

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

JUNIPER NETWORKS, INC.  
Petitioner

v.

CHRIMAR SYSTEMS, INC.  
Patent Owner

---

U.S. Patent No. 8,942,107

---

*Inter Partes* Review Case No.: Unassigned

---

**DECLARATION OF IAN CRAYFORD  
REGARDING U.S. PATENT NO. 8,942,107**

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

3468721

## TABLE OF CONTENTS

	<u>Page</u>
I. BACKGROUND AND QUALIFICATIONS .....	1
II. MATERIALS CONSIDERED .....	4
III. LEGAL STANDARDS .....	5
A. Anticipation .....	7
B. Obviousness.....	7
IV. RELEVANT BACKGROUND ON THE '107 PATENT .....	14
A. THE '107 PATENT .....	14
B. Description of the Alleged Invention of the '107 Patent.....	14
C. Level of Ordinary Skill .....	17
V. CLAIM CONSTRUCTION .....	18
VI. OPINIONS RELATING TO EACH OF THE GROUNDS .....	19
VII. IDENTIFICATION OF CHALLENGE AND REASONABLE LIKELIHOOD THAT THE CHALLENGED CLAIMS ARE UNPATENTABLE.....	20
A. <u>Ground 1</u> : The Challenged Claims Are Obvious Based on Hunter in View of Bulan. ....	21
1. Overview of Hunter in View of Bulan.....	21
a. Reasons to Combine Hunter and Bulan.....	23
b. The Combined System of Hunter and Bulan.....	27
c. Operation of Bulan's Current Control Apparatus .....	28
d. Hunter in View of Bulan: Step-by-Step .....	34
2. Application of Hunter in View of Bulan .....	37

	<u>Page</u>
a. Independent Claim 1 .....	37
b. Dependent Claim 5 .....	46
c. Dependent Claim 31 .....	46
d. Dependent Claim 43 .....	48
e. Dependent Claim 70 .....	49
f. Dependent Claim 72 .....	50
g. Dependent Claim 74 .....	51
h. Dependent Claim 75 .....	51
i. Dependent Claim 83 .....	51
j. Dependent Claim 103 (across 1, 5, 31, 43, 70, 72, and 75) .....	52
k. Independent Claim 104.....	54
l. Dependent Claim 111 .....	54
m. Dependent Claim 123 .....	55
n. Dependent Claim 125 (across 104, 111, and 123).....	55
 B. <u>Ground 2: The Challenged Claims Are Obvious Based on Bloch in View of Huizinga and IEEE 802.3.</u> .....	 55
1. Overview of Bloch in View of Huizinga and IEEE 802.3.....	56
a. Overview of Bloch.....	56
b. Overview of Huizinga .....	61
c. Overview of IEEE 802.3 (IEEE-93 and IEEE- 95).....	62

	<u>Page</u>
d.    The Combined System of Bloch, Huizinga, and IEEE 802.3 (-93 & -95).....	64
e.    Reasons for Combinability .....	65
2.    Application of Bloch in View of Huizinga and IEEE 802.3.....	67
a.    Independent Claim 1 .....	67
b.    Dependent Claim 5 .....	72
c.    Dependent Claim 31 .....	72
d.    Dependent Claim 43 .....	73
e.    Dependent Claim 70 .....	74
f.    Dependent Claim 72 .....	75
g.    Dependent Claim 74 .....	76
h.    Dependent Claim 75 .....	76
i.    Dependent Claim 83 .....	76
j.    Dependent Claim 103 (across 1, 5, 31, 43, 70, 72, and 75).....	77
k.    Independent Claim 104.....	78
l.    Dependent Claim 111 .....	78
m.    Dependent Claim 123 .....	78
n.    Dependent Claim 125 (across 104, 111, and 123).....	79
VIII. CONCLUSION.....	79

**DECLARATION OF IAN CRAYFORD.  
REGARDING U.S. PATENT NO. 8,942,107**

I, Ian Crayford, declare as follows:

1. I am an expert in the field of networking and communication systems.

I have been retained by Petitioner Juniper Networks, Inc. ("Juniper" or "Petitioner") to provide my independent, expert opinion and I submit this declaration on behalf of Petitioner to analyze, render opinions, and/or provide expert testimony regarding the invalidity of certain claims of U.S. Patent No. 8,942,107 ("the '107 patent"). I understand that Petitioner submitted the '107 patent as Exhibit 1001.

2. I am being compensated at my usual rate of \$425 per hour for the time spent by me in connection with these proceedings. This compensation is not contingent upon my opinions or the outcome of the proceedings. I have personal knowledge of the facts stated in this Declaration and, if called upon to do so, could and would attest to these facts under oath.

**I. BACKGROUND AND QUALIFICATIONS**

3. A detailed record of my professional qualifications, including a list of patents, academic and professional publications, is set forth in my curriculum vitae, which I understand has been submitted as Exhibit 1013.

# 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.