UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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ORACLE CORPORATION
Petitioner,

v.

CROSSROADS SYSTEMS, INC.,
Patent Owner

_____

**PETITION FOR _INTER PARTES_ REVIEW
OF
U.S. PATENT NO. 7,051,147**

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I. This Petition Presents the Same Grounds Which Are Presented in IPR2014-01544

The instant *inter partes* review petition presents challenges which are identical to those presented in IPR2014-01544. The petition in the instant case copies verbatim the challenges set forth in the petition in IPR2014-01544 (Paper No. 3) and relies upon the same evidence, including the same expert declaration. This petition is accompanied by a motion for joinder.

II. Mandatory Notices

A. Real Party-in-Interest

The real party-in-interest is Oracle Corporation.

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,* 1-1 4-cv-00 150, TXWD, filed February 18, 2014; *Crossroads Systems, Inc. v. NetApp, Inc.,* 1-1 4-cv-00 149, TXWD, filed February 18, 2014; *Crossroads Systems, Inc. v. Cisco Systems, Inc.,* 1 -14-cv-00 148, TXWD, filed February 18, 2014; *Crossroads Systems, Inc. v. Huawei Technologies Co. Ltd. et al,* 1-13-cv-0 1025, TXWD, filed November 26, 2013; *Crossroads Systems, Inc. v. Oracle Corporation,* 1-13-cv-00895, TXWD, filed October 7, 2013. Also, (i) case nos. IPR2014-01 197 (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. IPR2014-01 177 (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.

C.   Lead and Back-up Counsel and Service Information

Pursuant to 37 C.F.R. § 42.8(b)(3)-(4), Petitioner provides the following

designation of counsel:

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III.   Grounds for Standing

Petitioner certifies that is not estopped or barred from requesting *inter partes*

review of the '147 Patent because this petition is accompanied by a motion for joinder.

The one-year time bar of 35 U.S.C. § 315(b) does not apply to a request for joinder.

35 U.S.C. § 315(b) (final sentence) ("[t]he time limitation set forth in the preceding

sentence shall not apply to a request for joinder under subsection (c)"); 37 C.F.R. §

42.122(b).

IV. Relief Requested

Petitioner asks 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.

V. 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

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