

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

EVENFLO COMPANY, INC.,
Petitioner,

v.

BABY JOGGER, LLC
Patent Owner.

U.S. Patent No. 11,731,682
Case No.: IPR2025-01122

U.S. Patent No. 11,577,771
Case No.: IPR2025-01140

REBUTTAL DECLARATION OF DOUGLAS S. PRAIRIE, P.E.

List of Exhibits

Exhibit	Description
EX1001	Declaration of Douglas Prairie
EX1002	U.S. Provisional Patent Application No. 61/119,920
EX1003	U.S. Publication No. 2010/0140902
EX1004	U.S. Patent No. 8,955,869
EX1005	U.S. Patent No. 9,403,550
EX1006	U.S. Provisional Patent Application No. 62/311,224
EX1007	U.S. Patent No. 9,944,305
EX1008	U.S. Patent No. 10,730,543
EX1009	U.S. Patent No. 11,192,568
EX1010	U.S. Patent No. 11,731,682
EX1011	U.S. Patent No. 11,577,771
EX1012	U.S. Patent No. 11,505,231
EX1013	U.S. Patent No. 11,878,729
EX1014	Non-certified File History of U.S. Patent Pub. No. 2010/0140902
EX1015	Non-certified File History of U.S. Patent No. 8,955,869
EX1016	Non-certified File History of U.S. Patent No. 9,403,550
EX1017	Non-certified File History of U.S. Patent No. 9,944,305

EX1018	Non-certified File History of U.S. Patent No. 10,730,543
EX1019	Certified File History of U.S. Patent No. 11,192,568
EX1020	Certified File History of U.S. Patent No. 11,731,682
EX1021	Certified File History of U.S. Patent No. 11,577,771
EX1022	Non-certified File History of U.S. Patent No. 11,505,231
EX1023	Non- certified File History of U.S. Patent No. 11,878,729
EX1024	Certified File History of U.S. Patent Application No. 18/448,417
EX1025	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
EX1026	U.S. Patent No. 405,600
EX1027	U.S. Patent No. 510,355
EX1028	<i>Intentionally left blank</i>
EX1029	U.S. Patent No. 4,191,397
EX1030	U.S. Patent No. 6,513,827
EX1031	Declaration of Hollie Schultz
EX1032	Declaration of Greg Allen
EX1033	U.S. Patent No. 7,641,216
EX1034	U.S. Patent No. 4,398,748
EX1035	U.S. Patent Pub. No. 2008/0238042
EX1036	<i>Intentionally left blank</i>
EX1037	U.S. Patent No. 6,086,087

EX1038	Kolcraft Contours Options Tandem Stroller Instruction Sheet, EXA to Affidavit of Christopher Butler
EX1039	French Patent 2,615,155 and Non-certified English Translation
EX1040	U.S. Patent No. 6,209,892
EX1041	EP 0980810 and Certified Translation
EX1042	U.S. Design Patent No. D514,036
EX1043	Evenflo Take Me Too Manual – Double Stroller/Double Travel System (Oct. 2004)
EX1044	U.S. Patent No. 6,045,145
EX1045	U.S. Patent No. 5,794,951
EX1046	Comparison of First Non-Provisional Specification and '305 CIP Specification
EX1047	U.S. Patent No. 8,882,134
EX1048	US D593,459
EX1049	<i>Intentionally Left Blank</i>
EX1050	PCT/US2011/062669 / WO 2012075157
EX1051	U.S. Patent No. 8,672,341
EX1052	<i>Intentionally Left Blank</i>
EX1053	<i>Intentionally Left Blank</i>
EX1054	WO 2008/040797
EX1055	Baby Jogger, LLC's Opening Claim Construction Brief in Civil Action No. 1:24-cv-11582-ADB
EX1056	Baby Jogger, LLC's Responsive Claim Construction Brief in Civil Action No. 1:24-cv-11582-ADB

EX1057	EXC to Baby Jogger, LLC's Infringement Contentions in Civil Action No. 1:24-cv-11582-ADB
EX1058	Merriam-Webster, Parallel, https://www.merriam-webster.com/dictionary/parallel (last visited Feb. 21, 2025)
EX1059	<i>McGraw-Hill Dictionary of Scientific and Technical Terms</i> (6th ed. 2003), Definition of "parallel"
EX1060	<i>Barron's Dictionary of Mathematics Terms</i> (3d ed. 2009), Definition of "parallel"
EX1061	Baby Jogger, LLC's Second Amended Complaint in Civil Action No. 1:24-cv-00723-GBW
EX1062	Baby Jogger and UPPAbaby's District Court Case Schedule
EX1063	UPPAbaby's Answer and Counterclaims to Baby Jogger's First Amended Complaint
EX1064	Baby Jogger's Answer to UPPAbaby's Counterclaims
EX1065	Baby Jogger's Objections and responses to UPPAbaby's First Set of Interrogatories
EX1066	Markman Hearing Transcript, Baby Jogger, LLC v. Monahan Products, LLC d/b/a/ UPPAbaby; July 17, 2025
EX1067	Baby Jogger's Response in Opposition to Evenflo's Motion to Stay
EX1068	Evenflo's Motion to Stay
EX1069	Mockingbird's Motion to Stay
EX1070	Baby Jogger and Evenflo Joint Letter to the Court
EX1071	Baby Generation (Mockingbird) Letter to the Court
EX1072	Evenflo Pacer Docket Sheet
EX1073	Mockingbird Pacer Docket Sheet

EX1074	Baby Jogger, LLC v. Evenflo Company, Inc. Second Amended Complaint in Civil Action No. 1:24-cv-00723-GBW
EX1075	Baby Jogger, LLC v. Baby Generation, Inc., d/b/a Mockingbird First Amended Complaint in Civil Action No. 1:24-cv-00725 GBW
EX1076	Baby Jogger, LLC v. Monahan Products, LLC d/b/a/ UPPAbaby First Amended Complaint in Civil Action No. 1:24-cv-11582 ADB
EX1077	Docket Navigator Statistics for Judge Allison D. Burroughs
EX1078	2015-2016 Correspondences between Baby Jogger and UPPAbaby
EX1079	Portions of Prosecution History for U.S. Patent Application 13/418,101
EX1080	Evenflo's Opening Brief in Support of Its Motion to Stay
EX1081	Evenflo's Reply Brief Regarding Motion to Stay
EX1082	Second Declaration of Douglas Prairie

I, Douglas S. Prairie, hereby declare as follows:

1. I provided my background, qualifications and opinions pertaining to Petitions for Inter Partes Review, Case Nos. IPR2025-01140 and IPR2025-01122, in Declarations that were filed in those respective proceedings as EX1001.

2. I am making this combined Rebuttal Declaration (“Rebuttal Decl.,” Ex. 1082) at the request of Evenflo Company, Inc. (“Evenflo”) in support of Evenflo’s Reply to Patent Owner’s Response regarding certain factual issues raised in IPR2025-01140 and IPR2025-01122.

3. Specifically, for purposes of this Rebuttal Declaration, I have been asked to analyze the arguments made by Patent Owner in the Responses (PORs), which was Paper 20 in each IPR, along with the declaration of Patent Owner’s expert, Dr. Cameron (“Cameron Decl.,” EX2011). I have also analyzed my deposition transcript (EX2100).

4. I have also reviewed my first declaration (EX1001) for each IPR and the exhibits cited therein.

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

- a. The documents listed in my first declarations, as well as additional patents and documents referenced herein;
- b. The relevant legal standards, including the standard for obviousness provided in *KSR International Co. v. Teleflex, Inc.*, 550

U.S. 398 (2007), and any additional documents cited in the body of this declaration; and

c. My knowledge and experience based upon my work and study in this area as described below.

I. Figure 10 does not provide written description support for “substantially within a plane” as recited in claim 1 of the ’771 Patent

6. Figure 10 depicts a curved stroller frame. A curved stroller frame does not have “foldable support members extending . . . substantially within a plane” as required by claim 1.

7. Dr. Cameron attempts to show that Figure 10 of the 2009 Non-provisional application discloses “substantial in a plane” by drawing a rectangle on top of the illustrated stroller frame. (EX2011, 34.) This is meritless for several reasons. First, Figure 10 does not contradict my opinion that a curved stroller frame does not have “foldable support members extending . . . substantially within a plane.” Second, Figure 10 is a perspective view looking down at the stroller frame. One cannot show that the foldable support members extend in “a plane that runs diagonally from the handle portion towards the front end portion of the frame” using a perspective view looking down from the front. It can only be shown in a side elevation view, which Figure 10 is not.

8. Dr. Cameron’s annotated figure is also highly misleading. In her

annotated figure, the upper tube support frames are not shaded thus signifying that they are above the annotated rectangle and that the annotated rectangle intersects with the upper tube support frames just above the folding mechanisms 16. The annotated rectangle then extends downwardly at an angle and intersects through a middle portion of the right seat attachment adapter 84, which is exploded in the view and placed vertically above the frame by a large distance. Thus, the annotated rectangle is above the foldable support members and does not track their placement. This results in the annotated rectangle covering over the top of the stroller frame and the foldable support members being shaded. But, this is a shadow; the stroller frame is well beneath the annotated rectangle, not extending in it.

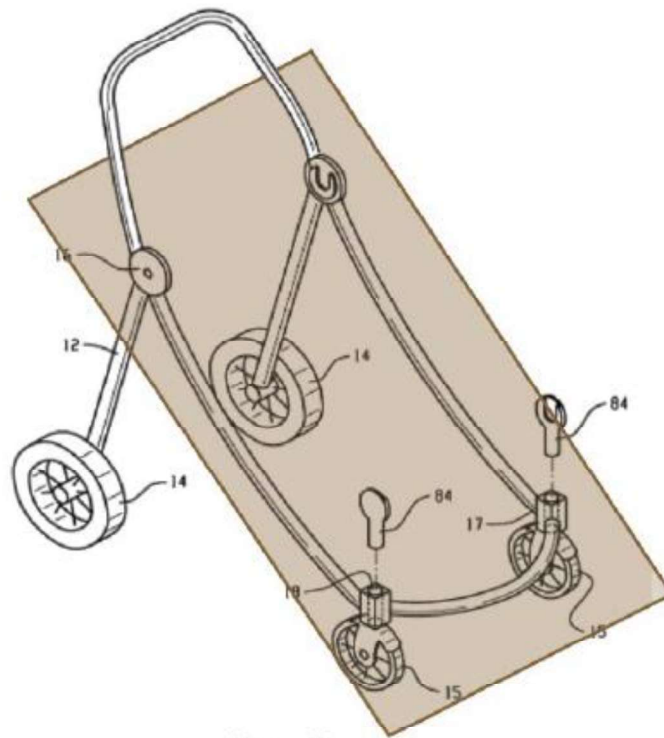


Fig. 10

EX2011, 34

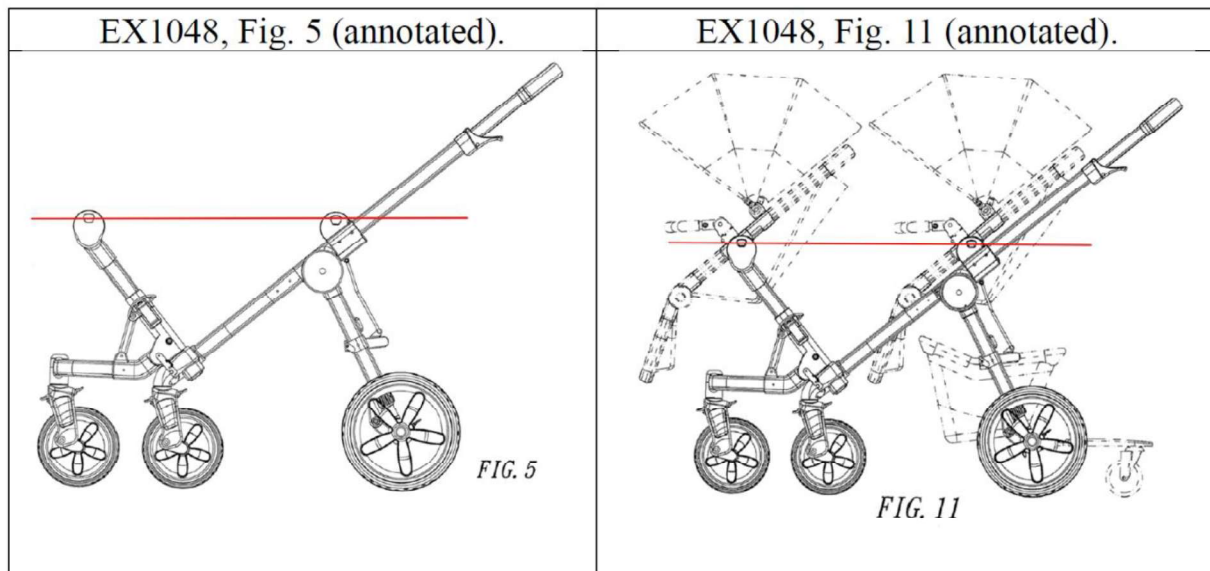
9. Annotated Figure 10 also has inaccuracies in the shading of components. The shading of the folding mechanism 16 is incompatible with the upper tube support frames not being shaded. The illustrated shading could only be true if the folding mechanisms were fully below the upper tube support frames. But, they are not. Therefore, I do not believe that the annotated rectangle is a plane. The shading of the seat support portions 84 is also inaccurate. The left seat support portion 84 is shown fully shaded whereas the right seat support portion 84 is shown partially shaded, indicating that it is being intersected with the annotated rectangle. If the annotated rectangle were indeed a plane, this would not occur.

II. Ground 2 of '682 Patent – Liao discloses limitation [1.8] wherein the first seat and the second seat, when connected to the frame, are arranged in an inline descending configuration along the stroller frame

10. In my first declaration for the '682 Patent, I opined that Figure 10 of Liao disclosed claim limitation [1.8]. (EX1001, ¶¶385-387.)

11. Dr. Cameron, in her declaration, opined that I am incorrect, citing Figures 5 and 11 of Liao, which are not figures that I relied upon in my analysis. Therefore, Dr. Cameron did not rebut my opinion that Figure 10 of Liao discloses limitation [1.8].

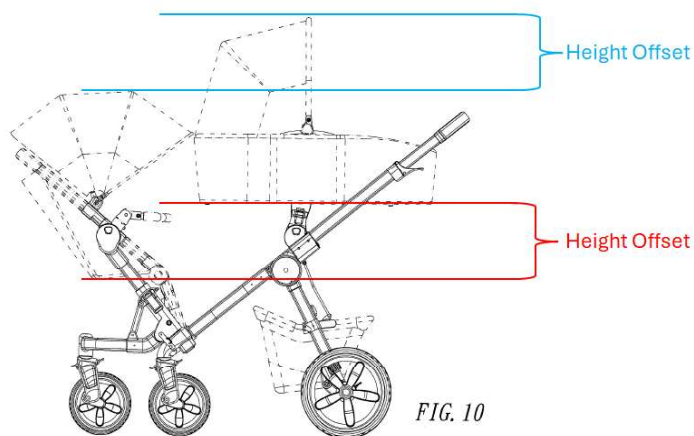
12. I have been informed by counsel that Patent Owner has argued that the correct location for measuring the claimed “inline and descending configuration” is “where the seat attaches to its seat attachment adapter.” (POR, 8) Based on this claim construction, Patent Owner alleges that both seats of Liao are at the same height:



POR, pg. 34; EX2011, pg. 41

13. First, I disagree that claim limitation [1.8] claims the seat connection points having an inline and descending configuration. As I stated in my deposition, Claim limitation [1.8] recites that the *seats* are inline and descending. (EX2100, 152:6-10, see also 149:13-22, 152:14-17.) I maintain what I stated in my deposition that a POSITA would look at the relative positioning of the *seats* when analyzing claim limitation [1.8].

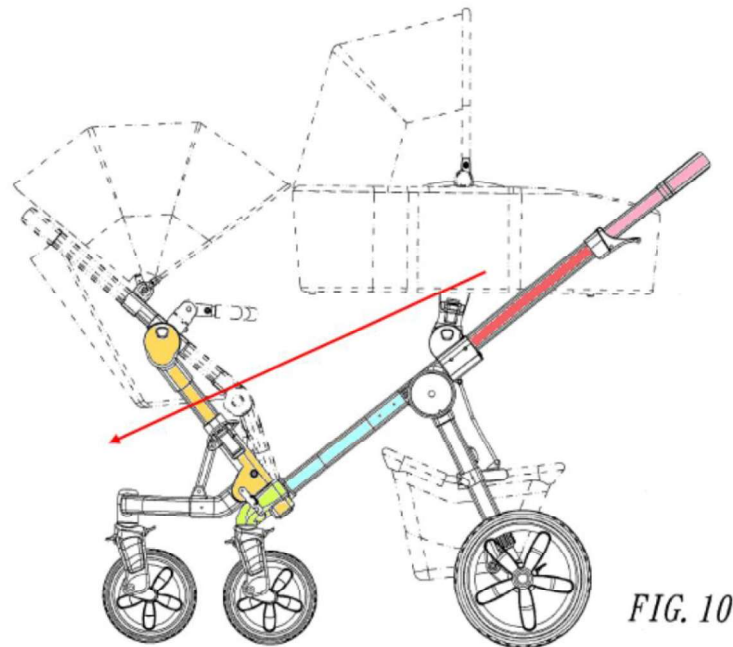
14. Figure 10, which I relied on in my original declaration, illustrates a height or vertical offset between the upper bassinet seat and the lower stroller seat. This offset is visually evident regardless of whether one measures from the bottom of both seats (shown in red) or the top of both seats (shown in blue).



EX1048, FIG. 10

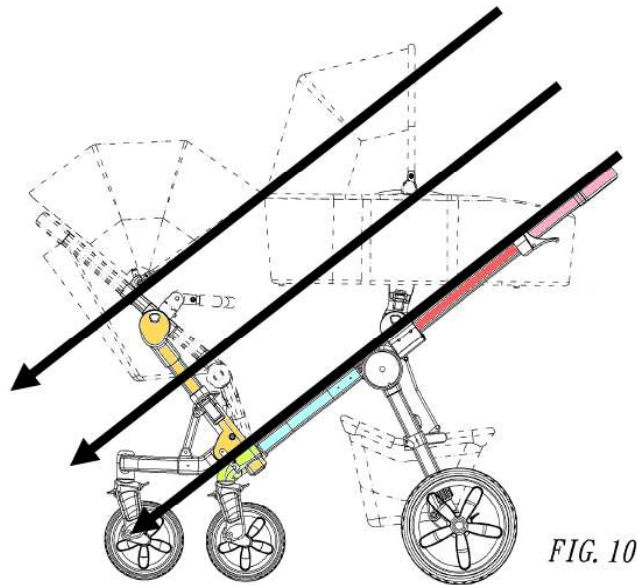
15. Figure 10 of Liao discloses, without modification, the claimed requirement that “the first seat and the second seat, when connected to the frame, are arranged in an inline descending configuration along the stroller frame.” The illustrated bassinet seat is positioned vertically above, and longitudinally rearward of, the lower front infant seat. That vertical and longitudinal offset establishes a descending in-line seating relationship along the stroller frame when viewed in the direction of the frame’s length. The arrangement is analogous to a tiered seating geometry (i.e., “stadium seating”), in which the rear seating position is elevated relative to the forward seating position while remaining generally aligned. Accordingly, a POSITA reviewing Figure 10 would understand that the two seats are arranged in an “inline descending configuration.”

16. In my first declaration I included the below annotated figure to illustrate how Liao disclosed limitation [1.8].



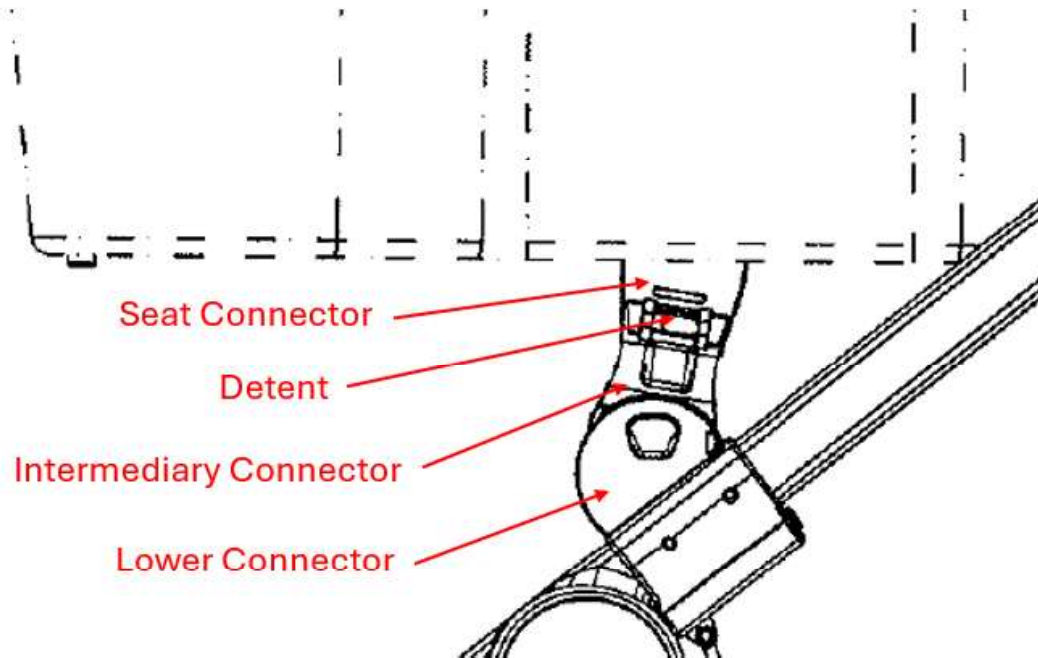
EX1048, Liao, Fig. 10 (Annotated) (EX1001, ¶385)

17. As I made clear in my first declaration, the annotated figure above is only one demonstrative illustrating my opinion: “But no matter how I draw the line, Liao teaches a POSITA an inline and descending configuration of both seats along the stroller frame.” (EX1001, ¶385.) The demonstrative below confirms the point, adding further reference lines through the seats to show that they remain inline and descending regardless of where the line is drawn.



EX1048, FIG. 10 (Annotated)

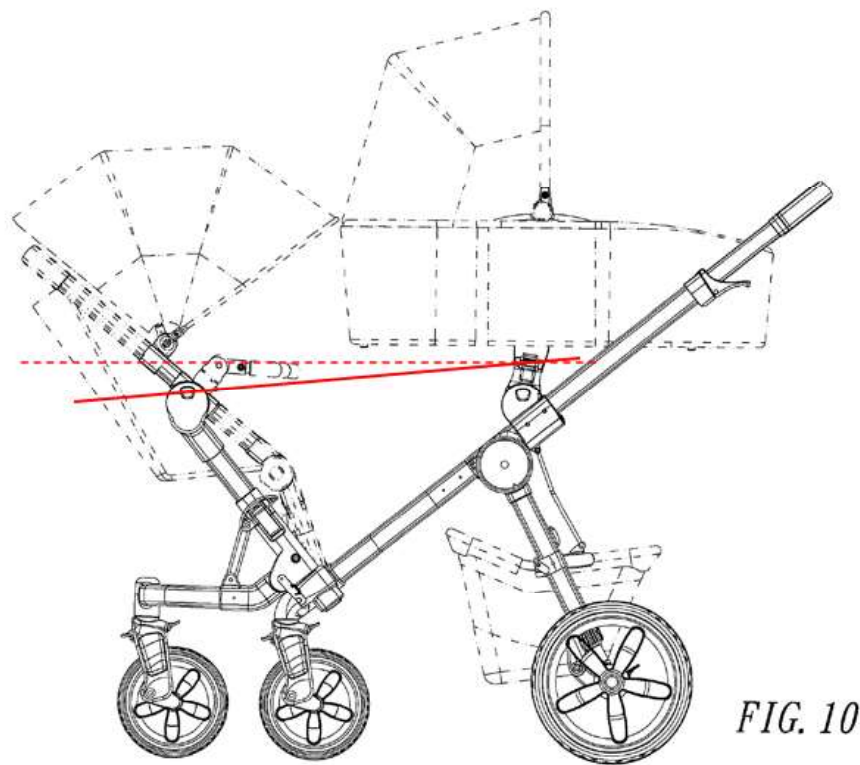
18. Second, Figure 10 discloses an “inline descending configuration” even under Patent Owner’s claim construction. (POR, 8-9.) In the bassinet embodiment of Figure 10, an intermediary connector is disposed between the lower connector and the seat connector, raising the bassinet’s connection point.



EX1048, Fig. 10 (Annotated and Magnified)

19. The intermediary connector has a lower detent that releasably couples to the lower connector and an upper detent that couples to the seat connector. That upper detent is “where the seat attaches to its seat attachment adapter.” (POR, 8.)

20. The line below extends through the upper detent connection of the bassinet seat and through the lower-seat location Patent Owner identified. Even if those are found to be the correct locations for assessing claim limitation [1.8], Liao discloses that “the first seat and the second seat, when connected to the frame, are arranged in an inline descending configuration along the stroller frame.”



EX1048, FIG. 10 (Annotated)

III. Ground 1 of the '771 Patent – claim 1 is obvious over Rolicki

21. In my first declaration for IPR2025-01140, I opined, as an alternative, that it would have been obvious to reverse the seats of Rolicki between forward-facing and rear-facing configurations. (EX1001, ¶312.)

22. Rolicki incorporates by reference PCT/US2011/062669 / WO 2012075157 (EX1050), in its entirety which discloses a similar seat connector and seats connectable in the rear facing configuration. (EX1001, ¶312.) Figure 9 of WO '157 shows a tandem stroller with seats 913a and 913b. The front seat 913a is in the rear-facing configuration and the rear seat 913b is in the forward-facing configuration. (EX1050, Fig. 9). Each of the seats 913a/913b is removably coupled

to the supports 910, 914 via hubs 922. (EX1050, Fig. 9, ¶¶0012, 0063, 0068-0069.)

23. The hubs and mating interfaces are identical for both seats. (EX1050, Fig. 9) That is, both seats 913a and 913b are mirrored left-to-right and are centrally aligned. WO '157 does not disclose any asymmetry or directional keying that would restrict installation to one orientation. Furthermore, nothing in WO '157 suggests any structural difference between the forward-facing and rear-facing interfaces.

24. Both Rolicki and WO '157 disclose “bayonet” seat attachments that are laterally symmetric and non-keyed. (EX1047, 13:19-20, Figs. 3-4, 10; EX1050, Fig. 9, ¶¶0063.) Therefore, a POSITA would understand that this symmetric connector system supports both forward-facing and rear-facing installations of the seats.

25. It is therefore my opinion that it would have been obvious to have “the first seat being connectable to the frame in either a forward or backward facing position to form the single seat configuration” in view of Rolicki.

IV. Ground 3 of '771 Patent and Ground 4 of the '682 Patent – It would have been obvious to combine Offord '341 and Offord '797

- 1. Reversing the interface components 100 would not make the stroller unstable.**

26. In my first declaration¹, I provided an annotated and modified figure of Offord '341's stroller with the interface components 100 reversed.

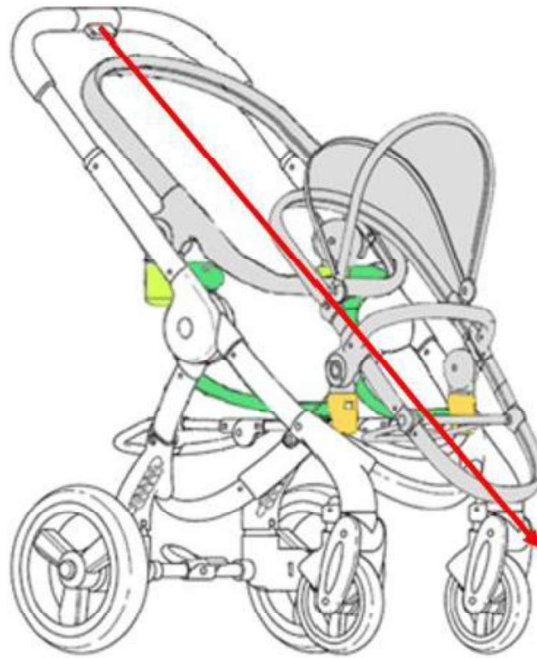


FIG. 15

EX1001, 283, Offord '341 Fig. 15 (Annotated and Modified)

27. The cups 34 (green/yellow) are where the seats connect to the interface component 100. As shown above, both cups 34 are still between the front and rear wheels. This is a stable condition not prone to tipping. The cups 34 are where the vertical forces are imparted into the interface component 100 and are also the

¹ For simplicity I will cite to my declaration filed in IPR2025-01140 for the '771 Patent. But similar disclosure can also be found in my declaration filed in IPR2025-01122 for the '682 Patent.

approximate location of where the child's center of mass is when seated in the seat. This places most of the seat load between the first and rear wheels. As shown in the drawing, only the child's legs are forward of the front wheels. The child's legs are not heavy and would not create instability.

28. Further, counteracting any forward weight from the front seat are the heavy rear wheels, which Dr. Cameron admits creates a rearward bias in the stroller center of gravity. (EX2011, 67-68, ¶131.)

29. Dr. Cameron and Patent Owner's attorney place great emphasis on Offord '341's (EX1051) passage at 9:45-52. (POR, 63-64; EX2011, ¶131.) This passage discusses the adjustment of the interface components, which is not something I relied upon in my first declaration.

Furthermore, it would be **possible to readily change the distance between the lower and higher connector sockets 106 of each component 100 with an adjusting device**. Such adjusting device could take the form of a telescopic upper mounting piece whereby the horizontal distance between the connector sockets 106 of each component 100 could be readily changed. Alternatively, by a similar arrangement, the vertical distance between the connector sockets 106 could be readily changed.

Such adjustment is advantageous in prolonging the useful life of the vehicle 2, as it will “grow” with the infants being transported by it, and whom will remain comfortably accommodated. However, the

adjustment must be kept within safe limits, such that the child-carrying units remain as close to the centre of gravity of the vehicle 2 as possible to prevent any possibility of dangerous tilting or toppling over of the vehicle 2.

(EX1051, 9:37-52.)

30. These paragraphs provide a roadmap for how to maintain stability by properly selecting limits on the amount of adjustment for the interface components 100. These paragraphs are silent on reversibility. If anything, these paragraphs support my opinion that it would have been obvious to reverse the interface components 100 because a POSITA reading these paragraphs is provided with instructions for achieving stability through proper adjustment of the interface components 100. Moreover, these paragraphs reinforce the capabilities of a POSITA, who is more than capable of fine-tuning routine design choices such as socket placement, seat placement, adjustability, and frame geometry when designing a stroller.

2. The connectors of Offord '341 are symmetrical allowing reversal

31. In my first declaration (EX1001) I explained “a POSITA would understand that the structure of the connector portions 48 and retractable detents 76 of the Offord '341 seat attachments are such that the seats 10 can be reversed so the connector portions insert into the connector sockets 106 of the interface portion

100.” (EX1001, ¶517.)

32. Dr. Cameron argues that Offord '341 has asymmetric connectors to prevent reversibility. (EX2011, ¶137.) Dr. Cameron's opinion is based solely on the drawings. The text of Offord does not say that the connectors are asymmetric. As I explain below, Dr. Cameron's opinions based solely on the drawings are incorrect.

33. Dr. Cameron alleges, with reference to her annotated Figure 4 that the “locking feature highlighted in red is not symmetrically positioned within the opening of receptor cup 34.” (EX2011, 69, ¶¶135-137) This is supposedly shown by the “locking feature” being to the left of the purple minor axis.

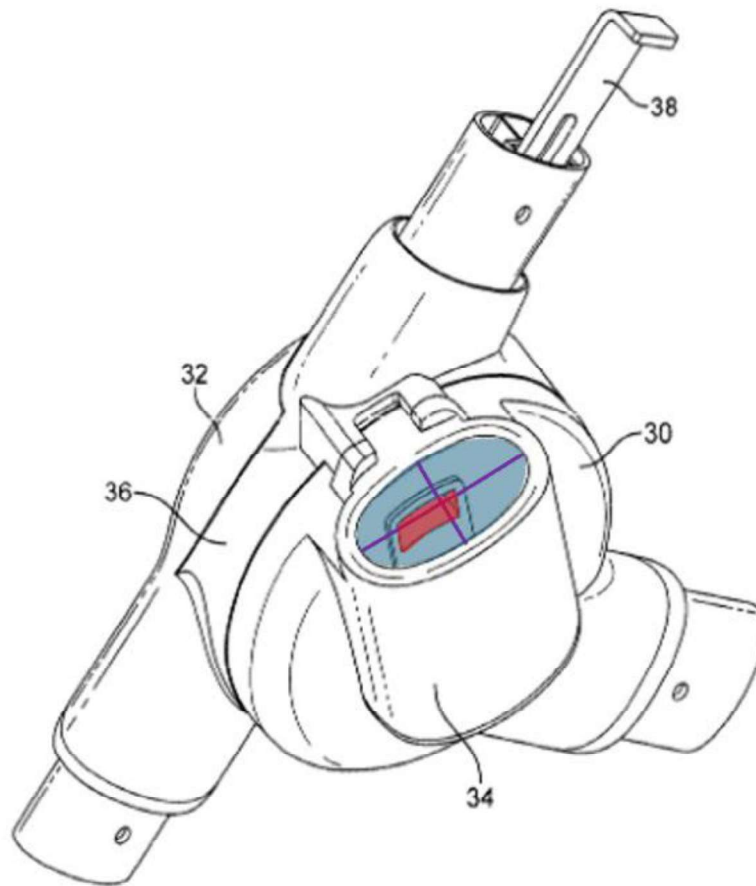


FIG. 4

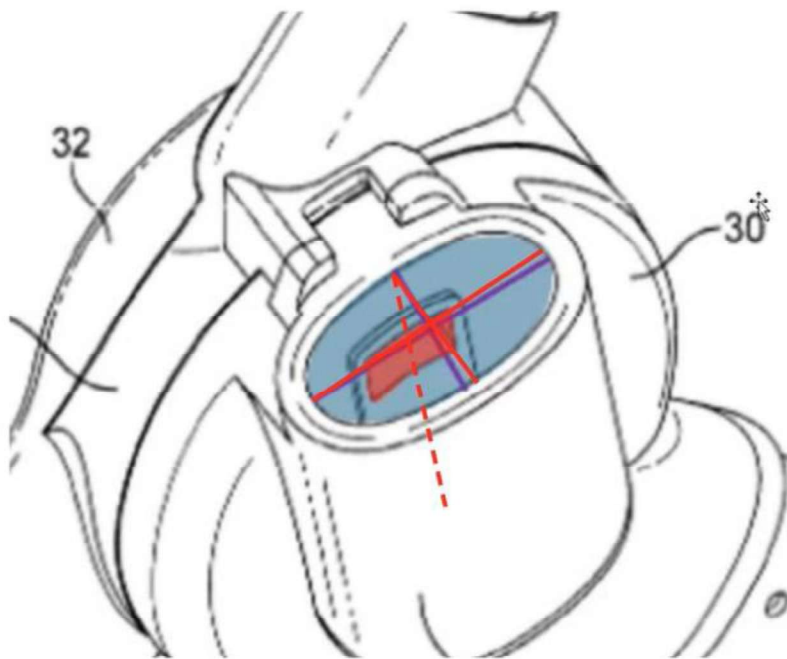
EX2011, 69, ¶135, Offord '341 Fig. 4 (Annotated)

34. I have reviewed Dr. Cameron's annotated figure and the purple minor axis of the elliptical cup 34 is drawn incorrectly. In Dr. Cameron's annotated Figure 4, the minor and major axes of the ellipse intersect at a skewed angle relative to the perspective of the drawing.

35. Conclusions drawn by Dr. Cameron from her annotations are also technically wrong. The annotations are shown at the rim of the cup 34 and not at the elevation of the "locking mechanism." (EX2011, 69, ¶135, Fig. 4.) Since Figure 4 is

an off-axis perspective view, the location of the locking mechanism must be assessed at its elevation, not at the rim of the cup 34.

36. Below I have correctly shown the major and minor axes (solid red) and a vertical construction line (dashed red) running along the inside wall of the cup 34. The vertical construction shows that the “locking mechanism” is centered in the cup 34.



EX1051, Offord '341 Fig. 4 (Annotated and Cropped)

37. Dr. Cameron further argues “[t]he same asymmetry appears on the mounting device 14 that couples with receptor cup 34.” (EX2011, ¶136.) This is based on her measurements taken from Figure 16. (EX2011, 70, ¶136.)

38. Figure 16 is not an engineering drawing used to design and build a

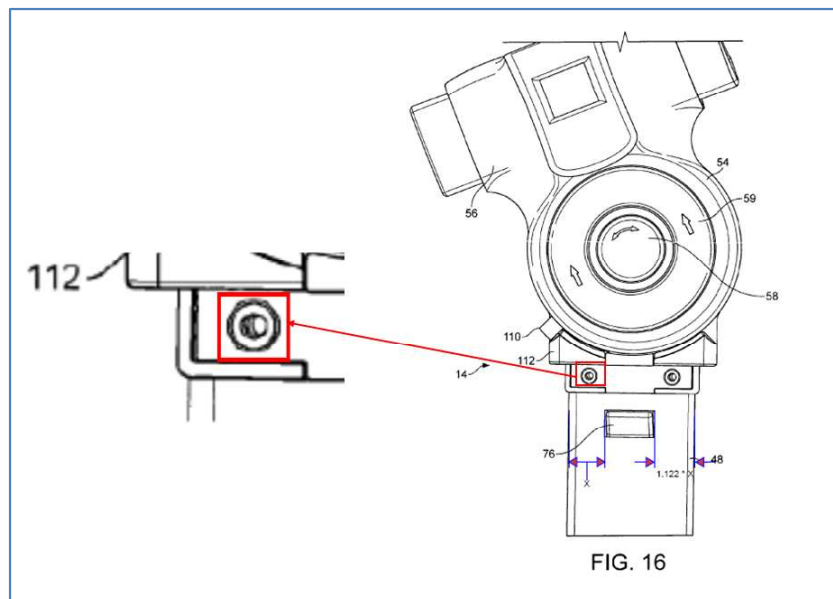
stroller; it is an imprecise patent drawing used to disclose a concept. A person having ordinary skill in the art would have understood that Figure 16 was not intended to show precise dimensions of the mounting device 14. Take, for example, the depiction of the second part 54 of the hub assembly 52. The left side (blue line) is shown narrower than the right side (purple line) in Figure 16. A person having ordinary skill in the art would have understood that the hub assembly 52 is a circle (see e.g., the section view of Figure 12) with the left and right sides having a common radial width. Another imprecision in Figure 16 is that the bottom of the leg 48 is not square due to the left side being drawn longer than the right side. This is not an intentional design feature, but rather the result of an imprecise drawing.



EX1051, Offord '341 Fig. 16 (Annotated)

39. While “FIG. 16 is a side view of a mounting device” (EX1051, 5:11-12), the figure shows some front-facing components slightly in perspective and is not a true elevation view. Most telling, Figure 16 depicts the threads of both of the screw holes. (See below figure). The threads would only be visible if the mounting device 14 was rotated relative to the vantage point of the figure. Similarly, an inner

wall (circled in red) of the leg is visible as is a back side of the cut seat frame tube (circled in green). (See above figure.) Each of these features would only be visible if the mounting device 14 was rotated relative to the vantage point of Figure 16. A POSITA would thus understand that Figure 16 is rotated slightly into the page to the left. The above noted features—especially the threads—would not be visible in a true elevation view. It is clear to me that the vantage point of Figure 16 has some level of a perspective angle.



EX1051, Fig. 16. (Annotated and Magnified)

40. A POSITA understands that precise dimensions, down to the millimeter, can only be made on engineering drawings. As such, a POSITA would not attempt to measure Figure 16 to determine the relative placements of components with precision because it is imprecise and was never intended to show accurate dimensions.

41. A POSITA further understands that dimensions cannot be measured on a view that is even slightly in perspective because the angles and distances are distorted in order to give the appearance of a three-dimensional object on a two-dimensional page. It is my opinion that Figure 16 is not a true side or elevation view and instead is slightly rotated to the left. This artificially depicts the detent 76 shifted to the left when viewed from the vantage point of Figure 16. It is my opinion that the detent 76 is centered on the leg 48. This is consistent with Offord '341's statement that the interface component 100 is "similar" to the subframe arrangement disclosed in Offord '797. (EX1051, 9:35-36.)

42. To the extent Figure 16 is a true side view and to scale, which I dispute, Dr. Cameron does not even provide actual dimensions in her annotated Figure 16, instead alleging that the right dimension line is 12.2% longer than the left dimension line. (EX2011, 70.) It appears that Dr. Cameron copied Figure 16 into a CAD program, zoomed-in, and measured the lines at a scale that differed from the published patent, which is not what a POSITA would view when reading Offord '341. Therefore, I believe that Dr. Cameron's annotated dimensions are of no value in expressing the understanding of a POSITA, who would not view the figure at a zoomed-in scale in a CAD program.

43. I measured Figure 16 at the scale as published and found the left and right dimensions as 11.2 mm and 12.0 mm, respectfully. This is only a 0.8 mm

difference. Given that Figure 16 is for describing an invention, as opposed to an engineering drawing for building a product, the tiny 0.8 mm offset would not convey to a POSITA that the detents 76 are designed to be asymmetrical.

44. Moreover, a POSITA would have understood the minor differences measured by Dr. Cameron were within manufacturing tolerances and not indicative of intentional asymmetric design.

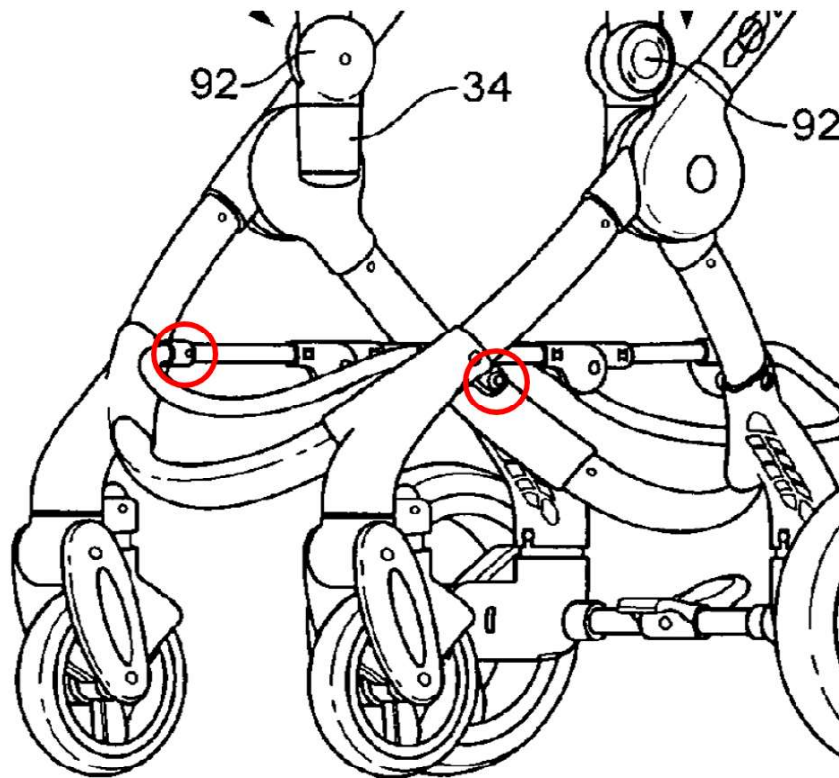
45. I also disagree with Dr. Cameron that a POSITA would be discouraged from pursuing reversibility of the interface components 100 due to a slight misalignment of the detents 76 and the “locking feature.” (EX2011, ¶140.) It was well within the basic capabilities of a POSITA to make minor adjustments to the placement of the detents and “locking features” so that they align in both orientations of the interface components 100. In my experience designing strollers, which Dr. Cameron appears to lack (EX2012), I routinely modified the locations of components to provide proper fit and alignment with other components. When two connecting components are misaligned by mere millimeters, it is obvious to a POSITA that the solution is to slightly shift the placement to put the connecting components into alignment. This is routine design work.

3. Lugs 108

46. I disagree that the “lug 108 would physically interfere with the frame connection.” (POR, 64.) I first note that Dr. Cameron did not opine that the lug 108

would physically interfere with the basket frame 44. (EX2011, ¶139.) Instead, Dr. Cameron stated, “it is not clear that there is even room for the forward connector socket 106 if an attempt was made to reverse the components 100.” (EX2011, ¶139.) Dr. Cameron did not provide analysis supporting her speculative pronouncement other than to say “the basket frame 44 extends further to the rear than to the front ... [t]his is a problem because the lug 108 would be perpendicular to the side to side direction of the frame and could not sit on the portion of the frame that spans the stroller left to right.” (EX2011, ¶139.)

47. Dr. Cameron’s analysis failed to consider several key facts. First, the lug 108 rests on the inside of the basket frame 44, not on the outside where the basket frame 44 connects to the stroller frame via a fastener as circled in red. (See e.g., EX1051, Figs. 13B.) Therefore, the frame connection point does not interfere with the lug 108 resting on the basket frame 44 when the interface component 100 is reversed. Moreover, Figure 13B, for example, shows the fastener connection as flush to the inside of the basket frame 44.



EX1051, FIG. 13B (Magnified and Annotated)

48. To the extent the lug 108 rested at that connection location when the interface component 100 was reversed, which I do not agree with, the lug 108 would simply rest on the head of the fastener, which is flush.

49. Second, it is my opinion that the lug 108 sits forward of the connection between the lug 108 and the basket frame 44 in the reverse direction of the interface components. As shown in the below annotated Figure 15, the basket-frame connection point is well behind the lower socket (green) to which the lug 108 is attached.

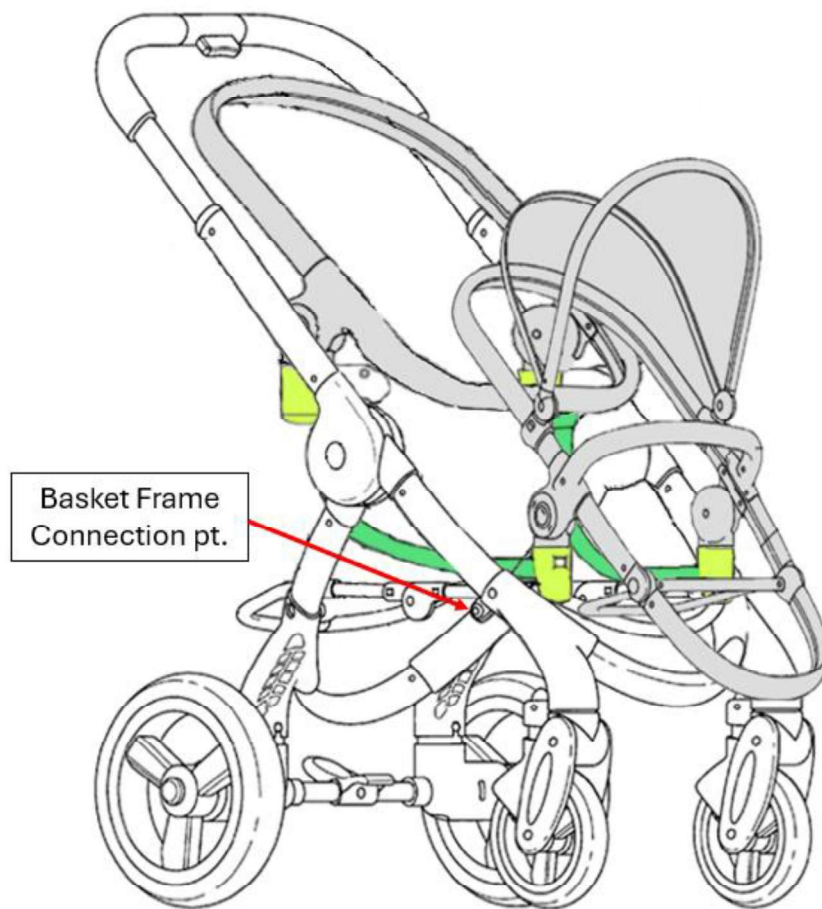


FIG. 15

EX1051, Fig. 15 (Annotated)

50. Third, the interface components 100 are adjustable:

Furthermore, it would be possible to **readily change the distance between the lower and higher connector sockets 106 of each component 100 with an adjusting device**. Such adjusting device could take the form of a telescopic upper mounting piece whereby the horizontal distance between the connector sockets 106 of each component 100 could be readily changed. Alternatively, by a similar arrangement, the vertical distance between the connector sockets 106 could be readily changed.

(EX1051, 9:37-44.)

51. The adjustability of the interface components 100 would allow the lug 108 to be placed fore or aft of the connection between the basket frame 44 and the stroller frame, to the extent there is any interference. Therefore, a POSITA would have understood that the lugs 108 would not have prevented reversibility of the interface components 100.

V. Conclusion

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

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

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

Executed on:

7-2-26



Douglas S. Prairie