

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTUITION MACHINES, INC. AND CLOUDFLARE, INC.,
Petitioners,

v.

HUMAN DIFFERENTIAL INTELLIGENCE, LLC,
Patent Owner.

Case IPR2023-00631
Patent No. 8,752,141

PETITIONERS' UPDATED EXHIBIT LIST

Pursuant to 37 C.F.R. § 42.63(e), Petitioners Intuition Machines, Inc. and Cloudflare, Inc. hereby submit a current listing of Petitioners' exhibits. Confidential Exhibit 1062 is being filed today.

Exhibit	Description
1001	U.S. Patent No. 8,752,141 ("the '141 Patent")
1002	Declaration of Daniel P. Lopresti, Ph.D ("Lopresti")
1003	Curriculum vitae of Daniel P. Lopresti, Ph.D
1004	File History for U.S. Patent No. 8,752,141 ("the '141 FH")
1005	U.S. Provisional Application No. 61/076,495 ("HDI's Provisional")
1006	U.S. Patent Appl. Pub. No. 2008/0127302 A1 ("Qvarfordt")
1007	von Ahn, et al., "CAPTCHA: Using Hard AI Problems for Security" (2003). In: Biham E. (eds) Advances in Cryptology – EUROCRYPT 2003, pp. 294-311. Lecture Notes in Computer Science, vol 2656. ("vonAhn")
1008	von Ahn, "Human Computation," CMU-CS-05-193, Carnegie Mellon University School of Computer Science, December 7, 2005 ("vonAhn 2005")
1009	U.S. Patent Appl. Pub. No. 2009/0113294 A1 ("Sanghavi")
1010	U.S. Patent Appl. Pub. No. 2009/0313694 A1 ("Mates")
1011	Greg Kochanski, Daniel Lopresti, and Chilin Shih, "A Reverse Turing Test Using Speech," Proceedings of the 7th International Conference on Spoken Language Processing, pp. 1357-60, September 16-20, 2002 ("Kochanski")
1012	U.S. Patent Appl. Pub. No. 2007/0201745 A1 ("Wang")
1013	U.S. Patent Appl. Pub. No. 2007/0192849 A1 ("Golle")
1014	U.S. Patent Appl. Pub. No. 2008/0066014 A1 ("Misra")
1015	U.S. Patent No. 6,195,698 ("Lillibridge")
1016	U.S. Patent Appl. Pub. No. 2009/0249477 A1 ("Punera")
1017	Datta, et al., "IMAGINATION: A Robust Image-based CAPTCHA Generation System." In Proceedings of the 13th Annual ACM International Conference on Multimedia, pages 331–334, November 2005. ("Datta")
1018	U.S. Patent No. 8,510,795 ("Gargi")
1019	U.S. Patent Appl. Pub. No. 2009/0319270 A1 ("Gross")
1020	U.S. Patent Appl. Pub. No. 2007/0250920 ("Lindsay")

Exhibit	Description
1021	U.S. Patent No. 5,578,991 (“Scholder”)
1022	U.S. Patent No. 5,835,298 (“Edgerton”)
1023	World Intellectual Property Organization International Publication No. WO 2006/060077 A1 (“Clifford”)
1024	U.S. Patent No. 7,059,182 (“Ragner”)
1025	U.S. Patent Appl. Pub. No. 2006/0193113 A1 (“Cohen”)
1026	U.S. Patent No. 7,142,385 (“Shimotono”)
1027	U.S. Patent Appl. Pub. No. 2007/0259716 A1 (“Mattice”)
1028	U.S. Patent Appl. Pub. No. 2007/0298751 A1 (“Wulff”)
1029	U.S. Patent Appl. Pub. No. 2008/0108340 A1 (“Karstens”)
1030	European Patent Application Publication No. EP 1845468 A1 (“Karrer”)
1031	European Patent EP 2130159B1 (“Baker”)
1032	Shirali-Shahreza, et al., “Bibliography of Works Done on CAPTCHA,” 2008 3rd International Conference on Intelligent System and Knowledge Engineering, November 17-19, 2008
1033	Merriam-Webster’s Collegiate Dictionary, Eleventh Edition (2007), p. 840 (definition of “noise”), p. 1302 (definition of “threshold”)
1034	Declaration of Rachel J. Watters, with attachments
1035	Declaration of Mary K. Bolin, Ph.D., with attachments
1036	Declaration of Jessica Benner, with attachment
1037	Declaration of Professor Kawahara Tatsuya, with attachment
1038	Human Differential Intelligence LLC v. Cigna Corporation, No. 6:20-cv-00305-ADA (W.D. Tex.), D.I. 19 (Corrected First Amended Complaint)
1039	Human Differential Intelligence LLC v. The Gap, Inc., No. 6:20-cv-00307-ADA (W.D. Tex.), D.I. 14 (Corrected First Amended Complaint)
1040	Human Differential Intelligence LLC v. Bed Bath & Beyond, Inc., Civil Action No. 6:20-cv-00310-ADA (W.D. Tex.), D.I. 13 (Corrected First Amended Complaint)
1041	Human Differential Intelligence LLC v. CVS Health Corporation, Civil Action No. 6:20-cv-00311-ADA (W.D. Tex.), D.I. 18 (First Amended Original Complaint)
1042-1052	Reserved
1053	U.S. Patent Appl. Pub. No. 2010/0077209 A1 (“Broder”)
1054	U.S. Patent Appl. Pub. No. 2009/0055910 A1 (“Lee”)

Exhibit	Description
1055	U.S. Patent Appl. Pub. No. 2007/0150745 A1 (“Peirce”)
1056	Declaration of Jessica Benner, with attachment (Feb. 17, 2023)
1057	Declaration of Rachel J. Watters, with attachments (Feb. 20, 2023)
1058	Declaration of Kelley Hayes Greenhill, with attachments (Feb. 22, 2023)
1059	Human Differential Intelligence LLC v. Cloudflare, No. 1:22-cv-01334 (W.D. Tex.), D.I. 13 (Order Staying Case) (Jan. 18, 2023)
1060	Human Differential Intelligence LLC v. Cloudflare, No. 1:22-cv-01334 (W.D. Tex.), PACER Docket (Feb. 22, 2023)
1061	Human Differential Intelligence LLC v. Cloudflare, No. 1:22-cv-01334 (W.D. Tex.), D.I. 1 (Complaint)
1062	Confidential Settlement Agreement (FILED UNDER SEAL)

Respectfully submitted,

Date: September 26, 2023

By: /Elliot C. Cook/
Elliot C. Cook, Reg. No. 61,769
Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing **Petitioners' Updated Exhibit List** and **Confidential Exhibit 1062** were served on September 26, 2023, via email directed to counsel of record for the Patent Owner at the following:

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Patent Owner has consented to service by email.

Dated: September 26, 2023

/William Esper/
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