IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

COLE HAAN LLC, Plaintiff, v. TOP GLORY TRADING GROUP INC. AND DP DREAM PAIRS INC., Defendants.	Case No. 2:25-cv-00176-ES-SDA Hon. Esther Salas Hon. Stacey D. Adams, U.S.M.J. **COLE HAAN LLC'S EXCHANGE OF PRELIMINARY CLAIM CONSTRUCTIONS AND EXTRINSIC EVIDENCE**

Pursuant to LPR 4.2 and the Initial Pretrial Scheduling Order (ECF No. 49), Plaintiff Cole Haan LLC makes the following identification of preliminary claim constructions and identifies the intrinsic and extrinsic evidence supporting the same.

By making this disclosure, Cole Haan does not waive any applicable privilege or immunity or any other protection or objection. Cole Haan also identifies and reserves the right to use any extrinsic evidence disclosed by Defendants in their claim construction disclosures.

Claim Term	Cole Haan's Proposed Construction	Intrinsic Evidence	Extrinsic Evidence
wingtip pattern ('511 Patent claims 1, 15; '163 Patent claims 1, 13, 14, 18)	No judicial construction necessary as the term can be understood with its plain and ordinary meaning	**'511 patent** • Claims 1, 15 • Figures 1-5[1] • 4:19-6:44 **'163 patent**	

[1] All references to the figures of the '511, '163, and '262 patents include and incorporate by reference the images maintained in the SCORE database by the USPTO, available via the supplemental content tab in Patent Center.

		• Claims 1, 13, 14, 18 • Figure 1-5 • 4:21-6:46	
line of broguing / [medial/lateral] line of broguing (’511 Patent claims 1, 17, 20; ’163 Patent claims 14, 19, 20, 22, 23; ’262 Patent claims 1, 2, 7, 8)	“broguing” means holes formed during the knitting process, as opposed to being formed via removal of material (e.g., punching, cutting, etc.) The remainder of the terms can be understood with their plain and ordinary meaning	**’511 patent** • Claims 1, 17, 20 • Figures 1-5 • 4:30-60 **’163 patent** • Claims 14, 19, 20, 22, 23 • Figure 1-5 • 4:32-62 **’262 patent** • Claims 1, 2, 7, 8 • Figure 1-5 • 4:46-5:9	
wing-shaped curved line (’511 Patent claims 1, 15; ’163 Patent claims 1, 13, 14, 18)	No judicial construction necessary as the term can be understood with its plain and ordinary meaning	**’511 patent** • Claims 1, 15 • Figures 1-5 • 4:30-5:26 **’163 patent** • Claims 1, 13, 14, 18 • Figure 1-5 • 4:32-5:28	
[medial/lateral/central] broguing portion (’511 Patent claims 1, 2; ’163 Patent claims 14, 15)	“broguing” means holes formed during the knitting process, as opposed to being formed via removal of material (e.g., punching, cutting, etc.) The remainder of the terms can be	**’511 patent** • Claims 1, 2 • Figures 1-5 • 4:30-60 **’163 patent** • Claims 14, 15 • Figure 1-5 • 4:32-62	

	understood with their plain and ordinary meaning		
pointelle stitch knit (’511 Patent claims 6, 16, 18, 21; ’163 Patent claims 4, 16, 21; ’262 Patent claims 1, 7)	A stitch knit characterized by knitted openings forming a breathable structure	**’511 patent** • Claims 6, 16, 18, 21 • Figures 1-5 • 5:27-60, 6:18-44 **’163 patent** • Claims 4, 16, 21 • Figure 1-5 • 5:29-62, 6:20-46 **’262 patent** • Claims 1, 7 • Figure 1-5 • 5:43-6:9, 6:34-60	

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above document was served on December 5, 2025 to all counsel of record via electronic mail.

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