

**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 DEMAND
	)	
Defendant/Counterclaimant.	)	
	)	

**DEFENDANT/COUNTERCLAIMANT CRÜZR SADDLES LLC'S
IDENTIFICATION OF CLAIM CONSTRUCTION ISSUES**

Pursuant to the Initial Case Management Order (“ICMO”) (Dkt. No. 46), the First Modified Case Management Order (Dkt. No. 49), the Second Modified Case Management Order (Dkt. No. 52), the Third Modified Case Management Order (Dkt. No. 56), and the case scheduling Order (Dkt. No. 60), Defendant/Counterclaimant Crüzr Saddles LLC (“Defendant”) provides its Identification of Claim Construction Issues for the asserted claims of United States Patent No. 11,964,175 (“the ’175 Patent”). In particular, Plaintiff/Counterdefendant Tethrd, LLC (“Plaintiff”) has asserted Claims 1-6 and 11 of the ’175 Patent. *See* Plaintiff Tethrd, LLC’s Initial Infringement Contentions at 1-2 & Ex. A. Accordingly, this Identification of Claim Construction Issues only addresses the seven (7) patent claims asserted by Plaintiff.

This Identification of Claim Construction Issues is based on information currently available to Defendant. Defendant’s investigation of Plaintiff Tethrd LLC’s (“Plaintiff’s”) allegations is in the early stages, and no construction of claim terms or substantive discovery in this action has occurred. Defendant therefore reserves the right to amend and/or supplement this Identification of Claim Construction Issues. Thus, nothing herein shall be construed as a waiver of Defendant’s right

to seek more detailed infringement contentions, or a waiver of any claims or defenses in this case. In addition, Defendant reserves the right to amend and/or supplement this Identification of Claim Construction Issues in response to Plaintiff's Identification of Claim Construction Issues, which may raise claim construction issues that Defendant did not previously perceive.

Prior art, whether or not now known to Defendant, may become relevant to the parties' Identification of Claim Construction Issues depending on positions that Plaintiff asserts and the claim constructions that the Court may determine. Defendant's ongoing investigations also may uncover additional prior art that may impact this Identification of Claim Construction Issues. Defendant reserve its right to modify this Identification of Claim Construction Issues, including without limitation, by adding or withdrawing issues and/or modifying the claim terms identified herein.

I. Identification of Claim Construction Issues

Subject to the foregoing, Defendant identifies the following terms in the asserted claims of the '175 Patent that require construction by the Court:

Asserted Claims	Issues Identified for Claim Construction
The meaning of the highlighted claim limitations, and particularly the emphasized claim terms.	
1. A bridge rope assembly configured to couple together a tree rope to a first bridge loop and a second bridge loop on a harness, the bridge rope assembly including:	The patentable weight to be accorded the claim preamble. “ configured to couple together a tree rope to a first bridge loop and a second bridge loop”
a main body comprising a rope having a first end and a second end, the main body having a splice therein to form an eye loop in the main body, the eye loop being configured to engage the first bridge loop, the main body comprising a first portion including the first end and a second portion including the second end, the first portion	“the eye loop being configured to engage the first bridge loop”

extending through the second portion of the main body such that the first end is positioned within the second portion adjacent to the second end; and	“the first end is positioned within the second portion <u>adjacent to</u> the second end”
a friction hitch being positioned on the m[a]in body between the second end and the eye loop, the friction hitch being configured to engage the second bridge loop, the friction hitch comprising a closed loop.	“the friction hitch <u>being configured to engage</u> the second bridge loop”
2. The bridge rope assembly according to claim 1, wherein the rope has a length from the first end to the second end between 72.0 inches and 126.0 inches.	
3. The bridge rope assembly according to claim 1, wherein a distance of the eye loop to the second end is between 24.0 inches and 40.0 inches.	“ <u>a distance of</u> the eye loop to the second end”
4. The bridge rope assembly according to claim 3, wherein the main body includes a stop knot in the second portion adjacent to the second end.	“a stop knot in the second portion <u>adjacent to</u> the second end”
5. The bridge rope assembly according to claim 4, further including a securing member being positioned on the main body at a juncture of the first and second ends to retain the first and second ends at a static position relative to each other.	
6. The bridge rope assembly according to claim 4, wherein the closed loop comprises a single rope being formed into the closed loop.	
11. The bridge rope assembly according to claim 1, wherein the main body is comprised of UHMWPE.	

Date: July 11, 2025

Respectfully submitted,

/s/ Brenton R. Babcock

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served via email
on July 11, 2025, by before 4:00 PM CDT upon:

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