

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTERNATIONAL BUSINESS MACHINES CORPORATION
Petitioner

v.

SECURITY FIRST INNOVATIONS, LLC
Patent Owner

Case No. IPR2025-01200
U.S. Patent No. 8,271,802

PETITIONER'S UPDATED EXHIBIT LIST¹

¹ Filed pursuant to the Board's authorization provided via e-mail on August 15, 2025.

PETITIONER’S TABLE OF EXHIBITS

Exhibit No.	Description
1001	U.S. Patent No. 8,271,802 ('802 Patent)
1002	Declaration of Dr. Erez Zadok
1003	U.S. Patent Publication No. 2003/0065656 (“Torre”)
1004	U.S. Patent Publication No. 2003/0028493 (“Tajima”)
1005	U.S. Patent Publication No. 2004/0030921 (“Aldridge”)
1006	“Secret Sharing Made Short,” Hugo Krawczyk, Advances in Cryptology - CRYPTO '93, 13th Annual International Cryptology Conference, LNCS 773, 136-146, 1993 (“Krawczyk”)
1007	U.S. Patent Publication No. 2003/0200176 (“Foster”)
1008	U.S. Patent Publication No. 2004/0049687 (“Orsini”)
1009	File History of U.S. Patent No. 8,271,802
1010	File History of U.S. Patent Application No. 11/258,839
1011	File History of U.S. Patent Application No. 13/371,363
1012	Comparison Of The '802 Patent’s Specification And Orsini
1013	<i>Google, LLC v. Security First Innovations, LLC</i> , IPR2024-00212, Exhibit 1043 (Patent Owner’s Proposed Claim Constructions In <i>Security First Innovations, LLC v. Google, LLC</i> , No. 2:23-cv-00097 (E.D. Va.)) (“PO’s Google Litigation Construction”)
1014	U.S. Provisional Application No. 60/622,146
1015	U.S. Provisional Application No. 60/718,185
1016	Microsoft Computer Dictionary, 5 th ed., 2002, excerpts (“Microsoft Computer Dictionary”)
1017	Bruce Schneier, Applied Cryptography, 2 nd ed., 1996, excerpts (“Schneier”)
1018	Curriculum Vitae of Dr. Erez Zadok
1019	Yitzhak Birk, “Random RAIDs with Selective Exploitation of Redundancy for High Performance Video Servers,” IEEE 1997 (“Birk”)
1020	U.S. Patent Publication No. 2003/0016596A1 (“Chiquoine”)
1021	Declaration of Dr. Hall-Ellis (“Hall-Ellis Decl.”)
1022	John Kubiawicz, et al., “OceanStore: An Architecture for Global-Scale Persistent Storage,” ACM 2000 (“Kubiawicz”)
1023	U.S. Patent No. 6,226,618 (“Downs”)

Exhibit No.	Description
1024	P. Venkat Rangan et al., “Designing File Systems for Digital Video and Audio,” ACM SIGOPS Operating Systems Review, Volume 25, Issue 5, 81–94 (1991) (“Rangan”)
1025	<i>Sotera</i> Stipulation

Dated: August 16, 2025

Respectfully submitted,

/Taeg Sang Cho/

Taeg Sang Cho (Reg. No. 69,618)

DESMARAIS LLP

230 Park Ave

New York, NY 10169

212-808-1060 (telephone)

212-351-3401 (facsimile)

Counsel for Petitioner

International Business Machines Corporation

CERTIFICATE OF SERVICE

The undersigned certifies that on August 16, 2025, complete a copy of the foregoing **Petitioner's Updated Exhibit List and corresponding exhibit (*Sotera Stipulation*)** was served on counsel of record for the Patent Owner by filing the documents through P-TACTS and by sending via electronic mail to the following addresses:

Stephen J. Elliott (Reg. No. 52,858)
elliotts@sullcrom.com
Sullivan & Cromwell LLP
125 Broad St., New York, NY 10004
Telephone: (212) 558-7446

Andrei Iancu (Reg. No. 41,862)
iancua@sullcrom.com
Dustin F. Guzior
guziord@sullcrom.com
Haley M. Sanders
sandersh@sullcrom.com
Sullivan & Cromwell LLP
125 Broad St., New York, NY 10004
Telephone: (212) 558-7446
Facsimile: (212) 291-9868

Kenneth J. Weatherwax(Reg. No. 54,528)
weatherwax@lowensteinweatherwax.com
Nathan Lowenstein
lowenstein@lowensteinweatherwax.com
Colette Woo
woo@lowensteinweatherwax.com
Dennis J. Courtney
courtney@lowensteinweatherwax.com
Lowenstein & Weatherwax LLP
1016 Pico Blvd, Santa Monica, CA 90405
Telephone: (310) 307-4503

Dated: August 16, 2025

Respectfully submitted,

/Taeg Sang Cho/
Taeg Sang Cho (Reg. No. 69,618)
DESMARAIS LLP

Counsel for Petitioner
International Business Machines Corporation