

Exhibit A

Exhibit A**Agreed Claim Terms**¹²

#	Claim Term	Claims	Joint Proposed Construction
1	“In a multi-cell orthogonal frequency division multiple access (OFDMA) wireless communication system comprising a plurality of base stations and mobile stations, a mobile station configured to communicate with a serving base station in a cell via a communication”	’366 Patent, Claim 1	The preamble is limiting ordinary meaning.

¹ Volkswagen Grp. of Am., Inc. and Volkswagen Grp. of Am. Chattanooga Operations, LLC take no position on the proposed constructions for any of the Agreed Claim Terms. That said, Volkswagen Grp. of Am., Inc. and Volkswagen Grp. of Am. Chattanooga Operations, LLC understand that they will be bound by the construction ruling set forth by the Court.

² Neo Wireless objects to the Volkswagen Defendants’ decision to take no position on any of the proposed constructions (contravening the parties’ agreed Discovery Plan, which Volkswagen signed). This is an attempt by the Volkswagen Defendants, in the IPRs that they alone filed, to adopt broad interpretations to support their non-infringement positions; while accepting the benefit of the other Defendants’ narrow, incompatible interpretations to support their non-infringement positions. It is especially bizarre in the context of this Exhibit, which is titled “Agreed Claim Constructions” (that one defendant apparently does not agree to). Neo is continuing to litigate with Volkswagen about this issue.

Exhibit A

	channel, the mobile station comprising:”		
2	“In an orthogonal frequency division multiple access (OFDMA) wireless communication system, a method for signal transmission by a mobile station to a serving base station via a communication channel, the method comprising:”	’366 Patent, Claim 17	The preamble is limiting ordinary meaning.
3	“A mobile station comprising:”	’908 Patent, Claim 1	The preamble is limiting ordinary meaning.
4	“A mobile device in a wireless packet system using a frame structure of multiple frames for transmission, each frame comprising a plurality of time intervals, each time	’450 Patent, Claim 7	The preamble is limiting ordinary meaning.

Exhibit A

	interval comprising a plurality of orthogonal frequency division multiplexing (OFDM) symbols, and each OFDM symbol containing a plurality of frequency subcarriers, the mobile device configured to:”		
5	“A link adaption method by a mobile station served by a serving base station in an Orthogonal Frequency Division Multiplexing (OFDM) communication system, the communication system utilizing a transmission structure with time slots in the time domain and frequency subchannels in the frequency domain, the method comprising:”	’941 Patent, Claim 8	The preamble is limiting ordinary meaning.

Exhibit A

6	“A mobile station served by a serving base station in an Orthogonal Frequency Division Multiplexing (OFDM) communication system, the communication system utilizing a transmission structure with time slots in the time domain and frequency subchannels in the frequency domain, the mobile station comprising a receiver configured to:”	’941 Patent, Claim 13	The preamble is limiting ordinary meaning.
7	“A mobile device in an Orthogonal Frequency Division Multiplexing (OFDM) communication system, the mobile device comprising”	’302 Patent, Claim 23	The preamble is limiting ordinary meaning.
8	“An orthogonal frequency division multiple access	’512 Patent, Claim 15	The preamble is limiting ordinary meaning.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.