

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 IPR2025-00560
Patent 11,813,381

PETITIONER'S UPDATED EXHIBIT LIST

EXHIBITS

Exhibit	Reference
1001	U.S. Patent No. 11,813,381 to Jonathan O'Toole et al. ("the '381 patent")
1002	File History of Application 17/203,292 ("the File History")
1003	Declaration of Ryan Bauer in Support of Petition
1004	File History of Application No. 16/009,547
1005	File History of Application No. 17/181,057 (as of October 2, 2024)
1006	Curriculum Vitae of Ryan Bauer
1007	U.S. Patent Application Publication No. 2018/0333523 ("Chang")
1008	CN Utility Model CN205913571U ("Fang CN")
1009	Certified English Translation of CN Utility Model CN205913571U ("Fang")
1010	U.S. Patent Application Publication No. 2013/0023821 ("Khalil")
1011	U.S. Patent No. 7,641,629 ("Yuen629")
1012	PCT Publication No. WO 2016/186452 ("Park KR")
1013	Certified English Translation of PCT Publication No. WO 2016/186452 ("Park")
1014	U.S. Patent Application Publication No. 2016/0206794 ("Makower794")
1015	U.S. Patent No. 10,483,002 ("Guthrie002")
1016	U.S. Patent Application Publication No. 2016/0271305 ("Kurihara")

Exhibit	Reference
1017-1030	RESERVED
1031	AU Patent Application Publication No. 2010300058 (“Weber”)
1032	U.S. Patent Application Publication No. 2017/0080135 (“Chen”)
1033	U.S. Application Publication No. 2015/0217033 (“Pollen”)
1034	U.S. Application Publication No. 2012/0116299 (“Tack”)
1035	U.S. Patent Application Publication No. 2016/0082166 (“Guthrie166”)
1036	U.S. Application Publication No. 2015/0157775 (“Hu”)
1037	PCT Publication No. WO 2002/102437 (“Myers437”)
1038	PCT Publication No. WO 2008/137678 (“Myers678”)
1039	U.S. Patent Application Publication No. 2007/0219486 (“Myers486”)
1040	U.S. Patent Application Publication No. 2009/0281485 (“Baker”)
1041-1050	RESERVED
1051	Declaratory Judgment Complaint, <i>Shenzhen Root Technology Co., Ltd., v. Chiaro Technology, Ltd.</i> , Case No. 23-cv-00631 (W.D. Wash.), filed 4/28/2023
1052	Chiaro Technology Ltd.’s Answer, Defenses, and Counterclaims to Plaintiff’s Amended Complaint, <i>Shenzhen Root Technology Co., Ltd., v. Chiaro Technology, Ltd.</i> , Case No. 23-cv-00631 (W.D. Wash.), filed 8/14/2023
1053	Chiaro Technology Ltd.’s Amended Counterclaims, <i>Shenzhen Root Technology Co., Ltd., v. Chiaro Technology, Ltd.</i> , Case No. 23-cv-

Exhibit	Reference
	00631 (W.D. Wash.), filed 5/1/2024
1054A	Elvie’s Disclosure of Asserted Claims and Initial Infringement Contentions Under Local Patent Rule 120, <i>Shenzhen Root Technology Co., Ltd., v. Chiaro Technology, Ltd.</i> , Case No. 23-cv-00631 (W.D. Wash.), served 6/10/2024
1054B	Elvie’s Disclosure of Asserted Claims and Supplemental Infringement Contentions Under Local Patent Rule 120, <i>Shenzhen Root Technology Co., Ltd., v. Chiaro Technology, Ltd.</i> , Case No. 23-cv-00631 (W.D. Wash.), served 8/1/2024
1054C	Exhibit 15 – U.S. Patent No. 11,813,381 – Infringement Claim Chart for Momcozy S9 Product, <i>Shenzhen Root Technology Co., Ltd., v. Chiaro Technology, Ltd.</i> , Case No. 23-cv-00631 (W.D. Wash.), served 6/10/2024
1055	Order on Motion to Continue Pretrial Deadlines and Strike Trial Date, <i>Shenzhen Root Technology Co., Ltd., v. Chiaro Technology, Ltd.</i> , Case No. 23-cv-00631 (W.D. Wash.), issued 6/28/2024
1056	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. 23-cv-00631 (W.D. Wash.), issued 6/4/2024
1057	Docket of <i>Shenzhen Root Technology Co., Ltd., v. Chiaro Technology, Ltd.</i> , Case No. 23-cv-00631 (W.D. Wash.), as of October 02, 2024
1058	May 14, 2025 <i>Sotera</i> Stipulation

Respectfully submitted,

Dated May 14, 2025

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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:

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