

Ian Crayford
7/21/2017

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

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|--|---------------------|
| 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 NETGEAR, INC., |)U.S. Patent No. |
| |)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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1 says it is a primary objective -- sorry. It is a
2 primary object of the present invention to provide power
3 subsystems for providing either phantom or third pair
4 powered to equipment coupled to a local area network
5 included, but not limited to, Ethernet, Token Ring, ATM,
6 and isoEthernet.

7 BY MR. LEWRY:

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

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

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

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

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

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

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

22 BY MR. LEWRY:

23 Q Yes.

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

1 the document that has been marked as 2050.

2 BY MR. LEWRY:

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

5 A No, I'm not.

6 Q Were you aware that the IEEE in the context of
7 802.9 had put together a draft of standards for putting
8 phantom power or third pair power over using the 802.9
9 standard?

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

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

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

20 BY MR. LEWRY:

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

25 A Roman numerals?

1 MR. LEWRY: You need the question repeated?

2 THE REPORTER: Yes, please.

3 MR. LEWRY: Sure.

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

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

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

14 BY MR. LEWRY:

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

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

18 A Sure.

19 (Recess.)

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

22 BY MR. LEWRY:

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

1 top?

2 **A I see that, yes.**

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

8 BY MR. LEWRY:

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

13 **A Yes, I see that.**

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

17 **A No, I have not.**

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

20 **A I see the date, yes.**

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

25 MS. GORDNIA: Thanks, Tom.