

Ex. 582-A8 – Invalidity of the ’582 Patent in view of AfterShokz AS600

This chart is subject to all reservations, objections, and disclaimers in Mojawa’s Invalidity Contentions and any amendment, supplement, or modification thereof, which are incorporated herein by reference in their entirety.

AfterShokz AS600 qualifies as prior art to U.S. Patent No. 11,310,582 (“the 582 patent”) at least under post-AIA 35 U.S.C. §§ 102 and/or 103. AfterShokz AS600 was sold publicly on or before June 13, 2017.

AfterShokz AS600 discloses certain elements of the Asserted Claims of the ’582 patent (claims 1, 7–11, 13–15, and/or 19, as set forth in Plaintiff’s Identification of Asserted Claims served on May 29, 2025). To the extent it is found AfterShokz AS600 does not expressly disclose certain limitations in the Asserted Claims, such limitations are at least implicitly or inherently disclosed. Moreover, to the extent it is found that AfterShokz AS600 does not disclose the Asserted Claims, AfterShokz AS600 renders obvious the Asserted Claims, either alone or in combination with one or more of the prior art references identified in Mojawa’s cover pleading and other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.

In these contentions, Mojawa has relied in part on Plaintiff’s infringement contentions. In those contentions, Plaintiff appears to pursue overly broad claim constructions in an effort to assert infringement where none exists, and to accuse products that do not infringe the claims. Mojawa’s assertion that a particular limitation is disclosed by a prior art reference and/or is disclosed in a particular manner may be based in part on Plaintiff’s apparent claim interpretations. In relying on Plaintiff’s apparent claim interpretations, Mojawa does not admit that Plaintiff’s apparent claim interpretations are supportable or proper or that the claim limitations in question are definite or otherwise amenable to construction.

In addition, citations to portions of any reference in this chart are examples only. Mojawa will rely on the entirety of the reference cited in this chart to show that the Asserted Claims are invalid.

Mojawa’s prior art invalidity contentions may reflect alternative positions as to claim construction and scope and do not represent any admissions or agreement by Mojawa as to the construction meaning, scope, definiteness, function, structure, written description support for, or enablement of any claim contained herein. Mojawa’s contentions herein are not, and should in no way be seen as, any admission that Mojawa’s accused technology meets any limitations of the claims.

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
[1pre] A loudspeaker apparatus, comprising:	To the extent the preamble is limiting, AfterShokz AS600 expressly or inherently discloses “[a] loudspeaker apparatus.” For example:

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	 Microphone 2 Multifunction Button Microphone 1 Micro-USB Charging Port LED Indicator Volume up/Power Buttons Volume down AfterShokz AS600 User Guide, 3.

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600				
	Specifications				
	Part number		AS600	Wireless range	33 ft (10m)
	Speaker type		Bone conduction transducer	Battery	Rechargeable lithium ion
	Frequency response		20Hz~20KHz	Continuous play	6 hours
	Sensitivity		100 ± 3dB	Standby time	10 days
	Microphone		-40dB ± 3dB	Charge time	1.5 hours
	Bluetooth® version		Bluetooth® v4.1	Weight	1.27 oz (36g)
	Compatible profiles		A2DP, AVRCP, HSP, HFP	Warranty	2 years
	AfterShokz AS600 User Guide, 5.				

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	 All parts from disassembling of the SHOKZ AS600 bone conduction sports headphones. 52audio.com AfterShokz AS600 Disassembly, 37. To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa's other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.

All parts from disassembling of the SHOKZ AS600 bone conduction sports headphones.

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To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa's other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
[1a] an ear hook including a first plug end and a second plug end,	AfterShokz AS600 expressly or inherently discloses “an ear hook including a first plug end and a second plug end.” For example:  AfterShokz AS600 User Guide, 3.

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U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
[1b] the ear hook being surrounded by a protective sleeve, the protective sleeve being made of an elastic waterproof material;	AfterShokz AS600 expressly or inherently discloses “the ear hook being surrounded by a protective sleeve, the protective sleeve being made of an elastic waterproof material.” For example:  AfterShokz AS600 User Guide, 3.

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U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
[1c] a core housing for accommodating an earphone core, the core housing being fixed to the first plug end and elastically abutted against the protective sleeve, wherein	AfterShokz AS600 expressly or inherently discloses “a core housing for accommodating an earphone core, the core housing being fixed to the first plug end and elastically abutted against the protective sleeve.” For example:  AfterShokz AS600 User Guide, 3.

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U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	A photograph showing the complete disassembly of an AfterShokz AS600 bone conduction sports headphone. The components are laid out on a white surface. In the center is an orange rectangular box with the '52 AUDIO' logo and website. Surrounding the box are various parts: a black curved headband, two black earpieces with bone conduction transducers, a black battery pack, a small blue printed circuit board (PCB), a green PCB, a silver cylindrical component, and several black plastic mounting brackets and wires. A '52 AUDIO' watermark is visible in the bottom right corner of the image. All parts from disassembling of the SHOKZ AS600 bone conduction sports headphones. 52audio.com AfterShokz AS600 Disassembly, 37.

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	 Open the sound chamber; take out the bone conduction vibrator. 52audio.com AfterShokz AS600 Disassembly, 25. To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa's other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
[1d] the core housing including a housing panel facing human body and a housing back panel opposite to the housing panel, and	AfterShokz AS600 expressly or inherently discloses “the core housing including a housing panel facing human body and a housing back panel opposite to the housing panel.” For example:  Microphone 2 Multifunction Button Microphone 1 LED Indicator Micro-USB Charging Port Volume up/Power Buttons Volume down AfterShokz AS600 User Guide, 3.

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	A photograph showing the disassembled components of an AfterShokz AS600 bone conduction sports headphone. The parts are laid out on a white surface. In the center is an orange rectangular box with the '52 AUDIO' logo and the website 'www.52audio.com'. Surrounding the box are various components: a black headband, two black earcups, a black battery pack, a small blue circuit board, a green circuit board, a silver metal rod, and several small black and white components. A '52 AUDIO' logo is visible in the bottom right corner of the image. All parts from disassembling of the SHOKZ AS600 bone conduction sports headphones. 52audio.com AfterShokz AS600 Disassembly, 37. To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa's other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
[1e] the vibration of the earphone core drives the housing panel and the housing back panel to vibrate, the vibration of the housing panel having a first phase, the vibration of the housing back panel having a second phase,	AfterShokz AS600 expressly or inherently discloses “the vibration of the earphone core drives the housing panel and the housing back panel to vibrate, the vibration of the housing panel having a first phase, the vibration of the housing back panel having a second phase.” For example:  AfterShokz AS600 User Guide, 3.

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	 All parts from disassembling of the SHOKZ AS600 bone conduction sports headphones. 52audio.com AfterShokz AS600 Disassembly, 37. AfterShokz AS600 discloses various vibration frequency ranges between 20 Hz-20,000 Hz, which contains the claimed 2000 Hz to 3000 Hz range. Given the disclosed Hz range in AfterShokz AS600, a POSITA would expect the housing in AfterShokz AS600 to perform in the same way as the claimed housing, including “an absolute value of a difference between the first phase and the second phase is less than 60 degrees.”

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	A POSITA would understand that if the “housing panel” is vibrating, the “housing back panel” is also vibrating in phase (the absolute value of the phase difference is nearly zero). Therefore, because the “housing panel” and the “housing back panel” would each vibrate nearly in phase with one another due at least to being driven by the same source and the housing operating in the claimed frequency range of 2000-3000 Hz, a POSITA would have understood that “an absolute value of a difference between the first phase and the second phase” would be “less than 60 degrees.” To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa’s other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.
[1f] wherein when the vibration frequencies of the housing panel and the housing back panel is within a range of 2000 Hz to 3000 Hz, an absolute value of a difference between the first phase and the second phase is less than 60 degrees; and	AfterShokz AS600 expressly or inherently discloses “wherein when the vibration frequencies of the housing panel and the housing back panel is within a range of 2000 Hz to 3000 Hz, an absolute value of a difference between the first phase and the second phase is less than 60 degrees.” For example:

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[1g] a circuit housing for accommodating a control circuit or a battery, the circuit housing being fixed to the second plug end, the control circuit or the battery driving the earphone core to vibrate to generate a sound.	AfterShokz AS600 expressly or inherently discloses “a circuit housing for accommodating a control circuit or a battery, the circuit housing being fixed to the second plug end, the control circuit or the battery driving the earphone core to vibrate to generate a sound.” For example:

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U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	 Remove the top cover of the left chamber; a battery unit is provided, and is sealed by using a lot of glue.

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	 Take out the battery unit. 52audio.com AfterShokz AS600 Disassembly, 30-31.

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	 Take out the motherboard unit inside the chamber.

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	 The view of the bottom of the chamber.

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	The motherboard unit is secured to the frame inside the chamber; the wirings on the bottom of the frame are connected to the sound generation units and to the components inside the left chamber. 52audio.com AfterShokz AS600 Disassembly, 14-15. To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa's other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
[7pre] The loudspeaker apparatus of claim 1, wherein	AfterShokz AS600 expressly or inherently discloses “[t]he loudspeaker apparatus of claim 1.” <i>See</i> above at rows 1pre–1g.
[7a] the core housing is arranged with a first socket connecting with an outer end surface of the core housing,	AfterShokz AS600 expressly or inherently discloses “the core housing is arranged with a first socket connecting with an outer end surface of the core housing.” For example: 

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600																												
	AfterShokz AS600 User Guide, 3. Specifications <table><tr><td>Part number</td><td>AS600</td><td>Wireless range</td><td>33 ft (10m)</td></tr><tr><td>Speaker type</td><td>Bone conduction transducer</td><td>Battery</td><td>Rechargeable lithium ion</td></tr><tr><td>Frequency response</td><td>20Hz~20KHz</td><td>Continuous play</td><td>6 hours</td></tr><tr><td>Sensitivity</td><td>100 ± 3dB</td><td>Standby time</td><td>10 days</td></tr><tr><td>Microphone</td><td>-40dB ± 3dB</td><td>Charge time</td><td>1.5 hours</td></tr><tr><td>Bluetooth® version</td><td>Bluetooth® v4.1</td><td>Weight</td><td>1.27 oz (36g)</td></tr><tr><td>Compatible profiles</td><td>A2DP, AVRCP, HSP, HFP</td><td>Warranty</td><td>2 years</td></tr></table> AfterShokz AS600 User Guide, 5.	Part number	AS600	Wireless range	33 ft (10m)	Speaker type	Bone conduction transducer	Battery	Rechargeable lithium ion	Frequency response	20Hz~20KHz	Continuous play	6 hours	Sensitivity	100 ± 3dB	Standby time	10 days	Microphone	-40dB ± 3dB	Charge time	1.5 hours	Bluetooth® version	Bluetooth® v4.1	Weight	1.27 oz (36g)	Compatible profiles	A2DP, AVRCP, HSP, HFP	Warranty	2 years
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U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
[7b] a stopping block is arranged on an inner sidewall of the first socket, and	AfterShokz AS600 expressly or inherently discloses “a stopping block is arranged on an inner sidewall of the first socket.” For example: To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa’s other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.
[7c] the first socket is connected to the first plug end.	AfterShokz AS600 expressly or inherently discloses “the first socket is connected to the first plug end.” For example:

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	 Microphone 2 Multifunction Button Microphone 1 Micro-USB Charging Port LED Indicator Volume up/Power Buttons Volume down AfterShokz AS600 User Guide, 3.

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U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
[8pre] The loudspeaker apparatus of claim 7, wherein the first plug end includes:	AfterShokz AS600 expressly or inherently discloses “[t]he loudspeaker apparatus of claim 7.” <i>See</i> above at rows 7pre–7c.
[8a] an inserting portion being at least partially inserted into the first socket and abutting against an outer side surface of the stopping block; and	AfterShokz AS600 expressly or inherently discloses “an inserting portion being at least partially inserted into the first socket and abutting against an outer side surface of the stopping block.” For example: To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa’s other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.
[8b] two elastic hooks being arranged on a side of the inserting portion facing inside of the core housing, wherein:	AfterShokz AS600 expressly or inherently discloses “two elastic hooks being arranged on a side of the inserting portion facing inside of the core housing.” For example: To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa’s other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.
[8c] the two elastic hooks are brought together under action of external thrust and the stopping block, and after passing through the stopping block, the two elastic hooks are elastically restored to be stuck on an inner surface of the stopping block to realize the fixation of the core housing and the first plug end.	AfterShokz AS600 expressly or inherently discloses “the two elastic hooks are brought together under action of external thrust and the stopping block, and after passing through the stopping block, the two elastic hooks are elastically restored to be stuck on an inner surface of the stopping block to realize the fixation of the core housing and the first plug end.” For example: To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	Mojawa's other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.
[9pre] The loudspeaker apparatus of claim 8, wherein	AfterShokz AS600 expressly or inherently discloses "[t]he loudspeaker apparatus of claim 8." <i>See</i> above at rows 8pre–8c.
[9a] the inserting portion is partially inserted into the first socket, and	AfterShokz AS600 expressly or inherently discloses "the inserting portion is partially inserted into the first socket." For example: To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa's other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.
[9b] an exposed part of the inserting portion is arranged in a stepped manner to form an annular table surface spaced apart from the outer end surface of the core housing.	AfterShokz AS600 expressly or inherently discloses "an exposed part of the inserting portion is arranged in a stepped manner to form an annular table surface spaced apart from the outer end surface of the core housing." For example: To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa's other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.
[10pre] The loudspeaker apparatus of claim 9, wherein	AfterShokz AS600 expressly or inherently discloses "[t]he loudspeaker apparatus of claim 9." <i>See</i> above at rows 9pre–9b.
[10a] the protective sleeve further extends to a side of the annular	AfterShokz AS600 expressly or inherently discloses "the protective sleeve further extends to a side of the annular table surface facing the outer end surface of the core housing." For example:

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
table surface facing the outer end surface of the core housing, and	To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa’s other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.
[10b] when the core housing and the first plug end are fixed, the protective sleeve elastically abuts against the core housing to realize sealing.	AfterShokz AS600 expressly or inherently discloses “when the core housing and the first plug end are fixed, the protective sleeve elastically abuts against the core housing to realize sealing.” For example: To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa’s other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.
[11pre] The loudspeaker apparatus of claim 1, wherein	AfterShokz AS600 expressly or inherently discloses “[t]he loudspeaker apparatus of claim 1.” <i>See</i> above at rows 1pre–1g.
[11a] the loudspeaker apparatus further includes a fastener,	AfterShokz AS600 expressly or inherently discloses “the loudspeaker apparatus further includes a fastener.” For example: To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa’s other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.
[11b] the circuit housing is arranged with a second socket, and	AfterShokz AS600 expressly or inherently discloses “the circuit housing is arranged with a second socket.” For example:

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	 Microphone 2 Multifunction Button Microphone 1 Micro-USB Charging Port LED Indicator Volume up/Power Buttons Volume down AfterShokz AS600 User Guide, 3.

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U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
[11c] the second plug end is at least partially inserted into the second socket and connected to the second socket by the fastener.	AfterShokz AS600 expressly or inherently discloses “the second plug end is at least partially inserted into the second socket and connected to the second socket by the fastener.” For example: To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa’s other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.
[13pre] The loudspeaker apparatus of claim 1,	AfterShokz AS600 expressly or inherently discloses “[t]he loudspeaker apparatus of claim 1.” <i>See</i> above at rows 1pre–1g.
[13a] wherein the ear hook further includes a housing sheath integrally formed with the protective sleeve, the housing sheath being wrapped around periphery of the circuit housing.	AfterShokz AS600 expressly or inherently discloses “wherein the ear hook further includes a housing sheath integrally formed with the protective sleeve, the housing sheath being wrapped around periphery of the circuit housing.” For example:

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	 Microphone 2 Multifunction Button Microphone 1 Micro-USB Charging Port LED Indicator Volume up/Power Buttons Volume down AfterShokz AS600 User Guide, 3.

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U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	 Proceed to the “disassembling” procedure; firstly, disassemble the right chamber; remove the silicone cover on the top. 52audio.com AfterShokz AS600 Disassembly, 13. To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa’s other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
[14pre] The loudspeaker apparatus of claim 1,	AfterShokz AS600 expressly or inherently discloses “[t]he loudspeaker apparatus of claim 1.” <i>See</i> above at rows 1pre–1g.
[14a] wherein the vibration signal of the housing panel has a first amplitude,	AfterShokz AS600 expressly or inherently discloses “wherein the vibration signal of the housing panel has a first amplitude.” For example: 

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	All parts from disassembling of the SHOKZ AS600 bone conduction sports headphones. 52audio.com AfterShokz AS600 Disassembly, 37. AfterShokz AS600 discloses or renders obvious that the “housing panel” and “housing back panel” both vibrate. <i>See</i> [1e]. A POSITA would have understood that because the panels each vibrate, the “housing panel” necessarily has a “vibration signal” with “a first amplitude” and the “housing back panel” necessarily has a “vibration signal” with “a second amplitude.” Accordingly, AfterShokz AS600 teaches “wherein the vibration signal of the housing panel has a first amplitude, the vibration signal of the housing back panel has a second amplitude.”

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	AfterShokz AS600 further discloses or renders obvious “a ratio of the first amplitude to the second amplitude is within a range of 0.5 to 1.5.” An amplitude ratio between 0.5 to 1.5 means that the amplitudes of the vibration signals are nearly the same. The amplitudes of the vibration signals of the “housing panel” and the “housing back panel” are driven from the same source—<i>i.e.</i>, the vibration of the bone conduction speaker (“earphone core”). Therefore, in the same way a POSITA would have understood that the near synchronous vibration of the housing panels results in their nearly in phase vibrations, a POSITA would have understood the housing panels would also have nearly the same amplitudes within a range of 0.5 to 1.5 due at least to the amplitudes being driven from the same source. To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa’s other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.
[14b] the vibration signal of the housing back panel has a second amplitude, and	AfterShokz AS600 expressly or inherently discloses “the vibration signal of the housing back panel has a second amplitude.” For example:

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	 Microphone 2 Multifunction Button Microphone 1 Micro-USB Charging Port LED Indicator Volume up/Power Buttons Volume down AfterShokz AS600 User Guide, 3.

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	 All parts from disassembling of the SHOKZ AS600 bone conduction sports headphones. 52audio.com AfterShokz AS600 Disassembly, 37. AfterShokz AS600 discloses or renders obvious that the “housing panel” and “housing back panel” both vibrate. <i>See</i> [1e]. A POSITA would have understood that because the panels each vibrate, the “housing panel” necessarily has a “vibration signal” with “a first amplitude” and the “housing back panel” necessarily has a “vibration signal” with “a second amplitude.” Accordingly, AfterShokz AS600 teaches “wherein the vibration signal of the housing panel has a first amplitude, the vibration signal of the housing back panel has a second amplitude.”

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	AfterShokz AS600 further discloses or renders obvious “a ratio of the first amplitude to the second amplitude is within a range of 0.5 to 1.5.” An amplitude ratio between 0.5 to 1.5 means that the amplitudes of the vibration signals are nearly the same. The amplitudes of the vibration signals of the “housing panel” and the “housing back panel” are driven from the same source—<i>i.e.</i>, the vibration of the bone conduction speaker (“earphone core”). Therefore, in the same way a POSITA would have understood that the near synchronous vibration of the housing panels results in their nearly in phase vibrations, a POSITA would have understood the housing panels would also have nearly the same amplitudes within a range of 0.5 to 1.5 due at least to the amplitudes being driven from the same source. To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa’s other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.
[14c] a ratio of the first amplitude to the second amplitude is within a range of 0.5 to 1.5.	AfterShokz AS600 expressly or inherently discloses “a ratio of the first amplitude to the second amplitude is within a range of 0.5 to 1.5.” For example:

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	 Microphone 2 Multifunction Button Microphone 1 Micro-USB Charging Port LED Indicator Volume up/Power Buttons Volume down AfterShokz AS600 User Guide, 3.

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600																												
	Specifications <table><tr><td>Part number</td><td>AS600</td><td>Wireless range</td><td>33 ft (10m)</td></tr><tr><td>Speaker type</td><td>Bone conduction transducer</td><td>Battery</td><td>Rechargeable lithium ion</td></tr><tr><td>Frequency response</td><td>20Hz~20KHz</td><td>Continuous play</td><td>6 hours</td></tr><tr><td>Sensitivity</td><td>100 ± 3dB</td><td>Standby time</td><td>10 days</td></tr><tr><td>Microphone</td><td>-40dB ± 3dB</td><td>Charge time</td><td>1.5 hours</td></tr><tr><td>Bluetooth® version</td><td>Bluetooth® v4.1</td><td>Weight</td><td>1.27 oz (36g)</td></tr><tr><td>Compatible profiles</td><td>A2DP, AVRCP, HSP, HFP</td><td>Warranty</td><td>2 years</td></tr></table> AfterShokz AS600 User Guide, 5.	Part number	AS600	Wireless range	33 ft (10m)	Speaker type	Bone conduction transducer	Battery	Rechargeable lithium ion	Frequency response	20Hz~20KHz	Continuous play	6 hours	Sensitivity	100 ± 3dB	Standby time	10 days	Microphone	-40dB ± 3dB	Charge time	1.5 hours	Bluetooth® version	Bluetooth® v4.1	Weight	1.27 oz (36g)	Compatible profiles	A2DP, AVRCP, HSP, HFP	Warranty	2 years
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U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	All parts from disassembling of the SHOKZ AS600 bone conduction sports headphones. 52audio.com AfterShokz AS600 Disassembly, 37. AfterShokz AS600 discloses or renders obvious that the “housing panel” and “housing back panel” both vibrate. <i>See</i> [1e]. A POSITA would have understood that because the panels each vibrate, the “housing panel” necessarily has a “vibration signal” with “a first amplitude” and the “housing back panel” necessarily has a “vibration signal” with “a second amplitude.” Accordingly, AfterShokz AS600 teaches “wherein the vibration signal of the housing panel has a first amplitude, the vibration signal of the housing back panel has a second amplitude.”

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	AfterShokz AS600 further discloses or renders obvious “a ratio of the first amplitude to the second amplitude is within a range of 0.5 to 1.5.” An amplitude ratio between 0.5 to 1.5 means that the amplitudes of the vibration signals are nearly the same. The amplitudes of the vibration signals of the “housing panel” and the “housing back panel” are driven from the same source—<i>i.e.</i>, the vibration of the bone conduction speaker (“earphone core”). Therefore, in the same way a POSITA would have understood that the near synchronous vibration of the housing panels results in their nearly in phase vibrations, a POSITA would have understood the housing panels would also have nearly the same amplitudes within a range of 0.5 to 1.5 due at least to the amplitudes being driven from the same source. To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa’s other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.
[15pre] The loudspeaker apparatus of claim 1,	AfterShokz AS600 expressly or inherently discloses “[t]he loudspeaker apparatus of claim 1.” <i>See</i> above at rows 1pre–1g.
[15a] wherein the vibration of the housing panel generates a first leaked sound wave,	AfterShokz AS600 expressly or inherently discloses “wherein the vibration of the housing panel generates a first leaked sound wave.” For example:

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	 Microphone 2 Multifunction Button Microphone 1 Micro-USB Charging Port LED Indicator Volume up/Power Buttons Volume down AfterShokz AS600 User Guide, 3.

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U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	20:29-41. A POSITA would have understood that the housing panels in AfterShokz AS600 would leak sound waves in the same way due to their vibrations and similar construction to that disclosed in the '582 Patent. To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa's other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.
[15b] the vibration of the housing back panel generates a second leaked sound wave,	AfterShokz AS600 expressly or inherently discloses "the vibration of the housing back panel generates a second leaked sound wave." For example:

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	 Microphone 2 Multifunction Button Microphone 1 Micro-USB Charging Port LED Indicator Volume up/Power Buttons Volume down AfterShokz AS600 User Guide, 3.

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U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	All parts from disassembling of the SHOKZ AS600 bone conduction sports headphones. 52audio.com AfterShokz AS600 Disassembly, 37. A POSITA would have understood that because the housing panels in AfterShokz AS600 each vibrate, the vibration of AfterShokz AS600’s “housing panel” would necessarily “generate a first leaked sound wave” and the vibration of AfterShokz AS600’s “housing back panel” would necessarily “generate a second leaked sound wave.” For example, the ’582 patent teaches that “the vibration amplitudes and phases of the housing panel 710 and the housing back panel 720 keep the same or substantially the same . . . within a certain frequency range, so that a first leaked sound signal generated by the housing panel 710 and a second leaked sound signal generated by the housing back panel 720 may be superimposed on each other.” ’582 Patent,

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	20:29-41. A POSITA would have understood that the housing panels in AfterShokz AS600 would leak sound waves in the same way due to their vibrations and similar construction to that disclosed in the '582 Patent. To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa's other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.
[15c] wherein the first leaked sound wave and the second leaked sound wave are superimposed on each other, which reduces an amplitude of the first leaked sound wave.	AfterShokz AS600 expressly or inherently discloses "wherein the first leaked sound wave and the second leaked sound wave are superimposed on each other, which reduces an amplitude of the first leaked sound wave." For example:

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	 Microphone 2 Multifunction Button Microphone 1 Micro-USB Charging Port LED Indicator Volume up/Power Buttons Volume down AfterShokz AS600 User Guide, 3.

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U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	 All parts from disassembling of the SHOKZ AS600 bone conduction sports headphones. 52audio.com AfterShokz AS600 Disassembly, 37. Similarly to element [1e]-[1f] and claim 14, in the same way a POSITA would have understood that the near synchronous vibration of the housing panels results in their vibrations being nearly in phase and having nearly the same amplitude, a POSITA would have understood the leaked sound waves from the housing panels would necessarily be “superimposed on each other, which reduces an amplitude of the first leaked sound wave” due to the construction of AfterShokz AS600’s housings.

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa’s other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.
[16pre] The loudspeaker apparatus of claim 1,	AfterShokz AS600 expressly or inherently discloses “[t]he loudspeaker apparatus of claim 1.” <i>See</i> above at rows 1pre–1g.
[16a] wherein the earphone core further includes a magnetic circuit component generating a first magnetic field,	AfterShokz AS600 expressly or inherently discloses “wherein the earphone core further includes a magnetic circuit component generating a first magnetic field.” For example:

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	 Microphone 2 Multifunction Button Microphone 1 Micro-USB Charging Port LED Indicator Volume up/Power Buttons Volume down AfterShokz AS600 User Guide, 3.

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The close-up of the front of the bone conduction vibrator.



The close-up of the back of the bone conduction vibrator.

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	52audio.com AfterShokz AS600 Disassembly, 27. To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa’s other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.
[16b] the magnetic circuit component including: a first magnetic unit configured to generate a second magnetic field;	AfterShokz AS600 expressly or inherently discloses “the magnetic circuit component including: a first magnetic unit configured to generate a second magnetic field.” For example:

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	 Microphone 2 Multifunction Button Microphone 1 Micro-USB Charging Port LED Indicator Volume up/Power Buttons Volume down AfterShokz AS600 User Guide, 3.

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The close-up of the front of the bone conduction vibrator.



The close-up of the back of the bone conduction vibrator.

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	52audio.com AfterShokz AS600 Disassembly, 27. To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa’s other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.
[16c] a first magnetically conductive unit; and	AfterShokz AS600 expressly or inherently discloses “a first magnetically conductive unit.” For example:

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	 Microphone 2 Multifunction Button Microphone 1 Micro-USB Charging Port LED Indicator Volume up/Power Buttons Volume down AfterShokz AS600 User Guide, 3.

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U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
	A photograph showing the disassembled components of an AfterShokz AS600 bone conduction sports headphone. The parts are laid out on a white surface. In the center is an orange rectangular box with the '52 AUDIO' logo and website. Surrounding the box are various components: a black headband, two black earbuds with silver drivers, a black battery pack, a small blue circuit board, a green circuit board, a black plastic housing, and several wires and connectors. A '52 AUDIO' watermark is visible in the bottom right corner of the image. All parts from disassembling of the SHOKZ AS600 bone conduction sports headphones. 52audio.com AfterShokz AS600 Disassembly, 37.



The close-up of the front of the bone conduction vibrator.



The close-up of the back of the bone conduction vibrator.

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	52audio.com AfterShokz AS600 Disassembly, 27. To the extent that AfterShokz AS600 does not disclose any elements of this claim limitation, it would have been obvious to a person having ordinary skill in the art to combine, with the teachings of AfterShokz AS600, those elements as known to them or as disclosed by other prior art identified in the cover pleading, in Mojawa’s other claim charts, and/or in combination with the general knowledge of a person having ordinary skill in the art.
[16d] at least one second magnetic unit, the at least one second magnetic unit surrounding the first magnetic unit and forming a magnetic gap with the first magnetic unit,	AfterShokz AS600 expressly or inherently discloses “at least one second magnetic unit, the at least one second magnetic unit surrounding the first magnetic unit and forming a magnetic gap with the first magnetic unit.” For example:

U.S. Pat. No. 11,310,582	Exemplary citations to AfterShokz AS600
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	A photograph showing the disassembled components of a SHOKZ AS600 bone conduction sports headphone. The parts are laid out on a white surface. In the center is an orange rectangular box with the "52 AUDIO" logo and website address. To the left of the box is a small blue printed circuit board (PCB). Above the box is a black plastic headband. Below the box are two black earcups, each with a silver-colored speaker driver. To the right of the box is a long, thin black battery pack. Various wires and smaller electronic components are scattered around the main parts. All parts from disassembling of the SHOKZ AS600 bone conduction sports headphones. 52audio.com AfterShokz AS600 Disassembly, 37.



The close-up of the front of the bone conduction vibrator.



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[16e] a magnetic field strength of the first magnetic field in the magnetic gap being greater than a magnetic field strength of the second magnetic field in the magnetic gap.	AfterShokz AS600 expressly or inherently discloses “a magnetic field strength of the first magnetic field in the magnetic gap being greater than a magnetic field strength of the second magnetic field in the magnetic gap.” For example:

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[17pre] The loudspeaker apparatus of claim 16,	AfterShokz AS600 expressly or inherently discloses “[t]he loudspeaker apparatus of claim 16.” <i>See</i> above at rows 16pre–16e.
[17a] wherein the magnetic circuit component further includes: a second magnetically conductive unit; and	AfterShokz AS600 expressly or inherently discloses “wherein the magnetic circuit component further includes: a second magnetically conductive unit.” For example:

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[17b] at least one third magnetic unit being connected to the second magnetically conductive unit and the at least one second magnetic unit.	AfterShokz AS600 expressly or inherently discloses “at least one third magnetic unit being connected to the second magnetically conductive unit and the at least one second magnetic unit.” For example:

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[19pre] The loudspeaker apparatus of claim 17, wherein	AfterShokz AS600 expressly or inherently discloses “[t]he loudspeaker apparatus of claim 17.” <i>See</i> above at rows 17pre–17b.
[19a] the first magnetically conductive unit is connected to the upper surface of the first magnetic unit,	AfterShokz AS600 expressly or inherently discloses “the first magnetically conductive unit is connected to the upper surface of the first magnetic unit.” For example:

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[19b] the second magnetically conductive unit includes a bottom plate and a sidewall; and	AfterShokz AS600 expressly or inherently discloses “the second magnetically conductive unit includes a bottom plate and a sidewall.” For example:

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[19c] the first magnetic unit is connected to the bottom plate of the second magnetically conductive unit.	AfterShokz AS600 expressly or inherently discloses “the first magnetic unit is connected to the bottom plate of the second magnetically conductive unit.” For example:

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