

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAP AMERICA, INC.,
Petitioner

v.

VALTRUS INNOVATIONS LTD.,
Patent Owner

Case No. IPR2025-00419
Patent No. 7,936,738

PATENT OWNER'S UPDATED EXHIBIT LIST

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No.	Exhibit Description
2001	Memorandum for Interim Processes for PTAB Workload Management, dated March 26, 2025
2002	Memorandum on Guidance on USPTO’s recission of “Interim Procedure for Discretionary Denials in AIA Post-Grant Proceedings with Parallel District Court Litigation,” dated March 24, 2025
2003	Order Denying Motion to Stay in <i>Netlist, Inc. v. Samsung Elecs. Co., Ltd.</i> , No. 2:22-cv-293, Dkt. No. 689 (E.D. Tex. Mar. 11, 2024) (Gilstrap, J.)
2004	Executed Summons in <i>Valtrus Innovations Ltd. v. SAP America, Inc. et al.</i> , No. 2:24-cv-00021-JRG, Dkt. No. 10 (E.D. Tex.), served January 17, 2024
2005	Statistics from DocketNavigator for patent cases before Judge Gilstrap of the Eastern District of Texas, for cases filed between January 1, 2020 to March 31, 2025
2006	Federal Court Management Statistics—Profiles, Comparison of Districts Within Circuits, for 12-Month Period Ending December 31, 2024, available at https://www.uscourts.gov/data-table-report-names/federal-court-management-statistics
2007	Notice of Compliance with Service of Patent Owner’s Infringement Contentions in <i>Valtrus Innovations Ltd. v. SAP America, Inc. et al.</i> , No. 2:24-cv-00021-JRG, Dkt. No. 10 (E.D. Tex.), confirming service of infringement contentions on March 11, 2024
2008	Memorandum and Order regarding motion to dismiss, in <i>Valtrus Innovations Ltd. v. SAP America, Inc.</i> , No. 2:24-cv-00021-JRG, Dkt. No. 10 (E.D. Tex. Nov. 8, 2024) (public version)
2009	Seventh Amended Docket Control Order in <i>Koninklijke KPN N.V. v. Telefonaktiebolaget LM Ericsson</i> , No. 2:21-cv-00113-JRG, Dkt. No. 203 (E.D. Tex.)
2010	Order denying stay in <i>Cardware Inc. v. Samsung Elecs. Co., Ltd.</i> , No. 2:22-cv-00141-JRG, Dkt. No. 64 (E.D. Tex. Feb. 16, 2023)
2011	Complaint in <i>Valtrus Innovations Ltd. v. SAP America, Inc.</i> , No. 2:24-cv-00021-JRG (E.D. Tex Jan. 15, 2024)
2012	Petitioner’s email concerning prior art narrowing, dated May 1, 2025

No.	Exhibit Description
2013	Order consolidating <i>Valtrus Innovations Ltd. v. SAP America, Inc.</i> , No. 2:24-cv-00533-JRG (E.D. Tex.) and <i>Valtrus Innovations Ltd. v. SAP America, Inc.</i> , No. 2:24-cv-00021-JRG (E.D. Tex), dated Feb. 24, 2025
2014	Patent Owner’s email concerning claim narrowing, dated April 10, 2025
2015	Third Amended Docket Control Order in <i>Valtrus Innovations Ltd. v. SAP America, Inc.</i> , No. 2:24-cv-00021-JRG, Dkt. No. 141 (E.D. Tex. Apr. 20, 2025)
2016	Opening Brief in Support of Motion to Dismiss for Lack of Subject-Matter Jurisdiction, Under the First-to-File Rule, Lack of Personal Jurisdiction, and for Failure to State a Claim in <i>SAP Am. Inc. v. Valtrus Innovations, Ltd.</i> , No. 24-cv-756-GBW, Dkt. 14 (D. Del.)
2017	Reply in Support of Motion to Dismiss for Lack of Subject-Matter Jurisdiction, Under the First-to-File Rule, Lack of Personal Jurisdiction, and for Failure to State a Claim in <i>SAP Am. Inc. v. Valtrus Innovations, Ltd.</i> , No. 24-cv-756-GBW, Dkt. 32 (D. Del.)
2018	Excerpt from Petitioner’s Invalidity Contentions, served May 20, 2024, in <i>Valtrus Innovations Ltd. v. SAP America, Inc. et al.</i> , No. 2:24-cv-00021-JRG (E.D. Tex.)
2019	[Proposed] Fourth Amended Docket Control Order in <i>Valtrus Innovations Ltd. v. SAP America, Inc.</i> , No. 2:24-cv-00021-JRG, Dkt. No. 147-1 (E.D. Tex. filed Apr. 30, 2025)
2020	European Patent Application EP 1 501 257 A1
2021	FlowCharts for Section 35 U.S.C. §102(e) Dates, Version 1.0 (Nov. 2002), available at https://www.uspto.gov/sites/default/files/web/offices/dcom/olia/aipa/102eflowchart.pdf

Dated: June 10, 2025

Respectfully submitted,

/Patrick Colsher/

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing PATENT OWNER'S UPDATED EXHIBIT LIST and Exhibits 2020 and 2021, were served on June 10, 2025, via electronic mail upon counsel of record for Petitioner at the following email addresses:

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