

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HENGST SE,

Plaintiff,

v.

CHAMPION LABORATORIES, INC.,

Defendant.

Case No. 23-cv-00794

Judge Sara L. Ellis

Magistrate Judge Heather K. McShain

PLAINTIFF’S LOCAL PATENT RULE 4.1
EXCHANGE OF PROPOSED CLAIM TERMS

Pursuant to Scheduling Order [20] and Local Patent Rule (“LPR”) 4.1, Plaintiff Hengst SE (“Hengst” or “Plaintiff”), by and through its undersigned counsel, submits the following with respect to the claims 15-17, 19, 23-25, 28, and 30 (the “Asserted Claims”) of U.S. Patent No. 9,023,203 (the “’203 Patent”) in its action against Defendant Champion Laboratories, Inc. (“Champion” or “Defendant”).

1. LPR 4.1(a)(i) Plaintiff’s Contended Claim Terms and Phrases that the Court Should Construe

Hengst contends that the Court need not construe any claim terms or phrases in the Asserted Claims. All claim terms and phrases in the Asserted Claims should be given their plain and ordinary meaning. However, based on Champion’s apparent construction in its Final Infringement Contentions and Final Invalidity Contentions, Hengst submits that the following terms and phrases of the Asserted Patent should be considered by the Court during claim construction:

- “arranged on”
- “panel”

- “rotating the ring filter insert relative to the filter housing”

2. LPR 4.1(a)(ii) Plaintiff’s Proposed Constructions

Consistent with the plain and ordinary meaning of the term or phrase, Hengst submits that the following claim terms and phrases should be construed as follows:

Claim Term or Phrase	Proposed Construction
“arranged on”	Positioned on or disposed on
“panel”	Covering structure formed from one or more elements
“rotating the ring filter insert relative to the filter housing”	Twisting or spinning at least a portion of the ring filter insert relative to the filter housing

3. LPR 4.1(a)(iii) Plaintiff’s Contended Claim Element Governed by 35 U.S.C. § 112(6)

Hengst contends that no claim elements in the Asserted Claims should be governed by 35 U.S.C. § 112(6).

4. LPR 4.1(a)(iv) Plaintiff’s Contended Identification of Structure and Function Pursuant to its LPR 4.1(a)(iii) Contentions

N/A.

Dated this 27th day of February 2024.

Respectfully submitted,

/s/ Patrick J. Smith
 Kevin W. Guynn
 Patrick J. Smith
 Justin T. Joseph
 Andrew D. Burnham
 Greer, Burns & Crain, Ltd.
 300 South Wacker Drive, Suite 2500
 Chicago, Illinois 60606
 312.360.0080 / 312.360.9315 (facsimile)
 psmith@gbc.law
 jjoseph@gbc.law
 aburnham@gbc.law

Counsel for Plaintiff Hengst SE

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of February 2024, I served a copy of the foregoing on the following:

Dave Nelson
Athena Dalton
Quinn Emmanuel Urquhart & Sullivan, LLP
191 N. Wacker Dr., Ste 2700
Chicago, IL 60606
Tel.: 312-705-7400
davenelson@quinnemanuel.com
athenadalton@quinnemanuel.com

Matthew Robson
Jim Glass
Quinn Emmanuel Urquhart & Sullivan, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010
Tel.: 212-849-7000
matthewrobson@quinnemanuel.com
jimglass@quinnemanuel.com

By: /s/ Andrew D. Burnham