

EXHIBIT C-2

Summary of Invalidity Analysis of U.S. Patent No. 10,616,932 (“’932 Patent”) in view of U.S. Patent No. 9,807,752 to Zhang et al. (“Zhang ’752”)

U.S. Patent No. 9,807,752 to Zhang et al. (“Zhang ’752”), published on October 31, 2017 and claims priority to PCT Application No. PCT/CN2013/071776 filed February 2, 2013 and published as WO 2014/127525 on August 28, 2014 (the “’525 Publication”). The ’525 Publication supports at least Claim 1 of Zhang ’752. By way of example only, at least the following disclosures of the ’525 Publication are sufficient to support Claim 1 of Zhang ’752. *See, e.g.*, ’525 Publication at FIG. 13, 29, 53-54, 59, 60, 61. Therefore, Zhang ’752 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 Zhang ’752.

To the extent that Zhang ’752 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 Zhang ’752 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 Zhang ’752 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 Zhang '752		
Claim Language		Exemplary Citations to Zhang '752
1[pre]	A method of configuring, by an access unit, a wireless connection of a terminal, the method comprising:	To the extent the preamble is limiting, at least under Pegasus's apparent infringement theory, Zhang '752 discloses "A method of configuring, by an access unit, a wireless connection of a terminal, the method comprising." For example, Zhang '752 discloses this limitation based on the following exemplary citations: "The present invention discloses a communication method, including: sending, by a user equipment, a request message to a micro network node, so that the micro network node sends an indication message to a macro network node; receiving an uplink resource (UG) sent according to the indication message by the macro network node; and sending uplink signaling or uplink data to the macro network node according to the uplink resource (UG). Embodiments of the present invention further provide a corresponding device and system. In technical solutions of the present invention, the micro network node participates in accessing the user equipment to a network, so that a UE can rapidly access the network, which reduces an access delay of the UE." Zhang '752 at Abs.; '525 Publication at Abs.

Invalidity of U.S. Patent 10,616,932 in view of Zhang '752		
Claim Language		Exemplary Citations to Zhang '752
		<pre> sequenceDiagram participant UE as User equipment participant MN as Macro network node participant MNC as Micro network node MN->>UE: S700. Sixth configuration message (eleventh control information) MN->>MNC: S705. Seventh configuration message (twelfth control information) UE->>MNC: S710. Uplink signaling or data UE->>MN: S715. Uplink signaling or data MNC->>MN: S720. Uplink signaling or data Note over MN: S725. Process duplicate signaling or data MN->>UE: S730. Downlink signaling or data MN->>MNC: S735. Downlink signaling or data MNC->>UE: S740. Downlink signaling or data Note over UE: S745. Process duplicate signaling or data </pre> FIG. 13 Zhang '752 at FIG. 13; '525 Publication at FIG. 13. To the extent it is found that Zhang '752 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Zhang '752 does not anticipate this claim, Zhang '752 renders it obvious, either alone, in combination with

Invalidity of U.S. Patent 10,616,932 in view of Zhang '752		
Claim Language		Exemplary Citations to Zhang '752
		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 Zhang '752 with any of the other prior art references identified in the cover pleading or herein with a reasonable expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.
1[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;	At least under Pegasus's apparent infringement theory, Zhang '752 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, Zhang '752 discloses this limitation based on the following exemplary citations: "S710: The user equipment sends uplink signaling or uplink data to the micro network node. Specifically, the user equipment sends, to the micro network node, uplink signaling or uplink data transmitted on the radio bearer corresponding to the identity of the radio bearer (RB), where the uplink signaling or uplink data is sent through a micro cell corresponding to the identity of the micro cell." Zhang '752 at 50:40-47; '525 Publication at 59. "In the embodiment of the present invention, the uplink signaling may be an unlink radio resource control (Radio Resource Control, RRC) message, and the uplink RRC message includes a measurement report (Measurement Report, MR) message, an uplink information transfer (Uplink Information Transfer, UIT) message, and the like." Zhang '752 at 50:51-56; '525 Publication at 59-60. "The micro network node forwards, to the macro network node, the uplink signaling or uplink data sent by the user equipment." Zhang '752 at 50:59-62; '525 Publication at 60.

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Claim Language		Exemplary Citations to Zhang '752
		<pre> sequenceDiagram participant UE as User equipment participant MN as Macro network node participant MNC as Micro network node Note over UE, MN: S700. Sixth configuration message (eleventh control information) Note over MN, MNC: S705. Seventh configuration message (twelfth control information) Note over UE, MNC: S710. Uplink signaling or data Note over UE, MN: S715. Uplink signaling or data Note over MN, MNC: S720. Uplink signaling or data Note over MN: S725. Process duplicate signaling or data Note over UE, MN: S730. Downlink signaling or data Note over MN, MNC: S735. Downlink signaling or data Note over UE, MNC: S740. Downlink signaling or data Note over UE: S745. Process duplicate signaling or data </pre> FIG. 13 Zhang '752 at FIG. 13; '525 Publication at FIG. 13. To the extent it is found that Zhang '752 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Zhang '752 does not anticipate this claim, Zhang '752 renders it obvious, either alone, in combination with

Invalidity of U.S. Patent 10,616,932 in view of Zhang '752		
Claim Language		Exemplary Citations to Zhang '752
		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 Zhang '752 with any of the other prior art references identified in the cover pleading or herein with a reasonable expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.
1[b]	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	At least under Pegasus's apparent infringement theory, Zhang '752 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, Zhang '752 discloses this limitation based on the following exemplary citations: "S735: The macro network node sends downlink signaling or downlink data to the micro network node." Zhang '752 at 51:15-16; '525 Publication at 60. "In the embodiment of the present invention, the downlink signaling may be a downlink radio resource control (RRC) message, and the downlink RRC message includes a handover command (Handover Command, HC) message, a downlink information transfer (Downlink Information Transfer, DIT) message, and the like." Zhang '752 at 51:9-14; '525 Publication at 59-60.

Invalidity of U.S. Patent 10,616,932 in view of Zhang '752		
Claim Language		Exemplary Citations to Zhang '752
		<pre> sequenceDiagram participant UE as User equipment participant MN as Macro network node participant MNC as Micro network node MN->>UE: S700. Sixth configuration message (eleventh control information) MN->>MNC: S705. Seventh configuration message (twelfth control information) UE->>MNC: S710. Uplink signaling or data UE->>MN: S715. Uplink signaling or data MNC->>MN: S720. Uplink signaling or data Note over MN: S725. Process duplicate signaling or data MN->>UE: S730. Downlink signaling or data MN->>MNC: S735. Downlink signaling or data MNC->>UE: S740. Downlink signaling or data Note over UE: S745. Process duplicate signaling or data </pre> FIG. 13 Zhang '752 at FIG. 13; '525 Publication at FIG. 13. To the extent it is found that Zhang '752 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Zhang '752 does not anticipate this claim, Zhang '752 renders it obvious, either alone, in combination with

Invalidity of U.S. Patent 10,616,932 in view of Zhang '752		
Claim Language		Exemplary Citations to Zhang '752
		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 Zhang '752 with any of the other prior art references identified in the cover pleading or herein with a reasonable expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.
1[c]	transmitting the downlink RRC message to the terminal,	At least under Pegasus's apparent infringement theory, Zhang '752 discloses "transmitting the downlink RRC message to the terminal." For example, Zhang '752 discloses this limitation based on the following exemplary citations: "S740: The micro network node forwards, to the user equipment, the downlink signaling or downlink data sent by the macro network node. Specifically, the micro network node sends, to the user equipment, downlink signaling or downlink data transmitted on the radio bearer corresponding to the identity of the radio bearer (RB)" Zhang '752 at 51:17-22; '525 Publication at 60.

Invalidity of U.S. Patent 10,616,932 in view of Zhang '752		
Claim Language		Exemplary Citations to Zhang '752
		<pre> sequenceDiagram participant UE as User equipment participant MN as Macro network node participant MNC as Micro network node MN->>UE: S700. Sixth configuration message (eleventh control information) MN->>MNC: S705. Seventh configuration message (twelfth control information) UE->>MNC: S710. Uplink signaling or data UE->>MN: S715. Uplink signaling or data MNC->>MN: S720. Uplink signaling or data Note over MN: S725. Process duplicate signaling or data MN->>UE: S730. Downlink signaling or data MN->>MNC: S735. Downlink signaling or data MNC->>UE: S740. Downlink signaling or data Note over UE: S745. Process duplicate signaling or data </pre> FIG. 13 Zhang '752 at FIG. 13; '525 Publication at FIG. 13. To the extent it is found that Zhang '752 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Zhang '752 does not anticipate this claim, Zhang '752 renders it obvious, either alone, in combination with

Invalidity of U.S. Patent 10,616,932 in view of Zhang '752		
Claim Language		Exemplary Citations to Zhang '752
		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 Zhang '752 with any of the other prior art references identified in the cover pleading or herein with a reasonable expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.
1[d]	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.	At least under Pegasus's apparent infringement theory, Zhang '752 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, Zhang '752 discloses this limitation based on the following exemplary citations: "S700: A macro network node sends a sixth configuration message to a user equipment, where the sixth configuration message carries configuration information. The configuration information includes an identity of a micro cell controlled by a micro network node and an identity of a radio bearer (RB) of the user equipment." Zhang '752 at 50:17-22; '525 Publication at 59. "S710: The user equipment sends uplink signaling or uplink data to the micro network node. Specifically, the user equipment sends, to the micro network node, uplink signaling or uplink data transmitted on the radio bearer corresponding to the identity of the radio bearer (RB), where the uplink signaling or uplink data is sent through a micro cell corresponding to the identity of the micro cell." Zhang '752 at 50:40-47; '525 Publication at 59. "S740: The micro network node forwards, to the user equipment, the downlink signaling or downlink data sent by the macro network node.

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Claim Language		Exemplary Citations to Zhang '752
		Specifically, the micro network node sends, to the user equipment, downlink signaling or downlink data transmitted on the radio bearer corresponding to the identity of the radio bearer (RB)” Zhang '752 at 51:17-22; '525 Publication at 60. “For still another example, when the second control information includes an identity of a radio bearer (RB), and values of the identity of the radio bearer (RB) are “SRB 1” and “DRB 2”, the third control information determined by the user equipment is the identity of the radio bearer (RB) of the uplink signaling or uplink data; when the value of the identity of the radio bearer (RB) of the uplink signaling or uplink data is “SRB 1” or “DRB 2”, the user equipment may send the request message.” Zhang '752 at 45:60-46:1; '525 Publication at 53-54. To the extent it is found that Zhang '752 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Zhang '752 does not anticipate this claim, Zhang '752 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 Zhang '752 with any of the other prior art references identified in the cover pleading or herein with a reasonable expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.

2. Claim 2

Invalidity of U.S. Patent 10,616,932 in view of Zhang '752		
Claim Language		Exemplary Citations to Zhang '752
2[pre]	The method according to claim 1, wherein the access unit comprises a node configured to provide an RLC function, a	At least under Pegasus’s apparent infringement theory, Zhang '752 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

Invalidity of U.S. Patent 10,616,932 in view of Zhang '752		
Claim Language		Exemplary Citations to Zhang '752
	MAC function, and a PHY function, for transmission of user plane data, and	user plane data, and.” For example, Zhang '752 discloses this limitation based on the following exemplary citations: “A micro network node may be a relay node (Relay Node, RN), a home base station (Home eNB or Home NB), a micro base station (Micro eNB), a pico base station (Pico eNB), a femto base station (Femto eNB), a WiFi access point (Access Point, AP), or the like.” Zhang '752 at 25:31-35; '525 Publication at 29. To the extent it is found that Zhang '752 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Zhang '752 does not anticipate this claim, Zhang '752 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 Zhang '752 with any of the other prior art references identified in the cover pleading or herein with a reasonable expectation of success because each of these references contains familiar elements within the same field of endeavor to address the same known problems, according to known methods which would yield predictable results.
2[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, Zhang '752 discloses “the central unit comprises a node configured to provide a PDCP function, for transmission of the user plane data.” For example, Zhang '752 discloses this limitation based on the following exemplary citations: “A macro network node may be an evolved base station (evolved NodeB, eNB), and may also be a base station (Node B, NB), a donor base station (Donor eNB, DeNB), a HeNB gateway, an HNB gateway, or the like.” Zhang '752 at 25:37-41; '525 Publication at 29. To the extent it is found that Zhang '752 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Zhang '752 does not anticipate this claim, Zhang '752 renders it obvious, either alone, in combination with

Invalidity of U.S. Patent 10,616,932 in view of Zhang '752		
Claim Language		Exemplary Citations to Zhang '752
		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 Zhang '752 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.

3. Claim 4

Invalidity of U.S. Patent 10,616,932 in view of Zhang '752		
Claim Language		Exemplary Citations to Zhang '752
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.	At least under Pegasus's apparent infringement theory, Zhang '752 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, Zhang '752 discloses this limitation based on the following exemplary citations: "In the embodiment of the present invention, the downlink signaling may be a downlink radio resource control (RRC) message, and the downlink RRC message includes a handover command (Handover Command, HC) message, a downlink information transfer (Downlink Information Transfer, DIT) message, and the like." Zhang '752 at 51:7-14; '525 Publication at 60. To the extent it is found that Zhang '752 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Zhang '752 does not anticipate this claim, Zhang '752 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 Zhang '752 with any of the other prior art references identified in the cover pleading or herein with a

Invalidity of U.S. Patent 10,616,932 in view of Zhang '752		
Claim Language		Exemplary Citations to Zhang '752
		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.

4. Claim 8

Invalidity of U.S. Patent 10,616,932 in view of Zhang '752		
Claim Language		Exemplary Citations to Zhang '752
8[pre]	An access unit for configuring a wireless connection of a terminal, comprising:	To the extent the preamble is limiting, at least under Pegasus's apparent infringement theory, Zhang '752 discloses "An access unit for configuring a wireless connection of a terminal, comprising." For example, Zhang '752 discloses this limitation based on the following exemplary citations: <i>See</i> 1[pre] To the extent it is found that Zhang '752 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Zhang '752 does not anticipate this claim, Zhang '752 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 Zhang '752 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[a]	a transmitter configured to transmit a first message to a central unit, where the first message includes an uplink	At least under Pegasus's apparent infringement theory, Zhang '752 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, Zhang '752 discloses this limitation based on the following exemplary citations:

Invalidity of U.S. Patent 10,616,932 in view of Zhang '752		
Claim Language		Exemplary Citations to Zhang '752
	RRC message received from a terminal; and	<i>See</i> 1[a] To the extent it is found that Zhang '752 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Zhang '752 does not anticipate this claim, Zhang '752 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 Zhang '752 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[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,	At least under Pegasus's apparent infringement theory, Zhang '752 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, Zhang '752 discloses this limitation based on the following exemplary citations: <i>See</i> 1[b] To the extent it is found that Zhang '752 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Zhang '752 does not anticipate this claim, Zhang '752 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 Zhang '752 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.

Invalidity of U.S. Patent 10,616,932 in view of Zhang '752		
Claim Language		Exemplary Citations to Zhang '752
8[c]	wherein the transmitter transmits the downlink RRC message to the terminal, and	At least under Pegasus's apparent infringement theory, Zhang '752 discloses "wherein the transmitter transmits the downlink RRC message to the terminal, and." For example, Zhang '752 discloses this limitation based on the following exemplary citations: <i>See 1[c]</i> To the extent it is found that Zhang '752 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Zhang '752 does not anticipate this claim, Zhang '752 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 Zhang '752 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[d]	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.	At least under Pegasus's apparent infringement theory, Zhang '752 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, Zhang '752 discloses this limitation based on the following exemplary citations: <i>See 1[d]</i> To the extent it is found that Zhang '752 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Zhang '752 does not anticipate this claim, Zhang '752 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 Zhang '752 with any

Invalidity of U.S. Patent 10,616,932 in view of Zhang '752		
Claim Language		Exemplary Citations to Zhang '752
		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.

5. Claim 9

Invalidity of U.S. Patent 10,616,932 in view of Zhang '752		
Claim Language		Exemplary Citations to Zhang '752
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	At least under Pegasus's apparent infringement theory, Zhang '752 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, Zhang '752 discloses this limitation based on the following exemplary citations: <i>See 2[pre]</i> To the extent it is found that Zhang '752 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Zhang '752 does not anticipate this claim, Zhang '752 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 Zhang '752 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	At least under Pegasus's apparent infringement theory, Zhang '752 discloses "the central unit comprises a node configured to provide a PDCP function, for

Invalidity of U.S. Patent 10,616,932 in view of Zhang '752		
Claim Language		Exemplary Citations to Zhang '752
	transmission of the user plane data.	transmission of the user plane data.” For example, Zhang '752 discloses this limitation based on the following exemplary citations: <i>See 2[a]</i> To the extent it is found that Zhang '752 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Zhang '752 does not anticipate this claim, Zhang '752 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 Zhang '752 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.

6. Claim 11

Invalidity of U.S. Patent 10,616,932 in view of Zhang '752		
Claim Language		Exemplary Citations to Zhang '752
11[a]	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 identification information.	At least under Pegasus’s apparent infringement theory, Zhang '752 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 identification information.” For example, Zhang '752 discloses this limitation based on the following exemplary citations: <i>See 4[a]</i> To the extent it is found that Zhang '752 does not expressly disclose this limitation, the limitation is inherent. Moreover, to the extent it is found that Zhang '752 does not anticipate this claim, Zhang '752 renders it obvious, either alone, in combination with

Invalidity of U.S. Patent 10,616,932 in view of Zhang '752		
Claim Language		Exemplary Citations to Zhang '752
		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 Zhang '752 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.