

# EXHIBIT B

# Plaintiff's Infringement Contentions to Ford

Exhibit 941  
U.S. Patent No. 10,075,941  
Claims 8, 10, and 12-14

"8. A link adaptation method by a mobile station served by a serving base station in an Orthogonal Frequency Division Multiplexing (OFDM) communication system"

<p>8. A link adaptation method by a mobile station served by a serving base station in an Orthogonal Frequency Division Multiplexing (OFDM) communication system,:</p>	<p>To the extent the preamble is considered a limitation, Ford’s Accused Instrumentalities include vehicles equipped with cellular communication services made available thereupon for use and actually used in a wireless system standard starting at least at Release 8.</p> <p>Ford’s Accused Instrumentalities include vehicles equipped with cellular communication services made available thereupon for use and actually used in a wireless system standard starting at least at Release 8.</p> <p>For example, Ford offers for sale, sells, and/or imports various vehicle models with LTE cellular functionality and perform methods thereof, including but not limited to those disclosed in the Plaintiff’s Disclosure Of Asserted Claims And Infringement Contentions.</p> <p>The LTE specification (Series 36, Release 8) specifies user equipment (UE) information.</p> <p>For clarity, Release 8 of the 36 series 3GPP specifications was frozen in December 2009 and was used as the basis for the first wave of LTE equipment. The LTE market releases from Release 8 through Release 17. Though for ease of review Release 8 is cited below, the same or functionally identical content exists in each corresponding release.</p> <p>The LTE physical layer (PHY) uses different version of OFDM (Orthogonal Frequency Division Multiplexing) for the downlink and the uplink. For the uplink, LTE uses a single-carrier (Orthogonal Frequency Division Multiple Access) referred to as either discrete multi-carrier (DFTS)-OFDM or as SC-FDMA (Single Carrier – Frequency Division Multiplexing).</p> <p><b>4.2 General description of Layer 1</b></p> <p><b>4.2.1 Multiple Access</b></p> <p>The multiple access scheme for the LTE physical layer is based on Orthogonal Frequency Division Multiplexing (OFDM) with a cyclic prefix (CP) in the downlink, and on Single-Carrier Frequency Division Multiple Access (SC-FDMA) with a cyclic prefix in the uplink. To support transmission in paired and unpaired spectrum, two duplexing modes are supported: Frequency Division Duplex (FDD), supporting full duplex and half duplex operation, and Time Division Duplex (TDD).</p> <p>The Layer 1 is defined in a bandwidth agnostic way based on resource blocks, allowing the LTE system to support various spectrum allocations. A resource block spans either 12 sub-carriers with a sub-carrier bandwidth of 180 kHz or 6 sub-carriers with a sub-carrier bandwidth of 7.5 kHz each over a slot duration of 0.5 ms.</p>
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"8. A link adaptation method by a mobile station served by a serving base station in an Orthogonal Frequency Division Multiplexing communication system"

See e.g., 3GPP TS 36.201 V8.3.0 at pgs. 7-8.

LTE downlink transmissions use OFDM.

## 5.1 Downlink Transmission Scheme

### 5.1.1 Basic transmission scheme based on OFDM

The downlink transmission scheme is based on conventional OFDM using a cyclic prefix. The sub-carrier spacing is  $\Delta f = 15$  kHz. 12 consecutive sub-carriers during one slot correspond to one downlink resource block. In the frequency domain, the number of resource blocks,  $N_{RB}$ , can range from  $N_{RB-min} = 6$  to  $N_{RB-max} = 25$ .

In addition there is also a reduced sub-carrier spacing  $\Delta f_{low} = 7.5$  kHz, only for MBMS-dedicated channels.

In the case of 15 kHz sub-carrier spacing there are two cyclic-prefix lengths, corresponding to normal and extended cyclic prefix OFDM symbols per slot respectively.

- Normal cyclic prefix:  $T_{CP} = 160 \times T_s$  (OFDM symbol #0),  $T_{CP} = 144 \times T_s$  (OFDM symbol #1-11)

See e.g., 3GPP TS 36.300 V8.12.0 at pg. 25

LTE uplink transmissions use discrete Fourier transform spread OFDM (DFT-S-SS) as SC-FDMA (Single-Carrier Frequency Division Multiple Access).

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