IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

TETHRD, LLC,	)	
	)	
PLAINTIFF/COUNTERDEFENDANT,	)	Civil Action No. 1:24-cv-00076
	)	Chief Judge Campbell
v.	)	Magistrate Judge Holmes
	)	
CRÜZR SADDLES LLC,	)	JURY TRIAL DEMANDED
	)	
DEFENDANT/COUNTERCLAIMANT.	)	
	)	

PLAINTIFF/COUNTERDEFENDANT TETHRD, LLC'S
DISCLOSURE OF PROPOSED TERMS FOR CONSTRUCTION

Pursuant to the Initial Case Management Order (Dkt. No. 46), the First Modified Case Management Order (Dkt. No. 49), the Second Modified Case Management Order (Dkt. No. 52), and the Third Modified Case Management Order (Dkt. No. 56), Plaintiff/Counterdefendant Tethrd, LLC ("Tethrd") hereby makes the following disclosures to Defendant/Counterclaimant Cruzr Saddles LLC ("Cruzr") regarding U.S. Patent No. 11,964,175 (the "175 Patent"). This disclosure is preliminary, based on Tethrd's current knowledge, and subject to Tethrd's right of revision or supplementation, including in response to discovery or investigation of further information, Tethrd's proposed terms and/or constructions, and any of Tethrd's positions in this case. Tethrd thus reserves the right to amend or supplement these disclosures in accordance with the relevant rules and as deemed appropriate by the Court and/or parties.

I. Claim Terms

a) Claim Terms, Phrases, or Clauses Requiring Construction

None.

b) Claim Terms, Phrases, or Clauses Governed by 35 U.S.C. §112, ¶6

None.

Ex. 1139
Crüzr v. Tethrd

Date: July 11, 2025

By: */s/ Daniel Huynh*

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CERTIFICATE OF SERVICE

I hereby certify, on July 11, 2025, I served this document upon all counsel of record via email.

/s/ Daniel Huynh
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