

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

Tangent Technologies, LLC,

Plaintiff,

v.

Recycled Plastics Industries, LLC,

Defendant.

Case No.: 1:23-cv-00261-WCG

Hon. William C. Griesbach

PLAINTIFF’S PROPOSED CONSTRUCTIONS FOR DISPUTED CLAIM TERMS

Pursuant to the Court’s Scheduling Order (Dkt. 37), Plaintiff Tangent Technologies, LLC hereby provides its preliminary proposed constructions of disputed claim terms. Plaintiff reserves the right to amend, modify, or supplement its constructions as necessary based on further discovery and in response to the constructions provided by Defendant.

Term	Proposed Construction
“substantially uninterrupted curvilinear path originating proximate the first side of the board and terminating proximate the second side of the board” (’350 Patent, claim 1)	Plain meaning consistent with the intrinsic evidence, which is: “path with minimal gaps and curves originating near the first side of the board and terminating near the second side of the board”
“substantially uninterrupted curvilinear path in the second direction originating proximate the first side and terminating proximate the second side” (’350 Patent, claim 10)	Plain meaning consistent with the intrinsic evidence, which is: “path with minimal gaps and curves in the second direction originating near the first side and terminating near the second side”

Term	Proposed Construction
“substantially uninterrupted curvilinear path in the second direction originating proximate an outer surface of a first portion of the substrate and terminating proximate an outer surface of a second portion of the substrate” (’350 Patent, claim 20)	Plain meaning consistent with the intrinsic evidence, which is: “path with minimal gaps and curves in the second direction originating near an outer surface of a first portion of the substrate and terminating near an outer surface of a second portion of the substrate”
“substantially uninterrupted curvilinear path originating from proximate the first side of the core and terminating proximate the second side of the core” (’350 Patent, claim 24)	Plain meaning consistent with the intrinsic evidence, which is: “path with minimal gaps and curves originating near the first side of the core and terminating near the second side of the core”
“natural wood-grained” (’350 Patent, body of claims 10, 20) “wood grain” (’350 Patent, claim 5)	Plain meaning consistent with the intrinsic evidence, which is: “arrangement of multiple color lines to resemble wood growth rings”
“natural wood-grained” (’350 Patent, preamble of claims 1, 10, 20, 24)	No construction necessary.
“board” (’350 Patent, claims 1-3, 5-7, 9, 16-17, 24)	No construction necessary. To the extent the Court determines a construction is necessary, plain meaning consistent with the intrinsic evidence, which is: “processed base material”
“substrate” (’350 Patent, claims 10-13, 15, 18-23)	No construction necessary. To the extent the Court determines a construction is necessary, plain meaning consistent with the intrinsic evidence, which is: “base material”
“length” (’350 Patent, claims 9, 15, 20) “length direction” (’350 Patent, claims 1, 3, 17, 24)	No construction necessary. To the extent the Court determines a construction is necessary, plain meaning consistent with the intrinsic evidence, which is: “a dimension different than a width dimension and a height dimension”

Term	Proposed Construction
“first direction” (’350 Patent, claims 10, 19, 20)	No construction necessary. To the extent the Court determines a construction is necessary, plain meaning consistent with the intrinsic evidence, which is: “a direction different than a second direction and a third direction”
“alternate within the board” (’350 Patent, claim 1)	No construction necessary. To the extent the Court determines a construction is necessary, plain meaning consistent with the intrinsic evidence, which is: “are interspersed within the board”
“alternate within the core of the substrate” (’350 Patent, claims 10, 19)	No construction necessary. To the extent the Court determines a construction is necessary, plain meaning consistent with the intrinsic evidence, which is: “are interspersed within the core of the substrate”
“alternate within the core of the board” (’350 Patent, claim 17)	No construction necessary. To the extent the Court determines a construction is necessary, plain meaning consistent with the intrinsic evidence, which is: “are interspersed within the core of the board”
“alternate within the substrate” (’350 Patent, claim 20)	No construction necessary. To the extent the Court determines a construction is necessary, plain meaning consistent with the intrinsic evidence, which is: “are interspersed within the substrate”
“alternate within the core” (’350 Patent, claim 24)	No construction necessary. To the extent the Court determines a construction is necessary, plain meaning consistent with the intrinsic evidence, which is: “are interspersed within the core”
“the ornamental design for a wood-grained polymer board, as shown and described” (’234 Patent)	“A wood-grained polymer board as shown in Figures 1 and 2”
“the ornamental design for a wood-grained polymer board, as shown and described” (’235 Patent)	“A wood-grained polymer board as shown in Figures 1 and 2”

Dated: April 26, 2024

TANGENT TECHNOLOGIES, LLC

By: /s/ James Oehler

Michael Chu (IL Bar No. 6210133)

mchu@mwe.com

Amol Parikh (IL Bar No. 6285077)

amparikh@mwe.com

James Oehler (IL Bar No. 6301897)

joeehler@mwe.com

MCDERMOTT WILL & EMERY LLP

444 West Lake Street

Chicago, IL 60606-0029

Tele: +1 312 372 2000

Fax: +1 312 984 7700

Attorneys for Plaintiff