Paper No. 9

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,

Petitioner,

v.

NETLIST, INC.,

Patent Owner

Case IPR2025-00002
Patent 11,880,319

PETITIONER'S UPDATED EXHIBIT LIST

EXHIBIT LIST

Exhibit #	Description
1001	U.S. Patent No. 11,880,319
1002	File History of U.S. Patent No. 11,880,319
1003	Declaration of Donald Alpert
1004	Curriculum Vitae of Donald Alpert
1005	File History of U.S. Patent Application No. 15/088,115 (i.e., U.S. Patent No. 9,858,218)
1006	File History of U.S. Patent Application No. 13/942,721 (i.e., U.S. Patent No. 9,311,116)
1007	File History of U.S. Patent Application No. 12/815,339 (i.e., U.S. Patent No. 8,489,837)
1008	U.S. Provisional App. No. 61/186,799
1009	U.S. Patent Publication No. 2010/0042778 to Tanguay et al.
1010	U.S. Patent Publication No. 2003/0115427 to Roohparvar
1011	U.S. Patent Publication No. 2010/0202240 to Moshayedi et al.
1012	U.S. Patent Publication No. 2008/0256281 to Fahr et al.
1013	U.S. Patent Publication No. 2010/0142383 to Goishi et al.
1014	U.S. Patent Publication No. 2008/0098277 to Hazelzet
1015	JEDEC COMMITTEE LETTER BALLOT, LRDIMM DDR3 Memory Initialization Chapter Proposal (Dec. 2009) ("JEDEC")
1016	U.S. Patent No. 8,139,430 to Buchmann et al.
1017	U.S. Patent No. 8,359,521 to Kim et al.
1018	U.S. Patent No. 8,407,441 to Giovannini et al.

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1019	U.S. Patent No. 8,489,837 to Lee
1020	U.S. Patent No. 3,414,781 to Dill
1021	*SK hynix Inc. et al. v. Netlist, Inc.*, IPR2017-00548, Exhibit 1021, (PTAB December 11, 2017) (Deposition of Robert J. Murphy in 837 Patent IPR)
1022	U.S. Patent Application Pub. 2008/0147897 to Talbot
1023	U.S. Patent Application Pub. 2008/0155378 to Amidi
1024	JEDEC Standard, Double Data Rate (DDR) SDRAM Specification, JESD79 (June 2000) ("JESD79")
1025	JEDEC Standard, FBDIMM: Architecture and Protocol (January 2007) ("JESD206")
1026	JEDEC Standard, FBDIMM Advanced Memory Buffer (AMB) (March 2009) ("JESD82-20A")
1027	U.S. Patent No. 7,411,862 to Hein et al.
1028	US Patent App. Publication No. 2006/0277355 by Ellsberry et al.
1029	JEDEC Standard, Low Power Double Data Rate (LPDDR) SDRAM Specification (August 2007) ("JESD209")
1030	U.S. Patent Pub. No. 2007/0008791 to Butt
1031	U.S. Patent No. 9,535,623 (623 Patent)
1032	*SK hynix, Inc. et al. v. Netlist, Inc.*, IPR2018-00303, Paper No. 1 (PTAB December 14, 2017) (623 Patent IPR Petition)
1033	*SK hynix, Inc. et al. v. Netlist, Inc.*, IPR2018-00303, Exhibit 1003 (PTAB December 14, 2017) (Alpert Declaration in 623 Patent IPR)
1034	*SK hynix, Inc. et al. v. Netlist, Inc.*, IPR2018-00303, Paper No. 42 (PTAB March 21, 2019) (623 Patent Final Written Decision)

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1035	*SK hynix Inc. et al. v. Netlist, Inc.*, IPR2017-00548, Paper No. 25 (PTAB May 3, 2018) (837 Patent Final Written Decision)
1036	JEDEC COMMITTEE LETTER BALLOT, DDR3 LRDIMM Design Specification Body (Dec. 2009)
1037	JEDEC, Compilation of Tallies for JC-40 CMOS Digital Logic and point committees (Dec. 4, 2009)
1038	File History of U.S. Patent Application No. 15/169,745 (i.e., U.S. Patent No. 9,535,623)
1039	Inphi Corporation, "MB Initialization sequence Item 142.35," June 4, 2009
1040	U.S. Patent No. 8,386,737 to Jeon et al.
1041	Petitioner's Reply, *SK hynix Inc. et al. v. Netlist, Inc.*, IPR2017-00548, Paper 14 (PTAB December 11, 2017).
1042	"Sequence," https://www.lexico.com/en/definition/sequence
1043	U.S. Patent No. 7,222,213 to James
1044	Texas Instruments, "*28-Bit to 56-Bit Registered Buffer with Address Parity Test One Pair to Four Pair Differential Clock PLL Driver*" (October 2008)
1045	Micron, "*High-Speed DRAM Controller Design*" (2008)
1046	JEDEC, "*Minutes of Meeting No. 158 JC-40 Digital Logic Committee*" (June 4, 2009)
1047	*SK hynix Inc. et al. v. Netlist, Inc.*, IPR2017-00548, Exhibit 2009, (PTAB September 6, 2017)
1048	JEDEC, JEDEC Manual of Organization and Procedure, JM21P (Rev. of JM21N, May 2008) (May 2010)

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1049	JEDEC, JEDEC Manual of Organization and Procedure, JM21N (Rev. of JM21M, December 2006) (May 2008)
1050	Declaration of Julie Carlson
1051	JEDEC, "Committee Letter Ballot, JC-40.4-09-320, Item 142.35," (Dec. 2009)
1052	JEDEC, "Committee Letter Ballot, JC-45.4-09-321, Item 2192.44," (Dec. 2009)
1053	JEDEC, "Tally of Votes, Committee Letter Ballot, JC-45.4-09-321, 2192.44" (Dec. 9, 2009)
1054	Declaration of John Halbert
1055	Declaration of Sung Joo Park
1056	JEDEC Standard, DDR3 SDRAM, JESD79-3C (November 2008) ("JESD79-3C")
1057	U.S. Patent No. 7,647,467 to Hutsell et al.
1058	*SK hynix Inc. et al. v. Netlist, Inc.*, IPR2020-1042, Paper No. 1 (PTAB June 8, 2020) (595 Patent Petition)
1059	*SK hynix Inc. et al. v. Netlist, Inc.*, IPR2020-1042, Paper No. 14 (PTAB December 17, 2020) (595 Patent Institution Decision)
1060	*SK hynix Inc. et al. v. Netlist, Inc.*, IPR2020-1042, Paper No. 25 (PTAB May 6, 2021) (595 Patent Termination Order)
1061	*Netlist, Inc. v. SK hynix Inc. et al.*, 6-20-cv-00194-ADA (W.D. Tex. March 12, 2021) (Claim Construction Order)
1062	*SK hynix Inc. et al. v. Netlist, Inc.*, IPR2020-1044, Paper No. 1 (PTAB June 8, 2020) (218 Patent Institution Decision)
1063	Netlist's 8-K announcing patent cross license with Samsung on November 12, 2015

Exhibit #	Description
1064	Defendant Samsung's Motion for Judgment on the Pleadings in *Netlist Inc. v. Samsung Electronics Co., Ltd.*, No. 8:20-cv-00993, ECF No. 60 (C.D. Cal. June 22, 2021)
1065	Order denying Samsung's Motion for Judgment on the Pleadings in *Netlist Inc. v. Samsung Electronics Co., Ltd.*, No. 8:20-cv-00993, ECF No. 120 (C.D. Cal. Aug. 5, 2021)
1066	Plaintiff Netlist's Motion for Partial Summary Judgment in *Netlist Inc. v. Samsung Electronics Co., Ltd.*, No. 8:20-cv-00993, ECF No. 145 (C.D. Cal. Aug. 16, 2021)
1067	Complaint for Declaratory Judgment of Non-Infringement in *Samsung Electronics Co., Ltd. et al. v. Netlist, Inc.*, No. 1:21-cv-01453 (D. Del. filed Oct. 15, 2021)
1068	First Amended Complaint for Declaratory Judgment of Non-Infringement and Unenforceability; Breach of Contract, *Samsung Electronics Co., Ltd. et al. v. Netlist, Inc.*, No. 1:21-cv-01453 (D. Del. filed Jan. 18, 2022)
1069	Tektronix Application Note, *Electrical Verification of DDR Memory* (2009)
1070	Bruce Jacob et al., *Memory Systems: Cache, DRAM, Disk* (2008)
1071	JEDEC's 2009 Meeting Schedule (Apr. 6, 2009), https://web.archive.org/web/20090406143859/ http://www.jedec.org/service_members/ Meetings/09Sch.cfm
1072	JEDEC's Catalogue (Apr. 21, 2009), http://web.archive.org/web/20090421000459/ http://www.jedec.org/Catalog/display.cfm
1073	Join JEDEC (Apr. 10, 2009), https://web.archive.org/web/20090410060243/ http:/www.jedec.org/join_jedec/default.cfm

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1074	JEDEC Member Companies (May 5, 2009), https://web.archive.org/web/20090505225114/ http://www.jedec.org/service_members/ New_Members/memberco.cfm
1075	JEDEC Benefits (Apr. 13, 2009), https://web.archive.org/web/20090413045324/ http:/www.jedec.org/join_jedec/benefits.cfm
1076	Declaration by the Internet Archive for Exhibits 1071–75 (Aug. 5, 2022)
1077	Transcript of Deposition of Robert J. Murphy (Oct. 27, 2022)
1078	Redline comparing Declaration of Robert J. Murphy in IPR2022-00064 (595 Patent) [Ex. 1106] to Declaration of Robert J. Murphy in IPR2022-00062 (218 Patent) [Ex. 1105]
1079	Netlist's Technology Tutorial
1080	[Replaced by Exhibit 1081] Annotation of DDR3 LRDIMM showing location of (1) Host Interface CA Clk-to-CMD Training, (2) MB Initialization, (3) MB-DRAM Training, and (4) Host-MB Training
1081	Corrected annotation of DDR3 LRDIMM showing location of (1) Host Interface CA Clk-to-CMD Training, (2) MB Initialization, (3) MB-DRAM Training, and (4) Host-MB Training
1082	Petitioner's Demonstratives for Oral Argument on February 15, 2023
1083	JEDEC 21-C Standard, DDR SDRAM Registered DIMM (Jan. 2002)
1084	JESD79-2B, JEDEC DDR2 SDRAM Standard (Jan. 2005)
1085	JESD79-3, JEDEC DDR3 SDRAM Standard (June 2007) (Exhibit 1037 in IPR2018-00303)
1086	JEDEC's Catalogue (July 27, 2004), https://web.archive.org/web/20040727032111/ http://www.jedec.org/Catalog/display.cfm

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1087	JEDEC download page for JESD99A.01 (Nov. 26, 2003), https://web.archive.org/web/20031126173530/ http://www.jedec.org/download/search/jesd99a01.pdf
1088	JEDEC Standard JESD99A.01, *Terms, Definitions, and Letter Symbols for Microelectronics Devices* (May 2003)
1089	Harold S. Stone, *Microcomputer Interfacing* (1982)
1090	U.S. Patent No. 8,386,722 to Wang et al.
1091	Deposition of John Bentley Halbert, III (July 22, 2022) [Exhibit 2022 in IPR2022-00062 and -00064]
1092	Deposition of Julie Carlson (July 22, 2022) [Exhibit 2024 in IPR2022-00062 and -00064]
1093	Deposition of Sung Joo Park (July 28, 2022) [Exhibit 2025 in IPR2022-00062 and -00064]
1094	U.S. Patent No. 9,311,116 (issued Apr. 12, 2016)
1095	U.S. Patent No. 9,858,218 (issued Jan. 2, 2018)
1096	File History of U.S. Patent No. 10,474,595
1097	U.S. Patent No. 10,474,595
1098	Petition of *Inter Partes* Review of U.S. Patent No. 9,858,218, IPR2022-00062, Paper No. 1 (PTAB Oct. 15, 2021)
1099	Declaration of Dr. Donald Alpert Regarding U.S. Patent No. 9,858,218, IPR2022-00062, Exhibit 1003 (PTAB Oct. 15, 2021)
1100	Petition of *Inter Partes* Review of U.S. Patent No. 10,474,595, IPR2022-00064, Paper No. 1 (PTAB Oct. 15, 2021)
1101	Declaration of Dr. Donald Alpert Regarding U.S. Patent No. 10,474,595, IPR2022-00064, Exhibit 1003 (PTAB Oct. 15, 2021)

Exhibit #	Description
1102	Final Written Decision, IPR2022-00062, Paper No. 54 (PTAB May 8, 2023) (U.S. Patent No. 9,858,218)
1103	Final Written Decision, IPR2022-00064, Paper No. 54 (PTAB May 9, 2023) (U.S. Patent No. 10,474,595)
1104	Order dismissing appeals of IPR2022-00062 and -00064, *Netlist, Inc. v. Samsung Electronics Co., Ltd.*, No. 23-2182 (Fed. Cir. Oct. 19, 2023)
1105	Declaration of Robert J. Murphy, Ex. 2027 in IPR2022-00062 (218 Patent)
1106	Declaration of Robert J. Murphy, Ex. 2027 in IPR2022-00064 (595 Patent)
1107	Deposition of Steven Przybylski (Feb. 15–16, 2024)
1108	Institution Decision, IPR2022-00062, Paper No. 14 (PTAB May 16, 2022) (U.S. Patent No. 9,858,218)
1109	Institution Decision, IPR2022-00064, Paper No. 14 (PTAB May 16, 2022) (U.S. Patent No. 10,474,595)
1110	U.S. Patent Application No. 12/144,396 to Wang (filed June 23, 2008)
1111	U.S. Patent No. 11,386,024
1112	File History of U.S. Patent No. 11,386,024
1113	*Interim Procedure for Discretionary Denials in AIA Post-Grant Proceedings with Parallel District Court Litigation* (June 21, 2022)
1114	Complaint for Declaratory Judgment of Non-Infringement in *Samsung Electronics Co., Ltd. et al. v. Netlist, Inc.*, No. 1:23-cv-01122 (D. Del. filed Oct. 9, 2023) (U.S. Patent No. 11,386,024)

Exhibit #	Description
1115	Complaint for Declaratory Judgment of Non-Infringement in *Samsung Electronics Co., Ltd. et al. v. Netlist, Inc.*, No. 1:24-cv-00614 (D. Del. filed May 22, 2024) (U.S. Patent No. 11,880,319)
1116 [NEW]	"Minutes of Meeting No. 160 JC-40 Digital Logic Committee," December 10, 2009 [original non-confidential version of Exhibit 2002]
1117 [NEW]	"Simplified File Naming: JEDEC Meeting Presentations," JEDEC, December 2010 [original non-confidential version of Exhibit 2005]
1118 [NEW]	JEDEC File Naming Convention, JM19.02 (Dec. 2005), *available at* <https://web.archive.org/web/20081118133245/http://www.jedec.org./Home/manuals/default.cfm>, <https://web.archive.org/web/20061210110839/http://www.jedec.org/Home/manuals/jm19-02.PDF>

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 14th day of March, 2025, **Petitioner's Updated Exhibit List** and **Exhibits 1116–18** were served by email on the following counsel for Patent Owner:

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