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Attorneys for Plaintiff
BELL NORTHERN RESEARCH, LLC

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

<p>BELL NORTHERN RESEARCH, LLC,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>COOLPAD TECHNOLOGIES, INC. AND YULONG COMPUTER COMMUNICATIONS,</p> <p style="text-align: center;">Defendants.</p>	<p>C.A. No. 3:18-cv-1783-CAB-BLM</p> <p>JOINT CLAIM CONSTRUCTION CHART, WORKSHEET, AND HEARING STATEMENT PURSUANT TO P.L.R. 4.2</p> <p>Judge: Hon. Cathy Ann Bencivengo</p> <p>Magistrate Judge: Barbara Lynn Major</p>
<p>BELL NORTHERN RESEARCH, LLC,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p>	<p>C.A. No. 3:18-cv-1784-CAB-BLM</p>

Joint Claim Construction Chart

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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>

Pursuant to this Court’s Case Management Order of October 23, 2018, and Patent Local Rule 4.2, counsel for Plaintiff Bell Northern Research, LLC (“BNR”) and Defendants Coolpad Technologies, Inc.; Yulong Computer Communications; Huawei Device (Dongguan) Co., Ltd.; Huawei Device (Shenzhen) Co., Ltd.; Huawei Device USA, Inc.; Kyocera Corporation; Kyocera International, Inc.; ZTE Corporation; ZTE (USA) Inc.; and ZTE (TX) Inc. (collectively, “Defendants”) submit this Joint Hearing Statement, the attached Appendix A, Joint Claim Construction Worksheet, and the attached Appendix B, Joint Claim Construction Chart. The patents-in-suit are: 7,319,889; 8,204,554; 7,990,842; 8,416,862; 7,957,450; 6,941,156; 8,792,432; and 7,039,435.

The parties exchanged their preliminary claim constructions on March 22, 2019 and their responsive claim constructions on April 5, 2019. Pursuant to Patent L.R. 4.1.e, conferences were held on April 15 and April 18, 2019, and all parties participated.

JOINT HEARING STATEMENT

A. MOST SIGNIFICANT TERMS

In accordance with Patent L.R. 4.2(a), the parties hereby identify the terms whose construction will be most significant to the resolution of the case up to a maximum of ten (10) terms:

No.	Claim Nos.	Claim Term (U.S. Patent No. 8,416,862)
1	9	“decompose the estimated transmitter beamforming unitary matrix (V) to produce the transmitter beamforming information”
2	9	“...a baseband processing module operable to: receive a preamble sequence carried by the baseband signal; estimate a channel response based upon the preamble sequence;

Joint Claim Construction Chart

		determine an estimated transmitter beamforming unitary matrix (V) based upon the channel response and a receiver beamforming unitary matrix (U); decompose the estimated transmitter beamforming unitary matrix (V) to produce the transmitter beamforming information; and form a baseband signal employed by the plurality of RF components to wirelessly send the transmitter beamforming information to the transmitting wireless device.”
No.	Claim Nos.	Claim Term (U.S. Patent No. 7,957,450)
3	1, 2, 3, 11, 12, 13, 21, 22	“channel estimate matrices” “matrix based on the/said plurality of channel estimates”
4	1, 11, 21, 22	“coefficients derived from performing a singular value matrix decomposition (SVD)” “coefficients from performing a singular value matrix decomposition (SVD)”
No.	Claim Nos.	Claim Term (U.S. Patent No. 6,941,156)
5	1	“cell phone functionality”
6	1	“RF communication functionality”
7	1	“a module to establish simultaneous communication paths from said multimode cell phone using both said cell phone functionality and said RF communication functionality”
8	1	“an automatic switch over module, in communication with both said cell phone functionality and said RF communication functionality, operable to switch a communication path established on one of said cell phone functionality and said RF communication functionality, with another communication path later established on the other of said cell phone functionality and said RF communication functionality”

1. Plaintiff’s Additional “Most Significant” Term:

Plaintiff identifies the following additional claim term as being “most significant” under Patent L.R. 4.2(a):

No.	Claim Nos.	Claim Term (U.S. Patent No. 8,416,862)
9	10	“produce the estimated transmitter beamforming unitary matrix (V) in Cartesian coordinates; and convert the estimated transmitter beamforming unitary matrix (V) to polar coordinates”

2. Defendants’ Additional “Most Significant” Term:

No.	Claim Nos.	Claim Term (U.S. Patent No. 6,941,156)
10	1	“simultaneous communication paths from said multimode cell phone”

3. Plaintiff’s Response to Defendants’ Statement:

Plaintiff has proposed 4 terms for constructions. Defendants have proposed 14 terms for construction or a determination that 112(6) applies. The Court allotted the parties 15 terms jointly for proposed terms. While the Court indicated it would entertain an enlargement of that limit, the Defendants have failed to articulate any valid reason for such an enlargement, and were unable to do so during the parties’ meet and confer. During the parties’ meet and confer, Defendants’ counsel stated that they were “not concerned” with exceeding the Court’s limit. Plaintiffs object to this disregard of the Court’s order.

Moreover, Defendants’ Statement mischaracterizes Plaintiff’s position on the allegedly “indefinite terms.” Defendants apparently intend to argue that 12 terms are indefinite. Of those terms, Defendants also argue that six of them are subject to 112(6) but indefinite for lack of structure. As is required by the local rules, Plaintiff has proposed constructions for any of those terms (3 total) for which it may request construction in response to the Defendants’ arguments, while reserving the right to argue that they are not indefinite. Of the 112(6) arguments, Plaintiff has proposed an alternative function and structure for 4 terms to rebut Defendants’ indefiniteness argument. For the 5 remaining terms that Defendants allege are indefinite, Plaintiff has

Joint Construction Construction

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