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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**

v.

ZODIAC POOL SYSTEMS LLC,

Defendant.

Beatbot, Ex.1016
Beatbot v. Zodiac, IPR2026-00202

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.

Beatbot, Ex.1016
Beatbot v. Zodiac, IPR2026-00202

Dated: March 24, 2026

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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. *Function*: "moving the vehicle body within the swimming pool." *Structure*: 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	

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