EXHIBIT H-22

Invalidity of U.S. Pat. No. 11,700,597 ("the '597 patent") in View of IEEE Std 802.11-2012 ("802.11-2012")

IEEE Std 802.11-2012 ("**802.11-2012**") qualifies as prior art under at least 35 U.S.C. §§ 102 and/or 103 for the asserted claims of U.S. Pat. No. 11,700,597 ("the '597 patent"), as discussed in detail in the claim chart below, and the pleading cover.

The meaning of the terms in the claims has yet to be resolved by the Court. The support identified in the chart below is responsive to Plaintiff's infringement contentions, which Defendants disagree with. As such, nothing in Defendants' claim charts should be construed as an admission regarding infringement, either literally or under the doctrine of equivalents, or as an admission regarding Defendants' understanding of the proper scope of the asserted claims. Defendants reserve the right to rely on additional citations or sources of evidence that also may be applicable, or that may become applicable in light of claim construction, changes in Wilus' infringement contentions, and/or information obtained during discovery as the case progresses.

To the extent Wilus alleges that 802.11-2012 does not disclose any particular limitation of the asserted claims of the '597 patent, either expressly or inherently, it would have been obvious to a person of ordinary skill in the art as of the priority date of the '597 patent to modify 802.11-2012 and/or to combine the teachings of 802.11-2012 with other prior art references, including but not limited to the prior art references cited in the Cover Pleading and the relevant section(s) of claim charts for other prior art references for the '597 patent in a manner that would have rendered the asserted claims invalid as obvious.

Where Defendants cite a particular figure, such citation should be understood to encompass the caption and description of the figure and any text relating to the figure, in addition to the figure itself. Conversely, where a cited portion of text refers to a figure, the citation should be understood to include the figure as well.

Defendants reserve the right to amend or supplement this claim chart at a later date as more fully set forth in the Cover Pleading, based on, for example and without limitation, subsequent discovery, any amendments to the pleadings, or rulings from the Court.

Patent Owner Exhibit-2002