

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 IPR2025-01106

Patent 9,403,550

PETITION FOR *INTER PARTES* REVIEW

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LIST OF EXHIBITS

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

Exhibit No.	Description	Identifier
1023	Non-certified File History of U.S. Patent No. 11,878,729	
1024	Certified File History of U.S. Patent Publication No. 2023/0382447	
1025	Sewell, Samuel J. "The History of Children's and Invalids' Carriages." <i>Journal of the Royal Society of Arts</i> , vol. 71, no. 3694, 1923, pp. 716–728	
1026	U.S. Patent No. 405,600	Richardson
1027	U.S. Patent No. 510,355	Mann
1028	<i>Intentionally left blank</i>	
1029	U.S. Patent No. 4,191,397	Kassai
1030	U.S. Patent No. 6,513,827	Barenbrug
1031	Declaration of Hollie Schultz	
1032	Declaration of Greg Allen	
1033	U.S. Patent No. 7,641,216	Cone
1034	U.S. Patent No. 4,398,748	Duvignacq
1035	U.S. Patent Pub. No. 2008/0238042	Zhong
1036	<i>Intentionally left blank</i>	
1037	U.S. Patent No. 6,086,087	Yang
1038	Kolcraft Contours Options Tandem Stroller Instruction Sheet, EXA to Affidavit of Christopher Butler	
1039	French Patent 2,615,155 and Non-certified English Translation	Alain
1040	U.S. Patent No. 6,209,892	Schaaf
1041	EP 0980810	Gotting
1042	U.S. Design Patent 514,036	Fox
1043	Evenflo Take Me Too Manual – Double Stroller/Double Travel System (Oct. 2004)	
1044	U.S. Patent No. 6,045,145	Lan
1045	U.S. Patent No. 5,794,951	Corley
1046	Comparison of First Non-Provisional Specification and 305 '305 CIP specification	
1047	U.S. Patent No. 8,882,134	Rolicki
1048	U.S. Design Patent No. D593,459	Liao
1049	U.S. Patent Pub. No. 2006/0071451	Cheng

Exhibit No.	Description	Identifier
1050	U.S. Patent No. 6,923,467	Hsia '467
1051	Taiwanese Design Patent No. D129880 and Certified English Translation	UPD
1052	U.S. App. No. 29/324,044 Non-certified File History	
1053	CN2778636Y with Certified English Translation	Feng
1054	U.S. Patent Pub. No. 2003/0075902	Hsia '902
1055	U.S. Patent Pub. No. 2003/0075902	
1057	<i>Intentionally Left Blank</i>	
1058	<i>Intentionally Left Blank</i>	
1059	U.S. Patent 6,286,844	Cone
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 LISTING

1(Preamble)	A stroller, comprising:
1(a)	a stroller frame;
1(b)	a plurality of wheels comprising a plurality of front wheels and a plurality of back wheels:
1(c)	a first seat coupled to the stroller frame at a first vertical position of the stroller frame closer to a handle of the stroller and conFIG.d to hold a first child in the stroller;
1(d)	a second seat attachment coupled to the stroller frame at a second vertical position substantially below the first vertical position and closer to the front wheels and comprising:
1(e)	a left seat support element, wherein the left seat support element comprises:
1(f)	a first connector portion releasably connected to the stroller frame closer to a left front wheel and a left seat connector releasably connecting a second seat in either a forward or backward position; and
1(g)	a right seat support element, wherein the right seat support element comprises:
1(h)	a second connector portion releasably connected to the stroller frame closer to a right front wheel and a right seat connector releasably connecting the second seat in either a forward or backward position between the left and right seat connectors; and
1(i)	the second seat releasably connected to the left seat connector and the right seat connector and conFIG.d to hold a second child in the stroller while the first seat holds the first child.
2	The stroller of claim 1, wherein the second seat is a baby seat, a car seat, a stroller seat, a bassinet, a baby carrier, or a pram.
3	The stroller of claim 1, wherein each of the left and right seat support elements has a first end and a second end.
4	The stroller of claim 3, wherein the first end comprises the connector portion and is releasably connected to the stroller frame.
5	The stroller of claim 4, wherein the second end comprises the seat connector and is releasably connected to the second seat.
6	The stroller of claim 1, wherein both the first connector portion and the second connector portion releasably connect to the stroller by at least one of buttons, snaps, friction fittings, interference fits, threaded connections, locking tabs, or keyed connections.

7(pre)	A stroller, comprising:
7(a)	a stroller frame;
7(b)	a plurality of wheels comprising a plurality of front wheels and a plurality of back wheels;
7(c)	a first seat coupled to the stroller frame and disposed along a first vertical position of the stroller frame closer to a handle of the stroller, the first seat configured to hold a first child in the stroller;
7(d)	a second seat attachment coupled to the stroller frame closer to the front wheels and comprising:
7(e)	a left seat support element, wherein the left seat support element comprises:
7(f)	a first connector portion releasably connected to the stroller frame closer to a left front wheel and a left seat connector releasably connecting a second seat in either a forward or backward position; and
7(g)	a right seat support element, wherein the right seat support element comprises:
7(h)	a second connector portion releasably connected to the stroller frame closer to a right front wheel and a right seat connector releasably connecting the second seat in either a forward or backward position between the left and right seat connectors; and
7(i)	the second seat releasably connected to the left seat connector and the right seat connector and positioned at a second vertical position substantially below the first vertical position of the first seat,
7(j)	the second seat configured to hold a second child in the stroller while the first seat holds the first child.

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*,
IPR2025-01105.

Additional petitions for review of patents related to the ‘550 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:

Lead Counsel	Back-up Counsel
Craig R. Smith (Reg. No. 45,113) Lando & Anastasi LLP 60 State Street, Ste. 23, Boston, MA 02109 csmith@lalaw.com 617-395-7081	Kevin M. Eckert (Reg. No. 80,096) Lando & Anastasi LLP 60 State Street, Ste. 23, Boston, MA 02109 keckert@lalaw.com 617-395-7011 Joseph W. Staley (Reg. No. 60,732) Perilla Knox & Hildebrandt LLP 5871 Glenridge Drive Suite 350 Atlanta, GA 30328 j.staley@pkhip.com (770) 927-7802 Robert D. Gravois Reg. No. 67,224 Perilla Knox & Hildebrandt LLP 1200 N Federal Hwy Suite 300 Boca Raton, FL 33432

	r.gravois@pkhip.com (770) 927-7802 Scott P. Amy (<i>pro hac vice</i> forthcoming) Perilla Knox & Hildebrandt LLP 5871 Glenridge Drive Suite 350 Atlanta, GA 30328 s.amy@pkhip.com (770) 927-7802
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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:

Isabel Duncan Lando & Anastasi LLP 60 State Street, Ste. 23, Boston, MA 02109 iDuncan@lalaw.com 617-395-7010
mockingbirdlitigation@pkhip.com
emailservice@lalaw.com

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 12450 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 1-7 (“Challenged Claims”) of U.S. Patent No. 9,403,550 (the “550 patent”) (EX1004) owned by Baby Jogger, LLC (“PO”).

II. U.S. PATENT NO. 9,403,550 PATENT AND PROSECUTION HISTORY

A. Description of the ‘550 Patent

The ‘550 Patent was filed on January 15, 2015, claiming priority back to December 4, 2008. The ‘550 Patent issued on August 2, 2016. As a result, the earliest possible priority date is December 4, 2008.

The alleged invention of the ‘550 Patent is a seat attachment for a stroller that permits conversion of a single-seat stroller into a double-seat stroller. (EX1004, ‘550 Patent, col. 4:8-9 (“this invention relates to an accessory, attachment, or conversion kit for a stroller.”) (cleaned up).)

The ‘550 Patent discloses a stroller. (*Id.*, 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 releasable. (*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. (EX. 1001, ¶¶ 110-118.)

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

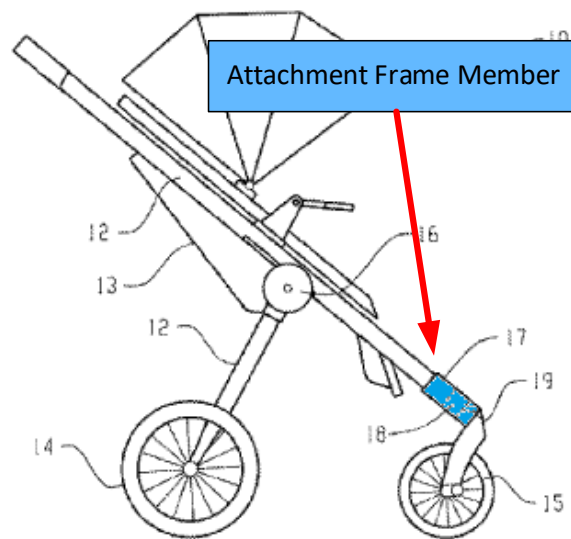


Fig. 1

(EX1005, FIG. 1.)

The '550 Patent discloses a seat attachment (20) for the stroller. (*Id.*, FIG. 2.)

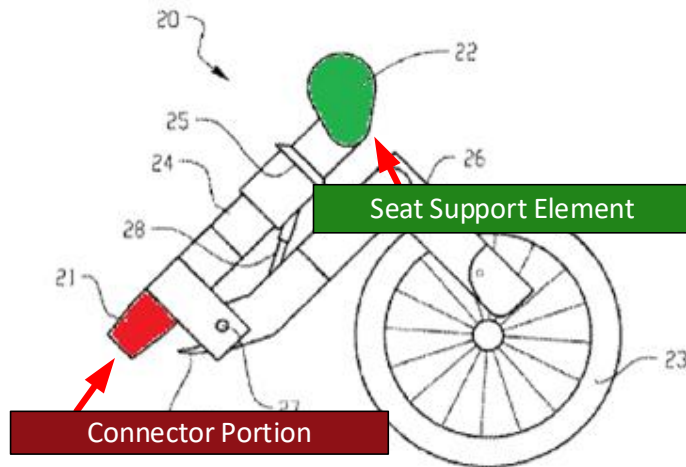


Fig. 2

(*Id.*, FIG. 2.)

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

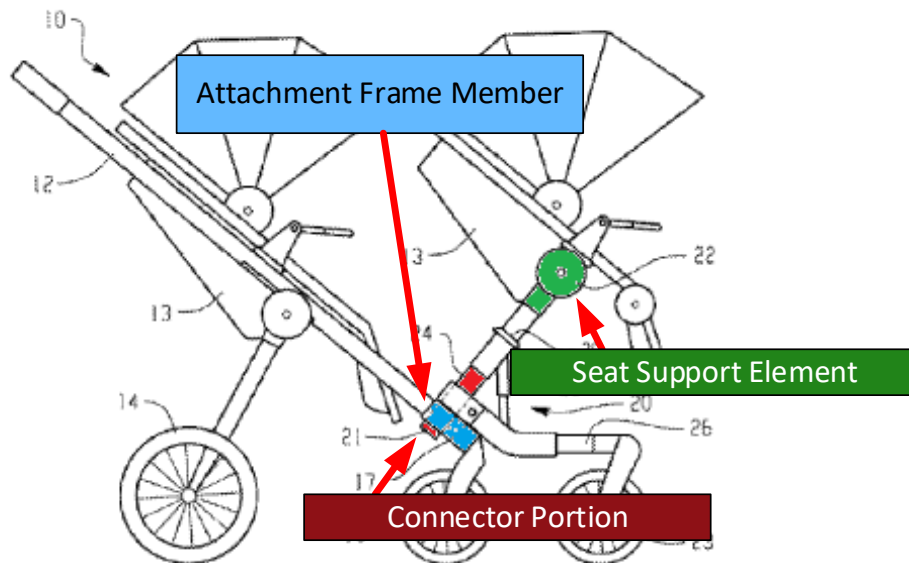


Fig. 3

(*Id.*, 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, or referred to as seat connectors, in the Specification or elsewhere in the patent family) to which a seat can releasably 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.)

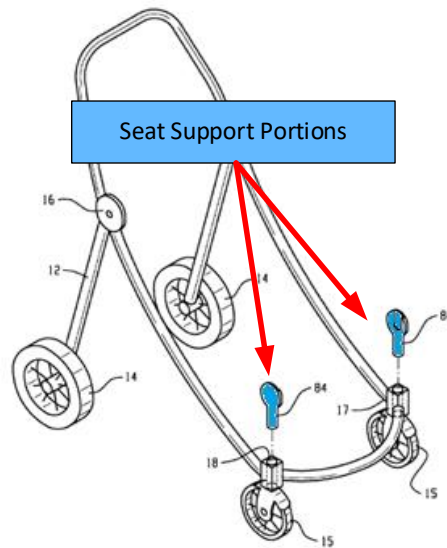


Fig. 10

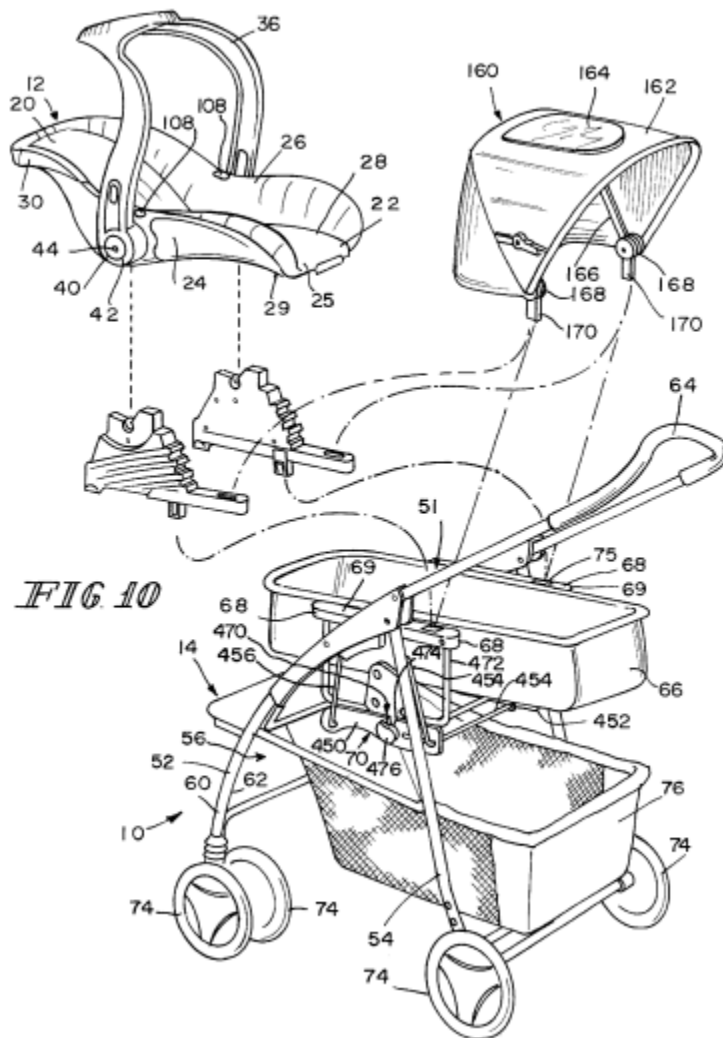
In short, the ‘550 Patent discloses a seat attachment (20) that plugs into the frame of a stroller (10) to permit an additional seat to be added to the stroller, the additional seat being able to face either forward or backward. (EX1001, Declaration, ¶¶ 110-118.)

B. Summary of the Prosecution History of the ‘550 Patent

The application underlying the ‘550 Patent was rejected on 4/23/15. The Office issued a 102 rejection in view of US 7,377,536 (EX1069) (“Li”). The Examiner found that Li disclosed each claim of the application. (EX1016, 53-56.)

In response, the PO submitted amendments that did not change the substance of the claims, but instead changed the names used in the claims to refer to certain parts, and changed “releasably” to “releasably.” (*Id.*, 46-47.) The PO argued that the special definition of “releasably connected” provided in the specification should be applied and demonstrated the allowability of the claims. (*Id.*) In response, the Examiner issued a final rejection combining Li with Cone. (*Id.*, 40-44.) Cone discloses an attachment that can be attached to a stroller to support a seat, as shown in FIG. 10 of Cone. (EX1059, FIG. 10.)

FIG. 10 of Cone



In an AFCP request made following the second rejection, the PO amended the claims to add the stroller frame, wheels, and a first seat, while defining the seat support elements as part of a second seat attachment. (EX1016, 38-42.) The PO also added a second seat releasably connected to the seat connectors and configured to hold a child while the first seat holds a first child. (*Id.*)

The Examiner indicated the amendments raised new issues, and noted that U.S. 7,475,900 (Cheng) could be substituted for Li and would maintain the rejection. (*Id.*, 30.)

FIG. 4 of Cheng

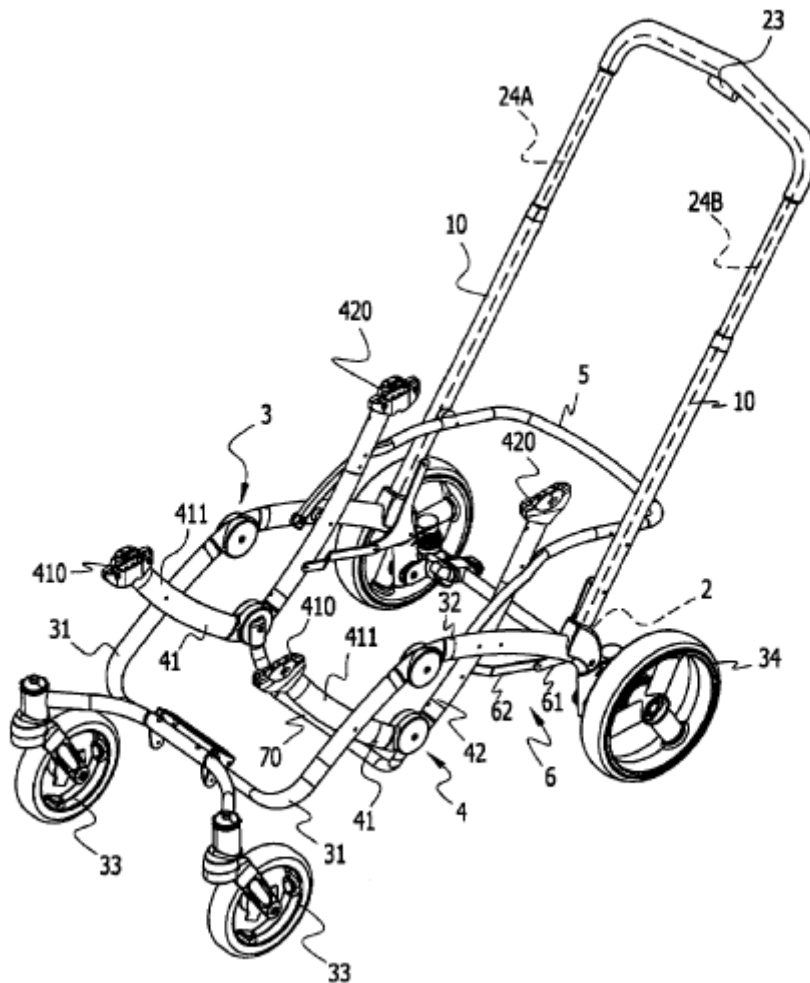


FIG. 4

Then, in a request for continued examination, the PO argued that Cheng did not disclose that the second seat (front seat) was coupled to the frame at a substantially lower position than the first seat (rear seat). (*Id.*, 16, 23.)

The Examiner never responded to this argument. Instead, the parties apparently reached agreement on an Examiner's Amendment, which was entered and allowed. (*Id.*, 9-13.) The Examiner's amendment added various language, including the plurality of front wheel and the plurality of back wheels, and the "closer to the hand" and "closer to the [left/right] front wheel" language in the final claims. (*Id.*) The Examiner stated that the amended language was not disclosed by the prior art, but did not explain why. (*Id.*)

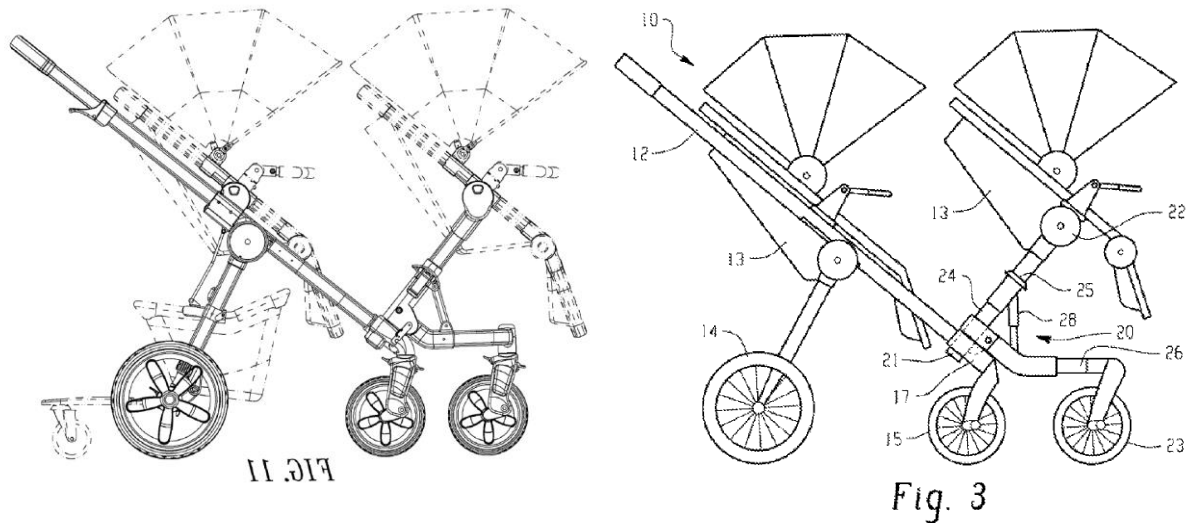
The issue fee was then paid and the '550 Patent issued.

III. SUMMARY OF THE PRIOR ART TO THE '550 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 '550 Patent.

As demonstrated below in Ground 1, Liao renders obvious all claims of the '550 Patent. In fact, a comparison of FIG. 11 of Liao and FIG. 3 of the '550 Patent, shown below, is striking. (EX1001, Declaration, ¶¶ 120-122, 125-127.)



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

Although Liao was not considered by the Examiner during prosecution of the '550 Patent, the Patent Office has repeatedly relied on Liao to reject claims in related applications claiming priority to the '550 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, 125-127.)

In the prosecution of U.S. Patent 12,275,449, ultimately a Continuation-in-Part of the application underlying the '550 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 releasably attached to the stroller frame, one

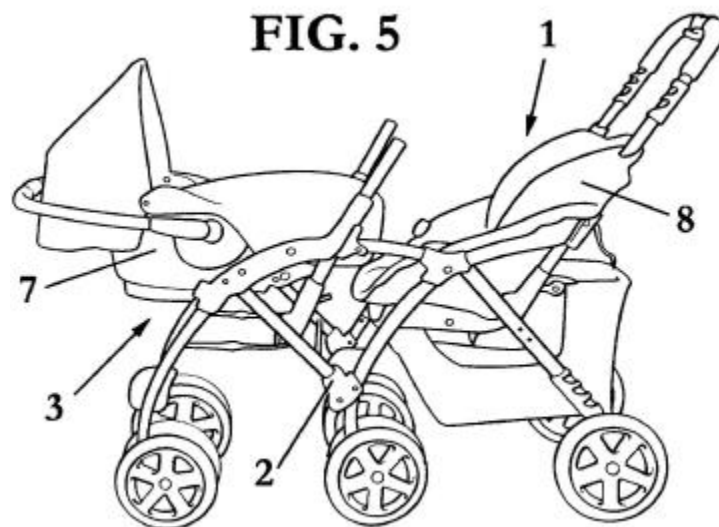
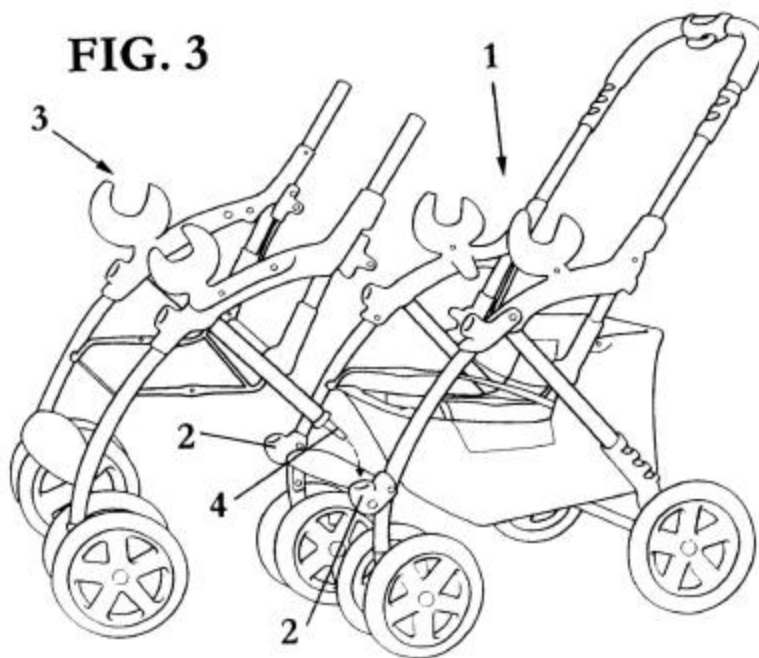
or more seat attachment portions releasably attached to the stroller frame, a second seat releasably attached to the one or more seat attachment portions, and so forth. (EX1068, 950-53.) The Examiner found that at least one of the first and second seats was configured to face forward or backward, and 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 Pub. ES 2253093 to Stopp

Stopp is a publication of a Spanish patent application. (EX1063, 1.)¹ Stopp constitutes prior art to the '550 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; EX1001, ¶ 128.) 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.

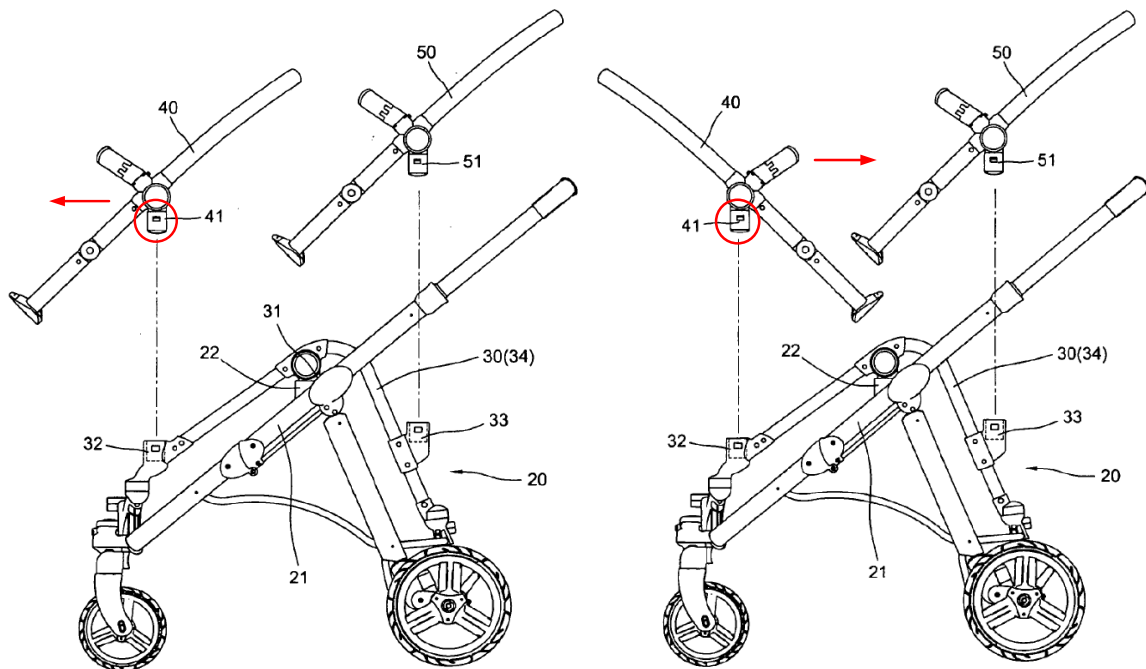
¹ Citations here are to the certified translation (EX1063) of Stopp.



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 seat inserts (41, 51) and receptacles (32, 33) that support seats being connected facing forward or backward. (Id., ¶¶ 6, 24, 26; EX1001 ¶ 129.)



D. U.S. Patent No. 6,585,284 to Sweeney

Sweeney was filed on September 21, 2001, and issued on July 1, 2004. It is therefore prior art under pre-AIA 35 U.S.C. § 102(a), (b). (*Lynk Labs, Inc. v. Samsung Elecs. Co., Ltd.*, 125 F.4th 1120, 1126-27 (Fed. Cir. 2025).)

Sweeney discloses a double stroller with a height-adjustable rear seat. (EX1067, Sweeney, col. 2:27-37, col. 4:50-67, col. 5:1-8.) The height adjustable rear seat may be adjusted to different positions above the front seat (or in line with

the front seat), to beneficially provide a view for the passenger in the rear seat. (*Id.*; EX1001 ¶ 130.)

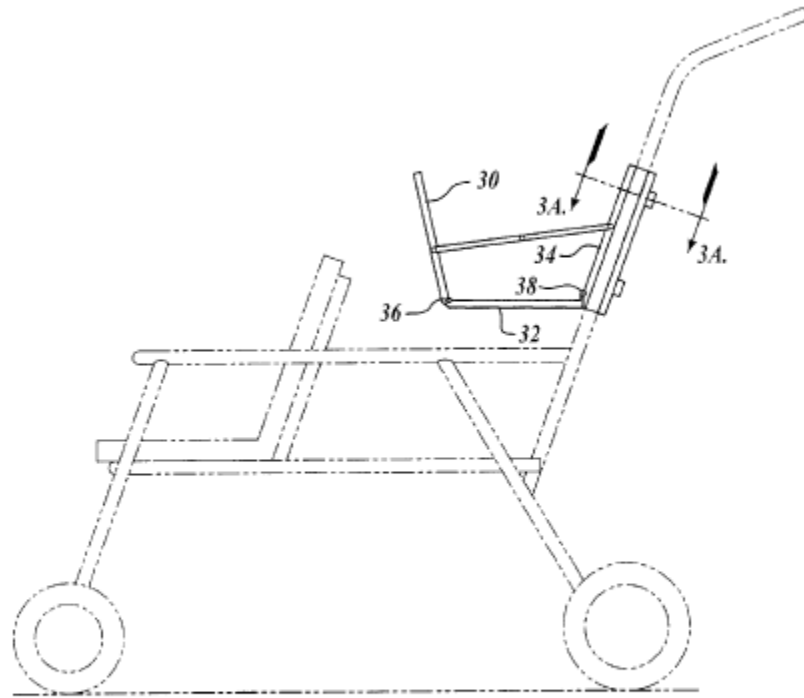


Fig. 2A.

IV. LEVEL OF 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 '550 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 Basis	Relief Requested
Ground 1	1-6	Liao	35 U.S.C. § 103	Invalidation of Claims
Ground 2	1-7	Liao in view of Chen and Sweeney	35 U.S.C. § 103	Invalidation of Claims
Ground 3	1-6	Stopp	35 U.S.C. § 103	Invalidation of Claims
Ground 4	1-7	Stopp in view of Chen and Sweeney	35 U.S.C. § 103	Invalidation of Claims

B. Asserted Prior Art

The following references are relied on herein, and are prior art as explained *supra* § III(A)-(D):

Serial Number	Name	Effective Filing Date
ES 2253093	Stopp	Aug. 6, 2004

US 2010/0013281	Chen	July 16, 2008
US D593459	Liao	September 5, 2008
US 6,585,284	Sweeney	September 21, 2001

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.)

Additionally, the ’550 Patent states:

As used herein, “releasably connected” or “releasably attached” means the connection is not a permanent connection and that the connection is capable of being connected and disconnected by the user of the stroller 10 without requiring special tools or special skills.

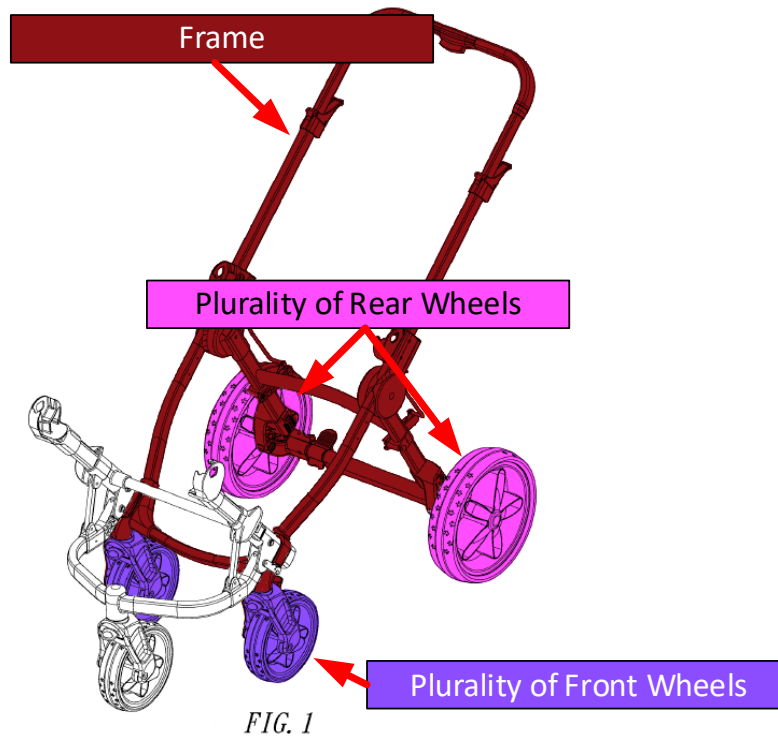
(EX1005, 4:53-58; *ParkerVision, Inc. v. Vidal*, 88 F.4th 969, 976-77 (Fed. Cir. 2023) (“as used herein” is definitional). This Petition applies that definition for “releasably connected.”)

VII. GROUND 1 - LIAO

A. Claim 1

a) [1(Pre)]-[1(b)]

FIG.s 1, 5, and 11 of Liao illustrate a stroller and a second seat attachment (for a front seat) for the stroller. (EX1001 at ¶ 132; EX1048, FIGS. 1, 5, 11.) FIG.s 8-13 show releasable seats attached to both the stroller and the seat attachment. (EX1001 at ¶ 132; EX1048, FIGS. 1, 5, 8-13.) FIG. 1 shows that the stroller has a frame, two rear wheels, and two front wheels. (EX1001 at ¶ 132; EX1048, FIGS. 1, 5, 8-13.)

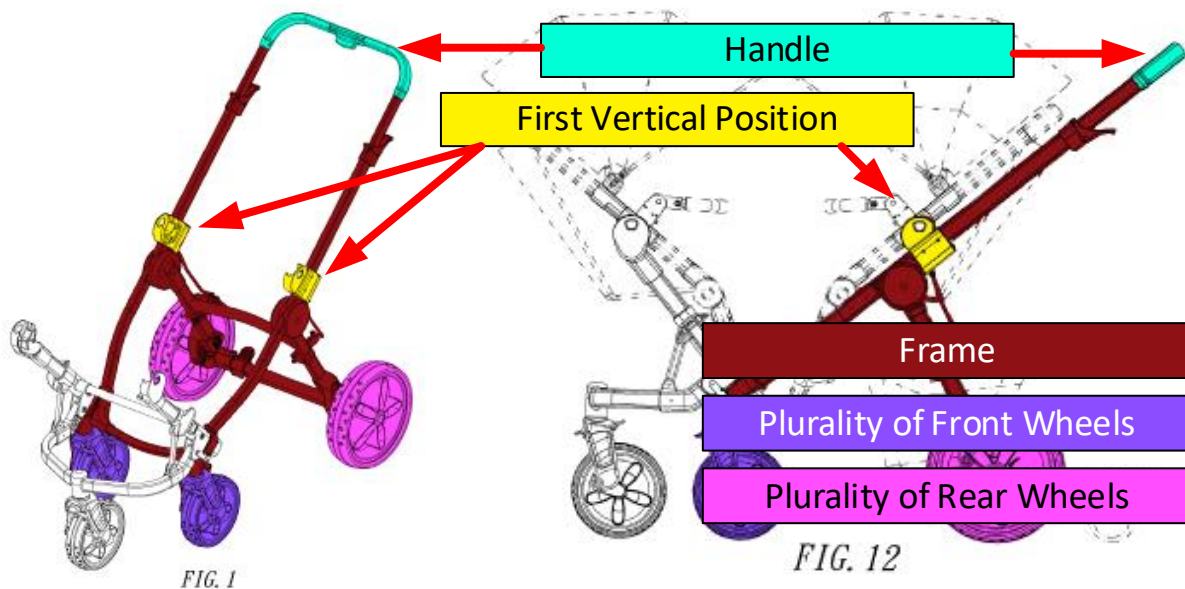


(EX1048, FIG. 1.)

Accordingly, Liao discloses limitations [1(Pre)]-[1(b)]. (EX1001 at ¶ 133.)

b) [1(c)]

As shown in FIG.s 1 and 12, the stroller of Liao includes a first seat (the rear seat) that is coupled to the stroller frame at a first vertical position closer to the handle of the stroller. (EX1001 at ¶ 134; EX1048, FIGS. 1, 12.) The first seat of Liao is conFIG.d to hold a first child in the stroller. (EX1001 at ¶ 134; EX1048, FIGS. 1, 12.)



(Id.)

Accordingly, Liao discloses limitation [1(c)]. (EX1001 at ¶ 136.)

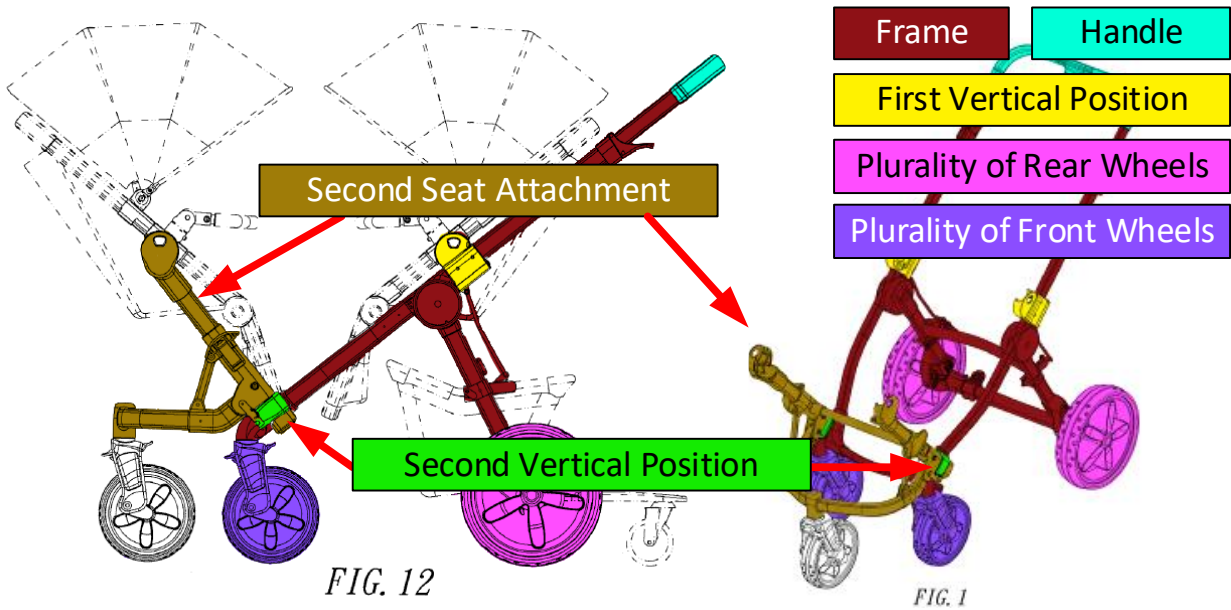
c) [1(d)]

FIG.s 1, 5 & 11 of Liao illustrate a second seat attachment for a stroller. (EX1001 at ¶ 137; EX1048, FIGS. 1, 5, 11.) FIG.s 8-13 show releasable seats attached to the second seat attachment. (EX1001 at ¶ 137; EX1048, FIGS. 1, 5, 8-13.) Therefore, FIG.s 1, 5, 11, and 8-13 illustrate that the second (front) seat of

Liao is releasable from the second seat attachment. (EX1001 at ¶ 137; EX1048, FIGS. 1, 5, 8-13.)

FIG.s 1 & 12 further show how attachment frame members (located at the second vertical position) wrap around the connector portions of the second seat attachment. (EX1001 at ¶ 138; EX1048, FIGS. 1, 4, 5.) FIG. 5 illustrates a latch that also couples the second seat attachment to the stroller frame. (EX1001 at ¶ 138; EX1048, FIGS. 1, 4, 5.) The position where the latch and attachment frame members connect to the second seat attachment is the second vertical position. (EX1001 at ¶ 138; EX1048, FIGS. 1, 4, 5.)

As FIG.s 1 and 12 illustrate, the second vertical position is substantially lower than the first vertical position. (EX1001 at ¶ 139; EX1048, FIGS. 1, 4, 5.) Furthermore, FIG.s 1 & 12 also illustrate that the second vertical position is closer to front wheels than to the handle, and closer to the front wheels than the first vertical position. (EX1001 at ¶ 139; EX1048, FIGS. 1, 4, 5.)



(EX1048, FIGS. 1, 12.)

Accordingly, Liao discloses limitation [1(d)]. (EX1001 at ¶ 140.)

d) [1(e)]-[1(f)]

Liao discloses separate left and right seat support elements releasably 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. (EX1001 at ¶ 142; EX1048, FIG. 1.)

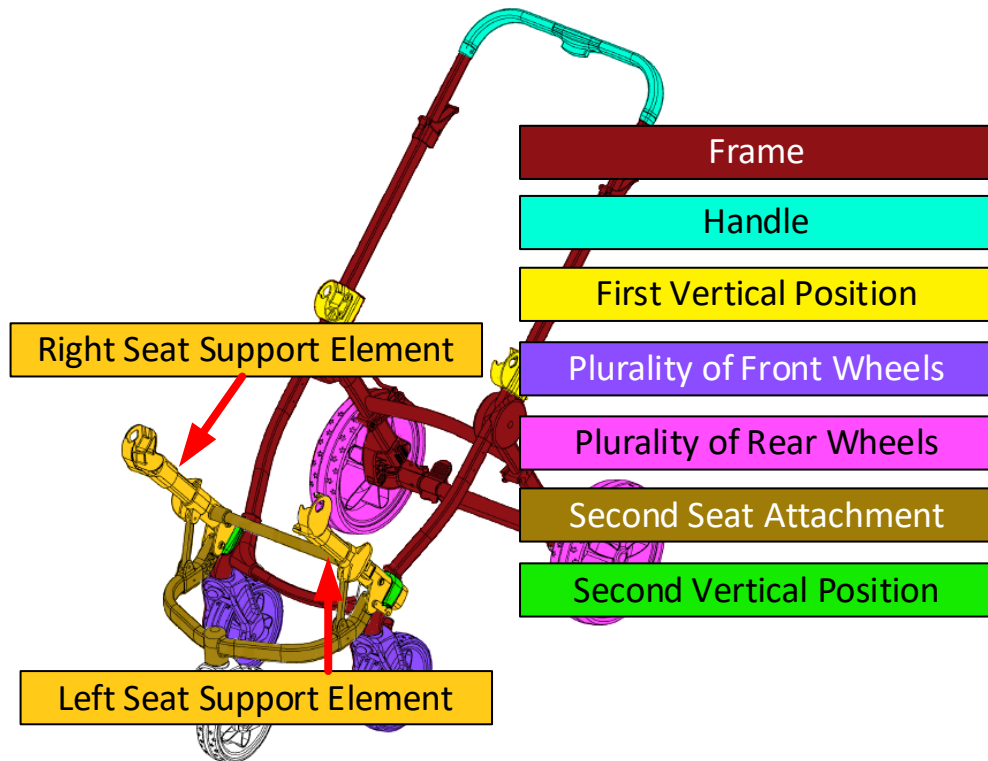


FIG. 1

(EX1048, FIG. 1.)

Liao discloses that each seat support element comprises a connector portion that releasably connects to the stroller frame, and a respective (left/right) seat connector that releasably connects a second stroller seat in both forward and backward positions. (EX1001 at ¶ 143; EX1048, FIG. 1, 10, 11.)

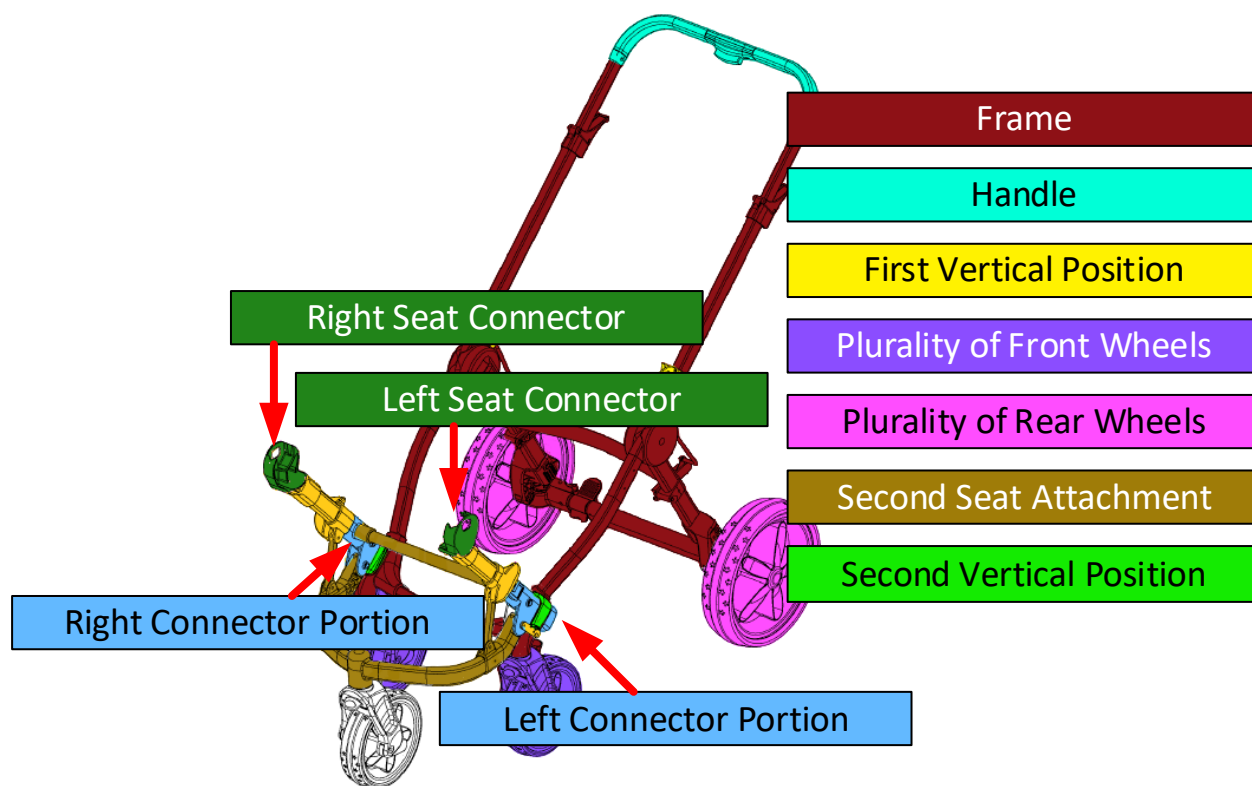


FIG. 1

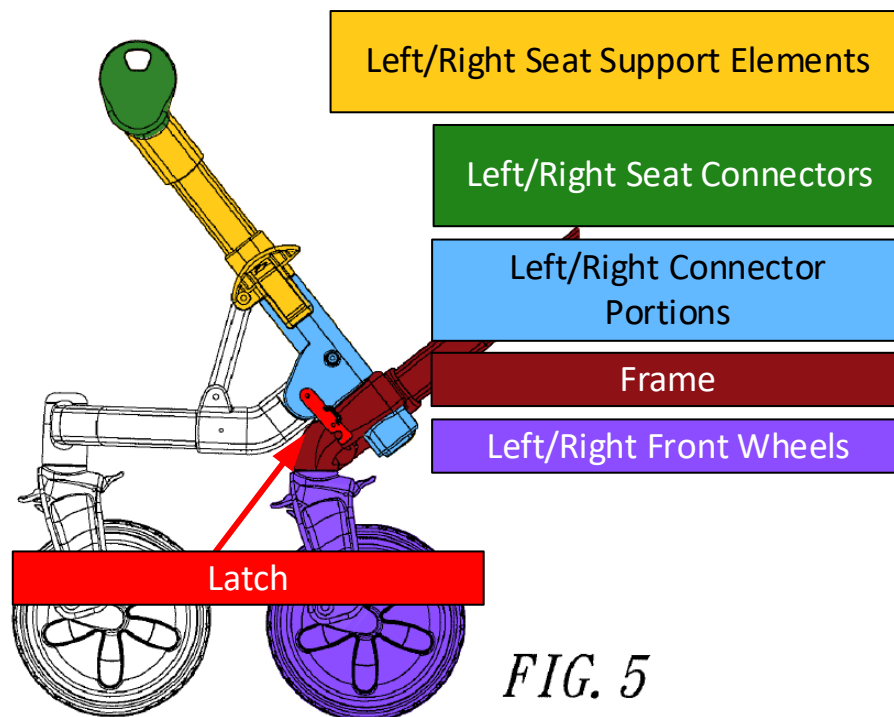
(EX1048, FIG. 1.)

The respective connector portions insert into respective slots at the second vertical position, and are latched to the frame by a latch (labeled below). (EX1001 at ¶ 144; EX1048, FIG. 1, 5.) The latch is a mechanism that allows the connector portion to be easily connected to and disconnected from the stroller without the use of special tools or skills; a caregiver can simply use his or her fingers to rotate the latch into engaged or disengaged positions. (*Id.*) A latch would not be present if the connector was permanently connected to the stroller frame. (*Id.*) FIGS. 1 and 12 also illustrate that the left seat connector portion is closer to the left front wheel

than to the right front wheel, the handle, the first vertical position, the seat connector, and so forth. (EX1001 at ¶ 144; EX1048, FIG. 1, 12.)

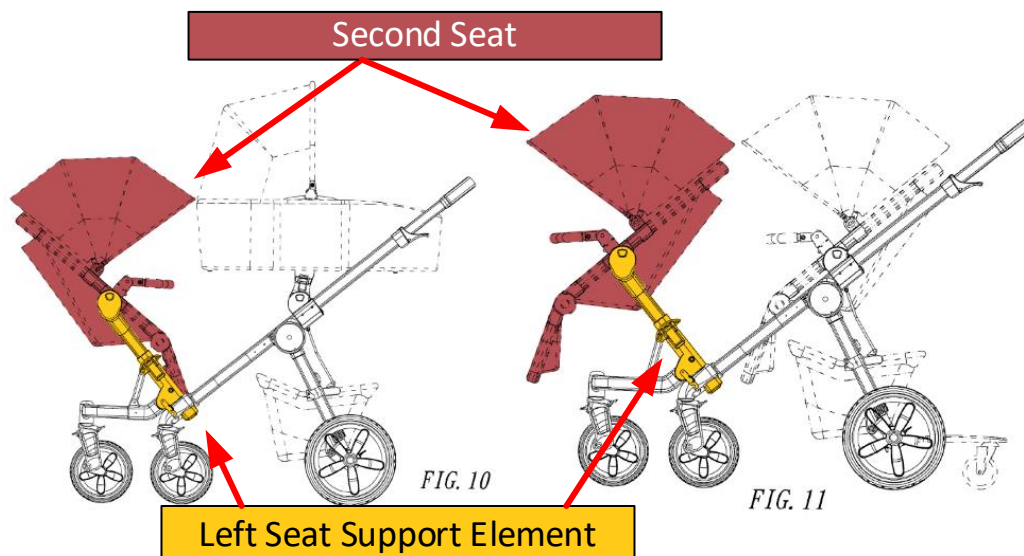
The seat connectors are the tops of the attachment portions, engageable, as shown in FIGS. 10 and 11, to a seat. (EX1001 at ¶ 145; EX1048, FIG. 1, 10-12.)

FIGS. 4 and 5 also show the seat connectors and connector portions; FIGS. 10 and 11 show that the second stroller seat (front seat) may be connected in either forward facing or rearward facing configurations. (EX1001 at ¶ 145; EX1048, FIG. 1, 4, 5, 10-12.)



(EX1048, FIG. 5.)

Liao's FIG.s show different types of seats being connected to the seat support elements, which a POSITA would have understood to mean that the seats are releasable and that various types of seats can be used with the frame at various times. (EX1001 at ¶ 147; EX1048, FIG. 8-13.) Additionally, a POSITA would have recognized that the coupling mechanism between the seat and the seat support elements is a conventional connector designed to allow the seat to be easily removed and connected without the use of special skills or tools. (EX1001 at ¶ 147; EX1048, FIG. 10-11.) Accordingly, the seat connectors "releasably connect[]" a second seat in either a forward or backward position. (*Id.*)



(EX1048, FIG. 10, 11.)

If PO argues that Liao's connector portions do not "releasably connect[]" to the stroller frame or that the seat connectors do not "releasably connect[]" the second seat, such features would have been obvious in view of Liao. A POSITA

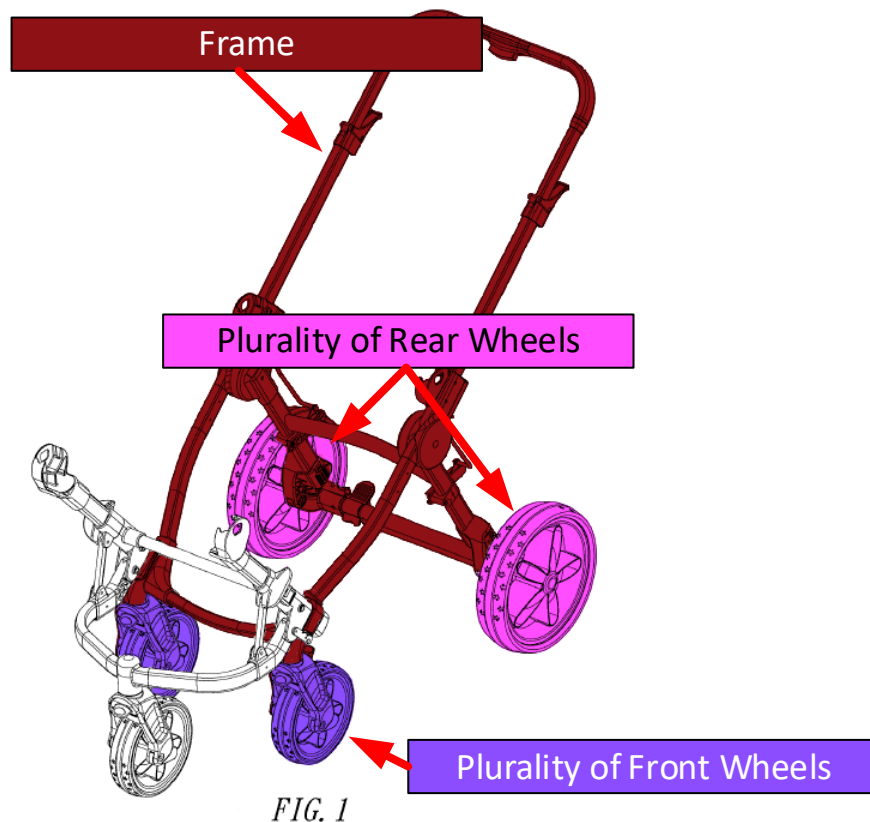
would have known that it would have been desirable to have the connector portions releasably from the frame and the second seat releasably from the seat connectors because it would facilitate transportation and storage of the stroller system.

(EX1001 ¶ 147.) Additionally, a POSITA would have known that it was desirable to make these components able to connect or disconnect without the use of special tools or skills because it is easier, simpler, and more convenient for the caregiver to make these components releasably without special tools or skills. (*Id.*) A POSITA would have reasonably expected success because these modifications would have been straight forward, used conventional stroller components, and well-within POSITA's skill. (*Id.*)

Accordingly, Liao discloses or renders obvious the limitations [1(e)]-[1(f)]. (EX1001 at ¶ 148.)

e) [1(g)]-[1(h)]

Liao's stroller system has left-right symmetry. (EX1001 at ¶ 150; EX1048, FIGS. 1-7.) As shown in the FIG.s below, the right side of Liao's seat attachment mirrors all the features discussed above that the left side possesses. (EX1001 at ¶ 150; EX1048, FIGS. 1-7.) Therefore, Liao discloses or, alternatively, renders obvious the right-sided features recited in [1(g)]-[1(h)], for the same reasons discussed above. (EX1001 at ¶ 150; EX1048, FIGS. 1-7.)



(EX1048, FIG. 1.)

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

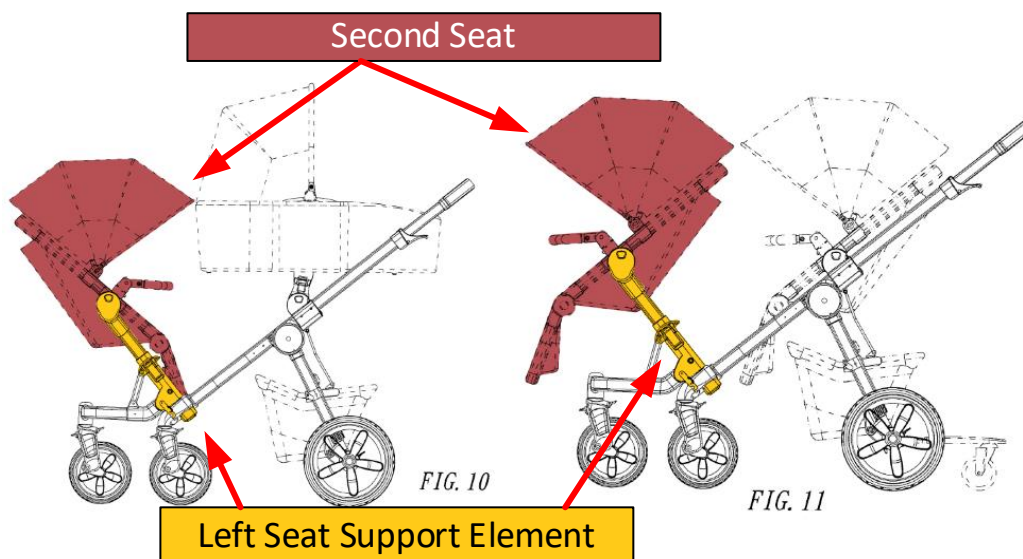
Therefore, Liao discloses limitations [1(g)]-[1(h)] or, alternatively, renders them obvious. (EX1001 at ¶ 152.)

f) [1(i)]

Liao's FIG.s show different types of seats being connected to the seat support elements, which a POSITA would have understood to mean that the seats are releasable and that various types of seats can be used with the frame at various times. (EX1001 at ¶ 155; EX1048, FIGS. 8-13.) Additionally, a POSITA would

have recognized that the coupling mechanism between the seat and the seat support elements is a conventional connector designed to allow the seat to be easily removed and connected. (EX1001 at ¶ 155; EX1048, FIGS. 11.). POSITA would have recognized that the second stroller seat is configured to serve its purpose of holding a child. (EX1001 at ¶ 155.)

As shown in FIG.s. 10 and 11, Liao discloses a second seat (the front seat) that is connected between and to the left and right seat connectors. (EX1001 at ¶ 156; EX1048, FIGS. 10-11.) Because the seats do not interfere with one another, and there is ample space for two children (one in each seat), POSITA would have understood that each seat can hold a respective child at the same time. (EX1001 at ¶ 156; EX1048, FIGS. 10-11.) Additionally, the seat connectors are “releasably connected” to the seat without the use of special skills or tools, for the reasons discussed above with respect to limitation [1(h)].



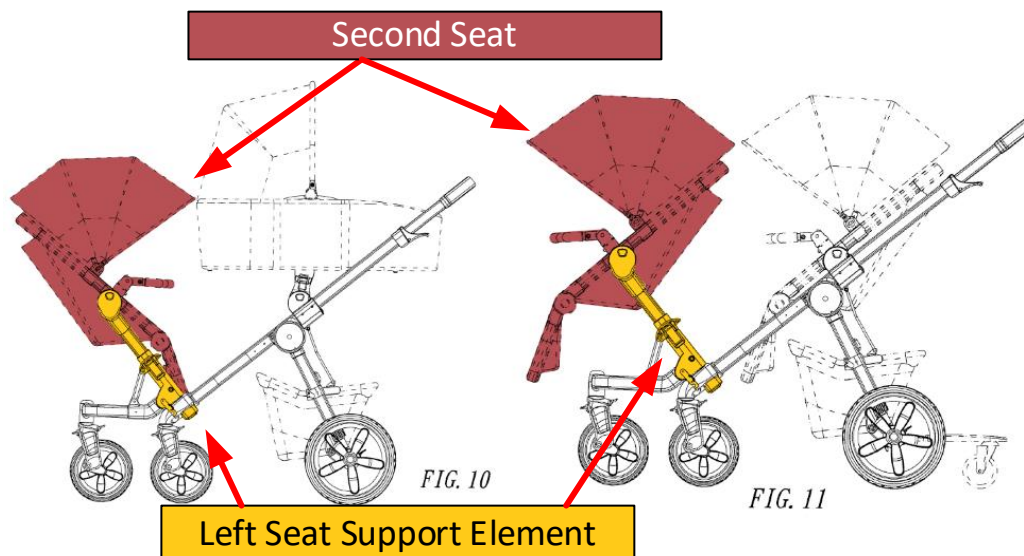
(EX1048, FIGS. 10, 11.)

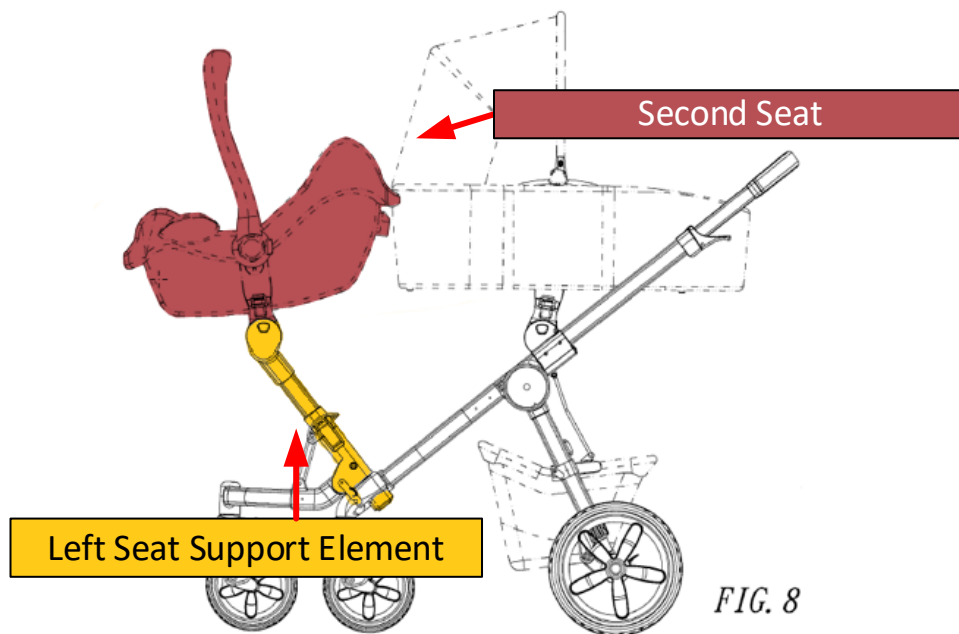
Therefore, Liao discloses or renders obvious limitation [1(i)]. (EX1001 at ¶ 156.)

B. Claim 2

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 ¶ 159; EX1048, FIGS. 10, 11.) FIG. 8 shows a car seat facing forward and a bassinet facing rearward. (EX1001 at ¶ 159; EX1048, FIGS. 8, 10, 11.)

Accordingly, Liao discloses the additional limitations of claim 2. (EX1001 at ¶ 160.)





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

C. Claim 3

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

(EX1001 at ¶ 162; EX1048, FIG. 5.) Accordingly, Liao discloses the additional limitations of claim 3. (EX1001 at ¶ 162.)

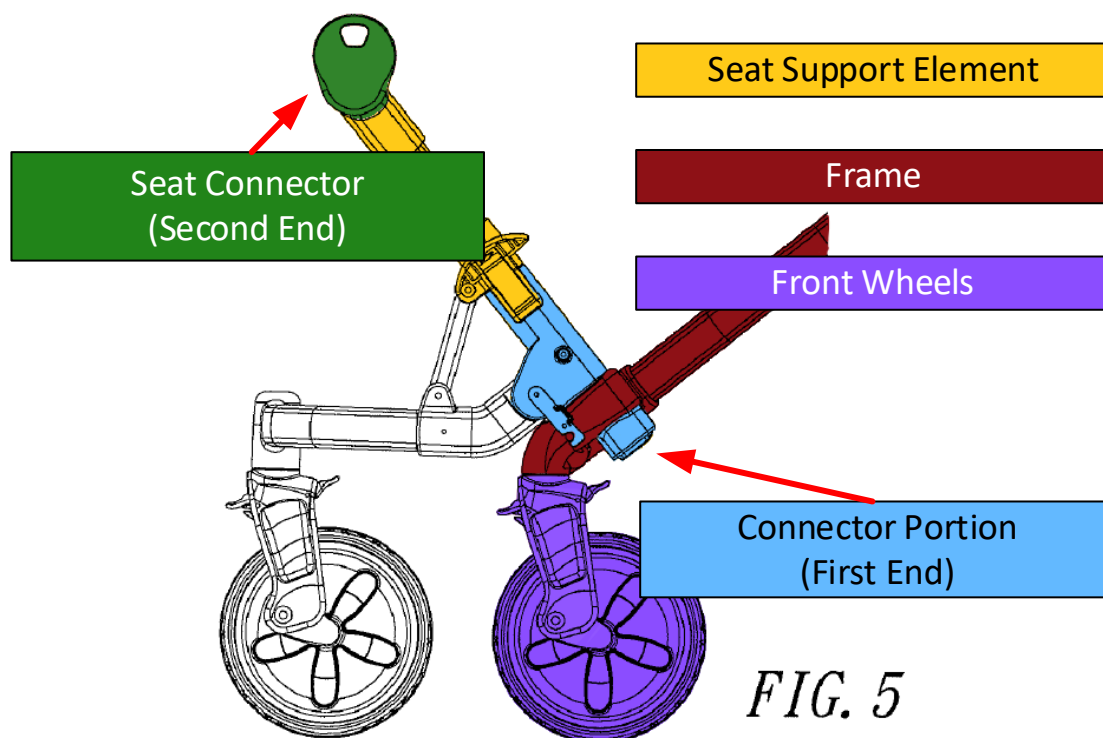
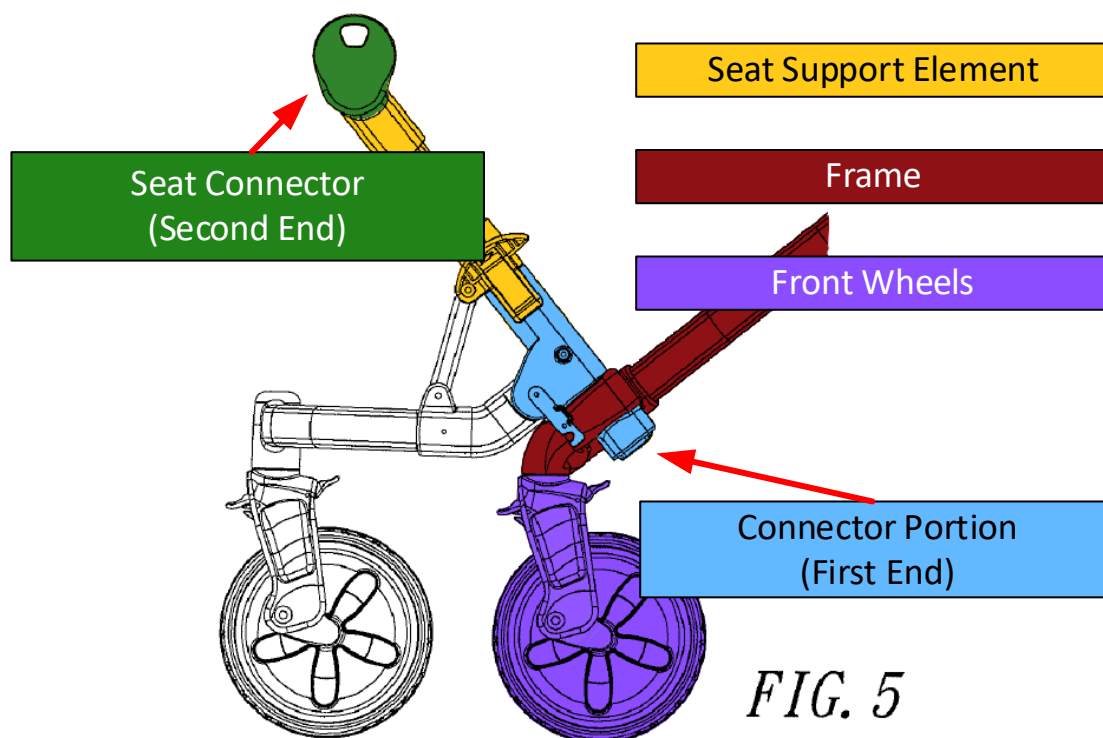


FIG. 5

(EX1048, FIG. 5.)

D. Claim 4

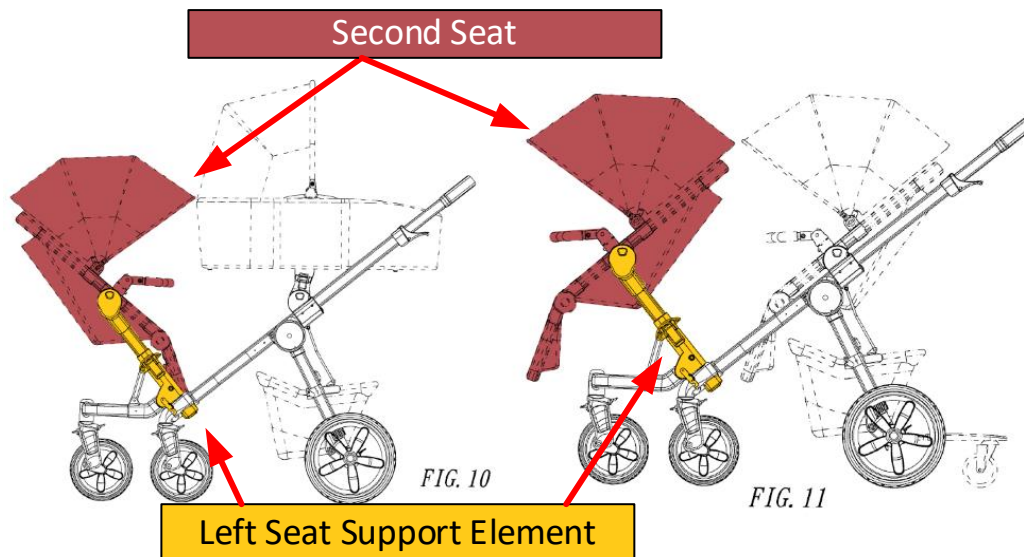
As shown in FIG. 5 (below), each first end releasably connects directly to the stroller frame. (EX1001 at ¶ 163; EX1048, FIG. 5.) Therefore, Liao discloses the additional limitations of claim 4. (EX1001 at ¶ 164.)



(EX1048, FIG. 5.)

E. Claim 5

As shown in FIGS. 8-12, each second end is releasably connected to the second seat. (EX1001 at ¶ 165; EX1048, FIGS. 8-12.) Therefore, Liao discloses the additional limitations of claim 5. (EX1001 at ¶ 165.)

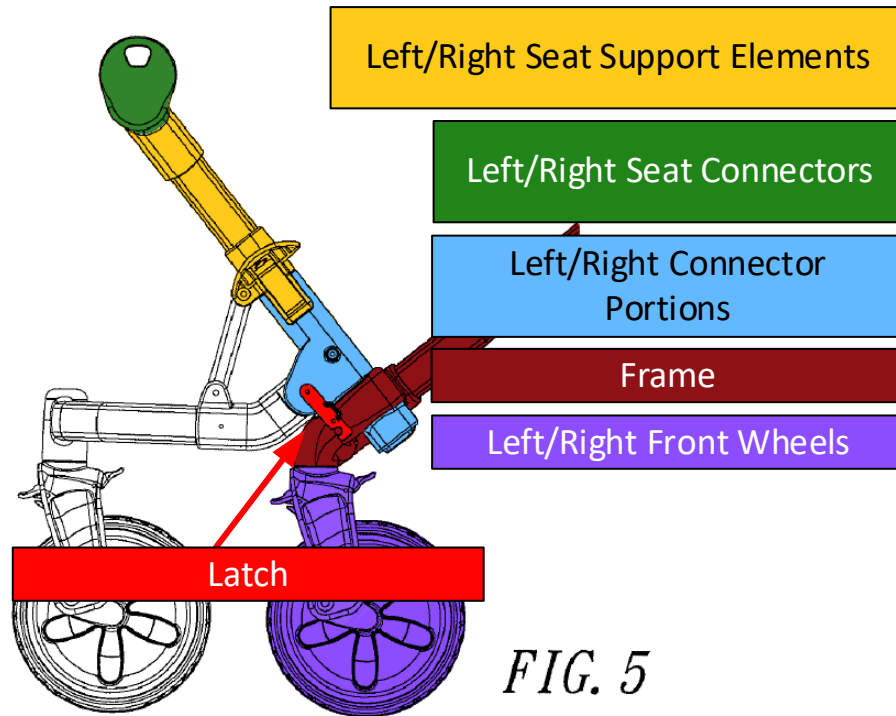


(EX1048, FIG. 10, 11.)

F. Claim 6

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. (EX1001 at ¶ 166; EX1048, FIGS. 1, 5.) Such a latch is a snap at least in that it snaps on to the protrusion. (EX1001 at ¶ 166; EX1048, FIGS. 1, 5.) Furthermore, such a latch is held in place by friction by virtue of it snapping around the protrusion, and thus is a friction fit. (EX1001 at ¶ 166; EX1048, FIGS. 1, 5.) 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). (EX1001 at ¶ 166; EX1048, FIGS. 1, 5.)

Accordingly, Liao discloses the limitations of claim 6. (EX1001 ¶ 167.)



(EX1048, FIG. 5.)

VIII. GROUND 2 – LIAO IN VIEW OF CHEN AND SWEENEY

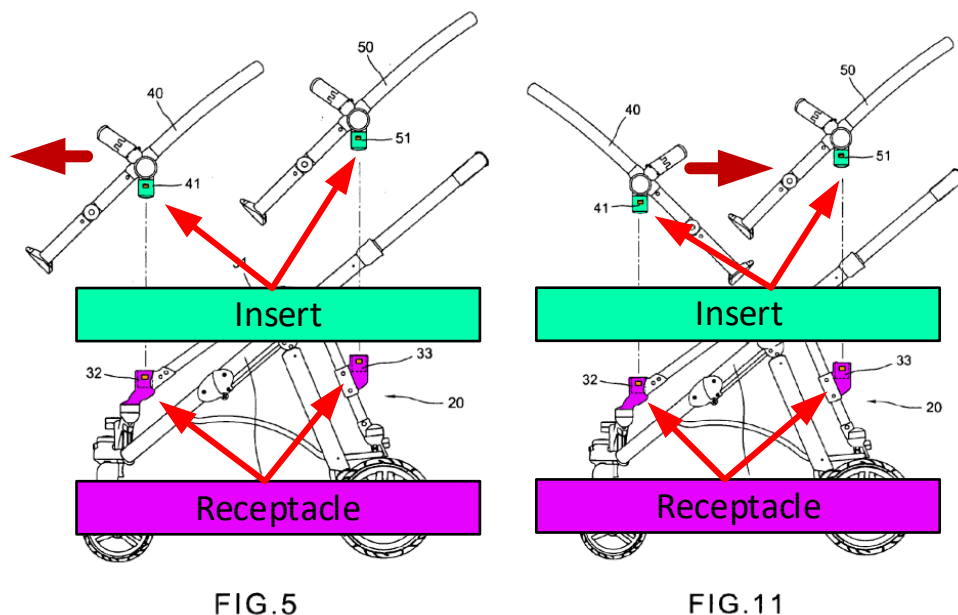
Claims 1-6 were obvious in view of Liao, as explained with respect to Ground 1. (*Supra*, §§ VII(A)-(F); EX1001 at ¶ 168.) However, if the PO argues that Liao fails to disclose one or more limitations of claims 1-6, then Liao, Chen, and Sweeney render these claims obvious. (EX1001 at ¶ 168.) Furthermore, Liao, Chen, and Sweeney render claim 7 obvious. (EX1001 at ¶ 168.)

A. Claim 1

As discussed *supra* § VII(A), Liao discloses a seat attachment for a stroller comprising separate left and right attachment portions with seat support elements. (EX1001 at ¶ 169.) Chen discloses receptacles (32, 33) for a stroller into which inserts (41, 51) for seats can be releasably inserted. (EX1001 at ¶ 170; EX1065, ¶¶ 5-8, 24.) The inserts and receptacles permit the seat to face forward or backward. (EX1001 at ¶ 170; EX1065, ¶¶ 5-8, ¶¶ 24, 26, FIGS. 5 & 11.) Sweeney discloses a height adjustable rear seat for a stroller or other infant carrying device. (EX1001 at ¶ 170; EX1067, col. 4:50-67, col. 5:1-9.) Sweeney discloses an embodiment wherein the seat has channels that are coupled to the frame, and a locking mechanism permits the seat to move up and down and be secured in place at a desired position on the frame. (EX1001 at ¶ 170; EX1067, col. 4:50-67, col. 5:1-8.) Sweeney also discloses other embodiments. (EX1001 at ¶ 170; EX1067)

To the extent that PO argues that Liao's seat support elements do not already releasably connect a seat in either a forward or backward position, POSITA would have been motivated to modify Liao's seat support elements to releasably connect a seat in either a forward or backward position, as taught by Chen. (EX1001 at ¶ 171; EX1065, ¶¶ 5-6, 24.) POSITA would have been motivated to modify Liao's seat support elements as taught by Chen because POSITA would have known that it is desirable to use releasable 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. (EX1001 at ¶ 171; EX1065, ¶¶ 5-6.)

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 ¶ 172.)



(EX1065, FIG. 5, 11.)

To the extent that PO argues that Liao and/or Sweeney do not disclose the second seat attachment being coupled to the frame at a second vertical position substantially below the first vertical position, POSITA would have been motivated to modify Liao's seats to couple the second seat attachment at a second vertical position substantially below the first vertical position of the first seat, as taught by Chen. (EX1001 at ¶ 173.)

POSITA would have been motivated to modify Liao's second seat attachment as taught by Chen because Chen teaches that it is desirable to place the rear seat higher than the front seat and to ensure that the distance between the seats is long enough because this prevents interference between the two seats, which POSITA would have known is beneficial for preventing difficulty or

inconvenience operating the seats and stroller. (EX1001 at ¶ 174; EX1065, ¶ 26.) It would have been obvious to POSITA that coupling the second seat attachment at a lower position than the first vertical position would be an easy means of lowering the height of the second seat. (EX1001 at ¶ 174; EX1065, ¶ 26.)

POSITA would have had a reasonable expectation of success combining Chen with Liao and Sweeney because each reference discloses stroller systems that use conventional design components, and because integrating Sweeney's and/or Chen's components and/or functionality into Liao would have been straightforward use of known components well-within POSITA's skill. (EX1001 at ¶ 175.)

To the extent that PO argues that Liao and/or Chen do not disclose the second seat attachment being coupled to the frame at a second vertical position substantially below the first vertical position, POSITA would have been motivated to modify Liao's second seat attachment to couple the second seat attachment at a second vertical position substantially below the first vertical position of the first seat, as taught by Sweeney. (EX1001 at ¶ 176.)

POSITA would have been motivated to modify Liao's second seat attachment as taught by Sweeney because Sweeney teaches that it is desirable to make the rear seat height-adjustable so that the rear seat can be moved up and down, thereby providing the child in the rear seat with a view over the front seat, which POSITA would have known is beneficial for the child in the rear seat.

(EX1001 at ¶ 177; EX1067, col. 2:26-37.) Specifically, Sweeney discloses an embodiment wherein the seat has channels that are coupled to the frame, and a locking mechanism permits the seat to move up and down and be secured in place at a desired position on the frame. (EX1001 at ¶ 177; EX1067, col. 4:50-67, col. 5:1-9.) It would have been obvious to POSITA that integrating a sliding seat into Liao would result in the sliding seat at least some of the time being coupled at a first vertical position substantially above the second vertical position. (EX1001 at ¶ 177.)

POSITA would have had a reasonable expectation of success combining Sweeney with Liao and Chen because each reference discloses stroller systems that use conventional design components, and because integrating Sweeney's and/or Chen's components and/or functionality into Liao would have been straightforward use of known components well-within POSITA's skill. (EX1001 at ¶ 178.)

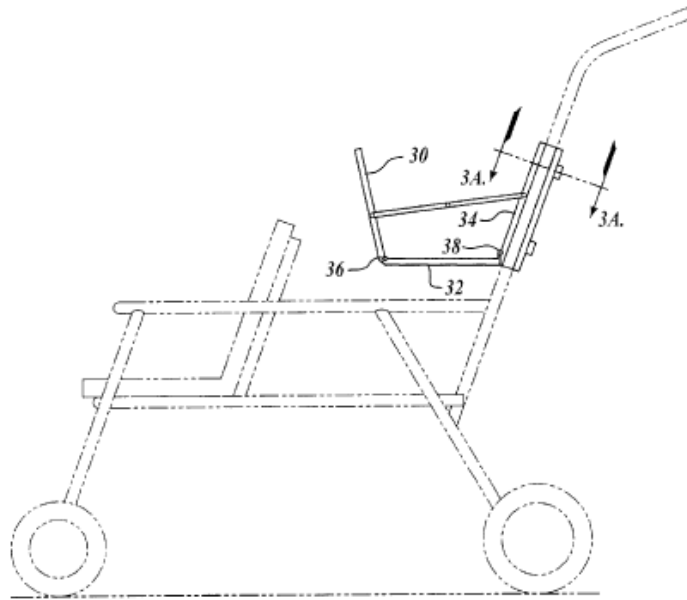


Fig. 2A.

(EX1067, FIG. 2A.)

Liao discloses or renders obvious the elements of claim 1 for the same reasons as discussed *supra* § VII(A). (EX1001 at ¶ 179.)

The combination of Liao with Chen and Sweeney as established above in the discussion of this claim also discloses, with respect to elements [1f] and [1h] of this claim, a stroller with left and right seat support elements that are capable of releasably connecting a seat facing either forward or backward because the combination of Liao with Chen and Sweeney incorporates Chen's forward and rear-facing functionality into Liao. (EX1001 at ¶ 180; EX1065, ¶¶ 5-8, 24.) With respect to elements [1c] and [1d] the same combination of Liao with Chen and

Sweeney discloses a stroller with the second seat coupled to the stroller frame at a second vertical position substantially below the first vertical position because the combination of Liao with Chen and Sweeney incorporates Sweeney's or Chen's higher rear seat that is coupled to the frame at a first vertical position substantially above the front seat and wherein the front seat is coupled to the frame at a second vertical position substantially below the rear seat and the first vertical position. (EX1001 at ¶ 180; EX1065, ¶ 26; EX.1067, col. 2:26-37, col. 4:50-67, col. 5:1-9.)

Accordingly, Liao in view of Chen and Sweeney discloses or renders obvious all the limitations of claim 1. (EX1001 at ¶ 181.)

B. Claims 2-6

Liao in view of Chen and Sweeney discloses and/or renders obvious claims 2-6 for the same reasons that Liao discloses and/or renders obvious claims 2-6, as discussed *supra*, § VII(B)-(E). (EX1001 ¶¶ 182-187.)

Furthermore, Chen discloses claim 2 because Chen discloses that two the seats may be plugged into the frame of the stroller, necessarily requiring that the seats at least be stroller seats (as they are seats for a stroller). (EX1001 at ¶ 182; EX1065, ¶ 8.)

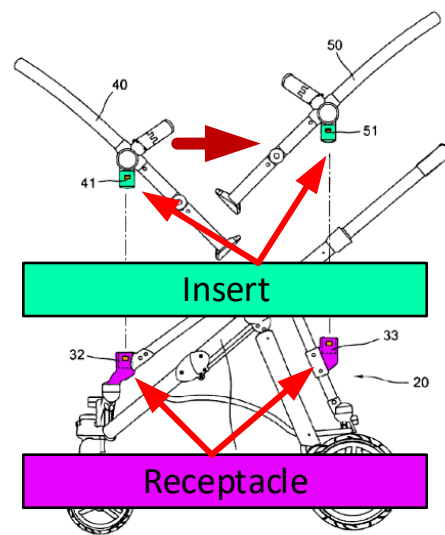
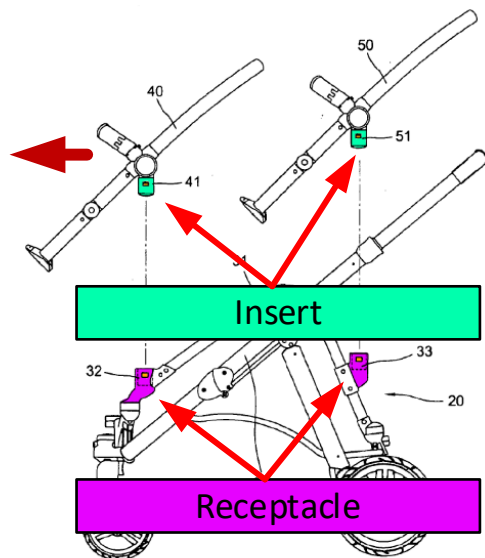
C. Claim 7

As discussed *supra* § VII, Liao discloses a seat attachment for a stroller comprising separate left and right attachment portions with seat support elements.

Chen discloses receptacles (32, 33) for a stroller into which inserts (41, 51) for seats can be releasably inserted. (EX1001 at ¶ 188; EX1065, ¶¶ 5-8, 24, FIGS. 5, 11.) The inserts and receptacles permit the seat to face forward or backward. (EX1001 at ¶ 188; EX1065, ¶¶ 5-8, 24, FIGS. 5, 11.) Sweeney discloses a height adjustable rear seat for a stroller or other infant carrying device. (EX1001 at ¶ 188; EX1067, col. 4:50-67, col. 5:1-9.) Sweeney discloses an embodiment wherein the seat has channels that are coupled to the frame, and a locking mechanism permits the seat to move up and down and be secured in place at a desired position on the frame. (EX1001 at ¶ 188; EX1067, col. 4:50-67, col. 5:1-9.) Sweeney also discloses other embodiments. (EX1001 at ¶ 188; EX1067, col. 4:50-67, col. 5:1-9)

To the extent that PO argues that Liao's seat support elements do not already releasably connect a seat in either a forward or backward position, POSITA would have been motivated to modify Liao's seat support elements to releasably connect a seat in either a forward or backward position, as taught by Chen. (EX1001 at ¶ 189; EX1065, ¶¶ 5-6, 24.) POSITA would have been motivated to modify Liao's seat support elements as taught by Chen because POSITA would have known that it is desirable to use releasable 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. (EX1001 at ¶ 189; EX1065, ¶¶ 5-6.)

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 ¶ 190.)



(EX1065, FIG. 5, 11.)

To the extent that PO argues that Liao and/or Sweeney do not disclose the front (second) seat being positioned at a second vertical position substantially below the first vertical position, POSITA would have been motivated to modify Liao's seats to place the front (second) seat at a second vertical position substantially below the first vertical position of the first seat, as taught by Chen. (EX1001 at ¶ 191.)

POSITA would have been motivated to modify Liao's seats as taught by Chen because Chen teaches that it is desirable to place the rear seat higher than the front seat and ensure that the distance between the seats is long enough because this prevents interference between the two seats, which POSITA would have known is beneficial for preventing difficulty or inconvenience operating the seats and stroller. (EX1001 at ¶ 192; EX1065, ¶ 26.)

POSITA would have had a reasonable expectation of success combining Chen with Liao and Sweeney because each reference discloses stroller systems that use conventional design components, and because integrating Sweeney's and/or Chen's components and/or functionality into Liao would have been straightforward use of known components well-within POSITA's skill. (EX1001 at ¶ 193.)

To the extent that PO argues that Liao and/or Chen do not disclose the front (second) seat being positioned at a second vertical position substantially below the first vertical position, POSITA would have been motivated to modify Liao's seats to place the front (second) seat at a second vertical position substantially below the first vertical position of the first seat, as taught by Sweeney. (EX1001 at ¶ 194.)

POSITA would have been motivated to modify Liao's seats as taught by Sweeney because Sweeney teaches that it is desirable to make the rear seat height-adjustable so that the rear seat can be moved up and down, thereby providing the child in the rear seat with a view over the front seat, which POSITA would have

known is beneficial for the child in the rear seat. (EX1001 at ¶ 195; EX1067, col. 2:26-37.) Specifically, Sweeney discloses an embodiment wherein the seat has channels that are coupled to the frame, and a locking mechanism permits the seat to move up and down and be secured in place at a desired position on the frame. (EX1001 at ¶ 195; EX1067, col. 4:50-67, col. 5:1-9.)

POSITA would have had a reasonable expectation of success combining Sweeney with Liao and Chen because each reference discloses stroller systems that use conventional design components, and because integrating Sweeney's and/or Chen's components and/or functionality into Liao would have been straightforward use of known components well-within POSITA's skill. (EX1001 at ¶ 196.)

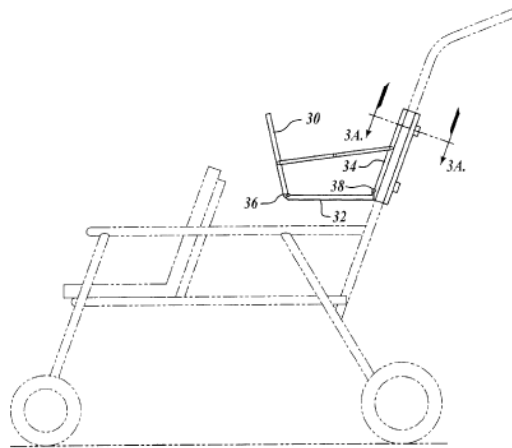


Fig. 2A.

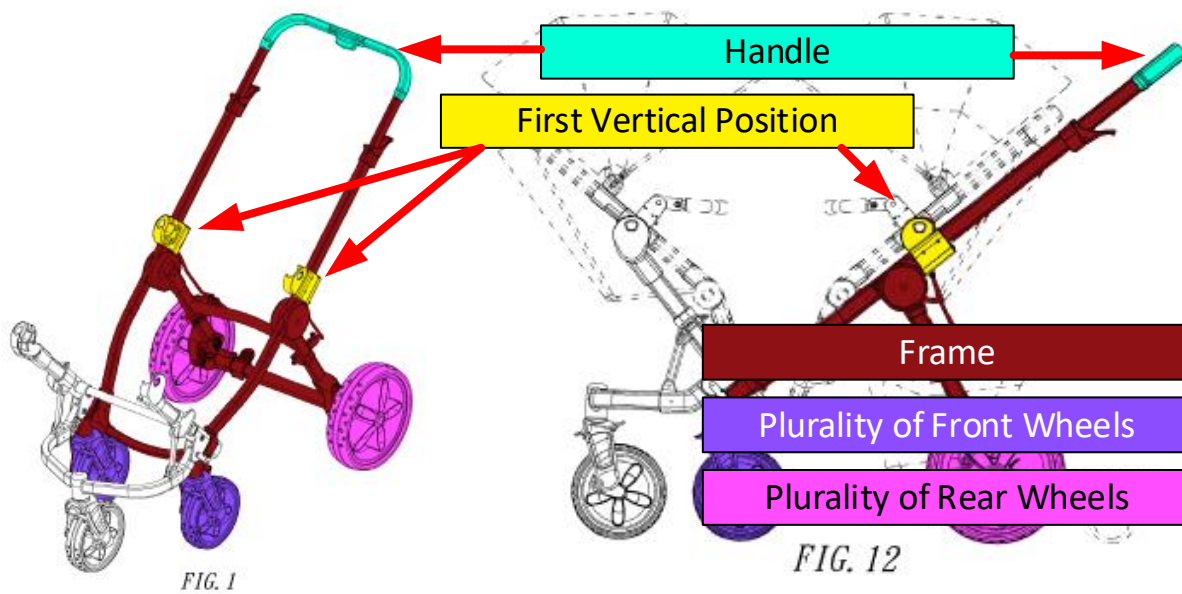
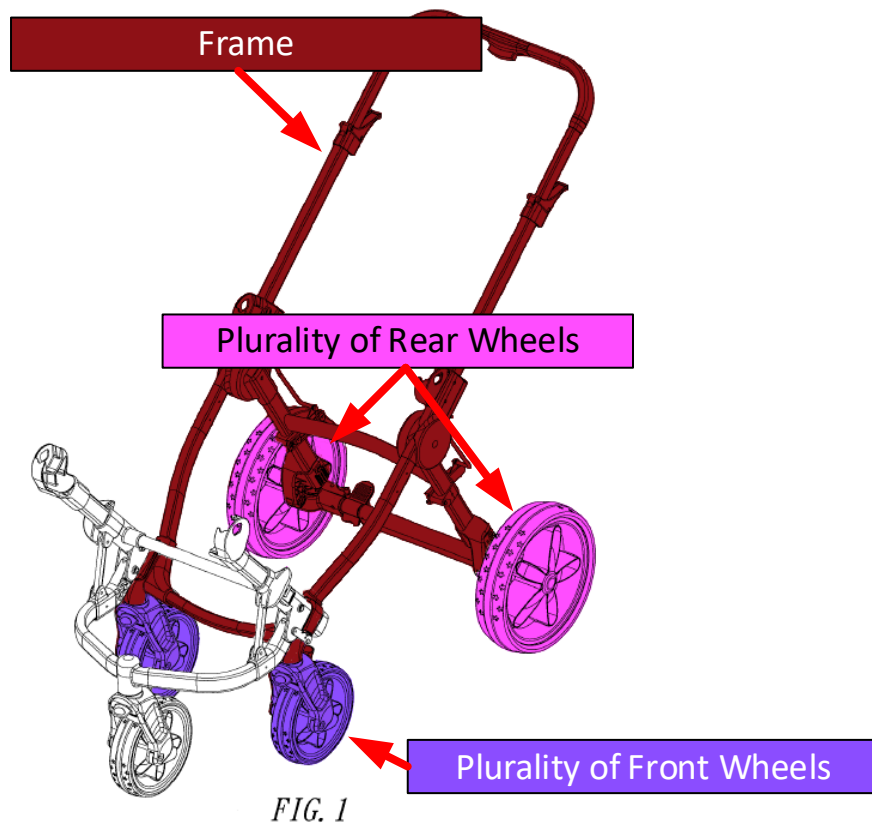
(EX1067, FIG. 2A.)

a) [7(Pre)]-[7(c)]

FIG.s 1, 5, and 11 of Liao illustrate a stroller and a second seat attachment for a stroller. (EX1001 at ¶ 197; EX1048, FIGS. 1, 5, 11.) FIG.s 8-13 show releasable seats attached to both the stroller and the seat attachment. (EX1001 at ¶ 197; EX1048, FIGS. 8-13.) FIG. 1 shows that the stroller has a frame, two rear wheels, and two front wheels. (EX1001 at ¶ 197; EX1048, FIGS. 8-13)

FIG.s 8-13 of Liao further illustrate a first seat coupled to the stroller frame along a first vertical position of the stroller frame. (EX1001 at ¶ 198; EX1048, FIGS. 8-13.) Furthermore, the first vertical position is closer to the handle of the stroller than it is to the wheels of the stroller, and is closer to the handle of the stroller than the second vertical position. (EX1001 at ¶ 198; EX1048, FIGS. 8-13.) Because the first seat is a stroller seat, Liao discloses that the first seat is configured to hold a first child. (EX1001 at ¶ 198; EX1048, FIGS. 8-13.) To the extent that Liao does not explicitly state that the seat is configured to hold a first child, it would have been obvious to POSITA to use a first stroller seat to hold a first child as that is the purpose of a stroller seat. (EX1001 at ¶ 198; EX1048, FIGS. 8-13.)

Accordingly, Liao in view of Chen and Sweeney discloses or renders obvious limitations [7(Pre)]-[7(c)] of claim 7. (EX1001 at ¶ 200.)



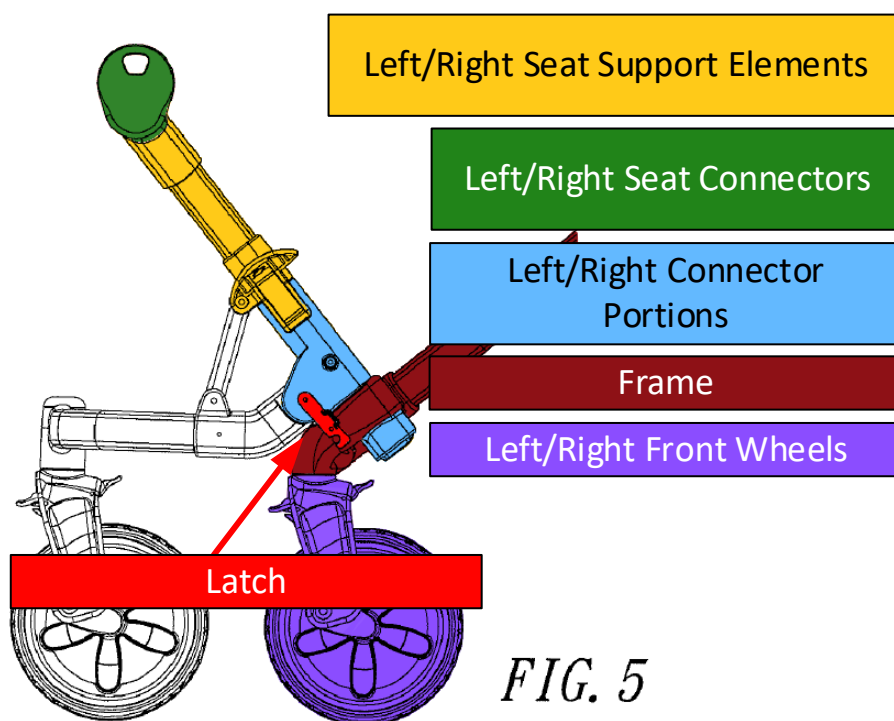
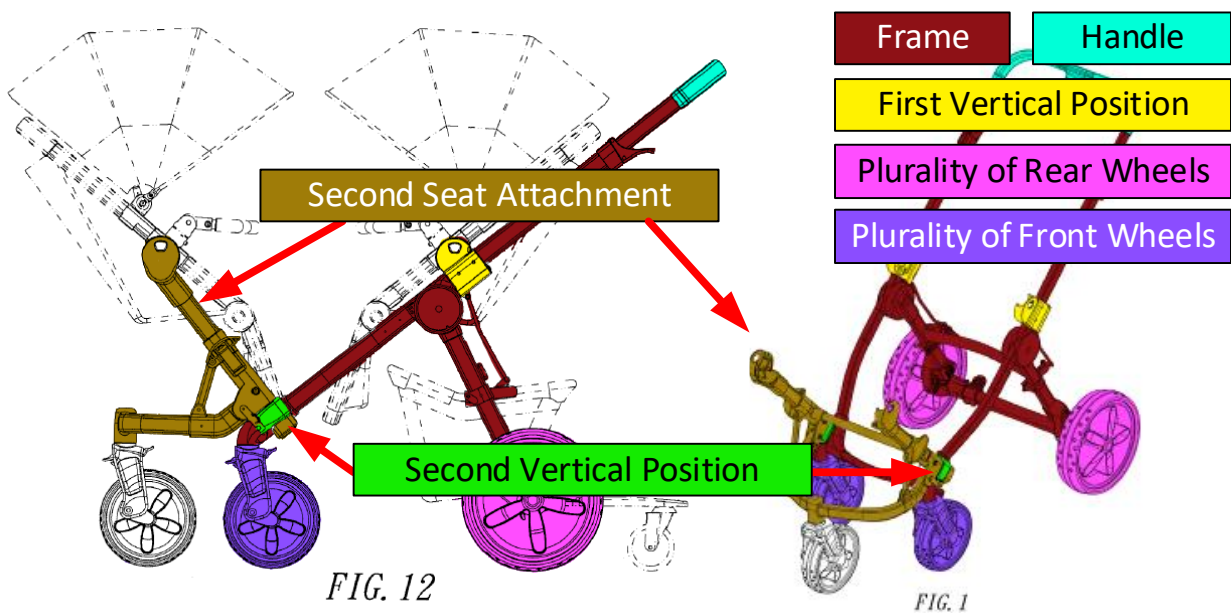
(EX1048, FIG. 1, 12.)

b) [7(d)]

FIG.s 1, 5 & 11 of Liao illustrate a second seat attachment for a stroller. (EX1001 at ¶ 201; EX1048, FIGS. 1, 5, 11.) FIG.s 8-13 show releasable seats attached to the second seat attachment. (EX1001 at ¶ 201; EX1048, FIGS. 8-13.) Therefore, FIG.s 1, 5, 11, and 8-13 illustrate that the second (front) seat of Liao is releasable from the second seat attachment. (EX1001 at ¶ 201; EX1048, FIGS. 1, 5, 8-13.)

FIG.s 1 & 12 further show how the attachment frame members (located at the second vertical position) wrap around the connector portions of the second seat attachment. (EX1001 at ¶ 202; EX1048, FIGS. 1, 4, 5.) FIG. 5 illustrates a latch that also couples the second seat attachment to the stroller frame. (EX1001 at ¶ 202; EX1048, FIGS. 1, 4, 5.) This position is the position where the second seat attachment is coupled to the stroller frame. (EX1001 at ¶ 202; EX1048, FIGS. 1, 4, 5.) FIG.s 1 and 12 illustrate that this position is closer to the front wheels than to the handle, and closer to the front wheels than the first vertical position. (EX1001 at ¶ 202; EX1048, FIGS. 1, 12.)

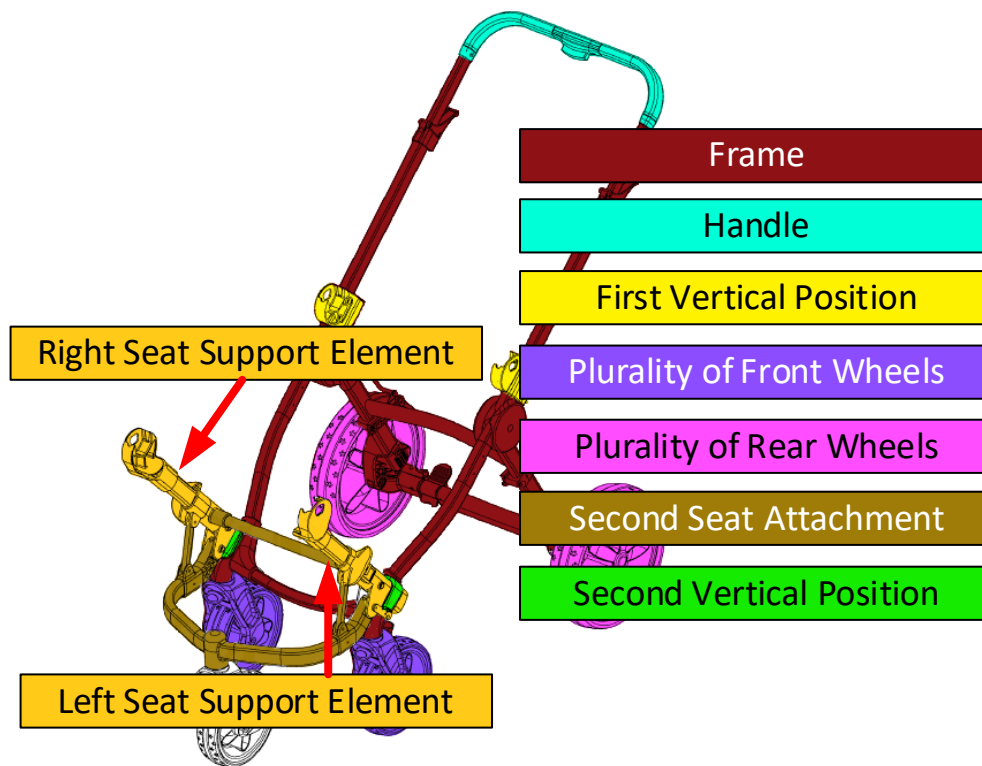
Accordingly, Liao in view of Chen and Sweeney discloses limitation [7(d)] of claim 7. (EX1001 at ¶ 203.)



(EX1048, FIG. 1, 5, 12.)

c) [7(e)]-[7(f)]

Liao discloses separate left and right seat support elements releasably 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. (EX1001 at ¶ 205; EX1048, FIG. 1.)



(EX1048, FIG. 1.)

Liao discloses that each seat support element comprises a connector portion that releasably connects to the stroller frame, and a respective (left/right) seat connector that releasably connects a second stroller seat in both forward and backward positions. (EX1001 at ¶ 206; EX1048, FIG. 1, 10, 11.)

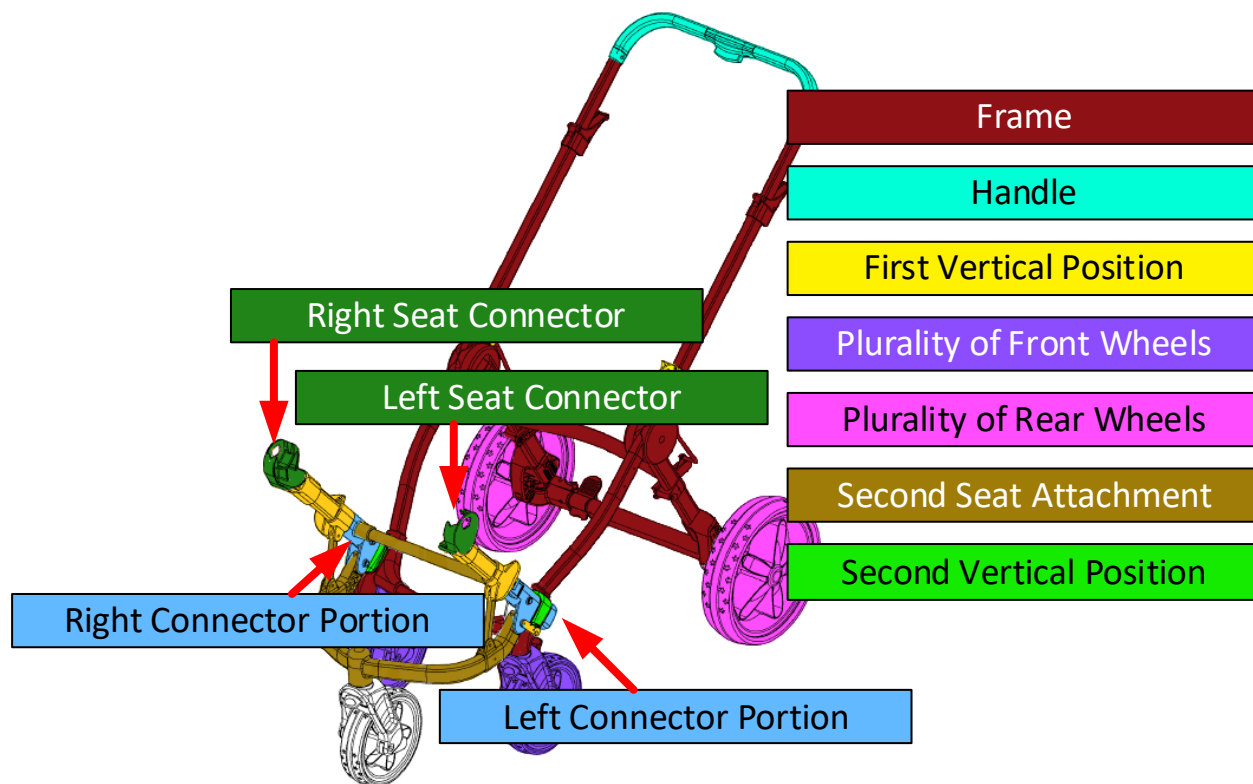


FIG. 1

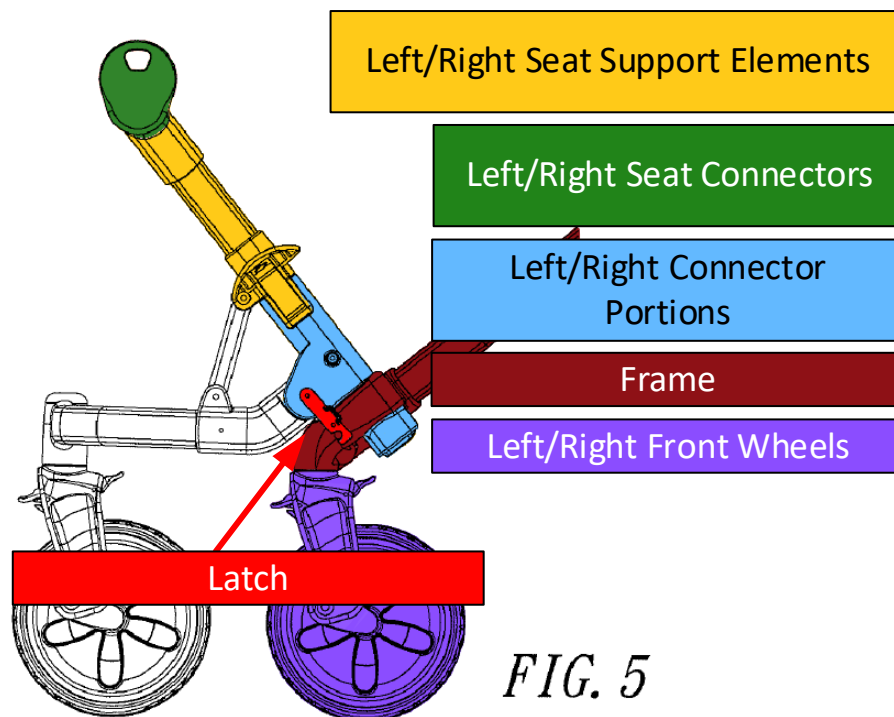
(EX1048, FIG. 1.)

The respective connector portions insert into respective slots at the second vertical position, and are latched to the frame by a latch (labeled below). (EX1001 at ¶ 207; EX1048, FIG. 1, 5.) The latch is a mechanism that allows the connector portion to be easily connected to and disconnected from the stroller frame without special skills or tools. (*Id.*) A caregiver can simply use his or her fingers to rotate the latch to the engaged or disengaged positions. (*Id.*) A latch would not be present if the connector was permanently connected to the stroller frame. (*Id.*) FIGS. 1 and 12 also illustrate that the left seat connector portion is closer to the left front wheel

than to the right front wheel, the handle, the first vertical position, the seat connector, and so forth. (EX1001 at ¶ 207; EX1048, FIG. 1, 12.)

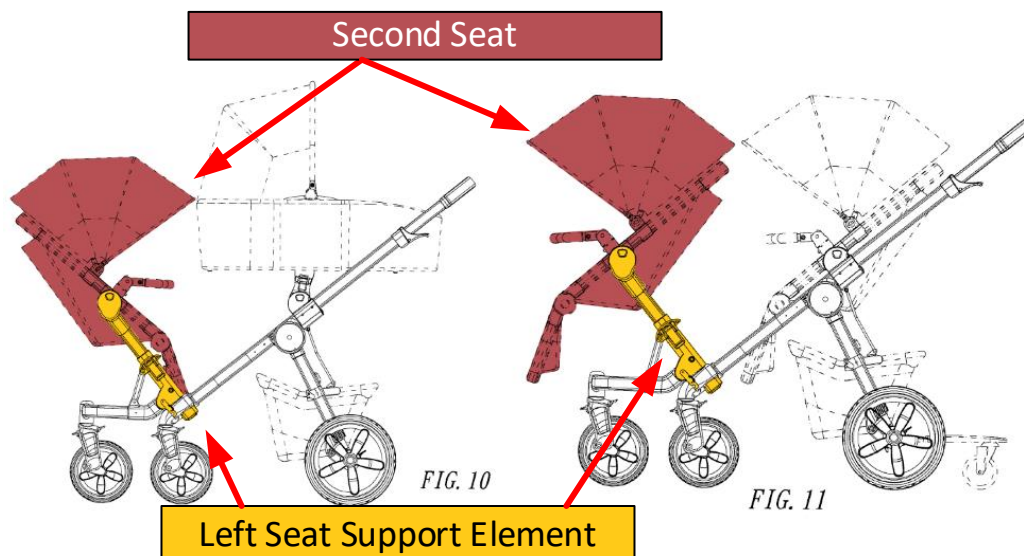
The seat connectors are the tops of the attachment portions, engageable, as shown in FIGS. 10 and 11, to a seat. (EX1001 at ¶ 208; EX1048, FIG. 10, 11.)

FIGS. 4 and 5 also show the seat connectors and connector portions; FIGS. 10 and 11 show that the second stroller seat (front seat) may be connected in either forward facing or rearward facing configurations. (EX1001 at ¶ 208; EX1048, FIG. 4, 5, 10, 11.)



(EX1048, FIG. 5.)

Liao's FIG.s show different types of seats being connected to the seat support elements, which a POSITA would have understood to mean that the seats are releasable and that various types of seats can be used with the frame at various times. (EX1001 at ¶ 209; EX1048, FIGS. 8-13.) Additionally, a POSITA would have recognized that the coupling mechanism between the seat and the seat support elements is a conventional connector designed to allow the seat to be easily connected and disconnected without the use of special skills or tools. (EX1001 at ¶ 209; EX1048, FIGS. 8-13.) Accordingly, the seat connectors "releasably connect[]" a second seat in either a forward or backward position. (*Id.*)



(EX1048, FIG. 10, 11.)

If PO argues that Liao's connector portions do not "releasably connect[]" to the stroller frame or that the seat connectors do not "releasably connect[]" the second seat, such features would have been obvious in view of Liao. A POSITA

would have known that it would have been desirable to have the connector portions releasable from the frame and the second seat releasable from the seat connectors because it would facilitate transportation and storage of the stroller system. (*Id.*) Additionally, a POSITA would have known that it was desirable to make these components able to connect or disconnect without the use of special tools or skills because it is easier, simpler, and more convenient to make these components releasable without special tools or skills. (*Id.*) A POSITA would have reasonably expected success because these modifications would have been straight forward, used conventional stroller components, and well-within POSITA's skill. (*Id.*)

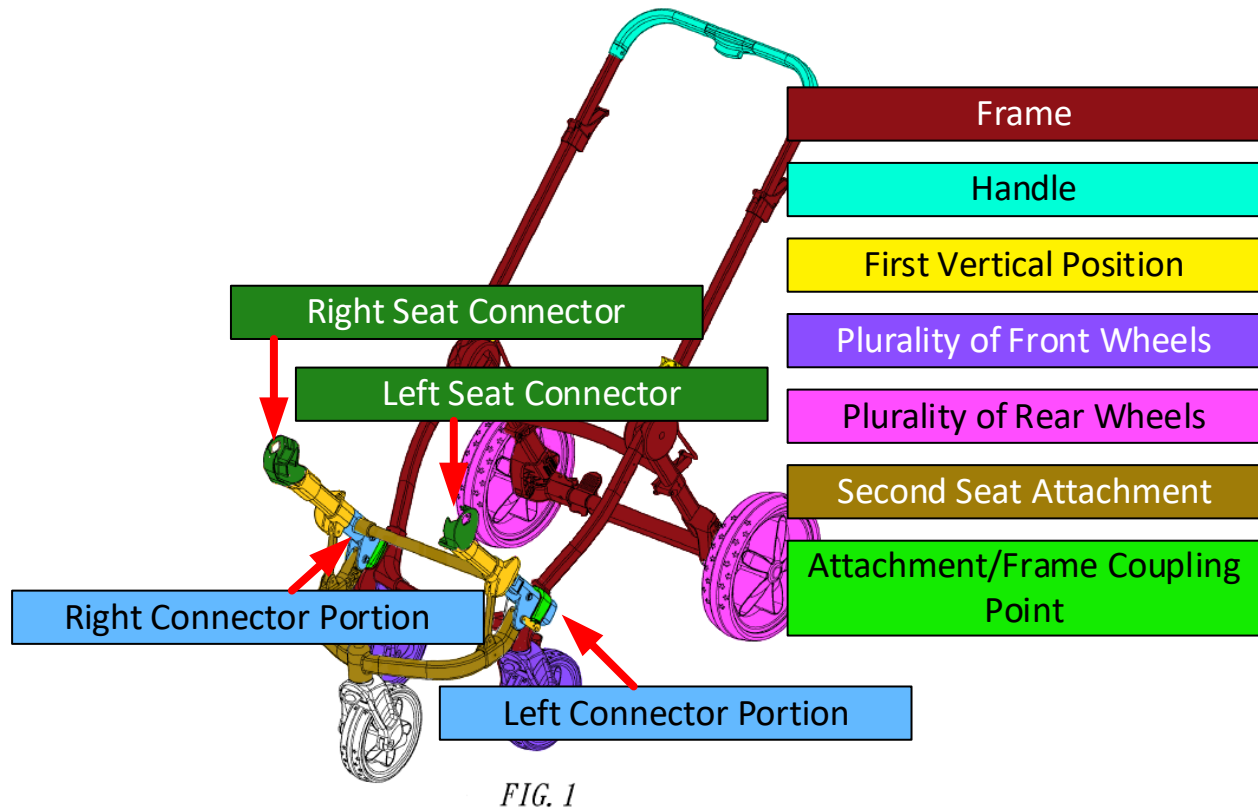
Accordingly, Liao discloses or renders obvious limitations [7(e)]-[7(f)].
(EX1001 at ¶ 210.)

d) [7(g)]-[7(h)]

Liao's stroller system has left-right symmetry. (EX1001 at ¶ 211; EX1048, FIGS. 1-7.) As shown in the FIG.s below, the right side of Liao's seat attachment mirrors all the features discussed above that the left side possesses. (EX1001 at ¶ 211; EX1048, FIGS. 1-7.) Therefore, Liao discloses or, alternatively, renders obvious the right-sided features recited in [1(g)]-(h)], for the same reasons discussed above. (EX1001 at ¶ 211; EX1048, FIGS. 1-7.)

Additionally, as shown in FIGS. 8-13, the seat is between the left and right seat connectors. (EX1001 at ¶ 212.)

Therefore, Liao discloses limitations [7(g)]-[7(h)] or, alternatively, renders them obvious. (EX1001 at ¶ 213.)



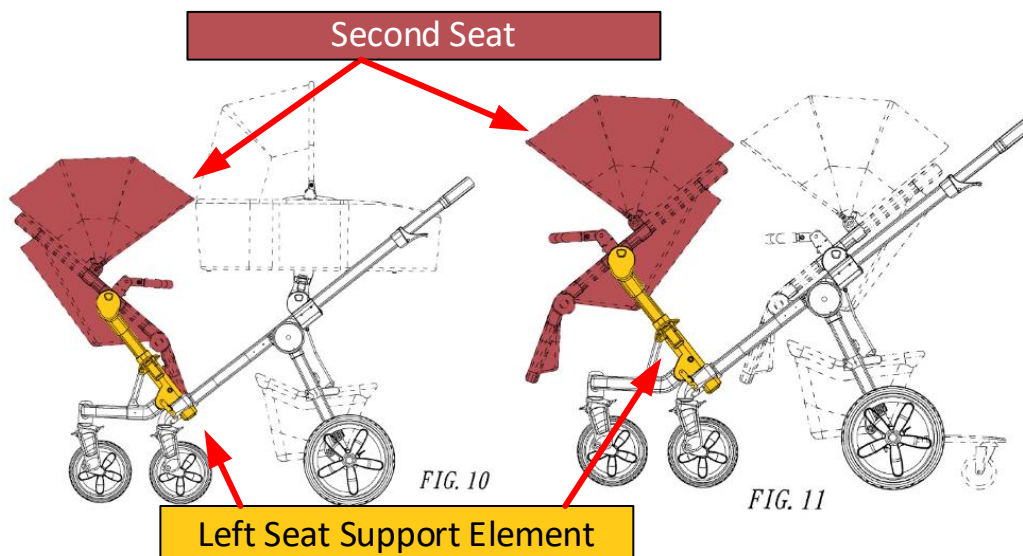
(EX1048, FIG. 1.)

e) [7(i)]-[7(j)]

Liao's FIG.s show different types of seats being connected to the seat support elements, which a POSITA would have understood to mean that the seats are releasable and that various types of seats can be used with the frame at various times. (EX1001 at ¶ 214; EX1048, FIGS. 8-13.) Additionally, a POSITA would have recognized that the coupling mechanism between the seat and the seat support elements is a conventional connector designed to allow the seat to be easily

removed and connected. (EX1001 at ¶ 214; EX1048, FIG. 11.). POSITA would have recognized that the second stroller seat is conFIG.d to serve its purpose of holding a child. (EX1001 at ¶ 214; EX1048, FIG. 11.)

As shown in FIG.s 10 and 11, Liao discloses a second seat (the front seat) that is connected between and to the left and right seat connectors. (EX1001 at ¶ 215; EX1048, FIGS. 10, 11.) Because the seats do not interfere with one another, and there is ample space for two children (one in each seat), POSITA would have understood that each seat can hold a respective child at the same time. (EX1001 at ¶ 215; EX1048, FIGS. 10, 11.)



(EX1048, FIG. 10, 11.)

The combination of Liao with Che and Sweeney as established above in the discussion of this claim also discloses, with respect to elements [7f] and [7h] of claim 7, a stroller with left and right seat support elements that are capable of

releasably connecting a seat facing either forward or backward because the combination of Liao with Chen and Sweeney incorporates Chen's forward and rear-facing functionality into Liao. (EX1001 at ¶ 216; EX1065, ¶¶ 5-6, 24.) With respect to elements [7c] and [7i], the same combination of Liao with Chen and Sweeney discloses a stroller with the second seat coupled to the stroller frame at a second vertical position substantially below the first vertical position because the combination of Liao with Chen and Sweeney incorporates Sweeney's or Chen's higher rear seat that is coupled to the frame at a first vertical position substantially above the front seat and wherein the front seat is coupled to the frame at a second vertical position substantially below the rear seat and the first vertical position. (EX1001 at ¶ 216; EX1065, ¶ 26; EX1067, col. 2:26-37, col. 4:50-67, col. 5:1-9.)

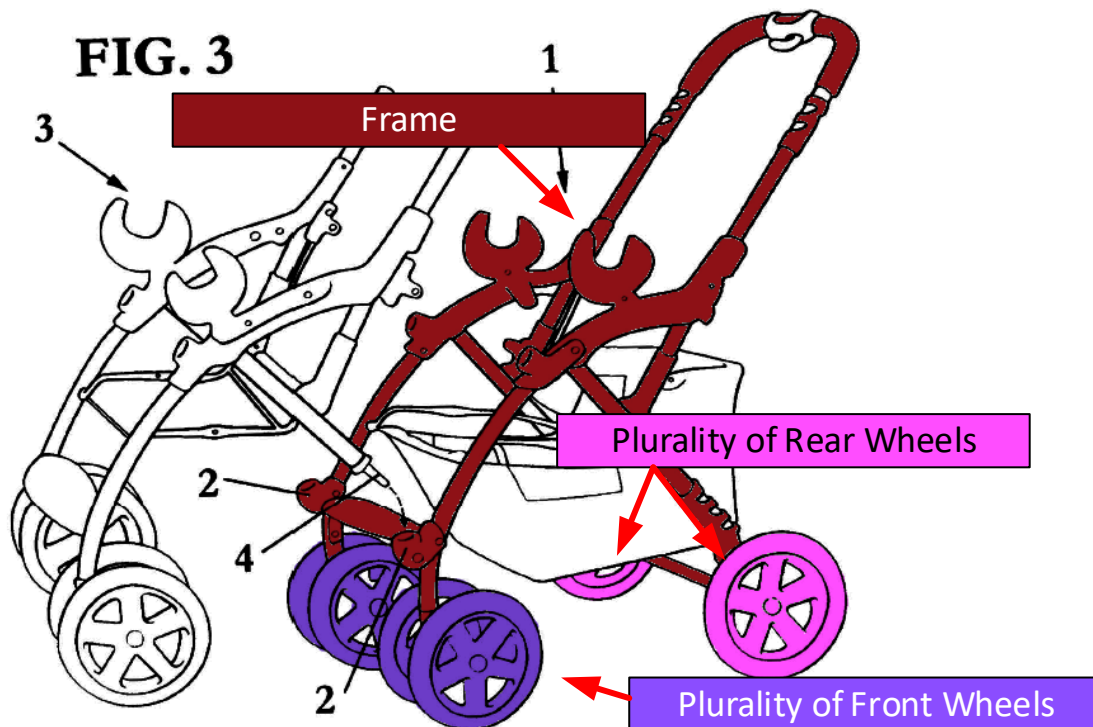
Accordingly, Liao in view of Chen and Sweeney discloses or renders obvious all the limitations of claim 7. (EX1001 at ¶ 217.)

IX. GROUND 3 – STOPP

A. Claim 1

a) [1(Pre)]-[1(b)]

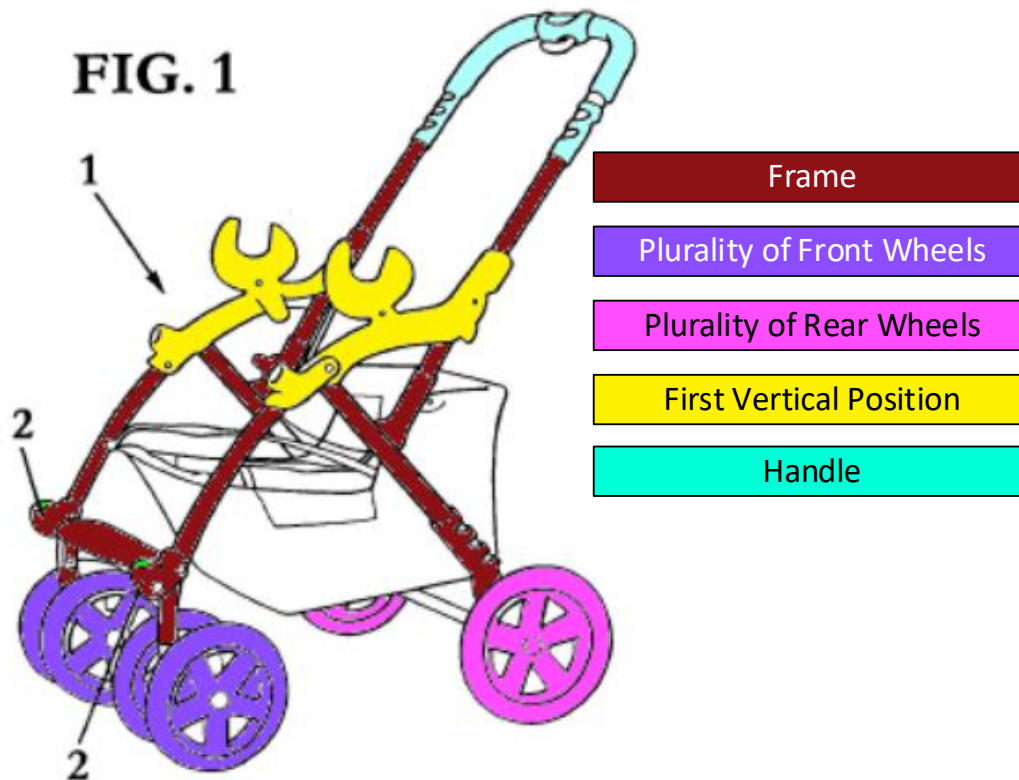
FIG.s 3 and 5 of Stopp illustrate a stroller and a second seat attachment for a stroller. (EX1001 at ¶ 218; EX1063, col.2:1-34, FIGS. 3, 5.) FIG.s 5 and 6 show releasable seats attached to both the stroller and the seat attachment. (EX1001 at ¶ 218; EX1063, col.2:1-34, FIGS. 5, 6.) FIG. 1 shows that the stroller has a frame, two rear wheels, and two front wheels. (EX1001 at ¶ 218; EX1063, col.2:1-34, FIG. 1.) Thus Stopp discloses limitations [1(Pre)]-[1(b)]. (*Id.*)

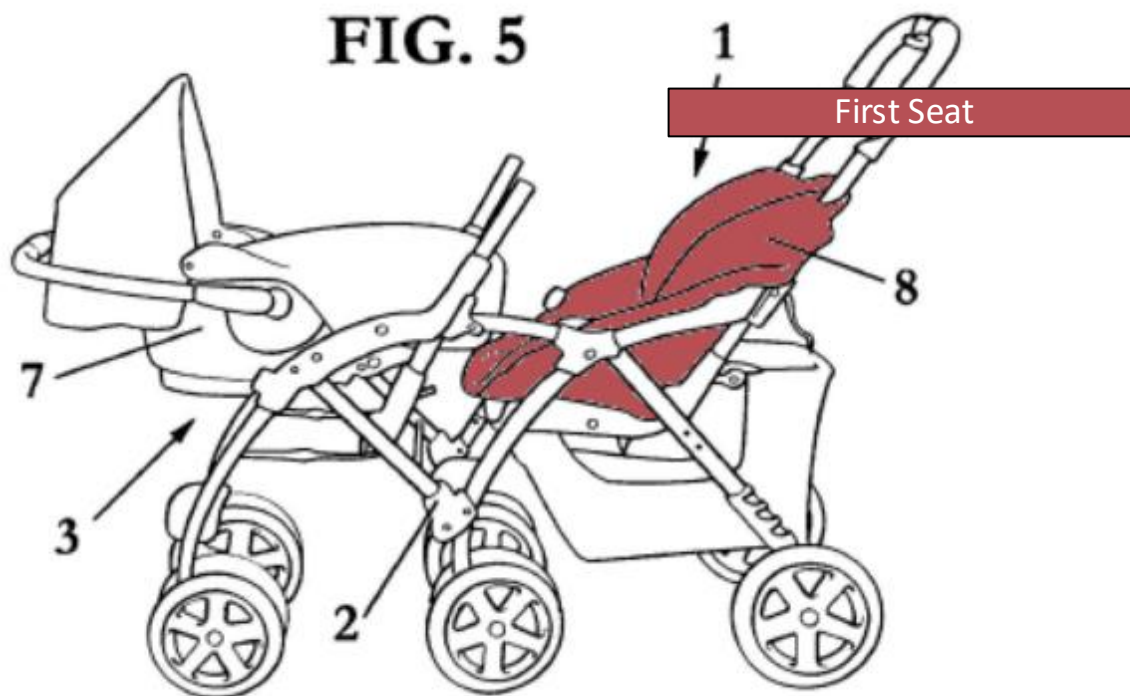


(EX1063, FIG. 3.)

b) [1(c)]-[1(d)]

As shown in FIG. 3, the stroller of Stopp includes a first seat (the rear seat) that is coupled to the stroller frame at a first vertical position closer to the handle of the stroller. (EX1001 at ¶ 219; EX. 1063, Stopp, col. 2:1-34, FIGS. 3-6.) The first seat of Stopp is also conFIG.d to hold a first child in the stroller. (EX1001 at ¶ 219; EX. 1063, Stopp, col. 2:1-34, FIGS. 3-6.)





(EX1063, FIG. 1, 5.)

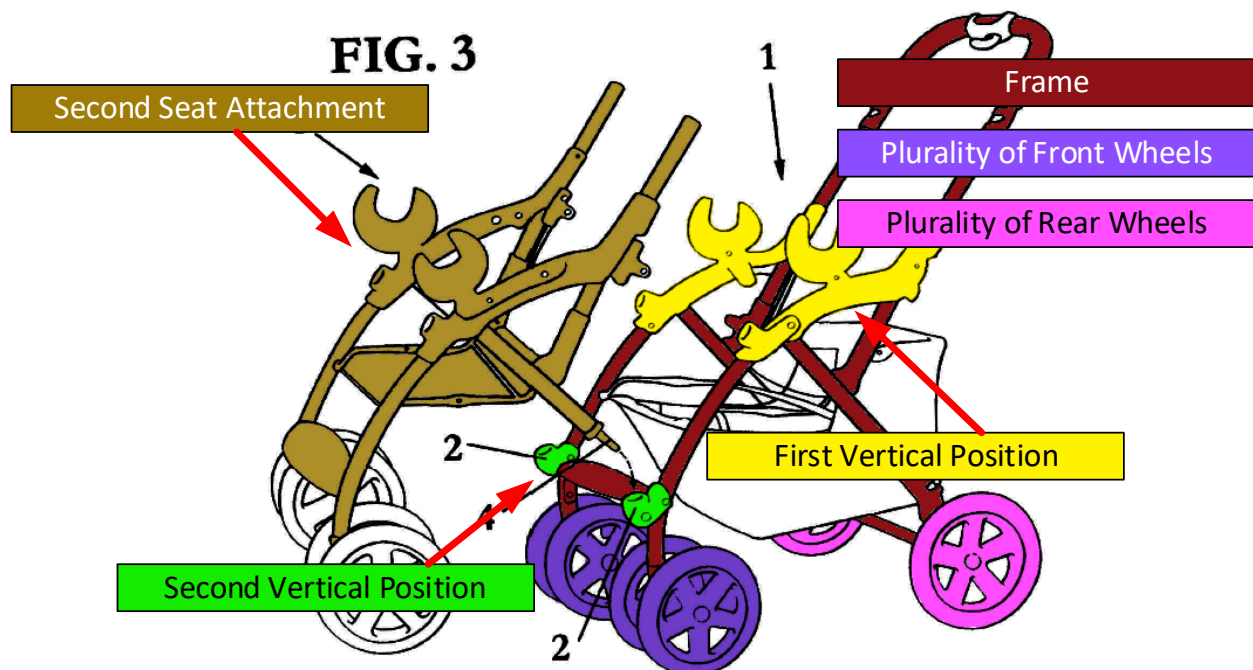
FIG. 3 of Stopp illustrates a second seat attachment for a stroller that is coupled to the stroller frame at a second vertical position substantially below the first vertical position. (EX1001 at ¶ 222; EX1063, Stopp, col. 2:1-34, FIGS. 3-6.)

FIG.s 5-6 also discloses that releasable seats can be coupled to the second seat attachment. (EX1001 at ¶ 222; EX1063, Stopp, col. 2:1-34, FIGS. 5, 6.) Therefore, FIG.s 1, 5, and 6 illustrate that the second (front) seat of Stopp is releasable from the second seat attachment. (EX1001 at ¶ 222; EX1063, Stopp, col. 2:1-34, FIGS. 1, 5, 6.)

FIG. 3 further shows the attachment frame members (located at the second vertical position) receive the connector portions of the second seat attachment.

(EX1001 at ¶ 223; EX1063, col. 2:1-34, FIGS. 1-3.) Stopp indicates that a retention mechanism may be used to secure the second seat attachment to the sockets and the frame. (EX1001 at ¶ 223; EX1063, col. 2:24-31.) The position where the sockets and rods of the attachment frame members connect to the second seat attachment is the second vertical position. (EX1001 at ¶ 223; EX1063, col. 2:24-31.)

As FIG. 3 illustrates, the second vertical position is substantially lower than the first vertical position. (EX1001 at ¶ 224; EX1063, col. 2:24-31.) Furthermore, FIG. 3 also illustrates that the second vertical position is closer to front wheels than to the handle, vertically lower than the first vertical position, and closer to the front wheels than the first vertical position. (EX1001 at ¶ 224; EX1063, col. 2:24-31.)

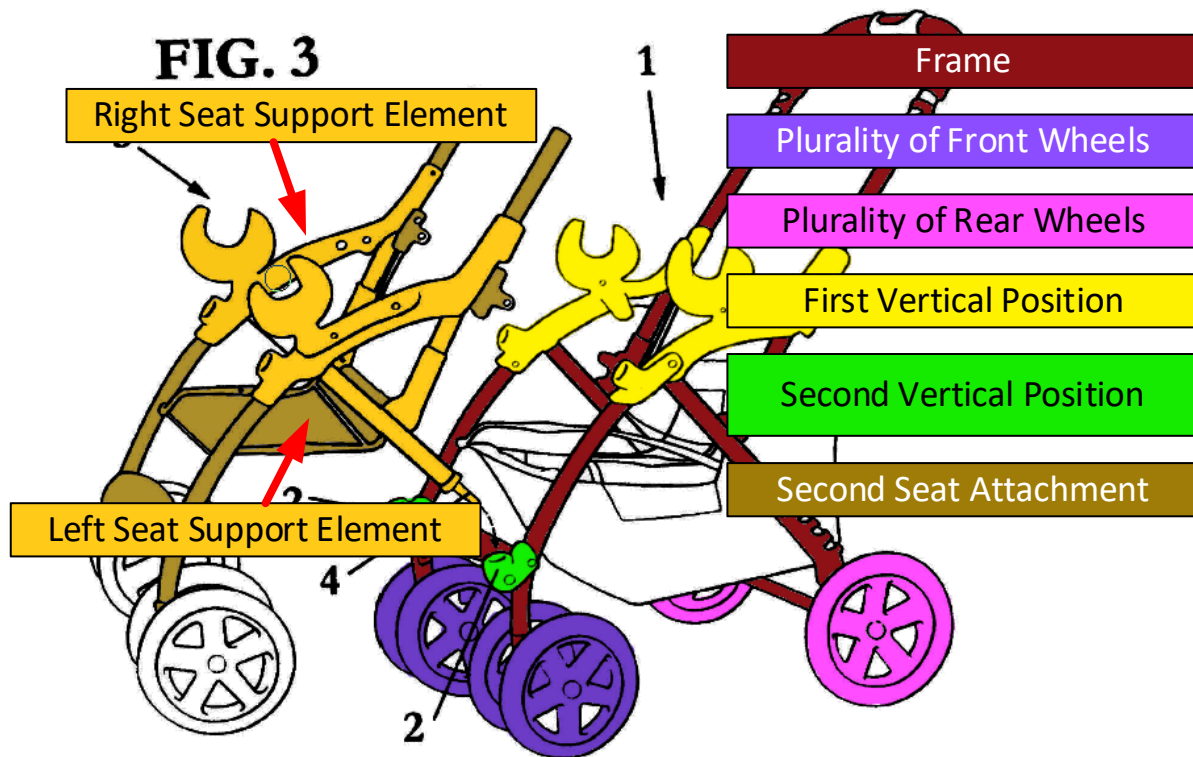


(EX1063, FIG. 3.)

Accordingly, Stopp discloses limitation [1(c)]-[1(d)]. (EX1001 at ¶ 225.)

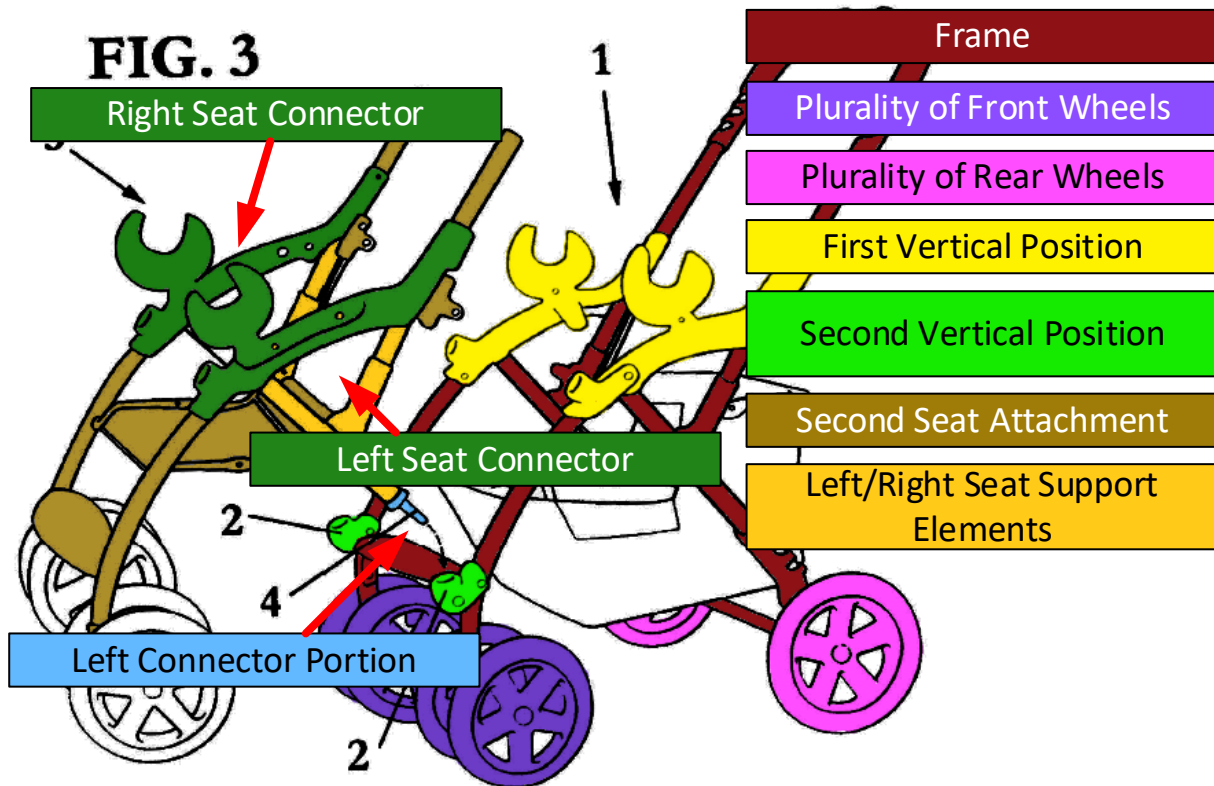
c) [1(e)]-[1(f)]

Stopp discloses a left seat support element that includes a first connector portion releasably connected to the stroller frame closer to a left front wheel and a left seat connector releasably connecting a second seat in either a forward or backward position. (EX1063, FIG. 2-3, 5-6; EX1001 at ¶ 227.) In particular, FIG. 3 illustrates separate left and right seat support elements releasably connected to the stroller frame and supported by the left and right-side attachment frame members which allow the stroller to be converted into a double stroller. (EX1001 at ¶ 227; EX1063, col. 2:1-34, FIG. 3.)



(EX1063, FIG. 3.)

Stopp discloses that each seat support element comprises a connector portion that releasably connects to an attachment frame member, and a respective (left/right) seat connector that releasably connects a second stroller seat in both forward and backward positions. (EX1001 at ¶ 228; EX1063, col. 2:1-34, FIG. 3.)



(EX1063, FIG. 3.)

The respective connector portions (rods) insert into respective attachment frame members (sockets) at the second vertical position, and are secured by a retention mechanism. (EX1001 at ¶ 229; EX1063, col. 2:10-34.) FIG. 3 also illustrates that the left seat connector portion is closer to the left front wheel than to the right front wheel, the handle, the first vertical position, the seat connector, and so forth. (EX1001 at ¶ 229; EX1063, col. 2:10-34.)

The seat connectors are the tops of the attachment portions, engageable, as shown in FIGS. 3, 5 and 6, to a seat. (EX1001 at ¶ 230; EX1063, col. 2:10-34.)

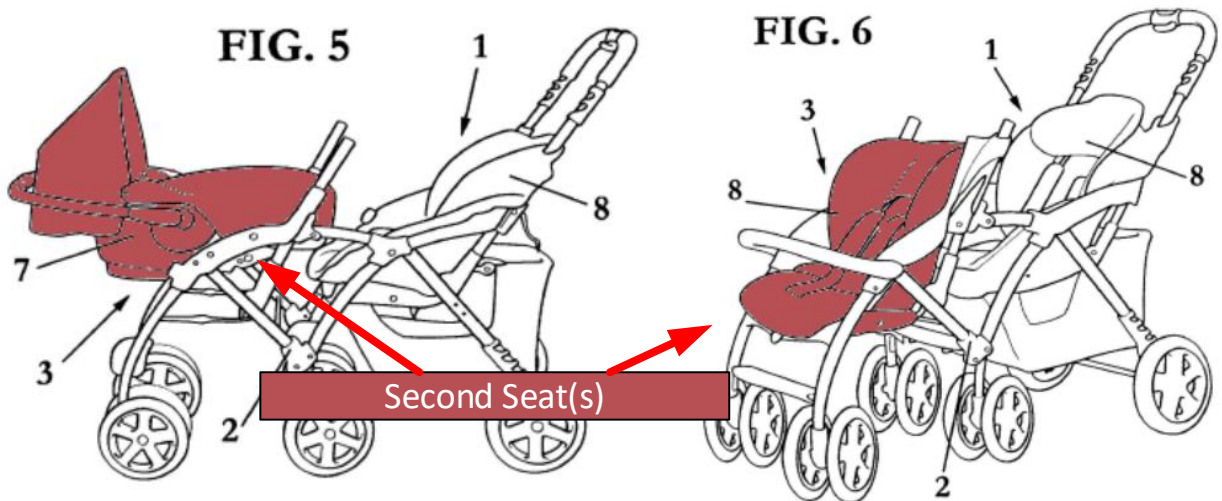
FIGS. 5 and 6 show that the second stroller seat (here, the front seat) may be

connected in either forward facing or rearward facing configurations. (EX1001 at ¶ 230; EX1063, FIGS. 5, 6.)

FIG.s 5-6 disclose different types of seats being connected to the seat support elements, and a POSITA would have understood to mean that the seats are releasable and that various types of seats can be used with the frame at various times. (EX1001 at ¶ 231; EX1063, FIGS. 5, 6.) 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. (EX1001 at ¶ 231; EX1063, col. 2:1-20.).

Furthermore, Stopp indicates that the elements of the stroller are conventional, and that the second seat attachment and stroller are identical except for the connection mechanisms for attaching the second seat attachment to the stroller. (EX1001 at ¶ 232; EX1063, col. 2:1-20.) POSITA would have known that connectors for facing the same seat both forward and backward on a stroller are conventional, well-known, and easy to implement. (EX1001 at ¶ 232; EX1063, col. 2:1-20.) Accordingly, to the extent that Stopp doesn't expressly teach or disclose a second seat that can be releasably connected in a forward or backward position, POSITA would have been motivated to modify the seats, second seat attachment, and/or stroller of Stopp to use releasable connections that permit a seat to face both forward and backward because POSITA would have known that such functionality

is convenient for the user, can provide a passenger of the stroller with various views which is enriching, and can permit the user of the stroller to selectively position the passenger as desired, from an orientation in which the passenger is facing forward away from the user or facing rearward and towards the user, for example to see the passenger and thereby monitor the passenger. (EX1001 at ¶ 232; EX1063, col. 1:8-25.) Such a modification would accordingly have been well-within POSITA's skill and would have been obvious. (EX1001 at ¶ 232; EX1063, col. 2:1-20.)



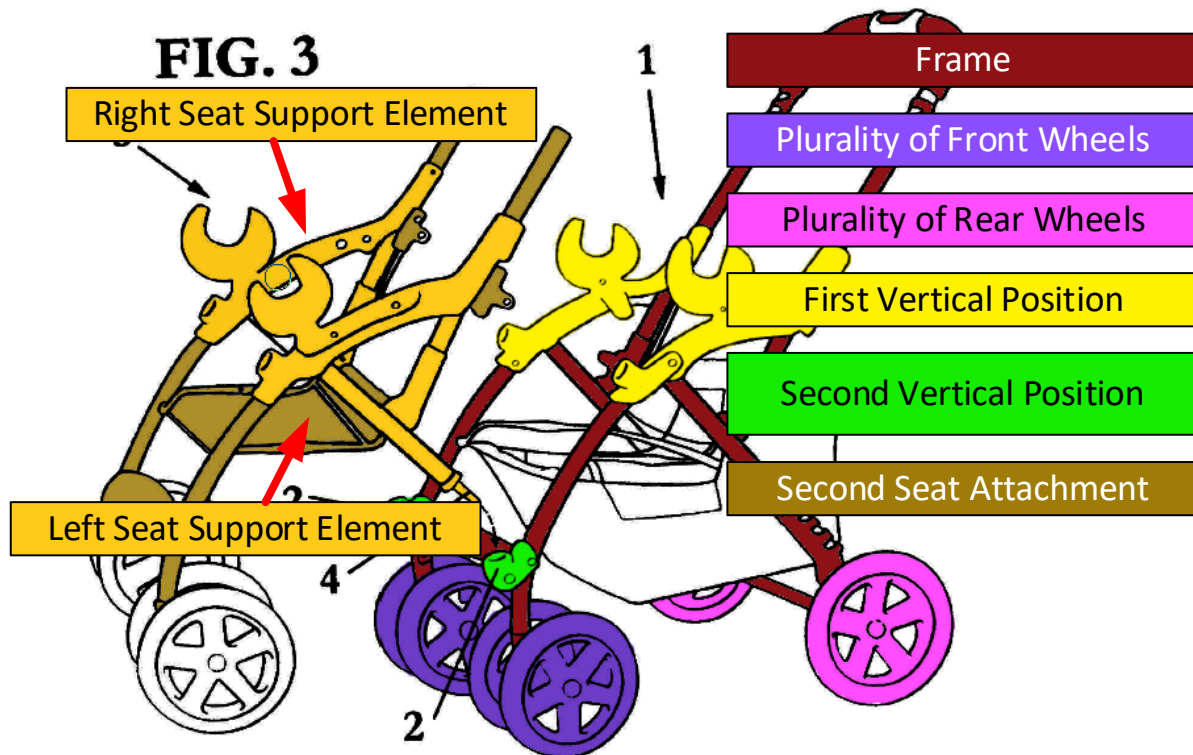
(EX1063, FIG. 5, 6.)

Accordingly, Stopp discloses or renders obvious limitations [1(e)]-[1(f)].

(EX1001 at ¶ 234.)

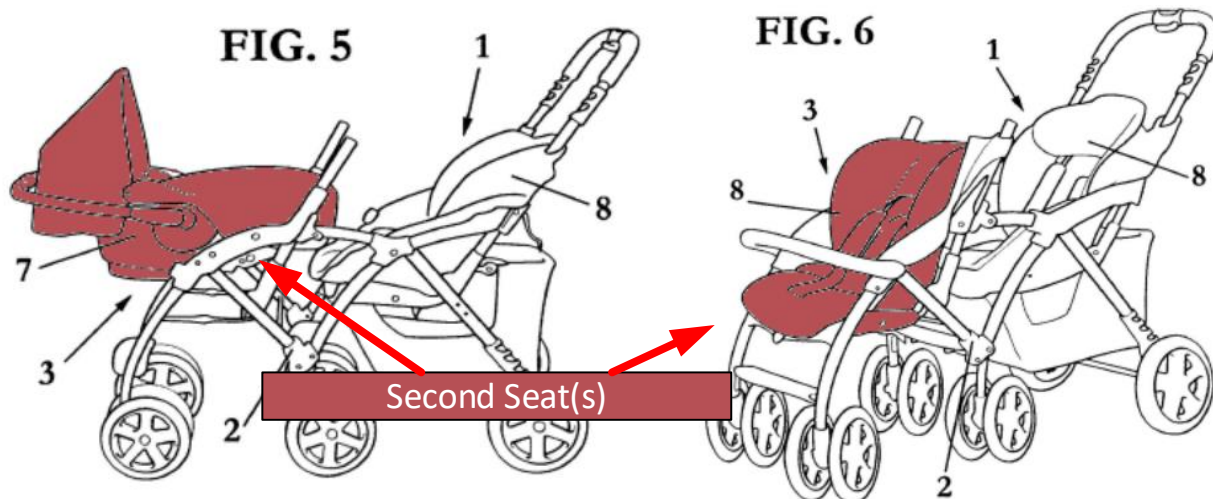
d) [1(g)]-[1(h)]

Stopp's stroller system has left-right symmetry. (EX1001 at ¶ 235; EX1063, col. 2:1-30; FIG. 1, 3, 5.) As shown in FIG. 3 below, the right side of Stopp's seat attachment mirrors all the features discussed above that the left side possesses. (EX1001 at ¶ 235; EX1063, col. 2:1-30; FIG. 1, 3, 5.) Therefore, Stopp discloses or, alternatively, renders obvious the right-sided features recited in [1(g)-(h)], for the same reasons discussed above. (EX1001 at ¶ 235.)



(EX1063, FIG. 3.)

Additionally, as shown in FIGS. 5-6, the seat is between the left and right seat connectors. (EX1001 at ¶ 236; EX1063, FIGS. 5, 6.)

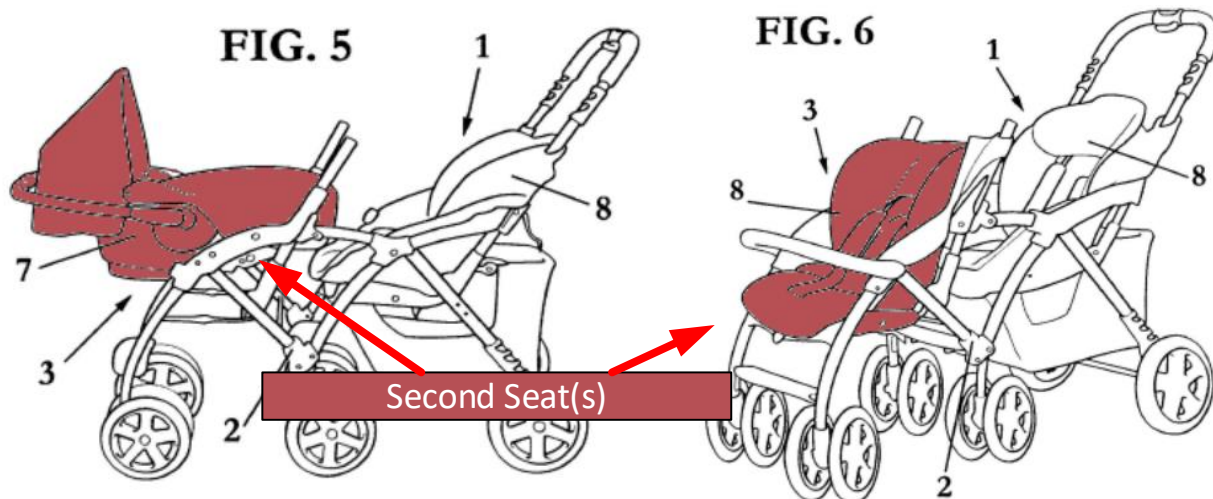


(EX1063, FIG. 5, 6.)

Therefore, Stopp discloses limitations [1(g)]-[1(h)] or, alternatively, renders them obvious. (EX1001 at ¶ 237.)

e) [1(i)]

As explained above, FIGS. 5 and 6 show the seats are releasable and show a second seat releasably connected to the left and right seat connectors. (EX1001 at ¶ 238.) The seat is configured to carry an infant, and the stroller can carry two children simultaneously. (EX1001 at ¶ 238; EX1063, col. 2:1-34.)



(EX1063, FIG. 5, 6.)

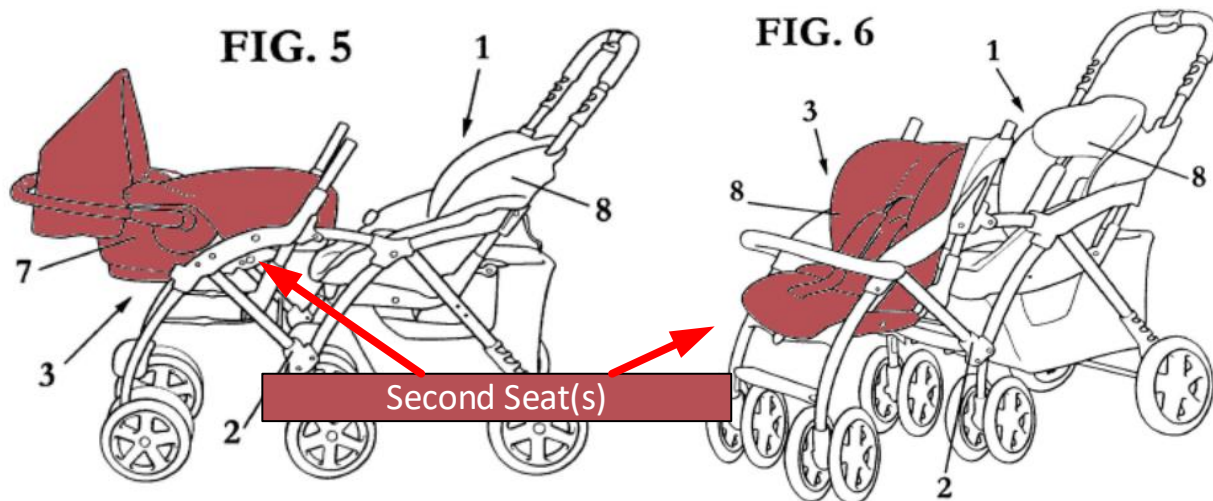
Therefore, Stopp discloses or renders obvious limitation [1(i)]. (EX1001 at ¶ 238.)

B. Claim 2

Stopp discloses that the second seat may be a bassinet or a stroller seat as illustrated in FIG.s 5 and 6. (EX1001 at ¶ 240; EX1063, col. 2:40-45, FIGS. 5, 6). Stopp further discloses that the stroller can use various other seats and carrycots, as examples. (EX1001 at ¶ 240; EX1063, col. 2:40-45, FIGS. 5, 6.)

Furthermore, Stopp teaches that the strollers are suitable for use with any conventional type of infant seat. (EX1001 at ¶ 241; EX1063, col. 2:1-20, col. 2:40-47.) A person of skill in the art would have understood conventional stroller seats to include any of the types of stroller seat of claim 2 and would have understood that any of those seat types could be used. (EX1001 at ¶ 241; EX1063, col. 2:1-20,

col. 2:40-47.) POSITA would have had a reasonable expectation of success using one of the seat types of claim 2 in conjunction with Stopp because using a conventional seat is straight-forward and easy for POSITA to accomplish. (EX1001 at ¶ 241; EX1063, col. 2:1-20, col. 2:40-47.)



(EX1063, FIG. 5, 6.)

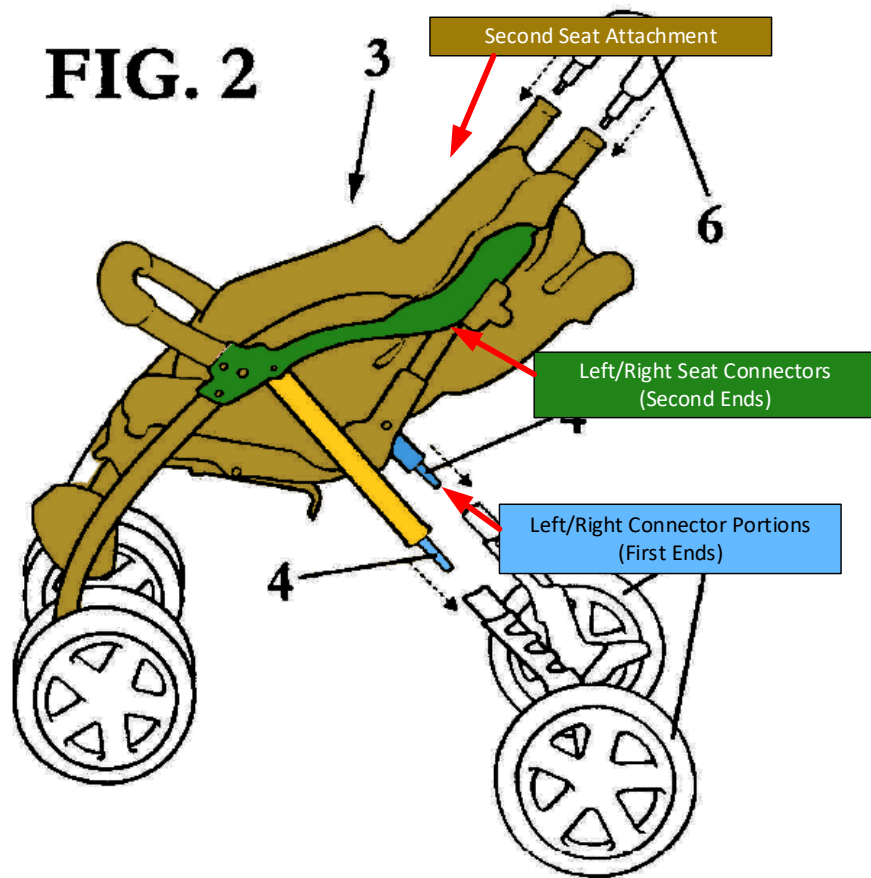
Accordingly, Stopp discloses or renders obvious claim 2. (EX1001 at ¶ 243.)

C. Claims 3-5

Stopp discloses the additional limitations of claims 3-5, including that each of the left and right seat elements has a first end and second end; that the first end comprises a connector portion and is releasably connected to the stroller frame; and that the second end comprises the seat connector and is releasably connected to the second seat. (EX 1063, FIGS. 2-3, 5-6). For example Stopp discloses that each attachment portion (left/right seat elements) includes first and second ends, and

discloses that the first end (the connector portion) is capable of connecting to the stroller frame, and that the second end (the left/right seat connector) is capable of releasably connecting and does releasably connect to the second seat. (EX1001 at ¶ 244-49; EX1063, col. 2:1-30, FIGS. 1-3.) FIGS. 3, 5, and 6 show the stroller without seats and with seats of different types, which teaches the removability of the seats. (EX1001 at ¶ 244-49; EX1063, FIGS. 3-5.)

Accordingly, Stopp discloses or renders obvious the additional limitations of claims 3-5. (EX1001 at ¶ 244-49.)



(EX1063, FIG. 2.)

D. Claim 6

Stopp discloses a seat attachment having connector portions that reversibly connect to the stroller with friction fittings and/or interference fits, as depicted in FIG.s 3-4. (EX1001 at ¶ 250; EX1063, col. 2:24-31). 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. (EX1001 at ¶ 250; EX1063, col. 2:1-20, col. 2:24-31). 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 ‘550 Patent. (EX1001 at ¶ 250; EX1063, col. 2:1-20, col. 2:24-31.)

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 ¶ 251; EX1063, col. 2:1-20, col. 2:24-31.) 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 ¶

251; EX1063, col. 2:1-20, col. 2:24-31.) POSITA would have reasonably expected success because the modifications to Stopp are conventional, straightforward, and well-within POSITA's skill. (EX1001 at ¶ 251; EX1063, col. 2:1-20, col. 2:24-31.)

Accordingly, Stopp discloses, or alternatively renders obvious, the subject matter of claim 6. (EX1001 at ¶ 252.)

X. GROUND 4 – STOPP IN VIEW OF CHEN AND SWEENEY

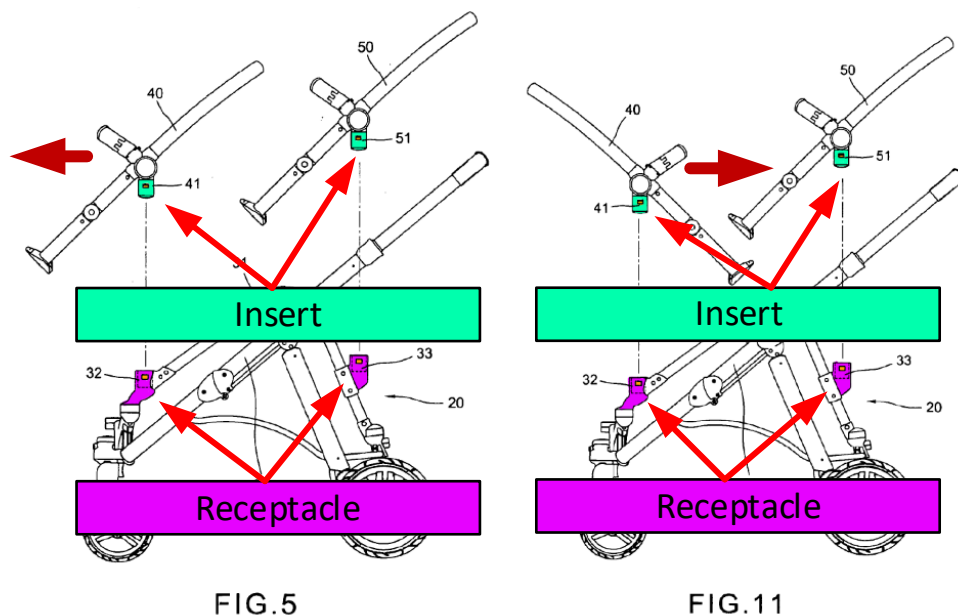
Claims 1-6 are obvious in view of Stopp, as explained with respect to Ground 3. (*Supra*, §§ IX(A)-(F).) However, if the PO argues that Stopp fails to disclose one or more limitations of claims 1-6, then Stopp combined with Chen and/or Sweeney render these claims obvious. Furthermore, combination of Stopp, Chen, and Sweeney render claim 7 obvious.

A. Claim 1

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 ¶ 255.) Chen discloses receptacles (32, 33) for a stroller into which inserts (41, 51) for seats can be releasably inserted. (EX1001 at ¶ 256; EX1065, ¶¶ 5-8, 24.) The inserts and receptacles permit the seat to face forward or backward. (EX1001 at ¶ 256; EX1065, ¶¶ 5-8, ¶¶ 24, 26, FIGS. 5 & 11.) Sweeney discloses a height adjustable rear seat for a stroller or other infant carrying device. (EX1001 at ¶ 256; EX1067, col. 4:50-67, col. 5:1-9.) Sweeney discloses an embodiment wherein the seat has channels that are coupled to the frame, and a locking mechanism permits the seat to move up and down and be secured in place at a desired position on the frame. (EX1001 at ¶ 256; EX1067, col. 4:50-67, col. 5:1-8.) Sweeney also discloses other embodiments. (EX1001 at ¶ 256; EX1067, col. 4:50-67, col. 5:1-8.)

To the extent that PO argues that Stopp's seat support elements do not already releasably connect a seat in either a forward or backward position, POSITA would have been motivated to modify Stopp's seat support elements to releasably connect a seat in either a forward or backward position, as taught by Chen. (EX1001 at ¶ 257; EX1065, ¶¶ 5-6, 24.) POSITA would have been motivated to modify Stopp's seat support elements as taught by Chen because POSITA would have known that it is desirable to use releasable 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. (EX1001 at ¶ 257; EX1065, ¶¶ 5-6, 24.)

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 ¶ 258.)



(EX1065, FIG. 5, 11.)

To the extent that PO argues that Stopp does not disclose the front (second) seat being positioned at a second vertical position substantially below the first vertical position, POSITA would have been motivated to modify Stopp's seats to place the front (second) seat at a second vertical position substantially below the first vertical position of the first seat, as taught by Chen and Sweeney. (EX1001 at ¶ 259, 277-281.)

POSITA would have been motivated to modify Stopp's seats as taught by Chen because Chen teaches that it is desirable to place the rear seat higher than the front seat and ensure that the distance between the seats is long enough because this prevents interference between the two seats, which POSITA would have

known is beneficial for preventing difficulty or inconvenience operating the seats and stroller. (EX1001 at ¶ 260; EX1065, ¶ 26.)

POSITA would have been motivated to modify Stopp's seats as taught by Sweeney because Sweeney teaches that it is desirable to make the rear seat height-adjustable so that the rear seat can be moved up and down, thereby providing the child in the rear seat with a view over the front seat, which POSITA would have known is beneficial for the child in the rear seat. (EX1001 at ¶ 261, 263; EX1067, col. 2:26-37.) Specifically, Sweeney discloses an embodiment wherein the seat has channels that are coupled to the frame, and a locking mechanism permits the seat to move up and down and be secured in place at a desired position on the frame. (EX1001 at ¶ 263; EX1067, col. 4:50-67, col. 5:1-9.)

POSITA would have had a reasonable expectation of success combining Stopp with Sweeney and Chen because each reference discloses stroller systems that use conventional design components, and because integrating Sweeney's and Chen's components and functionality into Stopp would have been straight-forward use of known components well-within POSITA's skill. (EX1001 at ¶ 264.)

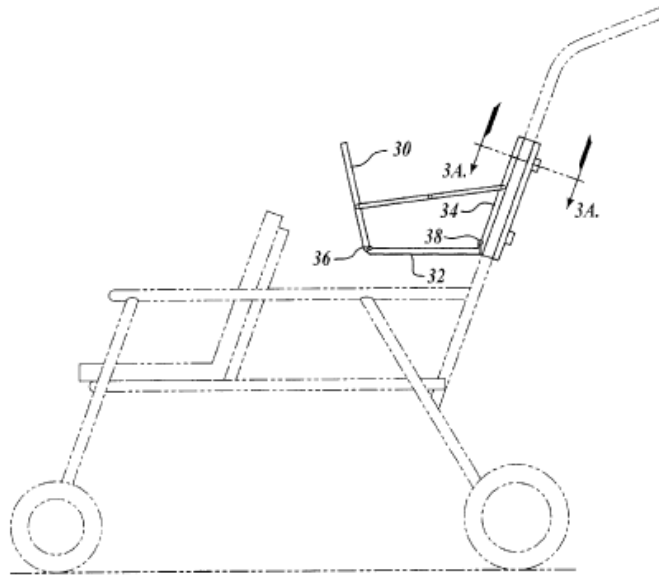


Fig. 2A.

(EX1067, FIG. 2A.)

Accordingly, POSITA would have modified the stroller of Stopp to make it suitably long (as taught by Chen) to prevent interference between the front and rear seat while supporting the sliding seat of Sweeney. (EX1001, ¶ 277-281.)

Stopp discloses or renders obvious the elements of claim 1 for the same reasons as discussed *supra* § IX(A). (EX1001 at ¶ 265.)

The combination of Stopp with Chen and Sweeney as established above in the discussion of this claim also discloses, with respect to elements [1f] and [1h] of this claim, a stroller with left and right seat support elements that are capable of releasably connecting a seat facing either forward or backward because the

combination of Stopp with Chen and Sweeney incorporates Chen's forward and rear-facing functionality into Stopp. (EX1001 at ¶ 266; EX1065, ¶¶ 5-8, 24.) With respect to elements [1c] and [1d] the same combination of Stopp with Chen and Sweeney discloses a stroller with the second seat coupled to the stroller frame at a second vertical position substantially below the first vertical position because the combination of Stopp with Chen and Sweeney incorporates Sweeney's and Chen's higher rear seat design that is coupled to the frame at a first vertical position substantially above the front seat and wherein the front seat is coupled to the frame at a second vertical position substantially below the rear seat and the first vertical position. (EX1001 at ¶ 266; EX1065, ¶ 26; EX.1067, col. 2:26-37, col. 4:50-67, col. 5:1-9.)

Accordingly, Stopp in view of Chen and Sweeney discloses or renders obvious all the limitations of claim 1. (EX1001 at ¶ 267.)

B. Claims 2-6

Stopp in view of Chen and Sweeney discloses and/or renders obvious claims 2-6 for the same reasons that Stopp discloses and/or renders obvious claims 2-6, as discussed *supra*, § IX(B)-(E). (EX1001 at ¶ 268-273.)

Furthermore, Chen discloses claim 2 because Chen discloses that two the seats may be plugged into the frame of the stroller, necessarily requiring that the

seats at least be stroller seats (as they are seats for a stroller). (EX1001 at ¶ 268-273; EX1065, ¶ 8.)

d. Claim 7

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 ¶ 274.) Chen discloses receptacles (32, 33) for a stroller into which inserts (41, 51) for seats can be releasably inserted. (EX1001 at ¶ 274; EX1065, ¶¶ 5-8, 24, FIGS. 5, 11.) The inserts and receptacles permit the seat to face forward or backward. (EX1001 at ¶ 274; EX1065, ¶¶ 5-8, 24, FIGS. 5, 11.) Sweeney discloses a height adjustable rear seat for a stroller or other infant carrying device. (EX1001 at ¶ 274; EX1067, col. 4:50-67, col. 5:1-9.) Sweeney discloses an embodiment wherein the seat has channels that are coupled to the frame, and a locking mechanism permits the seat to move up and down and be secured in place at a desired position on the frame. (EX1001 at ¶ 274; EX1067, col. 4:50-67, col. 5:1-9.) Sweeney also discloses other embodiments. (EX1001 at ¶ 274; EX1067, col. 4:50-67, col. 5:1-9.)

To the extent that PO argues that Stopp's seat support elements do not already releasably connect a seat in either a forward or backward position, POSITA would have been motivated to modify Stopp's seat support elements to releasably connect a seat in either a forward or backward position, as taught by

Chen. (EX1001 at ¶ 275; EX1065, ¶¶ 5-6, 24.) POSITA would have been motivated to modify Stopp's seat support elements as taught by Chen because POSITA would have known that it is desirable to use releasable (or releasable) 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 as desired. (EX1001 at ¶ 275; EX1065, ¶¶ 5-6.)

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 ¶ 276.)

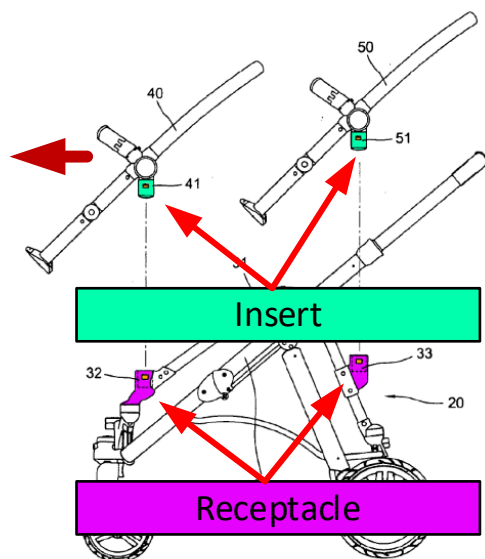


FIG. 5

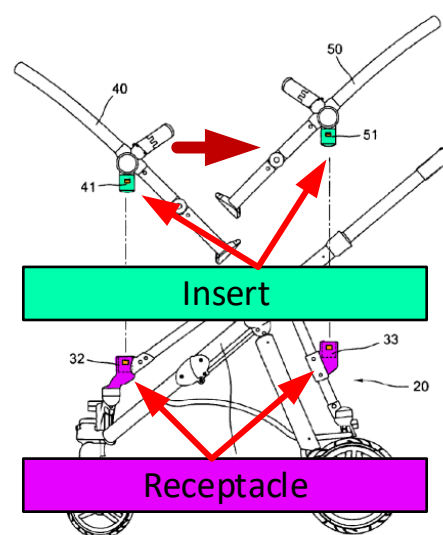


FIG. 11

(EX1063, FIG. 5, 11.)

To the extent that PO argues that does not disclose the front (second) seat being positioned at a second vertical position substantially below the first vertical position, POSITA would have been motivated to modify Stopp's seats to place the front (second) seat at a second vertical position substantially below the first vertical position of the first seat, as taught by Chen and Sweeney. (EX1001 at ¶ 277, 280; EX1065, ¶¶ 26; EX1067, col. 2:26-37.)

POSITA would have been motivated to modify Stopp's seats as taught by Chen because Chen teaches that it is desirable to place the rear seat higher than the front seat and ensure that the distance between the seats is long enough because this prevents interference between the two seats, which POSITA would have known is beneficial for preventing difficulty or inconvenience operating the seats and stroller. (EX1001 at ¶ 278; EX1065, ¶¶ 26.)

POSITA would have been motivated to modify Stopp's seats as taught by Sweeney because Sweeney teaches that it is desirable to make the rear seat height-adjustable so that the rear seat can be moved up and down, thereby providing the child in the rear seat with a view over the front seat, which POSITA would have known is beneficial for the child in the rear seat. (EX1001 at ¶ 261, 281; EX1067, col. 2:26-37.) Specifically, Sweeney discloses an embodiment wherein the seat has channels that are coupled to the frame, and a locking mechanism permits the seat

to move up and down and be secured in place at a desired position on the frame.

(EX1001 at ¶ 281; EX1067, col. 4:50-67, col. 5:1-9.)

POSITA would have had a reasonable expectation of success combining Stopp with Sweeney and Chen because each reference discloses stroller systems that use conventional design components, and because integrating Sweeney's and Chen's components and functionality into Stopp would have been straight-forward use of known components well-within POSITA's skill. (EX1001 at ¶ 282.)

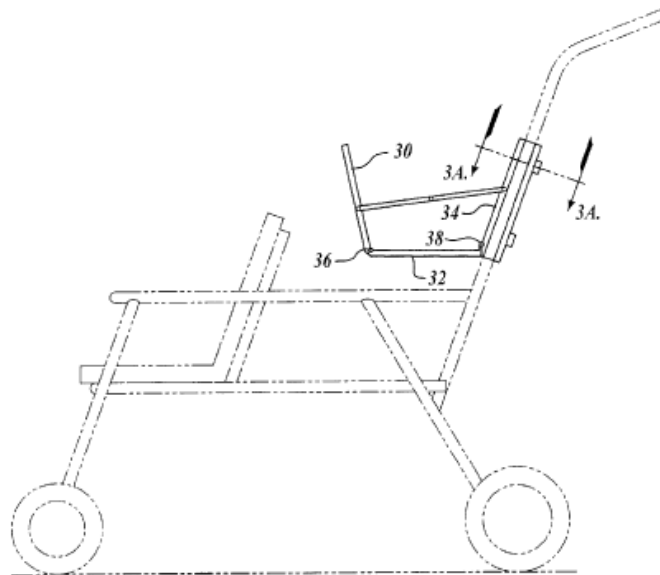


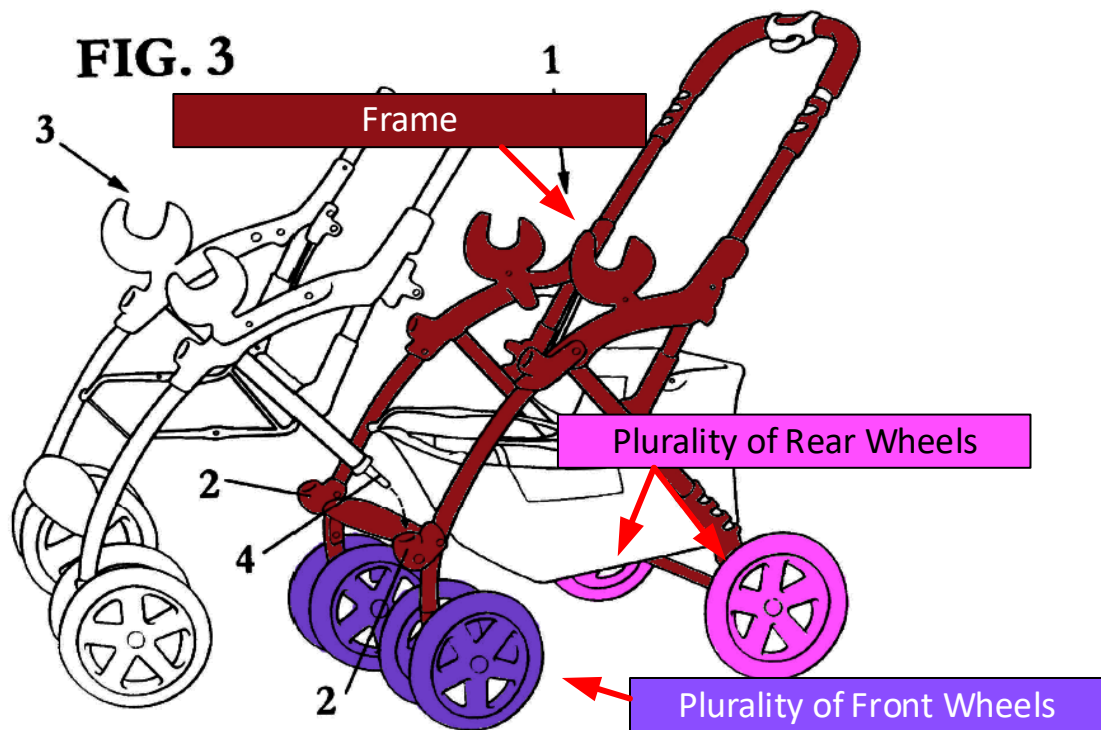
Fig. 2A.

(EX1067, FIG. 2A.)

Accordingly, POSITA would have modified the stroller of Stopp to make it suitably long (as taught by Chen) to prevent interference between the front and rear seat while supporting the sliding seat of Sweeney. (EX1001, ¶ 277-281.)

a) [7(Pre)]-[7(c)]

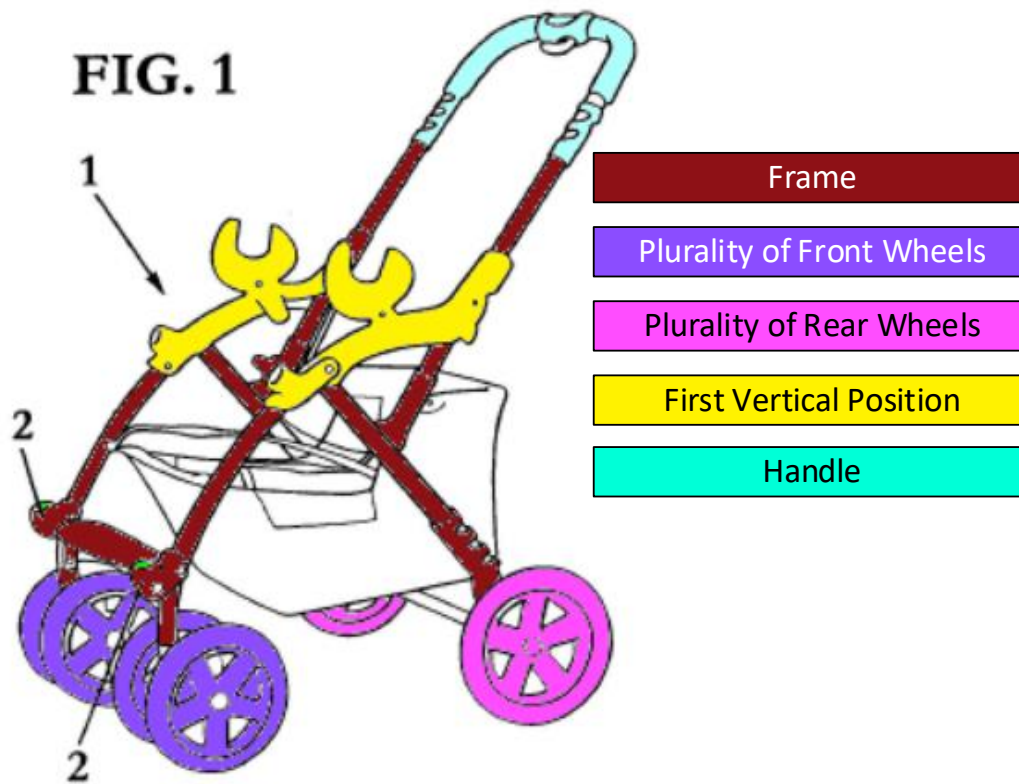
FIG.s 3 and 5 of Stopp illustrate a stroller and a second seat attachment for a stroller. (EX1001 at ¶ 283; EX1063, col.2:1-30, FIGS. 3, 5.) FIG.s 5 and 6 show releasable seats attached to both the stroller and the seat attachment. (EX1001 at ¶ 283; EX1063, FIGS. 5, 6.) FIG. 1 shows that the stroller has a frame, two rear wheels, and two front wheels. (EX1001 at ¶ 283; EX1063, FIG. 1.)

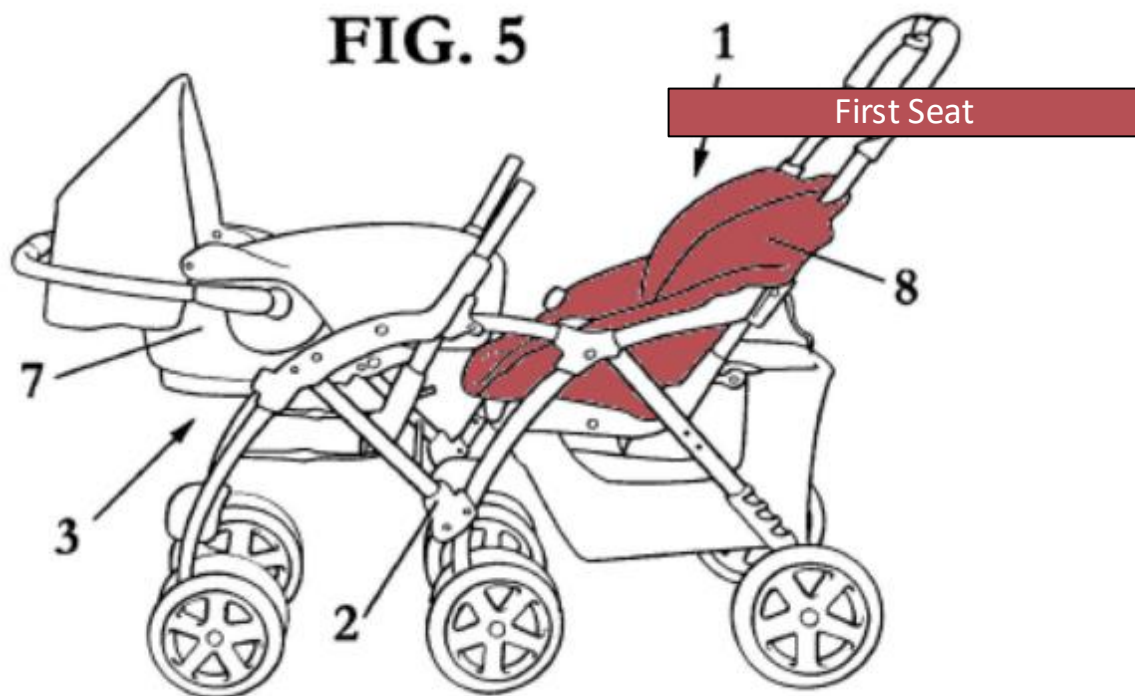


(EX1063, FIG. 3.)

As shown in FIG. 3, the stroller of Stopp includes a first seat (the rear seat) that is coupled to the stroller frame at a first vertical position closer to the handle of the stroller. (EX1001 at ¶ 284; EX1063, col 2:1-30, FIG. 3.) The first seat of Stopp

is configured to hold a first child in the stroller. (EX1001 at ¶ 284; EX1063, col 2:1-30, FIG. 3.)





(EX1063, FIG. 1, 5.)

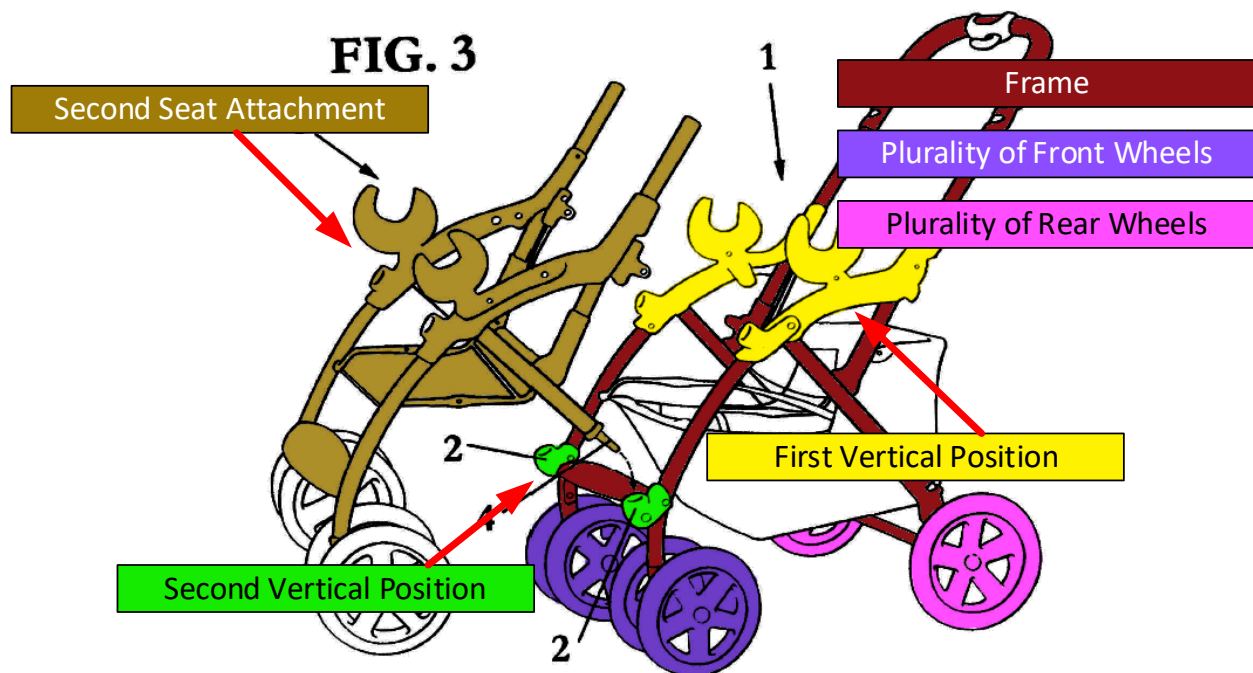
Accordingly, Stopp discloses limitations [7(Pre)]-[7(c)]. (EX1001 at ¶ 287.)

b) [7(d)]

FIG. 3 of Stopp illustrates a second seat attachment for a stroller. (EX1001 at ¶ 288; EX1063, col. 2:1-34, FIGS. 3-6.) FIG.s 5-6 show releasable seats attached to the second seat attachment. (EX1001 at ¶ 288; EX1063, FIGS. 5, 6.) Therefore, FIG.s 1, 5, and 6 illustrate that the second (front) seat of Stopp is releasable from the second seat attachment. (EX1001 at ¶ 288; EX1063, FIGS. 1, 5, 6.)

FIG. 3 further shows the attachment frame members (located at the second vertical position) that receive the connector portions of the second seat attachment. (EX1001 at ¶ 289; EX1069, col. 2:1-34, FIGS. 1-3.) Stopp indicates that a

retention mechanism may be used to secure the second seat attachment to the sockets and the frame. (EX1001 at ¶ 289; EX1069, col. 2:24-31.) Furthermore, FIG. 3 also illustrates that the second vertical position is closer to front wheels than to the handle, and closer to the front wheels than the first vertical position. (EX1001 at ¶ 289; EX1069, col. 2:24-31.)



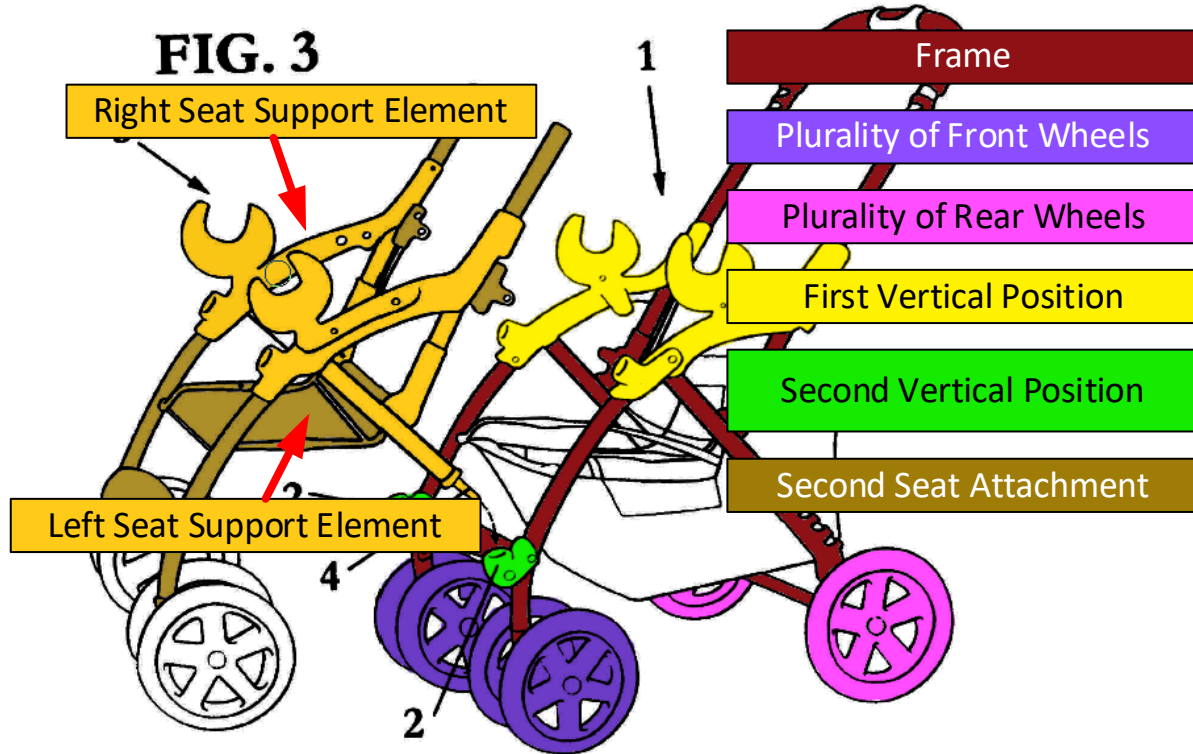
(EX1063, FIG. 3.)

Accordingly, Stopp discloses limitation [7(d)]. (EX1001 at ¶ 291.)

c) [7(e)]-[7(f)]

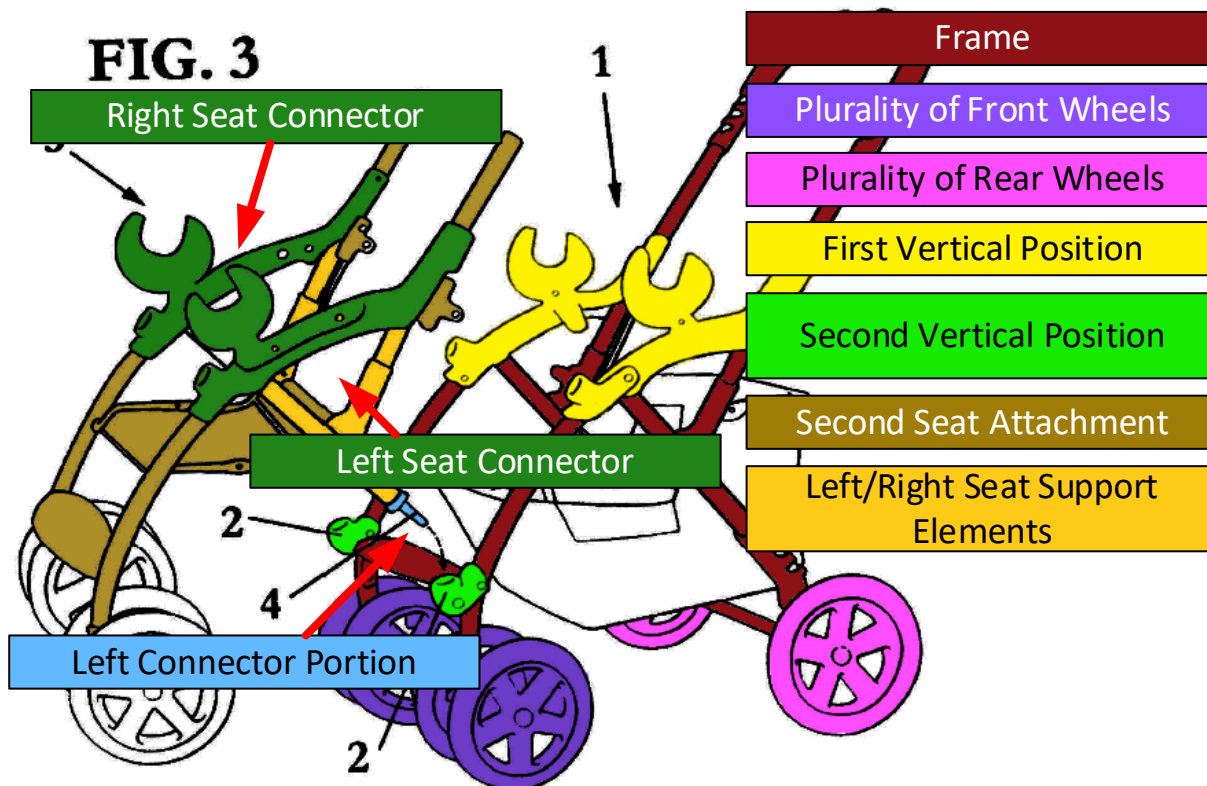
Stopp discloses separate left and right seat support elements releasably receivable in the frame and supported by the left and right-side attachment frame

members which allow the stroller to be converted into a double stroller. (EX1001 at ¶ 292; EX1063, col. 2:1-34, FIG. 3.)



(EX1063, FIG. 3.)

Stopp discloses that each seat support element comprises a connector portion that releasably connects to an attachment frame member, and a respective (left/right) seat connector that releasably connects a second stroller seat in both forward and backward positions. (EX1001 at ¶ 293; EX1063, col. 2:1-34, FIG. 3.)



(EX1063, FIG. 3.)

The respective connector portions (rods) insert into respective attachment frame members (sockets) at the second vertical position, and are secured by a retention mechanism. (EX1001 at ¶ 294; EX1063, col. 2:10-34.) FIG. 3 also illustrates that the left seat connector portion is closer to the left front wheel than to the right front wheel, the handle, the first vertical position, the seat connector, and so forth. (EX1001 at ¶ 294; EX1063, col. 2:1-34, FIGS. 3-6.)

The seat connectors are the tops of the attachment portions, engageable, as shown in FIGS. 3, 5 and 6, to a seat. (EX1001 at ¶ 295; EX1063, col. 2:1-34, FIGS. 3-6.) FIGS. 5 and 6 show that the second stroller seat (here, the front seat)

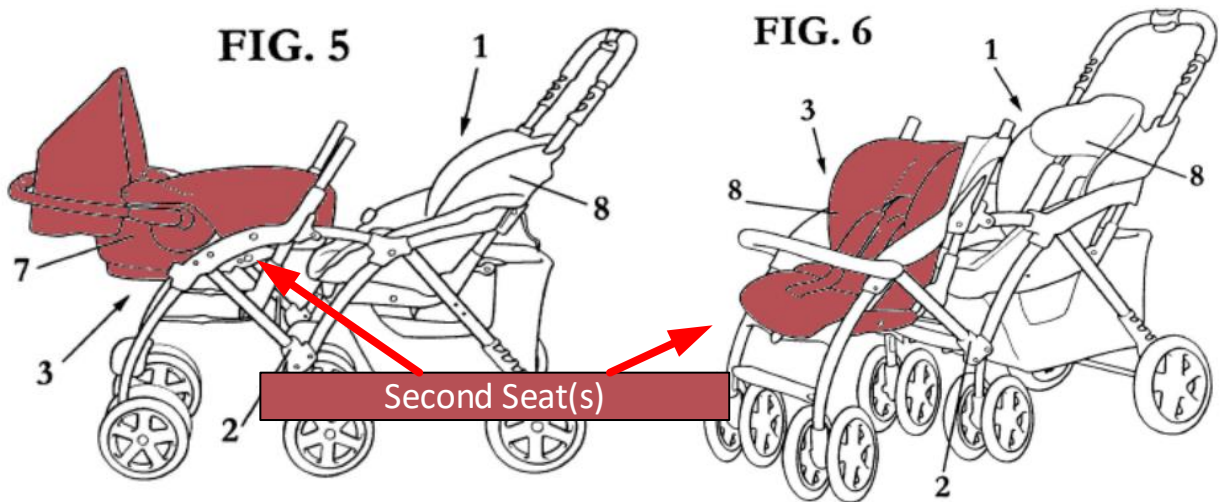
may be connected in either forward facing or rearward facing configurations.

(EX1001 at ¶ 295; EX1063, col. 2:1-34, FIGS. 3-6.)

Stopp's FIG.s show different types of seats being connected to the seat support elements, which a POSITA would have understood to mean that the seats are releasable and that various types of seats can be used with the frame at various times. (EX1001 at ¶ 296; EX1063, col. 2:1-34, FIGS. 3-6.) 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. (EX1001 at ¶ 296; EX1063, col. 2:1-34, FIGS. 3-6.)

Furthermore, Stopp indicates that the elements of the stroller are conventional, and that the second seat attachment and stroller are identical except for the connection mechanisms for attaching the second seat attachment to the stroller. (EX1001 at ¶ 297; EX1063, col. 2:1-34, FIGS. 3-6.) POSITA would have known that connectors for facing the same seat both forward and backward on a stroller are conventional, well-known, and easy to implement. (EX1001 at ¶ 297; EX1063, col. 2:1-34, FIGS. 3-6.) Accordingly, POSITA would have been motivated to modify the seats, second seat attachment, and/or stroller of Stopp to use connections that permit a seat to face both forward and backward because POSITA would have known that such functionality is convenient for the user, can

provide a passenger of the stroller with various views which is enriching, and can permit the user of the stroller to see the passenger and thereby monitor the passenger. (EX1001 at ¶ 297; EX1063, col. 1:8-25.) Such a modification would accordingly have been well-within POSITA's skill and would have been obvious. (EX1001 at ¶ 297; EX1063, col. 2:1-20.)



(EX1063, FIG. 5, 6.)

Accordingly, Stopp discloses or renders obvious limitations [7(e)]-[7(f)].

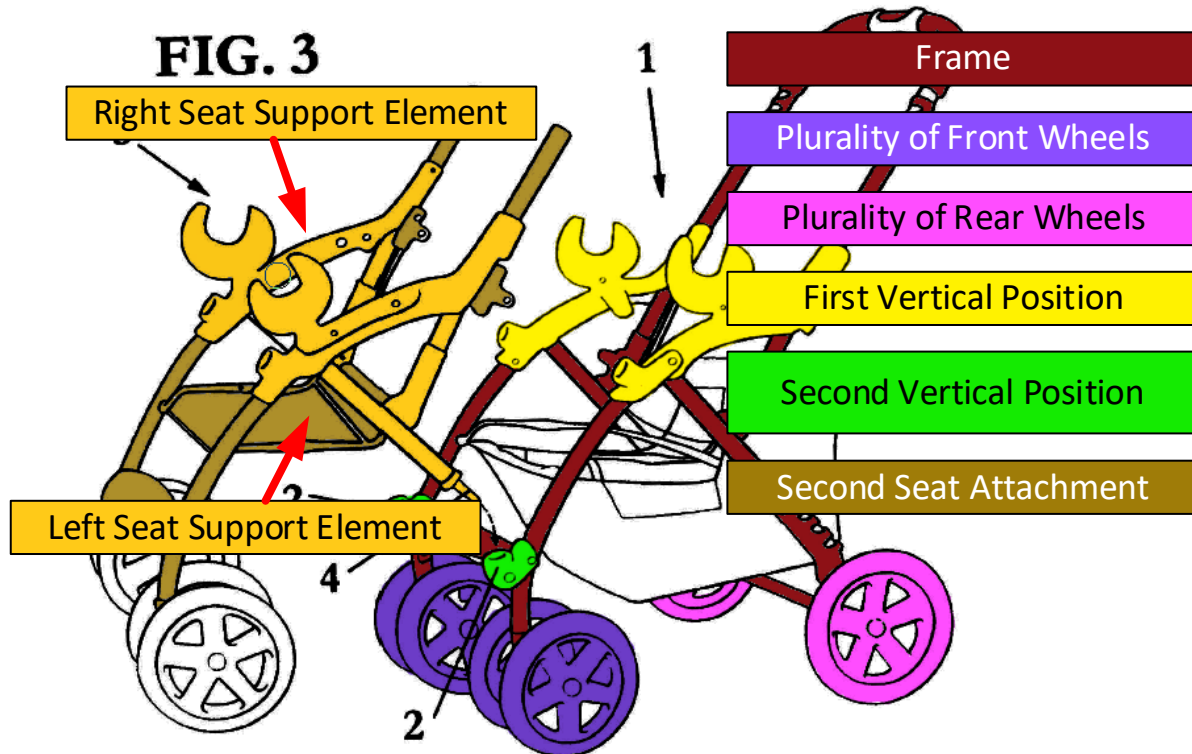
(EX1001 at ¶ 299.)

d) [7(g)]-[7(h)]

Stopp's stroller system has left-right symmetry. (EX1001 at ¶ 300; EX1063, col. 2:1-30, FIGS. 1, 3, 5.) As shown in FIG. 3 below, the right side of Stopp's seat attachment mirrors all the features discussed above that the left side possesses.

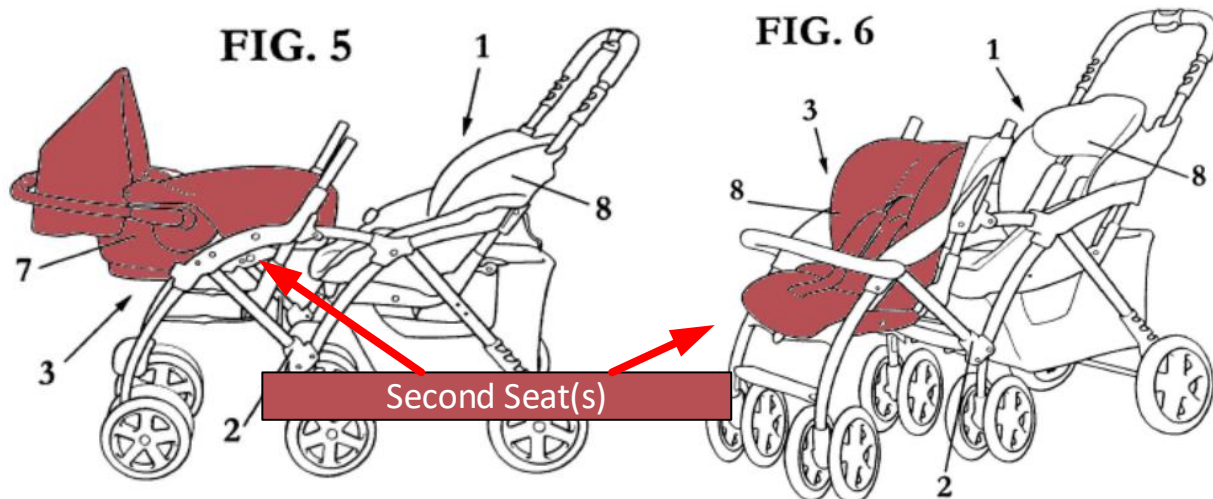
(EX1001 at ¶ 300; EX1063, col. 2:1-30, FIGS. 1, 3, 5.) Therefore, Stopp discloses

or, alternatively, renders obvious the right-sided features recited in [1(g)-(h)], for the same reasons discussed above. (EX1001 at ¶ 300-302; EX1063, col. 2:1-30, FIGS. 1, 3, 5.)



(EX1063, FIG. 3.)

Additionally, as shown in FIGS. 5-6, the seat is between the left and right seat connectors. (EX1001 at ¶ 301; EX1063, FIGS. 5, 6.)

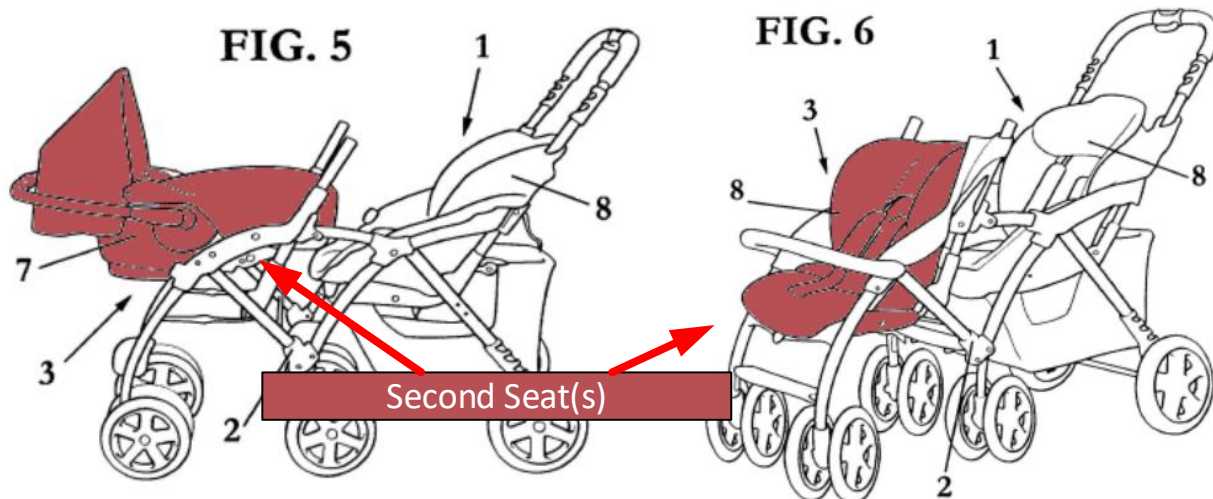


(EX1063, FIG. 5, 6.)

Therefore, Stopp discloses limitations [1(g)]-[1(h)] or, alternatively, renders them obvious. (EX1001 at ¶ 302.)

e) [7(i)]-[7(j)]

As explained above, FIGS. 5 and 6 show the seats are releasable and show a second seat releasably connected to the left and right seat connectors. (EX1001 at ¶ 303.) The seat is configured to carry an infant, and the stroller can carry two children simultaneously. (EX1001 at ¶ 303; EX1063, col. 2:1-34.)



(EX1063, FIG. 5, 6.)

The combination of Stopp with Chen and Sweeney as established above in the discussion of this claim also discloses, with respect to elements [7f] and [7h] of claim 7, a stroller with left and right seat support elements that are capable of releasably connecting a seat facing either forward or backward because the combination of Stopp with Chen and Sweeney incorporates Chen's forward and rear-facing functionality into Stopp. (EX1001 at ¶ 304; EX1065, ¶¶ 5-6, 24.) With respect to elements [7c] and 7[i], the same combination of Stopp with Chen and Sweeney discloses a stroller with the second seat coupled to the stroller frame at a second vertical position substantially below the first vertical position because the combination of Stopp with Chen and Sweeney incorporates Sweeney's and Chen's higher rear seat design that is coupled to the frame at a first vertical position substantially above the front seat and wherein the front seat is coupled to the frame

at a second vertical position substantially below the rear seat and the first vertical position. (EX1001 at ¶ 304; EX1065, ¶ 26; EX1067, col. 2:26-37, col. 4:50-67, col. 5:1-9.)

Accordingly, Stopp in view of Chen and Sweeney discloses or renders obvious all the limitations of claim 7. (EX1001 at ¶305.)

Dated: June 20, 2025

Respectfully Submitted,

/Craig R. Smith/
Craig R. Smith
Registration No. 45,113
Lead Counsel
Lando & Anastasi, LLP
60 State Street
23rd Floor
Boston, MA 02109
617-395-7081
csmith@lalaw.com

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

A courtesy copy was also sent via electronic mail to the following counsel:

John W. Harbin	jharbin@mcciplaw.com
Gregory J. Carlin	gcarlin@mcciplaw.com
Walter Hill Levie III	tlevie@mcciplaw.com
Robert J. Leonard	rleonard@mcciplaw.com
Andrew C. Mayo	amayo@ashbygeddes.com

Date: June 20, 2025

/Craig R. Smith/

Craig R. Smith
Registration No. 45,113
LANDO & ANASTASI, LLP
60 State Street
23rd Floor
Boston, MA
Tel: 617-395-7081
csmith@lalaw.com