

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MOLO DESIGN LTD.,

Plaintiff,

v.

CHANEL, INC.,

Defendant.

No. 1:21-cv-01578 (VEC)

JOINT DISPUTED CLAIM TERMS CHART

Pursuant to Rule 11 of the Local Patent Rules for the Southern District of New York (“Local Patent Rules”) and the Court’s Civil Case Management Plan and Scheduling Order, dated April 22, 2021, Plaintiff Molo Design Ltd. (“Molo”) and Defendant Chanel, Inc. (“Chanel”) hereby submit the parties’ Joint Disputed Claim Terms Chart. Exhibit A lists the parties’ agreed claim constructions for terms and phrases found in the asserted claims of U.S. Patent Nos. 7,866,366 (“the ’366 Patent”), 8,561,666 (“the ’666 Patent”), 9,689,161 (“the ’161 Patent”), and 9,797,134 (“the ’134 Patent”). Exhibit B lists the disputed claim terms and phrases, including each party’s proposed construction, and cross-references to each party’s identification of the related paragraphs of the invalidity and infringement contention disclosures for the ’366 Patent, the ’666 Patent, the ’161 Patent, and the ’134 Patent.

Dated: September 24, 2021

Respectfully submitted,

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EXHIBIT A

Exhibit A

Agreed Constructions

Term or Phrase	Claims	Parties' Agreed Construction
major dimension	'366 Patent, claims 20-22	height
longitudinal axis	'366 Patent, claim 5	vertical axis from top to bottom