

EXHIBIT F

NXP – INFRINGEMENT CLAIM CHART – U.S. PATENT NO. 7,564,914

Bell Northern Research (“BNR”) provides evidence of infringement of exemplary claims 13–14, 17, and 21–22 of U.S. Patent No. 7,564,914 (“the ’914 patent”) by the NXP 88W8997 2.4/5 GHz Dual-Band 2x2 Wi-Fi 5 (802.11ac) + Bluetooth (LE) (“88W8997”) produced by NXP. These claim charts demonstrate infringement by comparing each element of the claimed invention to corresponding components, aspects, and/or features of the Accused Products. These claim charts are not intended to constitute a report on infringement. These claim charts include information provided by way of example, and not by way of limitation.

The information in this chart is exemplary, based only upon information from available resources, and is only BNR’s present theory (or theories) of infringement as of the date of service. BNR provides these infringement analyses based on information obtained from Respondent. BNR expects that Respondent and/or third parties will produce additional information regarding the Respondent’s products and processes beyond that which is presently publicly available. Accordingly, BNR reserves the right to supplement this infringement analysis once such information is made available to BNR. Furthermore, BNR reserves the right to supplement this infringement analysis, as appropriate, upon issuance of a court order construing any terms recited in the asserted claims.

The Accused Processes, identified below, are performed using one or more one or more wireless communication devices that practice the claimed methods described below. The Accused Products include NXP products that practice 802.11ac and Bluetooth (LE) and include, but are not limited to the NXP 88Q9098, 88Q9098S, 88W8801, 88W8887, 88W8897, 88W8897P, 88W8987, 88W8987S, 88W9054, 88W9098, AW690, CW641, IW416, IW612, and IW620 products. One such product is charted below.

Unless otherwise noted, BNR contends that NXP and customers of NXP directly infringe under 35 U.S.C. § 271(a) by using the methods claimed below within the United States. In particular, on information and belief, NXP at least directly infringes § 271(a) by testing of its Accused Products within the United States and NXP’s customers and their end users infringe § 271(a) by using the Accused Products to communicate over wireless networks using the 802.11ac standard and backwards-compatible standards, which testing and use practice the methods in accordance with the 802.11ac standard as described below.

In addition, BNR contends that NXP induces its customers and their end users to infringe pursuant to 35 U.S.C. § 271(b). BNR contends that NXP contributes to infringement by offering to sell within the United States, selling within the United States, or importing into the United States an apparatus for use in practicing the ’914 Patented Processes under 35 U.S.C. § 271(c). The apparatus forms a material part of the invention (lacking only external antennas), and the Accused Processes are especially adapted for practicing the invention. BNR contends that NXP induces infringement of the ’914 patent by practicing 802.11ac or subsequent backwards-compatible wireless networking standards and selling articles of commerce suitable for substantial non-infringing use.

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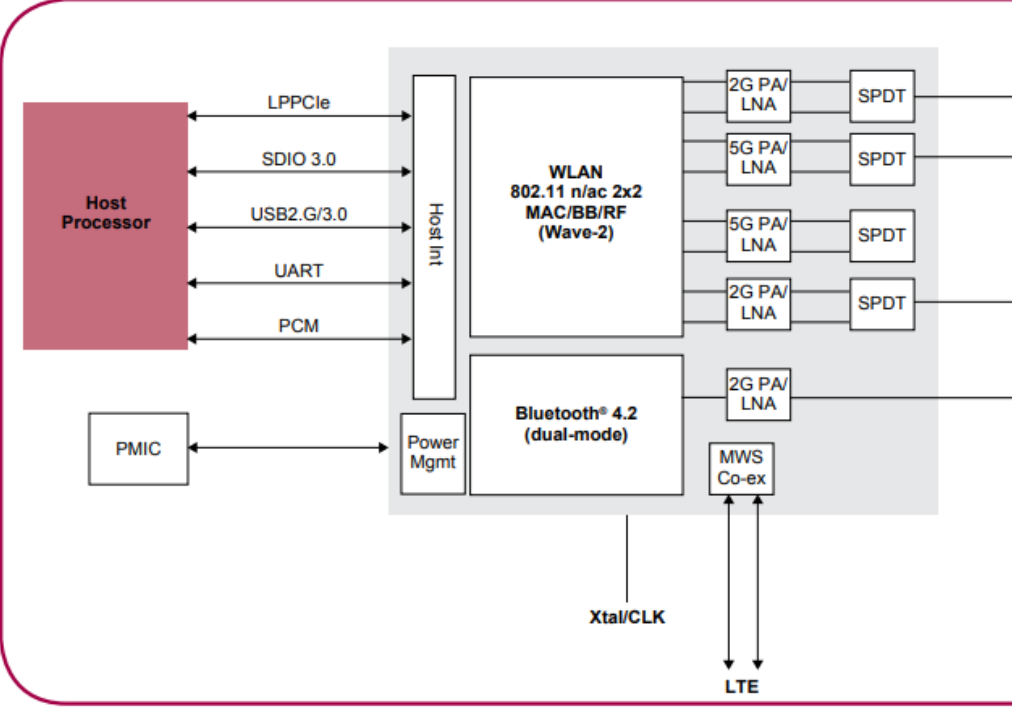
Unless otherwise noted, BNR believes and contends that each element of each claim asserted herein is literal testing of the Accused Products. However, to the extent that NXP attempts to allege that any asserted claim element is not literally met by the Accused Products, BNR believes and contends that such elements are met under the doctrine of equivalents. More specifically, in its analysis of the Accused Products, BNR did not identify any substantial differences between the elements of the asserted claims and the corresponding features of the Accused Products, as set forth herein. In each instance, the identified step of the process was performed by the Accused Products for at least substantially the same function in substantially the same way to achieve the same result as the corresponding claim element.

To the extent the chart of an asserted claim relies on evidence about certain specifically-identified Accused Products, BNR reserves the right to amend this infringement analysis based on other products made, used, sold, imported, or offered for sale by NXP. BNR reserves the right to amend this infringement analysis by adding, subtracting, or otherwise modifying content in the Exemplar Charts in each chart.

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U.S. Patent No. 7,564,914	Exemplary Evidence of Plaintiff’s Theory(ies) of Infringement for the Accu
<u>Claim 13</u>	
<p>[pre] 13. A method for communicating information in a communication system, the method comprising:</p>	<p>To the extent that the preamble is a limitation, NXP makes, uses, sells, offers, or otherwise performs a method for communicating information in a communication system, the method comprising:</p> <p>PRODUCT OVERVIEW</p> <p>The NXP 88W8997 SoC is the industry’s first 28 nm, 802.11ac (Wave-2), 2 x 2 MU-MIMO combo solution with support for Bluetooth 5.1. The design enhancements and the low-power 28 nm process technology reduce the power consumption by up to 40% over existing solutions. This SoC features the highest level of integration in the market, including dual-band power amplifiers (PAs), low-noise amplifiers (LNAs) and switches, reducing the board-level bill of materials to the bare minimum and enabling easy chip-on-board and module design for board markets.</p>

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U.S. Patent No. 7,564,914	Exemplary Evidence of Plaintiff's Theory(ies) of Infringement for the Accu
	<p>88W8997 BLOCK DIAGRAM</p>  <p>The diagram illustrates the internal architecture of the 88W8997 chip. On the left, a red box represents the Host Processor, which is connected to the chip via a Host Interface (Host Int) block. Bidirectional connections include LPPCie, SDIO 3.0, USB2.G/3.0, UART, and PCM. Below the Host Processor is a PMIC (Power Management IC) connected to a Power Mgmt block within the chip. The central part of the chip contains a WLAN 802.11 n/ac 2x2 MAC/BB/RF (Wave-2) block and a Bluetooth® 4.2 (dual-mode) block. The WLAN block is connected to four antenna paths, each consisting of a PA/LNA (2G or 5G) and an SPDT switch. The Bluetooth block is connected to a 2G PA/LNA and an MWS Co-ex block. The MWS Co-ex block is connected to an LTE antenna. A common Xtal/CLK line is connected to both the WLAN and Bluetooth blocks.</p> <p>https://www.nxp.com/docs/en/fact-sheet/88W8997-FACT-SHEET.pdf</p>

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