

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

FOUR BATONS WIRELESS, LLC

Plaintiff,

v.

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

Defendants.

Case No. 2:24-cv-00284-JRG

**THE PARTIES’ P.R. 4-3 JOINT CLAIM CONSTRUCTION AND
PRE-HEARING STATEMENT**

Under this Court’s Scheduling Order and Local Rule 4-3, Plaintiff Four Batons Wireless, LLC (“Four Batons”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Defendants”) file this joint claim construction and prehearing statement.

The claim construction hearing, which is set for August 11, 2025, is set to address, to the extent necessary, asserted U.S. Patent Nos. 8,798,006 (the “’006 Patent”), 8,239,671 (the “’671 Patent”), 7,502,348 (the “’348 Patent”), and 8,073,436 (the “’436 Patent”) (collectively, the “Asserted Patents”).

I. P.R. 4-3(a)(1): Agreed Claim Constructions

Claim Language	Agreed Construction
“location of samples” (’006 Patent, claim 7)	Plain and ordinary meaning

Claim Language	Agreed Construction
“channel binding key” (’671 Patent, claims 1, 6, 10, 11, 18, 19)	“a key that is derived from a Channel Binding Master Key and cryptographically bound to a Key Binding Blob using a Key Derivation Function”
“channel binding master key” (’671 Patent, claims 1, 6, 8, 11, 18)	“a key from which a Channel Binding Key is derived using a Key Derivation Function”
“key binding blob” (’671 Patent, claims 1, 6, 8, 11, 18)	“an octet-string that is constructed from static parameters advertised from an authenticator using an Authenticator-Supplicant Protocol”
“authenticator” (’671 Patent, claims 1, 3, 4, 7, 10, 11, 19)	“a network-side entity that uses a Channel Binding Key for an Authenticator-Supplicant Protocol”
“supplicant” / “mobile supplicant” (’671 Patent, claims 1, 3, 8, 10)	“a user-side entity that uses a Channel Binding Key for an Authenticator-Supplicant Protocol”
“authenticator-supplicant protocol” (’671 Patent, claims 7, 8, 10)	“a protocol that is executed between a supplicant and an authenticator and uses a Channel Binding Key for protecting the protocol”
“[deriving a / derive said] channel binding key from a channel binding master key bound to a key binding blob using a key derivation function” (’671 Patent, claims 1, 6)	“[deriving a / derive said] channel binding key from a channel binding master key and binding the channel binding key to a key binding blob using a key derivation function”
“said parameters” (’671 Patent, claims 3, 4)	“said access network parameters”
“said supplicant using the channel binding master key for protecting an authenticator-supplicant protocol” (’671 Patent, claim 8)	Plain and ordinary meaning
“certain process” / “certain processes” (’436 Patent, claims 10, 15, 17)	Plain and ordinary meaning
“configured to” (’436 Patent, claim 19)	Plain and ordinary meaning, which means being in a state to perform the function without modification

II. P.R. 4-3(a)(2): Proposed Construction for Terms in Dispute

The enclosed Exhibits A and B show the parties' proposed constructions with intrinsic and extrinsic evidence supporting such constructions. Plaintiff's proposed constructions with evidence are listed in Exhibit A, and Defendants' proposed constructions with evidence are listed in Exhibit B. All parties reserve the right to rely upon any intrinsic or extrinsic evidence identified by any other party, and any evidence obtained through claim construction discovery. In addition, each party reserves the right to amend, correct, or supplement its claim construction positions and supporting evidence in response to any change of position by any other party, or for other good cause.

III. P.R. 4-3(a)(3): Anticipated Length of Time for Claim Construction Hearing

The parties anticipate that the *Markman* hearing will take a half-day.

IV. P.R. 4-3(a)(4): Anticipated Witnesses at the Claim Construction Hearing

No party will call any live witnesses at the claim construction hearing. As identified in Exhibits A and B, the parties may submit expert declarations from various experts in support of certain claim construction proposals.

V. P.R. 4-3(a)(5): Other Issues to be Addressed at Claim Construction Prehearing Conference

The parties note that, as of this submission, Samsung's Motion to Disqualify Plaintiff's Technical Expert, Dr. Matthew B. Shoemake (Dkt. 45), remains pending before the Court.

Dated: May 30, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2025, I served the above and foregoing instrument on all counsel of record via the Court's electronic filing system.

Allen J. Hernandez

Exhibit A to P.R. 4-3 Joint Claim Construction and Pre-Hearing Statement

Disputed Claim Language	Plaintiffs’ Proposed Construction and Support¹
<p>“two sample tests” (’006 Patent, claims 1, 3)</p>	<p>Plain and ordinary meaning</p> <p>Alternatively, plain and ordinary meaning, which means “a statistical hypothesis test that compares two samples to determine whether they differ in a specified property (e.g., mean, median, or distribution)”</p> <p><u>Intrinsic evidence</u> ’006 Patent at 10:1-3, 16:60-64, 17:10-34, 17:57-59, 18:25-35, 18:66-19:2, 19:31-40, 20:43-54</p> <p><u>Extrinsic evidence</u> Expert opinion of Dr. Martin J. Feuerstein</p>
<p>“two-sample method” (’006 Patent, claim 2)</p>	<p>Plain and ordinary meaning</p> <p>Alternatively, plain and ordinary meaning, which means “a statistical hypothesis test that compares two samples to determine whether they differ in a specified property (e.g., mean, median, or distribution)”</p> <p><u>Intrinsic evidence</u> ’006 Patent at 10:1-3, 16:60-64, 17:10-34, 17:57-59, 18:25-35, 18:66-19:2, 19:31-40, 20:43-54</p> <p><u>Extrinsic evidence</u> Expert opinion of Dr. Martin J. Feuerstein</p>
<p>“the mobile device having limited knowledge of the quality of the current path” (’006 Patent, claim 4)</p>	<p>Plain and ordinary meaning</p> <p><u>Intrinsic evidence</u> ’006 Patent at 5:1-12, 7:24-28, 10:1-3, 16:60-17:5</p> <p><u>Extrinsic evidence</u> Expert opinion of Dr. Martin J. Feuerstein</p>

¹ To the extent not cited herein, Plaintiff reserves the right to rely on any evidence cited or discussed in their disclosure of expert testimony from Martin J. Feuerstein pursuant to P.R. 4-3(b).

Disputed Claim Language	Plaintiffs’ Proposed Construction and Support ¹
<p>“having insufficiently many measurements for an estimate of the mean quality of the current path and its variance” (’006 Patent, claim 5)</p>	<p>Plain and ordinary meaning</p> <p><u>Intrinsic evidence</u> ’006 Patent at 1:61-67, 2:14-19, 7:24-28, 10:1-3, 16:60-17:5</p> <p><u>Extrinsic evidence</u> Expert opinion of Dr. Martin J. Feuerstein IPR2025-00496, Petition for Inter Partes Review of U.S. Patent No. 8,798,006, at 42 (4B-SAM_00002206–2278) IPR2025-00496 Ex. 1002, Declaration of Sumit Roy, Ph.D. in Support of Petition for Inter Partes Review of U.S. Patent No. 8,798,006, ¶ 181 (4B-SAM_00002703–2798)</p>
<p>“observations are not matched” (’006 Patent, claim 5)</p>	<p>Plain and ordinary meaning</p> <p><u>Intrinsic evidence</u> ’006 Patent at 15:8-16:56, 19:16-20, 19:48-64, Table 2, Figure 7</p> <p><u>Extrinsic evidence</u> Expert opinion of Dr. Martin J. Feuerstein IPR2025-00496, Petition for Inter Partes Review of U.S. Patent No. 8,798,006, at 40 (4B-SAM_00002206–2278) IPR2025-00496 Ex. 1002, Declaration of Sumit Roy, Ph.D. in Support of Petition for Inter Partes Review of U.S. Patent No. 8,798,006, ¶ 175 (4B-SAM_00002703–2798)</p>
<p>“server” (’671 Patent, claim 10)</p>	<p>Plain and ordinary meaning</p> <p><u>Intrinsic evidence</u> ’671 Patent at 1:52-54, 12:56-57, 13:5, 13:17-53</p> <p><u>Extrinsic evidence</u> IEEE Standard Dictionary of Electrical and Electronics Terms, Sixth Edition, IEEE Std. 100-1996, 10 December 1996, ISBN 1-55937-833-6, pp. 972–73 (4B-SAM_00002040–2044) Expert opinion of Dr. Martin J. Feuerstein</p>

Disputed Claim Language	Plaintiffs' Proposed Construction and Support ¹
<p>“EAP methods” (’671 Patent, claim 2)</p>	<p>Plain and ordinary meaning</p> <p><u>Intrinsic evidence</u> ’671 Patent at 4:14-20, 5:37-39</p> <p><u>Extrinsic evidence</u> Expert opinion of Dr. Martin J. Feuerstein RFC 3748 at 1, 3 (Mar. 2004) (4B-SAM_00002799–2823)</p>
<p>“while ... the current network satisfies the mobile device’s requirements” (’348 Patent, claim 1)</p>	<p>Plain and ordinary meaning</p> <p><u>Intrinsic evidence</u> ’348 Patent at 5:9-14, 6:16-18, 6:55-65, 9:48-54, 10:29-41, 10:43-56, 11:66-12:3, 12:34-39, 14:44-54, 15:3-13, 15:14-21, 15:30-44, 16:21-30, 17:28-18:3, Figure 1, Figure 4, Figure 5</p> <p><u>Extrinsic evidence</u> Expert opinion of Dr. Martin J. Feuerstein IPR2025-00493 Petition for Inter Partes Review of U.S. Patent No. 7,502,348, at 11 (4B-SAM_00002046–2119) IPR2025-00493 Ex. 1002, Declaration of Michael Kotzin, Ph.D. in Support of Petition for Inter Partes Review of U.S. Patent 7,502,348, ¶ 93 (4B-SAM_00002279–2485)</p>
<p>“silent period of an application” (’348 Patent, claim 1)</p>	<p>Plain and ordinary meaning</p> <p><u>Intrinsic evidence</u> ’348 Patent at 7:59-66, 8:5-13, 9:7-10, 9:48-54, 9:65-10:15, 16:20-30</p> <p><u>Extrinsic evidence</u> Reducing Energy Consumption on Mobile Devices with WiFi Interfaces, Tao Zhang, Sunil Madhani, Provin Gurung, Eric van den Berg, Telcordia Technologies, IEEE Communications Society, GLOBECOM ’05 IEEE Global Telecommunications Conference proceedings, 2005, 28 November 2005 - 02 December 2005, St. Louis, MO, https://ieeexplore.ieee.org/document/1577687 (4B-SAM_00002045–2049) Expert opinion of Dr. Martin J. Feuerstein</p>

Disputed Claim Language	Plaintiffs' Proposed Construction and Support ¹
<p>“actionable silent period” (’348 Patent, claims 14, 15)</p>	<p>Plain and ordinary meaning</p> <p><u>Intrinsic evidence</u> ’348 Patent at 6:14-20, 9:7-18, 9:48-54, 9:65-10:15, 16:21-30, 17:4-27</p> <p><u>Extrinsic evidence</u> Reducing Energy Consumption on Mobile Devices with WiFi Interfaces, Tao Zhang, Sunil Madhani, Provin Gurung, Eric van den Berg, Telcordia Technologies, IEEE Communications Society, GLOBECOM ’05 IEEE Global Telecommunications Conference proceedings, 2005, 28 November 2005 - 02 December 2005, St. Louis, MO, https://ieeexplore.ieee.org/document/1577687 (4B-SAM_00002045–2049) Expert opinion of Dr. Martin J. Feuerstein</p>
<p>“after having the mobile device start said at least one handoff action” (’348 Patent, claims 16, 17)</p>	<p>Plain and ordinary meaning</p> <p><u>Intrinsic evidence</u> ’348 Patent at 16:21-30, 17:19-18:3</p> <p><u>Extrinsic evidence</u> Expert opinion of Dr. Martin J. Feuerstein IPR2025-00493 Petition for Inter Partes Review of U.S. Patent No. 7,502,348, at 53-54 (4B-SAM_00002046–2119) IPR2025-00493 Ex. 1002, Declaration of Michael Kotzin, Ph.D. in Support of Petition for Inter Partes Review of U.S. Patent 7,502,348 ¶¶ 233, 236 (4B-SAM_00002279–2485)</p>

Disputed Claim Language	Plaintiffs' Proposed Construction and Support¹
<p>“brief interval” (’436 Patent, claims 1, 17, 19)</p>	<p>Plain and ordinary meaning</p> <p><u>Intrinsic evidence</u> ’436 Patent at 3:29-35, 7:24-31, 9:55-58, 12:35-67, 13:5-9, 17:22-18:54</p> <p><u>Extrinsic evidence</u> Expert opinion of Dr. Martin J. Feuerstein IPR2025-00494 Petition for Inter Partes Review of U.S. Patent No. 8,073,436, at 22-24 (4B-SAM_00002120–2205) IPR2025-00494 Ex. 1002, Declaration of Dr. Michael Kotzin in Support of Petition for Inter Partes Review of U.S. Patent No. 8,073,436, ¶¶ 219, 220 (4B-SAM_00002486–2702)</p>
<p>“a desired level” (’436 Patent, claim 11)</p>	<p>Plain and ordinary meaning</p> <p><u>Intrinsic evidence</u> ’436 Patent at 9:64-10:4, 10:40-48, 10:55-11:9, 15:4-15, 16:66-17:8, Figure 5</p> <p><u>Extrinsic evidence</u> Expert opinion of Dr. Martin J. Feuerstein IPR2025-00494 Petition for Inter Partes Review of U.S. Patent No. 8,073,436, at 34 (4B-SAM_00002120–2205) IPR2025-00494 Ex. 1002, Declaration of Dr. Michael Kotzin in Support of Petition for Inter Partes Review of U.S. Patent No. 8,073,436, ¶ 263 (4B-SAM_00002486–2702)</p>

Disputed Claim Language	Plaintiffs' Proposed Construction and Support¹
<p>“silent period” (’436 Patent, claim 15)</p>	<p>Plain and ordinary meaning</p> <p><u>Intrinsic evidence</u></p> <p>’436 Patent at 2:5-18, 2:41-63, 3:8-12, 4:2-66, 7:5-34, 9:58-10:14, 11:15-28, 12:48-13:15, 17:52-58, 18:1-54, Figure 4, Figure 5, Figure 6, Figure 7, Figure 8</p> <p>’436 Patent’s reference [1]: U.S. patent application Ser. No. 11/096,721, Silent Proactive Handoff for Fast Roaming, filed Apr. 1, 2005, T. Zhang, et al., now U.S. 2006/0221900 A1, at [39], [54], claim 2 (4B-SAM_00002866–2881)</p> <p>’436 Patent’s reference [2]: U.S. patent application Ser. No. 11/161,668, Reducing Energy Consumption on Mobile Devices with WiFi or Other High Energy Consuming Network Interfaces, filed Aug. 11, 2005, to T. Zhang, et al., now U.S. 7,606,602 B2, at 3:11-13, 4:66-5:2, 11:53-59 (4B-SAM_00002882–2892)</p> <p><u>Extrinsic evidence</u></p> <p>Reducing Energy Consumption on Mobile Devices with WiFi Interfaces, Tao Zhang, Sunil Madhani, Provin Gurung, Eric van den Berg, Telcordia Technologies, IEEE Communications Society, GLOBECOM ’05 IEEE Global Telecommunications Conference proceedings, 2005, 28 November 2005 - 02 December 2005, St. Louis, MO, https://ieeexplore.ieee.org/document/1577687 (4B-SAM_00002045–2049)</p> <p>Expert opinion of Dr. Martin J. Feuerstein</p>

EXHIBIT B – DEFENDANTS’ PROPOSED CONSTRUCTIONS AND INTRINSIC AND EXTRINSIC EVIDENCE

<u>No.</u>	<u>Term</u>	<u>Patent(s)/Claim(s)</u>	<u>Samsung’s Preliminary Construction</u>	<u>Samsung’s Identification of Intrinsic and Extrinsic Evidence</u>
1	“two sample tests”	’006 patent, claims 1, 3	“calculation of a test statistic from two samples, and comparison of the test statistic to a critical value”	<p><u>Intrinsic Evidence</u></p> <p>’006 patent: 4:12-53, 7:23-8:28, 9:54-10:15, 16:57-18:44.</p> <p><u>Extrinsic Evidence</u></p> <p>A Dictionary of Statistics (2002), SAMSUNG_FB_0000093476–82, at p. 358, defines “test” by referring to “hypothesis test,” which is defined on pp. 165–67.</p> <p>Pocket Dictionary of Statistics (2002) SAMSUNG_FB_0000093595– 600, at p. 256, defines “statistical test.”</p> <p>Neave & Worthington, DISTRIBUTION-FREE TESTS (1988), SAMSUNG_FB_0000084725–960, at pp. 48-55, 143-59, describes the structure of a “statistical test,” two-sample tests.</p> <p>The expert declaration of Dr. O. Tonguz provides Dr. Tonguz’s opinions.</p>

<u>No.</u>	<u>Term</u>	<u>Patent(s)/Claim(s)</u>	<u>Samsung’s Preliminary Construction</u>	<u>Samsung’s Identification of Intrinsic and Extrinsic Evidence</u>
2	“two-sample method”	’006 patent, claim 2	“calculation of a test statistic from two samples, and comparison of the test statistic to a critical value”	<p><u>Intrinsic Evidence</u></p> <p>’006 patent: 4:12-53, 7:23-8:28, 9:54-10:15, 16:57-18:44.</p> <p><u>Extrinsic Evidence</u></p> <p>A Dictionary of Statistics (2002), SAMSUNG_FB_0000093476–82, at p. 358, defines “test” by referring to “hypothesis test,” which is defined on pp. 165–67.</p> <p>Pocket Dictionary of Statistics (2002) SAMSUNG_FB_0000093595– 600, at p. 256, defines “statistical test.”</p> <p>Neave & Worthington, DISTRIBUTION-FREE TESTS (1988), SAMSUNG_FB_0000084725–960, at pp. 48-55, 143-59, describes the structure of a “statistical test,” two-sample tests.</p> <p>The expert declaration of Dr. O. Tonguz provides Dr. Tonguz’s opinions.</p>
3	“the mobile device having limited knowledge of the quality of the current path”	’006 patent, claim 4	Indefinite	<p><u>Intrinsic Evidence</u></p>

<u>No.</u>	<u>Term</u>	<u>Patent(s)/Claim(s)</u>	<u>Samsung’s Preliminary Construction</u>	<u>Samsung’s Identification of Intrinsic and Extrinsic Evidence</u>
				<p>'006 patent: 7:23-52, 13:16-32, 16:57-17:8, 18:10-19, 19:4-47, 20:14-42.</p> <p><u>Extrinsic Evidence</u></p> <p>The expert declaration of Dr. O. Tonguz provides Dr. Tonguz’s opinions.</p>
4	“having insufficiently many measurements for an estimate of the mean quality of the current path and its variance”	'006 patent, claim 5	Indefinite	<p><u>Intrinsic Evidence</u></p> <p>'006 patent: 16:60-17:33.</p> <p><u>Extrinsic Evidence</u></p> <p>The expert declaration of Dr. O. Tonguz provides Dr. Tonguz’s opinions.</p>
5	“observations are not matched”	'006 patent, claim 5	Indefinite	<p><u>Intrinsic Evidence</u></p> <p>'006 patent: 6:64-7:22, 8:20-9:10, 15:8-16:59, 18:20-43, 19:15-20:29, Fig. 7 (and accompanying description).</p> <p><u>Extrinsic Evidence</u></p> <p>The expert declaration of Dr. O. Tonguz provides Dr. Tonguz’s opinions.</p>
6	“while ... the current network satisfies the mobile device’s requirements”	'348 patent, claim 1	Indefinite	<p><u>Intrinsic Evidence</u></p>

<u>No.</u>	<u>Term</u>	<u>Patent(s)/Claim(s)</u>	<u>Samsung's Preliminary Construction</u>	<u>Samsung's Identification of Intrinsic and Extrinsic Evidence</u>
				'348 patent: 5:41-50, 6:36-40; 6:40-45, 7:50-58, 10:35-38, 12:4-10. <u>Extrinsic Evidence</u> The expert declaration of Dr. O. Tonguz provides Dr. Tonguz's opinions.
7	"silent period of an application"	'348 patent, claim 1	"an interval (time period) during which applications running on the mobile device do not have packets to send or receive"	<u>Intrinsic Evidence</u> '348 patent: 7:59-8:13. '348 patent prosecution history: September 25, 2008 Response to Office Action (4B-SAM_00000137 - 148).
8	"actionable silent period"	'348 patent, claims 14, 15	"silent period determined by the mobile device to be long enough for the completion of one or more handoff actions"	<u>Intrinsic Evidence</u> '348 patent: 9:6-17, 9:55-10:28, 11:5-12, 11:32-35, 11:58-61, Fig. 1 (and accompanying description).
9	"after having the mobile device start said at least one handoff action"	'348 patent, claims 16, 17	Indefinite	<u>Intrinsic Evidence</u> '348 patent: claims 1 & 15, 12:4-10.
10	"silent period"	'436 patent, claim 15	"an interval (time period) where the mobile has no traffic to send or receive"	<u>Intrinsic Evidence</u> '436 patent: claim 17, 2:59-62; 7:14-29.

<u>No.</u>	<u>Term</u>	<u>Patent(s)/Claim(s)</u>	<u>Samsung’s Preliminary Construction</u>	<u>Samsung’s Identification of Intrinsic and Extrinsic Evidence</u>
				’436 patent prosecution history: February 1, 2011 Response to Office Action (4B-SAM_00000464 - 92).
11	“brief interval”	’436 patent, claims 1, 17, 19	Indefinite	<u>Intrinsic Evidence</u> ’436 patent: 4:44-51, 7:6-34, 9:55-57. <u>Extrinsic Evidence</u> The expert declaration of Dr. O. Tonguz provides Dr. Tonguz’s opinions.
12	“a desired level”	’436 patent, claim 11	Indefinite	<u>Intrinsic Evidence</u> ’436 patent: 4:9-16, 9:64-10:4.
13	“server”	’671 patent, claim 10	“An entity that creates a CBK and transfers it to the authenticator. A server is a creator as well as a sender of the CBK.”	<u>Intrinsic Evidence</u> ’671 patent: 13:31-35.
14	“EAP methods”	’671 patent, claim 10	“the authentication algorithms described in RFC 3748”	<u>Intrinsic Evidence</u> ’671 patent: 12:40-43, 4:7-10:5. <u>Extrinsic Evidence</u> The expert declaration of Dr. H. Houh provides Dr. Houh’s opinions.