

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

DUVALL ESPRESSO IP ENFORCEMENT, LLC,
a Florida Limited Liability Company,

Case No.: 9:23-cv-81246

Plaintiff,

v.

DECENT ESPRESSO INTERNATIONAL LTD.,
a Chinese business entity,

Defendant.

_____ /

**PLAINTIFF’S DISCLOSURE OF CLAIM CHARTS IDENTIFYING AND DETAILING
INFRINGEMENT CONTENTIONS**

Pursuant to this Court’s scheduling order (ECF 48) and incorporating by reference and asserting Plaintiff’s preliminary infringement contentions, Plaintiff, Duvall Espresso IP Enforcement, LLC (hereinafter, “Plaintiff”), hereby serves this disclosure of its claim charts identifying and detailing its infringement contentions with respect to the Accused Products (as identified in the operative complaint). Plaintiff reserves the right to amend or supplement these disclosures after conducting further discovery.

I. ASSERTED PATENT CLAIMS AND DETAILED INFRINGEMENT CONTENTIONS

A. U.S. Patent No. 10,772,456 (“the 456 Patent”)

As set forth and described in detail within **Exhibit A**¹ attached hereto, Plaintiff asserts claims 1-9 and 11-16 of the 456 Patent against the infringing Accused Products. See also previously served documents bates labeled as DUVALL_0001-0006 and <https://decentespresso.com/>; [https://www.youtube.com/watch?v=fB9KxmZ-tbc](https://www.youtube.com/watch?v=fB9KxmZ-tbc;); <https://www.youtube.com/watch?v=9v6Del1M0k4&t=2s>.

¹ The **Exhibit A** claim chart for the 456 Patent is also Bates Labeled as DUVALL_0008-0022.

B. U.S. Patent No. 11,576,524 (“the 524 Patent”)

As set forth and described in detail within **Exhibit B**² attached hereto, Plaintiff asserts claims 1-12 the 524 Patent against the infringing Accused Products. See also previously served documents bates labeled as DUVALL_0001, 0006-0007 and <https://decentespresso.com/>; <https://www.youtube.com/watch?v=fB9KxmZ-tbc>; <https://www.youtube.com/watch?v=9v6Del1M0k4&t=2s>.

C. U.S. Patent No. 11,957,271 (“the 271 Patent”)

As set forth and described in detail within **Exhibit C**³ attached hereto, Plaintiff asserts claims 1-10 the 271 Patent against the infringing Accused Products. See also previously served documents bates labeled as DUVALL_0001, 0006-0007 and <https://decentespresso.com/>; <https://www.youtube.com/watch?v=fB9KxmZ-tbc>; <https://www.youtube.com/watch?v=9v6Del1M0k4&t=2s>.

Dated: September 3, 2024.

Respectfully submitted,

/s/ Mark C. Johnson

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CERTIFICATE OF SERVICE

² The **Exhibit B** claim chart for the 524 Patent is also Bates Labeled as DUVALL_0023-0032.

³ The **Exhibit C** claim chart for the 271 Patent is also Bates Labeled as DUVALL_0033-0037.

I hereby certify that on September 3, 2024, a true and correct copy of the foregoing is being served this day on all parties and counsel of record via electronic email: Matthew Nelles; matt.nelles@johnsonmartinlaw.com, kerty.apelt@johnsonmartinlaw.com, Moriah.lucas@johnsonmartinlaw.com.

Dated: September 3, 2024.

Respectfully submitted,

/s/ Mark C. Johnson

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