

Filed on behalf of: Serendia, LLC

Entered: December 18, 2024

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JEISYS MEDICAL INC.,
Petitioner,

v.

SERENDIA, LLC,
Patent Owner.

Case IPR2024-00386
Patent 9,480,836

PATENT OWNER'S UPDATED EXHIBIT LIST

Pursuant to 37 C.F.R. § 42.63(e), Patent Owner Serendia, LLC respectfully submits the following current exhibit list:

Exhibit	Description
2001	[Proposed] Stipulated Protective Order
2002	Markup Comparison Showing Differences Between the [Proposed] Stipulated Protective Order and the Default Protective Order
2003	Complainant's July 24, 2023 Supplemental Validity Contentions, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. July 24, 2023) (PROTECTIVE ORDER MATERIAL AND REDACTED VERSIONS)
2004	Expert Report of Jean Woloszko, M.D., Ph.D., dated August 14, 2023 (PROTECTIVE ORDER MATERIAL AND REDACTED VERSIONS)
2005	Rebuttal Expert Report of Daniel W. van der Weide, dated August 28, 2023 (PROTECTIVE ORDER MATERIAL)
2006	Rebuttal Expert Report of David Goldberg, M.D., J.D., dated August 28, 2023 (PROTECTIVE ORDER MATERIAL)
2007	Deposition transcript of Jean Woloszko, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), taken September 14, 2023 (excerpt)
2008	Deposition transcript of Jean Woloszko, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), taken September 15, 2023 (excerpt)
2009	Deposition transcript of Daniel W. van der Weide, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), taken August 31, 2023 (excerpt)

Exhibit	Description
2010	Deposition transcript of Daniel W. van der Weide, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), taken September 1, 2023 (excerpt)
2011	Deposition transcript of David J. Goldberg, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), taken September 15, 2023 (excerpt)
2012	Hearing transcript, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), held November 7, 2023 (Jean Woloszko testimony excerpts) (“Woloszko Hr’g Tr.”)
2013	Hearing transcript, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), held December 12, 2023 (Daniel van der Weide testimony excerpts) (“VDW Hr’g Tr.”)
2014	Hearing transcript, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), held December 11, 2023 (David Goldberg testimony excerpts) (“Goldberg Hr’g Tr.”)
2015	Complainant’s Rebuttal Post-Hearing Brief, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. Jan. 5, 2024) (PROTECTIVE ORDER MATERIAL)
2016	Complainant’s Public Interest Statement & Complaint of Serendia, LLC, Under Section 337 of the Tariff Action of 1930, as Amended, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. Mar. 1, 2023)
2017	Parties’ Proposed Procedural Schedule and Notice of USPTO/PTO Proceedings and State and Federal Litigation Pursuant to Order No. 3, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. Apr. 24, 2023)

Exhibit	Description
2018	Order No. 6: Adopted Procedural Schedule, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. Apr. 27, 2023)
2019	Respondents' Joint Reply Post-Hearing Brief, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. Jan. 5, 2024) (excerpts)
2020	Response of Ilooda to the Complaint and Notice of Investigation, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. May 1, 2023)
2021	Jeisys Medical Inc.'s and Cynosure, LLC's Response to the Complaint and Notice of Investigation, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. May 1, 2023)
2022	Letter from Merle W. Richman, CKR Law, to Justin S. Cohen, Thompson & Knight LLP, Cutera, dated March 20, 2018
2023	Letter from Keith K. Im, SynKloud Technologies, LLC, to Todd Tillemans, Cynosure, LLC, dated Nov. 29, 2021
2024	Order No. 33: Granting Parties' Joint Motion to Amend the Amended Procedural Schedule [Motion Docket No. 1356-027], <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. Oct. 19, 2023)
2025	Exhibit A-02: Invalidity Claim Chart, U.S. Patent No. 9,480,836, Respondents' Invalidity Contentions, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. May 24, 2023)
2026	U.S. Patent No. 6,766,202 B2
2027	U.S. Patent No. 9,095,358 B2
2028	U.S. Patent No. 8,012,153 B2
2029	RESERVED

Exhibit	Description
2030	Declaration of Daniel W. van der Weide, dated April 23, 2024 (“VDW POPR Decl.”) (PROTECTIVE ORDER MATERIAL AND REDACTED VERSIONS)
2031	Declaration of David J. Goldberg, dated April 20, 2024 (“Goldberg POPR Decl.”) (PROTECTIVE ORDER MATERIAL AND REDACTED VERSIONS)
2032	Jongju Na et al., <i>Electromagnetic Initiation and Propagation of Bipolar Radiofrequency Tissue Reactions via Invasive Non-Insulated Microneedle Electrodes</i> , 5 NATURE SCI. REPS. 16735 (2015)
2033	Hearing transcript, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), held December 11, 2023 (Dany Bérubé testimony excerpts) (“Bérubé Hr’g. Tr.”)
2034	U.S. Patent Application Publication No. 2011/0288543 A1 (“Cheng”)
2035	Deposition transcript of Jongju Na, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), taken July 24, 2023 (“Na Dep. Tr.”) (excerpts)
2036	Letter from Long H. Chen-S, FDA, to Lisa Pritchard, Galvanize Therapeutics, dated June 17, 2022
2037	Brochure: Sylfirm X Dual Wave RF Microneedling System (2022) (“Brochure”)
2038	ViOL Patent List (Dec. 1, 2023), https://violmedical.com/about/patent
2039	Sylfirm X Video
2040	Transcript of Exhibit 2039 – Sylfirm X Video
2041	RESERVED

Exhibit	Description
2042	Kevin A. Wilson, <i>Leading Regenerative Therapies Creating a Paradigm Shift in Aesthetic Medicine</i> , Aesthetic Guide 3–9 (Mar./Apr. 2022)
2043	Sylfirm X testimonials
2044	ViOL, Sylfirm X Clinical Paper Summary (updated Jan. 2022)
2045	S.B. Cho et al., In Vivo Skin Reactions from Pulsed-Type, Bipolar, Alternating Current Radiofrequency Treatment Using Invasive Noninsulated Electrodes, SKIN RSCH. TECH. 1–8 (2018) (“Cho Study”)
2046	You Jin Jung et al., Therapeutic Effects of a New Invasive Pulsed-Type Bipolar Radiofrequency for Facial Erythema Associated with Acne Vulgaris and Rosacea, J. COSM. LASER THERAPY 1–5 (2021) (“Jung Study”)
2047	Shaun Wootten et al., An Evaluation of Electrocoagulation and Thermal Diffusion Following Radiofrequency Microneedling Using an In Vivo Porcine Skin Model, J. COSM. DERM. 1–7 (2020) (“Wootten Study”)
2048	Yoram Harth et al., <i>Depressed Acne Scars—Effective, Minimal Downtime Treatment with a Novel Smooth Motion Non-Insulated Microneedle Radiofrequency Technology</i> , 4 J. COSM. DERM. SCIS. APPLS. 212 (2014) (“Harth Study”)
2049	U.S. Patent No. 9,510,899 B2 (“Manstein ’899”)
2050	U.S. Patent No. 6,770,071 B2 (“Woloszko ’071”)
2051	U.S. Patent Application Publication No. 2008/0082090 A1 (“Manstein 090”)
2052	Email exchanges between SynKloud and Jeisys, transmitted December 6, 2021 through January 20, 2022, and Certified English Translations thereof (PROTECTIVE ORDER MATERIAL)

Exhibit	Description
2053	Respondents' Notice of Prior Art, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. May 24, 2023) ("1356 Investigation NOPA")
2054	Complainant's Initial Validity Contentions, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. June 16, 2023) (PROTECTIVE ORDER MATERIAL)
2055	<i>Curriculum Vitae</i> of David J. Goldberg, M.D., J.D.
2056	Hee Kyung Kim et al., <i>Immediate and Late Effects of Pulse Widths and Cycles on Bipolar, and Gated Radiofrequency-Induced Reactions in In Vivo Rat Skin</i> , 16 CLINICAL COSM. INVESTIGATIONAL DERM. 721 (2023)
2057	S. Tyler Hollmig & Basil M. Hantash, <i>Radiofrequency in Cosmetic Dermatology, Recent & Future Developments</i> , 24 COSM. DERM. 565 (2011)
2058	U.S. Patent No. 8,142,426 B2 ("Knopp '426")
2059	RESERVED
2060	Dany Berube et al., <i>A Predictive Model of Minimally Invasive Bipolar Fractional Radiofrequency Skin Treatment</i> , 41 LASERS SURG. MED. 473–478 (2009)
2061	Exclusive Distribution and License Agreement between ViOL Co., Ltd. and Serendia LLC, dated February 7, 2018 (PROTECTIVE ORDER MATERIAL)
2062	Presentation: Sylfirm X Clinical Training (2021) (PROTECTIVE ORDER MATERIAL)
2063	Sylfirm Video2
2064	Transcript of Exhibit 2063 - Sylfirm Video2

Exhibit	Description
2065	Presentation: Koh Seikoh, <i>Skin Rejuvenation Treatment of Asian Skin Using Pulse Oscillation Needle RF</i> , 38TH ANN. MTG. JAP. SOC'Y AESTHETIC DERM. (Sept. 13, 2020) (PROTECTIVE ORDER MATERIAL)
2066	Martin Braun, Sylfirm X Revolutionises [sic] the Clinical Applications of RF Microneedling, 12 PRIME INT'L J. AESTHETIC ANTI-AGEING [SIC] MED. 50 (2022)
2067	World-Class Product of Korea 2020, Certificate to ViOL Co., Ltd., dated December 9, 2020 ("Sylfirm X Award")
2068	RESERVED
2069	Baze Mpinja, <i>A New Filler for Laugh Lines & More Procedures That Are Safe for Dark Skin</i> , ALLURE (Mar. 20, 2023), https://www.allure.com/story/inclusive-skin-procedures
2070	<i>Curriculum Vitae</i> of Vincent A. Thomas
2071	Profit & Loss, January–December 2021 (Accrual Basis) (July 6, 2023, 2:31 PM) (PROTECTIVE ORDER MATERIAL)
2072	<i>Curriculum Vitae</i> of Daniel W. van der Weide
2073	Christopher L. Brace et al., <i>Microwave Ablation with a Triaxial Antenna: Results in Ex Vivo Bovine Liver</i> , 53 IEEE TRANSACTIONS MICROWAVE THEORY TECHS. 215 (2005)
2074	Dieter Haemmerich et al., <i>Finite-Element Analysis of Hepatic Multiple Probe Radio-Frequency Ablation</i> , 49 IEEE TRANSACTIONS BIOMED. ENG'G 836 (2002)
2075	Luca Zilberti, <i>Charge Relaxation in Biological Tissues with Extremely High Permittivity</i> , 7 IEEE MAGNETICS LETTERS 1 (2016)

Exhibit	Description
2076	Int'l Electrotechnical Comm'n Int'l Standard, <i>Medical Electrical Equipment - Part 2-2: Particular Requirements for the Basic Safety and Essential Performance of High Frequency Surgical Equipment and High Frequency Surgical Accessories</i> (IEC 60601-2-2) (6.0 ed. Mar. 2017)
2077	Int'l Electrotechnical Comm'n Int'l Standard, <i>Medical Electrical Equipment - Part 2-2: Particular Requirements for the Basic Safety and Essential Performance of High Frequency Surgical Equipment and High Frequency Surgical Accessories</i> (IEC 60601-2-2:2009 Withdrawn) (5.0 ed. Feb. 2009)
2078	International Standard, <i>Medical Electrical Equipment - Part 2-2: Particular Requirements for the Basic Safety and Essential Performance of High Frequency Surgical Equipment and High Frequency Surgical Accessories</i> (IEC 60601-2-2:2009 Withdrawn), INT'L ELECTROTECHNICAL COMM'N WEBSTORE (5.0 ed.) (Feb. 23, 2009), https://webstore.iec.ch/publication/2624 (last visited Aug. 25, 2023) (Abstract only)
2079	Sylfirm X (product information), ViOL (2022), https://violmedical.com/for_providers/product?idx=10 (last visited Feb. 25, 2023)
2080	RESERVED
2081	RESERVED
2082	RESERVED
2083	ViOL, Sylfirm X User Manual (VO-UM-SFX-03), revised April 20, 2022
2084	Sylfirm X, Device Description (PROTECTIVE ORDER MATERIAL)
2085	RESERVED
2086	Sylfirm X Product Photographs

Exhibit	Description
2087	Presentation: D. van der Weide, RF Microneedle Arrays: Thermal Results, dated July 26, 2023
2088	Photographs: Products at Issue Examinations (June–August 2023)
2089	Cirtec Medical System Drawings, Project: AW000083_A GTW RF PCB, including Certificate of Translation (PROTECTIVE ORDER MATERIAL)
2090	ViOL, Sylfirm X RF Waveform, R&D (May 22, 2023) (PROTECTIVE ORDER MATERIAL)
2091	Product photograph (CX-3378C.1)
2092	Product photograph (CX-3379C.1)
2093	Product photograph (CX-3380C.1)
2094	Product photograph: Bi-Polar Electrodes, Consumable Tip
2095	Jae Min Shin & Jeong Eun Kim, <i>Radiofrequency in Clinical Dermatology</i> , 2 MED. LASERS 49 (2013)
2096	Tae Hwan Ahn & Sung Bun Cho, <i>Invasive Pulse-Type, Bipolar, Alternating Current Radiofrequency Treatment Using Microneedle Electrodes for Nasal Rosacea</i> , 6 MED. LASER 32 (2017)
2097	Sylfirm X Introduction Video 1
2098	Transcript of Exhibit 2097 - Sylfirm X Introduction Video 1
2099	Sylfirm X Introduction Video 2
2100	Transcript of Exhibit 2099 - Sylfirm X Introduction Video 2

Exhibit	Description
2101	Press Release, BENEV Co., Inc., <i>BENEV Launches Sylfirm X Ultimate Edition, a Novel Radiofrequency Micro-needling Device, in the U.S. as the Exclusive Distributor</i> (Apr. 26, 2021, 14:51 ET), https://www.prnewswire.com/news-releases/benev-launches-sylfirm-x-ultimate-edition-a-novel-radiofrequency-micro-needling-device-in-the-us-as-the-exclusive-distributor-301277036.html
2102	Presentation: Jiehoon Kim, ViOL / Sylfirm, <i>Pigmentary and Vascular Treatment with Pulsed RF “Sylfirm,”</i> including Certificate of Translation (PROTECTIVE ORDER MATERIAL)
2103–2138	RESERVED
2139	Declaration of Vincent A. Thomas, dated April 23, 2024 (“Thomas Decl.”) (PROTECTIVE ORDER MATERIAL AND REDACTED VERSIONS)
2140	Declaration of Charles H. Sanders in Response to Petitioner’s Objections to Patent Owner’s Evidence [<i>served, not filed</i>]
2141	Declaration of Cecilia Peniza in Support of Patent Owner’s Unopposed Motion for <i>Pro Hac Vice</i> Admission Under 37 C.F.R. § 42.10(c)
2142	Declaration of David Goldberg in Support of ’836 Patent Owner’s Response, dated November 04, 2024 (“Goldberg Decl.”)
2143	Declaration of Daniel van der Weide in Support of ’836 Patent Owner’s Response, dated November 04, 2024 (“VDW Decl.”) (PROTECTIVE ORDER MATERIAL AND REDACTED VERSIONS)
2144	Deposition transcript of Jean Woloszko, M.D., Ph.D., <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), taken September 14, 2023 (excerpts)
2145	Deposition transcript of Jean Woloszko, M.D., Ph.D., <i>Jeisys Medical Inc. v. Serendia, LLC</i> , IPR2024-00386, taken October 10, 2024

Exhibit	Description
2146	Deposition transcript of R. James Koch, M.D., <i>Jeisys Medical Inc. v. Serendia, LLC</i> , IPR2024-00386, taken October 19, 2024
2147	Katarina Kesty & David J. Goldberg, <i>Radiofrequency Microneedling for Acne, Acne Scars, and More</i> , 1 DERMATOLOGICAL REVS. 33 (2020)
2148	Andrew I. Brill, <i>Bipolar Electrosurgery: Convention and Innovation</i> , 51 CLINICAL OBSTETRICS GYNECOLOGY 153 (2008)
2149	Letter from Long Chen, U.S. Food & Drug Administration letter to Lisa Pritchard, Galvanize Therapeutics, Inc. (June 17, 2022), regarding K212871 (Aliya(TM) System, Aliya(TM) Generator, Aliya(TM) Needle, Aliya(TM) Electrode; Regulation Number: 21 CFR 878.4400; Regulation Name: Electrosurgical Cutting and Coagulation Device and Accessories; Regulatory Class: Class II; Product Code: OAB; Dated: September 6, 2021; Received: September 9, 2021) (Ex. CX-2845 to the deposition of Dr. Jean Woloszko, taken October 10, 2024)
2150	R. James Koch MD Inc., Legal & Medical Device Consulting: Stanford-trained, Double Board-Certified Facial Plastic Surgeon, Practice Website (2024) (Ex. 1 to the deposition of Dr. R. James Koch, taken October 19, 2024)
2151	U.S. Patent No. 9,510,899 B2 (“Manstein ’899”) (Ex. 2 to the deposition of Dr. R. James Koch, taken October 19, 2024)
2152-2154	RESERVED
2155	Declaration of Charles H. Sanders in Response to Petitioner’s Objections to Patent Owner’s Evidence [<i>served, not filed</i>]
2156	Settlement Agreement (BOARD ONLY)

Respectfully submitted,

Dated: December 18, 2024

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 18th day of December, 2024, a true and correct copy of the foregoing **Patent Owner's Updated Exhibit List and Exhibit 2156** were served by electronic mail on Petitioner's lead and backup counsel at the following email addresses:

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