

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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CISCO SYSTEMS, INC., QUANTUM CORP.  
and ORACLE CORP.,  
Petitioners,

v.

CROSSROADS SYSTEMS, INC.,  
Patent Owner

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Case IPR2014-01463<sup>1</sup>  
Patent 7,934,041

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**CONSOLIDATED PETITIONERS' REQUEST FOR ORAL HEARING**

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<sup>1</sup> Case IPR2015-00854 has been joined with this proceeding

In accordance with 37 C.F.R. § 42.70(a), Petitioners Cisco Systems, Inc., Quantum Corp., and Oracle Corp. hereby request an oral hearing in the present *inter partes* review. The issues to be argued include:

1. Patent Owner has failed to apply the broadest reasonable constructions of the “map” and “access control” limitations;
2. The combination of the CRD-5500 Manual and the HP Journal renders obvious the “map” limitation under any construction;
3. The combination of the CRD-5500 Manual and the HP Journal renders obvious the “access control” limitation under any construction;
4. The CRD-5500 Manual discloses the “allow access” limitation;
5. Patent Owner has not shown objective evidence of nonobviousness; and
6. Other issues raised in papers filed in the present proceeding, including issues raised in any papers filed between today and the oral hearing.

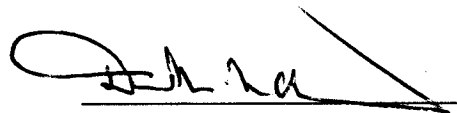
In light of these remarks, Petitioners respectfully request the opportunity to present oral arguments before the Board on October 30, 2015. *See* Revised Scheduling Order, Paper 14 at 2. Because the issues across IPR2014-01226, IPR2014-01463, and IPR2014-01544 are nearly identical, Petitioners suggest a single consolidated oral argument for these proceedings, with each side allocated a

total of one hour to present oral arguments. Petitioners respectfully request the scheduling of a morning session, if available.

If the Board has any questions or comments, the undersigned attorney respectfully requests a telephone conference. No fees are believed to be required for filing this request; however, the Commissioner is authorized to charge any required fees, or credit any overpayment, to Haynes and Boone, LLP's Deposit Account No. 08-1394.

Dated: September 17, 2015

Respectfully submitted,



David L. McCombs  
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Haynes and Boone, LLP  
Counsel for Petitioners Cisco  
Systems, Inc. and Quantum Corp.

**CERTIFICATE OF SERVICE**

The undersigned certifies, in accordance with 37 C.F.R. § 42.6(e), that service was made on Patent Owner and Oracle Corp. as detailed below.

*Date of service* September 17, 2015

*Manner of service* Electronic Mail

*Documents served* Consolidated Petitioners' Request for Oral Hearing

*Persons served* Steven R. Sprinkle  
Russell Wong  
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