

APPENDIX 2

Appendix 2

Preliminary Ineligibility Contentions – U.S. Patent No. 6,854,287

The following chart contains Vertiv’s preliminary Ineligibility Contentions demonstrating that Claims 1-9 of U.S. Patent No. 6,854,287 (the “‘287 patent”) are patent-ineligible under 35 U.S.C. § 101 pursuant to the Court’s Standing Order Regarding Subject Matter Eligibility Contentions. Nothing in this claim chart should be construed as an admission regarding infringement, either literally or under the doctrine of equivalents, or as an admission regarding Vertiv’s understanding of the proper scope of the Asserted Claims. Given Plaintiff’s vague and ambiguous infringement contentions, the exemplary citations herein necessarily account for a variety of possible infringement arguments and claim constructions. Vertiv reserves the right to rely on additional citations or sources of evidence that also may be applicable, or that may become applicable in light of claim construction, changes in Plaintiff’s infringement contentions, and/or information obtained during discovery as the case progresses. Various positions put forth in this document are predicated on Plaintiff’s overly broad interpretation of its claims as evidenced by the infringement allegations received to date. Those positions are not intended to and do not necessarily reflect Vertiv’s interpretation of the true and proper scope of Plaintiff’s claims, and Vertiv reserves the right to adopt claim construction positions that differ from or even conflict with various positions put forth in this document.

Vertiv reserve the right to amend or supplement this claim chart at a later date pursuant to the Docket Control Order issued by the Court on September 3, 2024 (Dkt. No. 60).

A. Chart Identifying Exception to Eligibility, Representative Claims, Relevant Industry and Time Period, Materials That Support Patent Ineligibility, And Relevant Case Law

<p>Exception To Eligibility</p>	<p>The Asserted Claims of the ‘287 patent are directed to an abstract idea. Specifically, the Asserted Claims are directed to the abstract idea of collecting and analyzing data to evaluate a cooling system and make appropriate adjustments. <i>See, e.g.</i>, ‘287 patent at 2:33-44; Fig. 5.</p> <p>The claims of the ‘287 patent itself establish that they are directed to collecting and analyzing data to evaluate a cooling system and make appropriate adjustments. <i>See, e.g.</i>, ‘287 patent at claim 1 (“sensing temperatures at one or more locations in said room”; “controlling at least one of the temperature of said cooling fluid and said air delivery by said plurality of heat exchanger units to said room in response to said sensed temperatures at said one or more locations”); <i>id.</i> at claim 2 (“varying an output of said air conditioning unit to control the temperature of said cooling fluid”); <i>id.</i> at claim 3 (“determining whether the sensed temperatures at one or more locations in said room are within a predetermined range”); <i>id.</i> at claim 4 (“varying the cooling fluid temperature in response to the sensed temperatures at one or more locations in said room being outside of said predetermined range”); <i>id.</i> at claim 5 (“increasing said cooling fluid temperature in response to a sum of the sensed temperatures at one or more locations being below said predetermined range”); <i>id.</i> at claim 6 (“decreasing said cooling fluid temperature in response to a sum of the sensed temperatures at one or more locations being above said predetermined range”); <i>id.</i> at claim 7 (“metering the flow of cooling fluid through each of said plurality of heat exchanger units with a plurality of valves positioned along respective cooling fluid lines configured to channel cooling fluid from the air conditioning unit to the plurality of heat exchanger units”); <i>id.</i> at claim 8 (“metering the flow of cooling fluid through said plurality of heat exchanger units with a plurality of pumps positioned along respective cooling fluid lines configured to channel cooling fluid from the air conditioning unit to the plurality of heat exchanger units”); <i>id.</i> at claim 9 (“manipulating a mass flow rate of the cooling fluid supplied to the plurality of heat exchanger units in substantially independent manners with respect to each of the plurality of heat exchanger units”).</p> <p>Collecting and analyzing data to evaluate a cooling system and make appropriate adjustments is an abstract idea. <i>See, e.g., Gottschalk v. Benson</i>, 409 U.S. 63, 67 (1972) (“[M]ental processes, and abstract intellectual concepts are not patentable, as they are the basic tools of scientific and technological work.”); <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350, 1353 (Fed. Cir. 2016) (“[W]e have treated collecting information, including when limited to particular content (which does not change its character as information), as within</p>
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	<p>the realm of abstract ideas”); <i>see also id.</i> at 1354 (“[W]e have treated analyzing information by steps people go through in their minds, or by mathematical algorithms, without more, as essentially mental processes within the abstract-idea category.” . . . “[W]e have recognized that merely presenting the results of abstract processes of collecting and analyzing information, without more (such as identifying a particular tool for presentation), is abstract as an ancillary part of such collection and analysis.”); <i>see also Parker v. Flook</i>, 437 U.S. 584 (1978) (process involving calculating and updating alarm limit values for alarms that monitor process variables (such as temperature) during chemical process constitutes an abstract idea).</p> <p>In any building where humans live, humans monitor the atmospheric conditions within the building and make adjustments as necessary. Such a concept is as basic as a person living in a house with windows that can be open and closed. The person senses or monitors the temperature within one or more rooms of the house. If the temperature is too high and the person feels hot, the person can open the windows so that cooling air from the outside is supplied into the building. If the temperature is too low and the person feels cold, the person can close the windows, thus cutting off the flow of air from the outside. It may be desirable for different rooms or locations in the house to have different temperatures. The person monitors the rooms and adjusts the windows as necessary to achieve the desired temperature distribution within different rooms or locations in the house.</p> <p>A person living in a house equipped with conventional window air conditioning units performs similar monitoring, analysis, and adjustment steps to control the atmospheric conditions within rooms or regions of the house. The person senses or monitors the temperature within one or more rooms of the house. If the temperature is too high and the person feels hot, the person can turn on the window air conditioning unit in the room or adjust a control to a higher setting so that more coolant is supplied to the heat exchanger of the unit to cool the air supplied to the room. If the temperature is too low and the person feels cold, the person can turn off the unit or adjust a control to a lower setting so that less coolant is supplied to the heat exchanger of the unit so that less heat is removed from the air supplied to the room. The person can repeat this process for multiple rooms, individually manipulating the air conditioning unit for each room to achieve a desired temperature range within the room.</p>
Representative Claims	Claim 1 is representative of each of the other Asserted Claims of the ‘287 Patent.

Relevant Industry and Time Period	The relevant industry is cooling systems for buildings. For purposes of these Subject Matter Eligibility Contentions, Vertiv has assumed the relevant time period is 2002, based on Plaintiff’s asserted priority date and the filing date of the application that issued the ‘287 Patent.
Material Supporting Patent Ineligibility¹	<ul style="list-style-type: none"> • Vertiv’ Invalidation Contentions and all materials cited therein • Exhibits B-1 to B-21 of Appendix 2 and all materials cited therein
Relevant Legal Authorities²	<p><u>General Section 101 authority:</u></p> <ul style="list-style-type: none"> • <i>Gottschalk v. Benson</i>, 409 U.S. 63 (1972) • <i>Parker v. Flook</i>, 437 U.S. 584 (1978) • <i>Alice Corp. Pty. v. CLS Bank Int’l</i>, 573 U.S. 208 (2014) • <i>Berkheimer v. HP Inc.</i>, 881 F.3d 1360 (Fed. Cir. 2018) • <i>Secured Mail Sols. LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>RecogniCorp, LLC v. Nintendo Co., Ltd.</i>, 855 F.3d 1322 (Fed. Cir. 2017) • <i>In re TLI Commc’ns LLC Patent Litig.</i>, 823 F.3d 607 (Fed. Cir. 2016) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Bascom Global Internet Servs., Inc. v. AT&T Mobility LLC</i>, 827 F.3d 1341 (Fed. Cir. 2016) • <i>Enfish, LLC v. Microsoft Corp.</i>, 822 F.3d 1327 (Fed. Cir. 2016) • <i>Yu v. Apple Inc.</i>, 1 F.4th 1040 (Fed. Cir. 2021) • <i>TecSec, Inc. v. Adobe Inc.</i>, 978 F.3d 1278 (Fed. Cir. 2020) • <i>Smart Sys. Innovations, LLC. V. Chi. Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>ChargePoint, Inc. v. Sema-Connect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Cybersource Corp. v. Retail Decisions, Inc.</i>, 654 F.3d 1366 (Fed. Cir. 2011)

¹ In addition to the listed materials, Vertiv reserves the right to rely on: (1) all intrinsic evidence including the ‘287 Patent itself and its prosecution history; (2) extrinsic evidence obtained or disclosed during the course of fact discovery, including inventor testimony; and (3) extrinsic evidence obtained or disclosed during the course of expert discovery including, expert testimony.

² The listing of relevant case law is exemplary. Vertiv reserves the right to rely on additional legal authorities to support their subject matter eligibility positions in this litigation.

Cases relevant to abstract idea inquiry at Alice step one:

- *Move, Inc. v. Real Estate All., Ltd.*, 221 F. Supp. 3d 1149 (C.D. Cal. 2016), affirmed 721 F. App'x 950 (Fed. Cir. 2018)
- *Rothschild Location Techs. LLC v. Geotab USA, Inc.*, 2016 WL 3584195 (E.D. Tex. Jan. 4, 2016), report and rec. adopted, 2016 WL 2847975 (E.D. Tex. May 16, 2016)
- *Peschke Map Techs. LLC v. Rouse Props. Inc.*, 168 F. Supp. 3d 881 (E.D. Va. 2016)
- *Encyc. Britannica, Inc. v. Dickstein Shapiro LLP*, 128 F. Supp. 3d 103 (D.D.C. 2015), aff'd 653 F. App'x 764 (D.C. Cir. 2016)
- *Concaten, Inc. v. Ameritrak Fleet Solutions, LLC*, 131 F. Supp. 3d 1166 (D. Colo. 2015)
- *Location Based Services, LLC v. Google LLC*, C.A. No. 17-83-LPS, 2019 WL 2904670 (D. Del. July 5, 2019)
- *Amdocs (Israel) Ltd. v. Openet Telecom, Inc.*, 841 F.3d 1288 (Fed. Cir. 2016)
- *In re Marco Guldenaar Holding B.V.*, 911 F.3d 1157 (Fed. Cir. 2018)
- *Solutran, Inc. v. Elavon, Inc.*, 931 F.3d 1161 (Fed. Cir. 2019)
- *PersonalWeb Technologies LLC v. Google LLC*, 8 F.4th 1310 (Fed. Cir. 2021)
- *Mortgage Grader, Inc. v. First Choice Loan Services, Inc.*, 811, F.3d 1314 (Fed. Cir. 2016)
- *WhitServe LLC v. Dropbox, Inc.*, 854 F. App'x 367, 372 (Fed. Cir. 2021)

Cases relevant to inventive concept inquiry at Alice step two:

- *Amdocs (Israel) Ltd. v. Opennet Telecom, Inc.*, 841 F.3d 1288 (Fed. Cir. 2016)
- *OIP Techs., Inc. v. Amazon.com, Inc.*, 788 F.3d 1359 (Fed. Cir. 2015)
- *Data Engine Technologies LLC v. Google LLC*, 906 F.3d 999 (Fed. Cir. 2018)
- *RecogniCorp, LLC v. Nintendo Co., Ltd.*, 855 F.3d 1322 (Fed. Cir. 2017)
- *Intellectual Ventures I LLC v. Capital One Bank (NA)*, 792 F.3d 1363 (Fed. Cir. 2015)
- *Elec. Commc'n Techs., LLC v. Shopperschoice.com*, 958 F.3d 1178, 1183 (Fed. Cir. 2020)
- *Affinity Labs of Texas, LLC v. DirecTV, LLC*, 838 F.3d 1253, 1263 (Fed. Cir. 2016)
- *SAP Am., Inc. v. InvestPic, LLC*, 898 F.3d 1161 (Fed. Cir. 2018)
- *Digitech Image Technologies, LLC v. Electronics for Imaging, Inc., et al.*, 758 F.3d 1344 (2014)

	<ul style="list-style-type: none"> • <i>Content Extraction & Transmission LLC v. Wells Fargo Bank, N.A.</i>, 776 F.3d 1343, 1348 (Fed. Cir. 2104) <p><u>Other relevant authority:</u></p> <ul style="list-style-type: none"> • <i>Apple Inc. v. Ameranth, Inc.</i>, 842 F.3d 1229 (Fed. Cir. 2016) • <i>Ultramercial, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014)
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B. Chart Identifying Exception to Eligibility, Representative Claims, Relevant Industry and Time Period, Materials That Support Patent Ineligibility, And Relevant Case Law

Asserted Claims of ‘287 Patent	Section 101 Contentions Regarding Whether Claim Elements Were Well Understood, Routine, and Conventional
<p>1[pre] A method for cooling a room configured to house a plurality of computer systems, said method comprising:</p>	<p>The relevant industry for the ‘287 patent is the cooling systems for buildings industry. As detailed below, each claim element was well-understood, routine, and conventional in that industry as of August 2, 2002.³ In addition, the claim elements in combination were also well-understood, routine, and conventional. Collectively, the claim elements recite nothing more than a combination of components, each of which is generic and well-known in the art. Nothing about the claimed method is anything other than generic, functional, well-understood, routine, or conventional.</p> <p>Vertiv incorporates by reference the prior art identified in the ‘287 patent, the prosecution history of the ‘287 patent, any related litigations, and any related PTAB proceedings. Vertiv further incorporates by</p>

³ Vertiv notes that, under Supreme Court and Federal Circuit precedent, the Court need not, and should not, consider whether each and every element of each Asserted Claim was well understood, routine, and conventional. Rather, the only elements which should be considered under Alice step 2 are the elements that fall outside the scope of the abstract idea. *See Alice Corp. v. CLS Bank Int’l*, 573 U.S. 208, 221–224 (2014); *BSG Tech LLC v. BuySeasons, Inc.*, 899 F.3d 1281, 1290 (Fed. Cir. 2018) (“It has been clear since Alice that a claimed invention’s use of the ineligible concept to which it is directed cannot supply the inventive concept that renders the invention ‘significantly more’ than that ineligible concept.”).

Asserted Claims of ‘287 Patent	Section 101 Contentions Regarding Whether Claim Elements Were Well Understood, Routine, and Conventional
	<p>reference any prior art identified or to be identified in their invalidity contentions and/or expert reports that will be provided according to the schedule provided by the Court’s Docket Control Order, including the state of the art addressed in Section IV of Vertiv’s invalidity contentions and citations for the preamble found in claim charts B-1, <i>et seq.</i></p> <p>To the extent the preamble is limiting, methods for cooling a room configured to house computer systems were well understood, routine, and conventional in the relevant industry at the relevant time period.</p> <p>For example, the intrinsic record, including the specification of the ‘287 patent, establishes that the preamble was well understood, routine, and conventional. <i>See, e.g.</i>, ‘287 patent at 1:63–2:29 (describing conventional systems and methods of controlling atmospheric conditions within a data center using one or more air conditioning units).</p>
<p>1[a] providing a plurality of heat exchanger units configured to receive air from said room and to deliver air to said room;</p>	<p>Methods of cooling a room configured to house computer systems comprising providing a plurality of heat exchanger units configured to receive air from said room and to deliver air to said room were well understood, routine, and conventional in the relevant industry at the relevant time period.</p> <p>For example, the intrinsic record, including the specification of the ‘287 patent, establishes that this claim element was well understood, routine, and conventional. <i>See, e.g.</i>, ‘287 patent at 3:34–40 (describing cooling system including heat exchanger unit (“HEU”) receiving cooling fluid and operable to deliver cooled air to one or more computer systems without specifying any special feature or improvement thereto, indicating that the claimed feature is generic, well-known, and conventional). <i>See, e.g.</i>, ‘287 patent at 4:46–63 (confirming that HEUs operable to receive air and to deliver the received air to the room are conventional components and referencing the HEUs of a DATACOOOL environmental control system commercially available from Liebert).</p> <p>Vertiv further incorporates by reference the state of the art addressed in Section IV of Vertiv’s invalidity contentions and citations for this claim element found in claim charts B-1, <i>et seq.</i></p>

Asserted Claims of ‘287 Patent	Section 101 Contentions Regarding Whether Claim Elements Were Well Understood, Routine, and Conventional
<p>1[b] supplying said plurality of heat exchanger units with cooling fluid from an air conditioning unit;</p>	<p>Methods of cooling a room configured to house computer systems comprising supplying said plurality of heat exchanger units with cooling fluid from an air conditioning unit were well understood, routine, and conventional in the relevant industry at the relevant time period.</p> <p>For example, the intrinsic record, including the specification of the ‘287 patent, establishes that this claim element was well understood, routine, and conventional. <i>See, e.g.</i>, ‘287 patent at 4:46–63 (confirming that HEUs operable to receive air and to deliver the received air to the room are conventional components and referencing the HEUs of a DATACOOOL environmental control system commercially available from Liebert). <i>See, e.g.</i>, ‘287 patent at 3:34–40 (describing the HEUs as configured to receive cooling fluid and designed to absorb heat from air into the cooling fluid).</p> <p>Vertiv further incorporates by reference the state of the art addressed in Section IV of Vertiv’s invalidity contentions and citations for this claim element found in claim charts B-1, <i>et seq.</i></p>
<p>1[c] cooling said received air through heat exchange with the cooling fluid in the plurality of heat exchanger units;</p>	<p>Methods of cooling a room configured to house computer systems comprising cooling said received air through heat exchange with the cooling fluid in the plurality of heat exchanger units were well understood, routine, and conventional in the relevant industry at the relevant time period.</p> <p>For example, the intrinsic record, including the specification of the ‘287 patent, establishes that this claim element was well understood, routine, and conventional. <i>See, e.g.</i>, ‘287 patent at 4:46–63 (confirming that HEUs operable to receive air and to deliver the received air to the room are conventional components and referencing the HEUs of a DATACOOOL environmental control system commercially available from Liebert). <i>See, e.g.</i>, ‘287 patent at 3:34–40 (describing the HEUs as configured to receive cooling fluid and designed to absorb heat from air into the cooling fluid).</p> <p>Vertiv further incorporates by reference the state of the art addressed in Section IV of Vertiv’s invalidity contentions and citations for this claim element found in claim charts B-1, <i>et seq.</i></p>
<p>1[d] sensing temperatures at one or more locations in said room;</p>	<p>Methods of cooling a room configured to house computer systems comprising sensing temperatures at one or more locations in said room were well understood, routine, and conventional in the relevant industry at the relevant time period.</p>

Asserted Claims of ‘287 Patent	Section 101 Contentions Regarding Whether Claim Elements Were Well Understood, Routine, and Conventional
	<p>For example, the intrinsic record, including the specification of the ‘287 patent, establishes that this claim element was well understood, routine, and conventional. <i>See, e.g.</i>, ‘287 patent at 6:63–7:9 (describing the use of conventional temperature sensors, such as thermocouples, to sense temperatures at various locations within a room without specifying any special feature or improvement thereto, indicating that the claimed feature is generic, well-known, and conventional). <i>See, e.g.</i>, ‘287 patent at 10:39–62 (describing the use of conventional thermocouples to sense temperature and indicating that locating temperature sensors at various positions throughout a room was understood by those skilled in the art).</p> <p>Vertiv further incorporates by reference the state of the art addressed in Section IV of Vertiv’s invalidity contentions and citations for this claim element found in claim charts B-1, <i>et seq.</i></p>
<p>1[e] controlling at least one of the temperature of said cooling fluid and said air delivery by said plurality of heat exchanger units to said room in response to said sensed temperatures at said one or more locations; and</p>	<p>Methods of cooling a room configured to house computer systems comprising controlling at least one of the temperature of said cooling fluid and said air delivery by said plurality of heat exchanger units to said room in response to said sensed temperatures at said one or more locations were well understood, routine, and conventional in the relevant industry at the relevant time period.</p> <p>For example, the intrinsic record, including the specification of the ‘287 patent, establishes that this claim element was well understood, routine, and conventional. <i>See, e.g.</i>, ‘287 patent at 1:52–2:29 (describing the conventional practice of controlling the flow of conditioned air based on the cooling needs of a data center). <i>See, e.g.</i>, ‘287 patent at 3:34–48 (describing known cooling devices operable to cool the cooling fluid). <i>See, e.g.</i>, ‘287 patent at 3:49–57 (describing use of conventional controller for controlling temperature of the cooling fluid and/or the output of the HEU). <i>See, e.g.</i>, ‘287 patent at 5:28–40 (describing cooling device implementing known cooling technologies suitable to cool and control temperature of cooling fluid). <i>See, e.g.</i>, ‘287 patent at 8:8–59 (describing conventional programmable controllers for controlling operation of fans, pumps and valves and manipulating temperature of cooling fluid). <i>See, e.g.</i>, ‘287 patent at 9:37–57 (describing conventional programmable controller for controlling air flow characteristics and/or cooling fluid temperature to operate cooling system at optimized levels without specifying any special feature or improvement thereto, indicating that the claimed feature is generic, well-known, and conventional).</p>

Asserted Claims of ‘287 Patent	Section 101 Contentions Regarding Whether Claim Elements Were Well Understood, Routine, and Conventional
	Vertiv further incorporates by reference the state of the art addressed in Section IV of Vertiv’s invalidity contentions and citations for this claim element found in claim charts B-1, <i>et seq.</i>
<p>1[f] wherein the step of controlling said air delivery by said plurality of heat exchanger units comprises individually manipulating a mass flow rate of the cooling fluid supplied to each of the plurality of heat exchanger units.</p>	<p>Methods of cooling a room configured to house computer systems comprising individually manipulating a mass flow rate of the cooling fluid supplied to each of the plurality of heat exchanger units were well understood, routine, and conventional in the relevant industry at the relevant time period.</p> <p>For example, the intrinsic record, including the specification of the ‘287 patent, establishes that this claim element was well understood, routine, and conventional. <i>See, e.g.</i>, ‘287 patent at 8:8–59 (describing conventional programmable controllers for controlling operation of fans, pumps and valves and manipulating temperature of cooling fluid). <i>See, e.g.</i>, ‘287 patent at 6:16–25 (describing use of conventional programmable controller for manipulating cooling fluid flow valves to adjust flow of cooling fluid supplied to HEUs). <i>See, e.g.</i>, ‘287 patent at 11:34–42 (describing use of conventional programmable controller for adjusting flow of cooling fluid through HEUs by operation of pump and/or flow regulating valves).</p> <p>Vertiv further incorporates by reference the state of the art addressed in Section IV of Vertiv’s invalidity contentions and citations for this claim element found in claim charts B-1, <i>et seq.</i></p>
<p>[2] The method according to claim 1, wherein said step of controlling at least one of a temperature of said cooling fluid and said air delivery to said room comprises varying an output of said air conditioning unit to control the temperature of said cooling fluid.</p>	<p>Methods of cooling a room configured to house computer systems comprising varying an output of said air conditioning unit to control the temperature of said cooling fluid were well understood, routine, and conventional in the relevant industry at the relevant time period.</p> <p>For example, the intrinsic record, including the specification of the ‘287 patent, establishes that this claim element was well understood, routine, and conventional. <i>See, e.g.</i>, ‘287 patent at 1:52–2:29 (describing the conventional practice of controlling the flow of conditioned air based on the cooling needs of a data center). <i>See, e.g.</i>, ‘287 patent at 8:8–59 (describing conventional programmable controllers for controlling operation of fans, pumps and valves and manipulating temperature of cooling fluid).</p>

Asserted Claims of ‘287 Patent	Section 101 Contentions Regarding Whether Claim Elements Were Well Understood, Routine, and Conventional
	Vertiv further incorporates by reference the state of the art addressed in Section IV of Vertiv’s invalidity contentions and citations for this claim element found in claim charts B-1, <i>et seq.</i>
<p>[3] The method according to claim 1, further comprising: determining whether the sensed temperatures at one or more locations in said room are within a predetermined range.</p>	<p>Methods of cooling a room configured to house computer systems comprising determining whether the sensed temperatures at one or more locations in said room are within a predetermined range were well understood, routine, and conventional in the relevant industry at the relevant time period.</p> <p>For example, the intrinsic record, including the specification of the ‘287 patent, establishes that this claim element was well understood, routine, and conventional. <i>See, e.g.</i>, ‘287 patent at 9:37–57 (describing conventional programmable controllers for determining whether sensed rack temperatures are within a predetermined range).</p> <p>Vertiv further incorporates by reference the state of the art addressed in Section IV of Vertiv’s invalidity contentions and citations for this claim element found in claim charts B-1, <i>et seq.</i></p>
<p>[4] The method according to claim 3, further comprising: varying the cooling fluid temperature in response to the sensed temperatures at one or more locations in said room being outside of said predetermined range.</p>	<p>Methods of cooling a room configured to house computer systems comprising varying the cooling fluid temperature in response to the sensed temperatures at one or more locations in said room being outside of said predetermined range were well understood, routine, and conventional in the relevant industry at the relevant time period.</p> <p><i>See</i> disclosures for claim element 1[e].</p>
<p>[5] The method according to claim 4, further comprising: increasing said cooling fluid temperature in</p>	<p>Methods of cooling a room configured to house computer systems comprising increasing said cooling fluid temperature in response to a sum of the sensed temperatures at one or more locations being below</p>

Asserted Claims of '287 Patent	Section 101 Contentions Regarding Whether Claim Elements Were Well Understood, Routine, and Conventional
<p>response to a sum of the sensed temperatures at one or more locations being below said predetermined range.</p>	<p>said predetermined range were well understood, routine, and conventional in the relevant industry at the relevant time period.</p> <p><i>See disclosures for claim element 1[e].</i></p>
<p>[6] The method according to claim 4, further comprising: decreasing said cooling fluid temperature in response to a sum of the sensed temperatures at one or more locations being above said predetermined range.</p>	<p>Methods of cooling a room configured to house computer systems comprising decreasing said cooling fluid temperature in response to a sum of the sensed temperatures at one or more locations being above said predetermined range were well understood, routine, and conventional in the relevant industry at the relevant time period.</p> <p><i>See disclosures for claim element 1[e].</i></p>
<p>[7] The method according to claim 1, wherein the step of manipulating a mass flow rate of the cooling fluid supplied to each of the plurality of heat exchanger units further comprises metering the flow of cooling fluid through each of said plurality of heat exchanger units with a plurality of valves positioned along respective cooling fluid lines configured to channel cooling fluid from the air conditioning unit to the plurality of heat exchanger units.</p>	<p>Methods of cooling a room configured to house computer systems comprising metering the flow of cooling fluid through each of said plurality of heat exchanger units with a plurality of valves positioned along respective cooling fluid lines configured to channel cooling fluid from the air conditioning unit to the plurality of heat exchanger units were well understood, routine, and conventional in the relevant industry at the relevant time period.</p> <p><i>See disclosures for claim elements 1[e] and 1[f].</i></p>

Asserted Claims of '287 Patent	Section 101 Contentions Regarding Whether Claim Elements Were Well Understood, Routine, and Conventional
<p>[8] The method according to claim 1, wherein the step of manipulating a mass flow rate of the cooling fluid supplied to each of the plurality of heat exchanger units further comprises metering the flow of cooling fluid through said plurality of heat exchanger units with a plurality of pumps positioned along respective cooling fluid lines configured to channel cooling fluid from the air conditioning unit to the plurality of heat exchanger units.</p>	<p>Methods of cooling a room configured to house computer systems comprising metering the flow of cooling fluid through said plurality of heat exchanger units with a plurality of pumps positioned along respective cooling fluid lines configured to channel cooling fluid from the air conditioning unit to the plurality of heat exchanger units were well understood, routine, and conventional in the relevant industry at the relevant time period.</p> <p><i>See disclosures for claim elements 1[e] and 1[f].</i></p>
<p>[9] The method according to claim 1, further comprising: manipulating a mass flow rate of the cooling fluid supplied to the plurality of heat exchanger units in substantially independent manners with respect to each of the plurality of heat exchanger units.</p>	<p>Methods of cooling a room configured to house computer systems comprising manipulating a mass flow rate of the cooling fluid supplied to the plurality of heat exchanger units in substantially independent manners with respect to each of the plurality of heat exchanger units were well understood, routine, and conventional in the relevant industry at the relevant time period.</p> <p><i>See disclosures for claim elements 1[e] and 1[f].</i></p>