

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

EVOLVED WIRELESS, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 1:15-cv-00542-SLR
	)	
APPLE INC.,	)	
	)	
Defendant.	)	
EVOLVED WIRELESS, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 1:15-cv-00543-SLR
	)	
HTC CORPORATION and HTC AMERICA, INC.,	)	
	)	
Defendants.	)	
EVOLVED WIRELESS, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 1:15-cv-00544-SLR
	)	
LENOVO GROUP LTD., LENOVO (UNITED STATES) INC., and MOTOROLA MOBILITY,	)	
	)	
Defendants.	)	
EVOLVED WIRELESS, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 1:15-cv-00545-SLR
	)	
SAMSUNG ELECTRONICS CO., LTD. and SAMSUNG ELECTRONICS AMERICA, INC.,	)	
	)	
Defendants.	)	
	)	

EVOLVED WIRELESS, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 1:15-cv-00546-SLR
	)	
ZTE CORPORATION, ZTE (USA) INC.,	)	
and ZTE SOLUTIONS INC.,	)	
	)	
Defendants.	)	
	)	

## EVOLVED WIRELESS'S IDENTIFICATION OF CLAIM TERMS AND PROPOSED CONSTRUCTIONS

Pursuant to the Court’s Scheduling Order and as amended by agreement of the parties, Evolved Wireless identifies the following terms in the patents-in-suit in need of construction and the proposed constructions.

	<b>'916 Patent Claim terms</b>	<b>Proposed construction</b>
	All terms in the '916 Patent should be given their plain and ordinary meaning.	

	<b>'965 Patent Claim terms</b>	<b>Proposed construction</b>
	All terms in the '965 Patent should be given their plain and ordinary meaning.	

	<b>'373 Patent Claim terms</b>	<b>Proposed construction</b>
<b>1.</b>	“handover”	a process to transfer a telecommunication link by establishing radio connection with the target base station after radio connection with the source base station has ceased
<b>2.</b>	“target base station”	the base station to which the source base station determines the mobile terminal will be transferred
<b>3.</b>	Claim 17: “the measurement report is used to determine”	the measurement report is used by the source base station to determine

	<b>'236 Patent Claim terms</b>	<b>Proposed construction</b>
	All terms in the '236 Patent should be given their plain and ordinary meaning.	

	<b>'481 Patent Claim terms</b>	<b>Proposed construction</b>
	All terms in the '481 Patent should be given their plain and ordinary meaning.	

Discovery is at an early stage and expert discovery has not been completed. Evolved Wireless reserves the right to propose additional terms and amend its proposed constructions as the case moves forward and disputes or disagreements emerge between the parties, including from the claim terms and proposed constructions identified by the defendants in connection with the joint claim construction statement to be filed with the Court on May 17, 2016.

Dated: April 26, 2016

Respectfully submitted,

/s/ Ryan M. Schultz

---

FARNAN LLP  
Brian E. Farnan (Bar No. 4089)  
Michael J. Farnan (Bar No. 5165)  
919 N. Market Street, 12th Floor  
Wilmington, Delaware 19801  
(302) 777-0300  
(302) 777-0301  
bfarnan@farnanlaw.com

Christopher K. Larus (admitted *pro hac vice*)  
Ryan M. Schultz (admitted *pro hac vice*)  
Andrew D. Hedden (admitted *pro hac vice*)  
Benjamin C. Linden (admitted *pro hac vice*)  
Ryan E. Dornberger (admitted *pro hac vice*)  
Anthony F. Schlehuber (admitted *pro hac vice*)

ROBINS KAPLAN LLP  
800 LaSalle Avenue, Suite 2800  
Minneapolis, Minnesota 55402  
Telephone: (612) 349-8500  
Facsimile: (612) 339-4181  
clarus@robinskaplan.com  
rschultz@robinskaplan.com  
ahedden@robinskaplan.com  
blinden@robinskaplan.com  
rdornberger@robinskaplan.com  
aschlehuber@robinskaplan.com

Andrea L. Gothing (admitted *pro hac vice*)  
ROBINS KAPLAN LLP  
2440 W. El Camino Real, Suite 100  
Mountain View, CA 94040  
Telephone: (650) 784-4040  
Facsimile: (650) 784-4041  
agothing@robinskaplan.com

**Counsel For Plaintiff Evolved Wireless, LLC**