

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, 2106-01389, 2016-01399, and 2016-01397¹
U.S. Patent Nos. 8,942,107 B2, 8,155,012 B2, 8,902,760 B2, and 9,019,838 B2

DECLARATION OF CLYDE CAMP

¹ Ruckus Wireless, Inc., Brocade Communication Systems, Inc. and Netgear, Inc. filed a petition in (now terminated) IPR2017-00718, IPR2017-0790, IPR2017-0719, and IPR-2017-720 who have been joined to the instant proceeding.

I, Clyde Camp, declare:

1. I was retained by Brooks Kushman to affirm the following based on historical records maintained by the IEEE-SA 802 LAN/MAN committee's document server. I make this declaration on personal knowledge and am competent to testify.

2. I was a member of the IEEE Standards Association Standards Board from 1991-2002 with the exception of 1999-2000, when I was under contract to the Association. The Standards Board is the governing body of all IEEE standards and the entity that ultimately initiates the work process to write standards (including the revision to the 802.3 standard known as 802.3af) and that approves the final standard itself. I was also chair of the IEEE Standards Association Patent Committee during 2001 and part of 2002 while 802.3af was being developed.

3. While I was not a member of 802.3af, I was personally aware that this work was being done and I am familiar with the record-keeping system and policies used by IEEE 802 LAN/MAN Standards Committee including 802.3af.

4. The 802.3af Committee maintained a record of its proceedings by posting documents pertaining to its work, including meeting minutes and presentations, on its public document server at <http://www.ieee802.org/3/af/public/> ("the Website"). Documents on the Website were made by both contributors and visitors in the 802.af Committee and the documents were kept in the course of its

regularly conducted business activities. The documents on the Website were posted and available to the public on or near the date stated in the documents. The Website is still accessible from the IEEE 802 LAN/MAN Standards Committee's main website, <http://www.ieee802.org/>.

5. One of the documents maintained on the Website is a copy of slides titled DTE Power via MDI: System Requirements, presented on November 5, 1999 by Arlan Anderson of Nortel Networks. A copy of that document is attached as Exhibit 2040. The web address for that document is http://www.ieee802.org/3/power_study/public/nov99/anderson_1_1199.pdf.

6. Another of the documents maintained on the Website is a copy of the IEEE Power via MDI Task Force Meeting Minutes from March 7-8, 2000. A copy of that document is attached as Exhibit 2041. The web address for that document is http://www.ieee802.org/3/af/public/mar00/minutes_0300.pdf.

7. Another of the documents maintained on the Website is a copy of the IEEE Power via MDI Task Force Meeting Minutes from May 24-25, 2000. A copy of that document is attached as Exhibit 2042. The web address for that document is http://www.ieee802.org/3/af/public/may00/minutes_0500.pdf.

8. Another of the documents maintained on the Website is a copy of 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

Case Nos. IPR2016-01391, 2106-01389, 2016-01399, and 2016-01397

Robert Muir of Level One Communications. A copy of that document is attached as Exhibit 2043. The web address for that document is http://www.ieee802.org/3/af/public/may00/andersson_1_0500.pdf.

9. Another of the documents maintained on the Website is a copy of slides titled Powering and Discovery Alternatives, presented on May 24, 2000 by Arlan Anderson of Nortel Networks. A copy of that document is attached as Exhibit 2044. The web address for that document is http://www.ieee802.org/3/af/public/may00/anderson_1_0500.pdf.

10. Another of the documents maintained on the Website is a copy of the IEEE Power via MDI Task Force Meeting Minutes from July 11-12, 2000. A copy of that document is attached as Exhibit 2045. The web address for that document is http://www.ieee802.org/3/af/public/jul00/minutes_0700.pdf.

11. Another of the documents maintained on the Website is a copy of 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. A copy of that document is attached as Exhibit 2046. The web address for that document is http://www.ieee802.org/3/af/public/jul00/karam_1_0700.pdf.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my ability.

Executed on: March 29, 2017

/Clyde Camp/