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Disputed Claim Terms[12]

#	Proposed By	Claim Term	Claims	Plaintiff's Proposed Construction	
1	Defendants	"configured to"	'366 Patent, Claims 1 & 5; '908 Patent, Claims 1–3 & 9; '450 Patent, Claim 7; '941 Patent, Claims 13 & 14; '302 Patent, Claim 23; '512 Patent, Claim 15	Plain and ordinary meaning. No construction necessary. Alternatively, if a construction is necessary: An apparatus/element is "configured to" perform a function if it includes hardware and/or software enabling the	"de

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[1] Volkswagen Grp. of Am., Inc. and Volkswagen Grp. of Am. Chattanooga Operations, Ll
position on the proposed constructions for any of the Disputed Claim Terms. That said, Volkswa
Inc. and Volkswagen Grp. of Am. Chattanooga Operations, LLC understand that they will be bo
construction ruling set forth by the Court.

[2] Neo Wireless objects to the Volkswagen Defendants' decision to take no position on any
(contravening the parties' agreed Discovery Plan, which Volkswagen signed). This is an attempt
Volkswagen Defendants, in the IPRs that they alone filed, to adopt broad interpretations to supp
positions; while accepting the benefit of the other Defendants' narrow, incompatible interpretatio
support their non-infringement positions. Neo is continuing to meet and confer with Volkswager

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				apparatus/element to perform the function.	
2	Defendants	"the ranging signal exhibits a low peak-to-average power ratio in the time domain"	'366 Patent, Claims 1 & 17	Plain and ordinary meaning. No construction necessary. Alternatively, to the extent construction is deemed necessary, "exhibits a low peak-to-average power ratio in the time domain" means "exhibits a peak-to-average power ratio in the time domain of 9dBs or less."	Ind
3	Defendants	"a ranging sequence selected from a set of ranging sequences"	'366 Patent, Claims 1 & 17	Plain and ordinary meaning. No construction necessary.	"a r sele app of r
4	Jointly Proposed	"wherein the portion of the frequency band used for transmission of the	'908 Patent, Claim 4	"wherein the portion of the frequency band used for transmission of the random access signal does not overlap	"wh of t use of t sign

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		random access signal does not include control channels"		with the portions of the frequency band used for control channels"	incl carr info
5	Defendants	"associated with"	'908 Patent, Claims 1–2 & 9	Plain and ordinary meaning. No construction necessary.	"ide
6	Defendants	"random access signal"	'908 Patent, Claims 1–2, 4, & 6–9	Plain and ordinary meaning. No construction necessary.	"di spre sigr
7	Defendants	"time-frequency resource unit"	'450 Patent, Claims 7 & 11	Plain and ordinary meaning. No construction necessary.	"a c tim unit acc app requ app bei

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| 8 | Jointly Proposed | "the antenna transmission scheme comprising a transmission diversity scheme or a multiple-input multiple-output (MIMO) scheme" | '941 Patent, Claims 8 & 13 | "the antenna transmission scheme is capable of comprising either a MIMO scheme or a transmission diversity scheme other than MIMO. To avoid any doubt, this requires supporting both MIMO and non-MIMO transmission diversity systems." | "the spe para alte an a tran that MII ante sch tran sch MII ante sch con MII tran sch MII dou sup MII MII dive |

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