

UNITED STATES INTERNATIONAL TRADE COMMISSION  
WASHINGTON, D.C.

Before The Honorable Thomas B. Pender  
Administrative Law Judge

In the Matter of

CERTAIN ROBOTIC VACUUM  
CLEANING DEVICES AND  
COMPONENTS THEREOF SUCH AS  
SPARE PARTS

Investigation No. 337-TA-1057

**JOINT CLAIM CONSTRUCTION CHART**

Pursuant to the Order No. 11 and Ground Rule No. 8.3, Complainant iRobot Corporation (“iRobot”) and Respondents Hoover Inc., Royal Appliance Manufacturing Co., *d/b/a* TTI Floor Care North America Inc., The Black & Decker Corporation, Black & Decker (U.S.) Inc., Shenzhen Silver Star Intelligent Technology Co., Ltd., BISSELL Homecare, Inc., Matsutek Enterprises Co., Ltd., Bobsweep, Inc., Bobsweep USA, Shenzhen Zhiyi Technology Co., Ltd., Suzhou Real Power Electric Appliance Co., Ltd. (together “Respondents”) submit the attached Joint Claim Construction Chart for disputed terms appearing in U.S. Patent Nos. 6,809,490 (“490 patent”), 7,155,308 (“308 patent”), 8,474,090 (“090 patent”), 8,600,553 (“553 patent”), 9,038,233 (“233 patent”), 9,486,924 (“924 patent”). Section I of the attached Joint Claim Construction Chart identifies terms for which the parties have agreed upon a construction. Section II identifies the disputed terms and each party’s proposed constructions.

iRobot identifies (1) “housing” (’090 patent, Claims 1, 5, 7, 10, 13, 14, 16); (2) “a bounce mode whereby the robot travels substantially in a direction away from an obstacle after encountering the obstacle” (’490 patent, Claims 1, 42); (3) “isolated area” (’490 patent, Claims

1, 42); (4) “speed setting” (’553 patent, Claims 1, 11, 25); and (5) “heading setting” (’553 patent, Claims 1, 25) as the terms whose construction will be most significant to the resolution of the case.

Respondents identify (1) “while continuing towards the object” (’553 patent, Claim 11); (2) “control system configured to operate the robot in a plurality of operational modes and to select from among the plurality of modes in real time in response to signals generated by the obstacle detection sensor” (’490 patent, Claims 1, 42); (3) “A sensor subsystem for an autonomous robot” (’308 patent, Claims 1, 19); (4) “pass between” in the context of “the side brush having bundles of bristles and being positioned such that the bundles of bristles pass between the cliff detector and the floor surface during a rotation of the side brush around the axis, the bundles of bristles being separated by a gap, the gap being configured to prevent occlusion of the cliff detector beam during at least part of the rotation of the side brush around the axis” (’233 patent, Claims 1, 15); and (5) “instructions” (’924 patent, Claims 1 and 12) as the terms whose construction will be most significant to the resolution of this case.

Dated: August 18, 2017

Respectfully submitted,

/s/ Kecia J. Reynolds

Kecia J. Reynolds

**PILLSBURY WINTHROP SHAW  
PITTMAN LLP**

1200 Seventeenth St. NW  
Washington, DC 20036  
Tel: (202) 663-8025  
Fax: (202) 663-8007

William P. Atkins

Jack S. Barufka

Bryan P. Collins

Sean M. Weinman

Michael K. Heins

**PILLSBURY WINTHROP SHAW  
PITTMAN LLP**

1650 Tysons Blvd., 14th Floor  
McLean, Virginia 22102  
Tel: (703) 770-7900  
Fax: (703) 770-7901

Jack Ko, Ph.D.

**PILLSBURY WINTHROP SHAW  
PITTMAN LLP**

Suite 4201, Bund Center,  
222 Yan An Road East  
Shanghai 200002 China  
Tel: (86) 21-6137-7999  
Fax: (86) 21-6137-7900

*Counsel for Respondents Hoover, Inc., Royal  
Appliance Manufacturing Co., Inc. d/b/a TTI  
Floor Care North America Inc., The Black &  
Decker Corporation, Black & Decker (U.S.)  
Inc., Shenzhen Silver Star Intelligent  
Technology Co., Ltd., bObsweep, Inc., and  
bObsweep USA*

/s/ Stephen A. Marshall

Ruffin B. Cordell

Ralph A. Phillips

Stephen A. Marshall

Linhong Zhang

Thomas S. Fusco

Michael S. Ballanco

Jack R. Wilson

Matthew Mahoney

**FISH & RICHARDSON P.C.**

901 15<sup>th</sup> Street, N.W., Suite 700  
Washington, DC 20005  
Tel: (202) 783-5070  
Fax: (202) 783-2331

Warren K. Mabey, Jr.

**FISH & RICHARDSON P.C.**

222 Delaware Avenue, 17<sup>th</sup> Floor  
Wilmington, DE 19801  
Tel: (302) 652-5070  
Fax: (302) 783-2331

Andrew G. Pearson

**FISH & RICHARDSON P.C.**

One Marina Park Drive  
Boston, MA 02210  
Tel: (617) 542-5070  
Fax: (617) 783-2331

*Counsel for Complainant iRobot Corporation*

/s/ Patrick J. McCarthy

Mark G. Davis  
Ronald J. Pabis  
Patrick J. McCarthy  
Myomi T. Coad  
**GREENBERG TRAUIG, LLP**  
2101 L Street, N.W. Suite 1000  
Washington, D.C. 20037  
Tel: (202) 331-3100  
Fax: (202) 331-3101

Nicholas A. Brown  
**GREENBERG TRAUIG, LLP**  
4 Embarcadero Center  
Suite 3000  
San Francisco, CA 94111  
Telephone: (415) 655-1271  
Facsimile: (415) 520-5609

Jonathan Ball  
**GREENBERG TRAUIG, LLP**  
MetLife Building  
200 Park Avenue  
New York, NY 10166  
Telephone: (212) 801-9200  
Facsimile: (212) 801-6400

Stephen M. Ullmer  
**GREENBERG TRAUIG, LLP**  
The Tabor Center  
1200 17<sup>th</sup> Street, Suite 2400  
Denver, CO 80202  
Telephone: (303) 572-6500  
Facsimile: (303) 572-6540

Ping Gu  
**ZHONG LUN LAW FIRM**  
31, 33, 36, 37/F, SK Tower, 6A  
Jianguomenwai Avenue, Chaoyang District  
Beijing 100022, P.R.China  
Telephone: 86-10-5957228  
Facsimile: 86-10-59571022/1838  
guping@zhonglun.com

*Counsel for Respondent Shenzhen Zhiyi  
Technology Co., Ltd.*

/s/ Rachel E. Burnim

Harold H. Davis, Jr.  
Rachel E. Burnim  
**K&L GATES LLP**  
4 Embarcadero Center, Ste 1200  
San Francisco, CA 94111  
Tel: (415) 882-8200  
Fax: (415) 882-8220

Jay C. Chiu  
**K&L GATES LLP**  
1 Park Plaza  
Twelfth Floor  
Irvine, CA 92614

Eric C. Rusnak  
**K&L Gates LLP**  
1601 K Street, NW  
Washington, DC 20006

*Counsel for Respondents  
BISSELL HOMECARE, INC. and  
MATSUTEK ENTERPRISE CO., LTD.*

**Joint Claim Construction Chart**  
ITC Investigation No. 337-TA-1057

**I. Agreed Upon Terms**

The parties have agreed upon the construction for the following terms

Claim Term	Agreed Construction
<b>'308 Patent</b>	
“collimator” (Claims 11, 12, 20)	“structure through which light passes to bound the optical field of detector”
“defined field of view” / “defined field of emission” (“defined field”) (Claims 1, 2, 3)	“region within which light can be detected” / “region within which light can be emitted”
<b>'090 Patent</b>	
“chassis” (Claims 1, 10, 17)	“the frame of the floor cleaning robot to which components are at integrated”
<b>'233 Patent</b>	
“passes between a portion of a drive wheel of the robot and the cleaning surface” (Claim 14)	“passes under a portion of a drive wheel not in contact with the floor cleaned”
<b>'490 Patent</b>	
“means for manually selecting an operational mode” (Claim 12)	Function: manually selecting an operational mode  Structure: an input element [such as] a selector switch, push button [by which] the user can select the particular operational mode (8:4
“means for moving the robot over a surface” (Claims 1, 13, 21, 26, 36, 42)	Function: propelling the robot over a driving surface  Structure: two wheels and motors 21 for driving them independent
<b>'553 Patent</b>	
“nor-linear” (Claim 21)	“non-linear”

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