

Cisco Systems, Inc., Petitioner

VS.

TQ Delta, LLC Patent Owner

PETITION FOR INTER PARTES REVIEW

OF

U.S. PATENT NO. 7,835,430



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PETITIONER'S EXHIBIT LIST

May 6, 2016

U.S. Patent No. 7,835,430 to Krinsky et al.
Prosecution File History of U.S. 8,432,956
Prosecution File History of U.S. 8,238,412
Prosecution File History of U.S. 7,835,430
Prosecution File History of U.S. 7,570,686
Prosecution File History of U.S. 6,658,052
U.S. Provisional Application No. 60/224,308
U.S. Provisional Application No. 60/174,865
Declaration of Dr. Sayfe Kiaei Under 37 C.F.R. § 1.68
Curriculum Vitae of Dr. Sayfe Kiaei
U.S. Patent No. 6,636,603 to Milbrandt
U.S. Patent No. 6,891,803 to Chang et al.
U.S. Patent No. 6,590,893 to Hwang et al.
ANSI T1.413-1995 Standard
Charles K. Summers, ADSL STANDARDS, IMPLEMENTATION, AND ARCHITECTURE (CRC Press 1999) (selected pages)
Walter Goralski, ADSL AND DSL TECHNOLOGIES (McGraw-Hill 1998) (selected pages)
Harry Newton, Newton's Telecom Dictionary, 16 th Ed. (2000) (selected pages)



1018	Valerie Illingworth and John Daintith, THE FACTS ON FILE DICTIONARY OF COMPUTER SCIENCE (Market House Books 2001) (selected pages)
1019	Thomas Starr, John M. Cioffi, Peter J. Silverman, UNDERSTANDING DIGITAL SUBSCRIBER LINE TECHNOLOGY, (Prentice Hall 1999) (selected pages)
1020	Andrew S. Tanenbaum, COMPUTER NETWORKS (Prentice Hall 1996) (selected pages)
1021	B. P. Lathi, Modern Digital and Analog Communication Systems (Oxford University Press 1998) (selected pages)
1022	Behzad Razavi, RF MICROELECTRONICS (Prentice Hall 1997) (selected pages)
1023	Declaration of David Bader



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