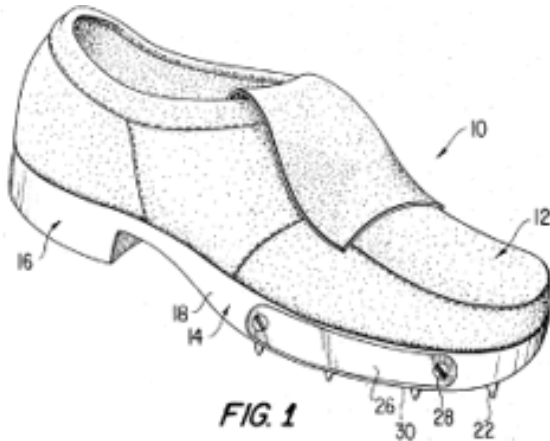
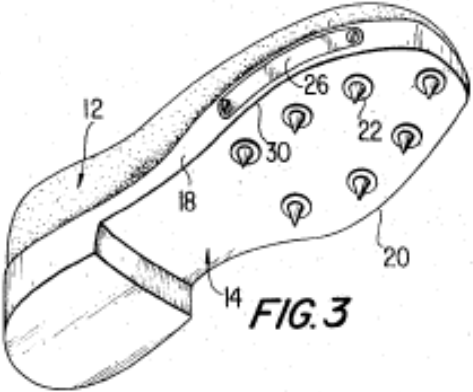
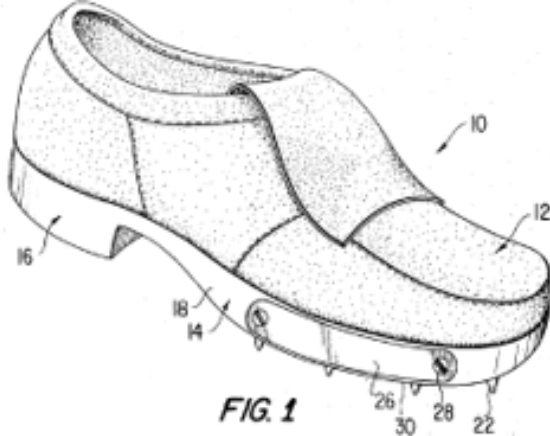


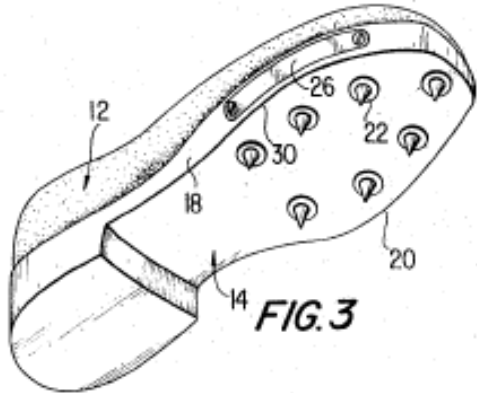
EXHIBIT B – U.S. Patent No. 11,013,291 in View of U.S. Patent 3,789,523

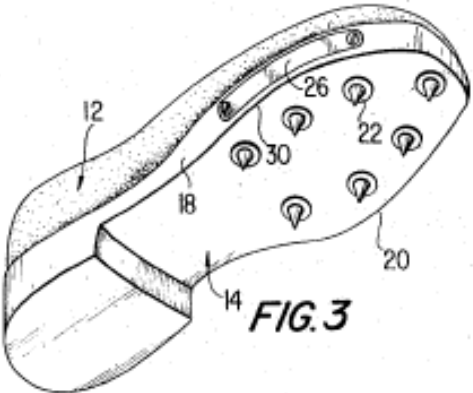
US No. 3,789,523 (the “’523 patent”) issued on July 5, 1988. It therefore constitutes prior art under at least pre-AIA 35 U.S.C. § 102(b). As shown below, the ’523 patent anticipates and/or renders obvious claims 1-5 of US Patent No. 11,013,291. To the extent Athalonz contends the ’523 patent does not anticipate a particular claim, the ’523 publication also renders the claim obvious for the reasons discussed in the ’291 Patent Obviousness Chart (Exhibit R).

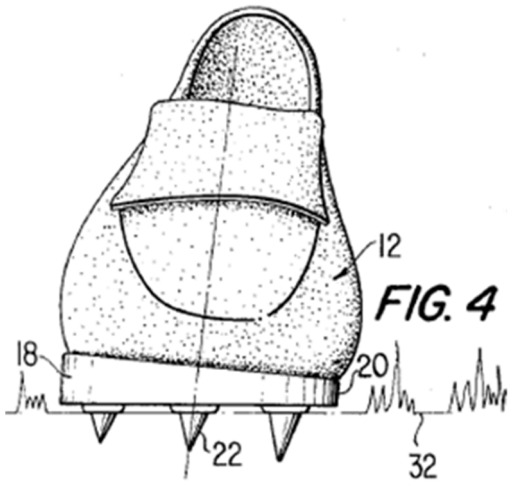
These invalidity contentions are based on Under Armour’s present understanding of the asserted claims and Athalonz’s apparent construction of the claims in its September 14, 2023 Disclosure of Asserted Claims and Infringement Contentions, which is deficient at least insofar as it fails to cite any documents 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.

U.S. Patent No. 11,013,291	U.S. Patent No. 3,789,523
1 [pre]. A shoe comprises:	The ’523 patent discloses a shoe.  FIG. 1

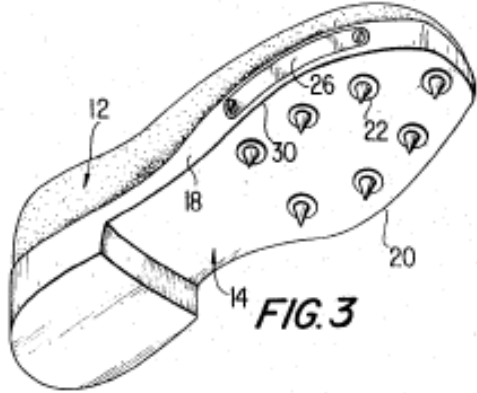
U.S. Patent No. 11,013,291	U.S. Patent No. 3,789,523
	 “Shoe 10 includes a conventional upper 12 and a sole 14 which can be molded integrally with upper 12 from such material as poly vinyl chloride. Sole 14 should be sufficiently flexible to enable the wearer latitude to flex the shoe when walking but yet rigid enough to preclude undue roll of the shoe when used by the golfer once he has assumed a proper stance over a golf ball. A conventional heel 6 is also molded integrally with sole 14.” ’523 patent, 2:60-68.
[1a] an upper section;	The ’523 patent discloses an upper section. 

U.S. Patent No. 11,013,291	U.S. Patent No. 3,789,523
	 “Shoe 10 includes a conventional upper 12 and a sole 14 which can be molded integrally with upper 12 from such material as poly vinyl chloride. Sole 14 should be sufficiently flexible to enable the wearer latitude to flex the shoe when walking but yet rigid enough to preclude undue roll of the shoe when used by the golfer once he has assumed a proper stance over a golf ball. A conventional heel 6 is also molded integrally with sole 14.” ’523 patent, 2:60-68.
[1b] a midsole coupled to the upper section;	To the extent that the ‘523 patent does not expressly or inherently disclose a midsole coupled to the upper section, it would have been obvious to a person of ordinary skill in the art at the time of the alleged invention of the ’291 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 ‘291 Patent Obviousness Chart (Exhibit R), for the reasons discussed in that chart.
[1c] an insole positioned proximal to the midsole and within the upper section; and	To the extent that the ‘523 patent does not expressly or inherently disclose an insole positioned proximal to the midsole and within the upper section, it would have been obvious to a person of ordinary skill in the art at the time of the alleged invention of the ’291 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 ‘291 Patent Obviousness Chart (Exhibit R), for the reasons discussed in that chart.
[1d] a bottom outsole coupled to the midsole, wherein a	The ’523 patent 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

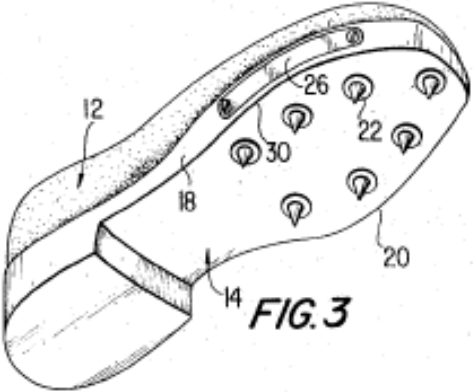
U.S. Patent No. 11,013,291	U.S. Patent No. 3,789,523
combination of the midsole, the insole, and the bottom outsole form an athletic positioning shape, wherein the athletic positioning shape has: a first height at an inside edge and at an outside edge of the shoe along a heel section of the shoe, a second 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.	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. 

U.S. Patent No. 11,013,291	U.S. Patent No. 3,789,523
	 “The outer side 18 of sole 4 extends downwardly from the shoe upper 12 to a lower elevation than the inner side 20 of sole 14. The sole portion 14 of shoe 10 will therefore have the appearance of having a built-up sole along outer side 18 so that the planar bottom of sole 14.” ’523 patent, 3:9-15. “FIGS. 2 and 4 illustrate the manner of use of the shoe 10. Specifically, in FIG. 4, the golfer will imbed cleats 22 in a golf playing surface 32 when addressing a golf ball. The rearwardmost foot of the golfer will be tilted inwardly because of the wedge-shaped sole 14 of shoe 10. This will tend to provide a more satisfactory weight distribution when hitting the ball. Furthermore, it has been found that a more desirable pivot will result when a golfer assumes the stance illustrated in FIG. 4.” ’523 patent, 3:56-65.
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	The ’523 patent 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.

U.S. Patent No. 11,013,291	U.S. Patent No. 3,789,523
section and the toe section, and wherein the heel section has the first height throughout.	FIG. 1 FIG. 3 “Shoe 10 includes a conventional upper 12 and a sole 14 which can be molded integrally with upper 12 from such material as poly vinyl chloride. Sole 14 should be sufficiently flexible to enable the wearer latitude to flex the shoe when walking but yet rigid enough to preclude undue roll of the shoe when used by the golfer once he has assumed a proper stance over a golf ball. A conventional heel 6 is also molded integrally with sole 14.” ’523 patent, 2:60-68.

U.S. Patent No. 11,013,291	U.S. Patent No. 3,789,523
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 '523 patent 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.  “Shoe 10 includes a conventional upper 12 and a sole 14 which can be molded integrally with upper 12 from such material as poly vinyl chloride. Sole 14 should be sufficiently flexible to enable the wearer latitude to flex the shoe when walking but yet rigid enough to preclude undue roll of the shoe when used by the golfer once he has assumed a proper stance over a golf ball. A conventional heel 6 is also molded integrally with sole 14.” '523 patent, 2:60-68.
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 '523 patent 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.

U.S. Patent No. 11,013,291	U.S. Patent No. 3,789,523
less than the first height and less than the fourth height.	“Shoe 10 includes a conventional upper 12 and a sole 14 which can be molded integrally with upper 12 from such material as poly vinyl chloride. Sole 14 should be sufficiently flexible to enable the wearer latitude to flex the shoe when walking but yet rigid enough to preclude undue roll of the shoe when used by the golfer once he has assumed a proper stance over a golf ball. A conventional heel 6 is also molded integrally with sole 14.” ’523 patent, 2:60-68.
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 and wherein the fourth height is less than the first height.	The ’523 patent 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.

U.S. Patent No. 11,013,291	U.S. Patent No. 3,789,523
	 “Shoe 10 includes a conventional upper 12 and a sole 14 which can be molded integrally with upper 12 from such material as poly vinyl chloride. Sole 14 should be sufficiently flexible to enable the wearer latitude to flex the shoe when walking but yet rigid enough to preclude undue roll of the shoe when used by the golfer once he has assumed a proper stance over a golf ball. A conventional heel 6 is also molded integrally with sole 14.” ’523 patent, 2:60-68.