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June 1, 2017

VIA ECF

The Honorable Susan Illston
United States District Court,
Northern District of California
San Francisco Courthouse
Courtroom 1, 17th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Re: *Chrimar Systems, Inc. et al. v. Juniper Networks, Inc.*, N.D. Cal. Case No. 3:16-CV-00558 (SI); *Chrimar Systems, Inc. et al. v. Ruckus Wireless, Inc.*, N.D. Cal. Case No. 3:16-cv-00186 (SI), *Chrimar Systems, Inc. et al. v. NETGEAR, Inc.*, N.D. Cal. Case No. 3:16-cv-00624 (SI), and *Chrimar Systems, Inc. et al. v. Fortinet, Inc.*, N.D. Cal. Case No. 3:16-cv-00897 (SI)

Dear Judge Illston:

Pursuant to the Court's February 16, 2017 Order Continuing the Stay in the above referenced actions (Dkt. No. 82), the parties write to provide a quarterly joint status update to the Court regarding Juniper's four *inter partes* review ("IPR") petitions pending before the Patent Trial and Appeal Board's ("PTAB"), and the status of all other IPR and reexamination proceedings involving the four Patents-in-Suit.¹

1. Juniper IPRs

Since January 25, 2017, *inter partes* review has been instituted for all four of Juniper's Petitions and on all asserted claims of the Patents-in-Suit; these IPRs are currently pending. Since the parties' last status letter to the Court on February 6, 2017 (Dkt. No. 80), Defendants Ruckus Wireless, Inc. and NETGEAR, Inc. have been joined as petitioners to Juniper's four IPRs. In addition, the PTAB has scheduled oral argument for August 31, 2017 for the four IPRs. A copy of the current IPR schedule, which is identical for each of the four IPRs, appears as Attachment A to this letter.

¹ U.S. Patent No. 8,155,012 (the "'012 patent"), U.S. Patent No. 8,942,107 (the "'107 patent"), U.S. Patent No. 8,902,760 (the "'760 patent") and U.S. Patent No. 9,019,838 (the "'838 patent") (collectively, "Patents-in-Suit").

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The following chart summarizes the status of the instituted Juniper IPRs.

Patent	Petition, Date Filed	Status
8,155,012	IPR2016-01389, filed July 8, 2016	Instituted on January 25, 2017 as to all challenged claims and on both grounds presented. Oral argument is set for August 31, 2017. IPR2017-00790, filed January 27, 2017 by Ruckus Wireless, Inc., Brocade Communications Systems, Inc., and NETGEAR, Inc. was joined with IPR2016-01389 on March 15, 2017.
8,942,107	IPR2016-01391, filed July 8, 2016	Instituted on December 22, 2016 as to all challenged claims and on both grounds presented. Oral argument is set for August 31, 2017. IPR2017-00718 filed January 18, 2017 by Ruckus Wireless, Inc., Brocade Communications Systems, Inc., and NETGEAR, Inc. was joined with IPR2016-01391 on March 15, 2017.
8,902,760	IPR2016-01399, filed July 8, 2016	Instituted on January 4, 2017 as to all challenged claims and on both grounds presented. Oral argument is set for August 31, 2017. IPR2017-00719, filed January 18, 2017 by Ruckus Wireless, Inc., Brocade Communications Systems, Inc., and NETGEAR, Inc. was joined with IPR2016-01399 on March 16, 2017.
9,019,838	IPR2016-01397, filed July 8, 2016	Instituted on January 4, 2017 as to all challenged claims and on both grounds presented. Oral argument is set for August 31, 2017. IPR2017-00720, filed January 18, 2017 by Ruckus Wireless, Inc., Brocade Communications Systems, Inc., and NETGEAR, Inc. was joined with IPR2016-01397 on March 16, 2017.

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2. Unrelated IPRs

In addition to the Juniper IPRs, several defendants in lawsuits brought by Chrimar in Texas also filed IPRs for the Patents-in-Suit. The status of these third-party IPRs, which are unrelated to the Juniper IPRs, is detailed below.

Patent	Petition, Date Filed, and Petitioner	Status
8,155,012	IPR2016-00983, filed April 29, 2016 by Dell, Inc.	This IPR was terminated on February 6, 2017 pursuant to the joint motion to terminate following settlement.
	IPR2016-01425, filed July 13, 2016 by D-Link Systems, Inc.	This IPR was terminated on April 5, 2017 pursuant to the joint motion to terminate following settlement.
8,942,107	IPR2016-00569, filed February 12, 2016 by AMX LLC and Dell, Inc.	This IPR was terminated on January 20, 2017 pursuant to the joint motion to terminate following settlement.
	IPR2016-01757, filed September 8, 2016 by Aerohive Networks, Inc. to join IPR2016-00569	The institution of this IPR was denied as untimely.
	IPR2017-00752, filed January 23, 2017 by D-Link Systems, Inc.	This IPR was terminated on April 12, 2017 pursuant to the joint motion to terminate following settlement.
8,902,760	IPR2016-00574, filed February 29, 2016 by AMX LLC and Dell, Inc.	This IPR was terminated on January 20, 2017 pursuant to the joint motion to terminate following settlement.
	IPR2016-01759, filed September 8, 2016 by Aerohive Networks, Inc. to join IPR2016-00574	The institution of this IPR was denied as untimely.

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Patent	Petition, Date Filed, and Petitioner	Status
9,019,838	IPR2016-00573, filed March 3, 2016 by AMX LLC	This IPR was terminated on November 9, 2016 pursuant to the joint motion to terminate following settlement.
	IPR2016-01151, filed June 3, 2016 by Dell, Inc.	This IPR was terminated on January 20, 2017 pursuant to the joint motion to terminate following settlement.
	IPR2016-01426, filed July 13, 2016 by D-Link Systems, Inc.	Institution denied on January 12, 2017.
	IPR2016-01758, filed September 8, 2016 by Aerohive Networks, Inc. to join IPR2016-00573	The institution of this IPR was denied as untimely.

3. Ex Parte Reexamination

Additionally, there remain pending *ex parte* reexaminations on two of the four Patents-In-Suit. First, U.S. Patent No. 8,155,012 is subject to an *ex parte* reexamination, control number 90/013,740 filed on April 27, 2016. The USPTO granted the request for reexamination on June 21, 2016. All claims (1-148) are subject to *ex parte* reexamination, and all claims currently stand rejected.

Second, U.S. Patent No. 8,902,760 is subject to an *ex parte* reexamination, control number 90/013,802 filed on August 29, 2016. The USPTO granted the request for reexamination on November 18, 2016. All claims (1-219) are subject to *ex parte* reexamination, and all claims currently stand rejected.

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Dated: June 1, 2017

Respectfully submitted,

By: /s/ Talin Gordnia
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