

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

OLLNOVA TECHNOLOGIES LTD.,

Plaintiff,

v.

EMERSON ELECTRIC CO. and VERDANT
ENVIRONMENTAL TECHNOLOGIES,
INC.,

Defendants.

Case No. 6:22-cv-00358-ADA

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION STATEMENT

I. Undisputed Constructions

#	Term	Agreed Construction
1	“chance” '887 Patent, Claim 1	“change”
2	“a multi-sensor package” '282 Patent, Claims 1, 7, 13, 20	“a single packaged sensor device, not a group of individual sensors”

II. Disputed Constructions

#	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction
3	“information associated reading of the indicator” '887 Patent, Claim 1	“information associated with the reading of the indicator”	<i>Indefinite.</i>

#	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction
4	“identification flag for each identified sensor value” '282 Patent, Claims 4, 10, 16	No construction necessary. ¹ Plain and ordinary meaning. Preamble: “The automation component of claim [3] / [9] / [15]”	<i>Indefinite.</i>
5	“power-down command” '282 Patent, Claim 13	No construction necessary. Plain and ordinary meaning.	“command that turns off a device or returns it to a low-power state”

Dated: December 20, 2022

Respectfully submitted,

By: /s/ Brett Cooper

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Dated: December 20, 2022

Respectfully submitted,

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 James R. Batchelder (Pro Hac Vice)
 (CA Bar No. 136347)
 James L. Davis, Jr. (Pro Hac Vice)

¹ For terms where Ollnova has indicated that no construction is necessary, Ollnova contends that either no construction is necessary or the term should be construed according to its plain and ordinary meaning.

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CERTIFICATE OF SERVICE

I certify that this document is being served upon counsel of record for Defendants on December 20, 2022 via electronic service.

/s/ Brett Cooper
Brett Cooper