UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JUNIPER NETWORKS, INC.,	)U.S. Patent No.
	)8,942,107
Petitioner,	)Case IPR2016-01391
	)
vs.	)U.S. Patent No.
	)8,155,012
CHRIMAR SYSTEMS, INC.,	)Case IPR2016-01389
	)
Patent Owner.	)U.S. Patent No.
_____	)8,902,760
	)Case IPR2016-01399
RUCKUS WIRELESS, INC., BROCADE	)
COMMUNICATION SYSTEMS, INC., AND	)U.S. Patent No.
NETGEAR, INC.,	)8,942,107
	)Case IPR2017-00718
	)
Petitioner,	)U.S. Patent No.
	)8,155,012
vs.	)Case IPR2017-00790
	)
CHRIMAR SYSTEMS, INC.,	)U.S. Patent No.
	)8,902,760
Patent Owner.	)Case IPR2017-00719
_____	)

DEPOSITION OF IAN CRAYFORD

Los Angeles, California

Friday, July 21, 2017

VOLUME I

Reported by:
RENEE D. ZEPEZAUER, RPR, CRR
CSR No. 6275
JOB No. 2663279

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says it is a primary objective -- sorry. It is a primary object of the present invention to provide power subsystems for providing either phantom or third pair powered to equipment coupled to a local area network included, but not limited to, Ethernet, Token Ring, ATM, and isoEthernet.

BY MR. LEWRY:

Q I'm sorry. Where were you reading from?

A I apologize, Hunter 19 -- page 19, 2 through 8.

Q Okay. Great. And just so the record's clear, the terms "Ethernet, Token Ring," and "isoEthernet" all have circle R's next to their names; right?

A Hunter I believe is consistent in putting registered trademarks on a whole bunch of things, yes.

Q So I've had the court reporter mark a document, although I'm going to have her mark it with a different number. I'm going to have her mark it with 2050.

(Exhibit 2050 was marked for identification by the court reporter and is attached hereto.)

THE WITNESS: I have in front of me something that says it's -- I believe an 802.9f draft standard.

BY MR. LEWRY:

Q Yes.

MS. GORDNIA: I'm going to object to the relevance, foundation, scope, and the authenticity of

the document that has been marked as 2050.

BY MR. LEWRY:

Q Okay. Are you familiar with the 802.9f work of the IEEE?

A No, I'm not.

Q Were you aware that the IEEE in the context of 802.9 had put together a draft of standards for putting phantom power or third pair power over using the 802.9 standard?

MS. GORDNIA: Objection to form. Scope. And relevance and foundation.

THE WITNESS: The only reference I'm aware of regarding phantom power is in the 1032 citation, and it's very, very limited, and it basically says it's not con-- it's allowable, both phantom and third pair, but it's not part of the standard at that point.

I wasn't aware of when or if phantom powering had been further worked on in the standards. So I'm not aware of any additional work.

BY MR. LEWRY:

Q Okay. All right. That's fine. If you will turn with me to page 7, if you look at the bottom of the document, there's page numbers. There's a page number 7. So this is Exhibit 2050.

A Roman numerals?

MR. LEWRY: You need the question repeated?

THE REPORTER: Yes, please.

MR. LEWRY: Sure.

Q Sure. If the resistance of a particular piece of equipment is a fixed value, then power becomes just a function of the voltage; correct?

MS. GORDNIA: Objection to form. And foundation and relevance. Hypothetical.

THE WITNESS: Mathematically that would appear to be correct. In a hypothetical situation I don't know -- I don't understand under which conditions you're asking me. So if you can give me an example of some clarification.

BY MR. LEWRY:

Q That's all I need. Why don't we take a break.

Talin, if you could get those copies. I think we're getting very close to being done.

A Sure.

(Recess.)

(Exhibit 2054 was marked for identification by the court reporter and is attached hereto.)

BY MR. LEWRY:

Q Mr. Crayford, I think you have in front of you what we've marked as Exhibit 254, and the top of it, it says "EIA/TIA Bulletin." Do you see that at the very

top?

A I see that, yes.

MS. GORDNIA: So before we go further, Tom, I just want to object to this document on the grounds of authenticity, relevance, scope, foundation. This is the first time the document is making an appearance at these IPRs.

BY MR. LEWRY:

Q And then it says below that, it says, "Technical Systems Bulletin Additional Cable Specifications for Unshielded Twisted Pair Cables." Do you see that?

A Yes, I see that.

Q Have you seen this document before? I mean obviously not this physical copy, but this specification before?

A No, I have not.

Q There's a date on the front of it. It says November, 1991. Do you see that?

A I see the date, yes.

Q Okay. If you turn to the page that's labeled page 1 at the top, upper right-hand side. It's the page after -- it says, "Do not violate the law by making copies of this."

MS. GORDNIA: Thanks, Tom.