

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ARISTA NETWORKS, INC.
Petitioner

v.

CISCO SYSTEMS, INC.
Patent Owner

Case IPR2015-01710
Patent 7,224,668

PATENT OWNER PRELIMINARY RESPONSE

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

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 3. “means for passing packets through the control plane port, rather than directly from the physical ports to individual control plane processes” (claim 38).20

4. “means for configuring the control plane port services as an entity separate from physical port services” (claim 54).20

V. Ground 1: Petitioner fails to show that Claims 1-6, 8, 9, 10, 12, 13, 15-22, 24-27, 28, 30, 31, 33-40, 42, 43, 45-47, 48, 49, 51-58, 60-63, 64, 66, 67, 69-72 are obvious over Frazier in view of Habraken.21

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2. Petitioner fails to show that the combination of Frazier and Habraken discloses “control plane port services.”30

3. Petitioner fails to provide a *prima facie* case of obviousness for the combination of Frazier and Habraken to “[execute] port services, [] on packets entering and exiting the physical network interface ports” (elements 1.2/19.2/37.2/55.2).33

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