

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 IPR2023-00632
Patent No. 9,192,861

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. 9,192,861 ("the '861 Patent")
1002	Declaration of Daniel P. Lopresti, Ph.D
1003	Curriculum vitae of Daniel P. Lopresti Ph.D
1004	File history of the '861 Patent
1005	U.S. Provisional Application No. 61/076,495 ("HDI's Provisional")
1006	U.S. Patent No. 8,214,891 ("Seacat")
1007	U.S. Patent Application Publication No. 2007/0259716 ("Mattice")
1008	Sajad Shirali-Shahreza, <i>et al.</i> , "CAPTCHA for Children," 2008 IEEE International Conference on System of Systems Engineering (SoSE), June 2-4, 2008 ("Shirali-Shahreza")
1009	von Ahn, "Human Computation," CMU-CS-05-193, Carnegie Mellon University School of Computer Science, December 7, 2005 ("vonAhn")
1010	U.S. Patent Application Publication No. 2009/0113294 ("Sanghavi")
1011	U.S. Patent No. 8,601,538 ("Qvarfordt")
1012	U.S. Patent No. 8,510,795 ("Gargi")
1013	U.S. Patent Application Publication No. 2007/0201745 ("Wang")
1014	U.S. Patent Application Publication No. 2007/0250920 ("Lindsay")
1015	Greg Kochanski, Daniel Lopresti, and Chilin Shih, "A Reverse Turing Test Using Speech," Proceedings of the 7th International Conference on Spoken Language Processing, 1357-60, September 16-20, 2002 ("Kochanski")
1016	Institute of Electrical and Electronics Engineers, Inc., <i>CAPTCHA for Children</i> – <i>IEEE Conference Publication</i> , at https://ieeexplore.ieee.org/document/4724188

Exhibit	Description
1017	Yaoyao Zhu, Xiolei Huang, Daniel Lopresti, <i>et al.</i> , “Web-based Multi-observer Segmentation Evaluation Tool,” 21st IEEE International Symposium on Computer- Based Medical Systems, June 17-19, 2008
1018	Sajad Shirali-Shahreza, <i>et al.</i> , “Bibliography of Works Done on CAPTCHA,” 2008 3rd International Conference on Intelligent System and Knowledge Engineering, November 17-19, 2008
1019	Library of Congress, <i>Public Catalog for 2008 IEEE International Conference on System of Systems Engineering (SoSE)</i> , at https://cocatalog.loc.gov/cgi-bin/Pwebrecon.cgi?Search_Arg=2008+IEEE+International+Conference+on+System+of+Systems+Engineering&Search_Code=TALL&PID=V1FL5zSeTrVcFdBaUaFwZkA1ayd0k&SEQ=20200904174316&CNT=25 &HIST=1
1020	Excerpt from Institute of Electrical and Electronics Engineers, Inc., <i>2008 IEEE International Conference on System of Systems Engineering (SoSE)</i> , 343-48 (2008)
1021	Declaration of Mary K. Bolin, Ph.D., with attachments
1022	Declaration of Jessica Benner, Ph.D., with attachment
1023	Declaration of Professor Kawahara Tatsuya, with attachment
1024	Declaration of Gerard P. Grenier, with attachment
1025	<i>Human Differential Intelligence LLC v. Cigna Corporation</i> , No. 6:20-cv-00305-ADA (W.D. Tex.), D.I. 19 (Corrected First Amended Complaint)
1026	<i>Human Differential Intelligence LLC v. The Gap, Inc.</i> , No. 6:20-cv-00307-ADA (W.D. Tex.), D.I. 14 (Corrected First Amended Complaint)
1027	<i>Human Differential Intelligence LLC v. Bed Bath & Beyond, Inc.</i> , No. 6:20-cv-00310-ADA (W.D. Tex.), D.I. 13 (Corrected First Amended Complaint)
1028	<i>Human Differential Intelligence LLC v. CVS Health Corporation</i> , No. 6:20-cv-00311-ADA (W.D. Tex.), D.I. 18 (First Amended Original Complaint)

Exhibit	Description
1029-1039	Reserved
1040	Merriam-Webster, Inc., “Threshold,” <i>Merriam-Webster’s Collegiate Dictionary</i> 1302 (11th ed. 2007)
1041	U.S. Patent Application Publication No. 2009/0319270 (“Gross”)
1042	U.S. Patent No. 8,542,251 (“Gossweiler”)
1043	U.S. Patent Application Publication No. 2009/0320123 (“Yu”)
1044	<i>Human Differential Intelligence LLC v. Cloudflare</i> , No. 1:22-cv-01334 (W.D. Tex.), D.I. 1 (Complaint)
1045	Declaration of Jessica Benner, Ph.D., with attachment (Feb. 17, 2023)
1046	Declaration of Kelley M. Hayes Greenhill, with attachments (Feb. 22, 2023)
1047	<i>Human Differential Intelligence LLC v. Cloudflare</i> , No. 1:22-cv-01334 (W.D. Tex.), D.I. 13 (Order Staying Case) (Jan. 18, 2023),
1048	<i>Human Differential Intelligence LLC v. Cloudflare</i> , No. 1:22-cv-01334 (W.D. Tex.), PACER Docket (Feb. 22, 2023)
1049-1061	Reserved
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 **Petitioner's 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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