Paper No. 50 Filed: December 22, 2021

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

PETITIONER'S SUR-REPLY IN OPPOSITION TO PATENT OWNER'S REVISED MOTION TO AMEND

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



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TABLE OF EXHIBITS

Exhibit No.	Description
Exhibit 1001	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").
Exhibit 1002	Prosecution history of the '867 patent.
Exhibit 1003	X. Zhang et al., Architectural Adaptation of Application-Specific Locality Optimizations, IEEE (1997) ("Zhang").
Exhibit 1004	R. Gupta, Architectural Adaptation in AMRM Machines, IEEE (2000) ("Gupta").
Exhibit 1005	A. Chien and R. Gupta, MORPH: A System Architecture for Robust Higher Performance Using Customization," IEEE (1996) ("Chien").
Exhibit 1006	Declaration of Stanley Shanfield, Ph.D.
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Exhibit 1008	RESERVED
Exhibit 1009	RESERVED
Exhibit 1010	Declaration of Rajesh K. Gupta
Exhibit 1011	Chien et al., Safe and Protected Execution for the Morph/AMRM Reconfigurable Processor, IEEE (1999).
Exhibit 1012	Declaration of Jacob Munford
Exhibit 1013	RESERVED
Exhibit 1014	Order Governing Proceedings - Patent Case by Judge Alan D Albright, filed on June 30, 2020 in FG SRC LLC v. Intel Corporation, No. 6:20-cv-00315-ADA (W.D. Tex.)
Exhibit 1015	Scheduling Order by Judge Alan D Albright, filed on August 1, 2020 in FG SRC LLC v. Intel Corporation, No. 6:20-cv-00315-ADA (W.D. Tex.)



Exhibit No.	Description
Exhibit 1016	Plaintiffs SRC Labs, LLC & Saint Regis Mohawk Tribe's Opening Claim Construction Brief, filed on November 5, 2018 in SRC Labs, LLC et al. v. Amazon Web Services, Inc. et al., No. 2:18-cv-00317-JLP (W.D. Was.)
Exhibit 1017	Provisional Patent Application No. 60/479,339
Exhibit 1018	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.)
Exhibit 1019	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.)
Exhibit 1020	Docket Sheet from <i>UNM Rainforest Innovations v. Dell Technologies et al.</i> , No. 6:20-cv-00468-ADA (W.D. Tex.)
Exhibit 1021	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.)
Exhibit 1022	Agreed Post- <i>Markman</i> Scheduling Order by Judge Alan D Albright, filed on December 3, 2020 in <i>Videoshare</i> , <i>LLC v. Google LLC and Youtube</i> , <i>LLC</i> , No. 6:19-cv-00663-ADA (W.D. Tex.)
Exhibit 1023	Docket Sheet from H-E-B, LP v. Wadley Holdings, LLC, dba nICE Coolers et al., No. 6:20-cv-00081-ADA (W.D. Tex.)
Exhibit 1024	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.
Exhibit 1025	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.
Exhibit 1026	December 23, 2020 email from H. Santasawatkul to Counsel
Exhibit 1027	Declaration of Gordon MacPherson
Exhibit 1028	Declaration of Eileen D. McCarrier



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