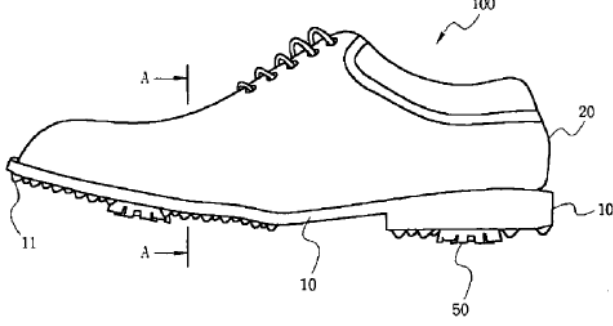
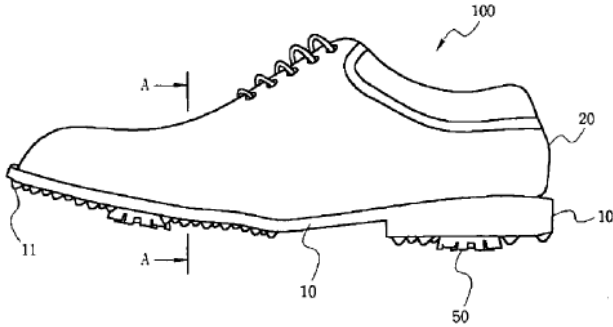


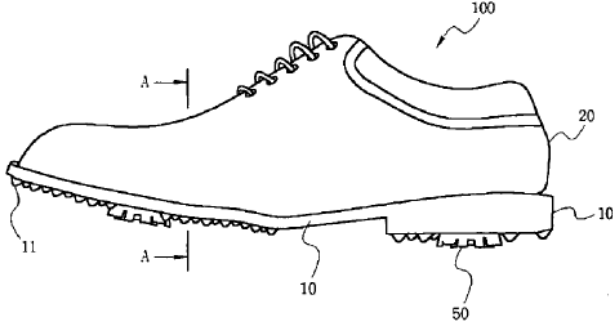
EXHIBIT A – U.S. Patent No. 11,013,291 in View of U.S. Patent Pub. No. 2004/0040181

US Patent Pub. No. 2004/0040181 (the “’181 publication”) published on March 4, 2004. It therefore constitutes prior art under at least pre-AIA 35 U.S.C. § 102(b). As shown below, the ’181 publication anticipates and/or renders obvious claims 1-5 of US Patent No. 11,013,291. To the extent Athalonz contends the ’181 publication does not anticipate a particular claim, the ’181 publication also renders the claim obvious for the reasons discussed in the ’291 Patent Obviousness Chart (Exhibit R).

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.

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1 [pre]. A shoe comprises:	The ’181 publication discloses a shoe. FIG. 1 

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	“Disclosed is a pair of golf shoes, each comprising an outsole provided with a plurality of spikes protruded from a lower surface of the outsole, in which the lower surface of the outsole is inclined from an outer edge of the outsole to an inner edge of the outsole so that the spikes at the inner edge of the outsole have a height larger than that of the spikes at the outer edge of the outsole, and the spikes respectively have heights so that an upper surface of the outsole is substantially parallel with a ground. The golf shoes allow golfer's feet to be stably mounted on the surface of a green, thereby assisting a golfer in taking a stable position during address and swing motions. thereby assisting a golfer in taking a stable position during address and Swing motions.” ’181 publication, Abstract.
[1a] an upper section;	The ’181 publication discloses an upper section. FIG. 1  “As shown in FIGS. 1 and 2, the golf shoe 100 in accordance with one embodiment of the present invention comprises an upper leather portion 20 and an outsole 10. The outsole 10 includes a lower surface 12 inclined from its outer edge 60 to its inner edge 30 so that the outer edge 60 has a thickness larger than that of the inner edge 30. Except for the outsole 10 including the inclined lower surface 12, the golf shoe 100 of the present invention is substantially the same as conventional golf shoes.” ’181 publication, [0027]. “That is, the golf shoe 100 of the present invention comprises the upper leather portion 20 for accommodating a golfer's foot, and the outsole 10 attached to the lower surface of the upper leather portion 20 and adapted to contact the ground. Further, the golf shoe 100 further comprises an insole (not shown) arranged on the bottom of the inside of the upper leather portion 20.” ’181 publication, [0028].

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[1b] a midsole coupled to the upper section;	The '181 publication discloses a midsole coupled to the upper section. FIG. 1  “Generally, the outsole 10 includes an intermediate sole and an outer sole. Here, the outsole 10 denotes the intermediate sole and the outer sole.” '181 publication, [0029].
[1c] an insole positioned proximal to the midsole and within the upper section; and	The '181 publication discloses an insole positioned proximal to the midsole and within the upper section. “That is, the golf shoe 100 of the present invention comprises the upper leather portion 20 for accommodating a golfer's foot, and the outsole 10 attached to the lower surface of the upper leather portion 20 and adapted to contact the ground. Further, the golf shoe 100 further comprises an insole (not shown) arranged on the bottom of the inside of the upper leather portion 20.” '181 publication, [0028].
[1d] a bottom outsole coupled to the midsole, wherein a combination of the midsole, the insole, and the bottom outsole form an athletic positioning shape, wherein the athletic positioning shape has: a first height at an inside edge and at an outside edge of the shoe along a heel section of the shoe, a second height on the outside edge of the shoe at a toe section of the shoe, a third height on the inside edge of the shoe at the toe section of the shoe, and the first height being greater than the second height and the second height being greater than the third height, wherein a first slope is formed by the first height and the second height, wherein a second sloped is formed by the first height and the third height, and wherein a third slope is formed by the second height and the third height.	The '181 publication discloses a bottom outsole coupled to the midsole, wherein a combination of the midsole, the insole, and the bottom outsole form an athletic positioning shape, wherein the athletic positioning shape has a first height at an inside edge and at an outside edge of the shoe along a heel section of the shoe, a second height on the outside edge of the shoe at a toe section of the shoe, a third height on the inside edge of the shoe at the toe section of the shoe, and the first height being greater than the second height and the second height being greater than the third height, wherein a first slope is formed by the first height and the second height, wherein a second sloped is formed by the first height and the third height, and wherein a third slope is formed by the second height and the third height. “Therefore, the present invention has been made in view of the above problems, and it is an object of the present invention to provide a pair of golf shoes, which assist a golfer in concentrating his/her proper

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the outside edge of the shoe at a toe section of the shoe, a third height on the inside edge of the shoe at the toe section of the shoe, and the first height being greater than the second height and the second height being greater than the third height, wherein a first slope is formed by the first height and the second height, wherein a second sloped is formed by the first height and the third height, and wherein a third slope is formed by the second height and the third height.	weight balance on the inner edges of soles of feet during the address and swing motions, thus allowing the golfer to perform the swing motion while maintaining his/her stable position.” ’181 publication, [0012]. “It is another object of the present invention to provide a pair of golf shoes, which allow a golfer to stably maintain the lower part of his/her body on the surface of a green during the address and swing motions, thus assisting the golfer in swinging a club along a correct path and to correctly impact a golf ball by means of the swing of the club.” ’181 publication, [0013]. “In accordance with the present invention, the above and other objects can be accomplished by the provision of a pair of golf shoes, each comprising an outsole provided with a plurality of spikes protruded from a lower surface of the outsole, wherein: bottoms of the spikes (an upper surface of the outsole) are substantially parallel with the ground; the lower surface of the outsole is inclined so that the thickness of the lower surface of the outsole is decreased from its outer edge to its inner edge; and spikes at the inner edge of the outsole have a height larger than that of the spikes at the outer edge of the outsole.” ’181 publication, [0014]. “That is, the lower surface of the outsole is inclined so that the thickness of the lower surface of the outsole is decreased from the outer edge to the inner edge, the spikes protruded from the lower surface of the outsole have different heights at outer and inner edges of the outsole (the height of spikes at the inner edge is larger than the height of the spikes at the outer edge), and the bottoms of the spikes are substantially parallel with the ground, thereby allowing a golfer in the golf shoes to concentrating his/her weight during the address and swing phases on the inner edges of soles of feet and assisting the golfer in performing a stable swing motion.” ’181 publication, [0015]. “Preferably, the lower surface of the outsole may be stepped upward from the outer edge to the inner edge.” ’181 publication, [0016].

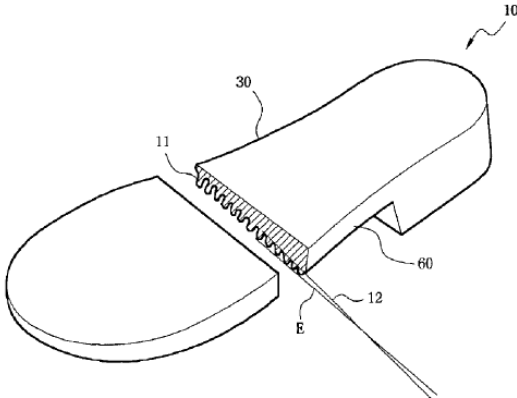
U.S. Patent No. 11,013,291	U.S. Patent Pub. No. 2004/0040181
	FIG. 2  “As shown in FIGS. 1 and 2, the golf shoe 100 in accordance with one embodiment of the present invention comprises an upper leather portion 20 and an outsole 10. The outsole 10 includes a lower surface 12 inclined from its outer edge 60 to its inner edge 30 so that the outer edge 60 has a thickness larger than that of the inner edge 30. Except for the outsole 10 including the inclined lower surface 12, the golf shoe 100 of the present invention is substantially the same as conventional golf shoes.” ’181 publication, [0027]. “Here, the lower surface 12 of the outsole 10 is inclined from the outer edge 60 to the inner edge 30. That is, the outsole 10 at the outer edge 60 has a thickness larger than that of the outsole 10 at the inner edge 30.” ’181 publication, [0032].

FIG. 3a

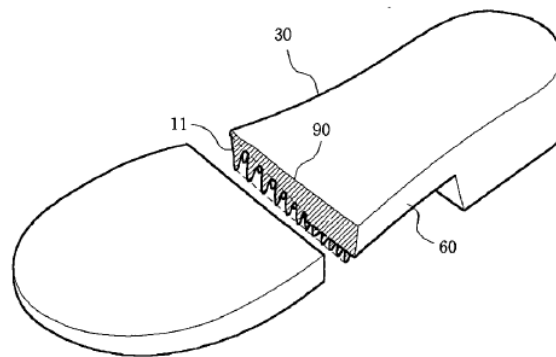
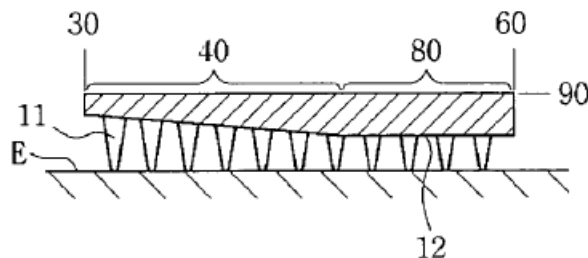
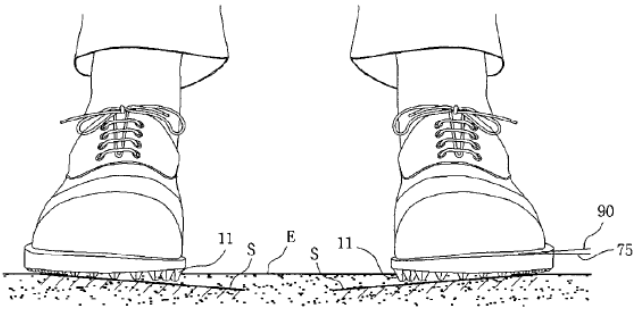


FIG. 3b



“FIGS. 3a and 3b illustrate an outsole of a golf shoe in accordance with another embodiment of the present invention. In this embodiment, the height of the spikes 11 at the inner edge 30 of the outsole 10 is larger than that of the spikes 11 at the outer edge 60 of the outsole 10. However, the lower surface 12 of the outsole 10 is not gradually inclined from the outer edge 60 to the inner edge 30, but includes a horizontal plane 80 extended from the outer edge 60, and an inclined plane 40 extended from the end of the horizontal plane 80.” ’181 publication, [0041].

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	FIG. 5b  “FIG. 5<i>b</i> is a schematic view illustrating feet of a golfer in a pair of the golf shoes 100 of the present invention standing on the ground E of a green. When the golfer in a pair of the golf shoes 100 of the present invention stands on the ground E of the green, since the height of the spikes 11 at the inner edge 30 of the outsole 10 is larger than that of the spikes 11 at the outer edge 60 of the outsole 10, the spikes 11 at the inner edge 30 penetrate the ground E of the green more deeply than the spikes 11 at the outer edge 60, and has a holding power stronger than the holding power of the spikes 11 at the outer edge 60. Thereby, both legs of the golfer in the stance position are close to each other toward the inner edges of the soles of the feet, thus allowing the weight balance of the golfer's body to be concentrated on the inner edges of the soles of the feet.” ’181 publication, [0036]. “In FIGS. 5<i>a</i> and 5<i>b</i>, the reference numeral 90 denotes a line representing the level of the golfer's feet being parallel with the ground E, and the reference numeral 75 denotes a line being parallel with a line (S) representing the level of the bottoms of the spikes 11.” ’181 publication, [0039].
2. The shoe of claim 1 further comprises: the athletic positioning shape including the heel section, a mid-foot section, and a toe section, wherein the mid-foot section is between the heel section and the toe section,	The ’181 publication discloses the athletic positioning shape including the heel section, a mid-foot section, and a toe section, wherein the mid-foot section is between the heel section and the toe section, and wherein the heel section has the first height throughout.

and wherein the heel section has the first height throughout.

FIG. 1

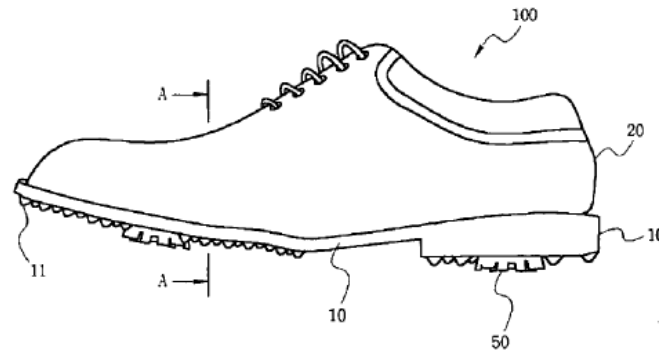
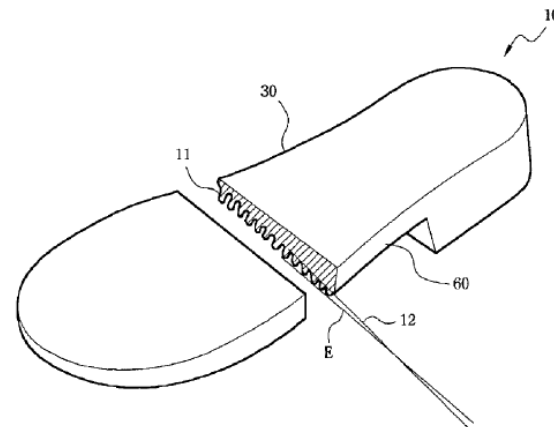


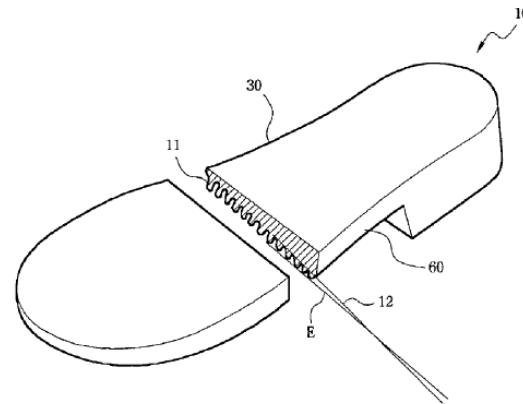
FIG. 2



“As shown in FIGS. 1 and 2, the golf shoe 100 in accordance with one embodiment of the present invention comprises an upper leather portion 20 and an outsole 10. The outsole 10 includes a lower surface 12 inclined from its outer edge 60 to its inner edge 30 so that the outer edge 60 has a thickness larger than that of the inner edge 30. Except for the outsole 10 including the inclined lower surface 12,

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	the golf shoe 100 of the present invention is substantially the same as conventional golf shoes.” ’181 publication, [0027]. “Although the preferred embodiments of the present invention have been disclosed for illustrative purposes, those skilled in the art will appreciate that various modifications, additions and substitutions are possible, without departing from the scope and spirit of the invention as disclosed in the accompanying claims. For example, the inclined plane may be formed only at the front portion of the outsole, or only at parts of the front and/or rear portions of the outsole.” ’181 publication, [0046].
3. The shoe of claim 2 further comprises: a fourth height at the outside edge of the shoe at a transition from the mid-foot section to the toe section, wherein the fourth height is greater than the second height and wherein the fourth height is less than the first height.	The ’181 publication discloses a fourth height at the outside edge of the shoe at a transition from the mid-foot section to the toe section, wherein the fourth height is greater than the second height and wherein the fourth height is less than the first height. “That is, the lower surface of the outsole is inclined so that the thickness of the lower surface of the outsole is decreased from the outer edge to the inner edge, the spikes protruded from the lower surface of the outsole have different heights at outer and inner edges of the outsole (the height of spikes at the inner edge is larger than the height of the spikes at the outer edge), and the bottoms of the spikes are substantially parallel with the ground, thereby allowing a golfer in the golf shoes to concentrating his/her weight during the address and swing phases on the inner edges of soles of feet and assisting the golfer in performing a stable swing motion.” ’181 publication, [0015]. “Preferably, the lower surface of the outsole may be stepped upward from the outer edge to the inner edge.” ’181 publication, [0016].

FIG. 2



“As shown in FIGS. 1 and 2, the golf shoe 100 in accordance with one embodiment of the present invention comprises an upper leather portion 20 and an outsole 10. The outsole 10 includes a lower surface 12 inclined from its outer edge 60 to its inner edge 30 so that the outer edge 60 has a thickness larger than that of the inner edge 30. Except for the outsole 10 including the inclined lower surface 12, the golf shoe 100 of the present invention is substantially the same as conventional golf shoes.” ’181 publication, [0027].

“Here, the lower surface 12 of the outsole 10 is inclined from the outer edge 60 to the inner edge 30. That is, the outsole 10 at the outer edge 60 has a thickness larger than that of the outsole 10 at the inner edge 30.” ’181 publication, [0032].

FIG. 3a

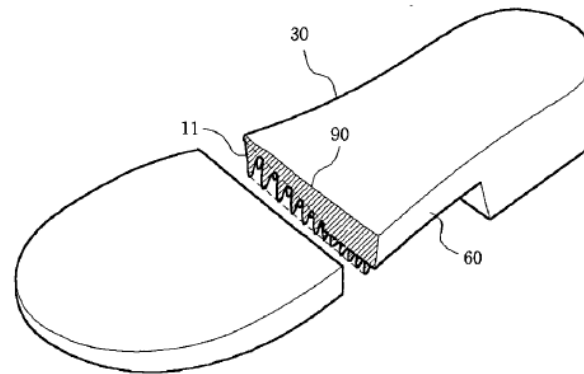
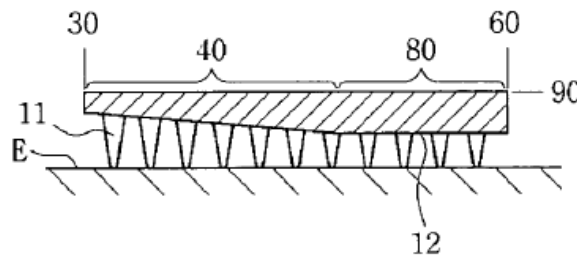
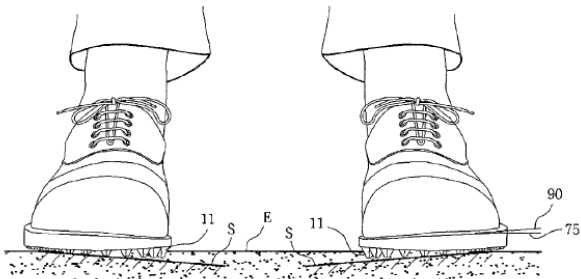


FIG. 3b



“FIGS. 3a and 3b illustrate an outsole of a golf shoe in accordance with another embodiment of the present invention. In this embodiment, the height of the spikes 11 at the inner edge 30 of the outsole 10 is larger than that of the spikes 11 at the outer edge 60 of the outsole 10. However, the lower surface 12 of the outsole 10 is not gradually inclined from the outer edge 60 to the inner edge 30, but includes a horizontal plane 80 extended from the outer edge 60, and an inclined plane 40 extended from the end of the horizontal plane 80.” ’181 publication, [0041].

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	FIG. 5b  “FIG. 5b is a schematic view illustrating feet of a golfer in a pair of the golf shoes 100 of the present invention standing on the ground E of a green. When the golfer in a pair of the golf shoes 100 of the present invention stands on the ground E of the green, since the height of the spikes 11 at the inner edge 30 of the outsole 10 is larger than that of the spikes 11 at the outer edge 60 of the outsole 10, the spikes 11 at the inner edge 30 penetrate the ground E of the green more deeply than the spikes 11 at the outer edge 60, and has a holding power stronger than the holding power of the spikes 11 at the outer edge 60. Thereby, both legs of the golfer in the stance position are close to each other toward the inner edges of the soles of the feet, thus allowing the weight balance of the golfer's body to be concentrated on the inner edges of the soles of the feet.” ’181 publication, [0036]. “In FIGS. 5a and 5b, the reference numeral 90 denotes a line representing the level of the golfer's feet being parallel with the ground E, and the reference numeral 75 denotes a line being parallel with a line (S) representing the level of the bottoms of the spikes 11.” ’181 publication, [0039].
4. The shoe of claim 3 further comprises: a fifth height at the inside edge of the shoe at the transition from the mid-foot section to the toe section, wherein the fifth height is greater than the third height and wherein the fifth height is	The ’181 publication discloses a fifth height at the inside edge of the shoe at the transition from the mid-foot section to the toe section, wherein the fifth height is greater than the third height and wherein the fifth height is less than the first height and less than the fourth height. “That is, the lower surface of the outsole is inclined so that the thickness of the lower surface of the outsole is decreased from the outer edge to the inner edge, the spikes protruded from the lower surface of the outsole have different heights at outer and inner edges of the outsole (the height of spikes at the inner edge is larger than the height of the spikes at the outer edge), and the bottoms of the spikes are substantially parallel with the ground, thereby allowing a golfer in the golf shoes to concentrating his/her

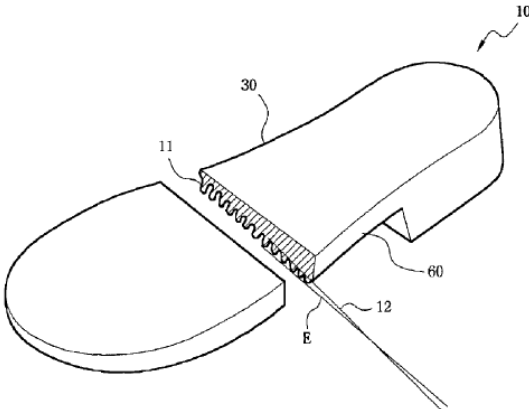
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less than the first height and less than the fourth height.	weight during the address and swing phases on the inner edges of soles of feet and assisting the golfer in performing a stable swing motion.” ’181 publication, [0015]. “Preferably, the lower surface of the outsole may be stepped upward from the outer edge to the inner edge.” ’181 publication, [0016]. FIG. 2  “As shown in FIGS. 1 and 2, the golf shoe 100 in accordance with one embodiment of the present invention comprises an upper leather portion 20 and an outsole 10. The outsole 10 includes a lower surface 12 inclined from its outer edge 60 to its inner edge 30 so that the outer edge 60 has a thickness larger than that of the inner edge 30. Except for the outsole 10 including the inclined lower surface 12, the golf shoe 100 of the present invention is substantially the same as conventional golf shoes.” ’181 publication, [0027]. “Here, the lower surface 12 of the outsole 10 is inclined from the outer edge 60 to the inner edge 30. That is, the outsole 10 at the outer edge 60 has a thickness larger than that of the outsole 10 at the inner edge 30.” ’181 publication, [0032].

FIG. 3a

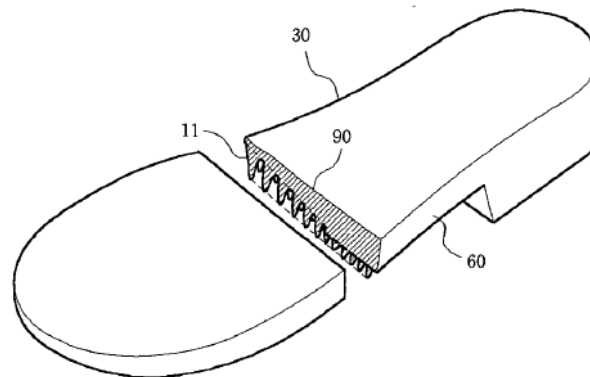
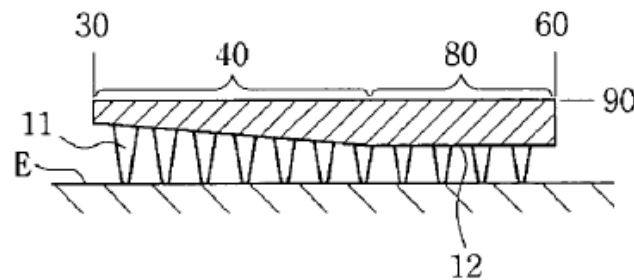
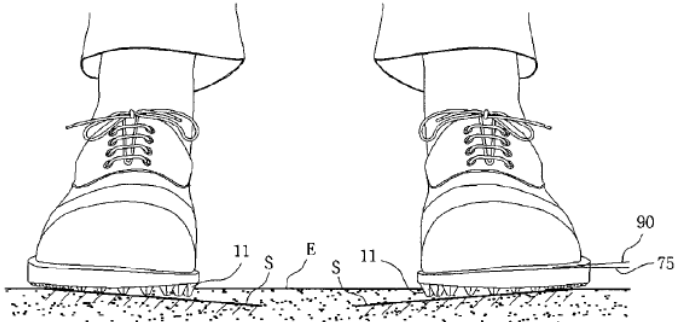


FIG. 3b



“FIGS. 3a and 3b illustrate an outsole of a golf shoe in accordance with another embodiment of the present invention. In this embodiment, the height of the spikes 11 at the inner edge 30 of the outsole 10 is larger than that of the spikes 11 at the outer edge 60 of the outsole 10. However, the lower surface 12 of the outsole 10 is not gradually inclined from the outer edge 60 to the inner edge 30, but includes a horizontal plane 80 extended from the outer edge 60, and an inclined plane 40 extended from the end of the horizontal plane 80.” ’181 publication, [0041].

U.S. Patent No. 11,013,291	U.S. Patent Pub. No. 2004/0040181
	FIG. 5b  “FIG. 5<i>b</i> is a schematic view illustrating feet of a golfer in a pair of the golf shoes 100 of the present invention standing on the ground E of a green. When the golfer in a pair of the golf shoes 100 of the present invention stands on the ground E of the green, since the height of the spikes 11 at the inner edge 30 of the outsole 10 is larger than that of the spikes 11 at the outer edge 60 of the outsole 10, the spikes 11 at the inner edge 30 penetrate the ground E of the green more deeply than the spikes 11 at the outer edge 60, and has a holding power stronger than the holding power of the spikes 11 at the outer edge 60. Thereby, both legs of the golfer in the stance position are close to each other toward the inner edges of the soles of the feet, thus allowing the weight balance of the golfer's body to be concentrated on the inner edges of the soles of the feet.” ’181 publication, [0036]. “In FIGS. 5<i>a</i> and 5<i>b</i>, the reference numeral 90 denotes a line representing the level of the golfer's feet being parallel with the ground E, and the reference numeral 75 denotes a line being parallel with a line (S) representing the level of the bottoms of the spikes 11.” ’181 publication, [0039].
5. The shoe of claim 2 further comprises: a fourth height at the inside edge of the shoe at the transition from the mid-foot section to the toe section, wherein the fourth height is greater than the third height	The ’181 publication discloses a fourth height at the inside edge of the shoe at the transition from the mid-foot section to the toe section, wherein the fourth height is greater than the third height and wherein the fourth height is less than the first height. “That is, the lower surface of the outsole is inclined so that the thickness of the lower surface of the outsole is decreased from the outer edge to the inner edge, the spikes protruded from the lower surface of the outsole have different heights at outer and inner edges of the outsole (the height of spikes at the inner edge is larger than the height of the spikes at the outer edge), and the bottoms of the spikes are substantially parallel with the ground, thereby allowing a golfer in the golf shoes to concentrating his/her

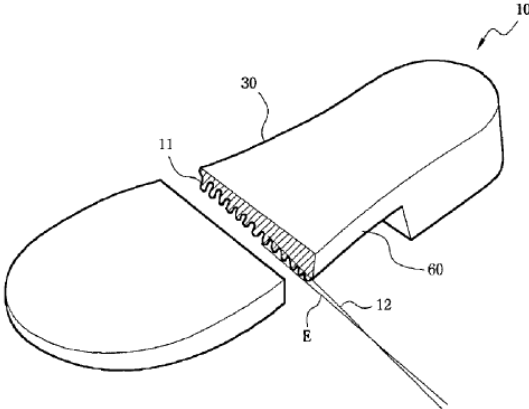
U.S. Patent No. 11,013,291	U.S. Patent Pub. No. 2004/0040181
and wherein the fourth height is less than the first height.	weight during the address and swing phases on the inner edges of soles of feet and assisting the golfer in performing a stable swing motion.” ’181 publication, [0015]. “Preferably, the lower surface of the outsole may be stepped upward from the outer edge to the inner edge.” ’181 publication, [0016]. FIG. 2  “As shown in FIGS. 1 and 2, the golf shoe 100 in accordance with one embodiment of the present invention comprises an upper leather portion 20 and an outsole 10. The outsole 10 includes a lower surface 12 inclined from its outer edge 60 to its inner edge 30 so that the outer edge 60 has a thickness larger than that of the inner edge 30. Except for the outsole 10 including the inclined lower surface 12, the golf shoe 100 of the present invention is substantially the same as conventional golf shoes.” ’181 publication, [0027]. “Here, the lower surface 12 of the outsole 10 is inclined from the outer edge 60 to the inner edge 30. That is, the outsole 10 at the outer edge 60 has a thickness larger than that of the outsole 10 at the inner edge 30.” ’181 publication, [0032].

FIG. 3a

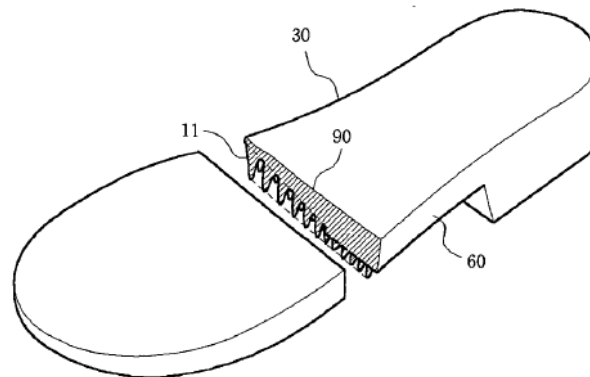
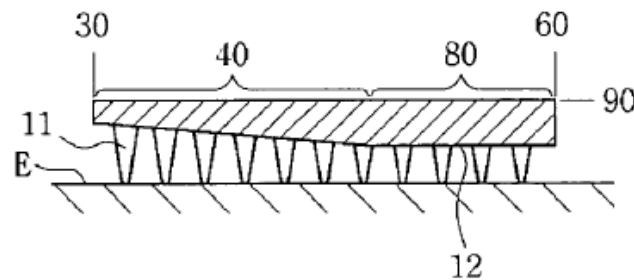
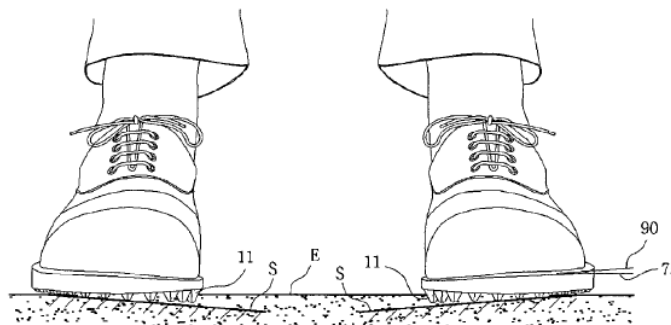


FIG. 3b



“FIGS. 3a and 3b illustrate an outsole of a golf shoe in accordance with another embodiment of the present invention. In this embodiment, the height of the spikes 11 at the inner edge 30 of the outsole 10 is larger than that of the spikes 11 at the outer edge 60 of the outsole 10. However, the lower surface 12 of the outsole 10 is not gradually inclined from the outer edge 60 to the inner edge 30, but includes a horizontal plane 80 extended from the outer edge 60, and an inclined plane 40 extended from the end of the horizontal plane 80.” ’181 publication, [0041].

FIG. 5b



“FIG. 5b is a schematic view illustrating feet of a golfer in a pair of the golf shoes 100 of the present invention standing on the ground E of a green. When the golfer in a pair of the golf shoes 100 of the present invention stands on the ground E of the green, since the height of the spikes 11 at the inner edge 30 of the outsole 10 is larger than that of the spikes 11 at the outer edge 60 of the outsole 10, the spikes 11 at the inner edge 30 penetrate the ground E of the green more deeply than the spikes 11 at the outer edge 60, and has a holding power stronger than the holding power of the spikes 11 at the outer edge 60. Thereby, both legs of the golfer in the stance position are close to each other toward the inner edges of the soles of the feet, thus allowing the weight balance of the golfer's body to be concentrated on the inner edges of the soles of the feet.” ’181 publication, [0036].

“In FIGS. 5a and 5b, the reference numeral 90 denotes a line representing the level of the golfer's feet being parallel with the ground E, and the reference numeral 75 denotes a line being parallel with a line (S) representing the level of the bottoms of the spikes 11.” ’181 publication, [0039].