

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SHENZHEN ROOT TECHNOLOGY CO., LTD.,
Petitioner,

v.

CHIARO TECHNOLOGY LTD.,
Patent Owner.

Case IPR2025-00554
Patent 11,806,454

PETITIONER'S UPDATED EXHIBIT LIST

EXHIBITS

EX1001	U.S. Patent No. 11,806,454 to De Becdelievre et al. (“the ’454 Patent”)
EX1002	Excerpts from the Prosecution History of the ’454 Patent (“the ’454 Prosecution History”)
EX1003	Declaration and Curriculum Vitae of Ryan Bauer
EX1004	U.S. Patent No. 10,149,929 to Furrer et al. (“Furrer”)
EX1005	U.S. Patent Application Pub. No. 2015/0283311 to Alvarez et al. (“Alvarez”)
EX1006	U.S. Patent Application Pub. No. 2015/0217035 to Pollen et al. (“Pollen”)
EX1007	U.S. Patent Application Pub. No. 2004/0087898 to Weniger (“Weniger”)
EX1008	U.S. Patent Application Pub. No. 2018/0021491 to Rigert et al. (“Rigert”)
EX1009	PCT Application Pub. No. WO2016/186452 to Park
EX1010	Certified English translation of PCT Application Pub. No. WO2016/186452 to Park (“Park”)
EX1011	U.S. Patent Application Pub. No. 2011/0071466 to Silver et al. (“Silver”)
EX1012	U.S. Patent No. 7,677,423 to Kasting et al. (“Kasting”)
EX1013	U.S. Patent No. 8,187,227 to Luzbetak et al. (“Luzbetak”)
EX1014	U.S. Patent No. 10,046,097 to Thompson et al. (“Thompson”)
EX1015	U.S. Patent Application Pub. No. 2018/0333523 to Chang et al. (“Chang”)

EX1016	Docket of <i>Shenzhen Root Technology Co., Ltd., v. Chiaro Technology, Ltd.</i> , Case No. 2:23-cv-631-KKE (W.D. Wash.), as of August 13, 2024
EX1017	Order on Motion to Continue Pretrial Deadlines and Strike Trial Date, <i>Shenzhen Root Technology Co., Ltd., v. Chiaro Technology, Ltd.</i> , Case No. 2:23-cv-631 (W.D. Wash.), issued June 28, 2024
EX1018	Momcozy's Motion to Continue Pre-Trial Deadlines and Strike Trial Date, <i>Shenzhen Root Technology Co., Ltd., v. Chiaro Technology, Ltd.</i> , Case No. 2:23-cv-631 (W.D. Wash.), issued June 4, 2024
EX1019	U.S. Patent No. 6,379,327 to Lundy ("Lundy")
EX1020	PCT Application Pub. No. WO2002/102437 to Myers et al.
EX1021	PTC Application Pub. No. WO2008/137678 to Myers et al.
EX1022	U.S. Patent Application Pub. No. 2016/0082166 to Guthrie et al.
EX1023	May 14, 2025 <i>Sotera</i> Stipulation

Respectfully submitted,

Dated May 14, 2025

/Michael T. Hawkins/
Michael T. Hawkins, Reg. No. 57,867
Patrick J. Bisenius, Reg. No. 63,893
Craig A. Deutsch, Reg. No. 69,264
Terry Stalford, Reg. No. 39,522
Yong Peng Reg. No. 76,048
Ryan Chowdhury Reg. No. 74,466
Fish & Richardson P.C.
60 South Sixth Street, Suite 3200
Minneapolis, MN 55402
T: 202-783-5070
F: 877-769-7945

Attorneys for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 CFR §§ 42.6(e)(1) and 42.6(e)(4)(iii), the undersigned certifies that on May 14, 2025, a complete and entire copy of this Petitioner's Updated Exhibit List and the associated *Sotera* Stipulation are provided via email to the Patent Owner via electronic mail on Patent Owner's lead and backup counsel listed below at the following email addresses:

Heath J. Briggs
Trenton Ward
Benjamin P. Gilford
Elana Araj
Declan Stone-Murphy
Emma Cohen (Pro Hac Vice forthcoming)
Greenberg Traurig, LLP
BriggsH@gtlaw.com
Trenton.Ward@gtlaw.com
gilfordb@gtlaw.com
Elana.Araj@gtlaw.com
Declan.StoneMurphy@gtlaw.com
emma.cohen@gtlaw.com
Willow-IPRs@gtlaw.com

/Li Feng/

Li Feng
Fish & Richardson P.C.
60 South Sixth Street, Suite 3200
Minneapolis, MN 55402
lfeng@fr.com