

Attachment A-20

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

Reference: Korean Patent No. KR101428689B1 (“Kim”)

Prior Art Status: Kim was filed on January 7, 2014, granted and published on August 11, 2014. 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, Kim 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	Korean Patent No. KR101428689B1 (“Kim”)
Claim 1		
1[pre]	A lead assembly for electrically coupling one or more drop lines to a feeder cable, the lead assembly comprising:	<p>To the extent the preamble may be construed to be limiting, Kim discloses this limitation. For example:</p> <p>[Abstract] The present invention relates to an apparatus and a method for connecting cables, and is characterized by including a plurality of cables having at least two thicknesses, a conductive portion for compressing and sealing the coated cable core portions, and a sealing portion for sealing the core region of the cable and a method of connecting the cable.</p> <p>[0006] A plurality of cables having at least two thicknesses according to the present invention, a conductive part for compressing and sealing the coated cable core parts, and a sealing part for sealing the core area of the cable.</p>

Element	U.S. Patent No. 12,015,375 Claim Limitation	Korean Patent No. KR101428689B1 (“Kim”)
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.	<p>Kim discloses this limitation. For example:</p> <p><i>See claim 1[h] above.</i></p> <p>Furthermore, this claim element is obvious in light of Kim by itself, in combination with any of the other references as charted for this claim element in Attachment A, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of one of ordinary skill, or from the known problems and predictable solutions as disclosed in these references. Discovery is currently in its early stages and is ongoing. Voltage reserves the right to supplement and/or amend its responses as discovery proceeds.</p>
Claim 24		
24	The lead assembly of claim 20, wherein the mold structure further comprises a monolithic mold structure.	<p>Kim discloses this limitation. For example:</p> <p><i>See claim 1[b] above.</i></p> <p>Furthermore, this claim element is obvious in light of Kim by itself, in combination with any of the other references as charted for this claim element in Attachment A, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of one of ordinary skill, or from the known problems and predictable solutions as disclosed in these references. Discovery is currently in its early stages and is ongoing. Voltage reserves the right to supplement and/or amend its responses as discovery proceeds.</p>