

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD


Unified Patents Inc. v. Plectrum LLC
Inter Partes Review No. 2017-01430
U.S. Patent No. 5,978,951

PETITIONER'S ORAL ARGUMENT

UNITED 1023

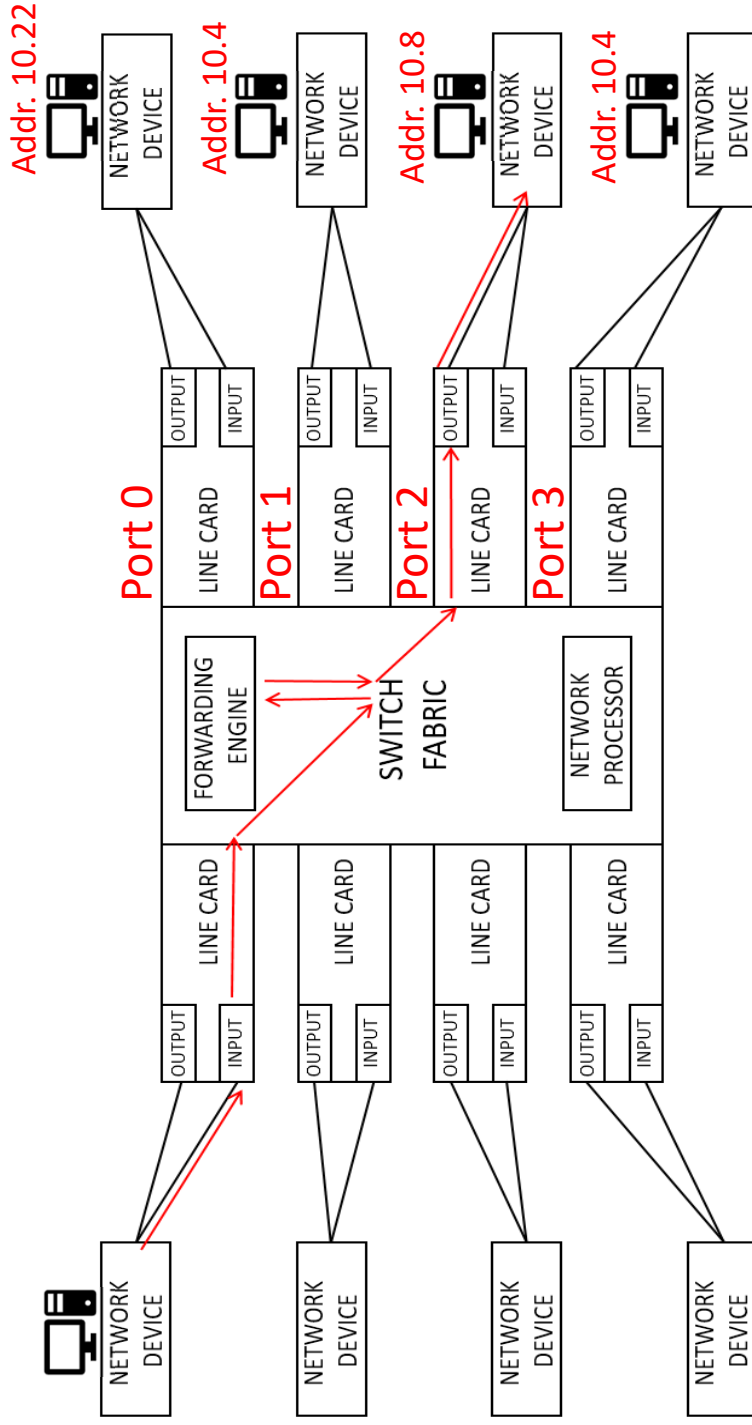
Proposed Agenda

- Overview of the '951 patent
- Overview of the prior art
- Issues raised by the Board and/or Patent Owner
 - Claims 8 and 11: substitution of *Jain's* CRC hash function in place of *Cheriton's* XOR-based hash function
 - Claims 1-6, 12-14, and 21-24: row-related limitations
- Obviousness of claims



Overview of the '951 Patent

The '951 Patent – “Bridge/Router”



Seshan Decl. (EX1007) at ¶¶ 26-29; Petition (Paper 3) at 4-8

“The ACA [Address Cache ASIC] is responsible for: maintaining a hardware address table ... searching the hardware address table for layer 2 and layer 3 addresses received from a Received Header Processing (RHP) element which parses frame headers for address information; and returning address search results, including the destination port(s) for received frames”

‘951 patent at 1:31-38

'951 Patent – Independent Claim 2

2. A method of forwarding a data unit through a network element having a cache comprised of plural rows, each having plural respective entries, the method comprising the steps of:

receiving said data unit at said network element;

parsing said data unit for address information;

encoding said received address information;

using said received, encoded address information to identify one of said cache rows;

retrieving first address information from a first entry of said identified row;

comparing said retrieved first address information with said received address information;

retrieving second address information from said first entry of said identified row if said comparison of said retrieved first address information and said received address information yields a first result; and

using said retrieved second address information for forwarding said data unit.

A method using a row-based cache, each row with multiple entries

Parse received address information (e.g., destination address (DA)) from data unit

Generate a hash address from DA and use that hash to identify a row in cache [that may have routing info for the DA]

Retrieve cached address info from row/entry and compare to DA info

If the found cached address equals the DA, retrieve second address info (e.g., a port number) from the same row/entry

Use port number to forward data unit

E.g., '951 patent at 5:25-57; Petition (Paper 3) at 11-17

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