

APPENDIX A

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JOINT DISPUTED CLAIM TERMS CHART

**Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.
 (“Ferno”), Civ. Action No. 1:22-cv-00588**

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
Stryker’s U.S. Patent No. 7,398,571						
1. (a) “a rapid movement of said deployment mechanism” (b) “rapidly drawn toward” U.S. Patent No. 7,398,571 Claim 2	Stryker believes that the terms “a rapid movement of said deployment mechanism” and “rapidly drawn toward” are definite. The claims, viewed in light of the specification and prosecution history, inform those of skill in the art about the scope of the invention with reasonable certainty. Stryker does not think the terms “a rapid movement of said deployment mechanism” and “rapidly drawn toward” require construction. The plain and ordinary meaning should be applied. Furthermore, Ferno’s identification of the claim terms and their proposed constructions have been made in a vacuum and without consideration for the context of the entire claim. Ferno improperly incorporates limitations from the specification into the claims. To the extent the Court requires construction,	571 Patent, including, but not limited to: Figures 1-5, 7, 60, 61; Abstract, Col. 1, Ln. 55-61; Col. 11, Ln. 15-21, Col. 20, Ln. 20-34, Col. 21, Ln. 7-9; Claim 2. 571 Patent’s Re-exam Prosecution History, including, but not limited to: Decision on Appeal, <i>Monster Medic, Inc. v. Stryker Corp.</i>, Board of Patent Appeals and Interferences, Appeal No. 2011-012124; Respondent’s Brief Dated March 1, 2011; Patent Owner’s (Appellant’s) Appeal Brief dated February 1, 2011. Stryker reserves the right to rely on Ferno’s intrinsic evidence.	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi that: (i) the terms “a rapid movement of said deployment mechanism,” and “rapidly drawn toward” are not indefinite because the claims, viewed in light of the specification and prosecution history, inform those skilled in the art about the scope of the invention with reasonable certainty; and (ii) regarding the meaning of the terms “a rapid movement of said deployment mechanism,” and “rapidly drawn toward” how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the terms based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and that a POSA would have understood the claim term “a rapid movement of said deployment mechanism” to have the meaning of “a rate of movement of said deployment mechanism that is faster relative to another rate of movement of said deployment mechanism,” and the term “rapidly drawn toward” to have the meaning of “drawn toward at the rate of movement that is faster relative to another rate of movement.”	This phrase is not capable of being construed because the word “rapid” is indefinite. In the alternative, “[r]apid movement of said deployment mechanism” and “rapidly drawn toward” mean a speed greater than or equal to the speed at which the cot collapses due to gravity when there is a loss of hydraulic pressure in the actuator.	A. ‘571 Patent, including, but not limited to: FIGS. 1-5 and 7; col. 11, ll. 6-21; col. 19, ll. 40-51; col. 20, ll. 36-39; and Claim 2. B. ‘571 Patent Reexamination Prosecution History including, but not limited to: Decision on Appeal, <i>Monster Medic, Inc. v. Stryker Corp.</i>, Board of Patent Appeals and Interferences, Appeal No. 2011-012124.	Actuate: to put into mechanical action or motion. <i>Actuate</i>, Definition, MERRIAM-WEBSTER’ COLLEGIATE DICTIONARY (11TH ED. 2003), available at https://www.merriam-webster.com/dictionary/actuate (last visited July 11, 2023). Hydraulic: operated by the resistance offered or the pressure transmitted when a quantity of liquid (such as water or oil) is forced through a comparatively small orifice or through a tube. Hydraulic, Definition, MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003), available at https://www.merriam-webster.com/dictionary/hydraulic (last visited July 11, 2023). Pressure: the action of a force against an opposing force. Pressure, Definition, MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003), available at https://www.merriam-webster.com/dictionary/pressure (last visited July 11, 2023).

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Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
	Stryker proposes the following constructions: (a) “A rate of movement of said deployment mechanism that is faster relative to another rate of movement of said deployment mechanism.” (b) “Drawn toward at the rate of movement that is faster relative to another rate of movement.”		Stryker reserves the right to rely on Ferno’s extrinsic evidence. Rapid: marked by a fast rate of motion, activity, succession, or occurrence. <i>Rapid, Definition</i>, MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003 at Page 1030), available at https://www.merriam-webster.com/dictionary/rapid (last visited August 9, 2023), Exhibit B. Rapid: very fast: SWIFT. <i>Rapid, Definition</i>, THE MERRIAM-WEBSTER DICTIONARY (New Edition 2005 at Page 410), Exhibit C. Rapid: quick, swift. <i>Rapid, Definition</i>, COLLINS ENGLISH DICTIONARY (First Edition 2005 at Page 479), Exhibit D. <i>Ferno Users’ Manual</i> for the iNX Integrated Patient Transport and Loading System (April 2022, Pub. No. 234-3622-08) (Bates Nos. FERNO0005286 to FERNO0005296).			

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Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
2. (a) “control mechanism on said cot configured to facilitate said movement of said base frame and said litter frame toward each other and at differing speeds predicated on at least one of whether said base frame is supported on said surface and said litter frame is supported by an external support separate from said elevating mechanism” U.S. Patent No. 7,398,571 Claim 5 (b) “control mechanism is configured such that when said base frame is	Stryker does not think these terms require construction and that the plain and ordinary meaning should be applied. Furthermore, Ferno’s identification of the claim terms and their proposed constructions have been made in a vacuum and without consideration for the context of the entire claim. Additionally, Ferno improperly incorporates limitations from the specification into the claims. To the extent the Court requires construction, Stryker proposes the following: (a) “A system that: 1) detects whether the base is supported by the ground and/or the litter frame is supported by an external support separate from the elevating mechanism, and 2) controls movement of the base frame toward the litter frame at one speed when the base is	571 Patent, including, without limitation: Figures 17-25; Abstract, Col. 1, Ln. 55-60, Col. 20, Ln. 14-Col. 21, Ln. 56; Claims 5-10. 571 Patent’s Re-exam Prosecution history, including, but not limited to: Decision on Appeal, <i>Monster Medic, Inc. v. Stryker Corp.</i>, Board of Patent Appeals and Interferences, Appeal No. 2011-012124; Respondent’s Brief Dated March 1, 2011; Patent Owner’s (Appellant’s) Appeal Brief dated February 1, 2011; Response to Office Action dated September 14, 2010; Action Closing Prosecution, August 14, 2010; Response to Office Action dated June 15, 2010. Stryker reserves the right to rely on Ferno’s intrinsic evidence.	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the definiteness and meaning of the term “control mechanism on said cot configured to facilitate said movement of said base frame and said litter frame toward each other and at differing speeds predicated on at least one of whether said base frame is supported on said surface and said litter frame is supported by an external support separate from said elevating mechanism,” how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the term based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and that a POSA would have understood the claim term to have the meaning of “a system that: 1) detects whether the base is supported by the ground and/or the litter frame is supported by an external support separate from the elevating mechanism, and 2) controls movement of the base frame toward the litter frame at one speed when the base is supported by the ground and a different speed when the litter frame is supported by the external support.” /	(a) A control mechanism is a micro-processor programmed to: 1) detect whether the base is supported by the ground and/or the litter frame is supported by an external support separate from the elevating mechanism by monitoring pressure by a pressure switch, and 2) produce a control signal to control movement of the base frame toward the litter frame at a different speed when the base is supported by the ground as compared to a speed when the litter frame is supported by the external support. (b) A control mechanism is a microprocessor that provides a first signal to the elevating mechanism to control the elevating mechanism to move the litter frame toward the base frame at a first speed when the microprocessor receives feedback from a pressure switch indicating that the base frame is on the ground, wherein the	A. ‘571 Patent, including, but not limited to: FIGS. 24-25; col. 1, ll. 55-61; col. 6, ll. 36-45; col. 9, ll. 11-18; col. 9, ll. 42-52; col. 10, ll. 3-26; and Claims 5-8; B. ‘571 Patent’s Prosecution history, including, but not limited to: Response to Office Action dated January 25, 2008; C. ‘571 Patent’s Reexamination Prosecution history, including, but not limited to Patent Owner’s (Appellant’s) Appeal Brief dated February 1, 2011; Action Closing Prosecution dated August 14, 2010; Response to Office Action dated September 14, 2010; Response to Office Action dated June 15, 2010.	See <i>Frame, Definition</i>, MICROSOFT ENCARTA COLLEGE DICTIONARY, <i>supra</i>; <i>Frame, Definition</i>, AMERICAN HERITAGE COLLEGE DICTIONARY, <i>supra</i>; <i>Pressure, Definition</i>, MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY, <i>supra</i>. Support: to hold up or serve as a foundation or prop for. <i>Support, Definition</i>, MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003), available at https://www.merriam-webster.com/dictionary/support (last visited July 11, 2023). External: situated outside, apart, or beyond. <i>External, Definition</i>, MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003), available at https://www.merriam-webster.com/dictionary/external (last visited July 11, 2023). Detect: to discover or determine the existence, presence, or fact of. <i>Detect, Definition</i>, MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003), available at https://www.merriam-webster.com/dictionary/detect (last visited July 11, 2023).

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(“Ferno”), Civ. Action No. 1:22-cv-00588

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
supported on said surface, said control mechanism controls said elevating mechanism to move said litter frame toward said base frame at a first speed” U.S. Patent No. 7,398,571 Claim 8 (c) “control mechanism is additionally configured such that when said litter frame is supported by the external support separate from said elevating mechanism, said control mechanism controls said elevating mechanism to move said base frame toward said litter frame	<i>supported by the ground and a different speed when the litter frame is supported by the external support.”</i> <i>(b) “A system that controls the elevating mechanism to move the litter frame toward the base frame at a first speed when the base frame is supported by the ground.”</i> <i>(c) “A system that controls the elevating mechanism to move the litter frame toward the base frame at a second speed when the litter frame is not supported by the elevating mechanism.”</i>		Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the definiteness and meaning of the term “control mechanism is configured such that when said base frame is supported on said surface, said control mechanism controls said elevating mechanism to move said litter frame toward said base frame at a first speed,” how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the term based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and that a POSA would have understood the claim term to have the meaning of “a system that controls the elevating mechanism to move the litter frame toward the base frame at a first speed when the base frame is supported by the ground.” Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the definiteness and meaning of the term “control mechanism is additionally configured such that when said litter frame is supported by the external support separate from said elevating mechanism, said control mechanism controls said elevating mechanism to move said base frame toward said litter	<i>first speed is different from a second speed.</i> (c) A control mechanism is a microprocessor that provides a second signal to the elevating mechanism to control the elevating mechanism to move the litter frame toward the base frame at a second speed when the control mechanism receives feedback from a pressure switch indicating that the litter frame is supported by an external support, wherein the second speed is different from a first speed.		

APPENDIX A**JOINT DISPUTED CLAIM TERMS CHART****Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.****(“Ferno”), Civ. Action No. 1:22-cv-00588**

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
at a second speed” U.S. Patent No. 7,398,571 Claim 8			frame at a second speed,” how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the term based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and that a POSA would have understood the claim term to have the meaning of “a system that controls the elevating mechanism to move the litter frame toward the base frame at a second speed when the litter frame is not supported by the elevating mechanism.” Stryker reserves the right to rely on Ferno’s extrinsic evidence. Stipulated Consent Judgment in Monster Medic Litigation, <i>Case No. 109-cv-1142 RHB</i> at PageID Nos. 637, 640, 645; produced at: STRFERNO00091960, STRFERNO00091963, STRFERNO00091971. Frame: an arrangement of structural parts that gives form or support. <i>Frame, Definition</i>, THE MERRIAM-WEBSTER DICTIONARY (New Edition 2005 at Page 197), Exhibit C.			

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			Frame: Structure giving shape or support. <i>Frame, Definition</i>, COLLINS ENGLISH DICTIONARY (First Edition 2005 at Page 235), Exhibit D. Frame: A structure that gives shape or support. <i>Frame, Definition</i>, AMERICAN HERITAGE COLLEGE DICTIONARY (3D ED. 1993 at Page 540), <i>available at</i> https://ahdictionary.com/word/search.html?q=frame (last visited August 9, 2023), <i>See</i> Bates No. FERNO0037481. Speed: rate of motion; the magnitude of a velocity irrespective of direction; the act or state of moving swiftly. <i>Speed, Definition</i>, MERRIAM-WEBSTER'S COLLEGIATE DICTIONARY (11TH ED. 2003 at Page 1199), <i>available at</i> https://www.merriam-webster.com/dictionary/rapid (last visited August 9, 2023), Exhibit B. Speed: rate of motion or performance. <i>Speed, Definition</i>, THE MERRIAM-WEBSTER DICTIONARY (New Edition 2005 at Page 474), Exhibit C. Speed: swiftness; rate at which something moves or acts <i>Speed, Definition</i>, COLLINS ENGLISH DICTIONARY (First			

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			Edition 2005 at Page 555), Exhibit D. Support: to hold up or serve as a foundation or prop for. <i>Support, Definition</i>, MERRIAM-WEBSTER'S COLLEGIATE DICTIONARY (11TH ED. 2003 at Page 1256), <i>available at</i> https://www.merriam-webster.com/dictionary/supported (last visited August 9, 2023), <i>See</i> Bates No. FERNO0035722. Support: to hold up or serve as a foundation for. <i>Support, Definition</i>, THE MERRIAM-WEBSTER DICTIONARY (New Edition 2005 at Page 494), Exhibit C. Support: bear the weight of. <i>Support, Definition</i>, COLLINS ENGLISH DICTIONARY (First Edition 2005 at Page 580), Exhibit D. External: situated outside, apart, or beyond. <i>External, Definition</i>, MERRIAM-WEBSTER'S COLLEGIATE DICTIONARY (11TH ED. 2003 at Page 443), <i>available at</i> https://www.merriam-webster.com/dictionary/external (last visited August 9, 2023), <i>See</i> Bates No. FERNO0037505. External: of, situated on, or coming from the outside. <i>External</i>,			

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			<i>Definition</i>, COLLINS ENGLISH DICTIONARY (First Edition 2005 at Page 207), Exhibit D. <i>Ferno Users’ Manual</i> for the iNX Integrated Patient Transport and Loading System (April 2022, Pub. No. 234-3622-08) (Bates Nos. FERNO0005286 to FERNO0005296).			

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3. “detection device”/ “detection device detecting an absence of said force”/ “detection device to detect an absence of said force” U.S. Patent No. 7,398,571 Claim 2	Stryker does not think this term requires construction and that the plain and ordinary meaning should be applied. Furthermore, Ferno’s identification of the claim term and its proposed construction have been made in a vacuum and without consideration for the context of the entire claim. Additionally, Ferno improperly incorporates limitations from the specification into the claims. To the extent the Court requires construction, Stryker proposes the following: <i>“A device that detects whether the cot is supported via the base frame or something other than the base frame.”</i>	571 Patent, including, but not limited to: Figures 2, 10-11, 18-21, 24-25, 59-61; Col. 14, Ln. 57-60 (in Table 2); Col. 20, Ln. 43-60; Claims 1-4. 571 Patent’s Re-exam Prosecution History, including, but not limited to: Decision on Appeal, <i>Monster Medic, Inc. v. Stryker Corp.</i> , Board of Patent Appeals and Interferences, Appeal No. 2011-012124; Respondent’s Brief Dated March 1, 2011; Patent Owner’s (Appellant’s) Appeal Brief dated February 1, 2011; Response to Office Action dated September 14, 2010; and Response to Office Action dated June 15, 2010. Stryker reserves the right to rely on Ferno’s intrinsic evidence.	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the definiteness and meaning of the terms “detection device,” “detection device detecting an absence of said force,” and “detection device to detect an absence of said force,” how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the terms based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and that a POSA would have understood the claim terms “detection device,” “detection device detecting an absence of said force,” and “detection device to detect an absence of said force,” to have the meaning of “a device that detects whether the cot is supported via the base frame or something other than the base frame.” Stryker reserves the right to rely on Ferno’s extrinsic evidence. Detect: to discover or determine the existence, presence, or fact of. <i>Detect, Definition</i> , MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003 at Page 340), <i>available at</i>	Ferno contends that this term is governed by 35 U.S.C. § 112, paragraph 6 (pre-AIA): A detection device is a pressure switch within a hydraulic circuit that detects an absence of a force by way of reduced pressure caused by a lifting of the litter frame.	A. ‘571 Patent, including, but not limited to: FIGS. 2, 10-11, 18-21, 24-25, 60; col. 20, ll. 53-60; and Claims 2, 3 and 4. B. ‘968 Patent, including, but not limited to: col. 20, l. 60 – col. 21, l. 1. C. ‘950 Patent, including, but not limited to: col. 20, ll. 30-38; and ‘884. Reexam Patent, col. 20, ll. 37-44. D. ‘571 Patent’s Reexam Prosecution history, including, but not limited to: Decision on Appeal, <i>Monster Medic, Inc. v. Stryker Corp.</i> , Board of Patent Appeals and Interferences, Appeal No. 2011-012124.	None.

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			https://www.merriam-webster.com/dictionary/detect (last visited August 9, 2023), See Bates No. FERNO0037502. Detect: to discover the nature, existence, presence, or fact of. <i>Detect, Definition</i>, THE MERRIAM-WEBSTER DICTIONARY (New Edition 2005 at Page 134), Exhibit C. Detect: notice; discover, find. <i>Detect, Definition</i>, COLLINS ENGLISH DICTIONARY (First Edition 2005 at Page 156), Exhibit D. Device: a piece of equipment or a mechanism for a special purpose. <i>Device, Definition</i>, THE MERRIAM-WEBSTER DICTIONARY (New Edition 2005 at Page 135), Exhibit C. Device: Machine or tool used for a specific task... <i>Device, Definition</i>, COLLINS ENGLISH DICTIONARY (First Edition 2005 at Page 157), Exhibit D. Device: a piece of equipment or a mechanism designed to serve a special purpose or perform a special function. <i>Device, Definition</i>,			

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			MERRIAM-WEBSTER'S COLLEGIATE DICTIONARY (11TH ED. 2003 at Page 342), <i>available at</i> https://www.merriam-webster.com/dictionary/device (last visited August 9, 2023), Exhibit B. <i>Ferno Users' Manual</i> for the iNX Integrated Patient Transport and Loading System (April 2022, Pub. No. 234-3622-08) (Bates Nos. FERNO0005286 to FERNO0005296).			

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Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
4. “elevating mechanism interconnecting said base frame and said litter frame and being configured to effect changes in elevation of said litter frame relative to said base frame, said elevating mechanism being configured to detect a presence and an absence of a force urging a change in elevation” U.S. Patent No. 7,398,571 Claim 1	Stryker does not think this term requires construction and that the plain and ordinary meaning should be applied. Furthermore, Ferno’s identification of the claim term and its proposed construction have been made in a vacuum and without consideration for the context of the entire claim. Additionally, Ferno improperly incorporates limitations from the specification into the claims. To the extent the Court requires construction, Stryker maintains that the entire phrase need not be construed and proposes the following construction for just the term “ elevating mechanism ”: “A mechanism that moves the base frame and the litter frame relative to one another.”	571 Patent, including, but not limited to: Figures 15-25; Abstract, Col. 1, Ln. 49-61, Col. 4, Ln. 19-23, Col. 5, Ln. 66-67, Col. 6, Ln. 3, Col. 8, Ln. 36-37, Col. 11, Ln. 21, Col. 20, Ln. 53-60, Col. 21, Ln. 36-48; Claims 1 and 5-8. 571 Patent’s Re-exam Prosecution History, including, but not limited to: Notice of Intent to Issue <i>Inter Partes</i> Reexamination Certificate dated August 5, 2012; Respondent’s Brief Dated March 1, 2011; Patent Owner’s (Appellant’s) Appeal Brief dated February 1, 2011; Response to Office Action dated September 14, 2010; and Response to Office Action dated June 15, 2010. Stryker reserves the right to rely on Ferno’s intrinsic evidence.	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the definiteness and meaning of the term “elevating mechanism,” how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the term based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and that a POSA would have understood the claim term “elevating mechanism,” to have the meaning of “a mechanism that moves the base frame and the litter frame relative to one another.” Stryker reserves the right to rely on Ferno’s extrinsic evidence. Detect: to discover or determine the existence, presence, or fact of. <i>Detect, Definition</i> , MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003 at Page 340), <i>available at</i> https://www.merriam-webster.com/dictionary/detect (last visited August 9, 2023), <i>See</i> Bates No. FERNO0037502. Detect: to discover the nature, existence, presence, or fact of. <i>Detect, Definition</i> , THE MERRIAM-	Ferno contends that this term is governed by 35 U.S.C. § 112, paragraph 6 (pre-AIA): An elevating mechanism is a structure having a pair of X-frames controlled by an hydraulic circuit that: 1) effects changes in elevation of the litter frame relative to the base frame, and 2) includes a pressure switch capable of detecting a presence and an absence of a weight force urging a change in elevation of the litter frame relative to the base frame.	A. ‘571 Patent, including, but not limited to: FIGS. 15-25; col. 4, ll. 19-23; col. 8, l. 36 – col. 11, l. 21; and Claims 1 and 5-8. B. ‘571 Patent’s Reexam Prosecution history, including, but not limited to: Notice of Intent to Issue Inter Partes Reexamination Certificate dated August 5, 2012; Respondent’s Brief Dated March 1, 2011; Patent Owner’s (Appellant’s) Appeal Brief dated February 1, 2011; Response to Office Action dated September 14, 2010; and Response to Office Action dated June 15, 2010.	<i>See Detect, Definition</i> , MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY, <i>supra</i> ; <i>Force, Definition</i> , MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY, <i>supra</i> ; <i>Hydraulic, Definition</i> , MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY, <i>supra</i> . Urge: to force or impel in an indicated direction or into motion or greater speed. <i>Urge, Definition</i> , MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003), <i>available at</i> https://www.merriam-webster.com/dictionary/urge (last visited July 11, 2023).

APPENDIX A**JOINT DISPUTED CLAIM TERMS CHART**

**Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.
 (“Ferno”), Civ. Action No. 1:22-cv-00588**

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
			WEBSTER DICTIONARY (New Edition 2005 at Page 134), Exhibit C. Detect: notice; discover, find. <i>Detect, Definition</i>, COLLINS ENGLISH DICTIONARY (First Edition 2005 at Page 156), Exhibit D. Frame: an arrangement of structural parts that gives form or support. <i>Frame, Definition</i>, THE MERRIAM-WEBSTER DICTIONARY (New Edition 2005 at Page 197), Exhibit C. Frame: Structure giving shape or support. <i>Frame, Definition</i>, COLLINS ENGLISH DICTIONARY (First Edition 2005 at Page 235), Exhibit D. <i>Ferno Parts Manual</i> for the X1 Powered Ambulance Cot (January 2022, Pub. No. 234-3716-01), (Bates Nos. FERNO0025508; FERNO0025514 to FERNO0025516; FERNO0025527). <i>Ferno Service Procedures Manual</i> for the Power X1 Powered Ambulance Cot (May 2019, Pub. No. 234-3730-00), (Bates Nos. FERNO0025557; FERNO0025563;			

APPENDIX A**JOINT DISPUTED CLAIM TERMS CHART****Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.****(“Ferno”), Civ. Action No. 1:22-cv-00588**

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
			FERNO0025569 to FERNO0025587). <i>Ferno Parts Manual</i> for the iNX Integrated Patient Transport & Loading System (January 2022, Pub. No. 234-3788-01), (Bates Nos. FERNO0025615 to FERNO0025618; FERNO0025637 to FERNO0025650; FERNO0025656 to FERNO0025659). <i>Ferno User's Manual</i> for the iNX Integrated Patient Transport and Loading System (April 2022, Pub. No. 234-3622-08) (Bates Nos. FERNO0005290 to FERNO0005296).			

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JOINT DISPUTED CLAIM TERMS CHART

**Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.
 (“Ferno”), Civ. Action No. 1:22-cv-00588**

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
Stryker’s U.S. Patent No. 7,725,968						
5. “a latch disabler configured to prevent the operation of the latch mechanism by the at least one handle”/ “a pair of latch disablers” U.S. Patent No. 7,725,968 Claims 15,19, 22	Stryker does not think this term requires construction and that the plain and ordinary meaning should be applied. Furthermore, Ferno’s identification of the claim term and its proposed construction have been made in a vacuum and without consideration for the context of the entire claim. Additionally, Ferno improperly incorporates limitations from the specification into the claims. To the extent the Court requires construction, Stryker proposes the following construction for the term “ latch disabler ”: “ <i>Device that prevents operation of the latch mechanism.</i> ”	968 Patent, including but not limited to: Figs. 38-43, 57-58, 62; Col. 16, Ln. 5- Col. 18, Ln. 29; Claims 4, 5, 8, 15, 19, 22. 571 Patent’s Re-exam Prosecution history, including, but not limited to: Order Granting/Denying Request for <i>Inter Partes</i> Reexamination dated April 16, 2010. Stryker reserves the right to rely on Ferno’s intrinsic evidence.	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the definiteness and meaning of the term “latch disabler,” how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the term based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and that a POSA would have understood the claim term “latch disabler” to have the meaning of “device that prevents operation of the latch mechanism.” Stryker reserves the right to rely on Ferno’s extrinsic evidence. Latch: any of various devices in which mating mechanical parts engage to fasten but usually not to lock something. <i>Latch</i> , Definition. MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003 at Page 702), <i>available at</i> https://www.merriam-webster.com/dictionary/latch (last visited August 9, 2023), <i>See</i> Bates No. FERNO0037509. Disable: to stop something such as (part of) a machine, system, or	Ferno contends that this term is governed by 35 U.S.C. § 112, paragraph 6 (pre-AIA): The latch disabler is a mounting bracket that is engaged by a safety bar used to push a blocking pin into a slot to block the travel of a link pin to make the latch mechanism inoperative.	A. ‘968 Patent, including, but not limited to: FIGS. 38, 39, 40, 42, 43, 57, 62; col. 17, ll. 4-9; col. 17, ll. 9-13; col. 17, ll. 14-28; and Claims 4, 5, 8, 15, 19 and 22. B. ‘571 Patent’s Reexam Prosecution history, including, but not limited to: Order Granting/Denying Request for <i>Inter Partes</i> Reexamination dated April 16, 2010.	Disable: to stop something such as (part of) a machine, system, or weapon from working. <i>Disable</i> , Definition, CAMBRIDGE ADVANCED LEARNER’S DICTIONARY (2003), <i>available at</i> https://dictionary.cambridge.org/us/dictionary/english/disable (last visited July 11, 2023). Disable: to make incapable or ineffective. <i>Disable</i> , Definition, MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003), <i>available at</i> https://www.merriam-webster.com/dictionary/disable (last visited July 11, 2023). Latch: any of various devices in which mating mechanical parts engage to fasten but usually not to lock something. <i>Latch</i> , Definition. MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003), <i>available at</i> https://www.merriam-webster.com/dictionary/latch (last visited July 11, 2023). Pin: a piece of solid material (such as wood or metal) used esp. for fastening things together

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JOINT DISPUTED CLAIM TERMS CHART

**Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.
 (“Ferno”), Civ. Action No. 1:22-cv-00588**

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
			weapon from working. <i>Disable, Definition</i>, CAMBRIDGE ADVANCED LEARNER'S DICTIONARY (2003) at Page 345, <i>available at</i> https://dictionary.cambridge.org/us/dictionary/english/disable (last visited August 10, 2023). See Bates No. FERNO0037489. Disable: to make incapable or ineffective. <i>Disable, Definition</i>, MERRIAM-WEBSTER'S COLLEGIATE DICTIONARY (11TH ED. 2003 at Pages 354-355), <i>available at</i> https://www.merriam-webster.com/dictionary/disable (last visited August 10, 2023). See Bates No. FERNO0037503-0037504. <i>Ferno Parts Manual</i> for the iNX Integrated Patient Transport & Loading System (January 2022, Pub. No. 234-3788-01), (Bates Nos. FERNO0025639 to FERNO0025640). <i>Ferno Parts Manual</i> for the Power X1 Powered Ambulance Cot (January 2022, Pub. No. 234-3716-01), (Bates Nos. FERNO0025531 to FERNO0025533).			or as a support by which one thing may be suspended from another. <i>Pin, Definition</i>. MERRIAM-WEBSTER'S COLLEGIATE DICTIONARY (11TH ED. 2003), <i>available at</i> https://www.merriam-webster.com/dictionary/pin (last visited July 19, 2023). Pin: A slender, usu. cylindrical piece of wood or metal for holding or fastening parts together or serving as a support for suspending one thing from another. <i>Pin, Definition</i>, AMERICAN HERITAGE COLLEGE DICTIONARY (3D ED. 1993), <i>available at</i> https://ahdictionary.com/word/search.html?q=pin (last visited July 25, 2023).

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Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.

(“Ferno”), Civ. Action No. 1:22-cv-00588

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
6. “the handle being connected to a pin configured for rotation about the axis of rotation defined by or parallel to the axis of the cross rail” U.S. Patent No. 7,725,968 Claim 1	Stryker does not think this term requires construction and that the plain and ordinary meaning should be applied. Furthermore, Ferno’s identification of the claim term and its proposed construction have been made in a vacuum and without consideration for the context of the entire claim. Additionally, Ferno improperly incorporates limitations from the specification into the claims. To the extent the Court requires construction, Stryker proposes the following: <i>“Handle connected to a protruding component, where the handle is configured to rotate about the axis of rotation defined by or parallel to the axis of the cross rail.”</i>	968 Patent, including, but not limited to: Col. 16, Ln. 7-66, Figures 38-43, 57, 58, 62. Claim 1. Stryker reserves the right to rely on Ferno’s intrinsic evidence.	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the meaning of the term “the handle being connected to a pin configured for rotation about the axis of rotation defined by or parallel to the axis of the cross rail,” how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the term based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and that a POSA would have understood the claim term to have the meaning of “handle connected to a protruding component, where the handle is configured to rotate about the axis of rotation defined by or parallel to the axis of the cross rail.” Stryker reserves the right to rely on Ferno’s extrinsic evidence. Pin: a piece of solid material (as wood or metal) used esp. for fastening things together or as a support by which one thing may be suspended from another. <i>Pin, Definition</i> , MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003 at Page 940), <i>available at</i> https://www.merriam-webster.com/dictionary/pin (last	A handle connected to a cylindrical pin that rotates in an arcuate path relative to the cross rail.	A. ‘968 Patent, including, but not limited to: FIGS. 38-40, 42, 43, 57-58, and 62; col. 16, ll. 40-48 ; col. 16, ll. 63-66; col. 16, ll. 7-62; and Claim 1.	<i>See Pin, Definition</i> , MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY, <i>supra</i> ; <i>Pin, Definition</i> , AMERICAN HERITAGE COLLEGE DICTIONARY, <i>supra</i> .

APPENDIX A**JOINT DISPUTED CLAIM TERMS CHART****Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.****(“Ferno”), Civ. Action No. 1:22-cv-00588**

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
			visited August 9, 2023), See Bates No. FERNO0037514. Pin: wooden or metal peg or stake. <i>Pin, Definition</i>, COLLINS ENGLISH DICTIONARY (First Edition 2005 at Page 436), Exhibit D.			

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**Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.
 (“Ferno”), Civ. Action No. 1:22-cv-00588**

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
7. (a) “blocking pin” (b) “link pin” U.S. Patent No. 7,725,968 Claim 17, 21, 22	Ferno’s identification of the claim terms and their proposed constructions have been made in a vacuum and without consideration for the context of the entire claim. Additionally, Ferno improperly incorporates limitations from the specification into the claims. Stryker proposes the following constructions: (a) “A protruding component that disables or limits the travel of another component.” (b) “A protruding component.”	968 Patent including but not limited to: Figures 37-43, 57-58; Col. 16, Ln. 18-48, Col. 17, Ln. 14-59; Claims 17, 21, 22. Stryker reserves the right to rely on Ferno’s intrinsic evidence.	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the definiteness and meaning of the terms “blocking pin,” and “link pin,” how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the term based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and that a POSA would have understood the claim term “blocking pin,” to have the meaning of “a protruding component that disables or limits the travel of another component,” and the term “link pin” to have the meaning of a protruding component. Stryker reserves the right to rely on Ferno’s extrinsic evidence. Pin: a piece of solid material (as wood or metal) used esp. for fastening things together or as a support by which one thing may be suspended from another. <i>Pin, Definition.</i> MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003 at Page 940), <i>available at</i> https://www.merriam-webster.com/dictionary/pin (last visited August 9, 2023), <i>See</i> Bates No. FERNO0037514.	(a) A blocking pin is a cylindrical pin configured to receive a compression spring and which prevents the travel of a separate, rotating pin through an arcuate slot when the blocking pin is present within the arcuate slot. (b) A link pin is a cylindrical pin which travels in a linear path.	968 Patent, including, but not limited to: FIG. 38, 39, 40, 57, col. 16, ln. 18-30; col. 17, ll. 14-27; col. 17, ll. 40-59; and Claims 17, 21, and 22.	<i>See Pin, Definition,</i> MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY, <i>supra</i> ; <i>Pin, Definition,</i> AMERICAN HERITAGE COLLEGE DICTIONARY, <i>supra</i> . Arcuate: curved like a bow. <i>Arcuate, Definition,</i> MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003), <i>available at</i> https://www.merriam-webster.com/dictionary/arcuate (last visited July 11, 2023). <i>Stryker Operations/Maintenance Manual</i> for the Power-PRO XT (6506-009-001 REV C), (Bates Nos. STRFERNO00009543 to STRFERNO00009750), <i>available at</i> https://techweb.stryker.com/EMS/Ambulance_Cots/6506/1205/6506-009-001C.1.pdf (last visited July 24, 2023).

APPENDIX A**JOINT DISPUTED CLAIM TERMS CHART****Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.****(“Ferno”), Civ. Action No. 1:22-cv-00588**

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
			Pin: wooden or metal peg or stake. <i>Pin, Definition</i>, COLLINS ENGLISH DICTIONARY (First Edition 2005 at Page 436), Exhibit D. <i>Ferno Parts Manual</i> for the Power X1 Powered Ambulance Cot (January 2022, Pub. No. 234-3716-01), (Bates Nos. FERNO0025531 to FERNO0025533). <i>Ferno Parts Manual</i> for the iNX Integrated Patient Transport & Loading System (January 2022, Pub. No. 234-3788-01), (Bates Nos. FERNO0025639 to FERNO0025640).			

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**Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.
 (“Ferno”), Civ. Action No. 1:22-cv-00588**

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
8. <i>retractable pin</i> / <i>retractable latch pin</i> U.S. Patent No. 7,725,968 Claims 6, 21	Ferno’s proposed construction have been made in a vacuum and without consideration for the context of the entire claim. Additionally, Ferno improperly incorporates limitations from the specification into the claims. Stryker proposes the following construction for the terms “retractable pin” and “retractable latch pin”: “A deployable protruding component.”	968 Patent, including, but not limited to: Figures 35-43; Col. 16, Ln. 30-62, Col. 17, Ln. 14-59; Claims 6, 17, 21. Stryker reserves the right to rely on Ferno’s intrinsic evidence.	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the definiteness and meaning of the terms “retractable pin,” and “retractable latch pin,” how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the terms based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and that a POSA would have understood the claim terms “retractable pin,” and “retractable latch pin” to both have the meaning of “a deployable protruding component.” Stryker reserves the right to rely on Ferno’s extrinsic evidence. Pin: a piece of solid material (as wood or metal) used esp. for fastening things together or as a support by which one thing may be suspended from another. <i>Pin</i> , Definition. MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003 at Page 940), available at https://www.merriam-webster.com/dictionary/pin (last visited August 9, 2023), See Bates No. FERNO0037514.	A retractable pin (also referred to as a “retractable latch pin”) is a T-shaped projection which can be pulled back or in to an opening.	A. ‘968 Patent, including, but not limited to: FIGS. 39, 40, 42 and 43; col. 16, ll. 44-62; and Claims 6 and 21.	See <i>Pin</i> , Definition, MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY, <i>supra</i> ; <i>Pin</i> , Definition, AMERICAN HERITAGE COLLEGE DICTIONARY, <i>supra</i> . Retract: to draw or pull back. <i>Retract</i> , Definition. MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003), available at https://www.merriam-webster.com/dictionary/retract (last visited July 11, 2023). Projection: a part that juts out. <i>Projection</i> , Definition, MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003), available at https://www.merriam-webster.com/dictionary/projection (last visited July 11, 2023). <i>Stryker Operations/Maintenance Manual</i> for the Power-PRO XT (6506-009-001 REV C), (Bates Nos. STRFERNO00009543 to STRFERNO00009750), available at https://techweb.stryker.com/EMS/Ambulance_Cots/6506/1205/6506-009-001C.1.pdf (last visited July 24, 2023).

APPENDIX A**JOINT DISPUTED CLAIM TERMS CHART****Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.****(“Ferno”), Civ. Action No. 1:22-cv-00588**

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
			Pin: wooden or metal peg or stake. <i>Pin, Definition</i> , COLLINS ENGLISH DICTIONARY (First Edition 2005 at Page 436), Exhibit D .			

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**Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.
 (“Ferno”), Civ. Action No. 1:22-cv-00588**

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
Stryker’s U.S. Patent No. 8,056,950						
9. <i>(a) “first device”</i> <i>(b) “second device”</i> U.S. Patent No. 8,056,950 Claims 1,2,10	Stryker does not think this term requires construction and that the plain and ordinary meaning should be applied. Furthermore, Ferno’s identification of the claim term and its proposed construction have been made in a vacuum and without consideration for the context of the entire claim. Additionally, Ferno improperly incorporates limitations from the specification into the claims. To the extent the Court requires construction, Stryker proposes the following: <i>(a) “A first device is a first piece of equipment or mechanism.”</i> <i>(b) “A second device is a second piece of equipment or mechanism.”</i>	950 Patent including, but not limited to: Col. 8, Ln. 39-Col. 10, Ln. 29; Claims 1-4, 10, 11. 950 Patent prosecution history, including, but not limited to: Response to Office Action dated May 24, 2011. Stryker reserves the right to rely on Ferno’s intrinsic evidence.	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the definiteness and meaning of the terms “first device,” and “second device,” how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the terms based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and that a POSA would have understood the claim term “first device,” to have the meaning of “a first piece of equipment or mechanism,” and the claim term “second device” to have the meaning of “a second piece of equipment or mechanism.” Stryker reserves the right to rely on Ferno’s extrinsic evidence. Device: a piece of equipment or a mechanism for a special purpose. <i>Device, Definition</i> , THE MERRIAM-WEBSTER DICTIONARY (New Edition 2005 at Page 135), Exhibit C . Device: Machine or tool used for a specific task... <i>Device, Definition</i> , COLLINS ENGLISH DICTIONARY	<i>(a) A transducer capable of detecting the presence of a magnetic field.</i> <i>(b) A rod having a magnet thereon.</i>	A. ‘950 Patent, including, but not limited to: col. 10, ll. 20-29; and Claims 1, 2, 3, 4, 10 and 11. B. ‘950 Patent prosecution history, including, but not limited to: Response to Office Action dated May 24, 2011.	Transducer: a device that is actuated by power from one system and supplies power usually in another form to a second system. <i>Transducer, Definition</i> , MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003), <i>available at</i> https://www.merriam-webster.com/dictionary/transducer (last visited July 11, 2023). Magnetic Field: the portion of space near a magnetic body or a current-carrying body in which the magnetic forces due to the body or current can be detected. <i>Magnetic Field, Definition</i> , MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003), <i>available at</i> https://www.merriam-webster.com/dictionary/magnetic%20field last visited (July 11, 2023). Rod: a long, thin pole made of wood or metal. <i>Rod, Definition</i> , CAMBRIDGE ADVANCED LEARNER’S DICTIONARY (2003), <i>available at</i> https://dictionary.cambridge.org/us/dictionary/english/rod (last visited July 11, 2023).

APPENDIX A**JOINT DISPUTED CLAIM TERMS CHART****Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.****(“Ferno”), Civ. Action No. 1:22-cv-00588**

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
			(First Edition 2005 at Page 157), Exhibit D. Device: a piece of equipment or a mechanism designed to serve a special purpose or perform a special function. <i>Device, Definition</i>, MERRIAM-WEBSTER'S COLLEGIATE DICTIONARY (11TH ED. 2003 at Page 342), <i>available at</i> https://www.merriam-webster.com/dictionary/device (last visited August 9, 2023), Exhibit B.			

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**Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.
 (“Ferno”), Civ. Action No. 1:22-cv-00588**

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
10. (a) “at least one of said first and second devices being configured (1) to operatively determine the presence and absence of said ambulance cot in said cargo area and (2) to render said drive mechanism inoperative in response to a determination that said ambulance cot is present in said cargo area” (b) “at least one of said first and second devices being configured (1) to operatively determine the presence and absence of said ambulance cot in said cargo area and (2) to render said drive motor	Stryker does not think this term requires construction and that the plain and ordinary meaning should be applied. Furthermore, Ferno’s identification of the claim term and its proposed construction have been made in a vacuum and without consideration for the context of the entire claim. Additionally, Ferno improperly incorporates limitations from the specification into the claims. To the extent the Court requires construction, Stryker proposes the following: <i>“At least one of said first and second devices rendering the drive mechanism inoperative when the cot is docked.”</i>	950 Patent, including, but not limited to: Figure 27; Col. 9, Ln. 45-Col. 10, Ln. 29; Claims 1-4, 10. 950 Patent Prosecution history, including, but not limited to: Response to Office Action dated May 24, 2011. Stryker reserves the right to rely on Ferno’s intrinsic evidence.	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the definiteness and meaning of the term “at least one of said first and second devices being configured (1) to operatively determine the presence and absence of said ambulance cot in said cargo area and (2) to render said drive mechanism [or motor] inoperative in response to a determination that said ambulance cot is present in said cargo area,” how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the term based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and that a POSA would have understood the claim term “at least one of said first and second devices being configured (1) to operatively determine the presence and absence of said ambulance cot in said cargo area and (2) to render said drive mechanism [or motor] inoperative in response to a determination that said ambulance cot is present in said cargo area” to have the meaning of “at least one of said first and second devices rendering the drive mechanism inoperative when the cot is docked.”	Ferno contends that this term is governed by 35 U.S.C. § 112, paragraph 6 (pre-AIA): A transducer in a cargo area that detects a presence or absence of a magnetic field provided by a magnet attached to a rod on the cot, the transducer rendering the drive mechanism (also referred to as the drive motor) inoperative when the magnet is positioned with respect to the transducer and the transducer detects the magnetic field of the magnet.	A. ‘950 Patent, including, but not limited to: FIG. 27; col. 10, ll. 18-29; Claims 1, 4 and 10. B. ‘950 Patent Prosecution history, including, but not limited to: Response to Office Action dated May 24, 2011	<i>See Transducer, Definition, MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY, supra; Detect, Definition, MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY, supra; Magnetic Field, Definition, MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY, supra.</i>

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Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.
(“Ferno”), Civ. Action No. 1:22-cv-00588

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
inoperative in response to a determination that said ambulance cot is present in said cargo area” U.S. Patent No. 8,056,950 Claims 1 and 10			Stryker reserves the right to rely on Ferno’s extrinsic evidence. Device: a piece of equipment or a mechanism for a special purpose. <i>Device, Definition</i>, THE MERRIAM-WEBSTER DICTIONARY (New Edition 2005 at Page 135), Exhibit C. Device: Machine or tool used for a specific task... <i>Device, Definition</i>, COLLINS ENGLISH DICTIONARY (First Edition 2005 at Page 157), Exhibit D. Device: a piece of equipment or a mechanism designed to serve a special purpose or perform a special function. <i>Device, Definition</i>, MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003 at Page 342), <i>available at</i> https://www.merriam-webster.com/dictionary/device (last visited August 9, 2023), Exhibit B.			

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Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
Stryker’s U.S. Patent No. 10,058,464						
11. “spring configured to apply a pre-load” U.S. Patent No. 10,058,464 Claim 9	Stryker does not think this term requires construction and that the plain and ordinary meaning should be applied. Furthermore, Ferno’s identification of the claim term and its proposed construction have been made in a vacuum and without consideration for the context of the entire claim. Additionally, Ferno improperly incorporates limitations from the specification into the claims. To the extent the Court requires construction, Stryker proposes the following: <i>“A component having elastic properties that applies a force.”</i>	464 Patent, including, but not limited to: Figures 13-16; Col. 2, Ln. 56-58, Col. 3, Ln. 1-47, Col. 4, Ln. 17-22, Col. 10, Ln. 13-35; Claims 1, 8-9, 18. Stryker reserves the right to rely on Ferno’s intrinsic evidence.	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the definiteness and meaning of the term “spring configured to apply a pre-load,” how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the term based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and that a POSA would have understood the claim term “spring configured to apply a pre-load” to have the meaning of “a component having elastic properties that applies a force.” Stryker reserves the right to rely on Ferno’s extrinsic evidence. Spring: An elastic component which stores mechanical energy and exerts a force when deformed. <i>Spring, Definition</i> , Tony Atkins, Marcel Escudier, <u>Oxford Dictionary of Mechanical Engineering</u> , First Edition, 2013 at Page 344, Exhibit F . Spring: An elastic, stressed, stored-energy machine element that, when released, will recover its basic form or position. <i>Spring, Definition</i> , The	As the parties have agreed to a construction of the term “spring,” Ferno proposes construction of the term “preload,” as “a force in a direction opposed to said cot loading direction.”	A. ‘464 Patent, including, but not limited to: col. 3, ll. 1-4; col. 3, ll. 5-7; col. 4, ll. 17-22; col. 10, ll. 23-35; and Claims 1 and 9. B. ‘207 Patent, including, but not limited to: col. 3, ll. 4-7; col. 3, ll. 8-10; col. 4, ll. 20-25; col. 10, ll. 26-38; and Claims 1 and 9.	<i>See Spring, Definition</i> , MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY, <i>supra</i> ; <i>Force, Definition</i> , MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY, <i>supra</i> . Oppose: to place opposite or against something. <i>Oppose, Definition</i> , MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003), <i>available at</i> https://www.merriam-webster.com/dictionary/oppose (last visited July 11, 2023). Compress: to reduce in size, quantity, or volume as if by squeezing. <i>Compress, Definition</i> , MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003), <i>available at</i> https://www.merriam-webster.com/dictionary/compress (last visited July 11, 2023).

APPENDIX A**JOINT DISPUTED CLAIM TERMS CHART**

**Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.
 (“Ferno”), Civ. Action No. 1:22-cv-00588**

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
			McGraw-Hill Dictionary of Engineering, Second Edition, 2003 at Page 523, Exhibit E. Spring: an elastic body or device that recovers its original shape when released after being distorted. <i>Spring, Definition</i>, MERRIAM-WEBSTER'S COLLEGIATE DICTIONARY (11TH ED. 2003 at Page 1209), <i>available at</i> https://www.merriam-webster.com/dictionary/spring (last accessed August 9, 2023), <i>See</i> Bates No. FERNO0037521. <i>Ferno PRO F1 Release Button Assembly Kit 080-6062</i> (Bates Nos. FERNO0024895 to FERNO0024902).			

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**Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.
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Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
12. “an overload spring to prevent said release mechanism from being overloaded” U.S. Patent No. 10,058,464 Claim 21	Stryker does not think this term requires construction and that the plain and ordinary meaning should be applied. Furthermore, Ferno’s identification of the claim term and its proposed construction have been made in a vacuum and without consideration for the context of the entire claim. Additionally, Ferno improperly incorporates limitations from the specification into the claims. To the extent the Court requires construction, Stryker proposes the following: <i>“A component having elastic properties to prevent the release mechanism from being overloaded.”</i>	464 Patent including, but not limited to: Figures 13, 14, 14A, 14B; Col. 8, Ln. 27-45, Col. 9, Ln. 8-41; Claim 21. Stryker reserves the right to rely on Ferno’s intrinsic evidence.	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the definiteness and meaning of the term “overload spring,” how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the term based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and that a POSA would have understood the claim term “overload spring,” to have the meaning of “a component having elastic properties to prevent the release mechanism from being overloaded.” Stryker reserves the right to rely on Ferno’s extrinsic evidence. Spring: An elastic component which stores mechanical energy and exerts a force when deformed. <i>Spring, Definition</i> , Tony Atkins, Marcel Escudier, <u>Oxford Dictionary of Mechanical Engineering</u> , First Edition, 2013 at Page 344, Exhibit F . Spring: An elastic, stressed, stored-energy machine element that, when released, will recover its basic form or position. <i>Spring, Definition</i> , <u>The McGraw-Hill Dictionary of</u>	An overload spring is a component having elastic properties capable of limiting the force applied to the release mechanism.	A. ‘464 Patent, including, but not limited to: FIGS. 13, 14, 14A, 14B; col. 8, ll. 27-45; col. 9, ll. 8-31; and Claim 21. B. ‘207 Patent, including, but not limited to: FIGS. 13, 14, 14A, and 14B; col. 9, ll. 10-41; and Claim 21.	<i>See Spring, Definition</i> , MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY, <i>supra</i> ; <i>Spring, Definition</i> , AMERICAN HERITAGE COLLEGE DICTIONARY, <i>supra</i> ; <i>Compress, Definition</i> , MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY, <i>supra</i> .

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Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
			Engineering, Second Edition, 2003 at Page 523, Exhibit E. Spring: an elastic body or device that recovers its original shape when released after being distorted. <i>Spring, Definition</i>, MERRIAM-WEBSTER'S COLLEGIATE DICTIONARY (11TH ED. 2003 at Page 1209), <i>available at</i> https://www.merriam-webster.com/dictionary/spring (last accessed August 9, 2023), See Bates No. FERNO0037521. <i>Ferno PRO F1 Release Button Assembly Kit 080-6062</i> (Bates Nos. FERNO0024895 to FERNO0024902).			

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**Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.
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Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
13. <i>“pair of spring biased arms”</i> U.S. Patent No. 10,058,464 Claim 12 U.S. Patent No. 11,090,207 Claims 5 and 6 <i>“said arms are biased toward each other by springs”</i> U.S. Patent No. 10,058,464 Claim 15	Stryker does not think this term requires construction and that the plain and ordinary meaning should be applied. Furthermore, Ferno’s identification of the claim term and its proposed construction have been made in a vacuum and without consideration for the context of the entire claim. Additionally, Ferno improperly incorporates limitations from the specification into the claims. To the extent the Court requires construction, Stryker proposes the following for both terms: <i>“set of spring biased levers.”</i>	464 Patent, including, without limitation: Figures 13, 14 and 14A; Col. 2, Ln. 50-55, Col. 3, Ln. 10-47, Col. 8, Ln. 1-63, Col. 9, Ln. 15-39, Col. 10, Ln. 13-35; Claims 12-22. 207 Patent, including, without limitation: Figures 13, 14 and 14A ; Col. 2, Ln. 53-58, Col. 3, Ln. 13-50, Col. 8, Ln. 3-65, Col. 9, Ln. 17-42, Col. 10, Ln. 16-38. Claims 5-6. Stryker reserves the right to rely on Ferno’s intrinsic evidence.	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the definiteness and meaning of the terms “pair of spring biased arms” and “said arms are biased toward each other by springs,” how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the term based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and that a POSA would have understood the claim terms “pair of spring biased arms” and “said arms are biased toward each other by springs,” to have the meaning of a “set of spring biased levers.” Stryker reserves the right to rely on Ferno’s extrinsic evidence.	As the parties have agreed to a construction of the term “spring” and the phrase “a pair of arms,” Ferno contends that the only remaining term in dispute is “biased.” Ferno defines the phrase “pair of spring biased arms” as, “a set of levers to which a component having elastic properties applies a steady and continual force,” and the term “biased” as, “pushed by a steady and continual force.”	A. ‘464 Patent, including, without limitation: FIGS. 13, 14 and 14A; col. 3, ll. 19-24; col. 8, ll. 17-23; and Claims 12, 13, 14, 15 and 22. B. ‘207 Patent, including, without limitation: FIGS. 13, 14 and 14A; col. 3, ll. 22-27; and Claims 5 and 6.	<i>See Spring, Definition, MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY, supra; Spring, Definition, AMERICAN HERITAGE COLLEGE DICTIONARY, supra.</i>

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**Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.
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Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
Stryker’s U.S. Patent No. 11,090,207						
14. “spring for biasing the cot in a direction opposed from said loading direction of said frame to thereby apply a pre-load” U.S. Patent No. 11,090,207 Claim 1	Stryker does not think this term requires construction and that the plain and ordinary meaning should be applied. Furthermore, Ferno’s identification of the claim term and its proposed construction have been made in a vacuum and without consideration for the context of the entire claim. Additionally, Ferno improperly incorporates limitations from the specification into the claims. To the extent the Court requires construction, Stryker proposes the following: <i>“A component having elastic properties that applies a force opposed to the loading direction.”</i>	207 Patent including, but not limited to: Figures 13-16; Abstract, Col. 2, Ln. 59-61, Col. 3, Ln. 3-12, Col. 3, Ln. 40-50, Col. 4, Ln. 20-25, Col. 10, Ln. 16-38; Claims 1, 9. Stryker reserves the right to rely on Ferno’s intrinsic evidence.	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the definiteness and meaning of the term “spring for biasing the cot in a direction opposed from said loading direction of said frame to thereby apply a pre-load,” how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the term based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and that a POSA would have understood the claim term “spring for biasing the cot in a direction opposed from said loading direction of said frame to thereby apply a pre-load,” to have the meaning of “a component having elastic properties that applies a force opposed to the loading direction.” Stryker reserves the right to rely on Ferno’s extrinsic evidence. Spring: An elastic component which stores mechanical energy and exerts a force when deformed. <i>Spring, Definition</i> , Tony Atkins, Marcel Escudier, <i>Oxford Dictionary of Mechanical Engineering</i> , First	As the parties have agreed to a construction of the term “spring,” Ferno contends that the only remaining term in dispute, is “biasing.” Ferno defines biasing as: “applying a steady and continual force to.”	A. ‘464 Patent, including, but not limited to: col. 3, ll. 1-4; col. 3, ll. 5-7; col. 4, ll. 17-22; col. 10, ll. 23-35; and Claims 1 and 9. B. ‘207 Patent, including, but not limited to: col. 3, ll. 4-7; col. 3, ll. 8-10; col. 4, ll. 20-25; col. 10, ll. 26-38; and Claims 1 and 9.	<i>See Spring, Definition</i> , MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY, <i>supra</i> ; <i>Force, Definition</i> , MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY, <i>supra</i> . Oppose: to place opposite or against something. <i>Oppose, Definition</i> , MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003), <i>available at</i> https://www.merriam-webster.com/dictionary/oppose (last visited July 11, 2023). Compress: to reduce in size, quantity, or volume as if by squeezing. <i>Compress, Definition</i> , MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY (11TH ED. 2003), <i>available at</i> https://www.merriam-webster.com/dictionary/compress (last visited July 11, 2023).

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**Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.
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			Edition, 2013 at Page 344, Exhibit F. Spring: An elastic, stressed, stored-energy machine element that, when released, will recover its basic form or position. <i>Spring, Definition, The McGraw-Hill Dictionary of Engineering</i>, Second Edition, 2003 at Page 523, Exhibit E. Spring: an elastic body or device that recovers its original shape when released after being distorted. <i>Spring, Definition</i>, MERRIAM-WEBSTER'S COLLEGIATE DICTIONARY (11TH ED. 2003 at Page 1209), <i>available at</i> https://www.merriam-webster.com/dictionary/spring (last accessed August 9, 2023), <i>See</i> Bates No. FERNO0037521. <i>Ferno PRO F1 Release Button Assembly Kit 080-6062</i> (Bates Nos. FERNO0024895 to FERNO0024902).			

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(“Ferno”), Civ. Action No. 1:22-cv-00588

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Ferno's U.S. Patent No. 10,568,787						
15. “spaced-apart and aligned coaxially” (Stryker) “spaced-apart and aligned coaxially with respect to each other in the loading direction along the longitudinal length in a fixed relationship between the first and second ends” (Ferno) U.S. Patent No. 10,568,787 Claim 1	Indefinite. In addition to being inconsistent with the remainder of the claim (e.g. “wherein the second central channel is arranged lower in height relative to the floor than said first central channel such that the first fixture passes over the second central channel when the cot is moved in the loading direction”), the specification fails to describe or even mention “aligned coaxially,” as used in the claims. Consequently, the meaning of “spaced-apart and aligned coaxially” is unclear and indefinite. To the extent the Court finds this not to be indefinite, Stryker proposes the following construction for the term “spaced-apart and aligned coaxially”: “Positioned at different locations along the longitudinal length and	787 Prosecution History, including, but not limited to: Amendment in Response to the May 31, 2019 Office Action [dated August 29, 2019], at Pages 4, 9-10; 787 Patent, including, but not limited to: Col. 7, Ln. 20-29; Col. 12, Ln. 57-58; Col. 13, Ln. 22; Figure 15 (including corresponding text); Claim 1; PCT/US2015/045832, including, but not limited to: Paras. [0069], [0090]-[0092]; and any statements made during the prosecution of pending or granted US and foreign counterparts, including, for example, AU2020202388, AU2020264407, CA3152741, CA2956815, EP3556335, EP3182947, EP3936103, JP6647284, JP6956815, and US11458050.	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the term “spaced-apart and aligned coaxially,” how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the term based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and, to the extent that the term is found to be not indefinite, that a POSA would have understood the phrase “spaced-apart and aligned coaxially” to have the meaning of “positioned at different locations along the longitudinal length and sharing an identical common axis.” 2013 Oxford Dictionary of Mechanical Engineering Definition of “Coaxial”: “coaxial A term for components having a common axis such as concentric shafts.” Tony Atkins, Marcel Escudier, <u>Oxford Dictionary of Mechanical Engineering (Exhibit F)</u> , Page 57, First Edition, 2013 Merriam-Webster Definition of “Coaxial”: “adj: having coincident axes – coaxially adv”	Ferno proposes the following construction for the term “spaced-apart and aligned coaxially with respect to each other in the loading direction along the longitudinal length in a fixed relationship between the first and second ends”: Positionally fixed at different locations between the first and second ends along a common, longitudinal axis extending parallel to the loading direction.	787 Patent at: FIG. 13 & Col. 14, l. 1–9; FIG. 24 & Col. 16, l. 58–60; Col. 17, l. 4; FIG. 27 & Col. 17, l. 24–60; and FIG. 21 and 27, Col. 18, l. 60–Col. 19, l. 3. Any intrinsic evidence cited by Stryker.	Any extrinsic evidence cited by Stryker.

APPENDIX A**JOINT DISPUTED CLAIM TERMS CHART**

**Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.
 (“Ferno”), Civ. Action No. 1:22-cv-00588**

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
	<i>sharing an identical common axis.”</i>		Merriam-Webster, Incorporated, <u>Merriam-Webster’s Dictionary and Thesaurus (Exhibit G)</u>, Page 148, 15th Printing, 2014 Merriam-Webster Definitions of “Align”: “vb 1: to bring into line...” Merriam-Webster, Incorporated, <u>Merriam-Webster’s Dictionary and Thesaurus (Exhibit G)</u>, Page 22, 15th Printing, 2014 “vb: bring into line...” Federal Street Press, A Division of Merriam-Webster, Incorporated, <u>Webster’s American English Dictionary Expanded Edition (Exhibit H)</u>, Page 10, Copyright 2013 Longman Dictionary Definition of “Align”: “2 to arrange something so that it is in the same line as something else: <i>It looks like your wheels need aligning.</i>” Pearson Education Limited, <u>Longman Dictionary of American English (Exhibit I)</u>, Page 29, Fifth Edition, Copyright 2014			

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JOINT DISPUTED CLAIM TERMS CHART

Stryker Corporation and Stryker Sales, LLC ("Stryker") v. Ferno-Washington, Inc. and Ferno Group, Inc.

("Ferno"), Civ. Action No. 1:22-cv-00588

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
16. "sidewalls" (Stryker) "a pair of opposed sidewalls" (Ferno) U.S. Patent No. 10,568,787 Claim 3	Stryker proposes the following construction for the term "sidewalls": <i>"Vertical sides of a housing."</i>	787 Patent, including, but not limited to: Col. 16, Ln. 26-Col. 17, Ln. 24; Col. 18, Ln. 21-49; Col. 20, Ln. 51-64; Figures: 23, 27, 31 (including corresponding text); Claim 3; PCT/US2015/045832, including, but not limited to: Paras. [00102]-[00106], [00108]-[00109], [00116]; and any statements made during the prosecution of pending or granted US and foreign counterparts, including, for example, AU2020202388, AU2020264407, CA3152741, CA2956815, EP3556335, EP3182947, EP3936103, JP6647284, JP6956815, and US11458050.	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the meaning of the term "sidewalls," how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the term based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and that a POSA would have understood the claim term "sidewalls" to have the meaning of "vertical sides of a housing."	Ferno proposes the following construction for the term "a pair of opposed sidewalls": Opposing exterior surfaces of a track, which engage or come into contact with the load wheels of the cot.	787 Patent at: Col. 16, l. 26-57; Col. 16, l. 65-Col. 17, l. 23; Col. 17, l. 34-38; Col. 18, l. 21-26; and Claim 12.	Any extrinsic evidence cited by Stryker.

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**Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.
 (“Ferno”), Civ. Action No. 1:22-cv-00588**

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
17. “adjacent” U.S. Patent No. 10,568,787 Claim 16	<i>“Adjoining.”</i>	787 Patent, including, but not limited to: Abstract; Col. 1, Ln. 60-18-23; Col. 2, Ln. 30-39; Col. 9, Ln. 42-47; Col. 10, Ln. 19-26; Col. 10, Ln. 35-57; Col. 11 Ln. 22-45; Col. 12, Ln. 54-57; Col. 15, Ln. 8-15; Col. 17, Ln. 31-60; Col. 18, Ln. 57-60; Col. 19, Ln. 59-63; Col. 20, Ln. 51-64; Col. 21, Ln. 19-25; Claims: 14, 16, 17, 18; PCT/US2015/045832, including, but not limited to: Abstract; Paras. [0007], [0011]-[0012], [0021], [0031], [0074], [0077], [0079], [0081]-[0082], [0085], [0090], [0098], [00106], [00110], [00113], [00116], [00118]; and any statements made during the prosecution of pending or granted US and foreign counterparts, including, for example, AU2020202388, AU2020264407, CA3152741, CA2956815, EP3556335, EP3182947, EP3936103, JP6647284,	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the meaning of the term “adjacent,” how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the term based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and that a POSA would have understood the claim term “adjacent” to have the meaning of “adjoining.” Merriam-Webster Definition of “Adjacent”: “ <i>adj</i> : situated near or next” “ <i>adv</i> : adjoining, contiguous, touching.; also close, closets, immediate, near, nearby, neighboring, next, nigh” Merriam-Webster, Incorporated, <u>Merriam-Webster’s Dictionary and Thesaurus (Exhibit G)</u> , Page 12, 15th Printing, 2014 Merriam-Webster Definition of “Adjoining”: “ <i>adj</i> : touching or bounding at a point or line...adjacent, contiguous, touching” Merriam-Webster, Incorporated, <u>Merriam-Webster’s Dictionary and Thesaurus (Exhibit G)</u> , Page 12, 15th Printing, 2014	No construction necessary; plain and ordinary meaning, which is “situated near or next to.”	Any intrinsic evidence cited by Stryker.	Definition of “Adjacent”: “adj: situated near or next” Merriam-Webster, Inc., Merriam-Webster’s Dictionary and Thesaurus (Stryker Exhibit G), Page 12, 15th Printing, 2014. Any extrinsic evidence cited by Stryker.

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Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
		JP6956815, and US11458050.	Merriam-Webster Definitions of “Adjoin”: “2: to be situated next to...[2] abut, border (on)...touch” Merriam-Webster, Incorporated, <u>Merriam-Webster’s Dictionary and Thesaurus (Exhibit G)</u> , Page 12, 15th Printing, 2014 “vb: be next to” Federal Street Press, A Division of Merriam-Webster, Incorporated, <u>Webster’s American English Dictionary Expanded Edition (Exhibit H)</u> , Page 5, Copyright 2013			

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**Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.
 (“Ferno”), Civ. Action No. 1:22-cv-00588**

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
18. “cot fastener track has a fixed safety hook” (Stryker) “fixed” (Ferno) U.S. Patent No. 10,568,787 Claim 16	Stryker proposes the following construction for the term “cot fastener track has a fixed safety hook”: “Cot fastener track includes a safety hook affixed thereto.”	787 Patent, including, but not limited to: Col. 9, Ln. 23-41; Col. 10, Ln. 41-57; Col. 14, Ln. 49-Col. 15, Ln. 37; Col. 20, Ln. 10-40; Figures: 5B, 27 (including corresponding text); Claim 16; PCT/US2015/045832, including, but not limited to: Paras. [0076], [0082], [0097], [00114]-[00115]; and any statements made during the prosecution of pending or granted US and foreign counterparts, including, for example, AU2020202388, AU2020264407, CA3152741, CA2956815, EP3556335, EP3182947, EP3936103, JP6647284, JP6956815, and US11458050	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the meaning of the term “cot fastener track has a fixed safety hook,” how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the term based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and that a POSA would have understood the claim term “cot fastener track has a fixed safety hook” to have the meaning of “cot fastener track includes a safety hook affixed thereto.” Merriam-Webster Definitions of “Fixed”: “ <i>adj</i> 1: securely placed or fastened: STATIONARY...3 not subject to change or fluctuation...” Merriam-Webster, Incorporated, <u>Merriam-Webster’s Dictionary and Thesaurus (Exhibit G)</u> , Page 316, 15th Printing, 2014 “ <i>adj</i> 1: stationary 2: settled” Federal Street Press, A Division of Merriam-Webster, Incorporated, <u>Webster’s American English Dictionary Expanded Edition (Exhibit H)</u> , Page 130, Copyright 2013	Ferno proposes the following construction for the term “fixed”: Operationally immovable.	787 Patent at: Col. 9, l. 23–41; Col. 10, l. 41–57; Col. 14, l. 49–Col. 15, l. 7; Col. 20, l. 10–40; and Claims 17–19. Any intrinsic evidence cited by Stryker.	Definition of “Fixed” (adj.): “1a: securely placed or fastened: STATIONARY” Marriam-Webster, Inc., Merriam-Webster’s Dictionary, <i>available at</i> https://www.merriam-webster.com/dictionary/fix (last accessed Aug. 28, 2023). Definition of “Stationary” (adj.): “1: fixed in a station, course, or mode: IMMOBILE” Marriam-Webster, Inc., Merriam-Webster’s Dictionary, <i>available at</i> https://www.merriam-webster.com/dictionary/stationary (last accessed Aug. 28, 2023). Any extrinsic evidence cited by Stryker.

APPENDIX A**JOINT DISPUTED CLAIM TERMS CHART****Stryker Corporation and Stryker Sales, LLC (“Stryker”) v. Ferno-Washington, Inc. and Ferno Group, Inc.****(“Ferno”), Civ. Action No. 1:22-cv-00588**

Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
			Longman Dictionary Definition of “Fixed”: <i>adj. “2 firmly fastened to something and in a particular position: a mirror fixed to the wall”</i> Pearson Education Limited, Longman Dictionary of American English (Exhibit I), Page 428, Fifth Edition, Copyright 2014			

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Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
19. “operably selectable between secure and unsecure conditions” U.S. Patent No. 10,568,787 Claim 20;	<i>“To switch the cot fastening system between unsecure and secure conditions in response to an affirmative action by a user.”</i>	787 Patent, including, but not limited to: Col. 2, Ln. 1-5; Col. 2, Ln. 36-38; Col. 8, Ln. 15-Col. 9, Ln. 1; Col. 13, Ln. 42-65; Col. 14, Ln. 18-48; Col. 17, Ln. 61-Col. 18, Ln. 11; Col. 19, Ln. 4-58; Claims: 6, 20; PCT/US2015/045832, including, but not limited to: Paras. [0007], [0014], [0073], [0075], [0094], [0096], [00107], [0111], [0112]; 050 Patent, including, but not limited to: Col. 2, Ln. 4-8; Col. 2, Ln. 39-41; Col. 13, Ln. 47-Col. 15, Ln. 31; Col. 19, Ln. 9-63; Claims: 1, 8; U.S. App. No. 16/746,085 (as-filed), including, but not limited to: Paras. [0007], [0014], [0073], [0076], [0094], [0096]-[0097], [00107], [00111], [00112], [00114]; and any statements made during the prosecution of pending or granted US and foreign counterparts,	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the meaning of the term “operably selectable between secure and unsecure conditions,” how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the term based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and that a POSA would have understood the claim term “operably selectable between secure and unsecure conditions” to have the meaning of “to switch the cot fastening system between unsecure and secure conditions in response to an affirmative action by a user.” Merriam-Webster Definitions of “Operable”: “ <i>adj</i> 1: fit, possible, or desirable to use...functional, practicable, serviceable, useable...” Merriam-Webster, Incorporated, <u>Merriam-Webster’s Dictionary and Thesaurus (Exhibit G)</u> , Page 584, 15th Printing, 2014 “ <i>adj</i> 1: usable or in working condition” Federal Street Press, A Division of Merriam-Webster, Incorporated, <u>Webster’s American English</u>	“Capable of being switched from an unsecure to secure condition or a secure to an unsecure condition.”	787 Patent at: Col. 17, l. 61–Col. 18, l. 11; Col. 19, l. 17–32, 44–53; and Claim 8. Any intrinsic evidence cited by Stryker.	Any extrinsic evidence cited by Stryker.

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Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
		including, for example, AU2020202388, AU2020264407, CA3152741, CA2956815, EP3556335, EP3182947, EP3936103, JP6647284, and JP6956815.	<u>Dictionary Expanded Edition (Exhibit H)</u>, Page 241, Copyright 2013 Merriam-Webster Definitions of “Select”: “vb : to choose from a number or group : pick out...choose, [], elect, [], opt, pick...” Merriam-Webster, Incorporated, <u>Merriam-Webster’s Dictionary and Thesaurus (Exhibit G)</u>, Page 747, 15th Printing, 2014 “vb: take by preference” Federal Street Press, A Division of Merriam-Webster, Incorporated, <u>Webster’s American English Dictionary Expanded Edition (Exhibit H)</u>, Page 312, Copyright 2013			

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Disputed Claim Term	Stryker Proposed Construction	Stryker Citation To Intrinsic Evidence	Stryker Citation to Proposed Extrinsic Evidence (Appendix O)	Ferno Proposed Construction	Ferno Citation To Intrinsic Evidence	Ferno Citation to Proposed Extrinsic Evidence (Appendix P)
Ferno's U.S. Patent No. 11,458,050						
20. "open side rails" (Stryker) "a pair of open side rails" (Ferno) U.S. Patent No. 11,458,050 Claims 1,7,15	Indefinite. To the extent the Court finds this not to be indefinite, Stryker proposes the following construction for the term "open side rails": <i>"A pair of rails, each of which has a c-shaped cross-sectional profile."</i>	050 Patent, including, but not limited to: Abstract; Col. 1, Ln. 55-Col. 3, Ln. 10; Col. 12, Ln. 27-37; Col. 14, Ln. 15-23; Figures 13, 16-8, 27 (including corresponding text); Claims: 1, 2, 3, 7, 9, 11, 15; U.S. App. No. 16/746,085 (as-filed), including, but not limited to: Abstract; Paras. [0007]-[0009], [0013], [0015], [0017], [0021], [0088], [0096], [00106]; and any statements made during the prosecution of pending or granted US and foreign counterparts, including, for example, AU2020202388, AU2020264407, CA3152741, CA2956815, EP3556335, EP3182947, EP3936103, JP6647284, JP6956815, and US10568787.	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the term "open side rails," how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the term based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and, to the extent that this term is found to be not indefinite, that a POSA would have understood the claim term "open side rails" to have the meaning of "a pair of rails each of which has a c-shaped cross-sectional profile."	Ferno proposes the following construction for the term "a pair of open side rails": Opposing exterior surfaces of a track, which engage or come into contact with the load wheels of the cot.	'050 Patent at: Col. 1, l. 55–Col. 2, l. 17; Col. 16, l. 36–44; Col. 17, l. 3–28; Col. 17, l. 39–43; Col. 18, l. 26–31; and Claims 2 & 3. Any intrinsic evidence cited by Stryker.	Any extrinsic evidence cited by Stryker.

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21. "configured to align therewith, accommodate therein and guide together the first fixture of the cot" (Stryker) "a channel centrally located between the open side rails, said open side rails configured to align therewith, accommodate therein and guide together the first fixture of the cot along the longitudinal length of the cot fastener track towards the first end as the cot is rolled by the wheels within the vehicle" (Ferno) U.S. Patent No. 11,458,050 Claims 1,15	Indefinite. To the extent the Court finds this not to be indefinite, Stryker proposes the following construction for the phrase "configured to align therewith, accommodate therein and guide together the first fixture of the cot": <i>"Configured to receive the first fixture within the c-shaped cross-sectional profile to align and guide the first fixture of the cot."</i>	050 Patent, including, but not limited to: Abstract, Col. 1, Ln. 55-Col. 3, Ln. 10; Col. 12, Ln. 27-37; Col. 14, Ln. 15-23; Col. 15 Ln. 53-56, Col. 16, Ln. 31-44; Figures 13, 16-18, 27 (including corresponding text); Claims 1, 15; U.S. App. No. 16/746,085 (as-filed), including, but not limited to: Abstract, Paras. [0007]-[0009]; [0013], [0015], [0017], [0021], [0088]; [0096], [00100], [00102], [00106]; and any statements made during the prosecution of pending or granted US and foreign counterparts, including, for example, AU2020202388, AU2020264407, CA3152741, CA2956815, EP3556335, EP3182947, EP3936103, JP6647284, JP6956815, and US10568787.	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the term "configured to align therewith, accommodate therein and guide together the first fixture of the cot," how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the term based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and, to the extent that this term is found to be not indefinite, that a POSA would have understood the claim term "configured to align therewith, accommodate therein and guide together the first fixture of the cot" to have the meaning of "configured to receive the first fixture within the c-shaped cross-sectional profile to align and guide the first fixture of the cot."	<u>Claim 1</u>: "capable of directing the first fixture of the cot along the longitudinal axis of the cot fastener track extending parallel to the loading direction, such that the first fixture is oriented upon a common longitudinal axis with a channel centered between the open side rails, said channel providing sufficient space for the first fixture to travel the longitudinal length of the cot fastener track towards the first end as the cot is rolled by the wheels within the vehicle." <u>Claim 15</u>: "capable of directing the first fixture of the cot along the longitudinal axis of the cot fastener track extending parallel to the loading direction, such that the first fixture is oriented upon a common longitudinal axis between the open side rails with sufficient space for the first fixture to travel the longitudinal length of the cot fastener track towards the first end."	050 Patent at: FIG. 7, Col. 8, l. 40-53. Any intrinsic evidence cited by Stryker.	Any extrinsic evidence cited by Stryker.

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22. “proceeding claims” U.S. Patent No. 11,458,050 Claim 15	Indefinite. This term fails to meet the requirements of 35 U.S.C. § 112(b). To the extent the Court finds this not to be indefinite, Stryker proposes the following construction: <i>“Following claims.”</i>	‘050 Patent, including, but not limited to: Claim 15; Claim 15 is the last claim in the ‘050 Patent. There are no “proceeding claims” after Claim 15.	Expert opinions and/or testimony from Dr. Pinhas Ben-Tzvi regarding the term “proceeding claims,” how a person of ordinary skill in the art (POSA) at the time of the invention would have understood the term based on the disclosures in the patent specifications, other intrinsic and extrinsic evidence, the knowledge of a POSA, and his experience, and, to the extent that this term is found to be not indefinite, that a POSA would have understood the claim term “proceeding claims” to have the meaning of “following claims.” Merriam-Webster Definitions of “Proceed”: “vb 1: to come forth: ISSUE 2: to go on in an orderly way; also: CONTINUE 3: to begin and carry on an action...” Merriam-Webster, Incorporated, <u>Merriam-Webster’s Dictionary and Thesaurus (Exhibit G)</u> , Page 655, 15th Printing, 2014 “vb 1: come forth 2: go on in an orderly way 3: begin and carry on an action 4: advance” Federal Street Press, A Division of Merriam-Webster, Incorporated, <u>Webster’s American English Dictionary Expanded Edition (Exhibit H)</u> , Page 274, Copyright 2013	Preceding.	‘050 Patent at: Col. 2, l. 62–67. Any intrinsic evidence cited by Stryker.	Any extrinsic evidence cited by Stryker.

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23. “operably selectable between secure and unsecure conditions” U.S. Patent No. 11,458,050 Claim 1	See Ferno’s U.S. Patent No. 10,568,787 (above) at term number 19 (Claim 16).					

* This chart does not contain legal argument.