

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,

Petitioner,

v.

NETLIST, INC.,

Patent Owner

IPR2023-00847

Patent 10,268,608 B2

PETITIONER'S UPDATED EXHIBIT LIST

EXHIBIT LIST

Exhibit #	Description
1001	U.S. Patent No. 10,268,608
1002	File History of U.S. Patent No. 10,268,608
1003	Declaration of Dr. Robert Wedig
1004	Curriculum Vitae of Dr. Robert Wedig
1005	U.S. Patent Pub. No. US2010/0312956 to Hiraishi
1006	U.S. Patent No. 8,020,022 to Tokuhiro
1007	U.S. Patent Pub. No. 2006/0277355 by Ellsberry
1008	U.S. Patent No. 6,184,701 to Kim
1009	U.S. Patent No. 8,566,516 to Schakel
1010	File History of U.S. Patent No. 9,128,632
1011	File History of U.S. Patent No. 9,563,587
1012	<i>SK hynix Inc. et al. v. Netlist, Inc.</i> , IPR2017-00730, Paper No. 1 (PTAB January 20, 2017) (632 Petition)
1013	<i>SK hynix Inc. et al. v. Netlist, Inc.</i> , IPR2017-00730, Paper No. 1 (PTAB January 20, 2017) (632 Patent Owner Preliminary Response)
1014	<i>SK hynix Inc. et al. v. Netlist, Inc.</i> , IPR2017-00730, Paper No. 8 (PTAB July 21, 2017) (632 Decision Denying Institution)
1015	<i>SK hynix Inc. et al. v. Netlist, Inc.</i> , IPR2018-00362, Paper No. 29 (PTAB June 27, 2019) (907 Final Written Decision)
1016	U.S. Patent Pub. No. 2011/0062999 to Nimaiyar
1017	Declaration of Julie Carlson for JEDEC Standard 21-C

Exhibit #	Description
1018	JEDEC Standard 21-C, DDR SDRAM Registered DIMM Design Specification (January 2002)
1019	Declaration of Julie Carlson for JESD79-3C
1020	JEDEC DDR3 SDRAM Standard, JESD79-3C (April 2008)
1021	Bruce Jacob et al., Memory Systems: Cache, DRAM, Disk (2008) (excerpts)
1022	Harold S. Stone, Microcomputer Interfacing (1982)
1023	Microsoft Computer Dictionary (5th ed. 2002)
1024	U.S. Patent No. 9,263,103 to Giovannini
1025	U.S. App. No. 61/676,883 (provisional application to '632 Patent)
1026	U.S. Patent No. 8,565,033 to Manohararajah
1027	U.S. Patent No. 7,808,849 to Swain
1028	U.S. Patent No. 6,906,555 to Ma
1029	U.S. Patent Pub. No. 2007/0008791 to Butt
1030	U.S. Patent No. 7,036,053 to Zumkehr
1031	U.S. Patent No. 9,824,035
1032	File History of U.S. Patent No. 9,824,035
1033	U.S. Patent No. 5,036,221 to Brucculeri
1034	U.S. Patent No. 9,536,579 to Iijima
1035	<i>Netlist, Inc. v. Micron Technology, Inc. et al.</i> , No. 1:22-cv-00136 (W.D. Tex. filed Apr. 28, 2021)

Exhibit #	Description
1036	Order Transferring Cases to the Austin Division, <i>Netlist, Inc. v. Micron Technology, Inc. et al.</i> , No. 1:22-cv-00136 (W.D. Tex. Feb. 14, 2022)
1037	Joint Claim Construction Statement, <i>Netlist, Inc. v. Micron Technology, Inc. et al.</i> , No. 1:22-cv-00136 (W.D. Tex. Apr. 14, 2022)
1038	Order on Motion to Stay, <i>Netlist, Inc. v. Micron Technology, Inc. et al.</i> , No. 1:22-cv-00136 (W.D. Tex. May 11, 2022)
1039	[intentionally omitted]
1040	Decision Granting Institution of <i>Inter Partes</i> Review, <i>Micron Technology, Inc. et al. v. Netlist, Inc.</i> , IPR2022-00236, Paper 16 (PTAB July 19, 2022) (U.S. Patent No. 9,824,035)
1041	Decision Denying Institution of <i>Inter Partes</i> Review, <i>Micron Technology, Inc. et al. v. Netlist, Inc.</i> , IPR2022-00237, Paper 15 (PTAB July 19, 2022) (U.S. Patent No. 10,268,608)
1042	[intentionally omitted]
1043	[intentionally omitted]
1044	Complaint, <i>Netlist, Inc. v. Samsung Electronics Co., Ltd. et al.</i> , No. 2:21-cv-00463 (E.D. Tex. filed Dec. 20, 2021) (asserting U.S. Patent No. 10,860,506)
1045	First Amended Complaint, <i>Netlist, Inc. v. Samsung Electronics Co., Ltd. et al.</i> , No. 2:21-cv-00463 (E.D. Tex. May 3, 2022)
1046	U.S. Patent No. 10,860,506
1047	Decision Granting Institution of <i>Inter Partes</i> Review, <i>Samsung Electronics Co., Ltd. v. Netlist, Inc.</i> , IPR2022-00711, Paper 14 (PTAB Oct. 21, 2022) (U.S. Patent No. 10,860,506)

Exhibit #	Description
1048	Joint 4-3 Claim Construction and Prehearing Statement, <i>Netlist, Inc. v. Samsung Electronics Co., Ltd. et al.</i> , No. 2:21-cv-00463 (E.D. Tex. Aug. 19, 2022 and Aug. 23, 2022)
1049	Joint Claim Construction Chart Pursuant to P.R. 4-5(d), <i>Netlist, Inc. v. Samsung Electronics Co., Ltd. et al.</i> , No. 2:21-cv-00463 (E.D. Tex. Sept. 30, 2022)
1050	Claim Construction Order, <i>Netlist, Inc. v. Samsung Electronics Co., Ltd. et al.</i> , No. 2:21-cv-00463 (E.D. Tex. Dec. 14, 2022)
1051	Defendants' Objections to Claim Construction Memorandum Order, <i>Netlist, Inc. v. Samsung Electronics Co., Ltd. et al.</i> , No. 2:21-cv-00463 (E.D. Tex. Dec. 29, 2022)
1052	File History of U.S. Patent No. 10,860,506
1053	Complaint, <i>Netlist, Inc. v. Micron Technology, Inc. et al.</i> , No. 2:22-cv-00203 (E.D. Tex. filed June 10, 2022) (asserting U.S. Patent No. 10,860,506)
1054	Complaint, <i>Netlist, Inc. v. Samsung Electronics Co., Ltd. et al.</i> , No. 2:22-cv-00293 (E.D. Tex. filed Aug. 1, 2022)
1055	First Amended Complaint, <i>Netlist, Inc. v. Samsung Electronics Co., Ltd. et al.</i> , No. 2:22-cv-00293 (E.D. Tex. Aug. 15, 2022)
1056	Netlist's motion to amend its complaint to assert U.S. Patent No. 10,268,608, <i>Netlist, Inc. v. Samsung Electronics Co., Ltd. et al.</i> , No. 2:22-cv-00293 (E.D. Tex. Jan. 20, 2023)
1057	Netlist's proposed Second Amended Complaint asserting U.S. Patent No. 10,268,608 in <i>Netlist, Inc. v. Samsung Electronics Co., Ltd. et al.</i> , No. 2:22-cv-00293 (E.D. Tex. Jan. 20, 2023)
1058	JEDEC DDR4DB02 Data Buffer Definition Standard, JESD82-32A (Aug. 2019)
1059	JEDEC Standard, FBDIMM: Advanced Memory Buffer (AMB), JESD82-20 (March 2007) (Exhibit 1053 in IPR2022-00711)

Exhibit #	Description
1060	[intentionally omitted]
1061	[intentionally omitted]
1062	[intentionally omitted]
1063	<i>Interim Procedure for Discretionary Denials in AIA Post-Grant Proceedings with Parallel District Court Litigation</i> (June 21, 2022)
1064	Federal Court Management Statistics (June 30, 2022), available at < https://www.uscourts.gov/statistics/table/na/federal-court-management-statistics/2022/06/30-2 >
1065	Email from counsel for Samsung to counsel for Patent Owner re: stipulation not to pursue certain invalidity defenses if an IPR proceeding is instituted
1066	Final Written Decision, <i>Micron Technology, Inc. et al. v. Netlist, Inc.</i> , IPR2022-00236, Paper 34 (PTAB June 20, 2023) (U.S. Patent No. 9,824,035)
1067	Decision Granting Petitioner's Request on Rehearing of Final Written Decision, <i>Micron Technology, Inc. et al. v. Netlist, Inc.</i> , IPR2022-00236, Paper 36 (PTAB August 16, 2023) (U.S. Patent No. 9,824,035)
1068	Final Written Decision, <i>Samsung Electronics Co., Ltd. et al. v. Netlist, Inc.</i> , IPR2022-00711, Paper 42 (PTAB Oct. 17, 2023) (U.S. Patent No. 10,860,506)
1069	S4 and S5 read/write leveling in Hiraishi (EX1005)
1070	S4 read leveling in Hiraishi (EX1005)
1071	S4 write leveling in Hiraishi (EX1005)
1072	Errata to the deposition of Robert Wedig on March 12, 2024 (EX2012)

Exhibit #	Description
1073	Errata to the deposition of Robert Wedig on January 19, 2023, in IPR2022-00711 (EX2016)
1074	Transcript of Deposition of Dr. William Mangione-Smith (June 4, 2024)
1075	Transcript of Deposition of Dr. William Mangione-Smith on May 4, 2023 (Exhibit 1046 in IPR2022-00711)
1076	Declaration of Dr. William Mangione-Smith on January 31, 2023 (Exhibit 2006 in IPR2022-00711)
1077	Netlist's Technology Tutorial (Exhibit 1047 in IPR2022-00711)
1078	Figure 2C of the '608 Patent showing horizontal flight time delays for control and clock signals (EX1001)
1079	Figure 7 in <u>Hiraishi</u> showing horizontal flight time delays for control and clock signals (EX1005)
1080	Figure 15–16 in the '608 Patent (EX1001)
1081	Figure 12 in <u>Hiraishi</u> after S4 write leveling (EX1005)
1082	Figure 15 in <u>Hiraishi</u> and vertical flight time delays for read data (EX1005)
1083	Figure 12 in <u>Hiraishi</u> and vertical flight time delays for write data (EX1005)
1084	U.S. Patent No. 7,215,584 to Butt et al. (incorporated by reference in [0047] of Exhibit 1029)
1085	Presentation on read leveling and write leveling for DDR3 memory modules (2008)
1086	Netlist's demonstratives for oral argument (Exhibit 2013 in IPR2022-00711)
1087	Dictionary definition for “path”

Exhibit #	Description
1088	Inter Partes Review Certificate for U.S. Patent No. 9,824,035 (cancelling claims 1, 10-13, 21, 22)
1089 [NEW]	Petitioner's Demonstratives for Oral Argument on September 5, 2024

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 30th day of August, 2024, **Petitioner's Updated Exhibit List** and **Exhibit 1089** were served by email on the following counsel for Patent Owner:

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