

Filed: September 13, 2024

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS,

PETITIONER,

V.

GENERAL ACCESS SOLUTIONS, LTD.,

PATENT OWNER.

Case No. IPR2023-00978¹

U.S. Patent No. 7,230,931

PATENT OWNER'S UPDATED EXHIBIT LIST

¹ The Board joined Ericsson Inc. and Nokia of America Corporation as petitioners in this proceeding in IPR2024-00392 and IPR2024-00461, respectively.

PATENT OWNER'S UPDATED EXHIBIT LIST

Patent Owner General Access Solutions, Ltd. hereby submits its updated exhibit list to accompany the submission of Exhibit 2033:

EXHIBIT	DESCRIPTION
2001.	Nosson D. Knobloch biography.
2002.	Declaration of Nosson D. Knobloch in Support of Patent Owner's Motion for <i>Pro Hac Vice</i> Admission of Nosson D. Knobloch Under 37 C.F.R. § 42.10(c).
2003.	Michael J. Valaik biography.
2004.	Declaration of Michael J. Valaik in Support of Patent Owner's Motion for <i>Pro Hac Vice</i> Admission of Michael J. Valaik Under 37 C.F.R. § 42.10(c).
2005.	Ericsson July 16, 2021 Press Release: Ericsson and Verizon ink landmark multi-year \$8.3 Billion 5G deal.
2006.	<i>Samsung wins \$6.6 billion Verizon contract for 5G network.</i>
2007.	Samsung Blog, October 22, 2019: <i>Persistence pays off for Samsung Networks in becoming a major 5G radio access network vendor.</i>
2008.	Order Granting Motion for Leave to Intervene [46], <i>General Access Solutions, Ltd. v. Cellco Partnership D/B/A Verizon Wireless, et al.</i> , Case No. 2:22-cv-00394-JRG (E.D. Tex. Feb. 22, 2023).
2009.	Excerpt of Defendants' Invalidity Contentions, <i>General Access Solutions, Ltd. v. Cellco Partnership D/B/A Verizon Wireless, et al.</i> , Case No. 2:22-cv-00394-JRG.
2010.	Excerpt of Plaintiff's Complaint for Patent Infringement [1], <i>General Access Solutions, Ltd. v. Sprint Corp., Virgin Mobile USA, L.P. and Boost Mobile LLC</i> , Case No. 2:16-cv-00465-RWS (E.D. Tex. May 2, 2016).
2011.	<i>Sprint, Ericsson tout field tests for 2.5 GHz Massive MIMO</i> , September 12, 2017.
2012.	<i>Sprint tests Massive MIMO with Samsung in South Korea</i> , June 20, 2017.

EXHIBIT	DESCRIPTION
2013.	White-Paper - Massive MIMO Comes of Age
2014.	Defendants Sprint Spectrum L.P., Boost Mobile LLC, and Virgin Mobile USA, L.P.'s Initial Disclosures, <i>General Access Solutions, Ltd. v. Sprint Corp., Virgin Mobile USA, L.P. and Boost Mobile LLC</i> , Case No. 2:16-cv-00465-RWS (E.D. Tex. Dec. 6, 2016).
2015.	Email from Nosson Knobloch to Verizon regarding IPR Discovery, dated August 17, 2023.
2016.	Email from Justin Oliver to Nosson Knobloch regarding IPR Discovery, dated August 17, 2023.
2017.	Email from Nosson Knobloch to Jeff Becker and Melissa Muenks regarding Ericsson-Verizon Supply Agreements, dated August 22, 2023.
2018.	Cisco Visual Networking Index: Global Mobile Data Traffic Forecast Update, 2017-2022
2019.	[Corrected] Defendants' Patent Local Rule 4-2 Exchange of Preliminary Proposed Claim Constructions and Extrinsic Evidence, <i>General Access Solutions, Ltd. v. Cellco Partnership D/B/A Verizon Wireless, et al.</i> , Case No. 2:22-cv-00394-JRG (E.D. Tex. Aug. 22, 2023)
2020.	Expert Declaration of James A. Proctor Jr. for <i>Inter Partes</i> Review of U.S. Patent No. 7,320,931, <i>Sprint Spectrum, L.P. v. General Access Solutions, Ltd.</i> , <i>Inter Partes</i> Review Case No. 2017-01889 (PTAB July 28, 2017)
2021.	<i>Fan Beam</i> , Britannica.com
2022.	Excerpt of <i>Wireless Communications: Principles & Practice</i> , Theodore S. Rappaport (1996)
2023.	Excerpt of <i>Digital Communications: Fundamentals and Applications</i> , Bernard Sklar (1998)
2024.	<i>Sprint Teams With ALU, Ericsson, Samsung To Improve Service</i> , December 6, 2010
2025.	Excerpt of United States District Courts – National Judicial Caseload Profile

EXHIBIT	DESCRIPTION
2026.	Defendants' Invalidity Contentions, <i>General Access Solutions, Ltd. v. Cellco Partnership D/B/A Verizon Wireless, et al.</i> , Case No. 2:22-cv-00394-JRG.
2027.	Claim Construction Order, <i>General Access Solutions, Ltd. v. Cellco Partnership D/B/A Verizon Wireless, et al.</i> , Case No. 2:22-cv-00394-JRG. (E.D. Tex. Jan. 12, 2024)
2028.	Declaration of Douglas A. Chrissan, Ph.D.
2029.	Deposition Transcript of Dr. Kevin Almeroth, dated April 5, 2024
2030.	3rd Generation Partnership Project; Technical Specification Group Radio Access Network; Evolved Universal Terrestrial Radio Access (E-UTRA); Physical Channels and Modulation (Release 8)
2031.	Extremetech, May 9, 2012: <i>Is Clearwire the savior of global LTE?</i>
2032.	Curriculum Vitae of Douglas A. Chrissan, Ph.D.
2033.	Patent Owner's Demonstrative Exhibits

Dated: September 13, 2024

Respectfully Submitted,

/Sarah E. Spires/

Sarah E. Spires (Reg. No. 61,501)
SKIERMONT DERBY LLP
1601 Elm St., Suite 4400
Dallas, Texas 75201
P: 214-978-6600/F: 214-978-6601
Lead Counsel for Patent Owner

Michael J. Valaik (*pro hac vice*)
BARTLIT BECK LLP
54 W. Hubbard Street, Suite 300
Chicago, IL 60654
Tel: (312) 494-4400
michael.valaik@bartlitbeck.com

Nosson D. Knobloch (*pro hac vice*)
BARTLIT BECK LLP
1801 Wewatta Street, Suite 1200
Denver, CO 80202
Tel: (303) 592-3100
nosson.knobloch@bartlitbeck.com
Back-Up 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 September 13, 2024, by delivering a copy via electronic mail to the attorneys of record for the Petitioner as follows:

VerizonIPR@venable.com
Justin J. Oliver
USPTO Reg. No. 44,986
VENABLE LLP
joliver@venable.com

Stephen K. Yam
USPTO Reg. No. 64,927
VENABLE LLP
syam@venable.com

John D. Haynes (Reg. No. 44,754)
ALSTON & BIRD LLP
John.Haynes@alston.com

Wesley C. Achey (Reg. No. 56,487)
ALSTON & BIRD LLP
Wes.Achey@alston.com

Steve McNiff (Reg. No. 53,305)
ALSTON & BIRD LLP
Steve.Mcniff@alston.com

Michael C. Deane (Reg. No. 70,389)
ALSTON & BIRD LLP
Michael.Deane@alston.com

Chad C. Walters (Reg. No. 48,022)
BAKER BOTTS L.L.P.
chad.walters@bakerbotts.com

Douglas M. Kuehl (Reg. No. 41,915)
BAKER BOTTS L.L.P.
doug.kuehl@bakerbotts.com

Jeffery S. Becker (Reg. No. 68,533)
BAKER BOTTS L.L.P.
jeff.becker@bakerbotts.com

Andrew Grado (Reg. No. 80,316)
BAKER BOTTS L.L.P.
Andrew.grado@bakerbotts.com

Christopher TL Douglas (Reg. No.
56,950)
ALSTON & BIRD LLP
Christopher.Douglas@alston.com

GAS-Alston@alston.com

Dated: September 13, 2024

Respectfully Submitted,

/Sarah E. Spires/

Sarah E. Spires (Reg. No. 61,501)
Lead Counsel for Patent Owner