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 U.S. Patent No. 6,895,519

#### PATENT OWNER'S SURREPLY TO PETITIONER'S REPLY



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I.		PETITIONER ABANDONED ITS ORIGINAL THEORY THAT OBER DISCLOSES A "PLURALITY OF ORDINARY OPERATION MODES."		
II.		REPLY CONFIRMS THAT THE COMBINATION DOES NOT RENDER CLAIMS OBVIOUS5		
	A.	Petitioner Admits That "Other Modifications" To Ober Are Necessary To Achieve The Claimed Invention		
	В.	Supplying the System Clock, By Itself, Does Not Disclose Ordinary Operation Modes		
	C.	Ober's "Low Speed Clocks" Is Not Ambiguous		
	D.	The Power Management State Machine Would Behave Unpredictably If Modified		
		1. Petitioner's Combination Would Cause System Timer Failures		
		2. Petitioner Does Not Show That Its Combination Would Not Cause Ober's State Machine To Act Predictably Or Stably		
	E.	Petitioner Does Not Rebut The Showing That Ober Teaches Away From Using Nakazato's Power-Saving Driver		
III.	PETITIONER HAS NOT SHOWN THAT OBER'S SYSTEM INADEQUATELY ADDRESSES SYSTEM CLOCK FAILURES			
IV	CONCLUSION 21			



#### TABLE OF AUTHORITIES

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#### PATENT OWNER'S UPDATED EXHIBIT LIST

Exhibit No.	Description
2001	Joint Claim Construction Statement dated May 17, 2019
2002	Revised Joint Claim Construction Statement dated November 1, 2019
2003	Markman Order re Infineon Technologies AG and Infineon Technology North America Corp. v. Atmel Corporation
2004	Email Correspondence with Board re Sur-Replies
2005	Declaration of Dr. Steven Przybylski
2006	Curriculum Vitae of Dr. Steven Przybylski
2007	MNSC140CORE Reference Manual
2008	ARM920T Technical Reference Manual
2009	DDI0275 ETB11 Technical Reference Manual
2010	Excerpts from CRC Modern Dictionary Electrical Engineering
2011	VDHL Coding Styles and Methodologies, 2nd Ed.
2012	Transcript of D Albonesi May 21 deposition
2013	Microsoft Computer Dictionary, 5th Ed.
2014	Graf Modern Dictionary of Electronics
2015	Declaration of Melanie Arlantico
2016 Not Filed	Library of Congress Catalog VHDL coding styles and methodologies, B Cohen, 2nd Ed.
2017	Copyright Catalog VHDL coding styles, B Cohen, 2nd Ed.
Not Filed	
2018	Copyright Catalog Comprehensive dictionary of electrical
Not Filed	engineering, 2nd Ed.
2019	Copyright Catalog Modern dictionary of electronics, R Graaf, 7th Ed.
Not Filed	
2020	Copyright Catalog Microsoft computer dictionary, 5th Ed.
Not Filed	Library of Congress Catalan Community and in the same of
2021 Not Filed	Library of Congress Catalog Comprehensive dictionary of electrical engineering, P Laplante, 2nd Ed.



Exhibit No.	Description
2022 Not Filed	Joint Claim Construction Statement with Attachment A, May 17, 2019
2023	Transcript of the September 28, 2020 deposition of David H. Albonesi



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