

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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MAHLE BEHR CHARLESTON INC.,  
Petitioner,

v.

FRANK AMIDIO CATALANO,  
Patent Owner,

Patent No. RE47,494 to Catalano

Issue Date: July 9, 2019

Title: ELECTROLYSIS PREVENTION DEVICE AND METHOD OF USE

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*Inter Partes* Review No.: IPR2023-00861

**PETITIONER'S UPDATED EXHIBIT LIST**

Petitioner's Updated Exhibit List for *Inter Partes*  
Review of U.S. Patent No. RE47,494

Pursuant to 37 C.F.R. § 42.63(e), MAHLE Behr Charleston Inc. ("Petitioner")

respectfully submits the following current exhibit list:

**TABLE OF EXHIBITS**

| <b>Exhibit No.</b> | <b>Exhibit Name</b>                                                                                                                                                                     |
|--------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1001               | U.S. Patent No. RE47,494 ("the '494 Patent")                                                                                                                                            |
| 1002               | Complaint filed in <i>Electrolysis Prevention Solutions LLC v. Daimler Trucks North America LLC</i> , 3:21-cv-171 (W.D.N.C.) (Apr. 19, 2021)                                            |
| 1003               | Plaintiff's Second Amended Infringement Contentions served in <i>Electrolysis Prevention Solutions LLC v. Daimler Trucks North America LLC</i> , 3:21-cv-171 (W.D.N.C.) (Nov. 22, 2022) |
| 1004               | Declaration of Dr. Dana J. Medlin                                                                                                                                                       |
| 1005               | Japanese Patent Application Publication No. S55-68595 to Tomosada ("Tomosada") and Certified Translation Thereof                                                                        |
| 1006               | Japanese Patent Application Publication No. A-6-272069 to Hanazaki, <i>et al.</i> ("Hanazaki-069") and Certified Translation Thereof                                                    |
| 1007               | Japanese Patent Application Publication No. H1-217196 to Hanazaki, <i>et al.</i> ("Hanazaki-196") and Certified Translation Thereof                                                     |
| 1008               | International Patent Application Publication No. 03/100337 to Godefroy, <i>et al.</i> ("Godefroy") and Certified Translation Thereof                                                    |
| 1009               | Prosecution history of U.S. Patent No. 8,236,145 ("the '145 Patent")                                                                                                                    |

Petitioner's Updated Exhibit List for *Inter Partes*  
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| Exhibit No. | Exhibit Name                                                                                                                                   |
|-------------|------------------------------------------------------------------------------------------------------------------------------------------------|
| 1010        | Prosecution history of the '494 Patent                                                                                                         |
| 1011        | U.S. Patent No. 5,649,591 to Green ("Green")                                                                                                   |
| 1012        | U.S. Patent No. 1,514,903 to Gush ("Gush")                                                                                                     |
| 1013        | U.S. Patent No. 6,109,987 to Watanabe, <i>et al.</i> ("Watanabe")                                                                              |
| 1014        | Chinese Patent No. 1225998A to Guo ("Guo")                                                                                                     |
| 1015        | Ford Care and Home Repair, How to Enjoy Your Ford Car, <i>Radiator Repairs</i> , 1922 Ed. to Murray Fahnestock ("Fahnestock")                  |
| 1016        | Markman Order filed in <i>Electrolysis Prevention Solutions LLC v. Daimler Trucks North America LLC</i> , 3:21-cv-171 (W.D.N.C.) (May 4, 2022) |
| 1017        | U.S. Patent No. 4,776,392 to Loyd ("Loyd")                                                                                                     |
| 1018        | <b>SEALED</b> – 10/3/22 Letter from DTNA to MAHLE Behr Charleston Inc. – <b>CONFIDENTIAL – ATTORNEYS' EYES ONLY</b>                            |
| 1019        | <b>SEALED</b> – DTNA Purchase Order Terms and Conditions– <b>CONFIDENTIAL – ATTORNEYS' EYES ONLY</b>                                           |
| 1020        | <b>SEALED</b> – 4/17/23 Letter from MAHLE-Behr Charleston Inc. to DTNA– <b>CONFIDENTIAL – ATTORNEYS' EYES ONLY</b>                             |
| 1021        | 11/17/22 EPS's Rule 45 Document Subpoena to MAHLE Behr                                                                                         |
| 1022        | Proposed Protective Order                                                                                                                      |
| 1023        | Redline of Proposed Protective Order                                                                                                           |

Petitioner's Updated Exhibit List for *Inter Partes*  
Review of U.S. Patent No. RE47,494

Respectfully submitted,

Dated: June 20, 2023

By: / Jeanne M. Gills /

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Updated Exhibit List was served on June 20, 2023 to counsel of record for Patent Owner:

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