

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,
Petitioner

v.

CROGA INNOVATIONS LTD.,
Patent Owner

IPR2024-001196
U.S. Patent No. 10,601,780

**PETITIONER'S REQUEST FOR REHEARING UNDER
37 C.F.R. § 42.71(d)**

I. Introduction

Petitioner Cisco Systems, Inc. (“Cisco”) requests rehearing under 37 C.F.R. § 42.71(d) of the Board’s Institution Decision dated February 13, 2025 (“DI”). The Board’s decision overlooked a key prior art disclosure identified in the Petition.

II. Delco’s packet filter 74 filters packets between the host and guest operating systems.

The Board’s decision overlooks Delco’s teaching that the packet filter 74 (“*internal firewall*”) filters packets passing between the host system and the virtual system. The claim language at issue is “*an internal firewall is configured to separate the host system from the virtual system.*”¹ The Board denied institution based on an incorrect understanding that “[p]acket filter 74 is positioned to protect Guest OS 58 from external network packets not from the host system or packets originating from the host system.” DI, 16-17. The Board also stated: “Packet filter 74 is a filter of packets from an external network and does not function to separate the host system from the virtual system.” DI, 17.

Such statements are contrary to the prior art and the Petition’s analysis. Delco’s packet filter 74 filter packets from both an external network **and from the host system**. In analyzing the “*internal firewall*” limitation, the Petition cites to

¹ Ex.1001, claim 1. Claim 11 recites similar language. *See* Petition, 68; DI, 11.

Delco's teaching that using "packet filters in the individual virtual machines enables each virtual machine to discretely manage network communications with respect to all external entities, **including the host operating system**." Ex.1005, 3:40-46; Petition, 40-41. Packet filter 74 corresponds to the claimed "*internal firewall*" because it applies "specific restrictions and controls" to filter packets passing between the guest operating system and host operating system. Ex.1005, 10:28-31; Pet., 19-20 & 39-40. For example, packet filter 74 is configurable to restrict the guest operating system's access to certain "destination ports" on the host operating system. Ex.1005, 8:44; Petition, 39-40 ("...customized policy rules such as... which ports the virtual machine can access"). Thus, Delco teaches the critical feature—filtering packets passing between the guest and host operating systems—that the Board mistakenly believed to be lacking.

III. Conclusion

Petitioner respectfully requests that the Board reconsider and institute an IPR trial.

Respectfully submitted,

Dated: March 14, 2025
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CERTIFICATE OF SERVICE

The undersigned certifies that, in accordance with 37 C.F.R. § 42.6(e),
service was made on Patent Owner as detailed below.

Date of service March 14, 2025

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