

Carpenter, Brian

From: Powers, Joseph A. <JAPowers@duanemorris.com>
Sent: Tuesday, June 9, 2026 3:45 PM
To: Nair, Arjun
Cc: CS_Zinser_Vivint; Greene, Bert A.; Thompson, Brad; Hughes, Richard; Schultz, Ramsey; Smith, Stephen J.; Carmack, Brandon
Subject: RE: Zinser v. Vivint - Plaintiff's Proposed Terms for Claim Construction



Arjun,

Thank you for your response.

Below please find Vivint's narrowed and updated list of terms for construction.

"the ringing of the doorbell" (claims 1, 14)
"triggering event" (claims 1, 21, 34)
"responsive to the triggering event" (claims 1, 21, 34)
"means, responsive to the ringing of the doorbell, for capturing visual and audio communications at the entry point" (claim 14)
"means for relaying at least a portion of the captured visual and audio communications to a cellular phone" (claim 14)
"means for rendering the least a portion of the captured visual and audio communications at the cellular phone" (claim 14)
"means for capturing audio communications at the cellular phone" (claim 14)
"means for relaying the audio communications from the cellular phone to the entry point" (claim 14)
"means for rendering the audio communications at the entry point" (claim 14)
"means for forwarding the captured visual and audio communications to means for data storage located onsite to the entry point" (claim 17)

“means for data storage located onsite to the entry point” (claim 17)
“means for forwarding the captured visual and audio communications to a video monitor located onsite to the entry point” (claim 18)
“proximity detector” (claims 21, 34)
“activation of the doorbell” (claims 21, 34)

Regards,

Joe

From: Nair, Arjun <ANair@coleschotz.com>
Sent: Monday, June 8, 2026 4:23 PM
To: Powers, Joseph A. <JAPowers@duanemorris.com>
Cc: CS_Zinser_Vivint <CS_Zinser_Vivint@coleschotz.com>; Greene, Bert A. <BGreene@duanemorris.com>; Thompson, Brad <BThompson@duanemorris.com>; Hughes, Richard <RHughes@duanemorris.com>; Schultz, Ramsey <RSchultz@duanemorris.com>; Smith, Stephen J. <SJSmith@duanemorris.com>; Carmack, Brandon <BCarmack@duanemorris.com>
Subject: RE: Zinser v. Vivint - Plaintiff's Proposed Terms for Claim Construction

Joe,

Plaintiff contends that the following claim elements from Claims 15-18 of the '191 Patent are governed by pre-AIA 35 U.S.C. § 112 ¶6:

Claim No.	Element Governed by pre-AIA 35 U.S.C. § 112 ¶6
14	“means, responsive to the ringing of the doorbell, for capturing visual and audio communications at the entry point”
14	“means for relaying at least a portion of the captured visual and audio communications to a cellular phone”
14	“means for rendering the least a portion of the captured visual and audio communications at the cellular phone”
14	“means for capturing audio communications at the cellular phone”
14	“means for relaying the audio communications from the cellular phone to the entry point”
14	“means for rendering the audio communications at the entry point”
17	“means for forwarding the captured visual and audio communications”
17	“means for data storage located onsite to the entry point”

18	"means for forwarding the captured visual and audio communications to a video monitor located onsite to the entry point"
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Regards,

Arjun



ARJUN NAIR

ASSOCIATE

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Legal Practice Assistant: Karyn Yahnke | 469.557.9390 x 3113 | kyahnke@coleschotz.com

From: Powers, Joseph A. <JAPowers@duanemorris.com>

Sent: Friday, June 5, 2026 11:47 AM

To: Nair, Arjun <ANair@coleschotz.com>

Cc: CS_Zinser_Vivint <CS_Zinser_Vivint@coleschotz.com>; Greene, Bert A. <BGreene@duanemorris.com>; Thompson, Brad <BThompson@duanemorris.com>; Hughes, Richard <RHughes@duanemorris.com>; Schultz, Ramsey <RSchultz@duanemorris.com>; Smith, Stephen J. <SJSmith@duanemorris.com>; Carmack, Brandon <BCarmack@duanemorris.com>

Subject: RE: Zinser v. Vivint - Plaintiff's Proposed Terms for Claim Construction

Counsel,

PLR 4-1(a) requires "each party shall simultaneously exchange a list of claim terms, phrases, or clauses which that party contends should be construed or found indefinite by the Court, and **identify any claim element which that party contends should be governed by 35 U.S.C. § 112(f).**"

PLR 4-2(a) then requires for "each **element** which any party contends is governed by 35 U.S.C. § 112(f), identify the structure(s), act(s), or material(s) corresponding to that **element**."

Your assertion below that "Claims 15, 16, 17, and 18 are governed by 35 U.S.C § 112 ¶ 6 (now § 112 (f))" does not comply with PLR 4-1(a). That is, "claims" are not "claim elements".

As you know, we are scheduled to exchange constructions next week on the 10th. Please identify as soon as possible the “claim element(s)” from claims 15, 16, 17 and 18, and from claim 14 from which those claims depend, that you contend are governed by 35 USC 35 U.S.C § 112 ¶ 6.

Please let me know if you have any questions.

Regards,

Joe

From: Nair, Arjun <ANair@coleschotz.com>

Sent: Thursday, May 21, 2026 6:01 PM

To: Greene, Bert A. <BGreene@duanemorris.com>; Thompson, Brad <BThompson@duanemorris.com>; Powers, Joseph A. <JAPowers@duanemorris.com>; Hughes, Richard <RHughes@duanemorris.com>; Schultz, Ramsey <RSchultz@duanemorris.com>; Smith, Stephen J. <SJSmith@duanemorris.com>; Carmack, Brandon <BCarmack@duanemorris.com>

Cc: CS_Zinser_Vivint <CS_Zinser_Vivint@coleschotz.com>

Subject: Zinser v. Vivint - Plaintiff's Proposed Terms for Claim Construction

Counsel,

Pursuant to the Court's Scheduling Order (Dkt. 21), below please find Plaintiff Duke W. Zinser's proposed term(s) for construction for U.S. Patent No. 7,583,191:

- “proximity detector”

Additionally, as stated in Plaintiff's Preliminary Infringement Contentions, Claims 15, 16, 17, and 18 are governed by 35 U.S.C § 112 ¶ 6 (now § 112 (f)).

Regards,

Arjun



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