IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

CELLULAR COMMUNICATIONS EQUIPMENT LLC,)
Plaintiff,)
v.)
AT&T, INC., ET AL.,)
Defendants.)
)

Case No. 2:15-cv-0576-RWS-RSP (Lead Case)

JURY TRIAL DEMANDED

PLAINTIFF'S P.R. 4-2 DISCLOSURES

Pursuant to the Court's Docket Control Order and Local Patent Rule 4-2, Plaintiff

provides the following preliminary proposed construction for each claim term identified by the

parties:

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U.S. Patent No. 8,457,022

Claim Term	Plaintiff's Proposed Construction
"detecting start of a system information message transmission window" / "detect start of a system information message transmission window" (claims 1 and 6)	Plain and ordinary meaning. No construction necessary.
"the predetermined subframes" (claims 1 and 6)	"the excluded uplink subframes and multi- cast subframes"
"continuous over adjacent radio frames" (claims 1 and 6)	Plain and ordinary meaning. No construction necessary.
"redundancy version signaling module configured to detect start of a system information message transmission window and to assign a redundancy version sequence	Not governed by 35 U.S.C. § 112(6). To the extent this limitation is determined to be governed by 35 U.S.C. § 112(6), the corresponding structure is: "software,

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at the start of the transmission window" (claim 6)	hardware, firmware, or a combination thereof,"
	performing the function of: detecting start of a system information message transmission window and assigning a redundancy version sequence at the start of the transmission window.

<u>U.S. Patent No. 8,570,957</u>

Claim Term	Plaintiff's Proposed Construction
"power headroom" (claims 1, 4, 7, and 10)	Plain and ordinary meaning.
	No construction necessary.
"radio network resources" (claims 4 and 10)	Plain and ordinary meaning.
	No construction necessary.
"subtracting the nominal maximum transmission power and the power that the apparatus would use if it did not apply maximum power limitations" (claims 1 and 7)	"subtracting the power that the apparatus would use if it did not apply maximum power limitations from the nominal maximum transmission power"
"as applicable" (claims 1, 4, 7, 10)	Plain and ordinary meaning.
	No construction necessary.
"when applicable" (claims 4, 10)	Plain and ordinary meaning.
	No construction necessary.

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U.S. Patent No. 8,867,472

Claim Term	Plaintiff's Proposed Construction
"aperiodic channel information" (claims 1, 14, 15, 27, 28, 41, 44, and 56)	Plain and ordinary meaning.
1 <i>5</i> , <i>21</i> , <i>2</i> 0, 41, 44, and <i>5</i> 0 <i>)</i>	No construction necessary.
"downlink component carrier" / "component carrier" (claims 1, 10, 11, 12, 15, 25, 26, 28, 44, 54, and 55)	Plain and ordinary meaning.
	No construction necessary.
"establish(ing) channel information with respect to the selected downlink component	Plain and ordinary meaning.
carrier" (claims 1 and 28.)	No construction necessary.
	Or, alternatively:
	"monitoring, evaluating, and/or collecting channel information with respect to the selected downlink component carrier"
"determin[e/ing] the selected downlink component [carrier] based on which component carrier of the plurality of component carriers carried the request" (claims 1 and 28)	Plain and ordinary meaning.
	No construction necessary.
	Or, alternatively:
	"identify[ing] the selected downlink component [carrier] based on which component carrier of the plurality of component carriers carried the request"
"the channel information" (claims 1, 10, 11,	Plain and ordinary meaning.
28, 26, 55)	No construction necessary.
	Or, alternatively:
	"the established channel information"

"on a component carrier for which the aperiodic channel information is provided"	Plain and ordinary meaning.
(claims 15 and 44)	No construction necessary. Or, alternatively:
	"on a component carrier for which the aperiodic channel information is to be provided"
"a processor configured to: determine the selected downlink component carrier based on	Not governed by 35 U.S.C. § 112(6).
which component carrier of the plurality of component carriers carried the request for providing the aperiodic channel information" (claim 1)	To the extent this limitation is determined to be governed by 35 U.S.C. § 112(6), the corresponding structure is: "a processor,"
	performing the function of: determining the selected downlink component carrier based on which component carrier of the plurality of component carriers carried the request for providing the aperiodic channel information.
"a processor configured to establish channel information with respect to the selected downlink component carrier" (claim 1)	Not governed by 35 U.S.C. § 112(6).
	To the extent this limitation is determined to be governed by 35 U.S.C. § 112(6), the corresponding structure is: "a processor,"
	performing the function of: establishing channel information with respect to the selected downlink component carrier.
"wherein the processor is configured to provide channel information for at least one of the other component carriers of the plurality of component carriers other than the selected downlink component carrier" (claim 10)	Not governed by 35 U.S.C. § 112(6).
	To the extent this limitation is determined to be governed by 35 U.S.C. § 112(6), the corresponding structure is: "a processor,"
	performing the function of: providing channel information for at least one of the other component carriers of the plurality of component carriers other than the selected downlink component carrier.

"a processor configured to generate a request for providing aperiodic channel information with respect to a selected downlink component carrier of a plurality of component carriers" (claim 15)	Not governed by 35 U.S.C. § 112(6). To the extent this limitation is determined to be governed by 35 U.S.C. § 112(6), the corresponding structure is: "a processor," performing the function of: generating a request for providing aperiodic channel information with respect to a selected downlink component carrier of a plurality of component carriers.
"wherein the processor is configured to generate a request for providing channel information for at least one of the other component carriers of the plurality of component carriers other than the selected component carrier" (claim 25)	Not governed by 35 U.S.C. § 112(6). To the extent this limitation is determined to be governed by 35 U.S.C. § 112(6), the corresponding structure is: "a processor," performing the function of: generating a request for providing channel information for at least one of the other component carriers of the plurality of component carriers other than the selected component carrier.
"wherein the processor is configured to include the request for providing the aperiodic channel information in an uplink grant" (claim 27)	Not governed by 35 U.S.C. § 112(6). To the extent this limitation is determined to be governed by 35 U.S.C. § 112(6), the corresponding structure is: "a processor," performing the function of: including the request for providing the aperiodic channel information in an uplink grant.

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