







































































































258. Moreover, when Samsung employees publish their own research in the wireless communications field, they often cite to Prof. Rappaport's work, including his textbooks and prior publications.<sup>39</sup>

259. Samsung also has cited to Prof. Rappaport's seminal textbook – *Wireless Communications: Principles and practice*, Prentice Hall (1996) – in support of various Petitions for Inter Partes Review asserted against certain patents in the wireless space.<sup>40</sup>

260. Samsung was aware of several of the Asserted Patents based on the prosecution history of several of Samsung's own patents.

261. During prosecution of U.S. Patent Application No. 11/977,603, which is assigned to SEC and has since issued as U.S. Patent No. 8,244,266, the examiner cited the '194 Patent in support of an obviousness rejection under 35 U.S.C. 103. To overcome this rejection, SEC argued that its proposed claims were distinguishable from the '194 Patent.

262. When filing U.S. Patent Application No. 15/063,018, SEC concurrently filed an IDS citing the '358 Patent. During prosecution of that application, the examiner cited the '358 Patent in multiple office actions in support of both anticipation and obviousness rejections. In

Channel Models for Outdoor Urban Microcellular and Macrocellular Environments,” *2016 IEEE 83rd Vehicular Technology Conference (VTC Spring)*, Nanjing, China, 2016, at 1-7.

<sup>39</sup> See, e.g., W. Hong, Y. G. Kim, K. -h. Baek and Y. Lee, “Design and testing of a millimeter-wave beam-steering mesh-grid array for 5th generation (5G) mobile communication handset devices,” *2014 USNC-URSI Radio Science Meeting (Joint with AP-S Symposium)*, Memphis, TN, USA, 2014, at 282; N. A. Abbasi *et al.*, “An Ultra-Wideband Study of Vegetation Impact on Upper Midband / FR3 Communication,” *IEEE Wireless Communications Letters*, May 9, 2025; J. Gomez-Ponce *et al.*, “Impact of common reflecting and absorbing building materials on THz multipath channels,” *Radio Science*, vol. 57, no. 2, Feb. 2022 at 1-16.

<sup>40</sup> See, e.g., *Samsung Elec. Co., Ltd. v. Smart Mobile Tech., LLC*, IPR2022-01248, Petition for Inter Partes Review, p.11 (July 6, 2022); *Samsung Elec., Inc. v. Red Rock Analytics, LLC*, IPR2018-00555, Ex. 2001 (Expert Dec. of Dr. Payam Heydari), p. 23 (July 2, 2018).



















































