

Juniper Networks, Inc. v. Portsmouth Network Corp.,

PATENT OWNER PORTSMOUTH PRESENTATION

Inter Partes Review of
U.S. Patent No. 8,014,394

IPR2024-00913 & IPR2024-00989

1

Grounds

Ground ³	Claim(s) Challenged	35 U.S.C. §	References/Basis
1.1	1, 2, 4, 6, 7, 11, 12, 14, 17	103 (a)	Blease, Weyman, Hu
1.2	16	103 (a)	Blease, Weyman, Hu, Deng
2.1	8, 18	103 (a)	Blease, Weyman
2.2	9	103 (a)	Blease, Weyman, Hu
2.3	10	103 (a)	Blease, Weyman, Hu, Deng
2.4	8, 18	103 (a)	Blease, Weyman, Rao
2.5	9, 10	103 (a)	Blease, Weyman, Rao, Hu and Blease, Weyman, Rao, Deng respectively

³The Grounds prefixed with 1, refer to the Grounds in the -00913 Petition and the Grounds prefixed with 2, refer to the Grounds in the -00989 Petition

Roadmap

Ground 1.1

*Blease, Weyman and
Hu*

Independent Claims 1 & 11 (Dependent Claims 2, 4, 6, 7, 12, 14, and 17)

- No motivation to combine Blease, Weyman and Hu
- Cited art fails to teach limitations relating to:
 - "Multiple Interconnected Processing Units and Multiple Ports"
 - "Storing in each processing unit . . . Respective lists, each list/each of which indicating indicating all of one or more multicast packet streams that are permitted for forwarding by the network element and further indicating which of the one or more ports each multicast packet stream is permitted to be forwarded to"
 - "selectively forwarding multicast packets associated with the given multicast packet stream by the processing units in accordance with the respective updated list"
 - "wherein operating the network element comprises aggregating two or more of the ports to form a high-capacity port, and wherein two or more of the ports are aggregated to form a high-capacity port"

Roadmap

Ground 1.2

Dependent Claims 16

*Blease, Weyman, Hu,
and Deng*

- No motivation to combine for the same reasons provided in Ground 1.1
- Cited art fails to teach limitations relating to tracking and removing permissions :
 - “track[ing] a use of a permission to forward a certain multicast packet”
 - “removing the permission from the respective lists responsively to determining the permission is aged”

Ground 2.1

Dependent Claims 8 and 18

*Weyman, Li, and
Rooholamini*

- No motivation to combine for the same reasons provided in Ground 1.1.
- Cited art fails to teach limitations relating to adding new routers:
 - “wherein operating the network element comprises initializing a new processing unit added to the network element”
 - “wherein operating the network element comprises initializing a new processing unit added to the network element”

Roadmap

Ground 2.2

Dependent Claim 9

*Blease, Weyman and
Hu*

- No motivation to combine for the same reasons provided in Ground 1.1
- Cited art fails for the same reasons provided in Ground 1.1 because Petitioner makes the same argument here.

Ground 2.3

Dependent Claim 10

*Weyman, Hu, and
Deng*

- No motivation to combine for the same reasons provided in Ground 1.1.
- Cited art fails for the same reasons provided in Ground 1.1 because Petitioner makes the same argument here.

Roadmap

Ground 2.4

Dependent Claims 8 and 18

*Blease, Weyman and
Rao*

- No motivation to combine for the same reasons provided in Ground 1.1
- Cited art fails for the same reasons provided in Ground 1.1 because Petitioner makes the same argument here.

Ground 2.5.1

Dependent Claim 9

*Weyman, Rao, and
Hu*

- No motivation to combine for the same reasons provided in Ground 1.1.
- Cited art fails for the same reasons provided in Ground 1.1 because Petitioner makes the same argument here.

Roadmap

Ground 2.5.2

Dependent Claim 10

*Blease, Weyman,
Rao, and Deng*

- No motivation to combine for the same reasons provided in Ground 1.1
- Cited art fails for the same reasons provided in Ground 1.1 because Petitioner makes the same argument here.

No Motivation to Combine *Blease, Weyman, and Hu*

Blease Discloses A Centralized Control Architecture

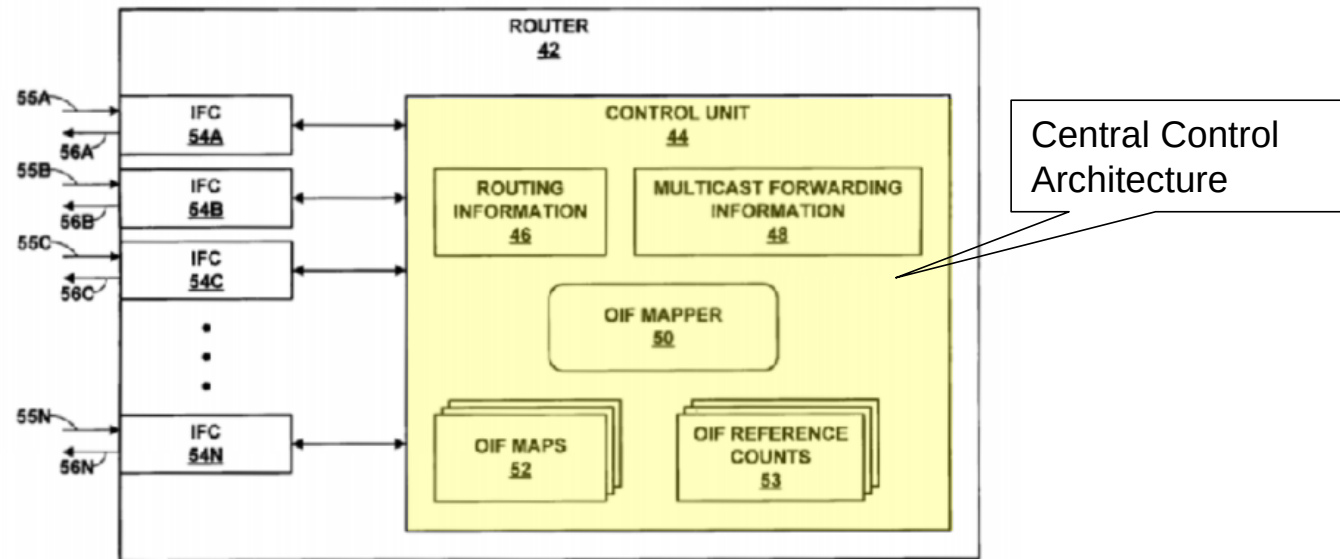


FIG. 4

Ex. 1005 (Blease), 11:54-57

Blease Discloses A Centralized Control Architecture

Blease's control unit (44) manages routing (46), multicast forwarding (48), and OIF mapping (50), all centralized functions. *See* POR, 11-12; Ex. 1005, Fig. 4; 8:39–11:17. Specifically, Blease's core principles include:

1. Mapping membership requests to a dedicated OIF via a centralized map (Ex. 1005, 2:23–35),
2. Sending one copy of the multicast stream to the switch (*Id.*),
3. Relying on the switch—not the router—for replication (*Id.*).

Petitioner Failed To Meet Its Burden Of Showing That Blease Discloses A Distributed Architecture

in each of these, “distributed” means spread across. Thus, the phrase “may be distributed within IFCs” means the control unit is divided or spread throughout the IFCs, not that it is physically reproduced in different IFCs as Petitioner contends.

IPR2024-00913
Petition for Inter Partes Review

to use one of OIF maps 52.” Blease, 14:10-12. If not configured to use OIF maps 52, then at step 65, the OIF mapper 50 maps an unmapped interface to multicast forwarding information 48. Blease, 14:14-20. The mapped interface may be the interface that carried the membership request. Blease, 6:62-7:3, 8:29-38. Finally, at step 82, an outgoing multicast stream is transmitted on the mapped interface according to multicast forwarding information 48. Blease, 8:64-67, 10:49-52, 14:50-57. Lavian, ¶¶60-61.

Blease explains that router 42 may be configured in a variety of ways. For example, control unit 44 and its corresponding functionality may be distributed within IFCs 54. Blease, 11:54-57. That is, like the ‘394 patent, Blease describes a distributed network element configuration of line cards that enables the network element to update multicast forwarding information tables of the cards. Lavian, ¶62.

2. Overview: Weyman

Weyman (EX1006) also describes a system and method for multicast routing, including a distributed router composed of individual units. Weyman, Abstract, [0001]. Weyman Fig. 10 (below) shows one disclosed implementation of a distributed multicast router.

- 18 -

Blease explains that router 42 may be configured in a variety of ways. For example, control unit 44 and its corresponding functionality may be distributed within IFCs 54. Blease, 11:54-57. That is, like the ‘394 patent, Blease describes a distributed network element configuration of line cards that enables the network element to update multicast forwarding information tables of the cards. Lavian, ¶62.

Blease's Global Port Control Technique Is Incompatible With Weyman's Local Port Control Technique

A POSITA would not have found it obvious to combine Weyman's router distribution functionality in an architecture, like Blease, where there is a single central control unit

Blease discloses a router with a central control unit that globally manages ports

Weyman discloses a router distribution functionality where each of the processing units manage local ports.

Weyman's Disclosure Common Interface Technique Is Incompatible With Blease's Separate interface Technique

A POSITA would have no motivation to combine Weyman's disclosure of a common interface technique with Blease's separate interface technique

Blease states “unlike conventional multicast transmission techniques network device 24 sends a multicast stream to the requesting subscriber device on an OIF different than the interface on which network device 24 received the membership request.”

As Dr. Olivier explained, Figure 11 of Weyman illustrates that the IGMP report message is received on the same interface from which the IP multicast stream is sent.

Hu's Request-By-Request Technique Is Incompatible With Blease's Stream-By-Stream Technique

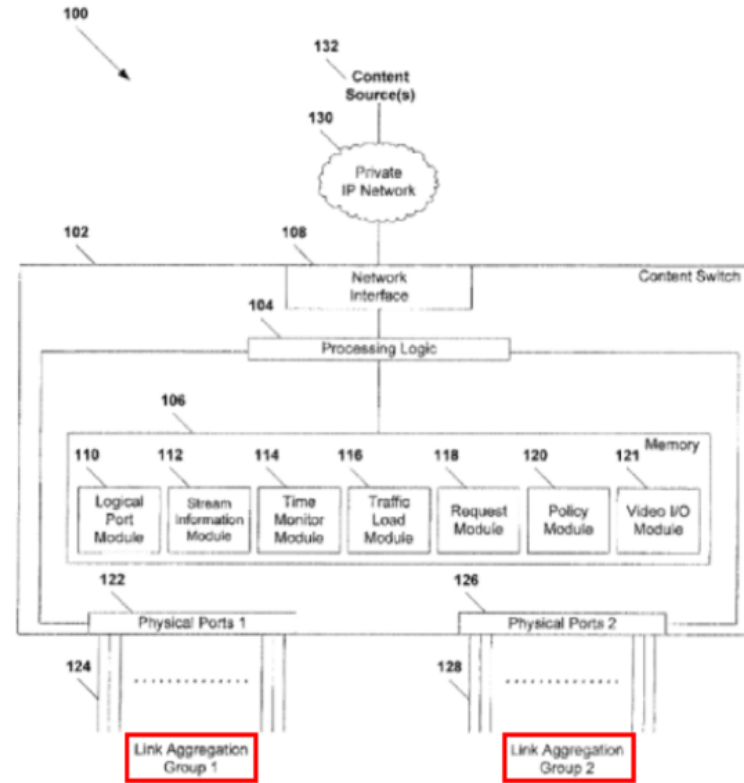


FIG. 1

Ex. 1007 (Hu), Fig. 1

Hu's Request-By-Request Technique Is Incompatible With Blease's Stream-By-Stream Technique

A POSITA would have no motivation to combine Hu's Request-By-Request technique with Blease's Stream-By-Stream Technique

Under Blease's stream-by-stream approach, the control unit only establishes a new traffic flow upon receiving a join request if it is the first such request for that particular stream

Hu's request-by-request technique employs a complex system that analyzes port load in real time to determine whether the traffic load from each join request can be supported

Hu's Link Aggregation Group Is Incompatible With Blease's Single Physical Connection

A POSITA would have no motivation to combine Hu's Link Aggregation Group with Blease's Single Physical Connection

Blease discloses "Network device 24 is connected to network switch 22 via a single physical connection."

Hu teaches aggregating a plurality of ports into a single logical port as a link aggregation group

Blease, Weyman and Hu Fail To Teach The Challenged Claims

No Disclosure Of “Multiple Interconnected Processing Units And Multiple Ports” And “Storing Lists In Each Processing Unit”

1. A method for communication, comprising:
operating a network element, wherein the network element further comprises multiple interconnected processing units and multiple ports, wherein each processing unit is assigned to a different subset of the multiple ports of the network element, and wherein each processing unit contains a processor for processing packets communicated over the different subset of the multiple ports to which the processing unit is assigned;
storing in each processing unit a respective list, each list indicating all of one or more multicast packet streams that are permitted for forwarding by the network element, and further indicating which of the one or more ports each multicast packet stream is permitted to be forwarded to;

11. A network element, comprising;
multiple ports; and
multiple interconnected processing units, wherein each processing unit is assigned to a different subset of the multiple ports of the network element, and wherein each processing unit contains a processor for processing packets communicated over the different subset of the multiple ports to which the processing unit is assigned, wherein the processing units are configured to process packets that are communicated over respective subsets of one or more of the ports,

No Disclosure Of “Multiple Interconnected Processing Units And Multiple Ports” And “Storing Lists In Each Processing Unit”

Blease further discloses that control unit 44 and its functionality is distributed within IFCs 54. Blease, 11:54-57. Accordingly, each IFC 54 includes control unit 44 and is a processing unit.

Petition, p. 33

No Disclosure Of “Lists” Limitations

- Blease depicts a mapping table, not a list.

58

	GroupPrefix	SourcePrefix	OutgoingInterface
1	232.0.0.1/32	51.0.0.1/32	atm3/0.1
2	232.0.0.1/32	51.0.0.2/32	atm3/0.2
3	233.0.0.1/32	*	atm3/0.3
4	233.0.0.0/24	51.0.0.1/32	atm3/0.4
5	233.0.0.0/24	51.0.0.2/32	atm3/0.5
6	234.0.0.0/24	51.0.0.0/24	self

FIG. 5

Ex. 1005 (Blease), Fig. 5

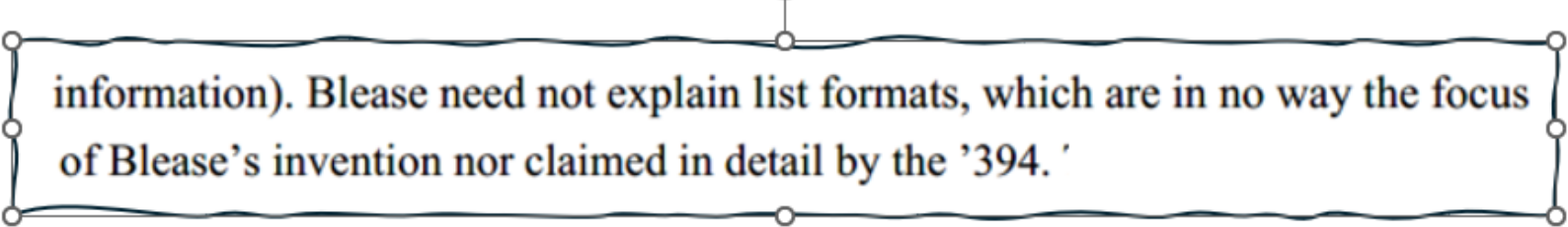
Some example membership request mappings are given below:

<51.0.0.1, 232.0.0.1> is mapped to atm3/0.1 by entry 1
<51.0.0.2, 232.0.0.1> is mapped to atm3/0.2 by entry 2
<51.0.0.3, 232.0.0.1> is not mapped
<*, 232.0.0.1> is not mapped
<51.0.0.1, 233.0.0.1> is mapped to atm3/0.3 by entry 3
<*, 233.0.0.1> is mapped to atm3/0.3 by entry 3
<51.0.0.1, 233.0.0.2> is mapped to atm3/0.4 by entry 4
<51.0.0.2, 233.0.0.254> is mapped to atm3/0.5 by entry 5
<51.0.0.3, 233.0.0.2> is not mapped
<51.0.0.3, 234.0.0.1> is mapped to the mapping interface by entry 6

Ex. 1005 (Blease), 12:45-57

No Disclosure Of “Lists” Limitations

Petitioner admits that Blease does not teach list formats, and therefore fails to meet its burden to specifically identify where the “lists” limitations are met in the prior art.



information). Blease need not explain list formats, which are in no way the focus of Blease’s invention nor claimed in detail by the ’394. ’

No Disclosure Of “Each List Indicating All Of One Or More Multicast Packet Streams That Are Permitted For Forwarding By The Network Element”

Blease, 10:55-61. Thus, the multicast forwarding information 48 is updated when a requested multicast stream is not currently forwarded (*i.e.*, a new request to start forwarding a stream not currently being forwarded must be tracked so that future requests will recognize that the stream is then being “currently forwarded”), but if the multicast stream is already currently forwarded at the time of the request, no change is needed (*i.e.*, the stream is already currently forwarded, so that “currently forwarded” information does not change). But, even if PO was correct in saying

Reply, p. 12

needed.” Reply at 12. This concession directly supports PO’s position that Blease’s multicast forwarding information only tracks the first unique instance of a stream and does not track **all multicast packet streams**. POR at 20 (citing Ex. 2005 at ¶ 54) (emphasis added). Lastly, Petitioner argues that “even if PO is correct in saying

Sur-reply, p. 10

No Disclosure Of “Selectively Forwarding Multicast Packets Associated With The Given Multicast Packet Stream By the Processing Units In Accordance With The Respective Updated List”

- Nothing on the record to suggest that the identity of the “multicast packets associated with the given multicast packet streams” are in the multicast forwarding information (e.g., the “list”) prior to forwarding them to the IFCs.
 - Blease describes adding the mapped OIF to the multicast forwarding information.
 - A POSITA would not be motivated to modify Blease’s multicast forwarding information in view of either Weyman or Hu.
 - Without identifying “multicast packets associated with the given multicast packet streams” in the “list,” Petitioner fails to meet its burden to prove that “multicast packets” are selectively forwarded “in accordance with the respective updated list.”

No Disclosure Of “Distributing The Request Among The Multiple Processing Units”

As explained, **Blease does not describe any mechanism by which a request is distributed across multiple processing units.** POR, 31–34. Instead, the control unit (44) centrally receives and processes requests, accesses the OIF maps (52), and updates multicast forwarding information (48). POR, 33; *see* Ex. 1005, Fig. 4; 8:39–11–17.

Therefore, without any disclosure or explanation of how the request (not just the outcome of the request) is distributed among multiple processing units, as opposed to being centrally processed, **Petitioner has failed to meet its burden to show that this limitation is met or would have been obvious.**

No Disclosure Of Claim Limitations 1[f] and 11[f]

wherein operating the network element comprises aggregating two or more of the ports to form a high-capacity port, and

Ex. 1001, claim limitation 1[f]

wherein two or more of the ports are aggregated to form a high-capacity port, and wherein an upper limit is set on a

Ex. 1001, claim limitation 11[f]

45-46. But as previously explained, **Blease expressly teaches that the network switch is connected to the network device over a single physical connection.** § III.A.5; Ex. 2005 at ¶¶ 71, 91; *see also* Ex. 1005 at 7:24-25. And even if “aggregated physical ports” was disclosed (which it is not), there is no reason a POSITA would modify Blease to include the LAGs disclosed in Hu. *Id.* Indeed, as explained above, a POSITA would have added a higher capacity link instead of trying to incorporate the complexity of a LAG group into Blease’s system. *Id.* The Petition Fails to Establish that the Proposed Combination Discloses Claim Elements 1[g.ii], 1[g.iii], 11[c.iii], 11[c.iv]

Blease, Weyman, Hu, and Deng Fail To Teach The Challenged Claim

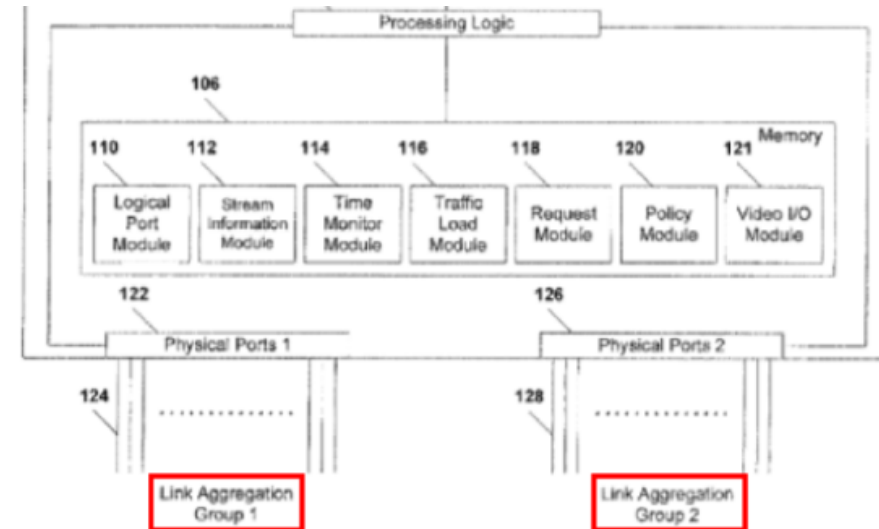
No Motivation To Modify Blease, Weyman, Hu Further In View Of Deng

16. The network element according to claim 11, wherein the processing units are configured to track a use of a permission to forward a certain multicast packet stream over a certain port by monitoring requests relating to the certain multicast packet stream that are received at the network element, and to remove the permission from the respective lists responsively to determining that the permission is aged.

No Motivation To Modify Blease, Weyman, Hu Further In View Of Deng

In the illustrated embodiment, network switch 22 may comprises a DSLAM. Network device 24 is connected to network switch 22 via a single physical connection. Within

Ex. 1005 (Blease), 5:24-25



Petition, p. 21 (citing Ex. 1007 (Hu)) (annotations in original)

No Motivation To Modify Blease, Weyman, Hu Further In View Of Deng

103. This is superior to Deng's teaching of using a timer to track the age of multicast stream permissions and remove those permissions by updating a multicast table upon expiration of the timer as active streams will not be removed which will dramatically affect user's experience for long running videos such as the Super Bowl. Thus, a POSITA would not be motivated to modify Hu in view of Deng.

No Motivation To Modify Blease, Weyman, Hu Further In View Of Deng

- Hu already discloses a more efficient method for dropping streams when video traffic falls below a threshold.

In an illustrative, non-limiting embodiment, the request module **118** can determine, before rejecting the request, whether an existing stream can be dropped at one of the first plurality of physical ports **122**, such that the video traffic load at the port does not exceed the threshold after the new video stream is added at the port. If no stream can be dropped at any

No Motivation To Modify Blease, Weyman, Hu Further In View Of Deng

Patent Owner's Expert Explained Why A POSITA Would Not Have Motivation To Modify Hu In View Of Deng

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Blease and Weyman Fail To Teach Limitations Relating To Adding New Processing Units

No Motivation To Combine Blease And Weyman and Petitioner Fails to Meets Its Burden of Showing That The Combination Satisfies The Claim Limitations

A POSITA would not have looked to the teachings in Blease to add a processing unit in Weyman's system because Weyman already taught a number of ways to add a processing unit

Weyman, however, does not explain procedural details for updating the configuration of a unit, as claimed in the '394, leaving that to the knowledge of a POSA. For example, a POSA would have recognized that a new unit (and its ports)

989_Petition, p. 25

router.' While Weyman does not describe the exact method that must be used to update a new unit" Petition at pp. 24-26; Ex. 1103 at ¶ 93. This statement is misleading because Weyman describes a method of updating a unit with a default configuration when it joins the fabric. Ex. 2005 ¶¶ 59-61; *see also* Ex. 1006 at [0069] ("For the routers to operate as a single distributed router every defined router configuration should be identical on all units in the fabric. Preferably the configuration is stored in non-volatile storage in all the units. If the system can accommodate the addition or removal of units, then when a unit with a default configuration joins the fabric, it needs to update its configuration to that of the distributed router.").

POR, pp. 40-41 ("non-default" is a typo)

Patent Owner's Argument Is Based On Unrebutted Expert Opinion

Dr. Olivier testified that the paragraph “doesn’t make sense unless that’s a typo,” and a POSITA would understand “non-default” to mean “default.” Ex. 2005,

11 Q. And how do you arrive at the conclusion that
12 it's a typo?
13 A. Because the paragraph doesn't make sense
14 unless that's a typo. And when I first read it, it
15 didn't make sense to me. And as a POSITA, I couldn't
16 figure out how to reconcile it, what -- the
17 contradictions in the paragraph -- until I realized that
18 was a typo.
19 Q. Okay.
20 A. Then everything made sense.

Petitioner's Attorney Argument Should Be Afforded No Weight

The Reply uses attorney argument to support its position that the term “non-default” in paragraph [0069] of Weyman is not a typo. Reply, 24-26. But this lacks evidentiary support. As the Federal Circuit has held, “arguments of counsel cannot take the place of evidence lacking in the record.” *Estee Lauder Inc. v. L’Oreal, S.A.*, 129 F.3d 588, 595 (Fed. Cir. 1997) (internal citations omitted); *NexStep, Inc. v. Comcast Cable Comm’cns*, 119 F.4th 1355, 1376 n.6 (Fed. Cir. 2024) (“statements of counsel . . . are not evidence”). Even if Petitioner’s attorney argument is

Blease, Weyman, and Rao Fail To Teach Limitations Relating To Adding New Processing Units

No Motivation To Combine

8. A method for communication, comprising:
operating a network element, wherein the network element further comprises multiple interconnected processing units and multiple ports, wherein each processing unit is assigned to a different subset of the multiple ports of the network element, and wherein each processing unit contains a processor for processing packets communicated over the different subset of the multiple ports to which the processing unit is assigned;
storing in each processing unit a respective list, each list indicating all of one or more multicast packet streams that are permitted for forwarding by the network element, and further indicating which of the one or more ports each multicast packet stream is permitted to be forwarded to;
receiving from a client a request relating to reception of a given multicast packet stream;
distributing the request among the multiple processing units within the network element, and updating the respective list in each processing unit responsively to the request; and
selectively forwarding multicast packets associated with the given multicast packet stream by the processing units in accordance with the respective updated lists,
wherein operating the network element comprises initializing a new processing unit added to the network element by:
deactivating the ports to which the new processing unit is assigned;
while the ports to which the new processing unit is assigned are deactivated, sending a multicast status request, receiving multicast membership reports sent by multicast clients in response to the multicast status request, constructing the list by the new processing unit based on the received multicast membership reports; and
after constructing the list, activating the ports to which the new processing unit is assigned.

Ex. 1001, claim 8

18. A network element, comprising:
multiple ports; and
multiple interconnected processing units, wherein each processing unit is assigned to a different subset of the multiple ports of the network element, and wherein each processing unit contains a processor for processing packets communicated over the different subset of the multiple ports to which the processing unit is assigned, wherein the processing units are configured to process packets that are communicated over respective subsets of one or more of the ports,
to store respective lists, each of which indicates all of one or more multicast packet streams that are permitted for forwarding by the network element and further indicates which of the one or more ports multicast packet stream is permitted to be forwarded to,
to receive from a client a request relating to reception of a given multicast packet stream, and
to distribute the request among the processing units within the network element so as to update the lists responsively to the distributed request and to selectively forward multicast packets associated with the given multicast packet stream in accordance with the updated lists,
wherein a new processing unit added to the network element is configured to initialize by:
deactivating the ports to which the new processing unit is assigned;
while the ports to which the new processing unit is assigned are deactivated, sending a multicast status request, receiving multicast membership reports sent by multicast clients in response to the multicast status request, constructing the list by the new processing unit based on the received multicast membership reports; and
after constructing the list, activating the ports to which the new processing unit is assigned.

Ex. 1001, claim 18

No Motivation To Combine

deactivating the ports to which the new processing unit is assigned;
while the ports to which the new processing unit is assigned are deactivated, sending a multicast status request, receiving multicast membership reports sent by multicast clients in response to the multicast status request, constructing the list by the new processing unit based on the received multicast membership reports; and
after constructing the list, activating the ports to which the new processing unit is assigned.

Ex. 1001, claim 8

deactivating the ports to which the new processing unit is assigned;
while the ports to which the new processing unit is assigned are deactivated, sending a multicast status request, receiving multicast membership reports sent by multicast clients in response to the multicast status request, constructing the list by the new processing unit based on the received multicast membership reports; and
after constructing the list, activating the ports to which the new processing unit is assigned.

Ex. 1001, claim 18

No Motivation To Combine

Rao therefore teaches to initialize a processing unit by activating the processing unit only after multicast membership information is solicited and a period for reply has elapsed. That is, Rao teaches “sending a multicast status request, receiving multicast membership reports sent by multicast clients in response to the multicast status request, constructing the list by the new processing unit based on the received multicast membership reports; and after constructing the list, activating the ports to which the new processing unit is assigned,” as claimed in claims 8 and 18 of the '394. And, while Rao does not explicitly state to first “deactivat[e] the ports to which the new processing unit is assigned,” because Rao teaches that the RPM being initialized was a “standby RPM” to a master RPM that failed, and because the RPM’s “internal router path IP multicast forwarding information” is “activat[ed]” after constructing table entries, as discussed above, a POSA would have recognized that the RPM and its ports would have been “deactivated” prior to being ready for normal operations. Lavian, ¶175.

Petition, p. 63

No Motivation To Combine

The POR explains there would be no motivation to combine Rao with Weyman because Weyman already describes how to initialize a newly added unit by synchronizing its configuration with an existing unit. POR at 45. A POSITA would not look to Rao for additional details when Weyman already provides a complete solution. Petitioner does not rebut this point in the Reply.

Petitioner Fails To Show That Rao Satisfies The Initialization Limitation Of Claims 8[f] and 18[d]

Dr. Olivier further explains that Rao's standby route processor module (RPM) is never initialized; it is kept synchronized with the master RPM to avoid losing state. See Ex. 2005, ¶¶ 113–114. Initializing the standby RPM would defeat its purpose and contradict Rao's architecture. *Id.* This directly undermines Petitioner's reliance on Rao to satisfy the initialization requirements of claims 8[f] and 18[d].

Conclusion

Ground 1.1

Blease, Weyman and Hu

Independent Claims 1 & 11 (Dependent Claims 2, 4, 6, 7, 12, 14, and 17)

- No motivation to combine Blease, Weyman and Hu
- Cited art fails to teach limitations relating to:
 - "Multiple Interconnected Processing Units and Multiple Ports"
 - "Storing in each processing unit . . . Respective lists, each list/each of which indicating indicating all of one or more multicast packet streams that are permitted for forwarding by the network element and further indicating which of the one or more ports each multicast packet stream is permitted to be forwarded to"
 - "selectively forwarding multicast packets associated with the given multicast packet stream by the processing units in accordance with the respective updated list"
 - "wherein operating the network element comprises aggregating two or more of the ports to form a high-capacity port, and wherein two or more of the ports are aggregated to form a high-capacity port"

Conclusion

Ground 1.2

Dependent Claims 16

*Blease, Weyman, Hu,
and Deng*

- No motivation to combine for the same reasons provided in Ground 1.1
- Cited art fails to teach limitations relating to tracking and removing permissions :
 - “track[ing] a use of a permission to forward a certain multicast packet”
 - “removing the permission from the respective lists responsively to determining the permission is aged”

Ground 2.1

Dependent Claims 8 and 18

*Weyman, Li, and
Rooholamini*

- No motivation to combine for the same reasons provided in Ground 1.1.
- Cited art fails to teach limitations relating to adding new routers:
 - “wherein operating the network element comprises initializing a new processing unit added to the network element”
 - “wherein operating the network element comprises initializing a new processing unit added to the network element”

Conclusion

Ground 2.2

Dependent Claim 9

*Blease, Weyman and
Hu*

- No motivation to combine for the same reasons provided in Ground 1.1
- Cited art fails for the same reasons provided in Ground 1.1 because Petitioner makes the same argument here.

Ground 2.3

Dependent Claim 10

*Weyman, Hu, and
Deng*

- No motivation to combine for the same reasons provided in Ground 1.1.
- Cited art fails for the same reasons provided in Ground 1.1 because Petitioner makes the same argument here.

Conclusion

Ground 2.4

Dependent Claims 8 and 18

*Blease, Weyman and
Rao*

- No motivation to combine for the same reasons provided in Ground 1.1
- Cited art fails for the same reasons provided in Ground 1.1 because Petitioner makes the same argument here.

Ground 2.5.1

Dependent Claim 9

*Weyman, Rao, and
Huy*

- No motivation to combine for the same reasons provided in Ground 1.1.
- Cited art fails for the same reasons provided in Ground 1.1 because Petitioner makes the same argument here.

Conclusion

Ground 2.5.2

Dependent Claim 10

*Blease, Weyman,
Rao, and Deng*

- No motivation to combine for the same reasons provided in Ground 1.1
- Cited art fails for the same reasons provided in Ground 1.1 because Petitioner makes the same argument here.