

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

KEYSIGHT TECHNOLOGIES, INC. and
PALO ALTO NETWORKS, INC.,
Petitioner,

v.

CENTRIPETAL NETWORKS, LLC,
Patent Owner.

Case IPR2023-00446¹
U.S. Patent No. 10,567,343

PATENT OWNER'S UPDATED EXHIBIT LIST

¹ IPR2023-01353 has been joined with this proceeding.

PATENT OWNER'S EXHIBIT LIST

Exhibit	Description
2001	U.S. Pat. App. Pub. No. 2012/0084866 ("Stolfo")
2002	Petition for <i>Inter Partes</i> Review, <i>Palo Alto Networks, Inc.</i> , v. <i>Centripetal Networks, Inc.</i> , No. IPR2021-01155, Paper 2 (P.T.A.B. July 6, 2021)
2003	U.S. Patent No. 9,686,193
2004	Decision Denying Petitioner's Request for Rehearing of Decision on Institution, <i>Cisco Sys., Inc. v. Centripetal Networks, Inc.</i> , No. IPR2018-01559, Paper 9 (P.T.A.B. Sept. 18, 2019)
2005	Complaint for Patent Infringement, <i>Centripetal Networks, Inc. v. Keysight Technologies, Inc.</i> , No. 2:22-cv-00002, Dkt. No. 1 (E.D. Va. Jan. 1, 2022)
2006	Affidavit of Service of Complaint, <i>Centripetal Networks, Inc. v. Keysight Technologies, Inc.</i> , No. 2:22-cv-00002, Dkt. No. 14 (E.D. Va. Jan. 15, 2022)
2007	Opinion and Order, <i>Centripetal Networks, Inc. v. Cisco Systems, Inc.</i> , No. 2:18-cv-00094-HCM-LRL, Dkt. No. 621 (E.D. Va. Oct. 5, 2020)
2008	Petition for <i>Inter Partes</i> Review, <i>Palo Alto Networks, Inc.</i> , v. <i>Centripetal Networks, LLC</i> , No. IPR2023-01353, Paper 3 (P.T.A.B. Sept. 5, 2023)
2009	Motion for Joinder to <i>Inter Partes</i> Review IPR2023-00446, <i>Palo Alto Networks, Inc.</i> , v. <i>Centripetal Networks, LLC</i> , No. IPR2023-01353, Paper 2 (P.T.A.B. Sept. 5, 2023)
2010	Declaration of Dr. Michael Goodrich in Support of Patent Owner's Response

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IPR2023-00446 (U.S. Patent No. 10,567,343)

Exhibit	Description
2011	Transcript of the Deposition of Dr. Stuart Staniford, <i>Keysight Techs., Inc. v. Centripetal Networks, Inc.</i> , No. IPR2023-00446 taken on October 10, 2023
2012	Memorandum Opinion and Order regarding Claim Construction, <i>Centripetal Networks, LLC v. Palo Alto Networks, Inc.</i> , No. 21-cv-00137-EWH (E.D. Va Oct. 11, 2023)
2013	Stack Overflow website - Linux – Directory last modified date, printed October 30, 2023
2014	Snort Users Manual 2.9.0. The Snort Project, March 25, 2011
2015	“Bleeding Edge Threats SID Allocation,” Emerging Threats.com archived at Internet Archive Wayback Machine on July 13, 2010 at https://web.archive.org/web/20100713225120/http://doc.emergingthreats.net/bin/view/Main/SidAllocation
2016	“Emerging Threats - Ruleset Downloads,” Emerging Threats.com archived at Internet Archive Wayback Machine on July 13, 2010 at https://web.archive.org/web/20100713225532/http://doc.emergingthreats.net/bin/view/Main/AllRulesets?cover=print
2017	M. Jonkman. “Emerging Threats FAQs,” Emerging Threats.com. Sept. 25, 2009 archived at Internet Archive Wayback Machine on December 11, 2010 at https://web.archive.org/web/20101211164740/http://doc.emergingthreats.net:80/bin/view/Main/EmergingFAQ
2018	M. Jonkman. “[Bleeding-sigs] New SSL/TLS State Machine” July 5, 2006 <i>available at</i> https://marc.info/?l=bleeding-sigs&m=115211167327075&w=2
2019	“[Bleeding-sigs] Bleeding Snort Daily Signature Changes,” July 6, 2006 <i>available at</i> https://marc.info/?l=bleeding-sigs&m=115214763102517&w=2

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IPR2023-00446 (U.S. Patent No. 10,567,343)

Exhibit	Description
2020	“[Bleeding-sigs] Bleeding Snort Daily Signature Changes,” July 10, 2006 <i>available at</i> https://marc.info/?l=bleeding-sigs&m=115249327727892&w=2
2021	M. Jonkman. “Re: [Bleeding-sigs] BLEEDING-EDGE POLICY TLS/SSL Encrypted Application,” May 28, 2007 <i>available at</i> https://marc.info/?l=bleeding-sigs&m=118038810828100&w=2
2022	Commented rules – Rules – Suricata, Forum post by member of Emerging Threats rule writing team, printed October 29, 2023, https://forum.suricata.io/t/commented-rules/2283/3
2023	Data Exfiltration: How Data Gets Out, dated March 26, 2010, <i>available at</i> https://www.computerworld.com/article/2763043/data-exfiltration--how-data-gets-out.html
2024	Giani, A., et al., Detection of Covert Channel Encoding in Network Packet Delays, dated November 2005 <i>available at</i> https://web.archive.org/web/20100415192945/https://ists.dartmouth.edu/library/149.pdf
2025	Enterprise Strategy Group (ESG) White Paper - Centripetal Networks Threat Intelligence Gateway, by Tony Palmer (May 2018)
2026	American Banker Webpage – Top 10 FinTech Companies to Watch, published November 6, 2013 https://www.americanbanker.com/slideshow/top-10-fintech-companies-towatch?slide=2
2027	Gartner - Cool Vendors in Security for Technology and Service Providers, 2017, published May 4, 2017
2028	Centripetal Press Release - Centripetal Networks Named SINET 16 Innovator for 2017, dated October 31, 2017

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IPR2023-00446 (U.S. Patent No. 10,567,343)

Exhibit	Description
2029	Listing of Dr. Staniford's Internet Archive Wayback Machine Browsing History, provided by Petitioner's counsel for IPR2023-00446 on October 25, 2023
2030	Internet Archive Wayback Machine - Full directory listing of Rules.emergingthreats.net, printed on October 18, 2023
2031	Declaration of Pedro Marinho in Support of Patent Owner's Response
2032	Patent Owner's Demonstratives

Respectfully submitted,

Dated: May 1, 2024

/James Hannah/

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(Case No. IPR2023-00446)

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CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. § 42.6(e), and pursuant to agreement by the parties that filing with the Board through the Patent Trial and Appeal Case Tracking System (P-TACTS) constitutes electronic service, that service was made on Petitioner as detailed below.

<i>Date of service</i>	May 1, 2024
<i>Manner of service</i>	Electronic Filing with the Board
<i>Documents served</i>	PATENT OWNER'S UPDATED EXHIBIT LIST
<i>Persons Served</i>	REED SMITH LLP Gerard M. Donovan Peter J. Chassman Walter M. Egbert Jonathan I. Detrixhe Sidharth Kapoor gdonovan@reedsmith.com pchassman@reedsmith.com wegbert@reedsmith.com jdetrixhe@reedsmith.com skapoor@reedsmith.com ROPES & GRAY LLP James L. Davis, Jr. Andrew Radsch james.l.davis@ropesgray.com andrew.radsch@ropesgray.com

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