

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

INTEL CORPORATION,

Petitioner

v.

FG SRC LLC,

Patent Owner

---

CASE NO.: IPR2020-01449

PATENT NO. 7,149,867

---

**PETITIONER'S REPLY TO PRELIMINARY RESPONSE**

Mail Stop **PATENT BOARD**  
Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

## TABLE OF CONTENTS

	Page
I. THE <i>FINTIV</i> FACTORS DO NOT FAVOR DENYING INSTITUTION .....	1
II. THE ASSERTED PRIOR ART ARE PRINTED PUBLICATIONS .....	2
III. PO MISCHARACTERIZES THE '867 PATENT AND PRIOR ART.....	4
IV. NO NEXUS SUPPORTS SECONDARY CONSIDERATIONS .....	7

## TABLE OF AUTHORITIES

Page(s)

### Cases

<i>Fox Factory, Inc. v. SRAM, LLC</i> , 944 F.3d 1366 (Fed. Cir. 2019) .....	7
<i>In re Hall</i> , 781 F.2d 897 (Fed. Cir. 1986) .....	4
<i>In re Lister</i> , 583 F.3d 1307 (Fed. Cir. 2009) .....	3
<i>Medtronic, Inc. v. Barry</i> , 891 F.3d 1368 (Fed. Cir. 2018) .....	4
<i>Wyers v. Master Lock Co.</i> , 616 F.3d 1231 (Fed. Cir. 2010) .....	7

### Administrative Proceedings

<i>Cizion, LLC d/b/a Vulcan Industrial Manufacturing v. Kerr Machine Co.</i> (“Cizion”), PGR2020-00065, Paper 10 (PTAB Dec. 3, 2020) .....	1, 2
<i>Hulu, LLC v. Sound View Innovations, LLC</i> (“Hulu”), IPR2018-01039, Paper 29, at 8 (PTAB Precedential Panel Dec. 20, 2019) .....	3
<i>Laboratory Corporation of America Holdings v. Quest Diagnostics Investments LLC</i> (“Quest”), IPR2019-00738, Paper 14 (Sept. 4, 2019) .....	3, 5, 6, 7
<i>Micron Tech., Inc. v. Good Kaisha IP Bridge 1</i> (“Micron”), IPR 2020-01009, Paper 8 at 9–10 (PTAB Dec. 7, 2020) .....	1
<i>Snap, Inc., v. SRK Technology LLC</i> (“Snap”), IPR2020-00820, Paper 15 at 10 (PTAB Oct. 21, 2020) .....	2

*Unified Patents v. NavBlazer LLC* (“*Unified Patents*”), IPR2020-00983,  
Paper 11 at 6 (PTAB Dec. 6, 2020)..... 1

## TABLE OF EXHIBITS

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>1</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
<b>Exhibit 1009</b>	RESERVED
<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

---

<sup>1</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.

# 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.