

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CEREBRUM SENSOR TECHNOLOGIES, INC. and TIRE STICKERS LLC,	)	
	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 24-245 (JLH) (SRF)
	)	
REVVO TECHNOLOGIES, INC.,	)	HIGHLY CONFIDENTIAL – UNDER
	)	PROTECTIVE ORDER
Defendant.	)	

**CEREBRUM SENSOR TECHNOLOGIES, INC. AND TIRE
STICKERS LLC’S SUPPLEMENTAL INITIAL INFRINGEMENT CONTENTIONS**

Under paragraph 6(c) of the Scheduling Order, Plaintiffs Cerebrum Sensor Technologies, Inc. (“Cerebrum”) and Tire Stickers LLC (“Tire Stickers”) (collectively, “Plaintiffs” or “Cerebrum”) provides its supplemental initial claim charts (“Supplemental Initial Infringement Contentions”) to Defendant Revvo Technology, Inc. (“Defendant” or “Revvo”). These Supplemental Initial Infringement Contentions herein incorporate by reference as though fully set forth herein each of the charts and contentions served on October 30, 2024. Additionally, these Supplemental Initial Infringement Contentions include claim 10 of U.S. Patent No. 11,835,421.

Cerebrum provides these contentions based on information reasonably and currently available to it through publicly available information and Defendant’s production of core technical documents. Cerebrum has not yet received complete production from Revvo in response to its Rule 34 requests and the parties have met and conferred and are meeting and conferring on Revvo’s discovery deficiencies. Given the early stage of discovery, Cerebrum therefore reserves its right to modify, amend, retract and/or supplement the disclosures made herein as additional evidence and information becomes available or as is otherwise appropriate, consistent with the Federal Rules of Civil Procedure, the Local Rules, this Court’s procedures, and the Scheduling Order. Cerebrum

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further reserves the right to amend, retract, and/or supplement its Initial Infringement Contentions. Cerebrum's Initial Infringement Contentions are being provided before claim construction disclosure and discovery, and before the Court's claim construction ruling. Cerebrum's disclosures are not an admission, adoption, or waiver of any particular claim construction; Cerebrum reserves all rights with respect to claim construction.

As set forth in the Complaint, Cerebrum contends that Revvo has directly infringed, directly infringes, has indirectly infringed, or indirectly infringes, contributorily and/or by inducement, one or more claims of U.S. Patent No. 10,137,741 ("the '741 Patent"); U.S. Patent No. 11,124,027 ("the '027 Patent"); and U.S. Patent No. 11,835,421 ("the '421 Patent") (collectively, "the Asserted Patents" or "Patents-in-Suit").

Cerebrum further contends that Revvo's infringement of the Patents-in-Suit is willful.

The following table identifies the Asserted Claims of the Asserted Patents (including but not limited to the additionally asserted claim 10 of the '421 Patent):

'741 Patent	'027 Patent	'421 Patent
Claims 1, 4, 7–9, 11, 12, 19	Claims 1, 5, 7–9, 11–13, 15–22	Claims 1, 2, 5, 7–9, 10 , 11, 12, 20–24, 28, 31–34, 41, 43, 44, 48, 50–53

The following table identifies the Accused Products:

'741 Patent	'027 Patent	'421 Patent
Accused Revvo Tire Sensor Products (and vulcanizing fluid as identified in the chart)	Accused Revvo Tire Sensor Products (and vulcanizing fluid as identified in the chart)	Accused Revvo Tire Sensor Products (and receivers as identified in the chart) Accused Revvo Wheel Sensor Products (and receivers as identified in the chart)

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As set forth in the Complaint, **Exhibit 1** is an initial claim chart – served on October 30, 2024 – showing how the Accused Products meet each limitation of claims of the '741 Patent. To the extent that any claim element is not literally embodied in the Accused Products, the Accused Products embody such claim elements under the doctrine of equivalents because any difference between the claim elements and the Accused Products are insubstantial, and/or the Accused Products contain features or functionalities that perform substantially the same function, in substantially the same way, to achieve substantially the same result as the claim element recited in the '741 Patent.

As set forth in the Complaint, **Exhibit 2** is an initial claim chart – served on October 30, 2024 – showing how the Accused Products meet each limitation of claims of the '027 Patent. To the extent that any claim element is not literally embodied in the Accused Products, the Accused Products embody such claim elements under the doctrine of equivalents because any difference between the claim elements and the Accused Products are insubstantial, and/or the Accused Products contain features or functionalities that perform substantially the same function, in substantially the same way, to achieve substantially the same result as the claim element recited in the '027 Patent.

As set forth in the Complaint, **Exhibit 3** is a supplemental initial claim chart showing how the Accused Products meet each limitation of claims of the '421 Patent. To the extent that any claim element is not literally embodied in the Accused Products, the Accused Products embody such claim elements under the doctrine of equivalents because any difference between the claim elements and the Accused Products are insubstantial, and/or the Accused Products contain features or functionalities that perform substantially the same function, in substantially the same way, to achieve substantially the same result as the claim element recited in the '421 Patent.

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Exhibits 1-3 are based on information that Cerebrum has at this stage of the litigation. Cerebrum reserves the right to supplement these exhibits as more information becomes available to Cerebrum through discovery, including in response to document production and depositions, and Revvo's non-infringement contentions. These exhibits include citations to certain illustrative supporting evidence. This evidence is merely exemplary and intended to provide notice of where each element of the asserted claims may be found in the Accused Products and how the Accused Products infringed or infringe the asserted claims. Cerebrum reserves the right to rely on additional evidence to support its infringement contentions.

Cerebrum expressly reserves the right to amend, supplement, or otherwise modify this disclosure as additional information becomes available during discovery and as further investigation and analysis is performed. Specifically, Cerebrum reserves the right to: (1) add additional or different support for the contentions in the attached claim charts; (2) identify additional accused products; (3) add contentions that one or more claim limitations is met under the doctrine of equivalents for the Accused Products or additional accused products later identified; and (4) assert additional patent claims that are not included in the attached claim chart.

Additionally, since claim construction has not occurred, Cerebrum reserves the right to supplement these initial infringement contentions based on the constructions advanced and/or agreed upon by the parties or adopted by the Court.

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CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2024, copies of the foregoing were caused to be served upon the following in the manner indicated:

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