

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**ORACLE CORPORATION, NETAPP INC. and
HUAWEI TECHNOLOGIES CO., LTD.,**
Petitioner,

v.

CROSSROADS SYSTEMS, INC.
Patent Owner.

U.S. Patent No. 7,051,147

Case No. IPR2014-01207

**AFFIDAVIT OF AARON Y. HUANG IN SUPPORT OF
MOTION FOR *PRO HAC VICE* ADMISSION**

I, Aaron Y. Huang, being duly sworn and upon oath, hereby attest to the following:

1. I am a member in good standing of the Bar of California. I was admitted to the California State Bar on January 5, 2009. My California Bar membership number is 261903. I am admitted to practice before the U.S. District Courts of the Northern District of California and Eastern District of Texas. I am also admitted to practice before the U.S. Court of Appeals for the Federal Circuit. During the entire time that I have been practicing law, my practice has been focused on the field of intellectual property, particularly patent litigation.
2. I have never been suspended or disbarred from practice before any court or administrative body.
3. I have never had a court or administrative body deny my application for admission to practice.
4. I have never had any sanctions or contempt citations imposed on me by any court or administrative body.
5. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of 37 C.F.R.
6. I agree to be subject to the United States Patent and Trademark Office Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et seq.*, and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

7. In the past three years, I have not appeared *pro hac vice* in any proceeding before the United States Patent and Trademark Office.

8. I am an experienced litigation attorney, with experience in litigations involving patent infringement in District Courts across the country, including experience with fact and expert document and deposition discovery, claim construction, *Markman* hearings, motion practice, trials, and hearings.


9. I am counsel for Oracle Corporation (“Oracle”), Petitioner and the defendant in a related pending litigation in the United States District Court for the Western District of Texas, in which U.S. Patent No. 7,051,147 is and was asserted by the Patent Owner. (*Crossroads Systems, Inc. v. Oracle Corp.*, W.D. Tex. Case No. 13-895-SS.) I am familiar with the subject matter at issue in this proceeding as a result of my representation of Oracle in the related litigation, including the alleged prior art that Petitioner presents in this proceeding, as well as issues of claim construction. For example, I have taken and defended depositions of expert witnesses on claim construction issues, and I have participated in the briefing and hearing on claim construction in the related litigation. I am familiar with the invalidity defenses raised in the related litigation and have reviewed and am familiar with prior art raised in this proceeding, including CRD-5500 SCSI RAID Controller User’s Manual (1996) (Ex. 1003); CRD-5500 SCSI RAID Controller Data Sheet (Dec. 4, 1996) (Ex. 1004); Smith et al., *Tachyon: A Gigabit Fibre*

Channel Protocol Chip, HEWLETT-PACKARD J. (Oct. 1996) (Ex. 1005); U.S. Patent No. 6,219,771 (Ex. 1006); U.S. Patent No. 6,073,209 (Ex. 1007); and JP Patent Application Pub. No. Hei 5[1993]-181609 (Ex. 1008). I have reviewed the briefs and papers filed in this proceeding and in *inter partes* review proceedings involving related patents.

I declare that all statements made herein of my own knowledge are true and correct.

Respectfully submitted,

Dated: August 25, 2015



Aaron Y. Huang