Filed on behalf of: AX Wireless, LLC

Entered: May 17, 2024

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

INTEL CORPORATION,
Petitioner,

v.

AX Wireless, LLC,
Patent Owner.

---

Case IPR2023-01135
Patent 9,973,361

---

**PATENT OWNER'S UPDATED EXHIBIT LIST**

Pursuant to 37 C.F.R. § 42.63(e), Patent Owner AX Wireless, LLC respectfully submits the following current exhibit list:

| Exhibit | Description |
|---|---|
| 2001 | Declaration of Zygmunt Haas, Ph.D. ("Haas" or "AXW-2001") |
| 2002 | *Curriculum Vitae* of Zygmunt Haas, Ph.D. ("AXW-2002") |
| 2003 | Institute of Electrical & Electronics Engineers ("IEEE"), *IEEE Standards Association – Documents 802.11* (Oct. 10, 2023), https://mentor.ieee.org/802.11/documents (excerpted) ("AXW-2003") |
| 2004 | IEEE, *IEEE Standards Association – Documents 802.11: Working Group* (Oct. 8, 2023), https://mentor.ieee.org/802.11/documents?is_dcn=DCN%2C%20Title%2C%20Author%20or%20Affiliation&is_group=0000 (screenshot excerpts) ("AXW-2004") |
| 2005 | IEEE, *IEEE Standards Association – Documents 802.11: TGn Working Group (inactive)* (Sept. 20, 2023), https://mentor.ieee.org/802.11/documents?is_group=000n (excerpted) ("AXW-2005") |
| 2006 | IEEE 802.11 Working Group of the 802 Committee, *IEEE P802.11n™/D1.0, Draft Amendment to STANDARD [FOR] Information Technology-Telecommunications and information exchange between systems-Local and Metropolitan networks-Specific requirements-Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) specifications: Enhancements for Higher Throughput* (Mar. 2006) ("AXW-2006") |
| 2007 | IEEE, *IEEE Standards Association – Documents 802.11 (no search terms)* (Sept. 22, 2023), https://mentor.ieee.org/802.11/documents ("AXW-2007") |

| Exhibit | Description |
|---|---|
| 2008 | IEEE, *IEEE Standards Association – Documents 802.11 (all groups; extended range activity)* (Sept. 20, 2023), https://mentor.ieee.org/802.11/documents?is_dcn=extended range ("AXW-2008") |
| 2009 | IEEE, *IEEE Standards Association – Documents 802.11: TGn Working Group (inactive; range search)* (Sept. 20, 2023), https://mentor.ieee.org/802.11/documents?is_dcn=range&is_group=000n ("AXW-2009") |
| 2010 | IEEE, *IEEE Standards Association – Documents 802.11: TGn Working Group (inactive; extended range activity)* (Sept. 20, 2023), https://mentor.ieee.org/802.11/documents?is_dcn=extend&is_group=000n ("AXW-2010") |
| 2011 | IEEE, *IEEE Standards Association – Documents 802.11 (all groups; extended and range search activity)* (Oct. 9, 2023), https://mentor.ieee.org/802.11/documents?is_dcn=extended AND range ("AXW-2011") |
| 2012 | IEEE, *IEEE Standards Association – Documents 802.11 (all groups; range search activity)* (Oct. 10, 2023), https://mentor.ieee.org/802.11/documents?is_dcn=range (excerpted) ("AXW-2012") |
| 2013 | Bruce Kraemer & Adrian Stephens, *TGn Proposed Draft Revision Notice* (Doc. No. IEEE 802.11-06/1061r0) (July 18, 2006), https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fmentor.ieee.org%2F802.11%2Fdcn%2F06%2F11-06-1060-00-000n-tgn-draft-revision-with-additions-and-deletions.ppt&wdOrigin=BROWSELINK ("AXW-2013") |
| 2014 | Gérald Chouinard, *Bringing broadband access to rural and remote areas: The Canadian Experience*, ITU NEWS (commem. ed. 3) (Apr. 2006) ("AXW-2014" or "ITU News") |

| Exhibit | Description |
|---|---|
| 2015 | Matthew S. Gast, *802.11 Wireless Networks: The Definitive Guide* (2d ed. 2005) ("AXW-2015" or "Gast") |
| 2016 | Syed Aon Mujtaba, *TGn Sync Response to Questions* (Doc. No. IEEE 802.11-05/182r2) (Mar. 16, 2005), https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fmentor.ieee.org%2F802.11%2Fdcn%2F05%2F11-05-0182-02-000n-tgnsync-response-to-atlanta-questions.ppt&wdOrigin=BROWSELINK ("AXW-2016") |
| 2017 | Third Amended Docket Control Order, *AX Wireless LLC v. Dell Inc.*, No. 2:22-cv-00277 (E.D. Tex. Oct. 23, 2023), ECF No. 136 ("AXW-2017") |
| 2018 | Third Amended Docket Control Order, *AX Wireless LLC v. Lenovo Grp. Ltd.*, No. 2:22-cv-00280 (E.D. Tex. Oct. 31, 2023), ECF No. 130 ("AXW-2018") |
| 2019 | RESERVED |
| 2020 | *Time to Milestones – Judge Robert W. Schroeder, III: Case Filing Date: On or After Jan. 1, 2008*, Docket Navigator ("AXW-2020") |
| 2021 | Civil Docket, *AX Wireless LLC v. Dell Inc.*, No. 2:22-cv-00277 (E.D. Tex.) (through Nov. 15, 2023) ("AXW-2021") |
| 2022 | Civil Docket, *AX Wireless LLC v. Lenovo Grp. Ltd.*, No. 2:22-cv-00280 (E.D. Tex.) (through Nov. 15, 2023) ("AXW-2022") |
| 2023 | Defendants' P.R. 3-3 Invalidity Contentions and Ineligibility Contentions, *AX Wireless LLC v. Dell Inc. & HP Inc.*, Nos. 2:22-cv-00277, 2:22-cv-00279 (E.D. Tex. Jan. 23, 2023 [served]) ("AXW-2023") |
| 2024 | RESERVED |

| Exhibit | Description |
|---|---|
| 2025 | R. Kennedy, *Amendment to IEEE Standard 802.11-2007 (Project No. P802.11af): Standard for Information Technology - Telecommunications and Information Exchange Between Systems - Local and Metropolitan Area Networks - Specific Requirements - Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) Specifications; Amendment: TV White Spaces Operation* (PAR Request Oct. 2, 2009; PAR Approval Dec. 9, 2009) ("AXW-2025") |
| 2026 | Bruce Kraemer, *Amendment to IEEE Standard 802.11-2007 (Project No. P802.11ah): Standard for Information Technology - Telecommunications and Information Exchange Between Systems - Local and Metropolitan Area Networks - Specific Requirements - Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) Specifications; Amendment: Sub 1 GHz License-Exempt Operation* (PAR Request July 26, 2010; PAR Approval Sept. 30, 2010) ("AXW-2026") |
| 2027 | Xuemei Ouyang et al., *Optimal Antenna Diversity Combining for IEEE 802.11A System*, 48 IEEE TRANSACTIONS CONSUMER ELECS. 738 (Aug. 2002) ("AXW-2027") |
| 2028 | Cenk Kose & Bruce Edwards, *WWiSE Proposal: High Throughput Extension to the 802.11 Standard* (Doc. No. IEEE 802.11-04/0886r6) (Jan. 6, 2005), https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjJq5fyur-CAxUROUQIHan7D4IQFnoECBkQAQ&url=https%3A%2F%2Fmentor.ieee.org%2F802.11%2Fdcn%2F05%2F11-05-0149-00-000n-wwise-proposal-high-throughput-extension-to-802-11-standard.doc&usg=AOvVaw2ryBNHlH79Ugg8pE4IzPVE&opi=89978449 ("AXW-2028" or "March 2005 WWiSE Proposal") |
| 2029 | Mohammad Hossein Manshaei & Thierry Turletti, *Simulation-Based Performance Analysis of 802.11a Wireless LAN*, PROC. INT'L SYMP. TELECOMMS. 758 (Aug. 2003) ("AXW-2029") |

| Exhibit | Description |
|---|---|
| 2030 | IEEE, *IEEE P802.11 – Task Group N – Meeting Update: Status of Project IEEE 802.11n: Standard for Enhancements for Higher Throughput*, https://www.ieee802.org/11/Reports/tgn_update.htm (printed 11/10/2023) ("AXW-2030") |
| 2031 | RESERVED |
| 2032 | RESERVED |
| 2033 | Docket Control Order, *AX Wireless LLC v. Acer Inc.*, No. 2:23-cv-00041-JRG-RSP (E.D. Tex. Oct. 13, 2023), ECF No. 35 ("AXW-2033") |
| 2034 | Defendant Acer Inc.'s Initial Disclosures Pursuant to Paragraphs 1 and 3 of the Discovery Order, *AX Wireless LLC v. Acer Inc.*, No. 2:23-cv-00041-JRG-RSP (E.D. Tex. Oct. 19, 2023) ("AXW-2034") |
| 2035 | Defendant's P.R. 3-3 Invalidity Contentions and Ineligibility Contentions, *AX Wireless LLC v. Acer Inc.*, No. 2:23-cv-00041-JRG-RSP (E.D. Tex. Nov. 30, 2023) ("AXW-2035") |
| 2036 | Defendant HP Inc.'s Rule 72(a) Objections to Order Denying Motion to Transfer to the Northern District of California, *AX Wireless LLC v. HP Inc.*, No. 2:22-cv-00279-JRG-RSP (E.D. Tex. Dec. 21, 2023), ECF No. 101 ("AXW-2036") |
| 2037 | Fourth Amended Docket Control Order, *AX Wireless LLC v. Dell Inc.*, No. 2:22-cv-00277-RWS-RSP (E.D. Tex. Jan. 2, 2024), ECF No. 161 ("AXW-2037") |
| 2038 | Third Amended Docket Control Order, *AX Wireless LLC v. HP Inc.*, No. 2:22-cv-00279-JRG-RSP (E.D. Tex. Jan. 2, 2024), ECF No. 102 ("AXW-2038") |
| 2039 | Declaration of Amit Makker In Response to Petitioner's Objections to Patent Owner's Evidence ("AXW-2039") [*served, not filed*] |

| Exhibit | Description |
|---|---|
| 2040 | Amended Docket Control Order, *AX Wireless LLC v. Lenovo Group Limited*, No. 2:22-cv-0280-JRG-RSP (E.D. Tex. Feb. 24, 2023), ECF No. 58 ("AXW-2040") |
| 2041 | Docket Control Order, *AX Wireless LLC v. Dell Inc.*, No. 2:22-cv-00277-JRG-RSP (E.D. Tex. Dec. 10, 2022), ECF No. 48 ("AXW-2041") |
| 2042 | Declaration of Allison Harms in Support of Patent Owner's Unopposed Motion for *Pro Hac Vice* Admission Under 37 C.F.R. § 42.10(c) |
| 2043 | Declaration of David J. Hlavka in Support of Patent Owner's Unopposed Motion for *Pro Hac Vice* Admission Under 37 C.F.R. § 42.10(c) |

Respectfully submitted,

Dated: May 17, 2024

By: / S. Giri Pathmanaban /

S. Giri Pathmanaban (Reg. No. 75,986)
giri.pathmanaban@lw.com
Latham & Watkins LLP
300 Colorado Street, Suite 2400
Austin, TX 78701-3295
Telephone: 737.910.7300
Fax: 737.910.7301

*Counsel for Patent Owner*
*AX Wireless, LLC*

## CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 17th day of May, 2024, a true and correct copy of the foregoing **Patent Owner's Updated Exhibit List and Exhibit 2042-2043** were served by electronic mail on Petitioner's lead and backup counsel at the following email addresses:

Tyler Bowen (Reg. No. 60,461)
Perkins Coie LLP
2901 N. Central Avenue, Suite 2000
Phoenix, Arizona 85012
bowen-ptab@perkinscoie.com
Tel.: 602.351.8000; Fax: 602.648.7000

Bryan S. Banks (Reg. No. 52,588)
Perkins Coie LLP
2901 North Central Avenue, Suite 2000
Phoenix, Arizona 85012
Banks-ptab@perkinscoie.com
Tel.: 602.351.8096; Fax: 602.648.7043

Jonathan R. Carter (Reg. No. 75,145)
Perkins Coie LLP
1155 Avenue of the Americas, 22nd Floor
New York, New York 10036
Carter-ptab@perkinscoie.com
Tel.: 212.261.6826; Fax: 212.977.1649

Chad Campbell (to be entered *Pro Hac Vice*)
Perkins Coie LLP
2901 N. Central Avenue, Suite 2000
Phoenix, Arizona 85012
campbell-ptab@perkinscoie.com
Tel: 602.351.8000; Fax: 602.648.7000

By: / S. Giri Pathmanaban /

S. Giri Pathmanaban (Reg. No. 75,986)
giri.pathmanaban@lw.com
Latham & Watkins LLP
300 Colorado Street, Suite 2400
Austin, TX 78701-3295
Telephone: 737.910.7300
Fax: 737.910.7301

*Counsel for Patent Owner*
*AX Wireless, LLC*