

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,
Petitioner,

v.

WILUS INSTITUTE OF STANDARDS AND TECHNOLOGY INC.,
Patent Owner.

Case No. IPR2025-00933
U.S. Patent No. 11,470,595

PATENT OWNER'S PRELIMINARY RESPONSE

TABLE OF CONTENTS

I.	INTRODUCTION.....	1
II.	OVERVIEW OF THE ’595 PATENT	1
A.	Technology Overview of the ’595 Patent	2
B.	Overview of the ’595 Patent’s File History	6
III.	LEVEL OF ORDINARY SKILL IN THE ART	8
IV.	CLAIM CONSTRUCTION	8
V.	THE ALLEGED ART FAILED TO DISCLOSE AT LEAST “THE BANDWIDTH FIELD OF HE-SIG-A IS USED TO OBTAIN THE INFORMATION OF THE UNASSIGNED RESOURCE UNIT” AND “THE UNASSIGNED RESOURCE UNIT IS EXPLICITLY INDICATED WITH THE INFORMATION OF THE UNASSIGNED RESOURCE UNIT BASED ON THE BANDWIDTH FIELD AND THE AT LEAST ONE SUBFIELD”	10
A.	Ground 1A: Josiam (Ex. 1005).....	12
B.	Ground 1B: Josiam (Exs. 1005) and Seok (Ex. 1007).....	14
C.	Ground 2: Chen (Ex. 1008) and Wu (Exs. 1009).....	15
VI.	CONCLUSION	19

