

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SYNOPSYS, INC.
Petitioner

v.

Patent of MENTOR GRAPHICS CORPORATION
Patent Owner

Case IPR2012-00042 (SCM)
Patent 6,240,376 B1

**PETITIONER'S OBJECTIONS TO EXHIBITS IN PATENT OWNER'S
REPLY IN SUPPORT OF ITS SUBSTITUTE MOTION TO AMEND**

**PETITIONER’S OBJECTIONS TO EXHIBITS IN PATENT OWNER’S
REPLY IN SUPPORT OF ITS SUBSTITUTE MOTION TO AMEND**

Petitioner Synopsys, Inc. hereby objects pursuant to 37 C.F.R. § 42.64(b) to Exhibits 2030, 2031, and 2033 submitted by Patent Owner in its Reply in Support of its Substitute Motion to Amend (“Reply”). Patent Owner objects to these exhibits as irrelevant to the issues before the Board.

Neither Ex. 2030 nor 2031 are even referenced in Patent Owner’s Reply. Moreover, they pertain to paragraph 33 of Dr. Hutchings’ declaration which he deleted of his own accord during his deposition. See Ex. 2032 at 27:24-28:11.

Patent Owner submitted Ex. 2033 to attempt to swear behind the Boubezari reference. However, as noted in Petitioner’s Opposition (paper 35 at 9) “whether Boubezari qualifies as prior art is irrelevant here because Petitioner is relying on Boubezari to show the level of knowledge and skill in the art at the time of the invention, not as a prior art reference to be combined with Gregory.” Thus whether or not Patent Owner can “swear behind” Boubezari is irrelevant and so is Ex. 2033. We believe the Board already addressed this issue when it denied Patent Owner’s request for extra pages.

Dated: October 5, 2013

Respectfully submitted,

By: /Travis Jensen/

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CERTIFICATE OF SERVICE

The undersigned certifies e-mail service pursuant to 37 C.F.R. § 42.6(e) and agreement of counsel of a true copy of the foregoing PETITIONER'S OBJECTIONS TO EXHIBITS IN PATENT OWNER'S REPLY IN SUPPORT OF ITS SUBSTITUTE MOTION TO AMEND to counsel of record for Patent Owner as follows:

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Dated: October 5, 2013

By: /s/ Travis Jensen

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