

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 Nos. IPR2016-01391, 2016-01399, and 2016-01397¹

U.S. Patent Nos. 8,942,107 B2, 8,902,760 B2, and 9,019,838 B2

**SUPPLEMENTAL DECLARATION OF DR. VIJAY K. MADISSETTI
IN SUPPORT OF PATENT OWNER'S RESPONSE UNDER
37 C.F.R. § 42.64(b)(2)**

¹ Ruckus Wireless, Inc., Brocade Communication Systems, Inc. and Netgear, Inc. filed a petition in (now terminated) IPR2017-00718, IPR2017-0719, and IPR2017-0720 who have been joined to the instant proceeding.

List of Exhibits

Exhibit No.	Description	Date	Identifier
2017	Memorandum Opinion and Order, Dkt. No. 96, filed in Chrimar Systems, Inc., et al. v. AMX, LLC, Civil Action No. 6:13-cv-881-JDL, Eastern District of Texas	October 12, 2016	
2018	Memorandum Opinion and Order, Dkt. No. 105, filed in Chrimar Systems, Inc., et al. v. AMX, LLC, Civil Action No. 6:13-cv-881-JDL, Eastern District of Texas	October 12, 2016	
2019	Memorandum Opinion and Order, Dkt. No. 108, filed in Chrimar Systems, Inc., et al. v. AMX, LLC, Civil Action No. 6:13-cv-881-JDL, Eastern District of Texas	October 12, 2016	
2020	Memorandum Opinion and Order, Dkt. No. 122, filed in Chrimar Systems, Inc., et al. v. Alcatel-Lucent, et al., Civil Action No. 6:15-cv-163-JDL, Eastern District of Texas	October 12, 2016	
2021	Memorandum Opinion and Order, Dkt. No. 123, filed in Chrimar Systems, Inc., et al. v. Alcatel-Lucent, et al., Civil Action No. 6:15-cv-163-JDL, Eastern District of Texas	October 12, 2016	

Exhibit No.	Description	Date	Identifier
2035	Memorandum Opinion and Order, Dkt. No. 318, filed in Chrimar Systems, Inc., et al. v. AMX, LLC, Civil Action No. 6:13-cv-881-JDL, Eastern District of Texas	October 12, 2016	
2036	Response to Office Action (Reexam Control No. 90/009,513) (June 15, 2010)	October 12, 2016	
2037	Notice of Intent to Issue Ex Parte Reexamination Certificate (Reexam Control No. 90/009,513) (Nov. 22, 2010)	October 12, 2016	
2038	Declaration of Dr. Vijay Madiseti		Madiseti Decl.
2039	Deposition transcript of Ian Crayford		¶Dep.
2040	Slides titled "DTE Power via MDI: System Requirements," presented on November 5, 1999 by Arlan Anderson of Nortel Networks	11/5/1999	Anderson 1999 slides
2041	IEEE Power via MDI Task Force Meeting Minutes from March 7-8, 2000	3/7-8/2000	
2042	IEEE Power via MDI Task Force Meeting Minutes from May 24-25, 2000	5/24-25/2000	
2043	Slides titled "DTE Power over MDI: Building Consensus," presented on May 24, 2000 by Ralph Andersson of TDK Semiconductor, Daniel Dove of Hewlett Packard, and Robert Muir of Level One Communications	5/24/2000	Dove slides

Exhibit No.	Description	Date	Identifier
2044	Slides titled "Powering and Discovery Alternatives," presented on May 24, 2000 by Arlan Anderson of Nortel Networks	5/24/2000	Anderson 2000 slides
2045	IEEE Power via MDI Task Force Meeting Minutes from July 11-12, 2000	7/11-12/2000	
2046	Slides titled "Technical Feasibility of Sending Common Mode Power on the Signal Pairs," presented on May 24, 2000 by Roger Karam and Karl Nakamura of Cisco Systems		Karam slides
2047	E. Krol & E. Hoffman, Internet Engineering Task Force Network Working Group, Request for Comments: 1462, "FYI on 'What is the Internet?'"	May 1993	Krol RFC
2048	Declaration of Clyde Camp		Camp Decl.
2049	U.S. Patent No. 5,995,392		
2050	Dr. Vijay Madiseti CV		
2051	<i>Not used</i>		
2052	U.S. Pat. No. 7,061,142 B1		the '142 patent
2053	Supplemental Declaration of Dr. Vijay Madiseti		
2054	Declaration of Steven Johnson		

I, Dr. Vijay Madiseti, declare as follows:

1. I am making this declaration at the request of Chrimar Systems, Inc. ("Chrimar" or "Patent Owner") in the matter of *Inter Partes* Review ("IPR") of U.S. Patent Nos. 8,942,107 ("the '107 Patent"), 8,155,012 ("the '012 Patent"), 8,902,760 ("the '760 Patent"), and 9,019,838 ("the '838 Patent").

2. I have previously submitted a declaration in the IPR.

3. I am being compensated for my work in this matter at a rate of \$450/hour. I am also reimbursed for my reasonable expenses incurred in connection with my work on this proceeding. My compensation in no way depends on the outcome of this proceeding.

4. I understand that the Petitioners have filed objections to my declaration pursuant to 37 C.F.R. § 42.64. Specifically, Petitioners have objected to paragraphs 45, 56, 93, 157, and 191 of my declaration.

5. Paragraph 45 states:

Both Grounds fail to take into consideration the pre-existing Ethernet environment, which is the environment for the claimed invention. (Pet., p. 3; Ex.1002, ¶45.) Petitioners' unstated assumption is that telephony devices could simply have been added into the Ethernet systems, but that is untrue. Using Petitioners' proposed telephone-based phantom-power combinations – unaltered, as proposed – in an existing Ethernet network would have burned out the existing Bob Smith terminations. The result would be impaired signal integrity and degraded propagation of Ethernet data. (See, e.g., Ex.2039 at 45:10-21.) That would be contrary to the stated motivation of not “using any bandwidth from [the Ethernet] channel.” (Pet. at 53.) Damaging Bob Smith terminations would most certainly have reduced the available bandwidth.

6. Paragraph 56 states:

At the time of the invention of the patents, and for several years afterward, experts in the field were skeptical that operating power could be delivered to terminal equipment using the Ethernet data pairs (contacts 1, 2, 3, and 6) without disrupting the data propagation.

7. Paragraph 93 states:

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