

**CONTAINS CONFIDENTIAL BUSINESS INFORMATION
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Infringement Claim Chart for U.S. Patent No. 8,371,282 – Prime Time Toys Accused Products (“PTT Accused Products”)

This chart addresses the Prime Time Toys Hydro Strike Pulsar Pro and Nebula Pro products, which are representative of other Prime Time Toys (“PTT”) products, and any other similar projectile launcher and/or ammunition for use with such products (whether sold separately or with such a projectile launcher), and any kits or other products containing the same. As one non-limiting example, the below chart is representative of the ammunition sold as Item No. 8813-D (Gel-Tek Beads) and other variants, but which has not been produced, and any other product containing Gel-Tek ammunition or any other ammunition comprising SAP beads. Respondents in this case have not made a complete production of documents and discovery is continuing. In particular, the PTT Respondents have only produced 76 documents in this case to date, leaving unaddressed many of Complainants’ requests for production that are relevant to showing infringement. All PTT products that practice one of more claims of the asserted patents are Accused Products. All evidence cited below for a particular product is applicable, as appropriate, to other PTT products; the citation to evidence for one product is not intended to exclude the applicability of that evidence for another PTT product.

The projectile launcher and ammunition products practice the asserted claims of the patent-in-suit. Moreover, the PTT Respondents direct users of these products, including by providing instructions, to assemble the product in a manner than practices the patent-in-suit. Each of these products, including the super absorbent polymer ammunition products, is also especially made for use in practicing the patent-in-suit and is not a staple article or commodity of commerce suitable for substantial non-infringing use. Similarly, the PTT accessories identified in Hasbro’s interrogatory responses (e.g., replacement battery) also especially made for use in practicing the patent-in-suit and is not a staple article or commodity of commerce suitable for substantial non-infringing use.

No part of this exemplary chart construes, or is intended to construe, the claims, specification, or prosecution history of the patent-in-suit. The claims have not been construed. The following claims and claim limitations are satisfied literally and/or under the doctrine of equivalents unless specifically noted. This exemplary chart does not limit, and is not intended to limit, Complainants’ positions or contentions on claim construction, infringement, domestic industry, or validity. Further, Complainants reserve the right to rely on other claims and/or products to establish the technical prong of the domestic industry requirement or to establish infringement. This chart should not be construed as providing any positions on claim construction. The evidence cited to is exemplary and non-limiting. Where a single Bates number is provided that corresponds to the start of a multi-page document, the entire document is identified as supporting exemplary evidence. Complainants may further rely on fact and expert witness testimony, on additional documents identified during fact and expert discovery, and on expert reports to show that the PTT Accused Products meet any of the identified claim limitations. Complainants reserve the right to update its infringement contentions through discovery.

Claim No.	Infringement Evidence
Claim 1. [1.pre] Ammunition	PTT Accused Products comprise ammunition configured for use with a projectile launcher comprised of a plurality of soft-projectiles having the same shape, each soft projectile being formed from

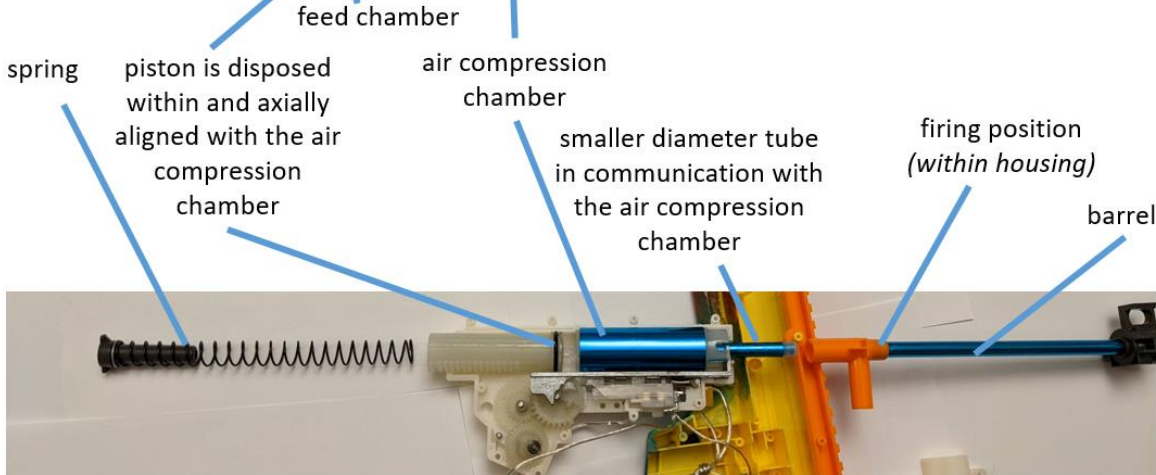
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Claim No.	Infringement Evidence
	Complainants may further rely on fact and expert witness testimony, on additional documents identified during fact and expert discovery, and on expert reports to show that the PTT Accused Products practice this element.
Claim 13. The projectile launcher of claim 8, wherein the super absorbent polymer has a cross linking density sufficient to prevent the soft-projectiles from breaking apart when launched from the projectile launcher.	PTT Accused Products comprise the projectile launcher of claim 8, wherein the super absorbent polymer has a cross linking density sufficient to prevent the soft-projectiles from breaking apart when launched from the projectile launcher. Complainants incorporate the evidence identified in claim 1 and 8. The Gel-Tek beads used in the PTT Accused Products are a cross-linked SAP called sodium polyacrylate. <i>See e.g.</i>, PTT00000011: 2. Sodium polyacrylate is an example of a super-absorbing polymer. It is a cross-linked (network) polymer that contains sodium atoms. It absorbs water by a process called osmosis. When the (sodium-containing) polymer is placed in contact with water, there is a tendency for the sodium to distribute equally between the network and the water. That means, some of the sodium atoms want to leave the network and move to the water. When these sodium atoms leave, they are replaced with water molecules. Water swells the polymer network to try to keep the sodium concentration balanced between the polymer and the water. The cross-links that connect the chains together prevent them from dissolving/breaking apart in the water. Sodium <i>See e.g.</i>, PTT00000012: <u>Current Sodium Polyacrylate and Green Pigment Bead Assessment</u> The cross linking density is sufficient to prevent the soft-projectiles from breaking apart when launched from the projectile launcher, in that the plurality of soft-projectiles do not break apart when launched from the projectile launcher. PTT PULSAR PRO (PTT00000002): See HASBRO-ITC-00006670-HASBRO-ITC-00006671 (showing ammunition launched from the projectile launcher without breaking apart).

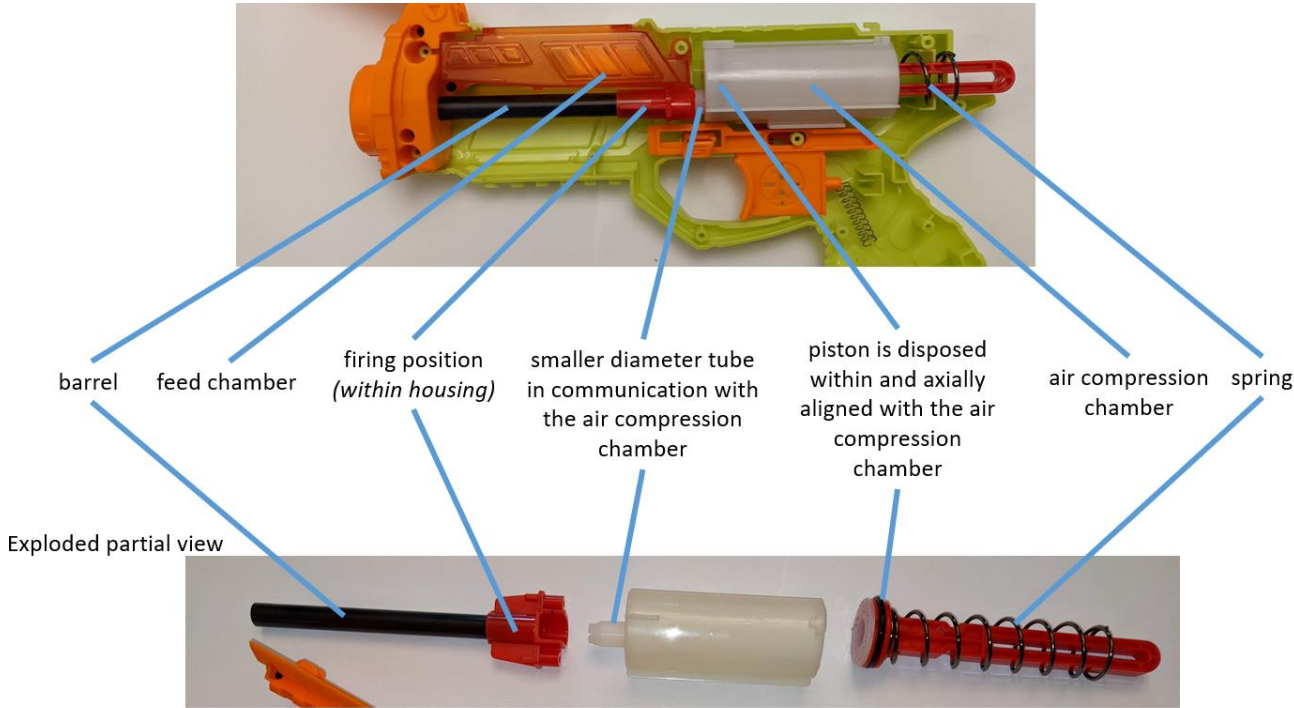
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Claim No.	Infringement Evidence
	PTT NEBULA PRO (PTT000000001): See HASBRO-ITC-00006968-HASBRO-ITC-00006969 (showing ammunition launched from the projectile launcher without breaking apart). Complainants may further rely on fact and expert witness testimony, on additional documents identified during fact and expert discovery, and on expert reports to show that the PTT Accused Products practice this element.
Claim 14. The projectile launcher of claim 8, wherein the projectile launcher is designed to use air pressure to launch the soft-projectiles.	PTT Accused Products comprise the projectile launcher of claim 8, wherein the super absorbent polymer has a cross linking density sufficient to prevent the soft-projectiles from breaking apart when launched from the projectile launcher. Complainants incorporate the evidence identified in claim 1 and 8. <i>See e.g.</i>, PTT PULSAR PRO (PTT000000002) is designed to use air pressure to launch the soft-projectiles:

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	  feed chamber spring piston is disposed within and axially aligned with the air compression chamber air compression chamber smaller diameter tube in communication with the air compression chamber firing position (within housing) barrel Exploded partial view

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Claim No.	Infringement Evidence
	PTT NEBULA PRO (PTT00000001) operates the same way as described above:  barrel feed chamber firing position (within housing) smaller diameter tube in communication with the air compression chamber piston is disposed within and axially aligned with the air compression chamber air compression chamber spring Exploded partial view Complainants may further rely on fact and expert witness testimony, on additional documents identified during fact and expert discovery, and on expert reports to show that the PTT Accused Products practice this element.
Claim 15. The projectile launcher of claim 8, further comprising a firing mechanism that stores	PTT Accused Products comprise the projectile launcher of claim 8, further comprising a firing mechanism that stores energy independent of a user. Complainants incorporate the evidence identified in claim 1 and 8.

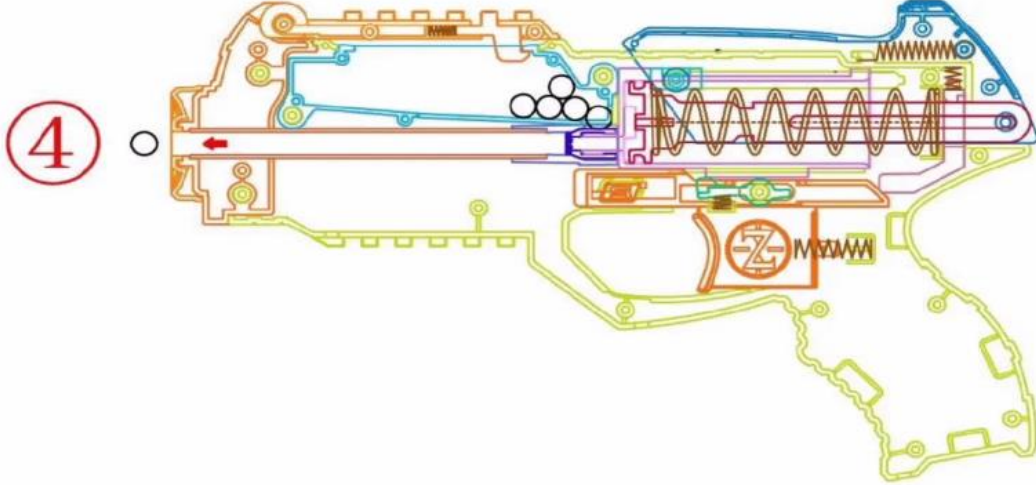
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Claim No.	Infringement Evidence
	Complainants may further rely on fact and expert witness testimony, on additional documents identified during fact and expert discovery, and on expert reports to show that the PTT Accused Products practice this element.
Claim 17. The projectile launcher of claim 8, further comprising a firing mechanism that directly applies a force to a soft-projectile located in the firing position to launch the soft-projectile from the projectile launcher in free flight.	PTT Accused Products comprise the projectile launcher of claim 8, further comprising a firing mechanism that directly applies a force to a soft-projectile located in the firing position to launch the soft-projectile from the projectile launcher in free flight. Complainants incorporate the evidence identified in claims 1 and 8. See e.g., PTT PULSAR PRO (PTT00000002): firing mechanism directly applies a force to the soft-projectile ammunition located in firing position (<i>in housing</i>) to launch the soft-projectile from the projectile launcher in free flight This is also depicted in PTT000000033:

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Claim No.	Infringement Evidence
	 PTT NEBULA PRO (PTT000000001):  firing mechanism directly applies a force to the soft-projectile ammunition located in firing position (<i>in housing</i>) to launch the soft-projectile from the projectile launcher in free flight This is also depicted in PTT000000031:

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Claim No.	Infringement Evidence
	 See also HASBRO-ITC-00006970-HASBRO-ITC-00006971(video of Pulsar); HASBRO-ITC-00006968-HASBRO-ITC-00006969 (video of Nebula). Complainants may further rely on fact and expert witness testimony, on additional documents identified during fact and expert discovery, and on expert reports to show that the PTT Accused Products practice this element.
Claim 19. [19.pre] The projectile launcher of claim 8, further comprising: [19.1] an air compression chamber; [19.2] a piston disposed within and axially aligned with the air	PTT Accused Products comprise the projectile launcher of claim 8, further comprising: an air compression chamber; a piston disposed within and axially aligned with the air compression chamber; and a spring operatively arranged to bias the piston toward a rest position from a cocked position within the air compression chamber. Complainants incorporate the evidence identified in claims 1 and 8. See e.g., PTT PULSAR PRO (PTT00000002):

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	projectile launcher when piston is in cocked position projectile launcher when piston is in in rest position soft-projectile located at the firing position is accelerated and launched from the projectile launcher smaller diameter tube air compression chamber (when not disassembled) biasing force of the spring is sufficient to cause the piston to move from the cocked position to the rest position to force air from the air compression chamber into the smaller diameter tube and cause a soft-projectile located at the firing position to accelerate and be launched from the projectile launcher Exploded partial view This is also the sequence depicted in PTT00000031. Complainants may further rely on fact and expert witness testimony, on additional documents identified during fact and expert discovery, and on expert reports to show that the PTT Accused Products practice this element.
Claim 21. The projectile launcher of claim 8, wherein the absorbency of the super absorbent polymer is sufficiently limited to	PTT Accused Products comprise the projectile launcher of claim 8, wherein the absorbency of the super absorbent polymer is sufficiently limited to allow the soft-projectiles to be launched from the projectile launcher without breaking apart. Complainants incorporate the evidence identified in claims 1 and 8.

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allow the soft-projectiles to be launched from the projectile launcher without breaking apart.	Complainants incorporate the evidence identified in claim 1 and 8. The cross linking density is sufficient to prevent the soft-projectiles from breaking apart when launched from the projectile launcher, in that the plurality of soft-projectiles do not break apart when launched from the projectile launcher. After following hydration instructions included in each product: PTT PULSAR PRO (PTT00000002):   See HASBRO-ITC-00006670-HASBRO-ITC-00006671 (showing ammunition launched from the projectile launcher without breaking apart).

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Claim No.	Infringement Evidence
	PTT NEBULA PRO (PTT00000001):   See HASBRO-ITC-00006968-HASBRO-ITC-00006969 (showing ammunition launched from the projectile launcher without breaking apart).

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Claim No.	Infringement Evidence
	Complainants may further rely on fact and expert witness testimony, on additional documents identified during fact and expert discovery, and on expert reports to show that the PTT Accused Products practice this element.