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

Petitioners' Reply Brief

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

DOCKF

R

M

TABLE OF CONTENTS

<u>Page</u>

I.	INTRODUCTION 1		
II.	CHRIMAR RELIES ON INCORRECT PRIORITY DATE 2		
III.	ADDITIONAL CIRCUITRY IS NOT REQUIRED FOR OBVIOUSNESS		
	A.	BST and CMC Overview	
	B.	BSTs and CMCs Are Not Relevant	
	C.	POSITA Would Have Know How To Implement Grounds 1 and 2.4	
IV.	CLAIMS ARE OBVIOUS IN VIEW OF PRIOR ART TEACHING POWER DELIVERY OVER ETHERNET DATA LINES		
	А.	Ethernet Phantom Power Is Prior Art5	
	B.	Chrimar Did Not Invent Or Enable Ethernet Phantom Power	
	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.	ALTERNATIVE PRIOR ART POWER DELIVERY METHODS DO NOT NEGATE OBVIOUSNESS		
	A.	A Combination Does Not Become Less Obvious Because It Relies On A Reference Teaching Alternative Embodiments	
	B.	The Prior Art Favored Phantom Power9	
	C.	Unused Pairs Often Were Not Readily Available10	
VI.	GROUND 1: HUNTER AND BULAN TEACH THE CLAIMS 11		

Page

	A. Hunter Teaches "BaseT Ethernet Terminal Equipment " 1		
	B. Bulan's Protective Device Improves Upon The Teachings Of Hu		
	C.	The Hunter-Bulan Combination Teaches Information About Terminal Equipment Conveyed by Different DC Currents, and Central Equipment to Distinguish One Terminal Equipment From Another20	
	D.	The Hunter-Bulan Combination Teaches a "Detection Protocol" 21	
	E.	The Hunter-Bulan Combination Teaches the Claimed "Path"	
	F.	The Hunter-Bulan Combination Teaches "Powered-Off" Terminal Equipment	
VII.	GROUND 2: BLOCH, HUIZINGA, AND IEEE TEACH ALL LIMITATIONS OF THE CLAIMS INCLUDING "POWERED OFF" TERMINAL EQUIPMENT		
VIII.	CONCLUSION		

TABLE OF AUTHORITIES

Page

<u>Cases</u>

In re Fulton, 391 F.3d 1195, 1201 (Fed. Cir. 2004)	9
KSR Int'l Co. v. Teleflex Inc., 550 U.S. 398, 418, 420-421 (2007)	
Muniauction, Inc. v. Thomson Corp., 532 F.3d 1318, 1327 (Fed. Cir.	
2008)	. 7

IPR2016-01399, Petitioners' Reply U.S. Patent No. 8,902,760

DOCKE.

Δ

Δ

RM

LIST OF EXHIBITS

Number	<u>Short Name</u>	Description
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
1007¹	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)
1011	Katz	Randy H. Katz, "High Performance Network and Channel-Based Storage", Report UCB/CSD 91/650, September 1991
1012	Related Matters	List of Pending Cases Involving U.S. Patent 8,902,760

¹ 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.

Find authenticated court documents without watermarks at docketalarm.com.

DOCKET A L A R M



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.