

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

Case IPR2014-01209
Patent No. 7,051,147

**DECLARATION OF SCOTT S. CROCKER IN SUPPORT OF
PATENT OWNER'S UNOPPOSED MOTION FOR
PRO HAC VICE ADMISSION OF SCOTT S. CROCKER**

I, Scott S. Crocker, make the following declaration based on my own personal knowledge:

1. I am a partner in the law firm of Sprinkle IP Law Group, P.C. My fellow partner, Steve Sprinkle is lead counsel for Crossroads Systems, Inc. (“Crossroads”) in this proceeding, related *inter partes* review proceedings before the Board, and several patent suits that are presently pending in the Western District of Texas.

2. I was admitted to practice before the Supreme Court of Texas in 1994 and I am a member in good standing of the Texas State Bar. I am also admitted to practice in the District Courts for the Western District of Texas, Northern District of Texas, and Eastern District of Texas.

3. I have never been suspended or disbarred by any court or administrative body.

4. I have never been denied an application for *pro hac vice* admission to practice before any court or administrative body.

5. No sanctions or contempt citations have been imposed against me by any court or administrative body.

6. 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.

7. I agree that I will be subject to the USPTO's 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).

8. I am concurrently applying for *pro hac vice* admission in the following proceedings before the USPTO:

- IPR2014-01197 (United States Patent No. 6,425,035) by Oracle Corporation, NetApp, Inc. and Huawei Technologies Co. Ltd.
- IPR2014-01207 (United States Patent No. 7,051,147) by Oracle Corporation, NetApp, Inc. and Huawei Technologies Co. Ltd.
- IPR2014-01226 (United States Patent No. 6,425,035) by Cisco Systems, Inc. and Quantum Corporation

9. I obtained my J.D. in 1994 from the University of Texas School of Law in Austin, Texas. I have been in civil litigation for over 20 years, and I have been litigating patent cases since 2006. I consider myself to be very familiar with the patent laws of the United States.

10. I have read Crossroads Systems' U.S. Patent No. 7,051,147, which is the patent under review in this proceeding. Ex. 1001. I have also read the Petition for *Inter Partes* Review in this proceeding, including the alleged prior art, the supporting Declaration of Jeffery S. Chase, Ph.D, and other exhibits. I have also

read Patent Owner's Preliminary Response and its associated exhibits. I have also read the Board's decision instituting *inter partes* review in this proceeding.

11. I am counsel of record for Crossroads in the following patent cases which relate to the patent under review:

- Crossroads Systems, Inc. v. Oracle Corporation
Case No. 1:13-CV-00895-SS (W.D. Tex.)
- Crossroads Systems, Inc. v. Huawei Technologies Co. Ltd. et al.
Case No. 1:13-CV-01025-SS (W.D. Tex.)
- Crossroads Systems, Inc. v. Cisco Systems, Inc.,
Case No. 1:14-CV-00148-SS (W.D. Tex.)
- Crossroads Systems, Inc. v. NetApp, Inc.,
Case No. 1:14-CV-00149-SS (W.D. Tex.)
- Crossroads Systems, Inc. v. Quantum Corporation,
Case No. 1:14-CV-00150-SS (W.D. Tex.)

12. Prior to becoming counsel of record in the above cases, I was involved in the Claim Construction process for the patent under review and other members of its patent family. I was involved in the preparation of arguments for Crossroads' Claim Construction Contentions as well as its presentation at the two-day hearing before a special master.

13. I have read the Report and Recommendation of the Special Master regarding Claim Construction in the above listed district court cases.

14. Through my involvement in the district court litigations and my own legal and technical research and consultations, I am familiar with the technology of the patent under review and the issues associated with this proceeding.

15. I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed this 25th day of February, 2015 at Austin, Texas.

/Scott S. Crocker/
Scott S. Crocker