

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

3D DIAGNOSTIX, INC.,
Petitioner,

v.

WATSON GUIDE IP LLC,
Patent Owner.

Case PGR2024-00040
U.S. Patent No. 11,806,209

**PETITIONER'S NOTICE OF FILING
DEMONSTRATIVE EXHIBIT 1051 FOR ORAL ARGUMENT**

PETITIONER'S EXHIBIT LIST

Exhibit	Description
1001	U.S. Patent No. 11,806,209
1002	File History of U.S. Patent No. 11,806,209
1003	Declaration of Douglas Erickson, DDS, MS
1004	Curriculum Vitae of Douglas Erickson, DDS, MS
1005	Provisional Patent Application No. 62/508,377
1006	U.S. Patent Application Publication No. 2017/0252126 to Llop ("Llop126")
1007	<i>Watson Guide IP, LLC v. 3D Diagnostix, Inc.</i> , Case No. 1:24-10518-LTS, Dkt. No. 30 (D. Mass. July 8, 2024)
1008	China Patent Application Publication No. CN 105686886A to Sichuan University ("Sichuan")
1009	Certified translation of Sichuan
1010	U.S. Patent Application Publication No. 2017/0265963 to Yau ("Yau")
1011	U.S. Patent No. 9,504,533 to Groscurth ("Groscurth")
1012	Scherer, "Clinical Demonstration: All-on-4 nSequence Guided Prosthetics Surgical Technique with Zest Anchors Chairside Attachment Processing Material", https://www.youtube.com/watch?v=VOWRdFpfngI , posted October 23, 2015 (accessed May 21, 2024) ("Scherer") (Part 1)
1013	Scherer, "Clinical Demonstration: All-on-4 nSequence Guided Prosthetics Surgical Technique with Zest Anchors Chairside Attachment Processing Material", https://www.youtube.com/watch?v=VOWRdFpfngI , posted October 23, 2015 (accessed May 21, 2024) ("Scherer") (Part 2)

Exhibit	Description
1014	File History of U.S. Patent No. 11,173,016 (excerpts)
1015	Declaration of Kathryn Talbot
1016	Internet Archive, http://nsequence.com , archived February 7, 2016 (accessed May 21, 2024)
1017	“Fundamentals of CHROME GuidedSmile”, downloaded from https://guidedsmile.com/get-your-introduction-to-chrome-guidedsmile-ebook-today/ on June 20, 2024
1018	Internet Archive, http://www.nsequence.com/2013/11/08/all-on-x-cases-immediate-provisionalization , archived March 10, 2016 (accessed June 28, 2024)
1019	Webpage printout: All-on-4® nSequence® Implant Surgical Technique Using Zest Chairside® Attachment Processing Material – YouTube, https://www.youtube.com/watch?v=VOWRdFpfGI , (accessed June 24, 2024)
1020	Webpage printout: “Why You Should Choose Metal Over Plastic”, https://www.youtube.com/watch?v=tlOWzK4h1Nc&t , posted April 15, 2021 (accessed July 10, 2024)
1021	Definition of “Enclose” from Oxford English Dictionary (accessed Nov. 5, 2024)
1022	Definition of “Enclose” from Merriam-Webster Dictionary (accessed Nov. 5, 2024)
1023	Definition of “Enclose” from Dictionary.com (accessed Nov. 5, 2024)
1024	Webpage printout: “GuidedSMILE Family of Products”, https://guidedsmile.com/guidedsmile-family-of-products , (accessed June 17, 2025)

Exhibit	Description
1025	Webpage printout: “Components of CHROME”, https://guidedsmile.com/components-of-chrome/ , (accessed June 17, 2025)
1026	Webpage printout: “GuidedSMILE Lite”, https://guidedsmile.com/guidedsmile-lite/ , (accessed June 17, 2025)
1027	Webpage printout: “GuidedSMILE Lite”, https://www.roedentallab.com/products/chrome-guidedsmile/guidedsmile-lite/ , (accessed June 22, 2025)
1028	JPEG image, https://www.roedentallab.com/hs-fs/hubfs/CHROME/Lite/Study-2/3.jpg?width=2000&height=1334&name=3.jpg , (accessed June 22, 2025)
1029	Advertising sheet, “GuidedSMILE Lite”, ROE Dental Laboratory
1030	Webpage printout and video screenshots: YouTube, Pin Guide & Fixation Base – CHROME Live Webinar Series, https://www.youtube.com/watch?v=HqxcwXUr7Os&list=PPSV , April 20, 2020 (accessed June 22, 2025)
1031	Webpage printout: Facebook, ROE Dental Laboratory, https://facebook.com/roedental , (accessed June 17, 2025)
1032	Webpage printout: YouTube, ROE Dental Laboratory, https://www.youtube.com/@ROEdentalLaboratory/videos , (accessed June 17, 2025)
1033	“Dentistry Today July-August 2023” cover and selected pages, (accessed June 22, 2025)
1034	“Dentistry Today March 2023” cover and selected pages, (accessed June 22, 2025)
1035	“Dentistry Today June 2023” cover and selected pages, (accessed June 22, 2025)

Exhibit	Description
1036	"Dentistry Today January/February 2024" cover and selected pages, (accessed June 22, 2025)
1037	"Dentistry Today May 2023" cover and selected pages, (accessed June 22, 2025)
1038	Webpage printout: Henry Schein Dental, https://www.henryschein.com/us-en/Search.aspx?searchkeyWord=mouthpiece&subtoclevel=1&pagenumber=1 , (accessed June 10, 2025)
1039	Webpage printout: Isolite Posterior CIL0801 Mouthpiece, https://www.henryschein.com/us-en/dental/p/evacuation-products/specialty-suction-systems/isolite-posterior-mouthpiece/8010181 , (accessed June 10, 2025)
1040	Webpage printout: Isolite Anterior Mouthpiece CAM0401, https://www.henryschein.com/us-en/dental/p/evacuation-products/specialty-suction-systems/isolite-anterior-mouthpiece/1473284 , (accessed June 10, 2025)
1041	RESERVED
1042	RESERVED
1043	Webpage printout: 2437 Mouthpieces, https://www.henryschein.com/us-en/dental/p/equipment-technology/equipment-accessories/mouth-prop-ster-end/6429443 , (accessed June 10, 2025)
1044	Definition of "mouthpiece" from Dictionary.com (accessed June 26, 2025)
1045	Definition of "mouthpiece" from Merriam-Webster.com (accessed June 26, 2025)
1046	Transcript, Deposition of Alan Banks, June 23, 2025
1047	Transcript, Deposition of Dr. Jeffrey A. Elo, June 26, 2025

Petitioner's Notice of Filing Demonstrative Exhibit
PGR2024-00040

Exhibit	Description
1048	U.S. Patent No. 11,173,016
1049	U.S. Patent No. 11,576,755
1050	Supplemental Declaration of Douglas M. Erickson, DDS, MS
1051	Petitioner's Demonstrative Exhibit for Oral Argument

Pursuant to the Order granting the parties' request for oral argument (Paper 21), entered on October 2, 2025, Petitioner 3D Diagnostix, Inc. files the following demonstrative exhibit:

Exhibit 1051 Petitioner's Demonstrative Exhibit for Oral Argument.

Respectfully Submitted,

Date: October 27, 2025

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Petitioner's Notice of Filing Demonstrative Exhibit 1051 for Oral Argument and accompanying Exhibit 1051, was served on October 27, 2025, on the following correspondence address of record via email:

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