THE HONORABLE KYMBERLY K. EVANSON

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SHENZHEN ROOT TECHNOLOGY CO., LTD., et al., Plaintiffs, v. CHIARO TECHNOLOGY Ltd., Defendant.	Case No. 2:23-cv-631 **ELVIE'S DISCLOSURE OF ASSERTED CLAIMS AND SUPPLEMENTAL INFRINGEMENT CONTENTIONS**
CHIARO TECHNOLOGY LTD., Counterclaim Plaintiff, v. SHENZHEN ROOT TECHNOLOGY CO., LTD., et al. Counterclaim Defendants.	

ELVIE'S DISCLOSURE OF ASSERTED CLAIMS AND SUPPLEMENTAL INFRINGEMENT CONTENTIONS UNDER LOCAL PATENT RULE 120

Pursuant to Local Patent Rule 120 of the United States District Court for the Western District of Washington, and this Court's June 28, 2024 Order (Dkt. No. 124), Defendant and Counterclaim Plaintiff Chiaro Technology Ltd., Inc., d/b/a Elvie ("Elvie") provides the following Disclosure of Asserted Claims and Supplemental Infringement Contentions concerning the

infringement by Plaintiffs and Counterclaim Defendants Shenzhen Root Technology Co., Ltd., Hong Kong Lute Technology Co., Ltd., Shenzhen Conglin E-Commerce Co., Ltd., Shenzhen Root E-Commerce Co., Ltd., Shenzhen TPH Technology Co., Ltd., Shenzhen Lutejiacheng Network Technology Co., Ltd., Shenzhen Jinruihang Technology Co., Ltd., and Shenzhen Xitao Network Technology, Co., Ltd. (collectively, "Momcozy") of U.S. Patent Nos. 11,357,893 (the "'893 patent"), 11,413,380 (the "'380 patent"), 11,813,381 (the "'381 patent"), and 11,806,454 (the "'454 patent") (collectively, the "Asserted Patents").

I. PRELIMINARY STATEMENT

Elvie's contentions are based on information reasonably available to it at this time. As of the date of these disclosures, fact discovery is in the early stages, the parties have yet to identify what, if any, terms need to be construed, fact depositions have not yet occurred, and expert discovery has not yet commenced. Thus, Elvie's investigation is ongoing.

Additional fact and expert discovery is anticipated, including without limitation, development documents related to and expert testing of Momcozy's accused products, which include the Momcozy S9, S9 Pro, S12, S12 Pro, M1, M5, V1, V2, Mobile Style (M6), and Mobile Flow (M9) products, the Paruu P3, P10, P15, P16, R10, R12, Y10, X1, and X2 products, and the Pibur P15 product, as well as associated accessory or replacement products (collectively, the "Accused Products"). Moreover, Momcozy's production of responsive documents and information remains deficient, and Elvie expects to receive detailed technical information on the Accused Products. However, based on the current discovery, Elvie contends that the Accused Products infringe, directly and indirectly, the asserted claims of at least one of the Asserted Patents, as set forth herein.

Momcozy recently disclosed in discovery responses its ownership of eight additional breast pump products sold under the Paruu and Pibur brands. These newly disclosed breast pump products appear to infringe the Asserted Patents, as explained below. Elvie is awaiting discovery on the Paruu and Pibur products and will amend its Infringement Contentions as discovery

becomes available. At the outset, however, several of the newly identified Paruu and Pibur products appear substantively the same as or similar to previously accused Momcozy products such that Elvie's Infringement Contentions generally apply. For example, Elvie's Infringement Contentions for the Momcozy S9 product applies to at least the Paruu X1; Elvie's Infringement Contentions for the Momcozy S9 and S12 products apply to at least the Paruu Y10 and R12 products; Elvie's Infringement Contentions for the Momcozy S9 Pro and S12 Pro products apply to at least the Paruu R10 product; and Elvie's Infringement Contentions for the Momcozy M1 product applies to at least the Paruu P10 and P16 products and to the Pibur P15 product. Elvie reserves the right to supplement these contentions with evidence and support disclosed during discovery.

Additionally, Momcozy failed to timely identify the Mobile Style and Mobile Flow products in its interrogatory responses, despite Elvie's repeated insistence that Momcozy supplement their identification of products. Elvie recently identified these new Momcozy products on the eve of its Infringement Contentions deadline through its own investigation. The Momcozy Mobile Style (M6) product became available to the public mere months ago and Elvie discloses herein exemplary infringement claim charts. As Elvie's investigation is still ongoing, Elvie intends to amend and/or supplement its contentions as to the Mobile Style as discovery continues. Upon information and belief, the Momcozy Mobile Flow (M9) is only recently available to the public, but Momcozy has not produced any technical information regarding it, so Elvie intends to supplement its Infringement Contentions as that information and discovery becomes available.

Subject to the Federal Rules of Civil Procedure and the United States District Court for the Western District of Washington's Local Civil Rules and Local Patent Rules, Elvie reserves the right to move to amend and/or supplement these disclosures based on, without limitation, any amendments or supplements to Momcozy's noninfringement contentions or invalidity contentions. Elvie further reserves the right to move to amend and/or supplement these disclosures based on, including without limitation, any documents, information, or things received from or produced to

Momcozy during fact or expert discovery. Elvie specifically reserves the right to supplement these contentions to add additional products that have not yet been disclosed in discovery and are of substantively the same or similar design to the Accused Products.

The Court has not yet construed the terms of the asserted claims of Elvie's Asserted Patents. Pursuant to Local Patent Rule 124, Elvie reserves the right to amend these contentions based on the Court's claim construction rulings. These contentions shall not be construed as: (i) an adoption of any particular claim scope of construction; (ii) an admission that any particular claim limitation requires construction; or (iii) an admission that any particular claim language constitutes a substantive claim limitation.

Elvie incorporates herein by references all written discovery responses served by the parties in this action. Elvie also incorporates herein by reference any and all expert reports, declarations, disclosures, and testimony in support of the information disclosed in these contentions.

Elvie does not waive any claims or defenses that may be asserted in this case. These contentions may be asserted in the alternative and do not constitute any concession by Elvie for purposes of claim construction or infringement, nor does Elvie waive any arguments that may be made or position that may be taken regarding the proper construction of any claim term.

Elvie objects to the disclosure of information protected by the attorney-client privilege, attorney work-product immunity, the common-interest privilege, or any other applicable privilege or immunity. To the extent that Elvie inadvertently disclosed information that may be protected from discovery under the attorney-client privilege, the attorney work-product immunity, or any other applicable privilege or immunity, such inadvertent disclosure does not constitute a waiver of any such privilege or immunity.

Elvie reserves the right to rebut any of Momcozy's noninfringement contentions based on any and all inconsistencies between Momcozy's noninfringement contentions and Momcozy's invalidity contentions.

II. ASSERTED CLAIMS

Elvie contends that Momcozy's Accused Products infringe, directly and indirectly, one or more of the Asserted Patents under 35 U.S.C. § 271(a), (b), or (c), either literally or through the doctrine of equivalents, as shown in the attached exemplary claim charts, Exhibits 1–23:

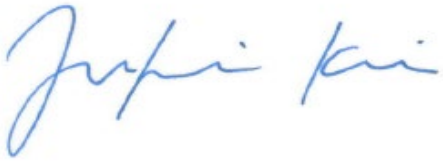
Ex. No.	U.S. Patent No.	Asserted Claims	Accused Product
1	11,357,893	1-4, 7, 11, 14, 16, 19, 20, 25, 28	S9
2	11,357,893	1-4, 7, 11, 14, 16, 19, 20, 25, 26, 28	S12
3	11,357,893	1-4, 7, 11, 14, 16, 19, 20, 25, 26, 28	S9 Pro
4	11,357,893	1-4, 7, 11, 14, 16, 19, 20, 25, 26, 28	S12 Pro
5	11,357,893	1-4, 7-11, 14, 16-20, 25, 26, 28	M1
6	11,357,893	1-4, 7-11, 14, 16, 18-20, 25, 26, 28	M5
7	11,357,893	1-4, 6-11, 14, 16-20, 25, 26, 28	Mobile Style
8	11,413,380	29, 30, 32, 34, 35, 37-39, 41-46	S9
9	11,413,380	29, 30, 32, 34, 35, 37-39, 41-46	S12
10	11,413,380	29, 30, 32, 34, 35, 37-39, 41-46	S9 Pro
11	11,413,380	29, 30, 32, 34, 35, 37-39, 41-46	S12 Pro
12	11,413,380	29-32, 35-37, 39-41, 43-46	M1
13	11,413,380	29-32, 34-39, 41-46	M5
14	11,413,380	29-32, 35-37, 39, 41, 43-46	Mobile Style
15	11,813,381	1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29	S9
16	11,813,381	1, 2, 6, 11-13, 16, 17, 21, 23, 24, 26, 27, 29	S12
17	11,813,381	1, 2, 6, 11-13, 16, 17, 21, 23, 24, 26, 27, 29	S9 Pro
18	11,813,381	1, 2, 6, 11-13, 16, 17, 21, 23, 24, 26, 27, 29	S12 Pro
19	11,806,454	17-19, 21-33	V1
20	11,806,454	17-19, 21-33	V2
21	11,357,893	1-3, 7-14, 16-21, 23-26, 28	Mobile Flow
22	11,413,380	1-13, 15-24, 26-39, 41-46	Mobile Flow
23	11,813,381	1-9, 11-18, 20-24, 26, 29	Mobile Flow

Elvie's Supplemental Infringement Contentions are meant to be illustrative at this time. In no way are these contentions intended to be a complete recitation or explanation of the evidence that supports Elvie's contentions or to limit Elvie's ability to rely on other documents or information or other portions of cited documents. Moreover, Elvie may supplement its Supplemental Infringement Contentions as additional discovery becomes available on each of the Accused Products.

III. PRIORITY DATES

Pursuant to Local Patent Rule 120(f), Elvie states that each claim for the '893 patent, '380 patent, and '381 patent is entitled to a priority date of no later than June 15, 2017. Each claim for the '454 patent is entitled to a priority date of no later than March 26, 2020.

DATED: August 1, 2024



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Pursuant to Local Patent Rule 120(a), Elvie restates herein that it asserts claims 1-3, 7-14, 16-21, 23-26, and 28 of the '893 patent. For the reasons stated below, Momcozy's activities in connection with the manufacture, use, sale, offer for sale, and/or importation of the Momcozy Mobile Flow device will constitute infringement under 35 U.S.C. §§ 271(a), (b), and (c) of the asserted claims.

Pursuant to Local Patent Rule 120(b), Elvie specifically identifies the Momcozy Mobile Flow device as the "Accused Device." The Momcozy Mobile Flow device contains each and every limitation of claims 1-3, 7-14, 16-21, 23-26, and 28 of the '893 patent literally or under the doctrine of equivalents, and thus infringe those asserted claims as set forth herein.

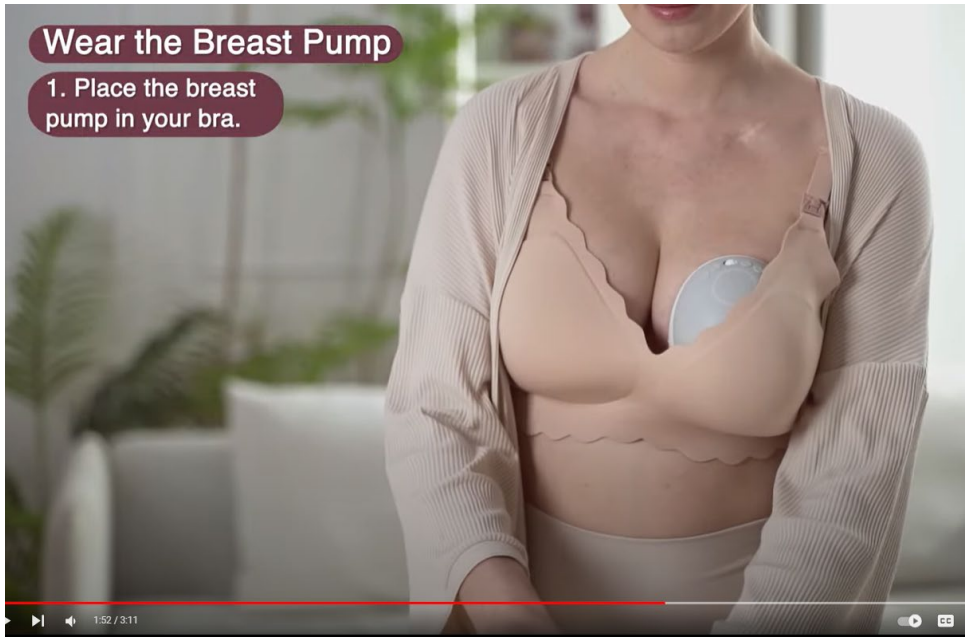
Pursuant to Local Patent Rule 120(c)–(e), Elvie submits the following claim chart identifying specifically where each limitation of each asserted claim is found within the Accused Device either directly, literally or under the doctrine of equivalents, or indirectly. Elvie reserves the right to modify and/or supplement the claim chart herein where appropriate as discovery progresses. In the event that a claim limitation is deemed to be missing under a literal infringement analysis, Elvie reserves the right to demonstrate the presence of a substantial equivalent of such an element and to pursue infringement under the doctrine of equivalents.

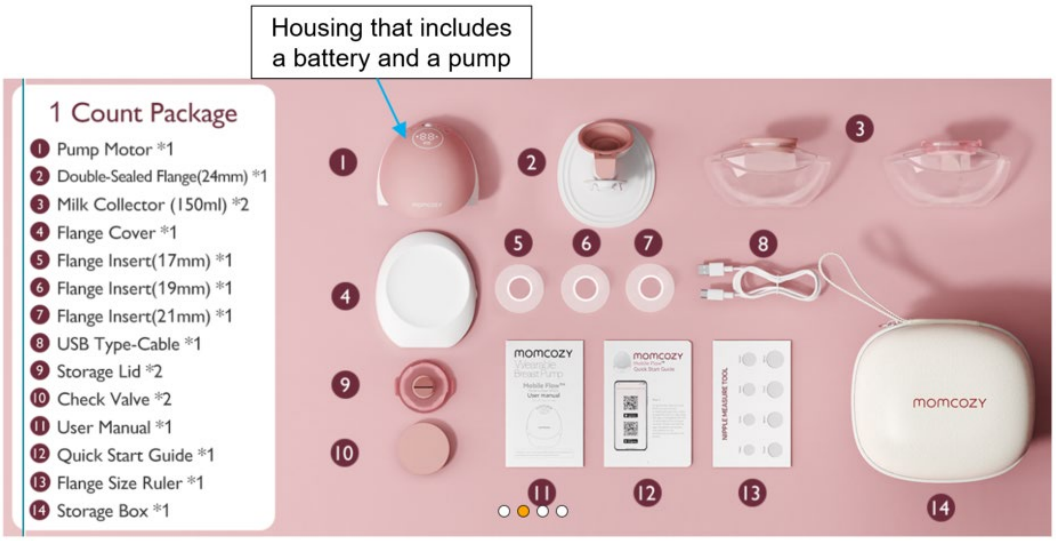
Pursuant to Local Patent Rule 120(f), Elvie states that each asserted claim of the '893 patent is entitled to a priority date that is no later than June 15, 2017.

Elvie reserves the right to base its infringement case on additional information in Momcozy's production, deposition testimonies, interrogatory responses, responses to requests for admission, and/or any other pleadings, as well as expert testing and/or testimony. In particular, Elvie reserves the right to modify and/or supplement the theories disclosed herein in view of any additional evidence regarding infringement.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
1.P	A breast pump device that is configured as a self-contained, in-bra wearable device, the breast pump device comprising:	The Momcozy Mobile Flow is a breast pump device that is configured as a self-contained, in-bra wearable device. The Momcozy Mobile Flow is advertised as a “Wearable Breast Pump.” (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) The Momcozy Mobile Flow is an in-bra wearable device.

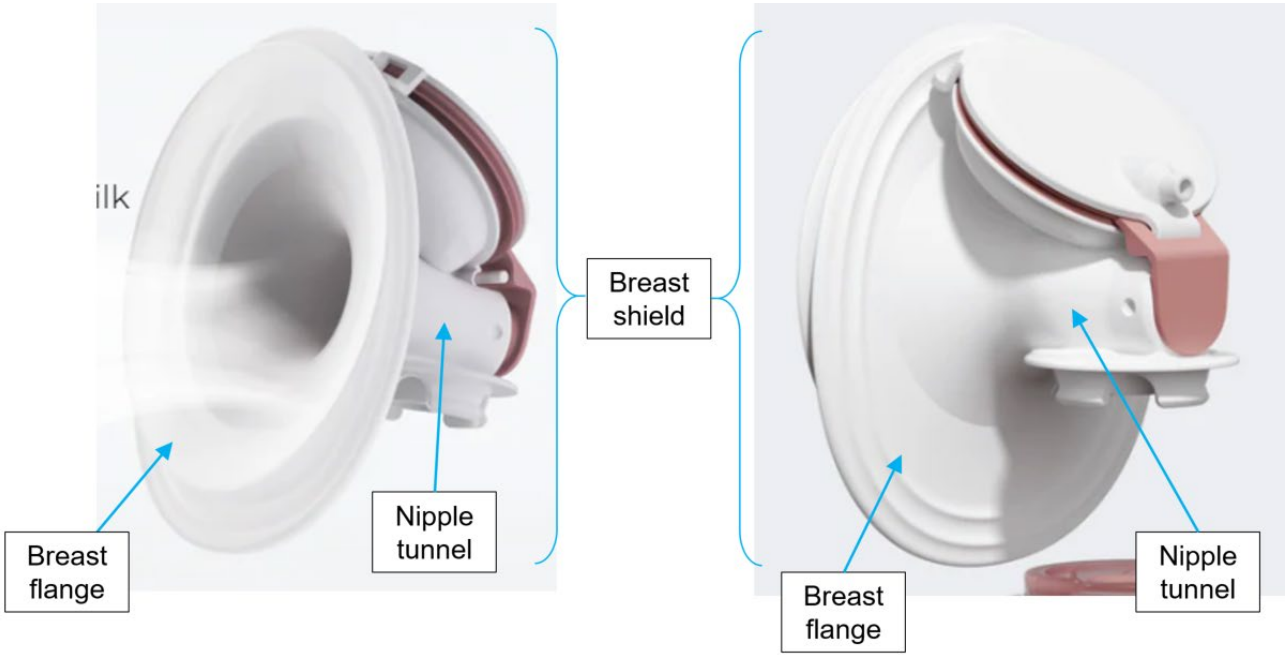
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) As shown above, the Momcozy Mobile Flow fits inside a user’s bra. Momcozy’s Amazon listing describes the Momcozy Mobile Flow as “More Fit & Discreet: Mobile Flow breast pump adopts DoubleFit Flange combining soft and hard silicone to ensure better comfort and safety. The drop-shaped design of the M9 breast pump fits seamlessly in the pump bra, allowing moms to pump with total privacy.” (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.)

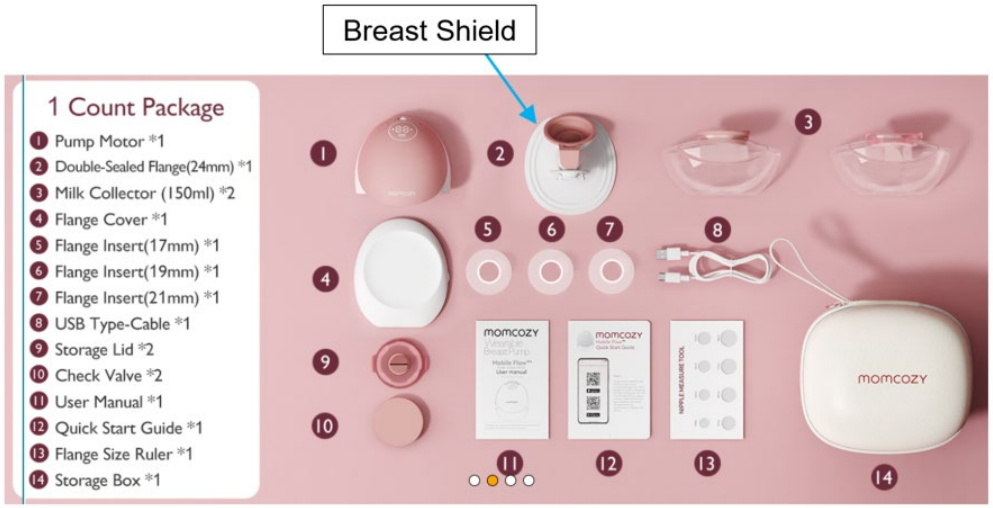
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		Momcozy Mobile Flow User Manual instructs users to “secure Pump in place by bra, taking care to keep Pump pressed firmly against breast. If necessary, tighten bra to keep pump securely in place and start pumping.” (Momcozy Mobile Flow User Manual, p. 25.)  Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 52 seconds.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
1.1	a housing that includes: a battery, and a pump powered by the battery and generating negative air pressure;	The Momcozy Mobile Flow includes a housing that includes a battery and a pump powered by the battery and generating negative air pressure.  (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) The Momcozy Mobile Flow housing includes a battery. For example, as shown below, Momcozy states that the Mobile Flow device includes a battery with “large battery capacity, “1800mAh battery life,” “6 sessions per charge,” and “150 minutes of usage.” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) Further, Momcozy instructs users “[b]efore the first use, charge with the 5V/2A charging adapter until the battery icon is fully lit and solid.” (Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, https://www.youtube.com/watch?v=E_V1cCRB6gY, at 13 seconds.)

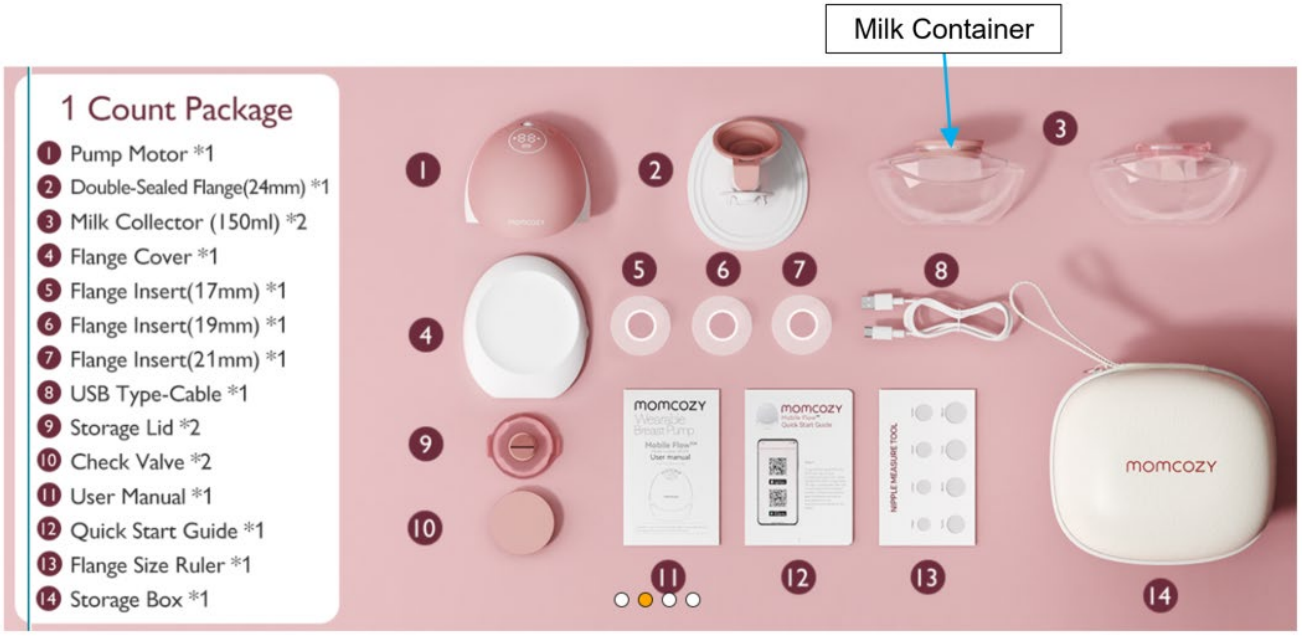
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) As shown below, the Momcozy Mobile Flow housing includes a pump powered by the battery and configured to generate negative air pressure. Momcozy states that “[t]he 3rd-gen pump motor offers powerful suction up to -300mmHg to increase milk output,” and has “15 intensities [for] customizable settings [and] maximum comfort and milk flow.” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
1.2	a breast shield made up of a breast flange and a nipple tunnel;	The Momcozy Mobile Flow includes a breast shield made up of a breast flange and a nipple tunnel.  (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) The Momcozy Mobile Flow includes a “Double-sealed flange (24mm).” (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

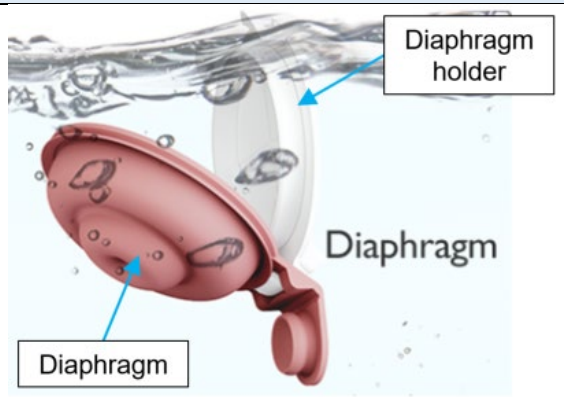
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

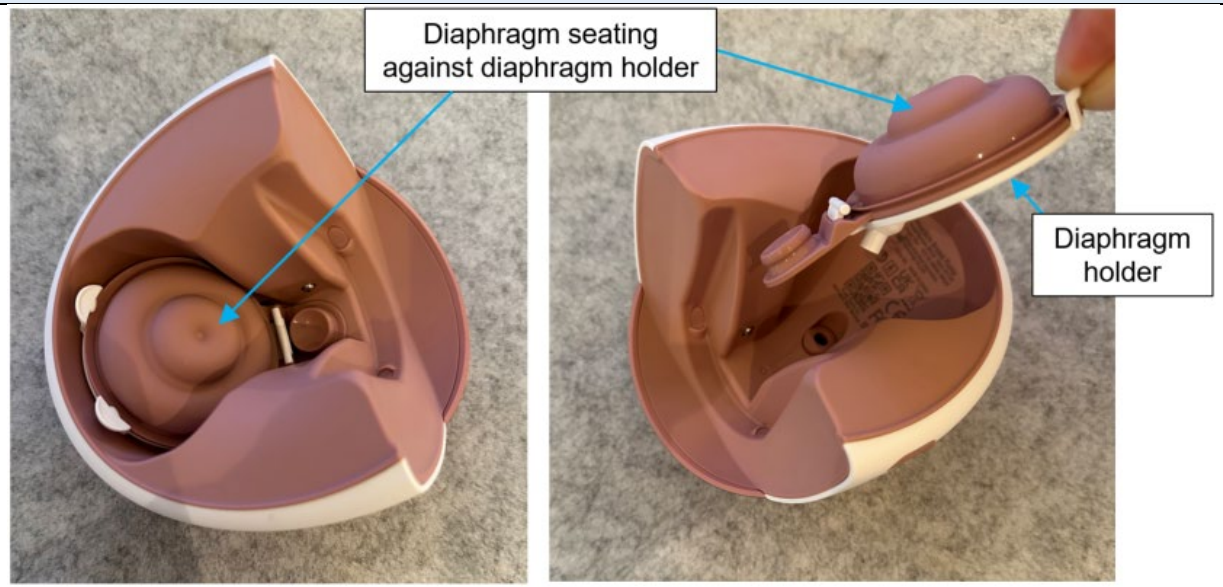
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
1.3	a milk container that is configured to be attached to and removed from the housing; and	The Momcozy Mobile Flow includes a milk container that is configured to be attached to and removed from the housing. Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 3 minutes 5 seconds.) The Momcozy website indicates that the Mobile Flow has a “bottle capacity: 150ml.” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

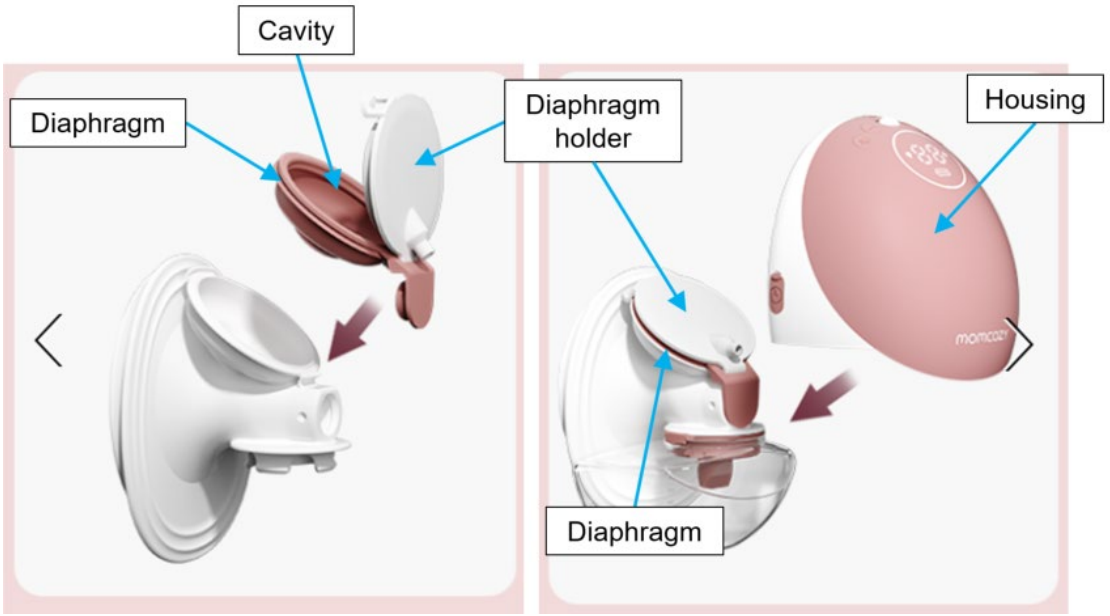
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) The Momcozy Mobile Flow milk container is configured to be attached to and removed from the housing, via the breast shield’s connection with the housing.

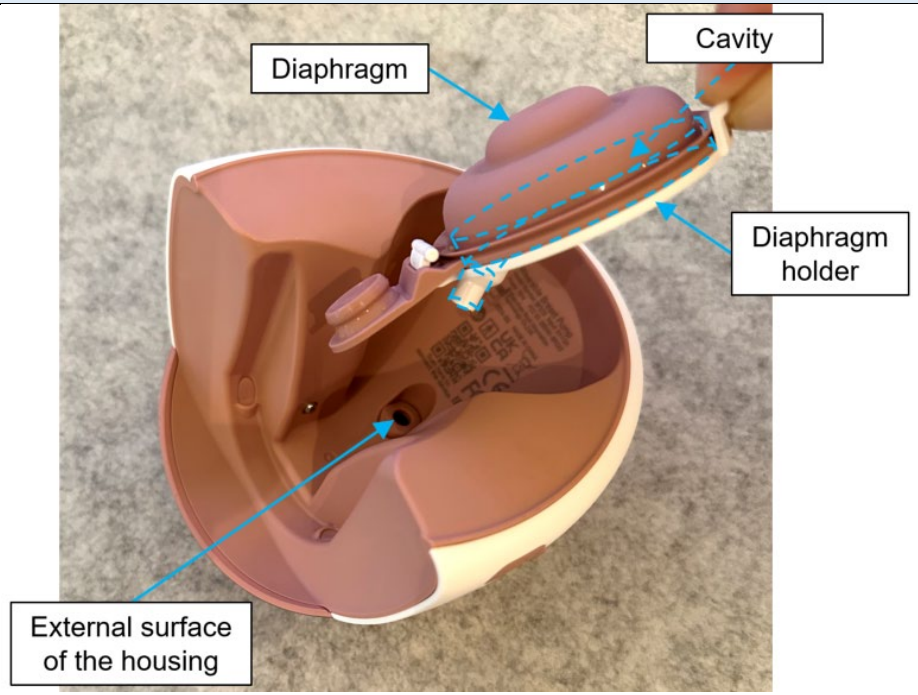
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump; https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) To the extent that the Momcozy Mobile Flow does not literally attach the milk container to the housing, this claim is met under the doctrine of equivalents. The Momcozy Mobile Flow’s milk container is configured to attach to the housing, via the breast shield’s connection with the housing. This attachment of the milk container performs substantially the same function as the claimed attachment of mounting the milk container relative to the housing in a compact arrangement. The attachment between the milk

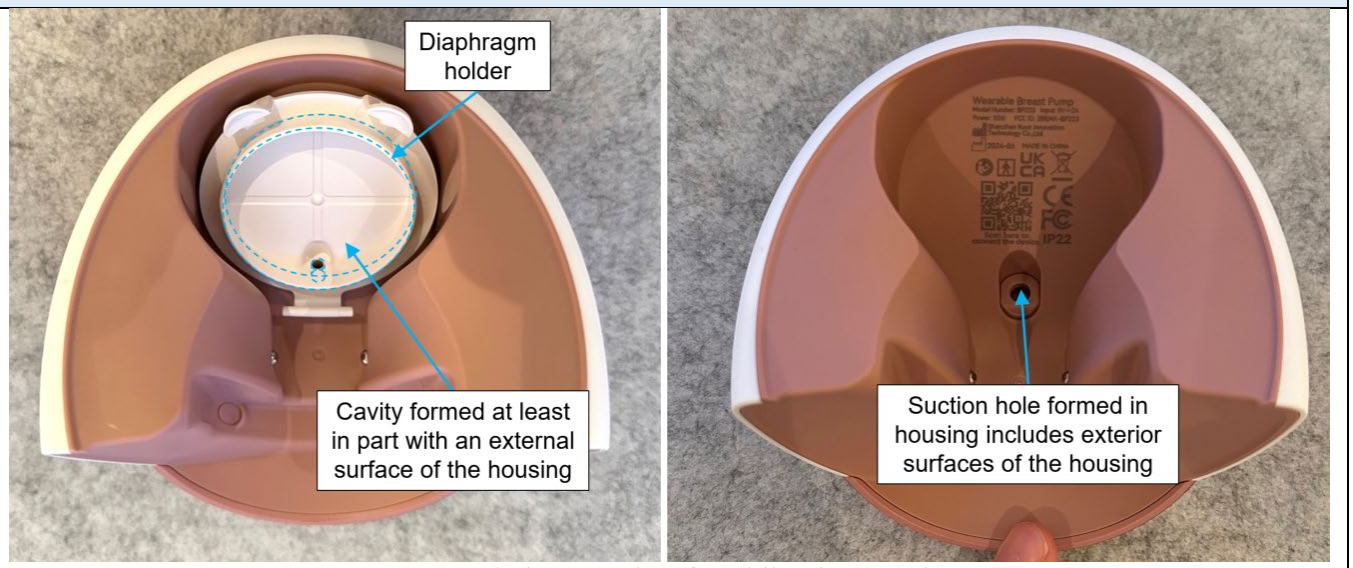
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		container, breast shield, and housing achieves the same result of positioning the milk container and housing in a compact arrangement such that the Mobile Flow device can be in-bra wearable. This attachment between the milk container, breast shield, and housing works in substantially the same way using a mechanical attachment configuration to couple the components together with a “click” fit. (*See* Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 18 seconds.) Further, the differences between a milk container that attaches directly to a housing and a milk container that attaches to a housing via a breast shield, such as in the Momcozy Mobile Flow device, are insubstantial. Accordingly, Momcozy Mobile Flow’s attachment of the milk container to the housing is equivalent to the claimed attachment under the doctrine of equivalents.
1.4	a diaphragm configured to be seated against a diaphragm holder that forms a recess or cavity at least in part with an external surface of the housing,	The Momcozy Mobile Flow includes a diaphragm configured to be seated against a diaphragm holder that forms a recess or cavity at least in part with an external surface of the housing. As shown below, the Momcozy Mobile Flow device includes a “diaphragm” that seats against a diaphragm holder. (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

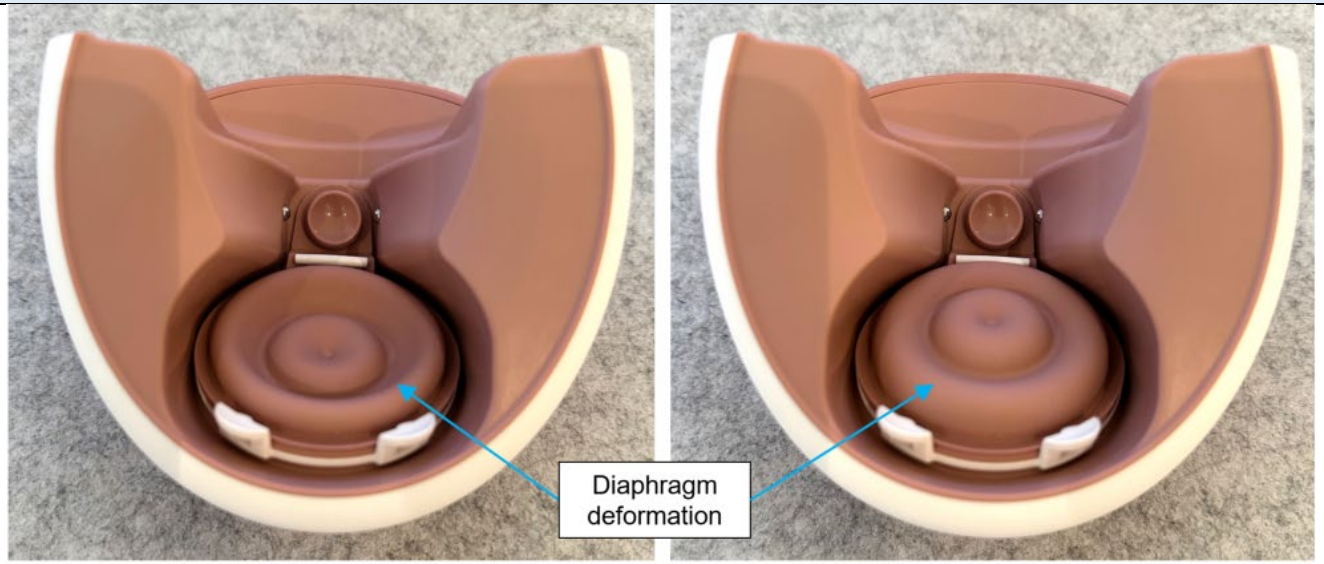
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

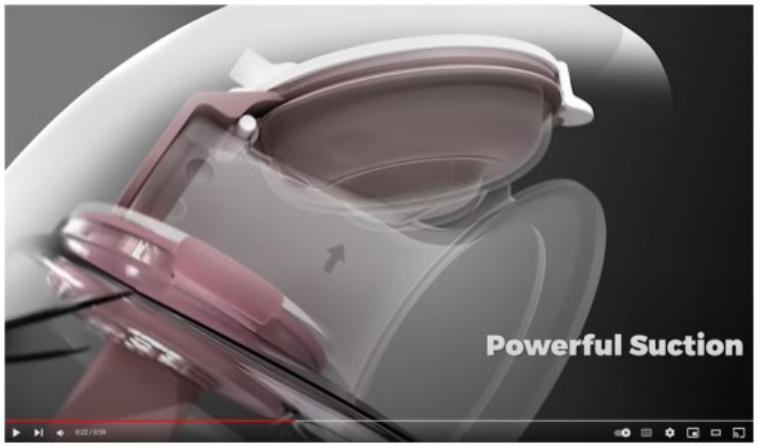
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Annotated photographs of Mobile Flow device showing diaphragm seated against the diaphragm holder. As shown below, the diaphragm is configured to be seated against the diaphragm holder that forms a recess or cavity above the diaphragm and between an external surface of the housing.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Annotated photograph of Mobile Flow Device.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Annotated photographs of Mobile Flow Device.
1.5	the diaphragm deforming in response to changes in air pressure caused by the pump to create negative air pressure in the nipple tunnel.	The Momcozy Mobile Flow’s diaphragm deforms in response to changes in air pressure caused by the pump to create negative air pressure in the nipple tunnel. The Momcozy Mobile Flow device includes 15 “adjustable suction levels,” and generates a “vacuum: -300mmHg.” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) As cyclic negative pressure is generated by the pump, the diaphragm deforms to create negative air pressure in the nipple tunnel. (*See* https://www.youtube.com/watch?v=UPKrZCbAkHI, at 22-24 seconds, showing deformation of the diaphragm in response to changes in air pressure caused by the pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Annotated photographs of Mobile Flow device.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		   “Momcozy Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=UPKrZCbAkHI, at 22-24 seconds.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
2	The breast pump device of claim 1, wherein the pump comprises a piezo air pump system.	*See* claim 1. The Momcozy Mobile Flow includes a pump. To the extent the Momcozy Mobile Flow does not include a piezo pump, the Momcozy Mobile Flow’s pump performs the same function, in substantially the same way, and achieves the same result as a piezo air pump system, and accordingly meets all elements of claim 2 under the doctrine of equivalents. The Momcozy Mobile Flow housing includes a pump configured to generate negative air pressure. The Momcozy website states that “[t]he 3rd-gen pump motor offers powerful suction up to -300mmHg to increase milk output,” and has “15 intensities [for] customizable settings for maximum comfort and milk flow.” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) As shown below, Momcozy show an illustration of the pump within the housing.

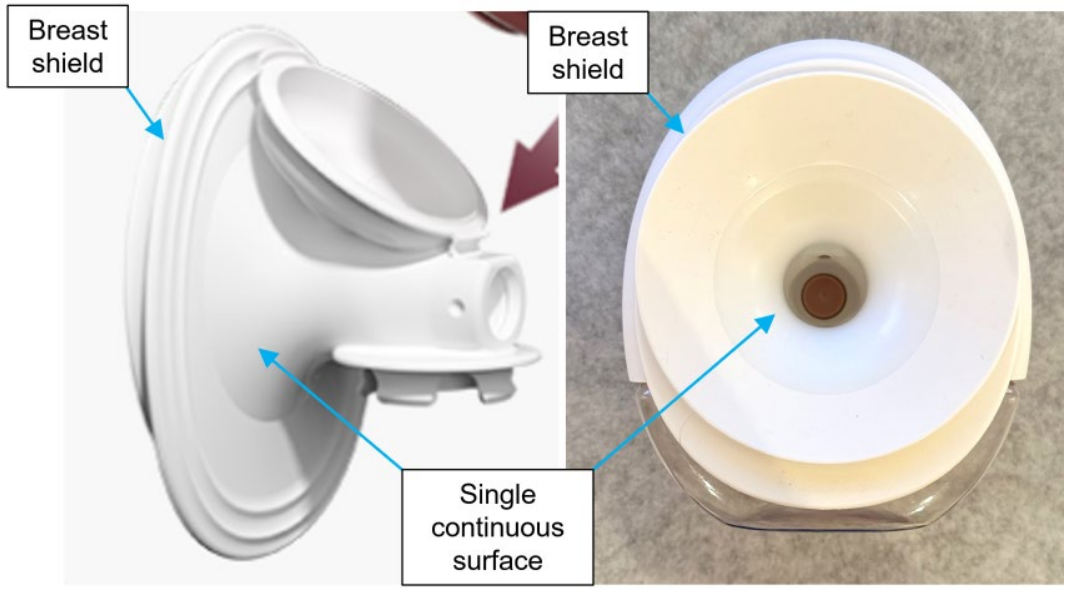
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.) The Momcozy Mobile Flow includes an air pump system. To the extent the Momcozy Mobile Flow does not literally use a piezo air pump system, this claim is met under the doctrine of equivalents. The Momcozy Mobile Flow’s pump and a piezo air pump perform substantially the same function of converting electrical energy into a mechanical movement to drive a diaphragm. And this mechanical movement of Momcozy

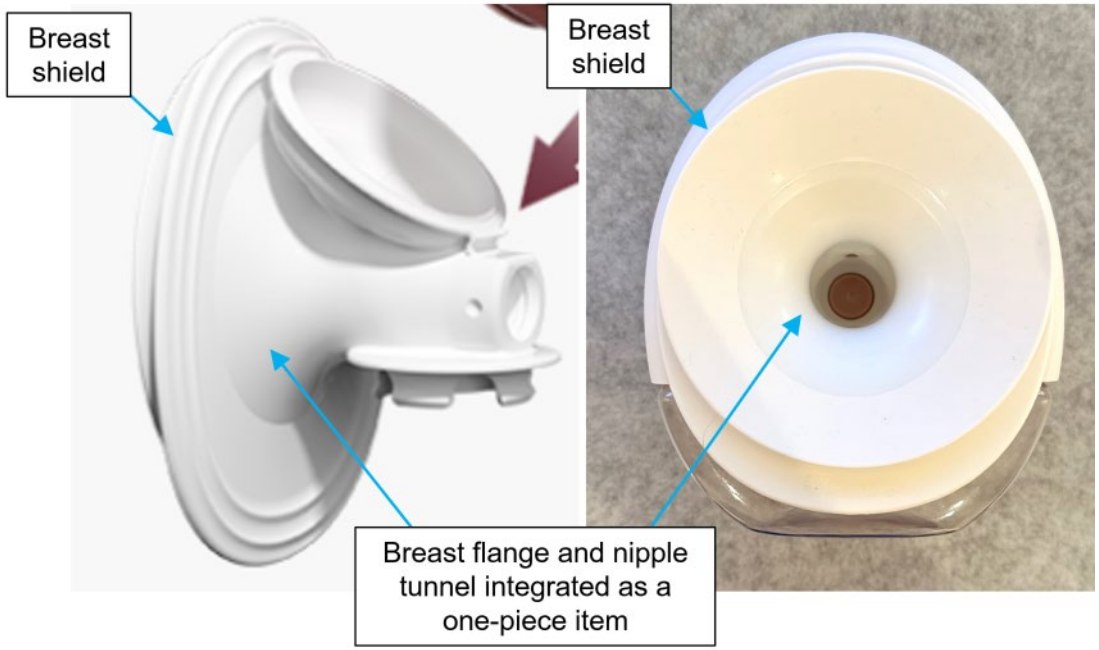
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		Mobile Flow’s air pump achieves the same result as a piezo air pump by producing negative pressure. Both Momcozy Mobile Flow’s air pump and a piezo air pump work in substantially the same way by utilizing a mechanical member to drive a diaphragm, thereby producing a pressure change. Further, the differences between the Momcozy Mobile Flow’s pump and a piezo air pump are insubstantial. Accordingly, Momcozy Mobile Flow’s air pump is equivalent to the claimed piezo air pump system under the doctrine of equivalents.

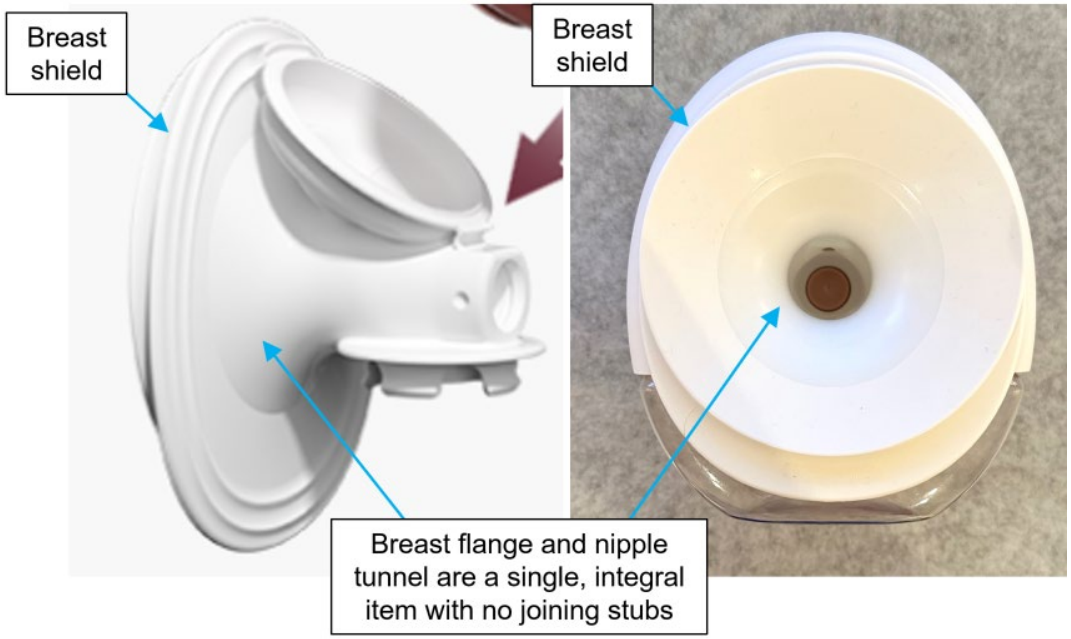
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
3	The breast pump device of claim 1, wherein the pump is positioned at or close to a base of the housing.	*See* claim 1. On information and belief, the Momcozy Mobile Flow includes a pump that is positioned at or close to a base of the housing. As shown below, Momcozy Mobile Flow’s pump is positioned close to the base of the housing. (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

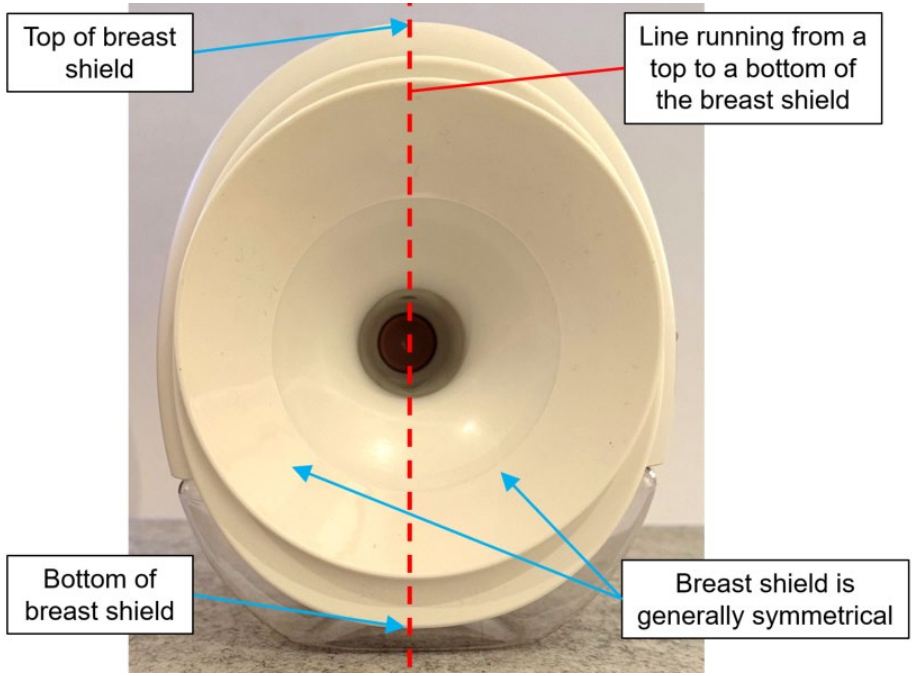
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
7	The breast pump device of claim 1, wherein the breast shield is configured to rotate smoothly around a nipple inserted into the nipple tunnel to provide a correct positioning of the breast shield onto a breast.	*See* claim 1. The Momcozy Mobile Flow includes a breast shield configured to rotate smoothly around a nipple inserted into the nipple tunnel to provide a correct positioning of the breast shield onto a breast. For example, as shown below, the Momcozy Mobile Flow is advertised as including “More Fit & Discreet: Mobile Flow breast pump adopts DoubleFit Flange combining soft and hard silicone to ensure better comfort and safety.” (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) Further, as shown below, the surface of the breast shield is smooth and allows rotation around the nipple to properly align the nipple tunnel around the user’s nipple.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
8	The breast pump device of claim 1, wherein the breast shield is a one piece item that, in use, presents a single continuous surface to a nipple and a breast.	*See* claim 1. The Momcozy Mobile Flow includes a breast shield that is a one piece item that, in use, presents a single continuous surface to a nipple and a breast. For example, Momcozy advertises that the Momcozy Mobile Flow “DoubleFit Flange . . . [p]romotes milk supply with a snug, comfortable fit, while minimizing milk leakage.” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) As shown below, the breast shield is a one piece item that presents a single continuous surface to a nipple and a breast. 

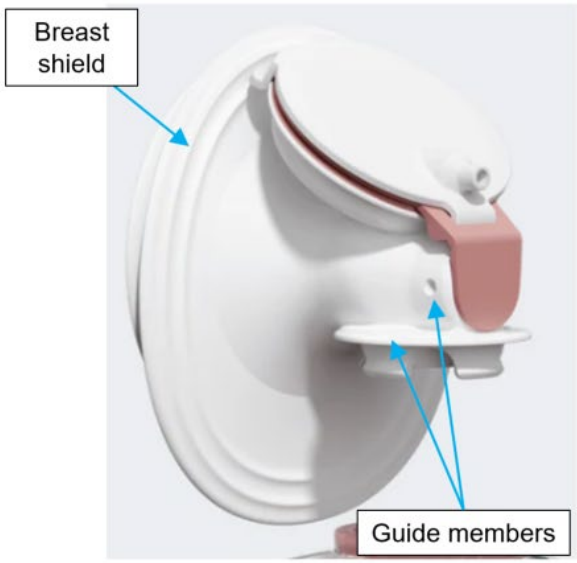
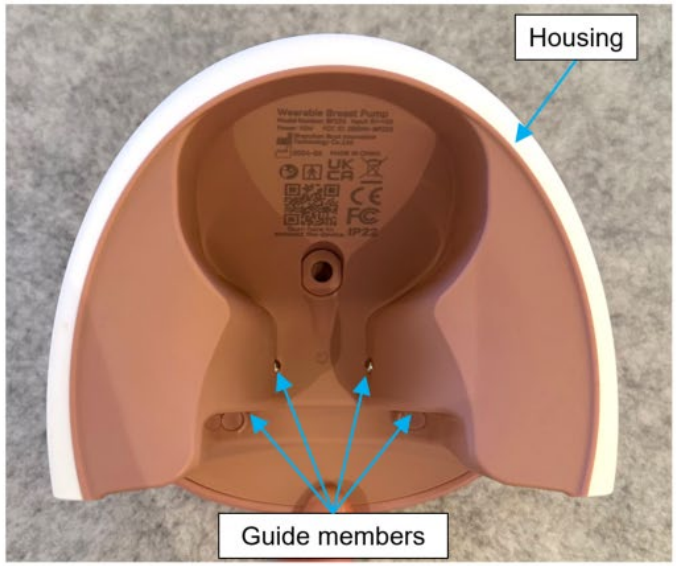
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		(https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp; annotated photographs of Momcozy Mobile Flow device.)
9	The breast pump device of claim 1, wherein the breast shield integrates the breast flange and nipple tunnel as a one-piece item.	*See* claim 1. The Momcozy Mobile Flow includes a breast shield that integrates the breast flange and nipple tunnel as a one-piece item. For example, as shown below, the breast shield integrates the breast flange and the nipple tunnel as a one-piece item. 

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		(https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp; annotated photographs of Momcozy Mobile Flow device.)
10	The breast pump device of claim 1, wherein the breast flange and the nipple tunnel are a single, integral item with no joining stubs.	*See* claim 1. The Momcozy Mobile Flow includes a breast flange and a nipple tunnel that are a single, integral item with no joining stubs. For example, as shown below, the breast flange and the nipple tunnel are a single, integral item with no joining stubs. 

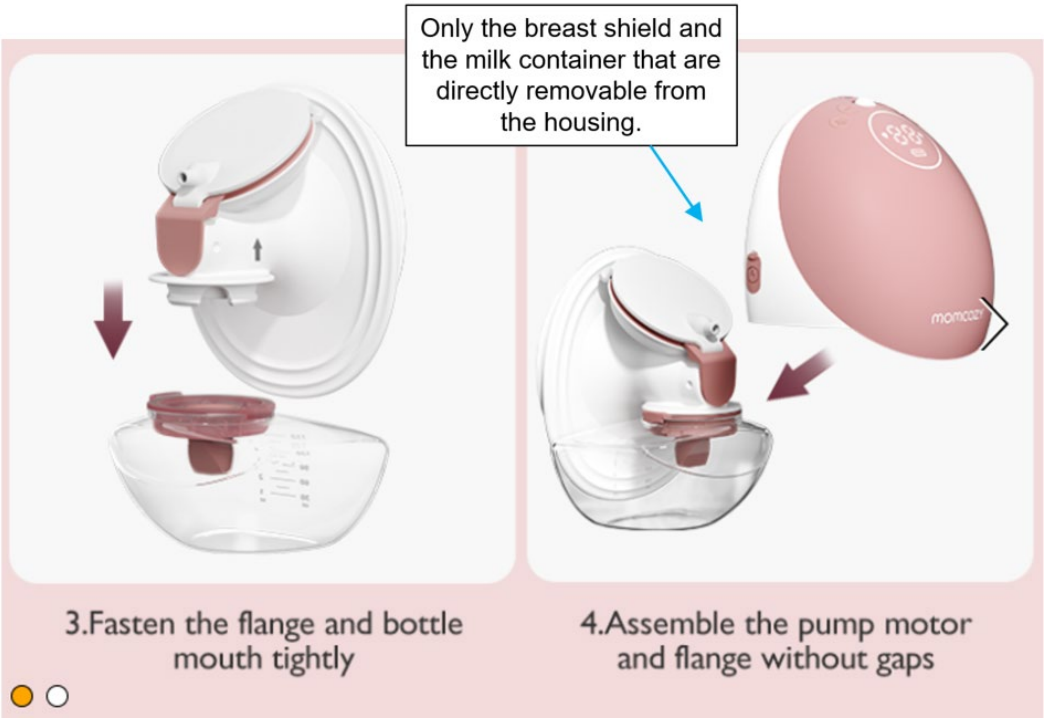
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		(https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp; annotated photographs of Momcozy Mobile Flow device.)
11	The breast pump device of claim 1, wherein the breast shield is generally symmetrical about a centre-line running from a top to a bottom of the breast shield when positioned upright for normal use.	*See* claim 1. The Momcozy Mobile Flow breast shield is generally symmetrical about a center-line running from a top to a bottom of the breast shield when positioned upright for normal use. As shown below, the Momcozy Mobile Flow includes a breast shield that is generally symmetrical about a center-line running from a top to a bottom of the breast shield when positioned upright for normal use.  Annotated photograph of Momcozy Mobile Flow device.

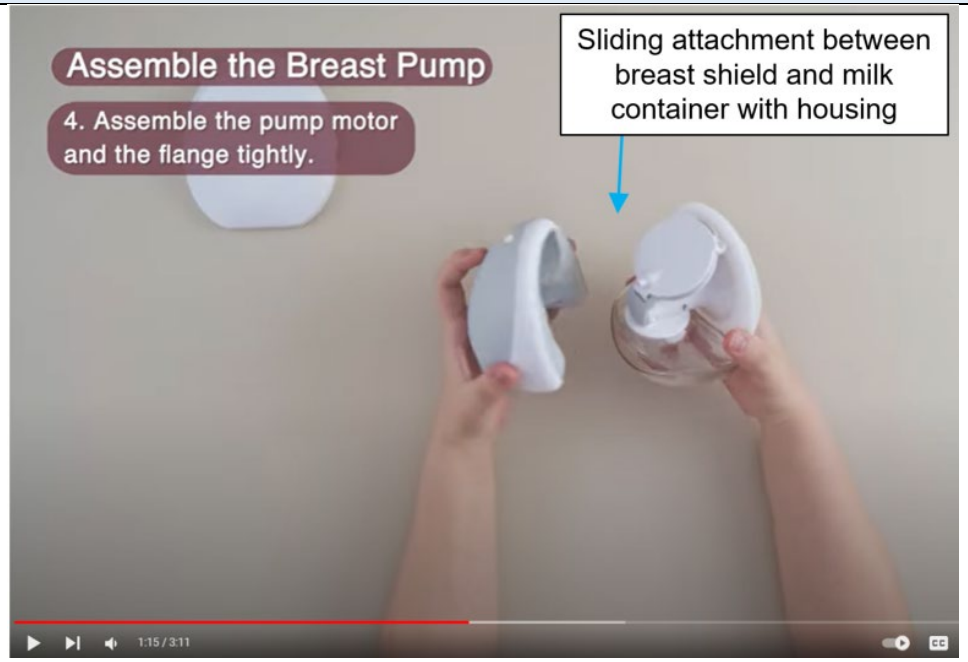
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
12	The breast pump device of claim 1, wherein the housing is configured to slide onto the breast shield, when the breast shield has been placed onto a breast, using guide members.	*See* claim 1. The Momcozy Mobile Flow housing is configured to slide onto the breast shield, when the breast shield has been placed onto a breast, using guide members. As shown below, the Momcozy Mobile Flow’s housing is configured to slide onto the breast shield using guide members. The Momcozy Mobile Flow advertising material instructs a user to “assemble the pump motor and flange without gaps.” (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.) (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		The sliding attachment of the breast shield with the housing is shown in the Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, screen shot reproduced below. Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 15 seconds.) To facilitate the sliding attachment between the breast shield and housing, both the breast shield and housing include guide members to guide the housing over the nipple tunnel and on to the breast shield. For

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		example, as shown below the housing includes protruding attachment features that locate in recesses on the nipple tunnel of the breast shield. The housing also includes multiple contoured surfaces that correspond to the exterior profile of the nipple tunnel to guide the housing over the nipple tunnel of the breast shield.   (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump; annotated photograph of Momcozy Mobile Flow housing.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
13	The breast pump device of claim 1, wherein the breast pump device includes only the breast shield and the milk container that are directly removable from the housing in normal use or normal dis-assembly.	*See* claim 1. The Momcozy Mobile Flow includes only the breast shield and the milk container that are directly removable from the housing in normal use or normal dis-assembly. As shown below, the Momcozy Mobile Flow’s breast shield and milk container slide into attachment with the housing and are the only component that slideably attach to the housing. The Momcozy Mobile Flow advertising material instructs a user to “fasten the flange and bottle mouth tightly . . . [and] assemble the pump motor and flange without gaps.” (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.) The sliding attachment of the breast shield and milk container with the housing is shown in the Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, screen shot reproduced below.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 15 seconds.) To the extent that the diaphragm and diaphragm housing component are not literally part of the breast shield, this claim is met under the doctrine of equivalents. The Momcozy Mobile Flow diaphragm is assembled to and moves with the breast shield such that the assembly of the breast shield and diaphragm perform substantially the same function of directly coupling to the housing with a single push. Indeed, the combined assembly of the breast shield and diaphragm achieves the same result of simplifying the breast pump device assembly by easily removing washable parts from the non-washable housing in a single step. The Momcozy Mobile Flow breast shield and diaphragm work in substantially the same way by allowing

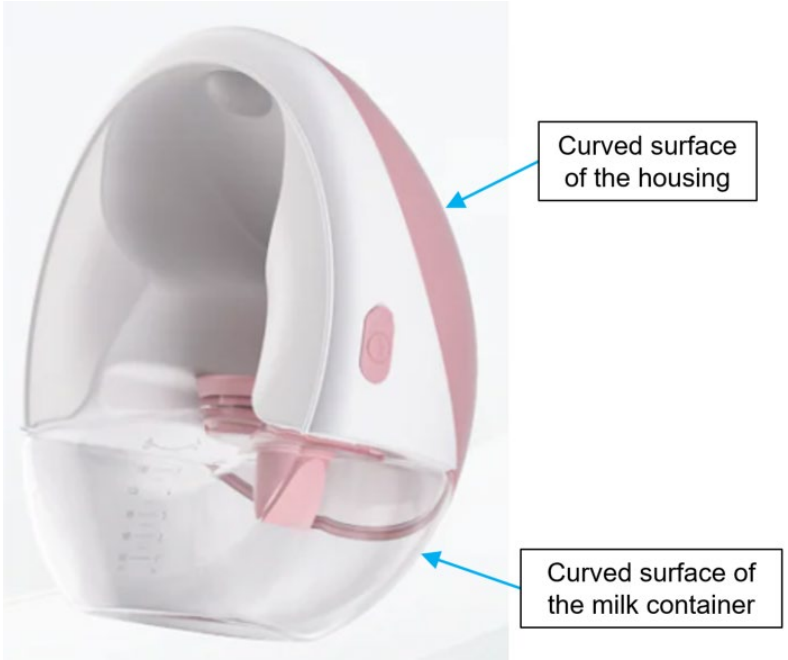
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		the user to assemble the device with a single push or pull to either assemble or disassemble the device. Further, the differences between assembling the breast shield directly to the housing and assembling the breast shield and diaphragm assembly to the housing are insubstantial. Accordingly, Momcozy Mobile Flow’s breast shield and diaphragm assembly are equivalent to the claimed breast shield being directly removable from the housing under the doctrine of equivalents.
14	The breast pump device of claim 1, wherein the diaphragm is a flexible membrane.	*See* claim 1. The Momcozy Mobile Flow includes a diaphragm that is a flexible membrane. Photograph of Momcozy Mobile Flow Membrane.
16	The breast pump device of claim 1,	*See* claim 1. The Momcozy Mobile Flow milk container is substantially rigid.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
	wherein the milk container is substantially rigid.	For example, the Momcozy Mobile Flow includes a “Milk Collector.” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) The milk container is made of a plastic material that is substantially rigid.
17	The breast pump device of claim 1, wherein the milk container is configured to attach to a lower part of the housing and to form a flat bottomed base for the breast pump device.	*See* claim 1. The Momcozy Mobile Flow milk container is configured to attach to a lower part of the housing and to form a flat bottomed base for the breast pump device. The Momcozy Mobile Flow milk container is configured to be attached to and removed from a lower part of the housing, via the breast shield’s connection with the housing. (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		To the extent that the Momcozy Mobile Flow does not literally attach the milk container to a lower part of the housing, this claim is met under the doctrine of equivalents. The Momcozy Mobile Flow’s milk container is configured to attach to a lower part of the housing, via the breast shield’s connection with the housing. This attachment of the milk container performs substantially the same function as the claimed attachment of mounting the milk container below the housing in a compact arrangement. And the attachment between the milk container, breast shield, and housing achieves the same result of positioning the milk container below the housing in a compact arrangement such that the Mobile Flow device can be in-bra wearable. This attachment between the milk container, breast shield, and housing works in substantially the same way using a mechanical attachment configuration to couple the components together with a “click” fit. (*See* Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 18 seconds.) Further, the differences between a milk container that attaches directly to a lower part of a housing and a milk container that attaches to a lower part of a housing via a breast shield, such as in the Momcozy Mobile Flow device, are insubstantial. Accordingly, Momcozy Mobile Flow’s attachment of the milk container to a lower part of the housing is equivalent to the claimed attachment under the doctrine of equivalents.

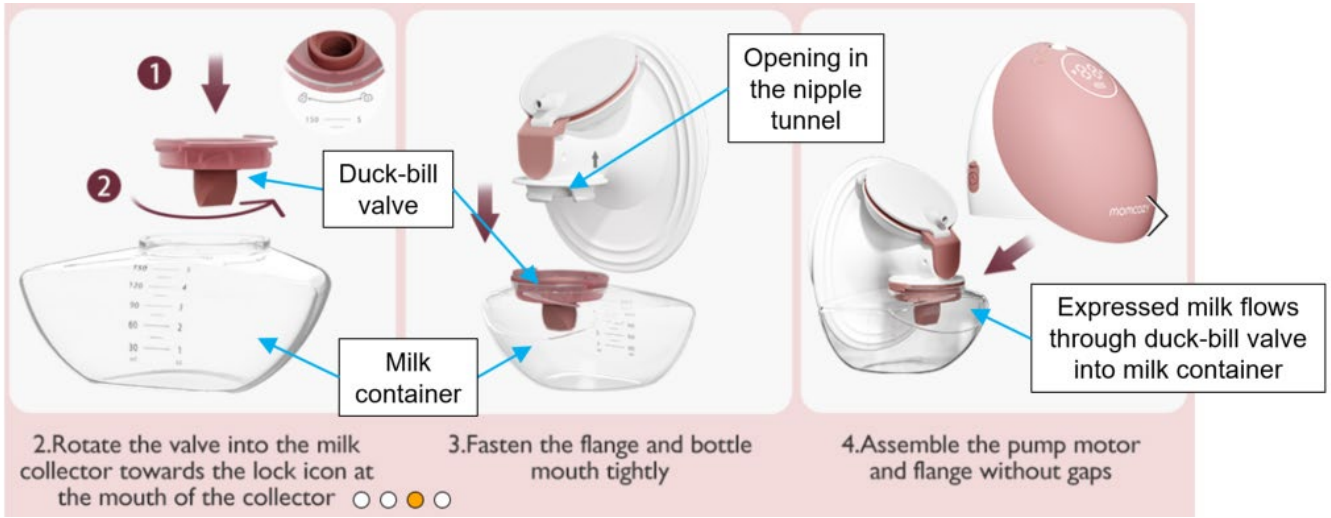
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) The Momcozy Mobile Flow includes “Stackable Milk Collectors” facilitated by the flat bottom base serving as the base of the milk container. (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

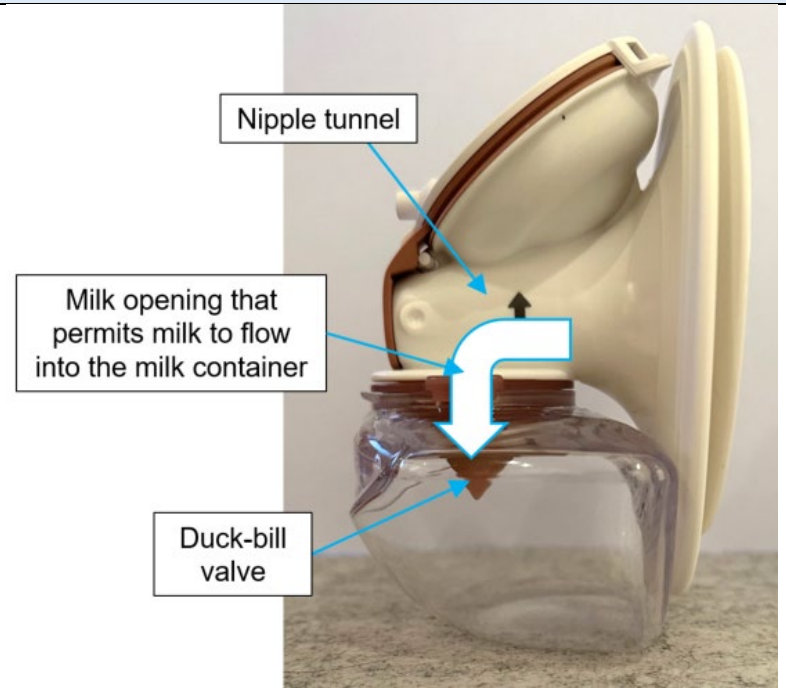
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
18	The breast pump device of claim 1, wherein the milk container has a surface shaped to continue a curved shape of the housing, so that the breast pump device can be held comfortably inside the bra.	*See* claim 1. The Momcozy Mobile Flow milk container has a surface shaped to continue a curved shape of the housing, so that the breast pump device can be held comfortably inside the bra.  (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

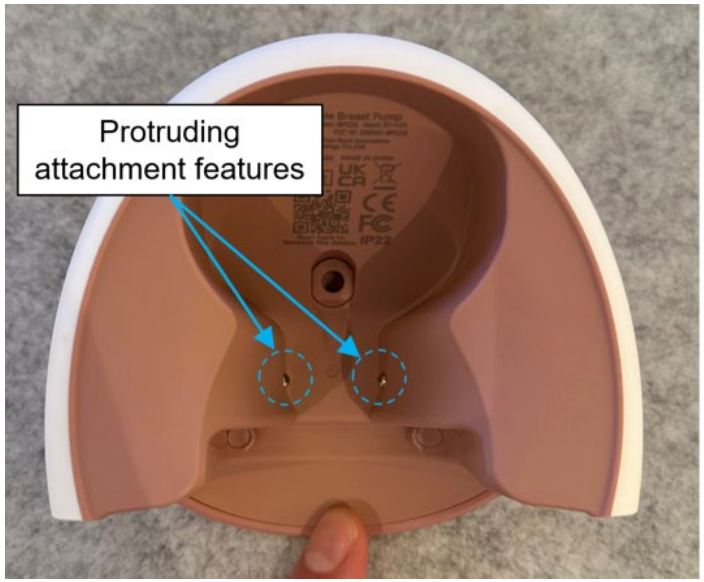
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
19	The breast pump device of claim 1, wherein the milk container includes a flexible valve that self-seals under negative air pressure against a milk opening in the nipple tunnel and that permits milk to flow into the milk container.	*See* claim 1. The Momcozy Mobile Flow milk container includes a flexible valve that self-seals under negative air pressure against a milk opening in the nipple tunnel and that permits milk to flow into the milk container. The Momcozy Mobile Flow device is supplied with two “Duckbill Valve[s].” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		As shown below, expressed milk flows under gravity through an opening in the nipple tunnel and into the milk container through the duck-bill valve. On information and belief, the duck-bill valve stays sealed when there is negative air pressure being applied by the pump to ensure that negative air pressure is not applied to the milk container.  (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Annotated photograph of Momcozy Mobile Flow device.

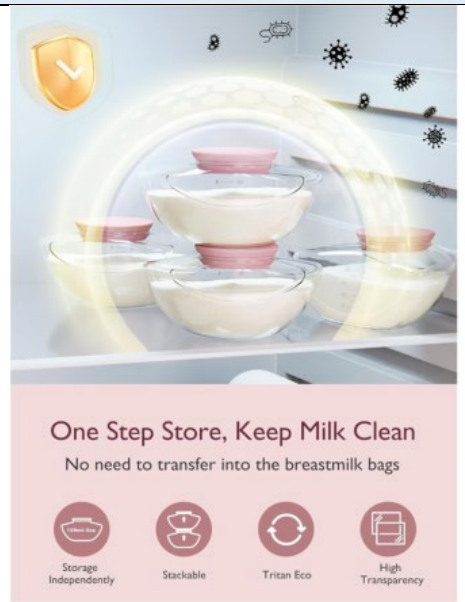
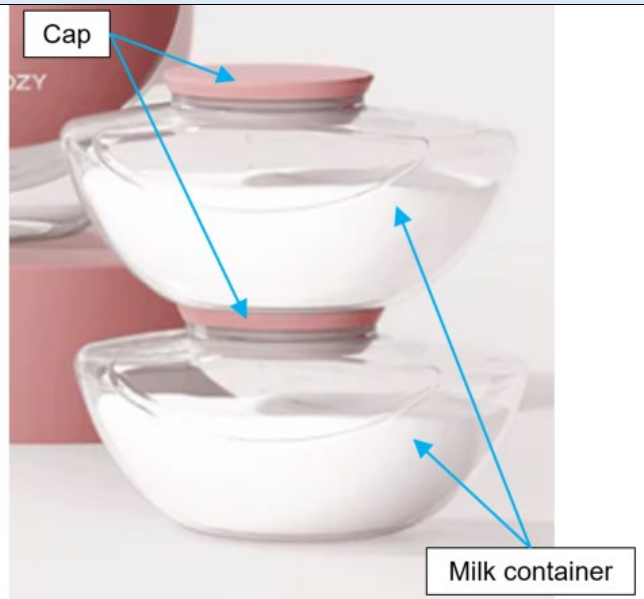
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
20	The breast pump device of claim 1, wherein the milk container is attachable to the housing with a mechanical or magnetic mechanism that releasably attaches or latches when the milk container is sufficiently pressed on to the housing with a single push action.	*See* claim 1. The Momcozy Mobile Flow milk container is attachable to the housing with a mechanical or magnetic mechanism that releasably attaches or latches when the milk container is sufficiently pressed on to the housing with a single push action. The Momcozy Mobile Flow housing, and breast shield, attach to the housing with a mechanical mechanism. As shown below, the housing include a pair of protruding bearings that engage with recesses on the breast shield, which is attached to the milk container.

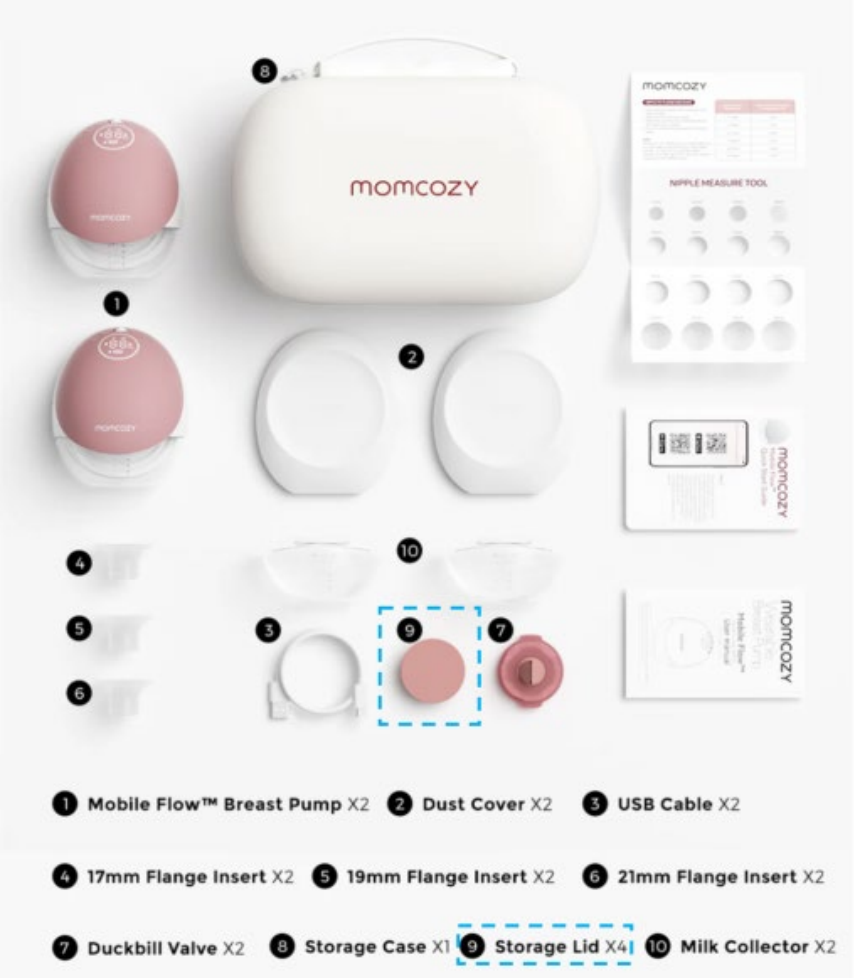
		 (Annotated photographs of Momcozy Mobile Flow device; https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) The Momcozy "How to Use Mobile Flow" video instructs a user to "assemble to the pump motor and the flange tightly," and shows a single push action to assemble the parts. The video further shows that when connected properly, the mechanical mechanism "clicks" into place.

Momcozy "How to Use Mobile Flow™ Hands-free Breast Pump" video (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 18 seconds.)

To the extent that the Momcozy Mobile Flow does not literally attach the milk container to the housing with a mechanical mechanism, this claim is met under the doctrine of equivalents. The Momcozy Mobile Flow's milk container is configured to attach to the housing, via the breast shield's connection with the housing that uses a mechanical mechanism. This attachment of the milk container performs substantially the same function as the claimed attachment of mounting the milk container relative to the housing in a compact arrangement and with a single push action securing mechanism. The attachment between the milk container, breast shield, and housing achieves the same result of securing the milk container relative to the housing such that the milk container does not slip away from or fall out of the housing. This attachment between the milk container, breast shield, and housing works in substantially the same way using a mechanical attachment configuration to couple the components together with a "click" fit. (*See* Momcozy

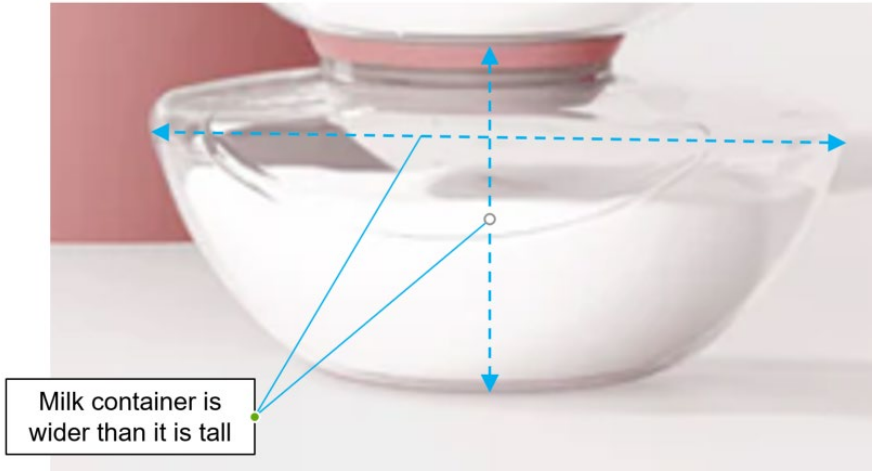
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the '893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		"How to Use Mobile Flow™ Hands-free Breast Pump" video, https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 18 seconds.) Further, the differences between a milk container that attaches directly to a housing and a milk container that attaches to a housing via a breast shield, such as in the Momcozy Mobile Flow device, are insubstantial. Accordingly, Momcozy Mobile Flow's attachment of the milk container to the housing is equivalent to the claimed attachment under the doctrine of equivalents.
21	The breast pump device of claim 1, wherein the milk container includes a cap that is removable from the milk container and a removable valve that enables milk to pass into the milk container in one direction.	*See* claims 1 and 19. The Momcozy Mobile Flow milk container includes a cap that is removable from the milk container and a removable valve that enables milk to pass into the milk container in one direction. The Momcozy Mobile Flow device includes a "silicone lid" that seals the milk container. (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) Momcozy states that the milk container and cap provide "Convenient Storage," and that a user can "[j]ust seal with the silicone lid and put it in the bag or refrigerator. No need to transfer into the breastmilk bags. One Step Store, Keep Milk Clean." (*Id.*)

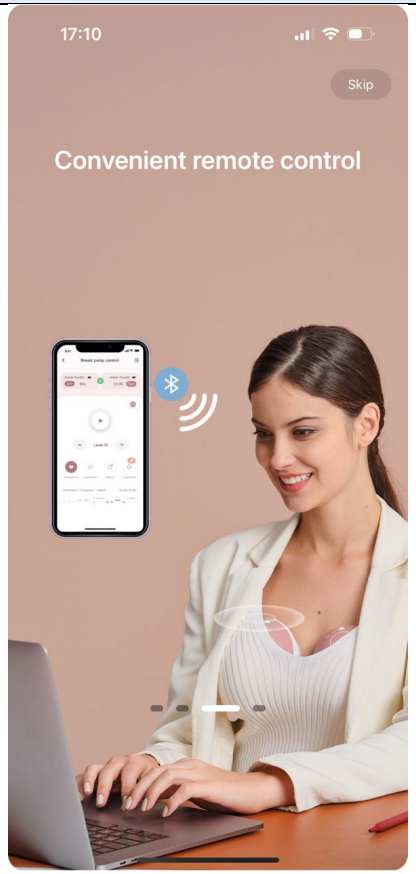
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		  (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp; https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

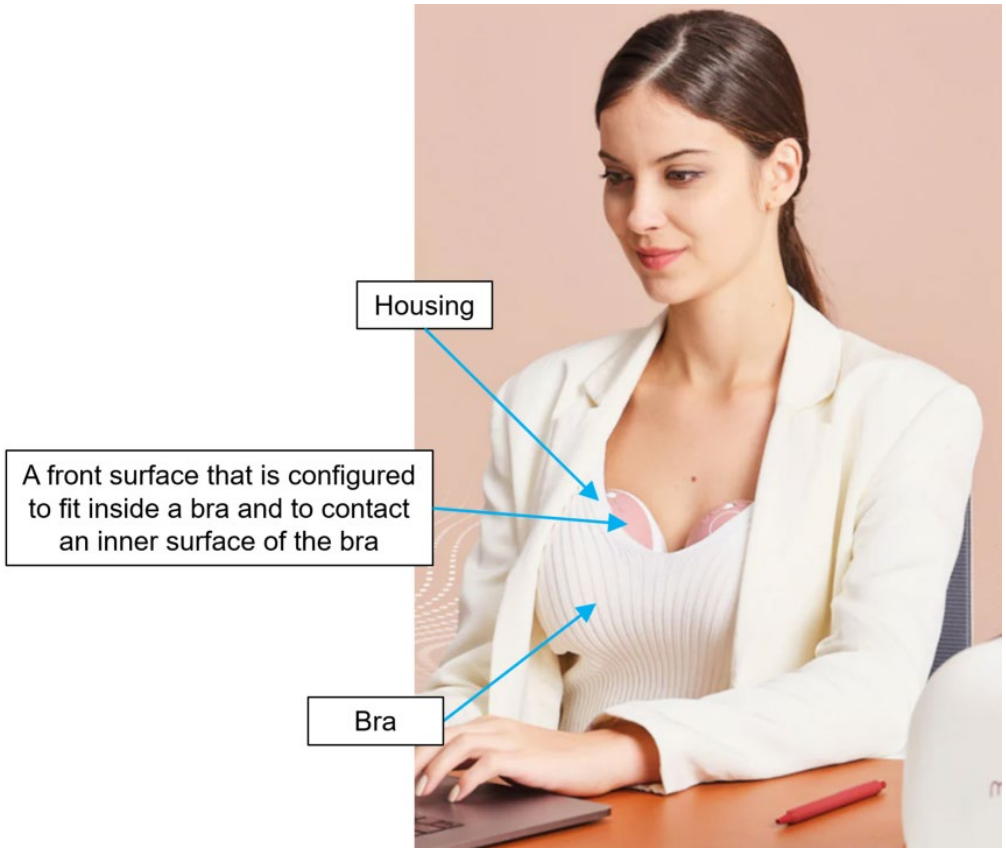
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

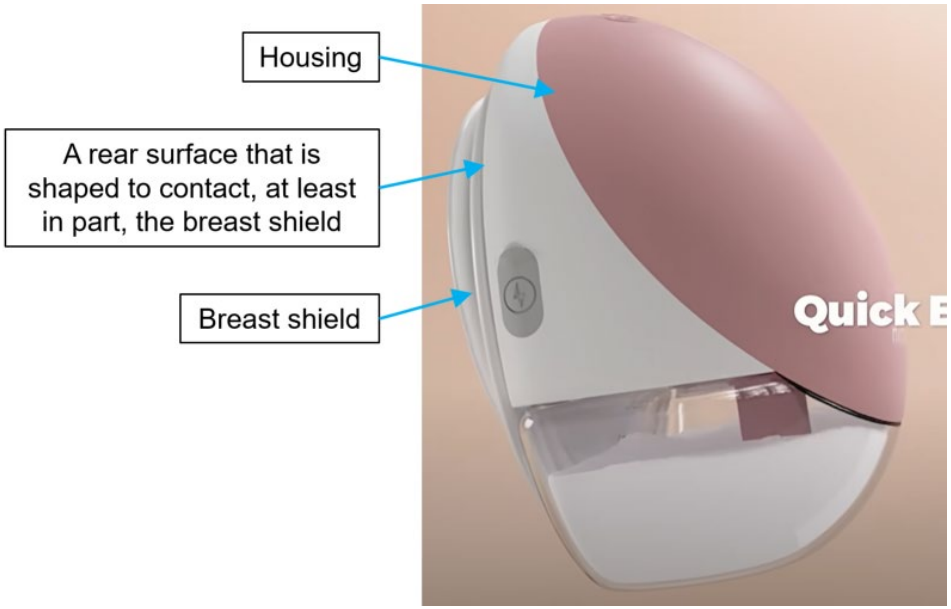
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		As shown in Momcozy’s “How to Use Mobile Flow” video, the Momcozy Mobile Flow device includes a removable valve that enable milk to pass into the milk container. On information and belief, the removable valve enables milk to pass into the milk container in one direction. Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 3 minutes 0 seconds.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
23	The breast pump device of claim 1, wherein the milk container is wider than the milk container is tall.	*See* claim 1. The Momcozy Mobile Flow milk container is wider than the milk container is tall.  (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)
24	The breast pump device of claim 1, wherein the housing includes a wireless data communications system powered by the battery.	*See* claim 1. The Momcozy Mobile Flow housing includes a wireless data communications system powered by the battery. The Momcozy Mobile Flow device is wirelessly controlled via an app. “Smart Pumping: Control the Mobile Flow via the "Momcozy" app to start/pause/countdown pumping and switch to different pumping settings. No need to reach into your bra! Record every breastmilk yield to track your pumping history. Know yourself better, Pump on your terms.” (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Momcozy App, Quick Start Guide. On information and belief, the Momcozy Mobile Flow’s wireless data communications system is powered by the battery.

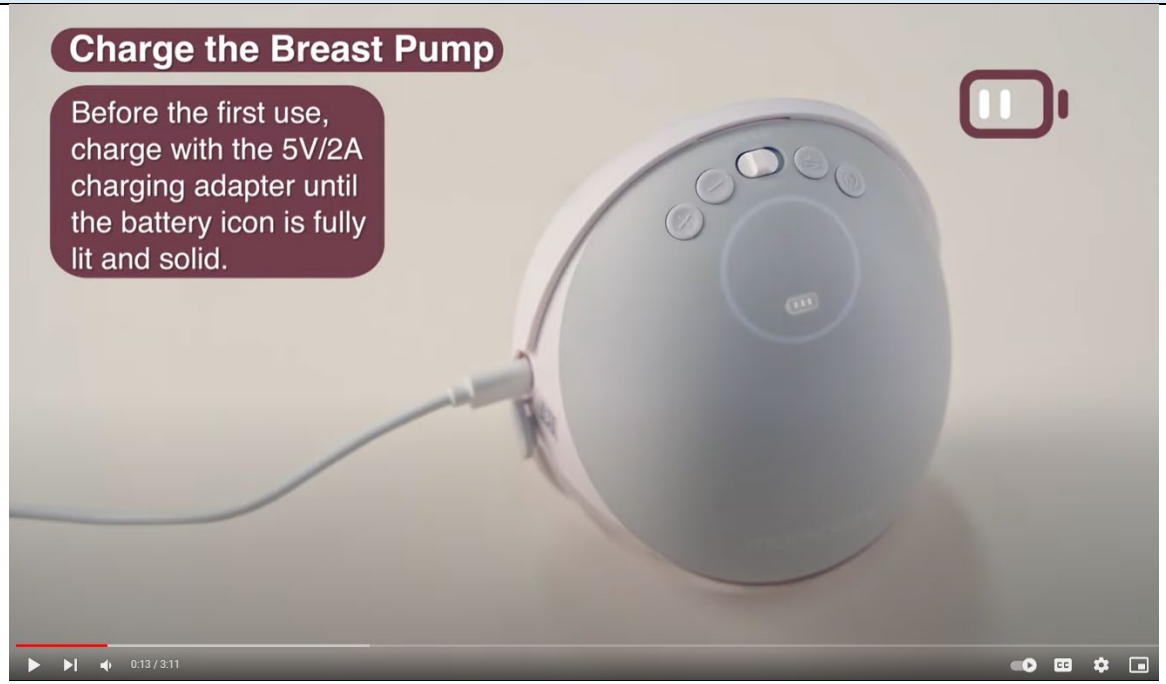
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
25	The breast pump device of claim 1, wherein the housing has a front surface that is configured to fit inside a bra and to contact an inner surface of the bra, and a rear surface that is shaped to contact, at least in part, the breast shield.	*See* claim 1. The Momcozy Mobile Flow housing has a front surface that is configured to fit inside a bra and to contact an inner surface of the bra, and a rear surface that is shaped to contact, at least in part, the breast shield.  (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Momcozy “Momcozy Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=UPKrZCbAkHI, at 48 seconds.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
26	The breast pump device of claim 1, wherein the housing includes at least one of a visual or haptic indicator that indicates whether milk is flowing or not flowing into the milk container.	*See* claim 1. The Momcozy Mobile Flow housing includes at least one of a visual or haptic indicator that indicates whether milk is flowing or not flowing into the milk container. (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) As shown above, the Momcozy Mobile Flow includes an LED display. The LED display indicates a milk overflow condition and which mode the device is in when expression milk.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		Battery Indicator ❶ Battery Display ❷ Milk Overflow Reminder ❸ Long Press: Turn On / Off Short Press: Pause/ Continue ❹ Mode Selection ❺ Switching Direction ❻ Bluetooth Indicator ❼ Running Time / Suction Level Display ❽ Mode Indicator ❾ Increase / Decrease (Momcozy Mobile Flow Quick Start Guide, p. 6.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
28	The breast pump device of claim 1, wherein the battery is a rechargeable battery, and the housing further includes: a power charging circuit for controlling the charging of the rechargeable battery, and control electronics powered by the rechargeable battery.	*See* claim 1. The Momcozy Mobile Flow includes a battery that is a rechargeable battery, and the housing further includes a power charging circuit for controlling the charging of the rechargeable battery, and control electronics powered by the rechargeable battery. The Momcozy Mobile Flow housing includes a rechargeable battery. For example, Momcozy states that the Mobile Flow device includes a 1800mAh battery capable of “6 sessions per charge,” “150 minutes of usage,” and a “[c]harge time [of] approx. 2.5 hours.” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) Further, Momcozy instructs users “[b]efore the first use, charge with the 5V/2A charging adapter until the battery icon is fully lit and solid.” (Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, https://www.youtube.com/watch?v=E_V1cCRB6gY, at 13 seconds.) The Mobile Flow device includes a USB type-cable and USB socket, as shown below, for charging the device.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-3, 7-14, 16-21, 23-26, and 28 of the ’893 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 13 seconds.) On information and belief, the Momcozy Mobile Flow pump housing includes a power charging circuit for controlling charging of the rechargeable battery and control electronics powered by the rechargeable battery because the Momcozy Mobile Flow is rechargeable and it has buttons that change the operation of the pump.

Pursuant to Local Patent Rule 120(a), Elvie restates herein that it asserts claims 1-13, 15-24, 26-39 and 41-46 of the ’380 patent. For the reasons stated below, Momcozy’s activities in connection with the manufacture, use, sale, offer for sale, and/or importation of the Momcozy Mobile Flow device will constitute infringement under 35 U.S.C. §§ 271(a), (b), and (c) of the asserted claims.

Pursuant to Local Patent Rule 120(b), Elvie specifically identifies the Momcozy Mobile Flow device as the “Accused Device.” The Momcozy Mobile Flow device contains each and every limitation of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 patent literally or under the doctrine of equivalents, and thus infringe those asserted claims as set forth herein.

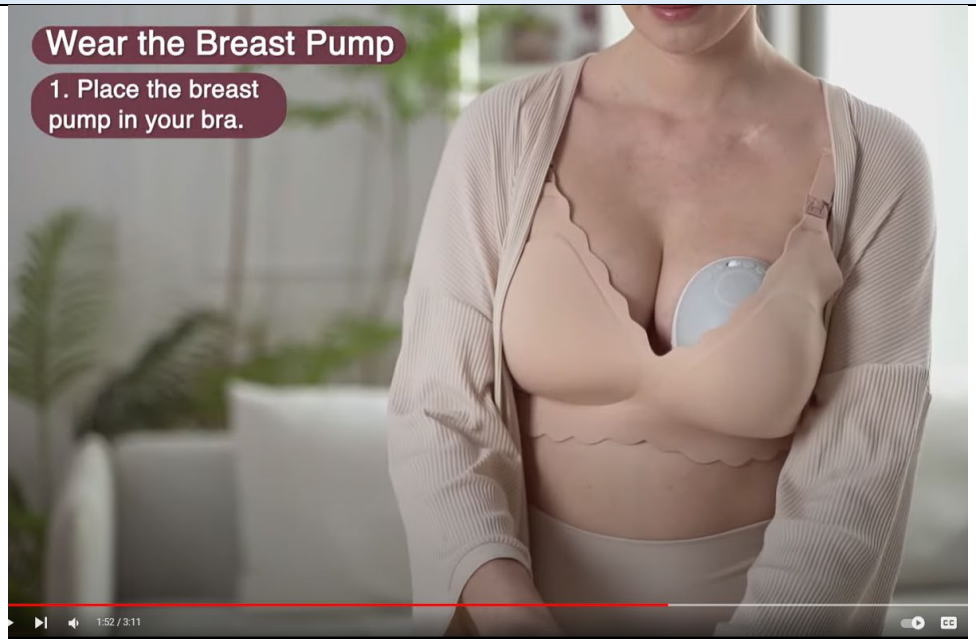
Pursuant to Local Patent Rule 120(c)–(e), Elvie submits the following claim chart identifying specifically where each limitation of each asserted claim is found within the Accused Device either directly, literally or under the doctrine of equivalents, or indirectly. Elvie reserves the right to modify and/or supplement the claim chart herein where appropriate as discovery progresses. In the event that a claim limitation is deemed to be missing under a literal infringement analysis, Elvie reserves the right to demonstrate the presence of a substantial equivalent of such an element and to pursue infringement under the doctrine of equivalents.

Pursuant to Local Patent Rule 120(f), Elvie states that each asserted claim of the ’380 patent is entitled to a priority date that is no later than June 15, 2017.

Elvie reserves the right to base its infringement case on additional information in Momcozy’s production, deposition testimonies, interrogatory responses, responses to requests for admission, and/or any other pleadings, as well as expert testing and/or testimony. In particular, Elvie reserves the right to modify and/or supplement the theories disclosed herein in view of any additional evidence regarding infringement.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the '380 Patent.		
Claim Language		**Momcozy Mobile Flow**
1.P	A breast pump device comprising:	The Momcozy Mobile Flow is a breast pump device. The Momcozy Mobile Flow is described as a "Hands-Free Breast Pump." (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)
1.1	a self-contained, in-bra wearable device comprising:	The Momcozy Mobile Flow is a self-contained, in-bra wearable device. The Momcozy Mobile Flow is advertised as a "Wearable Breast Pump." (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) The Momcozy Mobile Flow is an in-bra wearable device.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) As shown above, the Momcozy Mobile Flow fits inside a user’s bra. Momcozy’s Amazon listing describes the Momcozy Mobile Flow as “More Fit & Discreet: Mobile Flow breast pump adopts DoubleFit Flange combining soft and hard silicone to ensure better comfort and safety. The drop-shaped design of the M9 breast pump fits seamlessly in the pump bra, allowing moms to pump with total privacy.” (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) Momcozy further instructs users to “place the breast pump in your bra.”

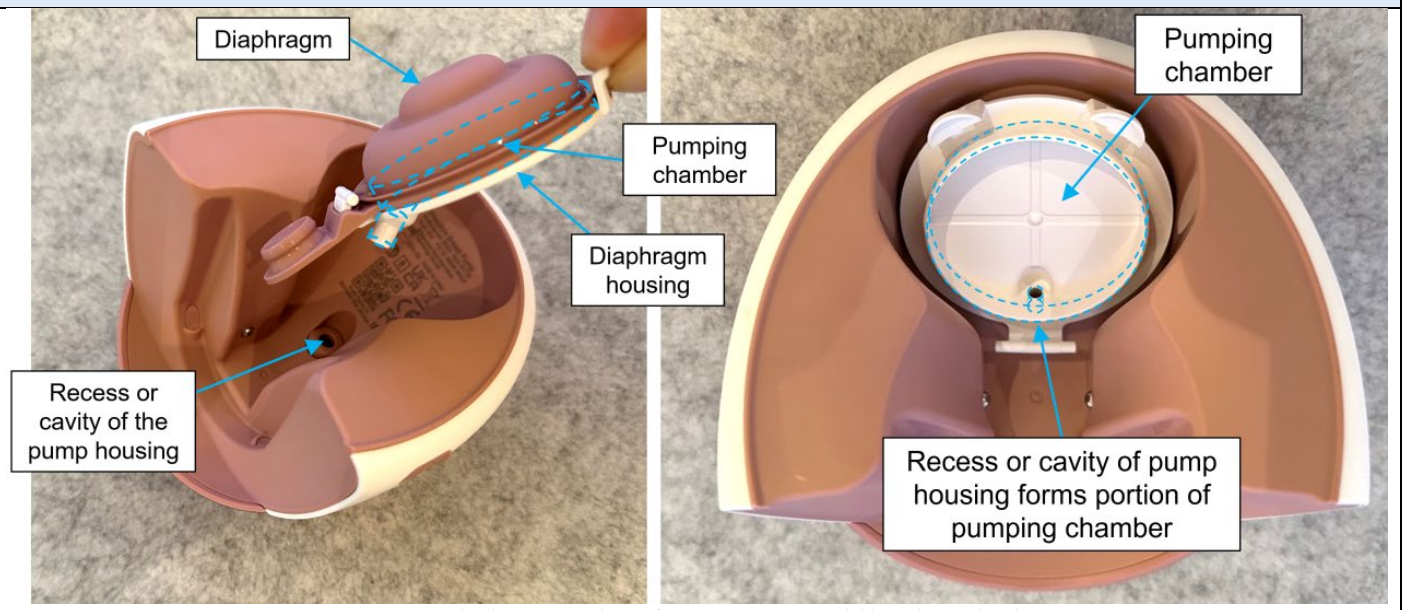
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 52 seconds.)
1.2	a pump housing that includes: a rechargeable battery,	The Momcozy Mobile Flow includes a pump housing that includes a rechargeable battery, a power charging circuit for controlling charging of the rechargeable battery, control electronics powered by the rechargeable battery, a pump powered by the rechargeable battery and configured to generate negative air pressure, and a USB charging socket for transferring power to the power charging circuit and the rechargeable battery.

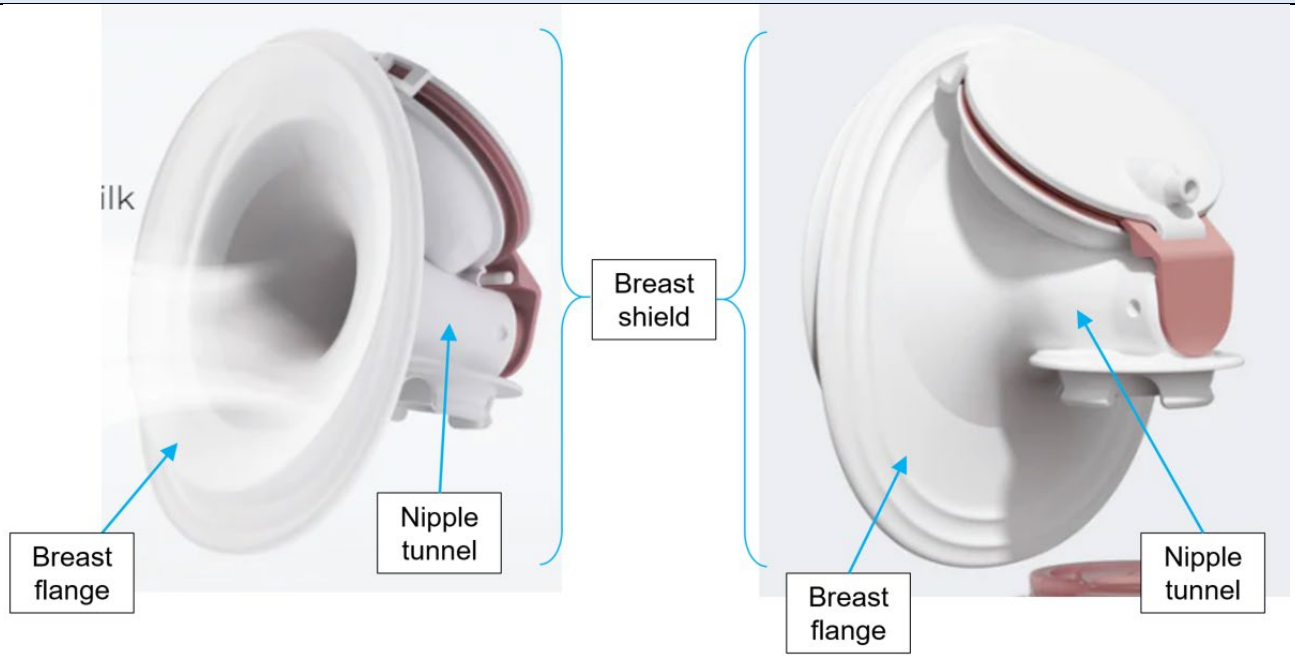
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the '380 Patent.		
Claim Language		**Momcozy Mobile Flow**
	a power charging circuit for controlling charging of the rechargeable battery, control electronics powered by the rechargeable battery, a pump powered by the rechargeable battery and configured to generate negative air pressure,	 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) The Momcozy Mobile Flow housing includes a rechargeable battery. For example, Momcozy states that the Mobile Flow device includes a 1800mAh battery capable of "6 sessions per charge," "150 minutes of usage," and a "[c]harge time [of] approx. 2.5 hours." (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) Further, Momcozy instructs users "[b]efore the first use, charge with the 5V/2A charging adapter until the battery icon is fully lit and solid." (Momcozy "How to Use Mobile Flow™ Hands-free Breast Pump" video, https://www.youtube.com/watch?v=E_V1cCRB6gY, at 13 seconds.) The Mobile Flow device includes a USB type-cable and USB socket, as shown below, for charging the device.

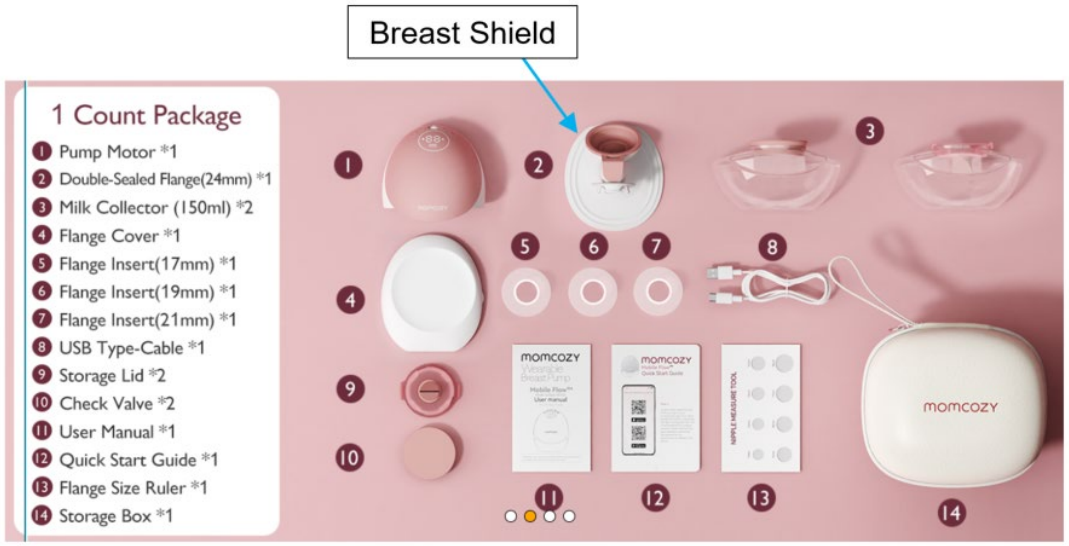
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the '380 Patent.		
Claim Language		**Momcozy Mobile Flow**
	a Universal Serial Bus (USB) charging socket for transferring power to the power charging circuit and the rechargeable battery, and a recess or cavity that defines a pumping chamber;	 Momcozy "How to Use Mobile Flow™ Hands-free Breast Pump" video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 13 seconds.) On information and belief, the Momcozy Mobile Flow pump housing includes a power charging circuit for controlling charging of the rechargeable battery and control electronics powered by the rechargeable battery because the Momcozy Mobile Flow is rechargeable and it has buttons that change the operation of the pump. As shown below, the Momcozy Mobile Flow housing includes a pump powered by the rechargeable battery and configured to generate negative air pressure. Momcozy states that "[t]he 3rd-gen pump motor offers powerful suction up to -300mmHg to increase milk output," and has "15 intensities [for] customizable settings for maximum comfort and milk flow." (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.) As shown below, pump housing includes a recess or cavity that defines a portion of a pumping chamber.

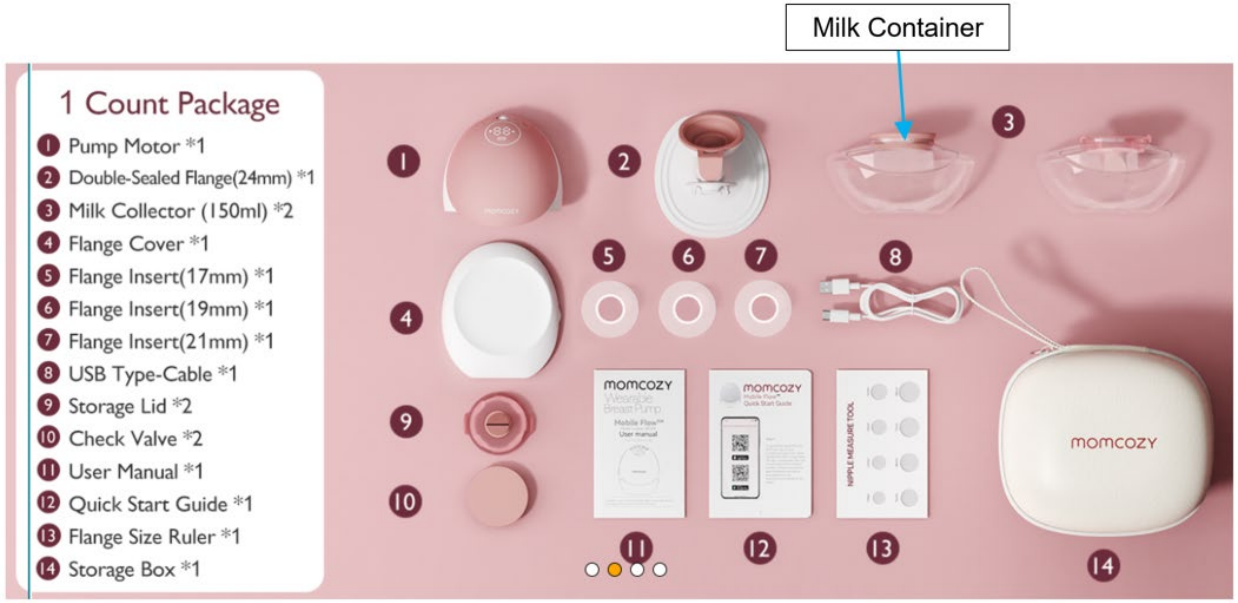
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Annotated photograph of Momcozy Mobile Flow device.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Annotated photographs of Momcozy Mobile Flow device.
1.3	a breast shield made up of a breast flange and a nipple tunnel;	The Momcozy Mobile Flow includes a breast shield that includes a breast flange and a nipple tunnel.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) The Momcozy Mobile Flow includes a “Double-sealed flange (24mm).” (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

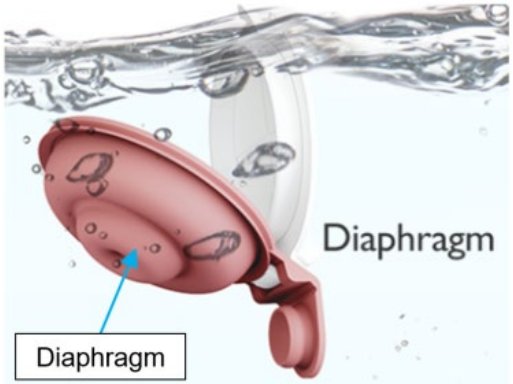
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

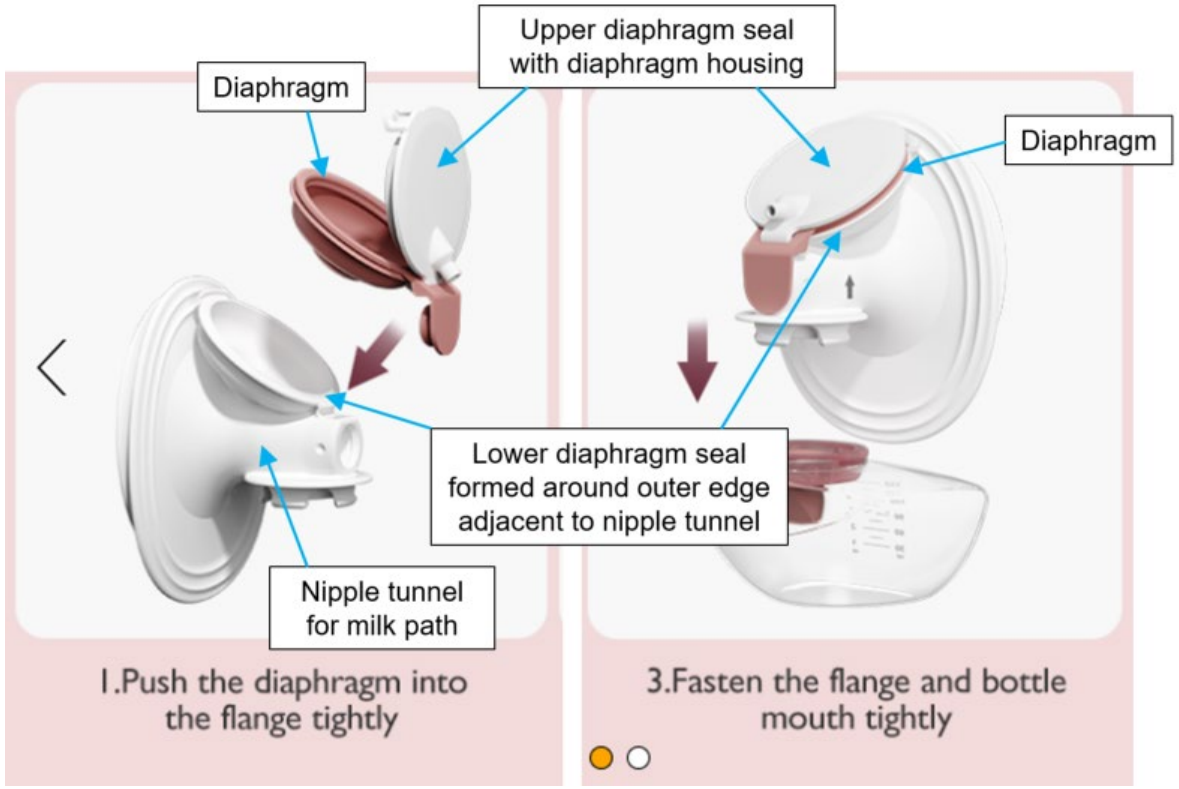
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
1.4	a milk container that is configured to be attached to and removed from the pump housing; and	The Momcozy Mobile Flow includes a milk container that is configured to be attached to and removed from the housing. Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 3 minutes 5 seconds.) The Momcozy website indicates that the Mobile Flow has a “bottle capacity: 150ml.” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

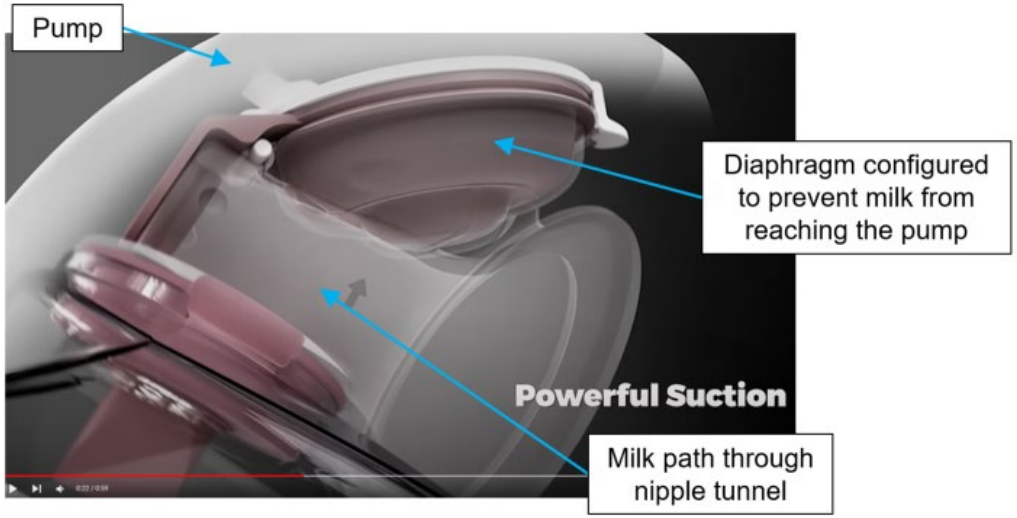
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) The Momcozy Mobile Flow milk container is configured to be attached to and removed from the housing, via the breast shield’s connection with the housing.

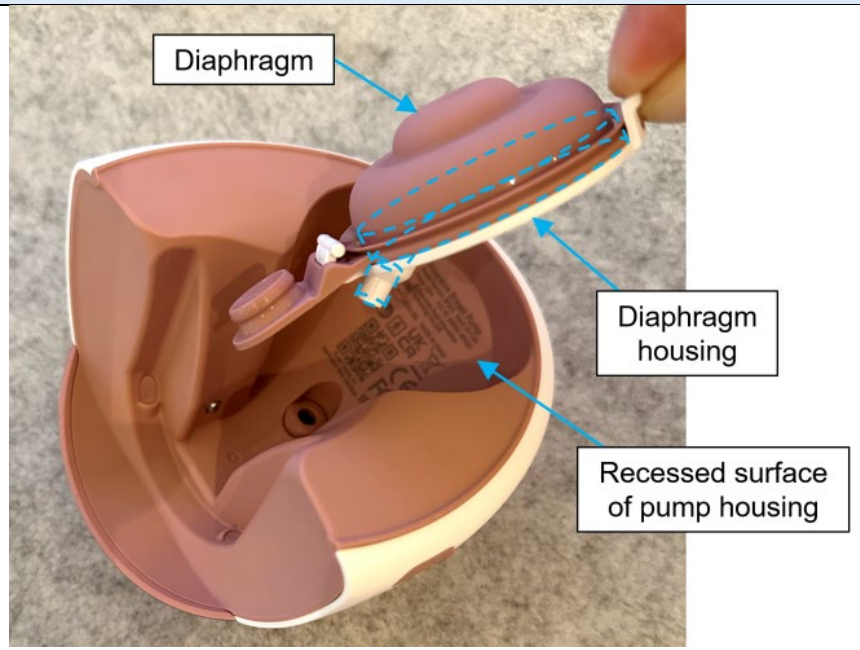
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump; https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) To the extent that the Momcozy Mobile Flow does not literally attach the milk container to the housing, this claim is met under the doctrine of equivalents. The Momcozy Mobile Flow’s milk container is configured to attach to the housing, via the breast shield’s connection with the housing. This attachment of the milk container performs substantially the same function as the claimed attachment of mounting the milk container relative to the housing in a compact arrangement. The attachment between the milk container, breast shield, and housing

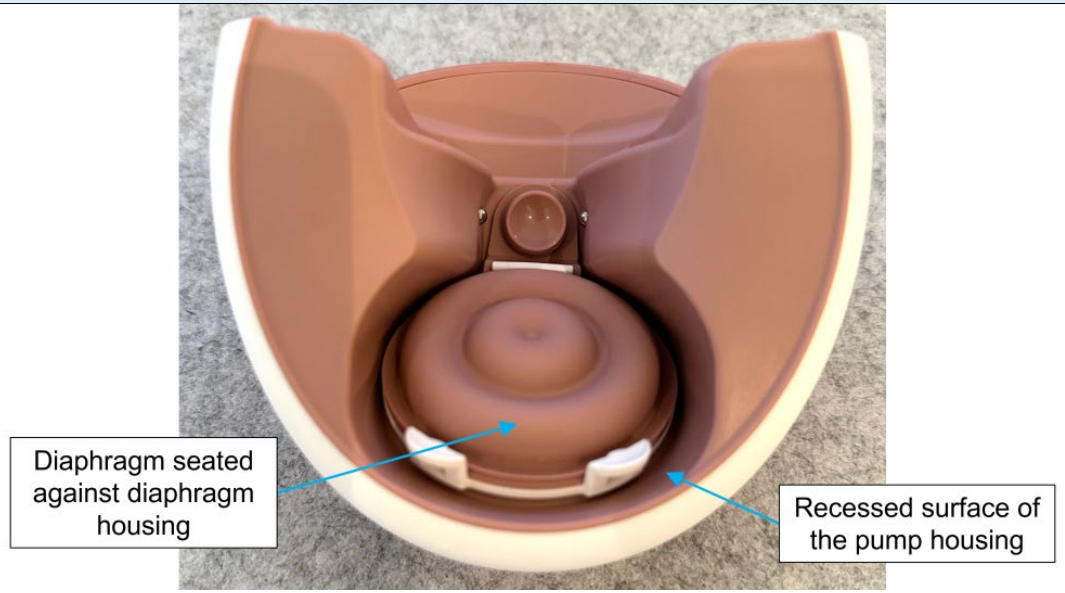
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		achieves the same result of positioning the milk container and housing in a compact arrangement such that the Mobile Flow device can be in-bra wearable. This attachment between the milk container, breast shield, and housing works in substantially the same way using a mechanical attachment configuration to couple the components together with a “click” fit. (*See* Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 18 seconds.) Further, the differences between a milk container that attaches directly to a housing and a milk container that attaches to a housing via a breast shield, such as in the Momcozy Mobile Flow device, are insubstantial. Accordingly, Momcozy Mobile Flow’s attachment of the milk container to the housing is equivalent to the claimed attachment under the doctrine of equivalents.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
1.5	a diaphragm that is configured to prevent milk from reaching the pump, the diaphragm being seated against a diaphragm housing that is fixed to a recessed surface of the pump housing, and the diaphragm being a membrane that deforms in response to changes in air pressure caused by the pump to create negative air pressure in the nipple tunnel.	The Momcozy Mobile Flow includes a diaphragm that is configured to prevent milk from reaching the pump, the diaphragm being seated against a diaphragm housing that is fixed to a recessed surface of the pump housing, and the diaphragm being a membrane that deforms in response to changes in air pressure caused by the pump to create negative air pressure in the nipple tunnel. Momcozy Mobile Flow includes a diaphragm configured to prevent milk from reaching the pump.  (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.) The diaphragm seals on a lower side to a housing adjacent to the nipple tunnel, and seals on an upper side with a diaphragm housing as shown below.

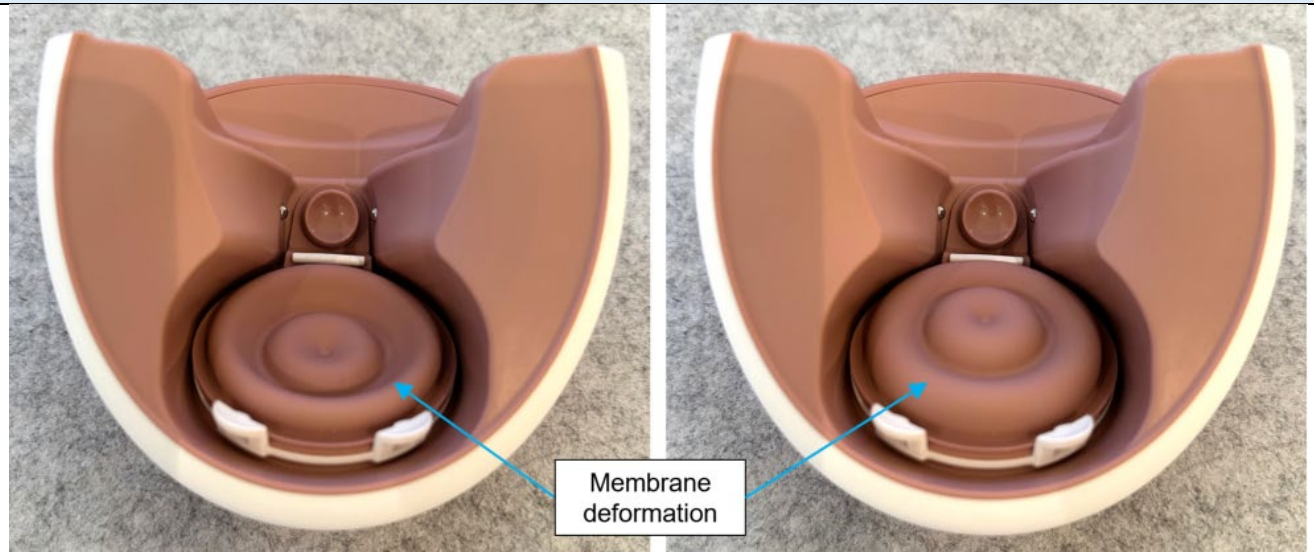
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.) When milk is expressed through the nipple tunnel, the diaphragm blocks any path between the nipple tunnel, where milk is initially received, to the pump, thereby preventing milk from reaching the pump. The outer edge

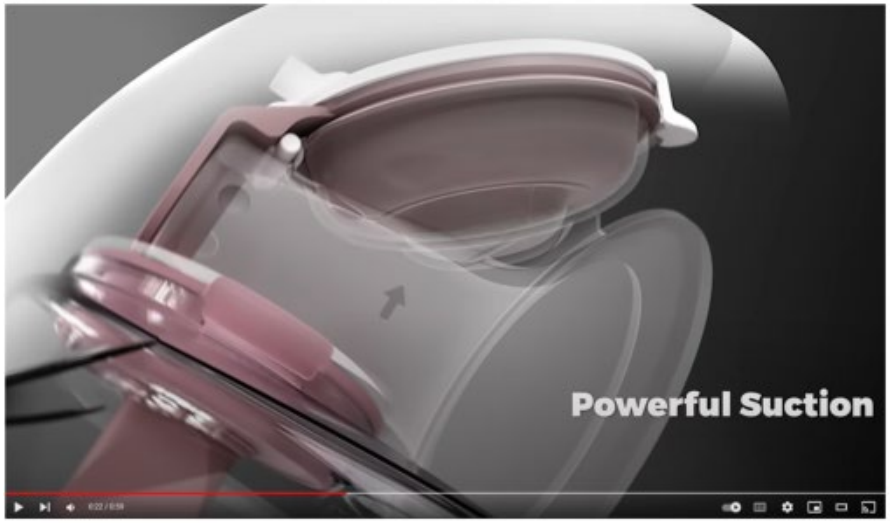
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		of the diaphragm creates a seal to prevent the milk from entering the air pump when the pump is fully assembled.  “Momcozy Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=UPKrZCbAkHI, at 22 seconds.) As shown below, the diaphragm is configured to be seated against the diaphragm housing that is fixed to a recessed surface of the pump housing.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Annotated photograph of Momcozy Mobile Flow device.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Annotated photographs of Momcozy Mobile Flow device. As shown below, the Momcozy Mobile Flow’s diaphragm is a membrane.

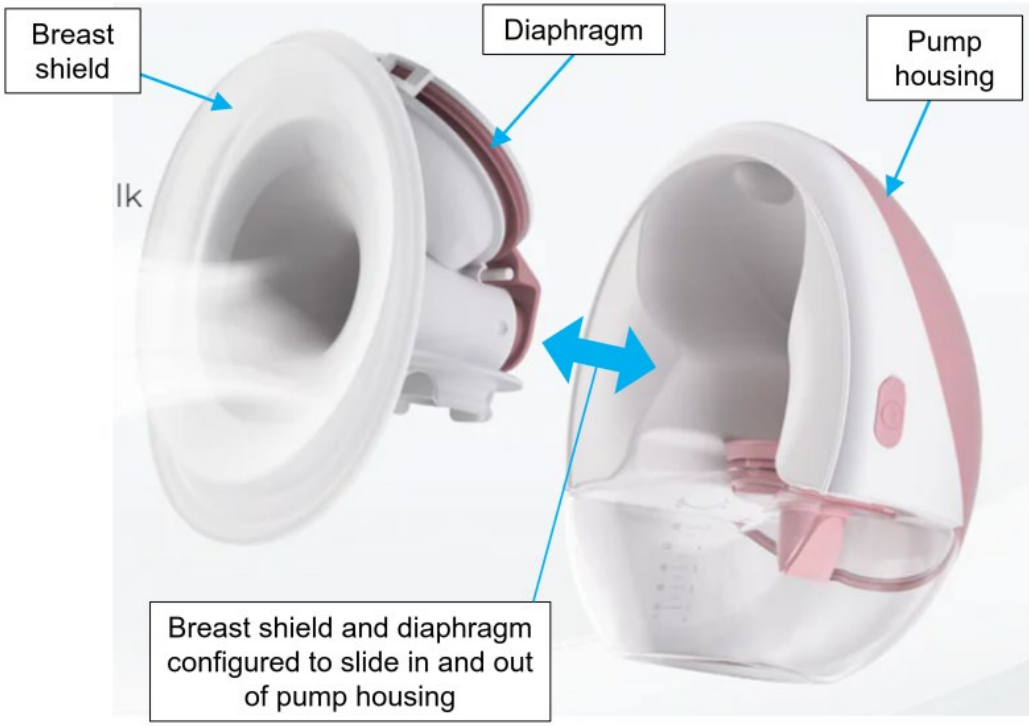
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Photograph of Momcozy Mobile Flow diaphragm. The Momcozy Mobile Flow’s diaphragm is a membrane that deforms in response to changes in air pressure caused by the pump to create negative air pressure in the nipple tunnel. The Momcozy Mobile Flow device includes 15 “adjustable suction levels,” and generates a “vacuum: -300mmHg.” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) As cyclic negative pressure is generated by the pump, the membrane deforms to create negative air pressure in the nipple tunnel. (*See* https://www.youtube.com/watch?v=UPKrZCbAkHI, at 22-24 seconds, showing deformation of the membrane in response to changes in air pressure caused by the pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Annotated photographs of Mobile Flow device.

		   "Momcozy Mobile Flow™ Hands-free Breast Pump" video, (https://www.youtube.com/watch?v=UPKrZCbAkHI, at 22-24 seconds.)
2	The breast pump device of	*See* claims 1 and 30. The Momcozy Mobile Flow's breast shield is configured to rotate smoothly around a nipple inserted into the nipple tunnel to provide a correct positioning of the breast shield onto a breast.

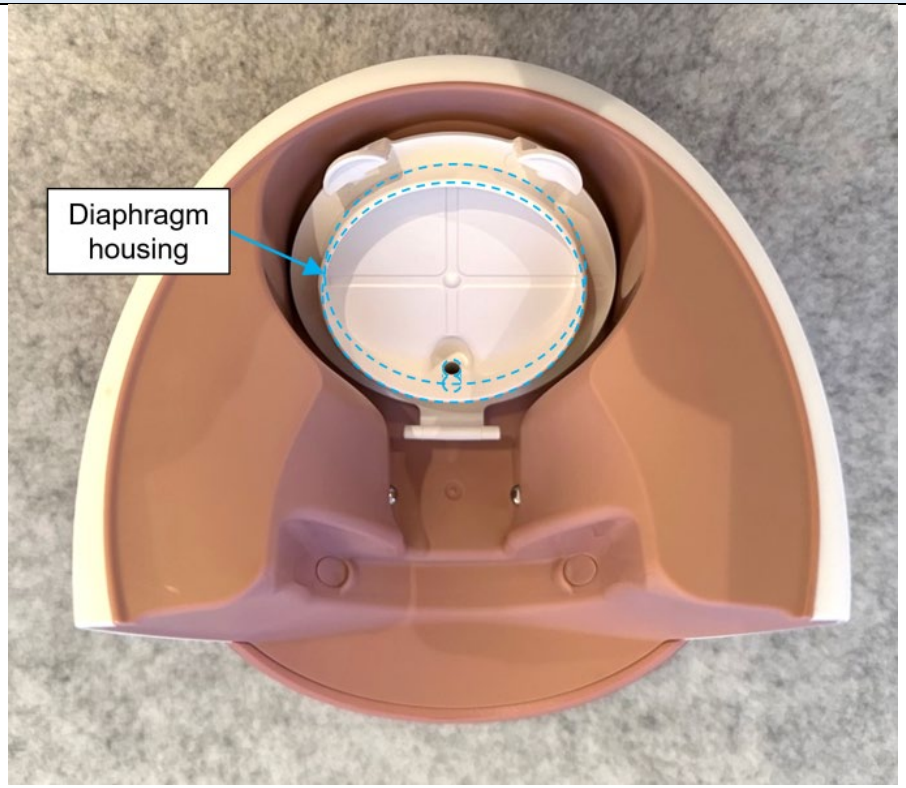
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
	claim 1, wherein the breast shield is configured to rotate smoothly around a nipple inserted into the nipple tunnel to provide a correct positioning of the breast shield onto a breast.	
3	The breast pump device of claim 1, wherein the breast shield is a one piece item that in use presents a single continuous surface to a nipple and a breast.	*See* claims 1 and 31. The Momcozy Mobile Flow’s breast shield is a one piece item that in use presents a single continuous surface to a nipple and a breast.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
4	The breast pump device of claim 1, wherein the breast shield has a top and bottom when positioned upright for normal use, and wherein the breast shield is generally symmetrical about a center-line running from the top to the bottom of the breast shield when positioned upright for normal use.	*See* claims 1 and 32. The Momcozy Mobile Flow’s breast shield has a top and bottom when positioned upright for normal use, and the breast shield is generally symmetrical about a center-line running from the top to the bottom of the breast shield when positioned upright for normal use.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
5	The breast pump device of claim 1, wherein the breast shield is configured to slide in and out from the pump housing, together with the diaphragm that prevents milk from reaching the pump.	*See* claim 1. The Momcozy Mobile Flow’s breast shield is configured to slide in and out from the pump housing, together with the diaphragm that prevents milk from reaching the pump. As shown below, the Momcozy Mobile Flow’s housing is configured to slide onto the breast shield. The Momcozy Mobile Flow advertising material instructs a user to “assemble the pump motor and flange without gaps.” (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.) 

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		(https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) The sliding attachment of the breast shield and diaphragm with the housing is shown in the Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, screen shot reproduced below. Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 15 seconds.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
6	The breast pump device of claim 1, wherein the breast pump device includes only the breast shield and the milk container that are directly removable from the pump housing in normal use or normal dis-assembly.	*See* claims 1 and 33. The Momcozy Mobile Flow includes only the breast shield and the milk container that are directly removable from the pump housing in normal use or normal disassembly.
7	The breast pump device of claim 1, wherein the diaphragm is substantially circular and the diaphragm housing is substantially circular.	*See* claims 1, 34, and 42. The Momcozy Mobile Flow’s diaphragm is substantially circular and the diaphragm housing is substantially circular. As shown below, the Momcozy Mobile Flow diaphragm housing is substantially circular.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Annotated photograph of Momcozy Mobile Flow device.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
8	The breast pump device of claim 1, wherein the milk container is substantially rigid.	*See* claims 1 and 35. The Momcozy Mobile Flow’s milk container is substantially rigid.
9	The breast pump device of claim 1, wherein the milk container is configured to attach to a lower part of the pump housing and to form a flat bottomed base for the breast pump device.	*See* claim 1. The Momcozy Mobile Flow’s milk container is configured to attach to a lower part of the pump housing and to form a flat bottomed base for the breast pump device. The Momcozy Mobile Flow milk container is configured to be attached to and removed from a lower part of the housing, via the breast shield’s connection with the housing.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) To the extent that the Momcozy Mobile Flow does not literally attach the milk container to a lower part of the pump housing, this claim is met under the doctrine of equivalents. The Momcozy Mobile Flow’s milk container is configured to attach to a lower part of the pump housing, via the breast shield’s connection with the pump housing. This attachment of the milk container performs substantially the same function as the claimed attachment of mounting the milk container below the pump housing in a compact arrangement. The attachment between the milk container, breast shield, and pump housing achieves the same result of positioning the milk container below the pump housing in a compact arrangement such that the Mobile Flow device can be in-bra wearable. This attachment between the milk container, breast shield, and pump housing works in

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		substantially the same way using a mechanical attachment configuration to couple the components together with a “click” fit. (*See* Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 18 seconds.) Further, the differences between a milk container that attaches directly to a lower part of a pump housing and a milk container that attaches to a lower part of a pump housing via a breast shield, such as in the Momcozy Mobile Flow device, are insubstantial. Accordingly, Momcozy Mobile Flow’s attachment of the milk container to a lower part of the pump housing is equivalent to the claimed attachment under the doctrine of equivalents.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) The Momcozy Mobile Flow includes “Stackable Milk Collectors” facilitated by the flat bottom base serving as the base of the milk container. (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

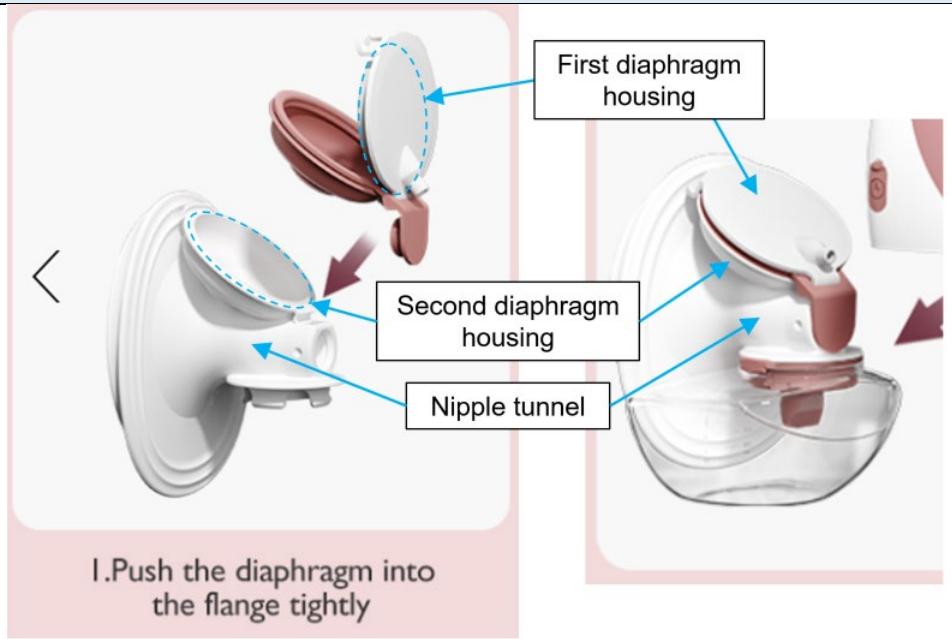
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Stackable Milk Collectors Effortlessly organize your breast milk storage while you're on the move. (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

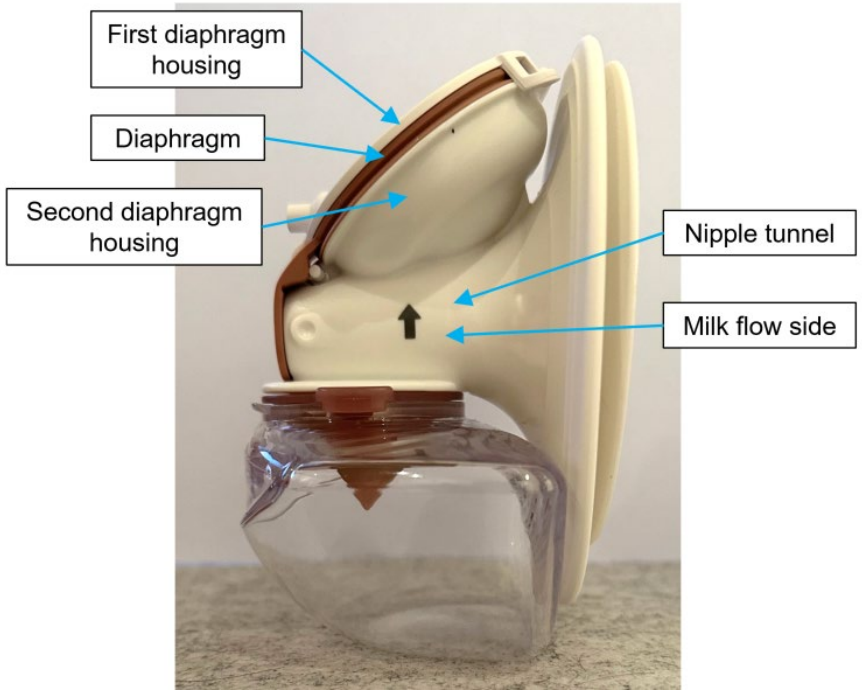
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
10	The breast pump device of claim 1, wherein the milk container has a surface shaped to continue a curved shape of the pump housing so that the breast pump device can be held comfortably inside a bra.	*See* claims 1 and 36. The Momcozy Mobile Flow’s milk container has a surface shaped to continue a curved shape of the pump housing so that the breast pump device can be held comfortably inside a bra.

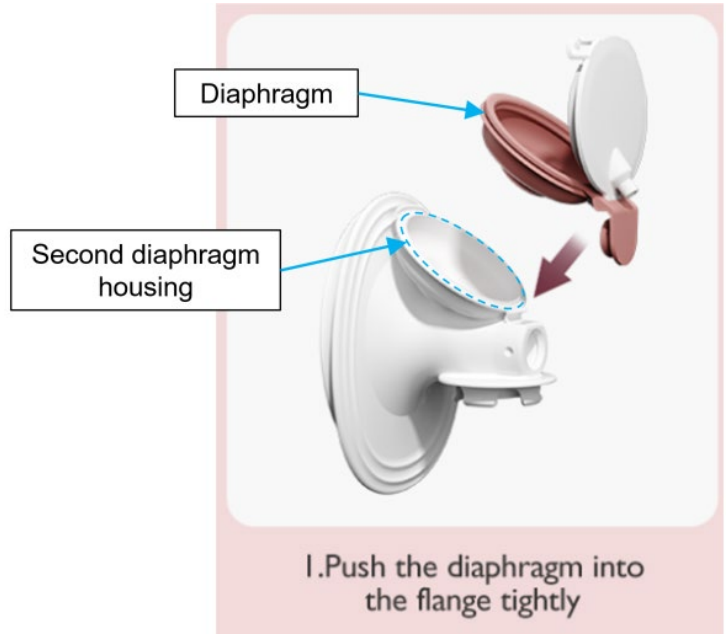
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
11	The breast pump device of claim 1, wherein the milk container is attachable to the pump housing with a mechanical or magnetic mechanism that releasably attaches or latches when the milk container is sufficiently pressed on to the pump housing with a single push action.	*See* claims 1 and 37. The Momcozy Mobile Flow’s milk container is attachable to the pump housing with a mechanical or magnetic mechanism that releasably attaches or latches when the milk container is sufficiently pressed on to the pump housing with a single push action.

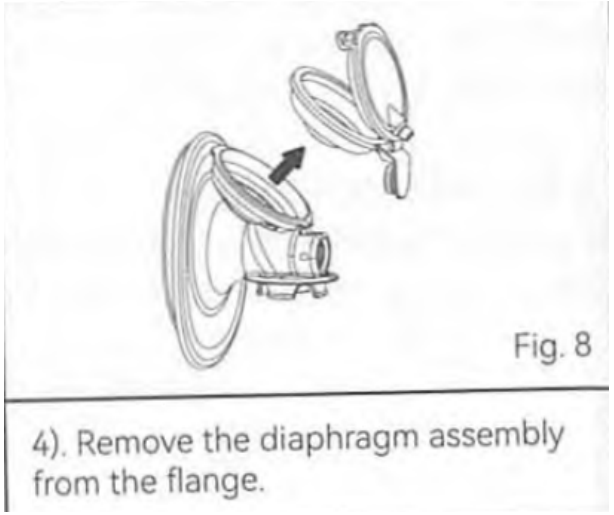
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
12	The breast pump device of claim 1, wherein the nipple tunnel includes on a lower surface of the nipple tunnel an opening through which expressed milk flows under gravity into the milk container.	*See* claims 1 and 38. The Momcozy Mobile Flow’s nipple tunnel includes on a lower surface of the nipple tunnel an opening through which expressed milk flows under gravity into the milk container.

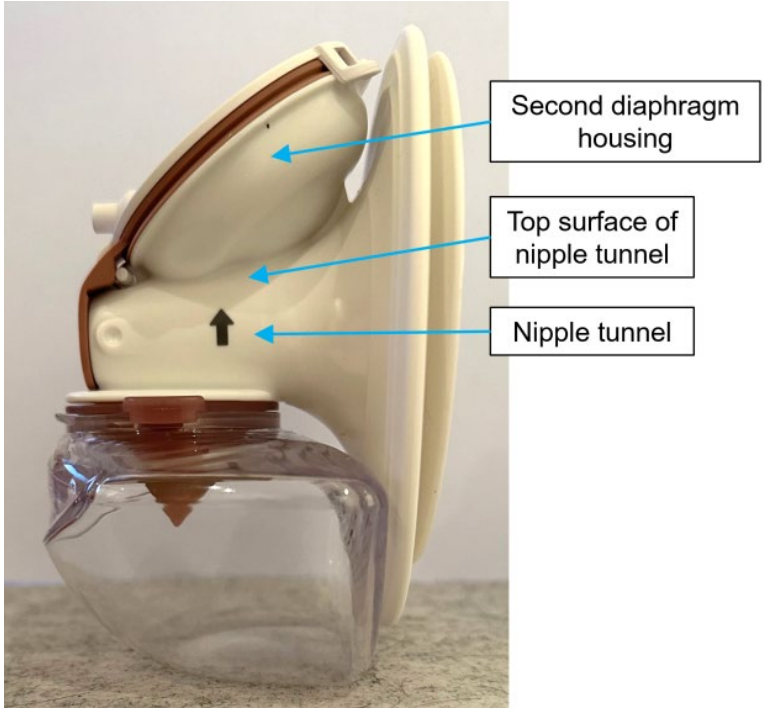
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
13	The breast pump device of claim 1, wherein the diaphragm defines a milk-flow side chamber on one side of the diaphragm and an air-side chamber on the other side of the diaphragm.	*See* claims 1 and 39. The Momcozy Mobile Flow’s diaphragm defines a milk-flow side chamber on one side of the diaphragm and an air-side chamber on the other side of the diaphragm.
15	The breast pump device of claim 1, wherein the diaphragm housing is a first diaphragm housing, and	*See* claim 1. The Momcozy Mobile Flow’s diaphragm housing is a first diaphragm housing, and the Momcozy Mobile Flow includes a second diaphragm housing attached to the nipple tunnel and configured to define a milk-flow side chamber. The Momcozy Mobile Flow’s diaphragm is configured to be positioned between the first diaphragm housing and the second diaphragm housing. As shown below, the Momcozy Mobile Flow includes a first diaphragm housing and a second diaphragm housing. The second diaphragm housing is attached to the nipple tunnel and defines a milk flow side.

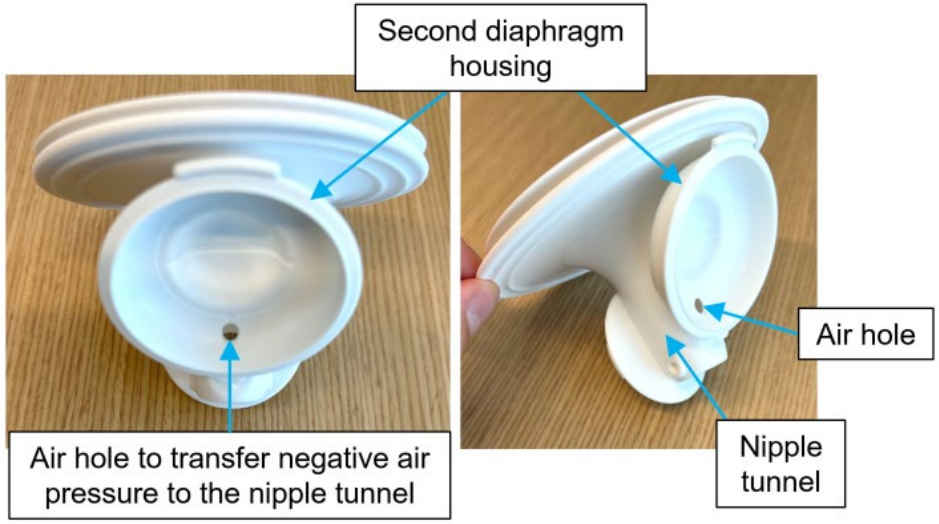
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
	wherein the breast pump device further comprises a second diaphragm housing attached to the nipple tunnel and configured to define a milk-flow side chamber, the diaphragm being configured to be positioned between the first diaphragm housing and the second diaphragm housing.	 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.) As shown below, the diaphragm is positioned between the first diaphragm housing and the second diaphragm housing.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Annotated photograph of Momcozy Mobile Flow device.

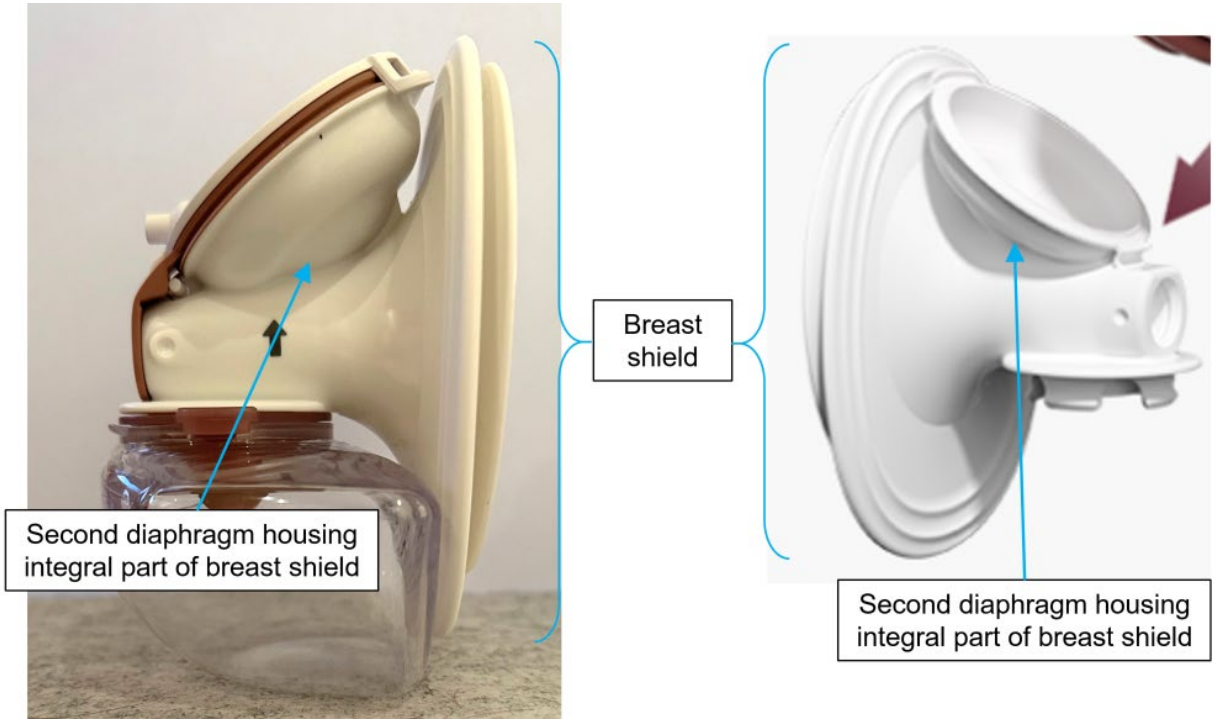
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
16	The breast pump device of claim 15, wherein the diaphragm is configured to be releasably secured around an edge of the second diaphragm housing.	*See* claims 1 and 15. The Momcozy Mobile Flow’s diaphragm is configured to be releasably secured around an edge of the second diaphragm housing. As shown below, Momcozy instruct users to push the diaphragm into the flange [and second diaphragm housing] tightly.” (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)  (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

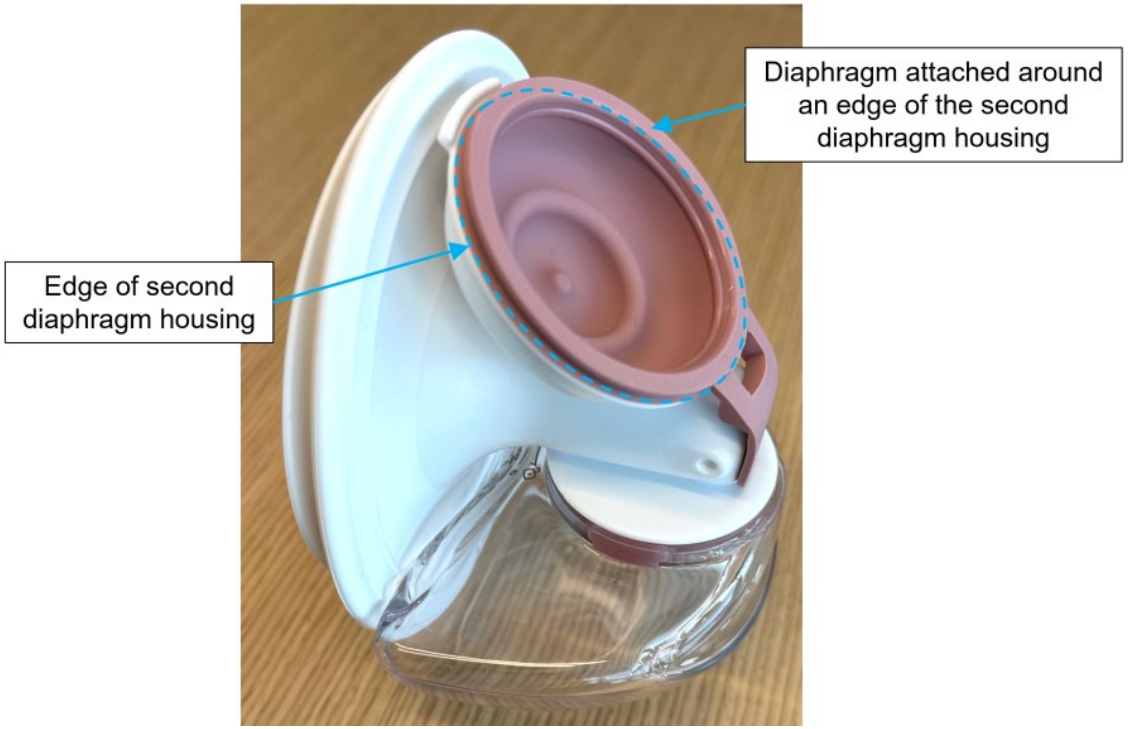
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		The Momcozy Mobile Flow User Manual instructs users to “[r]emove the diaphragm assembly from the flange.” (Momcozy Mobile Flow User Manual, p. 13.)  (Momcozy Mobile Flow User Manual, p. 13.)

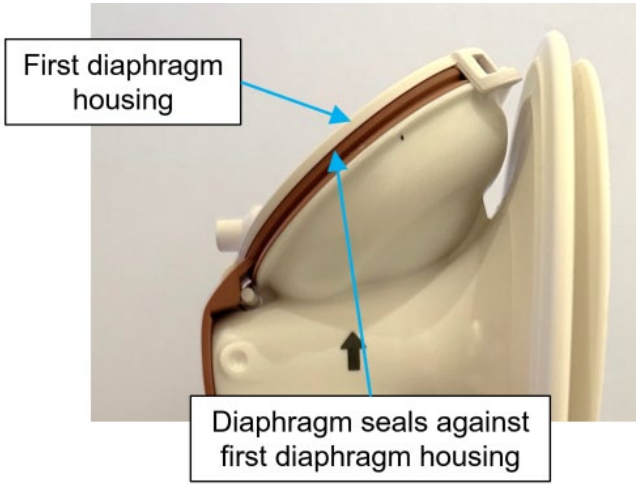
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
17	The breast pump device of claim 15, wherein the second diaphragm housing is positioned, when the breast pump device is upright, over a top surface of the nipple tunnel.	*See* claims 1 and 15. The Momcozy Mobile Flow’s second diaphragm housing is positioned, when the breast pump device is upright, over a top surface of the nipple tunnel. As shown below, Momcozy Mobile Flow’s second diaphragm housing is positioned, when the breast pump device is upright, over a top surface of the nipple tunnel.  Annotated photograph of Momcozy Mobile Flow device.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
18	The breast pump device of claim 15, wherein the second diaphragm housing includes an air hole to transfer negative air pressure to the nipple tunnel.	*See* claims 1 and 15. The Momcozy Mobile Flow’s second diaphragm housing includes an air hole to transfer negative air pressure to the nipple tunnel. As shown below, Momcozy Mobile Flow’s second diaphragm housing includes an air hole to transfer negative air pressure to the nipple tunnel.  Annotated photographs of Momcozy Mobile Flow device.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
19	The breast pump device of claim 15, wherein the diaphragm is a flexible and generally circular diaphragm and the second diaphragm housing has a corresponding generally circular shape.	*See* claims 1, 15, and 42. The Momcozy Mobile Flow’s diaphragm is a flexible and generally circular diaphragm and the second diaphragm housing has a corresponding generally circular shape. As shown below, the second diaphragm housing has a circular shape that correspond to the diaphragm shape. Annotated photograph of Momcozy Mobile Flow device.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
20	The breast pump device of claim 15, wherein the second diaphragm housing is an integral part of the breast shield.	*See* claims 1 and 15. The Momcozy Mobile Flow’s second diaphragm housing is an integral part of the breast shield. As shown below, the Momcozy Mobile Flow’s second diaphragm hosuing is an integral part of the breast shield.  (Annotated photographs of Momcozy Mobile Flow device; https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
21	The breast pump device of claim 15, wherein the diaphragm is configured to be attached around an edge of the second diaphragm housing.	*See* claims 1 and 15. The Momcozy Mobile Flow’s diaphragm is configured to be attached around an edge of the second diaphragm housing. As shown below, the Momcozy Mobile Flow’s diaphragm is configured to be attached around an edge of the second diaphragm housing.  Annotated photograph of Momcozy Mobile Flow device.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
22	The breast pump device of claim 15, wherein the diaphragm is configured to seal, self-seal, self energizing seal or interference fit seal against the first diaphragm housing.	*See* claims 1 and 15. The Momcozy Mobile Flow’s diaphragm is configured to seal, self-seal, self energizing seal or interference fit seal against the first diaphragm housing. As shown below, when the shield Momcozy Mobile Flow is assembled, the diaphragm is pushed aagainst the first diaphragm housing to form a seal.  Annotated photograph of Momcozy Mobile Flow device.

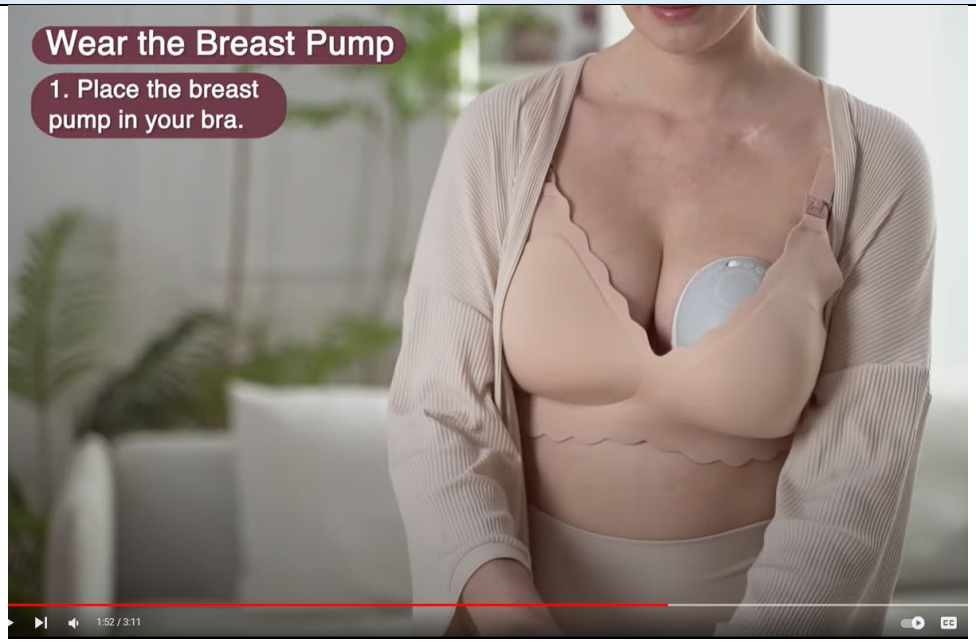
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
23	The breast pump device of claim 1, wherein the diaphragm is a flexible and generally circular diaphragm.	*See* claims 1 and 42. The Momcozy Mobile Flow’s diaphragm is a flexible and generally circular diaphragm.
24	The breast pump device of claim 1, wherein the diaphragm is a flexible and generally circular diaphragm that, in a relaxed state, includes an inner raised area and a concentric outer raised area.	*See* claims 1 and 42. The Momcozy Mobile Flow’s diaphragm is a flexible and generally circular diaphragm that, in a relaxed state, includes an inner raised area and a concentric outer raised area.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
26	The breast pump device of claim 1, wherein the self-contained, in-bra wearable device is configured so that expressed milk flows under gravity through an opening in the nipple tunnel and into the milk container through a duck-bill valve that stays sealed when there is negative air pressure being applied by the pump to ensure that negative air pressure is not applied to the milk container.	*See* claims 1 and 44. The Momcozy Mobile Flow’s self-contained, in-bra wearable device is configured so that expressed milk flows under gravity through an opening in the nipple tunnel and into the milk container through a duck-bill valve that stays sealed when there is negative air pressure being applied by the pump to ensure that negative air pressure is not applied to the milk container.

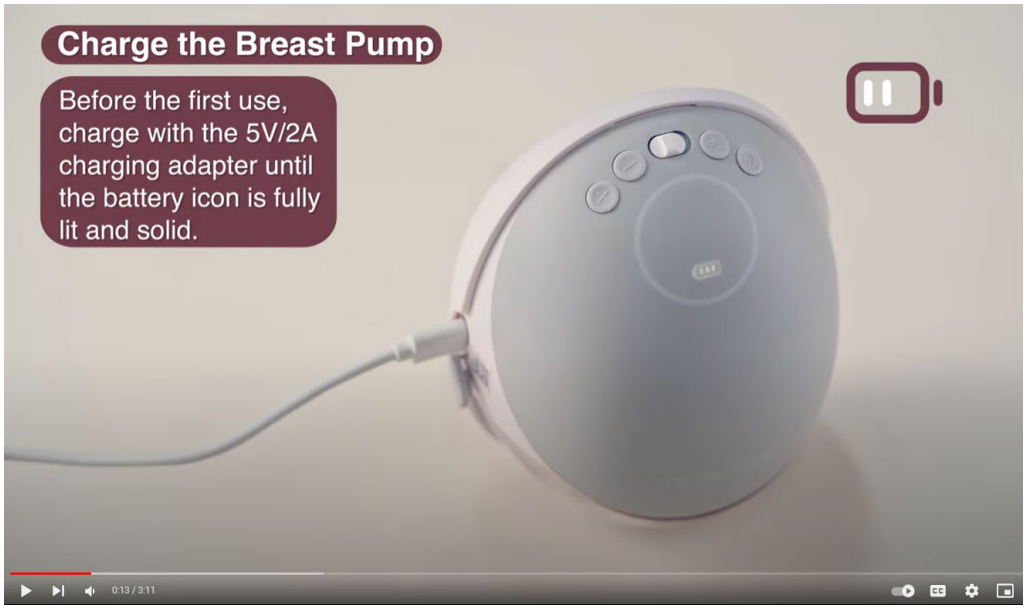
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
27	The breast pump device of claim 1, wherein the milk container comprises a curved surface that includes a flat area that serves as a base for the milk container.	*See* claims 1 and 45. The Momcozy Mobile Flow’s milk container comprises a curved surface that includes a flat area that serves as a base for the milk container.
28	The breast pump device of claim 1, wherein the milk container has a curved surface configured to enable the breast pump device to be held comfortably in a bra.	*See* claims 1 and 46. The Momcozy Mobile Flow’s milk container has a curved surface configured to enable the breast pump device to be held comfortably in a bra.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the '380 Patent.		
Claim Language		**Momcozy Mobile Flow**
29.P	A breast pump device that is configured as a self-contained, in-bra wearable device, the breast pump device comprising:	The Momcozy Mobile Flow is a breast pump device that is configured as a self-contained, in-bra wearable device. The Momcozy Mobile Flow is advertised as a "Wearable Breast Pump." (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) The Momcozy Mobile Flow is an in-bra wearable device.

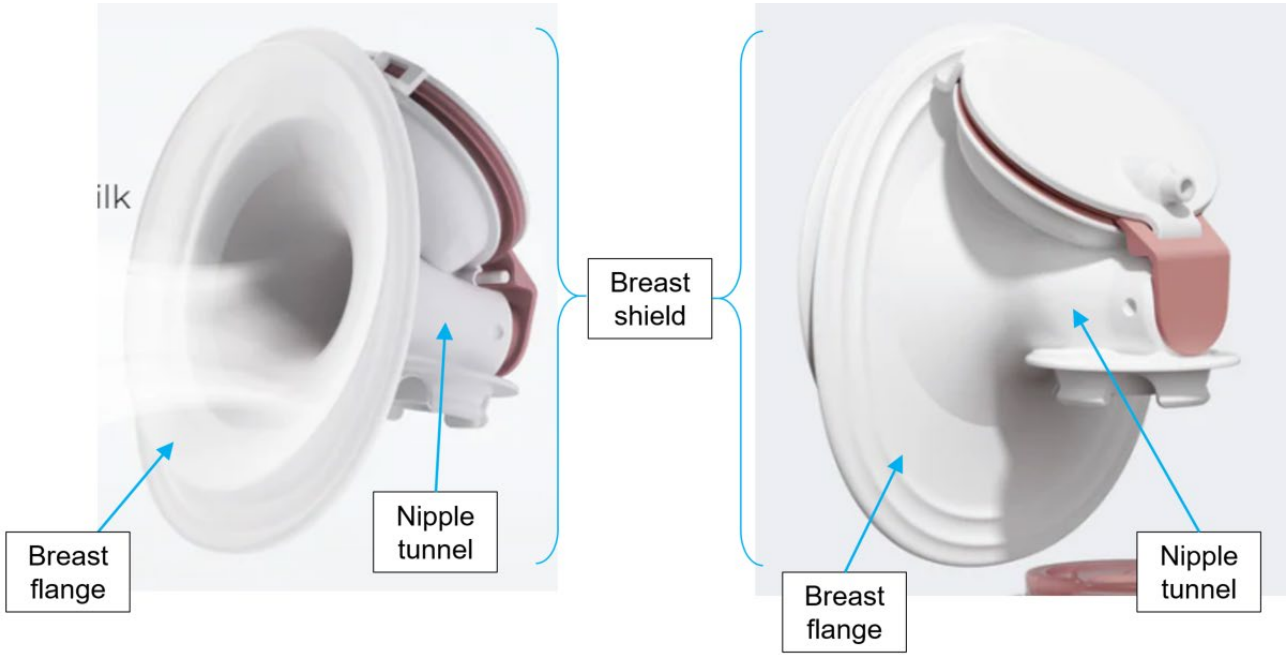
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) As shown above, the Momcozy Mobile Flow fits inside a user’s bra. Momcozy’s Amazon listing describes the Momcozy Mobile Flow as “More Fit & Discreet: Mobile Flow breast pump adopts DoubleFit Flange combining soft and hard silicone to ensure better comfort and safety. The drop-shaped design of the M9 breast pump fits seamlessly in the pump bra, allowing moms to pump with total privacy.” (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) Momcozy further instructs users to “place the breast pump in your bra.”

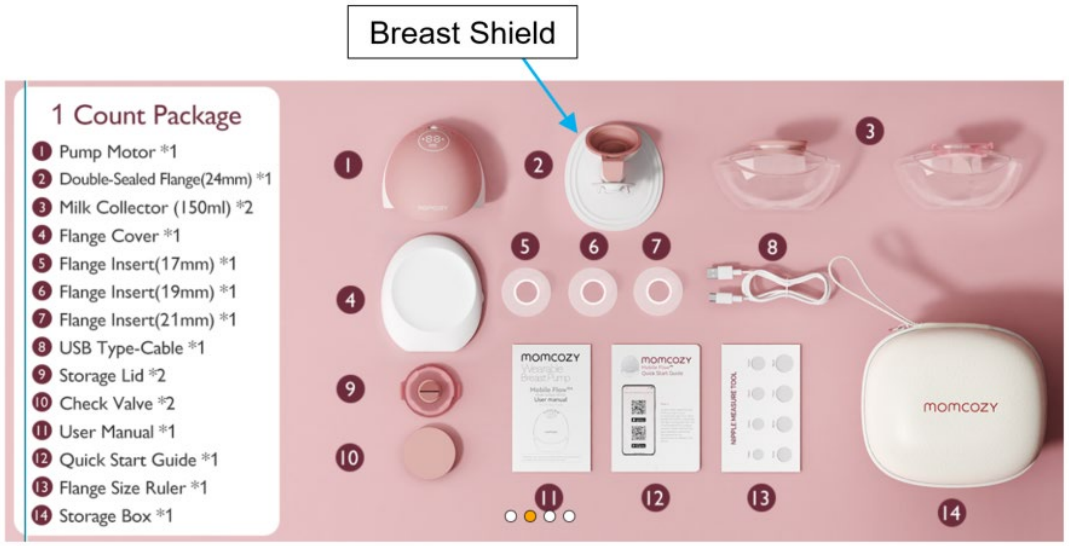
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 52 seconds.)
29.1	a self-contained, in-bra wearable device comprising:	*See* claim element 29.P.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
29.2	a housing that includes: a rechargeable battery, a power charging circuit for controlling charging of the rechargeable battery, control electronics powered by the rechargeable battery, a pump powered by the rechargeable battery and configured to generate negative air pressure, and	The Momcozy Mobile Flow includes a pump housing that includes a rechargeable battery, a power charging circuit for controlling charging of the rechargeable battery, control electronics powered by the rechargeable battery, a pump powered by the rechargeable battery and configured to generate negative air pressure, and a USB charging socket for transferring power to the power charging circuit and the rechargeable battery. (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) The Momcozy Mobile Flow housing includes a rechargeable battery. For example, Momcozy states that the Mobile Flow device includes a 1800mAh battery capable of “6 sessions per charge,” “150 minutes of usage,” and a “[c]harge time [of] approx. 2.5 hours.” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) Further, Momcozy instructs users “[b]efore the first use, charge with the 5V/2A charging

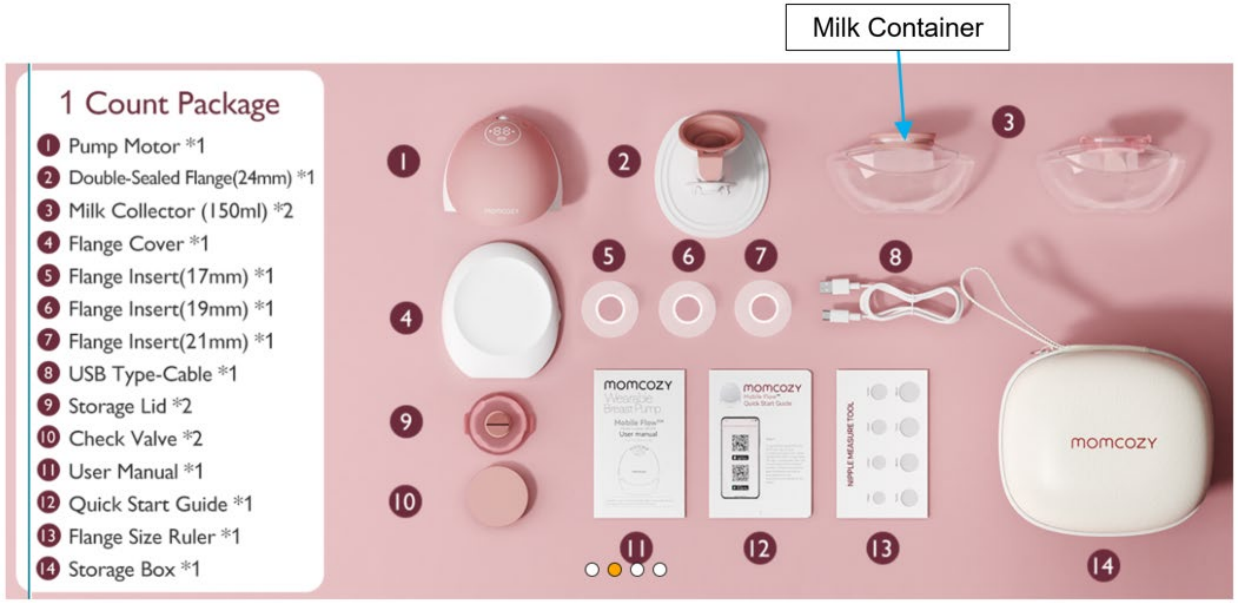
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
	a Universal Serial Bus (USB) charging socket for transferring power to the power charging circuit and the rechargeable battery;	adapter until the battery icon is fully lit and solid.” (Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, https://www.youtube.com/watch?v=E_V1cCRB6gY, at 13 seconds.) The Mobile Flow device includes a USB type-cable and USB socket, as shown below, for charging the device.  Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 13 seconds.) On information and belief, the Momcozy Mobile Flow pump housing includes a power charging circuit for controlling charging of the rechargeable battery and control electronics powered by the rechargeable battery because the Momcozy Mobile Flow is rechargeable and it has buttons that change the operation of the pump. As shown below, the Momcozy Mobile Flow housing includes a pump powered by the rechargeable battery

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		and configured to generate negative air pressure. Momcozy states that “[t]he 3rd-gen pump motor offers powerful suction up to -300mmHg to increase milk output,” and has “15 intensities [for] customizable settings for maximum comfort and milk flow.” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

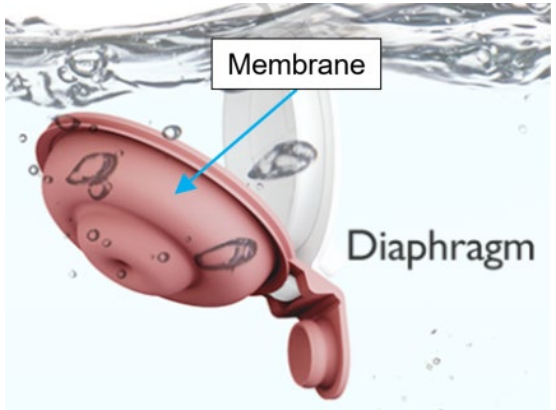
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the '380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		(https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)
29.3	a breast shield made up of a breast flange and a nipple tunnel;	The Momcozy Mobile Flow includes a breast shield that includes a breast flange and a nipple tunnel.  (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) The Momcozy Mobile Flow includes a "Double-sealed flange (24mm)." (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

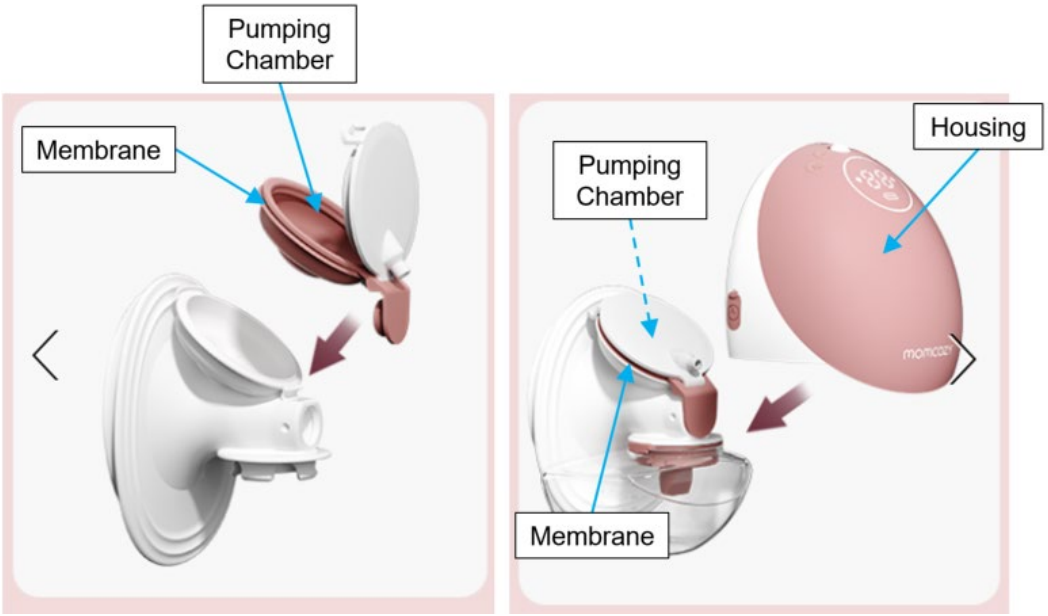
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

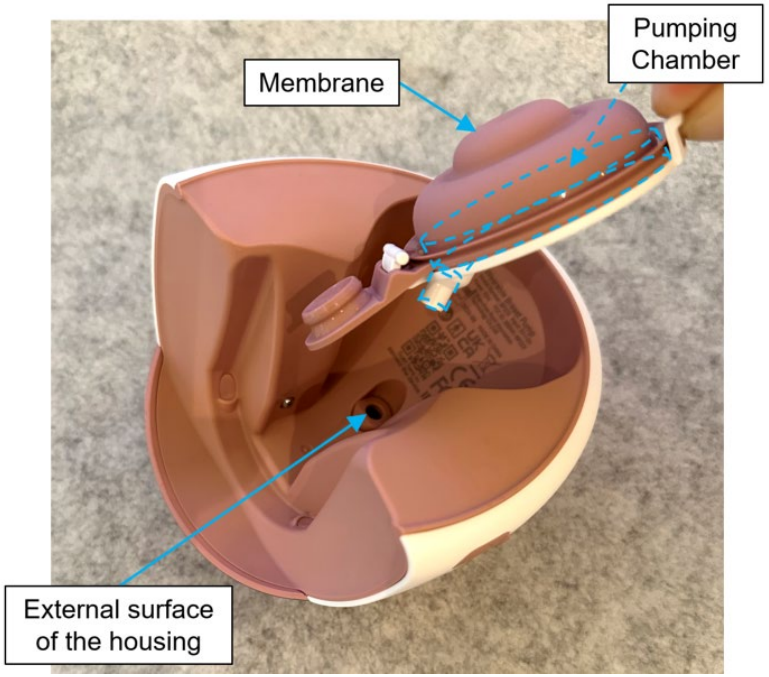
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
29.4	a milk container that is configured to be attached to and removed from the housing; and	The Momcozy Mobile Flow includes a milk container that is configured to be attached to and removed from the housing. Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 3 minutes 5 seconds.) The Momcozy website indicates that the Mobile Flow has a “bottle capacity: 150ml.” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

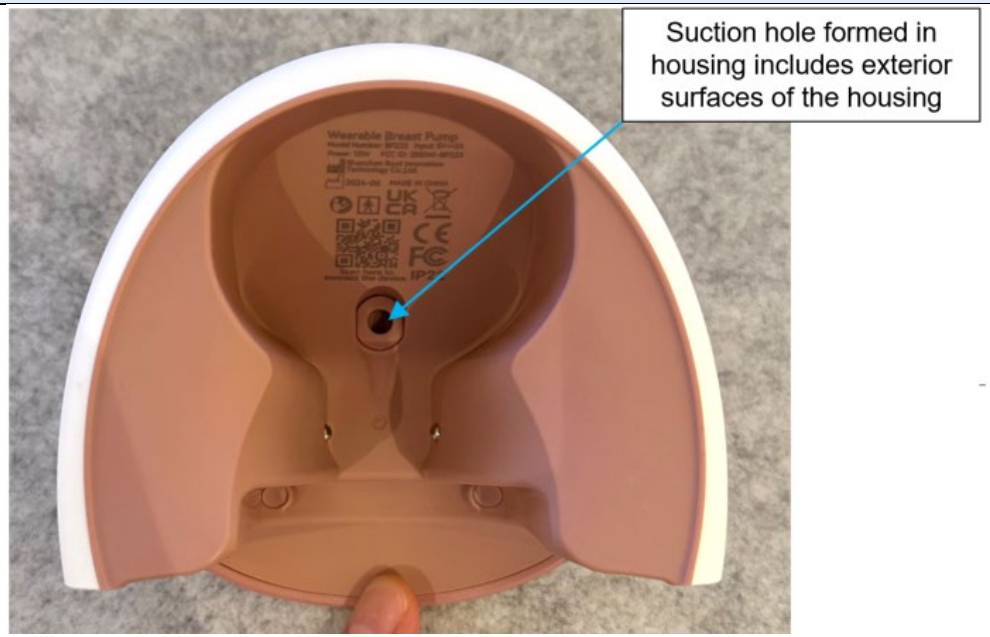
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) The Momcozy Mobile Flow milk container is configured to be attached to and removed from the housing, via the breast shield’s connection with the housing.

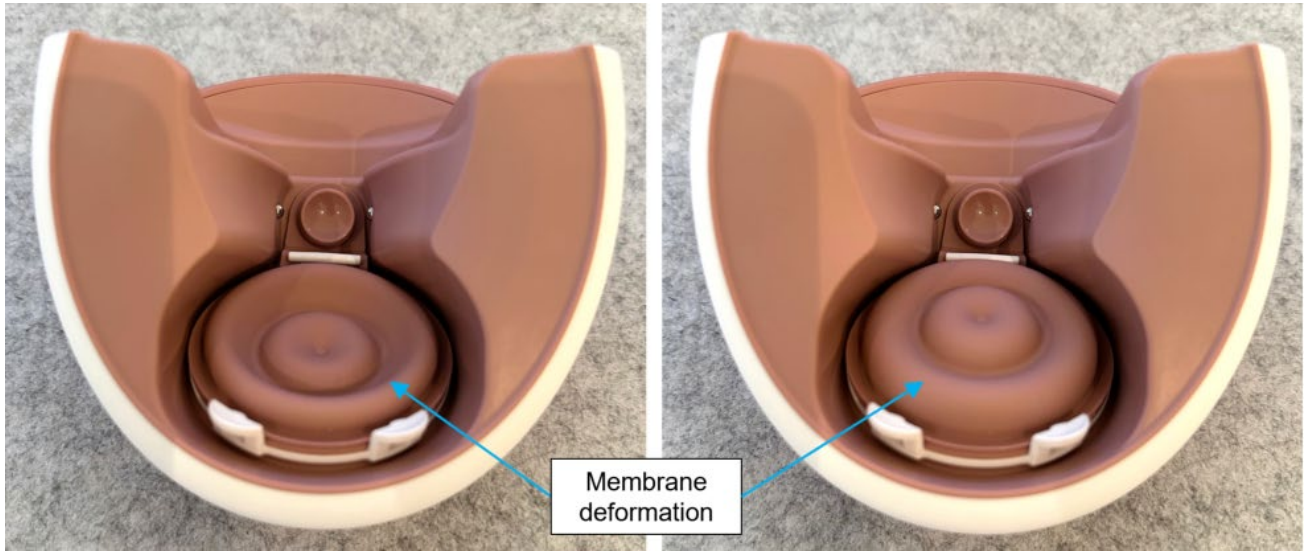
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump; https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) To the extent that the Momcozy Mobile Flow does not literally attach the milk container to the housing, this claim is met under the doctrine of equivalents. The Momcozy Mobile Flow’s milk container is configured to attach to the housing, via the breast shield’s connection with the housing. This attachment of the milk container performs substantially the same function as the claimed attachment of mounting the milk container relative to the housing in a compact arrangement. The attachment between the milk container, breast shield, and housing

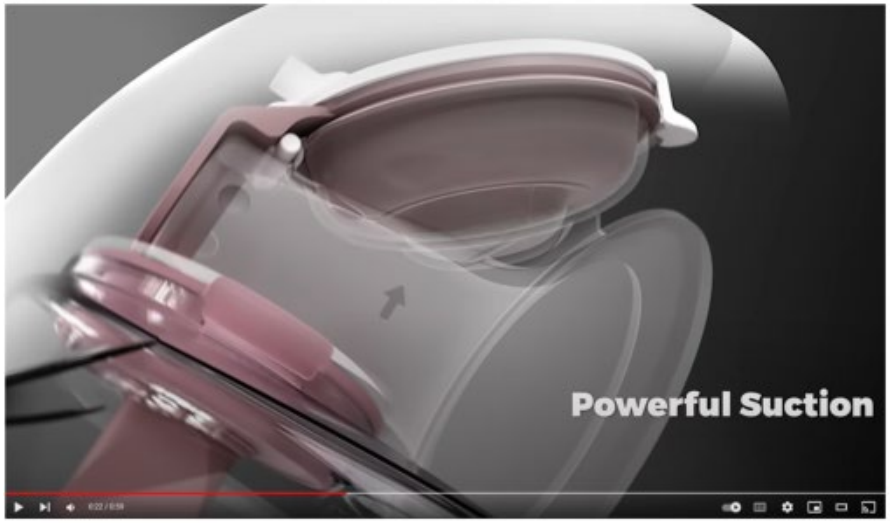
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the '380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		achieves the same result of positioning the milk container and housing in a compact arrangement such that the Mobile Flow device can be in-bra wearable. This attachment between the milk container, breast shield, and housing works in substantially the same way using a mechanical attachment configuration to couple the components together with a "click" fit. (*See* Momcozy "How to Use Mobile Flow™ Hands-free Breast Pump" video, https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 18 seconds.) Further, the differences between a milk container that attaches directly to a housing and a milk container that attaches to a housing via a breast shield, such as in the Momcozy Mobile Flow device, are insubstantial. Accordingly, Momcozy Mobile Flow's attachment of the milk container to the housing is equivalent to the claimed attachment under the doctrine of equivalents.
29.5	a membrane that is configured to define a pumping chamber at least in part with an external surface of the housing,	The Momcozy Mobile Flow includes a membrane that is configured to define a pumping chamber at least in part with an external surface of the housing. The Momcozy Mobile Flow device includes a diaphragm membrane.  (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		As shown below, the membrane is seated on a diaphragm holder that is fixed to an external surface of the housing to define a pumping chamber.  (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

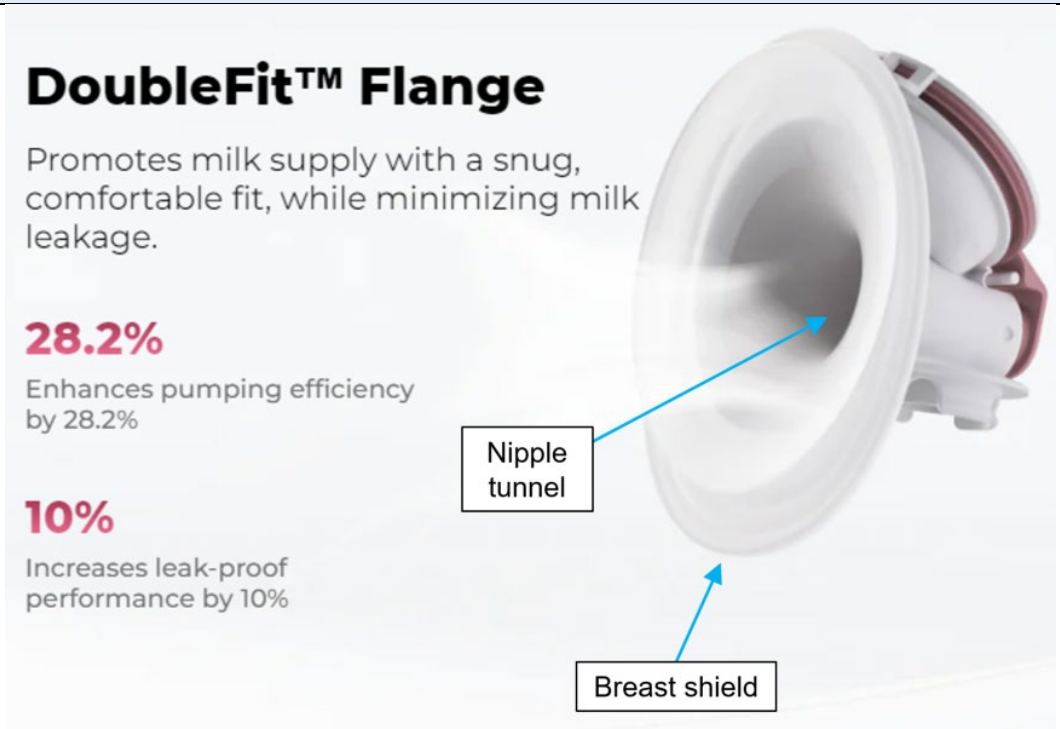
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Annotated photograph of Mobile Flow Device.

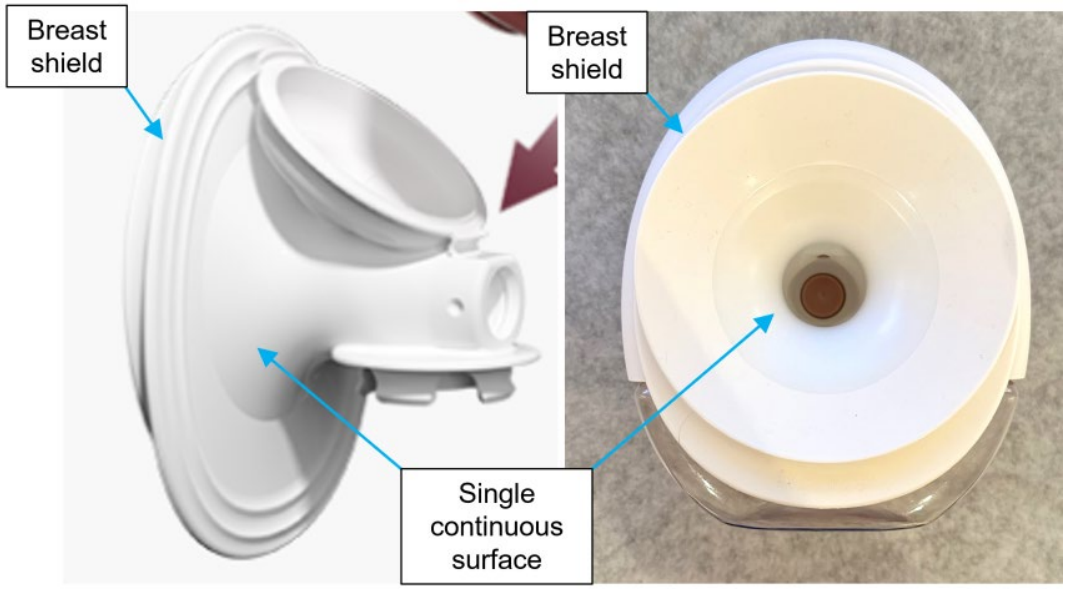
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Annotated photograph of Mobile Flow Device.

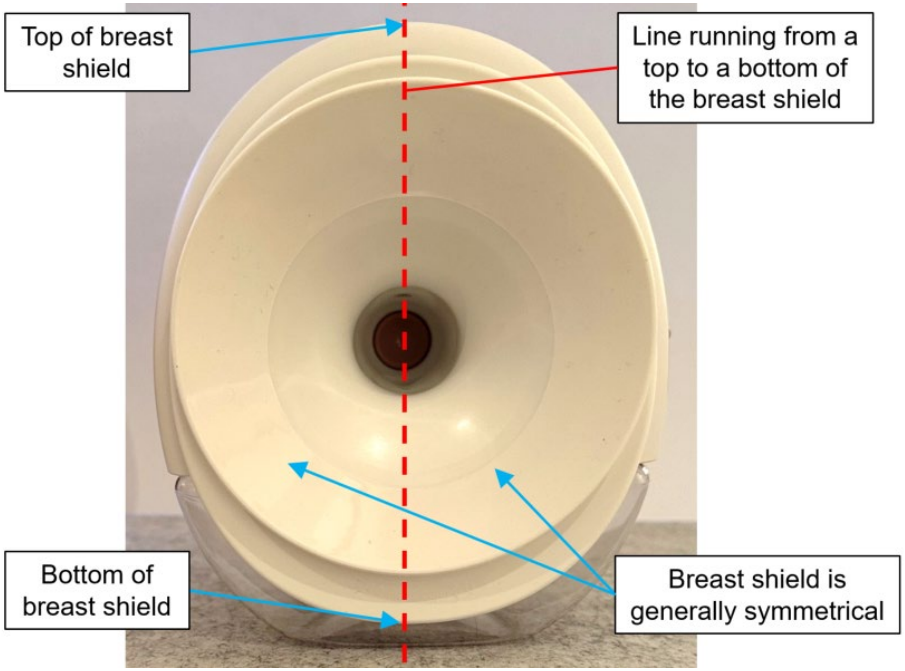
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
29.6	the membrane configured to deform in response to changes in air pressure caused by the pump to create negative air pressure in the nipple tunnel.	The Momcozy Mobile Flow’s membrane is configured to deform in response to changes in air pressure caused by the pump to create negative air pressure in the nipple tunnel. The Momcozy Mobile Flow device includes 15 “adjustable suction levels,” and generates a “vacuum: -300mmHg.” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) As cyclic negative pressure is generated by the pump, the membrane deforms to create negative air pressure in the nipple tunnel. (*See* https://www.youtube.com/watch?v=UPKrZCbAkHI, at 22-24 seconds, showing deformation of the membrane in response to changes in air pressure caused by the pump.)  Annotated photographs of Mobile Flow device.

		   "Momcozy Mobile Flow™ Hands-free Breast Pump" video, (https://www.youtube.com/watch?v=UPKrZCbAkHI, at 22-24 seconds.)
30	The breast pump device of	*See* claim 29. The Momcozy Mobile Flow includes a breast shield that is configured to rotate smoothly around a nipple inserted into the nipple tunnel to provide a correct positioning of the breast shield onto a breast.

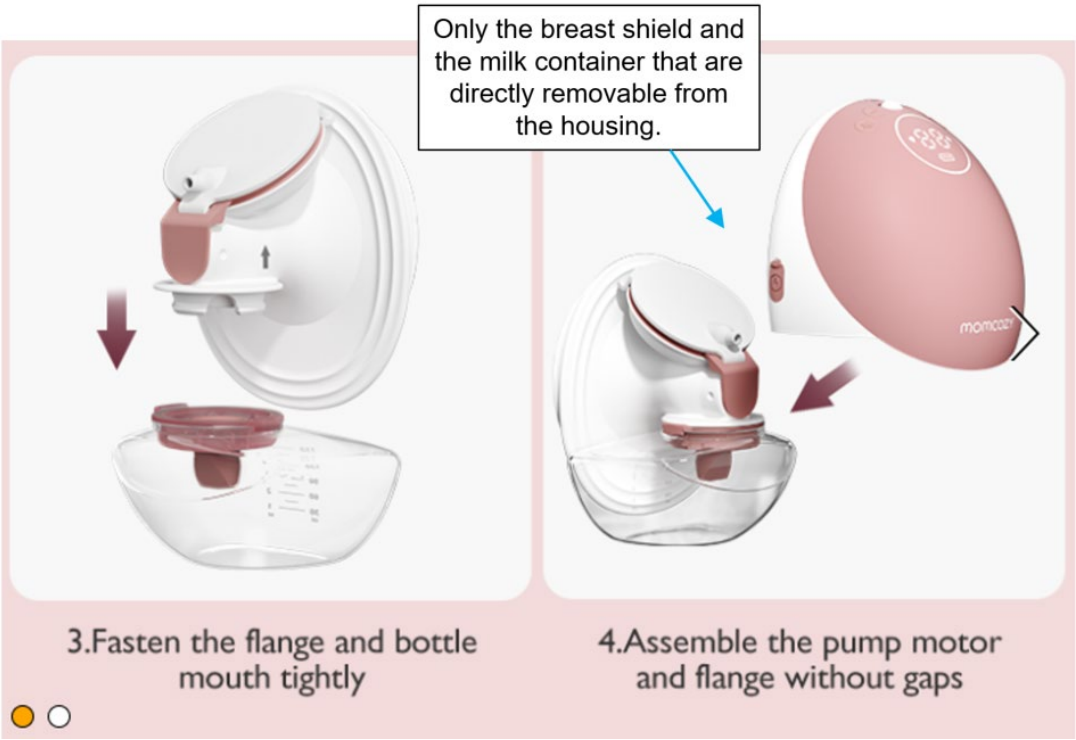
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
	claim 29, wherein the breast shield is configured to rotate smoothly around a nipple inserted into the nipple tunnel to provide a correct positioning of the breast shield onto a breast.	For example, as shown below, the Momcozy Mobile Flow is advertised as including “More Fit & Discreet: Mobile Flow breast pump adopts DoubleFit Flange combining soft and hard silicone to ensure better comfort and safety.” (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) Further, as shown below, the surface of the breast shield is smooth and allows rotation around the nipple to properly align the nipple tunnel around the user’s nipple.

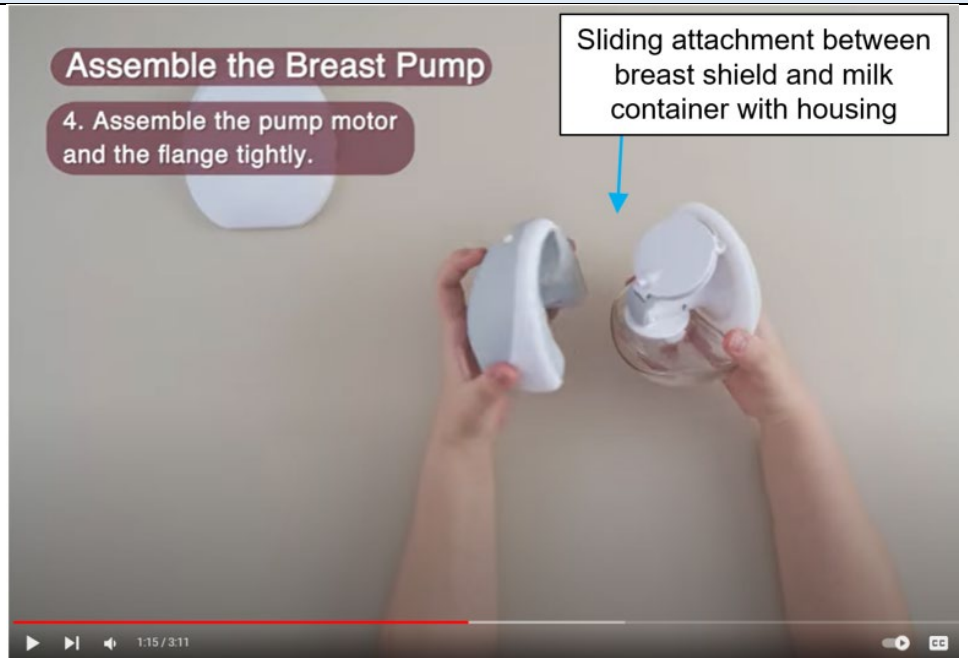
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
31	The breast pump device of claim 29, wherein the breast shield is a one piece item that in use presents a single continuous surface to a nipple and a breast.	*See* claim 29. The Momcozy Mobile Flow includes a breast shield that is a one-piece item that, in use, presents a single continuous surface to a nipple and a breast. For example, Momcozy advertises that the Momcozy Mobile Flow “DoubleFit Flange . . . [p]romotes milk supply with a snug, comfortable fit, while minimizing milk leakage.” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)  (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp; annotated photographs of Momcozy Mobile Flow device.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
32	The breast pump device of claim 29, wherein the breast shield has a top and bottom when positioned upright for normal use, and wherein the breast shield is generally symmetrical about a center-line running from the top to the bottom of the breast shield when positioned upright for normal use.	*See* claim 29. The Momcozy Mobile Flow includes a breast shield that has a top and bottom when positioned upright for normal use, and the breast shield is generally symmetrical about a center-line running from the top to the bottom of the breast shield when positioned upright for normal use. As shown below, the Momcozy Mobile Flow includes a breast shield that is generally symmetrical about a center-line running from a top to a bottom of the breast shield when positioned upright for normal use.  Annotated photograph of Momcozy Mobile Flow device.

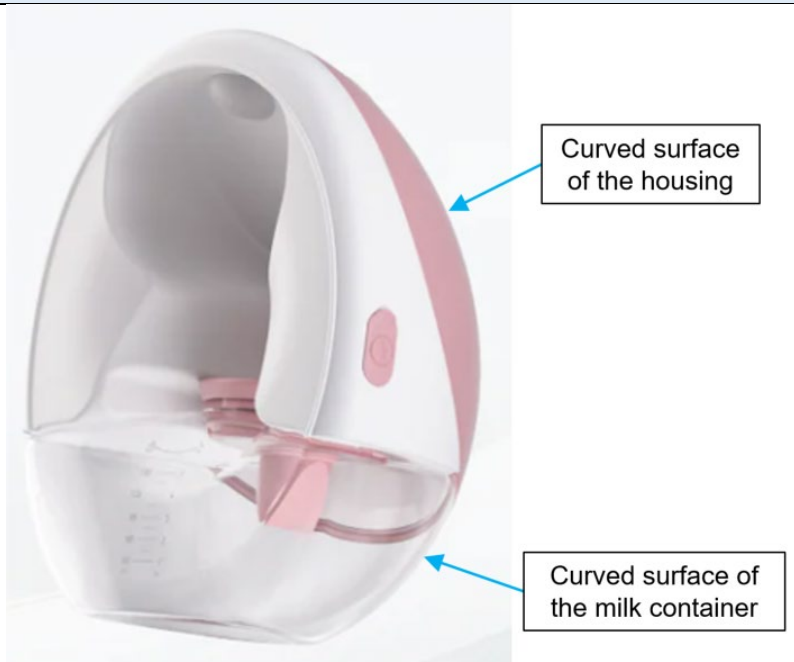
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the '380 Patent.		
Claim Language		**Momcozy Mobile Flow**
33	The breast pump device of claim 29, wherein the breast pump device includes only the breast shield and the milk container that are directly removable from the housing in normal use or normal dis-assembly.	*See* claim 29. The Momcozy Mobile Flow includes only the breast shield and the milk container that are directly removable from the housing in normal use or normal disassembly. As shown below, the Momcozy Mobile Flow's breast shield and milk container slide into attachment with the housing and are the only component that slideably attach to the housing. The Momcozy Mobile Flow advertising material instructs a user to "fasten the flange and bottle mouth tightly . . . [and] assemble the pump motor and flange without gaps." (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

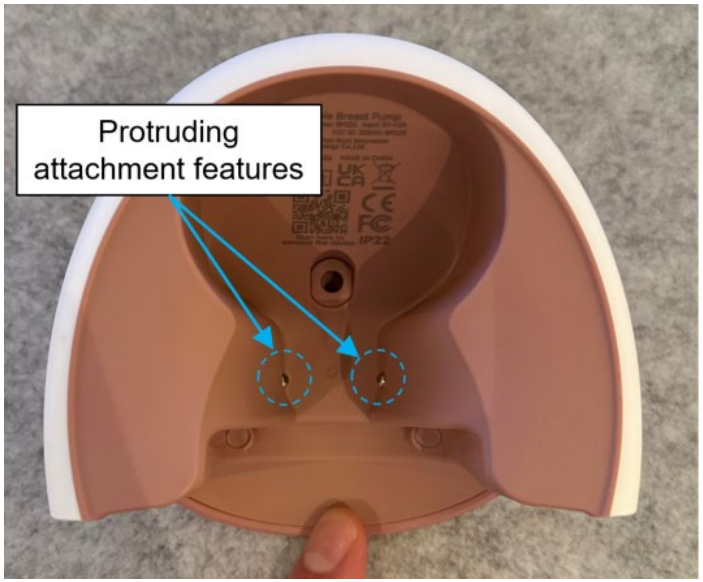
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.) The sliding attachment of the breast shield and milk container with the housing is shown in the Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, screenshot reproduced below.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 15 seconds.) To the extent that the diaphragm and diaphragm housing component are not literally part of the breast shield, this claim is met under the doctrine of equivalents. The Momcozy Mobile Flow diaphragm is assembled to and moves with the breast shield such that the assembly of the breast shield and diaphragm perform substantially the same function of directly coupling to the housing with a single push. Indeed, the combined assembly of the breast shield and diaphragm achieves the same result of simplifying the breast pump device assembly by easily removing washable parts from the non-washable housing in a single step. The Momcozy Mobile Flow breast shield and diaphragm work in substantially the same way by allowing the user to assemble the device with a

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		single push or pull to either assemble or disassemble the device. Further, the differences between assembling the breast shield directly to the housing and assembling the breast shield and diaphragm assembly to the housing are insubstantial. Accordingly, Momcozy Mobile Flow’s breast shield and diaphragm assembly are equivalent to the claimed breast shield being directly removable from the housing under the doctrine of equivalents.
34	The breast pump device of claim 29, wherein the membrane is substantially circular.	See claim 29. The Momcozy Mobile Flow’s membrane is substantially circular. As shown below, the Momcozy Mobile Flow’s membrane is circular. Annotated photographs of Momcozy Mobile Flow’s membrane.

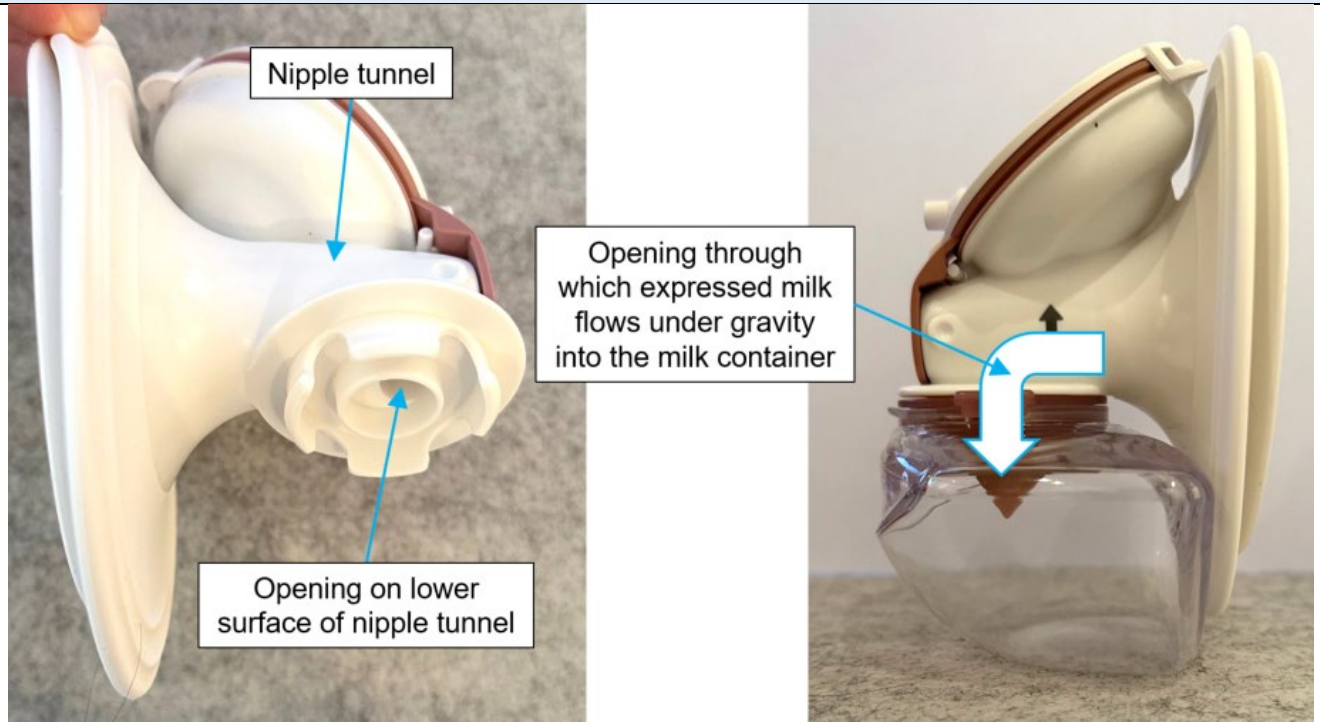
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the '380 Patent.		
Claim Language		**Momcozy Mobile Flow**
35	The breast pump device of claim 29, wherein the milk container is substantially rigid.	*See* claim 29. The Momcozy Mobile Flow milk container is substantially rigid. For example, the Momcozy Mobile Flow includes a "Milk Collector." (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) The milk container is made of a plastic material that is substantially rigid.
36	The breast pump device of claim 29, wherein the milk container has a surface shaped to continue a curved shape of the housing so that the breast pump device can be held comfortably inside a bra.	*See* claim 29. The Momcozy Mobile Flow includes a milk container that has a surface shaped to continue a curved shape of the pump housing so that the breast pump device can be held comfortably inside a bra.

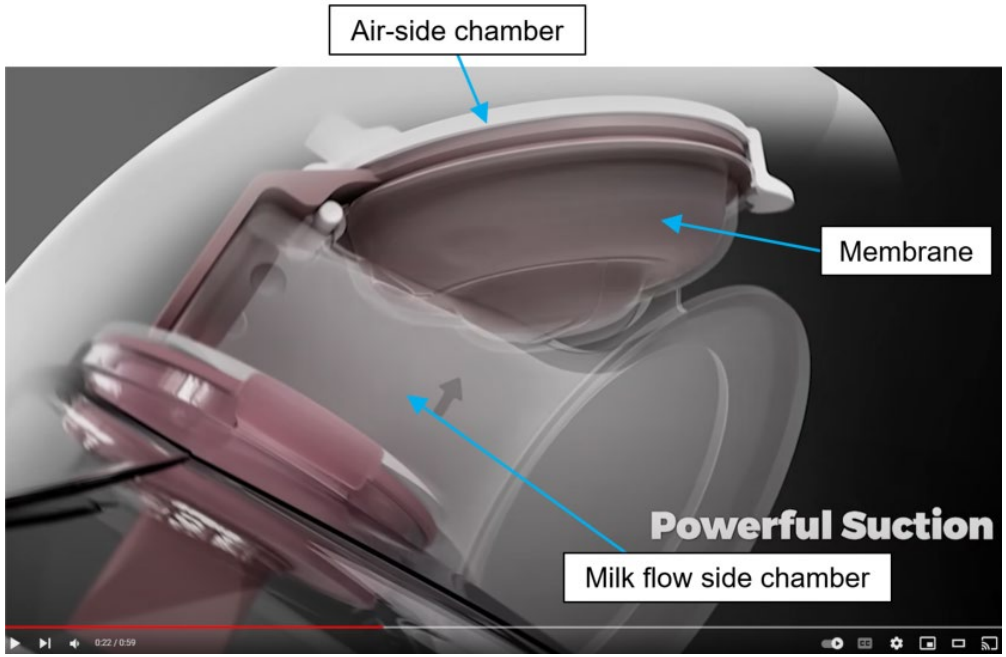
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

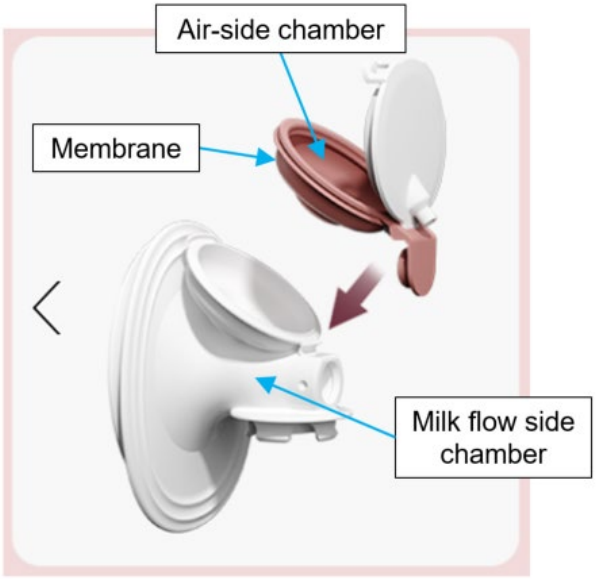
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
37	The breast pump device of claim 29, wherein the milk container is attachable to the housing with a mechanical or magnetic mechanism that releasably attaches or latches when the milk container is sufficiently pressed on to the housing with a single push action.	*See* claim 29. The Momcozy Mobile Flow includes a milk container that is attachable to the pump housing with a mechanical or magnetic mechanism that releasably attaches or latches when the milk container is sufficiently pressed onto the pump housing with a single push action, as shown below. The Momcozy Mobile Flow housing and breast shield attach to the housing with a mechanical mechanism. As shown below, the housing include a pair of protruding bearings that engage with recesses on the breast shield, which is attached to the milk container.  (Annotated photographs of Momcozy Mobile Flow device; https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		The Momcozy “How to Use Mobile Flow” video instructs a user to “assemble to the pump motor and the flange tightly,” and shows a single push action to assemble the parts. The video further shows that when connected properly, the mechanical mechanism “clicks” into place. Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 18 seconds.) To the extent that the Momcozy Mobile Flow does not literally attach the milk container to the housing with a mechanical mechanism, this claim is met under the doctrine of equivalents. The Momcozy Mobile Flow’s milk

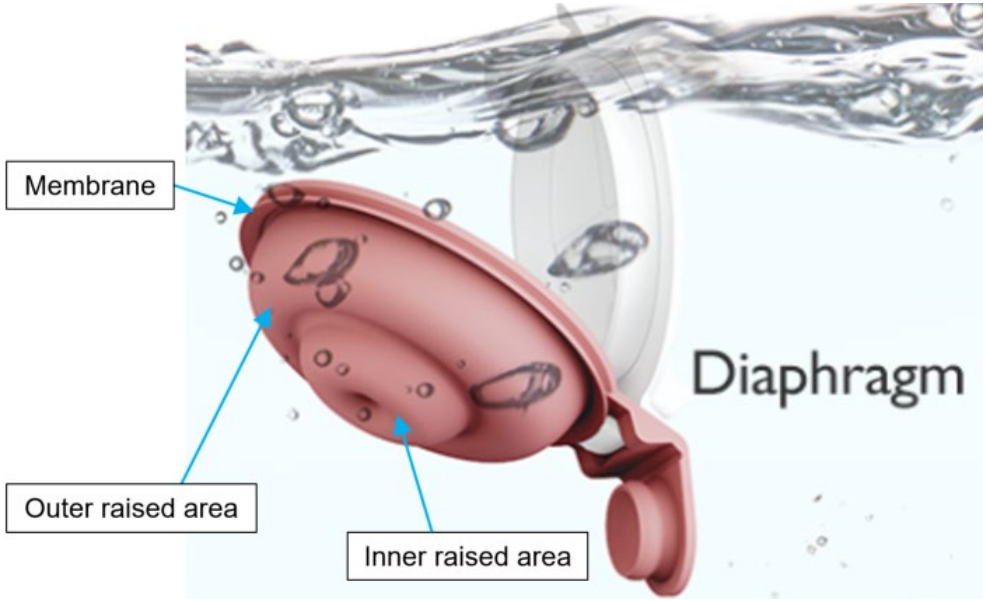
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the '380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		container is configured to attach to the housing, via the breast shield's connection with the housing that uses a mechanical mechanism. This attachment of the milk container performs substantially the same function as the claimed attachment of mounting the milk container relative to the housing in a compact arrangement and with a single push action securing mechanism. The attachment between the milk container, breast shield, and housing achieves the same result of securing the milk container relative to the housing such that the milk container does not slip away from or fall out of the housing. This attachment between the milk container, breast shield, and housing works in substantially the same way using a mechanical attachment configuration to couple the components together with a "click" fit. (*See* Momcozy "How to Use Mobile Flow™ Hands-free Breast Pump" video, https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 18 seconds.) Further, the differences between a milk container that attaches directly to a housing and a milk container that attaches to a housing via a breast shield, such as in the Momcozy Mobile Flow device, are insubstantial. Accordingly, Momcozy Mobile Flow's attachment of the milk container to the housing is equivalent to the claimed attachment under the doctrine of equivalents.
38	The breast pump device of claim 29, wherein the nipple tunnel includes on a lower surface of the nipple tunnel an opening through which expressed milk flows under gravity into the milk container.	*See* claim 29. The Momcozy Mobile Flow's nipple tunnel includes on a lower surface of the nipple tunnel an opening through which expressed milk flows under gravity into the milk container. As shown below, an opening is formed on the lower surface of the nipple tunnel in the Momcozy Mobile Flow device. Expressed milk flows through the opening under gravity into the milk container.

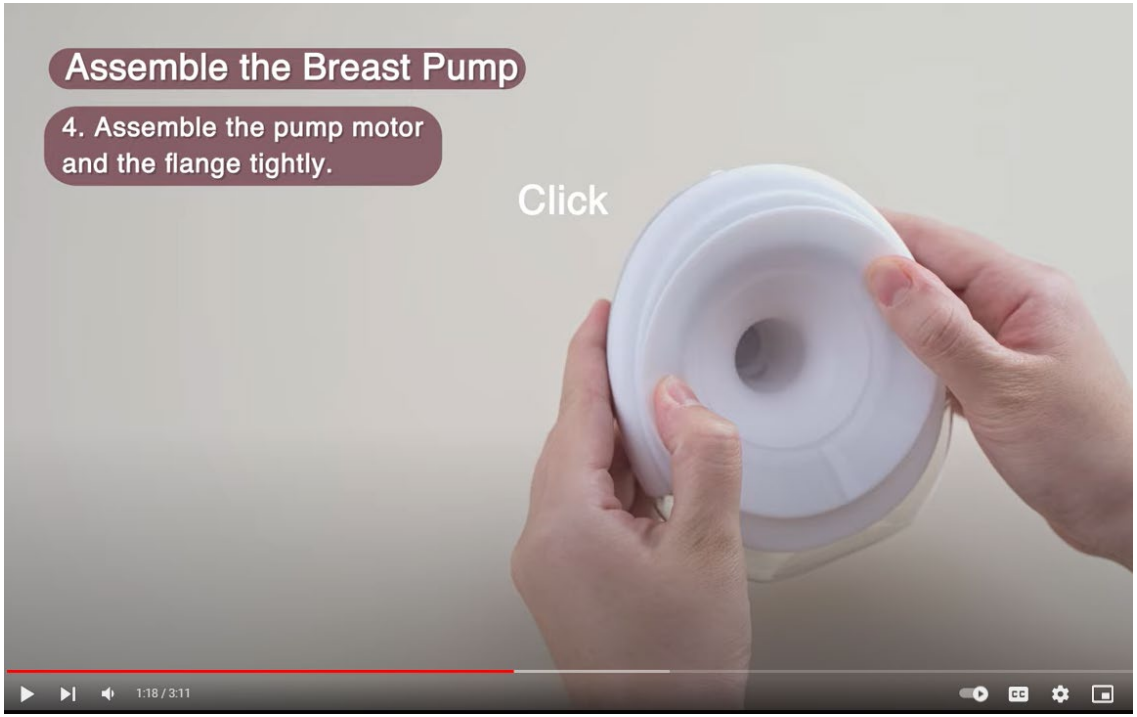
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Annotated photographs of Momcozy Mobile Flow Breast Shield.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
39	The breast pump device of claim 29, wherein the membrane defines a milk-flow side chamber on one side of the membrane and an air-side chamber on the other side of the membrane.	*See* claim 29. The Momcozy Mobile Flow’s membrane defines a milk-flow side chamber on one side of the membrane and an air-side chamber on the other side of the membrane. As shown below, the Momcozy Mobile Flow defines a milk-flow side chamber and an air-side chamber on opposite sides of the membrane.  “Momcozy Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=UPKrZCbAkHI, 22 seconds.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
41	The breast pump device of claim 29, the membrane is a flexible membrane.	*See* claim 29. The Momcozy Mobile Flow diaphragm is a flexible membrane, as shown below. Photograph of Momcozy Mobile Flow Membrane.

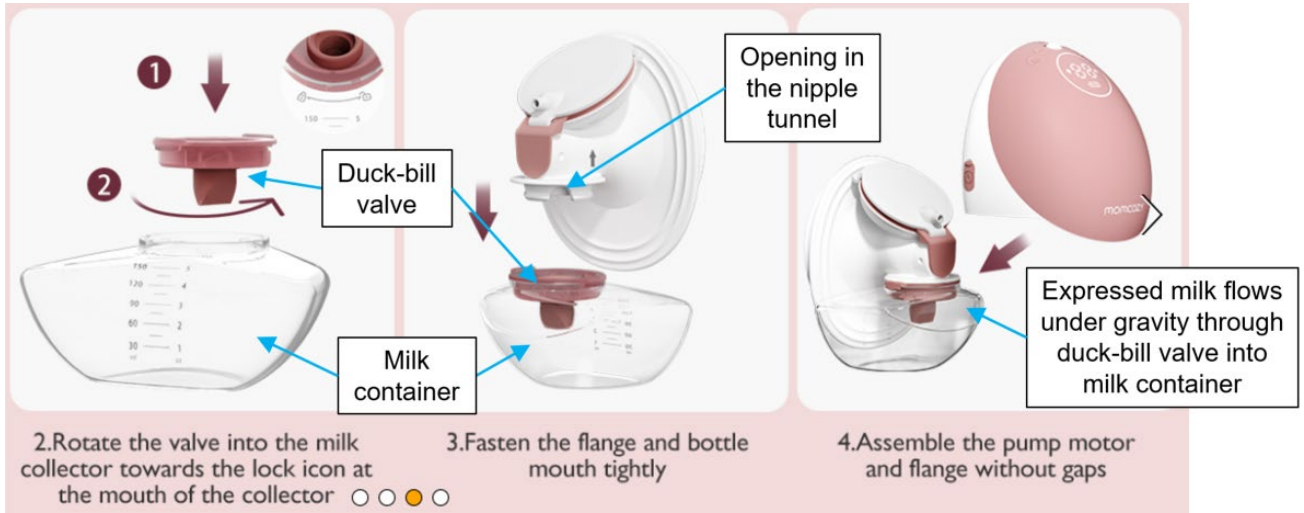
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
42	The breast pump device of claim 29, wherein the membrane is a flexible and generally circular membrane that, in a relaxed state, includes an inner raised area and a concentric outer raised area.	See claims 29, 34, and 41. The Momcozy Mobile Flow membrane is a flexible and generally circular membrane. When in a relaxed state, it includes an inner raised area and a concentric outer raised area.  (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

43	The breast pump device of claim 29, wherein the milk container is configured to be pressed or pushed into engagement with the housing.	*See* claims 29 and 37. The Momcozy Mobile Flow includes a milk container that is configured to be pressed or pushed into engagement with the housing, as shown below. The Momcozy "How to Use Mobile Flow" video instructs a user to "assemble to the pump motor and the flange tightly," and shows a single push action to assemble the parts. The video further shows that when connected properly, the mechanical mechanism "clicks" into place.  Momcozy "How to Use Mobile Flow™ Hands-free Breast Pump" video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 18 seconds.) To the extent that the Momcozy Mobile Flow does not literally press or push the milk container into engagement with the housing, this claim is met under the doctrine of equivalents. The Momcozy Mobile Flow's milk container is configured to pushed or pressed into engagement with the housing, via the breast

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		shield’s connection with the housing. This engagement of the milk container performs substantially the same function as the claimed engagement of the milk container with the housing with a single push action securing mechanism. The engagement between the milk container, breast shield, and housing achieves the same result of securing the milk container relative to the housing such that the milk container does not slip away from or fall out of the housing. This engagement between the milk container, breast shield, and housing works in substantially the same way using a mechanical attachment configuration to couple the components together with a “click” fit. (*See* Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 18 seconds.) Further, the differences between a milk container that attaches directly to a housing and a milk container that attaches to a housing via a breast shield, such as in the Momcozy Mobile Flow device, are insubstantial. Accordingly, Momcozy Mobile Flow’s engagement of the milk container to the housing, via the breast shield, is equivalent to the claimed attachment under the doctrine of equivalents.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
44	The breast pump device of claim 29, wherein the self-contained, in-bra wearable device is configured so that expressed milk flows under gravity through an opening in the nipple tunnel and into the milk container through a duck-bill valve that stays sealed when there is negative air pressure being applied by the pump to ensure that negative air pressure is not applied to the milk container.	*See* claims 29 and 38. The Momcozy Mobile Flow includes an opening in the nipple tunnel and into the milk container through a duck-bill valve that stays sealed when there is negative air pressure being applied by the pump to ensure that negative air pressure is not applied to the milk container. The Momcozy Mobile Flow device is supplied with two “Duckbill Valve[s].” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		As shown below, expressed milk flows under gravity through an opening in the nipple tunnel (*see* claim 38) and into the milk container through a duck-bill valve. On information and belief, the duck-bill valve stays sealed when there is negative air pressure being applied by the pump to ensure that negative air pressure is not applied to the milk container.  (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
45	The breast pump device of claim 29, wherein the milk container comprises a curved surface that includes a flat area that serves as a base for the milk container.	*See* claim 29. The Momcozy Mobile Flow includes a milk container that comprises a curved surface that includes a flat area that serves as a base for the milk container, as shown below. (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) The Momcozy Mobile Flow includes “Stackable Milk Collectors” facilitated by the flat area serving as the base of the milk container. (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Stackable Milk Collectors Effortlessly organize your breast milk storage while you're on the move. (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-13, 15-24, 26-39 and 41-46 of the ’380 Patent.		
Claim Language		**Momcozy Mobile Flow**
46	The breast pump device of claim 29, wherein the milk container has a curved surface configured to enable the breast pump device to be held comfortably in a bra.	*See* claims 29 and 36. The Momcozy Mobile Flow includes a milk container with a curved surface configured to enable the breast pump device to be held comfortably in a bra. (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

Pursuant to Local Patent Rule 120(a), Elvie restates herein that it asserts claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 patent. For the reasons stated below, Momcozy’s activities in connection with the manufacture, use, sale, offer for sale, and/or importation of the Momcozy Mobile Flow device will constitute infringement under 35 U.S.C. §§ 271(a), (b), and (c) of the asserted claims.

Pursuant to Local Patent Rule 120(b), Elvie specifically identifies the Momcozy Mobile Flow device as the “Accused Device.” The Momcozy Mobile Flow device contains each and every limitation of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 patent literally or under the doctrine of equivalents, and thus infringe those asserted claims as set forth herein.

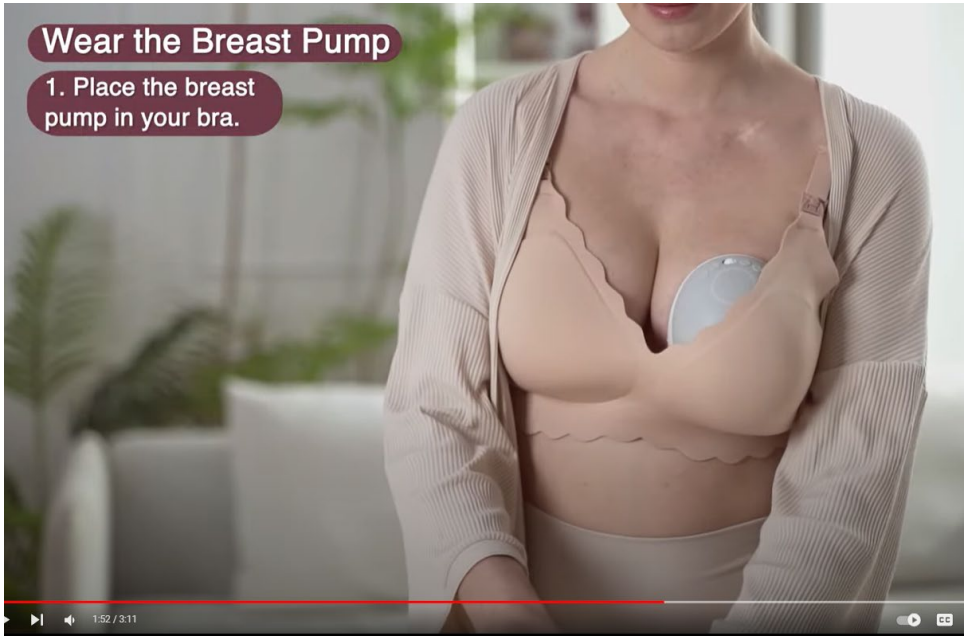
Pursuant to Local Patent Rule 120(c)–(e), Elvie submits the following claim chart identifying specifically where each limitation of each asserted claim is found within the Accused Device either directly, literally or under the doctrine of equivalents, or indirectly. Elvie reserves the right to modify and/or supplement the claim chart herein where appropriate as discovery progresses. In the event that a claim limitation is deemed to be missing under a literal infringement analysis, Elvie reserves the right to demonstrate the presence of a substantial equivalent of such an element and to pursue infringement under the doctrine of equivalents.

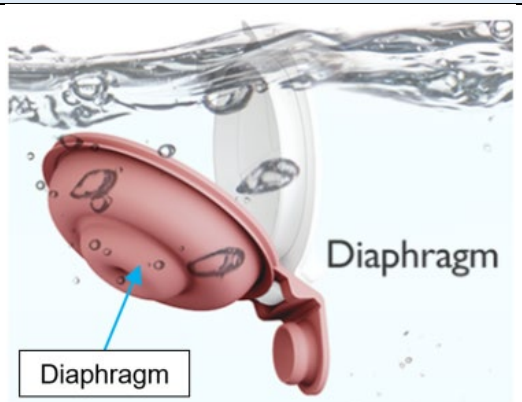
Pursuant to Local Patent Rule 120(f), Elvie states that each asserted claim of the ’381 patent is entitled to a priority date that is no later than June 15, 2017.

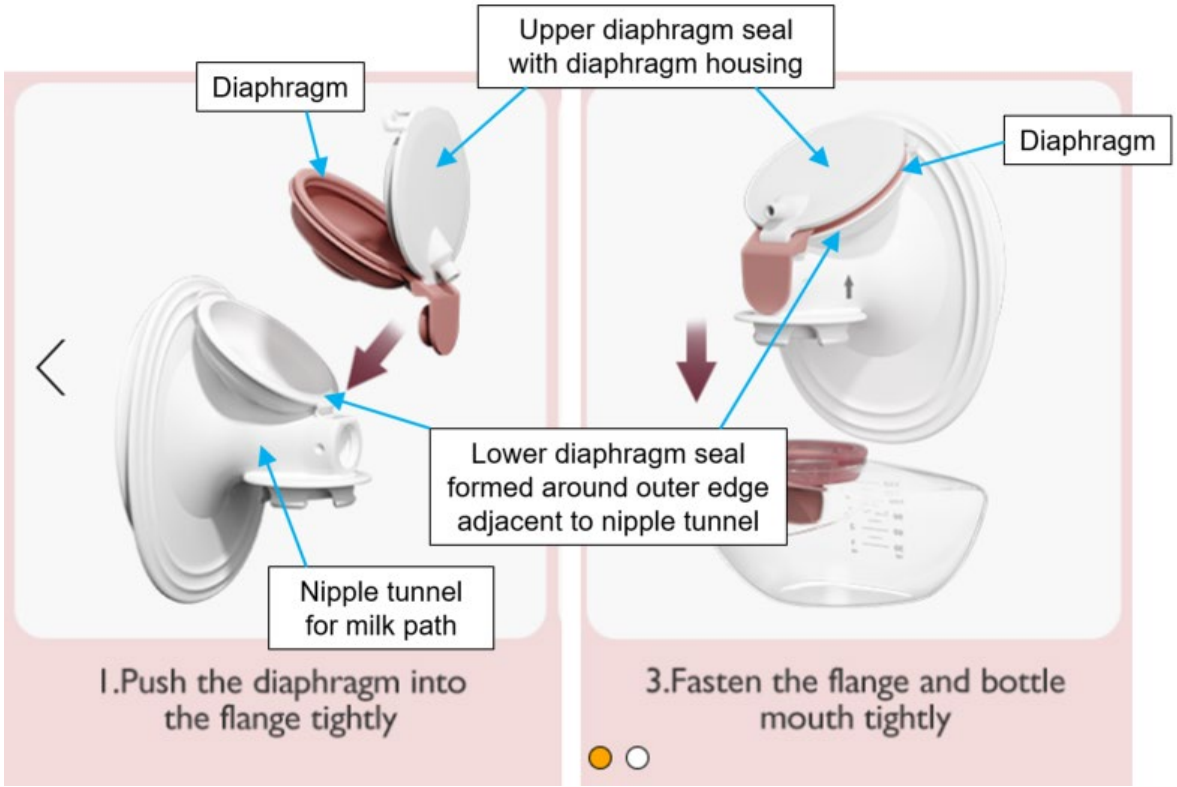
Elvie reserves the right to base its infringement case on additional information in Momcozy’s production, deposition testimonies, interrogatory responses, responses to requests for admission, and/or any other pleadings, as well as expert testing and/or testimony. In particular, Elvie reserves the right to modify and/or supplement the theories disclosed herein in view of any additional evidence regarding infringement.

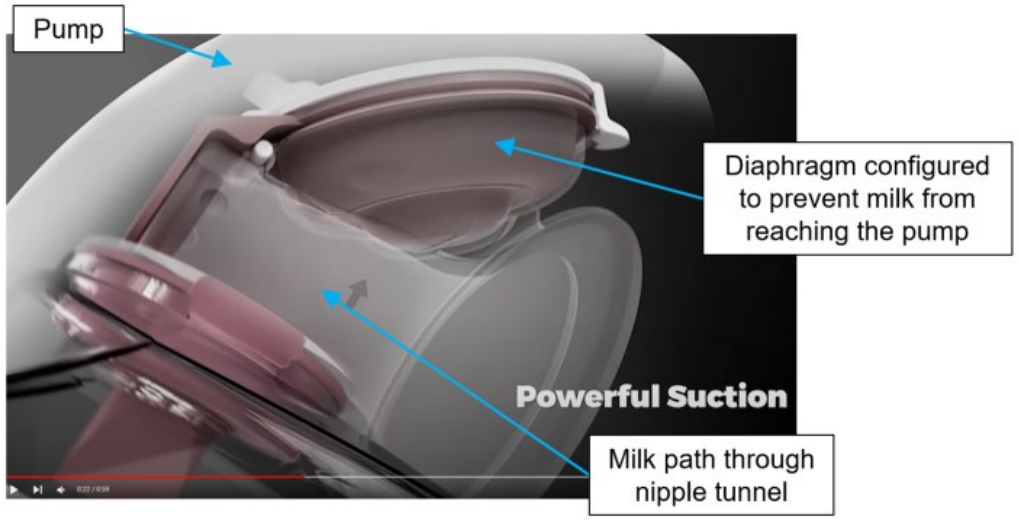
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
1.P	A breast pump device comprising:	The Momcozy Mobile Flow is a breast pump device. The Momcozy Mobile Flow is described as a “Hands-Free Breast Pump.” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)
1.1	a self-contained, in-bra wearable device comprising: a diaphragm configured to prevent milk from reaching an air pump by forming a seal around its outer edge;	The Momcozy Mobile Flow is a self-contained, in-bra wearable device and includes a diaphragm configured to prevent milk from reaching an air pump by forming a seal around its outer edge. The Momcozy Mobile Flow is advertised as a “Wearable Breast Pump.” (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1) (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

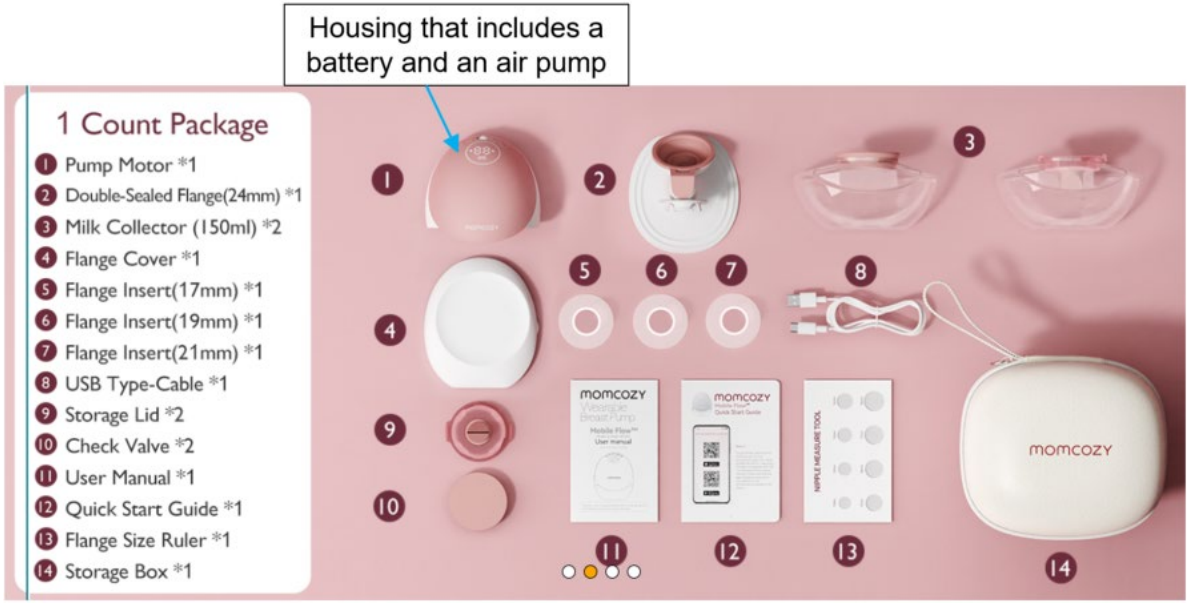
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		The Momcozy Mobile Flow is an in-bra wearable device. (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) As shown above, the Momcozy Mobile Flow fits inside a user’s bra. Momcozy’s Amazon listing describes the Momcozy Mobile Flow as “More Fit & Discreet: Mobile Flow breast pump adopts DoubleFit Flange combining soft and hard silicone to ensure better comfort and safety. The drop-shaped design of the M9 breast pump fits seamlessly in the pump bra, allowing moms to pump with total privacy.” (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		Momcozy further instructs users to “place the breast pump in your bra.”  Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 52 seconds.) Momcozy Mobile Flow includes a diaphragm configured to prevent milk from reaching an air pump by forming a seal around its outer edge.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.) The diaphragm has an outer edge that seals on a lower side to a housing adjacent to the nipple tunnel, and seals on an upper side with a diaphragm housing as shown below.

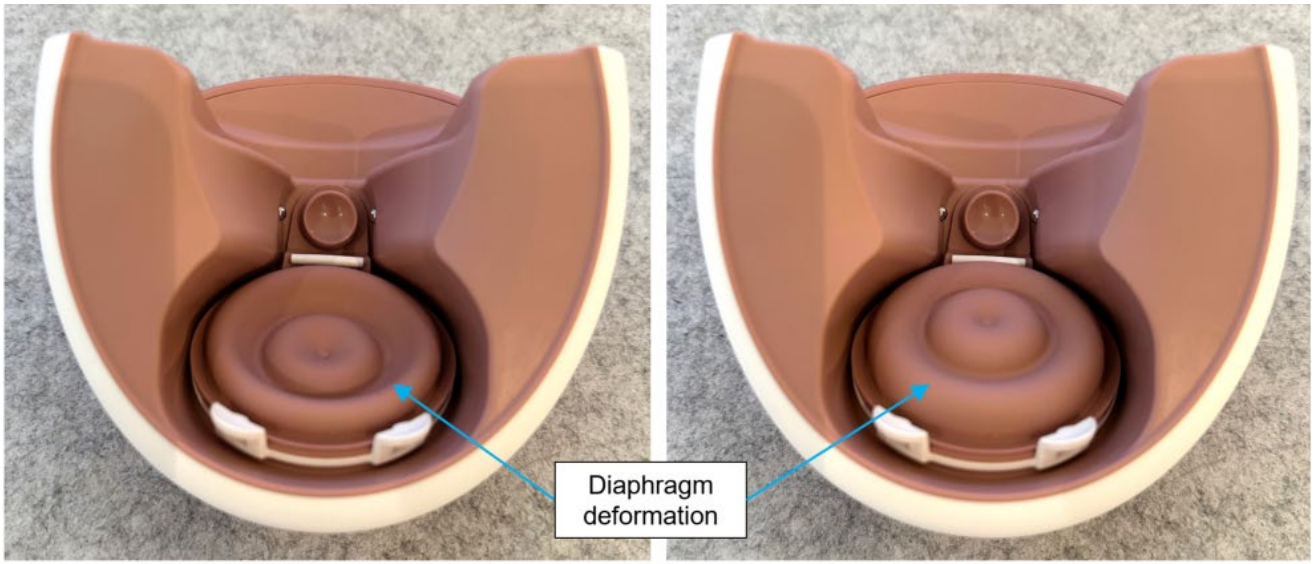
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.) When milk is expressed through the nipple tunnel, the diaphragm blocks any path between the nipple tunnel, where milk is initially received, to the pump, thereby preventing milk from reaching the pump.

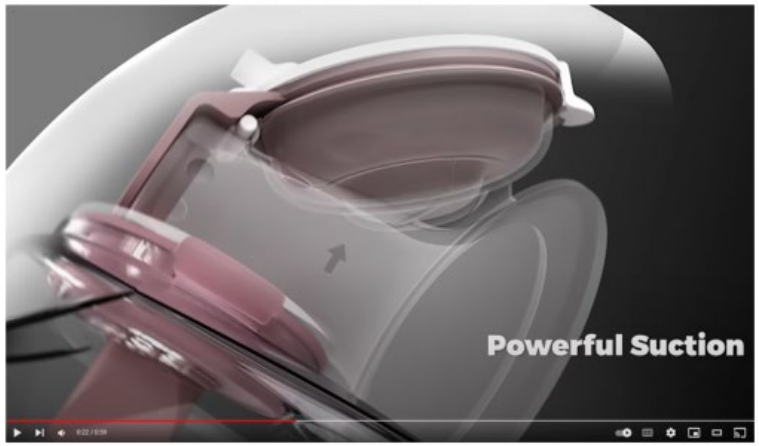
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 “Momcozy Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=UPKrZCbAkHI, at 22 seconds.) When the pump is fully assembled, the outer edge of the diaphragm creates a seal to prevent the milk from entering the air pump.

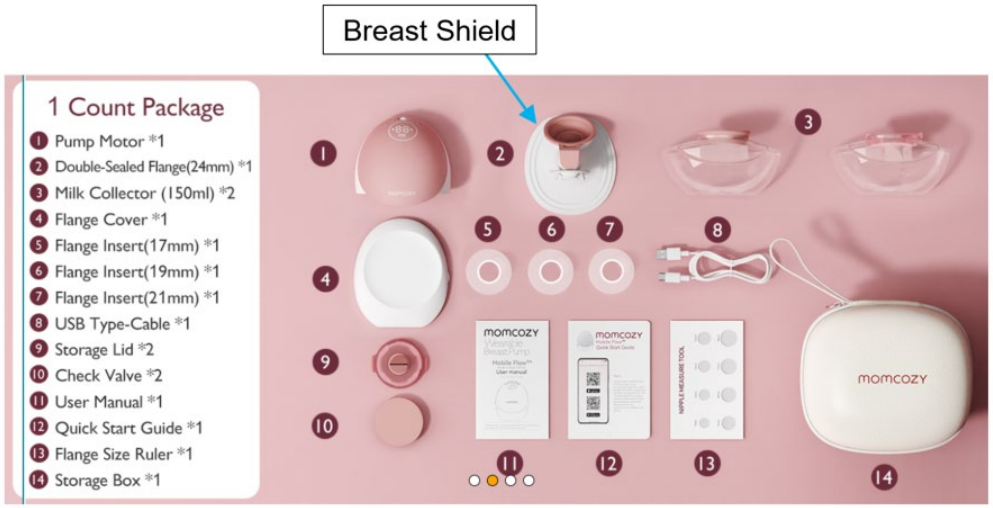
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the '381 Patent.		
Claim Language		**Momcozy Mobile Flow**
1.2	a housing that includes: a battery, and the air pump powered by the battery and configured to generate negative air pressure by driving the diaphragm;	The Momcozy Mobile Flow includes a housing that includes a battery and an air pump powered by the battery and configured to generate negative air pressure by driving the diaphragm.  (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) The Momcozy Mobile Flow housing includes a battery. For example, as shown below, Momcozy states that the Mobile Flow device includes a battery with "large battery capacity, "1800mAh battery life," "6 sessions per charge," and "150 minutes of usage." (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) Further, Momcozy instructs users "[b]efore the first use, charge with the 5V/2A

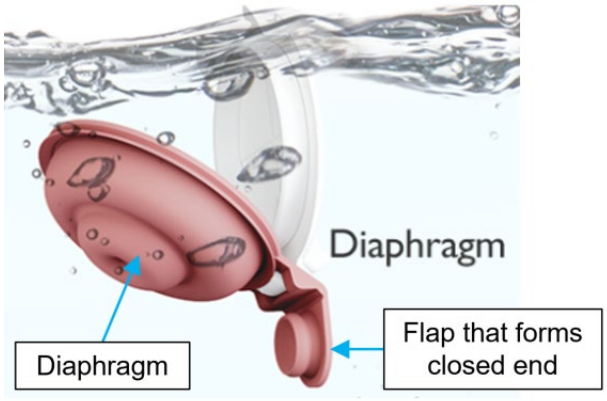
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the '381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		charging adapter until the battery icon is fully lit and solid." (Momcozy "How to Use Mobile Flow™ Hands-free Breast Pump" video, https://www.youtube.com/watch?v=E_V1cCRB6gY, at 13 seconds.) (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) As shown below, the Momcozy Mobile Flow housing includes an air pump powered by the battery and configured to generate negative air pressure. Momcozy states that "[t]he 3rd-gen pump motor offers powerful suction up to -300mmHg to increase milk output," and has "15 intensities [for] customizable settings [and] maximum comfort and milk flow." (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

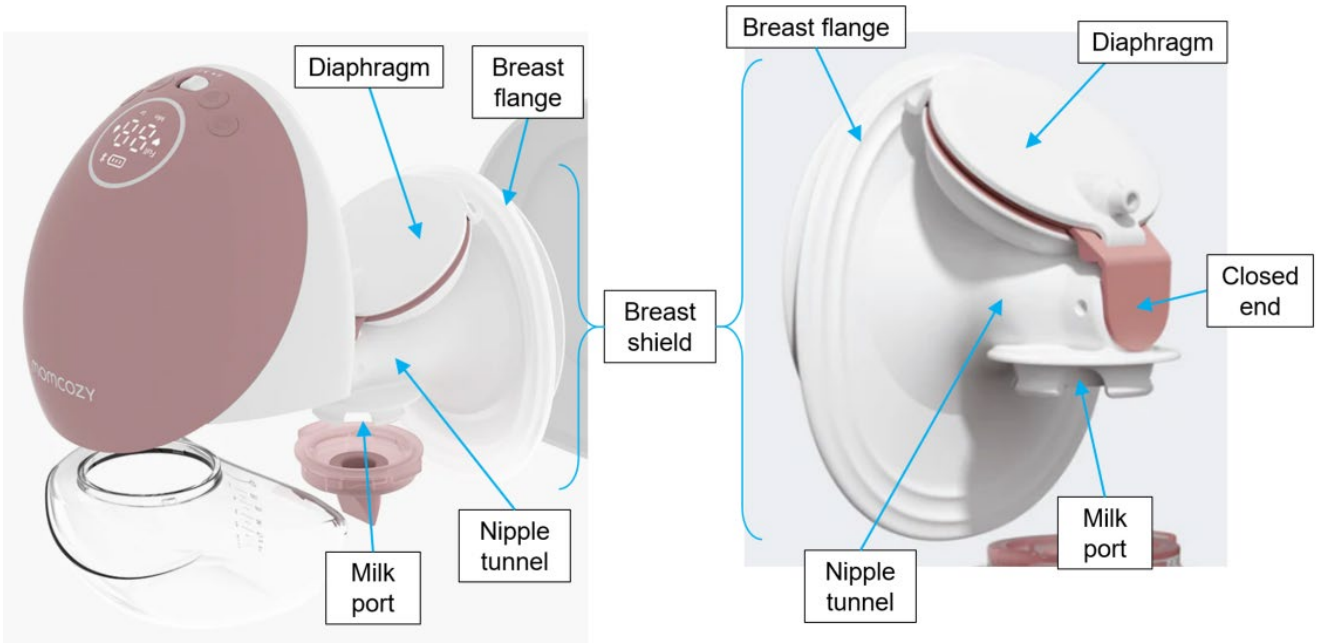
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

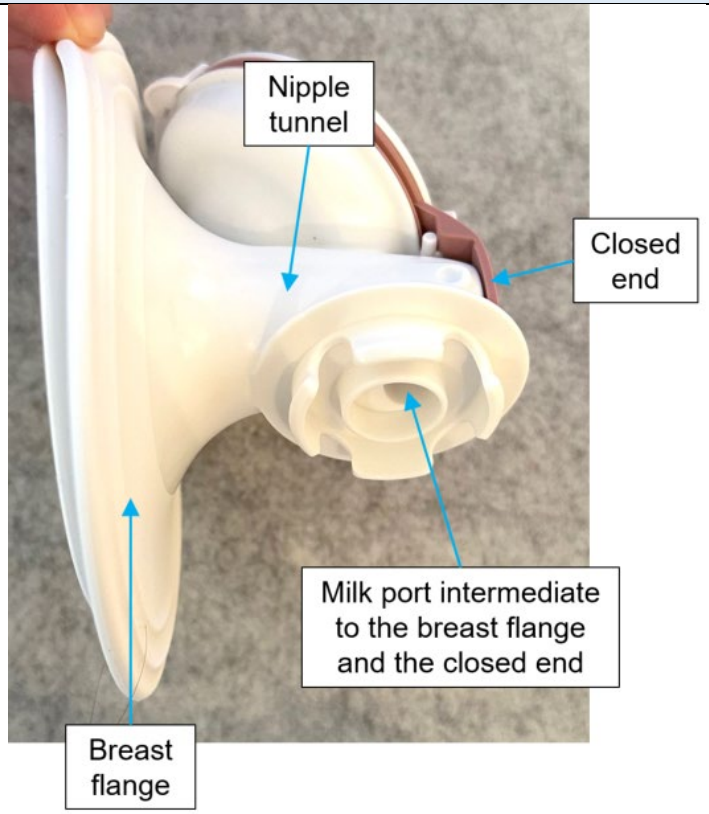
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		The Momcozy Mobile Flow generates negative air pressure by driving the diaphragm. The Momcozy Mobile Flow device includes 15 “adjustable suction levels,” and generates a “vacuum: -300mmHg.” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) As cyclic negative pressure is generated by the pump, the diaphragm deforms to create negative air pressure in the nipple tunnel. (*See* https://www.youtube.com/watch?v=UPKrZCbAkHI, at 22-24 seconds, showing deformation of the diaphragm in response to changes in air pressure caused by the pump.)  Annotated photograph of Mobile Flow device.

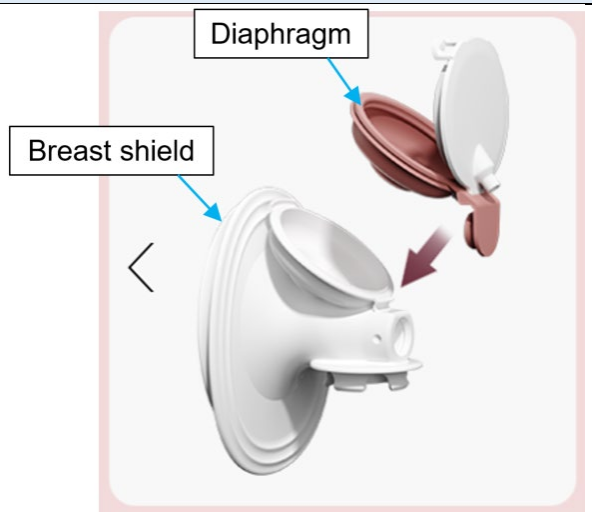
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		   Momcozy “Momcozy Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=UPKrZCbAkHI, at 22-24 seconds.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the '381 Patent.		
Claim Language		**Momcozy Mobile Flow**
1.3	a breast shield comprising a breast flange and a nipple tunnel extending from the breast flange, the nipple tunnel comprising a closed end and a milk port intermediate to the breast flange and the closed end, and the breast shield being separate from the diaphragm; and	Momcozy Mobile Flow includes a breast shield made up of a breast flange and a nipple tunnel. And the Momcozy Mobile Flow's nipple tunnel includes a closed end and a milk port intermediate to the breast flange and the closed end. The Momcozy Mobile Flow breast shield is separate from the diaphragm. The Momcozy Mobile Flow includes a "Double-sealed flange (24mm)." (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)  (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.) As shown below, the Momcozy Mobile Flow's breast shield includes a breast flange and a nipple tunnel extending away from the breast flange. The Mobile Flow's nipple tunnel includes a closed end and a milk

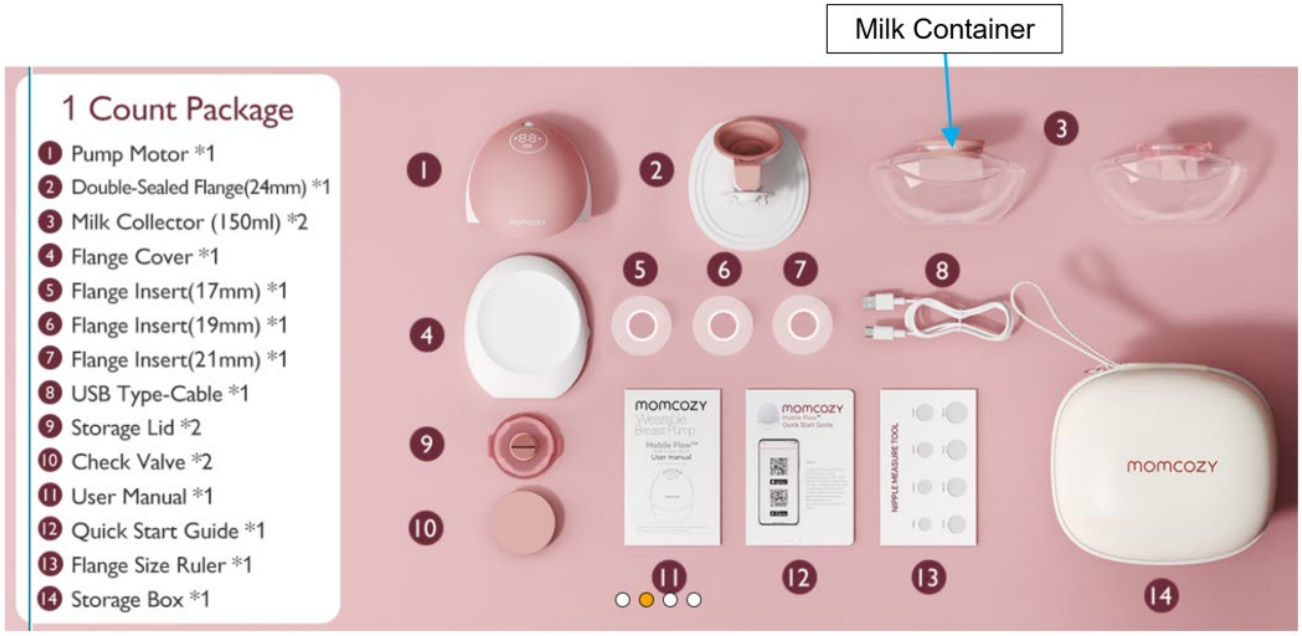
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		port intermediate to the breast flange and the closed end. As shown below, the Momcozy Mobile Flow includes a flap coupled to the diaphragm that closes the end of the nipple tunnel.  (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

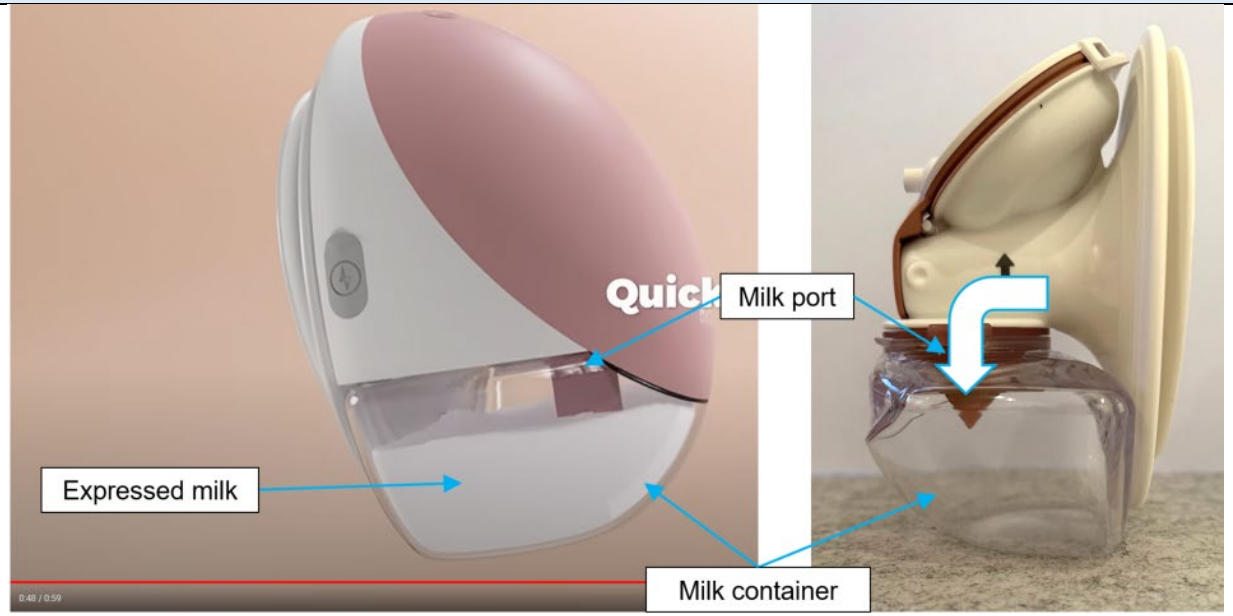
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Annotated photograph of Momcozy Mobile Flow device showing milk port intermediate to the breast flange and the closed end. As shown below, the Momcozy Mobile Flow’s breast shield is separate from the diaphragm.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.) To the extent that the Momcozy Mobile Flow does not literally include a closed end of a nipple tunnel, this claim is met under the doctrine of equivalents. The Momcozy Mobile Flow has a flap that extends from the diaphragm and couples to the end of the nipple tunnel which performs substantially the same function of sealing off an end of the nipple tunnel. Indeed, the flap appears to have no other function other than to close and seal the end of the nipple tunnel, which achieves the same result of preventing expressed milk from leaking from the end of the nipple tunnel such that expressed milk instead drains through the milk port and into the milk container. The Momcozy Mobile Flow flap and nipple tunnel work in substantially the same way by forming a barrier at the end of the nipple tunnel such that expressed milk can only exit the nipple tunnel through the milk port. Further, the differences between a nipple tunnel with a closed end and a nipple tunnel that is closed by a flap, such as in the Momcozy Mobile Flow device, are insubstantial.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		Accordingly, Momcozy Mobile Flow’s flap and nipple tunnel are equivalent to the claimed nipple tunnel with closed end under the doctrine of equivalents.
1.4	a milk container that is configured to attach to the housing and receive expressed milk via the milk port.	The Momcozy Mobile Flow includes a milk container that is configured to attach to the housing and receive expressed milk via the milk port. Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 3 minutes 5 seconds.) The Momcozy website indicates that the Mobile Flow has a “bottle capacity: 150ml.” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

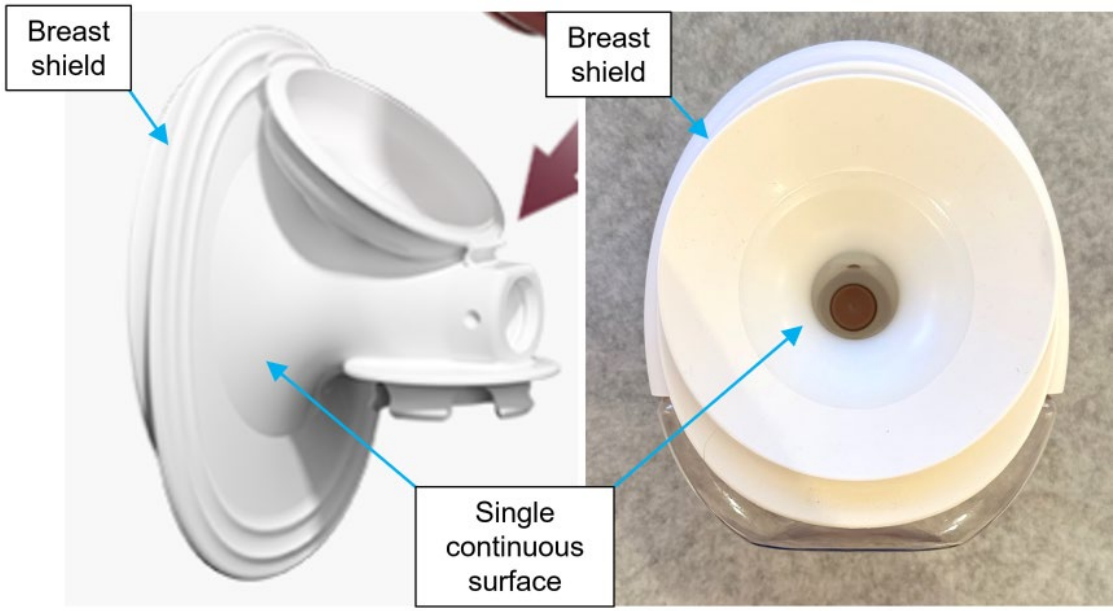
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) The Momcozy Mobile Flow milk container is configured to attach to the housing, via the breast shield’s connection with the housing.

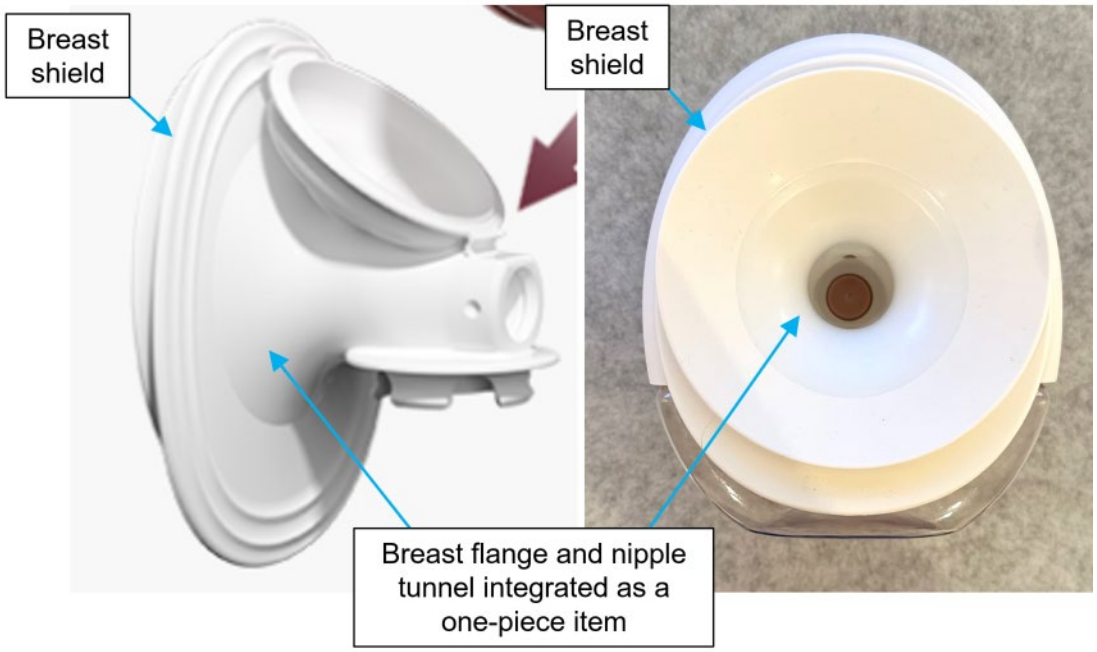
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump; https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) The Momcozy Mobile Flow’s milk container receives milk through the milk port which is located inside the milk container.

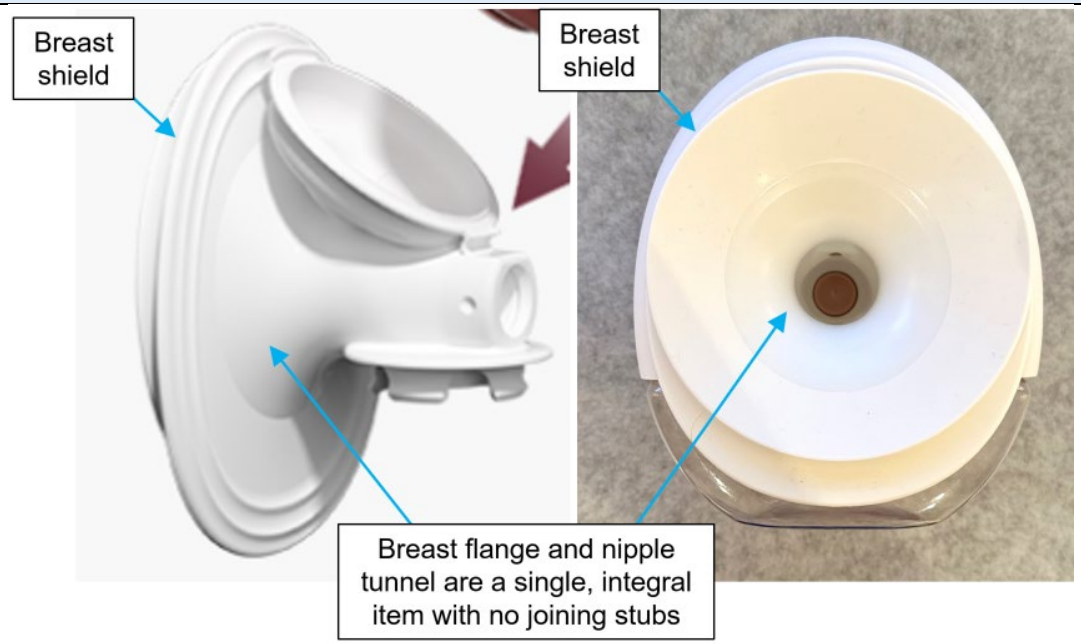
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (Momcozy “Momcozy Mobile Flow™ Hands-free Breast Pump” video, https://www.youtube.com/watch?v=UPKrZCbAkHI, at 48 seconds; annotated photograph of Momcozy Mobile Flow device.) To the extent that the Momcozy Mobile Flow does not literally attach the milk container to the housing, this claim is met under the doctrine of equivalents. The Momcozy Mobile Flow’s milk container is configured to attach to the housing, via the breast shield’s connection with the housing. This attachment of the milk container performs substantially the same function as the claimed attachment of mounting the milk container relative to the housing in a compact arrangement. The attachment between the milk container, breast shield, and housing achieves the same result of positioning the milk container and housing in a compact arrangement such that the Mobile Flow device can be in-bra wearable. This attachment

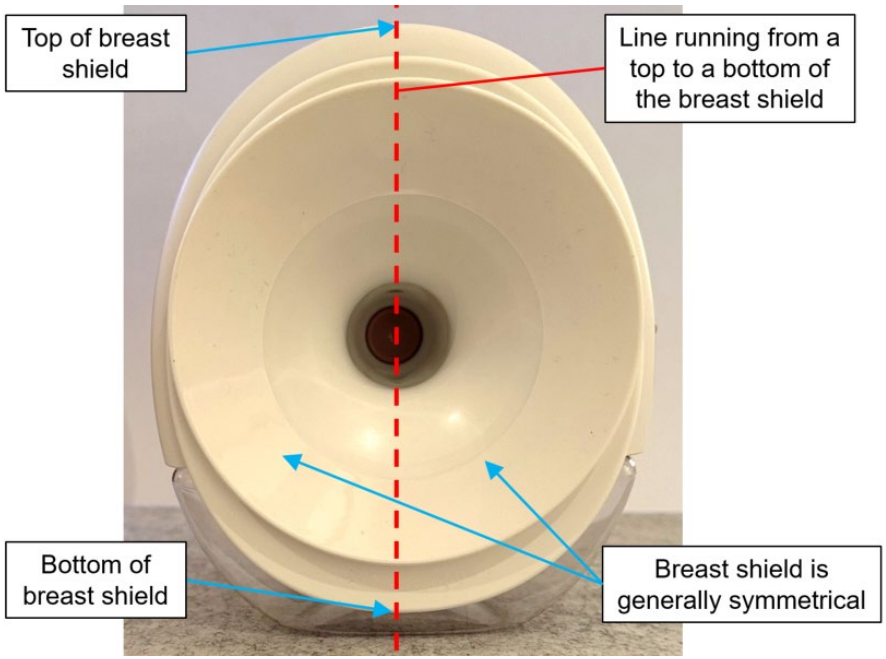
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the '381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		between the milk container, breast shield, and housing works in substantially the same way using a mechanical attachment configuration to couple the components together with a "click" fit. (*See* Momcozy "How to Use Mobile Flow™ Hands-free Breast Pump" video, https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 18 seconds.) Further, the differences between a milk container that attaches directly to a housing and a milk container that attaches to a housing via a breast shield, such as in the Momcozy Mobile Flow device, are insubstantial. Accordingly, Momcozy Mobile Flow's attachment of the milk container to the housing is equivalent to the claimed attachment under the doctrine of equivalents.
2	The breast pump device of claim 1, wherein the breast shield is configured to rotate smoothly around a nipple inserted into the nipple tunnel to provide a correct positioning of the breast shield onto a breast.	*See* claim 1. The Momcozy Mobile Flow includes a breast shield configured to rotate smoothly around a nipple inserted into the nipple tunnel to provide a correct positioning of the breast shield onto a breast. For example, as shown below, the Momcozy Mobile Flow is advertised as including "More Fit & Discreet: Mobile Flow breast pump adopts DoubleFit Flange combining soft and hard silicone to ensure better comfort and safety." (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) Further, as shown below, the surface of the breast shield is smooth and allows rotation around the nipple to properly align the nipple tunnel around the user's nipple.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)
3	The breast pump device of claim 1, wherein the breast shield is a one-piece item that, in use, presents a single continuous surface to a nipple and a breast.	*See* claim 1. The Momcozy Mobile Flow’s breast shield is a one-piece item that, in use, presents a single continuous surface to a nipple and a breast. For example, Momcozy advertises that the Momcozy Mobile Flow “DoubleFit Flange . . . [p]romotes milk supply with a snug, comfortable fit, while minimizing milk leakage.” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		As shown below, the breast shield presents a single continuous surface to a nipple and a breast.  (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp; annotated photograph of Momcozy Mobile Flow device.)
4	The breast pump device of claim 1, wherein the breast shield integrates the breast flange and nipple tunnel as a one-piece item.	*See* claim 1. The Momcozy Mobile Flow’s breast shield integrates the breast flange and nipple tunnel as a one-piece item. For example, as shown below, the breast shield integrates the breast flange and the nipple tunnel as a one-piece item.

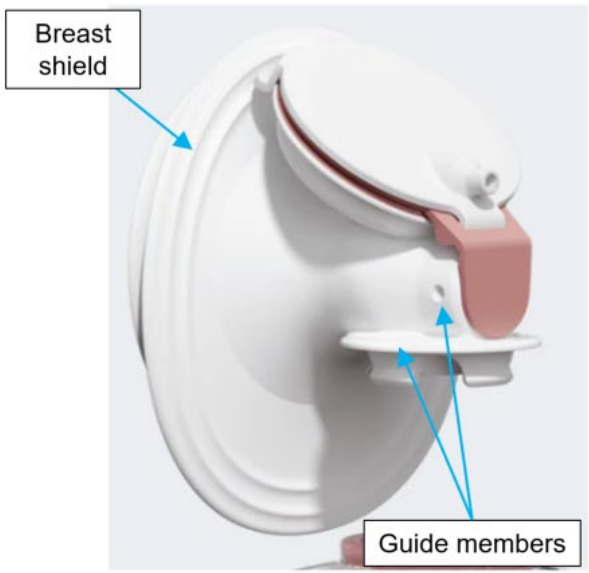
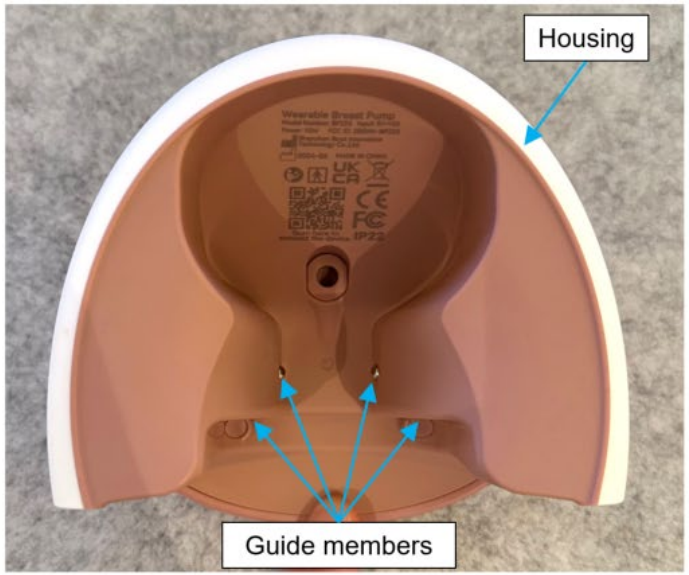
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp; annotated photograph of Momcozy Mobile Flow device.)
5	The breast pump device of claim 1, wherein the breast flange and the nipple tunnel are a single, integral item with no joining stubs.	*See* claim 1. The Momcozy Mobile Flow’s breast flange and nipple tunnel are a single, integral item with no joining stubs. For example, as shown below, the breast flange and the nipple tunnel are a single, integral item with no joining stubs.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp; annotated photograph of Momcozy Mobile Flow device.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
6	The breast pump device of claim 1, wherein the breast shield is generally symmetrical about a centre-line running from a top to a bottom of the breast shield when positioned upright for normal use.	*See* claim 1. The Momcozy Mobile Flow’s breast shield is generally symmetrical about a centre-line running from a top to a bottom of the breast shield when positioned upright for normal use. As shown below, the Momcozy Mobile Flow includes a breast shield that is generally symmetrical about a centre-line running from a top to a bottom of the breast shield when positioned upright for normal use.  Annotated photograph of Momcozy Mobile Flow device.

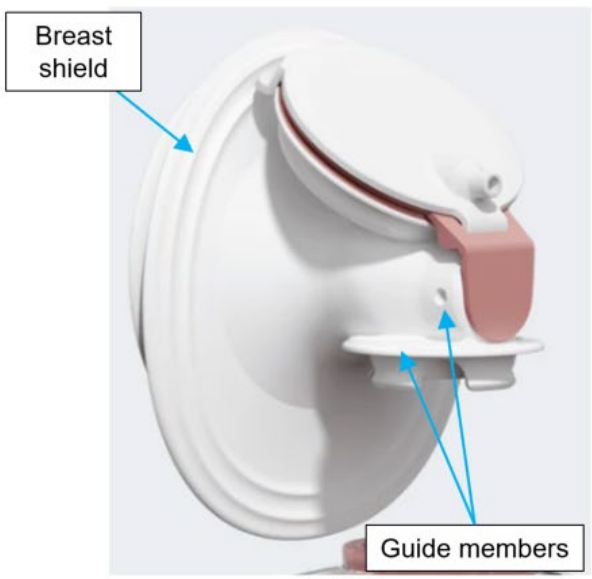
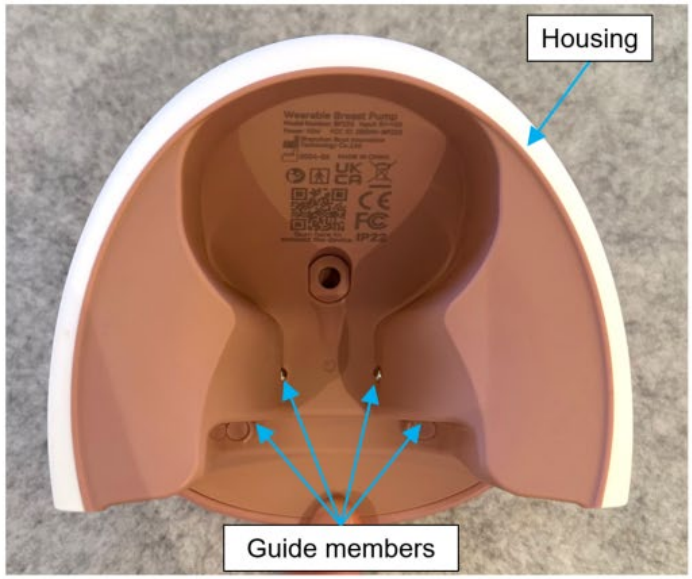
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
7	The breast pump device of claim 1, wherein the breast shield is configured to slide in and out from the housing, together with the diaphragm, on guide members in the breast shield.	*See* claim 1. The Momcozy Mobile Flow’s breast shield is configured to slide in and out from the housing, together with the diaphragm, on guide members in the breast shield. As shown below, the Momcozy Mobile Flow’s housing is configured to slide onto the breast shield using guide members. The Momcozy Mobile Flow advertising material instructs a user to “assemble the pump motor and flange without gaps.” (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		(https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) The sliding attachment of the breast shield and diaphragm with the housing is shown in the Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, screen shot reproduced below. (Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 15 seconds.)

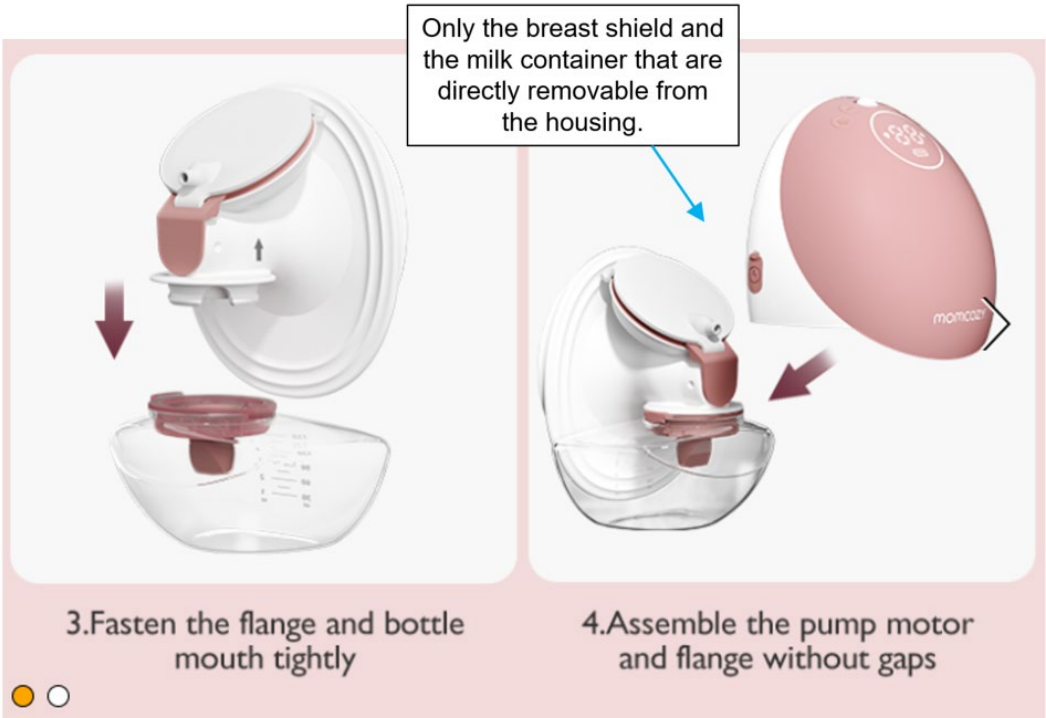
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		To facilitate the sliding attachment between the breast shield and housing, both the breast shield and housing include guide members to guide the housing over the nipple tunnel and onto the breast shield. For example, as shown below the housing includes protruding attachment features that locate in recesses on the nipple tunnel of the breast shield. The housing also includes multiple contoured surfaces that correspond to the exterior profile of the nipple tunnel to guide the housing over the nipple tunnel of the breast shield.   (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump; annotated photograph of Momcozy Mobile Flow housing.)

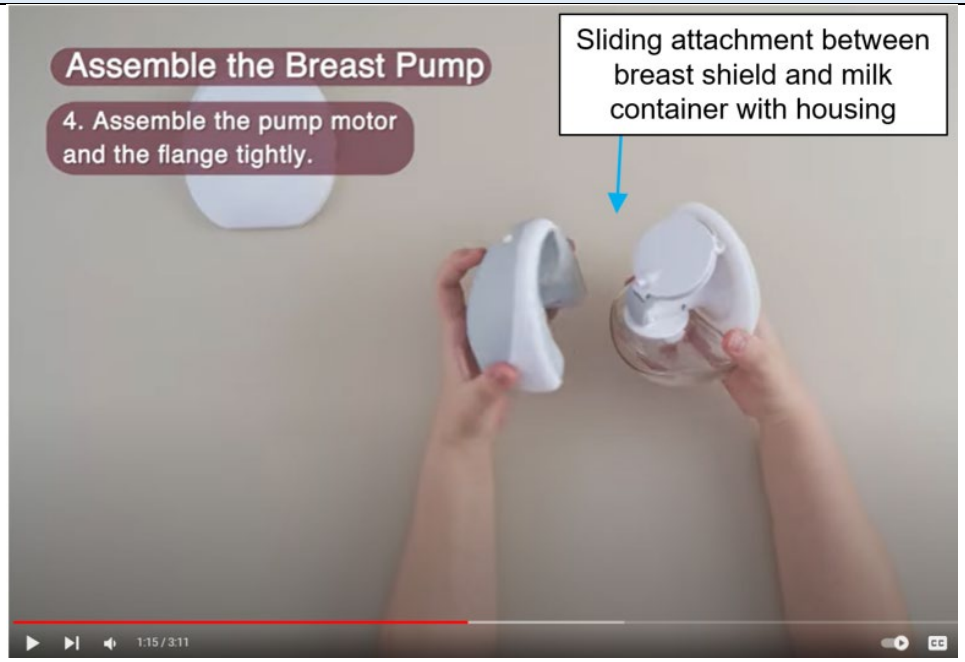
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the '381 Patent.		
Claim Language		**Momcozy Mobile Flow**
8	The breast pump device of claim 1, wherein the housing is configured to slide onto the breast shield, when the breast shield has been placed onto a breast, using guide members.	*See* claim 1. The Momcozy Mobile Flow's housing is configured to slide onto the breast shield, when the breast shield has been placed onto a breast, using guide members. As shown below, the Momcozy Mobile Flow's housing is configured to slide onto the breast shield using guide members. The Momcozy Mobile Flow advertising material instructs a user to "assemble the pump motor and flange without gaps." (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.) (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		The sliding attachment of the breast shield with the housing is shown in the Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, screen shot reproduced below. (Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 15 seconds.) To facilitate the sliding attachment between the breast shield and housing, both the breast shield and housing include guide members to guide the housing over the nipple tunnel and on to the breast shield. For example, as shown below the housing includes protruding attachment features that locate in recesses on the

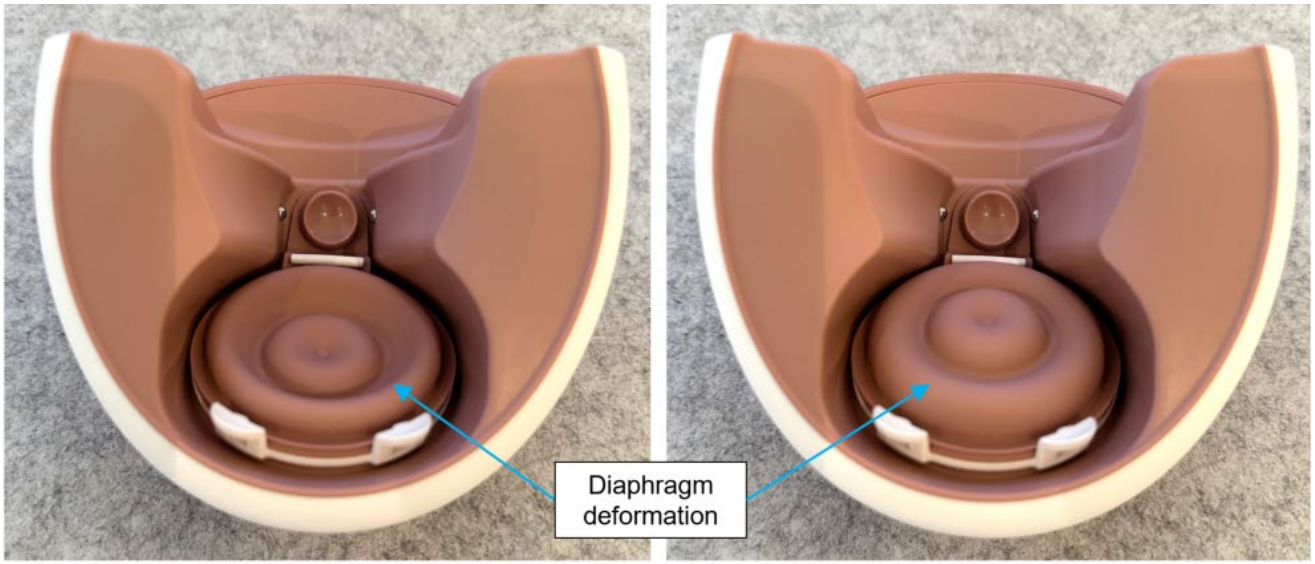
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		nipple tunnel of the breast shield. The housing also includes multiple contoured surfaces that correspond to the exterior profile of the nipple tunnel to guide the housing over the nipple tunnel of the breast shield.   (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump; annotated photographs of Momcozy Mobile Flow housing.)

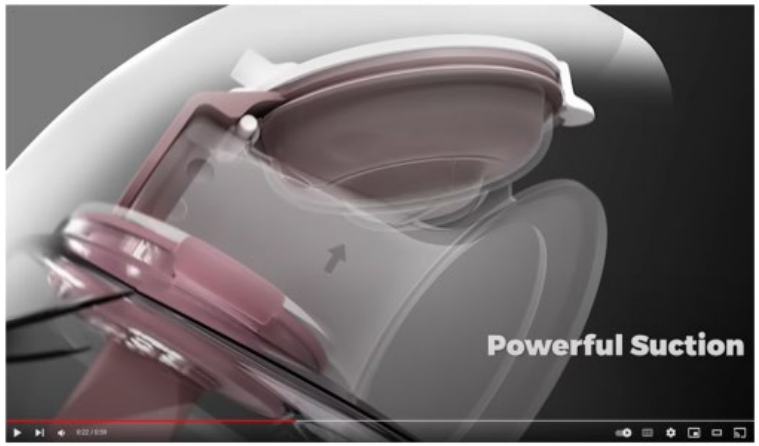
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
9	The breast pump device of claim 1, wherein the breast pump device includes only the breast shield and the milk container that are directly removable from the housing in normal use or normal dis-assembly.	*See* claim 1. The Momcozy Mobile Flow device includes only the breast shield and the milk container that are directly removable from the housing in normal use or normal dis-assembly. As shown below, the Momcozy Mobile Flow’s breast shield and milk container slide into attachment with the housing and are the only component that slideably attach to the housing. The Momcozy Mobile Flow advertising material instructs a user to “fasten the flange and bottle mouth tightly . . . [and] assemble the pump motor and flange without gaps.” (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

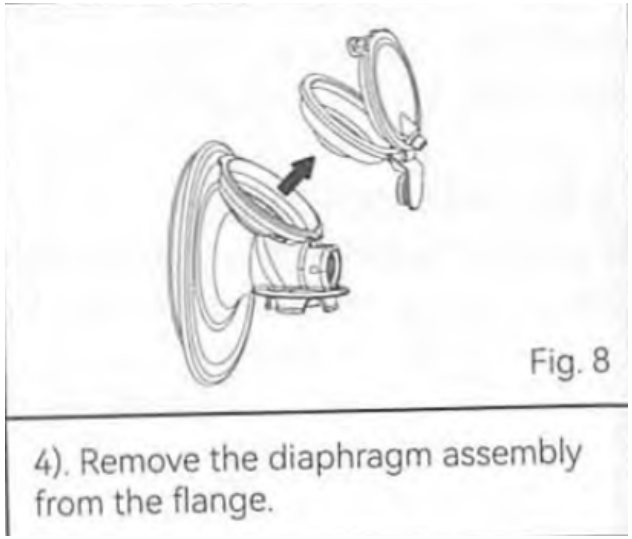
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.) The sliding attachment of the breast shield and milk container with the housing is shown in the Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, screen shot reproduced below.

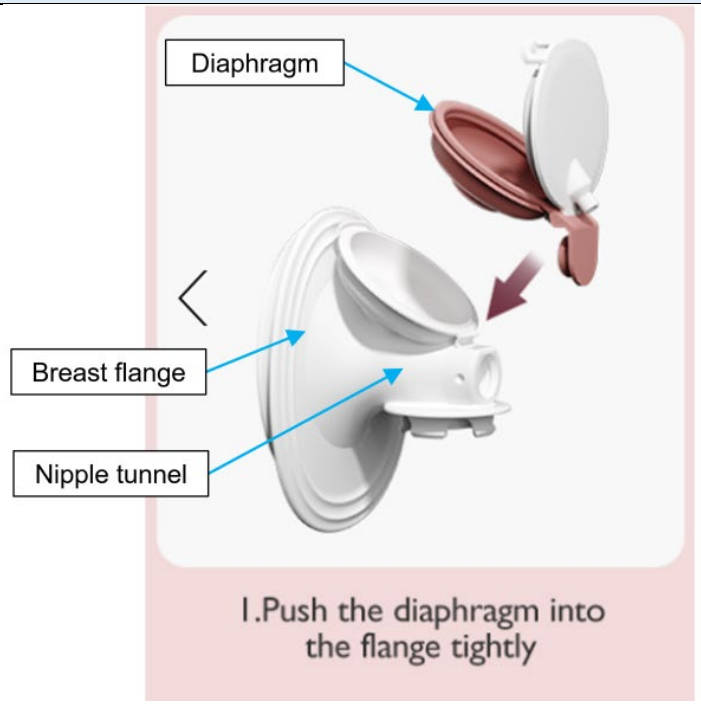
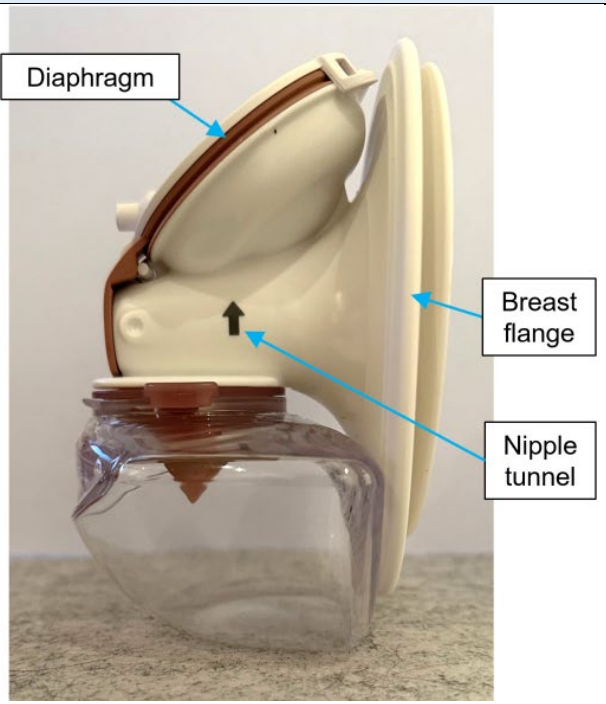
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 15 seconds.) To the extent that the diaphragm and diaphragm housing component are not literally part of the breast shield, this claim is met under the doctrine of equivalents. The Momcozy Mobile Flow diaphragm is assembled to and moves with the breast shield such that the assembly of the breast shield and diaphragm perform substantially the same function of directly coupling to the housing with a single push. Indeed, the combined assembly of the breast shield and diaphragm achieves the same result of simplifying the breast pump device assembly by easily removing washable parts from the non-washable housing in a single step. The Momcozy Mobile Flow breast shield and diaphragm work in substantially the same way by allowing

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		the user to assemble the device with a single push or pull to either assemble or disassemble the device. Further, the differences between assembling the breast shield directly to the housing and assembling the breast shield and diaphragm assembly to the housing are insubstantial. Accordingly, Momcozy Mobile Flow’s breast shield and diaphragm assembly are equivalent to the claimed breast shield being directly removable from the housing under the doctrine of equivalents.
11	The breast pump device of claim 1, wherein the diaphragm is a membrane, and the diaphragm deforms in response to changes in air pressure caused by the air pump to create negative air pressure in the nipple tunnel.	*See* claim 1. The Momcozy Mobile Flow’s diaphragm is a membrane, and the diaphragm deforms in response to changes in air pressure caused by the air pump to create negative air pressure in the nipple tunnel. As shown below, the Momcozy Mobile Flow diaphragm is a membrane. Photograph of Momcozy Mobile Flow diaphragm. The Momcozy Mobile Flow device includes 15 “adjustable suction levels,” and generates a “vacuum: -300mmHg.” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		As cyclic negative pressure is generated by the pump, the diaphragm deforms to create negative air pressure in the nipple tunnel. (*See* https://www.youtube.com/watch?v=UPKrZCbAkHI, at 22-24 seconds, showing deformation of the diaphragm in response to changes in air pressure caused by the pump.)  Annotated photographs of Mobile Flow device

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		   Momcozy “Momcozy Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=UPKrZCbAkHI, at 22-24 seconds.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
12	The breast pump device of claim 1, wherein the diaphragm is removable from a diaphragm holder that sits above the breast flange and the nipple tunnel.	*See* claim 1. The Momcozy Mobile Flow’s diaphragm is removable from a diaphragm holder that sits above the breast flange and the nipple tunnel. The Momcozy Mobile Flow User Manual instructs users to “Remove the diaphragm assembly from the flange.” (Momcozy Mobile Flow User Manual, p. 13.)  (Momcozy Mobile Flow User Manual, p. 13.) As shown below, the diaphragm is removable from the diaphragm holder and the diaphragm holder sits above the breast flange and the nipple tunnel.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the '381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		  (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp; annotated photographs of Momcozy Mobile Flow device.)
13	The breast pump device of claim 1, wherein the milk container is substantially rigid.	*See* claim 1. The Momcozy Mobile Flow's milk container is substantially rigid. For example, the Momcozy Mobile Flow includes a "Milk Collector." (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) The milk container is made of a plastic material that is substantially rigid.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
14	The breast pump device of claim 1, wherein the milk container is configured to attach to a lower part of the housing and to form a flat bottomed base for the breast pump device.	*See* claim 1. The Momcozy Mobile Flow’s milk container is configured to attach to a lower part of the housing and to form a flat-bottomed base for the breast pump device. The Momcozy Mobile Flow milk container is configured to be attached to and removed from a lower part of the housing, via the breast shield’s connection with the housing. (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) To the extent that the Momcozy Mobile Flow does not literally attach the milk container to a lower part of the housing, this claim is met under the doctrine of equivalents. The Momcozy Mobile Flow’s milk

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		container is configured to attach to a lower part of the housing, via the breast shield’s connection with the housing. This attachment of the milk container performs substantially the same function as the claimed attachment of mounting the milk container below the housing in a compact arrangement. The attachment between the milk container, breast shield, and housing achieves the same result of positioning the milk container below the housing in a compact arrangement such that the Mobile Flow device can be in-bra wearable. This attachment between the milk container, breast shield, and housing works in substantially the same way using a mechanical attachment configuration to couple the components together with a “click” fit. (*See* Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 18 seconds.) Further, the differences between a milk container that attaches directly to a lower part of a housing and a milk container that attaches to a lower part of a housing via a breast shield, such as in the Momcozy Mobile Flow device, are insubstantial. Accordingly, Momcozy Mobile Flow’s attachment of the milk container to a lower part of the housing is equivalent to the claimed attachment under the doctrine of equivalents.

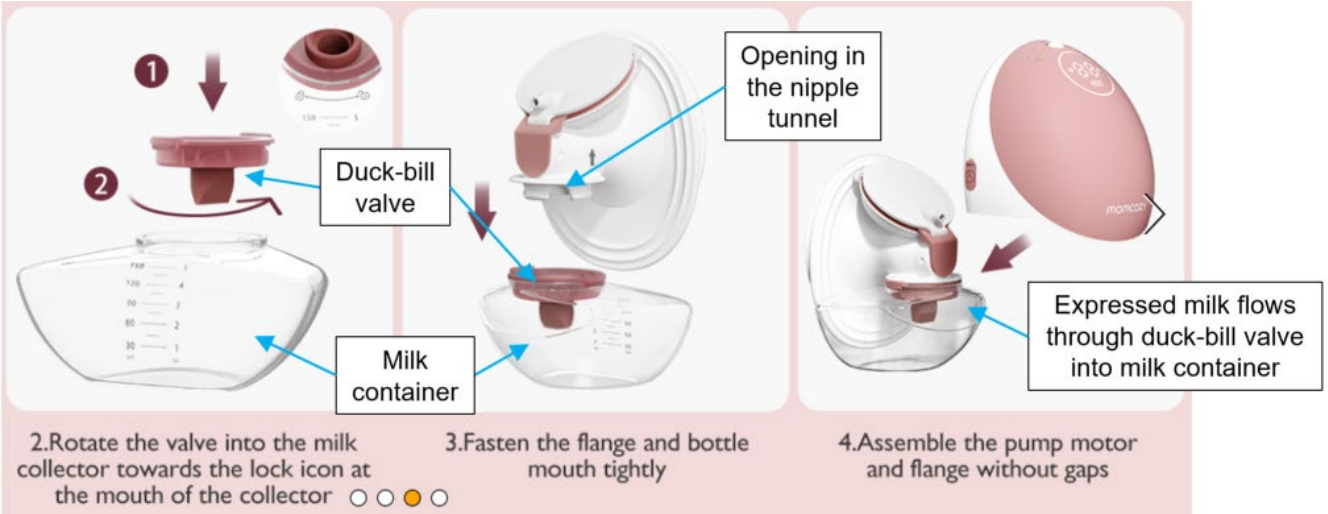
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) The Momcozy Mobile Flow includes “Stackable Milk Collectors” facilitated by the flat bottom base serving as the base of the milk container. (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

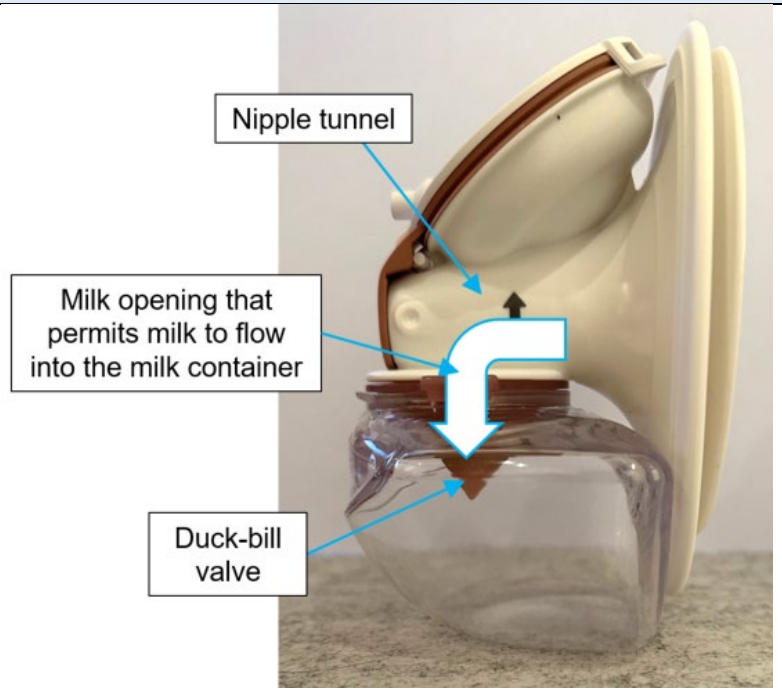
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Stackable Milk Collectors Effortlessly organize your breast milk storage while you're on the move. (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

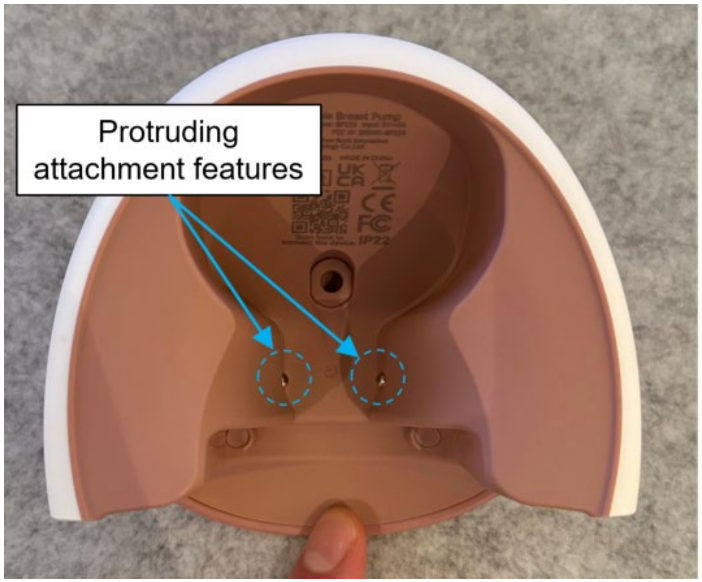
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
15	The breast pump device of claim 1, wherein the milk container has a surface shaped to continue a curved shape of the housing, so that the breast pump device can be held comfortably inside the bra.	*See* claim 1. The Momcozy Mobile Flow’s milk container has a surface shaped to continue a curved shape of the housing, so that the breast pump device can be held comfortably inside the bra. (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
16	The breast pump device of claim 1, wherein the milk container includes a flexible valve that self-seals under negative air pressure against the milk port in the nipple tunnel and that permits the expressed milk to flow into the milk container.	*See* claim 1. The Momcozy Mobile Flow’s milk container includes a flexible valve that self-seals under negative air pressure against the milk port in the nipple tunnel and that permits the expressed milk to flow into the milk container. The Momcozy Mobile Flow device is supplied with two “Duckbill Valve[s].” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 ((https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

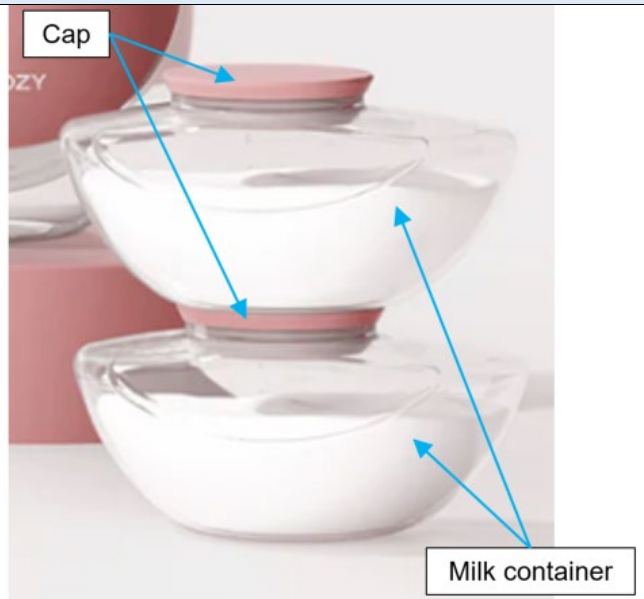
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		As shown below, expressed milk flows under gravity through an opening in the nipple tunnel and into the milk container through the duckbill valve. On information and belief, the duckbill valve stays sealed when there is negative air pressure being applied by the pump to ensure that negative air pressure is not applied to the milk container.  (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Annotated photograph of Momcozy Mobile Flow device.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
17	The breast pump device of claim 1, wherein the milk container is attachable to the housing with a mechanical or magnetic mechanism that releasably attaches or latches when the milk container is sufficiently pressed on to the housing with a single push action.	*See* claim 1. The Momcozy Mobile Flow’s milk container is attachable to the housing with a mechanical or magnetic mechanism that releasably attaches or latches when the milk container is sufficiently pressed on to the housing with a single push action. The Momcozy Mobile Flow housing and breast shield attach to the housing with a mechanical mechanism. As shown below, the housing include a pair of protruding bearings that engage with recesses on the breast shield, which is attached to the milk container.  (Annotated photograph of Momcozy Mobile Flow device; https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		The Momcozy “How to Use Mobile Flow” video instructs a user to “assemble to the pump motor and the flange tightly,” and shows a single push action to assemble the parts. The video further shows that when connected properly, the mechanical mechanism “clicks” into place. Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 18 seconds.)

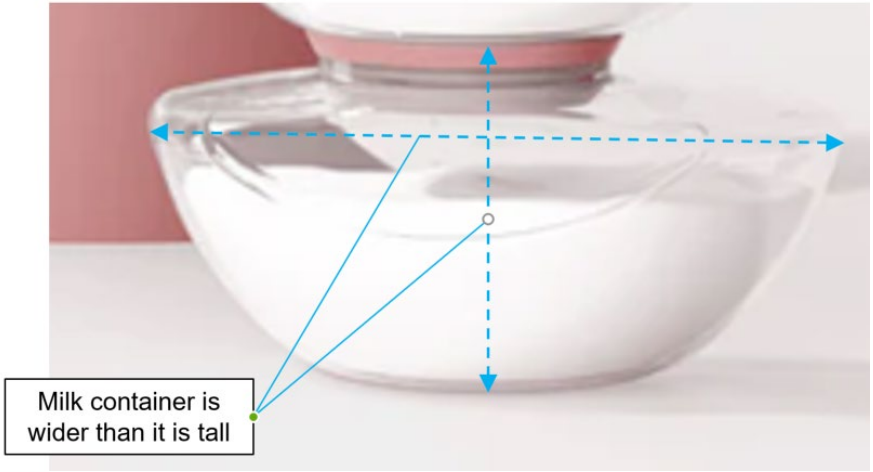
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the '381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		To the extent that the Momcozy Mobile Flow does not literally attach the milk container to the housing with a mechanical mechanism, this claim is met under the doctrine of equivalents. The Momcozy Mobile Flow's milk container is configured to attach to the housing, via the breast shield's connection with the housing that uses a mechanical mechanism. This attachment of the milk container performs substantially the same function as the claimed attachment of mounting the milk container relative to the housing in a compact arrangement and with a single push action securing mechanism. The attachment between the milk container, breast shield, and housing achieves the same result of securing the milk container relative to the housing such that the milk container does not slip away from or fall out of the housing. This attachment between the milk container, breast shield, and housing works in substantially the same way using a mechanical attachment configuration to couple the components together with a "click" fit. (*See* Momcozy "How to Use Mobile Flow™ Hands-free Breast Pump" video, https://www.youtube.com/watch?v=E_V1cCRB6gY, at 1 minute 18 seconds.) Further, the differences between a milk container that attaches directly to a housing and a milk container that attaches to a housing via a breast shield, such as in the Momcozy Mobile Flow device, are insubstantial. Accordingly, Momcozy Mobile Flow's attachment of the milk container to the housing is equivalent to the claimed attachment under the doctrine of equivalents.
18	The breast pump device of claim 1, wherein the milk container includes a cap that is removable from the milk container and a removable valve that enables milk to pass into the milk container in one direction.	*See* claim 1. The Momcozy Mobile Flow's milk container includes a cap that is removable from the milk container and a removable valve that enables milk to pass into the milk container in one direction. The Momcozy Mobile Flow device includes a "silicone lid" that seals the milk container. (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.) Momcozy states that the milk container and cap provide "Convenient Storage," and that a user can "[j]ust seal with the silicone lid and put it in the bag or refrigerator. No need to transfer into the breastmilk bags. One Step Store, Keep Milk Clean." (*Id.*)

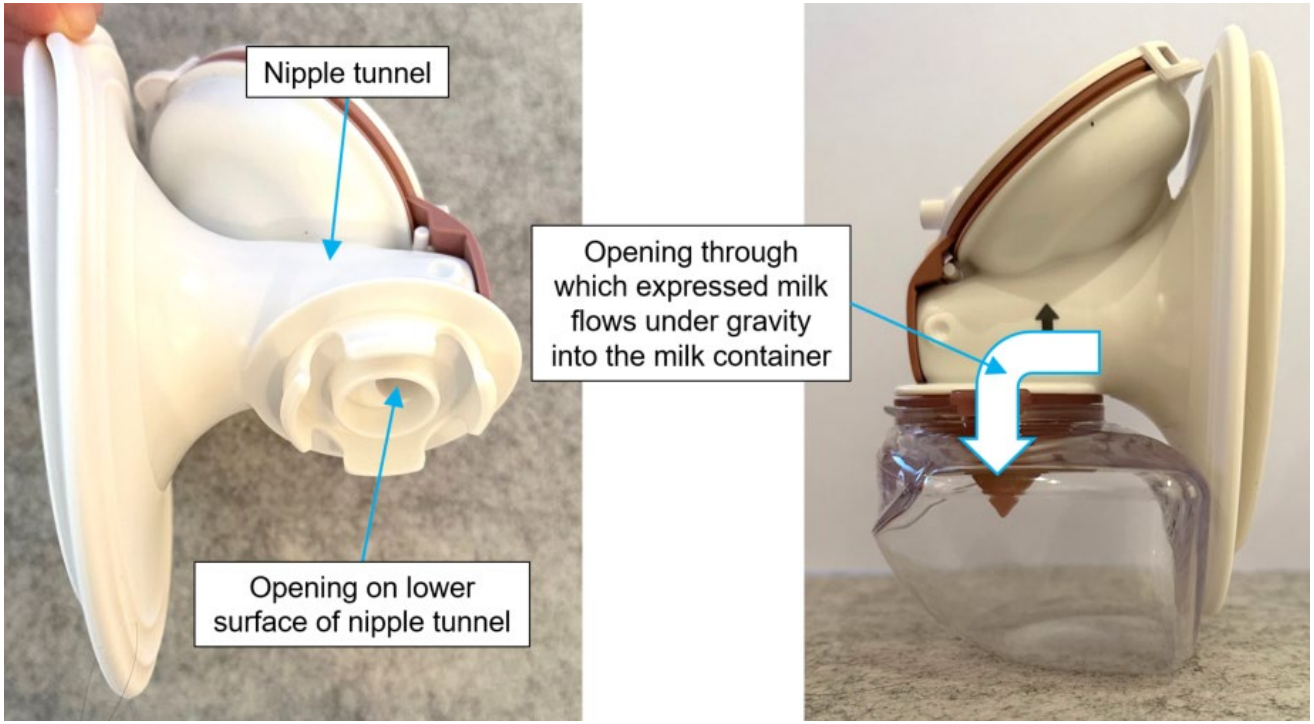
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp; https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

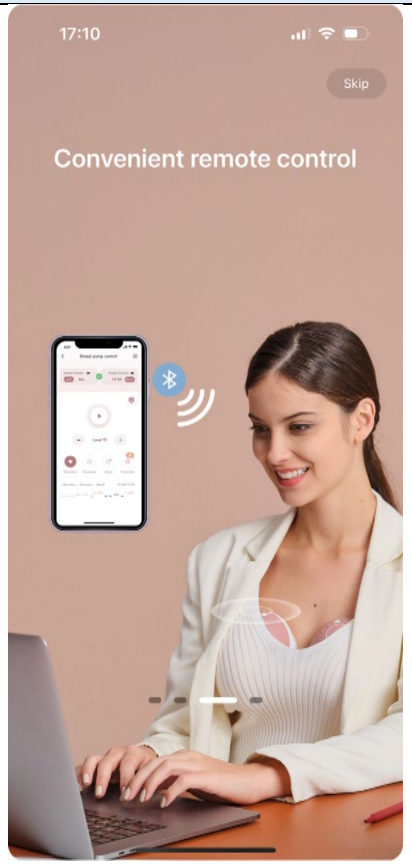
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		As shown in Momcozy’s “How to Use Mobile Flow” video, the Momcozy Mobile Flow device includes a removable valve that enables milk to pass into the milk container. The removable valve enables milk to pass into the milk container in one direction. Momcozy “How to Use Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=E_V1cCRB6gY, at 3 minutes 0 seconds.)

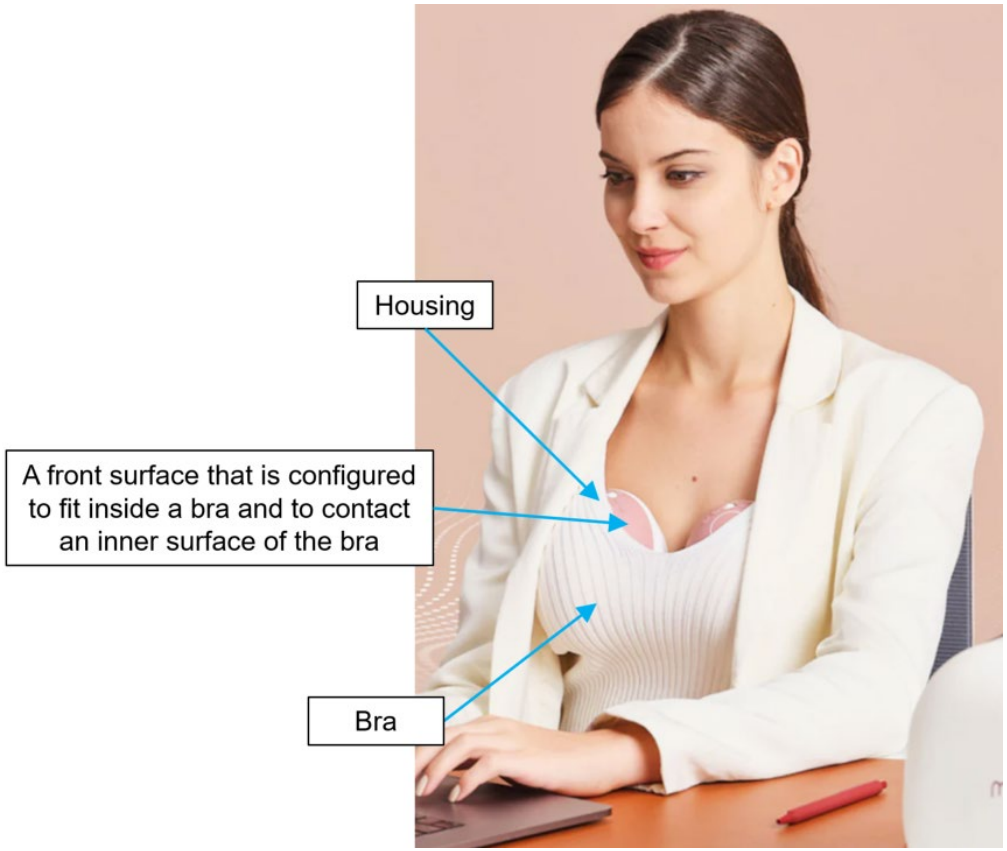
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

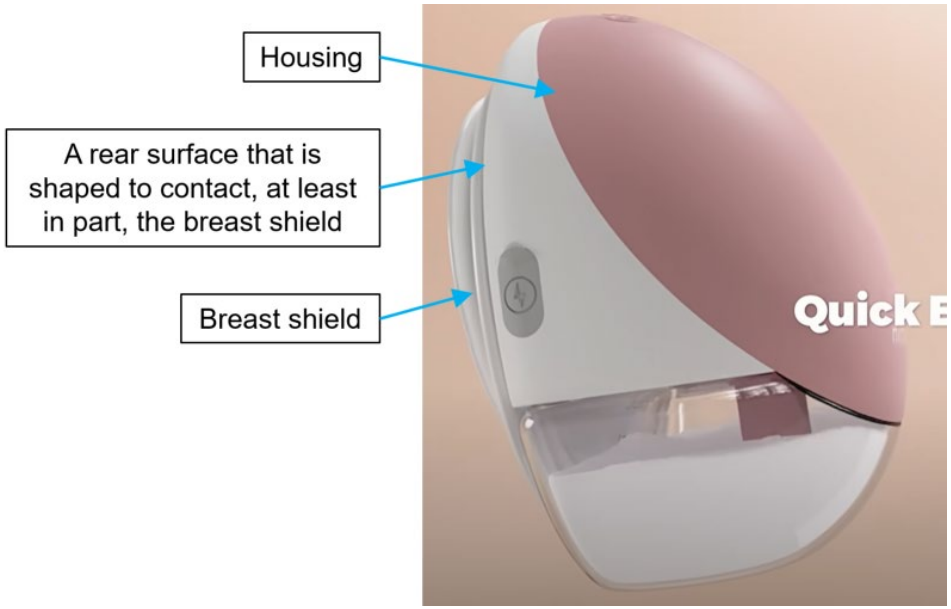
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
20	The breast pump device of claim 1, wherein the milk container is wider than the milk container is tall.	*See* claim 1. The Momcozy Mobile Flow’s milk container is wider than the milk container is tall.  (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

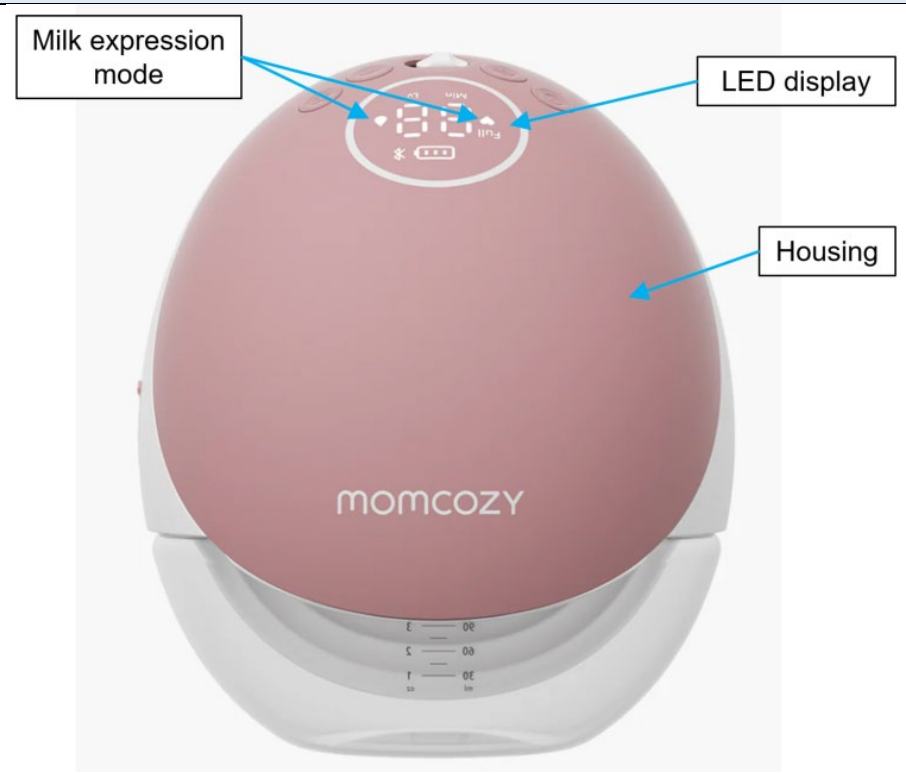
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
21	The breast pump device of claim 1, wherein the nipple tunnel includes on a lower surface the milk port through which the expressed milk flows under gravity into the milk container.	*See* claim 1. The Momcozy Mobile Flow’s nipple tunnel includes on a lower surface of the milk port through which the expressed milk flows under gravity into the milk container. As shown below, an opening is formed on the lower surface of the nipple tunnel in the Momcozy Mobile Flow device. Expressed milk flows through the opening under gravity into the milk container.  Annotated photographs of Momcozy Mobile Flow Breast Shield.

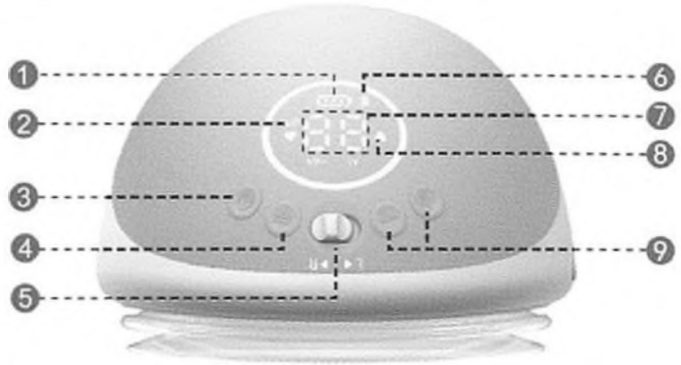
The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
22	The breast pump device of claim 1, wherein the housing includes a wireless data communication system powered by the battery.	*See* claim 1. The Momcozy Mobile Flow’s housing includes a wireless data communication system powered by the battery. The Momcozy Mobile Flow device is wirelessly controlled via an app. “Smart Pumping: Control the Mobile Flow via the "Momcozy" app to start/pause/countdown pumping and switch to different pumping settings. No need to reach into your bra! Record every breastmilk yield to track your pumping history. Know yourself better, Pump on your terms.” (https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp&th=1.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Momcozy App, Quick Start Guide. On information and belief, the Momcozy Mobile Flow’s wireless data communications system is powered by the battery.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
23	The breast pump device of claim 1, wherein the housing has a front surface that is configured to fit inside a bra and to contact an inner surface of the bra, and a rear surface that is shaped to contact, at least in part, the breast shield.	*See* claim 1. The Momcozy Mobile Flow’s housing has a front surface that is configured to fit inside a bra and to contact an inner surface of the bra and a rear surface that is shaped to contact, at least in part, the breast shield.  ((https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.)

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 Momcozy “Momcozy Mobile Flow™ Hands-free Breast Pump” video, (https://www.youtube.com/watch?v=UPKrZCbAkHI, at 48 seconds.)
24	The breast pump device of claim 1, wherein the housing includes at least one of a visual or haptic indicator that indicates whether milk is flowing or not flowing into the milk container.	*See* claim 1. The Momcozy Mobile Flow’s housing includes at least one of a visual or haptic indicator that indicates whether milk is flowing or not flowing into the milk container.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) As shown above, the Momcozy Mobile Flow includes an LED display. The LED display indicates a milk overflow condition and which mode the device is in when expressing milk.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		 1 Battery Display 2 Milk Overflow Reminder 3 Long Press: Turn On / Off Short Press: Pause/ Continue 4 Mode Selection 5 Switching Direction 6 Bluetooth Indicator 7 Running Time / Suction Level Display 8 Mode Indicator 9 Increase / Decrease (Momcozy Mobile Flow Quick Start Guide, p. 6.)
26	The breast pump device of claim 1, wherein the air pump comprises a piezo air pump system.	*See* claim 1. The Momcozy Mobile Flow includes an air pump. To the extent the Momcozy Mobile Flow does not include a piezo pump, the Momcozy Mobile Flow’s pump performs the same function, in substantially the same way, and achieves the same result as a piezo air pump system, and accordingly meets all elements of claim 2 under the doctrine of equivalents.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the ’381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		The Momcozy Mobile Flow housing includes a pump configured to generate negative air pressure. The Momcozy website states that “[t]he 3rd-gen pump motor offers powerful suction up to -300mmHg to increase milk output,” and has “15 intensities [for] customizable settings for maximum comfort and milk flow.” (https://momcozy.com/products/momcozy-mobile-flow-hands-free-breast-pump.) As shown below, Momcozy shows an illustration of the pump within the housing.

The Momcozy Mobile Flow includes, literally or under the doctrine of equivalents, every element of claims 1-9, 11-18, 20-24, 26, and 29 of the '381 Patent.		
Claim Language		**Momcozy Mobile Flow**
		(https://www.amazon.com/Momcozy-Personalized-Multi-Modes-Independent-Breastmilk/dp/B0CV3NNN5L?ref_=ast_sto_dp.) The Momcozy Mobile Flow includes an air pump system. To the extent the Momcozy Mobile Flow does not literally use a piezo air pump system, this claim is met under the doctrine of equivalents. The Momcozy Mobile Flow's pump and a piezo air pump perform substantially the same function of converting electrical energy into a mechanical movement to drive a diaphragm. This mechanical movement of Momcozy Mobile Flow's air pump achieves the same result as a piezo air pump by producing negative pressure. Both Momcozy Mobile Flow's air pump and a piezo air pump work in substantially the same way by utilizing a mechanical member to drive a diaphragm, thereby producing a pressure change. Accordingly, Momcozy Mobile Flow's air pump is equivalent to the claimed piezo air pump system under the doctrine of equivalents.
29	The breast pump device of claim 1, wherein the air pump is configured to generate negative air pressure with a maximum suction of approximately 240 mmHg.	*See* claim 1. On information and belief, the Momcozy Mobile Flow's air pump is configured to generate negative air pressure with a maximum suction of approximately 240 mmHg. For example, the Momcozy Mobile Flow "has 15 suction levels to choose from." (Momcozy Mobile Flow User Manual, p. 9.)