UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNITED SERVICES AUTOMOBILE ASSOCIATION,
Petitioner,

v.

AUTO TELEMATICS LTD.,
Patent Owner.

Case IPR2023-00912
Patent 9,311,271

PETITIONER'S UPDATED EXHIBIT LIST

UPDATED EXHIBIT LIST

USAA-1001	U.S. Patent No. 9,311,271 to Wright ("the '271 Patent")
USAA-1002	Excerpts from the Prosecution History of the '271 Patent ("the Prosecution History")
USAA-1003	Declaration and Curriculum Vitae of Dr. William Michalson
USAA-1004	Original Complaint for Patent Infringement in *Auto Telematics Ltd. v. United Services Automobile Association*, 6:22-cv-00474 (W.D. Tex. May 11, 2022)
USAA-1005	U.S. Pat. Appl. Pub. No. 2011/0307188 ("Peng")
USAA-1006	U.S. Pat. Appl. Pub. No. 2010/0131691 ("Chatterjee")
USAA-1007	U.S. Patent No. 6,073,004 to Balachandran ("Balachandran")
USAA-1008	Thompson et. al, "Using Smartphones to Detect Car Accidents and Provide Situational Awareness to Emergency Responders," Mobilware 2010, LNICST 48, pp. 29–42, 2010 ("Thompson2010")
USAA-1009	International Publication No. WO 2007/114716 ("Willis")
USAA-1010	U.S. Patent Application Publication No. 2008/0255888 ("Berkobin")
USAA-1011	Cheng et. al, "An Android System Design and Implementation for Telematics Services," 2010 IEEE International Conference on Intelligent Computing and Intelligent Systems. Vol. 2. IEEE, 2010 ("Cheng2010")
USAA-1012	U.S. Patent No. 7,821,421 to Tamir et. al ("Tamir")
USAA-1013	U.S. Pat. No. 8,682,399 to Rabu ("Rabu")

USAA-1014	U.S. Pat. App. Pub. No. 2010/0208070 to Haynes ("Haynes")
USAA-1015	U.S. Pat. App. Pub. No. 2002/0105423 to Rast ("Rast")
USAA-1016	U.S. Pat. App. Pub. No. 2009/0192705 to Golding ("Golding")
USAA-1017	U.S. Pat. No. 7,765,058 to Doering ("Doering")
USAA-1018	European Pat. Pub. No. EP1614585A1 to Christian ("Christian")
USAA-1019	U.S. Pat. No. 5,906,393 to Mazur ("Mazur")
USAA-1020	Richard C. Hunt, "Emerging Communication Technologies in Emergency Medical Services," Prehospital Emergency Care, 2002; 6:1, 131-136 ("Hunt2002")
USAA-1021	Kanianthra, Joseph, Arthur Carter, and Gerard Preziotti. "Enhancing post-crash vehicle safety through an automatic collision notification system," No. 2001-06-0085. SAE Technical Paper, 2001 ("Kanianthra2001")
USAA-1022	Megalingam R.K. et al., "Wireless vehicular accident detection and reporting system." 2010 International Conference on Mechanical and Electrical Technology (ICMET 2010) ("Megalingam2010")
USAA-1023	Farris, P. et al., "General Motors OnStar." Darden Case No. UVA-M-0659 (2002) ("Farris2002")
USAA-1024	European Pat. App. Pub. No. EP 1,914,691 to Katayama et al. ("Katayama")
USAA-1025	U.S. Pat. App. Pub. No. 2012/0074770 to Lee ("Lee")
USAA-1026	International Publication No. WO 2010/042545 to Curry et. al ("Curry")

USAA-1027	Linda Null and Julia Lobur, Excerpts from The Essentials of Computer Organization and Architecture (2003) ("Null")
USAA-1028	U.S. Pat. Publication No. 2009/0005975 to Forstall et al. ("Forstall")
USAA-1029	Langle, Lonnie, and Ram Dantu, "Are you a safe driver" 2009 International Conference on Computational Science and Engineering. Vol. 2. IEEE, 2009 ("Langle")
USAA-1030	U.S. Pat. Publication No. 2006/0053038 to Warren et al. ("Warren")
USAA-1031	U.S. Pat. Publication No. 2007/0027585 to Wulff ("Wulff")
USAA-1032	Mohan, Prashanth et al., "Nericell: Rich Monitoring of Road and Traffic Conditions using Mobile Smartphones," Proceedings of the 6th ACM conference on Embedded network sensor systems, 2008. 323-336 ("Mohan")
USAA-1033	U.S. Pat. No. 5,274,560 to LaRue ("LaRue")
USAA-1034	Declaration of Nathaniel E. Frank-White re Exhibits USAA-1077 (Ex. A) and USAA-1078 (Ex. B)
USAA-1035	RESERVED
USAA-1036	Declaration of Nathaniel E. Frank-White re Exhibits USAA-1079 (Ex. A), USAA-1080 (Ex. B), and USAA-1081 (Ex. C)
USAA-1037-1040	RESERVED
USAA-1041	Zhao, Yilin, "Telematics: safe and fun driving," IEEE Intelligent systems 17.1 (2002): 10-14 ("Zhao2002A")
USAA-1042	Del Rosso, Christian, "The method, the tools and rationales for

	assessing dynamic memory efficiency in embedded real-time systems in practice," 2006 International Conference on Software Engineering Advances (ICSEA'06), IEEE, 2006 ("Christian2006")
USAA-1043	Wakihara, Masataka, "Recent developments in lithium ion batteries," Materials Science and Engineering: R: Reports 33.4 (2001): 109-134 ("Wakihara")
USAA-1044	Toledo, Tomer, et. al, "In-vehicle data recorders for monitoring and feedback on drivers' behavior," Transportation Research Part C: Emerging Technologies 16.3 (2008): 320-331 ("Toledo")
USAA-1045	International Publication No. WO 2010/062899 ("Callopy")
USAA-1046	Zhao, Yilin, "Vehicle Location and Navigation Systems," Artech House, Boston (1997) ("Zhao1997")
USAA-1047	Conover, Gerald D. "ITS Technology in Automotive—Who's on First?" SAE International (2006): 1-11 ("Conover2006")
USAA-1048	Skog, Isaac, et. al, "A versatile PC-based platform for inertial navigation," Proceedings of the 7th Nordic Signal Processing Symposium-NORSIG 2006. IEEE, 2006 ("Skog2006")
USAA-1049	Work, D. B. & Bayen, A.M., "Impacts of the mobile internet on transportation cyberphysical systems: traffic monitoring using smartphones," National Workshop for Research on High-Confidence Transportation Cyber-Physical Systems: Automotive, Aviation, & Rail, 2008 ("Work2008")
USAA-1050	Flinchbaugh, B., "Smart Camera Systems Technology Roadmap" Real-Time Vision for Human-Computer Interaction (2005), 285-297 ("Flinchbaugh2005")
USAA-1051	LeBlanc, David J., "Road departure crash warning system field operational test: methodology and results," Vol. 1: Technical Report, University of Michigan, Ann Arbor, Transportation

Research Institute, 2006 ("LeBlanc2006").

USAA-1052 Reddy, Sasank et al., "Determining transportation mode on mobile phones," 2008 12th IEEE international symposium on wearable computers. IEEE, 2008 ("Reddy2008").

USAA-1053 Zhao, Yilin, "Standardization of mobile phone positioning for 3G systems," IEEE Communications magazine 40.7 (2002): 108-116 ("Zhao2002B")

USAA-1054 Strömmer, Esko et al., "Ultra-low Power Sensors with Near Field Communication for Mobile Applications," Wireless Sensor and Actor Networks WSAN 2007: IFIP International Federation for Information Processing. Springer, Boston, MA, 2007 ("Strömmer2007")

USAA-1055 Schott, Christian, et al., "CMOS single-chip electronic compass with microcontroller," IEEE Journal of Solid-State Circuits 42.12 (2007): 2923-2933 ("Schott2007")

USAA-1056 Liutkauskas, V. et al., "Location based services," Elektronika ir elektrotechnika 52.3 (2004). 35-40. ("Liutkauskas2004")

USAA-1057 Ealey, Lance & Luis Troyano-Bermúdez, "Are automobiles the next commodity?" The McKinsey Quarterly 4 (1996): 62-75 ("Ealey1996")

USAA-1058 Zhao, Yilin, "Efficient and reliable data transmission for cellular-and-GPS-based mayday systems," Proceedings of Conference on Intelligent Transportation Systems, IEEE, 1997 ("Zhao1997B")

USAA-1059 Young, Richard A., "Association Between Embedded Cellular Phone Calls and Vehicle Crashes Involving Airbag Deployment," Proceedings of the First International Driving Symposium on Human Factors in Driver Assessment, Training and Vehicle Design, Driving Assessment Conference 1-2001. 390-400. ("Young2001")

USAA-1060	De Fabritiis, Corrado et al., "Traffic estimation and prediction based on real time floating car data," 2008 11th international IEEE conference on intelligent transportation systems, IEEE, 2008 ("DeFabritiis2008")
USAA-1061	Schäfer, Ralf-Peter, et al., "A traffic information system by means of real-time floating-car data" (2002) ("Schäfer2002")
USAA-1062	Kerner, B. S., et al., "Traffic state detection with floating car data in road networks," Proceedings of the 8th International IEEE Conference on Intelligent Transportation Systems, 2005, ("Kerner2005")
USAA-1063	Leduc, Guillaume, "Road traffic data: Collection methods and applications," Working Papers on Energy, Transport and Climate Change 1.55 (2008): 1-55 ("Leduc2008")
USAA-1064	Troncoso, Carmela, et al, "Pripayd: privacy friendly pay-as-you-drive insurance," IEEE Transactions on Dependable and Secure Computing, Vol. 8, No. 5, October 2011 ("Troncoso2011")
USAA-1065	Memorandum, Interim Procedure for Discretionary Denials in AIA Post-Grant Proceedings with Parallel District Court Litigation (USPTO June 21, 2022) ("Director's Guidance")
USAA-1066	Order Granting Motion for Entry of Scheduling Order in *Auto Telematics Ltd. v. United Services Automobile Association*, 6:22-cv-00474 (W.D. Tex. September 16, 2022)
USAA-1067	U.S. District Court Statistics (June 30, 2022), *available at* https://www.uscourts.gov/sites/default/files/fcms_na_distprofile0630.2022_0.pdf
USAA-1068	USAA's Opening Claim Construction Brief in *Auto Telematics Ltd. v. United Services Automobile Association*, 6:22-cv-00474 (W.D. Tex. December 19, 2022)
USAA-1069	Plaintiff's Claim Construction Response Brief in *Auto*

	Telematics Ltd. v. United Services Automobile Association, 6:22-cv-00474 (W.D. Tex. January 12, 2023)
USAA-1070	USAA's Reply Claim Construction Brief in *Auto Telematics Ltd. v. United Services Automobile Association*, 6:22-cv-00474 (W.D. Tex. January 25, 2023)
USAA-1071	Plaintiff's Claim Construction Sur-Reply Brief in *Auto Telematics Ltd. v. United Services Automobile Association*, 6:22-cv-00474 (W.D. Tex. February 6, 2023)
USAA-1072	Joint Claim Construction Statement in *Auto Telematics Ltd. v. United Services Automobile Association*, 6:22-cv-00474 (W.D. Tex. February 7, 2023)
USAA-1073	Claim Construction Order in *Auto Telematics Ltd. v. United Services Automobile Association*, 6:22-cv-00474 (W.D. Tex. February 16, 2023)
USAA-1074	Stipulation by USAA
USAA-1075	Plaintiff Auto Telematics Ltd.'s Preliminary Infringement Contentions and Identification of Document Production Accompanying Disclosure in *Auto Telematics Ltd. v. United Services Automobile Association*, 6:22-cv-00474 (W.D. Tex. August 26, 2022)
USAA-1076	United Services Automobile Association's Preliminary Invalidity Contentions in in *Auto Telematics Ltd. v. United Services Automobile Association*, 6:22-cv-00474 (W.D. Tex. October 21, 2022)
USAA-1077	Internet Archive of Waze User Manual
USAA-1078	Internet Archive of iPhone User Guide
USAA-1079	Internet Archive of iPhone 3G Technical Specification
USAA-1080	Internet Archive of iPhone User Guide for iPhone and iPhone

	3G
USAA-1081	Internet Archive of Instruction Sheet for iPhone 3G
USAA-1082-1499	RESERVED
USAA-1500	International Publication No. WO 2012/036809 ("Bourque")
USAA-1501	U.S. Pat. Appl. Pub. No. 2012/0071151 ("Abramson et al.")
USAA-1502	U.S. Pat. Appl. Pub. No. 2006/0145039 ("Shawver")
USAA-1503	Priority Document GB 1021292.6 filed Dec. 15, 2010 ("P1")
USAA-1504	Priority Document GB 1101259.8 filed Jan. 25, 2011 ("P2")
USAA-1505	Priority Document GB 1109759.9 filed Jun. 10, 2011 ("P3")
USAA-1506	Priority Document GB 1118777.0 filed Oct. 31, 2011 ("P4")
USAA-1507	Balasubramanian, et al. "Energy consumption in mobile phones: a measurement study and implications for network applications." Proceedings of the 9th ACM SIGCOMM Conference on Internet Measurement. 2009. ("Balasubramanian")
USAA-1508	Carroll, et al. "An analysis of power consumption in a smartphone." USENIX annual technical conference. Vol. 14. 2010 ("Carroll")
USAA-1509	Miyaji, et al. "Analysis of driver behavior based on traffic incidents for driver monitor systems." 2008 IEEE Intelligent Vehicles Symposium. IEEE ("Miyaji")
USAA-1510	U.S. Patent No. 7,505,784 to Barbera ("Barbera")

USAA-1511	Mitrovic, "Reliable method for driving events recognition." IEEE transactions on intelligent transportation systems 6.2 (2005): 198-205 ("Mitrovic")
USAA-1512	Boonmee, et al., "Portable reckless driving detection system." 2009 6th International Conference on Electrical Engineering/Electronics, Computer, Telecommunications and Information Technology. Vol. 1. IEEE, 2009 ("Boonmee")
USAA-1513	Singleton, et al., "Automobile event data recorder forensics," Advances in Digital Forensics IV 4. Springer US, 2008 ("Singleton")
USAA-1514	Correia, et al, "Utilizing data from automotive event data recorders," Proceedings of the Canadian Multidisciplinary Road Safety Conference XII, London Ontario, 2001 ("Correia")
USAA-1515	Flowers, et al, "Prediction of Accident Likelihood Using Poisson Regression," Traffic Accident Research and Evaluation Program, Texas Transportation Institute, The Texas A&M University System, 1980 ("Flowers")
USAA-1516	U.S. Pat. Appl. Pub. No. 2014/0114696 ("Amigo")
USAA-1517	U.S. Pub. No. 2010/0131307 ("Collopy")
USAA-1518	U.S. Pub. No. 2011/0077028 ("Wilkes")
USAA-1519	Stipulation by USAA and Noblr Reciprocal Exchange
USAA-1520	Transcript of call with Board and parties held November 1, 2023

Respectfully submitted,

Dated November 2, 2023

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CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e), the undersigned certifies that on November 2, 2023, a complete and entire copy of this Petitioner's Updated Exhibit List and Exhibit 1520 were provided by email, to the Patent Owner, by serving the correspondence addresses of record as follows:

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