UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEL CORPORATION,
Petitioner,

v.

FG SRC LLC,
Patent Owner.

IPR2020-01449
Patent No. 7,149,867

PATENT OWNER'S OBJECTIONS TO PETITIONER EXHIBITS 1003, 1004 AND 1005

LIST OF EXHIBITS

Exhibit No.	Descriptions
2001	Declaration of Dr. Vojin Oklobdzija
2002	Cray, Britannica Online Encyclopedia
2003	Declaration of Brandon Freeman dated 10/25/18 *SRC Labs LLC and Saint Regis Mohawk Tribe v. Microsoft Corporation,* No. 2:18-cv-00321-JLR, Dkt. 125 (W.D. Wash. Oct. 25, 2018)
2004	Plaintiff's Original Complaint For Patent Infringement in *FG SRC LLC v. Intel Corp.*, No. 6:20-cv-00315-ADA (W.D. Texas), filed April 24, 2020
2005	Plaintiff's First Amended Complaint For Patent Infringement in *FG SRC LLC v. Intel Corp.*, No. 6:20-cv-00315-ADA (W.D. Texas), filed April 24, 2020
2006	Declaration of Mark Wollgast dated 09/10/18 *Xilinx, Inc. v. Saint Regis Mohawk Tribe,* IPR2018-0195
2007	COTS Journal, UAVs Lead Push for Embedded Supercomputing
2008	Press Release: SRC Computers Chosen by Lockheed Martin for U.S. Army Program
2009	Declaration of Henning Schmidt
2009-1	Declaration of Henning Schmidt, Exhibit A, IEEE Xplore: Advanced Search
2009-2	Declaration of Henning Schmidt, Exhibit B, IEEE Xplore: Advanced Search Results
2010	Declaration Of Ryan Kastner, Ph.D. In Support Of FG SRC LLC's Opening Claim Construction Brief in *FG SRC LLC v. Intel Corp.*, No. 6:20-cv-00315-ADA (W.D. Texas), filed April 24, 2020
2011	Peter McMahon, High Performance Reconfigurable Computing for Science and Engineering Applications (Thesis Oct. 2006).
2012	Caliga, Delivering Acceleration: The Potential for Increased HPC Application Performance Using Reconfigurable Logic
2013	D. A. Buell, D. Caliga, J. P. Davis, G. Quan, "The DARPA boolean equation benchmark on a reconfigurable computer," Proceedings of the Military and Aerospace Programmable Logic Devices (MAPLD) Conference, Washington, DC, 8-10 September

Exhibit No.	Descriptions
	2004
2014	El-Araby, The Promise of High-Performance Reconfigurable Computing
2015	FG SRC LLC's Opening Claim Construction Brief in *FG SRC LLC v. Intel Corp.*, No. 6:20-cv-00315-ADA (W.D. Texas), filed April 24, 2020
2016	*Kerr Machine Co. d/b/a Kerr Pumps v. Vulcan Industrial Holdings, LLC*, No. 6:20-cv-00200, Text Order dated Aug. 2, 2020 (W.D. Tex.)
2017	*MultiMedia Content Mgmt LLC v. Dish Network L.L.C.*, No. 6:18-cv-00207, Dkt. 73 (W.D. Tex.)
2018	*Solas OLED v. Dell Techs. Inc.*, No. 6:19-cv-00514, Text Order dated June 23, 2020
2019	*Kerr Machine Co. v. Vulcan Indus. Holdings, LLC*, No. 6:20-cv-200, Dkt. 28 (W.D. Tex. July 31, 2020)
2020	*Kerr Machine Co. v. Vulcan Indus. Holdings, LLC*, No. 6:20-cv-200, Dkt. 24 (W.D. Tex. June 14, 2020)
2021	*Kerr Machine Co. v. Vulcan Indus. Holdings, LLC*, No. 6:20-cv-200, Dkt. 12 (W.D. Tex., June 14, 2020)
2022	Email from J. Yi to Counsel (Aug. 3, 2020)
2023	FG SRC LLC v. Intel Corp., No. 1:20-cv-00834, Dkt. 48 (W.D. Tex. Nov. 23, 2020) (Amended Schedule)
2024	*Continental Intermodal Group - Trucking LLC v. Sand Revolution LLC*, No. 7:18-cv-00147, Text Order dated July 22, 2020 (W.D. Tex.)
2025	*Solas OLED v. Dell Techs. Inc.*, No. 6:19-cv-00515, Text Order dated Jun. 23, 2020
2026	2019-07-11 - DirectStream MSFT - Huppenthal Declaration

Pursuant to 37 C.F.R. § 42.2, Patent Owner FG SRC LLC ("Patent Owner") hereby objects to exhibits submitted and relied on by Petitioner Intel Corporation ("Petitioner") in its Petition and by the Board in its Institution Decision issued on March 3, 2021. *See* Paper 13. Patent Owner's objections are being presented within 10 business days of issuance of the Institution Decision and are therefore timely. *See* 37 C.F.R. § 42.2. As set forth further below, Patent Owner objects to Petitioner Exhibits 1003, 1004 and 1005 as not being properly authenticated as required by the Board's rules and the Federal Rules of Evidence. 37 C.F.R. § 42.62; Fed. R. Evid. 901.

I. BACKGROUND

In its Petition, Petitioner asserts three references, submitted as Exhibits 1003-1005, each of which is a non-patent reference that must qualify as a printed publication. Paper 1 at 10. Exhibit 1003 ("*Zhang*") purports to be a paper entitled *Architectural Adaptation for Application-Specific Locality Optimizations*, the lead author of which was Xingbin Zhang. The *Zhang* reference was purportedly published in the Proceedings of the International Conference on Computer Design – VLSI in Computers and Processors ("VLSI '97 Conference"). *Id*. Exhibit 1004 ("*Gupta*") purports to be a paper entitled *Architectural Adaptation in AMRM Machines*, the lead author of which is Rajesh Gupta. The *Gupta* reference was purportedly published in the Proceedings of the IEEE Computer Society Workshop

on VLSI 2000 ("VLSI '00 Conference"). *Id.* Exhibit 1005 ("*Chien*") purports to be a paper entitled *MORPH: A System Architecture for Robust High Performance Using Customization (An NSF 100 TeraOps Point Design Study)*, the lead author of which is Andrew A. Chien. The *Chien* reference was purportedly published in the Proceedings of Frontiers '96 – The Sixth Symposium on the Frontiers of Massively Parallel Computing ("Frontiers '96 Conference").

For each reference, Petitioner relies on the testimony of Dr. Rajesh K. Gupta (Exhibit 1010) and Jacob Robert Munford (Exhibit 1012) to authenticate the reference. For each reference Dr. Gupta states that he "believe[s]" the reference was distributed at the particular conference, that he "understand[s]" the reference was made available on the IEEE Xplore website, and that it was published in a collection of conference proceedings in the relevant year. Exhibit 1010, ¶¶ 18-20 (regarding *Chien*), ¶¶ 21-23 (regarding *Zhang*), and ¶¶ 24-26 (regarding *Gupta*).

Mr. Munford relies solely on a search of online records at various libraries using the full name of the conference to which the asserted reference pertains. Exhibit 1012, ¶¶ 15-20 (regarding *Zhang*), ¶¶ 21-26 (regarding *Gupta*), ¶¶ 27-32 (regarding *Chien*). Mr. Munford did not state that he is familiar with the specific practices of any of the identified libraries and he did not review a physical copy of any reference at the libraries he searched. *Id.*, ¶ 14.

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