

Subject: TQ Delta v. Nokia - Amended Invalidity Contentions and Prior Art Elections
Date: Thursday, July 28, 2022 at 6:25:41 PM Central Daylight Time
From: Wroblewski, Karlee
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CC: Nokia309, Ong, Andrew
Attachments: EDTX TQ Delta v Nokia - Amended IVC Cover Pleading (2022.07.28).pdf

Counsel,

Pursuant to this Court's Local Patent Rule 3-6(a), Nokia serves its amended invalidity contentions in view of the Court's claim construction order. In addition, in view of the claim construction order and TQ Delta's claim election, Nokia revises its prior art election as follows:

Family 1: U.S. Patent No. 7,570,686 ("the '686 Patent")

- ITU-T Recommendation G.712 (11/1996)
- U.S. Patent No. 6,891,803 to Chang
- U.S. Patent No. 6,606,719 to Ryckebusch
- Network and Customer Installation Interfaces – Asymmetric Digital Subscriber Line (ADSL) Metallic Interface ("T1.413-1998")
- **ITU-T Recommendation G.992.1 (06/99) ("ITU-T G.992.1")**
 - U.S. Patent No. 6,636,603 to Milbrandt
 - SAD-Golden ATU-C/ Speed Touch ADSL Modem
 - U.S. Patent No. 6,590,893 to Hwang

Family 2: U.S. Patent No. 9,300,601 ("the '601 Patent"); U.S. Patent No. 9,894,014 ("the '014 Patent")

- Alcatel A1000 ASAM ADSL (01/1999)
- U.S. Patent No. 7,068,657 to Keller-Tuberg
- U.S. Patent No. 5,799,014 to Kozaki
- U.S. Patent No. 6,665,733 to Witkowski
- **U.S. Patent No. 8,178,448 to Gray**
- **WO1999039468A3 to Edvardsen**
- U.S. Patent No. 6,222,858 to Counterman

Family 3: 7,844,882 ("the '882 Patent"); 8,495,473 ("the '5473 Patent"); 9,547,608 ("the '608 Patent")

- ITU-T G.993.1 (6/2004), Very High Speed Digital Subscriber Line Transceivers
- U.S. Patent No. 7,269,208 to Mazzoni
- U.S. Patent No. 6,707,822 to Fadavi-Ardekani et al.
- U.S. Patent No. 5,912,898 to Khoury
- ITU-T SG15/Q4 contribution LB-031, titled "VDSL2 – Constraining the Interleaver Complexity"

Family 4: 8,090,008 ("the '008 Patent")

- A Method to Reduce the Probability of Clipping in DMT-Based Transceivers" by Denis J. G. Mestdagh and Paul M. P. Spruyt
- A Comparison of Peak Power Reduction Schemes for OFDM" by Stefan H. Müller and Johannes B. Huber
- U.S. Patent No. 6,625,219 to Stopler
- U.S. Patent No. 6,657,949 to Jones

TQ Delta Exhibit 2009
COMMScope, INC. v. TQ DELTA, LLC
IPR2022-00833

- U.S. Patent No. 5,682,376 to Hayashino
- U.S. Patent No. 6,590,893 to Hwang

Family 6: U.S. Patent No. 8,594,162 (“the ’162 Patent”); U.S. Patent No. 10,567,112 (“the ’112 Patent”)

- Temporary Document SC-060 titled “G.gen, G.dmt, G.lite.bis: Protocol for On-Line Reconfiguration of ADSL
- U.S. Patent Pub. No. US2002/0172188 to Wunsch
- ITU-T Recommendation G.992.1 (06/99) (“ITU-T G.992.1”)

Family 9:

8,468,411 (“the ’411 Patent”)

- ITU-T G.993.1 (6/2004), Very High Speed Digital Subscriber Line Transceivers
- ITU-T Recommendation G.992.3 (01/2005)
- Wireless Video Transport Using Conditional Retransmission and Low-Delay Interleaving” by Aramvith et. Al.
- U.S. Patent Application Publication No. 2005/0254508 to Aksu et al.
- 3GPP TR25.896 v6.0.0
- 3GPP TS25.401 v6.0.0
- U.S. Patent No. 6,865,233 to Eriksson

9,094,348 (“the ’348 Patent”); 10,833,809 (“the ’809 Patent”)

- ITU-T G.993.1 (6/2004), Very High Speed Digital Subscriber Line Transceivers
- U.S. Patent No. 8,775,890 to Yap, et al.
- ITU-T Recommendation G.992.3 (01/2005)
- “Interleaved FEC/ARQ coding for QoS multicast over the Internet” by Chen et al.

9,485,055 (“the ’055 Patent”)

- ETSI TS 125 322 v 4.0.0 (2001-03)
- EP 1,507,353 A2 to Kawakami et al.
- U.S. Patent No. 8,644,341 to Petranovich
- ITU-T G.993.1 (6/2004), Very High Speed Digital Subscriber Line Transceivers

Family 10: U.S. Patent No. 9,154,354 (“the ’354 Patent”); U.S. Patent No. 8,937,988 (“the ’988 Patent”)

- U.S. Patent No. 6,205,410 to Cai
- EP 0753948A1 to Peeters et al.
- U.S. Patent No. 6,516,027 to Kapoor et al.

Best,
Karlee

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