Exhibit T

CHAMPION'S INFRINGEMENT CONTENTIONS FOR
U.S. PATENT NO. 11,761,390
AS ASSERTED AGAINST
HARBOR FREIGHT MODEL 70476
FILING DATE: FEBRUARY 16, 2022
PRIORITY DATE: NOVEMBER 1, 2013

I. Harbor Freight Model 70476

II. Brief Description

Harbor Freight Model 70476 is a tri-fuel portable generator under Harbor Freight's Predator brand. It uses a 458cc engine producing 13,000W (starting)/10,000W (running) when using gasoline, 12,000W (starting)/ 9,100W (running) when using liquefied petroleum gas ("LPG"; also known as propane), and 10,000W (starting)/ 7,800W (running) when using natural gas ("NG"). It can operate at 50% load for up to 12.1 hours with its 10.7-gallon gasoline tank or up to 16 hours with a 100-pound LPG tank. Model 70476 includes carbon monoxide ("CO") and low oil shutoffs. It includes a battery-operated, push-button electric start and a recoil starter. A remote starting option lets a user start up and shut down the generator from up to 100 feet away using the included key fob. Model 70476 also includes seven receptacles, circuit breaker protection, and a control panel with a digital display. Model 70476 also has a fold-down locking handle.

III. Asserted Claims and Priority Date

Model 70476is alleged to infringe claims 1-3, and 5-10 (the "Asserted Claims") of U.S. Patent No. 11,761,390 (the "'390 Patent").

The priority date for the Asserted Claims of the '390 Patent is November 1, 2013.

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IV. Statement Regarding Contributory and Induced Infringement

The claimed generator operates on different fuels, like a liquid fuel (e.g., gasoline) or a gaseous fuel (e.g., LPG), but a gaseous fuel tank (e.g., an LPG tank), the gaseous fuel in the gaseous fuel tank, and liquid fuel in the liquid fuel tank (e.g., gasoline in a gasoline tank) are not required for infringement unless explicitly claimed in the Asserted Claims. Nonetheless, to the extent the Court construes any claim to require a gaseous fuel tank, gaseous fuel in the gaseous fuel tank, or liquid fuel in a liquid fuel tank, Harbor Freight contributes to or induces infringement by instructing its users to use a gaseous fuel tank and gaseous fuel and to fill the liquid fuel tank in order to operate the dual fuel engine.

Harbor Freight induces infringement of various Asserted Claims by specifically instructing its customers to attach an LPG tank to the engine and to put liquid fuel in the liquid fuel tank. [*See* Harbor Freight Owner's Manual for Model 70476 at page 18 (listing gasoline quality requirements with instructions to "4. If needed, fill the Fuel Tank to about 1 inch under the fill neck of the Fuel Tank with 87 octane") and at page 19 (providing instructions "[f]or LPG Operation . . . e. Connect LPG/Propane tank using provided attachment kit only. Kit includes 1.5 meter (4.9 ft) Hose.").] To the extent the Court construes any Asserted Claim to require an LPG tank, gaseous fuel, or liquid fuel for infringement, when Harbor Freight's customers use the Accused Instrumentalities with a filled LPG tank connected and with fuel in the liquid fuel tank, the infringement of any such Asserted Claims is completed. As such, Harbor Freight's instructions to customers to connect a filled LPG tank and fill the liquid fuel tank before operation of the Accused Instrumentalities constitutes indirect infringement.

For the same reasons, Harbor Freight's conduct also constitutes contributory infringement. To the extent the Court's claim construction requires an LPG tank, gaseous fuel, or liquid fuel for infringement, Harbor Freight supplies its customers every component necessary to infringe the Asserted Claims except the filled LPG tank and the liquid fuel. Because the Owner's Manual for Model 70476 instructs customers to connect a filled LPG tank to the generator and to fill the liquid fuel tank with fuel, [*id.*], Harbor Freight knew that Model 70476 would be used to infringe any applicable Asserted Claims. By connecting and using the Accused Instrumentalities with a filled LPG tank connected or with liquid fuel in the liquid fuel tank, Harbor Freight's customers complete the infringement of such Asserted Claims. As such, Harbor Freight's conduct also constitutes contributory infringement of such Asserted Claims.

Champion incorporates this Section IV by reference into any element of any asserted claim that is construed to require attachment of a gaseous fuel tank, gaseous fuel, or filling of the liquid fuel tank with fuel.

V. Claim Chart

'390 Patent Asserted Claims	Accused Instrumentality Components Illustrated with Respect to Model 70476
1. (Preamble) A fuel selector of a	Although not necessary for infringement[1], the preamble of claim 1 is found within Model 70476 as follows:

[1] The preambles of the Asserted Claims of the '390 Patent are not limiting and therefore should not be part of the infringement analysis. *See Artic Cat Inc. v. GEP Power Prods., Inc.*, 919 F.3d 1320, 1328 (Fed. Cir. 2019) ("We have long ruled that 'a preamble is not limiting where a patentee defines a structurally complete invention in the claim body and uses the preamble only to state a purpose or intended use for the invention.") (quoting *Cataline Mktg. Int'l, Inc. v. Coolsavings.com, Inc.*, 289 F.3d 801, 808 (Fed. Cir. 2002)). Nonetheless, Champion provides

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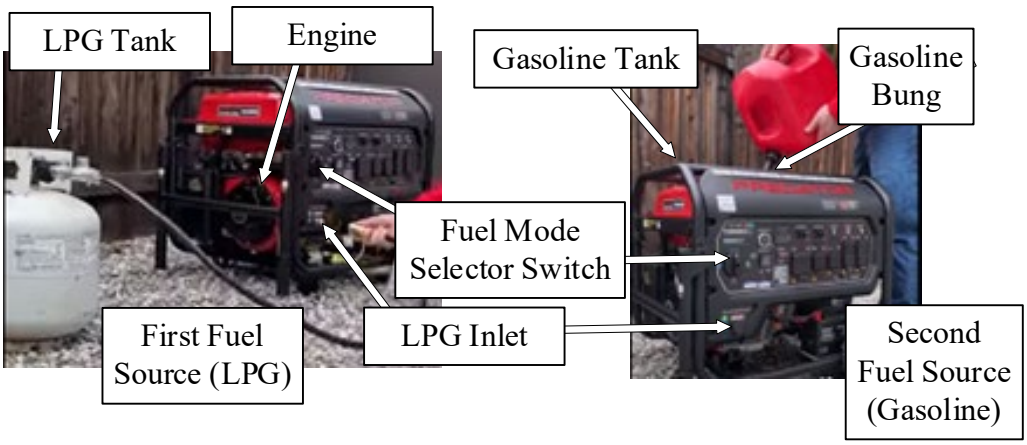
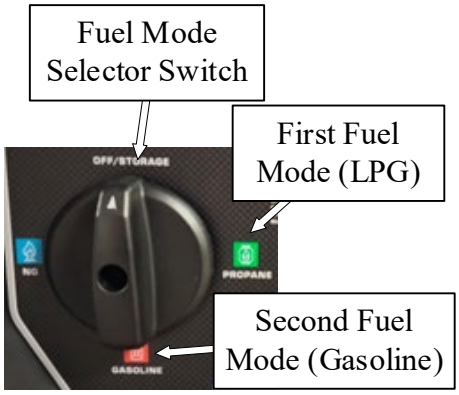
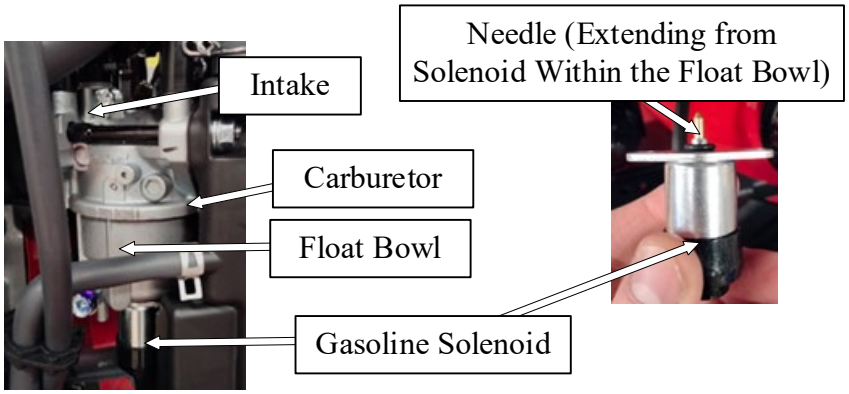
dual fuel generator comprising:	Since Model 70476 is a tri fuel generator that is operable on three fuels, Model 70476 is also a dual fuel generator that is operable on two fuels. Model 70476 includes a multi-fuel engine that can run on either gaseous LPG or liquid gasoline. The first fuel source is a pressurized LPG tank, and the second fuel source is a gasoline tank. Both fuel sources feed fuel to the engine and associated carburetor. A fuel mode selector switch operates which one is open and closed, only allowing one to open at a time. 
(a) a selector switch having:	Element (a) of claim 1 is found within Model 70476 directly and literally[2] as follows: 

general description of Model 70476 next to the preamble to show how it meets the preamble and to assist in the infringement analysis by giving an overview of the Accused Instrumentalities. Champion incorporates this footnote by reference in the preambles of all the Asserted Claims.

[2] To the extent further discovery or claim construction reveals that any of the Accused Instrumentalities do not literally infringe the '390 Patent, Champion reserves the right to argue the Accused Instrumentalities infringe any of the Asserted Claims of the '390 Patent under the doctrine of equivalents. Champion incorporates this footnote by reference into each element of each Asserted Claim that Champion alleges is literally infringed by the Accused Instrumentalities.

	The selector switch has multiple modes including an LPG Mode as the first fuel mode and a Gasoline Mode as the second fuel mode.
(a)(1) a first fuel mode configured to enable a first fuel flow from a first fuel source to an engine of the dual fuel generator; and	Element (a)(1) of claim 1 is found within Model 70476 directly and literally[3] as follows: LPG Mode enables a first LPG fuel flow from the pressurized LPG tank to the engine.
(a)(2) a second fuel mode configured to enable a second fuel flow from a second fuel source to the engine of the dual fuel generator;	Element (a)(2) of claim 1 is found within Model 70476 directly and literally as follows: Gasoline Mode enables a second gasoline fuel flow from the gasoline tank.
(b) a fuel solenoid having open and closed positions; and	Element (b) of claim 1 is found within Model 70476 directly and literally as follows: 

[3] To the extent further discovery or claim construction reveals that any of the Accused Instrumentalities do not literally infringe the '390 Patent, Champion reserves the right to argue the Accused Instrumentalities infringe any of the Asserted Claims of the '390 Patent under the doctrine of equivalents. Champion incorporates this footnote by reference into each element of each Asserted Claim that Champion alleges is literally infringed by the Accused Instrumentalities.

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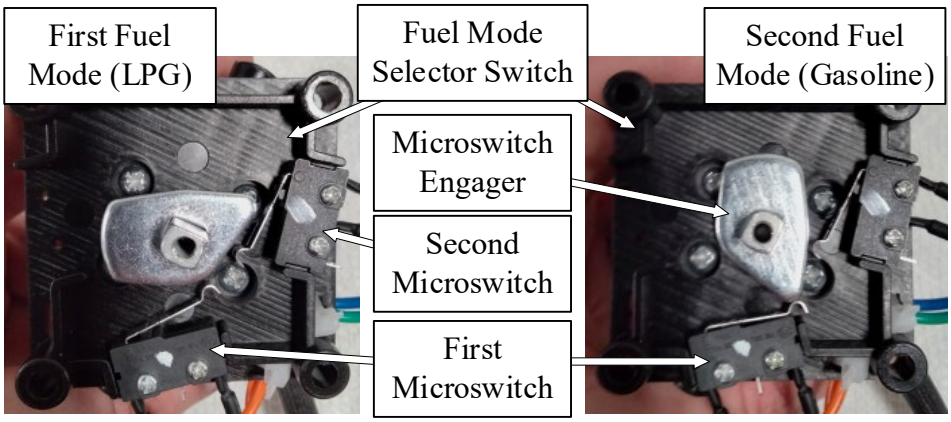
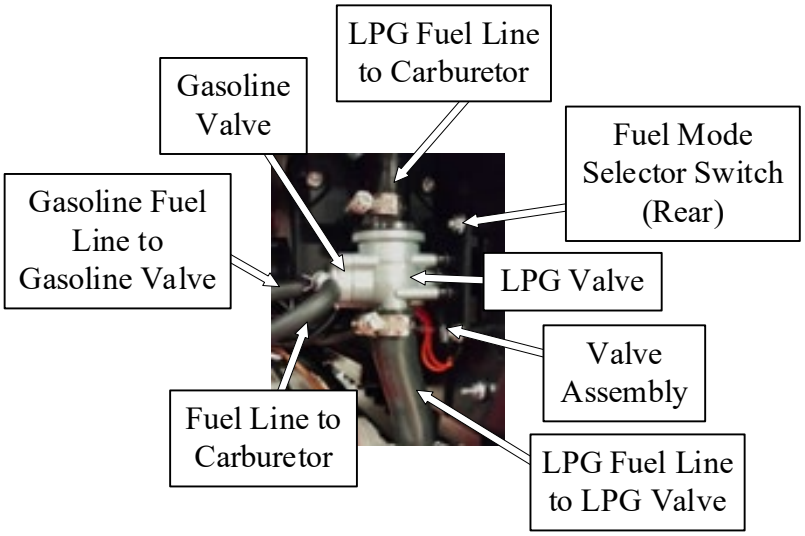
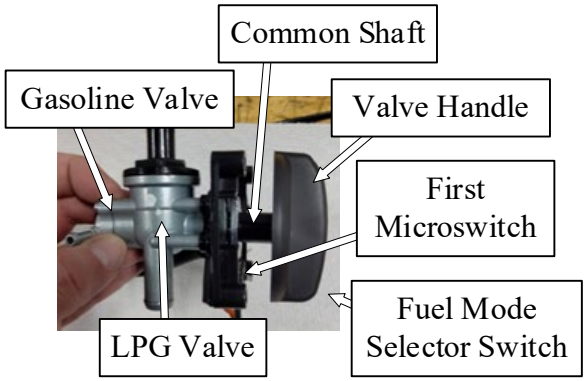
	A gasoline solenoid is attached to the carburetor on the float bowl. It has a needle that is extended when the solenoid is closed and retracted when open. When extended, the needle blocks the flow of gasoline to the engine.
(c) a solenoid switch having a closed position to activate the fuel solenoid and an open position;	Element (c) of claim 1 is found within Model 70476 directly and literally as follows:  First and second microswitches are included on the selector switch. When the selector switch is in Gasoline Mode, a microswitch engager on the selector switch engages only the first microswitch, and the gasoline solenoid opens to allow gasoline to flow. When the selector switch is in LPG Mode, the microswitch engager does not engage either of the first and second microswitches, and the gasoline solenoid receives power from the alternator to close and cut off the flow of liquid gasoline to the engine. Thus, the engagement of the first microswitch selectively couples power from the alternator to the gasoline solenoid to open and close the liquid fuel path through the carburetor.
(d) wherein, when the selector switch is in the first fuel mode, the fuel solenoid is in the closed position and, when the selector switch is in the second fuel mode, the solenoid switch is in the open position and the fuel solenoid is	Element (d) of claim 1 is found within Model 70476 directly and literally as follows: When the selector switch is in LPG mode, the gasoline solenoid is closed. When the selector switch is in Gasoline Mode, the first microswitch and the gasoline solenoid are open.

in the open position.	
2. The fuel selector of claim 1 wherein the selector switch triggers the solenoid switch when changed from the second fuel mode to the first fuel mode, so as to cause the fuel solenoid to operate in the closed position.	Claim 2 is found within Model 70476 directly and literally as follows: Champion incorporates by reference in claim 2 the contentions set forth above for claim 1. When the selector switch moves from Gasoline Mode to LPG Mode, the microswitch engager triggers the first microswitch to cause the first microswitch and the gasoline solenoid to close.
3. (Preamble) The fuel selector of claim 1 further comprising:	Claim 3 is found within Model 70476 directly and literally as follows: Champion incorporates by reference in claim 3 the contentions set forth above for claim 1.
(a) a valve assembly fluidly connectable to each of the first fuel source and the second fuel source, the valve assembly being operable to selectively control the first fuel flow and the second fuel flow from the first fuel source and the second fuel source, respectively, to the engine of the	Element (a) of claim 3 is found within Model 70476 directly and literally as follows: The valve assembly is mounted to the rear of the selector switch and includes a mechanical LPG valve and a mechanical gasoline valve. The first flow of fuel is LPG from the LPG tank. The second fuel flow is gasoline from the gasoline tank. The LPG and gasoline tanks feed fuel to the valve assembly which is then delivered to the carburetor and engine. The selector switch includes a common shaft that rotates each valve as the selector switch is rotated.

dual fuel generator; and	 
(b) wherein positioning of the selector switch in the first fuel mode and the second fuel mode enables a selection of one of the first fuel flow and the second fuel flow.	Element (b) of claim 3 is found within Model 70476 directly and literally as follows: When the selector switch is in LPG Mode, the LPG valve is open, and the gasoline valve is closed to select the first LPG fuel flow. When the selector switch is in Gasoline Mode, the gasoline valve is open, and the LPG valve is closed to select the gasoline fuel flow.
4. The fuel selector of claim 3 wherein the valve assembly is positioned on	Claim 4 is found within Model 70476 directly and literally as follows: Champion incorporates by reference in claim 4 the contentions set forth above for claims 3 and 1.

or adjacent the selector switch.	The LPG valve and gasoline valve of the valve assembly are positioned on or adjacent the selector switch.
5. (Preamble) The fuel selector of claim 3 wherein the valve assembly comprises:	Claim 5 is found within Model 70476 directly and literally as follows: Champion incorporates by reference in claim 5 the contentions set forth above for claims 3 and 1. The valve assembly is further described below.
(a) two fuel inputs, with a first fuel input connectable to the first fuel source and a second fuel input connectable to the second fuel source; and	Element (a) of claim 5 is found within Model 70476 directly and literally as follows: The valve assembly has an LPG fuel input to the LPG valve from the LPG tank via an LPG fuel line. The valve assembly also has a gasoline fuel input to the gasoline valve from the gasoline tank via a gasoline fuel line.
(b) two fuel outputs for selectively supplying fuel to the engine from the first fuel source or the second fuel source.	Element (b) of claim 5 is found within Model 70476 directly and literally as follows: The valve assembly has an LPG fuel output to the carburetor via an LPG fuel line. The valve assembly also has a gasoline fuel output to the carburetor via a gasoline fuel line. Only one of LPG and gasoline is provided to the carburetor at a time.
6. The fuel selector of claim 5 wherein the two fuel outputs selectively supply fuel to the engine from only the first fuel source or only the second fuel source, responsive to	Claim 6 is found within Model 70476 directly and literally as follows: Champion incorporates by reference in claim 6 the contentions set forth above for claims 5, 3, and 1. The gasoline fuel output will only supply gasoline fuel from the gasoline tank when the selector switch is in Gasoline Mode. Likewise, the LPG fuel output will only output LPG fuel when the selector switch is in LPG Mode.

selection of the first fuel flow or the second fuel flow via the selector switch and to a corresponding operation of the valve assembly.	
7. (Preamble) The fuel selector of claim 5 wherein the valve assembly comprises:	Claim 7 is found within Model 70476 directly and literally as follows: Champion incorporates by reference in claim 7 the contentions set forth above for claims 5, 3, and 1. The valve assembly is further described below.
(a) a first fuel valve having open and closed positions to selectively control the first fuel flow to the engine; and	Element (a) of claim 7 is found within Model 70476 directly and literally as follows: The first fuel valve is the mechanical LPG valve. It is open when the selector switch is in LPG Mode and closed when the selector switch is in Gasoline Mode.
(b) a second fuel valve having open and closed positions to selectively control the second fuel flow to the engine.	Element (b) of claim 7 is found within Model 70476 directly and literally as follows: The second fuel valve is the mechanical gasoline valve. It is open when the selector switch is in Gasoline Mode and when the selector switch is in LPG Mode.
8. The fuel selector of claim 3 wherein the first fuel source is a liquefied petroleum gas (LPG) fuel source and	Claim 8 is found within Model 70476 directly and literally as follows: Champion incorporates by reference in claim 8 the contentions set forth above for claims 3, and 1. The first fuel source is the pressurized LPG tank, and the second fuel source is the gasoline tank.

wherein the second fuel source is a gasoline fuel source.	
9. The fuel selector of claim 1 wherein the fuel solenoid is a carburetor shutoff solenoid.	Claim 9 is found within Model 70476 directly and literally as follows: Champion incorporates by reference in claim 9 the contentions set forth above for claim 1. The gasoline solenoid is a carburetor shutoff solenoid.
10. The fuel selector of claim 1 wherein, when the selector switch is in the first fuel mode, the solenoid switch is in the closed position.	Claim 10 is found within Model 70476 directly and literally as follows: Champion incorporates by reference in claim 10 the contentions set forth above for claim 1. When the selector switch is in LPG Mode, the first microswitch is closed.

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