

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

STRATASYS, INC.,

Plaintiff,

v.

SHENZHEN TUOZHU TECHNOLOGY CO.,
LTD., SHANGHAI LUNKUO TECHNOLOGY
CO., LTD., BAMBU LAB LIMITED, AND
TUOZHU TECHNOLOGY LIMITED,

Defendants.

Civil Action No. 2:24-cv-00644-JRG
LEAD CASE

Civil Action No. 2:24-cv-00645-JRG
MEMBER CASE

JURY TRIAL DEMANDED

**BAMBU’S P.R. 4-2 LIST OF PRELIMINARY
CLAIM CONSTRUCTIONS AND EXTRINSIC EVIDENCE**

Defendants Shenzhen Tuozhu Technology Co., Ltd., Shanghai Lunkuo Technology Co., Ltd., Bambu Lab Limited, and Tuozhu Technology Limited (collectively, “Bambu”) hereby provide preliminary proposed claim constructions for the claim terms, phrases, or clauses contained in the asserted claims of U.S. Patent Nos. 9,168,698 (the “’698 Patent”); 10,556,381 (the “’381 Patent”); 10,569,466 (the “’466 Patent”); 11,167,464 (the “’464 Patent”); 8,562,324 (the “’324 Patent”); 8,747,097 (the “’097 Patent”); 9,421,713 (the “’713 Patent”); 7,555,357 (the “’357 Patent”); 9,592,660 (the “’660 Patent”); and 11,886,774 (the “’774 Patent”) (collectively “the Patents-in-Suit”). Bambu is prepared to meet and confer with StratasyS at a mutually agreeable time to narrow the disputes and to facilitate the preparation of the Joint Claim Construction and Prehearing Statement.

Bambu reserves the right to modify or supplement these P.R. 4-2 disclosures to facilitate agreement with StratasyS to avoid duplication of terms or phrases, or to reflect newly received

information. Furthermore, Bambu reserves the right to modify or supplement these preliminary proposed constructions once it has had an opportunity to review Stratasys's preliminary proposed constructions. Bambu further reserves the right to supplement this disclosure or otherwise rely on additional evidence or expert testimony in support of its preliminary constructions, including but not limited to offering evidence and/or testimony to rebut evidence or testimony proffered by Stratasys. Bambu further reserves the right to rely on any extrinsic evidence disclosed or relied upon by Stratasys.

Bambu's list of proposed terms and claim elements for construction as well as these preliminary claim constructions and identification of extrinsic evidence were prepared in response to Stratasys's infringement contentions. Bambu specifically reserves the right to modify the terms and proposed constructions identified below within a reasonable time period of receiving any supplemental contentions from Stratasys. Bambu reserves the right to offer evidence and argument regarding the construction of any term that is identified by Stratasys.

This list is preliminary and Bambu reserves the right to add, delete, and/or amend claim terms, phrases, and/or clauses from the list based on, without limitation, the list propounded by Stratasys or any information subsequently learned.

I. United States Patent No. 9,168,698

Term	Claim(s)	Proposed Construction	Extrinsic Evidence
“feed rate”	3, 9	No construction necessary	

II. United States Patent No. 10,556,381

Term	Claim(s)	Proposed Construction	Extrinsic Evidence
“extruder”	1	No construction necessary	
“are collectively”	1	No construction necessary	

III. United States Patent No. 10,569,466

Term	Claim(s)	Proposed Construction	Extrinsic Evidence
“Providing a three-dimensional printer that includes a tag sensor “	1	Providing a three-dimensional printer with an integrated tag sensor	• ’464 Patent, cls. 1, 12, 19 • U.S. Patent No. 9,233,504, cl. 1 (BAMBU-00189807)
“receiving one or more operational parameters from the client selected for use in	1	receiving one or more operational parameters from the client automatically selected for use	• Patent Application No. 14/064,974, 2015-07-10 Response to Office Action at 6. (BAMBU-00189138)

Term	Claim(s)	Proposed Construction	Extrinsic Evidence
controlling operation of the three-dimensional printer”			
“providing a three-dimensional printer that includes a controller and a tag sensor;”	19	Providing a three-dimensional printer that includes a controller and an integrated tag sensor	• ’464 Patent, cls. 1, 12, 19 • U.S. Patent No. 9,233,504, cl. 1 (BAMBU-00189807)
“determining an operational parameter for configuring the three-dimensional printer”	19	automatically determining an operational parameter	• Patent Application No. 14/064,974, 2015-07-10 Response to Office Action at 6. (BAMBU-00189138)

IV. United States Patent No. 11,167,464

Term	Claim(s)	Proposed Construction	Extrinsic Evidence
“Determining an operational parameter”	1	Automatically determining an operational parameter	• Patent Application No. 14/064,974, 2015-07-10 Response to Office Action at 6. (BAMBU-00189138)
“a processor configured to determine an operational parameter”	19	A processor configured to automatically determine an operational parameter	• Patent Application No. 14/064,974, 2015-07-10 Response to Office Action at 6. (BAMBU-00189138)

V. United States Patent No. 8,562,324

Term	Claim(s)	Proposed Construction	Extrinsic Evidence
“three-dimensional model”	1, 19	No construction necessary.	
“processor configured to receive a three-dimensional model”	1, 19	A processor configured to receive a data structure representing the geometry of a three-dimensional object	
“two-dimensional projection”	1, 3, 5, 6, 19	No construction necessary.	
“Two-dimensional projection of the three-dimensional model”	1, 3, 5, 6, 19	two-dimensional image derived from a three-dimensional computerized model	
“upon completion of the object”	20	No construction necessary	

VI. United States Patent No. 8,747,097

Term	Claim(s)	Proposed Construction	Extrinsic Evidence
Pass/fail evaluation	11	Indefinite	

Term	Claim(s)	Proposed Construction	Extrinsic Evidence
“three-dimensional scanner”	1, 8	No construction necessary.	
“object being fabricated”	1, 9, 11, 12	No construction necessary.	
“the web server displays status information”	5	No construction necessary.	
“unexpected surface hole”	19	hole on an external face of the object being fabricated that is not specified by the three-dimensional model	
“abort a fabrication process of the three-dimensional printer upon detection of an unrecoverable error”	17	No construction necessary	
“web server”	1, 4, 5	a hardware or software system that transmits one or more web pages over a network	Wiley Electrical and Engineering Dictionary (BAMBU-00189948) Dictionary of Computing Sixth Edition (BAMBU-00189927)
“server”	1, 4, 5	software or hardware that provides services in response to a client request	Newton's Telecom Dictionary 24th Edition (BAMBU-00189935) Telecom Dictionary (Althos) (BAMBU-00189938) Wiley Electrical and Electronics Engineering Dictionary (BAMBU-00189948)

Term	Claim(s)	Proposed Construction	Extrinsic Evidence
			Webster's New World Telecom Dictionary (BAMBU-00189941) Microsoft Computer Dictionary Fifth Edition (BAMBU-00189932)
“image content”	1	No construction necessary.	
“a machine vision system configured to capture and analyze image content”	1, 9-11, 12, 14-18	a machine vision system configured to capture and analyze one or more graphic pictures	Microsoft Computer Dictionary Fifth Edition (BAMBU-00189928)
“the web server is configured to host a remote user”	4	No construction necessary.	
“misalignment of layers”	18	Indefinite	Bambu intends to rely on Dr. Andrew Wolfe in support of this term. Dr. Wolfe is anticipated to offer an opinion that the term is indefinite because after reviewing and considering the specification, prosecution history, and intrinsic and extrinsic record, a POSITA would be unable to ascertain the scope of the claim term with reasonable certainty.

VII. United States Patent No. 9,421,713

Term	Claim(s)	Proposed Construction	Extrinsic Evidence
“deposition line”	1, 2	“a line that heats and deposits material”	• U.S. Pat. No. 7,604,470 (BAMBU-00037986) • U.S. Pat. No. 7,625,200 (BAMBU-00189785) • U.S. Pat. No. 6,722,872 (BAMBU-00189894) • U.S. Pat. No. 5,503,785 (BAMBU-00189886) • <i>What is FDM (fused deposition modeling) 3D printing?</i>, Protolab Networks Knowledge Base, https://www.hubs.com/knowledge-base/what-is-fdm-3d-printing/#:~:text=This%20extrusion%20head%20is%20attached,the%20material%20cools%20and%20solidifies (BAMBU-00189909) • <i>What is FDM 3D Printing?</i>, SYS-Stratasys, https://www.sys-uk.com/3d-printers/fdm/#:~:text=When%20the%20nozzle%20hits%20the,Uses%20of%20FDM (BAMBU-00189874) • <i>FDM and PolyJet 3D Printing: Determining Which Technology is Right For Your</i>

Term	Claim(s)	Proposed Construction	Extrinsic Evidence
			Application, Stratasys, https://www.stratasys.com/contentassets/8c6f150a94d146fa8a0db71ded11d843/wp_du_fdmvspolyjet_a4_0917a.pdf?v=4a056b (BAMBU-00189834) • <i>Fused Deposition Modeling (FDM) 3D Printing Service</i>, Xometry, https://www.xometry.com/capabilities/3d-printing-service/fused-deposition-modeling/ (BAMBU-00189850)
“stand-by mode”	1, 2	“a mode in which the print head or deposition line is not heating any material for extrusion”	• <i>Parameters in Material Settings</i>, SNAPMAKER WIKI, https://wiki.snapmaker.com/en/Snapmaker_Luban/3d_maintoolbar_material_parameters (last visited 08/18/2025) (BAMBU-00189752) • Antonella Sola et al., <i>Environmental Impact of Fused Filament Fabrication: What Is Known from Life Cycle Assessment?</i>, <i>Polymers (Basel)</i> 16 (14):1986 (2024), available at https://pmc.ncbi.nlm.nih.gov/articles/PMC11281121 (BAMBU-00189700)

Term	Claim(s)	Proposed Construction	Extrinsic Evidence
			• <i>Setting the Temperature - BCN3D Stratos</i>, KNOWLEDGE BASE - BCN3D, https://support.bcn3d.com/knowledge/temperature (last visited 08/18/2025) (BAMBU-00189779) • Terence - AMakerDad.com, <i>Where does the initial bed and hot end temperature setting come from and how can I remove it?</i>, PrusaSlicer Forum (Dec. 18, 2021, 10:52 pm), https://forum.prusa3d.com/forum/prusaslicer/where-does-the-initial-bed-and-hot-end-temperature-setting-come-from-and-how-can-i-remove-it/ (BAMBU-00189828) • <i>Keeping the Printer in Idle Mode</i>, STRATASYS OBJET1000 PLUS, https://support.stratasys.com/SupportCenter/HTML5UserGuides/Objet1000_UG_Feb_2019/Content/6_Topics_Printer/Keeping_the_Printer_in_I.htm (BAMBU-00189751) • U.S. Pat. No. 6,722,872 (BAMBU-00189894)

Term	Claim(s)	Proposed Construction	Extrinsic Evidence
			• U.S. Pat. No. 5,503,785 (BAMBU-00189886) • <i>What is FDM (fused deposition modeling) 3D printing?</i>, Protolab Networks Knowledge Base, https://www.hubs.com/knowledge-base/what-is-fdm-3d-printing/#:~:text=This%20extrusion%20head%20is%20attached,the%20material%20cools%20and%20solidifies (BAMBU-00189909) • <i>What is FDM 3D Printing?</i>, SYS-Stratasys, https://www.sys-uk.com/3d-printers/fdm/#:~:text=When%20the%20nozzle%20hits%20the,Uses%20of%20FDM (BAMBU-00189874) • <i>FDM and PolyJet 3D Printing: Determining Which Technology is Right For Your Application</i>, Stratasys, https://www.stratasys.com/contentassets/8c6f150a94d146fa8a0db71ded11d843/wp_du_fdmvspolyjet_a4_0917a.pdf?v=4a056b (BAMBU-00189834) • <i>Fused Deposition Modeling (FDM) 3D Printing Service</i>, Xometry, https://www.xometry.c

Term	Claim(s)	Proposed Construction	Extrinsic Evidence
			om/capabilities/3d-printing-service/fused-deposition-modeling/ (BAMBU-00189850)
“performing a purge operation for each print head or deposition line switched to the operating mode, the purge operation comprising printing at least one purge tower in a layer by layer manner”	1	No construction necessary	
“purge operation”	1	No construction necessary	

VIII. United States Patent No. 7,555,357

Term	Claim(s)	Proposed Construction	Extrinsic Evidence
“determining dimensions of the void region” / “determining the dimensions of the void region”	1, 4, 8, 12	determining dimensions of the void region with at least one generated raster path / determining the dimensions of the void region with at least one generated raster path	

Term	Claim(s)	Proposed Construction	Extrinsic Evidence
“void region”	1, 4, 7, 8, 10, 12, 14, 15, 16, 18	Indefinite	Bambu intends to rely on Dr. Mark Ganter in support of this term. Dr. Ganter is anticipated to offer an opinion that the term is indefinite because after reviewing and considering the specification, prosecution history, and intrinsic and extrinsic record, a POSITA would be unable to ascertain the scope of the claim term with reasonable certainty.
“pan of a cavity”	15	No construction necessary	
“intermediate path”	1, 2, 3, 6, 10, 11, 16, 17	“a temporary path used to generate the build path but not used to deposit build material”	
“road width resolution”	2, 8, 9, 10, 15	Indefinite	Bambu intends to rely on Dr. Mark Ganter in support of this term. Dr. Ganter is anticipated to offer an opinion that the term is indefinite because after reviewing and considering the specification, prosecution history, and intrinsic and extrinsic record, a POSITA would be unable to ascertain the scope of the claim term with reasonable certainty.

IX. United States Patent No. 9,592,660

Term	Claim(s)	Proposed Construction	Extrinsic Evidence
“a polymer coating attached to a surface of the thermally conductive plate... wherein the polymer coating is not a polymer tape”	1	No construction necessary	
“a temperature control unit configured to control heating”	1	No construction necessary	
“a build platform with a temperature control unit”	1	No construction necessary	
a thermally conductive plate disposed adjacent to the build platform; and	1	Indefinite	Bambu intends to rely on Dr. Michael Hickner in support of this term. Dr. Hickner is anticipated to offer an opinion that the term is indefinite because after reviewing and considering the specification, prosecution history, and intrinsic and extrinsic record, a POSITA would be unable to ascertain the scope of the claim term with reasonable certainty.

Term	Claim(s)	Proposed Construction	Extrinsic Evidence
“without chemically or mechanically removing the polymer coating from the 3D object”	1	Indefinite	
“without damaging the polymer coating”	1	Indefinite	

X. United States Patent No. 11,886,774

Term	Claim(s)	Proposed Construction	Extrinsic Evidence
“properties”	1	No construction necessary	
“configuration information”	1	No construction necessary	
“properties from the target printer that affect fabrication capabilities of the target printer”	1	Indefinite	Bambu intends to rely on Dr. Michael Hickner in support of this term. Dr. Hickner is anticipated to offer an opinion that the term is indefinite because after reviewing and considering the specification, prosecution history, and intrinsic and extrinsic record, a POSITA would be unable to ascertain the scope of the claim term with reasonable certainty.
“fabrication profile”	1	No construction necessary	

Dated: August 20, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 20, 2025 they caused the foregoing
BAMBU'S P.R. 4-2 LIST OF PRELIMINARY CLAIM CONSTRUCTIONS AND EXTRINSIC
EVIDENCE to be served by electronic mail upon the below listed counsel of record:

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