

EXHIBIT S – U.S. Patent No. 11,064,760 OBVIOUSNESS CHART

Reference	Date of Filing / Publication	Title
U.S. Patent No. 6,880,266	Apr. 19, 2005	FOOTWEAR SOLE
U.S. Patent No. 4,535,554	Aug. 20, 1985	MOLDED FOOTWEAR
U.S. Patent Publication No. 2009/0307925	Dec. 17, 2009	SHOE SOLE ELEMENT
U.S. Patent Publication No. 2006/0090377	May 4, 2006	SOLE FOR FOOTWEAR
U.S. Patent No. 6,604,301	Aug. 12, 2003	SHOE SOLE INSERT
J.P. Patent 5,438,023	Nov. 21, 2008	INSOLE FOR ARTHRITIS AND DIABETES

The above referenced patents and publications, in combination with each other and/or in combination with the other charted references, render obvious claims 1-9 and 11 of US Patent No. 11,064,760. 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.

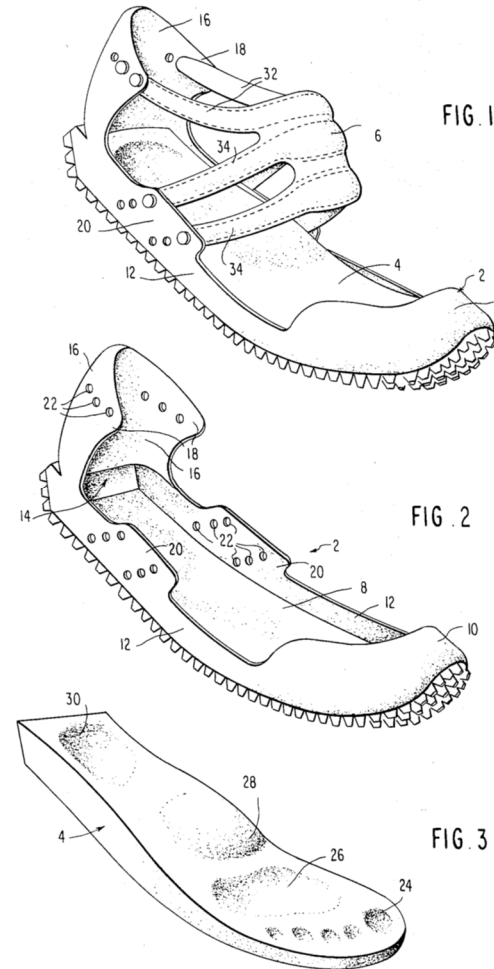
U.S. Patent No. 11,064,760	Prior Art References
1[pre]. A pair of shoes comprises:	The primary references all disclose a pair of shoes. To the extent a reference discloses only a single shoe, or a right or left shoe and not the other, a person of skill in the art would know that the shoe could be modified to fit the other foot, <i>e.g.</i> provided in a mirror image design, as was common practice since shoes were first invented.
1[a] a left foot shoe including:	The primary references all disclose a left foot shoe.

	To the extent a reference discloses only a single shoe, or a right or left shoe and not the other, a person of skill in the art would know that the shoe could be modified to fit the other foot, <i>e.g.</i> provided in a mirror image design, as was common practice since shoes were first invented.
1[b] a left upper shoe portion; and	The primary references all disclose a left upper shoe portion.
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 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 primary references all disclose 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.
1[d] a right foot shoe including:	The primary references all disclose a right foot shoe. To the extent a reference discloses only a single shoe, or a right or left shoe and not the other, a person of skill in the art would know that the shoe could be modified to fit the other foot, <i>e.g.</i> provided in a mirror image design, as was common practice since shoes were first invented.

1[e] a right upper shoe portion; and	The primary references all disclose a right upper shoe portion.
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 primary references all disclose 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.
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 primary references all disclose a heel section that, from the inner edge to the outer edge of the left shoe, has substantially no slope.

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 of the left shoe and at the lower position than the outer small toe area of the left shoe; and	The primary references all disclose 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.
2[c] a mid-foot section having a shape to transition from the heel section to the toe section.	The primary references all disclose a mid-foot section having a shape to transition from the heel section to the toe section.
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 primary references all disclose 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.
4. 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,	A pair of shoes comprising a stabilizing cup as described in claim 4 was well known when the '760 patent was filed. To the extent Plaintiff argues that any reference fails to disclose this element, it would have been obvious to a person of ordinary skill based on the primary reference in view of any one of the references below. At least the following references disclose this element and would have been obvious to combine with the primary references in for the reasons discussed below:

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.



“As best shown in FIG. 2, the body member 2 is a single piece of molded plastic material which has a sole portion 8, a toe cup 10, longitudinal sidewalls 12, and a rear portion which has a forwardly open pocket 14 and a heel Cup 16.” ‘554 patent, 2:33-37.

“FIG. 3 shows that the upper surface of the foot support member is configured to correspond to and provide anatomical support for the wearer's foot. Preferably, this configuration includes at least one toe recess 24, a recess 26 for accommodating a ball of the wearer's foot, a raised arch support portion 28, and a recess 30 for accommodating the heel of a wearer's foot.” ‘554 patent, 2:63-68.

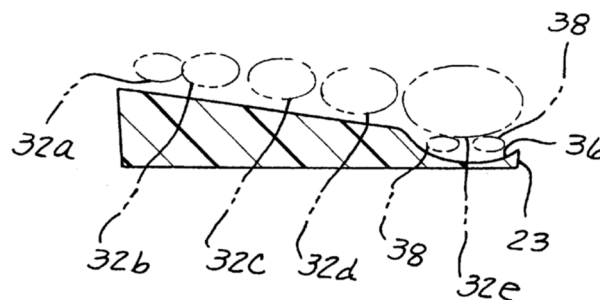


FIG. 4A

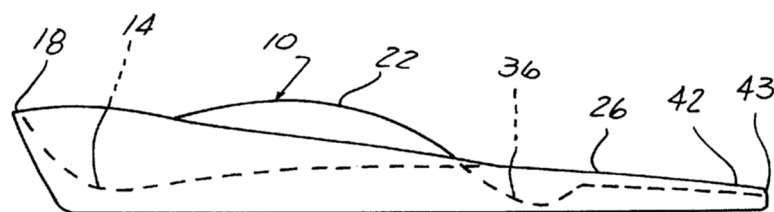


FIG. 5

As can be seen in FIG. 4A, the most prominent point in the elevation is located in the approximate region of the fifth metatarsal head 32a, decreasing in elevation near the Sulcus region 34 between the toes and the metatarsal heads 32a, b, c, d, e. ... The forefoot 26 could also have a depression 36 formed for receiving the first metatarsal head 32b, as shown in FIG. 4A. ‘301 patent at 3:26-42.

The depression 36 is formed at the first metatarsal head 32e and sesamoids 38 to accommodate the plantar flexed first ray 40 of the cavus foot. The plantar flexed first metatarsal head 32e acts pathologically by Striking the ground or Shoe first, and preventing the entire foot from pronating. By Supporting the Surrounding areas of the foot and allowing the first metatarsal head 32e and sesamoids 38 to drop below the

level of the lateral metatarsal heads 32a-32d, the insert 10 of the present invention allows the cavus foot to have a more normal biomechanical function. '301 patent at 3:46-56.

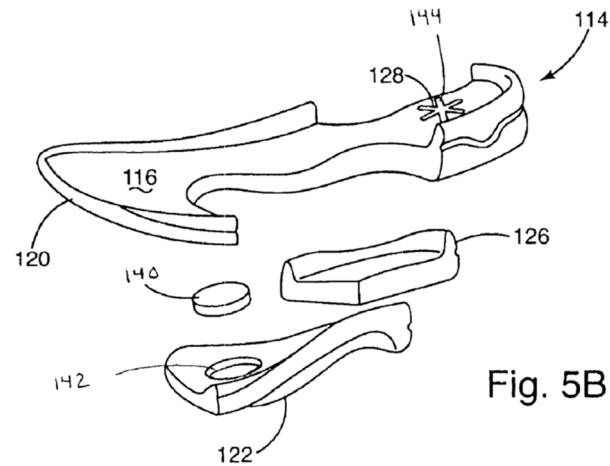


Fig. 5B

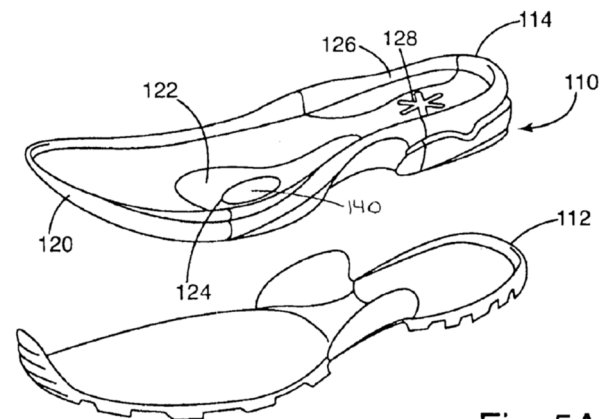
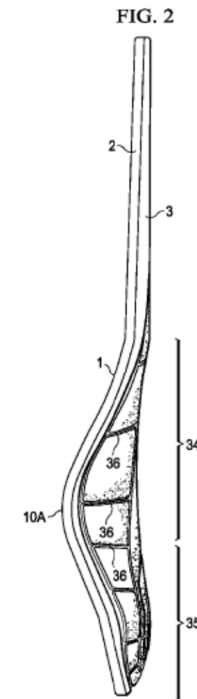
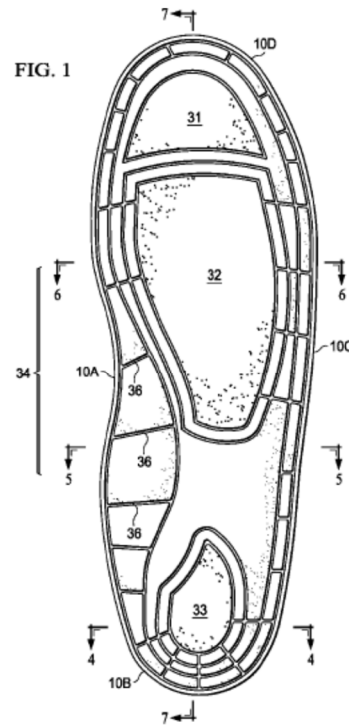


Fig. 5A

“The alternative sole 110 is generally identical to the sole 10 described above, except as specifically described in the following Sentences. In this embodiment, the midsole 114 generally includes a neutral portion 120, a lateral alignment portion 122, a forefoot fixing portion 124, a medial alignment portion 126

and a heel fixing portion 128. As with the embodiment described above, the forefoot fixing portion 124, medial alignment portion 126 and heel fixing portion 128 are optional. The forefoot fixing portion 124 includes an insert 140 that is fitted into a corresponding void 142 in the lateral alignment portion 122, rather than extending entirely through the midsole 114 as in the above described embodiment. The insert 140 is manufactured from a material having a substantially lower durometer than the surrounding lateral alignment portion 122.” ’266 patent, 7:53-8:1.



JP’023, Fig 1.

“The lower layer has a shoe side surface that is intended to be placed adjacent to the foot receiving compartment of the shoe. Preferably, the shoe side surface further comprises one or more indentations each adapted to receive an insert layer. These depressions can be formed by providing the mold with a positive region that creates the depression. It is preferable that there is a depression in the heel region. A

toe depression can be provided in the toe region. A third indentation can be provided in the midfoot area, which can extend to the arch area. Any combination of these depressions can be provided on the book insole, for example, toes and heels, heels and midfoot, toes and heel and midfoot. The insole preferably includes a toe depression, a heel depression and a midfoot depression.” JP’023, [mechanical translation], p.2.

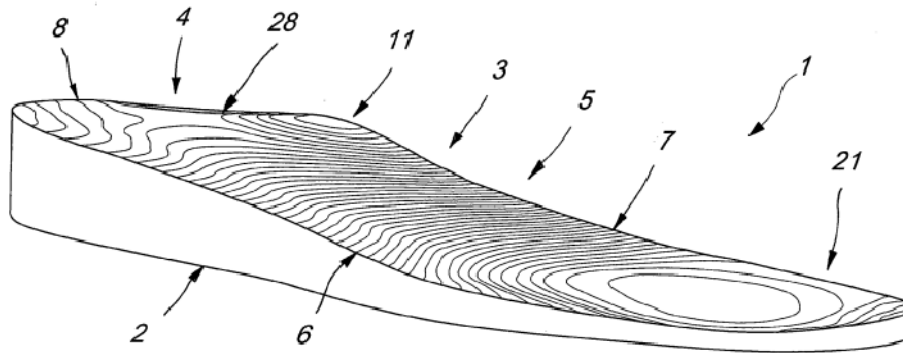


Fig. 1

Fig. 2

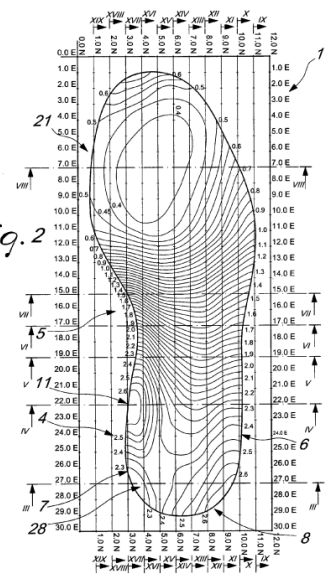


Fig. 7

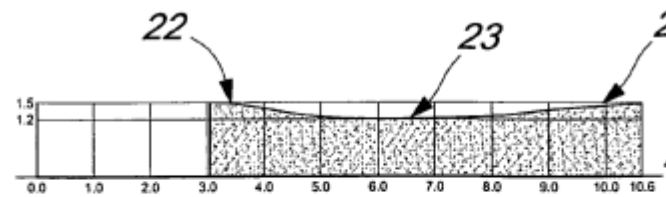
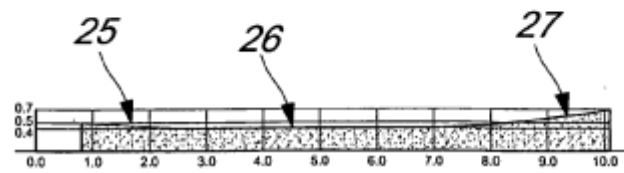


Fig. 8



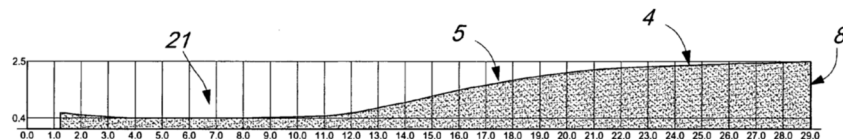


Fig. 14

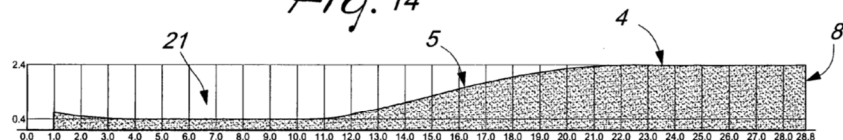


Fig. 15

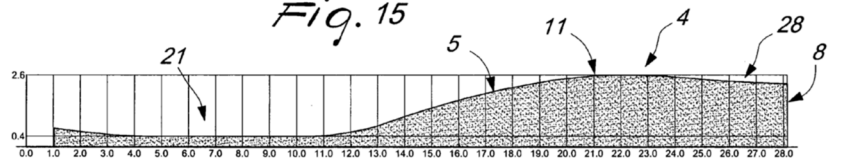


Fig. 16

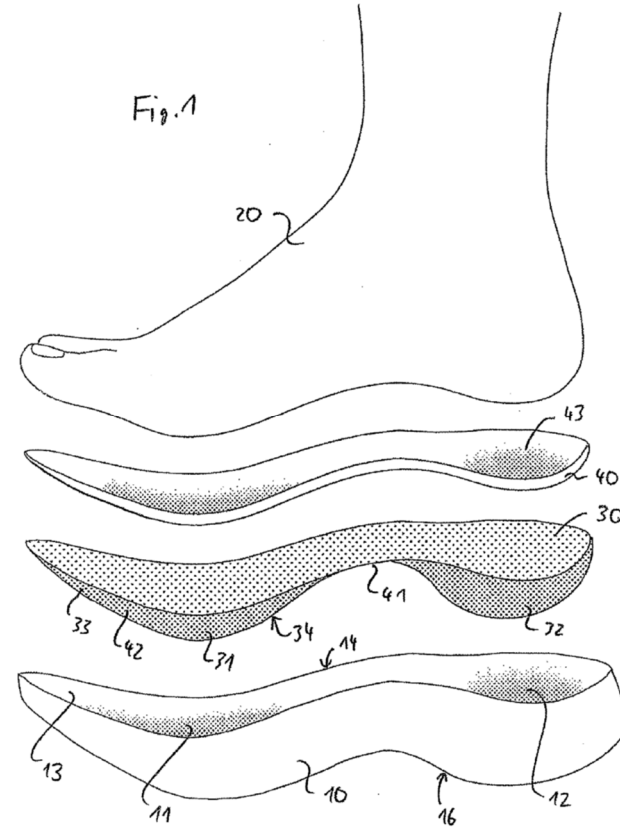
‘377 publication, Figs. 1, 2, 7, 8, 14-16.

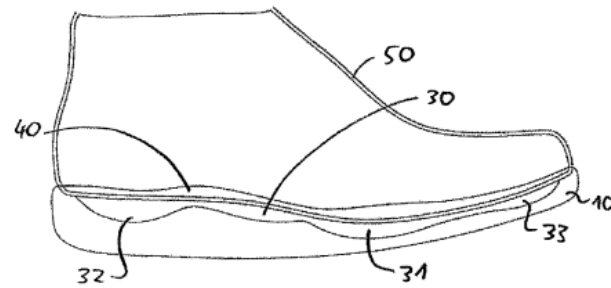
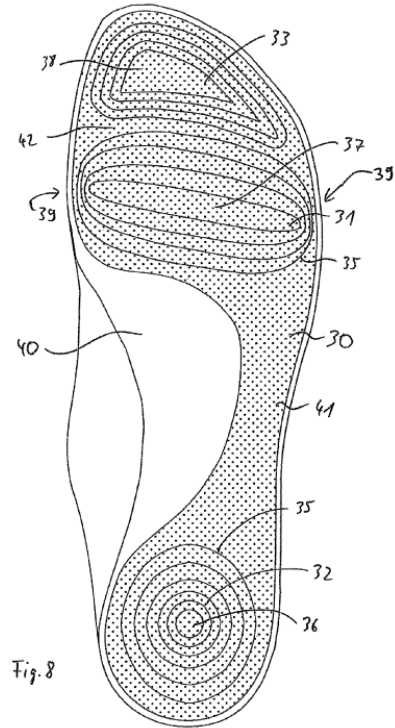
“The transverse profile of the sole 1, approximately in the region of the plantar arch that is adjacent to the metatarsal region 21, is shown in FIG. 7, which shows that it is constituted by a twelfth curved portion 22, which descends starting from the inner edge 7, at which it has a height of approximately 1.5 centimeters with respect to the lower face 2.” ‘377 publication, [0040]

“A thirteenth portion 23 is blended with the twelfth portion, is approximately flat and lies closer to the inner edge than to the outer edge, its lowest point being at a height of approximately 1.2 centimeters with respect to the base 2; said thirteenth portion in turn is blended with a fourteenth portion 24, which is curved and rises slightly up to the outer edge 6, at which it has approximately the same height as the inner edge 7.” ‘377 publication, [0041]

“FIG. 8 is a view of the transverse profile of the upper surface 3 of the sole 1 at the metatarsal region 21; said profile has, starting from the inner edge 7, which is arranged at a height of approximately 0.5 centimeters with respect to the lower face 2, a fifteenth curved and descending portion 25, which is

	blended with a sixteenth approximately flat portion 26, which lies closer to the inner edge than to the outer edge and has its lowest point at a height of approximately 0.4 centimeters with respect to the lower face 2; said sixteenth portion in turn is blended with a seventeenth curved portion 27, which rises up to the outer edge 6, at which it has a height of approximately 0.7 centimeters with respect to the base 2.” ‘377 publication, [0043]. “FIGS. 9 to 19 illustrate the longitudinal profile of the sole 1 along a corresponding number of longitudinal sectional planes, which show that the upper Surface 3 has a slightly concave shape at the metatarsal region 21.” ‘377 publication, [0044].
--	--





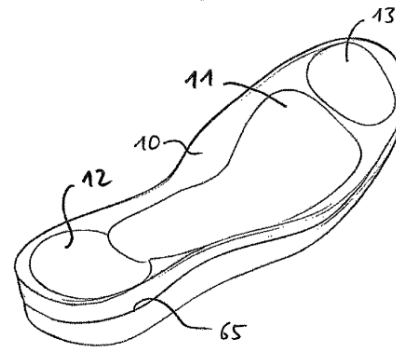


Fig. 16

'925 Publication, Figs. 4, 8, 10, 16.

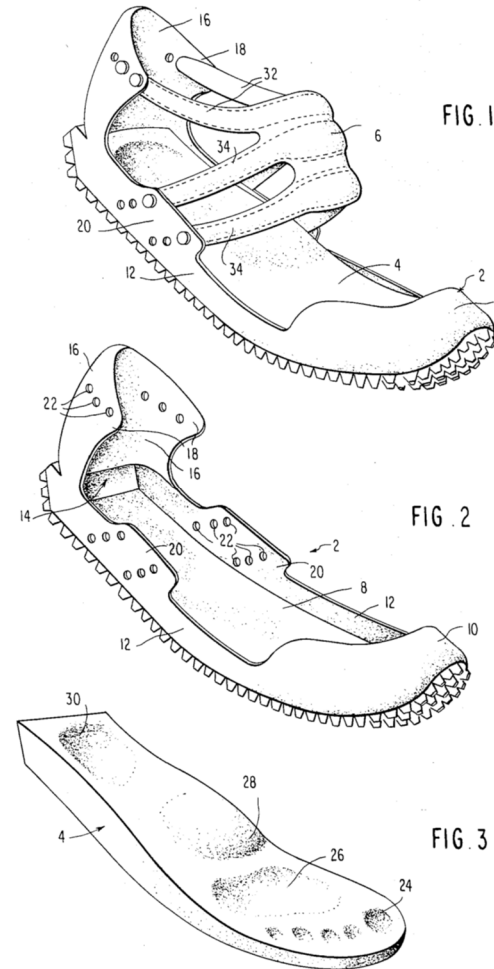
"Reference numeral 10 is provided to show the midsole, and/or outsole unit. The sole 10 can be the outsole, or be part of the outsole. The sole 10 can also comprise the midsole, the layer in between the outsole and the insole, which is typically used for shock absorption. It is relevant for the invention that the sole unit 10 comprises, within the portion which is oriented to the foot 20 of a user, at least two depressions 11 and 12, which can also be qualified as recesses. As it will be explained in connection with FIG. 8, the form of the recess 12 can be a rounded inverse cone, wherein the recess 11 can be a transverse oriented groove. Both recesses 11 and 12 can also have a form lying between a hollow inverse sphere portion and the form of the shown embodiments. Additionally, a front recess 13 can be provided, having an essentially more triangular form. The front recess 13 is arranged at the position of the toes." '925 Publication, [0061]

"It can be seen from FIG. 15 that the outsole 10 provides three depressions 11, 12 and 13. The heel depression 11 is connected with a transition zone ending in the ball depression 12. The toe depression 13 is a separated depression." '925 Publication, [0089].

"The invention relates to a shoe with a sole 10 and an insole 30, wherein the sole 10 comprises an upper surface 14 being in contact with the lower surface 34 of the insole 30. The insole 30 comprises at least two embossments 31, 32, 33 being in contact with the upper surface 14 of the sole 10 which is therefore

	configured as comprising complementary depressions 11, 12 and 13, respectively. The insole 30 is more rigid than the outsole 10 and is attached to the outsole 10, allowing a pivoting movement of the front and/or back portion of the harder intermediate insole 30 against the lower outsole surface 16 of the shoe in, at least, an essentially transverse direction to the longitudinal axis of the shoe. The embossment 32 of the heel is preferably a rounded cone or sphere (portion). The embossment 31 of the ball is preferably a rounded cone or sphere (portion) or has a rounded prism like form. The optional embossment 33 of the toes is preferably a rounded cone or sphere (portion) or having a triangular form for all toes or single rounded portions for single or group of toes.” ’925 Publication, [0101] “The lower part of the insole 30 comprises at least two embossments 31 and 32, and preferably a third front embossment 33. According to the teaching of the invention, the embossments 31 and 32 are complementary formed to the recesses 11 and 12, respectively.” ’925 publication, [0063]. A pair of shoes comprising a stabilizing cup as described in claim 4 would have been obvious 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 that time. It would have been obvious to a person of ordinary skill in the art to combine the teachings in each of the primary references in Exhibits D-F, W with the above teachings because the references both provide teachings in the field of footwear design, both seek to solve similar problems and the results of the combinations would have been predictable to one of ordinary skill in the art. The use of the above teachings in the charted references would be nothing more than the use of known shoe component to improve a similar pair of shoes in the same way. One of skill in the art would have been motivated to do so for the reasons identified by the above references, including to provide additional cushioning, comfort and/or stability in the shoe.
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	A pair of shoes comprising a stabilizing cup as described in claim 5 was well known when the ’760 patent was filed. To the extent Plaintiff argues that any reference fails to disclose this element, it would have been obvious to a person of ordinary skill based on the primary reference in view of any one of the references below. At least the following references disclose this element and would have been obvious to combine with the primary references in for the reasons discussed below:

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.



“As best shown in FIG. 2, the body member 2 is a single piece of molded plastic material which has a sole portion 8, a toe cup 10, longitudinal sidewalls 12, and a rear portion which has a forwardly open pocket 14 and a heel Cup 16.” ’554 patent, 2:33-37.

“FIG. 3 shows that the upper surface of the foot support member is configured to correspond to and provide anatomical support for the wearer's foot. Preferably, this configuration includes at least one toe

recess 24, a recess 26 for accommodating a ball of the wearer's foot, a raised arch support portion 28, and a recess 30 for accommodating the heel of a wearer's foot.” ’554 patent, 2:63-68.

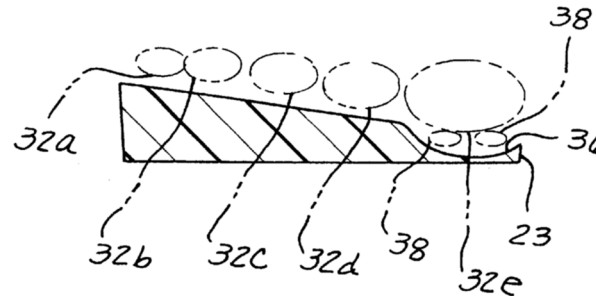


FIG. 4A

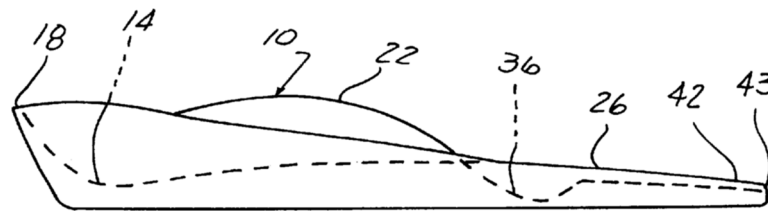


FIG. 5

“As can be seen in FIG. 4A, the most prominent point in the elevation is located in the approximate region of the fifth metatarsal head 32a, decreasing in elevation near the Sulcus region 34 between the toes and the metatarsal heads 32a, b, c, d, e. ... The forefoot 26 could also have a depression 36 formed for receiving the first metatarsal head 32b, as shown in FIG. 4A.” ’301 patent at 3:26-42.

“The depression 36 is formed at the first metatarsal head 32e and sesamoids 38 to accommodate the plantar flexed first ray 40 of the cavus foot. The plantar flexed first metatarsal head 32e acts pathologically by Striking the ground or Shoe first, and preventing the entire foot from pronating. By Supporting the Surrounding areas of the foot and allowing the first metatarsal head 32e and sesamoids 38 to drop below the level of the lateral metatarsal heads 32a-32d, the insert 10 of the present invention allows the cavus foot to have a more normal biomechanical function.” ’301 patent at 3:46-56.

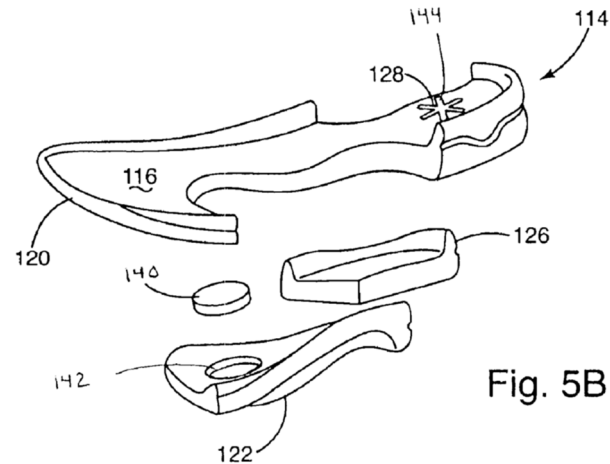


Fig. 5B

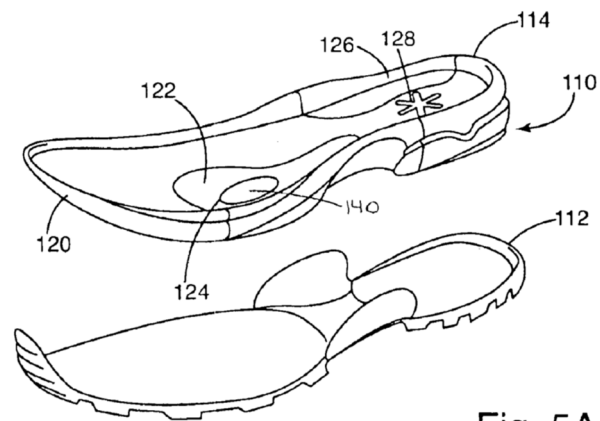
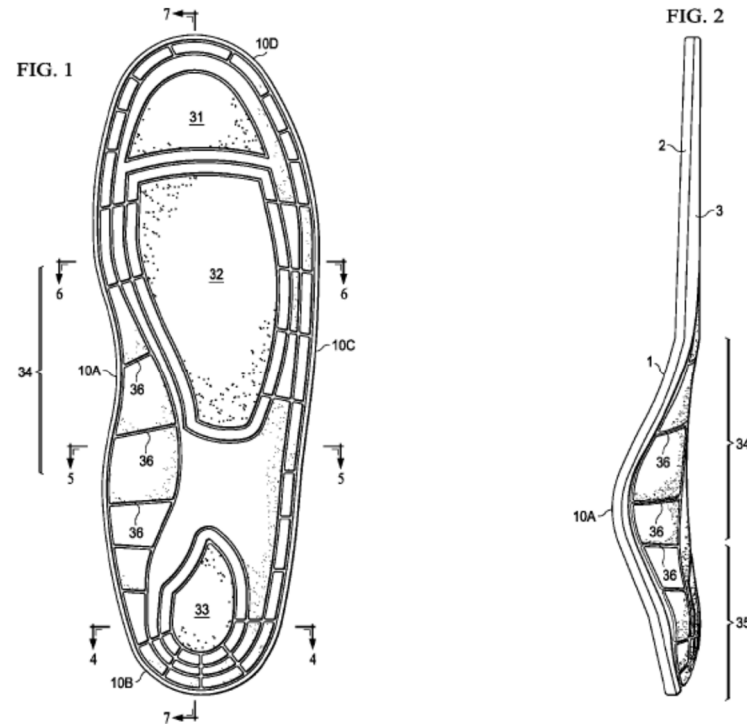


Fig. 5A

“The alternative sole 110 is generally identical to the sole 10 described above, except as specifically described in the following Sentences. In this embodiment, the midsole 114 generally includes a neutral portion 120, a lateral alignment portion 122, a forefoot fixing portion 124, a medial alignment portion 126 and a heel fixing portion 128. As with the embodiment described above, the forefoot fixing portion 124, medial alignment portion 126 and heel fixing portion 128 are optional. The forefoot fixing portion 124 includes an insert 140 that is fitted into a corresponding void 142 in the lateral alignment portion 122, rather

than extending entirely through the midsole 114 as in the above described embodiment. The insert 140 is manufactured from a material having a substantially lower durometer than the Surrounding lateral alignment portion 122.” ’266 patent, 7:53-8:1.



JP’023, Fig 1.

“The lower layer has a shoe side surface that is intended to be placed adjacent to the foot receiving compartment of the shoe. Preferably, the shoe side surface further comprises one or more indentations each adapted to receive an insert layer. These depressions can be formed by providing the mold with a positive region that creates the depression. It is preferable that there is a depression in the heel region. A toe depression can be provided in the toe region. A third indentation can be provided in the midfoot

area, which can extend to the arch area. Any combination of these depressions can be provided on the book insole, for example, toes and heels, heels and midfoot, toes and heel and midfoot. The insole preferably includes a toe depression, a heel depression and a midfoot depression.” JP’023, [mechanical translation], p.2.

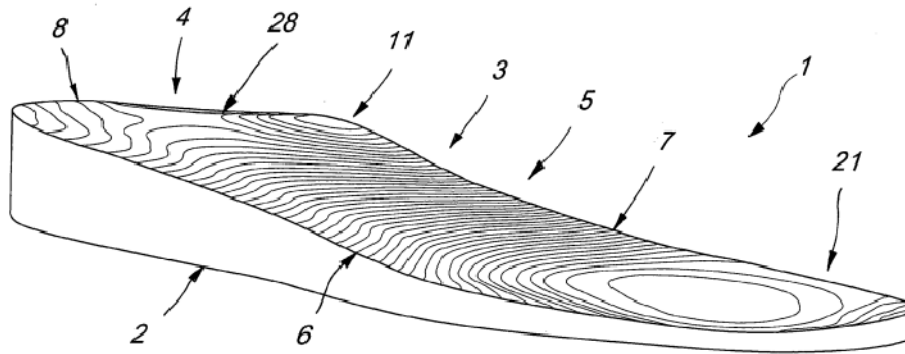
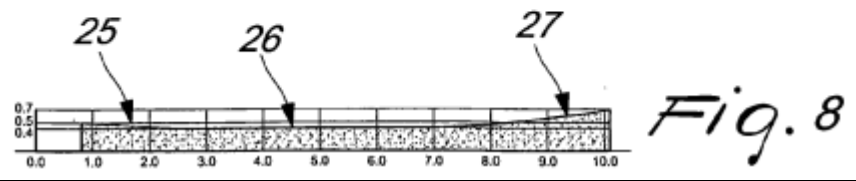
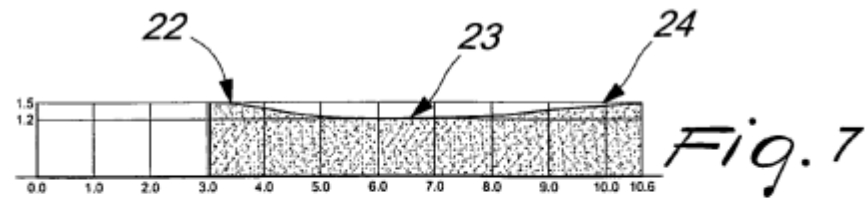
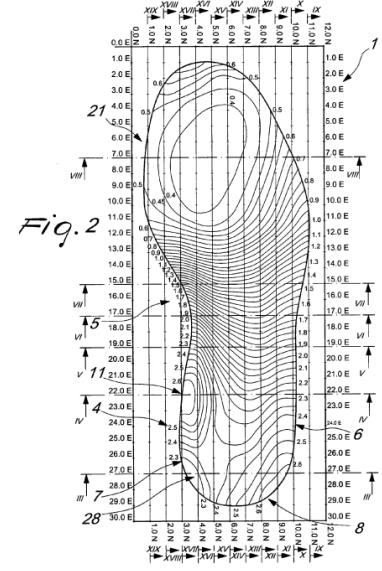


Fig. 1



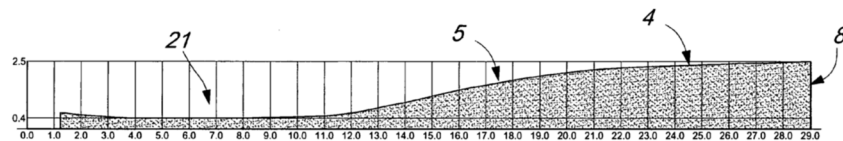


Fig. 14

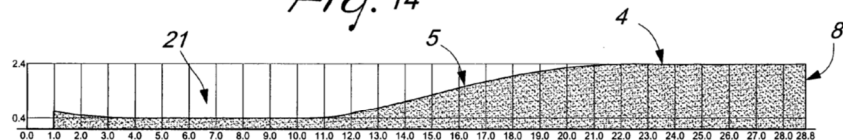


Fig. 15

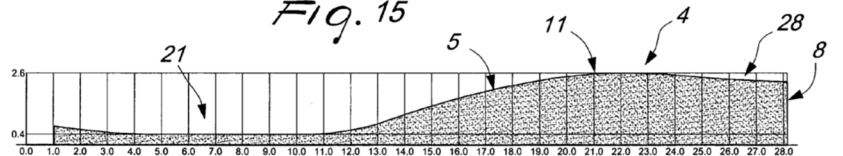


Fig. 16

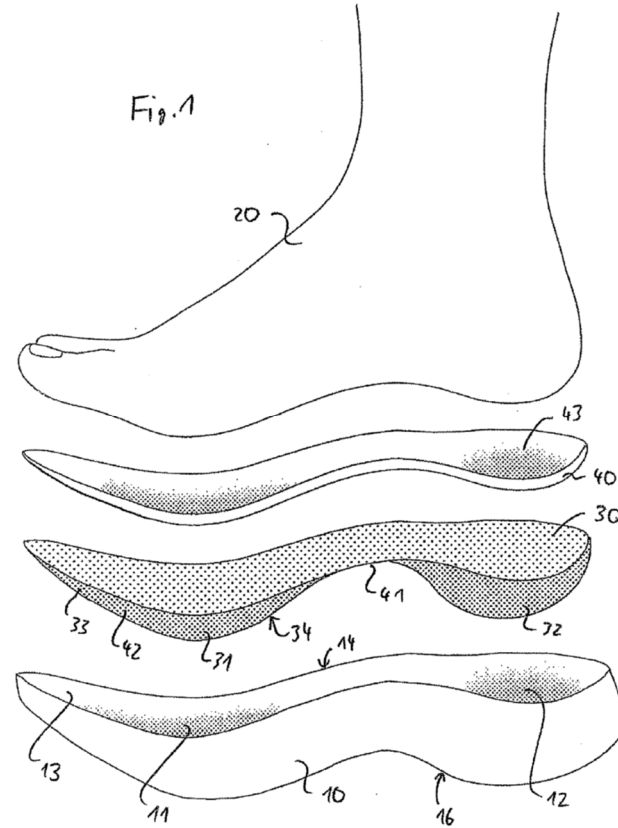
'377 publication, Figs. 1, 2, 7, 8, 14-16.

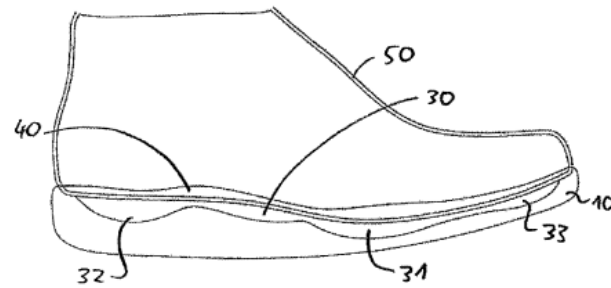
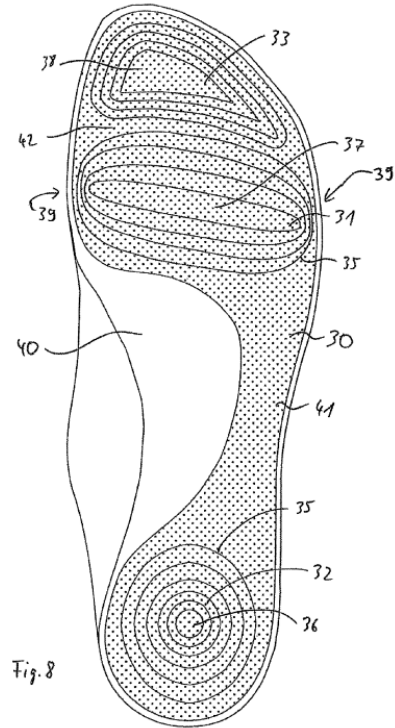
"The transverse profile of the sole 1, approximately in the region of the plantar arch that is adjacent to the metatarsal region 21, is shown in FIG. 7, which shows that it is constituted by a twelfth curved portion 22, which descends starting from the inner edge 7, at which it has a height of approximately 1.5 centimeters with respect to the lower face 2." '377 publication, [0040].

"A thirteenth portion 23 is blended with the twelfth portion, is approximately flat and lies closer to the inner edge than to the outer edge, its lowest point being at a height of approximately 1.2 centimeters with respect to the base 2; said thirteenth portion in turn is blended with a fourteenth portion 24, which is curved and rises slightly up to the outer edge 6, at which it has approximately the same height as the inner edge 7." '377 publication, [0041].

"FIG. 8 is a view of the transverse profile of the upper surface 3 of the sole 1 at the metatarsal region 21; said profile has, starting from the inner edge 7, which is arranged at a height of approximately 0.5 centimeters with respect to the lower face 2, a fifteenth curved and descending portion 25, which is

	blended with a sixteenth approximately flat portion 26, which lies closer to the inner edge than to the outer edge and has its lowest point at a height of approximately 0.4 centimeters with respect to the lower face 2; said sixteenth portion in turn is blended with a seventeenth curved portion 27, which rises up to the outer edge 6, at which it has a height of approximately 0.7 centimeters with respect to the base 2.” ’377 publication, [0043]. “FIGS. 9 to 19 illustrate the longitudinal profile of the sole 1 along a corresponding number of longitudinal sectional planes, which show that the upper Surface 3 has a slightly concave shape at the metatarsal region 21.” ’377 publication, [0044].
--	--





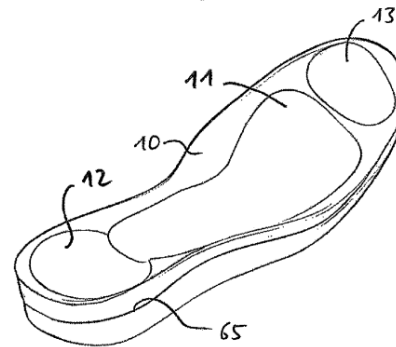


Fig. 16

'925 Publication, Figs. 4, 8, 10, 16.

"Reference numeral 10 is provided to show the midsole, and/or outsole unit. The sole 10 can be the outsole, or be part of the outsole. The sole 10 can also comprise the midsole, the layer in between the outsole and the insole, which is typically used for shock absorption. It is relevant for the invention that the sole unit 10 comprises, within the portion which is oriented to the foot 20 of a user, at least two depressions 11 and 12, which can also be qualified as recesses. As it will be explained in connection with FIG. 8, the form of the recess 12 can be a rounded inverse cone, wherein the recess 11 can be a transverse oriented groove. Both recesses 11 and 12 can also have a form lying between a hollow inverse sphere portion and the form of the shown embodiments. Additionally, a front recess 13 can be provided, having an essentially more triangular form. The front recess 13 is arranged at the position of the toes." '925 Publication, [0061].

"It can be seen from FIG. 15 that the outsole 10 provides three depressions 11, 12 and 13. The heel depression 11 is connected with a transition zone ending in the ball depression 12. The toe depression 13 is a separated depression." '925 Publication, [0089].

"The invention relates to a shoe with a sole 10 and an insole 30, wherein the sole 10 comprises an upper surface 14 being in contact with the lower surface 34 of the insole 30. The insole 30 comprises at least two embossments 31, 32, 33 being in contact with the upper surface 14 of the sole 10 which is therefore

	configured as comprising complementary depressions 11, 12 and 13, respectively. The insole 30 is more rigid than the outsole 10 and is attached to the outsole 10, allowing a pivoting movement of the front and/or back portion of the harder intermediate insole 30 against the lower outsole surface 16 of the shoe in, at least, an essentially transverse direction to the longitudinal axis of the shoe. The embossment 32 of the heel is preferably a rounded cone or sphere (portion). The embossment 31 of the ball is preferably a rounded cone or sphere (portion) or has a rounded prism like form. The optional embossment 33 of the toes is preferably a rounded cone or sphere (portion) or having a triangular form for all toes or single rounded portions for single or group of toes.” ’925 Publication, [0101]. A pair of shoes comprising a stabilizing cup as described in claim 5 would have been obvious 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 that time. It would have been obvious to a person of ordinary skill in the art to combine the teachings in each of the primary references in Exhibits D-F, W with the above teachings because the references both provide teachings in the field of footwear design, both seek to solve similar problems and the results of the combinations would have been predictable to one of ordinary skill in the art. The use of the above teachings in the charted references would be nothing more than the use of known shoe component to improve a similar pair of shoes in the same way. One of skill in the art would have been motivated to do so for the reasons identified by the above references, including to provide additional cushioning, comfort and/or stability in the shoe.
6. The pair of shoes of claim 1, wherein the foot platform of the left sole comprises: a specific bottom that includes one of: a sport specific tread pattern; a spike pattern;	The primary references all disclose a specific bottom that includes one of a sport specific tread pattern, a spike pattern, a sliding coupling pattern, and a cleat pattern.

a sliding coupling pattern; and a cleat pattern.	
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 primary references all disclose a heel section that, from the inner edge to the outer edge of the right shoe, has substantially no slope.
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 primary references all disclose 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.
7[c] a mid-foot section having a shape to transition from the heel section to the toe section.	The primary references all disclose a mid-foot section having a shape to transition from the heel section to the toe section.
8. The pair of shoes of claim 7, wherein the heel section of the foot	The primary references all disclose 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.

platform of the right sole 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.	
9. 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 big toe of a wearer in a particular location in the right big toe area.	A pair of shoes comprising a stabilizing cup as described in claim 9 was well known when the '760 patent was filed. See claim 4.
10. The pair of shoes of claim 7, wherein the toe	A pair of shoes comprising a stabilizing cup as described in claim 10 was well known when the '760 patent was filed. See claim 5.

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.	
11. The pair of shoes of claim 1, wherein the foot platform of the right sole comprises: a specific bottom that includes one of: a sport specific tread pattern; a spike pattern; a sliding coupling pattern; and a cleat pattern.	The primary references all disclose a specific bottom that includes one of a sport specific tread pattern, a spike pattern, a sliding coupling pattern, and a cleat pattern.