IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

ADVANCE MEDICAL DESIGNS, INC.,	)	
Plaintiff/Counter-Defendant,	)	
v.	)	CASE NO. 1:22-cv-0789
CORBIN CLINICAL RESOURCES, LLC	)	
Defendant/Counter-Plaintiff.	)	

CORBIN CLINICAL RESOURCES, LLC'S AMENDED PROPOSED CLAIM CONSTRUCTION STATEMENT PURSUANT TO LOCAL RULE 805(1)(b)

Defendant/Counter-Plaintiff, Corbin Clinical Resources, LLC, ("Corbin"), by and through counsel, hereby provides its Proposed Claim Construction Statement pursuant to Local Rule 805(1)(b) and the Second Amended Scheduling Order [Dkt. 73].

(i) Identification of any special or uncommon meanings of words or phrases in the claim

Corbin identifies the following words or phrases in U.S. Patent Nos. 10,064,681 (the "'681 Patent"), 11,096,762 (the "'762 Patent"), 11,246,677 (the "'677 Patent"), 11,446,056 (the "'056 Patent") and 11,547,436 (the "'436 Patent") (together the ("Asserted Patents") that it asks be construed by this court because they have a special or uncommon meaning:

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Term	Proposed Definition
"a pair of stabilization members"	"two stabilization bars or other structures able to resist movement of the platform or displacement member in all directions except along the length of the probe"
"a pair of stabilization bars"	"two bars able to resist movement of the platform or displacement member in all directions except along the length of the probe"
"biopsy needle"	"a needle system capable of obtaining tissue or cell specimens"
"access needle"	"a needle providing access to the body comprising a lumen sized to receive a biopsy needle or other instrument therethrough"

Corbin does not believe any other words or phrases of any claim asserted in this matter have any special or uncommon meaning, especially in light of their respective specifications and prosecution histories. Accordingly, Corbin hereby states that no other terms of the Asserted Patents require construction by the Court, and all other terms should be given the plain and ordinary meaning ascribed to them by a person having ordinary skill in the art. Corbin reserves the right to propose additional terms for construction if warranted based on new information learned in discovery and/or through its own investigation, including by way of Advance Medical Designs' ("Advance Medical") further production of documents or other information. Corbin also reserves the right to propose additional terms or phrases for construction in response to Advance Medical's proposals disclosed under Local Rule 805(1)(c) and (d).

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(ii) (1) all references from the specification that support, describe, or explain each element of the claim; and
(2) all material in the prosecution history that describes or explains each element of the claim; and
(3) any extrinsic evidence that supports the proposed construction of the claim.

Claim Term and Proposed Construction	References to the Specification, Prosecution History and Extrinsic Evidence
"A Pair of Stabilization Members"	'681 Patent Specification: 1:26-2:8 2:12-60 4:6-6:4 8:6-11:36 11:64-12:65 13:25-28 13:57-4:11 14:29-46 Claims 1 -20 Figures 1-26(c) '681 Patent Prosecution History: Applicant Arguments/Remarks Made on Amendment dated May 8, 2018, in response to an April 2, 2018, Office Action; Applicant Initiated Interview Summary dated July 24, 2018 (May 4, 2018, Interview); Applicant Arguments/Remarks Made on Amendment dated January 3, 2018, in response to an October 6, 2017, Office Action.
	'677 Patent Specification: 1:30-2:12 2:15-2:62 4:9-6:6 8:9-11:36 11:64-12:65 13:25-28 13:57-14:11 14:29-46 Claims 1-43 Figures 1-26(c) '677 Patent Prosecution History: Applicant Arguments/Remarks Made on Amendment dated

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	September 8, 2021, in response to a July 22, 2021, Office Action.
	’762 Patent Specification: 1:28-2:10 2:14-2:62 4:9-6:6 8:9-11:36 11:64-12:65 13:25-28 13:57-14:11 14:29-46 Claims 1-43 Figures 1-26(c) ’762 Patent Prosecution History: N/A
	’056 Patent Specification: 1:38-2:20 2:27-6:33 8:66-10:63 12:64-17:23 17:32-54 18:47-52 19:57-35:30 Claims 1-30 Figures 1-38(d) ’056 Patent Prosecution History: N/A
	’436 Patent Specification: 1:40-2:23 2:27-6:33 8:66-10:63 13:3-17:31 17:41-63 18:55-60 19:65-35:43 Claims 1-30 Figures 1-38(d)

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	’436 Patent Prosecution History: Applicant Arguments/Remarks Made on Amendment dated August 25, 2022, in response to a May 25, 2022, Office Action.
	Extrinsic Evidence: The testimony of Dr. Matthew Allaway

Claim Term and Proposed Construction	References to the Specification, Prosecution History and Extrinsic Evidence
“A Pair of Stabilization Bars”	’681 Patent Specification: 1:26-2:8 2:12-60 4:6-6:4 8:6-11:36 11:64-12:65 13:25-28 13:57-4:11 14:29-46 Claims 1 -20 Figures 1-26(c) ’681 Patent Prosecution History: Applicant Arguments/Remarks Made on Amendment dated May 8, 2018, in response to an April 2, 2018, Office Action; Applicant Initiated Interview Summary dated July 24, 2018 (May 4, 2018, Interview); Applicant Arguments/Remarks Made on Amendment dated January 3, 2018, in response to an October 6, 2017, Office Action.
	’677 Patent Specification: 1:30-2:12 2:15-2:62 4:9-6:6 8:9-11:36 11:64-12:65 13:25-28 13:57-14:11 14:29-46 Claims 1-43 Figures 1-26(c)

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	’677 Patent Prosecution History: Applicant Arguments/Remarks Made on Amendment dated September 8, 2021, in response to a July 22, 2021, Office Action.
	’762 Patent Specification: 1:28-2:10 2:14-2:62 4:9-6:6 8:9-11:36 11:64-12:65 13:25-28 13:57-14:11 14:29-46 Claims 1-43 Figures 1-26(c) ’762 Patent Prosecution History: N/A
	’056 Patent Specification: 1:38-2:20 2:27-6:33 8:66-10:63 12:64-17:23 17:32-54 18:47-52 19:57-35:30 Claims 1-30 Figures 1-38(d) ’056 Patent Prosecution History: N/A
	’436 Patent Specification: 1:40-2:23 2:27-6:33 8:66-10:63 13:3-17:31 17:41-63 18:55-60

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	19:65-35:43 Claims 1-30 Figures 1-38(d)
	’436 Patent Prosecution History: Applicant Arguments/Remarks Made on Amendment dated August 25, 2022, in response to a May 25, 2022, Office Action.
	Extrinsic Evidence: The testimony of Dr. Matthew Allaway

Claim Term and Proposed Construction	References to the Specification, Prosecution History and Extrinsic Evidence
“Biopsy Needle”	’681 Patent Specification: 1:19-2:8 2:12-60 4:6-59 5:3-15 6:5-6:54 7:15-40 7:49-8:37 8:55-9:5 9:37-53 10:19-11:43 11:47-56 11:64-12:34 13:6-16 13:25-14:11 14:19-29 14:47-55 Claims 1, 2, 5, 10, 13, 14, 16, 17, 19, 20 Figures 2(c), 3, 4, 6-21, 23, 24, 25, 26A-C. ’681 Patent Prosecution History: Applicant Arguments/Remarks Made on Amendment dated May 8, 2018, in response to a April 2, 2018, Office Action; Applicant Initiated Interview Summary dated July 24, 2018 (May 4, 2018 Interview); Applicant Arguments/Remarks Made on Amendment dated January 3, 2018, in response to an October 6, 2017, Office Action.

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	’677 Patent Specification: 1:23-2:12 2:15-62 4:9-59 5:5-17 6:7-6:57 7:18-43 7:52-8:40 8:58-9:8 9:37-54 10:19-11:42 11:47-56 11:64-12:34 13:6-16 13:25-14:11 14:19-29 14:47-55 Claims 1—5, 11-17, 22-26, 30 Figures 2(c), 3, 4, 6-21, 23, 24, 25, 26A-C. ’677 Patent Prosecution History: Applicant Arguments/Remarks Made on Amendment dated September 8, 2021, in response to a July 22, 2021, Office Action
	’762 Patent Specification: 1:21-2:8 2:14-62 4:9-61 5:5-17 6:7-6:57 7:18-44 7:52-8:40 8:58-9:8 9:38-54 10:19-11:42 11:47-56 11:64-12:34 13:6-16 13:25-14:11 14:19-28 14:47-55 Claims 1-4, 13-15, 17, 18, 20-27, 29-33, 36-43 Figures 2(c), 3, 4, 6-21, 23, 24, 25, 26A-C.

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	’762 Patent Prosecution History: N/A
	’056 Patent Specification: Abstract 1:30-2:23 2:27-46 3:09-17 3:51-4:7 4:43-57 5:40-6:33 8:66-9:52 9:62-10:7 10:64-11:45 12:6-32 12:40-13:28 13:46-13:63 14:27-43 15:8-16:32 16:36-45 16:53-17:23 17:62-18:8 18:15-67 19:8-17 19:36-44 20:1-28 22:7-56 23:47-59 24:59-25:16 25:49-27:7 27:33-28:26 29:7-32 30:38-31:7 33:47-35:30 Claims 1, 3-6, 9-14, 16, 18-21, 25-30. Figures 2(c), 3, 4, 6-21, 23, 24, 25, 26A-C; 27-30, 32A-C, 34, 35 C-D, 36, 37A-C, 37E-H, 37J-L, 38A-D. ’056 Patent Prosecution History: N/A
	’436 Patent Specification:

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	1:32-2:25 2:29-48 3:11-19 3:53-4:9 4:45-59 5:43-6:37 9:3-55 9:66-10:11 11:1-50 12:11-38 12:46-13:34 13:52-14:2 14:32-48 15:14-16:38 16:43-52 16:60-17:31 18:4-14 18:23-19:8 19:16-25 19:44-52 20:9-36 22:15-64 23:55-67 25:1-25 25:58-27:17 27:43-28:37 29:18-43 30:49-31:18 33:58-35:43 Claims 1, 3-6, 10-13, 15-18, 22-26, 28-29. Figures 2(c), 3, 4, 6-21, 23, 24, 25, 26A-C; 27-30, 32A-C, 34, 35 C-D, 36, 37A-C, 37E-H, 37J-L, 38A-D. '436 Patent Prosecution History: Applicant Arguments/Remarks Made on Amendment dated August 25, 2022, in response to a May 25, 2022, Office Action
	Extrinsic Evidence: The testimony of Dr. Matthew Allaway

Claim Term and Proposed Construction	References to the Specification, Prosecution History and Extrinsic Evidence
"Access Needle"	'681 Patent Specification:

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	1:19-2:8 2:12-60 4:6-59 5:3-15 6:5-6:54 7:15-40 7:49-8:37 8:55-9:5 9:37-53 10:19-11:43 11:47-56 11:64-12:34 13:6-16 13:25-14:11 14:19-29 14:47-55 Claims 1, 2, 5, 10, 13, 14, 16, 17, 19, 20 Figures 2(c), 3, 4, 6-21, 23, 24, 25, 26A-C. '681 Patent Prosecution History: Applicant Arguments/Remarks Made on Amendment dated May 8, 2018, in response to a April 2, 2018, Office Action; Applicant Initiated Interview Summary dated July 24, 2018 (May 4, 2018 Interview); Applicant Arguments/Remarks Made on Amendment dated January 3, 2018, in response to an October 6, 2017, Office Action.
	'677 Patent Specification: 1:23-2:12 2:15-62 4:9-59 5:5-17 6:7-6:57 7:18-43 7:52-8:40 8:58-9:8 9:37-54 10:19-11:42 11:47-56 11:64-12:34 13:6-16 13:25-14:11 14:19-29 14:47-55

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	Claims 1—5, 11-17, 22-26, 30 Figures 2(c), 3, 4, 6-21, 23, 24, 25, 26A-C. ’677 Patent Prosecution History: Applicant Arguments/Remarks Made on Amendment dated September 8, 2021, in response to a July 22, 2021, Office Action
	’762 Patent Specification: 1:21-2:8 2:14-62 4:9-61 5:5-17 6:7-6:57 7:18-44 7:52-8:40 8:58-9:8 9:38-54 10:19-11:42 11:47-56 11:64-12:34 13:6-16 13:25-14:11 14:19-28 14:47-55 Claims 1-4, 13-15, 17, 18, 20-27, 29-33, 36-43 Figures 2(c), 3, 4, 6-21, 23, 24, 25, 26A-C. ’762 Patent Prosecution History: N/A
	’056 Patent Specification: Abstract 1:30-2:23 2:27-46 3:09-17 3:51-4:7 4:43-57 5:40-6:33 8:66-9:52 9:62-10:7 10:64-11:45 12:6-32

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	12:40-13:28 13:46-13:63 14:27-43 15:8-16:32 16:36-45 16:53-17:23 17:62-18:8 18:15-67 19:8-17 19:36-44 20:1-28 22:7-56 23:47-59 24:59-25:16 25:49-27:7 27:33-28:26 29:7-32 30:38-31:7 33:47-35:30 Claims 1, 3-6, 9-14, 16, 18-21, 25-30. Figures 2(c), 3, 4, 6-21, 23, 24, 25, 26A-C; 27-30, 32A-C, 34, 35 C-D, 36, 37A-C, 37E-H, 37J-L, 38A-D. ’056 Patent Prosecution History: N/A
	’436 Patent Specification: 1:32-2:25 2:29-48 3:11-19 3:53-4:9 4:45-59 5:43-6:37 9:3-55 9:66-10:11 11:1-50 12:11-38 12:46-13:34 13:52-14:2 14:32-48 15:14-16:38 16:43-52 16:60-17:31 18:4-14

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	18:23-19:8 19:16-25 19:44-52 20:9-36 22:15-64 23:55-67 25:1-25 25:58-27:17 27:43-28:37 29:18-43 30:49-31:18 33:58-35:43 Claims 1, 3-6, 10-13, 15-18, 22-26, 28-29. Figures 2(c), 3, 4, 6-21, 23, 24, 25, 26A-C; 27-30, 32A-C, 34, 35 C-D, 36, 37A-C, 37E-H, 37J-L, 38A-D. '436 Patent Prosecution History: Applicant Arguments/Remarks Made on Amendment dated August 25, 2022, in response to a May 25, 2022, Office Action
	Extrinsic Evidence: The testimony of Dr. Matthew Allaway

Corbin does not believe any other words or phrases of any claim asserted in this matter have any special or uncommon meaning, especially in light of the patent specifications and prosecution histories, and therefore does not propose that any other terms of the asserted patents be construed. Corbin asserts that all other terms should be given the plain and ordinary meaning ascribed to them by a person having ordinary skill in the art. Corbin reserves the right to provide references from the specification for any terms it proposes in the future based on new information learned in discovery and/or through its own investigation, including by way of Advance Medical's further production of documents or information disclosed under Local Rule 805(1)(c) and (d).

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Dated: May 23, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of May, 2023, a true and correct copy of the foregoing was electronically served on counsel for all parties properly registered to receive notice via the Court's CM/ECF system.

/s/ D. Jack Blum
Counsel for Corbin Clinical Resources, LLC

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

ADVANCE MEDICAL DESIGNS, INC., **Plaintiff,** **v.** **CORBIN CLINICAL RESOURCES, LLC** **Defendant.**	**Civ. A. No. 1:22-cv-00789-SAG** **JURY TRIAL DEMANDED**

ADVANCE MEDICAL DESIGNS, INC.'S SUPPLEMENTAL RESPONSIVE CLAIM CONSTRUCTION STATEMENT PURSUANT TO LOCAL RULE 805(1)(d)

Under the Court's Scheduling Order (DE 28-1) and Local Rule 805(1)(d), Advance Medical Designs, Inc. ("Advance Medical") provides its Responsive Claim Construction Statement. Advance Medical identifies terms it contends require construction and its proposed construction for said terms. Advance Medical also provides proposed constructions for terms identified by Corbin Clinical Resources, LLC ("Corbin"). Advance Medical also identifies the intrinsic and extrinsic evidence it intends to rely on for its proposed constructions. Advance Medical reserves the right to rely on evidence contained within, and referenced by, the extrinsic evidence identified below to either further support its proposed claim constructions or refute Defendant's proposed claim constructions. Advance Medical will produce its extrinsic evidence contemporaneously with this submission.

As Defendant has not yet served on Advance Medical its proposed constructions for the terms identified below, Advance Medical reserves the right to rely on additional evidence, including expert testimony, to refute or rebut Defendant's proposed constructions or extrinsic evidence.

Advance Medical contends that each claim term be given its plain and ordinary meaning as understood by a person having ordinary skill in the art at the time of the respective filing dates of the Asserted Patents when such person has considered the language of the Asserted Patents' claims, the teachings of the Asserted Patents' specifications, and the file histories of the Asserted Patents. Advance Medical reserves the right to rely on additional or different citations to the intrinsic evidence to support its proposed claim constructions.

Advance Medical also reserves the right to rely on the disclosure of any patents or patent applications related to the Asserted Patents, including but not limited to, patents upon which the Asserted Patents claim the benefit of a filing date, or any continuation, divisional, or continuation-in-part claiming the benefit of any filing date of the Asserted Patents. Moreover, although not specifically identified below, Advance Medical reserves the right to rely on any documents incorporated by reference in the specifications of the Asserted Patents because such documents are intrinsic evidence through their incorporation by reference even if the Asserted Patents do not rely upon them for their filing dates.

I. CORBIN'S IDENTIFIED CLAIM TERMS

Claim Term (Patent Claims)	**Advance Medical's Proposed Construction**	**Intrinsic/Extrinsic Evidence**
"a pair of stabilization members" ('762 Patent: claims 13 and 36; '677 Patent: claims 9, 10, 13, 28, and 29)	Plain and Ordinary Meaning	'681 Patent: Abstract; 1:26-2:8; 2:12-60; 4:6-6:4; 8:6-11:36; 11:64-12:65; 13:25-28; 13:57-14:11; 14:29-46; Claims 1-20; Figures 1-26(c). '681 Patent Prosecution History: Applicant Arguments/Remarks Made on Amendment dated May 8, 2018, in response to an April 2, 2018, Office Action; Applicant Initiated Interview Summary

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Claim Term (Patent Claims)	Advance Medical's Proposed Construction	Intrinsic/Extrinsic Evidence
		dated July 24, 2018 (May 4, 2018, Interview); Applicant Arguments/Remarks Made on Amendment dated January 3, 2018, in response to an October 6, 2017, Office Action. '762 Patent: Abstract; 1:28-2:10; 2:14-2:62; 4:9-6:6; 8:9-11:36; 11:64-12:65; 13:25-28; 13:57-14:11; 14:29-46; Claims 1-43; Figures 1-26(c). '677 Patent: Abstract; 1:30-2:12; 2:15-2:62; 4:9-6:6; 8:9-11:36; 11:64-12:65; 13:25-28; 13:57-14:11; 14:29-46; Claims 1-30; Figures 1-26(c). '677 Patent Prosecution History: Applicant Arguments/Remarks Made on Amendment dated September 8, 2021, in response to a July 22, 2021, Office Action; Applicant Arguments/Amendments Made on November 23, 2021. '056 Patent: Abstract; 1:38-2:20; 2:27-6:33; 8:66-10:63; 12:64-17:23; 17:32-54; 18:47-52; 19:18-35; 19:57-35:30; Claims 1-30; Figures 1-38(d). '436 Patent: Abstract; 1:40-2:23; 2:27-6:37; 9:3-10:67; 13:3-17:31; 17:41-63; 18:55-60; 19:26-43; 19:65-35:43; Claims 1-30; Figures 1-38(d). '436 Patent Prosecution History: Applicant Arguments/Remarks Made on

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Claim Term (Patent Claims)	Advance Medical's Proposed Construction	Intrinsic/Extrinsic Evidence
		Amendment dated August 25, 2022, in response to a May 25, 2022, Office Action. Merriam-Webster Dictionary Online: https://www.merriam-webster.com/dictionary/ (definition of "stabilize")
"a pair of stabilization bars" ('681 Patent: claims 1, 3, and 8)	Plain and Ordinary Meaning	'681 Patent: Abstract; 1:26-2:8; 2:12-60; 4:6-6:4; 8:6-11:36; 11:64-12:65; 13:25-28; 13:57-14:11; 14:29-46; Claims 1-20; Figures 1-26(c). '681 Patent Prosecution History: Applicant Arguments/Remarks Made on Amendment dated May 8, 2018, in response to an April 2, 2018, Office Action; Applicant Initiated Interview Summary dated July 24, 2018 (May 4, 2018, Interview); Applicant Arguments/Remarks Made on Amendment dated January 3, 2018, in response to an October 6, 2017, Office Action. '762 Patent: Abstract; 1:28-2:10; 2:14-2:62; 4:9-6:6; 8:9-11:36; 11:64-12:65; 13:25-28; 13:57-14:11; 14:29-46; Claims 1-43; Figures 1-26(c). '677 Patent: Abstract; 1:30-2:12; 2:15-2:62; 4:9-6:6; 8:9-11:36; 11:64-12:65; 13:25-28; 13:57-14:11; 14:29-46; Claims 1-30; Figures 1-26(c). '677 Patent Prosecution History: Applicant

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Claim Term (Patent Claims)	Advance Medical's Proposed Construction	Intrinsic/Extrinsic Evidence
		Arguments/Remarks Made on Amendment dated September 8, 2021, in response to a July 22, 2021, Office Action; Applicant Arguments/Amendments Made on November 23, 2021. '056 Patent: Abstract; 1:38-2:20; 2:27-6:33; 8:66-10:63; 12:64-17:23; 17:32-54; 18:47-52; 19:18-35; 19:57-35:30; Claims 1-30; Figures 1-38(d). '436 Patent: Abstract; 1:40-2:23; 2:27-6:37; 9:3-10:67; 13:3-17:31; 17:41-63; 18:55-60; 19:26-43; 19:65-35:43; Claims 1-30; Figures 1-38(d). '436 Patent Prosecution History: Applicant Arguments/Remarks Made on Amendment dated August 25, 2022, in response to a May 25, 2022, Office Action. Merriam-Webster Dictionary Online: https://www.merriam-webster.com/dictionary/ (definition of "stabilize")
"biopsy needle" ('762 Patent: claims 13-15, 20, 36-38, and 40; '677 Patent: claims 1, 11, 12, 13, 22, and 30; '056 Patent: claims 11 and 12; '436 Patent: claims 1, 4, 5, 12, 13, 16, 17, 23, 24, 28, and 29)	"a needle or needle system capable of obtaining tissue or cell specimens"	'681 Patent: Abstract; 1:19-2:8; 2:12-60; 4:6-59; 5:3-15; 6:5-6:54; 7:15-40; 7:49-8:37; 8:55-9:5; 9:37-53; 10:19-11:43; 11:47-56; 11:64-12:34; 12:43-53; 13:6-16; 13:25-14:67; Claims 1-20; Figures 1-26(c). '681 Patent Prosecution History: Applicant Arguments/Remarks Made on Amendment dated May 8,

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Claim Term (Patent Claims)	Advance Medical's Proposed Construction	Intrinsic/Extrinsic Evidence
		2018, in response to a April 2, 2018, Office Action; Applicant Initiated Interview Summary dated July 24, 2018 (May 4, 2018 Interview); Applicant Arguments/Remarks Made on Amendment dated January 3, 2018, in response to an October 6, 2017, Office Action. '762 Patent: Abstract; 1:21-2:10; 2:14-62; 4:9-61; 5:5-17; 6:7-6:57; 7:18-44; 7:52-8:40; 8:58-9:8; 9:38-54; 10:19-11:42; 11:47-56; 11:64-12:34; 12:43-53; 13:6-16; 13:25-14:67; Claims 1-43; Figures 1-26(c). '677 Patent: Abstract; 1:23-2:12; 2:15-62; 4:9-62; 5:5-17; 6:7-6:57; 7:18-43; 7:52-8:40; 8:58-9:8; 9:37-54; 10:19-11:42; 11:47-56; 11:64-12:34; 12:43-53; 13:6-16; 13:25-14:67; Claims 1-30 ; Figures 1-26(c). '677 Patent Prosecution History: Applicant Arguments/Remarks Made on Amendment dated September 8, 2021, in response to a July 22, 2021, Office Action; Applicant Arguments/Amendments Made on November 23, 2021. '056 Patent: Abstract; 1:30-2:23; 2:27-6:34; 8:66-12:32; 12:40-13:28; 13:46-13:63; 14:27-43; 15:8-16:32; 16:36-45; 16:53-17:23; 17:62-18:8; 18:15-67; 19:8-20:28; 22:7-56; 23:47-59; 24:59-25:16; 25:49-27:7; 27:33-28:26; 28:40-58; 29:7-31:7;

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Claim Term (Patent Claims)	Advance Medical's Proposed Construction	Intrinsic/Extrinsic Evidence
		33:47-35:30; Claims 1-30; Figures 1-38(d). '436 Patent: Abstract; 1:32-2:25; 2:29-48; 3:11-19; 3:53-4:9; 4:33-40; 4:45-59; 5:1-8; 5:43-6:37; 9:3-55; 9:66-10:11; 11:1-50; 12:11-38; 12:46-13:34; 13:52-14:2; 14:32-48; 15:14-16:38; 16:43-52; 16:60-17:31; 18:4-14; 18:23-19:8; 19:16-20:36; 22:15-64; 23:55-67; 25:1-25; 25:58-27:17; 27:43-28:37; 29:18-43; 29:62-30:19; 30:49-31:18; 33:58-35:43; Claims 1-30; Figures 1-38(d). '436 Patent Prosecution History: Applicant Remarks and Amendments dated August 25, 2022, in response to a May 25, 2022, Office Action; Notice of Allowance dated October 4, 2022; Applicant-Examiner Interview dated November 15, 2022; Applicant Remarks and Amendments dated November 15, 2022.
"access needle" ('681 Patent: claims 1 and 17; '762 Patent: claims 13-15 and 36-38; '677 Patent: claims 1, 3, 4, 13, 16, 22, and 25; '056 Patent: claims 1, 6, 10 and 13; '436 Patent: claims 1, 6, 11, 13, 18, 23-25, and 28-30)	"a needle providing access to the body"	'681 Patent: Abstract; 1:19-2:8; 2:12-60; 4:6-59; 5:3-15; 6:5-6:54; 7:15-40; 7:49-8:37; 8:55-9:5; 9:37-53; 10:19-11:43; 11:47-56; 11:64-12:34; 12:43-53; 13:6-16; 13:25-14:67; Claims 1-20; Figures 1-26(c). '681 Patent Prosecution History: Applicant Arguments/Remarks Made on Amendment dated May 8, 2018, in response to a April 2,

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Claim Term (Patent Claims)	Advance Medical's Proposed Construction	Intrinsic/Extrinsic Evidence
		2018, Office Action; Applicant Initiated Interview Summary dated July 24, 2018 (May 4, 2018 Interview); Applicant Arguments/Remarks Made on Amendment dated January 3, 2018, in response to an October 6, 2017, Office Action. '762 Patent: Abstract; 1:21-2:10; 2:14-62; 4:9-61; 5:5-17; 6:7-6:57; 7:18-44; 7:52-8:40; 8:58-9:8; 9:38-54; 10:19-11:42; 11:47-56; 11:64-12:34; 12:43-53; 13:6-16; 13:25-14:67; Claims 1-43; Figures 1-26(c). '677 Patent: Abstract; 1:23-2:12; 2:15-62; 4:9-62; 5:5-17; 6:7-6:57; 7:18-43; 7:52-8:40; 8:58-9:8; 9:37-54; 10:19-11:42; 11:47-56; 11:64-12:34; 12:43-53; 13:6-16; 13:25-14:67; Claims 1-30 ; Figures 1-26(c). '677 Patent Prosecution History: Applicant Arguments/Remarks Made on Amendment dated September 8, 2021, in response to a July 22, 2021, Office Action; Applicant Arguments/Amendments Made on November 23, 2021. '056 Patent: Abstract; 1:30-2:23; 2:27-6:34; 8:66-12:32; 12:40-13:28; 13:46-13:63; 14:27-43; 15:8-16:32; 16:36-45; 16:53-17:23; 17:62-18:8; 18:15-67; 19:8-20:28; 22:7-56; 23:47-59; 24:59-25:16; 25:49-27:7; 27:33-28:26; 28:40-58; 29:7-31:7;

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Claim Term (Patent Claims)	Advance Medical's Proposed Construction	Intrinsic/Extrinsic Evidence
		33:47-35:30; Claims 1-30; Figures 1-38(d). '436 Patent: Abstract; 1:32-2:25; 2:29-48; 3:11-19; 3:53-4:9; 4:33-40; 4:45-59; 5:1-8; 5:43-6:37; 9:3-55; 9:66-10:11; 11:1-50; 12:11-38; 12:46-13:34; 13:52-14:2; 14:32-48; 15:14-16:38; 16:43-52; 16:60-17:31; 18:4-14; 18:23-19:8; 19:16-20:36; 22:15-64; 23:55-67; 25:1-25; 25:58-27:17; 27:43-28:37; 29:18-43; 29:62-30:19; 30:49-31:18; 33:58-35:43; Claims 1-30; Figures 1-38(d). '436 Patent Prosecution History: Applicant Remarks and Amendments dated August 25, 2022, in response to a May 25, 2022, Office Action; Notice of Allowance dated October 4, 2022; Applicant-Examiner Interview dated November 15, 2022; Applicant Remarks and Amendments dated November 15, 2022.

II. ADVANCE MEDICAL'S IDENTIFIED CLAIM TERMS

Claim Term (Patent Claims)	Advance Medical's Proposed Construction	Intrinsic/Extrinsic Evidence
"an upper mount and a lower mount configured to couple to each other, the lower mount configured to engage the transrectal probe"	"an upper mount and a lower mount configured to independently engage a transrectal probe and couple to an upper mount"	'681 Patent: Abstract; FIGS. 1-7; FIGS. 26A-26C; 2:23-32; 4:13-15; 5:16-23; 5:40-46; 5:48-50; 6:48-7:14; 8:38-9:40; 9:54-65; 10:4-18; 12:27-42; 14:30-46; 14:56-67; 15:10-32; 15:45-47; 16:18-21.

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Claim Term (Patent Claims)	Advance Medical's Proposed Construction	Intrinsic/Extrinsic Evidence
('681 Patent: claim 1)		File History of U.S. App. No. 14/677,286: Response to Office Action dated April 2, 2018 at 2; Applicant-Initiated Interview Summary of May 4, 2018 interview.
"platform configured to slide (on the [a] pair of stabilization bars [members], relative to the base, relative to the pair of stabilization members, within the channel)" ('681 Patent: claim 1; '762 Patent: claims 13 and 36; '677 Patent: claims 1, 13, and 22)	"the platform configured to slide (on the pair of stabilization bars [members], relative to the base, relative to the pair of stabilization members, within the channel) while the access needle is engaged with the platform."	'681 Patent: Abstract; FIGS. 3-4; FIG. 6; FIGS. 26A-26C; 4:9-13; 4:30-42; 4:54-59; 5:16-17; 5:27-31; 5:46-47; 5:54-67; 6:5-10; 6:29-32; 6:37-47; 9:36-40; 9:54-57; 10:8-12; 12:27-65; 13:57-62; 14:33-36; 15:10-38. '762 Patent: Abstract; FIGS. 3-4; FIG. 6; FIGS. 26A-26C; 4:12-16; 4:32-44; 4:56-61; 5:18-19; 5:29-33; 5:48-49; 5:56-67; 6:7-12; 6:32-35; 6:40-50; 9:38-41; 9:55-58; 10:9-13; 12:27-65; 13:57-62; 14:33-36; 15:11-27; 15:44-48; 16:5-16; 16:34-37; 17:8-10; 17:35-18:12. '677 Patent: Abstract; FIGS. 3-4; FIG. 6; FIGS. 26A-26C; 4:12-16; 4:31-44; 4:56-61; 5:18-19; 5:29-33; 5:48-49; 5:56-67; 6:7-13; 6:32-35; 6:40-50; 9:38-41; 9:55-58; 10:9-13; 12:27-65; 13:57-62; 14:33-36; 15:10-27; 15:59-16:9; 16:34-55. File History of U.S. App. No. 14/677,286: Response to Office Action dated October 6, 2017 at 5-7; Response to Office Action dated April 2, 2018 at 7-8.

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Claim Term (Patent Claims)	Advance Medical's Proposed Construction	Intrinsic/Extrinsic Evidence
		File History of U.S. App. No. 16/377,754: Response to Office Action dated September 26, 2019 at 7-9; Response to Office Action dated January 17, 2020 at 11. File History of U.S. App. No. 14/874,104: Response to Office Action dated July 23, 2019 at 9-11 and 13.
"so as to displace the access needle along the at least a portion of the length" ('681 Patent: claim 1)	"so as to move the access needle from a first position to a second position between the front portion and back portion of the stabilization bars "	'681 Patent: Abstract; FIGS. 3-4; FIG. 6; FIGS. 26A-26C 2:26-32; 2:35-39; 4:24-46; 4:54-59; 5:54-63; 8:55-9:5; 9:37-57; 10:4-12; 12:43-65; 15:11-36; 15:42-45; 16:28-53. File History of U.S. App. No. 14/677,286: Response to Office Action dated October 6, 2017 at 6-7; Response to Office Action dated April 2, 2018 at 6-8. Merriam-Webster Dictionary Online: https://www.merriam-webster.com/dictionary/ (definition of "displace")
"the access needle being centrally positioned between the pair of stabilization members when the access needle is engaged with the platform" ('762 Patent: claim 13)	"the access needle being centrally positioned in the space separating the pair of stabilization members when the access needle is engaged with the platform"	'762 Patent: FIGS. 3-4; FIG. 6; FIGS. 26A-26C; 9:38-54; 16:5-17; 16:61-17:7. File History of U.S. App. No. 14/677,286, Response to Office Action dated October 6, 2017 at 7; Response to Office Action dated April 2, 2018 at 8. Merriam-Webster Dictionary Online: https://www.merriam-webster.com/dictionary/ (definition of "between").

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Claim Term (Patent Claims)	Advance Medical's Proposed Construction	Intrinsic/Extrinsic Evidence
"lumen sized to receive a biopsy needle there through" ('677 Patent: claims 1, 13, and 22)	Indefinite due to ambiguity/lack of written support	'677 Patent: 7:55-58; 13:32-35; 13:42-44; 15:10-15:27; 15:59-16:9; 16:34-55.
"distal point of the pair of stabilization members is offset from (a fastener of the base portion, the mount of the base)" ('677 Patent: claims 10 and 29)	Indefinite due to ambiguity/lack of written support	'677 Patent: FIG. 5; FIG. 20; 9:59-10:4; 11:6-13; 15:51-54; 16:30-33; 17:7-10. Merriam-Webster Dictionary Online: https://www.merriam-webster.com/dictionary/ (definition of "distal" and "offset"). Dictionary.com: https://www.dictionary.com/ (definition of "distal" and "offset"). File History of U.S. App. No. 16/377,597: Response to Office Action dated January 22, 2020 at 4-8.
"coupling [securing] the access needle to the one of the plurality of needle receiving ports of the displacement member of the transperineal biopsy guide such that a position and angle of the access needle relative to the displacement member is retained [maintained]" ('436 Patent: claims 1, 13, 24)	"inserting the access needle into one of the plurality of needle receiving ports, wherein the needle receiving port is configured to support the access needle at an angle and position relative to the displacement member"	'436 Patent: Abstract; 1:32-2:25; 2:29-48; 3:11-19; 3:53-4:9; 4:33-40; 4:45-59; 5:1-8; 5:43-6:37; 9:3-55; 9:66-10:11; 11:1-50; 12:11-38; 12:46-13:34; 13:52-14:2; 14:32-48; 15:14-16:38; 16:43-52; 16:60-17:31; 18:4-14; 18:23-19:8; 19:16-20:36; 22:15-64; 23:55-67; 25:1-25; 25:58-27:17; 27:43-28:37; 29:18-43; 29:62-30:19; 30:49-31:18; 33:58-35:43; Claims 1-30; Figures 1-38(d).

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Claim Term (Patent Claims)	Advance Medical's Proposed Construction	Intrinsic/Extrinsic Evidence
		'436 Patent Prosecution History: Applicant Remarks and Amendments dated August 25, 2022, in response to a May 25, 2022, Office Action; Notice of Allowance dated October 4, 2022; Applicant-Examiner Interview dated November 15, 2022; Applicant Remarks and Amendments dated November 15, 2022.
"wherein securing the access needle to the one of a plurality of needle receiving ports of the displacement member includes inserting a structure that is engaged with the tubular shaft of the access needle into the one of a plurality of needle receiving ports" ('436 Patent: claim 25)	"a portion of the access needle other than the tubular shaft is inserted into a corresponding feature within one of the plurality of needle receiving ports such that the access needle remains coupled with the displacement member"	'436 Patent: Abstract; 1:32-2:25; 2:29-48; 3:11-19; 3:53-4:9; 4:33-40; 4:45-59; 5:1-8; 5:43-6:37; 9:3-55; 9:66-10:11; 11:1-50; 12:11-38; 12:46-13:34; 13:52-14:2; 14:32-48; 15:14-16:38; 16:43-52; 16:60-17:31; 18:4-14; 18:23-19:8; 19:16-20:36; 22:15-64; 23:55-67; 25:1-25; 25:58-27:17; 27:43-28:37; 29:18-43; 29:62-30:19; 30:49-31:18; 33:58-35:43; Claims 1-30; Figures 1-38(d). '436 Patent Prosecution History: Applicant Remarks and Amendments dated August 25, 2022, in response to a May 25, 2022, Office Action; Notice of Allowance dated October 4, 2022; Applicant-Examiner Interview dated November 15, 2022; Applicant Remarks and Amendments dated November 15, 2022.
"wherein securing the access needle to the one of a plurality of needle receiving ports of the displacement member restricts rotation of	"wherein a portion of the access needle engages corresponding features of the one of the plurality of needle receiving ports of the	'436 Patent: Abstract; 1:32-2:25; 2:29-48; 3:11-19; 3:53-4:9; 4:33-40; 4:45-59; 5:1-8; 5:43-6:37; 9:3-55; 9:66-10:11; 11:1-50; 12:11-38; 12:46-

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Claim Term (Patent Claims)	Advance Medical's Proposed Construction	Intrinsic/Extrinsic Evidence
the access needle relative to the displacement member" ('436 Patent: claim 30)	displacement member such that the access needle is restrained from rotating"	13:34; 13:52-14:2; 14:32-48; 15:14-16:38; 16:43-52; 16:60-17:31; 18:4-14; 18:23-19:8; 19:16-20:36; 22:15-64; 23:55-67; 25:1-25; 25:58-27:17; 27:43-28:37; 29:18-43; 29:62-30:19; 30:49-31:18; 33:58-35:43; Claims 1-30; Figures 1-38(d). '436 Patent Prosecution History: Applicant Remarks and Amendments dated August 25, 2022, in response to a May 25, 2022, Office Action; Notice of Allowance dated October 4, 2022; Applicant-Examiner Interview dated November 15, 2022; Applicant Remarks and Amendments dated November 15, 2022.

Dated: June 22, 2023

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CERTIFICATE OF SERVICE

I hereby certify that on June 22, 2023, I caused to be served a true and correct copy of the foregoing **ADVANCE MEDICAL DESIGNS, INC.'S SUPPLEMENTAL RESPONSIVE CLAIM CONSTRUCTION STATEMENT PURSUANT TO LOCAL RULE 805(1)(d)** by email to all attorneys of record:

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