### 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 FG SRC LLC'S REVISED MOTION TO AMEND



# **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 <i>FG SRC LLC v. Intel Corp.</i> , 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 2004



Exhibit No.	Descriptions
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),
2016	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
2017	(W.D. Tex.)  MultiMedia Content Mant II C.v. Dish Naturals II C. No. 6:18
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
2027	Declaration of William Mangione-Smith, Ph.D., In Support of FG
	SRC LLC's Motion to Amend
2028	Declaration of Dr. William Mangione-Smith in support of Patent
	Owner Response
2029	Deposition Transcript of Dr. Stanley Shanfield
2030	Declaration of William Mangione-Smith, Ph.D., In Support of FG
	SRC LLC's Revised Motion to Amend



## **TABLE OF CONTENTS**

I.	INT	INTRODUCTION		
II.	A REASONABLE NUMBER OF CLAIMS ARE AMENDED.			
III.	PRO	POSED AMENDED CLAIMS ARE PATENTABLE	3	
	A.	Proposed Amended Claim 20 (Amending Original Claim 1)	5	
	A.	Proposed Amended Claim 21 (Amending Claim 1)	10	
	B.	Proposed Amended Claim 28 (Replacing Claim 9)	11	
	C.	Proposed Amended Claim 32 (Replacing Claim 13)	14	
IV.	CONCLUSION			
APP	ENDI	X A	18	

## **TABLE OF AUTHORITIES**

## **CASES:**

Aqua Products, Inc. v. Matal, , 872 F.3d 1290 (Fed. Cir. 2017)
<i>Ariad Pharms., Inc. v. Eli Lilly &amp; Co.,</i> , 598 F.3d 1336 (Fed. Cir. 2010)
ADMINISTRATIVE ORDERS:
Compliance v. Testing, Case IPR2020-00923, 2021 WL 1833328, at *2 (P.T.A.B. May 7, 2021)3
Lectrosonics, Inc. v. Zaxcom, Inc., IPR2018-01129, Paper 15 (PTAB, February 25, 2019)2, 4, 6
<i>Nichia Corp. v. Emcore Corp.</i> , IPR2012-00005, Paper 27 (PTAB June 3, 2013)
STATUTES:
35 U.S.C. § 101
35 U.S.C. § 103
35 U.S.C. § 1125
35 U.S.C. § 316
REGULATIONS:
37 C.F.R. § 42.121



# DOCKET A L A R M

# 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.

