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

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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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