

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CEREBRUM SENSOR TECHNOLOGIES,
INC. AND TIRE STICKERS LLC,

Plaintiffs,

v.

REVVO TECHNOLOGIES, INC.,

Defendant.

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C.A. No. 24-245- JLH-SRF

**DEFENDANT REVVO TECHNOLOGIES, INC.'S
PRELIMINARY PROPOSED CLAIM CONSTRUCTIONS**

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Pursuant to the Case Scheduling Order, Defendant Revvo Technologies, Inc. (“Revvo”) hereby serves this document and the attached **Exhibit A** relating to its preliminary proposed claim constructions for U.S. Patent Nos. 10,137,741 (“the ’741 Patent”); 11,124,027 (“the ’027 Patent”), and 11,835,421 (“the ’421 Patent”) (collectively, the “Patents-in-Suit” or “Asserted Patents”). Revvo is prepared to meet and confer with Plaintiffs Cerebrum Sensor Technologies, Inc. and Tire Stickers LLC (“Plaintiffs”) at a mutually agreeable time for the purpose of narrowing the issues and finalizing preparation of a Joint Claim Construction Chart.

The chart attached as Exhibit A identifies Revvo’s preliminary claim constructions and identification of references from the intrinsic evidence (i.e., the specification or prosecution history) that support the proposed construction and designates supporting extrinsic evidence. Revvo also reserves its right to rely on any proposed constructions, portions of the intrinsic evidence (including portions not cited in Exhibit A), and any extrinsic evidence that may be cited by Plaintiffs, as well as additional extrinsic evidence responsive to Plaintiffs’ evidence or proposed constructions. Revvo further reserves its right to rely on any portions of the intrinsic evidence (including portions not cited in Exhibit A) and further extrinsic evidence, to provide a background or summary relating to the asserted patents and the relevant state of the art.

Revvo’s investigation and discovery are ongoing. Revvo reserves the right to modify its preliminary proposed claim constructions as well as to modify, add, or delete terms, phrases, or clauses based on, without limitation, the constructions proposed by Plaintiffs, information learned in the course of meeting and conferring with Plaintiffs’ counsel, information learned through the course of discovery or other means, and any further changes or amendments to the parties’ infringement or invalidity contentions.

Revvo further reserves the right to propose new terms and/or claim constructions as appropriate as revealed as part of the meet-and-confer process. Should Plaintiffs at any point in this case further implicitly adopt or suggest an improper interpretation of a term, phrase, or clause that is not presently subject to claim construction, Revvo also reserves the right to seek the construction of that term, phrase, or clause, and/or to argue that the term is indefinite. Revvo further reserves the right to identify additional intrinsic and extrinsic evidence, including expert testimony, to rebut the proposed constructions and evidence identified by Plaintiffs.

Revvo's preliminary claim constructions shall not act as a waiver of any defense of noninfringement, invalidity, or unenforceability against any claim of the asserted patents. Notwithstanding the preliminary claim constructions contained herein of any term, phrase, or clause, Revvo expressly reserves the right to challenge the validity of any or all claims in the asserted patents on all possible grounds.

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Dated: December 20, 2024

CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2024, true and correct copies of the foregoing document were caused to be served on the following counsel of record as indicated:

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EXHIBIT A

Revvo's Proposed Constructions for Terms in the '741 and '027 Patents

Term	Revvo's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
"layer"	a single thickness of separate and distinct material with sheetlike structure	1:64-67; ¹ 1:67-2:7; 7:51-58; 8:37-42; Figs. 2-7; Figs. 1, 8; <i>passim</i>	layer: 2 a single thickness, coat, fold or stratum (Websters New World College Dictionary, 4th Ed. (2000)) layer: one thickness, course, or fold laid or lying over or under another (www.merriam-webster.com/dictionary/layer) layer: a thickness of some material laid on or spread over a surface (www.dictionary.com/browse-/layer) layer: single thickness of usually some homogeneous substance (vocabulary.com/dictionary/layer) layer: a relatively thin sheetlike expanse or region lying over or under another (vocabulary.com/dictionary/layer) layer: a thin sheet of a substance on top of a surface, or a level of material that is different from the material on either side

¹ All citations are to the specification of the '741 patent.

			(https://dictionary.cambridge.org-us/dictionary/english/layer) layer: a single thickness, coat, fold, or stratum (https://www.collinsdictionary.com-us/dictionary/english/layer) layer: a thickness of some material laid on or spread over a surface (https://www.collinsdictionary.com-us/dictionary/english/layer) layer: a thickness of some homogeneous substance, such as a stratum or a coating on a surface (https://www.collinsdictionary.com-us/dictionary/english/layer) layer: a quantity or sheet of something that lies over a surface or between surfaces (https://www.oxfordlearnersdictionaries.com/us/definition/english/layer_1) Expert declaration testimony
“display layer(s)”/“one or more display layers”	one or more “layers” that include at least one “layer” that has a color and/or pattern and/or shape and/or texture that is visible to an observer	Abstract; 1:67-2:7; 1:67-2:7; 2:16-18; 4:60-64; ; 5:59-64; 8:50-67; 9:8-13; 9:58-66; 10:27-35; Figs. 2-7; <i>passim</i>	See “layer,” above display: to be visible or make something visible (as on the screen of a digital device) (https://www.merriam-webster.com/dictionary/display)

	Indefinite		Expert declaration testimony
“(an) intermediate layer”	a layer interposed between other layers Indefinite	Abstract; 1:67-2:7; 1:67-2:7; 2:16-18; 8:50-67; 9:8-13; 9:58-66; 10:27-35; Figs. 2-7; <i>passim</i>	See “layer,” above Intermediate: being or occurring at the middle place, stage, or degree or between extremes (https://www.merriam-webster.com/dictionary/intermediate) Intermediate: being, situated, or acting between two points, stages, things, persons, etc. (https://www.dictionary.com/browse/intermediate) Intermediate: being between two other related things, levels, or points (https://dictionary.cambridge.org/us/dictionary/english/intermediate) Expert declaration testimony
“(an) adhesive layer”	a layer of an adhesive material (e.g., thermoplastic and thermoset adhesives, heat vulcanizing cements common in retread applications, water-based or solvent based polymer polyurethane based adhesives, and combinations thereof or chemical cements common in retread	Abstract; 1:67-2:7; 1:67-2:7; 2:16-18; 7:3-13; 7:19-29; 8:50-67; 9:8-13; 9:58-66; 10:27-35; 14:30-46; Figs. 2-7; <i>passim</i>	See “layer,” above Expert declaration testimony

	applications, cyanoacrylate, epoxies, rubber-based acrylic pressure sensitive adhesives and combinations thereof		
	Indefinite		
“(an) outer layer”	One or more layers Indefinite	'027 Patent File History: Preliminary Amendment (Feb. 19, 2019) '027 Patent File History: Response to Non-Final Office Action (March 1, 2021)	Expert declaration testimony
“display indicia”/“(a) visual feature”	Any visible color and/or pattern, and/or shape, and/or texture	4:60-5:11; 5:18-24; 5:59-64; 8:1-21	display: to be visible or make something visible (as on the screen of a digital device) (https://www.merriam-webster.com/dictionary/display) visual: visible (https://www.merriam-webster.com/dictionary/visual) Expert declaration testimony
“different from”	not the same	Abstract; 1:60-2:7	different: 2 not the same (Websters New World College Dictionary, 4 th Ed. (2000)) (<i>see also</i> https://www.merriam-webster.com/dictionary/different) different: not the same (https://dictionary.cambridge.org-us/dictionary/english/different)

			different: not the same (https://www.collinsdictionary.com/us/dictionary/english/different) Expert declaration testimony
“vulcanized”/“vulcanized rubber tire”/“vulcanized together”/“vulcanized to”	“vulcanized”: rubber material(s) that has(have) been cured by a heat and/or chemical vulcanization process that forms a network of permanent and irreversible crosslinks that is essentially insoluble in any solvent and is no longer processable vulcanized tire: a rubber tire that has been cured by a heat and/or chemical vulcanization process that forms a network of permanent and irreversible crosslinks that is essentially insoluble in any solvent and no longer processable vulcanized together/to: two rubber materials that have been cured [together/to each other] by a heat and/or chemical vulcanization process that forms a network of permanent and irreversible crosslinks between them that is essentially insoluble in any	Abstract; 1:25-29; 2:8-10; 2:35-39; 2:56-62; 3:5-13; 3:24-32; 4:19-23; 5:36-45; 6:26-30; 6:57-64; 7:3-13; 7:19-29; 14:55-63 <i>passim</i>	Vulcanizate: a vulcanized product (https://www.merriam-webster.com/dictionary/vulcanizate) Vulcanize: to subject to vulcanization (https://www.merriam-webster.com/dictionary/vulcanize) Vulcanization: the process of chemically treating a natural or synthetic polymer and especially rubber to give it useful properties (such as elasticity, strength, and stability) During <i>vulcanization</i>, sulfur is added to rubber and the mixture is heated under pressure to form sulfur cross-links between the rubber's polymer chains. The cross-links increase the strength, stability, and elasticity of the rubber.—Steve Ritter ... <i>vulcanization</i>, the chemical process that converts natural rubber and polymers into durable materials ...

	solvent and no longer processable Otherwise, indefinite.		(https://www.merriam-webster.com/dictionary/vulcanization) vulcanizate: a vulcanized substance. (https://www.collinsdictionary.com/us/dictionary/english/vulcanizate) vulcanize: to subject to vulcanization (https://www.collinsdictionary.com/us/dictionary/english/vulcanize) vulcanization: the process of treating crude rubber with sulfur or its compounds and subjecting it to heat in order to make it nonplastic and increase its strength and elasticity (https://www.collinsdictionary.com/us/dictionary/english/vulcanization) The Science and Technology of Rubber (4th Ed.), Mark, et al., Chapter 7 (Vulcanization). Compounders Pocket Book – Chemicals for the Rubber Industry at 104. Rubber Compounding (1982) – 445 (Vulcanization) U.S. Patent No. 4,256,158 ()
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			Glossary of Rubber and Sealing Terms vulcanization: vulcanizate: the product of vulcanization, a crosslinked rubber article. vulcanization: an irreversible process during which a rubber compound, through a change in its chemical structure (for example, crosslinking), becomes less plastic and more resistant to swelling by organic liquids, while elastic properties are conferred, improved, or extended over a greater range of temperature. (https://rahco-rubber.com/resources/glossary-of-rubber-and-sealing-terms/) https://en.wikipedia.org/wiki/Vulcanization Expert declaration testimony
“the one or more display layers and the intermediate layer are vulcanized together”/“the intermediate layer is vulcanized to at least one of the one or more display layers”	the one or more display layers and the intermediate layer have been cured together by a heat and/or chemical vulcanization process that forms a network of permanent and irreversible crosslinks between them that is	See “vulcanized”/ “vulcanized together”	See “vulcanized”/ “vulcanized together” Expert declaration testimony

	essentially insoluble in any solvent and no longer processable; otherwise, indefinite		
“before attachment with the vulcanized rubber article”/“before attachment to the vulcanized rubber article”	A method step within apparatus/composition/system claim 1 and 19 (and dependent claims therefrom), rendering them invalid for indefiniteness.	8:43-49 '741 Patent File History: Response to Non-Final Office Action (July 5, 2018)	attached: connected or joined to something (https://www.merriam-webster.com/dictionary/attached) attached: joined; connected; bound (https://www.dictionary.com/browse/attached) attach: to fasten, join, or connect something (https://dictionary.cambridge.org/us/dictionary/english/attach) Expert declaration testimony
“direct contact”	nothing interposed between two surfaces that are touching each other	6:9-11; 8:50-67; Fig. 2; Fig. 4A; Figs 2-7 '741 Patent File History: Response to Non-Final Office Action (July 5, 2018)	direct: 3 with nothing or no one between (Websters New World College Dictionary, 4 th Ed. (2000)) direct: without anything or anyone else being involved or in between (dictionary.cambridge.org-us/dictionary/english/direct) direct: with nothing or no one between (www.collinsdictionary.com-us/dictionary/english/direct)

			contact: “union or junction of surfaces” (www.merriam-webster.com/dictionary/contact) contact: “the fact of two people or things touching each other” (dictionary.cambridge.org/us/dictionary/english/contact) contact: “the act or state of touching” (www.dictionary.com/browse/contact) Expert declaration testimony
“the intermediate layer is in direct contact with at least one or more of the display layers”/“(an) adhesive layer in direct contact with an underside surface of the intermediate layer”	The intermediate layer is touching the at least one or more of the display layers with no other layer interposed between them/ The adhesive layer is touching the underside surface of the intermediate layer with no other layer interposed between them	See “direct contact” above	See “direct contact” above Expert declaration testimony
“a material capable of [forming a chemical bond/chemically bonding] with a surface of the vulcanized rubber article [at ambient temperature conditions]”	An adhesive material that is itself capable of forming a chemical bond or being vulcanized to the surface of the vulcanized rubber article under elevated temperature conditions (e.g., heat-activated adhesives such as thermoplastic and thermoset adhesives, heat vulcanizing cements common	7:3-13; 7:19-29; 14:30-46 '741 Patent File History: Response to Non-Final Office Action (July 5, 2018)	Expert declaration testimony

	in retread applications, water-based or solvent based polymer polyurethane based adhesives, and combinations thereof) or at ambient temperature conditions without being heat activated (e.g., chemical cements common in retread applications, cyanoacrylate, epoxies, rubber-based acrylic pressure sensitive adhesives and combinations thereof) [at ambient temperature: conditions]: an adhesive material that is itself capable of forming the desired chemical bond or being vulcanized to a surface of the vulcanized rubber article without being heat activated (e.g., chemical cements common in retread applications, cyanoacrylate, epoxies, rubber-based acrylic pressure sensitive adhesives and combinations thereof)		
“an adhesive layer forming a chemical bond . . . wherein the chemical bond is formed at ambient temperature conditions”	a layer of material that itself activates and forms a chemical bond with or is vulcanized to a surface of the vulcanized rubber article without being	See “adhesive layer,” above	Expert declaration testimony

	heat activated (e.g., chemical cements common in retread applications, cyanoacrylate, epoxies, rubber-based acrylic pressure sensitive adhesives and combinations thereof)		
“beneath”/“beneath the one or more display layers”/“beneath the outer layer”	Underneath (not within) Underneath (not within) the one or more display layers Underneath (not within) the outer layer	2:11-16; 9:58-66; 11:45-12:5; Fig. 7	Beneath: underneath, below (https://www.dictionary.com/browse/beneath) Expert declaration testimony
“adhesive material”	A material that itself activates and forms chemical bonds by being heat-activated (e.g., thermoplastic and thermoset adhesives, heat vulcanizing cements common in retread applications, water-based or solvent based polymer polyurethane based adhesives, and combinations thereof) or chemically-activated (e.g., chemical cements common in retread applications, cyanoacrylate, epoxies, rubber-based acrylic pressure sensitive adhesives and combinations thereof)	7:3-13; 7:19-29; 14:30-46	Expert declaration testimony
“display assembly”/“(an) assembly”/“(the) assembly”	Preambles reciting these terms are limiting.	Abstract; 1:15-16; 1:43-53; 1:60-2:7; 1:67-2:7; 2:16-18; 2:23-43; 2:53-	Expert declaration testimony

	“display assembly”: a layered composite with sheetlike structure for attaching to a vulcanized rubber article that has a color and/or pattern, and or shape, and/or texture visible to an observer; otherwise, indefinite “assembly”: a layered composite with sheetlike structure for attaching to a vulcanized rubber article; otherwise, indefinite	3:55; 3:59-4:16; 4:60-64; 5:18-24; 5:59-64; 8:1-21; 8:50-67; 9:8-13; 9:58-66; 10:27-35; Figs. 1-8; <i>passim</i>	
“adhered”/“adhered to an interface surface of the outer layer”	“adhered” - no construction necessary “adhered to an interface surface of the outer layer” – indefinite	See “outer layer,” above	Expert declaration testimony
“(a) barrier material composition”/“(a) material composition that acts as a barrier”	a material composition that blocks or is intended to block passage of discoloring chemicals, particularly antioxidants, within rubber articles and distinct from the compositions of the “display layer” (e.g., vulcanized rubber, natural rubber, SBR, nitrile rubber, neoprene rubber . . . and combinations thereof) or	5:64-6:4; 6:31-56; 7:51-58; 8:37-42	barrier: something material that blocks or is intended to block passage (https://www.merriam-webster.com/dictionary/barrier) <i>E.g.</i>, U.S. Patent No. 5,300,164 at 4:25-30 Expert declaration testimony

	as used generally in rubber tires that do not and are not intended to block passage of such chemicals; otherwise, indefinite		
“at least a portion”/“at least a portion of the outer layer adjacent the interface surface”	“at least a portion” means a part or all “at least a portion of the outer layer adjacent the interface surface” means a part or all of the outer layer adjacent the interface surface; indefinite	6:9-17; 7:59-63	Portion: a part or share of something larger (https://dictionary.cambridge.org-us/dictionary/english/portion) Expert declaration testimony
“bonds”/“bonding”	“chemically bonds”/“chemical bonding”	7:3-13; 7:19-29; 14:30-46	Expert declaration testimony
“elastomeric material”	No construction necessary; plain meaning (a rubber or rubber-like composition of substances)		material: the substance or substances of which a thing is made or composed (https://www.dictionary.com/browse/material) elastomer: any of various elastic substances resembling rubber (https://www.merriam-webster.com/dictionary/elastomer) (elastomer, any rubbery material composed of long chainlike molecules, or polymers, that are capable of recovering their original shape after being stretched to great extents—hence the name elastomer, from “elastic polymer.” https://www.britannica.com/science/elastomer)

“cavity”	a hollow or unfilled space		cavity: a hole or hollow space (Websters New World College Dictionary, 4 th Ed. (2000)) cavity: an unfilled space within a mass (https://www.merriam-webster.com/dictionary/cavity)
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Revvo's Proposed Constructions for Terms in the '421 Patent

Term	Revvo's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
“(a) housing”	a casing that surrounds the sensor device and constructed to provide an internal cavity that is configured with surface features that mechanically fix and retain the placement position of the sensor device and does not use or require the use of any coating or filling agents or materials to fix and retain the placement position of the electrical sensor device therein	12:41-60; 13:46-14:11; 4:4-9; 6:49-55; 10:33-46; 11:34-49; 11:50-12:4; 12:5-40; 12:61-13:9; Figs. 3, 5-10; <i>passim</i> '421 Patent File History: Response to Non-Final Office Action (May 23, 2023)	housing: a case or covering that surrounds a machine or part of a machine https://dictionary.cambridge.org-us/dictionary/english/housing housing: a case or enclosure (as for a mechanical part or an instrument) https://www.merriam-webster.com/dictionary/housing housing: a fully enclosed case and support for a mechanism. https://www.dictionary.com/browse/housing housing: a fully enclosed case and support for a mechanism https://www.collinsdictionary.com-us/dictionary/english/housing https://en.wikipedia.org/wiki/Potting_(electronics) Expert declaration testimony

“internal cavity”	“a hollow or unfilled space surrounded by and inside (the housing)” Indefinite	Abstract; 4:4-13; 4:14-33; 10:33-46; 10:47-59; 11:34-49; 11:50-12:4; 12:5-40; 12:41-60; 12:61-13:9; 13:10-14; 13:46-14:11; 14:12-40; 14:41-54; Figs. 1-3, 5-10; <i>passim</i>	Internal: existing or situated within the limits or surface of something (https://www.merriam-webster.com/dictionary/internal) internal: of or having to do with the inside; inner (Websters New World College Dictionary, 4th Ed. (2000)) internal – inside an object or building (https://dictionary.cambridge.org-us/dictionary/english/internal) cavity: a hole or hollow space (Websters New World College Dictionary, 4th Ed. (2000)) cavity: an unfilled space within a mass (https://www.merriam-webster.com/dictionary/cavity) Expert declaration testimony
“enclosed”/“enclosed within the housing”	“enclosed” – surrounded on all sides “enclosed within the housing”: surrounded on all sides by the housing	4:4-14; 10:47-59;	enclosed: “Things that are enclosed are surrounded on all sides, closed or penned in.” (https://www.vocabulary.com-dictionary/enclosed) enclose: to surround something; to surround

			(https://dictionary.cambridge.org-us/dictionary/english/enclose) enclose: to shut in all around; surround (Websters New World College Dictionary, 4th Ed. (2000)) enclose: to close in: surround (https://www.merriam-webster.com/dictionary/enclose) enclose: If a place or object is enclosed by something, the place or object is inside that thing or completely surrounded by it. (https://www.collinsdictionary.com-us/dictionary/english/enclose) Expert declaration testimony
“a housing comprising . . . an internal cavity that is enclosed within the housing”	a casing that surrounds and defines a hollow space inside the casing that has been constructed with surface features that mechanically fix and retain the placement position of the sensor device and does not use or require the use of any coating or filling agents or materials to fix and retain the placement position of the electrical sensor device therein	See “housing,” “internal cavity,” and “enclosed within the housing,” above	See “housing,” “internal cavity,” and “enclosed within the housing,” above Expert declaration testimony

	Indefinite		
“an electrical sensor device that is disposed within the internal cavity and attached therein to prevent movement of the device within the internal cavity”	an electrical sensor device disposed within the “internal cavity” and connected therein by surface features that prevent movement of the sensor device within the internal cavity and does not use or require the use of any coating or filling agents or materials to fix and retain the placement position of the electrical sensor device therein	See “housing,” “internal cavity,” above; 12:41-60; 13:46-14:11; 4:4-9; 6:49-55; 10:33-46; 11:34-49; 11:50-12:4; 12:5-40; 12:61-13:9; Figs. 3, 5-10; <i>passim</i>	See “housing,” “internal cavity,” above. attached: connected or joined to something (https://www.merriam-webster.com/dictionary/attached) attached: joined; connected; bound (https://www.dictionary.com/browse/attached) attach: to fasten, join, or connect something (https://dictionary.cambridge.org-us/dictionary/english/attach)
“(wherein) the electrical sensor device is attached within the internal cavity by one or more surface features within the cavity that contact the electrical sensor device to retain its position therein”/“the electrical sensor device is attached in place within the internal cavity by contact between the electrical sensor device and one or more surface features in the internal cavity”	the electrical sensor device is attached within the internal cavity to one or more surface features within the cavity that contact the electrical sensor device to retain its position therein and does not use or require the use of any coating or filling agents or materials to fix and retain the placement position of the electrical sensor device therein / the electrical sensor device is attached in place within the internal cavity by contact between the electrical sensor device and one or	See “housing,” “internal cavity,” above; 12:41-60; 13:46-14:11; 4:4-9; 6:49-55; 10:33-46; 11:34-49; 11:50-12:4; 12:5-40; 12:61-13:9; Figs. 3, 5-10; <i>passim</i>	See “housing,” “internal cavity,” above. attached: connected or joined to something (https://www.merriam-webster.com/dictionary/attached) attached: joined; connected; bound (https://www.dictionary.com/browse/attached) attach: to fasten, join, or connect something (https://dictionary.cambridge.org-us/dictionary/english/attach) Expert declaration testimony

	more surface features in the internal cavity and does not use or require the use of any coating or filling agents or materials to fix and retain the placement position of the electrical sensor device therein		
“unfilled open space[s]”	indefinite		unfilled: not filled https://www.merriam-webster.com/dictionary/unfilled An <i>opening</i> is an empty space. https://www.vocabulary.com/dictionary/opening opening: a hole or empty space that you can go through https://www.vocabulary.com/dictionary/opening Expert declaration testimony
“an unfilled open space above or below the electrical sensor device”/“(wherein) the internal cavity comprises an unfilled open space above or below the electrical sensor device in the housing”	indefinite (wherein) the “internal cavity” includes an “unfilled open space” directly above and below the electrical sensor device in the housing	4:14-33; 14:12-54; <i>see also</i> “internal cavity” and “housing,” above ’421 Patent File History: Response to Non-Final Office Action (May 23, 2023)	See “internal cavity” and “housing,” above Expert declaration testimony

“(a) retaining member”	indefinite; construed under 35 U.S.C. §112(f) function: (claim 1) to accommodate attachment of the housing therewith and for attachment to rotate with the object when the object is rotated in use function (claim 28): for attaching with a surface of the object or an element connected with the object to rotate with the object in use and to accommodate placement a portion of the housing therein to provide an attachment between the housing and the retaining member function (claim 41): to accommodate attachment with the housing by mechanical or bonding technique and for connecting with the object before or after formation of the object structure: insufficient corresponding structure for the full scope of the claimed	Abstract; 6:4-7:21; 11:24-33; <i>passim</i>	member: a part of a whole (https://www.merriam-webster.com/dictionary/member) Expert declaration testimony
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	functions and therefore indefinite		
“(wherein) the retaining member has an outside surface configured for attachment (to rotate with the object)”	<i>See</i> “retaining member,” above (wherein) the “retaining member” has an outside surface that connects it to the object that rotates	<i>See</i> “retaining member,” above	<i>See</i> “retaining member,” above attached: connected or joined to something (https://www.merriam-webster.com/dictionary/attached) attached: joined; connected; bound (https://www.dictionary.com/browse/attached) attach: to fasten, join, or connect something (https://dictionary.cambridge.org/us/dictionary/english/attach) Expert declaration testimony
“(a) wall structure”/“the housing comprises a wall structure”	a structure resembling a wall/the “housing” includes a structure resembling a wall	4:7-13; 4:17-20; 6:15-22	wall: a material layer enclosing space (the <i>wall</i> of a container); something resembling a wall (https://www.merriam-webster.com/dictionary/wall)
“(wherein) the housing includes an opening through the outside surface to the internal cavity”/“(wherein) the housing comprises an opening extending from an outer surface of the housing to the internal cavity”	Indefinite	4:14-33; 14:12-54; <i>see also</i> “internal cavity” and “housing,” above ’421 Patent File History: Response to Non-Final Office Action (May 23, 2023)	<i>See</i> “internal cavity” and “housing,” above Expert declaration testimony

“(wherein) the housing . . . further includes a filter that is positioned to filter air passing into the internal cavity before reaching the electrical sensor device”	Indefinite The “housing” structure includes a filter therein that is positioned to filter air passing into the internal cavity before reaching the electrical sensor device	4:14-33; 14:12-54; <i>see also</i> “internal cavity” and “housing,” above '421 Patent File History: Response to Non-Final Office Action (May 23, 2023)	See “internal cavity” and “housing,” above Expert declaration testimony
“an element attached with the tire that rotates with the tire”	Any part that is attached with and rotates with the tire	Abstract; 1:14-21; 3:65-4:1; <i>passim</i>	element: a part of something (https://dictionary.cambridge.org-us/dictionary/english/element)
“fixed”/“having a fixed placement”	Securely fastened in place and not moving or able to be moved/ having a securely fastened placement and not moving or able to be moved		fixed: securely placed or fastened : stationary (https://www.merriam-webster.com/dictionary/fixed) fixed: firmly placed or attached; not movable (https://www.collinsdictionary.com-us/dictionary/english/fixed) fixed: not moving or able to be moved from its position (https://dictionary.cambridge.org-us/dictionary/english/fixed) fixed: fastened, attached, or placed so as to be firm and not readily movable; definitely and permanently placed (https://www.dictionary.com-browse/fixed)

			“Something <i>fixed</i> is rigidly set or placed... Anything described as fixed is unchangeable.” https://www.vocabulary.com/dictionary/fixed Expert declaration testimony
“installing”/“installing an electrical sensor device within the internal cavity of a housing”	The step of installing is not completed until the electrical sensor device is mechanically fixed and retained in place within the “internal cavity” of the “housing” otherwise, indefinite	6:49-55; <i>see also</i> “internal cavity” and “housing,” above	install: to set up for use or service https://www.merriam-webster.com/dictionary/install install: to put something in place so that it is ready for use https://dictionary.cambridge.org/us/dictionary/english/installing Expert declaration testimony
“the housing includes an outer structure that defines the internal cavity”	Indefinite	4:14-33; 10:13-32; 14:12-54; <i>see also</i> “internal cavity” and “housing,” above	outer: situated or belonging on the outside (https://www.merriam-webster.com/dictionary/outer) outer: on the outside, or at a greater distance from the center or inside https://dictionary.cambridge.org/us/dictionary/english/outer Expert declaration testimony
“display feature”/“a display feature that is positioned on the housing”	a feature that is viewable by a user/a feature on the “housing” that is viewable to a user	6:19-22; 7:4-6; 9:38-56; 9:57-64; 9:65-10:12	display: a setting or presentation of something in open view

			https://www.merriam-webster.com/dictionary/display Expert declaration testimony
“the housing is positioned relative to the retaining member according to a display feature that is positioned on the housing”	the housing is positioned relative to the retaining member according to a feature on the “housing” that is viewable to a user	<i>See</i> “display feature” above	<i>See</i> “display feature” above Expert declaration testimony
“surface feature[s]”	feature(s) of a surface	4:14-33; 11:34-49; 11:50-12:4; 12:5-40; 13:46-14:11	Expert declaration testimony