THAT AT LEAST ONE CLAIM OF THE '882 PATENT IS UNPATENTABLE	9
A.	Identification Of The References As Prior Art	9
B.	Summary Of Invalidity Arguments	10
1.	The '191 patent invalidates claims 1-14 and 17-20 of the '882 patent.....	10
2.	The '760 patent invalidates claims 5-8 and 17-20 of the '882 patent.....	13
3.	The Agarwal patent invalidates claims 5-8, 17, and 20 of the '882 patent.....	13
VI.	DETAILED EXPLANATION.....	14
A.	'191 Patent Claim Chart.....	14
B.	'760 Patent Claim Chart.....	40
C.	Agarwal Claim Chart.....	48
VII.	CONCLUSION	56

EXHIBIT LIST

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

Petitioner Synopsys, Inc. (“Synopsys” or “Petitioner”) respectfully requests *inter partes* review for claims 1-14 and 17-20 of U.S. Patent No. 6,947,882 (the “882 patent,” attached as Ex. 1001) in accordance with 35 U.S.C. §§ 311-319 and 37 C.F.R. § 42.100 et seq.

I. MANDATORY NOTICES

Pursuant to 37 C.F.R. § 42.8(a)(1), Synopsys provides the following mandatory disclosures.

A. Real Party-In-Interest

Pursuant to 37 C.F.R. § 42.8(b)(1), Petitioner certifies that Synopsys, Inc. is the real party-in-interest.

B. Related Matters

Pursuant to 37 C.F.R. § 42.8(b)(2), Petitioner identifies the following judicial or administrative matters that would affect, or be affected by, a decision in this proceeding: *Mentor Graphics Corp. v. EVE-USA, Inc. et al.*, No. 3-12-cv-01500 (D. Or. Aug. 17, 2012).

C. Lead And Back-Up Counsel

Pursuant to 37 C.F.R. § 42.8(b)(3), Petitioner provides the following designation of counsel:

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.