

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent of: Udo Hartmann, Sascha Nerger
U.S. Patent No.: 7,124,325 Attorney Docket No.: 24069-0004IP1
Issue Date: October 17, 2006
Appl. Serial No.: 10/680,782
Filing Date: October 7, 2003
Title: Method And Apparatus for Internally Trimming Output
Drivers and Terminations in Semiconductor Devices

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**PETITION FOR *INTER PARTES* REVIEW OF UNITED STATES PATENT
NO. 7,124,325 PURSUANT TO 35 U.S.C. §§ 311–319, 37 C.F.R. § 42**

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EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 7,124,325 (“the ’325 patent”)
1002	Declaration of Nick Tredennick, Ph.D
1003	U.S. Patent No. 7,000,160 to Tanaka et al. (“Tanaka”)
1004	U.S. Patent No. 6,643,180 to Ikehashi et al. (“Ikehashi”)
1005	U.S. Patent No. 6,556,052 to Garrett et al. (“Garrett”)
1006	U.S. Patent No. 5,844,913 to Hassoun et al. (“Hassoun”)
1007	U.S. Patent No. 5,991,221 to Ishikawa et al. (“Ishikawa”)
1008	Return of Service for Complaint in <i>Polaris Innovations Ltd. v. Dell Inc., and NVIDIA Corp.</i> , No. 5:16-CV-451-XR (W.D. Tex. 2016)

I. INTRODUCTION

NVIDIA Corporation (“Petitioner” or “NVIDIA”) petitions for *Inter Partes* Review (“IPR”) of claims 1-20 (“the Challenged Claims”) of Patent No. 7,124,325 (“the ’325 patent”).

II. REQUIREMENTS FOR IPR

A. Standing

Petitioner certifies that the ’325 patent is available for IPR. This petition is being filed within one year of service of a complaint against Petitioner on July 25, 2016. *See* Ex. 1008, 6. Petitioner is not barred or estopped.

B. Challenge and Relief Requested

Petitioner requests IPR of the Challenged Claims on the grounds below, as explained in this petition and in Ex. 1002.

Ground	'325 Claims	Basis
Ground 1	1-20	Obvious over Tanaka and Ikehashi
Ground 2	1, 8-14, and 16-17	Obvious over Garrett and Hassoun
Ground 3	2-7, 15, and 18-20	Obvious over Garrett, Hassoun, and Ishikawa

The filing date of the '325 patent is October 7, 2003. It claims foreign priority to October 7, 2002. Each reference pre-dates this and qualifies as prior art, *e.g.*, as follows:

Reference	Date	Section
Tanaka	February 27, 2002 (filed)	102(e)
Ikehashi	April 25, 2002 (published)	102(b)
Garrett	June 13, 2002 (published)	102(b)
Hassoun	December 1, 1998 (issued)	102(b)
Ishikawa	November 23, 1999 (issued)	102(b)

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