

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re Patent of: Smethurst et al.  
U.S. Patent No.: 7,224,668  
Issue Date: May 29, 2007                      Atty Docket No.: 40963-0006IP3  
Appl. Serial No.: 10/307,154                      PTAB Dkt. No.: TBD  
Filing Date: Nov. 27, 2002  
Title: CONTROL PLANE SECURITY AND TRAFFIC FLOW  
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**PETITION FOR *INTER PARTES* REVIEW OF UNITED STATES PATENT  
NO. 7,224,668 PURSUANT TO 35 U.S.C. §§ 311-319, 37 C.F.R. § 42**

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A-10. “means for configuring the control plane port services as an entity separate from physical port services” (cl. 54) .....11

VI. MANNER OF APPLYING CITED PRIOR ART TO EVERY CLAIM FOR WHICH IPR IS REQUESTED, THUS ESTABLISHING A REASONABLE LIKELIHOOD THAT AT LEAST ONE CLAIM OF THE ’668 PATENT IS UNPATENTABLE .....12

A. [Ground 1] — Claims 1-6, 8, 9, 15-22, 24-27, 33-40, 42, 51-58, 60-63, and 69-72 are obvious over Amara in view of CoreBuilder under 35 U.S.C. § 103 .12

B. [Ground 2] — Claims 7, 23, 41, 59 are obvious over Amara and CoreBuilder in view of Moberg under 35 U.S.C. § 103.....40

C. [Ground 3] — Claims 10, 12, 13, 28, 30, 31, 43, 48, 49, 64, 66, and 67 are obvious over Amara and CoreBuilder in view of Subramanian under 35 U.S.C. § 103.....42

D. [Ground 4] — Claims 10, 12, 13, 28, 30, 31, 43, 48, 49, 64, 66, and 67 are obvious over Amara and CoreBuilder in view of Hendel under 35 U.S.C. § 103  
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## EXHIBITS

ARISTA-1001	U.S. Patent No. 7,224,668 to Smethurst et al. (“the ’668 Patent”)
ARISTA-1002	Declaration of Dr. Bill Lin
ARISTA-1003	Curriculum Vitae of Dr. Bill Lin
ARISTA-1004	U.S. Patent No. 6,674,743 (“Amara”)
ARISTA-1005	U.S. Patent No. 6,460,146 (“Moberg”)
ARISTA-1006	U.S. Patent No. 6,970,943 (“Subramanian”)
ARISTA-1007	U.S. Patent No. 6,115,378 (“Hendel”)
ARISTA-1008	IETF RFC 2661, “Layer Two Tunneling Protocol ‘L2TP’” (“IETF RFC 2661”)
ARISTA-1009	3Com CoreBuilder 3500 Implementation Guide, 3Com MSD Technical Publications, November 1999 (“CoreBuilder”)
ARISTA-1010	Declaration of Patricia Crawford
ARISTA-1011	File History of U.S. Patent No. 7,224,668

Arista Networks, Inc. (“Petitioner” or “Arista”) petitions for *Inter Partes* Review (“IPR”) under 35 U.S.C. §§ 311–319 and 37 C.F.R. § 42 of claims 1-10, 12, 13, 15-28, 30, 31, 33-43, 48, 49, 51-64, 66, 67, and 69-72 (“the Challenged Claims”) of U.S. Patent No. 7,224,668 (“the ’668 Patent”). There exists a reasonable likelihood that Petitioner will prevail in demonstrating unpatentability of the Challenged Claims.

**I. MANDATORY NOTICES UNDER 37 C.F.R § 42.8(a)(1)**

**A. Real Party-In-Interest Under 37 C.F.R. § 42.8(b)(1)**

Arista Networks, Inc. is the real party-in-interest.

**B. Related Matters Under 37 C.F.R. § 42.8(b)(2)**

The ’668 Patent is the subject of Civil Action No. 4:14-cv-5343-JSW, filed December 5, 2014 in the Northern District of California, and International Trade Commission Investigation No. 337-TA-945, instituted on January 20, 2015. On April 1, 2015, Petitioner filed a petition for IPR of the ’668 Patent, identified by proceeding number IPR2015-00974, which was subsequently denied institution on October 6, 2015. On August 11, 2015, the Petitioner filed a petition for IPR of the ’668 Patent, identified by proceeding number IPR2015-01710, which is pending.

**C. Lead And Back-Up Counsel and Service Information**

Petitioner designates W. Karl Renner, Reg. No. 41,265, as Lead Counsel, and Kevin E. Greene, Reg. No. 46,031, as Backup Counsel, both available at 3200

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