UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Juniper Networks, Inc., Ruckus Wireless, Inc., Brocade Communication Systems, Inc. and Netgear, Inc.,

Petitioners

v.

ChriMar Systems, Inc.,

Patent Owner

Case No. IPR2016-01389

U.S. Patent No. 8,155,012

Second Declaration of Ian Crayford

Mail Stop Patent Board Patent Trial and Appeal Board U.S. Patent and Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450



TABLE OF CONTENTS

		<u>Page</u>			
I.	INT	RODUCTION			
	A.	Materials Considered			
	B.	Opinions			
II.	CHF	HRIMAR RELIES ON INCORRECT PRIORITY DATE 3			
III.	ADI	DITIONAL CIRCUITRY IS NOT REQUIRED FOR OBVIOUSNESS4			
	A.	BST and CMC Overview			
	B.	BSTs and CMCs Are Not Required By The Claims Or Prior Art 5			
	C.	POSITA Would Have Know How To Implement Grounds 1 and 2.8			
IV.	TEA	CHALLENGED CLAIMS ARE OBVIOUS IN VIEW OF PRIOR ART TEACHING PHANTOM POWER DELIVERY OVER ETHERNET DATA LINES			
	A.	Ethernet Phantom Power Is Prior Art To The '012 Patent 11			
	B.	Chrimar Did Not Invent Or Enable Ethernet Phantom Power 13			
	C.	The IEEE's Standardization Of Ethernet Phantom Power Supports Obviousness			
	D.	There Is No Evidence That Ethernet Signals Would Be Compromised In The Combined Systems			
V.		TERNATIVE POWER DELIVERY METHODS IN THE PRIOR ART NOT NEGATE OBVIOUSNESS			
	A.	A Combination Does Not Become Less Obvious Because It Relies On A Reference Teaching Alternative Embodiments			
	В.	The Prior Art Favored Phantom Power			



				Page		
C. Unused Pairs Often Were Not Readily Available						
VI.	GROUND 1: HUNTER AND BULAN TEACH ALL LIMITATIONS OF THE CHALLENGED CLAIMS					
	A.	Hunter Teaches "An Adapted Piece Of Ethernet Data Terminal Equipment"				
		a.	Hunter Teaches "Ethernet"	. 29		
		b.	Hunter Teaches "Data Terminal Equipment"	. 30		
		c.	Hunter Teaches Phantom Powering Ethernet Termina Devices			
		d.	Hunter Figures 1 and 2 Teach Non-Limiting Embodiments	. 37		
		e.	Hunter Teaches Sending Power And 10Base-T Data The Same Conductors			
	B.	Bulan's Protective Device Improves Upon The Teachings Of Hunter				
	C.	The Hunter-Bulan Combination Teaches "Distinguishing Information' Conveyed by Different DC Currents, Including Information that Differentiates One Terminal Equipment From Another				
	D.	The Hunter-Bulan Combination Teaches a "Detection Protocol" 43				
	E.	E. The Hunter-Bulan Combination Teaches the Claimed "Path" That Includes a "Resistor" and "Impedance" Within It That Is "a Function of Voltage Across the Selected Contacts"				
VII.	CON	CLUSION		. 48		



MATERIALS CONSIDERED

Number	Short Name	Description
1001	'012 Patent	U.S. Patent 8,155,012 to Austermann, III et al.
1002	Crayford	Declaration of Ian Crayford in Support of Petition
1003	Hunter	WO 96/23377 to Hunter
1004	Bulan	U.S. Patent 5,089,927 to Bulan et al.
1005	Bloch	U.S. Patent 4,173,714 to Bloch et al.
1006	IEEE-1993	IEEE International Standard ISO/IEC 8802-3: 1993
1007 ¹	IEEE-1995 (part 1)	IEEE Standard 802.3u-1995
1008	IEEE-1995 (part 2)	IEEE Standard 802.3u-1995
1009	Huizinga	U.S. Patent 4,046,972 to Huizinga et al.
1010	Blacharski	Dan Blacharski, "Maximum Bandwith: A Serious Guide to High-Speed Networking", Que Corporation (1997)

¹ IEEE Standard 802.3u-1995 has been separated into Exhibits 1007 and 1008 to comply with file size limitations for Exhibits. Exhibits 1007 and 1008 are continuously paginated, from 1-200, and 201-415, respectively.



Number	Short Name	Description
1011	Katz	Randy H. Katz, "High Performance Network and Channel-Based Storage", Report UCB/CSD 91/650, September 1991
1012	Related Matters	List of Pending Cases Involving U.S. Patent 8,155,012
1013	Crayford C.V.	Resume of Ian Crayford
1014	IEEE Press Release	IEEE Standards Association News & Events: Press Releases "IEEE 802.3 Standard for Ethernet Marks 30 Years of Innovation and Global Market Growth"
1015	Complaint	Chrimar Systems, Inc. et al. v. Juniper Networks, Inc., Case No. 6:15-cv-00630 (N.D. Cal.), Dkt. No. 1.
1016	'058 patent	U.S. Patent 6,247,058 to Miller et al.
1017	'152 patent	U.S. Patent 6,865,152 to Luhmann
1018	N/A	Gordnia Declaration in support of <i>pro hac</i> vice motion
1019	N/A	Kagan Declaration in support of <i>pro hac</i> vice motion
1020	Madisetti Declaration	Deposition transcript for the July 21 and July 22, 2017 deposition of Dr. Vijay Madisetti
1021	Level One	Level One LXT914 Data Sheet, June 1997, Revision 2.2
1022	Pulse	Pulse LAN Isolation Transformer Catalog, May 1998
1023	Valor	Valor Electronic Products Catalog, 1992 (excerpts)



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

