

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BECKMAN COULTER, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 24-945-CFC-EGT
	)	
CYTEK BIOSCIENCES, INC.,	)	
	)	
Defendant.	)	

AMENDED JOINT CLAIM CONSTRUCTION CHART

Pursuant to Paragraph 17 of the Court’s Scheduling Order (D.I. 25), Plaintiff Beckman Coulter, Inc. and Defendant Cytek Biosciences, Inc. respectfully submit their Amended Joint Claim Construction Chart identifying for the Court the terms/phrases of the asserted claims of U.S. Patent No. 10,330,582 (“’582 Patent”), 11,703,443 (“’443 Patent”), 12,174,106 (“’106 Patent”), and 12,174,107 (“’107 Patent”) (the “Asserted Patents”) for which the parties seek construction, as well as each party’s proposed construction of the disputed claim language with citations only to the intrinsic evidence in support of their respective proposed constructions. (See Exhibit A.)¹

¹ Cytek Position: Cytek identified additional terms in its May 14, 2025 Identification of Claim Construction Issues and Proposed Constructions, including terms Cytek considers indefinite, that it has reserved for later resolution, if necessary, including consistent with Cytek’s understanding of the Court’s preference for hearing

Copies of the patents-in-suit are attached as Exhibits B through E.

- Exhibit B is U.S. Patent No. 10,330,582 (the “582 Patent”)
- Exhibit C is U.S. Patent No. 11,703,443 (the “443 Patent”)
- Exhibit D is U.S. Patent No. 12,174,106 (the “106 Patent”)
- Exhibit E is U.S. Patent No. 12,174,107 (the “107 Patent”)

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indefiniteness challenges at a later stage of the case. These additional terms are not included within Exhibit A.

Beckman Coulter Position: Consistent with the Court’s practice, the parties agreed that only ten Cytek terms would be construed. Accordingly, Beckman Coulter disagrees that Cytek may properly reserve other claim construction arguments for later in the proceeding.

Exhibit A to Joint Claim Construction Chart

Agreed Constructions²

Claim Terms/Phrases	Construction³
Preambles “A wavelength division multiplexer (WDM) for a flow cytometer comprising” (’443 Patent, cls. 1, 2, 3, 4, 6, 7, 9, 10, 16, 18; ’106 Patent, cls. 1, 2, 13, 17; ’107 Patent, cls. 1, 5, 10, 16, 17, 26) “A flow cytometer comprising” (’443 Patent, cls. 11, 13, 15, 16, 17, 18; ’106 Patent, cls. 1, 2, 10, 11, 13, 14, 17; ’107 Patent, cls. 1, 3, 5, 7, 9-12, 14, 16-18, 26, 27, 29, 30; ’582 Patent, cls. 1, 20) “An optical subsystem for a flow cytometer, the optical subsystem comprising” (’582 Patent, cls. 1, 2, 3, 6, 14, 15, 17, 18, 20, 21, 22, 23, 25, 26)	Preambles are limiting.

² The Parties respectfully request, to the extent the Court deems appropriate, that the Court include the parties’ agreed-upon claim constructions in its Claim Construction Order.

³ The parties agree that the preambles are limiting.

Cytek Position: Additionally, Cytek had proposed constructions for these terms and reserves its right to pursue these constructions, including to raise potential disputes related to the scope of these terms for resolution if necessary.

Exhibit A to Joint Claim Construction Chart

Disputed Claim Terms^{4,5,6}

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
"first" / "second"	'582 Patent, cls. 1, 3, 6, 14, 15, 17, 18, 20, 21, 22, 25, 26; '106 Patent, cl. 1;	No construction necessary; plain and ordinary meaning.	'582 Patent, Abstract; 3:37-48; 4:2-33; 4:34-60; 4:61-5:22; 5:23-46; 5:47-	First: "initial [curved mirror / focusing optical element / filter/ optical filter /	'582 Patent, 44:58-61; 45:4-15; 45:32-38; 46:17-26; 46:36-42; FIG. 25

Beckman Coulter Position: As explained above, consistent with the Court's practice, the parties agreed that only ten Cytek terms would be construed. Beckman Coulter therefore disagrees that Cytek may properly reserve other claim construction arguments for later in the proceeding.

⁴ The Asserted Patents share a common specification. Where the parties identify intrinsic citations within the '582 Patent specification, it is understood that the parties are also identifying parallel disclosures in the specifications for the '443, '106, and '107 Patents.

⁵ All Beckman Coulter citations referencing a figure or table incorporate by reference that figure or table. Beckman Coulter reserves the right to rely on any intrinsic evidence identified and/or relied upon by Cytek. Beckman Coulter reserves the right to amend, supplement, or modify its proposed constructions and intrinsic evidence, including to rely upon additional intrinsic evidence in its claim construction briefing.

⁶ Cytek reserves the right to rely on any intrinsic evidence identified and/or relied upon by Beckman Coulter. Cytek further reserves its right to supplement the attached Joint Claim Construction Chart with additional intrinsic evidence and to rely upon additional intrinsic evidence in its claim construction briefing.