

Declaration of Dr. Harold Stone Regarding U.S. Patent No. 7,620,800

Paper No. 1

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION.

Petitioner,

v.

SAINT REGIS MOHAWK TRIBE,

Patent Owner

Patent No. 7,620,800

Issued: November 17, 2009

Filed: April 9, 2007

Inventors: Jon M. Huppenthal, David E. Caliga

Title: MULTI-ADAPTIVE PROCESSING SYSTEMS AND
TECHNIQUES FOR ENHANCING PARALLELISM AND
PERFORMANCE OF COMPUTATIONAL FUNCTIONS

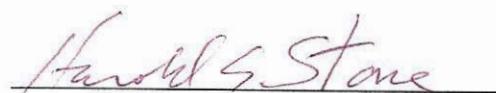
Inter Partes Review No. IPR2018-01607

DECLARATION OF DR. HAROLD STONE REGARDING U.S. PATENT
NO. 7,620,800

Declaration of Dr. Harold Stone Regarding U.S. Patent No. 7,620,800

I, Harold Stone, do hereby declare and state, that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, under Section 1001 of Title 18 of the United States Code.

Executed on: 9/5, 2018



Harold Stone

Declaration of Dr. Harold Stone Regarding U.S. Patent No. 7,620,800

TABLE OF CONTENTS

I.	INTRODUCTION	1
A.	Engagement	1
B.	Background and Qualifications.....	1
C.	Compensation and Prior Testimony	4
D.	Information Considered.....	6
II.	LEGAL STANDARDS FOR PATENTABILITY	7
A.	Anticipation	9
B.	Obviousness.....	10
III.	THE '800 PATENT	17
A.	Effective Filing Date	17
B.	Level of Ordinary Skill	17
C.	Overview of 800 Patent.....	18
D.	Prosecution History of 800 Patent.....	21
E.	Challenged Claims of the 800 Patent	23
F.	Claim Construction	26
1.	“functional unit”.....	27
2.	“data driven”	28

Declaration of Dr. Harold Stone Regarding U.S. Patent No. 7,620,800

3.	“transforming an algorithm into a data driven calculation”	29
4.	“form”	31
5.	“clusters of functional units”	34
6.	“data dimension”.....	35
7.	“seamlessly”.....	35
8.	“data mining”	37
9.	“genetic pattern matching function”	39
10.	“protein folding function”.....	40
11.	“organic structure interaction function”	41
12.	“data driven”	42
13.	“plane”.....	43
IV.	COMPARISON OF THE 800 PATENT TO THE PRIOR ART	46
A.	Buell et al, Splash 2, FPGAs in a Custom Computing Machine (1996) (“Splash2”) (EX1007)	46
1.	General Architecture of Splash 2	46
2.	Systolic Algorithms For Searching Genetic Databases	52
B.	The Challenged Claims Are Unpatentable.....	64
1.	Claim 1 is Unpatentable	69

Declaration of Dr. Harold Stone Regarding U.S. Patent No. 7,620,800

2.	Claim 2 is Unpatentable.....	131
3.	Claim 3 is Unpatentable.....	152
4.	Claim 4 is Unpatentable.....	153
5.	Claim 5 is Unpatentable.....	154
6.	Claims 8 and 9 Are Unpatentable	157
7.	Claim 15 is Unpatentable.....	181
8.	Claim 17 is Unpatentable.....	182
9.	Claim 18 is Unpatentable.....	205
10.	Claim 20 is Unpatentable.....	207
11.	Claim 21 is Unpatentable.....	231
12.	Claim 22 is Unpatentable.....	233
13.	Claim 23 is Unpatentable.....	265
14.	Claim 24 is Unpatentable.....	266
15.	Claim 7 is Unpatentable.....	268

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.