### UNITED STATES PATENT AND TRADEMARK OFFICE

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#### BEFORE THE PATENT TRIAL AND APPEAL BOARD

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INTEL CORPORATION
Petitioner

V.

ALACRITECH, INC.
Patent Owner

Case IPR. No. **2017-01392** U.S. Patent No. 7,337,241

Title: FAST-PATH APPARATUS FOR RECEIVING DATA CORRESPONDING TO A TCP CONNECTION

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Corrected Petition For *Inter Partes* Review of U.S. Patent No. 7,337,241 Under 35 U.S.C. §§ 311-319 and 37 C.F.R. §§ 42.1-.80, 42.100-.123

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	9.3.	"Gigabit Ethernet Technical Brief: Achieving End-to-End Performance" by Alteon Networks (Ex.1033, "Alteon")	40



	9.4.	Alacritech's expert admits that almost all of the limitations are found in the prior art
	9.5.	Motivations To Combine Erickson and Tanenbaum9643
	9.6.	Motivations To Combine Erickson, Tanenbaum96, and Alteon47
10.	UNP	UND #1: CLAIMS 1-8, 18, 22, AND 23 ARE ATENTABLE AS OBVIOUS OVER ERICKSON IN BINATION WITH TANENBAUM96 AND ALTEON49
	10.1.	Claim 1 is unpatentable as obvious over Erickson in combination with Tanenbaum96 and Alteon50
		10.1.1. [1.P] A method for network communication, the method comprising:
		10.1.2. [1.1] receiving a plurality of packets from the network, each of the packets including a media access control layer header, a network layer header and a transport layer header;
		10.1.3. [1.2] processing the packets by a first mechanism, so that for each packet the network layer header and the transport layer header are validated without an interrupt dividing the processing of the network layer header and the transport layer header;
		10.1.4. [1.3] sorting the packets, dependent upon the processing, into first and second types of packets, so that the packets of the first type each contain data;55
		10.1.5. [1.4] sending, by the first mechanism, the data from each packet of the first type to a destination in memory allocated to an application without sending any of the media access control layer headers, network layer headers or transport layer headers to the destination
	10.2.	Claim 2 is unpatentable as obvious over Erickson in combination with Tanenbaum96 and Alteon58



	10.2.1. [2.1] The method of claim 1, wherein processing the packets by a first mechanism further comprises: processing the media access control layer header for each packet without an interrupt dividing the processing of the media access control layer header and the network layer header
10.3.	Claim 3 is unpatentable as obvious over Erickson in combination with Tanenbaum96 and Alteon
	10.3.1. [3.1] The method of claim 1, further comprising: processing an upper layer header of at least one of the packets by a second mechanism, thereby determining the destination, wherein the upper layer header corresponds to a protocol layer above the transport layer
10.4.	Claim 4 is unpatentable as obvious over Erickson in combination with Tanenbaum96 and Alteon61
	10.4.1. [4.1] The method of claim 1, further comprising: processing an upper layer header of at least one of the packets of the second type by a second mechanism, thereby determining the destination
10.5.	Claim 5 is unpatentable as obvious over Erickson in combination with Tanenbaum96 and Alteon61
	10.5.1. [5.1] The method of claim 1, further comprising: processing a transport layer header of another packet by a second mechanism, prior to receiving the plurality of packets from the network, thereby establishing a Transmission Control Protocol (TCP) connection for the packets of the first type
10.6.	Claim 6 is unpatentable as obvious over Erickson in combination with Tanenbaum96 and Alteon
	10.6.1. [6.1] The method of claim 1, wherein sorting the packets includes classifying each of the packets of the first type as having an Internet Protocol (IP) header and a Transmission Control Protocol (TCP)63



		m 7 is unpatentable as obvious over Erickson in bination with Tanenbaum96 and Alteon64
	10	7.1. [7.1.1] The method of claim 1, further comprising: transmitting a second plurality of packets to the network,
	10	7.2. [7.1.2] each of the second plurality of packets containing a media access control layer header, a network layer header and a transport layer header,65
	10	7.3. [7.1.3] including processing the second plurality of packets by the first mechanism, so that for each packet the media access control layer header, the network layer header and the transport layer header are prepended at one time as a packet header
		m 8 is unpatentable as obvious over Erickson in bination with Tanenbaum96 and Alteon71
	10	8.1. [8.1] The method of claim 1, wherein the first mechanism is a sequencer running microcode71
11.	OBVIOU	#2: CLAIMS 9-24 ARE UNPATENTABLE AS OVER ERICKSON IN COMBINATION WITH AUM9671
		m 9 is unpatentable as obvious over Erickson in abination with Tanenbaum9672
	11	.1. [9.P] A method for communicating information over a network, the method comprising:
	11	.2. [9.1] obtaining data from a source in memory allocated by a first processor;
	11	.3. [9.2] dividing the data into multiple segments;73
	11	.4. [9.3.1] prepending a packet header to each of the segments by a second processor, thereby forming a
		packet corresponding to each segment,



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