**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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SEMICONDUCTOR COMPONENTS INDUSTRIES, LLC and TEXAS INSTRUMENTS INCORPORATED,

Petitioner,

v.

GREENTHREAD, LLC,

Patent Owner

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IPR2023-01242[1]
Patent 11,121,222

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**PETITIONER'S UPDATED EXHIBIT LIST**

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[1] Texas Instruments Incorporated, which filed a petition in IPR2024-00673, has been joined as a petitioner in this proceeding.

# EXHIBIT LIST

| Exhibit No. | Description |
|---|---|
| 1001 | U.S. Patent No. 11,121,222 to Rao (the "'222 Patent") |
| 1002 | Prosecution History of the '222 Patent |
| 1003 | Declaration of Travis Blalock, PhD |
| 1004 | Curriculum Vitae of Travis Blalock, PhD |
| 1005 | Publication Declaration of Sean O'Bryan for Maziasz ("O'Bryan Decl.") |
| 1006 | U.S. Patent Application Publication No. 2003/0183856 to Wieczorek ("Wieczorek") |
| 1007 | U.S. Patent No. 6,043,114 to Kawagoe, et al. ("Kawagoe") |
| 1008A | Stanley Wolf and Richard N. Tauber, *Silicon Processing For The VLSI Era,* Vol 1, Lattice Press (2000) ("Wolf.1") |
| 1008B | Stanley Wolf and Richard N. Tauber, *Silicon Processing For The VLSI Era,* Vol. 2, Lattice Press (2000) ("Wolf.2") |
| 1008C | Stanley Wolf and Richard N. Tauber, *Silicon Processing For The VLSI Era,* Vol. 3, Lattice Press (2000) ("Wolf.3") |
| 1008D | Stanley Wolf and Richard N. Tauber, *Silicon Processing For The VLSI Era,* Vol. 4, Lattice Press (2000) ("Wolf.4") |
| 1009 | Wang and Agrawal, *Single Event Upset: An Embedded Tutorial*, 21st Intl Conf on VLSI Design, IEEE 2008 ("Wang") |
| 1010 | U.S. Patent No. 4,481,522 ("Jastrzebski") |
| 1011 | Publication Declaration of Martin L. Knott for Rabaey ("Knott Decl.") |
| 1012 | Publication Declaration of Alyssa G. Resnick for Wolf.1 and Wolf.2 ("Resnick Decl.") |
| 1013 | Publication Declaration of Rachel J. Watters for Wolf.3 and Wolf.4 ("Watters Decl.") |
| 1014 | U.S. Patent No. 6,163,877 ("Gupta") |
| 1015 | U.S. Patent No. 6,534,805 ("Jin") |
| 1016 | Excerpts from the Prosecution History of U.S. Patent No. 8,421,195 (the "'195 Patent") |
| 1017 | Patent Owner's Proposed Constructions |
| 1018 | Defendants' Preliminary Proposed Constructions |
| 1019 | Defendants' Opening Claim Construction Brief |
| 1020 | Patent Owner's Responsive Claim Construction Brief |
| 1021 | Defendants' Reply Claim Construction Brief |

| Exhibit No. | Description |
|---|---|
| 1022 | Sze, *Semiconductor Devices Physics and Technology*, 2d Ed., John Wiley & Sons (2002) |
| 1023 | Maziasz and Hayes, *Layout Minimization of CMOS Cells*, Kluwer Academic Publishers (1992) ("Maziasz") |
| 1024 | U.S. District Courts – Case Statistics, obtained at https://www.uscourts.gov/statistics-reports/analysis-reports/federal-court-management-statistics, dated March 31, 2023 |
| 1025 | Rabaey *et al.*, *Digital Integrated Circuits, A Design Perspective,* Prentice Hall Electronics and VLSI Series (2003) ("Rabaey") |
| 1026 | Gregory and Shafer, "Latch-Up In CMOS Integrated Circuits," IEEE Transactions on Nuclear Science, Volume 20, Issue 6 (1973) |
| 1027 | U.S. Patent Application Publication No. 2007/0045682 to Hong *et al*. ("Hong") |
| 1028 | Excerpts from the Prosecution History of U.S. Patent Application No. 10/934,915 (the "'915 App.") |
| 1029 | Excerpts from the Prosecution History of U.S. Patent No. 9,190,502 (the "'502 Patent") |
| 1030 | Excerpts from the Prosecution History of U.S. Patent Application No. 13/854,319 (the "'319 App.") |
| 1031 | U.S. Patent No. 4,160,985 to Kamins *et al.* ("Kamins") |
| 1032 | McGraw-Hill Dictionary of Scientific and Technical Terms (2003) |
| 1033 | U.S. Patent No. 9,647,070 to Rao (the "'070 Patent") |
| 1034 | U.S. Patent Application Publication No. 2003/0030488 to Hueting *et al.* ("Hueting") |
| 1035 | [Intentionally Omitted] |
| 1036 | Proposed Claim Constructions in the Intel Litigation |
| 1037 | Howe and Sodini, *Microelectronics, An Integrated Approach*, Prentice Hall Electronics and VLSI Series (1997) ("Howe") |
| 1038 | Hodges *et al.*, *Analysis and Design of Digital Integrated Circuits In Deep Submicron Technology,* 3rd Ed., McGraw-Hill (2004) ("Hodges") |
| 1039 | Publication Declaration of Martin L. Knott for Hodges ("Knott Decl.") |
| 1040 | Jaeger, *Microelectronic Circuit Design*, McGraw-Hill (1997) ("Jaeger") |
| 1041 | Kang and Leblebici, *CMOS Digital Integrated Circuits Analysis and Design*, McGraw-Hill (2003) ("Kang") |

| Exhibit No. | Description |
|---|---|
| 1042 | U.S. Patent No. 6,614,560 ("Silverbrook") |
| 1043 | Publication Declaration of Sylvia Hall-Ellis for Wolf |
| 1044 | Wong, H. P., et al. "CMOS active pixel image sensors fabricated using a 1.8-V, 0.25-µm CMOS technology." IEEE Transactions on Electron Devices 45.4 (1998): 889-894. |
| 1045 | Law360 Article "Stays Pending IPR In Del. District Courts Are Here To Stay," Kraning and Del Dotto, March 11, 2022. |
| 1046 | E-mail from Nicholas T. Matich on October 11, 2023 at 5:31 PM. |
| 1047 | E-mail from Nicholas T. Matich on October 12, 2023 at 12:09 AM. |
| 1048 | Greenthread's Second Amended Complaint in *Greenthread, LLC v. Dell Inc., Dell Technologies, Inc., Sony Group Corporation, Sony Semiconductor Solutions Corp., Sony Semiconductor Manufacturing Corp., Sony Mobile Communications, Inc., Sony Interactive Entertainment Inc., Sony Interactive Entertainment LLC, Sony Corporation of America, and Sony Electronics Inc.*, Civil Action No. 6:22-cv-105-ADA, filed January 23, 2023. |
| 1049 | Greenthread's First Amended Complaint in *Greenthread, LLC v. Intel Corporation, Dell Inc., and Dell Technologies Inc.*, Civil Action No. 6:22-cv-105-ADA, filed April 29, 2022. |
| 1050 | Joint Motion to Stay All Deadlines and Notice of Settlement in *Greenthread, LLC v. Intel Corporation*, Civil Action No. 3:22-cv-2001-JR, filed April 12, 2023. |
| 1051 | RPX FAQs |
| 1052 | Transcript of Deposition of Alexander Glew, PHD in IPR2023-01242, -01243, -01244 |
| 1053 | Transcript of Deposition of Philip John in IPR2023-01242, -01243, -01244 |
| 1054 | Office Action Response, dated August 1, 2024, in U.S. Patent Application No. 17/728,588 |
| 1055 | Declaration of Douglas Holberg, dated August 1, 2024, in U.S. Patent Application No. 17/728,588 |
| 1056 | Petitioner's Hearing Demonstratives |

Dated: November 12, 2024

Respectfully submitted,
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## CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 12th day of November, 2024, **PETITIONER'S UPDATED EXHIBITS LIST AND EXHIBIT 1056** was served by email on the following counsel for Patent Owner and the Joined Petitioner:

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