

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC. AND QUANTUM CORPORATION,
Petitioners,

v.

CROSSROADS SYSTEMS, INC.,
Patent Owner

PETITION FOR *INTER PARTES* REVIEW

OF

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

CROSSROADS EXHIBIT 2147
Oracle Corp. v. Crossroads Systems, Inc.
IPR2015-008

TABLE OF CONTENTS

I.	Mandatory Notices.....	1
A.	Real Party-in-Interest.....	1
B.	Related Matters.....	1
C.	Lead and Back-up Counsel and Service Information	2
II.	Grounds for Standing.....	2
III.	Relief Requested.....	2
IV.	The Reasons for the Requested Relief.....	3
A.	Summary of Reasons.....	3
B.	The '041 Patent.....	4
1.	Overview	4
2.	Prosecution History.....	8
C.	Identification of Challenges	9
1.	Challenged Claims	9
2.	Statutory Grounds for Challenges.....	9
3.	Claim Construction	10
i.	“native low level block protocol”	11
ii.	“remote”	12
4.	Identification of How the Claims Are Unpatentable	13
i.	Challenge #1: Claims 1-14, 16-33, 35-50 and 53 are obvious over the CRD Manual in view of the HP Journal.....	13

ii.	Challenge #2: Claims 15, 34, 51, 52 are obvious over the CRD Manual in view of the HP Journal and in further view of the Fibre Channel Standard	56
V.	Conclusion	60

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.

C. Lead and Back-up Counsel and Service Information

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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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