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

SAMSUNG'S PROPOSED CLAIM CONSTRUCTIONS FOR THE TERMS AND PHRASES IDENTIFIED FOR CONSTRUCTION PER LOCAL PATENT RULE 4-2

Pursuant to P.R. 4-2 of the Local Patent Rules of the Eastern District of Texas and the Docket Control Order (Dkt. No. 24), Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., (collectively, "Samsung") hereby provides in Exhibit A its preliminary constructions of claim terms, phrases, and/or clauses for the following patents: U.S. Patent Nos. 11,818,591 ("the '591 patent"), 11,849,337 ("the '337 patent"), 11,856,414 ("the '414 patent"), 11,974,143 ("the '143 patent"), 11,950,105 ("the '105 patent"), 12,003,976 ("the '976 patent"), 12,015,933 ("the '933 patent"), 12,114,177 ("the '177 patent"), 12,169,756 ("the '756 patent"), 12,190,198 ("the '198 patent"), and 12,250,564 ("the '564 patent") (collectively "the Asserted Patents").

The claim terms, phrases, and/or clauses are identified in no particular order, and the order in which they are identified should not be taken as an indication of relative "importance." Any further occurrence of a listed claim term, phrase, and/or clause is intended to receive the same construction as the listed term, phrase, and/or clause, regardless of whether the later occurrence is

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also listed in Exhibit A. Samsung does not contend here that any element of the Asserted Patents is governed by 35 U.S.C. § 112(f).

Samsung is also providing a preliminary identification of extrinsic evidence that Samsung contends supports its proposed claim constructions. Extrinsic evidence in the form of dictionary definitions, learned treatises, and prior art is identified for each claim term by production number in Exhibit A.

Additionally, Samsung hereby discloses that it intends to rely upon the expert testimony of Mark P. Mahon, Ph.D. in support of its proposed constructions. Based on any constructions offered by XiFi, Samsung may also rely upon the testimony of Dr. Mahon in response. Samsung expects that Dr. Mahon may provide opinions including: (i) the meaning of each disputed claim term to a person of ordinary skill in the art, (ii) why Samsung's proposed constructions are consistent with the understanding of a person of ordinary skill in the art; (iii) why XiFi's proposed constructions are not consistent with the understanding of a person of ordinary skill in the art; (iv) the level of ordinary skill in the art; (v) a technical explanation of the extrinsic and intrinsic evidence cited by the parties' including its relation to the relevant claim construction disputes; and/or (vi) a background of the relevant technology relating to each disputed claim term and the state of the art relating to the claim term at the time of the purported invention.

Samsung reserves the right to modify, supplement, or amend the list of claim terms, phrases, and/or clauses set forth in Exhibit A. Samsung also reserves the right to supplement this disclosure and rely upon additional extrinsic evidence, including dictionary definitions, citations to learned treatises and prior art, and testimony of additional percipient and expert witnesses, to the extent necessary to rebut the proposed constructions of XiFi. Samsung also reserves the right to put forth expert testimony in response to any expert testimony XiFi may offer in support of its

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proposed constructions. Samsung also reserves the right to rely on extrinsic and intrinsic evidence cited by XiFi in its claim construction disclosure.

Pursuant to P.R. 4-2(c), Samsung is prepared to meet and confer with XiFi at a mutually agreeable time for the purposes of narrowing the issues and finalizing preparation of a Joint Claim Construction and Prehearing Statement.

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Dated: January 14, 2026

Respectfully submitted,

/s/ Jason C. Williams

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CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on January 14, 2026, all counsel of record who have appeared in this case are being served with a copy of the foregoing via electronic mail.

Dated: January 14, 2026 *<u>/s/ Jason C. Williams</u>*
Jason C. Williams

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Exhibit A

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Patent	Term	Proposed Construction	Extrinsic Evidence
All patents	Preamble	Preamble is limiting	Samsung intends to rely on expert testimony of Dr. Mahon. Dr. Mahon, an expert in the field of the asserted patents, may provide testimony as described in Samsung's PR 4-2 disclosure. Papers and Evidence submitted with *inter partes* review proceedings for the asserted patents (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff.
All patents	"wireless networking device"	"a device that relays or provides network access to another device"	Samsung intends to rely on expert testimony of Dr. Mahon. Dr. Mahon, an expert in the field of the asserted patents, may provide testimony as described in Samsung's PR 4-2 disclosure. Papers and Evidence submitted with *inter partes* review proceedings for the asserted patents (to the extent not qualified as intrinsic evidence). Technical dictionaries and literature including: IEEE 802.3-2012

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Patent	Term	Proposed Construction	Extrinsic Evidence
			(SamsungXiFi_00029140); IEEE 802.11-2012 (SamsungXiFi_00033601), IEEE 802.11ad-2012 (SamsungXiFi_00032973); IEEE 802.11ac-2013 (SamsungXiFi_00028681); *Architecture Taxonomy for Control and Provisioning of Wireless Access Points* (SamsungXiFi_00032916); otoData, *Network Devices* (SamsungXiFi_00036837); ScienceLogic, *A guide to Network Devices* (SamsungXiFi_00037109); US Patent No. 7,848,223 (SamsungXiFi_00037623); US Patent No. 7,948,945 (SamsungXiFi_00037672); US Patent No. 7,995,543 (SamsungXiFi_00037696); US Patent No. 8,649,321 (SamsungXiFi_00037725); US Patent No. 8,842,591 (SamsungXiFi_00037780); US 2002/0061729A1 (SamsungXiFi_00037128); US 2010/0031029A1 (SamsungXiFi_00037165); US 2010/0254345A1 (SamsungXiFi_00037192); US

Patent	Term	Proposed Construction	Extrinsic Evidence
			2011/0162060A1 (SamsungXiFi_00037219); US 2012/0009956A1 (SamsungXiFi_00037260); US 2013/0059585A1 (SamsungXiFi_00037565); Dictionary of Computing (SamsungXiFi_00037597); Microsoft Computer Dictionary (SamsungXiFi_00037648); Newton's Telecom Dictionary (SamsungXiFi_00037651 at -53); Newton's Telecom Dictionary (SamsungXiFi_00037686); Telecom Dictionary (SamsungXiFi_00037721); Webster's Telecom Dictionary (SamsungXiFi_00037800); Wiley Dictionary (SamsungXiFi_00037803); Newton's Telecom Dictionary (SamsungXiFi_00037651 at -57, -58-60, -61); Solo and Small Firm Legal Technology Guide (SamsungXiFi_00037938); Wiley Dictionary (SamsungXiFi_00037764 at -66, -79); Telecom Dictionary (SamsungXiFi_00037806 at -19); Webster's New World Telecom Dictionary (SamsungXiFi_00037827 at -29-

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Patent	Term	Proposed Construction	Extrinsic Evidence
			30); Dictionary of Computing (SamsungXiFi_00037843 at -45, -56); Modern Dictionary of Electronics (SamsungXiFi_00037880 at -85); Microsoft Computer Dictionary (SamsungXiFi_00037886 at -88, -901); The Illustrated Dictionary of Electronics (SamsungXiFi_00037913 at -17); Computer Desktop Encyclopedia (SamsungXiFi_00037922 at -27). Any extrinsic evidence relied upon by Plaintiff.
All patents	"virtual MAC interface"	"a separately addressable interface that obscures actual MAC interface addresses from higher layers"	Samsung intends to rely on expert testimony of Dr. Mahon. Dr. Mahon, an expert in the field of the asserted patents, may provide testimony as described in Samsung's PR 4-2 disclosure. Papers and Evidence submitted with *inter partes* review proceedings for the asserted patents (to the extent not qualified as intrinsic evidence). Technical dictionaries and literature including: IEEE 802.11-2012 (SamsungXiFi_00033601); US Patent No 7,730,210

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Patent	Term	Proposed Construction	Extrinsic Evidence
			(SamsungXiFi_00032960); US Patent 8,094,666 (SamsungXiFi_00036394); US 20060165103A1 (SamsungXiFi_00032891); Newton's Telecom Dictionary (SamsungXiFi_00037651 at -64-67); Wiley Dictionary (SamsungXiFi_00037764 at -70, -71, -76-78); Telecom Dictionary (SamsungXiFi_00037806 at -12, -13, -17-18); Webster's New World Telecom Dictionary (SamsungXiFi_00037827 at -33, -34, -37); Dictionary of Computing (SamsungXiFi_00037843 at -49, -50, -54-55); Microsoft Computer Dictionary (SamsungXiFi_00037886 at -98, -900). Any extrinsic evidence relied upon by Plaintiff.
All patents	"in a manner transparent to any layer of the wireless networking device above the processing interface"	"in a manner where any layer of the wireless networking device above the processing interface is unaware of and is implemented without regard to the operation of processing interface"	Samsung intends to rely on expert testimony of Dr. Mahon. Dr. Mahon, an expert in the field of the asserted patents, may provide testimony as described in Samsung's PR 4-2 disclosure. Papers and Evidence submitted with *inter partes* review

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Patent	Term	Proposed Construction	Extrinsic Evidence
			proceedings for the asserted patents (to the extent not qualified as intrinsic evidence). Technical dictionaries and literature including: IEEE 802.11-2012 (SamsungXiFi_00033601), IEEE 802.11ad-2012 (SamsungXiFi_00032973); IEEE 802.11ac-2013 (SamsungXiFi_00028681); *A Network Transparent, High Reliability Distributed System* (SamsungXiFi_00028558); *A Network Architecture Providing Host Migration Transparency* (SamsungXiFi_00029128); *Multi-Layer Tracing Of TCP Over A Reliable Wireless Link* (SamsungXiFi_00032905); *Interactive Multimedia On Next Generation Networks* (SamsungXiFi_00036403); *Network Layer Mobility: An Archictecture And Survey* (SamsungXiFi_00037117); *All Your Packets Are Belong To Us* (SamsungXiFi_00037138); *Cross-Oayer Design In Wireless Mesh Networks* (SamsungXiFi_00037176); *Transparent Network Services Via*

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Patent	Term	Proposed Construction	Extrinsic Evidence
			A Virtual Traffic Layer For Virtual Machines (SamsungXiFi_00037209); *A Survey Of Cross-Layer In Wireless Network* (SamsungXiFi_00037243); *Network Complexity: Cross-Layer Models And Characteristics* (SamsungXiFi_00037559); *Optimizing Multi-Layered Networks Towards A ATransparently Optical Internet* (SamsungXiFi_00037601); *Internet Transparency* (SamsungXiFi_00037605); *Supporting Transparency In 4G Networks* (SamsungXiFi_00037643); *Transparent Bridging* (SamsungXiFi_00037668); *VRPN: A Device-Independent, Network-Transparent VR Peripheral System* (SamsungXiFi_00037689); Newton's Telecom Dictionary (SamsungXiFi_00037651 at -63); Wiley Dictionary (SamsungXiFi_00037764 at -74-75); Telecom Dictionary (SamsungXiFi_00037806 at -16); IBM Dictionary of Computing (SamsungXiFi_00037820 at -25);

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Patent	Term	Proposed Construction	Extrinsic Evidence
			Webster's New World Telecom Dictionary (SamsungXiFi_00037827 at -36); Dictionary of Communications Technology (SamsungXiFi_00037838 at -42); Dictionary of Computing (SamsungXiFi_00037843 at -53); Tech Terms (SamsungXiFi_00037857 at -61); Modern Dictionary of Electronics (SamsungXiFi_00037880 at -84); Microsoft Computer Dictionary (SamsungXiFi_00037886 at -97); Microsoft Computer Dictionary (SamsungXiFi_00037886 at -94, -95); McGraw Hill Dictionary of Scientific and Technical Terms (SamsungXiFi_00037902 at -06); The Authoritative Dictionary of IEEE Standards Terms (SamsungXiFi_00037907 at -11-12); The Illustrated Dictionary of Electronics (SamsungXiFi_00037913 at -15); Chambers Dictionary of Science and Technology (SamsungXiFi_00037918 at -21); Computer Desktop Encyclopedia (SamsungXiFi_00037922 at -26); ASTM Dictionary of Engineering Science & Technology

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Patent	Term	Proposed Construction	Extrinsic Evidence
			(SamsungXiFi_00037928 at -32); Hargrave's Communications Dictionary (SamsungXiFi_00037933 at -37). Any extrinsic evidence relied upon by Plaintiff.
All patents	"recipient"	"an individually addressable device comprising at least one transceiver"	Samsung intends to rely on expert testimony of Dr. Mahon. Dr. Mahon, an expert in the field of the asserted patents, may provide testimony as described in Samsung's PR 4-2 disclosure. Papers and Evidence submitted with *inter partes* review proceedings for the asserted patents (to the extent not qualified as intrinsic evidence). Technical dictionaries and literature including: Computer Networks Dictionary (SamsungXiFi_00028567); ASTM Dictionary of Engineering Science & Technology (SamsungXiFi_00032888); IBM Dictionary of Computing (SamsungXiFi_00032957); IBM Dictionary of Computing (SamsungXiFi_00037820 at -23).

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Patent	Term	Proposed Construction	Extrinsic Evidence
			Any extrinsic evidence relied upon by Plaintiff.
’591, ’337, ’414, ’105, ’143, ’976, ’933	“virtual PHY interface”	Plain and ordinary meaning	Samsung does not believe this term needs any further construction. To the extent that XiFi argues that this term requires construction or otherwise requires interpretation from the Court, Samsung reserves the right to identify and use extrinsic evidence in the form of dictionaries, relevant technical literature, and/or expert testimony to refute any such contention from XiFi. Such extrinsic evidence may include, but is not limited to, the testimony of Dr. Mark Mahon. Any extrinsic evidence relied upon by Plaintiff.
’177, ’756, ’198, ’564	“resource monitoring interface”	Plain and ordinary meaning	Samsung does not believe this term needs any further construction. To the extent that XiFi argues that this term requires construction or otherwise requires interpretation from the Court, Samsung reserves the right to identify and use extrinsic evidence in the form of dictionaries, relevant technical literature, and/or expert testimony to refute

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Patent	Term	Proposed Construction	Extrinsic Evidence
			any such contention from XiFi. Such extrinsic evidence may include, but is not limited to, the testimony of Dr. Mark Mahon. Any extrinsic evidence relied upon by Plaintiff.
All patents	"information regarding the [first and second] bandwidth availabilities"	"amount of bandwidth that is currently available"	Samsung intends to rely on expert testimony of Dr. Mahon. Dr. Mahon, an expert in the field of the asserted patents, may provide testimony as described in Samsung's PR 4-2 disclosure. Papers and Evidence submitted with *inter partes* review proceedings for the asserted patents (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff.
'591, '337, '414, '105, '143, '976, '933, '177, '564	"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]"	Plain and ordinary meaning	Samsung does not believe this term needs any further construction. To the extent that XiFi argues that this term requires construction or otherwise requires interpretation from the Court, Samsung reserves the right to identify and use extrinsic evidence in the form of dictionaries,

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Patent	Term	Proposed Construction	Extrinsic Evidence
			relevant technical literature, and/or expert testimony to refute any such contention from XiFi. Such extrinsic evidence may include, but is not limited to, the testimony of Dr. Mark Mahon. Any extrinsic evidence relied upon by Plaintiff.
'337, '105, '976, '933, '177, '564, '414 (claims 3-4) '143 (claims 19-20)	"without requiring [the] disassociation of the recipient"	"while actively maintaining association of the recipient"	Samsung intends to rely on expert testimony of Dr. Mahon. Dr. Mahon, an expert in the field of the asserted patents, may provide testimony as described in Samsung's PR 4-2 disclosure. Papers and Evidence submitted with *inter partes* review proceedings for the asserted patents (to the extent not qualified as intrinsic evidence). Any extrinsic evidence relied upon by Plaintiff.
All patents	"data stream"	"a sequence of two or more application-layer data transmissions"	Samsung intends to rely on expert testimony of Dr. Mahon. Dr. Mahon, an expert in the field of the asserted patents, may provide testimony as described in Samsung's PR 4-2 disclosure.

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Patent	Term	Proposed Construction	Extrinsic Evidence
			Papers and Evidence submitted with *inter partes* review proceedings for the asserted patents (to the extent not qualified as intrinsic evidence). Technical dictionaries and literature including: Newton's Telecom Dictionary (SamsungXiFi_00037651 at-55); Wiley Dictionary (SamsungXiFi_00037764 at -68); Telecom Dictionary (SamsungXiFi_00037806 at -10); IBM Dictionary of Computing (SamsungXiFi_00037820 at -22); Dictionary of Communications Technology (SamsungXiFi_00037838 at -40); Dictionary of Computing (SamsungXiFi_00037843 at -47); Tech Terms (SamsungXiFi_00037857 at -59); Modern Dictionary of Electronics (SamsungXiFi_00037880 at -82); Microsoft Computer Dictionary (SamsungXiFi_00037886 at -90); McGraw Hill Dictionary of Scientific and Technical Terms (SamsungXiFi_00037902 at -04); The Authoritative Dictionary of IEEE Standards Terms

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Patent	Term	Proposed Construction	Extrinsic Evidence
			(SamsungXiFi_00037907 at -09); Computer Desktop Encyclopedia (SamsungXiFi_00037922 at -24); ASTM Dictionary of Engineering Science & Technology (SamsungXiFi_00037928 at -30); Hargrave's Communications Dictionary (SamsungXiFi_00037933 at -35). Any extrinsic evidence relied upon by Plaintiff.
All patents	"transceiver"	"a device that wirelessly transmits and receives data by converting digital signals to radio waves"	Samsung intends to rely on expert testimony of Dr. Mahon. Dr. Mahon, an expert in the field of the asserted patents, may provide testimony as described in Samsung's PR 4-2 disclosure. Papers and Evidence submitted with *inter partes* review proceedings for the asserted patents (to the extent not qualified as intrinsic evidence). Technical dictionaries and literature including: US Patent No. 7,751,496 (SamsungXiFi_00028542); US Patent No. 8,260,145 (SamsungXiFi_00029106); Newton's Telecom Dictionary

Patent	Term	Proposed Construction	Extrinsic Evidence
			(SamsungXiFi_00037651 at -62); Wiley Dictionary (SamsungXiFi_00037764 at -73); Telecom Dictionary (SamsungXiFi_00037806 at -15); IBM Dictionary of Computing (SamsungXiFi_00037820 at -24); Webster's New World Telecom Dictionary (SamsungXiFi_00037827 at -35); Dictionary of Communications Technology (SamsungXiFi_00037838 at -41); Dictionary of Computing (SamsungXiFi_00037843 at -52); Tech Terms (SamsungXiFi_00037857 at -60-61); Modern Dictionary of Electronics (SamsungXiFi_00037880 at -83); Microsoft Computer Dictionary (SamsungXiFi_00037886 at -96); McGraw Hill Dictionary of Scientific and Technical Terms (SamsungXiFi_00037902 at -05); The Authoritative Dictionary of IEEE Standards Terms (SamsungXiFi_00037907 at -10); The Illustrated Dictionary of Electronics (SamsungXiFi_00037913 at -15); Chambers Dictionary of Science

Patent	Term	Proposed Construction	Extrinsic Evidence
			and Technology (SamsungXiFi_00037918 at -20); Computer Desktop Encyclopedia (SamsungXiFi_00037922 at -24); Computer Desktop Encyclopedia (SamsungXiFi_00037922 at -25); Hargrave's Communications Dictionary (SamsungXiFi_00037933 at -36). Any extrinsic evidence relied upon by Plaintiff.
All patents	"different bands of frequencies" / "bands of frequencies being different" / "frequency bands being different from each other"	"different ranges of frequencies that are defined or allocated by a regulatory or standards body as a band (e.g., 2.4GHz band, 5GHz band, or 6 GHz band)"	Samsung intends to rely on expert testimony of Dr. Mahon. Dr. Mahon, an expert in the field of the asserted patents, may provide testimony as described in Samsung's PR 4-2 disclosure. Papers and Evidence submitted with *inter partes* review proceedings for the asserted patents (to the extent not qualified as intrinsic evidence). Technical dictionaries and literature including: IEEE 802.11-2012 (SamsungXiFi_00033601), IEEE 802.11ad-2012 (SamsungXiFi_00032973); IEEE 802.11ac-2013 (SamsungXiFi_00028681); 47

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Patent	Term	Proposed Construction	Extrinsic Evidence
			CFR Ch. 1 (SamsungXiFi_00036840; 47 CFR Part 2 (SamsungXiFi_00037282); FCC -2-328 (SamsungXiFi_00037862); 47 CFR (SamsungXiFi_00037943); Newton's Telecom Dictionary (SamsungXiFi_00037651 at -54, -56); Wiley Dictionary (SamsungXiFi_00037764 at -67, -69); Webster's New World Telecom Dictionary (SamsungXiFi_00037827 at -31, -32); Dictionary of Computing (SamsungXiFi_00037843 at -46, -48); Microsoft Computer Dictionary (SamsungXiFi_00037886 at -89, -91, -92). Any extrinsic evidence relied upon by Plaintiff.

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