UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WISTRON CORPORATION Petitioner

v.

ALACRITECH, INC. Patent Owner

Case IPR. No. IPR2018-00328 U.S. Patent No. 7,337,241 Title: FAST-PATH APPARATUS FOR RECEIVING DATA CORRESPONDING TO A TCP CONNECTION

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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	9.2 Tanenbaum96: A. Tanenbaum, Computer Networks, 3rd ed.
	(1996)
	9.3 "Gigabit Ethernet Technical Brief: Achieving End-to-End
	Performance" by Alteon Networks (Ex.1033, "Alteon")
	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 Tanenbaum96
	9.6 Motivations To Combine Erickson, Tanenbaum96, and Alteon 38
10.	GROUND #1: CLAIMS 1-8, 18, 22, AND 23 ARE
	UNPATENTABLE AS OBVIOUS OVER ERICKSON IN
	COMBINATION WITH TANENBAUM96 AND ALTEON

10.1	Claim 1 is unpatentable as obvious over Erickson in
	combination with Tanenbaum96 and Alteon
	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;
	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 Alteon
	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	·
	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 Alteon

. . .

	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	. 51
10.5	Claim 5 is unpatentable as obvious over Erickson in	
	combination with Tanenbaum96 and Alteon	. 51
	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	. 51
10.6	Claim 6 is unpatentable as obvious over Erickson in	
	combination with Tanenbaum96 and Alteon	. 53
	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).	. 53
10.7	Claim 7 is unpatentable as obvious over Erickson in	
	combination with Tanenbaum96 and Alteon	. 54
	10.7.1[7.1.1] The method of claim 1, further comprising:	
	transmitting a second plurality of packets to the	
	network,	. 54
	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,	. 55
	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.	. 56
10.8	Claim 8 is unpatentable as obvious over Erickson in	
	combination with Tanenbaum96 and Alteon	. 60
	10.8.1[8.1] The method of claim 1, wherein the first	
an or	mechanism is a sequencer running microcode.	. 60
	UND #2: CLAIMS 9-24 ARE UNPATENTABLE AS	
	IOUS OVER ERICKSON IN COMBINATION WITH	<u> </u>
1 ANI 11 1	ENBAUM96	. 00
11.1	Claim 9 is unpatentable as obvious over Erickson in	<u>(</u> 1
	combination with Tanenbaum96	. 01

11.

	11.1.1[9.P] A method for communicating information over a	
	network, the method comprising:	61
	11.1.2[9.1] obtaining data from a source in memory allocated	
	by a first processor;	61
	11.1.3[9.2] dividing the data into multiple segments;	
	11.1.4[9.3.1] prepending a packet header to each of the	
	segments by a second processor, thereby forming a	
	packet corresponding to each segment,	62
	11.1.5[9.3.2] each packet header containing a media access	
	control layer header, a network layer header and a	
	transport layer header, wherein the network layer header	
	is Internet Protocol (IP), the transport layer header is	
	Transmission Control Protocol (TCP) and	63
	11.1.6[9.3.3] the media access control layer header, the	
	network layer header and the transport layer header are	
	prepended at one time as a sequence of bits during the	
	prepending of each packet header; and	63
	11.1.7[9.4] transmitting the packets to the network	63
11.2		
	combination with Tanenbaum96	64
	11.2.1[10.1] The method of claim 9, wherein each packet	
	header is formed based upon a block of information	
	created by the first processor.	64
11.3	Claim 11 is unpatentable as obvious over Erickson in	
	combination with Tanenbaum96	64
	11.3.1[11.1] The method of claim 9, further comprising:	
	receiving another packet from the network, the other	
	packet containing a receive header including	
	information corresponding to a network layer and a	
	transport layer; and	64
	11.3.2[11.2] determining, by the second processor, whether	
	the other packet corresponds to the same TCP	
	connection as the transmitted packets	65
11.4	Claim 12 is unpatentable as obvious over Erickson in	
	combination with Tanenbaum96	66
	11.4.1[12.1] The method of claim 9, further comprising	
	establishing a Transmission Control Protocol (TCP)	
	connection by the first processor and using the	
	connection to prepend the packet header to each of the	
	segments by the second processor.	66

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