

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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INTEL CORPORATION and XILINX, INC.,<sup>1</sup>

Petitioners,

v.

FG SRC LLC,

Patent Owner

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CASE NO.: IPR2020-01449  
PATENT NO. 7,149,867

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**PETITIONERS' REPLY TO PATENT OWNER'S RESPONSE TO  
PETITION**

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<sup>1</sup> Xilinx, Inc. filed a motion for joinder and petition in IPR2021-00633, which was granted, and, therefore has been joined as petitioner in this proceeding.

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Exhibit No.	Description
<b>Exhibit 1001</b>	U.S. Patent No. 7,149,867 to Daniel Poznanovic, <i>et al.</i> , filed June 16, 2004, and issued on December 12, 2006 (the “’867 patent”).
<b>Exhibit 1002</b>	Prosecution history of the ’867 patent.
<b>Exhibit 1003</b>	X. Zhang et al., <i>Architectural Adaptation of Application-Specific Locality Optimizations</i> , IEEE (1997) (“ <b>Zhang</b> ”). <sup>2</sup>
<b>Exhibit 1004</b>	R. Gupta, <i>Architectural Adaptation in AMRM Machines</i> , IEEE (2000) (“ <b>Gupta</b> ”).
<b>Exhibit 1005</b>	A. Chien and R. Gupta, <i>MORPH: A System Architecture for Robust Higher Performance Using Customization</i> , IEEE (1996) (“ <b>Chien</b> ”).
<b>Exhibit 1006</b>	Declaration of Stanley Shanfield, Ph.D.
<b>Exhibit 1007</b>	RESERVED
<b>Exhibit 1008</b>	RESERVED
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<b>Exhibit 1010</b>	Declaration of Rajesh K. Gupta
<b>Exhibit 1011</b>	Chien et al., <i>Safe and Protected Execution for the Morph/AMRM Reconfigurable Processor</i> , IEEE (1999).
<b>Exhibit 1012</b>	Declaration of Jacob Munford
<b>Exhibit 1013</b>	RESERVED
<b>Exhibit 1014</b>	Order Governing Proceedings - Patent Case by Judge Alan D Albright, filed on June 30, 2020 in <i>FG SRC LLC v. Intel Corporation</i> , No. 6:20-cv-00315-ADA (W.D. Tex.)
<b>Exhibit 1015</b>	Scheduling Order by Judge Alan D Albright, filed on August 1, 2020 in <i>FG SRC LLC v. Intel Corporation</i> , No. 6:20-cv-00315-ADA (W.D. Tex.)

<sup>2</sup> For ease of reference and citation, Petitioner has added line numbers to Exhibits 1003, 1004, 1005 and 1011. For example, the citation “EX1003-15 C2:4-16” refers to Exhibit 1003, Page 15, Column 2, Lines 4-16, and the subsequent citation “*id.*-12 C1:12-C2:5” refers to Exhibit 1003, Page 12, Column 1, Line 12 through Column 2, Line 5.

<b>Exhibit No.</b>	<b>Description</b>
<b>Exhibit 1016</b>	Plaintiffs SRC Labs, LLC & Saint Regis Mohawk Tribe's Opening Claim Construction Brief, filed on November 5, 2018 in <i>SRC Labs, LLC et al. v. Amazon Web Services, Inc. et al.</i> , No. 2:18-cv-00317-JLP (W.D. Was.)
<b>Exhibit 1017</b>	Provisional Patent Application No. 60/479,339
<b>Exhibit 1018</b>	Plaintiff's Preliminary Infringement Contentions, submitted on July 23, 2020 in <i>FG SRC LLC v. Intel Corporation</i> , No. 6:20-cv-00315-ADA (W.D. Tex.)
<b>Exhibit 1019</b>	Amended Scheduling Order by Judge Alan D Albright, filed on December 18, 2020 in <i>UNM Rainforest Innovations v. Dell Technologies et al.</i> , No. 6:20-cv-00468-ADA (W.D. Tex.)
<b>Exhibit 1020</b>	Docket Sheet from <i>UNM Rainforest Innovations v. Dell Technologies et al.</i> , No. 6:20-cv-00468-ADA (W.D. Tex.)
<b>Exhibit 1021</b>	Scheduling Order by Judge Alan D Albright, filed on November 19, 2020 in <i>Theta IP, LLC v. Samsung Electronics Co., Ltd. et al.</i> , No. 6:20-cv-00160-ADA (W.D. Tex.)
<b>Exhibit 1022</b>	Agreed Post-Markman Scheduling Order by Judge Alan D Albright, filed on December 3, 2020 in <i>Videoshare, LLC v. Google LLC and YouTube, LLC</i> , No. 6:19-cv-00663-ADA (W.D. Tex.)
<b>Exhibit 1023</b>	Docket Sheet from <i>H-E-B, LP v. Wadley Holdings, LLC, dba nICE Coolers et al.</i> , No. 6:20-cv-00081-ADA (W.D. Tex.)
<b>Exhibit 1024</b>	Western District of Texas Order by Chief Judge Orlando L. Garcia regarding Court Operations Under the Exigent Circumstances Created by the COVID-19 Pandemic, filed on March 13, 2020 in all cases.
<b>Exhibit 1025</b>	Western District of Texas Eleventh Supplemental Order by Chief Judge Orlando L. Garcia Regarding Court Operations Under the Exigent Circumstances Created by the COVID-19 Pandemic, filed on December 10, 2020 in all cases.
<b>Exhibit 1026</b>	December 23, 2020 email from H. Santasawatkul to Counsel
<b>Exhibit 1027</b>	Declaration of Gordon MacPherson
<b>Exhibit 1028</b>	Declaration of Eileen D. McCarrier
<b>Exhibit 1029</b>	Declaration of Austin M. Schnell

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