

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

CENTRIPETAL NETWORKS, INC.,	)	
	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	Civil Action No.: 2:17-cv-00383-HCM
	)	
KEYSIGHT TECHNOLOGIES, INC. and	)	Judge: Hon. Henry C. Morgan, Jr.
IXIA,	)	
	)	
<i>Defendants.</i>	)	
	)	

**DEFENDANTS KEYSIGHT TECHNOLOGIES, INC. AND IXIA’S
IDENTIFICATION OF PRIOR ART**

Pursuant to the Stipulation Order (Dkt. No. 199), and in addition to certain Accused Instrumentalities themselves as set forth in Defendants Keysight Technologies, Inc. and Ixia’s (collectively, “Defendants”) submitted Motion For Summary Judgment (Dkt. No. 145), Defendants identify the following prior art references.

1. CheckPoint R75
2. CheckPoint R75 documentation
3. CheckPoint R77.20
4. CheckPoint R77.20 documentation
5. TippingPoint Unity One 200
6. TippingPoint Unity One 200 manual
7. Poliwall manual (2010)
8. Poliwall video 1 (<https://www.youtube.com/watch?v=z62og8lNk5A>)
9. Poliwall Security Appliance

10. 8,955,128 (Trama)
11. 5,835,726 (Shwed)
12. 7,454,792 (Cantrell)
13. NTO 7300 manual
14. PacketSure manual
15. 2012/0304244 (Xie)
16. 2008/0072307 (Maes)
17. 8,438,270 (Nappier)
18. 9,419,942(Buruganahalli)
19. 7,185,356 (Tang)
20. 2009/0216875 (Shi)
21. OpenFlow Switch Specification, Version 1.1.0
22. 8,954,957 (Wu)
23. 2007/0147380 (Ormazabal)
24. Anue 5200 manual

Dated: July 5, 2018

Respectfully submitted,

By: /s/ Osman Mohammed
Christine M. Morgan (admitted *pro hac vice*)
cmorgan@reedsmith.com
James A. Daire (admitted *pro hac vice*)
jdaire@reedsmith.com
John P. Bovich (admitted *pro hac vice*)
jbovich@reedsmith.com
Osman Mohammed (admitted *pro hac vice*)
omohammed@reedsmith.com
REED SMITH LLP
101 Second Street, Suite 1800

San Francisco, CA 94105
Telephone: (415) 543-8700
Facsimile: (415) 891-8269

William R. Poynter (VSB #48672)
KALEO LEGAL
4456 Corporation Lane, Suite 135
Virginia Beach, VA 23462
Telephone: (757) 238-6383
Facsimile: (757) 304-6175
wpoynter@kaleolegal.com

*Counsel for Keysight Technologies, Inc. and
Ixia*

CERTIFICATE OF SERVICE

I hereby certify that on July 5, 2018 a complete copy of the foregoing document was served via electronic mail to the following counsel for Plaintiff Centripetal Networks, Inc.:

Paul J. Andre
Lisa Kobialka
James R. Hannah
Hanna Y. Lee
Greg C. Proctor
Hien K. Lien
Michael H. Lee
Kramer Levin Naftalis & Frankel LLP
990 Marsh Road
Menlo Park, CA 94025
Phone: (650) 752-1700
Fax: (650) 752-1800
Email: pandre@kramerlevin.com
lkobialka@kramerlevin.com
jhannah@kramerlevin.com
hlee@kramerlevin.com
gproctor@kramerlevin.com
hlien@kramerlevin.com
mhlee@kramerlevin.com

Stephen Edward Noona
Kaufman & Canoles, P.C.
150 W Main St
Suite 2100
Norfolk, VA 23510
Phone: (757) 624-3239
Fax: (757) 624-3169
Email: senoona@kaufcan.com

Cristina Lynn Martinez
Kramer Levin Naftalis & Frankel LLP
1177 Avenue of the Americas
New York, NY 10036
Phone: (212) 715-9100
Fax: (212) 715-8000
Email: cmartinez@kramerlevin.com

/s/ Nancy C. Tuttle

Nancy Tuttle