

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZTE (USA) INC.

Petitioner,

v.

FUNDAMENTAL INNOVATION SYSTEMS INTERNATIONAL LLC
Patent Owner.

Case IPR2018-00111
Patent No. 8,624,550

PATENT OWNER'S SUR-REPLY

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| Ex. 2001 | Declaration of Kenneth Fernald, Ph.D. in Support of Fundamental Innovation Systems International LLC's Patent Owner Preliminary Response |
| Ex. 2002 | Declaration of Mr. Steven Rogers in Support of Fundamental Innovation Systems International LLC's Patent Owner Preliminary Response |
| Ex. 2003 | Jan Axelson, <i>USB Complete</i> (1999), excerpt |
| Ex. 2004 | U.S. Patent No. 5,884,086 ("Amoni") |
| Ex. 2005 | Deposition Transcript of John Garney (Nov. 20, 2017) in <i>Fundamental Innovation Sys. Int'l LLC v. Samsung Electronics Co.</i> (E.D. Tex.), excerpt |
| Ex. 2006 | Jan Axelson, <i>USB Complete</i> (2d ed. 2001), excerpt |
| Ex. 2007 | Sheasby PHV Declaration |
| Ex. 2008 | Fundamental-Samsung Settlement Agreement (Confidential) |
| Ex. 2009 | 2018-07-02 Hearing Transcript |
| Ex. 2010 | Deposition Transcript of John Garney (Nov. 20, 2017) in <i>Fundamental Innovation Sys. Int'l LLC v. Samsung Electronics Co.</i> (E.D. Tex.), full transcript |
| Ex. 2011 | Declaration of Kenneth Fernald, Ph.D. in Support of Fundamental Innovation Systems International LLC's Patent Owner Response |
| Ex. 2012 | Declaration of Mr. Steven Rogers in Support of Fundamental Innovation Systems International LLC's Patent Owner Response |
| Ex. 2013 | Deposition Transcript of Mr. James T. Geier in IPR2018-00111 (July 30, 2018) |
| Ex. 2014 | ZTE (TX) Inc.'s corporate disclosure statement in <i>Fractus, S.A. v. ZTE Corp. et al.</i> , Civ. No. 2:17-cv-00561-JRG (Sept. 25, 2017, E.D. Tex.) |
| Ex. 2015 | ZTE (USA) and ZTE (TX) Inc.'s corporate disclosure statement in <i>Saint Lawrence Communications LLC v. ZTE</i> |

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| | <i>Corp. et al.</i> , Civ. No. 2:15-cv-00349-JRG (May 26, 2015, E.D. Tex.) |
| Ex. 2016 | Amended complaint in <i>Fundamental Innovation Sys. Int'l LLC v. ZTE Corp.</i> , 2:17-cv-00124-JRG (E.D. Tex.), now transferred to N.D. Tex. as 3:17-cv-01827-N. |
| Ex. 2017 | Declaration of Chao Shan in Support of ZTE's Motion to Dismiss in <i>Fractus, S.A. v. ZTE Corp. et al.</i> , Civ. No. 2:17-cv-00561-JRG (Sept. 25, 2017, E.D. Tex.) |
| Ex. 2018 | LG Electronics Inc. Corporate Structure Tree |
| Ex. 2019 | 2016-2017 LG Electronics Sustainability Report |
| Ex. 2020 | Excerpts from LG Corporation Annual Report (2017) (translated from Korean) |
| Ex. 2021 | LG Corporation Key Developments Report |
| Ex. 2022 | Jan Axelson, <i>USB Complete</i> (2d ed. 2001), additional excerpt |
| Ex. 2023 | Deposition Transcript of Daniel Fischer (May 9, 2018) in <i>Fundamental Innovation Sys. Int'l LLC v. Samsung Electronics Co. et al.</i> (E.D. Tex.), <i>Fundamental Innovation Sys. Int'l LLC v. LG Electronics, Inc. et al.</i> (E.D. Tex.), <i>Fundamental Innovation Sys. Int'l LLC v. Huawei Device Co., Ltd. et al.</i> (E.D. Tex.), <i>Fundamental Innovation Sys. Int'l LLC v. ZTE Corp. et al.</i> (N.D. Tex.), excerpt |
| Ex. 2024 | LinkedIn public profile of Dan Radut |
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| Ex. 2026 | LinkedIn public profile of Michael Habicher |
| Ex. 2027 | Fundamental-LG Settlement Agreement (Confidential) |
| Ex. 2028 | 2018-11-28 Hearing Transcript |
| Ex. 2029 | ZTE (TX), Inc.'s answer to Fundamental's Amended Complaint |
| Ex. 2030 | ZTE USA, Inc.'s answer to Fundamental's Amended Complaint |
| Ex. 2031 | ZTE Corporation's answer to Fundamental's Amended Complaint |
| Ex. 2032 | Zhong Declaration regarding www.ztetx.com |

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