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To: ["Jenike-Godshalk, Jesse"; Al-Salam, Ramsey M. \(SEA\); Salmon, Dorianne \(SEA\)](#)
Cc: [TH-Caption-GEHC-NDCA](#)
Subject: RE: UBC v. Caption Health -- Defendants" Supplemental Preliminary Claim Constructions
Date: Friday, September 19, 2025 5:15:17 PM
Attachments: [image001.png](#)
[image002.png](#)

Counsel,

Pursuant to Patent Local Rule 4-2 and Judge Lee’s Modified Scheduling Order (Dkt. 82), UBC provides below its preliminary claim constructions of additional claim terms the parties have identified and exemplary evidence on which UBC may rely. This disclosure is provided based on information currently available to UBC. UBC reserves the right to supplement and/or amend this disclosure by adding, removing, or modifying the proposed terms, construction, and related support as the case proceeds, including after Defendants provide its proposed preliminary constructions and support and as the parties meet and confer as part of the claim construction process.

Claim Term	UBC’s Preliminary Proposed Construction	Support
<p><i>“each of the plurality of predetermined echocardiographic image view categories is associated with a respective set of assessment parameters, each of the sets of assessment parameters being a set of neural network parameters that define a neural network having a plurality of layers”</i> ('591 patent, claims 1, 11, and 15)</p>	<p>Plain and ordinary meaning / no construction required.</p>	<p>Intrinsic Evidence: See e.g., '591 patent (UBC_CAPTION_00001187-1230) at abstract, 2:13-18, 2:59-65, 3:45-55, 3:64-4:9, 4:15-26, 4:34-43, 5:67-6:6, 8:53-10:61, 11:34-14:49, 18:27-62, 20:55-63, 21:47-23:7, Figs. 2-5, 8-11, 14-16, claims 1, 11, and 15. '591 File History (UBC_CAPTION_00000233-1177), 10/22/2018 Appl., 3/15/2019 Prelim. Amdt., 5/5/2021 Office Action, 8/5/2021 Applicant Resp., 8/18/2021 Notice of Allowance.</p>
<p><i>“extracted feature representations”</i> ('029 patent, claims 1, 3-5, 7, 9-10, 14, 19, 21, 26-28, 30)</p>	<p>Feature representations that are learned using a neural network</p>	<p>Intrinsic Evidence: See e.g., '029 patent (UBC_CAPTION_00002175-2204) at abstract, 1:51-2:7, 2:51-57, 2:67-3:23, 4:9-30, 4:40-46, 6:33-41, 9:64-12:51, 16:1-8, Figs. 1-7, 11-12, claims 1, 3-5, 7, 9-10, 14, 19, 21, 26-28, 30. '029 File History (UBC_CAPTION_00002214-2956), 8/30/2019 Appl., 1/8/2020 Office Action, 3/19/2020 Applicant Resp., 6/25/2020 Notice of Allowance.</p>

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All,

I've attached Defendants' Supplemental Preliminary Claim Constructions.

Best,
Jesse

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