## UNITED STATES PATENT AND TRADEMARK OFFICE

## BEFORE THE PATENT TRIAL AND APPEAL BOARD

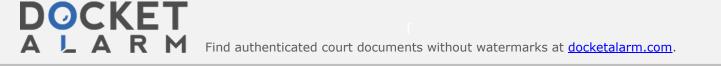
ADVANCED MICRO DEVICES, INC. Petitioner

v.

BROADCOM CORPORATION Patent Owner

> Case No. Unassigned Patent 7,720,294

PETITION FOR *INTER PARTES* REVIEW OF CLAIMS 1-3 AND 9-11 OF U.S. PATENT NO. 7,720,294



## TABLE OF CONTENTS

## Page

I. INTRODUCTION		
II. MANDATORY NOTICES, STANDING, AND FEES		
A. Mandatory Notices1		
B. Certification of Grounds for Standing		
C. Fees		
III. OVERVIEW OF THE '294 PATENT		
IV. SUMMARY OF PRIOR ART		
A. Nguyen		
B. Wise7		
C. Molloy		
D. Pearson11		
V. CLAIM CONSTRUCTION		
A. "wherein the video decoder executes"		
VI. THERE IS A REASONABLE LIKELIHOOD THAT THE CHALLENGED CLAIMS ARE UNPATENTABLE		
A. Ground 1: The combination of Wise and Nguyen renders Claims 1, 3, 9, and 11 Obvious Under 35 U.S.C. § 103		
1. A POSITA would have had a motivation to combine Nguyen and Wise14		
2. The combination of Nguyen and Wise discloses every element of Claims 1, 3, 9, and 11		
B. Ground 1A: The combination of Wise, Nguyen, and Molloy renders Claims 2 and 10 Obvious Under 35 U.S.C. § 10341		
1. A POSITA would have had a motivation to combine Wise/Nguyen and Molloy		
2. The combination of Wise and Nguyen and Molloy discloses every element of Claims 2 and 10		
C. Ground 2: The combination of Nguyen and Molloy renders Claims 1-3 and 9-11 Obvious Under 35 U.S.C. § 103		
<ol> <li>A POSITA would have had a motivation to combine Molloy and Nguyen.</li> <li>44</li> </ol>		

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	The combination of Nguyen and Molloy discloses every element of cla 3 and 9-11.	
D. (	Ground 3: Pearson anticipates Claims 1-3 and 9-11 under 35 U.S.C. § 10	2 5 7
1.	Claim 1	57
2.	Claim 2	69
3.	Claim 3	70
4.	Claim 9-11	71
VII. (	CONCLUSION	72

1001	U.S. Patent No. 7,720,294 (the "'294 Patent")
1002	Prosecution History of the '294 Patent
1003	Declaration of Dr. Samuel Russ
1004	U.S. Patent No. 6,909,744 to Molloy
1005	U.S. Patent No. 6,425,054 to Nguyen
1006	U.S. Patent No. 7,236,525 to Pearson
1007	U.S. Patent No. 7,230,986 to Wise
1008	CV of Dr. Samuel Russ

## LIST OF EXHIBITS

Petition for IPR of Claims 1-3 and 9-11 of U.S. Patent No. 7,720,294

### I. INTRODUCTION

Advanced Micro Devices, Inc. ("AMD" or "Petitioner") requests *inter partes* review ("IPR") under 35 U.S.C. §§ 311–319 and 37 C.F.R. § 42.100 *et seq*. of Claims 1-3 and 9-11 of U.S. Patent No. 7,720,294 ("294 Patent").

Petitioner asserts that there is a reasonable likelihood that the challenged claims are unpatentable and requests review of, and cancellation of, the challenged claims under 35 U.S.C. §§ 102 and 103.

## II. MANDATORY NOTICES, STANDING, AND FEES

### A. Mandatory Notices

<u>Real Party in Interest</u>: Petitioner AMD and ATI Technologies ULC are the real parties-in-interest. ATI Technologies ULC is an indirect, wholly owned subsidiary of AMD (with 1252986 Alberta ULC being the intervening direct subsidiary of AMD and parent of ATI Technologies ULC).

<u>Related Matters</u>: The '294 Patent is subject to a pending lawsuit entitled *Broadcom Corp. v. Sony Corp.*, No. 8:16-cv-01052 (C.D. Cal.). Petitioner is not a party to this suit and does not control any party to this suit.

Lead Counsel: Lead Counsel is Brian Oaks (Reg. 44,981) and Back-up Counsel is and Jennifer Nall (Reg. 57,053), each of Baker Botts L.L.P.

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