

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HENGST SE,

Plaintiff,

v.

CHAMPION LABORATORIES, INC.,

Defendant.

Case No. 23-cv-00794

Judge Sara L. Ellis

Magistrate Judge Heather K. McShain

**PLAINTIFF’S LOCAL PATENT RULE 3.2 RESPONSE
TO FINAL INVALIDITY CONTENTIONS**

Pursuant to Local Patent Rule (“LPR”) 3.2, Plaintiff Hengst SE (“Hengst” or “Plaintiff”), by and through its undersigned counsel, submits the following response to the Final Invalidity Contentions of Defendant Champion Laboratories, Inc. (“Champion” or “Defendant”), dated January 16, 2024.

Hengst reserves the right to modify, amend, and/or supplement its Response to Invalidity Contentions (the “Response”) to the extent permitted by the Federal Rules of Civil Procedure and the Local Patent Rules of this Court. Discovery in this case is ongoing. Hengst specifically reserves the right to modify, amend, and/or supplement any of its responses due not only to discovery obtained from Defendant, but also discovery obtained from third parties, any of Defendant’s contentions, the issuance of a claim construction ruling by the Court, or any other reason permitted under the Federal Rules of Civil Procedure and/or the Local Patent Rules of this Court.

The Court has not yet construed the Asserted Claims. Hengst reserves the right to supplement, modify, or amend the Responses after the Court issues its claim construction ruling.

Hengst has not tried to infer, and takes no position regarding, any claim construction matter allegedly described in Defendant's Contentions. Any statement describing or tending to describe any claim element provided in this Response is provided solely for the purpose of understanding the contention or the relevant prior art reference and is not to be interpreted as an attempt to construe any claim limitation, or as an admission as to the proper construction of any claim limitation.

I. CHAMPION HAS NOT COMPLIED WITH THE LOCAL PATENT RULES

Local Patent Rule 2.3(b)(2) requires that Defendant's invalidity contentions contain "for each item of prior art, a detailed statement of whether it allegedly anticipates or renders obvious each asserted claim. If a combination of items of prior art allegedly makes a claim obvious, the Invalidity Contentions must identify each such combination and the reasons to combine such items." Moreover, Local Patent Rule 2.3(b)(3) states Defendant's contentions must include "a chart identifying *where specifically* in each alleged item of prior art each element of each asserted claim is found." In Exhibits C-2 through C-4, Champion asserts that *Audi System* renders claims of the '203 Patent obvious in combination with various additional references. However, in asserting that *Audi System* renders claims of the '203 Patent obvious, Champion refers to and identifies elements in DE 10 2007 062 102 ("Grass") and U.S. 6,706,181 ("Baumann") as disclosing claim recitations of the '203 Patent. *See, e.g.*, Champion's Final Invalidity Contentions, Ex. C-2 at p. 11. As such, Champion has failed to identify where specifically in the *Audi System* said claim elements are disclosed or rendered obvious, and has thus failed to comply with the Local Patent Rules. Hengst is thus unable to understand many of Champion's assertions with respect to Champions invalidity claims involving *Audi System* in Exhibits C-2 through C-4.

Local Patent Rule 3.1 states that “for each claim alleged to be invalid, the Final Unenforceability and Invalidity Contentions are limited to four (4) prior art grounds per claim and four (4) non-prior art grounds.” While Exhibits C-1 through C-4 assert four prior art grounds of invalidity per claim, Exhibit B of Champion’s Final Invalidity Contentions includes references not relied upon in Exhibits C-1 through C-4. In accordance with Exhibits C-1 through C-4, Hengst understands that Champion’s invalidity contentions are as follows: (1) anticipation and/or obviousness over U.S. 2012/0261326 (“Deschamps”); (2) obviousness over JP 2004-136203 (“Yokoyama”) in view of Audi System; (3) obviousness over WO 2008134494 (“Honermann”) in view of Audi System; and (4) obviousness over U.S. 2006/0219621 (“Dworatzek”) in view of Audi System. *See* Champion’s Final Invalidity Contentions, Ex. C-1–C-4. The additional references included in Exhibit B of Champion’s Final Invalidity Contentions are thus deemed superfluous and are understood to form no part of Champion’s four permitted prior art ground invalidity claims permitted under Local Patent Rule 3.1. Additionally, Champion has identified five non-prior art grounds for invalidity in violation of Local Patent Rule 3.1. *See* Champion’s Final Invalidity Contentions, p. 4-5.

II. HENGST’S LPR 3.2(b) RESPONSE TO CHAMPION’S FINAL UNENFORCEABILITY AND INVALIDITY CONTENTIONS

A. Response to Champion’s Prior Art Contentions Under LPR 2.3(b)(1)-(3)

Hengst contends that the asserted patent is valid, and that none of the prior art cited by Defendant invalidates any of the asserted claims either by anticipation or obviousness. Hengst disputes any contention that motivation to combine any of the cited prior art exists within the references themselves, or within the knowledge of those of ordinary skill in the art. Pursuant to LPR 3.2(b), Hengst has prepared charts responsive to the invalidity charts in Exhibit C-1 through C-4 served by Defendant under LPR 2.3(b)(3) (Exhibits 1-4). Hengst reserves all rights to modify

or provide additional reasons and explanations for such denials.

In Exhibit C-1, Champion asserts that claims of the ‘203 Patent are invalid for anticipation and/or obviousness over *Deschamps*. However, *Deschamps* is not prior art with respect to the ‘203 Patent under pre-AIA 35 U.S.C. § 102. Accordingly, no claims of the ‘203 Patent can be found invalid over *Deschamps*.

In Exhibits C-2 through C-4, Champion asserts that *Audi System* renders claims of the ‘203 Patent obvious in combination with various additional references. The materials provided by Champion are insufficient to establish that *Audi System* is prior art over the ‘203 Patent. See CL008471-CL008565. While Champion generally asserts that *Audi System* “was in public use, on sale, sold, known in this country, or otherwise available to the public since at least 2006,” Champion has not provided a specific date at which a specific product was in public use, on sale, sold, known in this country, or otherwise available to the public. Champion’s Final Invalidity Contentions, Ex. C-2, p. 1. Moreover, the materials cited as describing the *Audi System* cast doubt as to whether the *Audi System* is prior art as to the ‘203 Patent. For example, the identified part number for *Audi System* is 079198405E, yet the document relied on by Champion indicates that there were various supersessions of this product. CL008480-CL008483. Thus, it is likely that several design changes occurred to this product, and it is unclear as to when said design changes occurred and what elements of the device were changed in said design changes. It is Champion’s burden to show that *Audi System* was in public use, on sale, sold, known in this country, or otherwise available to the public by clear and convincing evidence. *Trading Techs. Int’l, Inc. v. eSpeed, Inc.*, 507 F. Supp. 2d 883, 887–88 (N.D. Ill. 2007); see also *Sandt Tech., Ltd. v. Resco Metal & Plastics Corp.*, 264 F.3d 1344, 1350 (Fed. Cir. 2001). As such, Champion has failed to meet its burden to show that *Audi System* predates the priority date of the ‘203 Patent, and the *Audi*

System materials relied upon by Champion show that it is unlikely that *Audi System*, as defined in Exhibits C-2 through C-4, qualifies as prior art as to the '203 Patent.

Moreover, in its assertions related to *Audi System*, Champion relies on two patents, *Grass* and *Baumann*, as describing the functionality of *Audi System*. Champion's Final Invalidity Contentions, Ex. C-2, p. 2. However, it is unclear as to whether or how the structure and function shown in these patents is present in *Audi System*, and Champion has not provided evidence to support this conclusion. For example, the structure of the apparent top and bottom front panels, as well as the structure of the apparent blocking element appears significantly different than in the *Audi System*. CL008480-CL008483.; *Grass*, Fig. 1; *Baumann* Fig. 9. Additionally, although Champion contends that *Audi System* "was in public use, on sale, sold, known in this country, or otherwise available to the public since at least 2006," this statement is inconsistent with the filing date of *Grass*. Champion's Final Invalidity Contentions, Ex. C-2, p. 1. It is Champion's burden to show that *Audi System* discloses the elements of the '203 Patent by clear and convincing evidence that is corroborated. *Sandt Tech., Ltd. v. Resco Metal & Plastics Corp.*, 264 F.3d 1344, 1350 (Fed. Cir. 2001). Champion has failed to meet this burden to show that alleged connection between these patents and the *Audi System*, and Hengst disputes that either patent describes the functionality of *Audi System*. Nevertheless, despite Champion's failure to show that *Audi System* qualifies as prior art and despite Champion's reliance on seemingly irrelevant materials, Hengst has provided Exhibits 2-4, which are responsive charts to Champion's Exhibits C-2 through C-4 including *Audi System*. In its Exhibits C-2 through C-4, Hengst has attempted to understand and address the *Audi System* with the limited materials and description provided by Champion related to the Audi Engine Oil Filter Element Part Number 079198405E and Audi Engine Oil Filter Housing Part Number 079115401AA. CL008471-CL008483.

In addition to the reasons provided in Exhibits 1-4, Hengst asserts that the combination of references in Champion's § 103 invalidity assertions are improper due to the following: (1) the combination of references were made with impermissible hindsight reasoning; (2) one skilled in the art would not have a reasonable expectation of success with the asserted combination of references; (3) there is no motivation to combine the asserted prior art references; (4) the asserted prior art references teach away from the asserted combination of references; and (5) the asserted combination would leave references unsatisfactory for their intended purpose.

For example, Champion contends that it would be obvious to combine both *Yokoyama* in view of *Audi System* and *Honermann* in view of *Audi System* because the eccentric blocking element and eccentric opening of *Audi System* would "[allow] clogged or contaminated oil to be discharged when the filter insert is removed from the housing." See Champion Invalidity Contentions Ex. C-2, p. 12. However, both *Yokoyama* and *Honermann* already contain a mechanism for allowing fluid to be drained when the filter insert is removed from the housing. See *Yokoyama*, plug/cap on bottom 31 shown in FIG. 2-3; *Honermann*, drainage aperture arrangement 160 shown in FIG. 10. In light of this, no person of skill in the art would be motivated to combine these references as alleged. Moreover, both *Yokoyama* and *Honermann* contain filters that are assembled such that the filters screw upward into a mounting plate and/or upper housing part. See *Yokoyama*, FIG. 2; *Honermann*, FIG. 1. In contrast, the filter apparatus 10 of *Audi System* appears to be mounted onto an engine block such that a cover is coupled to a base housing part. See *Audi System*, Champion's Final Invalidity Contentions, Ex. C-2. It is unclear as to how Champion asserts references with such distinct structural differences could be combined to arrive at the claims of the '203 Patent. Thus, no person of skill in the art would make the asserted combinations.

Likewise, no person of skill in the art would have been motivated to combine *Dworatzek* in view of *Audi System*. For example, *Dworatzek* discloses what is primarily an air filter: “the filter housing 10 is closed by a housing lid. The medium to be filtered, e.g., air, flows through the unfiltered air inlet 13 into the outer unfiltered air chamber 14 of the filter housing.” *See Dworatzek*, ¶ 23. In contrast, *Audi System* discloses a liquid filter for a vehicle engine. *See* Champion’s Final Invalidity Contentions, Ex. C-2, p. 1. A person of skill in the art would not be motivated to combine structure from the engine oil filter of *Audi System* with the air filter of *Dworatzek*.

B. Response to Champion’s 35 U.S.C. § 112 Contentions Under LPR 2.3(b)(4)

Champion asserts that the recitation “second positioning means” renders Claim 15 invalid due to (1) enablement under pre-AIA 35 U.S.C. § 112, first paragraph; (2) adequate written description under pre-AIA 35 U.S.C. § 112, first paragraph; (3) fails to point out and distinctly claim the invention under pre-AIA 35 U.S.C. § 112, second paragraph; and (4) fails to identify the subject matter that the applicant regards as the invention under pre-AIA 35 U.S.C. § 112, second paragraph. Champion also generally asserts that Claim 24 is rendered invalid due to the recitation “the lower front panel.” Hengst contends that these specific assertions identified by Defendant do not render any of the claims of the ‘203 Patent invalid under 35 U.S.C. § 112.

With respect to Champion’s first contention related to enablement, Hengst submits that a person of skill in the art could make or use the invention “without undue experimentation.” *United States v. Telectronics, Inc.*, 857 F.2d 778, 785, 8 USPQ2d 1217, 1223 (Fed. Cir. 1988) (“The test of enablement is whether one reasonably skilled in the art could make or use the invention from the disclosures in the patent coupled with information known in the art without undue experimentation”). The “second positioning means” are described in Claim 15 as “being [one] of the inclined plane and the protruding nose.” ‘203 Patent, Claim 15. Both the inclined plane and

the protruding nose are described throughout the Specification and shown in the Figures so as to enable a person having skill in the art to make or use the invention without undue experimentation. *See, e.g.*, ‘203 Patent, col. 3-4 and 7-14; Fig. 7-8.

Next, under the written description requirement, a patent specification must describe the claimed invention in sufficient detail that one skilled in the art can reasonably conclude that the inventor had possession of the claimed invention. *See Moba, B.V. v. Diamond Automation, Inc.*, 325 F.3d 1306, 1319, 66 USPQ2d 1429, 1438 (Fed. Cir. 2003). Likewise here, Champion’s assertions are easily dispelled. Both the inclined plane and the protruding nose are described throughout the Specification and shown in the Figures such that the inventor had possession of the claimed invention and, specifically, the structure and function of the “second positioning means.” *See, e.g.*, ‘203 Patent, col. 3-4 and 7-14; Fig. 7-8.

Third, Champion contends that Claim 15 is indefinite because the claim fails to point out and distinctly claim the invention under pre-AIA 35 U.S.C. § 112, second paragraph, due to the recitation “second positioning means.” Here, a person having skill in the art would understand what is claimed when the claim is read in light of the specification. *Power-One, Inc. v. Artesyn Techs., Inc.*, 599 F.3d 1343, 1350, 94 USPQ2d 1241, 1245 (Fed. Cir. 2010). As detailed above, the second positioning means are repeatedly described throughout the Specification and Figures. *See, e.g.*, ‘203 Patent, col. 3-4 and 7-14; Fig. 7-8. Accordingly, Champion’s third invalidity basis under 35 U.S.C. § 112 is easily dispelled.

Champion also contends that Claim 15 fails to identify the subject matter that the applicant regards as the invention under pre-AIA 35 U.S.C. § 112, second paragraph, due to the recitation “second positioning means.” *See In re Zahn*, 617 F.2d 261, 204 USPQ 988 (CCPA 1980). Champion has not provided a specific basis or facts as to its contention here, but Hengst asserts

that the '203 Patent consistently and sufficiently describes the “second positioning means” such that all subject matter identified as the invention is disclosed.

Finally, Champion appears to generally assert that Claim 24 is invalid for indefiniteness due to the claim limitation “the lower front panel.” It is unclear as to what basis under 35 U.S.C. § 112 Champion is asserting with respect to Claim 24. Nevertheless, Hengst asserts that Claim 24 is not invalid under either pre-AIA 35 U.S.C. § 112, first paragraph or pre-AIA 35 U.S.C. § 112, second paragraph.

III. Local Patent Rule 3.4

Pursuant to Local Patent Rule 3.4, Hengst reserves the right to identify grounds for unenforceability of the asserted patents after receiving discovery from Champion.

Dated this 13th day of February 2024.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of February 2024, I electronically served the foregoing document on all counsel of record for the parties in this matter via email at the below email addresses:

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Exhibit 1

**TO HENGST'S LOCAL PATENT RULE 3.2 RESPONSE
TO FINAL INVALIDITY CONTENTIONS**

Exhibit 1 – Response to Champion’s Final Invalidity Contentions Ex. C-1

U.S. Patent Application Publication No. 20120261326 to Deschamps et al. (“*Deschamps*”) is not prior art over the ‘203 Patent under pre-AIA 35 U.S.C. § 102. Specifically, *Deschamps* does not qualify as prior art of the ‘203 Patent under pre-AIA 35 U.S.C. § 102(e) since the World Intellectual Property Organization (WIPO) publication was not in English. Manual of Patent Examining Procedure § 2136. Champion has failed to identify a specific provision of 35 U.S.C. § 102 as to which *Deschamps* is prior art, and Hengst contends that *Deschamps* fails to qualify as prior art over the ‘203 Patent under any section of pre-AIA 35 U.S.C. § 102. If Champion provides clear and convincing evidence showing that *Deschamps* qualifies as prior art over the ‘203 Patent, Hengst will provide an amended Exhibit 1.

Claim 15 of U.S. Patent No. 9,023,203	Asserted Exhibit C-1 35 U.S.C. § 102 Basis
[15.pre] A hollow-cylindrical filter material body surrounded on front sides by top and bottom front panels and which can be replaceably arranged in a filter housing,	<i>Deschamps</i> is not prior art under pre-AIA 35 U.S.C. § 102. Accordingly, Hengst denies that the claimed element is rendered invalid by <i>Deschamps</i> .
[15.a] an eccentric blocking element arranged on the bottom front panel for engaging an eccentric opening in the filter housing,	<i>Deschamps</i> is not prior art under pre-AIA 35 U.S.C. § 102. Accordingly, Hengst denies that the claimed element is rendered invalid by <i>Deschamps</i> .
[15.b] first positioning means on the ring filter insert, which interact with second positioning means on the filter housing when the ring filter insert is inserted into the filter housing and which are arranged to bring the blocking element into engagement with the eccentric opening,	<i>Deschamps</i> is not prior art under pre-AIA 35 U.S.C. § 102. Accordingly, Hengst denies that the claimed element is rendered invalid by <i>Deschamps</i> .
[15.c] the first positioning means being one of an inclined plane and a protruding nose, with the second positioning means being the other of the inclined plane and the protruding nose,	<p><i>Deschamps</i> is not prior art under pre-AIA 35 U.S.C. § 102. Accordingly, Hengst denies that the claimed element is rendered invalid by <i>Deschamps</i>.</p> <p>While <i>Deschamps</i> appears to disclose a guide contour 14, this element does not disclose the inclined plane of the ‘203 Patent as described and shown in the Specification and Figures.</p>
[15.d] the inclined plane and the nose arranged to be moved in relation to each other in such a way that they slide along each other and bring the blocking element into engagement with the eccentric opening, by rotating the ring filter insert relative to the filter housing,	<i>Deschamps</i> is not prior art under pre-AIA 35 U.S.C. § 102. Accordingly, Hengst denies that the claimed element is rendered invalid by <i>Deschamps</i> .

[15.e] the first positioning means being one of embodied and arranged on an inner circumference of the ring filter insert.	<i>Deschamps</i> is not prior art under pre-AIA 35 U.S.C. § 102. Accordingly, Hengst denies that the claimed element is rendered invalid by <i>Deschamps</i> .
Claim 16 of U.S. Patent No. 9,023,203	
[16] The ring filter insert according to claim 15, wherein the inclined plane is formed by two partial planes which run towards each other in opposite directions and which in each case extend across half of an inner circumference of the ring filter insert.	<i>Deschamps</i> is not prior art under pre-AIA 35 U.S.C. § 102. Accordingly, Hengst denies that the claimed element is rendered invalid by <i>Deschamps</i> .
Claim 17 of U.S. Patent No. 9,023,203	
[17] The ring filter insert according to claim 15, including a guide for the nose which runs in an axial direction and is connected to a lower end of the inclined plane.	<i>Deschamps</i> is not prior art under pre-AIA 35 U.S.C. § 102. Accordingly, Hengst denies that the claimed element is rendered invalid by <i>Deschamps</i> .
Claim 19 of U.S. Patent No. 9,023,203	
[19] The ring filter insert according to claim 15, wherein the inclined plane is formed by one of a radially protruding rib and step which forms a contact surface for the nose on one of an upper or lower side thereof.	<i>Deschamps</i> is not prior art under pre-AIA 35 U.S.C. § 102. Accordingly, Hengst denies that the claimed element is rendered invalid by <i>Deschamps</i> .
Claim 23 of U.S. Patent No. 9,023,203	
[23] The ring filter insert according to claim 15, wherein the nose is formed integrally with the bottom front panel of the ring filter insert.	<i>Deschamps</i> is not prior art under pre-AIA 35 U.S.C. § 102. Accordingly, Hengst denies that the claimed element is rendered invalid by <i>Deschamps</i> .
Claim 24 of U.S. Patent No. 9,023,203	
[24] The ring filter insert according to claim 15, wherein the blocking element is one of a radially sealing valve element, an axially sealing valve element, and a radially sealing plug which is one of rigidly connected to the lower front panel and rigidly arranged on the lower front panel.	<i>Deschamps</i> is not prior art under pre-AIA 35 U.S.C. § 102. Accordingly, Hengst denies that the claimed element is rendered invalid by <i>Deschamps</i> .
Claim 25 of U.S. Patent No. 9,023,203	
[25] The ring filter insert according to claim 15, wherein the blocking element is an axially sealing valve element which is elastically arranged on the bottom front panel.	<i>Deschamps</i> is not prior art under pre-AIA 35 U.S.C. § 102. Accordingly, Hengst denies that the claimed element is rendered invalid by <i>Deschamps</i> .
Claim 28 of U.S. Patent No. 9,023,203	
[28] The ring filter insert according to claim 15, wherein the blocking element is formed	<i>Deschamps</i> is not prior art under pre-AIA 35 U.S.C. § 102. Accordingly, Hengst denies that

from two parts, the two parts of the blocking element being engaged with each other in a manner allowing a compensation of radial dimension tolerances and angle errors.	the claimed element is rendered invalid by <i>Deschamps</i> .
Claim 29 of U.S. Patent No. 9,023,203	
[29] The liquid filter according to claim 1, wherein the protruding nose protrudes radially.	<i>Deschamps</i> is not prior art under pre-AIA 35 U.S.C. § 102. Accordingly, Hengst denies that the claimed element is rendered invalid by <i>Deschamps</i> .
Claim 30 of U.S. Patent No. 9,023,203	
[30] The ring filter insert according to claim 15, wherein the protruding nose protrudes radially.	<i>Deschamps</i> is not prior art under pre-AIA 35 U.S.C. § 102. Accordingly, Hengst denies that the claimed element is rendered invalid by <i>Deschamps</i> .

Exhibit 2

**TO HENGST'S LOCAL PATENT RULE 3.2 RESPONSE
TO FINAL INVALIDITY CONTENTIONS**

Exhibit 2 – Response to Champion’s Final Invalidity Contentions Ex. C-2

Exhibit C-2 of Champion’s alleges invalidity of certain claims of the ‘203 Patent obviousness over JP 2004-136203 (“*Yokoyama*”) in view of the Audi engine oil filter system implemented in 2007-2011 4.2L V8 A/T Quattro Audi A6, 2006-2012 4.2L V8 A/T Quattro Audi A8 and A8L, and 2007-2009 4.2L V8 A/T Premium Audi Q7 (“*Audi System*”).

The below applies to all claims as interpreted and responded to in the following chart:

Hengst asserts that the materials provided by Champion are insufficient to establish that *Audi System* is prior art over the ‘203 Patent. See Hengst’s Response to Champion’s Final Invalidity Contentions, p. 3.

Hengst denies that *Grass* describes the functionality of *Audi System*. See Hengst’s Response to Champion’s Final Invalidity Contentions, p. 4. Hengst denies that *Grass* would provide a person having ordinary skill in the art motivation to combine *Yokoyama* and *Audi System*.

Hengst denies that *Baumann* describes the functionality of *Audi System*. See Hengst’s Response to Champion’s Final Invalidity Contentions, p. 4. Hengst denies that *Baumann* would provide a person having ordinary skill in the art motivation to combine *Yokoyama* and *Audi System*.

Claim 15 of U.S. Patent No. 9,023,203	
[15.pre] A hollow-cylindrical filter material body surrounded on front sides by top and bottom front panels and which can be replaceably arranged in a filter housing,	Hengst admits <i>Yokoyama</i> discloses a hollow-cylindrical filter material body surrounded on front sides by top and bottom front panels and which can be replaceably arranged in a filter housing.
[15.a] an eccentric blocking element arranged on the bottom front panel for engaging an eccentric opening in the filter housing,	<p>Hengst denies that <i>Yokoyama</i> discloses an eccentric blocking element arranged on the bottom front panel for engaging an eccentric opening in the filter housing.</p> <p>Hengst denies that <i>Audi System</i> discloses an eccentric blocking element for the eccentric opening arranged on the bottom front panel. The materials provided by Champion do not provide clarity as to what Champion asserts is the eccentric blocking element of the Audi System. Additionally, although an image on the Audi website appears to show an eccentric structure, the schematics from the Audi website show a filter element without any blocking element or structure that could be reasonably understood as such. CL008480-CL008483.</p>

<p>[15.b] first positioning means on the ring filter insert, which interact with second positioning means on the filter housing when the ring filter insert is inserted into the filter housing and which are arranged to bring the blocking element into engagement with the eccentric opening,</p>	<p>Hengst denies that <i>Yokoyama</i> discloses first positioning means on the ring filter insert, which interact with second positioning means on the filter housing when the ring filter insert is inserted into the filter housing and which are arranged to bring the blocking element into engagement with the eccentric opening. <i>Yokoyama</i> discloses no structure that is arranged to bring a blocking element into engagement with an eccentric opening. See <i>Yokoyama</i>, FIGS. 1-2.</p> <p>Hengst denies that <i>Audi System</i> discloses first positioning means on the ring filter insert, which interact with second positioning means on the filter housing when the ring filter insert is inserted into the filter housing and which are arranged to bring the blocking element into engagement with the eccentric opening. <i>Audi System</i> does not appear to disclose a blocking element. If an eccentric blocking element were disclosed by <i>Audi System</i>, it would not be arranged to be brought into engagement with an eccentric opening via the protrusions 46 of <i>Yokoyama</i>.</p>
<p>[15.c] the first positioning means being one of an inclined plane and a protruding nose, with the second positioning means being the other of the inclined plane and the protruding nose,</p>	<p>Hengst admits <i>Yokoyama</i> discloses first positioning means comprising a protruding nose.</p>
<p>[15.d] the inclined plane and the nose arranged to be moved in relation to each other in such a way that they slide along each other and bring the blocking element into engagement with the eccentric opening, by rotating the ring filter insert relative to the filter housing,</p>	<p>Hengst denies that <i>Yokoyama</i> discloses the inclined plane and the nose arranged to be moved in relation to each other in such a way that they slide along each other and bring the blocking element into engagement with the eccentric opening, by rotating the ring filter insert relative to the filter housing. <i>Yokoyama</i> discloses no structure that is arranged to bring a blocking element into engagement with an eccentric opening. See <i>Yokoyama</i>, FIGS. 1-2. Moreover, the filter element 40 “does not rotate” when the case halves are coupled. See <i>Yokoyama</i>, ¶ 8.</p> <p>Hengst denies that <i>Audi System</i> discloses the inclined plane and the nose arranged to be moved in relation to each other in such a way</p>

	that they slide along each other and bring the blocking element into engagement with the eccentric opening, by rotating the ring filter insert relative to the filter housing. <i>Audi System</i> does not appear to disclose a blocking element. If an eccentric blocking element were disclosed by <i>Audi System</i> , it would not be arranged to be brought into engagement with an eccentric opening via the protrusions 46 of <i>Yokoyama</i> .
[15.e] the first positioning means being one of embodied and arranged on an inner circumference of the ring filter insert.	Hengst admits that <i>Yokoyama</i> discloses the first positioning means being one of embodied and arranged on an inner circumference of the ring filter insert.
Claim 16 of U.S. Patent No. 9,023,203	
[16] The ring filter insert according to claim 15, wherein the inclined plane is formed by two partial planes which run towards each other in opposite directions and which in each case extend across half of an inner circumference of the ring filter insert.	Hengst denies that <i>Yokoyama</i> discloses wherein the inclined plane is formed by two partial planes which run towards each other in opposite directions and which in each case extend across half of an inner circumference of the ring filter insert. Portions 19 do not extend across half of a filter housing part arranged inside the ring filter insert. See <i>Yokoyama</i> , FIGS. 1-2.
Claim 17 of U.S. Patent No. 9,023,203	
[17] The ring filter insert according to claim 15, including a guide for the nose which runs in an axial direction and is connected to a lower end of the inclined plane.	Hengst denies that <i>Yokoyama</i> discloses a guide for the nose which runs in an axial direction and is connected to a lower end of the inclined plane. Portions 19 do not extend across half of a filter housing part arranged inside the ring filter insert. See <i>Yokoyama</i> , FIGS. 1-2.
Claim 19 of U.S. Patent No. 9,023,203	
[19] The ring filter insert according to claim 15, wherein the inclined plane is formed by one of a radially protruding rib and step which forms a contact surface for the nose on one of an upper or lower side thereof.	Hengst admits that <i>Yokoyama</i> discloses wherein the inclined plane is formed by one of a radially protruding rib and step which forms a contact surface for the nose on one of an upper or lower side thereof.
Claim 23 of U.S. Patent No. 9,023,203	
[23] The ring filter insert according to claim 15, wherein the nose is formed integrally with the bottom front panel of the ring filter insert.	Hengst denies that <i>Yokoyama</i> discloses wherein the nose is formed integrally with the bottom front panel of the ring filter insert.

	Protrusions 46 are disposed on upper plate 43. See <i>Yokoyama</i> , FIGS. 1-2.
Claim 24 of U.S. Patent No. 9,023,203	
[24] The ring filter insert according to claim 15, wherein the blocking element is one of a radially sealing valve element, an axially sealing valve element, and a radially sealing plug which is one of rigidly connected to the lower front panel and rigidly arranged on the lower front panel.	<p>Hengst denies that <i>Yokoyama</i> discloses wherein the blocking element is one of a radially sealing valve element, an axially sealing valve element, and a radially sealing plug which is one of rigidly connected to the lower front panel and rigidly arranged on the lower front panel.</p> <p>Hengst denies that <i>Audi System</i> discloses wherein the blocking element is one of a radially sealing valve element, an axially sealing valve element, and a radially sealing plug which is one of rigidly connected to the lower front panel and rigidly arranged on the lower front panel. Hengst denies that <i>Audi System</i> discloses an eccentric blocking element. The materials provided by Champion do not provide clarity as to what Champion asserts is the eccentric blocking element of the Audi System. Additionally, although an image on the Audi website appears to show an eccentric structure, the schematics from the Audi website show a filter element without any blocking element or structure that could be reasonably understood as such. CL008480-CL008483.</p>
Claim 25 of U.S. Patent No. 9,023,203	
[25] The ring filter insert according to claim 15, wherein the blocking element is an axially sealing valve element which is elastically arranged on the bottom front panel.	<p>Hengst denies that <i>Yokoyama</i> discloses wherein the blocking element is an axially sealing valve element which is elastically arranged on the bottom front panel. The materials provided by Champion do not provide clarity as to what Champion asserts is the eccentric blocking element of the Audi System. Additionally, although an image on the Audi website appears to show an eccentric structure, the schematics from the Audi website show a filter element without any blocking element or structure that could be reasonably understood as such. CL008480-CL008483.</p>
Claim 28 of U.S. Patent No. 9,023,203	

<p>[28] The ring filter insert according to claim 15, wherein the blocking element is formed from two parts, the two parts of the blocking element being engaged with each other in a manner allowing a compensation of radial dimension tolerances and angle errors.</p>	<p>Hengst denies that <i>Yokoyama</i> discloses wherein the blocking element is formed from two parts, the two parts of the blocking element being engaged with each other in a manner allowing a compensation of radial dimension tolerances and angle errors.</p> <p>Hengst denies that <i>Audi System</i> discloses wherein the blocking element is formed from two parts, the two parts of the blocking element being engaged with each other in a manner allowing a compensation of radial dimension tolerances and angle errors. The materials provided by Champion do not provide clarity as to what Champion asserts is the eccentric blocking element of the Audi System. Additionally, although an image on the Audi website appears to show an eccentric structure, the schematics from the Audi website show a filter element without any blocking element or structure that could be reasonably understood as such. CL008480-CL008483.</p>
<p>Claim 29 of U.S. Patent No. 9,023,203</p>	
<p>[29] The liquid filter according to claim 1, wherein the protruding nose protrudes radially.</p>	<p>Hengst admits that <i>Yokoyama</i> discloses wherein the protruding nose protrudes radially.</p>
<p>Claim 30 of U.S. Patent No. 9,023,203</p>	
<p>[30] The ring filter insert according to claim 15, wherein the protruding nose protrudes radially.</p>	<p>Hengst admits that <i>Yokoyama</i> discloses wherein the protruding nose protrudes radially.</p>

Exhibit 3

**TO HENGST'S LOCAL PATENT RULE 3.2 RESPONSE
TO FINAL INVALIDITY CONTENTIONS**

Exhibit 3 – Response to Champion’s Final Invalidity Contentions Ex. C-3

Exhibit C-3 of Champion’s alleges invalidity of certain claims of the ‘203 Patent obviousness over WO 2008134494 (“*Honermann*”) in view of the Audi engine oil filter system implemented in 2007-2011 4.2L V8 A/T Quattro Audi A6, 2006-2012 4.2L V8 A/T Quattro Audi A8 and A8L, and 2007-2009 4.2L V8 A/T Premium Audi Q7 (“*Audi System*”).

The below applies to all claims as interpreted and responded to in the following chart:

Hengst asserts that the materials provided by Champion are insufficient to establish that *Audi System* is prior art over the ‘203 Patent. See Hengst’s Response to Champion’s Final Invalidity Contentions, p. 3.

Hengst denies that *Grass* describes the functionality of *Audi System*. See Hengst’s Response to Champion’s Final Invalidity Contentions, p. 4. Hengst denies that *Grass* would provide a person having ordinary skill in the art motivation to combine *Yokoyama* and *Audi System*.

Hengst denies that *Baumann* describes the functionality of *Audi System*. See Hengst’s Response to Champion’s Final Invalidity Contentions, p. 4. Hengst denies that *Baumann* would provide a person having ordinary skill in the art motivation to combine *Yokoyama* and *Audi System*.

Claim 15 of U.S. Patent No. 9,023,203	Asserted Exhibit C-3 35 U.S.C. § 103 Basis
[15.pre] A hollow-cylindrical filter material body surrounded on front sides by top and bottom front panels and which can be replaceably arranged in a filter housing,	Hengst admits <i>Honermann</i> discloses a hollow-cylindrical filter material body surrounded on front sides by top and bottom front panels and which can be replaceably arranged in a filter housing.
[15.a] an eccentric blocking element arranged on the bottom front panel for engaging an eccentric opening in the filter housing,	<p>Hengst denies that <i>Honermann</i> discloses an eccentric blocking element arranged on the bottom front panel for engaging an eccentric opening in the filter housing</p> <p>Hengst denies that <i>Audi System</i> discloses an eccentric blocking element for the eccentric opening arranged on the bottom front panel. The materials provided by Champion do not provide clarity as to what Champion asserts is the eccentric blocking element of the Audi System. Additionally, although an image on the Audi website appears to show an eccentric structure, the schematics from the Audi website show a filter element without any blocking element or structure that could be reasonably understood as such. CL008480-CL008483.</p>

<p>[15.b] first positioning means on the ring filter insert, which interact with second positioning means on the filter housing when the ring filter insert is inserted into the filter housing and which are arranged to bring the blocking element into engagement with the eccentric opening,</p>	<p>Hengst denies that <i>Honermann</i> discloses first positioning means on the ring filter insert, which interact with second positioning means on the filter housing when the ring filter insert is inserted into the filter housing and which are arranged to bring the blocking element into engagement with the eccentric opening. <i>Honermann</i> discloses no structure that is arranged to bring a blocking element into engagement with an eccentric opening. See <i>Honermann</i>, FIGS. 23-24.</p> <p>Hengst denies that <i>Audi System</i> discloses first positioning means on the ring filter insert, which interact with second positioning means on the filter housing when the ring filter insert is inserted into the filter housing and which are arranged to bring the blocking element into engagement with the eccentric opening. <i>Audi System</i> does not appear to disclose a blocking element. If an eccentric blocking element were disclosed by <i>Audi System</i>, it would not be arranged to be brought into engagement with via the two opposing protrusions 122, 124 of <i>Honermann</i>.</p>
<p>[15.c] the first positioning means being one of an inclined plane and a protruding nose, with the second positioning means being the other of the inclined plane and the protruding nose,</p>	<p>Hengst admits <i>Honermann</i> discloses first positioning means comprising a protruding nose.</p>
<p>[15.d] the inclined plane and the nose arranged to be moved in relation to each other in such a way that they slide along each other and bring the blocking element into engagement with the eccentric opening, by rotating the ring filter insert relative to the filter housing,</p>	<p>Hengst denies that <i>Honermann</i> discloses the inclined plane and the nose arranged to be moved in relation to each other in such a way that they slide along each other and bring the blocking element into engagement with the eccentric opening, by rotating the ring filter insert relative to the filter housing. <i>Honermann</i> discloses no structure that is arranged to bring a blocking element into engagement with an eccentric opening. See <i>Honermann</i>, FIGS. 23-24.</p> <p>Hengst denies that <i>Audi System</i> discloses first positioning means on the ring filter insert, which interact with second positioning means on the filter housing when the ring filter insert is inserted into the filter housing and which are</p>

	arranged to bring the blocking element into engagement with the eccentric opening. <i>Audi System</i> does not appear to disclose a blocking element. If an eccentric blocking element were disclosed by <i>Audi System</i> , it would not be arranged to be brought into engagement with via the two opposing protrusions 122, 124 of <i>Honermann</i> .
[15.e] the first positioning means being one of embodied and arranged on an inner circumference of the ring filter insert.	Hengst admits that <i>Honermann</i> discloses the first positioning means being one of embodied and arranged on an inner circumference of the ring filter insert.
Claim 16 of U.S. Patent No. 9,023,203	
[16] The ring filter insert according to claim 15, wherein the inclined plane is formed by two partial planes which run towards each other in opposite directions and which in each case extend across half of an inner circumference of the ring filter insert.	Hengst denies that <i>Honermann</i> discloses wherein the inclined plane is formed by two partial planes which run towards each other in opposite directions and which in each case extend across half of an inner circumference of the ring filter insert. Slide surfaces 318 do not extend across half of a circumference of a filter housing part arranged inside the ring filter insert. See <i>Honermann</i> , FIG. 24
Claim 17 of U.S. Patent No. 9,023,203	
[17] The ring filter insert according to claim 15, including a guide for the nose which runs in an axial direction and is connected to a lower end of the inclined plane.	Hengst admits that <i>Honermann</i> discloses a guide for the nose which runs in an axial direction and is connected to a lower end of the inclined plane.
Claim 19 of U.S. Patent No. 9,023,203	
[19] The ring filter insert according to claim 15, wherein the inclined plane is formed by one of a radially protruding rib and step which forms a contact surface for the nose on one of an upper or lower side thereof.	Hengst admits that <i>Honermann</i> discloses wherein the inclined plane is formed by one of a radially protruding rib and step which forms a contact surface for the nose on one of an upper or lower side thereof.
Claim 23 of U.S. Patent No. 9,023,203	
[23] The ring filter insert according to claim 15, wherein the nose is formed integrally with the bottom front panel of the ring filter insert.	Hengst denies that <i>Honermann</i> discloses wherein the nose is formed integrally with the bottom front panel of the ring filter insert. Protrusions 121 are disposed on upper end cap 41. See <i>Honermann</i> , FIG. 30.
Claim 24 of U.S. Patent No. 9,023,203	
[24] The ring filter insert according to claim 15, wherein the blocking element is one of a	Hengst denies that <i>Honermann</i> discloses wherein the blocking element is one of a

<p>radially sealing valve element, an axially sealing valve element, and a radially sealing plug which is one of rigidly connected to the lower front panel and rigidly arranged on the lower front panel.</p>	<p>radially sealing valve element, an axially sealing valve element, and a radially sealing plug which is one of rigidly connected to the lower front panel and rigidly arranged on the lower front panel.</p> <p>Hengst denies that <i>Audi System</i> discloses wherein the blocking element is one of a radially sealing valve element, an axially sealing valve element, and a radially sealing plug which is one of rigidly connected to the lower front panel and rigidly arranged on the lower front panel. Hengst denies that <i>Audi System</i> discloses an eccentric blocking element. The materials provided by Champion do not provide clarity as to what Champion asserts is the eccentric blocking element of the Audi System. Additionally, although an image on the Audi website appears to show an eccentric structure, the schematics from the Audi website show a filter element without any blocking element or structure that could be reasonably understood as such. CL008480-CL008483.</p>
<p>Claim 25 of U.S. Patent No. 9,023,203</p>	
<p>[25] The ring filter insert according to claim 15, wherein the blocking element is an axially sealing valve element which is elastically arranged on the bottom front panel.</p>	<p>Hengst denies that <i>Honermann</i> discloses wherein the blocking element is an axially sealing valve element which is elastically arranged on the bottom front panel.</p> <p>Hengst denies that <i>Audi System</i> discloses wherein the blocking element is an axially sealing valve element which is elastically arranged on the bottom front panel. Hengst denies that <i>Audi System</i> discloses an eccentric blocking element. The materials provided by Champion do not provide clarity as to what Champion asserts is the eccentric blocking element of the Audi System. Additionally, although an image on the Audi website appears to show an eccentric structure, the schematics from the Audi website show a filter element without any blocking element or structure that could be reasonably understood as such. CL008480-CL008483.</p>

Claim 28 of U.S. Patent No. 9,023,203	
<p>[28] The ring filter insert according to claim 15, wherein the blocking element is formed from two parts, the two parts of the blocking element being engaged with each other in a manner allowing a compensation of radial dimension tolerances and angle errors.</p>	<p>Hengst denies that <i>Honermann</i> discloses wherein the blocking element is formed from two parts, the two parts of the blocking element being engaged with each other in a manner allowing a compensation of radial dimension tolerances and angle errors.</p> <p>Hengst denies that <i>Audi System</i> discloses wherein the blocking element is formed from two parts, the two parts of the blocking element being engaged with each other in a manner allowing a compensation of radial dimension tolerances and angle errors. Hengst denies that <i>Audi System</i> discloses an eccentric blocking element. The materials provided by Champion do not provide clarity as to what Champion asserts is the eccentric blocking element of the Audi System. Additionally, although an image on the Audi website appears to show an eccentric structure, the schematics from the Audi website show a filter element without any blocking element or structure that could be reasonably understood as such. CL008480-CL008483.</p>
Claim 29 of U.S. Patent No. 9,023,203	
<p>[29] The liquid filter according to claim 1, wherein the protruding nose protrudes radially.</p>	<p>Hengst admits that <i>Honermann</i> discloses wherein the protruding nose protrudes radially.</p>
Claim 30 of U.S. Patent No. 9,023,203	
<p>[30] The ring filter insert according to claim 15, wherein the protruding nose protrudes radially.</p>	<p>Hengst admits that <i>Honermann</i> discloses wherein the protruding nose protrudes radially.</p>

Exhibit 4

**TO HENGST'S LOCAL PATENT RULE 3.2 RESPONSE
TO FINAL INVALIDITY CONTENTIONS**

Exhibit 4 – Response to Champion’s Final Invalidity Contentions Ex. C-4

Exhibit C-4 of Champion’s alleges invalidity of certain claims of the ‘203 Patent obviousness over U.S. 2006/0219621 (“*Dworatzek*”) in view of the Audi engine oil filter system implemented in 2007-2011 4.2L V8 A/T Quattro Audi A6, 2006-2012 4.2L V8 A/T Quattro Audi A8 and A8L, and 2007-2009 4.2L V8 A/T Premium Audi Q7 (“*Audi System*”).

The below applies to all claims as interpreted and responded to in the following chart:

Hengst asserts that the materials provided by Champion are insufficient to establish that *Audi System* is prior art over the ‘203 Patent. See Hengst’s Response to Champion’s Final Invalidity Contentions, p. 3.

Hengst denies that *Grass* describes the functionality of *Audi System*. See Hengst’s Response to Champion’s Final Invalidity Contentions, p. 4. Hengst denies that *Grass* would provide a person having ordinary skill in the art motivation to combine *Yokoyama* and *Audi System*.

Hengst denies that *Baumann* describes the functionality of *Audi System*. See Hengst’s Response to Champion’s Final Invalidity Contentions, p. 4. Hengst denies that *Baumann* would provide a person having ordinary skill in the art motivation to combine *Yokoyama* and *Audi System*.

Claim 15 of U.S. Patent No. 9,023,203	
[15.pre] A hollow-cylindrical filter material body surrounded on front sides by top and bottom front panels and which can be replaceably arranged in a filter housing,	Hengst admits <i>Dworatzek</i> discloses a hollow-cylindrical filter material body surrounded on front sides by top and bottom front panels and which can be replaceably arranged in a filter housing.
[15.a] an eccentric blocking element arranged on the bottom front panel for engaging an eccentric opening in the filter housing,	<p>Hengst denies that <i>Dworatzek</i> discloses an eccentric blocking element arranged on the bottom front panel for engaging an eccentric opening in the filter housing</p> <p>Hengst denies that <i>Audi System</i> discloses an eccentric blocking element for the eccentric opening arranged on the bottom front panel. The materials provided by Champion do not provide clarity as to what Champion asserts is the eccentric blocking element of the Audi System. Additionally, although an image on the Audi website appears to show an eccentric structure, the schematics from the Audi website show a filter element without any blocking element or structure that could be reasonably understood as such. CL008480-CL008483.</p>

<p>[15.b] first positioning means on the ring filter insert, which interact with second positioning means on the filter housing when the ring filter insert is inserted into the filter housing and which are arranged to bring the blocking element into engagement with the eccentric opening,</p>	<p>Hengst denies that <i>Dworatzek</i> discloses first positioning means on the ring filter insert, which interact with second positioning means on the filter housing when the ring filter insert is inserted into the filter housing and which are arranged to bring the blocking element into engagement with the eccentric opening. <i>Dworatzek</i> discloses no structure that is arranged to bring a blocking element into engagement with an eccentric opening. See <i>Dworatzek</i>, FIG. 2-5.</p> <p>Hengst denies that <i>Audi System</i> discloses first positioning means on the ring filter insert, which interact with second positioning means on the filter housing when the ring filter insert is inserted into the filter housing and which are arranged to bring the blocking element into engagement with the eccentric opening. <i>Audi System</i> does not appear to disclose a blocking element. If an eccentric blocking element were disclosed by <i>Audi System</i>, it would not be arranged to be brought into engagement with an eccentric opening via the radially inwardly directed projections 26, 27, 28 of <i>Dworatzek</i>.</p>
<p>[15.c] the first positioning means being one of an inclined plane and a protruding nose, with the second positioning means being the other of the inclined plane and the protruding nose,</p>	<p>Hengst admits <i>Dworatzek</i> discloses first positioning means comprising a protruding nose.</p>
<p>[15.d] the inclined plane and the nose arranged to be moved in relation to each other in such a way that they slide along each other and bring the blocking element into engagement with the eccentric opening, by rotating the ring filter insert relative to the filter housing,</p>	<p>Hengst denies that <i>Dworatzek</i> discloses the inclined plane and the nose arranged to be moved in relation to each other in such a way that they slide along each other and bring the blocking element into engagement with the eccentric opening, by rotating the ring filter insert relative to the filter housing. <i>Dworatzek</i> discloses no structure that is arranged to bring a blocking element into engagement with an eccentric opening. See <i>Dworatzek</i>, FIG. 2-5. Moreover, <i>Dworatzek</i> fails to disclose rotating the ring filter insert relative to the filter housing. See <i>Dworatzek</i>, ¶ 30.</p> <p>Hengst denies that <i>Audi System</i> discloses first positioning means on the ring filter insert, which interact with second positioning means</p>

	<p>on the filter housing when the ring filter insert is inserted into the filter housing and which are arranged to bring the blocking element into engagement with the eccentric opening. <i>Audi System</i> does not appear to disclose a blocking element. If an eccentric blocking element were disclosed by <i>Audi System</i>, it would not be arranged to be brought into engagement with an eccentric opening via the radially inwardly directed projections 26, 27, 28 of <i>Dworatzek</i>.</p>
<p>[15.e] the first positioning means being one of embodied and arranged on an inner circumference of the ring filter insert.</p>	<p>Hengst denies that <i>Dworatzek</i> discloses the first positioning means being one of embodied and arranged on an inner circumference of the ring filter insert. Radially inwardly directed projections 26, 27, 28 are not embodied and arranged on filter element 12. See <i>Dworatzek</i>, FIG. 5.</p>
Claim 16 of U.S. Patent No. 9,023,203	
<p>[16] The ring filter insert according to claim 15, wherein the inclined plane is formed by two partial planes which run towards each other in opposite directions and which in each case extend across half of an inner circumference of the ring filter insert.</p>	<p>Hengst denies that <i>Dworatzek</i> discloses wherein the inclined plane is formed by two partial planes which run towards each other in opposite directions and which in each case extend across half of an inner circumference of the ring filter insert. Grooves 32, 33, 34 do not extend across half of a circumference of a filter housing part arranged inside the ring filter insert. See <i>Dworatzek</i>, FIG. 4A-B.</p>
Claim 17 of U.S. Patent No. 9,023,203	
<p>[17] The ring filter insert according to claim 15, including a guide for the nose which runs in an axial direction and is connected to a lower end of the inclined plane.</p>	<p>Hengst denies that <i>Dworatzek</i> discloses a guide for the nose which runs in an axial direction and is connected to a lower end of the inclined plane. The axial portion of groove 32 does not extend from a lower end of the incline. See <i>Dworatzek</i>, FIG. 4A-B</p>
Claim 19 of U.S. Patent No. 9,023,203	
<p>[19] The ring filter insert according to claim 15, wherein the inclined plane is formed by one of a radially protruding rib and step which forms a contact surface for the nose on one of an upper or lower side thereof.</p>	<p>Hengst denies that <i>Dworatzek</i> discloses wherein the inclined plane is formed by one of a radially protruding rib and step which forms a contact surface for the nose on one of an upper or lower side thereof. Grooves 32, 33, 34 are slots and are thus not radially protruding. See <i>Dworatzek</i>, FIG. 4A-B.</p>

Claim 23 of U.S. Patent No. 9,023,203	
[23] The ring filter insert according to claim 15, wherein the nose is formed integrally with the bottom front panel of the ring filter insert.	Hengst denies that <i>Dworatzek</i> discloses wherein the nose is formed integrally with the bottom front panel of the ring filter insert. Radially inwardly directed projections 26, 27, 28 are not embodied and arranged on filter element 12. See <i>Dworatzek</i> , FIG. 5.
Claim 24 of U.S. Patent No. 9,023,203	
[24] The ring filter insert according to claim 15, wherein the blocking element is one of a radially sealing valve element, an axially sealing valve element, and a radially sealing plug which is one of rigidly connected to the lower front panel and rigidly arranged on the lower front panel.	<p>Hengst denies that <i>Dworatzek</i> discloses wherein the blocking element is one of a radially sealing valve element, an axially sealing valve element, and a radially sealing plug which is one of rigidly connected to the lower front panel and rigidly arranged on the lower front panel.</p> <p>Hengst denies that <i>Audi System</i> discloses wherein the blocking element is one of a radially sealing valve element, an axially sealing valve element, and a radially sealing plug which is one of rigidly connected to the lower front panel and rigidly arranged on the lower front panel. Hengst denies that <i>Audi System</i> discloses an eccentric blocking element. The materials provided by Champion do not provide clarity as to what Champion asserts is the eccentric blocking element of the Audi System. Additionally, although an image on the Audi website appears to show an eccentric structure, the schematics from the Audi website show a filter element without any blocking element or structure that could be reasonably understood as such. CL008480-CL008483.</p>
Claim 25 of U.S. Patent No. 9,023,203	
[25] The ring filter insert according to claim 15, wherein the blocking element is an axially sealing valve element which is elastically arranged on the bottom front panel.	<p>Hengst denies that <i>Dworatzek</i> discloses wherein the blocking element is an axially sealing valve element which is elastically arranged on the bottom front panel.</p> <p>Hengst denies that <i>Audi System</i> discloses wherein the blocking element is an axially sealing valve element which is elastically arranged on the bottom front panel. Hengst denies that <i>Audi System</i> discloses an eccentric</p>

	<p>blocking element. The materials provided by Champion do not provide clarity as to what Champion asserts is the eccentric blocking element of the Audi System. Additionally, although an image on the Audi website appears to show an eccentric structure, the schematics from the Audi website show a filter element without any blocking element or structure that could be reasonably understood as such. CL008480-CL008483.</p>
Claim 28 of U.S. Patent No. 9,023,203	
<p>[28] The ring filter insert according to claim 15, wherein the blocking element is formed from two parts, the two parts of the blocking element being engaged with each other in a manner allowing a compensation of radial dimension tolerances and angle errors.</p>	<p>Hengst denies that <i>Dworatzek</i> discloses wherein the blocking element is formed from two parts, the two parts of the blocking element being engaged with each other in a manner allowing a compensation of radial dimension tolerances and angle errors.</p> <p>Hengst denies that <i>Audi System</i> discloses wherein the blocking element is formed from two parts, the two parts of the blocking element being engaged with each other in a manner allowing a compensation of radial dimension tolerances and angle errors. Hengst denies that <i>Audi System</i> discloses an eccentric blocking element. The materials provided by Champion do not provide clarity as to what Champion asserts is the eccentric blocking element of the Audi System. Additionally, although an image on the Audi website appears to show an eccentric structure, the schematics from the Audi website show a filter element without any blocking element or structure that could be reasonably understood as such. CL008480-CL008483.</p>
Claim 29 of U.S. Patent No. 9,023,203	
<p>[29] The liquid filter according to claim 1, wherein the protruding nose protrudes radially.</p>	<p>Hengst admits that <i>Dworatzek</i> discloses wherein the protruding nose protrudes radially.</p>
Claim 30 of U.S. Patent No. 9,023,203	
<p>[30] The ring filter insert according to claim 15, wherein the protruding nose protrudes radially.</p>	<p>Hengst admits that <i>Dworatzek</i> discloses wherein the protruding nose protrudes radially.</p>