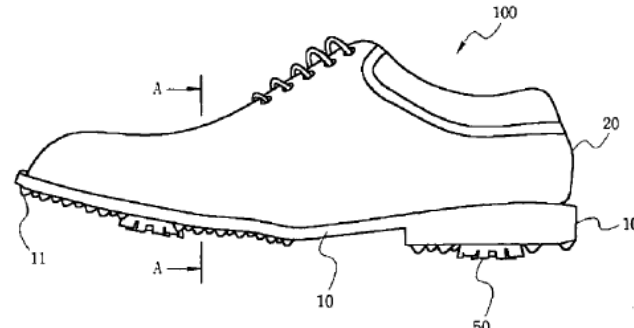
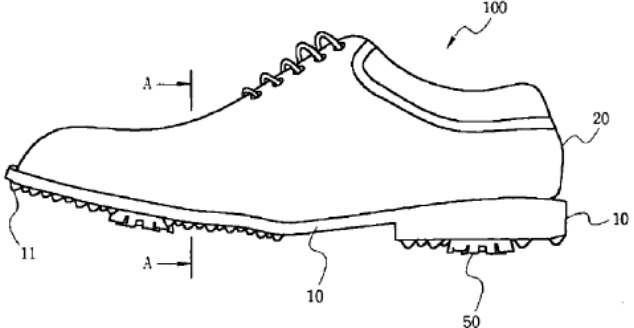


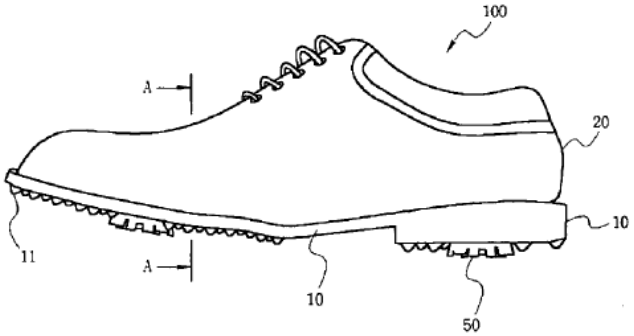
EXHIBIT D – U.S. Patent No. 11,064,760 in View of U.S. Patent Pub. No. 2004/0040181

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 1-11 of US Patent No. 11,064,760. 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 ’760 Patent Obviousness Chart (Exhibit S).

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.

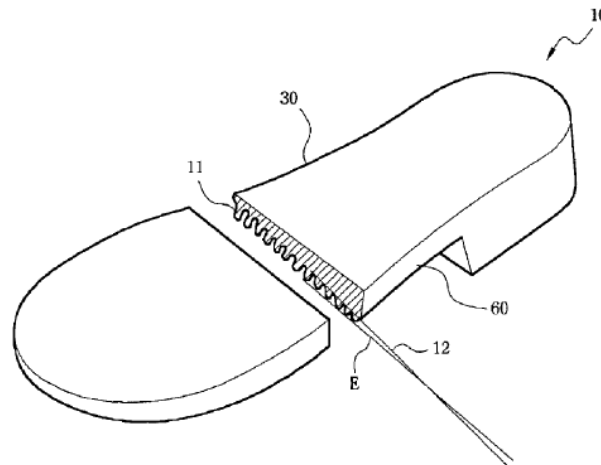
U.S. Patent No. 11,064,760	U.S. Patent Pub. No. 2004/0040181
1[pre]. A pair of shoes comprises:	The ’181 publication discloses a pair of shoes. FIG. 1  “Disclosed is a pair of golf shoes, each comprising an outsole provided with a plurality of spikes protruded from a lower surface of the outsole, in 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

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	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.
1[a] a left foot shoe including:	The ’181 publication discloses a left foot shoe. FIG. 1  “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.
1[b] a left upper shoe portion; and	The ’181 publication discloses a left upper shoe portion.

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	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].
1[c] a left sole coupled to the left upper shoe portion, wherein a foot platform of the left sole provides an athletic positioning of a left big toe area of the left shoe at a lower position than a left heel area of the left shoe and at a lower position than an outer small toe area of the left shoe, wherein, from an inner edge to	The ’181 publication discloses a left sole coupled to the left upper shoe portion, wherein a foot platform of the left sole provides an athletic positioning of a left big toe area of the left shoe at a lower position than a left heel area of the left shoe and at a lower position than an outer small toe area of the left shoe, wherein, from an inner edge to an outer edge of the left shoe, the left heel area has substantially no slope, and wherein, from the inner edge to the outer edge of the left shoe at a cross section at a ball of ball, a bottom of the left sole is substantially linear. “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 weight balance on the inner edges of soles of feet during the address and swing motions, thus allowing

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an outer edge of the left shoe, the left heel area has substantially no slope, and wherein, from the inner edge to the outer edge of the left shoe at a cross section at a ball of ball, a bottom of the left sole is substantially linear; and	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].

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

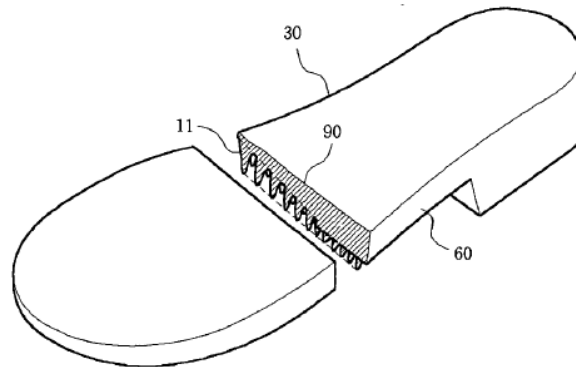
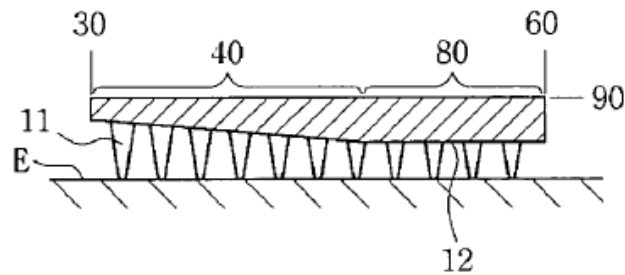
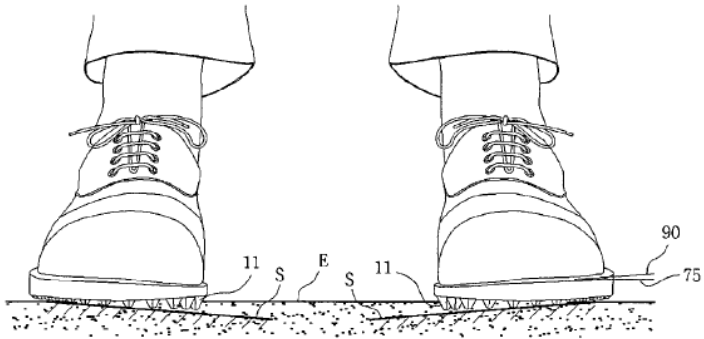
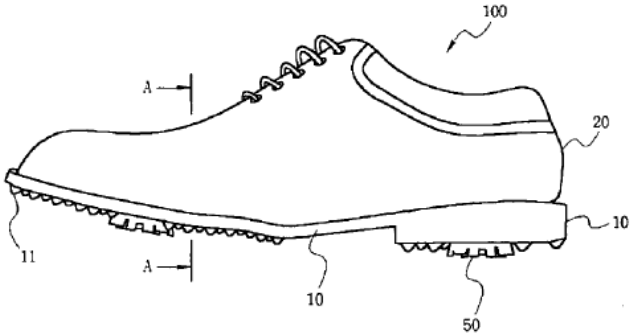
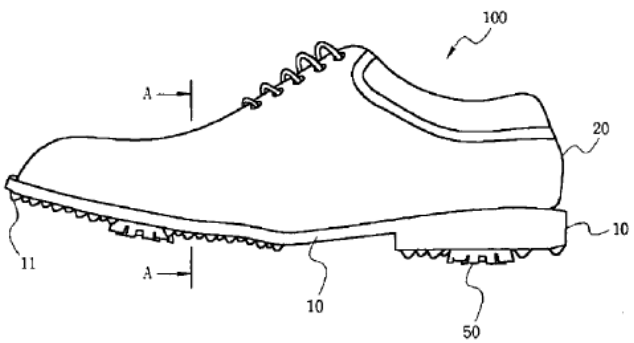


FIG. 3b

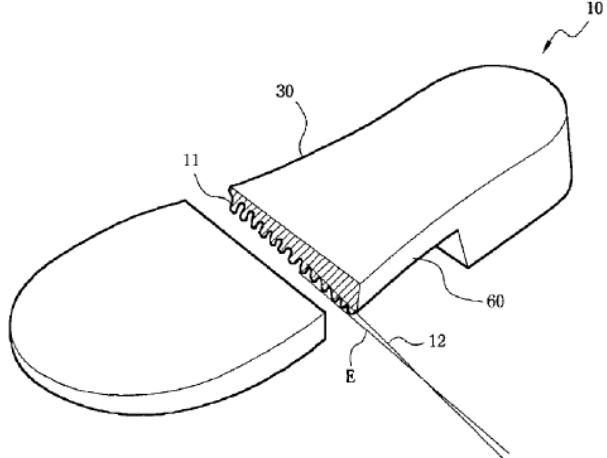


“FIGS. 3a and 3b illustrate an outsole of a golf shoe in accordance with another embodiment of the present invention. In this embodiment, the height of the spikes 11 at the inner edge 30 of the outsole 10 is larger than that of the spikes 11 at the outer edge 60 of the outsole 10. However, the lower 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].
1[d] a right foot shoe including:	The ’181 publication discloses a right foot shoe.

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	FIG. 1  “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.” ’181 publication, Abstract.
1[e] a right upper shoe portion; and	The ’181 publication discloses a right upper shoe portion. FIG. 1 

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	“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].
1[f] a right sole coupled to the right upper shoe portion, wherein a foot platform of the right sole provides an athletic positioning of a right big toe area of the right shoe at a lower position than a right heel area of the right shoe and at a lower position than an outer small toe area of the right shoe and wherein, from an inner edge to an outer edge of the right shoe, the right heel area has substantially no slope, and wherein, from the inner edge to the outer edge of the right shoe at a cross section at a ball of ball, a bottom of the right sole is substantially linear.	The ’181 publication discloses a right sole coupled to the right upper shoe portion, wherein a foot platform of the right sole provides an athletic positioning of a right big toe area of the right shoe at a lower position than a right heel area of the right shoe and at a lower position than an outer small toe area of the right shoe and wherein, from an inner edge to an outer edge of the right shoe, the right heel area has substantially no slope, and wherein, from the inner edge to the outer edge of the right shoe at a cross section at a ball of ball, a bottom of the right sole is substantially linear. “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 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

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	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]. 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

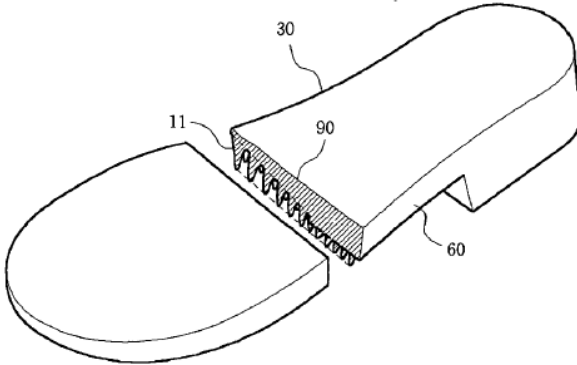
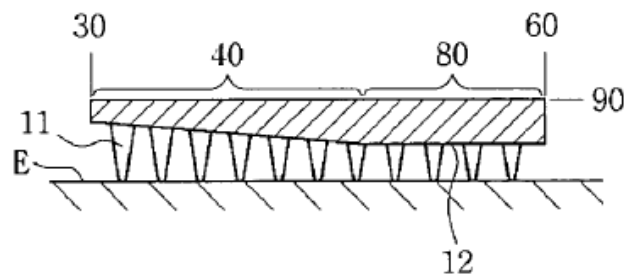
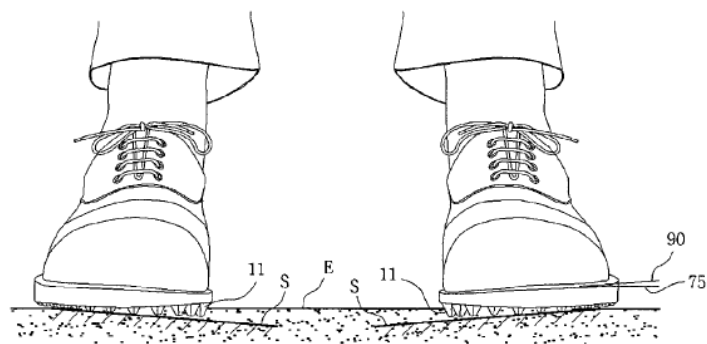
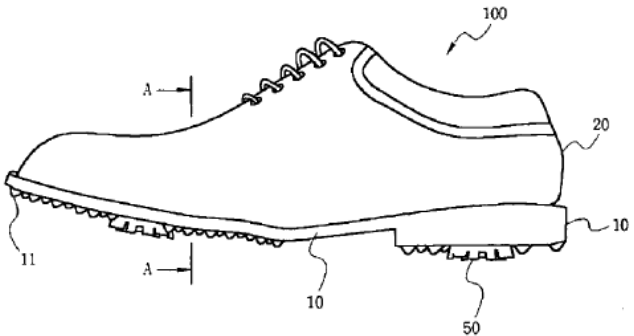
U.S. Patent No. 11,064,760	U.S. Patent Pub. No. 2004/0040181
	surface 12 inclined from its outer edge 60 to its inner edge 30 so that the outer edge 60 has a thickness larger than that of the inner edge 30. Except for the outsole 10 including the inclined lower surface 12, the golf shoe 100 of the present 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 

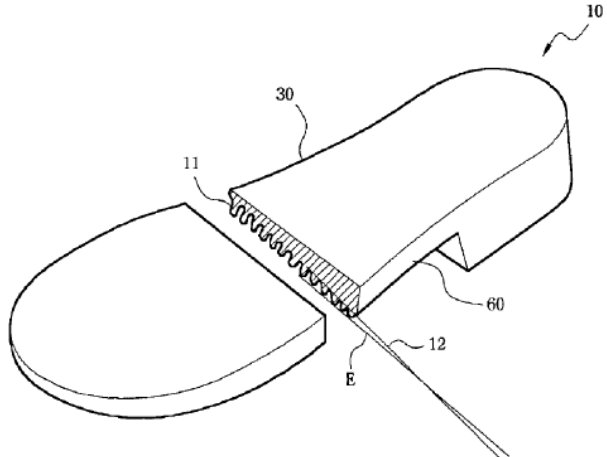
FIG. 3b

“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

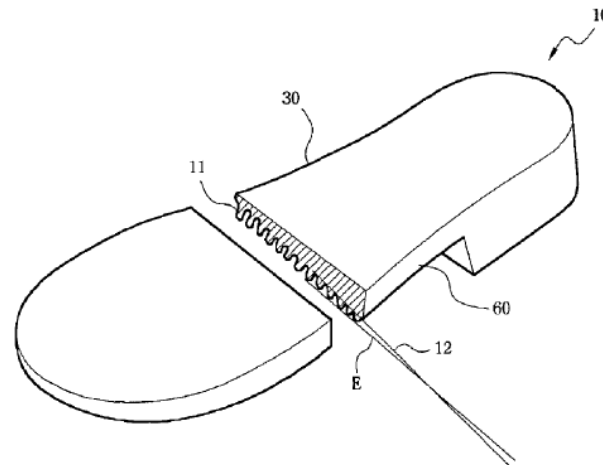
“FIG. 5b is a schematic view illustrating feet of a golfer in a pair of the golf shoes 100 of the present invention standing on the ground E of a green. When the golfer in a pair of the golf shoes 100 of the

U.S. Patent No. 11,064,760	U.S. Patent Pub. No. 2004/0040181
	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].
2[a]. The pair of shoes of claim 1, wherein the foot platform of the left sole comprises: a heel section that, from the inner edge to the outer edge of the left shoe, has substantially no slope;	The ’181 publication discloses a heel section that, from the inner edge to the outer edge of the left shoe, has substantially no slope. FIG. 1 

U.S. Patent No. 11,064,760	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]. “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].
2[b] a toe section that provides the left big toe area of the left shoe at the lower position than the left heel area	The ’181 publication discloses a toe section that provides the left big toe area of the left shoe at the lower position than the left heel area of the left shoe and at the lower position than the outer small toe area of the left shoe.

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of the left shoe and at the lower position than the outer small toe area of the left shoe; and	“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 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].

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

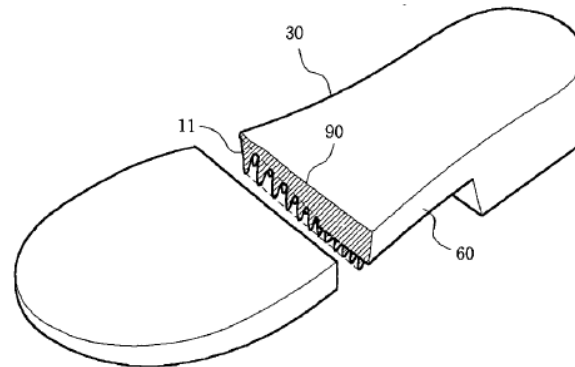
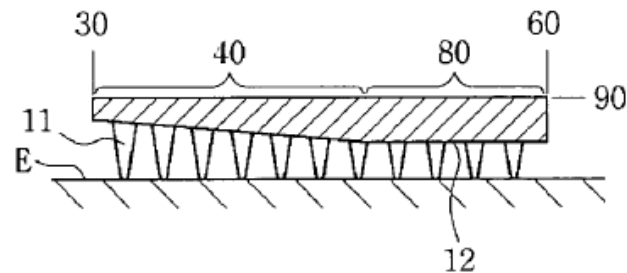


FIG. 3b



“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].

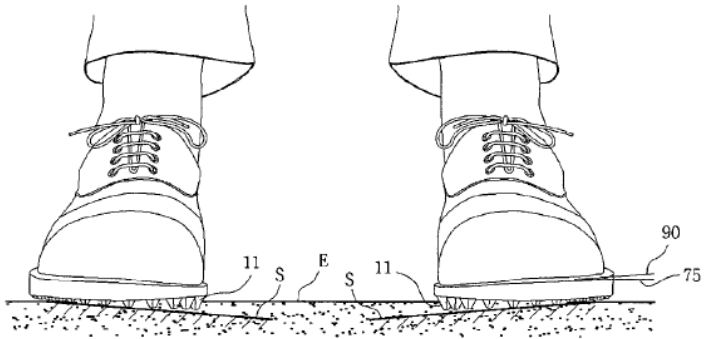
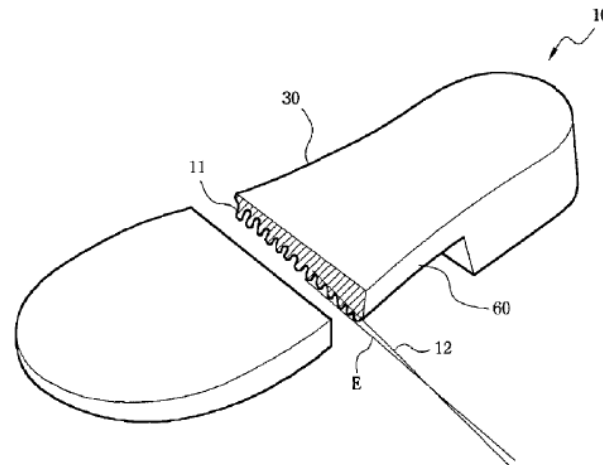
U.S. Patent No. 11,064,760	U.S. Patent Pub. No. 2004/0040181
	FIG. 5b  “FIG. 5<i>b</i> is a schematic view illustrating feet of a golfer in a pair of the golf shoes 100 of the present invention standing on the ground E of a green. When the golfer in a pair of the golf shoes 100 of the present invention 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].
2[c] a mid-foot section having a shape to transition from the heel section to the toe section.	The ’181 publication discloses a mid-foot section having a shape to transition from the heel section to the toe section.

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].

FIG. 3a

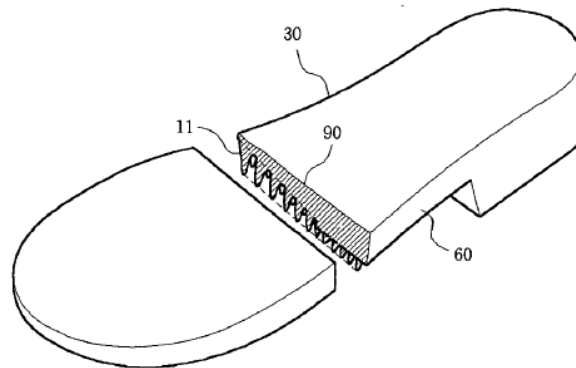
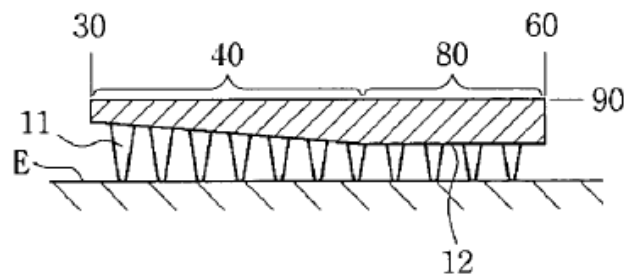
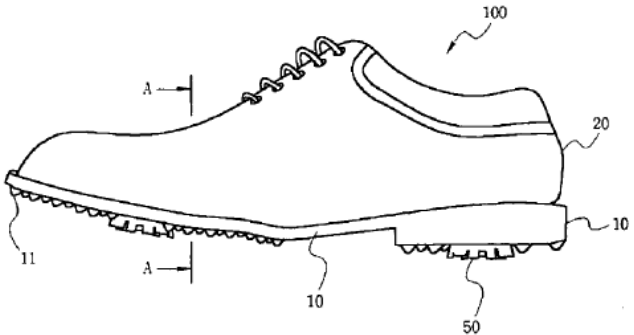
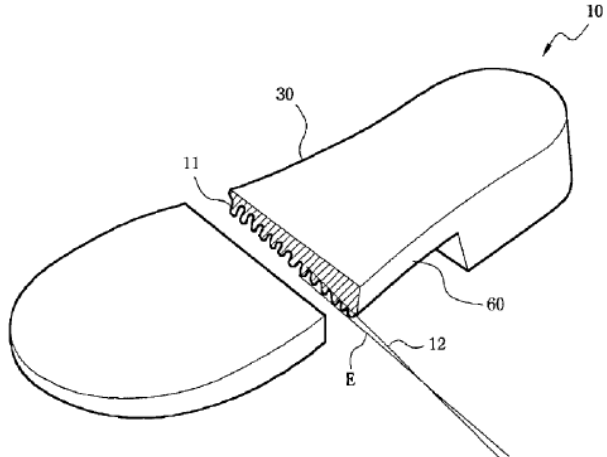


FIG. 3b



“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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	“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 pair of shoes of claim 2, wherein the heel section of the foot platform of the left sole comprises: a heel platform that includes a surface having substantially no slope from the inner edge to the outer edge of the left shoe and for a length of the surface, wherein, when the left shoe is worn, the heel platform supports a left heel of a wearer.	The ’181 publication discloses a heel platform that includes a surface having substantially no slope from the inner edge to the outer edge of the left shoe and for a length of the surface, wherein, when the left shoe is worn, the heel platform supports a left heel of a wearer. FIG. 1 

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	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]. “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].
4. The pair of shoes of claim 2, wherein the toe section of	To the extent that the ‘181 publication does not expressly or inherently disclose a stabilizing cup in the left big toe area, wherein, when the left shoe is worn, the stabilizing cup functions to, at least one of,

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the foot platform of the left sole comprises: a stabilizing cup in the left big toe area, wherein, when the left shoe is worn, the stabilizing cup functions to, at least one of, stabilize and position a left big toe of a wearer in a particular location in the left big toe area.	stabilize and position a left big toe of a wearer in a particular location in the left big toe area, it would have been obvious to a person of ordinary skill in the art at the time of the alleged invention of the '760 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 '760 Patent Obviousness Chart (Exhibit S), for the reasons discussed in that chart.
5. The pair of shoes of claim 2, wherein the toe section of the foot platform of the left sole comprises: a stabilizing cup in the left big toe area, wherein, when the left shoe is worn, the stabilizing cup functions to, at least one of, stabilize and position a left ball-of-foot of a wearer in a particular location in the left big toe area.	To the extent that the '181 publication does not expressly or inherently disclose a stabilizing cup in the left big toe area, wherein, when the left shoe is worn, the stabilizing cup functions to, at least one of, stabilize and position a left ball-of-foot of a wearer in a particular location in the left big toe area, it would have been obvious to a person of ordinary skill in the art at the time of the alleged invention of the '760 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 '760 Patent Obviousness Chart (Exhibit S), for the reasons discussed in that chart.
6. The pair of shoes of claim 1, wherein the foot platform of the left sole comprises:	The '181 publication discloses a specific bottom that includes one of a sport specific tread pattern, a spike pattern, a sliding coupling pattern, and a cleat pattern.

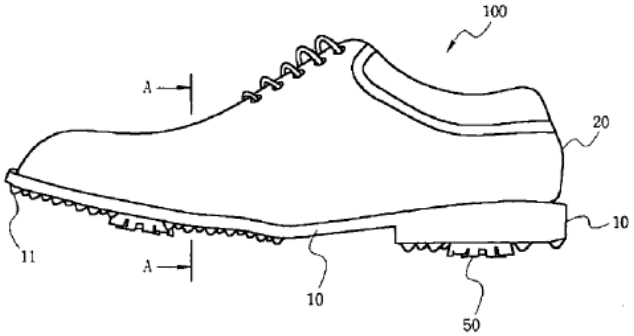
U.S. Patent No. 11,064,760	U.S. Patent Pub. No. 2004/0040181
a specific bottom that includes one of: a sport specific tread pattern; a spike pattern; a sliding coupling pattern; and a cleat pattern.	FIG. 1  “Disclosed is a pair of golf shoes, each comprising an outsole provided with a plurality of spikes 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.
7[a]. The pair of shoes of claim 1, wherein the foot platform of the right sole comprises: a heel section that, from the inner edge to the outer edge of the right shoe, has substantially no slope;	The ’181 publication discloses a heel section that, from the inner edge to the outer edge of the right shoe, has substantially no slope.

FIG. 1

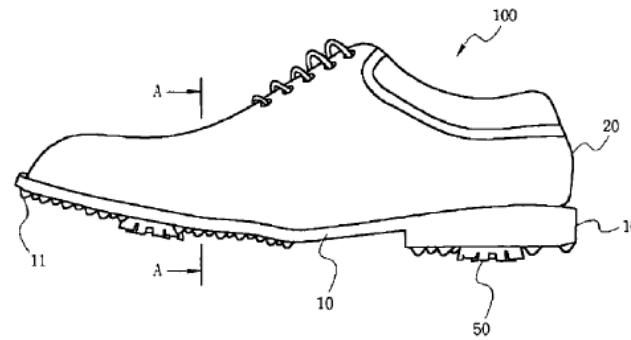
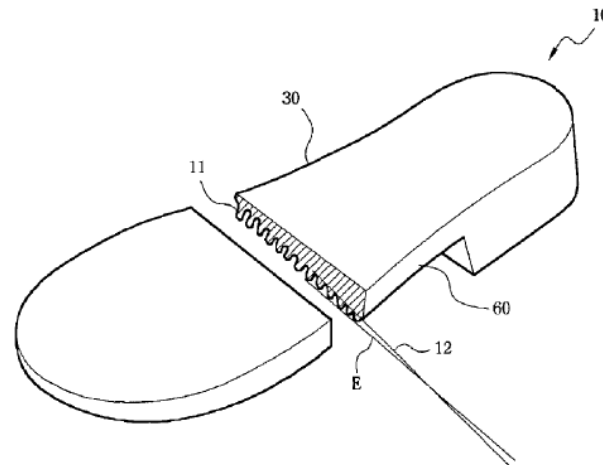
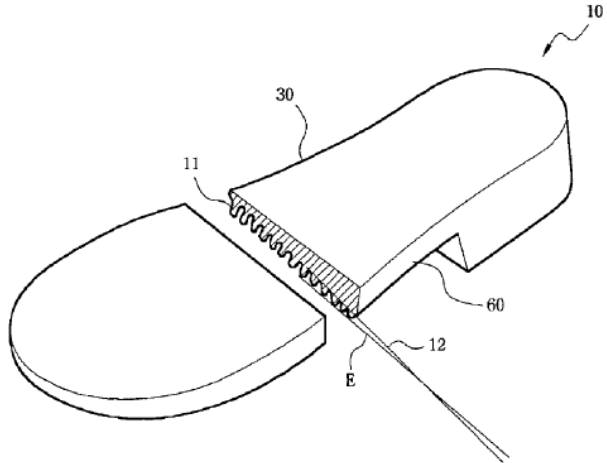


FIG. 2



“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].
7[b] a toe section that provides the right big toe area of the right shoe at the lower position than the left heel area of the right shoe and at the lower position than the outer small toe edge area of the right shoe; and	The ’181 publication discloses a toe section that provides the right big toe area of the right shoe at the lower position than the left heel area of the right shoe and at the lower position than the outer small toe edge area of the right shoe. “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 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

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	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

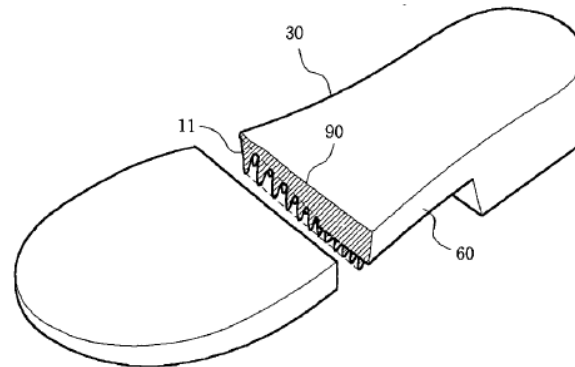
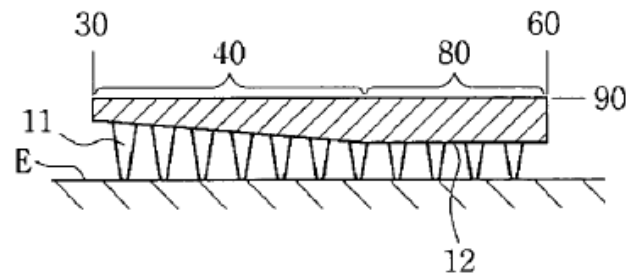
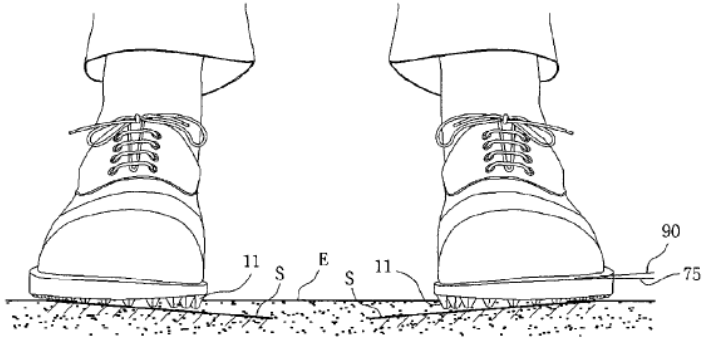


FIG. 3b

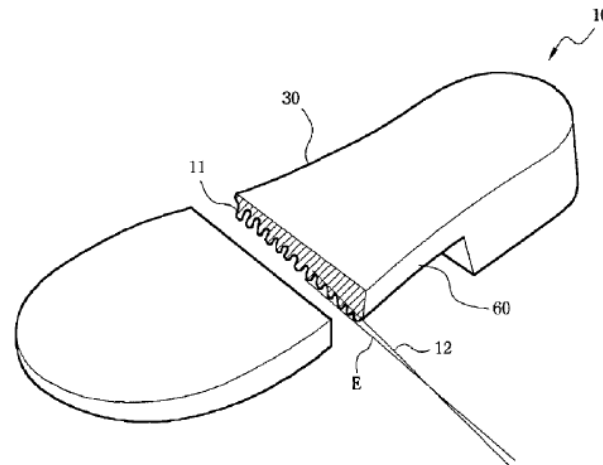


“FIGS. 3a and 3b illustrate an outsole of a golf shoe in accordance with another embodiment of the present invention. In this embodiment, the height of the spikes 11 at the inner edge 30 of the outsole 10 is larger than that of the spikes 11 at the outer edge 60 of the outsole 10. However, the lower surface 12 of the outsole 10 is not gradually inclined from the outer edge 60 to the inner edge 30, but includes a

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	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].
7[c] a mid-foot section having a shape to transition	The ’181 publication discloses a mid-foot section having a shape to transition from the heel section to the toe section.

from the heel section to the toe section.

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].

FIG. 3a

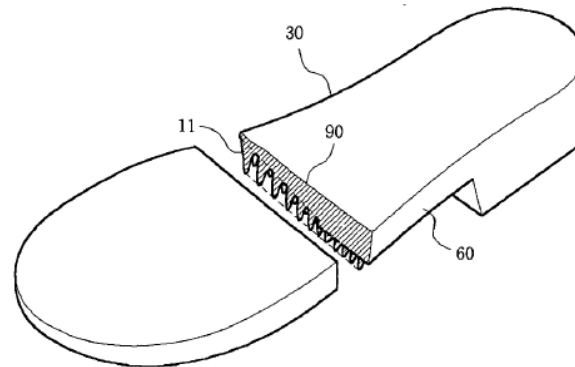
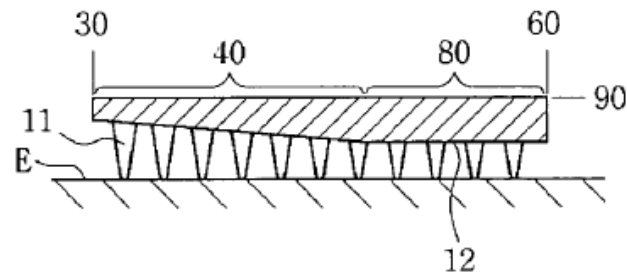
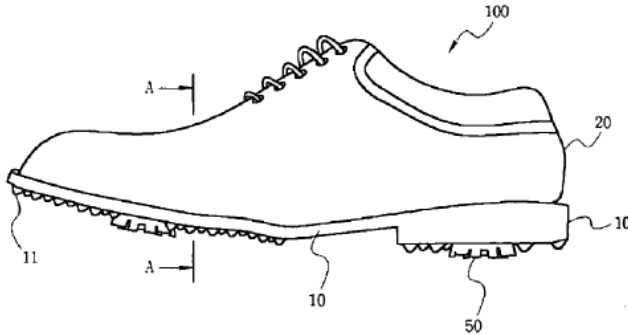
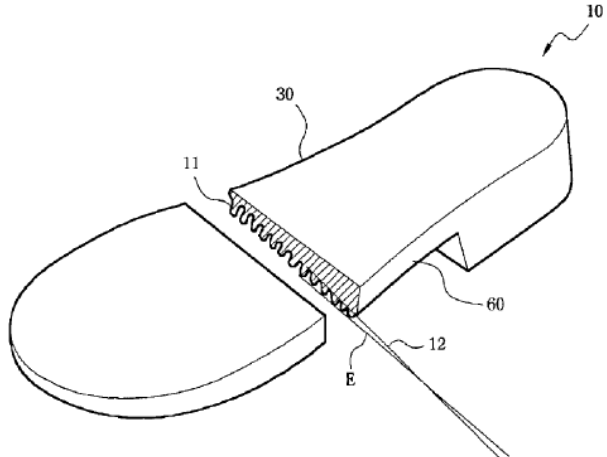


FIG. 3b

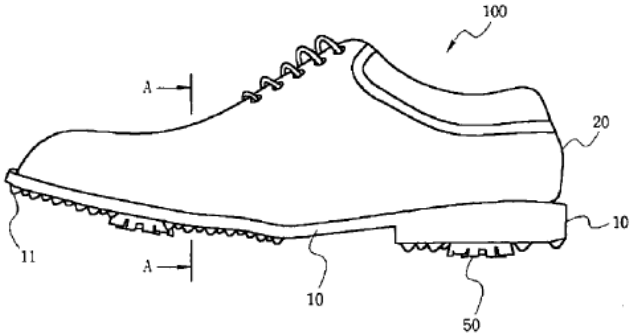


“FIGS. 3a and 3b illustrate an outsole of a golf shoe in accordance with another embodiment of the present invention. In this embodiment, the height of the spikes 11 at the inner edge 30 of the outsole 10 is larger than that of the spikes 11 at the outer edge 60 of the outsole 10. However, the lower 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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	“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].
8. The pair of shoes of claim 7, wherein the heel section of the foot platform of the right shoe comprises: a heel platform that includes a surface having substantially no slope from the inner edge to the outer edge of the right shoe and for a length of the surface, wherein, when the right shoe is worn, the heel platform supports a right heel of a wearer.	The ’181 publication discloses a heel platform that includes a surface having substantially no slope from the inner edge to the outer edge of the right shoe and for a length of the surface, wherein, when the right shoe is worn, the heel platform supports a right heel of a wearer. FIG. 1 

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	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]. “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].
9. The pair of shoes of claim 7, wherein the toe section of	To the extent that the ‘181 publication does not expressly or inherently disclose a stabilizing cup in the right big toe area, wherein, when the right shoe is worn, the stabilizing cup functions to, at least one

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the foot platform of the right sole comprises: a stabilizing cup in the right big toe area, wherein, when the right shoe is worn, the stabilizing cup functions to, at least one of, stabilize and position a right big toe of a wearer in a particular location in the right big toe area.	of, stabilize and position a right big toe of a wearer in a particular location in the right big toe area, it would have been obvious to a person of ordinary skill in the art at the time of the alleged invention of the '760 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 '760 Patent Obviousness Chart (Exhibit S), for the reasons discussed in that chart.
10. The pair of shoes of claim 7, wherein the toe section of the foot platform of the right sole comprises: a stabilizing cup in the right big toe area, wherein, when the right shoe is worn, the stabilizing cup functions to, at least one of, stabilize and position a right ball-of-foot of a wearer in a particular location in the right big toe area.	To the extent that the '181 publication does not expressly or inherently disclose a stabilizing cup in the right big toe area, wherein, when the right shoe is worn, the stabilizing cup functions to, at least one of, stabilize and position a right ball-of-foot of a wearer in a particular location in the right big toe area, it would have been obvious to a person of ordinary skill in the art at the time of the alleged invention of the '760 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 '760 Patent Obviousness Chart (Exhibit S), for the reasons discussed in that chart.
11. The pair of shoes of claim 1, wherein the foot platform of the right sole comprises:	The '181 publication discloses a specific bottom that includes one of a sport specific tread pattern, a spike pattern, a sliding coupling pattern, and a cleat pattern.

U.S. Patent No. 11,064,760	U.S. Patent Pub. No. 2004/0040181
a specific bottom that includes one of: a sport specific tread pattern; a spike pattern; a sliding coupling pattern; and a cleat pattern.	FIG. 1  “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.