

Patent No. 6,513,058
Petition For *Inter Partes* Review

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ROCKWELL AUTOMATION, INC.
ROCKWELL AUTOMATION TECHNOLOGIES, INC.
Petitioners

v.

AUTOMATION MIDDLEWARE SOLUTIONS, INC.
Patent Owner

Patent No. 6,513,058
Issue Date: January 28, 2003
Title: DISTRIBUTION OF MOTION CONTROL COMMANDS OVER A
NETWORK

Inter Partes Review No. 2017-00023

**PETITION FOR *INTER PARTES* REVIEW
UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42.100 *ET SEQ.***

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1.	Claim 1	38
a.	Cashin alone or in combination with the ODBC Programmer’s Guide discloses every limitation of elements 1(a)-(b) and 1(f)-(k) of claim 1	38
(i)	[1a] “A system for allowing an application program to communicate with any one of a group of supported hardware devices, the system comprising:”	38
(ii)	[1b] “a software system operating on at least one workstation, the software system comprising at least one application program comprising”	39
(iii)	[1f] “a core set of core driver functions, where each core driver function is associated with one of the primitive operations”	41

- (iv) [1g] “an extended set of extended driver functions, where each extended driver function is associated with one of the non-primitive operations”45
 - (v) [1h] “component code associated with each of the component functions, where the component code associates at least some of the component functions with at least some of the driver functions”46
 - (vi) [1i] “a set of software drivers, where each software driver is associated with one of the hardware devices and comprises driver code for implementing the driver functions”49
 - (vii) [1j] “a control command generating module for generating control commands based on the component functions of the application program, the component code associated with the component functions, and the driver code associated with the software drivers; and”53
 - (viii) [1k] “a network communication protocol that allows the control commands to be communicated from the control command generating module on the at least one workstation to at least one of the supported hardware devices over a network”54
- b. It would have been obvious to combine Cashin and the ODBC Programmer’s Guide with the GML references to achieve elements (c)-(e) of claim 155
- (i) [1c] “a set of component functions defining a desired motion sequence, the desired motion sequence being comprised of”55

	(ii)	[1d] “primitive operations that are necessary to define the desired motion sequence and”	58
	(iii)	[1e] “non-primitive operations that may be simulated using a combination of primitive operations”	59
2.		Claim 2	60
	a.	[2a] “A system as recited in claim 1, in which:”	60
	b.	[2b] “the software system operates on a plurality of workstations; the application program runs on a first of the plurality of workstations”	60
	c.	[2c] “the control command generating module operates on a second of the plurality of workstations;”	63
	d.	[2d] “and the network communication protocol allows the component functions to be communicated from the application program on the first of the plurality of workstations to control command generating module on the second workstation over the network.”	63
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		b. It would have been obvious to combine Cashin and the ODBC Programmer’s Guide with Motion Toolbox to achieve elements (c)-(e) of claim 1	69

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