

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.,	)	
	)	
Defendant.	)	

JOINT CLAIM CONSTRUCTION CHART

Pursuant to Paragraph 8 of the Scheduling Order (D.I. 38), the parties hereby submit their Joint Claim Construction Chart (Ex. A) for claim construction proceedings for 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”).¹

The Joint Claim Construction Chart identifies the disputed claim terms and the parties’ proposed constructions of those terms and supporting intrinsic evidence. Citations to patent column and line numbers are in column:line format. Each citation to a figure incorporates by reference, as if fully set out herein, any associated description or discussion of the figure. Similarly,

¹ The Joint Claim Construction Chart at Exhibit A includes the terms for which the parties have met-and-conferred and identified for claim construction at this stage of the case. Exhibit B to this joint submission includes additional terms that Revvo had identified as being in dispute between the parties and subject to construction if necessary after Plaintiffs reduce their number of asserted claims from the presently asserted 50+ claims to 18 asserted claims pursuant to the case schedule. *See, e.g., O2 Micro Int’l Ltd. v. Beyond Innovation Tech. Co.*, 521 F.3d 1351, 1362 (Fed. Cir. 2008) (“When the parties present a fundamental dispute regarding the scope of a claim term, it is the court’s duty to resolve it.”).

each citation to a description or discussion of any figure incorporates by reference each figure described or discussed as if fully set out herein.

Each party reserves the right to rely on other portions of the intrinsic record, including to refute positions taken by the other party during the Markman proceedings.

The citation to any portion of the intrinsic record is not to be construed as an admission by that party that the cited portion defines the term. Moreover, the parties further agree that any party may argue that the cited portions are exemplary, and thus indicate that no special definition governs, and that the ordinary meaning should thus govern.

Additionally, each party reserves the right to assert that its proposed construction is supported by the ordinary meaning of the term, and to introduce extrinsic evidence to the extent the Court permits such evidence.

The following exhibits are attached:

Exhibit	Description
Exhibit A	Joint Claim Construction Chart (terms 1-13): Cerebrum's five proposed terms for construction: terms 4, 5, 6, 12, and 13; ² Revvo's proposed terms for construction: terms 1-3, 7-11
Exhibit B	Revvo's reserved terms for construction chart ³
Exhibit C	U.S. Patent No. 10,137,741 ("the '741 Patent")
Exhibit D	U.S. Patent No. 11,124,027 ("the '027 Patent")
Exhibit E	U.S. Patent No. 11,835,421 ("the '421 Patent")

² Cerebrum reserves all rights with regard to Revvo's list of claim terms exceeding five claim terms, despite Cerebrum's requests that each side limit their lists to five claim terms each.

³ Cerebrum has proposed plain and ordinary meaning claim constructions for the terms in Exhibit B that the parties discussed on January 21, 2025 pursuant to the Court's Order (D.I. 82). Cerebrum reserves the right to propose plain and ordinary meaning claim constructions for those remaining terms reserved by Revvo to the extent such a submission becomes necessary. Revvo reserves all rights for Cerebrum's decision to withhold its claim construction positions for these terms.

Exhibit	Description
Exhibit F	Response to Non-Final Office Action dated July 5, 2018 ('741 Patent)
Exhibit G	U.S. Patent No. 5,300,164 (DeTrano) (cited in Exhibit F and Exhibit H) ⁴
Exhibit H	Response to Non-Final Office Action dated March 1, 2021 ('027 Patent)
Exhibit I	Response to Non-Final Office Action dated May 23, 2023 ('421 Patent)
Exhibit J	U.S. Publication 2019/0184773 (Saito) (cited in Exhibit I) ²

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⁴ Revvo objects to Plaintiffs inclusion of third-party patents as attachments to this joint submission and further reserves the right to submit its own extrinsic evidence in support of its proposed claim construction positions.

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