

EXHIBIT B

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DEFENDANT COSMX'S P.R. 4-3 PROPOSED CONSTRUCTIONS OF CLAIM TERMS
WITH INTRINSIC AND EXTRINSIC EVIDENCE

I. U.S. Patent No. 11,769,910 (“the ’910 patent”)

Claim Term	’910 Patent Claim(s)	Proposed Construction	Defendant’s Supporting Evidence
“a weight percentage of the dinitrile compound is X”	1, 4, 6, 12, 18-20, 22-25	a weight percentage of all dinitrile compounds present in the electrolyte is X	The ’910 Patent claims, specification, and file history, including at least the following: Abstract, 1:46-48, 1:64-2:24, 5:66-67, 6:1-57, 6:59-7:43, 23:48-58, 25:9-26:11, 26:40-43, 26:48-27:39 (Tables 1-1 and 1-2), 28:61-64, 29:1-19 (Table 2) ’910 Patent File History – March 23, 2023 Non-Final Rejection, pages 5-7. ’910 Patent File History – April 10, 2023, Arguments/Remarks Made in Amendment, page 2. ’910 Patent File History – April 20, 2023, Non-Final Rejection, pages 3-11, 14. ’910 Patent File History – July 18, 2023, Examiner Interview. ’910 Patent File History – July 20, 2023, Amendment And Response, page 9.

Claim Term	'910 Patent Claim(s)	Proposed Construction	Defendant's Supporting Evidence
"a weight percentage of the trinitrile compound is Y"	1, 4-6, 12, 18-20, 22-26	a weight percentage of all trinitrile compounds present in the electrolyte is Y	The '910 Patent claims, specification, and file history, including at least the following: Abstract, 1:48-49, 1:64-2:24, 5:66-67, 6:1-57, 7:45-8:33, 23:48-58, 25:9-26:11, 26:40-43, 26:48-27:39 (Tables 1-1 and 1-2), 28:61-64, 29:1-19 (Table 2)
"only a single-sided coating or a double-sided coating present on the same electrode."	14	Indefinite	The '910 Patent claims, specification, and file history, including at least the following: 2:58-3:7, 21:4-16, 21:40-22:9, claim 14, claim 13, claim 12. '910 Patent File History – December 7, 2022, Original Claims '910 Patent File History – July 20, 2023, Amended Claims '910 Patent File History – July 24, 2023, Examiner Interview Summary
"wherein the electrode comprises an anode"	15	Indefinite	The '910 Patent claims, specification, and file history, including at least the following: 3:3-7, 22:1-10, claim 13

Claim Term	'910 Patent Claim(s)	Proposed Construction	Defendant's Supporting Evidence
			'910 Patent File History – December 7, 2022, Original Claims '910 Patent File History – July 20, 2023, Amended Claims '910 Patent File History – July 24, 2023, Examiner Interview Summary

II. U.S. Patent No. 11,799,131 (“the ’131 Patent”)

Claim Term	'131 Patent Claim(s)	Proposed Construction	Defendant's Supporting Evidence
“a weight percentage of the dinitrile compound is X”	1, 7, 14	a weight percentage of all dinitrile compounds present in the electrolyte is X	The '131 Patent claims, specification, and file history, including at least the following: Abstract, 1:45-47, 1:63-2:24, 5:66-67, 6:1-55, 6:56-7:39, 23:11-20, 24:44-26:16, 26:17-20, 26:25-27:10 (Tables 1-1 and 1-2), 28:22-25, 28:29-48 (Table 2). '131 Patent File History – August 11, 2022, Original Claims. '131 Patent File History – April 20, 2023, Non-Final Rejection, pages 3-6. '131 Patent File History – July 20, 2023, Applicant Arguments/Remarks, pages 12-18. '131 Patent File History – July 20, 2023, Amended Claims. '131 Patent File History – July 24, 2023, Examiner Interview Summary. '131 Patent File History – September 7, 2023, Notice of Allowance.

Claim Term	'131 Patent Claim(s)	Proposed Construction	Defendant's Supporting Evidence
"a weight percentage of the trinitrile compound is Y"	1, 7, 14	a weight percentage of all trinitrile compounds present in the electrolyte is Y	The '131 Patent claims, specification, and file history, including at least the following: Abstract, 1:47-48, 1:63-2:24, 5:66-67, 6:1-55, 7:40-8:27, 23:11-20, 24:44-26:16, 26:17-20, 26:25-27:10 (Tables 1-1 and 1-2), 28:22-25, 28:29-48 (Table 2) '131 Patent File History – August 11, 2022, Original Claims. '131 Patent File History – April 20, 2023, Non-Final Rejection, pages 3-6. '131 Patent File History – July 20, 2023, Applicant Arguments/Remarks, pages 12-18. '131 Patent File History – July 20, 2023, Amended Claims. '131 Patent File History – July 24, 2023, Examiner Interview Summary. '131 Patent File History – September 7, 2023, Notice of Allowance.

III. U.S. Patent No. 10,964,927 (“the ’927 patent”)

Subject to CosMX’s reservations of rights set forth above, CosMX does not contend that any term of this patent requires construction at this time.

IV. U.S. Patent No. 11,575,148 (“the ’148 patent”)

Claim Term	’148 Patent Claim(s)	Proposed Construction	Defendant’s Supporting Evidence
“the pores at least comprises a part of the inorganic particles”	1, 10	Indefinite	The ’148 Patent claims, specification, and file history, including at least the following: Abstract, 1:45-50, 2:61-64, 2:65-67, 3:1-3, 3:52-4:49, 5:50-60, 23:65-24:3, 24:3-8, 24:9-57, 25:1-11, FIGs 1-3. U.S. Pat. No. 10,833,355 File History (parent of ’148 Patent) – April 22, 2020, Office Action. U.S. Pat. No. 10,833,355 File History (parent of ’148 Patent) – July 22, 2020, Amendment. U.S. Pat. No. 10,833,355 File History (parent of ’148 Patent) – August 24, 2020, Notice of Allowance. IPR2025-00432 – Patent Owner’s Discretionary Denial Brief, pages 23-26. IPR2025-00432 – Decision Granting Institution of IPR (Paper 10), pages 18-19.

V. U.S. Patent No. 11,923,498 (“the ’498 patent”)

Claim Term	’498 Patent Claim(s)	Proposed Construction	Defendant’s Supporting Evidence
“the positive plate”	1, 9, 17, 20-22	Indefinite	The ’498 Patent claims, specification, and file history, including at least the following: ’498 Patent, claims 1, 9, 17, 20-22. ’498 Patent File History – May 17, 2022, Original Claims. ’498 Patent File History – August 8, 2022, Amended Claims. ’498 Patent File History – October 24, 2022, Final Rejection. ’498 Patent File History – January 24, 2023, Request for Continued Examination, Amendment/Remarks, Claims ’498 Patent File History – January 30, 2024, Examiner Interview Summary Record ’498 Patent File History – March 31, 2023, Non-Final Rejection ’498 Patent File History – May 11, 2023, Examiner Interview Summary Record

			'498 Patent File History – June 29, 2023, Amendment/Remarks, Claims '498 Patent File History – July 9, 2023, Notice of Allowance
“the negative plate”	1, 9, 17, 20-22	Indefinite	The '498 Patent claims, specification, and file history, including at least the following: '498 Patent, claims 1, 9, 17, 20-22. '498 Patent File History – May 17, 2022, Original Claims. '498 Patent File History – August 8, 2022, Amended Claims. '498 Patent File History – October 24, 2022, Final Rejection '498 Patent File History – January 24, 2023, Request for Continued Examination, Amendment/Remarks, Claims. '498 Patent File History – January 30, 2024, Examiner Interview Summary Record. '498 Patent File History – March 31, 2023, Non-Final Rejection.

			'498 Patent File History – May 11, 2023, Examiner Interview Summary Record. '498 Patent File History – June 29, 2023, Amendment/Remarks, Claims. '498 Patent File History – July 9, 2023, Notice of Allowance.
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VI. U.S. Patent No. 12,015,118 (“the ’118 patent”)

Claim Term	’118 Patent Claim(s)	Proposed Construction	Defendant’s Supporting Evidence
“a first layer comprising a first material”	1-4, 7, 9-13, 16, 18-19	a first layer comprising a first active material	The ’118 Patent claims, specification, and file history, including at least the following: Abstract, 1:36-59, 2:8-43, 2:58-3:3, 4:18-31, 4:32-54, 6:20-27, 8:26-14:50 (Examples 1-50), Table 1, FIGs 1-2. IPR2025-00524, Patent Owner’s Discretionary Denial Brief, pages 10-11. IPR2025-00524, Patent Owner’s Preliminary Response, page 5.
“a second layer comprising a second material”	1, 3, 8, 10, 12, 17, 19	a second layer comprising a second active material	The ’118 Patent claims, specification, and file history, including at least the following: Abstract, 1:36-59, 2:8-43, 2:58-3:3, 4:18-31, 4:32-54, 6:20-27, 8:26-14:50 (Examples 1-50), Table 1, FIGs 1-2. IPR2025-00524, Patent Owner’s Discretionary Denial Brief, pages 10-11. IPR2025-00524, Patent Owner’s Preliminary Response, page 5.