EXHIBIT H

Case 2:22-md-03034-TGB ECF No. 98-2, PageID.8105 Filed 11/14/22 Page 2 of 35 Case 6:21-cv-00024-ADA Document 45 Filed 11/18/21 Page 1 of 34

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

Neo Wireless LLC,

Plaintiff,

V.

C.A. NO. 6:21-cv-0024-ADA

Dell Technologies Inc. and Dell Inc.,

JURY TRIAL DEMANDED

Defendants.

PLAINTIFF NEO WIRELESS LLC'S RESPONSIVE CLAIM CONSTRUCTION BRIEF



TABLE OF CONTENTS

I.	IN	TRODUCTION	1
II.	A]	RGUMENT	1
	A.	Disputed Terms from U.S. Patent 8,467,366	1
		1. "the ranging signal is formed from a ranging sequence selected from a set of ranging sequences [associated with the cell] for identifying the mobile station".	1
		2. "exhibits a low peak-to-average power ratio in the time domain"	6
	B.	Disputed Terms from U.S. Patent No. 10,044,517	. 10
		1. Preambles	. 10
		"A method for a mobile device to receive data packets in an orthogonal frequency division multiple access (OFDMA) wireless communication system operating on multiple radio-frequency (RF) bands, the method comprising" – claim 1	. 10
		"A mobile device in an orthogonal frequency division multiple access (OFDMA) wireless communication system operating on multiple radio-frequency (RF) bands, the mobile device comprising:" – claim 13	. 10
		2. "receiving scheduling information from a serving base station, the scheduling information indicating an allocation of airlink resources in a first RF band and a second RF band"	. 12
		3. "receive scheduling information from a serving base station, the scheduling information indicating an allocation of airlink resources for receiving a first signal over a first RF band and a second signal over a second RF band"	. 12
		4. "allocation of airlink resources [] for receiving a first signal with a first frame structure having first frame boundaries and a second signal with a second frame structure having second frame boundaries"	. 15
		5. "traffic characteristics"	. 18
	C.	Disputed Terms from U.S. Patent No. 10,075,941	. 20
		1. "the antenna transmission scheme comprising a transmission diversity scheme or a multiple-input multiple output (MIMO) scheme"	. 20
		2. "the mobile station-specific transmission parameters indicate [] a corresponding subchannel configuration [] the corresponding subchannel configuration characterized by distributed subcarriers or localized subcarriers in the frequency domain"	7
	D.	Disputed Terms from U.S. Patent No. 10,447,450	. 25
		1. "the segment having a starting time-frequency coordinate"	. 25
	E.	Disputed Terms from U.S. Patent No. 10,833,908	. 27



Case 6:21-cv-00024-ADA Document 45 Filed 11/18/21 Page 3 of 34

	1. Preambles	27	
	"A mobile station comprising" – claims 1 and 21	27	
	"A method performed by a mobile station, the method comprising" - claim 11	27	
III	CONCLUSION	28	



TABLE OF AUTHORITIES

Cases

<i>Application of Gardner</i> 427 F.2d 786 (C.C.P.A. 1970)18
Baldwin Graphic Systems, Inc. v. Siebert
512 F.3d 1338 (Fed. Cir. 2008)
Braintree Laboratories, Inc. v. Novel Laboratories, Inc. 749 F.3d 1349 (Fed. Cir. 2014)
Catalina Mktg. Int'l, Inc. v. Coolsavings.com, Inc. 289 F.3d 801 (Fed. Cir. 2002)
Exmark Mfg. Co., Inc. v. Briggs & Stratton Pwr. Prods. Grp., LLC 879 F.3d 1332 (Fed. Cir. 2018)
Fractus, S.A. v. AT&T Mobility LLC 2019 WL 1641357 (E.D. Tex. Apr. 16, 2019)
General Elec. Co. v. Nintendo Co. 179 F.3d 1350 (Fed. Cir. 1999)11
Halliburton Energy Servs., Inc. v. M-I LLC 514 F.3d 1244 (Fed. Cir. 2008)
Home Diagnostics, Inc. v. LifeScan, Inc. 381 F.3d 1352 (Fed. Cir. 2004)
<i>i4i Ltd. P'ship v. Microsoft Corp.</i> 598 F.3d 8331 (Fed. Cir. 2010)
In re Varma 816 F.3d 1352 (Fed. Cir. 2016)
Info-Hold, Inc. v. Applied Media Techs. Corp. 783 F.3d 1262 (Fed. Cir. 2015)19
Interval Licensing LLC v. AOL, Inc. 766 F.3d 1364 (Fed. Cir. 2014)
Invitrogen Corp. v. Biocrest Mfg., L.P. 424 F.3d 1374 (Fed. Cir. 2005)



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

