

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 IPR2016-01389¹
U.S. Patent No. 8,155,012 B2

**PATENT OWNER'S REPLY IN SUPPORT OF ITS
MOTION TO EXCLUDE EVIDENCE**

¹ Ruckus Wireless, Inc., Brocade Communication Systems, Inc. and Netgear, Inc. (“Ruckus et al.”) filed a petition in (now terminated) IPR2017-00790, and Ruckus et al. has been joined to the instant proceeding.

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Cases

Hendricks v. Ford Motor Co.,
Case No. 4:12cv71, 2012 WL 7958760 (E.D. Tex. Oct. 15, 2012)3

Rules

Fed. R. Evid. 8031, 2

Office Patent Trial Practice Guide,
77 Fed. Reg. 157, 48767 (Aug. 14, 2012)4

List of Exhibits

Exhibit No.	Description	Date	Identifier
2017	Memorandum Opinion and order denying AMX's motion for summary judgment of non-infringement of the '012 Patent, Dkt. No. 96, <i>Chrimar Sys., Inc., et al. v. AMX, LLC</i> , Civil Action No. 6:13-cv-881-JDL, Eastern District of Texas	Oct. 22, 2014	
2018	Memorandum Opinion and order construing certain terms of the '012 Patent, Dkt. No. 105, <i>Chrimar Sys., Inc., et al. v. AMX, LLC</i> , Civil Action No. 6:13-cv-881-JDL, Eastern District of Texas	Jan. 8, 2015	
2019	Memorandum Opinion and order construing certain terms of the '012 Patent and denying AMX's motion for summary judgment of indefiniteness regarding the "distinguishing" terms of the '012 Patent, Dkt. No. 108, <i>Chrimar Sys., Inc., et al. v. AMX, LLC</i> , Civil Action No. 6:13-cv-881-JDL, Eastern District of Texas	Jan. 16, 2015	
2020	Memorandum Opinion and order denying AMX's motion for summary judgment of indefiniteness regarding certain claims of the '012, '107, and '760 Patents, Dkt. No. 122, <i>Chrimar Sys., Inc., et al. v. AMX, LLC</i> , Civil Action No. 6:15-cv-164-JDL, Eastern District of Texas	Mar. 28, 2016	

Exhibit No.	Description	Date	Identifier
2021	Memorandum Opinion and Order, Dkt. No. 123, filed in <i>Chrimar Systems, Inc., et al. v. Alcatel-Lucent, et al.</i> , Civil Action No. 6:15-cv-163-JDL, Eastern District of Texas	Mar. 28, 2016	
2030	Memorandum Opinion and Order, Dkt. No. 454, filed in <i>Chrimar Systems, Inc., et al. v. ADTRAN, Inc., et al.</i> , Civil Action No. 6:15-cv-618-JRG-JDL, Eastern District of Texas	June 20, 2016	
2032	Defendants' Combined Motion for Summary Judgment and Claim Construction (selected portions), Dkt. No. 73, filed in <i>Chrimar Systems, Inc., et al. v. AMX, LLC</i> , Civil Action No. 6:13-cv-881-JDL, Eastern District of Texas	July 28, 2014	
2033	Defendants' Responsive Claim Construction Brief (selected portions), Dkt. No. 432, filed in <i>Chrimar Sys., Inc., et al. v. ADTRAN, Inc., et al.</i> , Civil Action No. 6:15-cv-618-JRG-JDL, Eastern District of Texas	May 12, 2016	
2034	Memorandum Opinion and Order, Dkt. No. 223, filed in <i>Chrimar Sys., Inc., et al. v. Alcatel-Lucent, et al.</i> , Civil Action No. 6:15-cv-163-JDL, Eastern District of Texas	July 29, 2016	
2035	Memorandum Opinion and order on ALE's motion to construe certain claim terms of the '012 and '760 Patents, Dkt. No. 318, filed in <i>Chrimar Sys., Inc., et al. v. AMX, LLC</i> , Civil Action No. 6:15-cv-164-JDL, Eastern District of Texas	Sept. 27, 2016	

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