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,

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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
'308 Patent	
"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"
'090 Patent	
"chassis" (Claims 1, 10, 17)	"the frame of the floor cleaning robot to which components are at integrated"
'233 Patent	
"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 fl cleaned"
'490 Patent	
"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 butto [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 independen
'553 Patent	
"nor-linear" (Claim 21)	"non-linear"

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