UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SIEMENS MOBILITY, INC., GROUND TRANSPORTATION SYSTEMS USA, INC., HUMATICS CORP., and PIPER NETWORKS, INC.,

Petitioners,

v.

METROM RAIL, LLC

Patent Owner.

Inter Partes Review No. IPR2023-00470
Patent 8,812,227

PATENT OWNER'S UPDATED EXHIBIT LIST

Pursuant to 37 C.F.R. § 42.63(e), Patent Owner, Metrom Rail, LLC hereby submits a current listing of Patent Owner's Exhibits.

UPDATED EXHIBIT LIST

Exhibit #	Description
2001	Garcia, Cristina & Lehner, Andreas & Strang, Thomas & Rockl, Matthias. (2007). Comparison of Collision Avoidance Systems and Applicability to Rail Transport. 1 - 6. 10.1109/ITST.2007.4295927.
2002	'131 Claim Chart for Claim 1 (IPR2023-00468)
2003	Declaration of Rajendra A. Chiplunkar in Support of Motion for *Pro Hac Vice* Admission
2004	Scott Andrews' CV
2005	Scott Andrews Summary of Litigation Experience
2006	LinkedIn page of Scott Andrews
2007	Deposition Transcript of Scott Andrews, taken 8/28/2023
2008	Declaration of James A. Marchi
2009	Declaration of Kurt A. Gunther, P.E.
2010	Resume of Kurt A. Gunther, P.E.
2011	Declaration of Dr. Todor Cooklev
2012	Declaration of Carl Conti
2013	Web page – www.pipernetworks.com, retrieved on September 8, 2023
2014	Photograph of the MTA "Genius Award", March 2018.

Exhibit #	Description
2015	MTA Press Release: MTA Announces 8 Winners of MTA Genius Transit Challenge, 3/9/2018
2016	https://web.archive.org/web/20130602090958/http://metrom-rail.com/aura-collision-avoidance-system and attachment
2017	https://web.archive.org/web/20210805044759/https://www.pipernetworks.com/asset-tracking-rtls-solutions/
2018	https://web.archive.org/web/20211026212904/https://www.pipernetworks.com/asset-tracking-rtls-solutions/
2019	AURA MOW Product Specification
2020	HELIX MOW Limits Compliance & Collision Avoidance System (LCCAS) Product Specification
2021	AURA-Helix Comparison Chart
2022	Helix Claim Chart
2023	AURA Claim Chart
2024	https://novelda.com/articles/uwb-tech/understanding-ultra-wideband-uwb-technology, retrieved on September 13, 2023
2025	LinkedIn page of David Garcia
2026	Not Used
2027	Declaration of Nathaniel E. Frank-White with Exhibit A
2028	Withdrawn
2029	Withdrawn

Exhibit #	**Description**
Proposed 2030	Piper sales collateral for its systems. Collected at the 2023 "NextGen Signalling" convention on October 26, 2023. Marked at the deposition of Kurt Gunther on November 15, 2023
Proposed 2031	Piper, Helix sales collateral for its systems. Collected at the 2023 "NextGen Signalling" convention on October 26, 2023. Marked at the deposition of Kurt Gunther on November 15, 2023
Proposed 2032	E-mail dated October 12, 2018, from David Garcia to Himanshu Patel, copying PO's employees.
Proposed 2033	E-mail dated October 12, 2018, from David Garcia to Metrom Rail employees.
Proposed 2034	Photograph of a speaking panel at the 2018 NextGen Train Control conference.
Proposed 2035	Photograph of David Garcia speaking at the 2018 NextGen Train Control conference.
Proposed 2036	Transcript and of David Garcia speaking at the 2018 NextGen Train Control Conference, presenting slides represented in Exhibits 2032 and 2033.
Proposed 2037	Deposition Transcript of Kurt Gunther, taken 11/15/2023
Proposed 2038	Deposition Transcript of James Marchi, taken 11/30/2023
2039	Patent Owner's Oral Argument Demonstratives

Respectfully submitted,

Date: March 25, 2024

/s/ Gregory C. Schodde

Gregory C. Schodde
Reg. No. 36,668
McAndrews, Held & Malloy, Ltd.
500 West Madison Street, 34th Floor
Chicago, Illinois 60661
(312) 775-8000
(312) 775-8100
gschodde@mcandrews-ip.com

Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies that on March 25, 2024, a copy of **Patent Owner's Updated Exhibit List** was served via email to the Petitioners' counsel at the following:

howard@wisnialaw.com
nspeed@wolfgreenfield.com
gnieberg-ptab@wolfgreenfield.com
msupko@crowell.com
jjames@crowell.com
kschmitz@crowell.com
thatcher.rahmeier@faegredrinker.com
zach.kachmer@faegredrinker.com
ncunningham@dority-manning.com
smoore@dority-manning.com

Date: March 25, 2024

/s/ Gregory C. Schodde/

Gregory C. Schodde
Reg. No. 36,668
McAndrews, Held & Malloy, Ltd.
500 West Madison Street, 34th Floor
Chicago, Illinois 60661
(312) 775-8000
(312) 775-8100