

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,

Petitioner,

v.

BRODTI INC.,

Patent Owner.

Case No. IPR2025-00472

U.S. Patent No. 11,416,898

PATENT OWNER'S UPDATED EXHIBIT LIST

No.	Description
1001	U.S. Patent No. 11,416,898 B2 to John E. DeTitta (filed May 24, 2019, issued Aug. 16, 2022) (“898” or “898 patent”)
1002	Declaration Of Mark Crovella, PH.D.
1003	U.S. Patent Application Pub. No. 2004/0054589 A1 to Frank C. Nicholas et al. (filed September 8, 2003, published March 18, 2004) (“ <i>Nicholas</i> ”)
1004	U.S. Patent Application Pub. No. 2004/0128547 A1 to Robert Laidlaw et al. (filed December 31, 2002, published July 1, 2004) (“ <i>Laidlaw</i> ”)
1005	U.S. Patent Application Pub. No. 2001/0039515 A1 to Vijay Mayadas (filed May 2, 2001, published November 8, 2001) (“ <i>Mayadas</i> ”)
1006	U.S. Patent Application Pub. No. 2005/0027594 A1 to Elliot Yasnovsky et al. (filed November 3, 2003, published February 3, 2005) (“ <i>Yasnovsky</i> ”)
1007	U.S. Patent No. 8,156,216 B1 to Brent Error (filed January 10, 2003, issued April 10, 2012) (“ <i>Error</i> ”)
1008	U.S. Patent No. 6,138,142 to Steven J. Linsk (filed December 20, 1996, issued October 24, 2000) (“ <i>Linsk</i> ”)
1009	Excerpts from Robbin Zeff et al., Advertising on the Internet (2d ed. 1999)
1010	Excerpts from Microsoft Computer Dictionary (5th ed. 2002)
1011	Excerpts from Dictionary of Computer and Internet Terms (8th ed. 2003)
1012	U.S. Provisional Patent Application No. 60/298,329
1013	U.S. Provisional Patent Application No. 60/362,297
1014	Excerpts from Bob Baxley, Making the Web Work: Designing Effective Web Applications (2002) (“ <i>Baxley</i> ”)
1015	WO 01/59653 A1 to Neal J. Manowitz (filed January 31, 2001, published August 16, 2001) (“ <i>Manowitz</i> ”)
1016	Excerpts from James F. Korsh, <i>Data Structures, Algorithms, and Program Style</i> (1986) (“ <i>Korsh</i> ”)

No.	Description
1017	Declaration of Ingrid Hsieh-Yee, Ph.D.
1018	Proof of Service of Complaint in BrodTi Inc. v. Google LLC, Case No. 1:24-cv-00173-JCB (D. Del.)
1019	Plaintiff's Notice of Voluntary Dismissal in BrodTi Inc. v. Google LLC, Case No. 6:24-cv-00058-RP (W.D. Tex.)
1020	'898 Patent Prosecution History
1021	Excerpts from AIPLA 2023 Report of the Economic Survey available at < https://fundamentalpatlit.com/wpcontent/uploads/2024/02/AIPLA.pdf >
1022	Docket Sheet in BrodTi Inc. v. Google LLC, 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/datatables/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
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 Inter Partes Review
1027	Transcript of January 22, 2026 deposition of Harley Myler, Ph.D., P.E.
1028	Excerpts from Webster's New World Computer Dictionary (10th ed. 2003)
2002	Prosecution History for the '898 Patent (U.S. Application No. 16/422,106) (Pros. His.)

No.	Description
2003	Prosecution History for the '290 Patent (U.S. Application No. 14/015,604) ('290 Patent Pros. His.)
2004	October 24, 2025 Deposition Transcript of Dr. Mark Crovella, Ph.D.
2005	Plaintiff's Response To Defendant's Motion To Dismiss in BrodTl Inc., v. Google LLC, C.A. No. 24-173-JCB (D. Del.).
2006	Printout of www.youtube.com as it appeared on April 30, 2007 from the Internet Archive.
2007	Dictionary Definitions of "option," "predetermined," and "select" from The New Oxford American Dictionary by the Oxford University Press, 2001
2008	Dictionary Definitions of "option," "predetermined," and "select" from Webster's Third New International Dictionary, Merriam-Webster, Inc., 2002
2009	Declaration of Harley Myler, Ph.D, P.E.
2010	Declaration of Timothy Cremen
2011	Patent Owner's Demonstrative Exhibits

Date: April 17, 2026

Respectfully submitted,

SHEPPARD, MULLIN,
RICHTER & HAMPTON LLP

By: /Timothy P. Cremen/

Timothy P. Cremen (Reg. No. 50,855)

James Gatto (Reg. No. 32,694)

2099 Pennsylvania Avenue, N.W.

Suite 100

Washington, DC 20006-6801

Telephone: 202.747.1900

Facsimile: 202.747.1901

Email: TCremen@sheppardmullin.com

Email: JGatto@sheppardmullin.com

Attorneys for Patent Owner

BrodTi Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 17, 2026, a true and correct copy of the **PATENT OWNER'S UPDATED EXHIBIT** was served via email to all parties to the following counsel of record for the Petitioner:

Heidi L. Keefe (hkeefe@cooley.com)

Andrew C. Mace (amace@cooley.com)

Mark R. Weinstein (mweinstein@cooley.com)

Reuben Chen (rchen@cooley.com)

Date: April 17, 2026

SHEPPARD, MULLIN,
RICHTER & HAMPTON LLP

By: /Timothy P. Cremen/

Timothy P. Cremen

Reg. No. 50,855

*Attorneys for Patent Owner
BrodTi Inc.*