

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 REQUEST FOR AUTHORIZATION TO FILE
SERVED SUPPLEMENTAL EVIDENCE IN RESPONSE
TO MOTION EXCLUDE**

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.

Patent Owner, Chrimar Systems, Inc. (“Chrimar”), submits this request seeking authorization to file its supplemental evidence in response to Petitioner’s Motion to Exclude Evidence.

The Board has addressed a similar issue in IPR2013-00116, Paper 29, page 3. “Patent Owner asked whether supplemental evidence provided in response to an evidentiary objected may be filed, as well as served. The Board instructed Patent Owner not to file such evidence. In the event Petitioner files a motion to exclude evidence, Patent Owner may seek authorization to file an opposition thereto and to file its supplemental evidence.”

On August 2, 2017, Petitioners filed a Motion to Exclude Evidence. In addition to filing an opposition to the Motion to Exclude Evidence, Patent Owner is seeking authorization to file exhibits listed below that were served on the Petitioner on April 25, 2017.

Ex. No.	Description	Date	Identifier
2052	U.S. Pat. No. 7,061,142 B1		the ‘142 patent
2053	Supplemental Declaration of Dr. Vijay Madisetti		
2054	Declaration of Steven Johnson		

For the foregoing reasons, Patent Owner respectfully requests that the Board authorize Patent Owner to file the supplemental exhibits.

Respectfully submitted,

Dated: August 11, 2017

/Frank A. Angileri/
Frank A. Angileri (Reg. No. 36,733)
Thomas A. Lewry (Reg. No. 30,770)
Marc Lorelli (Reg. No. 43,759)
Christopher C. Smith (Reg. No. 59,669)
Brooks Kushman P.C.
1000 Town Center, 22nd Floor
Southfield, MI 48075
(248) 358-4400

Richard W. Hoffmann (Reg. No. 33,711)
Reising Ethington PC
755 West Big Beaver Rd., Suite 1850
Troy, Michigan 48084
248.786.0163

Attorneys for Patent Owner

Certificate of Service

On August 11, 2017, a copy of this **PATENT OWNER'S REQUEST FOR AUTHORIZATION TO FILE SERVED SUPPLEMENTAL EVIDENCE IN RESPONSE TO MOTION EXCLUDE** has been served on Petitioner's counsel via electronic mail at the email addresses shown below:

Lead Counsel & Back-up Counsel for Juniper	
Nima Hefazi Reg. No. 63,658 nhefazi@irell.com Postal and Hand-Delivery Address: IRELL & MANELLA, LLP 840 Newport Center Drive, Suite 400 Newport Beach, CA 92660 Juniper-ChrimarIPR@irell.com	Jonathan Kagan, <i>pro hac vice</i> pending jkagan@irell.com Postal and Hand-Delivery Address: IRELL & MANELLA, LLP 1800 Avenue of the Stars, Suite 900 Los Angeles, CA 90067 Juniper-ChrimarIPR@irell.com
Lead Counsel & Back up Counsel for Ruckus Wireless, Inc., Brocade Communication Systems, Inc., & Netgear, Inc.	
Joseph Powers (Reg. No. 47,006) Duane Morris LLP 30 South 17th Street Philadelphia PA 19103-4196 JAPowers@duanemorris.com	Christopher Tyson (Reg. No. 63,850) Duane Morris LLP 505 9th St. NW, Ste 1000 Washington DC 20004 CJTyson@duanemorris.com Matthew S. Yungwirth DUANE MORRIS LLP 1075 Peachtree Street, NE Suite 2000 Atlanta, Georgia 30309 msyungwirth@duanemorris.com

Respectfully submitted,

/Frank A. Angileri/

Frank A. Angileri (Reg. No. 36,733)

Thomas A. Lewry (Reg. No. 30,770)

Marc Lorelli (Reg. No. 43,759)

Christopher C. Smith (Reg. No. 59,669)

Case No.: IPR2016-01397
Patent No.: 9,019,838

Atty. Dkt. No.: CHRMC0111IPR1

Brooks Kushman P.C.
1000 Town Center, 22nd Floor
Southfield, MI 48075
(248) 358-4400

Richard W. Hoffmann (Reg. No. 33,711)
Reising Ethington PC
755 West Big Beaver Rd., Suite 1850
Troy, Michigan 48084
248.786.0163

Attorneys for Patent Owner