

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEL CORPORATION and XILINX, INC.¹,
Petitioners,

v.

FG SRC LLC,
Patent Owner.

IPR2020-01449
Patent No. 7,149,867

**PATENT OWNER'S SUR-REPLY TO
PETITIONERS' REPLY TO PATENT OWNER RESPONSE**

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

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 <i>SRC Labs LLC and Saint Regis Mohawk Tribe v. Microsoft Corporation</i> , 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 <i>FG SRC LLC v. Intel Corp.</i> , No. 6:20-cv-00315-ADA (W.D. Texas), filed April 24, 2020
2006	Declaration of Mark Wollgast dated 09/10/18 <i>Xilinx, Inc. v. Saint Regis Mohawk Tribe</i> , 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 <i>FG SRC LLC v. Intel Corp.</i> , 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 <i>FG SRC LLC v. Intel Corp.</i> , No. 6:20-cv-00315-ADA (W.D. Texas), filed April 24, 2020
2016	<i>Kerr Machine Co. d/b/a Kerr Pumps v. Vulcan Industrial Holdings, LLC</i> , No. 6:20-cv-00200, Text Order dated Aug. 2, 2020 (W.D. Tex.)
2017	<i>MultiMedia Content Mgmt LLC v. Dish Network L.L.C.</i> , No. 6:18-cv-00207, Dkt. 73 (W.D. Tex.)
2018	<i>Solas OLED v. Dell Techs. Inc.</i> , No. 6:19-cv-00514, Text Order dated June 23, 2020
2019	<i>Kerr Machine Co. v. Vulcan Indus. Holdings, LLC</i> , No. 6:20-cv-200, Dkt. 28 (W.D. Tex. July 31, 2020)
2020	<i>Kerr Machine Co. v. Vulcan Indus. Holdings, LLC</i> , No. 6:20-cv-200, Dkt. 24 (W.D. Tex. June 14, 2020)
2021	<i>Kerr Machine Co. v. Vulcan Indus. Holdings, LLC</i> , No. 6:20-cv-200, Dkt. 12 (W.D. Tex., June 14, 2020)
2022	Email from J. Yi to Counsel (Aug. 3, 2020)
2023	<i>FG SRC LLC v. Intel Corp.</i> , No. 1:20-cv-00834, Dkt. 48 (W.D. Tex. Nov. 23, 2020) (Amended Schedule)
2024	<i>Continental Intermodal Group - Trucking LLC v. Sand Revolution LLC</i> , No. 7:18-cv-00147, Text Order dated July 22, 2020 (W.D. Tex.)
2025	<i>Solas OLED v. Dell Techs. Inc.</i> , 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

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CASES

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<i>PAR Pharm., Inc. v. TWI Pharms., Inc.</i> , 773 F.3d 1186 (Fed. Cir. 2014).....	11

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