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Subject: RE: Brain v. Avidbots - Exchange of Claim Terms and Proposed Constructions
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Counsel,

Pursuant to LPR 4.1(a), Brain provides its proposed claim terms to be construed along with its preliminary proposed constructions. Brain reserves the right to update its proposed claim terms and constructions, including based on new information and as the parties conduct the meet and confer process on claim construction.

Patent (Claim)	Term	Preliminary Proposed Construction
'347 Patent (Claims 1, 16, 17)	"virtual environment"	"Computer simulation of physical boundaries"
'347 Patent (Claims 1, 16, 17)	"virtual device"	"Computer simulation of a physical device"
'347 Patent (Claim 1, 16, 17)	"heuristic"	"Proceeding to a solution by trial and error or by rules that are only loosely defined"
'347 Patent (Claim 1, 16, 17)	"heuristic data"	Indefinite
'347 Patent (Claim 1, 16, 17)	"defining safety margins in the virtual environment to ensure the virtual device operates in a safe manner where possible collisions or damage to the semi-autonomous device or the target environment is reduced"	Indefinite
'347 Patent (Claim 1, 16, 17)	"the process of teaching ... the action sequence"	Indefinite
'347 Patent (Claim 1, 16, 17)	"a virtual representation of the semi-autonomous device"	Indefinite
'545 Patent (Claims 12, 13, 15)	"calculated efficiency"	Indefinite
'474 Patent (Claims 3, 14, 16, 20)		
'664 Patent (Claims 40, 45, 46)		
'550 Patent (Claims 4, 7, 8)		
'664 Patent (Claims 22, 30)	"predetermined efficiency"	Indefinite
'545 Patent (Claims 12, 13, 15)	"combining the intra-sector paths to define an inter-sector path"	Indefinite
'474 Patent (Claims 3, 16)	"combining the intra-sector path along each sector from the plurality of sectors to define the cleaning path."	
'550 Patent (Claims 4, 7, 8)		

	“combining each intra-sector path to collectively define the inter-sector path”	
'474 Patent (Claims 2, 3, 9, 14, 16, 20) '550 Patent (Claim 7) '664 Patent (22, 30, 40, 45, and 46)	“drive system”	“system configured to move the robot along the surface”
'539 Patent (Claims 1, 3, 4, 6)	“discretized”	“separate”

Thanks,
Daniel

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