

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAP AMERICA, INC.,
Petitioner,

v.

CYANDIA, INC.,
Patent Owner.

Case IPR2024-01433
U.S. Patent No. 8,751,948

PATENT OWNER'S UPDATED EXHIBIT LIST

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Exhibit	Description
2001	Petition for <i>Inter Partes</i> Review of U.S. Patent No. 8,751,948, <i>SAP America, Inc. v. Cyandia, Inc.</i> , No. IPR2024-01432, Paper 1 (P.T.A.B. Sept. 20, 2024)
2002	Microsoft Computer Dictionary, Pages 23, 271, 475 (5th Ed. 2002)
2003	A. Sahami, et al., "Rich Tactile Output on Mobile Devices," <i>AmI</i> 2008, 210-21 (2008)
2004	I. Oakley, et al., "Did you feel something? Distracter tasks and the recognition of vibrotactile cues," <i>Interacting with Computers</i> 20, 354–363 (2008)
2005	T. S. Ueng, et al., "SMS ALERT SYSTEM AT NSRRC," <i>IEEE Particle Accelerator Conference (PAC)</i> (2007)
2006	Microsoft Learn webpage – "Application Gateway TCP/TLS proxy overview (Preview)," available at https://learn.microsoft.com/en-us/azure/application-gateway/tcp-tls-proxy-overview , dated Sept. 6, 2024
2007	IBM Dictionary of Computing, Pages 615-616 (10th Ed. 1993)
2008	IBM webpage, "Session data" available at https://www.ibm.com/docs/en/informix-servers/14.10?topic=memory-session-data , dated March 15, 2023
2009	Declaration of James Hannah in Support of Patent Owner's Preliminary Response
2010	Order, <i>Netlist, Inc. v. Micron Technology, Inc., et al.</i> , Case No. 2:22-cv-00294-JRG, Dkt. No. 72 (E.D. Tex. Mar. 12, 2024)
2011	Order, <i>Netlist, Inc. v. Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Semiconductor Inc.</i> , Case No. 2:22-cv-00293-JRG, Dkt. No. 180 (E.D. Tex. Oct. 17, 2023)

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IPR2024-01433 (U.S. Patent No. 8,751,948)

Exhibit	Description
2012	Order, <i>Netlist, Inc. v. Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Semiconductor Inc.</i> , Case No. 2:22-cv-00293-JRG, Dkt. No. 689 (E.D. Tex. Mar. 11, 2024)
2013	Excerpt from U.S. District Court – National Judicial Caseload Profile for the Eastern District of Texas, available at https://www.uscourts.gov/sites/default/files/2024-12/fcms_na_distprofile0930.2024.pdf
2014	USPTO's June 21, 2022 Interim Procedure for Discretionary Denials in AIA Post-Grant Proceedings with Parallel District Court Litigation
2015	Docket Control Order, <i>Cyandia, Inc. v. SAP America, Inc. and SAP SE</i> , Case No. 2:24-cv-00096-JRG, Dkt. No. 32 (E.D. Tex. June 17, 2024)
2016	Order, <i>Cyandia, Inc. v. SAP America, Inc.</i> , Case No. 2:24-cv-00096-JRG, Dkt. No. 85 (E.D. Tex. Mar. 27, 2025)
2017	Declaration of Michael T. Goodrich, Ph.D. in Support of Patent Owner's Response
2018	Excerpts from Pogue, David, "iPhone: The Missing Manual," O'Reilly Media, Inc., Pogue Press (1st Ed. August 2007)
2019	Koski, Heli, et al., "Innovation and Dominant Design in Mobile Telephony," <i>Industry and Innovation</i> , Vol. 14, No. 3, 305-324, July 2007, available at https://www.tandfonline.com/doi/abs/10.1080/13662710701369262
2020	Excerpts from Barney, Lee S., "Developing Hybrid Applications for the iPhone," Addison-Wesley, Pearson Education (2009)
2021	Li, Kevin A., et al., "PeopleTones: A System for the Detection and Notification of Buddy Proximity on Mobile Phones," <i>MobiSys '08</i> , June 17-20, 2008

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Exhibit	Description
2022	Deposition transcript of Christopher Schmandt, <i>SAP America, Inc. v. Cyandia, Inc.</i> , No. IPR2024-01433, taken on June 18, 2025
2023	Excerpts from Opening Expert Report of Paul C. Clark, DSc., <i>Cyandia, Inc. v. SAP America, Inc.</i> , Case No. 2:24-cv-00096-JRG (E.D. Tex.), served on May 16, 2025
2024	Excerpts from Plaintiff Cyandia, Inc.'s Reply Claim Construction Brief, <i>Cyandia, Inc. v. SAP America, Inc.</i> , Case No. 2:24-cv-00096-JRG, Dkt. No. 80 (E.D. Tex. Mar. 12, 2025)
2025	Excerpts from Defendants' Responsive Claim Construction Brief, <i>Cyandia, Inc. v. SAP America, Inc.</i> , Case No. 2:24-cv-00096-JRG, Dkt. No. 78 (E.D. Tex. Mar. 5, 2025)
2026	Excerpts from Dictionary of Computer and Internet Terms, Page 434 (10th Ed. 2009)
2027	Marti, Stefan, et al., "Giving the Caller the Finger: Collaborative Responsibility for Cellphone Interruptions," ACM (CHI 2005)
2028	Preliminary Constructions, <i>Cyandia, Inc. v. SAP America, Inc.</i> , Case No. 2:24-cv-00096-JRG (E.D. Tex.), dated April 24, 2025
2029	Intentionally omitted
2030	Deposition transcript of Christopher Schmandt, <i>SAP America, Inc. v. Cyandia, Inc.</i> , No. IPR2024-01433, taken on November 6, 2025, with deposition Exhibit 2029
2031	Patent Owner's Demonstratives

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IPR2024-01433 (U.S. Patent No. 8,751,948)

Respectfully submitted,

Dated: January 8, 2026

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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.

<i>Date of service</i>	January 8, 2026
<i>Manner of service</i>	Electronic Filing with the Board (andrew.mason@klarquist.com; roy.chamcharas@klarquist.com; todd.siegel@klarquist.com; samuel.thacker@klarquist.com; SAP_Cyandia_IPRs@klarquist.com)
<i>Documents served</i>	PATENT OWNER'S UPDATED EXHIBIT LIST
<i>Persons Served</i>	KLARQUIST SPARKMAN, LLP, Andrew M. Mason Roy Chamcharas, Todd M. Siegel, Samuel B. Thacker

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