

# *Exhibit B*

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**Subject:** Neo Wireless, LLC Patent Litigation No. 2:22-md-03034-TGB - Defendants' Election of Prior Art References/Products  
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Counsel,

Per the Court's Order (Dkt. No. 102), the Defendants elect the following 48 prior art references/products based on the information known to them to date. Consistent with the Order, the Defendants reserve the right to add additional prior art references, including in light of any decision on any pending or to be filed IPR, or for other good cause shown at a later date.

- Air Interface for Fixed Broadband Wireless Access Systems Part A: Systems between 2 and 11 GHz from IEEE 802.16ab-01/01r1, July 2001. ("802.16ab-2001")
- HIPERLAN Type 2 ("HiperLAN/2 Specification")
- IEEE 802.16 Broadband Wireless Access Working Group, Draft Document for SC-FDE PHY Layer System for Sub 11 GHz BWA ("IEEE 802.16c-01/32")
- IEEE 802.16.4c-01/01 IEEE 802.16 Broadband Wireless Access Working Group. Initial OFDMA proposal for the 802.16.4 PHY layer ("802.16.4")
- IEEE Std 802.16, 2004 Edition, IEEE Standard for Local and metropolitan area networks, Part 16: Air Interface for Fixed Broadband Wireless Access Systems ("IEEE802.16-2004")
- IEEE Std 802.16a-2001 "IEEE Standard for Local and metropolitan area networks Part 16: Air Interface for Fixed Broadband Wireless Access Systems," approved on December 6, 2001 and published by IEEE on April 8, 2002 ("802.16a-2001")
- IEEE Std 802.16a™-2003, Part 16: Air Interface for Fixed Broadband Wireless Access Systems—Amendment 2: Medium Access Control Modifications and Additional Physical Layer Specifications for 2–11 GHz, IEEE Computer Society and the IEEE Microwave Theory and Techniques Society ("802.16a-2003")
- International Patent Application Publication No. WO 2004/049618A1 to Kim et al. ("Kim '618")
- International Patent Application Publication No. WO 2005/041448 to Kim et al. ("Kim '448")
- International Patent Application Publication No. WO 99/60729 to Frank et al. ("Frank")
- Jerry D. Gibson, "The Mobile Communications Handbook," 2nd Edition, CRC Press LLC, 1999. ("Gibson").
- KR Patent Application Publication No. 2003-0058589 to Jeong et al. ("Jeong '589")
- S. Kaiser and K. Fazel, "A flexible spread-spectrum multi-carrier multiple-access system for multi-media applications," Proceedings of 8th International Symposium on Personal, Indoor and Mobile Radio Communications - PIMRC '97, 1997, pp. 100-104 vol.1, doi: 10.1109/PIMRC.1997.624371 ("Kaiser")
- U.S. Patent Application Publication No. 2002/0119781 A1 to Li et al. ("Li '781")
- U.S. Patent Application Publication No. 2002/0154705 to Walton et al. ("Walton '705")
- U.S. Patent Application Publication No. 2002/0172308 to Harel et al. ("Harel '308")
- U.S. Patent Application Publication No. 2003/0072254 to Ma et al. ("Ma '254")
- U.S. Patent Application Publication No. 2003/0072255 to Ma et al. ("Ma '255")
- U.S. Patent Application Publication No. 2003/0125040 A1 to Walton et al. ("Walton '040")
- U.S. Patent Application Publication No. 2003/0179776 to Sumasu et al. ("Sumasu '776")
- U.S. Patent Application Publication No. 2004/0001429 to Ma et al. ("Ma '429")
- U.S. Patent Application Publication No. 2004/0081123 to Krishnan et al. ("Krishnan '123")
- U.S. Patent Application Publication No. 2004/0081131 to Walton et al. ("Walton '131")
- U.S. Patent Application Publication No. 2004/0095902 to Laroia et al. ("Laroia '902")
- U.S. Patent Application Publication No. 2004/0131007 to Smee et al. ("Smee '007")
- U.S. Patent Application Publication No. 2004/0136464 to Suh et al. ("Suh '464")
- U.S. Patent Application Publication No. 2004/0179627 to Ketchum et al. ("Ketchum '627")

- U.S. Patent Application Publication No. 2005/0058089 to Vijayan et al. (“Vijayan ’089”)
- U.S. Patent Application Publication No. 2005/0075148 to Park (“Park ’148”)
- U.S. Patent Application Publication No. 2005/0141475 to Vijayan et al. (“Vijayan ’475”)
- U.S. Patent Application Publication No. 2005/0277429 to Laroia et al. (“Laroia ’429”)
- U.S. Patent Application Publication No. 2005/0289256 to Cudak et al. (“Cudak ’256”)
- U.S. Patent Application Publication No. 2006/0039274 to Park et al. (“Park ’274”)
- U.S. Patent Application Publication No. 2006/0269005 to Laroia et al. (“Laroia ’005”)
- U.S. Patent No. 5,909,436 to Engstrom et al. (“Engstrom ’436”)
- U.S. Patent No. 6,510,133 to Uesugi (“Uesugi ’133”)
- U.S. Patent No. 6,574,267 to Kanterakis et al. (“Kanterakis”)
- U.S. Patent No. 6,937,592 to Heath et al. (“Heath”).
- U.S. Patent No. 7,020,110 to Walton et al. (“Walton ’110”)
- U.S. Patent No. 7,120,395 to Tong et al. (“Tong ’395”)
- U.S. Patent No. 7,126,996 to Classon et al. (“Classon ’996”)
- U.S. Patent No. 7,418,043 to Shattil (“Shattil ’043”)
- U.S. Patent No. 7,508,798 to Tong et al. (“Tong ’798”)
- U.S. Patent No. 7,551,546 to Ma et al. (“Ma ’546”)
- U.S. Patent No. 8,320,301 to Walton et al. (“Walton ’301”)
- U.S. Patent No. 8,934,445 to Li et al. (“Li ’445”)
- U.S. Patent No. 10,355,825 to Agrawal (“Agrawal ’825”)
- Universal Mobile Telecommunications System (UMTS); UMTS Terrestrial Radio Access (UTRA); Concept evaluation (UMTS 30.06 version 3.0.0), TR 101 146 V3.0.0 (“TR 101 146”)

Regards,

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