

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

MONAHAN PRODUCTS, LLC
d/b/a UPPABABY;

BABY GENERATION, INC
d/b/a MOCKINGBIRD;

Petitioners

v.

BABY JOGGER, LLC
Patent Owner.

U.S. Patent No. 8,955,869

Case No.: IPR2025-01105

DECLARATION OF DOUGLAS S. PRAIRIE, P.E.

TABLE OF CONTENTS

List of Exhibits.....	6
Claim Listing.....	9
I. Qualifications and Professional Experience.....	13
II. Relevant Legal Standards	19
A. Anticipation.....	19
B. Obviousness.....	19
C. Priority.....	21
III. Qualifications of A Person Having Ordinary Skill in the Art (POSITA).....	23
IV. State of the Art.....	24
A. Overview of Strollers	24
B. Basics of Stroller Structure	26
1. Basics of Stroller Structure	26
2. Folding Mechanism	30
3. Stroller Wheels.....	34
4. Rotatable and Detachable Seats	35
C. Stroller Types	40
1. Single Strollers.....	40
2. Double Strollers	42
3. Single-to-double or Double-to-triple Strollers.....	50
4. Travel Systems.....	52
V. Overview of the Baby Jogger Patent Family.....	60
A. The First Provisional	61
B. The First Non-Provisional.....	64
C. The '869 Patent	69
VI. Overview of the '869 Patent.....	71
A. '869 Patent File History	75
VII. Claim Construction.....	76
VIII. Overview of the prior art	76
A. U.S. Design Patent No. D593,459 to Liao	76
B. Spanish Patent ES 2253093 to Stopp	78

C.	U.S. Patent Pub. No. 2010/0013281 to Chen.....	79
D.	U.S. Patent Pub. No. 2006/0082104 to Wun	80
E.	U.S. Patent Pub. No. 2008/0150247 to Lake	81
IX.	GROUND 1 — LIAO.....	82
A.	Independent Claims 1 & 24.....	82
B.	Claims 2 & 25.....	96
C.	Claims 3-5 & 26-28.....	98
D.	Claim 6	101
E.	Claim 7	107
F.	Claim 8	107
G.	Claim 9	108
H.	Claim 10	115
I.	Claim 11	116
J.	Claim 12	117
K.	Claim 13	118
L.	Claim 14	120
M.	Claim 15	122
N.	Claim 16	123
O.	Claim 17	124
P.	Claims 18-22	125
Q.	Claim 23	128
R.	Claim 29	130
S.	Claim 30	131
X.	<u>GROUND 2 – LIAO IN VIEW OF CHEN</u>	133
A.	Independent Claims 1 & 24.....	133
B.	Claims 2 & 25.....	135
C.	Claims 3-5 & 26-28.....	136
D.	Independent Claim 9	137
E.	Claim 10	139
F.	Claim 11	140
G.	Claim 12	140
H.	Claim 13	141
I.	Claim 14	141
J.	Claim 15	141
K.	Claim 16	142
L.	Claim 17	144
M.	Claims 18-23	145
N.	Claim 29	147

O.	Claim 30	148
XI.	<u>GROUND 3 — STOPP</u>	150
A.	Independent Claims 1 & 24.....	150
B.	Claims 2 & 25.....	159
C.	Claims 3-5, 26-28	160
D.	Independent Claim 6	163
E.	Claim 7	168
F.	Claim 8	169
G.	Independent Claim 9	170
H.	Claim 10	175
I.	Claim 11	176
J.	Claim 12	177
K.	Claim 13	178
L.	Claim 14	179
M.	Claim 15	180
N.	Claim 16	181
O.	Claim 17	182
P.	Claims 18-23	183
Q.	Claim 29	185
R.	Claim 30	186
XII.	<u>GROUND 4 – STOPP IN VIEW OF CHEN</u>	188
A.	Claims 1 & 24.....	188
B.	Claims 2 & 25.....	190
C.	Claims 3-5 & 26-28	191
D.	Claim 9	192
E.	Claim 10	194
F.	Claim 11	195
G.	Claim 12	196
H.	Claim 13	196
I.	Claim 14	197
J.	Claim 15	197
K.	Claim 16	198
L.	Claim 17	199
M.	Claims 18-23	200
N.	Claim 29	201
O.	Claim 30	202

XIII. GROUND 5 – STOPP IN VIEW OF CHEN IN FURTHER VIEW OF WUN AND LAKE	202
XIV. Conclusion	207

List of Exhibits

Exhibit No.	Description	Identifier
1001	Declaration of Douglass Prairie	Prairie Decl.
1002	U.S. Provisional Patent Application No. 61/119,920	First Provisional
1003	U.S. Publication No. 2010/0140902	First Non-Provisional
1004	U.S. Pat. No. 8,955,869	The ‘869 Patent
1005	U.S. Pat. No. 9,403,550	The ‘550 Patent
1006	U.S. Provisional Patent Application No. 62/311,224	Second Provisional
1007	U.S. Pat. No. 9,944,305	‘305 CIP
1008	U.S. Pat. No. 10,730,543	The ‘543 Patent
1009	U.S. Patent No. 11,192,568	The ‘568 Patent
1010	U.S. Patent No. 11,731,682	The ‘682 Patent
1011	U.S. Pat. No. 11,577,771	The ‘771 Patent
1012	U.S. Pat. No. 11,505,231	The ‘231 Patent
1013	U.S. Pat. No. 11,878,729	The ‘729 Patent
1014	Non-certified File History of U.S. Patent Pub. No. 2010/0140902	
1015	Non-certified File History of U.S. Patent No. 8,955,869	
1016	Non-certified File History of U.S. Patent No. 9,403,550	
1017	Non-certified File History of U.S. Patent No. 9,944,305	
1018	Non-certified File History of U.S. Patent 10,730,543	
1019	Certified File History of U.S. Patent No. 11,192,568	
1020	Certified File History of U.S. Patent No. 11,731,682	
1021	Certified File History of U.S. Patent No. 11,577,771	
1022	Non-certified File History of U.S. Patent No.	

Exhibit No.	Description	Identifier
	11,505,231	
1023	Non-certified File History of U.S. Patent No. 11,878,729	
1024	Certified File History of U.S. Patent Publication No. 2023/0382447	
1025	Sewell, Samuel J. “The History of Children’s and Invalids’ Carriages.” <i>Journal of the Royal Society of Arts</i> , vol. 71, no. 3694, 1923, pp. 716–728	
1026	U.S. Patent No. 405,600	Richardson
1027	U.S. Patent No. 510,355	Mann
1028	<i>Intentionally left blank</i>	
1029	U.S. Patent No. 4,191,397	Kassai
1030	U.S. Patent No. 6,513,827	Barenbrug
1031	Declaration of Hollie Schultz	
1032	Declaration of Greg Allen	
1033	U.S. Patent No. 7,641,216	Cone
1034	U.S. Patent No. 4,398,748	Duvignacq
1035	U.S. Patent Pub. No. 2008/0238042	Zhong
1036	<i>Intentionally left blank</i>	
1037	U.S. Patent No. 6,086,087	Yang
1038	Kolcraft Contours Options Tandem Stroller Instruction Sheet, EXA to Affidavit of Christopher Butler	
1039	French Patent 2,615,155 and Non-certified English Translation	Alain
1040	U.S. Patent No. 6,209,892	Schaaf
1041	EP 0980810	Gotting
1042	U.S. Design Patent 514,036	Fox
1043	Evenflo Take Me Too Manual – Double Stroller/Double Travel System (Oct. 2004)	
1044	U.S. Patent No. 6,045,145	Lan
1045	U.S. Patent No. 5,794,951	Corley
1046	Comparison of First Non-Provisional Specification and 305 ‘305 CIP specification	
1047	U.S. Patent No. 8,882,134	Rolicki

Exhibit No.	Description	Identifier
1048	U.S. Design Patent No. D593,459	Liao
1049	U.S. Patent Pub. No. 2006/0071451	Cheng
1050	U.S. Patent No. 6,923,467	Hsia '467
1051	Taiwanese Design Patent No. D129880 and Certified English Translation	UPD
1052	U.S. App. No. 29/324,044 Non-certified File History	
1053	CN2778636Y with Certified English Translation	Feng
1054	U.S. Patent Pub. No. 2003/0075902	Hsia '902
1055	U.S. Patent Pub. No. 2003/0075902	
1057	<i>Intentionally Left Blank</i>	
1058	<i>Intentionally Left Blank</i>	
1059	<i>Intentionally Left Blank</i>	
1060	U.S. Patent Pub. 2006/0082104	Wun
1061	U.S. Patent Pub. 2008/0150247	Lake
1062	E.S. Patent No. 2,253,093	
1063	Translation of E.S. Patent No. 2,253,093	Stopp
1064	Certification of Accuracy of Translation of E.S. Patent No. 2,254,093	
1065	U.S. Patent Pub. No. 2010/0013281	Chen
1066	Non-Certified File History of U.S. Design Patent No. D593,459	Liao File History
1067	U.S. Patent No. 6,585,284	Sweeney
1068	U.S. Patent No. 12,275,449 File History	
1069	U.S. Patent No. 7,377,537	Li
1070	Baby Jogger Claim Construction Brief	
1071	Claim Listing for '869 Patent	
1072	Power of Attorney	

Claim Listing

1(Pre)	A seat attachment for a stroller, comprising:
1(a)	a separate left attachment portion, wherein the left attachment portion comprises:
1(b)	a connector portion capable of removably connecting to a stroller frame adjacent a left front wheel of the stroller and a left seat support element removably connecting a seat in either a forward or backward position; and
1(c)	a separate right attachment portion, wherein the right attachment portion comprises:
1(d)	a connector portion capable of removably connecting to a stroller frame adjacent a right front wheel of the stroller and a right seat support element removably connecting the seat in either a forward or backward position between the left and right support elements.
2	The seat attachment for a stroller of claim 1, wherein the seat is a baby seat, a car seat, a stroller seat, a bassinet, or a pram.
3	The seat attachment for a stroller of claim 1, wherein each attachment portion has a first end and a second end.
4	The seat attachment for a stroller of claim 3, wherein the first end is capable of connecting to the stroller frame.
5	The seat attachment for a stroller of claim 4, wherein the second end is connected to the seat.
6(Pre)	A stroller, comprising:
6(a)	a frame;
6(b)	two front wheels;
6(c)	at least one rear wheel;
6(d)	a stroller seat; and
6(e)	two attachment frame members connected to the frame adjacent to the front wheels,
6(f)	wherein the attachment frame members are capable of removably receiving and supporting separate right and left seat attachment portions,
6(g)	wherein each of the seat attachment portions comprises a connector portion for removably connecting to the attachment frame member and a seat support element for removably connecting a stroller seat between the seat attachment portions.

7	The stroller of claim 6, wherein the attachment frame members comprise a slot for removably receiving the connector portion of the seat attachment portion.
8	The stroller of claim 6, wherein the frame of the stroller is capable of supporting a second seat and the second seat is selected from a stroller seat, an infant carrier, a bassinet, a pram, or a car seat.
9(Pre)	A stroller, comprising:
9(a)	a first stroller seat reversibly and removably connected to a stroller frame having a left front wheel and a right front wheel;
9(b)	two attachment frame members attached to the stroller frame,
9(c)	wherein one attachment frame member is connected adjacent to the left front wheel and the other attachment frame member is connected adjacent to the right front wheel, and
9(d)	separate left and right seat attachment portions for converting the stroller into a double stroller, the seat attachment comprising:
9(e)	a connector portion capable of removably connecting to one of the attachment frame members above a respective front wheel of the stroller, and
9(f)	a seat support element removably connecting a second stroller seat in either a forward or backward position.
10	The stroller of claim 9, wherein the first stroller seat is releasably connected in a backward position.
11	The stroller of claim 10, wherein the second stroller seat is one of a stroller seat, a car seat, or a bassinet.
12	The stroller of claim 9, wherein the second seat is a bassinet or a car seat.
13	The stroller of claim 9, wherein the frame further comprises two folding mechanisms.
14	The stroller of claim 10, wherein the first seat comprises a releasable connection including a button or a locking tab.
15	The stroller of claim 12, comprising a pair of back wheels.
16	The stroller of claim 15, wherein the front wheels pivot and the back wheels are fixed.
17	The stroller of claim 9, wherein one of the two attachment frame members is a right side attachment frame member and the other attachment frame member is a left attachment frame member.
18	The stroller of claim 9, wherein each of the connector portions has a cylindrical shape.

19	The stroller of claim 18, wherein the attachment frame member has a cylindrical slot.
20	The stroller of claim 19, wherein the connector portion of the seat attachment portion is inserted in the cylindrical slot.
21	The stroller of claim 9, wherein the connector portion is tubular construction.
22	The stroller of claim 9, wherein the connector portion has a circular cross-sectional shape.
23	The stroller of claim 9, wherein the connector portion has a complementary and cooperating shape that allows the connector portion to be secured to the attachment portion.
24(pre)	A seat attachment for a stroller, comprising:
24(a)	a left seat attachment portion, wherein the left seat attachment portion comprises:
24(b)	a connector portion capable of removably connecting to a stroller frame adjacent a left front wheel and a left seat support element removably connecting a seat in either a forward or backward position; and
24(c)	a right seat attachment portion, wherein the right seat attachment portion comprises:
24(d)	a connector portion capable of removably connecting to the stroller frame adjacent a right front wheel and a right seat support element removably connecting the seat in either a forward or backward position between the left and right seat support elements.
25	The seat attachment for a stroller of claim 24, wherein the seat is a baby seat, a car seat, a stroller seat, a bassinet, a baby carrier, or a pram.
26	The seat attachment for a stroller of claim 24, wherein each of the left and right seat attachment portions has a first end and a second end.
27	The seat attachment for a stroller of claim 26, wherein the first end is capable of directly connecting to a stroller frame.
28	The seat attachment for a stroller of claim 27, wherein the second end is connected to the seat.
29	The seat attachment for a stroller of claim 24, further comprising a stroller seat connected to the left seat support element and the right seat support element.
30	The seat attachment for a stroller of claim 24, wherein both connector portions reversibly connects to the stroller by at least one of buttons,

	snaps, friction fittings, interference fits, threaded connections, locking tabs, or keyed connections.
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I, Douglas S. Prairie, hereby declare as follows:

1. I am making this declaration at the request of the Petitioners in the matter of *Inter Partes* Review of U.S. Patent No. 8,955,869 (“the ‘869 Patent”) to Zehfuss.

2. I am being compensated at my normal consulting rate of \$150/hour for my work, but my opinions are based on my own views of the patented technology and the prior art. My compensation is not dependent on the outcome of this proceeding and in no way affects the substance of my statements in this Declaration.

3. In preparation of this declaration, I have studied the exhibits as listed in the Exhibit List shown above in my report.

4. In forming the opinions expressed below, I have considered:

- a. The documents listed above, as well as additional patents and documents referenced herein;
- b. The relevant legal standards, including the standard for obviousness provided in *KSR International Co. v. Teleflex, Inc.*, 550 U.S. 398 (2007), and any additional documents cited in the body of this declaration; and
- c. My knowledge and experience based upon my work and study in this area as described below.

I. Qualifications and Professional Experience

5. I am currently a lecturer at South Dakota State University and a registered Professional Engineer in the State of Idaho. I hold an M.S. in Mechanical Engineering from Boise State University, which I received in 2004. I also hold a B.S. in Agricultural Engineering (with a focus on power and machinery) from South Dakota State University, which I received in 1997.

6. I have worked in the engineering industry for over twenty-five years in various roles, including as a test engineer, product developer, engineering department manager, sales manager, mechanical research manager for an innovation group, mechanical and industrial design engineer, and consultant. My professional work experience has included the design, development, and testing of strollers like those being referenced in this case. I am also the proud father of triplets, so I am well versed in child mobility gear. In my present position as a lecturer at South Dakota State University, I lecture and lead the development of engineering and technical-based coursework. Courses I am responsible for involve the design, operation and ownership of various types of mechanical equipment.

7. From May 1996 until September 1996 (while I was completing my B.S.), I worked for Ag-Chem Equipment Co., where I performed product testing on various mechanical systems. (I understand that after my work there, Ag-Chem Equipment Co. was acquired by AGCO Corporation in 2001.)

8. From October 1996 until July 2000, I worked for Case Corporation, a

large manufacturer of construction and agricultural equipment, as a New Product Development Engineer. In that role, I was involved in the conception, design, development, and production of mechanical equipment.

9. From December 2000 until February 2003 and again from September 2005 until December 2007, I worked for Multiquip, a manufacturer and supplier of products for construction, industrial, telecom, government, and other industries, as an Engineering Department Manager. In that role, I managed a team of 15 engineers, designers, drafters, and technicians in support of over 200 different products. I also managed a \$1.3 million budget for product development and engineering product support. My responsibilities also included designing equipment to comply with applicable safety and homologation standards.

10. From February 2003 until September 2005, I worked for Bratney Companies as a Construction/Mechanical Project Engineer of Industrial Processes. My role involved the development and management of construction projects.

11. From December of 2007 to March of 2010, I performed full time contract engineering work through my own company, Prairie West LLC, which was based in Boise, ID. One of the long-term contracts I performed during that period was for BOB Gear (a high-end jogging stroller manufacturer and marketer) as a designer, developer, and test engineer on projects involving single and double jogging strollers. My engineering education and extensive experience involving

product design, development, testing, and safety standard compliance for mechanical products made me well-suited for the role. Also, as a parent of triplets who were toddlers at this point in my life, I was able to provide BOB Gear with not only engineering expertise but also direct applied knowledge of strollers from a parent's perspective. I worked on a variety of projects for BOB Gear, including an updated design of their single and double jogging strollers. My early work at BOB Gear involved taking a new stroller design concept produced by an external industrial designer and analyzing the concept's ability to meet functional goals, manufacturability cost goals, and be compliant with child safety guidelines and homologation standards. This effort required extensive knowledge of the stroller market landscape, manufacturing methods and materials utilized within the stroller industry, and global child safety standards for strollers and child seats. This project produced some innovative concepts that I worked on integrating into some of BOB Gear's existing line of strollers. Some of this work included updating stroller suspension systems, improving stroller folding systems, and designing a new removable adapter system that could be used for cup holder trays and infant car seat adapters. My work at BOB Gear involved developing concepts in SolidWorks CAD software, producing physical prototypes, and then testing these concepts with a variety of popular infant car seat brands attached to the stroller. Tests I performed were to check for general performance, ease of installation and removal of the

adapters and car seats, compliance with domestic and international child safety standards, and ease of adapting to a variety of popular infant car seat brands. One test I performed multiple times involved placing the stroller on a flat surface that could be pivoted to increase the pitch and yaw angle until such point the stroller would start to tip over. The purpose of this test was to check for the center of gravity (CG) location and make sure the stroller would comply with global safety standards. I performed tests on the base stroller along with various brands of car seats and various types of stroller accessories. This test often involved placing a sandbag style weight in the infant car seat or stroller seat to simulate the weight of a child. These tests produced valuable results that allowed BOB Gear's engineering team to better understand how their design choices affected the stability of the stroller and its attachments. BOB Gear still produces the strollers that I helped design. I understand that BOB Gear is now owned by Britax Child Safety, Inc.

12. From March 2010 until March 2015, I worked for Raven Industries (now part of CNHi), first as a Project Manager and then as the North American Sales Manager. In those roles, I oversaw development and launch of multiple mechanical products.

13. From June 2015 until June 2016, I worked for POET Research as a Mechanical Research Manager in the research and innovation group. POET Research develops and produces clean and renewable biofuels.

14. From August 2016 until the present, I have taught as a Lecturer at South Dakota State University in the Agriculture and Biosystems Engineering Department. I have taught and led the development of courses for undergraduate students that go on to receive Bachelor of Science degrees in Mechanical Engineering (ME), Agriculture Systems Technology (AST), Precision Agriculture (PRAG), and Agriculture and Biosystems Engineering (ABE). Examples of specific courses I lead and/or instruct include ABE 234 Digital Tools for Agriculture Engineers, ABE 314 Agriculture Power and Machinery; ABE 411/422 Capstone Design; ABE 350 Hydraulic Systems; ABE 464 Monitoring and Controls; AST 412 Fluid Power Technology; PRAG 304 Electrical Diagnostics of Farm Machinery; and AST 313 Farm Machinery Management.

15. I am a named inventor on multiple U.S. patents and applications, including: U.S. Patent Nos. 5,915,312, 6,047,652, 6,116,172, 6,386,127, 6,640,732, 6,644,223, 6,454,019, and U.S. Patent Application No. 13/842,326.

16. I am a member of multiple professional organizations, including the American Society of Mechanical Engineers (ASME) and American Society of Agricultural and Biological Engineers (ASABE).

17. A copy of my curriculum vitae is attached as Appendix A, which contains further details regarding my experience, education, and other qualifications to render an expert opinion in connection with this proceeding.

II. Relevant Legal Standards

18. I have been asked to provide opinions on certain claims of the '869 Patent (Ex. 1004) in light of the prior art.

A. Anticipation

19. Counsel has advised me that for a patent claim to be valid, the claimed invention must be novel. Counsel has further advised me that if each and every element of a claim is disclosed in a single prior art reference, then the claimed invention is anticipated, and the invention is not patentable. For the invention to be anticipated, all of the elements and limitations of the claim must be shown in a single prior art reference, arranged as in the claim. A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. For a reference to inherently disclose a limitation, that claim limitation must necessarily be present in the reference.

B. Obviousness

20. Counsel has also advised me that a claimed invention is unpatentable if the differences between the invention and the prior art are such that the subject matter as a whole would have been obvious at the time the alleged invention was made to a person having ordinary skill in the art to which the subject matter pertains. I also understand that an obviousness analysis takes into factual inquiries including the level of ordinary skill in the art, the scope and content of the prior art, and the

differences between the prior art and the claimed subject matter.

21. It is my understanding that the Supreme Court has recognized several rationales for combining references or modifying a reference to show obviousness of the claimed subject matter. Some of these rationales include the following: combining prior art elements according to known methods to yield predictable results; simple substitution of one known element for another to obtain predictable results; a predictable use of prior art elements according to their established functions; applying a known technique to a known device to yield predictable results; choosing from a finite number of identified, predictable solutions, with a reasonable expectation of success; and some teaching, suggestion, or motivation in the prior art that would have led one of ordinary skill to modify the prior art reference or to combine prior art reference teachings to arrive at the claimed invention.

22. I am informed that obviousness should not be determined using hindsight; rather, the inquiry must be from the perspective of a person of ordinary skill in the art at the time that the invention was made. I am informed that there is no requirement that the prior art contain an express suggestion to combine known elements to achieve the claimed invention; a suggestion to combine known elements to achieve the claimed invention may come from the prior art as a whole or individually, and will be viewed in light of the knowledge of one skilled in the art. The inferences and creative steps a person of ordinary skill in the art would typically

employ are also relevant to the determination of obviousness.

23. When a work is available in one field, design alternatives and other market forces can prompt variations of it, either in the same field or in another. If a person of ordinary skill in the art can implement a predictable variation and would see the benefit of doing so, that variation is likely to be obvious. When there is design need or market pressure and there are a finite number of predictable solutions, a person of ordinary skill in the art has good reason to pursue those known options.

24. It is my understanding that there is no rigid rule that a reference or combination of references must contain a “teaching, suggestion, or motivation” to combine references. But, I understand that a “teaching, suggestion, or motivation” can be a useful guide in establishing a rationale for combining elements of the prior art.

C. Priority

25. In order to determine whether a reference qualifies as prior art for a given patent claim, one must determine the applicable priority date for that patent claim. I understand that in many cases the priority date is the actual filing date of the patent application or patent at issue. In certain cases, however, patent claims may be entitled to “priority” based on one or more earlier applications referenced on the face of the patent.

26. In order for a claim of a patent to be entitled to claim priority to an

earlier filed application, I understand that the earlier filed application needs to have sufficient “written description” to support that claim.

27. When determining whether a specification contains adequate written description of the claimed invention, I understand that one must make an objective inquiry into the four corners of the specification from the perspective of a POSITA.

28. Further, I understand that the standard for written description is stricter than the standard for determining whether or not a patent claim would have been obvious based on the prior art.

29. In particular, the question for purposes of written description is not merely whether the claimed invention is an obvious variant of what the specification discloses. Instead, the application itself must describe the invention, and do so in sufficient detail that one skilled in the art can clearly conclude that the inventor invented the claimed invention as of the date when the specification was filed.

30. Similarly, I understand that the issue of written description is separate from the question of “enablement” (i.e., whether a specification allows a person of ordinary skill to practice the claimed invention without undue experimentation). A specification may adequately enable a claimed invention yet fail to provide written description support.

31. Finally, I understand that the standard for whether or not a disclosure is sufficient to support a claim is different than the standard for whether a disclosure

anticipates a claim. To support a claim, the description must be sufficient to convey to a POSITA that the inventors were in possession of the full scope of the claimed subject matter.

32. By contrast, a description anticipates a claim if it discloses even a single species within the scope of the claim. Thus, in the case of “genus” claims covering two or more different species, I understand that there can be situations in which a given disclosure is sufficient to anticipate the claim even though that same disclosure is not adequate to support the claim and entitle the inventors to an earlier priority date.

33. I understand that in order to claim priority to an application through a chain of applications, every single application in the chain (going back to the particular application on which the inventors want to rely) needs to support the claim as a matter of written description.

34. In other words, each application in the chain must allow a person of ordinary skill to discern that the inventors were in possession of the claimed invention at the time of the application.

III. Qualifications of A Person Having Ordinary Skill in the Art (POSITA)

35. I understand that a patent should be analyzed from the perspective of a POSITA at the time of the alleged invention. I have been informed that the factors

considered in determining the level of ordinary skill of a POSITA include: (1) the educational level of the inventor; (2) the type of problems encountered in the art; (3) prior art solutions to those problems; (4) the rapidity with which innovations are made; (5) the sophistication of the technology; and (6) the educational level of active workers in the field. I understand that these factors are not exhaustive but are merely a guide to determining the level of ordinary skill in the art.

36. It is my opinion that a person of ordinary skill in the art would have had a bachelor's degree in a relevant field (e.g., mechanical engineering or industrial design), and at least two years of product design experience and/or industry experience with juvenile products. More education can replace product design experience, and vice versa. It is my opinion that this level of ordinary skill in the art would apply regardless of whether the date of alleged invention is around 2008 (the earliest claimed priority date) or later.

37. I meet or exceed these requirements for a POSITA. I have worked with many POSITAs and can evaluate documents from their perspective.

IV. State of the Art

A. Overview of Strollers

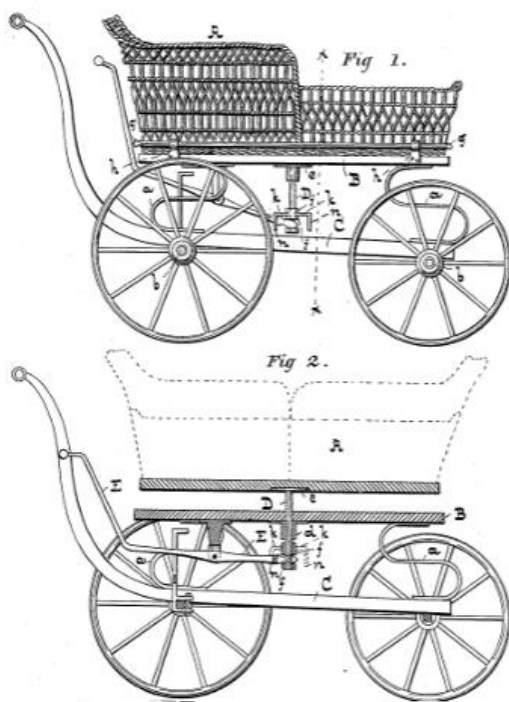
38. A stroller is a rolling device used to transport children. Strollers (also known as perambulators, pram, push chairs, or bassinets) have existed for several centuries. (Ex. 1025, Sewell, 716–728.) Samuel J. Sewell's article from the 1920s

described some well-known aspects of stroller designs.

1. **Wheels** – including how the wheels could be detachable to allow the stroller to be folded. (Ex. 1025, Sewell, 724.)
2. **Springs** – allowing for a smoother stroller ride. (Ex. 1025, Sewell, 724–725.)
3. **Variable Bodies** – allowing for “folding, converting, adjusting and reversing” the body frame. (Ex. 1025, Sewell, 725.) This allowed adjustability so the stroller allowed for one child to lie down while another child could sit (Ex. 1025, Sewell, 725–726.)

39. Early designs for strollers put an emphasis on stopping the stroller from tipping over, preventing the child from falling out, or having the stroller roll away. (Ex. 1025, Sewell, 724.)

40. Strollers include one or more seats to accommodate one or more children. The seat or seats may be fixed or movable. Strollers with a reversible seat have been around more than a century. In the 1880s, William Richardson designed a reversible baby stroller that permitted the user to decide whether the child faced the user, or faced in the direction the stroller was pushed. (Ex. 1026, U.S. Patent No. 405,600 (“Richardson”).) U.S. Patent No. 405,600 also discloses how the stroller seat can be reversible in direction via rotation around a “king bolt.”



“In the invention described in the said application the body of the carriage, when elevated, may be rotated or turned entirely around on its axial king-bolt”

(Ex. 1026, Richardson, 1:15–18 and Figs. 1, 2.)

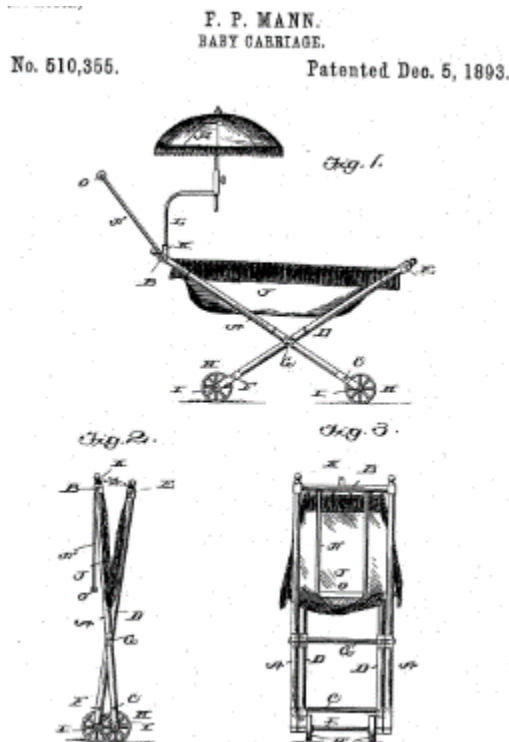
B. Basics of Stroller Structure

1. Basics of Stroller Structure

41. A stroller frame is the backbone of the stroller and supports the seat(s) and other components. Stroller frames are typically formed of metal or plastic. The frame will generally include a handlebar or push bar for pushing and steering the stroller and three or more wheels. The handlebar is typically connected to, or integral with, a pair of longitudinal side members. One or more crossbars may connect between the longitudinal sides. The front wheel(s) may be directly or indirectly connected to the longitudinal side members. The rear wheels are usually connected to the longitudinal sides by one or more intermediary components.

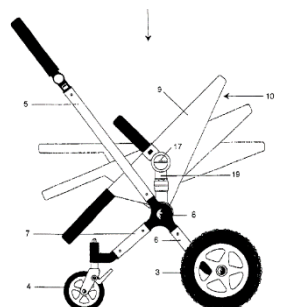
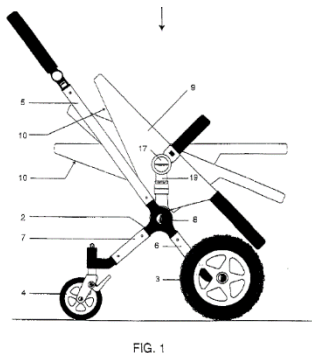
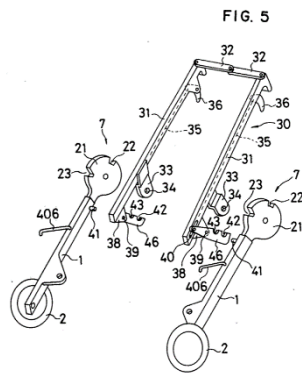
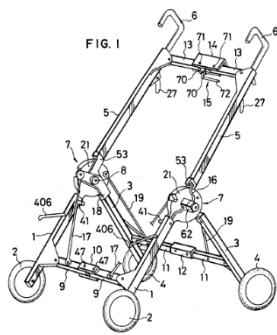
42. The X-frame was an early design from the late 1890s and included two

main crossbars in an “X” configuration. (Ex. 1027, U.S. Patent No. 510,355.) A pivot point was located in the center of the “X” to allow the stroller to be collapsed for “compactness.” (Ex. 1027, U.S. Patent No. 510,355, ll. 22–31.)



Ex. 1027, U.S. Patent No. 510,355, FIGS. 1–3

43. Another well-known stroller frame design included an upper frame tube and a lower frame tube joined together to form the longitudinal side members. (See e.g., Exs., 1029, 1033, and 1040.) The joint between the upper and lower tube usually allowed movement between the upper and lower tube as explained in Exhibits 1029, 1033, and 1040.



The hammock supporting frame 30 comprises side links 31 and foldable-in-two back-rest connecting links 32 interposed between the upper ends of said links 31. Secured to relatively lower regions of the side links 31 are support frame pivotal mounts 33 having openings 34 for receiving the previously mentioned pivot pins 8 for the pivotal mounts 8, said hammock support frame 30 being pivotally supported with respect to the front legs 3 similarly to the push rods 5 and rear legs 3.

(Ex. 1029, U.S. Patent No. 4,191,397, 4:26–35 and Figs. 1, 5.)

FIGS. 1 to 4 show the buggy 1, which comprises a frame 2 with front wheels 3 and rear wheels 4, a pull and push bar 5, front wheel bars 6 and rear wheel bars 7, which support the front wheels 3 and rear wheels 4 and which are connected to the pull and push bar 5 by means of a coupling device 8.

(Ex. 1030, U.S. Patent No. 6,513,827 to Barenbrug, 2:50–55 and Figs. 1, 2.)

44. A 2007 YouTube video for the “UPPAbaby Vista” stroller also

discloses a foldable frame having a U-shape bottom frame assembly.^{1, 2}



Ex. 1031, Holly Schultz Dec., Ex. 2 at 21secs., 1 min. 18secs.

¹ See Exhibit 1031, Declaration of Hollie Schultz (“Hollie Schultz Dec.”), ¶¶14-17.

² I understand the Ms. Schultz has provided a declaration confirming this video was uploaded and made publicly available without restrictions on YouTube on June 12, 2007.



Ex. 1032, Declaration of Greg Allen, Ex. 3³ 4

2. Folding Mechanism

45. The foldability or collapsibility of child strollers is a common and well-known design element allowing strollers to be easily stored (e.g., within a trunk of a vehicle) or transportable when not in use. These developments were widely documented in the patent literature and demonstrated the industry's focus on balancing convenience with structural integrity.

46. By 2008, various folding mechanisms for child strollers existed. These included flat fold, umbrella fold/three-dimensional fold, two-piece fold, compact tri-

³ See Exhibit 1032, Declaration of Greg Allen (“Greg Allen Dec.”), ¶¶ 14-15 and Ex. 3—*How Sweet Is The iCandy Apple Stroller?* DaddyTypes Blog, (July 7, 2006) https://daddytypes.com/2006/07/07/how_sweet_is_the_icandy_apple_stroller.php

⁴ I understand Greg Allen has provided a declaration confirming these images were uploaded and made publicly available without restrictions on his blog DaddyTypes on July 7, 2006.

fold, one-hand fold, one-touch fold, one-step fold, five-second fold, quick fold system, and standing fold. (Ex. 1031, Hollie Schultz Dec., Ex. 10, 284–286.)

47. Examples of “flat fold” mechanisms are described in U.S. Patent Nos. 7,641,216, 3,390,893, and 4,398,748. As shown below, these patents disclose a stroller than can fold flat (i.e., collapse upon itself) so as not to increase the footprint of the stroller when folded. These strollers use a folding joint between the upper and lower tubes of the longitudinal frame members.

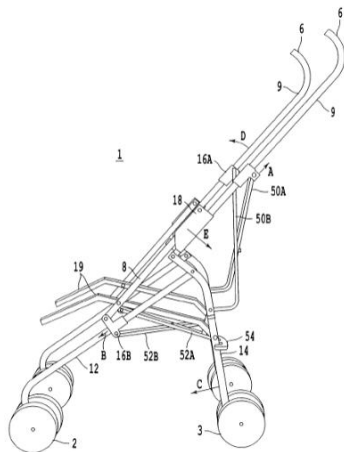


Fig. 1

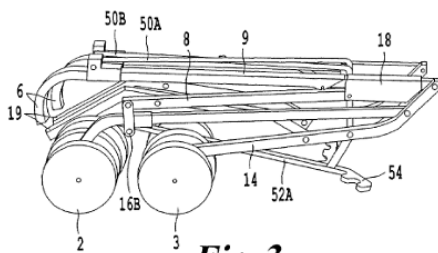
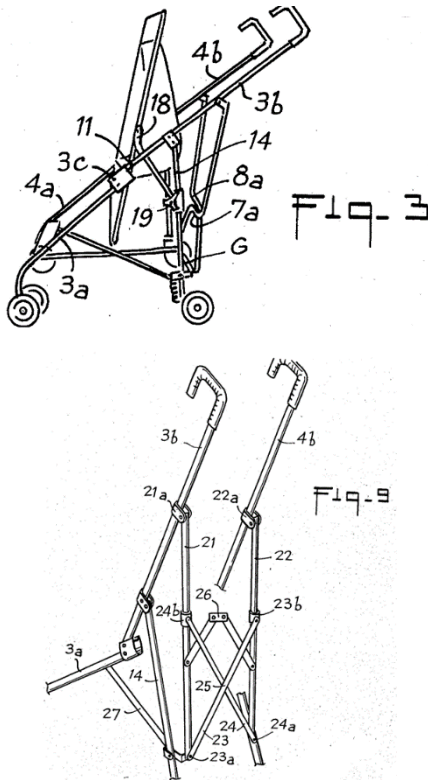


Fig. 3

Exemplary aspects of the invention provide a method of folding a stroller including two handle frames, two front legs and two rear legs configured to support the stroller in an upright position, the front legs pivotally attached to respective rear legs, a chair portion, including a back rest, a seat and a leg rest pivotally attached to the seat, two pivot frames pivotally attached to respective handle frames, the back rest and the rear legs, two arm rests, and two sliders pivotally attached to respective pivot frames, the back rest, respective arm rests and the seat and configured to slide along the respective front legs.

(Ex. 1033, U.S. Patent No. 7,641,216, 3:15–24 and Figs. 1, 3.)



[C]hild's stroller constituted by a frame 1 and a body 2 pivoted on the frame. The frame 1 comprises in known manner two lateral carrier elements 3 and 4, substantially parallel to each other, defining in unfolded position an inclined frontal plane. Each of these carrier elements 3 and 4 is composed of two parts 3a, 3b; 4a, 4b, articulated on one another (at 3c for the carrier element 3) so as to be foldable on themselves about this articulation.

(Ex. 1034, U.S. Patent No. 4,398,748, 3:27–35 and Figs. 3, 9.)

48. These folding designs continue to be used in modern commercial products. For instance, foldable strollers available in 2007–2008 included the UPPAbaby Vista stroller, the Joovy Caboose stroller, the Mutsy 4Rider stroller, the Valco Baby TriMode stroller, the Dreamer Design Park Avenue stroller, the Graco Quattro Tour Duo stroller, and the Peg Perego Skate stroller—all featured in videos showing folding and unfolding on the Baby Gizmo YouTube channel.⁵

⁵ See e.g., Ex. 1031, Hollie Schultz Dec., Ex. 2—BabyGizmoCompany, *Baby Gizmo Uppa Baby Vista*, YouTube, <https://www.youtube.com/watch?v=9IrmQs8kL5I> (June 12, 2007); see also Ex. 1031, Hollie Schultz Dec., ¶¶14, 18 (It is my



Ex. 1031, Hollie Schultz Dec., Ex. 2 at 2 mins. 10 secs., 2 mins. 19 secs.

49. The folding mechanisms include an associated actuator, such as a button or pull strap, that is operably coupled thereto and releases the locks of the folding mechanism, allowing the stroller to be folded. An example of this is disclosed in U.S. Patent Publication No. 2008/0238042 (Ex. 1035.)

understanding that paragraph 18 mistakenly identifies the Uppa Baby Vista stroller as the Baby Planet Unity Sport Double stroller).

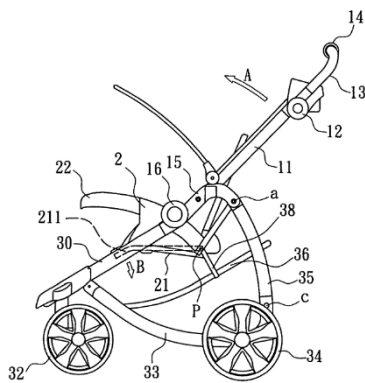


Fig.5A

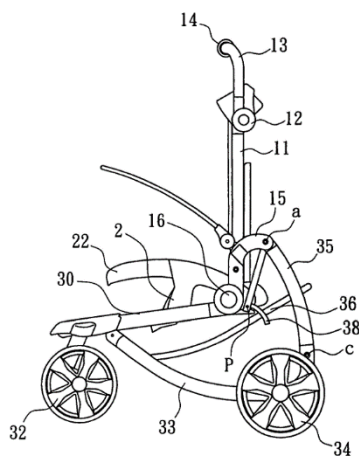


Fig.5B

The stroller shown in FIG. 5A is in a fully expanded state and when the stroller needs to be collapsed, the user first operate **the collapsing operation device 14** disposed on the handle 13 to actuate the locking member (a first locking device) disposed on the upper frame tube 11 or the connecting member 15 to cause the upper frame tubes 11 unlocked from the front legs 30 and thus the upper frame tubes 11 and the handle 13 is able to pivot forwardly about the connecting seat 16 toward the front legs 30 (as indicated by arrow A), and the front legs 30 in turn pivot downwardly toward the base frame tubes 33 (as indicated by arrow B) and into a state in which they are substantially parallel to the supporting tubes 211 of the seat portion 21 of the seat unit 2 (i.e., the biasing spring 50 is not twisted), as shown in FIG. 5B.

(Ex. 1035, U.S. Patent Publication No. 2008/0238042, ¶ 0034 (emphasis added) and Figs. 5A, 5B).

3. Stroller Wheels

50. It is also well known that strollers may include any combination of front and rear wheels. The number of wheels and location are not design critical and are typically chosen to comply with other more critical aspects of the design.

The number of wheels is irrelevant; you're looking for a good turning radius, easy maneuverability, and quality wheels.

(Ex. 1031, Hollie Schultz Dec., Ex. 10—*The Baby Gizmo Buying Guide*, 291.)

51. Most strollers include two wheels (or wheel pairs) in the rear, whereas

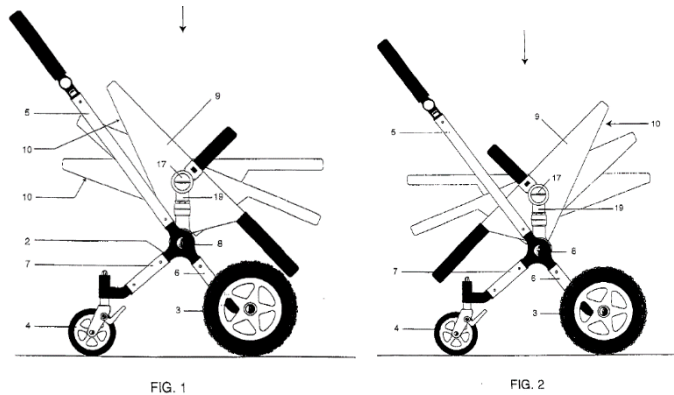
the front varies with common configurations being one, two, or three wheels (or wheel pairs). For instance, jogging strollers commonly have a single, large front wheel. (Ex. 1031, Hollie Schultz Dec., Ex. 10—*The Baby Gizmo Buying Guide*, 324–325.) In contrast lightweight/umbrella strollers come in both three-, four-, or other multi-wheel variants. (Exs. 1040 (three wheels), 1029 (four wheels), 1033 (eight wheels)) Designers have long understood the pros and cons of different wheel sizes, placements, and configurations; therefore, choosing among them is a routine exercise for stroller designers.

4. Rotatable and Detachable Seats

52. Another known design aspect of strollers—both single and doubles—is the ability to have one or both seats be detachable/reversible thereby providing various functionality for the stroller.

53. As I previously discussed, U.S. Patent No. 405,600 describes a stroller having a rotating carriage that allowed the child to face forward or backward. (Ex. 1026, Richardson, 11 54–58.)

54. U.S. Patent No. 6,513,827 (“’827 Patent”) (Ex. 1030, Barenbrug) is a more modern example of a stroller having a reversible seat. Unlike earlier designs, the seat of the ’827 Patent is completely detachable from the frame to allow for reversal.



Ex. 1030, Barenbrug, FIGS. 1, 2

55. The design disclosed in the '827 Patent proved to be a commercial success and has been widely copied. The assignee of the '827 Patent, Royalty Bugaboo Sarl, is a well-known stroller manufacturer that came to market in the United States in the early 2000s as the commercial “Bugaboo” stroller line.

56. The success of the Bugaboo design (which was commensurate with the embodiments disclosed in the '827 Patent) resulted in other stroller manufacturers launching similar designed strollers. (See e.g., Ex. 1032, Greg Allen Dec., Ex. 1⁶.)

57. Other strollers having detachable seats became available in 2007–2008. For example, the UPPAbaby Vista stroller, the Mutsy 4Rider stroller, and the Dreamer Design Park Avenue stroller all featured detachable and rotatable seats.

⁶ Ex. 1032, Greg Allen Dec., ¶ 7 and Ex. 1—*In The Beginning was the Bugaboo*, DaddyTypes Blog, (Sept. 13, 2004) https://daddytypes.com/2004/09/13/in_the_beginning_was_the_bugaboo.php.

58. Double strollers may also have reversible and detachable seats. For example, U.S. Patent No. 6,086,087 to Yang (Ex. 1037) shows a double tandem stroller with a front seat facing forward, facing backward, and a removable back seat.

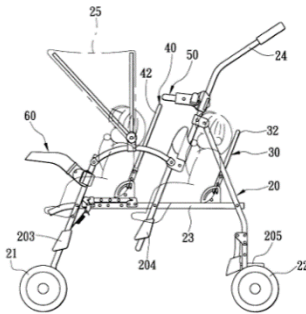


FIG. 12

(Ex. 1037, Yang, 6:51–54, Fig. 12.)

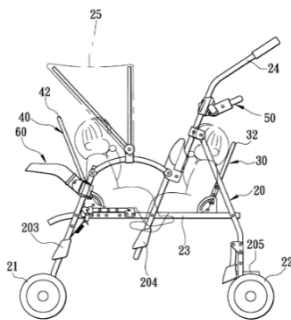


FIG. 13

(Ex. 1037, Yang, 6:55–59, Fig. 13.)

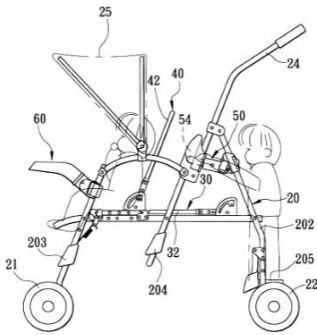


FIG. 14

FIG. 14 illustrates the preferred embodiment in a third state of use. As shown, the detachable seat member 40 is mounted on the stroller frame 20 such that the child to be seated thereon can face forwardly.

(Ex. 1037, Yang, 6:60–63, Fig. 14.)

59. Another example may be seen in U.S. Patent No. 5,338,096 to Huang, showing the front seat capable of being locked in a forward position or backward position.

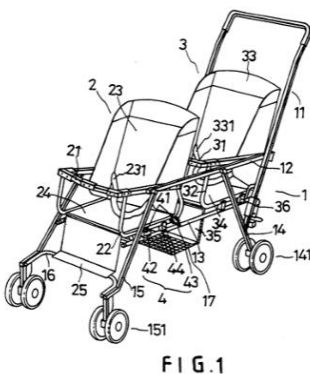


FIG. 1



FIG. 5

This invention has been devised to offer a double stroller with a front seat capable to be turned around to face a rear seat so that two babies sitting on the two seats may play with each other.

(U.S. Patent No. 5,338,096, 1:15–18.)

60. Further, there were commercial products available before late 2008 that had rotatable and detachable seats. For example, the Kolcraft Contours Options Tandem stroller had reversible seats capable of being oriented so either (A) both seats faced the parent, (B) both seats faced away from the parent, (C) the seats faced each other, (D) the seats were oriented back-to-back, or (E) only one seat was

attached. (Ex. 1038, Kolcraft Contours Options Tandem Instruction Sheet, 15⁷ (obtained from <https://web.archive.org/web/20081010100559/http://common.csnstores.com/common/marketing/baby/kolcraft/cnt1016instruction.pdf>, Oct. 10, 2008), Ex. A to Affidavit of Christopher Butler.)



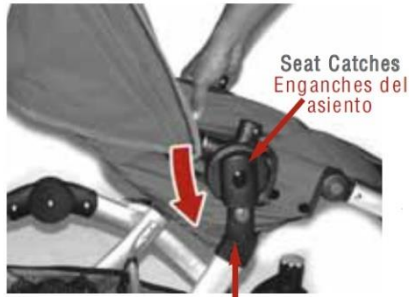
Ex. 1038, Kolcraft Contours Options Tandem Instructions, Cover Page



Ex. 1038, Kolcraft Contours Options Tandem Instructions, 15

61. The Kolcraft Contours Options Tandem instructions also disclosed how to attach the reversible seats to the frame:

⁷ Referenced page numbers are those found in the middle of each page directly below the instruction images.

- 
- 1
- Align **Reversible Seat** catches over frame hubs as shown and push Reversible Seat down onto the frame hubs until a “Click” is heard on both sides.
- 
- 2
- The button on the frame hubs should be seen through both **Reversible Seat** catches. Pull up on the seat to make sure the seat is securely attached.
- 3 Repeat Steps 1 and 2 for other **Reversible Seat**.
- NOTE:** To remove **Reversible Seat**, push both buttons on the frame hub in, than lift the Reversible Seat up.

Ex. 1038, Kolcraft Contours Options Tandem Instructions, 15–16

C. Stroller Types

62. Considering the state of the art of the stroller industry as of late 2008, the stroller market could be subdivided into the following general categories: carriages, single standard strollers, travel systems, lightweight-plus strollers, lightweight/umbrella strollers, luxury stroller systems, all-terrain strollers, jogging strollers, double standard strollers, double lightweight/umbrella strollers, double all-terrain strollers, double jogging strollers, strollers-and-a-half, and multiples strollers. (Ex. 1031, Hollie Schultz Dec., Ex. 10—*The Baby Gizmo Buying Guide*, 279–281.)

I summarize these design types below.

1. Single Strollers

63. Single-seat strollers, designed for transporting one child at a time, have been a staple for parents for decades. These strollers offer a compact and convenient solution for caregivers, allowing for easy navigation through crowded spaces and narrow pathways. While families with multiple children often own more than one single-seat stroller, managing multiple strollers simultaneously can be impractical for a single caregiver. As a result, the single-seat stroller remains the go-to option for parents prioritizing individualized attention and mobility for a single child. There were numerous issued patents and commercial products (e.g., Bugaboo and iCandy) that exemplified the common nature of these stroller designs.

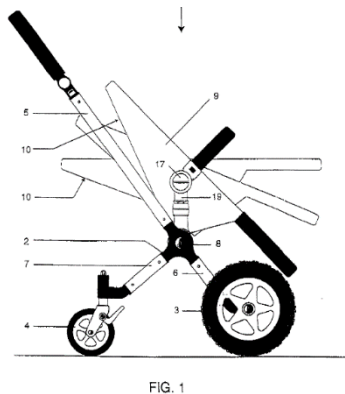


FIG. 1

Ex. 1030, Barenbrug, FIG. 1



Ex. 1032, Greg Allen Declaration, Exhibit 1 – Bugaboo Stroller



Ex. 1032, Greg Allen Declaration, Exhibit 3 – iCandy Apple Stroller

2. Double Strollers

64. Double strollers for transporting more than one child at a time were also well known by 2008. Many parents with multiple children have two or more single strollers, but it is cumbersome for one person to safely push and control multiple strollers simultaneously. To address the need to transport more infants, multi-child

strollers were developed. One of the earliest examples of a double stroller may be seen in U.S. Design Patent No. 162,495 granted in 1951:



U.S. Design Patent No. 162,495, FIG. 1

65. Double strollers can generally be split into two main types: side-by-side orientation of the seats and tandem orientation of the seats.

a. Side-by-Side Double Strollers

66. The side-by-side configuration places two seats next to each other, which may be ideal for families with twins or children of similar ages. Side-by-side strollers provide both children with an equal view and experience, often making them wider and harder to maneuver in narrow spaces. (Ex. 1031, Hollie Schultz Dec., Ex. 10—*The Baby Gizmo Buying Guide*, 330.)

67. Exemplary side-by-side double strollers include U.S. Design Patent No. D382,516:



U.S. Design Patent No. D382,516, FIG. 1

b. Tandem Double Strollers

68. A tandem-configured double stroller positions one child behind the other, significantly reducing the stroller's overall width compared to side-by-side designs. This configuration allows parents to navigate narrow doorways, crowded sidewalks, and other tight spaces more easily, making it a popular choice for urban environments.

69. Tandem strollers often feature seats that can be adjusted independently, providing flexibility in positioning each child for comfort and convenience. Some models also offer options to reconfigure the seats to face each other or the parent, adding versatility.

70. An exemplary tandem double stroller is disclosed in U.S. Patent No 5,911,432 to Song.

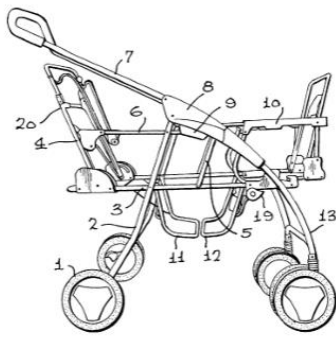


FIG. 1

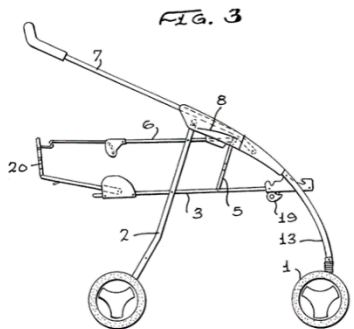


FIG. 3

This invention is directed to a baby carriage which can be easily switched from two seats to one seat and vice versa without making it difficult to fold the carriage.

(U.S. Patent No 5,911,432, 1:18–20 and Fig. 1.)

Because the front seat is connected to the carriage frame through a locking device and can be removed from the carriage frame by unlocking the locking device, this two seat carriage can be easily converted into a one seat carriage. The additional space created when the two seat carriage is converted into a one seat carriage allows the remaining seat to be adjusted to permit the child to lie flat in the seat.

(U.S. Patent No 5,911,432, 1:49–56 and Fig. 3.)

71. Tandem strollers can be sub-divided further into a sub-category called “stadium seating” tandem strollers. In contrast with Song, which shows each of the two seats at the same horizontal level, stadium seating places the children at different heights from the ground, allowing both children to have unobstructed views.

Tandem Seating

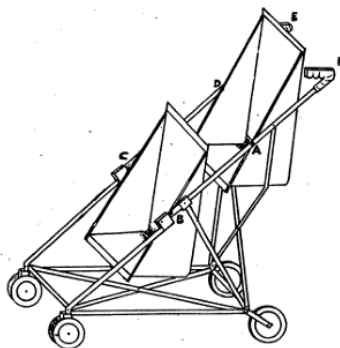
The most popular seating arrangement in double strollers is the tandem, where one seat sits in front of the other. Many tandems go one step further and offer stadium seating, giving the little guy in back a view from the top. Tandem strollers are usually very stable, but can be a nightmare to maneuver. To make things easier, you should load the heaviest weight in the back seat, over the



back wheels. While many manufacturers recommend placing an infant car seat carrier in the rear seat for safety (presumably so you can be closer to your baby), if you have a heavier toddler, this arrangement can be almost impossible to push. Many tandems only offer a full recline on the back seat, which is a total pain, because everyone wants to kick back sometimes. We look for tandems that allow both seats to recline. Many newer tandem strollers allow you to reverse the direction each seat faces independently, so your children can see where they're going, look at you, or even face each other.

Ex. 1031, Hollie Schultz Dec., Ex. 10 *The Baby Gizmo Buying Guide*, 329–330.

72. Tandem stadium-style double strollers may have the seats directly attached to the main frame of the stroller. For example, French Patent 2,615,155 to Boidin that issued in 1987. (Ex. 1039.)

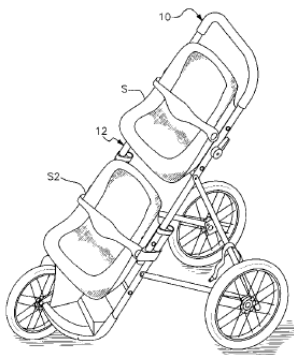


This stroller has two seats located on the same chassis at different heights.

(Ex. 1039, FR 2,615,155, ¶ 0003 and Fig. 2.⁸)

⁸ Ex. 1039 is a non-certified translation of French Patent 2,615,155 to Boidin.

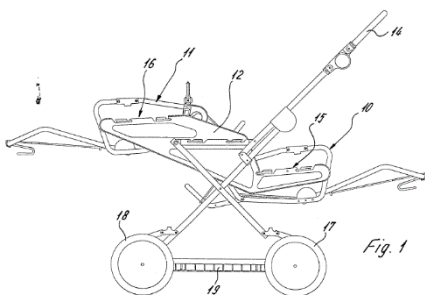
73. Another example of a tandem stadium-style double stroller is U.S. Patent No. 6,209,892 to Schaaf that issued in 2001 (Ex. 1040.)



It is a further object of this invention to provide a baby stroller for twins and other multiple numbers of children that supports the babies vertically with respect to one another such that the stroller is conveniently maneuverable and the babies' observation positions can be readily adjusted when desired.

Ex. 1040, Schaaf, 2:27–32, Fig. 10.

74. Some tandem double strollers include a subframe structure attached to the stroller frame to which two seats may be attached in a stadium-style orientation. An example may be seen in EP 0980810 to Gotting and assigned to stroller manufacturer Britax, which issued in 1998. (Ex. 1041.)



In a preferred embodiment, the seats are attached to two attachments on the sides of the frame. These attachments are designed such that they can be mounted in two positions, to obtain the above possibilities for overlapping the seats.

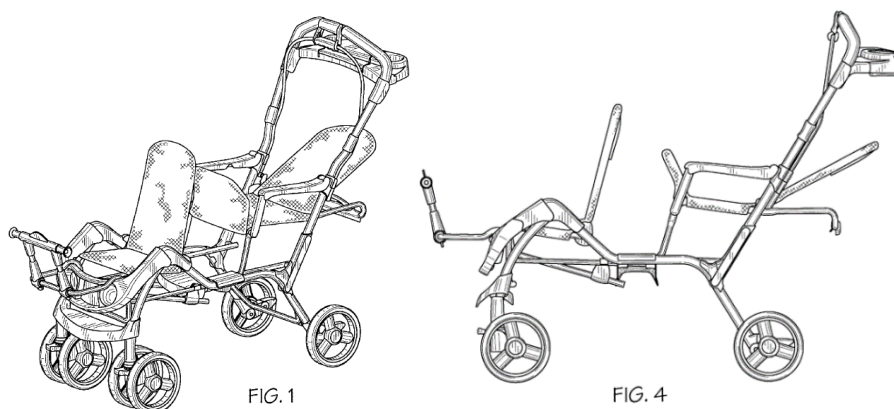
Ex. 1041, EP 0980810, ¶ 0007.

75. Another example is the commercial “Bebe Confort” which was introduced in 2004.

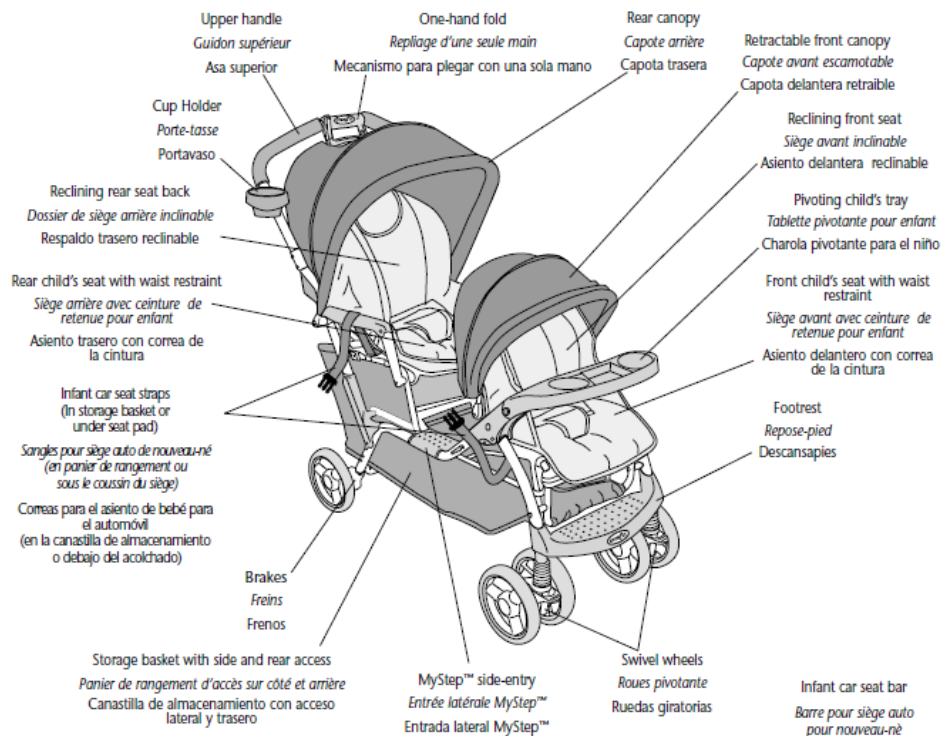


Ex. 1032, Greg Allen Dec., Ex. 2—*Bebe Confort Twin Stroller*.

76. Another example of a tandem double stroller is disclosed in U.S. Design Patent 514,036, which was granted in 2006 and is assigned to Evenflo Co. Inc. (Ex. 1042.) As seen in the Figures of U.S. Design Patent 514,036, the front seat is oriented at a lower vertical position than the back seat. A 2004 stroller by Evenflo called the “Take Me Too” illustrates a commercial version of a tandem double stroller.



Ex. 1042, U.S. Patent Design 514,036, FIGS. 1 and 4



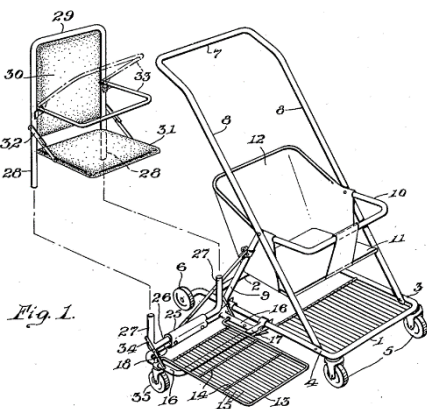
Ex. 1043, Take Me Too Manual, pg. 1

77. Each of these strollers demonstrate how stadium-style seating can be achieved through variations in frame structure and seat attachment mechanisms and that these designs were well known by at least 2008. These designs illustrate different approaches to elevating one seat relative to the other to provide improved visibility and accessibility for the child seated in the rear position and underscore the evolution of double tandem stadium strollers before 2008. This plethora of example stadium style seating prior to 2008 underscores that mixing and matching various features of these disclosed designs was merely routine design work to a POSITA by 2008.

3. Single-to-double or Double-to-triple Strollers

78. By 2008, designs for strollers capable of converting from a single stroller to a double stroller upon the birth of a second child were well established in the art. These convertible stroller designs provided a practical solution for growing families, offering flexibility and cost savings by eliminating the need to purchase a separate double stroller. Typically, such strollers featured modular systems that allowed for the addition of a second seat or a ride-along platform, enabling parents to adapt the stroller to their changing needs. Designs for single-to-double strollers included attachments intended to convert any single stroller into a double stroller, while other strollers were specifically designed to expand from a single to a double.

79. Single-to-double strollers that attached a second auxiliary seat were well known in the art to create a tandem stroller. For example, U.S. Patent No. 3,000,645 to Schmidt disclosed a removably attachable second seat attachable to the side of the stroller, creating a side-by-side orientation of the children.



A further object, therefore, is to provide the combination of any well known form of baby carriage with a readily attachable and detachable auxiliary vehicle, which preferably is supported at its outer free edge portion by a single wheel, and otherwise essentially comprises a platform capable of satisfactorily supporting one or more children other than the occupant of the baby carriage, and upon which may be readily mounted a preferably detachable seat[]

(U.S. Patent No. 3,000,645, 1:20–28.)

80. Other single-to-double strollers attached a second seat in front of the first seat to create a tandem stroller. For example, U.S. Patent No. 6,045,145 to Lan discloses a stroller and an auxiliary seat unit mountable to the stroller. (Ex. 1044.)

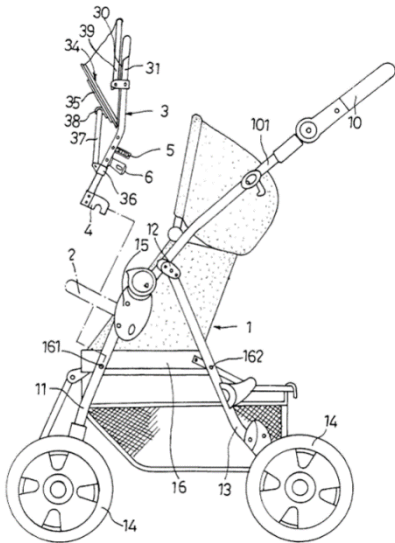


FIG. 1

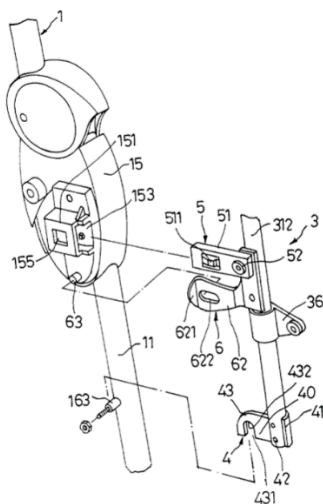


FIG. 4

Referring to FIGS. 1 and 3, the auxiliary seat unit 3 is to be mounted on a front side of the main frame 1, and generally includes an auxiliary frame 31, a seat portion 34, and a support frame member 37.

(Ex. 1044, U.S. Patent No. 6,045,145, 2:22–25.)

Referring to FIG. 4, the locking unit 5 includes a pair of hollow locking seats 151 formed on inner sides of the connecting seats 15, and a pair of first insert members 51 mounted pivotally and held frictionally on the mounting posts 312 of the auxiliary frame 31 by means of a pair of pivot pins 52. Each of the locking seats 151 is formed with an insert hole 153 which opens forwardly, and has a side wall formed with a locking opening 155 communicated with the insert hole 153. Each of the first insert members 51 is insertable into the insert hole 153 of a respective one of the locking seats 151, and is formed with a resilient locking protrusion 511 which extends through and which engages the locking opening 155 when the first insert member 51 is inserted into the respective locking seat 151, thereby preventing undesired removal of first insert members 51 from the locking seats 151. The auxiliary seat unit 3 can thus be mounted on the front side of the main frame 1. The locking protrusions 511 are depressible for retraction into the locking seats 151 to permit release of the first insert members 51 from the locking seats 151.

(Ex. 1044, U.S. Patent No. 6,045,145, 3:13–32.)

81. A commercial stroller design by iCandy included a conversion kit or subframe that allowed a single-seat stroller to be converted for use as a double-seat stroller. This subframe assembly would use the existing connection mechanism that existed when the stroller was used solely as a single-seat stroller. As shown below right, the subframe would then connect to the stroller frame allowing for either one or two seats to then be connected (shown below middle).



Ex. 2025, Greg Allen Dec., Exs. 3 and 5

4. Travel Systems

82. Travel stroller systems allow a compatible infant car seat to be securely attached to the stroller frame. These systems allow parents to use the stroller frame with an infant car seat during the early months and transition to a standard stroller seat as the child grows. This design is often marketed as providing convenience for caregivers because it proports to enable seamless transitions between a vehicle and the stroller without disturbing the child. In practice, some of these systems are easier

to use than others.

83. The basic travel stroller system offered was a standard single or double stroller with one or two seats for children and the ability to either directly or indirectly attach and secure an infant car seat to the stroller frame. Strollers that allowed for direct attachment of an infant car seat are disclosed in U.S. Design Patent No. 429,476 assigned to Graco Children's Products, Inc. (See also U.S. Design Patent No. 430,076.) Design Patent No. 429,476 is shown below:

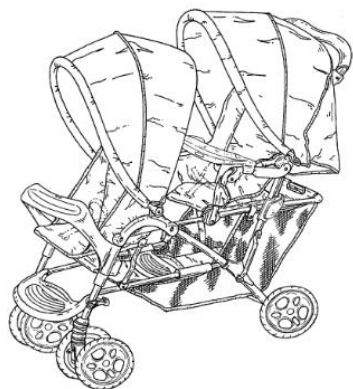


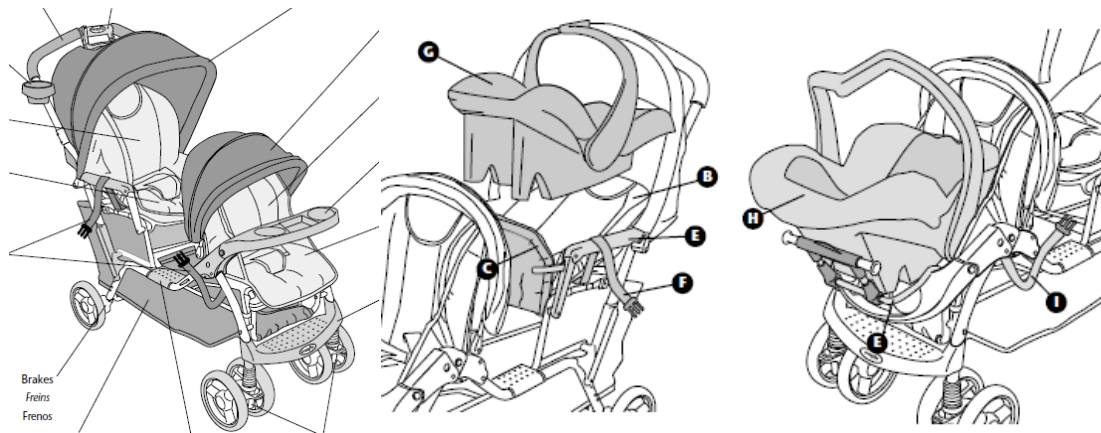
FIG. 1



FIG. 8

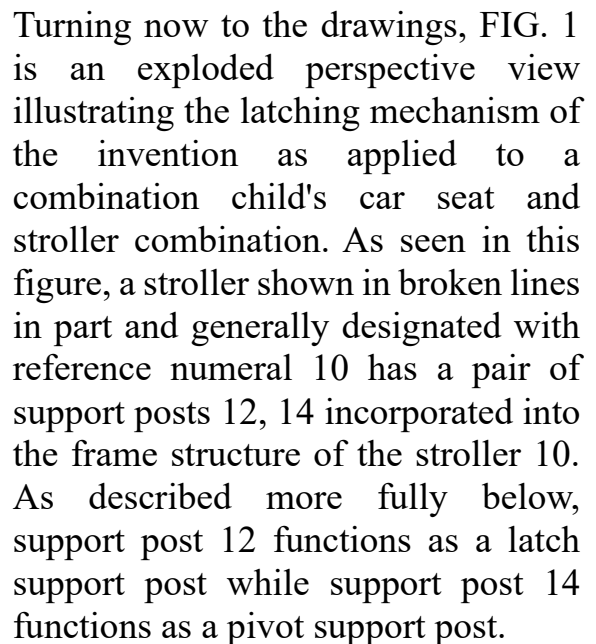
U.S. Design Patent No. 429,476, FIGS. 1 and 8

84. Exemplary commercial products include the Evenflo Take Me Too (Ex. 1043, Evenflo Take Me Too Manual, Oct. 2004,) which each allowed for placement of an infant car seat over the back seat, or over the front seat.



Ex. 1043, Evenflo Take Me Too Manual, 1, 13, 14

85. Strollers designed for indirect attachment of an infant car seat typically required the use of an infant seat attachment. Once installed, the attachment enabled users to securely attach the car seat to the stroller frame, providing a stable and reliable connection. For example, U.S. Patent No. 5,794,951 to Corley discusses use of auxiliary attachments to install prior to infant car seat installation (Ex. 1045.)



86. Related to travel systems, stroller frames designed exclusively for use with an infant car seat were also widely commercially available by 2008. These lightweight and compact frames served as a minimalist solution for parents seeking a convenient and portable option during the early stages of their child's life. The frames typically featured universal attachments or brand-specific compatibility, allowing the infant car seat to securely click into place. Once the child outgrew the infant car seat, these frames were often retired, making them a short-term but practical investment for newborns and infants.

87. Stroller frames containing attachments for car seats were available on the market by 2008. For example, the Bebe Confort was commercially available and

offered for sale before 2008 (Ex. 1032, Greg Allen Dec., ¶¶ 10-11 and Ex. 2.)⁹



Ex. 2025, Greg Allen Dec., Ex. 2

88. Each of these strollers demonstrate how stadium-style seating can be achieved through variations in frame structure and seat attachment mechanisms. These designs illustrate different approaches to elevating one seat relative to the other to provide improved visibility and accessibility for the child seated in the rear position and underscore the evolution of double tandem stadium strollers before 2008.

89. Another known travel system was the “Vista” stroller which was designed by Uppababy and commercially available by June 2007. (*see* Ex. 1031, Declaration of Holly Schultz, ¶¶14-18).

⁹ *Bebe Confort Twin Club Looks Great*, DaddyTypes Blog, (Sept. 24, 2004)
https://daddytypes.com/2004/09/24/bebe_confort_twin_club_looks_great.php



See Youtube video at: <https://www.youtube.com/watch?v=9IrmQs8kL5I>

90. On September 10, 2008, Uppababy introduced a device called the “RumbleSeat” which could be the Vista stroller at the ABC Kids Expo in Las Vegas. The RumbleSeat was an optional seat assembly connectable to the Vista to provided a dual-seat configuration. (Ex. 1032, ¶¶30-34, Ex. 7.)

Though the details are still shrouded in flash glare--or cropped out of the photo entirely, Pish Posh Baby has the scoop from ABC Kids Expo in Las Vegas, where Uppababy debuted a poster of a removable underseat seat for their flagship stroller, the Vista. The RumbleSeat allows you to stack your kids Phil & Teds-style, only they're facing toward you, so it's totally different.

(Ex. 1032, Ex. 7, pg. 46)



Ex. 1032, Ex. 7, pg. 46



See <https://www.flickr.com/photos/24570716@N06/2844563925/>¹⁰

91. According to the 2008 blog post, the RumbleSeat was a removable “underseat .. for [Uppababy’s] flagship stroller, the Vista.” (Ex. 1032, Ex. 7, pg. 46.) that was connected to the lower tubes of the frame. As I have annotated below, attached to the ends of the U-shape frame were right and left beige/black brackets that allowed the RumbleSeat to be removably coupled to the right and left support members of the frame (see red circles). Each of the brackets included a receptacle

¹⁰ This “Flickr” link was provided in the September 2008 post by daddytypes (See Ex. 1032, ¶33 and Ex. 7, pg. 46.)

located on the top of the bracket for receiving the corresponding end of the U-shaped frame therein. The lower portion of each bracket was configured to couple with the lower tube of the frame.



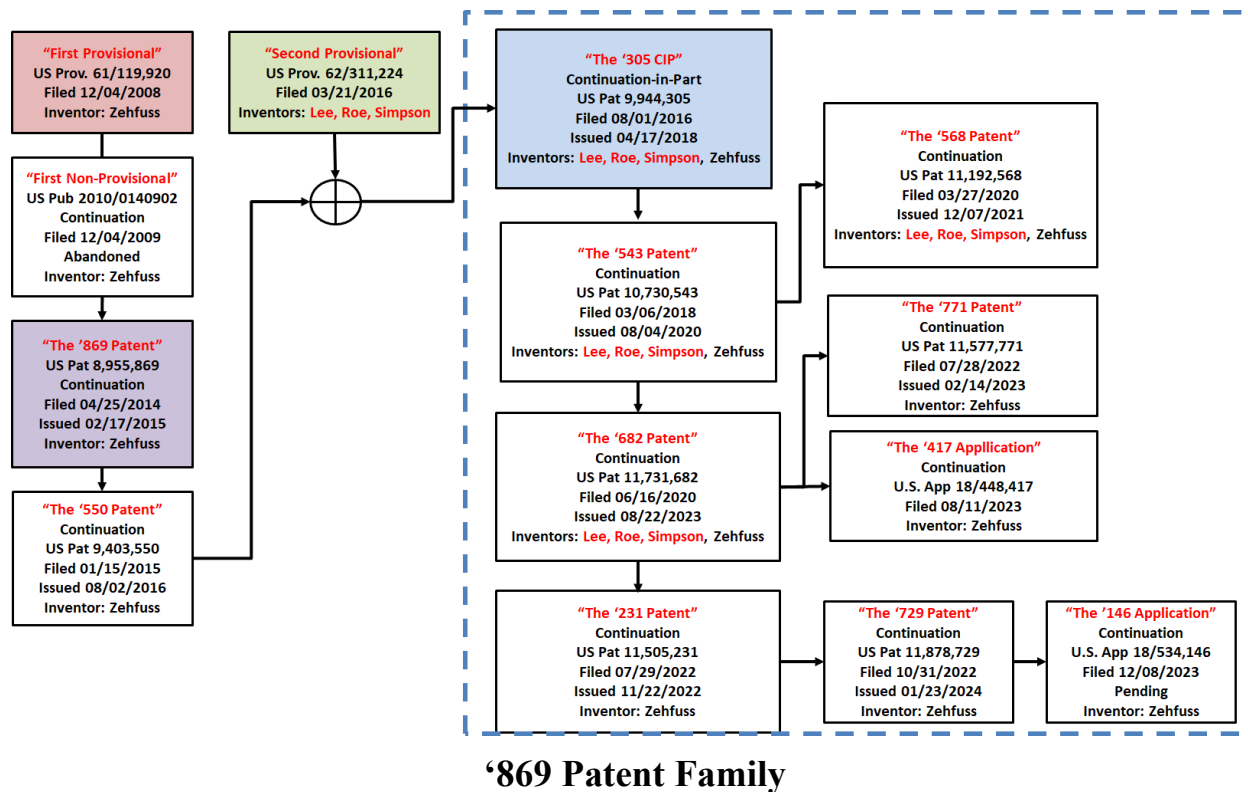
Uppababy Rumbleseat

V. Overview of the Baby Jogger Patent Family

92. The Baby Jogger family of related patents is illustrated below. As shown, and further explained below, both a December 4, 2008 application (“First Provisional”) and a December 4, 2009 original application (“First Non-Provisional”) named only Mark Zehfuss as the inventor.

93. A March 21, 2016 second provisional application (“Second Provisional”) and a subsequent August 1, 2015 continuation-in-part application (“the ’305 CIP”), which claimed priority to both the First and Second Provisional

applications, identified Mr. Zehfuss and three new inventors—John Lee, Megan Roe, and Noel Simpson.



A. The First Provisional

94. As shaded in red in the above graphic, the Baby Jogger Patent Family begins with the December 4, 2008 filing of U.S. Provisional Patent Application No. 61/119,920 (Ex. 1002; “the First Provisional”). (Ex. 1009, '568 Patent, 1:17–34.)

95. The First Provisional only lists Mark Zehfuss as the sole inventor.



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APPLICATION NUMBER	FILING or 371(c) DATE	GRP ART UNIT	FIL FEE REC'D	ATTY DOCKET NO	TOT CLAIMS	IND CLAIMS
61/119,920	12/04/2008		110	DYN005		

6980
TROUTMAN SANDERS LLP
600 PEACHTREE STREET, NE
ATLANTA, GA 30308

CONFIRMATION NO. 6909
FILING RECEIPT



Date Mailed: 01/02/2009

Receipt is acknowledged of this provisional patent application. It will not be examined for patentability and will become abandoned not later than twelve months after its filing date. Any correspondence concerning the application must include the following identification information: the U.S. APPLICATION NUMBER, FILING DATE, NAME OF APPLICANT, and TITLE OF INVENTION. Fees transmitted by check or draft are subject to collection. Please verify the accuracy of the data presented on this receipt. If an error is noted on this Filing Receipt, please submit a written request for a Filing Receipt Correction. Please provide a copy of this Filing Receipt with the changes noted thereon. If you received a "Notice to File Missing Parts" for this application, please submit any corrections to this Filing Receipt with your reply to the Notice. When the USPTO processes the reply to the Notice, the USPTO will generate another Filing Receipt incorporating the requested corrections

Applicant(s)

MARK ZEHFUSS, Residence Not Provided;

Power of Attorney: None

Ex. 1002, First Provisional, pg. 1

96. In reviewing the First Provisional, I have identified two different embodiments relating to a single seat stroller convertible to a double-seat stroller. The first embodiment, which I reference as "Embodiment A," for converting a single-seat stroller to a double-seat stroller is disclosed using Figures 1-3.

[0018] A side view of an embodiment a single stroller 10 is shown in Figure 1. As a note, Figure 1 shows only one side of the single stroller 10, however, most components include a complementary component on the other side of the single stroller but are not shown in Figure 1. The single stroller 10 comprises a frame 12 that supports seat 13. The frame 12 may, optionally, include a folding mechanism 16 that allows the stroller 10 to be folded to a more convenient size for storing or transporting the stroller 10.

■ ■ ■

[0020] The embodiment of the stroller 10 comprises two connector portions 17. The connector portions are preferably on the front of the stroller to allow the attachment and the seat to be connected to the front of the stroller 10. The connector portions 17 allow an attachment such as a conversion kit for converting the single stroller 10 to a double stroller, as shown in Figure 3, to be connected to the stroller. The embodiment of the stroller 10 has a left side and right side connector portions 17. An embodiment of an attachment of stroller 10 will comprise corresponding attachment portions capable of connecting to the stroller frame at the connector

■ ■ ■

[0021] An embodiment of an attachment 20 of the invention is shown in Figure 2. The attachment of Figure 2 is in an unlocked and folded configuration. The attachment 20 comprises a pair of attachment portions 21 capable of connecting to the stroller frame 12, two seat attachment elements 22 capable of supporting a seat; and a wheel 23. In this embodiment, the attachment portions are connected to the rear of the attachment 20 allowing the attachment 20 to be connected to the front of a stroller, such as stroller 10 shown in Figure 1. Other embodiments of the stroller attachment may include more than one wheel, one attachment element, one seat attachment element, or combinations of these elements, for example or may not include a wheel. In an embodiment of the stroller with one wheel, the connector portion may be on the forks of the front wheel, for example.

[0026] In Figure 3, the attachment 20 of Figure 2 is shown connected to the single stroller 10 of Figure 1 forming a double stroller. The double stroller configuration is shown with two stroller seats in an inline configuration, though the other configurations, such as a stroller seat and a bassinet or a pram may also be supported on the double stroller. Further, the seat attachment element of the attachment may be capable of supporting the front stroller seat in either a forward or backward position.

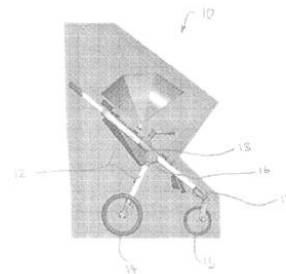


FIGURE 1

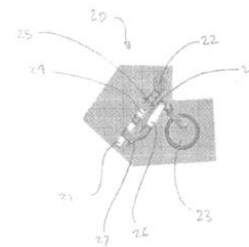


FIGURE 2

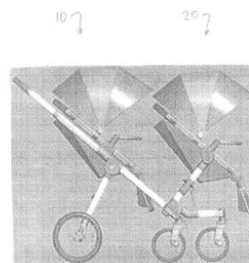
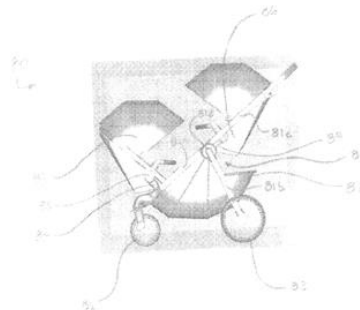


FIGURE 3

Ex. 1002, First Provisional, pgs. 36, 38, 40; Figs. 1-3

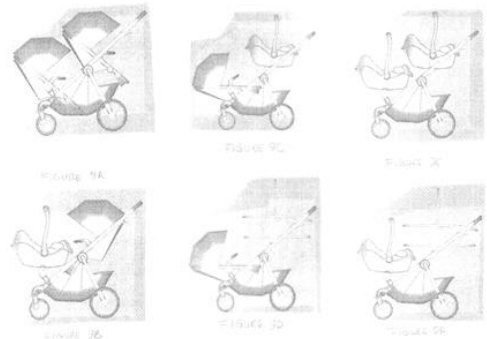
97. The second embodiment, which I reference as “Embodiment B,” for converting a single-seat stroller to a double-seat stroller is disclosed using Figures 8 and 9A-9H.

[0033] A further embodiment of the stroller 80 is shown in Figure 8. Stroller 80 may be easily converted from a single stroller comprising one seat to a double stroller comprising two seats without addition of another wheel on the attachment. Stroller 80 comprises a frame 81 capable of supporting the stroller seat 86. In this embodiment, the frame 81 comprises a front wheel support portion 81a, a back wheel support portion 81b, and a handle portion 81c. The frame 81 of the embodiment of the stroller 80 further comprises a folding mechanism 81d that connects front wheel support portion 81a, a back wheel support portion 81b, and a handle portion 81c. The folding mechanism 81d allows the stroller to be folded in a more compact size for storing or transportation. Figure 8A shows stroller 80 in a folded configuration.



■ ■ ■

[0036] Embodiment of the stroller 80 comprises a first seat attachment portion 84. The seat attachment portion 84 is connected to the stroller 80 front wheel support frame 81a. The seat attachment portion 84 is adjacent to the front wheel support portion 81a of frame 81. The seat attachment portion is capable of supporting a second seat in front of the stroller seat 86. This provides convenience and versatility to a user of stroller 80. Seat attachment portion may be fixedly attached or removably attached to front wheel support portion 81a. The front seat may be positioned substantially over the front wheels so the stroller remains stable. The seats should be positioned such that the center of gravity of the stroller is between the front and rear wheels. If not an additional wheel may be placed on the attachment as previously described. Seat attachment portion 84 comprises a seat connector 88. Seat connector 88 may be a multipurpose general connector that allows different seats to be interchanged on the seat attachment portion 84. Any style seat may be configured to connect to the seat connector, such as but not limited to, a stroller seat, a baby seat, a bassinet, a pram, a baby carrier, or a car seat, for example.



■ ■ ■

[0016] Figures 9A, 9B, 9C, 9D, 9E, and 9F show various configurations of the embodiments of the stroller shown in Figure 8.

Ex. 1002, First Provisional, pgs. 3, 42-43; Figs 8, 9A-9H

B. The First Non-Provisional

98. On December 4, 2009 continuation U.S. patent application No. 12/631,375 was filed. I understand this application published as U.S. Publication No. 2010/0140902. (Ex. 1003, “the First Non-Provisional”.)

99. The First Non-Provisional appears to have included the First Provisional’s disclosure of “Embodiment A.”

[0028] A side view of an embodiment a single stroller 10 is shown in FIG. 1. As a note, FIG. 1 shows only one side of the single stroller 10, however, most components include a complementary component on the other side of the single stroller but are not shown in FIG. 1. The single stroller 10 comprises a frame 12 that supports seat 13. The frame 12 may, optionally, include at least one, preferably two, folding mechanism 16 that allows the stroller 10 to be folded to a more convenient size for storing or transporting the stroller 10.

■ ■ ■

[0030] The embodiment of the stroller 10 comprises two attachment frame members 17. The connector portions are preferably on the front of the stroller to allow the seat attachment and the seat to be connected to the front of the stroller 10. The attachment frame members 17 allow a seat attachment such as the seat attachment for converting the single stroller 10 to a double stroller, as shown in FIG. 3, to be connected to the stroller. Only one seat attachment is shown in FIG. 3, the stroller 10 would use two seat attachments as shown in FIG. 3 or one seat attachment comprising two seat support elements. The embodiment of the stroller 10 has a left side and right side attachment frame members 17. An embodiment of a seat attachment of stroller 10 will comprise corresponding connector portions capable of connecting to the stroller frame at the attachment frame members 17. Though the seat attachment for the stroller is described in relation to a single stroller, the attachment may similarly be attached to a double stroller. Embodiments of the seat attachment may therefore be used to convert a double stroller into a triple stroller, if desired.

[0031] An embodiment of a seat attachment 20 of the invention is shown in FIG. 2. The seat attachment of FIG. 2 is in an unlocked and folded configuration. The seat attachment 20 comprises a pair of connector portions 21 capable of connecting to the attachment frame members 12, two seat attachment elements 22 capable of supporting a seat; and a wheel 23. In this embodiment, the connector portions are connected to the rear of the seat attachment 20 allowing the seat attachment 20 to be connected to the front of a stroller, such as stroller 10 shown in FIG. 1. Other embodiments of the seat attachment may include more than one wheel, one connector portion, one seat support element, or combinations of these elements. In an embodiment of the stroller with one wheel, the attachment frame member may be on the forks of the front wheel, for example.

■ ■ ■

[0036] In FIG. 3, the seat attachment 20 of FIG. 2 is shown connected to the single stroller 10 of FIG. 1 forming a double stroller. The double stroller configuration is shown with two stroller seats 13 in an inline configuration, though the other configurations, such as a stroller seat and a bassinet or a pram may also be supported on the double stroller. Further, the seat support element of the seat attachment may be capable of supporting the front stroller seat in either a forward or backward position.

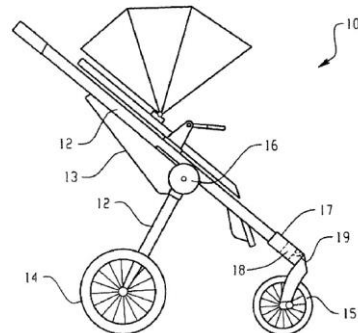


Fig. 1

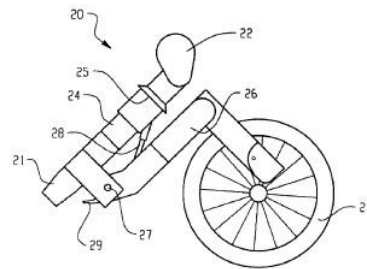


Fig. 2

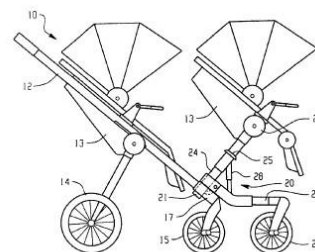
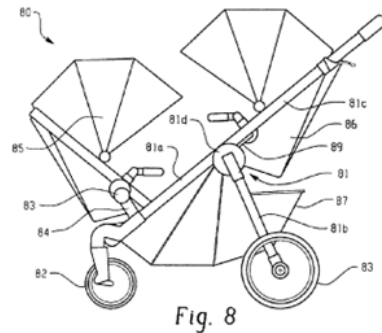


Fig. 3

Ex. 1003, First Non-Provisional, at ¶¶ 0028, 0030-0031, 0036, Figs. 1-3

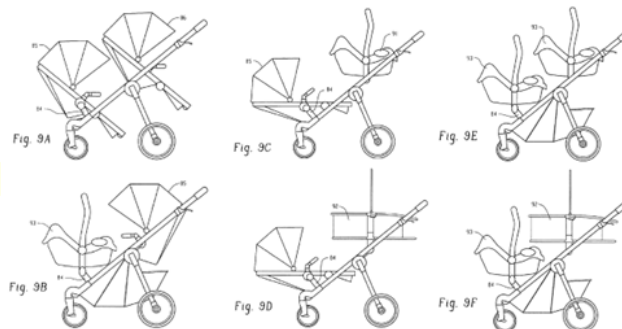
100. The First Non-Provisional also appears to have included the First Provisional's disclosure of "Embodiment B" related to Figures 8 and 9A-9H.

[0043] A further embodiment of the stroller 80 is shown in FIG. 8. Stroller 80 may be easily converted from a single stroller comprising one seat to a double stroller comprising two seats without addition of another wheel on the attachment. Stroller 80 comprises a frame 81 capable of supporting the stroller seat 86. In this embodiment, the frame 81 comprises a front wheel support portion 81a, a back wheel support portion 81b, and a handle portion 81c. The frame 81 of the embodiment of the stroller 80 further comprises a folding mechanism 81d that connects front wheel support portion 81a, a back wheel support portion 81b, and a handle portion 81c. The folding mechanism 81d allows the stroller to be folded in a more compact size for storing or transportation. FIG. 8A shows stroller 80 in a folded configuration.



[0046] Embodiment of the stroller 80 comprises a first seat support element 84. The seat support element 84 is connected to the stroller 80 front wheel support frame 81a. The seat support element 84 is adjacent to the front wheel support portion 81a of frame 81. The seat support element is capable of supporting a second stroller seat 85 in front of the stroller seat 86. This provides convenience and versatility to a user of stroller 80. Seat support element may be fixedly attached or removably attached to front wheel support portion 81a. The front seat 85 may be positioned substantially over the front wheels so the stroller remains stable. Preferably, the seats should be positioned such that the center of gravity of the stroller is between the front and rear wheels. If not an additional wheel may be placed on the attachment as previously described. Seat support element 84 comprises a seat connector 88. Seat connector 88 may be a multipurpose general connector that allows different seats to be interchanged on the seat support element 84. Any style seat may be configured to connect to the seat connector, such as but not limited to, a stroller seat, a baby seat, a bassinet, a pram, a baby carrier, or a car seat, for example.

[0026] FIGS. 9A, 9B, 9C, 9D, 9E, and 9F show various configurations of the embodiments of the stroller shown in FIG. 8.



Ex. 1003, First Non-Provisional, at ¶¶ 0026, 0043, 0046, Figs. 8, 9A-9H

101. On March 28, 2013, while prosecution of the First Non-Provisional was ongoing, the Examiner indicated a figure was needed to illustrate how “Embodiment A” (i.e., Figures 1-3) discloses “one attachment portion” being attached to one front wheel and “the other attachment portion” being attached to the other front wheel.

8. The drawings are objected to under 37 CFR 1.83(a). The drawings must show every feature of the invention specified in the claims. Therefore, the following from Claim 16 must be shown or the feature(s) canceled from the claim(s): "wherein one attachment portion is connected adjacent to one front wheel and the other attachment portion is connected to the frame adjacent to the other front wheel." No new matter should be entered.

Corrected drawing sheets in compliance with 37 CFR 1.121(d) are required in reply to the Office action to avoid abandonment of the application. Any amended replacement drawing sheet should include all of the figures appearing on the immediate prior version of the sheet, even if only one figure is being amended. The figure or figure number of an amended drawing should not be labeled as "amended." If a drawing figure is to be canceled, the appropriate figure must be removed from the replacement sheet, and where necessary, the remaining figures must be renumbered and appropriate changes made to the brief description of the several views of the drawings for consistency. Additional replacement sheets may be necessary to show the renumbering of the remaining figures. Each drawing sheet submitted after the filing date of an application must be labeled in the top margin as either "Replacement Sheet" or "New Sheet" pursuant to 37 CFR 1.121(d). If the changes are not accepted by the examiner, the applicant will be notified and informed of any required corrective action in the next Office action. The objection to the drawings will not be held in abeyance.

Ex. 1014, File History of First Non-Provisional, pgs. 183-184

102. On June 12, 2013, the Patent Owner responded by attempting to amend the specification to include Figures 10 and Figure 11 (shown below). The Patent Owner also attempted to amend the specification to include the following description for both Figures 10 and 11.

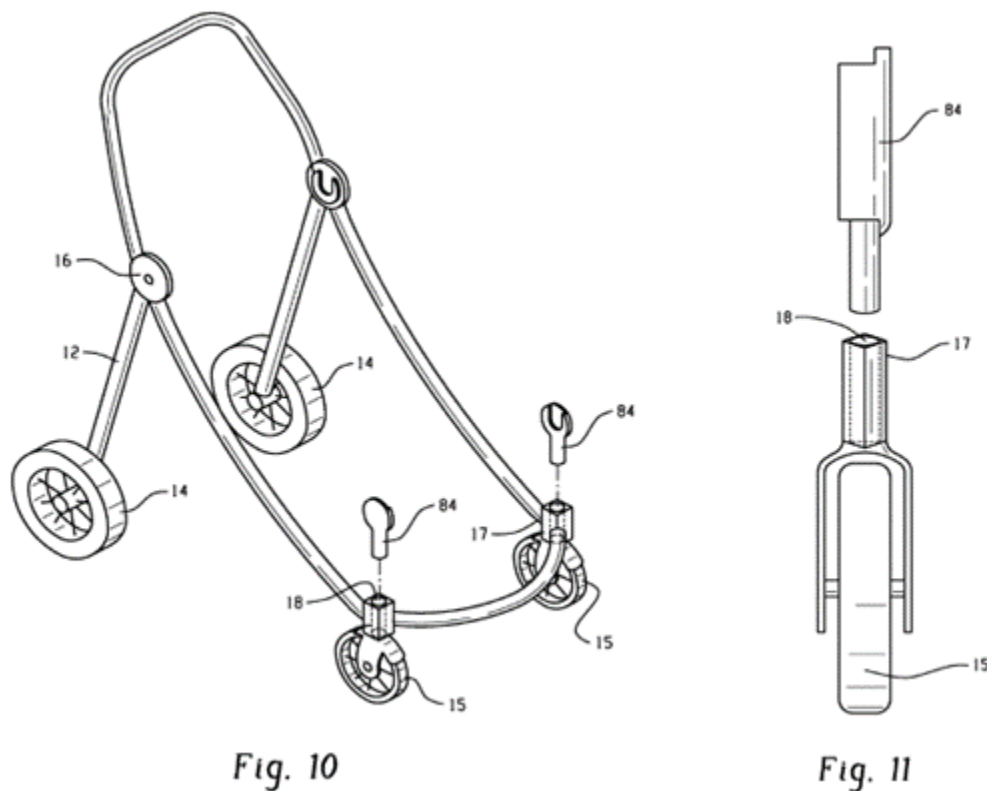
AMENDMENT TO THE SPECIFICATION

Please add the following paragraphs to the specification after paragraph [0026]:

“FIG. 10 shows a perspective view of an embodiment of a stroller comprising two attachment frame members 17 capable of reversibly receiving two separate seat attachments 20 84, wherein the seat attachments each comprise a seat attachment member 22 for converting the stroller into a double stroller, the seat attachment comprising a connector portion capable of reversibly connecting to one of the attachment portions above a front wheel of the stroller and a seat attachment member capable of supporting a second seat in either a forward or backward position;

FIG. 11 shows a close up on the stroller, stroller front wheel, attachment portion 17 of the stroller adjacent to the front wheel comprising slot 18 and the seat attachment 84.”

Ex. 1014, File History of First Non-Provisional, pg. 221



Ex. 1014, File History of First Non-Provisional, pgs. 233-234

103. On August 2, 2013, the Examiner objected stating Figures 10-11 do not appear to be directed to the embodiment disclosed by Figures 1-3. The Examiner

instead indicated Figures 10-11 appear to be directed to “a different embodiment and do not contain the same elements as claimed[.]”

7. The new drawings submitted 6/12/2013 labeled Figures 10 and 11 (along with the previously submitted Figures 1-3) are objected to as failing to comply with 37 CFR 1.84(p)(4). Specifically, it is unclear whether the new Figures are the requested “frontal view” showing “how the seat attachment and stroller mate” pertaining to the elected embodiment in Figures 1-3. As best understood, the new figures appear to be directed to a different embodiment and do not contain the same elements as claimed nor do they illustrate “how the seat attachment and stroller mate.” Furthermore, they do not contain the seat attachment or its extra wheel as claimed (See, e.g., Claims 2 and 16). Claim 16, as currently claimed, provides for a stroller with at least three wheels in the front which the drawings do not currently illustrate. Corrected drawing sheets in compliance with 37 CFR 1.121(d) are required in reply to the Office action to avoid abandonment of the application. Any amended replacement drawing sheet should include all of the figures appearing on the immediate prior version of the sheet, even if only one figure is being amended. Each drawing sheet submitted after the filing date of an application must be labeled in the top margin as either “Replacement Sheet” or “New Sheet” pursuant to 37 CFR 1.121(d). If the changes are not accepted by the examiner, the applicant will be notified and informed of any required corrective action in the next Office action. The objection to the drawings will not be held in abeyance.

Ex. 1014, File History of First Non-Provisional, pgs. 277-278

104. It does not appear this objection was ever addressed and the Patent Owner ultimately elected to abandon the First Non-Provisional. (Ex. 1014, File History of First Non-Provisional, pgs. 519-521).

 Applicant hereby expressly abandons the instant application (any attorney/agent signing for this reason must have power of attorney pursuant to 37 CFR 1.32(b)).

Ex. 1014, File History of First Non-Provisional, pg. 521

C. The '869 Patent

105. On Apr. 25, 2014, just before the First Non-Provisional was abandoned, Patent Owner filed U.S. patent application No. 14/261,558 which issued as U.S. Pat. No. 8,955,869 (Ex. 1004, “the ’869 Patent”). I understand the ’869 Patent claims priority to the First Provisional.

106. As filed, the ’869 Patent appears to include the disclosure regarding “Embodiment A” (*see* Ex. 1004, the ’869 Patent, 4:40-48, 5:11-44, 7:5-13) and “Embodiment B” (*see* Ex. 1004, the ’869 Patent, 8:49-63, 9:36-56, 3:66-67).

107. But when filed, the Patent Owner elected to included Figures 10-11. As I explained above, these figures had been objected to by the Examiner during prosecution of the First Non-Provisional on June 12, 2013.

108. When added to the ’869 Patent, Figures 10-11 included only the following description.

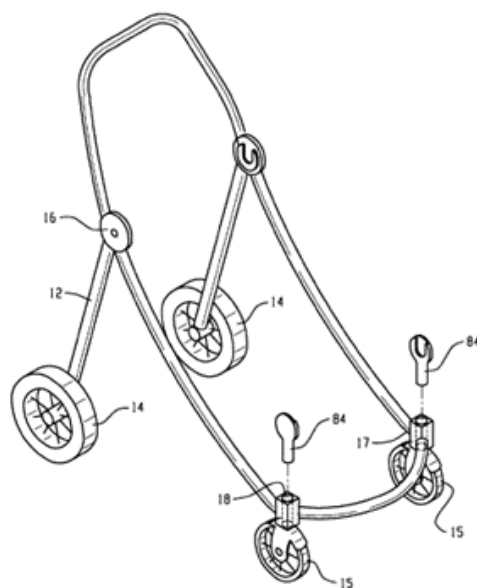


Fig. 10

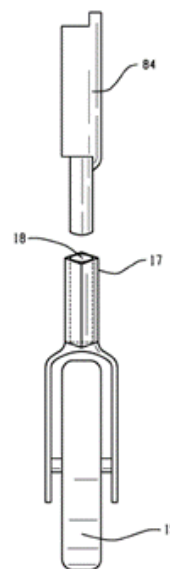


Fig. 11

FIG. 10 shows a stroller with left and right attachment frame members for attaching a second seat; and
FIG. 11 shows an attachment frame member with a cylindrical post to be received in a slot in a stroller frame.

Ex. 1004, the '869 Patent, 4:1-4, Figs. 10-11

109. As I explained above, I understand the Examiner objected to these two drawings when introduced as not being representative of the embodiment shown by Figures 1-3, *i.e.*, “Embodiment A.” (Ex. 1014, First Non-Provisional File History, pgs. 277-278.)

VI. Overview of the '869 Patent

110. The '869 Patent discloses a stroller. (EX. 1004, '869 Patent.) The stroller (10) is a standard stroller with a frame (12) that supports a seat (13), and which may include two folding mechanisms (16) for folding the frame. (EX 1004, '869 Patent, col. 4:40-48.) The seat (13) may be removable. (*Id.*, col. 4:49-51.) The

stroller (10) has a pair of front wheels (15) and a pair of rear wheels (14). (*Id.*, col. 4:49-66.) The back wheels do not pivot, the front wheels do. (*Id.*) These features were all common on prior art strollers.

111. The stroller also includes two attachment frame members (17) (called attachment portions in the specification) on either side. (*Id.*, col. 5:11-29.) The attachment frame members (17) contains slots (18) for receiving connector portions of a seat attachment. (*Id.*)

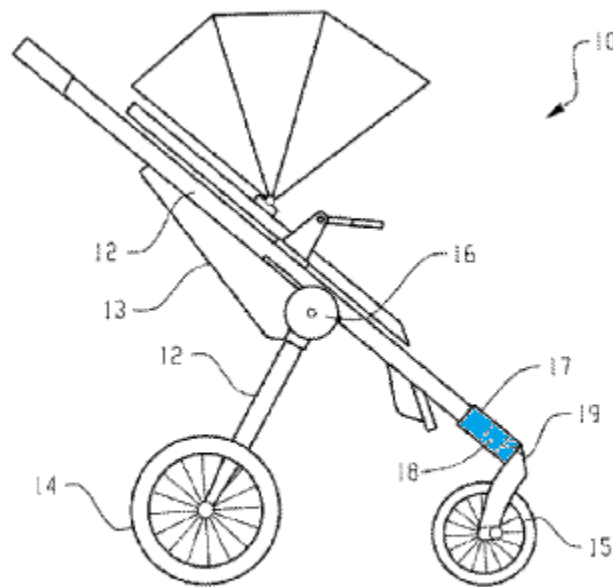


Fig. 1

112. The '869 Patent discloses a seat attachment (20) for the stroller. (*Id.*, FIG. 2.)

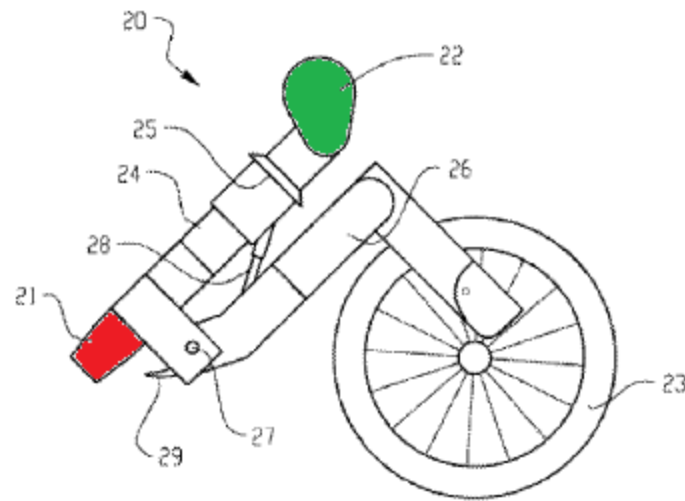


Fig. 2

113. The seat attachment (20) plugs into the attachment frame members (17) of the stroller (10), as shown in FIG. 3.

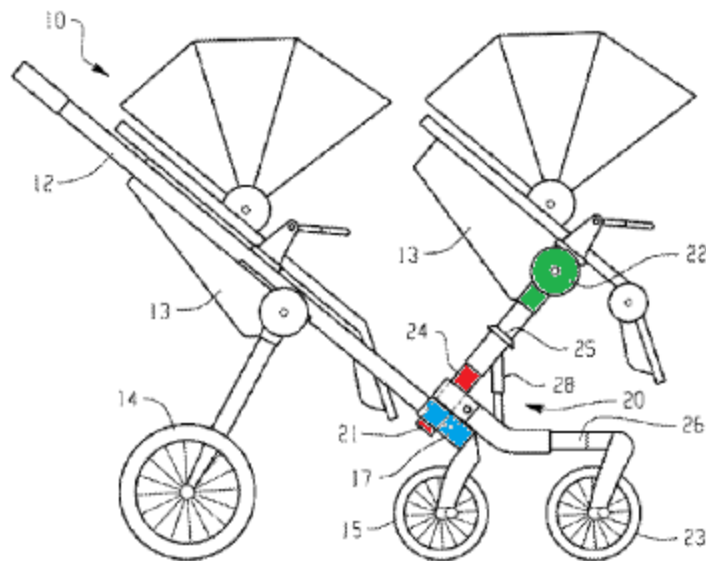
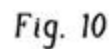


Fig. 3

114. The seat attachment (20) includes connector portions (21) that fit within the slots (18) of the attachment frame member (17). In other words, the connector

portions (21) connect the seat attachment (20) to the stroller (10). The seat attachment (20) also includes seat support elements (22) (sometimes called seat attachment elements in the Specification) to which a seat can removably attach in a front- or backwards-facing position. (*Id.*, col. 5:30-67, col. 6:1-53 (describing FIG. 2).) There are two connector portions and two seat support elements, one on the left and one on the right side of the stroller, as the stroller (10) is symmetrical. (*Id.*)

115. An embodiment of the seat attachment (20) is shown in FIG. 10. (*Id.*, col. 4:1-2 (the only instance of “FIG. 10” in the specification).) Seat support portion (84) is similar to the seat attachment (20) of FIG. 2. (*Id.*, col. 8:63-67, col. 9:1-13 (“seat support portion 84 may be similar to seat support portion 20 shown in FIG. 2, without the wheel 23, the strut 28, pivotal connection 27, and/or wheel support frame 26”).)



A. ‘869 Patent File History

UPPABABY ET AL. EX. 1001

13. (New) A seat attachment for a stroller, comprising:
a separate left attachment portion, wherein the left attachment portion comprises:
a connector portion capable of removably connecting to a stroller frame
adjacent a left front wheel of the stroller and a left seat support element
removably connecting a seat in either a forward or backward position; and
a separate right attachment portion, wherein the right attachment portion
comprises:
a connector portion capable of removably connecting to a stroller frame
adjacent a right front wheel of the stroller and a right seat support element
removably connecting the seat in either a forward or backward position between
the left and right support elements.

118. The Examiner never issued a rejection, and the Examiner's substantive analysis was limited. As a result, none of the references used herein were cited by the Examiner.

VII. Claim Construction

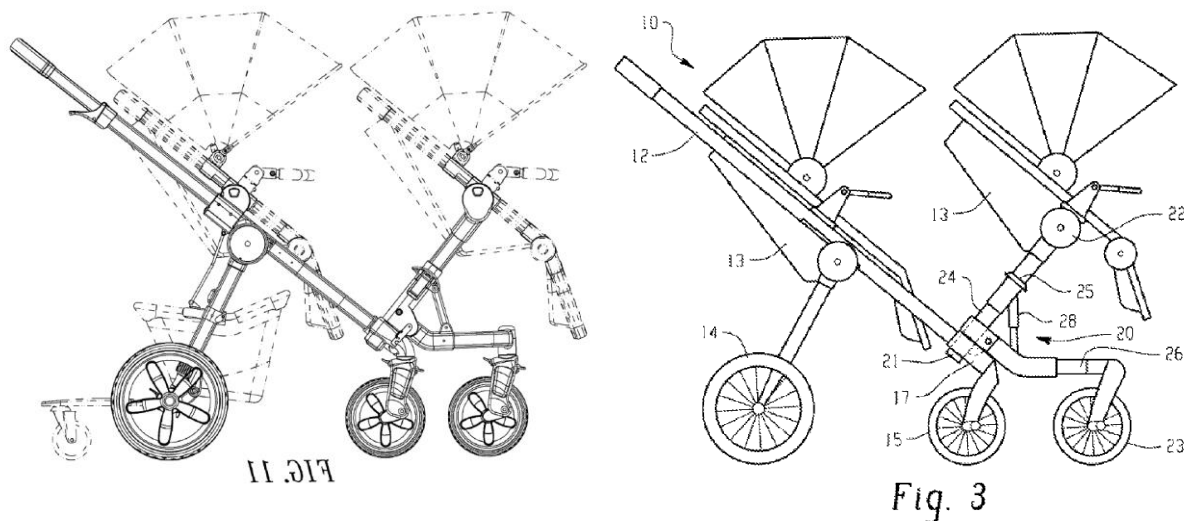
119. In preparing this opinion, I have afforded the claims their plain and ordinary meaning except for those terms which are disputed in the co-pending litigation with UPPAbaby. For the disputed terms, counsel has requested that I apply the definition proffered by Baby Jogger in the litigation.

VIII. Overview of the prior art

A. U.S. Design Patent No. D593,459 to Liao

120. On September 5, 2008, Unique Product & Design Co. Ltd. ("UPD") filed an application for U.S. Design Patent D593,459, titled "A Combination Pushchair Frame," to Gordon Liao (app. no. 29/324,044) ("Liao"). (EX. 1066, Liao,

52-53.) Liao discloses each and every element of the '869 Patent. In fact, a comparison of FIG. 11 (mirrored) (left) of Liao and FIG. 3 (right) of the '869 Patent is striking:



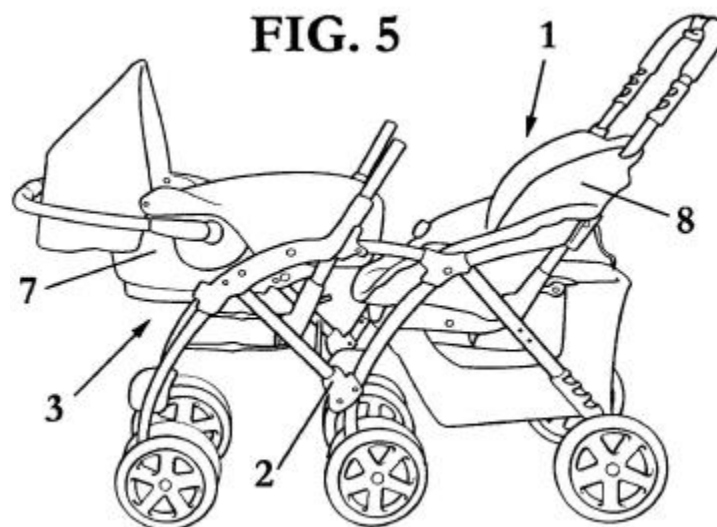
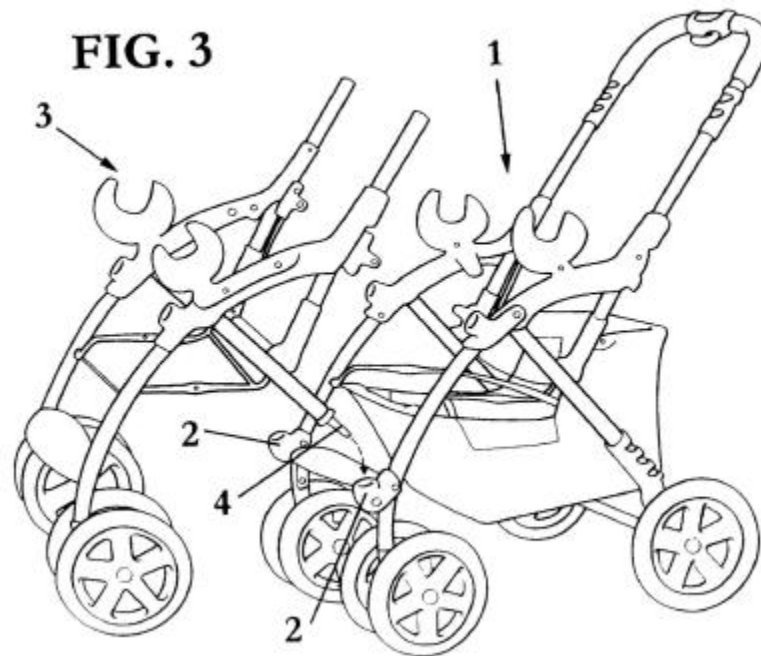
121. The Patent Office has relied on the Liao patent to repeatedly reject proposed claims in patents in the family of the instant '869 Patent. For example, during the prosecution of U.S. Pat. App. 16/832,429 (U.S. Pat. 11,192,568), the Office asserted Liao as part of an obviousness rejection. (EX. 1019, '568 Patent File History, 563-64.)

122. In the prosecution of U.S. Patent 12,275,449, ultimately a Continuation-in-Part of the application underlying the '869 Patent, the Examiner found that Liao disclosed a convertible single-to-double stroller, and found that the stroller of Liao contained a folding mechanism, all of the standard frame elements claimed by Baby Jogger, e.g., front and rear support frames, handles, and so forth,

and at least one front wheel, two rear wheels, a first seat removably attached to the stroller frame, one or more seat attachment portions removably attached to the stroller frame, a second seat removably attached to the one or more seat attachment portions, and so forth. The Examiner found that at least one of the first and second seats was configured to face forward or backward, and that the center of gravity of the stroller was between the front and rear wheels. (EX. 1068, '449 Patent File History, 950-53.) The Examiner also found the subject matter of each of the dependent claims to be disclosed, including the first (rear) seat being closer to the handles, and the second (front) seat being closer to the front wheels, the presence of seat connectors (equivalent to the seat support elements of the instant patent), the seat attachment portions, and so forth. (*Id.*) This makes it even clearer that Liao anticipates and renders obvious the claims of the '869 Patent.

B. Spanish Patent ES 2253093 to Stopp

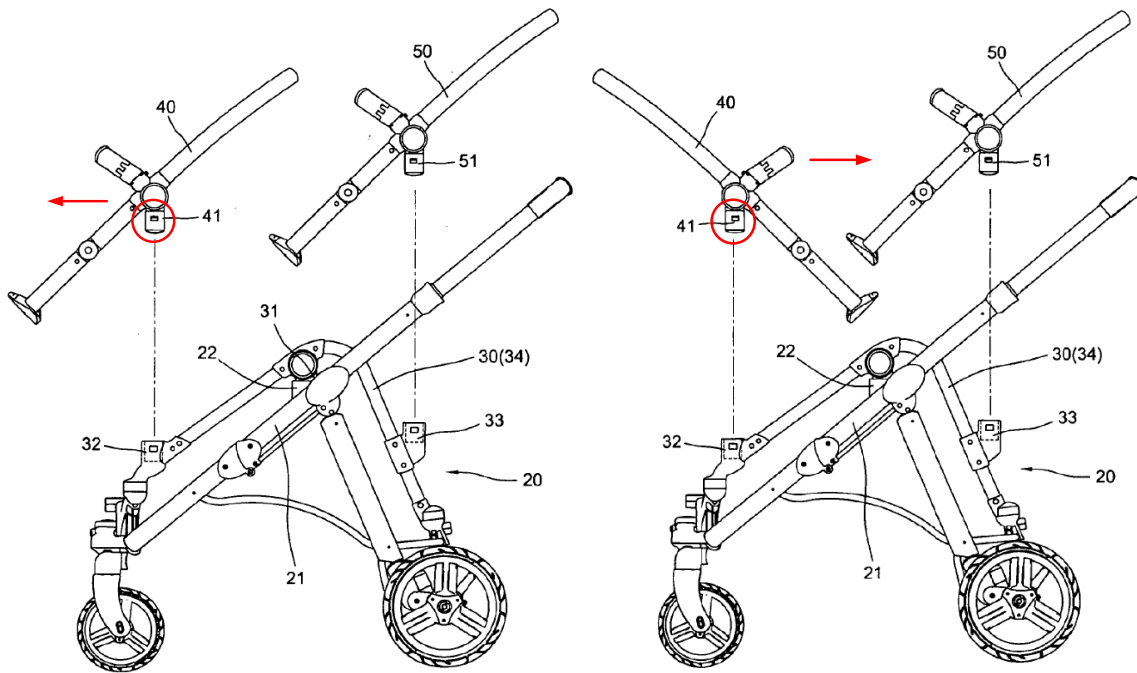
123. Stopp discloses a single stroller that can be converted into a double stroller. (EX. 1063, Stopp, col. 1:26-50.) As shown in FIG. 3, the stroller (1) in Stopp has forward-positioned sockets (2) that can receive rods (4) to secure the extra seat attachment (3) to the stroller. (*Id.*, col. 2:11-19.) Seats can then be mounted on either stroller, as shown in FIG. 5. Stopp anticipates and/or renders obvious many of the claims of the '869 Patent.



C. U.S. Patent Pub. No. 2010/0013281 to Chen

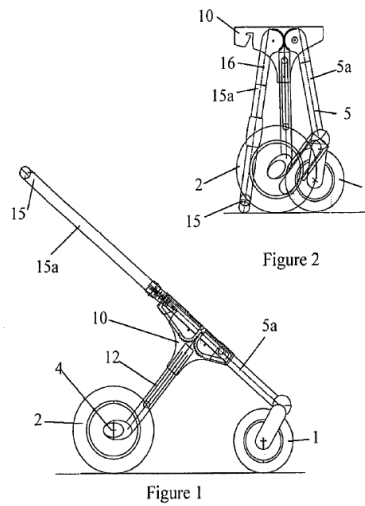
124. Chen discloses a single-seat stroller with an auxiliary frame that plugs into a seat connection of the stroller and which can then support two seats, as shown

in FIGS. 5 and 11. (EX. 1065, Chen, ¶¶ 21, 22.) Chen discloses inserts (41, 51) and receptacles (32, 33) that support seats being connected facing forward or backward. (*Id.* ¶¶ 6, 24, 26.)



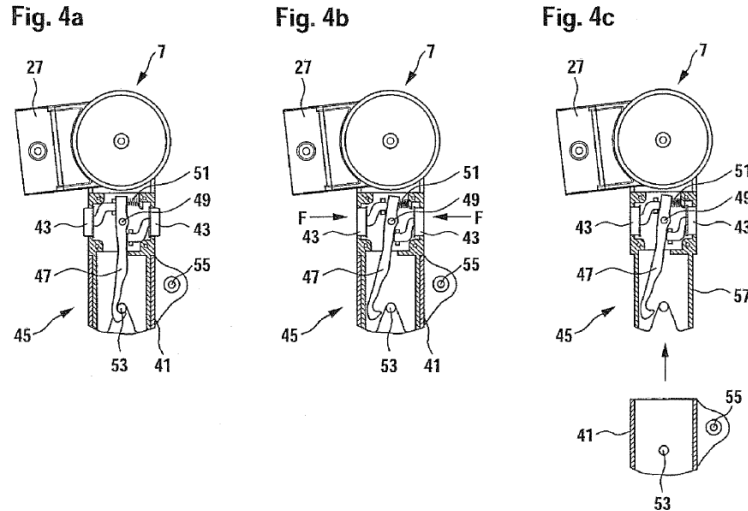
D. U.S. Patent Pub. No. 2006/0082104 to Wun

125. Wun discloses a folding mechanism for a stroller. (EX1060 ¶¶ 3, 35-39.)



E. U.S. Patent Pub. No. 2008/0150247 to Lake

126. Lake discloses a locking mechanism but a button and hook/latch system for securing a seat to a stroller. (EX1061 ¶¶ 44, 46-51.)



IX. GROUND 1 — LIAO

Liao renders obvious claims 1-30.

A. Independent Claims 1 & 24

	Claim 1	Claim 24
(Pre)	A seat attachment for a stroller, comprising:	A seat attachment for a stroller, comprising:

127. Figures 1, 5 & 11 of Liao illustrate a seat attachment for a stroller. (EX1048, FIGS. 1, 5, 11.) Figures 8-13 show removable seats attached to the seat attachment. (*Id.*, FIGS. 8-13.) As a result, Liao discloses the preamble of claims 1 and 24.

128. Furthermore, when filing his application, Liao also included a specification that described his invention as a combination pushchair frame:

I, Gordon Liao, have invented a new, original and ornamental design for a combination pushchair frame of which the following is a specification, reference being had to the accompanying drawings, forming a part hereof...

(EX. 1066, ‘459 Patent File History, 34-35 (emphasis added).) Liao went on to describe the pushchair as a combination pushchair in his discussion of FIGS. 1 and 8-13, and indirectly with respect to FIGS. 2-7 (via reference back to the first figure). (*Id.*) In short, Mr. Liao understood that his stroller was a combination of two separate components.

129. Accordingly, a POSITA would understand that Liao discloses a seat

attachment for a stroller.

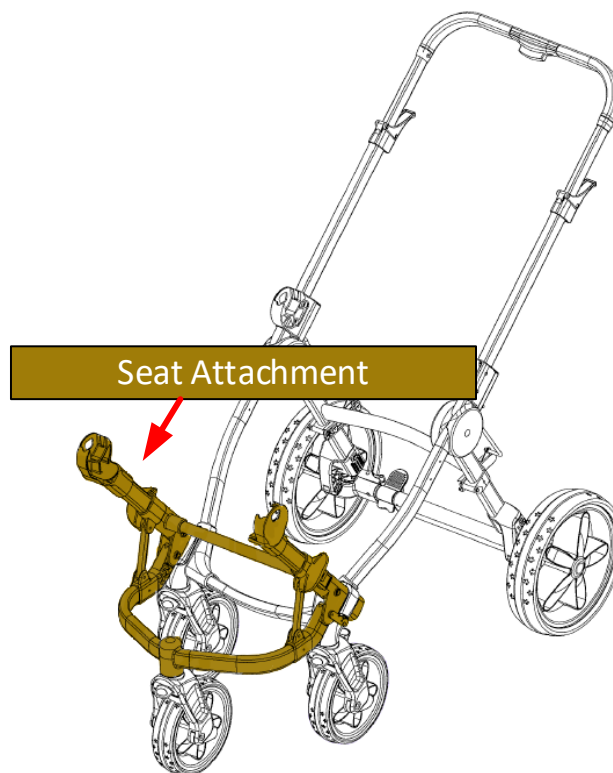


FIG. 1

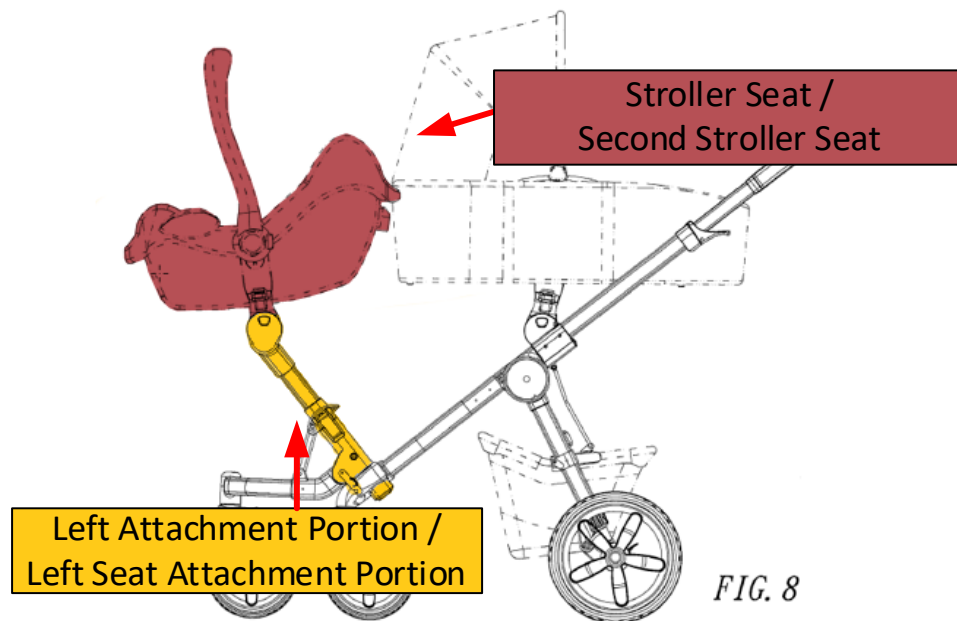
130. Accordingly, Liao discloses limitations [1(Pre)] and [24(Pre)].

(a)	a separate left attachment portion, wherein the left attachment portion comprises:	a left seat attachment portion, wherein the left seat attachment portion comprises:
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131. As shown in Figures 1 and 5, Liao's seat attachment includes left and right attachment portions. (EX1048, FIGS. 1, 5.) The left attachment portion is separate from the right attachment portion, as shown below. (EX1048, FIG. 1.)

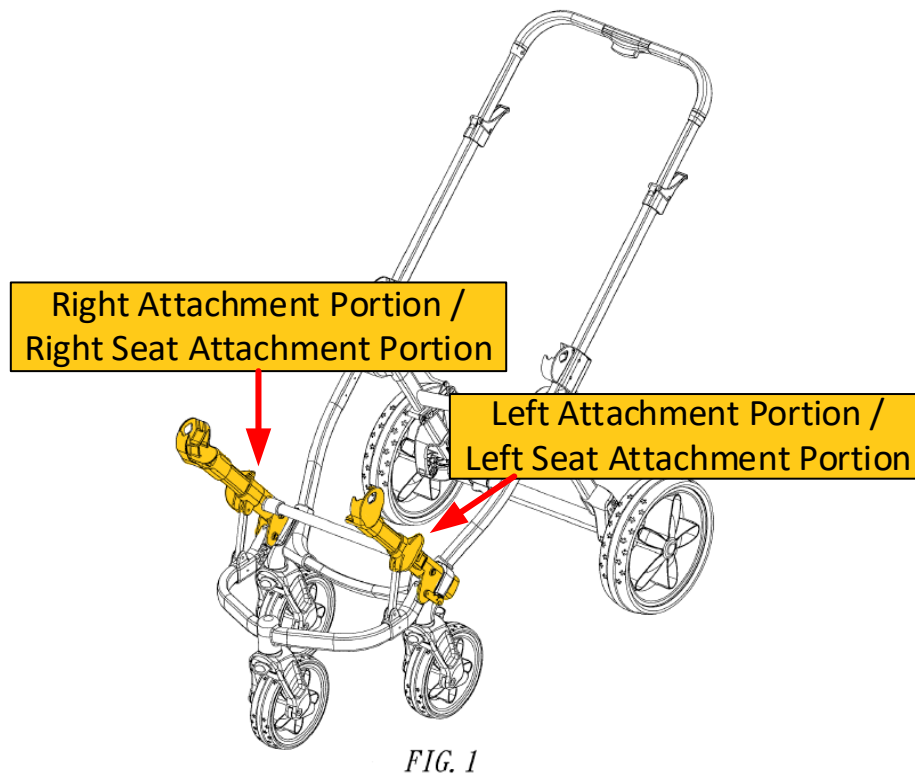
132. Additionally, because Liao's left/right attachment portions connect to and support a stroller seat, each attachment portion also constitutes a "seat

attachment portion,” as recited in limitation [24(a)]. (EX1048, FIG. 8.)



133. As shown in FIG. 1, Liao discloses separate left and right attachment portions, where the left and right attachment portions are the left and right sides of the seat attachment. As the attachment portions are separate, Liao also discloses the language of claim 24 which lacks the “separate” modifier but is otherwise identical to claim 1. (EX. 1048, Liao, FIG. 1.)

134. Accordingly, Liao discloses [1(a)] and [24(a)].



(b)	a connector portion capable of removably connecting to a stroller frame adjacent a left front wheel of the stroller and a left seat support element removably connecting a seat in either a forward or backward position; and	a connector portion capable of removably connecting to a stroller frame adjacent a left front wheel and a left seat support element removably connecting a seat in either a forward or backward position; and
-----	--	---

135. Each (seat) attachment portion of Liao's seat attachment includes a connector portion, labeled below. (EX1048, FIG. 1, 4, 5, 11.) The left connector portion connects to the stroller frame adjacent the left front wheel of the stroller. (EX1048, FIG. 1, 4, 5, 11.)

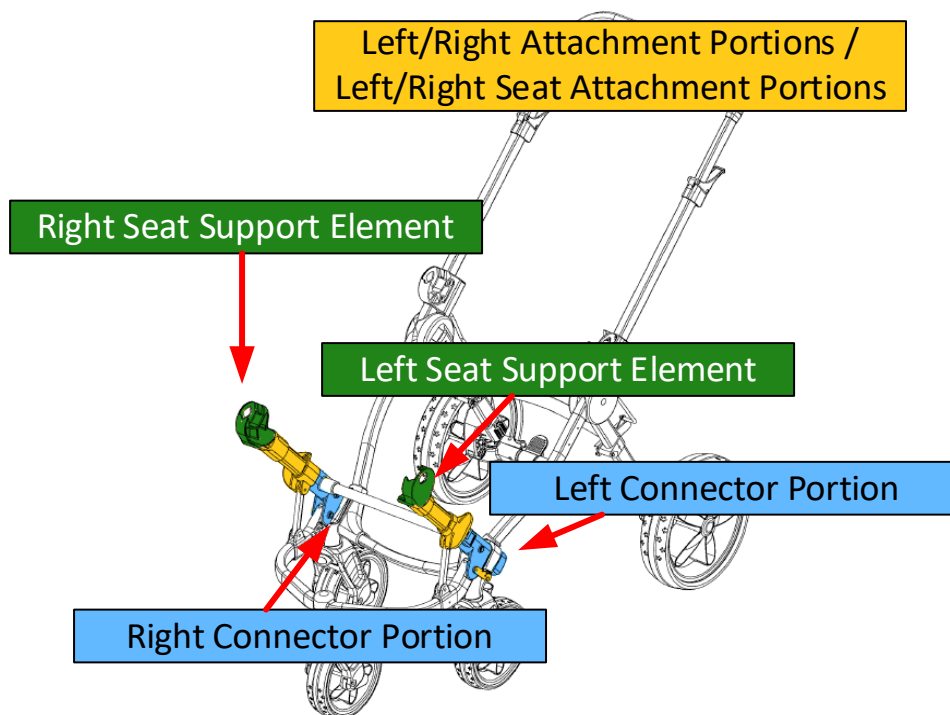


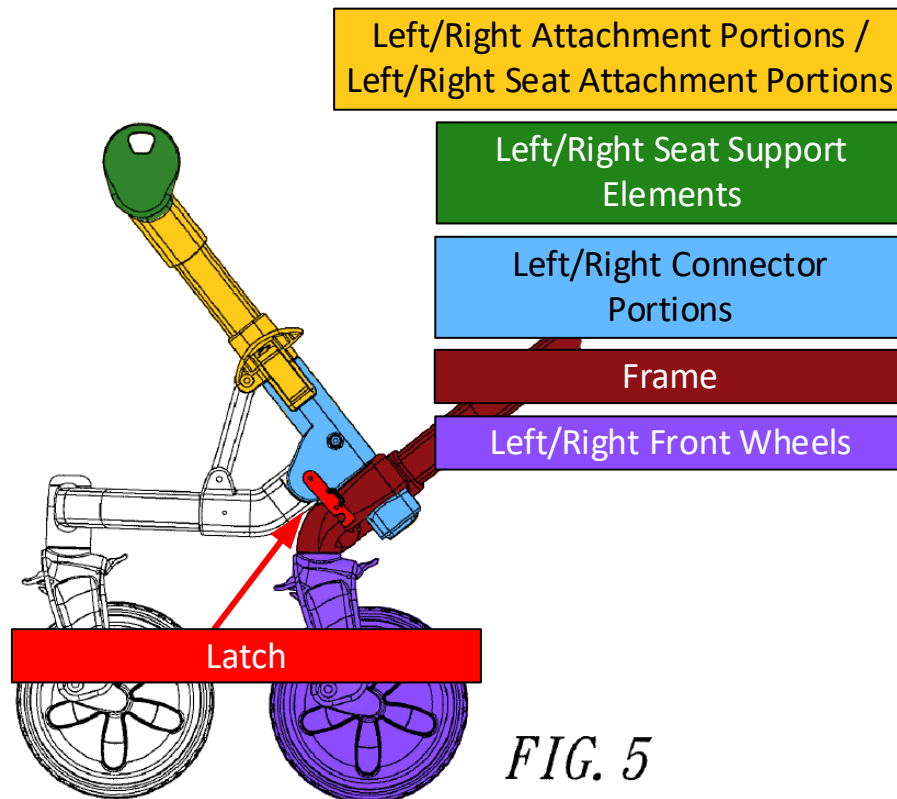
FIG. 1

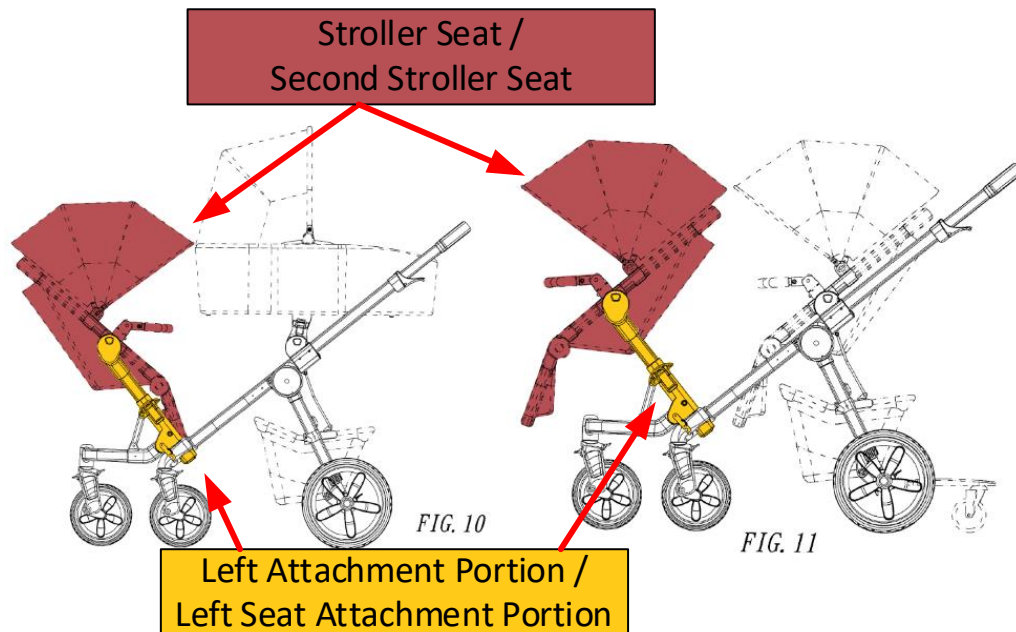
136. Each connector portion is associated with a latch, shown below. (EX1048, FIG. 5.) The latch is a mechanism that allows the connector portion to be easily connected to and removed from the stroller frame. A latch would not be present if the connector portion was permanently connected to the stroller frame. Therefore, Liao discloses that the connector portion is capable of removably connecting to the stroller frame adjacent the left front wheel.

137. As shown in FIG. 1 of Liao, the connector portion is the (blue) element that plugs into the frame of the stroller above and adjacent to the wheels of the stroller. The left connector portion (blue) is the connector portion on the left side. (EX. 1048, Liao, FIG. 1.)

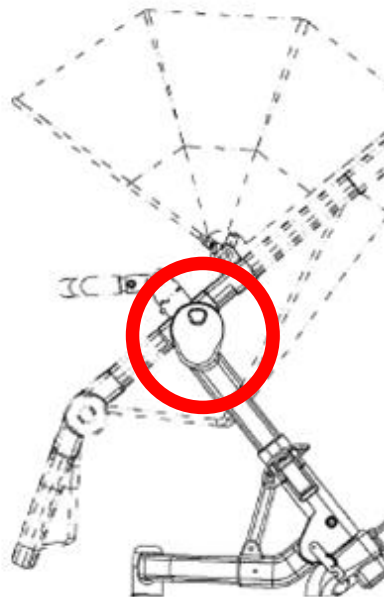
138. Liao's attachment portions also include seat support elements, labeled below. (EX1048, FIG. 1.)

139. The seat support elements removably connect seats in either a forward or backward position, as shown in FIGS. 10-11. (EX1048, FIGS. 10, 11.)

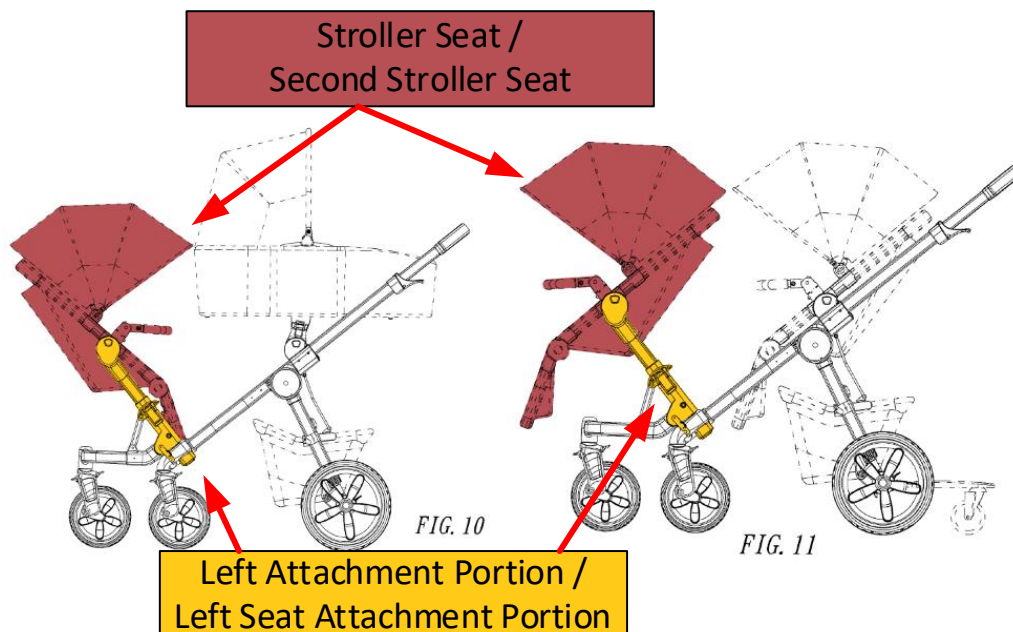




140. Liao's figures show different types of seats being connected to the seat support elements, which a POSITA would have understood to mean that the seats are removable and that various types of seats can be used with the frame at various times. (EX1048, FIGS. 8-13.) Additionally, a POSITA would have recognized that the coupling mechanism between the seat and the seat support elements is a conventional connector designed to allow the seat to be easily removed and connected. (EX1048, FIG. 11.)



141. Liao's seat support elements also connect a seat in either a forward or backward position, as shown in FIGS. 10-11 below. (EX1048, FIGS. 10-11.)



142. Therefore, Liao discloses seat support elements removably connecting a seat in either a forward or backward position.

143. With respect to both connector portions (blue), it is clear from visual inspection and from Liao's discussion of a "combination" pushchair that the seat attachment is removable from the frame and that the connector portions (blue) are the elements that facilitate connection to the frame. (EX. 1048, FIGS. 1, 5.) Not only can a slot be seen through which the connector portions pass (as in FIG. 1), but the presence of the latch, clearly visible in FIGS. 4 and 5, shows that the seat attachment is meant to be secured to the frame when in use, and unlatched from the frame when removed. (*Id.*, FIGS. 1, 4, 5.) There would be no reason to include the latch if the seat attachment were not removable (e.g., if the seat attachment were monolithically formed as part of the frame). (*Id.*)

144. Liao also discloses a seat support element, as shown in FIG. 1. (EX. 1048, FIG. 1.) The seat support elements removably connect seats in either a forward or backward position, as shown in FIGS. 10-11. (EX. 1048, FIGS. 10-11.)

145. Furthermore, a reversible seat feature would have been obvious. Liao discloses seat support elements supporting various types of forward-facing seats and rear-facing seats. (EX1048, FIGS. 8-13.). A POSITA would have understood that having a stroller seat capable of facing either a forward or backward position was common and desirable because it allows a child to face rearward and see the caregiver pushing the stroller (so the caregiver and child can see each other) or face forward and see the scene in front of the stroller. Additionally, a POSITA would

have known that a removable seat was beneficial because it allows the stroller to be more easily transported and stored when the seats are removed from the frame, and it allows different types of seats to be used with the same stroller frame. A POSITA would have reasonably expected success because the modifications would have been simple, used conventional design components, and was well-within the skill of a POSITA.

146. If PO argues that Liao fails to disclose seat support elements removably connecting a seat in either a forward or backward position, such a feature would have been obvious. Liao discloses seat support elements supporting various types of forward-facing seats and rear-facing seats. (EX1048, FIGS. 8-13.). A POSITA would have understood that having a stroller seat capable of facing either a forward or backward position was common and desirable because it allows a child to face rearward and see the caregiver pushing the stroller (so the caregiver and child can see each other) or face forward and see the scene in front of the stroller. Additionally, a POSITA would have known that a removable seat was beneficial because it allows the stroller to be more easily transported and stored when the seats are removed from the frame, and it allows different types of seats to be used with the same stroller frame. A POSITA would have reasonably expected success because the modifications would have been simple, used conventional design components, and was well-within the skill of a POSITA.

147. Therefore, Liao discloses [1(b)]/[24(b)] or, alternatively, renders it obvious.

(c)	a separate right attachment portion, wherein the right attachment portion comprises:	a right seat attachment portion, wherein the right seat attachment portion comprises:
(d)	a connector portion capable of removably connecting to a stroller frame adjacent a right front wheel of the stroller and a right seat support element removably connecting the seat in either a forward or backward position between the left and right support elements.	a connector portion capable of removably connecting to the stroller frame adjacent a right front wheel and a right seat support element removably connecting the seat in either a forward or backward position between the left and right seat support elements.

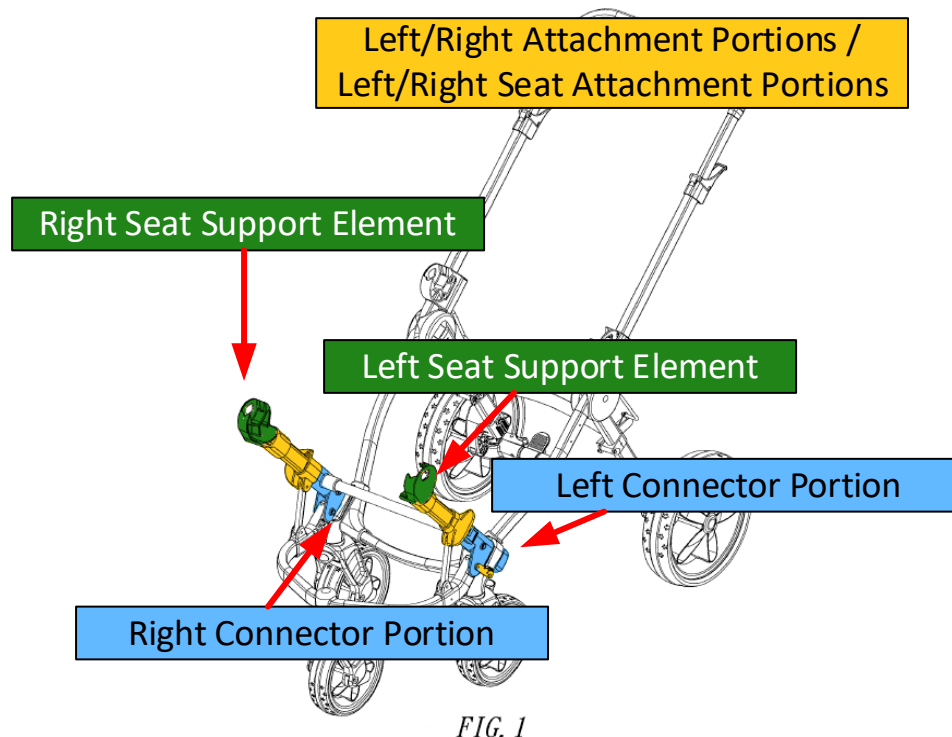
148. Liao's stroller system has left-right symmetry. (EX1048, FIGS. 1-7.)

As shown in the figures below, the right side of Liao's seat attachment mirrors all the features discussed above that the left side possesses. (*Id.*) Therefore, Liao discloses or, alternatively, renders obvious the right-sided features recited in [1(c)-(d)]/[24(c)-(d)], for the same reasons discussed above. (*Id.*)

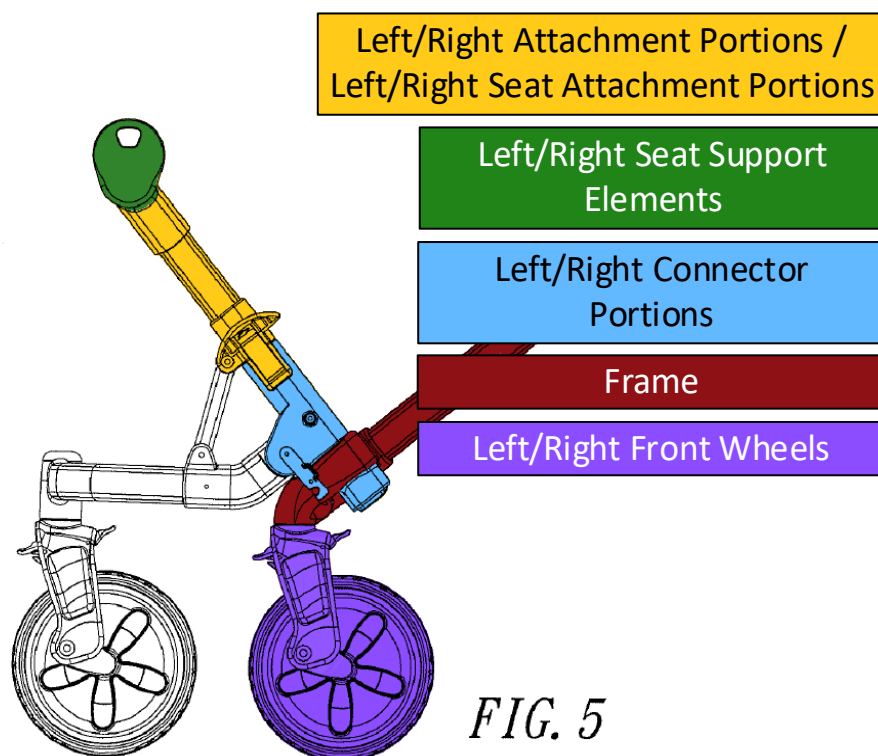
149. Liao discloses a separate right attachment portion (and therefore a right attachment portion), wherein the right seat attachment portions comprises a connector portion capable of removably connecting to a stroller frame adjacent a right front wheel of the stroller (and therefore adjacent a right front wheels), and a right seat support element removably connecting the seat in either a forward or backward position between the left and right support elements. (*Id.*, FIG. 1.)

150. Liao's stroller system has left-right symmetry. (EX1048, FIGS. 1-7.) As shown in the figures below, the right side of Liao's seat attachment mirrors all the features discussed above that the left side possesses. (*Id.*) Therefore, Liao discloses or, alternatively, renders obvious the right-sided features recited in [1(c)-(d)]/[24(c)-(d)], for the same reasons discussed above with respect to the earlier elements of claim 1.

151. Additionally, as shown in FIGS. 8-13, the seat is between the left and right seat support elements. It is further clear from visual inspection that the figures of Liao that a seat placed on the seat support elements (green) would extend between the seat support elements because such a seat is supported by both seat support elements. (*Id.*)



(EX1048, FIG. 1.)



152. Additionally, as shown in FIGS. 8-13, the seat is between the left and right seat support elements. (*Id.*, FIGS. 8-13.)

153. Therefore, Liao discloses limitations [1(c)-(d)]/[24(c)-(d)] or, alternatively, renders them obvious.

154. My understanding of Liao is confirmed by the corresponding Taiwanese design patent, (EX. 1052, UPD, emphasis added), which discloses:

The baby stroller frame of the present invention is composed of a **main frame** and **a sub-frame**, the main frame is slightly herringboned at the rear, a circular articulation is provided between the middle of the main frame and the rear wheel stand for unfolding and folding; **the sub-frame is located at the front and somewhat L-shaped, the front end thereof is provided with an**

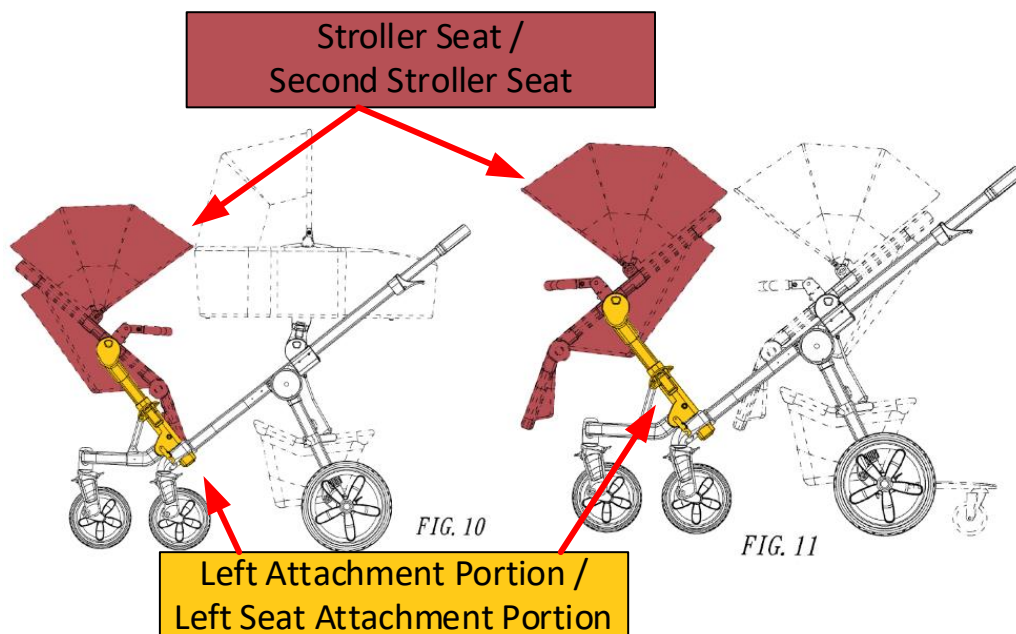
auxiliary wheel such that the present invention is five-wheeled.

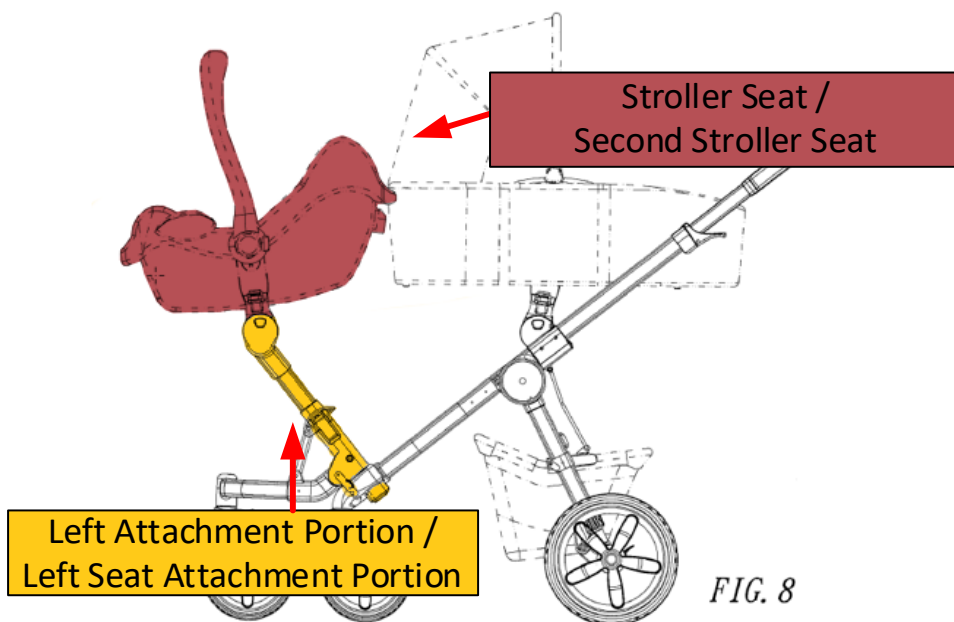
B. Claims 2 & 25

2, 25	The seat attachment for a stroller of claim 1, wherein the seat is a baby seat, a car seat, a stroller seat, a bassinet, or a pram.	The seat attachment for a stroller of claim 24, wherein the seat is a baby seat, a car seat, a stroller seat, a bassinet, a baby carrier, or a pram.
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155. Liao discloses that the seat may be a baby seat, a car seat, a stroller seat, a bassinet, or a pram. Figs. 10 and 11 show a baby seat (e.g., a seat for a baby stroller). FIG. 8 shows a car seat facing forward and a bassinet facing rearward. (EX1048, FIGS. 8-12.)

156. Accordingly, Liao discloses the additional limitations of claims 2 and 25.





157. As shown in FIGS. 10 and 11, the seat may be at least a stroller seat. FIG. 8 shows that the seat may be a car seat. (*Id.*, FIGS. 8, 10, 11.) As I understand it, the term “or” only requires that an anticipatory reference disclose at least one of the listed elements. However, not only does Liao disclose more than one of the listed types of seats, Liao discloses all of the listed types of seats.

158. FIG. 8 also shows a bassinet/pram in the rear seat position. (*Id.*, FIG. 8.) Visual inspection of FIG. 1 makes it clear that the seat support elements for the front seat function identically to the seat support elements for the rear seat. A POSITA would therefore understand that the figures in Liao are examples, and that the front seat support elements could also accommodate a bassinet/pram.

159. More generally, the seat support elements of Liao are capable of

supporting any type of seat, as the seat would just need matching connection elements compatible with the seat support elements shown in Liao. A POSITA would have understood that Liao uses standard connectors because each seat of Liao connects to the same seat support element on Liao, necessitating that the connectors function in a manner compatible with the seat support elements. Accordingly, a POSITA would have understood that any seat with an appropriate connector could be secured to Liao's seat support elements, and that modifying a seat to use an appropriate connector would be a simple task using conventional components. Accordingly, a POSITA would have a reasonable expectation of success making such a modification.

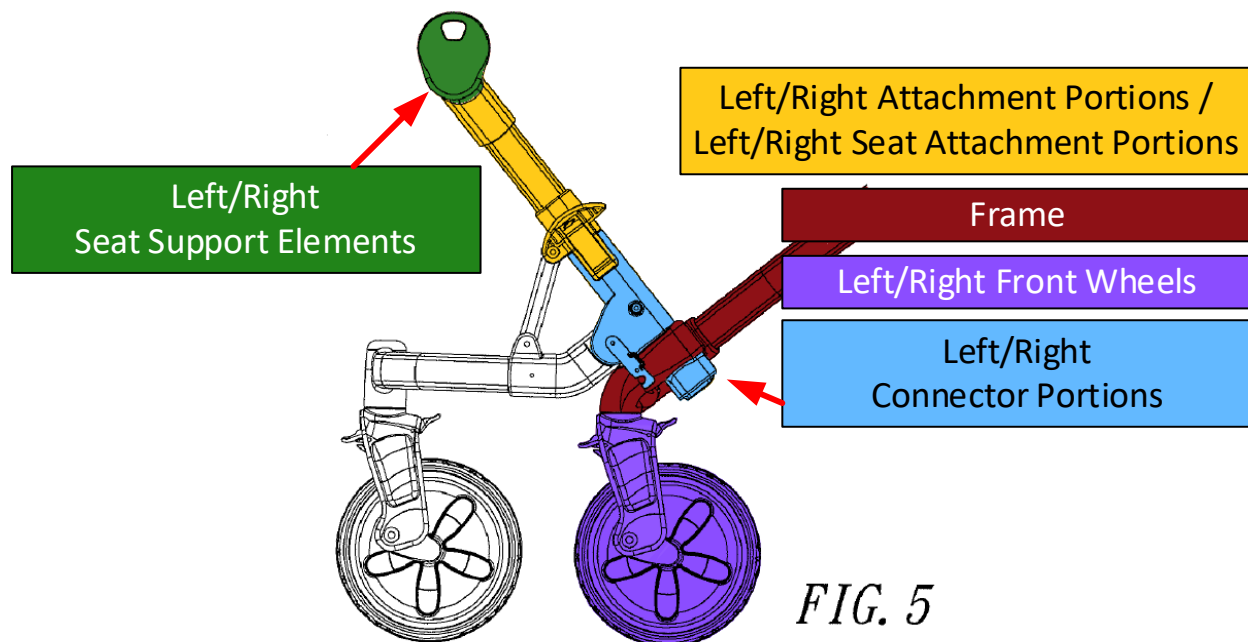
160. Accordingly, Liao discloses or renders obvious claims 2 and 25.

C. Claims 3-5 & 26-28

3, 26	The seat attachment for a stroller of claim 1, wherein each attachment portion has a first end and a second end.	The seat attachment for a stroller of claim 24 , wherein each of the left and right seat attachment portions has a first end and a second end.
4, 27	The seat attachment for a stroller of claim 3, wherein the first end is capable of connecting to the stroller frame.	The seat attachment for a stroller of claim 26 , wherein the first end is capable of directly connecting to a stroller frame.
5, 28	The seat attachment for a stroller of claim 4, wherein the second end is connected to the seat.	The seat attachment for a stroller of claim 27 , wherein the second end is connected to the seat.

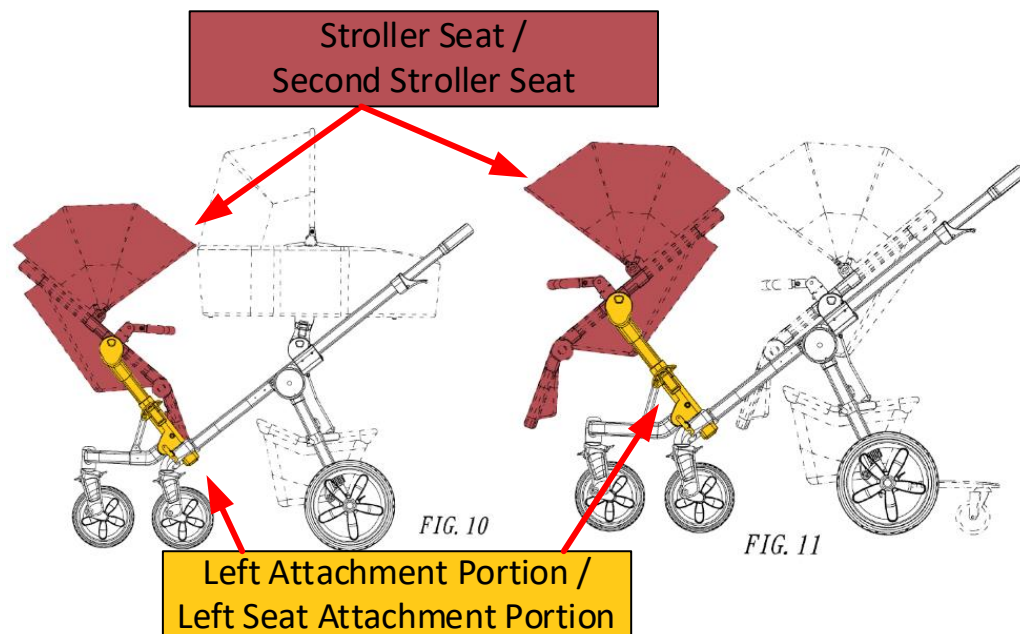
161. Each attachment portion has a first end and a second end, labeled

below. (EX1048, FIG. 5.) Accordingly, Liao discloses the additional limitations of claims 3/26.



162. As shown in FIG. 5 (above), each first end connects directly to the stroller frame. (*Id.*) Therefore, Liao discloses the additional limitations of claims 4/27.

163. As shown in FIGS. 8-12, each second end is connected to the seat. (*Id.*, FIGS. 8-12.) Therefore, Liao discloses the additional limitations of claims 5/28.



164. Claims 3-5 and 26-28 are related. Claims 3 and 26 require that the seat attachment portions of the stroller each have first and second ends. Claims 4, 5, 27, and 28 go on to further clarify that the first end should be capable of connecting to the stroller frame (which corresponds to the functionality of the connector portion), and that the second end should be connected to a seat (corresponding to the functionality of the seat support element).

165. Each attachment portion has a first end and a second end, labeled below. (*Id.*, FIG. 5.) Accordingly, Liao discloses the additional limitations of claims 3/26.

166. Specifically, Liao discloses the first and second ends because the connector portions (blue) are first ends of the attachment portions, and the seat support elements (green) are second ends of the attachment portions. FIG. 5 is

exemplary. (*Id.*, FIG. 5.)

167. Liao discloses connector portions that are, as discussed with respect to claim 1, capable of connecting to the stroller frame and which are, in fact, connected to the stroller frame. (*Id.*) Thus, Liao discloses first ends that are capable of connecting to the stroller frame. Thus Liao discloses claims 4/27.

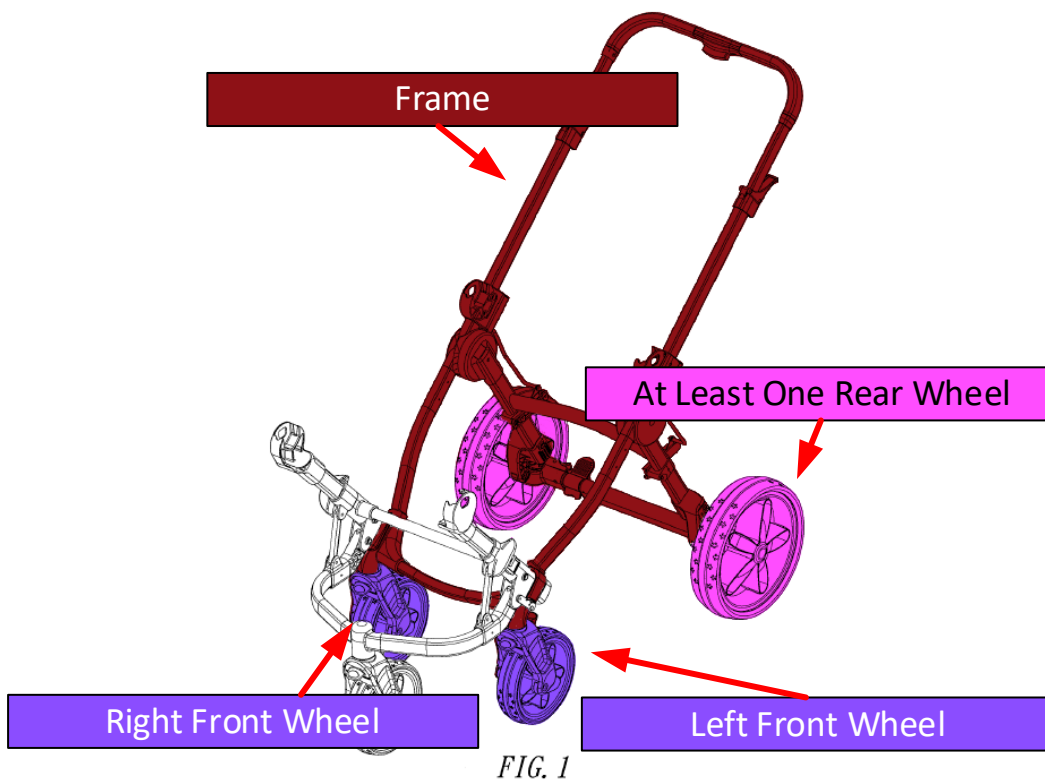
168. As shown in FIGS. 8-12, each second end is connected to the seat. (*Id.*, FIGS. 8-12.) Therefore, Liao discloses the additional limitations of claims 5/28.

169. Accordingly, Liao discloses all elements of claims 3-6 and 26-28.

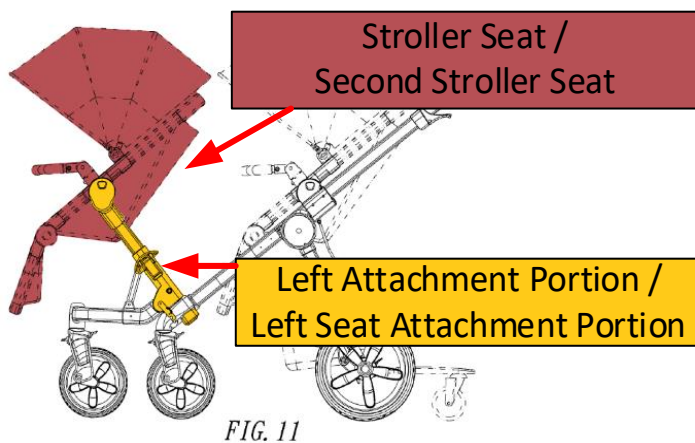
D. Claim 6

6 (Pre)	A stroller, comprising:
6 (a)	a frame;
6 (b)	two front wheels;
6 (c)	at least one rear wheel;
6 (d)	a stroller seat; and

170. Liao discloses a stroller comprising a frame, two front wheels, and at least one rear wheel, as labeled below. (EX1048, FIG. 1.)



171. Liao also discloses a stroller seat, labeled below. (*Id.*, FIG. 11.)



172. Therefore, Liao discloses [6(Pre)-(d)].

6 (e)	two attachment frame members connected to the frame adjacent to the front wheels,
-------	---

173. Liao discloses two attachment frame members connected to the frame

adjacent to the front wheels, labeled below. (EX1048, FIG. 1.)

174. Liao discloses two attachment frame members connected to the frame adjacent the front wheels. (EX. 1048, FIG. 1.) The attachment frame members are the portions of the frame that are configured to receive the connector portions of the seat attachment. FIG. 1 shows the slots (green) that constitute the two frame attachment members. (*Id.*) The attachment frame members are adjacent the front wheels. (*Id.*) That is, the attachment frame members (labeled above) are a part of the stroller adjacent the front wheels into which the connector portions insert. (*Id.*) As shown below, the attachment frame members are capable of receiving and supporting separate right and left seat attachment portions. (*Id.*, FIGS. 1, 4-5.)

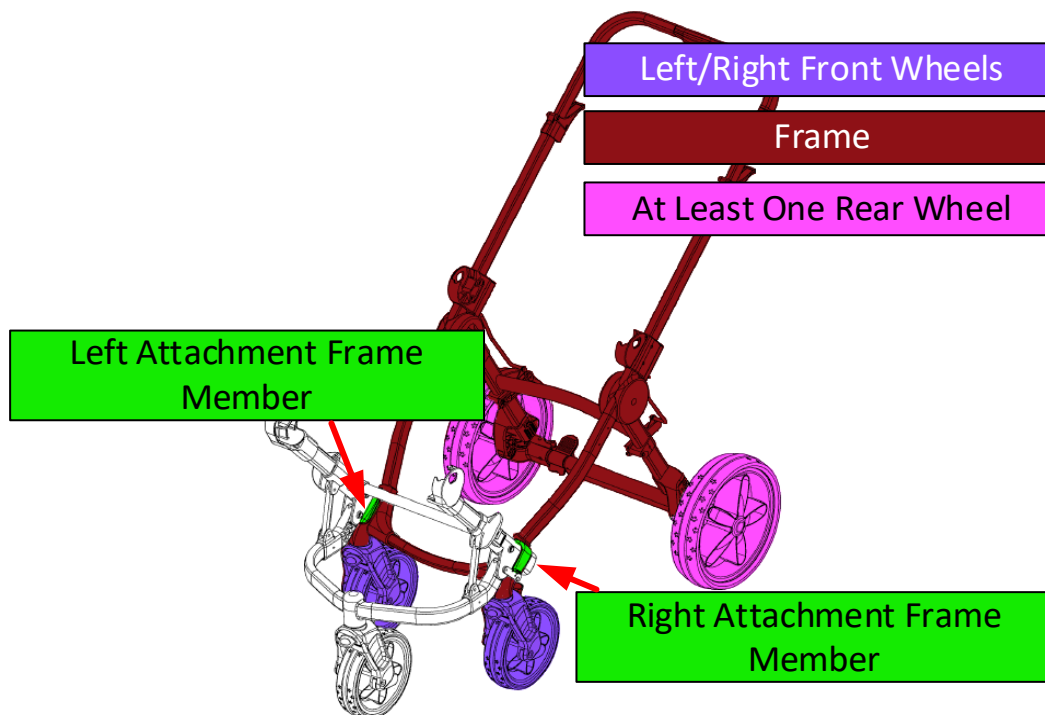
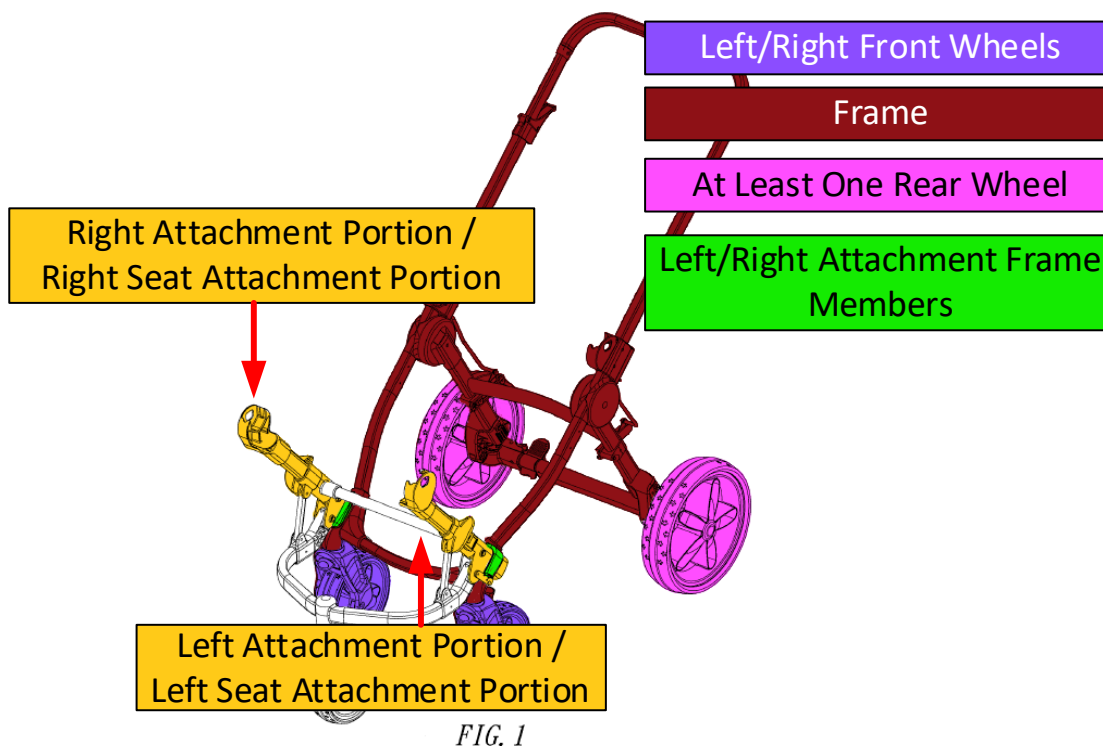


FIG. 1

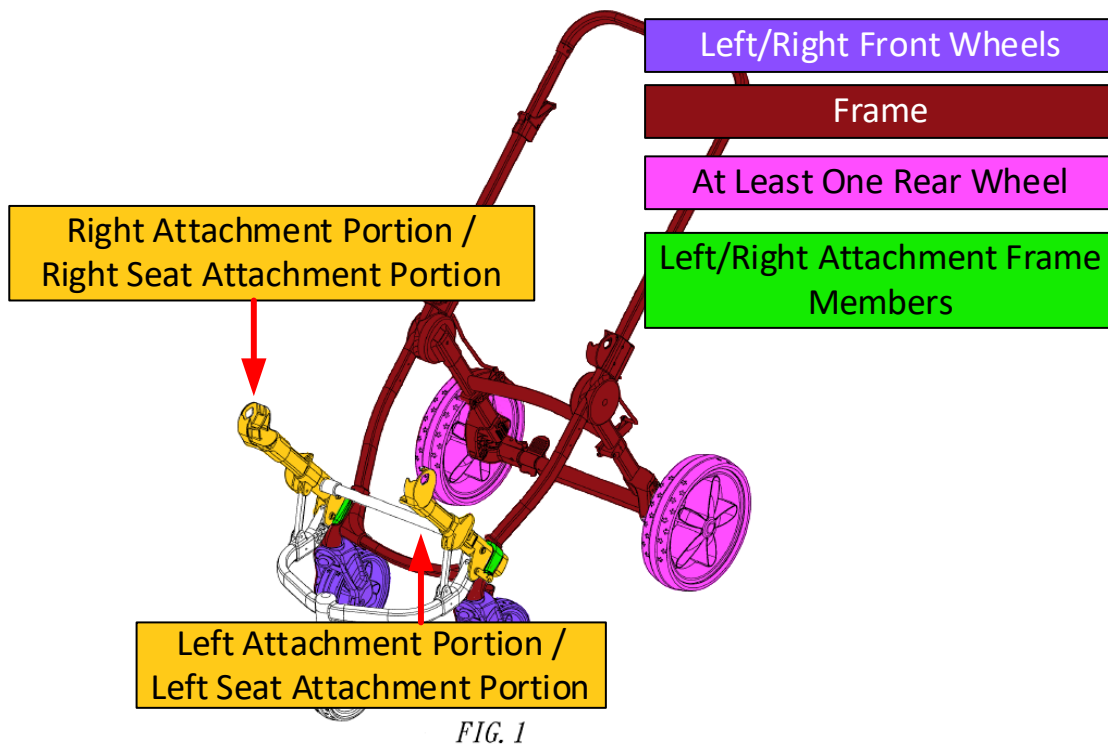
175. Therefore, Liao discloses limitation [6(e)].

176. The attachment frame members are a part of the stroller adjacent the front wheels into which the connector portions insert. (EX1048, FIG. 1.) As shown below, the attachment frame members are capable of receiving and supporting separate right and left seat attachment portions (EX1048, FIGS. 1, 4-5.) The attachment frame members are removably connected using the latches. As such, the attachment frame members are capable of removably receiving and supporting the seat attachment portions, and Liao discloses limitation [6(f)]. Alternatively, to the extent PO argues that the seat attachment portions are not removably received, such a feature would have been obvious in view of Liao.



6(f)	wherein the attachment frame members are capable of removably receiving and supporting separate right and left seat attachment portions,
------	--

177. The attachment frame members are removably connected to the seat attachment using the latches. (EX. 1048, FIGS. 1, 8.) As such, the attachment frame members are capable of removably receiving and supporting the seat attachment portions, and Liao discloses limitation [6(f)].



6 (g)	wherein each of the seat attachment portions comprises a connector portion for removably connecting to the attachment frame member and a seat support element for removably connecting a stroller seat between the seat attachment portions.
-------	--

178. Liao discloses connector portions and seat attachment portions. (EX1048, FIGS. 1, 4, 10, 11.) The connector portions of Liao are the lower parts of

the seat attachment portion that plugs into the stroller frame, and the seat support elements are the parts of the seat attachment portion that removably connects to a stroller seat. (*Id.*)

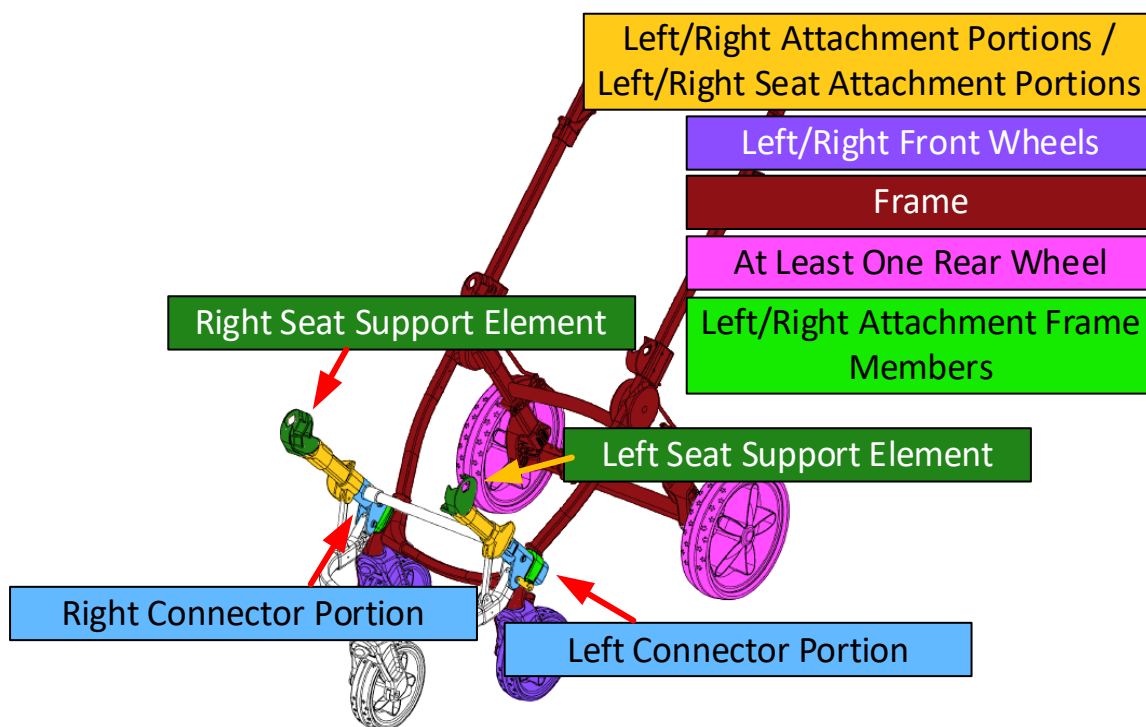


FIG. 1

179. There are two seat attachment portions and two connector portions, and the front seat is connected between the seat attachment portions. (*Id.*, FIG. 1.) As discussed *supra* §§ IX(A), Liao discloses or, alternatively, renders obvious, that each seat support element removably connects a stroller seat between the seat attachment portions.

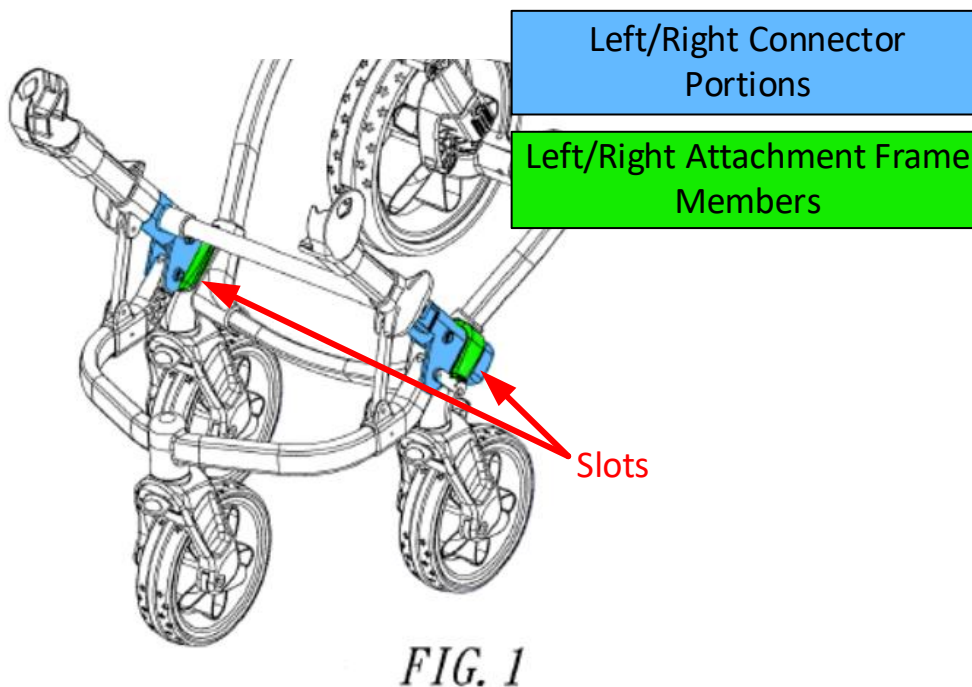
180. Accordingly, Liao discloses or, alternatively, renders obvious

limitation [6(g)].

E. Claim 7

7	The stroller of claim 6, wherein the attachment frame members comprise a slot for removably receiving the connector portion of the seat attachment portion.
---	---

181. As shown below, Liao's attachment frame members include slots for removably receiving the connector portion of the seat attachment portion. (EX1048, FIG. 1.)

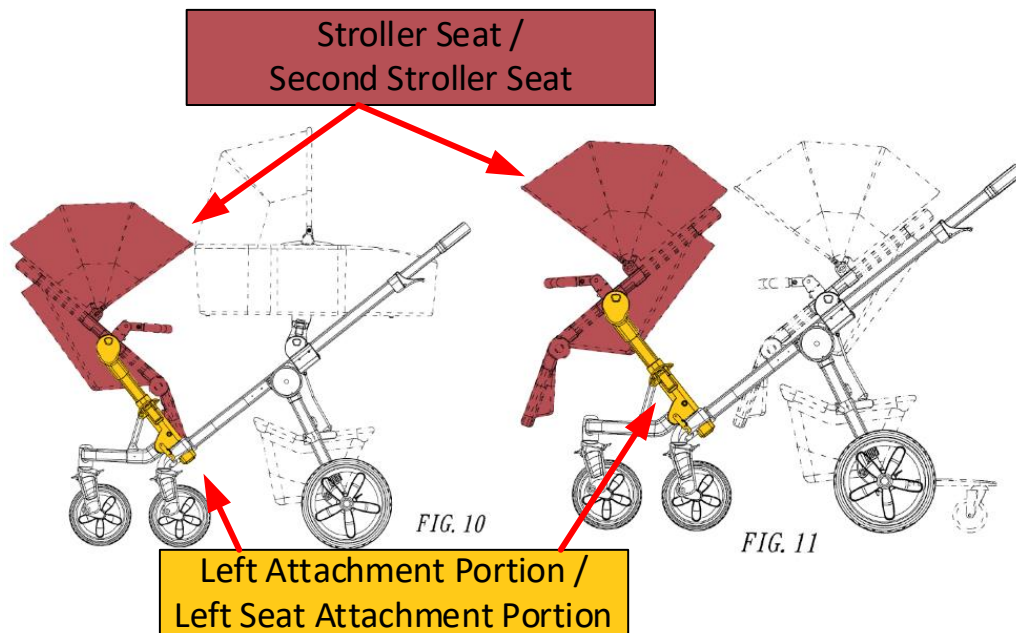


182. Accordingly, Liao discloses the additional limitations of claim 7.

F. Claim 8

8	The stroller of claim 6, wherein the frame of the stroller is capable of supporting a second seat and the second seat is selected from a stroller seat, an infant carrier, a bassinet, a pram, or a car seat.
---	---

183. Liao shows the stroller frame supporting stroller seats, car seats, and bassinets. (EX1048, FIGS. 8-12.) The rear seat can be supported on the frame , and the front seat can be supported by the attachment portions. (EX1048, FIGS. 8-12.)



184. Finally, as discussed with respect to claim 2, the term “or” requires that one or more of the elements in the list be shown, and Liao discloses all of the elements, including explicitly disclosing a stroller seat and a car seat, as shown in FIGS. 8 and 9. (*Id.*)

185. Accordingly, Liao discloses the additional limitations of claim 8.

G. Claim 9

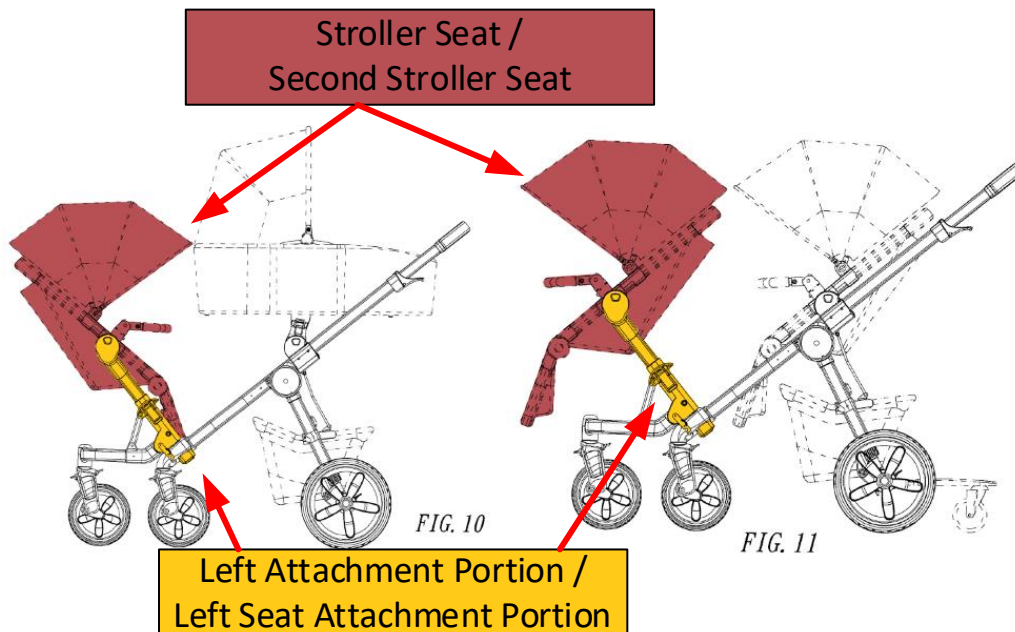
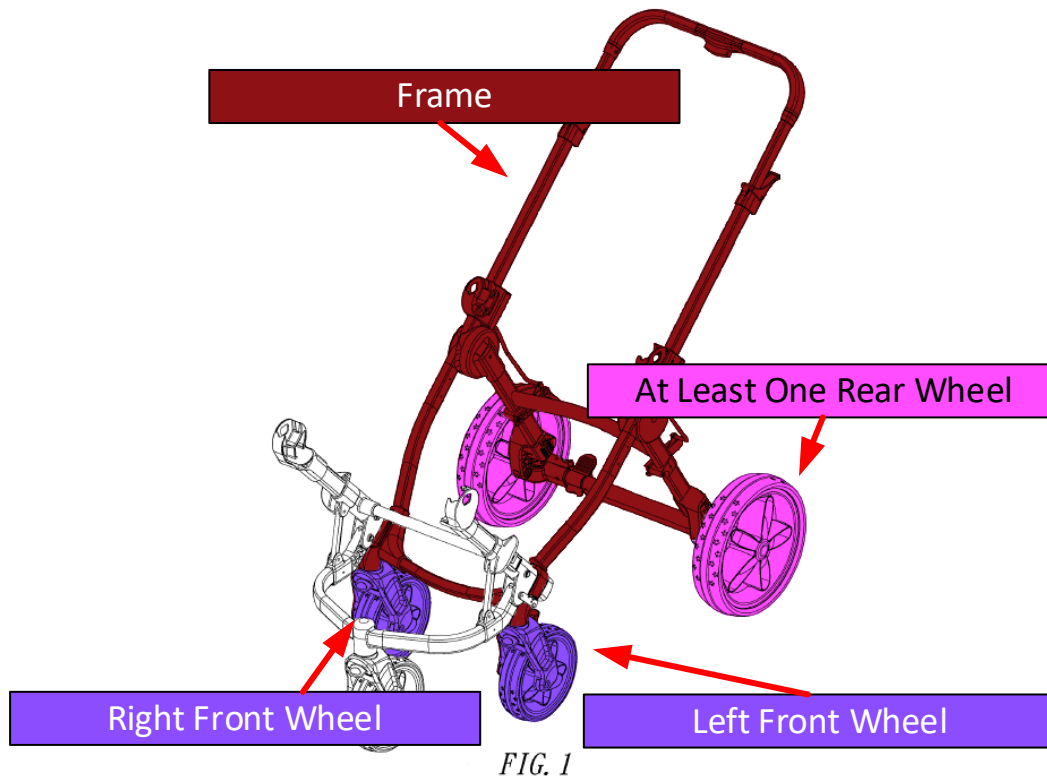
9 (Pre)	A stroller, comprising:
9 (a)	a first stroller seat reversibly and removably connected to a stroller frame having a left front wheel and a right front wheel;

186. Liao discloses a stroller. (EX1048, FIG. 1.) The stroller of Liao, as

shown in FIG. 1, includes a frame having left and right front wheels, and a first stroller seat (the rear stroller seat) reversibly and removably connected to the frame. (EX1048, FIGS. 1, 10, 11.) Figs. 10 and 11 show the rear seat facing backwards and forwards. (*Id.*) The frame also includes rear wheels, and a handle, as it is a fully functional stroller frame. (*Id.*)

187. Furthermore, each seat of Liao uses the same connection means to couple to the seat support element. (*Id.*, FIGS. 1, 8-12) FIGS. 10 and 11 of Liao show the same front seat facing both forward and backward. (*Id.*) A POSITA would therefore have understood that Liao teaches that any of its seats, front or rear, of any type can face either forward or backwards. (*Id.*) However, if PO argues that Liao does not disclose reversible seats, then such a feature would have been obvious in view of Liao, as discussed *supra* § IX(A).

188. Accordingly, Liao discloses or, alternatively, renders obvious limitations [9(Pre)-(a)].

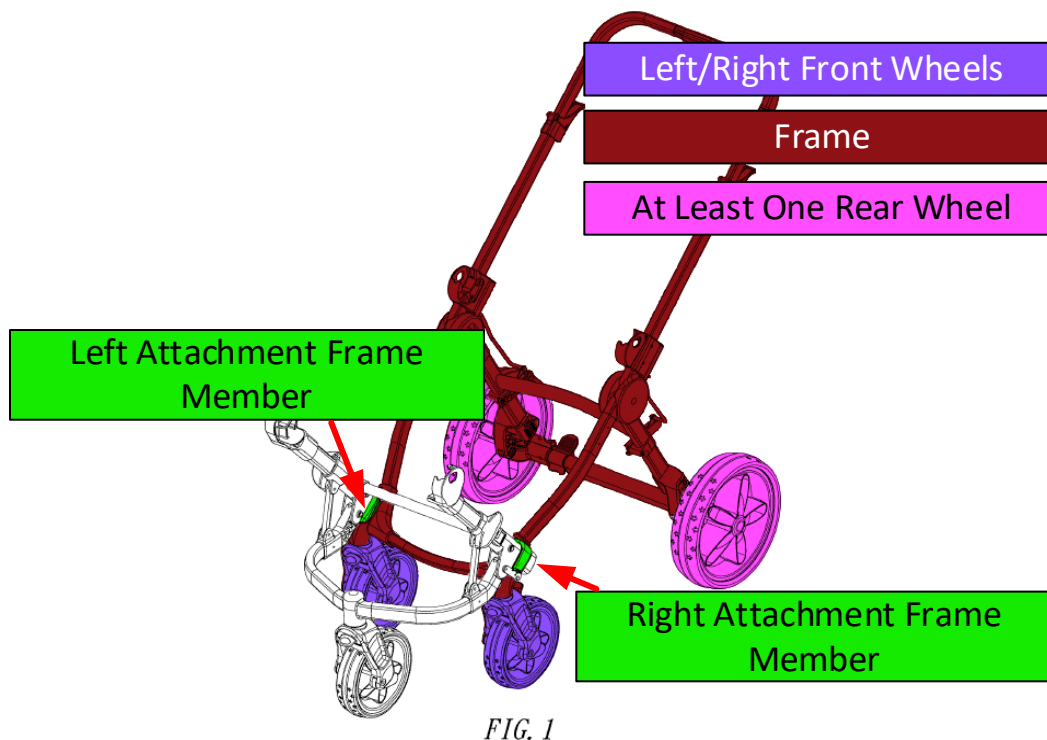


9 (b)	two attachment frame members attached to the stroller frame,
-------	--

9 (c)	wherein one attachment frame member is connected adjacent to the left front wheel and the other attachment frame member is connected adjacent to the right front wheel, and
-------	---

189. Liao discloses attachment frame members on either side of the stroller. (EX1048, FIGS. 1, 5.) The attachment frame members are the parts of the frame adjacent the front wheels where the connector portions insert through the frame and are latched to the frame. (*Id.*) There are left and right attachment frame members that are coupled adjacent, respectively, the left and right front wheels, as shown by FIG. 4. (*Id.*, FIG. 4) This is also evident from the previously established left-right symmetry of Liao, as shown in FIGS. 4 and 5. (*Id.*, FIGS. 4, 5.) FIG. 1 shows how the attachment frame members wrap around the connector portions of the left and right seat attachment portions. (EX1048, FIGS. 1, 4, 5.)

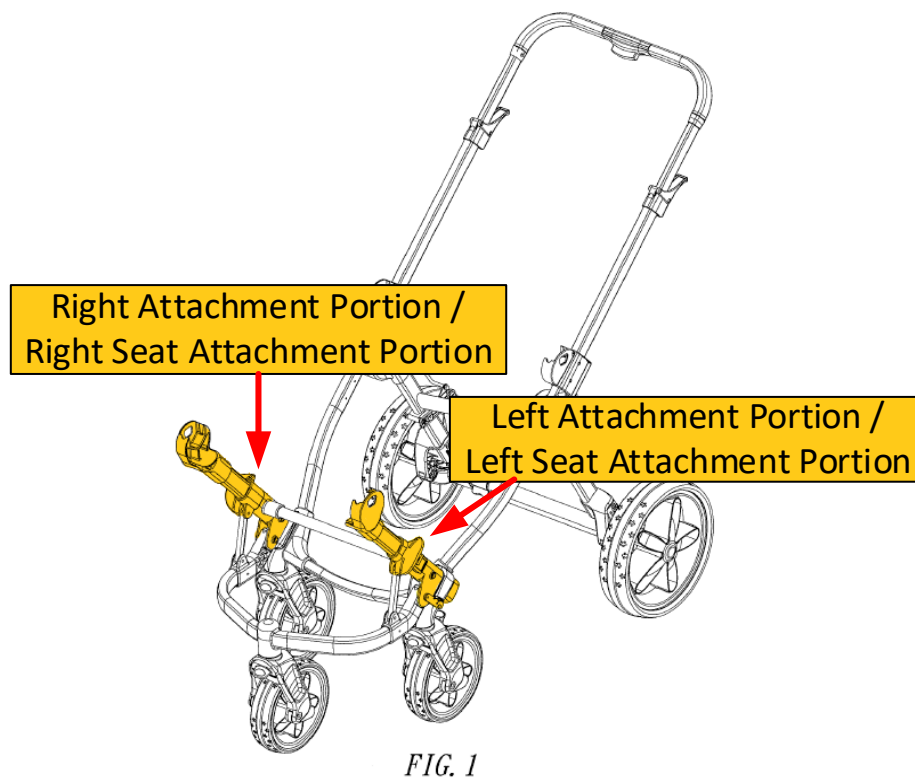
190. Accordingly, Liao discloses limitations [9(b)-(c)].



9 (d)	separate left and right seat attachment portions for converting the stroller into a double stroller, the seat attachment comprising:
-------	---

191. Liao discloses separate seat attachment portions removably receivable in the frame and supported by the left and right-side attachment frame members which allow the stroller to be converted into a double stroller. (EX1048, FIG. 1.)

192. Accordingly, Liao discloses limitation [9.d].



9 (e)	a connector portion capable of removably connecting to one of the attachment frame members above a respective front wheel of the stroller, and
9 (f)	a seat support element removably connecting a second stroller seat in either a forward or backward position.

193. Liao discloses that each seat attachment portion comprises a connector portion that removably connects to an attachment frame member, and a seat support element that removably connects a second stroller seat in both forward and backward positions. (EX1048, FIGS. 1, 10, 11.) The connector portion inserts into the slot, and is latched to the attachment frame member by the latch. (*Id.*, FIGS. 1, 5.) The seat support element is the top of the attachment portion engageable, as shown in FIGS.

10 and 11, to a seat. (*Id.*, FIGS. 10, 11.) FIGS. 4 and 5 also show the seat support elements and connector portions; FIGS. 10 and 11 show that the second stroller seat (here, the front seat) may be connected in either forward facing or rearward facing configurations. (EX1048, FIGS. 4, 5, 10, 11.)

194. Accordingly, Liao discloses limitations [9(e)-(f)].

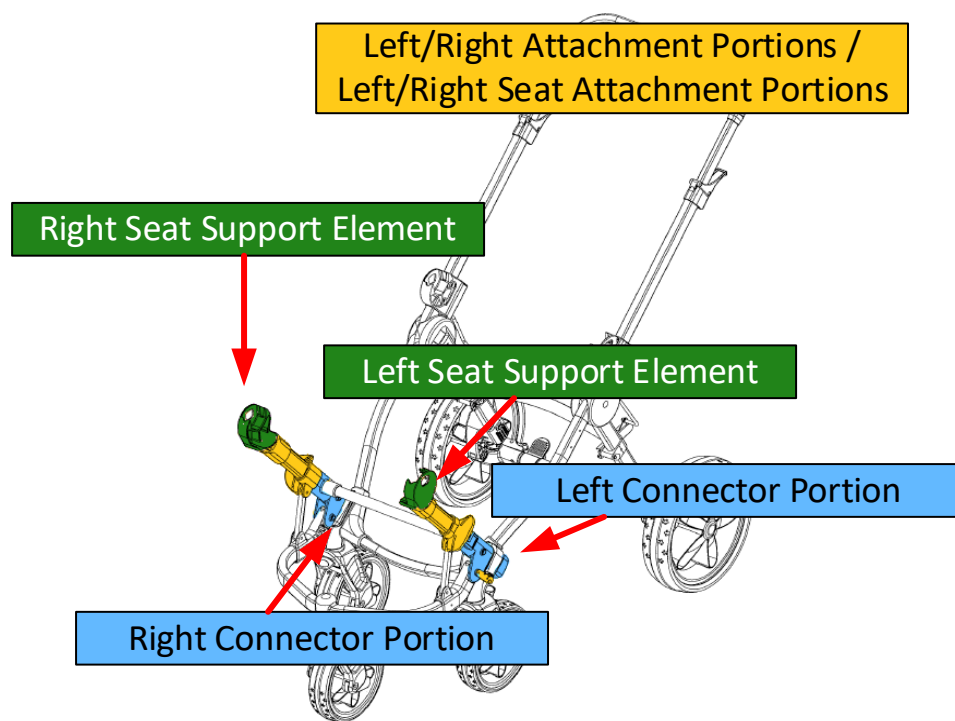
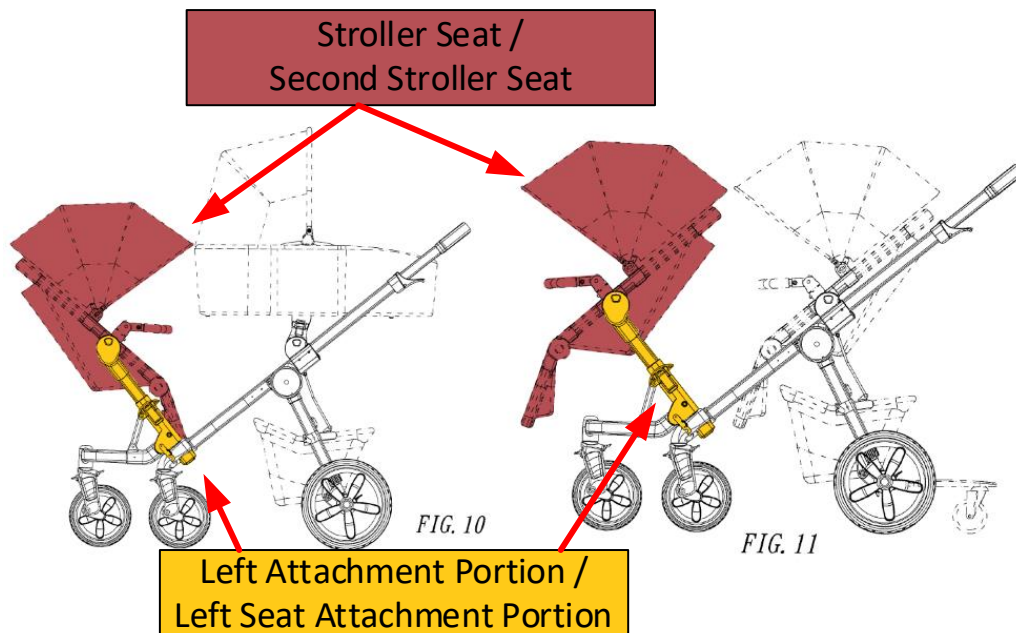
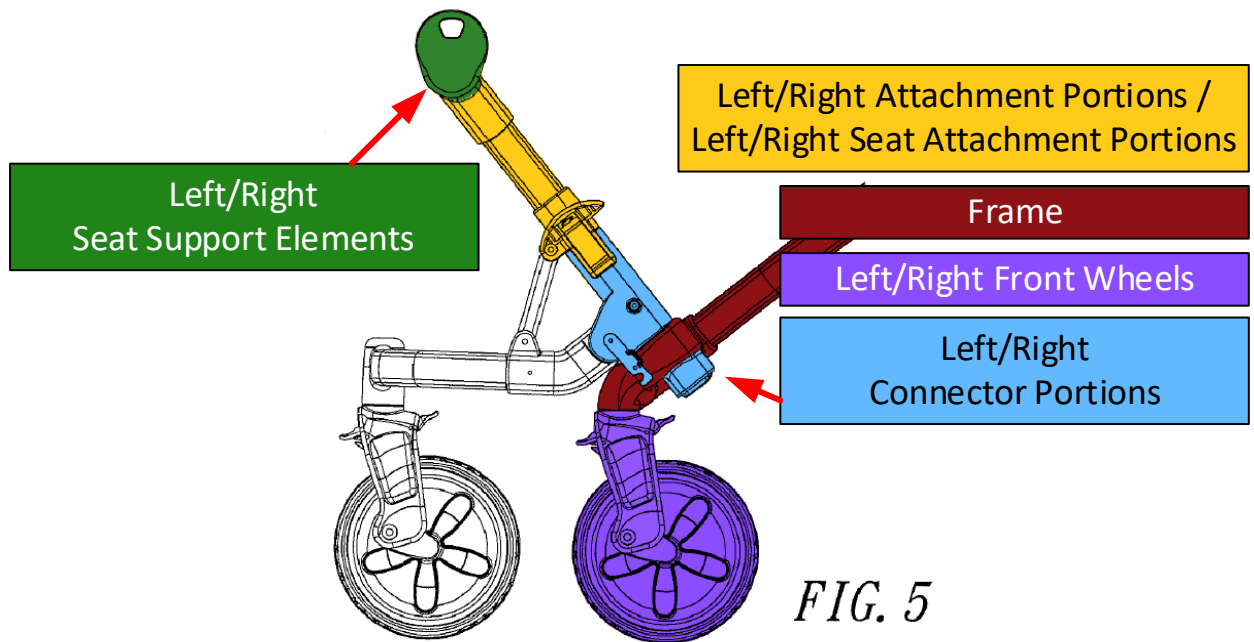


FIG. 1



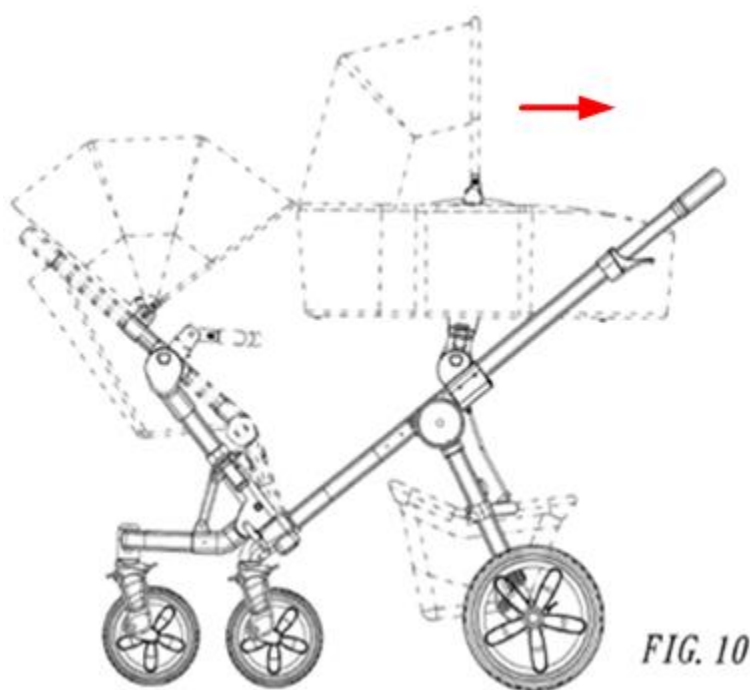
(EX1048, FIGS. 1, 5, 10-11.)

H. Claim 10

10	The stroller of claim 9, wherein the first stroller seat is releasably connected in a backward position.
----	--

195. Liao discloses a first seat (the rear seat) releasably connected in a backwards position. (EX1048, FIG. 10.) The first seat is releasably connected because it may be replaced with a different seat or removed, as discussed *supra* § IX(G). (EX1048, FIG. 10.)

196. Accordingly, Liao discloses the additional limitations of claim 10.



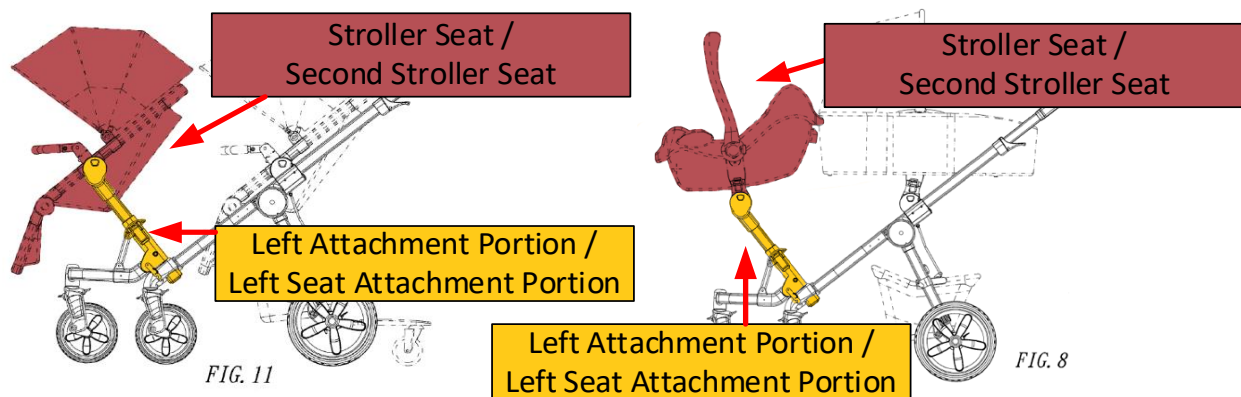
I. Claim 11

11	The stroller of claim 10, wherein the second stroller seat is one of a stroller seat, a car seat, or a bassinet.
----	--

197. Liao discloses that the second stroller seat (the front seat) is one of a stroller seat, car seat, or bassinet. In particular, FIG. 8 shows that the second stroller

seat may be a car seat, and FIG. 9 shows that the second stroller seat may be a stroller seat. (EX1048, FIGS. 8, 9, 11.)

198. Accordingly, Liao discloses the additional limitations of claim 11.

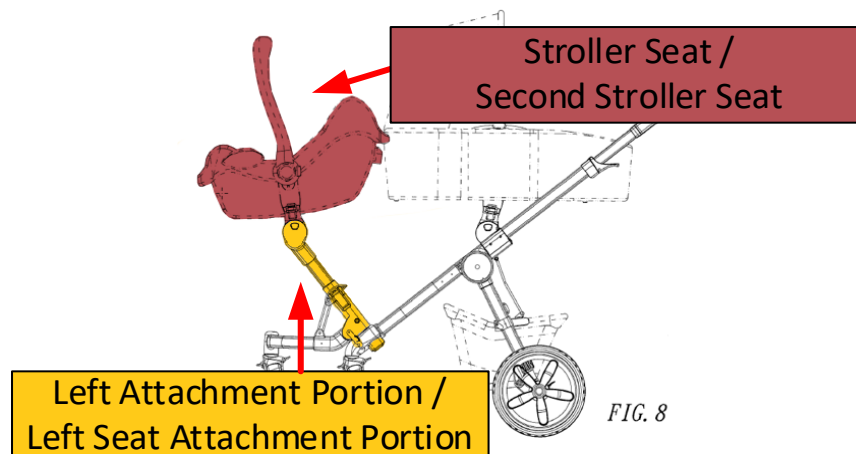


J. Claim 12

12	The stroller of claim 9, wherein the second seat is a bassinet or a car seat.
----	---

199. Liao discloses wherein the second seat (the front seat) is a bassinet or a car seat. In particular, FIG. 8 shows a car seat coupled to the seat attachment portions in the front seat position. (EX1048, FIG. 8.) Liao's Specification states that FIG. 8 shows a car seat, pram body, and basket attached to the stroller. (EX1066, 34-35.)

200. Accordingly, Liao discloses the additional limitations of claim 12.



K. Claim 13

13	The stroller of claim 9, wherein the frame further comprises two folding mechanisms.
----	--

201. Liao discloses a frame with two folding mechanisms, as seen in FIG. 1. (EX1048, FIG. 1.) A POSITA would have understood that the round hubs permit the stroller to fold, because they are round hubs that function as joints for folding the stroller. (*Id.*) A POSITA would have also recognized that the round hubs are hinge points for collapsible strollers. (*Id.*) Therefore, Liao discloses two folding mechanisms.

202. Furthermore, a POSITA would have known that the various linkages of Liao are used for permitting the stroller to fold, and would therefore have understood the hubs are folding mechanisms. (*Id.*)

203. Furthermore, Liao shows two control mechanisms on its handle, a button and levers. (*Id.*) One of these mechanisms (the levers) is for telescoping the

handle. (*Id.*) A POSITA would have known that the other mechanism (the button) is a conventional actuator for the folding mechanism (pink), which allows the frame to fold. (*Id.*)

204. My reading of Liao is further confirmed by Liao's contemporaneous filing of his Taiwanese design patent No.129880, directed to the exact same design. (EX. 1052, UPD.) After inspection of a certified translation of the design patent filed in Taiwan 3 days prior to the U.S. filing date. The Taiwanese design Patent was filed with the same pictures with the applicant the same as the assignee in the U.S. case, Unique Products Designs. In section 5 in the first paragraph under "Features of the Invention" of the Taiwanese design patent D129880 it is stated "a circular articulation is provided between the middle of the main frame and the rear wheel stand for unfolding and folding." (*Id.*)

205. Additionally, the U.S. Patent and Trademark Office shares my opinion that Liao "is adjustable between a folded configuration and an unfolded configuration" and discloses, "wherein the handle portion and the front wheel support portion are substantially parallel when the stroller frame is in the unfolded configuration." (EX. 1068, '449 Patent File History, 950-53.)

206. Accordingly, Liao discloses the additional limitations of claim 13.

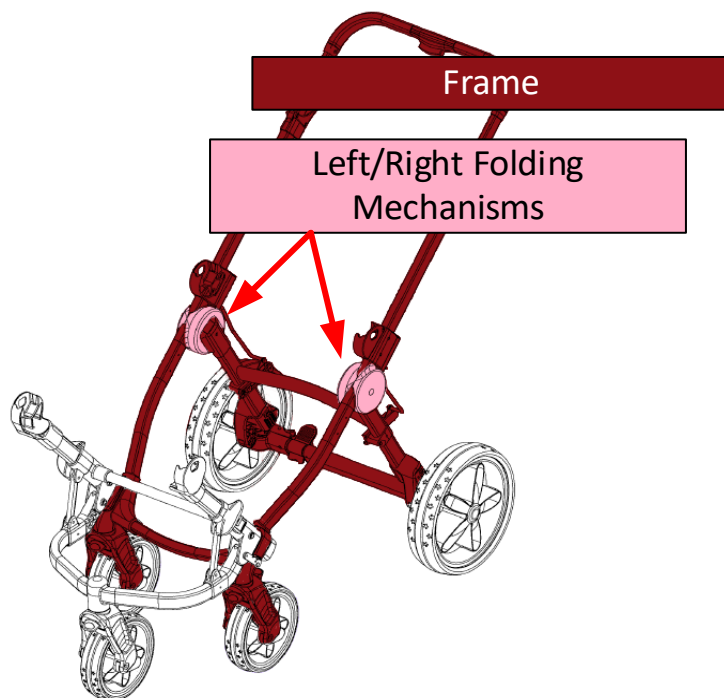
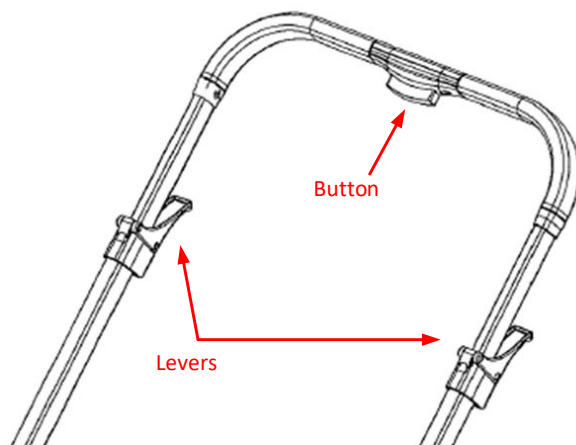


FIG. 1



L. Claim 14

14	The stroller of claim 10, wherein the first seat comprises a releasable connection including a button or a locking tab.
----	---

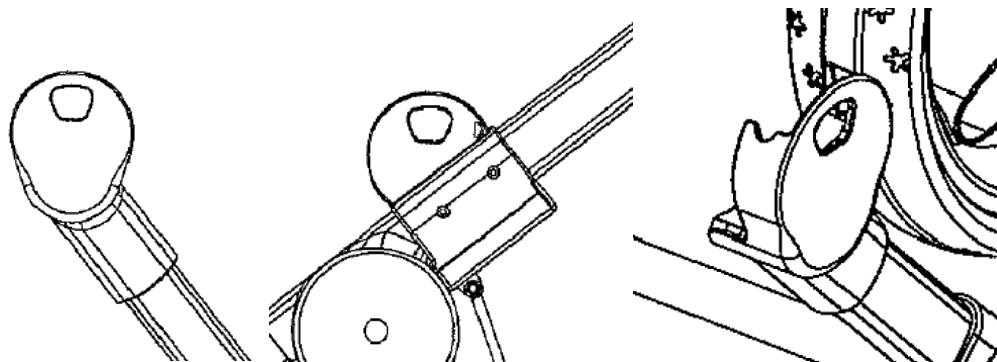
207. Liao's seat includes a releasable connection including a button or locking tab. (EX1048, FIG. 1.) As shown in FIG. 5, both front and rear seat support

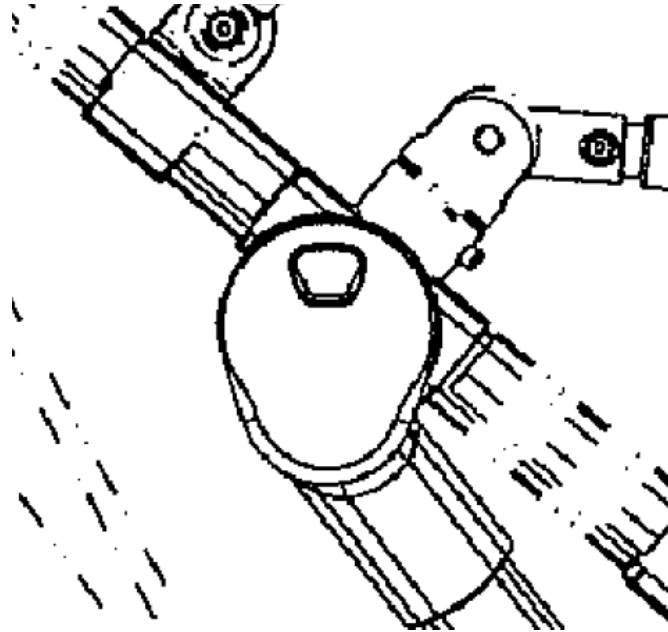
elements have a small hole in them; FIG. 1 shows that this is a proper hole as it has depth and can be seen through. (*Id.*, FIG. 1, 5.)

208. It would have been clear to POSITA that this hole is for a locking tab or button that allows the seat to be removed, as Liao's seats are removable as established above, and as shown in FIG. 9. (*Id.*, FIG. 9.)

209. To the extent that Liao does not explicitly disclose that these are locking tabs and/or buttons, it would have been obvious to use spring-biased buttons on the seats to go through the holes of the seat support elements of Liao. A POSITA would have known that it was desirable to use a mechanism to prevent the seat from unintentionally coming free. Furthermore, POSITA would have reasonably expected success because such a spring-biased mechanism was a conventional stroller seat component and well-within a POSITA's skills to implement.

210. Accordingly, Liao discloses or, alternatively, renders obvious the limitations of claim 14.



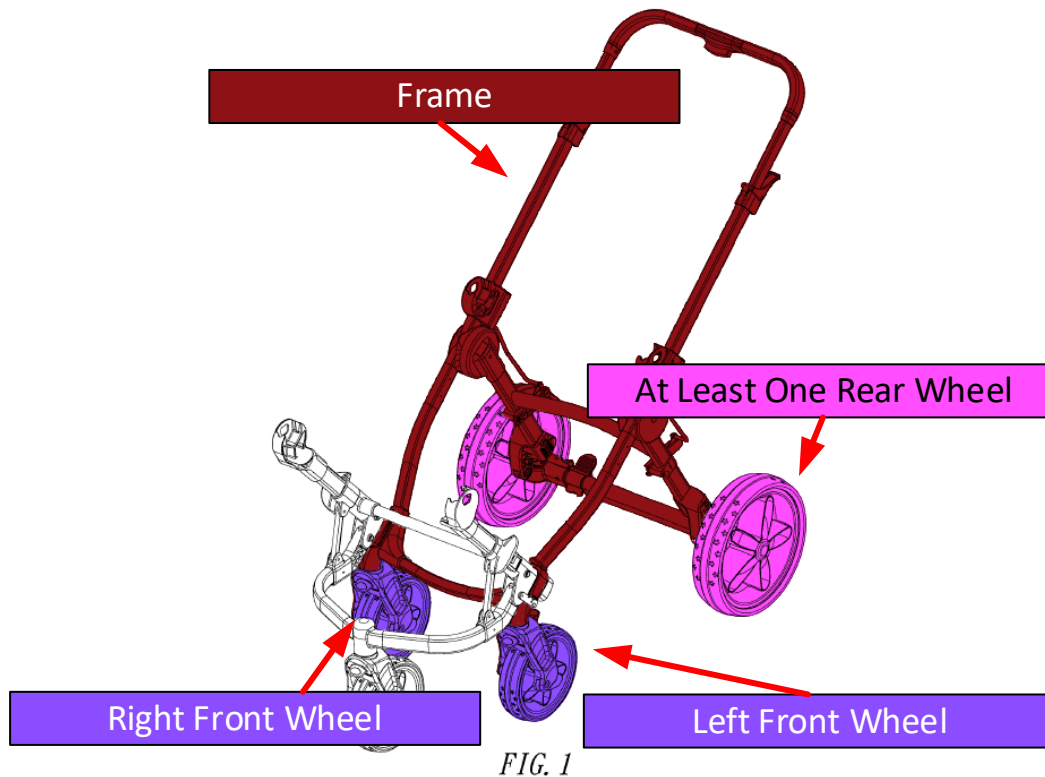


M. Claim 15

15	The stroller of claim 12, comprising a pair of back wheels.
----	---

211. Liao discloses a stroller with a pair of back wheels. FIG. 1 shows a pair of back wheels. (EX1048, FIG. 1.)

212. Accordingly, Liao discloses the limitations of claim 15.



N. Claim 16

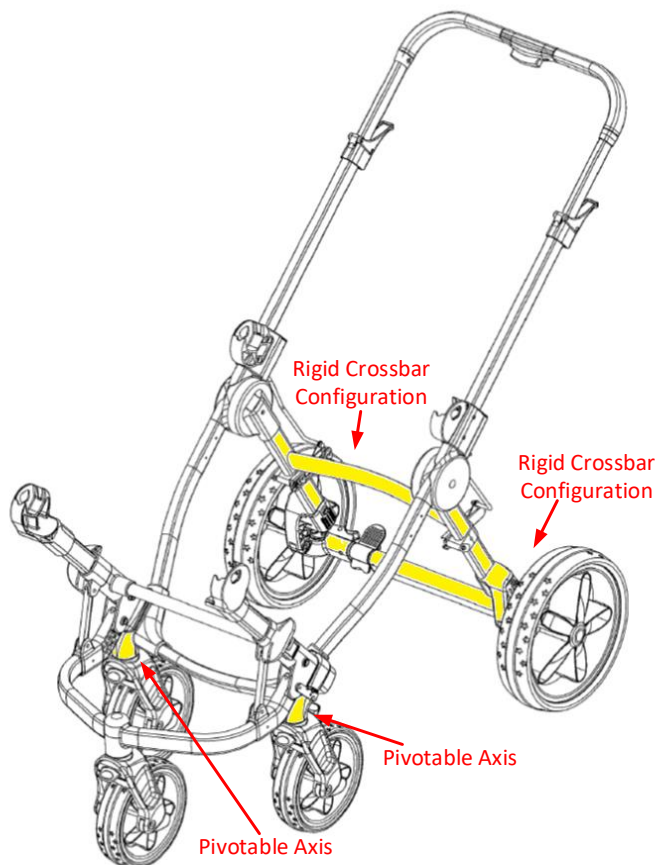
16	The stroller of claim 15 , wherein the front wheels pivot and the back wheels are fixed.
----	---

213. FIG. 1 shows a pivoting pair of front wheels on individual axes and a fixed pair of wheels in the back. (EX1048, FIG. 1.) This would have been evident to a POSITA because each front wheel is connected to the frame via an individual swivel mechanism (*Id.*) POSITA would have recognized the swivel, as they were commonly used for pivoting stroller wheels to facilitate steering. (*Id.*)

214. Secondly, the rear wheels are shown connected to the frame by a series of crossbars and vertical rear-wheel frame elements (in yellow). (*Id.*) A POSITA would have known that this rectangular configuration would not be capable of

pivoting and that the rear wheels are fixed. (*Id.*)

215. Accordingly, discloses the limitations of claim 16.

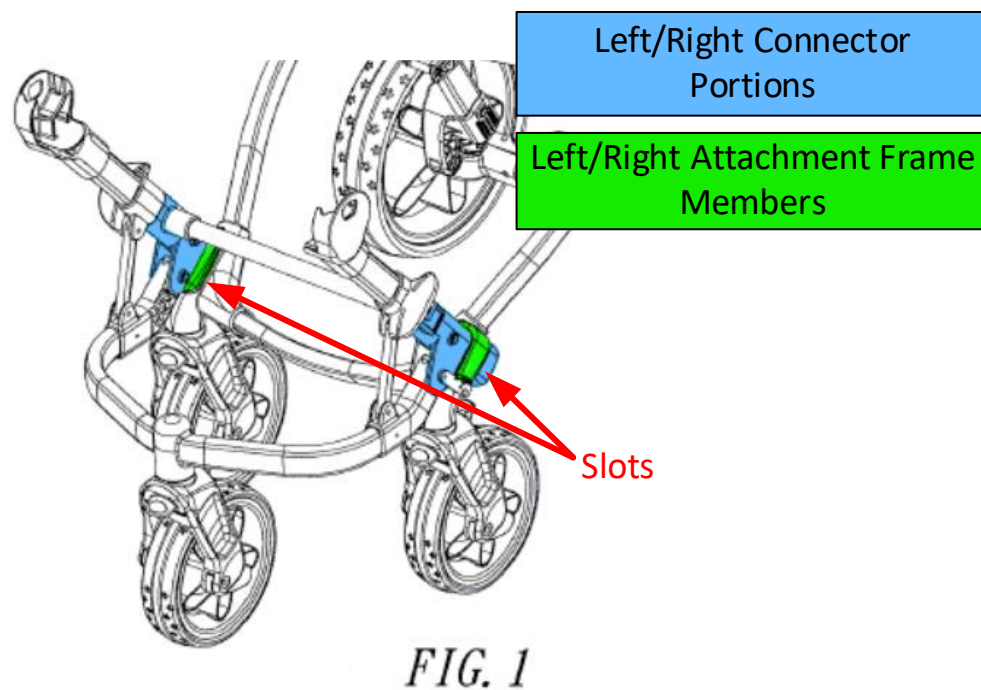
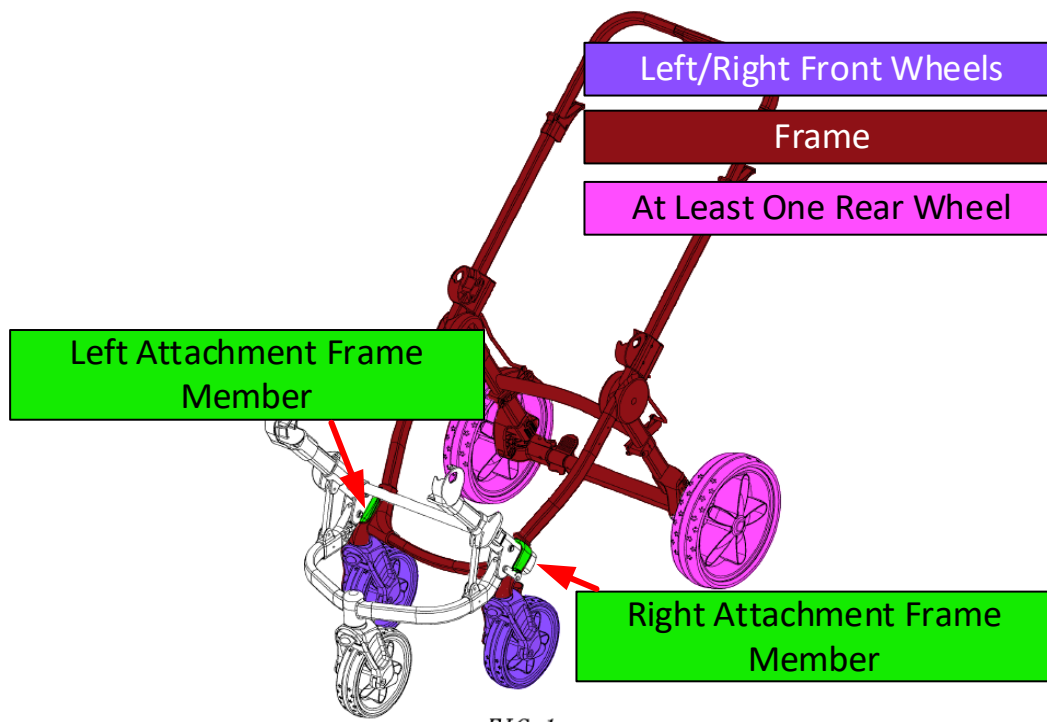


O. Claim 17

17	The stroller of claim 9, wherein one of the two attachment frame members is a right side attachment frame member and the other attachment frame member is a left attachment frame member.
----	---

216. Liao discloses a right side attachment frame member and a left side attachment frame member, as shown in FIG. 1. (EX1048, FIG. 1.)

217. Accordingly, Liao discloses the limitations of claim 17.



P. Claims 18-22

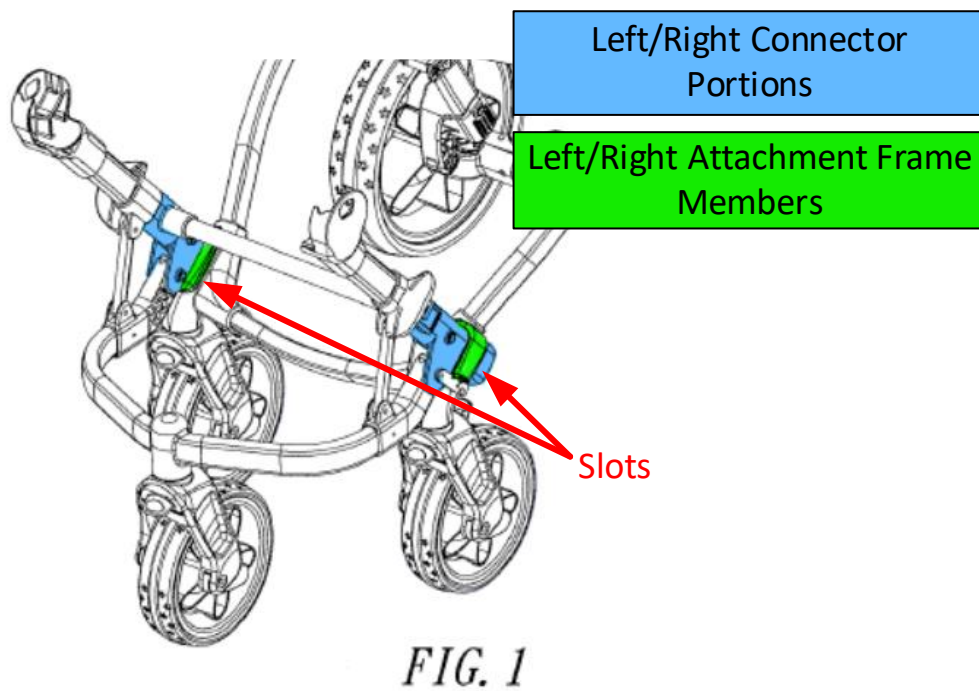
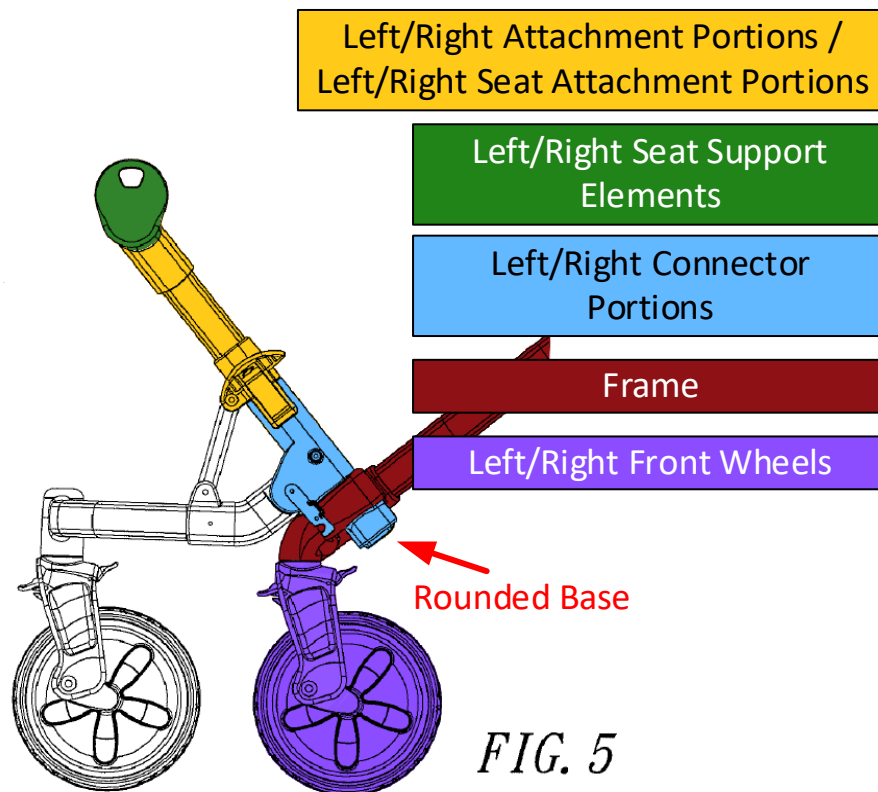
18	The stroller of claim 9 , wherein each of the connector portions has a cylindrical shape.
19	The stroller of claim 18 , wherein the attachment frame member has a cylindrical slot.
20	The stroller of claim 19 , wherein the connector portion of the seat attachment portion is inserted in the cylindrical slot.
21	The stroller of claim 9 , wherein the connector portion is tubular construction.
22	The stroller of claim 9 , wherein the connector portion has a circular cross-sectional shape.

218. The base of the connector portion is rounded, as shown in FIG. 1. (EX1048, FIG. 1.) The slot is rounded and wraps around the connector portion. (*Id.*) The connector of Liao is generally cylindrical as a result of the beveling of the surface visible in FIG. 1. (*Id.*) Because the connector portion of Liao is cylindrical, POSITA would have known that the slot of the attachment frame member is also cylindrical. (*Id.*) POSITA would have known that the connector portion is also tubular. (*Id.*) Finally, POSITA would have known that cylinders have generally circular cross-sections, and thus the connector, being generally cylindrical, would have had a circular cross-section. (EX1048, FIG. 1.)

219. Accordingly, Liao discloses that each connector portion has a cylindrical shape, including a cross-sectional circular shape, that each attachment frame member has a cylindrical slot, that the connector portion of the seat attachment inserts into the cylindrical slot, and that the connector portion has a tubular

construction. (*Id.*)

220. Furthermore, if PO argues that Liao does not disclose any of these elements, a POSITA would have been aware that cylindrical, circular, and tubular constructions, cross-sections, and slots, were typical, old, and well-known in the art long before the effective filing date of the '869 Patent. Accordingly, it would have been obvious to a POSITA based on the POSITA's general knowledge, and in view of common sense and as a design choice, to use cylindrical, circular, and/or tubular constructions, cross-sections, and/or slots for connector portions and receiver portions of the design of a stroller, the stroller's attachment frame members, and related accessories, such as the seat attachment and/or connector portion. POSITA would have had a reasonable expectation of success making modifications in line with the above because such modifications are conventional, well-known, and well-within POSITA's skills.

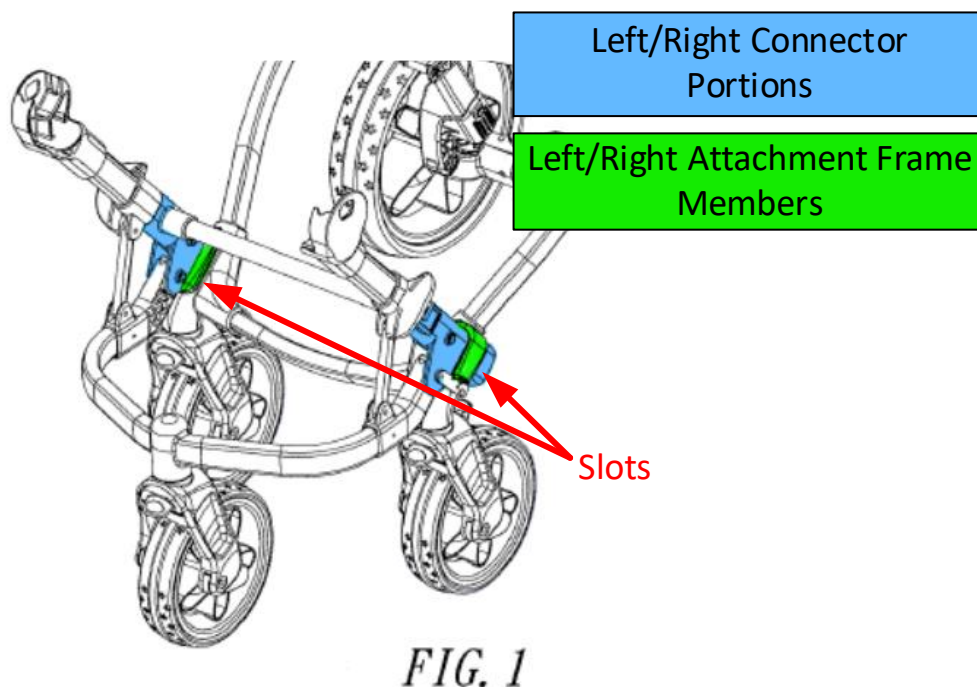


Q. Claim 23

23	The stroller of claim 9, wherein the connector portion has a complementary and cooperating shape that allows the connector portion to be secured to the attachment portion.
----	---

221. Liao discloses, in FIG. 1, a connector portion that can be plugged into the slot of the attachment frame member and secured thereto. (EX1048, FIG. 1.) As a result, the shape of the connector portion is necessarily complementary and cooperating with the shape of the attachment frame member. (*Id.*)

222. Accordingly, Liao discloses the limitations of claim 23.



223. I note that the term “attachment portion” is not used or present in claim 9. While “left and right attachment portions” are referred to, it would necessarily follow that the connector portion has a complementary and cooperating shape to that attachment portion to which it belongs because the connector portion is part of the

attachment portion. Therefore, it is my opinion that a POSITA would understand “attachment portion” here to be a typo, and that “attachment portion” is meant and actually refers to the attachment frame members. This belief is supported by contextual clues: for example, the connector portion is described, throughout the ‘869 Patent Specification, as being connected and/or secured to the frame and/or attachment frame members, not to the attachment portions of the seat attachment.

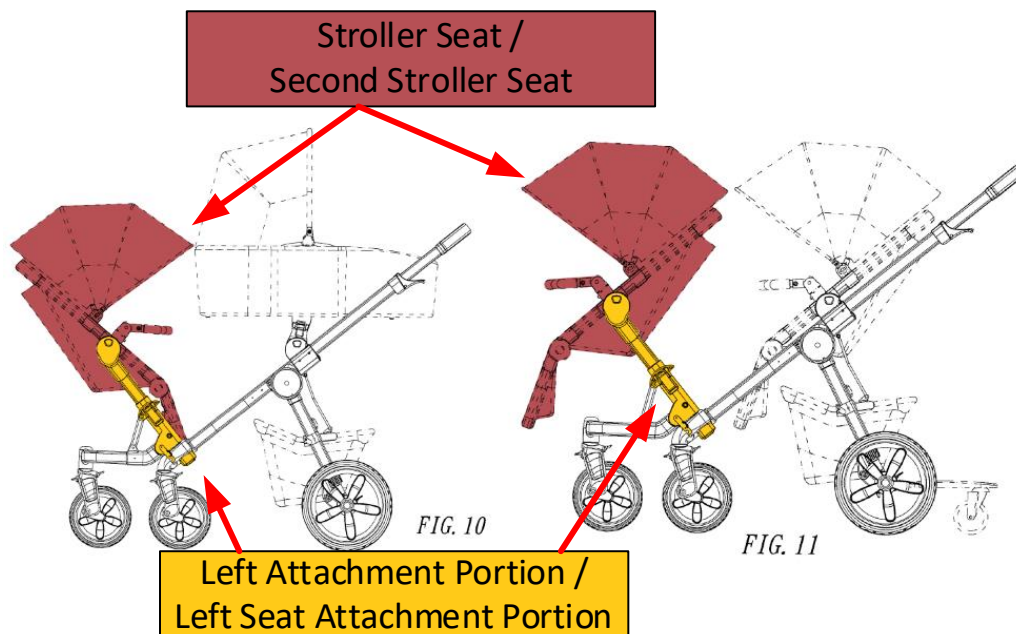
R. Claim 29

29	The seat attachment for a stroller of claim 24 , further comprising a stroller seat connected to the left seat support element and the right seat support element.
----	---

224. Liao discloses that the stroller seat is connected to both left and right seat support elements as shown in Figs. 10 and 11. (EX1048, FIGS. 10, 11.)

225. Furthermore, FIG. 1 of Liao shows that a stroller seat would be, necessarily, connected to both the left and right seat support elements when attached to the stroller. (*Id.*, FIGS. 1, 8-11.)

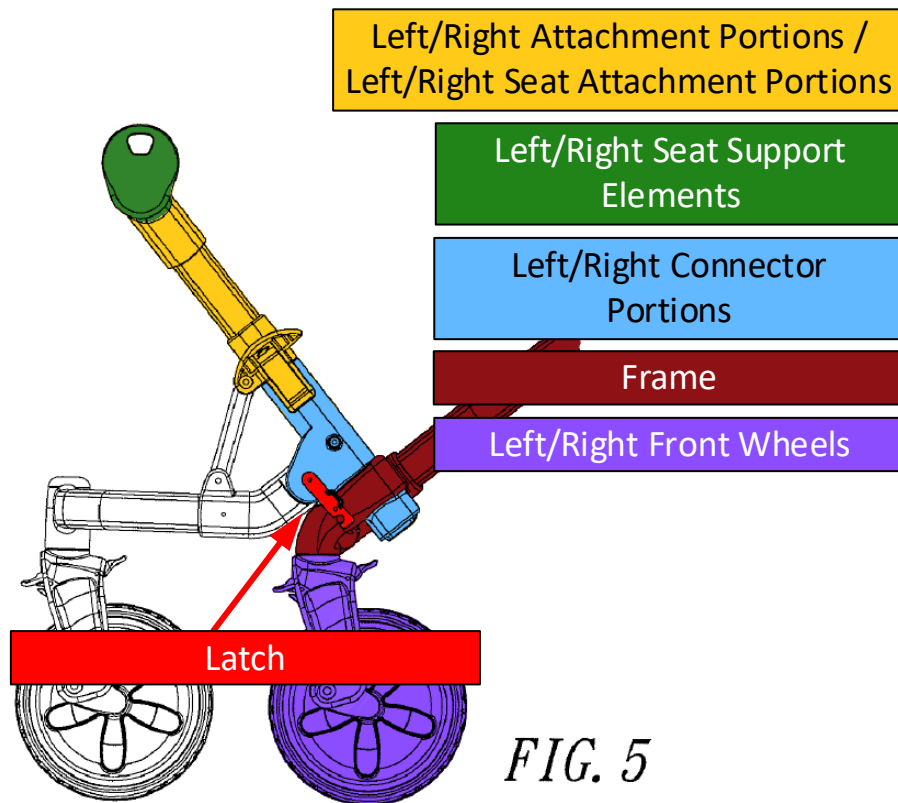
226. Accordingly, Liao discloses the limitations of claim 29.



S. Claim 30

227. Liao discloses at least a snap, friction fit, locking tab, or interference fit because Liao discloses a latch that latches on to a protrusion from the stroller frame to hold the seat attachment portions to the stroller frame. (EX. 1048, FIGS. 1, 5.) Such a latch is a snap at least in that it snaps on to the protrusion. (*Id.*) Furthermore, such a latch is held in place by friction by virtue of it snapping around the protrusion, and thus is a friction fit. (*Id.*) A latch is also a form of locking tab, and interferes with the removal of the seat attachment portions (thus being an interfering element for the interference fit). (*Id.*)

228. Accordingly, Liao the limitations of claim 30.



X. GROUND 2 – LIAO IN VIEW OF CHEN

Claims 1-12 and 15-30 were obvious in view of Liao, as explained with respect to Ground 1. (*Supra*, §§ IX.) However, if the Patent Owner argues that Liao fails to disclose one or more limitations of claims 1-12 or 15-30, then Liao and Chen render these claims obvious.

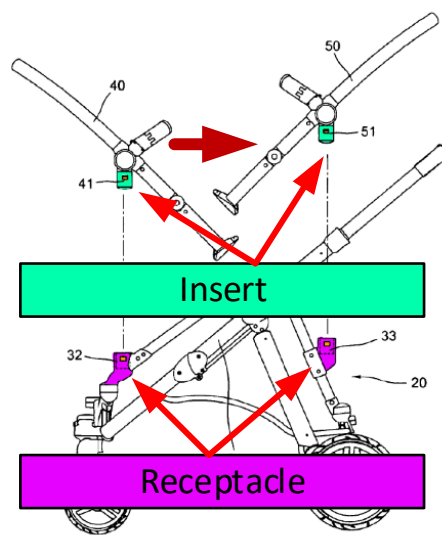
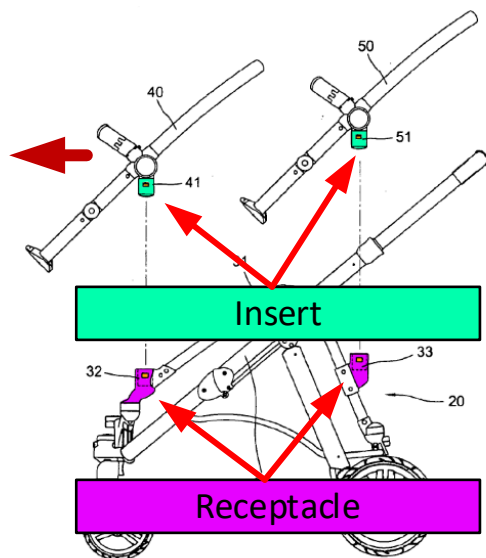
A. Independent Claims 1 & 24

229. As discussed *supra* § IX(A), Liao discloses a seat attachment for a stroller comprising separate left and right attachment portions with seat support elements. Chen discloses receptacles (32, 33) for a stroller into which inserts (41, 51) for seats can be removably inserted. (EX1065, ¶¶ 5-8, 24.) The inserts and receptacles permit the seat to face forward or backward. (*Id.*, ¶¶ 5-8, ¶¶ 24, 26, FIGS. 5 & 11.)

230. To the extent that Patent Owner argues that Liao's seat support elements do not already removably connect a seat in either a forward or backward position, POSITA would have been motivated to modify Liao's seat support elements to removably connect a seat in either a forward or backward position, as taught by Chen. (*Id.*, ¶¶ 5-6, 24.) POSITA would have been motivated to modify Liao's seat support elements as taught by Chen because POSITA would have known that it is desirable to use removable seats that can face both forward or backward because this makes it convenient to arrange the seats as desired, to adjust the seats

to face each other without interference, and to arrange the passengers in different ways. (*Id.*, ¶¶ 5-6.)

231. POSITA would have had a reasonable expectation of success combining Liao with Chen because both references disclose stroller systems that use conventional design components, and because integrating Chen's components and/or functionality into Liao would have been straight-forward use of known components and well within POSITA's skills.



232. Liao in view of Chen discloses or renders obvious the elements of claims 1 and 24 for the same reasons that Liao disclosed or rendered obvious claims 1 and 23, as discussed *supra* § IX(A).

233. Furthermore, with respect to elements [1b] and [1d] of claim 1 and elements [24b] and [24d] of claim 24, the combination of Liao and Chen discloses a

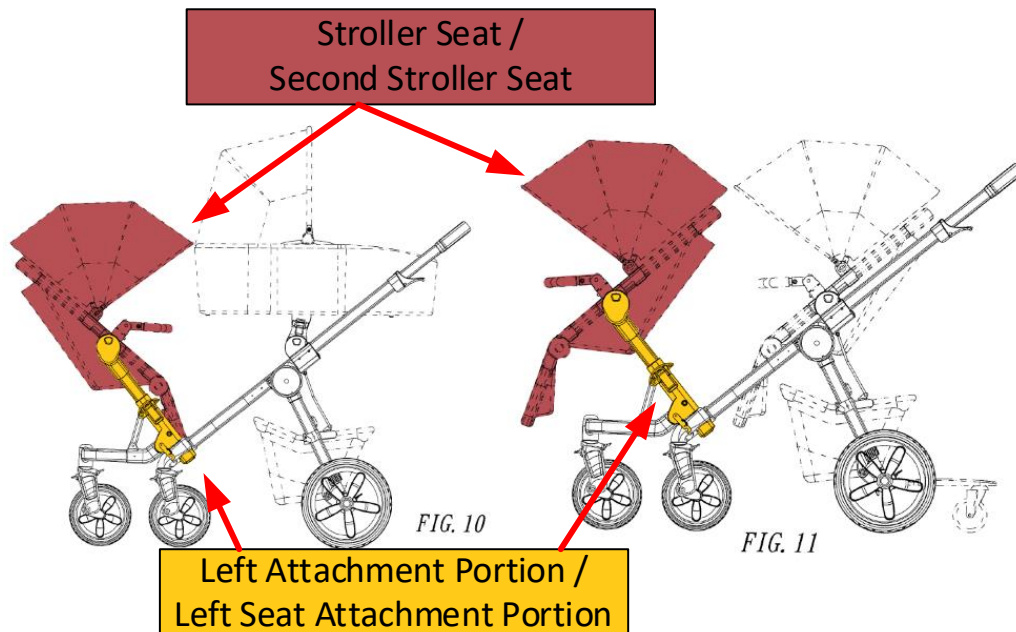
stroller with left and right seat support elements that are capable of removably connecting a seat facing either forward or backward because the combination of Liao and Chen incorporates Chen's forward and rear-facing functionality into Liao. (EX1065, ¶¶ 5-8, 24, 26.)

234. Accordingly, it would have been obvious to POSITA that Liao in view of Chen discloses the elements of claims 1 and 24. (*Id.*)

B. Claims 2 & 25

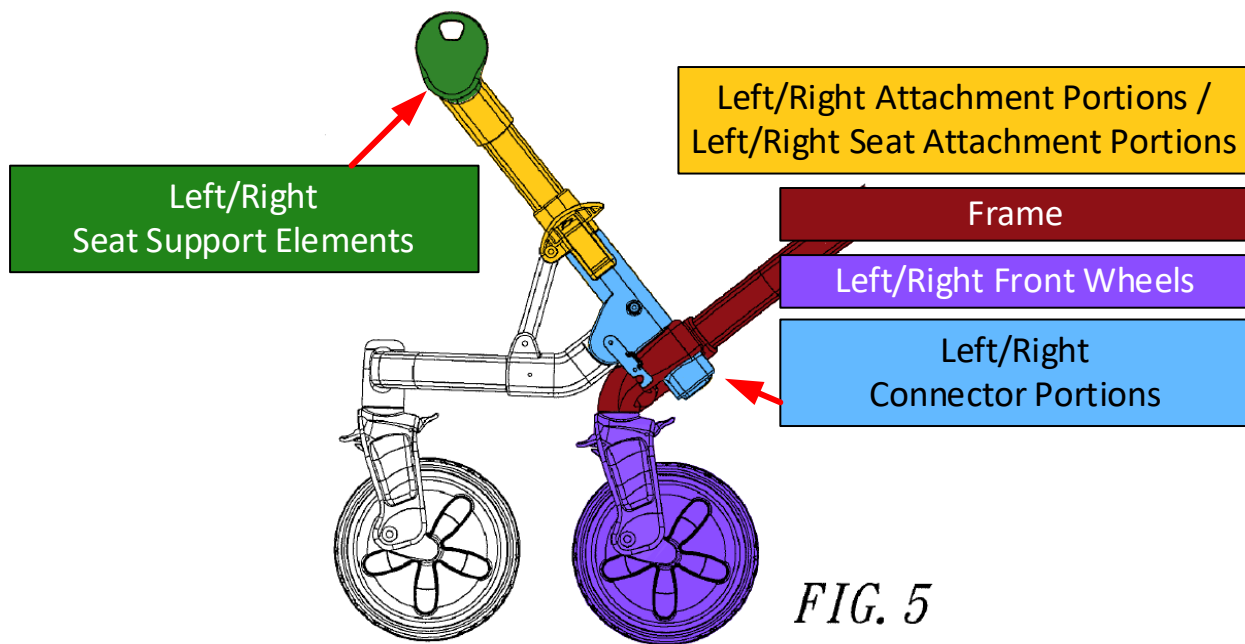
235. Liao in view of Chen discloses or renders obvious the elements of claims 2 and 25 for the same reasons that Liao disclosed or rendered obvious claims 2 and 25, as discussed *supra* § IX(B).

236. To the extent Patent Owner argues that Liao alone does not disclose the elements of claims 2 and 25, Chen also discloses that the seats are stroller seats. (EX1065, Chen, ¶¶ 5-8, 24, 26.) It would have been obvious to POSITA to use stroller seats in a stroller since stroller seats permit an infant to be carried by the stroller and are a standard feature of prior art strollers. (*Id.*)



C. Claims 3-5 & 26-28

237. Liao in view of Chen discloses or renders obvious the elements of claims 3-5 and 26-28 for the same reasons that Liao disclosed or rendered obvious claims 3-5 and 26-28, as discussed *supra* § IX(C).



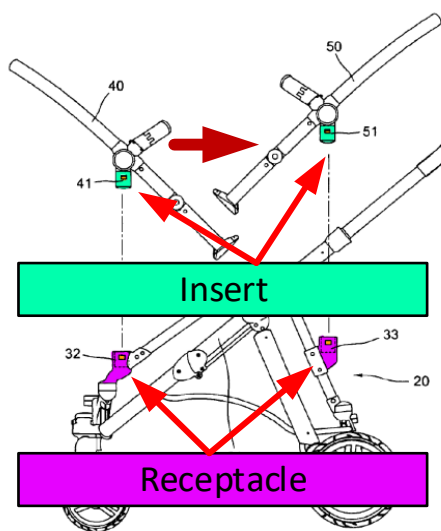
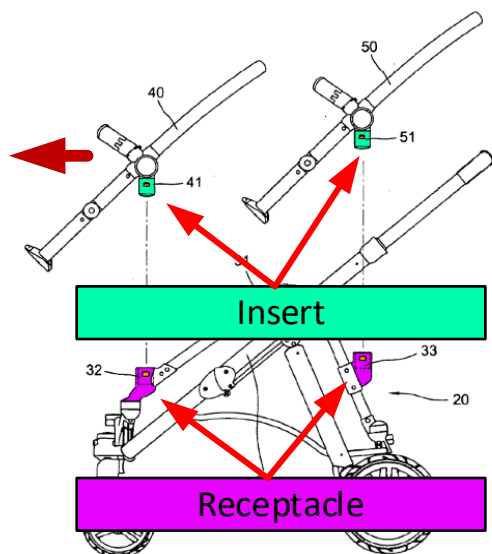
D. Independent Claim 9

238. As discussed supra § IX(G), Liao discloses a stroller and a seat attachment for a stroller comprising separate left and right attachment portions with seat support elements. Chen discloses receptacles (32, 33) for a stroller into which inserts (41, 51) for seats can be removably inserted. (EX1065, ¶¶ 5-8, 24.) The inserts and receptacles permit the seat to face forward or backward. (*Id.*, ¶¶ 5-8, ¶¶ 24, 26, FIGS. 5 & 11.)

239. To the extent that Patent Owner argues that Liao's seat support elements do not already removably connect a seat in either a forward or backward position, POSITA would have been motivated to modify Liao's seat support elements to removably connect a seat in either a forward or backward position, as

taught by Chen. (EX1065, ¶¶ 5-6, 24.) POSITA would have been motivated to modify Liao's seat support elements as taught by Chen because POSITA would have known that it is desirable to use removable seats that can face both forward or backward because this makes it convenient to arrange the seats as desired, to adjust the seats to face each other without interference, and to conveniently arrange the passengers in different ways. (*Id.*, ¶¶ 5-6.)

240. POSITA would have had a reasonable expectation of success combining Liao with Chen because both references disclose stroller systems that use conventional design components, and because integrating Chen's components and/or functionality into Liao would have been straight-forward use of known components and well within POSITA's skills.



241. Liao in view of Chen discloses or renders obvious the elements of claim

9 for the same reasons that Liao disclosed or rendered obvious claim 9, as discussed *supra* § IX(G).

242. Furthermore, with respect to element [9f] of claim 9, the combination of Liao and Chen discloses a stroller with left and right seat support elements that are capable of removably connecting a seat facing either forward or backward because the combination of Liao and Chen incorporates Chen's forward and rear-facing functionality into Liao. (EX1048, ¶ 5-8, 24.)

243. Accordingly, it would have been obvious to POSITA that Liao in view of Chen discloses the elements of claim 9.

E. Claim 10

244. Liao in view of Chen discloses or renders obvious the elements of claim 10 for the same reasons that Liao disclosed or rendered obvious claim 10, as discussed *supra* § IX(H).

245. Furthermore, as discussed *supra* § X(D), Chen discloses means for reversibly and removably coupling a seat to a stroller. (*Id.*) This functionality was integrated into Stopp in the discussion of claim 9, *supra* § X(D), and it would be obvious to POSITA to use the available functionality as intended. (*Id.*)

246. Accordingly, it would have been obvious to POSITA that Liao in view of Chen discloses the elements of claim 10.

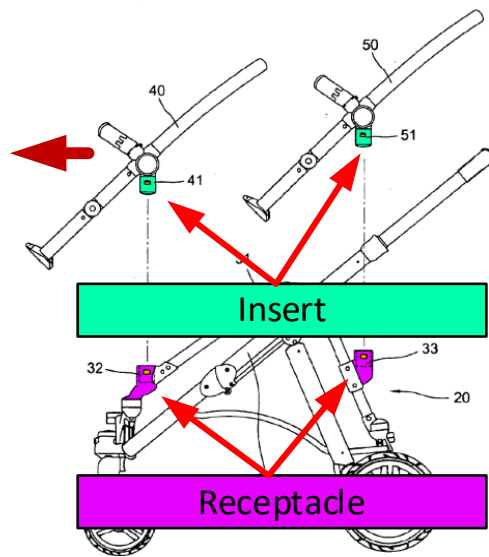


FIG. 5

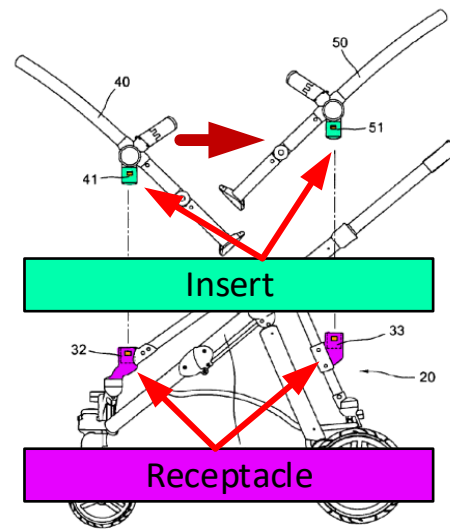


FIG. 11

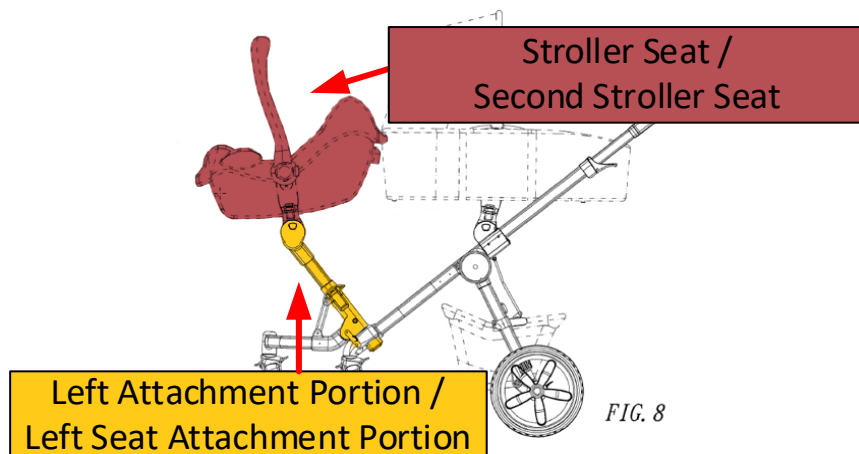
F. Claim 11

247. Liao in view of Chen discloses or renders obvious the elements of claim 11 for the same reasons that Liao disclosed or rendered obvious claim 11, as discussed *supra* § IX(I).

248. Chen also discloses the second seat is a stroller seat. (EX1065, ¶¶ 2-9, 21-26.) It would have been obvious to POSITA to use a stroller seat as a seat for a stroller. (*Id.*)

G. Claim 12

249. Liao in view of Chen discloses or renders obvious the elements of claim 12 for the same reasons that Liao disclosed or rendered obvious claim 12, as discussed *supra* § IX(J).



250. Furthermore, it would be obvious to a POSITA to use a bassinet or car seat as a stroller seat because bassinets and car seats that are attachable to strollers predate the earliest possible filing date of the '869 Patent, are well-known in the art, are obvious to try, and can be implemented successfully virtually 100% of the time.

H. Claim 13

251. Liao in view of Chen discloses or renders obvious the elements of claim 13 for the same reasons that Liao disclosed or rendered obvious claim 13, as discussed *supra* § IX(K).

I. Claim 14

252. Liao in view of Chen discloses or renders obvious the elements of claim 14 for the same reasons that Liao disclosed or rendered obvious claim 14, as discussed *supra* § IX(L).

J. Claim 15

253. Liao in view of Chen discloses or renders obvious the elements of claim

15 for the same reasons that Liao disclosed or rendered obvious claim 15, as discussed *supra* § IX(M).

K. Claim 16

254. Liao in view of Chen discloses or renders obvious the elements of claim 16 for the same reasons that Liao disclosed or rendered obvious claim 16, as discussed *supra* § IX(N).

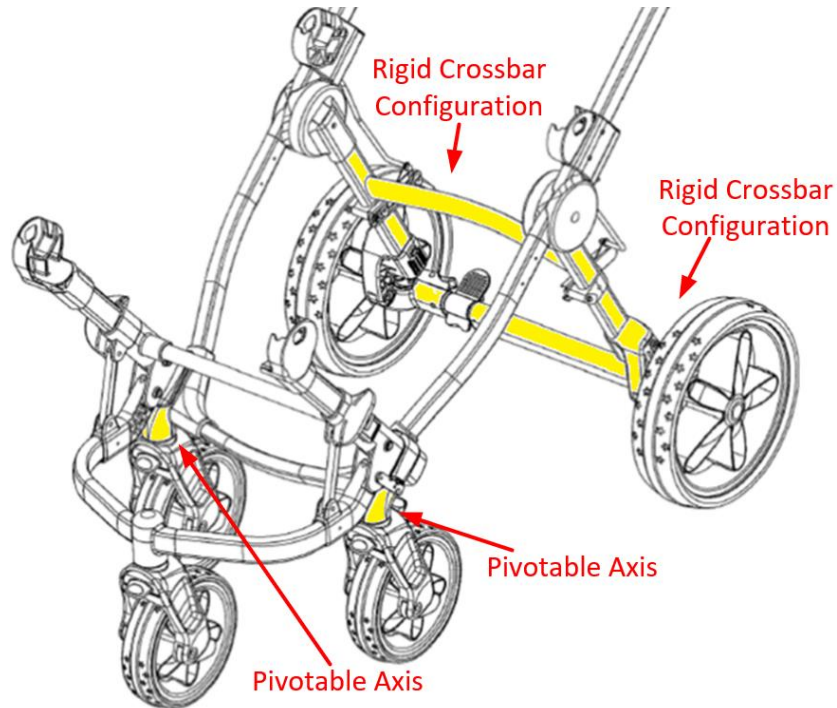
255. Chen also discloses, as shown in FIG. 6, front wheels on individual pivoting axes and the rear wheels on a rigid, rectangular frame. (EX1065, FIG. 6.) POSITA would therefore have understood, from visual inspection of Chen's figures, that Chen discloses front wheels that pivot and back wheels that are fixed. (*Id.*)

256. POSITA would have had a reasonable expectation of success combining Liao with Chen because both references disclose stroller systems that use conventional design components, and because integrating Chen's components and/or functionality into Liao would have been straight-forward use of known components and well within POSITA's skills.

257. Furthermore, it would have been obvious to POSITA to use pivoting front wheels and fixed rear wheels because this is a convenient and common arrangement to provide an easy to control stroller. Fixed rear wheels and pivoting front wheels were, prior to the filing date of the '869 Patent, a conventional design feature of strollers that would have been easy to implement. As a result, POSITA

would have had a reasonable expectation of success modifying the wheels of Liao to be fixed in the rear and pivoting in the front. (*Id.*)

258. Accordingly, it would have been obvious to POSITA that Liao in view of Chen discloses the elements of claim 16.



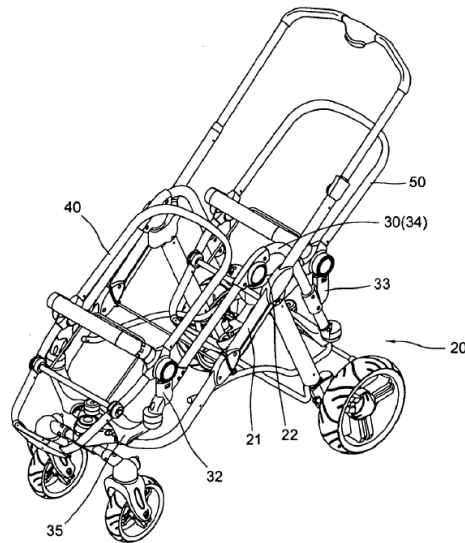
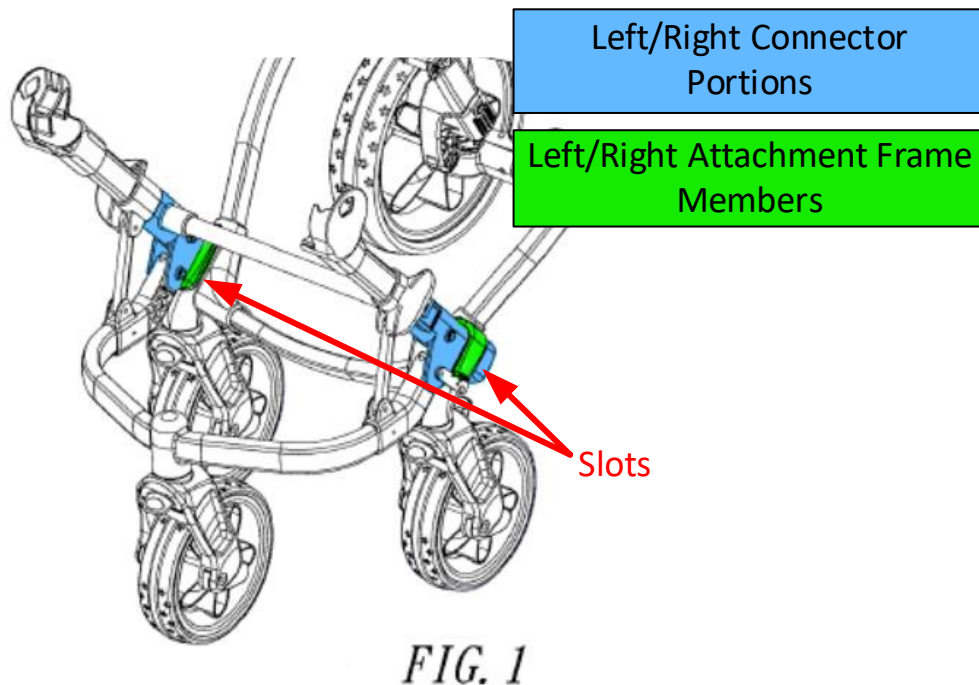


FIG. 6

L. Claim 17

259. Liao in view of Chen discloses or renders obvious the elements of claim 17 for the same reasons that Liao disclosed or rendered obvious claim 17, as discussed *supra* § IX(O).



M. Claims 18-23

260. Liao in view of Chen discloses or renders obvious the elements of claim 18-23 for the same reasons that Liao disclosed or rendered obvious claim 18-23, as discussed *supra* § IX(P)-(Q).

261. Furthermore, Chen discloses generally circular receptacle cups 32, 33, thus indicating that the connector portions (which would plug into the cups) and attachment frame members (the cups themselves) are circular and have a cooperating shape with one another. (EX1065, FIG. 7.) It would have been obvious to POSITA to use Chen's forward-backward facing capabilities which are based on the inserts and receptacles and which were incorporated into Liao as discussed with respect to claim 9, *supra* § X(E).

262. POSITA would have had a reasonable expectation of success combining Liao with Chen because both references disclose stroller systems that use conventional design components, and because integrating Chen's components and/or functionality into Liao would have been straight-forward use of known components and well within POSITA's skills.

263. Furthermore, to the extent Liao in view of Chen does not explicitly disclose any of these elements, POSITA would have been aware that cylindrical, circular, and tubular constructions, cross-sections, and slots, were typical, old, and well-known in the art long before the effective filing date of the '869 Patent. Accordingly, it would have been obvious to POSITA based on POSITA's general knowledge, and in view of common sense and as a design choice, to use cylindrical, circular, and/or tubular constructions, cross-sections, and/or slots for connector portions and receiver portions of the design of a stroller, the stroller's attachment frame members, and related accessories, such as the seat attachment and/or connector portion. POSITA would have reasonably expected success using common sense and general knowledge to modify Liao in view of Chen because using cylindrical, circular, tubular, or complementary components would be the straightforward use of conventional components and well-within POSITA's skills.

264. Accordingly, it would have been obvious to POSITA that Liao in view of Chen discloses the elements of claims 18-23.

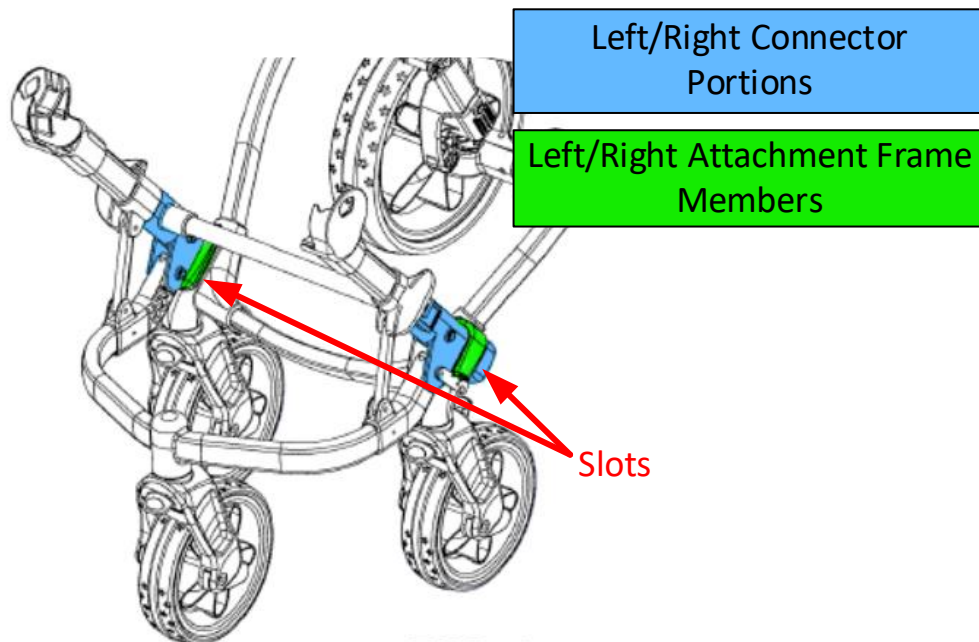


FIG. 1

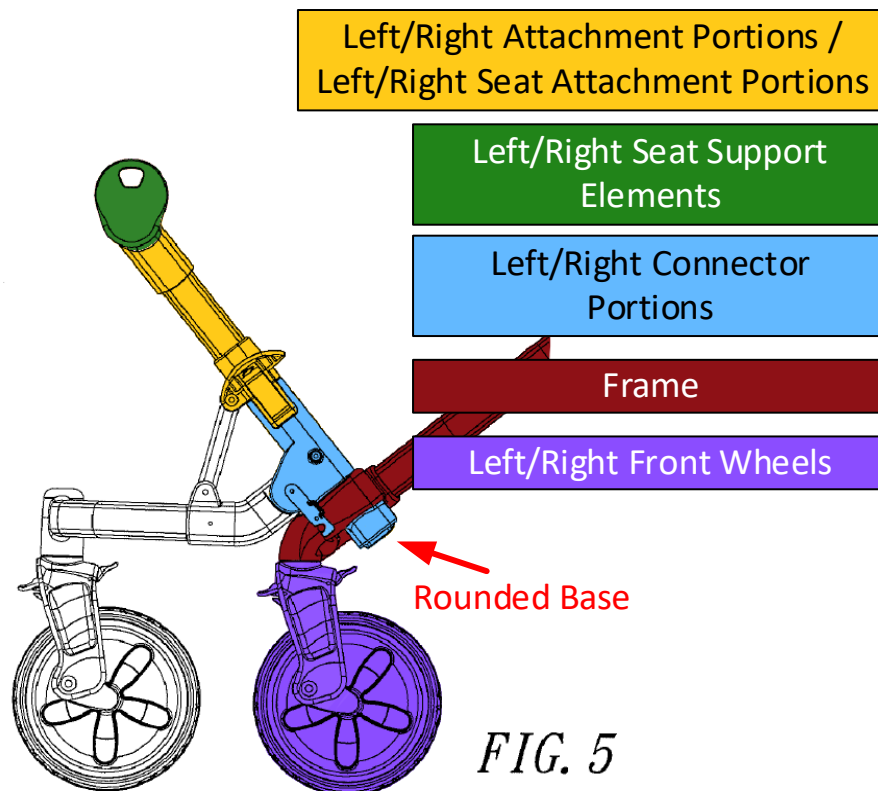
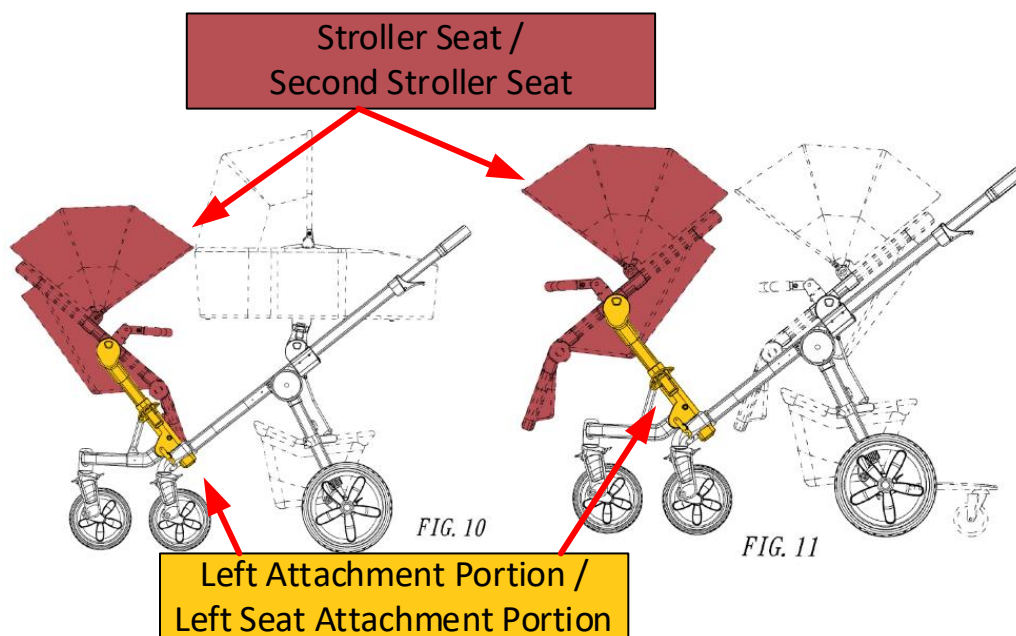


FIG. 5

N. Claim 29

265. Liao in view of Chen discloses or renders obvious the elements of claim 29 for the same reasons that Liao disclosed or rendered obvious claim 29, as discussed *supra* § IX(R).

266. More generally, the claimed elements would be obvious to a POSITA because virtually all strollers that have two seat supports situated on left and right sides of the stroller will require that the seat be at least partially between the supports.



O. Claim 30

267. Liao in view of Chen discloses or renders obvious the elements of claim 30 for the same reasons that Liao disclosed or rendered obvious claim 30, as discussed *supra* § IX(S).

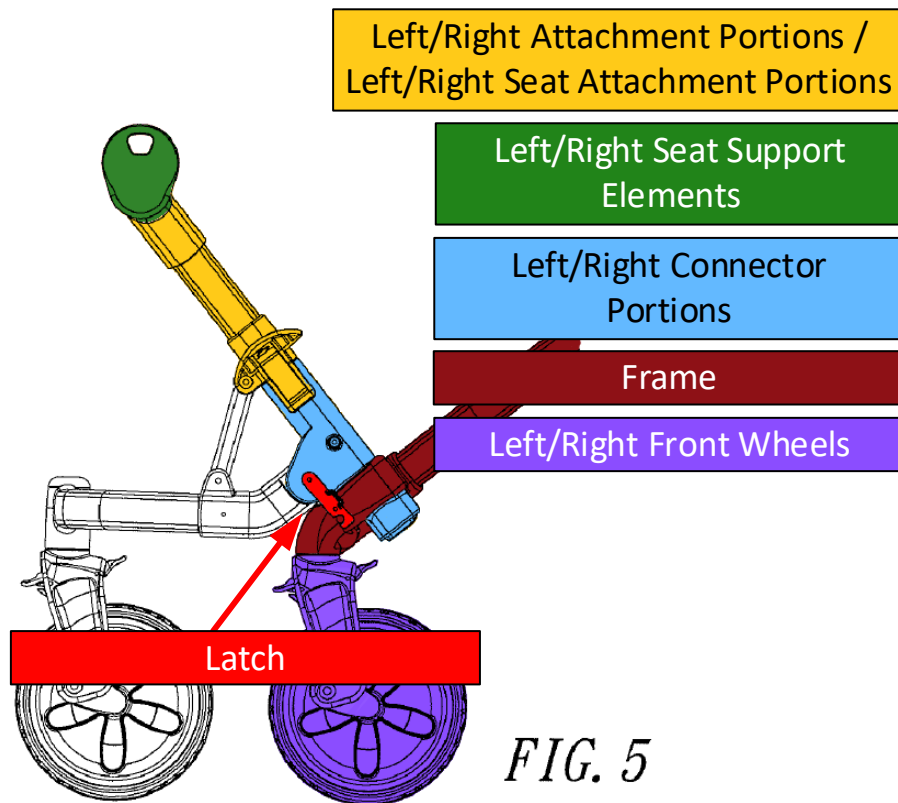


FIG. 5

XI. GROUND 3 — STOPP

268. Stopp discloses or renders obvious claims 1-30.

A. Independent Claims 1 & 24

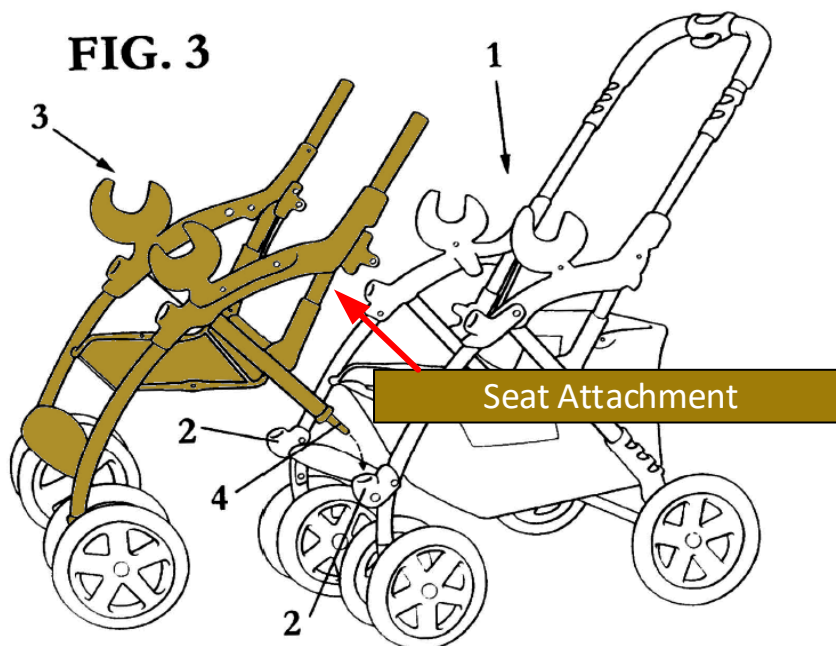
1 (Pre), 24(Pre)	A seat attachment for a stroller, comprising:	A seat attachment for a stroller, comprising:
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269. Stopp discloses a seat attachment for a stroller. (EX1063, col. 2:1-34.).

This functionality is shown in FIGS. 3 and 4 of Stopp. (*Id.*, FIGS. 3, 4.)

270. The seat attachment is coupled to the stroller when the rods (4) of the seat attachment (3) are placed into the bushings (2) of the stroller (1). Stopp indicates that the remaining elements of the strollers are conventional. (*Id.*, col. 2:1-20.)

271. Accordingly, Stopp discloses limitations [1(Pre)]/[24(Pre)].

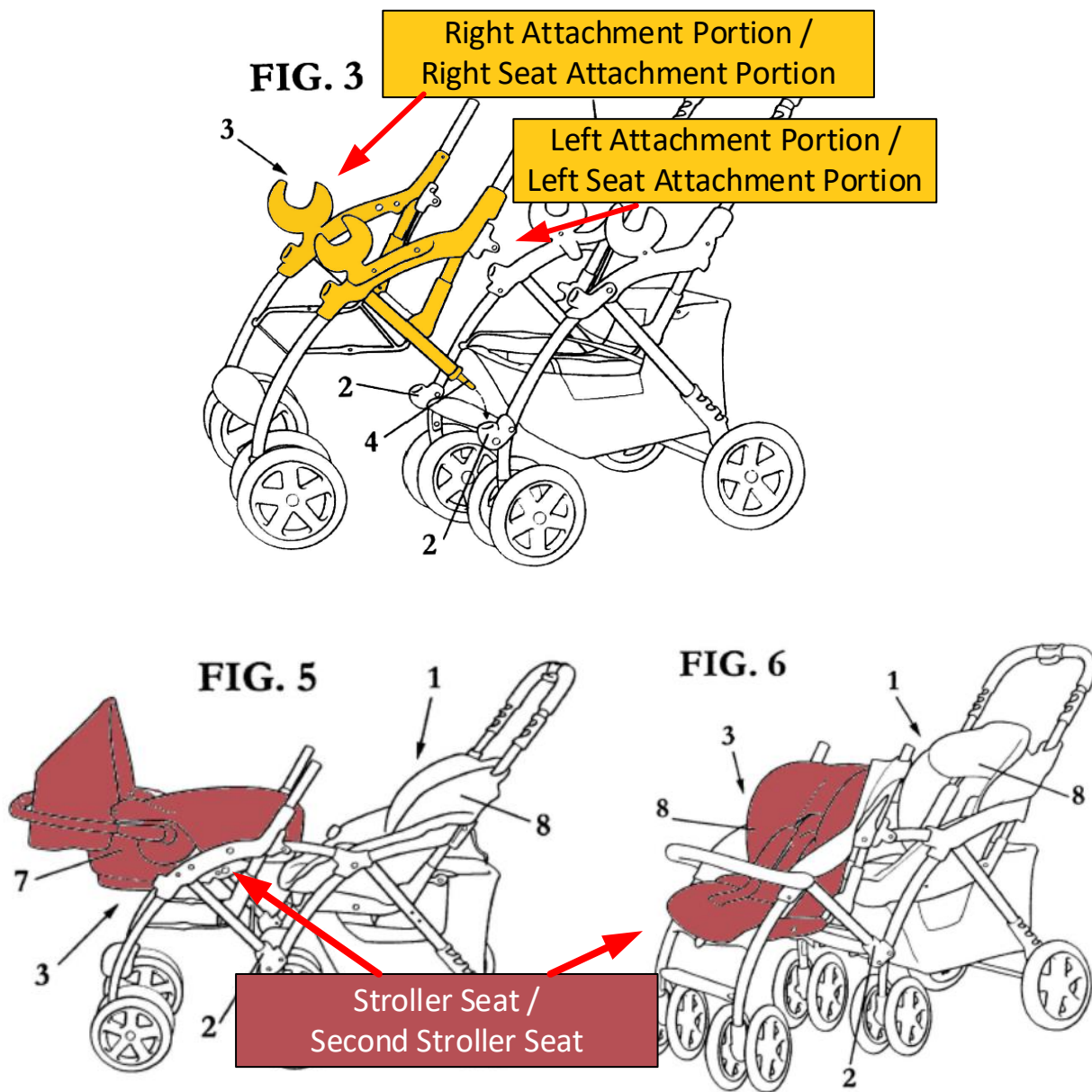


1(a), 24(a)	a separate left attachment portion, wherein the left attachment portion comprises:	a left seat attachment portion, wherein the left seat attachment portion comprises:
----------------	--	---

272. As shown in Figures 2 and 3, Stopp's seat attachment discloses left and right attachment portions and the left attachment portion is separate from the right attachment portion, as shown below. The left attachment also includes one rod of the pair of rods (4) of the seat attachment (3), as well as elements for supporting seats (shown in FIGS. 5 and 6 supporting different kinds of seats). (EX1063, col. 2:1-31, FIGS. 5, 6.). An identical right-side attachment portion is present as well, due to Stopp's frame symmetry. (*Id.*)

273. Additionally, because Stopp's left/right attachment portions connect to and support different kinds of seats (including a stroller seat), each attachment portion constitutes a "seat attachment portion" as recited in limitation [24(a)]. (*Id.*)

274. Accordingly, Stopp discloses [1(a)]/[24(a)].



1(b), 24(b)	a connector portion capable of removably connecting to a stroller frame adjacent a left front wheel of the stroller and a left seat support element removably connecting a seat in either a forward or backward position; and	a connector portion capable of removably connecting to a stroller frame adjacent a left front wheel and a left seat support element removably connecting a seat in either a forward or backward position; and
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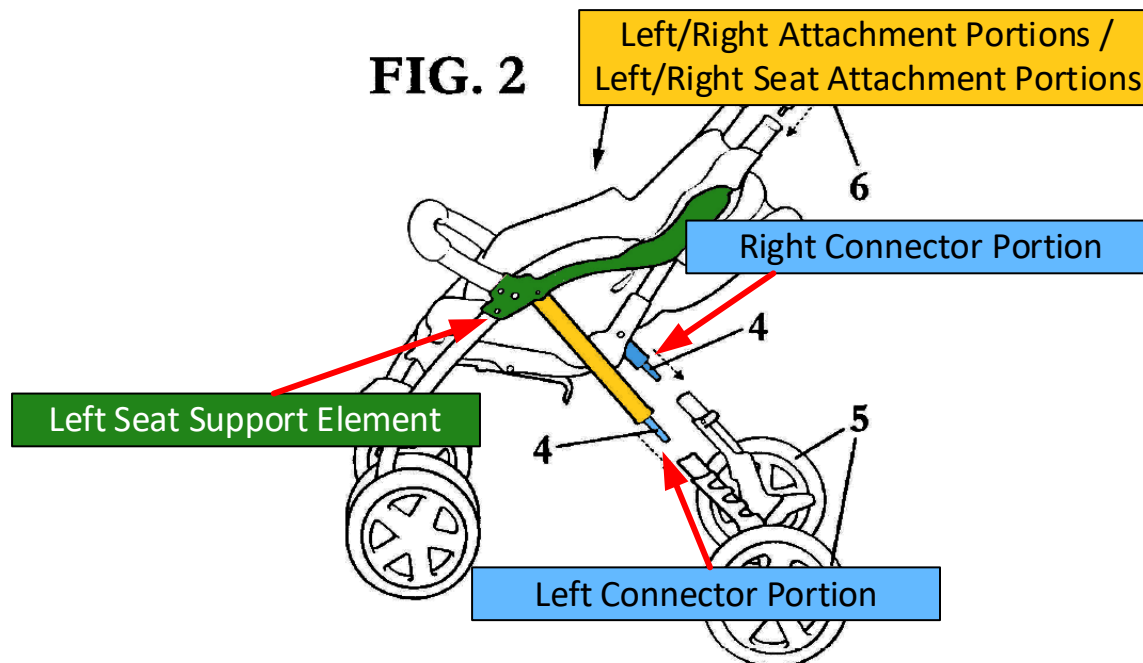
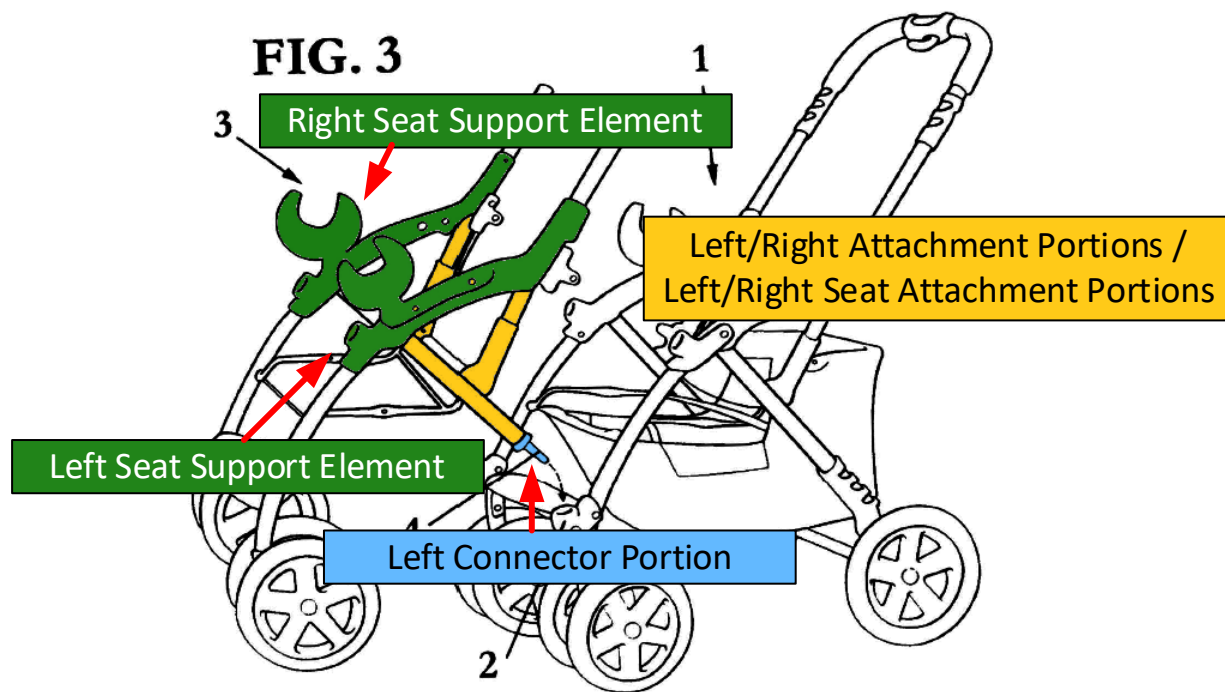
275. Each (seat) attachment portion of Stopp's seat attachment discloses and

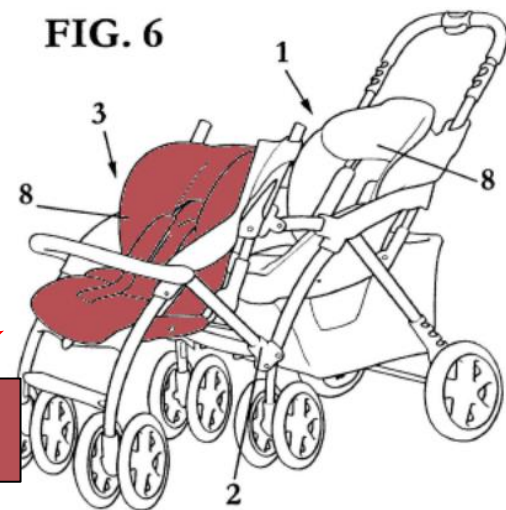
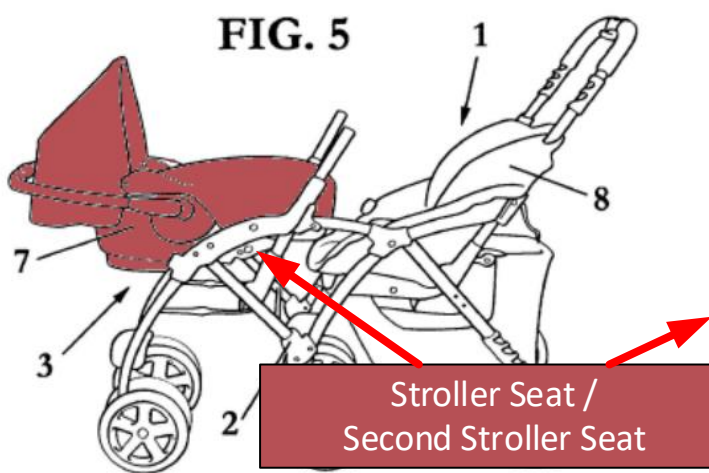
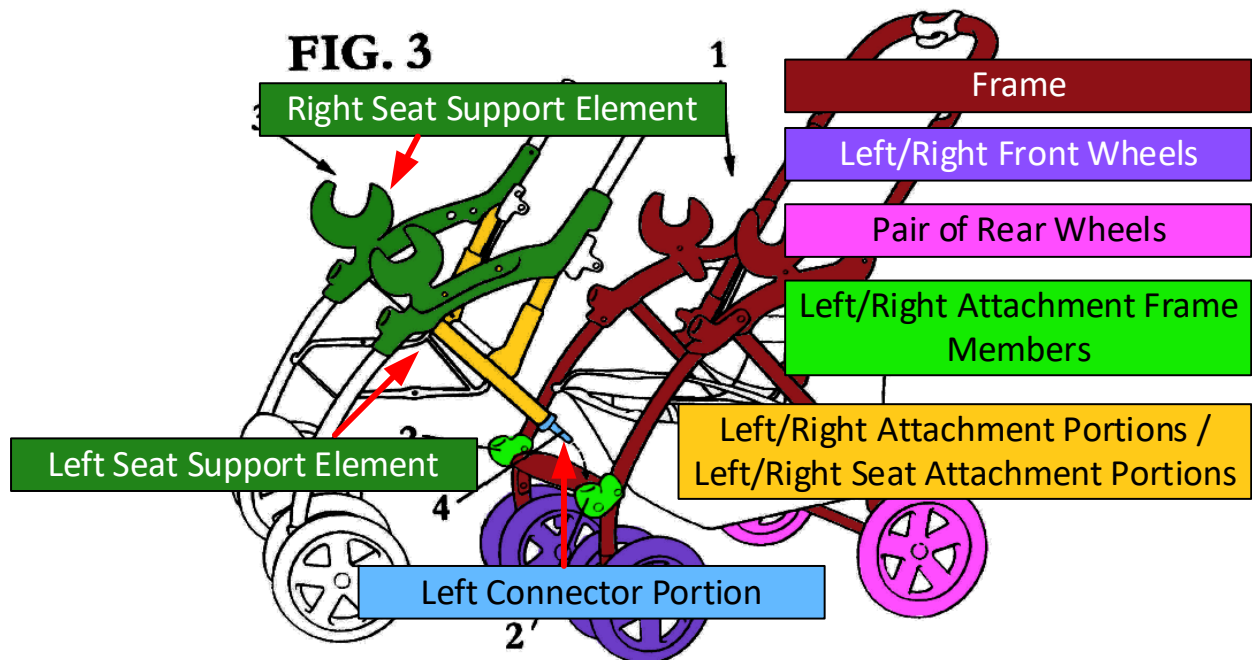
includes a connector portion, labeled below, that removably connects to a stroller frame adjacent a left front wheel, and a left seat support element (also labeled below) that removably connects a seat in either a forward or backward position, as shown below in Figures 2, 3, 5, and 6. (EX. 1063, col. 2:1-34, FIGS. 2-5, 6.) The (left) connector portion is the rod (4) of the pair of rods (4) associated with the left-side which inserts into the bushing (2) on the left-side of the stroller. (*Id.*) The left seat support element is the top “crab-claw” feature illustrated in Figures 2 and 3 in conjunction with the associated “arm” part (which is capable of supporting a seat, carrycot, and so forth, as shown in FIG. 5). (*Id.*) Finally, as Figures 5 and 6 illustrate, the seat removably connects to the seat attachment and can be oriented in a forward or backward position. (*Id.*)

276. Furthermore, POSITA would have understood that Stopp’s seat support elements and the overall seat connections are conventional, well-known, and that the coupling mechanism between the seat and the seat support element is a conventional connector designed to allow the seat to be easily removed and connected. (*Id.*) POSITA would have understood that various types of seats can be used with the frame at various times, and that each of the various types of seats are removable. Moreover, to the extent that Stopp does not show that the various types of seats can be oriented in a forward or backward position, a POSITA would have understood that reversible seat connections that permit the same seat to face both forward and

backward are conventional elements that are old and well-known in the art. Accordingly, POSITA would have known to integrate connection mechanisms permitting the same seat to face both forward and backward in the stroller disclosed in Stopp because POSITA would have known that it is convenient to be able to arrange the passengers as desired, that many parents enjoy being able to selectively seat their child facing backwards so that they can see their children while pushing the stroller (e.g., to better monitor their children), and that other times it is desirable to face a baby in a forward configuration so that it can see outward. POSITA would have had a reasonable expectation of success integrating such a connection mechanism into the stroller disclosed in Stopp because such mechanisms are conventional and integrating them into Stopp would be a simple task well-within POSITA's skill.

277. Therefore, Stopp discloses [1(b)]/[24(b)] or, alternatively, renders it obvious.





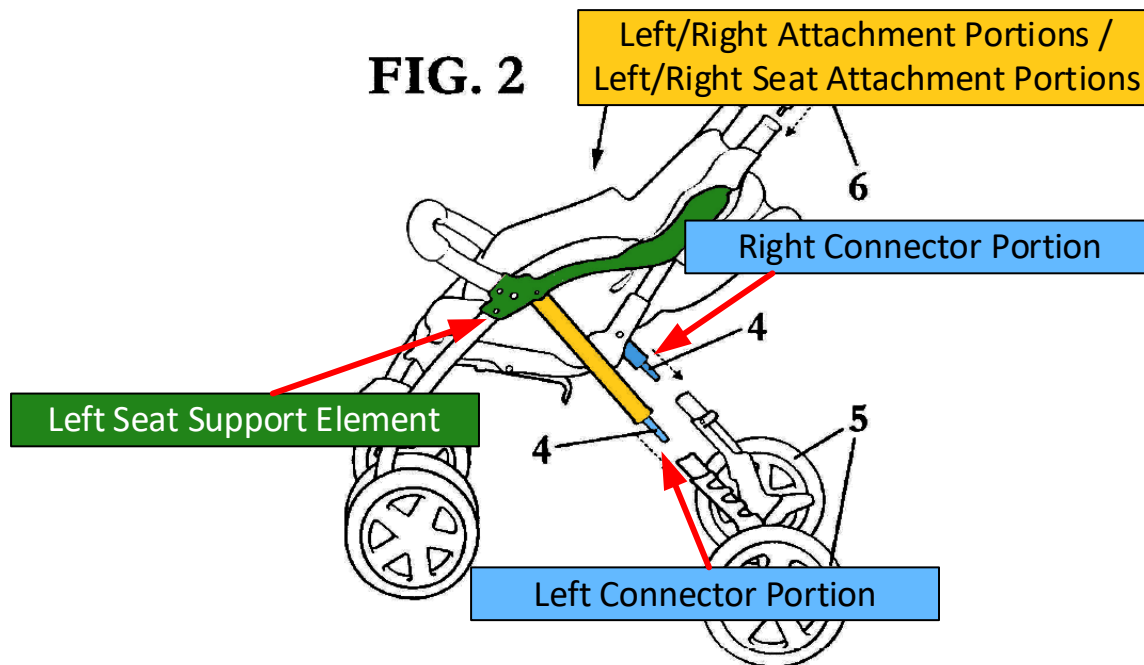
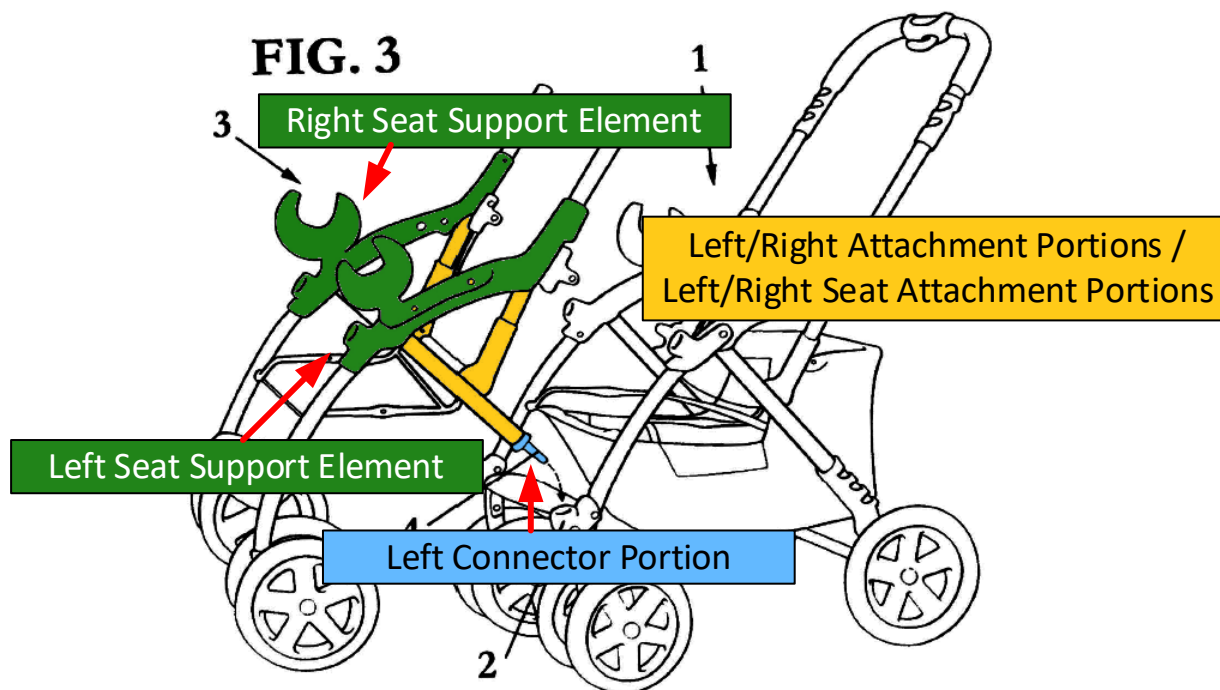
1(c), 24(c)	a separate right attachment portion, wherein the right attachment portion comprises:	a right seat attachment portion, wherein the right seat attachment portion comprises:
1(d), 24(d)	a connector portion capable of removably connecting to a stroller frame adjacent a right front wheel of	a connector portion capable of removably connecting to the stroller frame adjacent a right

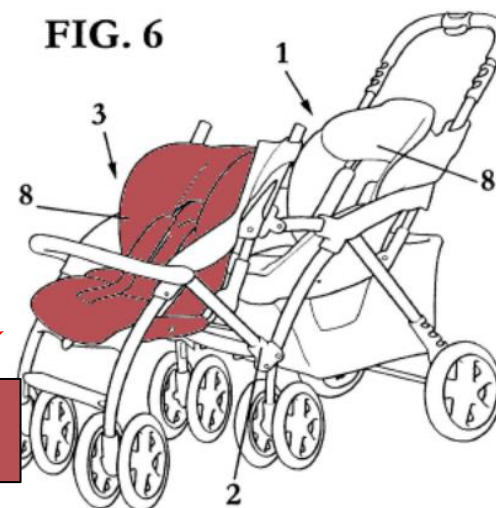
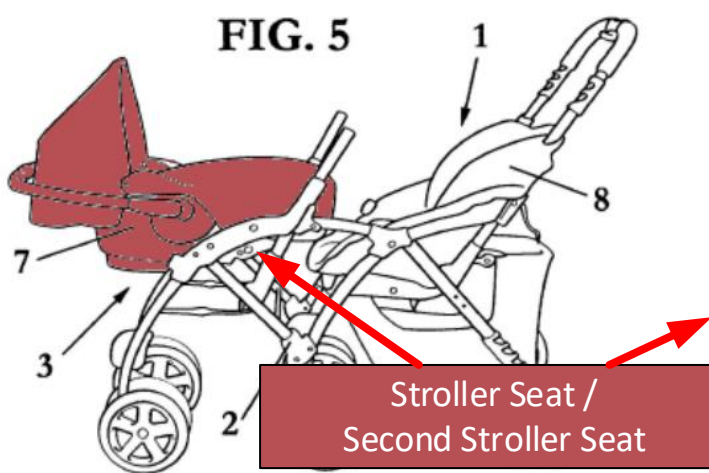
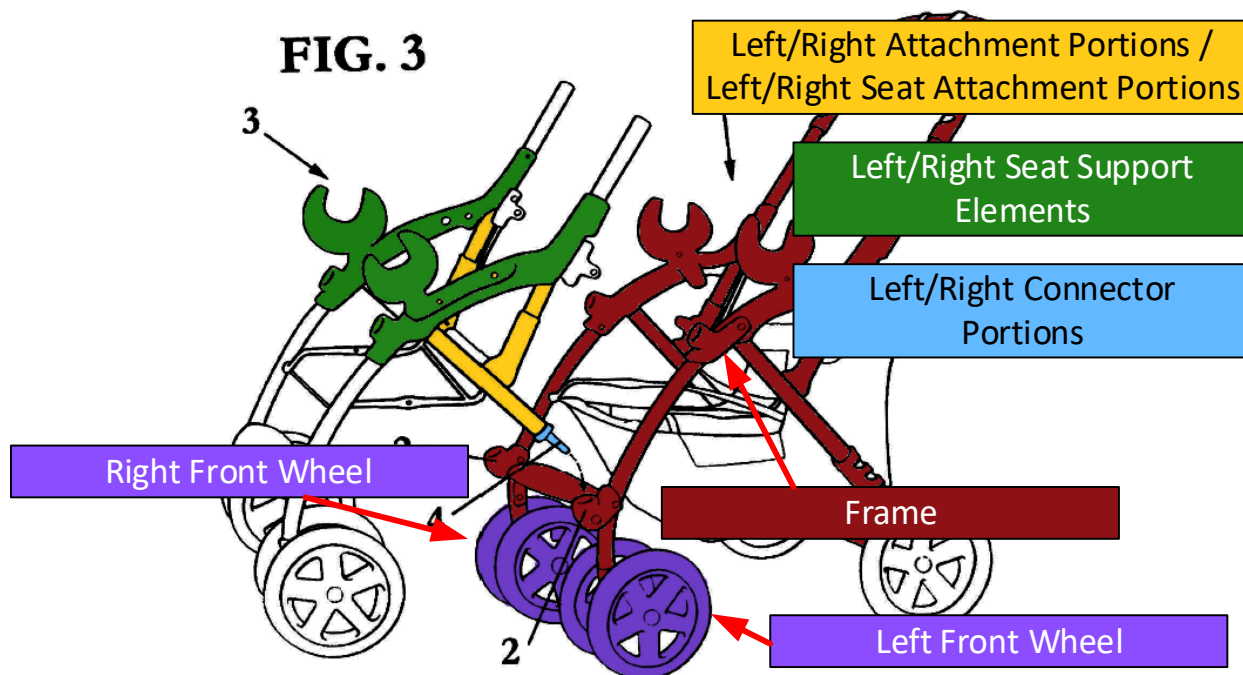
	the stroller and a right seat support element removably connecting the seat in either a forward or backward position between the left and right support elements.	front wheel and a right seat support element removably connecting the seat in either a forward or backward position between the left and right seat support elements.
--	---	---

278. Stopp's stroller has left-right symmetry. (EX1063, FIGS. 1-6.) As illustrated in the Figures below, the right side of Stopp's seat attachment mirrors all the features discussed above that the left side possesses, and the right-side attachment portion is identical to the left-side attachment portion. (*Id.*, col.2:1-20.) Therefore, Stopp discloses, or, alternatively, renders obvious the right-sided features recited in [1(c)-(d)]/[24(c)-(d)], for the same reasons discussed above in connection with the left side.

279. Additionally, as shown in Figures 1-6, the seat is disclosed positioned between the left and right seat support elements. (*Id.*, FIGS. 1-6.)

280. As a result, Stopp discloses all limitations of [1(c)-(d)]/[24(c)-(d)] or, alternatively, renders them obvious.





B. Claims 2 & 25

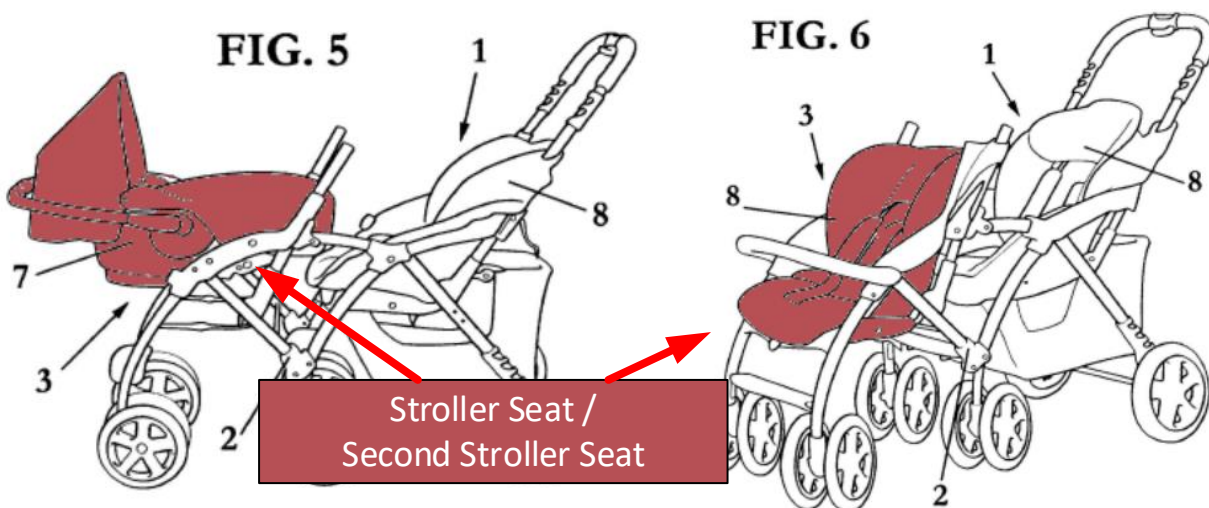
2, 25	The seat attachment for a stroller of claim 1, wherein the seat is a baby seat, a car seat, a stroller seat, a bassinet, or a pram.	The seat attachment for a stroller of claim 24, wherein the seat is a baby seat, a car seat, a stroller
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		seat, a bassinet, a baby carrier, or a pram.
--	--	--

281. Stopp discloses that the seat may be a bassinet or a stroller seat as illustrated in Figures 5 and 6. (EX1063, col. 2:40-47, FIGS. 5, 6.). Stopp further discloses that the stroller can use various other seats and carrycots, as examples.

(*Id.*)

282. Accordingly, Stopp discloses the additional limitations of claims 2 and 25.



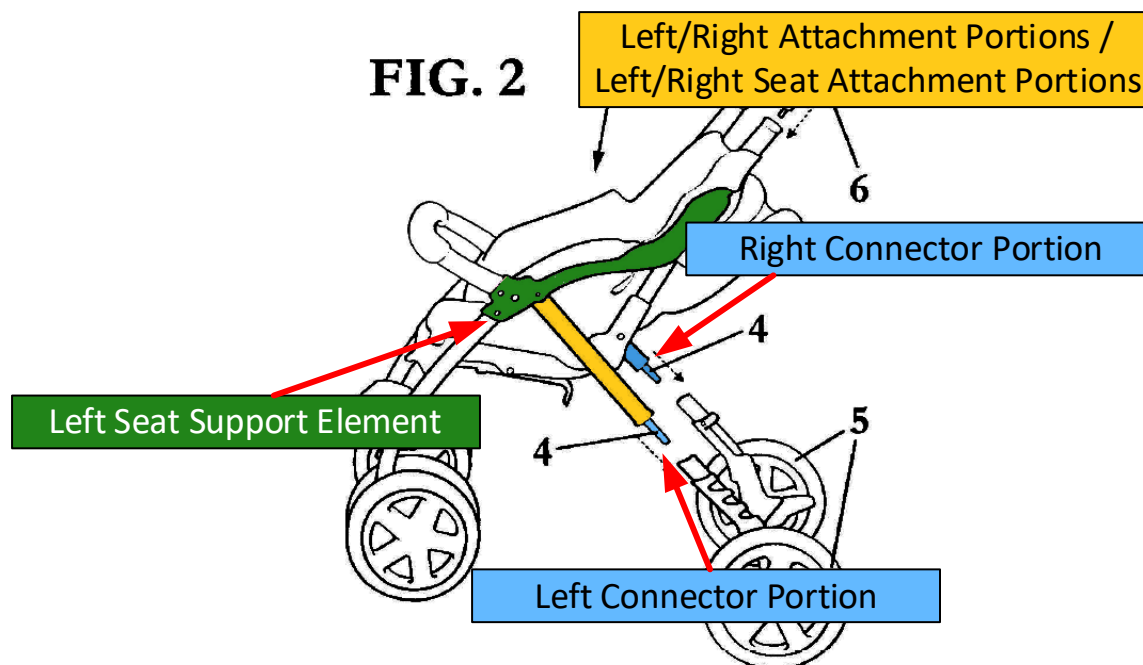
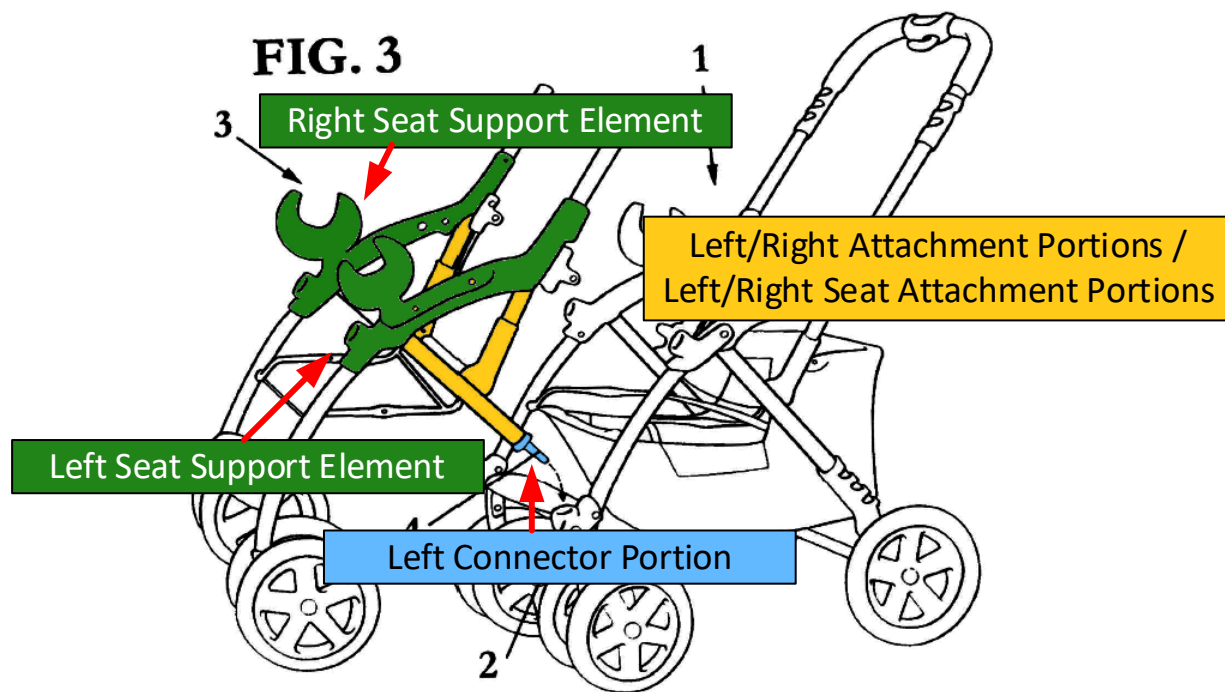
C. Claims 3-5, 26-28

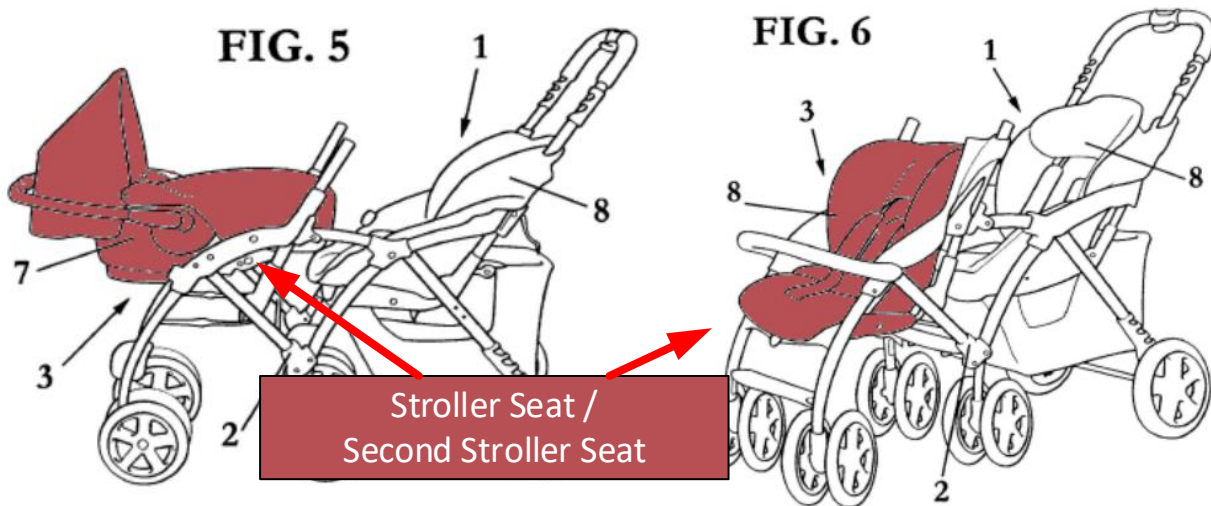
3, 26	The seat attachment for a stroller of claim 1, wherein each attachment portion has a first end and a second end.	The seat attachment for a stroller of claim 24, wherein each of the left and right seat attachment portions has a first end and a second end.
4, 27	The seat attachment for a stroller of claim 3, wherein the first end is	The seat attachment for a stroller of claim 26, wherein the first end

	capable of connecting to the stroller frame.	is capable of directly connecting to a stroller frame.
5, 28	The seat attachment for a stroller of claim 4, wherein the second end is connected to the seat.	The seat attachment for a stroller of claim 27 , wherein the second end is connected to the seat.

283. Stopp discloses each attachment portion having first and second ends, and discloses that the first end (the connector portion) is capable of connecting to the stroller frame, and the second end (the seat attachment portion) is connected to a seat. (EX1063, col. 2:1-34, FIGS. 3, 5, 6.) FIGS. 3, 5, and 6 show the stroller without seats and with seats of different types, indicating the removability of the seats. (*Id.*)

284. Accordingly, Stopp discloses the additional limitations of claims 3-5 and 25-27.



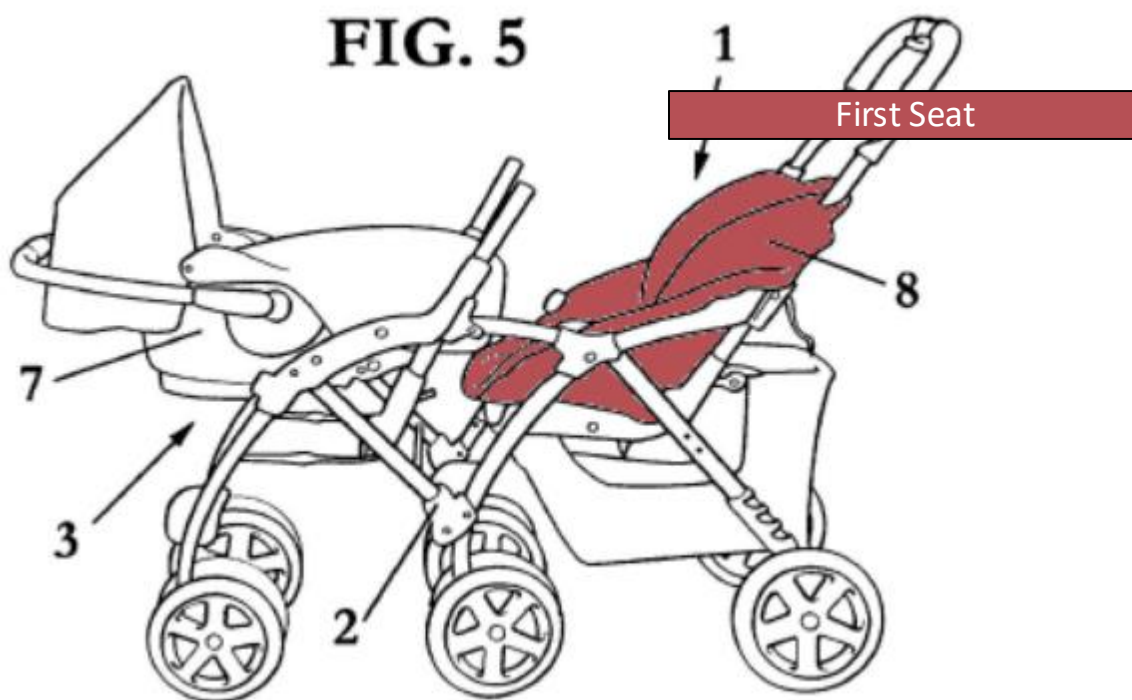
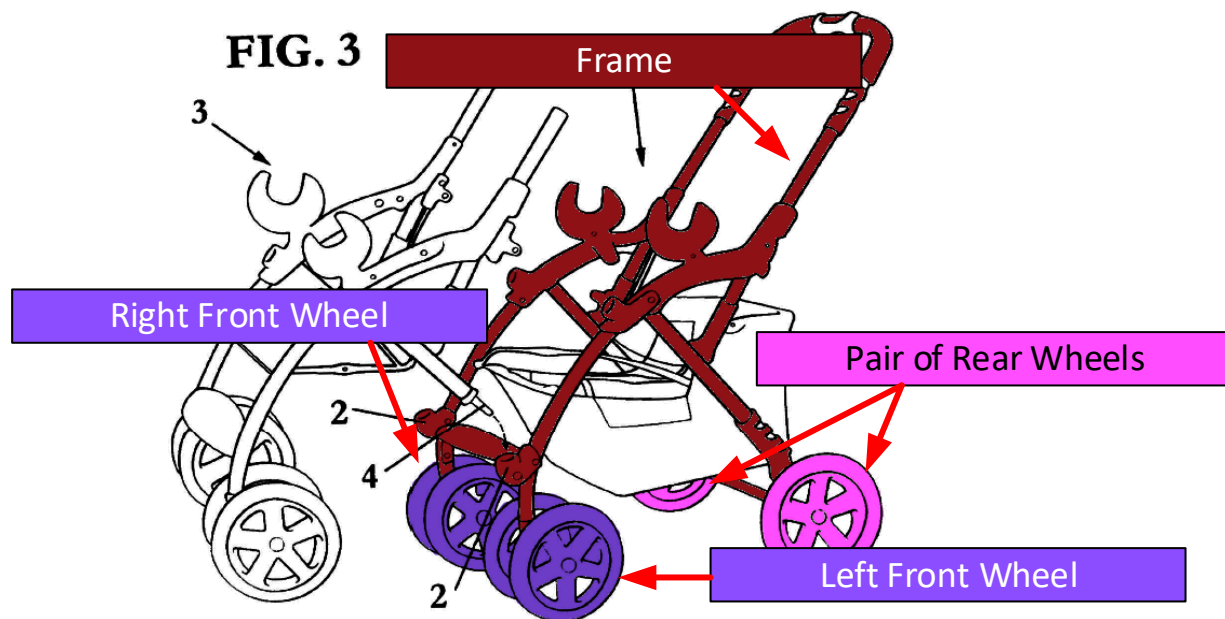


D. Independent Claim 6

6(Pre)	A stroller, comprising:
6(a)	a frame;
6(b)	two front wheels;
6(c)	at least one rear wheel;
6(d)	a stroller seat; and

285. As shown in Figures 3, and 5-6, Stopp discloses a stroller having a frame, two front wheels, at least one rear wheel, and a stroller seat, as labeled below.
 (EX1063, col. 2:1-34, FIGS. 3, 5, 6.)

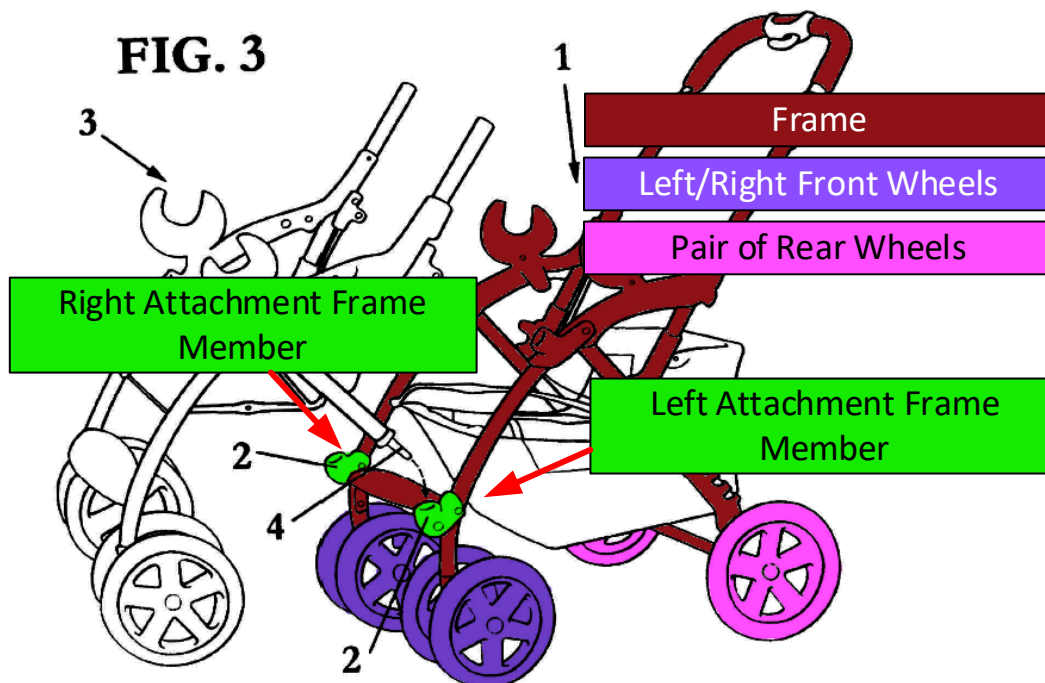
286. Accordingly, Stopp discloses [6(Pre)-(d)].



6(e)	two attachment frame members connected to the frame adjacent to the front wheels,
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287. Stopp discloses two attachment frame members, one on the left and the other on the right, both adjacent to the respective left and right front wheels, as illustrated and labeled below. The attachment frame members are illustrated as the bushings (2) of FIG. 3, which are configured to receive the rods (4) of the seat attachment. (EX1063, col. 2:1-34, FIG. 3.)

288. Therefore, Stopp discloses limitation [6(e)].

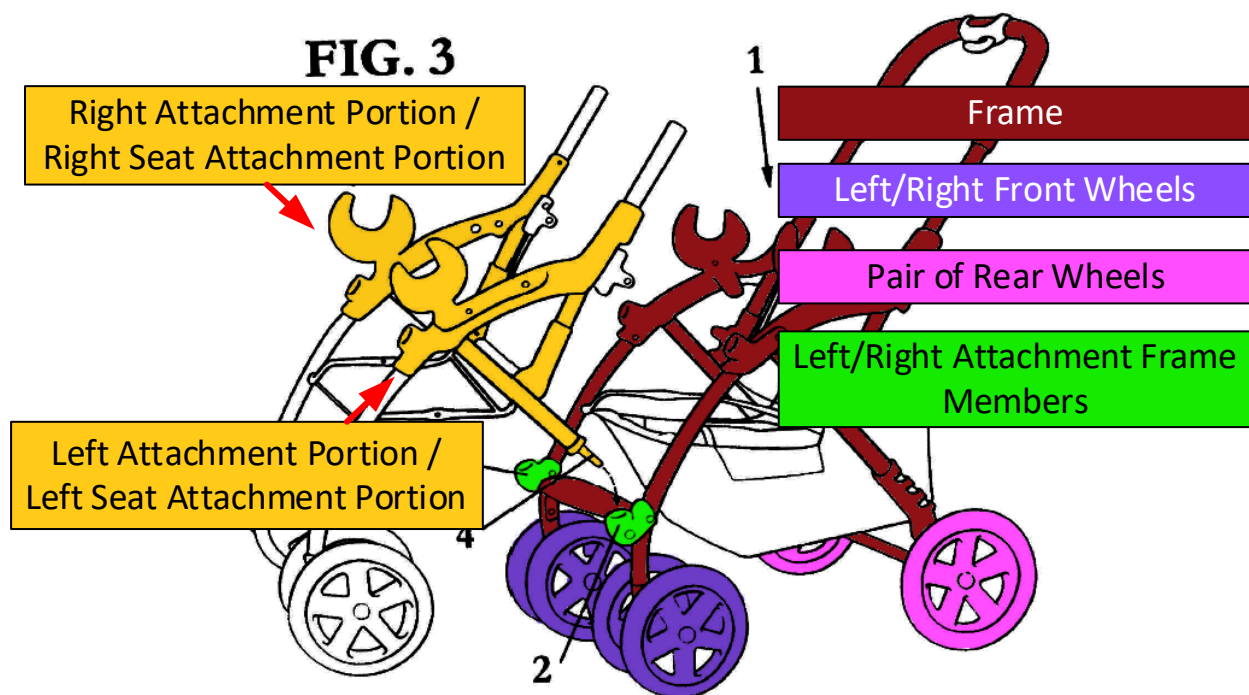


6(f)	wherein the attachment frame members are capable of removably receiving and supporting separate right and left seat attachment portions,
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289. Stopp discloses that the attachment frame members receive and support

separate left and right seat attachment portions. Specifically, as illustrated in Figures 3 and 5 below, the bushings (2) receive the rods (4) of the separate left and right side attachment portions and secure them thereto, thereby supporting the seat attachment (3) and allowing it to be used as a double stroller. (EX1063, col. 2:1-30, FIG. 3.)

290. Therefore, Stopp discloses limitation [6(f)].

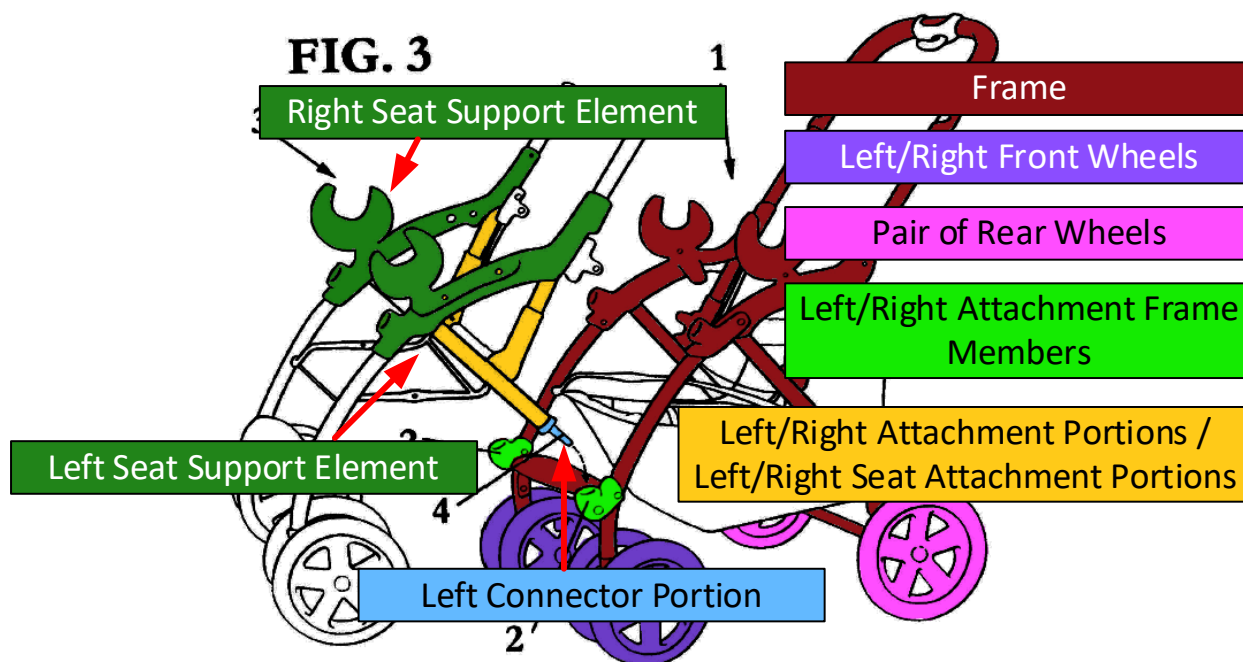


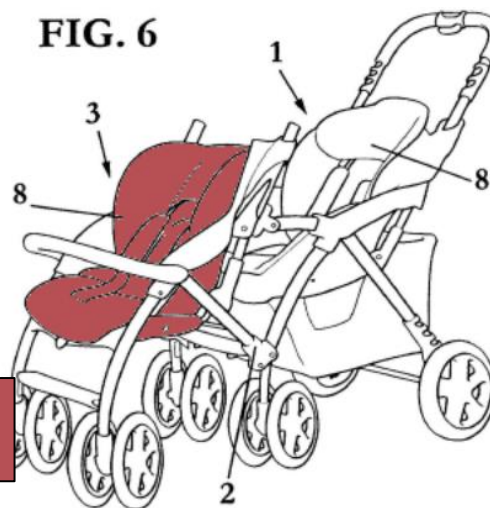
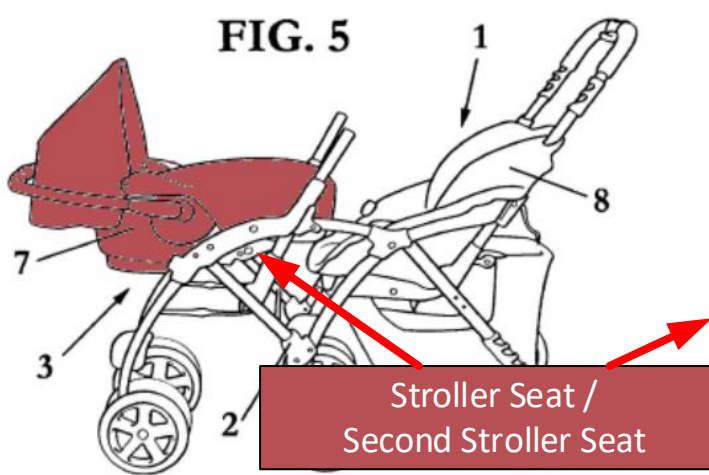
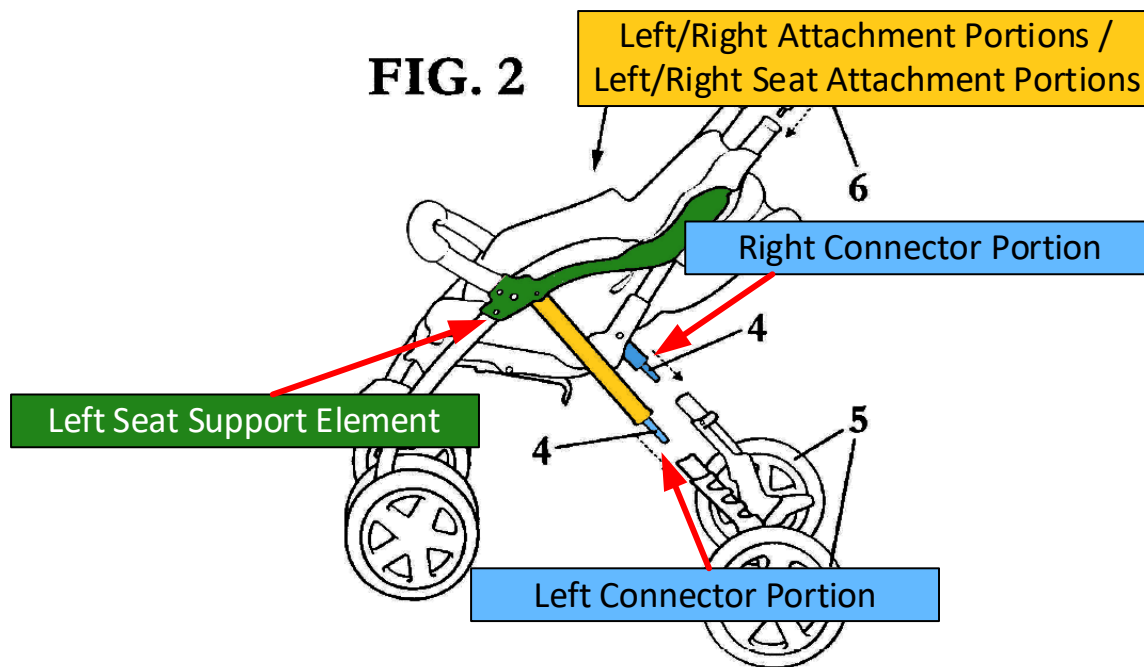
6(g)	wherein each of the seat attachment portions comprises a connector portion for removably connecting to the attachment frame member and a seat support element for removably connecting a stroller seat between the seat attachment portions.
------	--

291. As illustrated in Figures 2-3, Stopp discloses that the separate seat attachment portions each have a connector portion, and a seat support element, which removably connects a stroller seat between the two seat attachment portions

(also shown in Figures 5-6). (EX1063, FIGS. 2, 3, 5, 6.) In particular, each connector portion is disclosed as being a respective rod (4) of the pair of rods (4), which each nest in a corresponding bushing (2). The seat support element is disclosed as being the “claw” and arm part of the seat attachment portion, as shown in Figures 2 and 5, and is depicted supporting a seat that can face forward or rearward between the two seat attachment portions. FIG. 2 also better shows the right-side rod (4), which is not illustrated in FIGS. 5 and 6. (*Id.* col. 2:1-34.)

292. Accordingly, Stopp discloses, or alternatively renders obvious, limitation [6(g)].





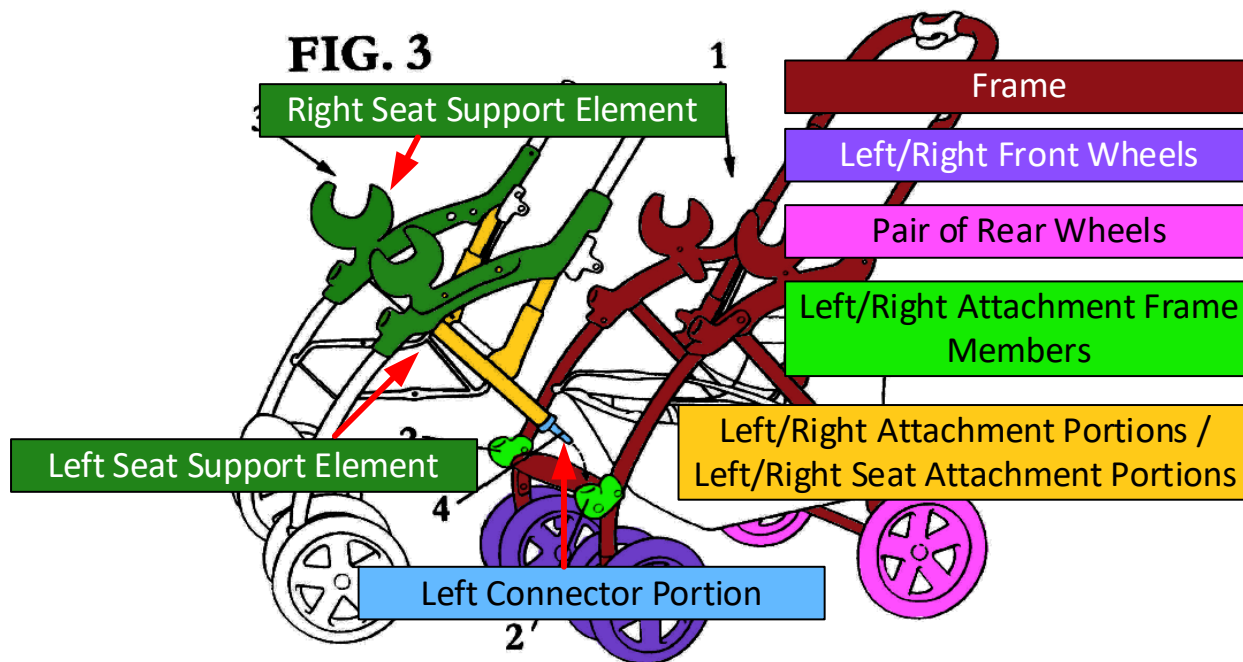
E. Claim 7

7	The stroller of claim 6, wherein the attachment frame members comprise a slot for removably receiving the connector portion of the seat attachment portion.
---	---

293. As shown below in FIG. 3, the attachment frame members disclosed in

Stopp include slots for removably receiving the connector portion of the seat attachment portion. (EX1063, col. 2:20-34, FIGS. 1-3.). In particular, Stopp discloses that the bushings (2) of the attachment frame member include slots or sockets, and, as shown in FIG. 3, each slot is generally of a round or circular shape that matches the shape of the rods (4) (or connector portions of the seat attachment portions) and removably receives each therein. (*Id.*)

294. Accordingly, Stopp discloses, or alternatively renders obvious, the additional limitations of claim 7.

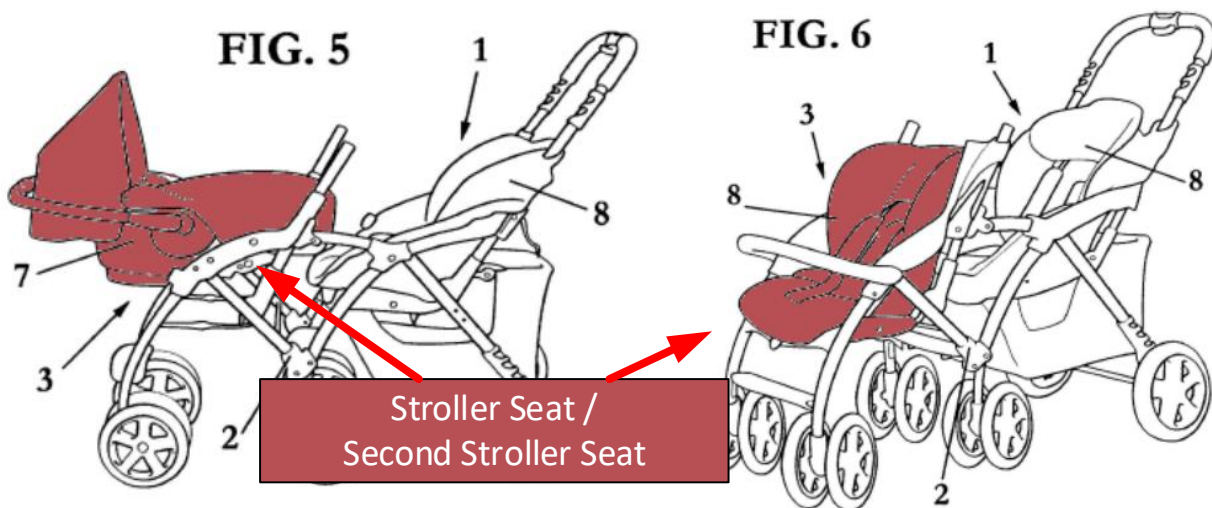


F. Claim 8

8	The stroller of claim 6, wherein the frame of the stroller is capable of supporting a second seat and the second seat is selected from a stroller seat, an infant carrier, a bassinet, a pram, or a car seat.
---	---

295. Stopp, as shown in FIGS. 5 and 6, discloses that the frame of the stroller is capable of supporting a second seat that is selected from stroller seats, infant carriers, bassinets, prams, and car seats. (EX1063, col. 2:40-44, FIGS. 5, 6.)

296. Accordingly, Stopp discloses the additional limitations of claim 8.



G. Independent Claim 9

9 (Pre)	A stroller, comprising:
9 (a)	a first stroller seat reversibly and removably connected to a stroller frame having a left front wheel and a right front wheel;

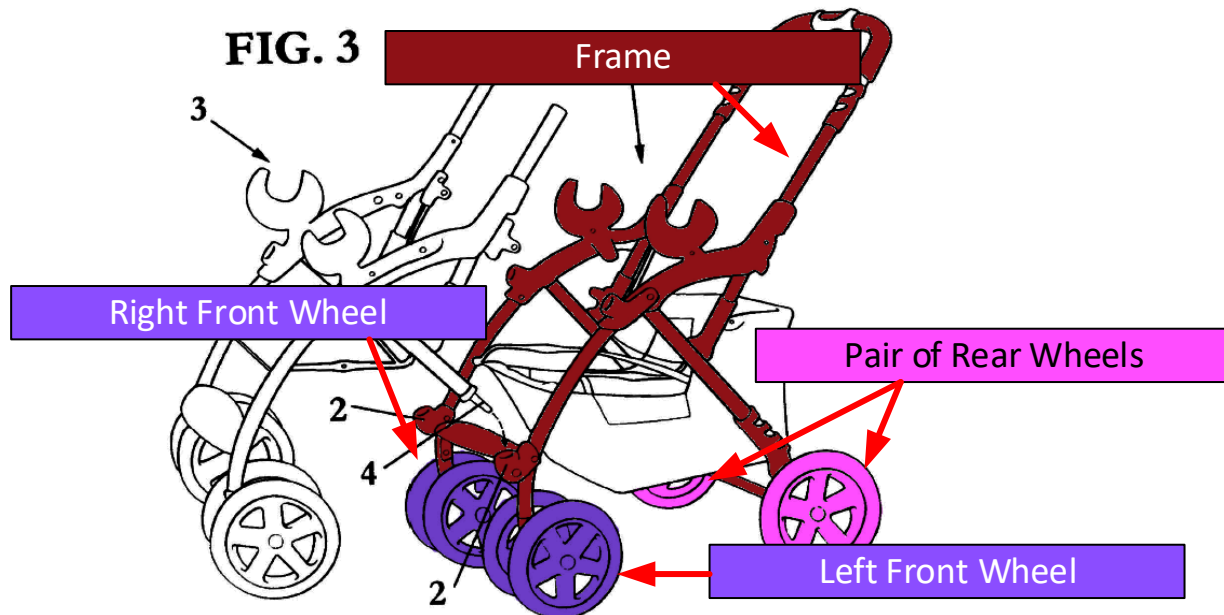
297. As shown in Figures 1-6, Stopp discloses a stroller with a seat reversibly and removably connected to the stroller frame, as well as left and right front wheels. (EX1063, col. 2:1-34, FIGS. 1-6.) Stopp specifically discloses that the strollers are conventionally constructed except for the connection mechanisms for

adding a second seat to the frame. (EX1063, col. 2:1-20.) Thus, a POSITA would therefore have understood that Stopp teaches that any of the seats disclosed therein, including both the rear (first) and front (second) seats may face forward or backward. (*Id.*)

298. Furthermore, POSITA would have understood that Stopp's seat connections are conventional. (*Id.*, col. 2:1-20.) Moreover, to the extent that Stopp does not expressly disclose that the various types of seats shown therein can be oriented in a reversible, forward or backward position, a POSITA would have understood that reversible seat connections that permit the same seat to face both forward and backward were conventional elements at the time of the invention and were well-known in the art. Accordingly, POSITA would have desired to integrate connection mechanisms permitting the same seat to face both forward and backward in the stroller disclosed in Stopp because POSITA would have known that it is convenient to be able to arrange the passengers as desired, that many parents enjoy being able to selectively seat their child facing backwards so that they can see their children while pushing the stroller (e.g., to better monitor their children), and that other times it is desirable to face a baby in a forward configuration so that it can see outward. POSITA would have had a reasonable expectation of success integrating such a connection mechanism into the stroller disclosed in Stopp because such mechanisms are conventional and integrating them into Stopp would be a simple

task well-within POSITA's skill.

299. Accordingly, Stopp discloses, or alternatively, renders obvious limitations [9(Pre)-9(a)].

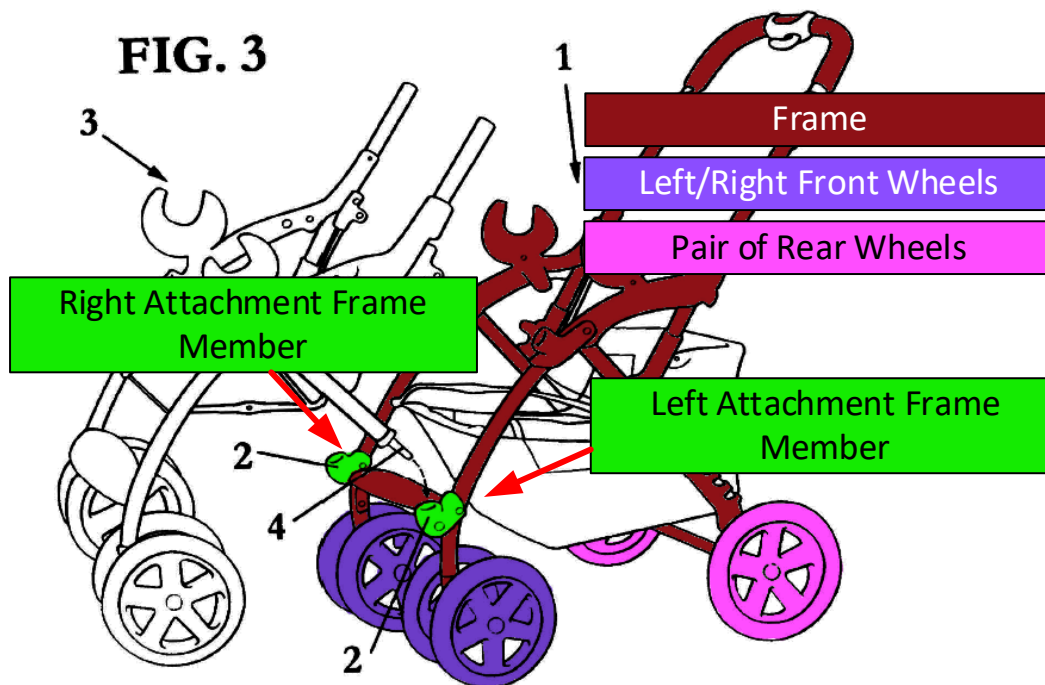


9 (b)	two attachment frame members attached to the stroller frame,
9 (c)	wherein one attachment frame member is connected adjacent to the left front wheel and the other attachment frame member is connected adjacent to the right front wheel, and

300. Stopp discloses, as shown in FIG. 3, two (one left and one right) attachment frame members attached to the stroller frame and located adjacent the respective front wheels. (EX1063, FIG. 3.) In particular, Stopp discloses the attachment frame members connecting to the stroller frame at the bushings (2), which are configured to receive the rods/attachment frame members (4) as described

with respect to claims 1 and 6 above. *Supra*, §§ XI(A), (D). (EX1063, col. 2:1-34.)

301. Accordingly, Stopp discloses limitations [9(b)-(c)].

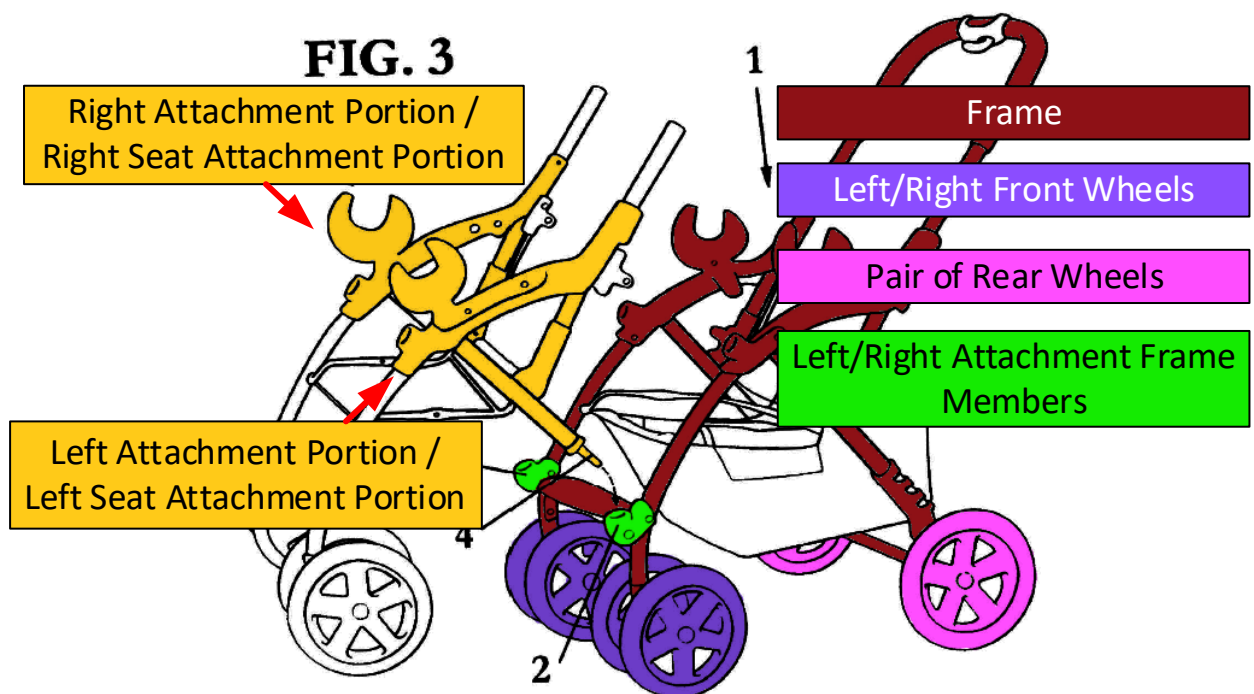


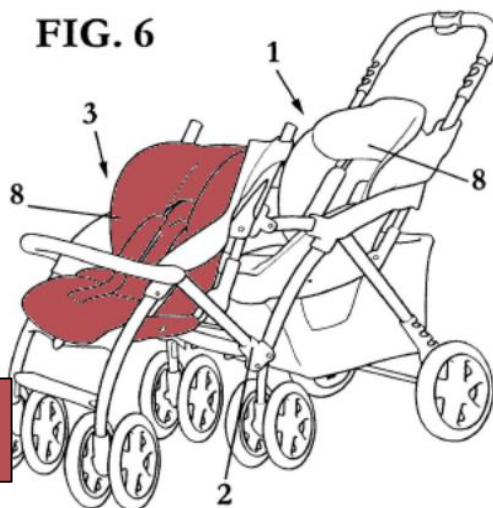
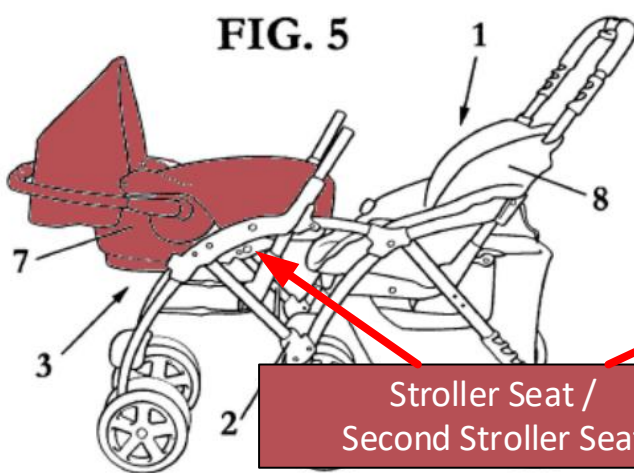
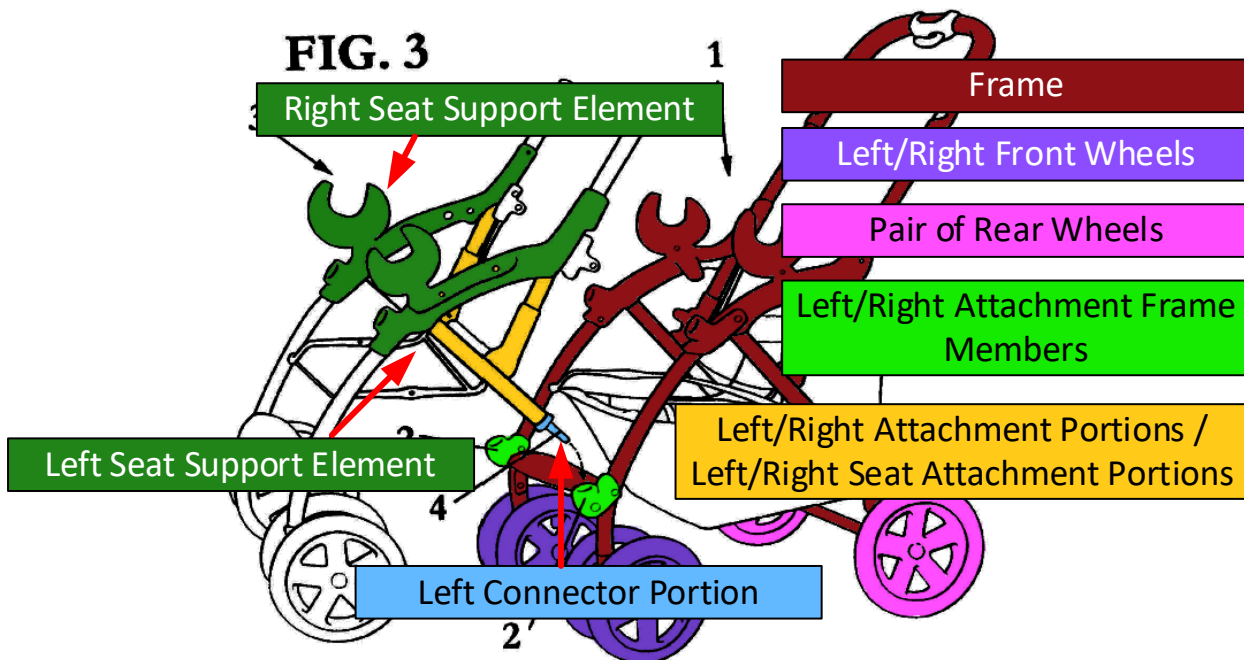
9 (d)	separate left and right seat attachment portions for converting the stroller into a double stroller, the seat attachment comprising:
9 (e)	a connector portion capable of removably connecting to one of the attachment frame members above a respective front wheel of the stroller, and
9 (f)	a seat support element removably connecting a second stroller seat in either a forward or backward position.

302. As discussed with respect to claims 1 and 6, *supra*, §§ XI(A), (D), Stopp includes left and right side seat attachment portions, as shown in FIG. 3. (EX1063, col. 2:1-20, FIG. 3.) These attachment portions convert a single stroller into a double stroller, as shown in Figures 1-6. (*Id.*, FIGS. 1-6.)

303. The connector portions of the respective seat attachment portions are disclosed as being the rods (4) that removably connect to the bushings (2) located above the front wheels, and the seat support elements are disclosed as the “claw” and arm components in the embodiments depicted in Figures 2-3 and 5 (as discussed above, e.g., with respect to claims 1 and 6). (*Id.*, col. 2:1-34.) The seat support elements can support a seat facing forward or backward. (*Id.*)

304. Accordingly, Stopp discloses limitations [9(d)-(f)].





H. Claim 10

10	The stroller of claim 9, wherein the first stroller seat is releasably connected in a backward position.
----	--

305. Stop discloses the first stroller seat (rear seat) is releasably connected

in a backward-facing position. In particular, Stopp discloses that the seat attachment permits a seat to be removably connected in the same or similar manner as the main stroller, including the functionality of the seat support element (EX1063, col. 2:1-34.) The seat attachment includes functionality for supporting a seat in a forward or rear-facing configurations, as shown in Figures 5-6. Since the main stroller also includes the same coupling mechanism for attaching a seat, a POSITA would have understood that a seat oriented in a forward or backward position can also be releasably connected thereto. (*Id.*, FIGS. 5, 6.)

306. Furthermore, as laid out in the discussion of claim 9, *supra* § XI(G), connections for permitting a seat to face both forward and backward were conventional and well-known at the time of invention, and it would have been obvious to POSITA to use such connections to releasably connect a seat to the stroller of Stopp.

307. Accordingly, Stopp discloses, or alternatively renders obvious, the additional limitations of claim 10.

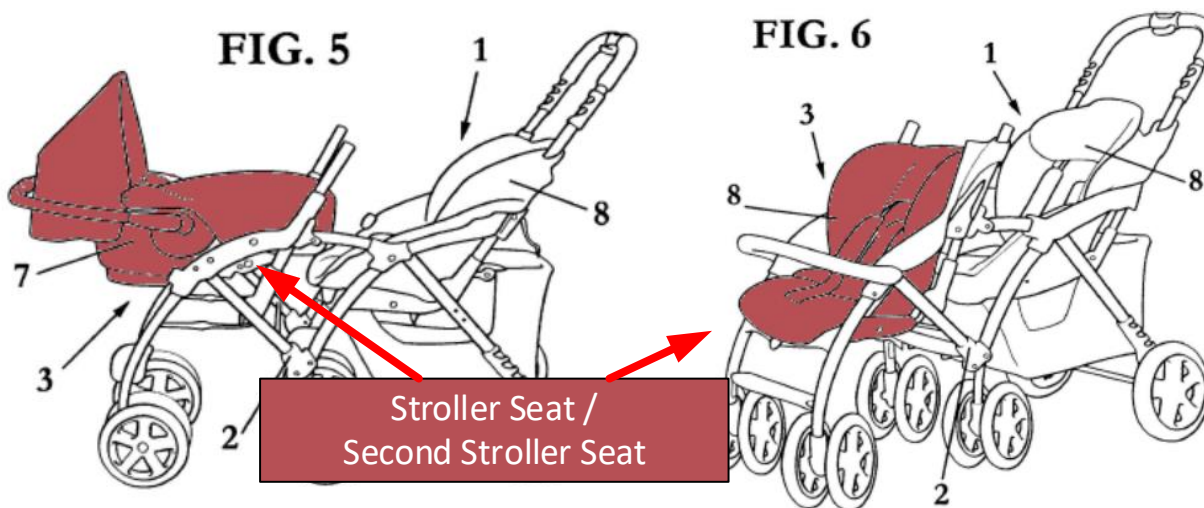
I. Claim 11

11	The stroller of claim 10, wherein the second stroller seat is one of a stroller seat, a car seat, or a bassinet.
----	--

308. As depicted in FIG. 5, Stopp discloses that the second (front) seat can at least be a stroller seat or a bassinet (a carrycot and bassinet are the same), and the

seat (8) of FIG. 6 is depicted as a stroller seat. (EX1063, col. 2:1-34, FIGS. 5, 6.)

309. Accordingly, Stopp discloses the additional limitations of claim 11.



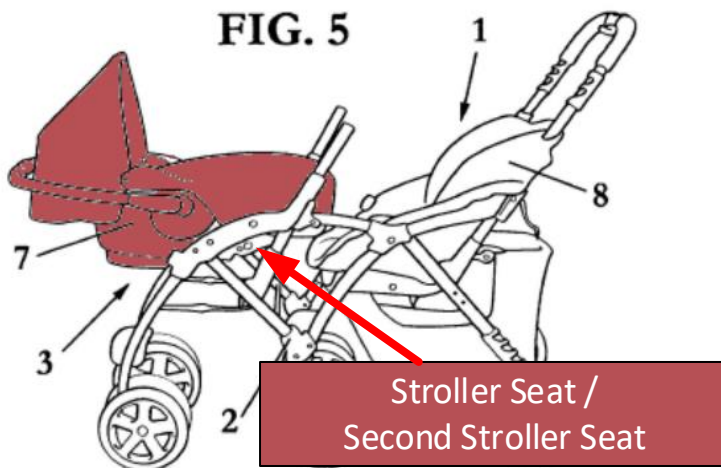
J. Claim 12

12	The stroller of claim 9, wherein the second seat is a bassinet or a car seat.
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310. As shown in FIG. 5, Stopp discloses the second seat being a bassinet.

(*Id.*; col. 2:40-49, FIG. 5.)

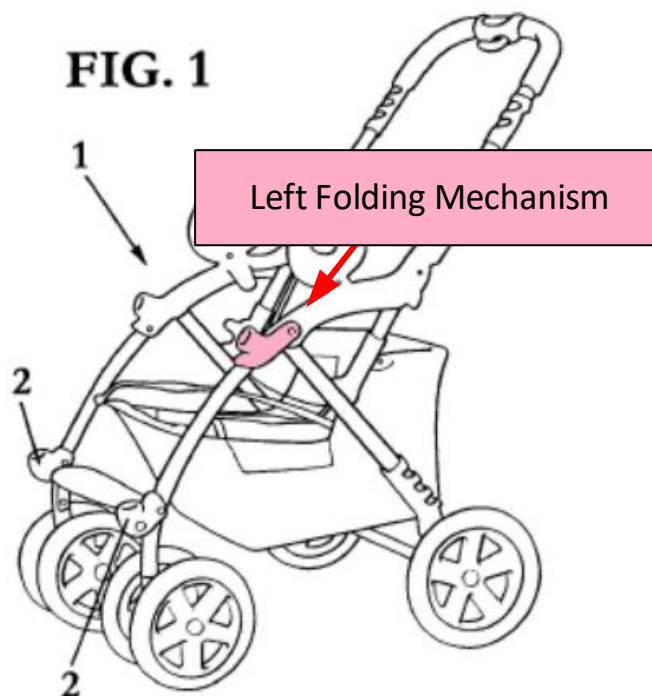
311. Accordingly, Stopp discloses the additional limitations of claim 12.



K. Claim 13

312. Stopp discloses a folding mechanism on each side of the stroller frame, as best seen and labeled in Figure 1. To the extent that Stopp does not expressly disclose two folding mechanisms, Stopp discloses that the underlying stroller is conventional in nature. (EX1063, col. 2:1-20.). At the time, almost all conventional strollers included at least two folding mechanisms – one mechanism on each side – and it was well-known to do so. Thus, at minimum, it would have been obvious to POSITA to incorporate two folding mechanisms into the frame of Stopp to permit the stroller of Stopp to fold because POSITA would have known that folding mechanisms are conventional and well-known devices that permit a stroller to be more easily stowed and transported, which is desirable. POSITA would have reasonably expected success because conventional elements, such as folding mechanisms, are well-known and well-within POSITA's skill to implement.

313. Accordingly, Stopp discloses, or alternatively renders obvious, the additional limitations of claim 13.



L. Claim 14

314. Stopp discloses a releasable connection, including a button or a locking tab, to secure the first stroller seat, as best seen and labeled in Figure 1. To the extent that Stopp does not expressly disclose this limitation, Stopp discloses that the underlying stroller is conventional in nature. (EX1063, col. 2:1-20.). At the time, many conventional strollers included a releasable connection for securing a seat to the stroller, including a button or a locking tab and it was well-known to do so. Thus, at minimum, it would have been obvious to POSITA to use a releasable connection with a button or locking tab to secure the first seat to the stroller frame because such

mechanisms were conventional and well-known in the prior art, and because POSITA would have known that it was desirable to use a releasable locking feature to selectively secure a seat to the stroller and prevent the seat from becoming unintentionally dislodged, which could result in injury to the passenger. POSITA would have reasonably expected success because these elements are conventional and modifying Stopp to use them is well-within POSITA's skill.

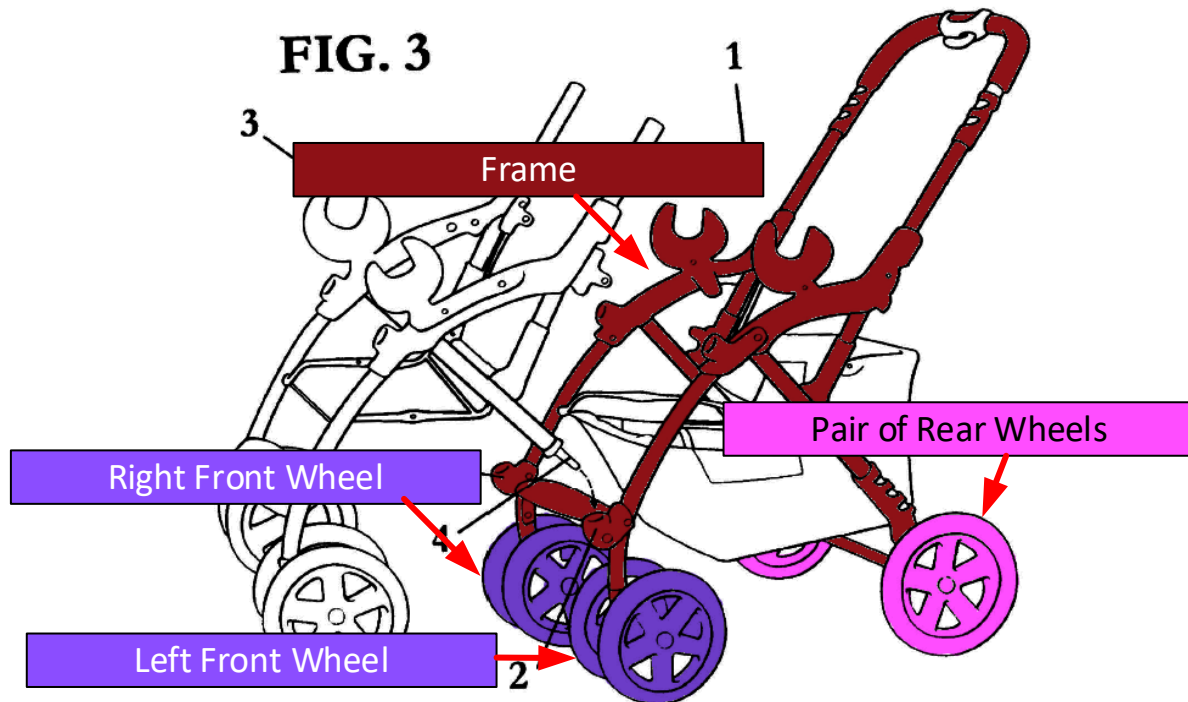
315. Accordingly, Stopp discloses, or alternatively renders obvious, the additional limitations of claim 14.

M. Claim 15

15	The stroller of claim 12 , comprising a pair of back wheels.
----	---

316. Stopp discloses a pair of back wheels as shown in FIGS. 1 and 3.
(EX1063, FIGS. 1, 3.)

317. Accordingly, Stopp discloses the additional limitations of claim 15.



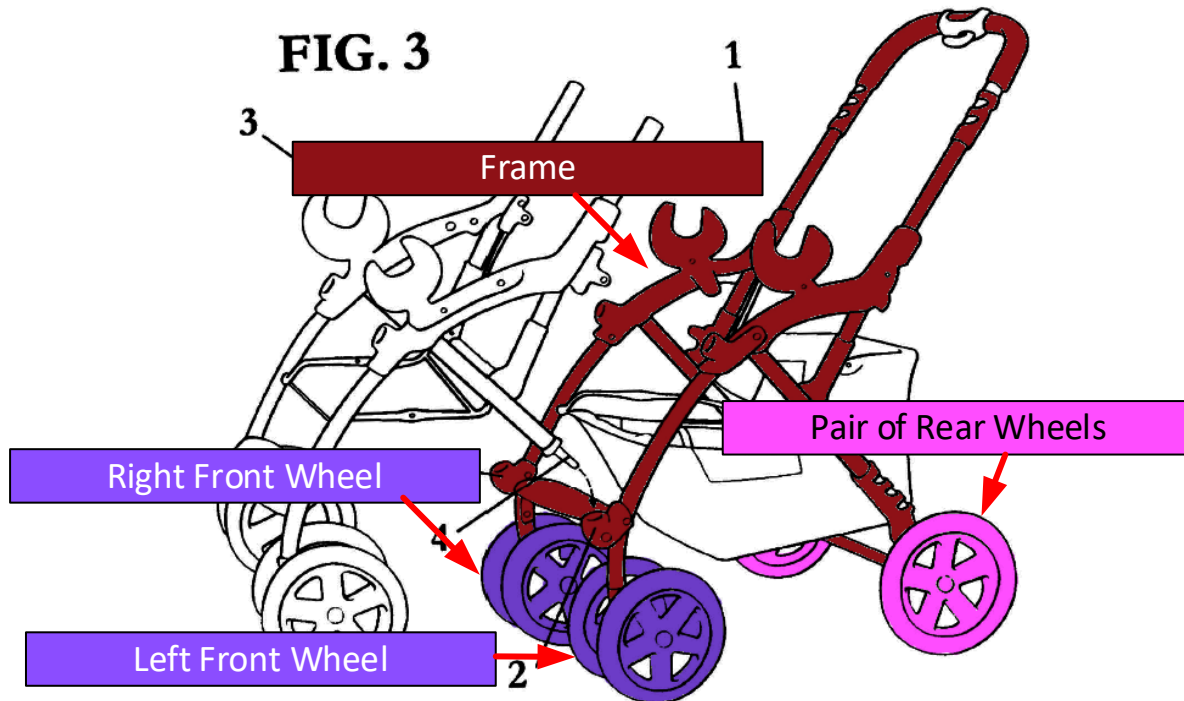
N. Claim 16

16	The stroller of claim 15, wherein the front wheels pivot and the back wheels are fixed.
----	---

318. Stopp discloses a pivoting pair of front wheels on individual axes and a fixed pair of wheels in the back. (EX1063, FIGS. 1, 3.). To the extent that Stopp does not expressly disclose these features, these features would have been obvious to POSITA for at least the reason that the front wheels of Stopp are connected to the frame via a single axis (much like the wheel of the seat attachment in the very front, which is also on a rotating axis). POSITA would have understood that single axes such as these are used for pivoting the wheels, and would have been desirable to easily steer the stroller.

319. Secondly, with respect to the rear wheels, POSITA would have understood that they are connected to the frame by a series of crossbars and vertical rear-wheel frame elements. POSITA would have known that this rectangular configuration would not be capable of pivoting as illustrated, teaching that the rear wheels are fixed. Moreover, as discussed above, Stopp also discloses that the underlying stroller is conventional, and it was well-known at that time to include pivoting front wheels and fixed rear wheels on conventional strollers.

320. Accordingly, Stopp discloses, or alternatively renders obvious, the additional limitations of claim 16.

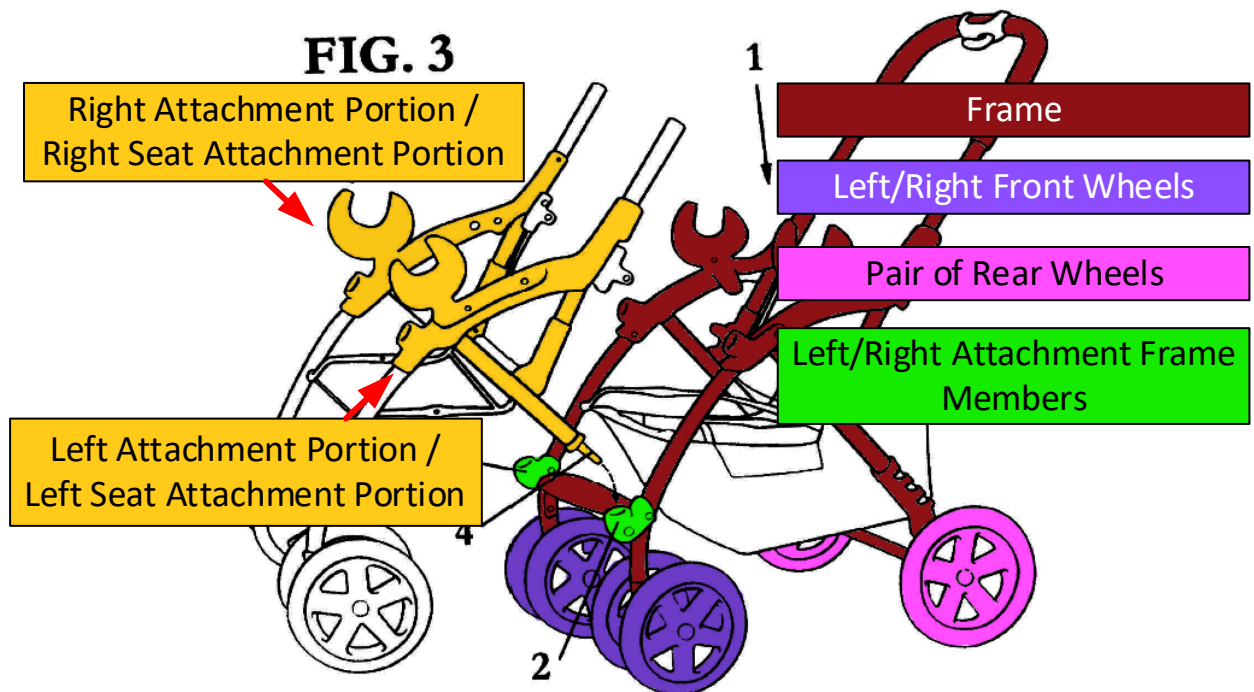


O. Claim 17

17	The stroller of claim 9, wherein one of the two attachment frame members is a right side attachment frame member and the other attachment frame member is a left attachment frame member.
----	---

321. Stopp discloses left and right side attachment frame members. In particular, the bushings (attachment frame members) (2) as shown in FIG. 3 are located on the left and right sides of the stroller. (EX1063, col. 2:1-34, FIG. 3.)

322. Accordingly, Stopp discloses the additional limitations of claim 17.



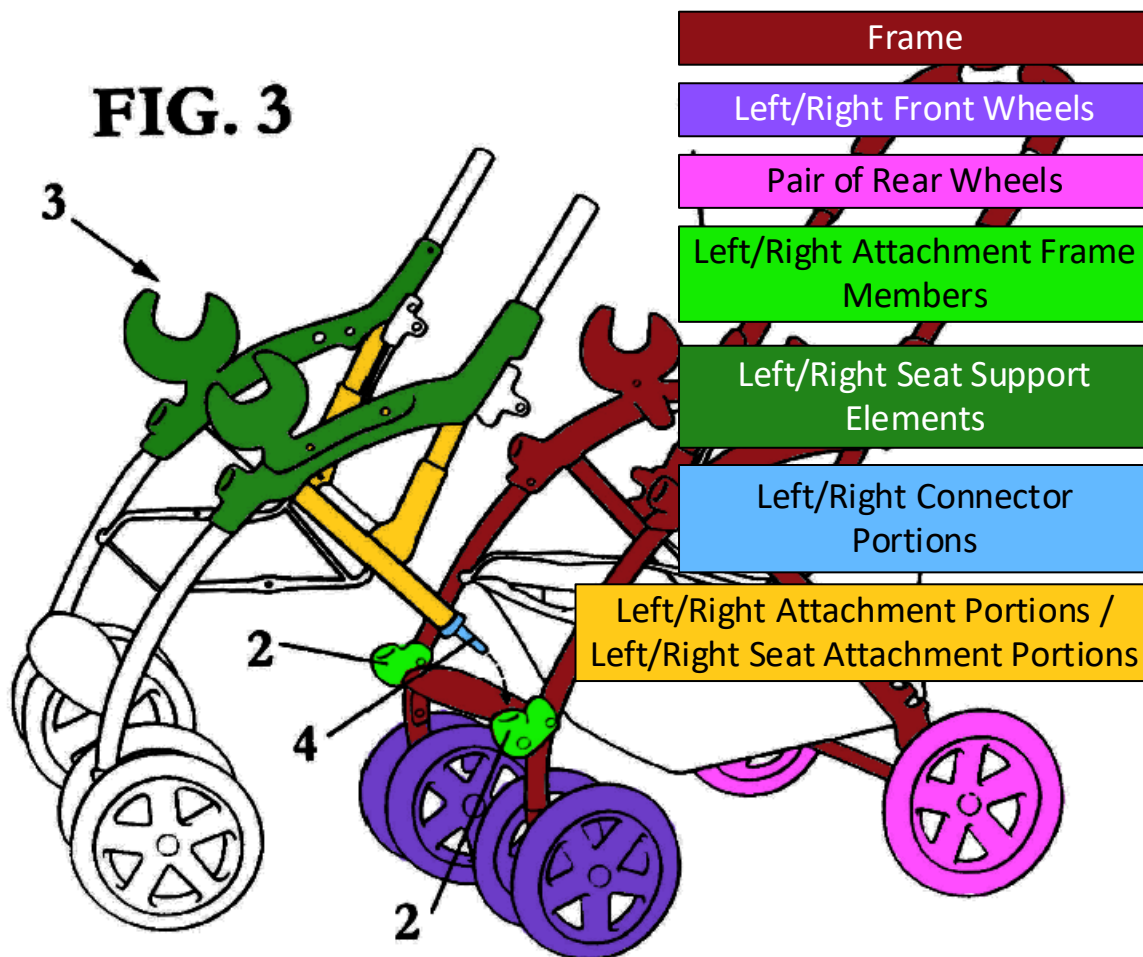
P. Claims 18-23

18	The stroller of claim 9, wherein each of the connector portions has a cylindrical shape.
19	The stroller of claim 18, wherein the attachment frame member has a cylindrical slot.

20	The stroller of claim 19 , wherein the connector portion of the seat attachment portion is inserted in the cylindrical slot.
21	The stroller of claim 9 , wherein the connector portion is tubular construction.
22	The stroller of claim 9 , wherein the connector portion has a circular cross-sectional shape.
23	The stroller of claim 9 , wherein the connector portion has a complementary and cooperating shape that allows the connector portion to be secured to the attachment portion.

323. Stopp discloses all the additional limitations of claims 18-23. For example, Stopp discloses that the connector portions have a cylindrical shape; that the attachment frame member has a cylindrical slot; and that the connector portion is inserted into the cylindrical slot – as labeled below and depicted in Figures 2-3 and 5. (EX1063, col. 2: 1-34, FIG. 3.) Furthermore, Stopp also discloses that the connector portion is tubular, has a circular cross-section, and has a complementary and cooperating shape that allows the connector portion to be secured to the attachment portion, again, as labeled below and depicted in Figures 2-3 and 5. (*Id.*, FIGS. 2, 3, 5.)

324. Accordingly, Stopp discloses the additional limitations of claims 18-23.

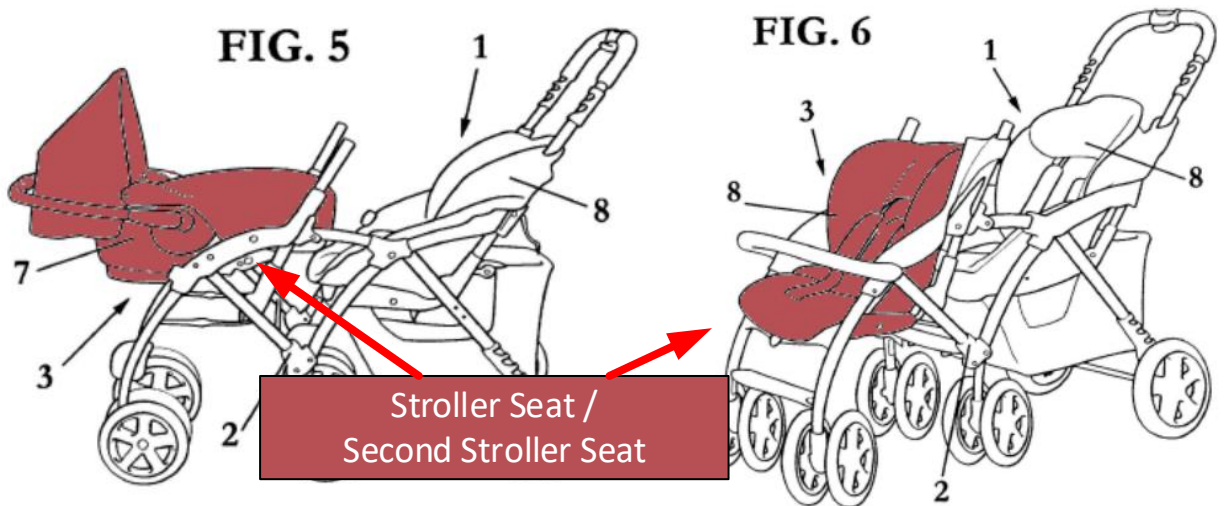


Q. Claim 29

29	The seat attachment for a stroller of claim 24, further comprising a stroller seat connected to the left seat support element and the right seat support element.
----	---

325. Stopp disclose a stroller seat connected between left and right seat support elements as shown in FIG. 6. (EX1063, FIGS. 1-6.)

326. Accordingly, Stopp discloses the additional limitations of claim 29.



R. Claim 30

30	The seat attachment for a stroller of claim 24, wherein both connector portions reversibly connects to the stroller by at least one of buttons, snaps, friction fittings, interference fits, threaded connections, locking tabs, or keyed connections.
----	--

327. Stopp discloses a seat attachment where both connector portions reversibly connect to the stroller with friction fittings and/or interference fits, as depicted in Figures 3-4. (EX1063, FIGS. 3, 4). To the extent that Stopp does not expressly disclose the additional limitations of claim 30, Stopp discloses that the underlying stroller is conventional in nature. (*Id.*, col. 2:1-20.). At the time, many conventional strollers included connections for attaching various components of a stroller together, including with buttons, snaps, friction fittings, interference fits, threaded connections, locking tabs, or keyed connections, and POSITA would have known that buttons, snaps, friction fittings, interference fits, threaded connections, locking tabs, and keyed connections were all conventional and well-known prior to

the filing date of the '869 Patent. Stopp also discloses that both connector portions (rods (4)) may be secured to the stroller using a retaining system, which POSITA would have understood is a friction or interference fit. Accordingly, and to the extent already not disclosed, POSITA would have been motivated to modify Stopp to use any of the aforementioned securing means to prevent the seat attachment from coming loose from the stroller, which would be desirable to prevent injury or maloperation of the stroller of Stopp. POSITA would have reasonably expected success because the modifications to Stopp are conventional, straightforward, and well-within POSITA's skill.

328. Accordingly, Stopp discloses, or alternatively renders obvious, the subject matter of claim 30.

XII. GROUND 4 – STOPP IN VIEW OF CHEN

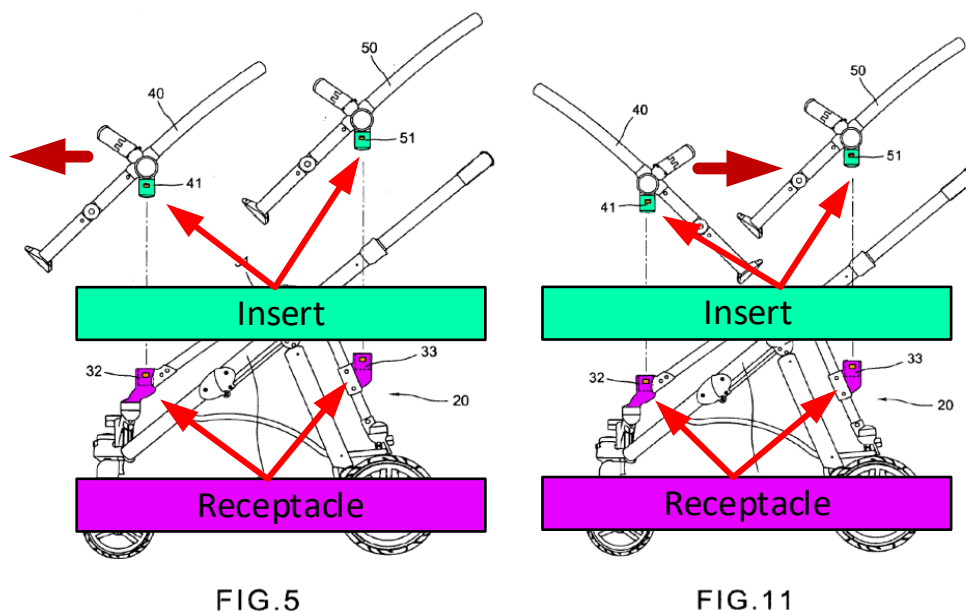
Claims 1-30 were obvious in view of Stopp, as explained with respect to Ground 3 (*Supra*, §§ XI.) However, if the Patent Owner argues that Stopp fails to disclose one or more limitations of claims 1-30, then Stopp and Chen render these claims obvious.

A. Claims 1 & 24

330. As discussed *supra* § XI, Stopp discloses a seat attachment for a stroller comprising separate left and right attachment portions with seat support elements. Chen discloses receptacles (32, 33) for a stroller into which inserts (41, 51) for seats can be removably inserted. (EX1065, ¶¶ 5-8, 24.) The inserts and receptacles permit the seat to face forward or backward. (*Id.*, ¶¶ 5-8, ¶¶ 24, 26, FIGS. 5 & 11.)

331. To the extent that Patent Owner argues that Stopp's seat support elements do not already removably connect a seat in either a forward or backward position, POSITA would have been motivated to modify Stopp's seat support elements to removably connect a seat in either a forward or backward position, as taught by Chen. (EX1065, ¶¶ 5-6, 24.) POSITA would have been motivated to modify Stopp's seat support elements as taught by Chen because POSITA would have known that it is desirable to use removable seats that can face both forward or backward because this makes it convenient to arrange the seats as desired, to adjust the seats to face each other without interference, and to arrange the passengers in different ways. (*Id.*)

332. POSITA would have had a reasonable expectation of success combining Stopp with Chen because both references disclose stroller systems that use conventional design components, and because integrating Chen's components and/or functionality into Stopp would have been straight-forward use of known components and well within POSITA's skills.



333. Stopp in view of Chen discloses or renders obvious the elements of claims 1 and 24 for the same reasons that Stopp disclosed or rendered obvious claim 1 and 24, as discussed *supra* § XI(A).

334. Furthermore, with respect to elements [1b] and [1d] of claim 1 and elements [24b] and [24d] of claim 24, the combination of Stopp and Chen discloses a stroller with left and right seat support elements that are capable of removably connecting a seat facing either forward or backward because the combination of

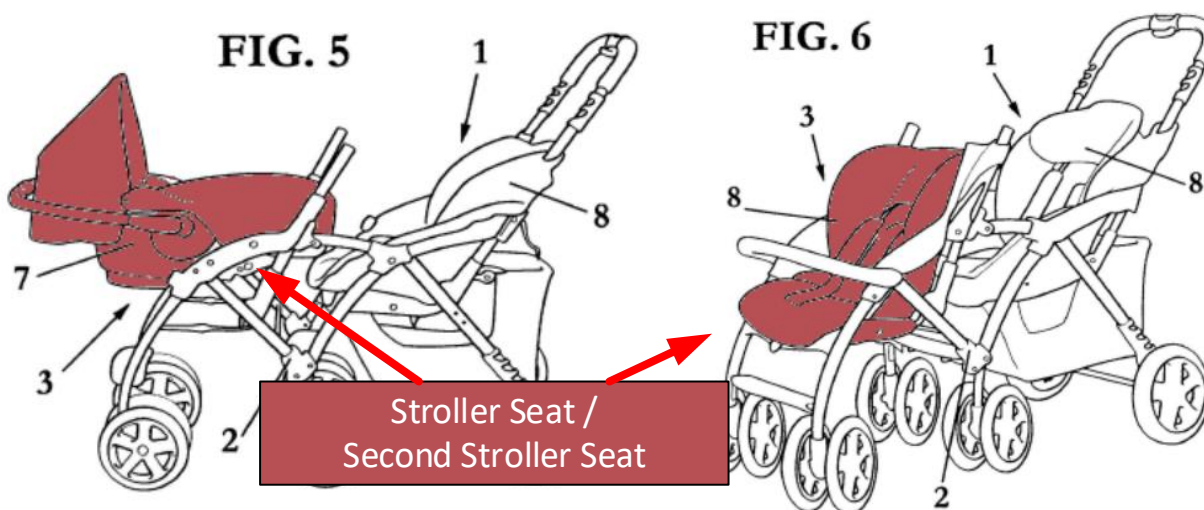
Stopp and Chen incorporates Chen's forward and rear-facing functionality into Stopp. (EX1065, ¶¶ 5-8, 24.)

335. Accordingly, POSITA would have understood that Stopp in view of Chen discloses the subject matter of claim 1.

B. Claims 2 & 25

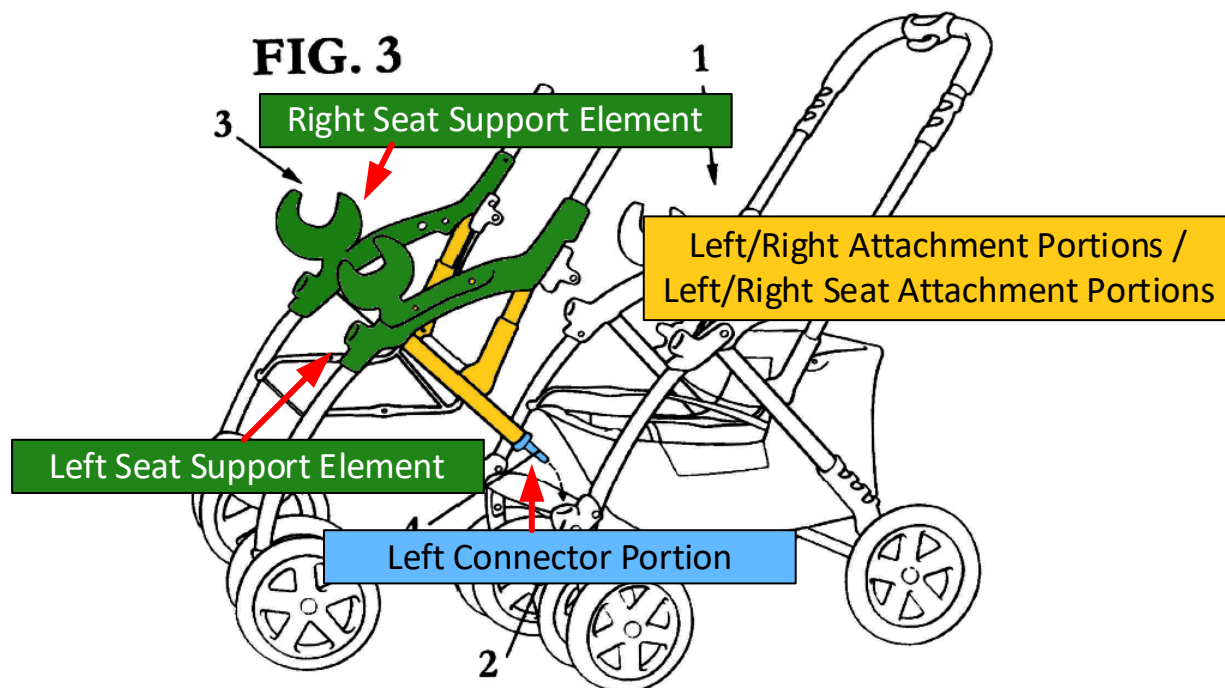
336. Stopp in view of Chen discloses or renders obvious the elements of claims 2 and 25 for the same reasons that Stopp disclosed or rendered obvious claims 2 and 25, as discussed *supra* § XI(B).

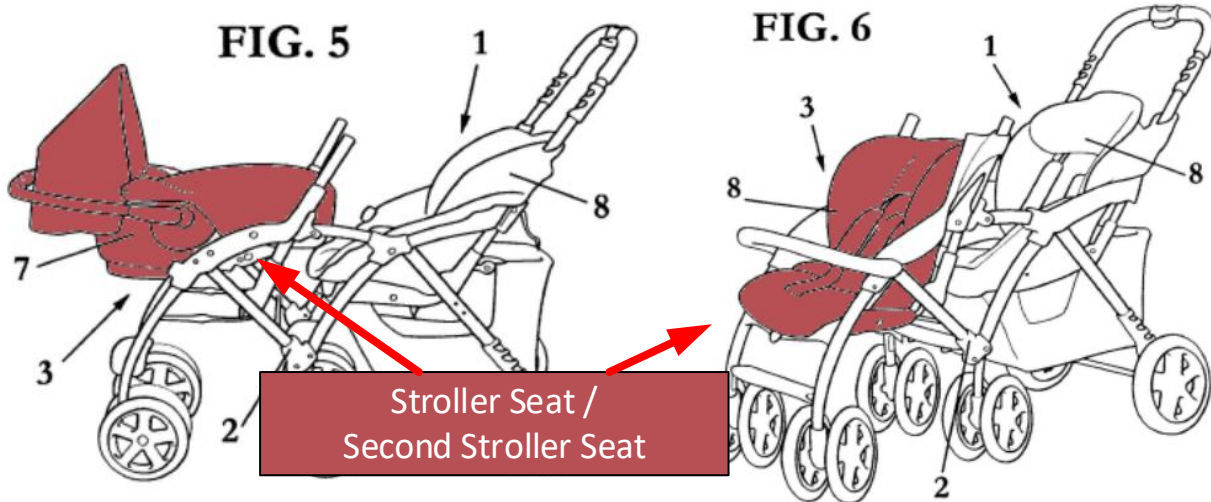
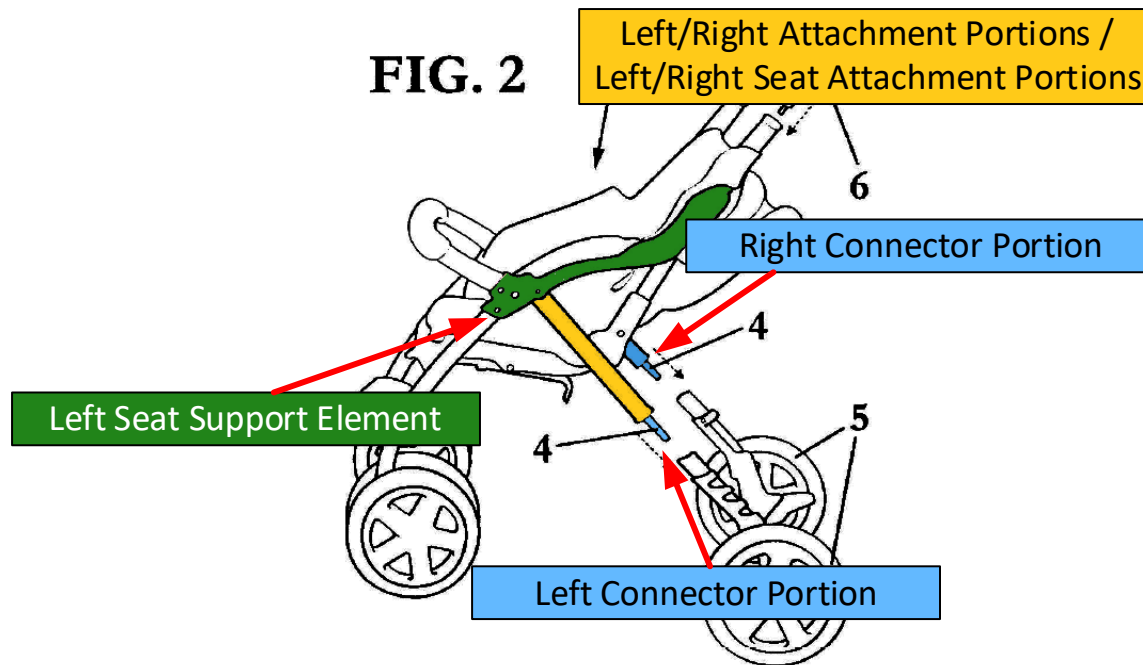
337. To the extent Patent Owner argues that Stopp alone does not disclose the elements of claims 2 and 25, Chen also discloses that the seats are stroller seats. (EX1065, ¶¶ 5-8, 24-28.) It would have been obvious to POSITA to use stroller seats in a stroller since stroller seats permit an infant to be carried by the stroller and are a standard feature of prior art strollers. (*Id.*)



C. Claims 3-5 & 26-28

338. Stopp in view of Chen discloses or renders obvious the elements of claims 3-5 and 26-28 for the same reasons that Stopp disclosed or rendered obvious claims 3-5 and 26-28, as discussed *supra* § XI(C).





D. Claim 9

339. As discussed *supra* § XI(G), Stopp discloses a stroller and a seat attachment for a stroller comprising separate left and right attachment portions with seat support elements. Chen discloses receptacles (32, 33) for a stroller into which

inserts (41, 51) for seats can be removably inserted. (EX1065, ¶¶ 5-8, 24.) The inserts and receptacles permit the seat to face forward or backward. (*Id.*, ¶¶ 5-8 24, FIGS. 5 & 11.)

340. To the extent that Patent Owner argues that Stopp's seat support elements do not already removably connect a seat in either a forward or backward position, POSITA would have been motivated to modify Stopp's seat support elements to removably connect a seat in either a forward or backward position, as taught by Chen. (*Id.*, ¶¶ 5-8, 24.) POSITA would have been motivated to modify Stopp's seat support elements as taught by Chen because POSITA would have known that it is desirable to use removable seats that can face both forward or backward because this makes it convenient to arrange the seats as desired, to adjust the seats to face each other without interference, and to arrange the passengers in different ways. (*Id.*, ¶¶ 5-6.)

341. POSITA would have had a reasonable expectation of success combining Stopp with Chen because both references disclose stroller systems that use conventional design components, and because integrating Chen's components and/or functionality into Stopp would have been straight-forward use of known components and well within POSITA's skills.

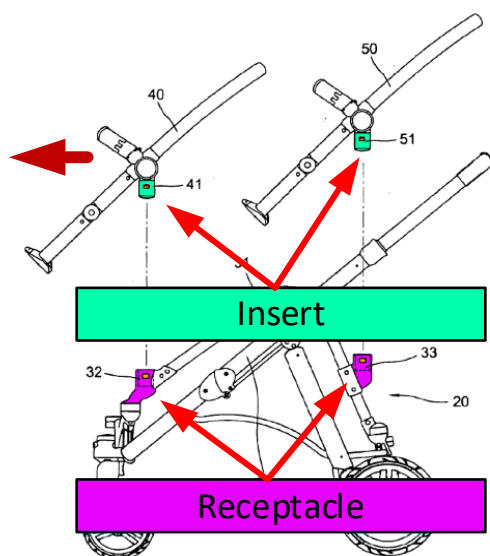


FIG. 5

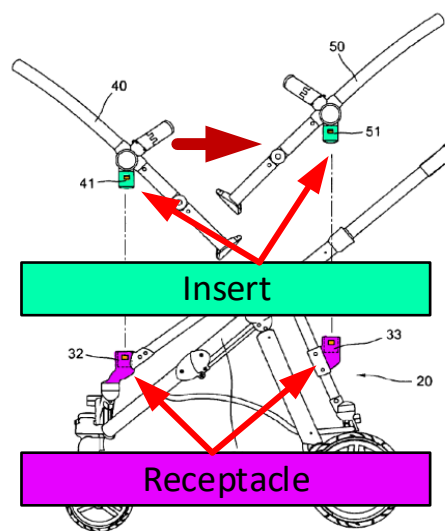


FIG. 11

342. Stopp in view of Chen discloses or renders obvious the elements of claim 9 for the same reasons that Stopp disclosed or rendered obvious claim 9, as discussed *supra* § XI(G).

343. Furthermore, with respect to element [9f] of claim 9, the combination of Stopp and Chen discloses a stroller with left and right seat support elements that are capable of removably connecting a seat facing either forward or backward because the combination of Stopp and Chen incorporates Chen's forward and rear-facing functionality into Stopp. (EX1065, ¶¶ 5-8, 24.)

344. Accordingly, it would have been obvious to POSITA that Stopp in view of Chen discloses the subject matter of claim 9.

E. Claim 10

345. Stopp in view of Chen discloses or renders obvious the elements of

claim 10 for the same reasons that Stopp disclosed or rendered obvious claim 10, as discussed *supra* § XI(H).)

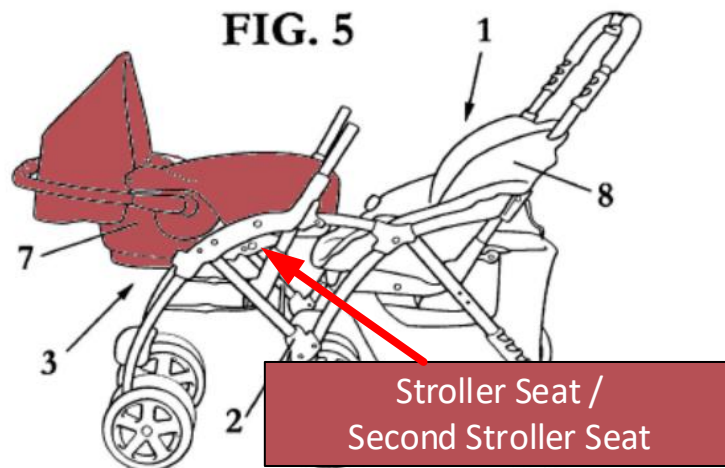
346. Furthermore, Chen also discloses the first stroller seat releasably connected in the backwards position at least because the system is capable of receiving a rear-facing seat and Chen recommends that it is desirable. (EX1065, ¶¶ 5-8.) It would therefore would have been obvious to POSITA to face a seat pointing backwards.

347. Accordingly, it would have been obvious to POSITA that Stopp in view of Chen discloses the subject matter of claim 10.

F. Claim 11

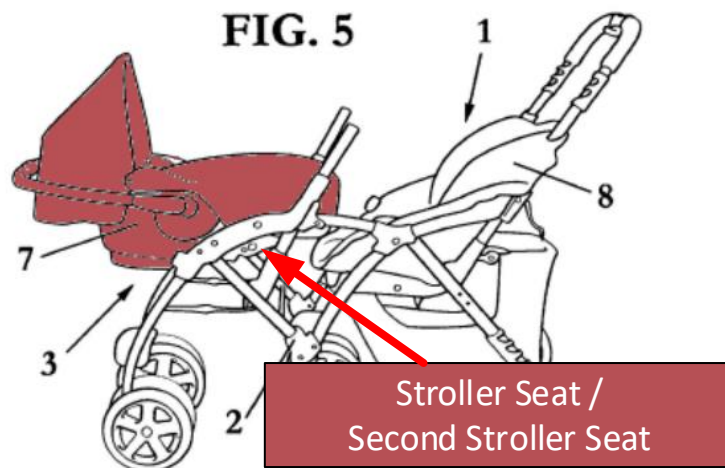
348. Stopp in view of Chen discloses or renders obvious the elements of claim 11 for the same reasons that Stopp disclosed or rendered obvious claim 11, as discussed *supra* § XI(I)

349. Chen also discloses the second seat is a stroller seat. (EX1065, ¶¶ 2-9, 21-26.) It would have been obvious to POSITA to use a stroller seat with a stroller. Accordingly, it would have been obvious to a POSITA that Stopp in view of Chen discloses the subject matter of claim 11.



G. Claim 12

350. Stopp in view of Chen discloses or renders obvious the elements of claim 12 for the same reasons that Stopp disclosed or rendered obvious claim 12, as discussed *supra* § XI(J).



H. Claim 13

351. Stopp in view of Chen discloses or renders obvious the elements of claim 13 for the same reasons that Stopp disclosed or rendered obvious claim 13, as

discussed *supra* § XI(K).

I. Claim 14

352. Stopp in view of Chen discloses or renders obvious the elements of claim 14 for the same reasons that Stopp disclosed or rendered obvious claim 14, as discussed *supra* § XI(L).

353. Chen also discloses this element at least because it would have been obvious to POSITA that, in FIG. 5 of Chen, the tabs (in the inserts 41, 51) and holes (in the receptacle cups 32, 33) are for securing the seats into place so that the seats do not come free. (EX1063, FIG. 5.) Such structures are well-known to POSITA and would have been obvious to POSITA from the figures. POSITA would have reasonable expected success integrating the securing means of Chen into Stopp because such means were conventional and were simple to implement, and integrating such means into Stopp is well-within the skill of POSITA.

354. Accordingly, it would have been obvious to POSITA that Stopp in view of Chen discloses the subject matter of claim 14.

J. Claim 15

355. Stopp in view of Chen discloses or renders obvious the elements of claim 15 for the same reasons that Stopp disclosed or rendered obvious claim 15, as discussed *supra* § XI(M).

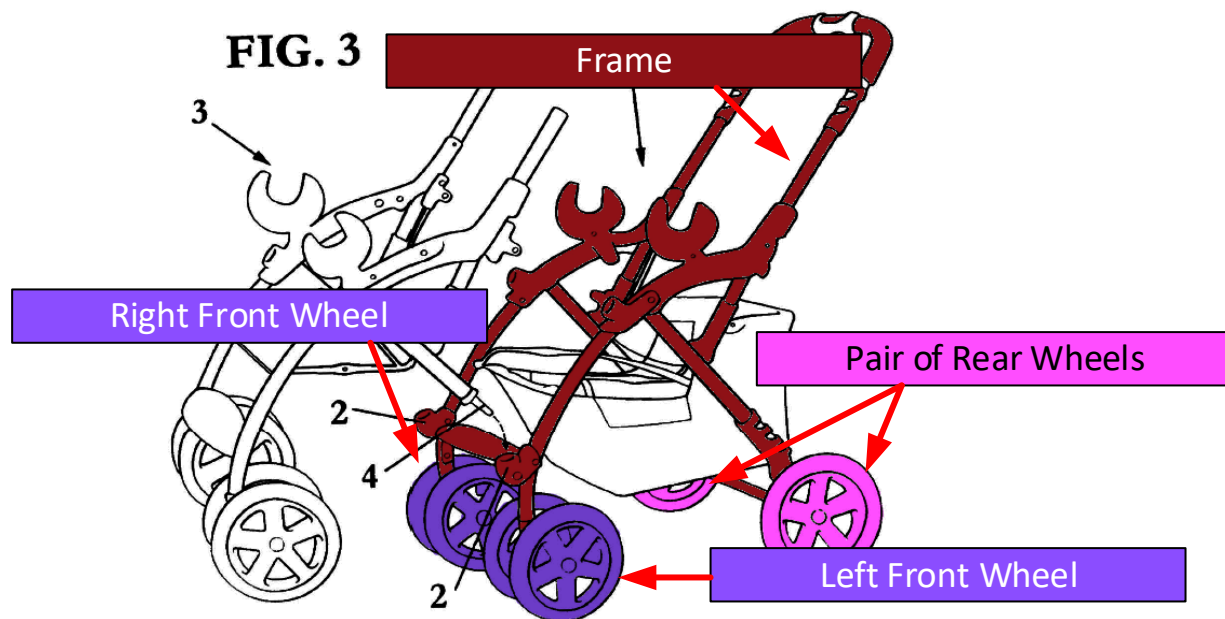


K. Claim 16

356. Stopp in view of Chen discloses or renders obvious the elements of claim 16 for the same reasons that Stopp disclosed or rendered obvious claim 16, as discussed *supra* § XI(N).

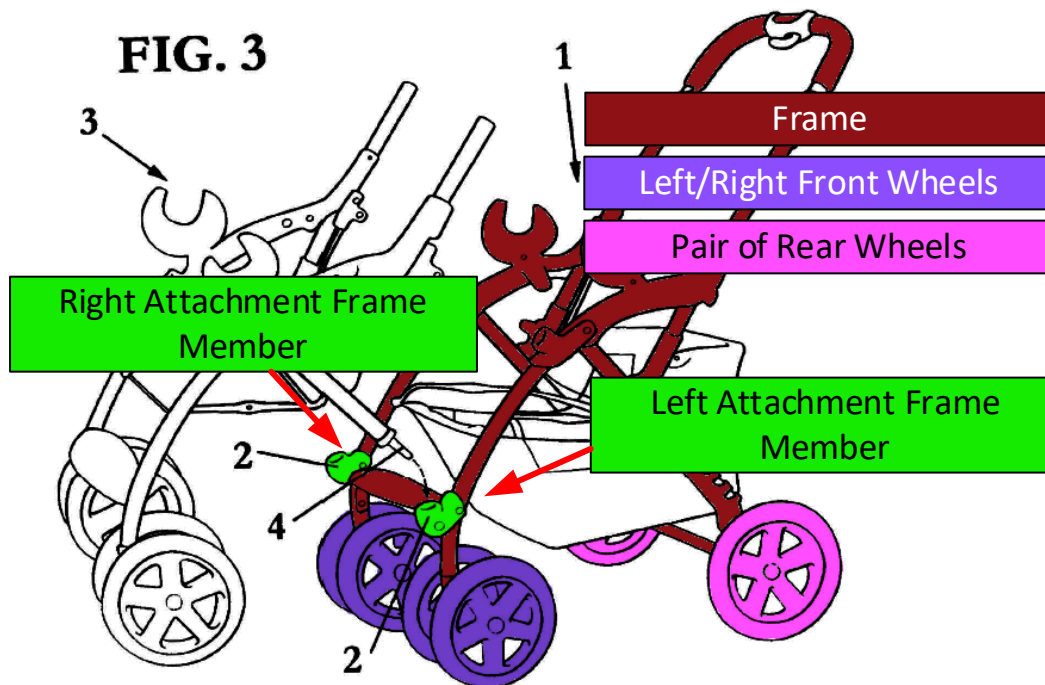
357. Chen also discloses claim 16, as shown in FIG. 3, where the front wheels are on individual pivoting axes (unlabeled) and the rear wheels are on a rigid, rectangular frame. (EX1065, FIG. 3.) This would have been evident to POSITA upon visual inspection of the figures of Chen.

358. Accordingly, it would have been obvious to POSITA that Stopp in view of Chen discloses the subject matter of claim 16.



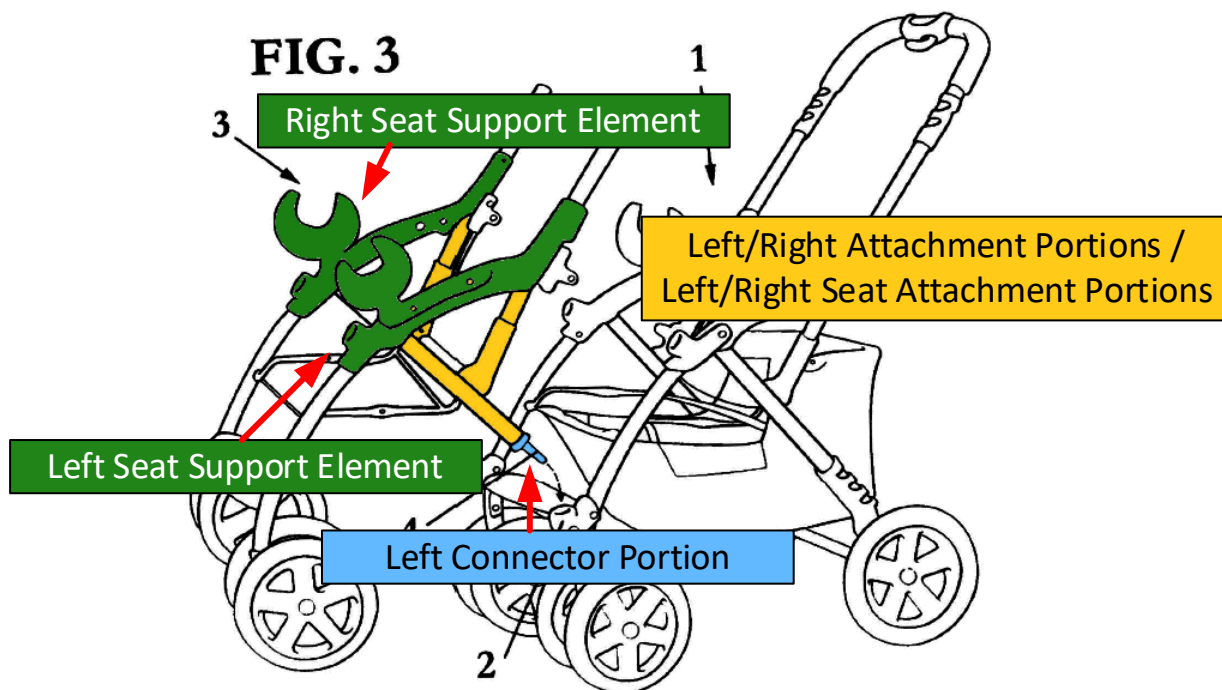
L. Claim 17

359. Stopp in view of Chen discloses or renders obvious the elements of claim 17 for the same reasons that Stopp disclosed or rendered obvious claim 17, as discussed *supra* § XI(O).



M. Claims 18-23

360. Stopp in view of Chen discloses or renders obvious the elements of claim 18-23 for the same reasons that Stopp disclosed or rendered obvious claim 18-23, as discussed *supra* § XI(P)



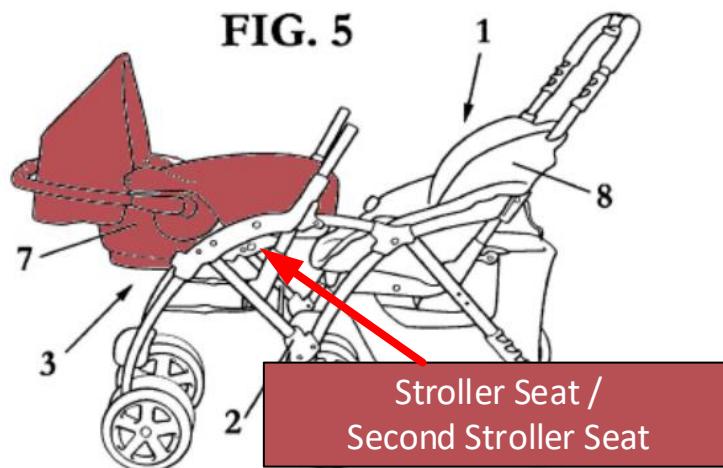
N. Claim 29

361. Stopp in view of Chen discloses or renders obvious the elements of claim 29 for the same reasons that Stopp disclosed or rendered obvious claim 29, as discussed *supra* § XI(Q).

362. Chen also discloses this because it would have been obvious to connect a seat between the receptacle cups, e.g., as shown in FIGS. 5 and 11 of Chen. (EX1065, FIGS. 5, 11.)

363. More generally, the claimed elements would be obvious to a POSITA because virtually all strollers that have two seat supports situated on left and right sides of the stroller will require that the seat be at least partially between the supports.

364. Accordingly, it would have been obvious to POSITA that Stopp in view of Chen discloses or renders obvious the subject matter of claim 29.



O. Claim 30

365. Stopp in view of Chen discloses or renders obvious the elements of claim 30 for the same reasons that Stopp disclosed or rendered obvious claim 30, as discussed *supra* § XI(R).

XIII. GROUND 5 – STOPP IN VIEW OF CHEN IN FURTHER VIEW OF WUN AND LAKE

A. Claim 13

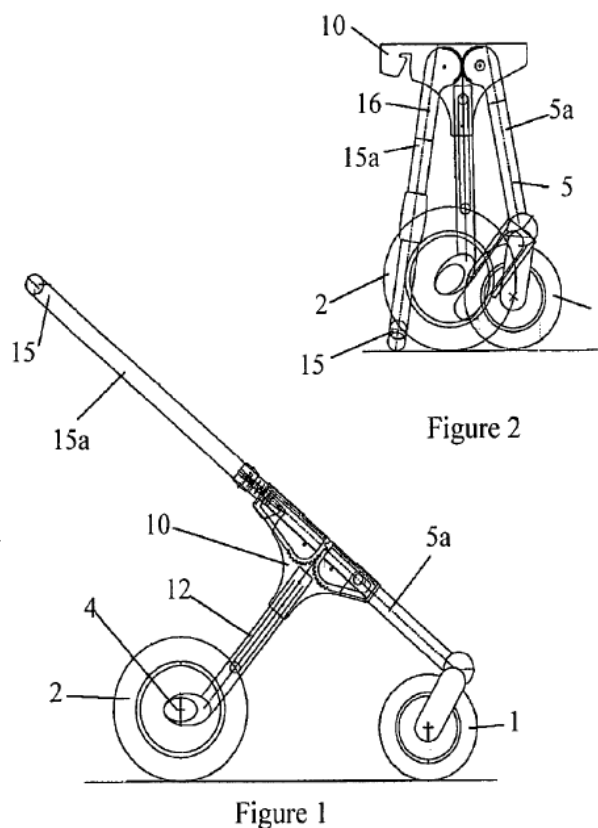
366. Stopp in view of Chen, Wun, and Lake discloses or renders obvious claim 13 for the same reasons that Stopp in view of Chen discloses or renders obvious the subject matter of claim 13, as discussed *supra* § XII(H).

367. To the extent that Patent Owner argues Stopp in view of Chen does not disclose a folding mechanism, Wun discloses a folding mechanism. (EX1060, ¶¶ 3,

35-39, FIG. 1, 2.) It would have been obvious to POSITA to combine the teachings of Wun with Stopp in view of Chen to incorporate a folding device into the frame of Stopp because Wun teaches that it is well-known to make pushchairs, wheel chairs, and the like foldable both for compact storage as well as to easily enable them to be stowed when being transported. (*Id.*) It would have been obvious to POSITA to use a folding mechanism to make the stroller of Stopp easier to store and stow when transporting it. (*Id.*)

368. POSITA would have had a reasonable expectation of success combining Stopp in view of Chen with Wun and/or Lake because each reference discloses stroller systems that use conventional design components, and because integrating Wun and/or Lake's components and/or functionality into Stopp in view of Chen would have been straight-forward use of known components and well within POSITA's skills.

369. Accordingly, it would have been obvious to POSITA that Stopp in view of Chen in further view of Wun and Lake discloses the elements of claim 13.



B. Claim 14

370. Stopp in view of Chen, Wun, and Lake discloses or renders obvious claim 14 for the same reasons that Stopp in view of Chen discloses or renders obvious the subject matter of claim 14, as discussed *supra* § XII(I).

371. However, to the extent that the Patent Owner argues that Stopp in view of Chen does not disclose a releasable connection for the first seat including a button or a locking tab, Lake discloses a releasable connection including a button or a locking tab. (EX1061, ¶¶ 44, 46-51, FIG. 4(a)-(c).)

372. It would have been obvious to POSITA to combine the teachings of Lake with Stopp in view of Chen to incorporate a releasable connection with a button

or locking tab into the frame of Stopp because Lake teaches that a locking mechanism using a push-button control may be used to prevent the child carrying unit (seat) from inadvertently becoming detached from the frame. (*Id.*) POSITA would have known that the seat becoming inadvertently detached could result in injury to the passenger or damage to the child carrying unit or stroller frame. (*Id.*) It would therefore have been obvious to POSITA to incorporate the releasable connection having a button or tab taught by Lake into the frame and seat of Stopp to prevent inadvertent injury to the passenger in the seat or damage to the frame or seat.

373. POSITA would have had a reasonable expectation of success combining Stopp in view of Chen with Wun and/or Lake because each reference discloses stroller systems that use conventional design components, and because integrating Wun and/or Lake's components and/or functionality into Stopp in view of Chen would have been straight-forward use of known components and well within POSITA's skills.

374. Accordingly, it would have been obvious to POSITA that Stopp in view of Chen in further view of Wun and Lake discloses the elements of claim 14.

Fig. 4a

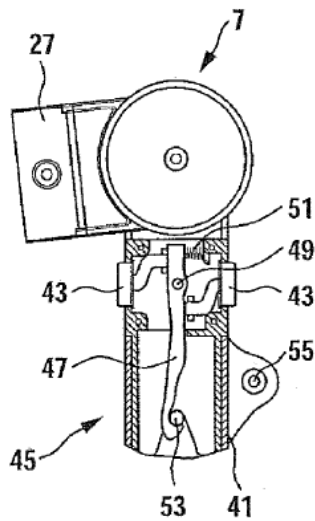


Fig. 4b

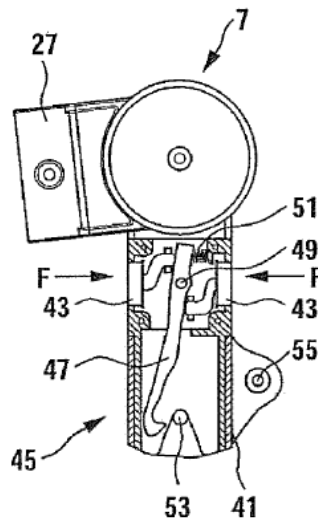
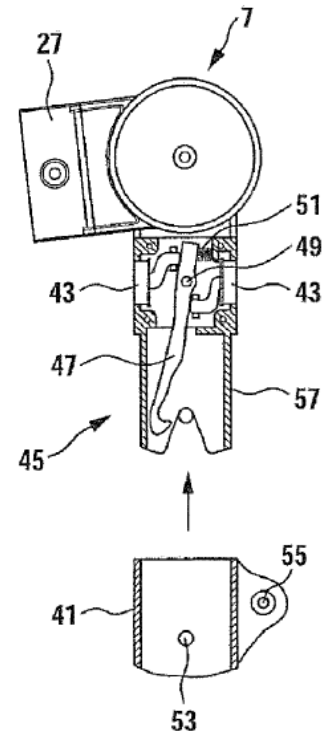


Fig. 4c



XIV. Conclusion

375. In my opinion, all the elements of the challenged claim limitations are disclosed by the references discussed above and that the claims are unpatentable in view of these prior art references.

376. I reserve the right to supplement my opinions to address any information obtained, or positions taken, based on any new information that comes to light throughout this proceeding.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my ability.

Executed on: 6-20-25

Douglas S. Prairie
Douglas S. Prairie