UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

SLINGSHOT PRINTING LLC, Plaintiff, v. CANON U.S.A., INC. and CANON SOLUTIONS AMERICA, INC. Defendants.	2:22-cv-1852-HGJ-AYS

DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS

Pursuant to Local Patent Rule 6, Plaintiff, Slingshot Printing LLC ("Slingshot") identifies below each claim of each patent-in-suit (United States Patent Nos. 7,484,823; 7,594,708; and 7,290,864) infringed by Defendants Canon U.S.A., Inc. ("Canon U.S.A") and/or Canon Solutions America, Inc. ("CSA") and each product or process of Defendants which Slingshot is currently aware that allegedly infringes each identified claim.

Slingshot bases these disclosures on its current knowledge, understanding, and belief as to the facts and information available to it as of the date of these disclosures. This case is in an early stage of discovery and Slingshot has not yet completed its investigation, collection of information, discovery, or analysis related to this action. The evidence cited in support of the disclosures herein is necessarily exemplary only and is therefore illustrative and not exhaustive. Slingshot has not yet received documents or other information within the possession, custody, or control of Defendants. Slingshot reserves the right to amend these contentions as its investigation continues.

These disclosures are based at least in part upon Slingshot's present understanding of the meaning and scope of the claims of the patents in suit, in the absence of additional claim construction proceedings or discovery. Slingshot reserves the right to seek leave to supplement or amend these disclosures if its understanding of the claims changes, and, in particular, if supplementation is appropriate to reflect any construction of claim language provided by the Court.

I. IDENTIFICATION OF EACH CLAIM OF THE PATENTS-IN-SUIT INFRINGED BY EACH DEFENDANT

A. U.S. Patent No. 7,484,823 ("the '823 patent").

1. Canon U.S.A. infringes at least claims 1-3, 5-6, 8-13, and 15-17 of the '823 patent.
2. CSA infringes at least claims at least claims 1, 5-6, 8-12, and 15-17 of the '823 patent.

B. U.S. Patent No. 7,594,708 ("the '708 patent")

1. Canon U.S.A. infringes at least claims 1–3, 5-6, 8-12, and 14-15 of the '708 patent.
2. CSA infringes at least claims 1, 5-6, 8-10, and 14-15 of the '708 patent.

C. U.S. Patent No. 7,290,864 ("the '864 patent")

1. Canon U.S.A. infringes at claims 1–6 and 8-17, and 19-20 of the '864 patent.
2. CSA infringes at least claims 1-2, 4, 5-6, 8, 10-14, 16-17, and 19-20 of the '864 patent.

II. DEFENDANTS' INFRINGING PRODUCTS

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Slingshot identifies the following products as literally infringing each of the identified claims. Slingshot reserves the right to assert infringement under the doctrine of equivalents, to the extent that the difference between any product or component and any claim element is insubstantial. Infringement of the identified claims is illustrated in claim charts attached hereto as Exhibits 1-3, and the products identified relative to each claim in the charts are currently believed to be representative of the products identified below.

A. Canon U.S.A. Products Infringing '823 Patent Claims 1, 2, 3, 5, 6, 8, 9, and 10 (Ex. 1).

1. **Maxify Printers:** Maxify iX6820.
2. **Pixma Printers:** Pixma Pro-200, Pixma G1200, Pixma G1220, Pixma G2200, Pixma G2260, Pixma G3200, Pixma G3202, Pixma G3260, Pixma G4210, Pixma G5020, Pixma G6020, Pixma G7020, Pixma MG2120, Pixma MG2220, Pixma MG2420, Pixma MG2522, Pixma MG2525, Pixma MG2920, Pixma MG2922, Pixma MG2924, Pixma MG3020, Pixma MG3022, Pixma MG3120, Pixma MG3122, Pixma MG3220, Pixma MG3222, Pixma MG3520, Pixma MG3522, Pixma MG3620, Pixma MG4120, Pixma MG4220, Pixma MX320, Pixma MX330, Pixma MX340, Pixma MX350, Pixma MX360, Pixma MX372, Pixma MX392, Pixma MX410, Pixma MX420, Pixma MX432, Pixma MX439, Pixma MX452, Pixma MX459, Pixma MX472, Pixma MX479, Pixma MX490, Pixma MX492, Pixma MX512, Pixma MX522, Pixma MX532, Pixma TR4520, Pixma TR4522, Pixma TR7020, Pixma TR7022, Pixma TS202, Pixma TS302, Pixma TS3120, Pixma TS3122, Pixma TS3320, Pixma TS3322, Pixma

TS5120, Pixma TS5320, Pixma TS6420, Pixma iP100, Pixma iP110, Pixma iP2700, Pixma iP2702, and Pixma iP2820.

3. **Ink cartridges:** CL-211, CL-211XL, CL-241, CL-241XL, CL-244, CL-244XL, CL-246, CL-246XL, CL-261, and CL-261XL.
4. **Printheads containing the following die part numbers (and printers/cartridges using such printheads):** LQ4220, LQ4300, LQ4350, LQ4390, LQ 4500 (including LQ4500A and LQ4500A-23), LQ4590, LQ4640, LQ4670, LQ4760, LQ4780 (including LQ4780-13).
5. **Large Format printers/printheads:** PF-10 printheads and printers using PF-10 printheads, including imagePROGRAF PRO-1000, PRO-2000, PRO-2100, PRO-4000, PRO-4000S, PRO-4100, PRO-4100S, PRO-6000, PRO-6000S, PRO-6100, and PRO-6100S large format inkjet printers.
6. **Additional printheads (and printers/cartridges using such printheads):** In addition to those products specifically identified above, other printheads (or products containing a printhead) having a chip with at least three parallel ink vias, an area between the first and second ink vias having a first temperature sensing element substantially centrally disposed between first and second columns of heater actuators, and an area between the second and third ink vias having a second temperature sensing element substantially centrally disposed between third and fourth columns of heater actuators.

B. Canon U.S.A. Processes Infringing '823 Patent Claims 11, 12, 13, 15, 16, and 17 (Ex. 1).

1. **Manufacture and/or importation of the following Maxify printers:** Maxify iX6820.
2. **Manufacture and/or importation of the following Pixma printers:** Pixma Pro-200, Pixma G1200, Pixma G1220, Pixma G2200, Pixma G2260, Pixma G3200, Pixma G3202, Pixma G3260, Pixma G4210, Pixma G5020, Pixma G6020, Pixma G7020, Pixma MG2120, Pixma MG2220, Pixma MG2420, Pixma MG2522, Pixma MG2525, Pixma MG2920, Pixma MG2922, Pixma MG2924, Pixma MG3020, Pixma MG3022, Pixma MG3120, Pixma MG3122, Pixma MG3220, Pixma MG3222, Pixma MG3520, Pixma MG3522, Pixma MG3620, Pixma MG4120, Pixma MG4220, Pixma MX320, Pixma MX330, Pixma MX340, Pixma MX350, Pixma MX360, Pixma MX372, Pixma MX392, Pixma MX410, Pixma MX420, Pixma MX432, Pixma MX439, Pixma MX452, Pixma MX459, Pixma MX472, Pixma MX479, Pixma MX490, Pixma MX492, Pixma MX512, Pixma MX522, Pixma MX532, Pixma TR4520, Pixma TR4522, Pixma TR7020, Pixma TR7022, Pixma TS202, Pixma TS302, Pixma TS3120, Pixma TS3122, Pixma TS3320, Pixma TS3322, Pixma TS5120, Pixma TS5320, Pixma TS6420, Pixma iP100, Pixma iP110, Pixma iP2700, Pixma iP2702, and Pixma iP2820.
3. **Manufacture and/or importation of the following ink cartridges:** CL-211, CL-211XL, CL-241, CL-241XL, CL-244, CL-244XL, CL-246, CL-246XL, CL-261, and CL-261XL.
4. **Manufacture and/or importation of printheads containing the following die part numbers (and printers/cartridges using such printheads):** LQ4220,

LQ4300, LQ4350, LQ4390, LQ4500 (including LQ4500A and LQ4500A-23), LQ4590, LQ4640, LQ4670, LQ4760, LQ4780 (including LQ4780-13).

5. **Manufacture and/or importation of the following Large Format printers/printheads:** PF-10 printheads and printers using PF-10 printheads, including imagePROGRAF PRO-1000, PRO-2000, PRO-2100, PRO-4000, PRO-4000S, PRO-4100, PRO-4100S, PRO-6000, PRO-6000S, PRO-6100, and PRO-6100S large format inkjet printers.

6. **Manufacture and/or importation of the following additional printheads (and printers/cartridges using such printheads):** In addition to those products specifically identified above, other printheads (or products containing a printhead) having a chip with at least three parallel ink vias, an area between the first and second ink vias having a first temperature sensing element substantially centrally disposed between first and second columns of heater actuators, and an area between the second and third ink vias having a second temperature sensing element substantially centrally disposed between third and fourth columns of heater actuators.

C. CSA Products Infringing '823 Patent Claims 1, 5, 6, 8, 9, and 10 (Ex. 1).

1. **Large Format printers/printheads:** PF-10 printheads and printers using PF-10 printheads, including imagePROGRAF PRO-1000, PRO-2000, PRO-2100, PRO-4000, PRO-4000S, PRO-4100, PRO-4100S, PRO-6000, PRO-6000S, PRO-6100, and PRO-6100S large format inkjet printers.

2. **Additional printheads (and printers/cartridges using such printheads):** In addition to those products specifically identified above, other printheads (or products containing a printhead) having a chip with at least three parallel ink vias, an area between the first and second ink vias having a first temperature sensing element substantially centrally disposed between first and second columns of heater actuators, and an area between the second and third ink vias having a second temperature sensing element substantially centrally disposed between third and fourth columns of heater actuators.

D. CSA Processes Infringing '823 Patent Claims 11, 12, 15, 16, and 17 (Ex. 1).

1. **Manufacture and/or importation of the following Large Format printers/printheads:** PF-10 printheads and printers using PF-10 printheads, including imagePROGRAF PRO-1000, PRO-2000, PRO-2100, PRO-4000, PRO-4000S, PRO-4100, PRO-4100S, PRO-6000, PRO-6000S, PRO-6100, and PRO-6100S large format inkjet printers.
2. **Manufacture and/or importation of the following additional printheads (and printers/cartridges using such printheads):** In addition to those products specifically identified above, other printheads (or products containing a printhead) having a chip with at least three parallel ink vias, an area between the first and second ink vias having a first temperature sensing element substantially centrally disposed between first and second columns of heater actuators, and an area between the second and third ink vias having a second temperature sensing element substantially centrally disposed between third and fourth columns of heater actuators.

E. Canon U.S.A. Products Infringing '708 Patent Claims 1, 5, and 6 (Ex. 2).

1. **Maxify and Pixma Printers:** Maxify iX6820, Pixma Pro-200.
2. **Printheads containing the following die part numbers (and printers/cartridges using such printheads):** LQ4390 (including LQ4390A), LQ4350.
3. **Large Format printers/printheads:** PF-10 printheads and printers using PF-10 printheads, including imagePROGRAF PRO-1000, PRO-2000, PRO-2100, PRO-4000, PRO-4000S, PRO-4100, PRO-4100S, PRO-6000, PRO-6000S, PRO-6100, and PRO-6100S large format inkjet printers.
4. **Additional printheads (and printers/cartridges using such printheads):** In addition to those products specifically identified above, other printheads (or products containing a printhead) including a chip having at least two ink vias having a column of heater actuators on each side of the vias and a single temperature sensing element adjacent and substantially parallel to each column of heater actuators.

F. Canon U.S.A. Products Infringing '708 Patent Claims 2 and 3 (Ex. 2).

1. **Maxify and Pixma Printers:** Maxify iX6820, Pixma Pro-200.
2. **Printheads containing the following die part numbers (and printers/cartridges using such printheads):** LQ4390 (including LQ4390A), LQ4350.
3. **Additional printheads (and printers/cartridges using such printheads):** In addition to those products specifically identified above, other printheads (or products containing a printhead) including a chip having at least two ink vias

having a column of heater actuators on each side of the vias and a single temperature sensing resistor or thermal sense resistor adjacent and substantially parallel to each column of heater actuators.

G. Canon U.S.A. Products Infringing '708 Patent Claim 8 (Ex. 2).

4. **Maxify and Pixma Printers:** Pixma Pro-200.
5. **Printheads containing the following die part numbers (and printers/cartridges using such printheads):** LQ4390 (including LQ4390A).
6. **Additional printheads (and printers/cartridges using such printheads):** In addition to those products specifically identified above, other printheads (or products containing a printhead) including a chip having at least two ink vias having a column of heater actuators on each side of the vias and a single temperature sensing element adjacent and substantially parallel to each column of heater actuators, at least one temperature sensing element disposed between an ink via and an edge of the chip.

H. Canon U.S.A. Processes Infringing '708 Patent Claims 9, 10, 14, and 15 (Ex. 2).

1. **Manufacture and/or importation of the following Maxify and Pixma Printers:** Maxify iX6820, Pixma Pro-200.
2. **Manufacture and/or importation of the following printheads containing the following die part numbers (and printers/cartridges using such printheads):** LQ4390 (including LQ4390A), LQ4350.
3. **Manufacture and/or importation of the following Large Format printers/printheads:** PF-10 printheads and printers using PF-10 printheads, including imagePROGRAF PRO-1000, PRO-2000, PRO-2100, PRO-4000,

PRO-4000S, PRO-4100, PRO-4100S, PRO-6000, PRO-6000S, PRO-6100, and PRO-6100S large format inkjet printers.

4. **Manufacture and/or importation of the following additional printheads (and printers/cartridges using such printheads):** In addition to those products specifically identified above, other printheads (or products containing a printhead) including a chip having at least two ink vias having a column of heater actuators on each side of the vias and a single temperature sensing element adjacent and substantially parallel to each column of heater actuators.

I. Canon U.S.A. Processes Infringing '708 Patent Claims 11 and 12 (Ex. 2).

1. **Manufacture and/or importation of the following Maxify and Pixma Printers:** Maxify iX6820, Pixma Pro-200.
2. **Manufacture and/or importation of the following printheads containing the following die part numbers (and printers/cartridges using such printheads):** LQ4390 (including LQ4390A), LQ4350.
3. **Manufacture and/or importation of the following additional printheads (and printers/cartridges using such printheads):** In addition to those products specifically identified above, other printheads (or products containing a printhead) including a chip having at least two ink vias having a column of heater actuators on each side of the vias and a single temperature sensing resistor or thermal sense resistor adjacent and substantially parallel to each column of heater actuators.

J. CSA Products Infringing '708 Patent Claims 1, 5, and 6 (Ex. 2).

1. **Large Format printers/printheads:** PF-10 printheads and printers using PF-10 printheads, including imagePROGRAF PRO-1000, PRO-2000, PRO-2100, PRO-4000, PRO-4000S, PRO-4100, PRO-4100S, PRO-6000, PRO-6000S, PRO-6100, and PRO-6100S large format inkjet printers.
2. **Additional printheads (and printers/cartridges using such printheads):** In addition to those products specifically identified above, other printheads (or products containing a printhead) including a chip having at least two ink vias having a column of heater actuators on each side of the vias and a single temperature sensing element adjacent and substantially parallel to each column of heater actuators.

K. CSA Processes Infringing '708 Patent Claims 9, 10, 14, and 15 (Ex. 2).

1. **Manufacture and/or importation of the following Large Format printers/printheads:** PF-10 printheads and printers using PF-10 printheads, including imagePROGRAF PRO-1000, PRO-2000, PRO-2100, PRO-4000, PRO-4000S, PRO-4100, PRO-4100S, PRO-6000, PRO-6000S, PRO-6100, and PRO-6100S large format inkjet printers.
2. **Manufacture and/or importation of the following additional printheads (and printers/cartridges using such printheads):** In addition to those products specifically identified above, other printheads (or products containing a printhead) including a chip having at least two ink vias having a column of heater actuators on each side of the vias and a single temperature sensing element adjacent and substantially parallel to each column of heater actuators.

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L. Canon U.S.A. Products Infringing ’864 Patent Claims 1, 2, 4, 5, 6, 8, 10, 11, 12, 13, 14, and 17 (Ex. 3).

1. **Maxify Printers:** Maxify GX6020, Maxify GX7020, Maxify iB4020, Maxify iB4120, Maxify iX6820, Maxify MB2020, Maxify MB2120, Maxify MB2320, Maxify MB2720, Maxify MB5020, Maxify MB5120, Maxify MB5320, and Maxify MB5420.
2. **Pixma Printers:** Pixma Pro-200, Pixma G1200, Pixma G1220, Pixma G2200, Pixma G2260, Pixma G3200, Pixma G3202, Pixma G3260, Pixma G4210, Pixma G5020, Pixma G6020, Pixma G7020, Pixma MG2120, Pixma MG2220, Pixma MG2420, Pixma MG2522, Pixma MG2525, Pixma MG2920, Pixma MG2922, Pixma MG2924, Pixma MG3020, Pixma MG3022, Pixma MG3120, Pixma MG3122, Pixma MG3220, Pixma MG3222, Pixma MG3520, Pixma MG3522, Pixma MG3620, Pixma MG4120, Pixma MG4220, Pixma MX320, Pixma MX330, Pixma MX340, Pixma MX350, Pixma MX360, Pixma MX372, Pixma MX392, Pixma MX410, Pixma MX420, Pixma MX432, Pixma MX439, Pixma MX452, Pixma MX459, Pixma MX472, Pixma MX479, Pixma MX490, Pixma MX492, Pixma MX512, Pixma MX522, Pixma MX532, Pixma TR4520, Pixma TR4522, Pixma TR7020, Pixma TR7022, Pixma TS202, Pixma TS302, Pixma TS3120, Pixma TS3122, Pixma TS3320, Pixma TS3322, Pixma TS5120, Pixma TS5320, Pixma TS6420, Pixma TS8020, Pixma TS8120, Pixma TS8220, Pixma TS8320, Pixma TS8322, Pixma TS9020, Pixma TS9120, Pixma iP100, Pixma iP110, Pixma iP2700, Pixma iP2702, and Pixma iP2820.

3. **Ink cartridges:** CL-211, CL-211XL, CL-241, CL-241XL, CL-244, CL-244XL, CL-246, CL-246XL, CL-261, CL-261XL, PG-210, PG-240, PG-240XL, PG-243, PG-243-XL, PG-245, PG-245XL, PG-260, and PG-260XL.
4. **Printheads containing the following die part numbers (and printers/cartridges using such printheads):** KF6-4694, LQ4220, LQ4300, LQ4350, LQ4390, LQ4500 (Including LQ4500A and LQ4500A-23), LQ4550, LQ4550A, LQ4590, LQ4640, LQ4670, LQ4760, and LQ4780 (including LQ4780-13).
5. **Large Format printers/printheads:** PF-10 printheads and printers using PF-10 printheads, including imagePROGRAF PRO-1000, PRO-2000, PRO-2100, PRO-4000, PRO-4000S, PRO-4100, PRO-4100S, PRO-6000, PRO-6000S, PRO-6100, and PRO-6100S large format inkjet printers.
6. **Additional printheads (and printers/cartridges using such printheads):** In addition to those products specifically identified above, other printheads (or products containing a printhead) having at least one bond pad connecting to heaters positioned on opposing sides of an ink via.

M. Canon U.S.A. Products Infringing '864 Patent Claims 3 and 15 (Ex. 3).

1. **Pixma Printers:** Pixma TR7020, Pixma TR7022, TS5320, and Pixma TS6420.
2. **Ink cartridges:** CL-261 and CL-261XL.
3. **Printheads containing the following die part numbers (and printers/cartridges using such printheads):** LQ4780 (including LQ4780-13).
4. **Additional printheads (and printers/cartridges using such printheads):** In addition to those products specifically identified above, other printheads (or

products containing a printhead) having at least one bond pad connecting to heaters positioned on opposing sides of an ink via by power traces that are physically separated proximal to the bondpad.

N. Canon U.S.A. Products Infringing ’864 Patent Claims 16, 19, and 20 (Ex. 3).

7. **Maxify Printers:** Maxify GX6020, Maxify GX7020, Maxify iB4020, Maxify iB4120, Maxify MB2020, Maxify MB2120, Maxify MB2320, Maxify MB2720, Maxify MB5020, Maxify MB5120, Maxify MB5320, and Maxify MB5420.
8. **Printheads containing the following die part numbers (and printers/cartridges using such printheads):** LQ4550 (including LQ4550A).
9. **Large Format printers/printheads:** PF-10 printheads and printers using PF-10 printheads, including imagePROGRAF PRO-1000, PRO-2000, PRO-2100, PRO-4000, PRO-4000S, PRO-4100, PRO-4100S, PRO-6000, PRO-6000S, PRO-6100, and PRO-6100S large format inkjet printers.
10. **Additional printheads (and printers/cartridges using such printheads):** In addition to those products specifically identified above, other printheads (or products containing a printhead) having at least eight heater arrays arranged in four pairs, each pair comprising two arrays on opposite sides of an ink via, each pair connected to the same bond pad.

O. CSA Products Infringing ’864 Patent Claims 1, 2, 4, 5, 6, 8, 10, 11, 12, 13, 14, 16, 17, 19, and 20 (Ex. 3).

1. **Large Format printers/printheads:** PF-10 printheads and printers using PF-10 printheads, including imagePROGRAF PRO-1000, PRO-2000, PRO-2100, PRO-

4000, PRO-4000S, PRO-4100, PRO-4100S, PRO-6000, PRO-6000S, PRO-6100, and PRO-6100S large format inkjet printers.

2. **Additional printheads (and printers/cartridges using such printheads):** In addition to those products specifically identified above, other printheads (or products containing a printhead) having at least one bond pad connecting to heaters positioned on opposing sides of an ink via.

Respectfully submitted,

Date: August 18, 2022

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CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2022, I served a copy of the foregoing DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS by electronic mail to the following recipients:

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