

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

NETWORK-1 SECURITY SOLUTIONS, INC., a
Delaware corporation,

Plaintiff,

vs.

Alcatel-Lucent USA Inc., a Delaware corporation;
Alcatel-Lucent Holdings Inc., a Delaware
corporation; Allied Telesis, Inc., a Delaware
corporation; Avaya Inc., a Delaware corporation;
Axis Communications AB, a Swedish corporation;
Axis Communications, Inc., a Massachusetts
corporation; Dell Inc., a Delaware corporation;
GarrettCom, Inc., a California corporation; Hewlett-
Packard Company, a Delaware corporation; Huawei
Technologies Co., Ltd., a People's Republic of China
corporation; Huawei Technologies USA Inc., a
Texas corporation; Juniper Networks, Inc., a
Delaware corporation; NEC Corporation, a Japanese
corporation; NEC Corporation of America, a
Delaware corporation; Polycom, Inc., a Delaware
corporation; Samsung Electronics Co., Ltd., a South
Korean corporation, Samsung Electronics America,
Inc., a New York corporation; Samsung
Telecommunications America, LLC, a Delaware
limited liability company; ShoreTel, Inc., a Delaware
corporation; Sony Corporation, a Japanese
corporation, Sony Corporation of America, a New
York corporation; Sony Electronics Inc., a Delaware
corporation;

Defendants.

CASE NO. 6:11-cv-492

JURY DEMANDED

**Plaintiff Network-1 Security Solutions, Inc.'s Disclosure of Asserted Claims and
Infringement Contentions under Patent Rule 3-1.**

Pursuant to Patent Rule 3-1, Plaintiff Network-1 Security Solutions, Inc. (“Network-1”) submits the following Disclosure of Asserted Claims and Infringement Contentions.

This disclosure is based on the information available to Network-1 as of the date of this disclosure, and Network-1 reserves the right to amend this disclosure to the full extent consistent with the Court’s Rules and Orders.

I. Patent Rule 3-1(a): Asserted Claims

Plaintiff Network-1 asserts that:

- Alcatel-Lucent USA Inc. and Alcatel-Lucent Holdings Inc. (“Alcatel”) infringes one or more of the following claims of United States Patent No. 6,218,930 entitled “Apparatus And Method For Remotely Powering Access Equipment Over A 10/100 Switched Ethernet Network” (the “’930 Patent”), directly, contributorily, and by inducement: claims 6 and 9;
- Avaya Inc. (“Avaya”) infringes one or more of the following claims of the ‘930 Patent, directly, contributorily, and by inducement: claims 6 and 9;
- AXIS Communications AB and AXIS Communications, Inc. (“Axis”) infringes one or more of the following claims of the ‘930 Patent, directly, contributorily, and by inducement: claims 6 and 9;
- Dell Inc. (“Dell”) infringes one or more of the following claims of the ‘930 Patent, directly, contributorily, and by inducement: claims 6 and 9;
- Hewlett-Packard Company (“HP”) infringes one or more of the following claims of the ‘930 Patent, directly, contributorily, and by inducement: claims 6 and 9;
- Juniper Networks, Inc. (“Juniper”) infringes one or more of the following claims of the ‘930 Patent, directly, contributorily, and by inducement: claims 6 and 9;

- Polycom, Inc. (“Polycom”) infringes one or more of the following claims of the ‘930 Patent, directly, contributorily, and by inducement: claims 6 and 9;
- Samsung Electronics Co., Ltd., Samsung Electronics America, and Samsung Telecommunications America, LLC (“Samsung”) infringes one or more of the following claims of the ‘930 Patent, directly, contributorily, and by inducement: claims 6 and 9;
- ShoreTel, Inc. (“ShoreTel”) infringes one or more of the following claims of the ‘930 Patent, directly, contributorily, and by inducement: claims 6 and 9; and
- Sony Corporation, Sony Corporation of America, and Sony Electronics Inc. (“Sony”) infringes one or more of the following claims of the ‘930 Patent, directly, contributorily, and by inducement: claims 6 and 9.

Claims 6 and 9 are collectively referenced as the “Asserted Claims.” Alcatel, Avaya, Axis, Dell, HP, Juniper, Polycom, Samsung, ShoreTel, and Sony are collectively referenced as the “Defendants.”

II. **Patent Rule 3-1(b): Accused Instrumentalities of which Network-1 is aware.**

Plaintiff Network-1 asserts that the Asserted Claims are infringed by the following products and products that are reasonably similar to the following: all

- (a) power sourcing equipment (data nodes, *e.g.*, switches), and
- (b) powered devices (access devices, *e.g.*, phones (*e.g.*, IP phones), wireless access points, cameras (*e.g.*, security cameras), magnetic card readers, video kiosk, *etc.*)

made, sold, offered for sale, or used by each Defendant which is used as part of an apparatus or method to control the delivery of power, over at least one data signaling pair, from power

sourcing equipment (data nodes) to a powered device (access device) including, but not limited to, doing so consistent with the IEEE 802.3af and 802.3at standards¹ (“Accused Instrumentalities”) including the following:

- (i) Alcatel products and services including, but not limited to, (a) power sourcing equipment (data nodes, *e.g.*, switches), (b) powered devices (access devices, *e.g.*, IP phones, wireless access points), and (c) related equipment (*e.g.*, power supplies) used as part of an apparatus or method to deliver power, over at least

¹ The power sourcing equipment (data nodes) and powered devices (access devices) made, used, sold, and offered for sale by the Defendants support and comply with the IEEE 802.3af and IEEE 802.3at standards. *See, e.g.*,

- Alcatel: “IEEE Standards – IEEE 802.3af (Power-over-Ethernet)” (OmniSwitch 9800 Technical Info) [N200062];
- Avaya: “The Nortel Ethernet Routing Switch 4500 Series 4548GT-PWR and the 4526GTX-PWR (PoE switches) provide IEEE 802.3af-compliant power or PoE on all 10/100/1000 RJ-45 ports.” (Nortel Ethernet Routing Switch 4500 Series Configuration Guide) [N200525];
- Axis: “Power over Ethernet* (IEEE 802.3af), eliminating the need for power cables and reducing installation costs.” (AXIS P1343-E Features) [N202615];
- Dell: “IEEE Compliance – 802.3af Power over Ethernet” (Dell Force10 C150 Details) [N203528];
- HP: “Supports PoE power supply on 8 ports at the same time (IEEE 802.3af).” (HP A3000G QuickSpecs) [N205086];
- Juniper: “EX2200 and EX2200-C models are available with or without standards-based 802.3af Class 3 Power over Ethernet (PoE) for supporting networked devices such as telephones, video cameras, and wireless LAN (WLAN) access points.” (EX2200 Overview) [N207068];
- Polycom: “Use a standard PoE adapter or a PoE-enabled port on a switch adhering to PoE 802.3af when connecting the base station to a PoE power source.” (Polycom KIRK Wireless Server 6000 Installation Guide) [N207820];
- Samsung: “Since power is supplied through the LAN cables, there will be less complicated cabling and the installation cost will be substantially reduced (IEEE 802.3af).” (SNC-550 Brochure) [N209958];
- Shoretel: “Built-in 10/100/1000 Ethernet switch 802.3af PoE (standard), or local power (optional)” (ShoreTel IP Phone 655 Features) [N 210006];
- Sony: “The SNC-DF Series supports the 802.3af PoE standard, allowing for reduced infrastructure wiring costs and installation time.” (SNC-DF Series Brochure) [N 210113].

one data signaling pair, from power sourcing equipment (data nodes) to a powered device (access device), including doing so consistent with the IEEE 802.3af and 802.3at standards, that is used, made, sold, or offered for sale by Alcatel, and all reasonably similar products (“Alcatel Accused Instrumentalities”), including:

power sourcing equipment (data nodes):

- Alcatel-Lucent OmniSwitch 9000 Chassis LAN Switch Series (including OmniSwitch 9800, OmniSwitch 9800E, OmniSwitch 9700, OmniSwitch 9600, OmniSwitch 9000E, OS9-IP-SHELF, OS9-GNI-P24E, OS9-GNI-P24, OS9-IPS-0230A PoE rack, and OS9-IPS-0390A);
- Alcatel-Lucent OmniSwitch 6000 Chassis LAN Switch Series (including OmniSwitch 6855, OmniSwitch 6855-P14, OmniSwitch 6855-14, OmniSwitch 6855-24, OmniSwitch 6850, OmniSwitch 6850-P24, OmniSwitch 6850-P24X, OmniSwitch 6850-P48, OmniSwitch 6850-P48X, OmniSwitch 6850-P245L, OmniSwitch 6850-P24L, OmniSwitch 6850E, OmniSwitch 6450-P24, OmniSwitch 6450-P48, OmniSwitch 6400-P24, and OmniSwitch 6400-P48);
- Alcatel-Lucent OmniStack 6200 Series (including OmniStack 6212P, OmniStack 6224P, OmniStack 6248P, and OmniSwitch 6250-P24);
- Alcatel-Lucent OmniAccess 6000 Series (including OmniAccess 6000, and OmniAccess 2GE24FP Line Card);
- Alcatel-Lucent OmniAccess 4000 Series (OmniAccess 4000, OmniAccess 4306, OmniAccess 4308, and OmniAccess 4324);
- Alcatel-Lucent 9362 Enterprise Cell V2.2 2100MHZ; and

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