

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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**NETFLIX, INC.,**

Petitioner

v.

**VL COLLECTIVE IP LLC,**

Patent Owner

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IPR2023-00891  
U.S. Patent 8,605,794

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**PATENT OWNER'S UPDATED EXHIBIT LIST**

**PATENT OWNER'S EXHIBIT LIST**

| <b>Exhibit</b> | <b>Description</b>                                                                                                                                                                                                                                                       |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2001           | Joint Claim Construction Statement in <i>VideoLabs, Inc. et al. v. Amazon.com, Inc. et al.</i> , No. 22-cv-00079-ADA-DTG                                                                                                                                                 |
| 2002           | VideoLabs' Answering Claim Construction Brief, <i>Starz Entertainment, LLC et al. v. VL Collective IP, LLC et al.</i> , No. 21 -cv-1448-JLH (excerpted)                                                                                                                  |
| 2003           | Markman Hearing Transcript, <i>Starz Entertainment, LLC et al. v. VL Collective IP, LLC et al.</i> , No. 21-cv-1448-JLH                                                                                                                                                  |
| 2004           | Declaration of Jaime F. Cardenas-Navia in Support of Motion for Admission <i>Pro Hac Vice</i>                                                                                                                                                                            |
| 2005           | Discovery Requests from Netflix                                                                                                                                                                                                                                          |
| 2006           | Unified Website FAQ, <a href="https://www.unifiedpatents.com/faq">https://www.unifiedpatents.com/faq</a>                                                                                                                                                                 |
| 2007           | Unified LinkedIn Post, <a href="https://www.linkedin.com/posts/sambwani_videolabs-794-video-codec-patent-likely-activity-7011105082129743872-66mK">https://www.linkedin.com/posts/sambwani_videolabs-794-video-codec-patent-likely-activity-7011105082129743872-66mK</a> |
| 2008           | Unified Website Zones, <a href="https://www.unifiedpatents.com/sep">https://www.unifiedpatents.com/sep</a>                                                                                                                                                               |
| 2009           | Unified Website Seeking Prior Art, <a href="https://www.unifiedpatents.com/insights/2023/10/30/8000-for-videolabs-digital-content-patents-prior-art">https://www.unifiedpatents.com/insights/2023/10/30/8000-for-videolabs-digital-content-patents-prior-art</a>         |
| 2010           | Unified's Newsletter Regarding Found Prior Art, <a href="https://www.unifiedpatents.com/insights/2024/3/1/videolabsdigital-content-patents-prior-art-found">https://www.unifiedpatents.com/insights/2024/3/1/videolabsdigital-content-patents-prior-art-found</a>        |
| 2011           | Declaration of Dr. Michael T. Goodrich                                                                                                                                                                                                                                   |
| 2012           | Deposition Transcript of Dr. Benjamin Bederson                                                                                                                                                                                                                           |
| 2013           | U.S. Patent No. 7,428,696 to Shin                                                                                                                                                                                                                                        |
| 2014           | U.S. Patent No. 5,598,352 to Rosenau et al.                                                                                                                                                                                                                              |
| 2015           | Dr. Immanuel Freedman Deposition Transcript from <i>Unified Patents, LLC v. VL Collective IP, LLC</i> , IPR2022-01086                                                                                                                                                    |
| 2016           | Jim Heckroth, <i>A Tutorial on MIDI and Wavetable Music Synthesis</i> , Cirrus Logic, Inc., AN27REV4, 1-24, February 1998                                                                                                                                                |
| 2017           | Jim Heckroth, <i>Tutorial on MIDI and Music Synthesis</i> , The MIDI Manufacturers Association, April 2006                                                                                                                                                               |
| 2018           | Music Theory ( <a href="https://www.musictheory.net/lessons/11#:~:text=The%20length%20of%20time%20that,duration%20of%20a%20whole%20note.">https://www.musictheory.net/lessons/11#:~:text=The%20length%20of%20time%20that,duration%20of%20a%20whole%20note.</a> ).        |

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|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2019 | The MIDI Manufacturers Association, Standard MIDI Files 1.0, February 1996.                                                                                                                                                                                                          |
| 2020 | Netflix Responses To Interrogatories                                                                                                                                                                                                                                                 |
| 2021 | Main Agreement Between Unified and Netflix                                                                                                                                                                                                                                           |
| 2022 | Netflix Subscription Form to Video Codec Zone                                                                                                                                                                                                                                        |
| 2023 | Unified IPR Data                                                                                                                                                                                                                                                                     |
| 2024 | Declaration of Naveed S Hasan                                                                                                                                                                                                                                                        |
| 2025 | Unified Communication With Netflix June 8, 2022                                                                                                                                                                                                                                      |
| 2026 | Unified Communication With Netflix December 20, 2022                                                                                                                                                                                                                                 |
| 2027 | Unified Communication With Netflix December 21, 2022                                                                                                                                                                                                                                 |
| 2028 | Unified Communication With Netflix December 22, 2022                                                                                                                                                                                                                                 |
| 2029 | Unified Communication With Netflix May 8, 2023                                                                                                                                                                                                                                       |
| 2030 | Unified Communication With Netflix December 19, 2023                                                                                                                                                                                                                                 |
| 2031 | Unified Communication With Netflix December 19, 2023                                                                                                                                                                                                                                 |
| 2032 | Unified Communication With Netflix December 21, 2023                                                                                                                                                                                                                                 |
| 2033 | Unified Communication With Netflix January 15, 2024                                                                                                                                                                                                                                  |
| 2034 | Unified News Article About Ideahub's Video Codec Patent (available at: <a href="https://www.unifiedpatents.com/insights/2024/2/5/ideahub-sepvideo-encoding-patent-held-invalid">https://www.unifiedpatents.com/insights/2024/2/5/ideahub-sepvideo-encoding-patent-held-invalid</a> ) |
| 2035 | Patent Owner's Motion To Terminate (Redacted)                                                                                                                                                                                                                                        |
| 2036 | Patent Owner's Reply In Support Of Patent Owner's Motion To Terminate (Redacted)                                                                                                                                                                                                     |
| 2037 | Netflix Responses To Interrogatories (Redacted)                                                                                                                                                                                                                                      |
| 2038 | Main Agreement Between Unified and Netflix (Redacted)                                                                                                                                                                                                                                |
| 2039 | Netflix Subscription Form to Video Codec Zone (Redacted)                                                                                                                                                                                                                             |
| 2040 | Dictionary.com Definition Of "Based" (available at: <a href="https://www.dictionary.com/browse/based#american-based-adjective">https://www.dictionary.com/browse/based#american-based-adjective</a> )                                                                                |
| 2041 | Dictionary.com Definition Of "Segment" (available at: <a href="https://www.dictionary.com/browse/segment">https://www.dictionary.com/browse/segment</a> )                                                                                                                            |
| 2042 | Merriam Webster's Definition of "Segment" (available at: <a href="https://www.merriam-webster.com/dictionary/segment">https://www.merriam-webster.com/dictionary/segment</a> )                                                                                                       |
| 2043 | Patent Owner's Demonstratives                                                                                                                                                                                                                                                        |
| 2044 | VL Collective IP, LLC's Opening Brief In <i>VL Collective IP, LLC v. Unified Patents, LLC</i> , 2024-1890 (Fed. Cir.)                                                                                                                                                                |

Case IPR2023-00891

Patent No. 8,605,794

Dated: October 14, 2024

By: /Christine E. Lehman/  
Christine E. Lehman  
PTO Reg. No. 38,535  
**Counsel for Patent Owner**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing **PATENT OWNER'S UPDATED EXHIBIT LIST** was served on, via electronic mail, as agreed to by counsel, upon the following counsel for Petitioner:

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