

The N93 User Manual is Materially Identical to the device

[1k]—wherein the controller controls each of the first and second radio communication circuit so that the first radio communication circuit transmits video information and the second radio communication circuit connects to the internet or the home network simultaneously

District Court

327. I previously showed how the controller in the N93 controls the Bluetooth radio to transmit video and the cellular radio (GSM or UMTS) to connect to the internet. *See also* my discussion of limitations [1a], [1b], 1[h], 1[i], 1[j]. The only aspect added by this limitation is that the control previously shown occur simultaneously.

IPR

Simultaneous

Some Challenged Claims require video transmissions/receipt over one radio and a “simultaneous” connection of a second radio to an internet or home network. N93 teaches simultaneous data packet connections over its UMTS and GSM radios on the one hand, and its WiFi and Bluetooth radios on the other. For example, N93 teaches the phone can be used as a modem for a PC to connect it to the Internet by simultaneously using a Bluetooth connection to the PC and a UMTS or GSM connection to the Internet. EX1010, 83. N93 explicitly teaches there can be a UMTS or GSM data packet connection and a simultaneous Wi-Fi connection. *Id.*, 18. N93 does state that the UI does not support certain options during a “voice call.” *Id.*, 24. N93, however, does not disclose any similar limitation related to simultaneous video transfers over Bluetooth and data connections over UMTS.