UNITED STATES PATENT AND TRADEMARK OFFICE

_____

BEFORE THE PATENT TRIAL AND APPEAL BOARD

_____

TIKTOK INC.,
Petitioner,

v.

NTECH PROPERTIES, INC.,
Patent Owner.

_____

Case No. IPR2024-01340
U.S. Patent No. 8,145,704

PATENT OWNER'S UPDATED EXHIBIT LIST

PATENT OWNER'S UPDATED EXHIBIT LIST

Exhibit	Description
2001	Declaration of Dr. Michael T. Goodrich, Ph.D. in Support of Patent Owner's Preliminary Response
2002	Business Wire, "stimTV Network Wins Emmy Award from the National Television Academy; Technology & Engineering Emmy Award for Best Use of 'On Demand' Technology" (Jan. 10, 2007)
2003	National Television Academy, "National Television Academy Announces Emmy Winning Achievements: Honors Bestowed at 58th Annual Technology & Engineering Emmy Awards" (Jan. 8, 2007)
2004	M.J. Freedman, et al., "Geographic Locality of IP Prefixes," Internet Measurement Conference, 153-158 (2005)
2005	I. Poese, et al., "IP Geolocation Databases: Unreliable?" ACM SIGCOMM Computer Communication Review, Vol. 41, No. 2 (April 2011)
2006	Information Security Office Webpage – Separation of System Resources Guideline, available at https://security.berkeley.edu/separation-system-resources-guideline, dated Nov. 18, 2024
2007	J. William, "6 Reasons Why You Should Start Using A Multi Server Environment," available at https://www.temok.com/blog/multi-server-environment/, dated Nov. 7, 2019
2008	Petition for *Inter Partes* Review of U.S. Patent No. 9,923,947, *TikTok, Inc. v. NTECH Properties, Inc.*, No. IPR2024-01343, Paper 2 (P.T.A.B. Aug. 23, 2024)
2009	B. Gleeson, et al., "RFC 2764: A Framework for IP Based Virtual Private Networks," available at https://www.rfc-editor.org/rfc/rfc2764, dated Feb. 2000

Exhibit	Description
2010	Intentionally Omitted
2011	Intentionally Omitted
2012	Intentionally Omitted
2013	Intentionally Omitted
2014	Declaration of Michael T. Goodrich, Ph.D. in Support of Patent Owner's Response
2015	Tech Target webpage, definition of "streaming media" available at https://www.techtarget.com/whatis/definition/streaming-media, dated June 10, 2025
2016	Deposition transcript of Dr. Kevin Almeroth, *Tiktok Inc. v. NTECH Properties, Inc.*, IPR2024-01340 and IPR2024-01342, taken on May 30, 2025
2017	Thesaurus webpage, definition of "including" available at https://www.thesaurus.com/browse/including, dated May 31, 2025
2018	Vocabulary webpage, definition of "together with" available at https://www.vocabulary.com/dictionary/together with, dated May 31, 2025
2019	Lenovo webpage, "Data Signal Basics: What You Need to Know," available at https://www.lenovo.com/us/en/glossary/data-signal/?orgRef=https%253A%252F%252Fwww.google.com%252F, dated June 10, 2025
2020	Excerpts from Microsoft Computer Dictionary (5th ed. 2002)

Exhibit	Description
2021	Learnit webpage, "Networking data and signals" available at https://www.learnit.com/blog/networking-data-and-signals#:~:text=In, dated June 10, 2025
2022	Merriam-Webster webpage, definition of "access" available at https://www.merriam-webster.com/dictionary/access, dated May 31, 2025
2023	Information Security Office webpage – Separation of System Resources Guideline, available at https://security.berkeley.edu/separation-system-resources-guideline, dated Nov. 18, 2014
2024	Temok webpage, "6 Reasons Why You Should Start Using A Multi Server Environment," available at https://www.temok.com/blog/multi-server-environment/, dated Nov. 7, 2019
2025	Intentionally Omitted
2026	Intentionally Omitted
2027	Oxford Advanced Learner's Dictionary webpage, definition of "access" available at https://www.oxfordlearnersdictionaries.com/us/definition/english/access_2, dated June 10, 2025
2028	PC Mag webpage, definition of "access" available at https://www.pcmag.com/encyclopedia/term/access, dated June 5, 2025
2029	Customerly webpage, "Media Channel" available at https://www.customerly.io/glossary/media-channel/, dated May 13, 2025

Exhibit	Description
2030	Microsoft Learn webpage, "media Element," available at https://learn.microsoft.com/en-us/previous-versions/windows/desktop/wmp/media-element, dated April 25, 2023
2031	ScyllaDB webpage, "Real Time Data" available at https://www.scylladb.com/glossary/real-time-data/, dated May 6, 2025
2032	Deposition transcript of Dr. Kevin Almeroth, *TikTok Inc. v. NTECH Properties, Inc.*, IPR2024-01340 and IPR2024-01342, taken on October 16, 2025
2033	Patent Owner's Demonstratives

Dated: December 15, 2025

/James Hannah/

James Hannah (Reg. No. 56,369)
Kristopher Kastens (Reg. No. 57, 517)
Herbert Smith Freehills
Kramer (US) LLP
333 Twin Dolphin Drive, Suite 700
Redwood Shores, CA 94065
Telephone: (650) 752-1700
Facsimile: (650) 752-1800
james.hannah@hsfkramer.com
kris.kastens@hsfkramer.com

Jeffery H. Price (Reg. No. 69,141)
Jenna Fuller (Reg. No. 74,212)
Herbert Smith Freehills
Kramer (US) LLP
1177 Avenue of the Americas
New York, NY 10036
Telephone: (212) 715-9100
Facsimile: (212) 715-8000
jeffrey.price@hsfkramer.com
jenna.fuller@hsfkramer.com

Attorneys for Patent Owner
NTECH Properties, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. § 42.6(e), and pursuant to agreement by the parties that filing with the Board through the Patent Trial and Appeal Case Tracking System (P-TACTS) and e-mailing an electronic copy to counsel of record for Petitioner constitutes electronic service, service was made on Petitioner as detailed below.

Date of service	December 15, 2025
Manner of service	Electronic Filing and Electronic Mail (jimglass@quinnemanuel.com; ogizivojnovic@quinnemanuel.com; junzheng@quinnemanuel.com; qe-bytedance-ntech-iprs@quinnemanuel.com)
Documents served	PATENT OWNER'S UPDATED EXHIBIT LIST
Persons Served	Quinn Emanuel Urquhart & Sullivan LLP, James M. Glass Ognjen Zivojnovic Jun Zheng

/James Hannah/
James Hannah
Registration No. 56,369
Lead Counsel for Patent Owner