

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BECKMAN COULTER, INC.,)
)
 Plaintiff,)
)
 v.) C.A. No. 24-945 (CFC) (EGT)
)
 CYTEK BIOSCIENCES, INC.,)
)
 Defendant.)

JOINT CLAIM CONSTRUCTION CHART

Pursuant to Paragraph 15 of the Court’s Scheduling Order (D.I. 25), Plaintiff Beckman Coulter, Inc. and Defendant Cytek Biosciences, Inc. respectfully submit their Joint Claim Construction Chart identifying for the Court the terms/phrases of the asserted claims of U.S. Patent No. 10,330,582 (“582 Patent”), 11,703,443 (“443 Patent”), 12,174,106 (“106 Patent”), and 12,174,107 (“107 Patent”) (the “Asserted Patents”) for which the parties seek construction, as well as each party’s proposed construction of the disputed claim language with citations only to the intrinsic evidence in support of their respective proposed constructions. (*See Exhibit A.*)¹

¹ Cytek Position: Cytek identified additional terms in its May 14, 2025 Identification of Claim Construction Issues and Proposed Constructions, including terms Cytek considers indefinite, that it has reserved for later resolution, if necessary, including consistent with Cytek’s understanding of the Court’s preference for hearing indefiniteness challenges at a later stage of the case. These additional terms are not included within Exhibit A.

Copies of the patents-in-suit are attached as Exhibits B through E.

- Exhibit B is U.S. Patent No. 10,330,582 (the “’582 Patent”)
- Exhibit C is U.S. Patent No. 11,703,443 (the “’443 Patent”)
- Exhibit D is U.S. Patent No. 12,174,106 (the “’106 Patent”)
- Exhibit E is U.S. Patent No. 12,174,107 (the “’107 Patent”)

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Dated: May 28, 2025

Beckman Coulter Position: Consistent with the Court’s practice, the parties agreed that only ten Cytek terms would be construed. Accordingly, Beckman Coulter disagrees that Cytek may properly reserve other claim construction arguments for later in the proceeding.

Exhibit A to Joint Claim Construction Chart

Agreed Constructions²

Claim Terms/Phrases	Construction ³
<p>Preambles</p> <p>“A wavelength division multiplexer (WDM) for a flow cytometer comprising” (’443 Patent, cls. 1, 2, 3, 4, 6, 7, 9, 10, 16, 18; ’106 Patent, cls. 1, 2, 13, 17; ’107 Patent, cls. 1, 5, 10, 16, 17, 26)</p> <p>“A flow cytometer comprising” (’443 Patent, cls. 11, 13, 15, 16, 17, 18; ’106 Patent, cls. 1, 2, 10, 11, 13, 14, 17; ’107 Patent, cls. 1, 3, 5, 7, 9-12, 14, 16-18, 26, 27, 29, 30; ’582 Patent, cls. 1, 20)</p> <p>“An optical subsystem for a flow cytometer, the optical subsystem comprising” (’582 Patent, cls. 1, 2, 3, 6, 14, 15, 17, 18, 20, 21, 22, 23, 25, 26)</p>	<p>Preambles are limiting.</p>

² The Parties respectfully request, to the extent the Court deems appropriate, that the Court include the parties’ agreed-upon claim constructions in its Claim Construction Order.

³ The parties agree that the preambles are limiting.

Cytek Position: Additionally, Cytek had proposed constructions for these terms and reserves its right to pursue these constructions, including to raise potential disputes related to the scope of these terms for resolution if necessary.

Exhibit A to Joint Claim Construction Chart

Disputed Claim Terms^{4,5,6}

Claim Term(s)	Patent No./Claim No(s).	Plaintiff’s Proposed Construction	Plaintiff’s Intrinsic Evidence	Defendant’s Proposed Construction	Defendant’s Intrinsic Evidence
“first” / “second”	’582 Patent, cls. 1, 3, 6, 14, 15, 17, 18, 20, 21, 22, 25, 26; ’106 Patent, cl. 1;	No construction necessary; plain and ordinary meaning.	’582 Patent, Abstract; 3:37-48; 4:2-33; 4:34-60; 4:61-5:22; 5:23-46; 5:47-	First: “initial [curved mirror / focusing optical element / filter/ optical filter /	’582 Patent, 44:58-61; 45:4-15; 45:32-38; 46:17-26; 46:36-42; FIG. 25

Beckman Coulter Position: As explained above, consistent with the Court’s practice, the parties agreed that only ten Cytek terms would be construed. Beckman Coulter therefore disagrees that Cytek may properly reserve other claim construction arguments for later in the proceeding.

⁴ The Asserted Patents share a common specification. Where the parties identify intrinsic citations within the ’582 Patent specification, it is understood that the parties are also identifying parallel disclosures in the specifications for the ’443, ’106, and ’107 Patents.

⁵ All Beckman Coulter citations referencing a figure or table incorporate by reference that figure or table. Beckman Coulter reserves the right to rely on any intrinsic evidence identified and/or relied upon by Cytek. Beckman Coulter reserves the right to amend, supplement, or modify its proposed constructions and intrinsic evidence, including to rely upon additional intrinsic evidence in its claim construction briefing.

⁶ Cytek reserves the right to rely on any intrinsic evidence identified and/or relied upon by Beckman Coulter. Cytek further reserves its right to supplement the attached Joint Claim Construction Chart with additional intrinsic evidence and to rely upon additional intrinsic evidence in its claim construction briefing.

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
	'443 Patent, cls. 9, 10	<i>That is:</i> An element or limitation as distinguished from another instance of the element or limitation; “first” and “second” are used to distinguish between repeated instances of an element or limitation	65; 6:7-25; 6:26-56; 6:57-7:9; 7:10-27; 7:28-38; 7:45-56; 8:12-34; 9:10-65; 11:33-37; 11:39-43; 11:44-48; 11:49-52; 14:41-54; 15:56-67; 17:15-20;17:29-33; 17:34-38;17:39-43; 17:44-48; 17:51-61; 21:40-48; 21:58-67; 26:51-55; 32:39-49; 37:34-41; 37:65-38:32; 45:16-43; 45:55-46:5; 48:40-51; 50:15-31; 50:32-41; 50:48-59; 50:60-67; 51:1-9; 51:19-25; 51:45-57; 53:31-	dichroic filter / semiconductor detector / image] in the optical path through the WDM,” otherwise indefinite. Second: “second sequential [filter / focusing optical element / semiconductor detector] after an initial [filter / focusing optical element / semiconductor detector / image] in the optical path through the WDM,” otherwise indefinite.	

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			41; 53:51-54; 54:3-11; 55:34-46; 57:4-19; 57:39-48; 58:20-47; FIG. 25 '582 Patent, cls. 1, 3, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 24, 25, 26 '443 Patent, cls 9, 10, 14, 15, 19, 20 '106 Patent, cls. 1, 3, 4, 5, 6, 11, 12, 18, 19 '107 Patent, cls. 10, 26 '582 Patent FH, Amendment to the Claims (06-30-2017);		

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			<p>Claims (November 29, 2018); Applicant Arguments/Remarks Made in Amendment (Nov. 29, 2018); Notice of Allowance and Fees Due (Feb. 9, 2019)</p> <p>'443 Patent FH, Claims (Nov. 4, 2022)</p> <p>'412 Patent FH, Claims (Nov. 26, 2014); Claims (June 3, 2016); Applicant Arguments/Remarks Made in Amendment (June 3, 2016);</p>		

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			<p>Applicant Arguments/Remarks Made in an Amendment (Oct. 27, 2016);</p> <p>'106 Patent FH, Claims (Dec. 22, 2021); Claims (April 9, 2024); Claims (June 4, 2024); Claims (July 18, 2024); Claims (August 30, 2024)</p> <p>Application No. 61/715,819 at [0007], [0008], [0016]</p>		

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff’s Proposed Construction	Plaintiff’s Intrinsic Evidence	Defendant’s Proposed Construction	Defendant’s Intrinsic Evidence
“collimating”/ ”collimate”	’582 Patent, cls. 1, 14, 20; ’106 Patent, cls. 1, 13, 17	No construction necessary; plain and ordinary meaning <i>That is:</i> rendering / render rays of light more nearly parallel	’582 Patent, Abstract; 2:26-29; 2:59-61; 4:34-5:22; 6:26-56; 8:56-9:10; 9:51-65; 10:20-23; 12:62-13:26; 13:41-44; 13:45-14:11; 14:35-40; 20:18-33; 20:62-21:11; 21:40-48; 22:24-46; 26:7-9; 27:9-21; 28:15-35; 28:49-65; 28:66-29:25; 29:26-52; 29:53-30:4; 35:14-35:35; 36:16-32; 43:30-42; 44:1-34; 44:35-57;	Indefinite. ⁷ If not indefinite, should be construed as “make rays of light within a beam that originate from a point source parallel to each other and not converging (i.e., focused) or diverging”	’582 Patent, Abstract; 2:26-29; 4:34-53; 6:39-50; 20:18-33; 20:62-21:11; 44:20-22; 44:28-41; 44:58-63; 44:66-45:4; 45:49-51; 45:22-29; FIGs. 25, 27, 28 ’582 Patent File History, Nonprovisional Application No. 15/638,461, cls. 1, 162, 168, 207, 244, 266, 301

⁷Cytek recognizes the Court’s practice to defer a determination on indefiniteness until after claim construction proceedings and, consistent with that practice, Cytek is not requesting that the Court make an indefiniteness determination at this time.

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			44:58-45:7; 45:8-15; 45:16-43; 45:44-54; 45:55-46:5; 46:6-29; 46:51-59; 46:60-47:7; 49:16-46; 56:5-31; 57:47-55; FIGs. 25, 26, 27, 28 '582 Patent, Claims 1, 3-14, 16-21, 24 '443 Patent, Claims 8, 10, 20 '106 Patent, 1, 7, 12, 13, 16, 18 '412 Patent FH, Claims (Nov. 26, 2014); Claims (June 3, 2016); Applicant Arguments/Rem		Provisional Application No. 61/715,819 (filed October 18, 2012), [0006]; [0007]; [0016]; FIGs. 1, 4; cls. 1, 7 '412 Patent File History, October 27, 2016 Applicant Reply to Office Action of June 27, 2016

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			<p>arks Made in Amendment (June 3, 2016); Applicant Arguments/Remarks Made in an Amendment (Oct. 27, 2016)</p> <p>'582 Patent FH, Amendment to the Claims (06-30-2017); Claims (Nov. 29, 2018); Applicant Arguments/Remarks Made in Amendment (Nov. 29, 2018); Notice of Allowance and Fees Due (Feb. 9, 2019)</p>		

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			<p>'443 Patent FH, Claims (Nov. 4, 2022)</p> <p>'106 Patent FH, Claims (Dec. 22, 2021); Claims (April 9, 2024); Claims (June 4, 2024); Claims (July 18, 2024); Claims (August 30, 2024); Examiner Interview Summary Record (May 24, 2024); Applicant Arguments/Remarks Made in Amendment (July 19, 2024); Applicant Arguments/Remarks Made in</p>		

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			<p>Amendment (June 10, 2024); Applicant Arguments/Remarks Made in an Amendment (July 18, 2024); Notice of Allowance (Sept. 11, 2024)</p> <p>Application No. 61/715,819 at FIG. 2, [0004], [0005], [0006], [0007], [0009], [0011], [00016], [00017]</p> <p><i>See also evidence for “collimated beam” and “collimating optical element”</i></p>		

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
“collimated beam”	'443 Patent, cl. 10; '582 Patent, cls. 1, 3, 6, 14, 17, 18	No construction necessary; plain and ordinary meaning. <i>That is:</i> a beam with nearly parallel rays	'582 Patent, Abstract; 2:26-29; 2:59-61; 4:34-5:22; 6:26-56; 8:56-9:10; 9:51-65; 10:20-23; 12:62-13:26; 13:41-44; 13:45-14:11; 14:35-40; 20:18-33; 20:62-21:11; 21:40-48; 22:24-46; 26:7-9; 27:9-21; 28:15-35; 28:49-65; 28:66-29:25; 29:26-52; 29:53-30:4; 35:14-35:35; 36:16-32; 43:30-42; 44:1-34; 44:35-57; 44:58-45:7; 45:8-15; 45:16-43; 45:44-54;	Indefinite. If not indefinite, should be construed as “a beam wherein all rays of light originating from a point source are projected parallel with each other and the rays within the beam are neither converging (i.e., a focused beam) or diverging”	'582 Patent, Abstract; 2:26-29; 4:34-53; 6:39-50; 9:51-65; 20:18-33; 25:65-67; 26:10-17; 20:62-21:11; 44:58-63, 44:66-45:4; 45:22-29; 45:49-51; FIGs. 25, 27, 28 '582 Patent File History, Nonprovisional Application No. 15/638,461, cls. 1, 162, 168, 207, 244, 266, 301 Provisional Application No. 61/715,819

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			45:55-46:5; 46:6-29; 46:51-59; 46:60-47:7; 49:16-46; 56:5-31; 57:47-55; FIGs. 25, 26, 27, 28 '582 Patent, Claims 1, 3-14, 16-21, 24 '443 Patent, Claims 8, 10, 20 '106 Patent, 1, 7, 12, 13, 16, 18 '412 Patent FH, Claims (Nov. 26, 2014); Claims (June 3, 2016); Applicant Arguments/Remarks Made in Amendment (June 3, 2016);		(filed October 18, 2012), [0006]; [0007]; [0016]; FIGs. 1, 4; cls. 1, 7 '412 Patent File History, October 27, 2016 Applicant Reply to Office Action of June 27, 2016

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			<p>Applicant Arguments/Remarks Made in an Amendment (Oct. 27, 2016)</p> <p>'582 Patent FH, Amendment to the Claims (06-30-2017); Claims (11/29/2018); Applicant Arguments/Remarks Made in Amendment (Nov. 29, 2018); Notice of Allowance and Fees Due (Feb. 9, 2019)</p> <p>'443 Patent FH, Claims (Nov. 4, 2022)</p>		

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			'106 Patent FH, Claims (Dec. 22, 2021); Claims (April 9, 2024); Claims (June 4, 2024); Claims (July 18, 2024); Claims (August 30, 2024); Examiner Interview Summary Record (May 24, 2024); Applicant Arguments/Remarks Made in Amendment (July 19, 2024); Applicant Arguments/Remarks Made in Amendment (June 10, 2024); Applicant		

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			<p>Arguments/Remarks Made in an Amendment (July 18, 2024); Notice of Allowance (Sept. 11, 2024)</p> <p>Application No. 61/715,819 at Fig. 2, [0004], [0005], [0006], [0007], [0009], [0011], [00016], [00017]</p> <p><i>See also evidence for “collimating”/“collimated” and “collimating optical element”</i></p>		

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
"image"	'582 Patent, cls. 1, 14, 15, 20, 21, 22, 25, 26	No construction necessary; plain and ordinary meaning. <i>That is:</i> representation of an object	'582 Patent, Abstract; 2:49-51; 4:34-60; 5:46-56; 6:26-56; 7:10-27; 8:12-34; 8-35-55; 9:51-65; 10:24-26; 12:35-39; 12:44-49; 14:55-57; 16:1-3; 20:18-33; 20:34-39; 20:44-49; 20:62-21:10; 21:11-17; 21:22-27; 21:40-48; 27:43-50; 28:6-8; 44:58-45:7; 45:16-43; 45:44-54; 45:60-65; 46:51-59; 47:21-25; 56:59-58:47 '582 Patent, Claims 1, 4, 12, 13, 14, 15, 16,	"a pictorial representation of an object (e.g., light source) where rays of light from points on the object are focused to a corresponding point by an optical component," otherwise indefinite.	

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			20, 21, 22, 23, 24, 25, 26 '106 Patent, claims 6, 7, 15, 16 '582 Patent, FH, Amendment to the Claims (06-30-2017); Claims (11/29/2018); Applicant Arguments/Remarks made in Amendment (Nov. 29, 2018); Notice of Allowance and Fees Due (Feb. 9, 2019) '412 Patent FH, Claims (Nov. 26, 2014); Claims		

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			(June 3, 2016); Applicant Arguments/Remarks Made in Amendment (June 3, 2016); Applicant Arguments/Remarks Made in Amendment (Oct. 27, 2016); Notice of Allowance and Fees Due (April 5, 2017) '106 Patent FH, Applicant Arguments/Remarks Made in an Amendment (July 18, 2024) '174 Patent FH, Applicant		

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			<p>Arguments/Remarks Made in an Amendment (July 23, 2018)</p> <p>Application No. 61/715,819 at [0004], [0007], [0016], [0017], [0018], cls. 2, 8</p>		
"optical element"	'443 Patent, cls. 13, 17, 18	<p>No construction necessary; plain and ordinary meaning.</p> <p><i>That is:</i> a component within an optical instrument or system which acts upon light passing through the instrument or system</p>	'582 Patent, Abstract; 2:7-11; 2:35-53; 3:7-36; 4:34-60; 4:61-65; 5:23-46; 5:47-65; 6:26-56; 7:3-9; 7:10-27; 7:28-38; 7:45-56; 7:57-8:11; 8:12-34; 8:35-9:65; 10:24-26; 10:31-36; 10:60-67; 11:4-9; 11:19-24; 12:35-39;	<p>Invokes 35 U.S.C. § 112, ¶ 6 / 35 U.S.C. § 112(f).</p> <p>'443 Patent, cl. 13:</p> <p>Function: detect scattered light emitted by the particle in the flow channel and illuminated by a light source.</p>	'582 Patent, Abstract; 2:41-43; 3:7-36; 5:47-65; 6:26-38; 6:59-66; 7:15-22; 7:32-38; 7:49-56; 7:57-8:11; 8:41-43; 9:10-24; 10:31-36; 10:60-64; 10:66-67; 11:4-9; 11:19-24; 14:41-54; 14:62-67; 15:9-18; 15:31-32; 15:36-

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
		<p><i>Alternatively, if means-plus-function:</i></p> <p>'443 Patent, cl. 13:</p> <p>Function: detect scattered light emitted by the particle in the flow channel and illuminated by a light source</p> <p>Structure: an objective and structural equivalents thereof</p> <p>'443 Patent, cl. 17:</p>	<p>12:40-43; 12:44-49; 12:57-61; 12:62-13:16; 13:41-44; 13:45-14:12; 14:35-40; 14:41-54; 14:55-57; 14:62-67; 15:9-18; 15:31-32; 15:36-41; 15:56-67; 16:8-14; 20:18-33; 20:34-39; 20:40-43; 20:57-61; 20:62-21:10; 21:11-17; 21:18-21; 21:22-27; 21:35-39; 21:40-48; 21:49-57; 22:24-46; 23:1-25; 23:46-50; 23:51-55; 23:56-59; 23:60-63; 24:8-14; 24:15-21; 24:22-24; 24:25-28; 24:29-</p>	<p>Structure: Indefinite.</p> <p>'443 Patent, cl. 17:</p> <p>Function: (1) detect scattered light emitted by the particle in the flow channel and illuminated by a light source; and (2) output, based on the detected scattered light, the light to the WDM via the optical fiber.</p> <p>Structure: Indefinite.</p>	<p>41; 15:56-67; 16:8-14; 21:51-57; 33:14-42; 34:15-17; 34:43-55; 35:14-36:55; 51:45-57; FIGs. 1, 8, 8A, 8B, 9A, 10, 11, 12, 13, 36</p> <p>'582 Patent File History, Nonprovisional Application No. 15/638,461, cl. 1, 187, 244, 263, 275, 285</p>

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
		<p>Function: (1) detect scattered light emitted by the particle in the flow channel and illuminated by a light source; (2) output, based on the detected scattered light, the light to the WDM via the optical fiber</p> <p>Structure: an objective and structural equivalents thereof</p> <p>'443 Patent, cl. 18:</p> <p>Function: detect scattered light</p>	<p>32; 24:33-36; 24:37-43; 24:44-51; 24:52-57; 24:58-61; 27:22-26; 27:59-28:14; 28:15-35; 28:66-29:25; 29:36-45; 29:53-30:4; 30:5-30; 30:31-45; 30:62-31:23; 31:24-44; 31:56-64; 32:6-22; 32:23-48; 32:49-33:42; 34:4-14; 34:15-42; 34:43-59; 35:18-35; 35:36-59; 35:60-36:32; 36:33-49; 43:31-67; 44:1-34; 44:53-67; 45:1-7; 45:8-15; 45:16-43; 45:44-54; 45:55-46:5; 46:6-29; 46:36-42; 46:51-59;</p>	<p>'443 Patent, cl. 18:</p> <p>Function: (1) detect scattered light emitted by the particle in the flow channel and illuminated by the one or more light sources and (2) output light to the WDM via the optical fiber.</p> <p>Structure: Indefinite.</p>	

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
		emitted by the particle in the flow channel and illuminated by one or more of the light sources Structure: an objective and structural equivalents thereof <i>See, e.g.,</i> '582 Patent, Abstract; 2:7-11; 2:41-43; 2:49-51;3:7-36; 5:47-6:6; 6:26-56; 7:3-9; 7:10-27; 7:28-38; 7:45-56; 7:57-8:65; 9:10-24; 10:24-26; 10:31-36; 10:60-67; 11:4-9; 11:19-	46:60-47:7; 47:8-25; 47:49-48:19; 48:20-51; 48:52-67; 49:8-46; 49:47-52; 50:15-31; 50:32-41; 50:48-51:9; 51:10-18; 51:19-25; 51:26-31; 51:32-44; 51:45-57; 51:58-52:4; 52:20-29; 52:30-34; 52:40-54; 53:19-22; 53:23-26; 53:31-41; 53:51-54:2; 54:12-56:56; 56:59-58:47; FIGs. 1, 8, 8A, 8B, 9A, 10, 11, 12, 13, 25, 27, 28, 36 '582 Patent, Claims 1, 3, 4, 5,		

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
		24; 14:41-54; 14:55-57; 14:62-67; 15:9-18; 15:31-32; 15:36-41; 15:56-67; 16:8-14; 21:49-57; 23:1-25; 23:46-50; 23:51-55; 23:56-59; 23:60-63; 24:8-14; 24:15-21; 24:22-24; 24:25-28; 24:29-32; 24:33-36; 24:37-43; 24:44-51; 24:52-57; 24:58-61; 27:59-28:13; 29:36-45; 31:18-23; 31:24-44; 31:56-64; 32:48-33; 34:4-14; 34:15-42; 34:43-59; 35:18-35; 35:36-59; 35:60-36; 43:31-42;	6, 7, 8, 9, 10, 11, 12, 13, 14, 16, 17, 18, 19, 20, 21, 24, 26 '443 Patent, Claims 4, 8, 13, 14, 16, 17, 18, 19, 20 '106 Patent, Claims 1, 2, 3, 7, 8, 9, 13, 14, 16, 18, 20 '582 Patent FH, Notice of Allowance and Fees Due (Feb. 7, 2019); Applicant Arguments/Remarks Made in an Amendment (Nov. 29, 2018);		

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
		44:53-67; 48:53-67; 49:8-46; 49:47-52; 51:32-44; 51:45-57; 51:58-52:4; 52:5-14; 53:42-50; 53:51-54:2; 54:12-56:56; 57:1-7; FIGs. 1, 8, 8A, 8B, 9A, 10, 11, 12, 13, 36	Amendment to the Claims (06-30-2017); Claims (11/29/2018); Applicant Arguments/Remarks made in Amendment (Nov. 29, 2018); '582 Patent FH, Notice of Allowance and Fees Due (Feb. 9, 2019) at 2-4 '443 Patent FH, Claims (Nov. 4, 2022) '412 Patent FH, Claims (Nov. 26, 2014); Claims (June 3, 2016); Applicant		

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			<p>Arguments/Remarks Made in Amendment (June 3, 2016); Applicant Arguments/Remarks Made in an Amendment (Oct. 27, 2016)</p> <p>'106 Patent FH, Claims (Dec. 22, 2021); Claims (April 9, 2024); Claims (June 4, 2024); Claims (July 18, 2024); Claims (August 30, 2024); Applicant Arguments/Remarks Made in Amendment (June 4, 2024); Applicant</p>		

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			<p>Arguments/Remarks Made in Amendment (July 18, 2024); Notice of Allowance (Sept. 11, 2024)</p> <p>'174 Patent FH, Applicant Arguments/Remarks Made in an Amendment (July 23, 2018)</p> <p>Application No. 61/715,819 at [0007], [0008], [00016], [00017], [00018]</p> <p><i>See also evidence cited for "focusing optical</i></p>		

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			<i>element,"</i> <i>"collimating optical element,"</i> <i>"collecting optical element"</i>		
"collimating optical element"	'582 Patent, cls. 1, 6, 14, 20, 18, 21; '106 Patent, cls. 1, 13	No construction necessary; plain and ordinary meaning. <i>That is:</i> an optical element, such as a lens, mirror, or grating, to render rays of light more nearly parallel; a collimator	'582 Patent, Abstract; 2:26-29; 2:59-61; 4:34-5:22; 6:26-56; 8:56-9:10; 9:51-65; 10:20-23; 12:62-13:26; 13:41-44; 13:45-14:11; 14:35-40; 20:18-33; 20:62-21:11; 21:40-48; 22:24-46; 26:7-9; 27:9-21; 28:15-35; 28:49-65; 28:66-29:25;	35 U.S.C. § 112, ¶ 6 / 35 U.S.C. § 112(f). ⁸ '582 Patent, cl. 1: Function: (1) receive light from a light source; and (2) project a "collimated beam" onto an	'582 Patent, Abstract; 2:26-29; 4:34-53; 6:39-50; 9:51-65; 20:18-33; 20:62-21:11; 44:58-61; 44:66-45:4; FIGs. 25, 27, 28 '582 Patent File History, Nonprovisional Application No. 15/638,461, cls.

⁸ Where Cytek asserts a term invokes 35 U.S.C. § 112, ¶ 6 / 35 U.S.C. § 112(f) and identifies corresponding structure as being indefinite, Cytek is willing to defer the indefiniteness issues at this time consistent with Cytek's understanding of the Court's preferences to defer indefiniteness to a later stage of the case.

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
		<p><i>Alternatively, if means-plus-function:</i></p> <p>'582 Patent, cl. 1:</p> <p>Function: (1) receive light from a light source; (2) project a collimated beam</p> <p>Structure: a lens, such as an achromatic doublet lens, and structural equivalents thereof</p> <p>'582 Patent, cl. 14:</p>	<p>29:26-52; 29:53-30:4; 35:14-35:35; 36:16-32; 43:30-42; 44:1-34; 44:35-57; 44:58-45:7; 45:8-15; 45:16-43; 45:44-54; 45:55-46:5; 46:6-29; 46:51-59; 46:60-47:7; 49:16-46; 56:5-31; 57:47-55; FIGs. 25, 26, 27, 28</p> <p>'582 Patent, Claims 1, 3-14, 16-21, 24</p> <p>'443 Patent, Claims 8, 10, 20</p> <p>'106 Patent, 1, 7, 12, 13, 16, 18</p>	<p>optical relay element.</p> <p>Structure: Indefinite.</p> <p>'582 Patent, cl. 14:</p> <p>Function: (1) receive light from a light source; and (2) project a “collimated beam” including a first image onto an optical relay element.</p> <p>Structure: Indefinite.</p> <p>'582 Patent, cl. 20:</p>	<p>1, 162, 168, 207, 244, 266, 301</p> <p>Provisional Application No. 61/715,819 (filed October 18, 2012), [0006]; [0007]; [0016]; FIGs. 1, 4; cls. 1, 7</p> <p>'412 Patent File History, October 27, 2016 Applicant Reply to Office Action of June 27, 2016</p>

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
		<p>Function: (1) receive light from a light source; (2) project a collimated beam including a first image</p> <p>Structure: a lens, such as an achromatic doublet lens, and structural equivalents thereof</p> <p>'582 Patent, cl. 20:</p> <p>Function: (1) receive light from a light source; (2)</p>	<p>'412 Patent FH, Claims (Nov. 26, 2014); Claims (June 3, 2016); Applicant Arguments/Remarks Made in Amendment (June 3, 2016); Applicant Arguments/Remarks Made in an Amendment (Oct. 27, 2016)</p> <p>'582 Patent FH, Amendment to the Claims (06-30-2017); Claims (11/29/2018); Applicant Arguments/Remarks Made in Amendment</p>	<p>Function: (1) receive light from a light source; and (2) project a first image onto an optical relay element.</p> <p>Structure: Indefinite.</p> <p>'106 Patent, cls. 1, 13:</p> <p>Function: (1) receive fluorescent light collected by the collecting optical element; and (2) collimate the fluorescent light that is projected</p>	

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
		<p>project a first image</p> <p>Structure: a lens, such as an achromatic doublet lens, and structural equivalents thereof</p> <p>'106 Patent, cls. 1, 13:</p> <p>Function: (1) receive the fluorescent light collected by the collecting optical element; (2) collimate the fluorescent light</p> <p>Structure: a lens, such as an</p>	<p>(Nov. 29, 2018); Notice of Allowance and Fees Due (Feb. 9, 2019)</p> <p>'443 Patent FH, Claims (Nov. 4, 2022)</p> <p>'106 Patent FH, Claims (Dec. 22, 2021); Claims (April 9, 2024); Claims (June 4, 2024); Claims (July 18, 2024); Claims (August 30, 2024); Examiner Interview Summary Record (May 24, 2024); Applicant Arguments/Rem</p>	<p>onto a first dichroic filter.</p> <p>Structure: Indefinite.</p> <p>Alternatively, if not construed as means-plus-function:</p> <p>“an optical component at a focal distance from a light source that projects a ‘collimated beam’ centered on the optical axis such that a ‘portion of the collimated beam’ is projected onto a</p>	

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
		achromatic doublet lens, and structural equivalents thereof <i>See, e.g.,</i> '582 Patent, Abstract; 2:26-29; 2:59-61; 4:34-5:22; 6:26-56; 8:56-9:10; 9:51-65; 10:20-23; 12:62-13:26; 13:41-44; 13:45-14:11; 14:35-40; 20:18-33; 20:62-21:11; 21:40-48; 22:24-46; 26:7-9; 27:9-21; 28:15-35; 28:49-65; 28:66-29:25; 29:26-52; 29:53-30:4; 35:14-35:35; 36:16-32;	arks Made in Amendment (July 19, 2024); Applicant Arguments/Remarks Made in Amendment (June 10, 2024); Applicant Arguments/Remarks Made in an Amendment (July 18, 2024); Notice of Allowance (Sept. 11, 2024) Application No. 61/715,819 at Fig. 2, [0004], [0005], [0006], [0007], [0009], [0011], [00016], [00017]	first focusing optical element," and another 'portion of the collimated beam' is projected onto a first optical relay element," otherwise indefinite.	

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff’s Proposed Construction	Plaintiff’s Intrinsic Evidence	Defendant’s Proposed Construction	Defendant’s Intrinsic Evidence
		43:30-42; 44:1-34; 44:35-57; 44:58-45:7; 45:8-15; 45:16-43; 45:44-54; 45:55-46:5; 46:6-29; 46:51-59; 46:60-47:7; 49:16-46; 56:5-31; 57:47-55; FIGs. 25, 26, 27, 28	<i>See also evidence cited for “collimating”/ “collimated,” “collimated beam,” “optical element,” “focusing optical element,” and “collecting optical element.”</i>		
“collecting optical element”	’106 Patent, cls. 1, 2, 13	No construction necessary; plain and ordinary meaning. <i>That is:</i> an optical element, such as a lens,	’582 Patent, Abstract; 2:7-11; 2:41-43; 2:49-51; 3:7-36; 5:47-6:6; 6:26-56; 7:3-9; 7:10-27; 7:28-38; 7:45-56; 7:57-8:65;	35 U.S.C. § 112, ¶ 6 / 35 U.S.C. § 112(f). Function: collect and focus fluorescent light emitted by a	’582 Patent, Abstract; 2:41-43; 3:7-36; 5:47-65; 6:26-38; 6:59-66; 7:15-22; 7:32-38; 7:49-56; 7:57-8:11; 8:41-43;

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
		mirror, or grating, to gather light; a collector <i>Alternatively, if means-plus-function:</i> Function: collect and focus fluorescent light emitted by a particle illuminated by the light source such that the fluorescent light leaving the collecting optical element converges. Structure: an objective and structural	9:10-24; 10:24-26; 10:31-36; 10:60-67; 11:4-9; 11:19-24; 14:41-54; 14:55-57; 14:62-67; 15:9-18; 15:31-32; 15:36-41; 15:56-67; 16:8-14; 21:49-57; 23:1-25; 23:46-50; 23:51-55; 23:56-59; 23:60-63; 24:8-14; 24:15-21; 24:22-24; 24:25-28; 24:29-32; 24:33-36; 24:37-43; 24:44-51; 24:52-57; 24:58-61; 27:59-28:13; 29:36-45; 31:18-23; 31:24-44; 31:56-64; 32:48-33:12-42; 34:4-	particle illuminated by the light source such that the fluorescent light leaving the collecting optical element converges. Structure: (1) a concave mirror and an aberration corrector plate attached to the flow cell with the flow cytometer's viewing zone located between the mirror and the plate; or (2) a concave mirror attached to the	9:10-24; 10:31-36; 10:60-64; 10:66-67; 11:4-9; 11:19-24; 14:41-54; 14:62-67; 15:9-18; 15:31-32; 15:36-41; 15:56-67; 16:8-14; 21:51-57; 33:14-42; 34:15-17; 34:43-55; 35:14-36:55; 51:45-57; FIGs. 1, 8, 8A, 8B, 9A, 10, 11, 12, 13, 36 '582 Patent File History, Nonprovisional Application No. 15/638,461, cl. 1, 187, 244, 263, 275, 285

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
		equivalents thereof <i>See, e.g.,</i> '582 Patent, Abstract; 2:7-11; 2:41-43; 2:49-51;3:7-36; 5:47-6:6; 6:26-56; 7:3-9; 7:10-27; 7:28-38; 7:45-56; 7:57-8:65; 9:10-24; 10:24-26; 10:31-36; 10:60-67; 11:4-9; 11:19-24; 14:41-54; 14:55-57; 14:62-67; 15:9-18; 15:31-32; 15:36-41; 15:56-67; 16:8-14; 21:49-57; 23:1-25; 23:46-50; 23:51-55; 23:56-59; 23:60-63; 24:8-	14; 34:15-42; 34:43-59; 35:18-35; 35:36-59; 35:60-36:32; 43:31-42; 44:53-67; 48:53-67; 49:8-46; 49:47-52; 51:32-44; 51:45-57; 51:58-52:4; 52:5-14; 53:42-50; 53:51-54:2; 54:12-56:56; 57:1-7; FIGs. 1, 8, 8A, 8B, 9A, 10, 11, 12, 13, 36 '106 Patent, Claims 1, 2, 8, 9, 13, 18, 20 '107 Patent, claim 14 '412 Patent FH, Claims (Nov. 26,	flow cell and an aberration corrector plate with the flow cytometer's viewing zone located between the mirror and the plate; or (3) a concave mirror and an aberration corrector plate attached to the flow cell with the flow cytometer's viewing zone located between the mirror and the plate and a chromatic compensating doublet lens; or (4) a concave	

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
		14; 24:15-21; 24:22-24; 24:25-28; 24:29-32; 24:33-36; 24:37-43; 24:44-51; 24:52-57; 24:58-61; 27:59-28:13; 29:36-45; 31:18-23; 31:24-44; 31:56-64; 32:48-33:12-42; 34:4-14; 34:15-42; 34:43-59; 35:18-35; 35:36-59; 35:60-36:32; 43:31-42; 44:53-67; 48:53-67; 49:8-46; 49:47-52; 51:32-44; 51:45-57; 51:58-52:4; 52:5-14; 53:42-50; 53:51-54:2; 54:12-56:56; 57:1-7; FIGs. 1, 8, 8A,	2014); Claims (June 3, 2016); Applicant Arguments/Remarks Made in Amendment (June 3, 2016) '106 Patent FH, Claims (Dec. 22, 2021); Claims (April 9, 2024); Claims (June 4, 2024); Claims (July 18, 2024); Claims (August 30, 2024); Applicant Arguments Made in Amendment (April 9, 2024); Examiner Interview Summary	mirror attached to the flow cell and an aberration corrector plate with the flow cytometer's viewing zone located between the mirror and the plate and a chromatic compensating doublet lens. Alternatively, if not construed as means-plus-function: "(1) a concave mirror and an aberration corrector plate attached to the	

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
		8B, 9A, 10, 11, 12, 13, 36	Record (May 24, 2024); Applicant Arguments/Remarks Made in Amendment (June 4, 2024); Applicant Arguments/Remarks Made in Amendment (July 18, 2024); Notice of Allowance (Sept. 11, 2024) Application No. 61/715,819 at [0004] Application No. 61/653,328 at [0002], [0004], [0006], [0007], [0008], [0009], [0010], [0011],	flow cell with the flow cytometer's viewing zone located between the mirror and the plate; or (2) a concave mirror attached to the flow cell and an aberration corrector plate with the flow cytometer's viewing zone located between the mirror and the plate; or (3) a concave mirror and an aberration corrector plate attached to the flow cell with the flow	

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			<p>[00012], [00013], [0014], [0015], [0016], [0017], [0018]</p> <p><i>See also evidence cited for "optical element," "focusing optical element," "collimating optical element."</i></p>	<p>cytometer's viewing zone located between the mirror and the plate and a chromatic compensating doublet lens; or (4) a concave mirror attached to the flow cell and an aberration corrector plate with the flow cytometer's viewing zone located between the mirror and the plate and a chromatic compensating doublet lens," otherwise indefinite.</p>	

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
"focusing optical element"	'582 Patent, cls. 1, 3, 17, 18, 26; '106 Patent, cl. 14	No construction necessary; plain and ordinary meaning. <i>That is:</i> an optical element, such as a lens, mirror, or grating, to converge light <i>Alternatively, if means-plus-function:</i> '582 Patent, cl. 1: Function: (1) receive at least a portion of a collimated beam reflected by the optical relay	'582 Patent, Abstract; 2:62-67; 8:12-34; 9:51-65; 12:40-43; 12:44-49; 20:18-32; 20:40-43; 20:44-49; 20:62-21:10; 21:18-21; 21:22-27; 21:40-48; 29:3-8; 29:64-30:4; 30:31-45; 31:6-23; 31:24-37; 35:31-35; 44:58-45:7; 45:8-15; 45:16-43; 45:44-54; 45:55-46:5; 46:6-29; 46:60-47:7; 47:8-46; 49:38-40; 56:59-57:36; 57:65-58:19; FIGs. 25, 27, 28	35 U.S.C. § 112, ¶ 6 / 35 U.S.C. § 112(f). '582 Patent, cl. 1: Function: (1) receive at least "a portion of a collimated beam" reflected by the optical relay element; (2) focus the portion of the collimated beam received from the optical relay element onto a semiconductor detector. Structure: "focusing lens	'582 Patent, 9:51-65; 20:18-33; 20:40-44; 20:62-21:11; 44:58-63; 44:66-45:4; 45:22-31; 47:18-21; FIGs. 25, 27, 28 '582 Patent File History, Nonprovisional Application No. 15/638,461, cls. 1, 162, 168, 207, 244, 266, 301 Provisional Application No. 61/715,819 (filed October 18, 2012), [0006]; [0007]; [0016]; FIGs. 1, 4; cls. 1, 7

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
		<p>element; (2) focus the portion of the collimated beam received from the optical relay element onto a semiconductor detector</p> <p>Structure: a lens and structural equivalents thereof</p> <p>'582 Patent, cl. 17:</p> <p>Function: (1) receive the collimated beam from the optical relay element at the extended collimated</p>	<p>'582 Patent, Claims 1, 3, 8, 9, 10, 11, 17, 18, 19, 26</p> <p>'106 Patent, Claims 3, 14</p> <p>'107 Patent, Claims 13, 14, 17, 18</p> <p>'582 Patent, FH, Amendment to the Claims (06-30-2017); Claims (11/29/2018); Applicant Arguments/Remarks made in Amendment (Nov. 29, 2018);</p> <p>'412 Patent FH, Claims (Nov. 26,</p>	<p>that is of a size that captures all light rays of the at least a portion of a 'collimated beam.'"</p> <p>'582 Patent, cl. 17:</p> <p>Function: (1) receive the "collimated beam" from the optical relay element at the extended collimated distance and (2) focus the collimated beam onto a first semiconductor detector.</p>	<p>'412 Patent File History, October 27, 2016</p> <p>Applicant Reply to Office Action of June 27, 2016</p>

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
		distance and (2) focus the collimated beam onto a first semiconductor detector Structure: a lens and structural equivalents thereof '582 Patent, cl. 26: Function: focus the light from the optical relay element to a size smaller than the object of the light source onto a semiconductor detector	2014); Claims (June 3, 2016); Applicant Arguments/Remarks Made in Amendment (June 3, 2016); Applicant Arguments/Remarks Made in an Amendment (Oct. 27, 2016) Application No. 61/715,819 at [0005], [0007], [0009], [0016], [0017], [0018], cls 3, 4, 7, 9, 10 <i>See also evidence cited for "optical element,"</i>	Structure: Indefinite. '582 Patent, cl. 26: Function: focus the light from the optical relay element to a size smaller than the object of the light source onto a semiconductor detector. Structure: "focusing lens that is of a size that captures all light rays of the at least a portion of a 'collimated beam.'"	

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
		<p>Structure: a lens and structural equivalents thereof</p> <p>'106 Patent, cl. 14:</p> <p>Function: focus the band of fluorescent light passing through a dichroic filter in the row of dichroic filters onto a corresponding semiconductor detector</p> <p>Structure: a lens and structural equivalents thereof</p>	<p><i>“collecting optical element,”</i> <i>“collimating optical element,”</i> and <i>“focusing lenses . . . configured to focus light”</i></p>	<p>'106 Patent, cl. 14:</p> <p>Function: focus the band of fluorescent light passing through a dichroic filter in the row of dichroic filters onto a corresponding semiconductor detector.</p> <p>Structure: “focusing lens that is of a size that captures all light rays of the band of fluorescent light passing through a dichroic filter.”</p>	

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
		<i>See, e.g.,</i> '582 Patent, Abstract; 8:12-34; 9:51-65; 12:40-43; 12:44-49; 20:18-32; 20:40-43; 20:44-49; 20:62-21:10; 21:18-21; 21:22-27; 21:40-48; 44:58-45:7; 45:8-15; 45:16-43; 45:44-54; 45:55-46:5; 46:6-29; 47:8-25; 49:38-40; 56:59-57:36; 57:65-58:19; FIGs. 25, 27, 28		Alternatively, if not construed as means-plus-function: “lens that is of a size that captures all light rays of the at least a portion of a ‘collimated beam’ and projects a focused beam,” otherwise indefinite.	
“focusing lenses . . . configured to focus light”	'107 Patent, cls. 13, 17	No construction necessary; plain and ordinary meaning	'582 Patent, Abstract; 2:62-67; 8:12-34; 9:51-65; 12:40-43; 12:44-49;	“lenses that capture all collimated light rays that pass through a filter	'582 Patent, 9:51-65; 20:18-33; 20:40-44; 20:62-21:11; 44:58-63; 44:66-

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
		<i>That is:</i> lenses to converge light	20:18-32; 20:40-43; 20:44-49; 20:62-21:11; 21:18-21; 21:22-27; 21:40-48; 29:3-8; 29:64-30:4; 30:31-45; 31:6-23; 31:24-37; 35:31-35; 44:58-45:7; 45:8-15; 45:16-43; 45:44-54; 45:55-46:5; 46:6-29; 47:8-25; 49:8-46; 56:59-57:36; 57:65-58:19; FIGs. 25, 27, 28 '582 Patent, Claims 1, 3, 8, 9, 10, 11, 17, 18, 19, 26 '106 Patent, Claims 3, 14	and project them as converging rays to the focal point of the lens," otherwise indefinite.	45:4; 45:22-31; 47:18-21; FIGs. 25, 27, 28 '582 Patent File History, Nonprovisional Application No. 15/638,461, cls. 1, 162, 168, 207, 244, 266, 301 Provisional Application No. 61/715,819 (filed October 18, 2012), [0006]; [0007]; [0016]; FIGs. 1, 4; cls. 1, 7 '412 Patent File History, October 27, 2016 Applicant Reply

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			<p>'107 Patent, Claims 13, 14, 17, 18</p> <p>'582 Patent, FH, Amendment to the Claims (June 30, 2017); Claims (Nov. 29, 2018); Applicant Arguments/Remarks made in Amendment (Nov. 29, 2018);</p> <p>'412 Patent FH, Claims (Nov. 26, 2014); Claims (June 3, 2016); Applicant Arguments/Remarks Made in Amendment (June 3, 2016); Applicant</p>		<p>to Office Action of June 27, 2016</p>

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			<p>Arguments/Remarks Made in an Amendment (Oct. 27, 2016)</p> <p>Application No. 61/715,819 at [0005], [0007], [0009], [0016], [0017], [0018], cls 3, 4, 7, 9, 10</p> <p><i>See also evidence cited for “optical element,” “collecting optical element,” “collimating optical element,” and “focusing optical element”</i></p>		

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
"portion of the ..."	'582 Patent, cls. 1, 3; '443 Patent, cls. 1, 18; '107 Patent, cls. 1, 16; '106 Patent, cl. 1	No construction necessary; plain and ordinary meaning. <i>That is:</i> a part of any whole, either separated from or integrated with it	'582 Patent, Abstract; 2:30-35; 2:52-53; 3:37-4:21 4:34-5:22; 5:1-46; 6:22-56; 8:12-34; 8:35-55; 9:13-65; 12:30-34; 14:41-53; 15:56-67; 17:62-64; 17:65-18:3; 19:11-16; 20:12-17; 20:18-32; 20:62-21:11; 21:40-48; 23:19-25; 25:9-14; 29:50-52; 44:35-57; 44:58-45:7; 45:8-15 ; 45:16-43; 45:44-54; 46:6-29; 47:8-25; 47:26-31; 49:8-46; 51:45-57; 55:42-61;	"a subset of the spectrum of wavelengths of light within a defined beam" otherwise indefinite.	7:1-3; 8:51-55; 9:51-57; 20:19-25; 20:34-39; 20:66-21:3; 23:19-21; 43:38-39; 44:24-26; 45:8-15; 45:44-49; FIGs. 25, 27, 28

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			56:57-58:47; FIG. 25 '582 Patent, Claims 1, 3, 7, 9 '443 Patent, Claims 1, 2, 3, 7 18, 20 '106 Patent, Claims 1, 5, 6, 12, 18 '107 Patent, Claims 1, 5, 16, 21 '582 Patent, FH, Amendment to the Claims (06- 30-2017); '582 Patent FH, Claims (11/29/2018); '582 Patent FH, Applicant Arguments/Rem		

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			arks made in Amendment (Nov. 29, 2018) '443 Patent FH, Claims (Nov. 4, 2022) '106 Patent FH, Claims (Dec. 22, 2021); '106 Patent FH, Claims (April 9, 2024); '106 Patent FH, Claims (June 4, 2024); '106 Patent FH, Claims (July 18, 2024); '106 Patent FH, Claims (August 30, 2024)		

Exhibit A to Joint Claim Construction Chart

Claim Term(s)	Patent No./Claim No(s).	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendant's Proposed Construction	Defendant's Intrinsic Evidence
			Application No. 61/715,819 at [0016]		