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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

COLE HAAN LLC, Plaintiff, v. TOP GLORY TRADING GROUP INC. AND DP DREAM PAIRS INC., Defendants.	**CIVIL ACTION NO. 2:25-cv-00176-ES-SDA** **DEFENDANTS' PRELIMINARY CLAIM CONSTRUCTIONS**

DEFENDANTS' PRELIMINARY CLAIM CONSTRUCTIONS

Pursuant to Local Patent Rule 4.2 and the Court's Scheduling Order (D.I. 49), Defendants Top Glory Trading Group Inc. and DP Dream Pairs Inc. (collectively, "Top Glory") hereby provide the following preliminary claim constructions and identifications of intrinsic and extrinsic evidence. Top Glory reserves the right to supplement its preliminary claim constructions and identifications of evidence.

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Top Glory Trading Group Inc. and DP Dream Pairs, Inc. v. Cole Haan LLC, IPR2025-01393

Pursuant to Local Patent Rule 4.1(b), the parties met and conferred with counsel for Plaintiff on December 3, 2025. Pursuant to Local Patent Rule 4.2(d), Top Glory is prepared to meet and confer with Plaintiff for the purposes of limiting the terms in dispute by narrowing or resolving differences, and facilitating the ultimate preparation of a Joint Claim Construction and Prehearing Statement.

Top Glory's preliminary claim constructions and identifications of evidence are based upon currently available information. Top Glory reserves the right to modify this disclosure should additional information become available during the course of the litigation. Top Glory further reserves the right to assert that the terms below, among other terms, are indefinite, and reserves the right to seek construction of the claims as a whole.

The terms, clauses, and claim elements are generally identified at least in the claims where each term, clause, or claim element first occurs. Top Glory contends that other occurrences of the term, clause, or claim element, or a variant thereof, should also be construed, regardless of whether the other occurrences are expressly identified with respect to other claims.

Further, several of the identified phrases or clauses for construction can be divided or subdivided in various ways. Top Glory reserves the right to propose that parts or subparts of the identified phrases and clauses be construed by the Court.

In the event that the Court wishes for the parties to provide a tutorial or other background information on the general area of technology related to the patents asserted in this matter, Top Glory reserves the right to identify additional evidence for use in the presentation of the tutorial and background information. This includes intrinsic evidence and extrinsic evidence, including expert testimony.

Pursuant to Local Patent Rule 4.2(b), Top Glory is producing documents currently in its possession, custody, or control required to accompany these Preliminary Claim Constructions.

Subject to the above limitations and reservations of rights, Top Glory submits that the following terms, clauses, and claim elements should be construed by the Court.

I. PRELIMINARY CLAIM CONSTRUCTIONS

Claim Term	Claims	Proposed Construction
wingtip pattern	’511 Patent, cls. 1, 15 ’163 Patent, cls. 1, 13, 14, 18	No patentable weight. <u>Alternatively</u>: a “W” shaped pattern
wing-shaped curved line	’511 Patent, cls. 1, 15 ’163 Patent, cls. 1, 13, 14, 18	No patentable weight. <u>Alternatively</u>: a “W” shaped curved line
line of broguing / [medial/lateral] line of broguing	’511 Patent, cls. 1, 17, 20 ’163 Patent, cls. 14, 19, 20, 22, 23 ’262 Patent, cls. 1, 2, 7, 8	No patentable weight. <u>Alternatively</u>: line of knit holes / [medial/lateral] line of knit holes
[medial/lateral/central]	’511 Patent, cls. 1, 2	No patentable weight.

broguing portion	’163 Patent, cls. 14, 15	Alternatively: [medial/lateral/central] knit holes portion
pointelle stitch knit	’511 Patent, cls. 6, 16, 18, 21 ’163 Patent, cls. 4, 16, 21 ’262 Patent, cls. 1, 7	openwork (small hole) stitch knit Alternatively: Indefinite.

II. IDENTIFICATION OF INTRINSIC EVIDENCE

Subject to the above limitations and reservations of rights, Top Glory further identifies the following items of intrinsic evidence that support Top Glory’s preliminary proposed constructions above:

Claim Term	Claims	Intrinsic Evidence
wingtip pattern	’511 Patent, cls. 1, 15 ’163 Patent, cls. 1, 13, 14, 18	’511 Patent: Figs. 1–5, Abstract, 1:25–55, 4:19–29, 4:30–60, 4:61–5:26, cls. 1, 15 ’163 Patent: Figs. 1–5, Abstract, 1:27–57, 4:21–31, 4:32–62, 4:63–5:28, cls. 1, 13, 14, 18 ’511 Patent FH: 10/5/2018, Non-Final Office Action; 4/3/2019, Applicant Arguments/Remarks
wing-shaped curved line	’511 Patent, cls. 1, 15 ’163 Patent, cls. 1, 13, 14, 18	’511 Patent: Figs. 1–5, Abstract, 1:25–55, 4:19–29, 4:30–60, 4:61–5:26, cls. 1, 15

		’163 Patent: Figs. 1–5, Abstract, 1:27–57, 4:21–31, 4:32–62, 4:63–5:28, cls. 1, 13, 14, 18 ’511 Patent FH: 10/5/2018, Non-Final Office Action; 4/3/2019, Applicant Arguments/Remarks
line of broguing / [medial/lateral] line of broguing	’511 Patent, cls. 1, 17, 20 ’163 Patent, cls. 14, 19, 20, 22, 23 ’262 Patent, cls. 1, 2, 7, 8	’511 Patent: Figs. 2, 5, 1:56–2:23, 2:24–59, 4:30–60, 4:61–5:26, 5:61–6:17, 6:18–44, cls. 1, 17, 20 ’163 Patent: Figs. 2, 5, 1:58–2:25, 2:26–61, 4:32–62, 4:63–5:28, 5:63–6:19, 6:20–46, cls. 14, 19, 20, 22, 23 ’262 Patent: Figs. 2, 5, 1:63–2:33, 2:34–3:4, 4:46–5:9, 5:10–42, 6:10–33, 6:34–60, cls. 1, 2, 7, 8 ’511 Patent FH: 4/3/2019, Applicant Arguments/Remarks
[medial/lateral/central] broguing portion	’511 Patent, cls. 1, 2 ’163 Patent, cls. 14, 15	’511 Patent: Figs. 2, 5, 1:56–2:23, 2:24–59, 4:30–60, 4:61–5:26, 5:61–6:17, 6:18–44, cls. 1, 2 ’163 Patent: Figs. 2, 5, 1:58–2:25, 2:26–61, 4:32–62, 4:63–5:28,

		5:63–6:19, 6:20–46, cls. 14, 15 '262 Patent: Figs. 2, 5, 1:63–2:33, 2:34–3:4, 4:46–5:9, 5:10–42, 6:10–33, 6:34–60 '511 Patent FH: 4/3/2019, Applicant Arguments/Remarks
pointelle stitch knit	'511 Patent, cls. 6, 16, 18, 21 '163 Patent, cls. 4, 16, 21 '262 Patent, cls. 1, 7	'511 Patent: Figs. 3, 5, 2:60–3:22, 5:27–60, 6:18–44, cls. 6, 16, 18, 21 '163 Patent: Figs. 3, 5, 2:62–3:24, 5:29–62, 6:20–46, cls. 4, 16, 21 '262 Patent: Figs. 3, 5, 3:5–38, 5:43–6:9, 6:34–60, cls. 1, 7 '511 Patent FH: 4/3/2019, Applicant Arguments/Remarks

III. IDENTIFICATION OF EXTRINSIC EVIDENCE

Subject to the above limitations and reservations of rights, Top Glory further identifies the following items of extrinsic evidence that support Top Glory's preliminary proposed constructions above. The extrinsic evidence that Top Glory intends to rely upon has been produced at: TG176_0000001–0707, TG176_0000721–5907, COLEHAAN0000001-0963.

Claim Term	Claims	Extrinsic Evidence
wingtip pattern	’511 Patent, cls. 1, 15 ’163 Patent, cls. 1, 13, 14, 18	Testimony of Dr. Sabit Adanur regarding how one of ordinary skill in the art at the time of the claimed inventions of the Asserted Claims would have understood the identified claim language; and background and context regarding the subject matter at issue, including, but not limited to, the level of ordinary skill in the art, in an effort to assist the Court in understanding the subject matter in dispute from the perspective of one of ordinary skill at the relevant time. U.S. Patent App. Pub. No. 2010/0154256 (“Dua ’256”) U.S. Patent No. 2,312,078 (“Crannell”) U.S. Patent No. 7,949,570 (“Litke”) U.S. Patent No. D905,386 U.S. Patent No. D816,308 *The Different Types of Men’s Dress Shoes (B)*, ATTIRE CLUB (May 29, 2013),

		https://attireclub.org/2013/05/29/the-different-types-of-mens-shoes *Footwear Guide: The Brogue*, CHARLES CLINKARD (Apr. 29, 2014), https://www.charlesclinkard.co.uk/blog/2014/04/footwear-guide-the-brogue Sonya Glyn Nicholson, *Selecting the Right Wingtip Design for Your Foot*, PARISIAN GENTLEMAN (Sept. 8, 2013), https://www.parisiangentleman.com/blog/spread-your-wingtips-selecting-the-right-wingtip-design-for-your-foot Alexandra Henton, *Best Brogues. Which to Wear and Where to Buy.*, THE FIELD (Dec. 22, 2014), https://www.thefield.co.uk/country-house/kit-reviews/best-brogues-21782 *Icons: The Brogue – From Marshwork to Gentlemans Footwear*, WELL DRESSED DAD (Apr. 15, 2013), https://welldresseddad.com/2013/04/15/brogue-

		from-marshwork-to-gentlemans-footwear Alan Flusser, *Clothes and the Man* (1985) Alan Flusser, *Dressing the Man* (2002) New Oxford American Dictionary (3rd ed. 2010) The American Heritage Dictionary of the English Language (5th ed. 2011) Webster's Third New International Dictionary (2002) Documents produced by the parties, including, for example without limitation: COLEHAAN0000690 COLEHAAN0000721 COLEHAAN0000722 COLEHAAN0000723 COLEHAAN0000724 COLEHAAN0000725 COLEHAAN0000726 COLEHAAN0000727 COLEHAAN0000728 COLEHAAN0000729 COLEHAAN0000730 COLEHAAN0000740 COLEHAAN0000741 COLEHAAN0000742 TG176_0000675–0678

		TG176_0000679–0682 TG176_0000704–0707
wing-shaped curved line	’511 Patent, cls. 1, 15 ’163 Patent, cls. 1, 13, 14, 18	Testimony of Dr. Sabit Adanur regarding how one of ordinary skill in the art at the time of the claimed inventions of the Asserted Claims would have understood the identified claim language; and background and context regarding the subject matter at issue, including, but not limited to, the level of ordinary skill in the art, in an effort to assist the Court in understanding the subject matter in dispute from the perspective of one of ordinary skill at the relevant time. U.S. Patent App. Pub. No. 2010/0154256 (“Dua ’256”) U.S. Patent No. 2,312,078 (“Crannell”) U.S. Patent No. 7,949,570 (“Litke”) U.S. Patent No. D905,386 U.S. Patent No. D816,308 *The Different Types of Men’s Dress Shoes (B)*, ATTIRE CLUB (May 29,

		2013), https://attireclub.org/2013/05/29/the-different-types-of-mens-shoes *Footwear Guide: The Brogue*, CHARLES CLINKARD (Apr. 29, 2014), https://www.charlesclinkard.co.uk/blog/2014/04/footwear-guide-the-brogue Sonya Glyn Nicholson, *Selecting the Right Wingtip Design for Your Foot*, PARISIAN GENTLEMAN (Sept. 8, 2013), https://www.parisiangentleman.com/blog/spread-your-wingtips-selecting-the-right-wingtip-design-for-your-foot Alexandra Henton, *Best Brogues. Which to Wear and Where to Buy.*, THE FIELD (Dec. 22, 2014), https://www.thefield.co.uk/country-house/kit-reviews/best-brogues-21782 *Icons: The Brogue – From Marshwork to Gentlemans Footwear*, WELL DRESSED DAD (Apr. 15, 2013), https://welldresseddad.co

		m/2013/04/15/brogue-from-marshwork-to-gentlemans-footwear Alan Flusser, *Clothes and the Man* (1985) Alan Flusser, *Dressing the Man* (2002) New Oxford American Dictionary (3rd ed. 2010) The American Heritage Dictionary of the English Language (5th ed. 2011) Webster's Third New International Dictionary (2002) Documents produced by the parties, including, for example without limitation: COLEHAAN0000690 COLEHAAN0000721 COLEHAAN0000722 COLEHAAN0000723 COLEHAAN0000724 COLEHAAN0000725 COLEHAAN0000726 COLEHAAN0000727 COLEHAAN0000728 COLEHAAN0000729 COLEHAAN0000730 COLEHAAN0000740 COLEHAAN0000741 COLEHAAN0000742
line of broguing /	'511 Patent, cls. 1, 17, 20	Testimony of Dr. Sabit

[medial/lateral] line of broguing	’163 Patent, cls. 14, 19, 20, 22, 23 ’262 Patent, cls. 1, 2, 7, 8	Adanur regarding how one of ordinary skill in the art at the time of the claimed inventions of the Asserted Claims would have understood the identified claim language; and background and context regarding the subject matter at issue, including, but not limited to, the level of ordinary skill in the art, in an effort to assist the Court in understanding the subject matter in dispute from the perspective of one of ordinary skill at the relevant time. Webster’s Third New International Dictionary (2002) New Oxford American Dictionary (3rd ed. 2010) The American Heritage Dictionary of the English Language (5th ed. 2011) U.S. Patent No. 7,949,570 (“Litke”) Alan Flusser, *Clothes and the Man* (1985) Alan Flusser, *Dressing the Man* (2002)

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[medial/lateral/central] broguing portion	’511 Patent, cls. 1, 2 ’163 Patent, cls. 14, 15	Testimony of Dr. Sabit Adanur regarding how one of ordinary skill in the art at the time of the claimed inventions of the Asserted Claims would have understood the identified claim language; and background and context regarding the subject matter at issue, including, but not limited to, the level of ordinary skill in the art, in an effort to assist the Court in understanding the subject matter in dispute from the perspective of one of ordinary skill at the relevant time. Webster’s Third New

		International Dictionary (2002) New Oxford American Dictionary (3rd ed. 2010) The American Heritage Dictionary of the English Language (5th ed. 2011) U.S. Patent No. 7,949,570 ("Litke") Alan Flusser, *Clothes and the Man* (1985) Alan Flusser, *Dressing the Man* (2002) Documents produced by the parties, including, for example without limitation: COLEHAAN0000690 COLEHAAN0000721 COLEHAAN0000722 COLEHAAN0000723 COLEHAAN0000724 COLEHAAN0000725 COLEHAAN0000726 COLEHAAN0000727 COLEHAAN0000728 COLEHAAN0000729 COLEHAAN0000730 COLEHAAN0000740 COLEHAAN0000741 COLEHAAN0000742
pointelle stitch knit	'511 Patent, cls. 6, 16, 18, 21	Testimony of Dr. Sabit Adanur regarding how one of ordinary skill in

	’163 Patent, cls. 4, 16, 21 ’262 Patent, cls. 1, 7	the art at the time of the claimed inventions of the Asserted Claims would have understood the identified claim language; and background and context regarding the subject matter at issue, including, but not limited to, the level of ordinary skill in the art, in an effort to assist the Court in understanding the subject matter in dispute from the perspective of one of ordinary skill at the relevant time. David J. Spencer, *Knitting Technology: A Comprehensive Handbook and Practical Guide* (3rd ed. 2001) H. Stoll GmbH & Co, *Stoll Training: Manual Flat Knitting Machine*, 71-73 (2013) A. W. Koester, *Fashion Terms: Apparel Fabric Glossary*, 6 (1992) *Merriam-Webster’s Collegiate Dictionary* (10th ed. 2001) *The Oxford American College Dictionary* (2002)

		U.S. Patent App. Pub. No. 2015/0237960 ("Mallen") U.S. Patent App. Pub. No. 2005/0115282 ("Starbuck") David J. Spencer, *Knitting Technology: A Comprehensive Handbook and Practical Guide* (3rd ed. 2001) Documents produced by the parties, including, for example without limitation: COLEHAAN0000721 COLEHAAN0000722 COLEHAAN0000723 COLEHAAN0000724 COLEHAAN0000725 COLEHAAN0000726 COLEHAAN0000727 COLEHAAN0000728 COLEHAAN0000729 COLEHAAN0000730 COLEHAAN0000731 COLEHAAN0000740 COLEHAAN0000741 COLEHAAN0000742

Dated: December 5, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above document was served to all counsel of record by email on December 5, 2025.

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