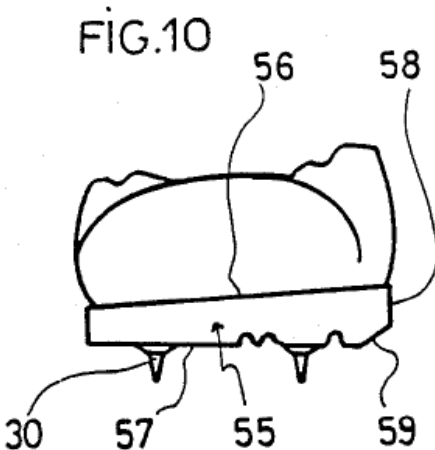
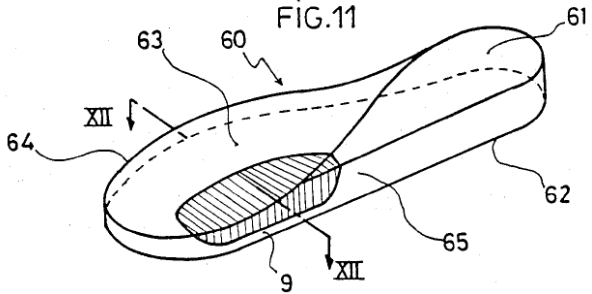
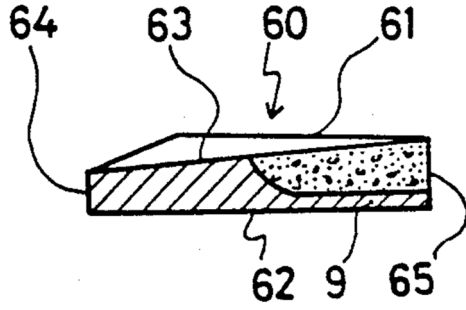


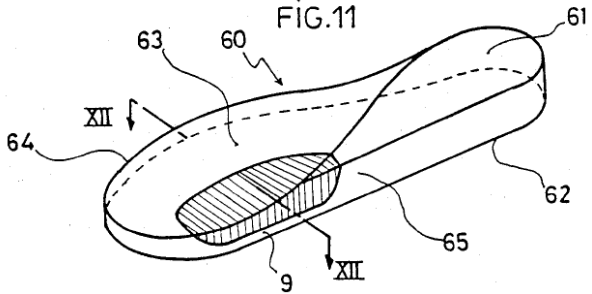
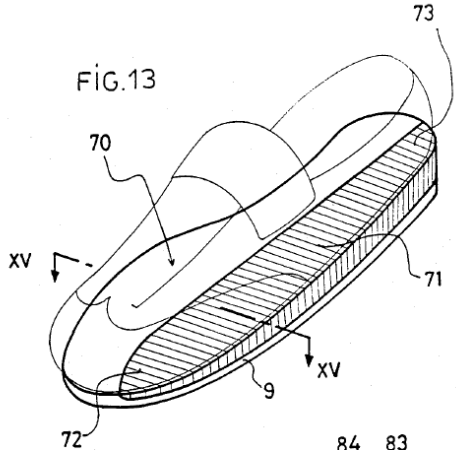
EXHIBIT I – U.S. Patent No. 10,674,786 in View of U.S. Patent No. 4,754,561

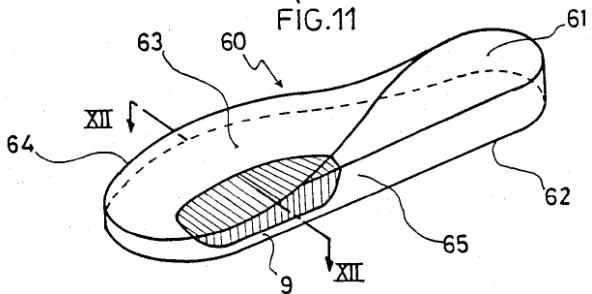
U.S. Patent No. 4,754,561 (the “’561 patent”) issued on July 5, 1988. It therefore constitutes prior art under at least pre-AIA 35 U.S.C. § 102(b). As shown below, the ’561 patent anticipates and/or renders obvious claims 1-8 of US Patent 10,674,786. To the extent Athalonz contends the ’561 patent does not anticipate a particular claim, the ’561 patent also renders the claim obvious for the reasons discussed in the ’786 Patent Obviousness Chart (Exhibit T).

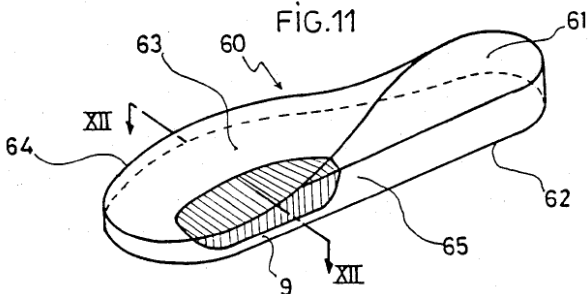
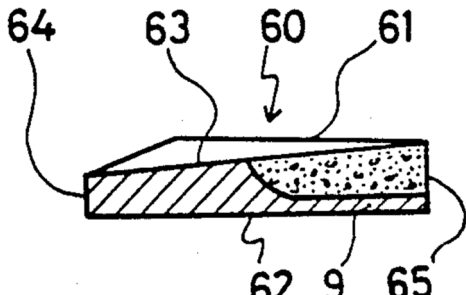
These invalidity contentions are based on Under Armour’s present understanding of the asserted claims and Athalonz’s apparent construction of the claims in its September 14, 2023 Disclosure of Asserted Claims and Infringement Contentions, which is deficient at least insofar as it fails to cite any documents or identify accused structures, acts, or materials in the Accused Products with particularity. Under Armour does not agree with Athalonz’s application of the claims, or that the claims satisfy the requirements of 35 U.S.C. § 112. Under Armour’s contentions herein are not, and should in no way be seen as, admissions or adoptions as to any particular claim scope or construction, or as any admission that any particular element is met by any accused product in any particular way. Under Armour objects to any attempt to imply claim construction from this chart. Under Armour’s prior art invalidity contentions are made in a variety of alternatives and do not represent Under Armour’s agreement or view as to the meaning, definiteness, written description support for, or enablement of any claim contained therein.

U.S. Patent No. 10,674,786	U.S. Patent No. 4,754,561
1 [pre]. An apparatus comprises:	The ’561 patent discloses an apparatus.  FIG. 10 56 58 30 57 55 59

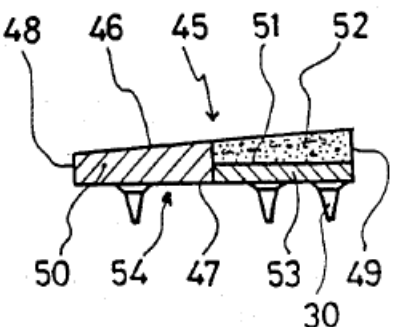
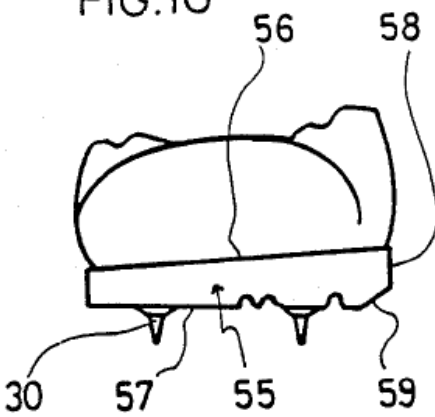
U.S. Patent No. 10,674,786	U.S. Patent No. 4,754,561
	“As assembled in FIG. 10, the sole 55 transversely has a plantar support surface 56 for the foot, providing the latter with a seating inclined with respect to the walking surface 57, as described above in reference to FIG. 9; conversely, in order to facilitate the rolling of the foot on the left outer edge 58 of the sole 55, an inclined plane 59, secant to the walking surface 57, is made on the lower side of said edge 58.” ’561 patent, 4:67-5:6.  “Provision is also made (FIGS. 11 and 12) for the sole 60 to furnish a transverse seating for the foot, having variations in the plantar support surface. As such, the plantar support zone 61 at the level of the heel remains substantially parallel to the walking surface 62, while the support surface 63 in the front area of the foot is inclined upwards from the inner edge 64 towards the outer edge 65.” ’561 patent, 5:7-14. FIG. 12 

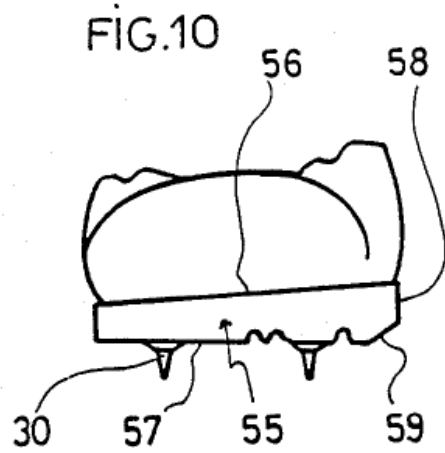
U.S. Patent No. 10,674,786	U.S. Patent No. 4,754,561
1[a] a heel platform section that has a uniform height from an outer edge to an inner edge of the apparatus at the rear edge of the apparatus, wherein the uniform height establishes a reference slope from the outer edge to the inner edge, the reference slope substantially parallel to a bottom surface of the apparatus;	The '561 patent discloses a heel platform section that has a uniform height from an outer edge to an inner edge of the apparatus at the rear edge of the apparatus, wherein the uniform height establishes a reference slope from the outer edge to the inner edge, the reference slope substantially parallel to a bottom surface of the apparatus.  “Provision is also made (FIGS. 11 and 12) for the sole 60 to furnish a transverse seating for the foot, having variations in the plantar support surface. As such, the plantar support zone 61 at the level of the heel remains substantially parallel to the walking surface 62, while the support surface 63 in the front area of the foot is inclined upwards from the inner edge 64 towards the outer edge 65.” '561 patent, 5:7-14. 

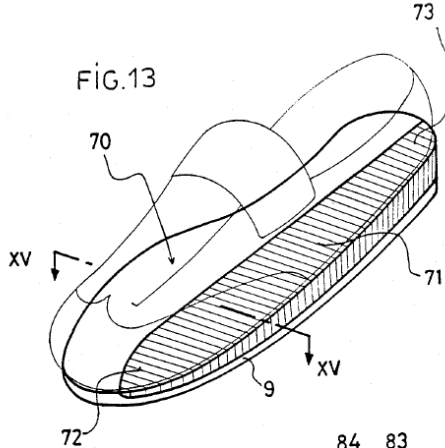
U.S. Patent No. 10,674,786	U.S. Patent No. 4,754,561
	“According to another embodiment, illustrated in FIG. 13, the sole 70 is provided with a shock absorbing element 71 which extends substantially from the front part 72 occupied by the 3rd, 4th and 5th phalanges of the foot up to the heel zone 73; this element 71 has a variable thickness so that the front part 72 is thinner than the part at the heel 73. In this example, the thick ness of the sole 70, seen in elevation in its longitudinal direction, also increases as it goes towards the heel Zone 73.” ’561 patent, 5:15-24.
1[b] a mid-foot section juxtaposed to the heel platform section; and	The ’561 patent discloses a mid-foot section juxtaposed to the heel platform section.  “Provision is also made (FIGS. 11 and 12) for the sole 60 to furnish a transverse seating for the foot, having variations in the plantar support surface. As such, the plantar support zone 61 at the level of the heel remains substantially parallel to the walking surface 62, while the support surface 63 in the front area of the foot is inclined upwards from the inner edge 64 towards the outer edge 65.” ’561 patent, 5:7-14.
1[c] a toe section juxtaposed to the mid-foot section, wherein the mid-foot section and the toe section form an angled support platform that has a first slope along the inner edge of the apparatus from a front edge of the apparatus to the heel platform section, a second slope along the front edge of the apparatus from the inner edge to the outer edge of the apparatus, and a third slope along the outer edge of the apparatus from the front edge of the apparatus to the heel platform section, the first slope, second slope, and the third slope each greater than the reference slope, wherein the toe section is lower than the heel platform section as a result of the first, second, and third slopes.	The ’561 patent discloses a toe section juxtaposed to the mid-foot section, wherein the mid-foot section and the toe section form an angled support platform that has a first slope along the inner edge of the apparatus from a front edge of the apparatus to the heel platform section, a second slope along the front edge of the apparatus from the inner edge to the outer edge of the apparatus, and a third slope along the outer edge of the apparatus from the front edge of the apparatus to the heel platform section, the first slope, second slope, and the third slope each greater than the reference slope, wherein the toe section is lower than the heel platform section as a result of the first, second, and third slopes.

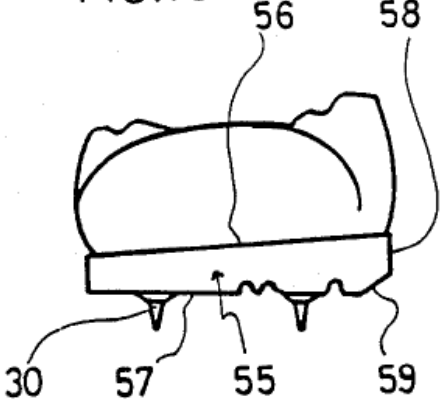
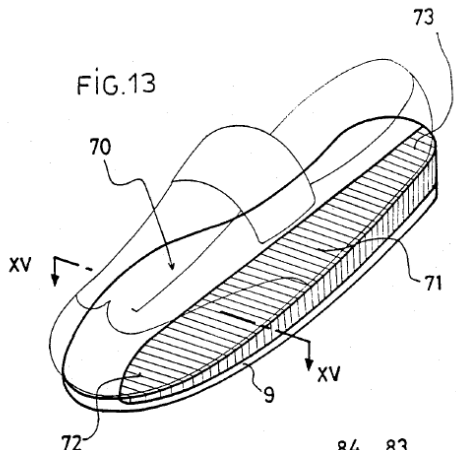
U.S. Patent No. 10,674,786	U.S. Patent No. 4,754,561
	“As assembled in FIG. 10, the sole 55 transversely has a plantar support surface 56 for the foot, providing the latter with a seating inclined with respect to the walking surface 57, as described above in reference to FIG. 9; conversely, in order to facilitate the rolling of the foot on the left outer edge 58 of the sole 55, an inclined plane 59, secant to the walking surface 57, is made on the lower side of said edge 58.” ’561 patent, 4:67-5:6.  “Provision is also made (FIGS. 11 and 12) for the sole 60 to furnish a transverse seating for the foot, having variations in the plantar support surface. As such, the plantar support zone 61 at the level of the heel remains substantially parallel to the walking surface 62, while the support surface 63 in the front area of the foot is inclined upwards from the inner edge 64 towards the outer edge 65.” ’561 patent, 5:7-14. FIG. 12 
2. The apparatus of claim 1 further comprises:	The ’561 patent discloses the heel platform section, the mid-foot section, and the toe section constituting at least one of an insole for footwear; and a sole of footwear.

U.S. Patent No. 10,674,786	U.S. Patent No. 4,754,561
the heel platform section, the mid-foot section, and the toe section constituting at least one of an insole for footwear; and a sole of footwear.	“Provision is also made (FIGS. 11 and 12) for the sole 60 to furnish a transverse seating for the foot, having variations in the plantar support surface. As such, the plantar support zone 61 at the level of the heel remains substantially parallel to the walking surface 62, while the support surface 63 in the front area of the foot is inclined upwards from the inner edge 64 towards the outer edge 65.” ’561 patent, 5:7-14. “According to another embodiment, illustrated in FIG. 13, the sole 70 is provided with a shock absorbing element 71 which extends substantially from the front part 72 occupied by the 3rd, 4th and 5th phalanges of the foot up to the heel zone 73; this element 71 has a variable thickness so that the front part 72 is thinner than the part at the heel 73. In this example, the thick ness of the sole 70, seen in elevation in its longitudinal direction, also increases as it goes towards the heel Zone 73.” ’561 patent, 5:15-24.

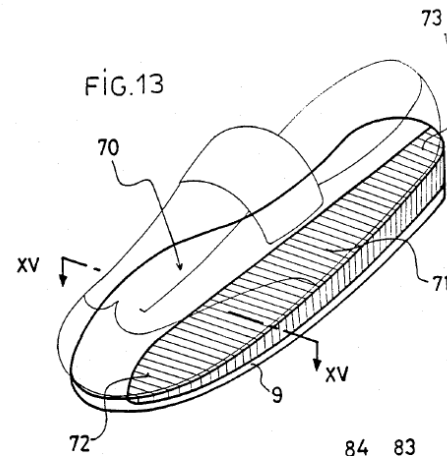
U.S. Patent No. 10,674,786	U.S. Patent No. 4,754,561
	FIG.9  “Still according to the invention (FIG. 9), the sole 45 has a transverse section in which the inside support surface 46 is inclined with respect to the walking surface 47. Considering that this involves the sole 45 of a left shoe, the incline of the surface 46 rises from the right inner edge 48 of said sole to the outer edge 49 thereof.” ’561 patent, 4:51-57. FIG.10 

U.S. Patent No. 10,674,786	U.S. Patent No. 4,754,561
section; at least a portion of the mid-foot section; and at least a portion of the toe section.	
5. A shoe comprises:	The '561 patent discloses a shoe.  “As assembled in FIG. 10, the sole 55 transversely has a plantar support surface 56 for the foot, providing the latter with a seating inclined with respect to the walking surface 57, as described above in reference to FIG. 9; conversely, in order to facilitate the rolling of the foot on the left outer edge 58 of the sole 55, an inclined plane 59, secant to the walking surface 57, is made on the lower side of said edge 58.” '561 patent, 4:67-5:6.

U.S. Patent No. 10,674,786	U.S. Patent No. 4,754,561
	 FIG. 13 70 73 71 72 9 84 83 xv xv “According to another embodiment, illustrated in FIG. 13, the sole 70 is provided with a shock absorbing element 71 which extends substantially from the front part 72 occupied by the 3rd, 4th and 5th phalanges of the foot up to the heel zone 73; this element 71 has a variable thickness so that the front part 72 is thinner than the part at the heel 73. In this example, the thickness of the sole 70, seen in elevation in its longitudinal direction, also increases as it goes towards the heel Zone 73.” ’561 patent, 5:15-24.
5[a] an upper shoe section; and	The ’561 patent discloses an upper shoe section.

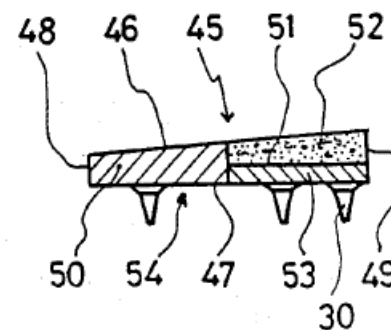
U.S. Patent No. 10,674,786	U.S. Patent No. 4,754,561
	FIG.10  “As assembled in FIG. 10, the sole 55 transversely has a plantar support surface 56 for the foot, providing the latter with a seating inclined with respect to the walking surface 57, as described above in reference to FIG. 9; conversely, in order to facilitate the rolling of the foot on the left outer edge 58 of the sole 55, an inclined plane 59, secant to the walking surface 57, is made on the lower side of said edge 58.” ’561 patent, 4:67-5:6. FIG.13 

U.S. Patent No. 10,674,786	U.S. Patent No. 4,754,561
	“According to another embodiment, illustrated in FIG. 13, the sole 70 is provided with a shock absorbing element 71 which extends substantially from the front part 72 occupied by the 3rd, 4th and 5th phalanges of the foot up to the heel zone 73; this element 71 has a variable thickness so that the front part 72 is thinner than the part at the heel 73. In this example, the thick ness of the sole 70, seen in elevation in its longitudinal direction, also increases as it goes towards the heel Zone 73.” ’561 patent, 5:15-24.
5[b] a sole coupled to the upper shoe section, wherein the sole includes:	The ’561 patent discloses a sole coupled to the upper shoe section. “Provision is also made (FIGS. 11 and 12) for the sole 60 to furnish a transverse seating for the foot, having variations in the plantar support surface. As such, the plantar support zone 61 at the level of the heel remains substantially parallel to the walking surface 62, while the support surface 63 in the front area of the foot is inclined upwards from the inner edge 64 towards the outer edge 65.” ’561 patent, 5:7-14.



“According to another embodiment, illustrated in FIG. 13, the sole 70 is provided with a shock absorbing element 71 which extends substantially from the front part 72 occupied by the 3rd, 4th and 5th phalanges of the foot up to the heel zone 73; this element 71 has a variable thickness so that the front part 72 is thinner than the part at the heel 73. In this example, the thickness of the sole 70, seen in elevation in its longitudinal direction, also increases as it goes towards the heel zone 73.” ’561 patent, 5:15-24.

FIG. 9

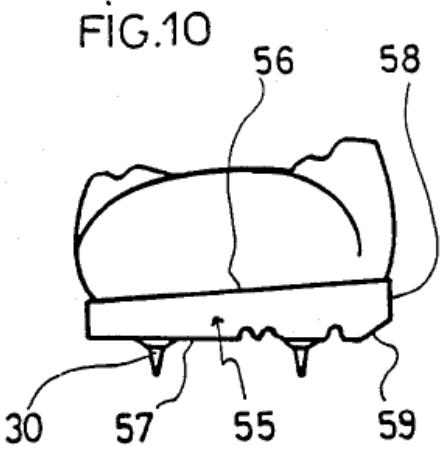


“Still according to the invention (FIG. 9), the sole 45 has a transverse section in which the inside support surface 46 is inclined with respect to the walking surface 47. Considering that this involves the sole 45 of a

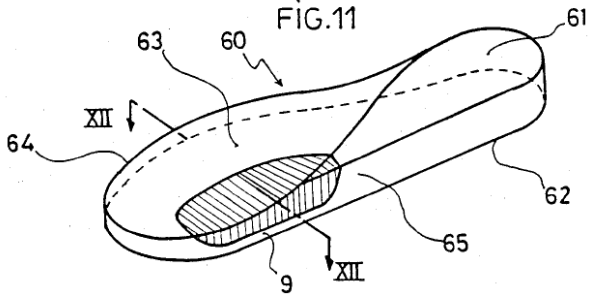
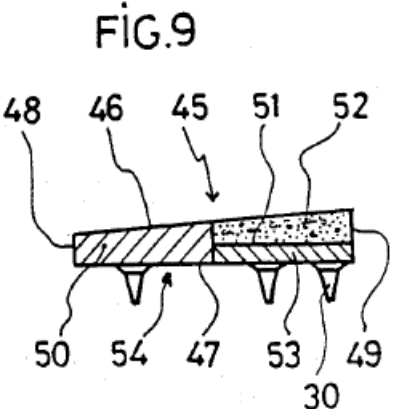
U.S. Patent No. 10,674,786	U.S. Patent No. 4,754,561
	left shoe, the incline of the surface 46 rises from the right inner edge 48 of said sole to the outer edge 49 thereof.” ’561 patent, 4:51-57. FIG.10 “As assembled in FIG. 10, the sole 55 transversely has a plantar support surface 56 for the foot, providing the latter with a seating inclined with respect to the walking surface 57, as described above in reference to FIG. 9; conversely, in order to facilitate the rolling of the foot on the left outer edge 58 of the sole 55, an inclined plane 59, secant to the walking surface 57, is made on the lower side of said edge 58.” ’561 patent, 4:67-5:6.
5[c] a specific bottom; and	The ’561 patent discloses a specific bottom.

U.S. Patent No. 10,674,786	U.S. Patent No. 4,754,561
	FIG.9 “Still according to the invention (FIG. 9), the sole 45 has a transverse section in which the inside support surface 46 is inclined with respect to the walking surface 47. Considering that this involves the sole 45 of a left shoe, the incline of the surface 46 rises from the right inner edge 48 of said sole to the outer edge 49 thereof.” ’561 patent, 4:51-57. FIG.10 “As assembled in FIG. 10, the sole 55 transversely has a plantar support surface 56 for the foot, providing the latter with a seating inclined with respect to the walking surface 57, as described above in reference to

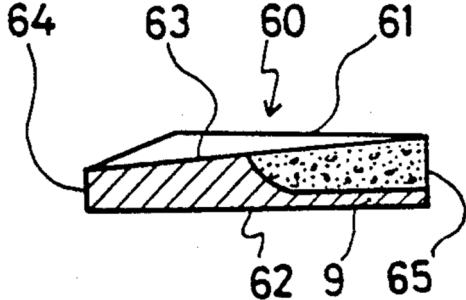
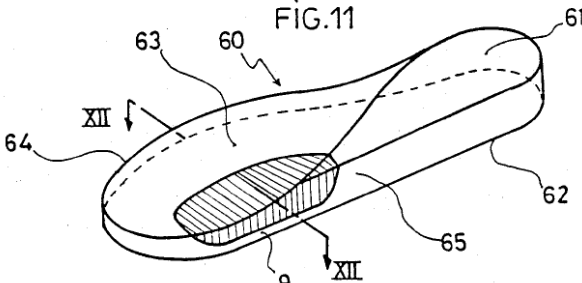
U.S. Patent No. 10,674,786	U.S. Patent No. 4,754,561
	FIG. 9; conversely, in order to facilitate the rolling of the foot on the left outer edge 58 of the sole 55, an inclined plane 59, secant to the walking surface 57, is made on the lower side of said edge 58.” ’561 patent, 4:67-5:6. Claim 18. Golf shoe according to claim 1 or 2, wherein the walking surface (11,23, 31', 36,53,57) of the sole (2, 20, 31, 39, 45, 55) is provided with a certain number of spikes (10, 24, 30).
5[d] an athletic positioning sole section having:	The ’561 patent discloses an athletic positioning sole. “Provision is also made (FIGS. 11 and 12) for the sole 60 to furnish a transverse seating for the foot, having variations in the plantar support surface. As such, the plantar support zone 61 at the level of the heel remains substantially parallel to the walking surface 62, while the support surface 63 in the front area of the foot is inclined upwards from the inner edge 64 towards the outer edge 65.” ’561 patent, 5:7-14.

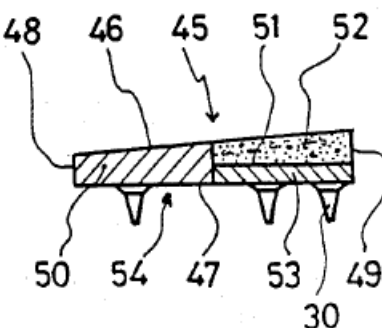
U.S. Patent No. 10,674,786	U.S. Patent No. 4,754,561
	left shoe, the incline of the surface 46 rises from the right inner edge 48 of said sole to the outer edge 49 thereof.” ’561 patent, 4:51-57. FIG.10  “As assembled in FIG. 10, the sole 55 transversely has a plantar support surface 56 for the foot, providing the latter with a seating inclined with respect to the walking surface 57, as described above in reference to FIG. 9; conversely, in order to facilitate the rolling of the foot on the left outer edge 58 of the sole 55, an inclined plane 59, secant to the walking surface 57, is made on the lower side of said edge 58.” ’561 patent, 4:67-5:6.
5[e] a heel platform section that has a uniform height from an outer edge to an inner edge of the athletic positioning sole section at a rear edge of the athletic positioning sole section, wherein the uniform height establishes a reference slope from the outer edge to the inner edge, the	The ’561 patent discloses a heel platform section that has a uniform height from an outer edge to an inner edge of the athletic positioning sole section at a rear edge of the athletic positioning sole section, wherein the uniform height establishes a reference slope from the outer edge to the inner edge, the reference slope substantially parallel to a bottom surface of the sole.

U.S. Patent No. 10,674,786	U.S. Patent No. 4,754,561
reference slope substantially parallel to a bottom surface of the sole;	“Provision is also made (FIGS. 11 and 12) for the sole 60 to furnish a transverse seating for the foot, having variations in the plantar support surface. As such, the plantar support zone 61 at the level of the heel remains substantially parallel to the walking surface 62, while the support surface 63 in the front area of the foot is inclined upwards from the inner edge 64 towards the outer edge 65.” ’561 patent, 5:7-14. “According to another embodiment, illustrated in FIG. 13, the sole 70 is provided with a shock absorbing element 71 which extends substantially from the front part 72 occupied by the 3rd, 4th and 5th phalanges of the foot up to the heel zone 73; this element 71 has a variable thickness so that the front part 72 is thinner than the part at the heel 73. In this example, the thick ness of the sole 70, seen in elevation in its longitudinal direction, also increases as it goes towards the heel Zone 73.” ’561 patent, 5:15-24.
5[f] a mid-foot section; and	The ’561 patent discloses a mid-foot section.

U.S. Patent No. 10,674,786	U.S. Patent No. 4,754,561
	 “Provision is also made (FIGS. 11 and 12) for the sole 60 to furnish a transverse seating for the foot, having variations in the plantar support surface. As such, the plantar support zone 61 at the level of the heel remains substantially parallel to the walking surface 62, while the support surface 63 in the front area of the foot is inclined upwards from the inner edge 64 towards the outer edge 65.” ’561 patent, 5:7-14.
5[g] a toe section, wherein the mid-foot section and the toe section form an angled support platform that has a first slope along the inner edge of the athletic positioning sole section from a front edge of the athletic positioning sole section to the heel platform section, a second slope along the front edge of the athletic positioning sole section from the inner edge to the outer edge of the athletic positioning sole section, and a third slope along the outer edge of the athletic positioning sole section from the front edge of the athletic positioning sole section to the heel platform section, the first slope, second slope, and the third slope each greater than the reference slope.	The ’561 patent discloses a toe section, wherein the mid-foot section and the toe section form an angled support platform that has a first slope along the inner edge of the athletic positioning sole section from a front edge of the athletic positioning sole section to the heel platform section, a second slope along the front edge of the athletic positioning sole section from the inner edge to the outer edge of the athletic positioning sole section, and a third slope along the outer edge of the athletic positioning sole section from the front edge of the athletic positioning sole section to the heel platform section, the first slope, second slope, and the third slope each greater than the reference slope. 

U.S. Patent No. 10,674,786	U.S. Patent No. 4,754,561
section from the front edge of the athletic positioning sole section to the heel platform section, the first slope, second slope, and the third slope each greater than the reference slope.	“Still according to the invention (FIG. 9), the sole 45 has a transverse section in which the inside support surface 46 is inclined with respect to the walking surface 47. Considering that this involves the sole 45 of a left shoe, the incline of the surface 46 rises from the right inner edge 48 of said sole to the outer edge 49 thereof.” ’561 patent, 4:51-57. “As assembled in FIG. 10, the sole 55 transversely has a plantar support surface 56 for the foot, providing the latter with a seating inclined with respect to the walking surface 57, as described above in reference to FIG. 9; conversely, in order to facilitate the rolling of the foot on the left outer edge 58 of the sole 55, an inclined plane 59, secant to the walking surface 57, is made on the lower side of said edge 58.” ’561 patent, 4:67-5:6.

U.S. Patent No. 10,674,786	U.S. Patent No. 4,754,561
	“Provision is also made (FIGS. 11 and 12) for the sole 60 to furnish a transverse seating for the foot, having variations in the plantar support surface. As such, the plantar support zone 61 at the level of the heel remains substantially parallel to the walking surface 62, while the support surface 63 in the front area of the foot is inclined upwards from the inner edge 64 towards the outer edge 65.” ’561 patent, 5:7-14. FIG. 12 
6. The shoe of claim 5 further comprises: the heel platform section has a uniform platform height, wherein, from a front edge of the heel platform to the rear edge of the athletic positioning sole section, the uniform platform height has the reference slope; and the toe section having a second dimension at a front outer edge of the apparatus and a third dimension at a front inner edge of the apparatus.	The ’561 patent discloses the heel platform section has a uniform platform height, wherein, from a front edge of the heel platform to the rear edge of the athletic positioning sole section, the uniform platform height has the reference slope; and the toe section having a second dimension at a front outer edge of the apparatus and a third dimension at a front inner edge of the apparatus. FIG. 11  “Provision is also made (FIGS. 11 and 12) for the sole 60 to furnish a transverse seating for the foot, having variations in the plantar support surface. As such, the plantar support zone 61 at the level of the heel remains

U.S. Patent No. 10,674,786	U.S. Patent No. 4,754,561
	substantially parallel to the walking surface 62, while the support surface 63 in the front area of the foot is inclined upwards from the inner edge 64 towards the outer edge 65.” ’561 patent, 5:7-14.
7. The shoe of claim 5 further comprises: an insole on a first surface of the apparatus covering one or more of: at least a portion of the heel platform section; at least a portion of the mid-foot section; and at least a portion of the toe section.	To the extent that the ‘561 patent does not expressly or inherently disclose an insole on a first surface of the apparatus covering one or more of: at least a portion of the heel platform section; at least a portion of the mid-foot section; and at least a portion of the toe section, it would have been obvious to a person of ordinary skill in the art at the time of the alleged invention of the ’786 patent in light of the knowledge, experience, training, and skill of a person of ordinary skill in the art at the time of the alleged invention. In addition, it would have been obvious in light of this reference in combination with the references cited for this limitation in the ‘786 Patent Obviousness Chart (Exhibit T), for the reasons discussed in that chart.
8. The shoe of claim 5, wherein the specific bottom comprises one of: a cleat pattern bottom; a baseball spike bottom; a basketball bottom; a tennis bottom; a golf bottom; an ice skate bottom; a ski boot bottom; a cross-trainer bottom; a running shoe bottom; a walking shoe bottom; a dress shoe bottom; and a snowboard boot bottom.	The ’561 patent discloses a specific bottom that comprises one of: a cleat pattern bottom, a baseball spike bottom, a basketball bottom, a tennis bottom, a golf bottom, an ice skate bottom, a ski boot bottom, a cross-trainer bottom, a running shoe bottom, a walking shoe bottom, a dress shoe bottom, and a snowboard boot bottom. FIG.9 

U.S. Patent No. 10,674,786	U.S. Patent No. 4,754,561
	“Still according to the invention (FIG. 9), the sole 45 has a transverse section in which the inside support surface 46 is inclined with respect to the walking surface 47. Considering that this involves the sole 45 of a left shoe, the incline of the surface 46 rises from the right inner edge 48 of said sole to the outer edge 49 thereof.” ’561 patent, 4:51-57. “As assembled in FIG. 10, the sole 55 transversely has a plantar support surface 56 for the foot, providing the latter with a seating inclined with respect to the walking surface 57, as described above in reference to FIG. 9; conversely, in order to facilitate the rolling of the foot on the left outer edge 58 of the sole 55, an inclined plane 59, secant to the walking surface 57, is made on the lower side of said edge 58.” ’561 patent, 4:67-5:6. Claim 18. Golf shoe according to claim 1 or 2, wherein the walking surface (11,23, 31', 36,53,57) of the sole (2, 20, 31, 39, 45, 55) is provided with a certain number of spikes (10, 24, 30).