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11 Attorneys for Plaintiff
Therabody, Inc.

12 UNITED STATES DISTRICT COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
14 SOUTHERN DIVISION

15 THERABODY, INC.,

16 Plaintiff,

17 v.

18 HYPER ICE, INC.,

19 Defendant.
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Case No. 8:26-cv-00003-JWH-KES

**PLAINTIFF'S PATENT L.R. 4-1
PROPOSED TERMS FOR
CONSTRUCTION**

1 Pursuant to Patent L.R. 4-1 and the Court's Case Management Order, Plaintiff
2 Therabody, Inc. ("Therabody") hereby provides the following proposed terms for
3 construction.

4 These proposed terms are based on Therabody's current knowledge and
5 understanding of Defendant's accused products, the prior art, and Defendant's
6 invalidity contentions. Accordingly, Therabody cannot yet determine all possible
7 terms that may require construction. Therabody reserves the right to supplement,
8 amend, or otherwise modify these proposed terms if further clarification and/or
9 additional information becomes available.

10 With respect to the asserted claims, Therabody presently contends that only
11 the phrase "transverse to" requires construction.

12 Therabody reserves the right to request constructions of all or part of any claim
13 terms, phrases, and/or clauses requested by Defendant to be construed.

14 DATED: August 10, 2026

RENNER OTTO

15 By: /s/ Mark C. Johnson

16 Mark C. Johnson (Pro Hac Vice)

17 Sarah L. Boone (Pro Hac Vice)

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20 Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2026, a true and correct copy of
PLAINTIFF’S PATENT L.R. 4-1 PROPOSED TERMS FOR CONSTRUCTION is
being served by transmission via electronic mail to the following counsel of record
for Defendant.

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