

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 IPR2016-01399¹
U.S. Patent No. 8,902,760

**PATENT OWNER'S OPPOSITION TO PETITIONERS'
MOTION TO EXCLUDE**

¹ Ruckus Wireless, Inc., Brocade Communication Systems, Inc. and Netgear, Inc. filed a petition in (now terminated) IPR2017-00719, who have been joined to the instant proceeding.

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37 C.F.R. § 42.64 2, 4, 5, 9, 10

37 C.F.R. §42.1047

Fed. R. Evid. 90112

List of Exhibits

| Exhibit No. | Description | Date | Identifier |
|--------------------|---|-------------|-------------------|
| 2017 | Memorandum Opinion and Order, 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 | 10/22/2014 | |
| 2018 | Memorandum Opinion and Order, Dkt. No. 105, filed in Chrimar Systems, Inc., et al. v. AMX, LLC, Civil Action No. 6:13-cv-881-JDL, Eastern District of Texas | 1/8/2015 | |
| 2019 | Memorandum Opinion and Order, Dkt. No. 108, filed in Chrimar Systems, Inc., et al. v. AMX, LLC, Civil Action No. 6:13-cv-881-JDL, Eastern District of Texas | 1/16/2015 | |
| 2020 | Memorandum Opinion and Order, Dkt. No. 122, filed in Chrimar Systems, Inc., et al. v. Alcatel-Lucent, et al., Civil Action No. 6:15-cv-163-JDL, Eastern District of Texas | 3/28/2016 | |
| 2021 | Memorandum Opinion and Order, Dkt. No. 123, filed in Chrimar Systems, Inc., et al. v. Alcatel-Lucent, et al., Civil Action No. 6:15-cv-163-JDL, Eastern District of Texas | 3/28/2016 | |
| 2035 | Memorandum Opinion and Order, Dkt. No. 318, filed in Chrimar Systems, Inc., et al. v. AMX, LLC, Civil Action No. 6:13-cv-881-JDL, Eastern District of Texas | 9/27/2016 | |
| 2036 | Response to Office Action (Reexam Control No. 90/009,513) (June 15, 2010) | 6/15/2010 | |

| Exhibit No. | Description | Date | Identifier |
|--------------------|--|--------------|----------------------|
| 2037 | Notice of Intent to Issue Ex Parte Reexamination Certificate (Reexam Control No. 90/009,513) (Nov. 22, 2010) | 11/22/2010 | |
| 2038 | Declaration of Dr. Vijay Madiseti | | Madiseti Decl. |
| 2039 | Deposition transcript of Ian Crayford | | Crayford Dep. |
| 2040 | Slides titled "DTE Power via MDI: System Requirements," presented on November 5, 1999 by Arlan Anderson of Nortel Networks | 11/5/1999 | Anderson 1999 slides |
| 2041 | IEEE Power via MDI Task Force Meeting Minutes from March 7-8, 2000 | 3/7-8/2000 | |
| 2042 | IEEE Power via MDI Task Force Meeting Minutes from May 24-25, 2000 | 5/24-25/2000 | |
| 2043 | Slides titled "DTE Power over MDI: Building Consensus," presented on May 24, 2000 by Ralph Andersson of TDK Semiconductor, Daniel Dove of Hewlett Packard, and Robert Muir of Level One Communications | 5/24/2000 | Dove slides |
| 2044 | Slides titled "Powering and Discovery Alternatives," presented on May 24, 2000 by Arlan Anderson of Nortel Networks | 5/24/2000 | Anderson 2000 slides |
| 2045 | IEEE Power via MDI Task Force Meeting Minutes from July 11-12, 2000 | 7/11-12/2000 | |
| 2046 | Slides titled "Technical Feasibility of Sending Common Mode Power on the Signal Pairs," presented on May 24, 2000 by Roger Karam and Karl Nakamura of Cisco Systems | | Karam slides |

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