IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

HYDRAFACIAL LLC, Plaintiff, v. AESTHETIC MANAGEMENT PARTNERS, LLC and AESTHETIC MANAGEMENT PARTNERS INC., Defendants.	Civil Action No. 2:24-cv-02480-SHL-tmp

DEFENDANT AMP'S FINAL CLAIM
CONSTRUCTIONS AND DISCLOSURES UNDER LPR 4.2(c)

Defendants Aesthetic Management Partners, LLC and Aesthetic Management Partners Inc. (collectively, "AMP"), by and through its attorneys, and pursuant to Local Patent Rule 4.2(c), hereby provides Final Claim Constructions which set forth AMP's proposed claim constructions and supporting evidence. The claim terms come from U.S. Patent Nos. 9,550,052 ("the '052 patent"), 11,865,287 ("the '287 patent"), 11,446,477 ("the '477 patent"), 10,357,641 ("the '641 patent"), and 10,357,642 ("the '642 patent") (collectively, the "Patents-in-Suit"), and are described in detail in below. Any extrinsic supporting evidence cited in support of AMP's Claim Constructions which has not been previously produced, is being produced to Plaintiff HydraFacial LLC ("HydraFacial") in accordance with Local Patent Rule 4.2(b).

AMP has made a good faith effort to include herein all known support in the intrinsic record for the respective constructions, but AMP reserves the right to supplement or amend the Final Claim Constructions based on further investigation, discovery, and evaluation of the scope and content of the prior art, and based on any changes in HydraFacial's claims and contentions.

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AMP also reserves the right to withdraw any of the identified claim terms from consideration based on further review and/or discovery.

AMP's proposed constructions and identification of intrinsic evidence are preliminary, including without limitation because discovery is ongoing and not yet complete (see above). AMP expressly reserves the right to modify its Final Claim Constructions as the case progresses, documents are produced and exchanged, and testimony is elicited. AMP reserves the right to modify its Final Claim Constructions regarding any term in the agreed-upon list of terms for construction. For any term not included in the agreed-upon list of terms for construction, AMP reserves the right to object to any construction HydraFacial offers later, and AMP further reserves the right to propose its own constructions for any such terms. AMP also reserves the right to offer expert testimony or other intrinsic or extrinsic evidence to support AMP's Final Claim Constructions or to rebut any proposed construction, expert testimony, or evidence, if any, offered by HydraFacial in support of HydraFacial's Preliminary Claim Constructions.

AMP incorporates herein (1) HydraFacial's deficient Initial Infringement Contentions served on July 14, 2025 ("HydraFacial Infringement Contentions") including the apparent constructions of terms therein (to the best they can be understood), (2) AMP's Initial Non-Infringement Contentions served on August 25, 2025, (3) AMP's Invalidity and Unenforceability Contentions served on September 22, 2025, (4) the Patents-in-Suit, (5) the prosecution histories of the Patents-in-Suit, U.S. Provisional Application No. 60/755,310 and U.S. Provisional Application No. 60/764,668, and all applications claiming priority to U.S. Provisional Application No. 60/755,310 and U.S. Provisional Application No. 60/764,668 (such applications, patents, and prosecution histories being incorporated herein by reference), and (6) any intrinsic

or extrinsic evidence presented in HF's Preliminary Claim Constructions, including all supporting materials and citations identified in (1)-(6) listed above.

Each of AMP's proposed Final Claim Constructions is included in the chart below, including to the extent any term is subject to 35 U.S.C. § 112, ¶6 along with an identification of the structure(s), act(s), or material(s) corresponding to that term's function. The Patents-in-Suit each share a common specification, and the same or similar terms used in the asserted claims of these patents should be given substantially the same meaning throughout (accounting for the context of the surrounding claim language).

In addition, the term "spiral-like" identified for construction is indefinite as detailed in AMP's Initial Invalidity and Unenforceability Contentions.

Accordingly, any proposed constructions are presented in a good faith effort to comply with the Local Patent Rules, and AMP makes no admission or waiver regarding the validity of any asserted claim based on the proposed Final Claim Constructions.

Subject to the above reservation of rights, AMP proposes the following constructions for the proposed claim terms for the Patents-in-Suit:

Claim Term	**Defendant's Construction**	**Defendant's Intrinsic Evidence**	**Defendant's Extrinsic Evidence**
Fluid	"includes, but is not limited to, medicament, a substance tending to flow or conform to the outline of its container such as fluid, gas, liquid (e.g., serums, water,	'052 patent[1] at 3:10-25, 5:35-50, 11:33-35, 11:59-61, 13:39-45, 14:26-31, 15:49-16:50, Claims 1, 11. U.S. Provisional Application No.	*Academic Press Dictionary of Science and Technology* (1992) ("fluidization *Chemical Engineering.* a technique in which a finely divided solid is caused to behave in the manner of a fluid by its being suspended in a moving gas or liquid; the solids treated in this way are frequently catalysts.")

[1] Each of the '052 patent, '287 patent, '477 patent, '641 patent, and '642 patent share a common specification. Thus, AMP cites the relevant column and line number of the '052 patent or the '641 patent where applicable.

Claim Term	Defendant's Construction	Defendant's Intrinsic Evidence	Defendant's Extrinsic Evidence
	saline, etc.), gel, fluidized material, additives, and/or a plurality of fine solids."	60/755,310 at Claims 1, 5-6. U.S. Provisional Application No. 60/764,668 at Claims 1, 5-6. U.S. Patent Application Publication No. 2003/0212415 ("Karasiuk") at [0060]. U.S. Patent No. 5,971,999 at *e.g.*, Abstract, 1:7-9. The Final Rejection (dated March 7, 2016) and the Response (dated August 8, 2016) in the '052 patent prosecution history. The Non-Final Rejection (dated August 5, 2015) and the Response (dated February 5, 2016) in the '052 patent prosecution history. The Non-Final Rejection (dated October 11, 2023) and the Response (dated October 16, 2023) in the '287 patent prosecution history.	*Merriam Webster's Collegiate Dictionary* (10th ed. 1995) ("fluid *n* (1661) : a substance (as a liquid or gas) tending to flow or conform to the outline of its container") ("fluidize…1 : to cause to flow like a fluid 2 : to suspend (as solid particles) in a rapidly moving stream of gas or vapor to induce flowing motion of the whole") *The American Heritage College Dictionary* (3d ed. 1997) (fluid "*n.* A continuous amorphous substance whose molecules move freely past one another and that assumes the shape of its container; a liquid or gas.") (fluidize "1. To make fluid. 2. To pulverize (a solid) so finely that it takes on most of the properties of a fluid.") Deposition Transcript of Karl R. Leinsing, dated Dec. 4, 2025 at 23:23-34:10

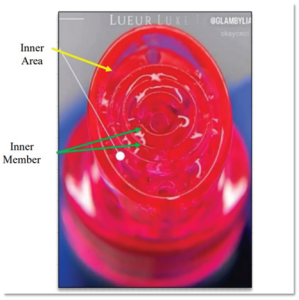
Claim Term	Defendant's Construction	Defendant's Intrinsic Evidence	Defendant's Extrinsic Evidence
		The Non-Final Rejection (dated April 5, 2022) and the Response (dated May 4, 2022) in the '477 patent prosecution history. The Final Rejection (dated September 15, 2021) and the Response (dated December 15, 2021) in the '477 patent prosecution history. The Non-Final Rejection (dated March 22, 2021) and the Response (dated August 20, 2021) in the '477 patent prosecution history. The Final Rejection (dated September 19, 2018) and the Response (dated February 19, 2019) in the '641 patent prosecution history. The Final Rejection (dated September 20, 2018) and the Response (dated February 19, 2019) in the '642 patent prosecution history. The Non-Final Rejection (dated May 24, 2025) and	

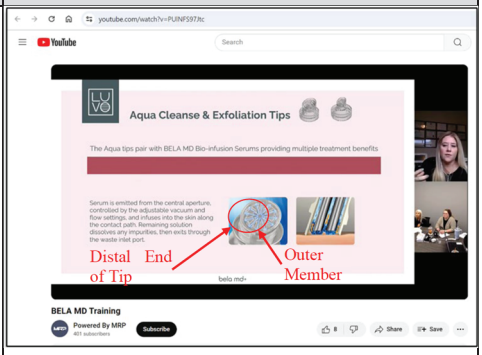
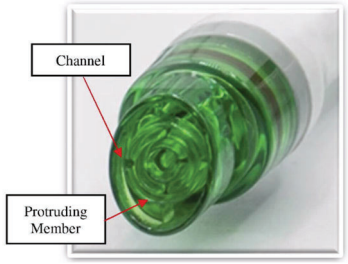
Claim Term	Defendant's Construction	Defendant's Intrinsic Evidence	Defendant's Extrinsic Evidence
		the Response (dated November 22, 2025) in the U.S. Patent Application No. 18/638,470 prosecution history. The Final Rejection (dated January 6, 2025) and the Response (dated July 7, 2025) in the U.S. Patent Application No. 18/638,470 prosecution history. The Final Rejection (dated August 26, 2025) in the U.S. Patent Application No. 18/638,470 prosecution history. The Final Rejection (dated June 24, 2016) and the Response (dated December 22, 2016) in the U.S. Patent Application No. 14/700,789 prosecution history. The Non-Final Rejection (dated February 7, 2017) and the Response (dated June 7, 2017) in the U.S. Patent Application No. 14/700,789 prosecution history.	

Claim Term	Defendant's Construction	Defendant's Intrinsic Evidence	Defendant's Extrinsic Evidence
		The Final Rejection (dated March 30, 2016) and the Response (dated June 1, 2016) in the U.S. Patent Application No. 13/267,554 prosecution history. The Non-Final Rejection (dated April 19, 2021) and the Response (dated September 20, 2021) in the U.S. Patent Application No. 17/165,807 prosecution history. The Final Rejection (dated October 28, 2021) and the Response (dated April 28, 2022) in the U.S. Patent Application No. 17/165,807 prosecution history. The Non-Final Rejection (dated June 30, 2022) and the Response (dated October 31, 2022) in the U.S. Patent Application No. 17/165,807 prosecution history. The Non-Final Rejection (dated April 19, 2021) and the Response (dated	

Claim Term	Defendant's Construction	Defendant's Intrinsic Evidence	Defendant's Extrinsic Evidence
		September 20, 2021) in the U.S. Patent Application No. 17/165,820 prosecution history. The Final Rejection (dated October 29, 2021) and the Response (dated April 28, 2022) in the U.S. Patent Application No. 17/165,820 prosecution history. The Non-Final Rejection (dated May 27, 2022) and the Response (dated August 26, 2022) in the U.S. Patent Application No. 17/165,820 prosecution history. The Non-Final Rejection (dated May 24, 2024) and the Response (dated May 30, 2024) in the U.S. Patent Application No. 18/487,916 prosecution history. The Non-Final Rejection (dated August 5, 2015) and the Response (dated February 5, 2016) in the U.S. Patent Application No.	

Claim Term	Defendant's Construction	Defendant's Intrinsic Evidence	Defendant's Extrinsic Evidence
		14/698,713 prosecution history. The Final Rejection (dated March 1, 2016) and the Response (dated June 1, 2016) in the U.S. Patent Application No. 14/698,713 prosecution history. The Non-Final Rejection (dated September 8, 2016) and the Response (dated February 8, 2017) in the U.S. Patent Application No. 14/698,713 prosecution history. AMP may also rely on the absence of use of the term in certain parts of the specifications.	
Treatment fluid	"includes, but is not limited to, medicament, a substance tending to flow or conform to the outline of its container such as fluid, gas, liquid (e.g., serums, water, saline, etc.), gel, fluidized material, additives, and/or a plurality of fine solids."	*See* evidence for "fluid."	*See* evidence for "fluid."

Claim Term	Defendant's Construction	Defendant's Intrinsic Evidence	Defendant's Extrinsic Evidence
Treatment material	"includes, but is not limited to, medicament, a substance tending to flow or conform to the outline of its container such as fluid, gas, liquid (e.g., serums, water, saline, etc.), gel, fluidized material, additives, and/or a plurality of fine solids."	*See* evidence for "fluid."	*See* evidence for "fluid."
Spiral-like	Indefinite	'641 patent at Figs. 2A, 4, 5A, 5B, 6A, 6B, 7A, 7B, 2:26-39, 9:52-10:62, Claims 1, 10, 15. AMP may also rely on the absence of use of the term in certain parts of the specifications.	Complaint from *HydraFacial LLC v. BQ Aesthetix & Co.*, No. 0:25-cv-61262-AHS (S.D. Fla.) at 64 (alleging that two ridges that form "concentric circles" satisfy each "spiral" claim limitation) (HF-MPR_01154372)  The BQ Aesthetix tip accused by HydraFacial of infringement Images of the BQ Aesthetix tip accused by HydraFacial of infringement (AMP_00018013 - AMP_00018017; AMP_00018023) Complaint from *HydraFacial LLC v. Luvo Medical Techs. Inc.*, No. 2:24-cv-00587 (D. Utah) at 33

Claim Term	Defendant's Construction	Defendant's Intrinsic Evidence	Defendant's Extrinsic Evidence
			 The Luvo Medical Technologies Tip accused by HydraFacial of Infringement MRP training video referenced in HydraFacial's complaint against Luvo Medical Technologies Complaint from *HydraFacial LLC v. Medicreations, LLC*, No. 2:24-cv-00855-MMD-DJA (D. Nev.) at 55 (HF-MPR_01130888)  The Medicreations tip accused by HydraFacial of infringement Images of the Medicreations tip accused by HydraFacial of infringement (AMP_00018018 - AMP_00018022) *Merriam Webster's Collegiate Dictionary* (10th ed. 1995) ("spiral *n* (1656)…a : the path of a point in a plane moving around a central point while continuously receding from or

Claim Term	Defendant's Construction	Defendant's Intrinsic Evidence	Defendant's Extrinsic Evidence
			approaching it; ("spiral galaxy *n* (1913) : a galaxy exhibiting a central nucleus or barred structure from which extend concentrations of matter forming curved arms – called also *spiral nebula*") *The American Heritage College Dictionary* (3d ed. 1997) (spiral "A curve on a plane that winds around a fixed center point at a continuously increasing or decreasing distance from the point.") Deposition Transcript of Karl R. Leinsing, dated Dec. 4, 2025 at 8:3-23:22
Abrade [skin / skin of a subject]	"remove the surface of the skin due to mechanical rubbing by a rough or sharp member"	'641 patent at Figs. 2A-11E, 1:25-2:15, 3:12-27, 4:46-49, 5:24-53, 7:11-32, 7:36-51, 10:15- 24, 10:48-11:13, 11:55-12:5, 12:34-50, 13:66-14:18, 18:38-47, 20:36-48. U.S. Patent No. 9,474,886 at Claim 1 ("at least one inner member protruding from the distal surface, said at least one inner member comprising at least one sharp edge configured to abrade skin tissue when the tip is moved relative to skin").	Complaint from *HydraFacial LLC v. Medicreations, LLC*, No. 2:24-cv-00855-MMD-DJA (D. Nev.) at 8 ("The raised surfaces include edges that are sharp enough to abrade and exfoliate skin"), 23 ("The skin interface of the AquaPeel includes a structure made of hard plastic, that is sharp enough to abrade when translated on the skin"), 26 ("The abrading surface has hard plastic apexes extending upwardly from the abrading surface with edges sharp enough to abrade skin."), 27 ("The process abrades skin drawn against the sharp edge of the apexes"), 29 ("The distal end of the working end of the AquaPeel tip comprises a working surface comprising a plurality of rigid plastic elements sharp enough to abrade the skin surface"), 32 ("The working end of the AquaPeel tip comprises an abrading structure comprising a

Claim Term	Defendant's Construction	Defendant's Intrinsic Evidence	Defendant's Extrinsic Evidence
		AMP may also rely on the absence of use of the term in certain parts of the specifications.	plurality of abrading elements configured to abrade skin with each comprising a sharp edge (the hard plastic elements shown below are sharp enough to abrade skin)."), 36 ("The working end of the AquaPeel includes surface elements made of hard plastic, that is sharp enough to abrade when translated on the skin"), 45 ("The protruding members of the tip include a structure made of hard plastic, that is sharp enough to abrade when translated on the skin"), 50 ("The inner members of the tip include structure made of hard plastic, that is sharp enough to abrade when translated on the skin."), 53 ("The inner members of the tip include structure made of hard plastic, that is sharp enough to and is configured to abrade when translated on the skin.") (HF-MPR_01130888) Complaint from *HydraFacial LLC v. BQ Aesthetix & Co.*, No. 0:25-cv-61262-AHS (S.D. Fla.) at 55 ("The protruding member of the Luxe Tip comprises at least one sharp edge configured to abrade skin. The protruding member of the Luxe Tip includes a structure made of hard plastic that has a sharp edge and is configured to abrade when translated on the skin."), 64 ("The inner member of the Luxe Tip includes a structure made of hard plastic that is configured to abrade when translated on the skin.") (HF-MPR_01154372) Complaint from *HydraFacial LLC v. Sinclair Pharma Ltd.*, No. 2:24-cv-06250-MEMF-MAR (C.D. Cal.)

Claim Term	Defendant's Construction	Defendant's Intrinsic Evidence	Defendant's Extrinsic Evidence
			at 7 ("The raised surfaces include edges that are sharp enough to abrade and exfoliate skin.") (HF-MPR_01162347) Complaint from *Edge Systems LLC v. Aesthetic Skin Systems LLC*, No. 17-4597 PSG (C.D. Cal.) at ¶ 31 ("At least some of the tips that can be used with the handpiece of the Accused Product have abrading structures with substantially sharp edges to abrade the skin."), ¶ 40 ("The Accused Product can be used with tips that include substantially sharp edge for abrading skin."), ¶ 45 ("The Accused Product includes, for example, tips that include apexes that extend upwardly from an abrading surface, where the apexes have sharp edges."), ¶ 46 ("The continuous suction of the vacuum source keeps the skin drawn against the sharp edge of the apexes of the tip, which abrades the skin as the handpiece is moved across the surface of the skin."), ¶ 51 ("The Accused Product includes, for example, tips that have a plurality of sharp elements for abrading skin."), ¶ 52 ("The continuous suction of the vacuum source keeps the skin drawn against the outer periphery of the tip and against the sharp elements of the abrading structures, which abrades the skin as the handpiece is moved across the surface of the skin.") (HF-MPR_01106401) HydraFacial's Claim Construction Brief from *Edge Systems LLC v. Aesthetic Skin Systems LLC*, No. 17-4597 PSG (C.D. Cal.) at 3 ("The working end includes a structure for

Claim Term	Defendant's Construction	Defendant's Intrinsic Evidence	Defendant's Extrinsic Evidence
			abrading the surface of the skin. This abrading structure may consist of a series of edges that are sharp enough to abrade the surface of the skin. The working end also includes two apertures or ports. Treatment media is delivered to the patient's skin through the first aperture. The second aperture is in communication with a vacuum source which assists in the removal of abraded skin and used therapeutic fluid."), 5 ("This abrading structure must include 'substantially sharp edges.' How sharp? The answer is in the claim itself: sharp enough 'for abrading tissue.'"), 14 ("As previously discussed, 'sharp edges' in the context of this invention are edges that are sufficiently sharp to abrade skin."), 19 ("If the word 'periphery' is defined as an 'edge,' the jury may incorrectly assume that the word 'periphery' carries all of the additional meaning found in this Court's construction of the claim terms that include the word 'edge.' For example, the jury may wrongly conclude that a 'periphery' needs to be sharp, or sufficiently sharp to abrade skin."), 20 (discussion of "spiral") Complaint from *Edge Systems LLC v. Image MicroDerm Inc.*, No. 2:17-cv-08699 (C.D. Cal.) at ¶ 25 ("For each of the Accused Products, at least some of the tips that are used with the handpiece of the Accused Product have abrading structures with substantially sharp edges to abrade the skin.") ¶ 41 ("Each of the Accused Products can be used with tips that include a substantially

Claim Term	Defendant's Construction	Defendant's Intrinsic Evidence	Defendant's Extrinsic Evidence
			sharp edge for abrading skin."), ¶ 84 ("each surface element having at least one sharp edge that is configured to abrade skin when the handpiece is moved relative to the skin surface.") (HF-MPR_01107505) Complaint from *Edge Systems, LLC v. Cartessa Aesthetics, LLC*, No. 2:20-cv-06082 (E.D.N.Y.) at ¶ 21 ("The raised surfaces include edges that are sharp enough to abrade and exfoliate skin"), ¶ 36 ("The tip is made of hard plastic and comprises a configuration with substantially sharp edges that abrade skin when the tip is translated across the skin."), page 16 ("The surface elements are made of hard plastic and comprise a configuration with sharp edges that abrade skin when the tip is translated across the skin surface."), page 20 ("The tip is made of hard plastic and comprises a configuration with a plurality of elements with sharp edges that abrade skin when the tip is translated across the skin surface") (HF-MPR_01100502) HydraFacial's Claim Construction Brief from *Edge Systems, LLC v. Cartessa Aesthetics, LLC*, No. 2:20-cv-06082 (E.D.N.Y.) at 2 ("This abrading structure includes an edge that is sharp enough to abrade skin."), 3 ("This abrading structure may consist of a series of edges that are sharp enough to abrade the surface of the skin"), 5 (HydraFacial's proposed construction of "abrade") (HF-MPR_01101123)

Claim Term	Defendant's Construction	Defendant's Intrinsic Evidence	Defendant's Extrinsic Evidence
			Friction and Wear of Materials (2d ed. 1995) ("Abrasive wear arises when a hard, rough surface slides against a softer surface, digs into it, and plows a series of grooves….Abrasive wear can also arise in a somewhat different situation, when hard, abrasive particles are introduced between sliding surfaces and abrade material off each.") *Manufacturing Engineering and Technology* (5th ed. 2006) ("Abrasives are capable of removing small amounts of material from a surface through a cutting process that produces tiny chips. Most of us are familiar with using grinding wheels … to sharpen knives and tools, as well as using sandpaper or emery cloth to smoothen surfaces and remove sharp corners.") *Merriam Webster's Collegiate Dictionary* (10th ed. 1995) ("abrade… a: to rub or wear away esp. by friction") ("abrasion… a : a wearing, grinding, or rubbing away by friction") ("abrasive… *n* (1953) : a substance (as emery or pumice) used for abrading, smoothing, or polishing") *The American Heritage College Dictionary* (3d ed. 1997) (abrade "To wear down or rub away by friction; erode") (abrasion "The process of wearing down or rubbing away by means of friction")
Fluid control member	Plain and ordinary meaning	'287 patent at Figs. 1, 15A-E, 16, Abstract, Summary,	*Markman* Order from *In the Matter of Certain Hydrodermabrasion Systems and Components Thereof*,

Claim Term	Defendant's Construction	Defendant's Intrinsic Evidence	Defendant's Extrinsic Evidence
		2:30-35, 3:11-13, 3:57-59, 5:1-11, 5:28-31, 6:6-8, 6:22-24, 7:37-49, 9:16-21, 14:38-40, 15:58-60, 17:17-18:37. The Non-Final Rejection (dated October 11, 2023) and the Response (dated October 16, 2023) in the '287 patent prosecution history. AMP may also rely on the absence of use of the term in certain parts of the specifications.	337-TA-1408 (AMP_00015001 - AMP_00015012) HydraFacial's Opening Claim Construction Brief from *In the Matter of Certain Hydrodermabrasion Systems and Components Thereof*, 337-TA-1408 (AMP_00007455) Leinsing Declaration from *In the Matter of Certain Hydrodermabrasion Systems and Components Thereof*, 337-TA-1408 (AMP_00007566) Cartessa's Opening Claim Construction Brief from *In the Matter of Certain Hydrodermabrasion Systems and Components Thereof*, 337-TA-1408 (AMP_00007600) Jensen Declaration from *In the Matter of Certain Hydrodermabrasion Systems and Components Thereof*, 337-TA-1408 (AMP_00015013 - AMP_00016058) Markman and CMC Hearing Transcript from *In the Matter of Certain Hydrodermabrasion Systems and Components Thereof*, 337-TA-1408 (AMP_00016059 - AMP_00016208) Ignon Deposition from *In the Matter of Certain Hydrodermabrasion Systems and Components Thereof*, 337-TA-1408 (HF-ITC1408_01155074)

Claim Term	Defendant's Construction	Defendant's Intrinsic Evidence	Defendant's Extrinsic Evidence
			Cohen Deposition from *In the Matter of Certain Hydrodermabrasion Systems and Components Thereof*, 337-TA-1408 (HF-ITC1408_01153873) Cartessa Prehearing Brief from *In the Matter of Certain Hydrodermabrasion Systems and Components Thereof*, 337-TA-1408 (AMP_00014721 - AMP_00014806; and AMP_00014807 - AMP_00014890) HydraFacial Prehearing Brief from *In the Matter of Certain Hydrodermabrasion Systems and Components Thereof*, 337-TA-1408 (AMP_00014925 - AMP_00015000)

Respectfully submitted,

Date: December 18, 2025

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CERTIFICATE OF SERVICE

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