IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ROSEN TECHNOLOGIES LLC, *Plaintiff*, **v.** **LENNOX INDUSTRIES, INC.,** *Defendant*.	**Case No. 3:22-cv-00732-K** **JURY TRIAL DEMANDED**

PLAINTIFF'S AMENDED DISCLOSURE OF ASSERTED CLAIMS AND PRELIMINARY INFRINGEMENT CONTENTIONS

Pursuant to the Scheduling Order (Dkt. No. 29) and N.D. Tex. Misc. Order No. 62, Plaintiff Rosen Technologies LLC ("Rosen" or "Plaintiff") serves its Amended Disclosure of Asserted Claims and Preliminary Infringement Contentions with Accompanying Document Production on Defendant Lennox Industries, Inc. ("Lennox" or "Defendant").

I. THE ASSERTED CLAIMS

The table below discloses each claim of each asserted patent that is allegedly infringed by Lennox:

THE ASSERTED PATENTS	THE ASSERTED CLAIMS
U.S. Patent No. 6,619,555	18 and 20
U.S. Patent No. 6,789,739	1, 3, 7, 8, and 9
U.S. Patent No. 7,156,318	1, 3, 4, 5, 7, 9, and 11
U.S. Patent No. 7,185,825	1 and 4
U.S. Patent No. 7,232,075	1, 2, 3, and 4

II. THE ACCUSED INSTRUMENTALITIES

The table below discloses separately for each asserted patent, each accused instrumentality of Lennox by name of which Rosen is aware:

THE ASSERTED PATENTS	THE ACCUSED INSTRUMENTALITIES
U.S. Patent No. 6,619,555	Lennox iComfort Series Thermostats including the S30 Ultra Smart, E30 Smart, M30 Smart, and Wi-Fi Touchscreen models
U.S. Patent No. 6,789,739	Lennox iComfort Series Thermostats including the S30 Ultra Smart, E30 Smart, M30 Smart, and Wi-Fi Touchscreen models
U.S. Patent No. 7,156,318	Lennox iComfort Series Thermostats including the S30 Ultra Smart, E30 Smart, M30 Smart, and Wi-Fi Touchscreen models
U.S. Patent No. 7,185,825	Lennox iComfort Series Thermostats including the S30 Ultra Smart, E30 Smart, M30 Smart, and Wi-Fi Touchscreen models
U.S. Patent No. 7,232,075	Lennox iComfort Series Thermostats including the S30 Ultra Smart, E30 Smart, M30 Smart, and Wi-Fi Touchscreen models

III. THE CLAIM CHARTS

Rosen directs Lennox to the claim charts attached as Exhibits A-E which identify specifically and in detail where each elements of each asserted claim is found within each accused

instrumentality. These charts are based on a preliminary understanding of information currently available to Rosen, and Rosen reserves the right to supplement these charts as discovery proceeds.

IV. LITERAL INFRINGEMENT OR DOCTRINE OF EQUIVALENTS

Rosen claims that each element of each asserted claim is literally present in the accused instrumentalities.

V. EARLIEST EFFECTIVE PRIORITY DATES

The table below discloses the earliest effective priority dates for the asserted patents:

THE ASSERTED PATENTS	EARLIEST EFFECTIVE PRIORITY DATES
U.S. Patent No. 6,619,555	Feb. 13, 2002
U.S. Patent No. 6,789,739	Feb. 13, 2002
U.S. Patent No. 7,156,318	Sept. 3, 2003
U.S. Patent No. 7,185,825	June 24, 2004
U.S. Patent No. 7,232,075	May 15, 2003

IV. DOCUMENT PRODUCTION

Rosen produces the following document production accompanying this disclosure:

DOCUMENT DESCRIPTION	BATES RANGE
File History of U.S. Patent No. 6,619,555	ROSEN 000001-000084
File History of U.S. Patent No. 6,789,739	ROSEN 000085-000177
File History of U.S. Patent No. 7,156,318	ROSEN 000178-000343
File History of U.S. Patent No. 7,185,825	ROSEN 000344-000517
File History of U.S. Patent No. 7,232,075	ROSEN 000518-000613

Documents evidencing conception and reduction to practice of each of claimed invention.	At this time, Rosen does not believe it is in possession of any documents relating to the conception and reduction to practice of each claimed invention. Rosen will perform a reasonable search and produce non-privileged, relevant documents relating to the conception and reduction to practice of each of the claimed inventions.
Documents sufficient to evidence any public use, offer for sale, sale, or other availability to the public of the claimed invention prior to the date of application for the asserted patent.	At this time, Rosen does not believe it is in possession of any documents evidencing any public disclosure of the claimed invention prior to the date of application for the asserted patents. Rosen will perform a reasonable search and produce non-privileged, relevant documents relating to the conception and reduction to practice of each of the claimed inventions.

DATED: November 21, 2022

Respectfully submitted,

By: */s/ Stevenson Moore*

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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of November, 2022, I served copies of the foregoing on all counsel of record for Defendant via electronic mail.

/s/ Stevenson Moore
Stevenson Moore