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. IPR2025-00417
U.S. Patent No. 6,823,409

PETITIONERS' UPDATED EXHIBIT LIST

UPDATED EXHIBIT LIST

No.	Description
1001	U.S. Patent No. 6,823,409
1002	U.S. Patent No. 6,487,643 ("Khare")
1003	SAP's Invalidity Contentions (Cover Pleading) in *Valtrus Innovations Ltd. v. SAP America, Inc. et al*, 2:24-cv-00021-JRG (E.D. Tex.)
1004	U.S. Patent No. 6,581,063 ("Kirkman")
1005	Interim Procedure for Discretionary Denials in AIA Post-Grant Proceedings with Parallel District Court Litigation by Director Katherine K. Vidal
1006	Declaration of Dr. Bruce Jacob
1007	*Curriculum Vitae* of Dr. Bruce Jacob
1008	File History of U.S. Patent No. 6,823,409
1009	First Amended Docket Control Order entered in *Valtrus Innovations Ltd. v. SAP Am. Inc.*, No. 2:24-cv-21, ECF 65 (E.D. Tex. Jan. 15, 2024)
1010	SAP America, Inc. and SAP SE's Motion to Dismiss for Lack of Standing Pursuant to Rule 12(b)(1) and Rule 12(b)(6)
1011	SAP America, Inc. and SAP SE's Motion to Reconsider Partial Denial of SAP's Motion to Dismiss and Grant of Valtrus's Motion for Leave to Amend Complaint (ECF 83)
1012	Valtrus and KPI's Complaint for Patent Infringement and Jury Demand, filed in *Valtrus Innovations Ltd. v. SAP Am, Inc.*, No. 2:24-cv-533, ECF 1 (E.D. Tex. July 12, 2024)
1013	Valtrus and KPI's Statement Regarding *Valtrus II* (Case No. 2:24-CV-533-JRG), filed in *Valtrus Innovations Ltd. v. SAP Am, Inc.*, No. 2:24-cv-21, ECF 85 (E.D. Tex. Nov. 15, 2024)
1014	John L. Hennessy and David A. Patterson, COMPUTER

No.	Description
	ARCHITECTURE: A QUANTITATIVE APPROACH (5th ed. 2012)
1015	Bruce Jacob, Spencer W. Ng, and David T. Wang, MEMORY SYSTEMS: CACHE, DRAM, DISK (2008)
1016	Daniel J. Sorin, Mark D. Hill, David A. Wood, A PRIMER ON MEMORY CONSISTENCY AND CACHE COHERENCY (2011)
1017	Kunle Olukotun, et al., The Case for a Single-Chip Multiprocessor, STANFORD UNIVERSITY: COMPUTER SYSTEMS LABORATORY (1996)
1018	Lance Hammond, Basem A. Nayfeh, and Kunle Olukotun, A Single-Chip Multiprocessor, STANFORD UNIVERSITY (Sept. 1997)
1019	Alan Jay Smith, Cache Memories,14 COMPUTING SURVEYS 3 (Sept. 1982)
1020	Thomas Plum, RELIABLE DATA STRUCTURES IN C (1985)
1021	SAP'S STIPULATION REGARDING INVALIDITY ASSERTIONS IN PARALLEL PROCEEDING

Dated: May 6, 2025

Respectfully submitted,

/ Louis L. Campbell /

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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:

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

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