

From: Alex Gelberg gelberg@fr.com
Subject: RE: Wilus Institute of Standards and Technology Inc. v. HP Inc., EDTX Case No. 2:24cv00752-JRG-RSP [Lead Case]:
Defendant's PR 4-1 Disclosure
Date: August 27, 2025 at 1:13 PM
To: Linda Xu lxu@raklaw.com, Georgette Williams GWilliams@fr.com, FISH SERVICE Samsung/Wilus
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askey-wilus@finnegan.com
Cc: rak_wilus@raklaw.com

AG

Linda,

Defendants disagree with the suggestion that there is anything improper with our PR 4-1 disclosure. The rule requires only an identification of terms that “should be construed or found indefinite”—not a delineation as to which terms should be construed and which should be found indefinite.

That said, to avoid any dispute, below we identify the terms identified in Defendants PR 4-1 disclosure that Defendants contend should be found indefinite.

11,159,210

- “a format of user field(s) included in a user specific field of the HE-SIG-B is identified based on a number of MU-MIMO users indicated by a subfield of the HE-SIG-A” (claims 1,6)

10,313,077

- “obtain[ing] length information indicating information on a duration of the non-legacy physical layer frame [after a legacy signaling field], from the legacy signaling field” (claims 1,8)
- “obtain[ing] information other than [the] information on the duration of the non-legacy physical layer frame through a remaining value obtained by dividing the length information by a data size transmittable by a symbol of a legacy physical layer frame” (claims 1, 8)
- “obtain[ing] the information other than the information on the duration of the non-legacy physical layer frame based on the remaining value and a modulation method of a third symbol after the legacy signaling field” (claims 6, 13)
- “a duration of the non-legacy physical layer frame” (claim 1)
- “the duration of the non-legacy physical layer frame after the legacy signaling field” (claim 3)
- “a duration of the non-legacy physical layer frame after a legacy signaling field” (claim 8)

10,687,281

- “obtain[ing] information of an unassigned resource unit via at least one of the bandwidth field of the HE-SIG-A and a subfield of HE-SIG-B of the received packet” (claims 1, 8)
- “predetermined index” (claims 2, 9)

11,470,595

- “explicitly indicated” (claims 1, 7)
- “the total bandwidth information” (claim 7)
- “a center 26-tone resource unit” (claims 3, 9)
- “the center 26-tone resource unit” (claims 4, 10)

11,129,163

- “valid signaling field of the MAC frame” (claim 3, 11)

- “wherein the processor is configured to signal that the operation based on the BSS color is not allowed” (claim 4, 12)
11,700,597
- “valid signaling field of the MAC frame” (claim 3, 11)
- “wherein the processor is configured to signal that the operation based on the BSS color is not allowed” (claim 4, 12)
11,116,035
- “when” (claims 1, 8)
11,516,879
- “when” (claims 1, 8)

Kind regards,
Alex

Alex Gelberg

Principal ■ Fish & Richardson P.C.

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From: Linda Xu <lxu@raklaw.com>

Sent: Monday, August 25, 2025 6:17 PM

To: Georgette Williams <GWilliams@fr.com>; FISH SERVICE Samsung/Wilus <FISHSERVICESamsungWilus@fr.com>; Service – FR HP/Wilus <ServiceFRHPWilus@fr.com>; ASKEY-Wilus <ASKEY-Wilus@finnegan.com> <askey-wilus@finnegan.com>

Cc: rak_wilus@raklaw.com

Subject: Re: Wilus Institute of Standards and Technology Inc. v. HP Inc., EDTX Case No. 2:24cv00752-JRG-RSP [Lead Case]: Defendant's PR 4-1 Disclosure

[This email originated outside of F&R.]

Counsel,

Patent Local Rule 4-1 requires the parties to identify the terms that they contend are indefinite when exchanging the list of claim terms. The list Defendants served on August 15, 2025 does not have such identifications. Thus, we assume that you do not contend that any terms are indefinite. Please let us know immediately if you believe otherwise.

Linda Xu

Russ, August & Kabat

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On Aug 15, 2025, at 3:02 PM, Georgette Williams <GWilliams@fr.com> wrote:

Counsel:

Attached please find Defendants' P.R. 4-1 Exchange of Proposed Terms and Claim Elements for Construction being served on you in the above-referenced matter.

Please feel free to contact me should you have any issues opening the file. Thank you.

Georgette Williams
Litigation Paralegal ■ Fish & Richardson P.C.

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Defendants PR 4-1 Disclosure.pdf>

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