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Subject: TQ Delta, LLC v. CommScope Holding Company, Inc. et al, No. 2:21-cv-00310-JRG (EDTX) - Nokia's Preliminary Election of Prior Art
Date: Wednesday, May 18, 2022 4:04:11 PM

Counsel,

Nokia submits the following preliminary election of asserted prior art. In addition, Nokia intends to ask the Court for clarification regarding the meaning of “total” asserted claims and “total” references in paragraph 2 of the Narrowing Order. Specifically, Nokia believes the Order was intended to limit the number of claims and prior art references across the consolidated case.

Accordingly, please let us know your availability for a meet and confer on either Thursday or Friday of this week. Nokia will otherwise reach out to the Court by this Friday afternoon.

Nokia’s Preliminary Election of Asserted Prior Art:

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 (“T1.413-1995”)
- 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”); U.S. Patent No. 9,014,193 (“the ’193 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
- 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”); 10,409,510 (“the ’510 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
- 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 G.992.1, Series G: Transmission Systems and Media, Digital Systems and Networks

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

8,595,577 (“the ’577 Patent”); 9,094,348 (“the ’348 Patent”); 10,044,473 (“the ’4473 Patent”); and 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

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.

Sincerely,

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