*Exhibit G*

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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

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 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
```

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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

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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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