Filed on behalf of Western Digital Technologies, Inc.
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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WESTERN DIGITAL TECHNOLOGIES, INC.,
Petitioner,

v.

GODO KAISHA IP BRIDGE 1,
Patent Owner.

Case No. IPR2024-01494
U.S. Patent No. 11,968,909

PETITIONER'S UPDATED EXHIBIT LIST

Pursuant to 37 C.F.R. § 42.63(e), Petitioner Western Digital Technologies, Inc. hereby provides a current list of its exhibits.

Exhibit No.	Description
1001	U.S. Patent No. 7,884,403 ("'403 Patent")
1002	File History for U.S. Patent No. 7,884,403
1003	U.S. Patent No. 8,319,263 ("'263 Patent")
1004	File History for U.S. Patent No. 8,319,263
1005	U.S. Patent No. 8,405,134 ("'134 Patent")
1006	File History for U.S. Patent No. 8,405,134
1007	U.S. Patent No. 9,123,463 ("'463 Patent")
1008	File History for U.S. Patent No. 9,123,463
1009	U.S. Patent No. 9,608,198 ("'198 Patent")
1010	File History for U.S. Patent No. 9,608,198
1011	U.S. Patent No. 10,367,138 ("'138 Patent")
1012	File History for U.S. Patent No. 10,367,138
1013	U.S. Patent No. 10,680,167 ("'167 Patent")
1014	File History for U.S. Patent No. 10,680,167
1015	U.S. Patent No. 11,737,372 ("'372 Patent")
1016	File History for U.S. Patent No. 11,737,372
1017	U.S. Patent No. 11,968,909 ("'909 Patent")
1018	File History for U.S. Patent No. 11,968,909
1019	Patent Family Tree
1020	Japanese Patent No. JP2004071186
1021	English Translation of Japanese Patent No. JP2004071186, from '372 Patent File History (EX1016)
1022	Japanese Patent Application No. JP2004313350
1023	Certified English Translation (with Translator Declaration) of Japanese Patent Application No. JP2004313350

Exhibit No.	Description
1024	Declaration of Jeffrey Bokor, Ph.D.
1025	CV of Jeffrey Bokor, Ph.D.
1026	Bowen et al., *Large magnetoresistance in Fe/MgO/FeCo(001) epitaxial tunnel junctions on GaAs(001)*, 79 Appl. Phys. Letters 1655-1657 (2001) ("Bowen")
1027	European Patent Application No. EP1391942A1 to Nagahama et al. ("Nagahama")
1028	Soukup et al., *Voltage-Current Characteristics for Electrical Conduction Through Thin MgO Films*, 41 J. Appl. Phys. 3229-3236 (1970) ("Soukup")
1029	Japanese Patent Application Publication No. JP2002204004A to Sunai et al. ("Sunai")
1030	Certified English Translation (with Translator Declaration) of Japanese Patent Application Publication No. JP2002204004A to Sunai et al. ("Sunai")
1031	Simmons, *Generalized Formula for the Electric Tunnel Effect between Similar Electrodes Separated by a Thin Insulating Film*, 34 J. Appl. Phys. 1793-1803 (1963)
1032	Trasatti, *Electronegativity, Work Function, and Heat of Adsorption of Hydrogen on Metals*, 67 J. Chem. Soc. 229-236 (1972)
1033	Jullière, *Tunneling between ferromagnetic* films, 54A Phys. Letters 225-226 (1975)
1034	Miyazaki et al., *Giant magnetic tunneling effect in Fe / $A1_2O_3$ / Fe junction*, 139 J. Magnetism & Magnetic Materials L231-L234 (1995)
1035	Moodera et al., *Large Magnetoresistance at Room Temperature in Ferromagnetic Thin Film Tunnel Junctions*, 74 Phys. Rev. Lett. 3273–3276 (1995)
1036	Wulff et al., *Characterization of MgO Layers on Different Alumina and Glass Substrates by Grazing Incidence Diffractometry and Grazing Incidence X-ray Reflectometry*, 23 Surface & Interface Analysis 148-154 (1995)

Exhibit No.	Description
1037	Castanier et al., *Oxygen vacancies on MgO(100)*, 364 Surf. Sci. 1-16 (1996)
1038	Moodera et al., *Ferromagnetic–insulator–ferromagnetic tunneling: Spin-dependent tunneling and large magnetoresistance in trilayer junctions (invited)*, 79 J. Appl. Phys. 4724-4729 (1996)
1039	Tehrani et al., *Progress and Outlook for MRAM Technology*, 35 IEEE Trans. Magn. 2814-2819 (1999)
1040	Yoon et al., *Growth characteristics and surface roughening of vapor-deposited MgO thin films*, 60 Phys. Rev. 2839-2843 (1999)
1041	Wollschläger et al., *Stoichiometry and morphology of MgO films grown reactively on Ag(100)*, 142 Appl. Surface Science 129-134 (1999)
1042	Pacchioni, *Ab initio theory of point defects in oxide materials: structure, properties, chemical reactivity*, 2 Solid State Scis. 161-179 (2000)
1043	Heinrich et al., *Single Crystal Tunnel Junctions*, IEEE (2000)
1044	Butler et al., *Spin-dependent tunneling conductance of Fe|MgO|Fe sandwiches*, 63 Phys. Rev. B 054416 (2001)
1045	Klaua et al., *Growth, structure, electronic, and magnetic properties of MgO/Fe(001) bilayers and Fe/MgO/Fe(001) trilayers*, 64 Phys. Rev. B. 134411 (2001)
1046	Mathon et al., *Theory of tunneling magnetoresistance of an epitaxial Fe/MgO/Fe(001) junction*, 63 Phys. Rev. 220403 (2001)
1047	Wulfhekel et al., *Single-crystal magnetotunnel junctions*, 78 Appl. Phys. Letters 509-511 (2001)
1048	Bogicevic et al., *Effect of oxide vacancies on metal island nucleation*, 515 Surf. Sci. L481-486 (2002)
1049	Kim et al., *MRAM Technology for High Density Memory Application*, 2 J. Semicond. Tech. Sci. 185-196 (2002)
1050	Yuasa et al., *A large quantum-well oscillation of the TMR effect*, 35 J. Phys. D. 2427-2431 (2002)
1051	Meyerheim, et al., *Geometrical and Compositional Structure at Metal-Oxide Interfaces: MgO on Fe(001)*, 87 Phys. Rev. Letters 076102 (2001)

Exhibit No.	Description
1052	Faure-Vincent et al., *High tunnel magnetoresistance in epitaxial Fe/MgO/Fe tunnel junctions*, 82 App. Phys. Letters 4507-4509 (2003)
1053	Mitani et al., *Fe/MgO/FeCo(100) epitaxial magnetic tunnel junctions prepared by using in situ plasma oxidation*, 93 J. Appl. Phys. 8041-8043 (2003)
1054	Goniakowski et al., *Electronic States and Schottky Barrier Height at Metal/MgO(100) Interfaces*, 12 Interface Science 93–103 (2004).
1055	Wang et al., *70% TMR at Room Temperature for SDT Sandwich Junctions With CoFeB as Free and Reference Layers*, 40 IEEE Trans. Magn. 2269-2271 (2004)
1056	U.S. Patent Publication No. 2004/0136232A1 ("Hosomi")
1057	Dieny et al., *Introduction to Magnetic Random-Access Memory* (IEEE Press 2017) (excerpts)
1058	Amodeo et al., *Dislocations and Plastic Deformation in MgO Crystals: A Review*, 8 Crystals 240 (2018)
1059	Matthews et al., *Comment: "Generalized formula for the electric tunnel effect between similar electrodes separated by a thin insulating film,"* 123 J. Appl. Phys. 136101 (2018)
1060	Jimbo et al., *Thermal stability of spin valves using amorphous CoFeB*, 165 J. Magnetism & Magnetic Materials 308-311 (1997)
1061	Cardoso et al., *Ferromagnetic Coupling Field Reduction in CoFeB Tunnel Junctions Deposited by Ion Beam*, 40 IEEE Trans. Magn. 2272-2274 (2004)
1062	U.S. Patent No. 7,270,896 ("Parkin")
1063	Complaint, *Godo Kaisha IP Bridge 1 v. Western Digital Corporation*, Case No. 24-cv-00342-RGA (D. Del. Mar. 15, 2024) (without exhibits)
1064	Claim Chart for '403 Patent, Exhibit D to Complaint, *Godo Kaisha IP Bridge 1 v. Western Digital Corporation*, Case No. 24-cv-00342-RGA (D. Del. Mar. 15, 2024)

Exhibit No.	Description
1065	Claim Chart for ’263 Patent, Exhibit E to Complaint, *Godo Kaisha IP Bridge 1 v. Western Digital Corporation*, Case No. 24-cv-00342-RGA (D. Del. Mar. 15, 2024)
1066	Claim Chart for ’372 Patent, Exhibit F to Complaint, *Godo Kaisha IP Bridge 1 v. Western Digital Corporation*, Case No. 24-cv-00342-RGA (D. Del. Mar. 15, 2024)
1067	First Amended Complaint, *Godo Kaisha IP Bridge 1 v. Western Digital Corporation*, Case No. 24-cv-00342-RGA (D. Del. July 8, 2024)
1068	Amended Claim Chart for ’403 Patent, Exhibit AA to First Amended Complaint, *Godo Kaisha IP Bridge 1 v. Western Digital Corporation*, Case No. 24-cv-00342-RGA (D. Del. July 8, 2024)
1069	Amended Claim Chart for ’263 Patent, Exhibit BB to First Amended Complaint, *Godo Kaisha IP Bridge 1 v. Western Digital Corporation*, Case No. 24-cv-00342-RGA (D. Del. July 8, 2024)
1070	Amended Claim Chart for ’372 Patent, Exhibit CC to First Amended Complaint, *Godo Kaisha IP Bridge 1 v. Western Digital Corporation*, Case No. 24-cv-00342-RGA (D. Del. July 8, 2024)
1071	Claim Chart for ’909 Patent, Exhibit DD to First Amended Complaint, *Godo Kaisha IP Bridge 1 v. Western Digital Corporation*, Case No. 24-cv-00342-RGA (D. Del. July 8, 2024)
1072	Claim Chart for ’138 Patent, Exhibit EE to First Amended Complaint, *Godo Kaisha IP Bridge 1 v. Western Digital Corporation*, Case No. 24-cv-00342-RGA (D. Del. July 8, 2024)
1073	Claim Chart for ’198 Patent, Exhibit FF to First Amended Complaint, *Godo Kaisha IP Bridge 1 v. Western Digital Corporation*, Case No. 24-cv-00342-RGA (D. Del. July 8, 2024)
1074	Claim Chart for ’463 Patent, Exhibit GG to First Amended Complaint, *Godo Kaisha IP Bridge 1 v. Western Digital Corporation*, Case No. 24-cv-00342-RGA (D. Del. July 8, 2024)
1075	Claim Chart for ’167 Patent, Exhibit HH to First Amended Complaint, *Godo Kaisha IP Bridge 1 v. Western Digital Corporation*, Case No. 24-cv-00342-RGA (D. Del. July 8, 2024)

Exhibit No.	Description
1076	Claim Chart for ’134 Patent, Exhibit II to First Amended Complaint, *Godo Kaisha IP Bridge 1 v. Western Digital Corporation*, Case No. 24-cv-00342-RGA (D. Del. July 8, 2024)
1077	Docket, *Godo Kaisha IP Bridge 1 v. Western Digital Corporation*, Case No. 24-cv-00342-RGA (D. Del. Mar. 15, 2024)
1078	U.S. District Courts – Combined Civil and Criminal Federal Court Management Statistics (Dec. 31, 2023), https://www.uscourts.gov/statistics-reports/federal-court-management-statistics-december-2023 (excerpts)
1079	Microsoft Computer Dictionary (5th ed. 2002) (excerpts)
1080	Order Granting Motion to Transfer Venue to Northern District of California, *Godo Kaisha IP Bridge 1 v. Western Digital Corporation*, Case No. 24-cv-00342-RGA (D. Del. Sept. 4, 2024)
1081	U.S. Patent No. 7,751,156 (’156 Patent)
1082	U.S. Patent No. 8,427,791 (’791 Patent)
1083	U.S. Patent No. 8,914,970 (’970 Patent)
1084	RESERVED
1085	Joint Stipulation and Order to Stay Litigation Pending *Inter Partes* Review, *Godo Kaisha IP Bridge 1 v. Western Digital Technologies*, Case No. 24-cv-06555-RS, Dkt. No. 55 (N.D. Cal. Oct. 10, 2024)
1086	File History for U.S. Patent Application No. 18/232,576
1087-1095	RESERVED
1096	Transcript of June 13, 2025 Conference Call with Patent Trial and Appeal Board
1097-1100	RESERVED
1101	Transcript of Deposition of Caroline A. Ross, Ph.D., taken September 18, 2025
1102	Transcript of Deposition of Caroline A. Ross, Ph.D., taken September 19, 2025
1103-1104	RESERVED

Exhibit No.	Description
1105	Reply Declaration of Jeffrey Bokor, Ph.D.
1106	Giordano et al., *Characteristics of Pd adsorption on the MgO(100) surface: Role of oxygen vacancies*, 64 Physical Review B 075417 (2001)
1107	Transcript of Deposition of Caroline A. Ross, Ph.D., taken December 11, 2025
1108	Petitioner's Demonstratives for Oral Hearing

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CERTIFICATE OF SERVICE

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a true copy of the foregoing **PETITIONER'S UPDATED EXHIBIT LIST** and **EX1108** are being served electronically on January 21, 2026 to the following counsel for Patent Owner to the following email addresses:

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