

Chart of Petitioner’s Reliance on Pleadings from Parallel Litigation for Claim Construction

Citation	Quotation from Petition or Supporting Declaration
Paper 1 (“Pet.”) at 23	In Parallel Litigation, PO asserts that a magnetic element sealed within a rotor is “ <i>rigidly coupled</i> .” Ex.1019, 5–6.
Pet. at 25	In Parallel Litigation, PO asserts that a magnetic element sealed within a rotor is “ <i>axially adjacent</i> .” Ex.1019, 5–6. Assuming that interpretation...
Pet. at 28	In Parallel Litigation, PO asserts that a “motor and/or stator” is “ <i>a second magnetic device</i> .” Ex.1019, 7–8 (cleaned up). Assuming that interpretation...
Pet. at 29–30	In Parallel Litigation, PO alleges that a “stator” satisfies this limitation. Ex.1019, 7–8. Assuming that interpretation...
Pet. at 41–42	In Parallel Litigation, PO asserts that a magnetic element sealed within a rotor is positioned between the second magnetic device and the magnetically driven rotor. <i>See</i> Ex.1019. Assuming that interpretation...
Pet. at 45	In Parallel Litigation, PO asserts that a pump device with an inflow cannula <i>is a catheter device</i> . Ex.1019, 4. Assuming that interpretation...
Pet. at 61–62	In Parallel Litigation, PO asserts that a similar arrangement of an impeller and magnetic elements satisfies this limitation. Ex.1019, 5–6. Accordingly...
Pet. at 65–66	In Parallel Litigation, PO alleges that a “stator” design satisfies this limitation. Ex.1019, 7–8. Assuming that interpretation...

Citation	Quotation from Petition or Supporting Declaration
Pet. at 71	In Parallel Litigation, PO asserts that a magnetic bearing (i.e., “MagLev”) satisfies this limitation. Ex.1019, 10. Assuming that interpretation...
Pet. at 77	In Parallel Litigation, PO asserts that a fixed speed or lower speed limit (e.g. output as measured in liters of blood per minute) are “ <i>control value[s] ...indicative of defined cardiac output.</i> ” Ex.1019, 12. Assuming that interpretation...
Pet. at 78	In Parallel Litigation, PO asserts that a pump device with an inflow cannula <i>is a catheter device.</i> Assuming that interpretation...
Pet. at 104	In Parallel Litigation, PO asserts that a magnetic bearing (i.e., “MagLev”) satisfies this limitation. Ex.1019, 10–11. Assuming that interpretation...
Pet. at 112	In Parallel Litigation, PO asserts that a fixed speed or lower speed limit are “ <i>control value[s] ...indicative of a defined cardiac output.</i> ” Assuming that interpretation...
Pet. at 112	In Parallel Litigation, PO asserts that a pump device with an inflow cannula <i>is a catheter device.</i> Assuming that interpretation...
Pet. at 141	In Parallel Litigation, PO asserts that a pump device with an inflow cannula “ <i>is a catheter device.</i> ” Assuming that interpretation...
Ex. 1003 (“Crosby”) at 90 (¶ 153)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that assumes “a heart assist pump device deliverable to the heart” includes “an inflow cannula...inserted into a left ventricle of a patient’s heart.” See Ex.1019, at pp. 3–4 (Complaint, Ex. 12). For the purposes of my analysis, I adopt that construction of “delivering a heart assist pump device to the heart.”

Citation	Quotation from Petition or Supporting Declaration
Crosby at 94–95 (¶ 160)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that maps the impeller portion of the “rotor” of the “HeartMate 3” to the “magnetically driven rotor” element recited in Claim 1. Ex.1019, at pp. 5–6 (Complaint, Ex. 12). For the purposes of my analysis, I map the limitation of a “magnetically driven rotor” to the “impeller 74” of the embodiment of the rotor 17 described in Figure 11 of Wampler-169 in the same way.
Crosby at 119 (¶ 209)	[F]or the purposes of my analysis in this Ground, I assume that the Patent Owner’s apparent broader construction (in parallel litigation) of “magneto coupling” to also include not only a transfer of torque from one rotating magnetic component to another rotating magnetic component, but also to include “a transfer of torque from one <i>stationary</i> magnetic component (i.e., a stator) to another rotating magnetic component using an <i>electromagnetic field</i> ,” is correct. <i>See</i> Ex.1019.
Crosby at 130 (¶ 225)	I note that in parallel litigation, the Patent Owner has asserted that the blood outflow port of the “HeartMate 3” is “radially adjacent” to a magnetically driven rotor in the same way as described above in Wampler-169. <i>See</i> Ex.1019, at pp. 8–9 (Complaint, Ex. 12). For the purposes of my analysis, I also map the limitation that the blood outflow port (e.g., “discharge tube 16”) is “radially adjacent” to the magnetically driven rotor (e.g., the “impeller 74”) in the same way.
Crosby at 156–157 (¶ 284)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that the Heartmate 3 external control unit is configured to control the operation of the second magnetic device using a control value that is indicative of cardiac output, such as what Abbott calls a “fixed speed” or “lower speed limit,” which is indicative of a defined cardiac output (e.g. output as measured in liters of blood per minute. <i>See, e.g.,</i> Ex.1019, (Complaint, Ex.12). For the purposes of my analysis, I adopt that construction of “control value is indicative of a defined cardiac output.”

Citation	Quotation from Petition or Supporting Declaration
Crosby at 159–160 (¶ 293)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that the Heartmate 3 heart assist pump device is a catheter device because it includes a catheter, which Abbott calls an Inflow Cannula. <i>See, e.g.</i> , Ex.1019 (Complaint, Ex.12). For the purposes of my analysis, I adopt that construction of “catheter device.”
Crosby at 162 (¶ 303)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that assumes “a heart assist pump device deliverable to the heart” includes “an inflow cannula...inserted into a left ventricle of a patient’s heart.” <i>See</i> Ex.1019, at pp. 3 (Complaint, Ex.12). For the purposes of my analysis, I adopt that construction of “a heart assist pump device deliverable to the heart.”
Crosby at 169 (¶ 319)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that maps the impeller portion of the “rotor” of the “HeartMate 3” to the “magnetically driven rotor” element recited in Claim 21. Ex.1019, at pp. 5 (Complaint, Ex.12). For the purposes of my analysis, I map the limitation of a “magnetically driven rotor” to the “impeller 74” of the embodiment of the rotor 17 described in Figure 11 of Wampler-169 in the same way.
Crosby at 196 (¶ 367)	[F]or the purposes of my analysis in this Ground, I assume that the Patent Owner’s apparent broader construction (in parallel litigation) of “magneto coupling” to also include not only a transfer of torque from one rotating magnetic component to another rotating magnetic component, but also to include “a transfer of torque from one <i>stationary</i> magnetic component (i.e., a stator) to another rotating magnetic component using an <i>electromagnetic</i> field,” is correct. <i>See</i> Ex.1019.

Citation	Quotation from Petition or Supporting Declaration
Crosby at 202 (¶ 377)	I note that in parallel litigation, the Patent Owner has asserted that the blood outflow port of the “HeartMate 3” is radially outward of a magnetically driven rotor in the same way as described above in Wampler-169. <i>See</i> Ex.1019, at pp. 8–9 (Complaint, Ex.12). For the purposes of my analysis, I also map the limitation that the blood outflow port (e.g., “discharge tube 16”) is “radially outward” of the magnetically driven rotor (e.g., the “impeller 74”) in the same way.
Crosby at 211 (¶ 396)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that the Heartmate 3 external control unit is configured to control the operation of the second magnetic device using a control value, such as what Abbott calls a “fixed speed” or “lower speed limit” which is indicative of defined cardiac output (e.g. output as measured in liters of blood per minute. <i>See, e.g.,</i> Ex.1019, (Complaint, Ex.12). For the purposes of my analysis, I adopt that construction of “control value indicative of a defined cardiac output.”
Crosby at 229–230 (¶ 453)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that the Heartmate 3 heart assist pump device is a catheter device because it includes a catheter, which Abbott calls an Inflow Cannula. <i>See, e.g.,</i> Ex.1019 (Complaint, Ex.12). For the purposes of my analysis, I adopt that construction of “catheter device.”
Crosby at 233 (¶ 461)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that assumes “a heart assist pump device deliverable to the heart” includes “an inflow cannula...inserted into a left ventricle of a patient’s heart.” <i>See</i> Ex.1019, at pp. 3 (Complaint, Ex.12). For the purposes of my analysis, I adopt that construction of “a heart assist pump device deliverable to the heart.”

Citation	Quotation from Petition or Supporting Declaration
Crosby at 237–238 (¶ 468)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that maps the impeller portion of the “rotor” of the “HeartMate 3” to the “magnetically driven rotor” element recited in Claim 1. Ex.1019, at pp. 5 (Complaint, Ex.12). For the purposes of my analysis, I map the limitation of a “magnetically driven rotor” to the “impeller” portion of the rotor described in Bourque-2001 in the same way.
Crosby at 259 (¶ 511)	[F]or the purposes of my analysis in this Ground, I assume that the Patent Owner’s apparent broader construction (in parallel litigation) of “magneto coupling” to also include not only a transfer of torque from one rotating magnetic component to another rotating magnetic component, but also to include “a transfer of torque from one <i>stationary</i> magnetic component (i.e., a stator) to another rotating magnetic component using an <i>electromagnetic field</i> ,” is correct. <i>See</i> Ex.1019.
Crosby at 267–268 (¶ 525)	I note that in parallel litigation, the Patent Owner has asserted that the blood outflow port of the “HeartMate 3” is “radially adjacent” to a magnetically driven rotor in the same way as described above in Bourque-2001. <i>See</i> Ex.1019, at pp. 8–9 (Complaint, Ex.12). For the purposes of my analysis, I also map the limitation that the blood outflow port (e.g., “outflow channel”) is “radially adjacent” to the magnetically driven rotor (e.g., the “impeller” of the rotor) in the same way.
Crosby at 270–271 (¶ 530)	[F]or the purposes of my analysis in this Ground, I assume that the Patent Owner’s apparent broader construction (in parallel litigation) of “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” to include not only hydrodynamic suspension of the rotor but also that it may be met by <i>exclusively</i> magnetic suspension, is correct. <i>See</i> Ex.1019.

Citation	Quotation from Petition or Supporting Declaration
Crosby at 289 (¶ 575)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that the Heartmate 3 external control unit is configured to control the operation of the second magnetic device using a control value that is indicative of cardiac output, such as what Abbott calls a “fixed speed” or “lower speed limit,” which is indicative of a defined cardiac output (e.g. output as measured in liters of blood per minute. <i>See, e.g.</i> , Ex.1019, Complaint, Ex.12. For the purposes of my analysis, I adopt that construction of “control value is indicative of a defined cardiac output.”
Crosby at 293 (¶ 585)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that the Heartmate 3 heart assist pump device is a catheter device because it includes a catheter, which Abbott calls an Inflow Cannula. <i>See, e.g.</i> , Ex.1019 (Complaint, Ex.12). For the purposes of my analysis, I adopt that construction of “catheter device.”
Crosby at 297 (¶ 596)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that assumes “a heart assist pump device deliverable to the heart” includes “an inflow cannula...inserted into a left ventricle of a patient’s heart.” <i>See</i> Ex.1019, at pp. 3 (Complaint, Ex.12). For the purposes of my analysis, I adopt that construction of “a heart assist pump device deliverable to the heart.”
Crosby at 303 (¶ 608)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that maps the impeller portion of the “rotor” of the “HeartMate 3” to the “magnetically driven rotor” element recited in Claim 21. Ex.1019, at pp. 5 (Complaint, Ex.12). For the purposes of my analysis, I map the limitation of a “magnetically driven rotor” to the “impeller” portion of the rotor described in Bourque-2001 in the same way.

Citation	Quotation from Petition or Supporting Declaration
Crosby at 324–325 (¶ 650)	[F]or the purposes of my analysis in this Ground, I assume that the Patent Owner’s apparent broader construction (in parallel litigation) of “magneto coupling” to also include not only a transfer of torque from one rotating magnetic component to another rotating magnetic component, but also to include “a transfer of torque from one <i>stationary</i> magnetic component (i.e., a stator) to another rotating magnetic component using an <i>electromagnetic field</i> ,” is correct. <i>See</i> Ex.1019.
Crosby at 329 (¶ 658)	I note that in parallel litigation, the Patent Owner has asserted that the blood outflow port of the “HeartMate 3” is “radially adjacent” to (or radially outward of) a magnetically driven rotor in the same way as described above in Bourque-2001. <i>See</i> Ex.1019, at pp. 8–9 (Complaint, Ex.12). For the purposes of my analysis, I also map the limitation that the blood outflow port (e.g., “outflow channel”) is “radially outward” of the magnetically driven rotor (e.g., the “impeller” of the rotor) in the same way.
Crosby at 331–332 (¶ 664)	[F]or the purposes of my analysis in this Ground, I assume that the Patent Owner’s apparent broader construction (in parallel litigation) of “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” to include not only hydrodynamic suspension of the rotor but also that it may be met by <i>exclusively</i> magnetic suspension, is correct. <i>See</i> Ex.1019.
Crosby at 335–336 (¶ 673)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that the Heartmate 3 external control unit is configured to control the operation of the second magnetic device using a control value, such as what Abbott calls a “fixed speed” or “lower speed limit” which is indicative of cardiac output (e.g. output as measured in liters of blood per minute. <i>See, e.g.,</i> Ex.1019, Complaint, Ex.12. For the purposes of my analysis, I adopt that construction of “a control value indicative of a defined cardiac output.”

Citation	Quotation from Petition or Supporting Declaration
Crosby at 354 (¶ 732)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that the Heartmate 3 heart assist pump device is a catheter device because it includes a catheter, which Abbott calls an Inflow Cannula. <i>See, e.g.</i> , Ex.1019 (Complaint, Ex.12). For the purposes of my analysis, I adopt that construction of “catheter device.”
Crosby at 374 (¶ 760)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that assumes “a heart assist pump device deliverable to the heart” includes “an inflow cannula...inserted into a left ventricle of a patient’s heart.” <i>See</i> Ex.1019, at pp. 3 (Complaint, Ex.12). For the purposes of my analysis, I adopt that construction of “a heart assist pump device deliverable to the heart.”
Crosby at 377–378 (¶ 767)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that maps the impeller portion of the “rotor” of the “HeartMate 3” to the “magnetically driven rotor” element recited in Claim 1. <i>See</i> Ex.1019, at pp. 5 (Complaint, Ex.12). For the purposes of my analysis, I map the limitation of a “magnetically driven rotor” to the “impeller” described in Akamatsu-1999 in the same way.
Crosby at 404 (¶ 827)	I note that in parallel litigation, the Patent Owner has asserted that the blood outflow port of the “HeartMate 3” is “radially adjacent” to a magnetically driven rotor in the same way as described above in Akamatsu-1999. <i>See</i> Ex.1019, at pp. 8–9 (Complaint, Ex.7). For the purposes of my analysis, I also map the limitation that the blood outflow port (e.g., “outflow conduit”) is “radially adjacent” to the magnetically driven rotor (e.g., the “impeller”) in the same way.

Citation	Quotation from Petition or Supporting Declaration
Crosby at 409–410 (¶ 836)	[F]or the purposes of my analysis in this Ground, I assume that the Patent Owner’s apparent broader construction (in parallel litigation) of “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” to include not only hydrodynamic suspension of the rotor but also that it may be met by <i>exclusively</i> magnetic suspension, is correct. <i>See</i> Ex.1019.
Crosby at 428 (¶ 882)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that the Heartmate 3 external control unit is configured to control the operation of the second magnetic device using a control value that is indicative of cardiac output, such as what Abbott calls a “fixed speed” or “lower speed limit” which is indicative of cardiac output (e.g. output as measured in liters of blood per minute. <i>See, e.g.,</i> Ex.1019 (Complaint, Ex.12). For the purposes of my analysis, I adopt that construction of “control value is indicative of a defined cardiac output.”
Crosby at 430 (¶ 891)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that the Heartmate 3 heart assist pump device is a catheter device because it includes a catheter, which Abbott calls an Inflow Cannula. <i>See, e.g.,</i> Ex.1019, Complaint, Ex.12. For the purposes of my analysis, I adopt that construction of “catheter device.”
Crosby at 434 (¶ 901)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that assumes “a heart assist pump device deliverable to the heart” includes “an inflow cannula...inserted into a left ventricle of a patient’s heart.” <i>See</i> Ex.1019, at pp. 3 (Complaint, Ex.12). For the purposes of my analysis, I adopt that construction of “a heart assist pump device deliverable to the heart.”

Citation	Quotation from Petition or Supporting Declaration
Crosby at 441 (¶ 915)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that maps the impeller portion of the “rotor” of the “HeartMate 3” to the “magnetically driven rotor” element recited in Claim 21. <i>See</i> Ex.1019, at pp. 5 (Complaint, Ex.12). For the purposes of my analysis, I map the limitation of a “magnetically driven rotor” to the “impeller” described in Akamatsu-1999 in the same way.
Crosby at 458–459 (¶ 954)	For the purposes of my analysis in this Ground, I assume that my narrower interpretation of the plain and ordinary meaning is correct, and Patent Owner’s apparent broader construction (in parallel litigation) of “magneto coupling” to also include not only a transfer of torque from one rotating magnetic component to another rotating magnetic component, but also to include “a transfer of torque from one <i>stationary</i> magnetic component (i.e., a stator) to another rotating magnetic component using an <i>electromagnetic</i> field,” is incorrect. <i>See</i> Ex.1019.
Crosby at 462 (¶ 963)	I note that in parallel litigation, the Patent Owner has asserted that the blood outflow port of the “HeartMate 3” is “radially adjacent” to or “radially outward” of a magnetically driven rotor in the same way as described above in Akamatsu-1999. <i>See</i> Ex.1019, at pp. 8–9 (Complaint, Ex.12). For the purposes of my analysis, I also map the limitation that the blood outflow port (e.g., “outflow conduit”) is “radially outward” of the magnetically driven rotor (e.g., the “impeller”) in the same way.
Crosby at 467–468 (¶ 973)	[F]or the purposes of my analysis in this Ground, I assume that the Patent Owner’s apparent broader construction (in parallel litigation) of “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” to include not only hydrodynamic suspension of the rotor but also that it may be met by <i>exclusively</i> magnetic suspension, is correct. <i>See</i> Ex.1019

Citation	Quotation from Petition or Supporting Declaration
Crosby at 472 (¶ 983)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that the Heartmate 3 external control unit is configured to control the operation of the second magnetic device using a control value, such as what Abbott calls a “fixed speed” or “lower speed limit” which is a control value indicative of a defined cardiac output. (e.g. output as measured in liters of blood per minute. <i>See, e.g.</i> , Ex.1019 (Complaint, Ex.12). For the purposes of my analysis, I adopt that construction of “a control value indicative of a defined cardiac output.”
Crosby at 491 (¶ 1039)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that the Heartmate 3 heart assist pump device is a catheter device because it includes a catheter, which Abbott calls an Inflow Cannula. <i>See, e.g.</i> , Ex.1019, Complaint, Ex.12. For the purposes of my analysis, I adopt that construction of “catheter device.”
Crosby at 494 (¶ 1047)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that assumes “a heart assist pump device deliverable to the heart” includes “an inflow cannula...inserted into a left ventricle of a patient’s heart.” <i>See</i> Ex.1019, at pp. 3 (Complaint, Ex.12). For the purposes of my analysis, I adopt that construction of “a heart assist pump device deliverable to the heart.”
Crosby at 528–529 (¶ 1121)	I note that in parallel litigation, the Patent Owner has asserted that the blood outflow port of the “HeartMate 3” is “ <i>radially adjacent</i> ” to a magnetically driven rotor in the same way as described above in Schima. <i>See</i> Ex.1019, at pp. 8–9 (Complaint, Ex.12). For the purposes of my analysis, I also map the limitation that the blood outflow port (e.g., “outlet 14”) is “ <i>radially adjacent</i> ” to the magnetically driven rotor (e.g., the “rotor 1”) in the same way.

Citation	Quotation from Petition or Supporting Declaration
Crosby at 549–550 (¶ 1167)	In parallel litigation, however, I have been informed the Patent Owner has asserted a theory of infringement that the Heartmate 3 external control unit is configured to control the operation of the second magnetic device using a control value that is indicative of cardiac output, such as what Abbott calls a fixed speed or lower speed limit which is indicative of cardiac output (e.g. output as measured in liters of blood per minute. <i>See, e.g.,</i> Ex.1019 (Complaint, Ex.12). For the purposes of my analysis, I adopt that construction of “ <i>control value is indicative of cardiac output.</i> ”
Crosby at 553–554 (¶ 1176)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that the Heartmate 3 heart assist pump device is a catheter device because it includes a catheter, which Abbott calls an Inflow Cannula. <i>See, e.g.,</i> Ex.1019 (Complaint, Ex.12). For the purposes of my analysis, I adopt that construction of “catheter device.”
Crosby at 556 (¶ 1187)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that assumes “a heart assist pump device deliverable to the heart” includes “an inflow cannula...inserted into a left ventricle of a patient’s heart.” <i>See</i> Ex.1019, at pp. 3 (Complaint, Ex.12). For the purposes of my analysis, I adopt that construction of “a heart assist pump device deliverable to the heart.”
Crosby at 587–588 (¶ 1259)	I note that in parallel litigation, the Patent Owner has asserted that the blood outflow port of the “HeartMate 3” is “radially adjacent” to, or radially outward of, a magnetically driven rotor in the same way as described above in Schima. <i>See</i> Ex.1019, at pp. 8–9 (Complaint, Ex.12). For the purposes of my analysis, I also map the limitation that the blood outflow port (e.g., “outlet 14”) is radially outward of the magnetically driven rotor (e.g., the “rotor 1”) in the same way.

Citation	Quotation from Petition or Supporting Declaration
Crosby at 595 (¶ 1274)	In parallel litigation, however, I have been informed the Patent Owner has asserted a theory of infringement that the Heartmate 3 external control unit is configured to control the operation of the second magnetic device using a measurement value that is indicative of cardiac output, such as what Abbott calls a fixed speed or lower speed limit which is a control value indicative of a defined cardiac output (e.g. output as measured in liters of blood per minute. <i>See, e.g.,</i> Ex.1019 (Complaint, Ex.12). For the purposes of my analysis, I adopt that construction of “ <i>a control value indicative of a defined cardiac output.</i> ”
Crosby at 613 (¶ 1331)	I have been informed that in parallel litigation, the Patent Owner has asserted a theory of infringement that the Heartmate 3 heart assist pump device is a catheter device because it includes a catheter, which Abbott calls an Inflow Cannula. <i>See, e.g.,</i> Ex.1019 (Complaint, Ex.12). For the purposes of my analysis, I adopt that construction of “catheter device.”