EXHIBIT C

EXHIBIT C – DEFENDANTS' IDENTIFICATION OF INTRINSIC AND EXTRINSIC EVIDENCE

Terms & Relevant Claims	Defendants' Proposed Constructions	Intrinsic Evidence	Extrinsic Evidence
channel pool	"The set of orthogonal channels available to a central terminal to use to establish wireless links"	'327 Patent: Abstract; Figs. 16 and 17; Cols. 3:4-22, 3:31-40, 10:46-11:11, 14:9-19, 23:13-46, 24:10-26:22, and 28:14-20; and Claims 1-7, 11, and 21-27. '327 Prosecution History: Mar. 16, 2000 Office Action; June 20, 2000 Response to Examiner's Action.	*Newton's Telecom Dictionary*, p. 657 (21st ed. 2005)
orthogonal channel(s)	"A communication channel defined by an orthogonal code"	'326 Patent: Abstract; Table 1; Cols. 1:33-55, 4:48-5:4, 10:49-55, 11:16-19, and 15:1-15; and Claims 1-2 and 5-15. '819 Patent: Abstract; Cols. 1:45-55, 2:54-65, 3:2-6, 4:48-65, 23:60-63; and Claims 1, 7-12, 18-25, and 27-32. '327 Patent: Col. 1:36-38 and Claims 10 and 13-16. '211 Patent: Abstract; 1:51-60, 2:12-64, 3:2-35, 3: 50-4: 49, 4:61-5:38,	*Collins Dictionary of Electronics*, p. 293 (2nd ed. 2007). U.S. Patent No. 5,533,013, including 3:24-27; 3:42-44 *The IEEE Wireless Dictionary*, 2d ed. 2011 (def'n of "channel").

		18:7-12, 18:50-67, 19:8-18, 19:46-49, and 24:51-59; and Claims 1, 2, and 5-10.	
overlay code	"A second code applied in series with the orthogonal code"	'326 Patent: Abstract; Figs. 7A, 7B, 8A, 8B, 9A, and 12; Cols. 11:52-67, 12:11-20, 12:34-42, 12:63-13:6, 13:50-14:5, 15:1-50, 16:24-41, 19:8-18, and 20:40-58; and Claims 2, 5 9-11, and 13. '819 Patent: Abstract; Figs. 7A, 7B, 8A, 8B, 9A, and 12; Cols. 2:54-65, 3:7-20, 5:18-22, 11:42-67, 12:15-23, 12:43-67, 13:29-14:10, 14:44-15:27, 16:1-8, 18:25-35, 19:58-67, and 23:37-48; and Claims 1-2, 4, 6-10, 12-13, 15, and 17-32. '327 Patent: Figs. 7A, 7B, 8A, 8B, 9A, and 12; Cols. 5:28-39, 12:39-13:67, 14:9-19, 14:33-41, 14:61-15: 26, 15:48-16:3, 16:66-17:52, 18:25-32, 20:59-21:2, and 22:21-40; and Claims 13 and 14.	*The IEEE Standard Dictionary of Electrical and Electronics Terms*, p. 168 (6th ed. 1996) *Newton's Telecom Dictionary*, pp. 196, 617 (21st ed. 2005) Airspan 60 Digital Radio System – Trinity ASIC : Functional Requirement Specification, including p. 10; (AS 00371) DSC Communications Corporation – Invention Disclosure Form (10/6/95), including p. 1; (AS 00040) EMAIL from P. Struhsaker to M. Lysejko. Oct. 24, 1995; (AS 00048-00049) Airspan DA – Radio Interface Architecture, including p. 8; Jan 1997;

		’211 Patent: Abstract; Figs. 7A, 7B, 8A, 8B, 9A, 12, 15A, and 15B; Cols. 3:6-35, 4:28-40, 4:44-52, 11:59-12:34, 12:48-56, 13:12-20, 14: 1-18, 14:37-45, 15:14-67, 16:39-59, 19:8-18, 20:40-58, and 24:35-39; and Claims 2, 5, 7, and 8. U.S. Patent No. 5,956,345: including Fig. 4 and Cols. 4:54-63.	(AS 00332) *Oxford Dictionaries* (2011) http://oxforddictionaries.com (16 Nov. 2011) (def’n of “overlay”). DSC Communications Corporation – Invention Disclosure Form (10/6/95), including p. 1; (AS 00021) AS60 CDMA Waveform Enhancements, including p.3, Sept. 11, 1996; (AS 00377) Demand Assignment/Fixed Assignment CDMA Wireless Local Loop Standard, including p. 7; (AS 00529) Demand Assignment/Fixed Assignment CDMA Wireless Local Loop Standard, including p. 21; (AS 00530) Airspan DA – Radio Interface Architecture,

			including p. 7; Jan 1997; (AS 00331) Tiedemann, E., "CDMA for Cellular and PCS," including Fig. 4-2 and p. 286 Zehavi, E. et al., "The PCS CDMA System Overview," including Fig. 1 and p. 86.
parameters pertaining to a wireless link within the cell indicative of whether that wireless link is subject to interference from signals generated by said other cells	"Two or more indicators that an individual wireless link is experiencing interference from other cells"	'327 Patent: Abstract; Fig. 17; Cols. 2:16-3:3, 3:31-53, 12:33-38, and 24:37-25:60; and Claims 1-3, 6-7, 21, and 23-24. '327 Prosecution History: Mar. 16, 2000 Office Action; June 20, 2000 Response to Examiner's Action.	
subscriber terminal	"A fixed-location device"	'326 Patent: Figs. 1, 2A, 2B, and 11; Cols. 6:61-7:4 and 15:66-16:15. '819 Patent: Abstract; Figs. 1, 2A, 2B, and 11; and Cols. 6:52-62, 6:63-7:25, 13:51-14:29, and 15:43-59. '327 Patent: Figs. 1, 2A,	Airspan DA – Architecture Design Overview, including p. 16, (AS00305) Demand Assignment/Fixed Assignment CDMA Wireless Local Loop Standard, including p. 5; (AS 00515)

		2B, and 11; Cols. 8:47-53 and 18:1-16. '211 Patent: Abstract; Figs. 1, 2, 2A, 2B, 4, 11, 17, and 19A; Cols. 1:21-33, 1:65-67, 2:2-4, 2:13-16, 2:37-39, 3:53-58, 4:1-14, 4:21-24, 4:31-65, 5:16-18, 6:44-55, 7:3-44, 8:35-39, 8:44-46, 8:58-66, 9:5-8, 9:19-22, 10:6-8, 10:19-24, 10:32-36, 11:49-51, 11:56-58, 12:47-49, 12:51-53, 12:60-63, 13:1-4, 13:45-53, 13:53-62, 14:1-67, and 16:15-17:9, 17:20-24, 17:61-18:41, 19:1-41, 19:49-60, 20:7-8, 20:10-13, 20:14, 20:16-22, 20:23-32, 20:39-22:42, 23:28-34, 23:44-46, 23:47-50, 23:57-64, 24:1-5, 24:6-8, 24:8-10, 24:35-39, 24:46-50, 24:60-25:10, 25:28-29, 25:37-39, 25:46-49, 25:52-58, 25:61-26:20, and 27:5-28:26; and Claims 1, 5, and 6.	Demand Assignment/Fixed Assignment CDMA Wireless Local Loop Standard, including p. 8; (AS 00517) Demand Assignment/Fixed Assignment CDMA Wireless Local Loop Standard, including p. 9; (AS 00518)
time division multiplexing (TDM) techniques	"Methods in which a communication channel is shared among multiple wireless links by allowing each link to use the channel for a given period of time	'326 Patent: Figs. 7B, 9B, 13A, 13B, 15A, and 15B; Table 4; Cols. 2:51–60, 3:56- 4:12, 12:17-33, 13:6–	DSC Communications Corporation – Invention Disclosure Form (10/6/95), including p. 1; (AS 00021)

TDM techniques	in a defined, repeated sequence"	59, 15:38-50, 17:8-50, and 18:11-19:18; and Claims 1, 5-8, 11-12, 14, and 15. '819 Patent: Figs. 7B, 9B, 13A, 13B, 15A, and 15B; Table 4; Cols. 3:52-61, 11:64-12:13, 12:54-13:38, 15:14-27, 16:42-17:2, and 17:28-55; and Claim 11. '327 Patent: Figs. 7B, 9B, 13A, 13B, 15A, and 15B; Table 4; Cols. 6:25-34, 14: 9-32, 15:5-57, 17:39-52, 18:66-19:32, and 19:62-21:2; and Claim 15. '211 Patent: Abstract; Figs. 9B, 13A, 13B, 14A, 14B, and 15A; Summary of the Invention; Cols. 13:43-15:2, 17:35-18:38, and 18:50-19:7; and Claims 1, 2, 5-7, and 8-10. U.S. Patent No. 5,894,473: including Fig. 8; and Cols. 5:57-6:14 and 14:33-67. U.S. Patent No. 5,481,533: including Figs. 2, 3A, and	DSC Communications Corporation – Invention Disclosure Form (10/6/95), including p. 3; (AS 00023) DSC Communications Corporation – Invention Disclosure Form (10/6/95), including p. 7; (AS 00044) Airspan DA – Radio Interface Architecture, including p. 7; Jan 1997; (AS 00331) Airspan DA – Radio Interface Architecture, including p.15; Jan 1997; (AS 00339) Airspan DA – Radio Interface Architecture, including p. 17; Jan 1997; (AS 00341) *IEEE Standard Dictionary of Electrical and Electronics Terms*, p. 1115 (6th ed. 1996)

		3B; Cols. 2:41-57, 3:4-4:10, and 5:12-19.	*McGraw-Hill Concise Encyclopedia of Science and Technology*, p. 658 (3d ed. 1994) *Newton's Telecom Dictionary*, p. 606 (11th ed. 1996) *The Illustrated Dictionary of Electronics*, p. 642 (6th ed. 1994) *Wireless Communications: Principles & Practice*, at 400-01 (1st ed. 1996) Ramjee Prasad, "CDMA for Wireless Personal Communications," including pp. 20-21 (1996)
Plaintiff's proposed term: ***a TDM decoder arranged to extract a data item from a predetermined time slot within said orthogonal channel*** ***Defendants' proposed term:***	"A device used to extract information from a communication channel that is shared among multiple wireless links by allocating a given period of time to each such link in a defined, repeated sequence"	'326 Patent: Figs. 7B, 9B, 13A, and 15A; Table 4; and Cols. 2:51–60, 3:56-4:12, 13:6–59, 15:38–50, and 18:11–37. '819 Patent: Figs. 7B, 9B, 13A, 15A; Table 4; and	DSC Communications Corporation – Invention Disclosure Form (10/6/95), including p. 1; (AS 00021) DSC Communications Corporation – Invention Disclosure Form (10/6/95),

TDM decoder		Cols. 3:52-61, 12:54-13:38, 15:14-27, and 17:28-55. '327 Patent: Figs. 7B, 9B, 13A, 15A; Table 4; and Cols. 6:25-34, 14:9-18, 15:5-57, 17:39-52, and 19:62-20:21. '211 Patent: Figs. 7B, 8A, 9B; 13A, 13B, 14A, 14B, and 15A; Cols. 2:50-51, 3:21-22, 13:43-15:2, 17:35-18:38, and 18:50-19:7; and Claims 1, 2, and 5-7. U.S. Patent No. 5,894,473: including Fig. 8; Cols. 5:57-6:14, and 14:33-67. U.S. Patent No. 5,481,533: including Figs. 2, 3A, 3B; Cols. 2:41-57, 3:4-4:10, and 5:12-19.	including p. 3; (AS 00023) DSC Communications Corporation – Invention Disclosure Form (10/6/95), including p. 7; (AS 00044) Airspan DA – Radio Interface Architecture, including p. 7; Jan 1997; (AS 00331) Airspan DA – Radio Interface Architecture, including p.15; Jan 1997; (AS 00339) Airspan DA – Radio Interface Architecture, including p. 17; Jan 1997; (AS 00341) *IEEE Standard Dictionary of Electrical and Electronics Terms*, p. 1115 (6th ed. 1996) *McGraw-Hill Concise Encyclopedia of Science and Technology*, p. 658 (3d ed. 1994)

			Newton's Telecom Dictionary, p. 606 (11th ed. 1996) *The Illustrated Dictionary of Electronics*, p. 642 (6th ed. 1994) *Wireless Communications: Principles & Practice*, at 400-01 (1st ed. 1996) Ramjee Prasad, "CDMA for Wireless Personal Communications," including pp. 20-21 (1996)
Plaintiff's proposed term: ***a TDM encoder arranged to apply time division multiplexing (TDM) techniques*** ***Defendants' proposed term:*** ***TDM encoder***	"A device that applies time division multiplexing (TDM) techniques to share a communication channel among multiple wireless links"	'326 patent: Figs. 13A, 13B, 15A, and 15B; Cols. 4:13-19 and 13:29-59; and Claims 1, 2, 5, 8, 9, 10, and 11. '819 patent: Figs. 13A, 13B, 15A, and 15B; Cols. 3:52-61 and 13:9-37; and Claim 11. '327 patent: Figs. 13A, 13B, 15A, and 15B; Col.	Newton's Telecom Dictionary, p. 307 (21st ed. 2005)

		15:27-57; and Claim 15.	
time slot	"A period of time during which a single wireless link is permitted to use a shared communication channel"	'326 Patent: Figs. 13A and 13B; Cols. 3:56-4:12 and 17:32-44; and Claims 1, 5, 7, 11, 12, 15. '327 Patent: Figs. 13A, 13B, 15A, and 15B; Col. 19:12-25; and Claims 15 and 16. '211 Patent: Abstract; Figs. 9B, 13A, 13B, 14A, 14B, and 15A; Cols. 2:50-51, 5:28-32, 13:43-15:2, 17:35-18:38, and 18:50-19:7; and Claims 1, 5, 6, and 10. U.S. Patent No. 5,894,473: Fig. 8; and Cols. 5:57-6:14, and 14:33-67. U.S. Patent No. 5,481,533: Figs. 2, 3A, and 3B; and Cols. 2:41-57, 3:4-4:10, and 5:12-19.	*IEEE Standard Dictionary of Electrical and Electronics Terms*, p. 1111 (6th ed. 1996) *Newton's Telecom Dictionary*, p. 607 (11th ed. 1996) *The Computer Glossary*, p. 400 (7th ed. 1995)

channelisation means for determining which of the orthogonal channels will be subject to TDM techniques, and for transmitting that information to a plurality of subscriber terminals • ’326 patent, claim 6	Indefinite under 35 U.S.C. § 112		
channelisation means also determines, for those orthogonal channels subject to TDM techniques, how many time slots will be provided within each orthogonal channel • ’326 patent, claim 7	Indefinite under 35 U.S.C. § 112		
channelisation means for determining which of the orthogonal channels will be subject to overlay codes, and for transmitting that information to a plurality of subscriber terminals • ’819 patent, claim 10	Indefinite under 35 U.S.C. § 112		