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) C.A. No. 1.13-cv-00344-SLK
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.



Respectfully submitted,

/s/ Ryan M. Schultz.

FARNAN LLP Brian E. Farnan (Bar No. 4089) Michael J. Farnan (Bar No. 5165) 919 N. Market Street, 12th Floor Wilmington, Delaware 19801 (302) 777-0300 (302) 777-0301

bfarnan@farnanlaw.com

Christopher K. Larus (admitted *pro hac vice*) Ryan M. Schultz (admitted *pro hac vice*) Andrew D. Hedden (admitted *pro hac vice*) Benjamen C. Linden (admitted *pro hac vice*) Ryan E. Dornberger (admitted *pro hac vice*) Anthony F. Schlehuber (admitted *pro hac vice*) ROBINS KAPLAN LLP 800 LaSalle Avenue, Suite 2800 Minneapolis, Minnesota 55402 Telephone: (612) 349-8500 Facsimile: (612) 339-4181 clarus@robinskaplan.com rschultz@robinskaplan.com ahedden@robinskaplan.com blinden@robinskaplan.com rdornberger@robinskaplan.com

Andrea L. Gothing (admitted *pro hac vice*) ROBINS KAPLAN LLP 2440 W. El Camino Real, Suite 100 Mountain View, CA 94040 Telephone: (650) 784-4040 Facsimile: (650) 784-4041 agothing@robinskaplan.com

aschlehuber@robinskaplan.com

Counsel For Plaintiff Evolved Wireless, LLC

