UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LzLabs GmbH,

Petitioner

v.

INTERNATIONAL BUSINESS MACHINES CORPORATION

Patent Owner

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IPR2023-00274
Patent 8,713,289

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DECLARATION OF IAN JESTICE PERTAINING TO PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO. 8,713,289

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1. Claim element 1[a1]: "1. A computer program product for emulating computer instructions from a source machine to produce sequences of instructions on a target machine, said computer program product comprising:" 44

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2. Claim element 1[a2]: "a non-transitory computer readable storage medium readable by a processor and storing instructions for execution by the processor for performing a method comprising:" 46

3. Claim element 1[b]: "obtaining by the target machine a computer instruction from the source machine, said source machine having a different architecture from said target machine; and" 47

4. Claim element 1[c]: "generating a sequence of target machine instructions which together operate to derive an encoding for a target machine condition code for the computer instruction, wherein the sequence of target machine instructions provides distinguishing information to distinguish between a plurality of possible outcomes for the target machine condition code, and" 51

5. Claim element 1[d]: "directly calculates the target machine condition code without using branch instructions, the directly calculating comprising:" 56

6. Claim element 1[e]: "determining an intermediate condition code value, the intermediate condition code value being a provisional value for the target machine condition code and subject to change based on the distinguishing information; and". 58

7. Claim element 1[f]: "determining, based on the intermediate condition code value and based on the distinguishing information, the target machine condition code, wherein at least part of said distinguishing information is separate from the intermediate condition code value." 60

C. Claim 4: "The computer program product of claim 1, wherein said method further includes executing said generated sequence of target machine instructions" 62

D. Claim 6: "The computer program product of claim 1, wherein the sequence of target machine instructions together operate to directly calculate the target machine condition code using at least one of addition, subtraction, and multiplication." 64

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E. Claim 10: "The computer program product of claim 1, wherein determining the intermediate condition code value comprises storing the intermediate condition code value in a condition code storage location as the provisional target machine condition code, and wherein determining the target machine condition code based on the distinguishing information and the intermediate condition code value comprises performing at least one operation on the intermediate condition code value stored in the condition code storage location to obtain the target machine condition code and storing the target machine condition code in the condition code storage location." 65

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G. Claim 6: The computer program product of claim 1, wherein the sequence of target machine instructions together operate to directly calculate the target machine condition code using at least one of addition, subtraction, and multiplication.....112

H. Claim 10: The computer program product of claim 1, wherein determining the intermediate condition code value comprises storing the intermediate condition code value in a condition code storage location as the provisional target machine condition code, and wherein determining the target machine condition code based on the distinguishing information and the intermediate condition code value comprises performing at least one operation on the intermediate condition code value stored in the condition code storage location to obtain the target machine condition code and storing the target machine condition code in the condition code storage location. 113

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