

Proposed Claim Constructions from Dr. Quinlan's Declarations

Term	GM Case Declaration (dated 12/02/2022)	Bosch Case Declaration (dated 02/01/2024)	IPR2022-00292 / IPR2022-00293 Declarations (dated 12/09/2022)
"lift"	No opinion offered.	"The displacement of the valve [needle ('829 patent) / member ('138 patent)] away from its closed / seated position to its open position"	No construction of any term proposed. All terms can be "afforded their plain and ordinary meaning."
"valve needle"	"Valve consisting of a slender elongated pointed rod that directly seals interior chamber from combustion chamber"	"A slender elongated valve component that cooperates with a valve seat to seal or unseal the interior chamber from the combustion chamber"	No construction of any term proposed. All terms can be "afforded their plain and ordinary meaning."
"valve member"	"Member that directly seals interior chamber from combustion chamber"	"Valve component that cooperates with a valve seat to seal or unseal the interior chamber from the combustion chamber"	No construction of any term proposed. All terms can be "afforded their plain and ordinary meaning."
"fluid passage from said interior chamber to said combustion chamber"	"Passage for fuel to flow from the interior chamber to the combustion chamber"	"Passage for fuel to flow from the interior chamber to the combustion chamber."	No construction of any term proposed. All terms can be "afforded their plain and ordinary meaning."
"interior chamber"	No opinion offered.	"Volume from which high pressure fuel is injected into the combustion chamber when the valve is actuated"	No construction of any term proposed. All terms can be "afforded their plain and ordinary meaning."
"passive hydraulic link"	"Sealed hydraulic fluid transmitting actuating forces but not employed to generate an actuating force"	No opinion offered.	No construction of any term proposed. All terms can be "afforded their plain and ordinary meaning."

