

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

EVOLVED WIRELESS, LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 1:15-cv-00542-SLR
)	
APPLE INC.,)	
)	
Defendant.)	
EVOLVED WIRELESS, LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 1:15-cv-00543-SLR
)	
HTC CORPORATION and)	
HTC AMERICA, INC.,)	
)	
Defendants.)	
EVOLVED WIRELESS, LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 1:15-cv-00544-SLR
)	
LENOVO GROUP LTD.,)	
LENOVO (UNITED STATES) INC., and)	
MOTOROLA MOBILITY,)	
)	
Defendants.)	
EVOLVED WIRELESS, LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 1:15-cv-00545-SLR
)	
SAMSUNG ELECTRONICS CO., LTD.)	
and SAMSUNG ELECTRONICS)	
AMERICA, INC.,)	
)	
Defendants.)	
)	

EVOLVED WIRELESS, LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 1:15-cv-00546-SLR
)	
ZTE CORPORATION, ZTE (USA) INC.,)	
and ZTE SOLUTIONS INC.,)	
)	
Defendants.)	
)	

EVOLVED WIRELESS’S IDENTIFICATION OF CLAIM TERMS AND PROPOSED CONSTRUCTIONS

Pursuant to the Court’s Scheduling Order and as amended by agreement of the parties, Evolved Wireless identifies the following terms in the patents-in-suit in need of construction and the proposed constructions.

	'916 Patent Claim terms	Proposed construction
	All terms in the '916 Patent should be given their plain and ordinary meaning.	

	'965 Patent Claim terms	Proposed construction
	All terms in the '965 Patent should be given their plain and ordinary meaning.	

	'373 Patent Claim terms	Proposed construction
1.	“handover”	a process to transfer a telecommunication link by establishing radio connection with the target base station after radio connection with the source base station has ceased
2.	“target base station”	the base station to which the source base station determines the mobile terminal will be transferred
3.	Claim 17: “the measurement report is used to determine”	the measurement report is used by the source base station to determine

	'236 Patent Claim terms	Proposed construction
	All terms in the '236 Patent should be given their plain and ordinary meaning.	

	'481 Patent Claim terms	Proposed construction
	All terms in the '481 Patent should be given their plain and ordinary meaning.	

Discovery is at an early stage and expert discovery has not been completed. Evolved Wireless reserves the right to propose additional terms and amend its proposed constructions as the case moves forward and disputes or disagreements emerge between the parties, including from the claim terms and proposed constructions identified by the defendants in connection with the joint claim construction statement to be filed with the Court on May 17, 2016.

Dated: April 26, 2016

Respectfully submitted,

/s/ Ryan M. Schultz

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