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**To:** [Riccio, Nicole](#); [Rader, Michael](#); [Luster, Meghan P.](#); [Sayour, Tonia A.](#); [WGS-HydraFacialvAMP](#)  
**Cc:** [Vorder-Bruegge, Mark](#); [Lubozynski, Matt](#); [Mansberg Weintraub, Emma](#); [Razai, Ali](#); [Everton, Benjamin](#); [Boettcher, Christian](#); [Kirby, Juliana](#); [MLB-HydraFacial v AMP](#)  
**Subject:** Final Claim Construction Chart  
**Date:** Thursday, December 18, 2025 5:47:19 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.jpg](#)  
[2025-12-18 Final Claim Construction Chart.pdf](#)

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Counsel,

Please find attached service copy of 2025-12-18 Final Claim Construction Chart.

Best regards,

**Vanessa Green**

Legal Administrative Specialist

Pronouns: She/Her/Hers

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| Claim term             | Applicable Claim(s)      | Construction                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Intrinsic/Extrinsic Evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| “fluid control member” | ’287 Patent:<br>Claim 11 | <p>Subject to 35 U.S.C. §112(6)</p> <p><b><u>Function:</u></b><br/> “be in fluid communication with at least a first container and a second container”<br/> and<br/> “be in fluid communication with the handpiece assembly”</p> <p><b><u>Structure:</u></b><br/> “manifold system 24” (’287 Patent at 17:17-18:37; Figures 15A- 15D), or<br/> “lumen 171” (18:15-18), or<br/> “valves, fluid lines, and the like” (18:38-42), and<br/> equivalents of these structures.</p> | <p><u>Intrinsic Evidence</u></p> <p>’052 Patent<sup>1</sup> at Abstract, 2:14-23, 2:66-3:9, 3:40-47, 3:51-57, 4:56-67, 5:12-50, 5:58-67, 6:9-25, 7:15-37, 7:61-8:12, 8:21-42, 8:67-9:11, 14:26-36, 15:38-48, 16:22-50, 16:61-18:34, Figs. 1, 15A-16.</p> <p>’287 Patent at claim 11.</p> <p>’287 File History, including the October 11, 2023 Office Action at Pages 1-18, October 16, 2023 Amended Claims and Applicant Arguments/Remarks Made in an Amendment at Pages 1-18.</p> <p><u>Extrinsic Evidence</u></p> <p>Testimony of Karl Leinsing or a similarly qualified expert on one or more of the following subjects: the definition of a person of ordinary skill in the art; how one of ordinary skill in the art would understand this claim term; and how the intrinsic and extrinsic evidence addresses this claim term, including, for example, the December 4, 2025 deposition of Karl Leinsing in <i>HydraFacial, LLC v. Aesthetic Management Partners, LLC et al.</i>, 2:24-cv-02480, the December 4, 2025 deposition of Karl Leinsing in <i>Sinclair Pharma Ltd. et al. v. HydraFacial LLC</i>, IPR2025-00145, and Karl Leinsing’s expert claim construction report dated November 13, 2025. The expert may also respond to constructions offered by AMP, opinions rendered by AMP’s expert(s), and/or respond to any allegations by AMP that this or any other term is indefinite.</p> |

<sup>1</sup> Each of the ’052 Patent, ’477 Patent, ’287 Patent, ’089 Patent, ’641 Patent, and ’642 Patent share a common specification. Thus, HydraFacial cites the relevant column and line number of the ’052 Patent where applicable.

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|         |                                                                                                                                                                                                                                                  |                                                                                                        | <p><i>Certain Hydrodermabrasion Systems and Components Thereof</i>, ITC Inv. No. 337-TA-1408, Order No. 29 (March 14, 2025).</p> <p><i>Certain Hydrodermabrasion Systems and Components Thereof</i>, ITC Inv. No. 337-TA-1408, Order No. 32 (March 19, 2025).</p> <p><i>Certain Hydrodermabrasion Systems and Components Thereof</i>, ITC Inv. No. 337-TA-1408, Order No. 50 (June 11, 2025).</p> <p><i>Certain Hydrodermabrasion Systems and Components Thereof</i>, ITC Inv. No. 337-TA-1408, Initial Determination (September 17, 2025).</p> <p>Intrinsic and extrinsic evidence cited to or relied upon by AMP.</p> |
| “fluid” | <p>’052 Patent:<br/>Claims 1-6, 10, 11, 13, 15, 17</p> <p>’477 Patent:<br/>Claims 1, 6, 9, 15</p> <p>’287 Patent:<br/>Claims 11, 16, 22, 23, 25</p> <p>’089 Patent:<br/>Claim 1</p> <p>’641 Patent:<br/>Claims 1, 10, 15</p> <p>’642 Patent:</p> | <p>Plain and ordinary meaning.<br/>No construction necessary.</p> <p>If construed: “liquid or gas”</p> | <p><u><i>Intrinsic Evidence</i></u></p> <p>’052 Patent at Abstract, 1:24-2:59, 2:66-3:25, 3:40-47, 5:12-5:67, 6:9-6:36, 7:25-37, 8:1-52, 8:66-9:11, 9:28-10:9, 10:26-57, 11:3-21, 11:30-67, 13:3-21, 14:26-48, 14:61-15:9, 15:16-17:17, 17:61-18:34, 18:62-67, 19:23-47.</p> <p>’052 Patent at claims 1-6, 10, 11, 13, 15, 17.</p> <p>’477 Patent at claims 1, 6, 9, 15.</p> <p>’287 Patent at claims 11, 16, 22, 23, 25.</p> <p>’089 Patent at claim 1.</p> <p>’641 Patent at claims 1, 10, and 15.</p>                                                                                                                |

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|  | Claims 1, 3, 4, 10, 11 |  | <p>'642 Patent at claims 1, 4, 10, and 11.</p> <p>'287 File History including the October 11, 2023 Office Action Pages 1-18.</p> <p><u>Extrinsic Evidence</u></p> <p><i>Fluid</i>, Webster's Coll. Dictionary with CD-ROM (2d 2005);<br/> <i>Fluid</i>, The Chambers Dictionary (2003);<br/> <i>Fluid</i>, Microsoft Encarta Coll. Dictionary (2001);<br/> <i>Fluid</i>, McGraw-Hill Dictionary of Sci. &amp; Tech. Terms (6th ed. 2003);<br/> <i>Fluid</i>, McGraw-Hill Dictionary of Sci. &amp; Tech. Terms (5th ed. 1994);<br/> <i>Fluid</i>, Collins Eng. Dictionary (7th ed. 2005);<br/> <i>Fluid</i>, Cambridge Int'l Dictionary of Eng. (1st ed. 1995).</p> <p>Testimony of Karl Leinsing or a similarly qualified expert on one or more of the following subjects: the definition of a person of ordinary skill in the art; how one of ordinary skill in the art would understand this claim term; and how the intrinsic and extrinsic evidence addresses this claim term, including, for example, the December 4, 2025 deposition of Karl Leinsing in <i>HydraFacial, LLC v. Aesthetic Management Partners, LLC et al.</i>, 2:24-cv-02480, the December 4, 2025 deposition of Karl Leinsing in <i>Sinclair Pharma Ltd. et al. v. HydraFacial LLC</i>, IPR2025-00145, and Karl Leinsing's expert claim construction report dated November 13, 2025. The expert may also respond to constructions offered by AMP, opinions rendered by AMP's expert(s), and/or respond to any allegations by AMP that this or any other term is indefinite.</p> <p>Intrinsic and extrinsic evidence cited to or relied upon by AMP.</p> |
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| “treatment fluid” | ’287 Patent:<br>Claims 16 and 23 | No construction necessary.<br><br>If construed: “liquid for treating skin” | <p><u>Intrinsic Evidence</u></p> <p>’052 Patent at Abstract, 1:24-2:59, 2:66-3:25, 3:40-47, 5:12-5:67, 6:9-6:36, 7:25-37, 8:1-52, 8:66-9:11, 9:28-10:9, 10:26-57, 11:3-21, 11:30-67, 13:3-21, 14:26-48, 14:61-15:9, 15:16-17:17, 17:61-18:34, 18:62-67, 19:23-47.</p> <p>’052 Patent at claims 1-6, 10-13, 15, 17.</p> <p>’477 Patent at claims 1, 3, 6, 8, 9, 12, 14, 15, 18, 20.</p> <p>’287 Patent at claims 11-13, 15, 16, 18, 22, 23, 25.</p> <p>’287 File History including the October 11, 2023 Office Action Pages 1-18.</p> <p><u>Extrinsic Evidence</u></p> <p><i>Fluid</i>, Webster’s Coll. Dictionary with CD-ROM (2d 2005);<br/> <i>Fluid</i>, The Chambers Dictionary (2003);<br/> <i>Fluid</i>, Microsoft Encarta Coll. Dictionary (2001);<br/> <i>Fluid</i>, McGraw-Hill Dictionary of Sci. &amp; Tech. Terms (6th ed. 2003);<br/> <i>Fluid</i>, McGraw-Hill Dictionary of Sci. &amp; Tech. Terms (5th ed. 1994);<br/> <i>Fluid</i>, Collins Eng. Dictionary (7th ed. 2005);<br/> <i>Fluid</i>, Cambridge Int’l Dictionary of Eng. (1st ed. 1995).</p> <p>Testimony of Karl Leinsing or a similarly qualified expert on one or more of the following subjects: the definition of a person of ordinary skill in the art; how one of ordinary skill in the art would understand this claim term; and how the intrinsic and</p> |

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|                      |                                                                                                                                                                  |                                                                                                                   | <p>extrinsic evidence addresses this claim term, including, for example, the December 4, 2025 deposition of Karl Leinsing in <i>HydraFacial, LLC v. Aesthetic Management Partners, LLC et al.</i>, 2:24-cv-02480, the December 4, 2025 deposition of Karl Leinsing in <i>Sinclair Pharma Ltd. et al. v. HydraFacial LLC</i>, IPR2025-00145, and Karl Leinsing’s expert claim construction report dated November 13, 2025. The expert may also respond to constructions offered by AMP, opinions rendered by AMP’s expert(s), and/or respond to any allegations by AMP that this or any other term is indefinite.</p> <p>Intrinsic and extrinsic evidence cited to or relied upon by AMP.</p>                                             |
| “treatment material” | <p>’052 Patent:<br/>Claims 1, 2, 6, 11-13</p> <p>’477 Patent:<br/>Claims 1, 3, 8, 9, 12, 14, 15, 18, 20</p> <p>’287 Patent:<br/>Claims 11-13, 15, 16, 18, 22</p> | <p>Plain and ordinary meaning.<br/>No construction necessary.</p> <p>If construed: “liquid for treating skin”</p> | <p><u>Intrinsic Evidence</u></p> <p>’052 Patent at 1:24-2:59, 2:66-3:25, 3:40-47, 5:12-5:67, 6:9-6:36, 7:25-37, 8:1-52, 8:66-9:11, 9:28-10:9, 10:26-57, 11:3-21, 11:30-67, 13:3-21, 14:26-48, 14:61-15:9, 15:16-17:17, 17:61-18:34, 18:62-67, 19:23-47.</p> <p>’052 Patent at claims 1-6, 10-13, 15, 17.</p> <p>’477 Patent at claims 1, 3, 6, 8, 9, 12, 14, 15, 18, 20.</p> <p>’287 Patent at claims 11-13, 15, 16, 18, 22, 23, 25.</p> <p>’287 File History including the October 11, 2023 Office Action Pages 1-18.</p> <p>’052 File History including the August 5, 2015 Office Action Pages 1-12, February 5, 2016 Amended Claims and Applicant Arguments/Remarks Made in an Amendment at 6-9.</p> <p><u>Extrinsic Evidence</u></p> |

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|               |                                                                                  |                                                                                                              | <p>Testimony of Karl Leinsing or a similarly qualified expert on one or more of the following subjects: the definition of a person of ordinary skill in the art; how one of ordinary skill in the art would understand this claim term; and how the intrinsic and extrinsic evidence addresses this claim term, including, for example, the December 4, 2025 deposition of Karl Leinsing in <i>HydraFacial, LLC v. Aesthetic Management Partners, LLC et al.</i>, 2:24-cv-02480, the December 4, 2025 deposition of Karl Leinsing in <i>Sinclair Pharma Ltd. et al. v. HydraFacial LLC</i>, IPR2025-00145, and Karl Leinsing’s expert claim construction report dated November 13, 2025. The expert may also respond to constructions offered by AMP, opinions rendered by AMP’s expert(s), and/or respond to any allegations by AMP that this or any other term is indefinite.</p> <p>Intrinsic and extrinsic evidence cited to or relied upon by AMP.</p> |
| “spiral-like” | <p>’641 Patent:<br/>Claims 1, 10, 15</p> <p>’642 Patent:<br/>Claims 1, 8, 13</p> | <p>Plain and ordinary meaning.<br/>No construction necessary.</p> <p>If construed: “similar to a spiral”</p> | <p><u>Intrinsic Evidence</u></p> <p>’052 Patent at 2:24-37, 3:10-25, 3:58-4:22, 4:23-26, 5:3-8, 7:25-37, 9:12-17, 9:28-10:55, 11:38-49, Figs. 2A-8D, 18, 19.</p> <p>’641 Patent, Claims 1-4, 9, 10, 13-15, 17, and 18.</p> <p>’642 Patent, Claims 1, 2, 8, 9, and 13.</p> <p>’641 File History including the December 18, 2017 Office Action at Pages 1-4, July 19, 2018 Amended Claims and Applicant Arguments/Remarks Made in Amendment at Pages 6-11.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

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|  |  |  | <p>'642 File History including the March 19, 2018 Office Action at Pages 1-5, Amended Claims and Applicant Arguments/Remarks Made in Amendment at Pages 6-10.</p> <p><u>Extrinsic Evidence</u></p> <p><i>Spiral, Webster's Third New Int'l Dictionary of the Eng. Language Unabridged</i> (2002);<br/> <i>Spiral, Webster's Coll. Dictionary with CD-ROM</i> (2d 2005);<br/> <i>Spiral, The Chambers Dictionary</i> (2003);<br/> <i>Spiral, Microsoft Encarta Coll. Dictionary</i> (2001);<br/> <i>Spiral, McGraw-Hill Dictionary of Sci. &amp; Tech. Terms</i> (6th ed. 2003);<br/> <i>Spiral, McGraw-Hill Dictionary of Sci. &amp; Tech. Terms</i> (5th ed. 1994);<br/> <i>Spiral, Collins Eng. Dictionary</i> (7th ed. 2005);<br/> <i>Spiral, Cambridge Int'l Dictionary of Eng.</i> (1st ed. 1995).</p> <p>Testimony of Karl Leinsing or a similarly qualified expert on one or more of the following subjects: the definition of a person of ordinary skill in the art; how one of ordinary skill in the art would understand this claim term; and how the intrinsic and extrinsic evidence addresses this claim term, including, for example, the December 4, 2025 deposition of Karl Leinsing in <i>HydraFacial, LLC v. Aesthetic Management Partners, LLC et al.</i>, 2:24-cv-02480, the December 4, 2025 deposition of Karl Leinsing in <i>Sinclair Pharma Ltd. et al. v. HydraFacial LLC</i>, IPR2025-00145, and Karl Leinsing's expert claim construction report dated November 13, 2025. The expert may also respond to constructions offered by AMP, opinions rendered by AMP's expert(s), and/or respond to any allegations by AMP that this or any other term is indefinite.</p> |
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| “abrade” | <p>’641 Patent, Claims 1, 10, 15</p> <p>’642 Patent, Claims 1, 8, 14</p> | <p>Plain and ordinary meaning.<br/>No construction necessary.</p> <p>If “abrade” is construed: “to wear away or remove”</p> | <p><u>Intrinsic Evidence</u></p> <p>’052 Patent at Title, Abstract, 1:20-2:10, 3:10-39, 5:22-57, 7:15-60, 8:43-52, 10:10-19, 10:26-11:8, 11:50-67, 12:30-46, 13:3-15, 19:17-42, 20:33-45.</p> <p>’641 Patent, Claims 1, 10, 15.</p> <p>’642 Patent, Claims 1, 2, 8, 9, 14.</p> <p>’641 File History including the December 18, 2017 Office Action at Pages 1-4, July 19, 2018 Amended Claims and Applicant Arguments/Remarks Made in Amendment at Pages 6-11.</p> <p>’642 File History including the March 19, 2018 Office Action at Pages 1-5, Amended Claims and Applicant Arguments/Remarks Made in Amendment at Pages 6-10.</p> <p><u>Extrinsic Evidence</u></p> <p><i>Abrade</i>, Webster’s Coll. Dictionary with CD-ROM (2d 2005);<br/> <i>Abrade</i>, The Chambers Dictionary (2003);<br/> <i>Abrade</i>, Microsoft Encarta Coll. Dictionary (2001);<br/> <i>Abrade</i>, McGraw-Hill Dictionary of Sci. &amp; Tech. Terms (5th ed. 1994);<br/> <i>Abrade</i>, Cambridge Int’l Dictionary of Eng. (1st ed. 1995).</p> <p>Testimony of Karl Leinsing or a similarly qualified expert on one or more of the following subjects: the definition of a person of ordinary skill in the art; how one of ordinary skill in the art</p> |

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|  |  |  | <p>would understand this claim term; and how the intrinsic and extrinsic evidence addresses this claim term, including, for example, the December 4, 2025 deposition of Karl Leinsing in <i>HydraFacial, LLC v. Aesthetic Management Partners, LLC et al.</i>, 2:24-cv-02480, the December 4, 2025 deposition of Karl Leinsing in <i>Sinclair Pharma Ltd. et al. v. HydraFacial LLC</i>, IPR2025-00145, and Karl Leinsing’s expert claim construction report dated November 13, 2025. The expert may also respond to constructions offered by AMP, opinions rendered by AMP’s expert(s), and/or respond to any allegations by AMP that this or any other term is indefinite.</p> <p>Intrinsic and extrinsic evidence cited to or relied upon by AMP.</p> |
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