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9 Attorneys for Defendants Coolpad  
Technologies, Inc. and Yulong Computer  
10 Communications and Counterclaim Plaintiff  
Coolpad Technologies, Inc.

11 *[Counsel for co-defendants identified on*  
12 *signature page]*

13 **IN THE UNITED STATES DISTRICT COURT**  
14 **SOUTHERN DISTRICT OF CALIFORNIA**  
15

16 BELL NORTHERN RESEARCH,  
17 LLC,

18 Plaintiff,

19 v.

20 COOLPAD TECHNOLOGIES, INC.  
AND YULONG COMPUTER  
21 COMMUNICATIONS,

22 Defendants.

C.A. No. 3:18-cv-1783-CAB-BLM (lead  
case)

**DEFENDANTS' JOINT INVALIDITY  
CONTENTIONS**

Judge: Hon. Cathy Ann Bencivengo

23 BELL NORTHERN RESEARCH,  
24 LLC,

25 Plaintiff,

26 v.

27 HUAWEI DEVICE (DONGGUAN)  
CO., LTD, HUAWEI DEVICE  
28 (SHENZHEN) CO., LTD., and  
HUAWEI DEVICE USA, INC.,

C.A. No. 3:18-cv-1784-CAB-BLM

**DEFENDANTS' JOINT INVALIDITY  
CONTENTIONS**

Judge: Hon. Cathy Ann Bencivengo

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Defendants.

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BELL NORTHERN RESEARCH,  
LLC,

Plaintiff,

v.

KYOCERA CORPORATION and  
KYOCERA INTERNATIONAL INC.,

Defendants.

C.A. No. 3:18-cv-1785-CAB-BLM  
**DEFENDANTS' JOINT INVALIDITY  
CONTENTIONS**

Judge: Hon. Cathy Ann Bencivengo

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BELL NORTHERN RESEARCH,  
LLC,

Plaintiff,

v.

ZTE CORPORATION,  
ZTE (USA) INC., and  
ZTE (TX) INC.,

Defendants.

C.A. No. 3:18-cv-1786-CAB-BLM  
**DEFENDANT'S JOINT INVALIDITY  
CONTENTIONS**

Judge: Hon. Cathy Ann Bencivengo

1 Pursuant to S.D. Cal. Patent Local Rules 3.3 and 3.4, and the Rules and Orders  
2 of this Court, Defendants Coolpad Technologies, Inc., Yulong Computer  
3 Communications, Huawei Device (Dongguan) Co., Ltd., Huawei Device (Shenzhen)  
4 Co., Ltd., Huawei Device USA, Inc., Kyocera Corporation, Kyocera International Inc.,  
5 ZTE Corporation, ZTE (USA) Inc., and ZTE (TX) Inc. (collectively, “Defendants”)  
6 hereby serve their Joint Invalidity Contentions (“Invalidity Contentions”) on Plaintiff  
7 Bell Northern Research, LLC (“BNR”) in support of their allegations of invalidity of  
8 United States Patent Nos. 7,319,889 (“889 Patent”); 8,204,554 (“554 Patent”);  
9 7,990,842 (“842 Patent”); 8,416,862 (“862 Patent”); 7,957,450 (“450 Patent”);  
10 6,941,156 (“156 Patent”); 8,792,432 (“432 Patent”); and 7,039,435 (“435 Patent”)  
11 (collectively, the “Asserted Patents”). While all of the claims collectively asserted  
12 against the Defendants are addressed below, each Defendant hereby submits these  
13 Contentions only with respect to the patents and claims that BNR has asserted against  
14 each such Defendant.

## 15 **I. INTRODUCTION AND RESERVATION OF RIGHTS**

16 These Invalidity Contentions are based on information currently available to  
17 Defendants. Defendants’ investigation and analysis of prior art is ongoing, and they  
18 reserve the right to supplement or modify these Invalidity Contentions in a manner  
19 consistent with the Federal Rules of Civil Procedure and the Court’s rules.

20 Defendants’ Invalidity Contentions do not constitute an admission that any  
21 current, past, or future version of the accused products infringe the Asserted Patents  
22 either literally or under the doctrine of equivalents. Unless otherwise stated,  
23 Defendants have relied on the broad claim constructions of the asserted claims that  
24 BNR has implicitly adopted in its Disclosure of Asserted Claims and Infringement  
25 Contentions (“Infringement Contentions”), to the extent any construction can be  
26 inferred from BNR’s Infringement Contentions. Such reliance should not be taken to  
27 mean that Defendants understand, or are adopting or agreeing with, BNR’s apparent  
28 constructions. Defendants expressly do not do so and reserve their right to contest

1	229. "CR's to TS 34.123-1 v5.3.0 Related to RRC Package 1 and 2 Test Cases," Technical Specification Group Terminals TSGT#20(03)0101, Meeting #20, Hämeenlinna, Finland, 4.	June 6, 2003
2		
3	230. Fodor et al., "Chapter 4 – Architecture and Protocol Support for Radio Resource Management (RRM)," Taylor & Francis Group LLC	2009
4		
5	231. Mino et al., "Identification and Definition of Cooperation Schemes between RANs - First Draft."	2004
6		
7	232. European Patent Application Publication No. EP 1 720 373 A1 ("Jeong II")	November 8, 2006
8		
9	233. Nokia Corporation, "Addition of Optimised RACH Message Types," 3GPP TSG RAN WG2 Meeting #71, R2-104524, Madrid, Spain, Aug. 23-27, 2010.	August 23-27, 2010
10		
11	234. Nokia Corporation, Nokia Siemens Networks, "Analysis on RACH Signalling," 3GPP TSG RAN WG2 Meeting #71 bis, R2-105713, Xian, China, Oct. 11-15, 2010.	October 11-15, 2010
12		
13	235. "3rd Generation Partnership Project; Technical Specification Group Radio Access Network; Radio Resource Control (RRC); Protocol specification (Release 10)", 3GPP TS 25.331 V10.2.0.	December 2010
14		
15	236. Nokia Corporation, "RACH Signalling Optimisation Considerations," 3GPP TSG RAN WG2 Meeting #72 bis, R2-110304, Dublin, Ireland, Jan. 17-21, 2011.	January 17-21, 2011

#### H. Prior Art References for the '435 Patent

Pursuant to Patent L.R. 3.3, the tables below identify the prior art items that Defendants presently assert anticipate and/or render obvious the asserted claims of the '435 Patent. Where applicable, this includes information about any alleged knowledge of use of the invention in this country prior to the date of invention of the '435 Patent.

U.S. Patents or Patent Publications		Date of Issue or Publication
237.	U.S. Patent No. 5,541,609 ("Stutzman")	July 30, 1996
238.	U.S. Patent No. 6,018,646 ("Myllymaki")	January 25, 2000 (filed August 22, 1997)

<b>Other Printed Publications</b>	<b>Date of Publication</b>
239. International Application Publication No. WO 95/03549 (“Carter”)	February 2, 1995
240. International Application Publication No. WO 02/05443 A2 (“Irvin”)	January 17, 2002 (filed June 20, 2001, designating the U.S., claiming priority to U.S. Patent Application No. 09/612,034 filed July 7, 2000)
241. European Patent Application Publication No. EP 1 091 498 A1 (“Baiker”)	April 11, 2001

<b>Prior Art Systems or Offers for Sale</b>	<b>Using or Offering Party</b>	<b>Date of Use or Offer for Sale</b>
242. Admitted Prior Art Devices and Systems of the ‘435 Patent (“‘435 APA”)	Various	By Sept. 28, 2001

In addition to the above prior art references, Defendants identify the following patents, printed publications, product literature, and other materials that are pertinent to invalidity of the asserted claims. Defendants may rely on these references as invalidating prior art, evidence of the knowledge of those skilled in the art, and/or evidence to support a motivation to combine or modify other prior art. Defendants reserve all rights to supplement or modify these invalidity contentions and to rely on these references to prove invalidity of the asserted claims in a manner consistent with the Federal Rules of Civil Procedure and the Rules of this Court.

<b>Additional Prior Art References</b>	<b>Date of Issue or Publication</b>
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