

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VERIZON CONNECT INC.,
PETITIONER,

V.

OMEGA PATENTS, LLC
PATENT OWNER.

CASE IPR2023-001162
PATENT 8,032,278

PATENT OWNER'S NOTICE OF FILING DEMONSTRATIVE EXHIBITS

EXHIBIT LIST

Exhibit	Description
1001	U.S. Patent No. 8,032,278 to Flick (the '278 Patent)
1002	Declaration of Dr. Azim Eskandarian
1003	U.S. Patent No. 6,756,885 to Flick
1004	U.S. Patent No. 6,606,561 to Flick
1005	U.S. Patent Application Publication No. 2006/016315 to Lewis
1006	U.S. Patent Application Publication No. 2003/0182003 to Underdahl
1007	U.S. Patent No. 6,011,460 to Flick
1008	U.S. Patent No. 6,812,829 to Flick
1009	File History of Application No. 11/773,272, which issued as U.S. Patent No. 8,032,278 to Flick
1010	03-25-2021 Order Granting the Reexamination (Appl. No. 90/014,675)
1011	06-21-2021 Examiner's Non-Final Office Action (Appl. No. 90/014,675)
1012	08-21-2021 Declaration of Joseph C. McAlexander, III
1013	08-23-2021 Response to Non-Final Office Action (Appl. No. 90/014,675)
1014	04-01-2022 Patent Owner's Appeal Brief (Appl. No. 90/014,675)
1015	12-01-2022 Decision on Appeal (Appl. No. 90/014,675)
1016	Application No. 11/076,259 to Flick
1017	Application No. 10/383,496 to Flick
1018	Application No. 09/859,972 to Flick
1019	Application No. 60/264,811 to Flick
1020	Application No. 60/258,005 to Flick
1021	Application No. 60/251,552 to Flick
1022	Application No. 60/252,125 to Flick
1023	Application No. 60/236,890 to Flick
1024	Application No. 60/246,463 to Flick
1025	Application No. 60/222,777 to Flick
1026	Application No. 60/205,178 to Flick
1027	10-03-2014 Plaintiff's Opposition to CalAmp's Motion for Claim Construction, 6:13-cv-1950-ORL-40-DAB
1028	02-20-2015 Order on Claim Construction, 6:13-cv-1950-ORL-40-DAB
1029	<i>In Ex Parte A. James Smith, Jr.</i> , 2010 WL 3269939 (BPAI August 17,

	2010).
1030	07-23-2024 Deposition of Joseph C. McAlexander, III, P.E.
1031	07-19-2024 Deposition of Christian Tregillis
1033	Supplemental Declaration of Dr. Azim Eskandarian
2001	Declaration of Kenneth Flick
2002	Declaration of Mr. Joseph C. McAlexander, III
2003	Curriculum Vitae of Mr. Joseph C. McAlexander, III
2004	Decision Granting Institution of <i>Inter Partes</i> Review; Paper 11, IPR2023-00504 (July 25, 2023)
2005	<i>Ex Parte Omega Patents, LLC</i> , No. 2018-008119 (Nov. 13, 2018)
2006	D.I. 34, Claim Construction Order, <i>Omega Patents, LLC v. Firstech, LLC</i> , No. 2:20-cv-03144 (W.D. Wash. Nov. 22, 2021) (“ <i>Firstech-CC</i> ”)
2007	<i>Omega Patents, LLC v. CalAmp Corp.</i> , 920 F.3d 1337 (Fed. Cir. 2019) (<i>CalAmp-I</i>)
2008	<i>Omega Patents, LLC v. CalAmp Corp.</i> , 13 F.4th 1361 (Fed. Cir. 2021) (<i>CalAmp-II</i>)
2009	<i>Ex Parte</i> Reexamination Certificate for U.S. Patent No. 8,032,278 issued May 17, 2023
2010	D.I. 297-1, Deposition of Galin Chen, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13- cv-1950 (M.D. Fla. September 24, 2019)
2011	D.I. 297-4, Deposition of Peter Hergesheimer, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13- cv-1950 (M.D. Fla. September 24, 2019)
2012	D.I. 297-5, Deposition of Stephen Hall, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13- cv-1950 (M.D. Fla. September 24, 2019)
2013	U.S. Patent No. 6,636,790 to Lightner
2014	U.S. Patent No. 6,611,740 to Lowrey
2015	U.S. Patent No. 6,957,133 to Hunt
2016	U.S. 6,732,031 to Lightner
2017	U.S. 7,174,243 to Lightner
2018	Prosecution File History of U.S. Patent Application Publication No. 2006/016315 to Lewis
2019	Declaration of Mr. Christian Tregillis
2020	D.I. 145-43, PL47, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
2021	D.I. 145-19, PL1, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
2022	D.I. 145-20, PL2, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-

	1950 (M.D. Fla. Feb 25, 2016)
2023	D.I. 145-34, PL18, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
2024	D.I. 145-36, PL20, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
2025	D.I. 145-59, PL73, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
2026	Master And Cross-License Agreement, dated May 12, 2007, between Omega R&D, Omega Patents and Directed Electronics, Inc.
2027	D.I. 145-38, PL22, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
2028	D.I. 145-80, PL99, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
2029	D.I. 145-54, PL68, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
2030	D.I. 145-53, PL67, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
2031	D.I. 145-67, PL81, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
2032	D.I. 144, Jury Verdict, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Sep. 30, 2019)
2033	D.I. 310, Jury Verdict, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb. 24, 2016)
2034	Omega Royalty Report (April 2023)
2035	Prosecution History of Ser. No. 90/013,587 (RX1)
2036	Prosecution History of Ser. No. 90/013,851 (RX2)
2037	Prosecution History of Ser. No. 90/014,309 (RX3)
2038	Prosecution History of Ser. No. 90/014,419 (RX4)
2039	Prosecution History of Ser. No. 90/014,675 (RX5)
2040	D.I. 145-28, PL11, <i>Omega Patents, LLC v. CalAmp Corp.</i> , No. 6:13-cv-1950 (M.D. Fla. Feb 25, 2016)
2041	RESERVED
2042	U.S. Patent No. 7,149,623 to Flick
2043	U.S. Patent No. 6,028,537 to Suman et al.
2044	Supplemental Declaration of Mr. Joseph C. McAlexander, III
2045	Curriculum Vitae of Mr. Joseph C. McAlexander, III (updated 2Q2024)
2046	Patent Owner's Demonstrative Exhibits

Pursuant to 37 CFR § 42.6(e)(4)(ii), and the Board's Order Setting Oral Argument (Paper 27), Patent Owner submits the following Exhibit for use at the Oral Argument:

Exhibit	Description
2046	Patent Owner's Demonstrative Exhibits

Respectfully submitted this September 17, 2024.

/s/Ryan T. Santurri

Ryan T. Santurri, Reg No. 61,894

rsanturri@allender.com

Allen, Dyer, Doppelt + Gilchrist, P.A.

255 South Orange Avenue, Suite

1401

Post Office Box 3791

Orlando, Florida 32801-3791

Telephone: 407-841-2330

Facsimile: 407-841-2343

Lead Counsel

David S. Carus. Reg No. 59,291

dcarus@allender.com

Christopher F. Regan, Reg No. 34,906

cregan@allender.com

Allen, Dyer, Doppelt + Gilchrist, P.A.

1135 E. State Road 434, Suite 3001

Winter Springs, FL 32709

Telephone: 407-796-5051

Facsimile: 407-796-5065

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 13, 2024, true and correct copies of the foregoing document, including any exhibits filed therewith, was served via electronic email upon the following counsel of record for Petitioners:

Asheesh (Ashe) P. Puri, Esq. Nixon Peabody LLP 300 South Grand Avenue, Suite 4100 Los Angeles, CA 90071-3151 apuri@nixonpeabody.com	Sasha G. Rao, Esq. Nixon Peabody LLP One Embarcadero Center, 32nd Floor San Francisco, CA 94111 srao@nixonpeabody.com
---	--

Dated: November 15, 2024

Respectfully submitted,

/s/Ryan T. Santurri

Ryan T. Santurri, Reg No. 61,894

rsanturri@allendyer.com

Allen, Dyer, Doppelt + Gilchrist, P.A.
255 South Orange Avenue, Suite 1401
Post Office Box 3791

Orlando, Florida 32801-3791

Telephone: 407-841-2330

Facsimile: 407-841-2343

Lead Counsel

David S. Carus, Reg No. 59,291

dcarus@allendyer.com

Christopher F. Regan, Reg No. 34,906

cregan@allendyer.com

Allen, Dyer, Doppelt + Gilchrist, P.A.
1135 E. State Road 434, Suite 3001
Winter Springs, FL 32709

Telephone: 407-796-5051

Facsimile: 407-796-5065