

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  
\_\_\_\_\_

**PETITION FOR *INTER PARTES* REVIEW**

**OF**

**U.S. PATENT NO. 7,051,147**

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**I. Mandatory Notices**

**A. Real Party-in-Interest**

The real parties-in-interest are Cisco Systems, Inc. and Quantum Corporation (“Petitioners”).

**B. Related Matters**

Petitions for Inter Partes Review, IPR2014-01207, filed July 25, 2014, and IPR2014-01209, filed July 25, 2014; *Crossroads Systems, Inc. v. Quantum Corporation*, 1-14-cv-00150, TXWD, filed February 18, 2014; *Crossroads Systems, Inc. v. NetApp, Inc.*, 1-14-cv-00149, TXWD, filed February 18, 2014; *Crossroads Systems, Inc. v. Cisco Systems, Inc.*, 1-14-cv-00148, TXWD, filed February 18, 2014; *Crossroads Systems, Inc. v. Huawei Technologies Co. Ltd. et al.*, 1-13-cv-01025, TXWD, filed November 26, 2013; *Crossroads Systems, Inc. v. Oracle Corporation*, 1-13-cv-00895, TXWD, filed October 7, 2013. Also, (i) case nos. IPR2014-01197 (filed July 23, 2014) and IPR2014-01226 (filed July 31, 2014) have been filed against U.S. Patent No. 6,425,035, which is related to the ’147 patent; and (ii) case nos. IPR2014-01177 (filed July 18, 2014) and IPR2014-01463 (filed Sept. 8, 2014) have been filed against U.S. Patent No. 7,934,041, which is related to the ’147 patent. Additionally, this petition refers to a claim construction order from *Crossroads Systems, Inc. v. 3PAR, Inc., et al.*, no. 1-10-cv-00652 (W.D. Tex. 2010), which is one of the district court litigations involving U.S. Patent No. 6,425,035, which is related to the ’147 patent.

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### II. Grounds for Standing

Petitioners certify that they are not estopped or barred from requesting *inter partes* review of the '147 Patent. Petitioners were each served with a complaint asserting infringement of the '147 Patent on February 18, 2014, which is not more than one year before the filing of this Petition. Neither petitioner has initiated a civil action challenging the validity of any claim of the '147 Patent. Petitioners also certify that the '147 Patent is eligible for *inter partes* review.

### III. Relief Requested

Petitioners ask that the Patent Trial and Appeal Board (“the Board”) review the accompanying prior art and analysis, institute a trial for *inter partes* review of claims 1-39 (all claims) of the '147 Patent, and cancel those claims as invalid.

#### **IV. The Reasons for the Requested Relief**

The full statement of the reasons for the relief requested is as follows:

##### **A. Summary of Reasons**

In short, the claims of the '147 Patent simply recite obvious combinations of network storage components with functionality that was well-known at the time of the '147 Patent invention. For example, each of the '147 Patent's seven independent claims generally include limitations directed to (i) mapping workstations on one side of a storage router to specific storage devices on the other side of the storage router, and (ii) routing block-level data between the workstations and the storage devices based on the mapping so that the workstations may only access the particular storage devices to which they are mapped. The '147 Patent's claims require the workstations and storage devices to be connected via Fibre Channel links. In one embodiment of the '147 Patent, the block-level data flowing between the workstations and storage devices conforms to the SCSI protocol. CQ-1001, 5:46-56; 6:31-56.

These elements were well known in the prior art. For example, in 1996, CMD Technologies sold a storage router, the CRD-5500 SCSI RAID Controller, that performed the functions recited in the claims. According to the CRD-5500 user's manual, the CRD-5500 Controller (i) allows users to map hosts on one side of the controller to specific storage devices on the other side of the controller and then (ii) routes SCSI commands from hosts to storage devices based on the map,

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