

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

C&M OILFIELD RENTALS, LLC  
D/B/A C-MORE ENERGY SERVICES  
*Plaintiff,*

vs.

ENSIGN US SOUTHERN DRILLING LLC,  
*Defendant.*

Civil Action No. 4:22-cv-00965

**JURY TRIAL DEMANDED**

**JOINT CLAIM CONSTRUCTION CHART**

Pursuant to Patent Rule 4-5(b)-(c) and the Court's Patent Scheduling Order (Dkt. 35), Plaintiff C&M Oilfield Rentals, LLC d/b/a C-MOR Energy Services ("Plaintiff" or "C&M") and Defendant Ensign US Southern Drilling LLC ("Defendant" or "Ensign") hereby provide the Joint Claim Construction Chart for U.S. Patent Nos. 10,976,016 and 10,900,626.

**I. Patent Rule 4-5(b)(1): Each Disputed Claim with Disputed Terms in Bold Type****a. 10,976,016 Patent**

| <b>Claim</b> | <b>Claim Language With Disputed Terms in Bold Type</b>                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1            | 1. A modular lighting system mounted on a rig, the modular lighting system comprising:<br>a plurality of light units, each light unit separately attached to a crown deck of the rig, and each light unit comprising:<br>a <b>mounting pole</b> ;<br>a light fixture comprising one or more lights; and<br>a bracket configured to attach the <b>mounting pole</b> to the crown deck of the rig.                                                                                         |
| 2            | 2. The lighting system of claim 1, wherein the bracket is connected to the crown deck of the rig using bolts.                                                                                                                                                                                                                                                                                                                                                                            |
| 23           | 23. A rig comprising:<br>a derrick;<br>a crown deck at the top of the derrick; and<br>a plurality of light units, each light unit separately attached to the crown deck, each light unit comprising:<br>a <b>mounting pole</b> , wherein each light unit comprises a separate <b>mounting pole</b> , such that the system comprises a plurality of <b>mounting poles</b> ; and<br>a light fixture comprising one or more lights, the light fixture coupled to the <b>mounting pole</b> . |

**b. 10,900,626 Patent**

| <b>Claim</b> | <b>Claim Language With Disputed Terms in Bold Type</b>                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9            | 9. A rig comprising:<br>a derrick;<br>a crown deck at the top of the derrick, the crown deck comprising a handrail; and<br>a plurality of light units attached to the handrail, each light unit comprising:<br>a <b>mounting pole</b> , wherein each light unit comprises a separate <b>mounting pole</b> , such that the system comprises a plurality of <b>mounting poles</b> ; and<br>a light fixture comprising one or more lights, the light fixture coupled to the <b>mounting pole</b> . |
| 19           | 19. A method for illuminating a wellsite, comprising:                                                                                                                                                                                                                                                                                                                                                                                                                                           |

|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|--|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <p>mounting a plurality of <b>mounting poles</b> on a crown deck of a rig, wherein each of the plurality of <b>mounting poles</b> is attached to a handrail of the crown deck;</p> <p>mounting a plurality of lights to the plurality of <b>mounting poles</b>, wherein each of the plurality of <b>mounting poles</b> supports at least one of the plurality of lights, and each of the plurality of lights is mounted to only one of the plurality of <b>mounting poles</b>; and</p> <p>illuminating the wellsite using the plurality of lights.</p> |
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**II. Patent Rule 4-5(b)(2)-(4): Proposed Constructions for Disputed Terms**

|   | <b><u>Claim Term</u></b> | <b><u>Claim(s)</u></b>                                      | <b><u>Plaintiff's Proposed Construction</u></b>                                                                                                       | <b><u>Defendant's Proposed Construction</u></b>                                                                                                                                                                                    | <b><u>Court's Construction</u></b> |
|---|--------------------------|-------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|
| 1 | <b>mounting pole</b>     | '016 Patent claims 1 and 23;<br>'626 Patent claims 9 and 19 | Plain and ordinary meaning, which is: "elongated structure fixed at one end and for mounting where the length of the structure far exceeds the width" | A "mounting pole" is a pole used for mounting something. Both "mounting" and "pole" have their plain and ordinary meanings. A pole can be cut shorter and still remain a pole, even if its length no longer far exceeds the width. |                                    |

**III. Patent Rule 4-5(c): Agreed Claim Terms**

|   | <b><u>Claim Term</u></b> | <b><u>Patent Claim(s)</u></b>                                   | <b><u>Construction</u></b> | <b><u>Court's Construction</u></b>                                                                                                             |
|---|--------------------------|-----------------------------------------------------------------|----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | <b>crown deck</b>        | '016 Patent claims 1, 2, and 23;<br>'626 Patent claims 9 and 19 | <b>[AGREED]</b>            | a collection of structures within the crown that includes a walking surface, parts supporting the walking surface, and any associated handrail |
| 2 | <b>bracket</b>           | '016 Patent claims 1 and 2                                      | <b>[AGREED]</b>            | Plain and ordinary meaning, which is a component or components connecting one part to another or holding a part.                               |
| 3 | <b>attached</b>          | '016 Patent claims 1 and 23;<br>'626 Patent claims 9 and 19     | <b>[AGREED]</b>            | Plain and ordinary meaning, which includes direct and indirect attachment, connection, and coupling.                                           |
| 4 | <b>connected</b>         | '016 Patent claim 2                                             | <b>[AGREED]</b>            | Plain and ordinary meaning, which includes direct and indirect attachment, connection, and coupling.                                           |
| 5 | <b>coupled</b>           | '016 Patent claim 23;<br>'626 Patent claim 9                    | <b>[AGREED]</b>            | Plain and ordinary meaning, which includes direct and indirect attachment, connection, and coupling.                                           |
| 6 | <b>mounted</b>           | '016 Patent claim 1;<br>'626 Patent claim 19                    | <b>[AGREED]</b>            | Plain and ordinary meaning                                                                                                                     |
| 7 | <b>handrail</b>          | '626 Patent claims 9 and 19                                     | <b>[AGREED]</b>            | Plain and ordinary meaning                                                                                                                     |
| 8 | <b>bolts</b>             | '016 Patent claim 2                                             | <b>[AGREED]</b>            | Plain and ordinary meaning                                                                                                                     |

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**CERTIFICATE OF SERVICE**

I certify that on August 14, 2023, a true and correct copy of the foregoing was served upon counsel for all parties via electronic mail.

/s/ Elizabeth M. Chiaviello

Elizabeth M. Chiaviello