EXHIBIT 12

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U.S. Patent No. 11,674,517 Claim	Abbott's '517 Accused Products[1]
1. A system for assisting the blood circulation of a heart, comprising:	Abbott has made, used, sold, offered for sale, and/or imported into the United States and is currently making, using, selling, offering for sale and/or importing into the United States products that infringe one or more claims of the '517 patent (the "'517 Accused Products"). Abbott's '517 Accused Products include, but are not necessarily limited to, Abbott's HeartMate 3 Left Ventricular Assist System (LVAS) system ("HeartMate 3")[2], and any other Abbott products, either alone or in combination, that operate in a reasonably similar manner. For example, and to the extent that Abbott argues that the preamble is a limitation, HeartMate 3 is a system for assisting the blood circulation of a heart, as recited by claim 1. As shown in the exemplary images below from Abbott's documentation for the HeartMate 3 products, the HeartMate 3 is configured such that when implanted and assembled, it "assumes some or all of the workload of the left ventricle" to assist the heart in circulating blood. **Overview** The HeartMate 3™ Left Ventricular Assist System (LVAS) is a set of equipment and materials that together comprise a medical device designed to provide therapeutic benefit to those affected with advanced heart failure. In service, the LVAS assumes some or all of the workload of the left ventricle, thereby restoring the patient's systemic perfusion while palliating the underlying pathology. The LVAS features a Left Ventricular Assist Device (LVAD), a blood pump intended for long-term implantation in such patients, an extracorporeal Controller, plus all of the features, controls, attachments, interfaces, power sources, supporting equipment, labeling, and tools required to achieve the desired therapeutic benefit. The HeartMate 3 Left Ventricular Assist System is intended for use inside or outside the hospital, or for transportation of LVAD patients via ground ambulance, airplane, or helicopter.

[1] These allegations are exemplary. Discovery from Abbott has not yet begun, and may uncover additional Abbott products that infringe the '517 patent literally or under the doctrine of equivalents. The Court has also not yet construed any terms from any claims of the '517 patent. Thus, Plaintiff reserves the right to supplement these allegations as the case progresses through discovery and the claim construction process.

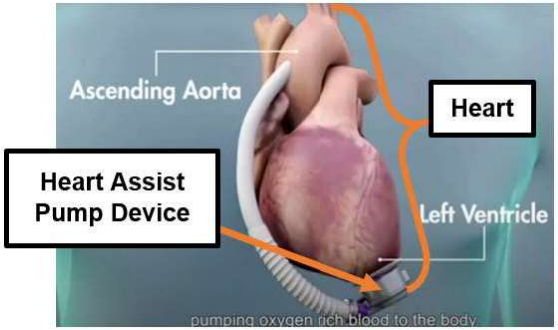
[2] The claim chart herein cites to exemplary evidence regarding Abbott's HeartMate 3 products, as products that infringe the '517 patent.

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U.S. Patent No. 11,674,517 Claim	Abbott's '517 Accused Products[1]
	 Exemplary Sources[3]: "HeartMate 3™ Left Ventricular Assist System Instructions for Use" at pages marked "1-3" – available for download at https://manuals.sjm.com/Search-Form?re=North-America&cc=US&ln=EN&ct=professional&qry=heartmate&ipp=10[4] via https://manuals.sjm.com/~/media/manuals/product-manual-pdfs/5/7/571a1818-2da2-4c1a-b454-f6f5a3bc39b6.pdf. *See also* the evidence and analysis for the claim elements discussed below.

[3] The sources identified herein are merely exemplary.
[4] All hyperlinks cited herein were last accessed 20 November, 2023.

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U.S. Patent No. 11,674,517 Claim	Abbott's '517 Accused Products[1]
a heart assist pump device deliverable to the heart and comprising:	Abbott's '517 Accused Products include a heart assist pump device deliverable to the heart. For example, the HeartMate 3 products include a Left Ventricular Assist Device (LVAD), a heart assist pump device configured to be delivered to a patient's heart, as shown in the exemplary annotated[5] image below:  Exemplary Source: Video titled "HeartMate 3 LVAD Patient Education Program – (2) System Overview," available at https://www.youtube.com/watch?v=hmmpIKzmKe0. *See also* the evidence and analysis for the Preamble above and the other claim elements discussed herein.
an inflow tube defining a blood inflow path and having a suction end insertable into a ventricle of the heart;	Abbott's '517 Accused Products include an inflow tube defining a blood inflow path and having a suction end insertable into a ventricle of the heart. For example, as shown in the annotated image below, HeartMate 3's LVAD heart assist pump device comprises an inflow tube, which Abbott calls an inflow cannula, which defines the blood inflow path from from the left ventricle of a patient's heart. Also, the inflow cannula includes a suction end which is configured to be inserted into a left ventricle of a patient's heart.

[5] All annotations in black text boxes herein have been added by Plaintiff, to supplement the existing annotations (if any).

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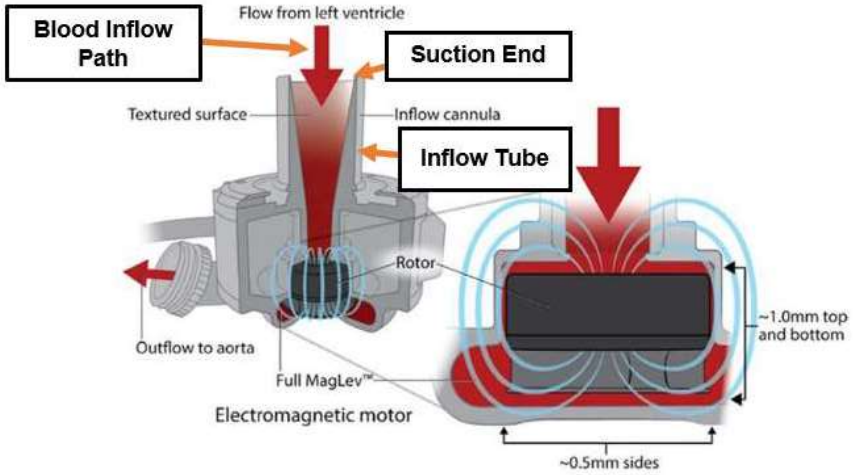
U.S. Patent No. 11,674,517 Claim	Abbott's '517 Accused Products[1]
	 Exemplary Source: Figure 1 from "HeartMate 3 in Lowest INTERMACS Profile Cohort: The Swiss Experience," available at https://www.researchgate.net/publication/317276467_HeartMate_3_in_Lowest_INTERMACS_Profile_Cohort_The_Swiss_Experience. *See also* the evidence and analysis for the Preamble above and the other claim elements discussed herein.

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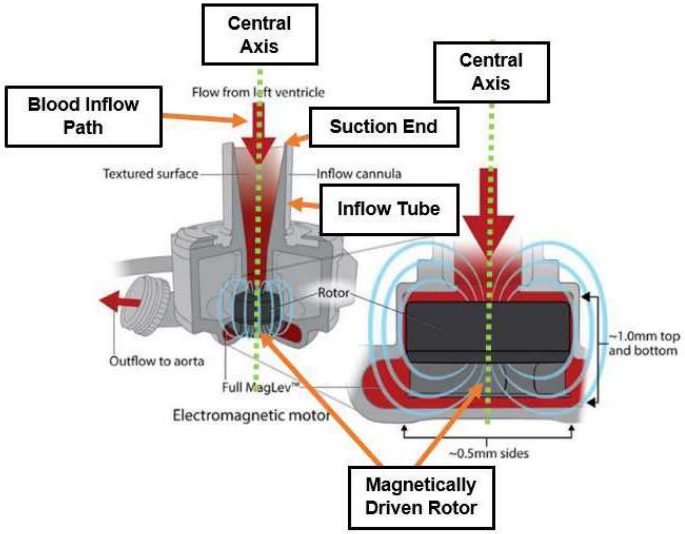
U.S. Patent No. 11,674,517 Claim	Abbott's '517 Accused Products[1]
a magnetically driven rotor axially aligned with the inflow tube and being spaced apart from the suction end when the suction end of the inflow tube is inserted into the ventricle, the magnetically driven rotor being rotatable within a surrounding rotor housing to act upon blood flowing from the inflow tube toward the rotor, the magnetically driven rotor being rotatable about a central axis and being rigidly coupled to and axially adjacent to a first magnetic device that is located within the surrounding rotor housing;	Abbott's '517 Accused Products include a heart assist pump device comprising a magnetically driven rotor axially aligned with the inflow tube and being spaced apart from the suction end when the suction end of the inflow tube is inserted into the ventricle, the magnetically driven rotor being rotatable within a surrounding rotor housing to act upon blood flowing from the inflow tube toward the rotor, the magnetically driven rotor being rotatable about a central axis and being rigidly coupled to and axially adjacent to a first magnetic device that is located within the surrounding rotor housing. For example, as shown in the annotated images below, HeartMate 3's LVAD heart assist pump device comprises a magnetically driven rotor with a central axis that is aligned with the inflow tube, which Abbott calls an inflow cannula. The magnetically driven rotor is also spaced apart from the suction end of the inflow cannula when it it is inserted into the left ventricle of a patient's heart. 

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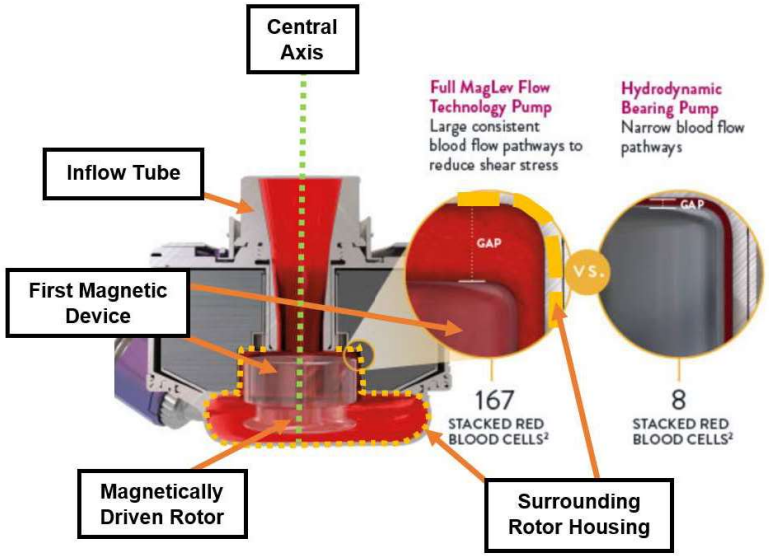
U.S. Patent No. 11,674,517 Claim	Abbott's '517 Accused Products[1]
	Further, the magnetically driven rotor is rotatable within a surrounding rotor housing within the HeartMate 3 LVAD heart assist pump device to act upon blood flowing from the inflow cannula toward the rotor, and is rigidly coupled to a first magnetic device within that surrounding rotor housing.  Exemplary Sources: Figure 1 from "HeartMate 3 in Lowest INTERMACS Profile Cohort: The Swiss Experience," available at https://www.researchgate.net/publication/317276467_HeartMate_3_in_Lowest_INTERMACS_Profile_Cohort_The_Swiss_Experience; HeartMate 3 Website at https://www.cardiovascular.abbott/us/en/hcp/products/heart-failure/left-ventricular-assist-devices/heartmate-3/about.html. *See also* the evidence and analysis for the Preamble above and the other claim elements discussed herein.

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U.S. Patent No. 11,674,517 Claim	Abbott's '517 Accused Products[1]
a second magnetic device axially aligned with the inflow tube and positioned to magnetically drive rotation of the magnetically driven rotor via a magneto coupling with the first magnetic device while being spaced apart and sealed from both the magnetically driven rotor and the first magnetic device by at least one sealing wall, the second magnetic device being positioned axially spaced apart from the magnetically driven rotor;	Abbott's '517 Accused Products include a second magnetic device axially aligned with the inflow tube and positioned to magnetically drive rotation of the magnetically driven rotor via a magneto coupling with the first magnetic device while being spaced apart and sealed from both the magnetically driven rotor and the first magnetic device by at least one sealing wall, the second magnetic device being positioned axially spaced apart from the magnetically driven rotor. For example, the HeartMate 3 heart assist pump device includes a second magnetic device which Abbot calls a Motor, Stator, and/or MagLev Flow technology. This second magnetic device is configured to be axially aligned with the central axis of the magnetically driven rotor, which in turn is axially aligned with the inflow tube. The second magnetic device is positioned to magnetically drive the magnetically driven rotor to rotate via a magneto coupling with the first magnetic device. Further, the second magnetic device is configured to magnetically drive the magnetically driven rotor to rotate while spaced axially apart from the magnetically driven rotor, as well as spaced apart and sealed from the magnetically driven rotor and first magnetic device by at least one sealing wall, such as a sealing wall of the surrounding rotor housing, as shown in the exemplary annotated images below.

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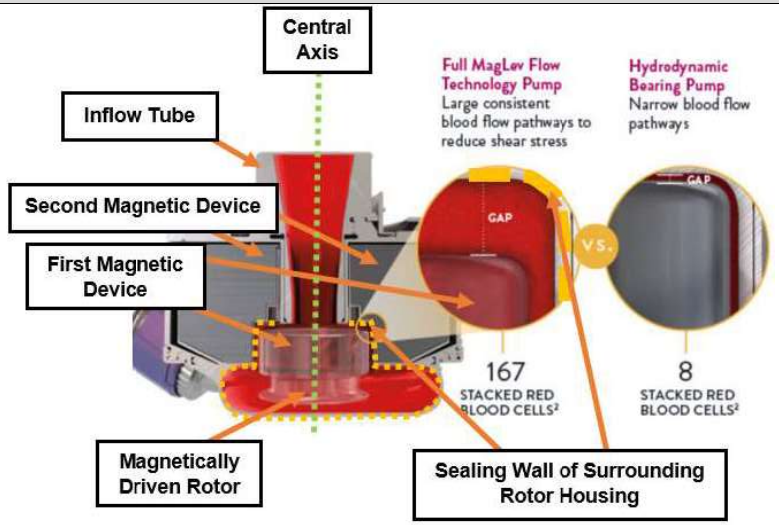
U.S. Patent No. 11,674,517 Claim	Abbott's '517 Accused Products[1]
	 Exemplary Source: HeartMate 3 Website at https://www.cardiovascular.abbott/us/en/hcp/products/heart-failure/left-ventricular-assist-devices/heartmate-3/about.html; *see also* Video titled "HeartMate 3 LVAD Peer-to-Peer Video Presentation" at https://youtu.be/_C-K-DClNbI. *See also* the evidence and analysis for the Preamble above and the other claim elements discussed herein.
a blood outflow port positioned radially adjacent the magnetically driven rotor such that blood driven by the magnetically driven rotor is configured to exit the surrounding rotor housing in a direction transverse to the central axis of the magnetically driven rotor,	Abbott's '517 Accused Products include a blood outflow port positioned radially adjacent the magnetically driven rotor such that blood driven by the magnetically driven rotor is configured to exit the surrounding rotor housing in a direction transverse to the central axis of the magnetically driven rotor. For example, the HeartMate 3 heart assist pump device includes a port for blood outflow to the aorta, as shown in the annotated image below. This port is radially adjacent to the magnetically driven rotor, such that blood

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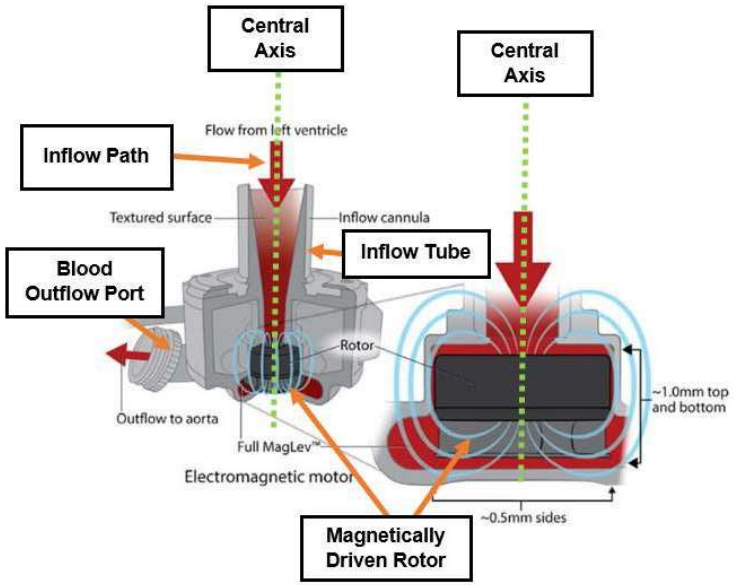
U.S. Patent No. 11,674,517 Claim	Abbott's '517 Accused Products[1]
	driven by the rotor is configured to exit the surrounding housing in a direction transverse to the central axis of the magnetically driven rotor.  Exemplary Source: Figure 1 from "HeartMate 3 in Lowest INTERMACS Profile Cohort: The Swiss Experience," available at https://www.researchgate.net/publication/317276467_HeartMate_3_in_Lowest_INTERMACS_Profile_Cohort_The_Swiss_Experience. *See also* the evidence and analysis for the Preamble above and the other claim elements discussed herein.

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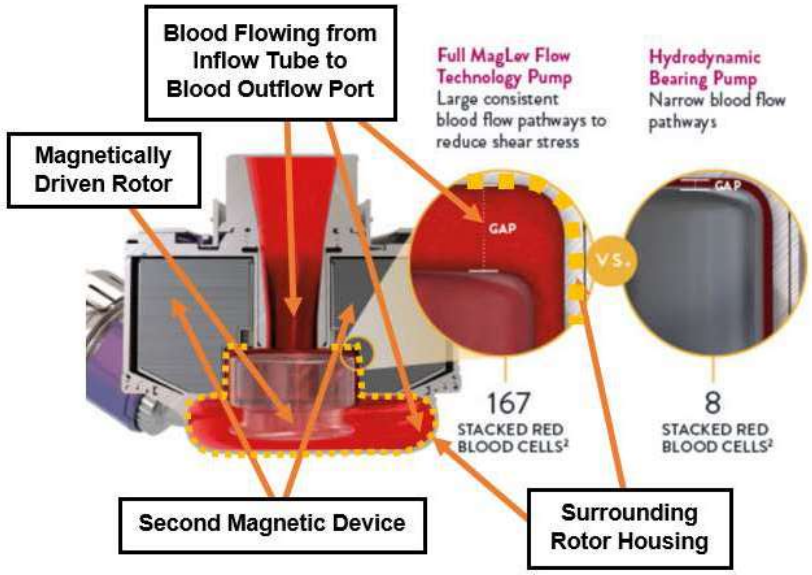
U.S. Patent No. 11,674,517 Claim	Abbott's '517 Accused Products[1]
wherein when the magnetically driven rotor is rotated, the magnetically driven rotor remains adjacent to and spaced apart from the surrounding rotor housing by the blood flowing from the inflow tube and to the blood outflow port; and	When the magnetically driven rotor of Abbott's '517 Accused Products is rotated, the magnetically driven rotor remains adjacent to and spaced apart from the surrounding rotor housing by the blood flowing from the inflow tube and to the blood outflow port.. For example, the second magnetic device of the HeartMate 3 (which Abbott calls a Motor, Stator, and/or MagLev Flow Technology) is configured to orient the magnetically driven rotor in its housing. And the second magnetic device orients the rotor so that when it is rotated, it remains adjacent to and spaced apart from the surrounding rotor housing by the blood flowing from the inflow cannula to the outflow port that leads to the aorta. 

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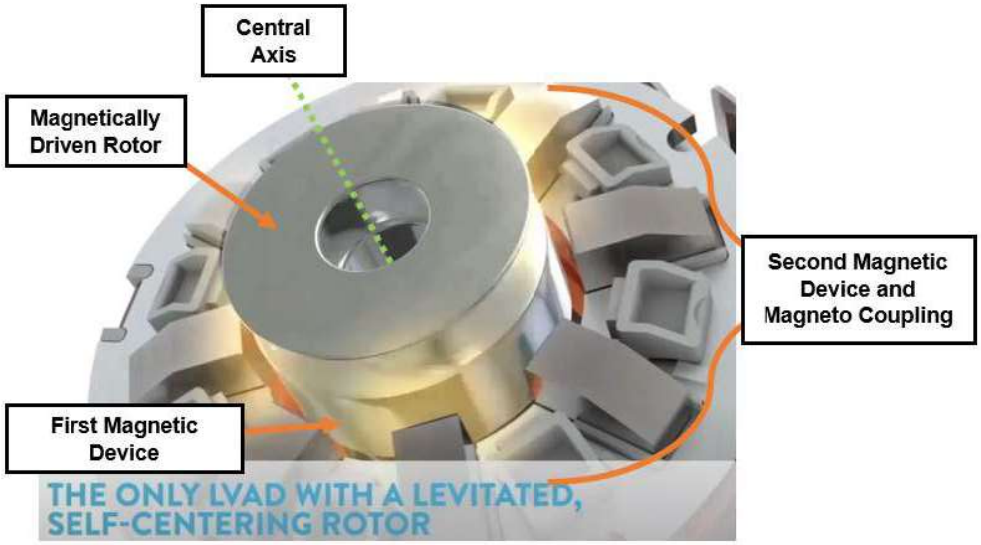
U.S. Patent No. 11,674,517 Claim	Abbott's '517 Accused Products[1]
	 Exemplary Sources: HeartMate 3 Website at https://www.cardiovascular.abbott/us/en/hcp/products/heart-failure/left-ventricular-assist-devices/heartmate-3/about.html; *see also* video titled "Abbott's HeartMate 3 LVAD," available at https://www.youtube.com/watch?app=desktop&v=IbHN8e_OGJw; video titled "HeartMate 3 LVAD Peer-to-Peer Video Presentation" at https://youtu.be/_C-K-DClNbI. *See also* the evidence and analysis for the Preamble above and the other claim elements discussed herein.

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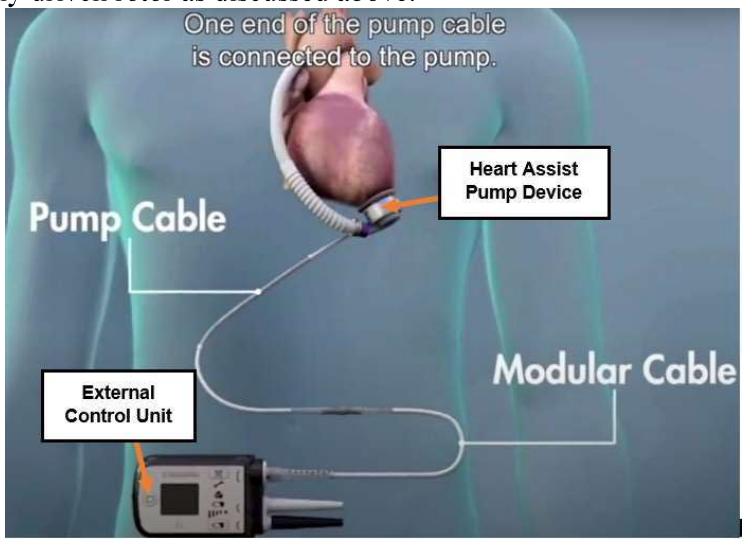
U.S. Patent No. 11,674,517 Claim	Abbott's '517 Accused Products[1]
an external control unit configured to regulate operation of the second magnetic device, wherein the external control unit is connectable to the heart assist pump device for controlling the second magnetic device to thereby magnetically drive the rotation of the magnetically driven rotor via the magneto coupling with the first magnetic device.	Abbott's '517 Accused Products include an external control unit configured to regulate operation of the second magnetic device, wherein the external control unit is connectable to the heart assist pump device for controlling the second magnetic device to thereby magnetically drive the rotation of the magnetically driven rotor via the magneto coupling with the first magnetic device. For example, Abbott's HeartMate 3 products include an external control unit, which Abbott calls the system controller. This external control unit is configured to be connected to the heart assist pump device which Abbott calls the HeartMate 3 LVAD. The external control unit is also configured to regulate the operation of the second magnetic device, which Abbott calls the Motor, Stator, or MagLev Flow technology, to magnetically drive the rotation of the magnetically driven rotor as discussed above.  Exemplary Source: Video titled "HeartMate 3 LVAD Patient Education Program – (2) System Overview," available at https://www.youtube.com/watch?v=hmmpIKzmKe0; *see also* "HeartMate 3™ Left Ventricular Assist System Instructions for Use" at pages marked "1-3" and "1-10" - available for download at https://manuals.sjm.com/Search-Form?re=North-

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	America&cc=US&ln=EN&ct=professional&qry=heartmate&ipp=10 via https://manuals.sjm.com/~/media/manuals/product-manual-pdfs/5/7/571a1818-2da2-4c1a-b454-f6f5a3bc39b6.pdf. *See also* the evidence and analysis for the Preamble above and the other claim elements discussed herein.