

## **Exhibit C-1**

### **Claim Chart Comparing the Dyson V15 Detect™ line and Dyson V15s Submarine™ line to U.S. Patent No. 8,607,407**

The Dyson V15 Detect™ line and Dyson V15s Submarine™ line<sup>1</sup> (the “V15 Accused Products”) include each and every limitation of (at least) each of claims 23-24 of U.S. Patent No. 8,607,407 (the “’407 Patent” and the “Asserted Claims,” respectively). The limitations of the Asserted Claims of the Asserted Patent are satisfied literally by the V15 Accused Products, although SharkNinja reserves the right to contend that any claim element found not to be literally embodied by the V15 Accused Products is present under the doctrine of equivalents because there are no substantial differences for each claim element, and the elements of the V15 Accused Products perform substantially the same function, in substantially the same way, to achieve substantially the same result as the claimed invention. SharkNinja reserves the right to amend these Infringement Contention charts or assert new theories of infringement, including without limitation by amending or asserting literal infringement or the doctrine of equivalents, in light of the Court’s claim construction or subsequent discovery. SharkNinja reserves the right to supplement, modify, or amend the following preliminary claim charts as discovery continues and in accordance with subsequent events in the litigation.

SharkNinja’s decision to assert claims 23-24 of the ’407 Patent, but not other claims is not a concession that the V15 Accused Products do not infringe other unasserted claims.

An inspection of physical samples of the V15 Accused Products, along with reviews of Dyson product literature, demonstrates infringement of each and every claim below but a physical sample is impossible to include in this chart; SharkNinja explicitly reserves the right to rely on physical samples, other photos and videos of same, the boxes and manuals included with the V15 Accused Products in any demonstration of infringement, including any demonstration of the presence of any of the limitations in the chart below. Discovery is just beginning; SharkNinja further explicitly reserves the right and ability to rely on materials yet to be produced by Dyson (or third parties) in order to demonstrate infringement.

SharkNinja reserves the right to rely on the entirety of the material cited in this chart to show infringement. Citations presented for one claim limitation are expressly incorporated by reference into all other limitations for that claim as well as all limitations of all claims on which that claim depends.

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<sup>1</sup> The Dyson V15 Detect™ line and Dyson V15s Submarine™ line are substantively identical in all aspects with respect to SharkNinja’s infringement contentions. Any latent, functional, or mechanical differences between the Dyson V15 Detect™ line and Dyson V15s Submarine™ line do not impact SharkNinja’s infringement contentions. As such, SharkNinja presents the following infringement contentions for both of Dyson’s vacuum lines using exemplary citations to, and photographs of, Dyson’s V15 Detect™ line.

**Exhibit C-1**  
**Claim Chart Comparing the Dyson V15 Detect™ line and Dyson V15s Submarine™ line to U.S. Patent No. 8,607,407**

| <b><u>U.S. Patent No. 8,607,407</u></b>     |                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b><u>Claim Element</u></b>                 | <b><u>Dyson V15 Detect™ line and Dyson V15s Submarine™ line</u></b>                                                                                                                                                                                                                                                                                                                                            |
| 23[Pre.]. A hand vacuum cleaner comprising: | <p>To the extent the preamble is limiting, the Dyson V15 Detect™ line is a hand vacuum cleaner.</p> <p>For example, the below images show a hand vacuum cleaner.</p>  <p><a href="https://www.dyson.com/vacuum-cleaners/cordless/v15/detect-yellow">https://www.dyson.com/vacuum-cleaners/cordless/v15/detect-yellow</a></p> |

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#### Claim Chart Comparing the Dyson V15 Detect™ line and Dyson V15s Submarine™ line to U.S. Patent No. 8,607,407



<https://www.dyson.com/vacuum-cleaners/cordless/v15/detect-yellow>

23[a]. a front end having a front wall and a rear end;

The Dyson V15 Detect™ line includes a front end having a front wall and a rear end.

For example, the below images show a front end having a front wall and a rear end.



<https://www.dyson.com/vacuum-cleaners/cordless/v15/detect-yellow>

**Exhibit C-1**

**Claim Chart Comparing the Dyson V15 Detect™ line and Dyson V15s Submarine™ line to U.S. Patent No. 8,607,407**

|                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                     | <div data-bbox="795 190 1675 782" data-label="Image">A side-view diagram of a cordless stick vacuum. A blue arrow labeled 'Front end' points to the front of the motor unit. A red arrow labeled 'Rear end' points to the back of the motor unit. A purple arrow labeled 'Front wall' points to the front of the dust container. The vacuum has a grey body and a black handle.</div> <div data-bbox="585 808 1692 881" data-label="Text"><p><a href="https://www.dyson.com/content/dam/dyson/maintenance/user-guides/en_US/vacuumcleaners/cordlessstickvacuums/sv22/368340-01.pdf">https://www.dyson.com/content/dam/dyson/maintenance/user-guides/en_US/vacuumcleaners/cordlessstickvacuums/sv22/368340-01.pdf</a> (annotated).</p></div> |
| <div data-bbox="201 922 537 1027" data-label="Text"><p>23[b]. an air flow passage extending from a dirty air inlet to a clean air outlet;</p></div> | <div data-bbox="585 922 1883 1097" data-label="Text"><p>The Dyson V15 Detect™ line includes an air flow passage extending from a dirty air inlet to a clean air outlet.</p><p>For example, the below images show an air flow passage extending from a dirty air inlet to a clean air outlet.</p></div>                                                                                                                                                                                                                                                                                                                                                                                                                                      |

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## Claim Chart Comparing the Dyson V15 Detect™ line and Dyson V15s Submarine™ line to U.S. Patent No. 8,607,407

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                         |  <p><a href="https://www.dyson.com/vacuum-cleaners/cordless/v15/detect-absolute-hepa-gold">https://www.dyson.com/vacuum-cleaners/cordless/v15/detect-absolute-hepa-gold</a> (annotated).</p>                                                                                                                           |
| <p>23[c]. a first cyclone unit positioned in the air flow passage, the first cyclone unit comprising at least one cyclone and at least one dirt collection chamber;</p> | <p>The Dyson V15 Detect™ line includes a first cyclone unit positioned in the air flow passage, the first cyclone unit comprising at least one cyclone and at least one dirt collection chamber.</p> <p>For example, the below images show a first cyclone unit positioned in the air flow passage, the first cyclone unit comprising at least one cyclone and at least one dirt collection chamber.</p> |

# Exhibit C-1

## Claim Chart Comparing the Dyson V15 Detect™ line and Dyson V15s Submarine™ line to U.S. Patent No. 8,607,407

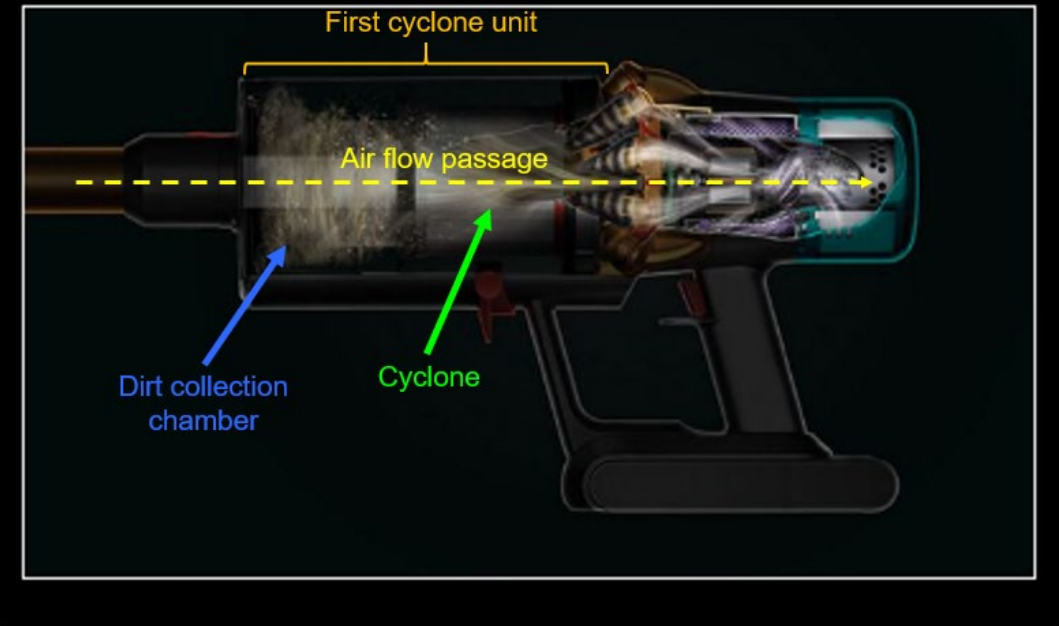
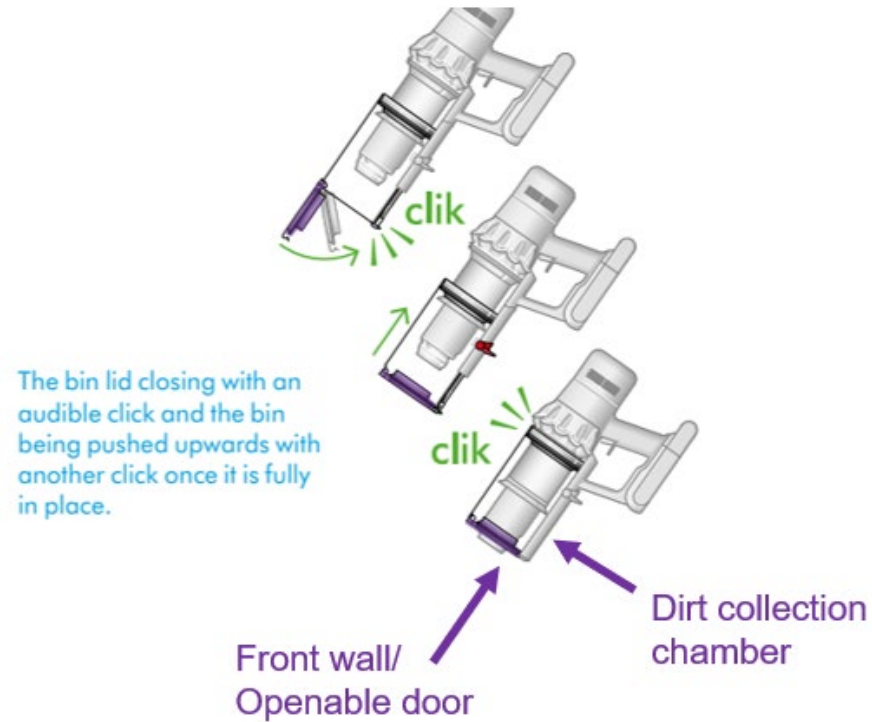
|                                                                                                                      |                                                                                                                                                                                                                                                                                        |
|----------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                      |  <p><a href="https://www.dyson.com/vacuum-cleaners/cordless/v15/detect-absolute-hepa-gold">https://www.dyson.com/vacuum-cleaners/cordless/v15/detect-absolute-hepa-gold</a> (annotated).</p>         |
| <p>23[d]. the dirt collection chamber having an openable door, the front wall comprising the openable door; and,</p> | <p>The Dyson V15 Detect™ line includes a dirt collection chamber having an openable door, the front wall comprising the openable door.</p> <p>For example, the below images show the dirt collection chamber having an openable door, the front wall comprising the openable door.</p> |

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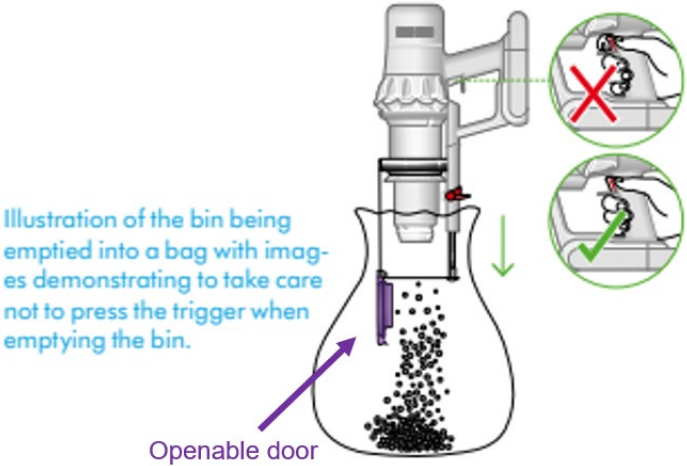
Claim Chart Comparing the Dyson V15 Detect™ line and Dyson V15s Submarine™ line to U.S. Patent No. 8,607,407



[https://www.dyson.com/content/dam/dyson/maintenance/user-guides/en\\_US/vacuumcleaners/cordlessstickvacuums/sv22/447294-01.pdf](https://www.dyson.com/content/dam/dyson/maintenance/user-guides/en_US/vacuumcleaners/cordlessstickvacuums/sv22/447294-01.pdf) (annotated).

### Exhibit C-1

#### Claim Chart Comparing the Dyson V15 Detect™ line and Dyson V15s Submarine™ line to U.S. Patent No. 8,607,407

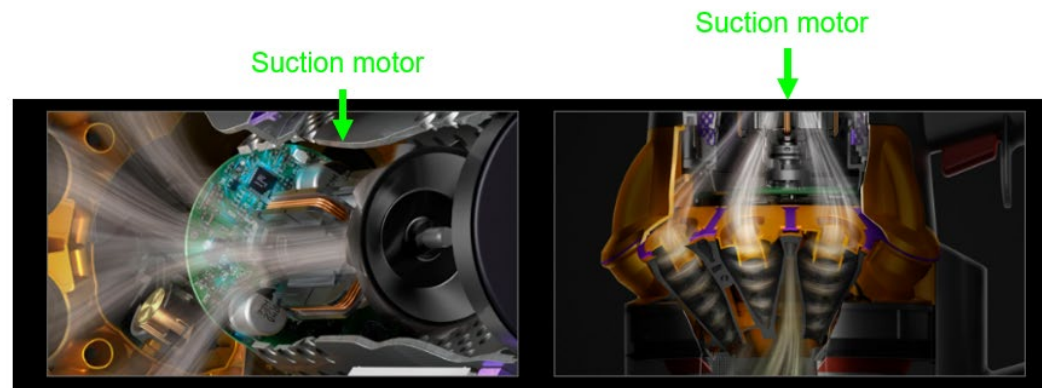
|                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                           |  <p>Illustration of the bin being emptied into a bag with images demonstrating to take care not to press the trigger when emptying the bin.</p> <p>Openable door</p> <p><a href="https://www.dyson.com/content/dam/dyson/maintenance/user-guides/en_US/vacuumcleaners/cordlessstickvacuums/sv22/447294-01.pdf">https://www.dyson.com/content/dam/dyson/maintenance/user-guides/en_US/vacuumcleaners/cordlessstickvacuums/sv22/447294-01.pdf</a> (annotated).</p> |
| 23[e]. a suction motor positioned in the air flow passage | <p>The Dyson V15 Detect™ line includes a suction motor positioned in the air flow passage.</p> <p>For example the below images show a suction motor positioned in the air flow passage.</p> <p>For example, the below images show a suction motor positioned in the air flow passage.</p>                                                                                                                                                                                                                                                          |

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## Claim Chart Comparing the Dyson V15 Detect™ line and Dyson V15s Submarine™ line to U.S. Patent No. 8,607,407



<https://www.dyson.com/vacuum-cleaners/cordless/v15/detect-absolute-hepa-gold> (annotated).



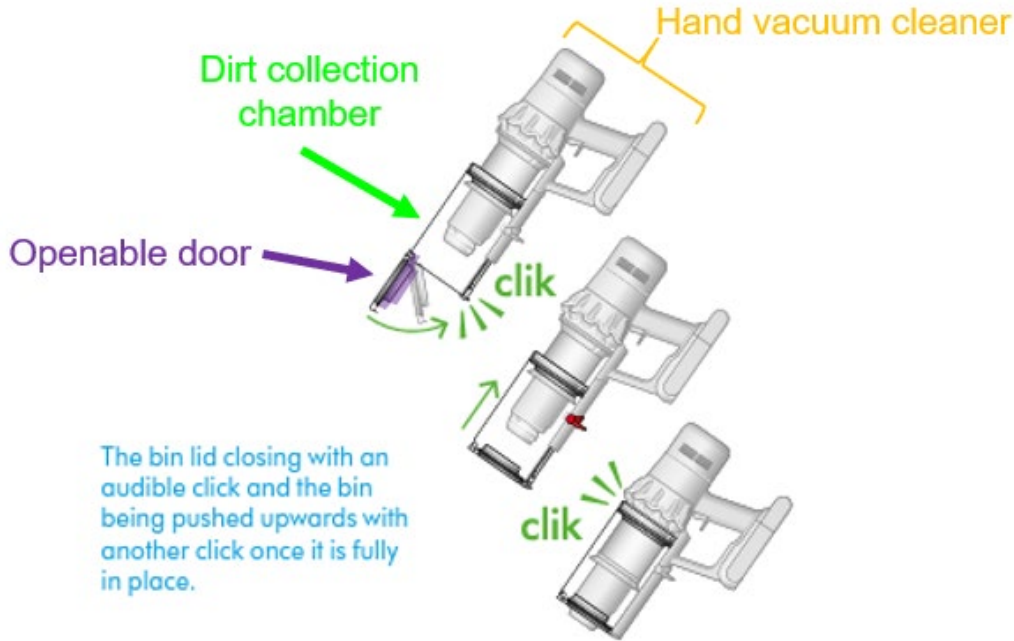
<https://www.dyson.com/vacuum-cleaners/cordless/v15/detect-absolute-hepa-gold> (annotated).

23[f]. wherein the door is openable when the dirt collection chamber is

The Dyson V15 Detect™ line includes a hand vacuum cleaner wherein the door is openable when the dirt collection chamber is mounted to the hand vacuum cleaner.

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## Claim Chart Comparing the Dyson V15 Detect™ line and Dyson V15s Submarine™ line to U.S. Patent No. 8,607,407

|                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>mounted to the hand vacuum cleaner.</p>                    | <p>For example, the below images show a hand vacuum cleaner wherein the door is openable when the dirt collection chamber is mounted to the hand vacuum cleaner.</p>  <p><a href="https://www.dyson.com/content/dam/dyson/maintenance/user-guides/en_US/vacuumcleaners/cordlessstickvacuums/sv22/447294-01.pdf">https://www.dyson.com/content/dam/dyson/maintenance/user-guides/en_US/vacuumcleaners/cordlessstickvacuums/sv22/447294-01.pdf</a> (annotated).</p> |
| <p>24[Pre.]. A hand vacuum cleaner comprising:</p>            | <p>To the extent the preamble is limiting, the Dyson V15 Detect™ line is a hand vacuum cleaner.</p> <p><i>See Claim 23[Pre.].</i></p>                                                                                                                                                                                                                                                                                                                                                                                                               |
| <p>24[a]. a front end having a front wall and a rear end;</p> | <p>The Dyson V15 Detect™ line includes a front end having a front wall and a rear end.</p> <p><i>See Claim 23[a].</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                           |

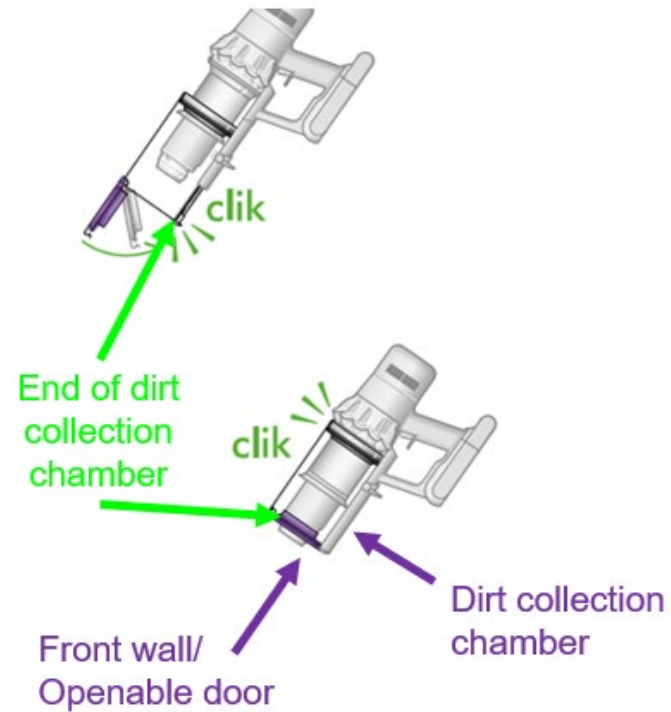
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#### Claim Chart Comparing the Dyson V15 Detect™ line and Dyson V15s Submarine™ line to U.S. Patent No. 8,607,407

|                                                                                                                                                                  |                                                                                                                                                                                                                                                                                  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 24[b]. an air flow passage extending from a dirty air inlet to a clean air outlet;                                                                               | <p>The Dyson V15 Detect™ line includes an air flow passage extending from a dirty air inlet to a clean air outlet.</p> <p><i>See Claim 23[b].</i></p>                                                                                                                            |
| 24[c]. a first cyclone unit positioned in the air flow passage, the first cyclone unit comprising at least one cyclone and at least one dirt collection chamber; | <p>The Dyson V15 Detect™ line includes a first cyclone unit positioned in the air flow passage, the first cyclone unit comprising at least one cyclone and at least one dirt collection chamber.</p> <p><i>See Claim 23[c].</i></p>                                              |
| 24[d]. the dirt collection chamber having an openable door, the front wall comprising the openable door; and,                                                    | <p>The Dyson V15 Detect™ line includes a dirt collection chamber having an openable door, the front wall comprising the openable door.</p> <p><i>See Claim 23[d].</i></p>                                                                                                        |
| 24[e]. a suction motor positioned in the air flow passage                                                                                                        | <p>The Dyson V15 Detect™ line includes a suction motor positioned in the air flow passage.</p> <p><i>See Claim 23[e].</i></p>                                                                                                                                                    |
| 24[f]. wherein the openable door covers an end of the dirt collection chamber.                                                                                   | <p>The Dyson V15 Detect™ line includes a hand vacuum cleaner wherein the openable door covers an end of the dirt collection chamber.</p> <p>For example, the below images show a hand vacuum cleaner wherein the openable door covers an end of the dirt collection chamber.</p> |

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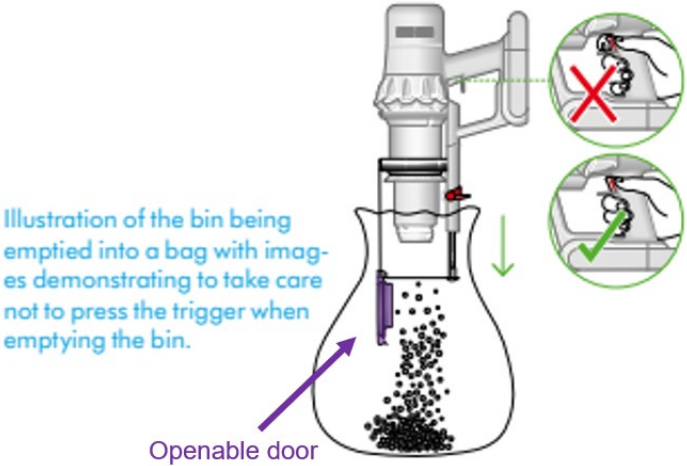
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[https://www.dyson.com/content/dam/dyson/maintenance/user-guides/en\\_US/vacuumcleaners/cordlessstickvacuums/sv22/447294-01.pdf](https://www.dyson.com/content/dam/dyson/maintenance/user-guides/en_US/vacuumcleaners/cordlessstickvacuums/sv22/447294-01.pdf) (annotated).

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**Claim Chart Comparing the Dyson V15 Detect™ line and Dyson V15s Submarine™ line to U.S. Patent No. 8,607,407**

|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  |  <p>Illustration of the bin being emptied into a bag with images demonstrating to take care not to press the trigger when emptying the bin.</p> <p>Openable door</p> <p><a href="https://www.dyson.com/content/dam/dyson/maintenance/user-guides/en_US/vacuumcleaners/cordlessstickvacuums/sv22/447294-01.pdf">https://www.dyson.com/content/dam/dyson/maintenance/user-guides/en_US/vacuumcleaners/cordlessstickvacuums/sv22/447294-01.pdf</a> (annotated).</p> |
|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|