Exhibit A

Agreed Claim Terms[1][2]

#	Claim Term	Claims	Joint Proposed Construction
1	"In a multi-cell orthogonal frequency division multiple access (OFDMA) wireless communication system comprising a plurality of base stations and mobile stations, a mobile station configured to communicate with a serving base station in a cell via a communication	'366 Patent, Claim 1	The preamble is limiting. Plain and ordinary meaning.

[1] Volkswagen Grp. of Am., Inc. and Volkswagen Grp. of Am. Chattanooga Operations, LLC, do not take a position on the proposed constructions for any of the Agreed Claim Terms. That said, Volkswagen Grp. of Am., Inc. and Volkswagen Grp. of Am. Chattanooga Operations, LLC understand that they will be bound by any claim construction ruling set forth by the Court.

[2] Neo Wireless objects to the Volkswagen Defendants' decision to take no position on any claim terms (contravening the parties' agreed Discovery Plan, which Volkswagen signed). This is an attempt by the Volkswagen Defendants, in the IPRs that they alone filed, to adopt broad interpretations to support their invalidity positions; while accepting the benefit of the other Defendants' narrow, incompatible interpretations in this Court to support their non-infringement positions. It is especially bizarre in the context of this Exhibit, which presents *agreed* claim constructions (that one defendant apparently does not agree to). Neo is continuing to meet and confer with Volkswagen about this issue.

	channel, the mobile station comprising:”		
2	“In an orthogonal frequency division multiple access (OFDMA) wireless communication system, a method for signal transmission by a mobile station to a serving base station via a communication channel, the method comprising:”	’366 Patent, Claim 17	The preamble is limiting. Plain and ordinary meaning.
3	“A mobile station comprising:”	’908 Patent, Claim 1	The preamble is limiting. Plain and ordinary meaning.
4	“A mobile device in a wireless packet system using a frame structure of multiple frames for transmission, each frame comprising a plurality of time intervals, each time	’450 Patent, Claim 7	The preamble is limiting. Plain and ordinary meaning.

	interval comprising a plurality of orthogonal frequency division multiplexing (OFDM) symbols, and each OFDM symbol containing a plurality of frequency subcarriers, the mobile device configured to:”		
5	“A link adaption method by a mobile station served by a serving base station in an Orthogonal Frequency Division Multiplexing (OFDM) communication system, the communication system utilizing a transmission structure with time slots in the time domain and frequency subchannels in the frequency domain, the method comprising:”	’941 Patent, Claim 8	The preamble is limiting. Plain and ordinary meaning.

6	"A mobile station served by a serving base station in an Orthogonal Frequency Division Multiplexing (OFDM) communication system, the communication system utilizing a transmission structure with time slots in the time domain and frequency subchannels in the frequency domain, the mobile station comprising a receiver configured to:"	'941 Patent, Claim 13	The preamble is limiting. Plain and ordinary meaning.
7	"A mobile device in an Orthogonal Frequency Division Multiplexing (OFDM) communication system, the mobile device comprising"	'302 Patent, Claim 23	The preamble is limiting. Plain and ordinary meaning.
8	"An orthogonal frequency division multiple access	'512 Patent, Claim 15	The preamble is limiting. Plain and ordinary meaning.

	(OFDMA)-compatible mobile station that uses subcarriers in a frequency domain and time slots in a time domain, the OFDMA-compatible mobile station comprising:”		
9	A method performed by an orthogonal frequency division multiple access (OFDMA)-compatible mobile station that uses subcarriers in a frequency domain and time slots in a time domain, the method comprising:	’512 Patent, Claim 23	The preamble is limiting. Plain and ordinary meaning.
10	“time-frequency coordinate”	’450 Patent, Claim 7	“one-dimensional time-frequency coordinate”
11	“wherein modular coding is applied to the time-frequency resource units in the segment of	’450 Patent, Claim 11	“wherein a modular coding scheme is applied to the time-frequency resource units in the segment of time-frequency resource”

	time-frequency resource”		