



HFT v. Champion

From Eric Huang <erichuang@quinnemanuel.com>

Date Thu 8/14/2025 9:46 PM

To Tim Ziolkowski <tjz@zpatents.com>; Jacob Fritz <jmf@zpatents.com>

Cc HB - Champion <hb-champion@huschblackwell.com>; QE-HarborFreight-Champion <qe-harborfreight-champion@quinnemanuel.com>

Counsel,

Following up on our meet and confer regarding claim construction and in an effort to narrow the disputes for the Court, Harbor Freight proposes to present the following claim terms to the Court for construction/decision. Furthermore, in the interests of assisting the Court with review of the briefs, we propose that the parties agree to present the disputed terms grouped and in this order in the briefing. Please let us know if Champion agrees. We are available to confer further regarding the terms.

- "selector switch" (101/667/390/896)
- "valve assembly" (101/667/390/896)
- "a mechanical fuel valve" (780/654/985/970/895)
- "fuel lockout apparatus" (780/654/895)
- "from coupling"/ "coupling"/ "to couple" (780/654/895)
- "communicate"/ "communication" (780/895)
- "switch . . . to [enable changing / change] operation of the engine between gaseous fuel and liquid fuel" (398/145/034)
- "rotating mechanical valve" (145)
- "pressure regulator" (034/654/985/120/970)
- "integral components of" (985)
- "disconnected from the dual fuel generator" (970)
- "gaseous cutoff" (034)
- "coupled to [verb]" (034)

With respect to Jennifer's email tonight, the Court didn't enter the parties proposed schedule. As I mentioned in the last meet and confer on claim construction with Mr. Ziolkowski, we think it may make sense to file a joint submission closer to the time we file the opening briefs. The reduction of claim terms above should help smooth the presentation of claim terms to the Court. We can discuss tomorrow.

Thank you.

Eric