From:	Riccio, Nicole
To:	Boettcher, Christian; Sayour, Tonia A.; Rader, Michael; Luster, Meaghan P.
Cc:	WGS-HydraFacialvAMP; MLB-HydraFacial v AMP; Morris, Angela; Everton, Benjamin; Razai, Ali; Kirby, Juliana; Vorder-Bruegge, Mark; Lubozynski, Matt; Mansberg Weintraub, Emma
Subject:	RE: HydraFacial v. AMP - HydraFacial"s Proposed Terms for Construction
Date:	Friday, September 26, 2025 6:12:38 PM
Attachments:	image001.png image002.png image003.png image004.png image005.png

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Counsel:

Pursuant to Local Patent Rule 4.1, AMP provides the following list of (a) claim terms that AMP contends should be construed, and (b) claim terms that AMP contends should be governed by 35 U.S.C. § 112, ¶6.

a. Claim terms to be construed:
   - "collection lumen"
   - "fluid control member"
   - "manifold" / "manifold system"
   - "fluid" / "treatment fluid"
   - "treatment material"
   - "spiral-like"
   - "abrade"
   - "sharp"

b. Claim terms governed by 35 U.S.C. § 112, ¶6.
   - "collection lumen"
   - "fluid control member"

AMP's identification is based on the information currently available to AMP. AMP reserves the right to revise, amend, and/or supplement this identification should discovery yield additional information. Discovery is ongoing, and AMP has not yet received HydraFacial's validity and enforceability contentions. Accordingly, AMP expressly reserves its right to amend, revise, supplement, expand, or otherwise modify its proposed claim terms for construction in light of any information, contentions, or arguments subsequently advanced, disclosed, or substantively supplemented by HydraFacial. AMP objects to any attempt by HydraFacial to expand the claims at issue, which would unfairly prejudice AMP at this juncture. Nevertheless, if HydraFacial is permitted to expand the claims at issue, AMP reserves the right to identify additional terms in those claims for construction. AMP further reserves the right to revise, amend, and/or supplement this identification based on, without limitation, any term or phrase, or any portion thereof, identified by HydraFacial as requiring construction, or as further meet

AMP Exhibit 1042
AMP v. HydraFacial
IPR2025-01169

and confers reveal the need for construction.

Thanks,

Nicole Berkowitz Riccio
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Baker, Donelson, Bearman, Caldwell & Berkowitz, PC represents clients across the U.S. and abroad from offices in Alabama, Florida, Georgia, Louisiana, Maryland, Mississippi, New Jersey, North Carolina, South Carolina, Tennessee, Texas and Washington, D.C.

From: Boettcher, Christian <christian.boettcher@morganlewis.com>
Sent: Friday, September 26, 2025 5:39 PM
To: Riccio, Nicole <NRiccio@bakerdonelson.com>; Sayour, Tonia A. <tonia.sayour@wolfgreenfield.com>; Rader, Michael <michael.rader@wolfgreenfield.com>; Luster, Meaghan P. <meaghan.luster@wolfgreenfield.com>
Cc: WGS-HydraFacialvAMP <wgs-hydrafacialvamp@wolfgreenfield.com>; MLB-HydraFacial v AMP <MLB-HydraFacialvAMP@morganlewis.com>; Everton, Benjamin <ben.everton@morganlewis.com>; Razai, Ali <ali.razai@morganlewis.com>; Kirby, Juliana <juliana.kirby@morganlewis.com>; Vorder-Bruegge, Mark <mvb@wyattfirm.com>; Lubozynski, Matt <mlubozynski@wyattfirm.com>; Mansberg Weintraub, Emma <emweintraub@wyattfirm.com>
Subject: HydraFacial v. AMP - HydraFacial's Proposed Terms for Construction

Counsel,

HydraFacial identifies the following claim term for construction as governed by 35 U.S.C. § 112, ¶6.

<!--[if !supportLists]-->• <!--[endif]-->"fluid control member" ('287 Patent)

HydraFacial's identification is based on the information currently available to HydraFacial. HydraFacial reserves the right to revise, amend, and/or supplement this identification should discovery yield additional information. Discovery is ongoing, and AMP has not provided sufficient contentions under LPR 3.5. Accordingly, HydraFacial expressly preserves its rights to amend, revise, supplement, expand, or otherwise modify its proposed claim terms for construction in light of any information, contentions, or arguments subsequently advanced, disclosed, or substantively supplemented by AMP. To the extent HydraFacial is permitted to expand the claims at issue for good cause, HydraFacial reserves the right to propose constructions for terms in those claims. HydraFacial further reserves the right to revise, amend, and/or supplement this identification based on, without limitation, any term or phrase, or any portion thereof, identified by AMP as requiring construction.

Best,

Christian Boettcher

Pronouns: He/Him/His
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