

EX2002

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION**

MHL CUSTOM, INC.,	)	
	)	
Plaintiff,	)	
	)	Civil Action No. 22-cv-21258-MCR-ZCB
Vs.	)	
	)	
FOIL BOARDING COMPANY, INC.,	)	
d/b/a FOIL, f/k/a GET FOIL,	)	
a Florida Corporation,	)	
	)	
Defendant.	)	

DEFENDANT’S INVALIDITY CONTENTIONS

Pursuant to the Court’s Scheduling Order, Defendant, Foil Boarding Company, Inc. (“Foil”), by and through the undersigned counsel provides its Disclosure of Initial Invalidity Contentions under Local Rule 4.3(a).

Foil’s disclosure of Initial Invalidity Contentions herein is based on Foil’s current understanding of the claims of the patents-in-suit and Plaintiff’s allegations as set forth in its Initial Claim Charts. To the extent that Foil asserts existence of any element within a prior art, Foil reserves the right to allege that such element is not provided in such full, clear, concise, and exact terms as to enable any person skilled in the art to which it pertains to make and use the same. Foil reserves all rights to supplement and/or amend its response based upon Plaintiff’s claim construction position, the Court’s claim construction order, or statements made by Plaintiff in either currently pending or future litigation or administrative proceedings. Furthermore, to the extent that Plaintiff amends its asserted claims or theories of infringement, Foil reserves the right to amend its Invalidity Contentions. To the extent that Foil states that there would be a motivation

to combine pieces of prior art, Foil reserves the right to supplement and/or amend its Response upon the production of further discovery by the Plaintiff, Defendant, or third-parties, including expert discovery. Foil further reserves the right to supplement and/or amend its Response to the fullest extent permitted by the Federal Rules of Civil Procedure, the Local Rules, and the Orders of the Court.

**The Identity of Each Item of Prior Art that Allegedly Anticipates
Each Asserted Claim or Renders It Obvious**

Foil identifies the following pieces of prior art as being prior art to the '044 Patent and '659 Patent under 35 U.S.C. 102:

- Evolo Final Report (“Evoloreport”), published April 23, 2009, as § 102(a)(1) prior art;
- Evolo prototype run (“Evolovideos-PrototypeRun”), published May 5, 2009 at https://www.youtube.com/watch?v=a-_OCN50aWo, as § 102(a)(1) prior art;
- Evolo movie (“Evolovideos-Evolomovie”), published June 11, 2009 at <https://www.youtube.com/watch?v=zL9fO8tFl18>, as § 102(a)(1) prior art;
- Test run – the new Torqeedo 4.0 R installed on Evolo!!! (“Evolovideos-TestRun”), published April 29, 2009 at <https://www.youtube.com/watch?v=fKOQ0JwQnjc>, as § 102(a)(1) prior art
- U.S. Patent 6,234,856 (“Woolley”), filed September 23, 1999, issued May 22, 2001, as § 102(a)(1) and (2) prior art;
- U.S. Patent 4,020,782 (“Gleason”), filed January 26, 1976, issued May 3, 1977, as § 102(a)(1) and (2) prior art;
- U.S. Patent 8,290,636 (“Manning”), filed April 20, 2008, issued October 16, 2012, as § 102(a)(1) and (2) prior art;
- Operating Manual Cruise 2.0 (“TorqeedoManual”), published February 2007, as § 102(a)(1) prior art
- U.S. Patent Application 201100111650A1 (“Braden”), filed October 26, 2010 as § 102(a)(1) and (2) prior art;
- U.S. Patent 5,544,607 (“Rorabaugh”), filed February 13, 1995 as § 102(a)(1) and (2) prior art;

**Whether Each Item of Prior Art Anticipates Each Asserted Claim
or Renders It Obvious and the Combination of Items of Prior Art**

Foil asserts that the following prior art render all asserted claims of the '044 Patent and '659 Patent on their own in light of the knowledge of someone skilled in the art.

- Evoloreport
- Evolovideos-PrototypeRun
- Evolovideos-Evolomovie

- EvoloVideos-TestRun
- Rorabaugh

Foil asserts that the following prior art renders the listed claims of the '044 Patent and '659 Patent obvious to someone skilled in the art.

- EvoloReport and Woolley – A POSITA would have been motivated to combine EvoloReport and Woolley to provide for a passively stable hydrofoil with the apparatus disclosed by EvoloReport. (Claims 1, 2, 5-8, 10-15, 17-18, 20-21 of the '044 Patent; Claims 1, 2, 4-5, 7-11, 13, 15 of the '659 Patent)
- EvoloVideo-PrototypeRun, EvoloVideo-EvoloMovie, EvoloVideo-TestRun, and Woolley - A POSITA would have been motivated to combine the Evolo Videos and Woolley to provide for a passively stable hydrofoil with the apparatus disclosed by the Evolo Videos. A POSITA would have been motivated to combine the disclosures of the three Evolo Videos because these three videos are all related to the disclosure of the same apparatus, even if in different manners or across different time. (Claims 1, 5-8, 10, 17, 21 of the '044 Patent; Claims 1, 4-5, 7, 15 of the '659 Patent)
- EvoloVideo-PrototypeRun, EvoloVideo-EvoloMovie, EvoloVideo-TestRun, Woolley, and TorpeedoManual – A POSITA would have been motivated to combine the TorpeedoManual with the other prior art because the Evolo Videos disclose the use of a Torpeedo brand propulsion system and the TorpeedoManual discloses additional information about the Torpeedo propulsion system. (Claims 2, 12-14, 20 of the '044 Patent; Claims 2, 9-10 of the '659 Patent)
- EvoloVideo-PrototypeRun, EvoloVideo-EvoloMovie, EvoloVideo-TestRun, Woolley, TorpeedoManual, and Gleason - A POSITA would have been motivated to combine Gleason with the previous prior art to create a watercraft having a motor speed controller and battery in a waterproof container within the flotation device. (Claim 11 of the '044 Patent; Claim 8 of the '659 Patent)
- EvoloVideo-PrototypeRun, EvoloVideo-EvoloMovie, EvoloVideo-TestRun, Woolley, TorpeedoManual, Gleason, and Manning - A POSITA would have been motivated to combine Manning to provide for the use of a handheld controller device with predictable results. (Claims 15, 18 of the '044 Patent; Claims 11, 13 of the '659 Patent)
- Rorabaugh and Woolley - A POSITA would have been motivated to combine Rorabaugh and Woolley to provide for a passively stable hydrofoil with the apparatus disclosed by Rorabaugh (Claims 1, 2, 5-8, 10-15, 17-18, 20-21 of the '044 Patent; Claims 1, 2, 4-5, 7-11, 13, 15 of the '659 Patent)
- Braden and Rorabaugh - A POSITA would have been motivated to combine Braden and Woolley to provide for a passively stable hydrofoil with the apparatus disclosed by Braden (Claims 1, 2, 5-8, 10-15, 17-18, 20-21 of the '044 Patent; Claims 1, 2, 4-5, 7-11, 13, 15 of the '659 Patent)
- Woolley and Braden - A POSITA would have been motivated to combine Woolley and Braden to provide an electric propulsion system to Woolley as disclosed by Braden (Claims 1, 2, 5-8, 10-15, 17-18, 20-21 of the '044 Patent; Claims 1, 2, 4-5, 7-11, 13, 15 of the '659 Patent)

**A Chart Identifying Where Specifically In Each Alleged Item of
Prior Art Each Element of Each Asserted Claim is Found**

Foil has attached claim charts as Exhibits A - J identifies the following claim charts attached hereto.

**Any Grounds of Invalidity Based on Any Applicable Provision of
35 U.S.C. 112**

U.S. Patent No. 9,359,044

Foil asserts that the '044 Patent is invalid under 35 U.S.C. 112 for not being fully enabled (enablement) and for failing to fully point out and distinctly claim the invention (indefiniteness). Foil asserts that the '044 Patent is not fully enabled because the '044 Patent does not fully enable the claim scope of the following claim elements:

1. Passively stable (First used in claim 1)
2. Weight-shift controlled (First used in claim 1)
3. Personal hydrofoil watercraft (First used in claim 1)
4. Having a forward section, a middle section, and a rear section (First used in claim 1)
5. Flotation device being controlled via weight shift of the user (First used in claim 1)
6. Designed to provide passive static stability controlled solely by weight shift of the user (First used in claim 1)
7. Watercraft having no movable steering system (First used in claim 1)
8. Motor speed controller (First used in claim 2)
9. A combination of airfoil design, planform design and tailoring of span-wise twist distribution (First used in claim 5)
10. Indirectly connected (First used in claim 7)
11. Directly connected (First used in claim 8)
12. Waterproof (First used in claim 11)

Foil asserts that the '044 Patent fails to fully point out and distinctly claim the invention because it claims a mixed system and method claim. In addition, Foil asserts that the following claim terms are indefinite because the fail to fully point out and distinctly claim the invention:

1. Passively stable (First used in claim 1)
2. Weight-shift controlled (First used in claim 1)
3. Personal hydrofoil watercraft (First used in claim 1)
4. Wherein a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position (First used in claim 1)
5. Having a forward section, a middle section, and a rear section (First used in claim 1)
6. Flotation device being controlled via weight shift of the user (First used in claim 1)
7. The upper end fixedly interconnected with the flotation device between the middle

- section and the rear section of the flotation device (First used in claim 1)
- 8. Designed to provide passive static stability controlled solely by weight shift of the user (First used in claim 1)
- 9. Watercraft having no movable steering system (First used in claim 1)
- 10. A combination of airfoil design, planform design and tailoring of span-wise twist distribution (First used in claim 5)
- 11. Indirectly connected (First used in claim 7)
- 12. Directly connected (First used in claim 8)
- 13. Waterproof (First used in claim 11)

U.S. Patent No. 9,586,659

Foil asserts that the '659 Patent is invalid under 35 U.S.C. 112 for not being fully enabled (enablement) and for failing to fully point out and distinctly claim the invention (indefiniteness). Foil asserts that the '659 Patent is not fully enabled because the '659 Patent does not fully enable the claim scope of the following claim elements:

- 1. Passively stable (First used in claim 1)
- 2. Weight-shift controlled (First used in claim 1)
- 3. Personal hydrofoil watercraft (First used in claim 1)
- 4. Having a forward section, a middle section, and a rear section (First used in claim 1)
- 5. Watercraft having no movable steering system (First used in claim 1)
- 6. Motor speed controller (First used in claim 2)
- 7. Waterproof (First used in claim 9)
- 8. Directly or indirectly connected (First used in claim 15)

Foil asserts that the '659 Patent fails to fully point out and distinctly claim the invention because it claims a mixed system and method claim. In addition, Foil asserts that the following claim terms are indefinite because the fail to fully point out and distinctly claim the invention:

- 1. Passively stable (First used in claim 1)
- 2. Weight-shift controlled (First used in claim 1)
- 3. Personal hydrofoil watercraft (First used in claim 1)
- 4. Wherein a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position (First used in claim 1)
- 5. Having a forward section, a middle section, and a rear section (First used in claim 1)
- 6. The upper end fixedly interconnected with the flotation device between the middle section and the rear section of the flotation device (First used in claim 1)
- 7. Watercraft having no movable steering system (First used in claim 1)
- 8. Waterproof (First used in claim 9)
- 9. Directly or indirectly connected (First used in claim 15)

Dated: December 6, 2023.

ADAMSIP, LLC

By: /s/ James Hunter Adams

JAMES HUNTER ADAMS

Alabama Bar No. 5289J80Z
453 Dauphin Street, Floor 2

Mobile, AL 36602

(251) 289-9787 (Office)

hunter@adamsiplaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been provided electronically to all parties via electronic mail on of December 6, 2023, including the following:

Stephen D. Wilson (sdw@beggslane.com), *Attorney for MHL Custom, Inc.*

John R. Zoesch, III (jrz@beggslane.com). *Attorney for MHL Custom, Inc.*

Brian McGraw (bmcgraw@grayice.com). *Attorney for MHL Custom, Inc.*

Robert Theuerkauf (rjt@grayice.com). *Attorney for MHL Custom, Inc.*

EXHIBIT A

EvoloReport

U.S. Patent No. 9,359,044

Claim No.	Claim Element	EvoloReport
1	A passively stable, weight-shift controlled personal hydrofoil watercraft, comprising:	EvoloReport <i>generally</i> ; EvoloReport at 546.
	a flotation device that has a fore-aft length greater than a lateral width, the flotation device having a top surface and a bottom surface, where in a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position,	EvoloReport at 546-551.
	the flotation device having a forward section, a middle section, and a rear section, and the flotation device being controlled via weight shift of the user;	EvoloReport at 546-551.

	a strut having an upper end and a lower end, the upper end fixedly interconnected with the flotation device between the middle section and the rear section of the flotation device;	EvoloReport at 211-215, 546, 549-550.
	a hydrofoil fixedly interconnected with the lower end of the strut, the hydrofoil having no moveable surface and designed to provide passive static stability controlled solely by weight shift of the user;	EvoloReport at 29, 58-62, 88-98, 546, 549
	a propulsion system for propelling the watercraft in a body of water, wherein the propulsion system is connected to the hydrofoil; and	EvoloReport at 549, 551-552.
	the watercraft having no moveable steering system.	EvoloReport, <i>generally</i> , 551.

2.	A watercraft in accordance with claim 1, wherein the propulsion system comprises a battery, an electric motor, a motor speed controller, and a propulsor, the propulsor selected from a propeller, a ducted propeller, or a pump-jet.	EvolReport at 9, 498.
5.	A watercraft in accordance with claim 1, where the design for providing the passive static stability is achieved through a combination of airfoil design, planform design and tailoring of span-wise twist distribution.	
6.	A watercraft in accordance with claim 1, wherein the hydrofoil is wing shaped with a front edge and a rear edge that both curve rearwardly.	

7.	A watercraft in accordance with claim 1, wherein the hydrofoil is indirectly connected to the strut.	EvoloReport at 256-267, 271, 295, 322, 370-373.
8.	A watercraft in accordance with claim 7, wherein the strut is directly connected to the propulsion system.	EvoloReport at 14, 276-277, 371.
10.	A watercraft in accordance with claim 7, wherein the hydrofoil comprises a plurality of wings that are interconnected by way of a strut.	EvoloReport at 7.
11.	A watercraft in accordance with claim 2, wherein the battery and motor speed controller are contained in a water-proof compartment integrated into the flotation device.	EvoloReport at 8, 180-181, 184-186, 189, 193, 327, 490, 498, 524, 550.
12.	A watercraft in accordance with claim 2, wherein the electric	EvoloReport at 257, 276, 492, 515.

	motor is integrated into a waterproof, streamlined pod and the watercraft comprises a cooling system.	
13.	A watercraft in accordance with claim 2, wherein the electric motor is removably interconnected with the hydrofoil through a fitting.	EvoloReport at 256-257, 271.
14.	A watercraft in accordance with claim 10, wherein the first hydrofoil wing includes winglets extending at an angle to a main body of the first hydrofoil wing.	
15.	A watercraft in accordance with claim 11, further comprising a wireless handheld controller having a transmitter, and a throttle interface having a receiver, wherein the transmitter is adapted to	EvoloReport at 524.

	send wireless signal to the receiver that cause an output of the propulsion system to change.	
17.	A watercraft in accordance with claim 1, wherein the hydrofoil is spaced a fixed distance apart from the flotation device.	EvoloReport at 275.
18.	A watercraft in accordance with claim 15, wherein the strut has an internal passage and electrical wires extend from the electric motor to the waterproof compartment inside the strut through the internal passage for controlling the electric motor.	EvoloReport at 14, 275-276.
20.	A watercraft in accordance with claim 11, wherein the electric motor is a brushless motor.	EvoloReport at 498.

21.	A watercraft in accordance with claim 1, wherein the propulsion system is directly or indirectly connected to the hydrofoil.	EvoloReport at 271, 370.
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U.S. Patent No. 9,586,659

Claim No.	Claim Element	Response
1	A passively stable, weight-shift controlled personal hydrofoil watercraft, comprising:	Evoloreport <i>generally</i> ; Evoloreport at 546.
	a flotation device that has a fore-aft length of greater than a lateral width, the flotation device having a top surface and a bottom surface, wherein a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position,	Evoloreport at 546-551.
	the flotation device having a forward section, a middle section, and a rear section;	Evoloreport at 546-551.
	a strut having a upper end and a lower end, the upper end fixedly	Evoloreport at 211-215, 546, 549-550.

	interconnected with the flotation device between the middle section and the rear section of the flotation device;	
	a hydrofoil fixedly interconnected with the lower end of the strut, the hydrofoil having no movable surface;	EvoloReport at 29, 58-62, 88-98, 546, 549
	a propulsion system for propelling the watercraft in a body of water, wherein the propulsion system is connected to the hydrofoil; and	EvoloReport at 549, 551-552.
	the watercraft having no movable steering system.	EvoloReport, <i>generally</i> , 551.
2.	A watercraft in accordance with claim 1, wherein the propulsion system comprises a battery, an electric motor, a motor speed controller, and a propulsor, the propulsor	EvoloReport at 9, 498.

	selected from a propeller, a ducted propeller, or a pump-jet.	
4.	A watercraft in accordance with claim 1, wherein the hydrofoil is indirectly connected to the strut.	EvoloReport at 256-267, 271, 295, 322, 370-373.
5.	A watercraft in accordance with claim 4, wherein the strut is directly connected to the propulsion system	EvoloReport at 14, 276-277, 371.
7.	A watercraft in accordance with claim 4, wherein the hydrofoil comprises a plurality of wings that are interconnected by way of a strut.	EvoloReport at 7.
8.	A watercraft in accordance with claim 2, wherein the battery and motor speed controller are contained in a watertight compartment integrated into the flotation device.	EvoloReport at 8, 180-181, 184-186, 189, 193, 327, 490, 498, 524, 550.

9.	A watercraft in accordance with claim 2, wherein the electric motor is integrated into a waterproof, streamlined pod and the watercraft comprises a cooling system for cooling the electric motor.	Evoloreport at 257, 276, 492, 515.
10.	A watercraft in accordance with claim 9, wherein the waterproof, streamlined pod is removably interconnected with the hydrofoil through a fitting.	Evoloreport at 256-257, 271.
11.	A watercraft in accordance with claim 8, further comprising a wireless handheld controller having a transmitter, and a throttle interface having a receiver, wherein the transmitter is adapted to send wireless signals to	Evoloreport at 524.

	the receiver that cause an output of the propulsion system to change.	
13.	A watercraft in accordance with claim 8, wherein the strut has an internal passage and electrical wires extend from the electric motor to the watertight compartment inside the strut through the internal passage for controlling the electric motor.	EvoloReport at 14, 275-276.
15.	A watercraft in accordance with claim 1, wherein the propulsion system is directly or indirectly connected to the hydrofoil.	EvoloReport at 271, 370.

EXHIBIT B

EvoloVideos-PrototypeRun

U.S. Patent No. 9,359,044

Claim No.	Claim Element	EvoloVideos-PrototypeRun
1	A passively stable, weight-shift controlled personal hydrofoil watercraft, comprising:	EvoloVideos-PrototypeRun <i>generally</i> ; EvoloVideos-PrototypeRun at 1:21.
	a flotation device that has a fore-aft length greater than a lateral width, the flotation device having a top surface and a bottom surface, where in a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position,	EvoloVideos-PrototypeRun <i>generally</i> ; EvoloVideos-PrototypeRun at 0:09; 0:27 – 0:30; 1:21.
	the flotation device having a forward section, a middle section, and a rear section, and the flotation device being	EvoloVideos-PrototypeRun <i>generally</i> ; EvoloVideos-PrototypeRun at 0:09

	controlled via weight shift of the user;	
	a strut having an upper end and a lower end, the upper end fixedly interconnected with the flotation device between the middle section and the rear section of the flotation device;	Evolovideos-PrototypeRun <i>generally</i> ; Evolovideos-PrototypeRun at 0:09
	a hydrofoil fixedly interconnected with the lower end of the strut, the hydrofoil having no moveable surface and designed to provide passive static stability controlled solely by weight shift of the user;	Evolovideos-PrototypeRun <i>generally</i> ; Evolovideos-PrototypeRun at 0:09; 0:50 – 1:00; 1:53
	a propulsion system for propelling the watercraft in a body of water, wherein the propulsion system is connected to the hydrofoil; and	Evolovideos-PrototypeRun <i>generally</i> ; Evolovideos-PrototypeRun at 0:09

	the watercraft having no moveable steering system.	Evolovideos-PrototypeRun <i>generally</i> ; Evolovideos-PrototypeRun at 0:09
2.	A watercraft in accordance with claim 1, wherein the propulsion system comprises a battery, an electric motor, a motor speed controller, and a propulsor, the propulsor selected from a propeller, a ducted propeller, or a pump-jet.	Evolovideos-PrototypeRun <i>generally</i> ; Evolovideos-PrototypeRun at 0:09
5.	A watercraft in accordance with claim 1, where the design for providing the passive static stability is achieved through a combination of airfoil design, planform design and tailoring of span-wise twist distribution.	
6.	A watercraft in accordance with claim 1, wherein the hydrofoil is wing shaped with a	

	front edge and a rear edge that both curve rearwardly.	
7.	A watercraft in accordance with claim 1, wherein the hydrofoil is indirectly connected to the strut.	Evolovideos-PrototypeRun <i>generally</i> ; Evolovideos-PrototypeRun at 0:09
8.	A watercraft in accordance with claim 7, wherein the strut is directly connected to the propulsion system.	Evolovideos-PrototypeRun <i>generally</i> ; Evolovideos-PrototypeRun at 0:09
10.	A watercraft in accordance with claim 7, wherein the hydrofoil comprises a plurality of wings that are interconnected by way of a strut.	Evolovideos-PrototypeRun <i>generally</i> ; Evolovideos-PrototypeRun at 0:09
11.	A watercraft in accordance with claim 2, wherein the battery and motor speed controller are contained in a water-proof compartment integrated into the flotation device.	

12.	A watercraft in accordance with claim 2, wherein the electric motor is integrated into a waterproof, streamlined pod and the watercraft comprises a cooling system.	
13.	A watercraft in accordance with claim 2, wherein the electric motor is removably interconnected with the hydrofoil through a fitting.	
14.	A watercraft in accordance with claim 10, wherein the first hydrofoil wing includes winglets extending at an angle to a main body of the first hydrofoil wing.	
15.	A watercraft in accordance with claim 11, further comprising a wireless handheld controller having a transmitter, and a	

	throttle interface having a receiver, wherein the transmitter is adapted to send wireless signal to the receiver that cause an output of the propulsion system to change.	
17.	A watercraft in accordance with claim 1, wherein the hydrofoil is spaced a fixed distance apart from the flotation device.	Evolovideos-PrototypeRun <i>generally</i> ; EvoloVideos-PrototypeRun at 0:09
18.	A watercraft in accordance with claim 15, wherein the strut has an internal passage and electrical wires extend from the electric motor to the waterproof compartment inside the strut through the internal passage for controlling the electric motor.	
20.	A watercraft in accordance with claim	

	11, wherein the electric motor is a brushless motor.	
21.	A watercraft in accordance with claim 1, wherein the propulsion system is directly or indirectly connected to the hydrofoil.	Evolovideos-PrototypeRun <i>generally</i> ; Evolovideos-PrototypeRun at 0:09

U.S. Patent No. 9,586,659

Claim No.	Claim Element	Evolovideos-PrototypeRun
1	A passively stable, weight-shift controlled personal hydrofoil watercraft, comprising:	Evolovideos-PrototypeRun <i>generally</i> ; Evolovideos-PrototypeRun at 1:21.
	a flotation device that has a fore-aft length of greater than a lateral width, the flotation device having a top surface and a bottom surface, wherein a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position,	Evolovideos-PrototypeRun <i>generally</i> ; Evolovideos-PrototypeRun at 0:09; 0:27 – 0:30; 1:21.
	the flotation device having a forward section, a middle section, and a rear section;	Evolovideos-PrototypeRun <i>generally</i> ; Evolovideos-PrototypeRun at 0:09
	a strut having an upper end and a lower end, the	Evolovideos-PrototypeRun <i>generally</i> ; Evolovideos-PrototypeRun at 0:09

	upper end fixedly interconnected with the flotation device between the middle section and the rear section of the flotation device;	
	a hydrofoil fixedly interconnected with the lower end of the strut, the hydrofoil having no movable surface;	Evolovideos-PrototypeRun <i>generally</i> ; Evolovideos-PrototypeRun at 0:09; 0:50 – 1:00; 1:53
	a propulsion system for propelling the watercraft in a body of water, wherein the propulsion system is connected to the hydrofoil; and	Evolovideos-PrototypeRun <i>generally</i> ; Evolovideos-PrototypeRun at 0:09
	the watercraft having no movable steering system.	Evolovideos-PrototypeRun <i>generally</i> ; Evolovideos-PrototypeRun at 0:09
2.	A watercraft in accordance with claim 1, wherein the propulsion system comprises a battery, an electric motor, a motor speed controller, and a	Evolovideos-PrototypeRun <i>generally</i> ; Evolovideos-PrototypeRun at 0:09

	propulsor, the propulsor selected from a propeller, a ducted propeller, or a pump-jet.	
4.	A watercraft in accordance with claim 1, wherein the hydrofoil is indirectly connected to the strut.	Evolovideos-PrototypeRun <i>generally</i> ; Evolovideos-PrototypeRun at 0:09
5.	A watercraft in accordance with claim 4, wherein the strut is directly connected to the propulsion system	Evolovideos-PrototypeRun <i>generally</i> ; Evolovideos-PrototypeRun at 0:09
7.	A watercraft in accordance with claim 4, wherein the hydrofoil comprises a plurality of wings that are interconnected by way of a strut.	Evolovideos-PrototypeRun <i>generally</i> ; Evolovideos-PrototypeRun at 0:09
8.	A watercraft in accordance with claim 2, wherein the battery and motor speed controller are contained in a watertight	

	compartment integrated into the flotation device.	
9.	A watercraft in accordance with claim 2, wherein the electric motor is integrated into a waterproof, streamlined pod and the watercraft comprises a cooling system for cooling the electric motor.	
10.	A watercraft in accordance with claim 9, wherein the waterproof, streamlined pod is removably interconnected with the hydrofoil through a fitting.	
11.	A watercraft in accordance with claim 8, further comprising a wireless handheld controller having a transmitter, and a throttle interface having a receiver, wherein the	

	transmitter is adapted to send wireless signals to the receiver that cause an output of the propulsion system to change.	
13.	A watercraft in accordance with claim 8, wherein the strut has an internal passage and electrical wires extend from the electric motor to the watertight compartment inside the strut through the internal passage for controlling the electric motor.	
15.	A watercraft in accordance with claim 1, wherein the propulsion system is directly or indirectly connected to the hydrofoil.	Evolovideos-PrototypeRun <i>generally</i> ; Evolovideos-PrototypeRun at 0:09

EXHIBIT C

EvoloVideos-EvoloMovie

U.S. Patent No. 9,359,044

Claim No.	Claim Element	EvoloVideos-EvoloMovie
1	A passively stable, weight-shift controlled personal hydrofoil watercraft, comprising:	EvoloVideos-EvoloMovie <i>generally</i> ; EvoloVideos-EvoloMovie at 1:17-1:42.
	a flotation device that has a fore-aft length greater than a lateral width, the flotation device having a top surface and a bottom surface, where in a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position,	EvoloVideos-EvoloMovie <i>generally</i> ; EvoloVideos-EvoloMovie at 1:17-1:42.
	the flotation device having a forward section, a middle section, and a rear section, and the flotation device being	EvoloVideos-EvoloMovie <i>generally</i> ; EvoloVideos-EvoloMovie at 1:17-1:42.

	controlled via weight shift of the user;	
	a strut having an upper end and a lower end, the upper end fixedly interconnected with the flotation device between the middle section and the rear section of the flotation device;	EvoloVideos-EvoloMovie <i>generally</i> ; EvoloVideos-EvoloMovie at 1:42.
	a hydrofoil fixedly interconnected with the lower end of the strut, the hydrofoil having no moveable surface and designed to provide passive static stability controlled solely by weight shift of the user;	EvoloVideos-EvoloMovie <i>generally</i> ; EvoloVideos-EvoloMovie at 1:42.
	a propulsion system for propelling the watercraft in a body of water, wherein the propulsion system is connected to the hydrofoil; and	EvoloVideos-EvoloMovie <i>generally</i> ; EvoloVideos-EvoloMovie at 1:42.

	the watercraft having no moveable steering system.	Evolovideos-Evolomovie <i>generally</i> ; Evolovideos-Evolomovie at 1:17-1:42.
2.	A watercraft in accordance with claim 1, wherein the propulsion system comprises a battery, an electric motor, a motor speed controller, and a propulsor, the propulsor selected from a propeller, a ducted propeller, or a pump-jet.	Evolovideos-Evolomovie <i>generally</i> ; Evolovideos-Evolomovie at 1:42.
5.	A watercraft in accordance with claim 1, where the design for providing the passive static stability is achieved through a combination of airfoil design, planform design and tailoring of span-wise twist distribution.	
6.	A watercraft in accordance with claim 1, wherein the hydrofoil is wing shaped with a	

	front edge and a rear edge that both curve rearwardly.	
7.	A watercraft in accordance with claim 1, wherein the hydrofoil is indirectly connected to the strut.	Evolovideos-Evolomovie <i>generally</i> ; Evolovideos-Evolomovie at 1:42.
8.	A watercraft in accordance with claim 7, wherein the strut is directly connected to the propulsion system.	Evolovideos-Evolomovie <i>generally</i> ; Evolovideos-Evolomovie at 1:42.
10.	A watercraft in accordance with claim 7, wherein the hydrofoil comprises a plurality of wings that are interconnected by way of a strut.	Evolovideos-Evolomovie <i>generally</i> ; Evolovideos-Evolomovie at 1:42.
11.	A watercraft in accordance with claim 2, wherein the battery and motor speed controller are contained in a water-proof compartment integrated into the flotation device.	

12.	A watercraft in accordance with claim 2, wherein the electric motor is integrated into a waterproof, streamlined pod and the watercraft comprises a cooling system.	
13.	A watercraft in accordance with claim 2, wherein the electric motor is removably interconnected with the hydrofoil through a fitting.	
14.	A watercraft in accordance with claim 10, wherein the first hydrofoil wing includes winglets extending at an angle to a main body of the first hydrofoil wing.	
15.	A watercraft in accordance with claim 11, further comprising a wireless handheld controller having a transmitter, and a	

	throttle interface having a receiver, wherein the transmitter is adapted to send wireless signal to the receiver that cause an output of the propulsion system to change.	
17.	A watercraft in accordance with claim 1, wherein the hydrofoil is spaced a fixed distance apart from the flotation device.	Evolovideos-Evolomovie <i>generally</i> ; Evolovideos-Evolomovie at 1:42.
18.	A watercraft in accordance with claim 15, wherein the strut has an internal passage and electrical wires extend from the electric motor to the waterproof compartment inside the strut through the internal passage for controlling the electric motor.	
20.	A watercraft in accordance with claim	

	11, wherein the electric motor is a brushless motor.	
21.	A watercraft in accordance with claim 1, wherein the propulsion system is directly or indirectly connected to the hydrofoil.	EvoloVideos-EvoloMovie <i>generally</i> ; EvoloVideos-EvoloMovie at 1:42.

U.S. Patent No. 9,586,659

Claim No.	Claim Element	Evolovideos-Evolomovie
1	A passively stable, weight-shift controlled personal hydrofoil watercraft, comprising:	Evolovideos-Evolomovie <i>generally</i> ; Evolovideos-PrototypeRun at 1:17-1:42.
	a flotation device that has a fore-aft length of greater than a lateral width, the flotation device having a top surface and a bottom surface, wherein a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position,	Evolovideos-Evolomovie <i>generally</i> ; Evolovideos-PrototypeRun at 1:17-1:42.
	the flotation device having a forward section, a middle section, and a rear section;	Evolovideos-Evolomovie <i>generally</i> ; Evolovideos-Evolomovie at 1:17-1:42.
	a strut having an upper end and a lower end, the	Evolovideos-Evolomovie <i>generally</i> ; Evolovideos-Evolomovie at 1:17-1:42.

	upper end fixedly interconnected with the flotation device between the middle section and the rear section of the flotation device;	
	a hydrofoil fixedly interconnected with the lower end of the strut, the hydrofoil having no movable surface;	Evolovideos-Evolomovie <i>generally</i> ; Evolovideos-Evolomovie at 1:42.
	a propulsion system for propelling the watercraft in a body of water, wherein the propulsion system is connected to the hydrofoil; and	Evolovideos-Evolomovie <i>generally</i> ; Evolovideos-Evolomovie at 1:42.
	the watercraft having no movable steering system.	Evolovideos-Evolomovie <i>generally</i> ; Evolovideos-Evolomovie at 1:17-1:42.
2.	A watercraft in accordance with claim 1, wherein the propulsion system comprises a battery, an electric motor, a motor speed controller, and a	Evolovideos-Evolomovie <i>generally</i> ; Evolovideos-Evolomovie at 1:42.

	propulsor, the propulsor selected from a propeller, a ducted propeller, or a pump-jet.	
4.	A watercraft in accordance with claim 1, wherein the hydrofoil is indirectly connected to the strut.	Evolovideos-Evolomovie <i>generally</i> ; Evolovideos-Evolomovie at 1:42.
5.	A watercraft in accordance with claim 4, wherein the strut is directly connected to the propulsion system	Evolovideos-Evolomovie <i>generally</i> ; Evolovideos-Evolomovie at 1:42.
7.	A watercraft in accordance with claim 4, wherein the hydrofoil comprises a plurality of wings that are interconnected by way of a strut.	Evolovideos-Evolomovie <i>generally</i> ; Evolovideos-Evolomovie at 1:42.
8.	A watercraft in accordance with claim 2, wherein the battery and motor speed controller are contained in a watertight	

	compartment integrated into the flotation device.	
9.	A watercraft in accordance with claim 2, wherein the electric motor is integrated into a waterproof, streamlined pod and the watercraft comprises a cooling system for cooling the electric motor.	
10.	A watercraft in accordance with claim 9, wherein the waterproof, streamlined pod is removably interconnected with the hydrofoil through a fitting.	
11.	A watercraft in accordance with claim 8, further comprising a wireless handheld controller having a transmitter, and a throttle interface having a receiver, wherein the	

	transmitter is adapted to send wireless signals to the receiver that cause an output of the propulsion system to change.	
13.	A watercraft in accordance with claim 8, wherein the strut has an internal passage and electrical wires extend from the electric motor to the watertight compartment inside the strut through the internal passage for controlling the electric motor.	
15.	A watercraft in accordance with claim 1, wherein the propulsion system is directly or indirectly connected to the hydrofoil.	EvoloVideos-EvoloMovie <i>generally</i> ; EvoloVideos-EvoloMovie at 1:42.

EXHIBIT D

EvoloVideos-TestRun

U.S. Patent No. 9,359,044

Claim No.	Claim Element	EvoloVideos-TestRun
1	A passively stable, weight-shift controlled personal hydrofoil watercraft, comprising:	
	a flotation device that has a fore-aft length greater than a lateral width, the flotation device having a top surface and a bottom surface, where in a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position,	
	the flotation device having a forward section, a middle section, and a rear section, and the flotation device being	

	controlled via weight shift of the user;	
	a strut having an upper end and a lower end, the upper end fixedly interconnected with the flotation device between the middle section and the rear section of the flotation device;	
	a hydrofoil fixedly interconnected with the lower end of the strut, the hydrofoil having no moveable surface and designed to provide passive static stability controlled solely by weight shift of the user;	
	a propulsion system for propelling the watercraft in a body of water, wherein the propulsion system is connected to the hydrofoil; and	EvoloVideos-EvoloTestRun at 0:23

	the watercraft having no moveable steering system.	
2.	A watercraft in accordance with claim 1, wherein the propulsion system comprises a battery, an electric motor, a motor speed controller, and a propulsor, the propulsor selected from a propeller, a ducted propeller, or a pump-jet.	EvoloVideos-EvoloTestRun at 0:23
5.	A watercraft in accordance with claim 1, where the design for providing the passive static stability is achieved through a combination of airfoil design, planform design and tailoring of span-wise twist distribution.	
6.	A watercraft in accordance with claim 1, wherein the hydrofoil is wing shaped with a	

	front edge and a rear edge that both curve rearwardly.	
7.	A watercraft in accordance with claim 1, wherein the hydrofoil is indirectly connected to the strut.	EvoloVideos-EvoloTestRun 0:23-0:28
8.	A watercraft in accordance with claim 7, wherein the strut is directly connected to the propulsion system.	EvoloVideos-EvoloTestRun 0:01; 0:23-0:28
10.	A watercraft in accordance with claim 7, wherein the hydrofoil comprises a plurality of wings that are interconnected by way of a strut.	
11.	A watercraft in accordance with claim 2, wherein the battery and motor speed controller are contained in a water-proof compartment integrated into the flotation device.	

12.	A watercraft in accordance with claim 2, wherein the electric motor is integrated into a waterproof, streamlined pod and the watercraft comprises a cooling system.	EvoloVideos-EvoloTestRun at 0:23
13.	A watercraft in accordance with claim 2, wherein the electric motor is removably interconnected with the hydrofoil through a fitting.	EvoloVideos-EvoloTestRun at 0:23
14.	A watercraft in accordance with claim 10, wherein the first hydrofoil wing includes winglets extending at an angle to a main body of the first hydrofoil wing.	
15.	A watercraft in accordance with claim 11, further comprising a wireless handheld controller having a transmitter, and a	

	throttle interface having a receiver, wherein the transmitter is adapted to send wireless signal to the receiver that cause an output of the propulsion system to change.	
17.	A watercraft in accordance with claim 1, wherein the hydrofoil is spaced a fixed distance apart from the flotation device.	
18.	A watercraft in accordance with claim 15, wherein the strut has an internal passage and electrical wires extend from the electric motor to the waterproof compartment inside the strut through the internal passage for controlling the electric motor.	
20.	A watercraft in accordance with claim	

	11, wherein the electric motor is a brushless motor.	
21.	A watercraft in accordance with claim 1, wherein the propulsion system is directly or indirectly connected to the hydrofoil.	

U.S. Patent No. 9,586,659

Claim No.	Claim Element	Evolovideos-TestRun
1	A passively stable, weight-shift controlled personal hydrofoil watercraft, comprising:	
	a flotation device that has a fore-aft length of greater than a lateral width, the flotation device having a top surface and a bottom surface, wherein a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position,	
	the flotation device having a forward section, a middle section, and a rear section;	
	a strut having an upper end and a lower end, the	

	upper end fixedly interconnected with the flotation device between the middle section and the rear section of the flotation device;	
	a hydrofoil fixedly interconnected with the lower end of the strut, the hydrofoil having no movable surface;	
	a propulsion system for propelling the watercraft in a body of water, wherein the propulsion system is connected to the hydrofoil; and	EvoloVideos-EvoloTestRun at 0:23
	the watercraft having no movable steering system.	
2.	A watercraft in accordance with claim 1, wherein the propulsion system comprises a battery, an electric motor, a motor speed controller, and a	EvoloVideos-EvoloTestRun at 0:23

	propulsor, the propulsor selected from a propeller, a ducted propeller, or a pump-jet.	
4.	A watercraft in accordance with claim 1, wherein the hydrofoil is indirectly connected to the strut.	EvoloVideos-EvoloTestRun 0:23-0:28
5.	A watercraft in accordance with claim 4, wherein the strut is directly connected to the propulsion system	EvoloVideos-EvoloTestRun 0:01; 0:23-0:28
7.	A watercraft in accordance with claim 4, wherein the hydrofoil comprises a plurality of wings that are interconnected by way of a strut.	
8.	A watercraft in accordance with claim 2, wherein the battery and motor speed controller are contained in a watertight	

	compartment integrated into the flotation device.	
9.	A watercraft in accordance with claim 2, wherein the electric motor is integrated into a waterproof, streamlined pod and the watercraft comprises a cooling system for cooling the electric motor.	
10.	A watercraft in accordance with claim 9, wherein the waterproof, streamlined pod is removably interconnected with the hydrofoil through a fitting.	
11.	A watercraft in accordance with claim 8, further comprising a wireless handheld controller having a transmitter, and a throttle interface having a receiver, wherein the	

	transmitter is adapted to send wireless signals to the receiver that cause an output of the propulsion system to change.	
13.	A watercraft in accordance with claim 8, wherein the strut has an internal passage and electrical wires extend from the electric motor to the watertight compartment inside the strut through the internal passage for controlling the electric motor.	
15.	A watercraft in accordance with claim 1, wherein the propulsion system is directly or indirectly connected to the hydrofoil.	EvoloVideos-EvoloTestRun at 0:23-0:27

EXHIBIT E

Woolley

U.S. Patent No. 9,359,044

Claim No.	Claim Element	Woolley
1	A passively stable, weight-shift controlled personal hydrofoil watercraft, comprising:	Woolley at Figs. 1, 6A, 6B, 7A, 7B, 10A, 11A; 4:16-25; 6:16-18; 10:22-27; 10:30-33; 11:6-15; 11:22-30; 16:39-19:60
	a flotation device that has a fore-aft length greater than a lateral width, the flotation device having a top surface and a bottom surface, where in a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position,	Woolley at Fig. 1
	the flotation device having a forward section, a middle section, and a rear section, and the flotation device being	Woolley at Fig. 1

	controlled via weight shift of the user;	
	a strut having an upper end and a lower end, the upper end fixedly interconnected with the flotation device between the middle section and the rear section of the flotation device;	Woolley at Fig. 1
	a hydrofoil fixedly interconnected with the lower end of the strut, the hydrofoil having no moveable surface and designed to provide passive static stability controlled solely by weight shift of the user;	Woolley at Figs. 1, 6A, 6B, 7A, 7B, 10A, 11A; 4:16-25; 6:16-18; 10:22-27; 10:30-33; 11:6-15; 11:22-30; 16:39-19:60
	a propulsion system for propelling the watercraft in a body of water, wherein the propulsion system is connected to the hydrofoil; and	

	the watercraft having no moveable steering system.	<u>Woolley at Fig. 1</u>
2.	A watercraft in accordance with claim 1, wherein the propulsion system comprises a battery, an electric motor, a motor speed controller, and a propulsor, the propulsor selected from a propeller, a ducted propeller, or a pump-jet.	
5.	A watercraft in accordance with claim 1, where the design for providing the passive static stability is achieved through a combination of airfoil design, planform design and tailoring of span-wise twist distribution.	Woolley at Figs. 1, 6A, 6B, 7A, 7B, 10A, 11A; 4:16-25; 6:16-18; 10:22-27; 10:30-33; 11:6-15; 11:22-30; 16:39-19:60
6.	A watercraft in accordance with claim 1, wherein the hydrofoil is wing shaped with a	Woolley at Fig. 7B; 4:63-64; 13:54-57;

	front edge and a rear edge that both curve rearwardly.	
7.	A watercraft in accordance with claim 1, wherein the hydrofoil is indirectly connected to the strut.	
8.	A watercraft in accordance with claim 7, wherein the strut is directly connected to the propulsion system.	
10.	A watercraft in accordance with claim 7, wherein the hydrofoil comprises a plurality of wings that are interconnected by way of a strut.	
11.	A watercraft in accordance with claim 2, wherein the battery and motor speed controller are contained in a water-proof compartment integrated into the flotation device.	

12.	A watercraft in accordance with claim 2, wherein the electric motor is integrated into a waterproof, streamlined pod and the watercraft comprises a cooling system.	
13.	A watercraft in accordance with claim 2, wherein the electric motor is removably interconnected with the hydrofoil through a fitting.	
14.	A watercraft in accordance with claim 10, wherein the first hydrofoil wing includes winglets extending at an angle to a main body of the first hydrofoil wing.	Woolley at 4:65-67; 5:3-4; 11:17-19; Figs 8A, 9A
15.	A watercraft in accordance with claim 11, further comprising a wireless handheld controller having a transmitter, and a	

	throttle interface having a receiver, wherein the transmitter is adapted to send wireless signal to the receiver that cause an output of the propulsion system to change.	
17.	A watercraft in accordance with claim 1, wherein the hydrofoil is spaced a fixed distance apart from the flotation device.	Woolley at Fig. 1
18.	A watercraft in accordance with claim 15, wherein the strut has an internal passage and electrical wires extend from the electric motor to the waterproof compartment inside the strut through the internal passage for controlling the electric motor.	
20.	A watercraft in accordance with claim	

	11, wherein the electric motor is a brushless motor.	
21.	A watercraft in accordance with claim 1, wherein the propulsion system is directly or indirectly connected to the hydrofoil.	

U.S. Patent No. 9,586,659

Claim No.	Claim Element	Woolley
1	A passively stable, weight-shift controlled personal hydrofoil watercraft, comprising:	Woolley at Figs. 1, 6A, 6B, 7A, 7B, 10A, 11A; 4:16-25; 6:16-18; 10:22-27; 10:30-33; 11:6-15; 11:22-30; 16:39-19:60
	a flotation device that has a fore-aft length of greater than a lateral width, the flotation device having a top surface and a bottom surface, wherein a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position,	Woolley at Fig. 1
	the flotation device having a forward section, a middle section, and a rear section;	Woolley at Fig. 1
	a strut having an upper end and a lower end, the	Woolley at Fig. 1

	upper end fixedly interconnected with the flotation device between the middle section and the rear section of the flotation device;	
	a hydrofoil fixedly interconnected with the lower end of the strut, the hydrofoil having no movable surface;	Woolley at Figs. 1, 6A, 6B, 7A, 7B, 10A, 11A; 4:16-25; 6:16-18; 10:22-27; 10:30-33; 11:6-15; 11:22-30; 16:39-19:60
	a propulsion system for propelling the watercraft in a body of water, wherein the propulsion system is connected to the hydrofoil; and	
	the watercraft having no movable steering system.	Woolley at Fig. 1
2.	A watercraft in accordance with claim 1, wherein the propulsion system comprises a battery, an electric motor, a motor speed controller, and a	

	propulsor, the propulsor selected from a propeller, a ducted propeller, or a pump-jet.	
4.	A watercraft in accordance with claim 1, wherein the hydrofoil is indirectly connected to the strut.	
5.	A watercraft in accordance with claim 4, wherein the strut is directly connected to the propulsion system	
7.	A watercraft in accordance with claim 4, wherein the hydrofoil comprises a plurality of wings that are interconnected by way of a strut.	Woolley at Figs 1, 8A
8.	A watercraft in accordance with claim 2, wherein the battery and motor speed controller are contained in a watertight	

	compartment integrated into the flotation device.	
9.	A watercraft in accordance with claim 2, wherein the electric motor is integrated into a waterproof, streamlined pod and the watercraft comprises a cooling system for cooling the electric motor.	
10.	A watercraft in accordance with claim 9, wherein the waterproof, streamlined pod is removably interconnected with the hydrofoil through a fitting.	
11.	A watercraft in accordance with claim 8, further comprising a wireless handheld controller having a transmitter, and a throttle interface having a receiver, wherein the	

	transmitter is adapted to send wireless signals to the receiver that cause an output of the propulsion system to change.	
13.	A watercraft in accordance with claim 8, wherein the strut has an internal passage and electrical wires extend from the electric motor to the watertight compartment inside the strut through the internal passage for controlling the electric motor.	
15.	A watercraft in accordance with claim 1, wherein the propulsion system is directly or indirectly connected to the hydrofoil.	

EXHIBIT F

Gleason

U.S. Patent No. 9,359,044

Claim No.	Claim Element	Gleason
1	A passively stable, weight-shift controlled personal hydrofoil watercraft, comprising:	
	a flotation device that has a fore-aft length greater than a lateral width, the flotation device having a top surface and a bottom surface, where in a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position,	
	the flotation device having a forward section, a middle section, and a rear section, and the flotation device being controlled via weight shift of the user;	

	a strut having an upper end and a lower end, the upper end fixedly interconnected with the flotation device between the middle section and the rear section of the flotation device;	
	a hydrofoil fixedly interconnected with the lower end of the strut, the hydrofoil having no moveable surface and designed to provide passive static stability controlled solely by weight shift of the user;	
	a propulsion system for propelling the watercraft in a body of water, wherein the propulsion system is connected to the hydrofoil; and	Gleason at Fig 1, 2:16-21; 2:39-46
	the watercraft having no moveable steering system.	

2.	A watercraft in accordance with claim 1, wherein the propulsion system comprises a battery, an electric motor, a motor speed controller, and a propulsor, the propulsor selected from a propeller, a ducted propeller, or a pump-jet.	Gleason at Fig 1, 2:16-21; 2:39-46
5.	A watercraft in accordance with claim 1, where the design for providing the passive static stability is achieved through a combination of airfoil design, planform design and tailoring of span-wise twist distribution.	
6.	A watercraft in accordance with claim 1, wherein the hydrofoil is wing shaped with a front edge and a rear edge that both curve rearwardly.	

7.	A watercraft in accordance with claim 1, wherein the hydrofoil is indirectly connected to the strut.	
8.	A watercraft in accordance with claim 7, wherein the strut is directly connected to the propulsion system.	
10.	A watercraft in accordance with claim 7, wherein the hydrofoil comprises a plurality of wings that are interconnected by way of a strut.	
11.	A watercraft in accordance with claim 2, wherein the battery and motor speed controller are contained in a water-proof compartment integrated into the flotation device.	Gleason at Fig 1, 2:16-21; 2:39-46
12.	A watercraft in accordance with claim 2, wherein the electric	

	motor is integrated into a waterproof, streamlined pod and the watercraft comprises a cooling system.	
13.	A watercraft in accordance with claim 2, wherein the electric motor is removably interconnected with the hydrofoil through a fitting.	
14.	A watercraft in accordance with claim 10, wherein the first hydrofoil wing includes winglets extending at an angle to a main body of the first hydrofoil wing.	
15.	A watercraft in accordance with claim 11, further comprising a wireless handheld controller having a transmitter, and a throttle interface having a receiver, wherein the transmitter is adapted to	

	send wireless signal to the receiver that cause an output of the propulsion system to change.	
17.	A watercraft in accordance with claim 1, wherein the hydrofoil is spaced a fixed distance apart from the flotation device.	
18.	A watercraft in accordance with claim 15, wherein the strut has an internal passage and electrical wires extend from the electric motor to the waterproof compartment inside the strut through the internal passage for controlling the electric motor.	
20.	A watercraft in accordance with claim 11, wherein the electric motor is a brushless motor.	

21.	A watercraft in accordance with claim 1, wherein the propulsion system is directly or indirectly connected to the hydrofoil.	
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U.S. Patent No. 9,586,659

Claim No.	Claim Element	Gleason
1	A passively stable, weight-shift controlled personal hydrofoil watercraft, comprising:	
	a flotation device that has a fore-aft length of greater than a lateral width, the flotation device having a top surface and a bottom surface, wherein a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position,	
	the flotation device having a forward section, a middle section, and a rear section;	
	a strut having a upper end and a lower end, the upper end fixedly	

	interconnected with the flotation device between the middle section and the rear section of the flotation device;	
	a hydrofoil fixedly interconnected with the lower end of the strut, the hydrofoil having no movable surface;	
	a propulsion system for propelling the watercraft in a body of water, wherein the propulsion system is connected to the hydrofoil; and	Gleason at Fig 1, 2:16-21; 2:39-46
	the watercraft having no movable steering system.	
2.	A watercraft in accordance with claim 1, wherein the propulsion system comprises a battery, an electric motor, a motor speed controller, and a propulsor, the propulsor	Gleason at Fig 1, 2:16-21; 2:39-46

	selected from a propeller, a ducted propeller, or a pump-jet.	
4.	A watercraft in accordance with claim 1, wherein the hydrofoil is indirectly connected to the strut.	
5.	A watercraft in accordance with claim 4, wherein the strut is directly connected to the propulsion system	
7.	A watercraft in accordance with claim 4, wherein the hydrofoil comprises a plurality of wings that are interconnected by way of a strut.	
8.	A watercraft in accordance with claim 2, wherein the battery and motor speed controller are contained in a watertight compartment integrated into the flotation device.	Gleason at Fig 1, 2:16-21; 2:39-46

9.	A watercraft in accordance with claim 2, wherein the electric motor is integrated into a waterproof, streamlined pod and the watercraft comprises a cooling system for cooling the electric motor.	Gleason at Fig 1, 2:16-21; 2:39-46
10.	A watercraft in accordance with claim 9, wherein the waterproof, streamlined pod is removably interconnected with the hydrofoil through a fitting.	
11.	A watercraft in accordance with claim 8, further comprising a wireless handheld controller having a transmitter, and a throttle interface having a receiver, wherein the transmitter is adapted to send wireless signals to	

	the receiver that cause an output of the propulsion system to change.	
13.	A watercraft in accordance with claim 8, wherein the strut has an internal passage and electrical wires extend from the electric motor to the watertight compartment inside the strut through the internal passage for controlling the electric motor.	
15.	A watercraft in accordance with claim 1, wherein the propulsion system is directly or indirectly connected to the hydrofoil.	

EXHIBIT G

Manning

U.S. Patent No. 9,359,044

Claim No.	Claim Element	Manning
1	A passively stable, weight-shift controlled personal hydrofoil watercraft, comprising:	
	a flotation device that has a fore-aft length greater than a lateral width, the flotation device having a top surface and a bottom surface, where in a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position,	
	the flotation device having a forward section, a middle section, and a rear section, and the flotation device being	

	controlled via weight shift of the user;	
	a strut having an upper end and a lower end, the upper end fixedly interconnected with the flotation device between the middle section and the rear section of the flotation device;	
	a hydrofoil fixedly interconnected with the lower end of the strut, the hydrofoil having no moveable surface and designed to provide passive static stability controlled solely by weight shift of the user;	
	a propulsion system for propelling the watercraft in a body of water, wherein the propulsion system is connected to the hydrofoil; and	

	the watercraft having no moveable steering system.	
2.	A watercraft in accordance with claim 1, wherein the propulsion system comprises a battery, an electric motor, a motor speed controller, and a propulsor, the propulsor selected from a propeller, a ducted propeller, or a pump-jet.	
5.	A watercraft in accordance with claim 1, where the design for providing the passive static stability is achieved through a combination of airfoil design, planform design and tailoring of span-wise twist distribution.	
6.	A watercraft in accordance with claim 1, wherein the hydrofoil is wing shaped with a	

	front edge and a rear edge that both curve rearwardly.	
7.	A watercraft in accordance with claim 1, wherein the hydrofoil is indirectly connected to the strut.	
8.	A watercraft in accordance with claim 7, wherein the strut is directly connected to the propulsion system.	
10.	A watercraft in accordance with claim 7, wherein the hydrofoil comprises a plurality of wings that are interconnected by way of a strut.	
11.	A watercraft in accordance with claim 2, wherein the battery and motor speed controller are contained in a water-proof compartment integrated into the flotation device.	

12.	A watercraft in accordance with claim 2, wherein the electric motor is integrated into a waterproof, streamlined pod and the watercraft comprises a cooling system.	
13.	A watercraft in accordance with claim 2, wherein the electric motor is removably interconnected with the hydrofoil through a fitting.	
14.	A watercraft in accordance with claim 10, wherein the first hydrofoil wing includes winglets extending at an angle to a main body of the first hydrofoil wing.	
15.	A watercraft in accordance with claim 11, further comprising a wireless handheld controller having a transmitter, and a	Manning at Fig. 7; 2:27-41; 9:24-28

	throttle interface having a receiver, wherein the transmitter is adapted to send wireless signal to the receiver that cause an output of the propulsion system to change.	
17.	A watercraft in accordance with claim 1, wherein the hydrofoil is spaced a fixed distance apart from the flotation device.	
18.	A watercraft in accordance with claim 15, wherein the strut has an internal passage and electrical wires extend from the electric motor to the waterproof compartment inside the strut through the internal passage for controlling the electric motor.	
20.	A watercraft in accordance with claim	

	11, wherein the electric motor is a brushless motor.	
21.	A watercraft in accordance with claim 1, wherein the propulsion system is directly or indirectly connected to the hydrofoil.	

U.S. Patent No. 9,586,659

Claim No.	Claim Element	Manning
1	A passively stable, weight-shift controlled personal hydrofoil watercraft, comprising:	
	a flotation device that has a fore-aft length of greater than a lateral width, the flotation device having a top surface and a bottom surface, wherein a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position,	
	the flotation device having a forward section, a middle section, and a rear section;	
	a strut having an upper end and a lower end, the	

	upper end fixedly interconnected with the flotation device between the middle section and the rear section of the flotation device;	
	a hydrofoil fixedly interconnected with the lower end of the strut, the hydrofoil having no movable surface;	
	a propulsion system for propelling the watercraft in a body of water, wherein the propulsion system is connected to the hydrofoil; and	
	the watercraft having no movable steering system.	
2.	A watercraft in accordance with claim 1, wherein the propulsion system comprises a battery, an electric motor, a motor speed controller, and a	

	propulsor, the propulsor selected from a propeller, a ducted propeller, or a pump-jet.	
4.	A watercraft in accordance with claim 1, wherein the hydrofoil is indirectly connected to the strut.	
5.	A watercraft in accordance with claim 4, wherein the strut is directly connected to the propulsion system	
7.	A watercraft in accordance with claim 4, wherein the hydrofoil comprises a plurality of wings that are interconnected by way of a strut.	
8.	A watercraft in accordance with claim 2, wherein the battery and motor speed controller are contained in a watertight	

	compartment integrated into the flotation device.	
9.	A watercraft in accordance with claim 2, wherein the electric motor is integrated into a waterproof, streamlined pod and the watercraft comprises a cooling system for cooling the electric motor.	
10.	A watercraft in accordance with claim 9, wherein the waterproof, streamlined pod is removably interconnected with the hydrofoil through a fitting.	
11.	A watercraft in accordance with claim 8, further comprising a wireless handheld controller having a transmitter, and a throttle interface having a receiver, wherein the	Manning at Fig. 7; 2:27-41; 9:24-28

	transmitter is adapted to send wireless signals to the receiver that cause an output of the propulsion system to change.	
13.	A watercraft in accordance with claim 8, wherein the strut has an internal passage and electrical wires extend from the electric motor to the watertight compartment inside the strut through the internal passage for controlling the electric motor.	
15.	A watercraft in accordance with claim 1, wherein the propulsion system is directly or indirectly connected to the hydrofoil.	

EXHIBIT H

TorqueedoManual

U.S. Patent No. 9,359,044

Claim No.	Claim Element	TorqueedoManual
1	A passively stable, weight-shift controlled personal hydrofoil watercraft, comprising:	
	a flotation device that has a fore-aft length greater than a lateral width, the flotation device having a top surface and a bottom surface, where in a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position,	
	the flotation device having a forward section, a middle section, and a rear section, and the flotation device being	

	controlled via weight shift of the user;	
	a strut having an upper end and a lower end, the upper end fixedly interconnected with the flotation device between the middle section and the rear section of the flotation device;	
	a hydrofoil fixedly interconnected with the lower end of the strut, the hydrofoil having no moveable surface and designed to provide passive static stability controlled solely by weight shift of the user;	
	a propulsion system for propelling the watercraft in a body of water, wherein the propulsion system is connected to the hydrofoil; and	

	the watercraft having no moveable steering system.	
2.	A watercraft in accordance with claim 1, wherein the propulsion system comprises a battery, an electric motor, a motor speed controller, and a propulsor, the propulsor selected from a propeller, a ducted propeller, or a pump-jet.	TorqueedoManual at 7, 13, 23
5.	A watercraft in accordance with claim 1, where the design for providing the passive static stability is achieved through a combination of airfoil design, planform design and tailoring of span-wise twist distribution.	
6.	A watercraft in accordance with claim 1, wherein the hydrofoil is wing shaped with a	

	front edge and a rear edge that both curve rearwardly.	
7.	A watercraft in accordance with claim 1, wherein the hydrofoil is indirectly connected to the strut.	
8.	A watercraft in accordance with claim 7, wherein the strut is directly connected to the propulsion system.	
10.	A watercraft in accordance with claim 7, wherein the hydrofoil comprises a plurality of wings that are interconnected by way of a strut.	
11.	A watercraft in accordance with claim 2, wherein the battery and motor speed controller are contained in a water-proof compartment integrated into the flotation device.	TorqueedoManual at 7, 11, 13, 23

12.	A watercraft in accordance with claim 2, wherein the electric motor is integrated into a waterproof, streamlined pod and the watercraft comprises a cooling system.	TorqueedoManual at 7, 11, 13, 23
13.	A watercraft in accordance with claim 2, wherein the electric motor is removably interconnected with the hydrofoil through a fitting.	
14.	A watercraft in accordance with claim 10, wherein the first hydrofoil wing includes winglets extending at an angle to a main body of the first hydrofoil wing.	
15.	A watercraft in accordance with claim 11, further comprising a wireless handheld controller having a transmitter, and a	

	throttle interface having a receiver, wherein the transmitter is adapted to send wireless signal to the receiver that cause an output of the propulsion system to change.	
17.	A watercraft in accordance with claim 1, wherein the hydrofoil is spaced a fixed distance apart from the flotation device.	
18.	A watercraft in accordance with claim 15, wherein the strut has an internal passage and electrical wires extend from the electric motor to the waterproof compartment inside the strut through the internal passage for controlling the electric motor.	
20.	A watercraft in accordance with claim	

	11, wherein the electric motor is a brushless motor.	
21.	A watercraft in accordance with claim 1, wherein the propulsion system is directly or indirectly connected to the hydrofoil.	

U.S. Patent No. 9,586,659

Claim No.	Claim Element	TorqueedoManual
1	A passively stable, weight-shift controlled personal hydrofoil watercraft, comprising:	
	a flotation device that has a fore-aft length of greater than a lateral width, the flotation device having a top surface and a bottom surface, wherein a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position,	
	the flotation device having a forward section, a middle section, and a rear section;	
	a strut having an upper end and a lower end, the	

	upper end fixedly interconnected with the flotation device between the middle section and the rear section of the flotation device;	
	a hydrofoil fixedly interconnected with the lower end of the strut, the hydrofoil having no movable surface;	
	a propulsion system for propelling the watercraft in a body of water, wherein the propulsion system is connected to the hydrofoil; and	
	the watercraft having no movable steering system.	
2.	A watercraft in accordance with claim 1, wherein the propulsion system comprises a battery, an electric motor, a motor speed controller, and a	TorqueDo Manual at 7, 11, 13, 23

	propulsor, the propulsor selected from a propeller, a ducted propeller, or a pump-jet.	
4.	A watercraft in accordance with claim 1, wherein the hydrofoil is indirectly connected to the strut.	
5.	A watercraft in accordance with claim 4, wherein the strut is directly connected to the propulsion system	
7.	A watercraft in accordance with claim 4, wherein the hydrofoil comprises a plurality of wings that are interconnected by way of a strut.	
8.	A watercraft in accordance with claim 2, wherein the battery and motor speed controller are contained in a watertight	TorqueedoManual at 7, 11, 13, 23

	compartment integrated into the flotation device.	
9.	A watercraft in accordance with claim 2, wherein the electric motor is integrated into a waterproof, streamlined pod and the watercraft comprises a cooling system for cooling the electric motor.	TorqueedoManual at 7, 11, 13, 23
10.	A watercraft in accordance with claim 9, wherein the waterproof, streamlined pod is removably interconnected with the hydrofoil through a fitting.	
11.	A watercraft in accordance with claim 8, further comprising a wireless handheld controller having a transmitter, and a throttle interface having a receiver, wherein the	

	transmitter is adapted to send wireless signals to the receiver that cause an output of the propulsion system to change.	
13.	A watercraft in accordance with claim 8, wherein the strut has an internal passage and electrical wires extend from the electric motor to the watertight compartment inside the strut through the internal passage for controlling the electric motor.	
15.	A watercraft in accordance with claim 1, wherein the propulsion system is directly or indirectly connected to the hydrofoil.	

EXHIBIT I

Braden

U.S. Patent No. 9,359,044

Claim No.	Claim Element	Braden
1	A passively stable, weight-shift controlled personal hydrofoil watercraft, comprising:	Braden at Fig. 1, 2
	a flotation device that has a fore-aft length greater than a lateral width, the flotation device having a top surface and a bottom surface, where in a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position,	Braden at Fig. 1, 2
	the flotation device having a forward section, a middle section, and a rear section, and the flotation device being	Braden at Fig. 1, 2

	controlled via weight shift of the user;	
	a strut having an upper end and a lower end, the upper end fixedly interconnected with the flotation device between the middle section and the rear section of the flotation device;	Braden at Fig. 1, ¶24
	a hydrofoil fixedly interconnected with the lower end of the strut, the hydrofoil having no moveable surface and designed to provide passive static stability controlled solely by weight shift of the user;	
	a propulsion system for propelling the watercraft in a body of water, wherein the propulsion system is connected to the hydrofoil; and	Braden at Fig. 1, ¶24

	the watercraft having no moveable steering system.	
2.	A watercraft in accordance with claim 1, wherein the propulsion system comprises a battery, an electric motor, a motor speed controller, and a propulsor, the propulsor selected from a propeller, a ducted propeller, or a pump-jet.	Braden at Fig. 1, ¶24, 26
5.	A watercraft in accordance with claim 1, where the design for providing the passive static stability is achieved through a combination of airfoil design, planform design and tailoring of span-wise twist distribution.	
6.	A watercraft in accordance with claim 1, wherein the hydrofoil is wing shaped with a	

	front edge and a rear edge that both curve rearwardly.	
7.	A watercraft in accordance with claim 1, wherein the hydrofoil is indirectly connected to the strut.	
8.	A watercraft in accordance with claim 7, wherein the strut is directly connected to the propulsion system.	Braden at Fig. 1, ¶24, 26
10.	A watercraft in accordance with claim 7, wherein the hydrofoil comprises a plurality of wings that are interconnected by way of a strut.	
11.	A watercraft in accordance with claim 2, wherein the battery and motor speed controller are contained in a water-proof compartment integrated into the flotation device.	Braden at Fig 1, ¶24, 26

12.	A watercraft in accordance with claim 2, wherein the electric motor is integrated into a waterproof, streamlined pod and the watercraft comprises a cooling system.	Braden at Fig. 1.
13.	A watercraft in accordance with claim 2, wherein the electric motor is removably interconnected with the hydrofoil through a fitting.	
14.	A watercraft in accordance with claim 10, wherein the first hydrofoil wing includes winglets extending at an angle to a main body of the first hydrofoil wing.	
15.	A watercraft in accordance with claim 11, further comprising a wireless handheld controller having a transmitter, and a	Braden at ¶27

	throttle interface having a receiver, wherein the transmitter is adapted to send wireless signal to the receiver that cause an output of the propulsion system to change.	
17.	A watercraft in accordance with claim 1, wherein the hydrofoil is spaced a fixed distance apart from the flotation device.	
18.	A watercraft in accordance with claim 15, wherein the strut has an internal passage and electrical wires extend from the electric motor to the waterproof compartment inside the strut through the internal passage for controlling the electric motor.	Braden at Fig. 1
20.	A watercraft in accordance with claim	

	11, wherein the electric motor is a brushless motor.	
21.	A watercraft in accordance with claim 1, wherein the propulsion system is directly or indirectly connected to the hydrofoil.	

U.S. Patent No. 9,586,659

Claim No.	Claim Element	Braden
1	A passively stable, weight-shift controlled personal hydrofoil watercraft, comprising:	Braden at Fig 1, ¶24, 26
	a flotation device that has a fore-aft length of greater than a lateral width, the flotation device having a top surface and a bottom surface, wherein a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position,	Braden at Fig 1, ¶24, 26
	the flotation device having a forward section, a middle section, and a rear section;	Braden at Fig 1, ¶24, 26
	a strut having a upper end and a lower end, the	Braden at Fig 1, ¶24, 26

	upper end fixedly interconnected with the flotation device between the middle section and the rear section of the flotation device;	
	a hydrofoil fixedly interconnected with the lower end of the strut, the hydrofoil having no movable surface;	
	a propulsion system for propelling the watercraft in a body of water, wherein the propulsion system is connected to the hydrofoil; and	Braden at Fig 1, ¶24, 26
	the watercraft having no movable steering system.	Braden at Fig 1, ¶24, 26
2.	A watercraft in accordance with claim 1, wherein the propulsion system comprises a battery, an electric motor, a motor speed controller, and a	Braden at Fig 1, ¶24, 26

	propulsor, the propulsor selected from a propeller, a ducted propeller, or a pump-jet.	
4.	A watercraft in accordance with claim 1, wherein the hydrofoil is indirectly connected to the strut.	
5.	A watercraft in accordance with claim 4, wherein the strut is directly connected to the propulsion system	Braden at Fig 1, ¶24, 26
7.	A watercraft in accordance with claim 4, wherein the hydrofoil comprises a plurality of wings that are interconnected by way of a strut.	
8.	A watercraft in accordance with claim 2, wherein the battery and motor speed controller are contained in a watertight	Braden at Fig 1, ¶24, 26

	compartment integrated into the flotation device.	
9.	A watercraft in accordance with claim 2, wherein the electric motor is integrated into a waterproof, streamlined pod and the watercraft comprises a cooling system for cooling the electric motor.	Braden at Fig 1, ¶24, 26
10.	A watercraft in accordance with claim 9, wherein the waterproof, streamlined pod is removably interconnected with the hydrofoil through a fitting.	Braden at Fig 1, ¶24, 26
11.	A watercraft in accordance with claim 8, further comprising a wireless handheld controller having a transmitter, and a throttle interface having a receiver, wherein the	Braden at ¶27

	transmitter is adapted to send wireless signals to the receiver that cause an output of the propulsion system to change.	
13.	A watercraft in accordance with claim 8, wherein the strut has an internal passage and electrical wires extend from the electric motor to the watertight compartment inside the strut through the internal passage for controlling the electric motor.	Braden at Fig 1, ¶24, 26
15.	A watercraft in accordance with claim 1, wherein the propulsion system is directly or indirectly connected to the hydrofoil.	

EXHIBIT J

Rorabaugh

U.S. Patent No. 9,359,044

Claim No.	Claim Element	Rorabaugh
1	A passively stable, weight-shift controlled personal hydrofoil watercraft, comprising:	Rorabaugh at Fig. 1, 10:37-44
	a flotation device that has a fore-aft length greater than a lateral width, the flotation device having a top surface and a bottom surface, where in a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position,	Rorabaugh at Fig. 1
	the flotation device having a forward section, a middle section, and a rear section, and the flotation device being	Rorabaugh at Fig. 1

	controlled via weight shift of the user;	
	a strut having an upper end and a lower end, the upper end fixedly interconnected with the flotation device between the middle section and the rear section of the flotation device;	Rorabaugh at Fig. 1
	a hydrofoil fixedly interconnected with the lower end of the strut, the hydrofoil having no moveable surface and designed to provide passive static stability controlled solely by weight shift of the user;	Rorabaugh at Fig. 1
	a propulsion system for propelling the watercraft in a body of water, wherein the propulsion system is connected to the hydrofoil; and	Rorabaugh at Fig. 1, 8:10-13

	the watercraft having no moveable steering system.	Rorabaugh at Fig. 1
2.	A watercraft in accordance with claim 1, wherein the propulsion system comprises a battery, an electric motor, a motor speed controller, and a propulsor, the propulsor selected from a propeller, a ducted propeller, or a pump-jet.	Rorabaugh at Fig. 1
5.	A watercraft in accordance with claim 1, where the design for providing the passive static stability is achieved through a combination of airfoil design, planform design and tailoring of span-wise twist distribution.	
6.	A watercraft in accordance with claim 1, wherein the hydrofoil is wing shaped with a	

	front edge and a rear edge that both curve rearwardly.	
7.	A watercraft in accordance with claim 1, wherein the hydrofoil is indirectly connected to the strut.	Rorabaugh at Fig. 1
8.	A watercraft in accordance with claim 7, wherein the strut is directly connected to the propulsion system.	Rorabaugh at Fig. 1
10.	A watercraft in accordance with claim 7, wherein the hydrofoil comprises a plurality of wings that are interconnected by way of a strut.	
11.	A watercraft in accordance with claim 2, wherein the battery and motor speed controller are contained in a water-proof compartment integrated into the flotation device.	Rorabaugh at Fig. 1

12.	A watercraft in accordance with claim 2, wherein the electric motor is integrated into a waterproof, streamlined pod and the watercraft comprises a cooling system.	Rorabaugh at Fig. 1
13.	A watercraft in accordance with claim 2, wherein the electric motor is removably interconnected with the hydrofoil through a fitting.	
14.	A watercraft in accordance with claim 10, wherein the first hydrofoil wing includes winglets extending at an angle to a main body of the first hydrofoil wing.	
15.	A watercraft in accordance with claim 11, further comprising a wireless handheld controller having a transmitter, and a	

	throttle interface having a receiver, wherein the transmitter is adapted to send wireless signal to the receiver that cause an output of the propulsion system to change.	
17.	A watercraft in accordance with claim 1, wherein the hydrofoil is spaced a fixed distance apart from the flotation device.	
18.	A watercraft in accordance with claim 15, wherein the strut has an internal passage and electrical wires extend from the electric motor to the waterproof compartment inside the strut through the internal passage for controlling the electric motor.	
20.	A watercraft in accordance with claim	

	11, wherein the electric motor is a brushless motor.	
21.	A watercraft in accordance with claim 1, wherein the propulsion system is directly or indirectly connected to the hydrofoil.	Rorabaugh at Fig. 1

U.S. Patent No. 9,586,659

Claim No.	Claim Element	Rorabaugh
1	A passively stable, weight-shift controlled personal hydrofoil watercraft, comprising:	Rorabaugh at Fig. 1, 10:37-44
	a flotation device that has a fore-aft length of greater than a lateral width, the flotation device having a top surface and a bottom surface, wherein a user can be disposed on the top surface of the flotation device in a prone, kneeling, or standing position,	Rorabaugh at Fig. 1
	the flotation device having a forward section, a middle section, and a rear section;	Rorabaugh at Fig. 1
	a strut having a upper end and a lower end, the	Rorabaugh at Fig. 1

	upper end fixedly interconnected with the flotation device between the middle section and the rear section of the flotation device;	
	a hydrofoil fixedly interconnected with the lower end of the strut, the hydrofoil having no movable surface;	Rorabaugh at Fig. 1
	a propulsion system for propelling the watercraft in a body of water, wherein the propulsion system is connected to the hydrofoil; and	Rorabaugh at Fig. 1, 8:10-13
	the watercraft having no movable steering system.	Rorabaugh at Fig. 1
2.	A watercraft in accordance with claim 1, wherein the propulsion system comprises a battery, an electric motor, a motor speed controller, and a	Rorabaugh at Fig. 1

	propulsor, the propulsor selected from a propeller, a ducted propeller, or a pump-jet.	
4.	A watercraft in accordance with claim 1, wherein the hydrofoil is indirectly connected to the strut.	Rorabaugh at Fig. 1
5.	A watercraft in accordance with claim 4, wherein the strut is directly connected to the propulsion system	Rorabaugh at Fig. 1
7.	A watercraft in accordance with claim 4, wherein the hydrofoil comprises a plurality of wings that are interconnected by way of a strut.	
8.	A watercraft in accordance with claim 2, wherein the battery and motor speed controller are contained in a watertight	Rorabaugh at Fig. 1

	compartment integrated into the flotation device.	
9.	A watercraft in accordance with claim 2, wherein the electric motor is integrated into a waterproof, streamlined pod and the watercraft comprises a cooling system for cooling the electric motor.	Rorabaugh at Fig. 1
10.	A watercraft in accordance with claim 9, wherein the waterproof, streamlined pod is removably interconnected with the hydrofoil through a fitting.	
11.	A watercraft in accordance with claim 8, further comprising a wireless handheld controller having a transmitter, and a throttle interface having a receiver, wherein the	

	transmitter is adapted to send wireless signals to the receiver that cause an output of the propulsion system to change.	
13.	A watercraft in accordance with claim 8, wherein the strut has an internal passage and electrical wires extend from the electric motor to the watertight compartment inside the strut through the internal passage for controlling the electric motor.	Rorabaugh at Fig. 1
15.	A watercraft in accordance with claim 1, wherein the propulsion system is directly or indirectly connected to the hydrofoil.	Rorabaugh at Fig. 1