

THOMPSON HINE LLP
Marla R. Butler, *pro hac vice*
marla.butler@thompsonhine.com
Two Alliance Center
3560 Lenox Road NE, Suite 1600
Atlanta, GA 30326
Telephone: (404) 407-3680

Jeffrey C. Metzcar, *pro hac vice*
jeff.metzcar@thompsonhine.com
10050 Innovation Dr., #400
Miamisburg, OH 45342
Telephone: (937) 443-6841

Jesse L. Jenike-Godshalk, *pro hac vice*
jesse.jenike-godshalk@thompsonhine.com
312 Walnut Street, Suite 2000
Cincinnati, OH 45202
Telephone: (513) 352-6702

Andrew Himebaugh, *pro hac vice*
andy.himebaugh@thompsonhine.com
20 N. Clark Street, Suite 3200
Chicago, IL 60602
Telephone: (312) 998-4247

TURNER BOYD SERAPHINE LLP
Jennifer Seraphine, Bar No. 245463
seraphine@turnerboyd.com
Vyson Hsu, Bar No. 322336
hsu@turnerboyd.com
155 Bovet Road, Suite 750
San Mateo, CA 94402
Telephone: (650) 521-5930
Facsimile: (650) 521-5931

*Attorneys for Defendants/Counterclaim-
Plaintiffs Caption Health, Inc. & GE
HealthCare Technologies, Inc.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

UNIVERSITY OF BRITISH COLUMBIA,

Plaintiff/Counterclaim-
Defendant,

v.

CAPTION HEALTH, INC.
GE HEALTHCARE TECHNOLOGIES INC.

Defendants/Counterclaim-
Plaintiffs.

Case No. 3:24-cv-3200

**DEFENDANTS'
SUPPLEMENTAL
PRELIMINARY CLAIM
CONSTRUCTIONS PURSUANT
TO PATENT L.R. 4-2**

In accordance with Patent Local Rule 4-2 and the Court's Scheduling Order (Dkt. 82), Defendants Caption Health, Inc. and GE HealthCare Technologies, Inc. (collectively, "Defendants" or "GEHC") propose the following claim constructions for the claim terms and phrases presently identified by the parties.

Defendants reserve the right to amend or revise these preliminary constructions based on Plaintiff's disclosure of proposed preliminary claim constructions and/or additional information learned through investigation or discovery. Defendants further reserve the right to supplement

their supporting citations, whether to account for revised constructions or to rebut Plaintiff's proposed constructions and supporting citations.

Defendants' inclusion of a proposed construction below does not constitute an admission that such term, phrase, or clause is amenable to construction, definite, or enabled (as may impact any argument as to validity under 35 U.S.C. §§ 101, 102, 103, and 112). Additionally, parenthetical quotations in the chart below should not be construed as limiting in relation to the full citation within which the quotation appears.

Defendants' Proposed Claim Constructions

Term	Proposed Construction and [Support]
<p>quality assessment value</p> <p><i>('591 patent, claims 1–3, 5, 7–17, 19)</i></p> <p><i>('029 patent, claims 1, 9-14, 21, 27-30)</i></p>	<p>score of diagnostic image quality</p> <p>['591 patent: 5:30-45, 5:62-67, 6:17-20, 14:50-15:54, 20:25-35, Fig. 12 (424), Fig. 13 (442), Fig. 18 (784), claim 2]</p> <p>['029 patent: 5:5-22, 5:38-39, 6:52-55, 7:7-14, 7:15-32, 16:50-58]</p>
<p>determining that a [first/second] set of assessment parameters of the sets of assessment parameters is associated with the [first/second] view category</p> <p><i>('591 patent, claims 1, 11, 15)</i></p>	<p>determining which of the respective sets of assessments parameters is associated with the [first/second] view category</p> <p>['591 patent: Fig. 2 (142, 146), Fig. 7 (302), Fig. 10 (342), Fig. 11 (402), 8:43-52, 8:57-65, 9:16-18, 10:47-51, 10:62-11:23, 11:34-44, 11:52-59, 13:26-37, 13:48-52, 13:62-14:26, 34:42-46]</p> <p>[Prosecution History of the '591 patent: UBC_CAPTION_00001133-1138]</p>
<p>in response to determining that the [first/second] set of assessment parameters is associated with the [first/second] view category, inputting the [first/second] at least one echocardiographic image into the neural network defined by the [first/second] set of assessment parameters</p> <p><i>('591 patent, claims 1, 11, 15)</i></p>	<p>in response to determining that the [first/second] set of assessment parameters is associated with the [first/second] view category, inputting the [first/second] at least one echocardiographic image into the respective neural network defined by the [first/second] set of assessment parameters</p> <p>['591 patent: Fig. 2 (146), Fig. 8 (374), Fig. 10 (340, 342), Fig. 11 (404) 13:5-37, 13:44-52, 14:27-49]</p> <p>[Prosecution History of the '591 patent: UBC_CAPTION_00001133-1138]</p>
<p>each of the plurality of predetermined echocardiographic image view categories is</p>	<p>each of the plurality of predetermined echocardiographic image view categories is</p>

<p>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</p> <p>(<i>'591 patent, claims 1, 11, 15</i>)</p>	<p>associated with a respective set of assessment parameters, each of the sets of the assessment parameters being a set of neural network parameters that define a respective view-category-specific neural network</p> <p>[<i>'591 patent: 6:13-16, 8:53-65, 8:66-9:16, 9:16-18, 11:34-45, 11:52-59, 12:7-21, 12:31-41, 13:26-37, 13:48-52, 13:67-14:37, 14:43-49, 24:1-9, Fig. 8 (364, 370, 372, 374, 376, 378), Fig. 10 (“View category specific neural network record”), Fig. 16 (706 (“train the plurality of neural networks”))</i>]</p> <p>[Prosecution History of the <i>'591 patent: UBC_CAPTION_00001133-1138 (“utilizing respective neural networks”) (“into a respective neural network”) (“Each neural network is defined by a respective set of assessment parameters associated with one of a plurality of predetermined view categories”) (“neural networks defined by the first and second set of assessment parameters, respectively”) (“using two respective neural networks corresponding to the respective view category”) (“the claimed use of a first neural network defined by a first set of assessment parameters ... and use of a second neural network defined by a second set of assessment parameters ..., wherein the assessment parameters defining each network are associated with a view category”)]</i></p> <p>[<i>UBC’s Discretionary Denial Brief, IPR2025-01066, Paper No. 7 at 6-7 (“view-category-specific neural networks as recited in limitations [1(i)/(I)]”), 13.</i>]</p>
<p>one or more extracted feature representations</p> <p>(<i>'029 patent, claims 1, 3, 4, 5, 7, 9, 10, 14, 19, 21, 26, 27, 28, 30</i>)</p>	<p>data representing extracted features</p> <p>[<i>'029 patent: 1:55-59, 1:66-2:5, 2:51-65, 6:35-41, 10:9-16, 10:40-11:12, 11:30-42, 11:51-60, 12:28-31, 12:42-48, 13:34-36, 23:4-26</i>]</p>

THOMPSON HINE LLP

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/s/ Marla R. Butler

Marla R. Butler, *pro hac vice*
marla.butler@thompsonhine.com
Two Alliance Center
3560 Lenox Road Suite 1600
Atlanta, Georgia 30326-4266
Telephone: (404) 407-3680

Jeffrey C. Metzcar, *pro hac vice*
jeff.metzcar@thompsonhine.com
10050 Innovation Dr., #400
Miamisburg, OH 45342
Telephone: (937) 443-6841

Jesse L. Jenike-Godshalk, *pro hac vice*
jesse.jenike-godshalk@thompsonhine.com
312 Walnut Street, Suite 2000
Cincinnati, OH 45202
Telephone: (513) 352-6702

Andrew Himebaugh, *pro hac vice*
andy.himebaugh@thompsonhine.com
20 N. Clark Street, Suite 3200
Chicago, IL 60602
Telephone: (312) 998-4247

Jennifer Seraphine (State Bar No. 245463)
seraphine@turnerboyd.com
Vyson Hsu (State Bar No. 322336)
hsu@turnerboyd.com
TURNER BOYD SERAPHINE LLP
155 Bovet Road, Suite 750
San Mateo, CA 94402
Telephone: (650) 521-5930

*Attorneys for Defendants/Counterclaim-Plaintiffs
Caption Health, Inc. & GE HealthCare
Technologies Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on September 19, 2025, a true and correct copy of the foregoing document was transmitted via electronic mail addressed to:

<p>Ramsey M. Al-Salam, Bar No. 109506 RAlsalam@perkinscoie.com Dorianne Salmon, pro hac vice forthcoming DSalmon@perkinscoie.com PERKINS COIE LLP 1201 Third Avenue, Suite 4900 Seattle, Washington 98101-3099 Telephone: +1.206.359.8000</p> <p>Moeka Takagi, Bar No. 333226 MTakagi@perkinscoie.com PERKINS COIE LLP 3150 Porter Drive Palo Alto, California 94304-1212 Telephone: +1.650.838.4300</p>	<p><i>Attorneys for Plaintiff University of British Columbia</i></p>
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/s/ Jesse Jenike-Godshalk
Jesse Jenike-Godshalk