

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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**PETITION FOR *INTER PARTES* REVIEW**

**OF**

**U.S. PATENT NO. 7,934,041**

<p><b>CROSSROADS EXHIBIT 2147</b> <b>NetApp Inc. v. Crossroads Systems, Inc.</b> <b>IPR2015-0077</b></p>
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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**

*Petition for Inter Partes Review*, IPR2014-01177, filed July 18, 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 '041 patent; and (ii) case nos. IPR2014-01207 (filed July 25, 2014) and IPR2014-01209 (filed July 25, 2014) have been filed against U.S. Patent No. 7,051,147, which is related to the '041 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 '041 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 '041 Patent. Petitioners were each served with a complaint asserting infringement of the '041 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 '041 Patent. Petitioners also certify that the '041 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 1-53 (all claims) of the '041 Patent, and cancel those claims as invalid.

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