

Exhibit B (595 Case)

I. DISPUTED CLAIM TERMS PROPOSED BY VIZGEN

Term	Claim Terms/Phrases (Terms Identified by Vizgen)	Vizgen's Proposed Construction and Supporting Intrinsic Evidence¹	10x's and Harvard's Proposed Construction and Supporting Intrinsic Evidence
1	"detection reagent" 737 Patent claims 1, 23, 24, 48 051 Patent, claims 1, 26, 80, 85, 89, 90, 96 052 Patent, claim 26 136 Patent, claims 1, 24, 27, and 28	"a molecule comprising a probe conjugated to a nucleic acid label comprising one or more pre-determined subsequences such that each nucleic acid label identifies said probe and its corresponding analyte" <u>Intrinsic Evidence:</u>² <i>E.g.</i>, '737 Patent 4:31-42; 4:60-65; 5:12-15; 6:50-59; 6:60-61; 7:15-34; 7:51-61; 8:17-20; 8:58-9:3; 10:12-62; 11:4-20; 11:30-12:7; 19:49-20:30; 22:29-55; 23:25-40; 24:26-51; 25:42-64; 28:54-61; 29:33-45; 29:52-56; 30:34-37; 30:61-66; 37:15-19; 37:34-51; 38:15-27; 38:44-39:4; 39:48-56; 39:65-40:5; 40:32-39; 41:11-20; 47:33-39; 53:14-25; 71:1-21; 74:46-54; 75:58-	No construction necessary — Plain and ordinary meaning <u>Intrinsic Evidence:</u> 051 Patent at 1:48-2:27, 4:7-6:22, 6:51-7:37, 7:54-9:4, 10:11-23, 10:37-11:29, 11:59-12:7, 14:36-61, 19:48-21:31, 21:35-67, 22:19-25:9, 25:23-26:10, 27:51-60, 28:58-29:11, 29:37-31:35, 35:38-36:23, 37:6-38:53, 39:4-25, 39:31-34, 39:47-54, 40:26-46, 41:1-16, 45:25-31, 46:20-37, 46:50-47:13, 51:66-52:10, 52:17-43, 52:44-55, 53:16-22, 59:41-61, 60:57-62, 62:6-26, 63:31-52, 67:51-67, 68:1-67, 70:16-45, 70:51-59, 70:66-71:2, 71:8-38, 71:53-72:8, 72:11-15, 72:27-29, 72:38-46, 72:58-62, 73:7-58, 73:61-74:2, 74:44-

¹ In addition to exemplary intrinsic record support identified herein, Vizgen intends to rely on the claim language of the patents-at-issue, including the language of the asserted and unasserted claims. For the patents at issue in Case No. 22-cv-00595 (the "595 Case"), Vizgen may rely on any intrinsic evidence that other parties identify in the 595 Case or Case No. 22-cv-00261.

² The '737, '051, '052, and '136 Patents share an identical or substantially identical specification with each other and with unasserted family members and share substantially similar disclosures in the specifications of the '265 Provisional and the European counterparts identified herein (*e.g.*, EP2794928) for purposes of the parties' claim construction disputes. For simplicity, Vizgen cites to the specification of the '737 Patent but reserves the right to rely on similar or corresponding material in the other patents-at-issue, including other patent family members, provisional(s), and European counterparts.

Term	Claim Terms/Phrases (Terms Identified by Vizgen)	Vizgen's Proposed Construction and Supporting Intrinsic Evidence ¹	10x's and Harvard's Proposed Construction and Supporting Intrinsic Evidence
		61; 77:60-67; 80:47-83:10; Figs. 3-7; Figs. 11-15 File History of U.S. Patent No. 10,227,639, including, e.g., Claims (Jun. 18, 2014), Rejection (July 7, 2015), Rejection (Feb. 21, 2018), Claims (Feb. 21, 2018), Interview (June 15, 2018), Claims (July 12, 2018), Notice of Allowability (Oct. 16, 2018). File History of U.S. Patent No. 11,293,054, including, e.g., Claims (Apr. 24, 2019), Rejection (Aug. 3, 2020), Claims (Apr. 28, 2021), Notice of Allowability (July 21, 2021). File History of U.S. Patent No. 11,021,737, including, e.g., Claims (Sept. 10, 2020); Rejection (Oct. 21, 2020); Claims (Jan. 23, 2021), Notice of Allowability (Feb. 17, 2021). File History of U.S. Patent No. 11,293,051, including, e.g., Claims (Apr. 23, 2021), Rejection (July 2, 2021), Claims (Nov. 22, 2021), Notice of Allowability (Jan. 3, 2022). File History of U.S. Patent No. 11,293,052, including, e.g., Claims (Apr. 23, 2021), Claims (June 29, 2021); Rejection (July 16, 2021),	50, 74:65-75:15, 75:29-37, 75:54-59, 77:5-12, 79:31-80:30, Figures 5, 6A-6B, 12, 13. The asserted and unasserted claims of the patents-in-suit.

Term	Claim Terms/Phrases (Terms Identified by Vizgen)	Vizgen's Proposed Construction and Supporting Intrinsic Evidence ¹	10x's and Harvard's Proposed Construction and Supporting Intrinsic Evidence
		Claims (Nov. 22, 2021), Notice of Allowability (Dec. 20, 2021). File History of U.S. Patent No. 11,549,136, including, e.g., Claims (July 2, 2021), Rejection (Jan. 28, 2022), Notice of Allowability (July 19, 2022). File History of EP2794928, including, e.g., Claims (Apr. 3, 2016), Claims (Jul. 26, 2018). File History of EP3425063, including, e.g., Claims (Aug. 12, 2021). PCT/US2012/071398 61/579,265 EP2794928	
2	“using 3D fluorescence imaging to identify said cellular nucleic acid molecules” 767 Patent claim 1	“using 3D fluorescence imaging of amplicons to identify said cellular nucleic acid molecules” <u>Intrinsic Evidence:</u> <i>E.g.</i>, '767 Patent 1:26-31; 2:7-49; 3:11-20; 6:9-57; 8:32-9:9; 10:60-11:3; Examples I-III, VII-X, Fig. 2, Fig. 4A, Fig. 4B, Fig. 4C, Fig. 5A. File History of U.S. Patent No. 11,299,767, including, <i>e.g.</i>, Rejection (Aug. 16, 2021).	No construction necessary — Plain and ordinary meaning <u>Intrinsic Evidence:</u> 767 Patent at Abstract, 1:35-47, 1:51-56, 1:56-60, 1:62-66, 1:66-2:6, 2:7-19, 2:23-34, 2:50-63, 2:50-57, 3:4-15, 3:21-24, 3:25-31, 3:56-59, 4:34-37, 4:37-39, 4:39-47, 4:48-5:3, 5:4-6, 5:45-60, 6:9-32, 7:6-31, 8:14-15, 10:4-48, 10:49-59, 12:17-21, Figure 1.

Term	Claim Terms/Phrases (Terms Identified by Vizgen)	Vizgen's Proposed Construction and Supporting Intrinsic Evidence ¹	10x's and Harvard's Proposed Construction and Supporting Intrinsic Evidence
		File History of U.S. Patent No. 10,138,509 including, <i>e.g.</i>, Claims (Sept. 10, 2015), Rejection (Dec. 4, 2017), Remarks (Jan. 26, 2018); Claims (Jan. 26, 2018), Notice of Allowability (Mar. 18, 2018). File History of U.S. Patent No. 11,078,520, including, <i>e.g.</i>, Notice of Allowability (Mar. 24, 2021). File History of EP2971184, including, <i>e.g.</i>, Claims (Feb. 8, 2018). File History of EP3371329, including, <i>e.g.</i>, Claims (Dec. 10, 2019). File History of EP3578666, including, <i>e.g.</i>, Claims (Oct. 29, 2021). PCT/US2014/018580 61/777,383	767 Patent File History at June 30, 2021 Claims (10XH-00004271-04272); August 16, 2021 Non-Final Rejection (10XH-00004301-04313); November 16, 2021 Claims (10XH-00004425-04427); December 7, 2021 Notice of Allowance (10XH-00004449-04457) The asserted and unasserted claims of the patents-in-suit and the claims of U.S. Patent Nos. 10,138,509; 11,078,520; 10,494,662

II. DISPUTED CLAIM TERMS PROPOSED BY 10X

Term	Claim Terms/Phrases (Terms Identified by 10x)	Vizgen's Proposed Construction and Supporting Intrinsic Evidence ³	10x's Proposed Construction and Supporting Intrinsic Evidence
3	“matching the codewords with valid codewords in a codebook by comparing the codewords to the valid codewords in the codebook” 303 Patent, claim 1	Plain and ordinary meaning <u>Intrinsic Evidence:</u> Claims 1, 8-12 '303 Patent at Abstract, 2:4-13, 2:25-36, 3:9-42, 3:50-59, 4:3-62, 5:14-17, 7:48-13:8, 19:62-21:48, 21:63-22:17, 29:64-30:35, 33:62-34:5, Examples 1-10, and all Figures cited and/or described therein. File History of U.S. Patent No. 11,098,303, including Claims and Remarks (Jan. 22, 2021); Claims and Remarks (Mar. 26, 2021); Notice of Allowability (May 26, 2021). PCT/US2015/042556 62/031,062 62/142,653 62/050,636	“determining that each bit of a produced codeword is the same as each bit in the corresponding position of a valid codeword in the codebook” <u>Intrinsic Evidence:</u> 303 Patent at 4:23-47, 10:41-56, 11:20-23, 12:19-44, 20:4-17, 21:17-29, 21:63-22:10, 35:32-48, 36:40-62, 42:37-46, 44:37-56, 46:15-36, 47:21-48:3, 49:48-64, 64:45-51, 65:36-68:63, and all figures and examples cited therein, Claims 9, 10, 12, Figs. 3A-3B, 5E, 6A-6E, 11, 12A-12C, 16A-16E, 19B. 303 Patent File History, including: October 18, 2019 Examiner's rejection (VIZ00002229-240), April 17, 2020 Responses to Examiner's Rejection and Amendments (VIZ00002518-527), October 22, 2020 Examiner's Rejection (VIZ00002528-539), January 22, 2021 Responses to Examiner's Rejection and Amendments (VIZ00002546-2562), May 26, 2021 Examiner's amendment and notice of allowance (VIZ00002851-863).

³ Vizgen reserves the right to rely on the citations to intrinsic evidence cited by 10x. Vizgen further intends to rely on the claim language itself of the '303 Patent.

Term	Claim Terms/Phrases (Terms Identified by 10x)	Vizgen's Proposed Construction and Supporting Intrinsic Evidence ³	10x's Proposed Construction and Supporting Intrinsic Evidence
			PCT/US2015/042556 62/031,062 62/142,653 62/050,636 10x reserves the right to rely on the citations to intrinsic evidence cited by Vizgen. 10x further intends to rely on the claim language itself of the 303 Patent.
4	“if one of the codewords is not matched with one of the valid codewords in the codebook, applying an error detection or correction system, matching the one of the codewords with another of the valid codewords in the codebook, or discarding the one of the codewords” 303 Patent, claim 1	Plain and ordinary meaning <u>Intrinsic Evidence:</u> Claims 1, 8-12 '303 Patent at Abstract, 2:4-13, 2:25-36, 3:9-42, 3:50-59, 4:3-62, 5:14-17, 7:48-13:8, 19:62-21:48, 21:63-22:17, 29:64-30:35, 33:62-34:5, Examples 1-10, and all Figures cited and/or described therein. File History of U.S. Patent No. 11,098,303, including Claims and Remarks (Jan. 22, 2021); Claims and Remarks (Mar. 26, 2021); Notice of Allowability (May 26, 2021). PCT/US2015/042556 62/031,062 62/142,653	The embodying system must be capable of performing the following conditional steps: “if each bit in a produced codeword does not correspond with the bit in the same location of a valid codeword, applying an error detection or correction system [as construed] and either assigning the corrected codeword to another valid codeword or discarding the codeword.” <u>Intrinsic Evidence:</u> 303 Patent at 11:12-28, 12:45-55, 20:6-13, 20:33-35, 20:48-21:34, 38:4-17, 42:37-46, 43:65-44:3, 44:37-59, 46:15-36, 47:21-48:3, 56:39-57, 57:3-8, 65:36-54; 65:36-68:63, and all figures and examples cited therein 303 Patent File History, including:

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		62/050,636	7/29/2019 Amendment after non-final rejection (VIZ00002019-2030), 4/17/2020 Amendment after final rejection (VIZ00002518-527), 1/22/2021 Amendment after non-final rejection (VIZ00002546-562), 5/26/2021 Examiner's amendment and notice of allowance (VIZ00002851-863). PCT/US2015/042556 62/031,062 62/142,653 62/050,636 10x reserves the right to rely on the citations to intrinsic evidence cited by Vizgen. 10x further intends to rely on the claim language itself of the 303 Patent.
5	“an error detection or correction system” 303 Patent, claim 1	This claim limitation is not governed by 35 U.S.C. ¶ 112(f). No construction necessary. <u>Intrinsic Evidence:</u> Claims 1, 8-12 '303 Patent at Abstract, 2:4-13, 2:25-36, 3:9-42, 3:50-59, 4:3-62, 5:14-17, 7:48-13:8, 19:62-21:48, 21:63-22:17, 29:64-30:35, 33:62-34:5, Examples 1-10, and all Figures cited and/or described therein.	This limitation is governed by 35 U.S.C. ¶ 112 (f). Function: detecting or correcting unmatched bits in a produced codeword Structure: “A Hamming system, a Golay code, or an extended Hamming system (or a SECDED system, i.e., single error correction, double error detection)” as disclosed in Col. 11:12-28, Col. 20:51-21:34, Col. 38:4-17, Col. 65:36-68:63.

Term	Claim Terms/Phrases (Terms Identified by 10x)	Vizgen's Proposed Construction and Supporting Intrinsic Evidence ³	10x's Proposed Construction and Supporting Intrinsic Evidence
		File History of U.S. Patent No. 11,098,303, including Claims and Remarks (Jan. 22, 2021); Claims and Remarks (Mar. 26, 2021); Notice of Allowability (May 26, 2021).; PCT/US2015/042556 62/031,062 62/142,653 62/050,636	<u>Intrinsic Evidence:</u> 303 Patent at 11:12-28, 12:45-55, 20:6-24, 20:51-21:34, 30:13-20, 34:63-35:18, 36:54-62, 38:4-17, 42:37-46, 44:37-59, 46:15-36, 47:21-48:3, 53:54-54:65, 65:36-68:63, and all figures and examples cited therein, Figs. 12A-12C. PCT/US2015/042556 62/031,062 62/142,653 62/050,636 303 Patent File History 10x reserves the right to rely on the citations to intrinsic evidence cited by Vizgen. 10x further intends to rely on the claim language itself of the 303 Patent.