

U.S. Patent No. 7,373,449
IPR2024-01081

Paper No. _____

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QUALCOMM INCORPORATED,
Petitioner

v.

NETWORK SYSTEM TECHNOLOGIES, LLC
Patent Owner

Patent No. 7,373,449

Inter Partes Review No. IPR2024-01081

PATENT OWNER'S EXHIBIT LIST

LISTING OF EXHIBITS

Exhibit No.	Description
2001	Declaration of Dr. Erik Chmelar
2002	<i>Curriculum vitae</i> of Dr. Erik Chmelar
2003	Neil Weste & David Harris, CMOS VLSI DESIGN: A CIRCUIT AND SYSTEMS PERSPECTIVE (4th ed. 2010)
2004	Jan Rabaey, Anantha Chandrakasan & Borivoje Nikolic, DIGITAL INTEGRATED CIRCUITS: A DESIGN PERSPECTIVE (2nd ed. 2003)
2005	William J. Dally & Brian Towles, <i>Route Packets, Not Wires: On-Chip Interconnection Networks</i> , PROC. 38TH DESIGN AUTOMATION CONF. (2001)
2006	John F. Wakerly, DIGITAL DESIGN: PRINCIPLES AND PRACTICES (4th ed. 2005)
2007	Fayez Gebali, Haytham Elmiligi & Mohamed Watheq El-Kharashi, NETWORKS-ON-CHIPS: THEORY AND PRACTICE (2009)
2008	Kurt Shuler, <i>Busses, Crossbars and NoCs: The 3 Eras of SoC Interconnect History</i> , ARTERISIP (Oct. 22, 2010), https://www.arteris.com/blog/busses-crossbars-and-nocs-the-3-eras-of-soc-interconnect-history/
2009	Kurt Shuler, <i>The SoC Interconnect Fabric: A Brief History</i> , ARTERISIP (Aug. 6, 2013), https://www.arteris.com/blog/the-soc-interconnect-fabric-a-brief-history/
2010	William Stallings, DATA & COMPUTER COMMUNICATIONS (6th ed. 1999)
2011	RESERVED
2012	United States District Courts — National Judicial Caseload Profile
2013-2020	RESERVED

Exhibit No.	Description
2021	Order Resetting Jury Trial, <i>Network System Technologies, LLC v. Texas Instruments Incorporated</i> , Civil Action No. 2:22-cv-00482-RWS (E.D. Tex.), Dkt. 182 (Mar. 18, 2024)
2022	Claim Construction Order, <i>Network System Technologies, LLC v. Texas Instruments Incorporated</i> , Civil Action No. 2:22-cv-00482-RWS (E.D. Tex.), Dkt. 150 (Jan. 3, 2024)
2023-2027	RESERVED
2028	Docket Control Order, <i>Network System Technologies, LLC v. Samsung Electronics Co., Ltd. et al.</i> , Civil Action No. 2:22-cv-00481-JRG (E.D. Tex.), Dkt. 59 (Jun. 16, 2023)
2029	Samsung's First Amended Answer and Counterclaims, <i>Network System Technologies, LLC v. Samsung Electronics Co., Ltd. et al.</i> , Civil Action No. 2:22-cv-00481-JRG (E.D. Tex.), Dkt. 96 (Jan. 24, 2024) (Public Version)
2030	Samsung's P.R. 4-1 Identification of Proposed Terms and Claim Elements for Construction, <i>Network System Technologies, LLC v. Samsung Electronics Co., Ltd.</i> , Civil Action No. 2:22-cv-00482-RWS (E.D. Tex.) (Nov. 28, 2023)
2031	Samsung's Amended P.R. 4-1 Identification of Proposed Terms and Claim Elements for Construction, <i>Network System Technologies, LLC v. Samsung Electronics Co., Ltd.</i> , Civil Action No. 2:22-cv-00482-RWS (E.D. Tex.) (Dec. 18, 2023)
2032	Samsung's Preliminary Claim Construction and Extrinsic Evidence Pursuant to Local Patent Rule 4-2, <i>Network System Technologies, LLC v. Samsung Electronics Co., Ltd.</i> , Civil Action No. 2:22-cv-00482-RWS (E.D. Tex.) (Dec. 19, 2023)
2033	P.R. 4-3 Claim Construction and Prehearing Statement, <i>Network System Technologies, LLC v. Samsung Electronics Co., Ltd.</i> , Civil Action No. 2:22-cv-00482-RWS (E.D. Tex.), Dkt. 91 (Jan. 9, 2024)
2034	Plaintiff Network System Technologies, LLC's Opening Claim Construction Brief, <i>Network System Technologies, LLC v.</i>

Exhibit No.	Description
	<i>Samsung Electronics Co., Ltd.</i> , Civil Action No. 2:22-cv-00482-RWS (E.D. Tex.), Dkt. 100 (Feb. 20, 2024)
2035	Defendant Samsung Electronics Co., Ltd.’s Responsive Claim Construction Brief, <i>Network System Technologies, LLC v. Samsung Electronics Co., Ltd.</i> , Civil Action No. 2:22-cv-00482-RWS (E.D. Tex.), Dkt. 112 (March 12, 2024)
2036	Plaintiff Network System Technologies, LLC’s Reply Construction Brief, <i>Network System Technologies, LLC v. Samsung Electronics Co., Ltd.</i> , Civil Action No. 2:22-cv-00482-RWS (E.D. Tex.), Dkt. 116 (March 19, 2024)
2037	RESERVED
2039	Second Amended Scheduling Order, <i>Network System Technologies, LLC v. Qualcomm Incorporated et al.</i> , Civil Action No. 1:22-cv-1331-DAE (W.D. Tex.) Dkt. 80 (Oct. 23, 2023)
2040	Defendants’ Joint Opening Claim Construction Brief, <i>Network System Technologies, LLC v. Qualcomm Incorporated et al.</i> , Civil Action No. 1:22-cv-1331-DAE (W.D. Tex.), Dkt. 77 (Oct. 12, 2023)
2041	Plaintiff Network System Technologies, LLC’s Responsive Claim Construction Brief, <i>Network System Technologies, LLC v. Qualcomm Incorporated et al.</i> , Civil Action No. 1:22-cv-1331-DAE (W.D. Tex.), Dkt. 81 (Nov. 16, 2023)
2042	Defendants’ Joint Reply Claim Construction Brief, <i>Network System Technologies, LLC v. Qualcomm Incorporated et al.</i> , Civil Action No. 1:22-cv-1331-DAE (W.D. Tex.), Dkt. 83 (Nov. 30, 2023)
2043	Plaintiff Network System Technologies, LLC’s Sur-Reply Claim Construction Brief, <i>Network System Technologies, LLC v. Qualcomm Incorporated et al.</i> , Civil Action No. 1:22-cv-1331-DAE (W.D. Tex.), Dkt. 86 (Dec. 14, 2023)
2044	Defendants’ Supplemental Claim Construction Brief, <i>Network System Technologies, LLC v. Qualcomm Incorporated et al.</i> , Civil

Exhibit No.	Description
	Action No. 1:22-cv-1331-DAE (W.D. Tex.), Dkt. 105 (Mar. 1, 2024)
2045	Plaintiff Network System Technologies, LLC's Supplemental Claim Construction Brief, <i>Network System Technologies, LLC v. Qualcomm Incorporated et al.</i> , Civil Action No. 1:22-cv-1331-DAE (W.D. Tex.), Dkt. 106 (Mar. 1, 2024)
2046	Defendants' Supplemental Invalidity Contention Cover Pleading, <i>Network System Technologies, LLC v. Qualcomm Incorporated et al.</i> , Civil Action No. 1:22-cv-1331-DAE (W.D. Tex.) (Jan. 23, 2024)
2047-2049	RESERVED
2050	Defendants' Invalidity and Ineligibility Contentions And Disclosures Pursuant to Patent Rule 3-3 Cover Pleading, <i>Network System Technologies, LLC v. Samsung Electronics Co., Ltd., et al.</i> , Civil Action No. 2:22-cv-00481-JRG (E.D. Tex.) (July 11, 2023)
2051-2061	RESERVED.
2062	Statutory Disclaimer dated March 25, 2024
2063	Defendant Qualcomm Incorporated Return of Service, <i>Network System Technologies, LLC v. Qualcomm Incorporated et al.</i> , Civil Action No. 1:22-cv-1331-DAE (W.D. Tex.), Dkt. 10 (Dec. 29, 2022)
2064	Board Email Authorizing NST and Samsung to Jointly File Motion to Terminate IPR2024-00338
2065	Defendant Qualcomm Incorporated's Opposed Motion to Stay Pending <i>Inter Partes</i> Review, <i>Network System Technologies, LLC v. Qualcomm Incorporated et al.</i> , Civil Action No. 1:22-cv-1331-DAE (W.D. Tex.), Dkt. 130 (July 2, 2024)
2066	Defendants Qualcomm Incorporated's Invalidity Contention Cover Pleading, <i>Network System Technologies, LLC v. Qualcomm</i>

Exhibit No.	Description
	<i>Incorporated et al.</i> , Civil Action No. 1:22-cv-1331-DAE (W.D. Tex.) (Sept. 22, 2023).
2067	Board's July 11, 2024 Email, <i>Samsung Elecs. Co. Ltd. v. Network Sys. Techs., LLC</i> , IPR2024-00338, EX3003 (PTAB July 11, 2024)
2068	Brief For The Federal Respondent In Opposition, <i>VirnetX Inc., et al. v. Mangrove Partners Master Fund, Ltd., et al.</i> , No. 23-315

Respectfully submitted,

Dated: July 22, 2024

By: /Jennifer Hayes/
Jennifer Hayes
Reg. No. 50,845
Nixon Peabody LLP
300 South Grand Avenue,
Suite 4100,
Los Angeles, CA 90071-3151
Tel. 213-629-6179
Fax 866-781-9391

Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Patent Owner's**

Exhibit List was served on July 22, 2024, by email:

J. Derek Vandenburg
Aaron W. Pederson
Nathan D. Louwagie
Ryan D. Rypka
Carlson Caspers Vandenburg & Lindquist, P.A.
225 South Sixth Street, Suite 4200
Minneapolis, MN 55402
dvandenburg@carlsoncaspers.com
apederson@carlsoncaspers.com
nlouwagie@carlsoncaspers.com
rrypka@carlsoncaspers.com
Phone: (612) 436-9600
Fax: (612) 436-9605

Counsel for Petitioner, Qualcomm Incorporated

By: /s/ Jennifer Hayes

Lead Counsel for Patent Owner