

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,
Petitioner

v.

INTELLECTUAL VENTURES II LLC.,
Patent Owner

IPR2025-00221
U.S. Patent No. 11,664,889

PETITIONER'S UPDATED EXHIBIT LIST

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March 19, 2026

Ex.1001	U.S. Pat. No. 11,664,889 to Howard (“the ’889 patent”)
Ex.1002	Prosecution History of U.S. Pat. No. 11,664,889 (U.S. Application No. 17/870,425)
Ex.1003	Declaration of Dr. Michael Kotzin under 37 C.F.R. § 1.68
Ex.1004	<i>Curriculum Vitae</i> of Dr. Michael Kotzin
Ex.1005	U.S. Pat. No. 8,072,916 to Dateki
Ex.1006	Prosecution History of U.S. Pat. No. 8,811,356 (U.S. Application No. 13/176,298)
Ex.1007	3GPP Standard, TS 25.302, v.6.3.0
Ex.1008	Prabhakar Chitrapu, et al., “Wideband TDD: WCDMA for the Unpaired Spectrum,” (2004)
Ex.1009	U.S. Pat. Pub. No. 2002/0141331 to Mate et al. (“Mate”)
Ex.1010	Declaration of Sylvia Hall-Ellis, Ph.D.
Ex.1011	Andrew S. Tanenbaum, “Computer Networks,” 4th ed. (2002)
Ex.1012	United States Copyright Office Catalog Record for Andrew S. Tanenbaum, Computer Networks, 4th ed. (Ex.1012)
Ex.1013	Behrouz A. Forouzan, “Data Communications and Networking,” (3 rd ed. 2003)
Ex.1014	Copyright registration record for Forouzan (Ex.1013)
Ex.1015	IV’s Preliminary Infringement Contentions Cover Pleading, <i>Intellectual Ventures II, LLC v. Tesla, Inc.</i> , No. 6:24-cv-188-ADA (WDTX)
Ex.1016	<i>Reserved</i>

Ex.1017	IV's Complaint, <i>Intellectual Ventures II, LLC v. Tesla, Inc.</i> , No. 6:24-cv-188-ADA (WDTX)
Ex.1018	Proposed Scheduling Order, <i>Intellectual Ventures II, LLC v. Tesla, Inc.</i> , No. 6:24-cv-188-ADA (WDTX)
Ex.1019	Statistics on District Court Timing
Ex.1020	Interim Procedure for Discretionary Denials in AIA Parallel District Court Litigation, June 21, 2022
Ex.1021	U.S. Pat. No. 7,821,913 to Malladi et al.
Ex.1022	3GPP Proposal R1-031073 (referenced in Ex.1021)
Ex.1023	3GPP Standard TS 25.899 v. 6.0.0
Ex.1024	<i>Reserved</i>
Ex.1025	<i>Reserved</i>
Ex.1026	U.S. Pat. Pub. No. 2006/0141933 to Smee, et al.
Ex.1027	U.S. Pat. Pub. No. 2006/0025158 to LeBlanc, et al.
Ex.1028	U.S. Pat. Pub. No. 2005/0105487 to Rudolph, et al.
Ex.1029	<i>Reserved</i>
Ex.1030	<i>Reserved</i>
Ex.1031	U.S. Pat. Pub. No. 2005/0152265 to Denk
Ex.1032	U.S. Pat. Pub. No. 2005/0265279 to Markovic, et al.
Ex.1033	U.S. Pat. Pub. No. 20030219037 to Toskala et al.
Ex.1034	<i>Reserved</i>
Ex.1035	U.S. Pat. No. 7,493,133 to Krishnan et al. ("Krishnan")
Ex.1036-1051	<i>Reserved</i>
Ex.1052	Partial File History for U.S. Application No. 13/176,298
Ex.1053	Statistics on District Court Timing (Dec. 31, 2024)
Ex.1054	WDTX 2024 Statistical Public Report, available at https://www.txwd.uscourts.gov/court-information/district-statistics/
Ex.1055	Amended Order Assigning the Business Of the Court (Judge

	Moses, Jan. 31, 2025)
Ex.1056	LexMachina docket report
Ex.1057	LexMachina docket report
Ex.1058	“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.1059	Bifurcation Order – Videolabs, Inc. v. Asustek Computer, Inc. 6:22-cv-00720-ADA (WDTX)
Ex.1060	Joint Claim Construction Statement, <i>Intellectual Ventures II, LLC v. Tesla, Inc.</i> , 1:24-cv-884-ADA, ECF No. 37 (WDTX) (March 28, 2025)
Ex.1061	“The economic contributions of Tesla to the California economy, 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.1062	“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.1063	“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.1064	<i>Reserved</i>
Ex.1065	“Tesla’s California Footprint,” https://www.tesla.com/blog/teslas-california-footprint (retrieved Apr. 25, 2025)
Ex.1066	“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.1067	Notice of <i>Sotera Plus</i> 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.1068	Defendant's Final Invalidity Contentions, <i>Intellectual Ventures II, LLC v. Tesla, Inc.</i> , 1:24-cv-884-ADA (WDTX) (May 22, 2025)
Ex.1069	Deposition Transcript of Dr. Gary R. Lomp, Ph.D., January 12, 2026
Ex.1070	Supplemental Declaration of Michael D. Kotzin, Ph.D.
Ex.1071 (NEW)	Petitioner's Oral Argument Demonstratives

Respectfully submitted,

Dated: March 19, 2026
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CERTIFICATE OF SERVICE

The undersigned certifies that, in accordance with 37 C.F.R. § 42.6(e),
service was made on Patent Owner as detailed below.

Date of service March 19, 2026

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Documents served ***PETITIONER'S UPDATED EXHIBIT LIST;
EXHIBIT Ex.1071***

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