

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS INC.,

Petitioner,

v.

PANTECH CORPORATION,

Patent Owner.

Case IPR2023-01268

U.S. Patent No. 9,575,631

PETITIONER'S UPDATED LIST OF EXHIBITS

UPDATED LIST OF EXHIBITS

Exhibit ("Ex.")	Description
1001	U.S. Patent No. 9,575,631 ("631")
1002	File History of U.S. Patent No. 9,575,631 ("631FH")
1003	Declaration of Dr. Vijay Madiseti in support of Petition for <i>Inter Partes</i> Review of U.S. Patent No. 9,575,631
1004	(Reserved)
1005	U.S. Patent No. 9,785,329 ("Paasonen")
1006	U.S. Patent Publication No. 2004/0100479 ("Nakano")
1007	U.S. Patent Publication No. 2006/0020904 ("Aaltonen")
1008	U.S. Patent Publication No. 2005/0257169 ("Tu")
1009	U.S. Patent Publication No. 2006/0197753 ("Hotelling")
1010	U.S. Patent Provisional App. No. 60/658,777 ("Hotelling-Prov.")
1011	U.S. Patent Publication No. 2006/0026521 ("Hotelling-521")
1012	U.S. Patent Publication No. 2003/0117440 ("Hellyar")
1013	U.S. Patent Publication No. 2004/0166895 ("Koenck")
1014	U.S. Patent Publication No. 2004/0219901 ("Loke")
1015	U.S. Patent Publication No. 2002/0068558 ("Janik")
1016	U.S. Patent Publication No. 2005/0110768 ("Marriott")
1017	P.C.T. Patent App. Publication No. W.O. 2000/0065429 ("Törnqvist")
1018	U.S. Patent Publication No. 2003/0076306 ("Zadesky")
1019	U.S. Patent Publication No. 2003/0083106 ("Seo")

Exhibit ("Ex.")	Description
1020	European Patent App. Publication No. E.P. 1531607 ("Hon")
1021	U.S. Patent Publication No. 2004/0259542 ("Viitamaki")
1022	PCT Patent App. Publication No. WO2005/064441 and certified translation thereof ("Lee")
1023	U.S. Patent Publication No. 2002/0109678 ("Marmolin")
1024	U.S. Patent No. 5,715,417 ("Gardien")
1025	U.S. Patent Publication No. 2006/0101347 ("Runov")
1026	U.S. Patent Publication No. 2006/0211454 ("Park")
1027	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. Tex.), Dkt. No. 118.
1028	Docket Navigator "Time to Trial" report for Judge Robert W. Schroeder
1029	(Reserved)
1030	File History of U.S. Patent App. No. 11/495,863 ("863-App. FH")
1031	Plaintiff's Patent Rule 3-1 and 3-2 Infringement Contentions, Appendix 9: Preliminary Infringement Contentions of U.S. Patent No. 9,575,631, <i>Pantech Corp. et al. v. LG Electronics Inc. et al.</i> , Case 5:22-cv-00113-RWS-JBB (E.D. Tex.) (February 15, 2023).
1032	Claim Construction Expert Report of Charles Mauro CHFP Concerning Certain Terms of U.S. Patent Nos. 7,283,839 And 9,575,631, <i>Pantech Corp. et al. v. LG Electronics Inc. et al.</i> , Case 5:22-cv-00113-RWS-JBB (E.D. Tex.) (June 23, 2023).
1033	Redline Comparing the Text of Hotelling-Prov. and Hotelling

Exhibit ("Ex.")	Description
1034	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. Tex.), Dkt. No. 98.
1035	USCourts.gov "U.S. District Court – Judicial Caseload Profile" for Eastern District of Texas
1036- 1039	(Reserved)
1040	Declaration of Jonathan Bradford
1041	Transcript of November 1, 2023 Call with the Board
1042- 1199	(Reserved)
1200	Proposed Protective Order
1201	Declaration of Hojun Suh (Confidential)
1202	Declaration of Soo Hong (Confidential)
1203	U.S. Patent No. 9,313,809
1204	(Reserved— <i>See</i> Ex. 1001)
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)

Exhibit ("Ex.")	Description
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)
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)

Exhibit ("Ex.")	Description
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 (<i>Core Wireless</i> 911 Complaint)
1222	<i>Core Wireless Licensing v. LG Electronics, Inc.</i> , No. 2:14-cv-00912 (E.D. Tex.), Dkt. 1 (<i>Core Wireless</i> 912 Complaint)
1223	<i>Core Wireless Licensing v. LG Electronics, Inc.</i> , No. 2:14-cv-00911 (E.D. Tex.), Dkt. 13 (<i>Core Wireless</i> 911/912 Consolidation Order)
1224	<i>Core Wireless Licensing v. LG Electronics, Inc.</i> , No. 2:14-cv-00911 (E.D. Tex.), Dkt. 363 (<i>Core Wireless</i> Proposed Joint Pretrial Order)
1225	<i>Core Wireless Licensing v. LG Electronics, Inc.</i> , No. 2:14-cv-00911 (E.D. Tex.), Dkt. 232 (<i>Core Wireless</i> 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 (<i>MTT</i> 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
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

Exhibit ("Ex.")	Description
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
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

Exhibit ("Ex.")	Description
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	Jenam 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
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

Exhibit ("Ex.")	Description
1267- 1299	(Reserved)
1300	Petitioner's Offered Sotera Stipulation

Respectfully submitted,

Dated: February 21, 2024

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 1300 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:

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Dated: February 21, 2024

By: /Jonathan Bradford/
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