## 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 No. IPR2016-01399

U.S. Patent No. 8,902,760

Second Declaration of Ian Crayford

Mail Stop Patent Board Patent Trial and Appeal Board U.S. Patent and Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450



## **TABLE OF CONTENTS**

		<u>Page</u>			
I.	INTRODUCTION9				
	A.	Materials Considered9			
	B.	Opinions9			
II.	CHF	RIMAR RELIES ON INCORRECT PRIORITY DATE 10			
III.	ADI	DITIONAL CIRCUITRY IS NOT REQUIRED FOR OBVIOUSNESS11			
	A.	BST and CMC Overview			
	B.	BSTs and CMCs Are Not Required By The Claims Or Prior Art 12			
	C.	POSITA Would Have Know How To Implement Grounds 1 and 215			
IV.	TEA	CHALLENGED CLAIMS ARE OBVIOUS IN VIEW OF PRIOR ART TEACHING PHANTOM POWER DELIVERY OVER ETHERNET DATA LINES			
	A.	Ethernet Phantom Power Is Prior Art To The '760 Patent			
	B.	Chrimar Did Not Invent Or Enable Ethernet Phantom Power 20			
	C.	The IEEE's Standardization Of Ethernet Phantom Power Supports Obviousness			
	D.	There Is No Evidence That Ethernet Signals Would Be Compromised In The Combined Systems			
V.		TERNATIVE POWER DELIVERY METHODS IN THE PRIOR ART NOT NEGATE OBVIOUSNESS			
	A.	A Combination Does Not Become Less Obvious Because It Relies On A Reference Teaching Alternative Embodiments			



				Page
	B.	The Prior Art Favored Phantom Power		
	C.	Unused Pairs Often Were Not Readily Available		34
VI.	GROUND 1: HUNTER AND BULAN TEACH ALL LIMITATIONS OF THE CHALLENGED CLAIMS			
	A.	Hunter Teaches "BaseT Ethernet Terminal Equipment"		36
		a.	Hunter Teaches "Ethernet"	36
		b.	Hunter Teaches "Terminal Equipment"	37
		c.	Hunter Teaches Phantom Powering Ethernet Termin Devices	
		d.	Hunter Figures 1 and 2 Teach Non-Limiting Embodiments	43
		e.	Hunter Teaches Sending Power And 10Base-T Data The Same Conductors	
	B.		tective Device Improves Upon The Teachings Of Hu	
	C.	The Hunter-Bulan Combination Teaches Information About Termina Equipment Conveyed by Different DC Currents, and Central Equipment to Distinguish One Terminal Equipment From Another 47		
	D.	The Hunter-Bulan Combination Teaches a "Detection Protocol" 49		
	E.	The Hunter-Bulan Combination Teaches the Claimed "Path" 50		
	F.	The Hunter-Bulan Combination Teaches "Powered-Off" Terminal Equipment		
VII.	GROUND 2: BLOCH, HUIZINGA, AND IEEE TEACH ALL LIMITATIONS OF THE CHALLENGED CLAIMS			56
	A.	The Bloch-Huizinga-IEEE Combination Teaches "Powered-Off" Terminal Equipment		



		<u>Page</u>
VIII.	CONCLUSION	. 58



## **MATERIALS CONSIDERED**

<b>Number</b>	<b>Short Name</b>	<b>Description</b>
1001	'760 Patent	U.S. Patent 8,902,760 to Austermann, III et al.
1002	Crayford	Declaration of Ian Crayford in Support of Petition
1003	Hunter	WO 96/23377 to Hunter
1004	Bulan	U.S. Patent 5,089,927 to Bulan et al.
1005	Bloch	U.S. Patent 4,173,714 to Bloch et al.
1006	IEEE-1993	IEEE International Standard ISO/IEC 8802-3: 1993
1007 <sup>1</sup>	IEEE-1995 (part 1)	IEEE Standard 802.3u-1995
1008	IEEE-1995 (part 2)	IEEE Standard 802.3u-1995
1009	Huizinga	U.S. Patent 4,046,972 to Huizinga et al.
1010	Blacharski	Dan Blacharski, "Maximum Bandwith: A Serious Guide to High-Speed Networking", Que Corporation (1997)

<sup>&</sup>lt;sup>1</sup> IEEE Standard 802.3u-1995 has been separated into Exhibits 1007 and 1008 to comply with file size limitations for Exhibits. Exhibits 1007 and 1008 are continuously paginated, from 1-200, and 201-415, respectively.



# DOCKET

# Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

# **Real-Time Litigation Alerts**



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## **Advanced Docket Research**



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## **Analytics At Your Fingertips**



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

### API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

#### **LAW FIRMS**

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

#### **FINANCIAL INSTITUTIONS**

Litigation and bankruptcy checks for companies and debtors.

## **E-DISCOVERY AND LEGAL VENDORS**

Sync your system to PACER to automate legal marketing.

