

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.;
SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioner

v.

SECURE COMMUNICATION TECHNOLOGIES, LLC,
Patent Owner.

Case No. IPR2025-01051
Patent No. 11,687,971

PETITIONER'S UPDATED LIST OF EXHIBITS

LIST OF EXHIBITS¹

Ex. No.	Description
Ex-1001	U.S. Patent No. 11,687,971 (“the ’971 Patent)
Ex-1002	Declaration of Dr. Sundeep Rangan
Ex-1003	Curriculum Vitae of Dr. Sundeep Rangan
Ex-1004	Prosecution History of U.S. Patent No. 11,687,971
Ex-1005	JP Patent Publication No. 2005/12973 to Watanabe
Ex-1006	Certified translation of JP Patent Publication No. 2005/12973 to Watanabe (“Watanabe”)
Ex-1007	U.S. Patent Publication No. 2007/0030824 to Ribaudó (“Ribaudó”)
Ex-1008	PCT Patent Publication No. WO2008/132241 to Behrens (“Behrens”)
Ex-1009	PCT Patent Publication No. WO2008/076827 to Krikorian (“Krikorian”)
Ex-1010	U.S. Patent Publication No. 2005/00174975 to Mgrdechian (“Mgrdechian”)
Ex-1011	Declaration of James A. Proctor, Jr.
Ex-1012	INTENTIONALLY LEFT BLANK
Ex-1013	INTENTIONALLY LEFT BLANK
Ex-1014	INTENTIONALLY LEFT BLANK
Ex-1015	INTENTIONALLY LEFT BLANK

¹ Four-digit pin citations that begin with 0 are to the branded numbers added by Samsung in the bottom right corner of the exhibits. All other pin citations are to original page, column, paragraph, or line numbers.

Ex. No.	Description
Ex-1016	INTENTIONALLY LEFT BLANK
Ex-1017	INTENTIONALLY LEFT BLANK
Ex-1018	INTENTIONALLY LEFT BLANK
Ex-1019	INTENTIONALLY LEFT BLANK
Ex-1020	Claim Mapping Table
Ex-1021	Bluetooth Specification v.2.0 + EDR (Nov. 2004) (“Bluetooth Specification v.2.0 + EDR”)
Ex-1022	Telecom Dictionary (2007) (“beacon channel,” “beaconing”)
Ex-1023	Webster’s New World Telecom Dictionary (2008) (“beaconing”)
Ex-1024	Wikipedia, “ <i>Radio beacon</i> ”
Ex-1025	IEEE 802.11 Specification IEEE Standard 802.11, Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) Specifications (June 2007) (“Wi-Fi Specification”)
Ex-1026	IEEE 802.15 Specification IEEE Standard 802.15.1, Part 15.1: Wireless medium access control and physical layer (PHY) specifications for wireless personal area networks (WPANs) (June 2005) (“Bluetooth Specification”)
Ex-1027	US Patent No. 7,000,001 to Lazaridis et al. (“Lazaridis”)
Ex-1028	US Patent Publication No. 2009/0239467 to Gulin et al. (“Gulin”)
Ex-1029	US Patent Publication No. 2004/0248569 to Kondou et al. (“Kondou”)
Ex-1030	US Patent Publication No. 2006/0287813 to Quigley et al. (“Quigley”)
Ex-1031	US Patent Publication No. 2005/0130634 to Godfrey (“Godfrey”)

Ex. No.	Description
Ex-1032	Wayne Jansen et al., Proximity Beacons and Mobile Device Authentication NISTIR 7200 (June 2005) (“Jansen”)
Ex-1033	US Patent Publication No. 2003/0220114 to Langensteiner et al. (“Langensteiner”)
Ex-1034	US Patent Publication No. 2008/0261526 to Suresh (“Suresh”)
Ex-1035	US Patent Publication No. 2009/0059878 to Tamura (“Tamura”)
Ex-1036	US Patent No. 8,411,662 (“Saund”)
Ex-1037	US Patent Publication No. 2008/0045181 to Suzuki (“Suzuki”)
Ex-1038	PCT Patent Publication No. WO2006/028640 to Briancon et al. (“Briancon”)
Ex-1039	Sorte et al., <i>Service publishing to support an efficient network selection in an 802.11 multi-access environment</i> (Jan. 2006) (“Sorte”)
Ex-1040	US Patent No. 6,928,263 to Blake et al. (“Blake”)
Ex-1041	Yeong, J. H., et al., <i>802.11 a MAC layer: firmware/hardware co-design.</i> , FOURTH INTERNATIONAL CONFERENCE ON INFORMATION, COMMUNICATIONS AND SIGNAL PROCESSING, 2003 (“Yeong”)
Ex-1042	Huang, L. et al., <i>Enhancing wireless location privacy using silent period</i> , IEEE WIRELESS COMMUNICATIONS AND NETWORKING CONFERENCE, (Vol. 2, pp. 1187-1192) (Mar. 2005) (“Huang”)
Ex-1043	IEEE 802 Specification IEEE Standard 802: IEEE Standard for Local and Metropolitan Area Networks: Overview and Architecture (Mar. 2002) (“IEEE 802 2002”)
Ex-1044	IEEE 802 Specification IEEE Standard 802.11g, Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) specifications, Amendment 4: Further Higher Data Rate Extension in the 2.4 GHz Band (June 2003) (“IEEE 802.11g”)

Ex. No.	Description
Ex-1045	IEEE 802 Specification IEEE Standard 802.15.4, Part 15.4: Wireless Medium Access Control (MAC) and Physical Layer (PHY) Specifications for Low-Rate Wireless Personal Area Networks (LR-WPANs) (Oct. 2003) (“IEEE 802.15.4”)
Ex-1046	Notice of Samsung Defendants’ Sotera Plus Prior Art Stipulation, <i>Secure Commc’n Techs., LLC v. Samsung Elecs. Co., Ltd. & Samsung Elecs. Am., Inc.</i> , No. 2:24-CV-00484-JRG-RSP (E.D. Tex. 2024), ECF No. 66.

Respectfully submitted,

Dated: July 10, 2025

By: /s/ Benjamin Haber
Benjamin Haber (Reg. No. 67,129)
Counsel for Petitioner

CERTIFICATE OF SERVICE (37 C.F.R. §42.6(e))

The undersigned certifies pursuant to 37 C.F.R. § 42.6(e) that on July 10, 2025, a true and correct copy of the PETITIONER'S UPDATED LIST OF EXHIBIT was served in its entirety by filing these documents through the PTAB P-TACTS System, as well as by email, on the counsel of record for the Patent Owner:

Brent Bumgardner
Christopher G. Granaghan
NELSON BUMGARDNER CONROY P.C.
3131 W. 7th Street, Suite 300
Fort Worth, Texas 76107
Telephone: (817) 377-9111
Email: brent@nelbum.com
Email: chris@nelbum.com

Charles Austin Ginnings
Timothy E. Grochocinski
Taryn N. Trusty
NELSON BUMGARDNER CONROY P.C.
745 McClintock Drive, Suite 340
Burr Ridge, Illinois 60527
Telephone: (708) 675-1975
Email: austin@nelbum.com
Email: tim@nelbum.com
Email: taryn@nelbum.com

Dated: July 10, 2025

Respectfully submitted,

/s/ Benjamin Haber

Benjamin Haber (Reg. No. 67,129)

O'Melveny & Myers LLP

400 South Hope Street, 19th Floor

Los Angeles, CA 90071

Telephone: (213) 430-6000

Fax: (213) 430-6407

E-Mail: bhaber@omm.com

Attorney for Petitioner