# *Exhibit B*

**Disputed Claim Terms**[12]

| # | Proposed By | Claim Term | Claims | Plaintiff's Proposed Construction | Defendants' Proposed Construction |
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| 1 | Defendants | "configured to" | '366 Patent, Claims 1 & 5; '908 Patent, Claims 1–3 & 9; '450 Patent, Claim 7; '941 Patent, Claims 13 & 14; '302 Patent, Claim 23; '512 Patent, Claim 15 | Plain and ordinary meaning. No construction necessary.<br><br>Alternatively, if a construction is necessary: An apparatus/element is "configured to" perform a function if it includes hardware and/or software enabling the | "designed to" |

[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 Disputed 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. Neo is continuing to meet and confer with Volkswagen about this issue.

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| | | | | apparatus/element to perform the function. | |
| 2 | Defendants | "the ranging signal exhibits a low peak-to-average power ratio in the time domain" | '366 Patent, Claims 1 & 17 | Plain and ordinary meaning. No construction necessary.<br><br>Alternatively, to the extent construction is deemed necessary, "exhibits a low peak-to-average power ratio in the time domain" means "exhibits a peak-to-average power ratio in the time domain of 9dBs or less." | Indefinite. |
| 3 | Defendants | "a ranging sequence selected from a set of ranging sequences" | '366 Patent, Claims 1 & 17 | Plain and ordinary meaning. No construction necessary. | "a ranging sequence selected by said apparatus from a set of ranging sequences" |
| 4 | Jointly Proposed | "wherein the portion of the frequency band used for transmission of the | '908 Patent, Claim 4 | "wherein the portion of the frequency band used for transmission of the random access signal does not overlap | "wherein the portion of the frequency band used for transmission of the random access signal does not |

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| | | random access signal does not include control channels” | | with the portions of the frequency band used for control channels” | include channels carrying control information” |
| 5 | Defendants | “associated with” | ’908 Patent, Claims 1–2 & 9 | Plain and ordinary meaning. No construction necessary. | “identifying” |
| 6 | Defendants | “random access signal” | ’908 Patent, Claims 1–2, 4, & 6–9 | Plain and ordinary meaning. No construction necessary. | “direct sequence spread spectrum signal” |
| 7 | Defendants | “time-frequency resource unit” | ’450 Patent, Claims 7 & 11 | Plain and ordinary meaning. No construction necessary. | “a combination of time and frequency units designed according to the application requirements of the application that is being grouped” |

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| 8 | Jointly Proposed | "the antenna transmission scheme comprising a transmission diversity scheme or a multiple-input multiple-output (MIMO) scheme" | '941 Patent, Claims 8 & 13 | "the antenna transmission scheme is capable of comprising either a MIMO scheme or a transmission diversity scheme other than MIMO. To avoid any doubt, this requires supporting both MIMO and non-MIMO transmission diversity systems." | "the mobile-station specific transmission parameters alternatively indicate an antenna transmission scheme that comprises a MIMO scheme or an antenna transmission scheme comprising a transmission diversity scheme other than MIMO, wherein the antenna transmission scheme is capable of comprising either a MIMO scheme or a transmission diversity scheme other than MIMO. To avoid any doubt, this requires supporting both MIMO and non-MIMO transmission diversity systems." |

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| 9 | Jointly Proposed | "the mobile station-specific transmission parameters indicate … a corresponding subchannel configuration … the corresponding subchannel configuration characterized by distributed subcarriers or localized subcarriers in the frequency domain" | '941 Patent, Claims 8 & 13 | "the mobile station-specific transmission parameters indicate … a corresponding subchannel configuration . . the corresponding subchannel configuration characterized by distributed subcarriers or localized subcarriers in the frequency domain, wherein the subchannel configuration is capable of comprising either localized or distributed subcarriers. To avoid any doubt, this requires supporting both localized and distributed subchannel configurations." | "the mobile station-specific transmission parameter alternatively indicates either distributed subcarriers or localized subcarriers in the frequency domain as subchannel configurations" |

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| 10 | Defendants | "probing signal" | '302 Patent, Claims 23–24, 26, & 28 | Plain and ordinary meaning. No construction necessary. | "direct sequence spread spectrum signal" |
| 11 | Jointly Proposed | "the probing signal is configured to occupy a portion of spectrum in the uplink frequency band not designated for transmission of uplink control signals in the system" | '302 Patent, Claim 23 | "the probing signal is configured to reside within a portion of spectrum in the uplink frequency band not designated for transmission of uplink control signals in the system." | "the probing signal is configured to occupy a portion of spectrum in the uplink frequency band not designated for transmission of uplink control signals in the Orthogonal Frequency Division Multiplexing (OFDM) communication system" |
| 12 | Defendants | "a receiver configured to receive a request for a probing signal from a base station in the system" | '302 Patent, Claim 23 | Plain and ordinary meaning. No construction necessary. | "a receiver configured to receive a request for a probing signal from a base station in the Orthogonal Frequency Division Multiplexing (OFDM) communication system" |

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| 13 | Defendants | "the probing signal is configured to overlap, in the time domain, with uplink signals transmitted over an uplink frequency band by other mobile devices in the system" | '302 Patent, Claim 23 | Plain and ordinary meaning. No construction necessary. | "the probing signal is configured to overlap, in the time domain, with uplink signals transmitted over an uplink frequency band by other mobile devices in the Orthogonal Frequency Division Multiplexing (OFDM) communication system" |
| 14 | Plaintiff | "wherein the first plurality of subcarriers and the second plurality of subcarriers are received in at least one of the time slots" | '512 Patent, Claims 15 & 23 | "wherein the first plurality of subcarriers and the second plurality of subcarriers are received in at least one of the same time slots" | Plain and ordinary meaning. |
| 15 | Defendants | "second pilots of a second type" | '512 Patent, Claims 15 & 23 | Plain and ordinary meaning. No construction necessary. | "pilots possessing a set of characteristics common to all base stations of the system" |