

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioners,

v.

CROSSROADS SYSTEMS, INC.

Patent Owner.

Case IPR2014-01209

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

PETITIONERS' REQUEST FOR ORAL ARGUMENT

Petitioners respectfully request oral argument. Pursuant to 37 C.F.R. § 42.70, Petitioners specify the following issues to be argued:

1. Patent Owner has failed to apply the broadest reasonable construction to claim terms, including the “map” and “access control” limitations;
2. Claims 1, 2, 4, 10, 11 and 13 are rendered obvious by Kikuchi and Bergsten;
3. Claim 5 is rendered obvious by Kikuchi, Bergsten and Smith;
4. Claims 1, 2, 4, 10, 11 and 13 are rendered obvious by Bergsten and Hirai;
5. Claim 5 is rendered obvious by Bergsten, Hirai and Smith;
6. Patent Owner has not antedated Kikuchi;
7. Patent Owner has not provided objective evidence of nonobviousness;
and
8. Other issues raised in papers filed in the present proceeding, including issues raised in any papers filed between today and the oral hearing.

Because issues across IPR2014-01197, IPR2014-01207, and IPR2014-01209 are similar, Petitioners suggest a single consolidated oral argument for these proceedings, with Petitioners and Patent Owner each allocated one hour to present oral arguments. Petitioners further suggest that the Board set the hearing for the afternoon of October 30, 2015. Doing so would allow the Board to hold the hearings in related case numbers IPR2014-01226, IPR2014-01463 and IPR2014-01544 during the morning of October 30, 2015 as requested by the petitioners in

those proceedings. See, e.g., Paper No. 37 in IPR2014-1226. During the morning hearing the Board can focus on the CRD references, as those are the only references at issue in those cases. During the afternoon hearing the Board will additionally hear arguments on Kikuchi, Bergsten and Hirai.

In the event any fees are required for this Request, please charge Deposit Account No. 15-0030.

Dated: September 21, 2015

/Greg H. Gardella/
Greg H. Gardella
Reg. No. 46,045

