

Case IPR2014-00809
Patent 7,265,792

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SILICON LABORATORIES, INC.
Petitioner

v.

CRESTA TECHNOLOGY CORPORATION
Patent Owner

Case IPR2014-0809
Patent 7,265,792

**EX 2051 SECOND DECLARATION OF ION E. OPRIS PH.D.
REGARDING EX 2050**

**Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450**

I. BACKGROUND FOR THIS DECLARATION

1. I am the same Ion E. Opris that gave the first declaration of Ion E. Opris, Ex 2003. The statements I make below are based upon my personal knowledge.

II. THE HSP43220 DECIMATING DIGITAL FILTER

2. On 1/23/2015, I personally downloaded from URL <http://pdf.datasheetcatalog.com/datasheet/intersil/fn2486.pdf> the document now marked as Ex 2050. Upon examining Ex 2050, I noticed that page 1 of such document contains a copyright notice, "Copyright © Intersil Corporation 2000."

Also, in an affidavit, now marked as Ex 2052, Christopher Butler, an office manager at the Wayback Machine Internet Archive, testified that the webpage

<https://web.archive.org/web/20000622154154/http://www.intersil.com/data/fn/fn2/fn2486/index.asp>, printed as part of Exhibit A on pages 5-6 of Ex 2052, contains a link displayed as "FN2486.pdf", associated with the subject "Decimating Digital Filter" under the category of "Datasheets". Clicking this link directs the user to the URL

<https://web.archive.org/web/20031122101225/http://www.intersil.com/data/fn/fn2/fn2486/fn2486.pdf>.

In Ex 2052, Christopher Butler further testified that the URL

<https://web.archive.org/web/20031122101225/http://www.intersil.com/data/fn/fn2/>

fn2486/fn2486.pdf in turn redirects to the URL

<https://web.archive.org/web/20031005130349/http://www.intersil.com/data/fn/fn2486.pdf>, printed as part of Exhibit A on pages 7-25 of Ex 2052.

In his conclusion, Christopher Butler testified in Ex 2052 that, the above-mentioned “FN2486.pdf” link, posted on a record for the URL

<http://www.intersil.com/data/fn/fn2/fn2486/index.asp> with timestamp June 22, 2000 15:14:54 GMT, directs to the URL

<http://www.intersil.com/data/fn/fn2/fn2486/fn2486.pdf>.

3. I concluded after reading Chris Butler’s testimony in Ex 2052 and comparing the document located as part of Exhibit A on pages 7-25 of Ex 2052 that this document is the same document as the document now marked as Ex 2050.

I further concluded after reading Christopher Butler’s testimony that a person seeking access to the document now marked as Ex 2050, was able to access such document back in the year 2000.

4. On 1/23/2015, I accessed the URL <http://www.intersil.com/en/about-intersil/about-company-information.html>. On this URL I read that Intersil was formed in August 1999 when Intersil acquired the semiconductor business of Harris Corporation and began operating as Intersil Corporation. I also found that the base URL, [intersil.com](http://www.intersil.com), is registered to company Intersil Corporation by

checking the Whois database of intersil.com at URL

<https://who.is/whois/intersil.com>.

5. In light of my above observations and after comparing the Harris HSP43220 DDF shown in Figure 4 of Ex 1005 and elsewhere in Ex 1005 with the HSP43220 Decimating Digital Filter described in Ex 2050, it is my opinion that the two HSP43220 parts are one and the same part. I also base my opinion on the following observations regarding the HSP43220 described in Ex 1005 and Ex 2050.

6. Ex. 1005 describes HSP43220 and is originated by Harris, while Ex. 2050 describes also HSP43220 and is originated by Intersil. The part numbers are identical, and it is public knowledge that Intersil was formed in August 1999 through the acquisition of the semiconductor business of Harris Corporation. The block diagram shown in Ex. 1005 (Fig. 4) is similar to the block diagrams shown in Ex. 2050 (p. 3-1, p.3-5, p.3-11). The two Exhibits call the HSP43220 by the same name (“Digital Decimation Filter”). The FIR filters in both Exhibits have 512 taps (Ex. 1005, Fig. 4 and Ex. 2050, p. 3-1).

7. On 1/23/2015 I personally downloaded from URL <http://web.archive.org/web/19970710210607/http://www.semi.harris.com/data/fn/fn2/fn2486/fn2486.pdf>

the document now marked as Ex 2054.

In an affidavit, now marked as Ex 2053, Christopher Butler, an office manager at the Wayback Machine Internet Archive, testified that the webpage

<http://web.archive.org/web/19970709212238/http://www.semi.harris.com/data/fn/fn2/fn2486/index.htm>, printed as part of Exhibit A on pages 5-6 of Ex 2053, contains a link displayed as “fn2486.pdf”, associated with the subject “Decimating Digital Filter” under the category of “Datasheets”. Clicking this link directs the user to the URL

<http://web.archive.org/web/19970710210607/http://www.semi.harris.com/data/fn/fn2/fn2486/fn2486.pdf>, printed as part of Exhibit A on pages 8-26 of Ex 2053.

In his conclusion, Christopher Butler testified that the above-mentioned “FN2486.pdf” link, posted on a record for the URL

<http://www.intersil.com/data/fn/fn2/fn2486/index.asp> with timestamp July 7, 1997 21:22:38 GMT, directs to the URL

<http://www.semi.harris.com/data/fn/fn2/fn2486/fn2486.pdf>.

8. I concluded after reading Chris Butler’s testimony in Ex 2053 and comparing the document located as part of Exhibit A on pages 7-25 of Ex 2053 that this document is the same document as the document now marked as Ex 2054.

I further concluded after reading Christopher Butler's testimony that a person seeking access to the document now marked as Ex 2054, was able to access such document back in the year 1997.

9. Upon reading the document now marked as Ex 2054 I saw that the document is a Harris data sheet dated December 1996 that describes HSP43220.

10. Ex 2054 discloses the substantially the same information that I relied on for Ex 2050. In particular, in paragraph 108 of my declaration, Ex 2003, ¶82, I pointed to HSP43220 datasheet, (Ex. 2050, p1.) the Harris HSP43220 DDF is not a bandpass filter but instead "a linear phase low pass decimation filter" which is optimized for filtering narrow band signals." Ex. 2054 page 1 shows that the Harris HSP43220 DDF is not a bandpass filter but instead "a linear phase low pass decimation filter" which is optimized for filtering narrow band signals." Ex. 2054, p1.

11. In paragraph 83 of my declaration, I state that there is no provision for adaptively changing the coefficients while maintaining uninterrupted, proper filter operation citing Ex. 2050, figures 1, 2 and 3. Ex. 2054 shows the same figures 1, 2, and 3.

12. In paragraph 83 of my declaration, I state that the coefficients of the HSP 43220 filter are fixed once they are loaded relying on the statement, "The

coefficients are loaded into the Coefficient RAM over the control bus (C_BUS)," on page 9 of Ex. 2050. Ex 2054 has the same disclosure on page 10.

13. In paragraph 84 of my declaration, I state that the sole purpose of the microprocessor interface is to preload the coefficients into the Harris DDF control register shown in Figure 5 citing Ex. 2050, Fig. 5 and pages 9-10 and I further state that the microprocessor interface cannot be used to load the coefficient during the operation of the Harris DDF while providing an uninterrupted, proper filter operation. Ex 2054 shows the same Figure 4 has the same disclosure on pages 10 and 11.

14. In my opinion, a POSITA would have known the Harris HSP43220 DDF described in Ex 1005 is the Harris HSP43220 DDF described in the September 2000 Intersil HSP43220 data sheet, Ex. 2050, sold by Intersil Corporation the successor in interest to the semiconductor business of Harris Corporation and the Harris HSP43220 DDF described in the December 1996 Harris HSP43220 data sheet, Ex. 2054, sold by Harris Corporation at the time of the '585 patent invention.

Respectfully submitted

Signed in San Jose, California on January 29, 2015

/Ion E. Opris/

Ion E. Opris, Ph.D.