

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, where the parties have agreed claim constructions (that one defendant apparently does not agree to). Neo is continuing to litigate with Volkswagen about this issue.

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	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.

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	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.

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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.

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