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

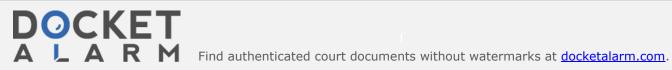


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	A-2. "means for configuring a plurality of physical network interface ports" (cl. 37)	
	A-3. "means for executing port services on packets entering and exiting the physical network interface ports" (cl. 37)	
	A-4. "means for executing a plurality of control plane processes" (cl. 37)	9
	A-5. "means for accessing the collection of control plane processes as a control plane port entity" (cl. 37)	.9
	A-6. "means for operating on packets received from specific, predetermined physical ports and destined to the collection of control plane processes in a way that is independent of the individual physical port interface configuration and port services applied thereto" (cl. 37)	n
	A-7. "means for processing packets originating at a plurality of physical ports, said means further comprising: means for passing packets through the control plane port, rather than directly from the physical ports to individual control plane processes" (cl. 38)	0
	A-8. "means for applying distributed control plane port services only to the packets received from the specific, pre-determined physical ports" (cl. 43)1	



((A-9. "means for applying port services to the control plane port additional comprises means for applying services selected from a group consisting of Quality of Service functions, packet classification, packet marking, packet queuing, packet rate limiting, flow control, and other access policies for packets destined to the control plane port" (cl. 53)	•
	A-10. "means for configuring the control plane port services as an entity separate from physical port services" (cl. 54)	.11
WHIO LIKE	MANNER OF APPLYING CITED PRIOR ART TO EVERY CLAIM FOR CH IPR IS REQUESTED, THUS ESTABLISHING A REASONABLE CLIHOOD THAT AT LEAST ONE CLAIM OF THE '668 PATENT IS ATENTABLE	
	[Ground 1] — Claims 1-6, 8, 9, 15-22, 24-27, 33-40, 42, 51-58, 60-63, are obvious over Amara in view of CoreBuilder under 35 U.S.C. § 103.	
B. Con	[Ground 2] — Claims 7, 23, 41, 59 are obvious over Amara and reBuilder in view of Moberg under 35 U.S.C. § 103	.40
	[Ground 3] — Claims 10, 12, 13, 28, 30, 31, 43, 48, 49, 64, 66, and 67 ar vious over Amara and CoreBuilder in view of Subramanian under 35 U.S.C 03	
	[Ground 4] — Claims 10, 12, 13, 28, 30, 31, 43, 48, 49, 64, 66, and 67 are vious over Amara and CoreBuilder in view of Hendel under 35 U.S.C. § 103 52	
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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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