

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner,

v.

BRODTI INC.,
Patent Owner.

Case IPR2025-00472
Patent 11,416,898 B2

PETITIONER'S UPDATED EXHIBIT LIST

Exhibit No.	Description of Document
1001	U.S. Patent No. 11,416,898 B2 to John E. DeTitta (filed May 24, 2019, issued August 16, 2022) (“ 898 ” or “ 898 patent ”)
1002	Declaration of Mark Crovella, Ph.D. (“ Crovella ”)
1003	U.S. Patent Application Pub. No. 2004/0054589 A1 to Frank C. Nicholas et al. (filed September 8, 2003, published March 18, 2004) (“ Nicholas ”)
1004	U.S. Patent Application Pub. No. 2004/0128547 A1 to Robert Laidlaw et al. (filed December 31, 2002, published July 1, 2004) (“ Laidlaw ”)
1005	U.S. Patent Application Pub. No. 2001/0039515 A1 to Vijay Mayadas (filed May 2, 2001, published November 8, 2001) (“ Mayadas ”)
1006	U.S. Patent Application Pub. No. 2005/0027594 A1 to Elliot Yasnovsky et al. (filed November 3, 2003, published February 3, 2005) (“ Yasnovsky ”)
1007	U.S. Patent No. 8,156,216 B1 to Brent Error (filed January 10, 2003, issued April 10, 2012) (“ Error ”)
1008	U.S. Patent No. 6,138,142 to Steven J. Linsk (filed December 20, 1996, issued October 24, 2000) (“ Linsk ”)
1009	Excerpts from Robbin Zeff et al., <i>Advertising on the Internet</i> (2d ed. 1999) (“ Zeff ”)
1010	Excerpts from <i>Microsoft Computer Dictionary</i> (5th ed. 2002)
1011	Excerpts from <i>Dictionary of Computer and Internet Terms</i> (8th ed. 2003)
1012	U.S. Provisional Patent Application No. 60/298,329 (incorporated by reference into Nicholas, EX1003)

Exhibit No.	Description of Document
1013	U.S. Provisional Patent Application No. 60/362,297 (incorporated by reference into Nicholas, EX1003)
1014	Excerpts from Bob Baxley, <i>Making the Web Work: Designing Effective Web Applications</i> (2002) (“ Baxley ”)
1015	WO 01/59653 A1 to Neal J. Manowitz (filed January 31, 2001, published August 16, 2001) (“ Manowitz ”)
1016	Excerpts from James F. Korsh, <i>Data Structures, Algorithms, and Program Style</i> (1986) (“ Korsh ”)
1017	Declaration of Ingrid Hsieh-Yee, Ph.D.
1018	Proof of Service of Complaint in <i>BrodTi Inc. v. Google LLC</i> , Case No. 1:24-cv-00173-JCB (D. Del.)
1019	Plaintiff’s Notice of Voluntary Dismissal in <i>BrodTi Inc. v. Google LLC</i> , Case No. 6:24-cv-00058-RP (W.D. Tex.)
1020	’898 Patent Prosecution History
1021	Excerpts from <i>AIPLA 2023 Report of the Economic Survey</i> available at < https://fundamentalpatlit.com/wp-content/uploads/2024/02/AIPLA.pdf >
1022	Docket Sheet in <i>BrodTi Inc. v. Google LLC</i> , Case No. 1:24-cv-00173-JCB (D. Del.)
1023	Table C-5—U.S. District Courts—Civil Statistical Tables For The Federal Judiciary (December 31, 2024) available at < https://www.uscourts.gov/data-news/data-tables/2024/12/31/statistical-tables-federal-judiciary/c-5 >
1024	Declaration of Mark R. Weinstein ISO Petitioner’s Notice of Intent to Designate a Provisionally Recognized PTAB Attorney as Backup Counsel

Exhibit No.	Description of Document
1025	Declaration of Reuben Chen ISO Petitioner's Notice of Intent to Designate a Provisionally Recognized PTAB Attorney as Backup Counsel
1026	Reply Declaration of Mark Crovella, Ph.D. ISO Petition for <i>Inter Partes</i> Review
1027	Transcript of January 22, 2026 deposition of Harley Myler, Ph.D., P.E.
1028	Excerpts from Webster's New World Computer Dictionary (10 th ed. 2003)
1029	Petitioner's Demonstrative Exhibit

Dated: April 17, 2026

Respectfully submitted,

COOLEY LLP
ATTN: Patent Group
1299 Pennsylvania Avenue NW
Suite 700
Washington, DC 20004
Tel: (650) 843-5001
Fax: (650) 849-7400

By: / Heidi L. Keefe /
Heidi L. Keefe
Reg. No. 40,673
Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify, pursuant to 37 C.F.R. § 42.6(e), that a complete copy of the attached **PETITIONER'S UPDATED EXHIBIT LIST** was served on April 17, 2026, upon the parties via electronic mail as follows:

TCremen@sheppardmullin.com

JGatto@sheppardmullin.com

LegalTm-BrodTi-PTAB@sheppardmullin.com

Dated: April 17, 2026

/ Heidi L. Keefe /

Heidi L. Keefe

Reg. No. 40,673

COOLEY LLP

1299 Pennsylvania Ave. NW,
Suite 700

Washington, D.C. 20004

Tel: (650) 843-5001