

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,
Petitioner,

v.

INTELLECTUAL VENTURES II LLC,
Patent Owner.

IPR2025-00220
U.S. Patent No. 11,206,670

PETITIONER'S UPDATED EXHIBIT LIST

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April 21, 2026

Ex.1001	U.S. Patent No. 11,206,670 to P. Young (“’670 patent”)
Ex.1002	Prosecution File History of U.S. Patent Application No. 17/184,127 issued as the ’670 Patent (“’670 File History”)
Ex.1003	Declaration of Zhi Ding, Ph.D. under 37 C.F.R. § 1.68
Ex.1004	Curriculum Vitae of Zhi Ding, Ph.D.
Ex.1005	U.S. Patent Application Publication No. 2012/0327895 by A. Wallen et al. (“Wallen”)
Ex.1006	U.S. Provisional Application No. 61/501,547 (“Wallen-Prov”)
Ex.1007	U.S. Patent Application Publication No. 2011/0269475 to F. Berggren et al. (“Berggren”)
Ex.1008	WIPO Publication WO 2010/117240 to M. Noh et al. (“Noh”)
Ex.1009	WIPO Publication WO 2012/084001 to M. Sagfors, et al. (“Sagfors”)
Ex.1010	U.S. Patent Application Publication No. 2012/0327894 to J. Axmon et al. (“Axmon”)
Ex.1011	U.S. Provisional Application No. 61/501,310 to J. Axmon et al. (“Axmon-Prov”)
Ex.1012	Prosecution history of U.S. Patent No. 10,939,446
Ex.1013	IV’s Preliminary Infringement Contentions for the ’670 patent, <i>Intellectual Ventures II, LLC v. Tesla, Inc.</i> , No. 6:24-cv-188-ADA (WDTX)
Ex.1014	IV’s Complaint, <i>Intellectual Ventures II, LLC v. Tesla, Inc.</i> , No. 6:24-cv-188-ADA (WDTX)

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Ex.1015	Proposed Scheduling Order, <i>Intellectual Ventures II, LLC v. Tesla, Inc.</i> , No. 6:24-cv-188-ADA (WDTX)
Ex.1016	Statistics on District Court Timing
Ex.1017	Interim Procedure for Discretionary Denials in AIA Parallel District Court Litigation, June 21, 2022
Ex.1018	GB 1201000, filed January 20, 2012
Ex.1019	U.S. Patent Application Publication No. 2013/0083749 to H. Xu et al.
Ex.1020	IV's Preliminary Infringement Contentions Cover Pleading, <i>Intellectual Ventures II, LLC v. Tesla, Inc.</i> , No. 6:24-cv-188-ADA (WDTX)
Ex.1021	Statistics on District Court Timing (Dec. 31, 2024)
Ex.1022	WDTX 2024 Statistical Public Report, available at https://www.txwd.uscourts.gov/court-information/district-statistics/
Ex.1023	Amended Order Assigning the Business Of the Court (Judge Moses, Jan. 31, 2025)
Ex.1024	LexMachina docket report
Ex.1025	LexMachina docket report
Ex.1026	"Albright Worried Multipatent Trials Ask Too Much Of Jurors," Law360 (Dec. 18, 2020), at https://www.law360.com/articles/1337976/albright-worriedmultipatent-trials-ask-too-much-of-jurors
Ex.1027	Bifurcation Order – Videolabs, Inc. v. Asustek Computer, Inc. 6:22-cv-00720-ADA (WDTX)
Ex.1028	Joint Claim Construction Statement, <i>Intellectual Ventures II, LLC v. Tesla, Inc.</i> , No. 6:24-cv-188-ADA (WDTX)
Ex.1029	"The economic contributions of Tesla to the California economy,

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	2018–2021,” IHS Markit (Oct. 2022), available at https://digitalassets.tesla.com/tesla-contents/image/upload/Tesla-California-Economic-Impact-Final-Report-October-2022
Ex.1030	“Tesla’s ‘American-made’ cars won’t get hit as hard by the auto tariffs,” CNN.com, https://www.cnn.com/2025/03/29/cars/american-made-cars-tesla-auto-tariffs/index.html , retrieved Apr. 14, 2025
Ex.1031	“An Assessment of the Impact of the Inter Partes Review Process under the Patent Trial and Appeal Board on the US Economy,” The Perryman Group, available at https://www.perrymangroup.com/publications/report/2021/9/23/an-assessment-of-the-potential-impact-of-expanding-inter-partes-review-ipr-under-the-america-invents-act-on-the-us-economy/
Ex.1032	“Tesla’s California Footprint,” https://www.tesla.com/blog/teslas-california-footprint (retrieved Apr. 25, 2025)
Ex.1033	“FAQs for Interim Processes for PTAB Workload Management,” available at https://www.uspto.gov/patents/ptab/faqs/interim-processes-workload-management (retrieved May 13, 2025).
Ex.1034	Notice of <i>Sotera</i> Plus Stipulation for Defendant Tesla, Inc., <i>Intellectual Ventures II, LLC v. Tesla, Inc.</i> , 1:24-cv-884-ADA, ECF No. 59 (WDTX) (May 27, 2025)
Ex.1035	Defendant’s Final Invalidity Contentions, <i>Intellectual Ventures II, LLC v. Tesla, Inc.</i> , 1:24-cv-884-ADA (WDTX) (May 22, 2025)
Ex.1036	Deposition Transcript of Dr. Gary Lomp
Ex.1037	Second Declaration of Zhi Ding, Ph.D. under 37 C.F.R. § 1.68
Ex.1038	E. Dahlman et al., <i>4G LTE/LTE-Advanced for Mobile Broadband</i> (2011) (selected pages).
Ex.1039	U.S. Patent Application Publication No. 2012/0117140
Ex.1040	U.S. Patent Application Publication No. 2012/0039313
Ex.1041 (NEW)	Petitioner’s Oral Argument Demonstratives

Date: April 21, 2026

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Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies, under 37 C.F.R. § 42.6, that service was made on the Patent Owner as detailed below.

Date of service April 21, 2026

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Documents served ***PETITIONER'S UPDATED EXHIBIT LIST
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