

## **EXHIBIT C-1**

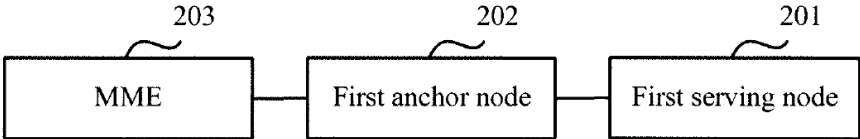
### **Summary of Invalidity Analysis of U.S. Patent No. 10,616,932 (“’932 Patent”) in view of United States Patent No. 10,257,881 to Lin (“Lin ’881”)**

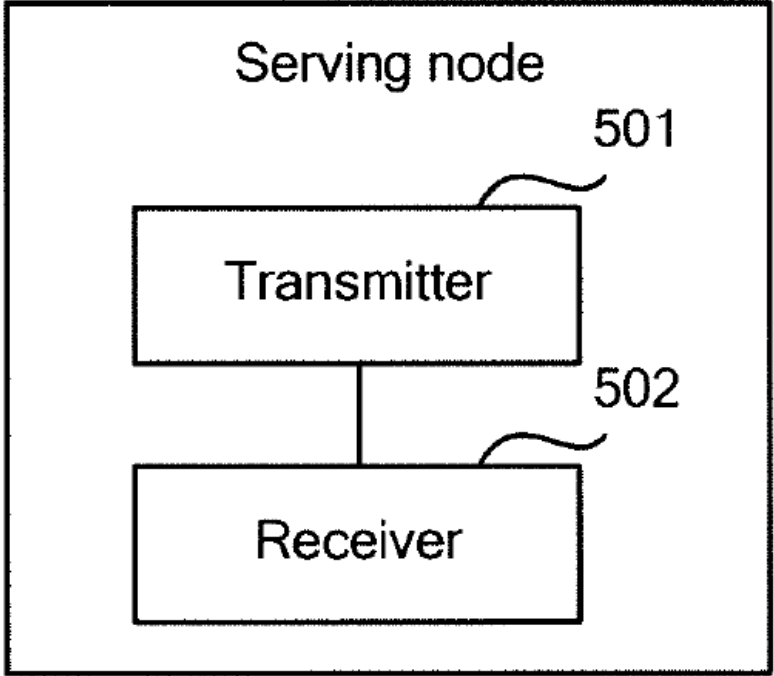
United States Patent No. 10,257,881 to Lin (“Lin ’881”), published on April 9, 2019 and claims priority to PCT Application No. PCT/CN2014/089300 filed October 23, 2014 and published as WO 2016/061789 on April 28, 20165 (the “’789 Publication”). The ’789 Publication supports at least Claim 11 of Lin ’881. By way of example only, at least the following disclosures of the ’789 Publication are sufficient to support Claim 11 of Lin ’881. *See, e.g.*, ’789 Publication at FIG. 2, FIG. 3, FIG. 5, FIG. 7, FIG. 8, FIG. 12, 36, 39-41, 44-46, 48, 64, 65-66, 68-69. Therefore, Lin ’881 qualifies as prior art to the ’932 Patent under 35 U.S.C. § 102(a). As described in the following claim chart, at least under Pegasus’s apparent infringement theory, the asserted claims of the ’932 Patent are invalid as expressly and/or inherently anticipated by Lin ’881.

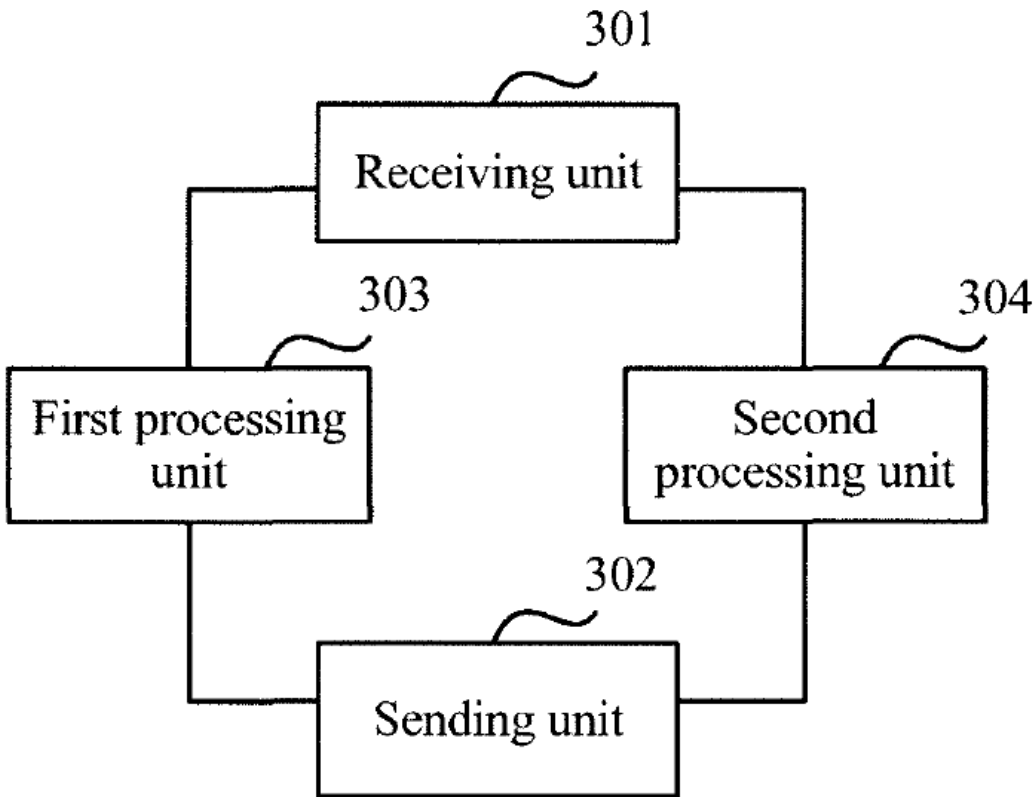
To the extent that Lin ’881 is found not to anticipate, expressly or inherently, one or more of the asserted claims of the ’932 Patent, at least under Pegasus’s apparent infringement theory, these claims are invalid as obvious in view of Lin ’881 in view of the background knowledge and ordinary creativity of a person having ordinary skill in the art at the time of the alleged invention, or in combination with other prior art identified in the cover pleading, herein, or as disclosed in Defendants’ Invalidity Contentions and accompanying charts and appendices. A person of ordinary skill would have been motivated to combine Lin ’881 and any other prior art references, including but not limited to the other prior art 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.

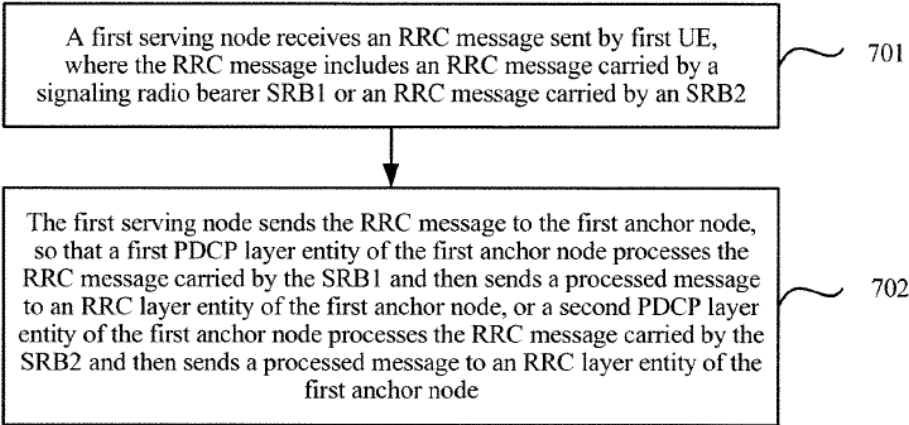
Defendants reserve the right to amend or supplement this invalidity chart at a later date.

# 1. Claim 1

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----------------------------------------------------------|---------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Claim Language                                           |                                                                                                         | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 1[pre]                                                   | A method of configuring, by an access unit, a wireless connection of a terminal, the method comprising: | <p>To the extent the preamble is limiting, at least under Pegasus's apparent infringement theory, Lin '881 discloses "A method of configuring, by an access unit, a wireless connection of a terminal, the method comprising." For example, Lin '881 discloses this limitation based on the following exemplary citations:</p> <p>"Embodiments of the present invention relate to a radio resource control RRC message processing method, apparatus, and system. The method includes: setting up, by a first serving node, a connection to a first anchor node, and setting up, by the first anchor node, a connection to a mobility management entity MME; receiving, by the first serving node, a radio resource control RRC message sent by first user equipment UE, where the RRC message includes an RRC message carried by a signaling radio bearer SRB1 or an RRC message carried by an SRB2; and sending, by the first serving node, the RRC message to the first anchor node." Lin '881 at Abs.</p>  <p style="text-align: center;">FIG. 2</p> <p>Lin '881 at FIG. 2; '789 Publication at FIG. 2.</p> |

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |  |                                                                                                                                                                                                                         |
|----------------------------------------------------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Claim Language                                           |  | Exemplary Citations to Lin '881                                                                                                                                                                                         |
|                                                          |  | <p style="text-align: center;"><b>FIG. 4</b></p>  <p style="text-align: center;">Lin '881 at FIG. 4; '789 Publication at FIG. 5.</p> |

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |  |                                                                                                                                                                                                                                                                                                                                                         |
|----------------------------------------------------------|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Claim Language                                           |  | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                         |
|                                                          |  |  <pre> graph TD     301[Receiving unit] --- 303[First processing unit]     301 --- 304[Second processing unit]     303 --- 302[Sending unit]     302 --- 304 </pre> <p style="text-align: center;">FIG. 3</p> <p>Lin '881 at FIG. 3; '789 Publication at FIG. 3.</p> |

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |  |                                                                                                                                                                                     |
|----------------------------------------------------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Claim Language                                           |  | Exemplary Citations to Lin '881                                                                                                                                                     |
|                                                          |  |  <p style="text-align: center;">FIG. 7</p> <p>Lin '881 at FIG. 7; '789 Publication at FIG. 7.</p> |

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| Claim Language                                           |  | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                          |  | <pre> graph TD     801[A first serving node receives an RRC connection request message sent by first UE, where the RRC connection request message is an RRC connection request message that is sent by the first UE to the first serving node after the first UE receives a system message sent by means of broadcast by the first serving node, sends a random access message to the first serving node according to the system message, and receives a random access response message sent by the first serving node] --&gt; 802[The first serving node forwards the RRC connection request message to an first anchor node]     802 --&gt; 803[The first serving node receives an RRC connection setup message sent by the first anchor node, where the RRC connection setup message is the RRC connection setup message generated by the first anchor node according to the received RRC connection request message]     803 --&gt; 804[The first serving node sends the RRC connection setup message to the first UE]     804 --&gt; 805[The first serving node receives an RRC connection setup complete message sent by the first UE]     805 --&gt; 806[The first serving node sends the RRC connection setup complete message to the first anchor node, to set up an RRC connection for the first anchor node and the first UE] </pre> <p style="text-align: center;">FIG. 8</p> <p>Lin '881 at FIG. 8; '789 Publication at FIG. 8.</p> |

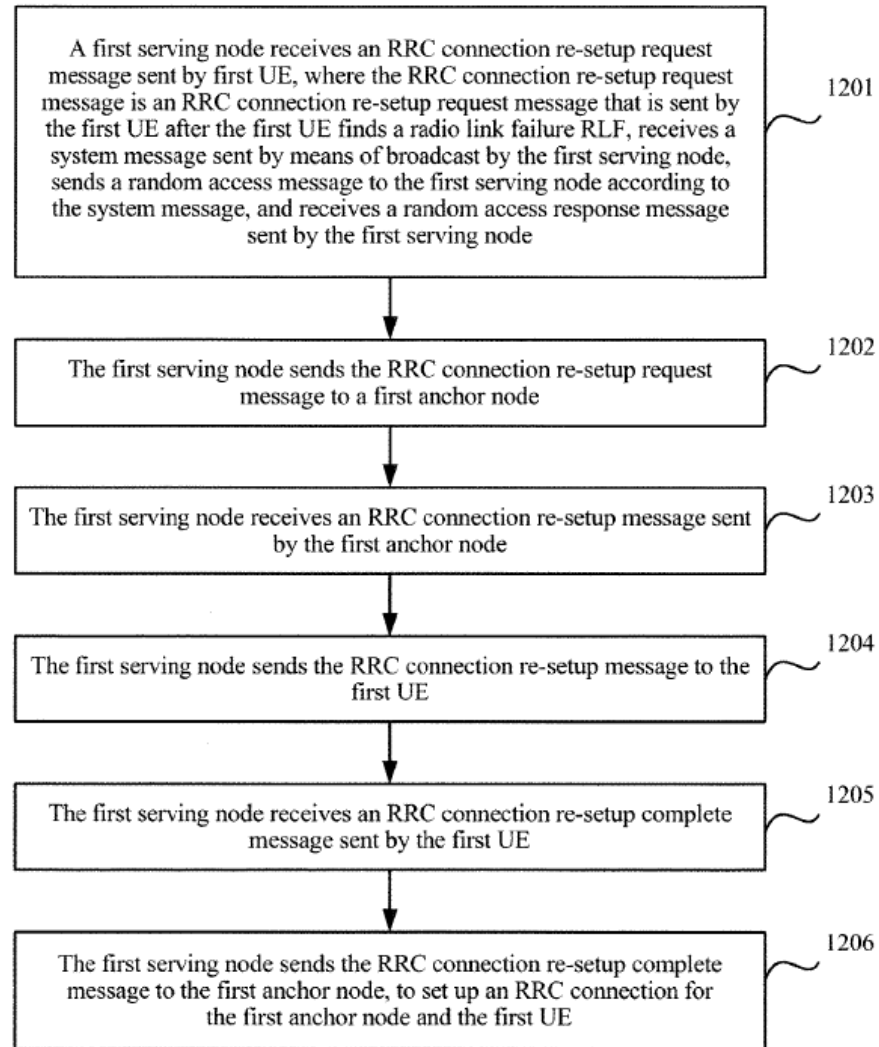


FIG. 12

Lin '881 at FIG. 12; '789 Publication at FIG. 12.

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|----------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Claim Language                                           |                                                                                                                                                                                        | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                          |                                                                                                                                                                                        | <p>“FIG. 3 is a schematic structural diagram of an RRC message processing apparatus according to an embodiment of the present invention. The apparatus is disposed on a serving node. A first serving node sets up a connection to a first anchor node. The first anchor node sets up a connection to a mobility management entity MME.”<br/>Lin '881 at 21:5-10; '789 Publication at 36.</p> <p>To the extent it is found that Lin '881 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lin '881 does not anticipate this claim, Lin '881 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 Lin '881 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.</p> |
| 1[a]                                                     | receiving an uplink radio resource control (RRC) message from a terminal, including the uplink RRC message into a first message, and transmitting the first message to a central unit; | <p>At least under Pegasus's apparent infringement theory, Lin '881 discloses “receiving an uplink radio resource control (RRC) message from a terminal, including the uplink RRC message into a first message, and transmitting the first message to a central unit.” For example, Lin '881 discloses this limitation based on the following exemplary citations:</p> <p>“Therefore, the anchor node 103 has a function of processing the RRC message carried by the SRB1 and the RRC message carried by the SRB2. That is, after receiving the RRC message carried by the SRB1 and the RRC 15 message carried by the SRB2 that are sent by the UE 105, the serving node 104 forwards the RRC messages to the anchor node 103, and the anchor node 103 processes the received RRC message carried by the SRB1 and the received RRC message carried by the SRB2” Lin '881 at 19:11-20; '789 Publication at 39-40.</p>                                                                                                                                                                                                                                                                                                                                    |

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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|                                                          |  | <p>“The processing procedure of the first type of RRC message is a process for processing a dedicated downlink DL RRC message of UE. The DL RRC message includes the RRC message carried by the SRB1 and the RRC message carried by the SRB2. Specifically, after generating the RRC message that is of the UE and carried by the SRB1 or the RRC message that is of the UE and carried by the SRB2, the RRC protocol entity of the anchor node 103 delivers the RRC message, for processing, to the PDCP protocol entity corresponding to the SRB1 or corresponding to the SRB2.” Lin '881 at 19:47-56; '789 Publication at 39-40.</p> <p>“The receiving unit 301 is configured to receive an RRC message sent by first user equipment UE. The RRC message includes an RRC message carried by a signaling radio bearer SRB1 or an RRC message carried by an SRB2.</p> <p>The sending unit 302 is configured to: send the RRC message received by the receiving unit 301 to the first anchor node, so that a first Packet Data Convergence Protocol PDCP layer entity of the first anchor node processes the RRC message carried by the SRB1 and then sends a processed message to an RRC layer entity of the first anchor node, or a second PDCP layer entity of the first anchor node processes the RRC message carried by the SRB2 and then sends a processed message to an RRC layer entity of the first anchor node.” Lin '881 at 21:13-25; '789 Publication at 44.</p> <p>“Step 701: The first serving node receives an RRC message sent by first UE, where the RRC message includes an RRC message carried by a signaling radio bearer SRB1 or an RRC message carried by an SRB2.” Lin '881 at 28:23-26; '789 Publication at 64.</p> <p>“Step 702: The first serving node sends the RRC message to the first anchor node, so that a first PDCP layer entity of the first anchor node processes the RRC message carried by the SRB1 and then sends a processed message to an RRC layer entity of the first anchor node, or a second PDCP layer entity of the first anchor node</p> |

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |  |                                                                                                                                                                                    |
|----------------------------------------------------------|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Claim Language                                           |  | Exemplary Citations to Lin '881                                                                                                                                                    |
|                                                          |  | processes the RRC message carried by the SRB2 and then sends a processed message to an RRC layer entity of the first anchor node.” Lin '881 at 28:66-29:6; '789 Publication at 65. |

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| Claim Language                                           |  | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                          |  | <pre> graph TD     801[A first serving node receives an RRC connection request message sent by first UE, where the RRC connection request message is an RRC connection request message that is sent by the first UE to the first serving node after the first UE receives a system message sent by means of broadcast by the first serving node, sends a random access message to the first serving node according to the system message, and receives a random access response message sent by the first serving node] --&gt; 802[The first serving node forwards the RRC connection request message to an first anchor node]     802 --&gt; 803[The first serving node receives an RRC connection setup message sent by the first anchor node, where the RRC connection setup message is the RRC connection setup message generated by the first anchor node according to the received RRC connection request message]     803 --&gt; 804[The first serving node sends the RRC connection setup message to the first UE]     804 --&gt; 805[The first serving node receives an RRC connection setup complete message sent by the first UE]     805 --&gt; 806[The first serving node sends the RRC connection setup complete message to the first anchor node, to set up an RRC connection for the first anchor node and the first UE] </pre> <p style="text-align: center;">FIG. 8</p> <p>Lin '881 at FIG. 8; '789 Publication at FIG. 8.</p> |

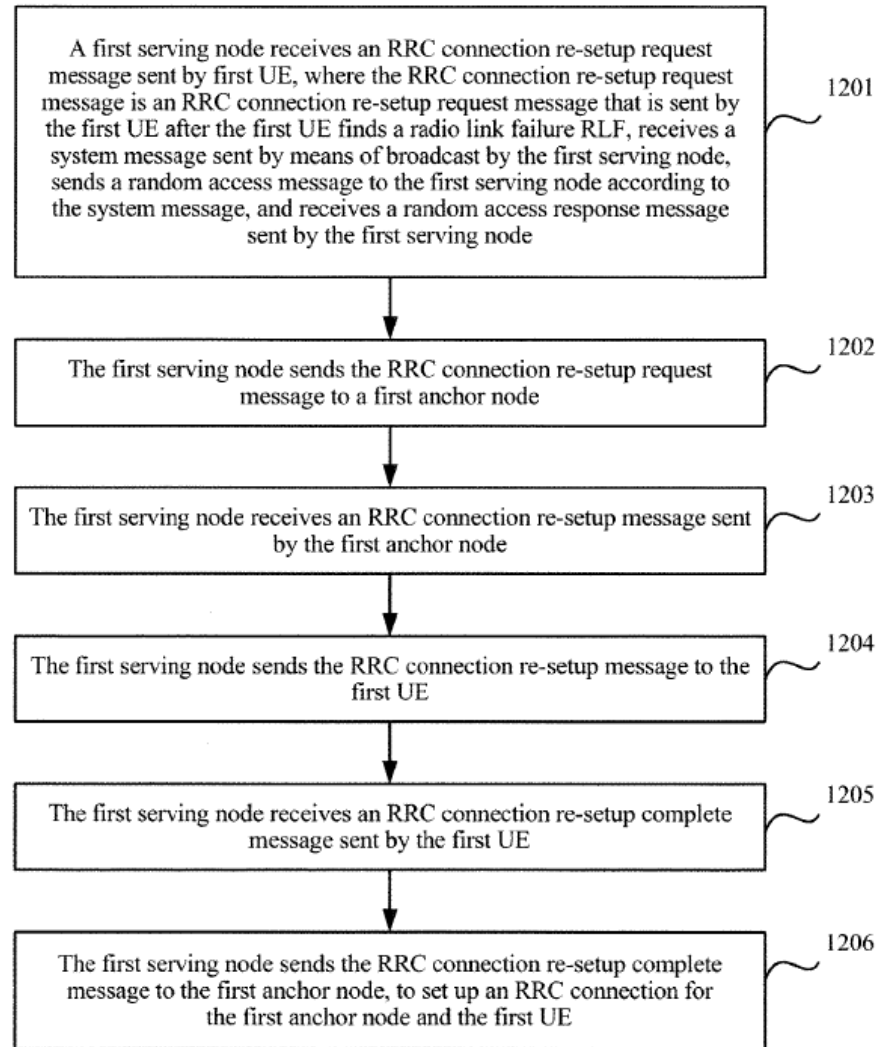


FIG. 12

Lin '881 at FIG. 12; '789 Publication at FIG. 12.

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| Claim Language                                           |                                                                                                                                                                                | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|                                                          |                                                                                                                                                                                | <p>To the extent it is found that Lin '881 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lin '881 does not anticipate this claim, Lin '881 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 Lin '881 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.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 1[b]                                                     | <p>receiving a second message from the central unit, where the second message includes a downlink RRC message in response to the uplink RRC message from the terminal; and</p> | <p>At least under Pegasus's apparent infringement theory, Lin '881 discloses "receiving a second message from the central unit, where the second message includes a downlink RRC message in response to the uplink RRC message from the terminal." For example, Lin '881 discloses this limitation based on the following exemplary citations:</p> <p>"The PDCP protocol entity of the anchor node forms a PDCP PDU, and sends the PDCP PDU to the serving node by using an interface between the anchor node and the serving node." Lin '881 at 19:57-59; '789 Publication at 40-41.</p> <p>"The receiving unit 301 is configured to receive an RRC message sent by first user equipment UE. The RRC message includes an RRC message carried by a signaling radio bearer SRB1 or an RRC message carried by an SRB2.</p> <p>The sending unit 302 is configured to: send the RRC message received by the receiving unit 301 to the first anchor node, so that a first Packet Data Convergence Protocol PDCP layer entity of the first anchor node processes the RRC message carried by the SRB1 and then sends a processed message to an RRC layer entity of the first anchor node, or a second PDCP layer entity of the first anchor node processes the RRC message carried by the SRB2 and then sends a processed message to an RRC layer entity of the first anchor node.</p> |

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| Claim Language                                           |  | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|                                                          |  | <p>Preferably, the receiving unit 301 is further configured to receive an RRC message sent by the first anchor node. The RRC message includes an RRC message carried by an SRB1 or an RRC message carried by an SRB2. The apparatus further includes a first processing unit 303 and a second processing unit 304.” Lin '881 at 21:13-32; '789 Publication at 44-45.</p> <p>“The receiving unit 301 is further configured to receive the RRC connection setup message sent by the first anchor node. The RRC connection setup message is the RRC connection setup message generated by the first anchor node according to the received RRC connection request message.” Lin '881 at 22:63-67; '789 Publication at 48.</p> <p>“Step 702: The first serving node sends the RRC message to the first anchor node, so that a first PDCP layer entity of the first anchor node processes the RRC message carried by the SRB1 and then sends a processed message to an RRC layer entity of the first anchor node, or a second PDCP layer entity of the first anchor node processes the RRC message carried by the SRB2 and then sends a processed message to an RRC layer entity of the first anchor node.” Lin '881 at 28:66-29:6; '789 Publication at 65.</p> |

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| Claim Language                                           |  | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                          |  | <pre> graph TD     801[A first serving node receives an RRC connection request message sent by first UE, where the RRC connection request message is an RRC connection request message that is sent by the first UE to the first serving node after the first UE receives a system message sent by means of broadcast by the first serving node, sends a random access message to the first serving node according to the system message, and receives a random access response message sent by the first serving node] --&gt; 802[The first serving node forwards the RRC connection request message to an first anchor node]     802 --&gt; 803[The first serving node receives an RRC connection setup message sent by the first anchor node, where the RRC connection setup message is the RRC connection setup message generated by the first anchor node according to the received RRC connection request message]     803 --&gt; 804[The first serving node sends the RRC connection setup message to the first UE]     804 --&gt; 805[The first serving node receives an RRC connection setup complete message sent by the first UE]     805 --&gt; 806[The first serving node sends the RRC connection setup complete message to the first anchor node, to set up an RRC connection for the first anchor node and the first UE] </pre> <p style="text-align: center;">FIG. 8</p> <p>Lin '881 at FIG. 8; '789 Publication at FIG. 8.</p> |

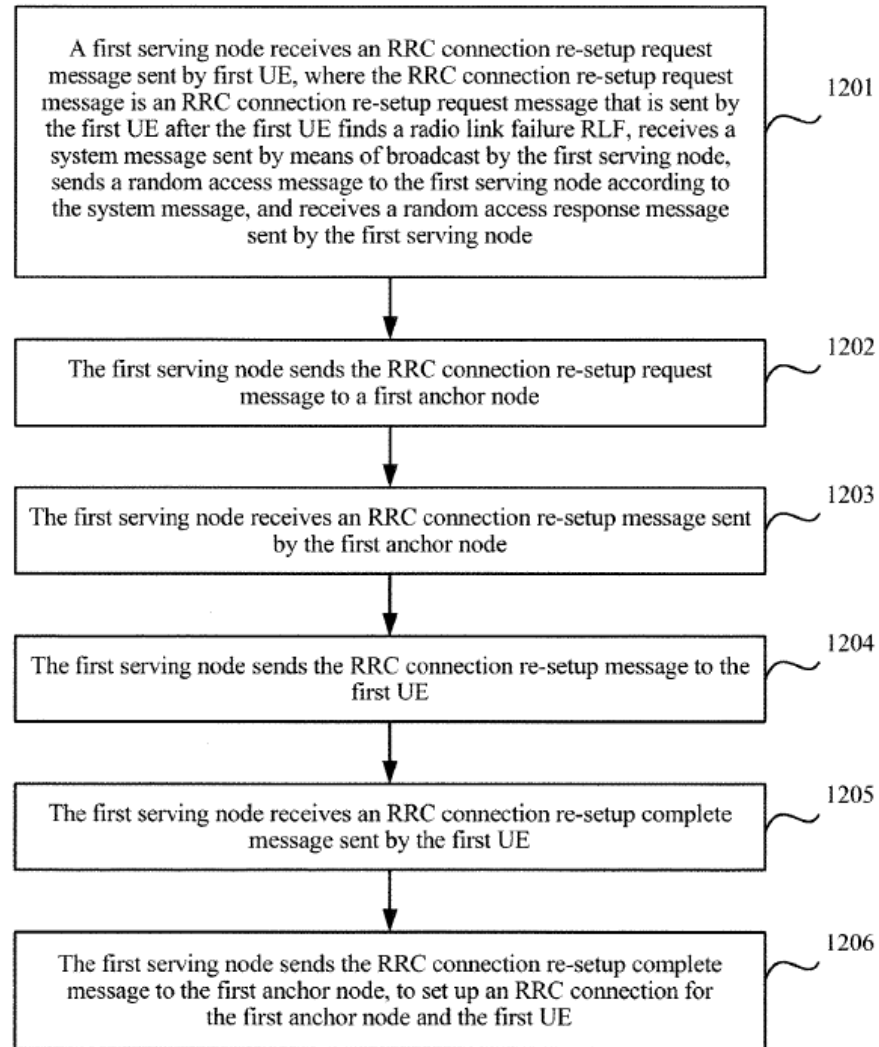


FIG. 12

Lin '881 at FIG. 12; '789 Publication at FIG. 12.

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------------------------------------------------------|--------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Claim Language                                           |                                                        | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|                                                          |                                                        | <p>To the extent it is found that Lin '881 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lin '881 does not anticipate this claim, Lin '881 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 Lin '881 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.</p>                                              |
| 1[c]                                                     | transmitting the downlink RRC message to the terminal, | <p>At least under Pegasus's apparent infringement theory, Lin '881 discloses "transmitting the downlink RRC message to the terminal." For example, Lin '881 discloses this limitation based on the following exemplary citations:</p> <p>"After receiving the PDCP PDU, the serving node parses the PDCP PDU. Then, the RLC protocol entity that is of the serving node and corresponding to the SRB1 or the SRB2 processes the PDCP PDU. After the RLC protocol entity of the serving node processes the PDCP PDU, the MAC layer and the PHY layer of the serving node process a processed PDCP PDU and then sends a processed PDCP PDU to the UE." Lin '881 at 19:60-67; '789 Publication at 40-41.</p> <p>"The sending unit 302 is further configured to send the RRC connection setup message received by the receiving unit 301 to the first UE." Lin '881 at 23:1-3; '789 Publication at 48.</p> |

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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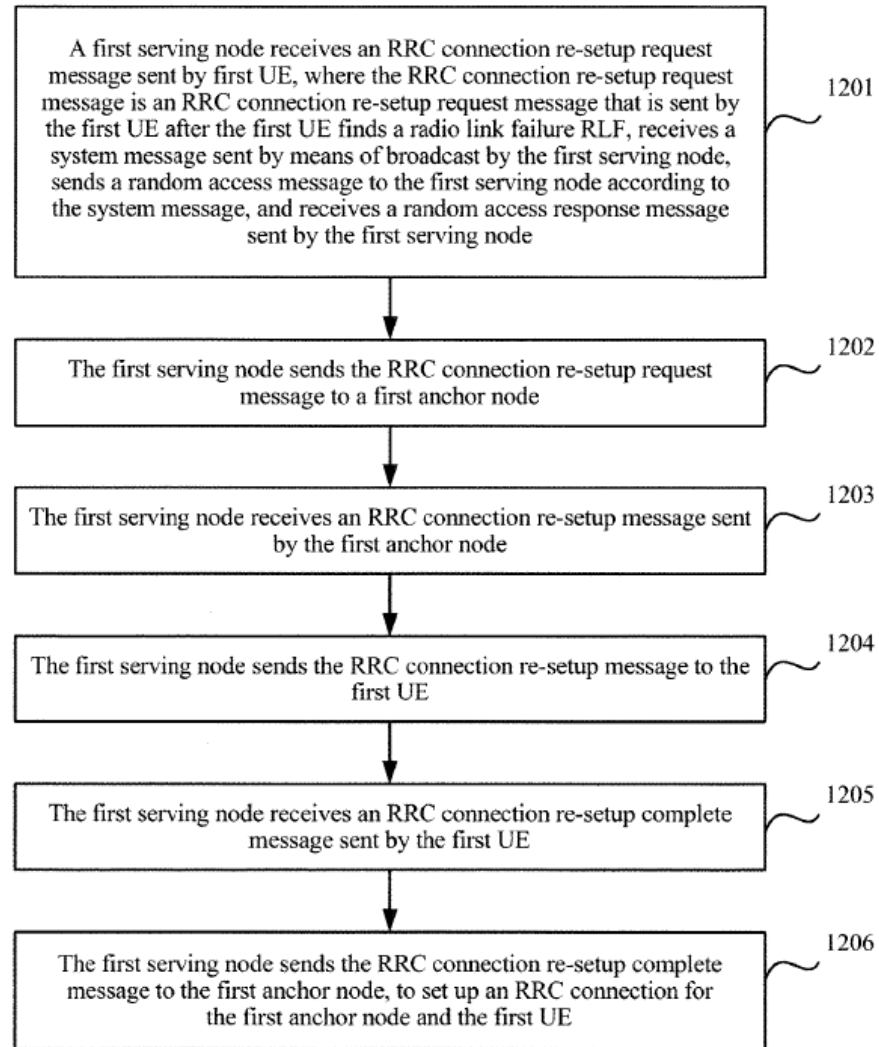


FIG. 12

Lin '881 at FIG. 12; '789 Publication at FIG. 12.

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| Claim Language                                           |                                                                                                                                                                                                | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                                                          |                                                                                                                                                                                                | <p>To the extent it is found that Lin '881 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lin '881 does not anticipate this claim, Lin '881 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 Lin '881 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.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 1[d]                                                     | <p>wherein the access unit and the central unit distinguish signaling radio bearers based on radio bearer identification information-included in the first message and the second message.</p> | <p>At least under Pegasus's apparent infringement theory, Lin '881 discloses "wherein the access unit and the central unit distinguish signaling radio bearers based on radio bearer identification information-included in the first message and the second message." For example, Lin '881 discloses this limitation based on the following exemplary citations:</p> <p>"Specifically, after generating the RRC message that is of the UE and carried by the SRB1 or the RRC message that is of the UE and carried by the SRB2, the RRC protocol entity of the anchor node 103 delivers the RRC message, for processing, to the PDCP protocol entity corresponding to the SRB1 or corresponding to the SRB2." Lin '881 at 19:51-56; '789 Publication at 40-41.</p> <p>"Then, the RLC protocol entity that is of the serving node and corresponding to the SRB1 or the SRB2 processes the PDCP PDU." Lin '881 at 19:61:63; '789 Publication at 40-41.</p> <p>"Preferably, the RRC message further includes an RRC message carried by an SRB0. The sending unit 302 is further configured to send first indication information to the first anchor node. The first indication information is used by the first anchor node to identify, according to the first indication information, that the RRC message is the RRC message carried by the SRB0, and to perform processing by using the RRC</p> |

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|----------------------------------------------------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Claim Language                                           |  | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|                                                          |  | <p>layer entity of the first anchor node. The receiving unit 301 is further configured to receive first indication information sent by the first anchor node. The first indication information is used by the first serving node to identify, according to the first indication information, that the RRC message is the RRC message carried by the SRB0, and to perform processing by using an RRC layer entity of the first serving node.</p> <p>Preferably, the sending unit 302 is further configured to send second indication information to the first anchor node. The second indication information is used by the first anchor node to identify, according to the second indication information, that the RRC message is the RRC message carried by the SRB1. The receiving unit 301 is further configured to receive second indication information sent by the first anchor node. The second indication information is used by the first serving node to identify, according to the second indication information, that the RRC message is the RRC message carried by the SRB1.</p> <p>Preferably, the sending unit 302 is further configured to send third indication information to the first anchor node. The third indication information is used by the first anchor node to identify, according to the third indication information, that the RRC message is the RRC message carried by the SRB2. The receiving unit 301 is further configured to receive third indication information sent by the first anchor node. The third indication information is used by the first serving node to identify, according to the third indication information, that the RRC message is the RRC message carried by the SRB2.” Lin '881 at 21:48-22:18; '789 Publication at 45-46.</p> <p>To the extent it is found that Lin '881 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lin '881 does not anticipate this claim, Lin '881 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 Lin '881 with any of</p> |

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |  |                                                                                                                                                                                                                                                                                                                        |
|----------------------------------------------------------|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Claim Language                                           |  | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                        |
|                                                          |  | 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. Claim 2

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| Claim Language                                           |                                                                                                                                                                                               | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 2[pre]                                                   | The method according to claim 1, wherein the access unit comprises a node configured to provide an RLC function, a MAC function, and a PHY function, for transmission of user plane data, and | <p>At least under Pegasus's apparent infringement theory, Lin '881 discloses "The method according to claim 1, wherein the access unit comprises a node configured to provide an RLC function, a MAC function, and a PHY function, for transmission of user plane data, and." For example, Lin '881 discloses this limitation based on the following exemplary citations:</p> <p>"In this embodiment of the present invention, the serving node 104 does not independently process RRC messages, but the anchor node 103 and the serving node 104 jointly process the RRC messages. That is, depending on types of the RRC messages, the anchor node 103 processes some RRC messages, and the serving node 104 processes remaining RRC messages, so that an RRC function is split onto the two nodes. Specifically, the anchor node 103 may include an RRC protocol entity used to process an RRC message carried by an SRB1 and an RRC protocol entity used to process an RRC message carried by an SRB2, a first Packet Data Convergence Protocol (PDCP, Packet Data Convergence Protocol) protocol entity used to process the RRC message carried by the SRB1, and a second PDCP protocol entity used to process the RRC message carried by the SRB2." Lin '881 at 18:63-19:11; '789 Publication at 39-40.</p> <p>"The serving node 104 includes an RLC protocol entity used to process data carried by a data radio bearer DRB, a Media Access Control MAC protocol entity used to process the RRC message carried by the SRB1, and a physical layer PHY protocol</p> |

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| Claim Language                                           |                                                                                                                   | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|                                                          |                                                                                                                   | <p>entity used to process the RRC message carried by the SRB2, and an RRC protocol entity used to process an RRC message carried by an SRB0.” Lin '881 at 19:20-27; '789 Publication at 39-40.</p> <p>“In addition, the processing, by a first RLC layer entity of the first serving node, the RRC message carried by the SRB1 and then sending a processed message to the first UE; or processing, by a second RLC layer entity of the first serving node, the RRC message carried by the SRB2 and then sending a processed message to the first UE may specifically include: processing, by the first RLC layer entity of the first serving node, the RRC message carried by the SRB1 and then sending the processed message to the first UE by using a Media Access Control MAC layer and a physical layer; or processing, by the second RLC layer entity of the first serving node, the RRC message carried by the SRB2 and then sending the processed message to the first UE by using a MAC layer and a physical layer.” Lin '881 at 30:32-45; '789 Publication at 68-69.</p> <p>To the extent it is found that Lin '881 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lin '881 does not anticipate this claim, Lin '881 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 Lin '881 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.</p> |
| 2[a]                                                     | the central unit comprises a node configured to provide a PDCP function, for transmission of the user plane data. | At least under Pegasus’s apparent infringement theory, Lin '881 discloses “the central unit comprises a node configured to provide a PDCP function, for transmission of the user plane data.” For example, Lin '881 discloses this limitation based on the following exemplary citations:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| Claim Language                                           |  | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                                          |  | <p>“Specifically, after generating the RRC message that is of the UE and carried by the SRB1 or the RRC message that is of the UE and carried by the SRB2, the RRC protocol entity of the anchor node 103 delivers the RRC message, for processing, to the PDCP protocol entity corresponding to the SRB1 or corresponding to the SRB2. The PDCP protocol entity of the anchor node forms a PDCP PDU, and sends the PDCP PDU to the serving node by using an interface between the anchor node and the serving node.” Lin '881 at 19:54-59; '789 Publication at 40-41.</p> <p>“In this embodiment of the present invention, that the first PDCP layer entity of the first anchor node processes the RRC message carried by the SRB1 and then sends the processed message to the RRC layer entity specifically includes: The first PDCP layer entity of the first anchor node processes the RRC message carried by the SRB1, to obtain a PDCP PDU that includes the RRC message carried by the SRB1; and sends, to the RRC layer entity, the PDCP PDU that includes the RRC message carried by the SRB1.” Lin '881 at 29:34-42; '789 Publication at 66.</p> <p>To the extent it is found that Lin '881 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lin '881 does not anticipate this claim, Lin '881 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 Lin '881 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.</p> |

### 3. Claim 4

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| Claim Language                                           |                                                                                                                                                                                         | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 4[a]                                                     | The method according to claim 1, wherein the second message comprises at least one of an RRC connection setup message, a C-RNTI, and signaling radio bearer identification information. | <p>At least under Pegasus's apparent infringement theory, Lin '881 discloses "The method according to claim 1, wherein the second message comprises at least one of an RRC connection setup message, a C-RNTI, and signaling radio bearer identification information." For example, Lin '881 discloses this limitation based on the following exemplary citations:</p> <p>"Therefore, the serving node 104 has a function of processing the RRC message carried by the SRB0 and is responsible for processing a system broadcast message of a BCCH service, a cell paging message of a PCCH service, and optionally, some RRC messages such as an RRC connection request message and an RRC connection setup message of a CCCH service in an RRC connection setup process and an RRC connection re-setup process of UE." Lin '881 at 19:30-41; '789 Publication at 39-40.</p> <p>"Preferably, the RRC message further includes an RRC message carried by an SRB0. The RRC message carried by the SRB0 is specifically an RRC connection request message or an RRC connection setup message. The RRC message carried by the SRB1 is specifically an RRC connection setup complete message." Lin '881 at 22:44-49; '789 Publication at 48.</p> <p>"The receiving unit 301 is further configured to receive the RRC connection setup complete message sent by the first UE.</p> <p>The sending unit 302 is further configured to send the RRC connection setup complete message received by the receiving unit 301 to the first anchor node, to set up an RRC connection for the first anchor node and the first UE.</p> <p>Preferably, the RRC message carried by the SRB1 is specifically an RRC connection reconfiguration message or an RRC connection reconfiguration complete message." Lin '881 at 23:4-13; '789 Publication at 48.</p> |

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| Claim Language                                           |  | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|                                                          |  | <p>To the extent it is found that Lin '881 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lin '881 does not anticipate this claim, Lin '881 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 Lin '881 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.</p> |

#### 4. Claim 8

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| Claim Language                                           |                                                                                 | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 8[pre]                                                   | An access unit for configuring a wireless connection of a terminal, comprising: | <p>To the extent the preamble is limiting, at least under Pegasus's apparent infringement theory, Lin '881 discloses "An access unit for configuring a wireless connection of a terminal, comprising." For example, Lin '881 discloses this limitation based on the following exemplary citations:</p> <p><i>See</i> 1[pre]</p> <p>To the extent it is found that Lin '881 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lin '881 does not anticipate this claim, Lin '881 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 Lin '881 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</p> |

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| Claim Language                                           |                                                                                                                                                                                            | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|                                                          |                                                                                                                                                                                            | elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 8[a]                                                     | a transmitter configured to transmit a first message to a central unit, where the first message includes an uplink RRC message received from a terminal; and                               | <p>At least under Pegasus's apparent infringement theory, Lin '881 discloses "a transmitter configured to transmit a first message to a central unit, where the first message includes an uplink RRC message received from a terminal; and." For example, Lin '881 discloses this limitation based on the following exemplary citations:</p> <p><i>See</i> 1[a]</p> <p>To the extent it is found that Lin '881 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lin '881 does not anticipate this claim, Lin '881 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 Lin '881 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.</p> |
| 8[b]                                                     | a receiver configured to receive a second message from the central unit, where the second message includes a downlink RRC message in response to the uplink RRC message from the terminal, | <p>At least under Pegasus's apparent infringement theory, Lin '881 discloses "a receiver configured to receive a second message from the central unit, where the second message includes a downlink RRC message in response to the uplink RRC message from the terminal." For example, Lin '881 discloses this limitation based on the following exemplary citations:</p> <p><i>See</i> 1[b]</p> <p>To the extent it is found that Lin '881 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lin '881 does not</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| Claim Language                                           |                                                                                                                                                   | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                          |                                                                                                                                                   | anticipate this claim, Lin '881 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 Lin '881 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 8[c]                                                     | wherein the transmitter transmits the downlink RRC message to the terminal, and                                                                   | <p>At least under Pegasus's apparent infringement theory, Lin '881 discloses "wherein the transmitter transmits the downlink RRC message to the terminal, and." For example, Lin '881 discloses this limitation based on the following exemplary citations:</p> <p><i>See 1[c]</i></p> <p>To the extent it is found that Lin '881 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lin '881 does not anticipate this claim, Lin '881 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 Lin '881 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.</p> |
| 8[d]                                                     | wherein the access unit and the central unit distinguish signaling radio bearers based on radio bearer identification information included in the | At least under Pegasus's apparent infringement theory, Lin '881 discloses "wherein the access unit and the central unit distinguish signaling radio bearers based on radio bearer identification information included in the first message and the second message." For example, Lin '881 discloses this limitation based on the following exemplary citations:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| Claim Language                                           |                                       | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                          | first message and the second message. | <p><i>See</i> 1[d]</p> <p>To the extent it is found that Lin '881 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lin '881 does not anticipate this claim, Lin '881 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 Lin '881 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.</p> |

## 5. Claim 9

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Claim Language                                           |                                                                                                                                                                                                    | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 9[pre]                                                   | The access unit according to claim 8, wherein the access unit comprises a node configured to provide an RLC function, a MAC function, and a PHY function, for transmission of user plane data, and | <p>At least under Pegasus's apparent infringement theory, Lin '881 discloses "The access unit according to claim 8, wherein the access unit comprises a node configured to provide an RLC function, a MAC function, and a PHY function, for transmission of user plane data, and." For example, Lin '881 discloses this limitation based on the following exemplary citations:</p> <p><i>See</i> 2[pre]</p> <p>To the extent it is found that Lin '881 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lin '881 does not anticipate this claim, Lin '881 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</p> |

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Claim Language                                           |                                                                                                                   | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                                                          |                                                                                                                   | ordinary skill in the art would have been motivated to combine Lin '881 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 9[a]                                                     | the central unit comprises a node configured to provide a PDCP function, for transmission of the user plane data. | <p>At least under Pegasus's apparent infringement theory, Lin '881 discloses "the central unit comprises a node configured to provide a PDCP function, for transmission of the user plane data." For example, Lin '881 discloses this limitation based on the following exemplary citations:</p> <p><i>See 2[a]</i></p> <p>To the extent it is found that Lin '881 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lin '881 does not anticipate this claim, Lin '881 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 Lin '881 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.</p> |

## 6. Claim 11

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |                                                                                         |                                                                                                                                                                                                                                             |
|----------------------------------------------------------|-----------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Claim Language                                           |                                                                                         | Exemplary Citations to Lin '881                                                                                                                                                                                                             |
| 11[a]                                                    | The access unit according to claim 8, wherein the second message comprises at least one | At least under Pegasus's apparent infringement theory, Lin '881 discloses "The access unit according to claim 8, wherein the second message comprises at least one of an RRC connection setup message, a C-RNTI, and signaling radio bearer |

| Invalidity of U.S. Patent 10,616,932 in view of Lin '881 |                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------------------------------------|------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Claim Language                                           |                                                                                                      | Exemplary Citations to Lin '881                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                          | of an RRC connection setup message, a C-RNTI, and signaling radio bearer identification information. | <p>identification information.” For example, Lin '881 discloses this limitation based on the following exemplary citations:</p> <p><i>See</i> 4[a]</p> <p>To the extent it is found that Lin '881 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Lin '881 does not anticipate this claim, Lin '881 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 Lin '881 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.</p> |