UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VIKING DRILL & TOOL, INC.
Petitioner

v.

HONGJIA WANG
Patent Owner

IPR2023-00474

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

PATENT OWNER'S UPDATED EXHIBIT LIST

PATENT OWNER'S UPDATED EXHIBIT LIST

January 17, 2024

Exhibit No.	Description
2001	Declaration of Kelly W. Cunningham in Support of Patent Owner's Preliminary Response to Petition
2002	Declaration of David Fisher in Support of Patent Owner's Preliminary Response to Petition
2003	Declaration of William J. Endres in Support of Patent Owner's Preliminary Response to Petition
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, *Tsteigen, Inc. d/b/a Tec-Spiral; Hongjia Wang v. Viking Drill & Tool, Inc. a/k/a Consolidated Toledo Drill*, 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 DB29HSG Drill Bit Product Page and Review
2012	Webpage: TechShop - Hyper-Step Drill Bit Review
2013	YouTube: Tool Showcase: Matco Cobalt 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)
2034	Corrected and Supplemental Declaration of William J. Endres in Support of Patent Owner’s Response to Petition
2035	Declaration of Hongjia Wang in Support of Patent Owner’s Response to Petition

2036	Declaration of David Fisher in Support of Patent Owner's Response to Petition
2037	Declaration of Kelly W. Cunningham in Support of Patent Owner's Response to Petition
2038	Curriculum Vitae of William J. Enders
2039	Spreadsheet: Sales of Matco Hyper-Step and Astro ONYX TurboStep Drills, 2018 through March 2023 - TS024541
2040	Email: January 23, 2020 to February 3, 2020 email chain between David Fisher and Nicholas Haitz - TS023581
2041	Webpage: Matco - Matco DB29HSRG Drill Bit Product Page
2042	Webpage: Matco - Matco DB4HSL and DB4HSXL Drill Bit Product Pages
2043	Webpage: Matco - Matco DBC21HSM Drill Bit Product Page
2044	Webpage: Matco - Matco DBC29HSRM Drill Bit Product Page
2045	Webpage: Matco - Matco DBC29HSRMS Drill Bit Product Page
2046	Astro Marketing Flying and Product Information Sheet for TS21 and TS29 ONYX TurboStep drill bits
2047	Email: May 16, 2019 to June 21, 2019 email exchange between David Fisher and Scott Hollander – TS008754

2048	Webpage: Cornwell Tools – Cornwell Tools 29 Piece Tempest Point Mechanic's Length Drill Bit Set
2049	Video: Tool Showcase: Matco Cobalt Hyper-Step Drill Bits
2050	RESERVED (Video Omitted Due to File Size)
2051	Video: Flat Rate Master – Matco Hyper-Step Drill Bits DB29HS
2052	Video: Mustang Aficionado – Matco Hyper-Step Drill Bits Have No Chill
2053	RESERVED (Video Omitted Due to File Size)
2054	RESERVED (Video Omitted Due to File Size)
2055	Email: April 11, 2019 to April 12, 2019 email re: Matco Hyper-Step Drill Bits -VIKINGVP_00002425
2056	Email: April 22, 2019 to September 11, 2019 email re: Matco Hyper-Step - VIKINGVP_00002439
2057	Email: December 6, 2019 to March 6, 2020 email re: Hyper Step - VIKINGVP_00002479
2058	Kimball Midwest 2022 Cutting Tools Promotion - Kimball00000006
2059	Testing Document - Kimball00000116
2060	Product Line 2020 Business Update Meeting – January - Kimball00000092

2061	Email: April 14, 2020 to April 22, 2020 email re: Ultra Step Drill Bit – UPDATE - Kimball00000196
2062	Email: August 28, 2020 Email re: Hyper drill drawing, with attachment - VIKINGVP_00002497-VIKINGVP_00002498
2063	Email: June 9, 2021 Email re: drill drawing, with attachments VIKINGVP_00002837-VIKINGVP_00002850
2064	Norseman Matco Cross Reference Spreadsheet - VIKINGVP_00002654
2065	Viking Drill Financial Statement – Vortex Drill Products - VIKINGVP_00003725
2066	Viking Drill Sales Spreadsheet – Vortex Drill Products - VIKINGVP_00003720
2067	Email: March 19, 2021 to Match 20, 2021 email FW: *URGENT* Vortex Drill Bits – Private Label - VIKINGVP_00002717
2068	Email: December 23, 2020 email re: Acme Tools Note Pad Coop Claim with attachments - VIKINGVP_00002656-VIKINGVP_00002658
2069	Email: April 6, 2021 email re: Drill Bits, with attachments - VIKINGVP_00002769-VIKINGVP_00002772

2070	Email: December 9, 2020 email re: Vortex with attachments - VIKINGVP_00002625-VIKINGVP_00002628
2071	Excerpts of Transcript of July 10, 2023 Deposition of Scott Roussin
2072	Transcript of the September 26, 2023, Cross-Examination of Steven R. Schmid
2073	RESERVED
2074	Nexus Patent Claim Chart, Comparing ‘583 Patent Claims to 5/32” Matco Hyper-Step High-Speed Steel drill bit
2075	Nexus Patent Claim Chart, Comparing ‘583 Patent Claims to 1/2” Matco Hyper-Step High-Speed Steel drill bit
2076	Nexus Patent Claim Chart, Comparing ‘583 Patent Claims to 5/32” Matco Hyper-Step High-Speed Steel Reduced Shank drill bit
2077	Nexus Patent Claim Chart, Comparing ‘583 Patent Claims to 1/2” Matco Hyper-Step High-Speed Steel Reduced Shank drill bit
2078	RESERVED
2079	RESERVED
2080	RESERVED
2081	Nexus Patent Claim Chart, Comparing ‘583 Patent Claims to 1” Matco Hyper-Step High-Speed Steel drill bit

2082	Nexus Patent Claim Chart, Comparing ‘583 Patent Claims to 5/32” Matco Hyper-Step Cobalt drill bit
2083	Nexus Patent Claim Chart, Comparing ‘583 Patent Claims to 3/8” Matco Hyper-Step Cobalt drill bit
2084	RESERVED
2085	RESERVED
2086	Nexus Patent Claim Chart, Comparing ‘583 Patent Claims to 5/32” Matco Hyper-Step Cobalt Reduced Shank Stubby drill bit
2087	Nexus Patent Claim Chart, Comparing ‘583 Patent Claims to 1/2” Matco Hyper-Step Cobalt Reduced Shank Stubby drill bit
2088	Nexus Patent Claim Chart, Comparing ‘583 Patent Claims to 5/32” Astro ONYX TurboStep drill bit
2089	Nexus Patent Claim Chart, Comparing ‘583 Patent Claims to 1/2” Astro ONYX TurboStep drill bit
2090	Infringement Patent Claim Chart, Comparing ‘583 Patent Claims to 1/2” Viking Type 250-VT Vortex Point drill bit
2091	RESERVED
2092	RESERVED
2093	RESERVED

2094	Third-Party Copying Patent Claim Chart, Comparing '583 Patent Claims to 11/64" Steel Vision Stepped Tip drill bit
2095	Third-Party Copying Patent Claim Chart, Comparing '583 Patent Claims to 1/2" Steel Vision Stepped Tip drill bit
2096	Third-Party Copying Patent Claim Chart, Comparing '583 Patent Claims to 11/64" VIM HSSC29 drill bit
2097	Third-Party Copying Patent Claim Chart, Comparing '583 Patent Claims to 1/2" VIM HSSC29 drill bit
2098	WordWeb Pro, Oxford University Press, Spiral Definition
2099	ASM International Metals Handbook, Ninth Edition, Vol. 16, Machining
2100	Cutting Tool Engineering, March 2023, Vol. 75, Issue 3, *Taking a deep dive into deep-hole drilling*
2101	D. Biermann et al., *Deep Hole Drilling*, CIPR Annals Manufacturing Technology (2018)
2102	K. McDonald, *Deep Hole Drilling for the Rear Endplate of the BaBar Drift Chamber* (April 13, 1996)
2103	Headquarters, Department of the Army, *Fundamentals of Machine Tools* (October 1996)

2104	Master Fluid Solutions, *Technical Bulletin: Gun Drilling* (Rev. April 10, 2020)
2105	Declaration of Steven R. Schmid in Support of Petition for Inter Partes Review, IPR2023-00474 (Ex. 1004 in IPR2023-00474)
2106	Supplemental Evidence (CFR § 42.64) – Declaration of David Fisher in Support of Admissibility of Exhibit 2039
2107	Email: November 1, 2023 email re: Viking Drill & Tool v. Wang – IPR2023-00473 and IPR2023-00474 – Patent Owner's Responses, with attachments – 17956-9 Response to Viking's Petition IPR2023-00473(11062568.8); 17956-10 Response to Viking's Petition IPR2023-00474(11062635.6)
2108	Email: November 1, 2023 email re: Viking Drill & Tool v. Wang – IPR2023-00473 and IPR2023-00474 – Patent Owner's Responses
2109	Email: November 4, 2023 email re: Viking Drill & Tool v. Wang – Civil Action No. 0:21-cv-02759 (JWB/JFD – Protective Order Violations, with attachments – Combined declaration of William J Endres iso responses to petitions
2110	Email: August 24, 2023 email re: Viking Drill & Tool v. Wang – IPR2023-00473 and IPR2023-00474

2111	Email: August 23, 2023 email re: Viking Drill & Tool v. Wang – IPR2023-00473 and IPR2023-00474
2112	Declaration of Kelly Cunningham in Support of Patent Owner's Opposition to Motion to Strike
2113	Declaration of Sarah Jupina in Support of Patent Owner's Opposition to Motion to Strike
2114	Timeline of Events for Petitioner's Motion to Strike with Patent Owner Wang's Edits Added in Red
2115	Patent Owner's Copy of Paragraphs added to Corrected and Supplemental Decaration of Dr. William Endres filed on November 7, 2023
2116	Emails: October 31, 2023 re: PTACTS filings in IPR2023-00473 and IPR2023-00474
2117	Declaration of Kelly Cunningham in Support of Patent Owner's Response to Order to Show Cause
2118	Excerpts of Transcript of February 16, 2024 Deposition of Steven Schmid (Sealed)
2119	Excerpts of Transcript of February 13, 2024 Deposition of Taylor Fulk (Sealed)

CERTIFICATE OF SERVICE UNDER 37 CFR § 42.6(e)

I hereby certify that a true copy of the foregoing PATENT OWNER'S UPDATED EXHIBIT LIST has been served in its entirety this 17th day of January 2024, by electronic mail on Petitioner's lead counsel, as follows:

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

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