

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAP AMERICA, INC.,
Petitioner,

v.

CYANDIA, INC.,
Patent Owner.

Case IPR2024-01496
U.S. Patent No. 8,595,641

PATENT OWNER'S UPDATED EXHIBIT LIST

PATENT OWNER'S UPDATED EXHIBIT LIST

Exhibit	Description
2001	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)
2002	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)
2003	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)
2004	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
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, <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)
2007	Declaration of James Hannah in Support of Patent Owner's Preliminary Response
2008	Email correspondence between counsel for Cyandia and counsel for SAP, dated February 14, 2025
2009	Order, <i>Cyandia, Inc. v. SAP America, Inc. and SAP SE</i> , Case No. 2:24-cv-00096-JRG, Dkt. No. 85 (E.D. Tex. Mar. 27, 2025)

Patent Owner's Updated Exhibit List
IPR2024-01496 (U.S. Patent No. 8,595,641)

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.

<i>Date of service</i>	March 28, 2025
<i>Manner of service</i>	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)
<i>Documents served</i>	PATENT OWNER'S UPDATED EXHIBIT LIST
<i>Persons Served</i>	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