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 IPR2016-01397¹ U.S. Patent No. 9,019,838 B2

PATENT OWNER'S RESPONSE TO PETITIONS FOR *INTER PARTES* REVIEW UNDER 37 C.F.R. § 42.220

¹ Ruckus Wireless, Inc., Brocade Communication Systems, Inc. and Netgear, Inc. ("Ruckus et al.") filed a petition in (now terminated) IPR2017-00720, and Ruckus et al. has been joined to the instant proceeding.



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| | A. | For both combinations: at the time of the invention, an ordinary artisan would not have had a reason to apply telephone-based phantom operating power to Ethernet terminal equipment | .13 | | | | |
| | | terminal equipment would have destroyed Bob Shifting terminations, saturated the common mode chokes, and thus degraded the propagation of Ethernet data | .13 | | | | |
| | B. | Additionally for Bloch-Huizinga-IEEE: An ordinary artisan would not have applied Bloch's telephone-based phantom power to Ethernet terminal equipment for the additional reason | | | | | |
| | | | | | | | |



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that Bloch would have disrupted and degraded the Ethernet data signal 26 Additionally for Hunter-Bulan: An ordinary artisan would not C. have replaced Hunter's "preferable" protective device with the unnecessarily complicated currently limiting circuit of Bulan.28 The Proposed Hunter-Bulan Combination Does Not Disclose the VII. All challenged claims: The Hunter-Bulan combination does not A. teach the claimed "Ethernet connection . . . contacts" that both (1) are "used to carry BaseT Ethernet communication signals," and (2) via which "different magnitudes of DC current flow"32 Petitioners have failed to show that Hunter's discussion of "Ethernet®" discloses the claimed "contacts used to carry BaseT Ethernet communication signals"......34 Petitioners have not proven their assertion that Hunter 2. teaches hub 170 providing phantom power to Ethernet terminal devices; on the contrary, Hunter's phantompower circuit connects a hub to other hubs – not to Hunter's specification confirms that Figure 2 does not 3. В. Claim 2: The Hunter-Bulan combination does not teach a Claims 26 and 29: The Hunter-Bulan combination does not C. teach a central piece of Ethernet network equipment configured to "distinguish" one "end device"/"network object" from



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List of Exhibits

| Exhibit | | | |
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| No. | Description | Date | Identifier |
| 2017 | Memorandum Opinion and Order, | 10/22/2014 | |
| | 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 | | |
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| | Dkt. No. 105, filed in Chrimar | | |
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| | Systems, Inc., et al. v. Alcatel-Lucent, | | |
| | et al., Civil Action No. 6:15-cv-163- | | |
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