

Ian Crayford  
7/21/2017

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	)U.S. Patent No.
COMMUNICATION SYSTEMS, INC., AND	)8,942,107
NETGEAR, INC.,	)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

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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.