

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

A TopTech, Inc.
Petitioner

v.

Synopsys, Inc.
Patent Owner

Case IPR2014-01145
Patent 6,237,127

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 6,237,127**

TABLE OF CONTENTS

I.	COMPLIANCE WITH PETITION REQUIREMENTS	1
A.	Certification the `127 Patent May Be Contested By Petitioner	1
B.	Fee For Inter Partes Review (37 C.F.R. § 42.15(a) and § 42.103) ..	1
C.	Mandatory Notices (37 C.F.R. § 42.8)	1
1.	Real Party-In-Interest (§ 42.8(b)(1)).....	1
2.	Related Matters (§ 42.8 (b)(2))	1
3.	Lead And Backup Counsel (§ 42.8 (b)(3))	1
4.	Service Information (§ 42.8 (b)(4))	2
D.	Proof Of Service (§ 42.6(e) and § 42.105(a))	2
II.	IDENTIFICATION OF CLAIMS BEING CHALLENGED (§ 42.104(B)).....	2
III.	RELEVANT INFORMATION CONCERNING THE `127 PATENT	2
A.	Subject Matter of the `127 Patent.....	2
1.	Calculating Delay Values with Timing Table Propagation.....	4
2.	Tracking “Exceptions” with Timing Table Propagation	4
3.	“Exceptions” – Non-Default Timing Constraints.....	6
4.	“Pin-Labeling” – Associating the “Exceptions” with the Circuit	8
5.	Comparing the Delay Values in the Timing Tables to the Circuit Constraints and Applying the Relevant Exceptions.	9
B.	Effective Filing Date And Prosecution History Of The `127 Patent	10
1.	Belkhale’s Significance was not Recognized During Prosecution.....	11

C.	How the Challenged Claims Are To Be Construed	12
IV.	PRECISE REASONS FOR RELIEF REQUESTED.....	12
A.	Belkhale Anticipates or Renders Obvious Claims 1-11 and 13 ...	12
1.	Overview Of Belkhale	12
B.	Belkhale Invalidates Claims 1-11 and 13 of the `127 Patent.....	18
1.	Belkhale Teaches The Preamble Of Claim 1	18
2.	Belkhale Teaches The First Element Of Claim 1	19
a.	Correct Construction of the First Element of Claim 1 ...	19
b.	Belkhale Teaches Marking the Circuit Description with Exceptions.....	20
3.	Belkhale Teaches The Second Element Of Claim 1	22
a.	Correct Construction “Timing Tables”	23
4.	Belkhale Teaches The Final Element Of Claim 1	25
a.	The Correct Construction of “Tag”	27
5.	Belkhale Anticipates or Renders Obvious Claim 2	29
6.	Belkhale Anticipates or Renders Obvious Claim 3	30
7.	Belkhale Anticipates or Renders Obvious Claim 4	30
8.	Belkhale Anticipates or Renders Obvious Claim 5	31
9.	Belkhale Anticipates or Renders Obvious Claim 6	33
10.	Belkhale Anticipates or Renders Obvious Claims 7 & 8	34
11.	Belkhale Anticipates or Renders Obvious Claim 9	35
12.	Belkhale Anticipates or Renders Obvious Claims 10 and 11 ...	36
13.	Belkhale Anticipates or Renders Obvious Claim 13	37

C.	Belkhale Renders Claim 12 Obvious in view of the Knowledge of One of Ordinary Skill in the Art.....	39
D.	Claims 1-13 are Obvious over Belkhale in view of Tom.....	40
1.	Overview Of Tom	40
2.	Motivation to combine Tom with Belkhale.....	42
3.	Belkhale in View of Tom Renders Obvious Claims 1-13	45
V.	CONCLUSION	60

TABLE OF AUTHORITIES

Cases

KSR Intern. Co. v. Teleflex Inc., 550 U.S. 398 (2007)47
Merrill v. Yeomans, 94 U.S. 568 (1876).....28

Statutes

35 U.S.C. § 102 2, 13, 40
35 U.S.C. § 103 2, 10
35 U.S.C. § 315(b)1

Rules

37 C.F.R. § 42.8 (b)(2).....1
37 C.F.R. § 42.8 (b)(3).....1
37 C.F.R. § 42.8 (b)(4).....2
37 CFR § 42.100(b)12

Attachment A: Proof of Service of the Petition

Attachment B: List of Evidence and Exhibits Relied Upon in Petition

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.