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Defendant and Counterclaim Plaintiff
CamelBak Products, LLC.*

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

TROVE BRANDS, LLC,
Plaintiff,
vs.
CAMELBAK PRODUCTS, LLC,
and VISTA OUTDOOR INC.,
Defendants.

No.: 5:23-cv-4267-PCP

**CAMELBAK PRODUCTS, LLC'S
DISCLOSURE OF ASSERTED CLAIMS
AND INFRINGEMENT CONTENTIONS**

CAMELBAK PRODUCTS, LLC,
Counterclaim Plaintiff,
vs.
TROVE BRANDS, LLC,
Counterclaim Defendant.

No.: 5:23-cv-4267-PCP

-1-

CAMELBAK PRODUCTS, LLC'S DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT
CONTENTIONS

Pursuant to the Court's Case Management Order (DN 25) and N.D. Cal. Patent L.R. 3.1, Counterclaim Plaintiff CamelBak Products, LLC ("CamelBak") hereby discloses its preliminary assertion of patent claims and infringement contentions to Plaintiff and Counterclaim Defendant Trove Brands, LLC ("Trove").

I. PRELIMINARY STATEMENT

CamelBak makes these preliminary infringement contentions with only limited discovery in this action yet from Trove. For example, these contentions are made without knowledge of, or with limited knowledge of, Trove's confidential documents, designs, and schematics. CamelBak expressly reserves the right to amend or modify its identification of asserted claims, accused products and/or infringement contentions, if necessary, as permitted by the Court, and/or based on additional information obtained through formal discovery or other means. CamelBak further reserves the right to seek changes to the Court's Case Management Order or other scheduling orders in light of Trove's failure to produce in a timely manner sufficient documents or other discovery on which CamelBak might base its infringement contentions.

II. P.L.R. 3-1 DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS

A. P.L.R. 3-1(a): Disclosure of Asserted Claims

Based on the information CamelBak currently has available to it, CamelBak discloses the following claims from each Asserted Patent that it contends are infringed by Trove (the "Asserted Claim(s)"):

Asserted Patent	Infringed Claims	Priority Date of Claims
8,905,252 ("the '252 Patent")	5, 6, 7, 19	Mar. 13, 2013
8,905,252 ("the '252 Patent")	16, 17, 18	July 29, 2013
9,463,911 ("the '911 patent")	14, 15, 16, 19, 37, 38	Apr. 11, 2005

Asserted Patent	Infringed Claims	Priority Date of Claims
10,676,255 (“the ’255 patent”)	1, 3, 4, 5, 11, 13, 19	Apr. 11, 2005
10,676,255 (“the ’255 patent”)	9	Dec. 20, 2005
10,676,255 (“the ’255 patent”)	12	Aug. 8, 2005
11,242,178 (the “’178 Patent”)	1, 2, 4, 5, 6, 11, 12, 14, 15, 16, 17, 20, 21, 22	Apr. 11, 2005
11,242,178 (the “’178 Patent”)	10	Dec. 20, 2005
9,782,028 (“the ’028 patent”)	1, 2, 5, 6, 8, 9, 15, 16, 21	Jan. 21, 2009
10,165,879 (“the ’879 patent”)	1, 3, 5, 6, 7, 8, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19	Jan. 21, 2009
11,684,187 (“the ’187 patent”)	1, 3, 4, 5, 6, 7, 8, 9, 11, 12, 13, 14, 15, 16, 17, 19	Jan. 21, 2009
11,851,250 (“the ’250 patent”)	1, 2, 4, 5, 6	Apr. 11, 2005

CamelBak contends that Trove infringes each of the above-identified asserted claims directly under 35 U.S.C. § 271(a) and indirectly under 35 U.S.C. § 271(b) (inducement) and 35 U.S.C. § 271(c) (contributory infringement).

B. P.L.R. 3-1(b): Disclosure of Accused Products

The accused products include, without limitation, the following: Trove’s Owala FreeSip, Owala Flip Kids, and Owala Flip families of water bottle products, including all component parts such as replacement lids, replacement bottles, Bottle Boot product, and other replacement components that can be combined to form an infringing product (collectively, the “Accused Products”). Images of representative samples of the lids of the Accused Products are provided below. Any Trove products that include the same or substantially the same lid structure, regardless of any differences in coloring scheme or changes to marketing name or model number, should be considered as the same Accused Product.

1 **1. FreeSip**



7 **2. Flip**



12 **3. Flip Kids**



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20 As set forth in the table below, for each Asserted Claim of each Asserted Patent, CamelBak
21 identifies the Accused Products of which it currently is aware. For each Accused Product identified
22 below, CamelBak's contentions apply to the Accused Product and any other similar past, present, or
23 future products, as well as products incorporating the Accused Product or other products with the
24 same or substantially similar features.

25 This identification of Accused Products is based upon CamelBak's investigation to date.
26
27 CamelBak reserves the right to add, delete, substitute or otherwise amend this list of Accused
28

Products based on discovery, the Court's claim construction, or other circumstances, in a manner consistent with the Federal Rules of Civil Procedure and the Court's rules, including the Patent Local Rules.

Asserted Patent	Infringed Claims	Accused Product	Chart
The '252 Patent	5, 6, 7, 16, 17, 18, 19	FreeSip	Ex. A-1
The '911 Patent	14, 15, 16, 19, 37, 38	Flip Kids	Ex. B-1
The '255 Patent	1, 3, 4, 5, 9, 11, 12, 13, 19	Flip Kids	Ex. C-1
The '178 Patent	1, 2, 4, 5, 6, 10, 11, 12, 14, 15, 16, 17, 20, 21, 22	Flip Kids	Ex. D-1
The '178 Patent	11, 12, 14, 15, 16, 17, 20, 22	Flip	Ex. D-2
The '028 Patent	1, 2, 5, 6, 8, 9, 15, 16, 21	Flip Kids	Ex. E-1
The '879 Patent	1, 3, 5, 6, 7, 8, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19	Flip Kids	Ex. F-1
The '879 Patent	1, 3, 11, 12, 13, 14, 15, 16, 17, 18, 19	Flip	Ex. F-2
The '187 Patent	1, 3, 4, 5, 6, 7, 8, 9, 11, 12, 13, 14, 15, 16, 17, 19	Flip Kids	Ex. G-1
The '187 Patent	1, 3, 4, 19	Flip	Ex. G-2
The '250 Patent	1, 2, 4, 5, 6	Flip Kids	Ex. H-1
The '250 Patent	1, 2, 4, 5, 6	Flip	Ex. H-2

By making this identification of Accused Products pursuant to the Court's Case Management Order and Patent Local Rules, CamelBak does not waive or in any way limit its right to assert infringement of the Asserted Patents against additional Trove's products with similar functions and operations of which CamelBak may become aware during discovery in this litigation. CamelBak

1 reserves the right to supplement or modify its disclosures and contentions as a matter of right, as the
2 Court may permit, and/or in light of further discovery and investigation.

3 **C. P.L.R. 3-1(c): Claim Charts**

4 Please see attached Exhibits A1, B1, C1, D1-D2, E1, F1-F2, G1-G2, and H1-H2 for charts
5 identifying specifically where and how each element of each Asserted Claim is found within each
6 Accused Product. CamelBak reserves the right to supplement or modify these disclosures and claim
7 charts to account for alternative proposed claim constructions and/or any claim construction order
8 that may be issued in this matter. Also, CamelBak reserves the right to supplement or modify its
9 disclosures and contentions as the Court may permit, and/or in light of further discovery and
10 investigation.

11 **D. P.L.R. 3-1(d): Claims of Indirect Infringement**

12 Trove has directly infringed each asserted claim by, without authority, making, using, selling,
13 offering for sale, and/or importing into the United States the Accused Products.

14 Trove has actively, knowingly, and intentionally induced, and continues to actively,
15 knowingly, and intentionally induce, infringement of the Asserted Patents by making, using, offering
16 for sale, importing, and/or selling the Accused Products, all with knowledge of the Asserted Patents
17 and their claims; with knowledge that its customers and end users will use, market, sell, offer to sell,
18 and/or import the Accused Products; and with the knowledge and the specific intent to encourage
19 and facilitate those infringing sales and uses of those systems through the creation and dissemination
20 of promotional and marketing materials, instructional materials, product manuals, and/or technical
21 materials.

22 Trove has also contributed to the infringement by others, including the end users of the
23 Accused Products, and continues to contribute to infringement by others, by selling, offering to sell,
24 and/or importing components of the Accused Products (e.g., stand-alone lids) into the United States,
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1 knowing that those components constitute a material part of the inventions of the Asserted Patents,
2 knowing those components to be especially made or adapted for use in an infringement of the
3 Asserted Patents, and knowing that those components are not staple articles or commodities of
4 commerce suitable for substantial non-infringing use.

5
6 **E. P.L.R. 3-1(e): Claim Elements Literally Present and/or Present Under the
Doctrine of Equivalents**

7 CamelBak alleges that each element of the Asserted Claims is found literally in the Accused
8 Products.

9 CamelBak served on Trove an interrogatory seeking Trove's contentions on non-
10 infringement (Interrogatory No. 1). Trove objected to this interrogatory as premature and thus far has
11 declined to provide any substantive contentions on non-infringement. To the extent Trove contends
12 in the future that any claim element of any Asserted Claim is not literally present in any Accused
13 Product, CamelBak reserves the right to respond to any such contention by explaining why any such
14 claim element would nonetheless be present under the doctrine of equivalents.

15
16 These assertions are based upon CamelBak's investigation to date. CamelBak reserves the
17 right to add, delete, substitute or otherwise amend these infringement allegations based on discovery,
18 the Court's claim construction, or other circumstances, in a manner consistent with the Federal Rules
19 of Civil Procedure and the Court's rules, including the Local Patent Rules.

20
21 **F. P.L.R. 3-1(f): Priority Date**

22 The priority date to which each Asserted Claim of each Asserted Patent is entitled is
23 provided above in Section II.A.

24 **G. P.L.R. 3-1(g): Practicing Products**

25 CamelBak identifies the following practicing products:
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27
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Patent	Claims	CamelBak Practicing Product
The '252 Patent	Practices at least claim 5, 19	CHUTE CHUTE MAG
The '911 Patent	Practices at least claim 14, 37	BETTER BOTTLE EDDY BOTTLE EDDY + BOTTLE EDDY KIDS BOTTLE EDDY+ KIDS BOTTLE KIDS BETTER BOTTLE GROOVE BOTTLE
The '255 Patent	Practices at least claim 1	BETTER BOTTLE EDDY BOTTLE EDDY + BOTTLE EDDY KIDS BOTTLE EDDY+ KIDS BOTTLE KIDS BETTER BOTTLE GROOVE BOTTLE
The '178 Patent	Practices at least claim 1, 11	BETTER BOTTLE EDDY BOTTLE EDDY + BOTTLE EDDY KIDS BOTTLE EDDY+ KIDS BOTTLE KIDS BETTER BOTTLE GROOVE BOTTLE
The '028 Patent	Practices at least claim 1	KIDS BETTER BOTTLE EDDY KIDS BOTTLE EDDY+ KIDS BOTTLE
The '879 Patent	Practices at least claim 1	KIDS BETTER BOTTLE EDDY KIDS BOTTLE EDDY+ KIDS BOTTLE
The '187 Patent	Practices at least claim 1	BETTER BOTTLE EDDY BOTTLE EDDY + BOTTLE EDDY KIDS BOTTLE EDDY+ KIDS BOTTLE KIDS BETTER BOTTLE GROOVE BOTTLE

1 2 3 4 5 6	The '250 Patent	Practices at least claim 1	BETTER BOTTLE EDDY BOTTLE EDDY + BOTTLE EDDY KIDS BOTTLE EDDY+ KIDS BOTTLE KIDS BETTER BOTTLE GROOVE BOTTLE
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H. P.L.R. 3-1(h): Timing of Infringement and Damages Period

Discovery into the timing of the point of first infringement and sales of the Accused Products is ongoing. Pursuant to 35 U.S.C. § 286, CamelBak identifies a damages period beginning on August 21, 2017. In any event, CamelBak provided actual notice to Trove of its infringement in a letter dated June 21, 2023.

I. P.L.R. 3-1(i): Basis for Claim of Willful Infringement

Trove's acts of infringement of the Asserted Patents have been willful and intentional under the standard of *Halo Elecs., Inc. v. Pulse Elecs., Inc.*, 136 S. Ct. 1923 (2016). CamelBak provided written notice to Trove of the '252, '911, '255, '178, and '250 Asserted Patents on June 21, 2023 and written notice of other Asserted Patents thereafter. Moreover, CamelBak maintains a virtual patent marking webpage: <https://www.camelbak.com/legal/patents/patents.html>. Accordingly, since at least June 21, 2023, Trove has willfully infringed the Asserted Patents by refusing to take a license and continuing the infringement detailed in the attached charts.

III. P.L.R. 3-2 DOCUMENT PRODUCTION ACCOMPANYING DISCLOSURE

Pursuant to P.L.R. 3-2, CamelBak is producing the following documents:

A. P.L.R. 3-2(a): Documents (e.g., contracts, purchase orders, invoices, advertisements, marketing materials, offer letters, beta site testing agreements, and third party or joint development agreements) sufficient to evidence each discussion with, disclosure to, or other manner of providing to a third party, or sale of or offer to sell, or any public use of, the claimed invention prior to the date of application for the patent in suit. A party's production of a document as required herein shall not constitute an admission that such document evidences or is prior art under 35 U.S.C. § 102;

1 After a diligent search, CamelBak has not identified any documents that may be responsive
2 to P.L.R. 3-2(a).

3 **B. P.L.R. 3-2(b): All documents evidencing the conception, reduction to practice,**
4 **design, and development of each claimed invention, which were created on or**
5 **before the date of application for the patent in suit or the priority date identified**
6 **pursuant to Patent L.R. 3-1(f), whichever is earlier;**

7 CamelBak is producing documents responsive to P.L.R. 3-2(b) at CB_0000001-
8 CB_0003788, CB_0003810-CB_0003851, CB_0003899-CB_0009736, CB_0009739-CB_0009740,
9 CB_0009743, CB_0009745, CB_0009751, CB_0009752, CB_0009770-CB_0009782,
10 CB_FH_0000001-CB_FH_0002607.

11 **C. P.L.R. 3-2(c): A copy of the file history for each patent in suit;**

12 CamelBak is producing documents responsive to P.L.R. 3-2(c) at CB_FH_0000001-
13 CB_FH_0002607.

14 **D. P.L.R. 3-2(d): All documents evidencing ownership of the patent rights by the**
15 **party asserting patent infringement;**

16 CamelBak is producing documents responsive to P.L.R. 3-2(d) at CB_0009301-
17 CB_0009736.

18 **E. P.L.R. 3-2(e): If a party identifies instrumentalities pursuant to Patent L.R. 3-**
19 **1(g), documents sufficient to show the operation of any aspects or elements of**
20 **such instrumentalities the patent claimant relies upon as embodying any**
21 **asserted claims;**

22 As set forth above, CamelBak identifies the BETTER BOTTLE, EDDY BOTTLE, EDDY +
23 BOTTLE, EDDY KIDS BOTTLE, EDDY+ KIDS BOTTLE, KIDS BETTER BOTTLE, GROOVE
24 BOTTLE, CHUTE BOTTLE, and CHUTE MAG as practicing claims of the Asserted Patents
25 (collectively the "Practicing Products"). CamelBak intends to rely on physical samples of these
26 products to show operation of any aspects or elements of these products. These Practicing Products
27 are or were widely available for purchase by Trove. To the extent Trove cannot purchase samples,
28

1 CamelBak hereby agrees to make samples of the Practicing Products available for inspection at a
2 time and location to be agreed upon by the parties.

3 In addition, CamelBak is producing documents responsive to P.L.R. 3-2(e) at CB_0003789-
4 CB_0003809, CB_0003823-CB_0003847, CB_0003850, CB_0003856-CB_0003864, CB_0003900,
5 CB_0003904-CB_0003906, CB_0003909, CB_0009737-CB_0009769.
6

7 **F. P.L.R. 3-2(f): All agreements, including licenses, transferring an interest in any
8 patent-in-suit;**

9 CamelBak is producing documents responsive to P.L.R. 3-2(f) at CB_0009783-CB_0009797,
10 CB_0009809-CB_0009813, CB_0009817-CB_0009829, CB_0009846-CB_0009857, CB_0009883-
11 CB_0009891, CB_0009919-CB_0009932.

12 **G. P.L.R. 3-2(g): All agreements that may be related to the accused instrumentality
13 or may be comparable to a license that would result from a hypothetical
14 reasonable royalty negotiation;**

15 CamelBak is producing documents responsive to P.L.R. 3-2(g) at CB_0009783-
16 CB_0009932.

17 **H. P.L.R. 3-2(h): All agreements that otherwise may be used to support the party
18 asserting infringement's damages case;**

19 CamelBak is producing documents responsive to P.L.R. 3-2(h) at CB_0009783-
20 CB_0009932.

21 **I. P.L.R. 3-2(i): If a party identifies instrumentalities pursuant to Patent L.R. 3-
22 1(g), documents sufficient to show marking of such embodying accused
23 instrumentalities and if it wants to preserve the right to recover lost profits
24 based on such products, sales, revenues, costs and profits of such embodying
25 accused instrumentalities;**

26 Pursuant to 35 U.S.C. § 287(a), CamelBak maintains a list of products covered by its patents
27 at <https://www.camelbak.com/patents>. CamelBak also incorporates by reference its response in
28 Section III.E, *supra*.

In addition, CamelBak is producing documents responsive to P.L.R. 3-2(i) at CB_0003852-
CB_0003855, CB_0003865-CB_0003898.

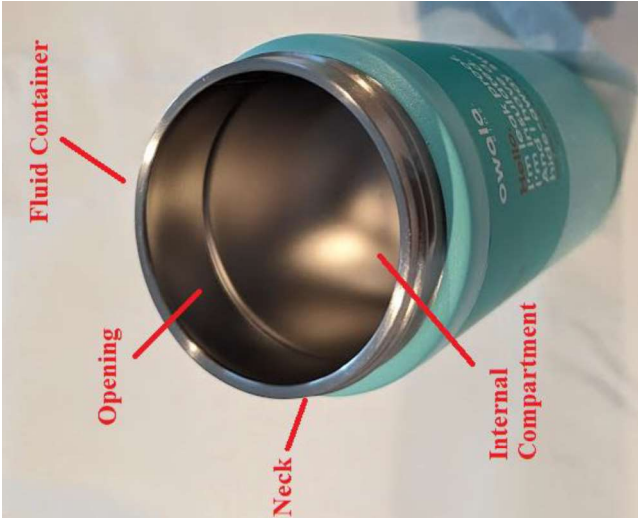
DATE: December 21, 2023

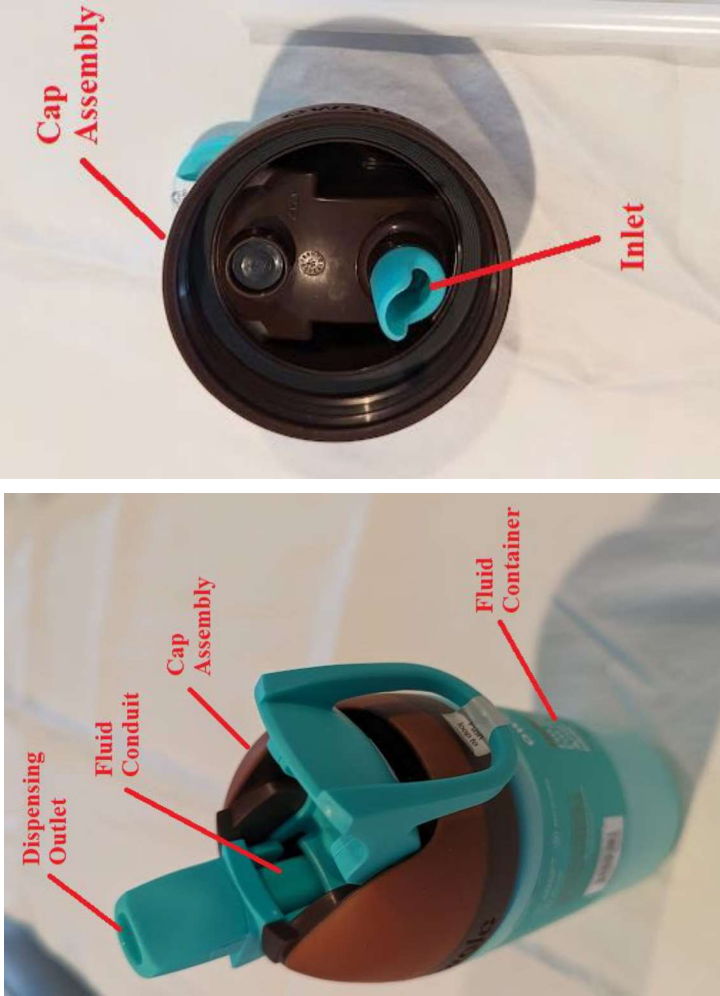
*Attorneys for Defendant Vista Outdoor Inc. and
Defendant and Counterclaim Plaintiff CamelBak
Products, LLC*

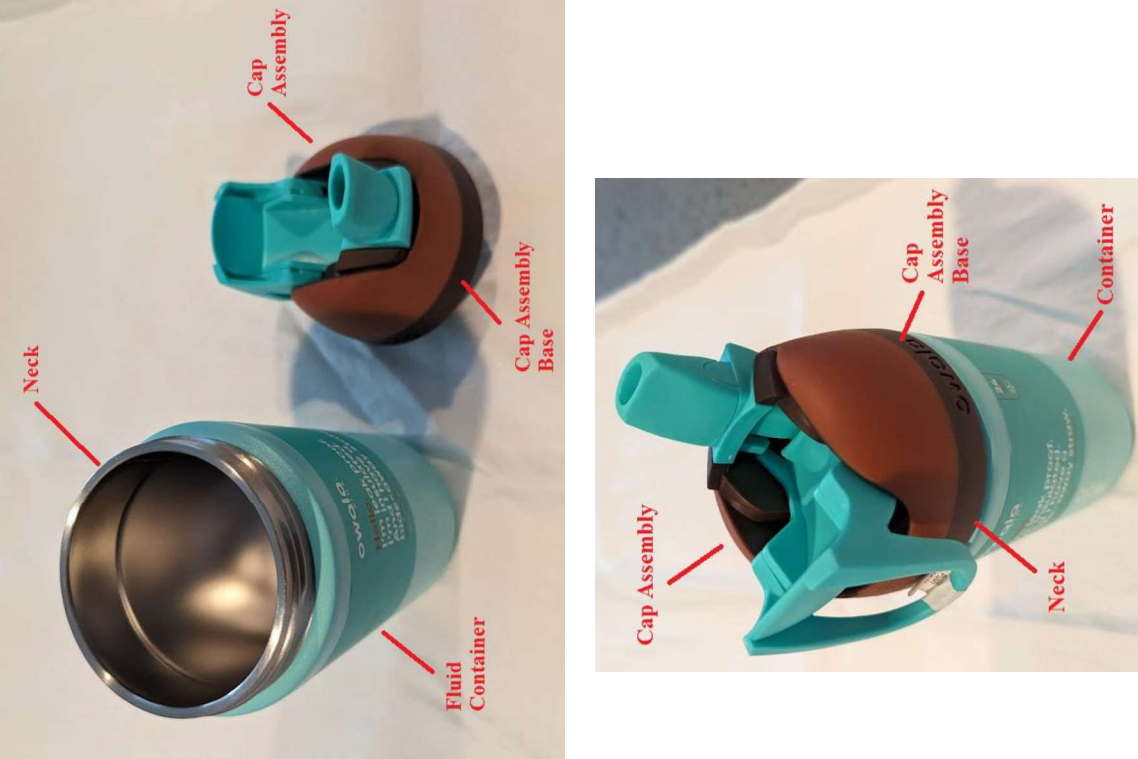
EXHIBIT C-1

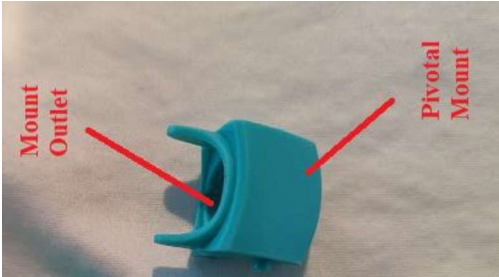
Infringement Claim Chart of U.S. Patent No.
10,676,255 ('255 Patent), Issued June 9,
2020, by Owala Flip Kids. (Reexamination
certificate issued November 20, 2023).

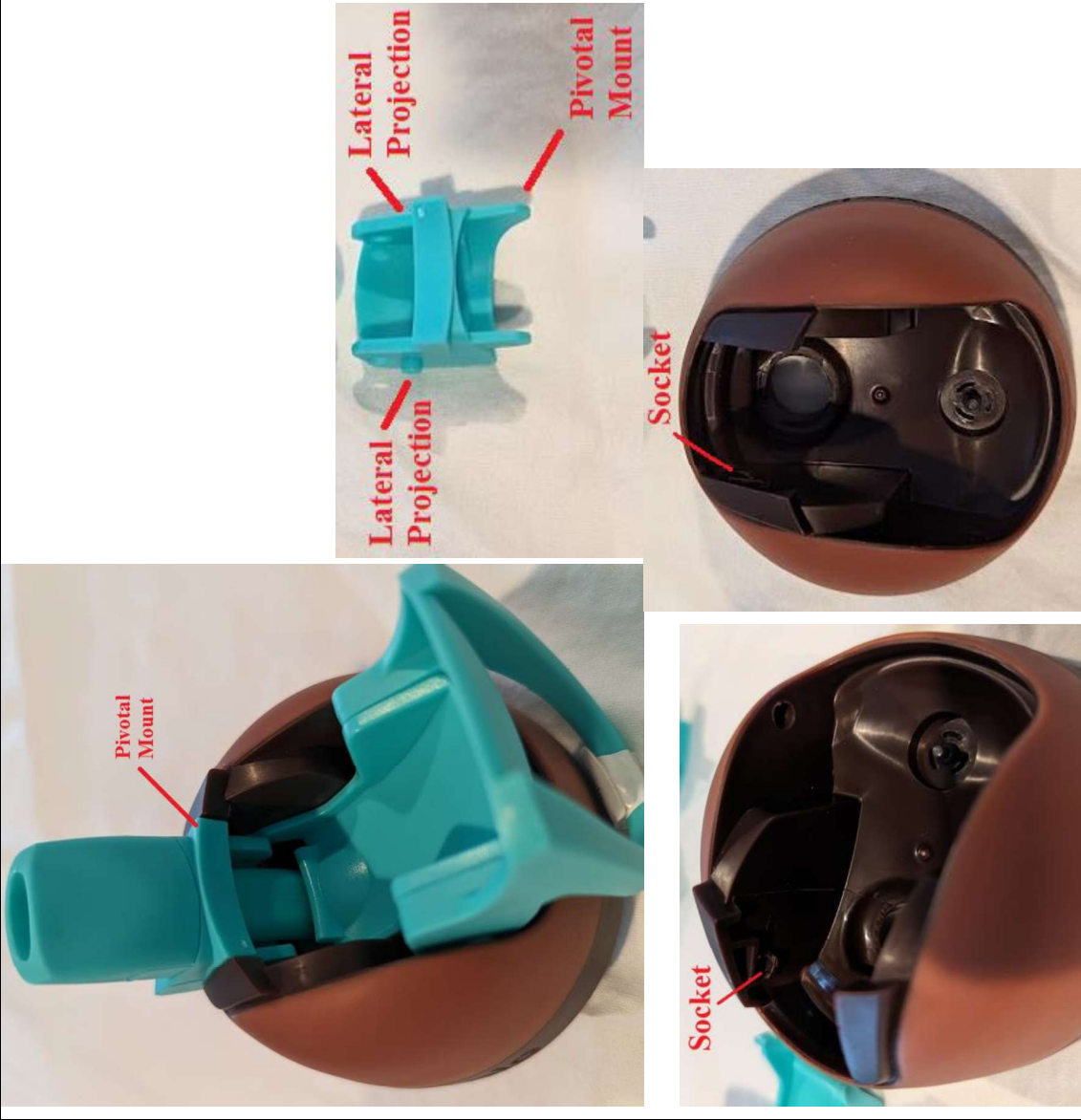
This claim chart provides exemplary support based on currently available information. As discovery has just commenced and the claims have not yet been construed, CamelBak reserves the right to supplement and/or amend these positions in accordance with the Federal Rules of Civil Procedures and any applicable local rules.

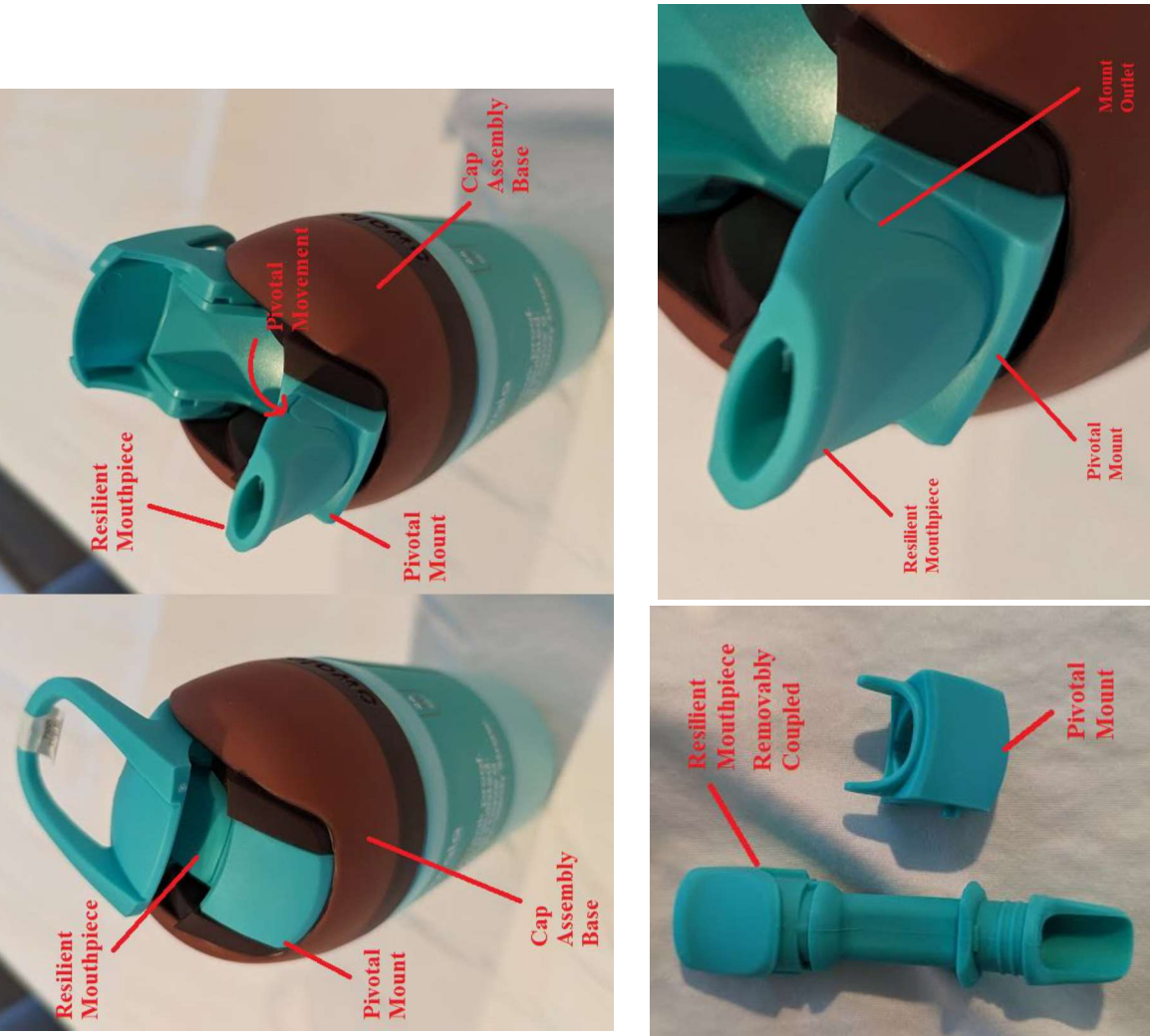
Claim	Claim Language	Mapping to Owala Flip Kids
1(pre)	A drink container, comprising:	
1(a)	a fluid container having a neck with an opening and having an internal compartment sized to hold a volume of potable drink fluid;	

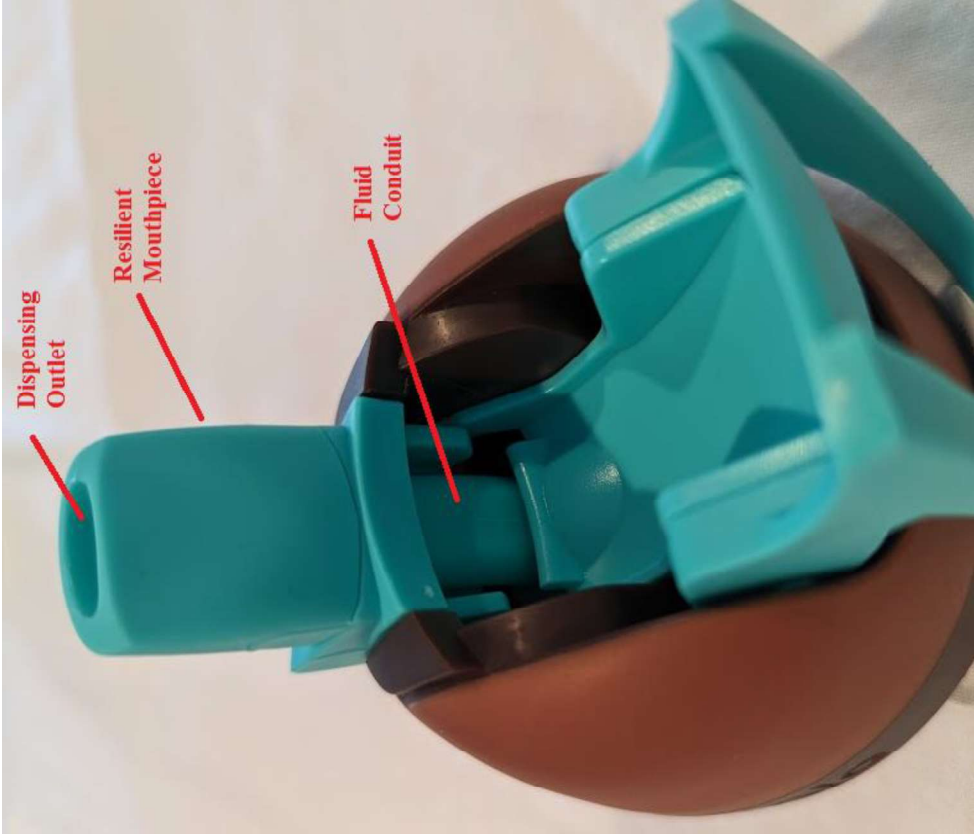
Claim	Claim Language	Mapping to Owala Flip Kids
1(b)	a cap assembly removably coupled to the fluid container to cover the opening, wherein the cap assembly defines a fluid conduit for drink fluid to flow from the fluid container and through the cap assembly to a user, wherein the fluid conduit includes an inlet through which drink fluid from the fluid container may enter the fluid conduit, and a dispensing outlet through which drink fluid in the fluid conduit may be dispensed from the cap assembly to a user, and further wherein the cap assembly comprises:	
1(c)	a cap assembly base removably coupled to the neck of the fluid container, wherein the cap assembly base is configured to be selectively and repeatedly decoupled from and re-coupled to the neck of the fluid container;	

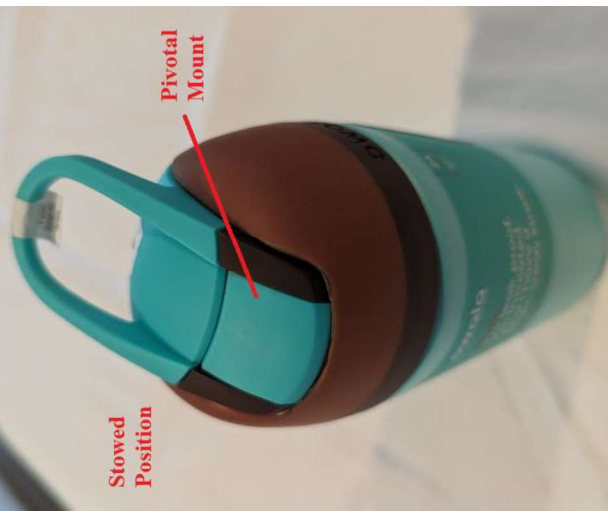
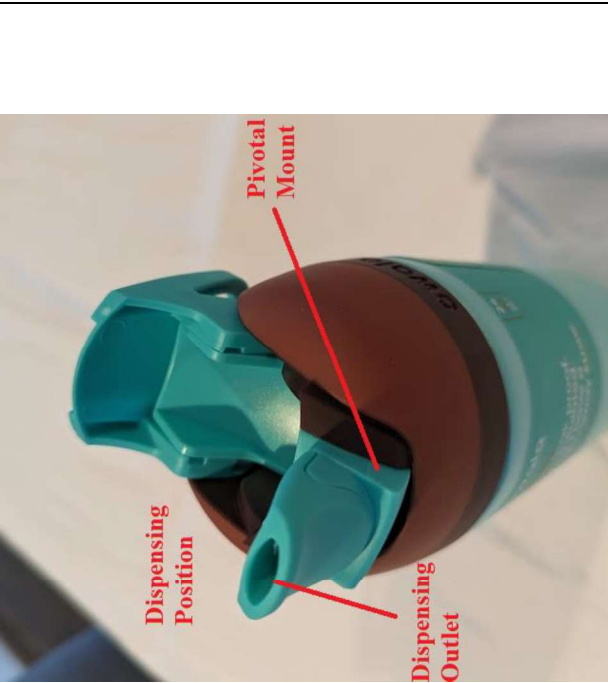
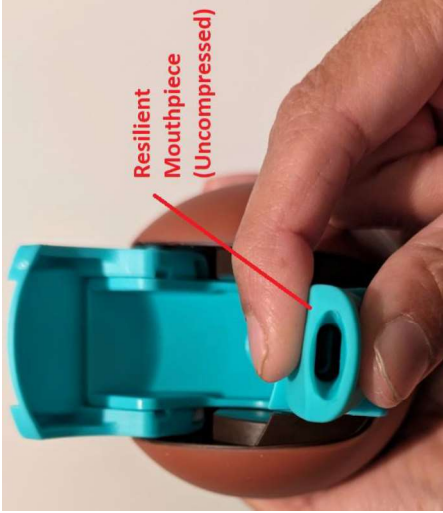
Claim	Claim Language	Mapping to Owala Flip Kids
		

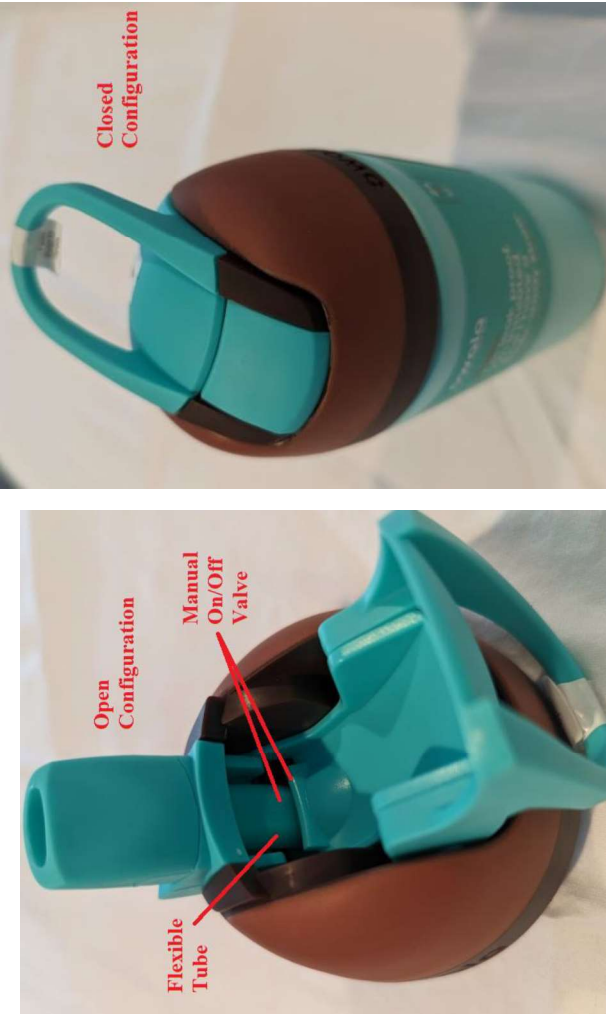
Claim	Claim Language	Mapping to Owala Flip Kids
1(d)	a pivotal mount coupled to the cap assembly base for pivotal movement relative to the cap assembly base, the pivotal mount comprising a mount outlet	 

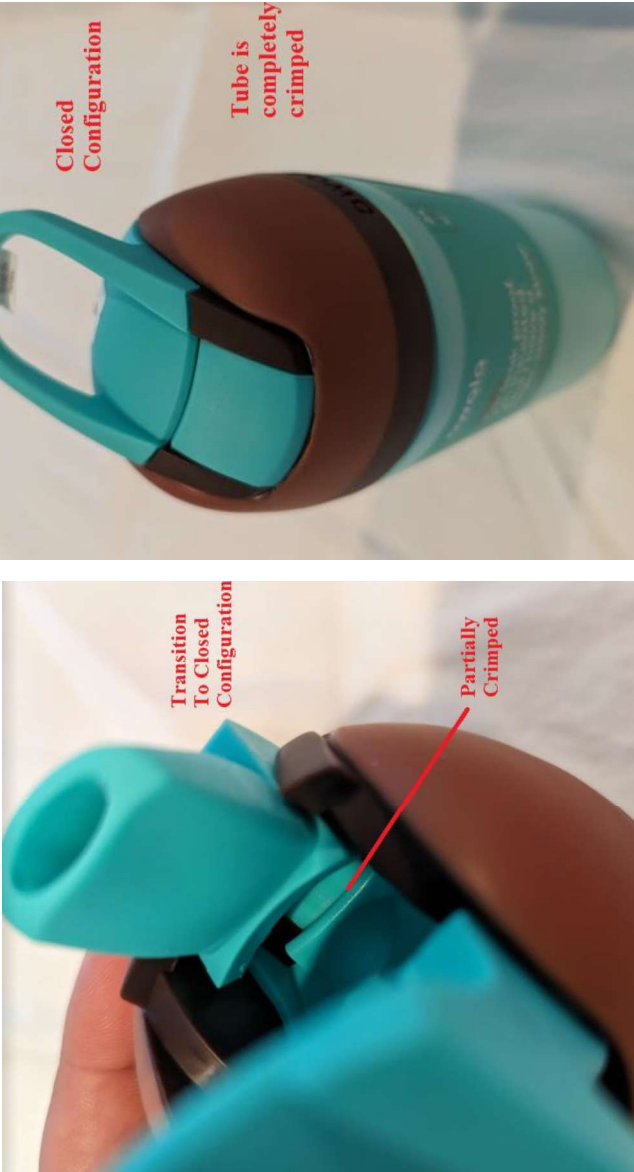
Claim	Claim Language	Mapping to Owala Flip Kids
1(e)	wherein the pivotal mount includes a pair of lateral projections, wherein the cap assembly base defines a pair of sockets into which the pair of lateral projections extend;	

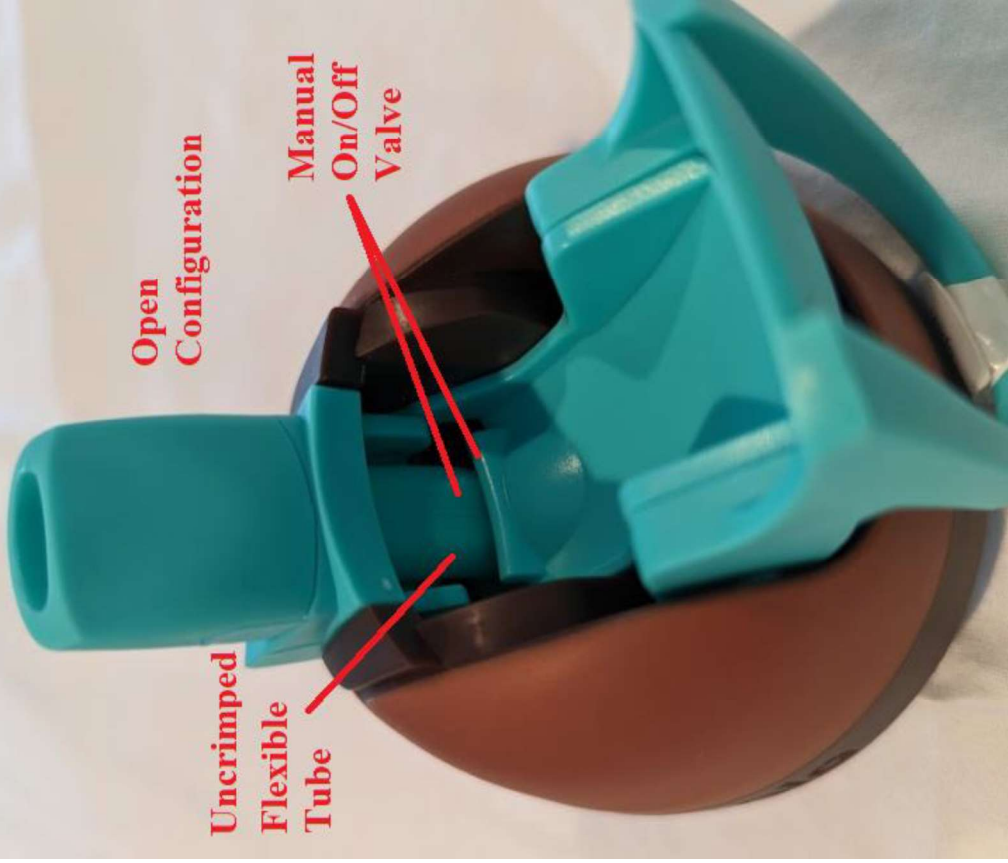
Claim	Claim Language	Mapping to Owala Flip Kids
1(f)	a resilient mouthpiece engaged with the mount outlet and removably coupled to the pivotal mount with the pivotal movement relative to the cap assembly base, wherein the resilient mouthpiece is pivotal about an axis defined by the pair of lateral projections as the pair of lateral projections rotate within the pair of sockets;	

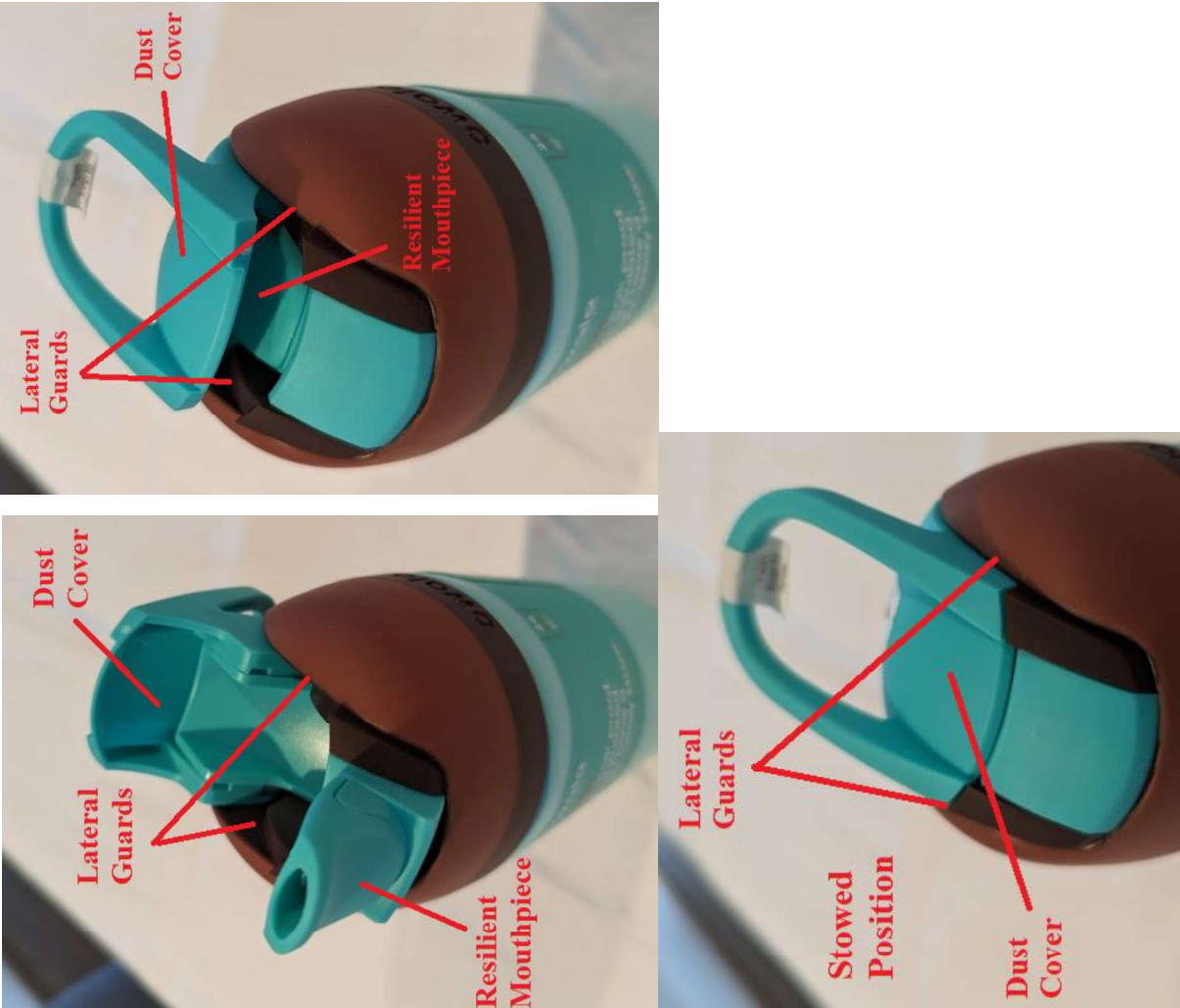
Claim	Claim Language	Mapping to Owala Flip Kids
1(g)	wherein the resilient mouthpiece defines a portion of the fluid conduit, including the dispensing outlet;	
1(h)	wherein the resilient mouthpiece and the pivotal mount are configured to be selectively pivoted between	

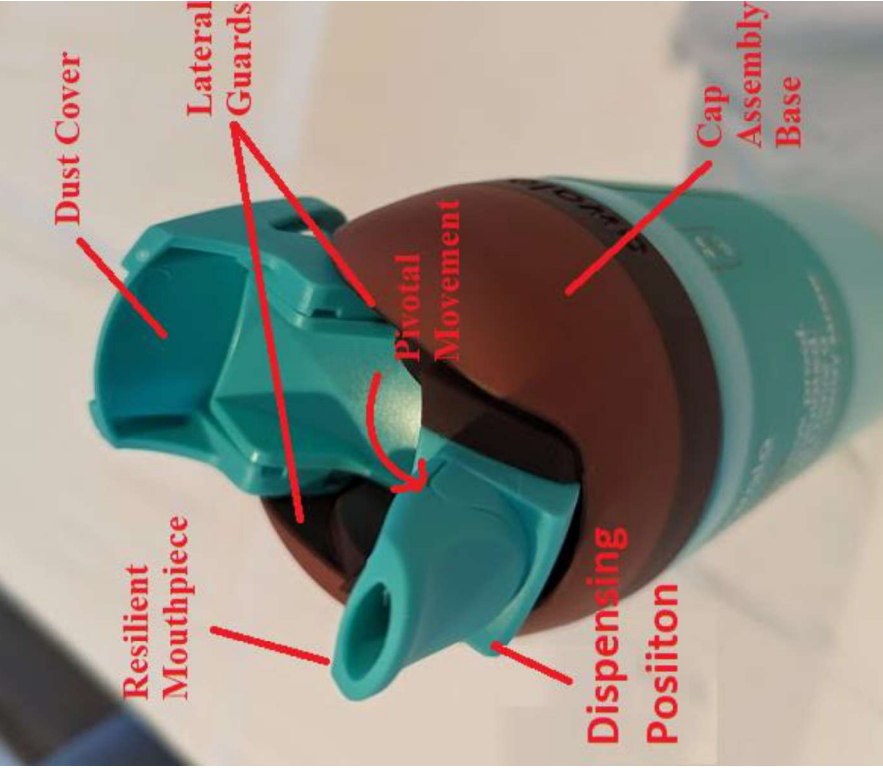
Claim	Claim Language	Mapping to Owala Flip Kids	
	a stowed position and a dispensing position, and further in the dispensing position, the dispensed outlet is positioned further away from the cap assembly base than when the resilient mouthpiece and the pivotal mount are in the stowed position;	 The image shows the Owala Flip Kids in its stowed position. A red label 'Stowed Position' points to the teal cap. Another red label 'Pivotal Mount' points to the hinge mechanism on the side of the cap.	 The image shows the Owala Flip Kids in its dispensing position. A red label 'Dispensing Position' points to the teal cap. Another red label 'Pivotal Mount' points to the hinge mechanism. A third red label 'Dispensing Outlet' points to the opening at the end of the spout.
1(i)	wherein the resilient mouthpiece is adapted to resiliently compress responsive to compressive forces applied to the resilient mouthpiece by a user's teeth; and	 The image shows a close-up of the teal resilient mouthpiece in its uncompressed state. A red label 'Resilient Mouthpiece (Uncompressed)' points to the mouthpiece.	 The image shows a close-up of the teal resilient mouthpiece being compressed by a finger. A red label 'Resilient Mouthpiece (Compressed)' points to the mouthpiece.

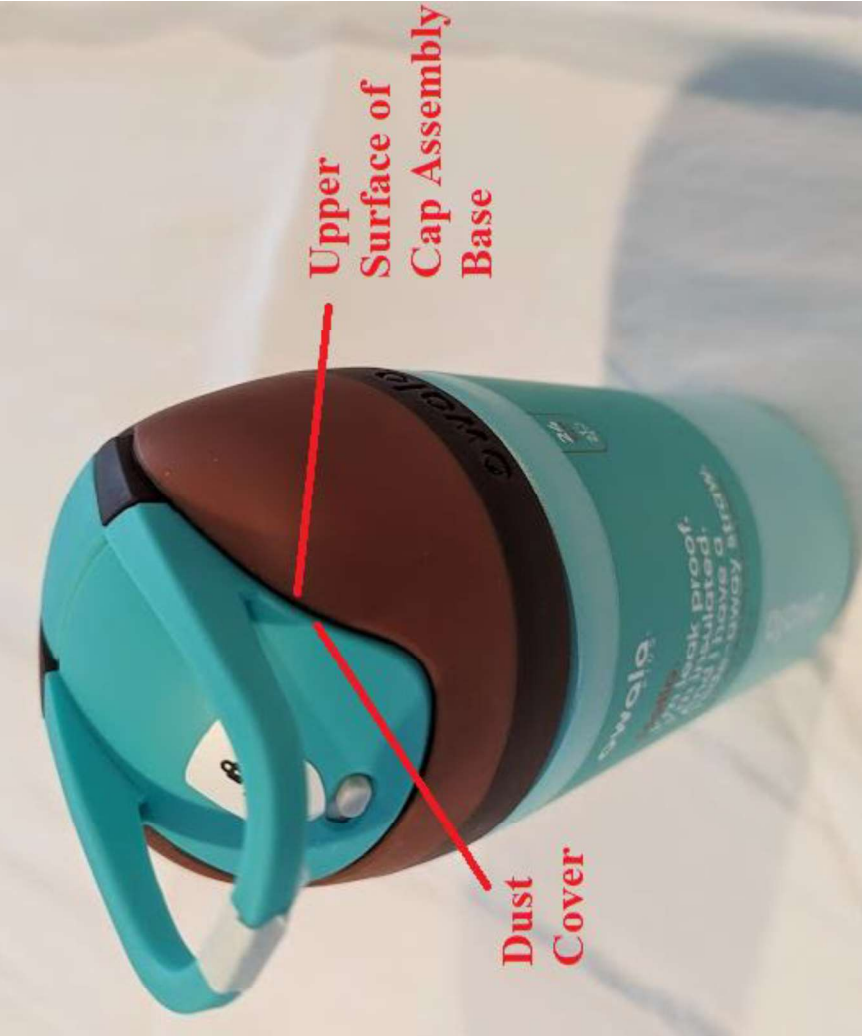
Claim	Claim Language	Mapping to Owala Flip Kids
1(j)	a manual on/off valve having a closed configuration, in which the manual on/off valve obstructs the fluid conduit to restrict drink fluid from flowing between the inlet and the dispensing outlet, and an open configuration, in which the manual on/off valve permits drink fluid to flow through the fluid conduit from the inlet to the dispensing outlet; wherein the manual on/off valve includes a flexible tube that defines a portion of the fluid conduit;	

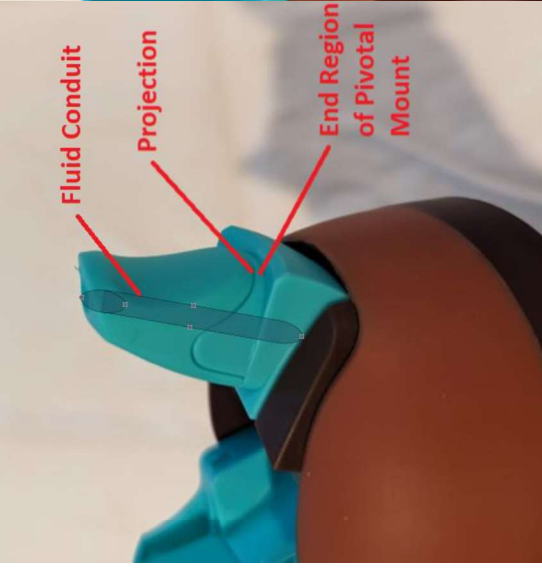
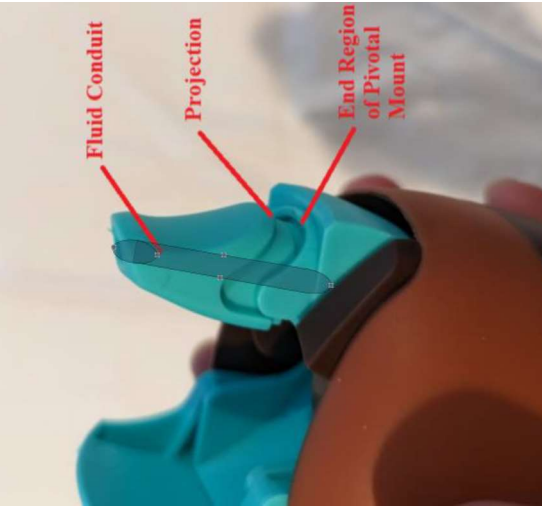
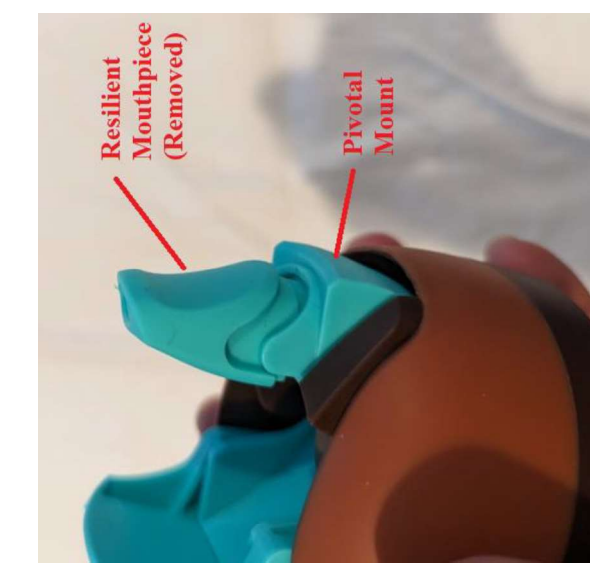
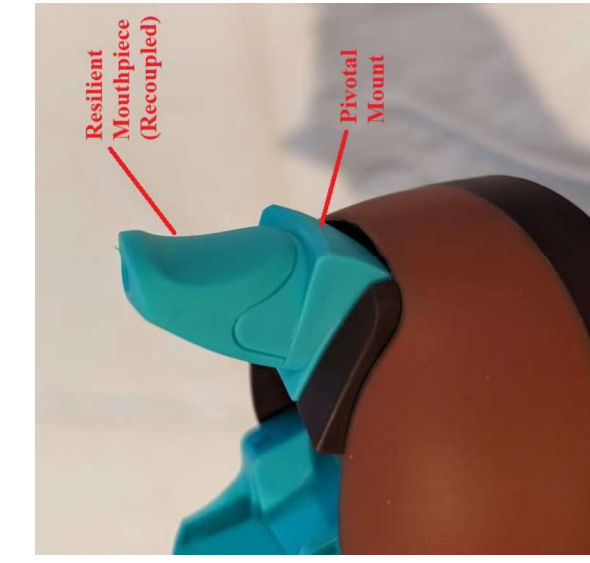
Claim	Claim Language	Mapping to Owala Flip Kids
1(k)	wherein when the manual on/off valve is in the closed configuration, the tube is crimped to obstruct the flow of drink fluid through the fluid conduit; and	 The top photograph shows the Owala Flip Kids water bottle with the cap in the closed position. The tube is crimped, and the text 'Closed Configuration' and 'Tube is completely crimped' is overlaid in red. The bottom photograph shows the cap being flipped open, and the tube is partially uncrimped. The text 'Transition To Closed Configuration' and 'Partially Crimped' is overlaid in red, with a red line pointing to the partially crimped section of the tube.

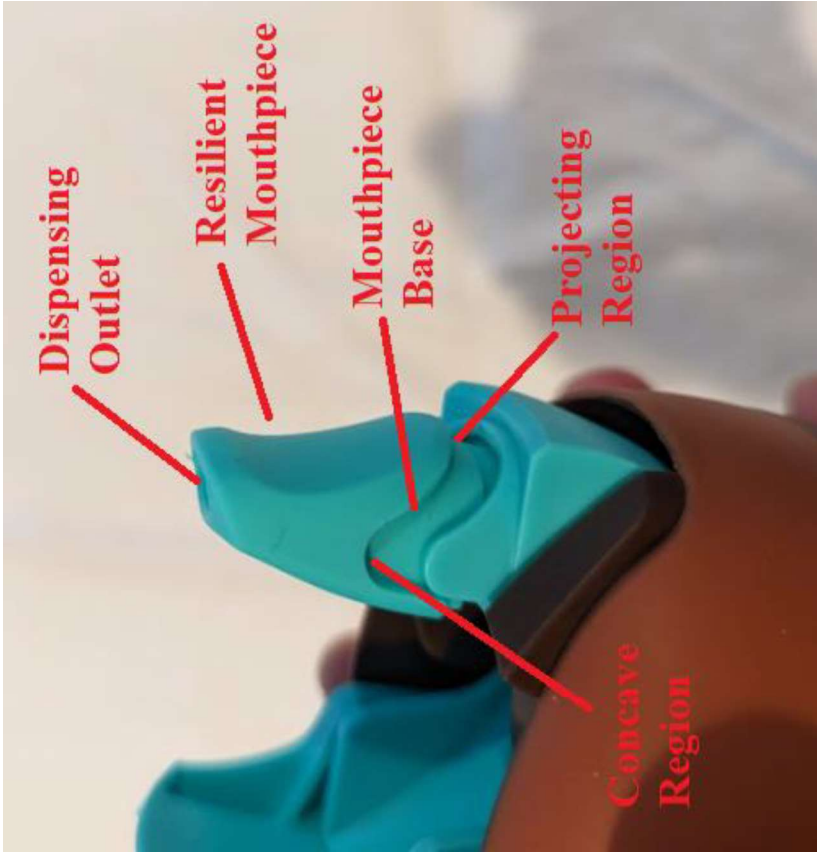
Claim	Claim Language	Mapping to Owala Flip Kids
1(1)	wherein when the manual on/off valve is in the open configuration, the tube is not crimped and does not obstruct the flow of drink fluid through the fluid conduit.	

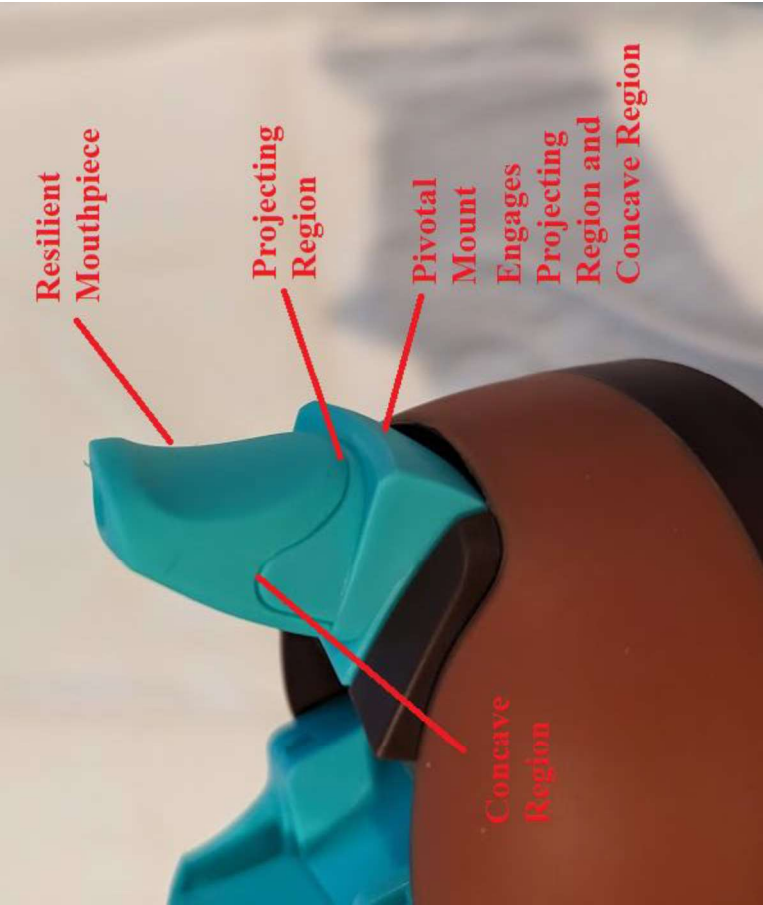
Claim	Claim Language	Mapping to Owala Flip Kids
3	The drink container of claim 1, wherein the cap assembly includes a pair of lateral guards that extend on opposed sides of the resilient mouthpiece when the resilient mouthpiece and the resilient mouthpiece and the pivotal mount are in the stowed position, and further wherein the cap assembly includes a dust cover extending between the pair of lateral guards and positioned to protect the dispensing outlet of the resilient mouthpiece by extending across at least a portion of the dispensing outlet of the resilient mouthpiece when the resilient mouthpiece and the resilient mouthpiece and the pivotal mount are in the stowed position.	

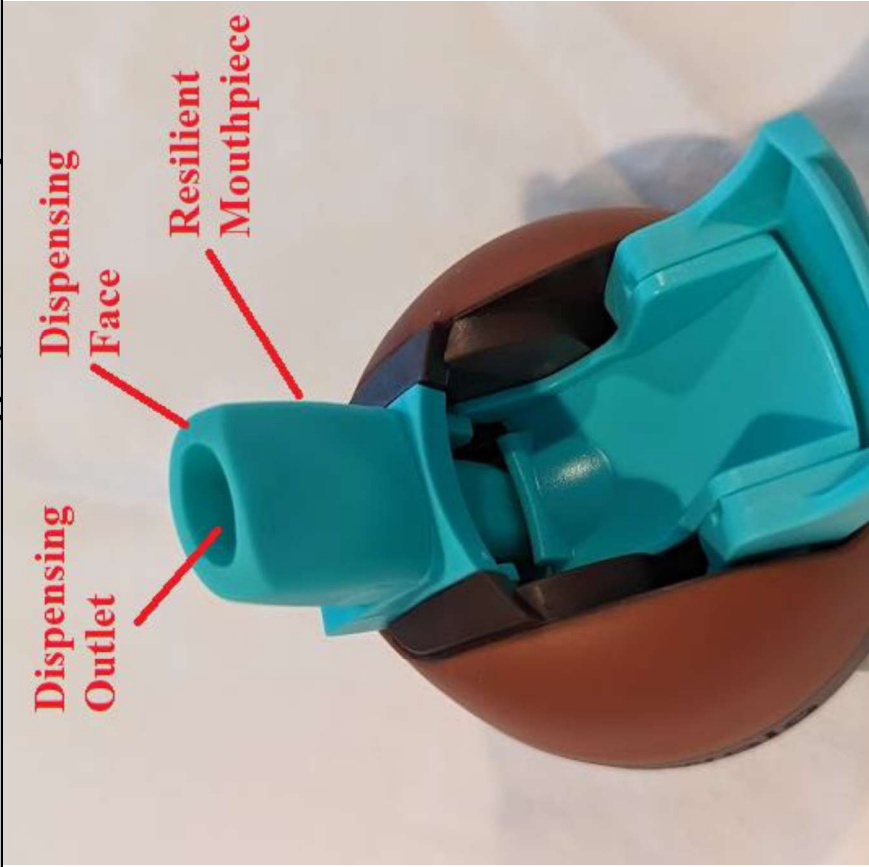
Claim	Claim Language	Mapping to Owala Flip Kids
4	The drink container of claim 3, wherein when the resilient mouthpiece is pivoted from the stowed position to the dispensing position, the resilient mouthpiece pivots away from the dust cover.	 The diagram illustrates the mechanical components and movement of the Owala Flip Kids drink container. Key parts labeled include: Dust Cover: The upper, teal-colored protective cap. Resilient Mouthpiece: The flexible, teal-colored drinking spout. Lateral Guards: Two teal-colored flaps on either side of the mouthpiece pivot point. Pivotal Movement: Indicated by a red curved arrow showing the mouthpiece rotating from a stowed position towards the dust cover to a dispensing position. Dispensing Position: The position where the mouthpiece is extended and ready for use. Cap Assembly Base: The brown, dome-shaped base of the container.

Claim	Claim Language	Mapping to Owala Flip Kids
5	The drink container of claim 3, wherein the dust cover projects above an upper surface of the cap assembly base.	 The image shows a close-up of the cap assembly of an Owala Flip Kids water bottle. The bottle has a teal body and a brown cap assembly. A teal flip lid is attached to the cap. Red lines point from text labels to specific parts of the cap: 'Dust Cover' points to the teal flip lid, and 'Upper Surface of Cap Assembly Base' points to the brown base of the cap.

Claim	Claim Language	Mapping to Owala Flip Kids	
9	The drink container of claim 1, wherein the resilient mouthpiece includes projections that extend generally transverse to the portion of the fluid conduit that extends through the resilient mouthpiece, and further wherein the projections engage an end region of the pivotal mount.	 Fluid Conduit Projection End Region of Pivotal Mount	 Fluid Conduit Projection End Region of Pivotal Mount
11	The drink container of claim 1, wherein the resilient mouthpiece is configured to be selectively removed from and recoupled to the pivotal mount.	 Resilient Mouthpiece (Removed) Pivotal Mount	 Resilient Mouthpiece (Recoupled) Pivotal Mount

Claim	Claim Language	Mapping to Owala Flip Kids
12	The drink container of claim 11, wherein the resilient mouthpiece includes a mouthpiece base with an end distal the dispensing outlet that has a contoured configuration that does not extend at a constant distance from the dispensing outlet, wherein the end of the resilient mouthpiece base includes a projecting region and a concave region, wherein the projecting region of the end of the mouthpiece base extends a greater distance away from the dispensing outlet than the concave region of the end of the mouthpiece base, and further wherein the pivotal mount is configured to engage the projecting region and the concave region of the mouthpiece base to restrict rotation of the resilient mouthpiece relative to the pivotal mount.	

Claim	Claim Language	Mapping to Owala Flip Kids
		 Resilient Mouthpiece Projecting Region Pivotal Mount Engages Projecting Region and Concave Region Concave Region

Claim	Claim Language	Mapping to Owala Flip Kids
13	The drink container of claim 1, wherein the resilient mouthpiece includes a dispensing face, and further wherein the dispensing outlet extends through the dispensing face of the resilient mouthpiece.	

Claim	Claim Language	Mapping to Owala Flip Kids
19	The drink container of claim 1, wherein the flexible tube is secured to the pivotal mount.	