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19 BELL NORTHERN RESEARCH, LLC

20 **IN THE UNITED STATES DISTRICT COURT**
21 **SOUTHERN DISTRICT OF CALIFORNIA**

<p>22 BELL NORTHERN RESEARCH, 23 LLC, 24 25 Plaintiff, 26 27 v. 28 29 COOLPAD TECHNOLOGIES, INC. 30 AND YULONG COMPUTER 31 COMMUNICATIONS, 32 33 Defendants.</p>	<p>34 C.A. No. 3:18-cv-1783-CAB-BLM 35 36 PLAINTIFF’S OPPOSITION TO 37 DEFENDANTS’ JOINT MOTION 38 FOR SUMMARY JUDGMENT ON 39 INDEFINITENESS 40 41 Judge: Hon. Cathy Ann Bencivengo 42 Mag. Judge: Hon. Barbara L. Major 43 44 Hearing Date: June 19, 2019</p>
<p>45 BELL NORTHERN RESEARCH, 46 LLC, 47 48 Plaintiff, 49 50 v.</p>	<p>51 C.A. No. 3:18-cv-1784-CAB-BLM</p>

52 PLAINTIFF’S OPPOSITION TO DEFENDANTS’ JOINT MOTION FOR SUMMARY JUDGMENT
53 ON INDEFINITENESS

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<p>HUAWEI DEVICE (DONGGUAN) CO., LTD, HUAWEI DEVICE (SHENZHEN) CO., LTD., and HUAWEI DEVICE USA, INC.,</p> <p>Defendants.</p>	
<p>BELL NORTHERN RESEARCH, LLC,</p> <p>Plaintiff,</p> <p>v.</p> <p>KYOCERA CORPORATION and KYOCERA INTERNATIONAL INC.,</p> <p>Defendants.</p>	<p>C.A. No. 3:18-cv-1785-CAB-BLM</p>
<p>BELL NORTHERN RESEARCH, LLC,</p> <p>Plaintiff,</p> <p>v.</p> <p>ZTE CORPORATION, ZTE (USA) INC., ZTE (TX) INC.,</p> <p>Defendants.</p>	<p>C.A. No. 3:18-cv-1786-CAB-BLM</p>

PLAINTIFF’S OPPOSITION TO DEFENDANTS’ JOINT MOTION FOR SUMMARY JUDGMENT ON INDEFINITENESS

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3 I. GORIS PATENTS (’889 AND ’554 PATENTS) 1

4 A. “A mobile station...wherein the proximity sensor begins

5 detecting...substantially concurrently with the mobile station initiating an outgoing

6 wireless telephone call or receiving an incoming wireless telephone call.” (’889

7 Patent Claim 1.) 1

8 B. “substantially concurrently” (’889 Claim 1, 8; ’554 Claim 7, 13.) 2

9 II. ’842 PATENT 4

10 A. “a standard wireless networking configuration for an Orthogonal Frequency

11 Division Multiplexing scheme” 4

12 B. “extended long training sequence” 6

13 C. “optimal extended long training sequence” 8

14 D. “legacy wireless local area network device in accordance with a legacy

15 wireless networking protocol standard” 9

16 III. ’862 PATENT 9

17 A. The baseband processing module terms are not means-plus-function. 10

18 B. The specification discloses sufficient structure for the functions associated with

19 “a baseband processing module operable to . . .” term in Claim 9..... 12

20 1) “receive a preamble sequence carried by the baseband signal” 12

21 2) “estimate a channel response based upon the preamble sequence.” 14

22 3) “form a baseband signal . . .” 15

23 C. The specification discloses sufficient structure for the functions associated with

24 “a baseband processing module operable to . . .” term in Claim 10..... 15

25 1) “convert the...matrix (V) to polar coordinates” 16

26 IV. U.S. PATENT NO. 6,941,156..... 16

27 A. The “cell phone functionality” term in Claim 1 is not means-plus-function.... 16

28 B. The “RF functionality” term in Claim 1 is not means-plus-function. 18

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C. The “module to establish simultaneous communication paths . . .” term in Claim 1 is not means-plus-function and not indefinite. 19

D. The “automatic switchover module . . .” term in Claim 1 is not means-plus-function and not indefinite. 20

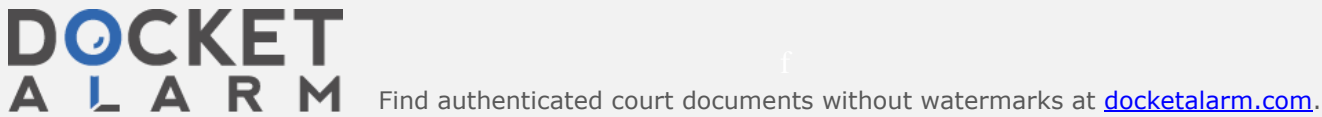


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