

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

CARBYNE BIOMETRICS, LLC,
Patent Owner

Case No. IPR2024-00334
Patent No. 11,514,138

PATENT OWNER'S UPDATED EXHIBIT LIST

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Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

TABLE OF EXHIBITS

Exhibit	Description
2001	<i>Carbyne Biometrics, LLC v. Apple Inc.</i> , Case No. 1:23-cv-00324, Dkt 14 (Defendant's Rule 12(b)(6) Motion to Dismiss the Complaint for Failure to State a Claim Under 35 U.S.C. §101) (W.D. Tex. May 24, 2023)
2002	<i>Carbyne Biometrics, LLC v. Apple Inc.</i> , Case No. 1:23-cv-00324, Dkt 30 (Plaintiff's Response to Defendant's Rule 12(b)(6) Motion to Dismiss the Complaint for Failure to State a Claim Under 35 U.S.C. §101) (W.D. Tex. June 1, 2023)
2003	<i>Carbyne Biometrics, LLC v. Apple Inc.</i> , Case No. 1:23-cv-00324, Dkt 31 (Defendant's Reply Brief In Support of Motion to Dismiss for Failure to State Claim Under 35 U.S.C. §101) (W.D. Tex. June 28, 2023).
2004	<i>Carbyne Biometrics, LLC v. Apple Inc.</i> , Case No. 1:23-cv-00324, Dkt 64 (Defendant's Opposed Motion to Stay Pending Transfer) (W.D. Tex. November 28, 2023)
2005	<i>Carbyne Biometrics, LLC v. Apple Inc.</i> , Case No. 1:23-cv-00324, Dkt 37 (Defendant's Opposed Motion to Transfer (redacted)) (W.D. Tex. July 26, 2023)
2006	<i>Carbyne Biometrics, LLC v. Apple Inc.</i> , Case No. 1:23-cv-00324, Dkt 66 (Carbyne's Response to Motion to Stay Pending Transfer) (W.D. Tex. December 5, 2023)
2007	<i>Carbyne Biometrics, LLC v. Apple Inc.</i> , Case No. 1:23-cv-00324, Dkt 50 (Carbyne's Response to Motion to Transfer Venue) (W.D. Tex. October 27, 2023)

2008	<i>Carbyne Biometrics, LLC v. Apple Inc.</i> , Case No. 1:23-cv-00324, Dkt 55 (Apple's Reply In Support of Its Motion to Transfer Venue) (W.D. Tex. November 10, 2023)
2009	<i>Carbyne Biometrics, LLC v. Apple Inc.</i> , Case No. 1:23-cv-00324, Dkt 60 (Carbyne's Surreply in Response to Motion to Transfer Venue) (W.D. Tex. November 16, 2023)
2010	<i>Carbyne Biometrics, LLC v. Apple Inc.</i> , Case No. 1:23-cv-00324, Dkt 42 (Apple's Opening Claim Construction Brief) (W.D. Tex. October 4, 2023)
2011	<i>Carbyne Biometrics, LLC v. Apple Inc.</i> , Case No. 1:23-cv-00324, Dkt 49 (Carbyne's Response to Apple's Proposed Claim Construction) (W.D. Tex. October 25, 2023)
2012	<i>Carbyne Biometrics, LLC v. Apple Inc.</i> , Case No. 1:23-cv-00324, Dkt 54 (Apple's Reply Claim Construction Brief) (W.D. Tex. November 8, 2023)
2013	<i>Carbyne Biometrics, LLC v. Apple Inc.</i> , Case No. 1:23-cv-00324, Dkt 62 (Carbyne's Sur-Reply to Apple's Claim Construction Brief) (W.D. Tex. November 22, 2023)
2014	<i>Carbyne Biometrics, LLC v. Apple Inc.</i> , Case No. 1:23-cv-00324, Dkt 69 (Minute Entry re Markman Hearing and Motion to Transfer Venue) (W.D. Tex. December 12, 2023)
2015	<i>Carbyne Biometrics, LLC v. Apple Inc.</i> , Case No. 1:23-cv-00324, Dkt 73 (Apple's Motion to Stay Pending The Court's Written Order on Transfer) (W.D. Tex. January 17, 2024)
2016	<i>Carbyne Biometrics, LLC v. Apple Inc.</i> , Case No. 1:23-cv-00324, Dkt 79 (Carbyne's Response to Motion to Stay Pending Written Order on Transfer) (W.D. Tex. January 24, 2024)
2017	<i>Carbyne Biometrics, LLC v. Apple Inc.</i> , Case No. 1:23-cv-00324, Dkt 80 (Apple's Reply in Support of Motion to Stay Pending Court's Written Order on Transfer) (W.D. Tex. January 24, 2024)

2018	<i>In Re Apple</i> , Case No. 2024-111, Dkt 2 (Apple’s Petition for Writ of Mandamus) (Fed. Cir. February 1, 2024)
2019	<i>In Re Apple</i> , Case No. 2024-111, Dkt. 13 (Carbyne’s Response to Writ of Mandamus) (Fed. Cir. February 20, 2024)
2020	<i>In Re Apple Inc.</i> , Case No. 2024-111, Dkt 15 (Apple’s Reply In Support of Petition for Writ of Mandamus (Fed. Cir. February 27, 2024)
2021	<i>In Re Apple Inc.</i> , Case No. 2024-111, Dkt 18 (Order Denying Writ of Mandamus) (Fed. Cir., March 18, 2024)
2022	United States Patent and Trademark Office Memorandum Dated June 21, 2022 re: Interim Procedure for Discretionary Denials in AIA post-grant proceedings with Parallel District Court Litigation
2023	<i>Cloud of Change, LLC v. Lightspeed POS Inc.</i> , Case NO. 6:21-cv-0102 Order Denying Lightspeed POS Inc’s Opposed Motion to Stay Pending Resolution of <i>Inter Partes</i> Review (W.D. Tex. Dated May 15, 2023)
2024	<i>Sonrai Memory Limited v. LG Electronics, Inc.</i> 2022 WL 2307475 (W.D. Tex. June 27, 2022)
2025	<i>Carbyne Biometrics, LLC v. Apple Inc.</i> , Case No. 1:23-cv-00324, Apple’s Amended Preliminary Invalidity Contentions (W.D. Tex. October 6, 2023)
2026	<i>Intentionally Omitted</i>
2027	U.S. Patent No. 11,841,929
2028	U.S. Patent No. 11,475,105
2029	U.S. Patent No. 11,556,617
2030	U.S. Patent Application 2011/0138450 (“Kesanupalli ’450”)
2031	U.S. Patent No. 7,780,080 (“Owen”)
2032	<i>Intentionally Omitted</i>

2033	<i>Intentionally Omitted</i>
2034	<i>Intentionally Omitted</i>
2035	Email Correspondence From Counsel Of Petitioner To Counsel of Patent Owner re <i>Sotera</i> Stipulations and <i>Carbyne Biometrics, LLC v. Apple Inc.</i> , 1:23-cv-00032 (W.D. Tex.)
2036	Email Correspondence From Counsel Of Petitioner To The Board re <i>Sotera</i> Stipulations for IPRs IPR2024-00329, -00330, -00331, -00332, -00333, -00334 and-00507
2037	Declaration of Dr. Michael Goodrich
2038	CV of Dr. Michael Goodrich
2039	FIDO Presentation of Ramesh Kesanupalli
2040	PUBLIC Excerpts of the deposition transcript of Mr. Michael Barrett
2041	David Challener & Will Arthur, A Practical Guide to TPM 2.0 (Apress 2015)
2042	David C. Challener & J. D. Osborn, Trusted Platform Module Evolution (2015)
2043	Rachna Dhamija, J.D. Tygar & Marti Hearst, Why Phishing Works, in Proceedings of the SIGCHI Conference on Human Factors in Computing Systems (CHI '06) 581 (2006), https://doi.org/10.1145/1124772.1124861 .
2044	S Sinclair, SW Smith, The TIPPI point: Toward trustworthy interfaces, IEEE Security & Privacy 3 (4), 68-71, 2005
2045	Ramesh Kesanupalli, LinkedIn Profile, https://www.linkedin.com/in/ramesh-kesanupalli-22b73/ (accessed Oct. 5, 2024)

2046	Dave Challener, LinkedIn Profile, https://www.linkedin.com/in/dave-challener-bbab7b/ (accessed Oct. 5, 2024)
2047	Nok Nok, About, https://noknok.com/about/ (accessed Oct. 5, 2024)
2048	Ramesh Kesanupalli, Team, Nok Nok, https://noknok.com/about/team/ramesh-kesanupalli/ (accessed Oct. 5, 2024)
2049	Federal Trade Commission, How to Recognize and Avoid Phishing Scams, https://consumer.ftc.gov/articles/how-recognize-and-avoid-phishing-scams (accessed Oct. 5, 2024)
2050	Microsoft, Introduction to Windows Biometric Framework, https://download.microsoft.com/download/9/c/5/9c5b2167-8017-4bae-9fde-d599bac8184a/wbfintro.docx (accessed Oct. 5, 2024)
2051	ISO/IEC 11889-1:2009, Information Technology — Trusted Platform Module — Part 1: Architecture (2009).
2052	Deposition transcript of Dr. McDaniel
2053	Excerpts from Deposition transcript of Dr. Nielson
2054	Patent Owner's Demonstratives

Dated: April 11, 2025

Respectfully submitted,

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that a copy of this **PATENT OWNER'S UPDATED EXHIBIT LIST** has been served on Petitioner via email on the following counsel of record for Petitioner:

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