

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

CROSSROADS SYSTEMS, INC. §
v. § C.A. NO. 1:13-cv-00800-SS
§
DOT HILL SYSTEMS CORP. §

CROSSROADS SYSTEMS, INC. §
v. § C.A. NO. 1:13-cv-00895-SS
§
ORACLE CORPORATION §

CROSSROADS SYSTEMS, INC. §
v. § C.A. NO. 1:13-cv-01025-SS
§
HUAWEI TECHS. CO., LTD., ET AL. §

CROSSROADS SYSTEMS, INC. §
v. § C.A. NO. 1:14-cv-00148-SS
§
CISCO SYSTEMS, INC. §

CROSSROADS SYSTEMS, INC. §
v. § C.A. NO. 1:14-cv-00149-SS
§
NETAPP, INC. §

CROSSROADS SYSTEMS, INC. §
v. § C.A. NO. 1:14-cv-00150-SS
§
QUANTUM CORPORATION §

**DEFENDANTS' JOINT OPENING BRIEF ON
COMMON CLAIM CONSTRUCTION ISSUES**

TABLE OF CONTENTS

I. INTRODUCTION1

II. COMMON TERMS AND PHRASES.....1

A. “Map[ping]” (’035, ’147, ’041, and ’311 Patents).....1

 1. “Map[ping]” Requires Creating A Designated Path.....2

 a. A Designated Path Specifies Both A Particular Workstation
 And A Particular Remote Storage Device3

 b. A Designated Path Must Be Created And Known By The
 Storage Router Prior To The Storage Router Controlling
 And Allowing Access According To The Path.....6

 2. “Mapping” Requires Creating A Path For Block-Level
 Communications9

B. “Storage Router” (’035, ’147, ’041, and ’311 Patents).....11

 1. “Storage Router” Should Be Construed Consistently With The
 Well-Understood Meaning of “Router” In The Field12

 2. The Intrinsic Record Establishes That A Storage Router Is A
 Router That Routes Storage Requests And Data Between Initiator
 Devices/Workstations And Target Storage Devices13

C. “Access Controls” (’035 and ’147 Patents)17

D. “Allow[ing] Access From [The Device/Devices/Workstations/Fibre
 Channel Initiator Devices] To The [Remote] Storage Device[s] Using
 Native Low Level, Block Protocols” (’035, ’147, and ’041 Patents)19

E. “Remote” (’035, ’147, ’041, and ’311 Patents)22

F. “Supervisor Unit” (’035 and ’147 Patents).....27

G. “Interface With” / “Interface Between” (’035, ’147, ’041, and ’311
 Patents).....29

H. “First [Fibre Channel] Transport Medium” / “Second [Fibre Channel]
 Transport Medium” (’035, ’147, ’041, and ’311 Patents)31

I. “In A Manner [That Is] Transparent To [...] The Devices” (’041 and ’311
 Patents).....32

J. “LUN” (’147 and ’311 Patents)33

K. “Storage Device[s]” (’035, ’147, ’041, and ’311 Patents).....34

III. CONCLUSION.....35

TABLE OF AUTHORITIES**Cases**

<i>ACCO Brands, Inc. v. Micro Security Devices, Inc.</i> , 346 F.3d 1075 (Fed. Cir. 2003).....	5
<i>Arlington Indus., Inc. v. Bridgeport Fittings</i> , 632 F.3d 1246 (Fed. Cir. 2011).....	27
<i>In re Coastal Plains, Inc.</i> , 179 F.3d 197 (5th Cir. 1999)	29
<i>Computer Docking Station Corp. v. Dell, Inc.</i> , 519 F.3d 1366 (Fed. Cir. 2008).....	5
<i>Cross Med. Prods., Inc. v. Medtronic Sofamor Danek</i> , 424 F.3d 1293 (Fed. Cir. 2005).....	27
<i>Crossroads Sys., Inc. v. Chaparral Network Storage, Inc., et al.</i> , Nos. 00-217 & 00-248, D.I. 27 at 15 (W.D. Tex. July 27, 2000).....	2, 12
<i>Crossroads Sys., Inc. v. DataDirect Networks, Inc.</i> , No. 08- 861, D.I. 149 at 17 (W.D. Tex. Oct. 6, 2009).....	33, 34
<i>Crossroads Sys., Inc. v. Dot Hill Sys. Corp.</i> , No. 03-754, D.I. 288 at 15 (W.D. Tex. Nov. 4, 2005).....	27, 28
<i>Crossroads Systems, Inc. v. 3Par, Inc., et al.</i> , No. 10-652, D.I. 179 at 13 (W.D. Tex. Nov. 8, 2011).....	18
<i>Elekia Instrument v. O.U.R. Sci.</i> , 214 F.3d 1302 (Fed. Cir. 2000).....	27
<i>Gammino v. Sprint Commc'ns Co., L.P.</i> , Nos. 2013–1636, 2014–1016, 2014 WL 3973503 (Fed. Cir. Aug. 15, 2014)	16
<i>New Hampshire v. Maine</i> , 532 U.S. 742 (2001).....	28
<i>Merck & Co. v. Teva Pharms. USA, Inc.</i> , 395 F.3d 1364 (Fed. Cir. 2005).....	27
<i>Microsoft Corp. v. Multi-Tech Sys. Inc.</i> , 357 F.3d 1340 (Fed. Cir. 2004).....	5
<i>Minn. Min. & Mfg. Co. v. Chemque, Inc.</i> , 303 F.3d 1294 (Fed. Cir. 2002).....	29

O2 Micro Int'l Ltd. v. Beyond Innovation Tech. Corp.,
521 F.3d 1351 (Fed. Cir. 2008).....11, 33

Phillips v. AWH Corp.,
415 F.3d 1303 (Fed. Cir. 2005) (en banc).....3, 4, 5

U.S. Surgical Corp. v. Ethicon, Inc.,
103 F.3d 1554 (Fed. Cir. 1997).....11

I. INTRODUCTION

Defendants Dot Hill Systems Corp., Oracle Corporation, Huawei Technologies Co., Ltd., Huawei Enterprise USA, Inc., Huawei Technologies USA, Inc., Cisco Systems, Inc., NetApp, Inc., and Quantum Corporation (collectively “Defendants”) respectfully submit this joint opening brief regarding the claim construction issues common to each of the above-captioned cases filed by Plaintiff Crossroads Systems, Inc. (“Crossroads”).¹

II. COMMON TERMS AND PHRASES

A. “Map[ping]” (’035, ’147, ’041, and ’311 Patents)

Defendants’ Proposed Construction	Plaintiff’s Proposed Construction
To create a designated path for block-level communications from a device on one side of the storage router to a remote storage device on the other side of the router. A “map” contains a representation of devices on each side of the storage router, so that when a device on one side of the storage router wants to communicate via block-level communications with a device on the other side of the storage router, the storage router can designate a path to connect the devices by routing requests and data between the devices.	To create a path from a device on one side of the storage router to a device on the other side of the router. A “map” contains a representation of devices on each side of the storage router, so that when a device on one side of the storage router wants to communicate with a device on the other side of the storage router, the storage router can connect the devices

The parties agree that the term “map[ping],” which appears in all of the claims of the Patents-in-Suit, refers to creating a path from a device on one side of the storage router to a device on the other side of the storage router. The parties also agree that a “map” contains a representation of devices on each side of the storage router, so that when a device on one side of the storage router wants to communicate with a device on the other side of the storage router, the storage router can connect the devices. Crossroads’s expert, Dr. John Levy, agreed at his

¹ The patents at issue are U.S. Patent Nos. 6,425,035 (the “’035 patent,” Ex. A), 7,051,147 (the “’147 patent,” Ex. B), 7,934,041 (the “’041 patent,” Ex. C), and 7,987,311 (the “’311 patent,” Ex. D) (collectively, the “Patents-in-Suit”). Specifically, Crossroads has asserted: the ’035 patent against Dot Hill Systems Corp.; the ’035, ’147, and ’041 patents against Oracle Corporation, Huawei Technologies Co., Ltd., Huawei Enterprise USA, Inc., Huawei Technologies USA, Inc., Cisco Systems, Inc., and Quantum Corporation; and the ’035, ’147, ’041, and ’311 patents against NetApp, Inc.

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