

**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
PROPOSED TERMS FOR CONSTRUCTION**

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Pursuant to the Case Scheduling Order, Defendant Revvo Technologies, Inc. (“Revvo”) hereby provides the following list of proposed terms for construction from within the asserted claims of the 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”).

Terms proposed for construction within the asserted claims of the ’741 and ’027 patents:

- “layer(s)”
- “display layer(s)”
- “one or more display layers”
- “(an) intermediate layer”
- “(an) adhesive layer”
- “(an) outer layer”
- “display indicia”
- “different from”
- “an elastomeric material that is different from that of the one or more display layers”
- “vulcanized”
- “vulcanized rubber article”
- “vulcanized rubber tire”
- “vulcanized together”/“vulcanized to”
- “before attachment with the vulcanized rubber article”/“before attachment to the vulcanized rubber article”
- “(wherein) the one or more display layers and the intermediate layer are vulcanized together before attachment with the vulcanized rubber article”/ “an intermediate layer . . . vulcanized to at least one of the one or more display layers prior to attachment to the target surface”
- “(wherein) the intermediate layer is vulcanized to at least one of the one or more display layers before attachment to the vulcanized rubber article”/”
- “direct contact with”
- “adhesive layer in direct contact with an underside surface of the intermediate layer”
- “chemical bond”/“chemically bonds”
- “a material capable forming a chemical bond”
- “a material capable forming a chemical bond with a surface of the vulcanized rubber article at ambient temperature conditions”
- “cavity”
- “an element”
- “beneath the one or more display layers”/“beneath the outer layer”
- “the cavity is disposed beneath the one or more display layers”/“the cavity is disposed beneath the outer layer”
- “adhesive material”

- “display assembly”
- “attaching a display assembly to a surface of a vulcanized rubber article”
- “placing a display assembly into contact with the surface”/ “placing an assembly into contact with the identified surface”
- “a target surface disposed along a portion of the rubber tire”
- “a display assembly disposed onto the target surface”
- “an adhesive layer forming a chemical bond . . . wherein the chemical bond is formed at ambient temperature conditions”
- “assembly”
- “(a) visual feature”
- “adhered”
- “adhered to an interface surface of the outer layer”
- “(a) barrier material composition”
- “at least a portion”
- “at least a portion of the outer layer adjacent the interface surface”
- “material constituent”
- “impairs migration”/“mitigate migration”
- “an adhesive layer interposed between the identified surface and the assembly”
- “(wherein) the outer layer is in contact with an adhesive layer interposed between the identified surface and the assembly that bonds the assembly to the vulcanized rubber article,”
- “bonds”/“bonding”
- “an adhesive layer . . . that bonds the assembly to the vulcanized rubber article”
- “material from the vulcanized rubber article”
- “a barrier to material migrating from the vulcanized rubber article”
- “the adhesive layer is connected with the outer layer”
- “an indicia”
- “the outer layer includes an indicia along an outer surface”

Terms proposed for construction within the asserted claims of the '421 patent:

- “(a) housing”
- “internal”
- “internal cavity”
- “enclosed”
- “enclosed within the housing”
- “an internal cavity that is enclosed within the housing”
- “a housing comprising an outer surface and an internal cavity that is enclosed within the housing”
- “an electrical sensor device”
- “attached”
- “attached therein to prevent movement of the device within the internal cavity”

- “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 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”
- “(a) retaining member”
- “(wherein) the retaining member has an outside surface configured for attachment”
- “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 within the internal cavity by one or more surface features within the cavity”
- “(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”
- “(a) wall structure”
- “(a) wall structure that surrounds the internal cavity”
- “the housing comprises a wall structure”
- “(wherein) the housing includes an opening through the outside surface to the internal cavity”
- “(wherein) the housing . . . further includes a filter that is positioned to filter air passing into the internal cavity before reaching the electrical sensor device”
- “(wherein) the housing . . . further includes a filter that is positioned to filter air passing into the internal cavity before reaching the electrical sensor device”
- “an element attached with the tire that rotates with the tire”
- “a housing comprising an outer structure that defines an open internal cavity therein”
- “fixed”
- “having a fixed placement”
- “an electrical sensor device disposed within the internal cavity and having a fixed placement therein by one or more surface features of the housing configured to contact the electrical sensor device”
- “an internal cavity of a
- “installing”
- “installing an electrical sensor device with the internal cavity of a housing”
- “the housing includes an outer structure that defines the internal cavity”
- “the housing comprises an opening extending from an outer surface of the housing to the internal cavity”
- “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”
- “display feature”
- “a display feature that is positioned on the housing”
- “the housing is positioned relative to the retaining member according to a display feature that is positioned on the housing”

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CERTIFICATE OF SERVICE

I hereby certify that on December 6, 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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