

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY, GENERAL MOTORS LLC, and
NISSAN NORTH AMERICA, INC.,¹
Petitioners,

v.

NEO WIRELESS LLC,
Patent Owner.

Case IPR2023-00763
Patent 10,447,450

PATENT OWNER’S UPDATED EXHIBIT LIST

¹ General Motors LLC and Nissan North America, Inc. were joined as a petitioner to this proceeding based on a petition and motion for joinder filed in IPR2023-00962, which were granted.

EXHIBIT LIST	
2001	Declaration of William P. Alberth, Jr. [Alberth-Decl.]
2002	William P. Alberth, Jr. Curriculum Vitae [Alberth-CV]
2003	In re Neo Wireless, LLC Patent Litigation, 2:22-MD-03034-TGB, Joint Claim Construction Statement [Joint-CC-Statement]
2004	In re Neo Wireless, LLC Patent Litigation, 2:22-MD-03034-TGB, Exhibit A - Agreed Litigation Terms [Agreed-Lit.-Terms]
2005	In re Neo Wireless, LLC Patent Litigation, 2:22-MD-03034-TGB, Exhibit B - Disputed Litigation Terms [Disputed-Lit.-Terms]
2006-2013	Reserved
2014	Apr. 19, 2019 Letter from Sen. Tillis & Sen. Coons to USPTO Director [Tillis-Coons]
2015	'450 Patent Claim Comparison Table [Claims-Table]
2016	Neo Wireless, LLC v. Ford Motor Company, 4:22-cv-00210-GAF, Proof of Service of Summons [POS-Ford]
2017	Neo Wireless LLC v. Volkswagen et al, 1:22-CV-76, Return of Service of Summons and Complaint [POS-VW-Inc.]
2018	Neo Wireless LLC v. Volkswagen et al, 1:22-CV-76, Return of Service of Summons and Complaint [POS-VW-LLC]
2019	Defendants' Invalidity Contentions In In Re Neo Wireless LLC Patent Litigation, 2:22-MD-03034-TGB, served November 16, 2022 [Invalidity-Contentions]
2020	Carl Eklund, et al., <i>IEEE Standard 802.16: A Technical Overview of the WirelessMAN™ Air Interface for Broadband Wireless Access</i> , IEEE Communications Magazine, June 2002, at 98 [Eklund-Article]

2021	Brian Kiernan, <i>IEEE 802.16 Mobile Wireless MAN Study Group: Call for Contributions</i> , Aug. 23, 2002, https://www.ieee802.org/16/mobile/docs/80216sgm-02_08.pdf [Kiernan]
2022	Roger B. Marks, <i>The Evolution of WirelessMAN</i> , IEEE Microwave Magazine, Aug. 2008, at 72 [Marks]
2023	Second Declaration of William P. Alberth, Jr. [Alberth-2 nd -Decl.]
2024	Deposition Transcript of Dr. Todor Cooklev [Cooklev-1 st -Depo.]
2025	Todor Cooklev, <i>Wireless Communication Standards: A Study of IEEE 802.11, 802.15, and 802.16</i> , 2004 [Cooklev-Book]
2026	<i>Reserved.</i>
2027	Rami Lee et al., <i>Capacity Analysis Considering Channel Resource Overhead for Mobile Internet Access (WiBro)</i> , May 2005 [WiBro-Article]
2028	Chakchai So-In et al., “Resource Allocation in IEEE 802.16 Mobile WiMAX,” in <i>Orthogonal Frequency Division Multiple Access (OFDMA)</i> , April 2010
2029	Hua Wang & Lars Dittman, <i>Priority-Based Resource Allocation for Downlink OFDMA Systems Supporting RT and NRT Traffics</i> , May 2008
2030	Declaration of Xu Zhou in Support of Motion for <i>Pro Hac Vice</i> Admission
2031	<i>Reserved.</i>
2032	<i>Reserved.</i>
2033	Defendants’ Motion For Summary Judgment, <i>In re Neo Wireless, LLC Patent Litig.</i> , No. 2:22-md-03034 (E.D. Mich. Jun. 20, 2024) ECF No. 242-1 (“Defendants’ Motion For Summary Judgment”)

2034	Flow Chart For 35 U.S.C. § 102(e) Dates, available at https://www.uspto.gov/sites/default/files/web/offices/dcom/olia/aipa/102eflowchart.pdf (last visited December 26, 2024) [102(e)-Dates-Flowchart]
2035	EE Times, <i>Cut through the confusion of mobile WiMAX</i> , June 2007
2036	<i>Reserved</i>
2037	<i>Translation of Unexamined Korean Patent No. 10-2004-0065099</i>
2038	Declaration of Translator Corey Colling
2039	Second Deposition Transcript of Dr. Todor Cooklev [Cooklev-2 nd -Depo.]
2040	Patent Owner's Demonstrative Exhibits For Oral Hearing

Respectfully submitted,

/ Parham Hendifar /

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Date: June 5, 2025

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following documents were served by electronic service, by consent between the parties, on the date signed below:

PATENT OWNER'S UPDATED EXHIBIT LIST

EXHIBIT 2040

The addresses of the parties being served are as follows:

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Date: June 5, 2025