

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**C&M OILFIELD RENTALS, LLC  
D/B/A C-MOR ENERGY SERVICES,**

**Plaintiff,**

v.

**ENSIGN US SOUTHERN DRILLING  
LLC,**

**Defendant.**

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**Civil Action No. 4:22-cv-00965**

**JURY TRIAL DEMANDED**

**PLAINTIFF C&M OILFIELD RENTALS, LLC'S  
DISCLOSURE OF PROPOSED CLAIM TERMS FOR CONSTRUCTION**

Pursuant to the Patent Scheduling Order (ECF No. 35), the Court's Order Extending Certain Deadlines of the Scheduling Order (ECF No. 43), and P.R. 4-1, Plaintiff C&M Oilfield Rentals, LLC ("C&M") identifies below its proposed terms or phrases for construction from the asserted claims of U.S. Patent Nos. 10,900,626 and 10,976,016. C&M's identification of claim terms or phrases below include the identification of terms within those phrases.

C&M reserves the right to supplement, revise, modify, and/or otherwise finalize its proposed terms and claim elements for construction by, without limitation: (i) adding or removing surrounding words from the identified term or claim limitation; (ii) combining two proposed terms or constructions into a single proposed term or claim element; and/or (iii) splitting a proposed term or claim element into two or more proposed terms or constructions.

C&M also reserves the right to supplement, revise, modify, and/or otherwise finalize its proposed terms and claim elements for construction in response to, without limitation: (i) any term or claim element proposed by Defendant Ensign US Southern Drilling, LLC ("Ensign") for construction; (ii) any evidence and supporting materials cited or otherwise identified by Ensign;

or (iii) any argument by Ensign. C&M further reserves the right to present constructions, if necessary, for any term or claim element proposed by Ensign for construction.

C&M's proposed terms and claim elements for construction are as follows:

- "crown deck" (claims 9 and 19 of the '626 Patent and claims 1, 2, 23 of the '016 Patent)
- "mounting pole" (claims 9 and 19 of the '626 Patent and claims 1 and 23 of the '016 Patent).

Dated: March 27, 2023

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that a true and correct copy of the foregoing document was served via the Court's ECF/CM e-filing system to all counsel of record on March 27, 2023.

/s/ Elizabeth M. Chiaviello  
Elizabeth M. Chiaviello