UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

OLLNOVA TECHNOLOGIES LTD., Plaintiff, v. CARRIER GLOBAL CORPORATION, Defendant.	Case No. 9:22-cv-80388-DMM JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION CHART

I. Undisputed Constructions

N/A

II. Disputed Constructions

#	Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
1	"to selectively operate the transceiver" '887 Patent, Claim 1	No construction necessary. Plain and ordinary meaning.	Plain and ordinary meaning: To communicate information during the transmission period in response to a triggering event.
2	"wherein transmission of the most recent reading of the indicator stored in the memory during the period of the transmission interval is suspended in response to detecting a change in the sensed condition within the predetermined range." '887 Patent, Claim 1	No construction necessary. Plain and ordinary meaning.	Plain and ordinary meaning: Wherein the most recent reading of the indicator stored in the memory during the period of the transmission interval is identified as pending transmission but not transmitted in response to detecting a change in the sensed condition within the predetermined range.

#	Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
3	"chance" '887 Patent, Claim 1	Change.	Plaintiff's claim construction of this term is improper because this limitation is not in the claims in view of the Certificate of Correction issued on February 8, 2022.
4	"associated reading of the indicator" '887 Patent, Claim 1	Associated with the reading of the indicator.	Plaintiff's claim construction of this term is improper because this limitation is not in the claims in view of the Certificate of Correction issued on March 22, 2022.
5	"a most recent reading of the indicator…" '887 Patent, Claim 1	No construction necessary. Plain and ordinary meaning.	*Indefinite*
6	"transceiver" '887 Patent, Claim 1	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*
7	"controller" '887 Patent, Claim 1	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*
8	"wireless automation device" '887 Patent, Claims 1, 3, 4, 5, 6, 7, 8, 14, 15, 18	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*
9	"multi-sensor package" '282 Patent, Claims 1, 7, 13, 20	A single packaged sensor device, not a group of individual sensors.	A device that contains multiple sensors, but not a group of individual sensors, configured to detect values and variables related to multiple sensed properties.
10	"sensor package" '282 Patent, Claims 1, 2, 7, 8, 13, 14	No construction necessary. Plain and ordinary meaning.	Device that contains a sensor configured to detect values and variables related to a single sensed property.
11	"sensor control information" '282 Patent, Claims 1, 5	No construction necessary. Plain and ordinary meaning.	Plain and ordinary meaning: Information identifying the sensor and/or sensor value driving or controlling a receiving device during a scan cycle.

#	Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
12	"processor in communication with the wireless communications component and the sensor package" '282 Patent, Claims 1, 7, 13	No construction necessary. Plain and ordinary meaning.	*Indefinite*
13	"receive sensor control information related to sensor data in control at a second automation component" '282 Patent, Claims 1, 7, 13	No construction necessary. Plain and ordinary meaning.	*Indefinite*
14	"automation component" '282 Patent, Claims 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 17, 19, 20	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*
15	"first automation component" '282 Patent, Claim 20	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*
16	"second automation component" '282 Patent, Claims 1, 5, 7, 11, 13, 17, 19, 20	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*
17	"wherein the computer readable instructions are programmed to: receive sensor control information related to sensor data in control at a second automation component in communication with the building automation system; and communicate a portion of the stored sensor data corresponding to the received sensor control information to the second automation component" '282 Patent, Claim 1	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*
18	"wherein the computer readable instructions are programmed to: receive status data related to sensor data in control at a second automation component in communication with the building automation system; determine the sensor data in control at the second automation component based on the received status data; and communicate the stored sensor data	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*

#	Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
	corresponding the sensor data in control to the second automation component" '282 Patent, Claim 7		
19	"wherein the computer readable instructions are programmed to: receive a wake-up command from a second automation component; communicate stored sensor data related to the sensor data in control at a second automation component; and receive a power-down command from the second automation component" '282 Patent, Claim 13	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*
20	"identify sensor values within the sensor data that exceed a corresponding change-of-value threshold" '282 Patent, Claims 3, 9	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*
21	"set an identification flag for each identified sensor value" '282 Patent, Claims 4, 10	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*
22	"communicate all of the stored sensor data corresponding to the received sensor control information to the second automation component" '282 Patent, Claims, 5, 11, 17	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*
23	"wherein all of the stored sensor data is communicated at a regular interval" '282 Patent, Claim 6	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*
24	"receive status information related to sensor data in control at a second automation component" '282 Patent, Claim 19	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*
25	"wherein identifying changed sensor values includes identifying changed	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*

#	Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
	sensor values as a function of a change-of-value threshold" '282 Patent, Claim 21		
26	"change-of-value request" '371 Patent, Claims 1, 2, 6	No construction necessary. Plain and ordinary meaning.	Plain and ordinary meaning: Communication requesting locally detected values, received values, parameters, or measurements beyond a pre-defined reporting limit.
27	"change-of-value update" '371 Patent, Claims 1, 4, 5, 6, 13, 14, 15	No construction necessary. Plain and ordinary meaning.	Plain and ordinary meaning: Communication containing queued change-of-value messages.
28	"change-of-value messages" '371 Patent, Claims 1, 13	No construction necessary. Plain and ordinary meaning.	Plain and ordinary meaning: Communication, that excludes change-of-value request, indicating changes in locally detected values, received values, parameters, or measurements beyond a pre-defined reporting limit.
29	"change-of-value acknowledgement" '371 Patent, Claims 1, 13	No construction necessary. Plain and ordinary meaning.	Plain and ordinary meaning: Communication indicating receipt of changes to locally detected values, received values, parameters, or measurements beyond a pre-defined reporting limit.
30	"wherein the computer readable instructions are programmed to: process a change-of-value request message received via the wireless communications component; generate a change-of-value update in response to the change-of-value request message, wherein the change-of-value update includes a plurality of change-of-value messages received from a plurality of devices; and communicate" '371 Patent, Claim 1	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*

#	Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
31	"wherein the computer readable instructions are programmed to: receive at least one change-of-value update via the wireless communications component, wherein the change-of-value update includes a plurality of change-of-value messages received from a plurality of devices; storing the at least one change-of-value update corresponding to at least one wireless device; and communicate the at least one change-of-value update in response to a polling request and repeat the at least one change-of-value update at regular intervals according to a schedule or until a change-of value acknowledgment is received" '371 Patent, Claim 13	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*
32	"wherein the change-of-value update is a change-of-value response message" '371 Patent, Claim 4	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*
33	"wherein the change-of-value update is automatically communicated" '371 Patent, Claim 5	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*
34	"wherein the change-of-value update is pulled to a field panel transceiver in response to the reception of the change-of-value request message by the wireless communication component" '371 Patent, Claim 6	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*
35	"wherein the change-of-value update is a pushed communication" '371 Patent, Claim 15	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*
36	"automation component" '371 Patent, Claims 1, 2, 3, 4, 5, 6, 13,	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*

#	Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
	14, 15, 16		
37	"wireless device" '371 Patent, Claims 2, 3, 14	No construction necessary. Plain and ordinary meaning.	*Indefinite means-plus-function*

Dated: December 5, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the counsel of record who are deemed to have consented to electronic service are being served on December 5, 2022 with a copy of this document via the Court's ECF system.

/s/ Joshua D. Martin
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