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18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN JOSE DIVISION

22 University of British Columbia,

23 Plaintiff,

24 v.

25 Caption Health, Inc.; GE HealthCare
26 Technologies, Inc.,

27 Defendants.

Case No. 5:24-cv-03200-EKL

AMENDED/SUPPLEMENTAL JOINT
CLAIM CONSTRUCTION AND
PREHEARING STATEMENT PURSUANT
TO PATENT LOCAL RULE 4-3

Judge: Eumi K. Lee

Pursuant to Patent L.R. 4-3 and the Court’s Modified Scheduling Order (Dkt. 82), plaintiff University of British Columbia (“UBC” or “Plaintiff”) and defendants Caption Health, Inc. and GE HealthCare Technologies, Inc. (“Defendants”) (collectively, the “Parties”) jointly submit this Amended/Supplemental Joint Claim Construction and Prehearing Statement regarding U.S. Patent Nos. 11,129,591 (the “’591 patent”) and 10,751,029 (the “’029 patent”), which are attached as Exhibits A and B hereto.

I. Proposed Claim Constructions and Supporting Evidence

A. Construction of Terms on Which the Parties Agree

Pursuant to Patent L.R. 4-3(a), the Parties identify the following terms and corresponding constructions on which the Parties agree:

<p>“means for receiving signals representing a set of ultrasound images of the subject” (’029 patent, claim 30)</p>	<p><u>Function</u>: receiving signals representing a set of ultrasound images of the subject <u>Corresponding structure that performs the function</u>: a processor with I/O interface</p>
<p>“means for deriving one or more extracted feature representations from the set of ultrasound images” (’029 patent, claim 30)</p>	<p><u>Function</u>: deriving one or more extracted feature representations from the set of ultrasound images <u>Corresponding structure that performs the function</u>: a processor and memory operating a neural network</p>
<p>“means for determining, based on the derived one or more extracted feature representations, a quality assessment value representing a quality assessment of the set of ultrasound images” (’029 patent, claim 30)</p>	<p><u>Function</u>: determining, based on the derived one or more extracted feature representations, a quality assessment value representing a quality assessment of the set of ultrasound images <u>Corresponding structure that performs the function</u>: a processor and memory operating a neural network</p>
<p>“means for determining, based on the derived one or more extracted feature representations, an image property associated with the set of ultrasound images” (’029 patent, claim 30)</p>	<p><u>Function</u>: determining, based on the derived one or more extracted feature representations, an image property associated with the set of ultrasound images</p>

	<p><u>Corresponding structure that performs the function:</u> a processor and memory operating a neural network</p>
<p>“means for producing signals representing the quality assessment value and the image property for causing the quality assessment value and the image property to be associated with the set of ultrasound images”</p>	<p><u>Function:</u> producing signals representing the quality assessment value and the image property for causing the quality assessment value and the image property to be associated with the set of ultrasound images</p>
<p>(’029 patent, claim 30)</p>	<p><u>Corresponding structure that performs the function:</u> a processor and memory</p>

A. Proposed Constructions of Disputed Terms

Pursuant to Patent L.R. 4-3(b), the Parties attach Exhibit C, which sets forth each Party’s proposed construction of each disputed term and identifies any intrinsic and/or extrinsic evidence known to each Party, respectively, on which the Party intends to rely.

Since the initial Joint Claim Construction and Prehearing Statement (Dkt. 68) was filed, the parties have proposed two additional terms for construction: “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” and “extracted feature representations.” The parties have also mutually agreed to withdraw two terms¹ to streamline the claim construction process.

B. Identification of Significant Terms

Pursuant to Patent L.R. 4-3(c) and Sec. III.A. of the Court’s Patent Standing Order, the Parties identify the terms listed below as most significant to resolution of the case. Plaintiff does not believe any particular term is case dispositive; all terms other than “quality assessment value” and “extracted feature representations” were identified by Defendants for construction. Defendants believe that the “determining” and “each of the plurality of predetermined echocardiographic image

¹ Ex. C no longer identifies the terms “a set of common [assessment/neural network] parameters, which are common to each of the sets of [assessment/neural network] parameters” and “clinical plane assessment value.”

1 view categories” terms, if construed as Defendants have proposed, will be dispositive with respect
2 to alleged infringement of the ’591 patent.

3 1. “quality assessment value” (’591 patent, claims 1-3, 5, 7-17, 19; ’029 patent, claims 1, 9-
4 14, 21, 27-30)

5 2. “determining that a [first/second] set of assessment parameters of the sets of assessment
6 parameters is associated with the [first/second] view category” (’591 patent, claims 1, 11, 15)

7 3. “in response to determining that the [first/second] set of assessment parameters is
8 associated with the [first/second] view category, inputting the [first/second] at least one
9 echocardiographic image into the neural network defined by the [first/second] set of assessment
10 parameters” (’591 patent, claims 1, 11, 15)

11 4. “each of the plurality of predetermined echocardiographic image view categories is
12 associated with a respective set of assessment parameters, each of the sets of assessment parameters
13 being a set of neural network parameters that define a neural network having a plurality of layers”
14 (’591 patent, claims 1, 11, 15)

15 5. “extracted feature representations” (’029 patent, claims 1, 3-5, 7, 9-10, 14, 19, 21, 26-28,
16 30)

17 **II. Anticipated Length of Time for Claim Construction Hearing**

18 The Parties respectively request three (3) hours, with time split evenly between the sides.

19 **III. Witnesses**

20 The Parties do not anticipate the need to call any witnesses at the Claim Construction
21 Hearing.

22 **IV. Factual Findings**

23 The Parties do not request any factual findings related to claim construction from the Court.
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Dated: October 10, 2025

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ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that all signatories to this document
concur in its filing.

Dated: October 10, 2025

/s/ Ramsey M. Al-Salam
Ramsey M. Al-Salam