

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FLEX LOGIX TECHNOLOGIES INC.,

Petitioner

V.

VENKAT KONDA,

Patent Owner

Case PGR2020-00260

Patent 8,269,523 B2

**DECLARATION OF VIPIN CHAUDHARY, PH.D., IN SUPPORT OF
PATENT OWNER VENKAT KONDA'S REQUEST FOR REHEARING
UNDER 37 C.F.R. § 42.71(c)**

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	BACKGROUND AND QUALIFICATIONS.....	2
III.	MATERIALS CONSIDERED	5
IV.	THE LEVEL OF SKILL IN THE ART TO WHICH THE ‘523 PATENT PERTAINS AND THE TECHNICAL BACKGROUND FROM THE VIEWPOINT OF A POSITA AT THE TIME OF THE INVENTION	7
V.	THE ‘523 PATENT	9
VI.	PATENTABILITY OF THE ‘523 PATENT: PARTICULARLY THE EARLIEST EFFECTIVE FILING DATE OF THE ‘523 PATENT.....	10
VII.	CONCLUSION	16

I, Vipin Chaudhary, Ph.D., hereby declare and state as follows:

I. INTRODUCTION

1. My name is Vipin Chaudhary. I am submitting this declaration on behalf of Patent Owner Venkat Konda (“Patent Owner”) in support of Patent Owner’s Request for Rehearing Under 37 C.F.R. § 42.71(c) in *the inter partes* Review instituted in Case PGR2020-00260 filed by Petitioner Flex Logix Technologies Inc. (“Petitioner”) regarding claims 1, 15-18, 20-22, 32 and 47 (the “Challenged Claims”) of U.S. Patent No. 8,269,523 (Ex. 1001, “the ‘523 Patent”)

2. I have reviewed the ‘523 patent and its claims. I am a technical expert in the subject matter areas relevant to the ‘523 patent, including the field of integrated circuits and interconnection networks. I have been asked to consider the validity of the claims of the ‘523 patent. I have read and understood the content of each of the publications referenced in the Petition filed by Petitioner on December 16, 2019 (“Petition”). I have read and understood the ‘523 Patent and claims 1-48 of the ‘523 patent. This declaration provides my expert opinion regarding the subject matter addressed below.

3. This declaration is based on the information currently available to me. To the extent that additional information becomes available, I reserve the right to continue my investigation and study, which may include review of documents and

information that may be produced, as well as testimony from depositions that have not yet been taken.

II. BACKGROUND AND QUALIFICATIONS

4. A copy of my curriculum vitae (“CV”), which fully describes my qualifications as an expert in this matter, is found at Exhibit 2026. In addition, I have set forth some of my qualifications in the paragraphs below that may be particularly relevant here. I am over 18 years of age and, if I am called upon to do so, I would be competent to testify as to the matters set forth herein.

5. I hold a Bachelor Degree (Hons.) in Computer Science and Engineering from the Indian Institute of Technology, Kharagpur, India awarded in 1986, and the MS degree in Computer Science in 1989 and the Ph.D. degree in Electrical and Computer Engineering in 1992, both from The University of Texas at Austin.

6. Currently I am the Endowed Kranzusch Professor and Inaugural Chair, Department of Computer and Data Sciences, Case School of Engineering, Case Western Reserve University, Cleveland, Ohio. Prior to this position, I was a SUNY Empire Innovation Professor between 2011 and 2020 and SUNY Empire Innovation Associate Professor between 2006 and 2011, Computer Science and Engineering at University at Buffalo, The State University of New

York. Between June 2016 and June 2020, I was also a Program Director at the Office of Advanced Cyber Infrastructure, Directorate for Computer and Information Science and Engineering, National Science Foundation, Alexandria, Virginia. Prior to the University at Buffalo, I was an Associate Professor, Department of Computer Science, and an Associate Professor, Department of Electrical and Computer Engineering at Wayne State University, Detroit, Michigan between 1998 and 2006, and an Assistant Professor, Department of Electrical and Computer Engineering, Wayne State University between 1992 and 1998.

7. I have been active in the field of integrated circuits and interconnection networks for over 30 years, since my Ph.D. Dissertation, awarded in 1992, in the area of parallel and distributed computing where interconnection networks is a major part of my dissertation.

8. I have received numerous awards for my work, including the 2019 National Science Foundation Director's Superior Accomplishment Award for my contributions where as a Program Director I co-led the National Strategic Computing Initiative from NSF for the United States and in the working groups of the Quantum Leap Initiative, National Quantum Initiative, National Artificial Intelligence Research Institutes, Cyber, and the I-Corps Program. The I-Corps program is now part of "The American Innovation and Competitiveness Act" that enables commercialization of research and venture startups. The U.S. National

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