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18 UNITED STATES DISTRICT COURT
19 DISTRICT OF ARIZONA

20 Champion Power Equipment, Inc.,

Plaintiff,

v.

21 Firman Power Equipment Inc.,

22 Defendant.

Case No. 2:23-cv-02371-DWL

**JOINT CLAIM CONSTRUCTION
STATEMENT AND
IDENTIFICATION OF INTRINSIC
AND EXTRINSIC EVIDENCE**

23
24 Pursuant to the Case Management Order (Doc. 33) and the Order approving the
25 Stipulation and Joint Motion to Amend the Case Management Order (Doc. 105), Firman
26 Power Equipment Inc (“Firman”) and Champion Power Equipment, Inc. (“Champion”)
27 present the following Joint Claim Construction Statement as follows.
28

I. AGREED CONSTRUCTIONS

Pursuant to Paragraph 5(F)(1) of the Case Management Order (Doc. 33) the parties identify the following constructions of claim terms, phrases, or clauses on which the parties agree:

Claim Term	Proposed Agreed Construction	Asserted Patent [and Claims]
located off board	not mounted to	11,530,654 [1, 6, 10] 11,492,985 [1, 11, 16] 11,840,970 [1, 12, 20] 11,905,895 [14] 10,393,034 [24]
service valve	a valve that permits fuel flow from a pressurized fuel source	11,530,654 [1, 6] 11,492,985 [16] 11,840,970 [1, 14, 20] 11,905,895 [14] 10,393,034 [11, 24] 11,143,120 [12]
pressure regulator	a device that controls pressure	11,492,985 [1] 11,530,654 [10] 11,840,970 [12]
primary pressure regulator	a first pressure regulator	11,530,654 [1, 6] 11,492,985 [7, 16] 11,840,970 [1, 14, 20, 23] 11,905,895 [14] 10,393,034 [11, 24] 11,143,120 [12]
secondary pressure regulator	a second pressure regulator	11,530,654 [1-2, 6] 11,492,985 [7, 16, 18] 11,840,970 [1, 7, 14-15, 20, 29] 11,905,895 [14] 10,393,034 [11, 24] 11,143,120 [12]

II. PROPOSED CONSTRUCTIONS FOR DISPUTED CLAIM TERMS

Pursuant to Paragraph 5(F)(2) of the Case Management Order (Doc. 33), the parties have attached a chart hereto as Exhibit 1, which identify each party's proposed claim construction or indefiniteness position for each disputed claim term, phrase, or clause, together with an identification of all references from the specification or

1 prosecution history that support that construction, and an identification of any extrinsic
 2 evidence on which each party intends to rely either to support its proposed construction
 3 or to oppose any other party’s proposed construction, including, but not limited to, as
 4 permitted by law, dictionary definitions, citations to learned treatises and prior art, and
 5 testimony of percipient and expert witnesses.

6 **III. IDENTIFICATION OF THE TERMS WHOSE CONSTRUCTION WILL BE**
 7 **MOST SIGNIFICANT AND ANY THAT ARE CLAIM OR CASE DISPOSITIVE**

8 Pursuant to Paragraph 5(F)(3) of the Case Management Order (Doc. 33), the
 9 parties identify the following constructions of claim terms, phrases, or clauses whose
 10 construction will be most significant to the resolution of the case up to a maximum of 10
 11 and any term among the 10 whose construction will be case or claim dispositive:

Claim Term	Identified by	Dispositive ¹
coupled to	Both Parties	Yes
fuel lockout apparatus	Both Parties	Yes
fuel valve	Champion	Yes
electro-mechanical valve system	Champion	Yes
simultaneously	Champion	Yes
desired pressure	Champion	Yes
selector switch	Firman	Yes
valve assembly	Firman	Yes
prevent[s] actuation of the mechanical fuel valve prevent the mechanical fuel valve from opening the liquid fuel line	Firman	Yes
prevent[s] the ... fuel source from coupling ... and ... permit[s] the ... fuel source to couple	Firman	Yes

24 **IV. ANTICIPATED LENGTH OF TIME NECESSARY FOR HEARING**

25 Pursuant to Paragraph 5(F)(4) of the Case Management Order (Doc. 33), the
 26 parties identify the anticipated length of time necessary for the Claim Construction

27 _____
 28 ¹ By indicating “Yes,” the Parties believe that the Court’s construction may be dispositive with regard to the claims in which these terms appear.

Hearing, including a technical tutorial followed by oral arguments for all disputed terms, will be approximately six (6) Hours. Two weeks after the close of briefing, the parties will provide the Court a proposed structure for the hearing that details the term-by-term sequence in which the parties will address the merits, identify the party that will present first for each term, whether the parties propose using live testimony (see § V *infra*) addressing the merits of the terms, and a proposal for the technical tutorial.

V. ANTICIPATED WITNESS TO BE PRESENT AT THE HEARING

Pursuant to Paragraph 5(F)(5) of the Case Management Order (Doc. 33), the parties identify the following expert witnesses at the Claim Construction Hearing:

1. William Singhose, Ph.D.
2. Timothy Jacobs, Ph.D.

The Parties do not anticipate calling any non-expert witnesses at the Claim Construction Hearing.

VI. IDENTIFICATION OF FACTUAL FINDINGS REQUESTED

Pursuant to Paragraph 5(F)(6) of the Case Management Order (Doc. 33), the parties do not request any factual findings from the court related to claim construction.

DATED this 7th day of March, 2025.

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Equipment, Inc.*

EXHIBIT 1

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
selector switch	10,598,101 [17–18] 11,306,667 [1, 2, 7–8, 10–12, 14, 18] 11,761,390 [1–4, 6] 11,905,896 [21–23, 25, 27, 30–31, 37]	plain and ordinary meaning	'101 patent col. 5 ln. 22; col. 6 ln. 62, FIGS. 4–6 (and corresponding locations in the '390, '667, and '896 patents). Dr. Singhose is expected to testify that a person having ordinary skill in the art would accord this term its plain and ordinary meaning consistent with and understood in light of the	a movable barrier whose positioning enables access for a subsequent user selection of only one fuel source ³	The '101 Patent ⁴ at Abstract; 1:13-16, 1:51-57, 2:3-11, 2:25-33, 2:52-58, 4:4-30, 5:12-7:17, 7:26-8:8; Fig. Nos. 1-6; ⁵ The '273, '101, '667, '390, and '896 Patents' claims U.S. Patent Nos. 4,489,699 ("Poehlman");

¹ For each claim term, Champion also identifies the information disclosed in Champion's expert report and any supplements thereto. Firman objects that this does not comply with the Case Management Order.

³ Champion objects to Firman's construction of "selector switch." On Wednesday, March 5, 2025, at 2:40PM MT, Firman again amended its proposed construction. Firman's previous proposed construction was: "a component whose positioning enables a subsequent user selection." Champion requested that Firman withdraw its new construction, which Firman declined. Champion's expert indicated he did not have time to address Firman's new change by the expert disclosure deadline of March 7, 2025. Champion's expert report addresses Firman's previous construction. Champion reserves the right to supplement its expert report to address Firman's new construction. Firman objects that this does not comply with the Case Management Order.

⁴ The specification, including the Abstract, Figures, Background, and Descriptions, are identical for the '273 Patent, '101 Patent, '667 Patent, '390 Patent, and '896 Patent. Therefore, Firman incorporates by reference all parallel portions of the '273, '101, '667, '390, and '896 Patents' specification as if expressly cited herein.

⁵ Firman's Citations to patent figures includes the figure it expressly identifies by number, as well as all textual discussions of that figure within the relevant patent's written description.

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
			<p>specification and claim language.</p> <p>Dr. Singhose is also expected to respond to any proposed construction of the term other than in accord with its plain and ordinary meaning.</p> <p>Champion may also use any materials referenced by Firman.²</p>		<p>3,696,333 (“Mott”); 4,297,742 (“Heitzman”);</p> <p>U.S. Patent Pub. Nos. 2006/0169238 (“Mazuka”), 2004/0240141 (“Stolt”), 2007/0137591 (“Sugimoto”), 2002/0125115 (“Burkholder”); 2004/0246118 (“Tharman”);</p> <p>The '273 Patent's Prosecution: Application (Nov. 1, 2013) at 14-19 (claims); Preliminary Amendment (May 18, 2015) at 2-9 (claims and remarks); Non-Final Rejection (July 7, 2015) at 2-6 (detailed action); Amendment/Response</p>

² Firman objects that this does not comply with the Case Management Order. Firman's objection applies to all instances of this statement, but Firman does not repeat this footnote.

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					<p>(Oct. 7, 2015) at 2-7 (amended claims), 8-12 (remarks); Final Rejection (Dec. 31, 2015) at 2-9 (detailed action); Amendment/Response (Feb. 29, 2016) at 8-14 (remarks); Advisory Action (Mar. 24, 2016) at 2 (continuation sheet); Supplemental Amendment/Response (Mar. 31, 2016) at 2-7 (claims); 8-9 (remarks); Notice of Allowability (May 9, 2016) at 2-5 (detailed action)</p> <p>The '101 Patent's Prosecution: Application (Feb. 4, 2016) at 14-17; Preliminary Amendment (July 22, 2016) at 6-7 (claims); Non-Final Rejection (Jan. 5, 2018) at 2-10 (detailed action);</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>Response (Apr. 5, 2018) at 6-16 (remarks); Final Rejection (Aug. 9, 2018) at 2-13 (detailed action); Appeal Brief (Mar. 8, 2019) at 1-21 (arguments); Non-Final Rejection (June 25, 2019) at 2-10 (detailed action); Interview Summary (Oct. 1, 2019) at 1; Amendment/Response (Oct. 25, 2019) at 2-6 (claims), 7-13 (remarks); Terminal Disclaimer (Dec. 16, 2019) at 1; Interview Summary (Dec. 27, 2019) at 1; Notice of allowability (Dec. 27, 2019) at 2-4 (examiner amendments);</p> <p>The '667 Patent's Prosecution: Application (Feb. 13, 2020) at 14-17 (claims); Non-Final Rejection (Mar. 11,</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>2021) at 2-11 (detailed action); Amendment/Response (June 11, 2021) at 5-12; Non-Final Rejection (June 24, 2021) at 2-6; Amendment/Response (Sep. 24, 2021) at 2-4 (claims), 5-8 (remarks); Terminal Disclaimer (Sep. 24, 2021) at 1; Final Rejection (Dec. 17, 2021) at 2-5; Interview Summary (Feb. 15, 2022) at 1; Notice of Allowability (Feb. 15, 2022) at 2-4 (examiner's amendment);</p> <p>The '390 Patent's Prosecution: Application (Feb. 16, 2022) at 14-17 (claims); Non-Final Rejection (Sep. 15, 2022) at 2-9 (detailed action); Amendment/Response (Dec. 15, 2022) at 4-7</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion’s Proposed Construction	Champion’s Support¹	Firman’s Proposed Construction	Firman’s Support
					<p>(claims), 8-13 (remarks); Terminal disclaimer (Dec. 15, 2022) at 1; Non-Final Rejection (Apr. 6, 2023) at 2-5 (detailed action); Amendment/Response (July 6, 2023) at 2-5 (claims), 6-10; Notice of Allowability (Aug. 3, 2023) at 2-3 (detailed action); Comments on Reasons for Allowance (Aug. 14, 2023) at 1-2;</p> <p>The '896 Patent’s Prosecution: Application (June 7, 2023) at 14-22 (claims); Terminal Disclaimer (Dec. 1, 2023) at 1-2; Notice of Allowability (Dec. 15, 2023) at 2-4 (detailed action);</p> <p>Plaintiff’s Infringement Contentions for the '101,</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>'667, '390, and '896 Patents;</p> <p>Plaintiff's Claim Charts for the '101,⁶ '667,⁷ and '896⁸ Patents for Champion Products;</p> <p>Plaintiff's Licensing Efforts;⁹</p> <p>Dr. Jacobs may provide testimony explaining that a person of ordinary skill in the art would not have understood this term to have a meaning as a term of art;</p> <p>Dr. Jacobs may also provide testimony explaining how a person of ordinary skill in the art would interpret portions</p>

⁶ CPN010315, CPN010319, CPN010323, CPN010327, CPN010331, CPN010335, CPN010339, CPN010343, CPN010347, CPN010351, CPN010355, CPN010360, CPN010365, CPN010370, CPN010375, CPN010380, CPN010385, CPN010390, CPN010395, CPN010400, CPN010405, CPN010410, CPN010415, CPN010420, CPN010425, CPN010429, CPN010434, CPN010438, CPN010442, CPN010446, CPN010453, CPN010456, CPN010642, CPN010648, CPN010650, CPN010669,

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					of the specification(s) relevant to this term;
valve assembly	10,598,101 [17–18] 11,306,667 [1–3, 10, 12–15] 11,761,390 [3–7] 11,905,896 [21, 25–28, 30–32]	plain and ordinary meaning	'101 patent col. 4 ln. 17:45, FIGS. 2:3 (and corresponding locations in the '390, '667, and '896 patents). '101 patent wrapper at CPN000853:56. Dr. Singhose is expected to testify that a person having ordinary skill in the art would accord this term its plain and ordinary meaning consistent with and understood in light of the specification and claim language. Dr. Singhose is also expected to respond to any proposed construction	an assembly including a fuel valve and handle that are separate and distinct from the selector switch	The '101 Patent ¹⁰ at Abstract; 1:41-57, 1:61-58, 4:4-5:21, 5:35-6:41, 6:66-7:49, 7:54-8:8; Fig. Nos. 1-3, 5-6; ¹¹ The '273, '101, '667, '390, and '896 Patents' claims; U.S. Patent Nos. 4,489,699 ("Poehlman"); 3,696,333 ("Mott"); 4,297,742 ("Heitzman"); U.S. Patent Pub. Nos. 2006/0169238 ("Mazuka"),

¹⁰ The specification, including the Abstract, Figures, Background, and Descriptions, are identical for the '273 Patent, '101 Patent, '667 Patent, '390 Patent, and '896 Patent. Therefore, Firman incorporates by reference all parallel portions of the '273, '101, '667, '390, and '896 Patents' specification as if expressly cited herein.

¹¹ Firman's Citations to patent figures includes the figure it expressly identifies by number, as well as all textual discussions of that figure within the relevant patent's written description.

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
			<p>of the term other than in accord with its plain and ordinary meaning.</p> <p>Champion may also use any materials referenced by Firman.</p>		<p>2004/0240141 (“Stolt”), 2007/0137591 (“Sugimoto”), 2002/0125115 (“Burkholder”); 2004/0246118 (“Tharman”);</p> <p>The '273 Patent's Prosecution: Application (Nov. 1, 2013) at 14-19 (claims); Preliminary Amendment (May 18, 2015) at 2-9 (claims and remarks); Non-Final Rejection (July 7, 2015) at 2-6 (detailed action); Amendment/Response (Oct. 7, 2015) at 2-7 (amended claims), 8-12 (remarks); Final Rejection (Dec. 31, 2015) at 2-9 (detailed action); Amendment/Response (Feb. 29, 2016) at 8-14 (remarks); Advisory</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					<p>Action (Mar. 24, 2016) at 2 (continuation sheet); Supplemental Amendment/Response (Mar. 31, 2016) at 2-7 (claims); 8-9 (remarks); Notice of Allowability (May 9, 2016) at 2-5 (detailed action)</p> <p>The '101 Patent's Prosecution: Application (Feb. 4, 2016) at 14-17; Preliminary Amendment (July 22, 2016) at 6-7 (claims); Non-Final Rejection (Jan. 5, 2018) at 2-10 (detailed action); Response (Apr. 5, 2018) at 6-16 (remarks); Final Rejection (Aug. 9, 2018) at 2-13 (detailed action); Appeal Brief (Mar. 8, 2019) at 1-21 (arguments); Non-Final Rejection (June 25, 2019) at 2-10 (detailed action);</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					<p>Interview Summary (Oct. 1, 2019) at 1; Amendment/Response (Oct. 25, 2019) at 2-6 (claims), 7-13 (remarks); Terminal Disclaimer (Dec. 16, 2019) at 1; Interview Summary (Dec. 27, 2019) at 1; Notice of allowability (Dec. 27, 2019) at 2-4 (examiner amendments);</p> <p>The '667 Patent's Prosecution: Application (Feb. 13, 2020) at 14-17 (claims); Non-Final Rejection (Mar. 11, 2021) at 2-11 (detailed action); Amendment/Response (June 11, 2021) at 5-12; Non-Final Rejection (June 24, 2021) at 2-6; Amendment/Response (Sep. 24, 2021) at 2-4 (claims), 5-8 (remarks);</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>Terminal Disclaimer (Sep. 24, 2021) at 1; Final Rejection (Dec. 17, 2021) at 2-5; Interview Summary (Feb. 15, 2022) at 1; Notice of Allowability (Feb. 15, 2022) at 2-4 (examiner's amendment);</p> <p>The '390 Patent's Prosecution: Application (Feb. 16, 2022) at 14-17 (claims); Non-Final Rejection (Sep. 15, 2022) at 2-9 (detailed action); Amendment/Response (Dec. 15, 2022) at 4-7 (claims), 8-13 (remarks); Terminal disclaimer (Dec. 15, 2022) at 1; Non-Final Rejection (Apr. 6, 2023) at 2-5 (detailed action); Amendment/Response (July 6, 2023) at 2-5 (claims), 6-10; Notice of</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					<p>Allowability (Aug. 3, 2023) at 2-3 (detailed action); Comments on Reasons for Allowance (Aug. 14, 2023) at 1-2;</p> <p>The '896 Patent's Prosecution: Application (June 7, 2023) at 14-22 (claims); Terminal Disclaimer (Dec. 1, 2023) at 1-2; Notice of Allowability (Dec. 15, 2023) at 2-4 (detailed action);</p> <p>Plaintiff's Infringement Contentions for the '101, '667, '390, and '896 Patents;</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					Plaintiff's Claim Charts for the '101, ¹² '667, ¹³ and '896 ¹⁴ Patents for Champion Products; Plaintiff's Licensing Efforts; ¹⁵ Philip L. Skousen, Valve Handbook (McGraw-Hill eds., 3rd ed. 2011): Chapters 1, 3, 4, 5
fuel valve	10,598,101 [18]	plain and ordinary meaning	'034 Patent col. 6 ln. 9:15, 27:33, col. 9 ln. 27:42, col. 9 ln. 67:col.	a mechanical fuel valve	The '101 Patent ¹⁶ at Abstract; 1:41-57, 1:61-58, 2:12-33, 2:42-48,

¹² CPN010315, CPN010319, CPN010323, CPN010327, CPN010331, CPN010335, CPN010339, CPN010343, CPN010347, CPN010351,

¹³ CPN010355, CPN010360, CPN010365, CPN010370, CPN010375, CPN010380, CPN010385, CPN010390, CPN010395, CPN010400,

¹⁴ CPN010405, CPN010410, CPN010415, CPN010420, CPN010425, CPN010429, CPN010434, CPN010438, CPN010442, CPN010446,

¹⁵ CPN010453, CPN010456, CPN010642, CPN010648, CPN010650, CPN010669,

¹⁶ The specification, including the Abstract, Figures, Background, and Descriptions, are identical for the '273 Patent, '101 Patent, '667 Patent, '390 Patent, and '896 Patent. Therefore, Firman incorporates by reference all parallel portions of the '273, '101, '667, '390, and '896 Patents' specification as if expressly cited herein.

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Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
	11,306,667 [3, 15] 11,761,390 [7] 11,905,896 [28, 32] 11,306,667 [1] 11,905,896 [30] 11,761,390 [4] 11,905,896 [25]		10 ln. 1, FIGS. 1–3 (and corresponding locations in the '120 Patent); '101 Patent col. 1 ln. 32:57, col. 4 ln. 34:45, col. 6 ln. 54:57, FIGS. 2–3 (and corresponding locations in the '390 Patent, '667 Patent, and '896 Patent); '398 Patent col. 7 ln. 19:21, FIGS. 3–4B (and corresponding locations in the '145 Patent); '780 Patent col. 6 ln. 2:6, FIGS. 2–4B (and corresponding locations in the '654 Patent, '895 Patent, '970 Patent, and '985 Patent). Dr. Singhose is expected to testify that a person having ordinary skill in the art would accord this term its plain and ordinary meaning consistent with and understood in		2:51-58, 4:4-5:21, 5:35-6:41, 6:66-7:49, 7:54-8:8; claims 1-19; Fig. Nos. 1-3, 5-6; ¹⁷ The '273, '101, '667, '390, and '896 Patents' claims; U.S. Patent Nos. 4,489,699 ("Poehlman"); 3,696,333 ("Mott"); 4,297,742 ("Heitzman"); U.S. Patent Pub. Nos. 2006/0169238 ("Mazuka"), 2004/0240141 ("Stolt"), 2007/0137591 ("Sugimoto"), 2002/0125115 ("Burkholder"); 2004/0246118 ("Tharman");

¹⁷ Firman's Citations to patent figures includes the figure it expressly identifies by number, as well as all textual discussions of that figure within the relevant patent's written description.

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
			<p>light of the specification and claim language.</p> <p>Dr. Singhose is also expected to respond to any proposed construction of the term other than in accord with its plain and ordinary meaning.</p> <p>Champion may also use any materials referenced by Firman.</p>		<p>The '273 Patent's Prosecution: Application (Nov. 1, 2013) at 14-19 (claims); Preliminary Amendment (May 18, 2015) at 2-9 (claims and remarks); Non-Final Rejection (July 7, 2015) at 2-6 (detailed action); Amendment/Response (Oct. 7, 2015) at 2-7 (amended claims), 8-12 (remarks); Final Rejection (Dec. 31, 2015) at 2-9 (detailed action); Amendment/Response (Feb. 29, 2016) at 8-14 (remarks); Advisory Action (Mar. 24, 2016) at 2 (continuation sheet); Supplemental Amendment/Response (Mar. 31, 2016) at 2-7 (claims); 8-9 (remarks); Notice of Allowability</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					<p>(May 9, 2016) at 2-5 (detailed action)</p> <p>The '101 Patent's Prosecution: Application (Feb. 4, 2016) at 14-17; Preliminary Amendment (July 22, 2016) at 6-7 (claims); Non-Final Rejection (Jan. 5, 2018) at 2-10 (detailed action); Response (Apr. 5, 2018) at 6-16 (remarks); Final Rejection (Aug. 9, 2018) at 2-13 (detailed action); Appeal Brief (Mar. 8, 2019) at 1-21 (arguments); Non-Final Rejection (June 25, 2019) at 2-10 (detailed action); Interview Summary (Oct. 1, 2019) at 1; Amendment/Response (Oct. 25, 2019) at 2-6 (claims), 7-13 (remarks); Terminal Disclaimer (Dec. 16, 2019) at 1;</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					<p>Interview Summary (Dec. 27, 2019) at 1; Notice of allowability (Dec. 27, 2019) at 2-4 (examiner amendments);</p> <p>The '667 Patent's Prosecution: Application (Feb. 13, 2020) at 14-17 (claims); Non-Final Rejection (Mar. 11, 2021) at 2-11 (detailed action); Amendment/Response (June 11, 2021) at 5-12; Non-Final Rejection (June 24, 2021) at 2-6; Amendment/Response (Sep. 24, 2021) at 2-4 (claims), 5-8 (remarks); Terminal Disclaimer (Sep. 24, 2021) at 1; Final Rejection (Dec. 17, 2021) at 2-5; Interview Summary (Feb. 15, 2022) at 1; Notice of Allowability (Feb. 15,</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					2022) at 2-4 (examiner's amendment); The '390 Patent's Prosecution: Application (Feb. 16, 2022) at 14-17 (claims); Non-Final Rejection (Sep. 15, 2022) at 2-9 (detailed action); Amendment/Response (Dec. 15, 2022) at 4-7 (claims), 8-13 (remarks); Terminal disclaimer (Dec. 15, 2022) at 1; Non-Final Rejection (Apr. 6, 2023) at 2-5 (detailed action); Amendment/Response (July 6, 2023) at 2-5 (claims), 6-10; Notice of Allowability (Aug. 3, 2023) at 2-3 (detailed action); Comments on Reasons for Allowance (Aug. 14, 2023) at 1-2;

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>The '896 Patent's Prosecution: Application (June 7, 2023) at 14-22 (claims); Terminal Disclaimer (Dec. 1, 2023) at 1-2; Notice of Allowability (Dec. 15, 2023) at 2-4 (detailed action)</p> <p>Plaintiff's Infringement Contentions for the '101, '667, '390, and '896 Patents;</p> <p>Plaintiff's Claim Charts for the '101,¹⁸ '667,¹⁹ and '896²⁰ Patents for Champion Products;</p>

¹⁸ CPN010315, CPN010319, CPN010323, CPN010327, CPN010331, CPN010335, CPN010339, CPN010343, CPN010347, CPN010351,

¹⁹ CPN010355, CPN010360, CPN010365, CPN010370, CPN010375, CPN010380, CPN010385, CPN010390, CPN010395, CPN010400,

²⁰ CPN010405, CPN010410, CPN010415, CPN010420, CPN010425, CPN010429, CPN010434, CPN010438, CPN010442, CPN010446,

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					Plaintiff's Licensing Efforts; ²¹ Philip L. Skousen, Valve Handbook (McGraw-Hill eds., 3rd ed. 2011): Chapters 1, 3, 4, 5
fuel lockout apparatus	10,221,780 [1-2, 6, 8-9, 15] 11,492,985 [6]	plain and ordinary meaning	'780 Patent col. 5 ln. 37:col. 6 ln. 31, FIGS. 2-4B and corresponding locations in the '654 Patent, '895 Patent, '970 Patent, and '985 Patent).	a moveable barrier whose positioning prohibits a subsequent user action necessary to enable a different fuel source ²²	The '780 Patent ²³ at Abstract; 1:63-2:13, 2:39-59,3:65-4:17, 5:16-64, 6:10-53, 7:30-9:17,

²¹ CPN010453, CPN010456, CPN010642, CPN010648, CPN010650, CPN010669,

²² Champion objects to Firman's construction of "fuel lockout apparatus." On Wednesday, March 5, 2025, at 2:40PM MT, Firman again amended its proposed construction. Firman's previous proposed construction was: "an apparatus whose positioning prohibits a subsequent user action necessary to enable a different fuel source." Champion requested that Firman withdraw its new construction, which Firman declined. Champion's expert indicated he did not have time to address Firman's new change by the expert disclosure deadline of March 7, 2025. Champion's expert report addresses Firman's previous construction. Champion reserves the right to supplement its expert report to address Firman's new construction. Firman objects that this does not comply with the Case Management Order.

²³ The specification, including the Abstract, Figures, Background, and Descriptions, are identical for the '780 Patent, '654 Patent, '985 Patent, '970 Patent, and '895 Patent. Therefore, Firman incorporates by reference all parallel portions of the '780, '654, '985, '970, and '895 Patents' specification as if expressly cited herein.

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
	11,530,654 [1, 6-7] 11,840,970 [4-5, 26-27, 50-51] 11,905,895 [1-2, 6, 8, 12, 14-15]		<p>Dr. Singhose is expected to testify that a person having ordinary skill in the art would accord this term its plain and ordinary meaning consistent with and understood in light of the specification and claim language.</p> <p>Dr. Singhose is also expected to respond to any proposed construction of the term other than in accord with its plain and ordinary meaning.</p> <p>Champion may also use any materials referenced by Firman.</p>		<p>10:40-61; Fig Nos. 2-4B;²⁴</p> <p>The '780, '654, '985, '970, and '895 Patents' claims;</p> <p>The '780 Patent's Prosecution: Application (June 12, 2015) at 20-25 (claims); Non-Final Rejection (Aug. 3, 2017) at 2-6 (detailed action); Response (Nov. 3, 2017) at 8-16 (remarks); Non-Final Rejection (Feb. 22, 2018) at 2-12 (detailed action); Response (May 15, 2018) at 8-14 (remarks); Final Rejection (Sep. 5, 2018) at 2 (detailed action); Amendment/Response (Nov. 5, 2011) at 2-5</p>

²⁴ Firman's Citations to patent figures includes the figure it expressly identifies by number, as well as all textual discussions of that figure within the relevant patent's written description.

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					<p>(claims), 6-8 (remarks); Notice of Allowability (Dec. 11-2018) at 2-3 (detailed action);</p> <p>The '654 Patent's Prosecution: Application (Nov. 15, 2018) at 20-24 (claims); Non-Final Rejection (Mar. 11, 2019) at 2-7 (detailed action);</p> <p>Amendment/Response (May 22, 2022) at 2 (title), 3 (abstract), 4-8 (claims), 9-14 (remarks);</p> <p>Final Rejection (Aug. 30,2019) at 2-8 (detailed action);</p> <p>Amendment/Response (Oct. 30, 2019) at 2-6 (claims), 7-13 (remarks);</p> <p>Advisory Action (Dec. 5, 2019) at 2; Appeal Brief (Feb. 28, 2020) at 1-19;</p> <p>Non-Final Rejection (Apr. 30, 2020) at 2-9</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					(detailed action); Amendment/Response (July 16, 2020) at 2-6 (claims), 7-13 (remarks); Final Rejection (Oct. 28, 2020) at 2-12 (detailed action); Amendment/Response (Nov. 25, 2020) at 7-15 (remarks); Advisory Action (Dec. 7, 2020) at 2-8; Appeal Brief (Mar. 29, 2021) at 1-14; Examiner's Second Answer (Sep. 7, 2021) at 3-18; Reply Brief (Nov. 2, 2021) at 13; Board Decision (July 11, 2022) at 1-13; Amendment/Response (Aug. 11, 2022) at 2-5 (claims), 6 (remarks); Terminal Disclaimer (Sep. 8, 2022) at 1; Interview Summary (Sep. 14, 2022) at 1; Notice of Allowability (Oct. 5,

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					2022) at 2 (detailed action); The '985 Patent's Prosecution: Application (Feb. 6, 2020) at 20-24 (claims); Non-Final Rejection (July 27, 2020) at 2-9 (detailed action); Amendment/Response (Oct. 22, 2020) at 6-8 (remarks); Final Rejection (Feb. 1, 2021) at 2-10 (detailed action); Amendment/Response (Mar. 31, 2021) at 5 (claims), 6-12 (remarks); Advisory Action (Apr. 16, 2021) at 2-5; Appeal Brief (July 6, 2021) at 1-19; Examiner's Answer (Aug. 13, 2021) at 3-23; Reply Brief (Oct. 13, 2021) at 1-18; Board Decision (Apr. 14, 2022) at 1-8; Amendment/Response

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>(May 10, 2022) at 3 (claims), 6 (remarks); Notice of Allowability (July 7, 2022) at 2 (detailed action); Notice of Allowability (July 27, 2022) at 2 (detailed action); Comments on Reason for Allowance (Oct. 5, 2022) at 2;</p> <p>The '970 Patent's Prosecution: Application (Sep. 30, 2022) at 22-33 (claims); Non-Final Rejection (Mar. 1, 2023) at 2-8 (detailed action); Amendment/Response (June 1, 2023) at 7 (claims), 14-21 (remarks); Terminal Disclaimer (Sep. 14, 2023) at 1; Final Rejection (Sep. 14, 2023) at 2-3 (detailed action); Amendment/Response (Sep. 14, 2023) at 14</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>(remarks); Notice of Allowability (Sep. 27, 2023) at 2 (detailed action); Comments on Reason for Allowance (Oct. 31, 2023) at 2;</p> <p>The '895 Patent's Prosecution: Application (Mar. 14, 2023) at 20-25 (claims); Non-Final Rejection (Sep. 28, 2023) at 2-3 (detailed action); Terminal Disclaimer (Dec. 1, 2023) at 1-2; Notice of Allowability (Dec. 21, 2023) at 2 (detailed action);</p> <p>Plaintiff's Infringement Contentions for the '780, '654, '985, '970, and '895 Patents;</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>Plaintiff's Claim Charts for the '780,²⁵ and '895²⁶ Patents;</p> <p>Dr. Jacobs may provide testimony explaining that a person of ordinary skill in the art would not have understood this term to have a meaning as a term of art.</p> <p>Dr. Jacobs may also provide testimony explaining how a person of ordinary skill in the art would interpret portions of the specification(s) relevant to this term;</p>

²⁵ CPN010058, CPN010069, CPN010080, CPN010091, CPN010102,

²⁶ CPN010268, CPN010275, CPN010282, CPN010289, CPN010296,

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
electro-mechanical valve system	10,393,034 [11, 13-14] 11,143,120 [13, 15]	plain and ordinary meaning	'034 Patent col. 6 ln. 37:col. 8 ln. 15, col. 10 ln. 6:col. 11 ln. 37, FIGS. 2-3 (and corresponding locations in the '120 Patent). Dr. Singhose is expected to testify that a person having ordinary skill in the art would accord this term its plain and ordinary meaning consistent with and understood in light of the specification and claim language.	a system of one or more solenoid valves ²⁷	The '034 Patent ²⁸ at 2:24-45, 5:30-5:46, 5:62-6:55, 7:24-37, 7:65-8:31, 8:44-9:42, 10:6-55, 12:61-7; Fig Nos. 2-3; ²⁹ The '034 and '120 Patents' claims; The '034 Patent's Prosecution :Application (Oct. 4, 2016) at 23-28 (claims); Non-Final Rejection (Feb. 2, 2018) at 2-13 (detailed action);

²⁷ Champion objects to Firman's construction of "electro-mechanical valve system." On Wednesday, March 5, 2025, at 2:40PM MT, Firman again amended its proposed construction. Firman's previous proposed construction was: "a system of one or more electrically controlled solenoid valves." Champion requested that Firman withdraw its new construction, which Firman declined. Champion's expert indicated he did not have time to address Firman's new change by the expert disclosure deadline of March 7, 2025. Champion's expert report addresses Firman's previous construction. Champion reserves the right to supplement its expert report to address Firman's new construction. Firman objects that this does not comply with the Case Management Order.

²⁸ The specification, including the Abstract, Figures, Background, and Descriptions, are identical for the '034 Patent and '120 Patent. Therefore, Firman incorporates by reference all parallel portions of the '034 and '120 Patents' specification as if expressly cited herein.

²⁹ Firman's Citations to patent figures includes the figure it expressly identifies by number, as well as all textual discussions of that figure within the relevant patent's written description.

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
			<p>Dr. Singhose is also expected to respond to any proposed construction of the term other than in accord with its plain and ordinary meaning.</p> <p>Champion may also use any materials referenced by Firman.</p>		<p>Amendment/Response (May 2, 2018) at 3 (claims), 7-16 (remarks); Final Rejection (June 8, 2018) at 2-14 (detailed action); Amendment/Response (Aug. 3, 2018) at 2 (claims), 7-16 (remarks); Advisory Action (Aug. 16, 2018) at 1-2; Appeal Brief (Nov. 13, 2018) at 1-28; Non-Final Rejection (Jan. 25, 2019) at 2-19 (detailed action); Amendment/Response (Apr. 25, 2019) at 2-6 (claims), 7-12 (remarks); Notice of Allowability (June 18, 2019) at 2 (detailed action); Comments on Reason for Allowance (July 9, 2019) at 2; Certificate of Correction (Jan. 7, 2020) at 1;</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>The '120 Patent's Prosecution: Application (June 22, 2020) at 1-5 (claims); Notice of Allowability (June 18, 2019) at 2 (detailed action);</p> <p>Plaintiff's Infringement Contentions for the '034 and '120 Patents;</p> <p>Plaintiff's Claim Charts for the '034³⁰ and '120³¹ Patents;</p> <p>Philip L. Skousen, Valve Handbook (McGraw-Hill eds., 3rd ed. 2011): Chapters 1, 3, 4, 5;</p> <p>Dr. Jacobs may provide testimony explaining that a person of ordinary skill in the art would not have</p>

³⁰ CPN010112, CPN010121, CPN010131, CPN010140, CPN010150

³¹ CPN010212, CPN010216, CPN010220, CPN010224, CPN010228

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					understood this term to have a meaning as a term of art.
switch to change operation of the engine between gaseous fuel and liquid fuel switch ... to change operation of the engine between gaseous fuel and liquid fuel	10,697,398 [1, 57] 11,143,145 [1]	plain and ordinary meaning	'398 Patent col. 9 ln. 48:col. 10 ln. 11, col. 10 ln. 67:col. 11 ln. 8, FIGS. 4A-4B (and corresponding locations in the '145 Patent) Dr. Singhose is expected to testify that a person having ordinary skill in the art would accord this term its plain and ordinary meaning consistent with and understood in light of the specification and claim language. Dr. Singhose is also expected to respond to any proposed construction of the term other than in accord	non-limiting intended use	The '398 Patent ³² at Abstract; 2:11-15, 2:46-51, 20:52-55, 21:21-23; The '398 and '145 Patents' claims; The '398 Patent's Prosecution :Application (Oct. 28, 2015) at 36-45 (claims); Election/Restriction Required (Apr. 21, 2017) at 2-4 (detailed action); Response (June 21, 2017) at 1-10 (claims), 11-13 (remarks); Final Rejection (Aug. 7, 2017) at 2-10 (detailed action); Amendment/Response

³² The specification, including the Abstract, Figures, Background, and Descriptions, are identical for the '398 Patent and '145 Patent. Therefore, Firman incorporates by reference all parallel portions of the '398 and '145 Patents' specification as if expressly cited herein.

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
			<p>with its plain and ordinary meaning.</p> <p>Champion may also use any materials referenced by Firman.</p>		<p>(Nov. 6, 2017) at 12-16 (remarks); Petition Decision (Dec. 5, 2017); Non-Final Rejection (Jan. 26, 2018) at 2-14 (detailed action); Amendment/Response (Apr, 24, 2018) at 4 , 6-8 (claims), 12-18 (remarks); Final Rejection (June 14, 2018) at 2-17 (detailed action); Amendment/Response (Aug. 3, 2018) at 2, 4, 7-9, 11 (claims), 12-16 (remarks); Advisory Action (Aug. 16, 2018) at 1; Request for Reconsideration (Sep. 14, 2008) at 2, (claims), 12-16 (remarks); Non-Final Rejection (Oct. 11, 2018) at 2-15 (detailed action); Amendment/Response (Jan. 11, 2019) at 12-19 (remarks); Non-Final Rejection (Feb. 26, 2019)</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>at 2-15 (detailed action); Amendment/Response (May 28, 2019) at 2 (claims), 12-21 (remarks); Final Rejection (July 22, 2019) at 2-16 (detailed action); Appeal Brief (Jan. 22, 2020) at 1-33; Notice of Allowability (Mar. 6, 2020) at 2 (detailed action); Comments on Reason for Allowance (May 20, 2020) at 2;</p> <p>The '145 Patent's Prosecution: Application (June 22, 2020) at 1-4 (claims); Notice of Allowability (May 21, 2021) at 2 (detailed action); Request for Continued Examination (July 1, 2021) at 1; Notice of Allowability (July 12, 2021) at 2-3 (detailed action);</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>Certificate of Correction (Dec. 28, 2021);</p> <p>Plaintiff's Infringement Contentions for the '398 and '145 Patents;</p> <p>Plaintiff's Claim Charts for the '398³³ and '145³⁴ Patents.</p> <p>Dr. Jacobs may also provide testimony explaining how a person of ordinary skill in the art would interpret portions of the specification(s) relevant to this term;</p>

³³ CPN010160, CPN010171, CPN010182, CPN010192, CPN010202,

³⁴ CPN010232, CPN010239, CPN010246, CPN010253, CPN010260,

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
prevent[s] actuation of the mechanical fuel valve	10,221,780 [2, 8, 15] 11,905,895 [2, 8]	plain and ordinary meaning	'780 Patent col. 6 ln. 42:53, FIGS. 2-4B (and corresponding locations in the '654 Patent, '895 Patent, and '970 Patent). Dr. Singhose is expected to testify that a person having ordinary skill in the art would accord this term its plain and ordinary meaning consistent with and understood in light of the specification and claim language. Dr. Singhose is also expected to respond to any proposed construction of the term other than in accord	prevent[s] the mechanical fuel valve from moving	The '780 Patent ³⁵ at Abstract; 1:44-2:59, 3:5-22, 5:16-7:67, 8:38-64, 9:4-17, 10:46-11:39; Fig Nos. 2-4B; ³⁶ The '780, '654, '985, '970, and '895 Patents' claims; The '780 Patent's Prosecution: Application (June 12, 2015) at 20-25 (claims); Non-Final Rejection (Aug. 3, 2017) at 2-6 (detailed action); Response (Nov. 3, 2017) at 8-16 (remarks); Non-Final Rejection (Feb. 22, 2018) at 2-12 (detailed

³⁵ The specification, including the Abstract, Figures, Background, and Descriptions, are identical for the '780 Patent, '654 Patent, '985 Patent, '970 Patent, and '895 Patent. Therefore, Firman incorporates by reference all parallel portions of the '780, '654, '985, '970, and '895 Patents' specification as if expressly cited herein.

³⁶ Firman's Citations to patent figures includes the figure it expressly identifies by number, as well as all textual discussions of that figure within the relevant patent's written description.

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
			<p>with its plain and ordinary meaning.</p> <p>Champion may also use any materials referenced by Firman.</p>		<p>action); Response (May 15, 2018) at 8-14 (remarks); Final Rejection (Sep. 5, 2018) at 2 (detailed action); Amendment/Response (Nov. 5, 2011) at 2-5 (claims), 6-8 (remarks); Notice of Allowability (Dec. 11-2018) at 2-3 (detailed action);</p> <p>The '654 Patent's Prosecution: Application (Nov. 15, 2018) at 20-24 (claims); Non-Final Rejection (Mar. 11, 2019) at 2-7 (detailed action); Amendment/Response (May 22, 2022) at 2 (title), 3 (abstract), 4-8 (claims), 9-14 (remarks); Final Rejection (Aug. 30, 2019) at 2-8 (detailed action); Amendment/Response</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion’s Proposed Construction	Champion’s Support¹	Firman’s Proposed Construction	Firman’s Support
					(Oct. 30, 2019) at 2-6 (claims), 7-13 (remarks); Advisory Action (Dec. 5, 2019) at 2; Appeal Brief (Feb. 28, 2020) at 1-19; Non-Final Rejection (Apr. 30, 2020) at 2-9 (detailed action); Amendment/Response (July 16, 2020) at 2-6 (claims), 7-13 (remarks); Final Rejection (Oct. 28, 2020) at 2-12 (detailed action); Amendment/Response (Nov. 25, 2020) at 7-15 (remarks); Advisory Action (Dec. 7, 2020) at 2-8; Appeal Brief (Mar. 29, 2021) at 1-14; Examiner’s Second Answer (Sep. 7, 2021) at 3-18; Reply Brief (Nov. 2, 2021) at 13; Board Decision (July 11, 2022) at 1-13; Amendment/Response

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>(Aug. 11, 2022) at 2-5 (claims), 6 (remarks); Terminal Disclaimer (Sep. 8, 2022) at 1; Interview Summary (Sep. 14, 2022) at 1; Notice of Allowability (Oct. 5, 2022) at 2 (detailed action);</p> <p>The '985 Patent's Prosecution: Application (Feb. 6, 2020) at 20-24 (claims); Non-Final Rejection (July 27, 2020) at 2-9 (detailed action); Amendment/Response (Oct. 22, 2020) at 6-8 (remarks); Final Rejection (Feb. 1, 2021) at 2-10 (detailed action); Amendment/Response (Mar. 31, 2021) at 5 (claims), 6-12 (remarks); Advisory Action (Apr. 16, 2021) at 2-5; Appeal Brief (July 6, 2021) at 1-</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>19; Examiner's Answer (Aug. 13, 2021) at 3-23; Reply Brief (Oct. 13, 2021) at 1-18; Board Decision (Apr. 14, 2022) at 1-8; Amendment/Response (May 10, 2022) at 3 (claims), 6 (remarks); Notice of Allowability (July 7, 2022) at 2 (detailed action); Notice of Allowability (July 27, 2022) at 2 (detailed action); Comments on Reason for Allowance (Oct. 5, 2022) at 2;</p> <p>The '970 Patent's Prosecution: Application (Sep. 30, 2022) at 22-33 (claims); Non-Final Rejection (Mar. 1, 2023) at 2-8 (detailed action); Amendment/Response (June 1, 2023) at 7 (claims), 14-21</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>(remarks); Terminal Disclaimer (Sep. 14, 2023) at 1; Final Rejection (Sep. 14, 2023) at 2-3 (detailed action); Amendment/Response (Sep. 14, 2023) at 14 (remarks); Notice of Allowability (Sep. 27, 2023) at 2 (detailed action); Comments on Reason for Allowance (Oct. 31, 2023) at 2;</p> <p>The '895 Patent's Prosecution: Application (Mar. 14, 2023) at 20-25 (claims); Non-Final Rejection (Sep. 28, 2023) at 2-3 (detailed action); Terminal Disclaimer (Dec. 1, 2023) at 1-2; Notice of Allowability (Dec. 21, 2023) at 2 (detailed action);</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					Plaintiff's Infringement Contentions for the '780, '654, '985, '970, and '895 Patents. Plaintiff's Claim Charts for the '780, ³⁷ and '895 ³⁸ Patents
prevent the mechanical fuel valve from opening the liquid fuel line	11,530,654 [7] 11,840,970 [5, 27, 51] 11,905,895 [15]	plain and ordinary meaning	'780 Patent col. 6 ln. 42:53, FIGS. 2-4B (and corresponding locations in the '895 Patent). Dr. Singhose is expected to testify that a person having ordinary skill in the art would accord this term its plain and ordinary	prevent[s] the mechanical fuel valve from moving	The '780 Patent ³⁹ at Abstract; 1:44-2:59, 3:5-22, 5:16-7:67, 8:38-64, 9:4-17, 10:46-11:39; Fig Nos. 2-4B; ⁴⁰ The '780, '654, '985, '970, and '895 Patents' claims;

³⁷ CPN010058, CPN010069, CPN010080, CPN010091, CPN010102,

³⁸ CPN010268, CPN010275, CPN010282, CPN010289, CPN010296,

³⁹ The specification, including the Abstract, Figures, Background, and Descriptions, are identical for the '780 Patent, '654 Patent, '985 Patent, '970 Patent, and '895 Patent. Therefore, Firman incorporates by reference all parallel portions of the '780, '654, '985, '970, and '895 Patents' specification as if expressly cited herein.

⁴⁰ Firman's Citations to patent figures includes the figure it expressly identifies by number, as well as all textual discussions of that figure within the relevant patent's written description.

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
			<p>meaning consistent with and understood in light of the specification and claim language.</p> <p>Dr. Singhose is also expected to respond to any proposed construction of the term other than in accord with its plain and ordinary meaning.</p> <p>Champion may also use any materials referenced by Firman.</p>		<p>The '780 Patent's Prosecution: Application (June 12, 2015) at 20-25 (claims); Non-Final Rejection (Aug. 3, 2017) at 2-6 (detailed action); Response (Nov. 3, 2017) at 8-16 (remarks); Non-Final Rejection (Feb. 22, 2018) at 2-12 (detailed action); Response (May 15, 2018) at 8-14 (remarks); Final Rejection (Sep. 5, 2018) at 2 (detailed action); Amendment/Response (Nov. 5, 2011) at 2-5 (claims), 6-8 (remarks); Notice of Allowability (Dec. 11-2018) at 2-3 (detailed action);</p> <p>The '654 Patent's Prosecution: Application (Nov. 15, 2018) at 20-24 (claims); Non-Final Rejection (Mar. 11,</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					2019) at 2-7 (detailed action); Amendment/Response (May 22, 2022) at 2 (title), 3 (abstract), 4-8 (claims), 9-14 (remarks); Final Rejection (Aug. 30, 2019) at 2-8 (detailed action); Amendment/Response (Oct. 30, 2019) at 2-6 (claims), 7-13 (remarks); Advisory Action (Dec. 5, 2019) at 2; Appeal Brief (Feb. 28, 2020) at 1-19; Non-Final Rejection (Apr. 30, 2020) at 2-9 (detailed action); Amendment/Response (July 16, 2020) at 2-6 (claims), 7-13 (remarks); Final Rejection (Oct. 28, 2020) at 2-12 (detailed action); Amendment/Response (Nov. 25, 2020) at 7-15 (remarks); Advisory

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					<p>Action (Dec. 7, 2020) at 2-8; Appeal Brief (Mar. 29, 2021) at 1-14; Examiner's Second Answer (Sep. 7, 2021) at 3-18; Reply Brief (Nov. 2, 2021) at 13; Board Decision (July 11, 2022) at 1-13; Amendment/Response (Aug. 11, 2022) at 2-5 (claims), 6 (remarks); Terminal Disclaimer (Sep. 8, 2022) at 1; Interview Summary (Sep. 14, 2022) at 1; Notice of Allowability (Oct. 5, 2022) at 2 (detailed action);</p> <p>The '985 Patent's Prosecution: Application (Feb. 6, 2020) at 20-24 (claims); Non-Final Rejection (July 27, 2020) at 2-9 (detailed action); Amendment/Response</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion’s Proposed Construction	Champion’s Support¹	Firman’s Proposed Construction	Firman’s Support
					(Oct. 22, 2020) at 6-8 (remarks); Final Rejection (Feb. 1, 2021) at 2-10 (detailed action); Amendment/Response (Mar. 31, 2021) at 5 (claims), 6-12 (remarks); Advisory Action (Apr. 16, 2021) at 2-5; Appeal Brief (July 6, 2021) at 1-19; Examiner’s Answer (Aug. 13, 2021) at 3-23; Reply Brief (Oct. 13, 2021) at 1-18; Board Decision (Apr. 14, 2022) at 1-8; Amendment/Response (May 10, 2022) at 3 (claims), 6 (remarks); Notice of Allowability (July 7, 2022) at 2 (detailed action); Notice of Allowability (July 27, 2022) at 2 (detailed action); Comments on

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					Reason for Allowance (Oct. 5, 2022) at 2; The '970 Patent's Prosecution: Application (Sep. 30, 2022) at 22-33 (claims); Non-Final Rejection (Mar. 1, 2023) at 2-8 (detailed action); Amendment/Response (June 1, 2023) at 7 (claims), 14-21 (remarks); Terminal Disclaimer (Sep. 14, 2023) at 1; Final Rejection (Sep. 14, 2023) at 2-3 (detailed action); Amendment/Response (Sep. 14, 2023) at 14 (remarks); Notice of Allowability (Sep. 27, 2023) at 2 (detailed action); Comments on Reason for Allowance (Oct. 31, 2023) at 2;

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>The '895 Patent's Prosecution: Application (Mar. 14, 2023) at 20-25 (claims); Non-Final Rejection (Sep. 28, 2023) at 2-3 (detailed action); Terminal Disclaimer (Dec. 1, 2023) at 1-2; Notice of Allowability (Dec. 21, 2023) at 2 (detailed action);</p> <p>Plaintiff's Infringement Contentions for the '780, '654, '985, '970, and '895 Patents.</p> <p>Plaintiff's Claim Charts for the '780,⁴¹ and '895⁴² Patents</p>

⁴¹ CPN010058, CPN010069, CPN010080, CPN010091, CPN010102,

⁴² CPN010268, CPN010275, CPN010282, CPN010289, CPN010296,

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
simultaneously	10,221,780 [6] 11,905,895 [6, 12] 10,393,034 [6]	plain and ordinary meaning, which includes two or more acts occurring over an overlapping time period; alternatively, two or more acts occurring over an overlapping time period.	'780 patent col. 1 ln. 44:55, col. 5 ln. 23:28 (and corresponding locations in the '895 Patent); '034 Patent col. 7 ln. 32-37, col. 7 ln. 65:col. 8 ln. 15, col. 8 ln. 65:col. 9 ln. 10, col. 10 ln. 21:55 Dr. Singhose is expected to testify that a person having ordinary skill in the art would accord this term its plain and ordinary meaning consistent with and understood in light of the specification and claim language, to include concurrently or close in time. Dr. Singhose is	concurrently	The '780 Patent ⁴³ at 1:11, 7:65-8:15, 8:32-43, 8:57-9:10, 10:36-55; The '034 Patent ⁴⁴ at 1:56-2:11, 7:65-8:15, 8:32-43, 8:57-9:10, 10:36-55, Fig. Nos. 2-3; ⁴⁵ The '780, '654, '985, '970, and '895 Patents' claims; The '034 and '120 Patents' claims; The '780 Patent's Prosecution: Application

⁴³ The specification, including the Abstract, Figures, Background, and Descriptions, are identical for the '780 Patent, '654 Patent, '985 Patent, '970 Patent, and '895 Patent. Therefore, Firman incorporates by reference all parallel portions of the '780, '654, '985, '970, and '895 Patents' specification as if expressly cited herein.

⁴⁴ The specification, including the Abstract, Figures, Background, and Descriptions, are identical for the '034 Patent and '120 Patent. Therefore, Firman incorporates by reference all parallel portions of the '034 and '120 Patents' specification as if expressly cited herein.

⁴⁵ Firman's Citations to patent figures includes the figure it expressly identifies by number, as well as all textual discussions of that figure within the relevant patent's written description.

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
			<p>also expected to testify that the term “simultaneously” is context specific. In any system that changes from one state to another (including a system involving fluid flows), a person having ordinary skill in the art would understand that there is a finite amount of time that passes, characterized by a time constant relevant to the particular system, when a system goes from one state to another (for example, the transition to open or close the fluid flow). In a transition from one state to a second state according to this time constant, a person having ordinary skill in the art would understand that transition to have occurred “simultaneously.”</p>		<p>(June 12, 2015) at 20-25 (claims); Non-Final Rejection (Aug. 3, 2017) at 2-6 (detailed action); Response (Nov. 3, 2017) at 8-16 (remarks); Non-Final Rejection (Feb. 22, 2018) at 2-12 (detailed action); Response (May 15, 2018) at 8-14 (remarks); Final Rejection (Sep. 5, 2018) at 2 (detailed action); Amendment/Response (Nov. 5, 2011) at 2-5 (claims), 6-8 (remarks); Notice of Allowability (Dec. 11-2018) at 2-3 (detailed action);</p> <p>The '654 Patent's Prosecution: Application (Nov. 15, 2018) at 20-24 (claims); Non-Final Rejection (Mar. 11, 2019) at 2-7 (detailed action);</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
			<p>Dr. Singhose is also expected to respond to any proposed construction of the term other than in accord with its plain and ordinary meaning.</p> <p>Champion may also use any materials referenced by Firman.</p>		<p>Amendment/Response (May 22, 2022) at 2 (title), 3 (abstract), 4-8 (claims), 9-14 (remarks); Final Rejection (Aug. 30, 2019) at 2-8 (detailed action);</p> <p>Amendment/Response (Oct. 30, 2019) at 2-6 (claims), 7-13 (remarks); Advisory Action (Dec. 5, 2019) at 2; Appeal Brief (Feb. 28, 2020) at 1-19; Non-Final Rejection (Apr. 30, 2020) at 2-9 (detailed action);</p> <p>Amendment/Response (July 16, 2020) at 2-6 (claims), 7-13 (remarks); Final Rejection (Oct. 28, 2020) at 2-12 (detailed action);</p> <p>Amendment/Response (Nov. 25, 2020) at 7-15 (remarks); Advisory Action (Dec. 7, 2020) at 2-8; Appeal Brief (Mar.</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>29, 2021) at 1-14; Examiner's Second Answer (Sep. 7, 2021) at 3-18; Reply Brief (Nov. 2, 2021) at 13; Board Decision (July 11, 2022) at 1-13; Amendment/Response (Aug. 11, 2022) at 2-5 (claims), 6 (remarks); Terminal Disclaimer (Sep. 8, 2022) at 1; Interview Summary (Sep. 14, 2022) at 1; Notice of Allowability (Oct. 5, 2022) at 2 (detailed action);</p> <p>The '985 Patent's Prosecution: Application (Feb. 6, 2020) at 20-24 (claims); Non-Final Rejection (July 27, 2020) at 2-9 (detailed action); Amendment/Response (Oct. 22, 2020) at 6-8 (remarks); Final</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					Rejection (Feb. 1, 2021) at 2-10 (detailed action); Amendment/Response (Mar. 31, 2021) at 5 (claims), 6-12 (remarks); Advisory Action (Apr. 16, 2021) at 2-5; Appeal Brief (July 6, 2021) at 1-19; Examiner's Answer (Aug. 13, 2021) at 3-23; Reply Brief (Oct. 13, 2021) at 1-18; Board Decision (Apr. 14, 2022) at 1-8; Amendment/Response (May 10, 2022) at 3 (claims), 6 (remarks); Notice of Allowability (July 7, 2022) at 2 (detailed action); Notice of Allowability (July 27, 2022) at 2 (detailed action); Comments on Reason for Allowance (Oct. 5, 2022) at 2;

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>The '970 Patent's Prosecution: Application (Sep. 30, 2022) at 22-33 (claims); Non-Final Rejection (Mar. 1, 2023) at 2-8 (detailed action); Amendment/Response (June 1, 2023) at 7 (claims), 14-21 (remarks); Terminal Disclaimer (Sep. 14, 2023) at 1; Final Rejection (Sep. 14, 2023) at 2-3 (detailed action); Amendment/Response (Sep. 14, 2023) at 14 (remarks); Notice of Allowability (Sep. 27, 2023) at 2 (detailed action); Comments on Reason for Allowance (Oct. 31, 2023) at 2;</p> <p>The '895 Patent's Prosecution: Application (Mar. 14, 2023) at 20-25 (claims); Non-Final</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					<p>Rejection (Sep. 28, 2023) at 2-3 (detailed action); Terminal Disclaimer (Dec. 1, 2023) at 1-2; Notice of Allowability (Dec. 21, 2023) at 2 (detailed action);</p> <p>The '034 Patent's Prosecution :Application (Oct. 4, 2016) at 23-28 (claims); Non-Final Rejection (Feb. 2, 2018) at 2-13 (detailed action); Amendment/Response (May 2, 2018) at 3 (claims), 7-16 (remarks); Final Rejection (June 8, 2018) at 2-14 (detailed action); Amendment/Response (Aug. 3, 2018) at 2 (claims), 7-16 (remarks); Advisory Action (Aug. 16, 2018) at 1-2; Appeal Brief (Nov. 13, 2018) at 1-28; Non-Final</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					<p>Rejection (Jan. 25, 2019) at 2-19 (detailed action); Amendment/Response (Apr. 25, 2019) at 2-6 (claims), 7-12 (remarks); Notice of Allowability (June 18, 2019) at 2 (detailed action); Comments on Reason for Allowance (July 9, 2019) at 2; Certificate of Correction (Jan. 7, 2020) at 1;</p> <p>The '120 Patent's Prosecution: Application (June 22, 2020) at 1-5 (claims); Notice of Allowability (June 18, 2019) at 2 (detailed action);</p> <p>Plaintiff's Infringement Contentions for the '780, '654, '985, '970, and '895 Patents.</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					Plaintiff's Infringement Contentions for the '034 and '120 Patents. Plaintiff's Claim Charts for the '780, ⁴⁶ and '895 ⁴⁷ Patents; Plaintiff's Claim Charts for the '034 ⁴⁸ and '120 ⁴⁹ Patents.
selectively control fuel flow to the dual fuel engine from a first fuel source through a first fuel line	10,221,780 [1 ⁵⁰ , 15] 11,492,985 [5, 15]	plain and ordinary meaning	'780 Patent col. 5 ln. 31:col. 6 ln. 31, col. 7 ln. 45:col. 9 ln. 17, FIGS. 2-4B (and corresponding locations in the '654 Patent '895	a portion of the mechanical fuel valve mechanically blocks fuel flow from one fuel source while unblocking fuel flow	The '780 Patent ⁵¹ at Abstract; 1:44-2:59, 3:5-22, 5:16-7:67, 8:38-64,

⁴⁶ CPN010058, CPN010069, CPN010080, CPN010091, CPN010102,

⁴⁷ CPN010268, CPN010275, CPN010282, CPN010289, CPN010296,

⁴⁸ CPN010112, CPN010121, CPN010131, CPN010140, CPN010150

⁴⁹ CPN010212, CPN010216, CPN010220, CPN010224, CPN010228

⁵⁰ Firman's designation of this claim term also applies to the variation found in Claim 8 of 10,221,780

⁵¹ The specification, including the Abstract, Figures, Background, and Descriptions, are identical for the '780 Patent, '654 Patent, '985 Patent, '970 Patent, and '895 Patent. Therefore, Firman incorporates by reference all parallel portions of the '780, '654, '985, '970, and '895 Patents' specification as if expressly cited herein.

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
and a second fuel source through a second fuel line selectively control fuel flow to the ... [generator / engine] from the liquid fuel source through the liquid fuel line and the pressurized fuel source through the gaseous fuel line	11,530,654 [1, 6] 11,840,970 [1, 12, 20, 44] 11,905,895 [1, 8, 14]		Patent, '970 Patent, and '985 Patent). Dr. Singhose is expected to testify that a person having ordinary skill in the art would accord this term its plain and ordinary meaning consistent with and understood in light of the specification and claim language. Dr. Singhose is also expected to respond to any proposed construction of the term other than in accord with its plain and ordinary meaning. Champion may also use any materials referenced by Firman.	from a second fuel source	9:4-17, 10:46-11:39; Fig Nos. 2-4B ; ⁵² The '780, '654, '985, '970, and '895 Patents' claims; The '780 Patent's Prosecution: Application (June 12, 2015) at 20-25 (claims); Non-Final Rejection (Aug. 3, 2017) at 2-6 (detailed action); Response (Nov. 3, 2017) at 8-16 (remarks); Non-Final Rejection (Feb. 22, 2018) at 2-12 (detailed action); Response (May 15, 2018) at 8-14 (remarks); Final Rejection (Sep. 5, 2018) at 2 (detailed action); Amendment/Response (Nov. 5, 2011) at 2-5

⁵² Firman's Citations to patent figures includes the figure it expressly identifies by number, as well as all textual discussions of that figure within the relevant patent's written description.

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>(claims), 6-8 (remarks); Notice of Allowability (Dec. 11-2018) at 2-3 (detailed action);</p> <p>The '654 Patent's Prosecution: Application (Nov. 15, 2018) at 20-24 (claims); Non-Final Rejection (Mar. 11, 2019) at 2-7 (detailed action);</p> <p>Amendment/Response (May 22, 2022) at 2 (title), 3 (abstract), 4-8 (claims), 9-14 (remarks);</p> <p>Final Rejection (Aug. 30,2019) at 2-8 (detailed action);</p> <p>Amendment/Response (Oct. 30, 2019) at 2-6 (claims), 7-13 (remarks);</p> <p>Advisory Action (Dec. 5, 2019) at 2; Appeal Brief (Feb. 28, 2020) at 1-19;</p> <p>Non-Final Rejection (Apr. 30, 2020) at 2-9</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					(detailed action); Amendment/Response (July 16, 2020) at 2-6 (claims), 7-13 (remarks); Final Rejection (Oct. 28, 2020) at 2-12 (detailed action); Amendment/Response (Nov. 25, 2020) at 7-15 (remarks); Advisory Action (Dec. 7, 2020) at 2-8; Appeal Brief (Mar. 29, 2021) at 1-14; Examiner's Second Answer (Sep. 7, 2021) at 3-18; Reply Brief (Nov. 2, 2021) at 13; Board Decision (July 11, 2022) at 1-13; Amendment/Response (Aug. 11, 2022) at 2-5 (claims), 6 (remarks); Terminal Disclaimer (Sep. 8, 2022) at 1; Interview Summary (Sep. 14, 2022) at 1; Notice of Allowability (Oct. 5,

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					2022) at 2 (detailed action); The '985 Patent's Prosecution: Application (Feb. 6, 2020) at 20-24 (claims); Non-Final Rejection (July 27, 2020) at 2-9 (detailed action); Amendment/Response (Oct. 22, 2020) at 6-8 (remarks); Final Rejection (Feb. 1, 2021) at 2-10 (detailed action); Amendment/Response (Mar. 31, 2021) at 5 (claims), 6-12 (remarks); Advisory Action (Apr. 16, 2021) at 2-5; Appeal Brief (July 6, 2021) at 1-19; Examiner's Answer (Aug. 13, 2021) at 3-23; Reply Brief (Oct. 13, 2021) at 1-18; Board Decision (Apr. 14, 2022) at 1-8; Amendment/Response

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>(May 10, 2022) at 3 (claims), 6 (remarks); Notice of Allowability (July 7, 2022) at 2 (detailed action); Notice of Allowability (July 27, 2022) at 2 (detailed action); Comments on Reason for Allowance (Oct. 5, 2022) at 2;</p> <p>The '970 Patent's Prosecution: Application (Sep. 30, 2022) at 22-33 (claims); Non-Final Rejection (Mar. 1, 2023) at 2-8 (detailed action); Amendment/Response (June 1, 2023) at 7 (claims), 14-21 (remarks); Terminal Disclaimer (Sep. 14, 2023) at 1; Final Rejection (Sep. 14, 2023) at 2-3 (detailed action); Amendment/Response (Sep. 14, 2023) at 14</p>

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Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>(remarks); Notice of Allowability (Sep. 27, 2023) at 2 (detailed action); Comments on Reason for Allowance (Oct. 31, 2023) at 2;</p> <p>The '895 Patent's Prosecution: Application (Mar. 14, 2023) at 20-25 (claims); Non-Final Rejection (Sep. 28, 2023) at 2-3 (detailed action); Terminal Disclaimer (Dec. 1, 2023) at 1-2; Notice of Allowability (Dec. 21, 2023) at 2 (detailed action);</p> <p>Plaintiff's Infringement Contentions for the '780, '654, '985, '970, and '895 Patents.</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					Plaintiff's Claim Charts for the '780, ⁵³ and '895 ⁵⁴ Patents.
desired pressure	11,492,985 [1] 11,530,654 [1, 6, 10] 11,840,970 [1, 12, 14, 20] 11,905,895 [14] 10,393,034 [11, 24]	plain and ordinary meaning, any pressure enabling engine operation; alternatively, any pressure enabling engine operation	'034 Patent col. 4 ln. 9:13 (and the corresponding location in the '120 Patent); '780 patent col. 2 ln. 19:32; col. 4 ln. 18:24, FIG. 1 (and corresponding locations in the '654 Patent, '895 Patent, '970 Patent, and '985 Patent). Dr. Singhose is expected to testify that a person having	pressure at which the engine operates	The '780 Patent ⁵⁵ at 1:28-55, 2:14-38, 3:1-4, 3:13-25, 3:65--5:15, 6:54-7:29, 9:50-60, 10:62-11:17; Fig Nos. 1, 4A-5; ⁵⁶ The '034 Patent ⁵⁷ at 1:39-55, 2:24-60, 3:1-4,

⁵³ CPN010058, CPN010069, CPN010080, CPN010091, CPN010102,

⁵⁴ CPN010268, CPN010275, CPN010282, CPN010289, CPN010296,

⁵⁵ The specification, including the Abstract, Figures, Background, and Descriptions, are identical for the '780 Patent, '654 Patent, '985 Patent, '970 Patent, and '895 Patent. Therefore, Firman incorporates by reference all parallel portions of the '780, '654, '985, '970, and '895 Patents' specification as if expressly cited herein.

⁵⁶ Firman's Citations to patent figures includes the figure it expressly identifies by number, as well as all textual discussions of that figure within the relevant patent's written description.

⁵⁷ The specification, including the Abstract, Figures, Background, and Descriptions, are identical for the '034 Patent and '120 Patent. Therefore, Firman incorporates by reference all parallel portions of the '034 and '120 Patents' specification as if expressly cited herein.

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
	11,143,120 [12]		<p>ordinary skill in the art would accord this term its plain and ordinary meaning consistent with and understood in light of the specification and claim language, which any pressure enabling engine operation.</p> <p>Dr. Singhose is also expected to respond to any proposed construction of the term other than in accord with its plain and ordinary meaning.</p> <p>Champion may also use any materials referenced by Firman.</p>		<p>3:59-5:12, 12:54-13:71; Fig. No. 1;⁵⁸</p> <p>The '780, '654, '985, '970, and '895 Patents' claims;</p> <p>The '034 and '120 Patents' claims;</p> <p>The '780 Patent's Prosecution: Application (June 12, 2015) at 20-25 (claims); Non-Final Rejection (Aug. 3, 2017) at 2-6 (detailed action); Response (Nov. 3, 2017) at 8-16 (remarks); Non-Final Rejection (Feb. 22, 2018) at 2-12 (detailed action); Response (May 15, 2018) at 8-14 (remarks); Final Rejection (Sep. 5, 2018)</p>

⁵⁸ Firman's Citations to patent figures includes the figure it expressly identifies by number, as well as all textual discussions of that figure within the relevant patent's written description.

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>at 2 (detailed action); Amendment/Response (Nov. 5, 2011) at 2-5 (claims), 6-8 (remarks); Notice of Allowability (Dec. 11-2018) at 2-3 (detailed action);</p> <p>The '654 Patent's Prosecution: Application (Nov. 15, 2018) at 20-24 (claims); Non-Final Rejection (Mar. 11, 2019) at 2-7 (detailed action); Amendment/Response (May 22, 2022) at 2 (title), 3 (abstract), 4-8 (claims), 9-14 (remarks); Final Rejection (Aug. 30,2019) at 2-8 (detailed action); Amendment/Response (Oct. 30, 2019) at 2-6 (claims), 7-13 (remarks); Advisory Action (Dec. 5, 2019) at 2; Appeal Brief</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					<p>(Feb. 28, 2020) at 1-19; Non-Final Rejection (Apr. 30, 2020) at 2-9 (detailed action); Amendment/Response (July 16, 2020) at 2-6 (claims), 7-13 (remarks); Final Rejection (Oct. 28, 2020) at 2-12 (detailed action); Amendment/Response (Nov. 25, 2020) at 7-15 (remarks); Advisory Action (Dec. 7, 2020) at 2-8; Appeal Brief (Mar. 29, 2021) at 1-14; Examiner's Second Answer (Sep. 7, 2021) at 3-18; Reply Brief (Nov. 2, 2021) at 13; Board Decision (July 11, 2022) at 1-13; Amendment/Response (Aug. 11, 2022) at 2-5 (claims), 6 (remarks); Terminal Disclaimer (Sep. 8, 2022) at 1;</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>Interview Summary (Sep. 14, 2022) at 1; Notice of Allowability (Oct. 5, 2022) at 2 (detailed action);</p> <p>The '985 Patent's Prosecution: Application (Feb. 6, 2020) at 20-24 (claims); Non-Final Rejection (July 27, 2020) at 2-9 (detailed action); Amendment/Response (Oct. 22, 2020) at 6-8 (remarks); Final Rejection (Feb. 1, 2021) at 2-10 (detailed action); Amendment/Response (Mar. 31, 2021) at 5 (claims), 6-12 (remarks); Advisory Action (Apr. 16, 2021) at 2-5; Appeal Brief (July 6, 2021) at 1-19; Examiner's Answer (Aug. 13, 2021) at 3-23; Reply Brief (Oct. 13, 2021) at 1-18; Board</p>

EXHIBIT 1

Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>Decision (Apr. 14, 2022) at 1-8; Amendment/Response (May 10, 2022) at 3 (claims), 6 (remarks); Notice of Allowability (July 7, 2022) at 2 (detailed action); Notice of Allowability (July 27, 2022) at 2 (detailed action); Comments on Reason for Allowance (Oct. 5, 2022) at 2;</p> <p>The '970 Patent's Prosecution: Application (Sep. 30, 2022) at 22-33 (claims); Non-Final Rejection (Mar. 1, 2023) at 2-8 (detailed action); Amendment/Response (June 1, 2023) at 7 (claims), 14-21 (remarks); Terminal Disclaimer (Sep. 14, 2023) at 1; Final Rejection (Sep. 14, 2023)</p>

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Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>at 2-3 (detailed action); Amendment/Response (Sep. 14, 2023) at 14 (remarks); Notice of Allowability (Sep. 27, 2023) at 2 (detailed action); Comments on Reason for Allowance (Oct. 31, 2023) at 2;</p> <p>The '895 Patent's Prosecution: Application (Mar. 14, 2023) at 20-25 (claims); Non-Final Rejection (Sep. 28, 2023) at 2-3 (detailed action); Terminal Disclaimer (Dec. 1, 2023) at 1-2; Notice of Allowability (Dec. 21, 2023) at 2 (detailed action);</p> <p>The '034 Patent's Prosecution :Application (Oct. 4, 2016) at 23-28 (claims); Non-Final Rejection (Feb. 2, 2018)</p>

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Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					at 2-13 (detailed action); Amendment/Response (May 2, 2018) at 3 (claims), 7-16 (remarks); Final Rejection (June 8, 2018) at 2-14 (detailed action); Amendment/Response (Aug. 3, 2018) at 2 (claims), 7-16 (remarks); Advisory Action (Aug. 16, 2018) at 1-2; Appeal Brief (Nov. 13, 2018) at 1-28; Non-Final Rejection (Jan. 25, 2019) at 2-19 (detailed action); Amendment/Response (Apr. 25, 2019) at 2-6 (claims), 7-12 (remarks); Notice of Allowability (June 18, 2019) at 2 (detailed action); Comments on Reason for Allowance (July 9, 2019) at 2; Certificate of

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Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					<p>Correction (Jan. 7, 2020) at 1;</p> <p>The '120 Patent's Prosecution: Application (June 22, 2020) at 1-5 (claims); Notice of Allowability (June 18, 2019) at 2 (detailed action);</p> <p>Plaintiff's Infringement Contentions for the '780, '654, '985, '970, and '895 Patents.</p> <p>Plaintiff's Infringement Contentions for the '034 and '120 Patents.</p> <p>Plaintiff's Claim Charts for the '780,⁵⁹ and '895⁶⁰ Patents;</p>

⁵⁹ CPN010058, CPN010069, CPN010080, CPN010091, CPN010102,

⁶⁰ CPN010268, CPN010275, CPN010282, CPN010289, CPN010296,

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Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					Plaintiff's Claim Charts for the '034 ⁶¹ and '120 ⁶² Patents.
prevent[s] the ... fuel source from coupling... and ... permit[s] the ... fuel source to couple	10,221,780 [1, 8] 11,492,985 [6] 11,530,654 [1, 6] 11,840,970 [4, 26, 50] 11,905,895 [1, 14]	plain and ordinary meaning	'780 Patent col. 5 ln. 16:23, 31:64, col. 6 ln. 2:31, 42:53, col. 7 ln. 4:17, 60:67, FIGS. 2-4B (and corresponding locations in the '654 Patent, '895 Patent, '970 Patent, and '985 Patent). Dr. Singhose is expected to testify that a person having ordinary skill in the art would accord this term its plain and ordinary meaning consistent with and understood in	prevent[s] ... the fuel source from attaching ... and ... allow[s] the ... fuel source to attach	The '780 Patent ⁶³ at Abstract; 1:44-2:59, 3:5-22, 5:16-7:67, 8:38-64, 9:4-17, 10:46-11:39; Fig Nos. 2-4B; ⁶⁴ The '780, '654, '985, '970, and '895 Patents' claims; The '780 Patent's Prosecution: Application (June 12, 2015) at 20-25 (claims); Non-Final Rejection (Aug. 3, 2017)

⁶¹ CPN010112, CPN010121, CPN010131, CPN010140, CPN010150

⁶² CPN010212, CPN010216, CPN010220, CPN010224, CPN010228

⁶³ The specification, including the Abstract, Figures, Background, and Descriptions, are identical for the '780 Patent, '654 Patent, '985 Patent, '970 Patent, and '895 Patent. Therefore, Firman incorporates by reference all parallel portions of the '780, '654, '985, '970, and '895 Patents' specification as if expressly cited herein.

⁶⁴ Firman's Citations to patent figures includes the figure it expressly identifies by number, as well as all textual discussions of that figure within the relevant patent's written description.

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Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
			<p>light of the specification and claim language. Dr. Singhose is also expected to testify as to the plain and ordinary meaning of the terms “coupling” and “couple.”</p> <p>Dr. Singhose is also expected to respond to any proposed construction of the term other than in accord with its plain and ordinary meaning.</p> <p>Champion may also use any materials referenced by Firman.</p>		<p>at 2-6 (detailed action); Response (Nov. 3, 2017) at 8-16 (remarks); Non-Final Rejection (Feb. 22, 2018) at 2-12 (detailed action); Response (May 15, 2018) at 8-14 (remarks); Final Rejection (Sep. 5, 2018) at 2 (detailed action); Amendment/Response (Nov. 5, 2011) at 2-5 (claims), 6-8 (remarks); Notice of Allowability (Dec. 11-2018) at 2-3 (detailed action);</p> <p>The '654 Patent's Prosecution: Application (Nov. 15, 2018) at 20-24 (claims); Non-Final Rejection (Mar. 11, 2019) at 2-7 (detailed action); Amendment/Response (May 22, 2022) at 2 (title), 3 (abstract), 4-8</p>

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Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					(claims), 9-14 (remarks); Final Rejection (Aug. 30,2019) at 2-8 (detailed action); Amendment/Response (Oct. 30, 2019) at 2-6 (claims), 7-13 (remarks); Advisory Action (Dec. 5, 2019) at 2; Appeal Brief (Feb. 28, 2020) at 1-19; Non-Final Rejection (Apr. 30, 2020) at 2-9 (detailed action); Amendment/Response (July 16, 2020) at 2-6 (claims), 7-13 (remarks); Final Rejection (Oct. 28, 2020) at 2-12 (detailed action); Amendment/Response (Nov. 25, 2020) at 7-15 (remarks); Advisory Action (Dec. 7, 2020) at 2-8; Appeal Brief (Mar. 29, 2021) at 1-14; Examiner's Second Answer (Sep. 7, 2021) at

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Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>3-18; Reply Brief (Nov. 2, 2021) at 13; Board Decision (July 11, 2022) at 1-13; Amendment/Response (Aug. 11, 2022) at 2-5 (claims), 6 (remarks); Terminal Disclaimer (Sep. 8, 2022) at 1; Interview Summary (Sep. 14, 2022) at 1; Notice of Allowability (Oct. 5, 2022) at 2 (detailed action);</p> <p>The '985 Patent's Prosecution: Application (Feb. 6, 2020) at 20-24 (claims); Non-Final Rejection (July 27, 2020) at 2-9 (detailed action); Amendment/Response (Oct. 22, 2020) at 6-8 (remarks); Final Rejection (Feb. 1, 2021) at 2-10 (detailed action); Amendment/Response</p>

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Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support ¹	Firman's Proposed Construction	Firman's Support
					<p>(Mar. 31, 2021) at 5 (claims), 6-12 (remarks); Advisory Action (Apr. 16, 2021) at 2-5; Appeal Brief (July 6, 2021) at 1-19; Examiner's Answer (Aug. 13, 2021) at 3-23; Reply Brief (Oct. 13, 2021) at 1-18; Board Decision (Apr. 14, 2022) at 1-8; Amendment/Response (May 10, 2022) at 3 (claims), 6 (remarks); Notice of Allowability (July 7, 2022) at 2 (detailed action); Notice of Allowability (July 27, 2022) at 2 (detailed action); Comments on Reason for Allowance (Oct. 5, 2022) at 2;</p> <p>The '970 Patent's Prosecution: Application (Sep. 30, 2022) at 22-33 (claims); Non-Final</p>

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Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					<p>Rejection (Mar. 1, 2023) at 2-8 (detailed action); Amendment/Response (June 1, 2023) at 7 (claims), 14-21 (remarks); Terminal Disclaimer (Sep. 14, 2023) at 1; Final Rejection (Sep. 14, 2023) at 2-3 (detailed action); Amendment/Response (Sep. 14, 2023) at 14 (remarks); Notice of Allowability (Sep. 27, 2023) at 2 (detailed action); Comments on Reason for Allowance (Oct. 31, 2023) at 2;</p> <p>The '895 Patent's Prosecution: Application (Mar. 14, 2023) at 20-25 (claims); Non-Final Rejection (Sep. 28, 2023) at 2-3 (detailed action); Terminal Disclaimer (Dec. 1, 2023) at 1-2;</p>

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Claim Term	Applicable Patent(s)	Champion's Proposed Construction	Champion's Support¹	Firman's Proposed Construction	Firman's Support
					<p>Notice of Allowability (Dec. 21, 2023) at 2 (detailed action);</p> <p>Plaintiff's Infringement Contentions for the '780, '654, '985, '970, and '895 Patents.</p> <p>Plaintiff's Claim Charts for the '780,⁶⁵ and '895⁶⁶ Patents</p>
coupled to	10,393,034 [1, 18] 11,840,970 [44]	plain and ordinary meaning; alternatively, arranged in a way to perform a desired action, <i>e.g.</i> , to "open and close a gaseous fuel source to the engine"	'034 patent col. 5 ln. 13:29, col. 12 ln.45:53, FIGS. 1:3; '970 patent col. 3 ln. 35:51, col. 7 ln. 47:63, col. 12 ln. 63:col. 13 ln. 11, FIGS. 1:6 Dr. Singhose is expected to testify that a person having ordinary skill in the art would accord this term	indefinite	The '034 Patent, claims 1, 11, 14-15, 18-24; Dr. Jacobs may provide testimony explaining that the use of this claim term (read in light of the specification delineating the patent, and the prosecution history) fails to inform, with

⁶⁵ CPN010058, CPN010069, CPN010080, CPN010091, CPN010102,

⁶⁶ CPN010268, CPN010275, CPN010282, CPN010289, CPN010296,

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Claim Term	Applicable Patent(s)	Champion’s Proposed Construction	Champion’s Support¹	Firman’s Proposed Construction	Firman’s Support
			<p>its plain and ordinary meaning consistent with and understood in light of the specification and claim language, which includes arranged in a way to perform a desired action. Dr. Singhose is also expected to testify consistent with his testimony regarding the term “coupled.”</p> <p>Dr. Singhose is also expected to respond to any proposed construction of the term other than in accord with its plain and ordinary meaning.</p> <p>Champion may also use any materials referenced by Firman.</p>		<p>reasonable certainty, those skilled in the art about the scope of the invention.</p>