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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 <b>PLAINTIFF’S OPPOSITION TO 37 DEFENDANTS’ JOINT MOTION 38 FOR SUMMARY JUDGMENT ON 39 INDEFINITENESS</b> 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

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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>

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

    A. “A mobile station...wherein the proximity sensor begins detecting...substantially concurrently with the mobile station initiating an outgoing wireless telephone call or receiving an incoming wireless telephone call.” (’889 Patent Claim 1.) ..... 1

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

II. ’842 PATENT ..... 4

    A. “a standard wireless networking configuration for an Orthogonal Frequency Division Multiplexing scheme” ..... 4

    B. “extended long training sequence” ..... 6

    C. “optimal extended long training sequence” ..... 8

    D. “legacy wireless local area network device in accordance with a legacy wireless networking protocol standard” ..... 9

III. ’862 PATENT ..... 9

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

    B. The specification discloses sufficient structure for the functions associated with “a baseband processing module operable to . . .” term in Claim 9..... 12

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

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

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

    C. The specification discloses sufficient structure for the functions associated with “a baseband processing module operable to . . .” term in Claim 10..... 15

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

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

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

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



1 C. The “module to establish simultaneous communication paths . . .” term in  
2 Claim 1 is not means-plus-function and not indefinite. .... 19  
3 D. The “automatic switchover module . . .” term in Claim 1 is not means-plus-  
4 function and not indefinite. .... 20  
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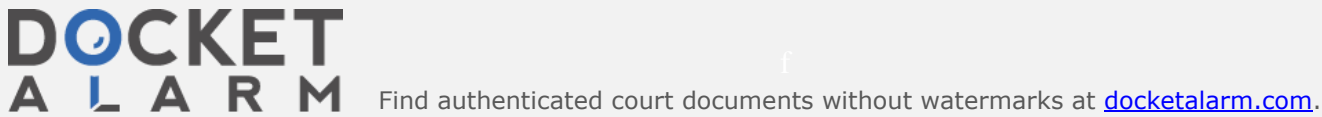


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