

1 UNITED STATES PATENT AND TRADEMARK OFFICE  
2 BEFORE THE PATENT TRIAL AND APPEAL BOARD

3 ORACLE CORPORATION, §  
4 NETAPP INC. AND HUAWEI §  
5 TECHNOLOGIES CO., LTD. §  
6 §  
7 Petitioners, § IPR2014-01197  
8 § IPR2014-01207  
9 VS. § IPR2014-01209  
10 §  
11 §  
12 CROSSROADS SYSTEMS, §  
13 INC. §  
14 §  
15 Patent Owner. §

16 ORAL AND VIDEOTAPED DEPOSITION OF  
17 JOHN LEVY, PH.D.  
18 JULY 16, 2015  
19 CONFIDENTIAL PROTECTIVE ORDER MATERIAL  
20 VOLUME 2 OF 2

21 ORAL AND VIDEOTAPED DEPOSITION OF JOHN LEVY, PH.D.,  
22 produced as a witness at the instance of the Petitioners  
23 and duly sworn, was taken in the above styled and numbered  
24 cause on Thursday, July 16th, 2015 from 9:01 a.m. to  
25 2:04 p.m., before Tamara Chapman, CSR, RPR, CCR (LA) in  
and for the State of Texas, reported by computerized  
stenotype machine, at the offices of Sprinkle IP, 1301  
West 25th Street, Suite 408, Austin, Texas.

Job No: 95252

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A P P E A R A N C E S

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Mr. Brent Kirby - The Videographer

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1 J. LEVY-7/16/15-CONFIDENTIAL PROTECTIVE ORDER MATERIAL

2 THE VIDEOGRAPHER: This is Tape No. 1.

3 We're recording and on the record. 9:01 a.m.

4 EXAMINATION

5 BY MR. GARDELLA:

6 Q. Welcome back, Dr. Levy.

7 A. Thank you.

8 Q. Did you speak with counsel about the substance of  
9 your testimony since we closed yesterday?

10 A. No, I did not.

11 Q. I'd like to next ask some questions about the  
12 Hirai reference. Do you have that in front of you?

13 A. I will in a moment.

14 Okay.

15 Q. So -- and my questions are going to relate to the  
16 create and delete commands and the applicability that they  
17 might have to certain activities.

18 A. All right.

19 Q. So in the context of partition control in the  
20 Hirai system, is it fair to say that an administrator  
21 station on the host side could use create and delete  
22 commands?

23 MR. HALL: Objection; foundation, form.

24 Q. (BY MR. GARDELLA) Do you understand the  
25 question?

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2 A. Well, let's see.

3 Q. Well, do you understand the question, though,  
4 before we proceed?

5 A. I am going to address that.

6 Q. Okay. Sorry.

7 A. Hirai does not actually talk about create and  
8 delete commands. He -- he only dis- -- says a personal  
9 computer can read, write, create and execute with  
10 partition 1 and so on. If that action of a personal  
11 computer, read, write, create and execute, is what you're  
12 referring to, then we can proceed from there.

13 Q. Just to make sure we're on the same page, what  
14 paragraph of Hirai are you reading from?

15 A. That's in Paragraph 13.

16 Q. So how do you understand that sentence in -- in  
17 terms of what read, write, create and execute are  
18 referring to?

19 MR. HALL: Objection; form.

20 A. Well, since the access rights spoken about in  
21 Paragraph 12, which include, read, write, create, delete  
22 and execute, are well-known file system access rights, I  
23 understand the statement that a personal computer 2 can  
24 read, write, create and execute with Partition 1 to mean  
25 that a program running in personal computer -- I said 2 --

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