

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD., AND
SAMSUNG ELECTRONICS AMERICA, INC.,

Petitioners,

v.

KEYLESS LICENSING LLC,

Patent Owner.

Case No. IPR2025-00526
U.S. Patent No. 9,304,602

PETITIONERS' UPDATED EXHIBIT LIST

Pursuant to 37 C.F.R. § 42.63(e), Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. hereby submit a current listing of Petitioner exhibits. Exhibits 1079-1089 are being filed today.

Exhibit	Description
1001	U.S. Patent No. 9,304,602 to Ghassabian (“the ’602 patent”)
1002	Excerpts from File History for U.S. Patent No. 9,304,602
1003	Declaration of Dr. Benjamin Bederson, Ph.D. (“Bederson”)
1004	Curriculum Vitae of Dr. Benjamin Bederson, Ph.D.
1005	U.S. Patent Application Publication No. 2009/0249247 A1 to Tseng et al. (“ <i>Tseng</i> ”)
1006	U.S. Patent Application Publication No. 2010/0302172 A1 to Wilairat (“ <i>Wilairat</i> ”)
1007	Japanese Published Unexamined Patent Application No. 2003-195998 to Hisatomi (“ <i>Hisatomi</i> ”)
1008	Certified Translation of Japanese Published Unexamined Patent Application No. 2003-195998 to Hisatomi (“ <i>Hisatomi</i> ”)
1009	RESERVED
1010	U.S. Patent Application Publication No. 2009/0094562 A1 to Jeong et al. (“ <i>Jeong</i> ”)
1011	U.S. Patent Application Publication No. 2010/0050076 A1 to Roth (“ <i>Roth</i> ”)
1012	Volker Roth & Thea Turner, <i>Bezel Swipe: Conflict-Free Scrolling and Multiple Selection on Mobile Touch Screen Devices</i> , CHI 2009 ~ Multimodal Mobile Interaction, pp. 1523-26 (ACM 2009) (“ <i>Bezel Swipe</i> ”)

Exhibit	Description
1013	U.S. Patent Application Publication No. 2011/0209099 A1 to Hinckley et al. (“ <i>Hinckley</i> ”)
1014	U.S. Patent Application Publication No. 2004/0109013 A1 to Goertz (“ <i>Goertz</i> ”)
1015	U.S. Patent Application Publication No. 2006/0209040 A1 to Garside et al. (“ <i>Garside</i> ”)
1016	U.S. Patent Application No. 2010/0105443 A1 to Vaisanen (“ <i>Vaisanen</i> ”)
1017	Reserved
1018	T-Mobile G1 User Manual (2009) (“ <i>T-Mobile G1 User Manual</i> ”)
1019	Samsung Galaxy User Manual (Samsung 2009) (“ <i>Samsung GT-i7500 User Manual</i> ”)
1020	User Guide palm pre plus (Palm Inc. 2009) (“ <i>Palm Pre Plus User Guide</i> ”)
1021	Edward C. Baig, <i>Palm Pre The Missing Manual</i> (O’Reilly Media Inc., 1st ed. Aug. 2009) (“ <i>Palm Pre The Missing Manual</i> ”)
1022	Neonode N2 user guide (Neonode AB 2007) (“ <i>Neonode N2 User Guide</i> ”)
1023	Excerpt from Barron’s <i>Dictionary of Computer and Internet Terms</i> (Barron’s Educational Series, Inc., 10th ed. 2009) (“window”)
1024	Excerpt from <i>Microsoft Computer Dictionary</i> (Microsoft Press, 5th ed. 2002) (“window”)
1025	Excerpts from Jef Raskin, <i>The Humane Interface: New Directions for Designing Interactive Systems</i> (ACM Press, A Division of the Association for Computing Machinery (ACM) 2000)
1026	IBM Simon Users Manual (IBM Corp. 1994)

Exhibit	Description
1027	Johnny Accot & Shumin Zhai, <i>More than dotting the i's — Foundations for crossing-based interfaces</i> , CHI 2002, Vol. 4, Issue 1, pp. 73-80 (ACM 2002) (“ <i>Crossing-based Interfaces</i> ”)
1028	Georg Apitz & François Guimbretière, <i>CrossY: A Crossing-Based Drawing Application</i> , UIST '04, Vol. 6, Issue 2, pp. 3-12 (ACM 2004) (“ <i>CrossY</i> ”)
1029	Apple Newton MessagePad Handbook (Apple Computer, Inc., 1995)
1030	Apple Newton 2.0 User Interface Guidelines (Apple Press 1996)
1031	Plaintiff's Infringement Contentions in <i>Keyless Licensing LLC v. Samsung Electronics America, Inc.</i> , No. 2:24-cv-00464-JRG (Oct. 9, 2024)
1032-1078	RESERVED
1079	Kevin Ohannessian, <i>This Smartwatch Keyboard Is The Second Coming Of T9</i> , Fast Company (June 2, 2015), https://www.fastcompany.com/3046742/this-smartwatch-keyboard-is-the-second-coming-of-t9
1080	<i>Snapkeys, LTD v. Google LLC</i> , Case No. 5:2019-cv-02658, ECF No. 120 (N.D. Cal. 2021).
1081	Prosecution History Excerpt U.S. Patent Application No. 16/516,892
1082	Defendants' Answer to the Complaint in <i>Keyless Licensing LLC v. Samsung Electronics America, Inc.</i> , No. 2:24-cv-00464-JRG, ECF No. 37 (E.D. Tex. Oct. 10, 2024)
1083	Eastern District of Texas Calendar Events Set For 4/20/2026 (Printed July 2, 2025)
1084	Jennifer Nall, <i>How delayed Notice of Date Accorded mailings may affect inter partes review</i> , Intellectual Property News, DLA Piper (June 3, 2025) https://www.dlapiper.com/en/insights/publications/intellectual-property-news/2025/how-delayed-notice-of-date-accorded-mailings-may-affect-inter-partes-review

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1085	George Quillin, <i>PTAB Average Time-to-Decision in IPRs May Surprise You, JD Supra</i> , (July 28, 2015) https://www.jdsupra.com/legalnews/ptab-average-time-to-decision-in-iprs-71645/
1086	Plaintiff Keyless Licensing P.R. 4-1 Disclosures (June 13, 2025)
1087	Aruni Soni, <i>Chief Patent Board Judge Waves Off Workforce Attrition Concerns</i> , BloombergLaw – IP Law News, (May 7, 2025), https://news.bloomberglaw.com/ip-law/chief-patent-board-judge-waves-off-workforce-attrition-concerns
1088	Patent Trial and Appeal Board, <i>Appeal Statistics: May 2025</i> , USPTO (May 31, 2025), https://www.uspto.gov/sites/default/files/documents/appeal_stats_may2025.pdf
1089	Patent Trial and Appeal Board, <i>Appeal and Interference Statistics: May 2017</i> , USPTO (May 2017), https://www.uspto.gov/sites/default/files/documents/Appeal%20and%20Interference%20Statistics%20-%20May%202017.pdf

Respectfully submitted,

Dated: July 9, 2025

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Petitioners' Updated Exhibit List and Exhibits 1079-1089** were served on July 9, 2025, via e-mail directed to counsel of record for the Patent Owner at the following:

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