

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

In re U.S. Patent No. 6,240,376	Trial No.:	IPR 2012-00042
Application No.: 09/127,587		
Filed: July 31, 1998		
Issued: May 29, 2001	Atty. Dkt. No.	007121.00004
Inventors: Alain Raynaud Luc M. Burgun		
Patent Owner: Mentor Graphics Corporation		
For: METHOD AND APPARATUS FOR GATE-LEVEL SIMULATION OF SYNTHESIZED REGISTER TRANSFER LEVEL DESIGNS WITH SOURCE-LEVEL DEBUGGING		

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**PATENT OWNER'S OPPOSITION TO PETITIONER'S MOTION TO EXCLUDE
EVIDENCE UNDER 37 C.F.R. §42.64(c)**

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EXHIBIT LIST**Previously Filed**

- MG 2001 First Amended Complaint in *Mentor Graphics Corp. v. EVE-USA, Inc. and Emulation and Verification Engineering, SA*, 6:06-CV-00341-AA (D. OR., filed March 13, 2006)
- MG 2002 Defendants' Unopposed Motion By Special Appearance For Extension Of Time To Respond To Plaintiff's First Amended Complaint in *Mentor Graphics Corp. v. EVE-USA, Inc. and Emulation and Verification Engineering, SA*, 6:06-CV-00341-AA (D. Or., filed May 23, 2006)
- MG 2003 Order of Dismissal in *Mentor Graphics Corp. v. EVE-USA, Inc. and Emulation and Verification Engineering, SA*, 6:06-CV-00341-AA (D. Or., filed November 20, 2006)
- MG 2004 Complaint for Declaratory Judgment and Injunctive Relief in *Synopsys, Inc., EVE-USA, Inc. and Emulation and Verification Engineering, S.A. v. Mentor Graphics Corp.*, 3:12-cv-05025 (N.D. Cal., filed September 27, 2012)
- MG 2005 Banner & Witcoff, Ltd.'s "Messenger Log"
- MG 2006 October 4, 2012 Synopsys Press Release "Synopsys Acquires EVE"
- MG 2007 EVE-USA's Supplemental Corporate Disclosure Statement, Docket No. 7, filed October 26, 2012 in *Synopsys, Inc. et al. v. Mentor Graphics Corp.*, 3:12-CV-05025 (N.D. Cal. filed September 27, 2012)
- MG 2008 Jansen, D., The Electronic Design Automation Handbook, Kluwer Academic Publishers, 2003, Chapter 2
- MG 2009 Bhatnagar, Advanced ASIC Chip Synthesis: Using Synopsys® Design Compiler™ and PrimeTime®, Kluwer Academic Publishers, 1999
- MG 2010 Gregory et al. U.S. Patent No. 5,937,190

- MG 2011 HDL Compiler™ for VHDL User Guide, Version F-2011.09-SP4, March 2012, SYNOPSYS, Section 4
- MG 2012 Plaintiffs' Opposition to Mentor Graphics Corporation's Motion to Transfer, dated January 25, 2013
- MG 2013 Notice of Incomplete Petition, mailed November 30, 2012 in *CMI Corp. v. Yoshiharu, et. al.*, PTAB Case IPR 2013-00066
- MG 2014 Response to Notice of *Incomplete* Petition Issued November 30, 2012, filed November 30, 2012 in *CMI Corp. v. Yoshiharu, et. al.*, PTAB Case IPR 2013-00066
- MG 2015 Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response, mailed December 5, 2012 in *CMI Corp. v. Yoshiharu, et. al.*, PTAB Case IPR 2013-00066
- MG 2016 Declaration of Allison Anderson
- MG 2017 Notice of Filing Date Accorded to Petition and Notice for Setting the Time Period for Filing Patent Owner Preliminary Response
- MG 2018 [Proposed] Patent Owner's Requests for Production To Petitioner
- MG 2019 [Proposed] Patent Owner's Interrogatories To Petitioner
- MG 2020 [Proposed] Patent Owner's Requests for Admission To Petitioner
- MG 2021 [Proposed] Patent Owner's Notice of Deposition of Petitioner Synopsys
- MG 2022 Assignment of the '376 Patent from inventors to Mentor Graphics Corp
- MG 2023 Notice of Party Name Change, filed March 22, 2013, in *EVE-USA, Inc. and Emulation and Verification Engineering, S.A. v. Mentor Graphics Corp.*, 3:12-cv-05025 (N.D. Cal., filed September 27, 2012)
- MG 2024 Slide presentation "Meeting Verification Challenges" by Luc Burgun, VP, Synopsys Emulation Division, Verification Group, November 2012

- MG 2025 Silicon Valley Wire press release "Mountain View Based Synopsys Acquires EVE," dated October 4, 2012
- MG 2026 LinkedIn Profile of Luc Burgun listing his employment history
- MG 2027 Declaration of Majid Sarrafzadeh, PH.D in Support of Patent Owner Response, including Exhibits A through E thereto
- MG 2028 Declaration of Michael Sapoznikow in Support of Mentor Graphics Corporation's Motion for Partial Summary Judgment, filed 05/31/13 in Case 3:10-cv-00954-MO Doc. 369 (exhibit 5)
- MG 2029 Declaration Of Patrick M. Bible In Support Of Mentor Graphics Corporation's Motion For Partial Summary Judgment, filed 05/31/13 in Case 3:10-cv-00954-MO Doc. 368 (exhibits 2, 3, 8, 9-11, 15, 18-21, 27, 30, 32-34, 40)
- MG 2030 Annotated Figure 13 of the Gregory et al. '109 Patent (Hutchings Deposition Exhibit)
- MG 2031 Annotated Figure 17 of the Gregory et al. '109 Patent (Hutchings Deposition Exhibit)
- MG 2032 Transcript of Deposition of Brad Hutchings Ph.D. conducted September 20, 2013
- MG 2033 Declaration of William D. Davis

Currently Filed

- MG 2034 Patent Owner's Supplemental Evidence Pursuant to 37 C.F.R. § 42.64(b)(2) (transmittal)
- MG 2035 Declaration of Fabrice Touzard

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