#### UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ARISTA NETWORKS, INC. Petitioner

V.

CISCO SYSTEMS, INC.
Patent Owner

Case IPR2016-00309 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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	A.	The Board should reject Petitioner's means-plus-function analysis		20	
		1.	"means for configuring a plurality of physical network interface ports" (claim 37).		
		2.	"means for processing packets originating at a plurality of physical ports" (claim 38).	23	
		3.	"means for passing packets through the control plane port, rather than directly from the physical ports to individual control plane processes" (claim 38).		



	4.	"means for configuring the control plane port services as an entity separate from physical port services" (claim 54)	.24		
	Ground 1: Petitioner fails to show that claims 1–6, 8, 9, 15–22, 24–27, 33–40, 42, 51–58, 60–63, and 69–72 are obvious over Amara and CoreBuilder.				
A.	Ama	ara's packet-forwarding device.	.25		
B.	Core	eBuilder's Administration Console	.27		
C.	Core	tioner fails to show that the combination of Amara and eBuilder teaches or suggests all of the elements of the challenge ependent claims.	d .28		
	1.	Petitioner fails to show that the combination of Amara and CoreBuilder discloses "a plurality of physical network interfat ports for providing a physical connection point to a network the ports being configurable by control plane processes" (elements 1.1/19.1/37.1/55.1) or "the port services as defined by control plane configurations" (elements 1.2/19.2/37.2/55.2)			
	2.	Petitioner fails to show that the combination of Amara and CoreBuilder teaches or suggests "[executing] port services, [] on packets entering and exiting the physical network interface ports, the port services providing an ability to control and monitor packet flows" (elements 1.2/19.2/37.2/55.2)	е		
	3.	Petitioner fails to show that the combination of Amara and CoreBuilder teaches or suggests "operat[e][ing] on packets received from specific, predetermined physical ports and destined to the collection of control plane processes" (element 1.5/19.5/37.5/55.5).	nts .34		
		Petitioner fails to show that claims 7, 23, 41, and 59 are obvious Amara, CoreBuilder, and Moberg under 35 U.S.C § 103			
٨	The	invention of Mohera	36		



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	B.	The combination of Amara, CoreBuilder, and Moberg does not teach or suggest distributing control plane processes across multiple processors.			
VII.	49, 64	ound 3: Petitioner fails to show that claims 10, 12, 13, 28, 30, 31, 43, 48, 64, 66, and 67 are obvious in view of Amara, CoreBuilder, and oramanian under 35 U.S.C § 103.			
VIII.	49, 64	nd 4: Petitioner fails to show that claims 10, 12, 13, 28, 30, 31, 43, 48, 4, 66, and 67 are obvious in view of Amara, CoreBuilder, and Hendel 35 U.S.C § 103.			
	A.	The Board should reject Ground 4 because this ground is redundant to Ground 3			
	В.	Petitioner fails to show that the combination of Amara, CoreBuilder, and Hendel discloses applying distributed control plane port services only to packets received from specific, pre-determined physical ports.			
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