UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAP AMERICA, INC.,
Petitioner,

v.

CYANDIA, INC.,
Patent Owner.

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Case IPR2024-01432
U.S. Patent No. 8,751,948

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**PATENT OWNER'S UPDATED EXHIBIT LIST**

# PATENT OWNER'S UPDATED EXHIBIT LIST

| Exhibit | Description |
|---|---|
| 2001 | Order, *Netlist, Inc. v. Micron Technology, Inc., et al.*, Case No. 2:22-cv-00294-JRG, Dkt. No. 72 (E.D. Tex. Mar. 12, 2024) |
| 2002 | Order, *Netlist, Inc. v. Samsung Electronics Co., Ltd, Samsung Electronics America, Inc., Samsung Semiconductor Inc.*, Case No. 2:22-cv-00293-JRG, Dkt. No. 180 (E.D. Tex. Oct. 17, 2023) |
| 2003 | Order, *Netlist, Inc. v. Samsung Electronics Co., Ltd, Samsung Electronics America, Inc., Samsung Semiconductor Inc.*, Case No. 2:22-cv-00293-JRG, Dkt. No. 689 (E.D. Tex. Mar. 11, 2024) |
| 2004 | Excerpt from U.S. District Court – National Judicial Caseload Profile Federal for the Eastern District of Texas, available at https://www.uscourts.gov/sites/default/files/2024-12/fcms_na_distprofile0930.2024.pdf |
| 2005 | USPTO's June 21, 2022 Interim Procedure for Discretionary Denials in AIA Post-Grant Proceedings with Parallel District Court Litigation |
| 2006 | Docket Control Order, *Cyandia, Inc. v. SAP America, Inc. and SAP SE*, Case No. 2:24-cv-00096-JRG, Dkt. No. 32 (E.D. Tex. June 17, 2024) |
| 2007 | Declaration of James Hannah in Support of Patent Owner's Preliminary Response |
| 2008 | U.S. Patent Application No. 12/465,331 ("the May 2009 parent application") |
| 2009 | U.S. Patent No. 8,499,250 |
| 2010 | U.S Provisional Application No. 61/052,765 |

| Exhibit | Description |
|---|---|
| 2011 | Email correspondence between counsel for Cyandia and counsel for SAP, dated Feb. 14, 2025 |
| 2012 | Order, *Cyandia, Inc. v. SAP America, Inc. and SAP SE,* Case No. 2:24-cv-00096-JRG, Dkt. No. 85 (E.D. Tex. Mar. 27, 2025) |

Respectfully submitted,

Dated: March 28, 2025

/James Hannah/

James Hannah (Reg. No. 56,369)
Jenna Fuller (Reg. No. 74,212)
Kristopher Kastens (Reg. No. 57,517)
Kramer Levin Naftalis & Frankel LLP
333 Twin Dolphin Drive, Suite 700
Redwood Shores, CA 94065
Telephone: (650) 752-1700
jhannah@kramerlevin.com
jfuller@kramerlevin.com
kkastens@kramerlevin.com

Jeffrey H. Price (Reg. No. 69,141)
Kramer Levin Naftalis & Frankel LLP
1177 Avenue of the Americas
New York, NY 10036
Telephone: (212) 715-7502
jprice@kramerlevin.com

*Attorneys for Patent Owner*
Cyandia, 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 P-TACTS constitutes electronic service if Patent Owner sends an email notifying Petitioner of the filing, service was made on the Petitioner as detailed below.

| | |
|---|---|
| *Date of service* | March 28, 2025 |
| *Manner of service* | Electronic Filing with the Board (roy.chamcharas@klarquist.com; andrew.mason@klarquist.com; todd.siegel@klarquist.com; samuel.thacker@klarquist.com; SAP_Cyandia_IPRs@klarquist.com) |
| *Documents served* | PATENT OWNER'S UPDATED EXHIBIT LIST |
| *Persons Served* | KLARQUIST SPARKMAN, LLP, Roy Chamcharas, Andrew M. Mason, Todd M. Siegel, Samuel B. Thacker |

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