

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ATLEISURE, LLC	)	
	)	
Plaintiff,	)	Case No. 1:24-cv-02270-TWT
	)	
v.	)	
	)	JURY TRIAL DEMANDED
TREASURE GARDEN, INC.	)	
	)	
Defendant.	)	

PLAINTIFF ATLEISURE’S LPR 6.1(a) DISCLOSURE

Plaintiff ATLeisure, LLC (“ATLeisure”) provides its LPR 6.1(a) disclosure as follows:

ATLeisure contends the qualifications of one of skill in the art at the time of the invention is likely one with an undergraduate degree in mechanical engineering, an associate’s degree in mechanical design/engineering plus product development and machining experience, or three to four years of practical experience in product development and machining.

ATLeisure identifies the term “locking means,” which appears in claims 1-4 of the ‘492 Patent, as a term governed by 35 U.S.C. §112(6).

ATLeisure otherwise contends all terms, phrases, and clauses should be given their plain and ordinary meaning (subject to the application of 35 U.S.C. §112(6)) and should not be separately construed by the Court.

Respectfully submitted, October 22, 2024.

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Attorneys for Plaintiff

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Plaintiff,	)	Case No. 1:24-cv-02270-TWT
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	)	JURY TRIAL DEMANDED
TREASURE GARDEN, INC.	)	
	)	
Defendant.	)	

I HEREBY CERTIFY that on October 22, 2024, a copy of ATLeisure's LPR 6.1 Disclosure was furnished by email transmission to:

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- “Lower and upper locations along the main pole”: Plaintiff contends no definition is required and the plain and ordinary meaning of the words themselves is proper.
- “Pivotably attached”: Plaintiff contends no definition is required and the plain and ordinary meaning of the words themselves is proper.
- “The angle of the umbrella canopy”: Plaintiff contends no definition is required and the plain and ordinary meaning of the words themselves is proper.
- “Handle associated therewith”: Plaintiff contends no definition is required and the plain and ordinary meaning of the words themselves is proper.

Respectfully submitted, November 12, 2024.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 12, 2024, a copy of ATLeisure's
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- “Lower and upper locations along the main pole”: Plaintiff contends no definition is required and the plain and ordinary meaning of the words themselves is proper.
- “Pivotably attached”: Plaintiff contends no definition is required and the plain and ordinary meaning of the words themselves is proper.
- “The angle of the umbrella canopy”: Plaintiff contends no definition is required and the plain and ordinary meaning of the words themselves is proper.
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