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Subject: HydraFacial v. AMP - HydraFacial's Proposed Terms for Construction
Date: Friday, September 26, 2025 5:39:08 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Counsel,

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

- “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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