

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

ROBERT BOSCH LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 12-574-LPS
	)	(consolidated)
ALBEREE PRODUCTS, INC., API KOREA	)	
CO., LTD., SAVER AUTOMOTIVE	)	<b>JURY TRIAL DEMANDED</b>
PRODUCTS, INC., and COSTCO	)	
WHOLESALE CORPORATION,	)	
	)	
Defendants.	)	

**JOINT CLAIM CONSTRUCTION CHART**

Pursuant to Paragraph 16 of the Scheduling Order (D.I. 67), plaintiff Robert Bosch LLC and defendants AlberEE Products, Inc., API Korea Co., Ltd., Saver Automotive Products, Inc., and Costco Wholesale Corp. respectfully submit the Joint Claim Construction Chart containing their proposed constructions for ten disputed terms/phrases for the purpose of the *Markman* briefing and citations to the intrinsic evidence in support of their respective proposed constructions attached as Exhibit 1. Copies of the nine asserted patents and the portions of intrinsic record relied upon are attached as Exhibits 2 to 12H hereto.

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

Mark A. Hannemann  
Jeffrey S. Ginsberg  
Rose Cordero Prey  
Ksenia Takhistova  
KENYON & KENYON LLP  
One Broadway  
New York, NY 10004  
Tel.: (212) 425-7200

By: /s/ Richard L. Horwitz  
Richard L. Horwitz (#2246)  
David E. Moore (#3983)  
Bindu A. Palapura (#5370)  
Hercules Plaza, 6<sup>th</sup> Floor  
1313 N. Market Street  
Wilmington, DE 19801  
Tel: (302) 984-6000  
[rhowitz@potteranderson.com](mailto:rhowitz@potteranderson.com)  
[dmoore@potteranderson.com](mailto:dmoore@potteranderson.com)  
[bpalapura@potteranderson.com](mailto:bpalapura@potteranderson.com)

*Attorneys for Plaintiff Robert Bosch LLC*

MORRIS NICHOLS ARSHT & TUNNELL

OF COUNSEL:

James W. Dabney  
Richard M. Koehl  
HUGHES HUBBARD & REED LLP  
One Battery Park Plaza  
New York, NY 10004-1482  
Tel. (212) 837-6000

By: /s/ Mary B. Graham  
Mary B. Graham (#2256)  
Thomas Curry (#5877)  
1201 N. Market Street,  
P.O. Box 1347  
Wilmington, DE 19899-1347  
Tel. (302) 658-9200  
[mgraham@mnat.com](mailto:mgraham@mnat.com)  
[tcurry@mnat.com](mailto:tcurry@mnat.com)

*Attorneys for Costco Wholesale Corporation*

O'KELLY, ERNST & BIELLI, LLC

OF COUNSEL:

Robert J. Kenney  
Michael T. Smith  
BIRCH, STEWART, KOLASCH & BIRCH, LLP  
8110 Gatehouse Road, Suite 100 East  
P.O. Box 747  
Falls Church, VA 22040-0747  
Tel: (703) 205-8000

By: /s/ Sean T. O'Kelly  
Sean T. O'Kelly (#4349)  
Daniel P. Murray (#5785)  
901 N. Market St., Suite 1000  
Wilmington, DE 19801  
Tel: (302) 778-4001  
[sokelly@oeblegal.com](mailto:sokelly@oeblegal.com)  
[dmurray@oeblegal.com](mailto:dmurray@oeblegal.com)

*Attorneys for Saver Automotive Products, Inc.,  
Alberree Products, Inc., and API Korea Co.,  
Ltd.*

Dated: April 1, 2015  
1185618 / 39026

**INDEX OF EXHIBITS**

<b>Exhibit</b>	<b>Description</b>
1	Parties' Joint Claim Construction Chart
2	U.S. Patent No. 6,553,607
3	U.S. Patent No. 6,611,988
4	U.S. Patent No. 6,668,419
5	U.S. Patent No. 6,836,926
6	U.S. Patent No. 6,973,698
7	U.S. Patent No. 7,228,588
8	U.S. Patent No. 7,484,264
9	U.S. Patent No. 8,099,823
10	U.S. Patent No. 8,272,096
11	Plaintiff's citations to the intrinsic record
11A	Portions of the intrinsic record for U.S. Patent No. 6,611,988
11B	Portions of the intrinsic record for U.S. Patent No. 6,668,419
11C	Portions of the intrinsic record for U.S. Patent No. 6,836,926
11D	Portions of the intrinsic record for U.S. Patent No. 6,973,698
11E	Portions of the intrinsic record for U.S. Patent Nos. 7,228,588 and 7,484,264
11F	Portions of the intrinsic record for U.S. Patent No. 8,272,096
12	Portions of the File Histories Cited by Defendants
12A	US 6,553,607 File History Excerpts
12B	US 6,611,988 File History Excerpts
12C	US 6,668,419 File History Excerpts
12D	US 6,836,926 File History Excerpts
12E	US 6,973,698 File History Excerpts
12F	US 7,228,588 File History Excerpts
12G	US 7,484,264 File History Excerpts
12H	US 8,272,096 File History Excerpts

# Exhibit 1

**Parties' Joint Claim Construction Chart**

Patent	Term/ Phrase	Bosch's construction and intrinsic record citations	Defendants' construction and intrinsic record citations
'607 patent	securing means/ means for securing	To be construed under 35 U.S.C. §112 ¶6: <u>Function:</u> To secure the wiper blade on the joint pin. <u>Structure:</u> L-shaped shoulder, areas and its equivalents. '607 patent col. 1:40-46; 1:55-62; 2:63-67; 5:6-15; 6:8-26; 6:63-7:4; 7:15-21; 7:30-45; 8:43-47; Figs. 2-8, 11, 12; Abstract	"means for securing" denotes both the coupling part (30) and the L-shaped shoulder (60) depicted and described in the '607 patent specification and drawings, and equivalents thereof.  "securing means (60)" denotes the L-shaped shoulder (60) depicted and described in the '607 patent specification and drawings, and equivalents thereof  '607 patent, Abstract, cols. 1:39-47, 1:56-2:2, 2:34-38, 2:63-67, 3:16-40, 4:19-6:27, 6:31-56, 6:63-7:4, Figs. 3-6, 8, 9, 11, 12, claims 1-14; '607 file history, 12/30/02 Notice of Allowance
'988 patent	a coupling part (20) ... seated on another band face (18) of the support element	Plain and ordinary meaning '988 patent col. 1:55-60; 1:64-2:2; 2:26-37; 2:44-59; 3:5-21; 3:25-48; 4:22-44; 6:19-53; 6:64-8:6; Figs. 1-2; Abstract  Prosecution history of the '988 patent: Original application filed on Jan. 24, 2001; Office action mailed Feb. 6, 2002, at 2-7; Amendment in response to Feb. 6, 2002, office action at 3-6, 9-20; May 20, 2002 interview summary; Supplemental amendment in response to Feb. 6, 2002 and June 21, 2002, office actions at 3-7, 9-20; Office action mailed Aug. 13, 2002, at 3-6; Second supp. amendment submitted on Aug. 20, 2002, at 2-5; March 20, 2003 interview summary; March 23, 2003 Notice of allowability and examiner's amendment at 2-3; and references cited therein.	"coupling part (20)" denotes the structure (20) depicted and described in the '988 patent specification and drawings; no equivalents in light of narrowing amendments.  "seated on another band face (18) of the support element" means seated as depicted in Figure 3 of the '988 patent and the accompanying specification description of Figure 3.  '988 patent, Abstract, cols. 1:16-37, 1:41-2:15, 2:26-3:21, 3:25-37, 3:41-5:59, 5:66-6:28, Figs. 1-7, claims 1, 2, 6, 8, 9, 10, 11, 12, 15; '988 file history, 02/06/02 Office Action, 05/01/02 Amendment, 07/01/02 Amendment, 08/13/02 Office Action

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