

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,
Petitioner

v.

PORTSMOUTH NETWORK CORP.,
Patent Owner

Case No. IPR2024-01450

U.S. Patent No. 7,596,088

PATENT OWNER'S RESPONSE

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<u>Exhibit</u>	<u>Description</u>
2008	Declaration of Dr. James Olivier
2009	Curriculum Vitae of Dr. Olivier
2010	Transcript of the Deposition of Dr. Nadir Mir
2011	U.S. Patent No. 8,463,122
2012	Cisco – MPLS Traffic Engineering Path Link and Node Protection

Pursuant to 37 C.F.R. § 42.107, Patent Owner Portsmouth Network Corporation (“Portsmouth”) submits this Response to the Petition for *Inter Partes* Review (“IPR”) of U.S. Patent No. 7,596,088 (the “’088 Patent”) (Paper 1).

I. INTRODUCTION

The Petition ignores fundamental differences in the design and structure of the network in the ’088 Patent and the references that Petitioner alleges render it obvious. The ’088 Patent teaches a method that allows bandwidth sharing between a new connection and existing connections in a network to improve efficiency and quality of service. Petitioner’s cited prior art references relate to an entirely different problem and focus on a completely different network structure than the ’088 Patent. The two primary references that Petitioner relies on relate to bandwidth sharing in the context of link or path failure protection. These references teach a pool of reserved bandwidth that can be shared between connections in the event of a failure rather than bandwidth sharing between existing connections that already have bandwidth allocated to them. The Petition does not address this critical issue and fails to reconcile these fundamental differences between the ’088 Patent and the cited references. Thus, Petitioner fails to provide any valid reasoning that would render the limitations of the ’088 Patent obvious.

Accordingly, Patent Owner respectfully requests that the Board find the ’088 Patent valid.

II. Grounds and Challenged Claims

The Board instituted review on the following obviousness grounds:

Claim(s) Challenged	(Pre-AIA) 35 U.S.C. §	Reference(s)/Basis
1-4, 6, 8-11, 13, 15-20	103	Dziong and Sathyanath
7, 14	103	Dziong, Sathyanath, and Jensen

As it pertains to this Patent Owner's Response, the '088 Patent includes 20 claims, with claims 1, 8, 15 and 17 being independent. Exemplary claim 1 is reproduced below:

[1.0] A method for establishing a connection through a communication network that includes multiple segments, comprising:

[1.1] identifying two or more candidate routes for a new connection having a requested bandwidth to be established through the network;

[1.2] providing a sharing definition specifying one or more other connections, which have respective bandwidths and which are permitted to share a bandwidth allocation with the new connection,

[1.3] such that a total bandwidth allocated jointly to the new connection and to the other connections in any given segment is equal to a maximum of the requested bandwidth and of the bandwidths of the other connections in the given segment;

[1.4] for each of the two or more candidate routes, calculating a cumulative additional bandwidth reservation to be allocated to the new connection in the segments along the candidate route, responsively to the sharing definition;

[1.5] selecting a preferred route having a minimum value of the cumulative additional bandwidth reservation out of the two or more candidate routes;
and

[1.6] establishing the new connection using the preferred route.

As demonstrated below, Ground 1 of the Petition fails to teach limitations [1.2]-[1.3], [8.4]-[8.5], [15.6]-[15.7], [17.3]-[17.4].

III. CLAIM CONSTRUCTION

A court “look[s] to the words of the claims themselves...to define the scope of the patented invention.” *Phillips v. AWH Corp.*, 415 F.3d 1303, 1312 (Fed. Cir. 2005) (en banc) (quoting *Vitronics Corp. v. Conceptronic, Inc.*, 90 F.3d 1576, 1582 (Fed. Cir. 1996)). A claim term is generally given its “ordinary and customary meaning,” which is “the meaning that the term would have to a person of ordinary skill in the art in question at the time of the invention.” *Id.* at 1312-13. While courts may deviate from the plain and ordinary meaning in some circumstances, there is a “heavy presumption that a claim term carries its ordinary and customary meaning.” *CCS Fitness, Inc. v. Brunswick Corp.*, 288 F.3d 1359, 1366 (Fed. Cir. 2002) (internal quotations omitted). Under this “exacting” standard, any departure from a claim’s ordinary meaning must be based on language that is “so unmistakable as to be unambiguous[.]” *Dealertrack Inc. v. Huber*, 674 F.3d 1315, 1322 (Fed. Cir. 2012) (citations omitted). Here, at this stage in the proceeding, Patent Owner will apply the ordinary and customary meaning to the ’088 Patent’s claim terms.

IV. PERSON OF ORDINARY SKILL IN THE ART

Petitioner contends that a person having ordinary skill in the art (“POSITA”) in January 2006 “would have a bachelor’s degree in computer science, computer engineering, electrical engineering, or equivalent training, and approximately four years of experience working in the field of network communications, including experience with MPLS tunnels and bandwidth allocation.” Pet. at 12. The Petition further notes that “[a]dditional work experience can substitute for specific educational background, and vice versa.” *Id.*

For the purposes of this Response, Patent Owner does not dispute Petitioner’s definition of a POSITA.

V. ARGUMENT

While Petitioner challenges all the ’088 Patent’s claims across its two Grounds, Petitioner challenges independent claims 1, 8, 15 and 17 in Ground 1 only. In that Ground, Petitioner argues that these claims are rendered obvious by a combination of U.S. Patent Application No. 2005/0220026 to Dziong et al. (“Dziong”) and U.S. Patent Application No. 2004/0190445 to Dziong and Sathyanath (“Sathyanath”). Pet. at 14. These references, however, fails to disclose crucial limitations that set up the framework of the ’088 Patent’s independent claims.

A. Overview of ’088 Patent

The ’088 Patent is directed to “methods and systems for selecting routes for communication connections that share bandwidth allocations in ring

configurations.” Ex. 1001, 1:7-9. Specifically, the ’088 Patent teaches “improved methods and systems for establishing a connection through a communication network, taking into account the ability to share bandwidth between the new connection and existing connections.” *Id.*, 2:13-17. As disclosed in the ’088 Patent, “[a] sharing definition defines connections that may share their bandwidth allocations.” *Id.*, 2:17-18. “[T]he set-up procedure of the new connection may comprise a sharing definition stating other connections with which the new connection can share its bandwidth allocation.” *Id.*, 7:7-9. The “sharing definition defines connections that may share their bandwidth allocation” with the new connection. *Id.*, 2:18-19.

The ’088 Patent teaches that to establish a new connection, the system identifies two or more candidate routes through the network. *Id.*, 6:9-13. “For each of the candidate routes, the disclosed methods and systems calculate the additional bandwidth reservation, accumulated over the network segments along the candidate route in question, which would be allocated to the new connection if it were established through this route.” *Id.*, 2:20-25. The claimed invention “take[s] into account the ability to share bandwidth between the new connection and existing connections that traverse ring 26,” and selects the route that requires the least amount of additional bandwidth. *Id.*, 5:36-39. Thus, the invention of the ’088 Patent improves on prior art methods by minimizing bandwidth consumption.

B. Overview of Dziong and Sathyanath

Dziong and Sathyanath are directed to the calculation of protection paths in the event of a link failure. Ex. 1005, Abstract; Ex. 1006, Abstract. These references teach implementing “primary paths” or “working paths,” i.e., the paths set up to carry traffic across a network, as well as “link detour paths,” which are activated in the event of a failure in the primary path. Ex. 2008, ¶¶35-38; Ex. 2010, 40:19-41:17; Ex. 1005, [0096]-[0098]; Ex. 1006, [0060]-[0063]. Dziong and Sathyanath further teach that link detour paths can implement bandwidth sharing to use resources more efficiently. Ex. 1005, [0088]; Ex. 1006, [0045]. In other words, the bandwidth reserved for the recovery of one link can be shared with bandwidth reserved for the recovery of other links. Ex. 1005, [0088]; Ex. 1006, [0060]-[0063]. Critically, both references teach that the protection bandwidth associated with the “link detour paths” is merely *reserved* and *not allocated* until a failure is detected in the primary path. Ex. 1005, [0088]; Ex. 1006, [0060]-[0063]; Ex. 2008, ¶¶39-42.

For instance, Dziong teaches that “[w]hen a new connection demand arrives at a source node,” either the source node or the server “calculate[s] the primary path and the associated protection path(s).” Ex. 1005, [0096]-[0098]; Ex. 2010, 50:15-51:2. Each node in Dziong’s network “does bookkeeping for each of its incident links of the amount of protection bandwidth that is needed to recover service in the event of each potential link failure in the network,” and the “amount of bandwidth

actually reserved on each incident link is the maximum of the bandwidths required to recover from any of the failures.” *Id.*, [0063]. This **reserved** protection bandwidth in the link detour paths is activated when a failure occurs in the primary links. *Id.*, [0121]; Ex. 2008, ¶¶39-41.

Similarly, Sathyanath, which shares an inventor with the Dziong reference, teaches that “in preferred embodiments of [its] inventions, the protection bandwidth is not allocated until after the detection of a failure...in such implementations, . . . because the protection bandwidth is only reserved and not allocated, ‘sharing’ can be supported.” Ex. 1006, [0060]; Ex. 2008, ¶¶42-47. Thus, like Dziong, Sathyanath teaches that bandwidth sharing is possible only when bandwidth in the link detour paths is reserved rather than allocated.

The teachings of both Dziong and Sathyanath are in stark contrast to the teachings of the '088 Patent, which, as discussed above, teaches “methods and systems for establishing a connection through a communication network, taking into account the ability to share bandwidth between the new connection and **existing connections**.” Ex. 1001, 2:13-17 (emphasis added). In other words, the '088 Patent teaches sharing allocated bandwidth between existing connections. *Supra* Section V.A; Ex. 1001, 2:18-19 (the “sharing definition defines connections that may share their bandwidth allocation” with the new connection). Dziong and Sathyanath, on

the other hand, teach the sharing of reserved bandwidth between link detour paths, which do not come into existence until there is a link failure. Ex. 2008, ¶47.

C. Petitioner's Cited References Fail to Render Obvious Independent Claims 1, 8, 15, and 17

The proposed combination of Dziong and Sathyanath fails to render obvious the challenged claims. As discussed further below, neither Dziong nor Sathyanath teach the methods outlined in the '088 Patent and, thus, Petitioner fails to show a "reasonable likelihood" that independent claims 1, 8, 15 and 17 are obvious under Ground 1, the only basis for Petitioner's challenge to these claims. 35 U.S.C. § 314(a).

1. **The Combination of Dziong and Sathyanath does not disclose "providing a sharing definition specifying one or more other connections, which have respective bandwidths and which are permitted to share a bandwidth allocation with the new connection, such that a total bandwidth allocated jointly to the new connection and to the other connections in any given segment is equal to a maximum of the requested bandwidth and of the bandwidths of the other connections in the given segment" (claim limitations [1.2]-[1.3], [8.4]-[8.5], [15.6]-[15.7], [17.3]-[17.4])**

Petitioner fails to show that the combination of Dziong and Sathyanath teaches a "sharing definition specifying one or more other connections, which have respective bandwidths and which are permitted to share a bandwidth *allocation* with the new connection." Ex. 1001, claim 1.2 (emphasis added)

The claims and specification of the '088 Patent make clear that "the one or more connections" specified by the sharing definition are *existing connections*, rather than potential connections that can be formed to carry traffic in the event of a

failure. Ex. 2008, ¶¶57-60. For example, the sharing definition, as taught by the '088 Patent, “states that the new connection may share the bandwidth with an *existing connection* traversing at least one common segment along the preferred route, and establishing the new connection includes sharing a *bandwidth allocation* in the at least one common segment between the new connection and the *existing connection*.” Ex. 1001, 3:4-10 (emphasis added).

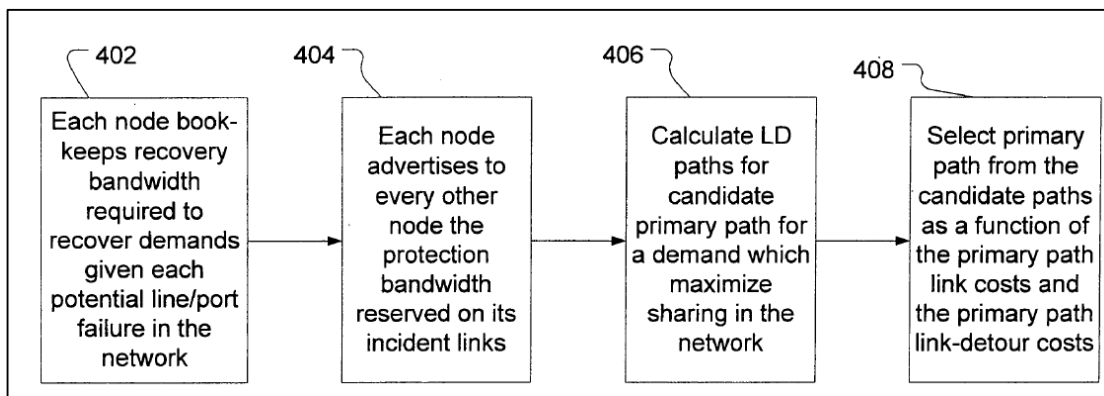
In fact, in distinguishing the '088 Patent from prior art routing protocols, the specification emphasizes that the prior art “protocols generally do not take into account dependencies between the newly-established connection and *previously-existing connections*, such as the ability to share bandwidth allocation between the connections.” *Id.*, 5:26-30 (emphasis added). The '088 Patent does not teach, or even mention, “reserved bandwidth.” This is because the primary concern of '088 Patent is the efficient distribution and sharing of resources between active, existing connections so as to minimize additional bandwidth allocation, rather than failure protection that draws on reserved bandwidth when an active link fails. Ex. 2008, ¶58.

By contrast, the primary concern for both Dziong and Sathayanath is failure protection that relies on bandwidth reservation, not allocation, across links. Ex. 2008, ¶¶61-62. And thus, neither teach the “sharing definition” as claimed by the '088 Patent, which requires that “establishing the new connection includes sharing

a **bandwidth allocation** in the at least one common segment between the new connection and the **existing connection**.” Ex. 1001, 3:4-10; Ex. 2008, ¶61.

In Dziong, the link detour paths that Petitioner points to in support of its arguments that the proposed combination discloses limitation [1.2] are not even established until there is a failure. Pet., 34; Ex. 1005, [0060]; Ex. 2008, ¶63. Dziong clearly states that, “[t]his information [including how much bandwidth can be-shared at each link] is obtained by advertising, across the network, the amount of bandwidth reserved for recovery on each link and by bookkeeping, in each node, information about all recovery paths that **would be activated when a protected link fails**.” Ex. 1005, [0060] (emphasis added). Thus, Dziong requires there to be a failure before the path would actually be activated. Ex. 2008, ¶¶63-65.

Dziong does not disclose establishing paths before a failure. For example, Figure 4 of Dziong, reproduced below, which depicts a process for calculating primary paths and link-detour (LD) paths, simply shows that “each node in the network does bookkeeping for each of its incident links of the amount of protection bandwidth that is needed to recover service in the event of each potential link failure in the network,” but does not teach that any of these paths are actually established prior to link failure. *Id.*, [0063]. Step 404 shown in Figure 4 further highlights that the protection bandwidth is merely “reserved on [the] incident links.” *Id.*, Fig. 4; Ex. 2008, ¶¶39-41.



Id., Fig. 4.

This aligns with the primary purpose of Dziong's invention, which is to set aside a certain bandwidth pool that can be tapped into in the event an existing connection fails. Ex. 2008, ¶41. Because this bandwidth is not actually allocated to any active connection, it exists in a fluid state and can be shared between connections in the event of a failure. *Id.*

This analysis is further confirmed by Sathyanath, which Petitioner specifically points to as “supplemen[ting] Dziong by describing many ways that bandwidth sharing information is maintained and shared.” Pet., 36. Sathyanath's teachings draw an explicit distinction between “reserved bandwidth” and “allocated bandwidth.” Ex. 1006, [0060]. Sathyanath explains that “[i]f the bandwidth [for protection paths] were allocated in advance of a failure, this would correspond, in the parlance of the field of protection and restoration for optical transport networks, to a 1:1 protection scheme.” *Id.*; see also, Ex. 2011, 3:45-51. Sathyanath teaches that ***allocated bandwidth cannot be shared*** because it is already assigned to a path, and so,

Sathyanath shows a preference for only **reserving** bandwidth so that the unallocated bandwidth can be used for other purposes. Ex. 1006, [0060] (“Further, because the protection bandwidth is only reserved and not allocated, ‘sharing’ can be supported, as defined below.”); Ex. 2008, ¶¶43-46, 64. Thus, Sathyanath teaches that sharing bandwidth between link detour paths is only an option for paths that have **reserved** and **not allocated** bandwidth.

Moreover, neither reference teaches bandwidth sharing in existing, active connections, as disclosed by the '088 Patent. This was confirmed by Petitioner's expert who stated that bandwidth on Dziong's active link is working bandwidth and cannot be shared with other links. *See*, Ex. 2010, 59:5-25.

Q: When you say “it has its own support for communications,” you're referring to the working demands that are on link A-B?

A: That is correct. So it's not solely for bandwidth sharing, for protection. It has other tasks too.

Q: and the link – the bandwidth that's used for these other tasks, which Dziong says is 12 units in this example—

A: Correct.

Q: – that bandwidth is not shared with the other links that are on that connection, right?

A: It is so obvious, yes. It's so obvious from Figure 6b.

In Figure 6b, I was trying to make a point before this discussion started.

P-XC, the Column P-XC, shows exactly the support, the working bandwidth, 12, which is separated from the other parts of the bandwidth sharing.

Dr. Mir further confirmed that the bandwidth sharing discussed by Dziong relates only to the “recovery paths” in Dziong and not the “working paths” or “primary paths” as required by the '088 Patent. Ex. 2010, 64:7-:66:7.

Thus, Dziong and Sathyanath neither separately nor together teach the “sharing definition” as contemplated by the '088 Patent. As discussed above, this is because the purpose of these patents and the network configurations within which they operate are fundamentally different from the invention disclosed in the '088 Patent. *See Supra* Sections V.A-V.B. The '088 Patent seeks to maximize efficiency in a network by allowing existing connections to share bandwidth with new connections, whereas Dziong and Sathyanath are directed to allowing existing connections to share a pool of bandwidth in case of a failure. These processes are not the same, and Petitioner fails to reconcile these differences.

Thus, the combination of Dziong and Sathyanath does not disclose or render obvious limitations [1.2]-[1.3], [8.4]-[8.5], [15.6]-[15.7], [17.3]-[17.4].

Accordingly, for the above reasons, Petitioner has failed to establish that Dziong and Sathyanath render obvious the claims challenged in Ground 1.¹

D. The Combination of Dziong and Sathyanath Fails to Render

¹ As Grounds 2 challenges only dependent claims, the fact that Dziong and Sathyanath fail to render obvious the claims in Ground 1 equally applies to the claims in Grounds 2.

Obvious Dependent Claims 4, 11, and 20

Dependent Claims 4, 11, and 20 all claim the “sharing definition” as taught by the '088 Patent. For the reasons outlined above, Dziong and Sathyanath fail to render obvious the “sharing definition” taught by these claims.

1. **Claim 4: The method according to claim 1, wherein the new connection and at least one of the other connections specified in the sharing definition traverse at least one common segment along the preferred route, and wherein establishing the new connection comprises allocating the maximum of the requested bandwidth and of the bandwidths of the at least one of the other connections in the at least one common segment to the new connection and to the at least one of the other connections. (claims 11 and 20)**

As discussed above, the '088 Patent teaches bandwidth sharing between a new connection and **existing** connections. Claims 4, 11, and 20 further exemplify this by claiming that the new connection and the existing connection share a common segment. Neither Dziong nor Santhyanath teach established connections, but instead teach potential connections that are activated in the event of a failure on a primary link. Ex. 2008, ¶66; *supra* Section V.B.

Petitioner relies on Figures 6a and 6b of Dziong, and claims that connection “AB,” along which the fabricated “new connection,” SRLG 4 shares a path with protection paths SRLG3 and SRLG5, is the “one common segment along the preferred route.” Pet., 57. As an initial matter, Dziong does not teach the establishment of a “new connection,” the treatment of SLRG 4 as a “new connection” is entirely fabricated by Petitioner's expert. Ex. 1003, 38; Ex. 2010, 69:9-16. Furthermore, SRLG3, SRLG4 and SRLG5 not protection paths but instead

are link groups which can individually fail resulting in the activation of multiple protection paths. Ex. 2008, ¶¶51-52, 67; *see also*, Ex. 2012, 181. As taught by Dziong, these protection paths are not activated unless there is a failure on the primary working path. Ex. 1005, [0089]-[0090]. These unestablished protection paths do not share reserved bandwidth with the working path on link AB as taught by the '088 Patent, but rather share reserved bandwidth with each other. Ex. 2008, ¶67. This does not render obvious claims 4, 11 and 20.

Figure 17 of Sathyanath, also relied on by Petitioner for this claim, relates to potential recovery paths rather than existing paths. Pet., 57. Petitioner points to L5 from Figure 17 as a “common segment along the preferred route,” (*id.*) however, L5 is not an existing connection with allocated bandwidth, but rather is a potential connection with reserved bandwidth that is activated when there is a link failure. Ex. 1006, [0222] (noting that L5 has “4 units” of “reserved” bandwidth.); Ex. 2008, ¶68. Thus, Sathyanath does not render these claims obvious.

Thus, claims 4, 11 and 20 are not rendered obvious by Dziong and Sathyanath.

VI. CONCLUSION

For the foregoing reasons, the Board should find the '088 Patent valid and not obvious.

IPR2024-01450
Patent Owner's Response

Date: July 25, 2025

Respectfully submitted,

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CERTIFICATION UNDER 37 C.F.R. § 42.24(d)

This Preliminary Response complies with 37 C.F.R. § 42.24(b)(2). As calculated by the “Word Count” feature of Microsoft Word 2010, it contains 3,514 words, excluding the words contained in the following: Table of Contents, Table of Authorities, List of Exhibits, Certification Under 37 C.F.R. § 42.24(d), and Certificate of Service.

Date: July 25, 2025

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies service of PATENT OWNER'S RESPONSE on the counsel of record for the Petitioner by filing this document through the P-TACTS platform on July 25, 2025 and served a true and correct copy of the foregoing by electronic mail on the following counsel:

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