An article entitled, "Development of a Parallel Molecular Dynamics Code on SIMD Computers: Algorithm for Criterion," by Roccatano et al. ("Roccatano") was published in the Journal of Computational Chemistry, vol. 19, 1998 and is therefore prior art to U.S. Patent No. 7,620,800 ("800 Patent") at least under 35 U.S.C. §§ 102(a) ar

As described in detail below, Roccatano anticipates the asserted claim(s) of the '800 Patent. To the extent it is for does not expressly disclose certain limitations in the asserted claim, such limitations are inherent. Furthermore, the found that Roccatano does not anticipate the asserted claim, Roccatano renders the asserted claim obvious, either combination with other prior art identified in the cover pleading or herein.

Asserted Claim of '800	Exemplary Disclosure of Roccatano
Patent	
[1A] A method for data	At least under Plaintiff's apparent theories of infringement and interpretations
processing in a reconfigurable	alleging that any of Defendant's accused products satisfy this claim limitation
computing system, the reconfigurable computing	in combination with one or more references, discloses:
system comprising at least one	Roccatano at Abstract: "In recent years several implementations of molecular
reconfigurable processor, the	have been reported on multiple instruction multiple data MIMD machines. He
reconfigurable processor	implementations of MD codes on single instruction multiple data SIMD mach
comprising a plurality of	reported. The difficulty in using pair lists of nonbonded interactions is the ma
functional units, said method	codes for SIMD machines, such that, generally, the full connectivity computa
comprising:	We present an algorithm, the global cut-off algorithm GCA, which permits th
	SIMD machines. GCA is based on a probabilistic approach and requires the c
	simultaneously verified on all nodes of the machine. The MD code used was
	GROMOS package; only the routines involved in the pair lists and in the com
	interactions were rewritten for a parallel architecture. The remaining calculati
	the host computer. The algorithm has been tested on Quadrics computers for a
	128, and 512 processors and for systems of 4000, 8000, 15,000, and 30,000 p
	Roccatano at 686: "Classical molecular dynamics MD is used to study the pro-
	solids, and molecules. The Newton equation of motion for each particle of the
	numerical integration and its trajectory is obtained. From this microscopic pot

This chart is subject to all reservations, objections, and disclaimers in Microsoft's Invalidity Contentions and any supplement, or modification thereof, which are incorporated herein by reference in their entirety.

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microscopic and macroscopic properties can be obtained. The need for numer the time step to the femtosecond scale and makes MD simulation a very time Therefore, considerable efforts have been concentrated on optimizing MD con computers of different architectures."
Roccatano at 686: "Less work has been done using SIMD systems. In general full connectivity computation; that is, all atom pair interactions are calculated long-range force systems. This is due to the difficulty of using pair lists of not SIMD machines with no local addressing.
In the present study we propose an algorithm that permits the use of pair lists SIMD machine with no local addressing. The algorithm requires simultaneous step and geometric decomposition methods. In addition, the systolic loop met reduce computation time.
The method was tested on Quadrics computers, a class of SIMD machines de Alenia Spazio, for configurations of 32, 128, and 512 processors."
To the extent Plaintiff asserts this limitation is not expressly or inherently disc apparent claim construction, or any other claim construction, the claimed subj been obvious to a person of ordinary skill in the art considering this reference the knowledge of one of ordinary skill in the art at the time of the alleged inve disclosures in one or more of the references identified in Section I.B.2 of the o
At least under Plaintiff's apparent theories of infringement and interpretations alleging that any of Defendant's accused products satisfy this claim limitation in combination with one or more references, discloses:
Roccatano at 688: "GEOMETRIC DECOMPOSITION The assignment of the atoms to the nodes is obtained by a dynamically geome such a way that the same number of atoms is assigned to each node. In what f decomposition for a bidimensional case; the extension to a third dimension is the bidimensional box of Figure 1a and a 2D parallel topology of $n = n_x x n_y$

 $n_y = 2$, the box is first divided into n_x boxes along the x-axis, as shown in Fig containing the same number of atoms. Each box is successively divided into n axis in such a way that each one of the $n_x = n_y$ boxes contains the same numb When, as in a real case, a third dimension exists, a successive division along t performed.

It is obvious that, before performing any division along a given axis, it is nece atoms of each box along that axis. The density of a molecular system, such as uniform; thus, the boxes do not have the same axis lengths. However, these de significantly reduce the efficiency of the GCA described in what follows."

Roccatano at Figure 1:

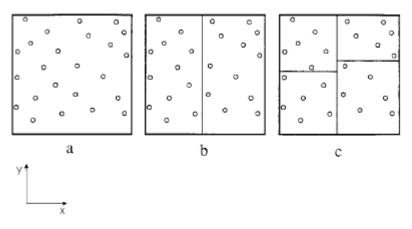


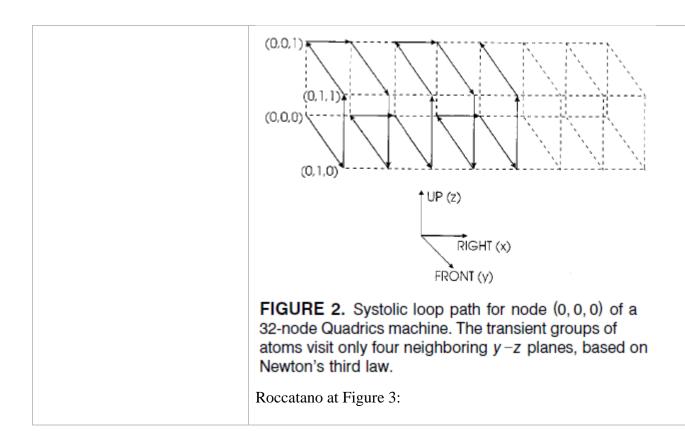
FIGURE 1. Domain decomposition of the molecular system in boxes with the same number of atoms, for a bidimensional case.

Roccatano at 688: "Quadrics topology makes it possible to use a systolic loop nonbonded interactions between the atoms assigned to the different nodes. Th is one of the most efficient algorithms for calculation of two-body interaction

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machines.14, 16, 24, 25 The systolic loop algorithm passes the coordinates of ring of P processors in P/2 steps, such that half of the coordinates passes ever once transient atoms. Each node also stores the coordinates of a group of atom system resident atoms. During the systolic cycle each processor evaluates and interactions of the resident atoms with the transient ones. Only half of the atom computational node as a consequence of the reciprocity of the interactions.
The systolic loop path for a 32-node Quadrics machine is shown in Figure 2. two nodes along the y and z directions and eight along the x direction.
The geometric decomposition of the system permits limitation of the search for interactions only to the neighboring processors nearer than the cut-off radius, the number of nodes and on the system size, it is generally not necessary to per- systolic loop. The computed forces are passed back to the owning processor to force."
Roccatano at Figure 2:

Exhibit F-12: Roccatano



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