Filed on behalf of Patent Owner Network-1 Security Solutions, Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AVAYA INC. and DELL INC. Petitioner

v.

NETWORK-1 SECURITY SOLUTIONS, INC.
Patent Owner

Case IPR2013-00071¹
Patent 6,218,930
Administrative Patent Judges Jameson Lee, Joni Y. Chang and Justin T. Arbes

DECLARATION OF DR. JAMES KNOX

¹ IPR2013-00385 has been joined with this proceeding.



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	C.	"data network"				
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		2. Reason 2: The current disclosed in Matsuno is not below a threshold that will not damage a device that is not capable of accepting remote power	58			
	В.	Matsuno does not disclose the claimed "sensing a voltage level on the data signaling pair."				
	C.	Matsuno does not disclose Claim 9				
		1. <u>Reason 1</u> : Matsuno does not teach anything about the "removal of the access device" when "power from the				
		secondary power source" is being delivered	69			



		2.	level drops on the data signaling pair."	78			
		3.	Reason 3: Had (a) Claim 9 been drafted differently (<i>i.e.</i> , "across" rather than "on" the data signaling pair), and (b) Matsuno taught the removal of the access device when the secondary power is being delivered (it does not), Matsuno would not teach but rather would teach away from the voltage level dropping across the data signaling pair if the access device were removed.	78			
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