

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

DECLARATION OF HENNING SCHMIDT

I, Henning Schmidt, declare as follows:

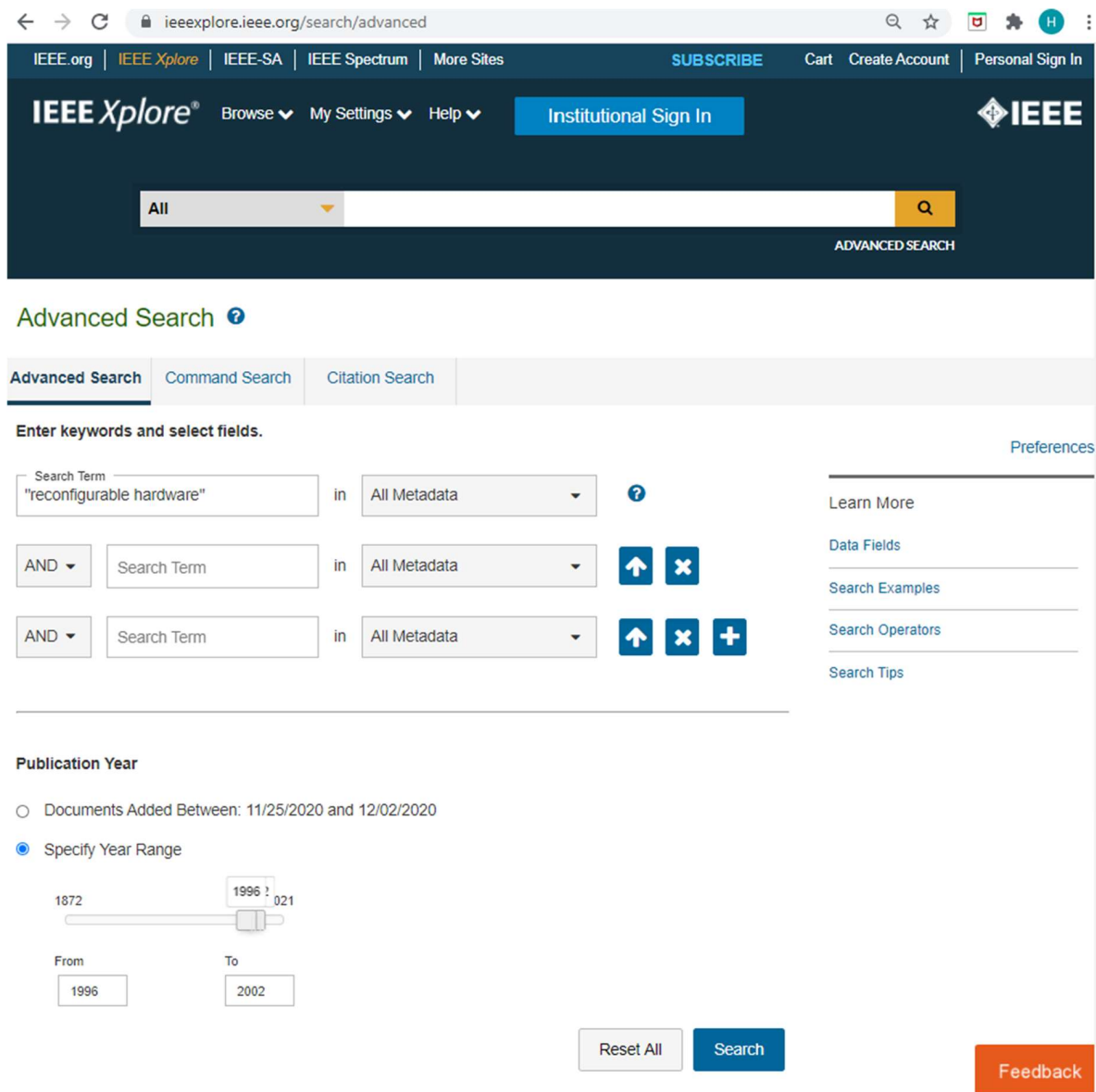
1. I am an attorney with DiMuroGinsberg, P.C.-DGKeyIP Group, counsel of record for Patent Owner FG SRC LLC (“Patent Owner”) in the above-captioned *Inter Partes* Review (“IPR”).

2. I submit this declaration in support of Patent Owner’s Preliminary Response being filed concurrently herewith. I make this declaration on my personal knowledge and belief. I am over the age of 18 and am competent to testify as to the statements herein if called to do so.

3. On December 4, 2020, I accessed the webpage located at <https://ieeexplore.ieee.org>, which is also accessible through the home page of the

IEEE website located at <https://www.ieee.org>. The webpage that I accessed is the “IEEE Xplore website” identified in the Declaration of Rajesh K. Gupta, Ph.D. submitted in the above-captioned IPR (“Gupta Declaration”). *See* Ex. 1010-1, ¶¶ 19, 22, 25.

4. On the IEEE Xplore website, I chose the “Advanced Search” option. On the “Advanced Search” page, located at <https://ieeexplore.ieee.org/search/advanced>, I entered the term “reconfigurable hardware” in the “Search Term” window and specified the date range from 1996 to 2002 in the “Specify Year Range” option under the “Publication Year” heading. Below is a true and correct copy of the screen shot of the “Advance Search” with the above parameters entered.



A true and correct copy of the Advanced Search page showing the search terms as printed to PDF is also enclosed as **Exhibit 2009-1**.

5. The search yielded 202 results from the search of “reconfigurable hardware” in “All Metadata” as shown by the below true and correct copy of the screenshot of the search results.

The screenshot shows the IEEE Xplore search interface. At the top, there are navigation links for IEEE.org, IEEE Xplore, IEEE-SA, IEEE Spectrum, and More Sites. There are also links for SUBSCRIBE, Cart, Create Account, and Personal Sign In. The main search bar contains the text "All" and a search icon. Below the search bar, it says "Showing 1-25 of 202 for ('All Metadata': 'reconfigurable hardware') *". There are filters for "Filters Applied: 1996 - 2002 *", "Conferences (182)", "Journals (17)", and "Magazines (3)". The results are sorted by "Relevance". Three results are visible:

- Hardware Join Java: a high level language for reconfigurable hardware development** by J. Hopf, G.S. Itzstein, D. Kearney. 2002 IEEE International Conference on Field-Programmable Technology, 2002. (FPT). Proceedings. Year: 2002 | Conference Paper | Publisher: IEEE. Cited by: Papers (4). Abstract (275 Kb).
- A SAT solver using software and reconfigurable hardware** by I. Skliarova, A.B. Ferrari. Proceedings 2002 Design, Automation and Test in Europe Conference and Exhibition. Year: 2002 | Conference Paper | Publisher: IEEE. Cited by: Papers (1). Abstract (187 Kb).
- A prototype system for rapid application development using dynamically reconfigurable hardware** by J.C. Ferreira, J.S. Matos. Proceedings. IEEE Symposium on FPGAs for Custom Computing Machines (Cat. No. 98TB100251). Year: 1998 | Conference Paper | Publisher: IEEE. Abstract (38 Kb).

On the right side of the page, there are two promotional banners: "Need Full-Text access to IEEE Xplore for your organization? CONTACT IEEE TO SUBSCRIBE" and "WORKING FROM HOME? Logging in to your organization's subscription while working remotely? Try these tips to access IEEE Xplore Digital Library".

A true and correct copy of the complete search results as printed to PDF is also enclosed as **Exhibit 2009-2**.

6. I reviewed the results reflected in Exhibit 2009-2 in an effort to identify the three references identified in the Gupta Declaration as being available on the IEEE Explore website. Those three references are *MORPH: A System Architecture for Robust Higher Performance Using Customization* (Exhibit 1005), *Architectural Adaptation of Application-Specific Locality Optimizations* (Exhibit 1003), and *Architectural Adaptation in AMRM Machines* (Exhibit 1004). See Exhibit 1010, ¶¶

20, 23, 26. This review included text searching of the results using the terms “MORPH: A System Architecture,” “Architectural Adaptation,” and “AMRM.”

7. None of the references identified in the Gupta Declaration as being available on the IEEE Xplore website were identified through the searches I conducted and have described above.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Date: December 4, 2020


Henning Schmidt

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