

From: [Boettcher, Christian](#)
To: [Riccio, Nicole](#); [Rader, Michael](#); [Sayour, Tonia A.](#); [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, October 17, 2025 6:51:27 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Hi Nicole,

Per our call today, HydraFacial provides its final identification of claim terms for construction with the following claim term.

- “fluid control member” (’287 Patent); governed by 35 U.S.C. § 112, ¶6

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, as explained in HydraFacial’s Validity and Enforceability Contentions, 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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christian.boettcher@morganlewis.com | www.morganlewis.com



From: Riccio, Nicole <NRiccio@bakerdonelson.com>

Sent: Friday, October 17, 2025 1:24 PM

To: Rader, Michael <Michael.Rader@WolfGreenfield.com>; Boettcher, Christian <christian.boettcher@morganlewis.com>; Sayour, Tonia A. <Tonia.Sayour@WolfGreenfield.com>; Luster, Meaghan P. <Meaghan.Luster@WolfGreenfield.com>

Cc: WGS-HydraFacialvAMP <WGS-HydraFacialvAMP@WolfGreenfield.com>; MLB-HydraFacial v AMP <MLB-HydraFacialvAMP@morganlewis.com>; Morris, Angela <amorris@bakerdonelson.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>

AMP Exhibit 1044 AMP v. HydraFacial IPR2025-01169

Subject: RE: HydraFacial v. AMP - HydraFacial's Proposed Terms for Construction

[EXTERNAL EMAIL]

Counsel:

Following up on Mike's email below, below is AMP's final identification of terms for construction:

1. "fluid"
2. "treatment fluid"
3. "treatment material"
4. "spiral-like"
5. "abrade"

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. 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 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: Rader, Michael <Michael.Rader@WolfGreenfield.com>

Sent: Friday, October 17, 2025 3:41 PM

To: Riccio, Nicole <NRiccio@bakerdonelson.com>; Boettcher, Christian
<christian.boettcher@morganlewis.com>; Sayour, Tonia A.

<Tonia.Sayour@WolfGreenfield.com>; Luster, Meaghan P.

<Meaghan.Luster@WolfGreenfield.com>

Cc: WGS-HydraFacialvAMP <WGS-HydraFacialvAMP@WolfGreenfield.com>; MLB-HydraFacial v AMP <MLB-HydraFacialvAMP@morganlewis.com>; Morris, Angela <amorris@bakerdonelson.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: RE: HydraFacial v. AMP - HydraFacial's Proposed Terms for Construction

Counsel,

In an effort to streamline claim construction proceedings, AMP is prepared to reduce its claim terms to be construed to the following list. Please let us have your thoughts before or during the upcoming meet and confer call.

1. “fluid” / “treatment fluid”
2. “treatment material”
3. “spiral-like”
4. “abrade”

Thanks,

Mike Rader

From: Riccio, Nicole <NRiccio@bakerdonelson.com>

Sent: Tuesday, October 14, 2025 3:19 PM

To: Boettcher, Christian <christian.boettcher@morganlewis.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>; Morris, Angela <amorris@bakerdonelson.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: RE: HydraFacial v. AMP - HydraFacial's Proposed Terms for Construction

Christian,

As a heads up, Mike Rader will need to be involved on the meet-and-confer on claim construction, but was not planning to join for the meet-and-confer on ESI. I don't know his availability and he is out today and tomorrow for the Jewish holidays. We will need to circle back on this.

Thanks,

Nicole Berkowitz Riccio

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From: Boettcher, Christian <christian.boettcher@morganlewis.com>
Sent: Tuesday, October 14, 2025 2:35 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>; Morris, Angela <amorris@bakerdonelson.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: RE: HydraFacial v. AMP - HydraFacial's Proposed Terms for Construction

Nicole,

It makes sense to have the meet and confer on claim construction at the same time as our meet and confer on email search parameters. We intend to discuss claim construction first in case Mike or someone else from your team wants to join for the first part of the call.

Best,

Christian Boettcher

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From: Riccio, Nicole <NRiccio@bakerdonelson.com>
Sent: Monday, October 13, 2025 11:15 AM
To: Boettcher, Christian <christian.boettcher@morganlewis.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>; Morris, Angela <amorris@bakerdonelson.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: RE: HydraFacial v. AMP - HydraFacial's Proposed Terms for Construction

[EXTERNAL EMAIL]

Counsel,

Pursuant to Local Patent Rule 4.1(b), the parties are required to meet and confer to discuss the terms for construction. Can you please let us know your availability for a meet and confer on Friday, October 17?

Thanks,

Nicole Berkowitz Riccio

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From: Riccio, Nicole
Sent: Friday, September 26, 2025 6:12 PM
To: Boettcher, Christian <christian.boettcher@morganlewis.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>;
Morris, Angela <amorris@bakerdonelson.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: RE: HydraFacial v. AMP - HydraFacial's Proposed Terms for
Construction

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 and confers reveal the need for construction.

Thanks,

Nicole Berkowitz Riccio

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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.

- “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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from your system immediately without copying, reading or disseminating it, and notify the sender by reply e-mail, so that our address record can be corrected. Thank you very much.