

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MOTIF FOODWORKS, INC.,
Petitioner,

v.

IMPOSSIBLE FOODS, INC.,
Patent Owner.

Case No. IPR2023-00206
Patent No. 9,943,096

PATENT OWNER'S UPDATED EXHIBIT LIST

EXHIBIT NO.	DESCRIPTION
2001	Request for Certificate of Correction, Certificate of Correction and Petition to Accept Unintentionally Delayed Benefit Claims Under 37 C.F.R. §§ 1.78(c) and 1.78(e) for US Patent No. 9,700,067 and US Patent No. 10,172,381
2002	Goldfine, “A brief history of Impossible Foods: how ‘bleeding’ plant-based burgers started a food industry trend,” The Business of Business, https://www.businessofbusiness.com/articles/impossible-foods-plant-based-burgers-milk-food-industry-trend-data/ , Last Accessed July 27, 2022
2003	Proulx, “Diversified strategies for improving iron bioavailability of maize” Ph.D. Thesis, Iowa State University, 2007
2004	Declaration of Dr. Keith Cadwallader, excerpt from ’306 patent prosecution file history, submitted October 17, 2017
2005	Declaration of Dr. Celeste Holz-Schietinger (dated December 2, 2016), excerpt from ’306 patent prosecution file history, submitted October 17, 2017
2006	Declaration of Dr. Celeste Holz-Schietinger (dated August 17, 2017), excerpt from ’306 patent prosecution file history, submitted October 17, 2017
2007	Declaration of Dr. Devin Grant Peterson, excerpt from ’306 patent prosecution file history, submitted October 17, 2017
2008	Declaration of Dr. S. Christopher Davis, excerpt from ’306 patent prosecution file history, submitted October 17, 2017
2009	Declaration of Dr. David Lipman, excerpt from ’306 patent prosecution file history, submitted October 17, 2017
2010	U.S. Patent Publication No. 2012/0093994 to Hseih et al.

2011	Cerny, “Formation of aroma compounds from ribose and cysteine during the Maillard Reaction” <i>J. Agric. Food Chem.</i> 51:2714-2721 (2003)
2012	File History of U.S. Provisional Application 61/671,069 filed on July 12, 2012.
2013	G. Reineccius, Flavor Chemistry and Technology 2 nd Ed., 2006, Chap. 7, “ <i>Off-Flavors and Taints in Foods</i> ”, p.161-199
2014	Email from the Patent Trial and Appeal Board dated April 3, 2023
2015	Petition to Accept Unintentionally Delayed Benefit Claims Under 37 C.F.R. §§ 1.78(C) and 1.78(E); Petition for Expedited Review under 37 C.F.R. §1.182; Supplemental Application Data Sheet, and Request for Certificate of Correction in U.S. Patent No. 9,943,096 filed on May 30, 2023; including copy of Petitioner’s Opposition to Patent Owner’s Motion Pursuant to 37 C.F.R. §1.323 [Paper 11]; copy of Order Granting Patent Owner’s Motion for Leave to Seek Certificate of Correction [Paper 15] issued May 22, 2023
2016	Claim Construction Order, <i>Impossible Foods Inc. v. Motif Foodworks, Inc.</i> , Case No. 1:22-cv-00311-WCB (D. Del. Aug. 15, 2023)
2017	Plaintiff Impossible Foods Inc.’s Opening Claim Construction Brief, <i>Impossible Foods Inc. v. Motif Foodworks, Inc.</i> , Case No. 1:22-cv-00311-WCB (D. Del. June 21, 2023)
2018	Declaration of Hal Alper, Ph.D., In Support of Plaintiff Impossible Foods Inc.’s Opening Claim Construction Brief, <i>Impossible Foods Inc. v. Motif Foodworks, Inc.</i> , Case No. 1:22-cv-00311-WCB (D. Del. June 14, 2023)
2019	Defendant Motif Foodworks, Inc.’s Answering Claim Construction Brief, <i>Impossible Foods Inc. v. Motif Foodworks, Inc.</i> , Case No. 1:22-cv-00311-WCB (D. Del. July 7, 2023)
2020	Declaration of Dr. Robert McGorin In Support of Motif’s Answering Claim Construction Brief, <i>Impossible Foods Inc. v.</i>

	<i>Motif Foodworks, Inc.</i> , Case No. 1:22-cv-00311-WCB (D. Del. June 28, 2023)
2021	Declaration of Dr. Jerrad Legako In Support of Motif's Answering Claim Construction Brief, <i>Impossible Foods Inc. v. Motif Foodworks, Inc.</i> , Case No. 1:22-cv-00311-WCB (D. Del. June 28, 2023)
2022	Declaration of Dr. Carl Batt In Support of Motif's Answering Claim Construction Brief, <i>Impossible Foods Inc. v. Motif Foodworks, Inc.</i> , Case No. 1:22-cv-00311-WCB (D. Del. June 28, 2023)
2023	Plaintiff Impossible Foods Inc.'s Claim Construction Reply Brief, <i>Impossible Foods Inc. v. Motif Foodworks, Inc.</i> , Case No. 1:22-cv-00311-WCB (D. Del. July 14, 2023)
2024	Reply Declaration of Hal Alper, Ph.D., In Support of Plaintiff Impossible Foods Inc.'s Claim Construction Reply Brief, <i>Impossible Foods Inc. v. Motif Foodworks, Inc.</i> , Case No. 1:22-cv-00311-WCB (D. Del. July 7, 2023)
2025	Declaration of Paul Sarnoski, Ph.D., In Support of Plaintiff Impossible Foods Inc.'s Claim Construction Reply Brief, <i>Impossible Foods Inc. v. Motif Foodworks, Inc.</i> , Case No. 1:22-cv-00311-WCB (D. Del. July 14, 2023)
2026	Defendant Motif Foodworks, Inc.'s Sur-reply Claim Construction Brief, <i>Impossible Foods Inc. v. Motif Foodworks, Inc.</i> , Case No. 1:22-cv-00311-WCB (D. Del. July 19, 2023)
2027	Supplemental Declaration of Dr. Robert McGorin In Support of Motif's Sur-reply Claim Construction Brief, <i>Impossible Foods Inc. v. Motif Foodworks, Inc.</i> , Case No. 1:22-cv-00311-WCB (D. Del. July 14, 2023)
2028	Declaration of Dr. Jerrad Legako In Support of Motif's Sur-reply Claim Construction Brief, <i>Impossible Foods Inc. v. Motif Foodworks, Inc.</i> , Case No. 1:22-cv-00311-WCB (D. Del. July 14, 2023)

2029	Supplemental Declaration of Dr. Carl Batt In Support of Motif's Sur-reply Claim Construction Brief, <i>Impossible Foods Inc. v. Motif Foodworks, Inc.</i> , Case No. 1:22-cv-00311-WCB (D. Del. July 14, 2023)
2030	Declaration of Michael C. Qian, Ph.D.
2031	<i>Curriculum Vitae</i> of Michael C. Qian, Ph.D.
2032	Transcript of September 7, 2023, Deposition of Rodrigo Tarté, Ph.D.
2033	Transcript of February 9, 2024, Deposition of Robert McGorin, Ph.D.
2034	Patent Owner's Demonstratives for Oral Argument

Respectfully submitted,

Date: April 1, 2024

/ Michael T. Rosato /
Michael T. Rosato, Lead Counsel
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CERTIFICATE OF SERVICE

I certify that the foregoing Patent Owner's Updated Exhibit List and Exhibit 2034 were served on this 1st day of April 2024, on the Petitioner at the following electronic service addresses:

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