

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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CISCO SYSTEMS, INC. AND QUANTUM CORPORATION,  
Petitioners,

v.

CROSSROADS SYSTEMS, INC.  
Patent Owner

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Case IPR2014-01544  
Patent No. 7,051,147

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**PATENT OWNER'S PRELIMINARY RESPONSE**

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## I. INTRODUCTION

United States Patent No. 7,051,147 (the “’147 Patent”, Ex. CQ-1001) is currently subject to the following related litigation that are joined for purposes of claim construction and discovery: *Crossroads Systems, Inc. v. Oracle Corp.*, 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 Corp.*, Case No. 1:14-CV-00150-SS (W.D. Tex.). Defendants Oracle Corporation, NetApp, Inc. and Huawei Technologies Co., Ltd (collectively “First Petitioners”) filed two petitions for *inter partes* review of the ’147 Patent on July 25, 2014 (collectively, the “First Two Petitions”). *Oracle Corp. v. Crossroads Systems Inc.*, IPR2014-01207, Paper 1 (PTAB July 25, 2014) (claims 14-39) (“First Petition”); *Oracle Corp. v. Crossroads Systems Inc.*, IPR2014-01209, Paper 1 (PTAB July 25, 2014) (claims 1-13) (“Second Petition”). On September 25, 2014, Cisco Systems, Inc. and Quantum Corporation (collectively “Second Petitioners” or “Petitioners”) filed a subsequent petition for *inter partes* review of the ’147 Patent (the “Third Petition” or “Petition”) in the instant proceeding. Patent Owner Crossroads Systems, Inc.

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