

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

JOAO CONTROL & MONITORING SYSTEMS, LLC, <i>Plaintiff,</i> v. CHRYSLER GROUP LLC, <i>Defendant.</i>	HONORABLE Mark A. Goldsmith Case No. 4:13-cv-13957-MAG
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**PLAINTIFF JOAO CONTROL & MONITORING SYSTEMS, LLC'S
OPENING CLAIM CONSTRUCTION BRIEF**

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I. INTRODUCTION

Pursuant to this Court's Scheduling Order(s) and the practices of the Eastern District of Michigan, Plaintiff Joao Control & Monitoring Systems, LLC ("JCMS"), by and through its counsel, provides its Opening Claim Construction Brief in support of those certain terms of the asserted claims from U.S. Patent Nos. 6,549,130 (the "'130 Patent"), 5,917,405 (the "'405 Patent"), 6,542,076 (the "'076 Patent") and 7,397,363 (the "'363 Patent"), and their claim constructions, as set forth in the Parties' Supplemental Final Joint Claim Construction Chart (Dkt. No. 35).

JCMS reserves the right to alter its constructions based on further discovery, its continuing analysis, and due to new information being learned from Defendant in the course of claim construction briefing.

A. THE ASSERTED PATENTS AND THEIR FILE HISTORIES

The '130 Patent issued on April 15, 2003 from Application No. 09/277,935, which was filed on March 29, 1999, which is a continuation of Application No. 08/683,828, filed July 18, 1996, and issued as the '405 Patent, which is a continuation-in-part of Application No. 08/587,628, filed January 17, 1996, now abandoned, which is a continuation of Application No. 08/489,238, filed June 12, 1995, and issued as U.S. Patent No. 5,513,244, which is a continuation of Application No. 08/073,755, filed on June 8, 1993, now abandoned. Application

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