UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NINTENDO CO., LTD., and
NINTENDO OF AMERICA INC.,
Petitioners

v.

AMERICAN GNC CORPORATION,
Patent Owner

Case No. IPR2024-00667
U.S. Patent No. 6,508,122 B1

PETITIONERS' UPDATED EXHIBIT LIST

Exhibit No.	Description of Document
1001	U.S. Patent No. 6,508,122 B1 to Hiram McCall, et al. (filed Sept. 15, 2000, issued Jan. 21, 2003) ("'122" or "'122 patent")
1002	Declaration of Darrin Young, Ph.D. (with exhibits)
1003	U.S. Patent No. 5,945,599 A to Motohiro Fujiyoshi, et al. (filed Dec. 12, 1997, issued Aug. 31, 1999) ("Fujiyoshi")
1004	International Patent Publication No. WO 99/14,557 to Kevin Townsend (filed Sept. 17, 1998, published March 25, 1999) ("Townsend")
1005	U.S. Patent No. 5,604,311 to Lalit Kumar, et al. (filed June 7, 1995, issued February 18, 1997) ("Kumar")
1006	U.S. Patent No. 3,838,346 to Donald Clyde Cox (filed Nov. 1, 1973, issued Sept. 24, 1974) ("Cox")
1007	Japanese Patent Application Publication No. 9[1997]-42973 (filed Aug. 1, 1995, published Feb. 14, 1997) ("Mitamura")
1008	Excerpts from Shmuel Merhav, *Aerospace Sensor Systems and Applications* (1996)
1009	Certified English Translation of **Exhibit 1007**
1010	Excerpts from Ljubisa Ristic (ed.), *Sensor Technology and Devices* (1994)
1011	Excerpts from J.M. Slater, *Inertial Guidance Sensors* (1964)
1012	Excerpts from Myron Kayton, *Avionics Navigation Systems* (2d Ed. 1997)

Exhibit No.	Description of Document
1013	Excerpts from David Irwin, *The Industrial Electronics Handbook* (1997)
1014	Excerpts from Anthony Lawrence, *Modern Inertial Technology* (1993)
1015	Excerpts from Connie L. McClure, *Theory of Inertial Guidance* (1960)
1016	Declaration of Ingrid Hsieh-Yee, Ph.D. (with exhibits)
1017	Proof of Service of Summons and Complaint, ECF No. 10, dated March 8, 2023, filed in *American GNC Corp. v. Nintendo Co., Ltd., et al*, Case No. 2:23-cv-00302-TL (W.D. Wash.)
1018	Patent Owner's Opening Claim Construction Brief, ECF No. 55, dated March 2, 2021, filed in *American GNC Corp. v. OnePlus Tech. (Shenzhen) Co., Ltd.*, Case No. 6:20-cv-00171-ADA (W.D. Tex.)
1019	Patent Owner's Reply Claim Construction Brief, ECF No. 57, dated April 6, 2021, filed in *American GNC Corp. v. OnePlus Tech. (Shenzhen) Co., Ltd.*, No. 6:20-cv-00171-ADA (W.D. Tex.)
1020	Patent Owner's Opening Claim Construction Brief, ECF No. 92, dated January 30, 2018, filed in *American GNC Corp. v. LG Electronics Inc., et al*, No. 3:17-CV-1090-BAS-BLM (S.D. Cal.)
1021	Patent Owner's Responsive Claim Construction Brief, ECF No. 97, dated February 13, 2018, filed in *American GNC Corp. v. LG Electronics Inc., et al*, No. 3:17-CV-1090-BAS-BLM (S.D. Cal.)
1022	Patent Owner's Opening Claim Construction Brief, ECF No. 111, dated February 21, 2018, filed in *American GNC Corp. v. ZTE (USA) Inc., et al*, Case No. 4:17-cv-00620-ALM-KPJ (E.D. Tex.)

Exhibit No.	Description of Document
1023	Patent Owner's Reply Claim Construction Brief, ECF No. 122, dated March 14, 2018, filed in *American GNC Corp. v. ZTE (USA) Inc., et al*, No. 4:17-cv-00620-ALM-KPJ (E.D. Tex.)
1024	File history for U.S. Patent No. 6,508,122 B1
1025	Additional pages from Shmuel Merhav, *Aerospace Sensor Systems and Applications* (1996) (not included with **EX1008**)
1026	Petitioner's Preliminary Claim Constructions and Extrinsic Evidence, dated January 29, 2024, in *American GNC Corp. v. Nintendo Co., Ltd.*, No. 2:23-cv-00302-TL (W.D. Wash.)
1027	Biography of Dena Chen
1028	Declaration of Dena Chen ISO Motion for *Pro Hac Vice* Admission
1029	Biography of Patrick W. Lauppe
1030	Declaration of Patrick W. Lauppe ISO Motion for *Pro Hac Vice* Admission
1031	Biography of Mark R. Weinstein
1032	Declaration of Mark R. Weinstein ISO Motion for *Pro Hac Vice* Admission
1033	Biography of Stephen Smith
1034	CORRECTED Declaration of Stephen Smith ISO Motion for *Pro Hac Vice* Admission
1035	Excerpt from EX2019, Declaration of Lawrence E. Larson, ¶ 57

Exhibit No.	Description of Document
1036	*Reserved*
1037	Thor Nelson Juneau's Dissertation, *Micromachined Dual Input Axis Rate Gyroscope*, submitted for the degree of Doctor of Philosophy in Engineering-Mechanical Engineering in the Graduate Division of the University of California, Berkeley
1038	*Reserved*
1039	American GNC Corporation website pages
1040	Cover page for International Publication Number WO 97/45699 to William A. Clark et al. (filed May 31, 1996, published December 4, 1997)
1041	*Reserved*
1042	*Reserved*
1043	*Reserved*
1044	Gabor C. Temes et al., *State-of-the-Art and Future Prospects for Analogue Signal Processing -A Tutorial*, ISCAS'88, pp. 1655-1660 (1988)
1045	Reply Declaration of Darrin Young, Ph.D.
1046	Deposition transcript of Dr. Lawrence Larson, taken on March 28, 2025
1047	*Reserved*
1048	Deposition transcript of Hiram McCall, taken on March 14, 2025

Exhibit No.	Description of Document
1049	American GNC's Answer to Counterclaims in *American GNC Corp. v. Nintendo Co. Ltd. et al.*, ECF No. 40, Case No. 2:23-cv-00302 TL (W.D. Wash. February 13, 2024)
1050	STMicroelectronics N.V.'s Motion to Dismiss under Rules 12(b)(2), 12(b)(5), and 12(b)(6), ECF No. 16, Civ. A. No. 6:20-cv-171 (W.D. Tex. June 8, 2020)
1051	Minute Entry *American GNC Corp. v. Nintendo Co. Ltd. et al.*, ECF No. 48, Case No. 2:23-cv-00302 TL (W.D. Wash. May 9, 2024)
1052	Unopposed Motion for Issuance of Request for International Judicial Assistance Pursuant to the Hague Convention, *American GNC Corp. v. Nintendo Co. Ltd. et al.*, ECF No. 49, Case No. 2:23-cv-00302 TL (W.D. Wash. May 13, 2024)
1053	"Crossbow DMU-6X and DMU-VGX Silicon IMU and Vertical Gyro" (1998)
1054	*Reserved*
1055	U.S. Patent No. 5,349,855 to Jonathan J. Bernstein (filed April 7, 1992, issued September 27, 1994)
1056	U.S. Patent No. 6,671,648 B2 to Hiram McCall et al. (filed Oct. 22, 2001, issued Dec. 30, 2003) ("'648 patent")
1057	International Publication Number WO 97/45699 to William A. Clark et al. (filed May 30, 1997, published December 4, 1997)
1058	Mark Alan Lemkin's Dissertation, *Micro Accelerometer Design with Digital Feedback Control*, submitted for the degree of Doctor of Philosophy in Engineering-Mechanical Engineering in the Graduate Division of the University of California, Berkeley (1997)

Exhibit No.	Description of Document
1059	Crist Lu et al., *A Monolithic Surface Micromachined Accelerometer with Digital Output*, IEEE J. Solid-State Circuits, 30(12):1367-1373 (1995)
1060	Weiji Yun et al., *Surface Micromachined, Digitally Force-Balanced Acceleromter [sic] with Integrated CMOS Detection Circuitry*, IEEE, pp. 126-131 (1992)
1061	Excerpts from Ljubisa Ristic (ed.), *Sensor Technology and Devices* (1994)
1062	Excerpts from J. David Irwin (ed.), *The Industrial Electronics Handbook* (1997)
1063	"Accelerometer ACH-04-08-05" (1996)
1064	Analog Devices, "ADXL05: ±1 *g* to ±5 *g* Single Chip Accelerometer with Signal Conditioning" (1996)
1065	Analog Devices, "ADXL50: Monolithic Accelerometer with Signal Conditioning" (1996)

Dated: April 15, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify, pursuant to 37 C.F.R. Sections 42.6, that a complete copy of the attached **PETITIONERS' UPDATED EXHIBIT LIST** and related documents, are being served via electronic mail on the 15th day of April 2025, upon Patent Owner's counsel as follows:

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Dated: April 15, 2025 *<u>/s/ Matthew J. Brigham</u>*
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