

Bozzo, Brian P.

From: Ryan Hering <Ryan_Hering@txwd.uscourts.gov>
Sent: Thursday, February 20, 2025 12:02 PM
To: Mark Siegmund; GRC-Midas@gtlaw.com; Michael.Smith@Solidcounsel.com; bkolegraff@twtlaw.com; MIDAS-GRC; jthomas@twtlaw.com; gthomas@twtlaw.com; Ashley.Moore@gtlaw.com; Pogorzelski, Henry M.; Joe.Shaneyfelt@gtlaw.com
Cc: Kristie Davis; Jennifer Clark; Lily Reznik
Subject: Court's Preliminary Constructions- Midas Green Technologies, LLC v. Green Revolution Cooling, Inc., No. 6:24-cv-00166 - Markman

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Counsel,

Please see the Court's preliminary constructions for tomorrow's *Markman*. Please let the Court know which terms the parties intend to argue tomorrow in light of these constructions. Also, please send any slides to be used at tomorrow's hearing to kristie_davis@txwd.uscourts.gov and lily_reznik@txwd.uscourts.gov. As a reminder, the Court will also rule on the discovery dispute chart at the conclusion of the *Markman*.

Thanks,
Ryan

ONE AGREED TERM FOR US PATENT 10,405,457

AGREED TERM (claims 1 & 6)	AGREED CONSTRUCTION
"plenum"	<i>"a structure for dispensing liquid"</i>

THE THREE DISPUTED TERMS FOR US PATENT 10,405,457

DISPUTED TERM 1 (claims 1 & 6)	MIDAS PROPOSAL	GRC PROPOSAL	Court's Preliminary Construction
"weir"	<i>"an overflow structure or barrier that a liquid flows over"</i>	<i>"an overflow structure or barrier that determines the level of liquid"</i>	<i>"an overflow structure or barrier that a liquid flows over"</i>

Based upon the parties' representations, it is the Courts understanding that the parties no longer request a construction of the previously-contested claim term 'a weir, integrated horizontally into the long wall of the tank' (claims 1, 6).

DISPUTED TERM 3 (claims 1 & 6)	MIDAS PROPOSAL	GRC PROPOSAL	Court's Preliminary Construction
"a dielectric fluid recovery reservoir . . . adapted to receive the dielectric fluid as it flows over the weir"	<i>Plain Meaning</i>	<i>"the dielectric fluid is received by the recovery reservoir as soon as the fluid flows over the weir"</i>	<i>Plain Meaning</i>

DISPUTED TERM 4 (claim 2)	MIDAS PROPOSAL	GRC PROPOSAL	Court's Preliminary
"the tank and primary circulation facility comprise a highly-integrated module"	Not indefinite pursuant to 35 USC § 112	Indefinite pursuant to 35 USC § 112	Not indefinite

Thanks,
Ryan



Ryan Hering
Law Clerk to the
Hon. Alan D Albright
U.S. District Court
Western District of Texas
Office: **254-750-1522**

From: Ryan Hering
Sent: Wednesday, February 19, 2025 3:25 PM
To: Mark Siegmund <MSiegmund@CJSJLAW.com>
Cc: GRC-Midas@gtlaw.com; MIDAS-GRC@klgates.com; Michael.Smith@Solidcounsel.com; jthomas@twtlaw.com; bkolegraff@twtlaw.com; gthomas@twtlaw.com; Ashley.Moore@gtlaw.com; Henry.Pogorzelski@klgates.com; Joe.Shaneyfelt@gtlaw.com; Kristie Davis <Kristie_Davis@txwd.uscourts.gov>; Jennifer Clark <Jennifer_Clark@txwd.uscourts.gov>
Subject: RE: Midas Green Technologies, LLC v. Green Revolution Cooling, Inc., No. 6:24-cv-00166 - Markman

Counsel,

The Markman in this case will be moved earlier in the day this Friday to accommodate the Court's schedule. The Markman will now begin at **10:00 AM on February 21st** via Zoom. The Court will issue its preliminary constructions tomorrow.

Please join the Zoom using the zoom link below:

Join ZoomGov Meeting

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Thanks,
Ryan

From: Ryan Hering

Sent: Tuesday, February 18, 2025 4:07 PM

To: Mark Siegmund <MSiegmund@CJSJLAW.com>

Cc: GRC-Midas@gtlaw.com; MIDAS-GRC@klgates.com; Michael.Smith@Solidcounsel.com; jthomas@twtlaw.com; bkolegraff@twtlaw.com; gthomas@twtlaw.com; Ashley.Moore@gtlaw.com; Henry.Pogorzelski@klgates.com; Joe.Shaneyfelt@gtlaw.com

Subject: RE: Midas Green Technologies, LLC v. Green Revolution Cooling, Inc., No. 6:24-cv-00166 - Discovery Dispute

Counsel,

The Court will grant the parties a hearing on the discovery dispute at the conclusion of the 2/21/2025 *Markman* hearing.

Thanks,
Ryan



Ryan Hering
Law Clerk to the
Hon. Alan D Albright
U.S. District Court
Western District of Texas
Office: **254-750-1522**

From: Mark Siegmund <MSiegmund@CJSJLAW.com>

Sent: Tuesday, February 11, 2025 5:43 PM

To: TXWDml_Law Clerks WA Judge Albright & Gilliland
<TXWDml_LawClerks_WA_JudgeAlbright&Gilliland@txwd.uscourts.gov>

Cc: GRC-Midas@gtlaw.com; MIDAS-GRC@klgates.com; Michael.Smith@Solidcounsel.com; jthomas@twtlaw.com; bkolegraff@twtlaw.com; gthomas@twtlaw.com; Ashley.Moore@gtlaw.com; Henry.Pogorzelski@klgates.com; Joe.Shaneyfelt@gtlaw.com

Subject: Midas Green Technologies, LLC v. Green Revolution Cooling, Inc., No. 6:24-cv-00166 - Discovery Dispute

CAUTION - EXTERNAL:

Dear Law Clerks,

The parties in the above case request the Court's assistance in resolving the attached discovery dispute. Midas respectfully requests a hearing on the issue and Midas does not expect to display confidential information at the hearing. Please let us know if the Court needs anything else and thank you for your time and consideration.

Sincerely,
Mark

MARK SIEGMUND

PARTNER

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