

EXHIBIT D

Plaintiff's Infringement Contentions to Ford

Exhibit 302
U.S. Patent No. 10,771,302
Claims 1, 2, 4-7, 23, 24, and 26

"1. A communication method for a mobile device in an Orthogonal Frequency Division Multiplexing (OFDM) communication system, the method comprising:"

<p>1. A communication method for a mobile device in an Orthogonal Frequency Division Multiplexing (OFDM) communication system, the method comprising:</p>	<p>Ford's Accused Products include vehicles equipped with components and/or software that enable connectivity to 4G/LTE networks and services, including services sold by Ford.</p> <p>To the extent the preamble is considered a limitation, Ford's Accused Products do not infringe the patent. <i>E.g.</i>,</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 conforming to the standard starting at least at Release 8.</p> <p>For example, Ford offers for sale, sells, and/or imports various vehicle models equipped 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) supports user equipment (UE) transmission of a sounding signal (SRS) procedure.</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 includes 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>An LTE communication system has user equipment (UEs) transmit to and receive from a base station.</p>
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"1. A communication method for a mobile device in an Orthogonal Frequency Division Multiplexing (OFDM) communication system comprising:

4 Overall architecture

The E-UTRAN consists of eNBs, providing the E-UTRA user plane (PDCP/RLC/MAC/PHY) and protocol terminations towards the UE. The eNBs are interconnected with each other by means of the X2 interface. eNBs are also connected by means of the S1 interface to the EPC (Evolved Packet Core), more specifically to the MME (Mobility Management Entity) by means of the S1-MME and to the Serving Gateway (S-GW) by means of the S1-U. The S1 interface supports a many-to-many relation between MMEs / Serving Gateways and eNBs.

The E-UTRAN architecture is illustrated in Figure 4 below.

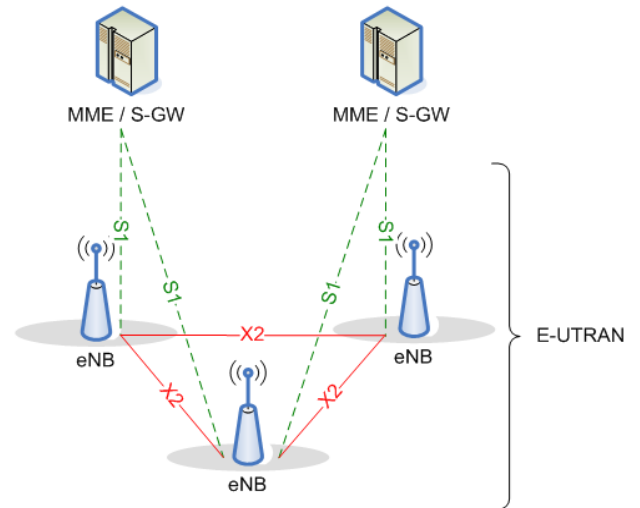


Figure 4-1: Overall Architecture

See e.g., 3GPP TS 36.300 V8.12.0 at pg. 15.

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