

PERKINS COIE LLP

Kyle R. Canavera, Bar No. 314664

KCanavera@perkinscoie.com

John D. Esterhay, Bar No. 282330

JEsterhay@perkinscoie.com

Wei Yuan, Bar No. 315388

WYuan@perkinscoie.com

11452 El Camino Real, Ste 300

San Diego, California 92130-2080

Telephone: +1.858.720.5700

Facsimile: +1.858.720.5799

Attorneys for Plaintiffs

Beatbot Technology (USA) Co. Ltd.,

Deepwater Innovation Technology

(Hong Kong) Limited, Xingmai

Innovation Technology (Suzhou) Co.,

Ltd.

VINSON & ELKINS LLP

Steven D. Moore (State Bar No. 290875)

stevemoore@velaw.com

555 Mission Street, Suite 2000

San Francisco, CA 94105

Telephone: (415) 979-6900

KILPATRICK TOWNSEND & STOCKTON LLP

Kevin M. Bell (CO State Bar No. 39102) (*admitted pro hac vice*)

kbell@ktslaw.com

1400 Wewatta Street, Suite 600

Denver, CO 80202 USA

Telephone: 303 571 4000

Facsimile: 303 571 4321

Christopher S. Leah (GA State Bar No. 396228) (*admitted pro hac vice*)

cleah@ktslaw.com

1100 Peachtree St. NE, Suite 2800

Atlanta, GA 30309

Telephone: (404) 815-6500

Facsimile: (404) 815-6555

Kathleen R. Geyer (WA State Bar No. 55493) (*admitted pro hac vice*)

kgeyer@ktslaw.com

1420 Fifth Ave., Suite 3700

Seattle, WA 98101

Telephone: (206) 467-9600

Facsimile: (206) 623-6793

*Attorneys for Defendant and
Counterclaim Plaintiff ZODIAC
POOL SYSTEMS LLC*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BEATBOT TECHNOLOGY (USA)
CO. LTD., DEEPWATER
INNOVATION TECHNOLOGY
(HONG KONG) LIMITED, and
XINGMAI INNOVATION
TECHNOLOGY (SUZHOU) CO.,
LTD.,

Plaintiffs,

Case No. 3:25-cv-01946-GPC-JLB

**JOINT CLAIM CONSTRUCTION
HEARING STATEMENT, CHART,
AND WORKSHEET**

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v.
ZODIAC POOL SYSTEMS LLC,
Defendant.

Pursuant to the Court’s Case Management Order and Patent Local Rules 4.2, Plaintiffs Beatbot Technology (USA) Co., Ltd., Deepwater Innovation Technology (Hong Kong) Limited, and Xingmai Innovation Technology (Suzhou) Co., Ltd. (collectively “Beatbot”) and Defendant Zodiac Pool Systems LLC (“Zodiac”) (collectively “Parties”) hereby provides their Joint Claim Construction Chart, Joint Claim Construction Worksheet, and Joint Hearing Statement will respect to the construction of claims 1–3, 5–8, 12–14, and 19 of U.S. Patent No. 11,880,207 (“the ’207 patent”); claims 1–5 of U.S. Patent No. 11,262,766 (“the ’766 patent”) ; and claims 1–3 of U.S. Patent No. 11,003,191 (“the ’191 patent”) (collectively, “the Asserted Claims” or “the Patents-In-Suit”).

I. HEARING TIME, WITNESSES, AND ORDER OF PRESENTATION

The Parties do not believe that claim construction briefing or a claim construction hearing are necessary. The Parties identified one term for construction, and the Parties reached an agreed construction for that term. As a result, the Parties request that the Court vacate the following deadlines and hearing:

ACTIVITY	DATE
All discovery intended for use in the Claim Construction Hearing must be completed.	April 21, 2026
The parties must file simultaneously their Opening Claim Construction Briefs.	May 5, 2026
The parties must file simultaneously their Responsive Claim Construction Briefs.	May 19, 2026

ACTIVITY	DATE
Claim Construction and Tutorial Hearing	June 5, 2026

II. TERMS FOR CONSTRUCTION

The Parties identified one term for construction, and the Parties reached an agreed construction for that term. As a result, there are no terms for construction by the Court at the claim construction hearing.

III. CHART AND WORKSHEET

A Joint Claim Construction Worksheet is attached as Exhibit A. Because no terms are in dispute for construction by the Court, no Joint Claim Construction Chart is attached hereto.

1 Dated: March 24, 2026

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3 **PERKINS COIE LLP**

VINSON & ELKINS LLP

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5 By: /s/ Kyle R. Canavera

By: /s/ Steven D. Moore

6 Kyle R. Canavera, Bar No. 314664
7 KCanavera@perkinscoie.com
8 John D. Esterhay, Bar No. 282330
9 JEsterhay@perkinscoie.com
Wei Yuan, Bar No. 315388
WYuan@perkinscoie.com

VINSON & ELKINS LLP
Steven D. Moore (State Bar No. 290875)
stevemoore@velaw.com
555 Mission Street, Suite 2000
San Francisco, CA 94105
Telephone: (415) 979-6900

10 *Attorneys for Plaintiffs Beatbot*
11 *Technology (USA) Co. Ltd., Deepwater*
12 *Innovation Technology (Hong Kong)*
13 *Limited, And Xingmai Innovation*
Technology (Suzhou) Co., Ltd.

**KILPATRICK TOWNSEND &
STOCKTON LLP**
Kevin M. Bell (CO State Bar No. 39102)
(admitted pro hac vice)
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1400 Wewatta Street, Suite 600
Denver, CO 80202 USA
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396228) (admitted pro hac vice)
cleah@ktslaw.com
1100 Peachtree St. NE, Suite 2800
Atlanta, GA 30309
Telephone: (404) 815-6500
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Kathleen R. Geyer (WA State Bar No.
55493) (admitted pro hac vice)
kgeyer@ktslaw.com
1420 Fifth Ave., Suite 3700
Seattle, WA 98101
Telephone: (206) 467-9600
Facsimile: (206) 623-6793

Attorneys for Defendant and
Counterclaim Plaintiff ZODIAC POOL
SYSTEMS LLC

EXHIBIT A

PATENT CLAIM TERM	AGREED PROPOSED CONSTRUCTION	COURT'S CONSTRUCTION
“means for moving the vehicle body within the swimming pool” '191 Patent, Claims 1–3 '766 Patent, Claims 1–5 '207 Patent, Claim 1	Subject to 35 U.S.C. § 112, ¶ 6. <i>Function:</i> “moving the vehicle body within the swimming pool.” <i>Structure:</i> wheels, rollers, tracks, or other surface contacting members powered by a motor and the like; a toothed track drive that provides traction and propulsion for the vehicle; or a vacuum or liquid jet. '191 Patent, 3:31–43, 10:13–15, Figs. 9–10 '766 Patent, 3:31–43, 10:12–14, Figs. 9–10 '207 Patent, 3:33–45, 10:15–17, Figs. 9–10	