

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

MULTIQUIP INC.,

Plaintiff,

v.

ANA, INC.,

Defendant.

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CIVIL ACTION NO. 3:22-cv-2599

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION CHART

Pursuant to the Court's Scheduling Order and Rule 4-5 of Miscellaneous Order No. 62, Plaintiff Multiquip Inc. ("Plaintiff") and Defendant Alliance North America dba ANA ("Defendant") hereby respectfully submit this Joint Claim Construction Chart.

Dated: September 11, 2023

Respectfully submitted,

/s/ James L. Etheridge

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CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all counsel of record by ECF on
September 11, 2023.

/s/ James L. Etheridge

James L. Etheridge

1. An engine-generator and load bank system comprising: an engine mechanically connected to and capable of driving an alternator, said engine having an engine control module and a [1] **particulate filter**; said alternator in [2] **electrical communication** with an output bus and a load bank bus; at least one load monitoring device in **electrical communication** with said output and load bank buses; [3] **a generator controller comprising a load dump output and a load enable output**, said generator controller in **electrical communication** with said engine control module; [4] **a load bank controller comprising a load enable input, a load dump input, a load sensor**, and at least one load step output; said load dump output in **electrical communication** with said load dump input; said load enable output in **electrical communication** with said load enable input; said load monitoring device in **electrical communication** with said load sensor, at least one load step contactor in **electrical communication** with said at least one load step output; and at least one [5] **load step resistor** in **electrical communication** with said load bank bus by way of said at least one load step contactor; wherein said generator controller provides a control signal via said load enable output in at least one of the following cases: [6] **neglect** and [7] **regeneration**; and wherein said generator controller provides a control signal via said load dump output in case of a load spike.

Term	Multiquip	ANA	Court
[1] “particulate filter”	component used to reduce particles or particulate matter from the exhaust stream of an engine	A filter located in the exhaust system that captures soot from the engine exhaust, to be burned off via regeneration.	
[2] “electrical communication”	a direct or indirect electrical connection	Configured to allow electrical signals to be sent there between	
[3] “a generator controller comprising a load dump output and a load enable output”	No construction necessary	An electronic controller of the generator that includes two separate output connections, one a load dump output through which a signal is sent to the load bank controller to cause the load bank to disconnect from the generator, and the other a load enable output through which a signal is sent to the load bank controller to connect the load	

		bank to the generator, either entirely or in stages	
[4] “a load bank controller comprising a load enable input, a load dump input, a load sensor”	No construction necessary	An electronic controller of the load bank that has a load sensor and two separate input connections for receiving signals from the separate generator controller, one connection receives a signal that at least part of the load bank is to be connected to the generator and the other connection receives a signal that the entire load bank is to be disconnected from the generator all at once.	
[5] “load step resistor”	one of a group of electrical resistors in a load bank that can add or subtract load in an electric circuit	A component that adds a step of resistance in a circuit.	
[6] “neglect”	an operating condition of a generator in which its load for a preset duration of time drops below a preset level at which wet stacking and soot buildup will occur	Invalid as indefinite – but in the alternative: The engine is intentionally allowed to operate in a sub optimal state for more than a short duration until wet stacking and soot build up in the exhaust system will occur.	
[7] “regeneration” [AGREED]	[AGREED]	[AGREED]	a process in which an engine doses a particulate filter with diesel fuel then ignites the diesel fuel to burn off accumulated soot

19. An engine-generator and load bank system comprising: an engine mechanically connected to and capable of driving an alternator, said engine having an engine control module and a [1] **particulate filter**; said alternator in [2] **electrical communication** with an output bus and a load bank bus; a generator controller in **electrical communication** with said engine control module, said generator controller having at least one load step output; at least one load step contactor in **electrical communication** with said at least one load step output; and at least one [5] **load step resistor** in **electrical communication** with said load bank bus by way of said at least one load step contactor; wherein said generator controller is capable of operating said load step contactor to connect said **load step resistor** in at least one of the following cases: [6] **neglect** and [7] **regeneration**; and wherein said generator controller is capable of operating said load step contactor to disconnect said **load step resistor** in case of a load spike.

Term	Multiquip	ANA	Court
[1] “particulate filter”	component used to reduce particles or particulate matter from the exhaust stream of an engine	A filter located in the exhaust system that captures soot from the engine exhaust, to be burned off via regeneration.	
[2] “electrical communication”	a direct or indirect electrical connection	Configured to allow electrical signals to be sent there between	
[5] “load step resistor”	one of a group of electrical resistors in a load bank that can add or subtract load in an electric circuit	A component that adds a step of resistance in a circuit.	
[6] “neglect”	an operating condition of a generator in which its load for a preset duration of time drops below a preset level at which wet stacking and soot buildup will occur	Invalid as indefinite – but in the alternative: The engine is intentionally allowed to operate in a sub optimal state for more than a short duration until wet stacking and soot build up in the exhaust system will occur.	
[7] “regeneration” [AGREED]	[AGREED]	[AGREED]	a process in which an engine doses a particulate filter with diesel fuel then ignites the

			diesel fuel to burn off accumulated soot
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- 3. The engine-generator and load bank system of claim 1 comprising one **load step resistor**.
- 4. The engine-generator and load bank system of claim 1 comprising a plurality of **load step resistors**.
- 10. The engine-generator and load bank system of claim 1 wherein said alternator, output bus, load bank bus, and at least one **load step resistor** comprise a poly-phase electrical system.
- 11. The engine-generator and load bank system of claim 1 wherein said alternator, output bus, load bank bus, and at least one **load step resistor** comprise a three-phase electrical system.
- 13. The engine-generator and load bank system of claim 1 wherein said at least one **load step resistor** is physically located in an enclosure connected to the radiator of said engine.
- 14. The engine-generator and load bank system of claim 1 wherein said at least one **load step resistor** is located remotely from said engine-generator.
- 22. The engine-generator and load bank system of claim 19 comprising a plurality of **load step resistors**.
- 28. The engine-generator and load bank system of claim 19 wherein said alternator, output bus, load bank bus, and at least one **load step resistor** comprise a poly-phase electrical system.
- 29. The engine-generator and load bank system of claim 19 wherein said alternator, output bus, load bank bus, and at least one **load step resistor** comprise a three-phase electrical system.
- 31. The engine-generator and load bank system of claim 19 wherein said at least one **load step resistor** is physically located in an enclosure connected to the radiator of said engine.
- 32. The engine-generator and load bank system of claim 19 wherein said at least one **load step resistor** is located remotely from said engine-generator.
- 34. The engine-generator and load bank system of claim 19 wherein the generator controller is configured to operate said load step contactor to disconnect said **load step resistor** within 10 seconds.
- 35. The engine-generator and load bank system of claim 19 wherein the generator controller is configured to operate said load step contactor to disconnect said **load step resistor** within 1 seconds.
- 36. The engine-generator and load bank system of claim 19 wherein the generator controller is configured to operate said load step contactor to disconnect said **load step resistor** within 0.1 seconds.

Term	Multiquip	ANA	Court
[5] “load step resistor”	one of a group of electrical resistors in a load bank that can add or subtract load in an electric circuit	A component that adds a step of resistance in a circuit.	