

Attachment A-34

Invalidity Claim Chart for U.S. Patent No. 12,015,375

Reference: Japanese Patent Application Publication JPH10135499A (“Machida”)

Prior Art Status: Machida was filed on Oct. 31, 1996 and published on May 22, 1998. The '375 Patent was filed on June 26, 2023, and claims priority to provisional patent application No. 62/047,773 filed on September 9, 2014. Based upon Applicant's disclosure in U.S. provisional patent application No. 62/047,773, one of ordinary skill would not have understood the named inventor of U.S. Patent No. 12,015,375 (the "'375 Patent") to be in possession of the purported inventions of the '375 Patent as of September 9, 2014. Instead, the purported inventions of the '375 Patent are at best entitled to a priority date of September 9, 2015, when the specification of the '375 Patent was disclosed in U.S. Pat. Appl. No. 14/849,458, to the extent the specification of the '375 Patent provide a written description for, and enable, the asserted claims of the '375 Patent. Therefore, Machida is prior art under at least 35 U.S.C. §§ 102(a)(1), (a)(2).

Element	U.S. Patent No. 12,015,375 Claim Limitation	Japanese Patent Application Publication JPH10135499A (“Machida”)
Claim 1		
1[pre]	A lead assembly for electrically coupling one or more drop lines to a feeder cable, the lead assembly comprising:	To the extent the preamble may be construed to be limiting, Machida discloses this limitation. For example:

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		Discovery is currently in its early stages and is ongoing. Voltage reserves the right to supplement and/or amend its responses as discovery proceeds.
Claim 23		
23	The lead assembly of claim 22, wherein at least a portion of the section of exposed wire of the drop line cable is parallel to at least a portion of the section of exposed wire of the feeder cable.	Machida discloses this limitation. For example: <i>See claim 1[h] above.</i>
Claim 24		
24	The lead assembly of claim 20, wherein the mold structure further comprises a monolithic mold structure.	Machida discloses this limitation. For example: <i>See claim 1[b] above.</i>