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VOLKSWAGEN GROUP OF AMERICA, INC.,
FORD MOTOR COMPANY, GENERAL MOTORS LLC,
NISSAN NORTH AMERICA, INC., TESLA, INC., and
AMERICAN HONDA MOTOR CO., INC.,[1]
Petitioner

v.

NEO WIRELESS, LLC,
Patent Owner

Case IPR2022-01539
U.S. Patent No. 10,965,512

PETITIONER VOLKSWAGEN GROUP OF AMERICA, INC.'S REPLY TO PATENT OWNER'S RESPONSE

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[1] Ford Motor Company filed a motion for joinder and a petition in IPR2023-00764, and General Motors LLC, Nissan North America, Inc., Tesla, Inc., and American Honda Motor Co., Inc., filed their own motion for joinder and petition in IPR2023-00961. Both motions were granted, and, therefore, Ford Motor Company, General Motors LLC, Nissan North America, Inc., Tesla, Inc., and American Honda Motor Co., Inc., have been joined as petitioners in this proceeding.

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PETITIONER'S UPDATED EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 10,965,512 to Li et al. ("'512 patent")
1002	'512 Patent Prosecution History
1003	Declaration of Dr. Paul Min
1004	International Patent Publication No. WO2004/049618 to Kim et al. ("Kim")
1005	U.S. Patent No. 7,120,395 to Tong et al. ("Tong")
1006	U.S. Patent Application Pub. No. 2004/0179627 to Ketchum et al. ("Ketchum")
1007	U.S. Patent Application Pub. No. 2002/0163879 to Li et al. ("Li")
1008	U.S. Patent No. 7,248,559 to Ma et al. ("Ma '559")
1009	Tufvesson, et al., *Pilot Assisted Channel Estimation For OFDM in Mobile Cellular Systems*, IEEE 47th Vehicular Technology Conference (1997)
1010	U.S. Patent No. 7,826,471 to Wilson et al. ("Wilson")
1011	U.S. Patent No. 7,664,533 to Logothetis et al. ("Logothetis")
1012	U.S. Patent No. 7,054,664 to Nagaraj ("Nagaraj")
1013	International Patent Application No. WO 2004/056022 to Lee et al. ("Lee")
1014	U.S. Patent No. 7,551,546 to Ma ("Ma '546")
1015	Anderson, *Fixed Broadband Wireless System Design*, Wiley (2003) (excerpts)
1016	U.S. Patent No. 7,852,746 to Jalali ("Jalali").
1017	U.S. Patent Application Pub. No. 2004/0131007 to Smee et al. ("Smee")
1018	U.S. Patent No. 7,650,152 to Li et al. ("Li '152").
1019	U.S. Patent Application Pub. No. 2004/0190598 to Seki et al. ("Seki").

Exhibit No.	Description
1020	Li, "*A Novel Broadband Wireless OFDMA Scheme for Downlink in Cellular Communications*," Samsung Advanced Institute of Technology (IEEE) (2003) ("Li-Samsung")
1021	Hara et al., "*Multicarrier Techniques for 4G Mobile Communications*," Artech House (2003) (excerpts) ("Hara")
1022	U.S. Patent Application Pub. No. 2004/0228270 to Chen et al. ("Chen")
1023	Van Nee et al., "OFDM for Wireless Multimedia Communications," Artech House (2000) ("Van Nee") (excerpts)
1024	Bahai et al., "*Multi-Carrier Communications Theory and Applications of OFDM*," Springer Science (2004) (excerpts) ("Bahai")
1025	U.S. Patent No. 7,039,001 to Krishnan et al. (Krishnan")
1026	U.S. Patent No. 6,992,621 to Casas et al. ("Casas")
1027	U.S. Patent No. 5,596,329 to Searle et al. ("Searle")
1028	U.S. Patent Application Pub. No. 2005/0075125 to Bada et al. ("Bada").
1029	*Curriculum Vitae* of Dr. Paul Min
1030	U.S. Provisional Patent Application No. 60/421,309 to Walton et al. ("'309 Provisional")
1031	U.S. Patent No. 7,012,882 to Wang et al. ("Wang")
1032	Transfer Order, *In re: Neo Wireless, LLC, Patent Litigation*, Case MDL No. 3034, issued June 14, 2022 (ECF No. 50)
1033	Docket Sheet, *Neo Wireless, LLC v. Volkswagen Group of America, Inc.*, Case No. 2:22-cv-11404 (E.D. Mich.)
1034	United States District Courts – National Judicial Caseload Profile, June 2022
1035	U.S. Patent No. 8,934,473 to Li *et al.*
1036	U.S. Patent No. 8,432,891 to Li *et al.*
1037	U.S. Patent No. 11,388,034 to Li *et al.*

Exhibit No.	Description
1038	Kim et al., "Synchronization and Cell-Search Technique Using Preamble for OFDM Cellular Systems," IEEE Transactions on Vehicular Technology, Vo. 56, No. 6, November 2007
1039	Kim et al., "A Preamble-Based Cell Searching Technique for OFDM Cellular Systems," IEEE, 2003
1040	U.S. Patent No. 9,749,168 to Li *et al.*
1041	Declaration of William Alberth in Support of Neo Wireless's Opening Claim Construction Brief, *In re Neo Wireless, LLC Patent Litigation*, Case No. 2:22-md-03034-TGB (E.D. Mich.), filed February 16, 2023
1042	Transcript of October 30, 2023 Deposition of William P. Alberth, Jr.
1043	Ifeachor *et al.*, *Digital Signal Processing: A Practical Approach*, Second Edition, Prentice Hall, 2002 (excerpts)
1044	Declaration of Dr. Paul Min in Support of Petitioner's Reply
1045	Transcript of October 19, 2023 Deposition of William P. Alberth, Jr. in IPR2022-01537

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