

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VIKING DRILL & TOOL, INC.

Petitioner

v.

HONGJIA WANG

Patent Owner

IPR2023-00473

U.S. Patent No. 11,007,583

EXHIBIT LIST
TO PATENT OWNER'S CORRECTED PRELIMINARY RESPONSE TO
PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 11,007,583
UNDER 35 U.S.C. § 311-219 AND 37 CFR § 42.100 ET SEQ.

Pursuant to 37 CFR § 42.107(a), Patent Owner submits the following amended preliminary response to the Petition.

TABLE OF EXHIBITS

Exhibit No.	Description
2001	Declaration of Kelly W. Cunningham
2002	Declaration of David Fisher
2003	Declaration of William J. Endres
2004	Plaintiffs Tsteigen and Hongjia Wang’s Patent Infringement Claim Chart for U.S. Patent No. 11,007,583 (Exhibit 6 to Plaintiffs Tsteigen, Inc. and Hongjia Wang’s First Amended Complaint, <i>Tsteigen, Inc. d/b/a Tec-Spiral; Hongjia Wang v. Viking Drill & Tool, Inc. a/k/a Consolidated Toledo Drill</i> , Case No. 0:21-cv-02759-KMM-HB (D. Minn) “Civil Action,” [ECF 102-1, pp. 58-68]) (March 30, 2023)
2005	Defendant, Viking Drill and Tool, Inc.’s Invalidity and Prior Art Statement and Claim Charts, in the Civil Action (July 13, 2022)
2006	Plaintiffs Tsteigen and Hongjia Wang’s Amended Response to Defendant Viking’s Patent invalidity Contentions, in the Civil Action (August 19, 2022)
2007	Defendant, Viking Drill and Tool, Inc.’s Invalidity and Prior Art Statement and Claim Charts Concerning Claims 15, 18-19, 22 of U.S. Patent No. 11,007,583, in the Civil Action (September 30, 2022)
2008	Plaintiffs Tsteigen and Hongjia Wang’s Response to Defendant Viking’s Invalidity Statement and Prior Art Charts Re Claims 15, 18, 19, and 22 U.S. Patent No. 11,007,583, in the Civil Action (October 7, 2022)
2009	Plaintiffs Tsteigen and Hongjia Wang’s Supplement to Its Amended Response to Defendant’s Patent Invalidity Contentions, in the Civil Action (November 4, 2022)
2010	Order on Stipulation to Amend Pretrial Management Order, in the Civil Action [ECF 97] (February 17, 2023)
2011	Webpage: Matco - Matco DH29HSG Drill Bit Product Page and Review
2012	Webpage: TechShop - Hyper-Step Drill Bit Review
2013	YouTube: Tool Showcase: Matco Colbalt Hyper-Step Drill Bits
2014	YouTube: All this hype true about the Matco Hyper Step Drill Bits? Walker/master-craft/Matco
2015	YouTube: Flat Rate Master – Matco Hyper-Step Drill Bits DB29HS
2016	YouTube: Mustang Aficionado – Matco Hyper-Step Drill Bits Have No Chill
2017	YouTube: Koon Trucking – Matco Tools: Cobalt HyperStep Drill Bits VS Standard HyperStep Drill Bits HEAD TO HEAD
2018	YouTube: BVC OFFROAD – The BEST drill bits I’ve ever used?! MATCO Hyper Step Drill Bit Review TOOL Tuesday
2019	Webpage: Garage Gazette - Matco Hyper-Step Drill bits
2020	Webpage: The Hobby Machinist – A “New Style” Drill Bit

2021	Webpage: The Garage Journal – Co-worker gets Matco’s new “Hyper-Step” drill bits: “These drill through everything”
2022	Webpage: The Garage Journal – Norseman Vortex Point (User comment)
2023	Webpage: Kimball Midwest – 29pc Super Primalloy Ultra Step Drill Bit Set (1/16 – 1/2)_
2024	Webpage: Norseman Drill & Tool – VORTEX-POINT™ Mechanics Length
2025	Webpage: Viking Drill – Type 250-VT Mechanics Length 135° Split Point
2026	Webpage: KnKut – KnKut 29 Piece Mechanics Length Step Point Drill Bit Set 1/16”-1/2” by 64ths
2027	Webpage: Winzer – 3/16” Mechanics Length Cyclone 3 Flats Step Drill
2028	Webpage: Steel Vision Tools – 29 Piece Stepped Drill Bit Set - 63200
2029	Webpage: VIM Tools – HSSC29 29 Piece M35 Cobalt Multi-Pilot Drill Bit Set
2030	Wurth Prize for High Quality and Reliability of Supply to Tec-Spiral Enterprises Co., Ltd.
2031	Motion Hearing Court Minutes, in the Civil Action [ECF 30] (June 1, 2022)
2032	EFS Transmission Sheet re: Request for Ex Parte Reexamination, Control No. 90/014,941 (January 13, 2022)
2033	Ex Parte Reexamination Communication Transmittal Form, Control No. 90/014,941 (June 2, 2022)

CERTIFICATE OF SERVICE UNDER 37 CFR § 42.6(e)

I hereby certify that a true copy of the foregoing EXHIBIT LIST TO PATENT OWNER'S CORRECTED PRELIMINARY RESPONSE TO PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO. 11,007,583 UNDER 35 U.S.C. § 311-219 AND 37 CFR § 42.100 ET SEQ. has been served in its entirety this 14th day of June 2023, by electronic mail on Petitioner's lead counsel, as follows:

J. Derek Vandenburg (Lead Counsel)
Registration No. 32,179
Carlson, Caspers, Vandenburg & Lindquist, P.A.
225 South Sixth Street, Suite 4200
Minneapolis, MN 55402
Email: DVandenburg@carlsoncaspers.com

/Kelly W. Cunningham/
Kelly W. Cunningham
USPTO Reg. No. 43,750
Lead Counsel for the Patent Owner,
Hongjia Wang