

EXHIBIT C-1 to Defendants' Invalidity Contentions
Daingean Techs. v. AT&T Corp. et al., Case No. 2:23-cv-00123-JRG-RSP (E.D. Tex.)

**Invalidity of U.S. Patent No. 10,841,958 (“the 958 patent”) over
U.S. Patent Publication No. 2015/0382284 (“Brismar”)**

U.S. Patent Publication No. 2015/0382284 (“Brismar”) anticipates under at least 35 U.S.C. § 102(a)(2), and/or renders obvious under 35 U.S.C. § 103, alone or in combination with other references and the knowledge of a person of ordinary skill in the art, claims 1, 2, 3, and 4 of U.S. Patent No. 10,841,958 (“the ’958 Patent”).

Claim	Grounds for Invalidity
1. [Pre] An access node of a radio access network that communicates over a radio interface with a wireless terminal, the access node comprising:	Brismar teaches an access node of a radio access network that communicates over a radio interface with a wireless terminal. Illustrative citations showing disclosures of this element are reproduced below. [0022] According to one aspect of the present disclosure, a method is implemented by a network node in a wireless communication network for transmitting system information to a plurality of wireless terminals. According to the method, the network node transmits a first group of SIBs via a first physical channel, and transmits a second group of additional SIBs via a different, second physical channel. Brismar at [0022]. [0028] According to another aspect of the present disclosure, a method is implemented by a wireless terminal in a wireless communication network for processing system information. The wireless terminal processes information received from a base station over a first physical channel to identify a first group of SIBs, and also processes information received from the base station over a different, second physical channel to identify a second group of additional SIBs. Brismar at [0028].

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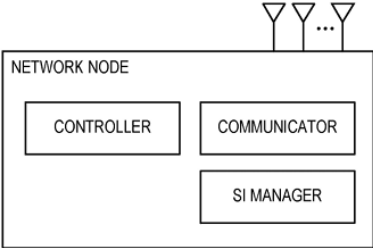
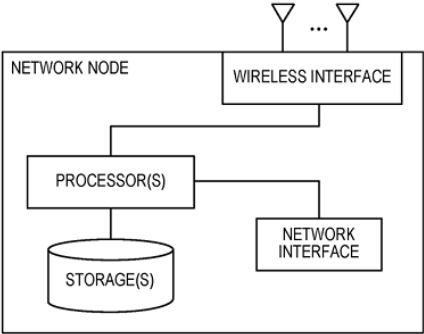
Claim	Grounds for Invalidity
	 FIG. 18A  FIG. 18B Brismar at Figure 18A-B.

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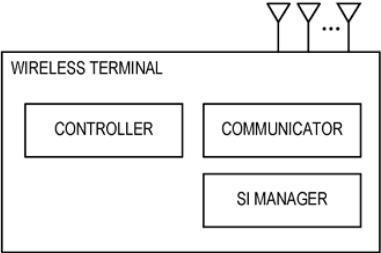
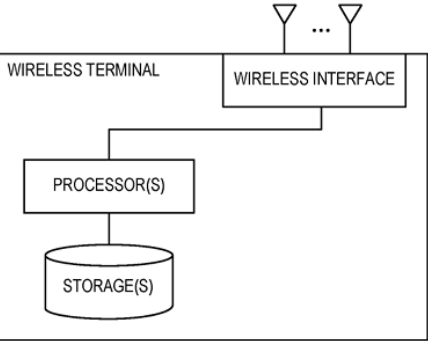
Claim	Grounds for Invalidity
	 FIG. 19A  FIG. 19B Brismar at Figure 19A-B. In addition, to the extent it is found that Brismar does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Brismar does not anticipate this claim, Brismar renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading

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Claim	Grounds for Invalidity
	or herein. A person of ordinary skill in the art would have been motivated to combine Brismar with any of the other prior art references identified in the cover pleading or herein with a reasonable expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.
[1.1] processor circuitry configured:	Brismar teaches processor circuitry. Illustrative citations showing disclosures of this element are reproduced below. [0201] Also, the components of the network node need not be implemented strictly in hardware. It is envisioned that the components can be implemented through any combination of hardware and software. For example, as illustrated in FIG. 18<i>b</i>, the network node may include one or more hardware processors, one or more storages (internal, external, both), and one or both of a wireless interface (in case of a radio node) and a network interface. [0202] The processor(s) may be configured to execute program instructions to perform the functions of one or more of the network node components. The instructions may be stored in a non-transitory storage medium or in firmware (e.g., ROM, RAM, Flash) (denoted as storage(s)). Brismar at [0201]-[0202].

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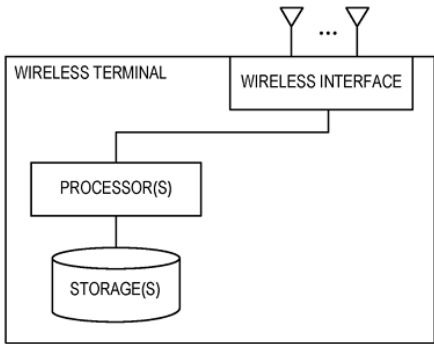
Claim	Grounds for Invalidity
	[0205] As illustrated in FIG. 19b, the wireless terminal may include one or more hardware processors, one or more storages, and a wireless interface. The processor(s) may be configured to execute program instructions to perform the functions of one or more of the network node components. The instructions may be stored in a non-transitory storage medium or in firmware (e.g., ROM, RAM, Flash) (denoted as storage(s)). Note that the program instructions may also be received through wired and/or or wireless transitory medium via one or both of the wireless and network interfaces. The wireless interface (e.g., a transceiver) may be configured to receive signals from and send signals to wireless terminals via one or more antennas. Brismar at [0205].  FIG. 19B Brismar at Figure 19B. In addition, to the extent it is found that Brismar does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Brismar does not anticipate this claim, Brismar renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading

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Claim	Grounds for Invalidity
	or herein. A person of ordinary skill in the art would have been motivated to combine Brismar with any of the other prior art references identified in the cover pleading or herein with a reasonable expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.
[1.2] to generate a first type system information block (SIB) comprising information and a value tag, the information indicating whether one or more associated second type system information blocks are provided by broadcast or on-demand, the value tag being updated upon a change of a corresponding second type SIB, the first type SIB being required for the wireless terminal to perform an initial access to the radio access network;	Brismar teaches generating a first type system information block (SIB) comprising information and a value tag, the information indicating whether one or more associated second type system information blocks are provided by broadcast or on-demand, the value tag being updated upon a change of a corresponding second type SIB, the first type SIB being required for the wireless terminal to perform an initial access to the radio access network. Illustrative citations showing disclosures of this element are reproduced below [0006] The scheduling information in the MIB/SB provides a list of the SB/SIBs transmitted in the cell and their location on the broadcast channel. The scheduling information also contains a value tag (or an expiration timer) for each SIB that gives information to the UE about the version and validity of the information currently sent on the broadcast channel. Brismar at [0006].

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Claim	Grounds for Invalidity
	[0012] Different update mechanisms apply for the SIBs depending on whether they contain static or dynamic information. For SIBs containing static information, a value tag is used to indicate when there is a need for the UE to read new information on the broadcast channel. The SIB value tag is sent together with the scheduling information in the MIB or in SB. Whenever the SIB content is modified, the corresponding SIB value tag is updated by the network. Due to the layered structure, a change on the lowest SIB level will propagate all the way up to the MIB, i.e., both the SB- and the MIB value tags will be incremented as well. The new MIB value tag is signaled in message Paging Type 1 (on Paging Channel “PCH”) and System Information Change Indication (on the Forward Access Channel “FACH” and High Speed Downlink Shared Channel “HS-DSCH”) to notify the UEs about the updated system information. Once the UE receives the notification, it will start from the top and compare the new value tags signaled on the broadcast channel with the stored value tags. If they differ, the UE needs to reacquire the SIB to get the updated information. Brismar at [0012]. [0087] In this embodiment, legacy update mechanisms may be reused. When the network (e.g., the RNC, RBS) modifies the content of a SIB transmitted on the second distribution channel, the network may also increment the SIB value tag contained in SB-BC1. The change may propagate up to the MIB on BC1, and the new MIB value tag may be signaled to the UE, e.g., on the PCH and FACH/HS-DSCH transport channels, using the legacy notification messages. For dynamic SIBs, expiration timers may be used.

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Claim	Grounds for Invalidity
	Brismar at [0087]. [0092] Similar to the first embodiment, legacy update mechanisms may be reused for the second embodiment. When the network modifies the content of a SIB transmitted on the second distribution channel, the network may also increment the SIB value tag contained in SB-BC2. The change may propagate up to the MIB on BC1 via the SB-BC1, and the new MIB value tag may be signaled to the UE, e.g., on the PCH and FACH/HS-DSCH transport channels, using the legacy notification messages. Brismar at [0092]. [0095] SB-BC2 may include a value tag to indicate the version of the contained information as well as a list of the SIBs transmitted on BC2 plus relevant scheduling information. The scheduling information may include some or all scheduling information elements listed for the first and/or second embodiments. Also, new set of information elements may be included. Brismar at [0095].

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Claim	Grounds for Invalidity
	[0103] FIG. 5b illustrates an example of a method performed by a network node (e.g., RNC, RBS) to distribute system information using the SIB of FIG. 5a. Grouping all static data in the same SIB implies that the information is transmitted on the broadcast channel using the same repetition period. This can be acceptable since in most cases, there may be little to no benefit in getting a subset of the static BC2 information before the UE has been able to read all legacy information on BC1. Thus, the SIB-S acquisition is not time critical and the repetition period can be set to the largest possible value that matches the time it takes for the UE to read the legacy SIBs on BC1. [0104] Furthermore, when the static information is grouped in the same SIB, the UE reads all SIB segments in order to decode the information, including information related to non-supported features, or other RRC states. However, the SIB-S data is only acquired by the UE when a new cell is entered (and no stored information with matching value tag exists), or when the SIB-S content is changed. Thus, the additional cost to read more information than needed can be neglected. [0105] SIB-D may include all dynamic system information and may be repeated on the second distribution channel with a start position and repetition period. For example, they may be defined by a standard (e.g., 3GPP). In an alternative, the start position and/or the repetition period may be provided in the SIB-S, MIB and/or the SB-BC2. As yet another alternative, there may be default start position and/or repetition period that can be superseded by the values provided in the SIB-S, MIB and/or the SB-BC2. [0106] The content of SIB-D can be associated with one or several expiration timers controlling how often the UE must re-read the information. For example, one subset of the information elements listed in SIB-D can be associated with Expiration timer 1, and another subset of the information elements can be associated with Expiration timer 2. The Expiration timers can be set to different values depending on how frequently the information is changed by the network. Typically the Expiration timer is equal to or longer than the SIB-D repetition period. [0107] The Expiration timers controlling how often the UE must acquire SIB-D information can, for example, be included in either SIB-S (as it can be considered to be static information) or in SIB-D (as the timers must be referenced in SIB-D anyway). [0108] In this third embodiment, the UE will understand whether or not BC2 is supported in the cell based on information transmitted on BC1 (e.g., the "BC2 indicator"). If this indicator is set, the UE may find the static information in SIB-S on a predetermined position on BC2 (standardized or provided in the MIB or SB on BC1). Once the SIB-S is acquired, the UE then can find out whether any dynamic data is broadcasted in the cell, and where this information is scheduled on BC2. Brismar at [0103]-[0108].

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Claim	Grounds for Invalidity
	[0109] FIG. 5c illustrates an example method performed by the UE to access the SIB-S and SIB-D of FIG. 5a on the second distributions channel. In this fourth embodiment, the legacy update mechanisms can be reused to some extent. However, a new SIB-S value tag may be included in the Paging Type 1 and System Information Change Indication messages. This value tag may be sent to the UE whenever the content of a SIB-S is modified. At reception of the notification (e.g., on PCH, or FACH/HS-DSCH), the UE may read and store a new version of the SIB-S. Brismar at [0109]. [0125] On-demand scheduling: In this alternative, the system information is not sent periodically on the broadcast channel. Rather, UE may request the information, e.g., when entering a new cell for which the UE has no stored information. This scheduling option makes it possible to use a more aggressive DTX scheme as the information may be sent only when a UE needs it. The UE may request the system information using different means. Examples of such means are described below. Brismar at [0125]. [0173] Hence, in this embodiment, as soon as a UE is missing SIB information because it has never been read or the value tag has changed, the UE may be required to first monitor the SI distribution in progress flag, and if SI distribution is not already in progress (or soon to start), the UE then may send its SI distribution request. Brismar at [0173].

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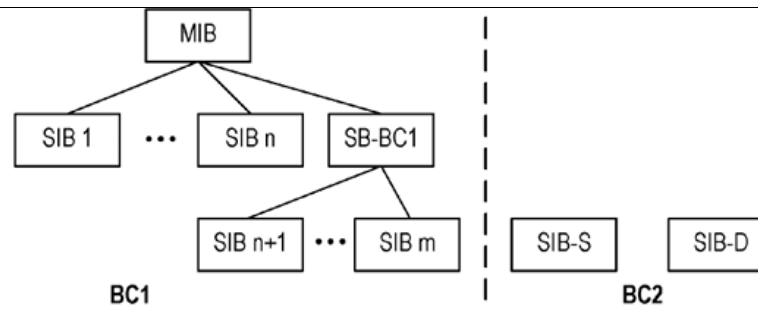


FIG. 5A

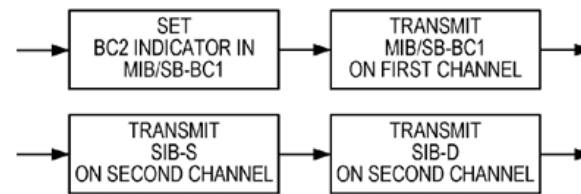


FIG. 5B

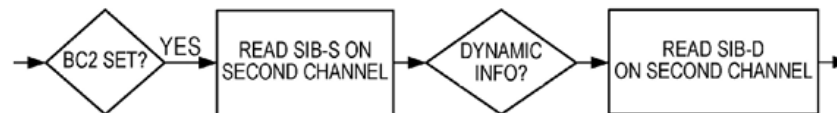


FIG. 5C

Brismar at Figures 5A – 5C.

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Claim	Grounds for Invalidity
	[0183] FIG. 16 illustrates an example method 100 implemented by a network node in a wireless communication network of transmitting system information to a plurality of wireless terminals. According to the method 100, the network node transmits a first group of SIBs via a first physical channel (block 102), and transmits a second group of additional SIBs via a different, second physical channel (block 104). Brismar at [0183]. FIG. 16 Brismar at Figure 16.

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Claim	Grounds for Invalidity
	In addition, to the extent it is found that Brismar does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Brismar does not anticipate this claim, Brismar renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein. A person of ordinary skill in the art would have been motivated to combine Brismar with any of the other prior art references identified in the cover pleading or herein with a reasonable expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.
[1.3] upon a change of a second type SIB whose associated information indicated before the change that the second type SIB was provided on-demand, to include in the first type SIB the information associated with the second type SIB indicating that the second type SIB is provided by broadcast;	Brismar teaches upon a change of a second type SIB whose associated information indicated before the change that the second type SIB was provided on-demand, to include in the first type SIB the information associated with the second type SIB indicating that the second type SIB is provided by broadcast. Illustrative citations showing disclosures of this element are reproduced below. [0167] When a network changes a particular type of on-demand system information, the network may broadcast the changed system information or all system information during a specified period. For example, the specified period may be a modification period. The specified period may be set in master system information or any necessary system information. Brismar at [0167].

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Claim	Grounds for Invalidity
	[0172] In the train scenario, the first UE to send a SI distribution request may trigger the RBS to block further SI distribution requests using the SI distribution in progress flag. There may be a short time between the first UE's request before the flag is updated on the downlink and read by all other UEs. Hence, during a short transition time there may be several SI distribution requests, but many UEs will be blocked from loading the uplink with useless requests (the RBS will anyway start to distribute the requested SI) (see FIG. 12). [0173] Hence, in this embodiment, as soon as a UE is missing SIB information because it has never been read or the value tag has changed, the UE may be required to first monitor the SI distribution in progress flag, and if SI distribution is not already in progress (or soon to start), the UE then may send its SI distribution request. [0174] FIG. 12 indicates one repetition of the SI after reception of the SI distribution request, and that the SI distribution in progress flag is cleared after all repetitions of requested SIs are finished. It is also possible to envision that the flag should be cleared as soon as the last transmission of a particular SI part is finished, to enable UEs that missed the earlier parts (that will not be repeated) to request them as soon as possible. Brismar at [0172]-[0174]. [0182] When second distribution channel is configured to use on-demand SI distribution, it is even possible to adapt the distribution dynamically to the current situation in the cell. The behavior can e.g., be connected to the cell load in uplink and downlink. If uplink is currently the limiting link, the RBS can disable on-demand SI distribution according to the method in the previous paragraphs. If downlink is the limiting link, it may be more important to not suffer from any unnecessary SI distribution, and then the RBS may employ on-demand SI distribution in the normal way (as shown in FIG. 12 above). Brismar at [0182].

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Claim	Grounds for Invalidity
	FIG. 12 Brismar at Figure 12. In addition, to the extent it is found that Brismar does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Brismar does not anticipate this claim, Brismar renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein. A person of ordinary skill in the art would have been motivated to combine Brismar with any of the other prior art references identified in the cover pleading or herein with a reasonable expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.
[1.4] transmitter circuitry configured to:	Brismar teaches transmitter circuitry. Illustrative citations showing disclosures of this element are reproduced below.

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Claim	Grounds for Invalidity
	[0183] FIG. 16 illustrates an example method 100 implemented by a network node in a wireless communication network of transmitting system information to a plurality of wireless terminals. According to the method 100, the network node transmits a first group of SIBs via a first physical channel (block 102), and transmits a second group of additional SIBs via a different, second physical channel (block 104). Brismar at [0183]. <pre>graph TD; 100 --> 102[TRANSMIT FIRST GROUP OF SIBs VIA A FIRST PHYSICAL CHANNEL]; 102 --> 104[TRANSMIT SECOND GROUP OF ADDITIONAL SIBs VIA A DIFFERENT, SECOND PHYSICAL CHANNEL];</pre> FIG. 16 Brismar at Figure 16.

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Claim	Grounds for Invalidity
	[0199] FIG. 18a illustrates an embodiment of a network node capable of distributing system information utilizing legacy and extended distribution channels according to one or more of the techniques described above. The example network node may include a controller, a communicator and a SI (system information) manager. The communicator may be structured to perform radio communications with wireless terminals via one or more antennas. The communicator may also be structured to perform wired and/or wireless communication with other network nodes. The SI manager may be structured to manage system information and to transmit, via the communicator, system related information (e.g., MIB, SB-BC1, SB-BC2, SIBs, SIB-S, SIB-D, etc.) to one or more wireless terminals. The SI manager may also respond to SI related requests from the wireless terminals. The controller may be structured to control the overall operation of the network node. [0200] FIG. 18a provides a logical view of the network node and the components included therein. It is not strictly necessary that each component be implemented as physically separate modules. Some or all components may be combined in a physical module. Brismar at [0199]-[0200]. [0202] The processor(s) may be configured to execute program instructions to perform the functions of one or more of the network node components. The instructions may be stored in a non-transitory storage medium or in firmware (e.g., ROM, RAM, Flash) (denoted as storage(s)). Brismar at [0202].

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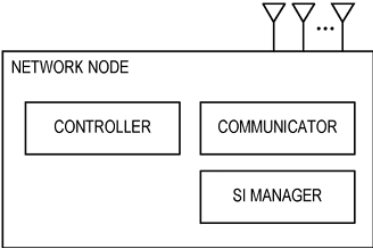
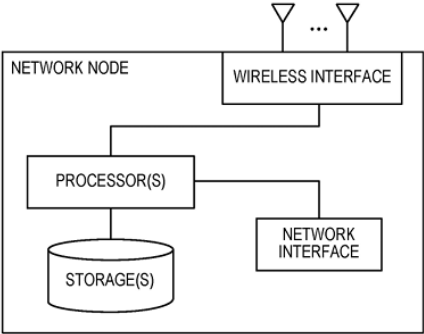
Claim	Grounds for Invalidity
	 FIG. 18A  FIG. 18B Brismar at Figure 18A-B.

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Claim	Grounds for Invalidity
	[0208] Some or all aspects of the disclosed subject matter may be applicable in a wireless network comprising one or more network nodes (e.g., RNC, RBS). An aspect of the disclosed subject matter may be directed to one or more methods performed by a network node. For example, the network may: [0209] transmit MIB/SB (which may include information of SIBs) over a legacy distribution channel, and transmit corresponding SIBs over an extended distribution channel; [0210] transmit MIB/SB (which may include information of SBs) over a legacy distribution channel, transmit corresponding SBs (which may include information of SIBs) over an extended distribution channel, and transmit corresponding SIBs over the extended distribution channel; [0211] transmit MIB/SB (which may include an indication that extended SI information is available) over a legacy distribution channel, transmit SB (which may include information of SIBs) over an extended distribution channel, and transmit corresponding SIBs over the extended distribution channel; [0212] transmit MIB/SB (which may include an indication that extended SI information is available) over a legacy distribution channel, transmit SIB-S (which may include static information) over an extended distribution channel, and transmit SIB-D (which may include dynamic information) over the extended distribution channel. Brismar at [0208]-[0212]. In addition, to the extent it is found that Brismar does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Brismar does not anticipate this claim, Brismar renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading

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Claim	Grounds for Invalidity
	or herein. A person of ordinary skill in the art would have been motivated to combine Brismar with any of the other prior art references identified in the cover pleading or herein with a reasonable expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.
[1.5] transmit the first type SIB;	Brismar teaches transmitting the first type SIB. Illustrative citations showing disclosures of this element are reproduced below. [0183] FIG. 16 illustrates an example method 100 implemented by a network node in a wireless communication network of transmitting system information to a plurality of wireless terminals. According to the method 100, the network node transmits a first group of SIBs via a first physical channel (block 102), and transmits a second group of additional SIBs via a different, second physical channel (block 104). Brismar at [0183]. [0184] In one or more embodiments, the first physical channel is configured to be read by a first group of wireless terminals and also by a different, second group of wireless terminals (e.g., the “legacy distribution channel” discussed above), and the second physical channel is configured to be read by only one of the first and second group of wireless terminals (e.g., the “extended distribution channel” discussed above). In one example, the first physical channel is the P-CCPCH, and the second physical channel is one of the S-CCPCH and the HS-PDSCH. Brismar at [0184].

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Claim	Grounds for Invalidity
	<pre> graph TD 100 --> 102 102 --> 104 style 102 fill:#fff,stroke:#000,stroke-width:1px style 104 fill:#fff,stroke:#000,stroke-width:1px </pre> The diagram is a flowchart labeled FIG. 16. It consists of two rectangular boxes connected by a downward-pointing arrow. The top box is labeled 102 and contains the text "TRANSMIT FIRST GROUP OF SIBs VIA A FIRST PHYSICAL CHANNEL". The bottom box is labeled 104 and contains the text "TRANSMIT SECOND GROUP OF ADDITIONAL SIBs VIA A DIFFERENT, SECOND PHYSICAL CHANNEL". A reference numeral 100 with an arrow points to the top box. The entire flowchart is enclosed in a larger rectangular frame. FIG. 16 Brismar at Figure 16. In addition, to the extent it is found that Brismar does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Brismar does not anticipate this claim, Brismar renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein. A person of ordinary skill in the art would have been motivated to combine Brismar with any of the other prior art references identified in the cover pleading or herein with a reasonable expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.

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Claim	Grounds for Invalidity
[1.6] transmit a message that triggers the wireless terminal to receive the first type SIB, wherein;	Brismar teaches transmitting a message that triggers the wireless terminal to receive the first type SIB. Illustrative citations showing disclosures of this element are reproduced below. [0072] For ease of reference, the existing SI distribution mechanism for SI broadcast may be referred to as “Broadcast 1” or “BC1.” As an illustration, the SI broadcast as specified by 3GPP Rel-99 framework may be considered to be an example of the BC1 mechanism. The scope of the BC1 mechanism may cover all protocols (e.g., NBAP, RRC, L1) and channels (logical channel: BCCH, transport channel: BCH, physical channel: P-CCPCH) used for existing system information distribution. Brismar at [0072]. Embodiments of SIB Structures for Extended SI Distribution [0074] Examples of multiple mechanisms to extend the SI distribution are presented below. In a first embodiment, the existing BC1 mechanisms are reused as much as possible. An example SIB structure is illustrated in FIG. 2a. The scheduling information in the SB-BC1 in the first distribution channel may be extended to enable references to the new SIBs transmitted on the second distribution channel. The information included in the SB-BC1 may include any one or more of: Brismar at [0074].

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Claim	Grounds for Invalidity
	[0075] a SIB type which identifies the SIBs (e.g., SIB m+1 . . . SIB x). The SIB type may implicitly indicate that the SIB is transmitted on the second distribution channel utilizing the BC2 mechanism; [0076] an explicit indication that the SIB is transmitted on the second distribution channel utilizing the BC2 mechanism; [0077] an indication whether the area scope of the SIB is “cell” or “PLMN”; [0078] a value tag if the SIB includes static information; [0079] an expiration timer if the SIB includes dynamic information; [0080] a start position (e.g., SFN) on the second distribution channel where the first SIB segment (e.g., SIB m+1) is scheduled and optionally one or several offset parameters if the subsequent SIB segments are not sent in consecutive TTIs; [0081] a repetition period indicating how often the SIB is repeated on the broadcast channel. Brismar at [0075]-[0081]. [0110] The new SB/SIBs to be transmitted on second distribution channel may be encoded and segmented in the RNC. The RNC may then pass the encoded SB/SIB segments and relevant scheduling information to the RBS, e.g., by using the NBAP procedure System Information Update. RBS may then map the SIB segments to System Information (SI) messages and repeat the information on the channel according to the scheduling information provided by RNC. Brismar at [0110]. [0170] One potential issue with UEs sending SI distribution requests is that many UEs can request that same SI informa-

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Claim	Grounds for Invalidity
	tion at the same time, causing a high uplink load. As an illustration, consider a case of a train with many UEs arriving into a new cell. All UEs on that train would like to read SI for the new cell. [0171] In order to avoid this unnecessary uplink load, the RBS can, according to one embodiment, be given the possibility to block UEs from sending SI distribution requests. This can be accomplished by introducing an RBS controlled flag in the downlink denoted as SI distribution in progress flag. In this embodiment, the UE may be required to read the SI distribution in progress flag before attempting to send the SI distribution request. If the flag indicates that SI distribution is in progress, the UE may be required to refrain from sending the SI distribution request. [0172] In the train scenario, the first UE to send a SI distribution request may trigger the RBS to block further SI distribution requests using the SI distribution in progress flag. There may be a short time between the first UE's request before the flag is updated on the downlink and read by all other UEs. Hence, during a short transition time there may be several SI distribution requests, but may UEs will be blocked from loading the uplink with useless requests (the RBS will anyway start to distribute the requested SI) (see FIG. 12). [0173] Hence, in this embodiment, as soon as a UE is missing SIB information because it has never been read or the value tag has changed, the UE may be required to first monitor the SI distribution in progress flag, and if SI distribution is not already in progress (or soon to start), the UE then may send its SI distribution request. Brismar at [0170]-[0173].

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Claim	Grounds for Invalidity
	[0182] When second distribution channel is configured to use on-demand SI distribution, it is even possible to adapt the distribution dynamically to the current situation in the cell. The behavior can e.g., be connected to the cell load in uplink and downlink. If uplink is currently the limiting link, the RBS can disable on-demand SI distribution according to the method in the previous paragraphs. If downlink is the limiting link, it may be more important to not suffer from any unnecessary SI distribution, and then the RBS may employ on-demand SI distribution in the normal way (as shown in FIG. 12 above). Brismar at [0182]. [0184] In one or more embodiments, the first physical channel is configured to be read by a first group of wireless terminals and also by a different, second group of wireless terminals (e.g., the "legacy distribution channel" discussed above), and the second physical channel is configured to be read by only one of the first and second group of wireless terminals (e.g., the "extended distribution channel" discussed above). In one example, the first physical channel is the P-CCPCH, and the second physical channel is one of the S-CCPCH and the HS-PDSCH. [0185] In one or more embodiments, the method 100 also includes the network node transmitting, via the first physical channel, scheduling information for reception of the additional SIBs on the second physical channel (see, e.g., FIG. 2a). The scheduling information may be included in a scheduling block transmitted via the first physical channel (e.g., SB-BC1 in FIG. 2a). Brismar at [0184]-[0185]. In addition, to the extent it is found that Brismar does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Brismar does not anticipate this claim, Brismar renders it obvious, either alone, in combination with the knowledge of a person of ordinary

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Claim	Grounds for Invalidity
	skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein. A person of ordinary skill in the art would have been motivated to combine Brismar with any of the other prior art references identified in the cover pleading or herein with a reasonable expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.
[1.7] whether or not the second type SIB has changed is determined based on a value tag, associated with the second type SIB, stored in the wireless terminal, and the value tag included in the first type SIB corresponding to the second type SIB.	Brismar teaches that whether or not the second type SIB has changed is determined based on a value tag, associated with the second type SIB, stored in the wireless terminal, and the value tag included in the first type SIB corresponding to the second type SIB. Illustrative citations showing disclosures of this element are reproduced below. [0097] FIG. 4e illustrates an example method performed by the UE to access the SIB of FIG. 4a on a second distributions channel. In this third embodiment, the legacy update mechanisms can be reused to some extent. However, a new SB-BC2 value tag may be included in the Paging Type 1 and System Information Change Indication messages. This value tag may be sent to the UE whenever the content of a BC2 SIB is modified. At reception of the notification (e.g., on PCH, or FACH/HS-DSCH), the UE may check the SB-BC2 and compare the new value tags for the BC2 SIBs with the stored ones. If they differ the UE may reacquire the modified SIB. Brismar at [0097].

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Claim	Grounds for Invalidity
	[0099] The presence of BC2 in the fourth embodiment may be indicated in the MIB or in SB-BC1 on the first distribution channel using the new “BC2 indicator”, which is similar to the third embodiment. When BC2 is enabled and the “BC2 indicator” is set, the network node may repeat the static SIB-S on the second distribution channel using a start position and repetition period. One or both of the start position and the repetition period may default to predetermined values. For example, they may be defined by a standard (e.g., 3GPP). In an alternative, the start position and/or the repetition period may be provided in the MIB and/or the SB-BC1. As yet another alternative, there may be default start position and/or repetition period that can be superseded by the values provided in the MIB and/or the SB-BC1. Brismar at [0099]. [0100] In addition to the static information, the SIB-S may also include one or both of the following: [0101] A value tag to indicate the version of the contained information in SIB-S; [0102] Information about the dynamic SIB-D. For example, the presence and position of SIB-D on the second distribution channel (this is considered to be static information). Brismar at [0100]-[0102].

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Claim	Grounds for Invalidity
	 <pre> graph LR Start(()) --> BC2{BC2 SET?} BC2 -- YES --> ReadSB[READ SB-BC2 ON SECOND CHANNEL FOR NEW SIB INFO] ReadSB --> ReadNewSIBs[READ NEW SIBs ON SECOND CHANNEL] ReadNewSIBs --> End(()) </pre> FIG. 4C Brismar at Figure 4C. [0173] Hence, in this embodiment, as soon as a UE is missing SIB information because it has never been read or the value tag has changed, the UE may be required to first monitor the SI distribution in progress flag, and if SI distribution is not already in progress (or soon to start), the UE then may send its SI distribution request. Brismar at [0173].

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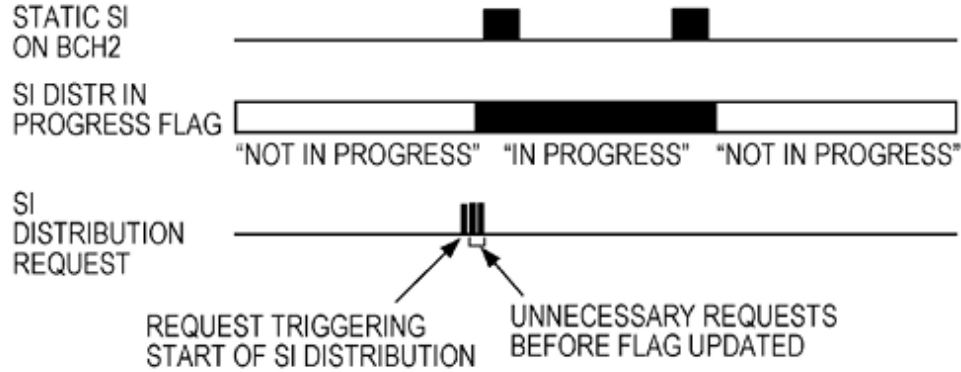
Claim	Grounds for Invalidity
	 FIG. 12 Brismar at Figure 12. In addition, to the extent it is found that Brismar does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Brismar does not anticipate this claim, Brismar renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein. A person of ordinary skill in the art would have been motivated to combine Brismar with any of the other prior art references identified in the cover pleading or herein with a reasonable expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.
2. The access node of claim 1, wherein the transmitter circuitry is further configured to transmit the second type	Brismar teaches transmitter circuitry further configured to transmit the second type SIB by broadcast after the change. Illustrative citations showing disclosures of this element are reproduced below.

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Claim	Grounds for Invalidity
SIB by broadcast after the change.	<pre> graph TD 100 --> 102[TRANSMIT FIRST GROUP OF SIBs VIA A FIRST PHYSICAL CHANNEL] 102 --> 104[TRANSMIT SECOND GROUP OF ADDITIONAL SIBs VIA A DIFFERENT, SECOND PHYSICAL CHANNEL] </pre> FIG. 16 Brismar at Figure 16. [0183] FIG. 16 illustrates an example method 100 implemented by a network node in a wireless communication network of transmitting system information to a plurality of wireless terminals. According to the method 100, the network node transmits a first group of SIBs via a first physical channel (block 102), and transmits a second group of additional SIBs via a different, second physical channel (block 104). Brismar at [0183].

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Claim	Grounds for Invalidity
	[0172] In the train scenario, the first UE to send a SI distribution request may trigger the RBS to block further SI distribution requests using the SI distribution in progress flag. There may be a short time between the first UE's request before the flag is updated on the downlink and read by all other UEs. Hence, during a short transition time there may be several SI distribution requests, but may UEs will be blocked from loading the uplink with useless requests (the RBS will anyway start to distribute the requested SI) (see FIG. 12). [0173] Hence, in this embodiment, as soon as a UE is missing SIB information because it has never been read or the value tag has changed, the UE may be required to first monitor the SI distribution in progress flag, and if SI distribution is not already in progress (or soon to start), the UE then may send its SI distribution request. [0174] FIG. 12 indicates one repetition of the SI after reception of the SI distribution request, and that the SI distribution in progress flag is cleared after all repetitions of requested SIs are finished. It is also possible to envision that the flag should be cleared as soon as the last transmission of a particular SI part is finished, to enable UEs that missed the earlier parts (that will not be repeated) to request them as soon as possible. Brismar at [0172]-[0174]. [0182] When second distribution channel is configured to use on-demand SI distribution, it is even possible to adapt the distribution dynamically to the current situation in the cell. The behavior can e.g., be connected to the cell load in uplink and downlink. If uplink is currently the limiting link, the RBS can disable on-demand SI distribution according to the method in the previous paragraphs. If downlink is the limiting link, it may be more important to not suffer from any unnecessary SI distribution, and then the RBS may employ on-demand SI distribution in the normal way (as shown in FIG. 12 above). Brismar at [0182].

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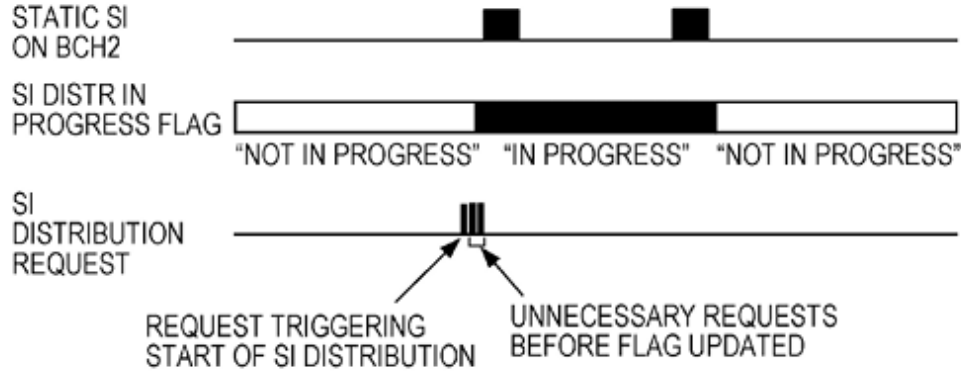
Claim	Grounds for Invalidity
	 FIG. 12 Brismar at Figure 12. In addition, to the extent it is found that Brismar does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Brismar does not anticipate this claim, Brismar renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein. A person of ordinary skill in the art would have been motivated to combine Brismar with any of the other prior art references identified in the cover pleading or herein with a reasonable expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.

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Claim	Grounds for Invalidity
3. [Pre] A method for an access node of a radio access network that communicates over a radio interface with a wireless terminal, the method comprising:	Brismar teaches a method for an access node of a radio access network that communicates over a radio interface with a wireless terminal. The discussion of claim element 1[pre] is incorporated herein by reference.
[3.1] generating a first type system information block (SIB) comprising information and a value tag, the information indicating whether one or more associated second type system information blocks are provided by broadcast or on-demand, the value tag being updated upon a change of a corresponding second type SIB, the first type SIB being required for the wireless terminal to perform an initial access to the radio access network;	Brismar teaches generating a first type system information block (SIB) comprising information and a value tag, the information indicating whether one or more associated second type system information blocks are provided by broadcast or on-demand, the value tag being updated upon a change of a corresponding second type SIB, the first type SIB being required for the wireless terminal to perform an initial access to the radio access network. The discussion of claim element [1.2] is incorporated herein by reference.
[3.2] upon a change of a second type SIB whose associated information indicated before the change that the second type SIB was provided on-demand, including in the first type SIB the information associated	Brismar teaches upon a change of a second type SIB whose associated information indicated before the change that the second type SIB was provided on-demand, including in the first type SIB the information associated with the second type SIB indicating that the second type SIB is provided by broadcast. The discussion of claim element [1.3] is incorporated herein by reference.

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Claim	Grounds for Invalidity
with the second type SIB indicating that the second type SIB is provided by broadcast;	
[3.3] transmitting the first type SIB;	Brismar teaches transmitting the first type SIB. The discussion of claim element [1.5] is incorporated herein by reference.
[3.4] transmitting a message that triggers the wireless terminal to receive the first type SIB,	Brismar teaches transmitting a message that triggers the wireless terminal to receive the first type SIB. The discussion of claim element [1.6] is incorporated herein by reference.
[3.5] wherein; whether or not the second type SIB has changed is determined based on a value tag, associated with the second type SIB, stored in the wireless terminal, and the value tag included in the first type SIB corresponding to the second type SIB.	Brismar teaches that whether or not the second type SIB has changed is determined based on a value tag, associated with the second type SIB, stored in the wireless terminal, and the value tag included in the first type SIB corresponding to the second type SIB. The discussion of claim element [1.7] is incorporated herein by reference.
4. The method of claim 3, further comprising transmitting the second type SIB by broadcast after the change.	Brismar teaches transmitting the second type SIB by broadcast after the change. The discussion of claim element [2] is incorporated herein by reference.