

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,
Petitioner

v.

INTELLECTUAL VENTURES II LLC.,
Patent Owner

IPR2025-00222
U.S. Patent No. 9,232,158

PETITIONER'S UPDATED EXHIBIT LIST

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March 19, 2026

Ex.1001	U.S. Pat. No. 9,232,158 to Olsen et al. ("the '158 patent")
Ex.1002	Prosecution History of U.S. Application No. 14/063,236 (issued as the '158 patent)
Ex.1003	Declaration of R. Michael Guidash under 37 C.F.R. § 1.68
Ex.1004	<i>Curriculum Vitae</i> of R. Michael Guidash
Ex.1005	U.S. Pat. No. 6,611,289 to Yu et. al
Ex.1006	U.S. Pat. No. 7,365,780 to Miyazaki
Ex.1007	JP Application Publication No. JP2003-319231 to Matsushima (Certified English Translation + Declaration + Japanese)
Ex.1008	Eastman Kodak Company, Shutter Operations for CCD and CMOS Image Sensors, Application Note, MTD/PS-0259, Revision 1 (October 23, 2001) (retrieved from https://web.archive.org/web/20030419002619/http://www.kodak.com/global/plugins/acrobat/en/digital/ccd/applicationNotes/ShutterOperations.pdf)
Ex.1009	Eastman Kodak Company, Kodak CMOS Image Sensors White Paper (November 10, 2000) (retrieved from https://web.archive.org/web/20010611235410/http://www.kodak.com/US/plugins/acrobat/en/digital/ccd/cmos.pdf)
Ex.1010	Eastman Kodak Company, Kodak Digital Science KAC-0311 Image Sensor (August 5, 2002) (retrieved from https://web.archive.org/web/20030411152500/http://www.kodak.com/global/plugins/acrobat/en/digital/ccd/products/cmos/KAC-0311LongSpec.pdf)
Ex.1011	U.S. Pat. No. 7,733,414 to Kobayashi
Ex.1012	Dave Litwiller, "CCD vs. CMOS: Facts and Fiction, Photonics

	Spectra” (January 2001)
Ex.1013	U.S. Application Pub. No. 2004/0239771 to Habe
Ex.1014	EP Application Pub. No. EP0858208 to Weldy et al.
Ex.1015	Memorandum in Support of Claim Construction Order, <i>Intellectual Ventures I LLC et al. v. General Motors Company et al.</i> , 6:21-CV-1088 (WDTX), December 1 st , 2022
Ex.1016	Texas Instruments, TC255P 336- × 244-PIXEL CCD IMAGE SENSOR (March 2003)
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	Eastman Kodak Company, Solid State Image Sensors Terminology, Application Note, DS 00-001, Revision 0 (December 8, 1994) (retrieved from https://web.archive.org/web/20030413064955/http://www.kodak.com/global/plugins/acrobat/en/digital/ccd/applicationNotes/terminology.pdf)
Ex.1022	U.S. Pat. No. 7,830,435 to Guidash
Ex.1023	Eastman Kodak Company, Charge Coupled Device (CCD) Image Sensors, CCD Primer, MTD/PS-0218, Revision No. 1 (May 29, 2001) (retrieved from https://web.archive.org/web/20030422183725/http://www.kodak.com/global/plugins/acrobat/en/digital/ccd/applicationNotes/chargeCoupledDevice.pdf)
Ex.1024	Szeliski, “Image Mosaicing for Tele-Reality Applications,” (May 1994)
Ex.1025	Mann et al., “On Being ‘Undigital’ with Digital Cameras: Extending Dynamic Range By Combining Differently Exposed

	Pictures,” (May 1995)
Ex.1026	Debevec et al., “Recovering High Dynamic Range Radiance Maps from Photographs,” SIGGRAPH ’97: Proceedings of the 24th annual conference on Computer graphics and interactive techniques, 369-378 (August 1997)
Ex.1027	PCT Pub. No. WO2001/010110 to Stark
Ex.1028	Yang et al., “A 640 512 CMOS Image Sensor with Ultrawide Dynamic Range Floating-Point Pixel-Level ADC,” IEEE Journal of Solid-State Circuits, VOL. 34, NO. 12 (December 1999)
Ex.1029	CCD Electronic Shutters, Interactive Java Tutorial, October 22, 2002 (retrieved from https://web.archive.org/web/20021028042044/https://micro.magnet.fsu.edu/primer/java/digitalimaging/ccd/shutter/index.html)
Ex.1030	Prosecution History of U.S. Application No. 11/212,803 (abandoned)
Ex.1031	Prosecution History of U.S. Application No. 11/788,122 (issued as U.S. Pat. No. 7,564,019)
Ex.1032	Prosecution History of U.S. Application No. 12/496,854 (issued as U.S. Pat. No. 8,198,574)
Ex.1033	Prosecution History of U.S. Application No. 13/465,229 (issued as U.S. Pat. No. 8,334,494)
Ex.1034	Prosecution History of U.S. Application No. 13/681,603 (issued as U.S. Pat. No. 8,598,504)
Ex.1035	Holst, CCD arrays, Cameras, and Displays, 2nd edition (1998)
Ex.1036	U.S. Pat. No. 4,831,403 to Ishida et al.
Ex.1037	U.S. Pat. No. 7443,427 to Takayanagi
Ex.1038	U.S. Pat. No. 4,642,679 to Nagano
Ex.1039	e2v Technologies, CCD Sensors Technical Note: Glossary of Terms (2003)
Ex.1040	Ralph E. Jacobson et al., The Manual of Photography: photographic and digital imaging, 9th Edition (2000)
Ex.1041	U.S. Pat. No. 6,215,597 to Duncan et al.

Ex.1042	O'Donnell, The Practical Use of the Exposure Triangle (retrieved from https://creativeraw.com/practical-use-exposure-triangle-explained/)
Ex.1043	U.S. Pat. No. 2,953,983 to Larson
Ex.1044	Supplemental Declaration of R. Michael Guidash under 37 C.F.R. § 1.68
Ex.1045	U.S. Pat. No. 7,564,019 to Olsen et al.
Ex.1046	U.S. Pat. No. 7,916,180 to Olsen et al. ("180 Patent")
Ex.1047	Prosecution History of U.S. Application No. 11/788,279 (issued as U.S. Pat. No. 7,916,180)
Ex.1048	Deposition of Eli Saber Transcript, IPR2025-00222 (December 1, 2025)
Ex.1049	Deposition of Eli Saber Transcript, IPR2025-00339 (December 8, 2025)
Ex.1050	Plaintiffs' Responsive Claim Construction Brief, <i>Intellectual Ventures I LLC et al. v. General Motors Company et al.</i> , 6:21-CV-1088 (WDTX) ("GM Litigation"), August 1 st , 2022
Ex.1051	Patent Owner's Response, IPR2025-00339 (October 17, 2025)
Ex.1052	RESERVED
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	’158 Patent Assignment Recordation
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</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.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 (NEW)	Petitioner’s Oral Argument Demonstratives

Respectfully submitted,

Dated: March 19, 2026
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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 March 19, 2026

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