

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS INC.,

Petitioner,

v.

PANTECH WIRELESS, LLC

Patent Owner.

Case IPR2023-01267

U.S. Patent No. 9,313,809

PETITIONER'S UPDATED LIST OF EXHIBITS

UPDATED LIST OF EXHIBITS

Exhibit ("Ex.")	Description
1001	U.S. Patent No. 9,313,809 ("809")
1002	File History of U.S. Application No. 14/319,608 ("809FH")
1003	Declaration of Dr. Bertrand Hochwald in Support of Petition for <i>Inter Partes</i> Review of U.S. Patent No. 9,313,809 ("Hochwald")
1004	Declaration of Friedhelm Rodermund in Support of Petition for <i>Inter Partes</i> Review of U.S. Patent No. 9,313,809 ("Rodermund")
1005	U.S. Patent Application Publication No. 2009/0225709 ("Wager")
1006	U.S. Provisional Application No. 61/015,316 ("Wager-Prov.")
1007	International Publication No. WO 2007/078155 ("Lee")
1008	R2-073254, <i>Further discussion on enhanced CELL_FACH in REL8</i> ("R2-073254" or "Nokia")
1009	3GPP Technical Specification TS 25.321 v7.5.0 (2007-06) ("TS25.321")
1010	U.S. Patent Application Publication No. 2006/0176845 ("Sarkkinen")
1011	3GPP Technical Specification TS 25.331 v7.5.0 (2007-06) ("TS25.331")
1012	U.S. Patent Application Publication No. 2006/0251027 ("Chun")
1013	U.S. Patent Application Publication No. 2009/0131052 ("Hakola")
1014	U.S. Provisional Application No. 60/985,537 ("Hakola-Prov.")
1015	International Publication No. WO 2008/081222 ("Lindskog")
1016	International Publication No. WO 2005/018241 ("Seidel")
1017	U.S. Patent Application Publication No. 2009/0006778 ("Sidi")

Exhibit ("Ex.")	Description
1018	U.S. Patent Publication No. 2005/0276266 ("Terry-266")
1019	WO Patent Application 2009/022855 ("Sung")
1020	U.S. Patent Publication No. 2005/0251722 ("Terry-722")
1021- 1025	(Reserved)
1026	U.S. Patent No. 8,774,104 ("104")
1027	File History of U.S. Application No. 12/238,910 ("104FH")
1028	U.S. Provisional Application No. 60/982,528 ("528-Prov.")
1029	U.S. Provisional Application No. 60/975,985 ("985-Prov.")
1030	Third Amended Docket Control Order, <i>Pantech Corp. et al. v. LG Electronics Inc. et al.</i> , Case 5:22-cv-00113-RWS-JBB (E.D. Texas), Dkt. No. 98.
1031	Docket Navigator "Time to Trial" report for Judge Robert W. Schroeder
1032	USCourts.gov "U.S. District Court – Judicial Caseload Profile" for Eastern District of Texas
1033	Joint Claim Construction and Prehearing Statement, <i>Pantech Corp. et al. v. LG Electronics Inc. et al.</i> , Case 5:22-cv-00113-RWS-JBB (E.D. Texas), Dkt. No. 118.
1034	University of Notre Dame, Wireless Institute, "RadioHound: Distributed Spectrum Sensing"
1035	3GPP, "Introducing 3GPP"
1036	3GPP, "About 3GPP"
1037	3GPP, "Specifications Per TSG Round"

Exhibit ("Ex.")	Description
1038	ShareTechnote, "4G/LTE RACH"
1039	3GPP, "36.321"
1040	3GPP Technical Specification TS 36.321 v8.0.0 (2007-12) ("TS36.321")
1041	U.S. Patent No. 6,363,121
1042- 1044	(Reserved)
1045	Declaration of Jonathan Bradford
1046- 1050	(Reserved)
1051	Webpage, available at https://archive.org/legal/affidavit.php
1052	Internet Archive Capture, available at https://web.archive.org/web/20070705003208/http://www.3gpp.org/tb/home.htm
1053	Internet Archive Capture, available at https://web.archive.org/web/20070707102325/http://www.3gpp.org/
1054	Internet Archive Capture, available at https://web.archive.org/web/20070710032216/http://www.3gpp.org/tb/RAN/RAN2/RAN2.htm
1055	Internet Archive Capture, available at https://web.archive.org/web/20070701154418/http://www.3gpp.org/ftp/tsg_ran/WG2_RL2/
1056	Internet Archive Capture, available at https://web.archive.org/web/20071129220816/http://www.3gpp.org:80/ftp/tsg_ran/WG2_RL2/TSGR2_55/
1057	Webpage, available at ftp.3gpp.org/Specs

Exhibit ("Ex.")	Description
1058	Internet Archive Capture, available at https://web.archive.org/web/20070820091849/http://www.3gpp.org:80/specs/specs.htm
1059	Internet Archive Capture, available at https://web.archive.org/web/20070810002551/http://www.3gpp.org/specs/numbering.htm
1060	Internet Archive Capture, available at https://web.archive.org/web/20070810232434/http://www.3gpp.org/ftp/Specs/html-info/25-series.htm
1061	Internet Archive Capture, available at https://web.archive.org/web/20070905143259/http://www.3gpp.org/ftp/Specs/html-info/SpecReleaseMatrix.htm
1062	Internet Archive Capture, available at https://web.archive.org/web/20070525204220/http://www.3gpp.org/ftp/Specs/html-info/TSG-WG--R2.htm
1063	Internet Archive Capture, available at https://web.archive.org/web/20070523112802/http://www.3gpp.org/ftp/Specs/html-info/25321.htm
1064	3GPPP TS 25.321 V7.4.0 (2007-03), retrieved from https://web.archive.org/web/20070523112802/http://www.3gpp.org/ftp/Specs/archive/25_series/25.321/25321-740.zip (25321-740.doc in 25321-740.zip)
1065	Internet Archive Capture, available at https://web.archive.org/web/20070602105532/http://www.3gpp.org/ftp/Specs/latest/Rel-7/
1066	Internet Archive Capture, available at https://web.archive.org/web/20070907224517/http://www.3gpp.org/ftp/Specs/latest/Rel-7/25_series/

Exhibit ("Ex.")	Description
1067	Internet Archive Capture, available at https://web.archive.org/web/20070704003509/http://www.3gpp.org:80/ftp/specs/latest/
1068	Internet Archive Capture, available at https://web.archive.org/web/20060105222647/http://list.etsi.org/scripts/wa.exe?SUBED1=3gpp_tsg_ran_wg2&A=1
1069	Webpage, available at https://www.3gpp.org/FTP/tsg_ran/WG2_RL2/TSGR2_59/Docs/
1070	Webpage, available at https://list.etsi.org/scripts/wa.exe?A2=3GPP_TSG_RAN_WG2;3cceb99d.0708&S=
1071	R2-073254, retrieved from https://list.etsi.org/scripts/wa.exe?A3=ind0708&L=3GPP_TSG_RAN_WG2&E=base64&P=7845927&B=-----_%3D_NextPart_001_01C7DE81.00F02165&T=application%2Fzip-compressed;%20name=%22R2-073254.zip%22&N=R2-073254.zip&attachment=q&XSS=3 (R2-073254 Enhanced RACH.doc in R2-073254.zip)
1072	Internet Archive Capture, available at https://web.archive.org/web/20070714151920/http://list.etsi.org:80/
1073	Internet Archive Capture, available at https://web.archive.org/web/20070816051307/http://list.etsi.org/
1074	Internet Archive Capture, available at https://web.archive.org/web/20080719190403/http://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_59/Docs/
1075	R2-073254, retrieved from https://web.archive.org/web/20080719190403/http://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_59/Docs/R2-073254.zip (R2-073254 Enhanced RACH.doc in R2-073254.zip)

Exhibit ("Ex.")	Description
1076	Draft0 minutes of the 59 TSG-RAN WG2 meeting (Athens, Greece, 25-29 June 2007), available at https://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_59/Minutes/Draft0_Minutes_RAN2-59.zip (Draft0_Minutes_RAN2-59.doc in Draft0_Minutes_RAN2-59.zip)
1077	Webpage, available at https://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_59/Minutes
1078	Excel file "3GPPRAN2_59.xls," retrieved from https://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_59/Minutes/R2-074444.zip (3GPPRAN2_59.xls in R2-074444.zip)
1079	Draft3 minutes of the 59 TSG-RAN WG2 meeting (Athens, Greece, 25-29 June 2007) (R2-074444), retrieved from https://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_59/Minutes/R2-074444.zip (Draft3_Minutes_RAN2-59.doc in R2-074444.zip)
1080	Webpage, available at https://www.3gpp.org/FTP/Specs/archive/25_series/25.321
1081	Webpage, available at https://www.etsi.org/deliver/etsi_ts/125300_125399/125321/07.05.00_60/
1082	ETSI Technical Specification 125 321 V7.5.0 (2007-06), retrieved from https://www.etsi.org/deliver/etsi_ts/125300_125399/125321/07.05.00_60/ts_125321v070500p.pdf
1083	Webpage, available at https://web.archive.org/web/20131115195236/http://webapp.etsi.org/key/key.asp?full_list=y
1084	Internet Archive Capture, available at https://web.archive.org/web/20070814155639/http://www.3gpp.org/ftp/Specs/archive/25_series/25.321/

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1085	Internet Archive Capture, available at https://web.archive.org/web/20070827053924/http://www.3gpp.org:80/ftp/Specs/html-info/25321.htm
1086	(Reserved)
1087	Document entitled "3GPP specifications - List of all specification numbers and titles," retrieved from https://web.archive.org/web/20071101043800/http://www.3gpp.org/specs/3GPP-Spec-Titles.zip (3GPP-Spec-Titles.doc in 3GPP-Spec-Titles.zip)
1088	Internet Archive Capture, available at https://web.archive.org/web/20071112134824/http://www.3gpp.org/ftp/Specs/html-info/SpecReleaseMatrix.htm
1089	Internet Archive Capture, available at https://web.archive.org/web/20070815092224/http://www.3gpp.org/ftp/Specs/archive/
1090	Webpage, available at https://www.etsi.org/deliver/etsi_ts/125300_125399/125331/07.05.00_60/
1091	ETSI Technical Specification 125 331 V7.5.0 (2007-06), retrieved from https://www.etsi.org/deliver/etsi_ts/125300_125399/125331/07.05.00_60/ts_125331v070500p.pdf
1092	Webpage, available at https://www.3gpp.org/ftp/Specs/archive/25_series/25.331
1093	Internet Archive Capture, available at https://web.archive.org/web/20070902031859/http://www.3gpp.org:80/ftp/Specs/archive/25_series/25.331/
1094	(Reserved)
1095	3GPP Technical Specification 25.331 v7.5.0 (2007-06) printed in unmodified form, retrieved from

Exhibit ("Ex.")	Description
	https://www.3gpp.org/ftp/Specs/archive/25_series/25.331/25331-750.zip (25331-750.doc in 25331-750.zip)
1096	Internet Archive Capture, available at https://web.archive.org/web/20070525204220/http://www.3gpp.org:80/ftp/Specs/html-info/TSG-WG--R2.htm
1097	Internet Archive Capture, available at https://web.archive.org/web/20070818015343/http://www.3gpp.org/ftp/Specs/
1098	Internet Archive Capture, available at https://web.archive.org/web/20070815120847/http://www.3gpp.org/ftp/Specs/archive/25_series/
1099	Internet Archive Capture, available at https://web.archive.org/web/20070901000715/http://www.3gpp.org/ftp/Specs/latest/
1100	Internet Archive Capture, available at https://web.archive.org/web/20070901000642/http://www.3gpp.org/ftp/Specs/latest/Rel-7/
1101	Internet Archive Capture, available at https://web.archive.org/web/20070818215743/http://www.3gpp.org/ftp/Specs/html-info/25331.htm
1102	Transcript of November 1, 2023 Call with the Board
1103-1199	(Reserved)
1200	Proposed Protective Order
1201	Declaration of Hojun Suh (Confidential)
1202	Declaration of Soo Hong (Confidential)
1203	(Reserved—See Ex. 1001)

Exhibit ("Ex.")	Description
1204	U.S. Patent No. 9,575,631
1205	U.S. Patent No. 9,854,545
1206	U.S. Patent No. 10,869,247
1207	U.S. Patent No. 9,065,486
1208	U.S. Patent No. 9,136,924
1209	<i>Pantech Corp. v. LG Electronics Inc.</i> , Case No. 5:22-cv-00113 (E.D. Tex.), Dkt. 182 (Order Regarding LGE's Motion for Disqualification) (Public Version)
1210	<i>Pantech Corp. v. LG Electronics Inc.</i> , Case No. 5:22-cv-00113 (E.D. Tex.), Dkt. 1 (<i>Pantech</i> Complaint)
1211	<i>Pantech Corp. v. LG Electronics Inc.</i> , Case No. 5:22-cv-00113 (E.D. Tex.), Dkt. 60-1 (Second Declaration of Jamie B. Beaber in Support of Plaintiff's Opposition to Defendants' Motion to Disqualify Mayer Brown) (Confidential)
1212	<i>Pantech Corp. v. LG Electronics Inc.</i> , Case No. 5:22-cv-00113 (E.D. Tex.), Dkt. 40 (Defendants' Motion to Disqualify Mayer Brown LLP) (Public Version)
1213	<i>Pantech Corp. v. LG Electronics Inc.</i> , Case No. 5:22-cv-00113 (E.D. Tex.), Dkt. 40 (Magistrate Order Regarding LGE's Motion for Disqualification) (Public Version)
1214	<i>In re LG Electronics Inc. and LG Electronics U.S.A., Inc.</i> , Case No. 23-148 (Fed. Cir.), Dkt. 8-1 (LG Electronics Inc. and LG Electronics U.S.A., Inc.'s Petition For Writ Of Mandamus) (Public Version)
1215	<i>Pantech Corp. v. LG Electronics Inc.</i> , Case No. 5:22-cv-00113 (E.D. Tex.), Dkt. 15-28 (<i>Jenam</i> Agreement) (Confidential)
1216	<i>Pantech Corp. v. LG Electronics Inc.</i> , Case No. 5:22-cv-00113 (E.D. Tex.), Dkt. 56 (Plaintiffs' Opposition to Defendants' Motion to Disqualify Mayer Brown LLP) (Public Version)

Exhibit ("Ex.")	Description
1217	<i>Cellular Comm's. Equip. v. LG Electronics, Inc.</i> , 6:14-cv-00982 (E.D. Tex.), Dkt. 1 (CCE 982 Complaint)
1218	<i>Cellular Comm's. Equip. v. LG Electronics, Inc.</i> , 6:13-cv-00508 (E.D. Tex.), Dkt. 1 (CCE 508 Complaint)
1219	<i>Cellular Comm's. Equip. v. LG Electronics, Inc.</i> , 6:13-cv-00507 (E.D. Tex.), Dkt. 442-6 (CCE Infringement Contentions for U.S. Patent No. 6,819,923)
1220	<i>Cellular Comm's. Equip. v. LG Electronics, Inc.</i> , 6:14-cv-00982 (E.D. Tex.), Dkt. 147-9 (CCE Infringement Contentions for U.S. Patent No. 8,848,556)
1221	<i>Core Wireless Licensing v. LG Electronics, Inc.</i> , No. 2:14-cv-00911 (E.D. Tex.), Dkt. 1 (Core Wireless 911 Complaint)
1222	<i>Core Wireless Licensing v. LG Electronics, Inc.</i> , No. 2:14-cv-00912 (E.D. Tex.), Dkt. 1 (Core Wireless 912 Complaint)
1223	<i>Core Wireless Licensing v. LG Electronics, Inc.</i> , No. 2:14-cv-00911 (E.D. Tex.), Dkt. 13 (Core Wireless 911/912 Consolidation Order)
1224	<i>Core Wireless Licensing v. LG Electronics, Inc.</i> , No. 2:14-cv-00911 (E.D. Tex.), Dkt. 363 (Core Wireless Proposed Joint Pretrial Order)
1225	<i>Core Wireless Licensing v. LG Electronics, Inc.</i> , No. 2:14-cv-00911 (E.D. Tex.), Dkt. 232 (Core Wireless Appearance of Jamie B. Beaber)
1226	<i>Mobile Tele. Tech. v. LG Electronics, Inc.</i> , No. 2:13-cv-00947 (E.D. Tex.), Dkt. 20 (MTT Complaint)
1227	U.S. Patent No. 8,713,476
1228	U.S. Patent No. 6,978,143
1229	U.S. Patent No. 6,477,151
1230	U.S. Patent No. 8,848,556

Exhibit ("Ex.")	Description
1231	U.S. Patent No. 6,091,717
1232	U.S. Patent No. 8,055,820
1233	U.S. Patent No. 7,764,966
1234	U.S. Patent No. 7,804,850
1235	U.S. Patent No. 8,434,020
1236	U.S. Patent No. 6,094,426
1237	U.S. Patent No. 7,215,962
1238	U.S. Patent No. 5,809,428
1239	U.S. Patent No. 6,266,321
1240	U.S. Patent No. 6,778,521
1241	<i>Cellular Comm's. Equip. v. LG Electronics, Inc.</i> , 6:13-cv-00507 (E.D. Tex.), Dkt. 442-1 (CCE Infringement Contentions)
1242	<i>Mobile Tele. Tech. v. LG Electronics, Inc.</i> , No. 2:13-cv-00947 (E.D. Tex.) Docket Sheet
1243	<i>Cellular Comm's. Equip. v. LG Electronics, Inc.</i> , 6:16-cv-00365 (E.D. Tex.), Dkt. 2 (CCE 365 Complaint)
1244	<i>Cellular Comm's. Equip. v. LG Electronics, Inc.</i> , 6:13-cv-00508 (E.D. Tex.) Docket Sheet Excerpt
1245	<i>Cellular Comm's. Equip. v. LG Electronics, Inc.</i> , 6:14-cv-00982 (E.D. Tex.) Docket Sheet Excerpt
1246	<i>Cellular Comm's. Equip. v. LG Electronics, Inc.</i> , 6:16-cv-00365 (E.D. Tex.), Docket Sheet Excerpt
1247	<i>Core Wireless Licensing v. LG Electronics, Inc.</i> , No. 2:14-cv-00911 (E.D. Tex.) Docket Sheet Excerpt

Exhibit ("Ex.")	Description
1248	LGE Emails (Confidential – Privileged)
1249	<i>Jenam Tech, L.L.C. v. LG Electronics, Inc.</i> , No. 4:19-cv-00249 (E.D. Tex.), Dkt 1 (<i>Jenam</i> Complaint)
1250	<i>Jenam Tech, L.L.C. v. LG Electronics, Inc.</i> , No. 4:19-cv-00249 (E.D. Tex.) Docket Sheet Excerpt
1251	LGE-Pantech Emails from 2021-04-01 to 2021-05-06 (Translated) (Confidential)
1252	LGE-Mayer Brown Emails on 2015-06-04 (Confidential)
1253	CCE Production Metadata (Confidential)
1254	LGE-Mayer Brown Emails from 2015-09-09 to 2015-11-06 (Confidential)
1255	CCE Source Code Production Data (Confidential)
1256	LGE-Mayer Brown Emails from 2020-01-24 to 2020-01-29 (Confidential)
1257	<i>Jenam</i> Production Metadata (Confidential)
1258	<i>Pantech</i> Preliminary Infringement Contentions of U.S. Patent No. 9,575,631
1259	<i>Pantech</i> Preliminary Infringement Contentions of U.S. Patent No. 9,854,545
1260	<i>Pantech</i> Preliminary Infringement Contentions of U.S. Patent No. 9,313,809
1261	<i>Pantech</i> Preliminary Infringement Contentions of U.S. Patent No. 9,065,486
1262	<i>Pantech</i> Preliminary Infringement Contentions of U.S. Patent No. 9,136,924

Exhibit ("Ex.")	Description
1263	U.S. Patent No. 6,775,548
1264	U.S. Patent No. 5,946,320
1265	IPR2023-01271 – Request for Extension
1266	2023-12-26 Dkt. 30 Mandamus Order

Respectfully submitted,

Dated: December 27, 2023

By: /James. L. Davis, Jr./
Name: James. L. Davis, Jr.
Counsel for Petitioner
LG ELECTRONICS INC.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing PETITIONER'S UPDATED LIST OF EXHIBITS and EXHIBIT 1266 was served in its entirety by filing through the Patent Trial and Appeal Case Tracking System (P-TACTS), as well as providing a courtesy copy via e-mail to the following attorneys of record for the Patent Owner listed below:

<u>Lead Counsel</u> Amanda S. Bonner Registration No. 65,224 Mayer Brown LLP 71 S. Wacker Drive Chicago, IL 60606 Telephone: 312-782-0600 Facsimile: 312-706-8157 asbonner@mayerbrown.com <u>Pantech-LGE-</u> IPRService@mayerbrown.com	<u>Back-Up Counsel</u> James A. Fussell, III Registration No. 54,885 Clark S. Bakewell Registration No. 71,615 Baldine B. Paul Registration No. 54,369 Seth W. Bruneel Registration No. 78,973 Mayer Brown LLP 1999 K Street NW Washington, D.C. 20006 Telephone: 202-263-3000 Facsimile: 202-263-3300 jfussell@mayerbrown.com cbakewell@mayerbrown.com bpaul@mayerbrown.com sbruneel@mayerbrown.com
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Dated: December 27, 2023

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Name: Jonathan Bradford
ROPES & GRAY LLP