

EXHIBIT 12

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

OZMO LICENSING LLC,	§	
	§	
Plaintiff,	§	Case No. 6:22-cv-00642-ADA
v.	§	
	§	
DELL TECHNOLOGIES INC. and	§	
DELL INC.,	§	
	§	
Defendants.	§	

DEFENDANTS’ PROPOSED CLAIM CONSTRUCTIONS

Pursuant to the Scheduling Order (D.I. 24), Defendants Dell Technologies Inc. and Dell Inc. (collectively “Dell”) identify the following extrinsic evidence relating to the terms proposed for construction for U.S Patent Nos. 9,264,991 (“991 patent); 10,873,906 (“906 patent); 8,599,814 (“814 patent); 11,012,934 (“934 patent); 11,122,504 (“504 patent”); and 11,252,659 (“659 patent”) (collectively, the “Asserted Patents”).

Dell identifies the extrinsic evidence below in support of its positions and in response to those of Plaintiff Ozumo Licensing LLC, as best as they are understood at this time. This list is based on information currently available to Dell. Dell has not received Plaintiff’s extrinsic evidence, including any testimony supplied by its expert in support of its briefing. Dell therefore reserves the right to revise, amend, supplement, or subtract from this list of extrinsic evidence based on further discovery, Plaintiff’s extrinsic evidence, or to the extent the disputes and/or terms or issues change. Nothing in this submission shall be construed as an admission by Dell.

Where applicable, Dell has identified the expert witness who will offer opinion testimony in support of Dell’s constructions. Dell reserves the right to rely on and respond to any expert testimony relied on or offered by Plaintiff. Dell reserves the right to offer and rely on rebuttal expert testimony to respond to any expert testimony relied on or offered by Plaintiff. Dell reserves

the right to respond to and/or rely on the level of skill of a person of ordinary skill in the art as identified by Plaintiff.

Dell's proposed constructions for the proposed terms are as follows:

No.	Claim Term	Defendants' Construction	Extrinsic Evidence
1.	<p>WPAN (Defendants)</p> <ul style="list-style-type: none"> • wireless personal area network (“WPAN”) – ‘814 patent, claim 5 • wireless personal area network (“WPAN”) – ‘991 patent, claims 11-12, 19-20 • wireless personal area network (WPAN) – ‘934 and ‘504 patent, all claims • WPAN – ‘659 patent, all claims • wireless personal area network (“WPAN”) – ‘906 patent, all claims <p>Personal Area Network (Plaintiff)</p> <ul style="list-style-type: none"> • All patents 	a wireless network with a typical coverage range on the order of 30 feet	<p>Minal Mishra <i>et al.</i>, “Wireless Multimedia Personal Area Networks: An Overview”, <i>Emerging Wireless Multimedia: Services and Technologies</i> (2005) (DELL-OZMO-1-026020): including Section 6.1.</p> <p>Newton Telecom Dictionary (22nd ed. 2006) (defining “WPAN”, “Wireless Personal Area Network”, and “Wireless”) (DELL-OZMO-1-026608).</p> <p>Webster’s New World Computer Dictionary (10th ed. 2003) (defining “Personal Area Network” and “Bluetooth”) (DELL-OZMO-1-026656).</p> <p>IEEE 802.15.1 (DELL-OZMO-1-002696), including: §§1.1; 6.1.2.1.</p> <p>IEEE 802.15.3 (DELL-OZMO-1-003991), including: §§1.1; 5.1; 8.4.3.6.</p> <p>IEEE 802.15.4 (DELL-OZMO-1-004315), including: §§1.1; 3.30.</p> <p>13/340,465 Prosecution History, including Amendment dated August 21, 2013 (DELL-OZMO-1-022058)</p>

No.	Claim Term	Defendants' Construction	Extrinsic Evidence
			<p>U.S. Pat. App. Pub. No. 2005/0286474 to Zelst (DELL-OZMO-1-026630)</p> <p>Under the Scheduling Order (Dkt. 24), Dell hereby identifies Dr. Jim Proctor as an expert witness who may offer opinion testimony regarding the proper construction of this term.</p>
2.	<p>WLAN (Defendants)</p> <ul style="list-style-type: none"> • wireless local area network (“LAN”) – ‘814 patent, claim 3 • wireless LAN – ‘991 patent, claims 3-5 • wireless local area network (“WLAN”) – ‘991 patent, claims 19-20 • wireless local area network (WLAN) – ‘934, 504 patent, all claims • WLAN – ‘659 patent, all claims • wireless local area network (“WLAN”) – ‘906 patent, all claims 	a wireless network with a typical coverage range on the order of 300 feet	<p>Minal Mishra <i>et al.</i>, “Wireless Multimedia Personal Area Networks: An Overview”, <i>Emerging Wireless Multimedia: Services and Technologies</i> (2005) (DELL-OZMO-1-026020): including Section 6.4.</p> <p>Newton Telecom Dictionary (22nd ed. 2006) (defining “WLAN”, “Wireless LANS”, and “Wireless”) (DELL-OZMO-1-026608).</p> <p>IEEE 802.11-1999 (DELL-OZMO-1-001793)</p> <p>IEEE 802.11a-1999 (DELL-OZMO-1-002321)</p> <p>IEEE 802.11b-1999 (DELL-OZMO-1-002411)</p> <p>IEEE 802.11g-2003 (DELL-OZMO-1-002565)</p> <p>IEEE 802.15.1 (DELL-OZMO-1-002696), including: §6.1.2.1</p> <p>Under the Scheduling Order (Dkt. 24), Dell hereby identifies Dr. Jim Proctor as an expert witness who may offer opinion testimony regarding the proper construction of this term.</p>

3.	802.11x (Defendants) <ul style="list-style-type: none"> • '814 patent, claim 4 • '991 patent, claims 7-8, 19-20 • '934 and '504 patents, all claims • '659 patent, claim 13, 24 • '906 patent, all claims 	Indefinite	Indefinite IEEE 802.11-1999 (DELL-OZMO-1-001793) IEEE 802.11a-1999 (DELL-OZMO-1-002321) IEEE 802.11b-1999 (DELL-OZMO-1-002411) IEEE 802.11g-2003 (DELL-OZMO-1-002565) IEEE 802.11n – 2009 (DELL-OZMO-1-026053) Wikipedia page for 802.11n-2009. (DELL-OZMO-1-026589) IEEE 802.11n Development: History, Process, and Technology (DELL-OZMO-1-026594) 13/340,465 Prosecution History, including Rejection dated July 20 2012 (DELL-OZMO-1-022058) Under the Scheduling Order (Dkt. 24), Dell hereby identifies Dr. Jim Proctor as an expert witness who may offer opinion testimony regarding the proper construction of this term and why it is indefinite.
4.	protocol (Defendants) all claims	set of rules	Webster's New World Computer Dictionary (10 th ed. 2003) (defining

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