

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

NINGDE AMPEREX TECHNOLOGY
LIMITED,

Plaintiff,

v.

ZHUHAI COSMX BATTERY CO. LTD.,

Defendant.

Case No. 2:24-cv-728-JRG

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION CHART

PURSUANT TO PATENT RULE 4-5(d)

In compliance with Patent Rule 4-5(d) and the Court's Docket Control Order (Dkt. No. 27), Plaintiff Ningde Amperex Technology Limited ("ATL" or "Plaintiff") and Defendant Zhuhai CosMX Battery Co. Ltd. ("CosMX" or "Defendant") hereby submit the Joint Claim Construction Chart attached as Exhibit A (disputed terms) and Exhibit B (agreed terms).

DATED: December 30, 2025

Respectfully submitted,

By: /s/ Michael Powell

Michael D. Powell

California Bar No. 202850

QUINN EMANUEL URQUHART & SULLIVAN LLP

mikepowell@quinnemanuel.com

50 California Street, 22nd Floor

San Francisco, California 94111

Telephone: (415) 875-6600

Facsimile: (415) 875-6700

Lance Yang

California Bar No. 260705

QUINN EMANUEL URQUHART & SULLIVAN LLP

lanceyang@quinnemanuel.com

865 S. Figueroa St., 10th Floor

Los Angeles, California 90017

Telephone: (213) 443-3000

Facsimile: (213) 443-3100

G. Blake Thompson

State Bar No. 24042033

Blake@TheMannFirm.com

MANN | TINDEL | THOMPSON

112 E. Line Street, Suite 304

Tyler, Texas 75702

Telephone: (903) 657-8540

Facsimile: (903) 657-6003 (fax)

Attorneys for Plaintiff Ningde Ampere Technology Limited

DATED: December 30, 2025

Respectfully submitted,

By: /s/ Michael Hendershot

Michael C. Hendershot

JONES DAY

1755 Embarcadero Rd

Palo Alto, CA 94303

Phone: 650.739.3939

mhenderson@jonesday.com

Blaney Harper

JONES DAY

2727 N Harwood Street

Dallas, TX 75201-1515 Phone: 202.969.3725

bharper@jonesday.com

Melissa Richards Smith

SBN: 24001351

GILLAM & SMITH LLP

303 South Washington Ave

Marshall, TX 75670

Phone: 903.934.8450

melissa@gillamsmithlaw.com

Attorneys for Defendant Zhuhai CosMX Battery Co. Ltd.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service by email on this December 30, 2025.

December 30, 2025

/s/ Leon Lin