HILL WALLACK LLP

21 Roszel Road, P.O. Box 5226
Princeton, NJ 08540-5226
main 609.924.0808
fax 609.452.1888

WRITER'S DIRECT DIAL: (609) 734-6358

October 29, 2024

***Via ECF*:**
Honorable Robert Kirsch, U.S.D.J.
United States District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: *Cambridge Mobile Telematics, Inc. v. Sfara, Inc.*, Case No.: 3:23-cv-01368-RK-RLS

Dear Judge Kirsch:

This firm, along with Goodwin Procter, represents Plaintiff Cambridge Mobile Telematics, Inc. in the above-captioned matter. Pursuant to the Court's Order (Dkt. No. 146), we write jointly with Daignault Iyer, counsel for Defendant Sfara, Inc., to provide the Court a proposal for the *Markman* hearing scheduled for November 12, 2024.

Plaintiff and Defendant (together, the "Parties") have met and conferred and propose that the Parties argue the following terms in the following order:

Order	Term	Patent	Claims
1	"telematics data"	'037	1, 2, 4, 5, 9, 10, 20, 23, 26, and 27
2	"automatically generating"	'037	1, 10
3[1]	"human-readable prose documentation"	'037	1, 20
	"narrative"	'037	1, 17, 20
4	"features of the vehicle crash"	'037	1, 10-16, 18, 20
5	"operate the plurality of sensors" / "operating a plurality of sensors"	'368	1, 17
6	"a mode-determining component operable to detect whether the device is in the vehicle . . ." / "generating, via the mode-determining component, an in-vehicle signal . . ."	'952	1, 7, 13
7	"wherein said mode-determining component is further operable to generate a crash mode signal. . . " / "generating, via the mode-determining component, a crash mode signal . . ."	'952	1, 7, 13
8	"a comparing component . . . " / "generating, via a comparing component . . ."	'946	1, 8, 15

[1] The Parties propose combining the argument for the terms "human-readable prose documentation" and "narrative."

Sfara Exhibit 2016
CMT v. Sfara - IPR 2024-00966

9	"an identifying component . . ." / "identifying, via an identifying component . . ."	'946	1, 8, 15

The Parties propose that the terms will be argued seriatim, with argument by both Parties as to the first term (opening, response, etc.), then argument as to the second term, and so on. The Parties propose alternating arguing first for each term with Sfara arguing first for the terms at order number 1, 3, 5, 7, and 9; and CMT arguing first for the terms at order number 2, 4, 6, and 8.

The Parties will forgo calling live witnesses during the *Markman* hearing.

If it is helpful to the Court, the Parties can be prepared to offer a short (e.g., ten (10) minutes per side) technology tutorial through attorney presentation as the Court may direct.

The Parties respectfully request the use of the Court's laptop computer video hookup via the NOMAD station (including access to the document camera).

The Parties agree that demonstratives to be used at the hearing will be exchanged electronically between the Parties one (1) hour in advance of the hearing and two hardcopies will be exchanged at the start of the hearing. Hard copies of demonstratives will be provided to the Court at the start of the hearing and lodged electronically with the Court after the hearing.

We appreciate the Court's attention to this matter and are available should Your Honor or Your Honor's staff require anything further.

Respectfully submitted,

/s/ William P. Murtha
WILLIAM P. MURTHA

CC: All counsel of record via ECF