UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD

PHILIP MORRIS PRODUCTS, S.A., Petitioner

v.

RAI STRATEGIC HOLDINGS, INC., Patent Owner

Patent No. 9,901,123

Inter Partes Review No. IPR2020-00919

PATENT OWNER'S SUR-REPLY TO PETITIONER'S REPLY TO PATENT OWNER'S PRELIMINARY RESPONSE



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Ex. 2001	Tobacco Tactics, "Heated Tobacco Products," https://tobaccotactics.org/wiki/heated-tobacco-products/
Ex. 2002	Invalidity Claim Chart C3 from ITC Investigation No. 337-TA-1199
Ex. 2003	U.S. Patent No. 5,954,979
Ex. 2004	U.S. Patent No. 5,730,158
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Ex. 2015	U.S. Patent No. 5,880,439
Ex. 2016	U.S. Patent No. 5,902,501
Ex. 2017	U.S. Patent No. 6,040,560
Ex. 2018	U.S. Patent No. 5,865,185



Ex. 2019	European Patent Publication No. EP0917830A1
Ex. 2020	European Patent Publication No. EP0703734A1
Ex. 2021	PCT Patent Publication No. WO9632854A2
Ex. 2022	PCT Patent Publication No. WO9406314A1
Ex. 2023	PCT Patent Publication No. WO9527412A1
Ex. 2024	Accord 2001 Update, https://www.industrydocuments.uscf.edu/docs/jxlx0179 (PM3001487472-PM3001487482)
Ex. 2025	Glenn Collins, "Analysts Mixed on Philip Morris's Smoking System," The New York Times (Oct. 24, 1997)
Ex. 2026	Complaint from ITC Investigation No. 337-TA-1199
Ex. 2027	Notice of Institution of Investigation from ITC Investigation No. 337-TA-1199
Ex. 2028	Excerpt of Respondents' invalidity contentions from ITC Investigation No. 337-TA-1199
Ex. 2029	Procedural Schedule from ITC Investigation No. 337-TA-1199
Ex. 2030	Order Granting Defendants' Unopposed Motion to Invoke the Statutory Stay of Plaintiffs' Claims Relating to U.S. Patent Nos. 9,839,238, 9,901,123, and 9,930,915 Pursuant to 28 U.S.C. § 1659 from E.D. Virginia Case No. 1:20-cv-00393-LO-TCB dated June 18, 2020
Ex. 2031	Reply of Philip Morris Products, SA to Withers & Rogers LLP's Opposition to the Grant of EP2800486 dated November 6, 2017
Ex. 2032	Reply of Philip Morris Products, SA to Withers & Rogers LLP's Opposition to EP2782463 dated September 15, 2017



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