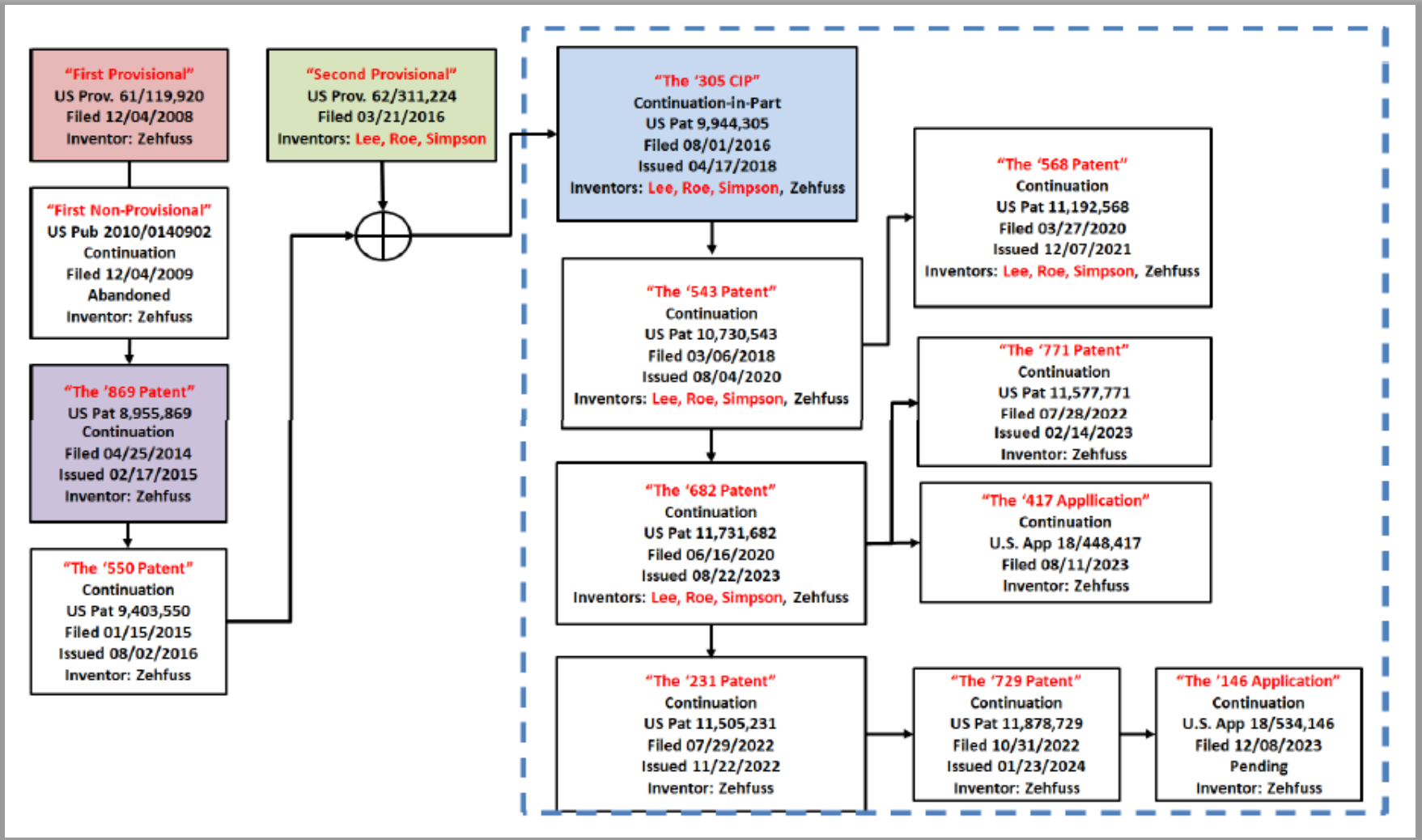


EVENFLO COMPANY, INC., V. BABY JOGGER II, LLC

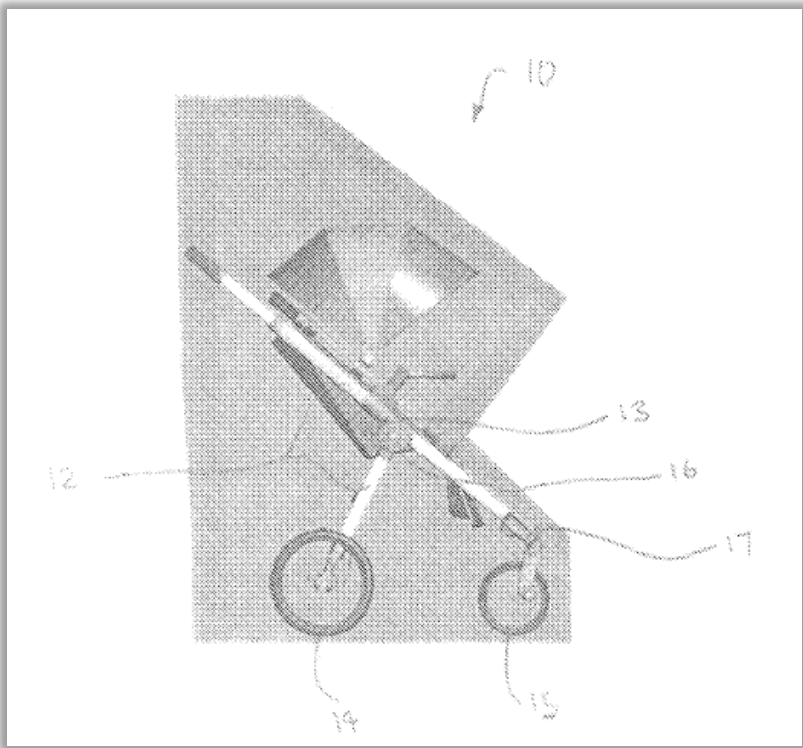
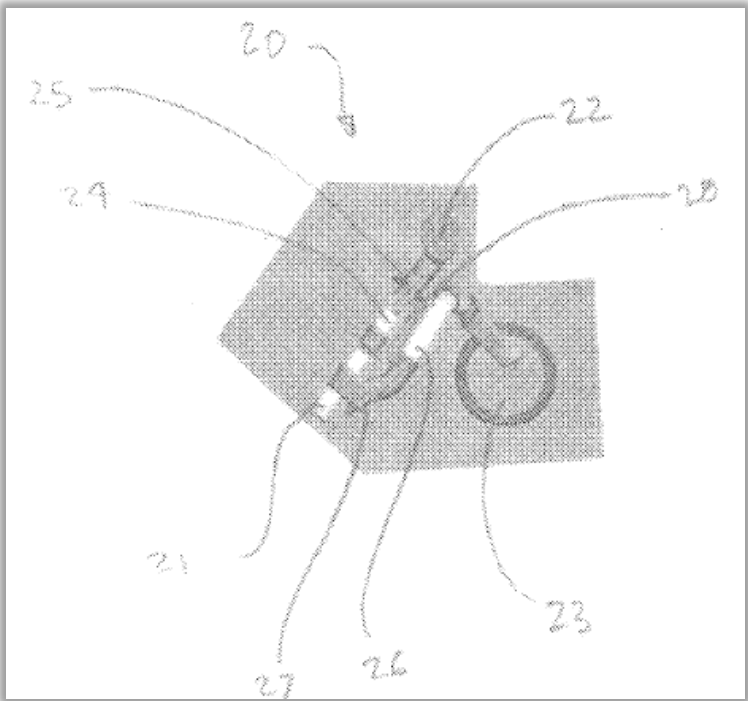
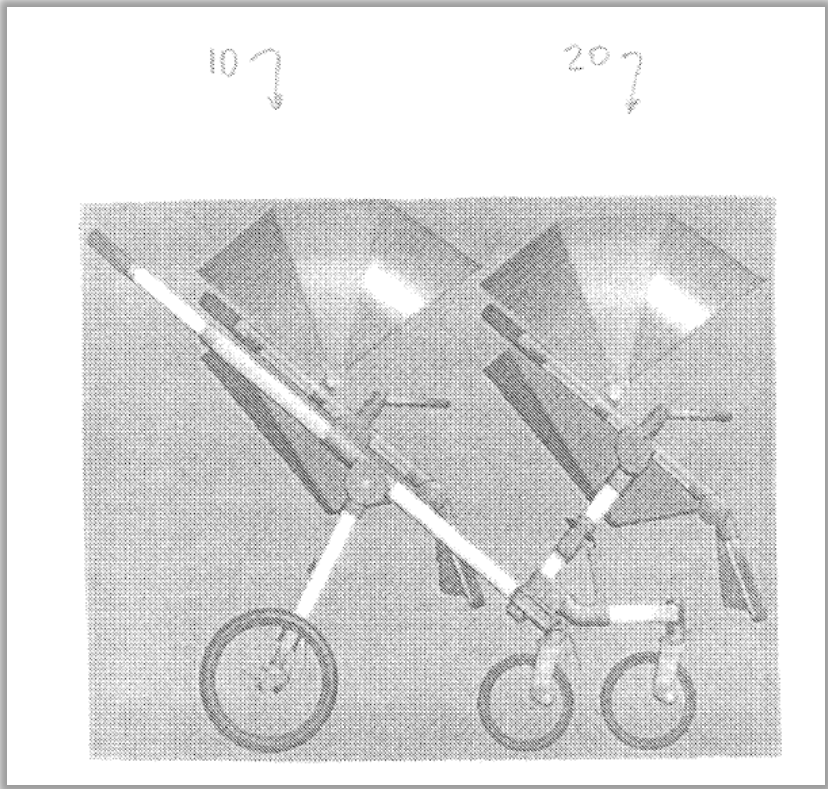
IPR2025-1122 (U.S.P.N. 11,731,682)
IPR2025-01140 (U.S.P.N. 11,571,771)

Oral Argument: August 27, 2026

Baby Jogger Patent Family

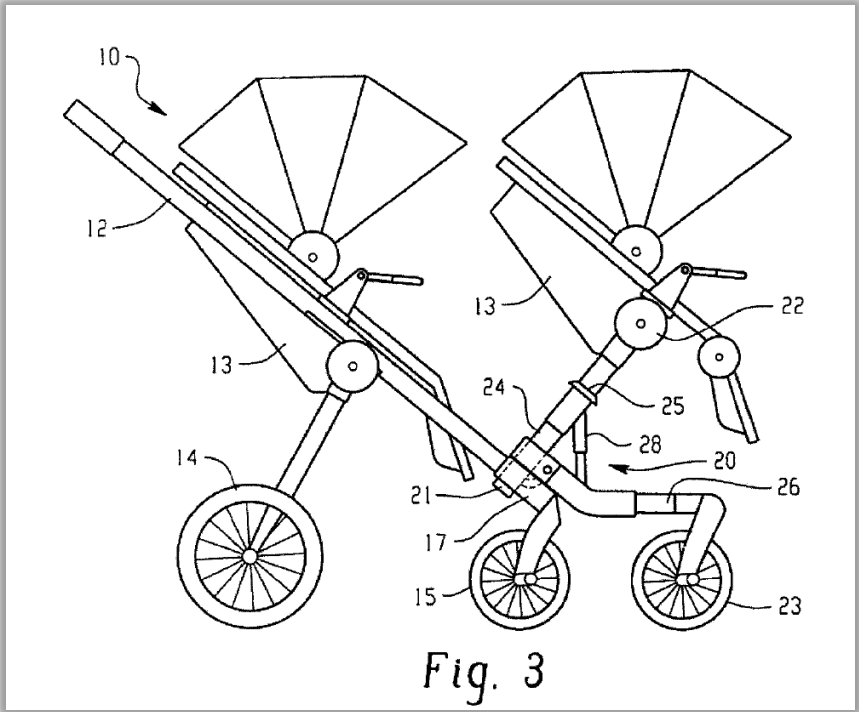


First Provisional Application (2008)

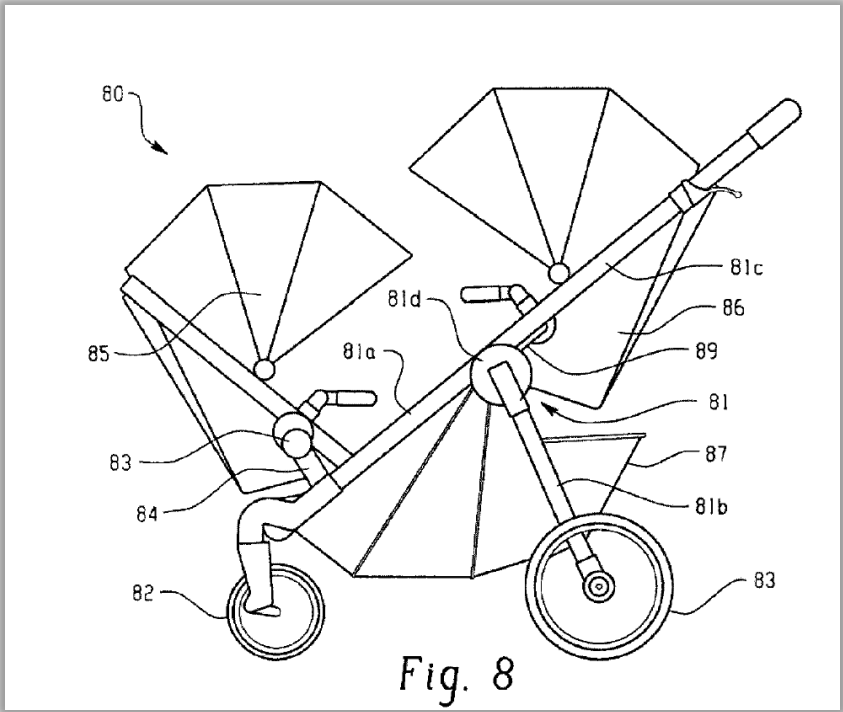


EX1002, Figs. 1-3

First Non-Provisional Application (2009)



Embodiment A
EX1003, Cover and Fig. 3

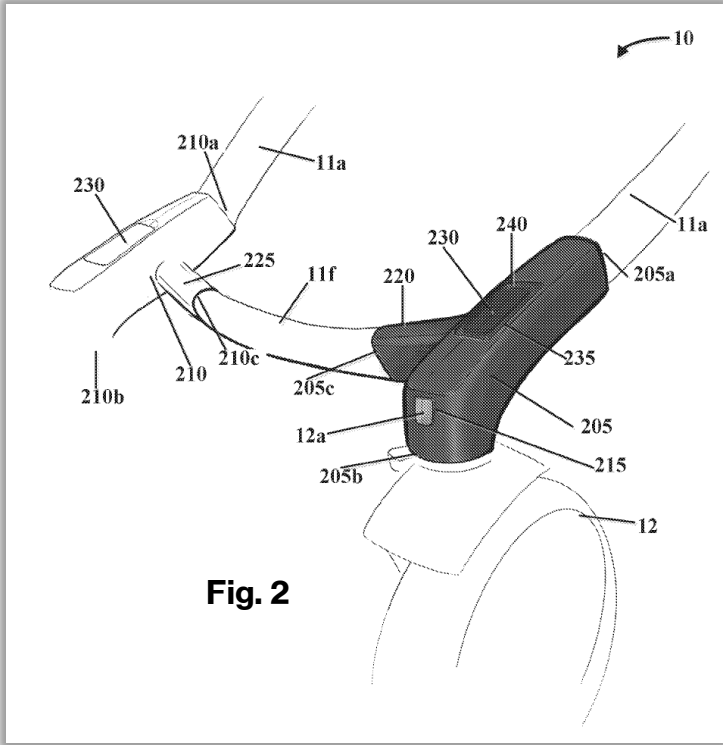
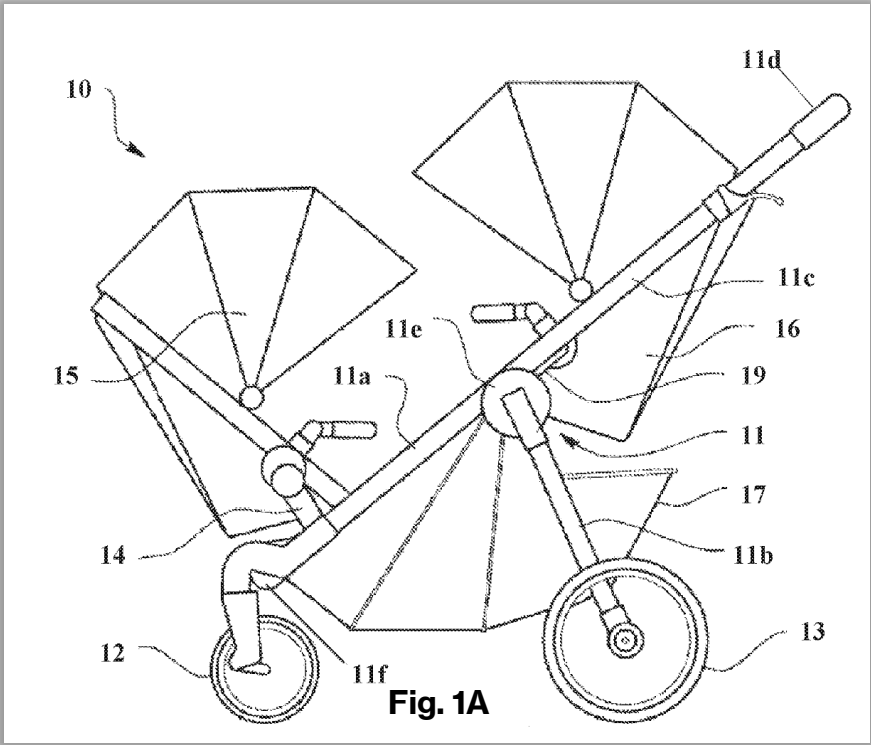


Embodiment B
EX1003, Fig. 8

(54) **SEAT ATTACHMENT FOR A STROLLER**
(75) Inventor: **Mark Zehfuss**, Glen Allen, VA (US)

EX1003, Cover (75)

Second Provisional Application (2016)



Inventor(s)
Jon Hee Lee, Kalamazoo, MI;
Megan Roe, Kalamazoo, MI;
Noel Simpson, Portage, MI;

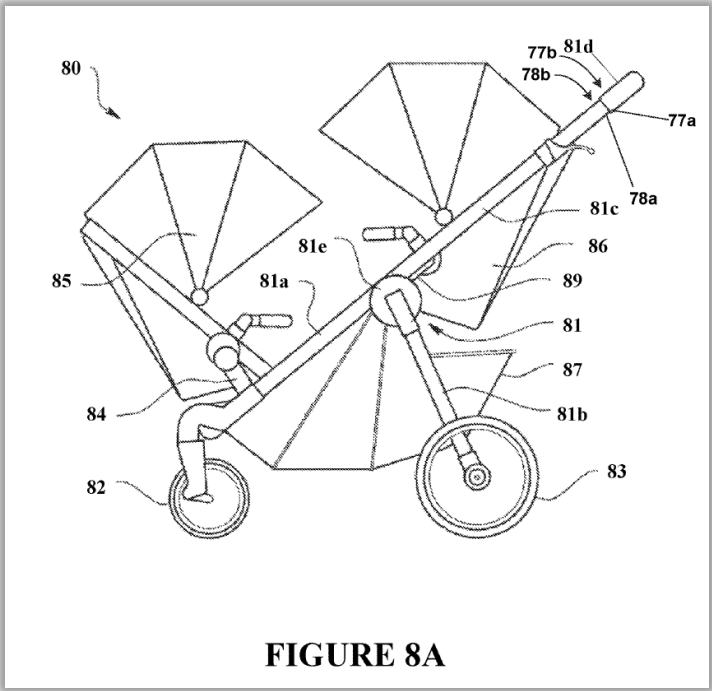
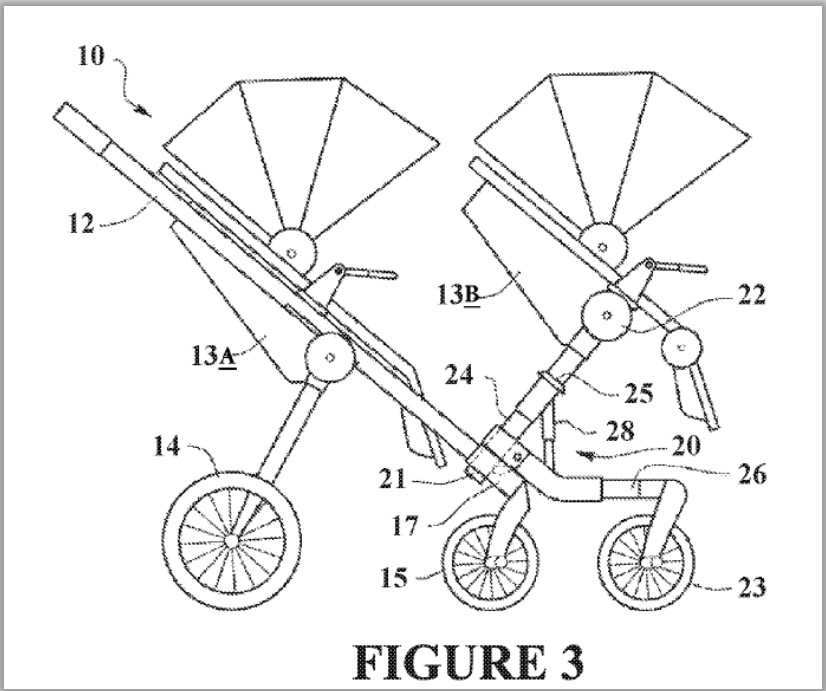
Applicant(s)
Baby Jogger, LLC, Richmond, VA;

EX1006, 1 (filing receipt)

Embodiment C
EX1006, 24 and 29, Figs. 1A and 2

'682 Patent

“Parent '305 CIP was rewritten to incorporate the 2016 Provisional and bears little resemblance to the 2009 Non-Provisional”



(72) Inventors: **Jon Hee Lee**, Highwood, IL (US);
Megan Roe, Kalamazoo, MI (US);
Stacy Noel Simpson, Portage, MI (US);
Mark Zehfuss, Glen Allen, VA (US)

EX1010, Cover (72)

EX1010, Figs. 3 and 8A

CLAIM CONSTRUCTION

IPR2025-1122 (U.S.P.N. 11,731,682)

IPR2025-01140 (U.S.P.N. 11,571,771)

Claim Construction both '682 and '771 Patents

- **“Handle Portion”**

- Parties agree: “portion of frame coupled to the left and right upper tube support frame.”

- **“Inline descending configuration”**

- Petitioner: Plain and Ordinary Meaning
- PO: “‘inline descending configuration’ must be measured only at the ‘structural mounting points’ where the seats connect to the adapters.”

“Inline descending configuration”

PO’s “structural mounting points”
“improperly conflicts with the plain
language of the claim.” (01140 Reply, 13.)

- “limitation states ‘when connected,’ not ‘where’ connected.”

(01122 Reply, 2 and 01140 Reply, 13, both quoting EX2100, 152:14-153:5.)

“the specification never uses ‘inline descending configuration’ and never says how it is measured.”

(01122 Reply, 3; see 01140 Reply, 14.)

’682 Patent- “wherein the first seat and the second seat, when connected to the frame, are arranged in an inline descending configuration along the stroller frame.” [1.8]

’771 Patent – “wherein the first seat and the second seat, when connected to the frame, are arranged in an inline descending configuration substantially along the plane of the frame.” [1.5e]

“PO’s cross-forum gamesmanship defeats its construction”



'231 Patent (EX1074, ¶109.)



'771 Patent (EX1074, ¶146.)



'682 Patent (EX1074, ¶181.)

Claim Construction '771 Patent

seat “connectable to the frame in either a forward or backward facing position” [1.4]/[1.5d]

- **Petitioner**: Plain and Ordinary Meaning is disjunctive, designating alternatives (Reply, 11.)
- **Patent Owner**: “first and second seats can each be adjustable from a forward-facing configuration to a rearward-facing configuration and vice-versa.” (POR, 14.)

[1.4] / [1.5d] seat “connectable to the frame in either a forward or backward facing position”

- “‘or’ has a plain and ordinary meaning: a disjunctive article designating alternatives.”

(01140 Reply, 11, citing *Schumer v. Lab. Comput. Sys., Inc.*, 308 F.3d 1304, 1311-1312 (Fed. Cir. 2002).)

- “Several Federal Circuit cases [find] ... ‘either ... or’ means either/or but not both.”

(01140 Reply, 11, quoting *MaxLite, Inc. v. Jiaying Super Lighting Elec. Appliance Co., Ltd.*, 2020 WL 2544925 at *6 (Patent Tr. & App. Bd., May 19, 2020).)

- “claim contains no requirement like ‘adjustable,’ ‘reconfigurable,’ or ‘capable of being changed between’ forward- and rearward-facing positions.”

(01140 Reply, 11.)

“PO improperly limits the claim to one of many embodiments.”

“Further, the seat support element 22 of the seat attachment 20 may be capable of supporting the front stroller seat 13 in either a forward-facing or backward-facing position.”

EX1011, 6:66-7:2

“The first stroller seat 86 may be fixedly coupled or removably coupled to the frame 81. In certain example embodiments wherein the first stroller seat 86 is removably coupled to frame 81, the first stroller seat 86 may be adjustable from a forward-facing configuration to a rearward-facing configuration and vice-versa, as shown, for example, in FIGS. 8B-8C. In addition, the second stroller seat 85, when coupled to the corresponding removable seat attachment adapters 84, can be adjustable from a forward-facing configuration to a rearward-facing configuration and vice-versa.”

EX1011, 11:9-19

“right and left seat attachments *disposed along* the right and left support members of the frame, respectively, at a second vertical position”

Petitioner: Plain and Ordinary Meaning: “to be placed through, on, over, or continuously beside or on a line or course parallel and close to’ a reference structure”

(Reply, 17, citing *Advanced Med. Optics, Inc. v. Alcon Inc.*, 361 F. Supp 2d 370, 389-90 (D. Del. 2005).)

PO: “the seat attachments must be positioned at a location on the length of the frame’s support members[.]”

(POR, 18.)

[1.5b] “right and left seat attachments *disposed along* the right and left support members of the frame”

“PO improperly attempts to add requirements that the seat attachments are connected to, or, at a minimum, ‘disposed on’ the frame.” (01140 Reply, 16-17.)

“Courts, however, have treated ‘disposed along’ as a spatial and positional term with an ordinary meaning broader than ‘disposed on.’” (01140 Reply, 17.)

- *Advanced Med. Optics, Inc. v. Alcon Inc.*, 361 F. Supp. 2d 370, 389-390 (D. Del. 2005) (“disposed along” means “to be placed through, on, over, or continuously beside or on a line or course parallel and close to” a reference structure – rejecting narrowing to simply mean “on.”)
- *Packers Plus Energy Servs. Inc. v. Baker Hughes Oilfield Operations, LLC*, IPR2018-01030, Paper 41, 23-24 (P.T.A.B. Nov. 5, 2019) (“‘disposed at’ more broadly encompasses features ... that are connected or nearby.”)

“PO’s proposed construction is inconsistent with its District Court position”

[1.5b] “right and left seat attachments **disposed along** the right and left support members of the frame”



PRIORITY

IPR2025-1122 (U.S.P.N. 11,731,682)

IPR2025-01140 (U.S.P.N. 11,571,771)

Overview of Priority Challenge

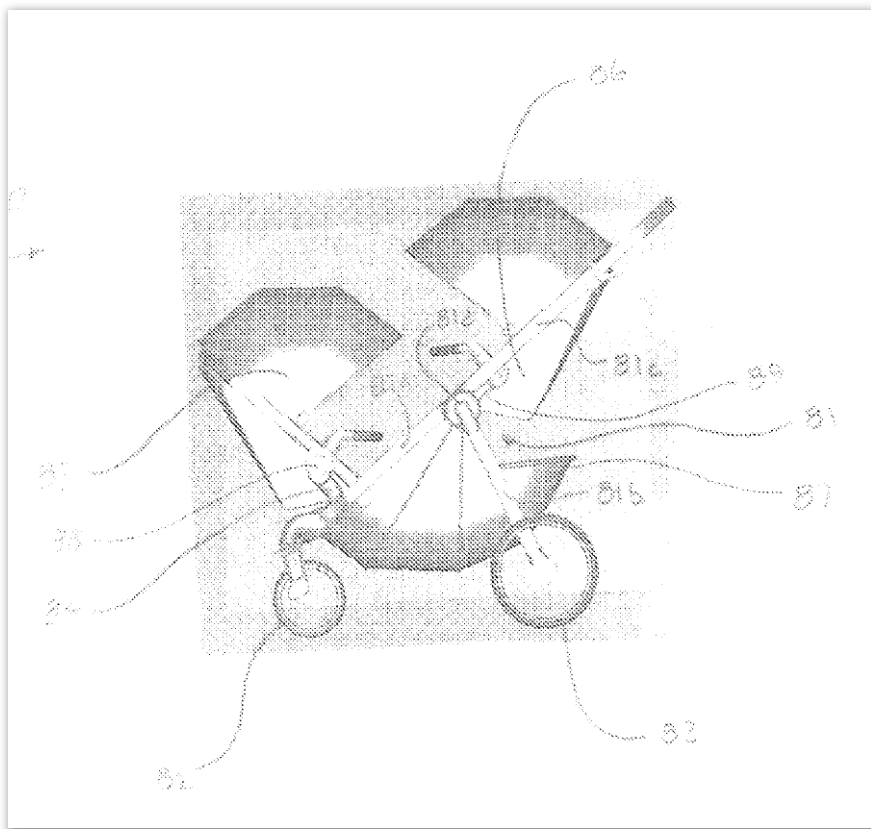
'682 Patent

- Handle Portion
- Seat Attachment Adapter
- Seat Attachment Housing
- First/second/third Vertical Position

'771 Patent

- Handle Portion
- Substantially within a plane

“Handle Portion” in 2008 Provisional



EX1002, Fig. 8

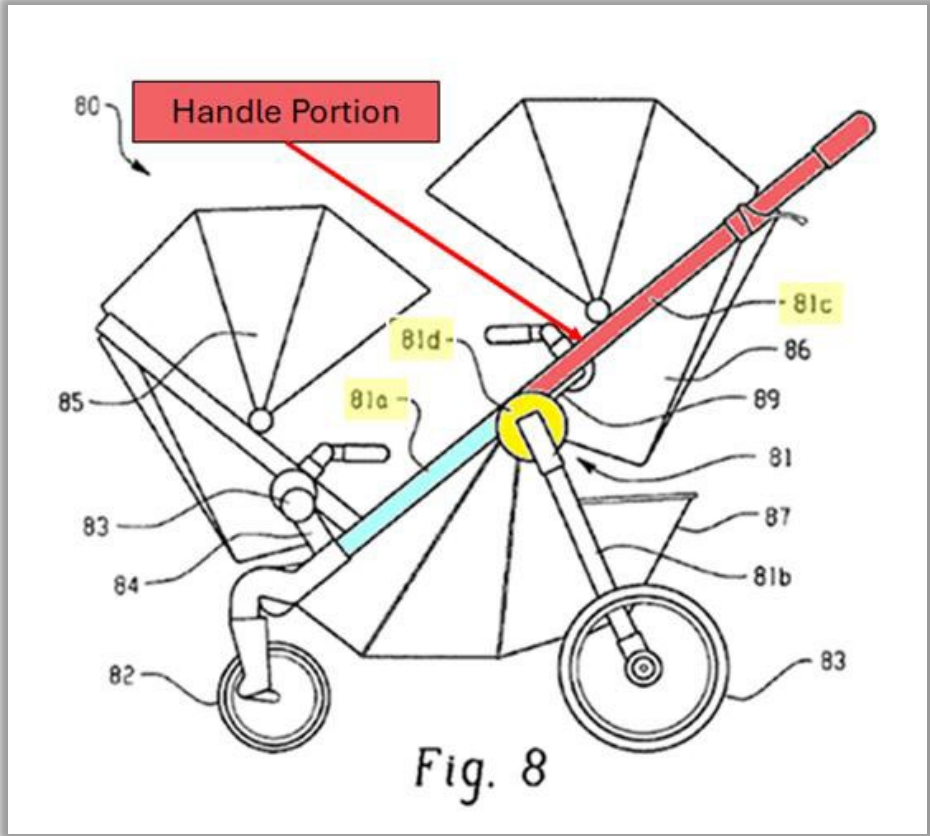
[0033] A further embodiment of the stroller 80 is shown in Figure 8. Stroller 80 may be easily converted from a single stroller comprising one seat to a double stroller comprising two seats without addition of another wheel on the attachment. Stroller 80 comprises a frame 81 capable of supporting the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

EX1003, ¶0033

[0035] Stroller 80 comprises a stroller seat 86. The stroller seat 86 is located adjacent to handle portion 81c. The stroller seat 86 may be fixedly attached or removably attached to frame 81. In embodiments of the stroller 80 wherein stroller seat 86 is removably attached to frame 81, the stroller seat 86 may be removed and replaced in a backward facing configuration, see Figure 9A, be replaced by a infant carrier or car seat, see Figure 9C, or replaced with a pram, see Figure 9D.

Agreed Claim Construction: “portion of frame coupled to the left and right upper tube support frame.”

“Handle Portion” in 2009 non-provisional application



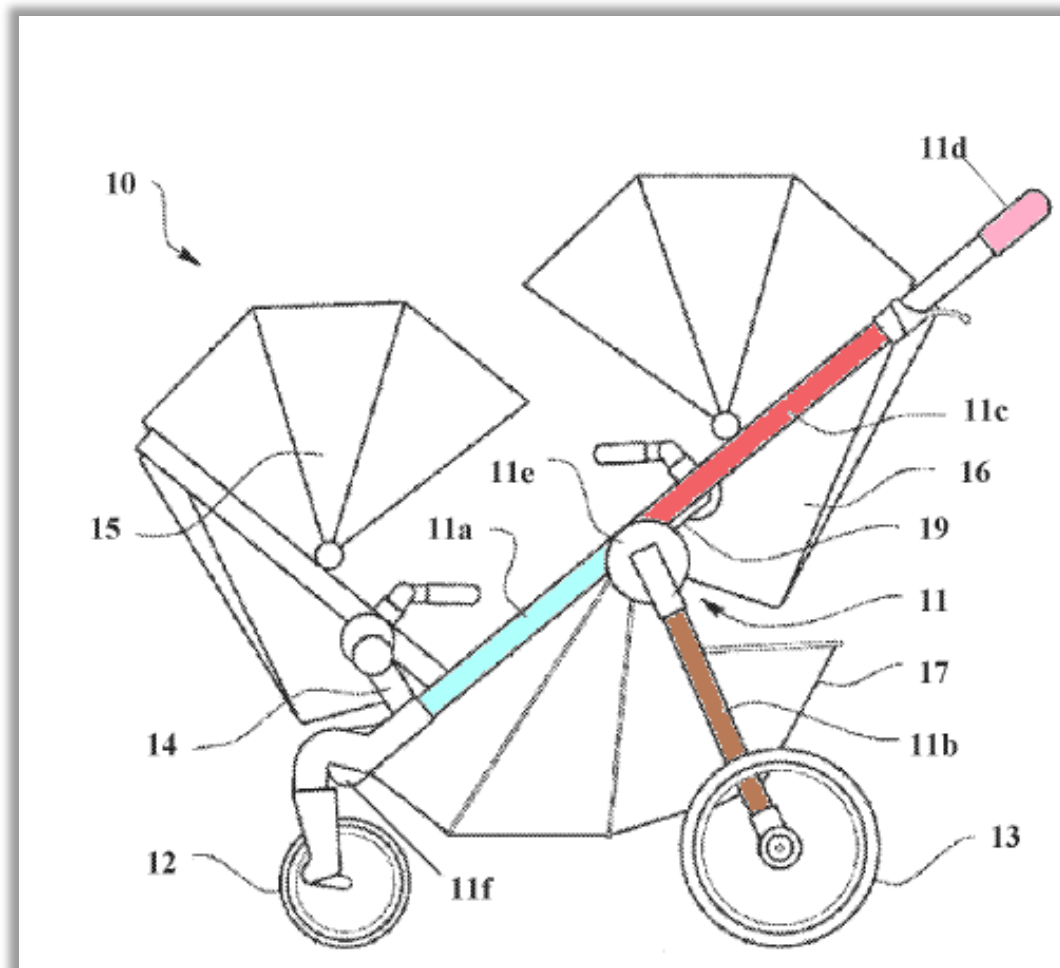
EX1003, Fig. 8 (Annotated)

ment. Stroller 80 comprises a frame 81 capable of supporting the stroller seat 86. In this embodiment, the frame 81 comprises a front wheel support portion 81a, a back wheel support portion 81b, and a handle portion 81c. The frame 81 of the embodiment of the stroller 80 further comprises a folding mechanism 81d that connects front wheel support portion 81a, a back wheel support portion 81b, and a handle portion

EX1003, ¶0043

Agreed Claim Construction: “portion of frame coupled to the left and right upper tube support frame.”

“Handle Portion” in 2016 Provisional



EX1006, 24, Fig. 1A (Annotated)

- 2016 provisional redefined the frame to include:
 - “front wheel support frames 11a”
 - “back wheel support frames 11b”
 - “upper tube support frames 11c” and
 - “a handle portion 11d”

- The redefined “handle portion 11d” was stated as being coupled to the ends of the “upper tube support frames 11c.”

EX1006, 8

“Handle Portion” in 2016 Provisional

The 2016 Provisional separated the “handle portion” from the “upper tube support frames” to support two new concepts. First, the two could be “made from a single unitary piece of material ... [or] ... separate pieces of the same or different material that are coupled to one another.” (EX1006, 8.) That concept is absent from the 2008 Provisional. Second, the 2016 Provisional disclosed the upper “first stroller seat 16 can be located generally *closer to the handle portion 11d* than to the front wheels 12.” (EX1006, 11.)

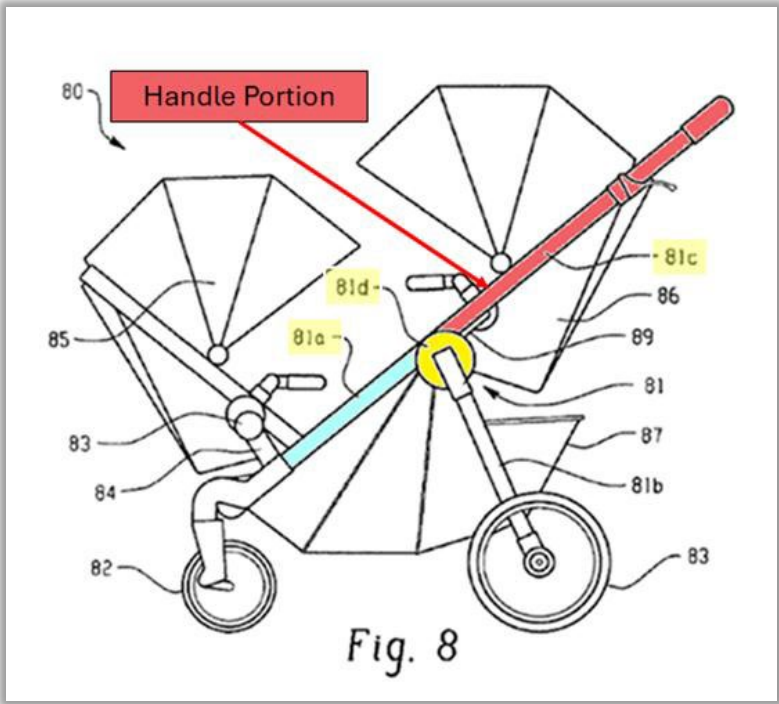
01140 Reply, 22; see 01122 Reply, 9

“PO amended the figures and specification . . . to further clarify the structure and start/end locations of the recited ‘handle portion’” during prosecution of the ‘543 parent patent. (01140 Pet., 18, citing EX1008, 9:1-7; EX1018, 636, 639.)

01122 IPR: Pet., 15-17, 23; EX1001, ¶¶171-172; Reply, 11-12
01140 IPR: Pet., 18-19; EX1001, ¶¶146-150, 174-177; Reply, 23-24

Handle Portion, as claimed, was not disclosed before 2016.

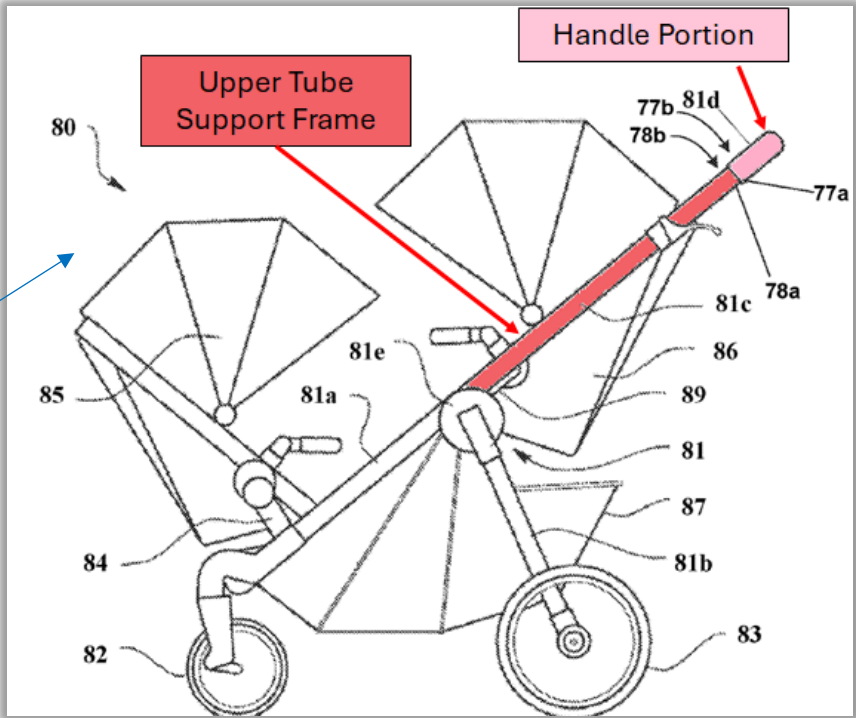
Original Definition



EX1003, Fig. 8 (annotated)

Agreed Construction :
*“Handle portion” is the
 “portion of frame coupled
 to the left and right upper
 tube support frame.”*

New Definition



EX1008, Fig. 8A (annotated)

Dr. Cameron applies the wrong claim construction

Dr. Cameron	Agreed Construction
“plain meaning of ‘handle portion,’ ... is the structure at the upper rear of the stroller frame that allows the caregiver to grip and push the stroller.” EX2011, ¶50	“portion of frame coupled to the left and right upper tube support frame.”

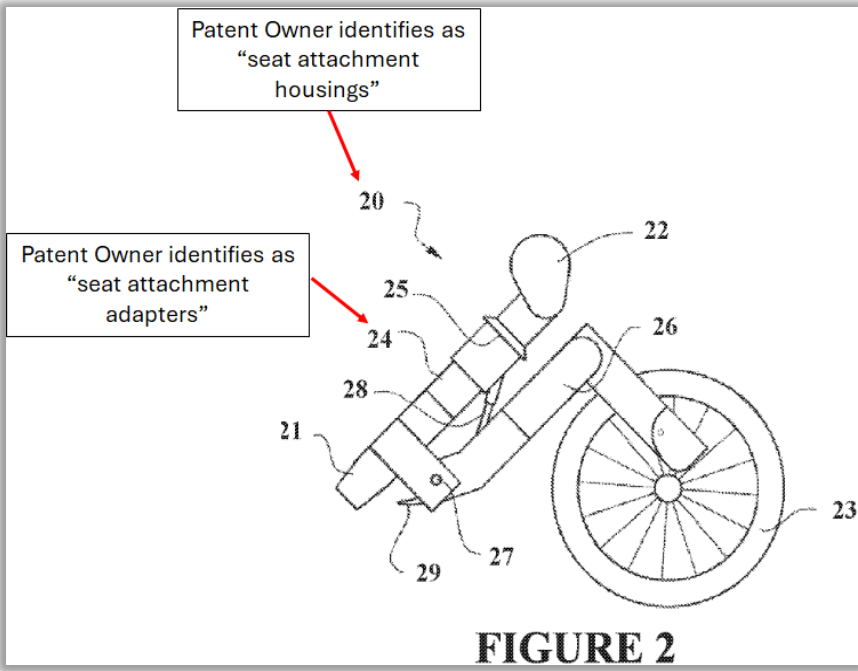
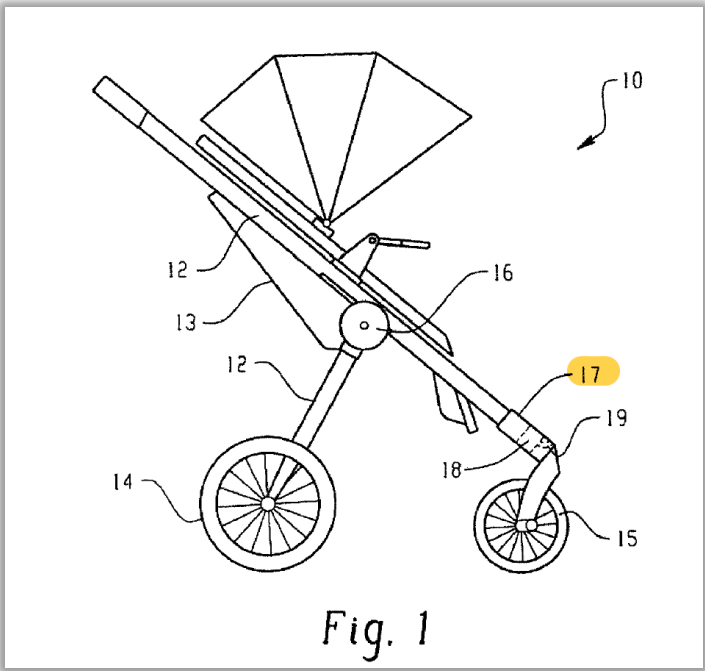
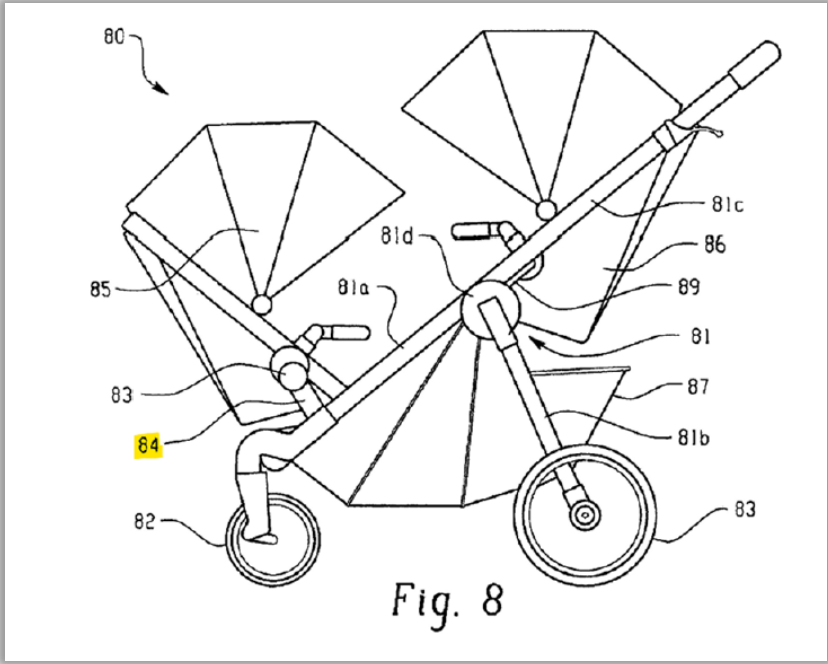
‘682 Patent – Claim 1

A stroller, comprising:

- a stroller frame comprising a handle portion and a front end portion;
 - a plurality of wheels comprising a plurality of back wheels;
 - a first seat coupled to the stroller frame at a first vertical position of the stroller frame, wherein the first seat is disposed closer to the handle portion than the front end portion of the stroller frame;
 - a **first seat attachment housing** coupled to the stroller frame at a second vertical position of the stroller frame that is below the first vertical position, wherein a first front wheel and a second front wheel extend from the front end of the stroller;
 - a **second seat attachment housing** coupled to the stroller frame at a third vertical position of the stroller frame that is below the first vertical position, wherein the third vertical position is closer to the front end portion than the handle portion;
 - a **first seat attachment adapter** spaced from and coupled to the first seat attachment housing by a first attachment frame member; and
 - a **second seat attachment adapter** spaced from and coupled to the second seat attachment housing by a second attachment frame member;
- wherein the first seat and the second seat, when connected to the frame, are arranged in an inline descending configuration along the stroller frame.

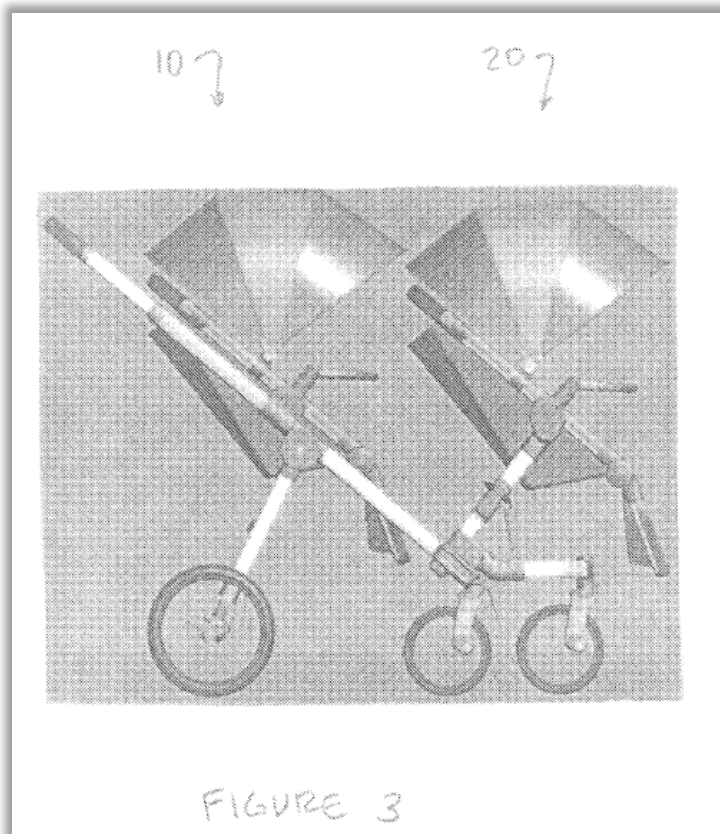
“PO referenced certain components shown by the existing figures. . . as meeting the claim elements”

Claim Term	File History	POR
Adapter	Seat attachment element 24	Seat attachment portion 84
Housing	Seat attachment 20	Connector portions 17



"2008 Provisional does not disclose 'Adapters' or 'Housings'"

A "housing" is an enclosing structural component that "houses something."



- "connector portions 17' are not 'seat attachment housings.'"
- merely "front-mounted features with a 'cylindrical recess' into which '[t]he attachment portion 21 may be inserted.'" (EX1002, 37, 39)."

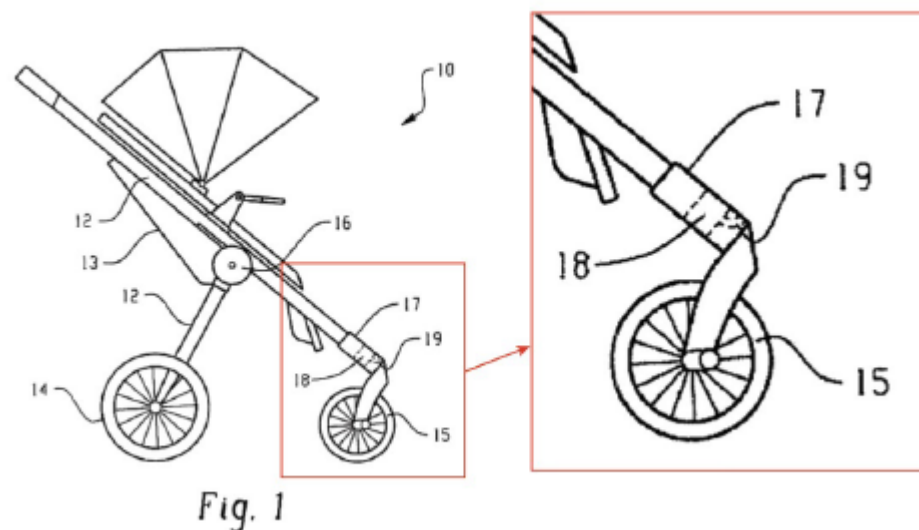
01122 Reply, 15

- "Seat attachment portions 84" are not "seat attachment adapters."

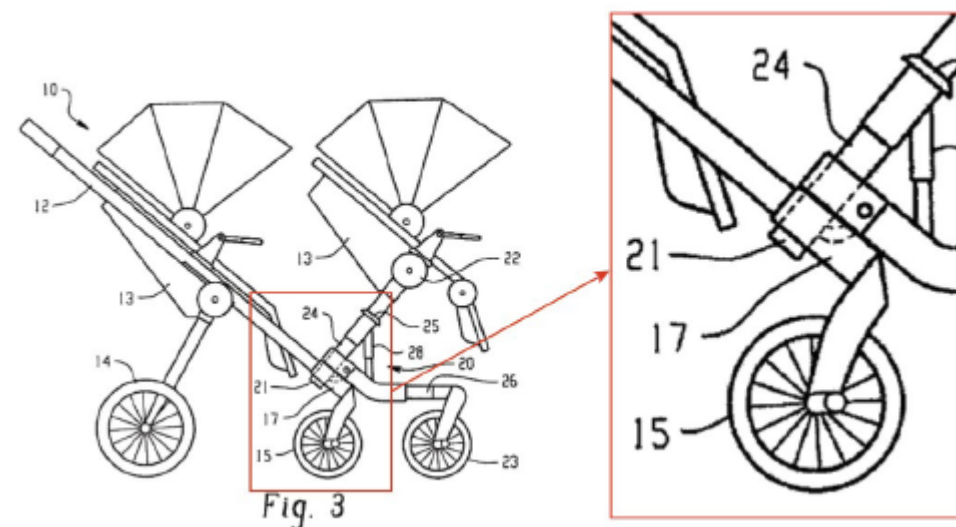
01122 Reply, 17

“2008 Provisional does not disclose ‘Adapters’ or ‘Housings’”

A “housing” is an enclosing structural component that houses something.



01122 Sur-Reply, 13



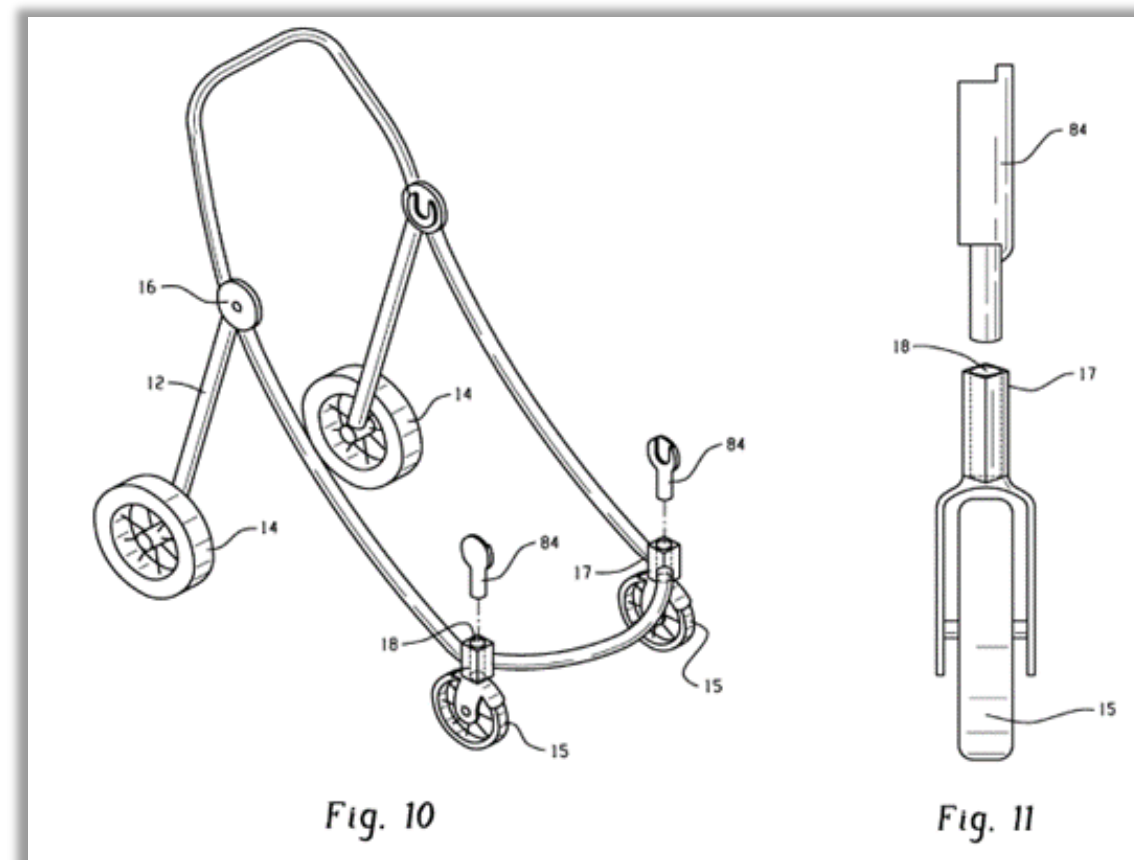
01122 Sur-Reply, 13

“attachment frame member [17] of the stroller has a complimentary and cooperating shape that allows the connector portion [21] to be secured to the attachment portion of the stroller”

01122 Sur-Reply, 12-13, citing Ex. 1003 ¶ 35

"Figs. 10 and 11 [of 2009 Non-Provisional] do not cure the deficiency"

- "2008 Provisional did not include these figures" (Added June 12, 2013)
- "Written description for these figures was added to the '305 CIP"
 - seat support element 84
 - attachment portion 17



EX1014, 233-234

Claim 1 of '682 Patent

a first seat coupled to the stroller frame at a **first vertical position** of the stroller frame...;

a first seat attachment housing coupled to the stroller frame at a **second vertical position** of the stroller frame that is below the first vertical position. . . ;

a second seat attachment housing coupled to the stroller frame at a **third vertical position** of the stroller frame that is below the first vertical position . . . ;

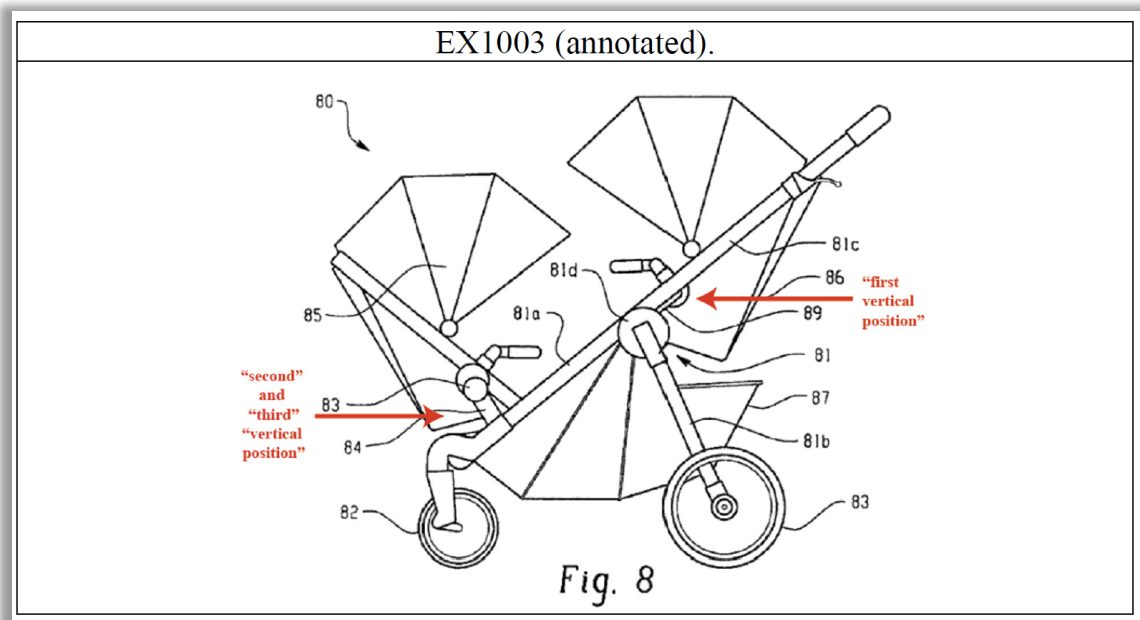
01122 IPR: EX1010, Claim 1

The 2008 Provisional Does Not Disclose “vertical position[s]”

Claim 1 fixes the second and third “vertical position[s]” by reference to the housings, reciting one “coupled to the stroller frame at a second vertical position” and another “at a third vertical position ... below the first vertical position.” (EX1010, claim 1.) Because the 2008 Provisional never disclosed the claimed housings or adapters, *see supra* § III.A.3, it cannot disclose the vertical positions at which they couple to the frame.

01122 Reply, 18

PO Argues Fig. 8 discloses claimed vertical positions



01122 POR, 24

A depiction of two seats at different heights does not convey possession of that relationship. As Mr. Prairie explained, a POSITA would not have believed the pre-2016 inventors possessed the “reasoning and details regarding the vertical positioning between the removable seats and ‘attachment adapters.’” (EX1001, ¶188.)

01122 Reply, 18-19

PO's textual argument

PO argues:

- “The seat attachment portion is capable of supporting a second stroller seat in front of the stroller seat 86’ and ‘[t]he front seat may be positioned substantially over the front wheels so the stroller remains stable.’”

01122 POR, 24

Pet. Reply:

- “[P]assages PO cites describe a front-to-rear arrangement, not the claimed vertical one.”
- “They place one seat ahead of the other and say nothing of housings coupled to the frame at successively lower positions.”

01122 Reply, 18

[1.3] “foldable support members extending . . . substantially within a plane”

“It is also undisputed that the pre-2016 filings provide no textual support for the claimed “substantially within a plane.”

“[I]t is undisputed that the patentee first expressly defined ‘substantially’ in the ’305 CIP, stating it ‘indicates that the equal relationship is not a strict relationship and does not exclude functionally similar variations therefrom[] [and] ... indicates that the equal relationship between the dimensions includes variations that, using mathematical and industrial principles accepted in the art (*e.g.*, rounding, measurement or other systematic errors, manufacturing tolerances, etc.)[.]’ (EX1017, 4.)”

Figures "depict only . . . strictly planar"

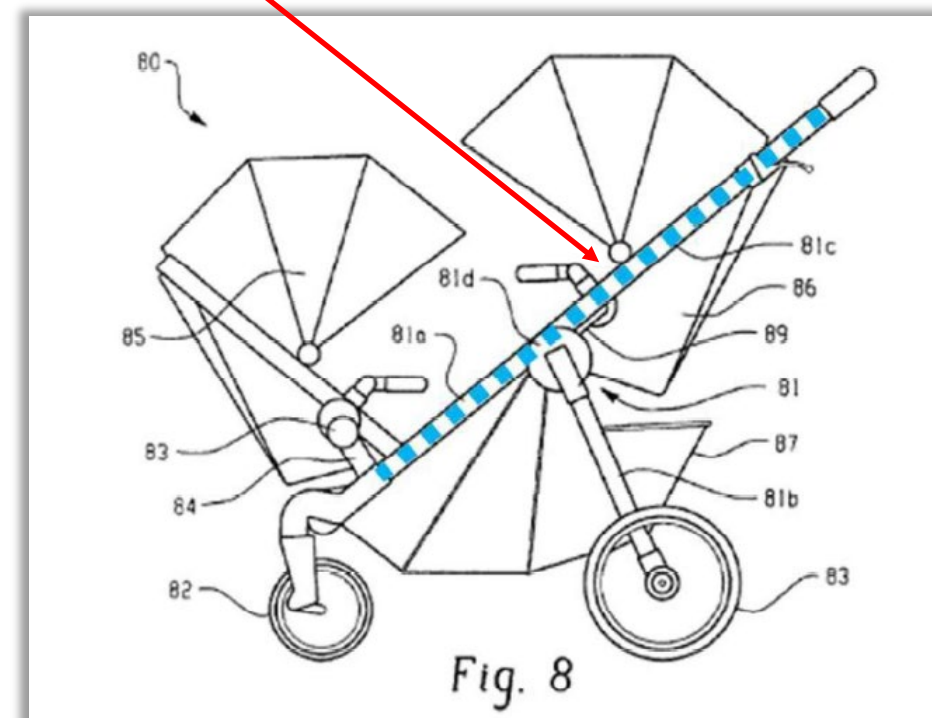
It is undisputed that all the 2008 Provisional figures depict a frame with support members in a strict plane in the deployed configuration. It is also undisputed that the pre-2016 filings provide no textual support for the claimed "substantially within a plane." (POR, 28-29; EX1002, 42-43; EX1003, ¶¶43-45; EX1004, 8:49-

01140 Reply, 26-27

226. All figures of the '305 CIP depict the frame (12 and 81) solely in a *strictly* planar relationship that "runs diagonally from the handle portion toward the front end portion." See, e.g., Figs. 1 and 8A below with purple lines showing the plane.

EX1001, ¶1226

Strict plane



EX1003, Fig. 8; 01140 Pet., 16

Dr. Cameron argues that Fig. 8 of the 2008 Provisional and 2009 Non-provisional supports "substantially within a plane" because it shows a folding mechanism

- Dr. Cameron's testimony independently fails because:
 - it cannot satisfy the demanding standard for inherent written description
 - Expert opinion cannot gap fill a lack of disclosure in the specification because it is the specification itself that must demonstrate possession.

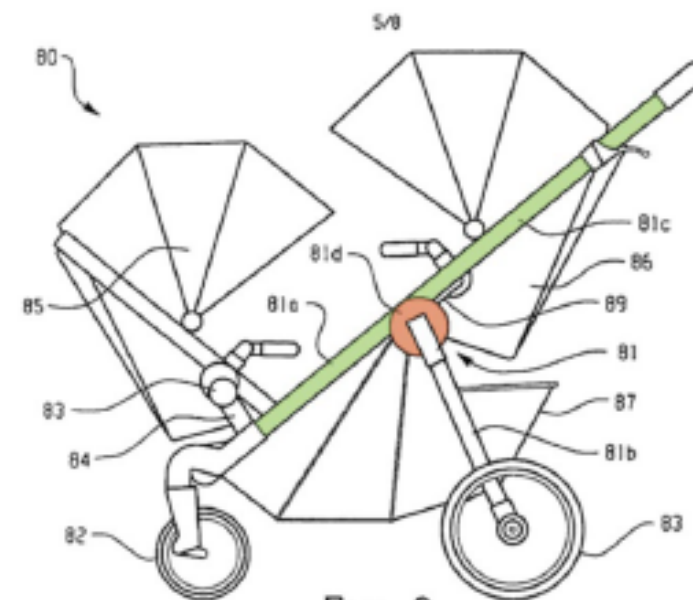
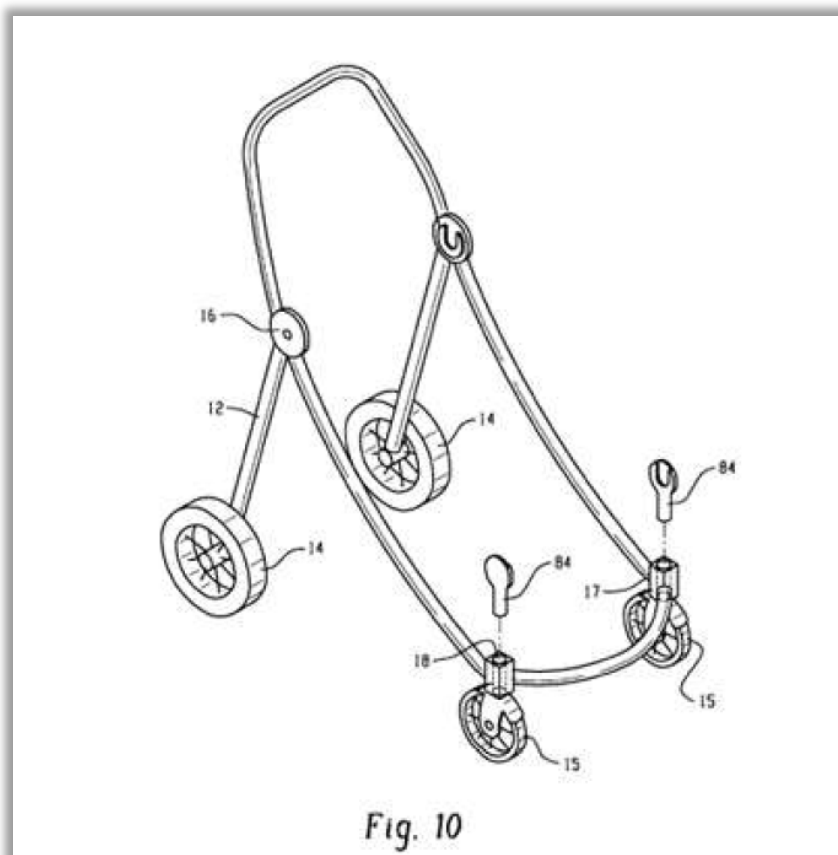


Fig. 8

EX2011, ¶68

PO argues that new Figure 10 supports "substantially in a plane"



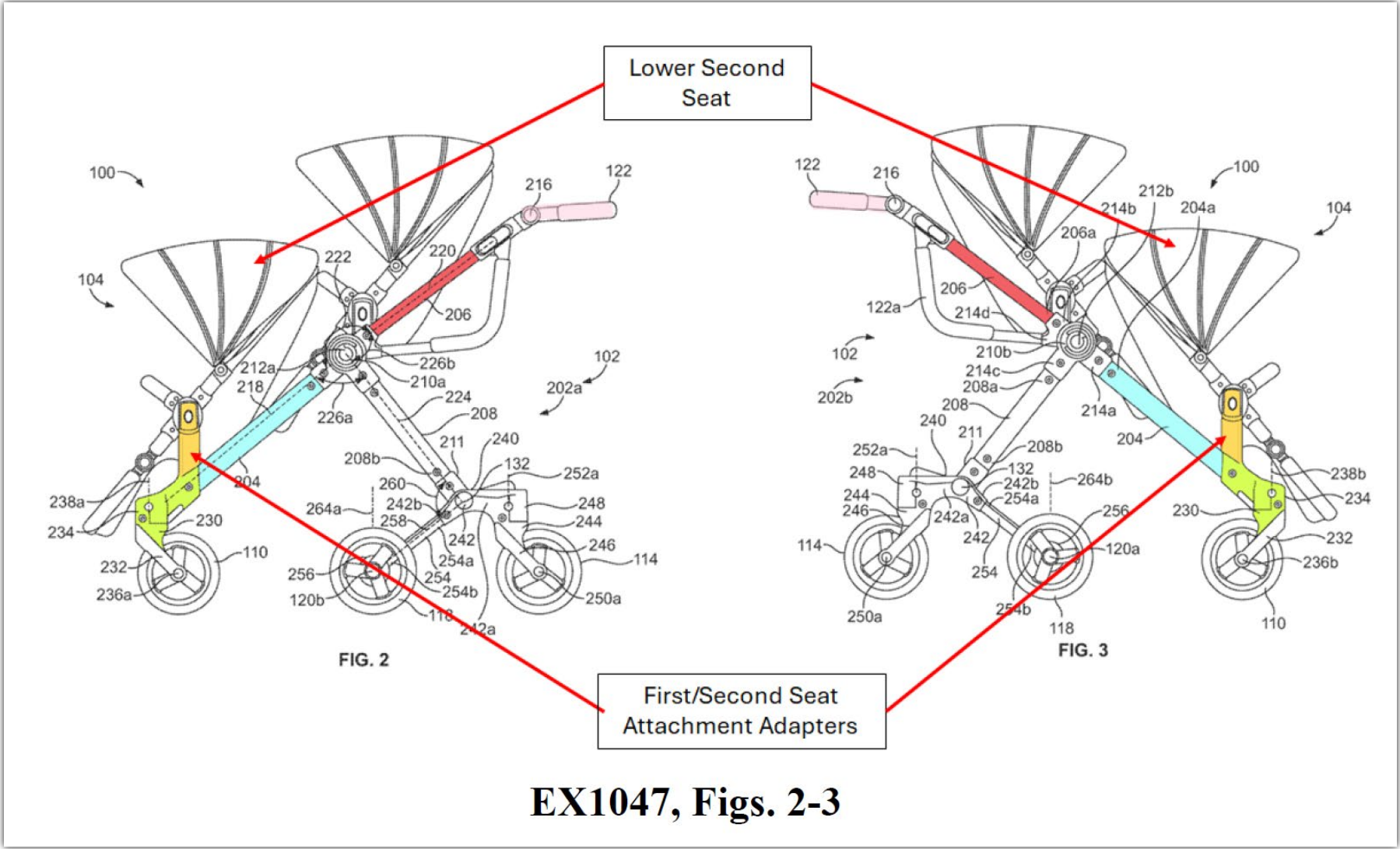
EX1014, 233

- "Figure was introduced after Rolicki's March 14, 2013 filing date"
- "Figure 10 shows a curved stroller frame."
- "A curved stroller frame does not have 'foldable support members extending . . . substantially within a plane'"

'682 PATENT

IPR2025-1122 (U.S.P.N. 11,731,682)

Rolicki renders obvious all challenged claims



Overview of Liao

227. The detailed drawings of Liao are a type of wire frame isometric drawings a POSITA would understand are typically obtained from a CAD software design program. These detailed drawings are what a POSITA would typically use and rely upon when analyzing the details for stroller designs. A POSITA would therefore be able to understand and use the drawings provided in Liao for assessing functional features even though there is not an extensive written disclosure.

EX1001, ¶227

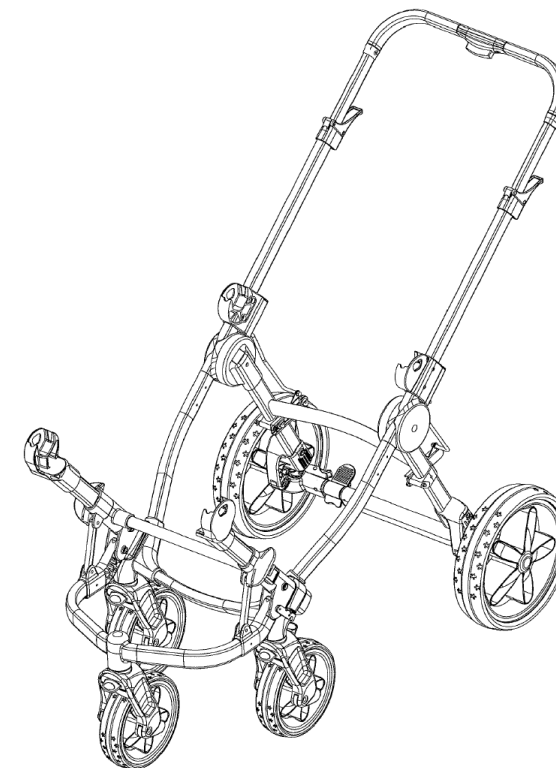
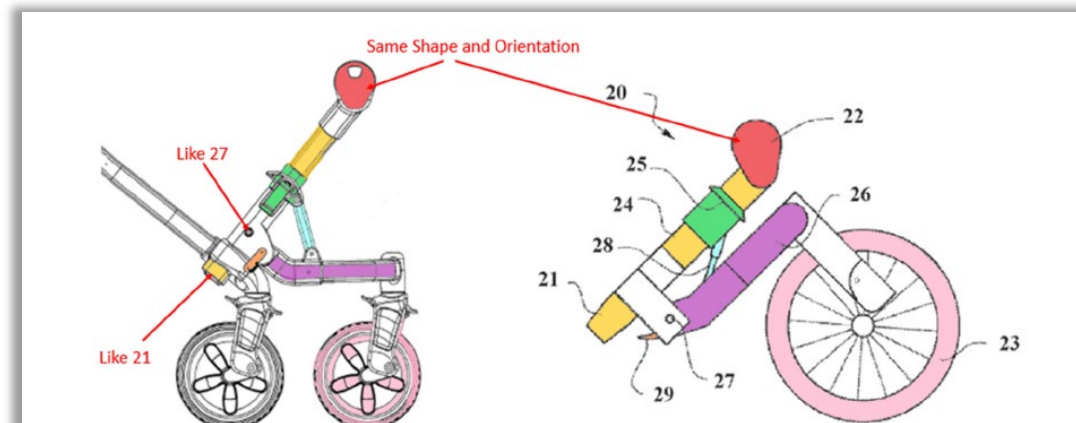
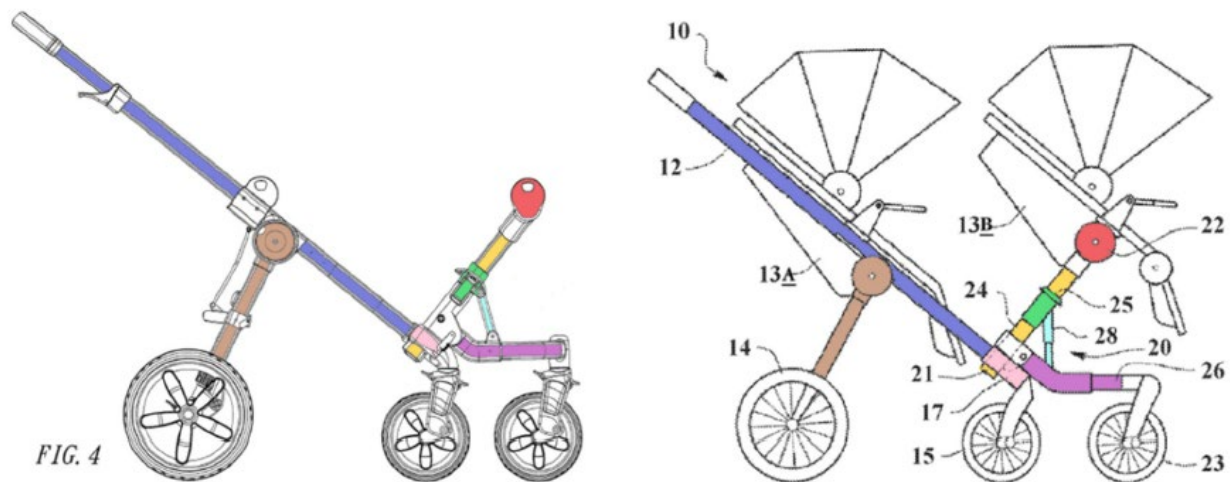


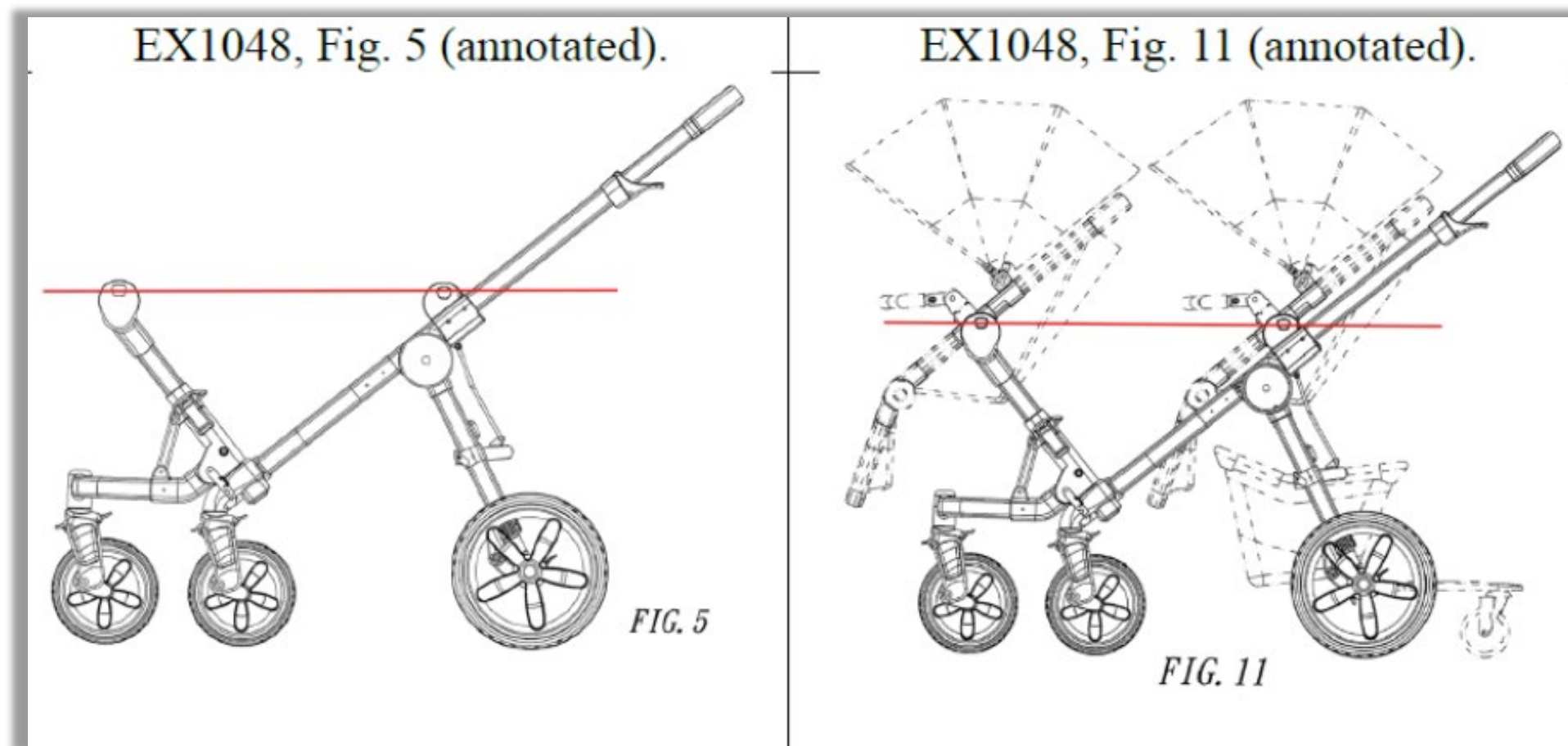
FIG. 1

EX1048, Fig. 1

Liao's design illustrates similar features as those shown by the '682 Patent

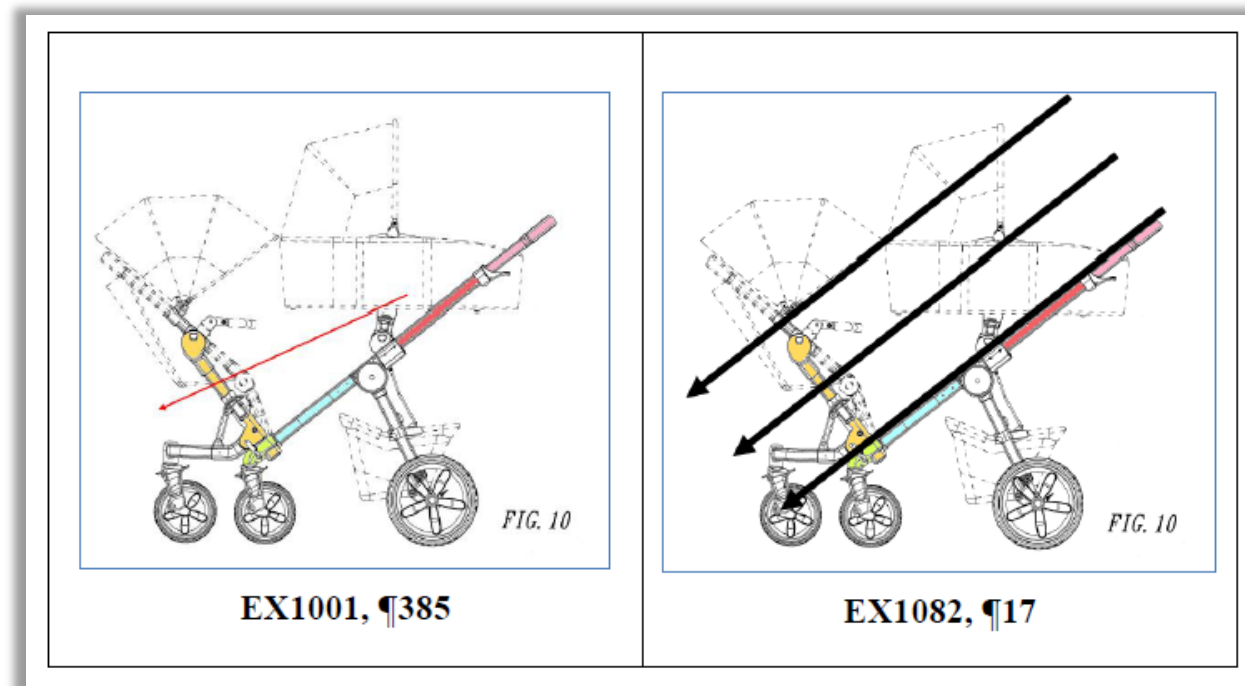
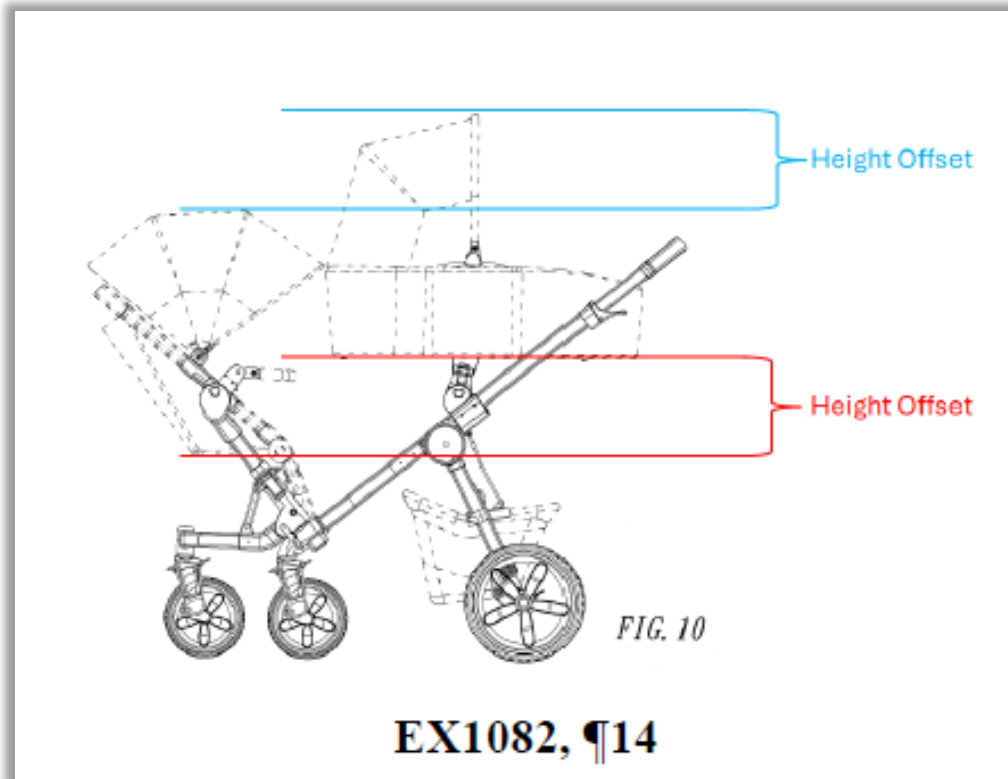


Dr. Cameron's ¶¶85-89 argues "[t]hese figures show the connection points . . . are at the same vertical level"

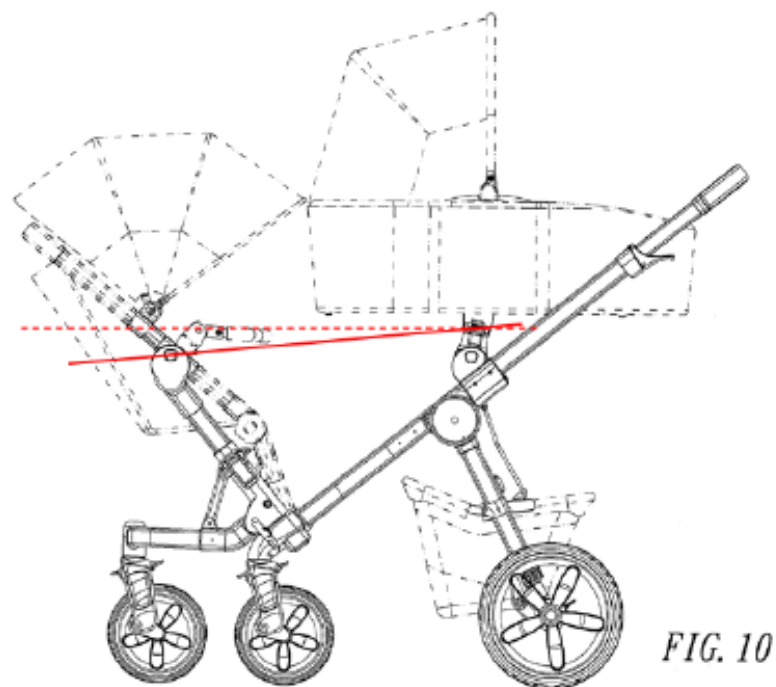


01122 Reply, 20

[1.8] - Liao discloses seats “arranged in an inline descending configuration”

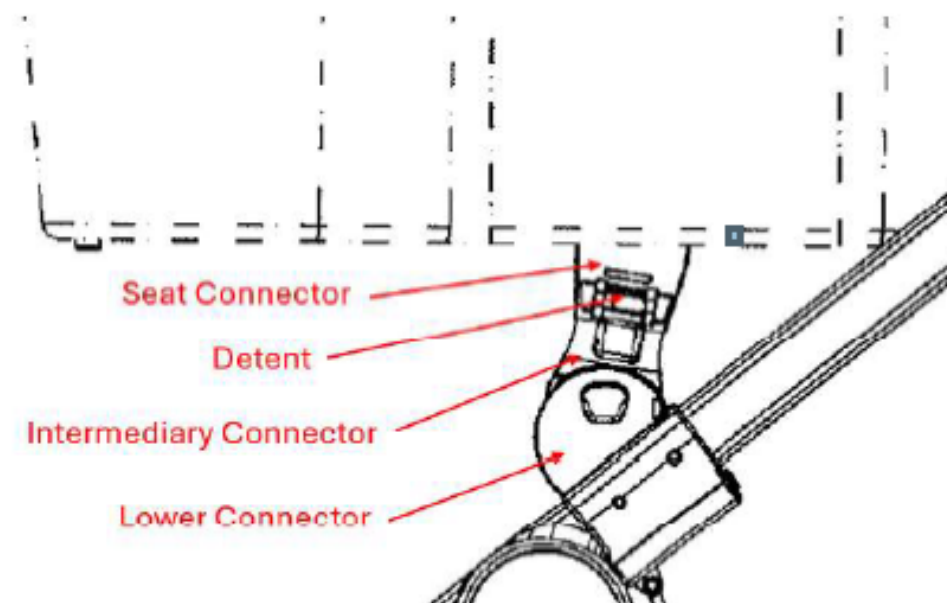


Even if the Board adopts PO's construction, Liao still renders limitation [1.8]



EX1082, ¶20

01122 Reply, 24



EX1048, Fig. 10 (Annotated and Magnified)

EX1082, ¶18

Prosecution history of '417 Application corroborates petition

- In the child '417 application, “Examiner rejected claims similar in scope to those of the '682 Patent as anticipated by Liao alone”

01122 Pet., 57

- In the '417 application, “PO never disputed the Examiner’s finding regarding what Liao teaches as used in Ground 2”

01122 Pet., 58, n.15

14. **Claims 2-16 are rejected under 35 U.S.C. 102(b) as being anticipated by Liao (US D593,459).**

[Claim 2] Regarding Claim 2, Liao discloses: A convertible stroller (See, e.g., Fig. 1-13) configured for being converted from a single stroller to a double stroller (See, e.g., Fig. 1-13), the stroller comprising: a stroller frame (See, e.g., Fig. 1-13) configured for being adjusted between a folded configuration and an unfolded configuration (See, e.g., Fig. 1-13), the stroller frame comprising: a handle portion (See, e.g., Fig. 1-13); a front wheel support portion (See, e.g., Fig. 1-13); and a back wheel support portion (See, e.g., Fig. 1-13); and at least one front wheel secured to the stroller frame's front wheel support portion (See, e.g., Fig. 1-13); two rear wheels secured to the stroller frame's back wheel support portion (See, e.g., Fig. 1-13); a first seat (See, e.g., Fig. 1-13) removably attached to the stroller frame (See, e.g., Fig. 1-13); one or more seat attachment portions removably attached to the stroller frame (See, e.g., Fig. 1-13); and a second seat (See, e.g., Fig. 1-13) removably attached to the one or more seat attachment portions (See, e.g., Fig. 1-13) and positioned in front of the first seat (See, e.g., Fig. 1-13); wherein at least one of the first seat and the second seat is configured for being removably attached to the stroller frame in a forward-facing configuration and a backward-facing configuration (See, e.g., Fig. 11-12); and wherein the first seat and the second seat are positioned such that a center of gravity of the stroller is between the at least one front wheel and the plurality of back wheels (See, e.g., Fig. 1-13).

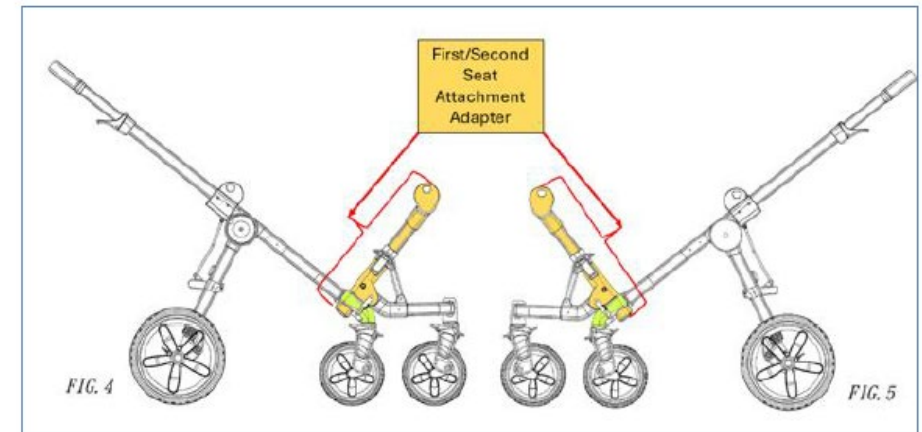
EX1024, 1203

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

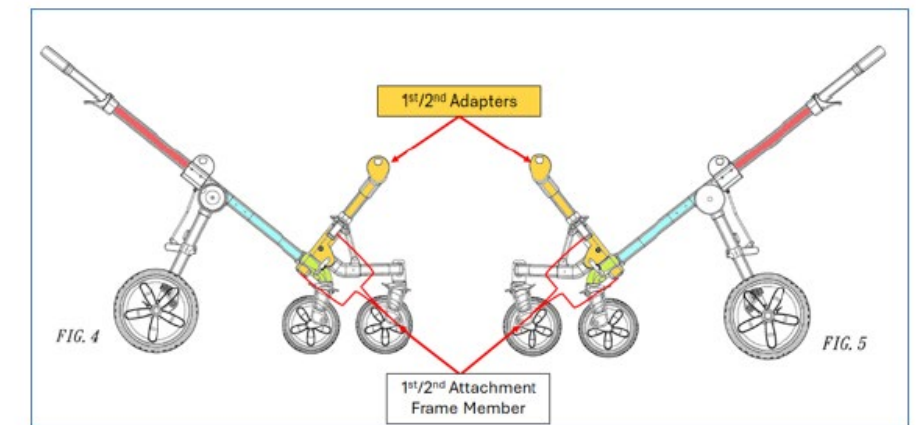
Liao discloses the “seat attachment adapters” of [1.6]/[1.7]

PO’s charge that Petitioner’s mapping is internally inconsistent misreads the Petition. (POR, 47.) Mr. Prairie identified the **entire gold-shaded structure as the seat attachment adapter**. (EX1001, ¶379.) He then explained that a **portion of that adapter, spaced from the housing yet still allowing the adapter to be inserted and coupled, is what a POSITA would understand as the claimed “attachment frame member.”**

01122 Reply, 25



EX1001, ¶379.

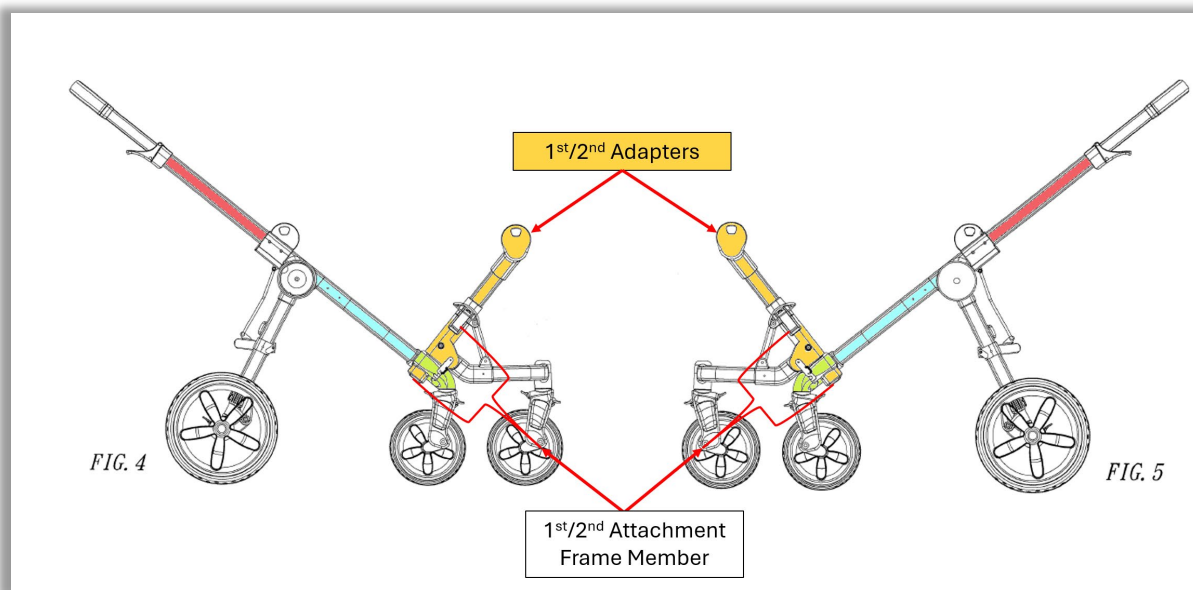


EX1001, ¶380.

01122 EX1001, ¶¶379-380

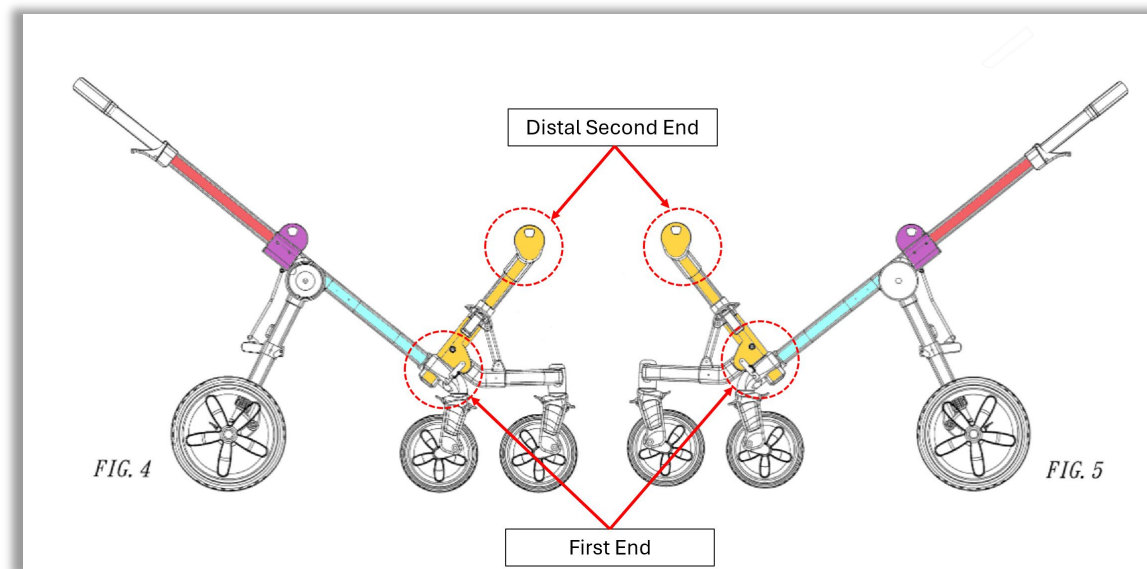
PO argument pertaining to claims 4 and 5 fares no better

4. The stroller of claim 2, wherein each of the first seat attachment adapter and the second seat attachment adapter has a first end and a distal second end.



01122 EX1001, ¶380

5. The stroller of claim 4, wherein the first end comprises the respective first connector portion or the second connector portion and, and the first end is releasably connected to the respective first seat attachment housing or the second seat attachment housing.



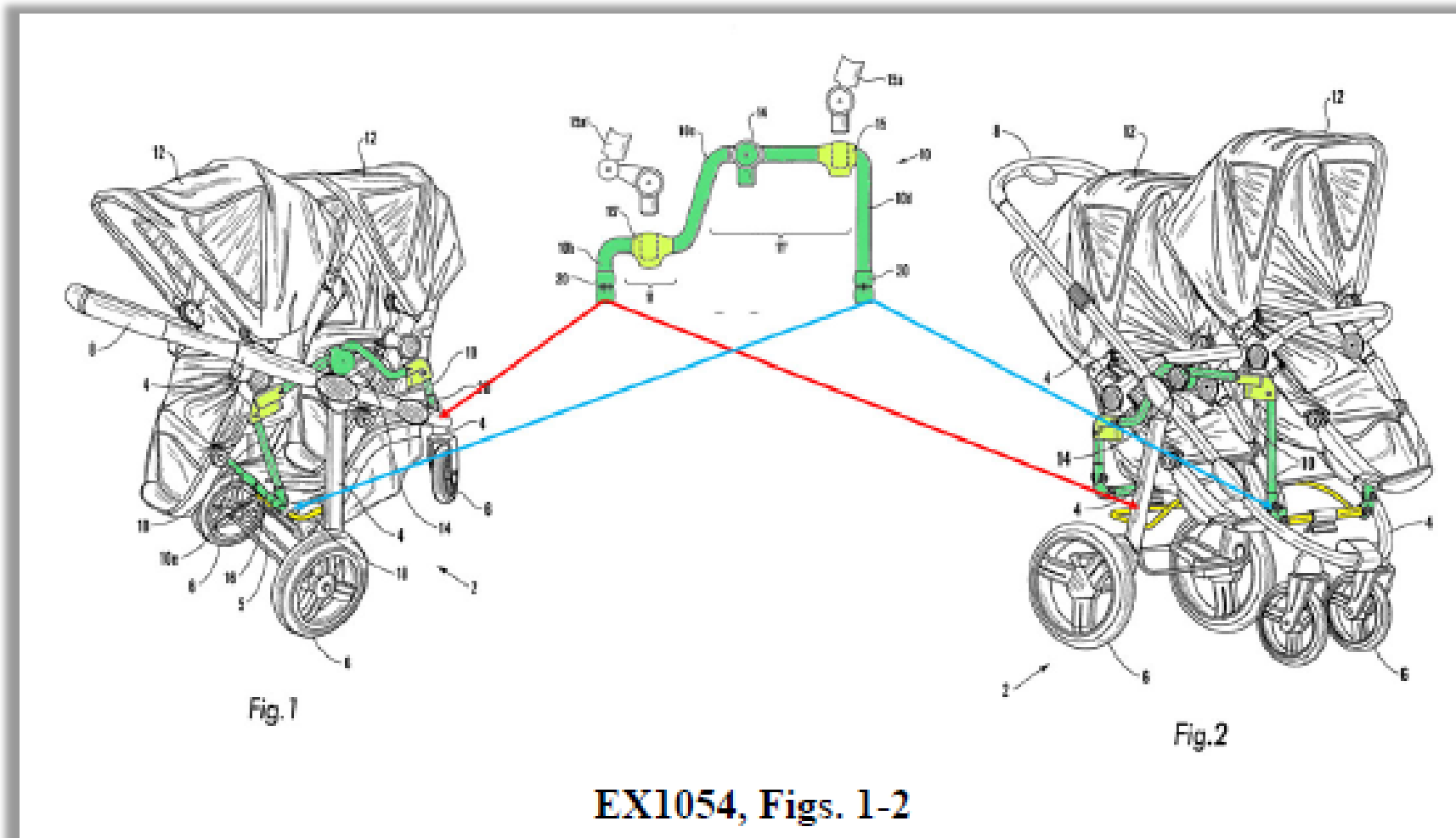
01122 EX1001, ¶399

'682 & '771 PATENT

IPR2025-1122 (U.S.P.N. 11,731,682)

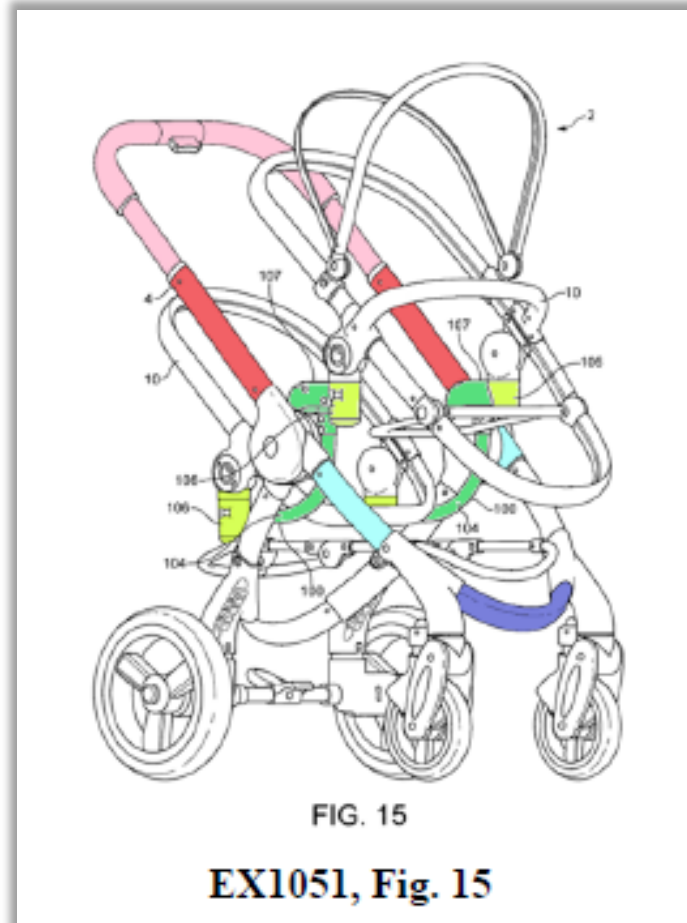
IPR2025-01140 (U.S.P.N. 11,571,771)

Overview of Offord '797

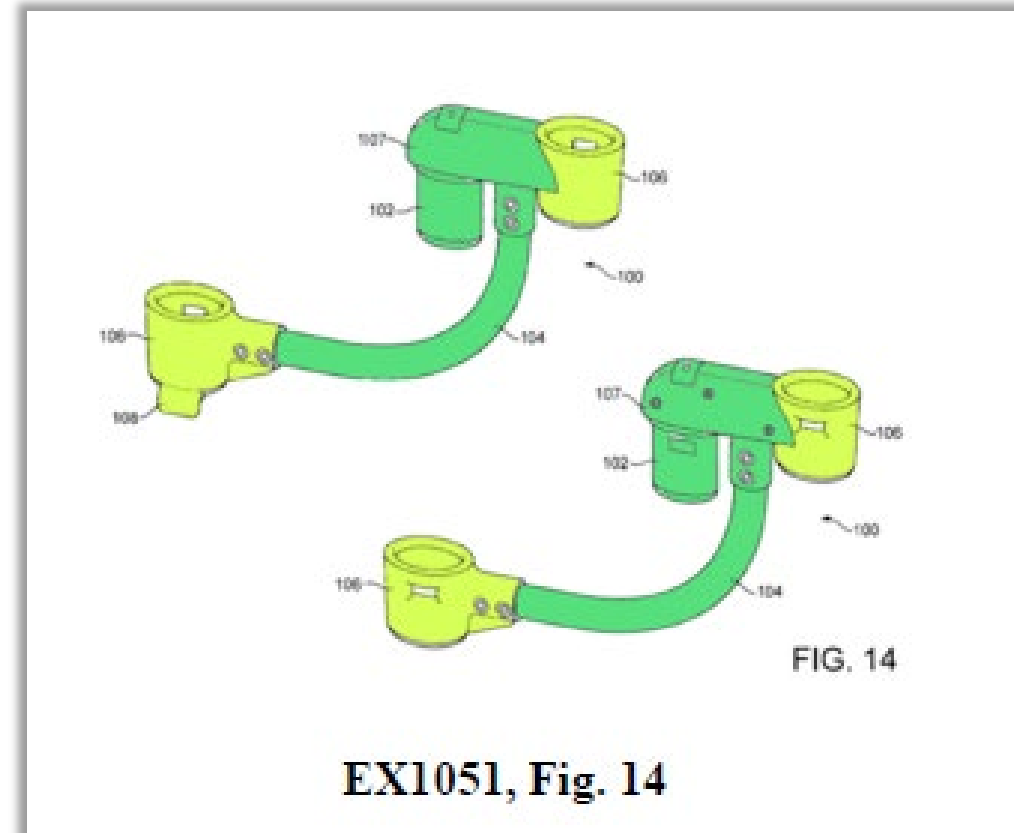


01122 Pet., 30, 98; 01140 Pet., 28

Overview of Offord '341



01122 Pet., 97



01122 Pet., 96

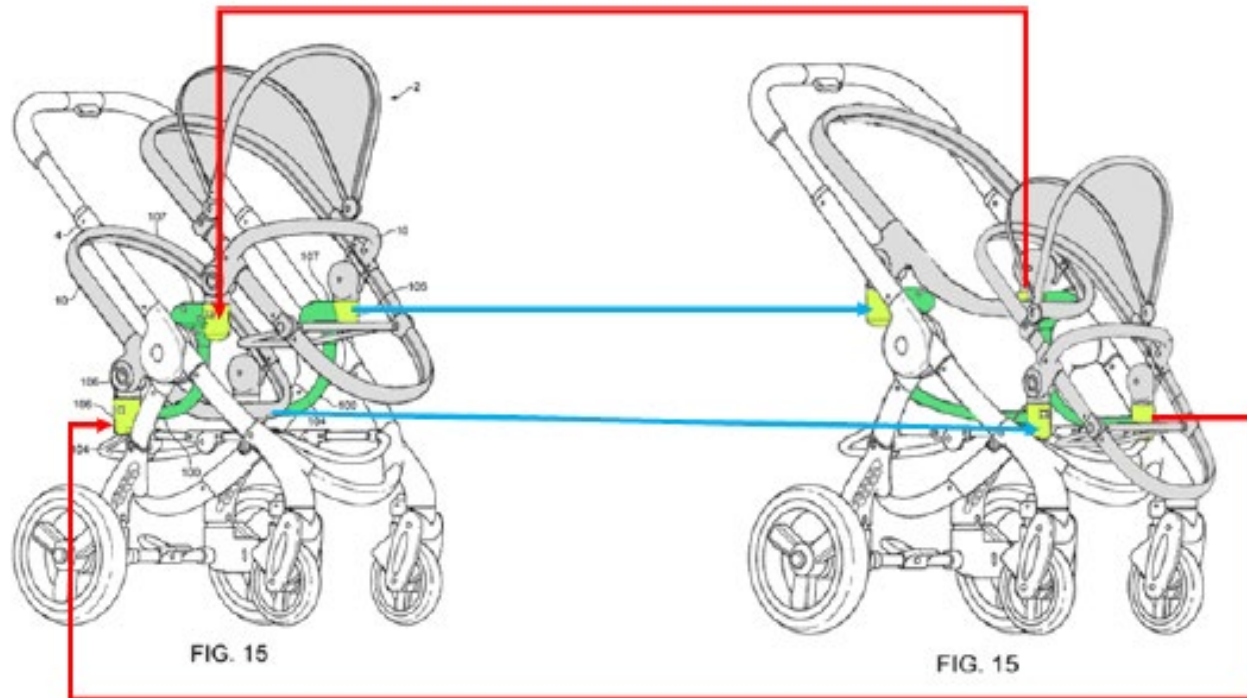
Interface components 100 are adjustable

“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.” EX1051, 9:37-42

Claims 1-16 are Obvious in view of Offord '341 & Offord '797

- “A POSITA would have understood . . . that the interface components 100 were reversible.”
- “It would have been obvious to reverse the orientation of the sub-frame of Offord '341 as taught by Offord '797”
- “Offord '341 expressly cites Offord '797. . . similar sub-frame 10”
- merely the “application of a known technique to a similar device with predictable results”

The interface components 100 (sub-frame) were reversible



EX1051, Fig. 15 (left) and Fig. 15 (right, modified)

In addition, on the inner side of the lower connector sockets 106 there is a downwardly curved lug 108 which serves to rest upon a part of the basket frame 44, such that the weight of two infants is fully supported by the frame assembly 4. A similar sub-frame arrangement is disclosed in WO 2008/040797.

(EX1051, Offord '341, 9:32-36.)

is disclosed in WO 2008/040797.” (EX1051, Offord '341, 9:35-36.) A POSITA seeing this statement would be directed to review WO 2008/040797 (“Offord '797”) to find out more about the disclosed “interface portion components 100.” A POSITA, like me, would understand Offord '797 provides more details about an “interface portion” that allows a stroller to be modified as a double-seat configuration. A POSITA, like me, would have also been motivated to review the teachings of Offord '797 to determine if they could be applied to the teachings of Offord '341.

PO's discouragement theory misframes the obviousness inquiry

- PO's alleged structural differences are at most implementation details
- Offord '341 does not teach away from reversibility nor does reversing the interface components 100 create inoperability

Dr. Cameron's alleged discouragement:

- Increased risk of forward tipping (EX2011, ¶158)
- Asymmetrical detents (EX2011, ¶¶134-138)
- Lug interference (EX2011, ¶139)

Reversing the interface components 100 would not make the stroller unstable

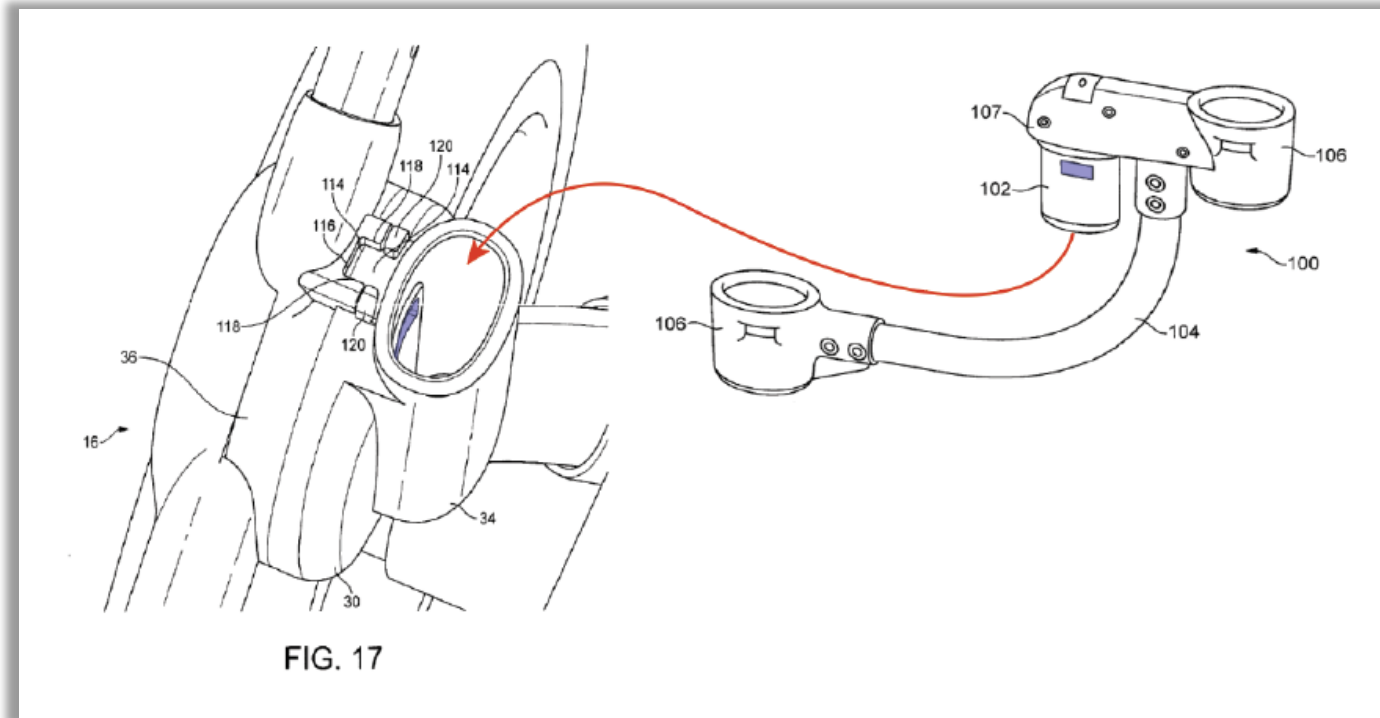
“These paragraphs provide a roadmap for how to maintain stability by properly selecting limits on the amount of adjustment for the interface components 100.”

Mr. Prairie, EX1082, ¶30

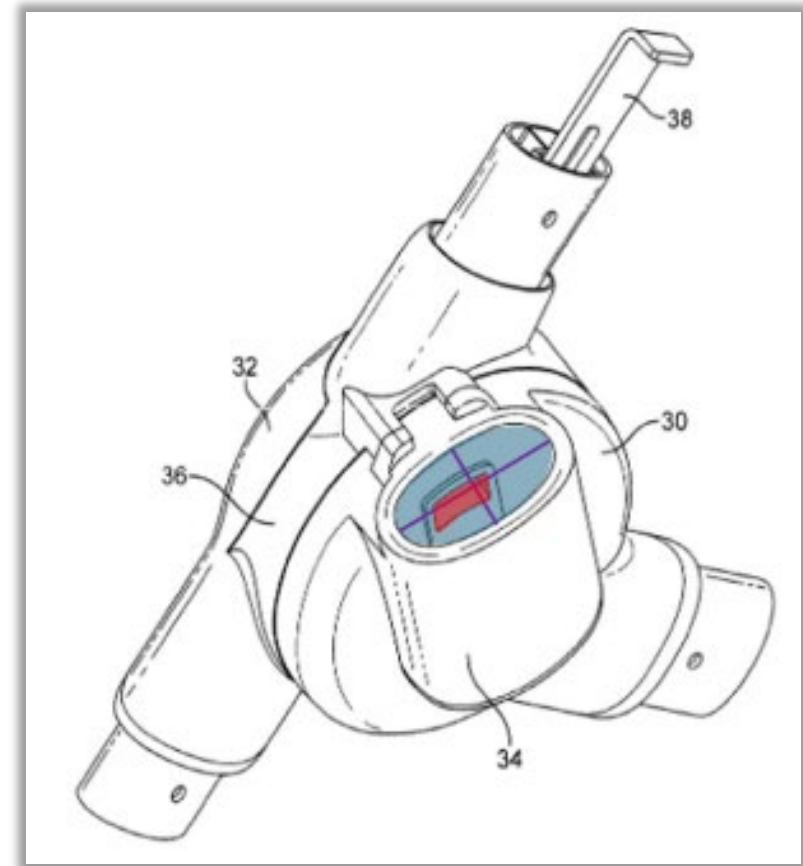
Such adjustment is advantageous in prolonging the useful life of the vehicle 2, as it will “grow” with the infants being transported by it, and whom will remain comfortably accommodated. However, the adjustment must be kept within safe limits, such that the child-carrying units remain as close to the centre of gravity of the vehicle 2 as possible to prevent any possibility of dangerous tilting or toppling over of the vehicle 2.

EX1051, 9:45-52

PO argues connecting legs 102 are not reversible in receptor cups 34

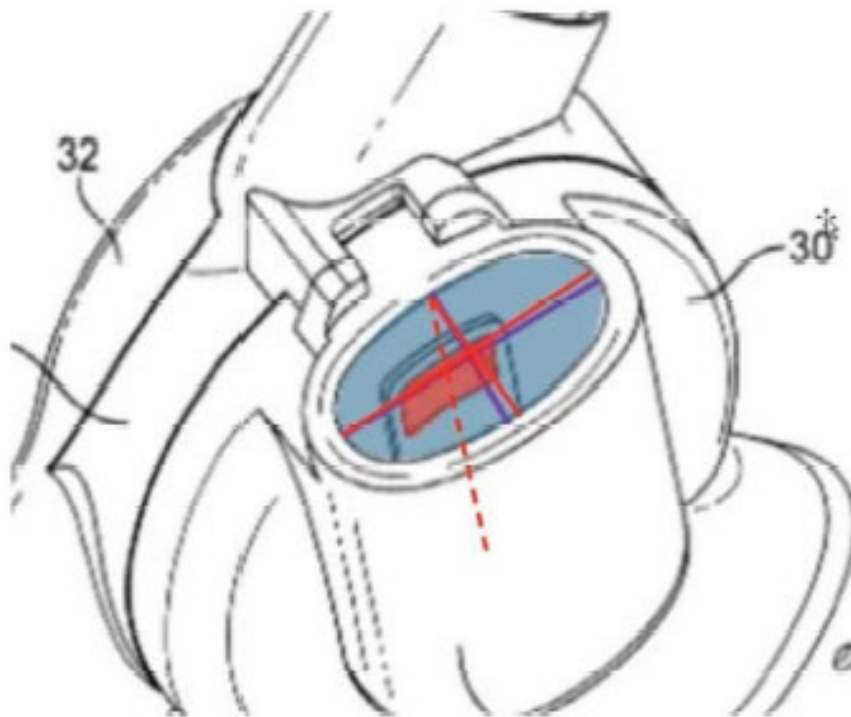


01140 POR, 67



EX2011, ¶135, Fig. 4

“Dr. Cameron’s annotated figure and the purple minor axis of the elliptical cup 34 is drawn incorrectly.”



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

EX1082, ¶36

Connectors of Offord '341 are symmetrical allowing reversal

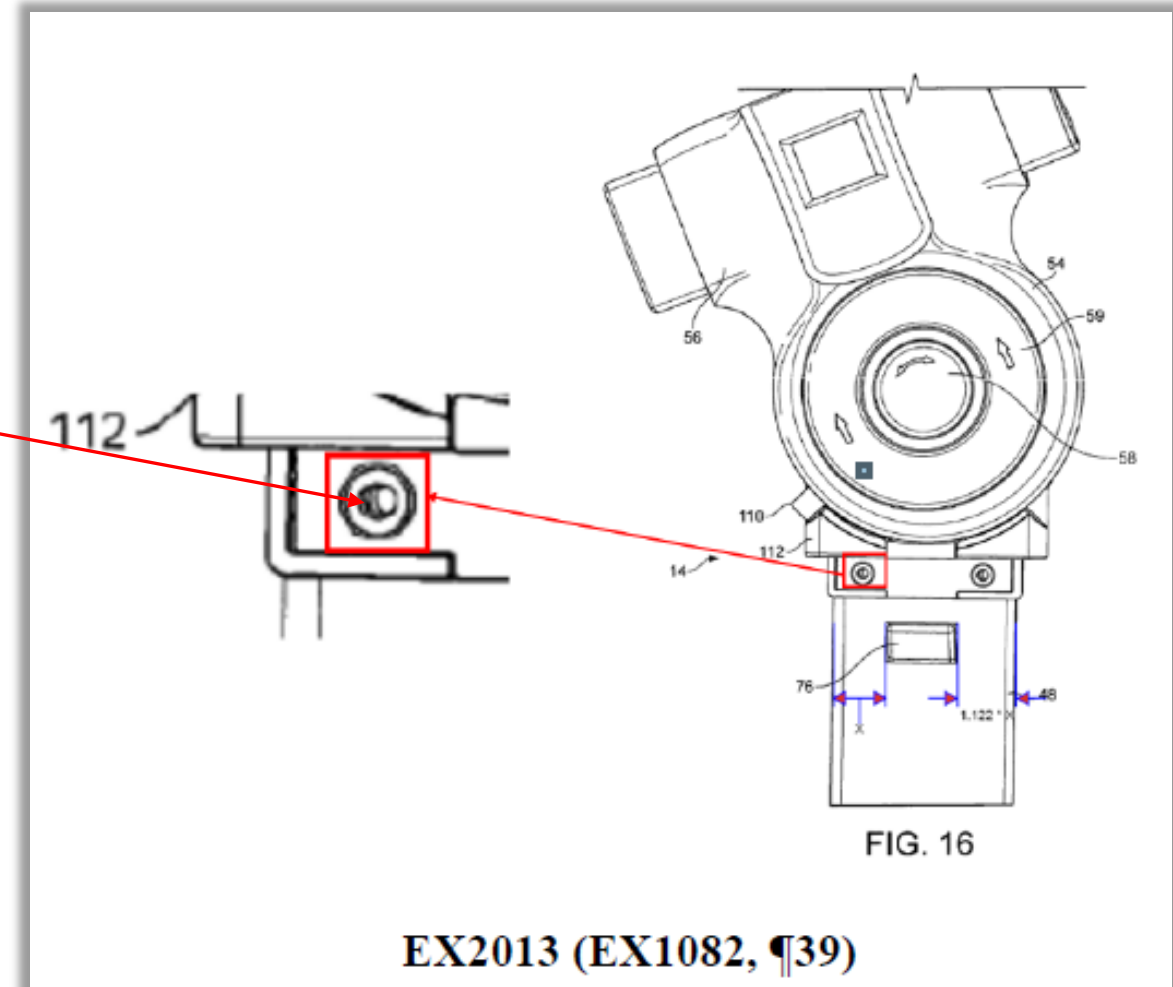
of a drawing are of little value.”) Here, the reference is silent as to any dimensions in this drawing.² Moreover, PO's measurements assume a direct elevation view, yet the drawing shows threads in the screw holes, indicating a perspective angle.

0122 Reply, 31

Finally, if centering the detent a few millimeters were all that prevented reversibility, that minor modification would plainly be within the skill of a POSITA.

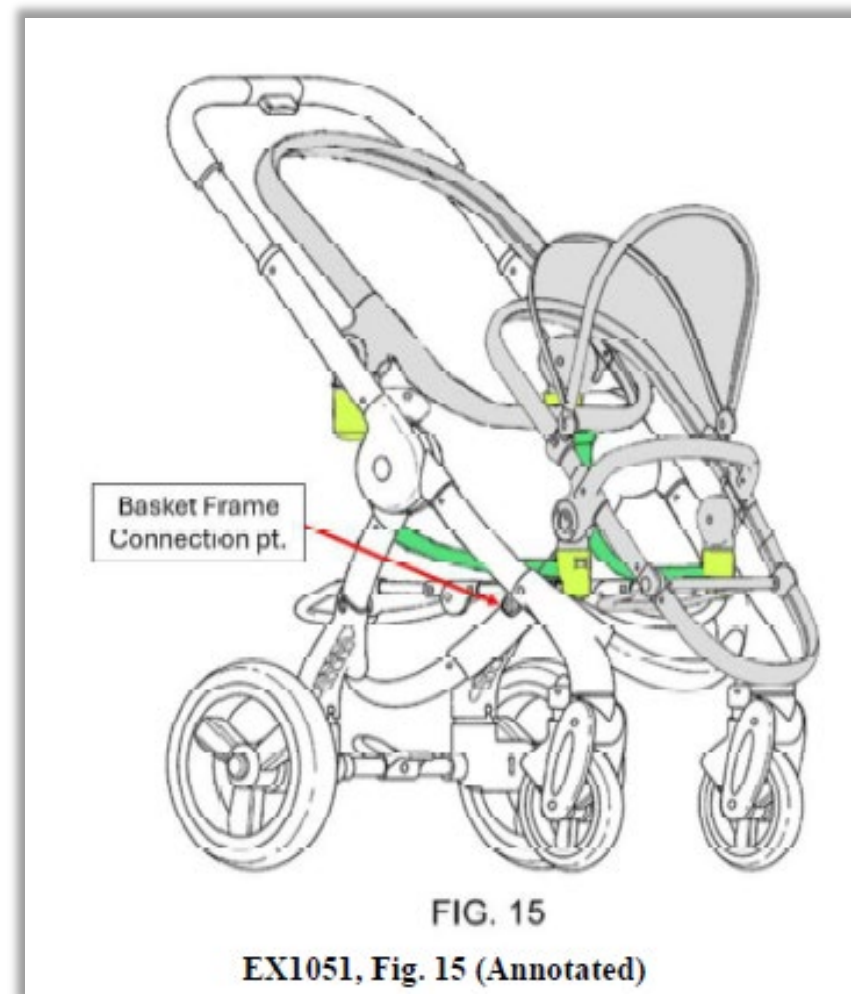
(EX1082, ¶¶42-45.)

0122 Reply, 31-32



Lugs 108 would not prevent reversibility

- Dr. Cameron was equivocal: “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 failed to consider lug 108 rests on the inside of the basket frame 44, not on the outside where the basket frame 44 connects. (EX1082, ¶47)
- Lug 108 sits forward of basket-frame connection (EX1082, ¶49)
- Interface components 100 are adjustable (EX1082, ¶50)

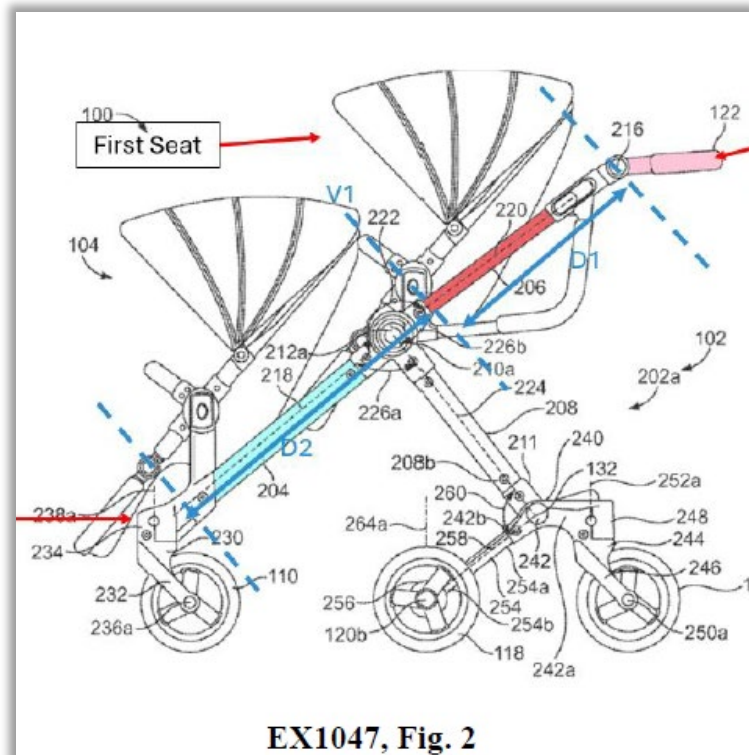


EX1082, ¶49

'771 PATENT

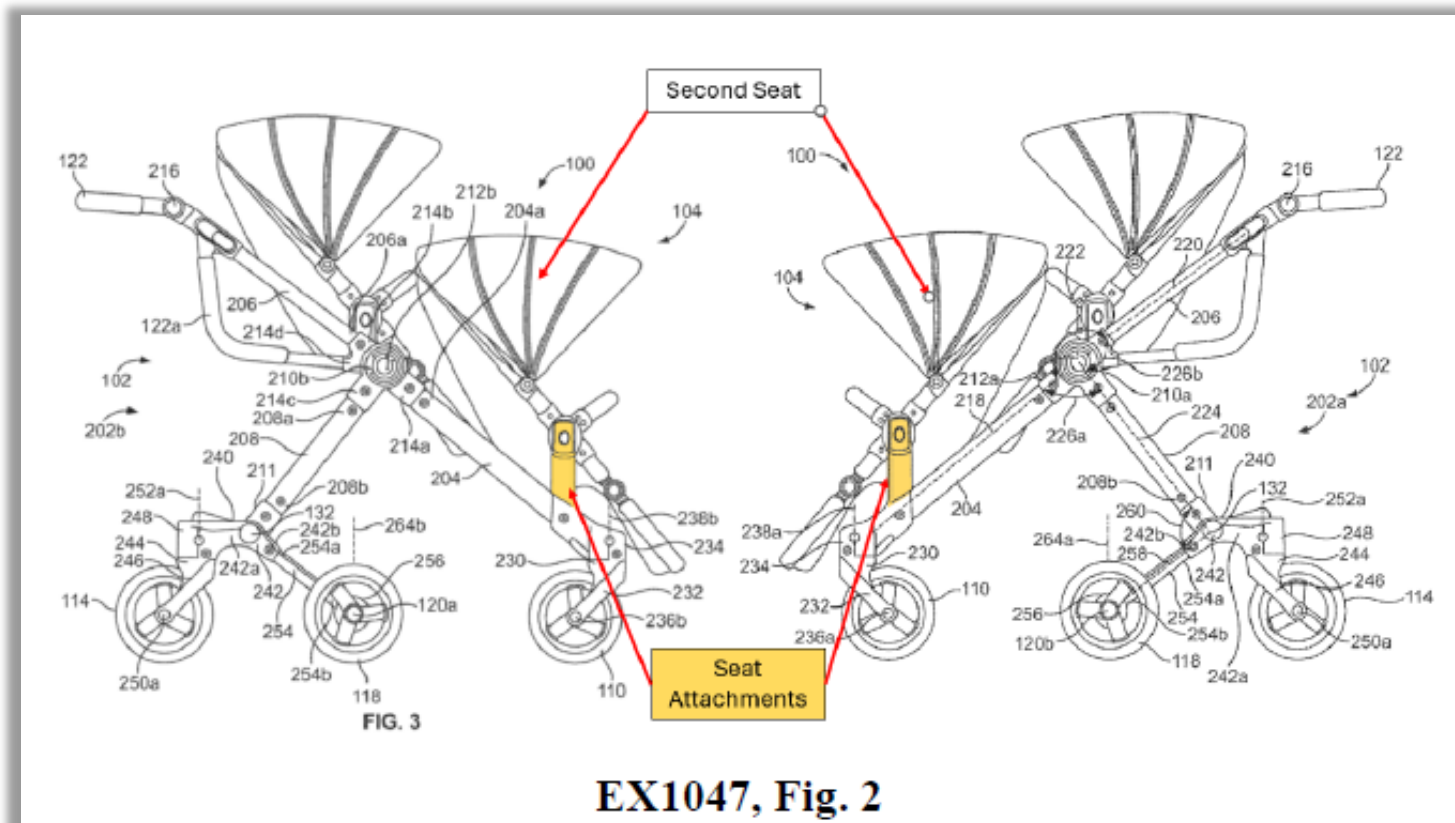
IPR2025-01140 (U.S.P.N. 11,571,771)

[1.4]/[1.5d] seats being connectable in either a forward or backward facing position



EX1047, Fig. 2

01140 Pet., 37



EX1047, Fig. 2

01140 Pet., 42

Rolicki discloses [1.4]/[1.5d] even under PO incorrect construction

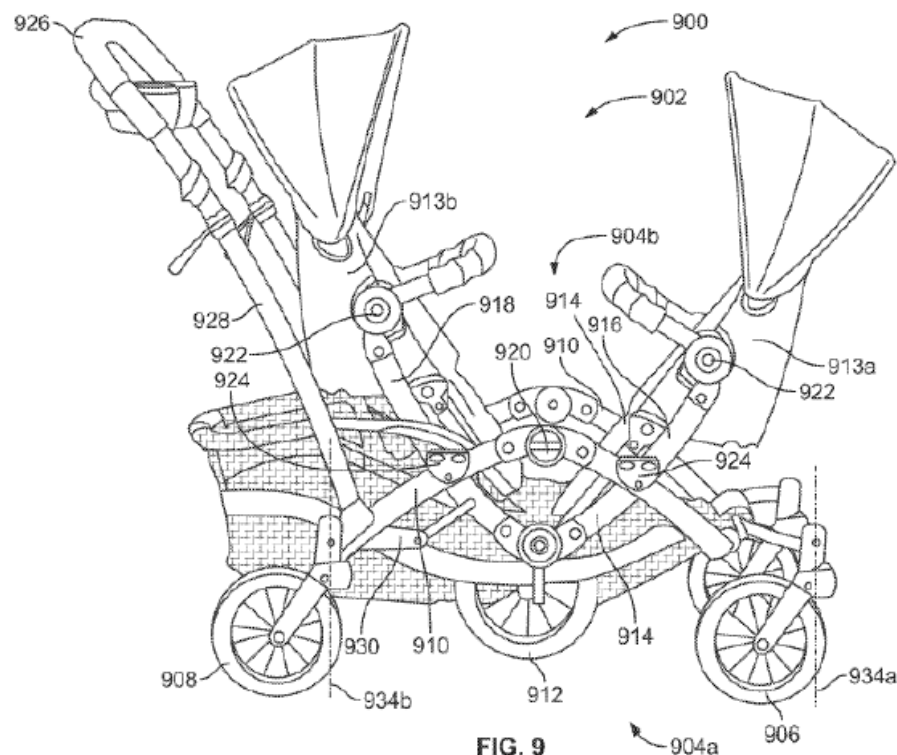


FIG. 9

EX1050, Fig. 9

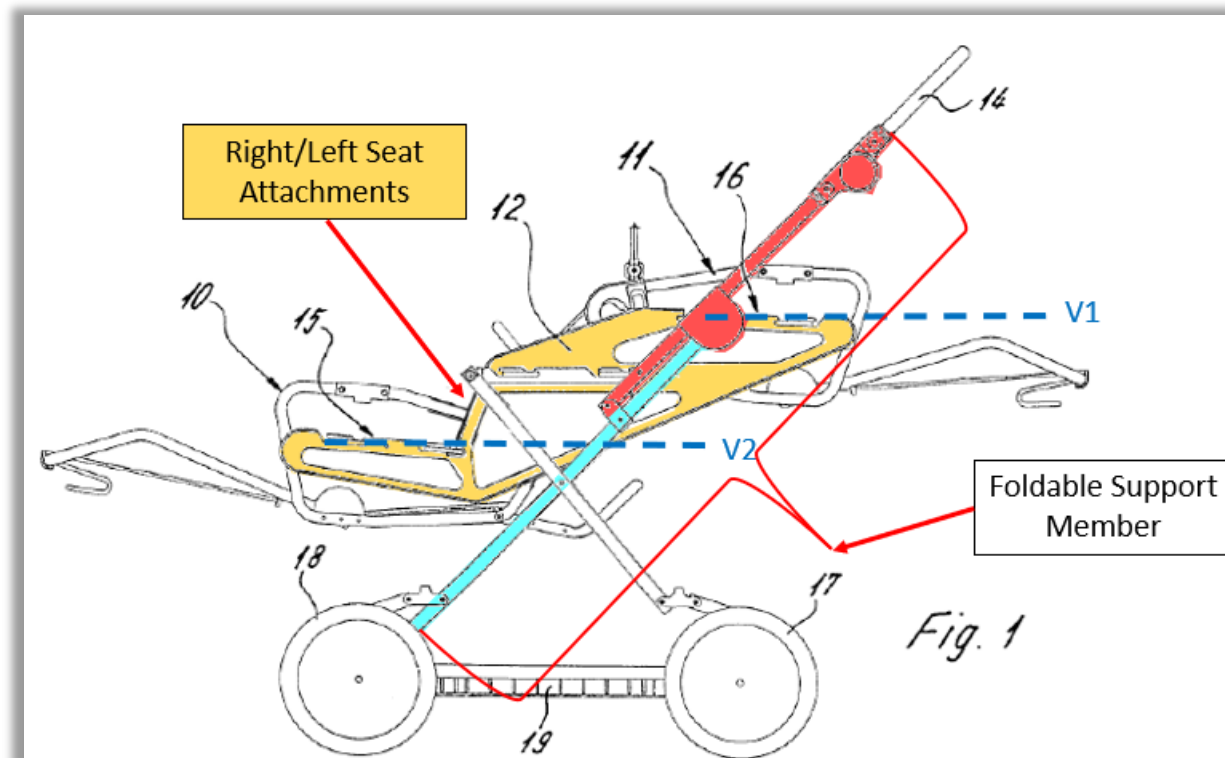
Even if both removable and reversible seats are required, the Challenged Claims are obvious because WO '157 discloses that structural capability and reversible stroller seats were a known, desirable feature before the claimed priority date. (EX1050, Fig. 9, ¶¶0012, 0063, 0068-0069; EX1001, ¶¶52-65; EX1082, ¶21.)

01140 Reply, 30-31

Gotting discloses [1.5b] “right and left seat attachments disposed along the right and left support members of the frame.”

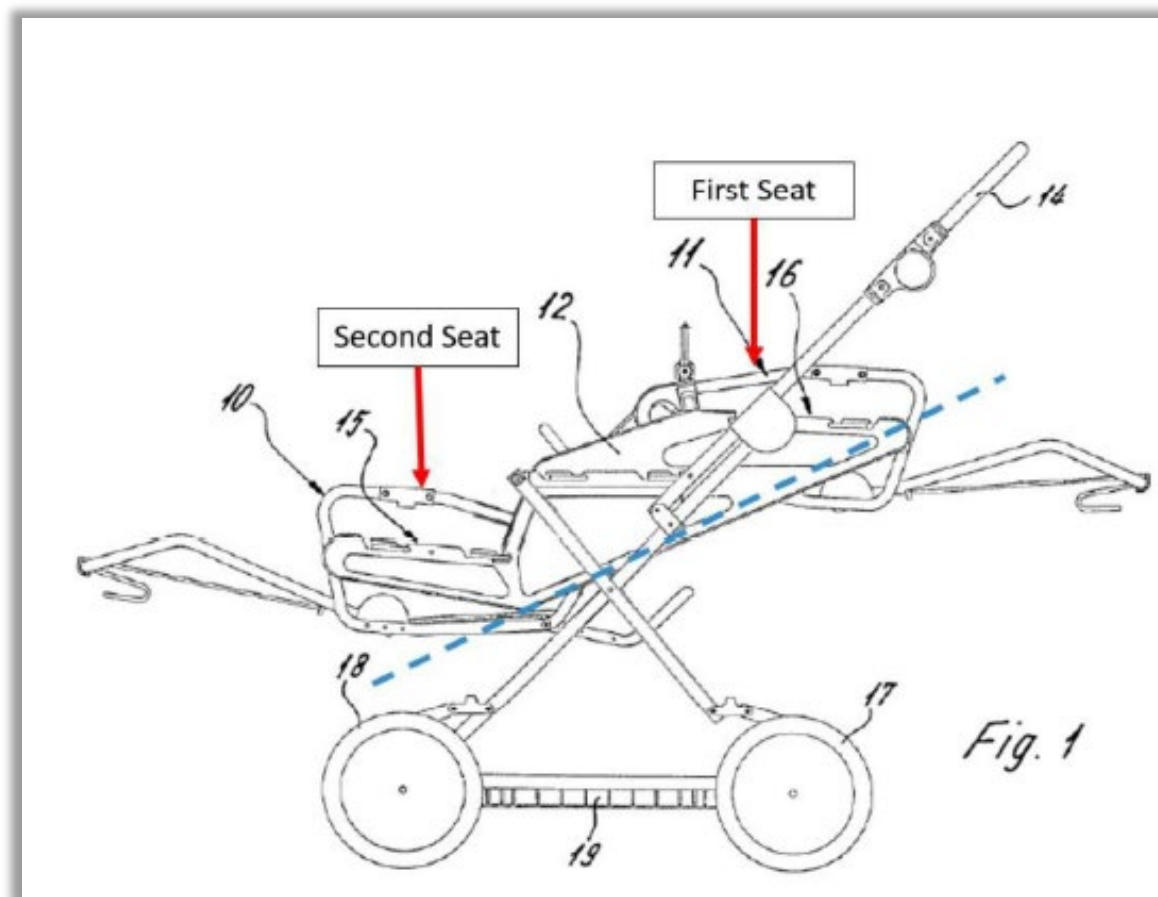
“The adapters 12 are therefore necessarily “disposed along” those members, because their placement and function are dictated by and extend from the support members. That is all the claim requires.”

Reply, 32-33



Pet., 69

Gotting discloses [1.5e] “seat[s], when connected to the frame, are arranged in an inline descending configuration substantially along the plane of the frame.”



EX1041, Fig. 1