

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZHUHAI COSMX BATTERY CO., LTD.,
Petitioner

v.

NINGDE AMPEREX TECHNOLOGY LTD.,
Patent Owner

Case No. IPR2025-00431
U.S. Patent No. 11,799,131

PATENT OWNER'S UPDATED EXHIBIT LIST

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Patent Trial and Appeal Board
US Patent and Trademark Office
PO Box 1450
Alexandria, Virginia 22313-1450

Pursuant to 37 C.F.R. § 42.63(e), Patent Owner Ningde Amperex Technology Ltd. (“ATL”) submits a current listing of exhibits. Patent Owner’s Exhibit 2051 (corresponding to a claim construction order issued by the U.S. District Court for the Eastern District of Texas on February 17, 2026) is being filed today. Patent Owner notes that the claim construction order has already been filed as Exhibit 1049, and Patent Owner is filing the claim construction order again in response to the Board’s email of February 25, 2026, granting authorization to file the claim construction order as an exhibit.

LIST OF EXHIBITS

Exhibit Number	Description
2001	Second Amended Complaint, <i>Ningde Amperex Tech. Ltd. v. Zhuhai CosMX Battery Co.</i> , Case No. 2:24-cv-00728-JRG, ECF No. 23 (E.D. Tex. Jan. 28, 2025)
2002	Scheduling Order, <i>Ningde Amperex Tech. Ltd. v. Zhuhai CosMX Battery Co.</i> , Case No. 2:24-cv-00728-JRG, ECF No. 27 (E.D. Tex. Feb. 6, 2025)
2003	CosMX Invalidity Contentions Cover Pleading, <i>Ningde Amperex Tech. Ltd. v. Zhuhai CosMX Battery Co.</i> , Case No. 2:24-cv-00728-JRG (E.D. Tex. Jan. 7, 2025)
2004	Summons to attend oral proceedings in German Case No. 3 Ni 12/23 (EP) (“Germany Order 1”)
2005	Summons to attend oral proceedings in German Case No. 3 Ni 12/24 (EP) (“Germany Order 2”)
2006	Docket Navigator Statistics for Judge Rodney Gilstrap (accessed May 5, 2025)
2007	Docket, <i>Ningde Amperex Tech. Ltd. v. Zhuhai CosMX Battery Co.</i> , Case No. 2:22-cv-00232 (E.D. Tex.)

Exhibit Number	Description
2008	Joint Motion for Entry of Protective Order, <i>Ningde Amperex Tech. Ltd. v. Zhuhai CosMX Battery Co.</i> , No. 2:24-cv-00728-JRG, ECF No. 30 (E.D. Tex. Feb. 11, 2025)
2009	Amended Final Judgment, <i>Ningde Amperex Tech. Ltd. v. Zhuhai CosMX Battery Co.</i> , Case No. 2:22-cv-00232, ECF No. 427 (E.D. Tex.)
2010	Article, <i>Lithium battery manufacturer ATL won injunction against its Chinese rival COSMX in German Court</i> , China IP Today (April 6, 2024)
2011	General Docket, <i>Ningde Amperex Tech. Ltd. v. Zhuhai CosMX Battery Co.</i> , No. 25-1037 (CAFC)
2012	U.S. Patent No. 10,833,363 (“the ’363 Patent”)
2013	Darts IP Reports: CN109301326, CN104466097, CN206490141, CN108352492 (May 6, 2025)
2014	Dec. 20, 2021 memo titled “New PE2E Search Tool Using AI Search Features” by Acting Deputy Director Andrew Hirshfeld
2015	Declaration of Dean R. Wheeler, Ph.D.
2016	<i>Curriculum Vitae</i> of Dean R. Wheeler, Ph.D.
2017	Sigma-Aldrich Safety Data Sheet, “Lithium hexafluorophosphate solution in ethylene carbonate-d ₄ (99 atom % D) and ethyl-d ₅ methyl-d ₃ carbonate (98 atom % D), 1.0 M LiPF ₆ in EC-d ₄ /EMC-d ₈ =3:7 (v/v), battery grade”, dated July 11, 2016
2018	Safety Data Sheet, “Lithium Hexafluorophosphate in EC/EMC 3:7”, dated September 2018
2019	Sigma-Aldrich Product Specification, “Lithium hexafluorophosphate solution - in ethylene carbonate and diethyl carbonate, 1.0M LiPF ₆ in EC/DEC=50/50 (v/v), battery grade”
2020	Sigma-Aldrich Product Specification, “Lithium hexafluorophosphate solution - in diethyl carbonate, 1.0M LiPF ₆ in DEC, battery grade”
2021	Sigma-Aldrich Product Specification, “Lithium hexafluorophosphate solution - in ethylene carbonate and dimethyl carbonate, 1.0M LiPF ₆ in EC/DMC=50/50 (v/v), battery grade”
2022	Chinese Patent Application No. CN104051787A to Yongjun et al. (including English translation, translation affidavit, and copy of original document in Chinese)

Exhibit Number	Description
2023	Wenbo Zhang et al., <i>Interfacial processes and influence of composite cathode microstructure controlling the performance of all-solid-state lithium batteries</i> , 9 ACS Applied Materials & Interfaces 17835–17845 (2017)
2024	BYU DIPPR® (Design Institute for Physical Properties) Thermophysical Properties Laboratory Data Information Sheet for n-Propyl Propionate
2025	2016 Batteries Conference GRC, available at: https://www.grc.org/batteries-conference/2016/ (accessed on 12 May 2025)
2026	Hubs – Department of Energy, available at: https://www.energy.gov/hubs (accessed on 12 May 2025)
2027	DOE Energy Innovation Hubs, available at: https://science.osti.gov/bes/Research/DOE-Energy-Innovation-Hubs (accessed on 12 May 2025)
2028	Amir-Sina Hamed, Fezzeh Pouraghajan, Fei Sun, Mojdeh Nikpour, & Dean R. Wheeler, <i>Interplay of Electrode Heterogeneity and Lithium Plating</i> , 169 J. Electrochem. Soc. 020551 (2022)
2029	Fei Sun and Dean R. Wheeler, <i>The Effects of Lithium Ions and pH on the Function of Polyacrylic Acid Binder for Silicon Anodes</i> , 170 J. Electrochem. Soc. 080502 (2023)
2030	Fezzeh Pouraghajan, Andrea I. Thompson, Emilee E. Hunter, Brian Mazzeo, Jake Christensen, Ram Subbaraman, Michael Wray, & Dean Wheeler, <i>The Effects of Cycling on Ionic and Electronic Conductivities of Li-ion Battery Electrodes</i> , 492 J. of Power Sources 229636 (2021)
2031	Amir-Sina Hamed, Edmund M. Shumway, & Dean R. Wheeler, <i>Electrode-Level Modeling of Silicon Anodes for Improved Cell Design</i> , 171 J. Electrochem. Soc. 120539 (2024)
2032	Jerome Workman, Jr., <i>A Comprehensive Review of Spectroscopic Techniques for Lithium-Ion Battery Analysis</i> , 39 Spectroscopy 6 (2024), https://doi.org/10.56530/spectroscopy.ii3689u3
2033	Anup Barai et al., <i>A Comparison of Methodologies for the Non-Invasive Characterisation of Commercial Li-Ion Cells</i> , 72 Progress in Energy and Combustion Science 1-31 (2019)

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2034	<i>Lithium-ion Battery Design: Effects of Optimal Compaction Density</i> , available at: https://www.neware.net/news/lithium-ion-battery-design-effects-of-optimal-compaction-density/230/83.html (accessed on May 23, 2025)
2035	Shu Lu, et al., <i>Binder-Free LiCoO₂/Carbon Nanotube Cathodes for High-Performance Lithium Ion Batteries</i> , 24 Adv. Mater. 2294-2298 (2012)
2036	Lei-Lei Lu, et al., <i>Wood-Inspired High-Performance Ultrathick Bulk Battery Electrodes</i> , Adv. Mater. 1706745 (2018)
2037	Yasuhiko Takahashi, et al., <i>Structure and electron density analysis of electrochemically and chemically delithiated LiCoO₂ single crystals</i> , 180 Journal of Solid State Chemistry 313-321 (2007), https://doi.org/10.1016/j.jssc.2006.10.018
2038	<i>Carbon Black</i> , Available at: https://pubchem.ncbi.nlm.nih.gov/compound/carbon%20black , (accessed on May 23, 2025)
2039	Sankar Mandal, et al., <i>The Role of Carbon Black in LiMn₂O₄-Based Composites as Cathodes for Rechargeable Lithium Batteries</i> . 148 J. Electrochem. Soc. A24-A29 (2001)
2040	<i>Ethylene Carbonate</i> , https://www.m-chemical.co.jp/en/products/departments/mcc/c2/product/1200981_7910.html (accessed on June 8, 2025)
2041	<i>Declaration of Brady Cox in Support of Patent Owner's Notice of Intent to Designate Provisionally Recognized PTAB Attorney Under 37 C.F.R. § 42.10(c)(2)</i>
2042	Deposition Transcript of Brett Lucht, Ph.D., dated September 13, 2022, IPR2021-01440
2043	Declaration of Dr. Brett Lucht, dated September 15, 2023, IPR2023-01016
2044	Reserved
2045	Alison L. Michan, et al., <i>Fluoroethylene Carbonate and Vinylene Carbonate Reduction: Understanding Lithium-ion Battery Electrode Additives and Solid Electrolyte Interphase Formation</i> , Chemistry of Materials 2016 28 (22), 8149-8159
2046	Sha Tan, et al., <i>Review on Low-Temperature Electrolytes for Lithium-Ion and Lithium Metal Batteries</i> , Electrochemical Energy Reviews (2023) 6:35, https://doi.org/10.1007/s41918-023-00199-1

Exhibit Number	Description
2047	Supplemental Declaration of Dean R. Wheeler, Ph.D. in support of Patent Owner Response
2048	Lidan Xing et al., <i>Deciphering the Ethylene Carbonate–Propylene Carbonate Mystery in Li-Ion Batteries</i> , 51 Accounts of Chemical Research 282-289 (2018), https://doi.org/10.1021/acs.accounts.7b00474
2049	Academic Press Dictionary of Science and Technology (Christopher Morris ed., 1992)
2050	Deposition Transcript of Brett Lucht, Ph.D., dated October 22, 2025, and executed Errata Sheet IPR2025-00431
2051	Claim Construction Order, <i>Ningde Ampere Tech. Ltd. v. Zhuhai CosMX Battery Co.</i> , Case No. 2:24-cv-00728-JRG, ECF No. 171 (E.D. Tex. Feb. 17, 2026)

Dated: February 26, 2026

Respectfully submitted,

By: /Christopher TL Douglas/
Christopher TL Douglas
Reg. No. 56,950

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §42.6(e), the undersigned hereby certifies that true and correct copies of the foregoing **PATENT OWNER'S EXHIBIT LIST and NINGDE AMPEREX TECH. EXHIBIT 2051** were served in their entirety on February 26, 2026 , via filing through the Patent Trial and Appeal Case Tracking System (P-TACTS), as well as by a delivering copy via electronic mail to the following:

James D. Stein
james.stein@leehayes.com

Kevin Yao
kevin.yao@leehayes.com

Steven Philbin
steven.philbin@leehayes.com

Jason D. Eisenberg
jasone-PTAB@sternekessler.com

Jason Fitzsimmons
jfitzsimmons-PTAB@sternekessler.com

Service email
COSMX-PTAB@leehayes.com

Service email
PTAB@sternekessler.com

Dated: February 26, 2026

By: /Christopher TL Douglas/
Christopher TL Douglas