

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

ARMATURENFABRIK FRANZ
SCHNEIDER GMBH + CO. KG,

Plaintiff,

v.

RJ MACHINE COMPANY, INC.,

Defendant.

Case No. 6:23-cv-00680-AM-DTG

**DEFENDANT RJ MACHINE COMPANY, INC.’S PROPOSED
CLAIM CONSTRUCTIONS**

On May 1, 2024, Defendant RJ Machine Company, Inc. (“RJ Machine”) identified claim terms/phrases of U.S. Patent No. 9,851,030 (“the ’030 Patent”) that should be construed or found indefinite by the Court. Plaintiff Armaturenfabrik Franz Schneider GMBH + Co. KG (“AS-Schneider”) did not identify any claim terms/phrase for construction. Pursuant to the Court’s Standing Order Governing Proceedings (OGP) 4.4—Patent Cases, dated January 23, 2024, and the Scheduling Order (Dkt. 14), RJ Machine hereby provides its proposed preliminary constructions.

Term No.	Term	Proposed Construction
1	“the connecting unit is designed as a nut unit with a female thread and an inwardly pointing inner flange which is arranged in the lower edge region,” (claim 1)	Indefinite
2	“the outwardly pointing outer flange of the first connecting device fits behind the inner flange of the nut unit” (claim 1)	Indefinite
3	“...by means of the inner flange and	Subject to 35 U.S.C. §112(f) (means-plus

	the outer flange the end-face sealing surfaces are clamped together with sealing effect,” (claim 1)	function) <u>Function</u> : the first connecting device and the second connecting device are sealed together <u>Structure</u> : an outer flange and an inner flange clamped together by female threads of a nut engaging male threads of the second connecting device such that end-face sealing surface 43 clamps to end-face sealing surface 33 to create a seal, as shown in Fig 1
4	“a longitudinal axis of which extends obliquely to a longitudinal axis of the apparatus,” (claim 1)	Indefinite
5	“the outer flange and the inner flange are provided in an encompassing manner on the first connecting device or on the nut unit,” (claim 1)	Indefinite
6	“sealing means are arranged between the end-face sealing surface of the first connecting device and the end-face sealing surface of the second connecting device” (claim 1)	Subject to 35 U.S.C. §112(f) (means-plus function) <u>Function</u> : a seal is created between the end-face sealing surface of the first connecting device and the end-face sealing surface of the second connecting device <u>Structure</u> : O-rings consisting of sealing plastic such as PTFE, elastomer or graphite that are arranged inside a groove; an end-face coating made of sealing material; or a face-turned surface on the first connecting device and a projecting nose unit on the second connecting device

RJ Machine’s proposed constructions are preliminary, as they are based on its current knowledge, its current understanding of AS-Schneider’s infringement contentions and implied claim constructions, and its investigation to date. RJ Machine’s investigation and discovery are ongoing. RJ Machine reserves the right to modify, amend, or supplement this disclosure based on, without limitation, claim terms/phrases identified by and constructions proposed by AS-

Schneider, information learned during the meet and confer process with AS-Schneider, information learned during this case, and any changes to AS-Schneider's infringement contentions. RJ Machine further reserves the right to adopt the "plain and ordinary meaning" of any claim term/phrase.

Dated: May 15, 2024

Respectfully submitted,

By: /s/ Domingo M. Llagostera

Domingo M. Llagostera
State Bar No. 24070157
domingo.llagostera@blankrome.com
BLANK ROME LLP
717 Texas Avenue, Suite 1400
Houston, TX 77002
Telephone: (713) 632-8682
Facsimile: (713) 228-6605

J. Hoke ("Trey") Peacock III
Texas Bar No. 15679380
tpeacock@susmangodfrey.com
Shawn L. Raymond
Texas Bar No. 24009236
sraymond@susmangodfrey.com
Michael Kelso
Texas Bar No. 24092617
mkelso@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, TX 77002-5096
Telephone: (713) 651-9366
Facsimile: (713) 654-6666

Counsel for RJ Machine Company, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record were electronically served with a copy of the foregoing on May 15, 2024, via electronic mail.

/s/ *M'Liss Hindman*

M'Liss Hindman