

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
REPLY IN SUPPORT OF 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 <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	FG SRC LLC v. Intel Corp., 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

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	A REASONABLE NUMBER OF CLAIMS ARE AMENDED.	1
A.	In Light Of The Board’s Findings Regarding The Original Claims And The Proposed Amended Claims, Patent Owner’s Revised Proposed Amended Claims Are Needed.....	1
III.	THE PROPOSED AMENDED CLAIMS DO NOT INTRODUCE NEW SUBJECT MATTER.....	3
IV.	THE PROPOSED AMENDED CLAIMS ARE PATENTABLE.....	4
A.	Proposed Amended Claim 20 (Replacing Original Claim 1)	4
B.	Proposed Amended Claim 21 (Replacing Claim 1).....	7
C.	Proposed Amended Claim 28 (Replacing Claim 9).....	9
D.	Proposed Amended Claim 32 (Replacing Claim 13).....	11
V.	CONCLUSION	12
	APPENDIX A – COMPARISON OF CLAIMS 20 AND 21	16
	APPENDIX B - PROPOSED AMENDED CLAIM 20.....	17
	APPENDIX C – PROPOSED AMENDED CLAIM 21	18
	APPENDIX D – PROPOSED AMENDED CLAIM 28	19
	APPENDIX E – PROPOSED AMENDED CLAIM 32	20

TABLE OF AUTHORITIES

CASES:

<i>Aqua Products, Inc. v. Matal</i> , , 872 F.3d 1290 (Fed. Cir. 2017)	4
<i>Ariad Pharms., Inc. v. Eli Lilly & Co.</i> , , 598 F.3d 1336 (Fed. Cir. 2010)	3

ADMINISTRATIVE ORDERS:

<i>Compliance v. Testing</i> , Case IPR2020-00923, 2021 WL 1833328, at *2 (P.T.A.B. May 7, 2021)	3
<i>Lectrosonics, Inc. v. Zaxcom, Inc.</i> , 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).....	3

STATUTES:

35 U.S.C. § 101	5
35 U.S.C. § 103	5, 8, 11
35 U.S.C. § 112	5
35 U.S.C. § 316	2

REGULATIONS:

37 C.F.R. § 42.121	1
37 C.F.R. § 42.24 (a)(1)(vi)	5

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.