

EXHIBIT M

1
2 **IN THE UNITED STATES DISTRICT COURT**
3 **SOUTHERN DISTRICT OF CALIFORNIA**

4 BELL NORTHERN RESEARCH, 5 LLC, 6 7 Plaintiff, 8 9 v. 10 11 COOLPAD TECHNOLOGIES, INC. 12 AND YULONG COMPUTER 13 COMMUNICATIONS, 14 15 Defendants.	C.A. No. 3:18-cv-1783-CAB-BLM Judge: Hon. Cathy Ann Bencivengo Magistrate Judge: Hon. Barbara L. Major
12 BELL NORTHERN RESEARCH, 13 LLC, 14 15 Plaintiff, 16 17 v. 18 19 HUAWEI DEVICE (DONGGUAN) 20 CO., LTD, HUAWEI DEVICE 21 (SHENZHEN) CO., LTD., and 22 HUAWEI DEVICE USA, INC., 23 24 Defendants.	C.A. No. 3:18-cv-1784-CAB-BLM
21 BELL NORTHERN RESEARCH, 22 LLC, 23 24 Plaintiff, 25 26 v. 27 28 KYOCERA CORPORATION and KYOCERA INTERNATIONAL INC., Defendants.	C.A. No. 3:18-cv-1785-CAB-BLM

REBUTTAL DECLARATION OF DR. VIJAY K. MADISETTI IN SUPPORT OF

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**REBUTTAL DECLARATION OF DR. VIJAY K. MADISETTI, PH.D.
IN SUPPORT OF PLAINTIFF'S CLAIM CONSTRUCTIONS**

REBUTTAL DECLARATION OF DR. VIJAY K. MADISETTI IN SUPPORT OF

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Introduction 1

U.S. Patent No. 6,941,156 1

 A. Opinions Regarding the Min Declaration 1

 B. Opinions Regarding the Wells Declaration 2

 C. “simultaneous communication paths from said multimode cell phone” 2

 D. “cell phone functionality” 5

 E. “RF functionality” 7

 F. “a module to establish simultaneous communication paths from said multimode cell phone using both said cell phone functionality and said RF communication functionality” 9

 G. “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” 11

U.S. Patent No. 8,416,862 15

 A. Opinions Regarding the Min Declaration 15

 B. “decompose the estimated transmitter beamforming unitary matrix (V) to produce the transmitter beamforming information” 15

 C. “a baseband processing module operable to: receive a preamble sequence carried by the baseband signal; estimate a channel response based upon the preamble sequence; 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” 17

 D. “the baseband processing module is operable to: produce the estimated transmitter beamforming unitary matrix (V) in Cartesian coordinates; and convert the estimated transmitter beamforming unitary matrix (V) to polar coordinates” 21

U.S. Patent No. 7,957,450 23

 A. “channel estimate matrices” / “matrix based on the plurality of channel estimates” 24

 B. “coefficients derived from performing a singular value matrix decomposition (SVD)” 27

U.S. Patent No. 7,990,842 28

 A. “standard wireless networking configuration for an Orthogonal Frequency Division Multiplexing scheme” 28

 B. “a legacy wireless local area network device in accordance with a legacy wireless networking protocol standard” 31

 C. “extended long training sequence” 33

REBUTTAL DECLARATION OF DR. VIJAY K. MADISETTI IN SUPPORT OF

D. “optimal extended long training sequence”34

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