

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

OPTICIS CO., LTD

Petitioner,

v.

INNEOS LLC,

Patent Owner.

Case No. IPR2023-01256

U.S. Patent No. 7,198,416

PATENT OWNER'S UPDATED EXHIBIT LIST

EXHIBIT LIST

Exhibit No.	Description
2003	Declaration of Dr. Michael Lebby, Ph.D.
2004	WEBSTER'S NINTH NEW COLLEGIATE DICTIONARY 962, 1059, 1061, 1161 (9th ed.1986).
2005	<i>Radial</i> , CHAMBERS DICTIONARY OF SCIENCE AND TECHNOLOGY (rev. ed. 1974).
2006	<i>Ferrule</i> , NEWTON'S TELECOM DICTIONARY (21st ed. 2005).
2007	JOSEPH E. PALAIS, FIBER OPTIC COMMUNICATIONS 33–48 (2nd ed. 1988).
2008	<i>Fiber optic spot illumination</i> , FIBER OPTICS STANDARD DICTIONARY (2nd ed. 1989).
2009	Pages of Eric Grann Inventor Notebook.
2010	Curtis Ray Inventor Notebook.
2011	Declaration of Michael Liang.
2012	Wilfrid B. Veldkamp et al., <i>Coherent Summation of Laser Beams Using Binary Phase Gratings</i> , 11 OPTICS LETTERS, 303–05 (1986).
2013	J. W. Goodman et al., <i>Optical Interconnections for VLSI Systems</i> , 7 PROCEEDINGS OF THE IEEE, 850–66 (1984).
2014	H. John Caulfield, <i>Parallel N4 Weighted Optical Interconnections</i> , 26 APPLIED OPTICS, 4039–40 (1987).

Exhibit No.	Description
2015	Adolf W. Lohmann et al., <i>Optical Perfect Shuffle</i> , 25 APPLIED OPTICS, 1530–31 (1986).
2016	<i>Ferrule</i> , NEWTON’S TELECOM DICTIONARY (28th ed. 2014).
2017	JEFF HECHT, UNDERSTANDING FIBER OPTICS 317 (5th ed. 2015).
2018	U.S. Patent No. 6,201,908 to Grann.
2019	Scheduling Order, Dkt. 53, Inneos LLC v. Opticis Co. Ltd. et al., No. 8-23-cv-00185 (C.D. Cal. Aug. 10, 2023).
2020	Order Denying Stay, Dkt. 74, Inneos LLC v. Opticis Co. Ltd. et al., No. 8-23-cv-00185 (C.D. Cal. Sept. 13, 2023).
2021	<i>Ferrule</i> , IBM DICTIONARY OF COMPUTING (10th ed. 1993).
2022	Opticis USA’s Notice of Joinder in Connection with Motion to Stay, Dkt. 70, Inneos LLC v. Opticis Co. Ltd. et al., No. 8-23-cv-00185 (C.D. Cal. Aug. 28, 2023).
2023	Exhibit from April 11, 2024, Deposition of Dr. Alan Willner, Ph.D., University of Southern California Optical Communication Laboratory Research Webpage Printout.
2024	Exhibit from April 11, 2024, Deposition of Dr. Alan Willner, Ph.D., Annotated Optical Communication Laboratory Research Webpage Printout, dated April 11, 2024.
2025	Exhibit from April 11, 2024, Deposition of Dr. Alan Willner, Ph.D., Declaration in Support of Defendant Opticis Co., Ltd.’s Opening Claim Construction Brief, Dkt. 83, Inneos LLC v. Opticis Co. Ltd. et al., No. 8-23-cv-00185 (C.D. Cal. Dec. 15, 2023).

Exhibit No.	Description
2026	Exhibit from April 11, 2024, Deposition of Dr. Alan Willner, Ph.D., Exhibit A to the Declaration of Dr. Alan Willner, Ph.D. (EX1003)
2027	Computer file titled “straightmux”, last modified October 16, 2003.
2028	Computer file titled “straightmuxsec”, last modified October 16, 2003.
2029	Computer file titled “ceramic”, last modified July 18, 2003.
2030	Computer file titled “ymux”, last modified July 21, 2003.
2031	Computer file titled “ymuxxsec”, last modified October 16, 2003.
2032	Email from Curtis Ray to Eric Grann with attachment, dated October 16, 2003.
2033	Windows Explorer window containing metadata for “straightmux,” “straightmuxsec,” and “ymuxxsec”.
2034	Email from Curtis Ray to Brian Peters and Eric Grann with screenshot of attachment, dated November 11, 2003.
2035	Email from Curtis Ray to Eric Grann with screenshot of attachment sheet 1, dated January 13, 2004.
2036	Email from Brian Peters to Mike Rogers, dated July 17, 2003.
2037	Computer file titled “Ultem Focuser”, last modified July 21, 2003.

Exhibit No.	Description
2038	Computer file titled “Utem Focuser.SMF”, last modified July 22, 2003.
2039	Windows Explorer window containing metadata for “Utem Focuser” and “Utem Focuser.SMF”.
2040	Windows Explorer window containing metadata for “New LX4 mux with 500 micron pitch” and contents of “New LX4 mux with 500 micron pitch”.
2041	Email from Brian Peters to Hatch Graham, dated December 8, 2003.
2042	Computer file titled “Single Lens LX4 coupler1”, last modified January 9, 2004.
2043	Windows Explorer window containing metadata for “Single Lens LX4 coupler1”.
2044	Windows Explorer window containing metadata for “ceramic” and “ymux”.
2045	Declaration of Curtis Ray, dated April 23, 2024.
2046	Declaration of Eric Grann, dated April 23, 2024.
2047	Declaration of Scott Fluegel, dated April 23, 2024.
2048	Deposition Transcript of Dr. Alan Willner, Ph.D., dated April 11, 2024.
2049	Supplemental Declaration of Dr. Michael Lebby, Ph.D.

Exhibit No.	Description
2050	Email from Brian Peters to Eric Grann and Curtis Ray, dated November 10, 2003.
2051	EXPUNGED
2052	EXPUNGED
2053	EXPUNGED
2054	RESERVED
2055	RESERVED
2056	Deposition Transcript of Dr. Alan Willner, Ph.D., dated August 29, 2024.
2057	Patent Owner's Oral Argument Demonstratives

Date: November 6, 2024

Respectfully submitted,

/s/ Barry J. Herman

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Carrie Richey (*pro hac vice*)

Counsel for Patent Owner Inneos LLC

CERTIFICATE OF SERVICE

The undersigned certifies that on November 6, 2024, that a true and correct copy of the foregoing was served on Counsel for Petitioner via filing through the P-TACTS, as well as by delivering a copy via electronic mail to the following email address(es):

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