

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 IPR2024-00668
U.S. Patent No. 6,671,648 B2

PETITIONERS' UPDATED EXHIBIT LIST

Exhibit No.	Description of Document
1001	U.S. Patent No. 6,671,648 B2 to Hiram McCall, et al. (filed Oct. 22, 2001, issued Dec. 30, 2003) (“’648” or “’648 patent”)
1002	Declaration of Darrin Young, Ph.D.
1003	U.S. Patent No. 4,675,820 to Jeffrey T. Smith, et al. (filed Apr. June 14, 1984, issued June 23, 1987) (“Smith”)
1004	U.S. Patent No. 4,424,038 to Paul Tingleff, et al. (filed Apr. Jan. 31, 1980, issued Jan. 3, 1984) (“Tingleff”)
1005	U.S. Patent No. 6,058,778 to Tsiu Chiu Chan (filed October 24, 1997, issued May 9, 2000) (“Chan”)
1006	U.S. Patent No. 5,203,208 to Jonathan J. Bernstein (filed April 29, 1992, issued April 20, 1993) (“Bernstein”)
1007	Excerpts from J. David Irwin et al., <i>Introduction to Electrical Engineering</i> (1995) (“Irwin”)
1008	Excerpts from Shmuel Merhav, <i>Aerospace Sensor Systems and Applications</i> (1996) (“Merhav”)
1009	Japanese Patent Application JPH07313649A to Yuichiro Yamawaki et al. (filed May 27, 1994, published December 5, 1995)
1010	Certified English Translation of Exhibit 1009
1011	U.S. Patent No. 4,820,953 to Malcolm Saubolle et al. (filed November 23, 1987, issued April 19, 1989) (“Saubolle”)
1012	Excerpts from <i>IEEE Standard Dictionary of Electrical and Electronics Terms</i> (1996)
1013	U.S. Patent No. 5,396,797 to Rand H. Hulsing, II (filed December 8, 1992, issued March 14, 1995) (“Hulsing”)
1014	U.S. Patent No. 5,841,537 to James H. Doty (filed August 11, 1997, issued November 24, 1998) (“Doty”)
1015	Prosecution history of U.S. Patent No. 6,671,648 B2

Exhibit No.	Description of Document
1016	Affidavit of Service in <i>American GNC Corp. v. Nintendo Co., Ltd et al.</i> , ECF No. 10, Case No. 2:23-cv-00302 TL (W.D. Wash.)
1017	Order on Motion to Dismiss in <i>American GNC Corp. v. Nintendo Co. Ltd. et al.</i> , ECF No. 38, Case No. 2:23-cv-00302 TL (W.D. Wash January 10, 2024)
1018	AGNC's Opening Claim Construction Brief in <i>American GNC Corp. v. ZTE (USA) Inc. et al.</i> , ECF No. 111, Case No. 17:cv-00620-ALM-KPJ (E.D. Tex. February 21, 2018)
1019	AGNC's Opening Claim Construction Brief in <i>American GNC Corp. v. Oneplus Technology (Shenzhen) Co., Ltd.</i> , ECF No. 55, Case No, 6:20-cv-00171-ADA (W.D. Tex. March 2, 2021)
1020	AGNC's Opening Claim Construction Brief in <i>American GNC Corp. v. LG Electronics Inc. et al.</i> , ECF No. 92, Case No. 17-cv-0190-BAS-BLM (S.D. Cal. January 30, 2018)
1021	Declaration of Ingrid Hsieh-Yee, Ph.D.
1022	Additional pages from J. David Irwin et al., <i>Introduction to Electrical Engineering</i> (1995) (not included with EX1007)
1023	Additional pages from Shmuel Merhav, <i>Aerospace Sensor Systems and Applications</i> (1996) (not included with EX1008)
1024	Biography of Dena Chen
1025	Declaration of Dena Chen ISO Motion for <i>Pro Hac Vice</i> Admission
1026	Biography of Patrick W. Lauppe
1027	Declaration of Patrick W. Lauppe ISO Motion for <i>Pro Hac Vice</i> Admission
1028	Biography of Mark R. Weinstein
1029	Declaration of Mark R. Weinstein ISO Motion for <i>Pro Hac Vice</i> Admission

Exhibit No.	Description of Document
1030	Biography of Stephen Smith
1031	CORRECTED Declaration of Stephen Smith ISO Motion for <i>Pro Hac Vice</i> Admission
1032	<i>Reserved</i>
1033	<i>Reserved</i>
1034	<i>Reserved</i>
1035	Excerpt from EX2019, Declaration of Lawrence E. Larson, ¶ 57
1036	<i>Reserved</i>
1037	Thor Nelson Juneau's Dissertation, <i>Micromachined Dual Input Axis Rate Gyroscope</i> , submitted for the degree of Doctor of Philosophy in Engineering-Mechanical Engineering in the Graduate Division of the University of California, Berkeley
1038	Roy R. Minor et al., <i>Utilization of GPS/MEMS-IMU for Measurement of Dynamics for Range Testing of Missiles and Rockets</i> , IEEE 1998 Position Location and Navigation Symposium (1998)
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	<i>Reserved</i>
1042	<i>Reserved</i>
1043	Cover page for Rand Hulsing, <i>MEMS Inertial Rate and Acceleration Sensor</i> , IEEE AES Systems Magazine, p. 17 (Nov. 1998)
1044	Gabor C. Temes et al., <i>State-of-the-Art and Future Prospects for Analogue Signal Processing -A Tutorial</i> , ISCAS'88, pp. 1655-1660 (1988)

Exhibit No.	Description of Document
1045	Reply Declaration of Darrin Young, Ph.D.
1046	Deposition transcript of Dr. Lawrence Larson, taken on March 28, 2025
1047	Rand Hulsing, <i>MEMS Inertial Rate and Acceleration Sensor</i> , IEEE AES Systems Magazine, pp. 17-23 (Nov. 1998)
1048	Deposition transcript of Hiram McCall, taken on March 14, 2025
1049	American GNC's Answer to Counterclaims in <i>American GNC Corp. v. Nintendo Co. Ltd. et al.</i> , 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 <i>American GNC Corp. v. Nintendo Co. Ltd. et al.</i> , 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, <i>American GNC Corp. v. Nintendo Co. Ltd. et al.</i> , 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	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")
1055	<i>Reserved</i>
1056	<i>Reserved</i>
1057	International Publication Number WO 97/45699 to William A. Clark et al. (filed May 30, 1997, published December 4, 1997)
1058	<i>Reserved</i>

Exhibit No.	Description of Document
1059	<i>Reserved</i>
1060	<i>Reserved</i>
1061	<i>Reserved</i>
1062	<i>Reserved</i>
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)
1066	Declaration of Ingrid Hsieh-Yee, Ph.D. dated May 6, 2025
1067	Joint Claim Chart and Prehearing Statement filed on March 22, 2024 (Dkt. 41) in <i>American GNC Corporation v. Nintendo Co., Ltd., et al.</i> , No. 2:23-cv-00302-TL (W.D. Wash.).
1068	157 CONG. REC. S5402-43 (daily ed. Sept. 8, 2011) (statement of Sen. Jon Kyl)
1069	Rejection of Service of Process, <i>American GNC Corp. v. OnePlus Tech. (Shenzhen) Co., et al.</i> , ECF No. 22-1, No. 6:20-cv-00171-ADA (W.D. Tex. Jun. 25, 2020)
1070	STMicroelectronics N.V.’s Reply in Support of Motion to Dismiss, <i>American GNC Corp. v. OnePlus Tech. (Shenzhen) Co., et al.</i> , ECF No. 23, No. 6:20-cv-00171-ADA (W.D. Tex. Jun. 29, 2020)
1071	Request for Issuance of Amended Summons, <i>American GNC Corp. v. OnePlus Techn. (Shenzhen) Co., et al.</i> , ECF No. 48, No. 6:20-cv-00171-ADA (W.D. Tex. Nov. 30, 2020)
1072	Amended Summons, <i>American GNC Corp. v. OnePlus Techn. (Shenzhen) Co., et al.</i> , ECF No. 49, No. 6:20-cv-00171-ADA (W.D. Tex. Nov. 30, 2020)

Exhibit No.	Description of Document
1073	Notice of Dismissal of STMicroelectronics N.V. and STMicroelectronics S.R.L. Without Prejudice, <i>American GNC Corp. v. OnePlus Tech. (Shenzhen) Co., et al.</i> , ECF No. 50, No. 6:20-cv-00171-ADA (W.D. Tex. Dec. 4, 2020)
1074	Declaration of Matthew J. Brigham dated May 23, 2025
1075	Petitioners' Demonstrative Exhibit

Dated: May 23, 2025

Respectfully submitted,

COOLEY LLP
ATTN: Patent Group
1299 Pennsylvania Avenue NW
Suite 700
Washington, DC 20004
Tel: (650) 843-5667
Fax: (650) 849-7400

/ Matthew J. Brigham /
Matthew J. Brigham
Reg. No. 44,047
Counsel for Petitioner

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 23rd day of May 2025, upon Patent Owner's counsel as follows:

Brenda Entzminger
Reg. No. 76,896
Corey Johanningmeier, Back-up Counsel
(*pro hac vice*)
Bunsow De Mory LLP
701 El Camino Real
Redwood City, CA 94063
Telephone: 650-351-7248
Facsimile: 415-426-4744
bentzminger@bdiplaw.com
cjohanningmeier@bdiplaw.com

Dated: May 23, 2025

/ Matthew J. Brigham /
Matthew J. Brigham