

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.: 24069-0004IP2
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	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)
1004	U.S. Patent No. 6,693,450 (“Volk 450”)
1005	U.S. Patent No. 6,356,105 (“Volk 105”)
1006	Decision Denying Institution of <i>Inter Partes</i> Review dated June 23, 2017 for Case No. IPR2017-00382.
1007	Patent Owner’s Preliminary Response to Petition for <i>Inter Partes</i> Review of Patent No. 7,124,325 (Case No. IPR2017-00382)
1008	U.S. Patent No. 6,201,733 (“Hiraki”)
1009	Excerpts from Microsoft Computer Dictionary, Fifth Edition, 2002
1010	Excerpts from Barron’s Dictionary of Computer and Internet Terms, Eighth Edition, 2003
1011	Excerpts from McGraw-Hill, Dictionary of Computing and Communications

I. INTRODUCTION

NVIDIA Corporation (“Petitioner” or “NVIDIA”) petitions for *Inter Partes* Review (“IPR”) of claims 14 and 16-18, and 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. 1003, 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	14, 16-18	Anticipated by Volk 450
Ground 2	14, 16-17	Anticipated by Volk 105
Ground 3	14, 16–18, 20	Obvious over Volk 450 in view of Hiraki
Ground 4	14, 16–18, 20	Obvious over Volk 105 in view of Hiraki

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
Volk 450	September 29, 2000 (filed)	102(e)
Volk 105	March 12, 2002 (issued)	102(b), (e), and (a)
Hiraki	March 13, 2001 (issued)	102(b), (e), and (a)

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