

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

XIFI NETWORKS R&D, INC.,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Defendants.

Case No. 2:24-cv-01057-JRG

AMENDED JOINT CLAIM CONSTRUCTION STATEMENT

I. INTRODUCTION

Pursuant to Patent Rule 4-3, Plaintiff XiFi Networks R&D, Inc. (“XiFi”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively “Samsung”) submit this amended joint claim construction statement in preparation for the April 29, 2026 Claim Construction Hearing in this action regarding U.S. Patent Nos. 11,818,591 (“’591 patent”), 11,849,337 (“’337 patent”), 11,856,414 (“’414 patent”), 11,974,143 (“’143 patent”), 11,950,105 (“’105 patent”), 12,003,976 (“’976 patent”), 12,015,933 (“’933 patent”), 12,114,177 (“’177 patent”), 12,169,756 (“’756 patent”), 12,190,198 (“’198 patent”), and 12,250,564 (“’564 patent”).

This amended joint claim construction statement amends the parties’ February 4, 2026 filing (Dkt. 52) to reflect the parties’ recent agreement that the term “without requiring [the] disassociation of the recipient” should have its plain and ordinary meaning, as set forth below.

II. CONSTRUCTION OF THE CLAIMS AND TERMS TO WHICH THE PARTIES AGREE

The parties agree that the following terms should be construed as follows:

Claim Term	Patent Claim(s) ¹	Agreed Construction
“virtual MAC interface”	’591 patent, claim 1; ’337 patent, claim 1; ’414 patent, claim 1; ’143 patent, claim 1; ’105 patent, claim 1; ’976 patent, claim 1; ’933 patent, claim 1; ’177 patent, claim 1; ’756 patent, claim 1; ’198 patent, claim 1; ’564 patent, claim 1	“a software- or logical-based interface that is separately addressable from the recited actual MAC interfaces and that obscures the recited actual MAC interfaces from higher protocol stack layers”
“in a manner transparent to any layer of the wireless networking device above the	’591 patent, claim 1; ’337 patent, claim 1; ’414 patent, claim 1; ’143 patent, claim 1; ’105 patent, claim 1; ’976 patent, claim 1; ’933 patent, claim 1; ’177 patent, claim 1; ’756	“in a manner where any protocol stack layer of the wireless networking device above the processing interface is unaware of the operation of the processing interface”

¹ Identification here of independent claims includes all asserted claims dependent upon such independent claims.

Claim Term	Patent Claim(s) ¹	Agreed Construction
processing interface”	patent, claim 1; ’198 patent, claim 1; ’564 patent, claim 1	
“recipient”	’591 patent, claim 1; ’337 patent, claim 1; ’414 patent, claim 1; ’143 patent, claim 1; ’105 patent, claim 1; ’976 patent, claim 1; ’933 patent, claim 1; ’177 patent, claim 1; ’756 patent, claim 1; ’198 patent, claim 1; ’564 patent, claim 1	Plain and ordinary meaning
“virtual PHY interface”	’591 patent, claim 1; ’337 patent, claim 1; ’414 patent, claim 1; ’105 patent, claim 1; ’143 patent, claim 1; ’976 patent, claim 1; ’933 patent, claim 1	Plain and ordinary meaning
“resource monitoring interface”	’177 patent claim 1; ’756 patent claim 1; ’198 patent claim 1; ’564 patent claim 1	Plain and ordinary meaning
“do[es] not prevent [other] / [any] wireless networking device[s] [devices] from utilizing a range of frequencies corresponding to the remaining portion of the bandwidth availabilit[y] / [ies]”	’591 patent claim 1; ’337 patent claim 1; ’414 patent claim 1; ’105 patent claim 1; ’143 patent claim 1; ’976 patent claim 1; ’933 patent claim 1; ’177 patent claim 1; ’564 patent claim 1	Plain and ordinary meaning
“data stream”	’591 patent, claim 1; ’337 patent, claim 1; ’414 patent, claim 1; ’143 patent, claim 1; ’105 patent, claim 1; ’976 patent, claim 1; ’933 patent, claim 1; ’177 patent, claim 1; ’756 patent, claim 1; ’198 patent, claim 1; ’564 patent, claim 1	Plain and ordinary meaning

Claim Term	Patent Claim(s)¹	Agreed Construction
“wireless transceiver(s)”	’591 patent, claim 1; ’337 patent, claim 1; ’414 patent, claim 1; ’143 patent, claim 1; ’105 patent, claim 1; ’976 patent, claim 1; ’933 patent, claim 1; ’177 patent, claim 1; ’756 patent, claim 1; ’198 patent, claim 1; ’564 patent, claim 1	“a physical component that wirelessly transmits and receives data”
“without requiring [the] disassociation of the recipient”	’337 patent, claim 1; ’414 patent, claims 3-4; ’143 patent, claims 19-20; ’105 patent, claim 1; ’976 patent, claim 1; ’933 patent, claim 1; ’177 patent, claim 1; ’564 patent, claim 1	Plain and ordinary meaning

III. THE PARTIES PROPOSED CONSTRUCTIONS OF DISPUTED CLAIM TERMS

The parties dispute the following claim terms:

Claim Term	Patent Claim(s)²	XiFi’s Proposed Construction	Samsung’s Proposed Construction
Preambles	’591 patent, claim 1; ’337 patent, claim 1; ’414 patent, claim 1; ’143 patent, claim 1; ’105 patent, claim 1; ’976 patent, claim 1; ’933 patent, claim 1; ’177 patent, claim 1; ’756 patent, claim 1; ’198 patent, claim 1; ’564 patent, claim 1	No construction necessary	Preambles are limiting
“wireless networking device”	’591 patent, claim 1; ’337 patent, claim 1; ’414 patent, claim 1; ’143 patent, claim 1; ’105 patent, claim 1; ’976 patent, claim 1; ’933 patent, claim 1; ’177 patent, claim 1; ’756 patent, claim 1; ’198 patent, claim 1; ’564 patent, claim 1	No construction necessary	“a device that relays or provides network access to another device”

² Identification here of independent claims includes all asserted claims dependent upon such independent claims.

Claim Term	Patent Claim(s)²	XiFi's Proposed Construction	Samsung's Proposed Construction
“different bands of frequencies” / “bands of frequencies being different” / “frequency bands being different from each other”	'591 patent, claim 1; '337 patent, claim 1; '414 patent, claim 1; '143 patent, claim 1; '105 patent, claim 1; '976 patent, claim 1; '933 patent, claim 1; '177 patent, claim 1; '756 patent, claim 1; '198 patent, claim 1; '564 patent, claim 1	No construction necessary	“different ranges of frequencies that are defined or allocated by a regulatory or standards body as a band”
“information regarding the bandwidth availabilities of the first, second, and third wireless transceivers” / “information regarding the bandwidth availabilities of the first and second wireless transceivers”/ “information regarding the first and second bandwidth availabilities”	'591 patent, claim 1; '337 patent, claim 1; '414 patent, claim 1; '143 patent, claim 1; '105 patent, claim 1; '976 patent, claim 1; '933 patent, claim 1; '177 patent, claim 1; '756 patent, claim 1; '198 patent, claim 1; '564 patent, claim 1	“information regarding current bandwidth availabilities of the recited wireless transceivers, that can be obtained directly from at least the recited actual PHY interface(s) and the recited actual MAC interface(s)”	“information regarding current bandwidth availabilities of each of the wireless transceivers”

Exhibit A, attached hereto, identifies the disputed claim terms. Exhibit A contains Plaintiff's proposed constructions for each disputed claim term and intrinsic and other evidence in support, and Defendant's proposed constructions for each disputed claim term and intrinsic and other evidence in support.

IV. CLAIM CONSTRUCTION HEARING

The Parties anticipate that the length of time necessary for the Claim Construction Hearing is 2 hours, with the time being split equally between Plaintiff and Defendant.

The Parties do not intend to call live witnesses, but reserve the right to submit expert testimony via declarations as disclosed in their P.R. 4-2 Disclosures.

Dated: February 27, 2026

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on February 27, 2026 to all counsel of record who are deemed to have consented to electronic service via email.

/s/ *Melissa R. Smith*

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