

CHAMPION'S INFRINGEMENT CONTENTIONS FOR
U.S. PATENT NO. 11,143,145
AS ASSERTED AGAINST
FIRMAN MODEL H05751 ET AL.
FILING DATE: JUNE 22, 2020
PRIORITY DATE: JUNE 12, 2015

I. Firman Model H05751:



II. Brief Description:

The Firman Model H05751 is a dual fuel portable generator. Model H05751 produces 7,125W (Starting)/5,700W (Running) when using gasoline or liquified petroleum gas (“LPG”; also known as propane). Model H05751 can operate up to 12 hours with an -8-gallon gasoline tank. Model H05751 has a battery-operated electric start and a recoil starter for its 439cc engine with a low oil shutoff and cast-iron cylinder sleeve. Model H05751 also includes an automatic voltage regulator (“AVR”), four receptacles, circuit breaker protection, and a control panel with a three-in-one data minder monitor. Model H05751 allows for connection to a manual transfer switch (“MTS”) and to a convenience cord. Model H05751 also has a muffler with a spark arrestor, a heavy-duty 1-1/4" steel tube frame, and 10" flat-free tires.

III. Accused Instrumentalities:

Together with Model H05751, the following Firman models (a)–(v) are the Accused Instrumentalities that are alleged to infringe claims 1, 2, and 4–7 (the “Asserted Claims”) of U.S. Patent No. 11,143,145 (the “145 Patent”).

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- a. Model H03651, a dual fuel portable generator;
- b. Model H03652, a dual fuel portable generator;
- c. Model H03654, a dual fuel portable generator;
- d. Model H05752, a dual fuel portable generator;
- e. Model H05753, a dual fuel portable generator;
- f. Model H05754, a dual fuel portable generator;
- g. Model H07552, a dual fuel portable generator;
- h. Model H07553, a dual fuel portable generator;
- i. Model H07554, a dual fuel portable generator;
- j. Model H08051, a dual fuel portable generator;
- k. Model H08052, a dual fuel portable generator;
- l. Model H08053, a dual fuel portable generator;
- m. Model T04073, a tri fuel portable generator;
- n. Model T07571, a tri fuel portable generator;
- o. Model T07571F, a tri fuel portable generator;
- p. Model T07573, a tri fuel portable generator;
- q. Model T08071, a tri fuel portable generator;
- r. Model T08072, a tri fuel portable generator;
- s. Model T09275, a tri fuel portable generator;
- t. Model T09371, a tri fuel portable generator;
- u. Model WH03562OF, a dual fuel open frame inverter portable generator;
and
- v. Model WH03662OF, a dual fuel open frame inverter portable generator.

IV. Images of Accused Instrumentalities (a)–(v):



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H07554 	H08051 	H08052 	H08053 
T04073 	T07571 	T07571F 	T07573 
T08071 	T08072 	T09275 	T09371 
WH03562OF 		WH03662OF 	

V. Protocol:

For purposes of analyzing the Asserted Claims” of the ’145 Patent against the above-identified Firman generator models, Model H05751 is considered representative. All of the above-referenced Firman generator models include components for switching between gaseous fuel and liquid fuel that infringe the claims of the ’145 Patent in the same manner as discussed herein with respect to Model H05751 and are thus all Accused Instrumentalities. The gaseous fuel in the Accused Instrumentalities is LPG in dual fuel generator models and either LPG or natural gas (“NG”) in tri fuel generator models. The liquid fuel is gasoline in all Accused Instrumentalities. In the majority of the generator models, these components are arranged in a substantially similar manner.

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Minor differences exist in Models WH03562OF and WH03662OF. In these models, the same components are included, but with a slightly different positioning of the components. More specifically, the fuel mode selector switch and the on-board LPG regulator are not positioned on the front panel like in the other generator models. Instead, the fuel mode selector switches are positioned on a side panel adjacent to the front panel, and the on-board LPG regulator is positioned on a rear side.

Accordingly, while the claim chart provided below in Section VIII is illustrated with reference to Model H05751 (all images in the claim chart in Section VIII are images of Model H05751 unless otherwise noted), each element in the claim chart is found in the other Accused Instrumentalities identified above in Paragraphs (a)–(v) of Section III in the same manner as illustrated with reference to Model H05751 (unless otherwise noted).

For the sake of completeness, additional images are provided of Model WH03662OF, which is also representative of Model WH03562OF, to show where the arrangement of Models WH03562OF and WH03662OF differ slightly from that of Model H05751.

This alternate configuration does not affect the applicability to any of the Asserted Claims.

VI. Priority Dates

The priority dates for the Asserted Claims of the '034 Patent are as follows:

Asserted Claim	Priority Date
1	10/28/2015
2	10/28/2015
4	10/28/2015
5	10/28/2015
6	10/28/2015
7	10/28/2015

VII. Statement Regarding Contributory and Induced Infringement

The claimed dual-fuel engine operates on different fuels, like a liquid fuel (e.g., gasoline) or a gaseous fuel (e.g., liquid petroleum gas or propane), 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, Firman contributes to or induces infringement by instructing its users to

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use a gaseous fuel tank, gaseous fuel, and to fill the liquid fuel tank in order to operate the multi-fuel engine.

Firman 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 Firman Owner’s Manual for Model Number H05751 at 15 (“ADD FUEL 1. Gasoline . . . Use regular UNLEADED gasoline with the generator engine with a minimum 87 octane”) (*emphasis in original*) and (“2 - Connecting Liquid Petroleum Gas (LPG/Propane) Cylinder), and at 23 (providing instructions for operating generator, including “connect[ing] the regulator to both LPG cylinder and generator”).] To the extent the Court construes any Asserted Claim to require an LPG tank, gaseous fuel, or liquid fuel for infringement, when Firman’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, Firman’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.

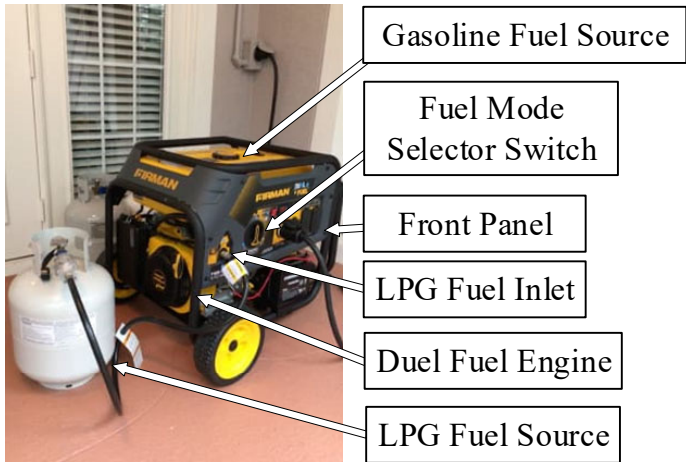
For the same reasons, Firman’s conduct also constitutes contributory infringement. To the extent the Court’s claim construction requires an LPG tank, gaseous fuel, or liquid fuel for infringement, Firman supplies its customers every component necessary to infringe the Asserted Claims except the filled LPG tank and the liquid fuel. Because the Owner’s Manual for the Model H05751 generator instructs customers to connect a filled LPG tank to the generator, [*see id.*], and to fill the liquid fuel tank with fuel, [*id.*], Firman knew that the Model H05751 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, Firman’s customers complete the infringement of such Asserted Claims. As such, Firman’s conduct also constitutes contributory infringement of such Asserted Claims.

Champion incorporates this Section VII 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.

VIII. Claim Chart:

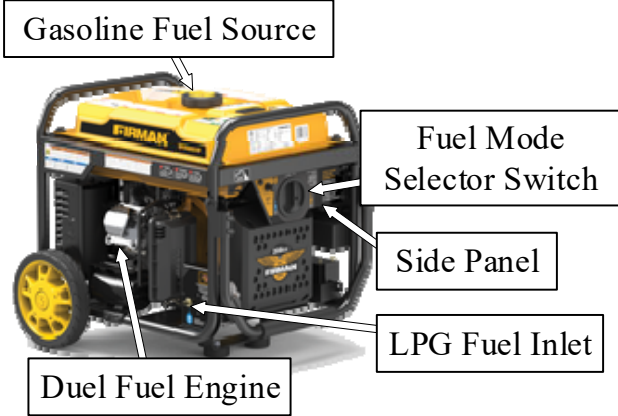
’145 Patent Claims	Accused Instrumentality Components Illustrated with Respect to Model H05751 (Except as Otherwise Noted)
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1. (Preamble) A dual fuel generator comprising:	Although not necessary for infringement¹, the preamble of claim 1 is found within Model H05751 (and, thereby, the remaining models outlined in (a)–(v) above) as follows:  Model H05751 is a dual fuel generator including a dual fuel engine that may run on fuel from either of two fuel sources. One fuel source is a liquid fuel source in the form of a gasoline tank, and the other fuel source is a gaseous fuel source in the form of a pressurized LPG tank.
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¹ The preambles of the Asserted Claims of the '145 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 general description of Model H05751 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.

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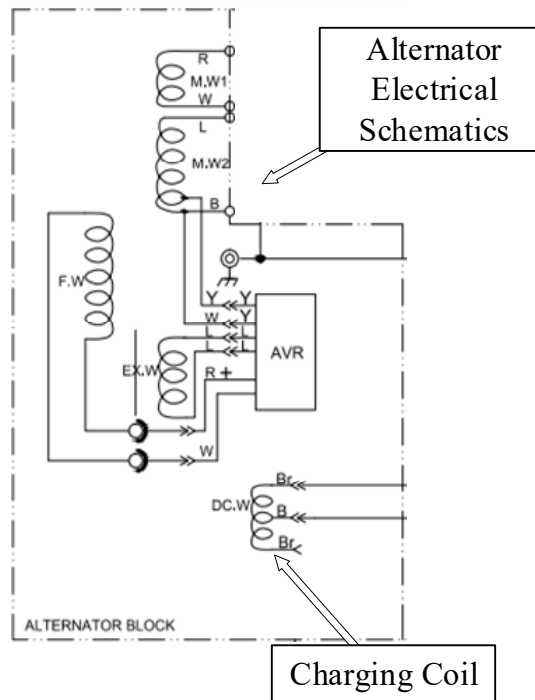
	Additional image for Model WH03662OF: 
(a) an engine operable on a gaseous fuel and a liquid fuel;	Element (a) of claim 1 is found within Model H05751 (and, thereby, the remaining models outlined in (a)–(v) above) directly and literally² as follows: As similarly explained above with respect to the preamble of claim 1, Model H05751 is a dual fuel generator including a dual fuel engine configured to operate on liquid gasoline from its gasoline tank or on LPG from a pressurized LPG tank.
(b) an electrical power generator driven by the engine and comprising a charging coil;	Element (b) of claim 1 is found within Model H05751 (and, thereby, the remaining models outlined in (a)–(v) above) directly and literally as follows: Model H05751 includes an alternator that is an electrical power generator driven by the engine. The alternator includes a charging coil.

² To the extent further discovery or claim construction reveals that any of the Accused Instrumentalities do not literally infringe the '145 Patent, Champion reserves the right to argue the Accused Instrumentalities infringe any of the Asserted Claims of the '145 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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Alternator



Alternator
Electrical
Schematics

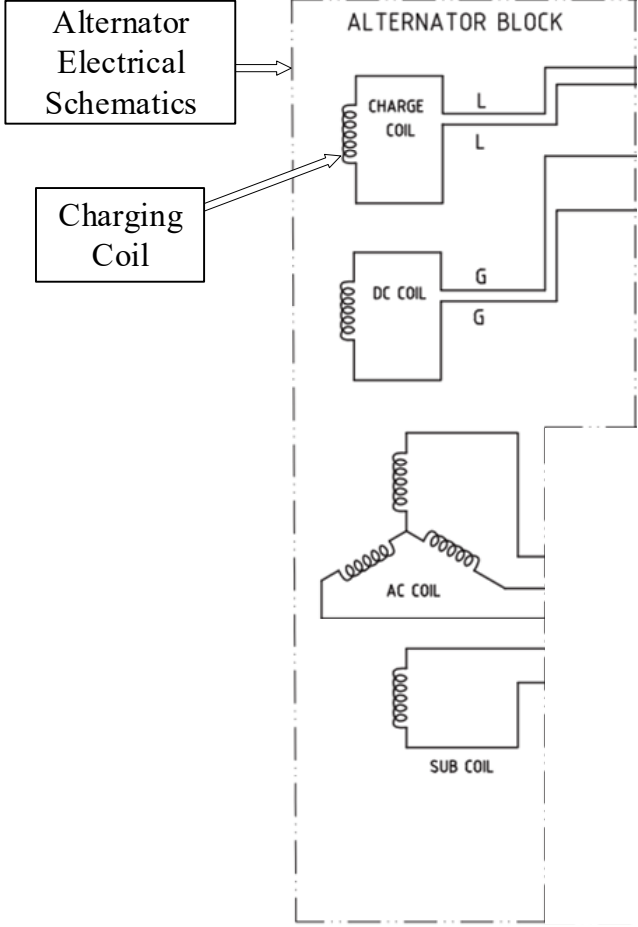
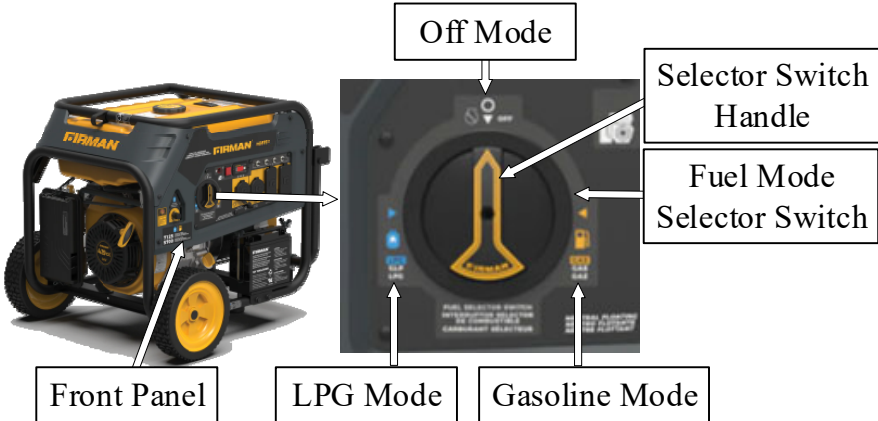
Charging Coil

Additional image for Model WH03662OF:



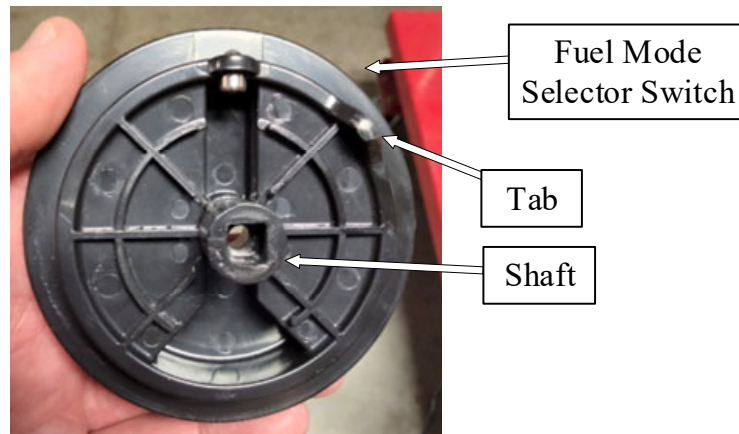
Alternator

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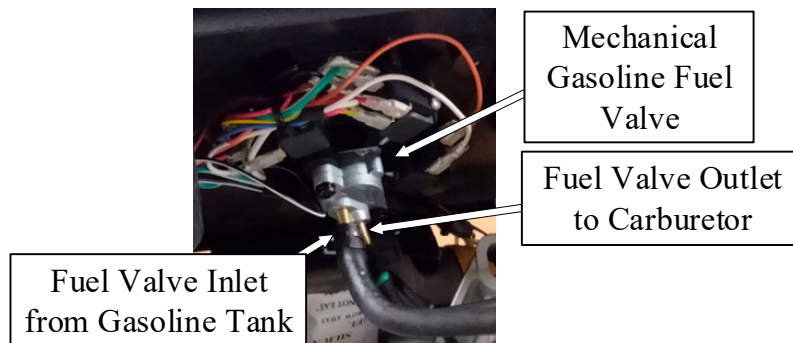
	 Alternator Electrical Schematics Charging Coil ALTERNATOR BLOCK CHARGE COIL DC COIL AC COIL SUB COIL
(c) a switch to change operation of the engine between gaseous fuel and liquid fuel;	Element (c) of claim 1 is found within Model H05751 (and, thereby, the remaining models outlined in (a)–(v) above) directly and literally as follows:  Front Panel LPG Mode Gasoline Mode Off Mode Selector Switch Handle Fuel Mode Selector Switch

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An electro-mechanical switch includes the Model H05751 fuel mode selector switch (“selector switch”) and three electrical switches engaged by a tab on the selector switch that collectively control a valve assembly. The selector switch is rotatable between an Off Mode, an LPG Mode, and a Gasoline Mode via a handle on the front of the selector switch.



The selector switch engages a mechanical gasoline fuel valve (the “gasoline valve”) of the valve assembly positioned behind the front panel of the generator via a shaft on the back of the selector switch. As the selector switch rotates, the selector switch actuates the gasoline valve. The gasoline valve is positioned between the gasoline tank and the engine.

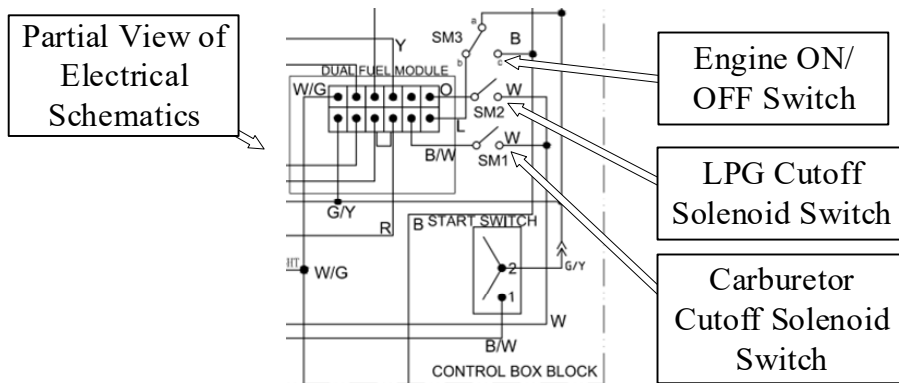
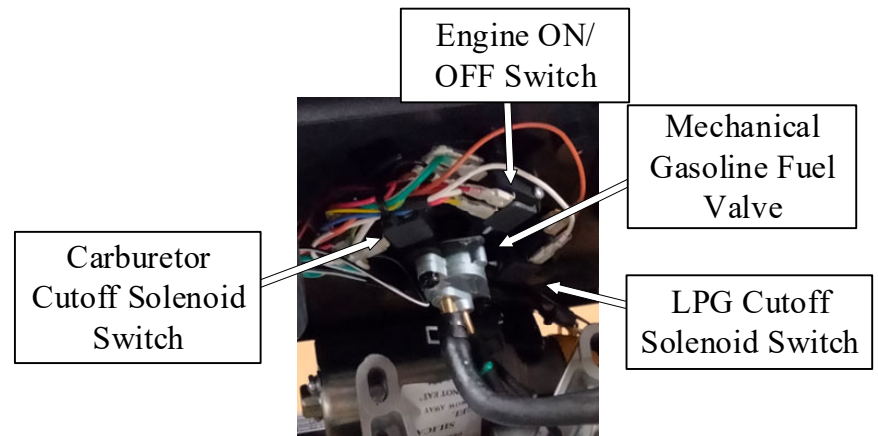


When the selector switch is in Off Mode, the gasoline valve is in a closed position in which the gasoline valve prevents gasoline from flowing to the engine. When the selector switch rotates to Gasoline

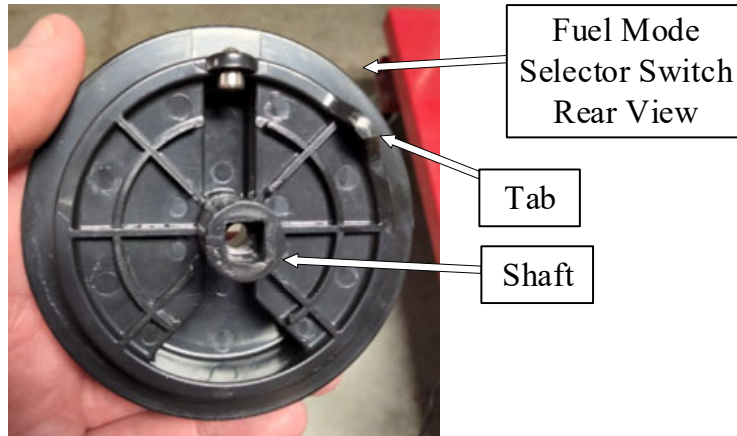
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Mode, the selector switch actuates the gasoline valve to an open position allowing gasoline to flow to the engine. When changing the operation of the engine from gasoline to LPG, the selector switch rotates from Gasoline Mode, to Off Mode, and then to LPG Mode. The selector switch actuates the gasoline valve to the closed position while rotating to Off Mode and maintains the gasoline valve in the closed position while rotating to LPG Mode to prevent gasoline from flowing to the engine at the same time LPG may flow to the engine.

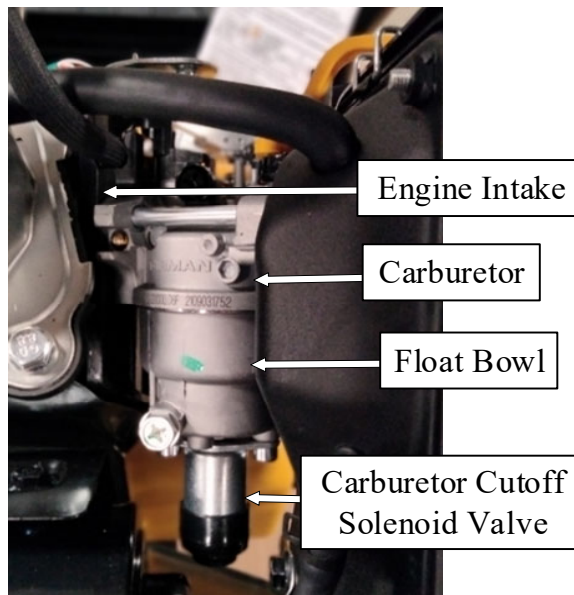
A tab on the selector switch engages the three electrical switches as the selector switch rotates. The three electrical switches include an engine ON/OFF switch (the "engine switch") behind the selector switch and engaged by the selector switch tab in Off Mode, a carburetor cutoff solenoid switch (the "carburetor solenoid switch") engaged by the selector switch tab when rotating into and out of Gasoline Mode, and an LPG cutoff solenoid switch (the "LPG solenoid switch") engaged by the selector switch tab in LPG Mode.



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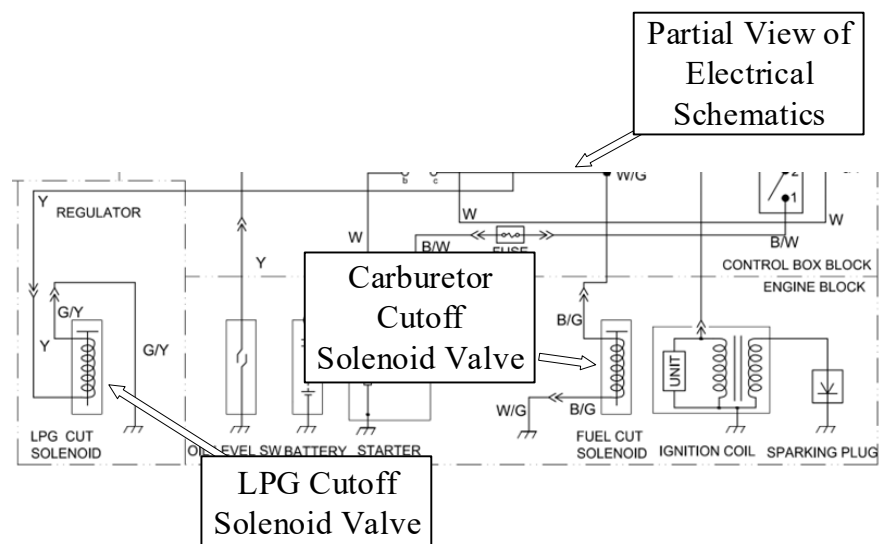
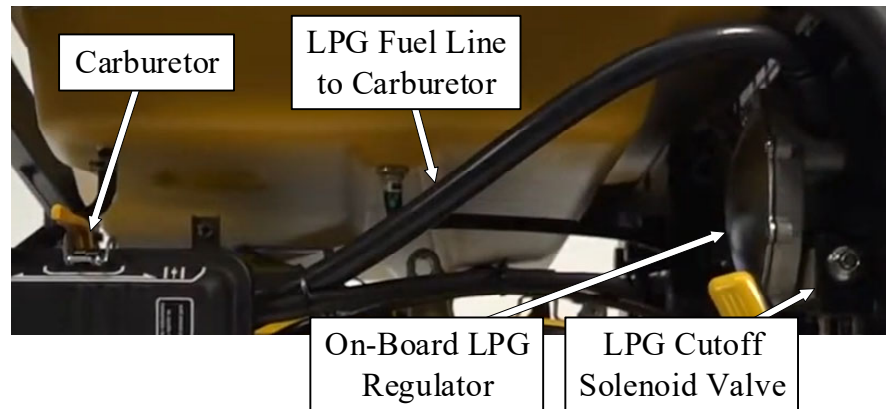


The carburetor solenoid switch controls a carburetor cutoff solenoid valve (the “carburetor solenoid”) of the valve assembly, and the LPG solenoid switch controls an LPG cutoff solenoid valve (the “LPG solenoid”) of the valve assembly. The carburetor solenoid selectively cuts off the flow of gasoline through the carburetor and to the engine.



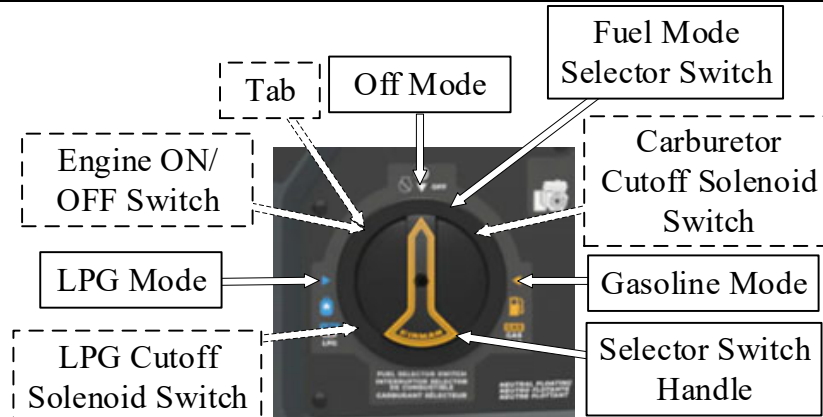
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The LPG solenoid is coupled to an on-board LPG regulator and selectively cuts off the flow of LPG to the carburetor.



The selector switch tab engages the engine switch in Off Mode. When engaged, the engine switch grounds the engine ignition coil to prevent the engine from starting or running. When not engaged, the engine ignition coil is not grounded, which allows the engine to start and run.

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**(Dashed lines indicate components hidden behind
the selector switch and/or front panel)**

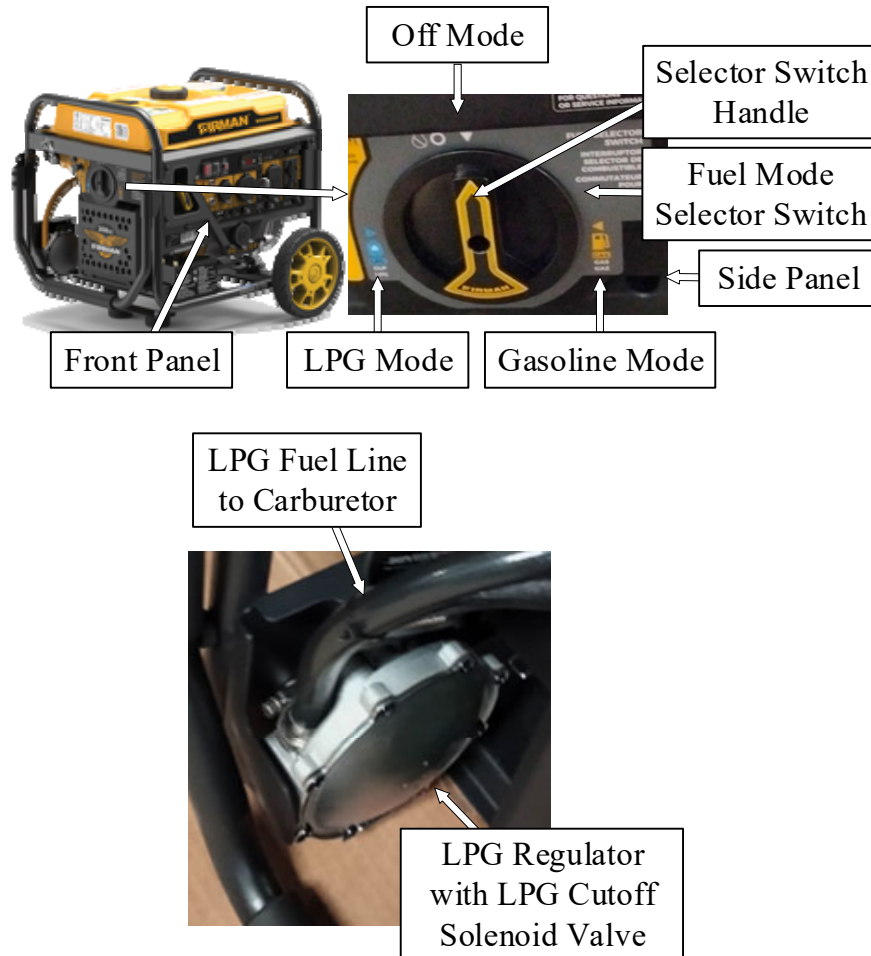
The selector switch engages the carburetor solenoid switch while rotating to Gasoline Mode from Off Mode, but before reaching Gasoline Mode. This engagement causes the carburetor solenoid to actuate to an open position to allow gasoline to flow through the carburetor to the engine when the selector switch is in Gasoline Mode. The selector switch engages the carburetor solenoid switch again while rotating to Off Mode from Gasoline Mode. This engagement causes the carburetor solenoid to actuate to a closed position to prevent gasoline from flowing through the carburetor to the engine in any mode other than Gasoline Mode.

The selector switch engages the LPG solenoid switch after rotating to LPG Mode from Off Mode. This engagement causes the LPG solenoid to actuate to an open position and allow LPG to flow to the carburetor. The selector switch disengages the LPG solenoid switch when rotating to Off Mode from LPG Mode. This disengagement causes the LPG solenoid to actuate to a closed position and prevent LPG from flowing to the carburetor.

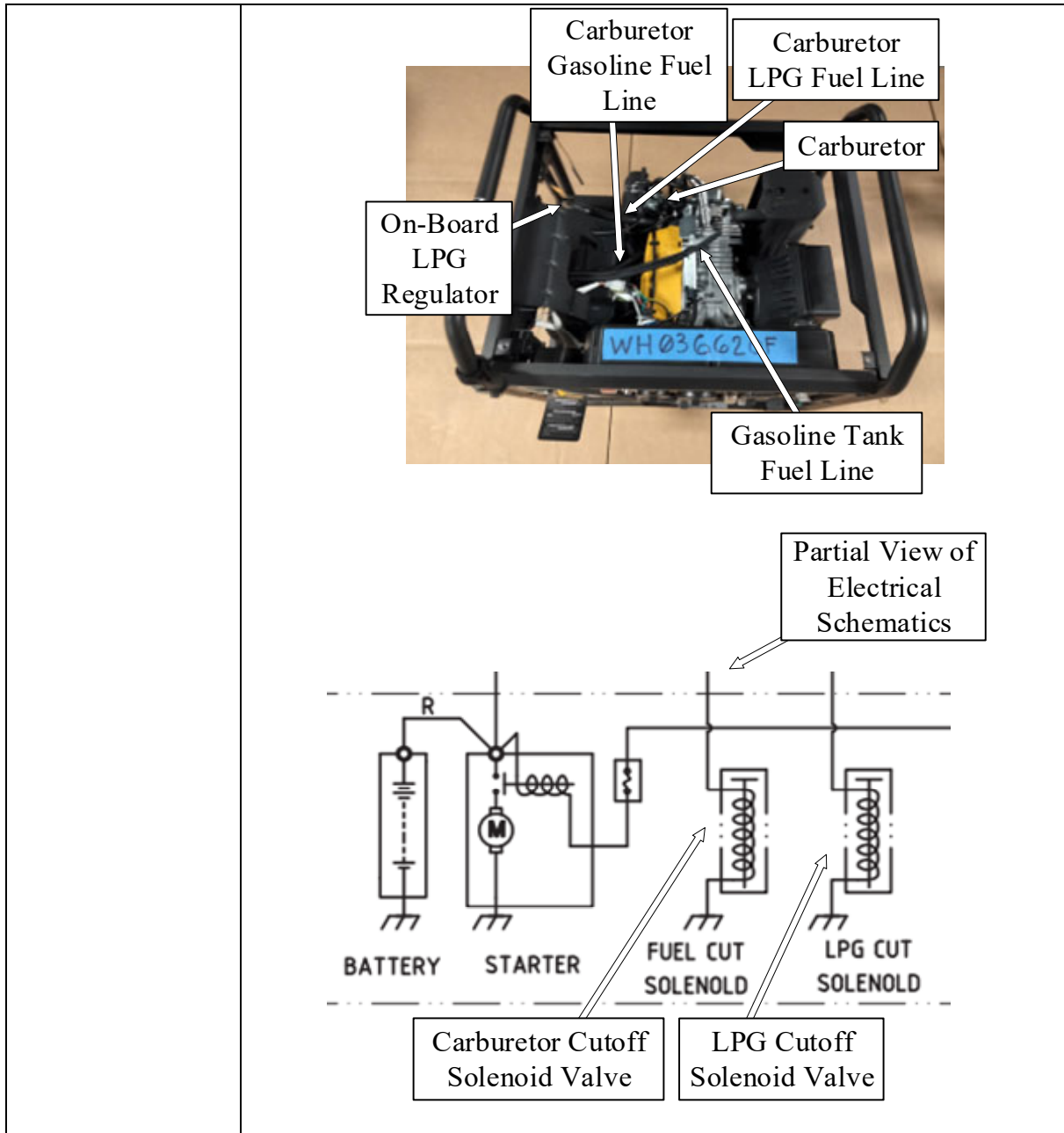
In view of the above, the selector switch and the three electrical switches are an electro-mechanical switch “to change operation of the engine between gaseous fuel and liquid fuel.”

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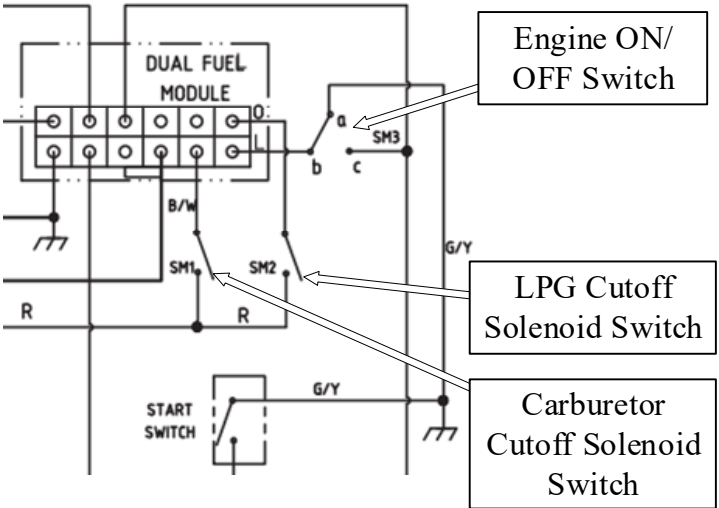
Additional images for Model WH03662OF:



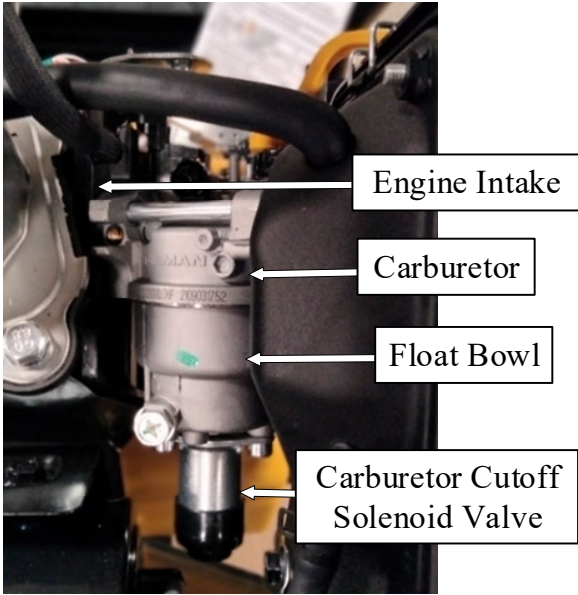
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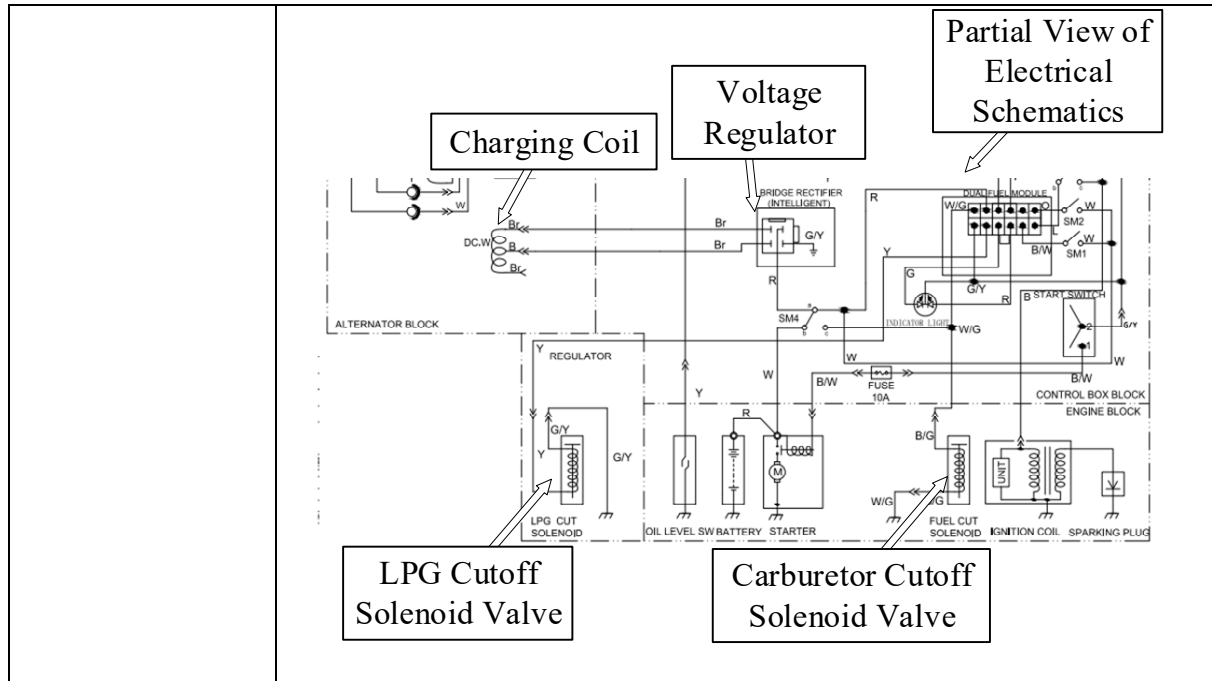
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	Partial View of Electrical Schematics 
(d) a carburetor attached to an intake of the engine to mix air and fuel and connect to a gaseous fuel source and a liquid fuel source;	Element (d) of claim 1 is found within Model H05751 (and, thereby, the remaining models outlined in (a)–(v) above) directly and literally as follows: Model H05751 includes a carburetor attached to an intake of the dual fuel engine to mix air and fuel and connect the gasoline tank and LPG tank to the intake. Firman infringes element (d) of claim 1 even when an LPG tank is not attached to the generator and when gasoline is not present in the liquid fuel source because the dual-fuel engine is operable from LPG from a gaseous fuel source. But even were an LPG tank required for infringement, Firman induces and contributes to that infringement by instructing the user to attach an LPG tank to the generator, and the infringement is complete when the user attaches the LPG tank and fills the liquid fuel source with gasoline. Firman's acts contributing to and inducing infringement are discussed in Section VII, which are incorporated herein by reference.

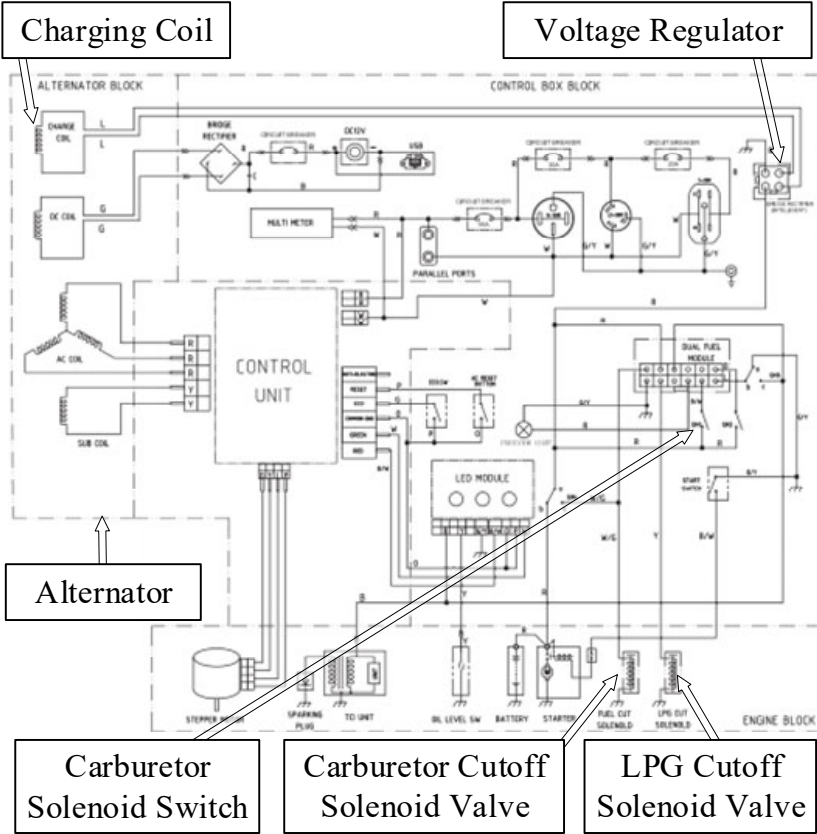
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(e) a liquid fuel cut-off solenoid to interrupt liquid fuel flow to the engine upon actuation of the switch from liquid fuel to gaseous fuel; and	Element (e) of claim 1 is found within Model H05751 (and, thereby, the remaining models outlined in (a)–(v) above) directly and literally as follows: The carburetor solenoid is a liquid fuel cut-off solenoid coupled to the carburetor float bowl to open and close a liquid fuel path for gasoline to the engine downstream from the float bowl, as shown above with respect to element (d) of claim 1.
(f) a voltage regulator coupled to the charging coil to receive power therefrom and that operates to provide a regulated voltage to the liquid fuel cut-off solenoid.	Element (f) of claim 1 is found within Model H05751 (and, thereby, the remaining models outlined in (a)–(v) above) directly and literally as follows: Model H05751 includes a voltage regulator coupled to the charging coil to receive power therefrom and that operates to provide a regulated voltage to the carburetor solenoid.

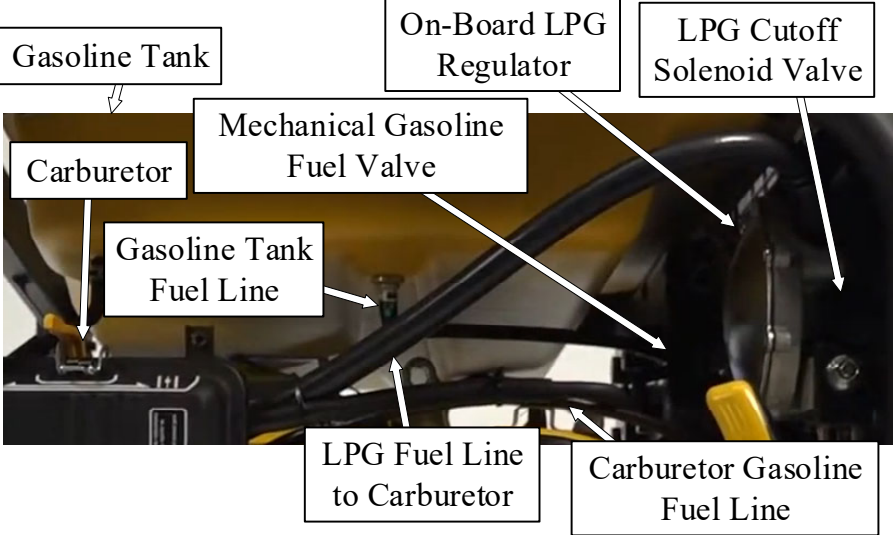
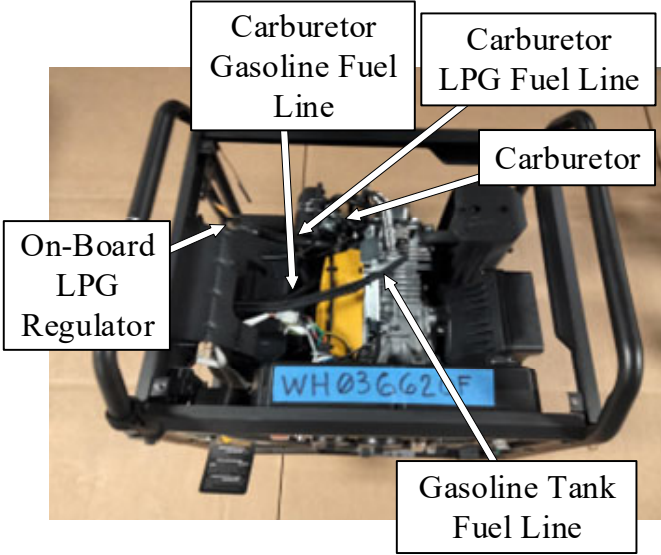
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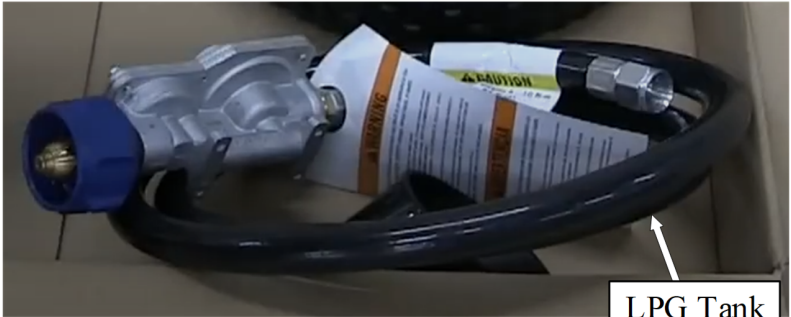
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	Additional image for Model WH03662OF: 
2. (Preamble) The dual fuel generator of claim 1 further comprising:	The preamble of claim 2 is found within Model H05751 (and, thereby, the remaining models outlined in (a)–(v) above) directly and literally as follows: Champion incorporates by reference in claim 2 the contentions set forth above for claim 1.
(a) a liquid fuel valve along a liquid fuel line coupling the liquid fuel source to the carburetor; and	Element (a) of claim 2 is found within Model H05751 (and, thereby, the remaining models outlined in (a)–(v) above) directly and literally as follows: The gasoline valve is a liquid fuel valve along a liquid fuel line coupling the gasoline tank to the carburetor. The liquid fuel line includes a gasoline tank fuel line that supplies gasoline from the

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	gasoline tank to the gasoline valve and a carburetor gasoline fuel line that supplies gasoline from the gasoline valve to the carburetor.  Additional image for Model WH03662OF: 
(b) a gaseous fuel valve along a gaseous fuel line coupling the gaseous fuel	Element (b) of claim 2 is found within Model H05751 (and, thereby, the remaining models outlined in (a)–(v) above) literally as follows: The LPG solenoid is a gaseous fuel valve along a gaseous fuel line coupling a pressurized LPG tank to the carburetor. The gaseous fuel line includes an LPG tank fuel line on LPG hose external to the

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source to the carburetor.	generator that supplies LPG from the LPG tank to the on-board LPG regulator via the LPG fuel inlet on the front panel of the generator. The gaseous fuel line also includes a carburetor LPG fuel line that supplies the LPG from the on-board LPG regulator to the carburetor. The LPG solenoid is coupled to the on-board regulator between the LPG tank fuel line and the carburetor LPG fuel line. Firman induces and contributes to that infringement by instructing the user to couple an LPG tank to the generator. Firman's acts contributing to and inducing infringement are discussed in Section VII, which are incorporated herein by reference.  LPG Hose LPG Tank Fuel Line
4. The dual fuel generator of claim 2, wherein the liquid fuel cut-off solenoid is attached to the carburetor.	Claim 4 is found within Model H05751 (and, thereby, the remaining models outlined in (a)–(v) above) directly and literally as follows: Champion incorporates by reference in claim 4 the contentions set forth above for claims 1 and 2. As shown in element (d) of claim 1, the carburetor solenoid is coupled to the carburetor's float bowl.
5. The dual fuel generator of claim 1, wherein the gaseous fuel is	Claim 5 is found within Model H05751 (and, thereby, the remaining models outlined in (a)–(v) above) directly and literally as follows:

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LPG and the liquid fuel is gasoline.	Champion incorporates by reference the contentions set forth herein for claim 1. As similarly explained above with respect to the preamble of claim 1, Model H05751 has a dual fuel engine that is designed to operate on gaseous LPG and liquid gasoline.
6. (Preamble) The dual fuel generator of claim 1,	Claim 6 is found within Model H05751 (and, thereby, the remaining models outlined in (a)–(v) above) directly and literally as follows: Champion incorporates by reference in claim 6 the contentions set forth above for claim 1.
(a) wherein the switch is an electro-mechanical switch connecting one fuel source to the carburetor and connected to the electrical power generator, and	Element (a) of claim 6 is found within Model H05751 (and, thereby, the remaining models outlined in (a)–(v) above) directly and literally as follows: As similarly explained above with respect to element (c) of claim 1, the selector switch and three electrical switches engaged by the selector switch tab are an electro-mechanical switch that connects either the gasoline tank or the LPG tank to the carburetor and is connected to the alternator. Firman infringes element (a) of claim 6 even when an LPG tank is not attached to the generator. But even were an LPG tank required for infringement, Firman induces and contributes to that infringement by instructing the user to attach an LPG tank to the generator, and the infringement is complete when the user attaches the LPG tank. Firman's acts contributing to and inducing infringement are discussed in Section VII, which are incorporated herein by reference.
(b) wherein the liquid fuel cut-off solenoid is connected to open and close a fuel path to the engine in response to reception of	Element (b) of claim 6 is found within Model H05751 (and, thereby, the remaining models outlined in (a)–(v) above) directly and literally as follows: The carburetor solenoid (the liquid cut-off solenoid) is connected to the float bowl of the carburetor to open and close the gasoline fuel path therethrough in response to receiving electrical power from the alternator upon actuation of the carburetor solenoid switch.

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electrical power from the switch.	
7. The dual fuel generator of claim 6, wherein the switch selectively powers the solenoid valve by controlling electrical connection between the solenoid valve and the electrical power generator.	Claim 7 is found within Model H05751 (and, thereby, the remaining models outlined in (a)–(v) above) directly and literally as follows: Champion incorporates by reference in claim 7 the contentions set forth above for claims 1 and 6. As similarly explained above with respect to element (c) of claim 1 and element (a) of claim 6, the selector switch and the three electrical switches collectively are “an electro-mechanical switch” “to change operation of the engine between gaseous fuel and liquid fuel” and “connecting one fuel source to the carburetor and connected to the electrical power generator.” The carburetor solenoid switch of the electro-mechanical switch controls electrical connection between the carburetor solenoid (the liquid fuel cut-off solenoid) and the alternator. The carburetor solenoid switch selectively provides power to the carburetor solenoid when the selector switch tab engages the carburetor solenoid switch.