

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

|                                  |   |                           |
|----------------------------------|---|---------------------------|
| SECURE WI-FI LLC,                | § |                           |
|                                  | § | Case No. 2:24-cv-0047-JRG |
|                                  | § |                           |
| Plaintiff,                       | § |                           |
|                                  | § | Jury Trial Demanded       |
| vs.                              | § |                           |
|                                  | § |                           |
| SAMSUNG ELECTRONICS CO. LTD. and | § |                           |
| SAMSUNG ELECTRONICS AMERICA,     | § |                           |
| INC.,                            | § |                           |
|                                  | § |                           |
| Defendants.                      |   |                           |

**PLAINTIFF’S PATENT RULE 4-2 DISCLOSURES**

In accordance with Patent Rule 4-2 and the Court’s Docket Control Order (Dkt. 24), Plaintiff Secure Wi-Fi LLC (“Secure Wi-Fi” or “Plaintiff”) hereby identifies the proposed construction of each claim term, phrase, or clause that has been identified for claim construction purposes with respect to the asserted claims of U.S. Pat. Nos. 9,717,005 (the “’005 patent”), 9,961,552 (the “’552 patent”), and 10,694,384 (the “’384 patent”), collectively, the “Asserted Patents.” Secure Wi-Fi reserves the right to supplement, amend, or modify the following preliminary claim constructions for any reason, including in response to the identification by Defendants of preliminary terms including in response to the identification by Defendants of terms purportedly requiring construction, revised or additional proposed claim constructions, or extrinsic evidence, and to facilitate ultimate preparation of the Joint Claim Construction and Prehearing Statement. Claim terms not expressly defined below should be accorded their plain meaning to persons of ordinary skill in the art. Secure Wi-Fi further reserves the right to rely on any evidence cited by any other party as well as any expert declarations regarding claim

construction offered by any party to support its claim constructions, including all intrinsic and extrinsic evidence cited therein.

### **1) Expert Witnesses**

In support of its claim construction briefing, Plaintiff intends to submit and rely upon expert opinions, including of Dr. Robert Akl. Dr. Akl is qualified to opine on the understanding those skilled in the art would have in the field of technology of the Asserted Patents. As such, he will offer expert declaration testimony regarding the topics described below. Dr. Akl may provide details regarding his training, background and experience, and will explain what he believes should be the applicable level of educational and professional training and experience of one skilled in the art.

Dr. Akl may explain why he is at least one of such ordinary skill. Dr. Akl may also offer information and opinion describing and placing in context the inventions claimed in the Asserted Patents, as well as a helpful background and overview of the technology at the time of invention. Additionally, Dr. Akl expects to provide opinions relating to his understanding, as one skilled in the relevant art, of the claims of the Asserted Patents, of the disclosures and teachings of the specification of the Asserted Patents, and of the procedural and substantive aspects of the Asserted Patents' respective file histories, and the histories of related patents, before the Patent and Trademark Office that may be relevant to and helpful for analyzing and understanding the proper constructions of the disputed claim terms. Dr. Akl also expects to provide opinions directed to each of the disputed claim terms that should be given a particularized construction in support of Plaintiff's proposed constructions. In doing so, he intends to rely upon the claims themselves, the intrinsic evidence, the extrinsic evidence available to him, and his knowledge and expertise. Dr. Akl may also explain why, in his opinion, no particularized construction need be given for certain

of the proposed constructions offered by Defendants, because the plain language of such terms would be readily understood by one skilled in the art at the time of invention. As a result, Dr. Akl may opine that no particularized construction for these terms is necessary or appropriate and that the plain and ordinary meaning should apply. Further, Dr. Akl may explain why, in his opinion, Defendants' proposed constructions for terms and phrases diverge from the plain and ordinary meaning without justification, are artificially narrow, or do not adequately capture the proper scope of the patent terms as claimed. Dr. Akl may also opine as to why, in his opinion, Defendants' contentions, if any, that certain claim terms set forth below are indefinite do not pass muster, and why such claim terms are not indefinite. Each term, when viewed in light of the claims, specification and prosecution histories, inform those skilled in the art about the scope of the invention with reasonable certainty, including by providing objective boundaries for those of skill in the art. As Defendants have not yet articulated any basis or support for any indefinite contention, Plaintiff reserves the right to address such contentions in the first instance in connection with its responsive claim construction brief(s). Should Defendants offer their own expert declaration(s) in support of their claim construction briefing, Dr. Akl reserves the right to review, analyze, and respond to such opinions, to the extent necessary, in connection with Plaintiff's responsive and/or reply claim construction briefs. Dr. Akl also reserves the right to assess, and opine on, any extrinsic evidence Defendants choose to identify, produce, disclose, or rely upon in support of any of their claim construction briefs, and to identify, produce, disclose, or rely upon additional extrinsic evidence in support of such further analysis and opinion and identify or discuss extrinsic evidence relevant to respond to any of Defendants' proposed constructions, which have yet to be disclosed. Finally, Dr. Akl, and/or other expert(s) retained by Plaintiff, may also offer testimony in rebuttal to any expert testimony offered by Defendants including without limitations with respect to the

level of ordinary skill in the art, the technology described in the asserted patents, technical background concerning any claim term and what one of ordinary skill in the art would understand the claim term to mean in view of the specifications, the prosecution histories, the claim language, and/or the extrinsic evidence.

By identifying Dr. Akl, Plaintiff does not waive any right and is not precluded from relying on other experts with similar qualifications who may provide a declaration or testimony addressing these issues.

Dated: January 27, 2025

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*Attorneys for Plaintiff*  
Secure Wi-Fi LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on January 27, 2025, counsel of record for the Defendants are being served with a copy of the foregoing document via email.

By: /s/ Marc Belloli  
Marc Belloli

## ATTACHMENT A

### I. '005 PATENT

| Claim Term or Phrase          | Proposed Claim Construction | Extrinsic Evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------------------|-----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| "fake device identifier"      | No construction necessary   | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the plain and ordinary meaning of this term in light of the intrinsic and extrinsic evidence and may refer to the intrinsic evidence and any extrinsic evidence available to him, including the extrinsic evidence identified above, in opining on the plain and ordinary meaning.</p> <p>Dr. Akl may also opine that this term is not indefinite and explain why a person of ordinary skill in the art would have reasonable certainty as to its scope in light of the surrounding claim language as well as the specification.</p> <p>Dr. Akl may also rely on any evidence cited by Defendants' experts and may provide opinions in rebuttal to any testimony or evidence identified and/or submitted by Defendants.</p> |
| "authentic device identifier" | No construction necessary   | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

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| "mobile operating server" | No construction necessary | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the plain and ordinary meaning of this term in light of the intrinsic and extrinsic evidence and may refer to the intrinsic evidence and any extrinsic evidence available to him, including the extrinsic evidence identified above, in opining on the plain and ordinary meaning.</p> <p>Dr. Akl may also opine that this term is not indefinite and explain why a person of ordinary skill in the art would have reasonable certainty as to its scope in light</p>                           |

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| "is an authenticated access point" | <p>No construction necessary</p> <p>"authenticated" should be given its plain and ordinary meaning</p> | <p>SECUREWIFI0001665-1671 - Cambridge Advanced Learner's Dictionary (2013 Ed.) (defining "authenticate" as "to prove that something is real, true or what people say it is")</p> <p>SECUREWIFI0001672 – Merriam-Webster's Dictionary (defining "authenticate" as "to prove or serve to prove to be real, true, or genuine")</p> <p>SECUREWIFI0001673-1674 - The Authoritative Dictionary of IEEE Standards Terms (2000 Ed.) (defining "authentication" as "the process of validating a user or process to verify that the user or process is not counterfeit")</p> <p>SECUREWIFI0001675-1677 - Newton's Telecom Dictionary (1997 Ed.) (defining "authentication" as "the process whereby a user or information source proves they are who they claim to be")</p> <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine on the plain and ordinary meaning of the term. Dr. Akl may explain the plain and ordinary meaning of this term in light of the intrinsic and extrinsic evidence and may</p> |

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| "is...the at least one authenticated access point" | <p>No construction necessary</p> <p>"authenticated" should be given its plain and ordinary meaning</p> | <p>SECUREWIFI0001665-1671 - Cambridge Advanced Learner's Dictionary (2013 Ed.) (defining "authenticate" as "to prove that something is real, true or what people say it is")</p> <p>SECUREWIFI0001672 – Merriam-Webster's Dictionary (defining "authenticate" as "to prove or serve to prove to be real, true, or genuine")</p> <p>SECUREWIFI0001673-1674 - The Authoritative Dictionary of IEEE Standards Terms (2000 Ed.) (defining "authentication" as "the process of validating a user or process to verify that the user or process is not counterfeit")</p>                                                        |

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| “controlled by the mobile operating server” | No construction necessary | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

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| "connection request" | No construction necessary | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the plain and ordinary meaning of this term in light of the intrinsic and extrinsic evidence and may refer to the intrinsic evidence and any extrinsic evidence available to him, including the extrinsic evidence identified above, in opining on the plain and ordinary meaning.</p> <p>Dr. Akl may also opine that this term is not indefinite and explain why a person of ordinary skill in the art would have reasonable certainty as to its scope in light of the surrounding claim language as well as the specification.</p> |

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| "random"       | No construction necessary | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the plain and ordinary meaning of this term in light of the intrinsic and extrinsic evidence and may refer to the intrinsic evidence and any extrinsic evidence available to him, including the extrinsic evidence identified above, in opining on the plain and ordinary meaning.</p> <p>Dr. Akl may also opine that this term is not indefinite and explain why a person of ordinary skill in the art would have reasonable certainty as to its scope in light of the surrounding claim language as well as the specification.</p> <p>Dr. Akl may also rely on any evidence cited by Defendants' experts and may provide opinions in rebuttal to any testimony or evidence identified and/or submitted by Defendants.</p> |
| "access point" | No construction necessary | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

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| "authenticated access point list" | <p>No construction necessary</p> <p>"authenticated" should be given its plain and ordinary meaning</p> | <p>SECUREWIFI0001665-1671 - Cambridge Advanced Learner's Dictionary (2013 Ed.) (defining "authenticate" as "to prove that something is real, true or what people say it is")</p> <p>SECUREWIFI0001672 – Merriam-Webster's Dictionary (defining "authenticate" as "to prove or serve to prove to be real, true, or genuine")</p> <p>SECUREWIFI0001673-1674 - The Authoritative Dictionary of IEEE Standards Terms (2000 Ed.) (defining "authentication" as "the process of validating a user or process to verify that the user or process is not counterfeit")</p> <p>SECUREWIFI0001675-1677 - Newton's Telecom Dictionary (1997 Ed.) (defining "authentication" as</p>                                                    |

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|  |  | <p>“the process whereby a user or information source proves they are who they claim to be”)</p> <p>Expert Declaration: Dr. Akl may opine on the plain and ordinary meaning of the term. Dr. Akl may explain the plain and ordinary meaning of this term in light of the intrinsic and extrinsic evidence and may refer to the intrinsic evidence and any extrinsic evidence available to him, including the extrinsic evidence identified above, in opining on the plain and ordinary meaning.</p> <p>Dr. Akl may also opine that this term is not indefinite and explain why a person of ordinary skill in the art would have reasonable certainty as to its scope in light of the surrounding claim language as well as the specification.</p> <p>Dr. Akl may also rely on any evidence cited by Defendants’ experts and may provide opinions in rebuttal to any testimony or evidence identified and/or submitted by Defendants.</p> |
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## II. ’552 PATENT

| Claim Term or Phrase     | Proposed Claim Construction | Extrinsic Evidence                                                                                                                                                          |
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| “fake device identifier” | No construction necessary   | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of</p> |

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| "authentic device identifier" | No construction necessary | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the plain and ordinary meaning of this term in light of the intrinsic and extrinsic evidence and may refer to the intrinsic evidence and any extrinsic evidence available to him, including the extrinsic evidence identified above, in opining on the plain and ordinary meaning.</p> <p>Dr. Akl may also opine that this term is not indefinite and explain why a person of ordinary skill in the art would have reasonable certainty as to its scope in light</p>                                                                                   |

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|                                           |                           | <p>of the surrounding claim language as well as the specification.</p> <p>Dr. Akl may also rely on any evidence cited by Defendants' experts and may provide opinions in rebuttal to any testimony or evidence identified and/or submitted by Defendants.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| "fake media access control (MAC) address" | No construction necessary | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the plain and ordinary meaning of this term in light of the intrinsic and extrinsic evidence and may refer to the intrinsic evidence and any extrinsic evidence available to him, including the extrinsic evidence identified above, in opining on the plain and ordinary meaning.</p> <p>Dr. Akl may also opine that this term is not indefinite and explain why a person of ordinary skill in the art would have reasonable certainty as to its scope in light of the surrounding claim language as well as the specification.</p> <p>Dr. Akl may also rely on any evidence cited by Defendants' experts and may provide opinions in rebuttal to any testimony or evidence identified and/or submitted by Defendants.</p> |
| "server"                                  | No construction necessary | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

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| "is an authenticated access point" | <p>No construction necessary</p> <p>"authenticated" should be given its plain and ordinary meaning</p> | <p>SECUREWIFI0001665-1671 - Cambridge Advanced Learner's Dictionary (2013 Ed.) (defining "authenticate" as "to prove that something is real, true or what people say it is")</p> <p>SECUREWIFI0001672 – Merriam-Webster's Dictionary (defining "authenticate" as "to prove or serve to prove to be real, true, or genuine")</p> <p>SECUREWIFI0001673-1674 - The Authoritative Dictionary of IEEE Standards Terms (2000 Ed.) (defining "authentication" as "the process of validating a user or process to verify that the user or process is not counterfeit")</p>                                                                                                                                                                                                                                                                       |

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| “controlled by the server” | No construction necessary | Any extrinsic evidence identified by Defendants                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

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| "is under control of the server" | No construction necessary | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the plain and ordinary meaning of this term in light of the intrinsic and extrinsic evidence and may refer to the intrinsic evidence and any extrinsic evidence available to him, including the extrinsic evidence identified above, in opining on the plain and ordinary meaning.</p>                                                                                                                                                                                                                                                                                                                                                                               |

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| "connection request" | No construction necessary | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the plain and ordinary meaning of this term in light of the intrinsic and extrinsic evidence and may refer to the intrinsic evidence and any extrinsic evidence available to him, including the extrinsic evidence identified above, in opining on the plain and ordinary meaning.</p> <p>Dr. Akl may also opine that this term is not indefinite and explain why a person of ordinary skill in the art would have reasonable certainty as to its scope in light of the surrounding claim language as well as the specification.</p> <p>Dr. Akl may also rely on any evidence cited by Defendants' experts and may provide opinions in rebuttal to any testimony or evidence identified and/or submitted by Defendants.</p> |

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| “random”       | No construction necessary | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the plain and ordinary meaning of this term in light of the intrinsic and extrinsic evidence and may refer to the intrinsic evidence and any extrinsic evidence available to him, including the extrinsic evidence identified above, in opining on the plain and ordinary meaning.</p> <p>Dr. Akl may also opine that this term is not indefinite and explain why a person of ordinary skill in the art would have reasonable certainty as to its scope in light of the surrounding claim language as well as the specification.</p> <p>Dr. Akl may also rely on any evidence cited by Defendants’ experts and may provide opinions in rebuttal to any testimony or evidence identified and/or submitted by Defendants.</p> |
| “access point” | No construction necessary | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the plain and ordinary meaning of this term in light of the intrinsic and extrinsic evidence and may refer to the intrinsic evidence and any extrinsic evidence available to him, including the extrinsic evidence identified above, in opining on the plain and ordinary meaning.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                      |

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| "authenticated access point list" | <p>No construction necessary</p> <p>"authenticated" should be given its plain and ordinary meaning</p> | <p>SECUREWIFI0001665-1671 - Cambridge Advanced Learner's Dictionary (2013 Ed.) (defining "authenticate" as "to prove that something is real, true or what people say it is")</p> <p>SECUREWIFI0001672 – Merriam-Webster's Dictionary (defining "authenticate" as "to prove or serve to prove to be real, true, or genuine")</p> <p>SECUREWIFI0001673-1674 - The Authoritative Dictionary of IEEE Standards Terms (2000 Ed.) (defining "authentication" as "the process of validating a user or process to verify that the user or process is not counterfeit")</p> <p>SECUREWIFI0001675-1677 - Newton's Telecom Dictionary (1997 Ed.) (defining "authentication" as "the process whereby a user or information source proves they are who they claim to be")</p> <p>Any extrinsic evidence identified by Defendants</p> |

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| "in response to" | No construction necessary | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the plain and ordinary meaning of this term in light of the intrinsic and extrinsic evidence and may refer to the intrinsic evidence and any extrinsic evidence available to him, including the extrinsic evidence identified above, in opining on the plain and ordinary meaning.</p> <p>Dr. Akl may also opine that this term is not indefinite and explain why a person of ordinary skill in the art</p>                                                                                                                                           |

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### III. '384 PATENT

| Claim Term or Phrase                      | Proposed Claim Construction | Extrinsic Evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------------------------------|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| "fake media access control (MAC) address" | No construction necessary   | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the plain and ordinary meaning of this term in light of the intrinsic and extrinsic evidence and may refer to the intrinsic evidence and any extrinsic evidence available to him, including the extrinsic evidence identified above, in opining on the plain and ordinary meaning.</p> <p>Dr. Akl may also opine that this term is not indefinite and explain why a person of ordinary skill in the art would have reasonable certainty as to its scope in light of the surrounding claim language as well as the specification.</p> |

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|                                                                                                                       |                           | Dr. Akl may also rely on any evidence cited by Defendants' experts and may provide opinions in rebuttal to any testimony or evidence identified and/or submitted by Defendants.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| "authentic device identifier"                                                                                         | No construction necessary | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the plain and ordinary meaning of this term in light of the intrinsic and extrinsic evidence and may refer to the intrinsic evidence and any extrinsic evidence available to him, including the extrinsic evidence identified above, in opining on the plain and ordinary meaning.</p> <p>Dr. Akl may also opine that this term is not indefinite and explain why a person of ordinary skill in the art would have reasonable certainty as to its scope in light of the surrounding claim language as well as the specification.</p> <p>Dr. Akl may also rely on any evidence cited by Defendants' experts and may provide opinions in rebuttal to any testimony or evidence identified and/or submitted by Defendants.</p> |
| "media access control (MAC) address...that is distinct from an actual MAC address for the hardware network interface" | No construction necessary | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the plain and ordinary meaning of this term in light of the</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

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| "MAC address for the end device that is distinct from the actual MAC address" | No construction necessary | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the plain and ordinary meaning of this term in light of the intrinsic and extrinsic evidence and may refer to the intrinsic evidence and any extrinsic evidence available to him, including the extrinsic evidence identified above, in opining on the plain and ordinary meaning.</p> <p>Dr. Akl may also opine that this term is not indefinite and explain why a person of ordinary skill in the art would have reasonable certainty as to its scope in light of the surrounding claim language as well as the specification.</p> |

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| "actual original MAC address of a hardware network interface" | No construction necessary | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the plain and ordinary meaning of this term in light of the intrinsic and extrinsic evidence and may refer to the intrinsic evidence and any extrinsic evidence available to him, including the extrinsic evidence identified above, in opining on the plain and ordinary meaning.</p> <p>Dr. Akl may also opine that this term is not indefinite and explain why a person of ordinary skill in the art would have reasonable certainty as to its scope in light of the surrounding claim language as well as the specification.</p> <p>Dr. Akl may also rely on any evidence cited by Defendants' experts and may provide opinions in rebuttal to any testimony or evidence identified and/or submitted by Defendants.</p> |
| "actual MAC address for a hardware network interface"         | No construction necessary | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the plain and ordinary meaning of this term in light of the</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

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| "actual MAC address" | No construction necessary | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the plain and ordinary meaning of this term in light of the intrinsic and extrinsic evidence and may refer to the intrinsic evidence and any extrinsic evidence available to him, including the extrinsic evidence identified above, in opining on the plain and ordinary meaning.</p> <p>Dr. Akl may also opine that this term is not indefinite and explain why a person of ordinary skill in the art would have reasonable certainty as to its scope in light of the surrounding claim language as well as the specification.</p> |

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| "randomly"           | No construction necessary | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the plain and ordinary meaning of this term in light of the</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

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| "is an authenticated access point" | No construction necessary<br><br>"authenticated" should be given its plain and ordinary meaning | <p>SECUREWIFI0001665-1671 - Cambridge Advanced Learner's Dictionary (2013 Ed.) (defining "authenticate" as "to prove that something is real, true or what people say it is")</p> <p>SECUREWIFI0001672 – Merriam-Webster's Dictionary (defining "authenticate" as "to prove or serve to prove to be real, true, or genuine")</p> <p>SECUREWIFI0001673-1674 - The Authoritative Dictionary of IEEE Standards Terms (2000 Ed.) (defining "authentication" as "the process of validating a user or process to verify that the user or process is not counterfeit")</p> <p>SECUREWIFI0001675-1677 - Newton's Telecom Dictionary (1997 Ed.) (defining "authentication" as "the process whereby a user or information source proves they are who they claim to be")</p> <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine on the plain and ordinary meaning of the term. Dr. Akl may explain the plain and ordinary meaning of this term in light of the intrinsic and extrinsic evidence and may refer to the intrinsic evidence and any extrinsic evidence available to him, including the extrinsic</p> |

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| "access point" | No construction necessary | <p>Any extrinsic evidence identified by Defendants</p> <p>Expert Declaration: Dr. Akl may opine that this term does not require a particularized construction as one of ordinary skill in the art would understand it as having a plain and ordinary meaning. Dr. Akl may explain the plain and ordinary meaning of this term in light of the intrinsic and extrinsic evidence and may refer to the intrinsic evidence and any extrinsic evidence available to him, including the extrinsic evidence identified above, in opining on the plain and ordinary meaning.</p> <p>Dr. Akl may also opine that this term is not indefinite and explain why a person of ordinary skill in the art would have reasonable certainty as to its scope in light of the surrounding claim language as well as the specification.</p> <p>Dr. Akl may also rely on any evidence cited by Defendants' experts and may provide opinions in</p> |

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| “list of authenticated access points” | <p>No construction necessary</p> <p>“authenticated” should be given its plain and ordinary meaning</p> | <p>SECUREWIFI0001665-1671 - Cambridge Advanced Learner’s Dictionary (2013 Ed.) (defining “authenticate” as “to prove that something is real, true or what people say it is”)</p> <p>SECUREWIFI0001672 – Merriam-Webster’s Dictionary (defining “authenticate” as “to prove or serve to prove to be real, true, or genuine”)</p> <p>SECUREWIFI0001673-1674 - The Authoritative Dictionary of IEEE Standards Terms (2000 Ed.) (defining “authentication” as “the process of validating a user or process to verify that the user or process is not counterfeit”)</p> <p>SECUREWIFI0001675-1677 - Newton’s Telecom Dictionary (1997 Ed.) (defining “authentication” as “the process whereby a user or information source proves they are who they claim to be”)</p> <p>Any extrinsic evidence identified by Defendants</p> |

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