

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAP AMERICA, INC. AND SAP SE
Petitioners,

v.

VALTRUS INNOVATIONS LTD. AND KEY PATENT INNOVATIONS LTD.
Patent Owner.

Case No. IPR2025-00414
U.S. Patent No. 7,152,182

PETITIONERS' UPDATED EXHIBIT LIST

UPDATED EXHIBIT LIST

No.	Description
1001	U.S. Patent No. 7,152,182 (“’182 Patent”)
1002	File History of U.S. Patent No. 7,152,182
1003	Declaration of Kevin C. Almeroth, Ph.D.
1004	<i>Curriculum Vitae</i> of Kevin C. Almeroth, Ph.D.
1005	U.S. Pub. No. 2003/0187847 (“ <u>Lubbers</u> ”)
1006	U.S. Patent No. 6,601,187 (“ <u>Sicola</u> ”)
1007	U.S. Pat. No. 5,901,327 (“ <u>Ofek</u> ”)
1008	Ramez Elmasri and Shamkant B. Navathe, FUNDAMENTALS OF DATABASE SYSTEMS (2d ed.1994)
1009	Original Complaint for Patent Infringement in <i>Valtrus Innovations Ltd. v. SAP America, Inc. et al</i> , 2:24-cv-00021- JRG (E.D. Tex.)
1010	Original Complaint for Patent Infringement in <i>Valtrus Innovations Ltd. v. SAP America, Inc. et al</i> , 2:24-cv-00533- JRG (E.D. Tex.)
1011	Director Vidal’s Memorandum Regarding Discretionary Denial Procedure, Dated June 21, 2022
1012	First Amended Docket Control Order in <i>Valtrus Innovations Ltd. v. SAP America, Inc. et al</i> , 2:24-cv-00021-JRG (E.D. Tex.)
1013	Motion to Dismiss for Lack of Standing (Public Version) in <i>Valtrus Innovations Ltd. v. SAP America, Inc. et al</i> , 2:24-cv- 00021-JRG (E.D. Tex.)
1014	Motion to Reconsider Ruling on Motion to Dismiss for Lack of Standing (Public Version) in <i>Valtrus Innovations Ltd. v. SAP America, Inc. et al</i> , 2:24-cv-00021-JRG (E.D. Tex.)
1015	Plaintiffs’ Notice Regarding <i>Valtrus II</i> in <i>Valtrus Innovations Ltd. v.</i>

No.	Description
	<i>SAP America, Inc. et al</i> , 2:24-cv-00021-JRG (E.D. Tex.)
1016	SAP's Invalidity Contentions (Cover Pleading) in <i>Valtrus Innovations Ltd. v. SAP America, Inc. et al</i> , 2:24-cv-00021- JRG (E.D. Tex.)
1017	SAP'S STIPULATION REGARDING INVALIDITY ASSERTIONS IN PARALLEL PROCEEDING

Dated: May 6, 2025

Respectfully submitted,

/ Louis L. Campbell /
Louis L. Campbell (Lead Counsel)
llcampbell@winston.com
USPTO Reg. No. 59,963
Winston & Strawn LLP
255 Shoreline Dr., Ste. 520
Redwood City, CA 94065
T: (650) 858-6500, F: (650) 858-6550

Lead Counsel for Petitioners

CERTIFICATE OF SERVICE

Under 37 C.F.R. §§ 42.6(e) and 42.105(a), this is to certify that on May 6, 2025, I caused to be served a true and correct copy of the foregoing **“PETITIONERS’ UPDATED EXHIBIT LIST”** and accompanying exhibit by Federal Express priority overnight mail on the following:

Botos Churchill IP Law LLP
430 Mountain Avenue
Suite 401
New Providence, NJ 07974

With a courtesy copy of the foregoing document and accompanying exhibit were also served on litigation counsel for Patent Owners via email:

Matt Berkowitz
mberkowitz@reichmanjorgensen.com
Patrick R. Colsher
pcolsher@reichmanjorgensen.com
Aaron Morris
amorris@reichmanjorgensen.com
Navid Cyrus Bayar
nbayar@reichmanjorgensen.com

Reichman Jorgensen Lehman & Feldberg LLP
100 Marine Parkway
Suite 300
Redwood Shores, CA 94065

Khue Van Hoang
khoang@reichmanjorgensen.com
Reichman Jorgensen Lehman & Feldberg LLP
400 Madison Avenue
Suite 14d
New York, NY 1001

Philip Eklem
peklem@reichmanjorgensen.com
Savannah Harman Carnes
scarnes@reichmanjorgensen.com
Reichman Jorgensen Lehman & Feldberg LLP
1909 K Street, NW
Suite 800
Washington, DC 20006

/Louis L. Campbell/
Louis L. Campbell (Lead Counsel)
llcampbell@winston.com
USPTO Reg. No. 59,963
Winston & Strawn LLP 255
Shoreline Dr., Ste. 520
Redwood City, CA 94065
T: (650) 858-6500, F: (650) 858-6550

Lead Counsel for Petitioner