

Exhibit 15

Pursuant to Local Patent Rule 120(a), Elvie restates herein that it asserts claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 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 S9 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 S9 device as the "Accused Device." The Momcozy S9 device contains each and every limitation of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 patent literally or under the doctrine of equivalents, and thus infringe those asserted claims as set forth herein.

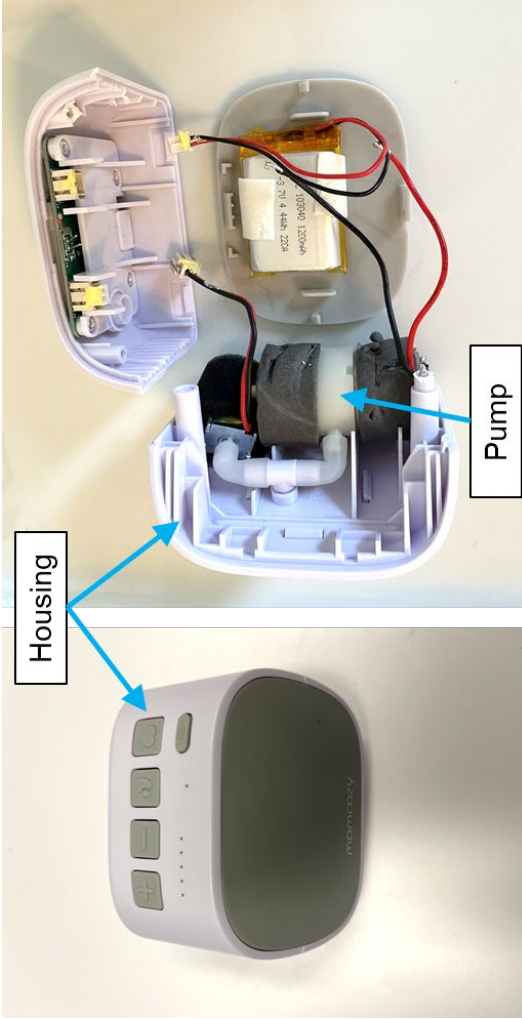
Pursuant to Local Patent Rule 120(c)–(e), Elvie submits the following claim chart identifying specifically where each limitation of each asserted claim is found within the Accused Device either directly, literally or under the doctrine of equivalents, or indirectly. Elvie reserves the right to modify 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.

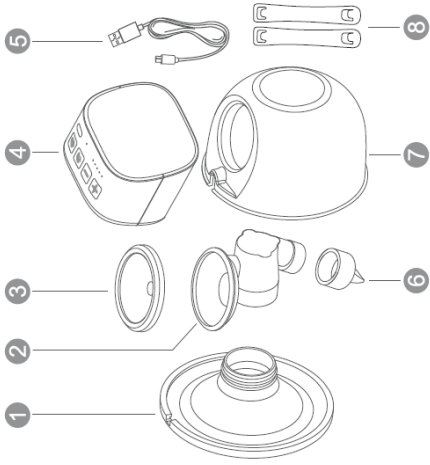
Pursuant to Local Patent Rule 120(f), Elvie states that each asserted claim of the '381 patent is entitled to a priority date that is no later than June 15, 2017.

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 S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.		
Claim Language		Momcozy S9
1.P	A breast pump device comprising:	The Momcozy S9 is a breast pump device. The Momcozy S9 is described as a “2 Mode Wearable Electric Breast Pump.” (https://momcozy.com/products/double-electric-wearable-breast-pump-s9.)
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 S9 is a breast pump device that is configured as a self-contained device, as shown below. Self-contained device 

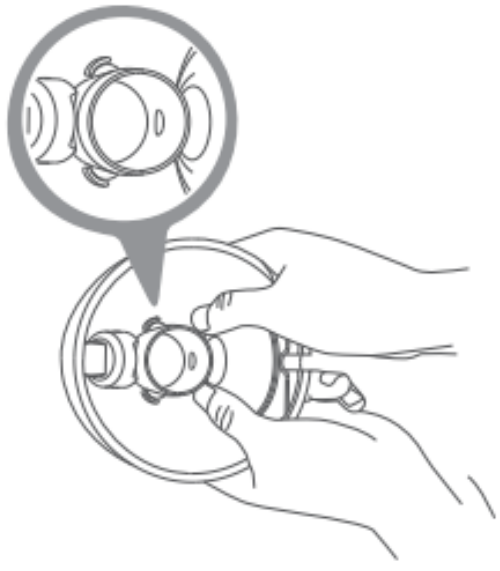
The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.		
Claim Language		Momcozy S9 The Momcozy S9 is an in-bra wearable device. In-bra wearable device (https://momcozy.com/products/double-electric-wearable-breast-pump-s9.) As shown above, the Momcozy S9 is in-bra wearable. The Momcozy website explains that the Momcozy S9 is described as “Wearable, Fit Inside Bras.” (https://momcozy.com/products/double-electric-wearable-breast-pump-s9.) The Momcozy S9 “pump is able to fit inside normal nursing bras for the whole day to get rid of ‘finding nursing room’ and ‘repeated bra-offs’ games.” (<i>Id.</i>)

The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.	
Claim Language	Momcozy S9 The Momcozy S9 includes a housing that includes a pump.  The Momcozy S9 housing includes a pump powered that generates negative air pressure. For example, the Momcozy website advertises that the “wearable hands-free pump can be worn inside a standard nursing bra, so you can pump completely hands-free anytime, anywhere.” (https://momcozy.com/products/double-electric-wearable-breast-pump-s9.) The Momcozy S9 User Manual also identifies the housing as the “pump motor,” as shown as item 4 in the figure below. (Momcozy, S9 User Manual, p. 1, https://c-media-amazon.com/images/I/C19VEy-MiPL.pdf)

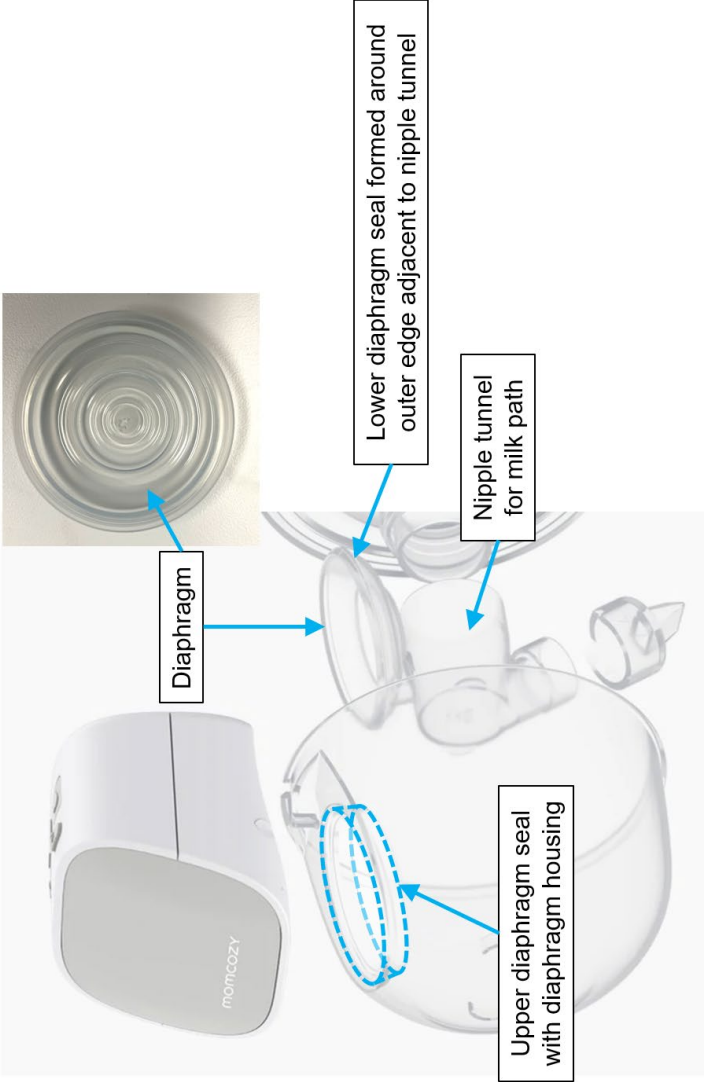
The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.	
Claim Language	Momcozy S9  Parts list 1 Silicone Flange 2 Linker 3 Silicone Diaphragm 4 Pump Motor 5 USB cable 6 Silicone Valve 7 Milk Collector 8 Bra Adjustment Buckle The Momcozy S9 pump generates negative air pressure. For example, the Momcozy website states that the S9 breast pump has “5 Adjustable <i>Suction</i> Levels.” (<i>Id.</i>, under “Feature” tab (emphasis added).) The Momcozy S9 includes a diaphragm configured to prevent milk from reaching an air pump by forming a seal around its outer edge. The Momcozy website states that the Momcozy S9 product includes a “silicone diaphragm.” (https://momcozy.com/products/double-electric-wearable-breast-pump-s9, under “What’s included” tab.)

The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.	
Claim Language	Momcozy S9 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. The Momcozy S9 User Manual indicates that the silicone diaphragm “fastens tightly to ensure a perfect seal.” (Momcozy S9 User Manual, p. 3, https://c.media-amazon.com/images/I/C19VEy-MiPL.pdf.) Then the “Milk Collector” and “Linker” are fastened together “to ensure complete sealing.” (<i>Id.</i> at p. 4.) ASSEMBLING To assemble the electric breast pump, follow the steps below. 1. Put the Silicone Diaphragm into the linker and press it with your hands to make the edges fasten tightly to ensure a perfect seal. 2. Install the valve into the bottom of the linker, make sure it is installed in the correct direction.

The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.

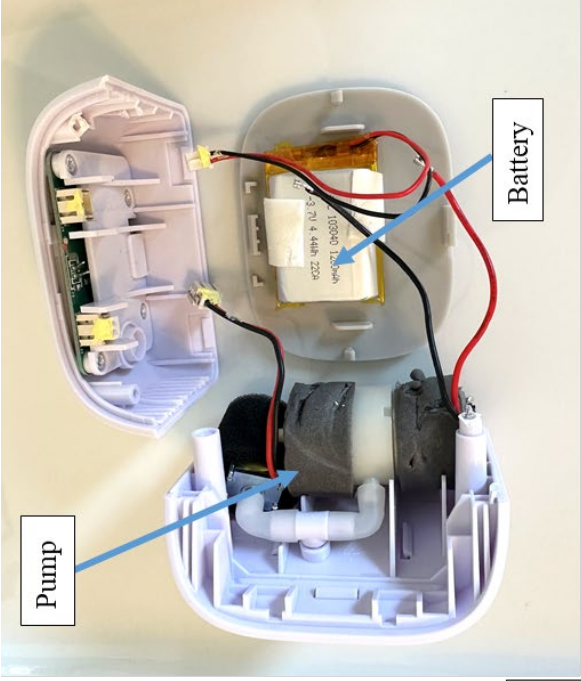
Claim Language	Momcozy S9
	3. Put the assembled linker into the Milk Collector, with the "ear" part of the Linker aligned with the internal slot of the Milk Collector and press the Linker disc part with both hands to fasten the edges firmly to ensure complete sealing.  <i>(Id. at pp. 3-4.)</i> Accordingly, the diaphragm is configured to prevent milk from reaching an air pump by forming a seal around its outer edge.

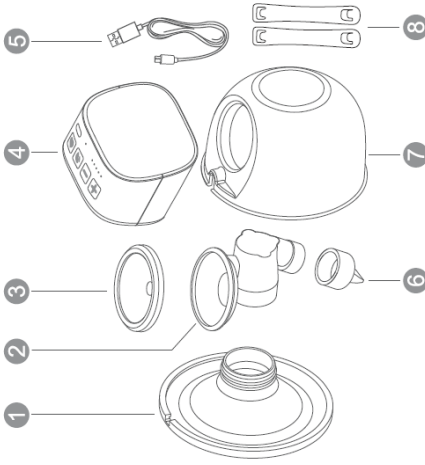
The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.

Claim Language	Momcozy S9
	 Diaphragm Upper diaphragm seal with diaphragm housing Nipple tunnel for milk path Lower diaphragm seal formed around outer edge adjacent to nipple tunnel When milk is expressed through the nipple tunnel, the diaphragm prevents milk from reaching the pump as shown below.

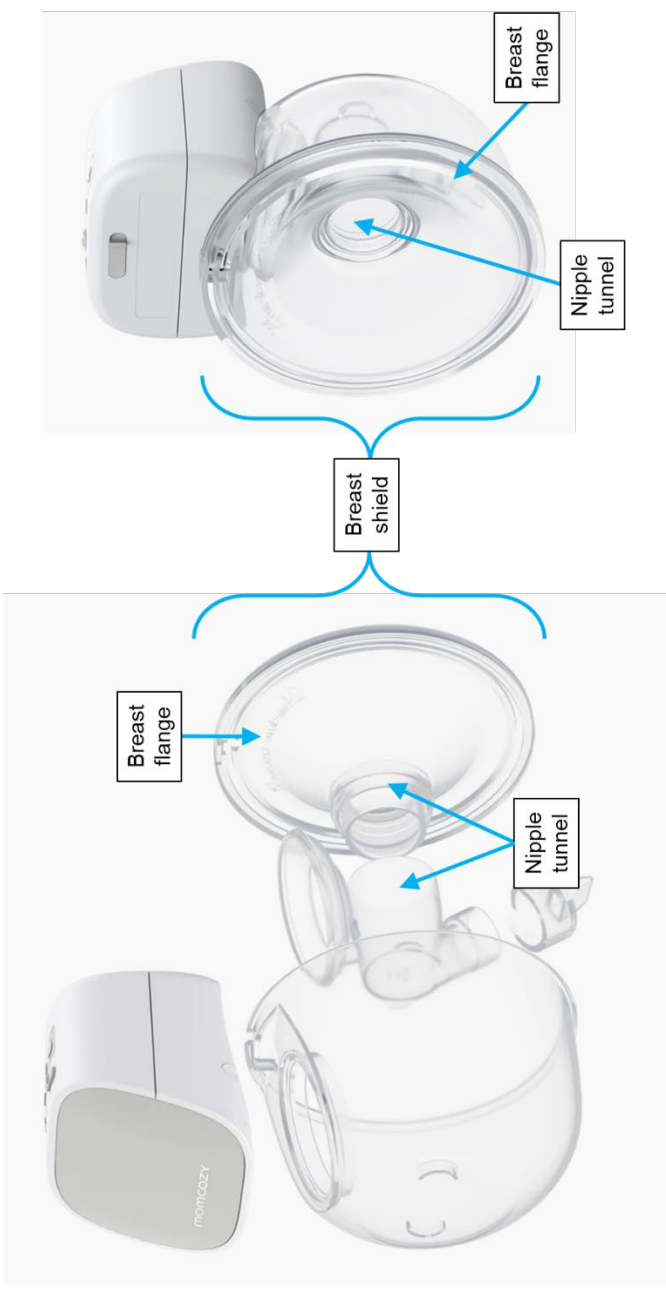
The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.

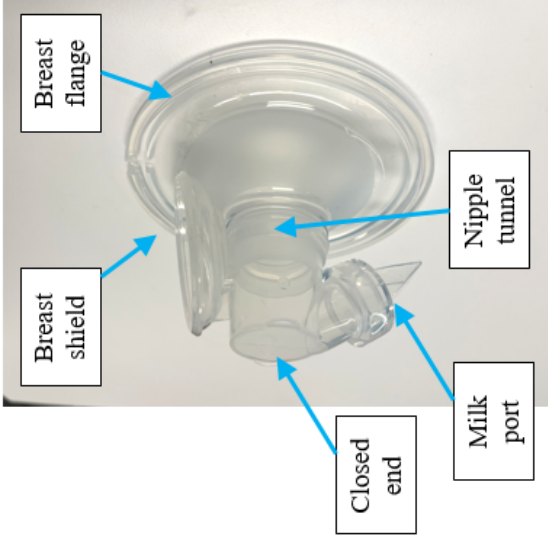
Claim Language	Momcozy S9
	The diagram shows a top-down view of the Momcozy S9 pump assembly. It consists of a grey, rounded rectangular pump housing with the brand name 'momcozy' printed on its top surface. This housing is connected to a clear plastic nipple assembly. A blue arrow points from a label box 'Pump in housing' to the grey pump housing. Another blue arrow points from a label box 'Diaphragm configured to prevent milk from reaching the pump' to the internal mechanism where the pump housing meets the nipple. A third blue arrow points from a label box 'Milk path through nipple tunnel' to the central opening of the clear plastic nipple. The entire assembly is shown within a circular clear plastic container. (https://momcozy.com/products/double-electric-wearable-breast-pump-s9.)

The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.	
Claim Language	Momcozy S9 The Momcozy S9 includes a housing that includes a battery and an air pump powered by the battery and is configured to generate negative air pressure by driving the diaphragm.
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 S9 housing includes a battery. For example, the Momcozy S9 User Manual states that “[t]his product has a built-in battery,” and that they “recommend that you use a certified 5V==1A adapter to charge the battery.” (Momcozy, S9 User Manual, p. 2, https://c.media-amazon.com/images/I/C19VEy-MiPL.pdf) The Momcozy S9 housing includes a pump powered by the battery and generates negative air pressure. For example, the Momcozy website advertises that the “wearable hands-free pump can be worn inside a standard nursing bra, so you can pump completely hands-free anytime, anywhere.”

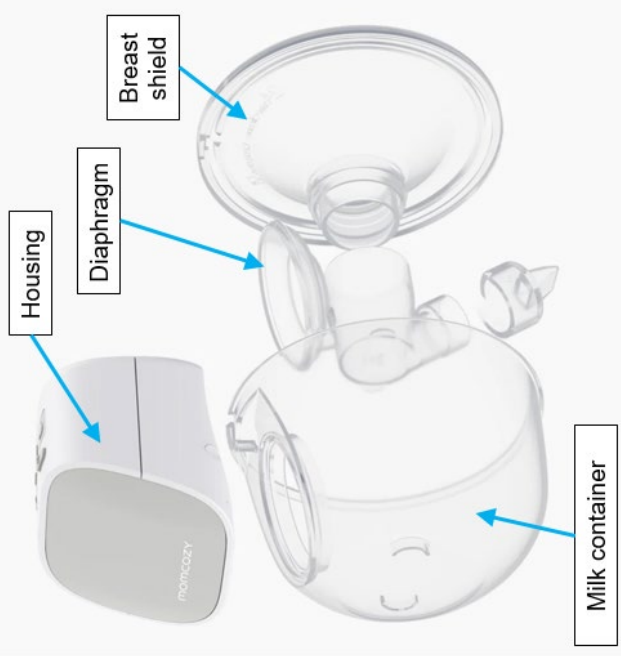
The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.	
Claim Language	Momcozy S9 (https://momcozy.com/products/double-electric-wearable-breast-pump-s9.) The Momcozy S9 User Manual also identifies the housing as the “pump motor,” as shown as item 4 in the figure below. (Momcozy, S9 User Manual, p. 1, https://c.media-amazon.com/images/I/C19VEy-MiPL.pdf)  Parts list 1 Silicone Flange 2 Linker 3 Silicone Diaphragm 4 Pump Motor 5 USB cable 6 Silicone Valve 7 Milk Collector 8 Bra Adjustment Buckle The Momcozy S9 pump generates negative air pressure. For example, the Momcozy website states that the S9 breast pump has “5 Adjustable <i>Suction</i> Levels.” (<i>Id.</i>, under “Feature” tab (emphasis added).)

The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.	
Claim Language	Momcozy S9 The Momcozy S9 pump drives the diaphragm to create negative air pressure. For example, the Momcozy S9 includes the diaphragm which deforms in response to changes in air pressure caused by the pump to create negative air pressure in the nipple tunnel. The Momcozy S9 product is advertised as having “5 Adjustable Suction Levels and 2 Modes.” (https://momcozy.com/products/double-electric-wearable-breast-pump-s9.) On information and belief, when the pump is operated in the housing, it creates a change in air pressure that deforms the diaphragm to create negative pressure in the nipple tunnel.  The diagram illustrates the internal mechanism of the Momcozy S9 pump. It shows a cross-section of the pump housing with the brand name 'momcozy' visible. A diaphragm is shown in two positions: one where it is deformed towards the housing (indicated by a red dashed line and a red arrow) and another where it is seated on a portion of the diaphragm holder (indicated by a blue dashed line and a blue arrow). The diaphragm holder is a circular component with a central opening. (https://momcozy.com/products/double-electric-wearable-breast-pump-s9.)

The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.		
Claim Language		
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	The Momcozy S9 also includes a breast shield with a breast flange and a nipple tunnel that extends from the breast flange. For example, the Momcozy S9 includes a “Silicone Shield (24 mm).” (https://momcozy.com/products/double-electric-wearable-breast-pump-s9.)  (https://momcozy.com/products/double-electric-wearable-breast-pump-s9.)

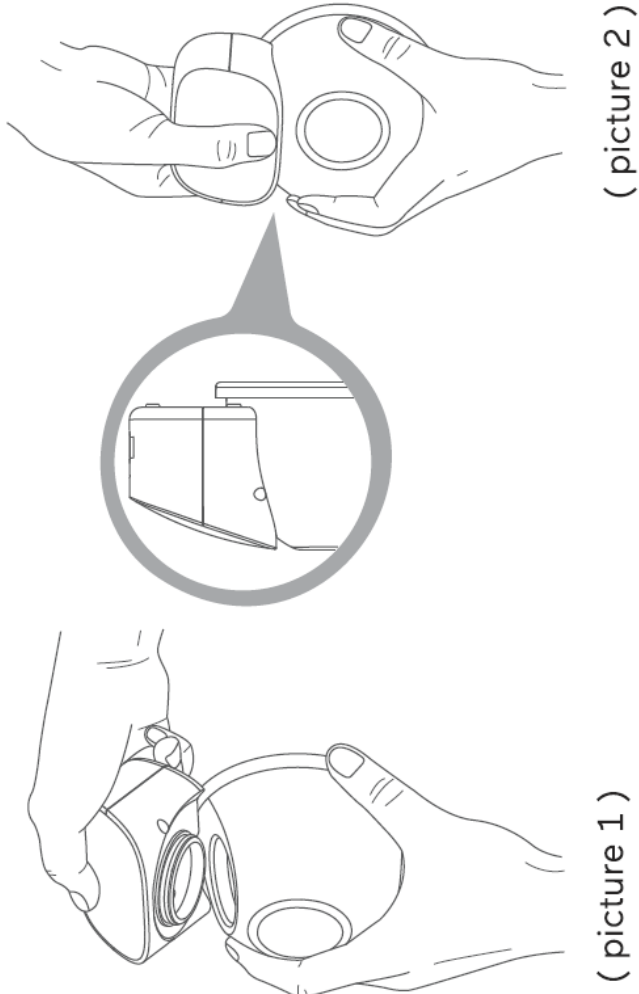
The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.		
Claim Language		Momcozy S9
	The nipple tunnel comprises of a closed end and a milk port intermediate to the breast flange and the closed end.	
		The Momcozy S9 includes a breast shield that is separate from the diaphragm.

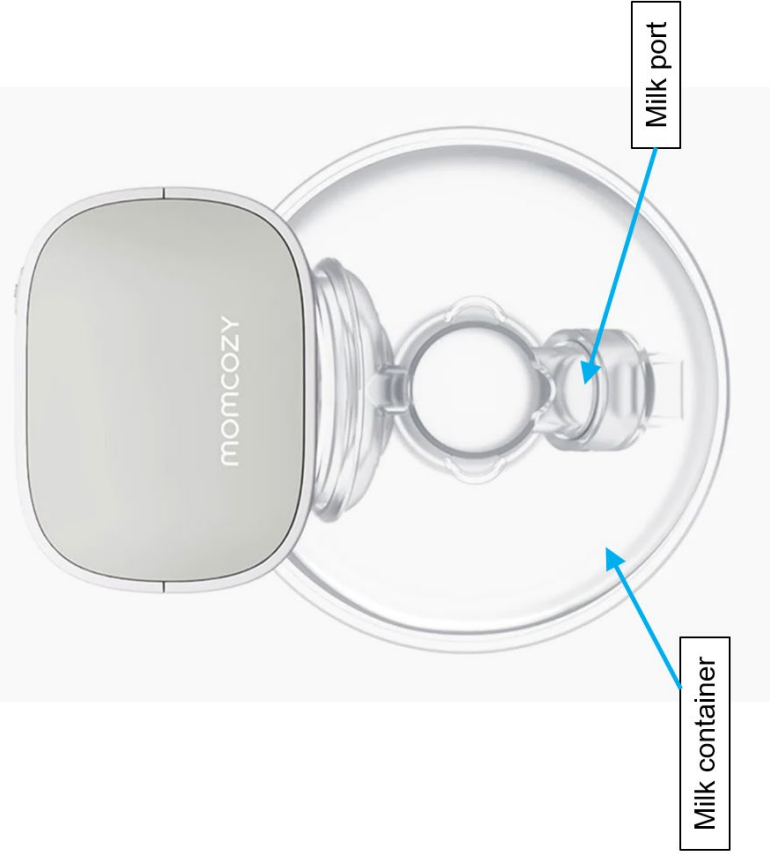
The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.

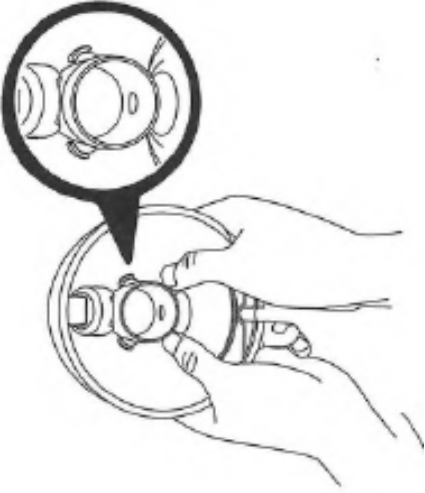
Claim Language	Momcozy S9
	

The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.	
Claim Language	Momcozy S9
1.4 a milk container that is configured to attach to the housing and receive expressed milk via the milk port.	The Momcozy S9 includes a milk container that is configured to attach to the housing and receive expressed milk via the milk port. The Momcozy S9 includes a milk container.  Milk container The Momcozy website shows that the S9 product includes a “milk collector (180ml/6oz).” (https://momcozy.com/products/double-electric-wearable-breast-pump-s9.) The Momcozy S9 milk container is configured to be attached to the housing.

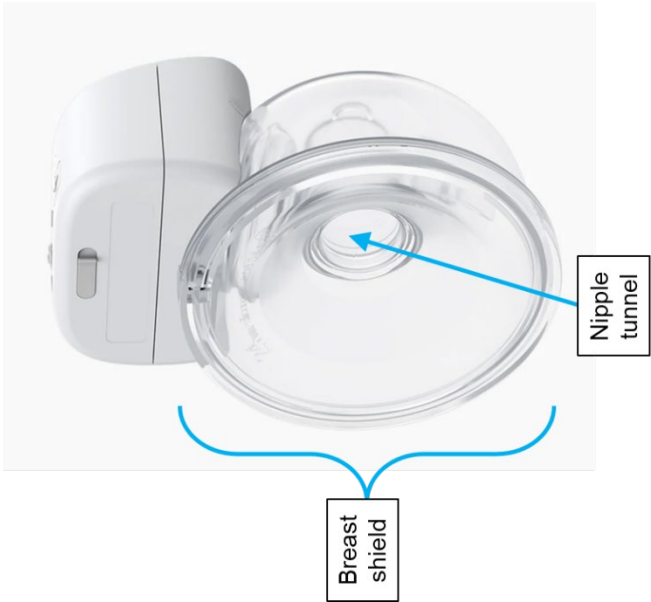
The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.		
Claim Language		Momcozy S9
		 Milk container attached to the housing  Milk container removed from the housing The S9 User Manual illustrates attachment of the housing to the milk container, as shown below. (Momcozy, S9 User Manual, p. 10, https://c.media-amazon.com/images/I/C19VEy-MiPL.pdf)

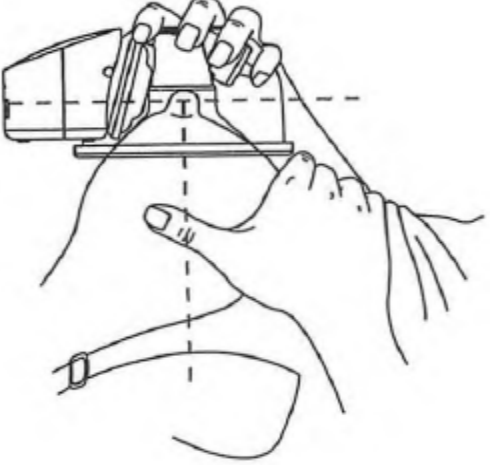
The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.		
Claim Language	Momcozy S9	
	 (picture 1) (picture 2) The Momcozy S9's milk container receives milk through the milk port that is located inside of the milk container.	

The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.		
Claim Language	Momcozy S9	
	 The Momcozy User Manual directs users to place the milk port into the milk container as shown below (Momcozy, S9 User Manual, p. 4, https://c.media-amazon.com/images/I/C19VEy-MiPL.pdf)	

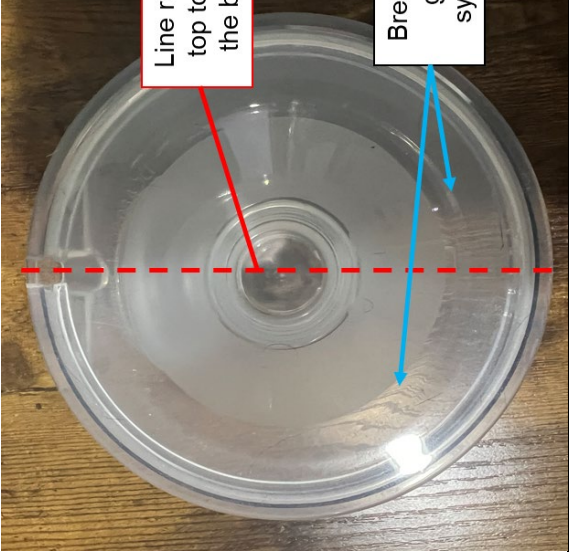
The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.		
Claim Language	Momcozy S9	
	3. Put the assembled linker into the Milk Collector, with the "ear" part of the Linker aligned with the internal slot of the Milk Collector and press the Linker disc part with both hands to fasten the edges firmly to ensure complete sealing. 	(Momcozy, S9 User Manual, p. 4, https://c.media-amazon.com/images/I/C19VEy-MiPL.pdf).

The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.

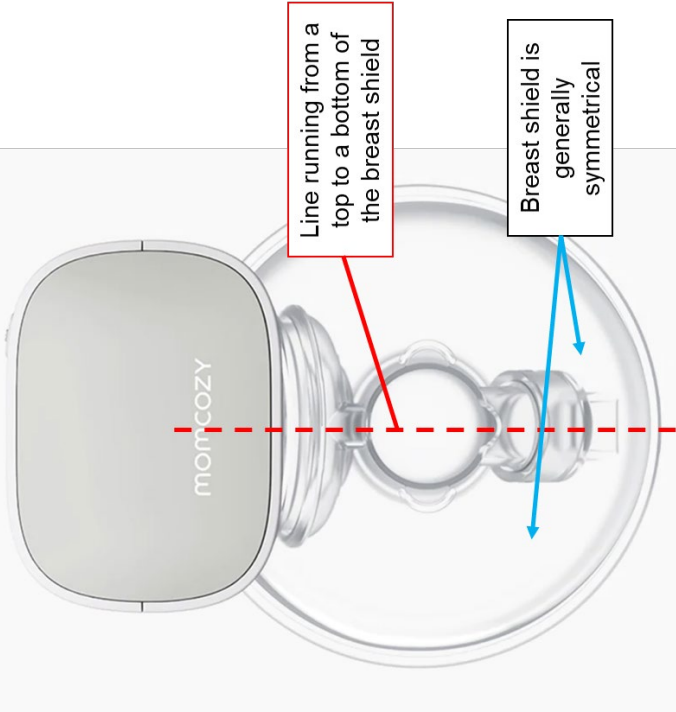
Claim Language	Momcozy S9
The breast pump device of claim 1, wherein the breast shield is configured to rotate smoothly around a nipple inserted into the nipple tunnel to provide a correct positioning of the breast shield onto a breast.  The diagram shows a top-down view of the Momcozy S9 breast pump assembly. A white, dome-shaped breast pump motor is connected to a clear, circular breast shield. The breast shield has a central opening labeled 'Nipple tunnel' with a blue arrow pointing to it. A blue bracket on the left side of the shield is labeled 'Breast shield'. See claim 1. The Momcozy S9 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. For example, the Momcozy S9 User Manual instructs to “[p]ress the silicone Flange firmly against the breast, leave no gaps and make sure your nipples are centered.” (Momcozy, S9 User Manual, p. 6, https://c.media-amazon.com/images/I/C19VEy-MiPL.pdf). 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 S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.		
Claim Language		Momcozy S9 (https://momcozy.com/products/double-electric-wearable-breast-pump-s9).
		 (Momcozy, S9 User Manual, p. 6, https://c.media-amazon.com/images/I/C19VEy-MiPL.pdf).

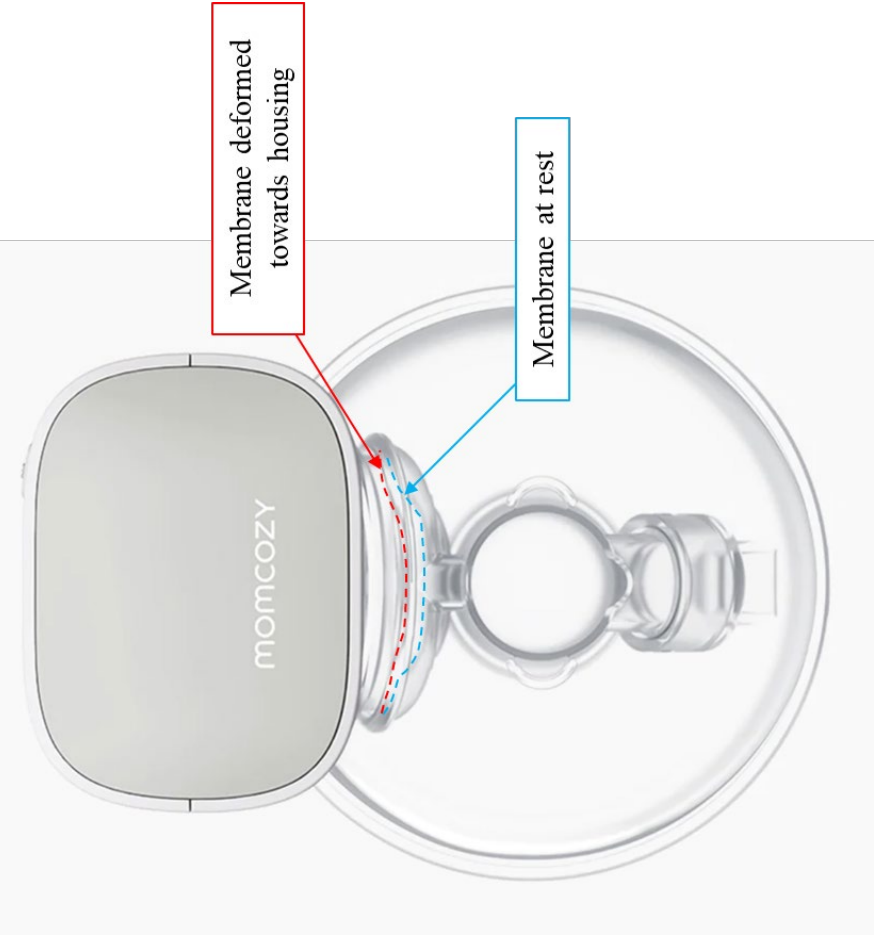
The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.	
Claim Language	Momcozy S9 See claim 1. The Momcozy S9 includes a breast shield that is generally symmetrical about a centre-line running from a top to a bottom of the breast shield when positioned upright for normal use. The Momcozy S9 has a top and bottom when positioned upright for normal use. As shown below, the breast shield of the Momcozy S9 is positioned upright for normal use and has a top and bottom. The Momcozy S9 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.

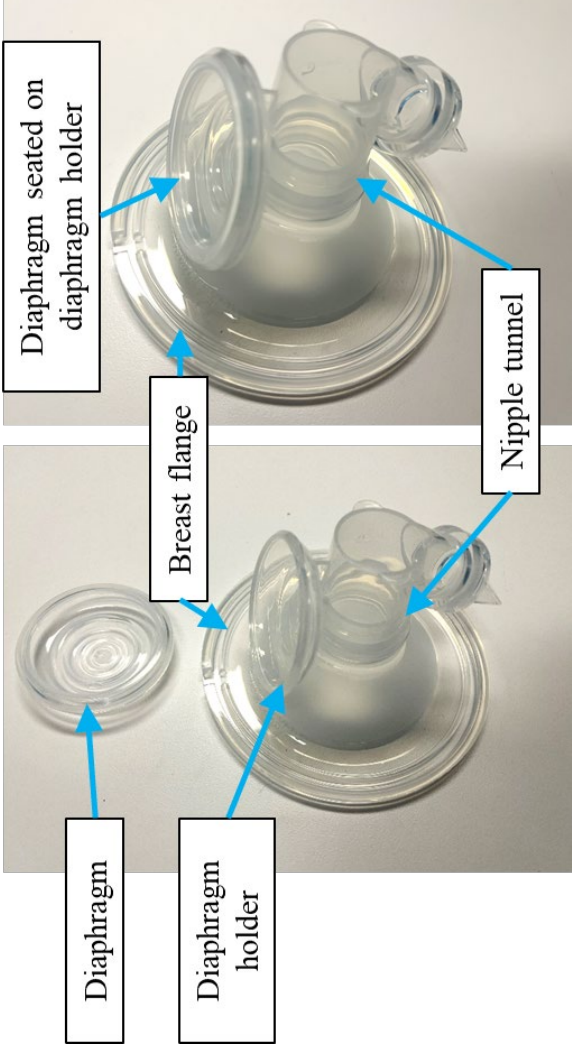
The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.		
Claim Language		Momcozy S9 For example, the Momcozy S9 below is positioned upright for normal use and is shown annotated with a centre-line running from a top to a bottom of the breast shield shown below. As shown below, the breast shield is generally symmetrical about the annotated centre-line.
		 Line running from a top to a bottom of the breast shield Breast shield is generally symmetrical

The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.

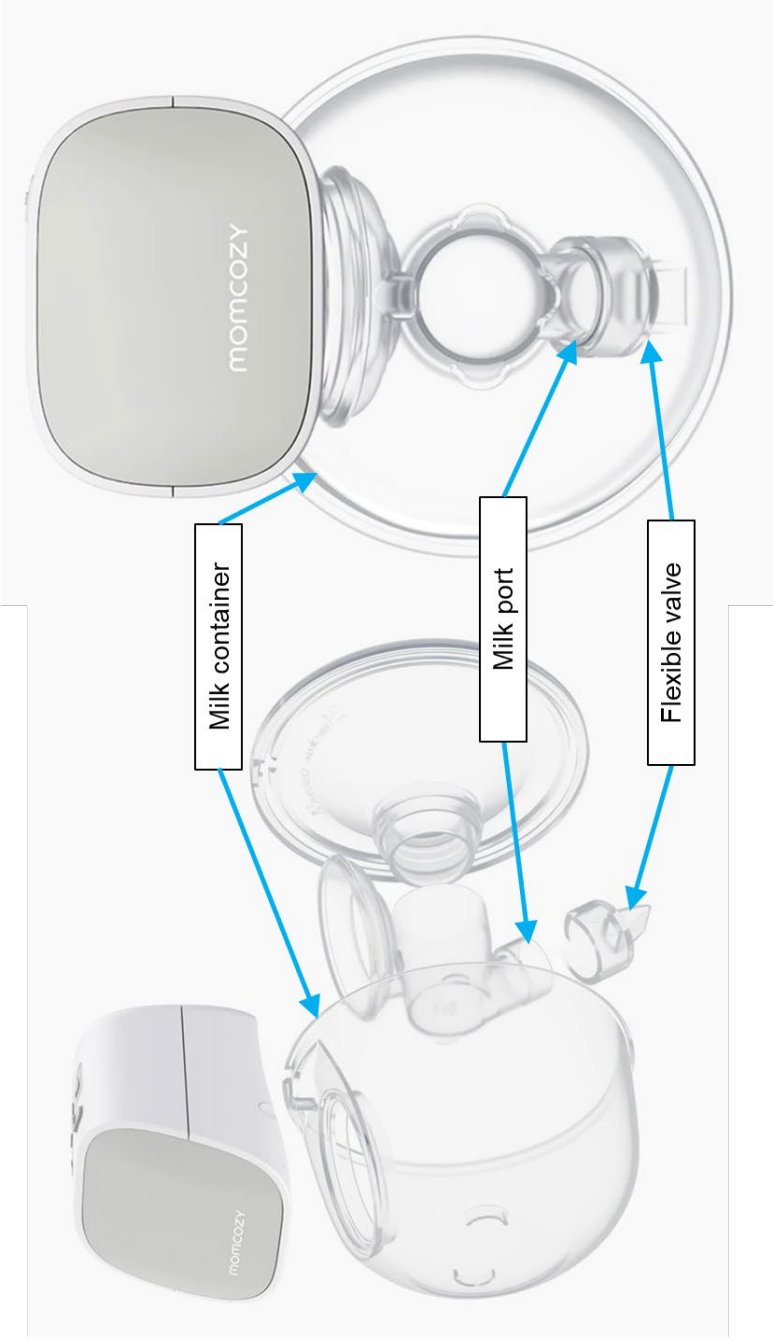
Claim Language	Momcozy S9
	 https://momcozy.com/products/9-levels-double-wearable-breast-pump-S9.)

The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.		
	Claim Language	Momcozy S9
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 S9 includes a diaphragm that is a membrane, and the diaphragm deforms in response to changes in air pressure caused by the pump to create negative air pressure in the nipple tunnel. The Momcozy S9 product is advertised as having “5 Adjustable Suction Levels.” (https://momcozy.com/products/double-electric-wearable-breast-pump-s9.) On information and belief, when the pump is operated in the housing, it creates a change in air pressure that deforms the membrane to create negative pressure in the nipple tunnel.

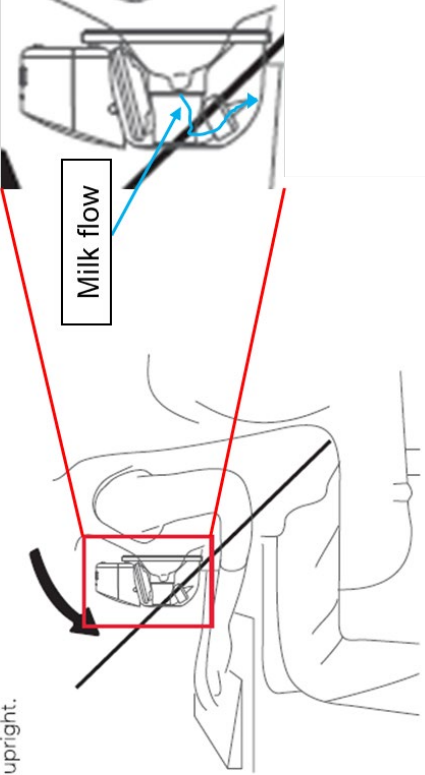
The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.		
Claim Language	Momcozy S9	
	 The diagram illustrates the Momcozy S9 breast pump assembly. It features a grey, rounded rectangular motor unit with the 'momcozy' logo, connected to a clear plastic breast shield. A red dashed line indicates the 'Membrane deformed towards housing', while a blue dashed line indicates the 'Membrane at rest'. The pump is shown within a clear plastic housing. (https://momcozy.com/products/double-electric-wearable-breast-pump-s9.)	

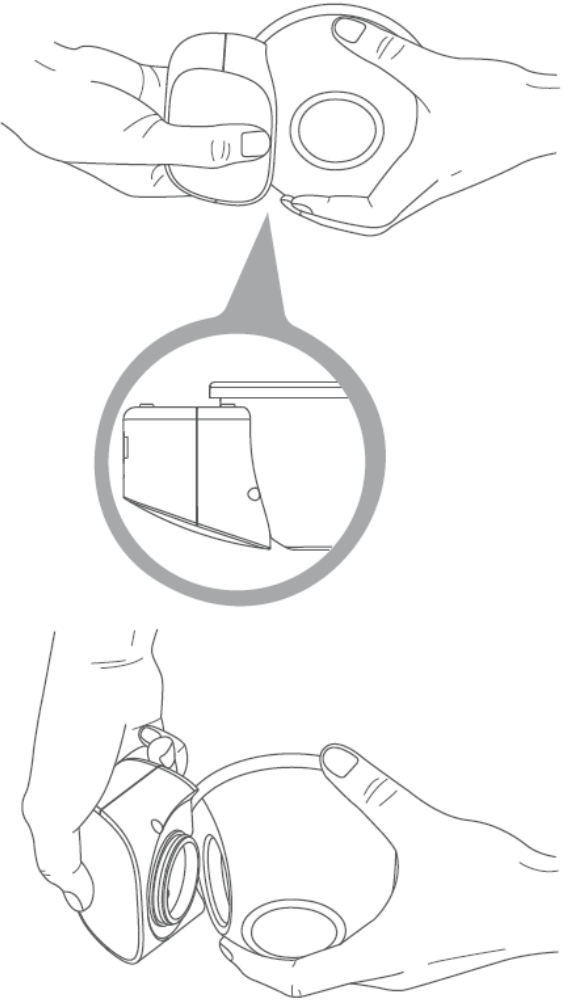
The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.		
	Claim Language	Momcozy S9
12	The breast pump device of claim 1, wherein the diaphragm is removable from a diaphragm holder that sits above the breast flange and the nipple tunnel.	See claim 1. The Momcozy S9 includes a diaphragm that is removable from a diaphragm holder that sits above the breast flange and the nipple tunnel. As shown below, the diaphragm is removable from the diaphragm holder, and in the right photo, the diaphragm holder sits above the breast flange and the nipple tunnel. 
13	The breast pump device of claim 1, wherein the milk container is substantially rigid.	See claim 1. The Momcozy S9 milk container is substantially rigid. For example, the Momcozy S9 User Manual shows that the Momcozy S9 includes a “Milk Collector.” (Momcozy S9 User Manual, https://c.media-amazon.com/images/I/C19VEy-MiPL.pdf.) The milk collector is made of a plastic material that is substantially rigid.

The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.		
Claim Language	Momcozy S9	
	OVERVIEW EN Parts list 1 Silicone Flange 2 Linker 3 Silicone Diaphragm 4 Pump Motor 5 USB cable 6 Silicone Valve 7 Milk Collector 8 Bra Adjustment Buckle	

The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.	Claim Language Momcozy S9 See claim 1. The Momcozy S9's milk container includes a flexible valve that self-seals against the milk port in the nipple tunnel and permits the expressed milk to flow into the milk container. As shown below, the milk container includes a flexible valve when assembled. 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. 	
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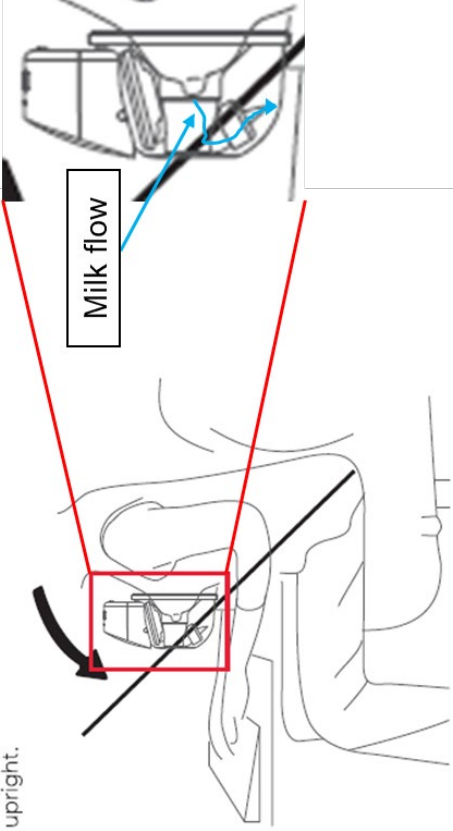
The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.	
Claim Language	Momcozy S9 (https://momcozy.com/products/double-electric-wearable-breast-pump-s9.) The Momcozy S9 User Manual shows that the valve should be installed on the bottom. (Momcozy S9 User Manual, p. 3, https://c.media-amazon.com/images/I/C19VEy-MiPL.pdf.) ASSEMBLING To assemble the electric breast pump, follow the steps below. 1. Put the Silicone Diaphragm into the linker and press it with your hands to make the edges fasten tightly to ensure a perfect seal. 2. Install the valve into the bottom of the linker, make sure it is installed in the correct direction. On information and belief, negative pressure generated by the pump housing, pulls the diaphragm towards and in sealing engagement with the diaphragm holder around an outer edge of the diaphragm. The sealing engagement between the diaphragm holder and diaphragm outer edge forms a watertight and airtight seal

The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.		
Claim Language	Momcozy S9	
	around the recess in the pump housing. The Momcozy S9's flexible valve permits milk to flow into the milk container. For example, as shown below, the Momcozy S9 User Manual instructs to "lean slightly forward" when using the pump, ensuring that expressed milk flows into the flexible valve. SUCTION AT SITTING POSITION Relax the body, sit on a comfortable chair and lean slightly forward (use the cushion for back support). Make sure to keep the breast pump and Milk Collector upright. 	

The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.		
Claim Language		Momcozy S9
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 S9 includes a milk container that 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 S9 User Manual illustrates removal and attachment of the housing to the milk container, as shown below. (Momcozy, S9 User Manual, p. 10, https://c.media-amazon.com/images/I/C19VEy-MiPL.pdf.)	

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Claim Language		Momcozy S9
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 S9's nipple tunnel includes on a lower surface the milk port through which expressed milk flows under gravity into the milk container. As shown below, the Momcozy S9 includes the milk port on a lower surface of the nipple tunnel.
		The Momcozy S9 milk port on the lower surface of the nipple tunnel allows milk to flow under gravity into the milk container. For example, as shown below, the Momcozy S9 User Manual instructs to “lean slightly forward” when using the pump, ensuring that expressed milk flows into the milk port.

The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.

Claim Language	Momcozy S9
	SUCTION AT SITTING POSITION Relax the body, sit on a comfortable chair and lean slightly forward (use the cushion for back support). Make sure to keep the breast pump and Milk Collector upright.  The diagram illustrates the correct sitting posture for using the Momcozy S9 breast pump. It shows a person sitting in a chair, leaning forward, with the pump and collector positioned against their chest. A red box highlights the pump and collector, and a red line connects it to a detailed inset showing the internal components and milk flow direction. The inset shows the pump and collector with blue arrows indicating the milk flow direction.

(Momcozy, S9 User Manual, p. 8, <https://c.media-amazon.com/images/I/C19VEy-MiPL.pdf>)

The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.

Claim Language	Momcozy S9
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 to contact a rear surface that is shaped to contact, at least in part, the breast shield.	See claim 1. The Momcozy S9 includes a housing that 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. A rear surface that is shaped to contact, at least in part, the breast shield A front surface that is configured to fit inside a bra and to contact an inner surface of the bra 5. When you have finished expressing, press the power button to switch off the breast pump and carefully remove the pump body from your breast. Housing Breast shield Housing Bra (Momcozy S9 User Manual, p. 8, https://c.media-amazon.com/images/I/C19VEy-MiPL.pdf; https://momcozy.com/products/double-electric-wearable-breast-pump-s9.)

The Momcozy S9 includes, literally or under the doctrine of equivalents, every element of claims 1, 2, 6, 11-13, 16, 17, 21, 23, 26, 27, 29 of the '381 Patent.		
Claim Language		Momcozy S9
26	The breast pump device of claim 1, wherein the air pump comprises a piezo air pump system.	See claim 1. The Momcozy S9 includes an air pump. The Momcozy S9 housing includes an air pump powered by the battery that generates negative air pressure. The Momcozy S9 User Manual identifies the housing has the “pump motor.” (Momcozy, S9 User Manual, p. 1, https://c.media-amazon.com/images/I/C19VEy-MiPL.pdf.) The Momcozy S9 includes an air pump system. To the extent the Momcozy S9 does not literally use a piezo air pump system, this claim is met under the doctrine of equivalents. The Momcozy S9’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 S9’s air pump achieves the same result as a piezo air pump by producing negative pressure. Both Momcozy S9’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 S9’s air pump is equivalent to the claimed piezo air pump system under the doctrine of equivalents.
27	The breast pump device of claim 1, wherein a total mass of the breast pump device, unfilled with milk, is less than 250 gm.	See claim 1. On information and belief, a total mass of the breast pump device, unfilled with milk, is less than 250 gm. Walmart advertises the assembled product weight of the Momcozy S9, including both pumps, as “0.95 lb,” which is equivalent to 430 grams. https://www.walmart.com/ip/Momcozy-Wearable-Breast-Pumps-S9-Portable-Breast-Pump-Hands-Free-24mm-Green/935847190. Thus, each pump has a mass of approximately 215 grams.
29	The breast pump device of claim 1, wherein the air pump is configured to generate negative air pressure with a	See claim 1. On information and belief, the Momcozy S9’s air pump is configured to generate negative air pressure with a maximum suction of approximately 240 mmHg. For example, the Momcozy S9 has 5 suction levels. (Momcozy S12 Pro User Manual, p. 8, https://c.media-amazon.com/images/I/C19VEy-MiPL.pdf.)

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Claim Language		Momcozy S9
	maximum suction of approximately 240 mmHg.	