

# *Exhibit F*

**From:** [Conrad Gosen](#)  
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**Subject:** RE: 2:22-md-03034-TGB NEO Wireless, LLC Patent Litigation  
**Date:** Monday, December 18, 2023 2:39:05 PM

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Counsel,

Per the Court's Order (Dkt. No. 102) and Mr. Stewart's email from December 11, 2023, the Defendants elect the following 18 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 Neo's motion for reconsideration of the claim construction order, or for other good cause shown at a later date.

- IEEE Std 802.16-2001 "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 ("802.16-2001" or "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")
- Jerry D. Gibson, "The Mobile Communications Handbook," 2nd Edition, CRC Press LLC, 1999. ("Gibson").
- 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. 2003/0125040 A1 to Walton et al. ("Walton '040")
- U.S. Patent Application Publication No. 2005/0058089 to Vijayan et al. ("Vijayan '089")
- 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. 6,510,133 to Uesugi ("Uesugi '133")
- U.S. Patent No. 7,126,996 to Classon et al. ("Classon '996")
- 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. 5,521,937 to Kondo et al. ("Kondo")
- Project Angel

Regards,

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**From:** James F. Smith <jsmith@caldwellcc.com>  
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**Subject:** 2:22-md-03034-TGB NEO Wireless, LLC Patent Litigation

[This email originated outside of F&R.]

Counsel,

Per the Court’s Order (Dkt. 102), Neo elects the following 18 claims based on the information known to it to date.

- 908 claims 1-10
- 941 Claims 8, 12, 13, 14
- 450 Claims 7, 11
- 302 Claims 23, 29

Consistent with the Order, Neo reserves the right to modify these selections. For example, if the court grants Neo’s pending motion for reconsideration on the 366 patent, then Neo plans to modify its elections to include one or more of claims 1, 3, 5, 17, and 21 of the 366 patent.

Best,  
James

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