UNITED STATES PATENT AND TRADEMARK OFFICE
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BEFORE THE PATENT TRIAL AND APPEAL BOARD
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CISCO SYSTEMS, INC. AND JUNIPER NETWORKS, INC.,
Petitioners,

v.

ORCKIT CORPORATION,
Patent Owner.
_____

Case IPR2023-00554[1]
U.S. Patent No. 10,652,111
_____

PATENT OWNER'S SUR-REPLY

_____

[1] IPR2024-00037 (Juniper Networks, Inc) has been joined with this proceeding.

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Page(s)

Cases

EXHIBIT LIST	
2001	*Orckit Corporation v. Cisco Systems, Inc.*, Case No. 2:22-cv-00276, Dkt. No. 46 (E.D. Tex., Jan. 15, 2023), First Amended Docket Control Order ("First Amended Docket Control Order")
2002	*Orckit Corporation v. Cisco Systems, Inc.*, Case No. 2:22-cv-00276, Dkt. No. 28 (E.D. Tex., Nov. 4, 2022), Notice of Compliance ("11-4-2022 Notice of Compliance")
2003	*Orckit Corporation v. Cisco Systems, Inc.*, Case No. 2:22-cv-00276, Dkt. No. 47 (E.D. Tex., Jan. 19, 2023), Notice of Compliance ("1-19-2023 Notice of Compliance")
2004	*Orckit Corporation v. Cisco Systems, Inc.*, Case No. 2:22-cv-00276, Dkt. No. 55 (E.D. Tex., Mar. 23, 2023), Defendant's Motion To Stay
2005	*Orckit Corporation v. Cisco Systems, Inc.*, Case No. 2:22-cv-00276, Dkt. No. 56 (E.D. Tex., Mar. 29, 2023), Order Denying Motion to Stay
2006	United States District Courts National Judicial Caseload Profile For the 12 Months Ending March 31, 2023 (available at https://www.uscourts.gov/sites/default/files/data_tables/fcms_na_distprofile0331.2023.pdf) ("Judicial Caseload Statistics")
2007	*Orckit Corporation v. Cisco Systems, Inc.*, Case No. 2:22-cv-00276, Dkt. No. 50 (E.D. Tex., Feb. 3, 2023), Notice of Compliance ("2-3-2023 Notice of Compliance")
2008	Reserved
2009	December 11, 2008 Final Rejection (U.S. Appl. No. 11/123,801) ("'801 Application Final Rejection")
2010	July 28, 2008 Claim Amendments (U.S. Appl. No. 11/123,801) ("'801 Application Pending Claims")
2011	*Orckit Corporation v. Cisco Systems, Inc.*, Case No. 2:22-cv-00276, Dkt. No. 59 (E.D. Tex., Mar. 30, 2023), Order Granting Motion To Amend Invalidity Contentions
2012	*Orckit Corporation v. Cisco Systems, Inc.*, Case No. 2:22-cv-00276, Dkt. No. 61 (E.D. Tex., April 13, 2023), Order Granting Motion To Amend Invalidity Contentions
2013	"About Orckit-Corrigent: Executive Summary," 2011

2014	*Orckit Corporation v. Cisco Systems, Inc.*, Case No. 2:22-cv-00276, (E.D. Tex., April 13, 2023), Defendant's First Amended Invalidity Contentions (Cover Pleading)
2015	*Orckit Corporation v. Cisco Systems, Inc.*, Case No. 2:22-cv-00276, (E.D. Tex., April 13, 2023), Defendant's First Amended Invalidity Contentions (Exhibit A - '904 Patent Charts)
2016	*Orckit Corporation v. Cisco Systems, Inc.*, Case No. 2:22-cv-00276, (E.D. Tex., April 13, 2023), Defendant's First Amended Invalidity Contentions (Exhibit B - '821 Patent Charts)
2017	*Orckit Corporation v. Cisco Systems, Inc.*, Case No. 2:22-cv-00276, (E.D. Tex., April 13, 2023), Defendant's First Amended Invalidity Contentions (Exhibit C - '740 Patent Charts)
2018	*Orckit Corporation v. Cisco Systems, Inc.*, Case No. 2:22-cv-00276, (E.D. Tex., April 13, 2023), Defendant's First Amended Invalidity Contentions (Exhibit D - '111 Patent Charts)
2019	*Orckit Corporation v. Cisco Systems, Inc.*, Case No. 2:22-cv-00276, (E.D. Tex., April 13, 2023), Defendant's First Amended Invalidity Contentions (Exhibit E - Combination Charts)
2020	*Orckit Corporation v. Cisco Systems, Inc.*, Case No. 2:22-cv-00276, (E.D. Tex., April 13, 2023), Defendant's First Amended Invalidity Contentions (SME Contentions)
2021	United States District Courts National Judicial Caseload Profile For the 12 Months Ending December 31, 2022 (available at https://www.uscourts.gov/sites/default/files/data_tables/fcms_na_distprofile1231.2022.pdf) ("December 22 Judicial Caseload Statistics")
2022	Declaration of George Stamatopoulos in support of Patent Owner's Motion for Pro Hac Vic Admission
2023	Declaration of Michael Ng in support of Patent Owner's Motion for Pro Hac Vice Admission
2024	Stipulation of Dismissal
2025	Declaration of Miguel Gomez
2026	CV of Michael Gomez
2027	"DPI & DFI: A Malicious Behavior Detection Method Combining Deep Packet Inspection and Deep Flow Inspection" by Guo et al., Procedia Engineering 174, 1309-1314 (2017)

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