

Exhibit G

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.

Petitioner,

v.

NEO WIRELESS LLC,

Owner.

Case IPR 2022-01537

U.S. Patent No. 10,075,941

1 MR. RIFFE: Objection. Calls for a legal
2 conclusion.

3 A. Well, here the claim language itself
4 provides a guide for what a subchannel configuration
5 is. So it's right in the wherein clause. Starting
6 at line 25 it says: "The corresponding subchannel
7 configuration characterized by distributed
8 subcarriers or localized carriers in the frequency
9 domain."

10 BY MR. HENDIFAR:

11 Q. Right. I'm not asking you what the
12 configuration entails -- well, I think I may -- let
13 me ask you a more fundamental question then.

14 Is it your opinion that claim 1 requires
15 the control message that is transmitted to the mobile
16 station to include an actual indicator that specifies
17 whether the subchannel configuration is distributed
18 or localized?

19 MR. RIFFE: Objection. Calls for a legal
20 conclusion.

21 A. I don't think that's what the claim says.
22 It says that there's an indicator. That's at Line

1 21. It's an indicator of the corresponding
2 subchannel configuration. That's in lines 21 and 22.

3 The last part of the claim starting at
4 lines 25 through 28 just require that the
5 corresponding subchannel configuration is
6 characterized by distributed subcarriers or localized
7 subcarriers.

8 That's what's within the scope of the
9 claim. So starting at line 25, that's just
10 indicating a characterization of the alternative
11 subcarrier or subchannel configurations.

12 BY MR. HENDIFAR:

13 Q. So if I understood you correctly -- and
14 please correct me if I'm wrong -- in your opinion,
15 claim 1 does not require that the indicator in the
16 control message actually indicates in the control
17 message whether the subchannel configuration is
18 localized or distributed, correct?

19 MR. RIFFE: Objection. Mischaracterizes
20 testimony. Calls for a legal conclusion.

21 A. Well, what the claim language requires is
22 an indicator of the corresponding subchannel

1 configuration. That's what the indicator is. The
2 claim language then further defines what is meant by
3 subchannel configuration in terms of its
4 characteristic.

5 BY MR. HENDIFAR:

6 Q. I don't believe that was responsive to my
7 question, but let me start more fundamentally.

8 Do you believe that the claim requires,
9 for example, a bit in the control message that
10 indicates whether the subchannel configuration is
11 localized or distributed?

12 MR. RIFFE: Objection. Calls for a legal
13 conclusion.

14 A. No. I don't think that this claim
15 requires that said bit. It just requires an
16 indicator of the subchannel configuration. It
17 doesn't say that the indicator has to indicate what
18 kind of configuration. It just has to be an
19 indicator of the subchannel configuration.

20 BY MR. HENDIFAR:

21 Q. So then, if I understood you correctly, in
22 your opinion claim 1 does not require that the

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