

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS INC.,

Petitioner,

v.

PANTECH CORPORATION,

Patent Owner.

Case IPR2023-01269

U.S. Patent No. 9,854,545

PETITIONER'S UPDATED LIST OF EXHIBITS

UPDATED LIST OF EXHIBITS

Exhibit ("Ex.")	Description
1001	U.S. Patent No. 9,854,545 ("545")
1002	File History of U.S. Application No. 14/733,068 ("545FH")
1003	Declaration of Dr. Daniel van der Weide in Support of Petition for <i>Inter Partes</i> Review of U.S. Patent No. 9,854,545 ("Weide")
1004	Declaration of Friedhelm Rodermund in Support of Petition for <i>Inter Partes</i> Review of U.S. Patent No. 9,854,545 ("Rodermund")
1005	U.S. Patent Application Publication No. 2011/0158116 ("Tenny")
1006	U.S. Provisional Application No. 61/218769 ("Tenny-Prov.")
1007	R2-100423, <i>Supporting multiple timing advance groups</i> ("Qualcomm")
1008	3GPP Technical Specification 36.300 v8.11.0 (2009-12) ("TS36.300")
1009	3GPP Technical Specification 36.331 v9.0.0 (2009-09) ("TS36.331")
1010	U.S. Patent Application Publication No. 2010/0260136 ("Fan")
1011	File History of U.S. Application No. 13/578,531 ("545 parent FH")
1012	File History of U.S. Application No. 12/818,064 ("Tenny FH")
1013	U.S. Patent Application Publication No. 2012/0008600 ("Marinier")
1014	U.S. Provisional Application No. 61/293,271 ("Marinier-Prov.")
1015	3G Evolution: HSPA and LTE for Mobile Broadband (Second Edition, 2008)
1016	Claim Construction Expert Report of Peter Rysavy Concerning U.S. Patent No. 9,854,545, <i>Pantech Corp. et al. v. LG Electronics Inc. et al.</i> , Case 5:22-cv-00113-RWS-JBB (E.D. Texas) (June 23, 2023)

Exhibit ("Ex.")	Description
1017	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
1018	Plaintiffs' preliminary proposed constructions and supporting extrinsic evidence pursuant to P.R. 4-2 (dated June 2, 2023)
1019	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
1020	Docket Navigator "Time to Trial" report for Judge Robert W. Schroeder
1021	USCourts.gov "U.S. District Court – Judicial Caseload Profile" for Eastern District of Texas
1022	Transcript of Peter Rysavy, <i>Pantech Corp. et al. v. LG Electronics Inc. et al.</i> , Case 5:22-cv-00113-RWS-JBB (E.D. Texas) (July 12, 2023)
1023	Declaration of Jonathan Bradford in Support of Petition for <i>Inter Partes</i> Review of United States Patent No. 9,854,545
1024-50	[Reserved]
1051	Webpage, available at https://archive.org/legal/affidavit.php
1052	Internet Archive Capture, available at https://web.archive.org/web/20110509054716/http://3gpp.org/Specification-Groups
1053	Internet Archive Capture, available at https://web.archive.org/web/20090802220720/http://www.3gpp.org/
1054	Internet Archive Capture, available at https://web.archive.org/web/20130812133550/http://3gpp.org/RAN2-Radio-layer-2-and-Radio-layer

Exhibit ("Ex.")	Description
1055	Internet Archive Capture, available at https://web.archive.org/web/20081008035555/http://www.3gpp.org/ftp/tsg_ran/WG2_RL2
1056	Internet Archive Capture, available at https://web.archive.org/web/20080517151142/http://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_50/
1057	Webpage, available at ftp.3gpp.org/Specs
1058	Internet Archive Capture, available at https://web.archive.org/web/20130110164645/http://www.3gpp.org/specifications
1059	Internet Archive Capture, available at https://web.archive.org/web/20081201021150/http://www.3gpp.org/Specification-Numbering
1060	Internet Archive Capture, available at https://web.archive.org/web/20081207063329/http://www.3gpp.org/ftp/Specs/html-info/36-series.htm
1061	Internet Archive Capture, available at https://web.archive.org/web/20080513144118/http://www.3gpp.org/ftp/Specs/html-info/TSG-WG--R2.htm
1062	Internet Archive Capture, available at https://web.archive.org/web/20081201154548/http://www.3gpp.org/ftp/specs/html-info/36300.htm
1063	Internet Archive Capture, available at https://web.archive.org/web/20140326141918/http://3gpp.org/DynaReport/TSG-WG--R2.htm
1064	Internet Archive Capture, available at https://web.archive.org/web/20140217112636/http://www.3gpp.org/DynaReport/36-series.htm

Exhibit ("Ex.")	Description
1065	Internet Archive Capture, available at https://web.archive.org/web/20140228134853/http://www.3gpp.org/DynaReport/36300.htm
1066	[Reserved]
1067	3GPP TS 36.300 V8.6.0 (2008-09), retrieved from https://web.archive.org/web/20140704112512/http://www.3gpp.org/ftp/Specs/archive/36_series/36.300/36300-860.zip (36300-860.doc in 36300-860.zip)
1068	Internet Archive Capture, available at https://web.archive.org/web/20081013132816/http://www.3gpp.org/ftp/Specs/latest/Rel-8/
1069	Internet Archive Capture, available at https://web.archive.org/web/20080924051314/http://www.3gpp.org/ftp/Specs/latest/Rel-8/36_series/
1070	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
1071	Webpage, available at https://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_68bis/Docs
1072	R2-100423, retrieved from https://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_68bis/Docs/R2-100423.zip (R2-100423 Supporting multiple timing advance groups.doc in R2-100423.zip)
1073	RAN WG2 #68bis skeleton report based on Agenda Proposal from 3GPP TSG RAN WG2 #68bis meeting on 18 - 22 January, Valencia, Spain (R2-10xxxx), retrieved from https://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_68bis/Report/History/skeleton_report_RAN2_68bis_update.zip (skeleton_report_RAN2_68bis_update.doc in skeleton_report_RAN2_68bis_update.zip)

Exhibit ("Ex.")	Description
1074	Webpage, available at https://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_68bis/Report/History/
1075	Webpage, available at https://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_68bis/Report/
1076	R2-101881, retrieved from https://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_68bis/Report/R2-101881.zip (101881_report_RAN2_68bis_Valencia.doc in R2-101881 - R2.zip)
1077	Excel file "Tdoc_List_RAN2_68bis_100221.xls," retrieved from https://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_68bis/Report/R2-101881.zip
1078	Webpage, available at https://list.etsi.org/scripts/wa.exe?A2=3GPP_TSG_RAN_WG2;758681ee.1001
1079	Internet Archive Capture, available at https://web.archive.org/web/20091210102659/http://list.etsi.org:80/
1080	Internet Archive Capture, available at https://web.archive.org/web/20100115152457/http://list.etsi.org/
1081	Excel file "Participants_list_RAN2_68bis.xls," retrieved from https://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_68bis/Report/R2-101881.zip (participants_list_RAN2_68bis.xls in R2-101881.zip)
1082	Webpage, available at https://www.3gpp.org/ftp/Specs/archive/36_series/36.300
1083	Webpage, available at https://www.etsi.org/deliver/etsi_ts/136300_136399/136300/08.11.00_60/

Exhibit ("Ex.")	Description
1084	ETSI TS 136 300 V8.11.0 (2010-02), retrieved from https://www.etsi.org/deliver/etsi_ts/136300_136399/136300/08.11.00_60/ts_136300v081100p.pdf
1085	Internet Archive Capture, available at https://web.archive.org/web/20131115195236/http://webapp.etsi.org/key/key.asp?full_list=y
1086	Internet Archive Capture, available at https://web.archive.org/web/20081211052818/http://www.3gpp.org/ftp/Specs/archive/36_series/36.300/
1087	Internet Archive Capture, available at https://web.archive.org/web/20140714052548/http://3gpp.org/ftp/specs/archive/36_series/36.300
1088	Internet Archive Capture, available at https://web.archive.org/web/20150226191038/http://www.3gpp.org:80/ftp/Specs/archive/36_series/36.300
1089	3GPP TS 36.300 V8.11.0 (2009-12), retrieved from https://www.3gpp.org/ftp/Specs/archive/36_series/36.300/36300-8b0.zip (36300-8b0.doc in 36300-8b0.zip)
1090	[Reserved]
1091	Internet Archive Capture, available at https://web.archive.org/web/20081113150830/http://www.3gpp.org/ftp/Specs/
1092	Internet Archive Capture, available at https://web.archive.org/web/20081013132648/http://www.3gpp.org/ftp/Specs/archive
1093	Internet Archive Capture, available at https://web.archive.org/web/20081012223857/http://www.3gpp.org/ftp/specs/archive/36_series/

Exhibit ("Ex.")	Description
1094	Internet Archive Capture, available at https://web.archive.org/web/20081201231313/http://www.3gpp.org/ftp/Specs/latest
1095	Internet Archive Capture, available at https://web.archive.org/web/20081208085335/http://www.3gpp.org:80/ftp/Specs/latest/Rel-8/
1096	Internet Archive Capture, available at https://web.archive.org/web/20081209045248/http://www.3gpp.org/ftp/Specs/latest/Rel-8/36_series/
1097	Webpage, available at https://www.3gpp.org/ftp/Specs/archive/36_series/36.331/
1098	Webpage, available at https://www.etsi.org/deliver/etsi_ts/136300_136399/136331/09.00.00_60/
1099	ETSI TS 136 331 V9.0.0 (2009-10), retrieved from https://www.etsi.org/deliver/etsi_ts/136300_136399/136331/09.00.00_60/ts_136331v090000p.pdf
1100	Internet Archive Capture, available at https://web.archive.org/web/20081108042545/http://www.3gpp.org/Specifications
1101	Internet Archive Capture, available at https://web.archive.org/web/20081201131034/http://www.3gpp.org/ftp/specs/archive/36_series/36.331/
1102	Internet Archive Capture, available at https://web.archive.org/web/20140713200444/http://3gpp.org/ftp/specs/archive/36_series/36.331/
1103	3GPP TS 36.331 V9.0.0 (2009-09), retrieved from https://www.3gpp.org/ftp/Specs/archive/36_series/36.331/36331-900.zip (36331-900.doc in 36331-900.zip)

Exhibit ("Ex.")	Description
1104	Internet Archive Capture, available at https://web.archive.org/web/20081201163652/http://www.3gpp.org/ftp/specs/html-info/36331.htm
1105	Internet Archive Capture, available at https://web.archive.org/web/20140326134320/http://3gpp.org/DynaReport/36331.htm
1106	Internet Archive Capture, available at https://web.archive.org/web/20140621152924/http://www.3gpp.org:80/ftp/specs/archive/36_series/36.331
1107	Internet Archive Capture, available at https://web.archive.org/web/20130110164713/http://www.3gpp.org/ftp/Specs/
1108	Transcript of November 1, 2023 Call with the Board
1109-1199	(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	U.S. Patent No. 9,575,631
1205	(Reserved—See Ex. 1001)
1206	U.S. Patent No. 10,869,247
1207	U.S. Patent No. 9,065,486
1208	U.S. Patent No. 9,136,924

Exhibit ("Ex.")	Description
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)
1217	<i>Cellular Comm's. Equip. v. LG Electronics, Inc.</i> , 6:14-cv-00982 (E.D. Tex.), Dkt. 1 (<i>CCE</i> 982 Complaint)
1218	<i>Cellular Comm's. Equip. v. LG Electronics, Inc.</i> , 6:13-cv-00508 (E.D. Tex.), Dkt. 1 (<i>CCE</i> 508 Complaint)

Exhibit ("Ex.")	Description
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 (<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

Exhibit ("Ex.")	Description
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
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)

Exhibit ("Ex.")	Description
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
1263	U.S. Patent No. 6,775,548
1264	U.S. Patent No. 5,946,320
1265	IPR2023-01271 – Request for Extension

Exhibit ("Ex.")	Description
1266	2023-12-26 Dkt. 30 Mandamus Order
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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ROPES & GRAY LLP