

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MOTOROLA SOLUTIONS, INC.,

Petitioner,

v.

STA GROUP LLC,

Patent Owner.

Case No. IPR2023-01292

U.S. Patent No.: 7,324,802

PETITIONER'S UPDATED EXHIBIT LIST

Submitted Electronically

PETITIONER'S EXHIBIT LIST

EXHIBIT	Description of Documents
1001	U.S. Patent No. 7,324,802 (“’802 Patent”)
1002	Declaration of David H. Williams dated Aug. 21, 2023
1003	File History of the ’802 Patent
1004	U.S. Patent Publication No. 2004/0117859 A1 to Hagai Ohel, entitled “Multiple Channel Data Recorder and Method for Recording Data on Multiple Channels” (filed Dec. 16, 2002, and published June 17, 2004) (“Ohel”)
1005	Federal Communications Commission, Report and Order and Further Notice of Proposed Rule Making, FCC 94-288 (December 9, 1994) (“FCC”)
1006	U.S. Patent Publication No. 2003/0228863 A1 to Raymond Vander Veen et al., entitled “Voicemail User Interface Methods and Apparatus for Reliable Mobile Communication Devices” (filed June 6, 2003, and issued Dec. 11, 2003) (“Vander Veen”)
1007	U.S. Patent No. 4,914,705 to Seiitsu Nigawara, entitled “Voice Message Announcing Method and System for Plant” (filed Sep. 3, 1987, and issued Apr. 3, 1990) (“Nigawara”)
1008	U.S. Patent Publication No. 2006/0176169 A1 to David M. Doolin, et al., entitled “System for Sensing Environmental Conditions” (filed Dec. 16, 2005, with priority to a provisional application filed Dec. 17, 2004, and published Aug. 10, 2006) (“Doolin”)
1009	U.S. Provisional Patent Appl. No. 60/637,279 to Doolin et al. (“Doolin Provisional”)
1010	File History of U.S. Patent Application Publication No. 2006/0176169 A1 to Doolin et al.
1011	Letter from James Shimota, Partner, K&L Gates to Natalie Gonzales, Partner, Baker Botts L.L.P., RE: Plaintiff’s Infringement Contentions (Mar. 30, 2023)
1012	U.S. Patent Publication No. 2005/0215229 A1 to Steven D. Cheng, entitled “Call Processing System” (filed Mar. 26, 2004, and published Sep. 29, 2005) (“Cheng”)

EXHIBIT	Description of Documents
1013	New York Radio Frequencies (June 6, 2002), (https://web.archive.org/web/20020606155134/https://thushara.com/new-york-radio-frequencies.htm)
1014	U.S. Patent Publication No. 2003/0063714 A1 to Peggy M. Stumer et al., entitled “Internet Protocol (IP) Emergency Connections (ITEC) Telephony” (filed Sep. 26, 2001, and published Apr. 3, 2003) (“ Stumer ”)
1015	Ericsson, <i>Maintenance Manual, EDACS ® C3 MaestroTM Console System with Enhanced Audio Enclosure</i> (March 1995) (“ C3 Manual ”)
1016	U.S. Patent No. 3,133,995 to Alfred Zarouni, entitled “Call Awaiting Signal Telephone Circuits” (filed Sep. 18, 1961, and issued May 19, 1964) (“ Zarouni ”)
1017	U.S. Patent No. 5,134,652 to Allan G. Brown et al., entitled “Communication Console Station with Priority Queuing” (filed Aug. 23, 1991, and issued Jul. 28, 1992) (“ Brown ”)
1018	Motorola Inc., <i>CENTRACOM Gold Series Classic CRT User’s Guide</i> (1998) (“ CENTRACOM ”)
1019	U.S. Patent No. 4,959,648 to Robert L. Breeden, et al., entitled “Dual Dynamic Priority Control in a Selective Call System” (filed Feb. 10, 1989, and issued Sep. 25, 1990) (“ Breeden ”)
1020	U.S. Patent Publication No. 2002/0080928 A1 to Cary Lee Bates et al., entitled “Telephone Message System with Flexible Presentation Capability” (filed Dec. 22, 2000, and published Jun. 27, 2002) (“ Bates ”)
1021	U.S. Patent No. 2,800,530 to Harry R. Van Deventer et al., entitled “Telephone Answering and Recording Devices” (filed Dec. 17, 1949, and issued July 23, 1957) (“ Van Deventer ”)
1022	Plaintiff’s First Amended Disclosure of Asserted Claims and Infringement Contentions and Document Production Accompanying Disclosure Pursuant to P.R. 3-1 & 3-2, No. 2:22-CV-0381-JRG-RSP (E.D. Tex. June 15, 2023).

EXHIBIT	Description of Documents
1023	Katherine K. Vidal, <i>Memorandum: Interim Procedure for Discretionary Denials in AIA Post-Grant Proceedings with Parallel District Court Litigation</i> (June 21, 2022)
1024	Docket Control Order, <i>STA Group LLC v. Motorola Solutions, Inc.</i> , No. 2:22-CV-0381-JRG-RSP, Dkt. 35 (E.D. Tex. Feb. 3, 2023)
1025	Telex Communications, Inc. and Vega Signaling Products, Price List (effective Apr. 1, 2003), (https://web.archive.org/web/20030401105942/http://vega-signaling.com/) (“ C-Soft Price List ”)
1026	<i>Motorola Annual Report 1975</i> (1975) (“ 1975 Report ”)
1027	Parties’ Local P.R. 4-2 Disclosure of Preliminary Proposed Constructions of Claim Terms and Preliminary Identification of Extrinsic Evidence
1028	Amended Docket Control Order, <i>STA Group LLC v. Motorola Solutions, Inc.</i> , No. 2:22-CV-0381-JRG-RSP, Dkt. 196 (E.D. Tex. Dec. 1, 2023)
1029	Email from Katharine.Burke@BakerBotts.com (Dec. 27, 2023)
1030	Default Protective Order
1031	<i>Locality</i> , Merriam-Webster Dictionary (2024) (https://www.merriam-webster.com/dictionary/locality , last accessed Sep. 16, 2024).
1032	<i>Locality</i> , Random House Webster’s Unabridged Dictionary (2nd ed. 2001).
1033	Transcript of Deposition of Dr. Robert Akl (Sep. 13, 2024)
1034	Supplemental Claim Construction Order, <i>STA Group LLC v. Motorola Solutions, Inc.</i> , No. 2:22-CV-0381-JRG-RSP, Dkt. 367 (E.D. Tex. June 4, 2024).
1035	Expert Report of Dr. Robert Akl, D.SC. Regarding Infringement of U.S. Patent No. 7,324,802, <i>STA Group LLC v. Motorola Solutions, Inc.</i> , No. 2:22-CV-0381-JRG-RSP (E.D. Tex. May 10, 2024).
1036	Petitioner’s Demonstratives for Oral Argument

December 6, 2024

Respectfully Submitted,

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CERTIFICATE OF SERVICE

In accordance with 37 C.F.R. § 42.6(e), the undersigned certifies that on December 6, 2024, a complete and entire copy of the **PETITIONER'S UPDATED EXHIBIT LIST** and Exhibit 1036 were served on Patent Owner via email at the following correspondence addresses:

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