UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NIANTIC, INC.,

Petitioner,

v.

IMAGINEAR, INC.,

Patent Owner.

IPR2025-01276

U.S. Patent No. 12,070,691

PETITIONER'S UPDATED EXHIBIT LIST

Pursuant to 37 C.F.R. § 42.63(e), Petitioner Niantic, Inc. hereby submits a current listing of Petitioner's exhibits. Exhibit 1070 is being filed today.

EXHIBIT LIST

No.	Exhibit
1001	U.S. Patent No. 10,946,284 ("'284Pat")
1002	U.S. Patent No. 11,484,797 ("'797Pat")
1003	U.S. Patent No. 11,666,827 ("'827Pat")
1004	U.S. Patent No. 12,070,691 ("'691Pat")
1005	Complaint, *ImagineAR, Inc. and Imagine AR, Inc. v. Niantic, Inc.*, 1-24-cv-01252 (D. Del.)
1006	Declaration of Stacy Friedman ("Friedman")
1007	Curriculum Vitae of Stacy Friedman
1008	File History of U.S. Patent Application No. 14/084,113 ("'113App")
1009	File History of U.S. Patent No. 10,946,284 ("'284FH")
1010	File History of U.S. Patent No. 11,484,797 ("'797FH")
1011	File History of U.S. Patent No.11,666,827 ("'827FH")
1012	File History of U.S. Patent No. 12,070,691 ("'691FH")
1013	U.S. Patent Application Publication No. 2012/0244945 ("Kolo")
1014	U.S. Patent Application Publication No. 2011/0214071 ("Zyda")
1015	Computer Dictionary, Microsoft Press (1st ed., 1991)
1016	Wikipedia, the free encyclopedia, Role-Playing Game, at https://web.archive.org/web/20100220021543/http://en.wikipedia.org/wiki/Role-playing_game (last visited Jun. 18, 2025)
1017	Wikipedia, the free encyclopedia, Role-playing game (pen and paper), at https://web.archive.org/web/20100111053448/ http://en.wikipedia.org/wiki/Role-playing_game_(pen_and_paper) (last visited Jun. 18, 2025)

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1018	Wikipedia, the free encyclopedia, Tabletop role-playing game, at https://web.archive.org/web/20111025135658/ http://en.wikipedia.org/wiki/Tabletop_role-playing_game (last visited Jun. 20, 2025)
1019	Dungeons & Dragons, Player's Handbook – Deluxe Edition, Wizards of the Coast, 4th Edition (Oct. 2008)
1020	Dungeons & Dragons, Player's Handbook, Wizards of the Coast, 4th Edition (Jun. 2008)
1021	Dungeons & Dragons, Rules Compendium, Wizards of the Coast, 4th Edition (Sep. 2010)
1022	Rolemaster Arms Law & Claw Law, Iron Crown Enterprises Inc., 2nd Edition (Sep. 1989)
1023	Rolemaster Character Law, Iron Crown Enterprises, 2nd Edition (Aug. 1999)
1024	Rolemaster Standard Rules, Iron Crown Enterprises, 1st Edition (1995)
1025	Spell Law, Iron Crown Enterprises, 2nd Edition (1989)
1026	Character Law & Campaign Law, Iron Crown Enterprises, 2nd Edition (1989)
1027	Wikipedia, the free encyclopedia, Role-playing video game, at https://web.archive.org/web/20100819005654/ http://en.wikipedia.org/wiki/Computer_role-playing_game (last visited Jun. 18, 2025)
1028	Wikipedia, the free encyclopedia, Massively multiplayer online role-playing game, at https://web.archive.org/web/20100716092631/ http://en.wikipedia.org/wiki/Massively_multi-player_online_role-playing_game (last visited Jun. 18, 2025)
1029	Wikipedia, the free encyclopedia, Pocket Legends, at https://web.archive.org/web/20110606025458/ https://en.wikipedia.org/wiki/Pocket_Legends (last visited Jun. 18, 2025)
1030	Wikipedia, the free encyclopedia, Virtual world, at https://web.archive.org/web/20110917110743/ http://en.wikipedia.org/wiki/Virtual_world (last visited Jun. 18, 2025)
1031	Wikipedia, the free encyclopedia, Second Life, at https://web.archive.org/web/20110331154407/ http://en.wikipedia.org/wiki/Second_Life (last visited Jun. 18, 2025)

No.	Exhibit
1032	Dan Jerker B. Svantenson, Geo-Location Technologies and Other Means of Placing Borders on the 'Borderless' Internet, 23 J. Marshall J. Computer & Info. L. 101 (2004) ("Svantenson")
1033	"Internet Gambling Company PartyGaming PLC Enters Non-Prosecution Agreement with U.S. and will Forfeit $105 Million," Press release, United States Attorney for the Southern District of New York, April 7, 2009
1034	Darrel Etherington, Shadow Cities finds that mobile gaming is surprisingly stationary, Sep. 27, 2011 at https://web.archive.org/web/20110930120146/ http://gigaom.com/2011/09/27/grey-area-mobilize-2011/ (last visited Jun. 18, 2025)
1035	Jim Squires, Shadow Cities Walkthrough, May 30, 2011 at https://web.archive.org/web/20110604160126/ https://www.gamezebo.com/games/shadow-cities/walkthrough (last visited Jun. 18, 2025)
1036	Liz Gannes, Google Launches Ingress, a Worldwide Mobile Alternate Reality Game, November 15, 2012 at https://web.archive.org/web/20121115163246/ https://allthingsd.com/20121115/google-launches-ingress-a-worldwide-mobile-alternate-reality-game/ (last visited Jun. 18, 2025)
1037	Rolemaster Fantasy Role Playing, Iron Crown Enterprises, 2nd Edition (1999)
1038	Dungeons & Dragons, Monster Manual Deluxe Edition, Wizards of the Coast, 4th Edition (Jun. 2008)
1039	Wikipedia, the free encyclopedia, Statistic (role-playing games), at https://web.archive.org/web/20100525145809/ http:/en.wikipedia.org:80/wiki/Statistic_%28role-playing_games%29 (last visited Jun. 4, 2025)
1040	Wikipedia, the free encyclopedia, Attribute (role-playing games), at https://web.archive.org/web/20100402035320/ http:/en.wikipedia.org/wiki/Attribute_%28role-playing_games%29 (last visited Jun. 4, 2025)
1041	Wikipedia, the free encyclopedia, level up, at https://web.archive.org/web/20100316125915/ http:/en.wiktionary.org:80/wiki/level_up (last visited Jun. 4, 2025)

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1042	Wikipedia, the free encyclopedia, Experience point, at https://web.archive.org/web/20100403064932/ http:/en.wikipedia.org/wiki/Experience_point (last visited Jun. 4, 2025)
1043	U.S. Patent Application Publication No. 2009/0149248
1044	U.S. Patent Application Publication No. 2011/0183754 ("Alghamdi")
1045	U.S. Patent No. 8,639,725
1046	U.S. Patent Application Publication No. 2012/0253488
1047	The Greatest Games of All Time – Punch Out – Features at GameSpot, at https://web.archive.org/web/20071007124852/ http://www.gamespot.com/features/6122838/index.html (last visited Jul. 3, 2025)
1048	Kevin F. King, Geolocation and Federalism on the Internet: Cutting Internet Gambling's Gordian Knot, The Columbia Science and Technology Law Review Vol. XI 2010
1049	Dungeons & Dragons, Player's Handbook 2, Wizards of the Coast, 4th Edition (Mar. 2009)
1050	Sotera Stipulation Letter
1051	Memorandum, *ImagineAR, Inc. v. Niantic, Inc.*, No. 1-24-cv-01252 (D. Del. Sept. 8, 2025), ECF No. 63
1052	Scheduling Order, *ImagineAR, Inc. v. Niantic, Inc.*, No. 1-24-cv-01252 (D. Del. Oct. 8, 2025), ECF No. 88
1053	Federal Court Management Statistics, June 2025
1054	Judge Joshua D. Wolson Time to Milestone Statistics, Docket Navigator
1055	Letter Regarding Discovery Deficiencies, *ImagineAR, Inc. v. Niantic, Inc.*, No. 1-24-cv-01252 (D. Del.), dated Sept. 8, 2025
1056	Plaintiff's First and Second Supplemental Objections and Responses to Defendant's First Set of Interrogatories, *ImagineAR, Inc. v. Niantic, Inc.*, No. 1-24-cv-01252 (D. Del. Sept. 30, 2025)
1057	Andrew Kessel, *Imagination Park touts ongoing augmented reality developments in corporate update* (Mar. 10, 2020, 10:30) https://www.proactiveinvestors.com/companies/news/914663/imagination-park-

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1058	March 2, 2023 Solicitation Email from Patent Infusion
1059	March 7, 2023 Solicitation Email from Patent Infusion
1060	March 16, 2023 Solicitation Email from Patent Infusion
1061	Plaintiff's Email Regarding Case Narrowing, *ImagineAR, Inc. v. Niantic, Inc.*, No. 1-24-cv-01252 (D. Del. Sept. 19, 2025)
1062	File History of U.S. Patent Application No. 18/813,579
1063	File History of U.S. Patent Application No. 19/175,119
1064	File History of U.S. Patent Application No. 19/176,364
1065	Docket, *Aptiv Techs. AG v. Microchip Tech., Inc.*, 1:23-cv-00307 (D. Del.)
1066	Docket, *Microchip Tech., Inc. v. Aptiv Servs. US, LLC*, No. 1:23-cv-00778-JDW, (D. Del.)
1067	Docket, *L2 Mobile Techs. LLC v. TCL Electronics Holdings Limited*, 1:22-cv-01306, (D. Del.)
1068	Docket, *Microchip Technology Incorporated v. Delphi Automotive Systems, LLC*, 1:17-cv-01194 (D. Del)
1069	Scheduling Order, *Microchip Technology Incorporated v. Delphi Automotive Systems, LLC*, 1:17-cv-01194 (D. Del)
1070	Plaintiffs' Motion for Leave to File a Second Amended & Supplemental Complaint, *ImagineAR, Inc. v. Niantic, Inc.*, No. 24-1252-JDW (D. Del. Nov. 7, 2025), ECF No. 99

Respectfully submitted,

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Date: November 18, 2025

CERTIFICATE OF SERVICE

The undersigned hereby certifies that true copies of Petitioner's Updated Exhibit List and Exhibit 1070 were served upon the below-listed counsel by electronic mail:

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