

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

MONAHAN PRODUCTS, LLC
d/b/a UPPABABY; and

BABY GENERATION, INC
d/b/a MOCKINGBIRD;

Petitioner

v.

BABY JOGGER

Patent Owner

Case IPR2025-01105

Patent 8,955,869

PETITION FOR *INTER PARTES* REVIEW

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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	
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1022	Non-certified File History of U.S. Patent No. 11,505,231	
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Exhibit No.	Description	Identifier
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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
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

Exhibit No.	Description	Identifier
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
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CLAIM LISTING¹

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;

¹ This claim listing presents the claims and their constituent limitations as referred to in this Petition. Bolded words indicate the language that varies across claims when they are addressed together below.

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.

MANDATORY NOTICES

A. Real Party-in-Interest (37 C.F.R. § 42.8(b)(1))

Monahan Products, LLC d/b/a/ UPPAbaby (“UPPAbaby”), and Baby Generation, Inc. d/b/a Mockingbird (“Mockingbird”) (collectively, “Petitioner”) are the real-parties-in-interest.

B. Related Matters (37 C.F.R. 42.8(b)(2))

The following matters may affect, or be affected by, a decision in this proceeding:

District Court Litigations

- Baby Jogger, LLC v. Baby Generation, Inc., d/b/a Mockingbird, No. 1:24-cv-00725-GBW (D. Del.);
- Baby Jogger, LLC v. Evenflo Company, Inc., No. 1-24-cv-00723-GBW (D. Del.); and
- Baby Jogger v. Monahan Products, LLC, d/b/a UPPAbaby, No. 1:24-cv-11582-ADB (D. Mass.) (“the litigation”).

PTAB Proceedings

- *Baby Generation, Inc. d/b/a Mockingbird et al. v. Baby Jogger, LLC*, IPR2025-01095;
- *Baby Generation, Inc. d/b/a Mockingbird et al. v. Baby Jogger, LLC*, IPR2025-01100; and

- *Baby Generation, Inc. d/b/a Mockingbird et al. v. Baby Jogger, LLC*, IPR2025-01120.
- *Monohan Products, LLC, d/b/a UPPAbaby et al. v. Baby Jogger, LLC*, IPR2025-01106.

Additional petitions for review of patents related to the '869 Patent are forthcoming. Petitioner will supplement its mandatory notices pursuant to 37 § 42.8(a)(3).

C. Lead and Back-up Counsel (37 C.F.R. § 42.8(b)(3))

Petitioner identifies the following lead and back-up counsel:

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--	--

D. Service Information (37 C.F.R. § 42.8(b)(4))

Petitioner consents to, and request, electronic service via the email, if served via the email addresses for counsel identified above, and identify the following additional information for service email addresses:

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E. Word Count Certification

Petitioner certifies that this Petition complies with the limitations set forth in 37 C.F.R. § 42.24(a)(1)(i). This Petition contains 13980 words, according to the word count function of Microsoft Word.

F. Fees

The fees set forth in 37 C.F.R. § 42.15(a) have been submitted with this Petition. Any additional fees are authorized to be charged to Deposit Account No. 50/2762.

I. INTRODUCTION

Petitioner respectfully petitions for *inter partes* review (“IPR”) of claims 1-30 (“Challenged Claims”) of U.S. Patent No. 8,955,869 (“’869 patent”) (EX 1004) purportedly owned by Baby Jogger, LLC (“PO”).

II. U.S. PATENT NO. 8,955,869 PATENT AND PROSECUTION HISTORY

A. Description of the ‘869 Patent

The ‘869 Patent was filed on April 24, 2014, claiming priority back to December 4, 2008. The ‘869 Patent issued on February 17, 2015. As a result, the earliest possible priority date is December 4, 2008.

The alleged invention of the ‘869 Patent is a seat attachment for a stroller that permits conversion of a single-seat stroller into a double-seat stroller. (EX1004, ‘869 Patent (Background) (“this invention relates to an accessory, attachment, or conversion kit for a stroller.”) (cleaned up).) This type of stroller attachment is well known in the prior art. For example, prior art patents and publications, including Liao, and Stopp, all disclose apparatuses for converting single strollers into double strollers. (EX1001, Declaration, ¶¶ 110-118.)

The ‘869 Patent discloses a stroller. (EX1004, ‘869 Patent, FIG. 1). 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. (*Id.*, 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. (EX1001, Declaration, ¶¶ 110-118.)

The stroller also includes two attachment frame members (17) (called attachment portions in the specification) on either side. (EX. 1005, col. 5:11-29.) The attachment frame members (17, blue) contains slots (18) for receiving connector portions of a seat attachment. (*Id.*; EX1001, Declaration, ¶¶ 110-118.)

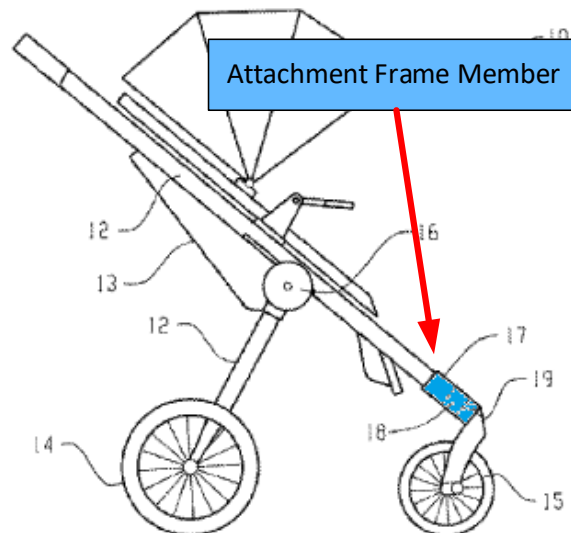


Fig. 1

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

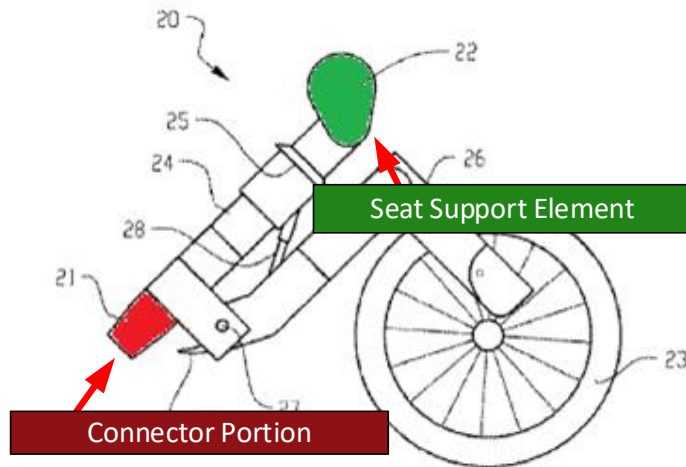


Fig. 2

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

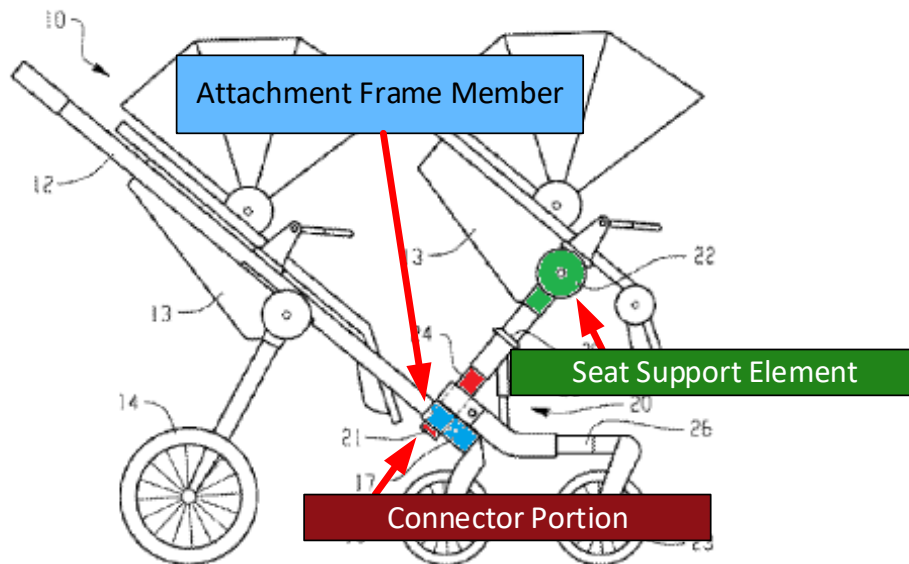


Fig. 3

The seat attachment (20) includes connector portions (21, red) 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, green) (sometimes called seat attachment elements in the Specification) to which a seat can removably attach in a front- or backwards-facing position. (EX. 1005, 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.*; EX1001, Declaration, ¶¶ 110-118.)

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, blue) 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”); EX1001, Declaration, ¶¶ 110-118.)

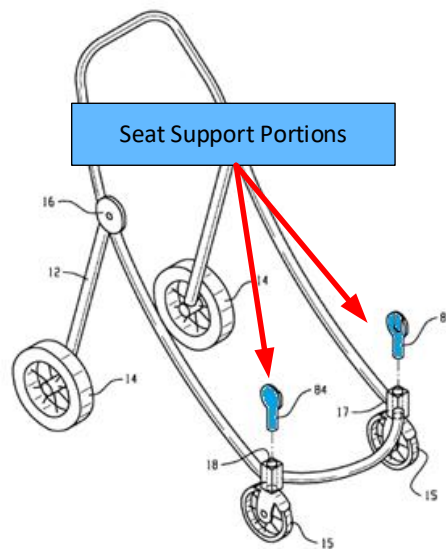


Fig. 10

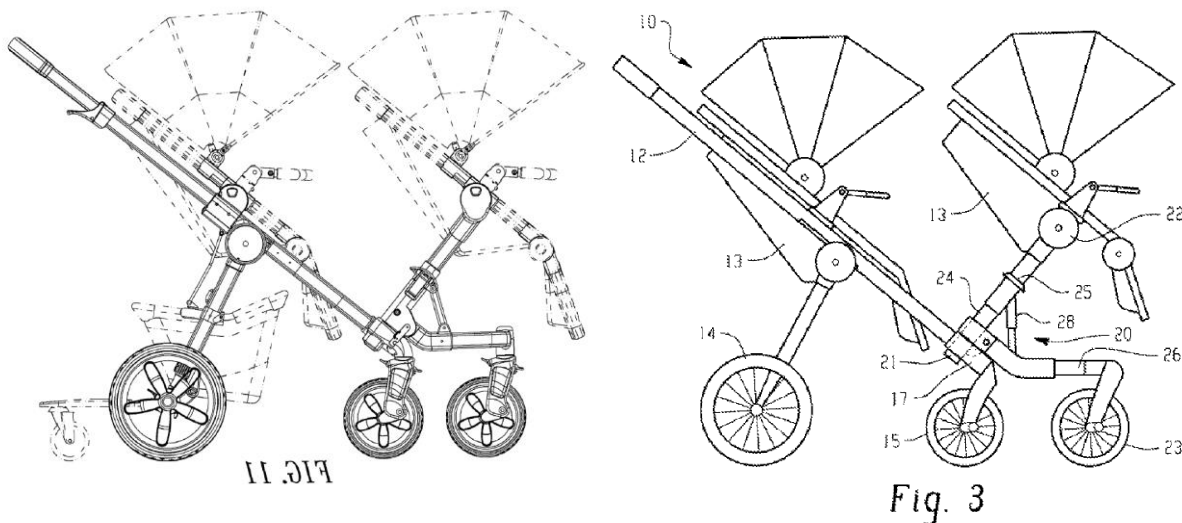
In short, the '869 Patent discloses a seat attachment (20) that plugs into the frame of a stroller (10) to permit an additional seat to be added to the stroller, the additional seat being able to face either forward or backward. (EX1001, Declaration, ¶¶ 110-118.)

III. SUMMARY OF THE PRIOR ART TO THE '869 PATENT

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

Liao was filed on September 5, 2008, and issued on June 2, 2009. (EX1048.) Accordingly, Liao constitutes prior art under at least (pre-AIA) § 102(e). Liao was not considered during prosecution of the '869 Patent.

As demonstrated below in Ground 1, Liao renders obvious all claims of the '869 Patent. In fact, a comparison of FIG. 11 of Liao and FIG. 3 of the '869 Patent, shown below, is striking. (EX1001, Declaration, ¶¶ 120-122.)



(EX1048, FIG. 11 (mirrored); EX1004, FIG. 3.)

Although Liao was not considered by the Examiner during prosecution of the '869 Patent, the Patent Office has repeatedly relied on Liao to reject claims in related applications claiming priority to the '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. (EX1019, 563-64; EX1001, ¶¶ 120-122.)

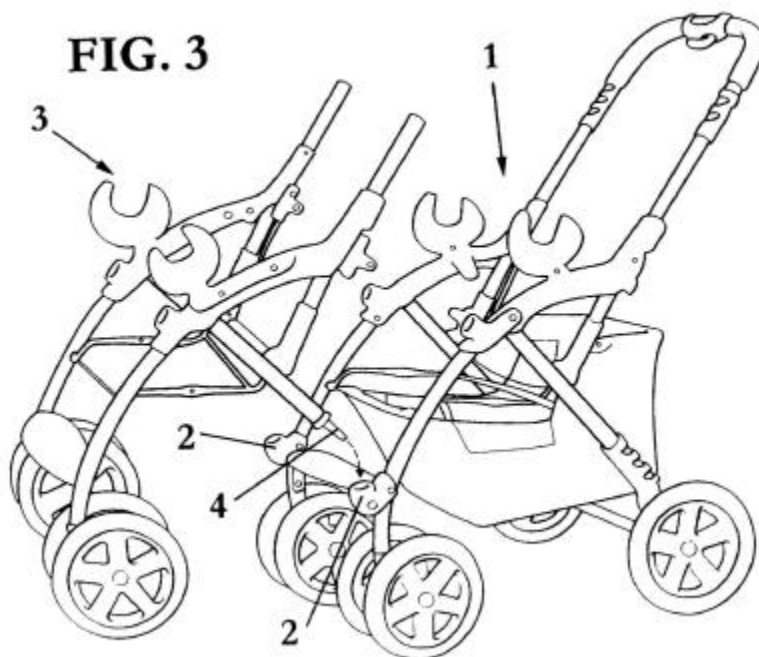
In the prosecution of U.S. Patent 12,275,449, ultimately a Continuation-in-Part of the application underlying the '869 Patent, the Examiner found that Liao disclosed a convertible single-to-double stroller, and found that the stroller of Liao contained a folding mechanism, all of the standard frame elements 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. (EX1068, 950-53.) 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. (Id.) 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.)

B. Spanish Patent ES 2253093 to Stopp

Stopp is a publication of a Spanish patent application. (EX1063, 1.)² Stopp constitutes prior art to the '869 Patent under at least pre-AIA § 102(b) because it was published on May 16, 2006.

Stopp discloses a single stroller that can be converted into a double stroller. (EX1063, 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.*, 2:11-19.) Seats can then be mounted on either stroller, as shown in FIG. 5.

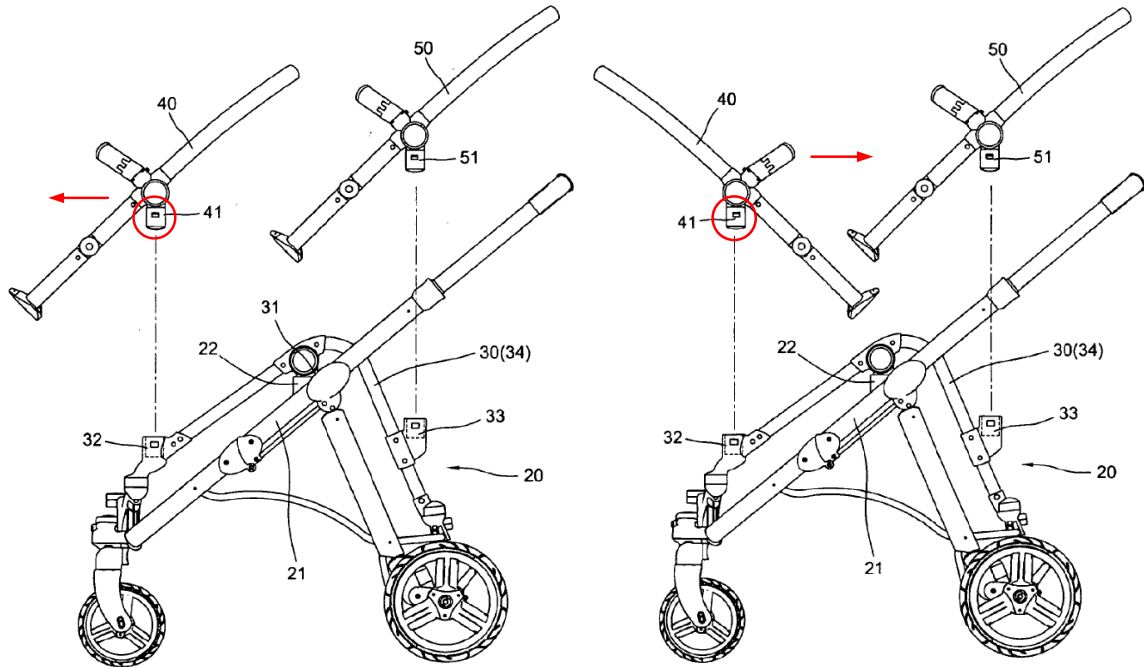


² The certified translation (EX1063) of Stopp is cited herein.

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

Chen is a January 21, 2010, publication of a U.S. patent application that was filed on July 16, 2008. (EX1065.) Accordingly, Chen constitutes prior art under at least (pre-AIA) § 102(e).

Chen discloses a single-seat stroller with an auxiliary frame that plugs into a seat connection of the stroller and supports two seats, as shown in FIGS. 5 and 11. (EX1065, ¶¶ 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

Wun was filed on October 11, 2005, and is therefore prior art under pre-AIA 35 U.S.C. § 102(a). (*Lynk Labs, Inc. v. Samsung Elecs. Co., Ltd.*, 125 F.4th 1120, 1126-27 (Fed. Cir. 2025).)

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

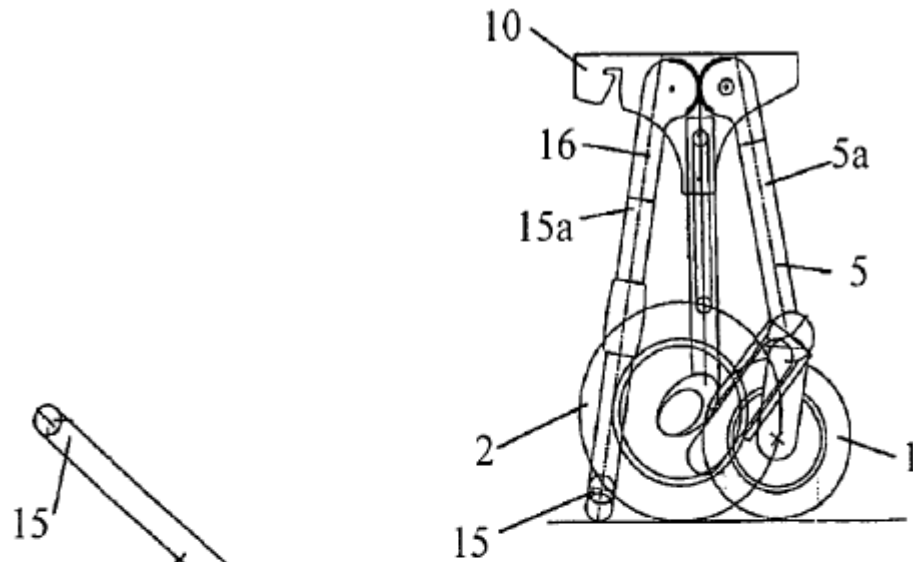


Figure 2

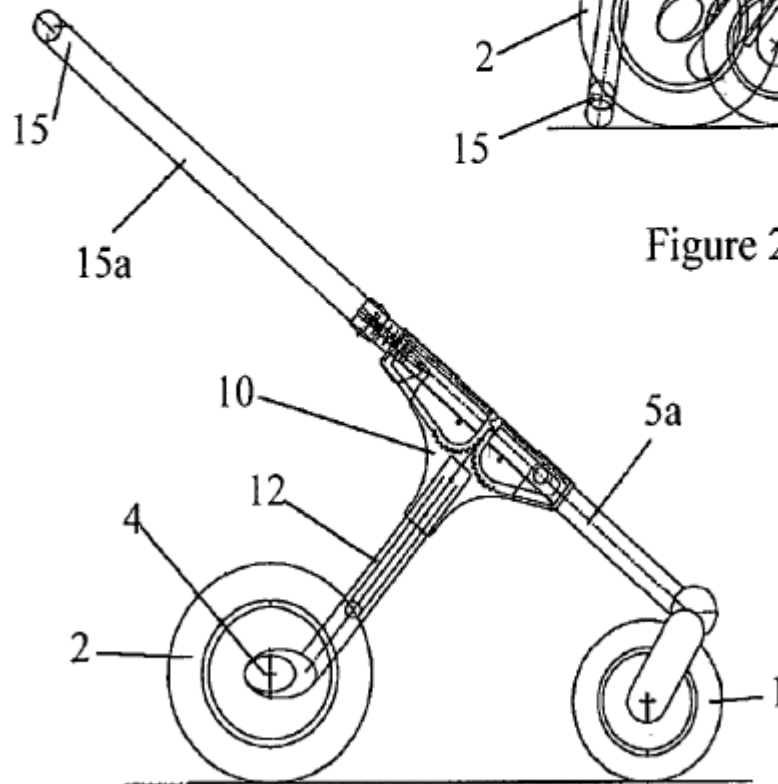
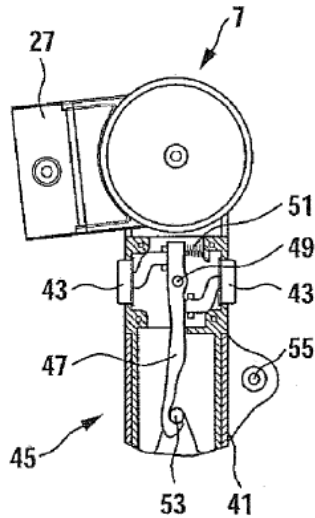
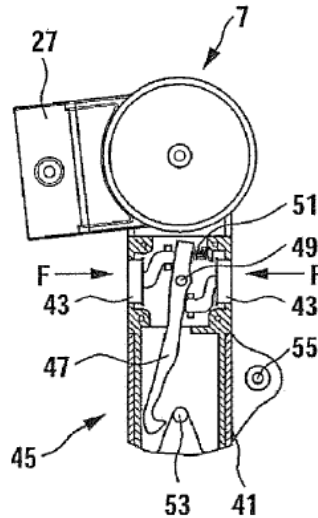
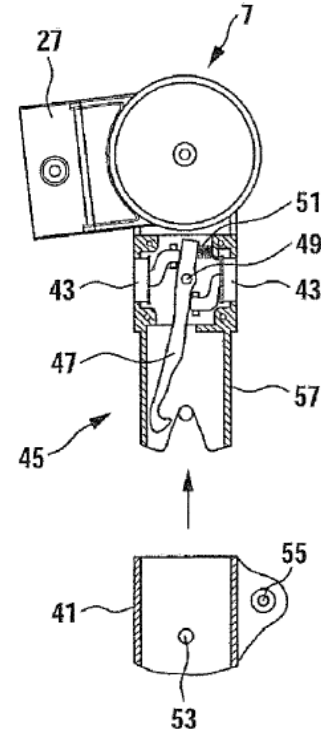


Figure 1

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

Lake was filed on November 19, 2007, and is therefore prior art under pre-AIA 35 U.S.C. § 102(a). (*Lynk Labs*, 125 F.4th at 1123, 1126-27.)

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

Fig. 4a**Fig. 4b****Fig. 4c**

IV. LEVEL OF ORDINARY SKILL

A person of ordinary skill in the art (“POSITA”) 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. 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. (EX1001, ¶¶ 35-37.)

V. CERTIFICATION OF GROUNDS FOR STANDING (37 C.F.R. § 42.104(a))

Petitioner certifies that the '869 Patent is available for IPR and that Petitioner is not barred or estopped from requesting IPR to challenge the claims on the grounds herein.

A. Summary of Challenges and Precise Relief Requested (37 C.F.R. § 42.104(b))

Petitioner requests review and cancellation of the Challenged Claims based on following grounds.

Ground	Claims	Prior Art	Statutory Basis³	Relief Requested
Ground 1	1-30	Liao	§ 103	Invalidation of Claims
Ground 2	1-5, 9-30	Liao in view of Chen	§ 103	Invalidation of Claims
Ground 3	1-30	Stopp	§ 103	Invalidation of Claims
Ground 4	1-5, 9-30	Stopp in view of Chen	§ 103	Invalidation of Claims
Ground 5	13, 14	Stopp in view of Chen, Wun, and Lake	§ 103	Invalidation of Claims

B. Asserted Prior Art

The following references are relied on herein.

Reference	Name	Effective Filing Date
ES 2253093	Stopp	Aug. 6, 2004
US 2010/0013281	Chen	July 16, 2008

³ Pre-AIA law applies.

US D593459	Liao	September 5, 2008
US 2006/0082104	Wun	October 11, 2005
US 2008/0150247	Lake	November 19, 2007

VI. CLAIM CONSTRUCTION

In an IPR proceeding, claims are given their ordinary and customary meaning, which is the meaning understood by a person of ordinary skill in the art (“POSITA”) in view of the patent and file history. (37 C.F.R. § 42.100(b).) This Petition applies the constructions that PO has proposed for the terms “closer” and “adjacent” in copending litigation. (*Western Digital Corp. v. Spex Techs., Inc.*, IPR2018-00082, Paper 11, at *11-12 (PTAB Apr. 25, 2018) (petition based on claim constructions urged by PO satisfies claim construction requirements). Petitioner reserves the right to argue different constructions in other actions.

Under PO’s proposed constructions, the term “adjacent” means “next to” or “nearby,” and the term “closer” means “being nearer in space.” (EX1070, Claim Construction Brief, 17, 21.)

VII. GROUND 1 – LIAO

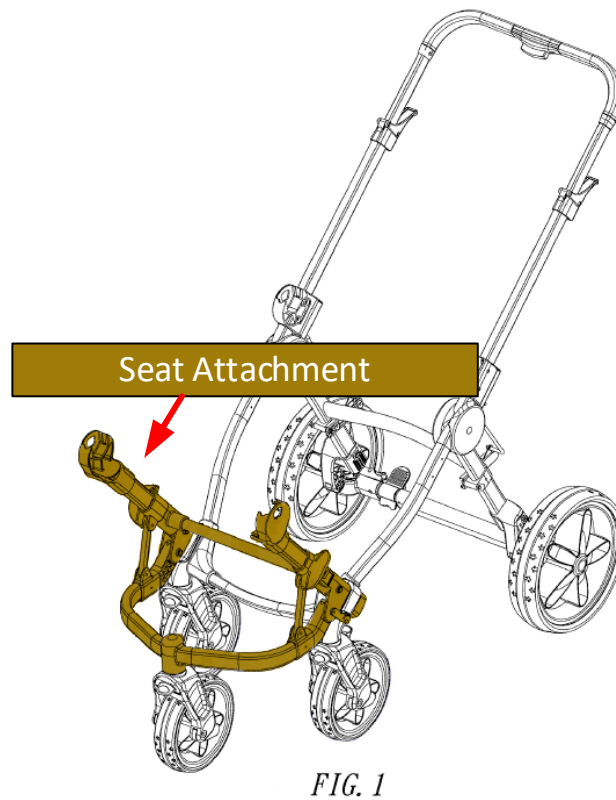
Liao renders obvious claims 1-30.

A. Independent Claims 1 & 24

a) [1(Pre)]/[24(Pre)]

FIG.FIGS. 1, 5 & 11 of Liao illustrate a seat attachment for a stroller.

(EX1001 at ¶ 127; EX1048, FIGS. 1, 5, 11.) FIG.FIGS. 8-13 show removable seats attached to the seat attachment. (*Id.*, FIGS. 8-13, EX1001 at ¶ 127.)

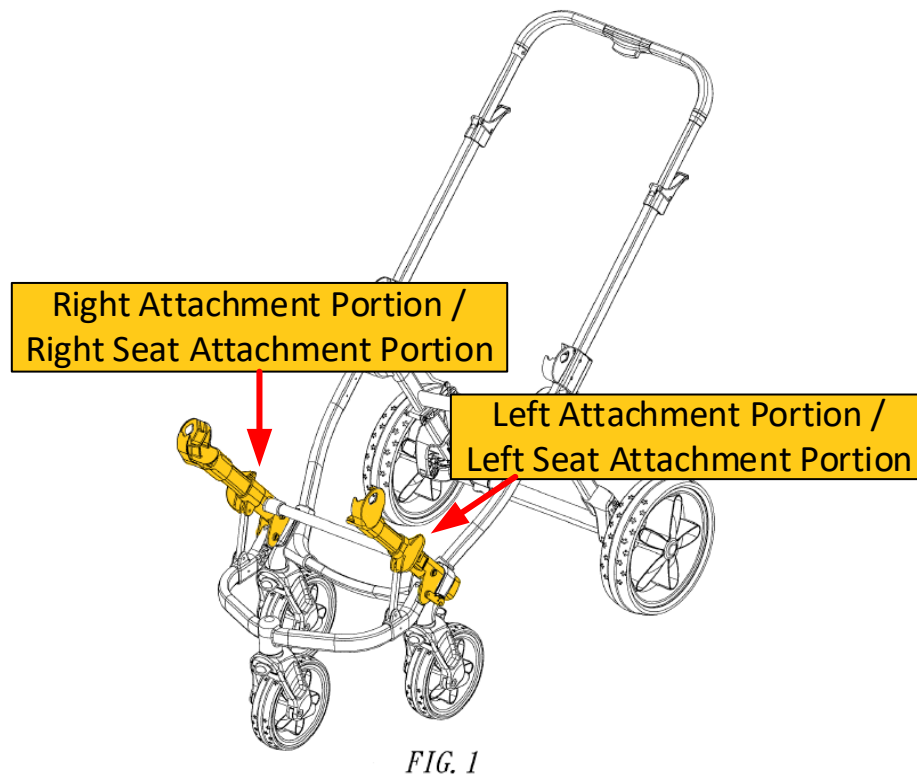


(EX1048, FIG. 1.)

Accordingly, Liao discloses limitations [1(Pre)] and [24(Pre)]. (EX1001 at ¶ 130.)

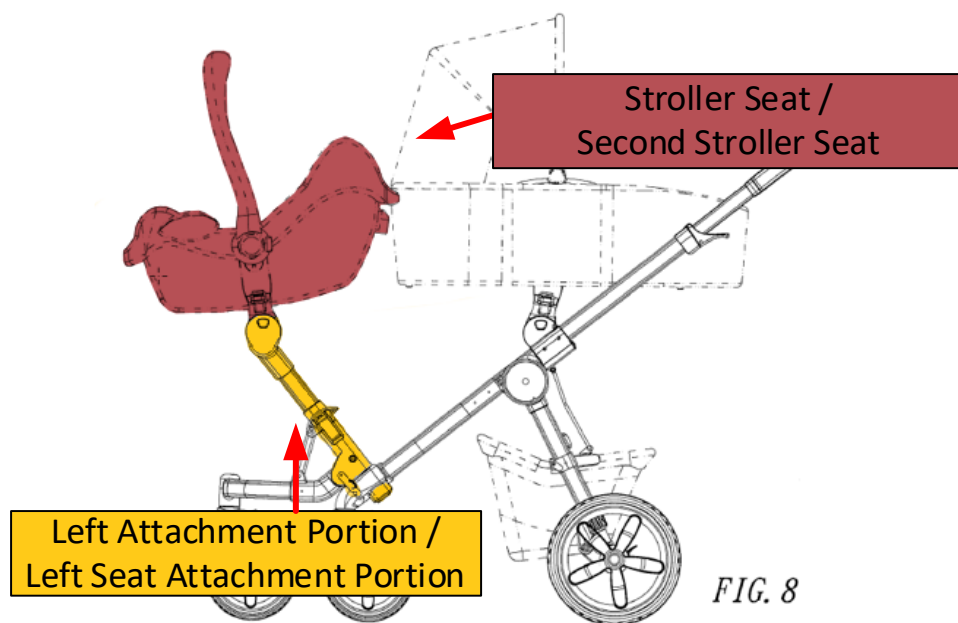
b) [1(a)]/[24(a)]

As shown in FIG.FIGS. 1 and 5, Liao's seat attachment includes left and right attachment portions. (EX1048, FIGS. 1, 5; EX1001 at ¶ 131.) The left attachment portion is separate from the right attachment portion, as shown below. (EX1048, FIG. 1; EX1001 at ¶ 131).



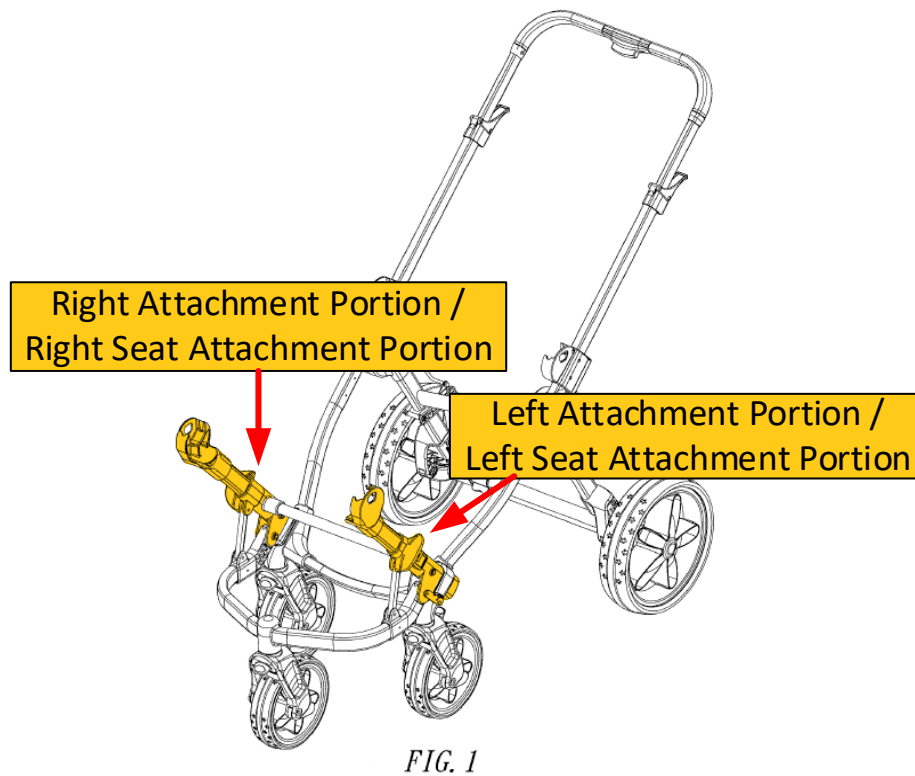
(EX1048, FIG. 1.)

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; EX1001 at ¶ 132.)



(EX1048, FIG. 8.)

Accordingly, Liao discloses [1(a)] and [24(a)]. (EX1001 at ¶ 134.)



(EX1048, FIG. 1.)

c) [1(b)]/[24(b)]

Each (seat) attachment portion of Liao's seat attachment includes a connector portion, labeled below. (EX1048, FIG. 1, 4, 5, 11; EX1001 at ¶ 135). The left connector portion connects to the stroller frame adjacent the left front wheel of the stroller. (EX1048, FIG. 1, 4, 5, 11; EX1001 at ¶ 135.)

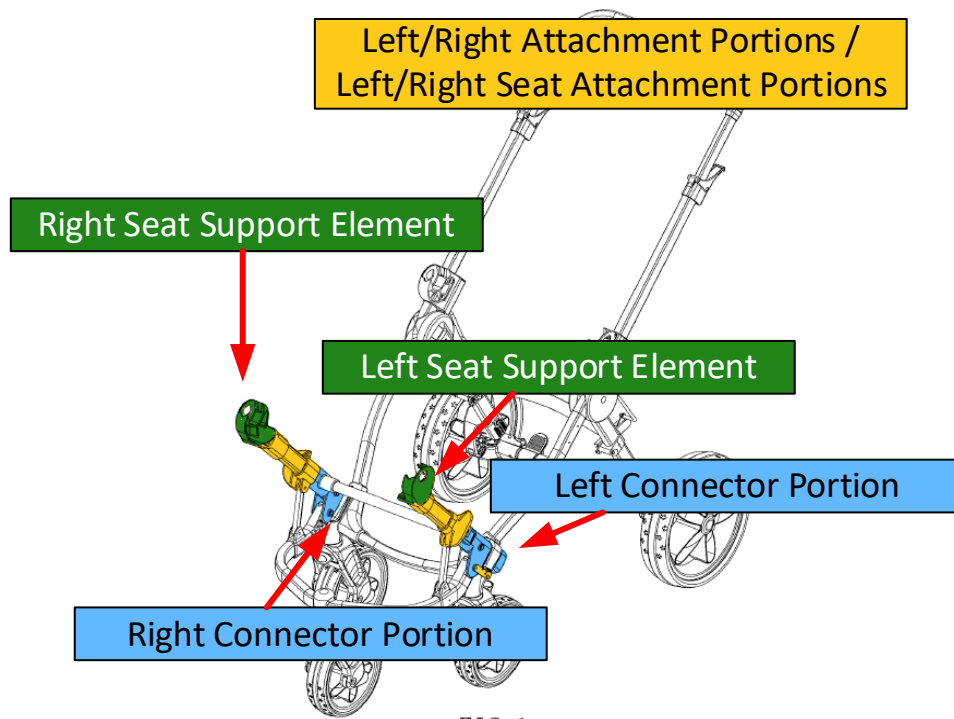


FIG. 1

(EX1048, FIG. 1).

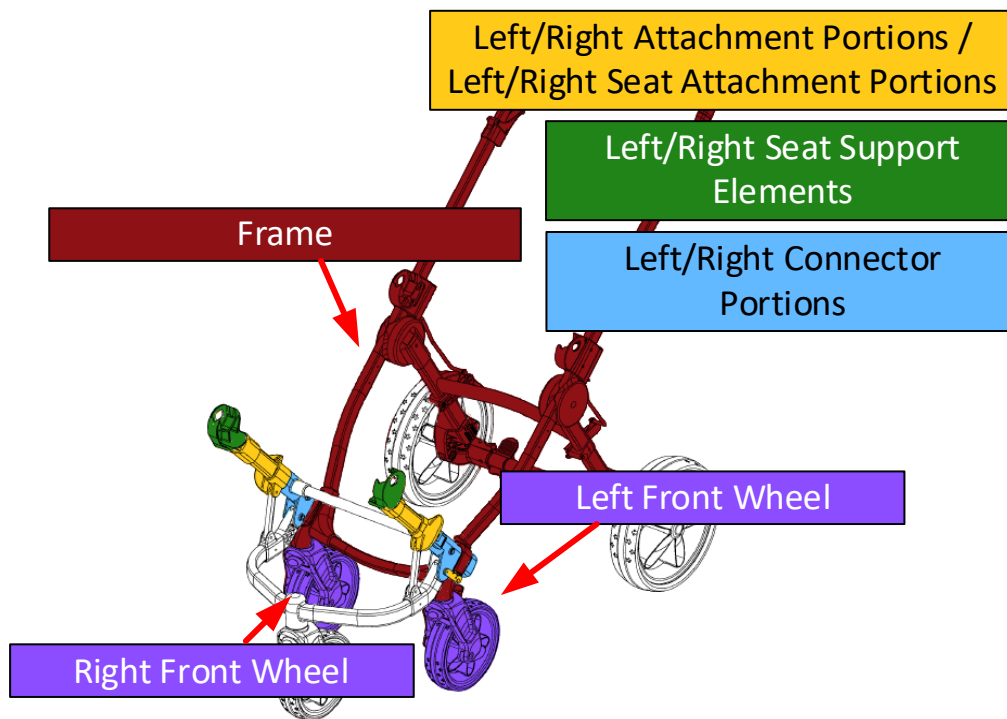
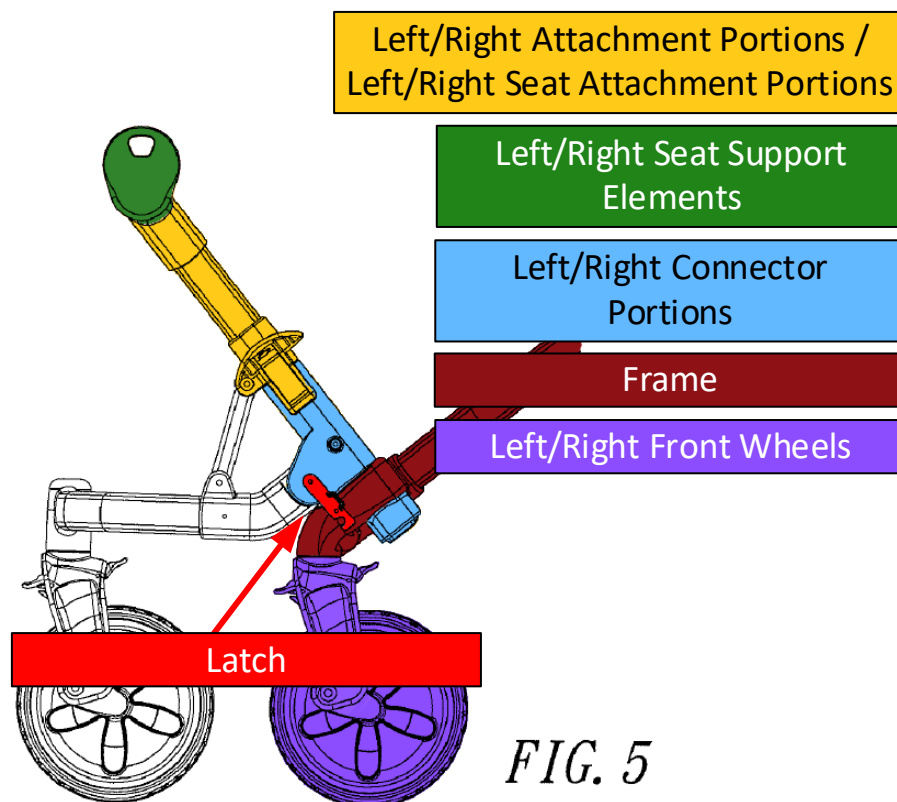


FIG. 1

(*Id.*).

Each connector portion is associated with a latch, shown below. (EX1048, FIG. 5; EX1001 at ¶ 136.) The latch is a mechanism that allows the connector portion to be easily connected to and removed from the stroller frame. (EX1001 at ¶ 136.) A latch would not be present if the connector portion was permanently connected to the stroller frame. (EX1001 at ¶ 136). Therefore, Liao discloses that the connector portion is capable of removably connecting to the stroller frame adjacent the left front wheel. (EX1001 at ¶ 136.)



(EX1048, FIG. 5.).

Liao's attachment portions also include seat support elements, labeled below. (EX1048, FIG. 1; EX1001 at ¶ 138.)

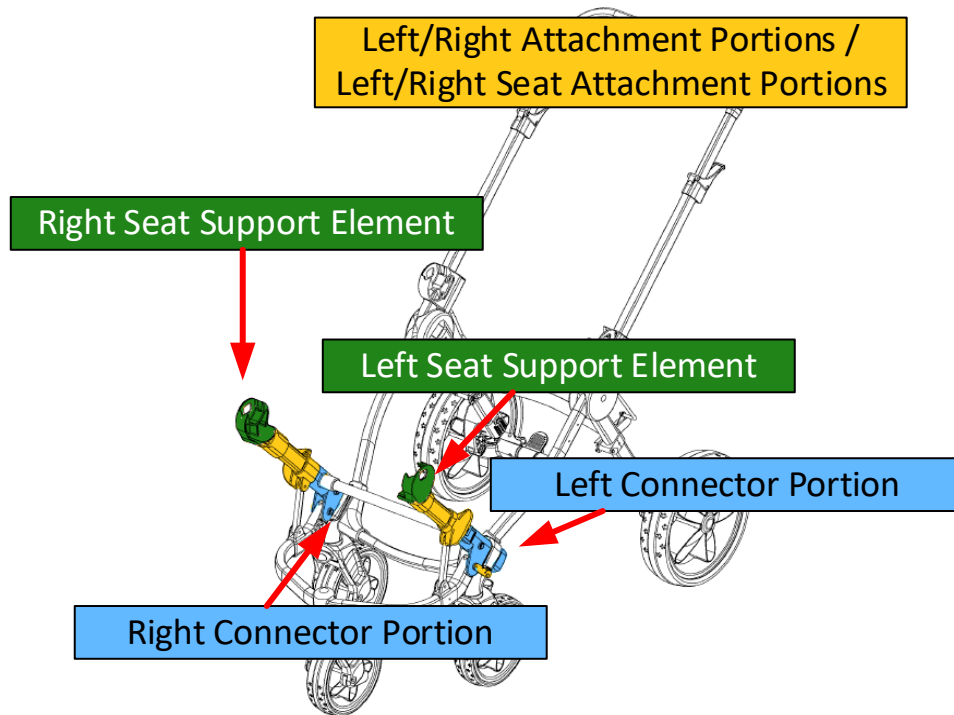
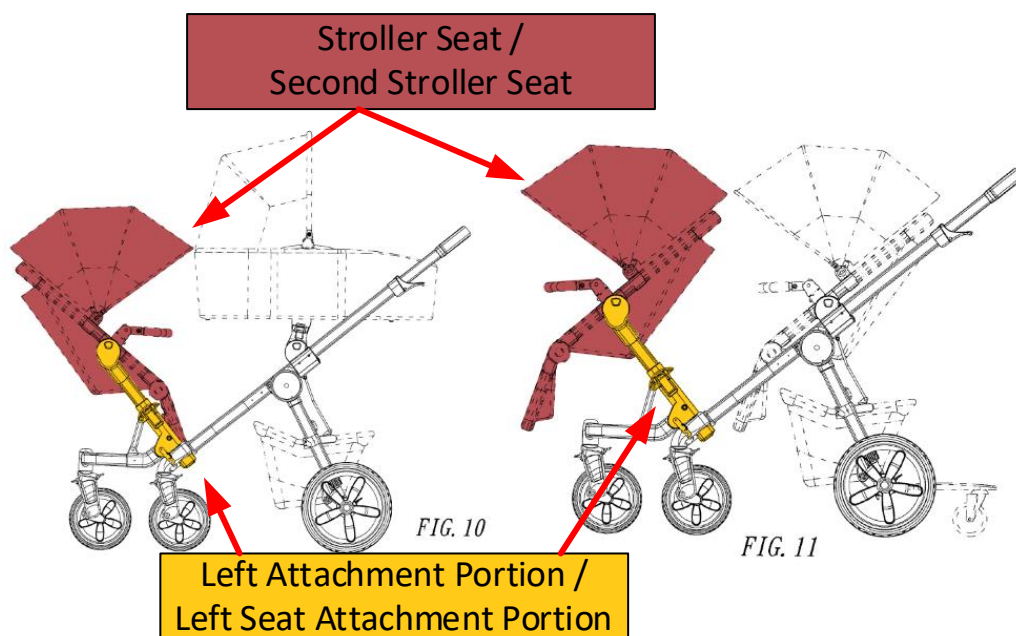
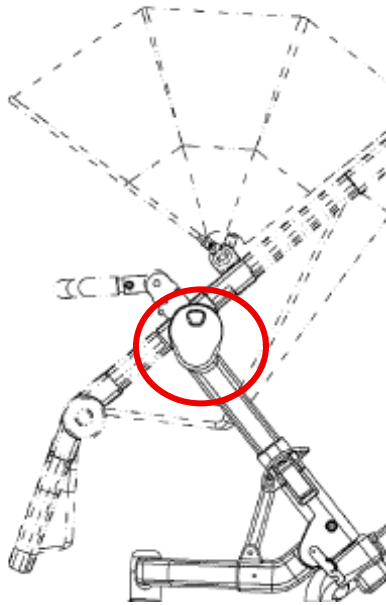


FIG. 1

(EX1048, FIG. 1.) The seat support elements removably connect seats in either a forward or backward position, as shown in FIGS. 10-11. (EX1048, FIGS. 10, 11; EX1001 at ¶ 139.)

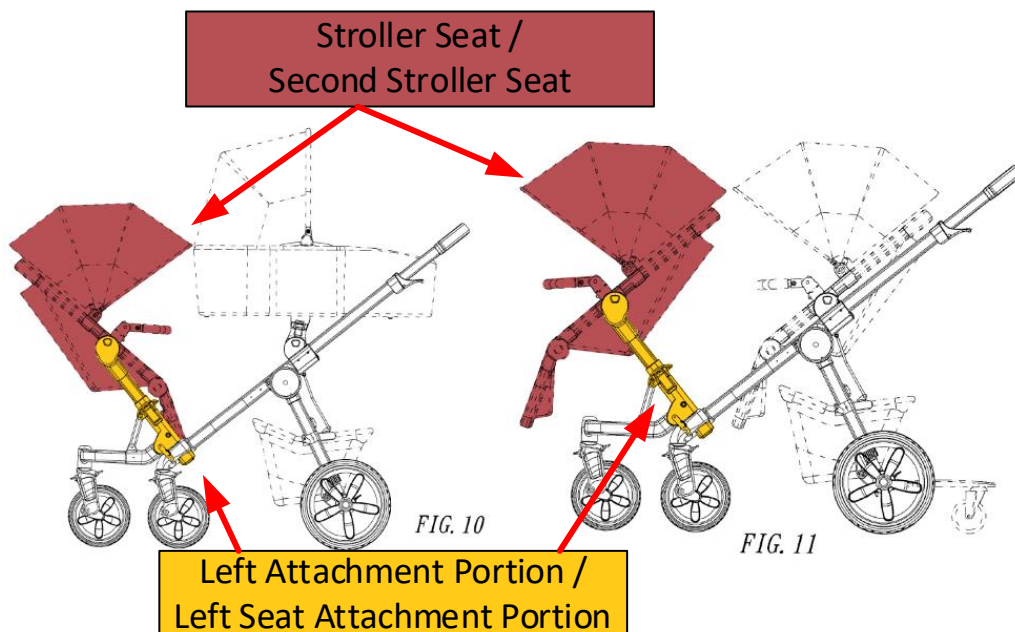


Liao's FIG.FIGS. show different types of seats being connected to the seat support elements, which a POSITA would have understood to mean that the seats are removable and that various types of seats can be used with the frame at various times. (EX1048, FIGS. 8-13; EX1001 at ¶ 140.) Additionally, a POSITA 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; EX1001 at ¶ 140.).



(EX1048, FIG. 11.)

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; EX1001 at ¶ 141.)



Therefore, Liao discloses seat support elements removably connecting a seat in either a forward or backward position. (EX1001 at ¶ 142.)

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; EX1001 at ¶ 145.). 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. (EX1001 at ¶ 145.) 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. (EX1001 at ¶ 145). 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. (EX1001 at ¶ 145.)

Therefore, Liao discloses [1(b)]/[24(b)] or, alternatively, renders it obvious. (EX1001 at ¶ 147.)

d) [1(c)-(d)]/[24(c)-(d)]

Liao's stroller system has left-right symmetry. (EX1048, FIGS. 1-7; EX1001 at ¶ 148.) As shown in the FIG.FIGS. below, the right side of Liao's seat attachment mirrors all the features discussed above that the left side possesses. (EX1048, FIGS. 1-7; EX1001 at ¶ 148.) 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. (EX1048, FIGS. 1-7; EX1001 at ¶ 148.)

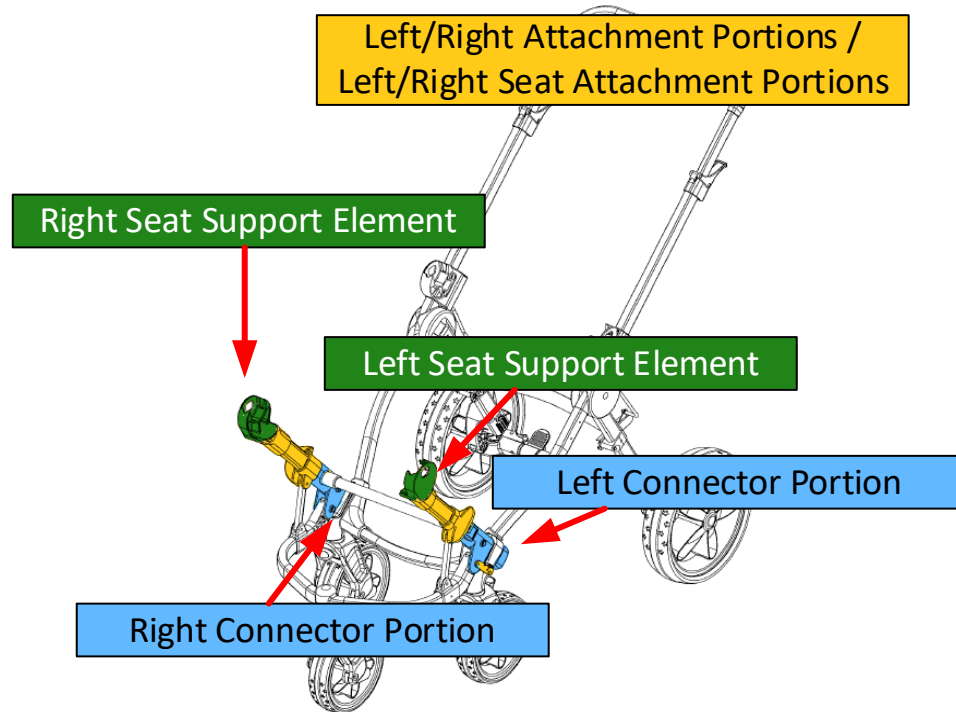


FIG. 1

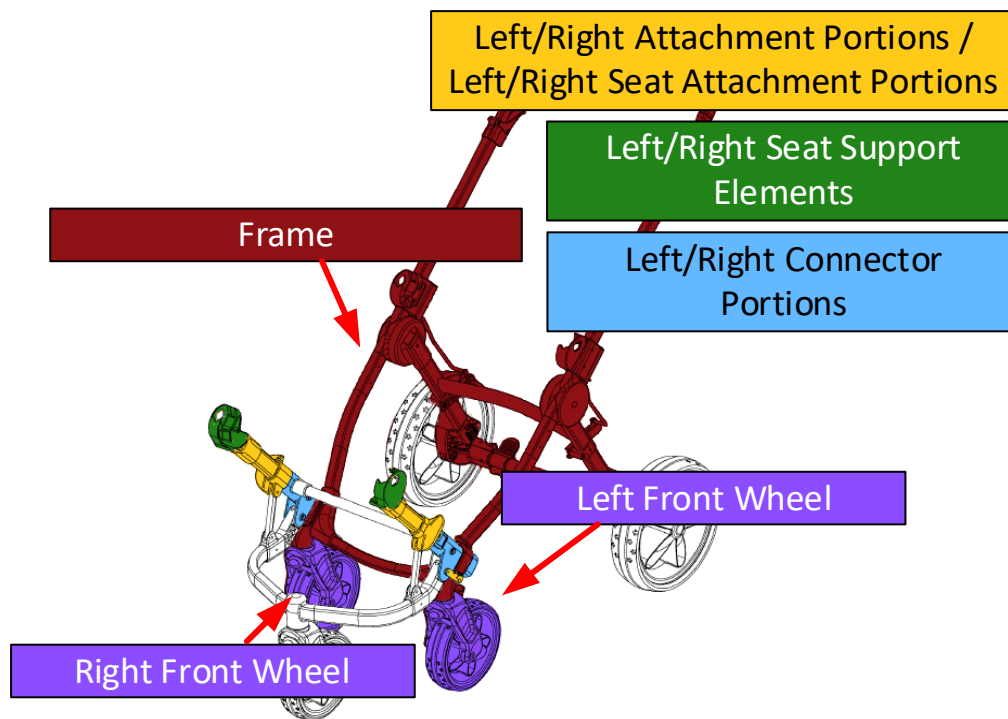
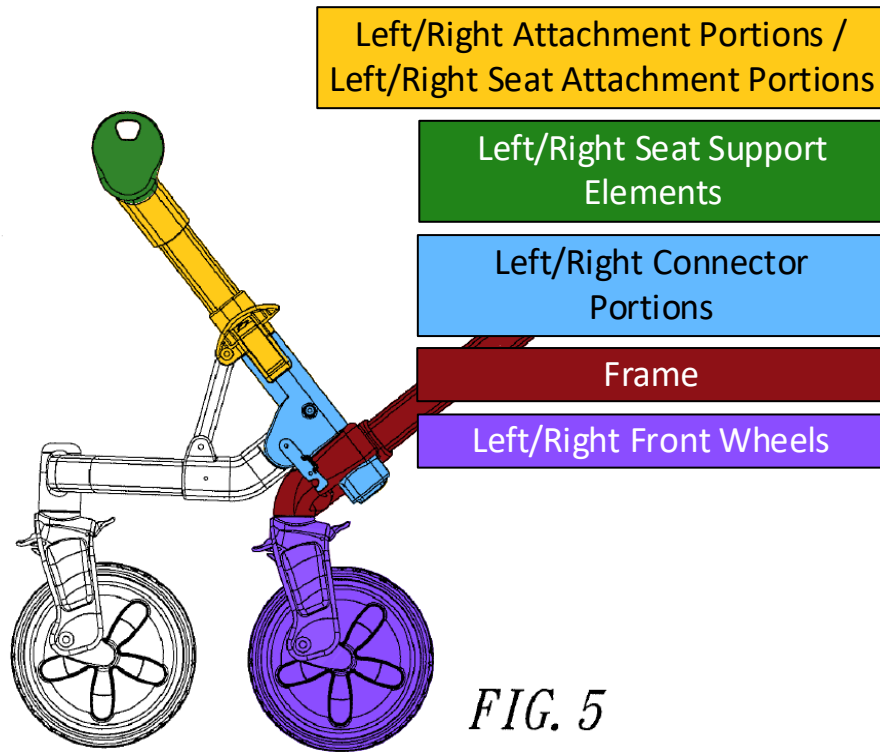


FIG. 1

(EX1048, FIG. 1.)



(EX1048, FIG. 5.)

Additionally, as shown in FIGS. 8-13, the seat is between the left and right seat support elements. (EX1048, FIGS. 8-13; EX1001 at ¶ 151-52.)

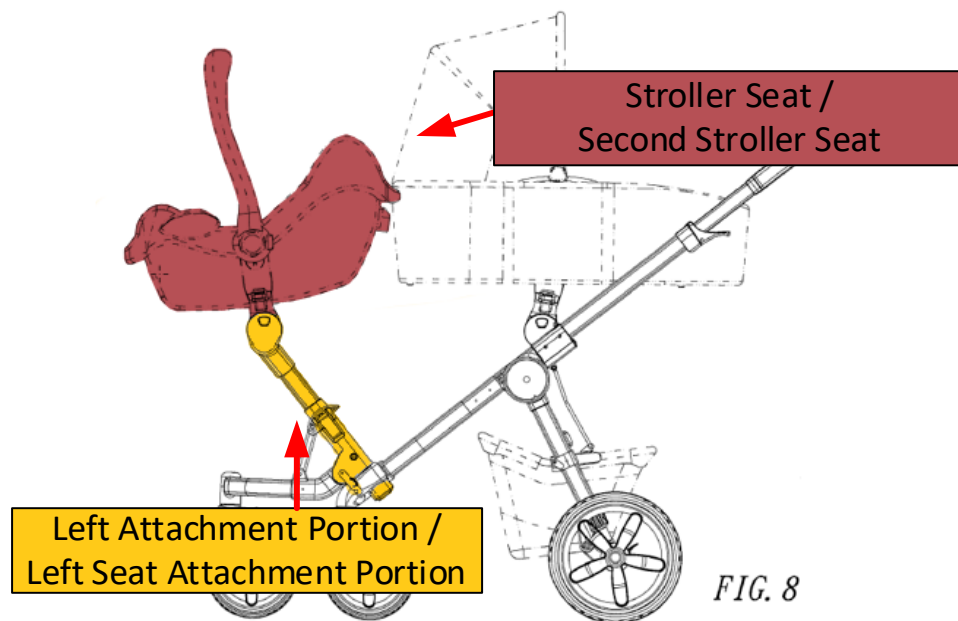
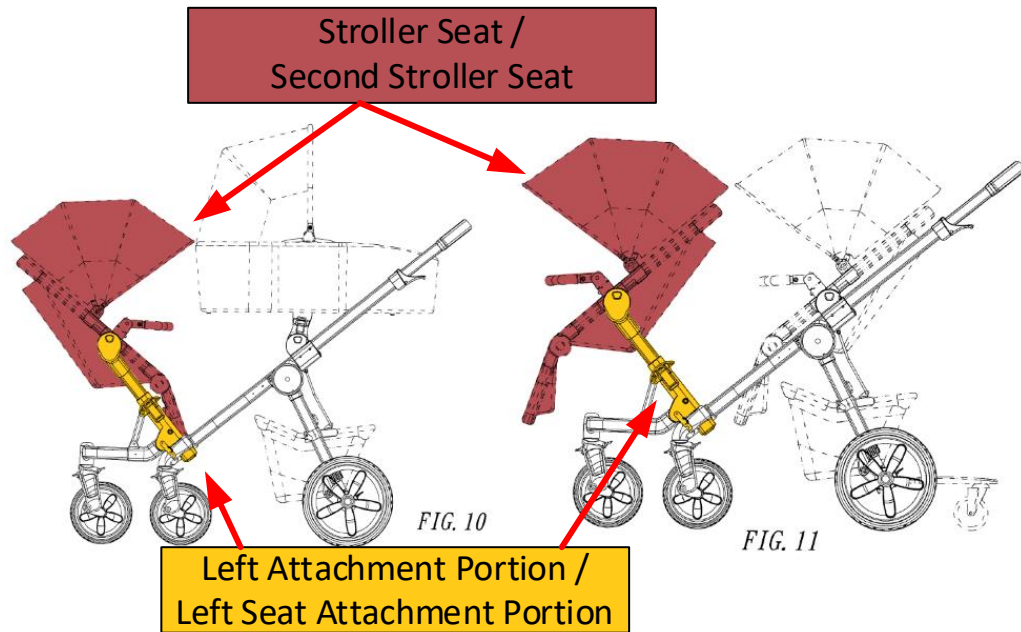
Therefore, Liao discloses limitations [1(c)-(d)]/[24(c)-(d)] or, alternatively, renders them obvious. (EX1001 at ¶ 153.)

B. Claims 2, 25

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). (EX1001 at ¶ 155.) FIG. 8 shows a car seat facing forward and a bassinet facing rearward. (EX1048, FIGS. 8-12; EX1001 at ¶ 155.)

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

(EX1001 at ¶ 156.)

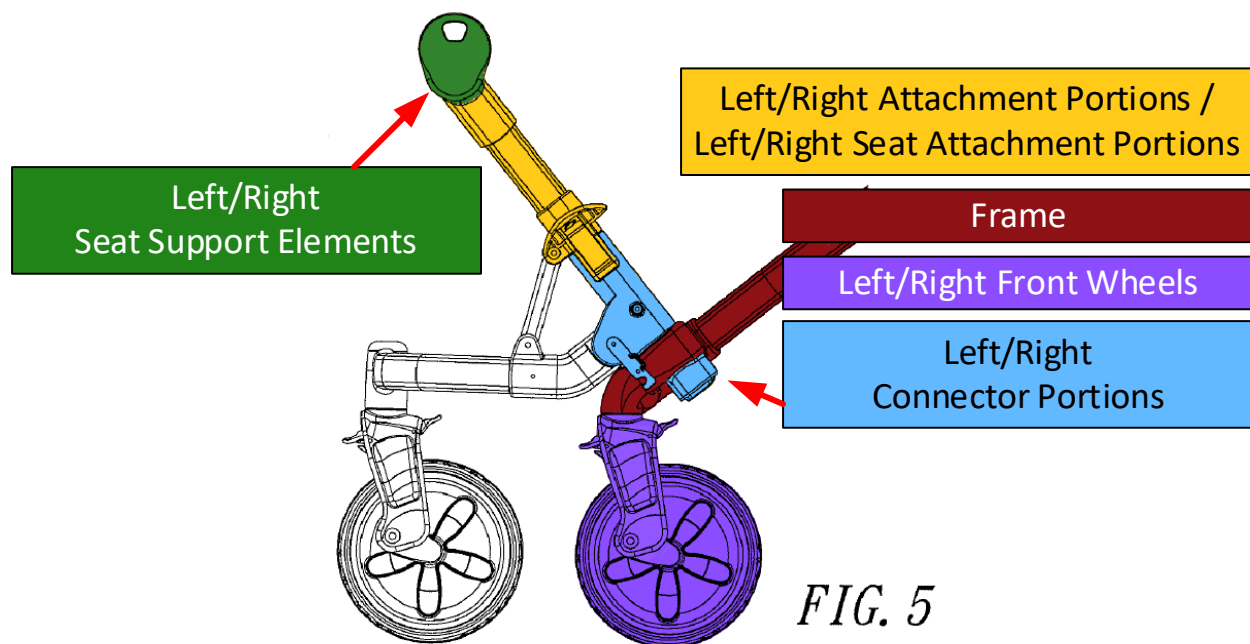


(EX1048, FIGS. 10-11, 8.)

C. Claims 3-5 & 26-28

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

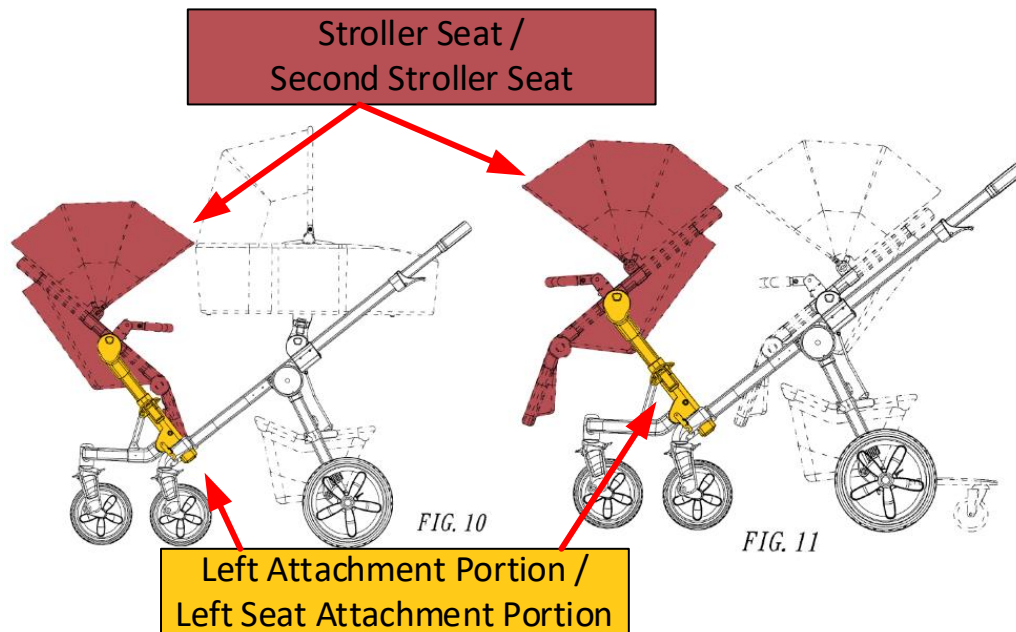
(EX1048, FIG. 5; EX1001 at ¶ 161.) Accordingly, Liao discloses the additional limitations of claims 3/26. (EX1001 at ¶ 161.)



(EX1048, FIG. 5.)

As shown in FIG. 5 (above), each first end connects directly to the stroller frame. (EX1048, FIG. 5; EX1001 at ¶ 162.) Therefore, Liao discloses the additional limitations of claims 4/27. (EX1001 at ¶ 162.)

As shown in FIGS. 8-12, each second end is connected to the seat. (EX1048, FIGS. 8-12; EX1001 at ¶ 163.) Therefore, Liao discloses the additional limitations of claims 5/28. (EX1001 at ¶ 163.)

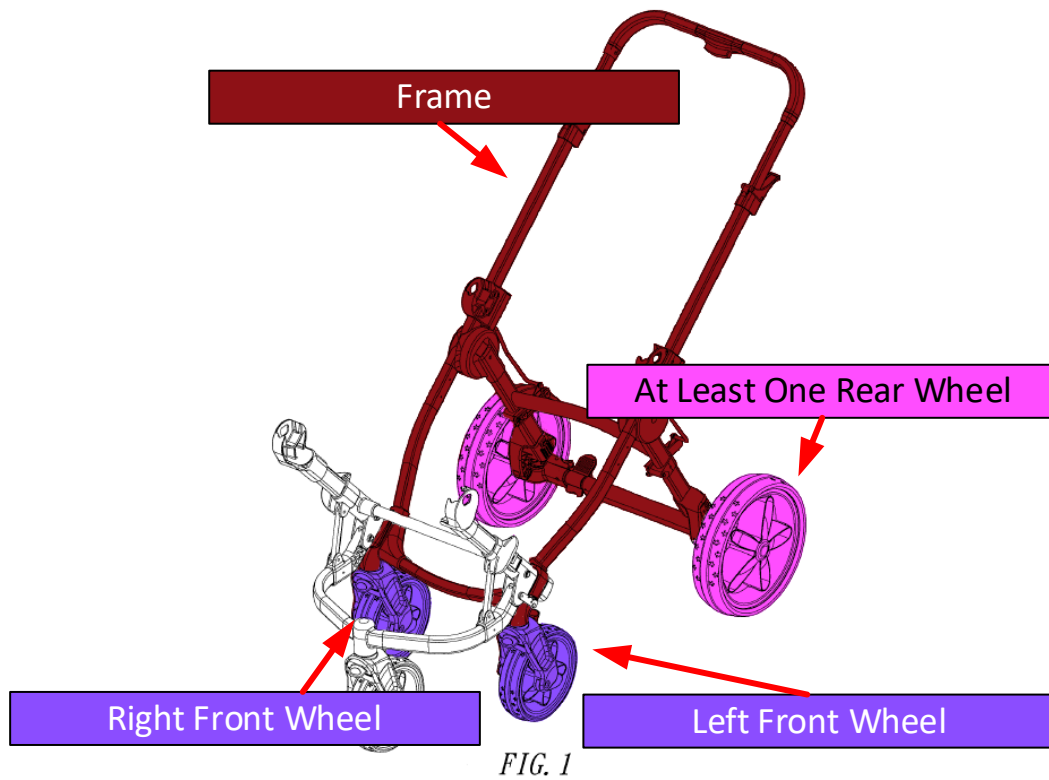


(EX1048, FIGS. 10-11.)

D. Independent Claim 6

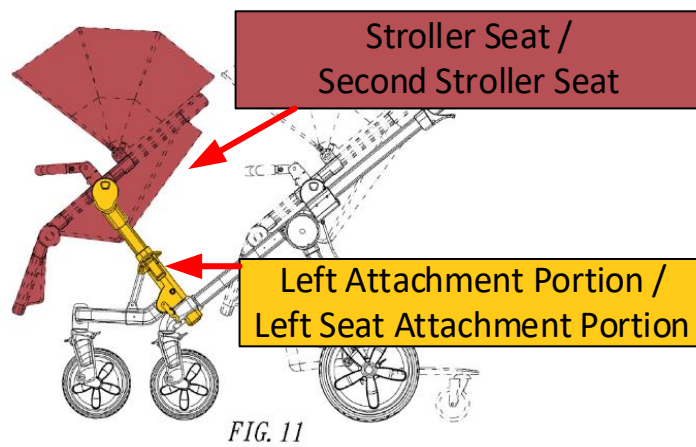
a) [6(Pre)-(d)]

Liao discloses a stroller comprising a frame, two front wheels, and at least one rear wheel, as labeled below. (EX1048, FIG. 1; EX1001 at ¶ 170.)



(EX1048, FIG. 1.)

Liao also discloses a stroller seat, labeled below. (EX1048, FIG. 11; EX1001 at ¶ 171.)



(EX1048, FIG. 11.)

Therefore, Liao discloses [6(Pre)-(d)]. (EX1001 at ¶ 172.)

b) [6(e)]-[6(f)]

Liao discloses two attachment frame members connected to the frame adjacent to the front wheels, labeled below. (EX1048, FIG. 1; EX1001 at ¶ 173.)

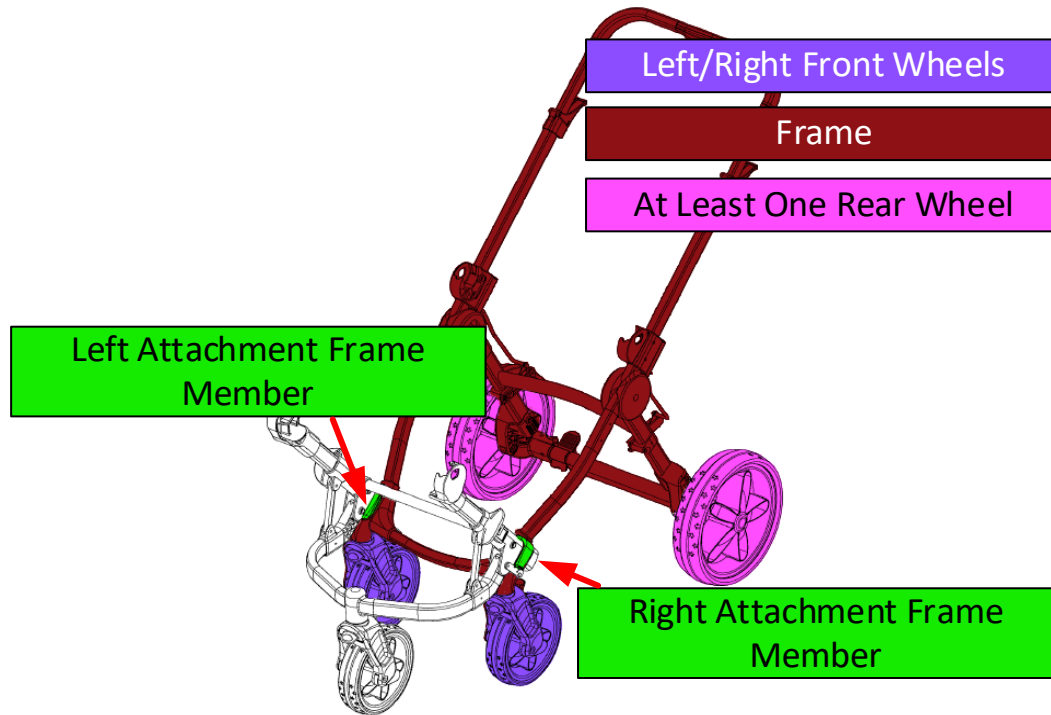


FIG. 1

Therefore, Liao discloses limitation [6(e)]. (EX1001 at ¶ 175.)

The attachment frame members (labeled above) are a part of the stroller adjacent the front wheels into which the connector portions insert. (EX1048, FIG. 1; EX1001 at ¶ 176, 177.) 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; EX1001 at ¶ 176.) The attachment frame

members are removably connected using the latches. (EX1001 at ¶ 176.) As such, the attachment frame members are capable of removably receiving and supporting the seat attachment portions, and Liao discloses limitation [6(f)]. (EX1001 at ¶ 176, 177.) 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. (EX1001 at ¶ 176.)

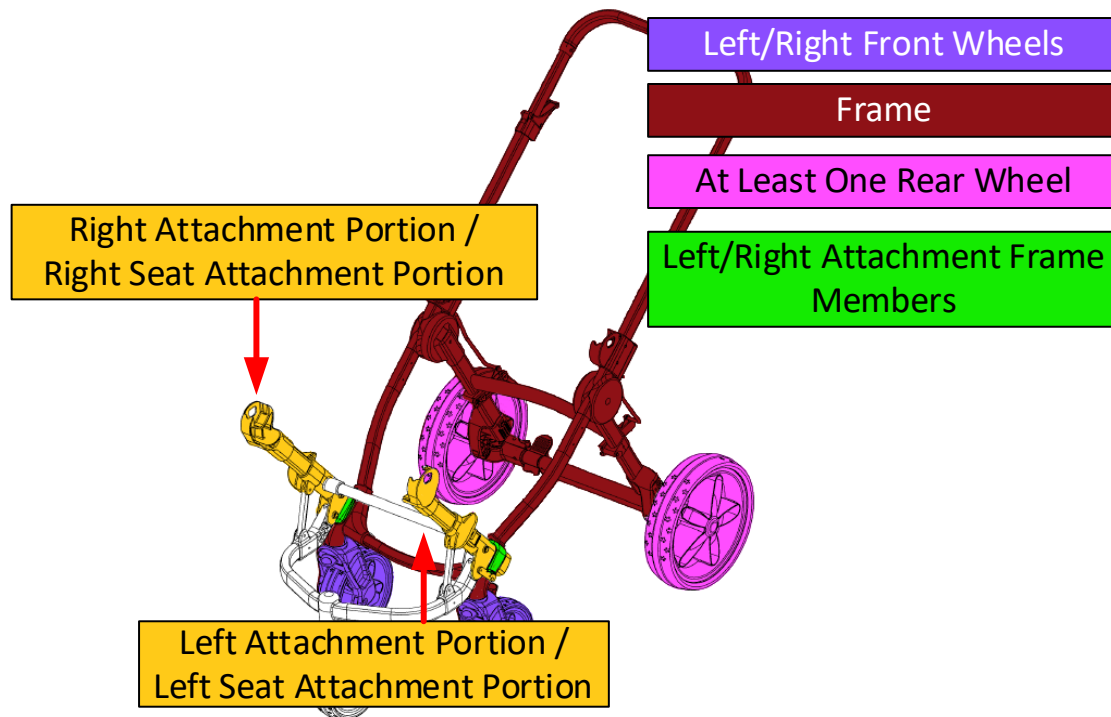


FIG. 1

c) [6(g)]

Liao discloses connector portions and seat attachment portions. (EX1048, FIGS. 1, 4, 10, 11; EX1001 at ¶ 178.) 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. (EX1048, FIGS. 1, 4, 10, 11; EX1001 at ¶ 178.)

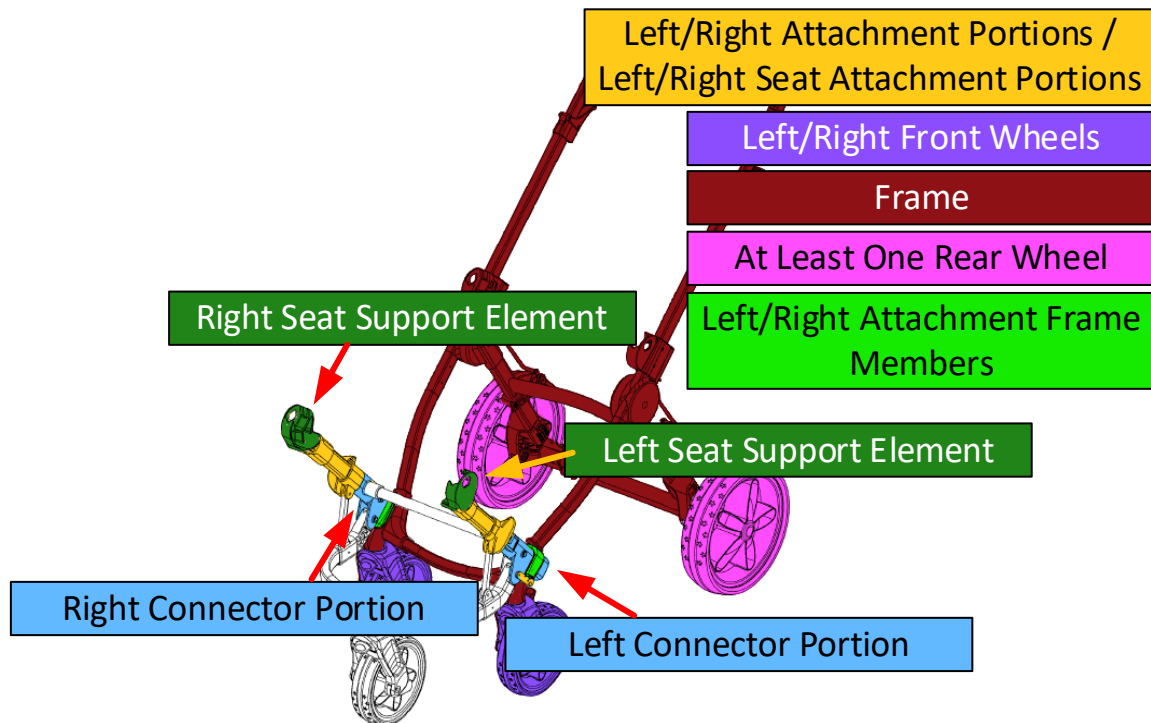


FIG. 1

(EX1048, FIG. 1.)

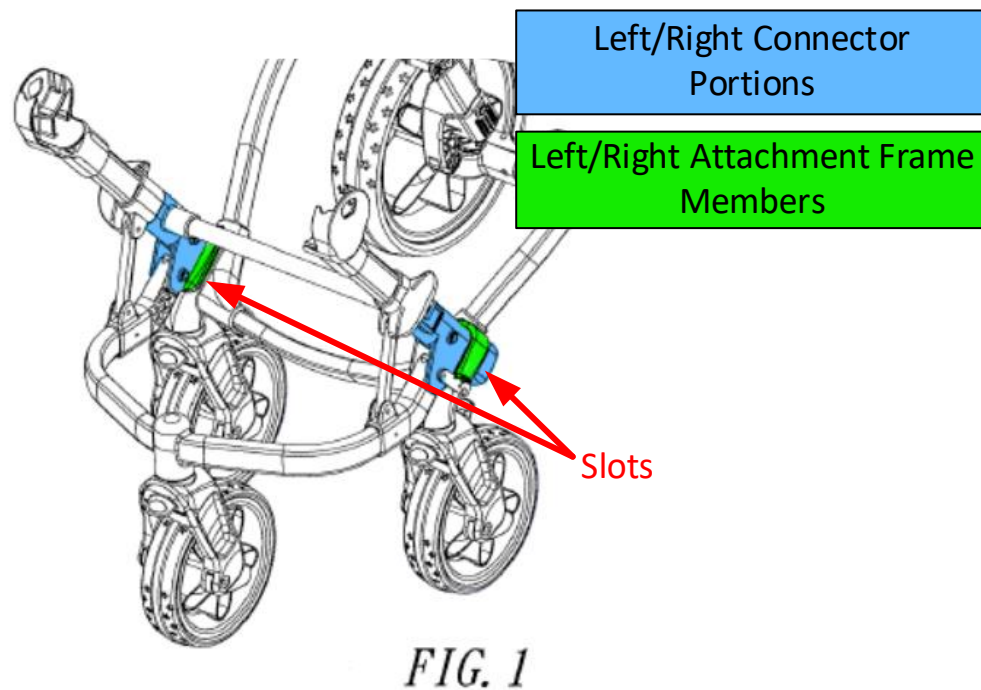
There are two seat attachment portions and two connector portions, and the front seat is connected between the seat attachment portions. (EX1048, FIG. 1; EX1001 at ¶ 179.) Liao discloses or, alternatively, renders obvious, that each seat support element removably connects a stroller seat between the seat attachment portions. (*Supra* § VII(A)(c)-(d).) (EX1001 at ¶ 179.)

Accordingly, Liao discloses or, alternatively, renders obvious limitation [6(g)]. (EX1001 at ¶ 180.)

E. Claim 7

As shown below, Liao's attachment frame members include slots for removably receiving the connector portion of the seat attachment portion.

(EX1048, FIG. 1; EX1001 at ¶ 181.)

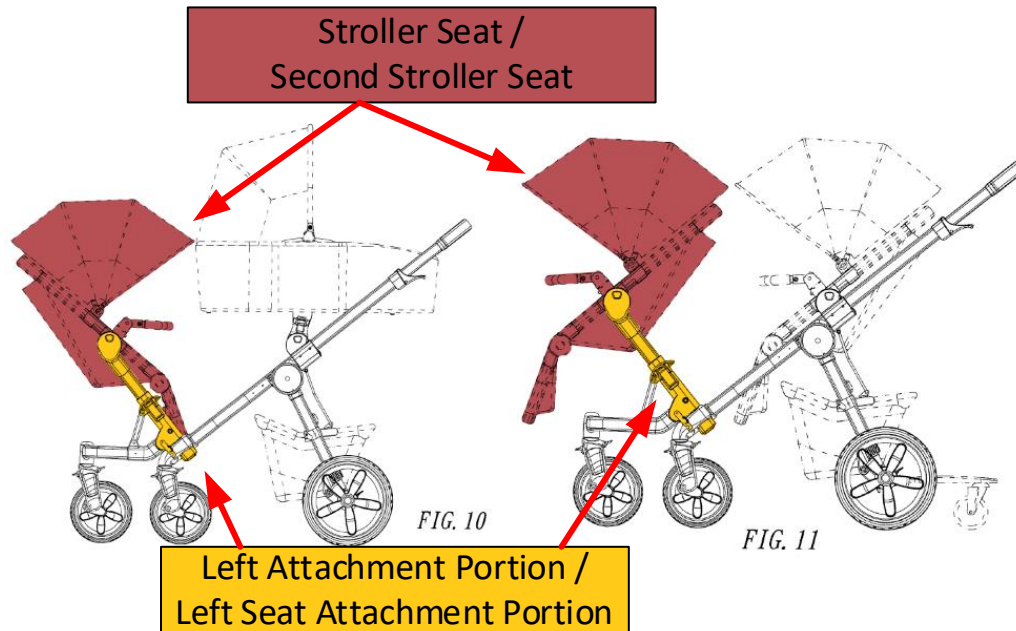


(EX1048, FIG. 1.)

Accordingly, Liao discloses the additional limitations of claim 7. (EX1001 at ¶ 182.)

F. Claim 8

Liao shows the stroller frame supporting stroller seats, car seats, and bassinets. (EX1048, FIGS. 8-12; EX1001 at ¶ 183.) The rear seat can be supported on the frame, and the front seat can be supported by the attachment portions. (EX1048, FIGS. 8-12; EX1001 at ¶ 183.)



(EX1048, FIGS. 8-9.)

Accordingly, Liao discloses the additional limitations of claim 8. (EX1001 at ¶ 185.)

G. Independent Claim 9

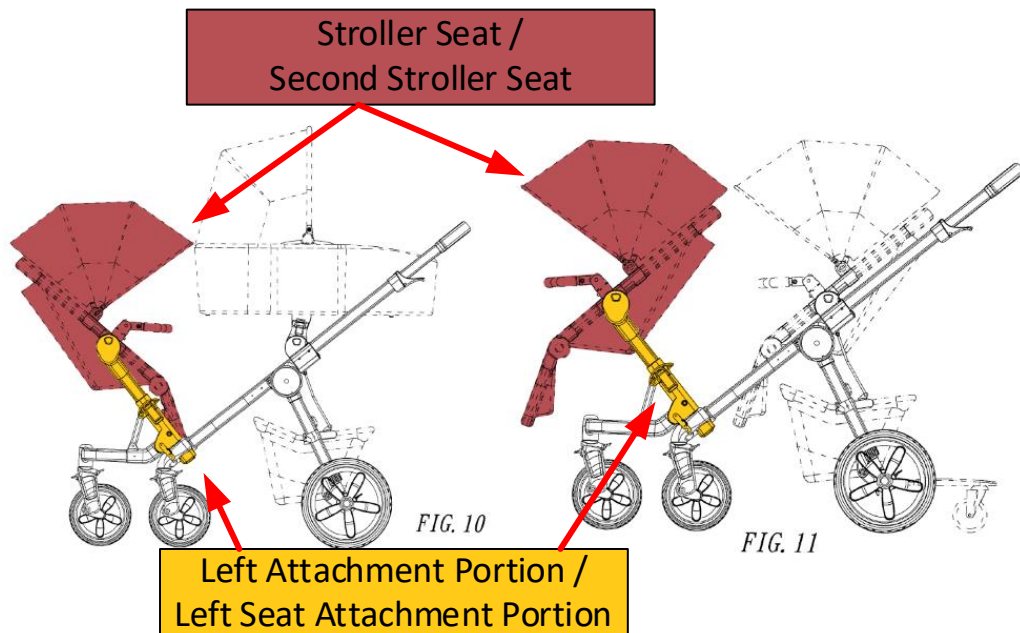
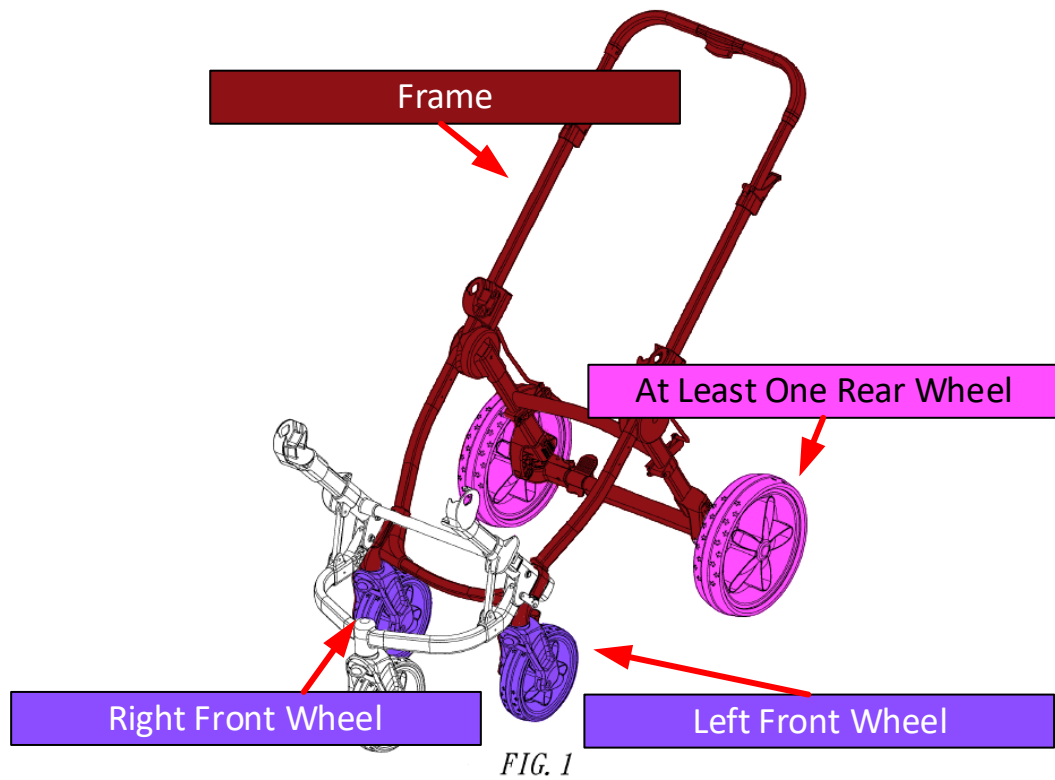
a) [9(Pre)-(a)]

Liao discloses a stroller. (EX1048, FIG. 1; EX1001 at ¶ 186.) 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; EX1001 at ¶ 186.) Figs. 10 and 11 show the rear seat facing backwards and forwards. (EX1048, FIGS. 1, 10, 11; EX1001 at ¶ 186.) The frame also includes rear wheels, and a handle, as it is a fully functional stroller frame. (EX1048, FIGS. 1, 10, 11; EX1001 at ¶ 186)

Furthermore, each seat of Liao uses the same connection means to couple to the seat support element. (EX1048, FIGS. 1, 8-12; EX1001 at ¶ 187.) FIGS. 10 and 11 of Liao show the same front seat facing both forward and backward. (EX1048, FIGS. 1, 8-12; EX1001 at ¶ 187.) 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. (EX1048, FIGS. 1, 8-12; EX1001 at ¶ 187.) However, if PO argues that Liao does not disclose reversible seats, then such a feature would have been obvious in view of Liao. (EX1001 at ¶ 187.)

Accordingly, Liao discloses or, alternatively, renders obvious limitations [9(Pre)-(a)]. (EX1001 at ¶ 188.)



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

b) [9(b)-(c)]

Liao discloses attachment frame members on either side of the stroller. (EX1048, FIGS. 1, 5; EX1001 at ¶ 189.) 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. (EX1048, FIGS. 1, 5; EX1001 at ¶ 189) There are left and right attachment frame members that are coupled adjacent, respectively, the left and right front wheels, as shown by FIG. 4. (EX1048, FIG. 4; EX1001 at ¶ 189.) This is also evident from the previously established left-right symmetry of Liao, as shown in FIGS. 4 and 5. (EX1048, FIGS. 4, 5; EX1001 at ¶ 189.) 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; EX1001 at ¶ 189.)

Accordingly, Liao discloses limitations [9(b)-(c)]. (EX1001 at ¶ 190.)

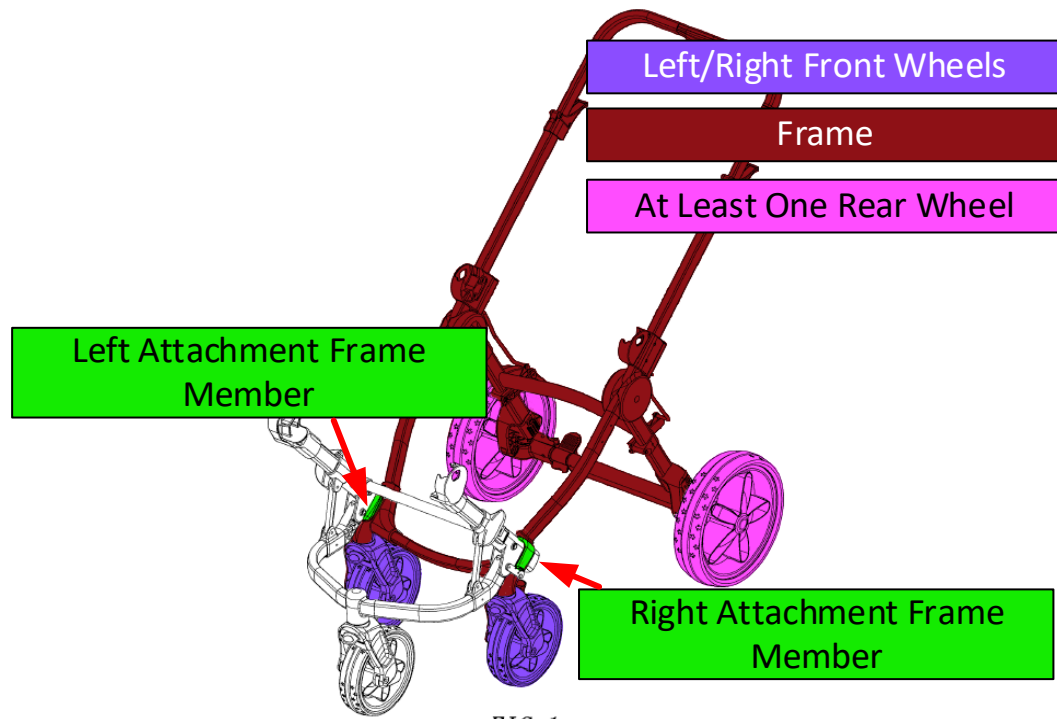


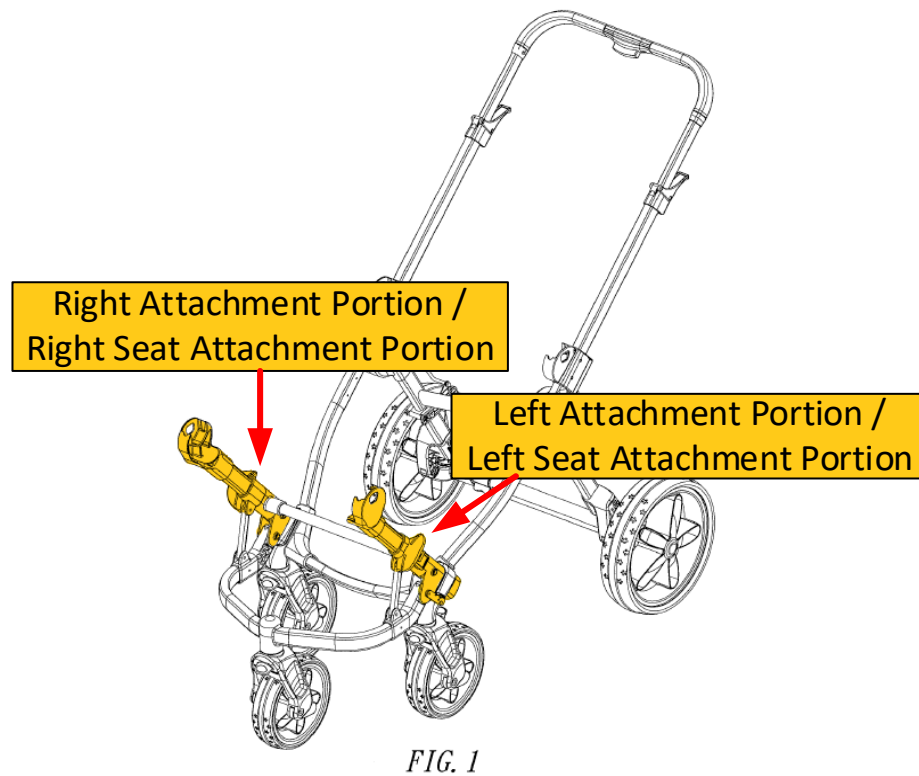
FIG. 1

(EX1048, FIG. 1.)

c) [9(d)]

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; EX1001 at ¶ 191.)

Accordingly, Liao discloses limitation [9.d]. (EX1001 at ¶ 192.)



(EX1048, FIG. 1.)

d) [9(e)-(f)]

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; EX1001 at ¶ 193.) The connector portion inserts into the slot, and is latched to the attachment frame member by the latch. (EX. 1048, FIGS. 1, 5; EX1001 at ¶ 193.) The seat support element is the top of the attachment portion engageable, as shown in FIGS. 10 and 11, to a seat.

(EX1048, FIGS. 10, 11; EX1001 at ¶ 193.) 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; EX1001 at ¶ 193.)

Accordingly, Liao discloses limitations [9(e)-(f)]. (EX1001 at ¶ 194.)

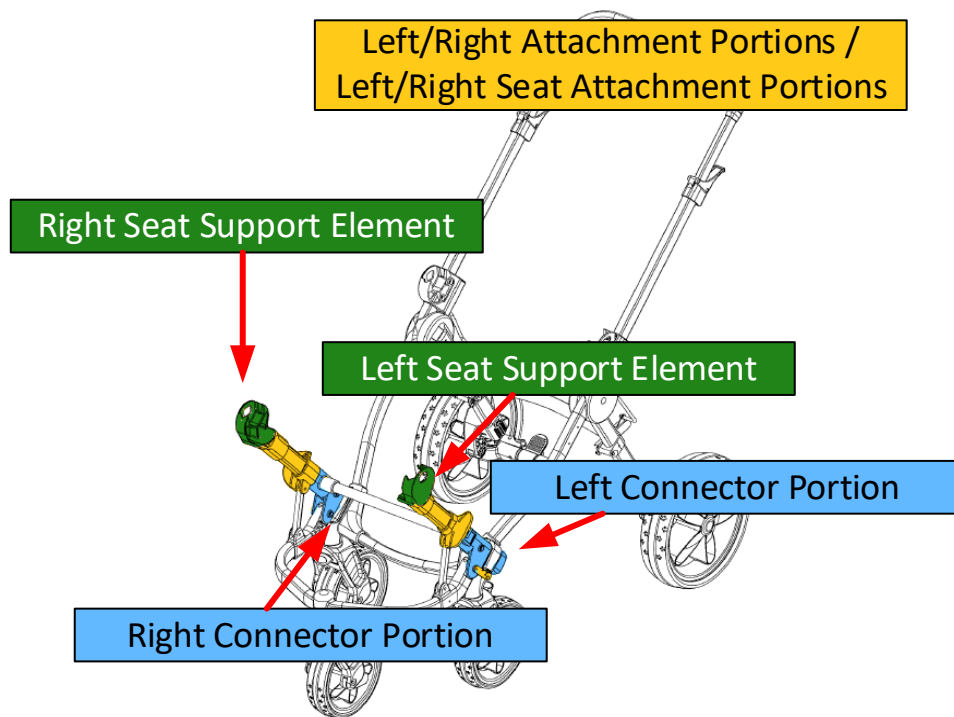
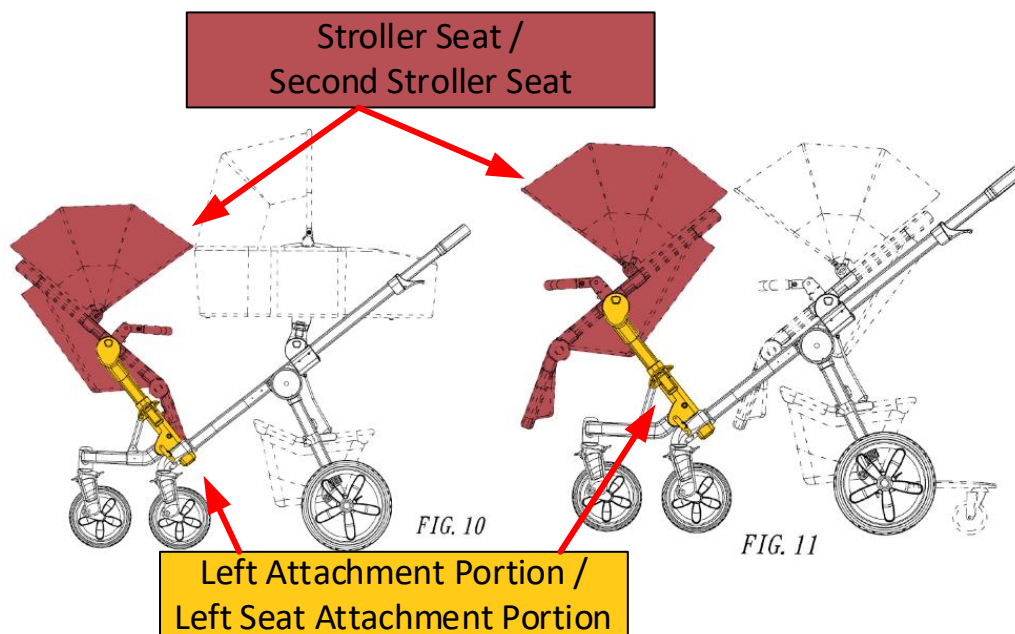
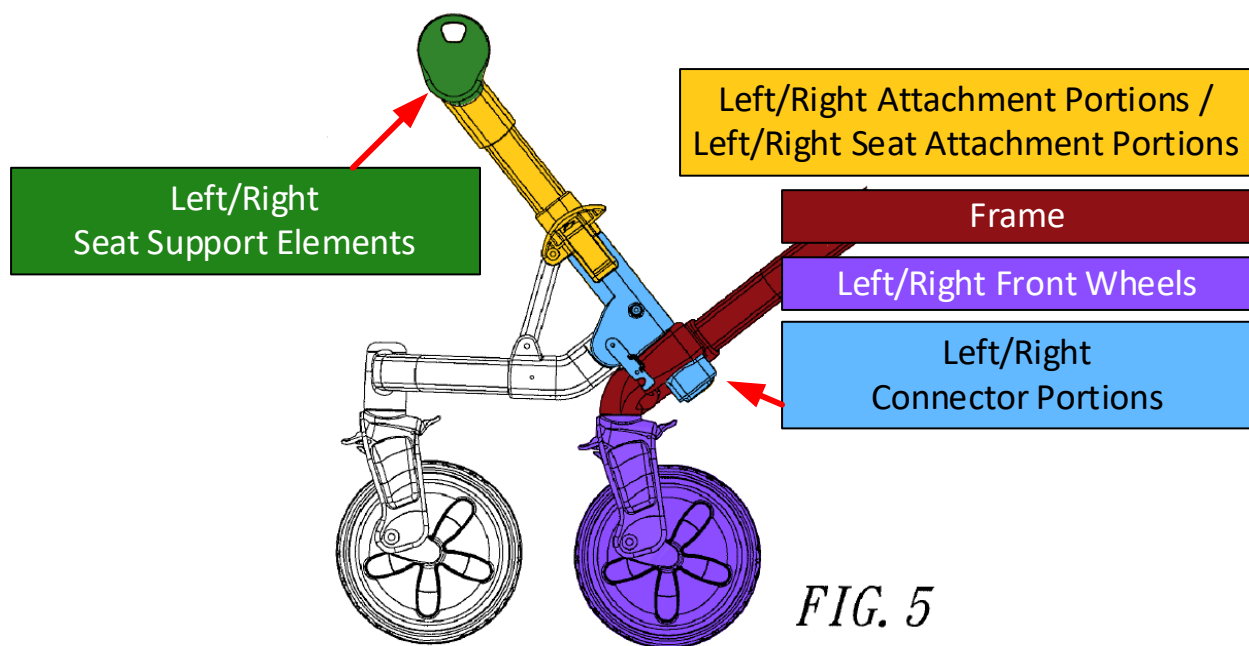


FIG. 1

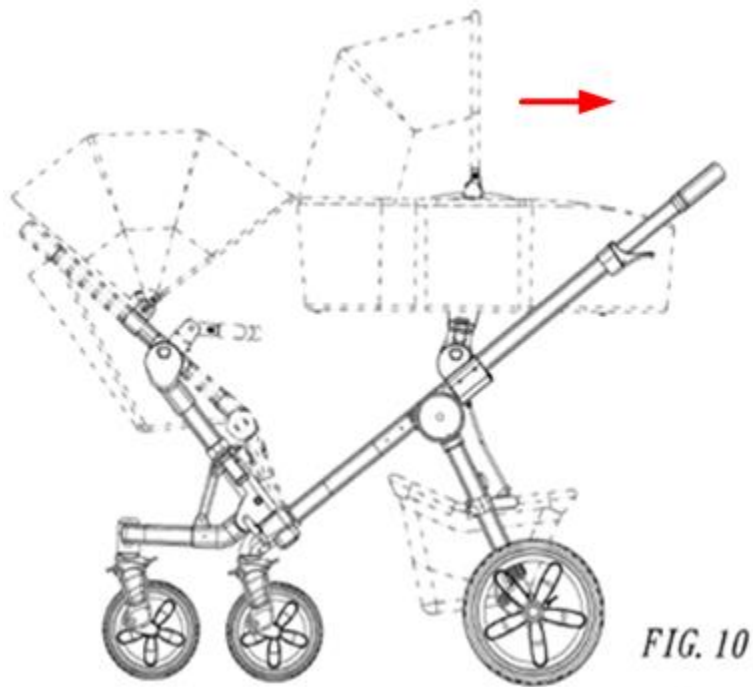


(EX1048, FIGS. 1, 5, 10-11.)

H. Claim 10

Liao discloses a first seat (the rear seat) releasably connected in a backwards position. (EX1048, FIG. 10; EX1001 at ¶ 195.) The first seat is releasably connected because it may be replaced with a different seat or removed. (EX1048, FIG. 10; EX1001 at ¶ 195.)

Accordingly, Liao discloses the additional limitations of claim 10. (EX1001 at ¶ 196.)



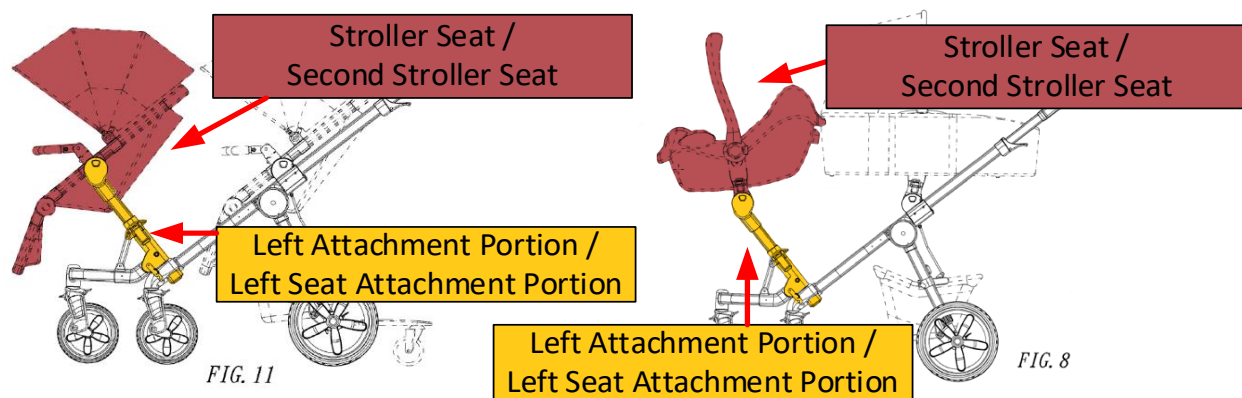
(EX1048, FIG. 10.)

I. Claim 11

Liao discloses that the second stroller seat (the front seat) is one of a stroller seat, car seat, or bassinet. (EX1001 at ¶ 197.) 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; EX1001 at ¶ 197.)

Accordingly, Liao discloses the additional limitations of claim 11. (EX1001 at ¶ 198.)



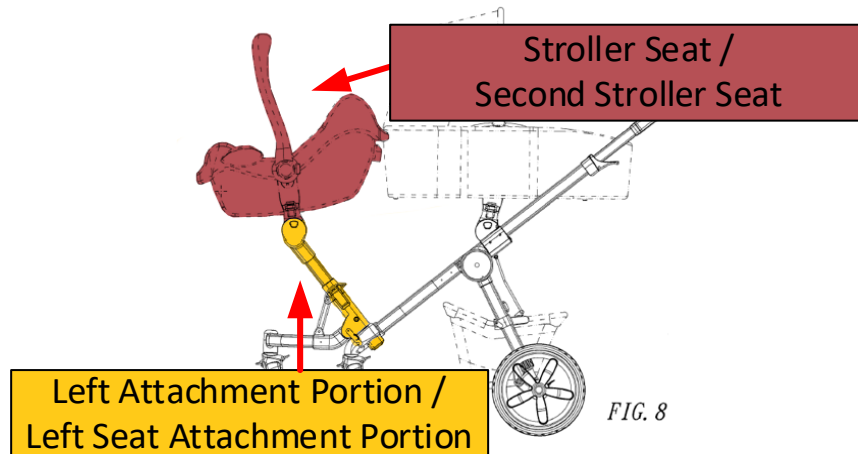
(EX1048, FIGS. 8, 11.)

J. Claim 12

Liao discloses wherein the second seat (the front seat) is a bassinet or a car seat. (EX1001 at ¶ 199.) In particular, FIG. 8 shows a car seat coupled to the seat attachment portions in the front seat position. (EX1048, FIG. 8; EX1001 at ¶ 199.) Liao's Specification states that FIG. 8 shows a car seat, pram body, and basket attached to the stroller. (EX1066, 34-35; EX1001 at ¶ 199.)

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

(EX1001 at ¶ 200.)



(EX1048, FIG. 8.)

K. Claim 13

Liao discloses a frame with two folding mechanisms, as seen in FIG. 1.

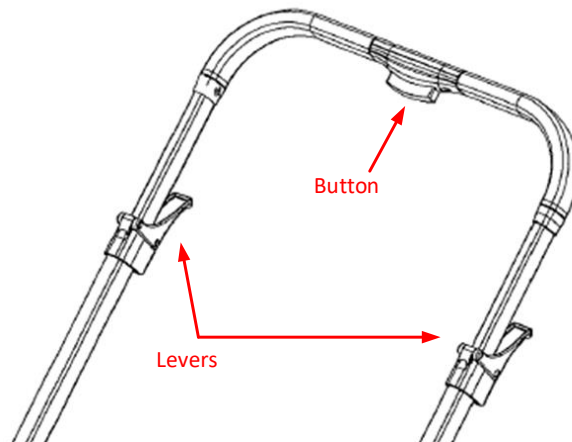
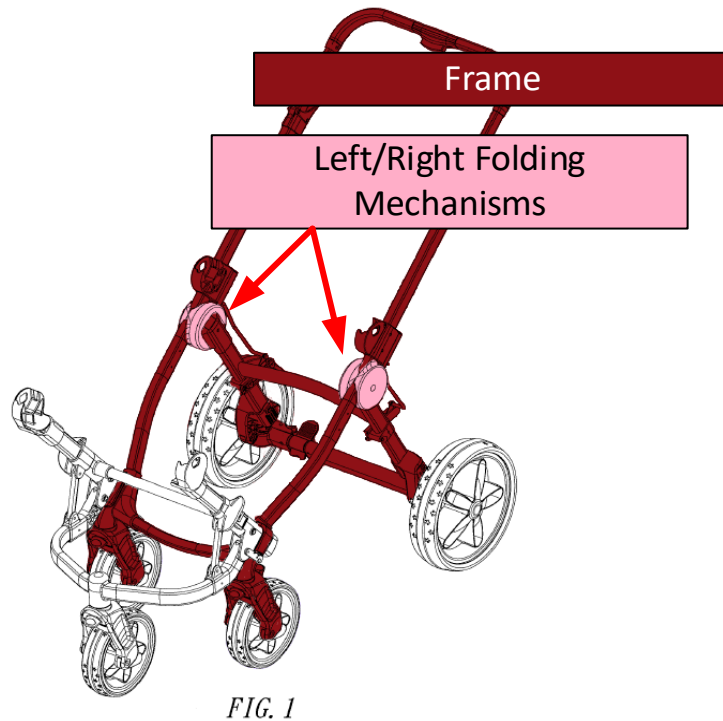
(EX1048, FIG. 1; EX1001 at ¶ 201.) A POSITA would have understood that the round hubs (pink) permit the stroller to fold, because they are round hubs that function as joints for folding the stroller. (EX1048, FIG. 1; EX1001 at ¶ 201.) A POSITA would have also recognized that the round hubs are hinge points for collapsible strollers. (EX1048, FIG. 1; EX1001 at ¶ 201.) Therefore, Liao discloses two folding mechanisms. (EX1001 at ¶ 201.)

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. (EX1048, FIG. 1; EX1001 at ¶ 202.)

Furthermore, Liao shows two control mechanisms on its handle, a button and levers. (EX1048, FIG. 1; EX1001 at ¶ 203.) One of these mechanisms (the levers) is for telescoping the handle. (EX1048, FIG. 1; EX1001 at ¶ 203.) 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. (EX1048, FIG. 1; EX1001 at ¶ 203)

The PTO has found that Liao “is adjustable between a folded configuration and an unfolded configuration.” (EX. 1068, ‘449 Patent File History, 950-53; EX1001 at ¶ 205.) Furthermore, the contemporaneous filing of Liao’s Taiwanese design patent confirms that the same FIG.FIGS. contained a circular articulation for folding the stroller. (EX1052, UPD; EX1001 at ¶ 204.)

Accordingly, Liao discloses the additional limitations of claim 13. (EX1001 at ¶ 206.)



(EX1048, FIG. 1.)

L. Claim 14

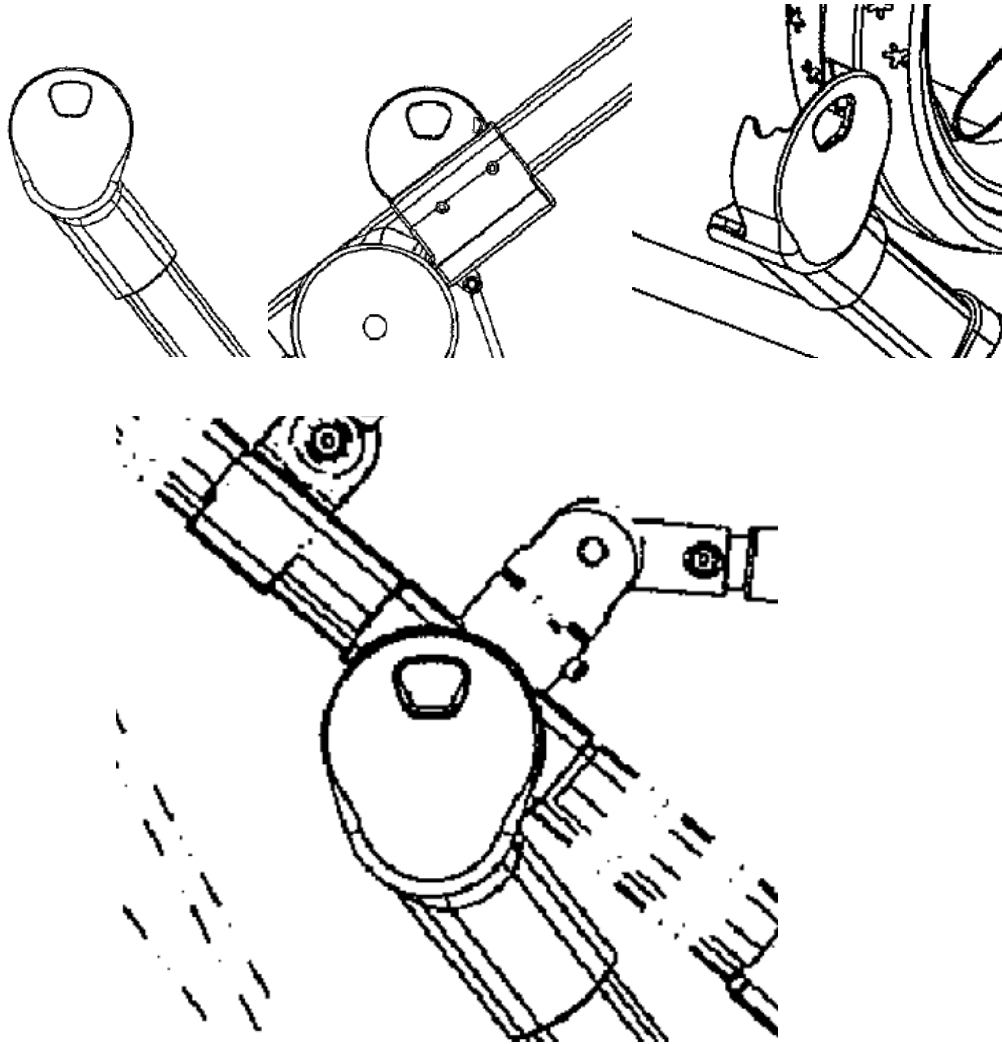
Liao's seat includes a releasable connection including a button or locking tab. (EX1048, FIG. 1; EX1001 at ¶ 207.) As shown in FIG. 5, both front and rear

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. (EX1048, FIG. 1, 5; EX1001 at ¶ 207.)

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. (EX1048, FIG. 9; EX1001 at ¶ 208.)

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. (EX1001 at ¶ 209.) A POSITA would have known that it was desirable to use a mechanism to prevent the seat from unintentionally coming free. (EX1001 at ¶ 209.) 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. (EX1001 at ¶ 209.)

Accordingly, Liao discloses or, alternatively, renders obvious the limitations of claim 14. (EX1001 at ¶ 210.)



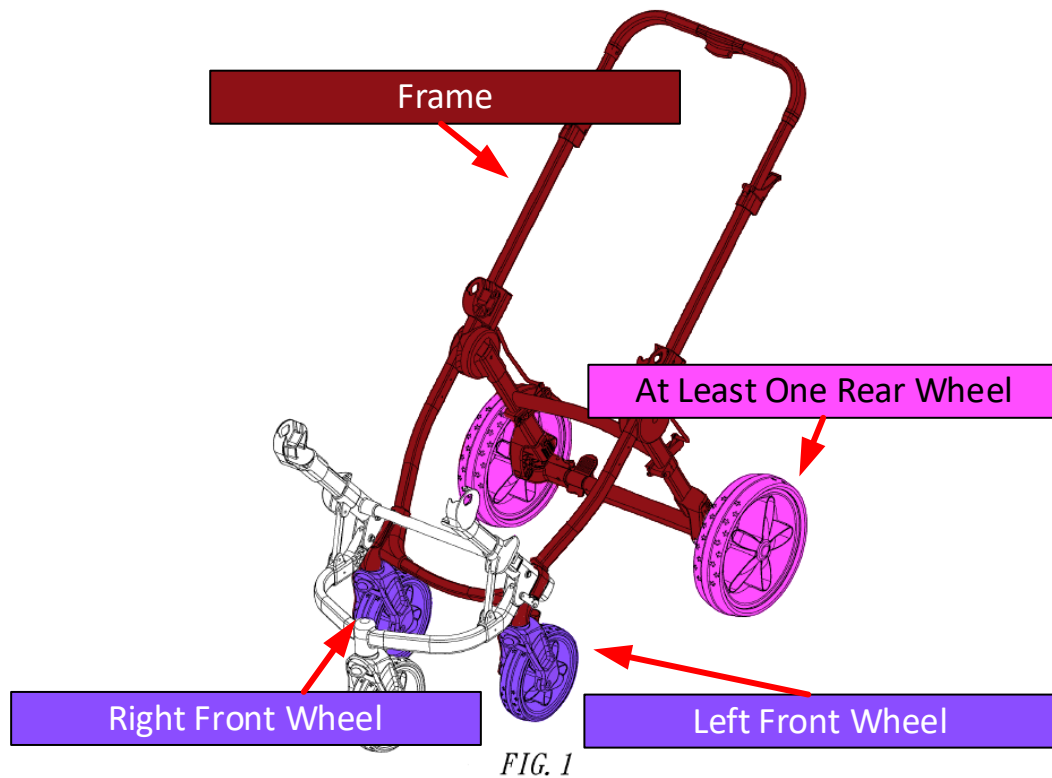
(EX1048, FIGS. 1, 5.)

M. Claim 15

Liao discloses a stroller with a pair of back wheels. (EX1001 at ¶ 211.)

FIG. 1 shows a pair of back wheels. (EX1048, FIG. 1; EX1001 at ¶ 211.)

Accordingly, Liao discloses the limitations of claim 15. (EX1001 at ¶ 212.)



(EX1048, FIG. 1.)

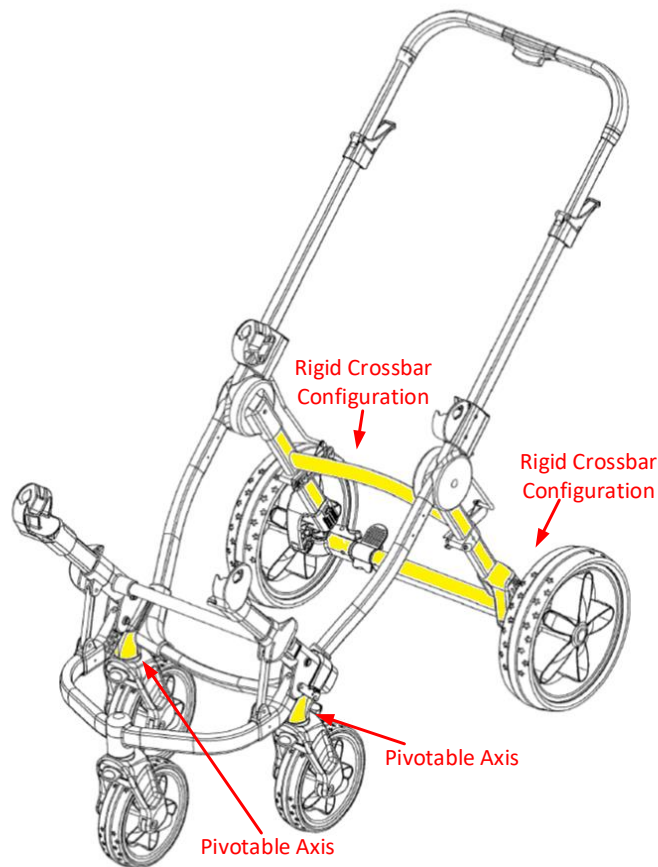
N. Claim 16

FIG. 1 shows a pivoting pair of front wheels on individual axes and a fixed pair of wheels in the back. (EX1048, FIG. 1; EX1001 at ¶ 213.) This would have been evident to a POSITA because each front wheel is connected to the frame via an individual swivel mechanism (EX1048, FIG. 1; EX1001 at ¶ 213.) POSITA would have recognized the swivel, as they were commonly used for pivoting stroller wheels to facilitate steering. (EX1048, FIG. 1; EX1001 at ¶ 213.)

Secondly, the rear wheels are shown connected to the frame by a series of crossbars and vertical rear-wheel frame elements (in yellow). (EX1048, FIG. 1;

EX1001 at ¶ 214.) A POSITA would have known that this rectangular configuration would not be capable of pivoting and that the rear wheels are fixed. (EX1048, FIG. 1; EX1001 at ¶ 214)

Accordingly, discloses the limitations of claim 16. (EX1001 at ¶ 215.)



(EX1048, FIG. 1.)

O. Claim 17

Liao discloses a right side attachment frame member and a left side attachment frame member, as shown in FIG. 1. (EX1048, FIG. 1; EX1001 at ¶ 216.)

Accordingly, Liao discloses the limitations of claim 17. (EX1001 at ¶ 217.)

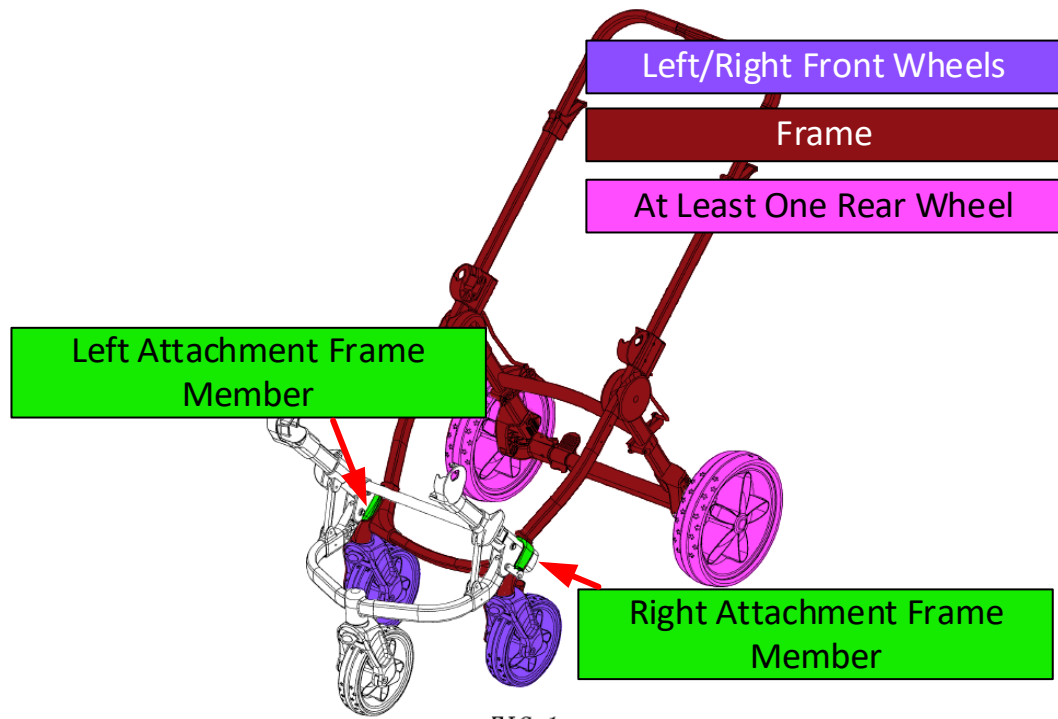


FIG. 1

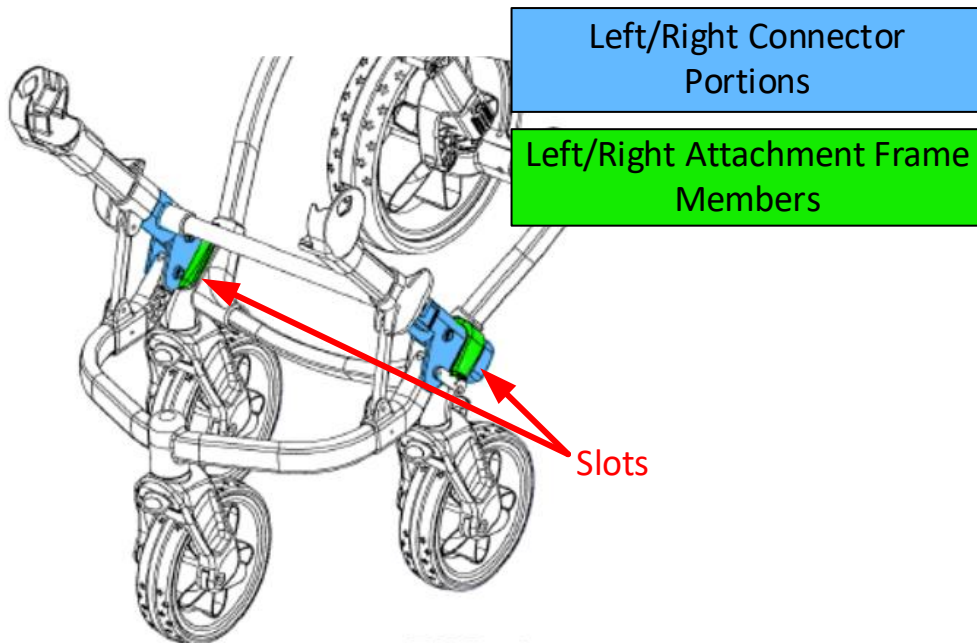


FIG. 1

(EX1048, FIG. 1.)

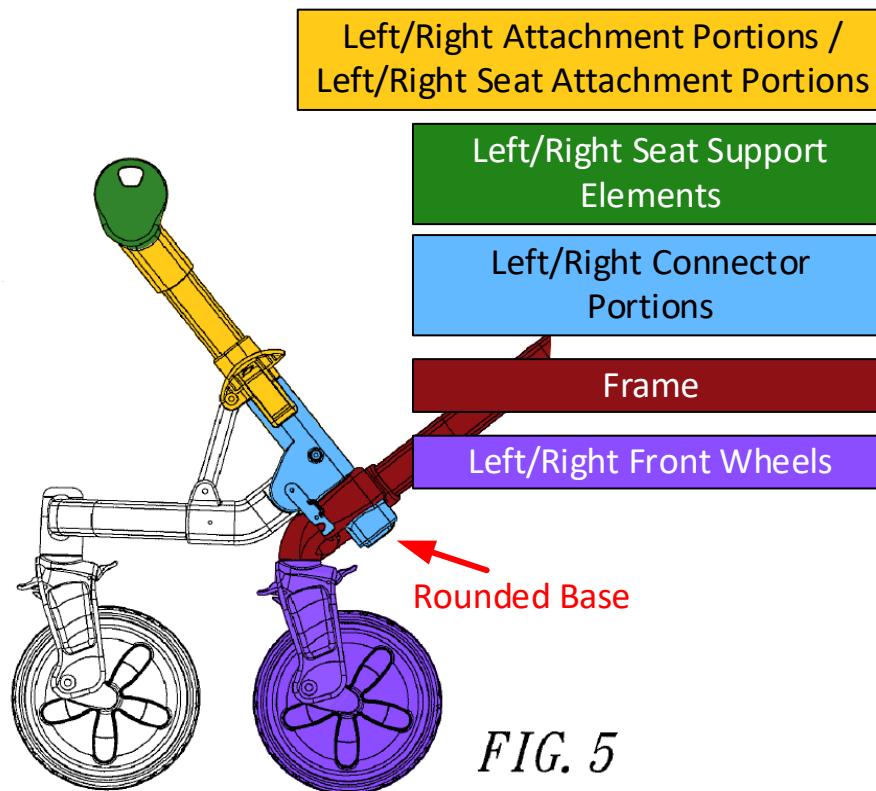
P. Claims 18-22

The base of the connector portion is rounded, as shown in FIG. 1. (EX1048, FIG. 1; EX1001 at ¶ 218.) The slot is rounded and wraps around the connector portion. (EX1048, FIG. 1; EX1001 at ¶ 218.) The connector of Liao is generally cylindrical as a result of the beveling of the surface visible in FIG. 1. (EX1048, FIG. 1; EX1001 at ¶ 218.) Because the connector portion of Liao is cylindrical, POSITA would have known that the slot of the attachment frame member is also cylindrical. (EX1048, FIG. 1; EX1001 at ¶ 218.) POSITA would have known that the connector portion is also tubular. (EX1048, FIG. 1; EX1001 at ¶ 218.) 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; EX1001 at ¶ 218.)

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. (EX1048, FIG. 1; EX1001 at ¶ 219.)

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. (EX1001 at ¶ 220.)

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. (EX1001 at ¶ 220.) 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. (EX1001 at ¶ 220.)



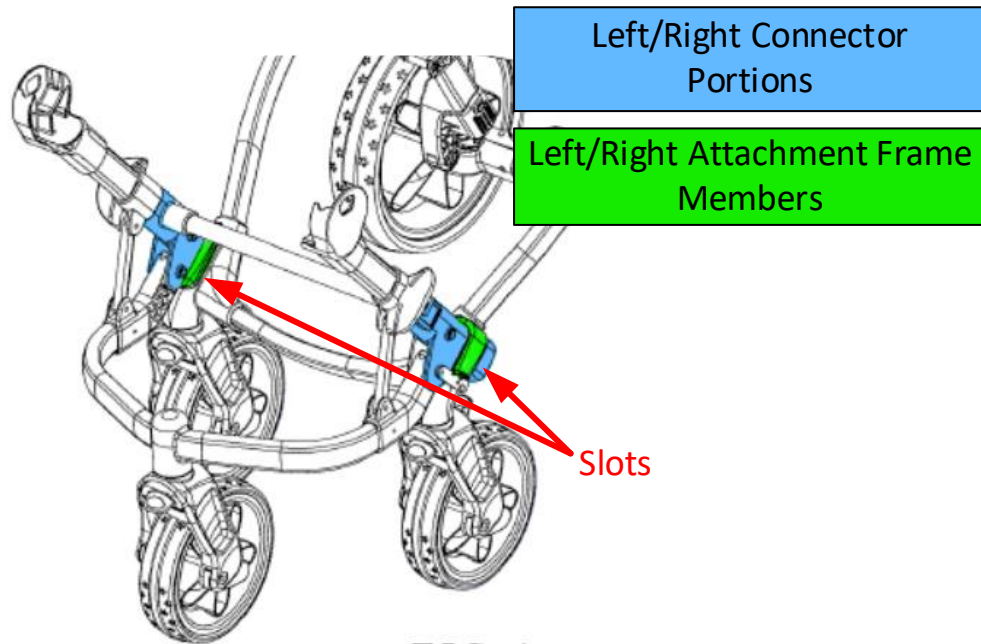


FIG. 1

(EX1048, FIG. 1, 5.)

Q. Claim 23

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; EX1001 at ¶ 221.) As a result, the shape of the connector portion is necessarily complementary and cooperating with the shape of the attachment frame member. (EX1048, FIG. 1; EX1001 at ¶ 221.)

Accordingly, Liao discloses the limitations of claim 23. (EX1001 at ¶ 222.)

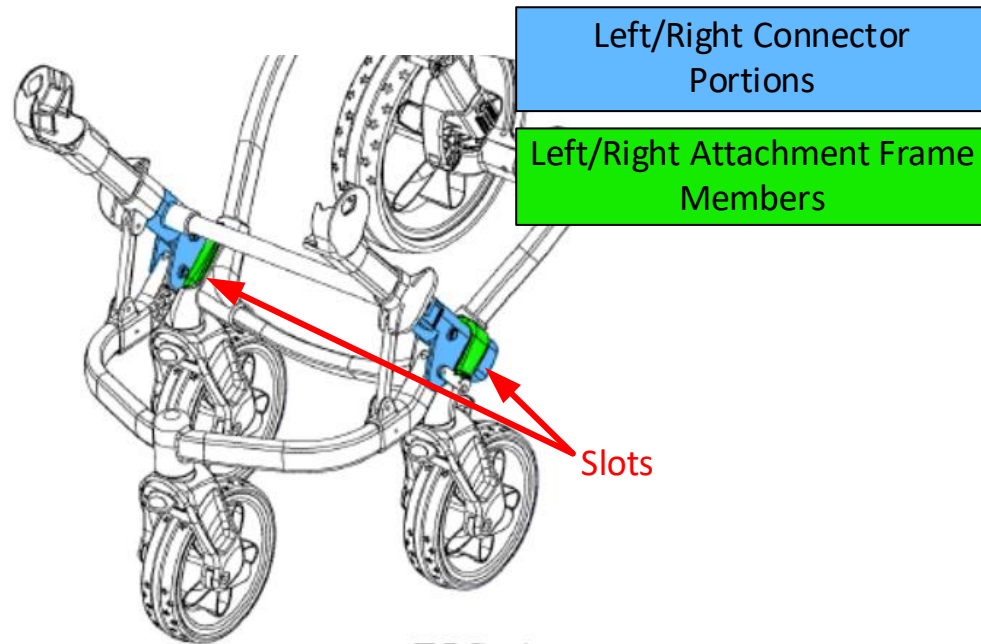


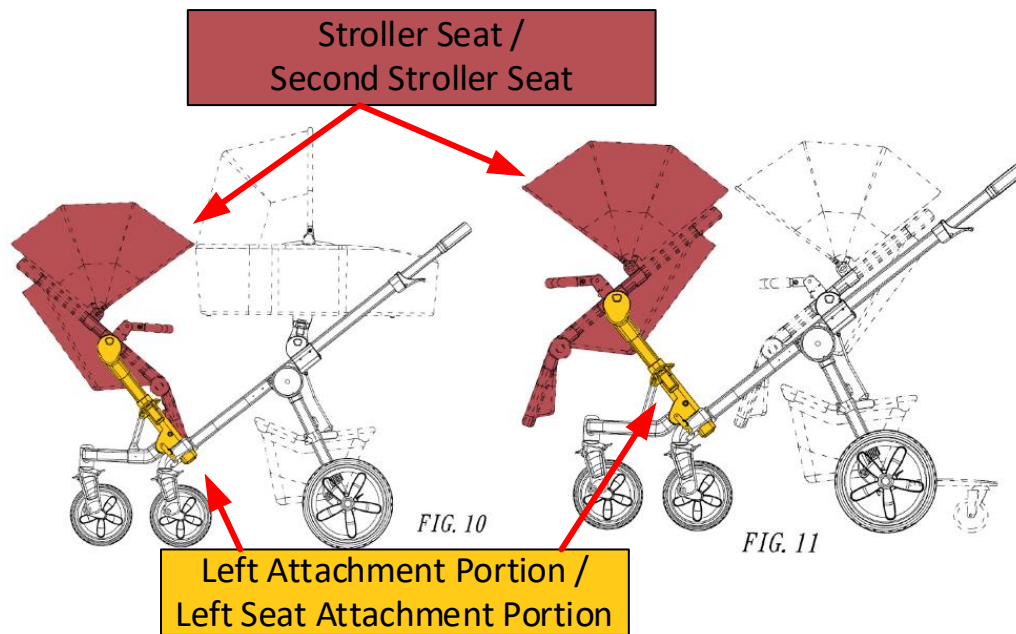
FIG. 1

(EX1048, FIG. 1.)

R. Claim 29

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; EX1001 at ¶ 224.)

Accordingly, Liao discloses the limitations of claim 29. (EX1001 at ¶ 226.)

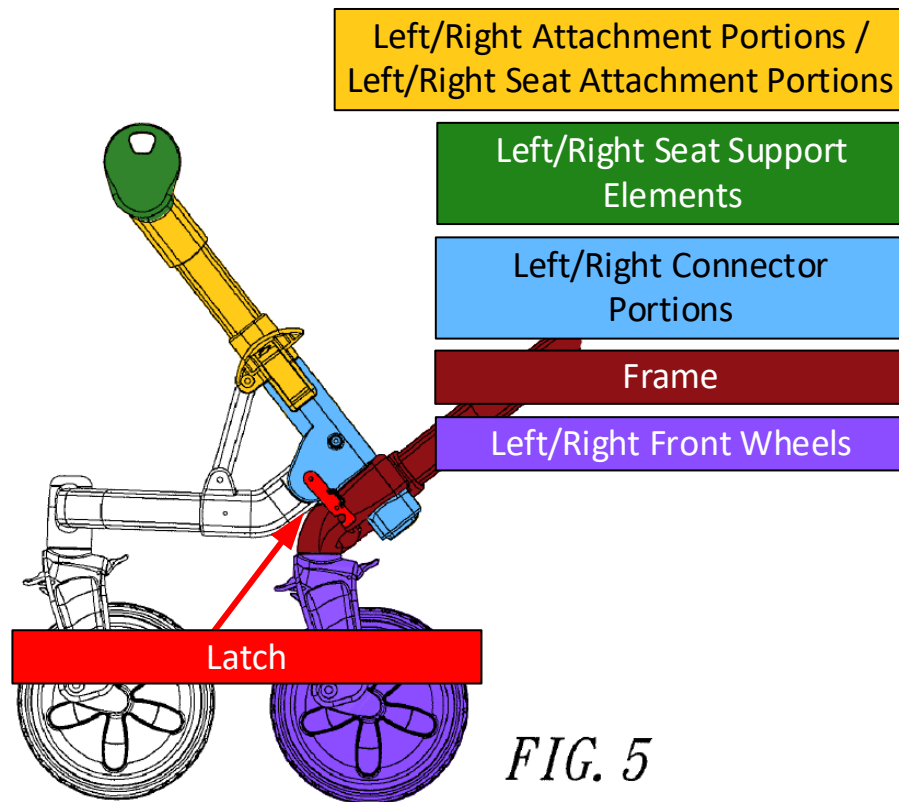


(EX1048, FIGS. 8, 10.)

S. Claim 30

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. (EX1048, FIGS. 1, 5; EX1001 at ¶ 227.) Such a latch is a snap at least in that it snaps on to the protrusion. (EX1048, FIGS. 1, 5; EX1001 at ¶ 227.) Furthermore, such a latch is held in place by friction by virtue of it snapping around the protrusion, and thus is a friction fit. (EX1048, FIGS. 1, 5; EX1001 at ¶ 227.) 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). (EX1048, FIGS. 1, 5; EX1001 at ¶ 227.)

Accordingly, Liao the limitations of claim 30. (EX1001 at ¶ 228.)



(EX1048, FIG. 5.)

VIII. GROUND 2 – LIAO IN VIEW OF CHEN

Claims 1-30 were obvious in view of Liao, as explained with respect to Ground 1. (*Supra*, §§ VII.) However, if the PO 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

As discussed *supra* § VII(A)(a)-(d), Liao discloses a seat attachment for a stroller comprising separate left and right attachment portions with seat support elements. (EX1001 at ¶ 229.) Chen discloses receptacles (32, 33) for a stroller into which inserts (41, 51) for seats can be removably inserted. (EX1065, ¶¶ 5-8, 24; EX1001 at ¶ 229.) The inserts and receptacles permit the seat to face forward or backward. (EX1065, ¶¶ 5-8, ¶¶ 24, 26, FIGS. 5 & 11; EX1001 at ¶ 229.)

To the extent that PO 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; EX1001 at ¶ 230.) 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. (EX1065, ¶¶ 5-6; EX1001 at ¶ 230.)

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. (EX1001 at ¶ 231.)

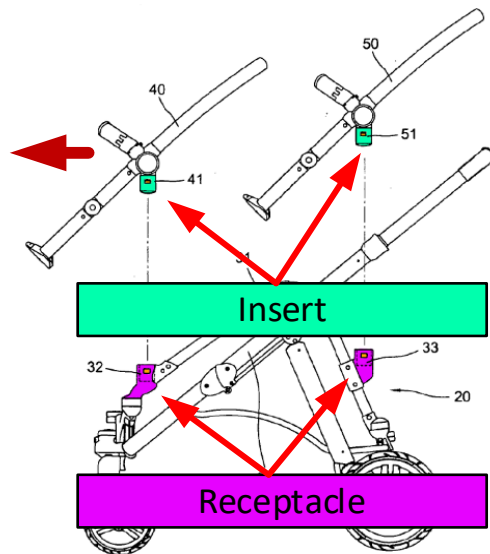


FIG. 5

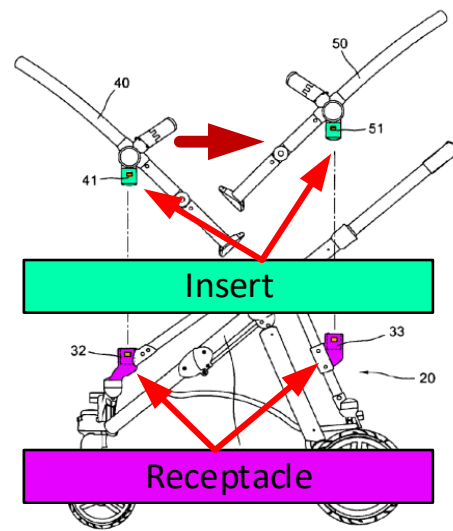


FIG. 11

(EX1065, FIGS. 5, 11.)

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* § VII(A). (EX1001 at ¶ 232.)⁴

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; EX1001 at para 233.)

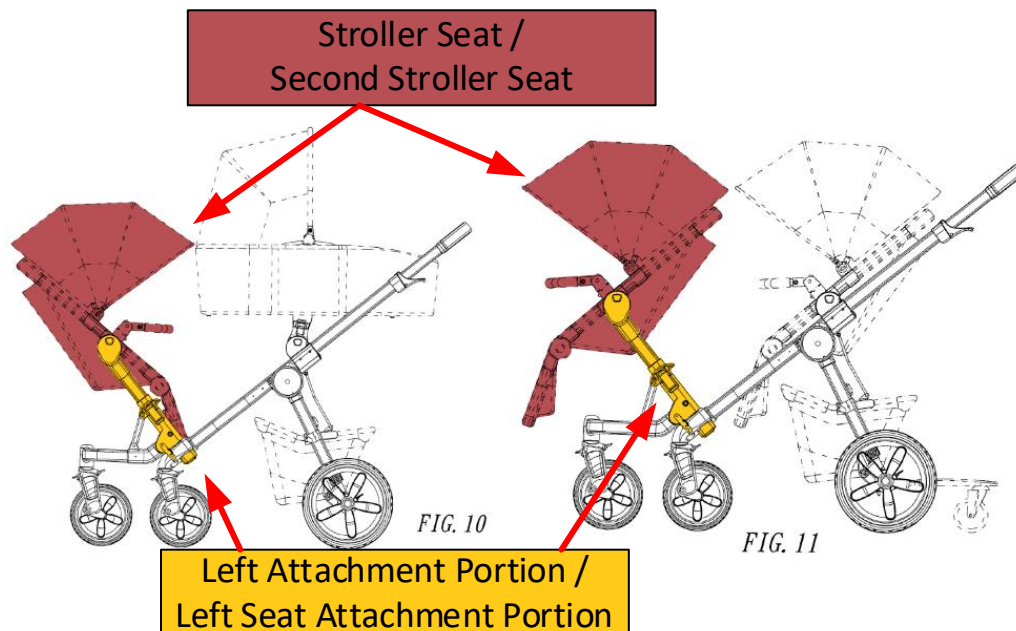
Accordingly, it would have been obvious to POSITA that Liao in view of Chen discloses the elements of claims 1 and 24. (EX1001 at ¶ 234.)

B. Claims 2 & 25

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* § VII(B). (EX1001 at ¶ 235.)

⁴ If Liao already discloses or renders obvious given subject matter, then the combination of Liao with Chen must also disclose that subject matter.

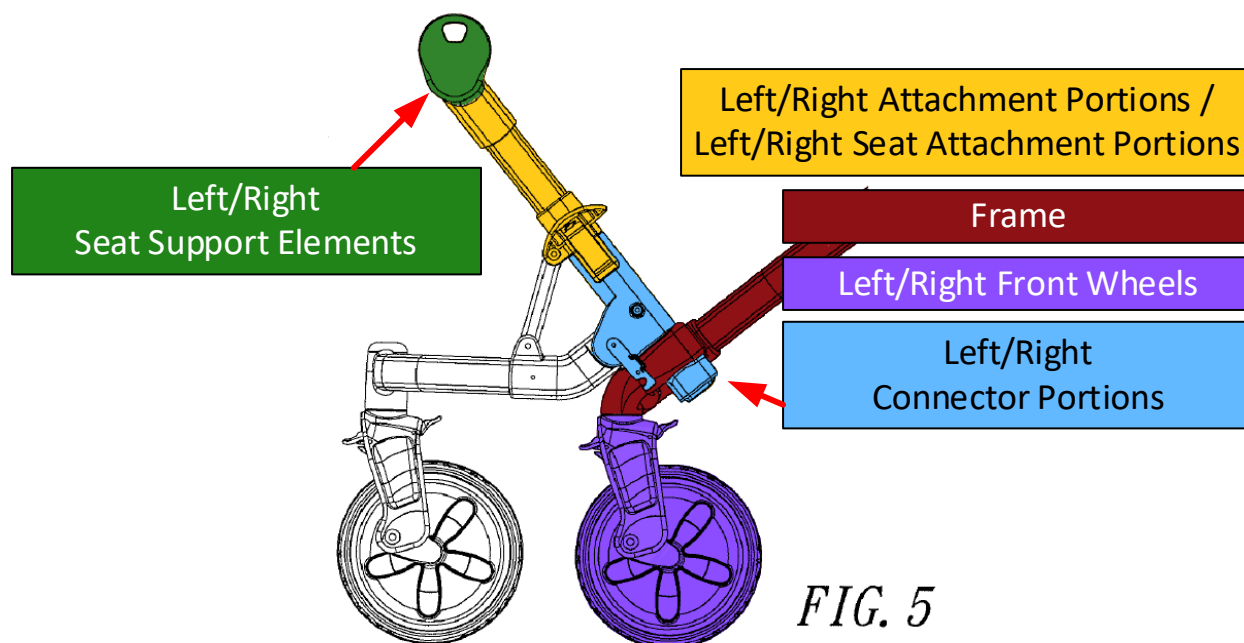
To the extent PO argues that Liao alone does not disclose the elements of claims 2 and 25, Chen also discloses that the seats are stroller seats. (EX1065, Chen, ¶¶ 5- 8, 24, 26; EX1001 at ¶ 236.) It would have been obvious to POSITA to use stroller seats in a stroller since stroller seats permit an infant to be carried by the stroller and are a standard feature of prior art strollers. (EX1065, Chen, ¶¶ 5- 8, 24, 26; EX1001 at ¶ 236



(EX1048, FIG. 10, 11.)

C. Claims 3-5 & 26-28

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* § VII(C). (EX1001 at ¶ 237.)



(EX1048, FIG. 5.)

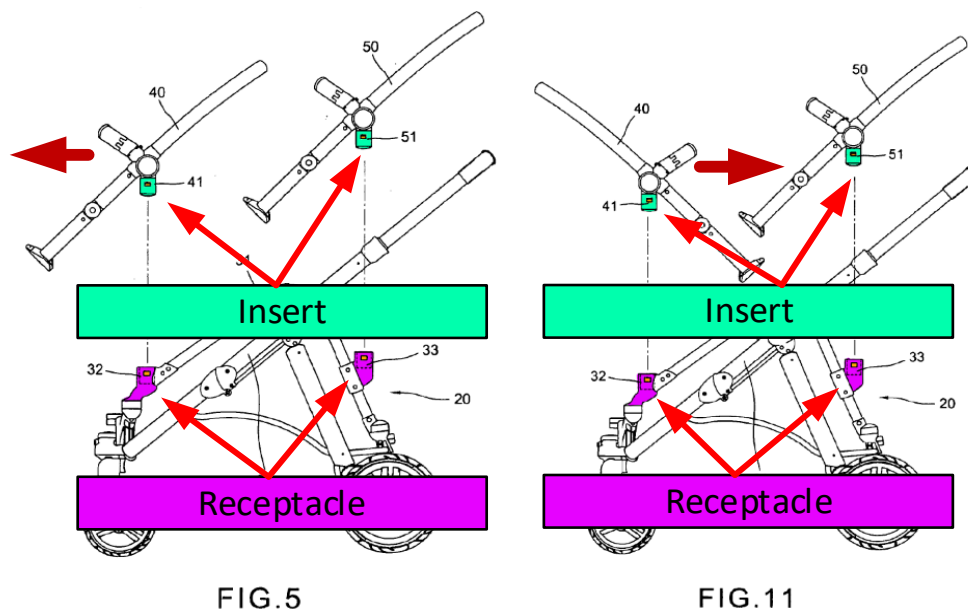
E. Independent Claim 9

As discussed supra § VII, Liao discloses a stroller and a seat attachment for a stroller comprising separate left and right attachment portions with seat support elements. (EX1001 at ¶ 238.) Chen discloses receptacles (32, 33) for a stroller into which inserts (41, 51) for seats can be removably inserted. (EX1065, ¶¶ 5-8, 24; EX1001 at ¶ 238.) The inserts and receptacles permit the seat to face forward or backward. (EX1065, ¶¶ 5-8, ¶¶ 24, 26, FIGS. 5 & 11; EX1001 at ¶ 238.)

To the extent that PO 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; EX1001 at ¶ 239.) 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. (EX1065 ¶¶ 5-6; EX1001 at ¶ 239.)

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. (EX1001 at ¶ 240.)



(EX1065, FIGS. 5, 11.)

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* § VII(G). (EX1001 at ¶ 241.)

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; EX1001 at ¶ 242.)

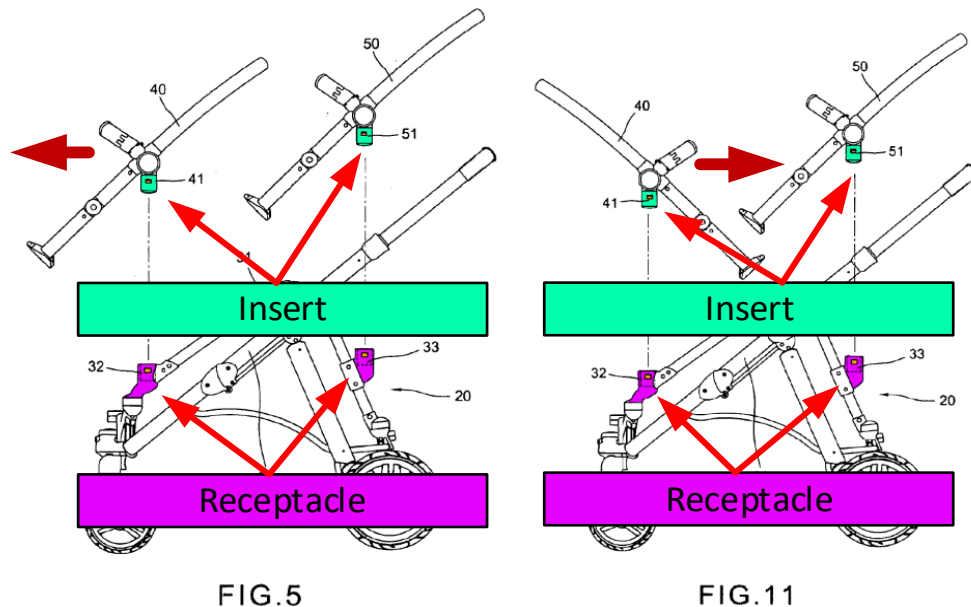
Accordingly, it would have been obvious to POSITA that Liao in view of Chen discloses the elements of claim 9. (EX1001 at ¶ 243.)

F. Claim 10

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* § VII(H). (EX1001 at ¶ 244.)

Furthermore, as discussed *supra* § VIII(E), Chen discloses means for reversibly and removably coupling a seat to a stroller. (EX1001 at ¶ 245) This functionality was integrated into Stopp in the discussion of claim 9, *supra* § VIII(E), and it would be obvious to POSITA to use the available functionality as intended. (EX1001 at ¶ 245.)

Accordingly, it would have been obvious to POSITA that Liao in view of Chen discloses the elements of claim 10. (EX1001 at ¶ 246.)



(EX1065, FIGS. 5, 11.)

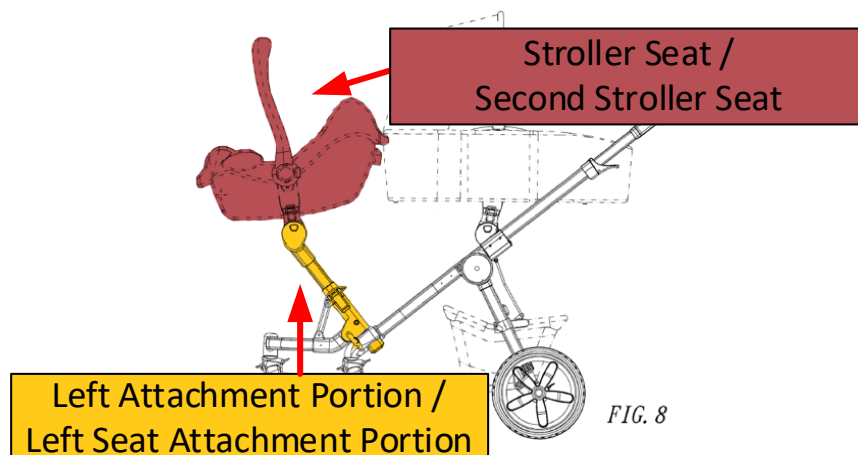
G. Claim 11

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* § VII(I). (EX1001 at ¶ 247.)

Chen also discloses the second seat is a stroller seat. (EX1065 ¶¶ 2-9, 21-26; EX1001 at ¶ 248.) It would have been obvious to POSITA to use a stroller seat as a seat for a stroller. (EX1065 ¶¶ 2-9, 21-26; EX1001 at ¶ 248.)

H. Claim 12

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* § VII(J). (EX1001 at ¶ 249.)



(EX1048, FIG. 8.)

I. Claim 13

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* § VII(K). (EX1001 at ¶ 251.)

J. Claim 14

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* § VII(L). (EX1001 at ¶ 252.)

K. Claim 15

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* § VII(M). (EX1001 at ¶ 253.)

L. Claim 16

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* § VII(N). (EX1001 at ¶ 254.)

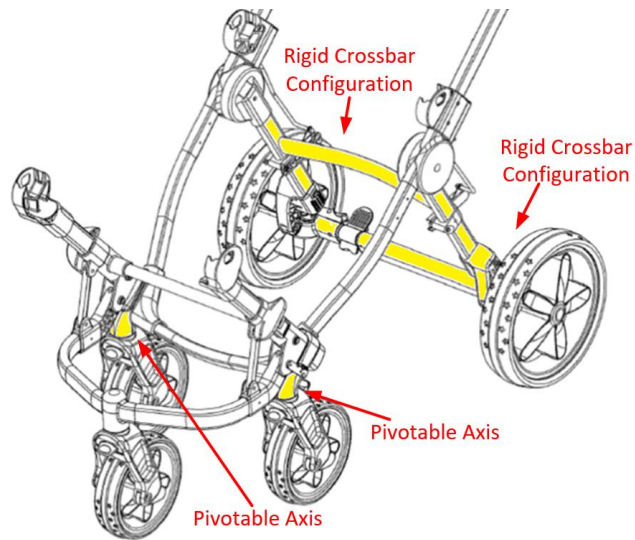
Chen also discloses, as shown in FIG. 6, front wheels on individual pivoting axes and the rear wheels on a rigid, rectangular frame. (EX1065, FIG. 6; EX1001 at ¶ 255.) POSITA would therefore have understood, from visual inspection of

Chen's FIG.FIGS., that Chen discloses front wheels that pivot and back wheels that are fixed. (EX1065, FIG. 6; EX1001 at ¶ 255)

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. (EX1001 at ¶ 256.)

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. (EX1001 at ¶ 257.) 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. (EX1001 at ¶ 257.) 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. (EX1001 at ¶ 257)

Accordingly, it would have been obvious to POSITA that Liao in view of Chen discloses the elements of claim 16. (EX1001 at ¶ 258.)



(EX1048, FIG. 1.)

M. Claim 17

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* § VII(O). (EX1001 at ¶ 259.)

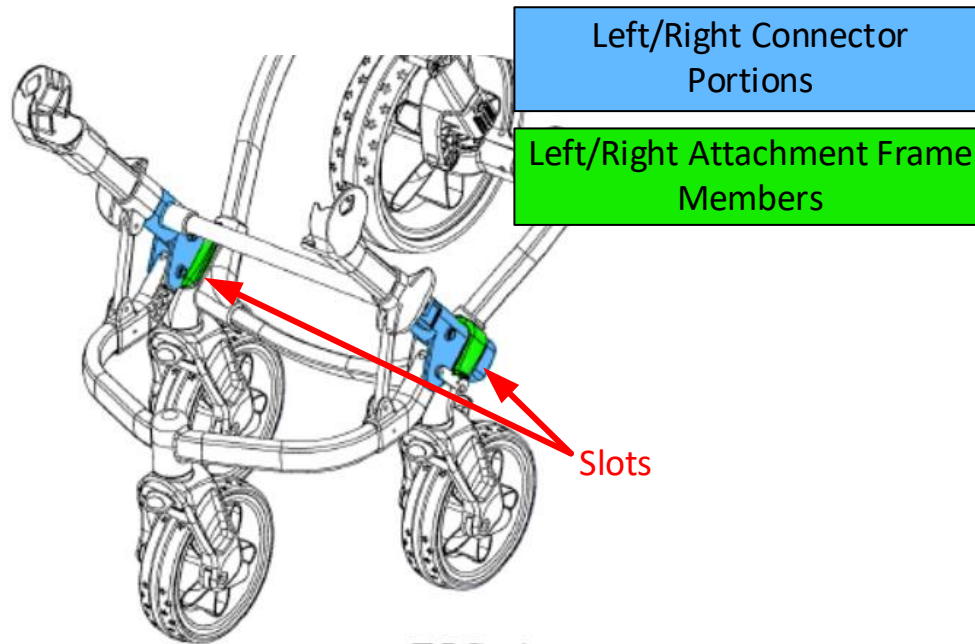


FIG. 1

(EX1048, FIG. 1.)

N. Claims 18-23

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* § VII(P)-(Q) (EX1001 at ¶ 260.)

To the extent that PO argues that Liao does not disclose the elements of claims 18-22, 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; EX1001 at ¶ 261.) It would have been obvious to POSITA to use Chen's forward-backward facing capabilities

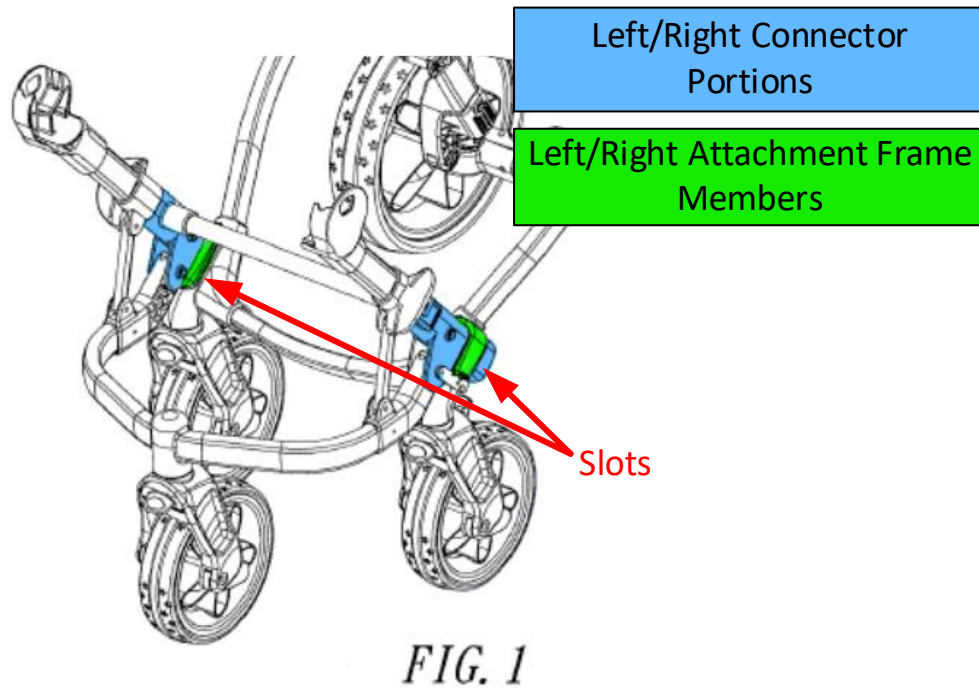
which are based on the inserts and receptacles and which were incorporated into Liao as discussed with respect to claim 9, *supra* § VIII(E). (EX1001 at ¶ 261.)

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. (EX1001 at ¶ 262.)

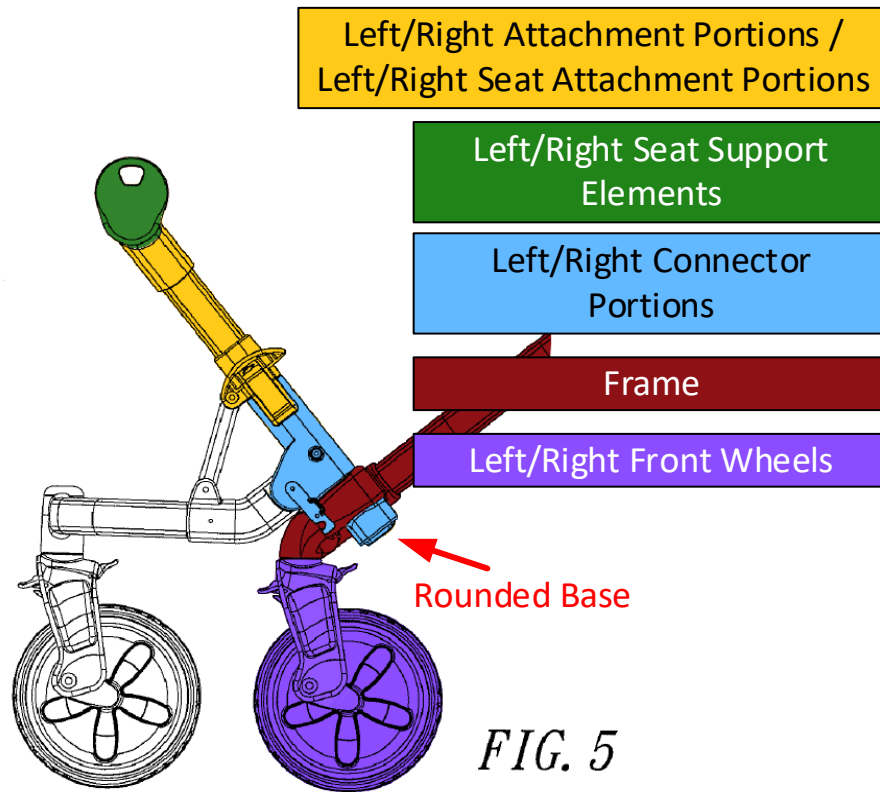
Furthermore, to the extent Liao in view of Chen does not explicitly disclose any of these elements, POSITA would have been aware that cylindrical, circular, and tubular constructions, cross-sections, and slots, were typical, old, and well-known in the art long before the effective filing date of the '869 Patent. (EX1001 at ¶ 263.) 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. (EX1001 at ¶ 263.) POSITA would have a reasonable expectation of 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. (EX1001 at ¶ 263.)

Accordingly, it would have been obvious to POSITA that Liao in view of Chen discloses the elements of claims 18-23. (EX1001 at ¶ 264.)



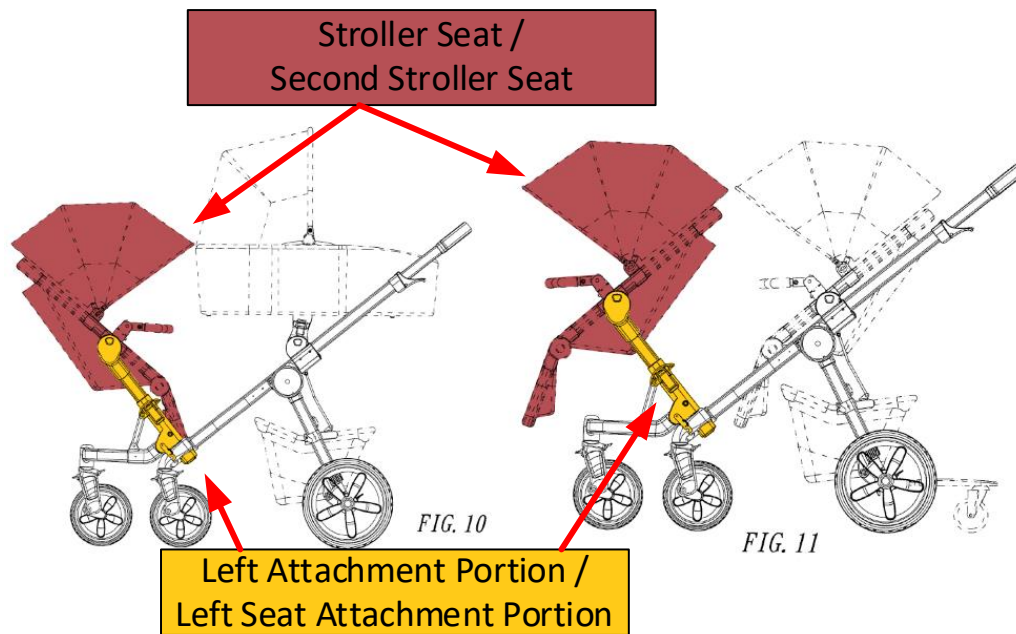
(EX1048, FIG. 1.)



(EX1048, FIG. 5.)

O. Claim 29

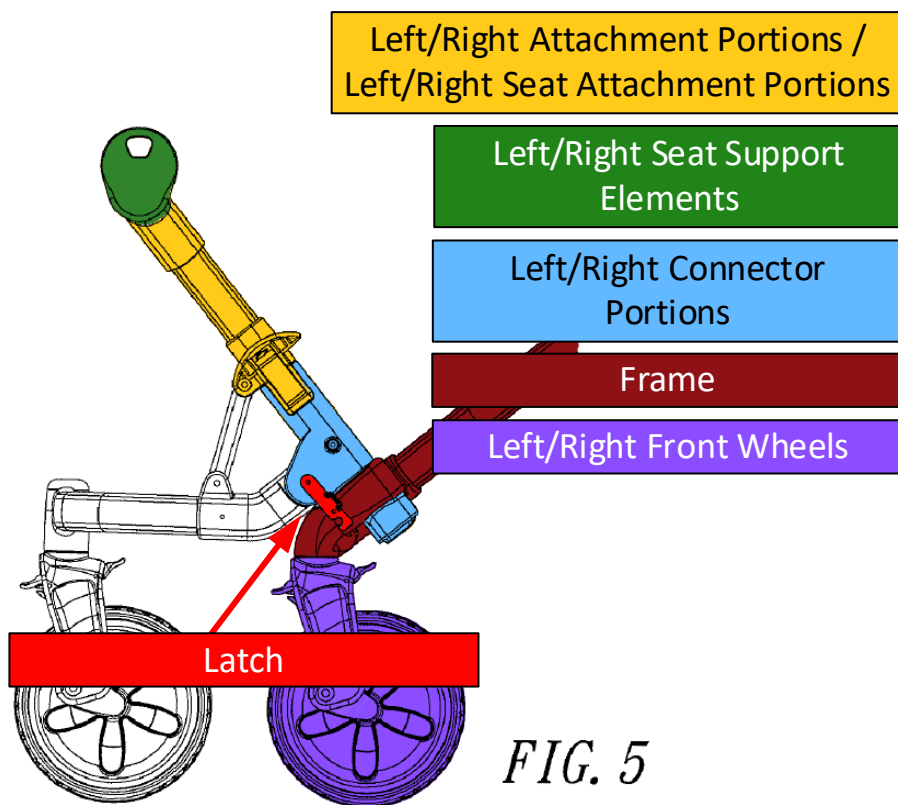
Liao in view of Chen discloses or renders obvious the elements of claim 29 for the same reasons that Liao disclosed or rendered obvious claim 29, as discussed *supra* § VII(R). (EX1001 at ¶ 265.)



(EX1048, FIGS. 10, 11.)

P. Claim 30

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* § VII(S). (EX1001 at ¶ 267.)



(EX1048, FIG. 5.)

IX. GROUND 3 — STOPP

Stopp renders obvious claims 1-30.

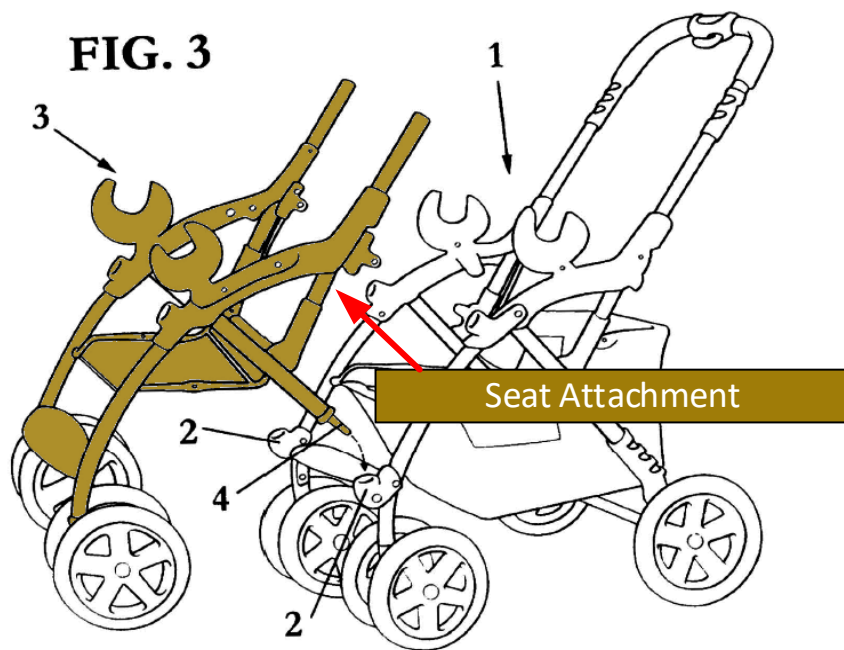
A. Independent Claims 1 & 24

a) [1(Pre)]/[24(Pre)]

Stopp discloses a seat attachment for a stroller. (EX1063, col. 2:1-34; EX1001 at ¶ 269.). This functionality is shown in FIGS. 3 and 4 of Stopp. (EX1063, FIGS. 3, 4; EX1001 at ¶ 269)

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. (EX1063, col. 2:1-20; EX1001 at ¶ 270.)

Accordingly, Stopp discloses limitations [1(Pre)]/[24(Pre)]. (EX1001 at ¶ 271.)



(EX1063, FIG. 3.)

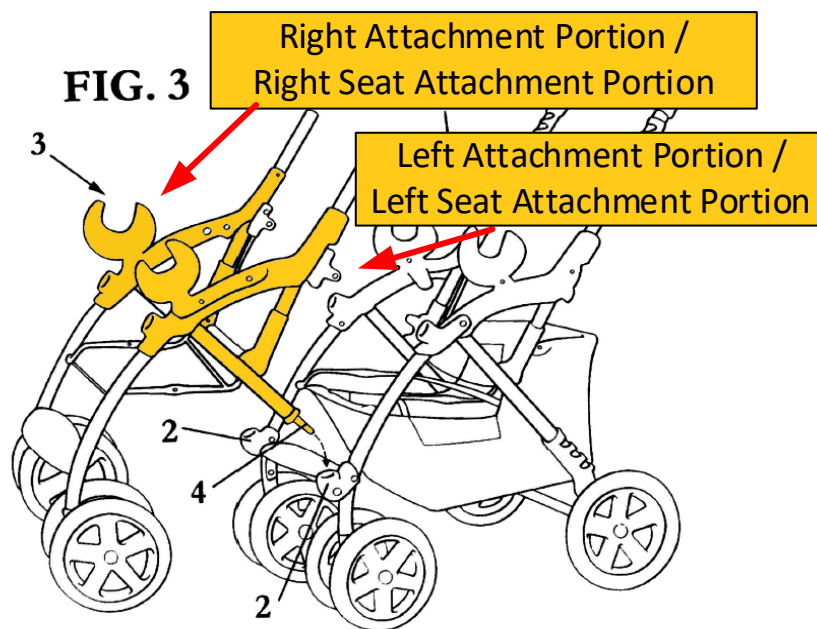
b) [1(a)]/[24(a)]

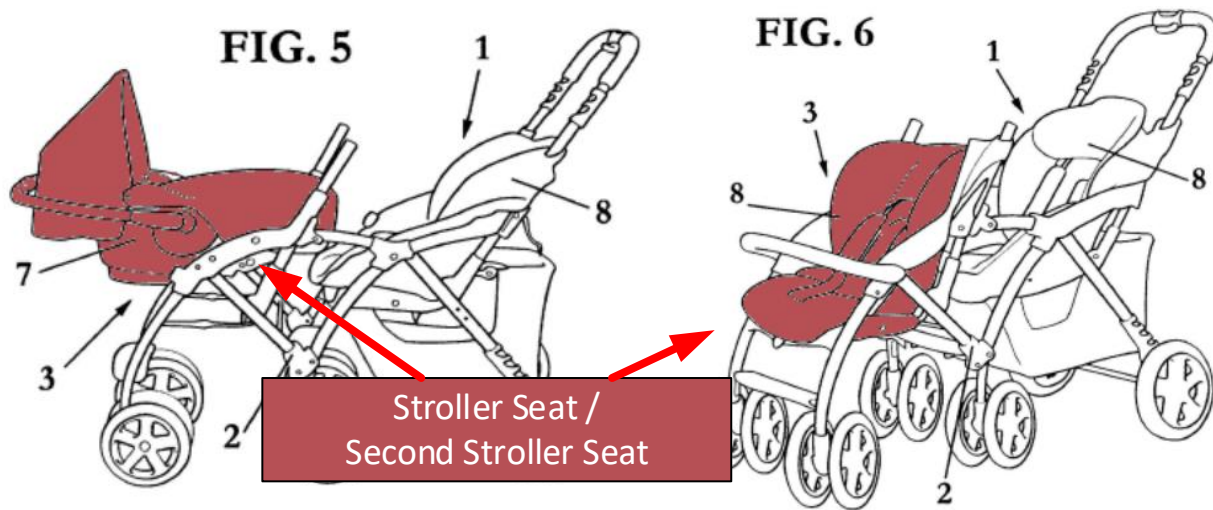
As shown in FIG.FIGS. 2 and 3, Stopp's seat attachment discloses left and right attachment portions and the left attachment portion is separate from the right attachment portion, as shown below. (EX1001 at ¶ 272.) The left attachment also includes one rod of the pair of rods (4) of the seat attachment (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; EX1001 at ¶ 272.). An identical right-side attachment portion is present as well, due to Stopp's frame symmetry.

(EX1063, col. 2:1-31, FIGS. 5, 6; EX1001 at ¶ 272)

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)]. (EX1063, col. 2:1-31, FIGS. 5, 6; EX1001 at ¶ 273).

Accordingly, Stopp discloses [1(a)]/[24(a)]. (EX1001 at ¶ 274.)





(EX1063, FIGS. 3, 5, 6.)

c) [1(b)]/[24(b)]

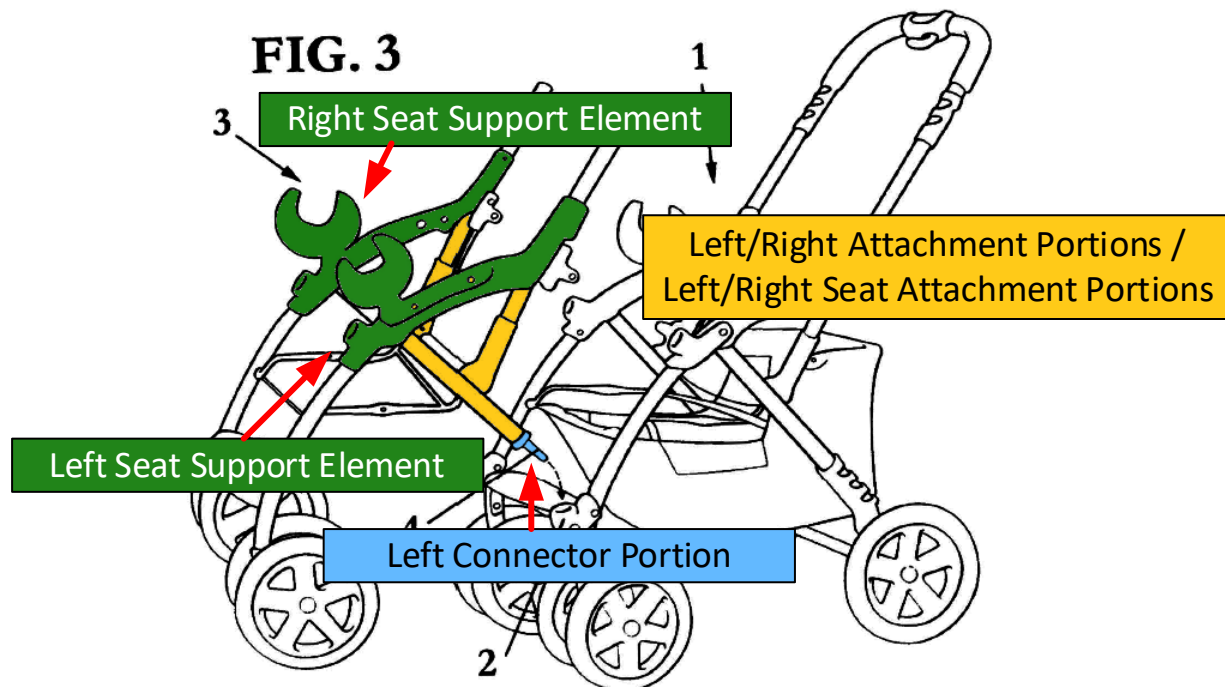
Each (seat) attachment portion of Stopp’s seat attachment discloses and includes a connector portion, labeled below, that removably connects to a stroller frame adjacent a left front wheel, and a left seat support element (also labeled below) that removably connects a seat in either a forward or backward position, as shown below in FIG.FIGS. 2, 3, 5, and 6. (EX. 1063, col. 2:1-34, FIGS. 2-5, 6; EX1001 at ¶ 275.) 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. (EX. 1063, col. 2:1-34, FIGS. 2-5, 6; EX1001 at ¶ 275.) The left seat support element is the top “crab-claw” feature illustrated in FIG.FIGS. 2 and 3 in conjunction with the associated “arm” part (which is capable of supporting a seat,

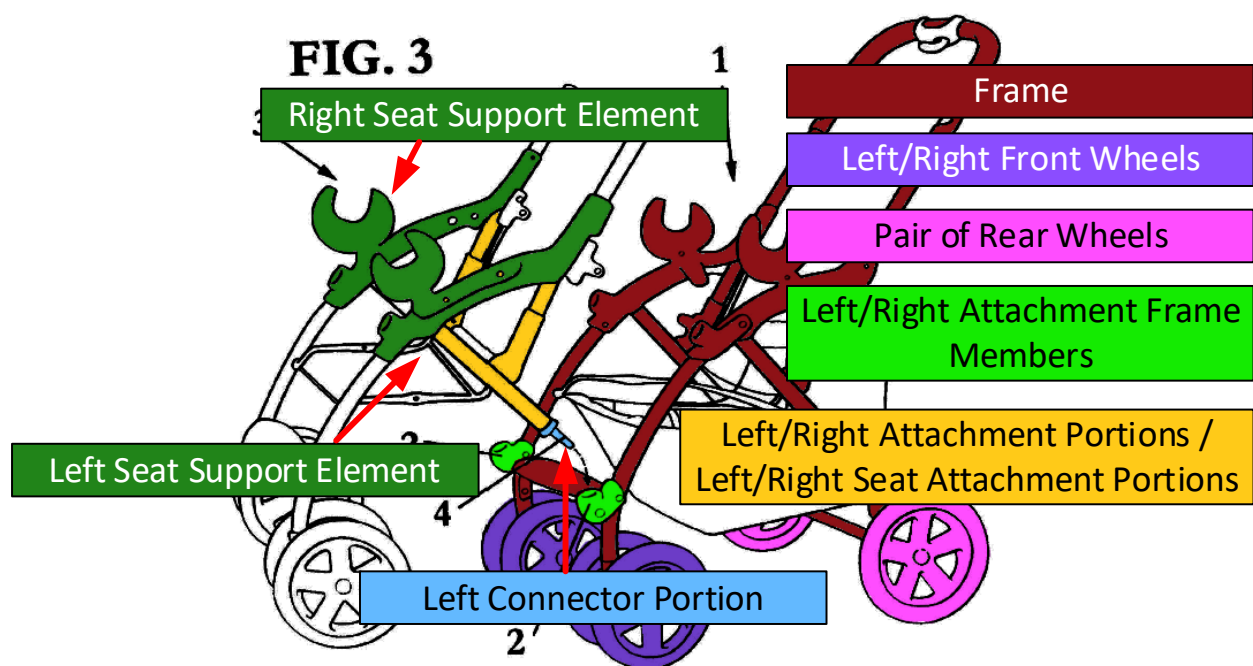
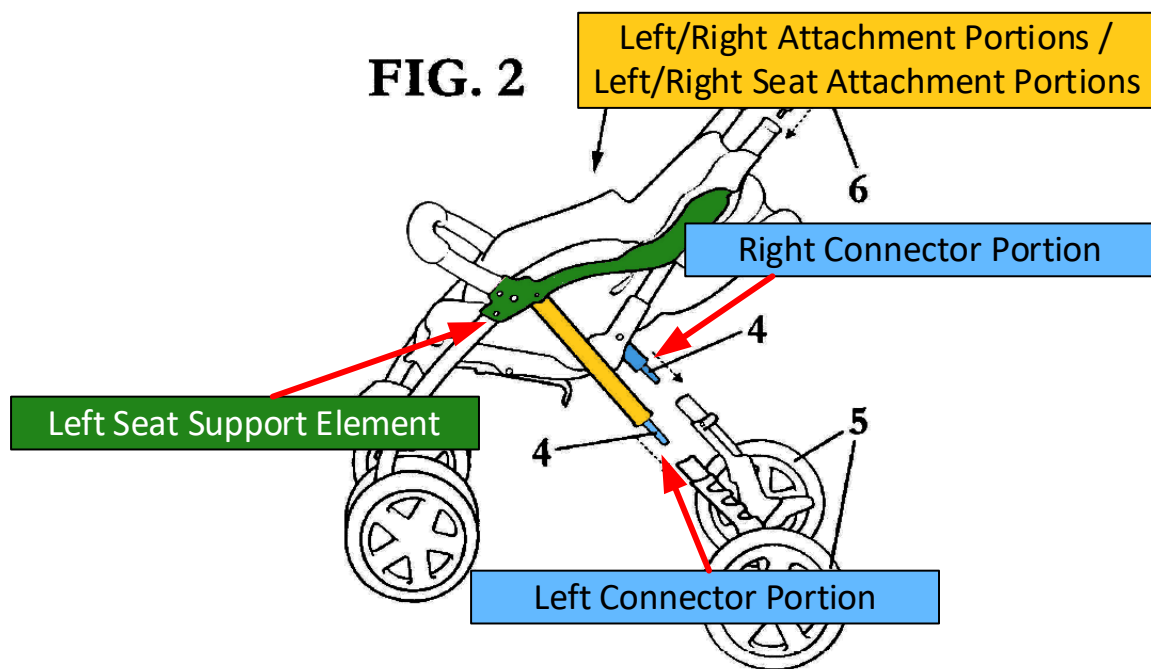
carrycot, and so forth, as shown in FIG. 5). (EX. 1063, col. 2:1-34, FIGS. 2-5, 6; EX1001 at ¶ 275) Finally, as FIG.FIGS. 5 and 6 illustrate, the seat removably connects to the seat attachment and can be oriented in a forward or backward position. (EX. 1063, col. 2:1-34, FIGS. 2-5, 6.; EX1001 at ¶ 275)

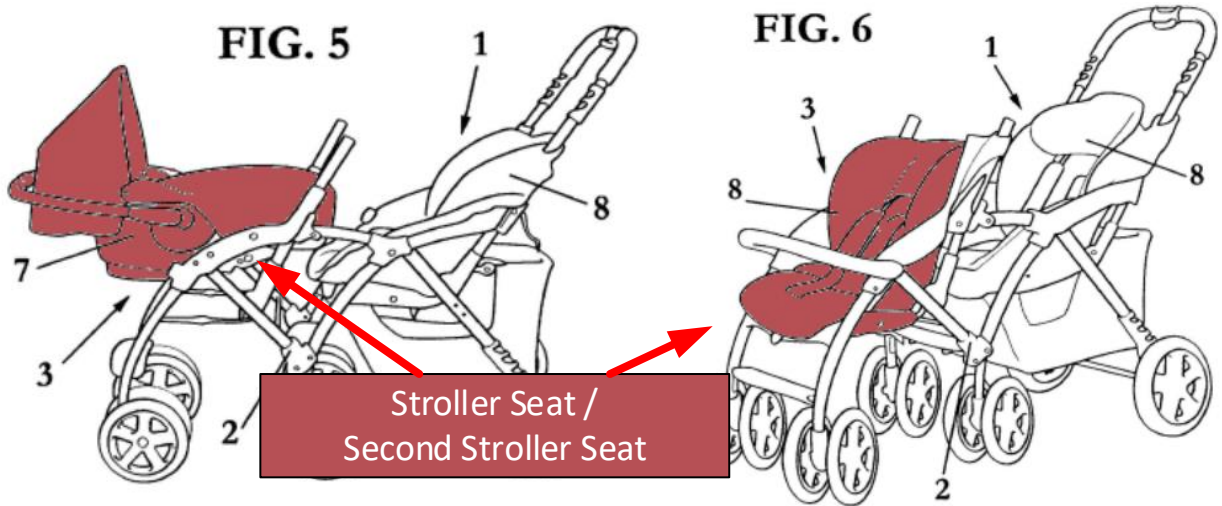
Furthermore, POSITA would have understood that Stopp's seat support elements and the overall seat connections are conventional, well-known, and that the coupling mechanism between the seat and the seat support element is a conventional connector designed to allow the seat to be easily removed and connected. (EX. 1063, col. 2:1-34, FIGS. 2-5, 6; EX1001 at ¶ 276.) 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. (EX1001 at ¶ 276.) 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. (EX1001 at ¶ 276.) 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. (EX1001 at ¶ 276.) 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. (EX1001 at ¶ 276.)

Therefore, Stopp discloses [1(b)]/[24(b)] or, alternatively, renders it obvious. (EX1001 at ¶ 277.)







(EX1063, FIGS. 2, 3, 5, 6.)

d) [1(c)-(d)]/[24(c)-(d)]

Stopp's stroller has left-right symmetry. (EX1063, FIGS. 1-6: EX1001 at ¶ 278). As illustrated in the FIG.FIGS. 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. (EX1063, col.2:1-20; EX1001 at ¶ 278.) 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. (EX1001 at ¶ 278).

Additionally, as shown in FIG. 1-6, the seat is disclosed positioned between the left and right seat support elements. (EX1063, FIGS. 1-6; EX1001 at ¶ 279).

As a result, Stopp discloses all limitations of [1(c)-(d)][24(c)-(d)] or, alternatively, renders them obvious. (EX1001 at ¶ 280.)

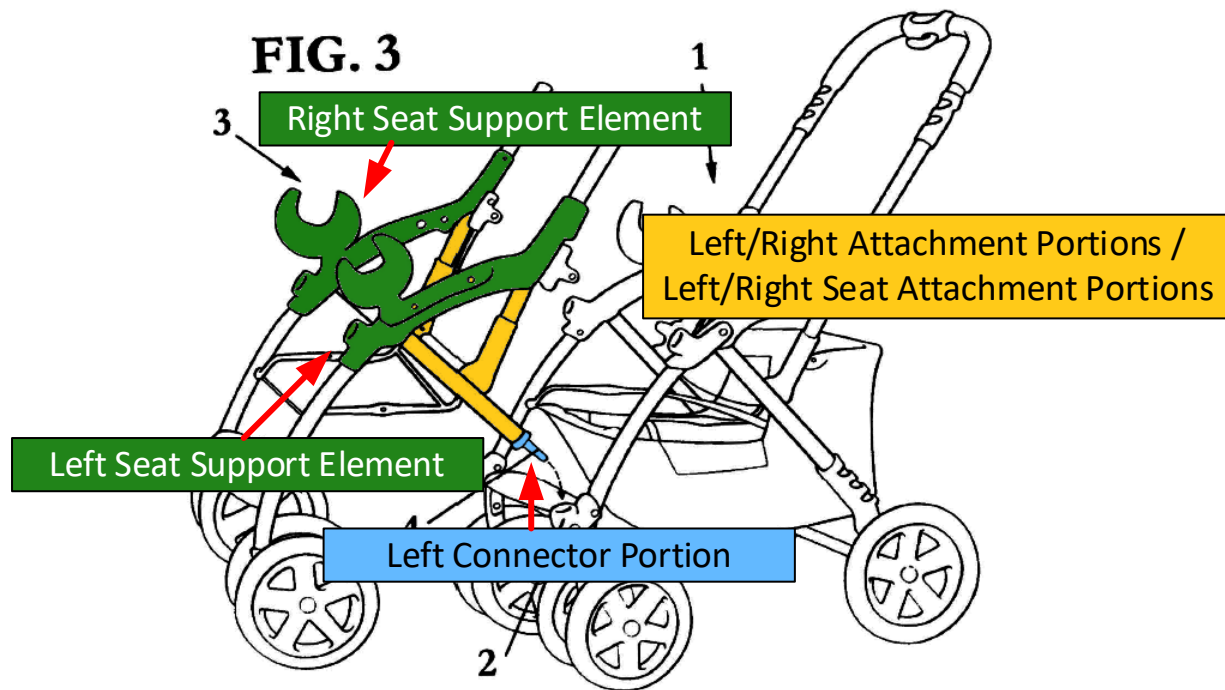


FIG. 2

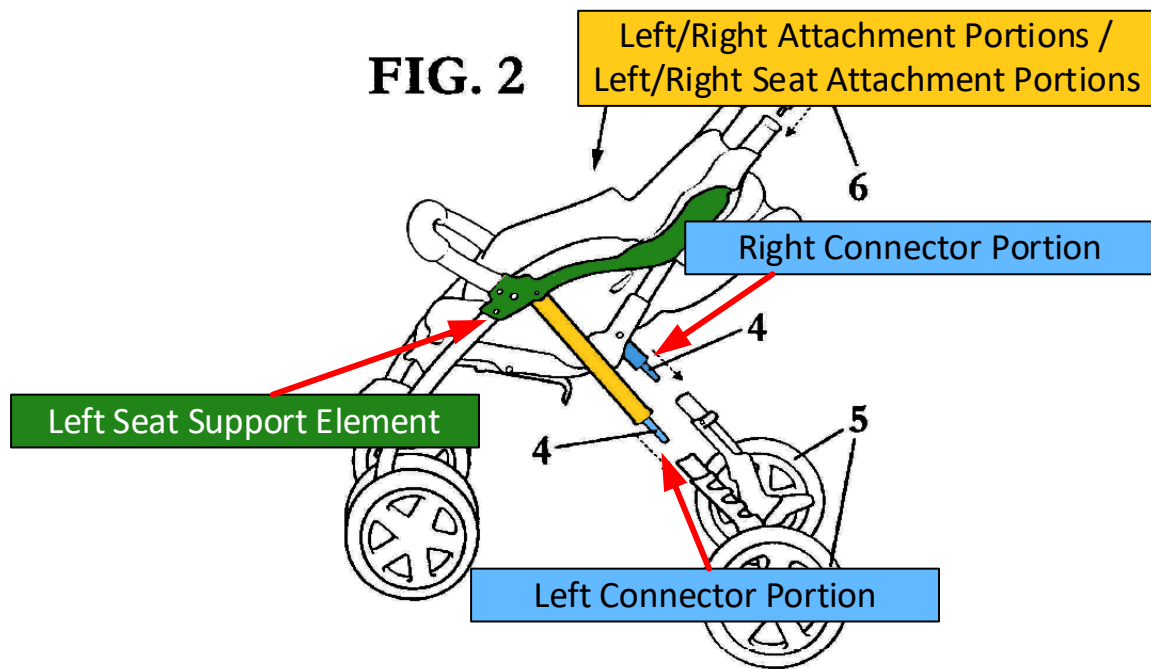
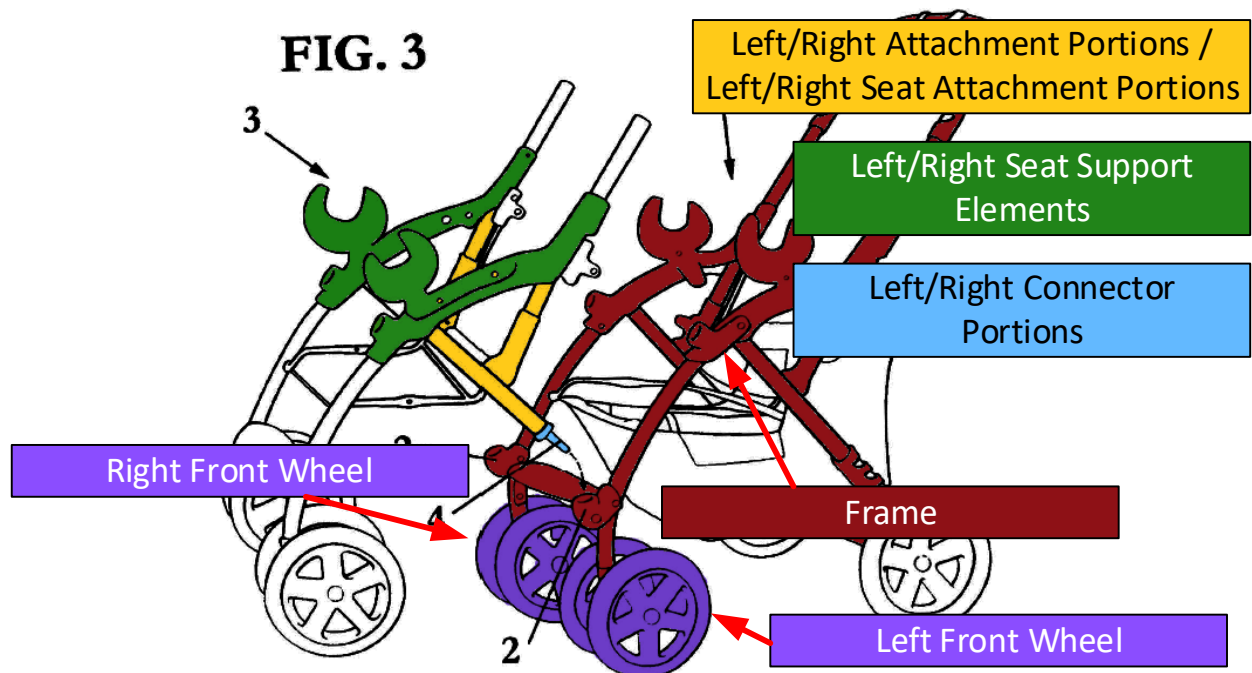
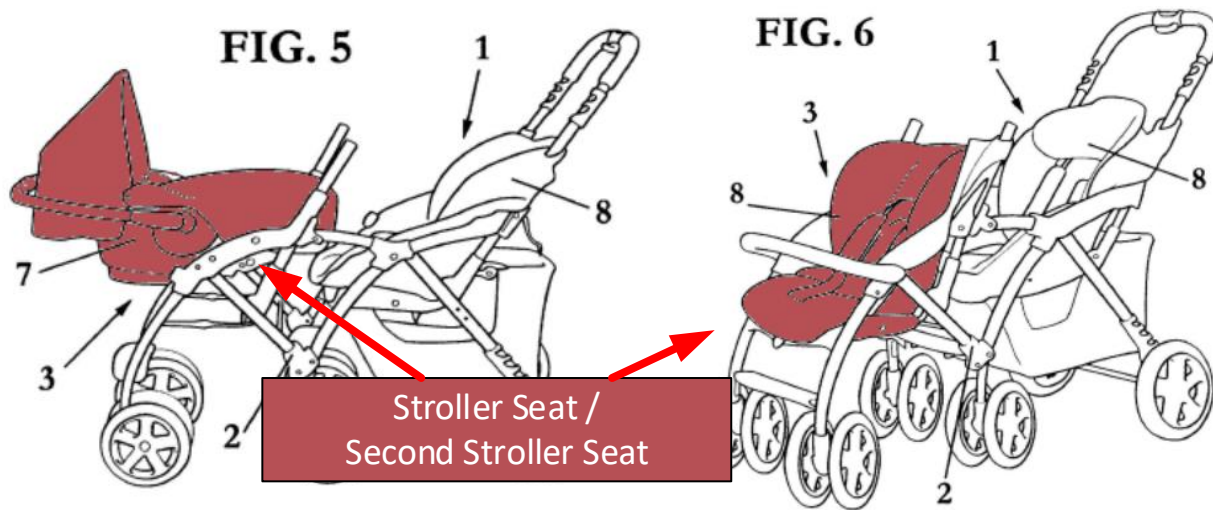


FIG. 3



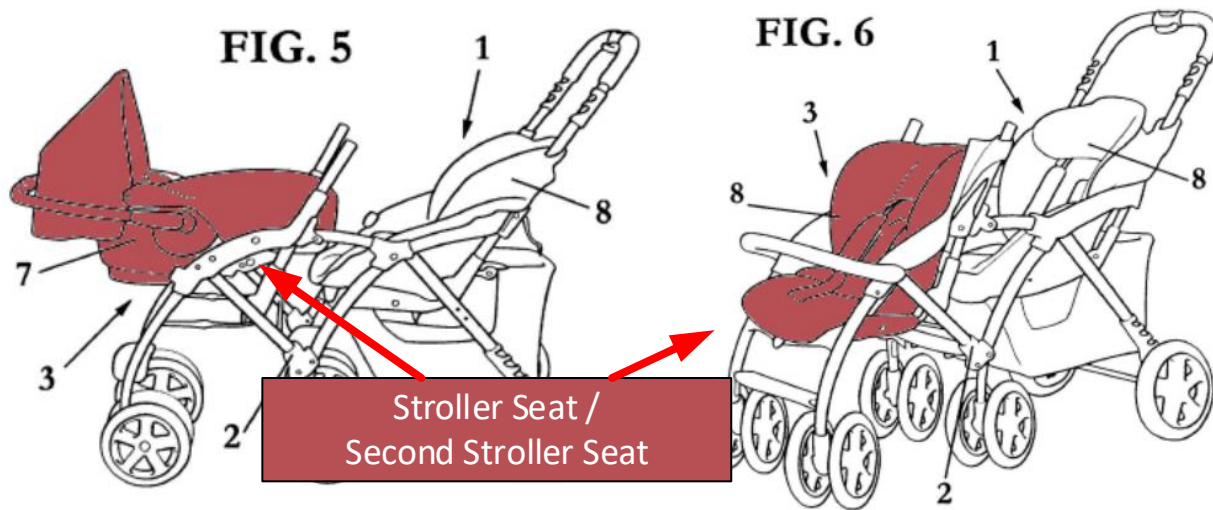


(EX1063, FIGS. 2, 3, 5, 6.)

B. Claims 2, 25

Stopp discloses that the seat may be a bassinet or a stroller seat as illustrated in FIG.FIGS. 5 and 6. (EX1063, col. 2:40-47, FIGS. 5, 6; EX1001 at ¶ 281). Stopp further discloses that the stroller can use various other seats and carrycots, as examples. (EX1063, col. 2:40-47, FIGS. 5, 6; EX1001 at ¶ 281.)

Accordingly, Stopp discloses the additional limitations of claims 2 and 25. (EX1001 at ¶ 282.)

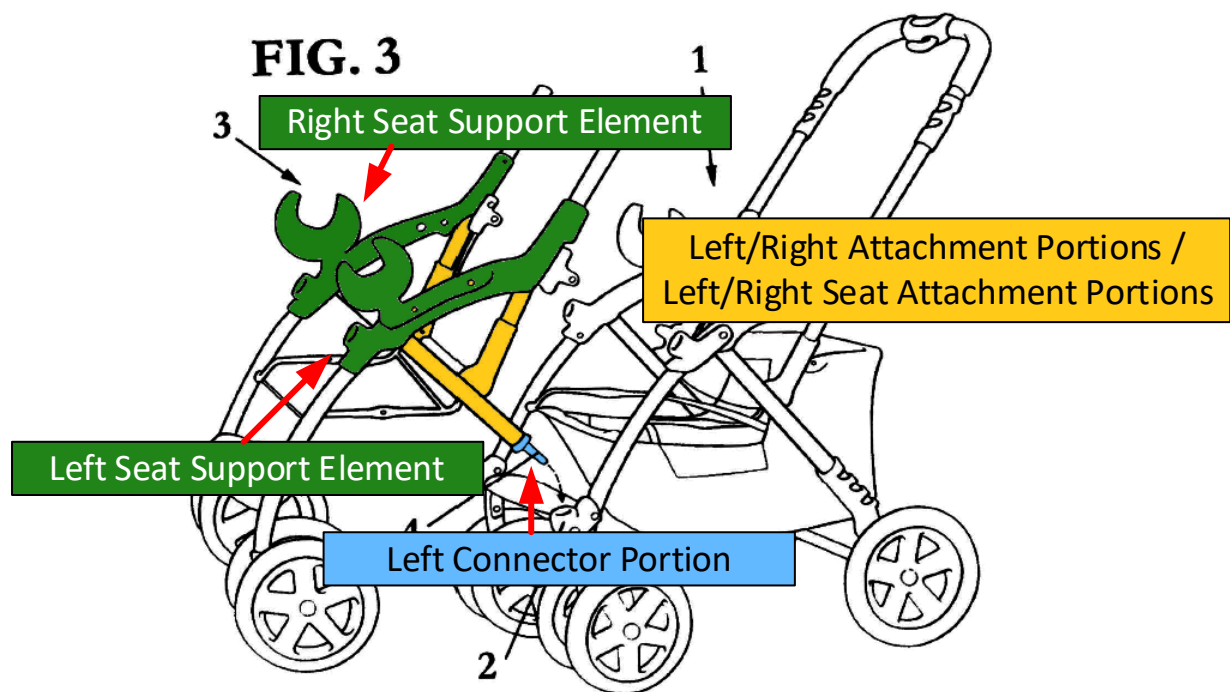


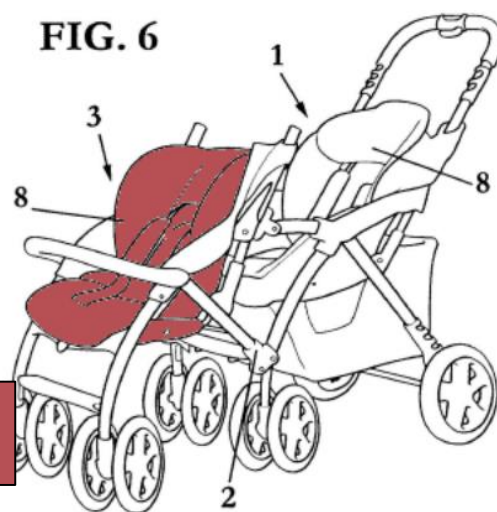
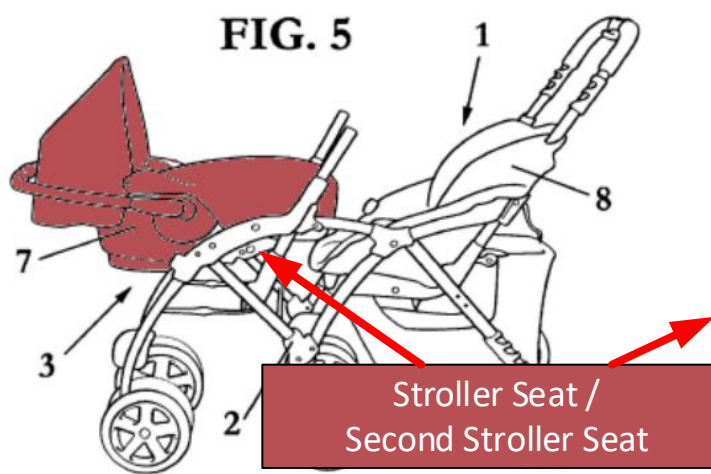
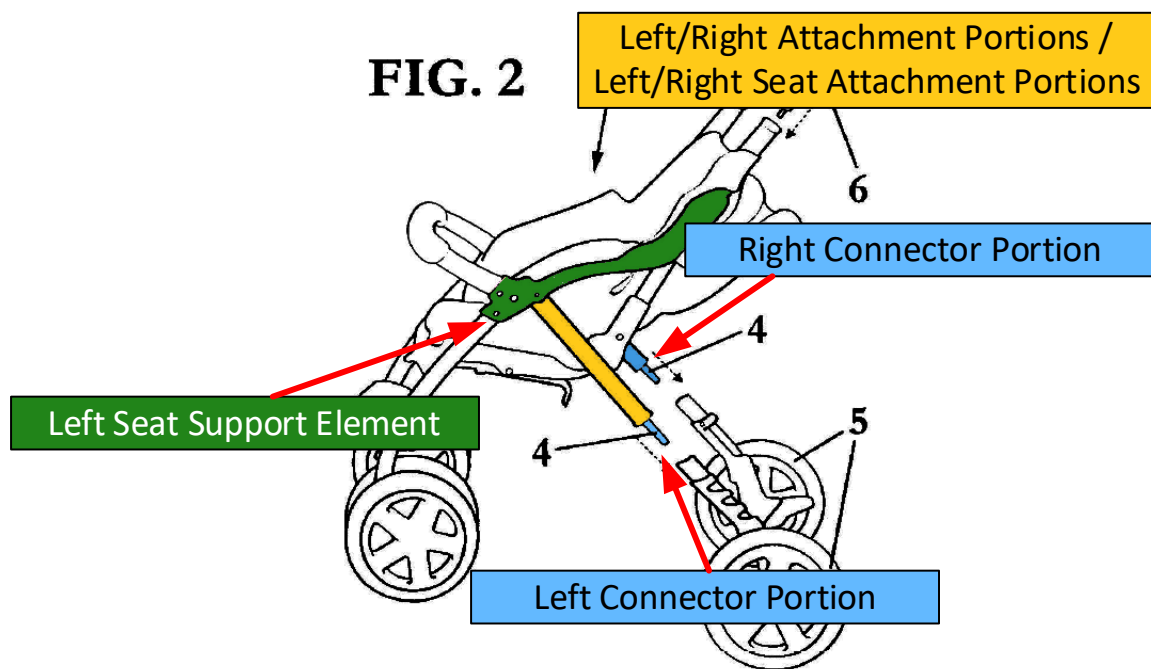
(EX1063, FIGS. 5, 6.)

C. Claims 3-5, 26-28

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; EX1001 at ¶ 283.) FIGS. 3, 5, and 6 show the stroller without seats and with seats of different types, indicating the removability of the seats. (EX1063, col. 2:1-34, FIGS. 3, 5, 6; EX1001 at ¶ 283)

Accordingly, Stopp discloses the additional limitations of claims 3-5 and 25-27. (EX1001 at ¶ 284.)





(EX1063, FIGS. 2, 3, 5, 6.)

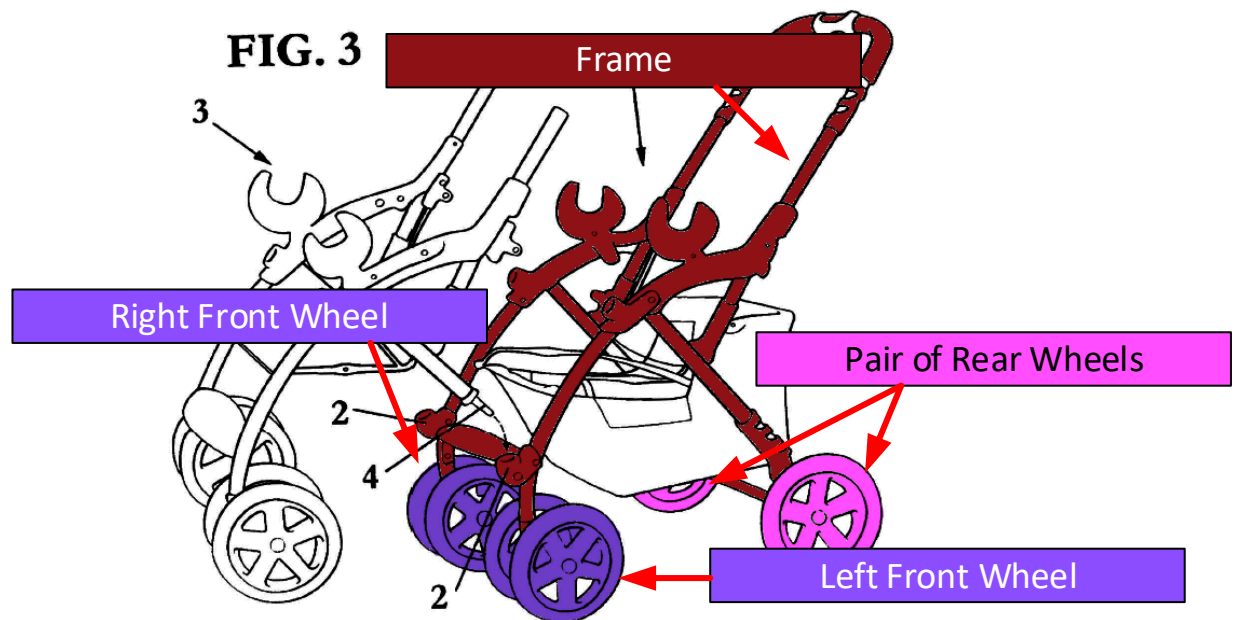
D. Independent Claim 6

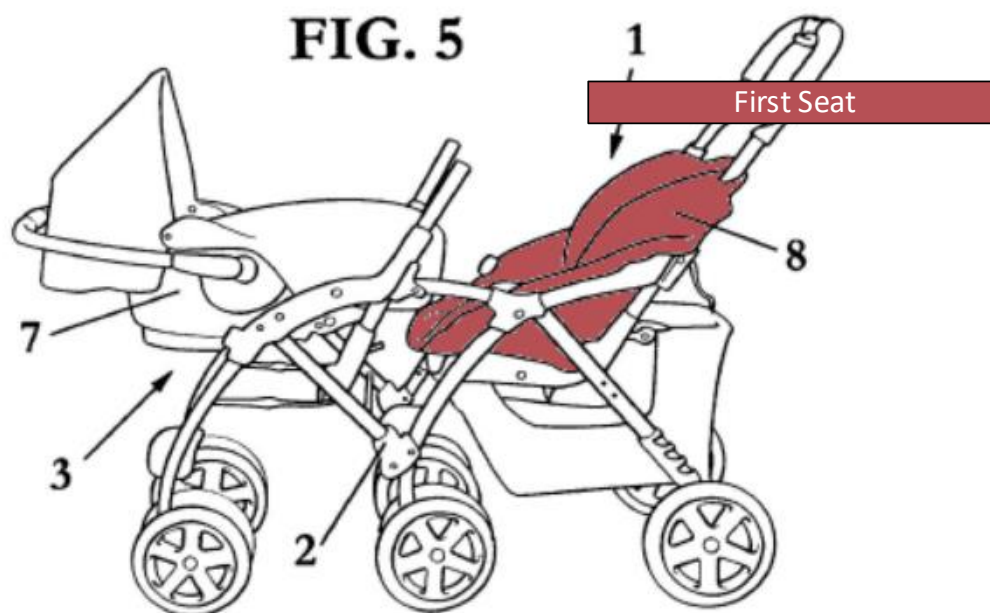
a) [6(Pre)-(d)]

As shown in FIG.FIGS. 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; EX1001 at ¶ 285.)

Accordingly, Stopp discloses [6(Pre)-(d)]. (EX1001 at ¶ 286.)



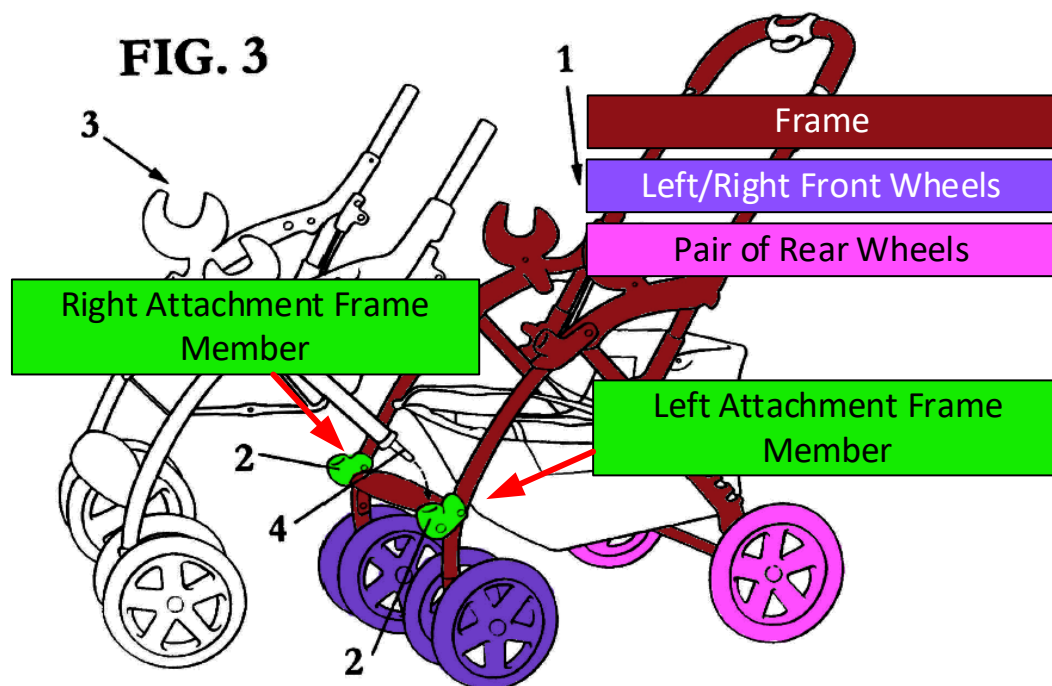


(EX1063, FIG. 3, 5.)

b) [6(e)]

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. (EX1001 at ¶ 287.) 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; EX1001 at ¶ 287.)

Therefore, Stopp discloses limitation [6(e)]. (EX1001 at ¶ 288.)

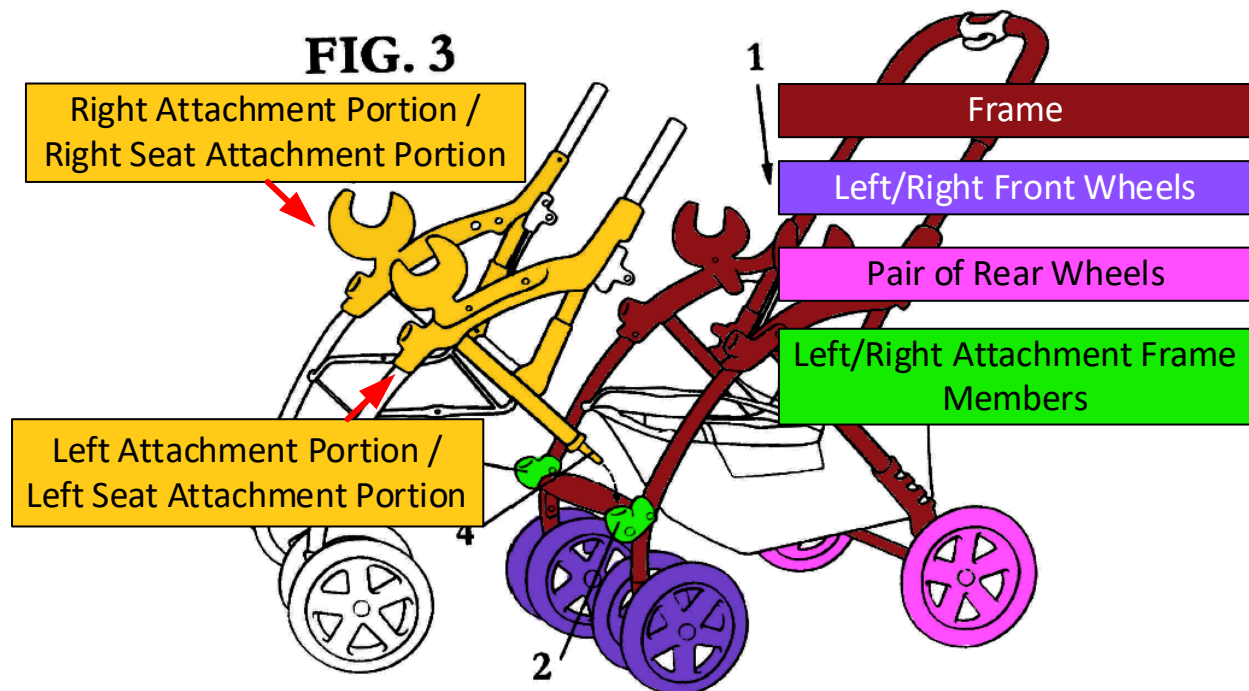


(EX1063, FIG. 3.)

c) [6(f)]

Stopp discloses that the attachment frame members receive and support separate left and right seat attachment portions. (EX1001 at ¶ 289.) Specifically, as illustrated in FIG.FIGS. 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; EX1001 at ¶ 289.)

Therefore, Stopp discloses limitation [6(f)]. (EX1001 at ¶ 290.)



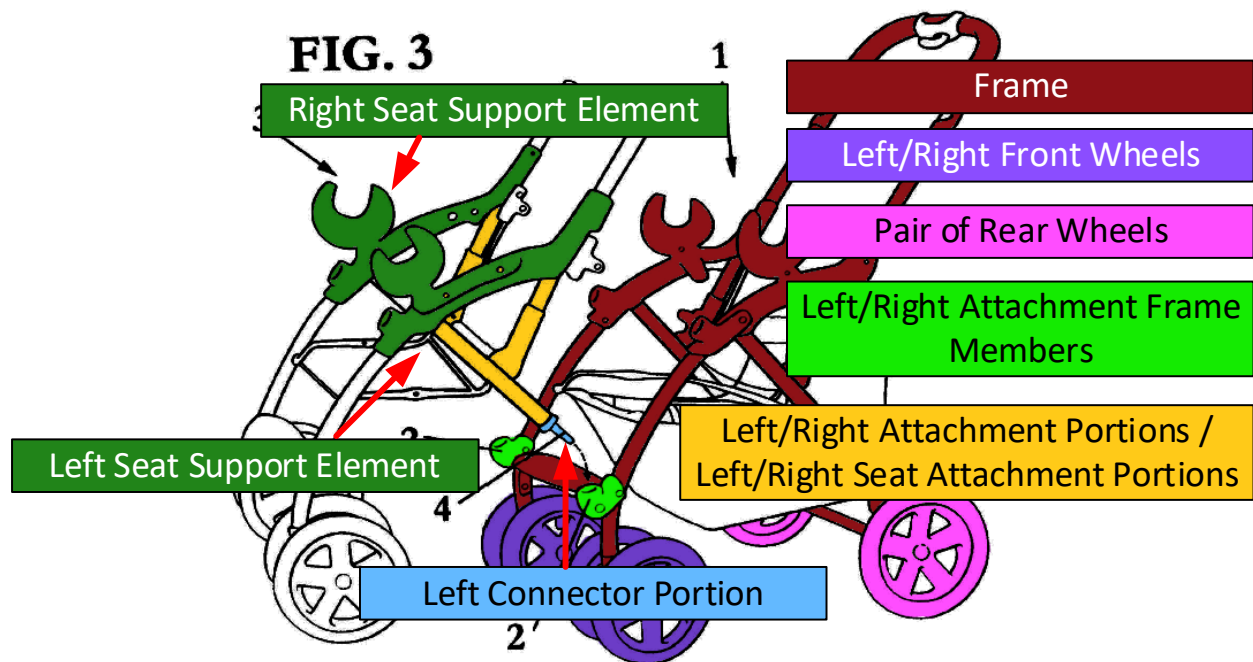
(EX1063, FIG. 3.)

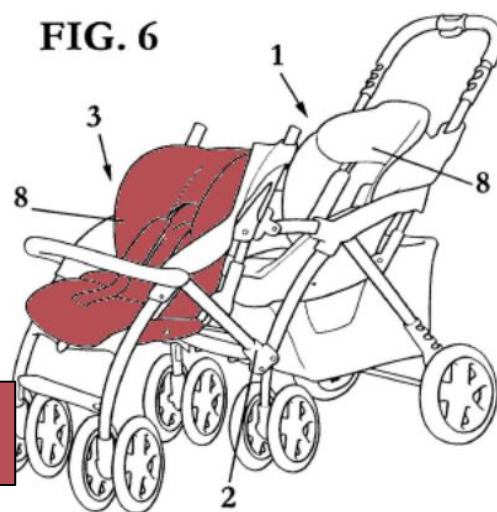
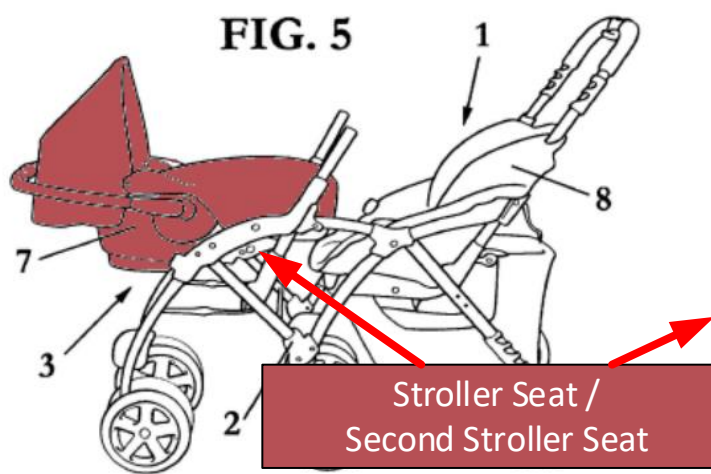
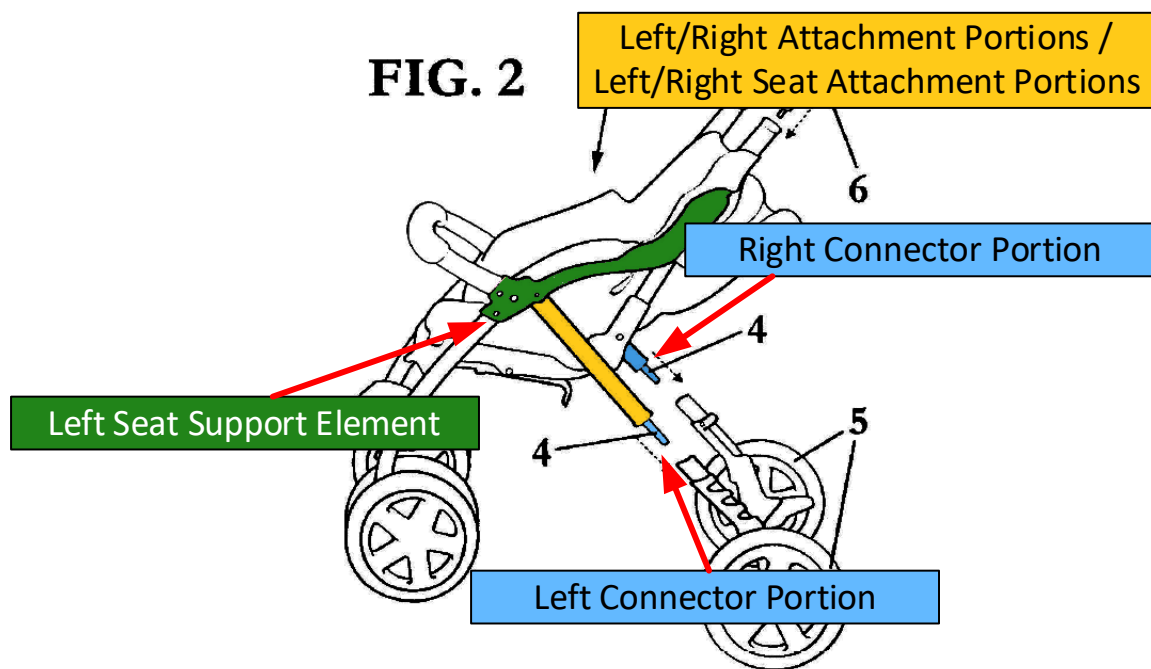
d) [6(g)]

As illustrated in FIG.FIGS. 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 FIG.FIGS. 5-6). (EX1063, FIGS. 2, 3, 5, 6; EX1001 at ¶ 291.) 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). (EX1001 at ¶ 291.) The seat support element is disclosed as being the “claw” and arm part of the seat attachment portion, as shown in FIG.FIGS. 2 and 5, and is depicted supporting

a seat that can face forward or rearward between the two seat attachment portions.
(EX1001 at ¶ 291.) FIG. 2 also better shows the right-side rod (4), which is not
illustrated in FIGS. 5 and 6. (EX1063, col. 2:1-34; EX1001 at ¶ 291.)

Accordingly, Stopp discloses, or alternatively renders obvious, limitation
[6(g)]. (EX1001 at ¶ 292.)



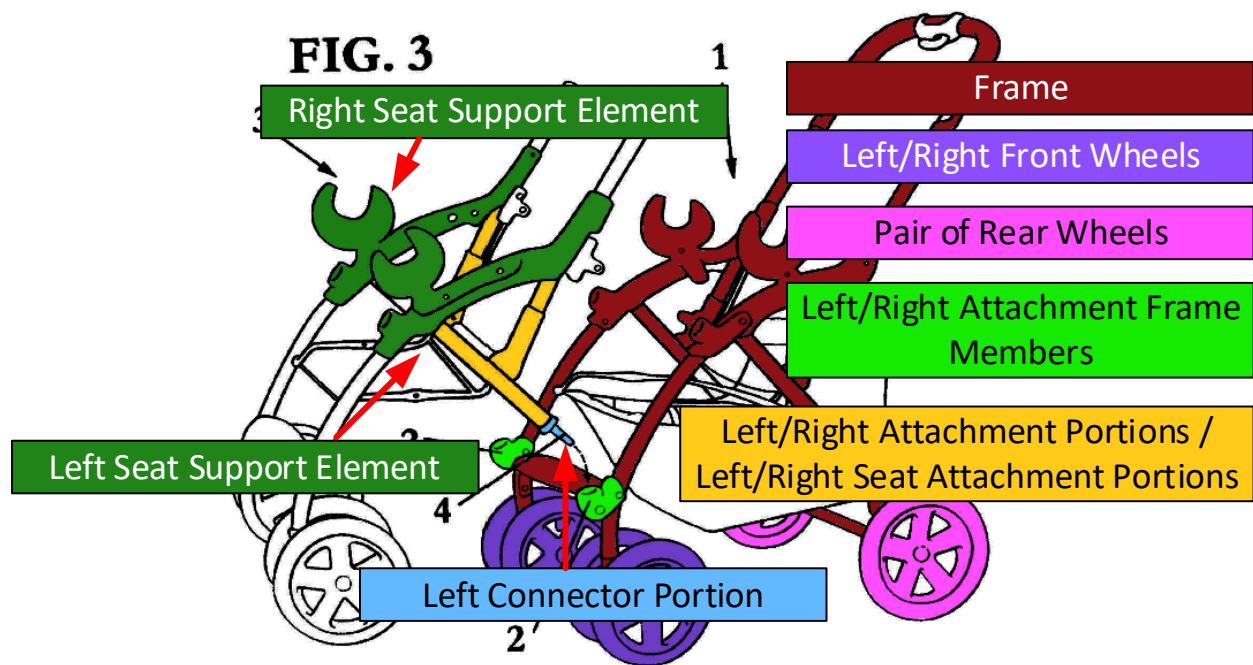


(EX1063, FIGS. 2, 3, 5, 6.)

E. Claim 7

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; EX1001 at ¶ 293). 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. (EX1063, col. 2:20-34, FIGS. 1-3; EX1001 at ¶ 293.)

Accordingly, Stopp discloses, or alternatively renders obvious, the additional limitations of claim 7. (EX1001 at ¶ 294.)

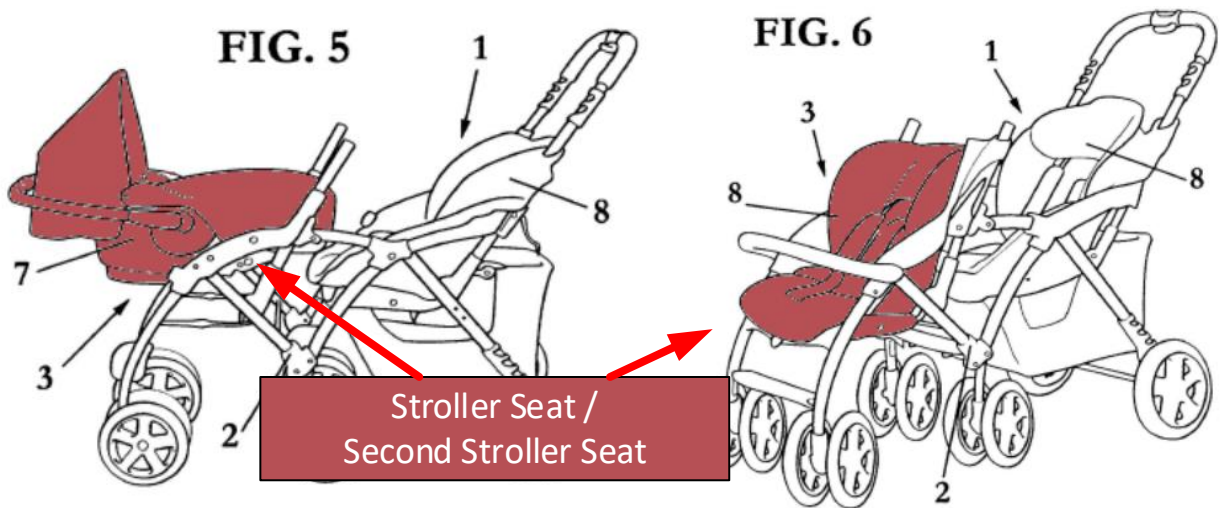


(EX1063, FIG. 3.)

F. Claim 8

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; EX1001 at ¶ 295.)

Accordingly, Stopp discloses the additional limitations of claim 8. (EX1001 at ¶ 296.)



(EX1063, FIG. 5, 8.)

G. Independent Claim 9

a) [9(Pre)-(a)]

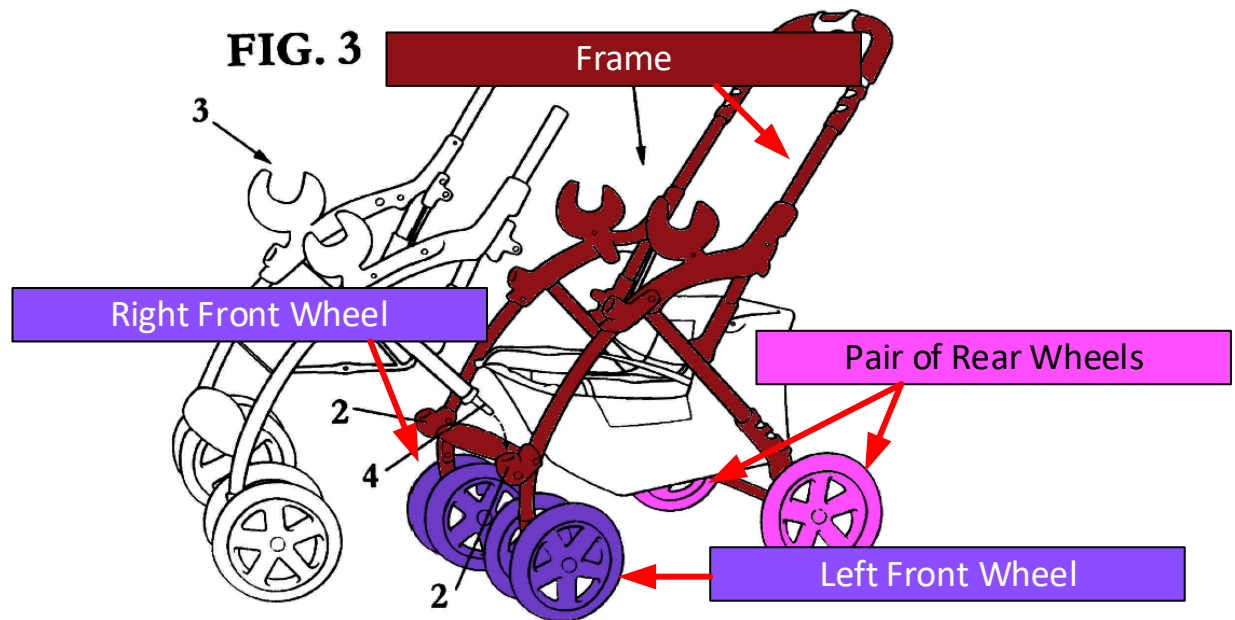
As shown in FIG.FIGS. 1-6, Stopp discloses a stroller with a seat reversibly and removably connected to the stroller frame, as well as left and right front

wheels. (EX1063, col. 2:1-34, FIGS. 1-6; EX1001 at ¶ 297) 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; EX1001 at ¶ 297). 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. (EX1063, col. 2:1-20; EX1001 at ¶ 297)

Furthermore, POSITA would have understood that Stopp's seat connections are conventional. (EX1063, col. 2:1-20; EX1001 at ¶ 298.) 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. (EX1001 at ¶ 298.) 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. (EX1001 at ¶ 298.)

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. (EX1001 at ¶ 298.)

Accordingly, Stopp discloses, or alternatively, renders obvious limitations [9(Pre)-9(a)]. (EX1001 at ¶ 299.)



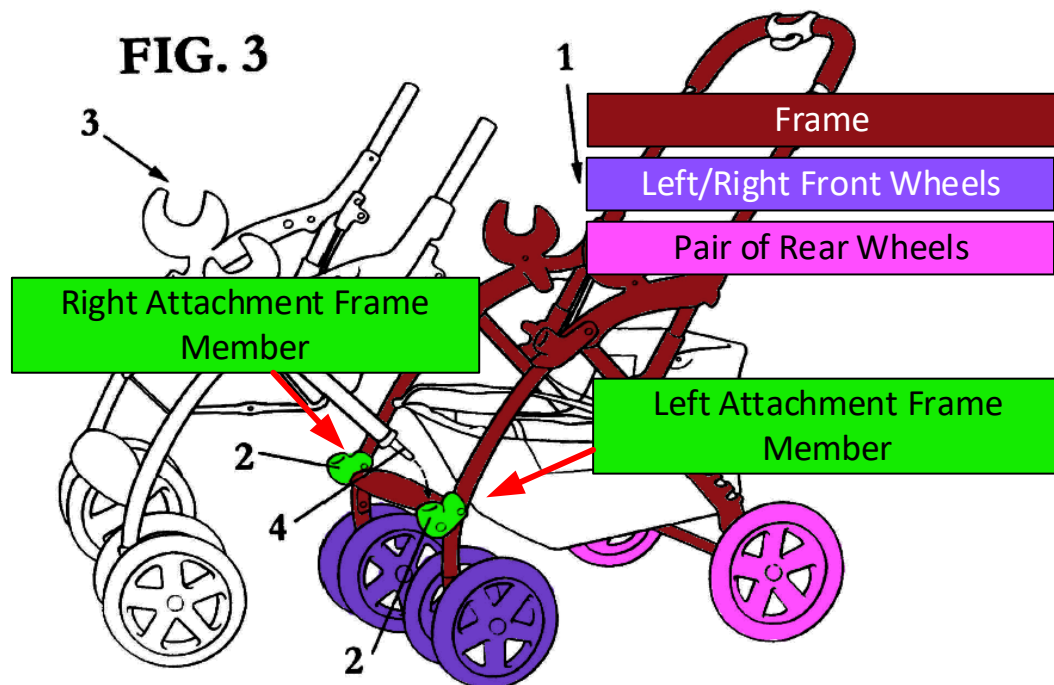
(EX1063, FIG. 3.)

b) [9(b)-(c)]

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; EX1001 at ¶ 300.) 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*, §§ IX(A), (D). (EX1063, col. 2:1-34; EX1001 at ¶ 300.)

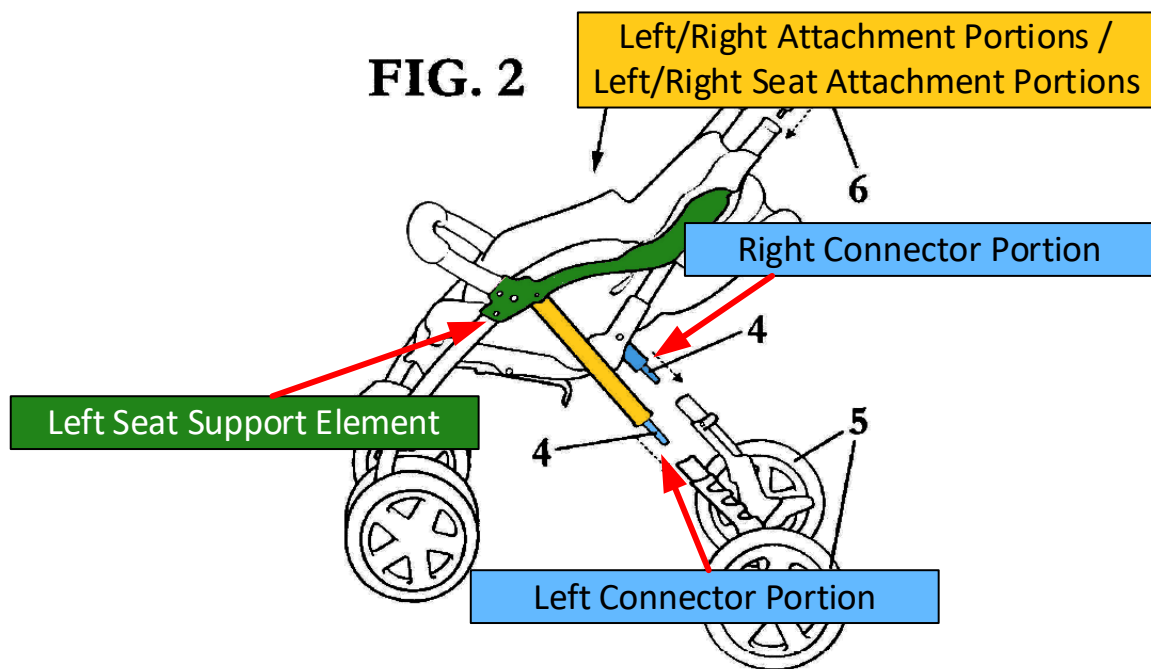
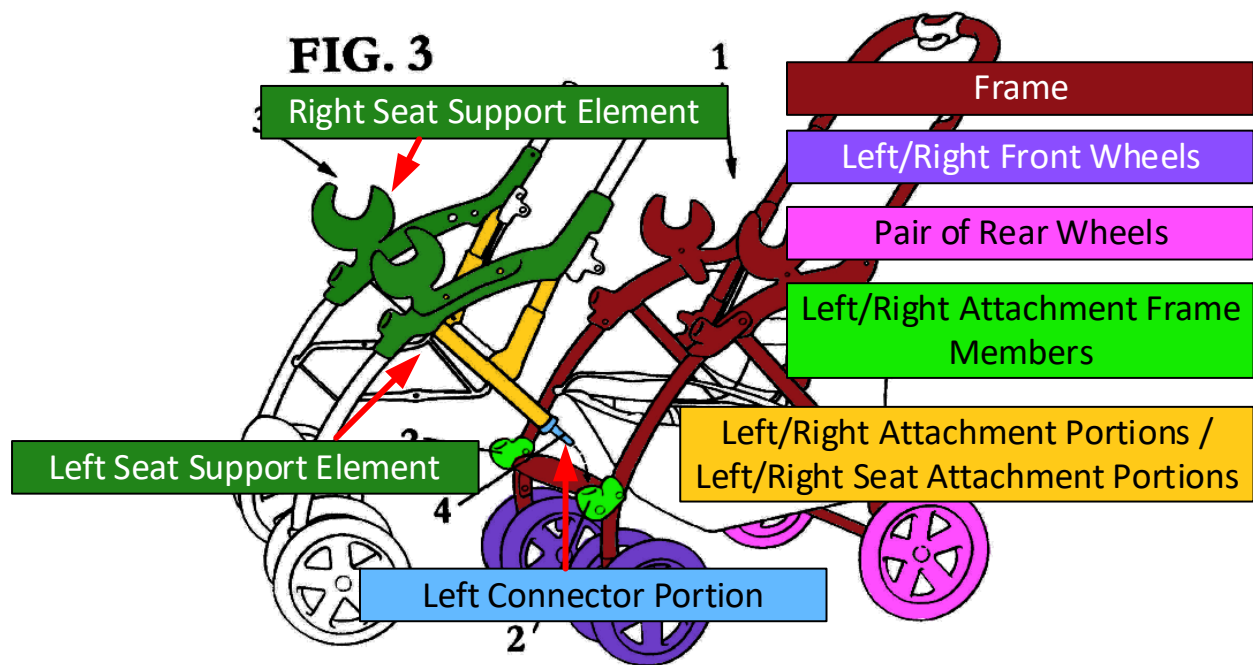
Accordingly, Stopp discloses limitations [9(b)-(c)]. (EX1001 at ¶ 301.)

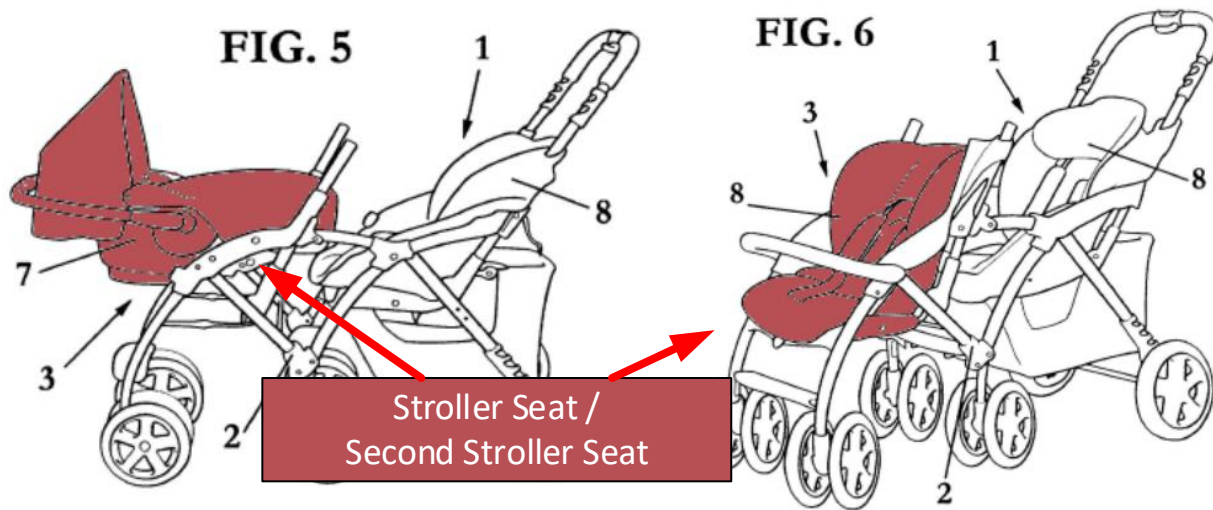


(EX1063, FIG. 3.)

c) [9(d)-(f)]

As discussed with respect to claims 1 and 6, *supra*, §§ IX(A), (D), Stopp includes left and right side seat attachment portions, as shown in FIG. 3. (EX1063, col. 2:1-20, FIG. 3; EX1001 at ¶ 302.) These attachment portions convert a single





(EX1063, FIG. 2, 3, 5, 6.)

H. Claim 10

Stopp 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; EX1001 at ¶ 305.) The seat attachment includes functionality for supporting a seat in a forward or rear-facing configurations, as shown in FIG.FIGS. 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. (EX1063, FIGS. 5, 6 (rear-front carry-cot in FIG. 5 and front-facing seat in FIG. 6); EX1001 at ¶ 305.)

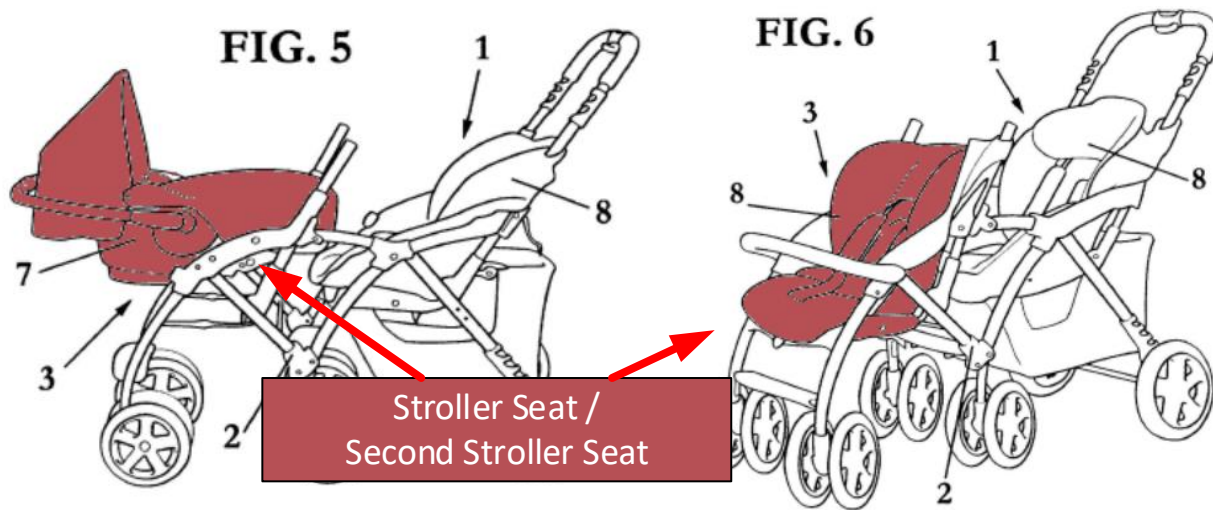
Furthermore, as laid out in the discussion of claim 9, *supra* § IX(G), connections for permitting a seat to face both forward and backward were conventional and well-known at the time of invention, and it would have been obvious to POSITA to use such connections to releasably connect a seat to the stroller of Stopp. (EX1001 at 306.)

Accordingly, Stopp discloses, or alternatively renders obvious, the additional limitations of claim 10. (EX1001 at 307.)

I. Claim 11

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; EX1001 at ¶ 308.)

Accordingly, Stopp discloses the additional limitations of claim 11. (EX1001 at ¶ 309.)



(EX1063, FIG. 5, 6.)

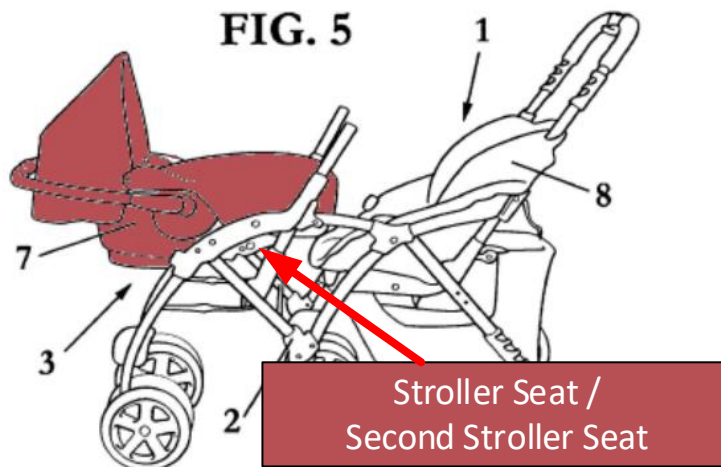
J. Claim 12

As shown in FIG. 5, Stopp discloses the second seat being a bassinet.

(EX1063, col. 2:40-49, FIG. 5; EX1001 at ¶ 310.)

Accordingly, Stopp discloses the additional limitations of claim 12.

(EX1001 at ¶ 311.)



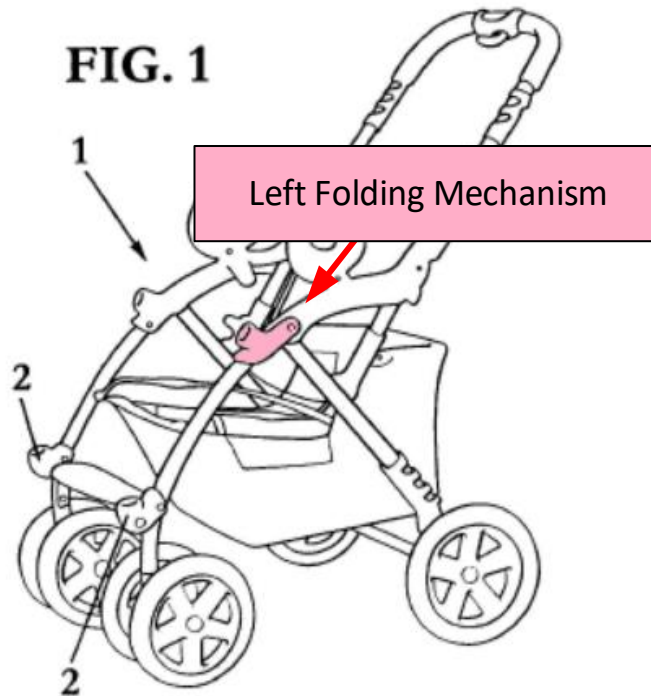
(EX1063, FIG. 5.)

K. Claim 13

Stopp discloses a folding mechanism on each side of the stroller frame, as best seen and labeled in FIG. 1. (EX1001 at ¶ 312.) 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; EX1001 at ¶ 312). 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. (EX1001 at ¶ 312.) 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. (EX1001 at ¶ 312.) POSITA would have

reasonably expected success because conventional elements, such as folding mechanisms, are well-known and well-within POSITA's skill to implement.

(EX1001 at ¶ 312.)



(EX1063, FIG. 1.)

Accordingly, Stopp discloses, or alternatively renders obvious, the additional limitations of claim 13. (EX1001 at ¶ 313.)

L. Claim 14

Stopp discloses a releasable connection, including a button or a locking tab, to secure the first stroller seat, as best seen and labeled in FIG. 1. (EX1001 at ¶ 314.) 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-

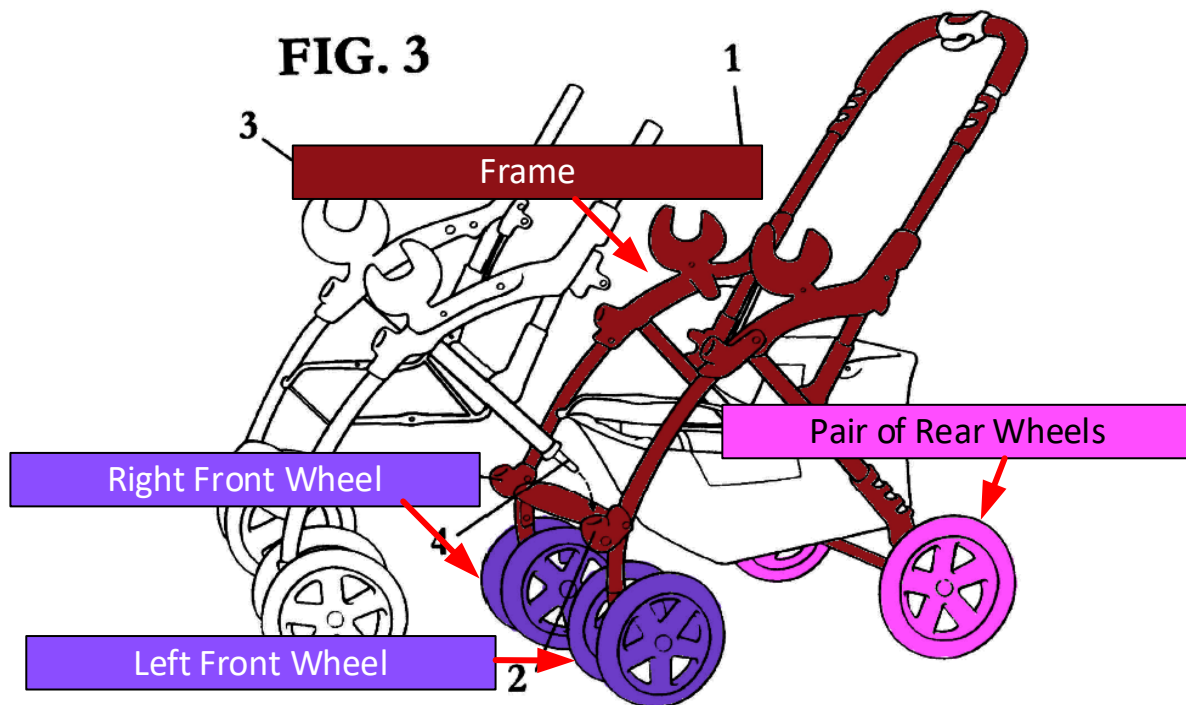
20; EX1001 at ¶ 314.) At the time, many conventional strollers included a releasable connection for securing a seat to the stroller, including a button or a locking tab and it was well-known to do so. (EX1001 at ¶ 314.) Thus, at minimum, it would have been obvious to POSITA to use a releasable connection 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. (EX1001 at ¶ 314.) POSITA would have reasonably expected success because these elements are conventional and modifying Stopp to use them is well-within POSITA's skill. (EX1001 at ¶ 314.)

Accordingly, Stopp discloses, or alternatively renders obvious, the additional limitations of claim 14. (EX1001 at ¶ 315.)

M. Claim 15

Stopp discloses a pair of back wheels as shown in FIG. 1 and 3. (EX1063, FIGS. 1, 3; EX1001 at ¶ 316.)

Accordingly, Stopp discloses the additional limitations of claim 15. (EX1001 at ¶ 317.)



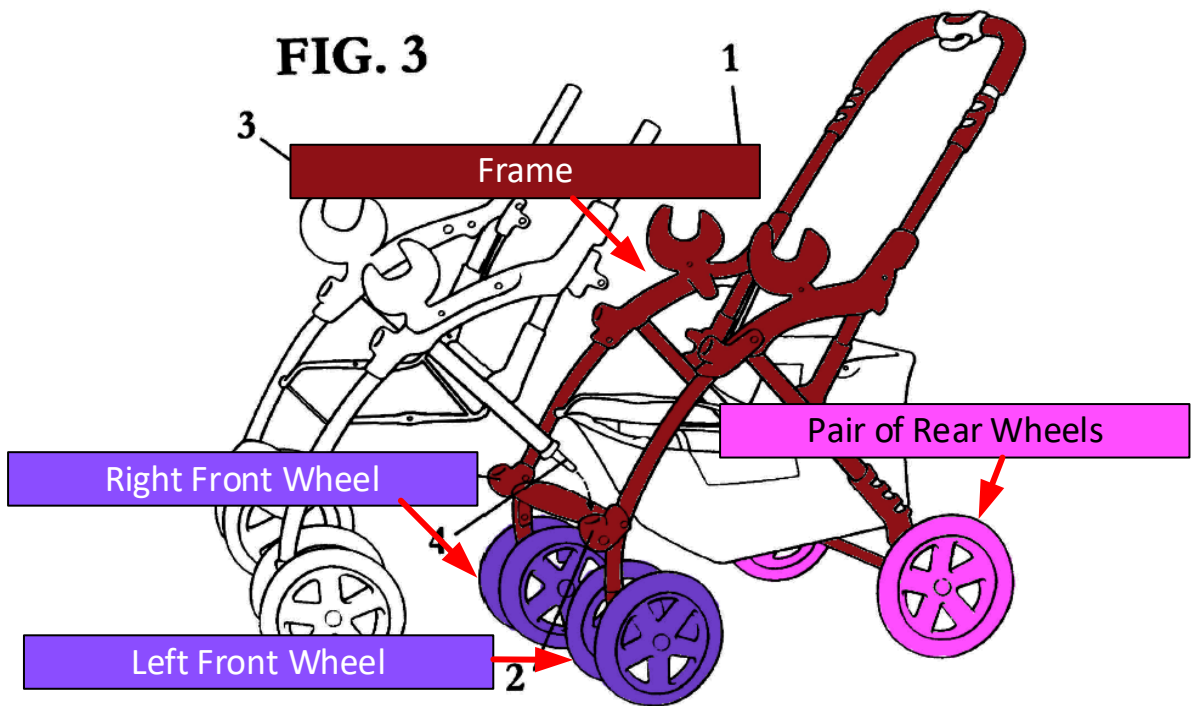
(EX1063, FIG. 3.)

N. Claim 16

Stopp discloses a pivoting pair of front wheels on individual axes and a fixed pair of wheels in the back. (EX1063, FIGS. 1, 3; EX1001 at ¶ 318.) 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). (EX1001 at ¶ 318.)

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. (EX1001 at ¶ 318.) 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. (EX1001 at ¶ 319.) POSITA would have known that this rectangular configuration would not be capable of pivoting as illustrated, teaching that the rear wheels are fixed. (EX1001 at ¶ 319) 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. (EX1001 at ¶ 319).

Accordingly, Stopp discloses, or alternatively renders obvious, the additional limitations of claim 16. (EX1001 at ¶ 320.)



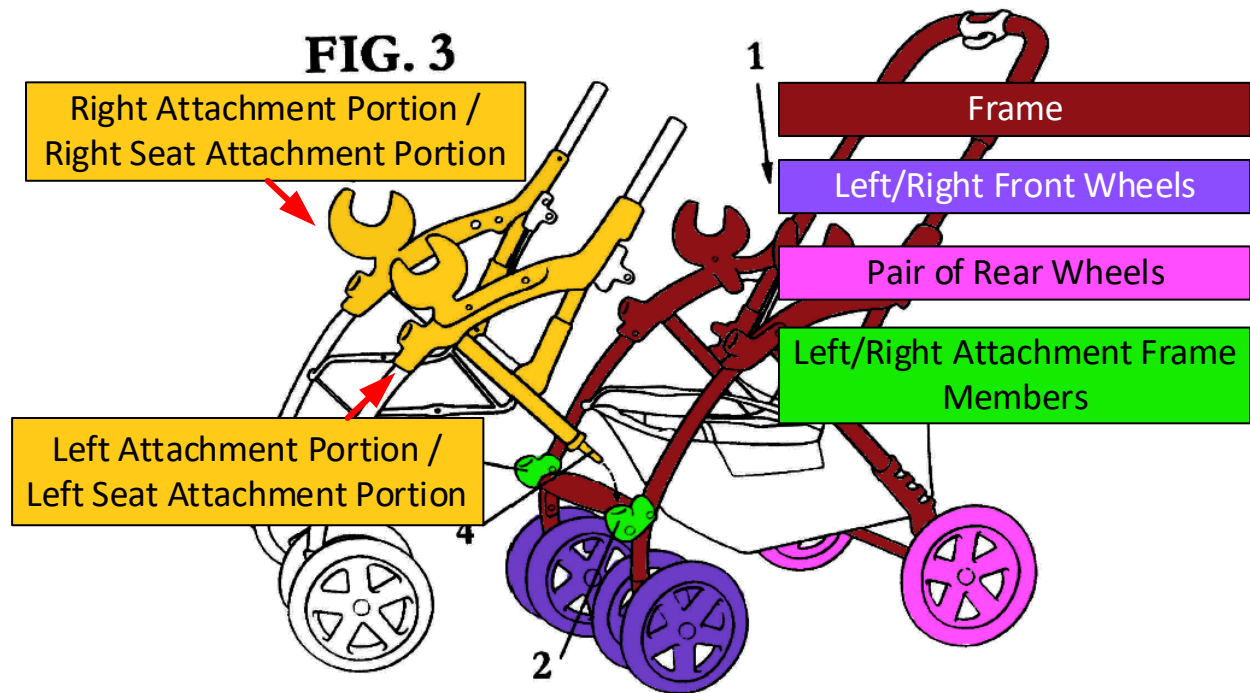
(EX1063, FIG. 3.)

O. Claim 17

Stopp discloses left and right side attachment frame members. (EX1001 at ¶ 321.) 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; EX1001 at ¶ 321.)

Accordingly, Stopp discloses the additional limitations of claim 17.

(EX1001 at ¶ 322.)



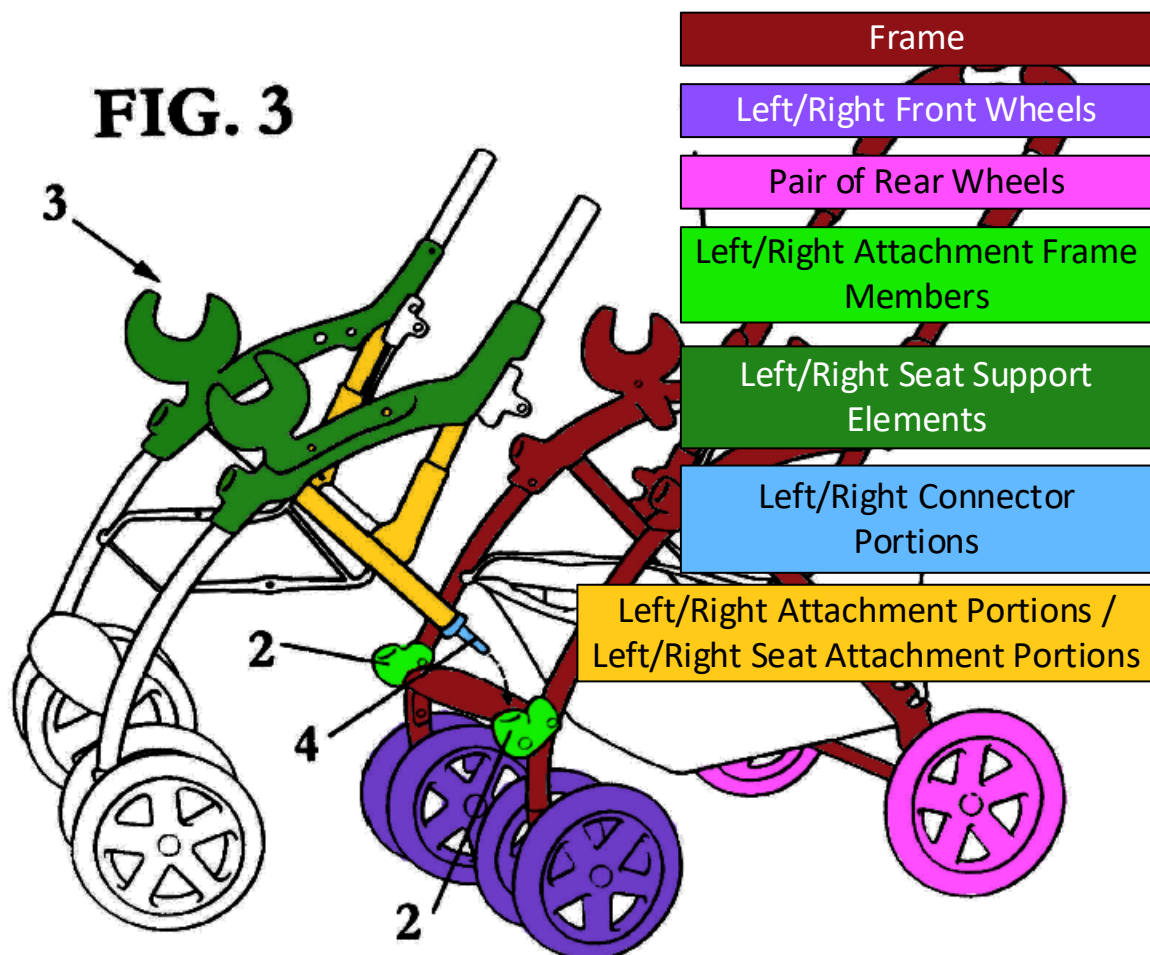
(EX1063, FIG. 3.)

P. Claims 18-23

Stopp discloses all the additional limitations of claims 18-23. (EX1001 at ¶ 323.) 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 FIG.FIGS. 2-3 and 5. (EX1063, col. 2: 1-34, FIG. 3; EX1001 at ¶ 323.) 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 FIG.FIGS. 2-3 and 5. (EX1063, FIGS. 2, 3, 5; EX1001 at ¶ 323.)

Accordingly, Stopp discloses the additional limitations of claims 18-23. (EX1001 at ¶ 324.)

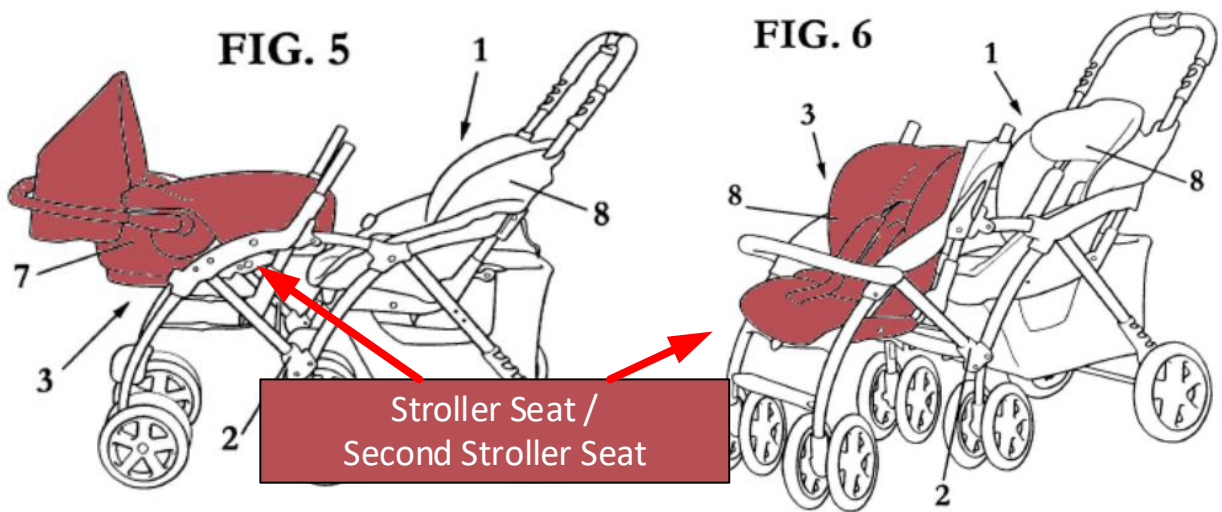


(EX1063, FIG. 3.)

Q. Claim 29

Stopp disclose a stroller seat connected between left and right seat support elements as shown in FIG. 6. (EX1063, FIGS. 1-6; EX1001 at ¶ 325.)

Accordingly, Stopp discloses the additional limitations of claim 29. (EX1001 at ¶ 326.)



(EX1063, FIG. 5, 6.)

R. Claim 30

Stopp discloses a seat attachment where both connector portions reversibly connect to the stroller with friction fittings and/or interference fits, as depicted in FIG.FIGS. 3-4. (EX1063, FIGS. 3, 4; EX1001 at ¶ 327.). 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. (EX1063, col. 2:1-20; EX1001 at ¶ 327.). 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. (EX1001 at ¶ 327.) 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. (EX1001 at ¶ 327.) 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. (EX1001 at ¶ 327.) POSITA would have reasonably expected success because the modifications to Stopp are conventional, straightforward, and well-within POSITA's skill. (EX1001 at ¶ 327.)

Accordingly, Stopp discloses, or alternatively renders obvious, the subject matter of claim 30. (EX1001 at ¶ 328.)

X. GROUND 4 – STOPP IN VIEW OF CHEN

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

A. Independent Claims 1 & 24

As discussed *supra* § IX, Stopp discloses a seat attachment for a stroller comprising separate left and right attachment portions with seat support elements. (EX1001 at ¶ 330.) Chen discloses receptacles (32, 33) for a stroller into which inserts (41, 51) for seats can be removably inserted. (EX1065, ¶¶ 5-8, 24; EX1001 at ¶ 330.) The inserts and receptacles permit the seat to face forward or backward. (EX1065, ¶¶ 5-8, ¶¶ 24, 26, FIGS. 5 & 11; EX1001 at ¶ 330.)

To the extent that PO 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; EX1001 at ¶ 331.) 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. (EX1065, ¶¶ 5-6, 24; EX1001 at ¶ 331.)

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. (EX1001 at ¶ 332.)

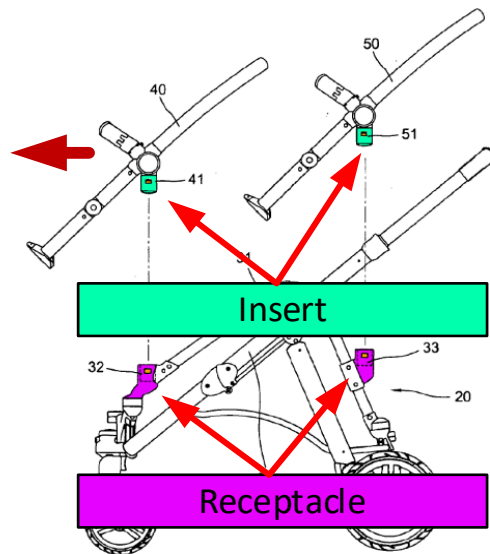


FIG. 5

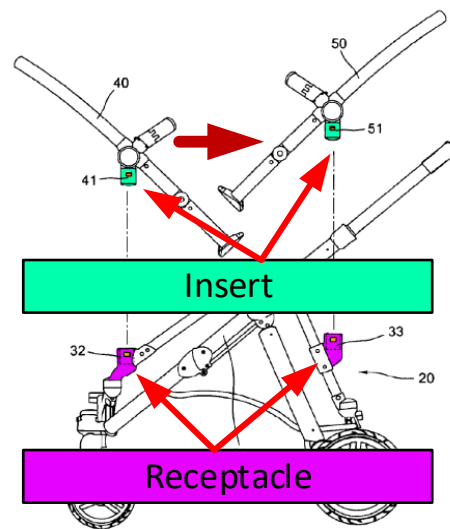


FIG. 11

(EX1065, FIG. 6, 11.)

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* § IX(A). (EX1001 at ¶ 333.)⁵

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; EX1001 at ¶ 334.)

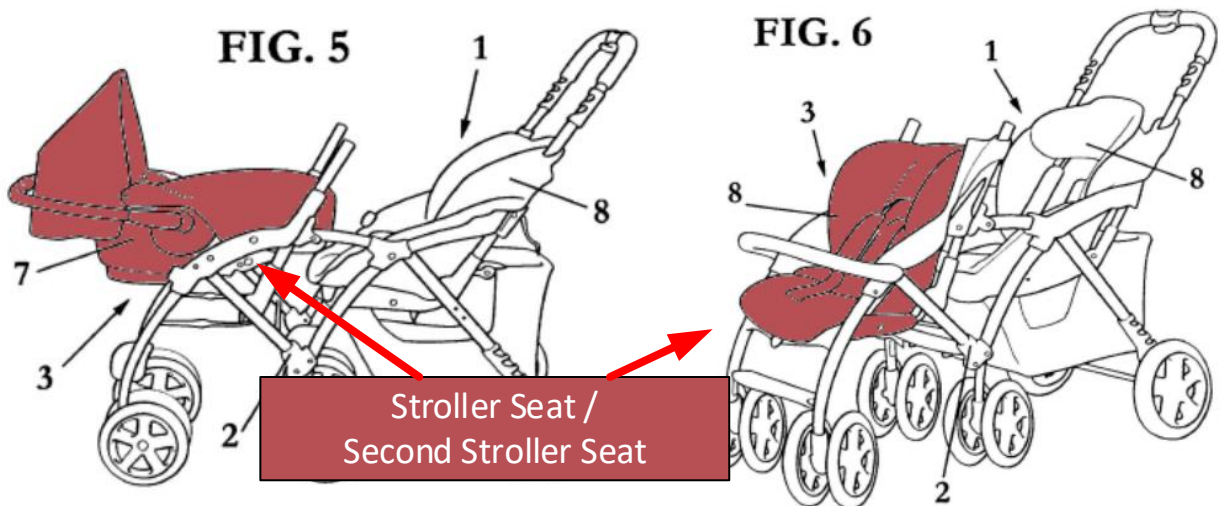
Accordingly, POSITA would have understood that Stopp in view of Chen discloses the subject matter of claim 1. (EX1001 at ¶ 335.)

B. Claims 2 & 25

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* § IX(B). (EX1001 at ¶ 336.)

⁵ If Stopp already discloses or renders obvious given subject matter, then the combination of Stopp with Chen must also disclose that subject matter.

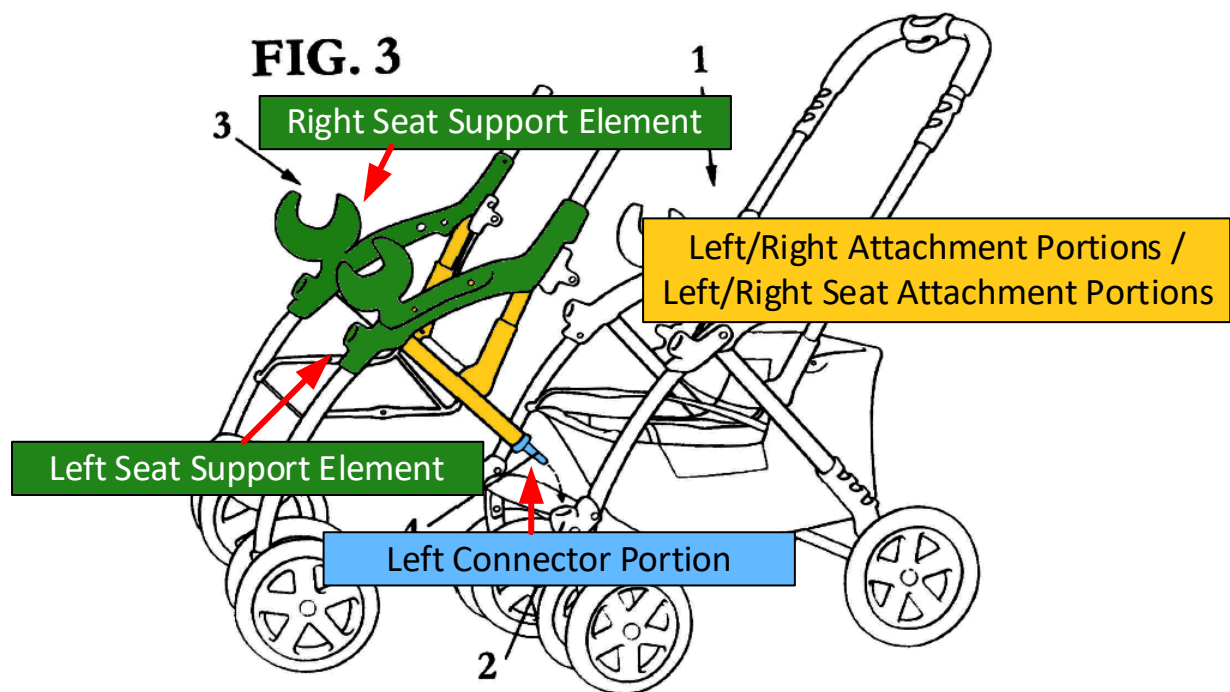
To the extent PO argues that Stopp alone does not disclose the elements of claims 2 and 25, Chen also discloses that the seats are stroller seats. (EX1065, ¶¶ 5-8, 24-28; EX1001 at ¶ 337.) It would have been obvious to POSITA to use stroller seats in a stroller since stroller seats permit an infant to be carried by the stroller and are a standard feature of prior art strollers. (EX1065, ¶¶ 5-8, 24-28; EX1001 at ¶ 337.)

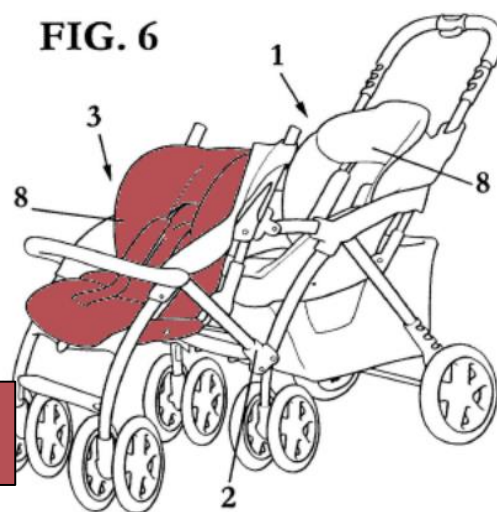
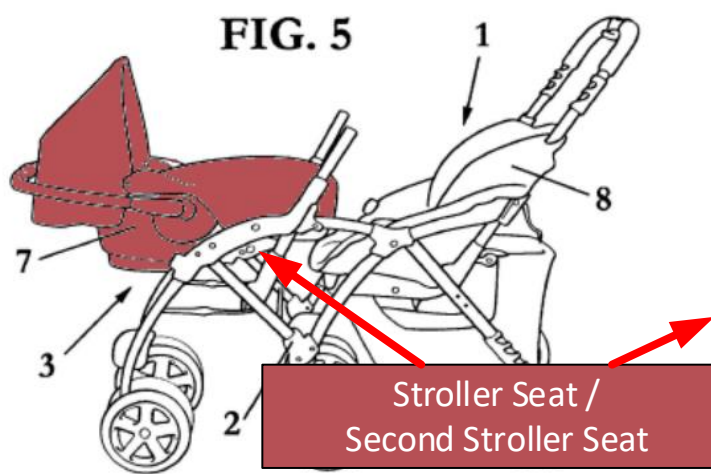
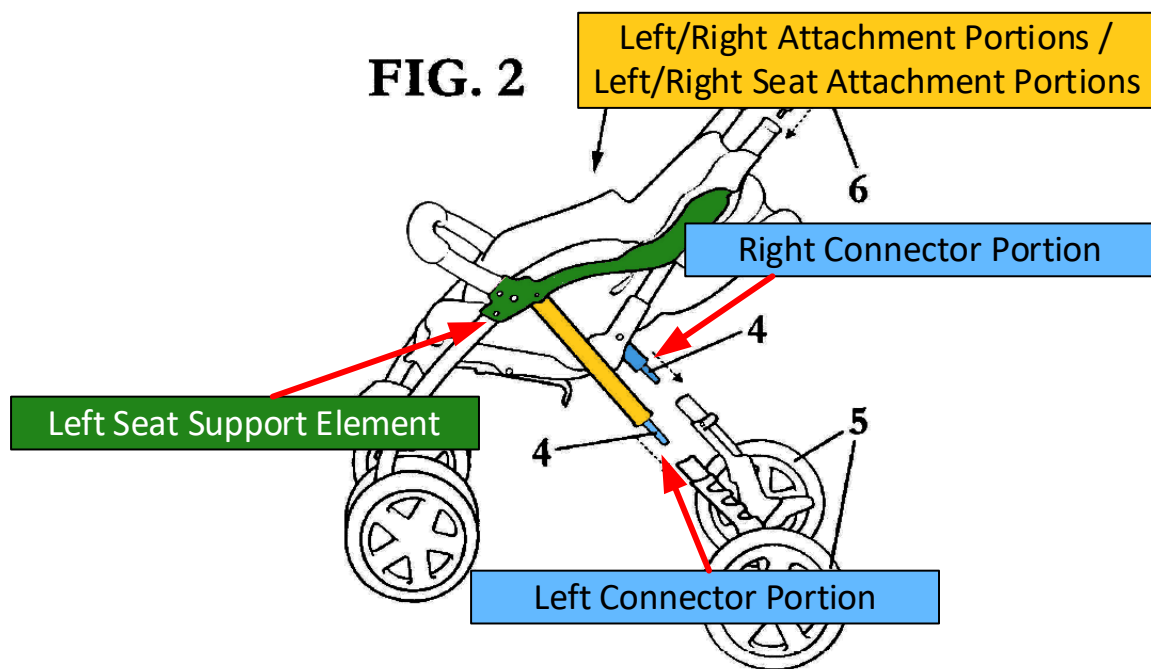


(EX1063, FIG. 5, 6.)

C. Claims 3-5 & 26-28

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* § IX(C). (EX1001 at ¶ 338.)





(EX1063, FIG. 2, 3, 5, 6.)

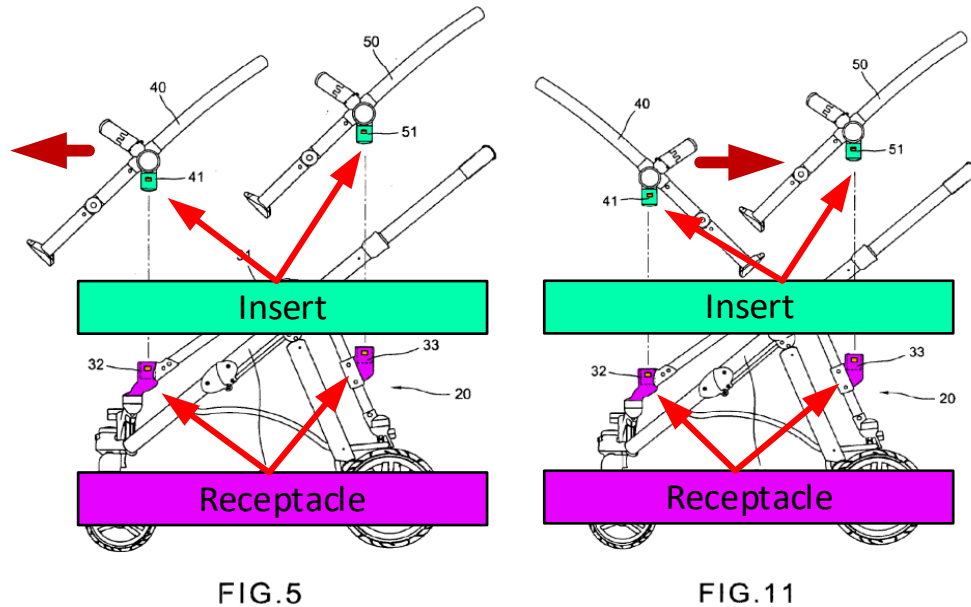
D. Independent Claim 9

As discussed *supra* § IX, 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; EX1001 at ¶ 339.) The inserts and receptacles permit the seat to face forward or backward. (EX1065, ¶¶ 5-8, 24, FIGS. 5 & 11; EX1001 at ¶ 339.)

To the extent that PO 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, ¶¶ 5-8, 24; EX1001 at ¶ 340.) 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. (EX1065, ¶¶ 5-6; EX1001 at ¶ 340.)

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. (EX1001 at ¶ 341.)



(EX1065, FIG. 5, 11.)

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* § IX(G). (EX1001 at ¶ 342.)

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; EX1001 at ¶ 343.)

Accordingly, it would have been obvious to POSITA that Stopp in view of Chen discloses the subject matter of claim 9. (EX1001 at ¶ 344.)

E. Claim 10

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* § IX(H). (EX1001 at ¶ 345.)

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 (stating that the seats may individually be faced forward or rearward); EX1001 at ¶ 346.) It would therefore would have been obvious to POSITA to face a seat pointing backwards. (EX1001 at ¶ 346.)

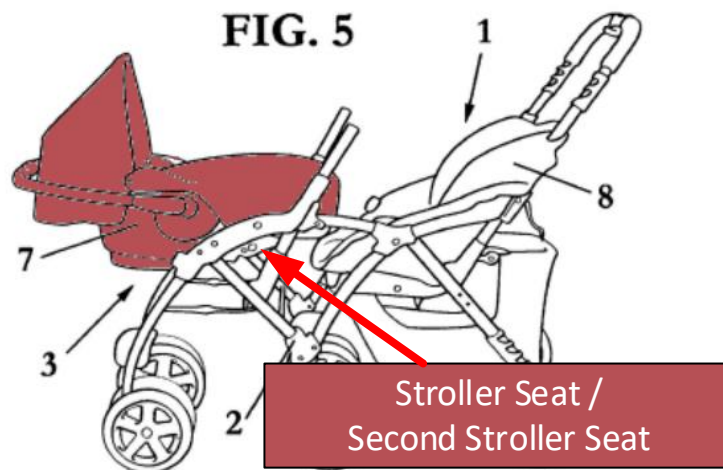
Accordingly, it would have been obvious to POSITA that Stopp in view of Chen discloses the subject matter of claim 10. (EX1001 at ¶ 347.)

F. Claim 11

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* § IX(I) (EX1001 at ¶ 348.)

Chen also discloses the second seat is a stroller seat. (EX1065 ¶¶ 2-9, 21-26; EX1001 at ¶ 349.) It would have been obvious to POSITA to use a stroller seat with a stroller. (EX1001 at ¶ 349.)

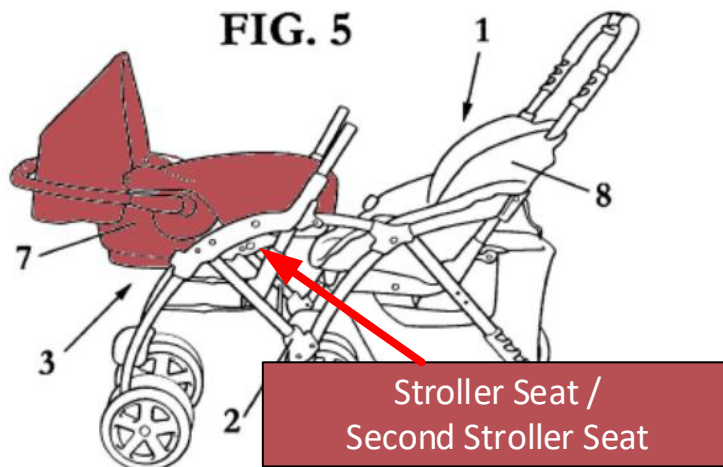
Accordingly, it would have been obvious to POSITA that Stopp in view of Chen discloses the subject matter of claim 11. (EX1001 at ¶ 349.)



(EX1063, FIG. 5.)

G. Claim 12

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* § IX(J). (EX1001 at ¶ 350.)



(EX1063, FIG. 5.)

H. Claim 13

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* § IX(K). (EX1001 at ¶ 351.)

I. Claim 14

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* § IX(L). (EX1001 at ¶ 352.)

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. Such structures are well-known to POSITA and would have been

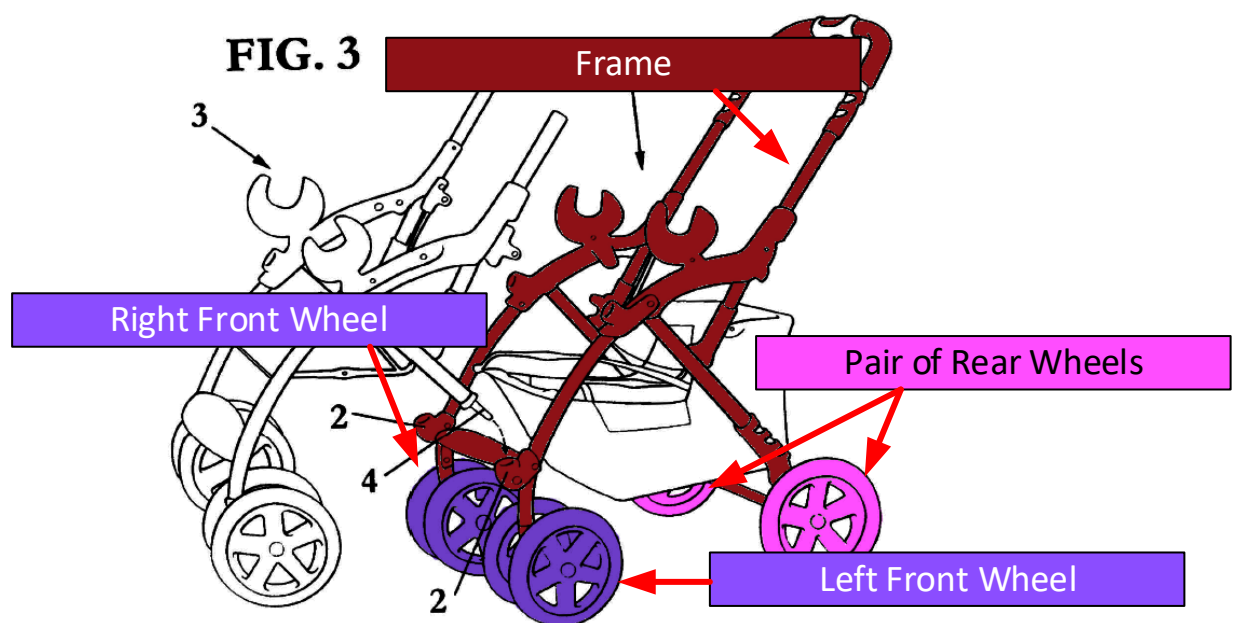
obvious to POSITA from the FIG.FIGS.. (EX1063, FIG. 5; EX1001 at ¶ 353.)

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. (EX1001 at ¶ 353.)

Accordingly, it would have been obvious to POSITA that Stopp in view of Chen discloses the subject matter of claim 14. (EX1001 at ¶ 354.)

J. Claim 15

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* § IX(M). (EX1001 at ¶ 355.)



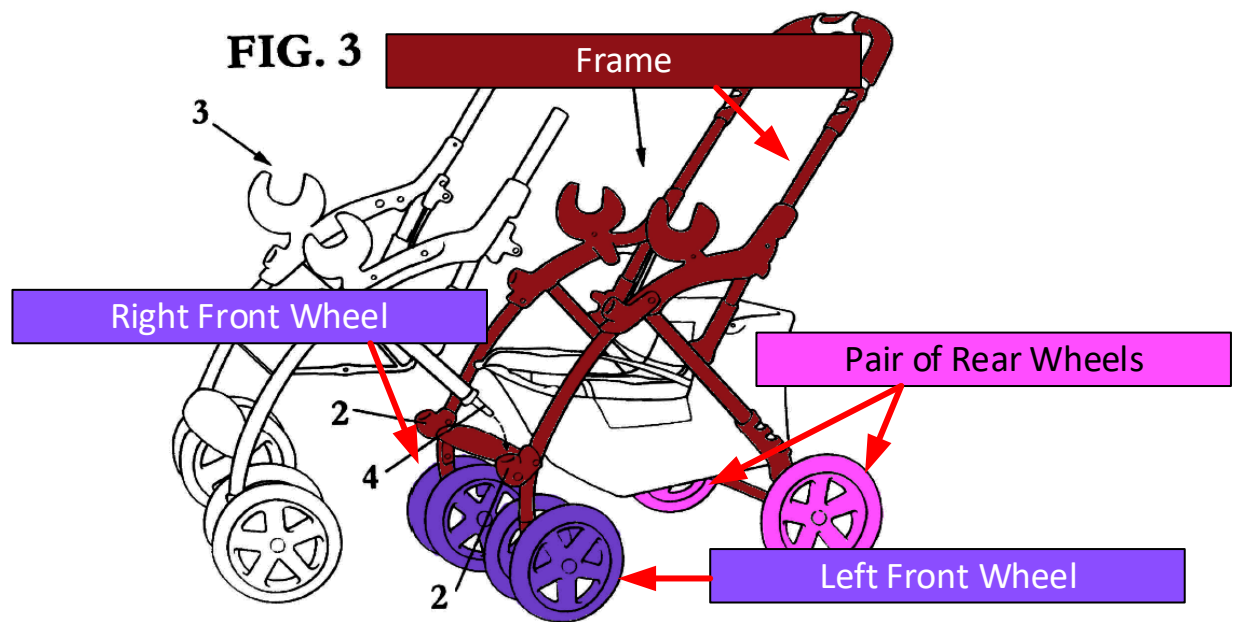
(EX1063, FIG. 3.)

K. Claim 16

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* § IX(N). (EX1001 at ¶ 356.)

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; EX1001 at ¶ 357.) This would have been evident to POSITA upon visual inspection of the FIG.FIGS. of Chen. (EX1001 at ¶ 357.)

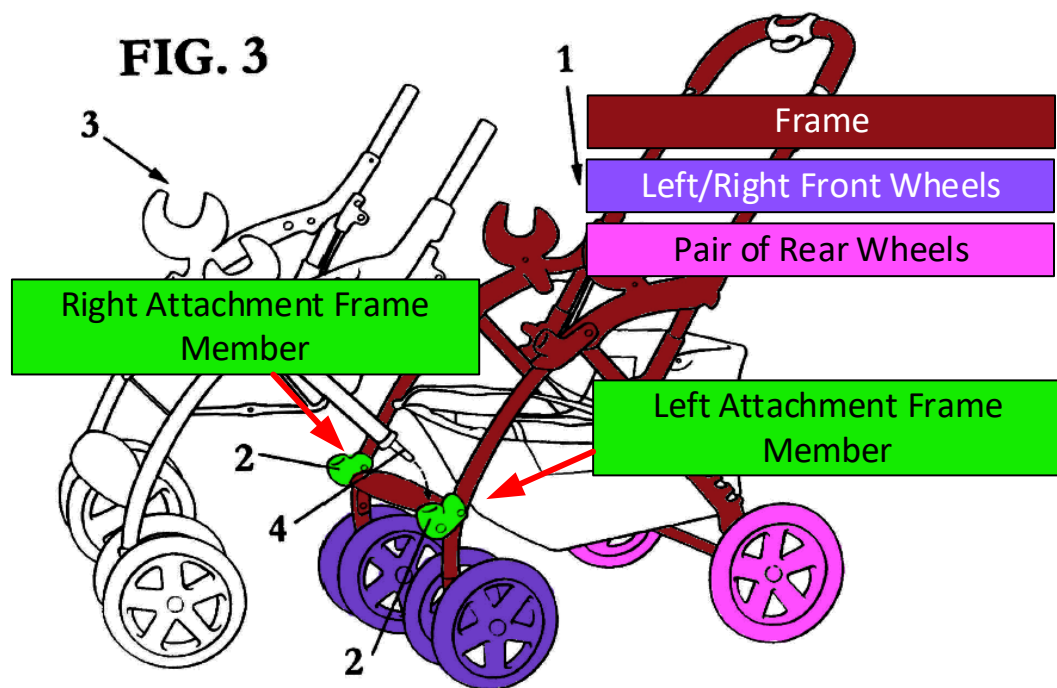
Accordingly, it would have been obvious to POSITA that Stopp in view of Chen discloses the subject matter of claim 16. (EX1001 at ¶ 358.)



(EX1063, FIG. 3.)

L. Claim 17

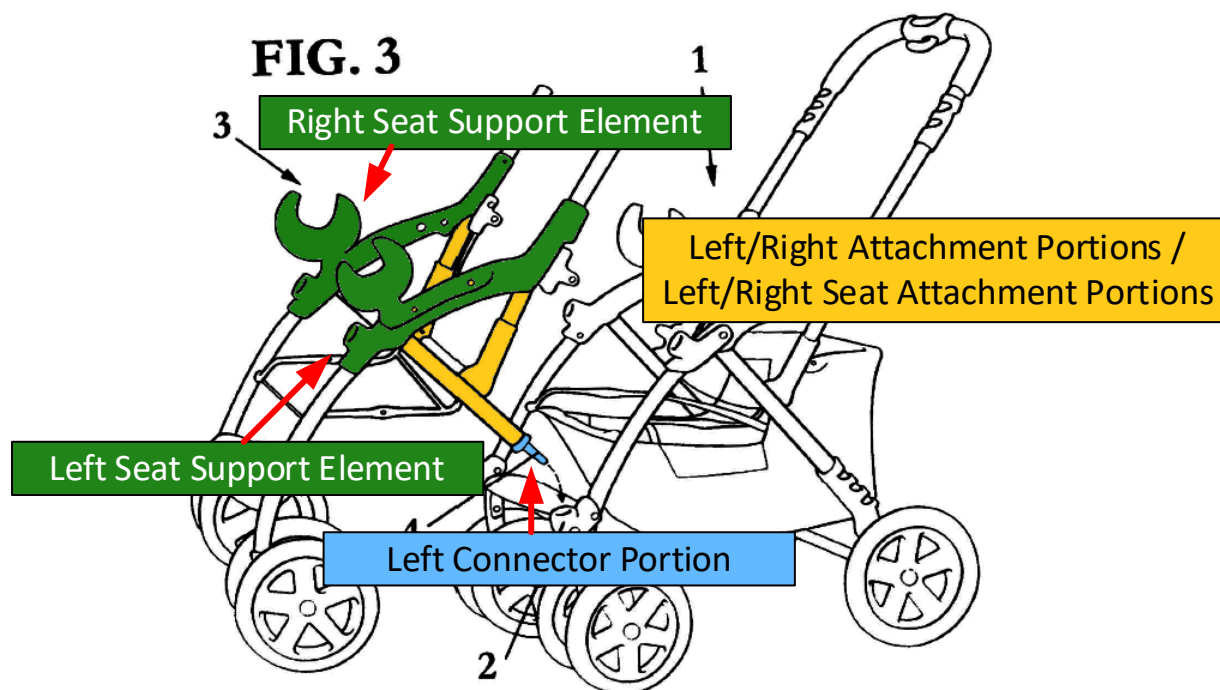
Stopp in view of Chen discloses or renders obvious the elements of claim 17 for the same reasons that Stopp disclosed or rendered obvious claim 17, as discussed *supra* § IX(O). (EX1001 at ¶ 359.)



(EX1063, FIG. 3.)

M. Claims 18-23

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* § IX(P). (EX1001 at ¶ 360.)



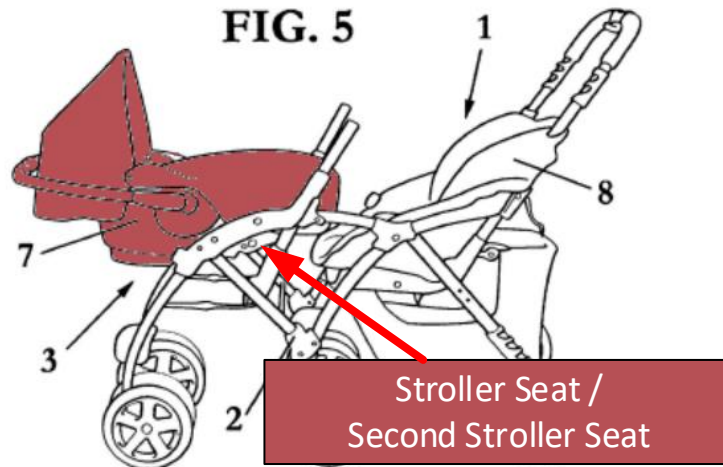
(EX1063, FIG. 3.)

N. Claim 29

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* § IX(Q). (EX1001 at ¶ 361.)

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; EX1001 at ¶ 362.)

Accordingly, it would have been obvious to POSITA that Stopp in view of Chen discloses the subject matter of claim 29. (EX1001 at ¶ 364.)



(EX1063, FIG. 5.)

O. Claim 30

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* § IX(R). (EX1001 at ¶ 365.)

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

A. Claim 13

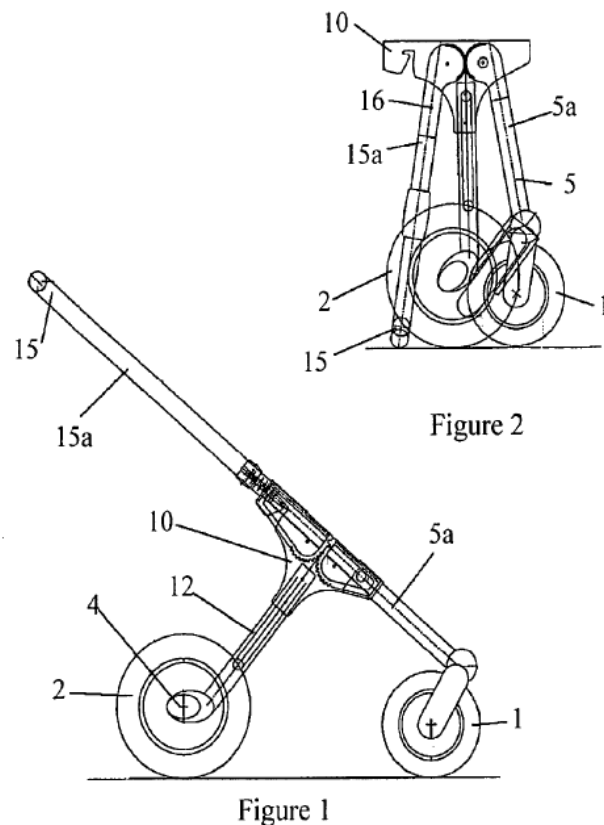
Stopp in view of Chen, Wun, and Lake discloses or renders obvious claim 13 for the same reasons that Stopp in view of Chen discloses or renders obvious the subject matter of claim 13, as discussed *supra* § X(K). (EX1001 at ¶ 366.)

To the extent that PO argues Stopp in view of Chen does not disclose a folding mechanism, Wun discloses a folding mechanism. (EX1060, ¶¶ 3, 35-39, FIG. 1, 2; EX1001 at ¶ 367.) 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. (EX1060, ¶¶ 3, 35-39, FIG. 1, 2; EX1001 at ¶ 367.) 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. (EX1060, ¶¶ 3, 35-39, FIG. 1, 2; EX1001 at ¶ 367.)

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. (EX1060, ¶¶ 3, 35-39, FIG. 1, 2; EX1001 at ¶ 368.)

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. (EX1001 at ¶ 369.)



(EX1060, FIG. 1, 2.)

A. Claim 14

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* § X(L). (EX1001 at ¶ 370.)

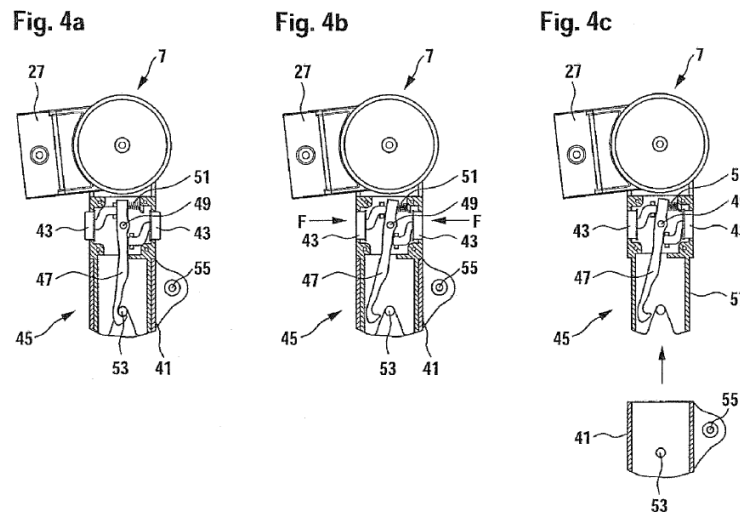
However, to the extent that the PO argues that Stopp in view of Chen does not disclose a releasable connection for the first seat including a button or a locking tab, Lake discloses a releasable connection including a button or a locking tab. (EX1061, ¶¶ 44, 46-51, FIG. 4(a)-(c); EX1001 at ¶ 371.)

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. (EX1061, ¶¶ 44, 46-51, FIG. 4(a)-(c); EX1001 at ¶ 372.) 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. (EX1061, ¶¶ 44, 46-51, FIG. 4(a)-(c); EX1001 at ¶ 372.) 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. (EX1001 at ¶ 372.)

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. (EX1001 at ¶ 373.)

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. (EX1001 at ¶ 374.)



(EX1061, FIG. 4a-3c.)

Dated: June 20, 2025

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e)(4), I hereby certify that on June 20, 2025, I caused a copy of the foregoing Petition for *Inter Partes* Review, and any supporting exhibits filed therewith, to be served via FedEx overnight delivery at the following correspondence address of record for the patent:

Mr. Daniel Warren
134811 - Eversheds Sutherland (US) LLP/NWL
999 Peachtree Street
Suite 2300
Atlanta, GA 30309

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Date: June 20, 2025

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