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

WILUS INSTITUTE OF STANDARDS AND TECHNOLOGY INC., Plaintiff, v. HP INC. Defendant.	Civil Case No. 2:25-cv-00069-JRG-RSP [Lead Case] **JURY TRIAL DEMANDED**
WILUS INSTITUTE OF STANDARDS AND TECHNOLOGY INC., Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC. Defendants.	Civil Case No. 2:25-cv-00070-JRG-RSP [Member Case] **JURY TRIAL DEMANDED**

DEFENDANTS' P.R. 4-1 EXCHANGE OF PROPOSED TERMS AND
CLAIM ELEMENTS FOR CONSTRUCTION

Pursuant to Patent Rule 4-1 and the Court's Docket Control Order (Dkt. No. 51), Defendants Samsung Electronics Co., Ltd. ("SEC") and Samsung Electronics America, Inc. ("SEA") (collectively, "Samsung" or "Defendants") identify the following list of claim terms, phrases, or clauses which Defendants contend should be construed or found indefinite by the Court and which claim elements Defendants contend should be governed by 35 U.S.C. § 112(f).

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Defendants' list was compiled based in part on plaintiff Wilus Institute of Standards and Technology Inc's. ("Wilus's") apparent view of the scope of the claims as identified in its P.R. 3-1 infringement contentions. Defendants reserve the right to modify the list below based on any changes to Wilus's contentions should it seek, and be permitted to, amend its contentions.

In addition, Defendants reserve the right to modify the list below in light of Wilus's list of terms for construction or proposed claim constructions. Defendants also reserve the right to include within its list of proposed terms for construction any terms included on Wilus's list of proposed claim terms for construction. Defendants anticipate that the parties may be able to narrow the list of terms and phrases to be construed during the process culminating in the preparation of a joint claim construction and prehearing statement pursuant to Patent Rule 4-3 and the Court's Docket Control Order.

Additionally, the inclusion of any claim terms, phrases, or clauses on this list is not intended to and does not constitute an admission that the term or phrase is capable of construction and not indefinite under 35 U.S.C. § 112, lacking enablement or adequate written description, or otherwise incapable of construction. Defendants reserve the right to contest any such terms and the validity of any claim of the patents-in-suit.

I. U.S. PATENT NO. 10,911,186

Claim Term	Claims	Indefinite	§ 112(f)
"wherein the trigger frame further includes the padding field when the AID field is set to a specific value."	1, 11	X	
"duplicated bit information"	5, 6, 15, 16,		
"duplicating the predetermined AID field information"	7, 17		

"repeating a specific value"	10		
"a time needed for the one or more terminals to process the trigger frame"	2, 12	X	
"the predetermined AID field"	5, 7, 15, 17	X	
"wherein the AID field is used to identify whether the trigger frame includes a padding field to which padding is applied"	1	X	

II. U.S. PATENT NO. 11,716,171

Claim Term	Claims	Indefinite	§ 112(f)
"wherein the first padding field is used to adjust a length of the frame"	1	X	
"wherein the first padding field is used to extend the length of the frame"	6	X	
"wherein the second padding field is used to set a same lengths of the response frames when two or more terminals transmit response frames in response to the trigger frame"	8	X	

III. U.S. PATENT NO. 11,664,926

Claim Term	Claims	Indefinite	§ 112(f)
"wherein a type of the response frame is determined as one of an Ack frame, a compressed BlockAck frame, and a multi-STA BlockAck frame"	1, 8	X	

IV. U.S. PATENT NO. 12,004,262

Claim Term	Claims	Indefinite	§ 112(f)
"wherein the active BSS color is a BSS color actually used by the wireless communication terminal"	1, 4	X	
"when the format of the PPDU including the trigger frame is a PPDU format in which any	1, 4	X	

physical layer signaling field including the field for indicating the BSS color is not included”			

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Respectfully submitted,

/s/ Ralph A. Phillips

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CERTIFICATE OF SERVICE

This is to certify that on October 23, 2025 a true and correct copy of the foregoing instrument was served on counsel of record for Plaintiff via electronic mail.

/s/ Ralph A, Phillips
Ralph A. Phillips