

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ADVANCED MICRO DEVICES, INC.
Petitioner

v.

AQUILA INNOVATIONS INC.,
Patent Owner

Case IPR2019-01526
Patent 6,895,519

**DECLARATION OF DAVID H. ALBONESI IN SUPPORT OF
PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE**

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

AMD EX1028

TABLE OF CONTENTS

I.	Introduction.....	1
II.	Overview of Patent Owner Response.....	3
III.	The references disclose the alleged missing elements.	4
A.	Ground 1: Ober in View of Nakazato	4
1.	Ober in view of Nakazato discloses a “plurality of ordinary operation modes.”	4
(a)	It would have been obvious to a POSITA to reduce the CPU clock frequency of Ober during “ordinary operations.”	7
(b)	Ober’s CPU is capable of operating at reduced clock speeds.....	11
2.	Ober in view of Nakazato discloses “a first memory that stores a clock control library for controlling a clock frequency transition between said ordinary operation modes.”	13
3.	A POSITA would have been motivated to combine Ober and Nakazato, and would have had a reasonable expectation of success.....	18
(a)	Ober is not limited to decentralized power management.....	19
(b)	Modifying Ober as proposed would have been well within the abilities of a person of ordinary skill in the art.	21
4.	A POSITA would have had a reasonable expectation of success modifying the unused bits of Ober’s SFR 62.	23
B.	Ground 2: Ober in view of Nakazato, Cooper and Windows ACPI...	25
1.	A POSITA would have been motivated to combine Ober with Windows ACPI.	25
2.	A POSITA would have found EX1005.	26
C.	Ground 3: Ober in view of Nakazato and Doblar	32
D.	The Dependent Claims are Unpatentable for the Reasons Set Forth in My Previous Declaration.....	33

IV. Conclusion34

I, David H. Albonesi, declare as follows:

I. Introduction

1. I have been asked by Advanced Micro Devices, Inc. (“AMD”) to provide expert opinions in the above-captioned *inter partes* review proceeding involving U.S. Patent No. 6,895,519 (“the ’519 patent”), which is entitled “System LSI.”

2. Specifically, I have been retained as a technical expert by AMD to study and provide my opinions on the technology claimed in, and the patentability or unpatentability of, claims 1-11 of the ’519 patent (“the Challenged Claims”). For purposes of this declaration, I was not asked to provide any opinions that are not expressed herein.

3. I previously submitted a declaration in support of the Petition for *inter partes* review of the ’519 patent. This declaration is in support of Petitioner’s Reply to Patent Owner’s Response in IPR2019-01526.

4. I understand that Patent Owner submitted a Response (Paper 19) (“POR”) and the declaration of Steven A. Przybylski in support of the POR (EX2005). I have also been asked to provide my technical review, analysis, and insight regarding both the POR and Mr. Przybylski’s declaration in support thereof.

Declaration of David H. Albonesi
U.S. Patent No. 6,895,519

5. My background and qualifications were provided in paragraphs 5-21 of my original declaration, Exhibit 1003, and my CV was provided as Exhibit 1009. My statements in my original declaration regarding my review of the '519 patent and related materials remain unchanged. In reaching my opinions, I carefully reviewed Patent Owner's Response, the Petition for *inter partes* review of the '519 patent, my original declaration, and the materials reviewed as part of my original declaration. In addition, I reviewed and refer to the following materials:

Exhibit	Description
1029	Deposition Transcript of Dr. Steven A. Przybylski, August 14, 2020.
1030	Internet Archive capture of http://www.microsoft.com , June 10, 2001 (accessed August 27, 2020).
1031	Internet Archive capture of http://www.microsoft.com/windows/default.asp , June 9, 2001 (accessed August 27, 2020).
1032	Internet Archive capture of http://www.microsoft.com/HWDev/ , June 11, 2001 (accessed August 27, 2020).

6. I have also reviewed all other materials cited herein.

7. I have also relied upon various legal principles (as explained to me by AMD's counsel) in formulating my opinions. My understanding of these principles was summarized in my original declaration and remain unchanged for the purposes of this declaration.

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.