

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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ZTE (USA) INC.,  
SAMSUNG ELECTRONICS CO., LTD.,<sup>1</sup>

Petitioner,

v.

BELL NORTHERN RESEARCH, LLC,

Patent Owner.

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Case No. IPR2019-01365

Patent No. 7,039,435

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**PETITIONER'S UPDATED EXHIBIT LIST**

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<sup>1</sup> Samsung Electronics Co., Ltd., who filed a petition in IPR2020-00697, has been joined as a petitioner in this proceeding.

## EXHIBIT LIST

| Exhibit           | Description  |
|-------------------|--|
| 1001              | U.S. Pat. No. 7,039,435 to McDowell et al. (“the ’435 patent”)   |
| 1002              | File History of the ’435 Patent  |
| 1003 <sup>2</sup> | Declaration of Dr. Jonathan Wells  |
| 1004              | Certified English Translation of European Patent Publication EP 1091498 by Baiker (“Baiker”)   |
| 1005              | U.S. Patent No. 6,456,856 to Werling (“Werling”)   |
| 1006              | PCT Patent Publication WO 2002/05443 by Irvin (“Irvin”)  |
| 1007              | U.S. Patent No. 6,018,646 to Myllymäki (“Myllymäki”)   |
| 1008              | U.S. Pat. No. 5,390,338 to Bodin (“Bodin”)   |
| 1009              | Joint Claim Construction Chart, Worksheet, and Hearing Statement in <i>Bell Northern Research, LLC, v. ZTE Corporation, ZTE (USA) Inc., and ZTE (TX), Inc.</i> (Case No. 3:18-cv-1786) (S.D. Cal.) |
| 1010              | U.S. Provisional Patent Application No. 09/612,034 by Irvin (“Irvin Provisional”)  |
| 1011              | Michael Barr, <i>Programming Embedded Systems in C and C++</i> (O’Reilly & Associates, 1999)   |
| 1012              | Rudolf F. Graf, <i>Modern Dictionary of Electronics</i> (Butterworth-Heinemann, 1999)  |
| 1013              | Harry Newton, <i>Newton’s Telecom Dictionary</i> (Miller Freeman, Inc., 1999)  |
| 1014              | Webster’s II New College Dictionary (Houghton Mifflin Co, 1999)  |
| 1015              | Martin H. Weik, <i>Fiber Optics Standard Dictionary</i> (Chapman & Hall, 1997)   |
| 1016              | European Patent Publication EP 1091498 (“Baiker”)  |
| 1017              | Webster’s New World College Dictionary (Simon & Schuster, 1997)  |

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<sup>2</sup> Exhibit 1003 is a verbatim copy of the Declaration of Jonathan Wells submitted on behalf of Petitioner Huawei in support of their Petition for *Inter Partes* Review of the 7,039,435 patent in IPR2019-01186.

| <b>Exhibit</b> | <b>Description</b>   |
|----------------|--|
| 1018           | U.S. Patent No. 6,029,074 to Irvin (“Irvin ’074”)  |
| 1019           | Defendants’ Joint Opening Claim Construction Brief in <i>Bell Northern Research, LLC, v. ZTE Corporation, ZTE (USA) Inc., and ZTE (TX), Inc.</i> (Case No. 3:18-cv-1786) (S.D. Cal.)   |
| 1020           | Plaintiff’s Opening Claim Construction Brief in <i>Bell Northern Research, LLC, v. ZTE Corporation, ZTE (USA) Inc., and ZTE (TX), Inc.</i> (Case No. 3:18-cv-1786) (S.D. Cal.)   |
| 1021           | Supplemental Joint Claim Construction Hearing Statement Pursuant to P.L.R. 4.2 in <i>Bell Northern Research, LLC, v. ZTE Corporation, ZTE (USA) Inc., and ZTE (TX), Inc.</i> (Case No. 3:18-cv-1786) (S.D. Cal.)   |
| 1022           | Defendants’ Joint Responsive Claim Construction Brief in <i>Bell Northern Research, LLC v. ZTE Corporation, ZTE (USA) Inc., and ZTE (TX), Inc.</i> (Case No. 3:18-cv-1786) (S.D. Cal.)   |
| 1023           | Plaintiff’s Responsive Claim Construction Brief in <i>Bell Northern Research, LLC v. ZTE Corporation, ZTE (USA) Inc., and ZTE (TX), Inc.</i> (Case No. 3:18-cv-1786) (S.D. Cal.)   |
| 1024           | Redline Comparison of this Petition and Petition filed in IPR2019-01186 (“Huawei IPR”)   |
| 1025           | Claim Construction Order and Order on Motions for Summary Judgment in <i>Bell Northern Research, LLC, v. ZTE Corporation, ZTE (USA) Inc., and ZTE (TX), Inc.</i> (Case No. 3:18-cv-1786) (S.D. Cal.)   |
| 1026           | Transcript of June 20, 2019 Hearing in <i>Bell Northern Research, LLC, v. Bell Northern Research, LLC, v. ZTE Corporation, ZTE (USA) Inc., and ZTE (TX), Inc.</i> (Case No. 3:18-cv-1786) (S.D. Cal.)  |
| 1027           | Order on Request for Pre-Institution Stay of the Litigation (August 12, 2019) in <i>Bell Northern Research, LLC, v. ZTE Corporation, ZTE (USA) Inc., and ZTE (TX), Inc.</i> (Case No. 3:18-cv-1786) (S.D. Cal.)  |
| 1028           | Order on Confirming Settlement and Setting Deadline to File Joint Motion for Dismissal (October 24, 2019) in <i>Bell Northern Research, LLC, v. Bell Northern Research, LLC, v. Huawei Technologies Co., Ltd. et al.</i> (Case No. 3:18-cv-1784) (S.D. Cal.) |
| 1029           | Settlement Agreement Between ZTE and BNR<br><b>BUSINESS CONFIDENTIAL INFORMATION – BOARD ONLY</b>  |

Dated: August 26, 2020

Respectfully submitted,

*/Amol A Parikh/*

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of the foregoing  
PETITIONERS' UPDATED EXHIBIT LIST was served in its entirety this 26th  
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