

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PPC BROADBAND, INC.,

Plaintiff,

v.

CHARLES INDUSTRIES, LLC and
AMPHENOL CORPORATION,

Defendants.

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C.A. No. 22-1517-GBW

PLAINTIFF’S INFRINGEMENT CONTENTIONS

Pursuant to the Scheduling Order (D.I. 22), Plaintiff PPC Broadband, Inc. (“PPC”) provides its Infringement Contentions against Defendants Charles Industries, LLC (“Charles”) and Amphenol Corporation (“Amphenol”) (collectively, “Defendants”). These disclosures and contentions are made with respect to United States Patent No. 9,008,483 (the “Patent-in-Suit”).

(a) Reservation of Rights

The investigation of facts and information concerning PPC’s claims is ongoing, and, therefore, this disclosure is not intended as an admission or representation that additional or different infringement contentions, accused products, facts, or information do not exist. These Infringement Contentions are necessarily preliminary and provide notice of the currently asserted patent claims and of where each element of each asserted claim is found within each Accused Instrumentality, but do not undertake to include all evidence that may support such assertions, which is reserved for trial following further analysis, fact discovery, claim construction, and expert discovery. These contentions may require subsequent amendment, alteration, or supplementation, as neither claim construction proceedings nor substantial completion of discovery has occurred.

PPC reserves the right to supplement these Infringement Contentions, including the

asserted claims and list of accused products, based upon further discovery. Further, PPC may amend or supplement any of these disclosures and contentions in view of any claim construction ruling(s) by the Court, or any position taken by Defendants, including information provided by Defendants concerning its invalidity and noninfringement allegations, theories, contentions, or facts supporting them.

These contentions do not indicate PPC's position with regard to the proper claim construction of any term of the Patent-in-Suit. PPC has made reasonable assumptions, to the extent necessary and appropriate, with respect to the meaning of patent claim terms for the purpose of preparing these contentions. PPC's Infringement Contentions are not, and should not be construed as, an endorsement or acceptance by PPC of any claim interpretations. PPC reserves the right to rely upon different meanings in the conduct of this litigation and to assert different meanings as appropriate in connection with any *Markman* procedures and proceedings or applicable meanings agreed to by the parties. PPC further reserves the right to update, amend, or supplement these contentions as prompted by discovery or following a *Markman* opinion adopting meanings that differ from those assumed by PPC or any other judicial clarification or alteration of the meaning of claim terms, and/or as otherwise authorized or permitted by the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware, the Federal Rules of Civil Procedure, and this Court's Orders.

Where PPC cites to a particular figure in a reference document, the citation should be understood to encompass the caption and description of the figure and any text relating to the figure in addition to the figure itself. Conversely, where recited portion of text refers or relates to a figure, the citation should be understood to include the figure as well. Citation to and inclusion of a figure or text of a document or photograph or other reference is meant to be and should be

understood as a demonstrative illustration for exemplary purposes only, and not exclusive of other examples from the same or other documents, and, therefore, not inclusive of all evidence PPC may use as proof at trial after further analysis and discovery, claim construction proceedings, and expert discovery.

PPC, for all the foregoing reasons, therefore expressly reserves the right to amend or supplement its identification of asserted claims, accused instrumentalities, and priority dates, as well as its claim charts, based on further investigation and discovery. All of these disclosures and the accompanying appendices are made subject to and without limiting any of the foregoing reservation of rights.

(b) Asserted Claims

At present, claims 1, 2, and 10-13 of the Patent-in-Suit are alleged to be infringed by Defendants under 35 U.S.C. § 271(a).

(c) Accused Products

At present, based on reasonable diligence, PPC identifies Defendants' CFIT-Flex™ Series of fiber enclosure products with swing-out bulkhead, including but not limited to products commercialized using model numbers beginning with the prefix "CFIT-FC" and such as the following exemplary model numbers:

- CFIT-FC24A2KK01
- CFIT-FC24B2KK01
- CFIT-FC24C2KK01
- CFIT-FC24D2KK01
- CFIT-FC24A2BD01

PPC also identifies Defendants' Flex™ Series of fiber enclosure products with swing-out bulkhead, including but not limited to products commercialized using model numbers beginning with the prefix "FCH" such as the following exemplary model numbers:

- FCH-32XXLLX
- FCH-32XXLLA
- FCH-32XXLLB
- FCH-32XXLLC
- FCH-32X3LLX
- FCH-32X3LLA
- FCH-32X3LLB
- FCH-32X3LLC

(together the “Accused Instrumentalities”).

Attached hereto as Appendices A through B are claim charts showing how the identified Accused Instrumentalities meet each element of the asserted claims of the Patent-in-Suit:

- Appendix A – CFIT-FC
- Appendix B – FCH

The Accused Instrumentalities may also include any product: i) that is identified in PPC’s Complaint (and the allegations of the Complaint are hereby incorporated by reference), ii) that Defendants identify in response to PPC’s interrogatories, iii) that are otherwise identified through discovery, and iv) that is a reasonably similar product of Defendants.

At present, PPC contends that each of the Accused Instrumentalities literally infringes each limitation of each asserted claim as identified in Section (b) above. To the extent any claim limitation is not found to be literally present in any of the Accused Instrumentalities, PPC contends that the limitation is met under the doctrine of equivalents. For each such claim limitation, a person of ordinary skill in the art at the time of the claimed invention would have found no more than insubstantial differences between the claim limitation and the Accused Instrumentality.

These disclosures are made on information and belief, and are based on the facts reasonably available to PPC at this time, following an inquiry that was reasonable under the circumstances. Defendants has not yet provided its full disclosures, document production, or interrogatory responses. Nor has it produced complete information (*e.g.*, schematics, service manuals, product

requirement documents, or other technical documentation) regarding the structure or operation of the accused products, as well as other of its products that potentially infringe the Patent-in-Suit, including those for which publicly available information was sparse or not readily available.

Defendants may also be infringing the asserted claims of the Patent-in-Suit by making, using, selling, offering for sale, or importing (whether alone or in concert with others) other unidentified, reasonably similar, or complementary devices or products. For example, certain potentially infringing devices may have had insufficient publicly available information to permit PPC to identify them as accused products. To the extent such other products (or Defendants' associated activities) infringe the asserted claims of the Patent-in-Suit in substantially the same manner as set forth in the attached claim charts, PPC asserts that Defendants infringes the Patent-in-Suit in connection with those products (and associated activities) as well.

PPC thus reserves the right to supplement, amend, or alter these disclosures consistent with Rule 26(e) of the Federal Rules of Civil Procedure and the Local Rules of this Court, including to identify additional infringing products identified during discovery.

(d) Priority Dates for Asserted Claims

Each of the asserted claims of the Patent-in-Suit is entitled to a priority date of no later than April 5, 2011.

Dated: June 30, 2023

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 30, 2023, a copy of the foregoing document was served on the counsel listed below in the manner indicated:

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Exhibit A

**Claim Chart Comparing the Charles CFIT-Flex™ Compact Universal Enclosure to
U.S. Patent No. 9,008,483**

The '483 Patent Claims 1, 2, and 10-13	CFIT-Flex™ Compact Universal Enclosure
1. A drop interface box configured to be mounted to a structure and to receive a drop cable from an optical fiber service provider distribution point and a plurality of distribution cables which distribute the optical fiber service, the drop interface box comprising:	The CFIT-Flex™ line of fiber enclosures (“CFIT-Flex”) are drop interface boxes configured to be mounted to a structure and to receive a drop cable from an optical fiber service provider distribution point and a plurality of distribution cables which distribute the optical fiber service, as depicted below: <i>A drop interface box</i> <i>configured to be mounted to a structure</i> <i>and to receive a drop cable from an optical fiber service provider distribution point</i> <i>and a plurality of distribution cables which distribute the optical fiber service</i> CFIT-Flex Compact Enclosure with Universal Backplane (CI_AC_0000011) The CFIT-Flex “may be wall, pole, strand, or pedestal mounted and configured to meet a variety of fiber, copper or coaxial distribution applications.” (CI_AC_0000010) “The CFIT-Flex Compact enclosure is designed to be flexibly configured to the unique requirements of any fiber optic, copper or coaxial distribution point of up to 24 subscribers.” (CI_AC_0000011; <i>see also</i> CI_AC_0000014, CI_AC_0000021–22) Referring to 4, “[m]olded-in wall/pole mount brackets for bolting to wood, masonry, drywall.” (CI_AC_0000011)

The '483 Patent Claims 1, 2, and 10-13	CFIT-Flex™ Compact Universal Enclosure
	<i>Interchangeable Cable Port Plates & Variable Entry Grommets</i> (CI_AC_0000011) Referring to 9, “[i]nterchangeable and removable bottom cable port plates with variable entry grommets maximize cable entrance/exit and support a wide variety of cable sizes while maintaining the enclosure’s environmental protection integrity.” (CI_AC_0000011) (CI_AC_0000011) Referring to 10, “[s]wing-out 24-port fiber bulkhead provides easy access to feed and drop cable as well as bend radius control and strain relief.” (CI_AC_0000011)

a base unit having a drop cable entrance configured to receive the drop cable and having drop cable retaining mechanisms spaced apart and configured to retain a length of drop cable looped around the drop cable retaining mechanisms;

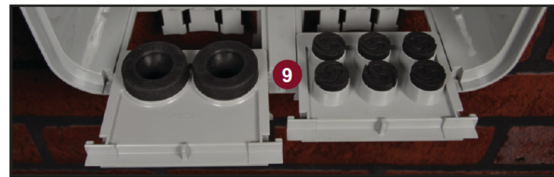
The CFIT-Flex includes a base unit having a drop cable entrance configured to receive the drop cable and having drop cable retaining mechanisms spaced apart and configured to retain a length of drop cable looped around the drop cable retaining mechanisms, as depicted below:



the drop interface box comprising: a base unit having a drop cable entrance configured to receive the drop cable and

having drop cable retaining mechanisms spaced apart and configured to retain a length of drop cable looped around the drop cable retaining mechanisms

(PPC_CI000318)



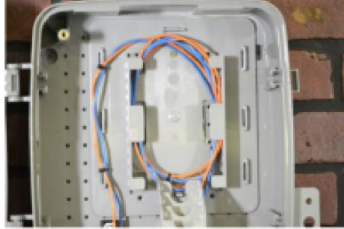
Interchangeable Cable Port Plates & Variable Entry Grommets

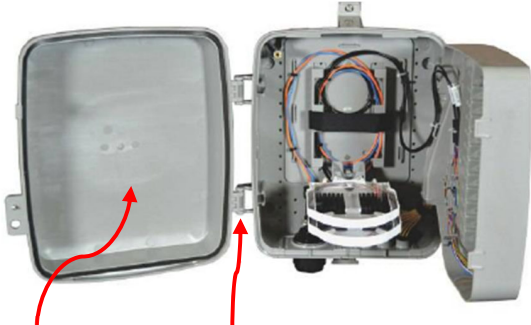
(CI_AC_0000011)

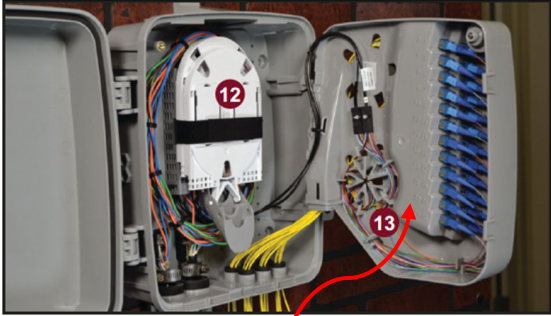
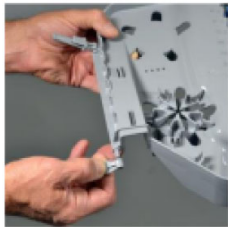
Referring to 9, “[i]nterchangeable and removable bottom cable port plates with variable entry grommets maximize cable entrance/exit and support a wide variety of cable sizes while maintaining the enclosure's environmental protection integrity.” (CI_AC_0000011; see also CI_AC_0000014)



Figure 10
Routing Feed Cable Through Port Plate

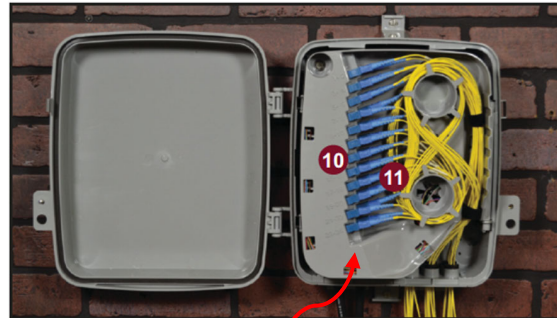
The '483 Patent Claims 1, 2, and 10-13	CFIT-Flex™ Compact Universal Enclosure
	(CI_AC_0000017) “Route the feed cable through the port plate.” (CI_AC_0000017)  Figure 15 Routing Buffer Tubes  Figure 16 Complete Buffer Tube Routing (CI_AC_0000018) “Route the buffer tubes on the left side of the fiber storage basket and into the top of the basket, securing them with a cable tie to the inside of the basket. Typically, two loops of buffer tube slack are stored.” (CI_AC_0000018)

The '483 Patent Claims 1, 2, and 10-13	CFIT-Flex™ Compact Universal Enclosure
a cover having a hinged connection to the base unit to selectively enclose a storage area provided in the base unit; and	The CFIT-Flex includes a cover having a hinged connection to the base unit to selectively enclose a storage area provided in the base unit, as depicted below:  <i>a cover having a hinged connection to the base unit to selectively enclose a storage area provided in the base unit</i> (PPC_CI000318.)  Figure 1 Opening Outer Door (CI_AC_0000016) “Using a 216-tool or can wrench. turn the two bolts counterclockwise (CCW) to open the door.” (CI_AC_0000016)

The '483 Patent Claims 1, 2, and 10-13	CFIT-Flex™ Compact Universal Enclosure
a fiber storage panel having a hinged connection to the base unit on a side opposite the hinged connection of the cover to the base unit	The CFIT-Flex includes a fiber storage panel having a hinged connection to the base unit on a side opposite the hinged connection of the cover to the base unit, as depicted below:  <i>Optional Swing-Out Fiber Bulkhead (Feed Side)</i> <i>a fiber storage panel having a hinged connection to the base unit on a side opposite the hinged connection of the cover to the base unit</i> (CI_AC_0000011)  Figure 34 Attaching Snap Hinges onto Bulkhead Pins (CI_AC_0000021)  Figure 35 Inserting Snap Hinges into Base Slots “Attach the snap hinges onto the bulkhead pins. ... Insert snap hinge into base slots until they snap into place.” (CI_AC_0000021)

such that the fiber storage panel is moveable relative to the base unit and configured to be stored between the base unit and the cover,

The CFIT-Flex includes that the fiber storage panel is moveable relative to the base unit and configured to be stored between the base unit and the cover, as depicted below:



Optional Swing-Out Fiber Bulkhead (Drop Side)

such that the fiber storage panel is moveable relative to the base unit and configured to be stored between the base unit and the cover,

(CI_AC_0000011)



Figure 2
Opening Bulkhead

(CI_AC_0000016)

“If the bulkhead is installed, use the can wrench to open the bulkhead.” (CI_AC_0000016)

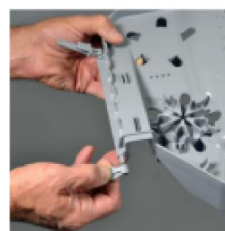


Figure 34
Attaching Snap Hinges onto Bulkhead Pins

(CI_AC_0000021)

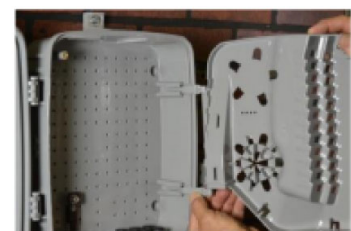
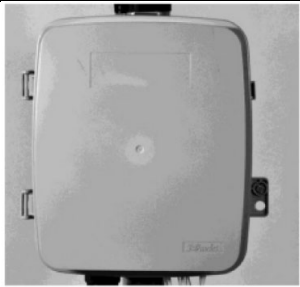
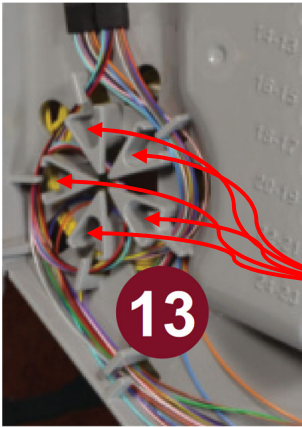
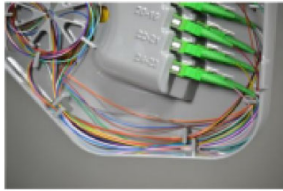
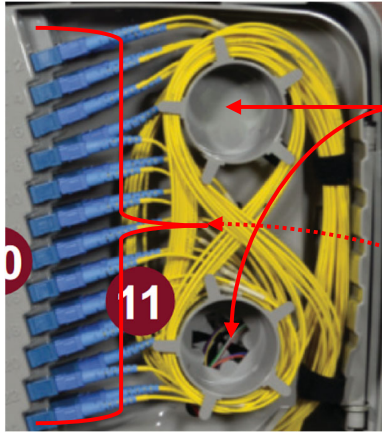
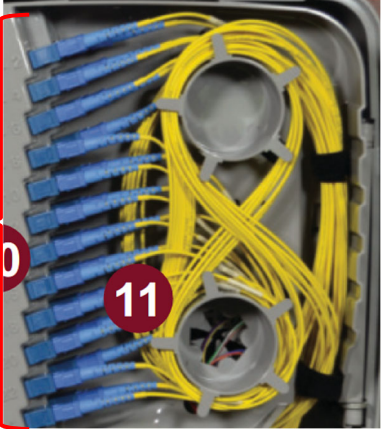


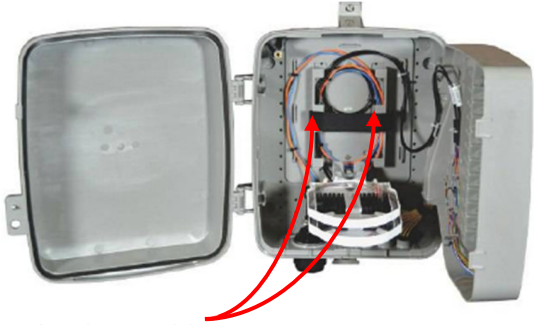
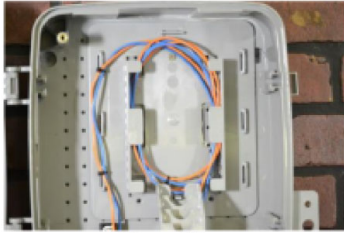
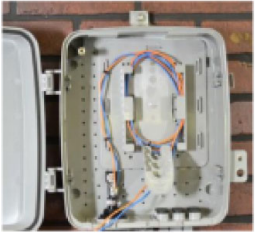
Figure 35
Inserting Snap Hinges into Base Slots

“Attach the snap hinges onto the bulkhead pins. ... Insert snap hinge into base slots until they snap into place.” (CI_AC_0000021)

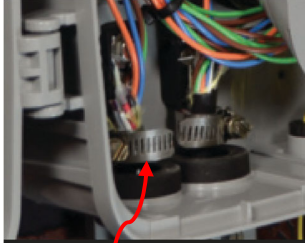
The '483 Patent Claims 1, 2, and 10-13	CFIT-Flex™ Compact Universal Enclosure
	 (CI_AC_0000022)
the fiber storage panel having first spools positioned to store a plurality of feed break-out cables coupleable to the drop cable,	The CFIT-Flex includes the fiber storage panel having first spools positioned to store a plurality of feed break-out cables coupleable to the drop cable, as depicted below:  <i>the fiber storage panel having first spools positioned to store a plurality of feed break-out cables coupleable to the drop cable,</i> (CI_AC_0000011) “Overview – when fallouts are used in conjunction with a cable stub, they extend from the assigned bulkhead adapter panel locations to the splice tray.”(CI_AC_0000020)  Figure 31 Routing Fibers Through Bend Control  Figure 32 Routing Fibers to Bulkhead Locations (CI_AC_0000020) “The 900 micron fibers are routed through the built-in bend controls. Following standard color code, continue muting all 900 micron fibers to their corresponding bulkhead locations.” (CI_AC_0000020)

The '483 Patent Claims 1, 2, and 10-13	CFIT-Flex™ Compact Universal Enclosure
the fiber storage panel further having second spools positioned to store a plurality of distribution cables coupleable to the plurality of feed break-out cables.	The CFIT-Flex includes the fiber storage panel further having second spools positioned to store a plurality of distribution cables coupleable to the plurality of feed break-out cables, as depicted below:  <i>the fiber storage panel further having second spools positioned to store a plurality of distribution cables coupleable to the plurality of feed break-out cables</i> (CI_AC_0000011)  Figure 44 Drops Routed Around Bend Controls (CI_AC_0000022) “Route the drops around bend controls prior to installing connectors in the bulkhead.” (CI_AC_0000022)

The '483 Patent Claims 1, 2, and 10-13	CFIT-Flex™ Compact Universal Enclosure
2. The drop interface box of claim 1, wherein the fiber storage panel further includes an adapter bracket configured to hold one or more adapters which couple the plurality of feed break-out cables to the plurality of distribution cables.	The CFIT-Flex further includes an adapter bracket configured to hold one or more adapters which couple the plurality of feed break-out cables to the plurality of distribution cables, as depicted below. In the alternative, the CFIT-Flex includes a feature, depicted below, that is equivalent to the adapter bracket configured to hold one or more adapters, which performs substantially the same function as the claimed adapter bracket, in the same way, to achieve the same result. <i>the fiber storage panel further includes an adapter bracket configured to hold one or more adapters which couple the plurality of feed break-out cables to the plurality of distribution cables.</i>  (CI_AC_0000011)  Figure 44 Drops Routed Around Bend Controls (CI_AC_0000022) “Route the drops around bend controls prior to installing connectors in the bulkhead.” (CI_AC_0000022)

The '483 Patent Claims 1, 2, and 10-13	CFIT-Flex™ Compact Universal Enclosure
10. The drop interface box of claim 1, wherein the drop cable retaining mechanisms in the base unit comprise storage clips positioned on opposing sides of the base unit.	The CFIT-Flex includes the drop cable retaining mechanisms in the base unit comprising storage clips positioned on opposing sides of the base unit, as depicted below:  <i>the drop cable retaining mechanisms in the base unit comprise storage clips positioned on opposing sides of the base unit.</i> (PPC_CI000318)  Figure 15 Routing Buffer Tubes  Figure 16 Complete Buffer Tube Routing (CI_AC_0000018) “Route the buffer tubes on the left side of the fiber storage basket and into the top of the basket, securing them with a cable tie to the inside of the basket. Typically, two loops of buffer tube slack are stored.” (CI_AC_0000018)

The '483 Patent Claims 1, 2, and 10-13	CFIT-Flex™ Compact Universal Enclosure
11. The drop interface box of claim 1, wherein the drop cable entrance further comprises slots formed in the base unit and configured to receive a cable clip which clips over the drop cable, the slots and the cable clip forming a substantially weather tight seal with the base unit.	The CFIT-Flex includes the drop cable entrance further comprising slots formed in the base unit and configured to receive a cable clip which clips over the drop cable, the slots and the cable clip forming a substantially weather tight seal with the base unit , as depicted below. In the alternative, the CFIT-Flex includes a feature that is equivalent to the cable clip, which performs substantially the same function as the claimed cable clip, in the same way, to achieve the same result. <i>Interchangeable Cable Port Plates & Variable Entry Grommets</i> <i>the drop cable entrance further comprises slots formed in the base unit and configured to receive a cable clip which clips over the drop cable, the slots and the cable clip forming a substantially weather tight seal with the base unit.</i> (CI_AC_0000011) Referring to 9, “[i]nterchangeable and removable bottom cable port plates with variable entry grommets maximize cable entrance/exit and support a wide variety of cable sizes while maintaining the enclosure's environmental protection integrity.” (CI_AC_0000011; see also CI_AC_0000014)

The '483 Patent Claims 1, 2, and 10-13	CFIT-Flex™ Compact Universal Enclosure
12. The drop interface box of claim 11, and further comprising a strain-relief clamp coupled to the base unit proximate the drop cable entrance.	The CFIT-Flex further includes a strain-relief clamp coupled to the base unit proximate the drop cable entrance, as depicted below:  <i>a strain-relief clamp coupled to the base unit proximate the drop cable entrance</i> (CI_AC_0000011)  Figure 14 Attaching Hose Clamp (CI_AC_0000017) “Secure the cable to the cable bracket with a hose clamp.” (CI_AC_0000017)

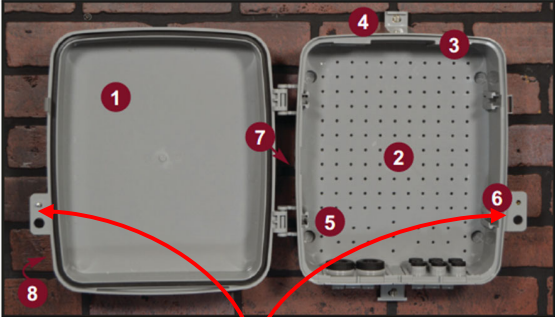
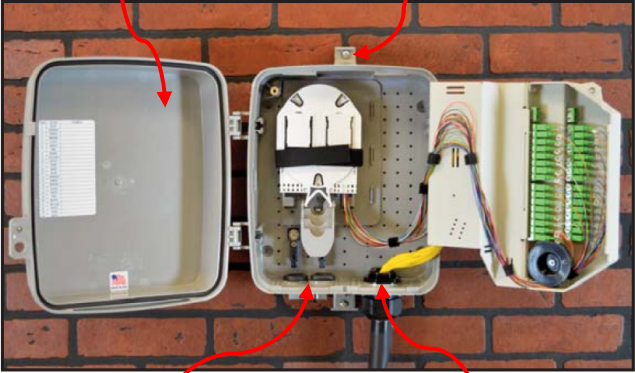
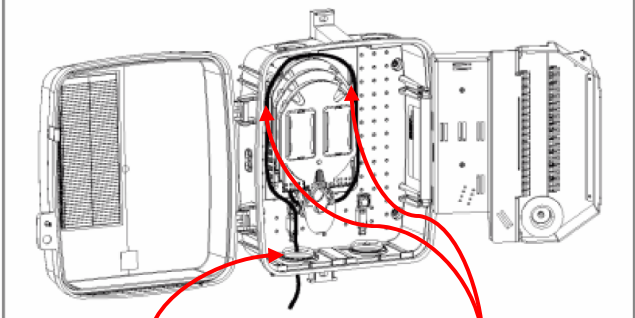
The '483 Patent Claims 1, 2, and 10-13	CFIT-Flex™ Compact Universal Enclosure
13. The drop interface box of claim 1, and further comprising a security mechanism for securing the cover to the base unit in a closed position.	The CFIT-Flex further includes a security mechanism for securing the cover to the base unit in a closed position, as depicted below:  <i>CFIT-Flex Compact Enclosure with Universal Backplane</i> <i>a security mechanism for securing the cover to the base unit in a closed position.</i> (CI_AC_0000011) Referring to 6, “216-tool lockable door with a padlock hasp for enhanced security.” (CI_AC_0000011; see also CI_AC_0000014)

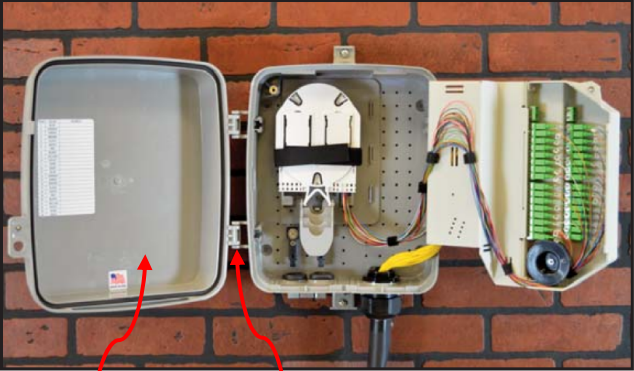
Exhibit B

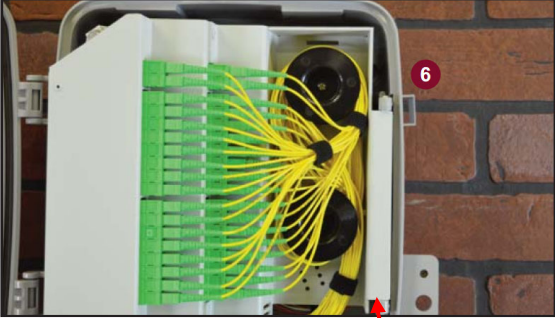
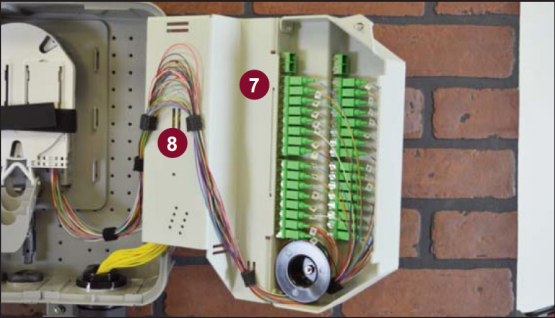
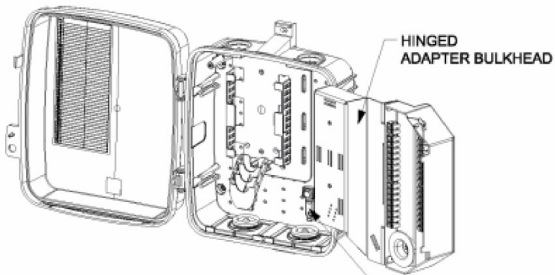
**Claim Chart Comparing the Charles Flex™ Compact Hub Enclosure to
U.S. Patent No. 9,008,483**

The '483 Patent Claims 1, 2, and 10-13	Flex™ Compact Hub Enclosure
1. A drop interface box configured to be mounted to a structure and to receive a drop cable from an optical fiber service provider distribution point and a plurality of distribution cables which distribute the optical fiber service, the drop interface box comprising:	The Flex™ Compact Hub line of fiber enclosures (“FCH”) are drop interface boxes configured to be mounted to a structure and to receive a drop cable from an optical fiber service provider distribution point and a plurality of distribution cables which distribute the optical fiber service, as depicted below: <i>A drop interface box</i> <i>configured to be mounted to a structure</i>  <i>Flex Compact Hub (32 Port) Enclosure*</i> <i>and to receive a drop cable from an optical fiber service provider distribution point</i> <i>and a plurality of distribution cables which distribute the optical fiber service</i> (PPC_CI000320) The FCH “may be wall or pole mounted and configured for low density Multi-Dwelling Unit (MDU) fiber distribution applications of up to 32 subscribers.” (PPC_CI000320; <i>see also</i> CI_AC_0000027) “The Flex Compact Hub enclosure is designed to be flexibly configured to the unique requirements of many different fiber optic distribution points..” (PPC_CI000321) “Molded-in wall/pole mount brackets for bolting to wood, masonry, drywall.” (PPC_CI000321)

The '483 Patent Claims 1, 2, and 10-13	Flex™ Compact Hub Enclosure
	<i>Removable Cable Entry Port Plates</i> (PPC_CI000321) Referring to 4, “[r]emovable cable entry port plates (left and right) each feature a 1” entry grommet to maximize cable entrance/exit while maintaining the enclosure’s environmental protection integrity.” (PPC_CI000321) <i>Swing-Out Fiber Bulkhead (Drop Side)</i> (PPC_CI000321) Referring to 6, “[s]wing-out fiber bulkhead with 36 SC/APC fiber adapters (4 feed / 32 distribution).” (PPC_CI000321) <i>Swing-Out Fiber Bulkhead (Feed Side)*</i> (PPC_CI000321) Referring to 7, “Fiber bulkhead provides easy access to feed and drop cable adapters as well as bend radius control and strain relief guides.” (PPC_CI000321)

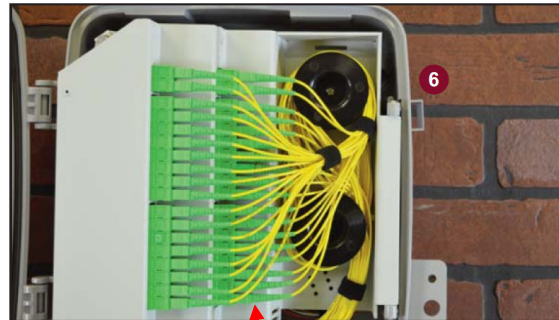
The '483 Patent Claims 1, 2, and 10-13	Flex™ Compact Hub Enclosure
a base unit having a drop cable entrance configured to receive the drop cable and having drop cable retaining mechanisms spaced apart and configured to retain a length of drop cable looped around the drop cable retaining mechanisms;	The FCH includes a base unit having a drop cable entrance configured to receive the drop cable and having drop cable retaining mechanisms spaced apart and configured to retain a length of drop cable looped around the drop cable retaining mechanisms, as depicted below:  Figure 7 Route Feed Buffer Tube to Tray <i>the drop interface box comprising: a base unit having a drop cable entrance configured to receive the drop cable and</i> <i>having drop cable retaining mechanisms spaced apart and configured to retain a length of drop cable looped around the drop cable retaining mechanisms</i> (CI_AC_0000028) “Feed fiber enters the FCH through the grommet on the bottom of the housing, on the left side. ... Route buffer tubing around the fiber basket, using Velcro to secure the buffer tube to the cable tie points Figure 7).” (CI_AC_0000028)  Removable Cable Entry Port Plates (PPC_CI000321) Referring to 4, “[r]emovable cable entry port plates (left and right) each feature a 1” entry grommet to maximize cable entrance/exit while maintaining the enclosure’s environmental protection integrity.” (PPC_CI000321)

The '483 Patent Claims 1, 2, and 10-13	Flex™ Compact Hub Enclosure
a cover having a hinged connection to the base unit to selectively enclose a storage area provided in the base unit; and	The FCH includes a cover having a hinged connection to the base unit to selectively enclose a storage area provided in the base unit, as depicted below:  <i>Flex Compact Hub (32 Port) Enclosure*</i> <i>a cover having a hinged connection to the base unit to selectively enclose a storage area provided in the base unit</i> (PPC_CI000320)

The '483 Patent Claims 1, 2, and 10-13	Flex™ Compact Hub Enclosure
a fiber storage panel having a hinged connection to the base unit on a side opposite the hinged connection of the cover to the base unit	The FCH includes a fiber storage panel having a hinged connection to the base unit on a side opposite the hinged connection of the cover to the base unit, as depicted below:  <i>Swing-Out Fiber Bulkhead (Drop Side)</i> <i>a fiber storage panel having a hinged connection to the base unit on a side opposite the hinged connection of the cover to the base unit</i> (PPC_CI000321) Referring to 6, “[s]wing-out fiber bulkhead with 36 SC/APC fiber adapters (4 feed / 32 distribution).” (PPC_CI000321)  <i>Swing-Out Fiber Bulkhead (Feed Side)*</i> (PPC_CI000321)  (CI_AC_0000026)

such that the fiber storage panel is moveable relative to the base unit and configured to be stored between the base unit and the cover,

The FCH includes that the fiber storage panel is moveable relative to the base unit and configured to be stored between the base unit and the cover, as depicted below:



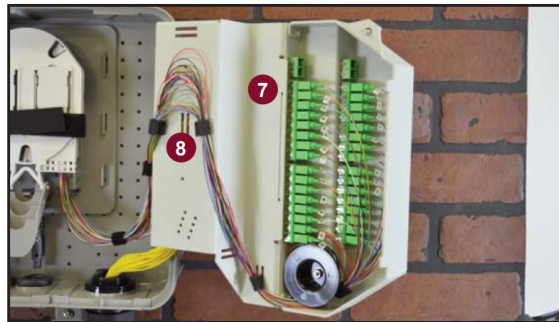
Swing-Out Fiber Bulkhead (Drop Side)

such that the fiber storage panel is moveable relative to the base unit and configured to be stored between the base unit and the cover,

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Referring to 6, “[s]wing-out fiber bulkhead with 36 SC/APC fiber adapters (4 feed / 32 distribution).”

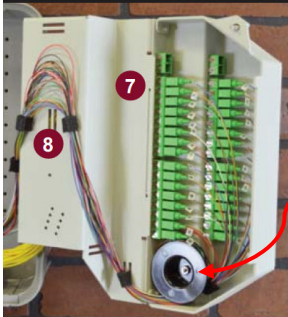
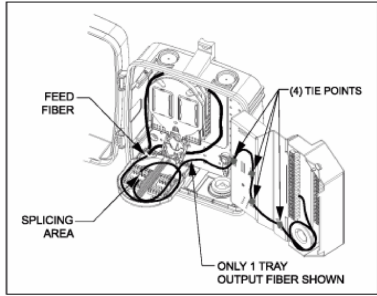
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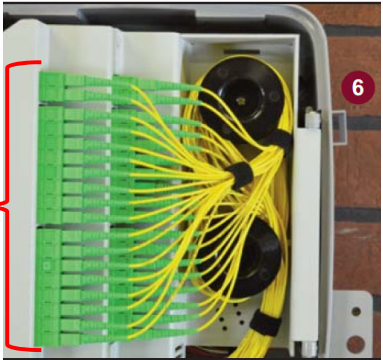
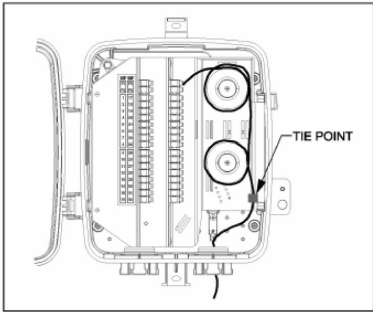
*Swing-Out Fiber Bulkhead (Feed Side)**

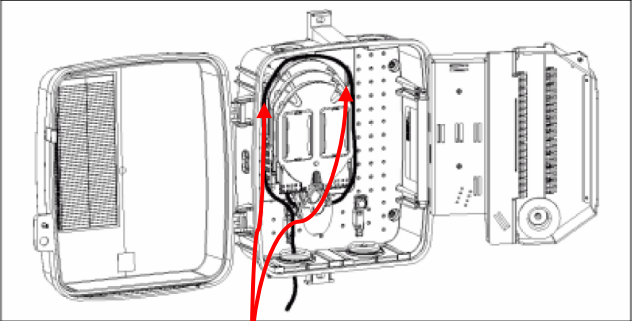
(PPC_CI000321)

The '483 Patent Claims 1, 2, and 10-13	Flex™ Compact Hub Enclosure
	 <i>Closed View</i> (PPC_CI000321)

The '483 Patent Claims 1, 2, and 10-13	Flex™ Compact Hub Enclosure
the fiber storage panel having first spools positioned to store a plurality of feed break-out cables coupleable to the drop cable,	The FCH includes the fiber storage panel having first spools positioned to store a plurality of feed break-out cables coupleable to the drop cable, as depicted below:  <i>the fiber storage panel having first spools positioned to store a plurality of feed break-out cables coupleable to the drop cable,</i> (PPC_CI000321)  Figure 8 Route Fiber to Adapter (CI_AC_0000029) “Route the connectorized tray output fibers out of the right side of the tray and across to the adapter ports in the bulkhead. Secure to the cable tie points using Velcro. Ensure that there is enough slack to open and close the hinged adapter bulkhead and that the fibers will not get pinched when the bulkhead is closed. ... Connect all feed fiber connectors to the adapters on the inside of the adapter bulkhead. ... Close the hinged adapter bulkhead. Note: the top two adapters on each row of the adapter bulkhead are intended for direct feed connections. Use these for connections that do not need to be muted through the trays.” (CI_AC_0000029)

The '483 Patent Claims 1, 2, and 10-13	Flex™ Compact Hub Enclosure
the fiber storage panel further having second spools positioned to store a plurality of distribution cables coupleable to the plurality of feed break-out cables.	The FCH includes the fiber storage panel further having second spools positioned to store a plurality of distribution cables coupleable to the plurality of feed break-out cables, as depicted below: <i>the fiber storage panel further having second spools positioned to store a plurality of distribution cables coupleable to the plurality of feed break-out cables</i> (PPC_CI000321) Figure 9 Route Drop Fiber to Adapter (CI_AC_0000029) “Route drop cable around the cable grooming spools and secure to the tie points with Velcro. ... Connect the cables to the adapters on the drop side of the adapter bulkhead (Figure 9).” (CI_AC_0000029)

The '483 Patent Claims 1, 2, and 10-13	Flex™ Compact Hub Enclosure
2. The drop interface box of claim 1, wherein the fiber storage panel further includes an adapter bracket configured to hold one or more adapters which couple the plurality of feed break-out cables to the plurality of distribution cables.	The FCH further includes an adapter bracket configured to hold one or more adapters which couple the plurality of feed break-out cables to the plurality of distribution cables, as depicted below. In the alternative, the FCH includes a feature, depicted below, that is equivalent to the adapter bracket configured to hold one or more adapters, which performs substantially the same function as the claimed adapter bracket, in the same way, to achieve the same result. <i>the fiber storage panel further includes an adapter bracket configured to hold one or more adapters which couple the plurality of feed break-out cables to the plurality of distribution cables.</i>  (PPC_CI000321)  Figure 9 Route Drop Fiber to Adapter (CI_AC_0000029) “Route drop cable around the cable grooming spools and secure to the tie points with Velcro. ... Connect the cables to the adapters on the drop side of the adapter bulkhead (Figure 9).” (CI_AC_0000029)

The '483 Patent Claims 1, 2, and 10-13	Flex™ Compact Hub Enclosure
10. The drop interface box of claim 1, wherein the drop cable retaining mechanisms in the base unit comprise storage clips positioned on opposing sides of the base unit.	The FCH includes the drop cable retaining mechanisms in the base unit comprising storage clips positioned on opposing sides of the base unit, as depicted below:  Figure 7 Route Feed Buffer Tube to Tray <i>the drop cable retaining mechanisms in the base unit comprise storage clips positioned on opposing sides of the base unit.</i> (CI_ AC_0000028) “Feed fiber enters the FCH through the grommet on the bottom of the housing, on the left side. ... Route buffer tubing around the fiber basket, using Velcro to secure the buffer tube to the cable tie points Figure 7).” (CI_ AC_0000028)

11. The drop interface box of claim 1, wherein the drop cable entrance further comprises slots formed in the base unit and configured to receive a cable clip which clips over the drop cable, the slots and the cable clip forming a substantially weather tight seal with the base unit.

The FCH includes the drop cable entrance further comprising slots formed in the base unit and configured to receive a cable clip which clips over the drop cable, the slots and the cable clip forming a substantially weather tight seal with the base unit, as depicted below. In the alternative, the FCH includes a feature that is equivalent to the cable clip, which performs substantially the same function as the claimed cable clip, in the same way, to achieve the same result.



Removable Cable Entry Port Plates

the drop cable entrance further comprises slots formed in the base unit and configured to receive a cable clip which clips over the drop cable, the slots and the cable clip forming a substantially weather tight seal with the base unit.

(PPC_CI000321)

Referring to 4, “[r]emovable cable entry port plates (left and right) each feature a 1” entry grommet to maximize cable entrance/exit while maintaining the enclosure’s environmental protection integrity.”

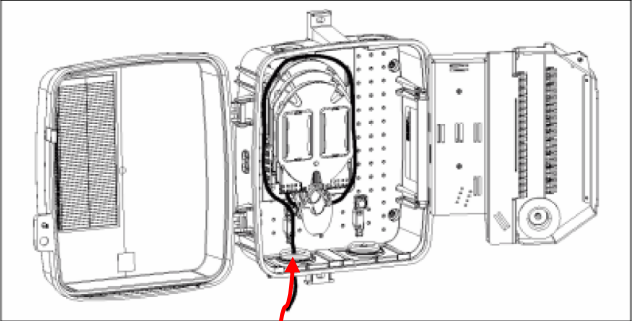
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(PPC_CI000322)

“The FCH32 Flex Compact Hub enclosure features two bottom cable entry port locations (left and right), each equipped with one 1” grommet for cable ingress/egress. Port plates slide out from the enclosure allowing technicians to easily place cables and perform maintenance. Plates lock into place to ensure integrity of the enclosure’s environmental protection, but can be easily unlocked and removed without tools by technicians.” (PPC_CI000322)

“Interchangeable, removable bottom ‘feed and drop’ cable port plates with variable entry grommets to maximize in/out flexibility while maintaining environmental protection integrity.” (CI_AC_0000024)

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12. The drop interface box of claim 11, and further comprising a strain-relief clamp coupled to the base unit proximate the drop cable entrance.	The FCH further includes a strain-relief clamp coupled to the base unit proximate the drop cable entrance, as depicted and described below:  Figure 7 Route Feed Buffer Tube to Tray <i>a strain-relief clamp coupled to the base unit proximate the drop cable entrance</i> (CI_AC_0000028) “Use a hose clamp to secure the cable to the cable attachment hardware inside the enclosure, just above the grommet.” (CI_AC_0000028)
13. The drop interface box of claim 1, and further comprising a security mechanism for securing the cover to the base unit in a closed position.	The FCH further includes a security mechanism for securing the cover to the base unit in a closed position, as depicted below:  Closed View <i>a security mechanism for securing the cover to the base unit in a closed position.</i> (PPC_CI000321) Referring to 5, “216-tool lockable door with a padlock hasp for enhanced security.” (PPC_CI000321; <i>see also</i> CI_AC_0000024 (“Hinged security door”))