

EXHIBIT A

Proposed Constructions of Claim Terms/Phrases of the '916 Patent

Claims ('916)	Terms/Elements for Construction	Evolved Wireless's Proposal	Defendants' Proposal
6	“a code sequence generator for generating a code sequence having a second length by cyclic extension of a code sequence having a first length, and performing a circular shift to the code sequence having the second length”	“hardware and/or software in the apparatus that is capable of generating a code sequence having a second length by cyclic extension of a code sequence having a first length, and performing a circular shift to the code sequence having the second length” Section 112(6) does not apply because a person of ordinary skill in the art reading the specification would understand the term to have a sufficiently definite meaning as the name for the structure that performs the function. If section 112(6) applies: Function: “generating a code sequence having a second length by cyclic extension of a code sequence having a first length, and performing a circular shift to the code sequence having the second length”	This is a means plus function term governed by Section 112(6). Function: “generating a code sequence having a second length by cyclic extension of a code sequence having a first length, and performing a circular shift to the code sequence having the second length” Structure: Lacks sufficient corresponding structure, and therefore invalid as indefinite.

Claims (’916)	Terms/Elements for Construction	Evolved Wireless’s Proposal	Defendants’ Proposal
		Structure: “hardware and/or software in the apparatus that is capable of generating a code sequence having a second length by cyclic extension of a code sequence having a first length, and performing a circular shift to the code sequence having the second length”	
6	“a transmitting unit for transmitting the circular shifted code sequence having the second length”	“hardware and/or software in the apparatus that is capable of transmitting the circular shifted code sequence having the second length” Section 112(6) does not apply because a person of ordinary skill in the art reading the specification would understand the term to have a sufficiently definite meaning as the name for the structure that performs the function. If section 112(6) applies: Function: “transmitting the circular shifted code sequence having the second length” Structure: “hardware and/or software in the apparatus that is	This is a means plus function term governed by Section 112(6). Function: “transmitting the circular shifted code sequence having the second length” Structure: Lacks sufficient corresponding structure, and therefore invalid as indefinite.

Claims (’916)	Terms/Elements for Construction	Evolved Wireless’s Proposal	Defendants’ Proposal
		capable of transmitting the circular shifted code sequence having the second length”	

Proposed Constructions of Claim Terms/Phrases of the '965 Patent

Claims ('965)	Terms/Elements for Construction	Evolved Wireless's Proposal	Defendants' Proposal
8	“a sequence selecting module acquiring information about predetermined two or more random access preamble sequence sets, selecting one random access preamble sequence set from among the predetermined random access preamble sequence sets considering at least one of a size of information to be transmitted by the apparatus and a degree of a path loss, and randomly selecting a specific sequence within the selected random access sequence set”	Not indefinite. “hardware and/or software in the user equipment that is capable of performing the following algorithm: acquire information about predetermined two or more random access preamble sequence sets, select one random access preamble sequence set from among the predetermined random access preamble sequence sets considering at least one of a size of information to be transmitted by the apparatus and a degree of a path loss, and randomly select a specific sequence within the selected random access sequence set” Section 112(6) does not apply because a person of ordinary skill in the art reading the specification would understand the term to have a sufficiently definite meaning as the name for the structure that performs the function.	Indefinite. To the extent this limitation is found to be a means plus function term governed by 112(6): <u>Function:</u> “acquiring information about predetermined two or more random access preamble sequence sets, selecting one random access preamble sequence set from among the predetermined random access preamble sequence sets considering at least one of a size of information to be transmitted by the apparatus and a degree of a path loss, and randomly selecting a specific sequence within the selected random access sequence set” <u>Structure:</u> Lacks sufficient corresponding structure, and therefore invalid as indefinite.

Claims (’965)	Terms/Elements for Construction	Evolved Wireless’s Proposal	Defendants’ Proposal
		If section 112(6) applies: Function: “acquiring information about predetermined two or more random access preamble sequence sets, selecting one random access preamble sequence set from among the predetermined random access preamble sequence sets considering at least one of a size of information to be transmitted by the apparatus and a degree of a path loss, and randomly selecting a specific sequence within the selected random access sequence set” Structure: “hardware and/or software in the user equipment that is capable of performing the following algorithm: acquire information about predetermined two or more random access preamble sequence sets, select one random access preamble sequence set from among the predetermined random access preamble sequence sets considering at least one of a size of information to be transmitted by the apparatus and a degree of a path loss, and randomly select a specific sequence	

Claims (’965)	Terms/Elements for Construction	Evolved Wireless’s Proposal	Defendants’ Proposal
		within the selected random access sequence set”	
8	“an access module accessing a random access channel using the specific sequence selected by the sequence selecting module”	Not indefinite. “hardware and/or software in the user equipment that is capable of transmitting the specific selected sequence on the random access channel to the base station.” Section 112(6) does not apply because a person of ordinary skill in the art reading the specification would understand the term to have a sufficiently definite meaning as the name for the structure that performs the function. If section 112(6) applies: Function: “accessing a random access channel using the specific sequence selected by the sequence selecting module” Structure: “hardware and/or software in the user equipment that is capable of transmitting the specific selected sequence on the random access channel to the base station.”	Indefinite. To the extent this limitation is found to be a means plus function term governed by 112(6): Function: “accessing a random access channel using the specific sequence selected by the sequence selecting module” Structure: Lacks sufficient corresponding structure, and therefore invalid as indefinite.

Proposed Constructions of Claim Terms/Phrases of the '373 Patent

Claims ('373)	Terms/Elements for Construction	Evolved Wireless's Proposal	Defendants' Proposal
1, 4, 7, 8, 13, 15, 17, 23-24	"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"	To the extent this term requires construction, "handover" and "handover request" should both be construed in order to specify the meaning of "handover" when used as a noun and as an adjective. "handover" means "transfer of a terminal's connection with a source base station to a target base station" "handover request" means "a request to transfer a terminal's connection with a source base station to a target base station"
1, 3, 8, 15, 18, 20, 23-25	"target base station"	"the base station to which the source base station determines the mobile terminal will be transferred"	To the extent this term requires construction, "target base station" means "base station to which a terminal's connection may be transferred"
17	"the measurement report is used to determine"	"the measurement report is used by the source base station to determine"	No construction necessary. Evolved Wireless's proposed construction improperly inserts the words "by the source base station" into this claim limitation.

Claims (‘373)	Terms/Elements for Construction	Evolved Wireless’s Proposal	Defendants’ Proposal
24	“a radio protocol adapted to receive access information from a source base station after a handover request is accepted by the target base station and to perform a random access procedure with the target base station using the received access information, such that the access information is configured to permit the terminal to access the target base station”	Not indefinite. “hardware and/or software in the mobile terminal adapted to receive access information from a source base station after a handover request is accepted by the target base station and to perform a random access procedure with the target base station using the received access information, such that the access information is configured to permit the terminal to access the target base station, wherein the access information includes preamble information for the random access procedure, wherein the preamble information is a dedicated preamble used only for a specific terminal, and wherein the dedicated preamble is determined by the target base station” Section 112(6) does not apply because a person of ordinary skill in the art reading the specification would understand the term to have a sufficiently definite meaning as the name for the structure that performs the function.	Indefinite. To the extent this term is found to be a means plus function term governed by Section 112(6): Function: “receiving access information from a source base station after a handover request is accepted by the target base station” Structure: Lacks sufficient corresponding structure, and therefore invalid as indefinite.

Claims (‘373)	Terms/Elements for Construction	Evolved Wireless’s Proposal	Defendants’ Proposal
		If section 112(6) applies: Function: “(1) to receive access information from a source base station after a handover request is accepted by the target base station, and (2) to perform a random access procedure with the target base station using the received access information, such that the access information is configured to permit the terminal to access the target base station, wherein the access information includes preamble information for the random access procedure, wherein the preamble information is a dedicated preamble used only for a specific terminal, and wherein the dedicated preamble is determined by the target base station” Structure: “hardware and/or software in the mobile terminal adapted to receive access information from a source base station and to perform a random access procedure with the target base station using the received access information”	

Claims (’373)	Terms/Elements for Construction	Evolved Wireless’s Proposal	Defendants’ Proposal
24	“wherein the dedicated preamble is determined by the target base station”	Not indefinite.	Indefinite.
25	“an Evolved Universal Mobile Telecommunication System (E-UMTS)”	Not indefinite.	Indefinite.

Proposed Constructions of Claim Terms/Phrases of the '236 Patent

Claims ('236)	Terms/Elements for Construction	Evolved Wireless's Proposal	Defendants' Proposal
7	"a reception module adapted to receive an uplink grant (UL Grant) signal from a base station on a specific message"	"hardware and/or software in the user equipment that is capable of receiving an uplink grant signal from a base station on a specific message." Section 112(6) does not apply because a person of ordinary skill in the art reading the specification would understand the term to have a sufficiently definite meaning as the name for the structure that performs the function. If section 112(6) applies: Function: "receiving an uplink grant (UL Grant) signal from a base station on a specific message" Structure: "hardware and/or software in the user equipment that is capable of receiving an uplink grant (UL Grant) signal from a base station on a specific message"	This is a means plus function term governed by Section 112(6). Function: "receiving an uplink grant (UL Grant) signal from a base station on a specific message" Structure: Lacks sufficient corresponding structure, and therefore invalid as indefinite.
7	"a transmission module adapted to transmit data to the base station using the UL Grant signal"	"hardware and/or software in the user equipment that is capable of transmitting data to the base station"	This is a means plus function term governed by Section 112(6).

Claims (’236)	Terms/Elements for Construction	Evolved Wireless’s Proposal	Defendants’ Proposal
	received on the specific message”	using the UL Grant signal received on the specific message” Section 112(6) does not apply because a person of ordinary skill in the art reading the specification would understand the term to have a sufficiently definite meaning as the name for the structure that performs the function. If section 112(6) applies: Function: “transmit data to the base station using the UL Grant signal received on the specific message” Structure: “hardware and/or software in the user equipment that is capable of transmitting data to the base station using the UL Grant signal received on the specific message.	Function: “transmit data to the base station using the UL Grant signal received on the specific message” Structure: Lacks sufficient corresponding structure, and therefore invalid as indefinite.
7	“a Hybrid Automatic Repeat Request (HARQ) entity adapted to determine whether there is data stored in the Msg3 buffer when the reception module receives the UL Grant signal and the specific message is a random access response message, acquiring	Not indefinite. “hardware and/or software in the user equipment that is capable of determining whether there is data stored in the Msg3 buffer when the reception module receives the UL	Indefinite. To the extent this limitation is found to be a means plus function term governed by 112(6): Function: “determining whether

Claims (’236)	Terms/Elements for Construction	Evolved Wireless’s Proposal	Defendants’ Proposal
	the data stored in the Msg3 buffer if there is data stored in the Msg3 buffer when the reception module receives the UL Grant signal and the specific message is the random access response message, and controlling the transmission module to transmit the data stored in the Msg3 buffer to the base station using the UL Grant signal received by the reception module on the specific message”	Grant signal and the specific message is a random access response message, acquiring the data stored in the Msg3 buffer if there is data stored in the Msg3 buffer when the reception module receives the UL Grant signal and the specific message is the random access response message, and controlling the transmission module to transmit the data stored in the Msg3 buffer to the base station using the UL Grant signal received by the reception module on the specific message. Section 112(6) does not apply because a person of ordinary skill in the art reading the specification would understand the term to have a sufficiently definite meaning as the name for the structure that performs the function. If section 112(6) applies: Function: “determining whether there is data stored in the Msg3 buffer when the reception module receives the UL Grant signal and the specific message is a random access	there is data stored in the Msg3 buffer when the reception module receives the UL Grant signal and the specific message is a random access response message, acquiring the data stored in the Msg3 buffer if there is data stored in the Msg3 buffer when the reception module receives the UL Grant signal and the specific message is the random access response message, and controlling the transmission module to transmit the data stored in the Msg3 buffer to the base station using the UL Grant signal received by the reception module on the specific message” Structure: Lacks sufficient corresponding structure, and therefore invalid as indefinite.

Claims (‘236)	Terms/Elements for Construction	Evolved Wireless’s Proposal	Defendants’ Proposal
		response message, acquiring the data stored in the Msg3 buffer if there is data stored in the Msg3 buffer when the reception module receives the UL Grant signal and the specific message is the random access response message, and controlling the transmission module to transmit the data stored in the Msg3 buffer to the base station using the UL Grant signal received by the reception module on the specific message” Structure: “hardware and/or software in the user equipment that is capable of determining whether there is data stored in the Msg3 buffer when the reception module receives the UL Grant signal and the specific message is a random access response message, acquiring the data stored in the Msg3 buffer if there is data stored in the Msg3 buffer when the reception module receives the UL Grant signal and the specific message is the random access response message, and controlling the transmission module to transmit the data stored in the Msg3 buffer to the base station using the UL Grant	

Claims ('236)	Terms/Elements for Construction	Evolved Wireless's Proposal	Defendants' Proposal
		signal received by the reception module on the specific message"	
7	"a multiplexing and assembly entity used for transmission of new data"	Not indefinite. "hardware and/or software in the user equipment that is capable of transmitting new data" Section 112(6) does not apply because a person of ordinary skill in the art reading the specification would understand the term to have a sufficiently definite meaning as the name for the structure that performs the function. If section 112(6) applies: Function: "transmitting new data" Structure: "hardware and/or software in the user equipment that is capable of transmitting new data"	Indefinite. To the extent this limitation is found to be a means plus function term governed by Section 112(6): Function: "transmitting new data" Structure: Lacks sufficient corresponding structure, and therefore invalid as indefinite.
7	"wherein the HARQ entity acquires the new data to be transmitted from the multiplexing and assembly entity if there is no data stored in the Msg3 buffer when the reception module receives the UL Grant signal on the specific message or the received	Not indefinite.	Indefinite.

Claims (‘236)	Terms/Elements for Construction	Evolved Wireless’s Proposal	Defendants’ Proposal
	message is not the random access response message, and controls the transmission module to transmit the new data acquired from the multiplexing and assembly entity using the UL Grant signal received by the reception module on the specific message”		
8	“wherein the HARQ entity transfers the data acquired from the multiplexing and assembly entity or the Msg3 buffer to a specific HARQ process of the one or more HARQ processes and controls the specific HARQ process to transmit the data acquired from the multiplexing and assembly entity or the Msg3 buffer through the transmission module”	Not indefinite.	Indefinite.
9	“wherein, when the specific HARQ process transmits the data stored in the Msg3 buffer through the transmission module, the data stored in the Msg3 buffer is controlled to be copied into a specific HARQ buffer corresponding to the specific HARQ process, and the data copied into the specific HARQ buffer is controlled to be transmitted through the transmission module”	Not indefinite.	Indefinite.

Claims (’236)	Terms/Elements for Construction	Evolved Wireless’s Proposal	Defendants’ Proposal
10	“wherein the UL Grant signal received by the reception module on the specific message is a UL Grant signal received on a Physical Downlink Control Channel (PDCCH)”	Not indefinite.	Indefinite.
10	“wherein the HARQ entity controls new data to be transmitted in correspondence with the received UL Grant signal received on the PDCCH”	Not indefinite.	Indefinite.
12	“wherein the data stored in the Msg3 buffer is a Medium Access Control Protocol Data Unit (MAC PDU) including a user equipment identifier”	Not indefinite.	Indefinite.
13	“wherein the UL Grant signal received on the specific message is either a UL Grant signal received on a Physical Downlink Control Channel (PDCCH) or a UL Grant signal received on the random access response message”	Not indefinite.	Indefinite.

Proposed Constructions of Claim Terms/Phrases of the '481 Patent

Claims ('481)	Terms/Elements for Construction	Evolved Wireless's Proposal	Defendants' Proposal
8	“a preamble generation unit configured to generate said preamble sequence by repeating a specific sequence, having a length (L), N times to generate a consecutive sequence having a length (N*L) and concatenating a single cyclic prefix (CP) to a front end of said consecutive sequence”	“hardware and/or software in the transmitter that is capable of performing the following algorithm: repeat a specific sequence, having a length (L), N times to generate a consecutive sequence having a length (N*L) and concatenate a single cyclic prefix (CP) to a front end of said consecutive sequence” Section 112(6) does not apply because a person of ordinary skill in the art reading the specification would understand the term to have a sufficiently definite meaning as the name for the structure that performs the function. If section 112(6) applies: Function: “generating said preamble sequence by repeating a specific sequence, having a length (L), N times to generate a consecutive sequence having a length (N*L) and concatenating a single cyclic prefix (CP) to a front end of said	This is a means plus function term governed by Section 112(6). Function: “generating said preamble sequence by repeating a specific sequence, having a length (L), N times to generate a consecutive sequence having a length (N*L) and concatenating a single cyclic prefix (CP) to a front end of said consecutive sequence” Structure: Lacks sufficient corresponding structure, and therefore invalid as indefinite.

Claims (‘481)	Terms/Elements for Construction	Evolved Wireless’s Proposal	Defendants’ Proposal
		consecutive sequence” Structure: “hardware and/or software in the transmitter that is capable of performing the following algorithm: repeat a specific sequence, having a length (L), N times to generate a consecutive sequence having a length (N*L) and concatenate a single cyclic prefix (CP) to a front end of said consecutive sequence”	
8	“a transmission unit configured to transmit, on a random access channel, said preamble sequence to a receiving side”	“hardware and/or software in the transmitter capable of transmitting the preamble sequence on the random access channel to a receiving side” Section 112(6) does not apply because a person of ordinary skill in the art reading the specification would understand the term to have a sufficiently definite meaning as the name for the structure that performs the function. If 112(6) applies:	This is a means plus function term governed by Section 112(6). Function: “transmitting, on a random access channel, said preamble sequence to a receiving side” Structure: Lacks sufficient corresponding structure, and therefore invalid as indefinite.

Claims (’481)	Terms/Elements for Construction	Evolved Wireless’s Proposal	Defendants’ Proposal
		Function: “transmitting, on a random access channel, said preamble sequence to a receiving side” Structure: “hardware and/or software in the transmitter capable of transmitting the preamble sequence on the random access channel to a receiving side”	