UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C. 20436

Before the Honorable MaryJoan McNamara
Administrative Law Judge

In the Matter of **CERTAIN SOFT PROJECTILE LAUNCHING DEVICES, COMPONENTS THEREOF, AMMUNITION, AND PRODUCTS CONTAINING SAME**	**Inv. No. 337-TA-1325**

POST-HEARING JOINT CLAIM CONSTRUCTION CHART

Pursuant to Ground Rule 1.14 and Order No. 6 (Adopted Procedural Schedule), Complainants Hasbro, Inc. ("Hasbro") and Spin Master, Inc. ("Spin Master") (collectively "Complainants") and Respondents Gel Blaster, Inc., Shenzhen Yi Jin Electronics Science (a/k/a "Shenzhen Yi Jin Electronics" and/or "Yi Jin Electronics Science"), Guangdong Yu Lee Technology Corporation, and Yu Lee Company Ltd. (collectively, the "Gel Blaster Respondents"); Splat-R-Ball, LLC, Daisy Manufacturing Company (d/b/a "Daisy Outdoor Products"), and S-Beam Precision Products Ltd. (collectively, the "Splat-R-Ball Respondents"); and Prime Time Toys LLC, Prime Time Toys Ltd., and Easebon Services Ltd. (collectively, the "PTT Respondents") (the Gel Blaster Respondents, Splat-R-Ball Respondents, and PTT Respondents collectively as "Respondents") (collectively, "private parties") respectfully submit this Post-Hearing Joint Claim Construction Chart..

Per the discussion during the *Markman* hearing, the parties will submit reply *Markman* briefs on Tuesday, November 29, 2022.

Petitioner Gel Blaster, Inc. - Ex. 1020, 0001

I. U.S. PATENT NO. 8,371,282

A. Disputed Terms

	Term	Claim(s)	Proposed By	Complainants' Construction	Respondents' Construction	Staff's Construction
1	"super absorbent polymer"	1	Gel Blaster	Plain and ordinary meaning, i.e., "polymer that can absorb an extremely large amount of liquid relative to its own mass"	PTT and Splat-R-Ball: No construction necessary; term of art known to those skilled in the art at the time of the alleged invention Gel Blaster: Indefinite	No construction necessary; term of art known to those skilled in the art at the time of the alleged invention
2	'282 patent claim 1 preamble "ammunition configured for use with a projectile launcher"	1 (and any asserted dependent claims)	Staff	Limiting	Preamble of claim 1 is not limiting as to claims 6, 8, 13, 14, 15, 17, 19, 20, and 21 Preamble of claim 1 is limiting for dependent claim 3	Limiting
3	"the super absorbent polymer has a cross linking density sufficient to prevent the soft-projectiles from breaking apart	13	Staff	No construction needed	Indefinite	Indefinite

	when launched from the projectile launcher”					
4	“a firing mechanism that directly applies a force to a soft-projectile”	17	Respondents	Plain and ordinary meaning, i.e. “a firing mechanism that directly applies a force to a soft-projectile”	“a firing mechanism that directly applies a force to a soft-projectile (not via an intermediary)”	Plain and ordinary meaning
5	“the absorbency of the super absorbent polymer is sufficiently limited to allow the soft-projectiles to be launched from the projectile launcher without breaking apart”	21	Staff	No construction needed	Indefinite	Indefinite

II. U.S. PATENT NO. 8,640,683

A. Disputed Terms

	Term	Claim(s)	Proposed By	Complainants' Construction	Respondents' Construction	Staff's Construction
1	"super absorbent polymer"	1	Gel Blaster	Plain and ordinary meaning, i.e., "polymer that can absorb an extremely large amount of liquid relative to its own mass"	PTT and Splat-R-Ball: No construction necessary; term of art known to those skilled in the art at the time of the alleged invention Gel Blaster: Indefinite	No construction necessary; term of art known to those skilled in the art at the time of the alleged invention
2	"the super absorbent polymer has a cross linking density sufficient to prevent the soft-projectiles from breaking apart when launched from the projectile launcher"	10	Staff	No construction needed	Indefinite	Indefinite
3	"a firing mechanism that directly applies a force to the ammunition"	14	Respondents	Plain and ordinary meaning, i.e. "a firing mechanism that directly applies a force to the ammunition"	"a firing mechanism that directly applies a force to the ammunition (not via an intermediary)"	Plain and ordinary meaning

Dated: November 22, 2022

Respectfully submitted,

By: */s/ Megan J. Redmond*

Megan J. Redmond
Adam P. Seitz
Carrie A. Bader
ERISE IP
7015 College Blvd., Ste 700
Overland Park, KS 66211
spinmaster_1325@eriseip.com

Tyler Knox
ERISE IP
5299 DTC Blvd., Ste 1340
Greenwood Village, CO 80111
spinmaster_1325@eriseip.com

ATTORNEYS FOR COMPLAINANT SPIN MASTER, INC.

By: */s/Brian P. Boyd*

Ruffin B. Cordell
Jack R. Wilson
Irene Hwang
Linhong Zhang
FISH & RICHARDSON P.C.
1000 Maine Ave SW
Washington, D.C. 20024
Phone: (202) 783-5070
HasbroFRService_337-1325@fr.com

Brian P. Boyd
FISH & RICHARDSON P.C.
1180 Peachtree St. NE, 21st Floor
Atlanta, GA 30309
Phone: (404) 892-5005
HasbroFRService_337-1325@fr.com

Jeffrey Shneidman
Autumn Wu
Alex Pechette
FISH & RICHARDSON P.C.
One Marina Park Drive
Boston, MA 02210-1878
Phone: (617) 542-5070
HasbroFRService_337-1325@fr.com

David Barkan
FISH & RICHARDSON P.C.
500 Arguello Street, Ste 400
Redwood City, CA 94063
HasbroFRService_337-1325@fr.com

David Hoffman
FISH & RICHARDSON P.C.
111 Congress Ave, Ste 810
Austin, TX 78701
HasbroFRService_337-1325@fr.com

ATTORNEYS FOR COMPLAINANT HASBRO, INC.

By: */s/ Scott W. Doyle*
Paul C. Rosenthal
Scott W. Doyle
Elizabeth Johnson
Melissa Byroade
KELLEY DRYE & WARREN LLP
Washington Harbour, Suite 400
3050 K Street, NW
Washington, DC 20007
Phone: (202) 342-8400
GelBlasterTeam@KelleyDrye.com

Steven Yovits
Douglas Lewis
KELLEY DRYE & WARREN LLP
333 West Wacker Drive, 26th Floor
Chicago, IL 60606
GelBlasterTeam@KelleyDrye.com

William C. Petit
Lana Rowenko
KELLEY DRYE & WARREN LLP
515 Post Oak Blvd., Suite 900
Houston, TX 77027
Phone (713) 355-5000
GelBlasterTeam@KelleyDrye.com

Matthew Chakmakian
KELLEY DRYE & WARREN LLP
One Jefferson Road, 2nd Floor
Parsippany, NJ 07054
Phone: (973) 503-5900
GelBlasterTeam@KelleyDrye.com

David Lindenbaum
KELLEY DRYE & WARREN LLP
Canterbury Green
201 Broad Street
Stamford, CT 06901
Phone: (218) 808-7513
GelBlasterTeam@KelleyDrye.com

By: */s/Louis S. Mastriani*
Louis S. Mastriani
Daniel F. Smith
Sean M. Wesp
AMS TRADE LLP
1133 Connecticut Avenue, NW
Washington, DC 20036
Phone: (202) 467-6300
PTT-001@amstrade.com

Brian A. Comack
Kenneth P. George
Chester Rothstein
Neil M. Zipkin
Matthieu Hausig
AMSTER ROTHSTEIN & EBENSTEIN LLP
90 Park Avenue, 21st Floor
New York, NY 10016
Phone: (212) 336-8098
PTT-ITC@arelaw.com

ATTORNEYS FOR RESPONDENTS PRIME TIME TOYS LTD., PRIME TIME TOYS LLC, & EASEBON SERVICES LTD.

Petitioner Gel Blaster, Inc. - Ex. 1020, 0006

ATTORNEYS FOR RESPONDENTS GEL BLASTER, YU LEE COMPANY LTD., GUANGDONG YU LEE TECHNOLOGY CORPORATION AND SHENZHEN YI JIN ELECTRONICS SCIENCE AND TECHNOLOGY CO., LTD.

By: */s/ Paul F. Brinkman*
Paul F. Brinkman, P.C.
Karthik Ravishankar
KIRKLAND & ELLIS LLP
1301 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Phone: (202) 389-5000
SplatRBall_ITC@kirkland.com

Gianni Cutri, P.C.
Brian A. Verbus
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
Phone: (312) 862-2000
SplatRBall_ITC@kirkland.com

Adam R. Alper, P.C.
KIRKLAND & ELLIS LLP
555 California Street
San Francisco, C.A. 94104
Phone: (415) 439-1400
SplatRBall_ITC@kirkland.com

Michael W. De Vries, P.C.
KIRKLAND & ELLIS LLP
555 South Flower Street, Suite 3700
Los Angeles, C.A. 90071
Phone: (213) 680-8400
SplatRBall_ITC@kirkland.com

Tiffany M. Knapp
KIRKLAND & ELLIS LLP
200 Clarendon Street
Boston, MA 02116
Phone: (617) 385-7500

By: */s/ Todd P. Taylor*
Todd P. Taylor, Esq.
Office of Unfair Import Investigations
U.S. INTERNATIONAL TRADE COMMISSION
500 E Street, S.W., Room 401
Washington, D.C. 20436
Phone: (202) 205-3248
todd.taylor@usitc.gov

Petitioner Gel Blaster, Inc. - Ex. 1020, 0007

SplatRBall_ITC@kirkland.com

Laura Kelly Uhlenhuth
KIRKLAND & ELLIS LLP
60 East South Temple
Salt Lake City, UT 84111
Phone: (801) 877-8100
SplatRBall_ITC@kirkland.com

ATTORNEYS FOR RESPONDENTS SPLAT-R-BALL, LLC, DAISY MANUFACTURING COMPANY AND S-BEAM PRECISION PRODUCTS LTD.

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing document, **POST-HEARING JOINT CLAIM CONSTRUCTION CHART** has been filed and served on November 22, 2022, on the following:

The Honorable Katherine Hiner Secretary to the Commission **U.S. INTERNATIONAL TRADE COMMISSION** 500 E Street, S.W., Room 112-A Washington, D.C. 20436	☐ Via First Class Mail ☐ Via Hand Delivery ☐ Via FedEx ☐ Via Electronic Mail ☒ Via Electronic Filing (EDIS)
The Honorable MaryJoan McNamara Administrative Law Judge **U.S. INTERNATIONAL TRADE COMMISSION** 500 E Street, SW Washington, D.C. 20436 McNamara337@usitc.gov	☐ Via First Class Mail ☐ Via Hand Delivery ☐ Via FedEx ☒ Via Electronic Mail ☒ Via Electronic Filing (EDIS)
Todd P. Taylor, Esq. Office of Unfair Import Investigations **U.S. INTERNATIONAL TRADE COMMISSION** 500 E Street, S.W., Room 401 Washington, D.C. 20436 Phone: (202) 205-3248 todd.taylor@usitc.gov	☐ Via First Class Mail ☐ Via Hand Delivery ☐ Via FedEx ☒ Via Electronic Mail ☒ Via Electronic Filing (EDIS)
Paul C. Rosenthal Scott W. Doyle Elizabeth Johnson Melissa Byroade **KELLEY DRYE & WARREN LLP** Washington Harbour, Suite 400 3050 K Street, NW Washington, DC 20007 Phone: (202) 342-8400 GelBlasterTeam@KelleyDrye.com Steven Yovits Douglas Lewis **KELLEY DRYE & WARREN LLP** 333 West Wacker Drive, 26th Floor	☐ Via First Class Mail ☐ Via Hand Delivery ☐ Via FedEx ☒ Via Electronic Mail ☒ Via Electronic Filing (EDIS)

Petitioner Gel Blaster, Inc. - Ex. 1020, 0009

Chicago, IL 60606 Phone: (312) 857-7070 GelBlasterTeam@KelleyDrye.com William C. Petit Lana Rowenko **KELLEY DRYE & WARREN LLP** 515 Post Oak Blvd., Suite 900 Houston, TX 77027 Phone: (713) 355-5000 GelBlasterTeam@KelleyDrye.com Matthew Chakmakian **KELLEY DRYE & WARREN LLP** One Jefferson Road, 2nd Floor Parsippany, NJ 07054 Phone: (973) 503-5900 GelBlasterTeam@KelleyDrye.com David Lindenbaum **KELLEY DRYE & WARREN LLP** Canterbury Green 201 Broad Street Stamford, CT 06901 Phone: (218) 808-7513 GelBlasterTeam@KelleyDrye.com **ATTORNEYS FOR RESPONDENTS GEL BLASTER, YU LEE COMPANY LTD., GUANGDONG YU LEE TECHNOLOGY CORPORATION AND SHENZHEN YI JIN ELECTRONICS SCIENCE AND TECHNOLOGY CO., LTD.**	
Louis S. Mastriani Daniel F. Smith Sean M. Wesp **AMS TRADE LLP** 1133 Connecticut Avenue, NW Washington, DC 20036 Phone: (202) 467-6300 PTT-001@amstrade.com PTT-ITC@arelaw.com Brian A. Comack Kenneth P. George	☐ Via First Class Mail ☐ Via Hand Delivery ☐ Via FedEx ☒ Via Electronic Mail ☒ Via Electronic Filing (EDIS)

Petitioner Gel Blaster, Inc. - Ex. 1020, 0010

Chester Rothstein Neil M. Zipkin Matthieu Hausig **AMSTER ROTHSTEIN & EBENSTEIN LLP** 90 Park Avenue, 21st Floor New York, NY 10016 Phone: (212) 336-8098 PTT-001@amstrade.com PTT-ITC@arelaw.com **ATTORNEYS FOR RESPONDENTS PRIME TIME TOYS LTD., PRIME TIME TOYS LLC, & EASEBON SERVICES LTD.**	
Paul F. Brinkman, P.C. **KIRKLAND & ELLIS LLP** 1301 Pennsylvania Avenue, N.W. Washington, D.C. 20004 Phone: (202) 389-5000 SplatRBall_ITC@kirkland.com Gianni Cutri, P.C. Brian A. Verbus **KIRKLAND & ELLIS LLP** 300 North LaSalle Chicago, IL 60654 Phone: (312) 862-2000 SplatRBall_ITC@kirkland.com Adam R. Alper, P.C. **KIRKLAND & ELLIS LLP** 555 California Street San Francisco, C.A. 94104 Phone: (415) 439-1400 SplatRBall_ITC@kirkland.com Michael W. De Vries, P.C. **KIRKLAND & ELLIS LLP** 555 South Flower Street, Suite 3700 Los Angeles, C.A. 90071 Phone: (213) 680-8400 SplatRBall_ITC@kirkland.com Tiffany M. Knapp	☐ Via First Class Mail ☐ Via Hand Delivery ☐ Via FedEx ☒ Via Electronic Mail ☒ Via Electronic Filing (EDIS)

Petitioner Gel Blaster, Inc. - Ex. 1020, 0011

KIRKLAND & ELLIS LLP 200 Clarendon Street Boston, MA 02116 Telephone: (617) 385-7500 SplatRBall_ITC@kirkland.com Laura Kelly Uhlenhuth **KIRKLAND & ELLIS LLP** 60 East South Temple Salt Lake City, UT 84111 Phone: (801) 877-8100 SplatRBall_ITC@kirkland.com **ATTORNEYS FOR RESPONDENTS SPLAT-R-BALL, LLC, DAISY MANUFACTURING COMPANY AND S-BEAM PRECISION PRODUCTS LTD.**	
Megan J. Redmond Adam P. Seitz Carrie A. Bader **ERISE IP** 7015 College Blvd., Ste 700 Overland Park, KS 66211 spinmaster_1325@eriseip.com Tyler Knox **ERISE IP** 5299 DTC Blvd., Ste 1340 Greenwood Village, CO 80111 spinmaster_1325@eriseip.com **ATTORNEYS FOR COMPLAINANT SPIN MASTER, INC.**	☐ Via First Class Mail ☐ Via Hand Delivery ☐ Via FedEx ☒ Via Electronic Mail ☒ Via Electronic Filing (EDIS)

/s/ Jeannet T. Santos
Jeannet T. Santos

Petitioner Gel Blaster, Inc. - Ex. 1020, 0012