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 7,051,147

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**PETITIONERS' UNOPPOSED MOTION FOR *PRO HAC VICE*
ADMISSION PURSUANT TO 37 C.F.R. § 42.10(C)**

Petitioners Cisco Systems, Inc. and Quantum Corporation respectfully move that the Board recognize Mr. Clement S. Roberts as counsel *pro hac vice* during this proceeding. Patent Owner does not oppose this motion, and Mr. Roberts has already been admitted *pro hac vice* in a related proceeding, IPR2014-01226.

1. Time for Filing

This Motion for *Pro Hac Vice* Admission is being filed no sooner than twenty one (21) days after service of the petition.

2. Statement of Facts Showing Good Cause for Counsel *Pro Hac Vice*

Petitioners have been authorized to file motions seeking admission *pro hac vice* under 37 C.F.R. 42.10(c). (Paper No. 4 at 2.). Petitioners' lead and back-up counsel are registered practitioners:

Lead Counsel: David L. McCombs, USPTO Reg. No. 32,271;

Backup Counsel: Andrew S. Ehmke, USPTO Reg. No. 50,271

       Scott T. Jarratt, USPTO Reg. No. 70,297.

The following statement of facts shows that there is good cause for the Board to recognize Mr. Roberts *pro hac vice* on behalf of the Petitioners.

In summary, Mr. Roberts is an experienced litigator, has established familiarity with the subject matter at issue in this proceeding from his participation in co-pending litigation involving the subject patent, and if admitted, will be

involved in the depositions that occur in this proceeding. Specifically, U.S. Patent No. 7,051,147 is currently asserted against Petitioner Quantum Corporation in a co-pending litigation, *Crossroads Systems, Inc. v. Quantum Corporation, 1:14-cv-00150-SS* (W.D. Tex.) ("the co-pending litigation"). Mr. Roberts is a member of the California bar in good standing, and is representing Quantum Corporation in the co-pending litigation.

Mr. Roberts has analyzed prior art references and claim charts in connection with invalidity contentions and has been involved in forming claim construction positions related to the claimed inventions, all of which are relevant to the petition requesting *inter partes* review of U.S. Patent No. 7,051,147. Petitioners wish to apply Mr. Roberts' knowledge of the patent by employing him as counsel in this proceeding. Admission of Mr. Roberts *pro hac vice* will enable the Petitioners to avoid unnecessary expense and duplication of work between this proceeding and the co-pending litigation.

Petitioners' lead and backup counsel are registered practitioners and Mr. Roberts is an experienced litigation attorney having familiarity with the subject matter at issue in this proceeding. Therefore, Petitioners respectfully submit that there is good cause for the Board to recognize Mr. Roberts as counsel *pro hac vice* during this proceeding.

3. Affidavit of Individual Seeking to Appear

This Motion for *Pro Hac Vice* Admission is supported by an Affidavit of Mr. Roberts (CQ-1013).

Respectfully submitted,

Date: April 3, 2015

By: /Andrew S. Ehmke/
Andrew S. Ehmke
USPTO Reg. No. 50,271
Haynes and Boone, LLP
Counsel for Petitioner

PETITIONERS' EXHIBIT LIST

April 3, 2015

CQ-1001	U.S. Patent No. 7,051,147
CQ-1002	Prosecution History of U.S. Patent No. 7,051,147
CQ-1003	Declaration of Andrew Hospodor Under 37 C.F.R. § 1.68
CQ-1004	CMD Technology, Inc., *CRD-5500 SCSI Raid Controller User's Manual*, Revision 1.3, November 21, 1996
CQ-1005	*CMD Technology CRD-5500 RAID*, http://web.archive.org/web/19961226091552/http://www.cmd.com/brochure/crd5500.htm, archived December 26, 1996 by archive.org
CQ-1006	Hewlett-Packard Journal, Volume 47, Number 5, October 1996
CQ-1007	Sun Microsystems Computer Company, *SPARCstorage Array Configuration Guide*, Revision A, March 1995 ("SPARCstorage Guide")
CQ-1008	*SPARCstorage Array – Product Brief*, http://web.archive.org/web/19961220045017/http://www.sun.com/products-n-solutions/hw/peripherals/array.html, archived December 20, 1996 by archive.org ("SPARCstorage Product Brief")
CQ-1009	ORDER of November 8, 2011, *Crossroads Systems, Inc. v. 3PAR, Inc.*, *et. al.*, case no. 1-10-cv-00652 (W.D. Tex. 2010)
CQ-1010	American National Standard of Accredited Standards Committee X3, *Small Computer System Interface – 2 (X3T9.2)*, Rev. 10L, September 7, 1993
CQ-1011	American National Standard for Information Systems, *Fibre Channel Physical and Signaling Interface (FC-PH) X3.230*, Rev. 4.3, June 1, 1994
CQ-1012	*HP Journal Online - Home*, available at http://www.hpl.hp.com/hpjournal/journal.html, accessed July 31, 2014
CQ-1013	Affidavit of Clement S. Roberts In Support of Petitioners' Unopposed Motion for *Pro Hac Vice* Admission

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