

Filed on behalf of:
Kustom Signals Inc.

Filed: February 13, 2025

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLIED CONCEPTS INC.,
Petitioner,

v.

KUSTOM SIGNALS INC.,
Patent Owner.

Case IPR2024-00884
U.S. Patent No. 11,703,602

Before CARL M. DEFRANCO, RICHARD H. MARSCHALL,
and BACH V. HOANG, *Administrative Patent Judges*.

PATENT OWNER'S UPDATED EXHIBIT LIST

Pursuant to 37 C.F.R. § 42.63(e), Patent Owner Kustom Signals Inc. hereby submits a current listing of Petitioner's exhibits.

Exhibit	Description	Statement of Relevance	Filed
2001	U.S. Patent No. 7,444,240 to MacNielle	Discussion of recognition of GPS inaccuracy	☒
2002	U.S. Provisional Application Serial No. 62/569,667	Provisional application priority document for U.S. Patent No.11,703,602	
2003	Declaration of Dr. Chris Bartone	Expert declaration regarding validity of challenged claims	☒
2004	Curriculum vitae of Dr. Chris Bartone	Qualifications of Dr. Bartone	☒
2005	Claims of U.S. Patent No. 11,703,602	Claims	☒
2006	U.S. Provisional Application Serial No. 62/569,923 entitled GPS ASSISTED PATROL SPEED SEARCH FOR DISP TRAFFIC RADAR	Provisional application priority document for U.S. Patent No.11,703,602	☒
2007	Excerpts of Grewal, Andrews, Bartone, Global Navigation Satellite Systems, Inertial Navigation, and Integration, Third Edition, Chapter 7 GNSS Data Errors, John Wiley, ISBN: 978-1-1184-4700-0, 2013	Learned treatise including discussion of GPS inaccuracy	☒
2008	Declaration of Kent Hayes	Authentication and explanation of accuracy requirements of down-the-range radar modules	☒

Exhibit	Description	Statement of Relevance	Filed
2009	U.S. Department of Transportation, National Highway Traffic Safety Administration, Technical Manual, Speed-Measuring Device Performance Specifications: Down-The-Road Radar Module, DOT HS 812 266, April 2016.	Standards explaining accuracy requirements of down-the-range radar modules	☒
2010	U.S. Department of Transportation, National Highway Traffic Safety Administration, Technical Manual, Speed-Measuring Device Performance Specifications: Down-The-Road Radar Module, DOT HS 809 812, June 2004	Standards explaining accuracy requirements of down-the-range radar modules	☒
2011	File history for U.S. Patent No. 11,194,039	Prosecution history for U.S. Patent No. 11,194,039	☒
2012	U.S. Patent No. 11,194,039	U.S. Patent No. 11,194,039	☒
2013	Transcript of Deposition of Dr. Brian Anthony	Transcript of cross-examination of Dr. Anthony	☒

Dated: February 13, 2025

/s/ **Scott R. Brown**

Scott R. Brown (Reg. No. 40,535)

sbrown@hoveywilliams.com

Matthew B. Walters (Reg. No. 65,343)

mwalters@hoveywilliams.com

HOVEY WILLIAMS LLP

10801 Mastin Blvd., Suite 1000

Overland Park, Kansas 66210

Telephone: 913.647.9050

Fax: 913.647.9057

Counsel for Patent Owner

Certificate of Service

Pursuant to 37 C.F.R. § 42.6(e), I certify that on February 13, 2025, a true and correct copy of **Patent Owner's Updated Exhibit List** was served by electronic mail on Patent Owner's lead and backup counsel at the following email addresses:

Wasif Qureshi
Chris Rourke

wqureshi@jw.com
crouke@jw.com

/s/ **Scott R. Brown**

Scott R. Brown (Reg. No. 40,535)

sbrown@hoveywilliams.com

Matthew B. Walters (Reg. No. 65,343)

mwalters@hoveywilliams.com

HOVEY WILLIAMS LLP

10801 Mastin Blvd., Suite 1000

Overland Park, Kansas 66210

Telephone: 913.647.9050

Fax: 913.647.9057

Counsel for Patent Owner