Gibson, Dunn & Crutcher LLP
JOSH KREVITT (SBN 208552)
JKrevitt@gibsondunn.com
STUART M. ROSENBERG (SBN 239926)
SRosenberg@gibsondunn.com
310 University Avenue
Palo Alto, CA 94301
Telephone: 650.849.5300
Facsimile: 650.849.5333

BRIAN A. ROSENTHAL (*pro hac vice*)
BRosenthal@gibsondunn.com
KATHERINE Q. DOMINGUEZ (*pro hac vice*)
KDominguez@gibsondunn.com
ALLEN KATHIR (*pro hac vice*)
AKathir@gibsondunn.com
ALLYSON PARKS (*pro hac vice*)
AParks@gibsondunn.com
200 Park Avenue
New York, NY 10166
Telephone: 212.351.4000
Facsimile: 212.351.4035

GIBSON, DUNN & CRUTCHER LLP
JAYSEN S. CHUNG (SBN 280708)
JSChung@gibsondunn.com
One Embarcadero Center, Suite 2600
San Francisco, CA 94111
Telephone: 415.393.8200
Facsimile: 415.393.8306

NATHANIEL R. SCHARN (SBN 305836)
NScharn@gibsondunn.com
3161 Michelson Drive, Suite 1200
Irvine, CA 92612
Telephone: 949.451.3800
Facsimile: 949.451.4220

HANNAH L. BEDARD (*pro hac vice*)
HBedard@gibsondunn.com
WENDY W. CAI (*pro hac vice*)
WCai@gibsondunn.com
1700 M STREET, NW
Washington, DC 20036
Telephone: 202.955.8500
Facsimile: 202.467.0539

Attorneys for Defendant Samsara Inc.

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

MOTIVE TECHNOLOGIES, INC.,

Plaintiff and Counterclaim Defendant,

v.

SAMSARA INC.,

Defendant and Counterclaim Plaintiff.

Case No. 3:24-CV-00902-JD

DEFENDANT AND COUNTERCLAIM PLAINTIFF SAMSARA INC.'S RESPONSIVE CLAIM CONSTRUCTION BRIEF

Samsara EX1087
Samsara v. Motive
IPR2025-00574

TABLE OF CONTENTS

I. Introduction 1
II. Background of the '580 and '276 Patents 1
III. Construction Of Disputed Claim Terms 2
A. "camera parameter" (claims 1, 3-7 of the '580 patent and claims 1, 2, 7, 8, 9, 14, 15, 20 of the '276 patent) 2
i. The claims and specification confirm Samsara's proposed construction and show Motive's construction is wrong 3
ii. The prosecution history requires Samsara's proposed construction 4
iii. Motive's expert cannot override the patents and prosecution history 6
B. "an image of a roadway recorded by a camera device" (claims 1, 8, and 15 of the '276 Patent) 9
C. "predictive model" (claims 1, 3, 4 of the '580 patent) 10
D. Order of Steps 14
i. Claim 1 of the '580 patent 14
ii. Claims 1, 8, 15 of the '276 patent 18
IV. Conclusion 20

TABLE OF EXHIBITS

Exhibit	Document
Ex. 1	U.S. Patent No. 11,875,580
Ex. 2	U.S. Patent No. 12,136,276
Ex. 3	U.S. Patent No. 11,875,580 Patent Prosecution File History
Ex. 4	U.S. Patent No. 12,136,276 Patent Prosecution File History
Ex. 5	Znidarsic Declaration (Dkt. 172-5, Ex. D)
Ex. 6	Znidarsic Deposition Transcript (2026.03.02)
Ex. 7	Amended Motive DC-53 '580 Patent Claim Chart
Ex. 8	U.S. Patent Application Publication No. 2021/0248392 (Appl. No. 17/173,950)
Ex. 9	IPR2025-00574 Patent Owner's Preliminary Response
Ex. 10	IPR2025-00574 Institution Decision
Ex. 11	IPR2025-00574 Patent Owner's Response

TABLE OF ABBREVIATIONS

Abbreviation	Meaning
’276 patent	U.S. Patent No. 12,136,276
’580 patent	U.S. Patent No. 11,875,580
Motive	Plaintiff and Counterclaim Defendant Motive Technologies, Inc.
Samsara	Defendant and Counterclaim Plaintiff Samsara Inc.

TABLE OF AUTHORITIES

Page(s)

Cases

Ajinomoto v. ITC,
932 F.3d 1342 (Fed. Cir. 2019).....5

Avid Tech., Inc. v. Harmonic, Inc.,
812 F.3d 1040 (Fed. Cir. 2016).....13

Brandywine Commc'ns Techs., LLC v. AT&T Corp.,
No. 12-cv-2494-CW, 2014 WL 1569544 (N.D. Cal. Apr. 18, 2014).....11

Hill-Rom Servs., Inc. v. Stryker Corp.,
755 F.3d 1367 (Fed. Cir. 2014).....12

Iridescent Networks v. AT&T Mobility,
933 F.3d 1345 (Fed. Cir. 2019).....5

Kinetic Concepts, Inc. v. Blue Sky Med. Grp., Inc.,
554 F.3d 1010 (Fed. Cir. 2009).....4

Maxim Integrated Prods., Inc. v. Silicon Mitus Tech., Inc.,
No. 17-CV-03507 NC, 2018 WL 4657384 (N.D. Cal. July 3, 2018).....17, 20

Medrad, Inc. v. MRI Devices Corp.,
401 F.3d 1313 (Fed. Cir. 2005).....16

Merck & Co. v. Teva Pharms. USA, Inc.,
395 F.3d 1364 (Fed. Cir. 2005).....16

Mformation Techs., Inc. v. Rsch. in Motion Ltd.,
764 F.3d 1392 (Fed. Cir. 2014).....15, 17, 20

Microsoft Corp. v. Multi-Tech. Sys., Inc.,
357 F.3d 1340 (Fed. Cir. 2004).....17

MyMail, Ltd. v. America Online, Inc.,
476 F.3d 1372 (Fed. Cir. 2007).....16

Nystrom v. TREX Co.,
424 F.3d 1136 (Fed. Cir. 2005).....6

Omega Eng'g, Inc. v. Raytek Corp.,
334 F.3d 1314 (Fed. Cir. 2003).....11, 13

Phillips v. AWH Corp.,
415 F.3d 1303 (Fed. Cir. 2005) (en banc).....7

Rothschild Connected Devices Innovations, LLC v. Coca-Cola Co.,
No. 2024-1253, 2025 WL 2964300 (Fed. Cir. Oct. 21, 2025).....16

SkinMedica, Inc. v. Histogen Inc.,
727 F.3d 1187 (Fed. Cir. 2013) 7

Solaria Corp. v. Canadian Solar Inc.,
No. 20-CV-02169-JST, 2021 WL 11701385 (N.D. Cal. Nov. 19, 2021) 5

Standard Oil Co. v. Am. Cyanamid Co.,
774 F.2d 448 (Fed. Cir. 1985) 5

TecSec, Inc. v. Int'l Bus. Machines Corp.,
731 F.3d 1336 (Fed. Cir. 2013) 6

Vitronics Corp. v. Conceptronic, Inc.,
90 F.3d 1576 (Fed. Cir. 1996) 6

Statutes

35 U.S.C. § 103 13

I. INTRODUCTION

Motive asks this Court to rewrite the claims of its patents, expanding their scope in ways that contradict the patents' own teachings and violate express representations Motive made to the Patent Office to obtain allowance of the claims. That is impermissible.

Because Motive's constructions find no support in the patents and prosecution history, Motive largely ignores those documents—the documents that matter—and attempts to manufacture support through its expert, Mr. Znidarsic. In many instances, Mr. Znidarsic's testimony is not just the primary support Motive offers, it is all Motive has. Indeed, Motive's argument on many terms essentially just copies, almost word-for-word, Mr. Znidarsic's declaration. But the Federal Circuit has repeatedly stressed that expert testimony has little relevance to the claim construction analysis, and here, it has even less. Motive does not identify anything in the claim language as a term of art on which an expert in the field could shed light, nor would Mr. Znidarsic be the person to call on, if Motive had—for example, he repeatedly disclaimed an ability to answer questions regarding "camera parameter" on the grounds that he is "not a camera expert." Where Mr. Znidarsic does anything other than quote from the patents (for which an expert is not needed), it is to inject concepts that are not found in, and even contradict, the patents.

In contrast, Samsara's proposed constructions reflect the meaning conveyed in the claims themselves, as informed by the specification and the prosecution history. Accordingly, the Court should adopt Samsara's constructions and reject Motive's.

II. BACKGROUND OF THE '580 AND '276 PATENTS

The '580 and '276 patents, entitled "Camera initialization for lane detection and distance estimation using single-view geometry," are both related, share the same specification, and claim an October 4, 2021 priority date. Both patents are directed to calibrating a dashboard-mounted camera that may be installed in various positions within a vehicle. According to the specification, conventional approaches required the use of multiple cameras or expensive sensors. '580 patent (Ex. 1), 1:10-17. The patent states that a "monocular camera" could be used instead, but the prior art allegedly required the camera's location to be "predefined or preset," which was challenging for a camera that might be "retrofitted and adjustable within the vehicle." *Id.* at 1:10-23.

The patents purport to address this problem through a camera parameter-based calibration technique that proceeds through a defined order. First, the system receives footage from the camera. *Id.* at 4:60-62. Next, it identifies lines such as "lane and horizon" lines or markers in that footage. *Id.* at 5:21-37. Then, based on those identified lines, the system computes camera parameters that describe the camera's physical position and orientation relative to the road, such as "camera height, viewing angle, and road plane normal." *Id.* at 5:38-46; *see also id.* at 8:14-19 (explaining that "downstream processes can use the horizon line to determine the height of a camera and its viewing angle (i.e., road plane normal) with respect to the ground"). The system then overlays the identified lines on the footage and transmits the overlaid footage to an annotator device for human review. *Id.* at 5:48-56. Only after the human reviewer confirms or modifies the identified lines does the system transmit the computed camera parameters back to the camera device. *Id.* at 5:65-6:14. As the specification states, "[o]nce the horizon line is confirmed, the system returns the camera parameters to the calling party (e.g., a camera onboard a vehicle)." *Id.* at 1:50-52. According to the specification, the camera then uses the camera parameters to "perform lane detection and distance estimation, respectively, while a camera is in motion." *Id.* at 6:11-14.

The asserted claims of the '580 and '276 patents cover variations of the above process that are intended to obtain accurate camera parameters for calibrating a camera. The primary difference is that the '580 patent claims require computing camera parameters before human review of the detected horizon line and then transmitting those parameters after receiving confirmation that they are accurate, whereas the '276 claims require the reviewer to modify the detected horizon line, then compute the camera parameter based on that modification before transmitting it back to the camera.

III. CONSTRUCTION OF DISPUTED CLAIM TERMS

A. "camera parameter" (claims 1, 3-7 of the '580 patent and claims 1, 2, 7, 8, 9, 14, 15, 20 of the '276 patent)

Samsara's Proposed Construction	Motive's Proposed Construction
"property of the camera itself"	"value(s) associated with one or more operating characteristics of a camera"

The parties agree the term "camera parameter" requires construction. Samsara's proposed construction, "property of the camera itself," not only reflects how the term is used in the patent, it

is ***exactly***—word for word—the definition Motive gave the Patent Office during prosecution, to overcome a prior art rejection. Motive's proposal, on the other hand—"value(s) associated with one or more operating characteristics of a camera"—finds no support in the patent and contradicts what Motive avowed to the Patent Office in prosecution. Tellingly, Motive never once cites either the patent or the prosecution history in support of its construction. *See* Br. at 9-10. This is no accident: Motive's infringement theory depends on a "camera parameter" being a characteristic of an image, such as a horizon line or vanishing point, which the patent and prosecution history make clear are ***not*** camera parameters. *See, e.g.*, Motive DC-53 '580 Patent Claim Chart (Ex. 7), 2-5.[1] The Court should reject Motive's attempt to broaden the claims to manufacture an infringement theory that contradicts the patent and the prosecution history.

i. The claims and specification confirm Samsara's proposed construction and show Motive's construction is wrong

The claims themselves demonstrate that a "camera parameter" is a "property of the camera itself." The claim language on its face conveys this meaning: "camera" modifies "parameter," meaning that the parameter is a property of the camera. The claims further use "camera parameter" to describe particular properties of the camera with respect to its position: the claims identify height (how high the camera is off the ground), viewing angle (the angle at which the camera is looking at the road), and road plane normal (the camera's field of view relative to the road surface) as camera parameters. '580 patent, cl. 5 ("camera parameter comprises a camera height and road plane normal"); '276 patent (Ex. 2), cl. 2 ("camera parameter comprises one of camera height, viewing angle, and road plane normal"), cl. 9 (same). Each of these values describes where the camera is in three-dimensional space and thus is a property of the camera. The claims thus show a "camera parameter" is a "property of the camera itself."

The claims also distinguish a camera parameter from visual features detected in an image frame—contradicting Motive's attempt to include features of an image within the term "camera parameter." For example, claim 1 of the '580 patent recites "identifying . . . a horizon line" and then "computing at least one camera parameter based on" the horizon line. '580 patent, cl. 1. The

[1] Samsara recognizes that the Court does not need to consider a party's infringement theory in construing the claims, but Motive's infringement theory here provides revealing context.

claim structure makes clear that visual features like horizon lines are inputs to computing a camera parameter, while camera parameters (height, viewing angle, road plane normal) are the outputs that describe the camera's position and orientation. Yet, Motive's proposed construction erases this distinction and would equate "horizon line" and other visual features of an image frame with a camera parameter. Motive's rewriting is impermissible.

The specification further confirms that "camera parameter" refers to "a property of the camera itself." Throughout the specification, every reference to "camera parameter" describes properties of the camera's position and orientation in space, such as height, viewing angle, and road plane normal. '580 patent, 1:42-44 ("[T]he system computes some camera parameters (e.g., height, viewing angle, road plane normal, etc.) based on the horizon line."); *see also id.* at 1:61-64, 4:23-28, 9:1-4, 9:28-32, 11:11-16, 13:42-44, 15:28-30. These repeated and consistent descriptions support construing "camera parameter" to mean a "property of the camera itself." *See, e.g.*, *Kinetic Concepts, Inc. v. Blue Sky Med. Grp., Inc.*, 554 F.3d 1010, 1019 (Fed. Cir. 2009) (construing term in accordance with "[a]ll of the examples described in the specification").

The specification also distinguishes between camera parameters and visual features in an image frame—once again contradicting Motive's proposed construction. The specification teaches that a camera parameter is computed based on visual features, but the visual features, themselves, are not camera parameters. For instance, the specification incorporates by reference U.S. Patent Application No. 17/173,950. '580 patent, 5:38-47. The incorporated disclosure describes computing a camera parameter by detecting a vanishing point, then a horizon line, and then computing a camera parameter (an "IPM"). '950 App. (Ex. 8) ¶ 38. This makes clear that a vanishing point and horizon line are not, themselves, camera parameters, but are instead visual features of an image frame that are used to compute a camera parameter. Motive's proposed construction, however, would improperly sweep vanishing points and horizon lines into the meaning of a camera parameter.

ii. The prosecution history requires Samsara's proposed construction

The prosecution history not only confirms, but mandates, Samsara's construction, based on Motive's unequivocal statements to the Patent Office, made to overcome a prior art rejection.

During prosecution, the examiner found that a prior art publication ("Kwant1") disclosed the "camera parameter" element of the claims. '580 patent FH (Ex. 3), 131-32. Motive distinguished Kwant1 by arguing that Kwant1's parameters were not related to a camera but were instead representations of a lane line in an image. *Id.* at 146 ("[Kwant1's] 'parameters' are not parameters related to a camera, they are of a 'parametric representation of a single lane line.'"). In other words, Motive told the Patent Office that the very thing it now accuses as a "camera parameter"—and seeks a construction to cover—is ***not*** a "camera parameter" in the '580 and '276 patents.[2] Motive then stated unequivocally: "***the specification is clear that a camera parameter is a property of the camera itself*** (e.g., height, viewing angle, road plane normal, etc.)." *Id.* (cleaned up and emphasis added). The examiner subsequently withdrew his argument that Kwant1 disclosed the claimed camera parameter. *Id.* at 169-71.

Motive's statements in distinguishing the prior art—which it does not even acknowledge in its brief—bind Motive. It is black letter law that a patentee must be held to what it tells the patent office about the scope of the invention. *Ajinomoto v. ITC*, 932 F.3d 1342, 1351 (Fed. Cir. 2019) ("A patentee must be held to what he declares during the prosecution of his patent, because a contrary rule would undermine the public notice function of a patent." (internal quotation marks and citation omitted)). Here, Motive's arguments distinguishing the prior art constitute disavowal and disclaimer of any interpretation of "camera parameter" that could include properties of an image, such as lane lines. *See Standard Oil Co. v. Am. Cyanamid Co.*, 774 F.2d 448, 452 (Fed. Cir. 1985) ("[T]he prosecution history (or file wrapper) limits the interpretation of claims so as to exclude any interpretation that may have been disclaimed or disavowed during prosecution in order to obtain claim allowance."); *Solaria Corp. v. Canadian Solar Inc.*, No. 20-CV-02169-JST, 2021 WL 11701385, at *3 (N.D. Cal. Nov. 19, 2021) (finding disclaimer based on use of term in the specification and prosecution history).

Motive's clear and unambiguous statement that "a camera parameter is a property of the

[2] Although these statements were made during the prosecution of the '580 patent, they apply to the '276 patent as well. *Iridescent Networks v. AT&T Mobility*, 933 F.3d 1345, 1350 (Fed. Cir. 2019) ("Statements made during prosecution of a parent application are relevant to construing terms in a patent resulting from a continuation application if such statements relate to the subject matter of the claims being construed.").

camera itself" also constitutes an express definition of the term, which likewise compels Samsara's construction. *See TecSec, Inc. v. Int'l Bus. Machines Corp.*, 731 F.3d 1336, 1345-46 (Fed. Cir. 2013) (construing term based on patentee's definitional statement during prosecution). And even if Motive's statements did not rise to the level of disclaimer or lexicography (they do), they still support adopting Samsara's construction and rejecting Motive's. *See Nystrom v. TREX Co.*, 424 F.3d 1136, 1143-46 (Fed. Cir. 2005) (rejecting broader construction, even absent disavowal of claim scope, and construing term consistent with specification and prosecution history).

Tellingly, Motive ignores this prosecution history entirely—because it unequivocally requires Samsara's construction and is irreconcilable with Motive's. But Motive "is not entitled to a claim construction divorced from the context of the written description and prosecution history." *Id.* at 1144-45. Here, that context permits only Samsara's construction.

iii. Motive's expert cannot override the patents and prosecution history

Unable to square its construction with the claims, specification, or prosecution history, Motive turns to Mr. Znidarsic for support—indeed, Motive's sole evidence cited in support of its own proposed construction (as opposed to its discussion of Samsara's) is an unexplained citation to Mr. Znidarsic's declaration. Br. at 10. What is more, from start to finish, Motive's briefing on this term is nearly a carbon copy of Mr. Znidarsic's discussion of the term. *Compare id.* at 9-10 *with* Znidarsic Decl. (Ex. 5) ¶¶ 47-51. But Mr. Znidarsic's testimony (and Motive's recycling of it) should be given no weight, as it is totally divorced from the patent documents, which are unambiguous. *Vitronics Corp. v. Conceptronic, Inc.*, 90 F.3d 1576, 1584 (Fed. Cir. 1996) ("[W]here the patent documents are unambiguous, expert testimony regarding the meaning of a claim is entitled to no weight."). Mr. Znidarsic's testimony is also unhelpful because he has no expertise relevant to this term, and instead concocted his opinions by researching extrinsic sources for which he provides no citations.

Mr. Znidarsic's opinion (and Motive's brief parroting it) begins with a crucial misstatement: that Motive's construction is "based on language in the '580 specification." Znidarsic Decl. ¶ 47; Br. at 9. Neither Mr. Znidarsic nor Motive provides a citation for this assertion, because there is nothing that supports it. The words "operating characteristics" never appear in the patent at all,

much less in connection with the term "camera parameter."

Next, Mr. Znidarsic (and Motive, in its retelling), introduces two new terms: "intrinsic parameter" and "extrinsic camera parameters." Znidarsic Decl. ¶ 48; Br. at 10. Mr. Znidarsic and Motive use these terms to label what they believe Samsara's construction is limited to ("intrinsic" parameters) and what they believe it excludes ("extrinsic" parameters). *Id.* Mr. Znidarsic places quotation marks around these phrases, but it is a mystery what he is quoting, as he provides no citations and these phrases do not appear in the patents or in either party's construction. Mr. Znidarsic testified that he encountered these terms when researching what a "camera parameter" is—since, by his own account, Mr. Znidarsic is "not a camera expert" himself. Znidarsic Tr. (Ex. 6), 141:25-142:12 (Mr. Znidarsic: "[W]hile I'm not a camera expert, I did look up how camera experts term -- define those terms, and they talk about an intrinsic parameter and an extrinsic parameter of the camera."). But it is impossible to check his sources, because they are not disclosed in his declaration. *See* Znidarsic Decl. ¶¶ 47-51.

Mr. Znidarsic's (and Motive's) argument criticizing Samsara's construction as limited to "intrinsic" parameters and excluding "extrinsic" parameters should therefore be disregarded as wholly unsupported in the first instance because Motive injected this false dichotomy out of thin air. *See Phillips v. AWH Corp.*, 415 F.3d 1303, 1318 (Fed. Cir. 2005) (en banc) ("[C]onclusory, unsupported assertions by experts as to the definition of a claim term are not useful to a court."); *SkinMedica, Inc. v. Histogen Inc.*, 727 F.3d 1187, 1208-10 (Fed. Cir. 2013) (giving no weight to expert declaration that was "conclusory and incomplete"). Moreover, the argument is without merit because Samsara's proposed construction does not draw any distinction between "intrinsic" and "extrinsic" parameters, much less exclude what Motive labels "extrinsic" parameters. Instead, Samsara's proposed construction simply requires the parameter to be "a property of the camera itself"—exactly what Motive told the Patent Office. And there is no question this includes parameters Mr. Znidarsic has labeled "extrinsic" parameters. For example, Mr. Znidarsic identifies camera height, viewing angle, and road plane normal as among the exemplary "extrinsic camera parameters," but Motive told the Patent Office in prosecution that each one is "a property of the camera itself." '580 patent FH, 146 ("[A] camera parameter is ***a property of the camera itself***

('e.g., ***height, viewing angle, road plane normal***, etc.).'") (emphases added).

While Mr. Znidarsic's labels are ultimately irrelevant, all evidence indicates they are also wrong. One of the few times the patent actually uses the word "intrinsic," it indicates that the camera's "position"—a category covering most or all of what Mr. Znidarsic calls "extrinsic" parameters—is actually an "intrinsic value." '580 patent, 13:35-37 ("camera parameters may be recalculated as desired or in response to a change in ***camera position or other intrinsic value***" (emphasis added)). Thus, although the patent does not use the phrase "intrinsic parameter"—and never uses the word "extrinsic" at all—to the extent it uses similar language, it contradicts, rather than supports, Mr. Znidarsic's argument.

Although there is no basis to credit Mr. Znidarsic's testimony even if he were qualified to give it, it should also be disregarded because he is, by his own admission, not an expert in the relevant subject matter. Mr. Znidarsic repeatedly professed that he is not a camera expert. *See, e.g.*, Znidarsic Tr., 143:4-8 ("I can't say because I can't tell, not being a camera expert . . . ."). He testified that he had to look up how "camera experts" use the term "camera parameter," because he was "not a camera expert." *Id.* at 142:6-9. Yet despite relying on outside sources, he did not disclose any of the material he relied upon, in violation of Rule 26. *See* Znidarsic Decl., 60-61. His testimony is therefore unhelpful and should be disregarded.[3]

Mr. Znidarsic's deposition testimony also confirms that if Motive's construction is adopted, it will argue that visual features in an image frame are camera parameters—exactly the opposite of what Motive told the Patent Office to overcome the prior art. In Mr. Znidarsic's view, an "operating characteristic[ ] of a camera" could be any parameter that is "either inside the camera or the context in which the camera is being used." Znidarsic Tr., 141:18-142:5. However, he was unable to identify what exactly would be captured or excluded by Motive's proposed construction, other than

[3] Mr. Znidarsic's only purported experience with computer vision with respect to vehicular systems is serving as a source code reviewer for Motive in a different lawsuit against Omnitracs. Znidarsic Decl. ¶ 15; Znidarsic Tr., 65:4-17, 66:24-67:5. But there is no evidence that Mr. Znidarsic obtained any experience related to the technology of the '580 patent. Znidarsic Tr., 43:8-22 (refusing to answer questions about Omnitracs work). Mr. Znidarsic also pointed to other experience from litigation involving serving as an expert for a case about electronic logging devices, but electronic logging has nothing to do with dashcam calibration. Znidarsic Decl. ¶ 15; Znidarsic Tr., 65:4-17, 66:24-67:5.

that it would include the examples given in the patent. *Id.* at 143:24-144:8. For instance, he could not answer whether "temperature" is a camera parameter based on Motive's proposed construction. *Id.* at 143:4-23. Without any articulable boundaries, Motive's construction allows it to capture visual features in an image frame—like a vanishing point or horizon line—within the scope of "camera parameter," even though the patents and prosecution history clearly differentiate between them. The Court should reject Motive's attempt to erase the claimed difference between visual features in an image frame and camera parameters, and hold Motive to what it expressly told the Patent Office.

B. "an image of a roadway recorded by a camera device" (claims 1, 8, and 15 of the '276 Patent)

Claim Language	Samsara's Proposed Construction	Motive's Proposed Construction
"an image of a roadway recorded by a camera device"	Plain and ordinary meaning	"a video, or video frames [of a roadway recorded by a camera device]"

The parties dispute whether the term "***an image*** of a roadway" includes a single image (as stated on its face) or must be "a video, or video frames" (Motive's position). The claim language "an image" is clear and unambiguous and does not require construction. Motive, however, seeks to rewrite the claims so that "an image" excludes a single image and only covers a video or video frames. *See, e.g.*, Znidarsic Tr., at 141:7-10 ("Does a single video frame fall within the scope of Motive's proposed construction for this term? A. No."). Motive's proposed construction reads out the plain meaning of the claim language, is inconsistent with the patent, and should be rejected.

The claims and specification confirm that the phrase "an image" means what it says. The claim recites "an image" in its singular form and, thus, covers a single image. '276 patent, cls. 1, 3-5. If the applicants wanted the claim to require video, they knew how to do so. For example, the '580 patent claims, which share the same specification as the '276 patent, explicitly recite "a video comprising a set of image frames." '580 patent, cl. 1. The applicants' choice to use "an image" in the '276 claims shows that they knew the difference between an image and a video. Motive cannot now rewrite the claims and ignore that choice.

Motive relies on the dependent claims to argue that if the vehicle is moving or above a pre-

defined speed, "image" must mean a "video, or video frames." Br. at 11-12. Specifically, Motive points to dependent claims reciting that the image is captured while the vehicle is in motion or traveling above a threshold speed and argues that capturing an "image" under these conditions necessarily requires video. Motive's argument makes no sense. There is no reason a singular image cannot be taken while the vehicle is in motion or traveling above a pre-defined speed. Cameras capture single images of moving objects all the time. And Motive's only support for this premise is the declaration of its expert, who offers the same conclusory assertion without any technical or evidentiary basis, and by his own admission is "not a camera expert." Znidarsic Tr., 142:6-9. Thus, the declaration should be given no weight. *See supra* Section III.A.iii.

The specification also confirms that "an image" can be singular. The specification repeatedly recites "the image or set of images." '276 patent, 10:7-8, 10:13-15, 10:25-28, 12:13-14, 12:19-21, 12:43-44, 12:49-51. This shows that an image can be a singular image—otherwise, the specification could have merely recited a "set of images" or "images." Under Motive's proposed construction, the specification's use of "the image or set of images" is redundant and contains superfluous language. Thus, Motive's reliance on the specification is misplaced.

There is no ambiguity in this term that requires construction, and certainly none that would justify replacing the word "an image" with "video, or video frames" and thereby exclude singular images. This term should be given its plain and ordinary meaning.

C. "predictive model" (claims 1, 3, 4 of the '580 patent)

Claim Language	Samsara's Proposed Construction	Motive's Proposed Construction
"predictive model"	Plain and ordinary meaning[4]	"model that predicts values using non-geometric calculation"

The term "predictive model" should be given its plain and ordinary meaning, which an ordinarily skilled artisan would understand as simply a model that makes predictions. The first part of Motive's construction reflects this understanding, identifying a "model that predicts values." But Motive seeks to narrow that ordinary meaning by adding a negative limitation not found in the

[4] To narrow the issues in dispute, after the parties submitted the joint claim construction statement and before Motive filed its opening brief, Samsara informed Motive that Samsara updated its proposed construction to plain and ordinary meaning.

claims—namely that the model must use "non-geometric calculation." There is no basis to do so.

There is no reason to depart from the plain and ordinary meaning by importing an additional negative limitation that is not "inherent in the term." *Omega Eng'g, Inc. v. Raytek Corp.*, 334 F.3d 1314, 1322 (Fed. Cir. 2003). "A court . . . should not add a negative limitation to a claim unless it finds an 'express disclaimer or independent lexicography in the written description of [the invention] that would justify adding that negative limitation.'" *Brandywine Commc'ns Techs., LLC v. AT&T Corp.*, No. 12-cv-2494-CW, 2014 WL 1569544, at *8 (N.D. Cal. Apr. 18, 2014) (quoting *Omega*, 334 F.3d at 1323) (alteration in original). Here, the term "predictive model" is not a phrase coined by the '580 patent and is not specially defined in or limited by the patent—indeed, Motive does not argue there is lexicography here. Motive's proposed negative limitation requiring non-geometric calculations is instead based on improperly importing limitations from some embodiments in the specification and on an incorrect prosecution history disclaimer argument that misreads and omits parts of the prosecution history.

The claim language is non-limiting. The claim language does not recite any limitations restricting how the "predictive model" makes its predictions. Claim 1 recites that "one or more lines" are identified using a predictive model, but does not otherwise impose any limitations on how the predictive model identifies those lines. The dependent claims add other requirements to the predictive model, such as using the predictive model to predict the camera parameter (claim 3) or predicting the camera parameter using a second predictive model (claim 4). However, no claim adds any limitation on how the predictive model performs its prediction. Indeed, that is exactly what the Patent Office concluded, in *inter partes* review of the '580 patent. There, Motive tried to avoid institution of Samsara's IPR by arguing the asserted prior art references did not disclose a "predictive model" because a "predictive model" had to use a non-geometric calculation. Patent Owner's Prelim. Resp. (Ex. 9), 25-28. The PTAB instituted the IPR over Motive's arguments and noted "[a]part from identifying one or more lines in a video, claim 1 does not limit a 'predictive model' in any way." Institution Decision (Ex. 10), 11.[5]

[5] A final written decision for this IPR is expected by August 2026. Given Motive's arguments there, Motive's proposed construction here appears to be an attempt to avoid Samsara's prior art.

The specification is non-limiting. The specification also does not impose any limitation on how the predictive model may perform its calculations/analysis. Instead, the specification contains exemplary embodiments discussing the predictive model. For example, the specification describes the predictive model as being a convolutional neural network, a deep learning, or other AI model. *See* '580 patent, 1:37-40 ("identifies one or more lines in the video using a predictive model (e.g., a convolutional neural network)"), 5:21-37 ("using a predictive model, such as a deep learning or other AI model . . . a predictive model, such as a CNN or other type of deep learning model"). Nowhere does the specification state that a "predictive model" must use non-geometric calculations, or that geometric calculations are excluded. The patent thus does not limit the meaning of predictive model.

Motive's specification-based arguments all rely on importing limitations from particular embodiments. That is improper. *Hill-Rom Servs., Inc. v. Stryker Corp.*, 755 F.3d 1367, 1371 (Fed. Cir. 2014) ("While we read claims in view of the specification, of which they are a part, we do not read limitations from the embodiments in the specification into the claims."). Motive first points to a passage that discusses how, "in some embodiments," a non-geometric process can be used. Br. at 13 (citing '580 patent, 7:14-16). As the patent makes clear, this approach only applies to "some" embodiments. Motive's expert, likewise, agreed that this portion of the specification relates only to "some embodiments." Znidarsic Tr., 134:13-135:23. Thus, this disclosure does not justify importing Motive's proposed limitation into the meaning of "predictive model."

Motive next relies on language from another portion of the specification, again relating to "some embodiments," but this time discussing capabilities of the model. For example, the specification says in "some embodiments," since the model can be used to predict a horizon line, the requirement to have three lane lines to geometrically calculate a horizon line can be relaxed. '580 patent, 8:29-51. All the specification says is that the three-lane-line requirement "can be relaxed," not that geometric calculations are forbidden. This simply means three lane lines are not a necessity in every instance; it does not mean all geometric calculations are categorically excluded. That the predictive model can in some instances perform predictions without relying on geometric calculations does not mean geometric calculations are prohibited in a "predictive model." Thus,

the specification does not support Motive's proposed construction.

Motive's prosecution history disclaimer argument is wrong. Motive also argues that prosecution history disclaimer supports imposing a negative limitation. Br. at 12. To establish prosecution disclaimer, Federal Circuit "precedent requires that the alleged disavowing actions or statements made during prosecution be both clear and unmistakable"—as Motive's statements regarding "camera parameter" were (*see supra* Section A.ii). *Avid Tech., Inc. v. Harmonic, Inc.*, 812 F.3d 1040, 1045 (Fed. Cir. 2016) (quoting *Omega*, 334 F.3d at 1325-26). Here, however, the portions of the prosecution history relied upon by Motive fall well short of this standard.

The relevant prosecution history is as follows. During prosecution, the examiner rejected the claims under 35 U.S.C. § 103 as obvious over several prior art references, including Kwant1. '580 patent FH, 131-36. In response, the applicants argued that Kwant1 did not use a predictive model to identify the horizon line because it predicts lane lines and then uses geometry to identify the horizon line. *Id.* at 145-46. The applicants also argued that Kwant1 did not disclose camera parameters (as described above) or transmitting an overlaid video to an annotator device for manual review, among other things. *Id.* at 146-48. The examiner then allowed the claims. *Id.* at 164-72.

Motive contends that this history supports its proposed construction. According to Motive, because the examiner rejected the claims over Kwant1 and then allowed the claims after concluding that the claimed features were not found in the prior art, the examiner must have concluded that Kwant1's disclosure of a predictive model (which Motive contends used a geometric approach) did not disclose the claimed predictive model. Br. at 13-14. Motive is wrong.

Motive's argument ignores and omits critical parts of the prosecution history. In particular, Motive omits the examiner's reasons for allowance, which expressly stated that Kwant1 ***disclosed*** the claimed "predictive model," notwithstanding Motive's contention that it used a geometric approach. '580 patent FH, 169-70 ("Prior art was found for the claims as follows: [Kwant1] discloses: . . . 'identifying one or more lines using a predictive model.'"). Thus, contrary to Motive's assertion, the examiner did not conclude that Kwant1's predictive model failed to disclose the patent's claimed "predictive model." Indeed, the examiner concluded the opposite. The examiner allowed the claims not because Kwant1 failed to disclose a predictive model, but because

the examiner withdrew the assertion that Kwant1 disclosed other parts of the claims (like the claimed "camera parameter").

There is thus nothing in the prosecution history that limits predictive models to non-geometric models, and Motive's attempt to import a "non-geometric" negative limitation has no support in the intrinsic record.[6]

D. Order of Steps

i. Claim 1 of the '580 patent

Claim Language	Samsara's Proposed Construction	Motive's Proposed Construction
"[a] receiving, over a network from a camera device, a video comprising a set of image frames; [b] identifying one or more lines in the video using a predictive model, the one or more lines including a horizon line; [c] computing at least one camera parameter based on the one or more lines; [d] overlaying the one or more lines on the video to generate an overlaid video; [e] transmitting the overlaid video to an annotator device for manual review; [f] receiving a confirmation from the annotator device, the confirmation indicating that the one or more lines are accurate; [g] and transmitting data representing the at least one camera parameter to the camera device"	The steps of the claim must be performed in the following order: 1) Step [b] must be performed after step [a] 2) Step [c] must be performed after step [b] 3) Step [d] must be performed after step [b] 4) Step [e] must be performed after step [d] 5) Step [f] must be performed after step [e] 6) Step [g] must be performed after steps [c] and [f]	Plain and ordinary meaning

Although the parties dispute whether this term requires construction, Motive does not actually dispute Samsara's proposed ordering for many of the limitations. Instead, Motive's dispute is limited to one specific order: whether step [g] must be performed after step [f]. *See* Br. at 15-17. Thus, at a minimum, the Court should adopt Samsara's proposed construction for the undisputed

[6] Motive also relies on Mr. Znidarsic's declaration, but the cited paragraphs merely perform a nearly identical examination of the patent and prosecution history to what Motive provides in its argument—which is not the role of a technical expert—without providing any additional explanation or bringing any technical expertise to bear. *See* Br. at 13-14 (citing Znidarsic Decl. ¶¶ 68-74). For the reasons explained in section III.A.ii, Mr. Znidarsic's declaration should be given no weight.

parts of the order of steps. But the Court should adopt Samsara's proposed construction in full because the '580 patent claims an invention that must be performed in a specific order, including that a line used to compute a camera parameter must be confirmed to be accurate (step [f]) ***before*** the camera parameter is transmitted to the camera (step [g]).

The entire point of the '580 patent invention is to accurately calibrate a dashcam installed in a vehicle through human review of the parameters used for calibration. It therefore discloses using an annotator (human reviewer) to confirm the accuracy of a line used to compute camera parameters, and only after doing so, transmitting those parameters to the camera which are then used to calibrate the camera. Any construction permitting transmission of the camera parameters before confirmation of their accuracy would defeat the very purpose of the invention, by allowing the dashcam to be calibrated using inaccurate parameters. *See Mformation Techs., Inc. v. Rsch. in Motion Ltd.*, 764 F.3d 1392, 1398 (Fed. Cir. 2014) ("A claim requires an ordering of steps when the claim language, as a matter of logic or grammar, requires that the steps be performed in the order written, or the specification directly or implicitly requires an order of steps.") (cleaned up).

Samsara's proposed construction recognizes the ordering required by the claim language and the specification, including the purpose of the invention itself. Motive's "plain and ordinary meaning" proposal, by contrast, seeks to allow the claim limitations to be performed in any order—negating the invention's fundamental purpose and contradicting the claims and specification.

The claim language supports Samsara's construction. The claim language reflects the ordered relationship expressed in Samsara's proposed construction. The claim recites an ordered process where a video is received, then a horizon line is identified in the video, then a camera parameter is computed based on the identified line, then the identified line is overlaid on the video to generate an overlaid video, then the overlaid video is transmitted to an annotator device for manual review, then the annotator device confirms the accuracy of the lines which were used to compute the camera parameters, and then data representing the camera parameter is transmitted to the camera device. '580 patent, cl. 1. This is what Samsara's construction captures.

Motive's own expert, Mr. Znidarsic, conceded that the claim language requires most steps to have an order. He agreed that step [b] must be performed after step [a] (Znidarsic Tr., 116:13-

21); steps [c] and [d] must occur after the step [b] (*Id.* at 116:22-117:10); step [e] must follow step [d] (*Id.* at 117:11-21); and that step [f] must occur after step [e] (*Id.* at 117:22-118:4). Mr. Znidarsic (and Motive) take issue only with whether step [g] must occur after step [f]. It must, because the claim recites, and as a matter of logic and common sense requires, receiving confirmation that the lines are accurate before transmitting the camera parameter to the camera device. Step [f] would serve no real purpose if camera parameters were transmitted to the camera regardless of whether they were accurate. *See Rothschild Connected Devices Innovations, LLC v. Coca-Cola Co.*, No. 2024-1253, 2025 WL 2964300, at *2 (Fed. Cir. Oct. 21, 2025) ("We agree with the district court's 'common-sense reading' of this limitation and conclude that the communication module must be configured to perform its steps in the order in which they are written.") (citation omitted); *MyMail, Ltd. v. America Online, Inc.*, 476 F.3d 1372, 1376 (Fed. Cir. 2007) (concluding claims required a user to be authenticated before connecting to the Internet because otherwise the "IDs and passwords described would serve no function"). For each limitation of the claim to have meaning, step [g] must occur after step [f]. *See Merck & Co. v. Teva Pharms. USA, Inc.*, 395 F.3d 1364, 1372 (Fed. Cir. 2005) ("A claim construction that gives meaning to all the terms of the claim is preferred over one that does not do so.").

The specification supports Samsara's construction. The specification also makes clear that the purpose of the claimed invention is to accurately calibrate a monocular camera, which further supports Samsara's proposed construction. *See Medrad, Inc. v. MRI Devices Corp.*, 401 F.3d 1313, 1319 (Fed. Cir. 2005) ("It is therefore entirely proper to consider the functions of an invention in seeking to determine the meaning of particular claim language."). The patent explains that the invention addresses the problem of calibrating a dashboard-mounted camera that must be accurately calibrated to "perform lane detection and distance estimation, respectively, while a camera is in motion." *Id.* at 6:11-14. The invention achieves this purpose by ensuring that camera parameters—used to calibrate the camera—are computed based on accurate information ***before*** they are transmitted to the camera. *Id.* at 1:48-52, 6:1-14, 7:1-10. This makes sense, because if camera parameters were transmitted to the camera before review, the camera would perform critical functions such as lane detection and distance estimation based on potentially inaccurate camera

parameters, undermining the whole point of the invention. *See Maxim Integrated Prods., Inc. v. Silicon Mitus Tech., Inc.*, No. 17-CV-03507 NC, 2018 WL 4657384, at *8 (N.D. Cal. July 3, 2018) (adopting order of steps where defendant argued "to allow the steps to be taken out of order would undermine the purpose of the invention").

Although Motive argues these examples are merely embodiments, Br. at 16-17, there are no embodiments where the camera parameters are transmitted before confirmation—there is not a single disclosure of an unconfirmed camera parameter being sent to the camera and used for calibration. Because it makes no sense to calibrate a dashcam using inaccurate camera parameters, the specification is clear that only camera parameters computed based on accurate information are transmitted to the camera. For example, the specification explains that the process "requests that the human annotator confirm the lane lines (if present) and horizon in the overlaid file," and only "[i]f the annotator confirms the overlaid line," the service "can then transmit the generated camera parameters back to the device." '580 patent, 6:3-11. This same process is repeatedly described throughout the specification. *See id.* at 1:50-52 ("Once the horizon line is confirmed, the system returns the camera parameters to the calling party (e.g., a camera onboard a vehicle)."), 7:1-10 ("[I]f the annotator confirms that the horizon and/or camera parameters are accurate, the annotator device 234 can transmit the camera parameters to the camera initialization service 232 . . . ."). These consistent disclosures further support Samsara's construction. *See Microsoft Corp. v. Multi-Tech. Sys., Inc.*, 357 F.3d 1340, 1347-49 (Fed. Cir. 2004) (limiting claims where specification "repeatedly and consistently describes" systems as possessing a feature); *Mformation*, 764 F.3d at 1400 (affirming order of steps "consistent with the sole embodiment in the specification").

Motive's own statements to the Patent Office support Samsara's construction. Moreover, Motive itself has relied on this ordering when describing the invention. In its IPR response, Motive described "a robust approach to initializing dash-cams in a reliable way" and quoted the '580 patent's specification that "[o]nce the horizon line is confirmed, the system returns the camera parameters." Patent Owner's Resp. (Ex. 11), 3 (quoting '580 patent, 1:36-52); *see also* Dkt. 107 (Second Amended Complaint) ¶ 56 ("To aid in confirmation, the system can then transfer the predicted horizon line (and other lines) to an annotator for confirmation before automatically

adjusting the dashcam parameters based on the automatically determined parameter."). As Motive's submission reflects, transmitting and using potentially inaccurate camera parameters calculated from unconfirmed horizon lines would not lead to robust or reliable camera initialization.

Accordingly, Samsara's proposed order of steps should be adopted.

ii. Claims 1, 8, 15 of the '276 patent

Claim Language	Samsara's Proposed Construction	Motive's Proposed Construction
"[a] receiving an image of a roadway recorded by a camera device installed within a vehicle; [b] detecting a horizon line in the image; [c] overlaying a line on the image to generate an overlaid image; [d] transmitting the overlaid image to a computing device over a network; [e] receiving a modification of the line from the computing device, the modification comprising a new line at a second position; [f] computing a camera parameter based on the new line; [g] and transmitting data representing the camera parameter to the camera device"	The steps of the claim must be performed in the following order: 1) Step [b] must be performed after step [a] 2) Step [c] must be performed after step [b] 3) Step [d] must be performed after step [b] 4) Step [e] must be performed after step [d] 5) Step [f] must be performed after step [e] 6) Step [g] must be performed after steps [c] and [f]	Plain and ordinary meaning

As with the '580 order of steps discussed above, Motive proposes plain and ordinary meaning, asserting that there are no "dependencies" between any of the steps and therefore no order required at all. Br. at 17-19. Tellingly, however, Motive does not attempt to prove its case on any but one specific pair of steps—namely, whether step [c] must be performed after step [b]. Br. at 17-18. Samsara's proposed order should be adopted on all steps; Motive does not substantively dispute the majority of the steps, and Motive is wrong about the one set of steps for which it does put forward an argument.

The claim on its face requires the order recited for each and every step. Despite Motive's assertion that the claims require no order because any "dependencies would have to come from the

language of claim 1" and supposedly "[n]one exists," Motive does nothing to prove that broad assertion—because the claim language is clearly contrary. Br. at 17. For example, step [a] recites "receiving ***an image***," and step [b] then recites "detecting a horizon line ***in the image***." Step [c] then recites "overlaying a line on the image to generate ***an overlaid image***," and step [d] recites "transmitting ***the overlaid image*** to a computing device over a network." The remaining steps proceed accordingly, with each additional step depending on an element recited in the last. Because the order Samsara proposes is required as a matter of antecedent basis and logic, and Motive does not advance any substantive argument on anything other than the relationship between steps [b] and [c], at a minimum the Court should adopt Samsara's proposed order for all the steps Motive does not substantively address.

Steps [b] and [c] are no exception from the rule. As for steps [b] and [c], Samsara's proposed order follows from the claim language, specification, and prosecution history. Motive disputes the order of these two steps by arguing that the line overlaid on the image in step [c] is not necessarily the same line detected in step [b]. In other words, Motive contends that its invention could detect a horizon line, but then overlay, modify, and compute camera parameters based on a completely different line. Motive's position is at odds with the patent and the prosecution history.

The claim language reflects that the method recites a way to compute camera parameters based on the "horizon line" recited in step [b]. '276 patent, cl. 1. If the method were to overlay, transmit, modify, and compute camera parameters based on an entirely different line, the step of "detecting a horizon line in the image" would have no purpose in the claim at all—an interpretation that is clearly wrong. Instead, the "horizon line" of step [b] is the foundation of the entire method, and the correspondence between it and the "line" of step [c] demonstrates the required order. After detecting a horizon line in an image, the claim allows someone to modify it by overlaying "a line" intended to represent the horizon line in further operations. Thus, the horizon line must first be detected in step [b] before "a line" representing it can be overlaid in step [c]. In addition, dependent claim 6 likewise shows that the line overlaid in step [c] is the horizon line. Claim 6 recites "wherein receiving the modification of the line from the computing device comprises receiving an identification of a new horizon line by a user of the computing device." '276 patent, cl. 6. If "the

line" in step [c] were not the horizon line in step [b], then modifying it would not lead to the identification of a "new horizon line."

The specification also makes clear that the horizon line detected in step [b] is the line overlaid in step [c]. '276 patent, 1:48-52 ("After identifying the horizon line . . . [t]he system then overlays the computed horizon line . . . ."); *see also id.* at 5:56-58 ("[P]rocess 206 overlays the computed lane and horizon lines . . . ."). Indeed, there is no disclosure of computing camera parameters without using a horizon line, and no embodiment where the patent detects a horizon line but then does not overlay that horizon line. *See Mformation*, 764 F.3d at 1400. Samsara's construction is also consistent with the purpose of the invention. As Motive itself argued, "[t]he '276 patent tackles a specific technical challenge faced by in-vehicle dashcam systems: detecting and correcting an estimated horizon line." Dkt. 113 (Motive Opp. to MTD) at 13. Under Motive's construction, however, the horizon line is superfluous—and instead an entirely different line can be overlaid and corrected. *Cf. Maxim Integrated Prods*, 2018 WL 4657384, at *8.

Motive's position also contradicts Motive's arguments during prosecution. In response to the examiner finding that Kwant1 disclosed "overlaying a line," Motive argued "Kwant1 never performs any type of visualization ***of the horizon line***." '276 patent FH (Ex. 4), –052-053 (emphasis added). Motive distinguished Kwant1, noting that although it disclosed "annotating," it did not "involve ***'overlaying' the horizon as claimed***." *Id.* at –053 ("Kwant1 does *not* disclose modifying the horizon" (emphasis original)). In response to Motive's arguments, the examiner allowed the claims. *Id.* at –086-095. In essence, Motive argued its claims were patentable because, unlike the prior art, they required overlaying and modifying *the horizon line*. Thus, Samsara's proposed construction should be adopted.

IV. CONCLUSION

For the reasons discussed above, the Court should adopt Samsara's proposed constructions.

DATED: March 26, 2026

Respectfully submitted,

/s/ Josh Krevitt
Josh Krevitt (SBN 208552)
Brian A. Rosenthal (*Pro Hac Vice*)
Katherine Q. Dominguez (*Pro Hac Vice*)
Allen Kathir (*Pro Hac Vice*)
Allyson Parks (*Pro Hac Vice*)
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
Telephone: 212.351.4000
Facsimile: 212.351.4035
JKrevitt@gibsondunn.com
BRosenthal@gibsondunn.com
KDominguez@gibsondunn.com
AKathir@gibsondunn.com
AParks@gibsondunn.com

Jaysen S. Chung (SBN 280708)
GIBSON, DUNN & CRUTCHER LLP
One Embarcadero Center Suite 2600
San Francisco, CA 94111-3715
Telephone: 415.393.8200
Facsimile: 415.393.8306
JSChung@gibsondunn.com

Stuart M. Rosenberg (SBN 239926)
GIBSON, DUNN & CRUTCHER LLP
310 University Avenue
Palo Alto, CA 94301
Telephone: 650.849.5300
Facsimile: 650.849.5333
SRosenberg@gibsondunn.com

Nathaniel R. Scharn (SBN 305836)
GIBSON, DUNN & CRUTCHER LLP
3161 Michelson Drive, Suite 1200
Irvine, CA 92612-4412
Telephone: 949.451.3800
Facsimile: 949.451.4220
NScharn@gibsondunn.com

Hannah L. Bedard (*Pro Hac Vice*)
Wendy Cai (*Pro Hac Vice*)
GIBSON, DUNN & CRUTCHER LLP
1700 M Street, N.W.
Washington, DC 20036-4504
Telephone: 202.955.8500
Facsimile: 202.467.0539
HBedard@gibsondunn.com
WCai@gibsondunn.com

Attorneys for Defendant and Counterclaim Plaintiff Samsara Inc.

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served on March 26, 2026, with a copy of this document via electronic mail.

/s/ Josh Krevitt
Josh Krevitt