

**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 PROPOSED CLAIM CONSTRUCTIONS

Plaintiff Rosen Technologies LLC ("Plaintiff"), pursuant to this Court's Scheduling Order (Dkt. No. 29), identifies proposes the following constructions for claim terms in regard to U.S. Patent Nos. 6,619,555 (the "'555 Patent"), 6,789,739 (the "'739 Patent"), 7,156,318 (the "'318 Patent"), 7,185,825 (the "'825 Patent"), and 7,232,075 (the "'075 Patent").

'555 Patent	
Terms:	Claims
means coupling said communications interface and said first remote correspondent '555 Patent, Claim 18	Subject to § 112 ¶6 Structure: serial link and/or data link and any equivalents Function: coupling the communications interface and the remote correspondent
a sensor input coupled to said temperature sensor for receiving said electrical signal therefrom '555 Patent, Claim 18	No Construction Necessary Plain and Ordinary Meaning
a control output coupled to the space conditioning equipment for issuing control signals thereto '555 Patent, Claim 18	No Construction Necessary Plain and Ordinary Meaning

a communications interface adapted to establish bi-directional communications between said processor and a remote correspondent which is a source of current information '555 Patent Claim 18	No Construction Necessary Plain and Ordinary Meaning
a first remote correspondent which is a source of current information '555 Patent, Claim 18	No Construction Necessary Plain and Ordinary Meaning
a program stored in said memory for displaying messages received from said remote correspondent '555 Patent, Claim 18	No Construction Necessary Plain and Ordinary Meaning
which received messages do not pertain to the operation of said thermostat system '555 Patent, Claim 18	No Construction Necessary Plain and Ordinary Meaning

'739 Patent	
Terms:	Claims
storage means '739 Patent, Claim 1	Subject to § 112 ¶6 Structure: memory Function: storing location data
a physical location of the environmental controller stored as location data in storage means in the controller '739 Patent, Claim 1	No Construction Necessary Plain and Ordinary Meaning
transmitter means connected to the controller adapted to transmit location data to a remote device physically remote from the controller so that a location response is induced at the remote device	No Construction Necessary. Plain and Ordinary Meaning

'739 Patent, Claim 1	
physically remote from the controller	No Construction Necessary
'739 Patent, Claim 1	Plain and Ordinary Meaning
location response is storage of the location data at the remote device and correlation of the physical to location response data stored at or available to the remote device or created by processing of location data at the remote device whereafter location response data is transmitted from the remote device to the controller	No Construction Necessary Plain and Ordinary Meaning
'739 Patent, Claim 1	
location response is storage of the location data at the remote device and correlation of the physical to location response data stored at or available to the remote device or created by processing of location data at the remote device	No Construction Necessary Plain and Ordinary Meaning
'739 Patent, Claim 7	

'318 Patent	
Terms:	Claims
is been touched again	"Has been touched again"
'318 Patent, Claim 4	
an input/output unit coupled between said processor and said touch screen for carrying out information transfer therebetween . . ."	No Construction Necessary Plain and Ordinary Meaning
'318 Patent, Claim 1	
a sensor input coupled to each said environmental condition sensors for receiving said electrical signal therefrom	No Construction Necessary Plain and Ordinary Meaning
'318 Patent, Claim 1	

a control output coupled to the space conditioning equipment for issuing control signals thereto '318 Patent, Claim 1	No Construction Necessary Plain and Ordinary Meaning
a control program stored in said memory for causing said central processing unit to communicate through said input/output unit to selectively: 1) establish on said liquid crystal display: a) a representation of a first virtual button at a first predetermined position on the liquid crystal display; and b) a first legend indicative of a first control function of said thermostat, which first control function is for controlling a first space conditioning equipment component, which first control function is active when the first legend is viewable; 2) read the position on the touch pad juxtaposed with said first predetermined position on said liquid crystal display to determine if the representation of said first virtual button has been touched; 3) if the first virtual button has been touched: a) determining that the thermostat has been directed to control a second space conditioning equipment component; b) activating a second control function for controlling the second space conditioning equipment component; and c) displaying on said liquid crystal display a second legend indicative of said second control function of said thermostat, which second control function is for controlling the second space conditioning equipment component, which second control function is active when the second legend is viewable '318 Patent, Claim 1	No Construction Necessary Plain and Ordinary Meaning
the graphic '318 Patent, Claims 5, 7, 9, 11	No Construction Necessary Plain and Ordinary Meaning

'825 Patent	
Terms:	Claims
means coupling suitable power for energizing said thermostat from said space conditioning equipment to said thermostat '825 Patent, Claims 1, 11	Subject to § 112 ¶6 Structure: a (power) line and any equivalents Function: coupling suitable power for energizing said thermostat from said space conditioning equipment to said thermostat
real time clock '825 Patent, Claims 1, 11	No Construction Necessary Plain and Ordinary Meaning
a sensor input coupled to said temperature sensor for receiving said electrical signal therefrom '825 Patent, Claim 1	No Construction Necessary Plain and Ordinary Meaning
a control output coupled to the space conditioning equipment for issuing control signals thereto '825 Patent, Claim 1	No Construction Necessary Plain and Ordinary Meaning

'075 Patent	
Terms:	Claims
means coupling said communications interface and said first remote correspondent '075 Patent, Claim 1	Subject to § 112 ¶6 Structure: serial link and/or data link and any equivalents Function: coupling the communications interface and the first remote correspondent
means for controlling space conditioning equipment '075 Patent, Claim 4	Subject to § 112 ¶6 Structure: virtual buttons operating with control programs including as described in 11:7-13:62 and any equivalents

	Function: controlling space conditioning equipment
a sensor input coupled to said temperature sensor for receiving said electrical signal therefrom '075 Patent, Claim 1	No Construction Necessary Plain and Ordinary Meaning
a control output coupled to the space conditioning equipment for issuing control signals thereto '075 Patent, Claim 1	No Construction Necessary Plain and Ordinary Meaning
functional programming '075 Patent, Claim 1	No Construction Necessary Plain and Ordinary Meaning
a control program stored in said memory for causing said central processing unit to selectively: 1) establish on said liquid crystal display one or more representations of buttons at a separated and predetermined positions; 2) read the position on the touch pad juxtaposed with said predetermined position to determine if said representation of a button has been touched; and 3) if said a representation of a button has been touched, processing this information to establish a condition incorporated into the operation of said thermostat system; 4) establish communications between said processor and a first remote correspondent from which is transferred to said memory one or more modules of functional programming; and 5) operate said transferred functional programming to change or add to representations on the touch screen, where said changes or additions of representation on the touch screen were not available to the control program before their transfer to the memory '075 Patent, Claim 1	No Construction Necessary Plain and Ordinary Meaning
in which said communications interface is coupled to an external modem	No Construction Necessary Plain and Ordinary Meaning

Rosen identifies documents produced herewith as Exhibit A as relevant to the construction of one or more disputed terms.

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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of February, 2023, I served the foregoing on counsel of record for Defendant via electronic mail.

/s/ Hao Ni
Hao Ni