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MERIDIAN INTERNATIONAL CO., LTD.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SOUTHERN DIVISION

MERIDIAN INTERNATIONAL CO., LTD.,

Plaintiff and Counter Defendant,

v.

TOUGHBUILT INDUSTRIES, INC.,

Defendant and Counter Claimant.

AND RELATED COUNTERCLAIMS.

Case No. 8:24-cv-01840 JWH (JDEx)

PLAINTIFF MERIDIAN INTERNATIONAL CO. LTD.'S INFRINGEMENT CONTENTIONS

CONTAINS HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY INFORMATION ON PAGES SO DESIGNATED

Pursuant to the February 28, 2025 Scheduling Order (ECF No. 80), Plaintiff and Counter Defendant Meridian International Co., Ltd. ("Meridian" or "Plaintiff") makes the following Infringement Contentions, including the attached claim charts to Defendant and Counter Claimant ToughBuilt Industries, Inc. ("ToughBuilt" or "Defendant").

Meridian makes these Infringement Contentions based upon information presently known and reasonably available to it as of this date, as Meridian's investigations are ongoing and ToughBuilt has not completed discovery. Accordingly, Meridian reserves the right to amend, modify, supplement, or narrow any portion of these Infringement Contentions, including, but not limited to, the identification of the claims infringed by ToughBuilt, the products accused of infringement, and the bases and manner of infringement described in these Infringement Contentions. Meridian reserves the right to supplement these Infringement Contentions as necessary and as appropriate in accordance with the Federal Rules of Civil Procedure and/or the Local Rules in light of future document production, interrogatory responses, admissions, disclosures, fact witness testimony, expert discovery, any other discovery, future rulings from the Court, any amendments to the pleadings, any additional items of evidence, and/or for any other reason authorized by statute, rule, or applicable case law. Meridian further reserves the right to rely upon the opinions of one or more experts in support of its Infringement Contentions in accordance with the Court's scheduling order.

To the maximum degree allowed by the Federal Rules of Civil Procedure and the Local Rules, Meridian reserves its right to supplement, amend, modify and/or narrow these Infringement Contentions, as appropriate, as the extent of infringement becomes more fully known, the Court makes any relevant rulings, and the case develops over the course of discovery.

I. DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS

A. Identification of Asserted Claims.

ToughBuilt has infringed and continues to infringe at least claims 1-7, 9-16 of U.S. Patent No. 11,986,946 ("the '946 patent") and at least claims 1-6 of U.S. Patent No. 11,192,689 ("the '689 patent").

Because ToughBuilt has not yet completed discovery, the above identification is based on the information publicly available to Meridian and the limited discovery provided as of the date hereof. Meridian reserves the right to amend, modify, supplement, or narrow these contentions, as appropriate, including identifying additional asserted claims, as it obtains additional information over the course of discovery.

B. Identification of Infringing Instrumentalities.

Meridian accuses ToughBuilt's modular stackable storage boxes marketed under the "StackTech" brand of infringing the '946 patent, including but not limited to, at least the following StackTech® line of products: TOUGHBUILT STACKTECH 22.3-in W x 26-in H Black Plastic/Metal Wheels Tool Box (Model TB-B1-B-70R); TOUGHBUILT STACKTECH XL 21-in W x 15.6-in H Black Plastic/Metal Tool Box (Model TB-B1-B-70); TOUGHBUILT STACKTECH Large 21-in W x 11.7-in H Black Plastic/Metal Tool Box (Model TB-B1-B-50); TOUGHBUILT STACKTECH 21-in Black Plastic/Metal Tool Box (Model TB-B1-B-30); TOUGHBUILT STACKTECH Crate 21-in W x 11.4-in H Black Plastic/Metal Tool Box (Model TB-B1-X-50); TOUGHBUILT STACKTECH Compact 10.4-in Black Plastic/Metal Tool Box (Model TB-B1-B-60C); TOUGHBUILT STACKTECH 11-Compartment Large Plastic Small Parts Organizer (Model TB-B1-O-30); TOUGHBUILT 22-Compartment STACKTECH Low-Profile Plastic Small Parts Organizer (Model TB-B1-O-10); TOUGHBUILT 12-Compartment STACKTECH Compact Low-Profile Plastic Small Parts Organizer (Model TB-B1-O-10C); TOUGHBUILT STACKTECH XL 21-in W x 15.6-in H Ball-bearing 3-Drawer Black Plastic/Metal Tool Box (Model TB-B1-D-70-3); TOUGHBUILT STACKTECH 21-in W x 8.8-in H Ball-bearing 1-Drawer Black Plastic/Metal Tool Box (Model TB-B1-D-30-1); TOUGHBUILT STACKTECH XL

White 38-Quart Insulated Chest Cooler (Model TB-B1-C-70); and TOUGHBUILT STACKTECH Compact White 16-Quart Insulated Chest Cooler (Model TB-B1-C-60C) (collectively, the "Accused StackTech Products").

Meridian accuses ToughBuilt's modular storage containers marketed under the "CaseStack" brand of infringing the '689 patent, including but not limited to, at least the following products: the Kobalt CaseStack Blue Polyester 20-in Zippered Tool Bag (model number KB-CS-S20) and Kobalt CaseStack Blue Polyester 20-in Tool Tote (model number KB-CS-T20) (together, the "Accused Modular Tool Bags").

Collectively the Accused StackTech Products and the Accused Modular Tool Bags will be referred to as the Accused Products.

More complete information about the Accused Products that Defendant has sold is in the possession of Defendant and is expected to be obtained through discovery and document production. Any additional products sold by Defendant with the claimed features are included within the scope of "Accused Products," regardless of whether listed above.

Because ToughBuilt has not yet completed discovery, the above identification is based on the information publicly available to Meridian and the limited discovery provided as of date hereof. Meridian anticipates that discovery will reveal additional products, features and/or services that infringe the patents-in-suit. Meridian reserves the right to amend, modify, supplement, or narrow these contentions, if necessary and appropriate, including identifying additional products, features and/or services, as it obtains additional information over the course of discovery.

C. Claim Charts

The attached Appendix A shows how the Accused StackTech Products infringe each of the asserted claims of the '946 patent).

The attached Appendix B shows how the Accused Modular Tool Bags infringe each of the asserted claims of the '689 patent).

Appendix A and Appendix B (collectively, the "Appendices") are incorporated

by reference as if fully set forth herein. Any citations included in the Appendices are exemplary only and are not limiting. In the attached Appendices, Meridian has subdivided certain claims to explain where the respective Accused Instrumentalities and other products meet each claim limitation. The subdivisions in the Appendices are not to be taken as an indication of the boundaries of claim elements with respect to doctrine of equivalents, or any other issue. Additionally, the Accused Instrumentalities and ToughBuilt's other products may infringe the Asserted Claims in multiple ways.

Where the charts incorporate information or photographs of particular versions of the Accused Products, the reference to those versions is exemplary and not to the exclusion of any other versions of the Accused Products or any versions related to the Accused Products.

Because ToughBuilt has not yet completed its production or responses to outstanding discovery requests, the above identification is based on the information publicly available to Meridian and the limited discovery provided as of date hereof. Meridian reserves the right to provide an alternative claim mapping or infringement contentions for such Accused Instrumentalities or other products and/or services as appropriate, as it obtains additional information over the course of discovery. Meridian further reserves the right to rely upon the opinions of one or more experts in support of its Infringement Contentions in accordance with the Court's scheduling order.

D. Method of Infringement

ToughBuilt directly infringes each of the asserted claims of the '946 patent. ToughBuilt indirectly infringes each of the asserted claims of the '946 patent by providing products operating as the "another storage box" in claim 1 and claims depending therefrom. Direct infringement occurs when an end-user purchases one of the Accused StackTech Products operating as the "storage box" in claim 1 and claims depending therefrom to be used with any previous, contemporaneous, or later purchased Accused StackTech Products operating as the "another storage box" in claim 1 and claims depending therefrom. ToughBuilt induces infringement by branding the

Accused StackTech Products as containing "StackTech" functionality and through its marketing materials and user manuals which encourage end-users to use the Accused StackTech Products in conjunction with each other and with other StackTeck technology. ToughBuilt contributorily infringes by offering the Accused StackTech Products for sale. The Accused StackTech Products are also especially adapted for use in the claimed invention and the connection components have no substantial non-infringing uses.

ToughBuilt indirectly infringes each of the asserted claims of the '689 patent. Direct infringement occurs when an end-user purchases one of the Accused Modular Tool Bags to be used with any previous, contemporaneous, or later purchased CaseStack technology. ToughBuilt induces infringement by branding the Accused Modular Tool Bags as containing "CaseStack" functionality and through its marketing materials and user manuals which encourage end-users to use the Accused Modular Tool Bags in conjunction with other CaseStack technology. ToughBuilt contributorily infringes by offering the Accused Modular Tool Bags for sale. The Accused Modular Tool Bags are also especially adapted for use in the patented system and the connection component has no substantial non-infringing uses.

At the present time, Meridian does not contend the Asserted Claims have been infringed based on joint acts by multiple parties.

Meridian reserves the right to amend, modify, augment, and/or supplement its direct and indirect Infringement Contentions based on information obtained through discovery, document production, after claim construction, or any other permissible grounds.

E. Literal Infringement and Doctrine of Equivalents

Meridian presently asserts that each limitation of each Asserted Claim is literally present within each of the Defendant's Accused Products.

To the extent any differences are alleged to exist between the Asserted Claims and the Accused Products, such differences are insubstantial and the Accused Products

perform substantially the same function, in substantially the same way, to yield substantially the same result, and therefore the Accused Products infringe under the doctrine of equivalents.

Meridian reserves the right to amend, modify, augment, and/or supplement its disclosure concerning literal infringement and/or the doctrine of equivalents based on additional information obtained through discovery and/or based on the Court's claim construction.

F. Priority Dates

Without prejudice to its right to assert other earlier dates, the Asserted Claims of the Asserted Patents are entitled to at least the following claims of priority to an earlier application:

Each asserted claim of the '946 patent claims priority to application No. 18/176,907, filed March 1, 2023, which in turn claims priority to foreign applications CN 202210212862.5 filed March 4, 2022 and CN 202320135456.3 filed January 13, 2023. Claims 6, 13, 14 and 16 of the '946 patent are entitled to the March 4, 2022 priority date. All other asserted claims of the '946 patent are entitled to a priority date of March 4, 2022.

Each asserted claim of the '689 patent claims priority to foreign application CN 201922118361.7 filed November 27, 2019. Each asserted claim of the '689 patent is entitled to a priority date of November 27, 2019.

Meridian reserves the right to amend, modify, augment, and/or supplement its direct and indirect Infringement Contentions based on information obtained through discovery, document production, after claim construction, or an any other permissible grounds.

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H. Date of First Infringement

Based on information presently available to it, and without prejudice to its right to assert other earlier dates, Meridian contends the date of first infringement and the start of claimed damages is the date of the first sale of the Accused Products after the patents came into force, and the end of claimed damages is the earlier of the date of the last sale of the Accused Products or the last expiration date of the Asserted Claims.

For example, ToughBuilt's infringement of the '946 patent began on the date of issuance of the patent: May 21, 2024 as Meridian believes the Accused StackTech Products were on sale prior to the issuance of the '946 patent. Infringement is ongoing and damages continue to accrue.

ToughBuilt's infringement of the '689 patent began on or before November 24, 2023. Because ToughBuilt has records reflecting the first sales date of the Accused Modular Tool Bags, once produced, those records will accurately reflect the start date of infringement of the '689 patent. Infringement is ongoing and damages continue to accrue.

I. Willfulness Infringement

Based on information presently available to it, and without prejudice to its right to assert other earlier dates, Meridian contends that Defendant had actual knowledge of and an intent to infringe at least the '946 patent as of at least June 5, 2024 when Meridian sent a cease-and-desist letter to the counsel identified on Defendant's public website attaching a copy of the patent and claim charts showing how Defendants products infringed the '946 patent. Defendant had actual knowledge of and an intent to infringe the '689 patent at least as early as August 21, 2024, the filing date of the Complaint.

DATED: March 21, 2025

Respectfully submitted,

EVERSHEDS SUTHERLAND (US) LLP



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MERIDIAN INTERNATIONAL CO., LTD.

CERTIFICATE OF SERVICE

I am a citizen of the United States of America and I am employed in San Diego, California. I am over the age of 18 and not a party to the within action. My business address is 12255 El Camino Real, Suite 100, San Diego, California 92130.

On March 21, 2025, I caused to be served the within **PLAINTIFF MERIDIAN INTERNATIONAL CO. LTD.'S INFRINGEMENT CONTENTIONS** on the parties or their counsel shown below, by electronic service pursuant to the parties agreement regarding accepting electronic service dated December 2, 2024, to the following email addresses:

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Dated: March 21, 2025

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SCOTT A. PENNER

Appendix A

Infringement Claim Chart Showing Infringement of U.S. Patent 11,986,946 by the ToughBuilt StackTech 21-in Black Plastic/Metal Tool Box (Model Number TB-B1-B-30, the "Tool Box") Used With the ToughBuilt StackTech 11-Compartment Large Plastic Small Parts Organizer (Model Number TB-B1-O-30, the "Organizer")

Claim Language	Elements in the Tool Box Used With the Organizer[1]
Claim 1[2]	
[1a] A storage box comprising:	The Tool Box is a storage box. For example: The Tool Box includes an interior storge compartment adapted to store items in dividers and bins. ToughBuilt describes these accused products as tool boxes, organizers, and chest coolers. The following images were obtained from ToughBuilt's website for the Tool Box:

[1] As set forth in the Complaint, Meridian International, Co., Ltd. alleges that the following products infringe U.S. Patent 11,986,946: TOUGHBUILT STACKTECH 22.3-in W x 26-in H Black Plastic/Metal Wheels Tool Box (Model TB-B1-B-70R); TOUGHBUILT STACKTECH XL 21-in W x 15.6-in H Black Plastic/Metal Tool Box (Model TB-B1-B-70); TOUGHBUILT STACKTECH Large 21-in W x 11.7-in H Black Plastic/Metal Tool Box (Model TB-B1-B- 50); TOUGHBUILT STACKTECH 21-in Black Plastic/Metal Tool Box (Model TB-B1-B-30); TOUGHBUILT STACKTECH Crate 21-in W x 11.4-in H Black Plastic/Metal Tool Box (Model TB-B1-X-50); TOUGHBUILT STACKTECH Compact 10.4-in Black Plastic/Metal Tool Box (Model TB-B1-B-60C); TOUGHBUILT STACKTECH 11-Compartment Large Plastic Small Parts Organizer (Model TB-B1-O-30); TOUGHBUILT 22-Compartment STACKTECH Low-Profile Plastic Small Parts Organizer (Model TB-B1-O-10); TOUGHBUILT 12-Compartment STACKTECH Compact Low-Profile Plastic Small Parts Organizer (Model TB-B1-O-10C); TOUGHBUILT STACKTECH XL 21-in W x 15.6-in H Ball-bearing 3-Drawer Black Plastic/Metal Tool Box (Model TB-B1- D-70-3); TOUGHBUILT STACKTECH 21-in W x 8.8-in H Ball-bearing 1-Drawer Black Plastic/Metal Tool Box (Model TB-B1-D-30-1); TOUGHBUILT STACKTECH XL White 38-Quart Insulated Chest Cooler (Model TB-B1-C-70); and TOUGHBUILT STACKTECH Compact White 16-Quart Insulated Chest Cooler (Model TB-B1-C-60C). Each of these products purports to feature the "StackTech" modular technology and infringe for the same reasons as the Tool Box analyzed in these charts, excepts as otherwise noted. Indirect infringement of each of the above-identified accused products occurs when the product is considered to be the "another storage box" in claim 1 and claims depending therefrom. A representative example of how such infringement occurs in shown in the following claim charts.

[2] Meridian does not assert that the TOUGHBUILT STACKTECH 22.3-in W x 26-in H Black Plastic/Metal Wheels Tool Box (Model TB-B1-B-70R) directly infringes as the "storage box" in claim 1.



(Image taken from https://toughbuilt.com/product/tb-b1-b-30-4xajl, last visited August 13, 2024.)

	 (Image taken from https://toughbuilt.com/product/tb-b1-b-30-4xajl, last visited August 13, 2024.)
1b] a first connection part disposed on one area of said storage box connectable to a second connection part of another storage box;	The Tool Box includes a first connection part disposed on one area of said storage box connectable to a second connection part of another storage box. When the Tool Box is used with the Organizer, the Organizer is the "another storage box." For example: The Tool Box includes a first connection part comprising a mounting body, a locking buckle, and a resilient member, with a slide switch disposed on the front face of the box, near the bottom surface (i.e., one area of the storage box), as shown in part in the circled portion of the following image:

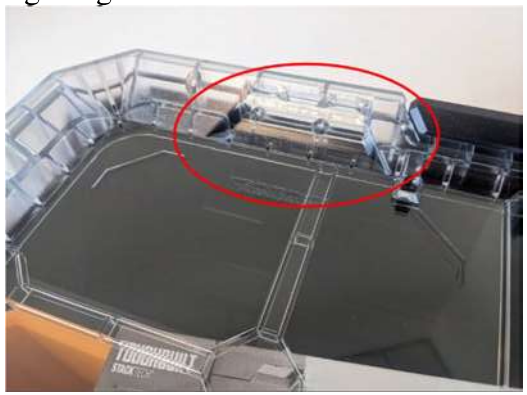
	 As set forth in greater detail below in regard to element [1c], this first connection part includes additional components located behind the exterior panel. The Organizer is another storage box:



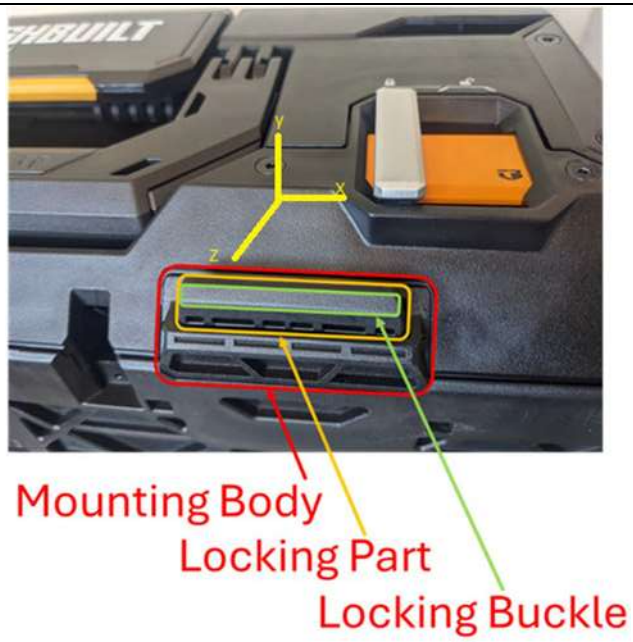
(Image taken from https://toughbuilt.com/product/tb-b1-o-30, last visited August 13, 2024.)

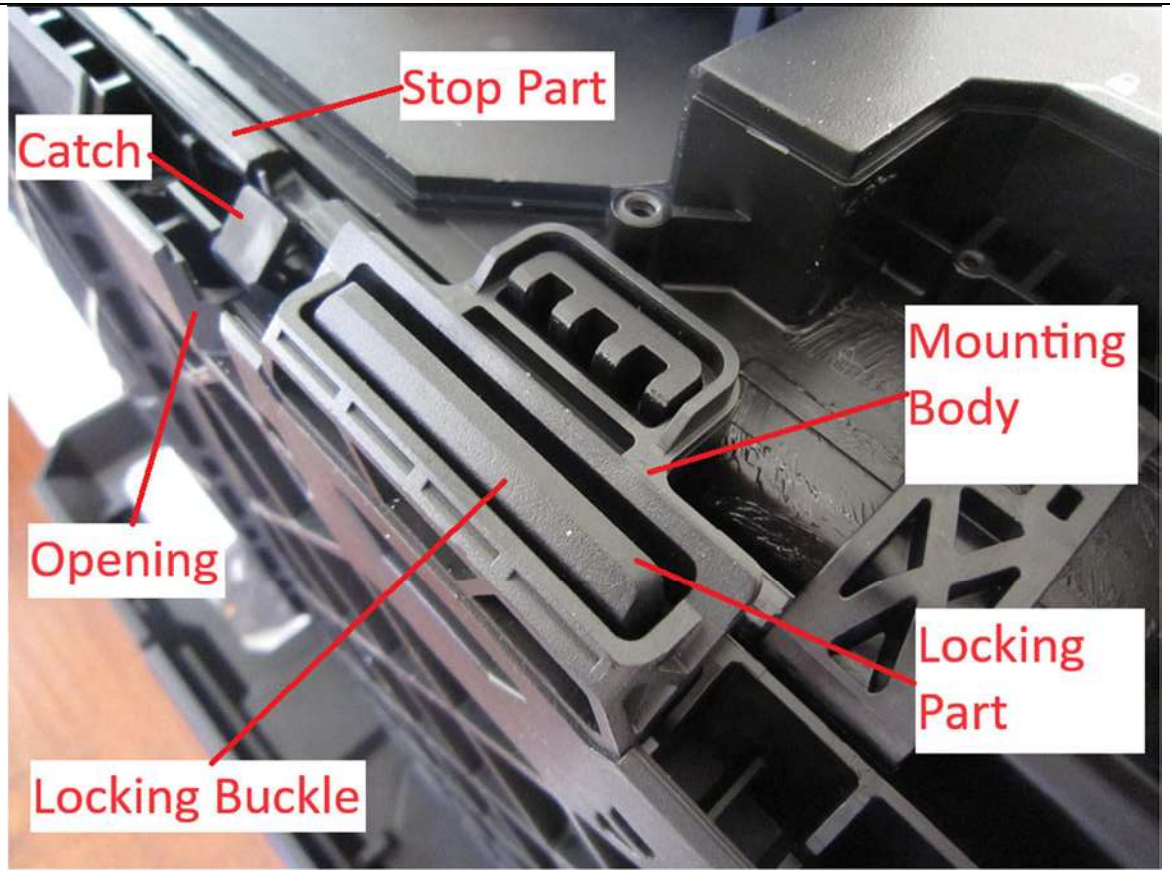


(Image taken from https://toughbuilt.com/product/tb-b1-o-30, last visited August 13, 2024.)

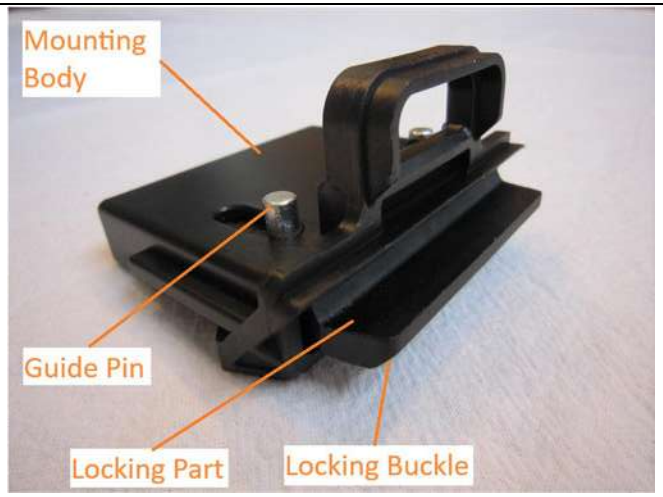
	The lid of the Organizer includes a second connection part disposed near an outer edge of the lid on the top surface of the second storage box. This second connection part defines a recessed area, as shown in the circled portion of the following image.  The first connection part on the Tool Box is connectable to the second connection part on the Organizer.  (Image taken from https://toughbuilt.com/product/tb-b1-b-30-4xajl, last visited August 13, 2024.)

	 (Image taken from https://toughbuilt.com/product/tb-b1-b-30-4xajl, last visited August 13, 2024.)
[1c] wherein, said first connection part comprises a mounting body, a locking buckle movable with respect to said mounting body, and a first resilient member located between said mounting body and said locking buckle, wherein said first resilient member keeping said locking buckle automatically in a locked state;	The first connection part of the Tool Box comprises a mounting body, a locking buckle movable with respect to said mounting body, and a first resilient member located between said mounting body and said locking buckle, wherein said first resilient member keeping said locking buckle automatically in a locked state. For example: The first connection part on the Tool Box includes a mounting body in which a locking part moves between a retracted (negative z direction) and extended (positive z direction) position. The locking part includes a locking buckle on its forward edge, as shown in the clean and annotated images below

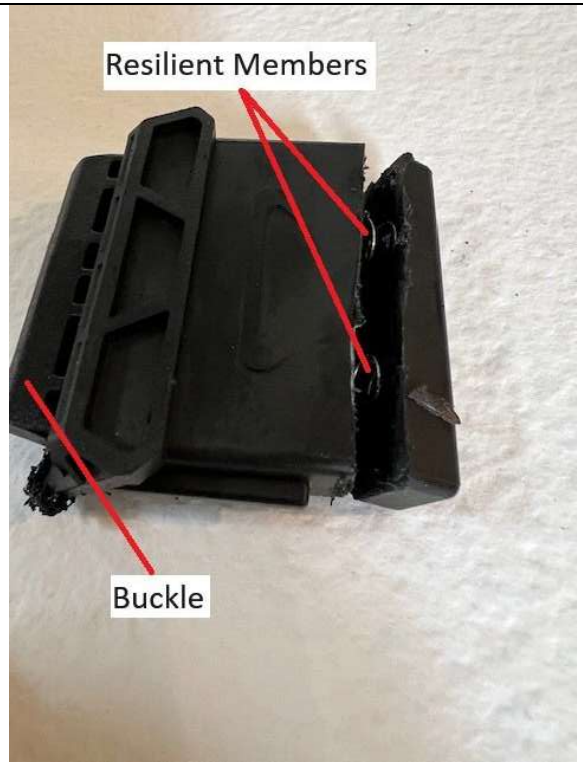
	  When an external cover component is removed, additional portions of the mounting body are shown.



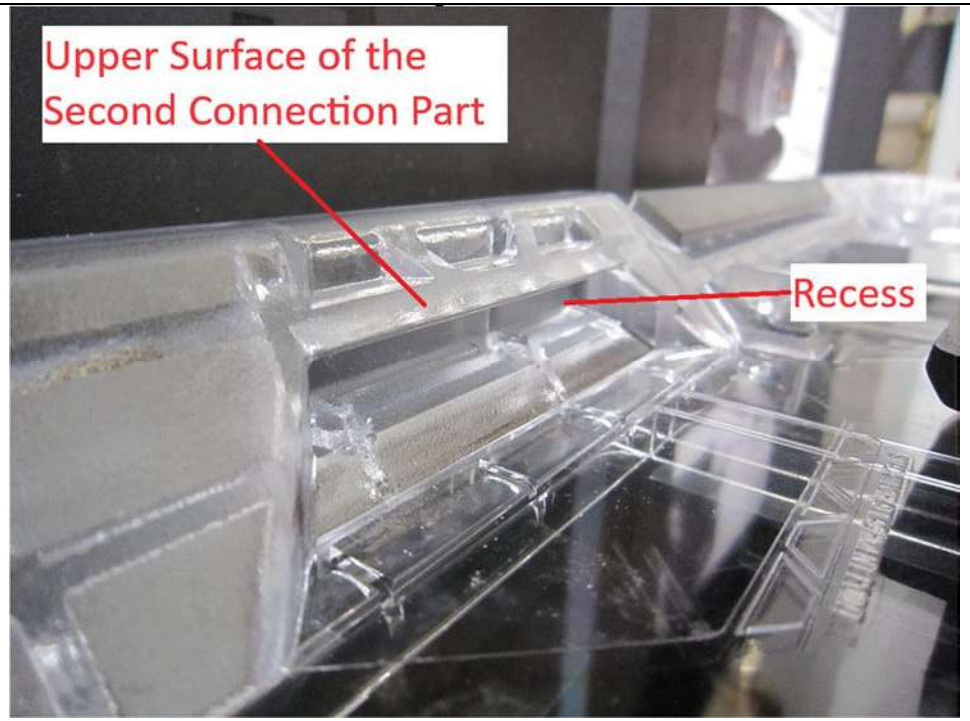
Additional portions of the mounting body are seen when that component is removed from the Tool Box.

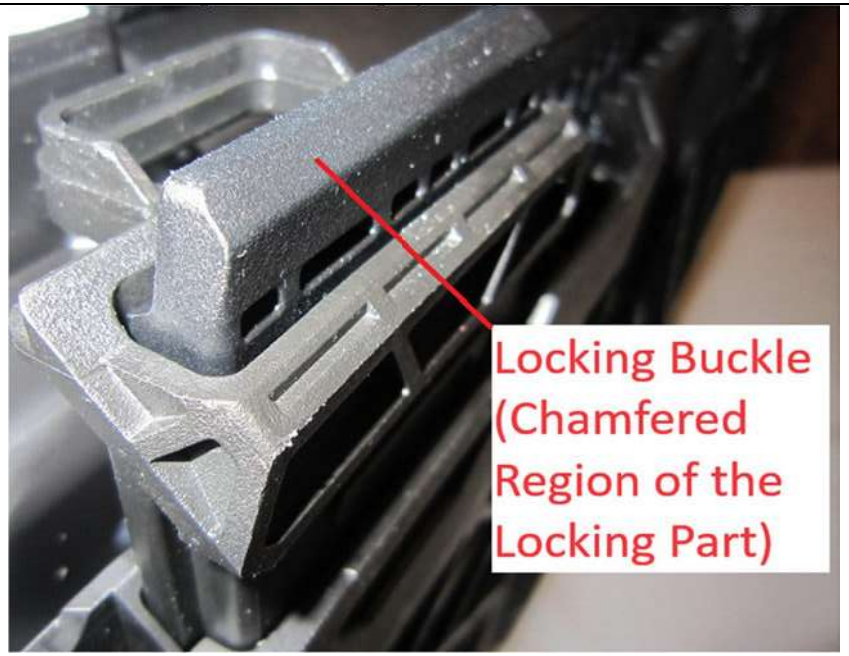
	  The locking buckle moves inward and outward relative to the front of the mounting body. That is, the locking buckle is movable with respect to said mounting body, and specifically moves between an extended (positive z direction) position (for a locked state) and a retracted (negative z direction) position (for an unlocked state), as shown below.

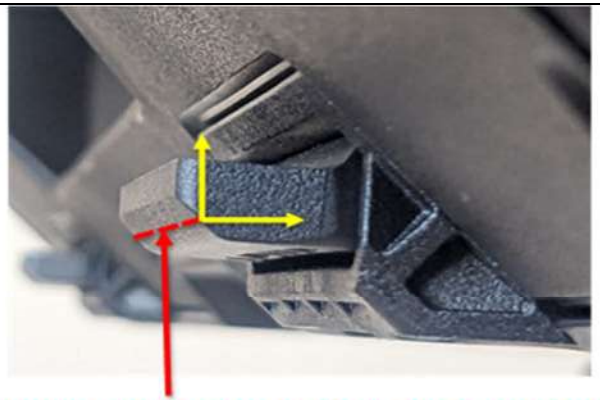
	  Locking Buckle Extended Locking Buckle Retracted The mounting body further includes a first resilient member, which is located between the locking buckle and a rear portion of the mounting body, as shown in the following image.

	 The first resilient member applies a force on the locking part, which biases the locking buckle forward (in the positive z direction) allowing it to engage with the second connection part of the Organizer).

	 
[1d] wherein, said second connection part of the other storage box comprises a mating part interlockable with the locking buckle,	The second connection part of the other storage box (i.e., the Organizer) comprises a mating part interlockable with the locking buckle. For example: The second connection part, located on the lid of the Organizer, defines a recess that serves as a mating part that is interlockable with the locking buckle of the Tool Box. See the image below. If the locking part of the first connection part is already extended in the positive z direction when the Tool Box is being placed on the Organizer, the upper surface of the second connection part interfaces with the locking buckle to force the locking part to retract against its spring bias until such time as it is aligned with, and free to enter, the recess of the second connection part.

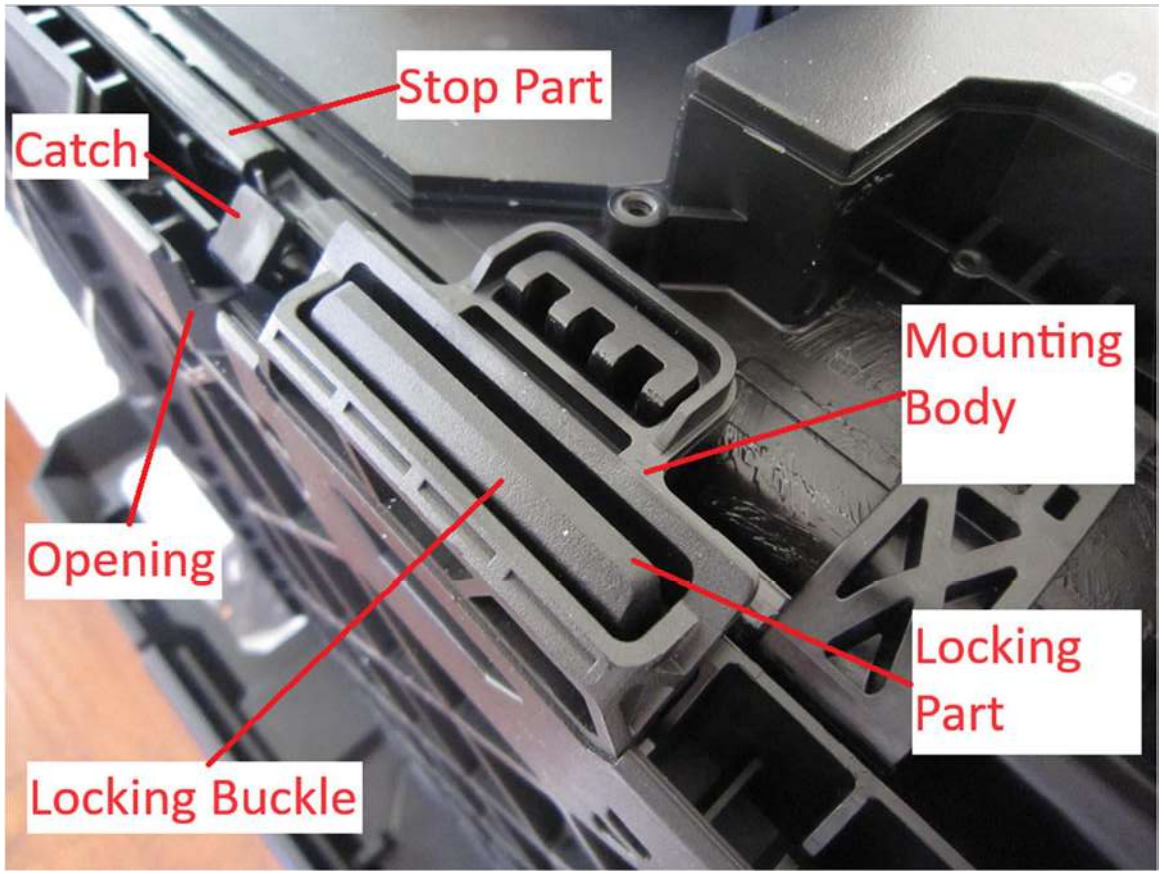
	
[1e] wherein the locking buckle is configured to slide inward with respect to the mounting part so that the locking buckle is automatically lockable with the mating part of the other storage box by action of said first resilient	The locking buckle of the Tool Box is configured to slide inward (i.e., in the negative z direction) with respect to the mounting part so that the locking buckle is automatically lockable with the mating part of the other storage box (i.e., the Organizer) by action of said first resilient member when the locking buckle is aligned with the mating part of the other storage box. For example: The locking buckle is a chamfered portion of the projecting end of the locking part.

member when the locking buckle is aligned with the mating part of the other storage box;	 As one example, if the locking part is extended in the positive z direction when the Tool Box is placed atop the Organizer, the locking buckle comes into contact with the second connection part. Given the geometrical design of the locking buckle and the second connection part, when the second connection part engages the locking buckle, a force with a vertical upward component and a horizontal inward component is applied to the locking buckle, causing the locking buckle (and the locking part) to retract inward with respect to the mounting part.



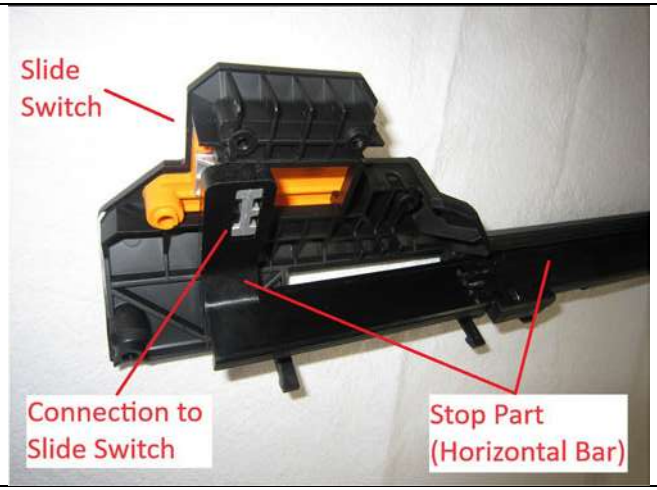
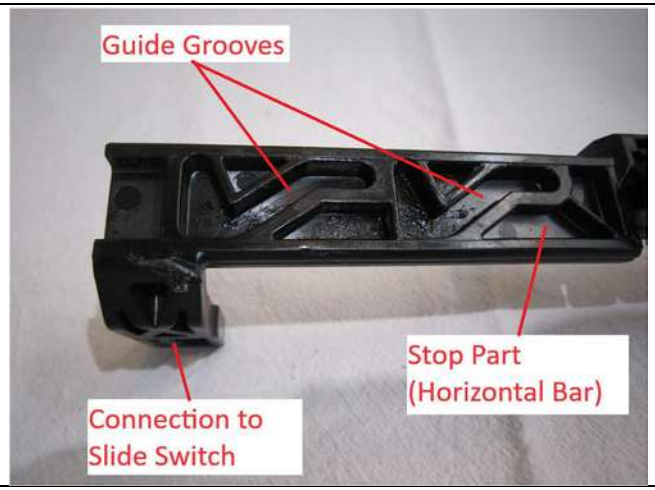
As this is happening, the first resilient member continues to bias the locking part forward in the positive z direction though this force is less than the inward-directed force caused by the interaction between the locking buckle and an upper surface of the second connection part. As the Tool Box is lowered onto the Organizer, the locking part comes into alignment with and is driven into the recess of the second connection part by the force exerted by the resilient member in the positive z direction. As a result, the locking buckle is automatically lockable with the mating part.

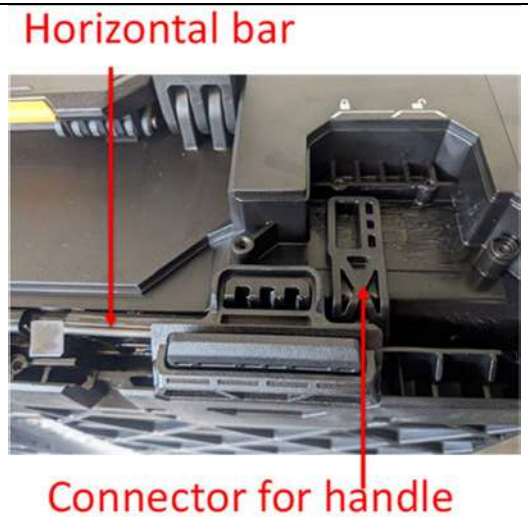
The accused products satisfy this limitation in other configurations. For example, the locking buckle is moved inward (negative z direction) and retained in a retracted position within the mounting body when the slide switch is moved to the unlocked position. Specifically, manual movement of the sliding switch moves the stop part (cleat locking cam) which drives the guide grooves (cam slots) in a manner that causes the guide pin (cam follower pins) to move the locking buckle (cleat) from a locked position to an unlocked position. *See* element [1g]. Once the locking buckle is moved inward to a retracted with respect to the mounting body by action of the slide switch, the locking buckle is automatically lockable by action of said

	first resilient member when the locking buckle is aligned with the mating part of the other storage box. This automatic locking occurs when the catch contacts the protrusion, as explained in greater detail in respect to element [1g], incorporated herein by reference. 
[1f] a locking part cooperating with the	The Tool Box includes a locking part cooperating with the locking buckle, wherein manual movement of the locking part causes the locking buckle to move to an unlocked state. For example:

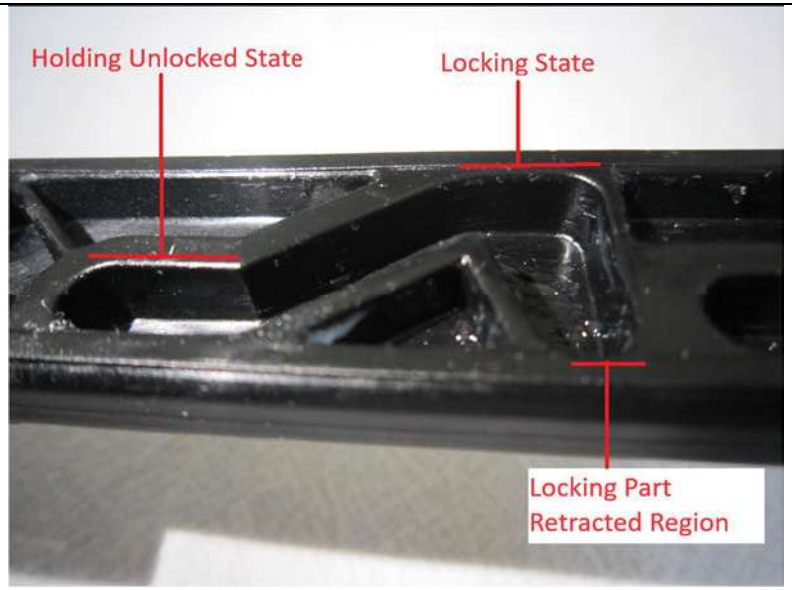
locking buckle, wherein manual movement of the locking part causes the locking buckle to move to an unlocked state; and	As indicated above (*see* elements [1c] and [1e]), the Tool Box includes a locking part having (and thus cooperating with) the locking buckle. The locking part includes guide pins that interface with guide grooves in the stop part such that horizontal movement of the stop part causes the locking part to either extend in the positive z direction or retract in the negative z direction. The stop part is connected to the slide switch so that the locking part may be manually moved to an unlocked position as a result of the slide switch being manually moved from the locked position (as indicated by an image of a closed padlock) to the unlocked position (as indicated by an image of an open padlock).  Locked Position  Unlocked Position As the slide switch is moved from the locked position to the unlocked position, the guide grooves in the stop part cause the locking part to move in the negative z direction from an extended position to a retracted position, thereby moving the locking buckle from the extended position to the unlocked position. These positions are shown in the images below.

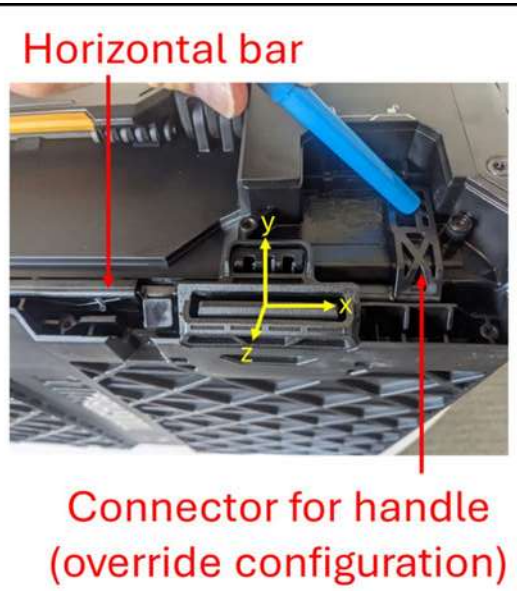
	  Locking buckle extended (locked state) Locking buckle retracted (unlocked state) Manual movement of the slide switch to the right causes the stop part (horizontal bar) to move to the right (in the positive x direction) from the leftmost locked (compressed) position to the rightmost position. As the stop part moves (*see* element [1g]), guide grooves in the stop part interact with guide pins in the locking part to cause the locking part to move in the negative z direction (in which it may be in locked engagement with the second connector part) to a unlocked position within the mounting body. *See* images of the locking part in claim element [1c] above.

	 
[1g] a stop part, wherein when the stop part projects outward with respect to a locking path of the locking part, said locking part is not automatically lockable and said first connection part is in a state of remaining unlocked from said second connection part, wherein the stop part is retractable, said stop part being extended when said first connection part is in a	The Tool Box includes a stop part, wherein when the stop part projects outward with respect to a locking path of the locking part, said locking part is not automatically lockable and said first connection part is in a state of remaining unlocked from said second connection part, wherein the stop part is retractable, said stop part being extended when said first connection part is in a holding unlocked state with said second connection part of the other storage box (i.e., the Organizer), and said stop part being compressed when said first connection part is in a locked state with said second connection part. For example: The stop part is comprised of a horizontal bar, with guide grooves, attached to the slide switch.

holding unlocked state with said second connection part of the other storage box, and said stop part being compressed when said first connection part is in a locked state with said second connection part.	 In addition to having the locked and unlocked positions discussed above, the slide switch has an override position that is underneath the image of an unlocked padlock (as is the unlock position discussed above).  Slide Switch in the Override Position The corresponding positions of the stop part components are shown below while the system is in a locked configuration, an unlocked configuration, and an override configuration:

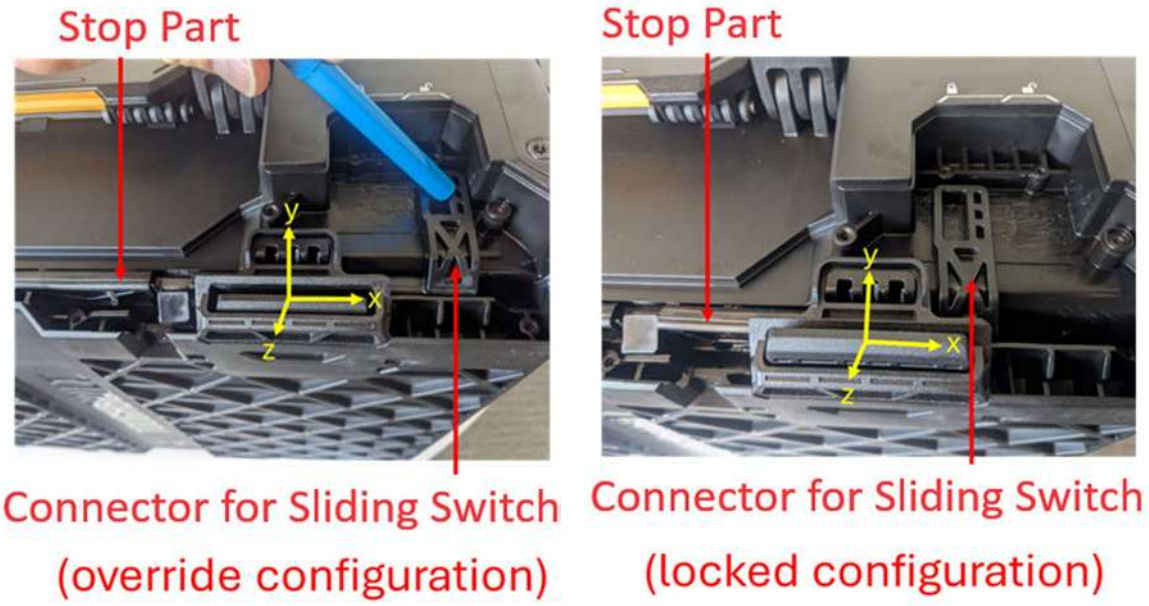
	 When the system is in an override configuration, the stop part is fully extended in a positive x direction (i.e., outward in relation to the path of the locking part along the z-axis) and the locking part is retracted in the negative z direction to render the system not automatically lockable. While in this override configuration, the portion of the stop part's guide grooves in contact with the guide pins causes the locking part to move along the locking path in a negative z direction (e.g., closer to the center of the storage box) and retain the locking part in the (negative z direction) retracted position, against the bias of the first resilient members.

	 Guide Groove in Stop Part Stop Surfaces (rearmost surfaces) of Guide Grooves



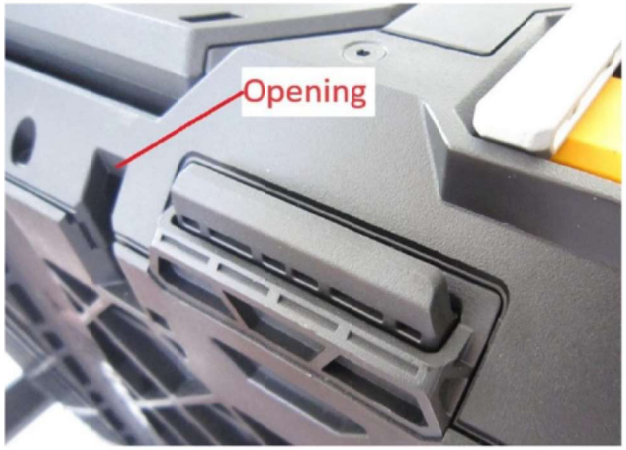
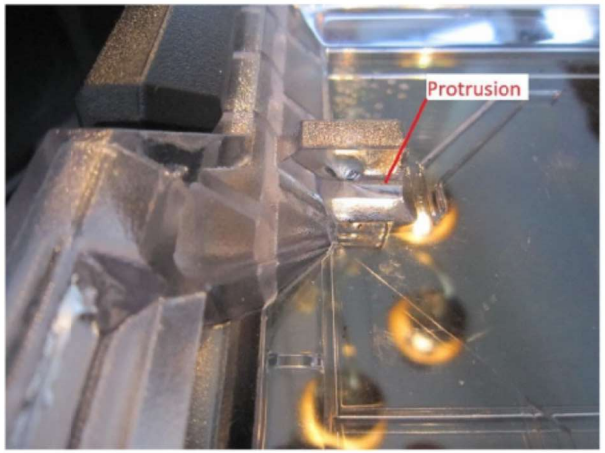
While the system remains in the override configuration, the first connection part of the Tool Box remains is in a state of remaining unlocked from said second connection part of the Organizer and the locking part is not automatically lockable because the locking part is prevented from extending in the positive z direction to engage with the recess in the second connection part.

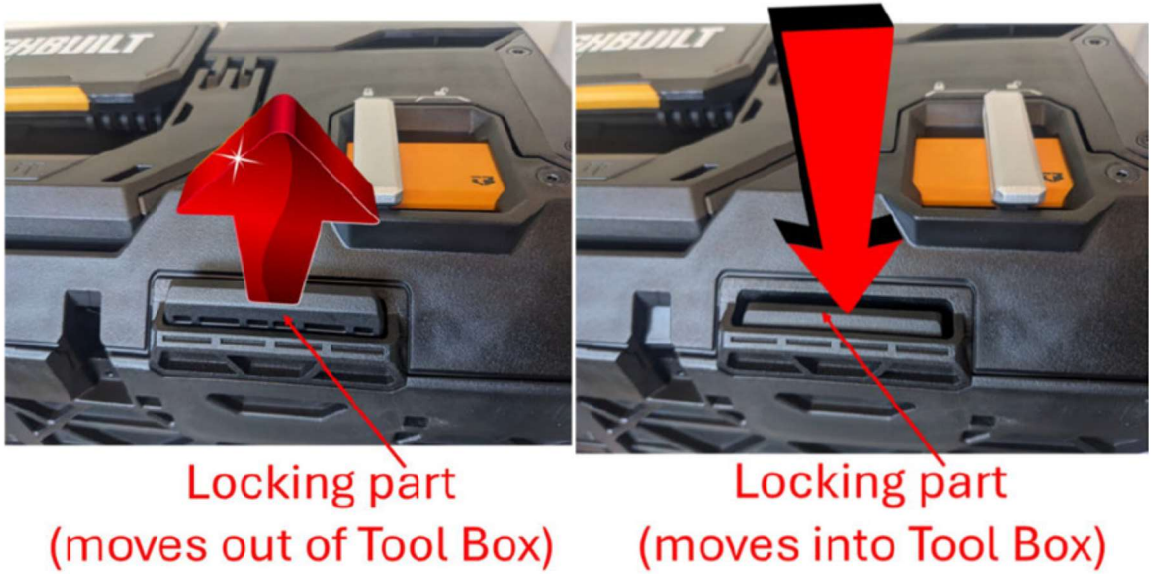
When the system transitions from an override configuration to a locked configuration (such as when the Tool Box is locked with the Organizer), the stop part retracts (moves in a negative x direction) from its extended position (in the positive x direction) to a compressed (retracted) position. In this regard, as the stop part moves in a negative x direction (i.e., from right to left when looking at the front of the box), the guide groove portions that block extension (in the positive z direction) of the locking part's guide pins no longer restrains the locking part in the retracted position, as shown in the following images:



As such, the stop part is extended in the positive x direction (causing the guide grooves to move the guide pins and locking part further in the negative z direction) when said first connection part is in an override configuration (a holding unlocked state) with the second connection part of the Organizer (the other storage box). Likewise, the stop part is compressed (causing the guide grooves to allow the guide pins and locking part to move further in the extended, positive z direction) when said first connection part is in a locked state, such as when engaged with the second connection part of the Organizer.

If the tool box is placed onto another storage box (Organizer) while the slide switch is in the override position, the first connection part will remain in a holding unlocked state with the second connection part of the other storage box. A protrusion on the other storage box (Organizer) protrudes into an opening of the Tool Box to prevent the stop part from moving any further in the negative x direction, with the guide grooves thus preventing the locking part from extending in the positive z direction to engage and lock with the

	second connection part. The protrusion and opening are identified in the images below.  
Claim 7	
[7a] The storage box of claim 1, wherein said locking part is a sliding latch for horizontal movement.	As discussed above, the Tool Box satisfies all the limitations of claim 1. The Tool Box's locking part is a sliding latch for horizontal movement. *See* claim 1. Additionally:

	 The locking part moves horizontally out of and into the Tool Box to latch onto another storage box.
Claim 9	
[9a] The storage box of claim 1, wherein two adjacent storage boxes are interlockable with each other by means of the first connection part and the second connection part of the other storage box.	As discussed above, the Tool Box satisfies all the limitations of claim 1. The Tool Box is interlockable with an adjacent storage box by means of the first connection part of the Tool Box and the second connection part of the other storage box. *See* claim 1. Additionally:



(Image taken from https://toughbuilt.com/product/tb-b1-o-30, last visited August 13, 2024.)



(Image taken from https://toughbuilt.com/product/tb-b1-o-30, last visited August 13, 2024.)

The lid of the Organizer includes a second connection part disposed near an outer edge of the lid on the top surface of the second storage box. This second connection part defines a recessed area, as shown in the circled portion of the following image.



The first connection part on the Tool Box is connectable to the second connection part on the Organizer.



(Image taken from https://toughbuilt.com/product/tb-b1-b-30-4xajl, last visited August 13, 2024.)



(Image taken from https://toughbuilt.com/product/tb-b1-b-30-4xajl, last visited August 13, 2024.)

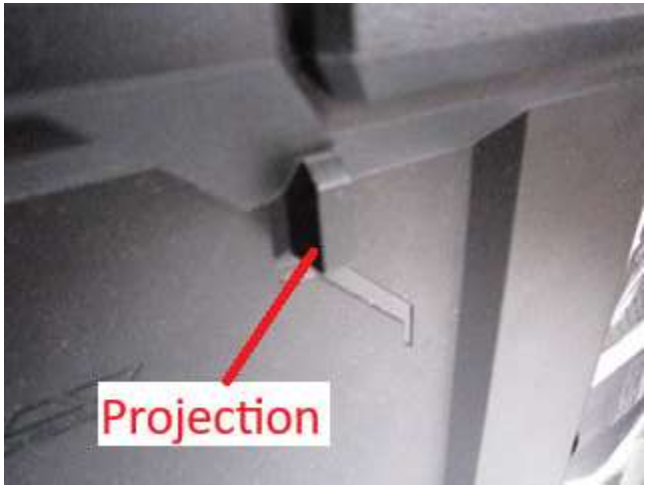
Claim 14	
[14a] The storage box of claim 1, further comprising a bottom comprising a projection, four sidewalls projecting from the bottom, a hinged lid to access an interior, and a positioning slot on the hinged lid, wherein two adjacent said storage boxes are located with respect to each other by the projection of the bottom and the positioning slot on the lid, wherein the lid comprises four projections and the bottom comprises four positioning recesses, wherein two adjacent said storage boxes are located with respect to each other by the projection and the four positioning recesses on the bottom and the	As discussed above, the Tool Box satisfies all the limitations of claim 1. The Tool Box further comprises a bottom comprising a projection, four sidewalls projecting from the bottom, a hinged lid to access an interior, and a positioning slot on the hinged lid, wherein two adjacent said storage boxes are located with respect to each other by the projection of the bottom and the positioning slot on the lid, wherein the lid comprises four projections and the bottom comprises four positioning recesses, wherein two adjacent said storage boxes are located with respect to each other by the projection and the four positioning recesses on the bottom and the positioning slot and the four projections on the lid. *See* claim 1. Additionally:   Bottom Projection and Four Sidewalls

positioning slot and the four projections on the lid;	 Tool Box Hinged Lid for Interior Access

	 Positioning Slot on Hinged Lid



Four Projections on Tool Box Lid

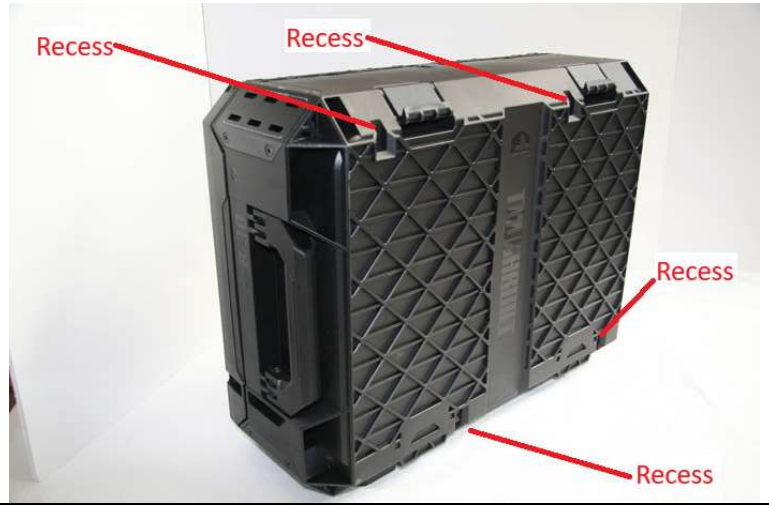


Projection Closeup

	 Four Positioning Recesses on Tool Box Bottom
[14b] wherein the four projections on the lid project upward from a top face of the lid, and the four positioning recesses of the bottom are located in a bottom face.	The four projections on the lid project upward from a top face of the lid, and the four positioning recesses of the bottom are located in a bottom face. The four projections on the lid project upward as shown in the following photograph.



The four positioning recesses of the bottom are located in a bottom face, as shown below.



Infringement Claim Chart Showing Infringement of U.S. Patent 11,986,946 by the ToughBuilt StackTech 21-in Black Plastic/Metal Tool Box (Model Number TB-B1-B-30, the "Tool Box") Used With the ToughBuilt StackTech 11-Compartment Large Plastic Small Parts Organizer (Model Number TB-B1-O-30, the "Organizer")

Claim Language	Elements in the Tool Box Used With the Organizer[1]
Claim 1[2]	
[1a] A storage box comprising:	The Tool Box is a storage box. For example: The Tool Box includes an interior storge compartment adapted to store items in dividers and bins. ToughBuilt describes these accused products as tool boxes, organizers, and chest coolers. The following images were obtained from ToughBuilt's website for the Tool Box:

[1] As set forth in the Complaint, Meridian International, Co., Ltd. alleges that the following products infringe U.S. Patent 11,986,946: TOUGHBUILT STACKTECH 22.3-in W x 26-in H Black Plastic/Metal Wheels Tool Box (Model TB-B1-B-70R); TOUGHBUILT STACKTECH XL 21-in W x 15.6-in H Black Plastic/Metal Tool Box (Model TB-B1-B-70); TOUGHBUILT STACKTECH Large 21-in W x 11.7-in H Black Plastic/Metal Tool Box (Model TB-B1-B- 50); TOUGHBUILT STACKTECH 21-in Black Plastic/Metal Tool Box (Model TB-B1-B-30); TOUGHBUILT STACKTECH Crate 21-in W x 11.4-in H Black Plastic/Metal Tool Box (Model TB-B1-X-50); TOUGHBUILT STACKTECH Compact 10.4-in Black Plastic/Metal Tool Box (Model TB-B1-B-60C); TOUGHBUILT STACKTECH 11-Compartment Large Plastic Small Parts Organizer (Model TB-B1-O-30); TOUGHBUILT 22-Compartment STACKTECH Low-Profile Plastic Small Parts Organizer (Model TB-B1-O-10); TOUGHBUILT 12-Compartment STACKTECH Compact Low-Profile Plastic Small Parts Organizer (Model TB-B1-O-10C); TOUGHBUILT STACKTECH XL 21-in W x 15.6-in H Ball-bearing 3-Drawer Black Plastic/Metal Tool Box (Model TB-B1- D-70-3); TOUGHBUILT STACKTECH 21-in W x 8.8-in H Ball-bearing 1-Drawer Black Plastic/Metal Tool Box (Model TB-B1-D-30-1); TOUGHBUILT STACKTECH XL White 38-Quart Insulated Chest Cooler (Model TB-B1-C-70); and TOUGHBUILT STACKTECH Compact White 16-Quart Insulated Chest Cooler (Model TB-B1-C-60C). Each of these products purports to feature the "StackTech" modular technology and infringe for the same reasons as the Tool Box analyzed in these charts, excepts as otherwise noted. Indirect infringement of each of the above-identified accused products occurs when the product is considered to be the "another storage box" in claim 1 and claims depending therefrom. A representative example of how such infringement occurs in shown in the following claim charts.

[2] Meridian does not assert that the TOUGHBUILT STACKTECH 22.3-in W x 26-in H Black Plastic/Metal Wheels Tool Box (Model TB-B1-B-70R) directly infringes as the "storage box" in claim 1.



(Image taken from https://toughbuilt.com/product/tb-b1-b-30-4xajl, last visited August 13, 2024.)

	 (Image taken from https://toughbuilt.com/product/tb-b1-b-30-4xajl, last visited August 13, 2024.)
[1b] a first connection part disposed on one area of said storage box connectable to a second connection part of another storage box;	The Tool Box includes a first connection part disposed on one area of said storage box connectable to a second connection part of another storage box. When the Tool Box is used with the Organizer, the Organizer is the "another storage box." For example: The Tool Box includes a first connection part comprising a mounting body, a locking buckle, and a resilient member, with a slide switch disposed on the front face of the box, near the bottom surface (i.e., one area of the storage box), as shown in part in the circled portion of the following image:

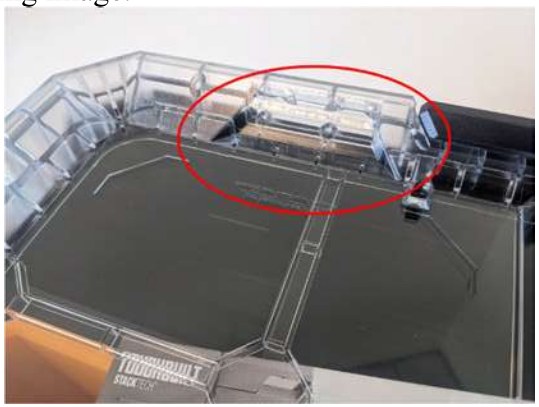
	 As set forth in greater detail below in regard to element [1c], this first connection part includes additional components located behind the exterior panel. The Organizer is another storage box:



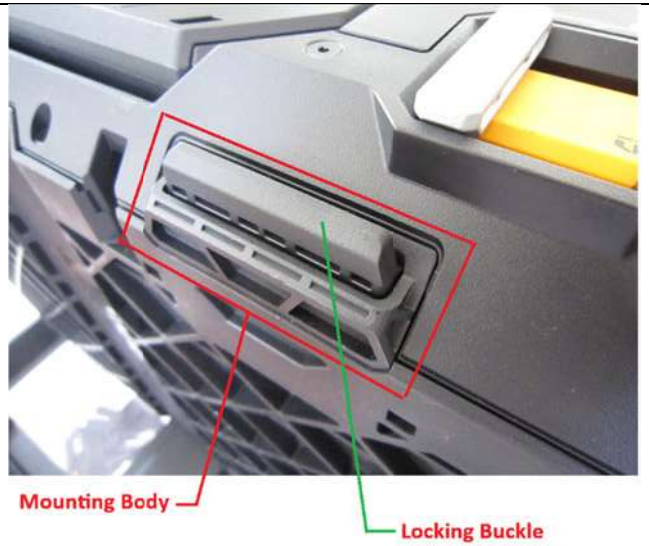
(Image taken from https://toughbuilt.com/product/tb-b1-o-30, last visited August 13, 2024.)

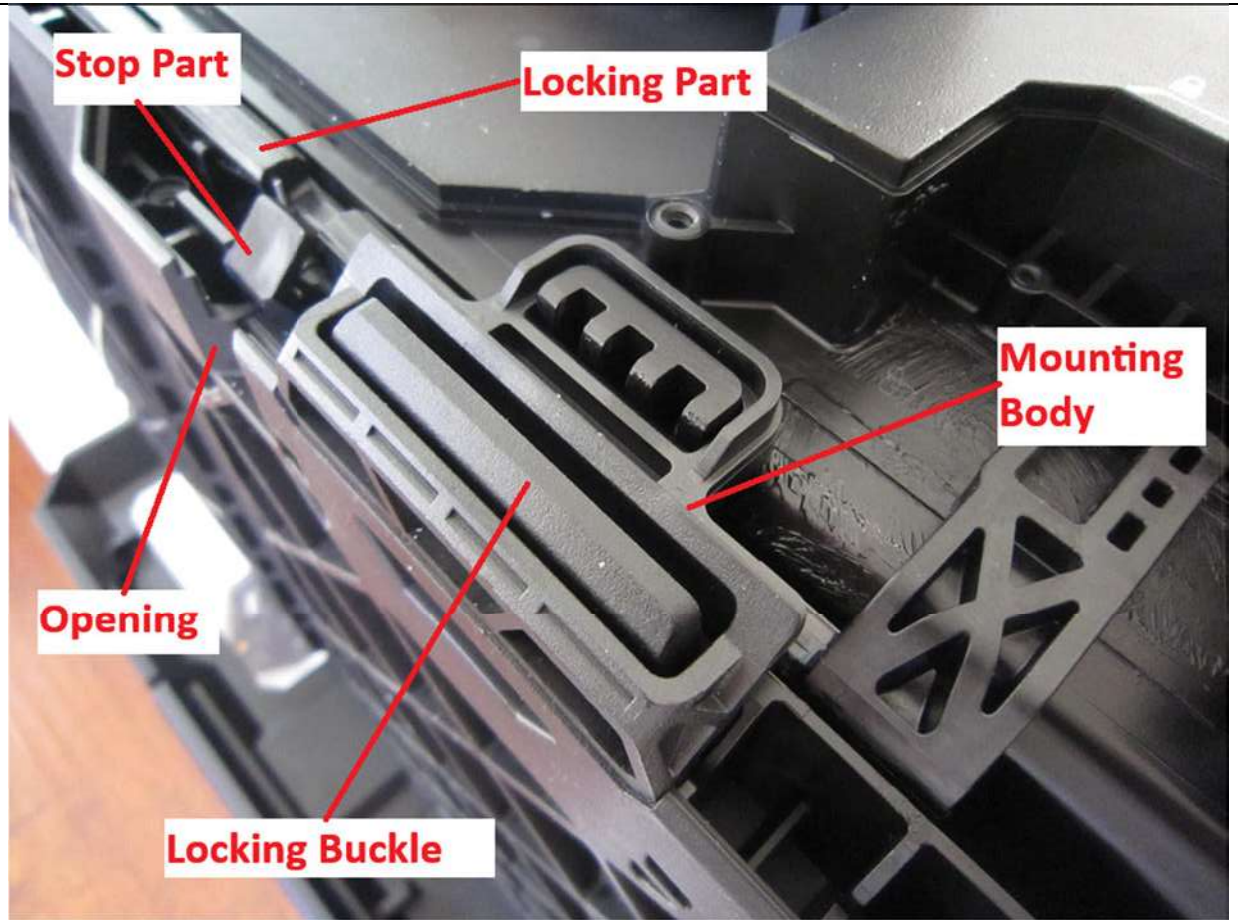


(Image taken from https://toughbuilt.com/product/tb-b1-o-30, last visited August 13, 2024.)

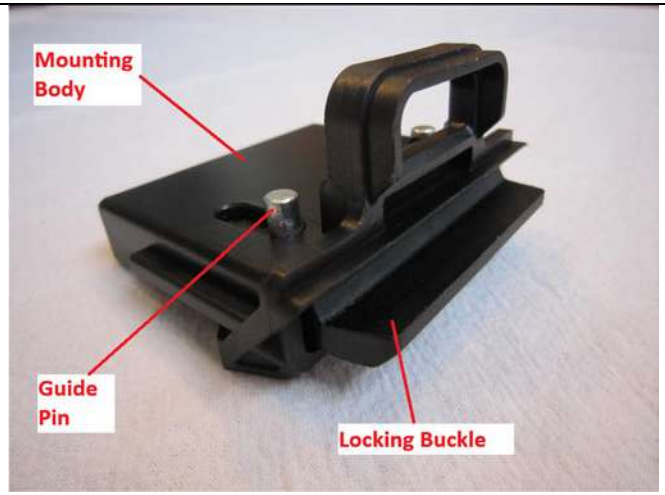
	The lid of the Organizer includes a second connection part disposed near an outer edge of the lid on the top surface of the second storage box. This second connection part defines a recessed area, as shown in the circled portion of the following image.  The first connection part on the Tool Box is connectable to the second connection part on the Organizer.  (Image taken from https://toughbuilt.com/product/tb-b1-b-30-4xajl, last visited August 13, 2024.)

	 (Image taken from https://toughbuilt.com/product/tb-b1-b-30-4xajl, last visited August 13, 2024.)
[1c] wherein, said first connection part comprises a mounting body, a locking buckle movable with respect to said mounting body, and a first resilient member located between said mounting body and said locking buckle, wherein said first resilient member keeping said locking buckle automatically in a locked state;	The first connection part of the Tool Box comprises a mounting body, a locking buckle movable with respect to said mounting body, and a first resilient member located between said mounting body and said locking buckle, wherein said first resilient member keeping said locking buckle automatically in a locked state. For example: The first connection part on the Tool Box includes a mounting body in which a locking buckle moves between a retracted (negative z direction) and extended (positive z direction) position.

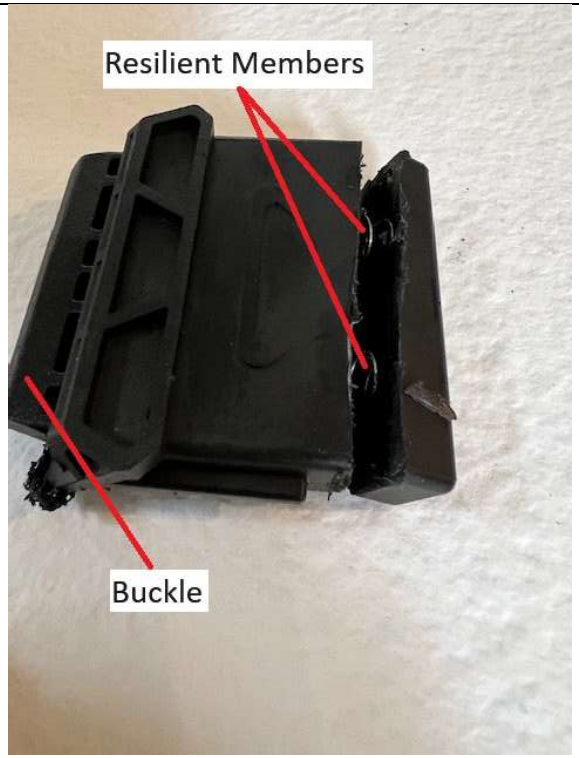
	  When an external cover component is removed, additional portions of the mounting body are shown.



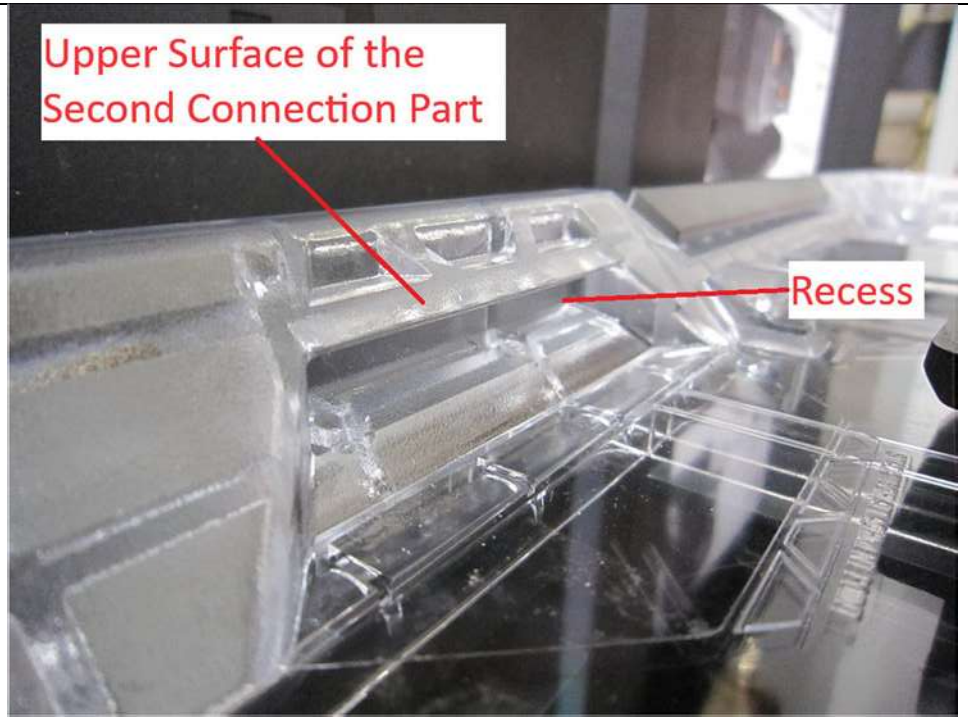
Additional portions of the mounting body are seen when that component is removed from the Tool Box.

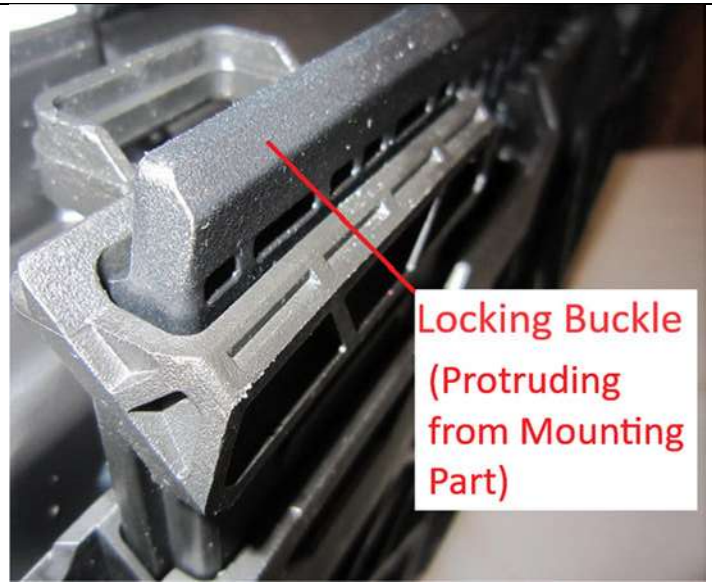
	  The locking buckle moves inward and outward relative to the front of the mounting body. That is, the locking buckle is movable with respect to said mounting body, and specifically moves between an extended (positive z direction) position (for a locked state) and a retracted (negative z direction) position (for an unlocked state), as shown below.

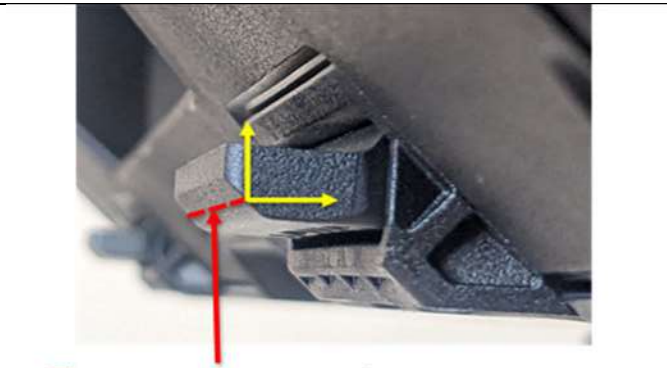
	  Locking Buckle Extended Locking Buckle Retracted The mounting body further includes a first resilient member, which is located between the locking buckle and a rear portion of the mounting body, as shown in the following image.

	 The first resilient member applies a force on the locking buckle, which biases the locking buckle forward (in the positive z direction) to engage with the second connection part of the Organizer).

	 
[1d] wherein, said second connection part of the other storage box comprises a mating part interlockable with the locking buckle,	The second connection part of the other storage box (i.e., the Organizer) comprises a mating part interlockable with the locking buckle. For example: The second connection part, located on the lid of the Organizer, defines a recess that serves as a mating part that is interlockable with the locking buckle of the Tool Box. See the image below. If the locking buckle of the first connection part is already extended in the positive z direction when the Tool Box is being placed on the Organizer, the upper surface of the second connection part interfaces with the locking buckle to force the locking buckle to retract against its spring bias until such time as it is aligned with, and free to enter, the recess of the second connection part.

	
[1e] wherein the locking buckle is configured to slide inward with respect to the mounting part so that the locking buckle is automatically lockable with the mating part of the other storage box by action of said first resilient	The locking buckle of the Tool Box is configured to slide inward (i.e., in the negative z direction) with respect to the mounting part so that the locking buckle is automatically lockable with the mating part of the other storage box (i.e., the Organizer) by action of said first resilient member when the locking buckle is aligned with the mating part of the other storage box. For example:

member when the locking buckle is aligned with the mating part of the other storage box;	 As one example, if the locking buckle is extended in the positive z direction when the Tool Box is placed atop the Organizer, the locking buckle comes into contact with the second connection part. Given the geometrical design of the locking buckle and the second connection part, when the second connection part engages the locking buckle, a force with a vertical upward component and a horizontal inward component is applied to the locking buckle, causing the locking buckle to retract inward with respect to the mounting part.

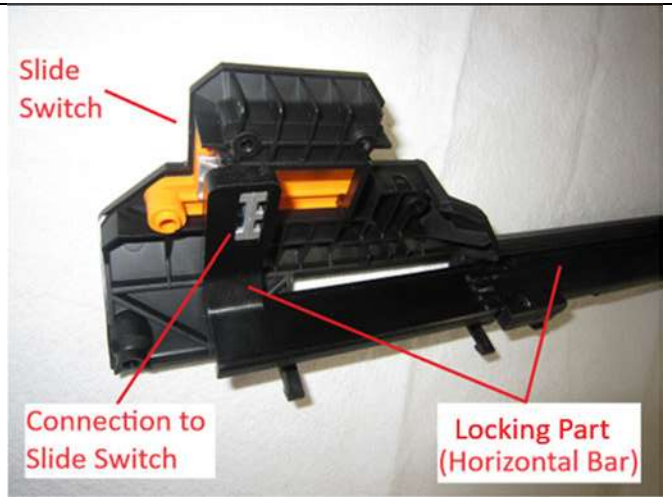
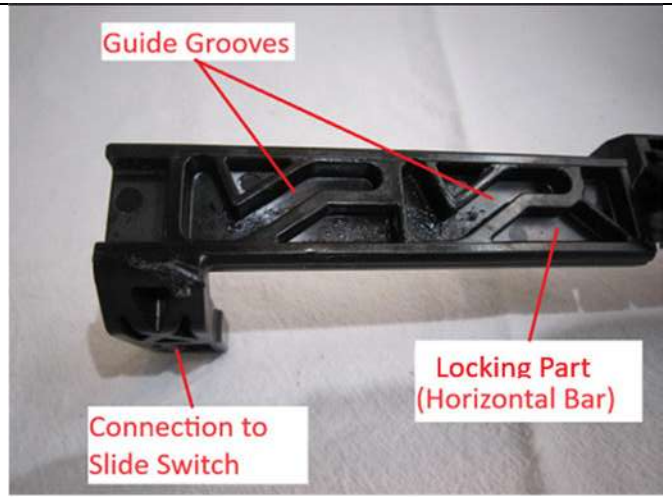
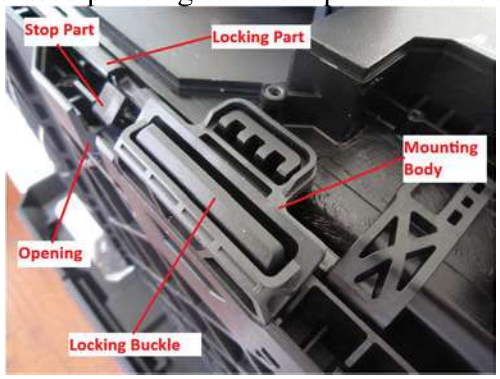


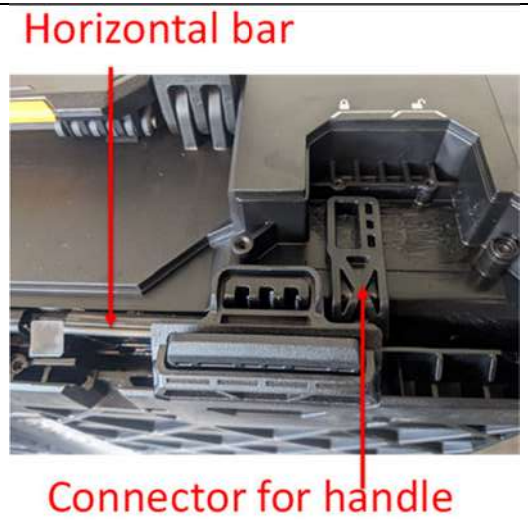
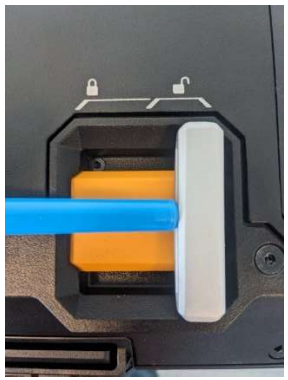
As this is happening, the first resilient member continues to bias the locking buckle forward in the positive z direction though this force is less than the inward-directed force caused by the interaction between the locking buckle and an upper surface of the second connection part. As the Tool Box is lowered onto the Organizer, the locking buckle comes into alignment with and is driven into the recess of the second connection part due to the bias of the first resilient member. As a result, the locking buckle is automatically lockable with the mating part.

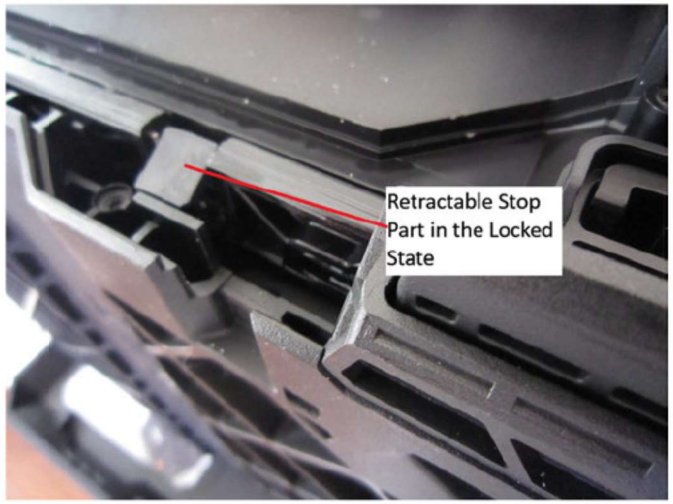
Another way in which the locking buckle is automatically lockable with the mating part of the Organizer is when it is moved inward, and retained in a retracted position within the mounting body as a result of the slide switch being moved to the unlocked position. Here, manual movement of the sliding switch moves the locking part (cleat locking cam) which drives the guide grooves (cam slots) in a manner that causes the guide pin (cam follower pins) to move the locking buckle (cleat) from a locked position to an unlocked position. After the locking buckle is retracted with respect to the mounting body, the locking buckle is automatically lockable by the bias of the first resilient member when the locking buckle is

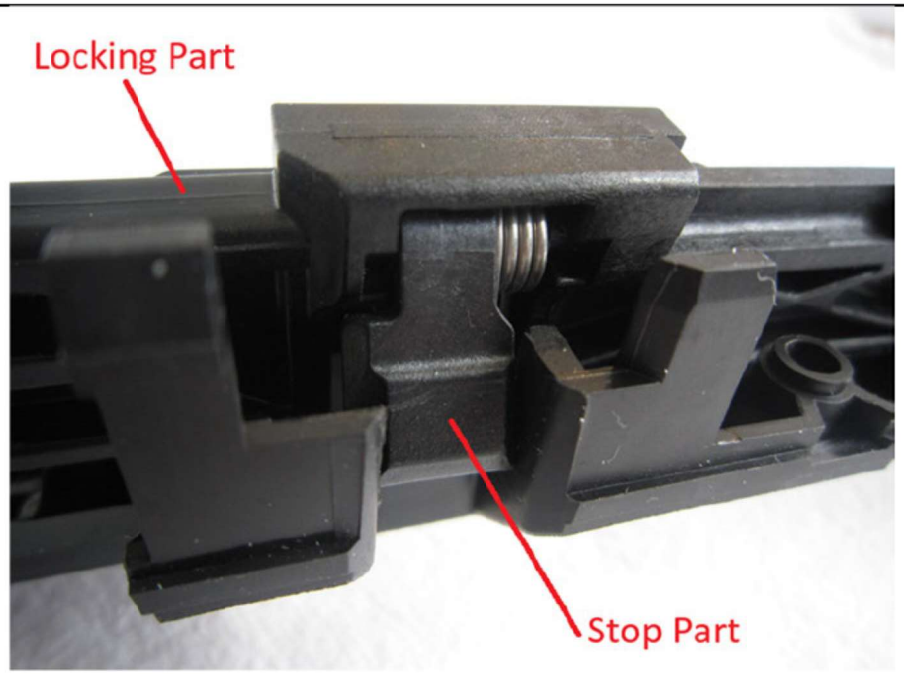
	aligned with the mating part of the other storage box. This automatic locking occurs when the stop part contacts a protrusion on the Organizer.
[1f] a locking part cooperating with the locking buckle, wherein manual movement of the locking part causes the locking buckle to move to an unlocked state; and	The Tool Box includes a locking part cooperating with the locking buckle, wherein manual movement of the locking part causes the locking buckle to move to an unlocked state. For example: The Tool Box includes a locking part cooperating with the locking buckle. The locking buckle includes guide pins that interface with guide grooves in the locking part such that horizontal movement of the locking part causes the locking buckle to either extend in the positive z direction or retract in the negative z direction. The locking part is connected to the slide switch so that the locking part may be manually moved to an unlocked position as a result of the slide switch being manually moved from the locked position (as indicated by an image of a closed padlock) to the unlocked position (as indicated by an image of an open padlock).  Locked Position  Unlocked Position As the slide switch is moved from the locked position to the unlocked position, the guide grooves in the locking part cause the locking buckle to move in the negative z direction from an extended position to a retracted unlocked position. These positions are shown in the images below.

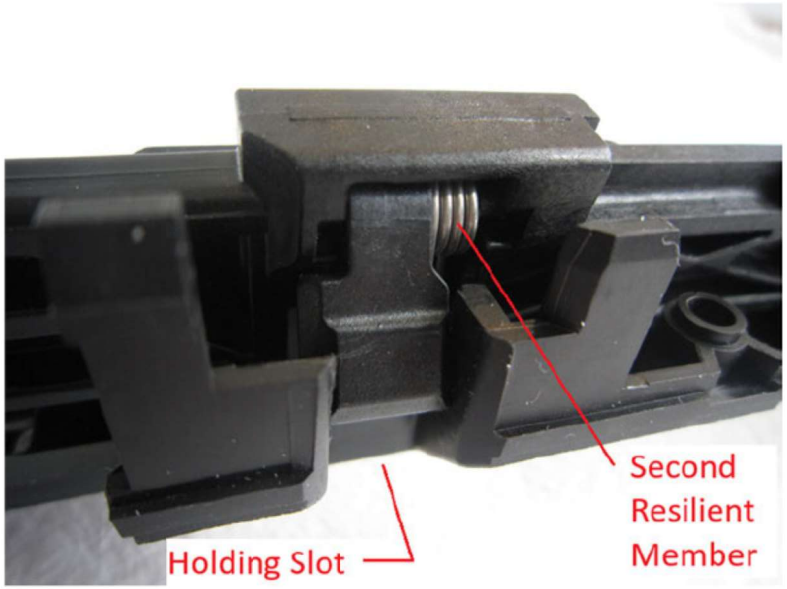
	 Locking buckle extended (locked state)  Locking buckle retracted (unlocked state) Manual movement of the slide switch to the right causes the locking part (horizontal bar) to move to the right (in the positive x direction) from the leftmost locked (compressed) position. As the locking part moves, guide grooves in the locking part interact with guide pins coupled to the locking buckle to cause the locking buckle to move in the negative z direction from a locked position to a unlocked position within the mounting body. Refer to locking buckle images in claim element [1c] above.

	 
[1g] a stop part, wherein when the stop part projects outward with respect to a locking path of the locking part, said locking part is not automatically lockable and said first connection part is in a state of remaining unlocked from said second connection part, wherein the stop part is retractable. Said stop part being extended when said	The Tool Box includes a stop part, wherein when the stop part projects outward with respect to a locking path of the locking part, said locking part is not automatically lockable and said first connection part is in a state of remaining unlocked from said second connection part. The stop part comprises a spring-biased pivoting catch coupled to the locking part. 

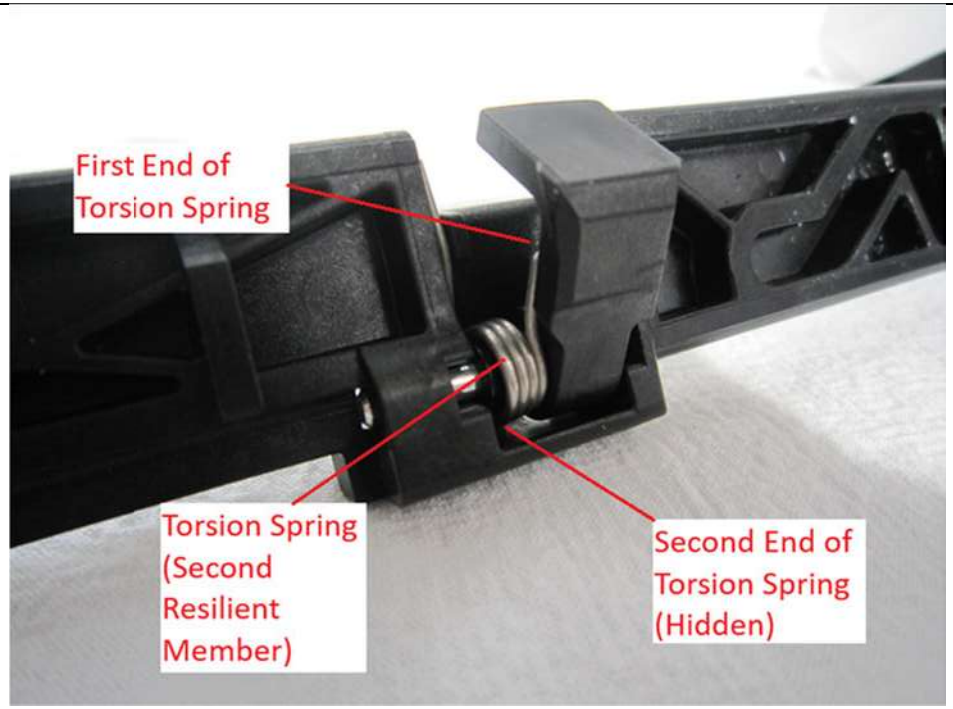
first connection part is in a holding unlocked state with said second connection part of the other storage box, and said stop part being compressed when said first connection part is in a locked state with said second connection part.	 In addition to having the locked and unlocked positions discussed above, the slide switch has an override position that is underneath the image of an unlocked padlock (as is the unlock position discussed above).  Slide Switch in the Override Position The stop part component is retractable and is extended when in the holding unlocked and unlocked state and is compressed when in the locked state.

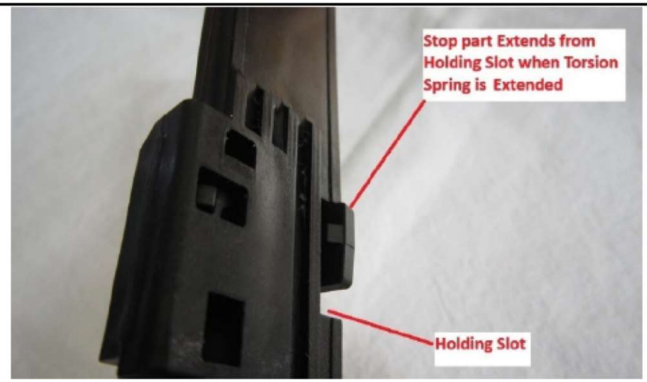
	  When the system is in an override configuration, the stop part is extended in a negative y direction (i.e., down and outward in relation to the path of the locking buckle along the z-axis). The locking part (horizontal bar) is extended in the positive x direction, and the locking buckle is retracted in the negative z direction to render the system not automatically lockable. When transitioning to this override configuration, the portion of the locking part's guide grooves in contact with the guide pins causes the locking buckle to move along the locking path in a negative z direction (e.g., closer to the center of the storage box) to position the locking buckle in the retracted (negative z direction) position, against the bias of the first resilient member.
Claim 2	
[2a] The storage box of claim 1, wherein said stop part is provided on said locking part and is movable with said	As discussed above, the Tool Box satisfies all the limitations of claim 1. The Tool Box includes a stop part that is provided on the locking part and is movable with the locking part along the locking path of the locking part. See claim 1. Additionally:

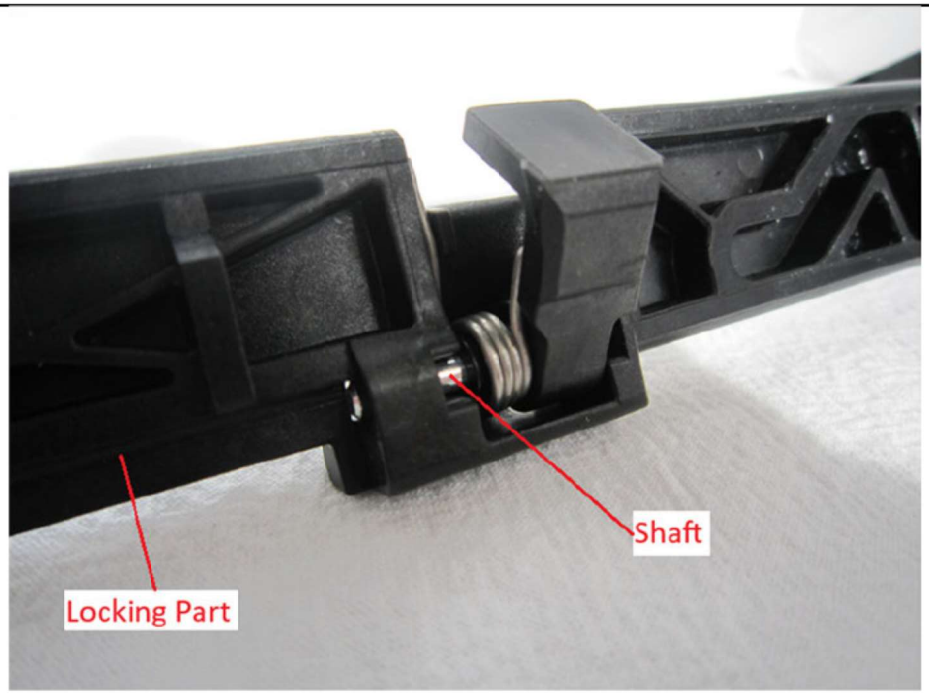
locking part along the locking path of the locking part.	 Stop Part Provided on Locking Part The stop part is coupled to the locking part, such that as the locking part moves along the locking path, the stop part also moves along the locking path.
Claim 3	
[3a] The storage box of claim 2, wherein said locking part comprises a holding slot opened on the locking part, and further comprising a	As discussed above, the Tool Box satisfies all the limitations of claim 2. The Tool Box's locking part comprises a holding slot opened on the locking part, and further comprises a second resilient member combined between the holding slot and the stop part to extend the stop part outward in an extended state. The Tool Box's stop part is accommodated within said holding slot in a compressed state.

second resilient member combined between the holding slot and the stop part to extend the stop part outward in an extended state and said stop part is accommodated within said holding slot in a compressed state.	See claim 2. Additionally:  Holding Slot and Second Resilient Member The second resilient member is positioned between the stop part and the holding slot (which is part of the locking part). The second resilient member is configured to bias the stop part outward from the holding slot into an extended position.
Claim 4	
[4a] The storage box of claim 3, wherein when the stop part is retractably provided in said holding slot, said	As discussed above, the Tool Box satisfies all the limitations of claim 3. When the Tool Box's stop part is retractably provided in the holding slot, said second resilient member is compressed by a protrusion on the lid of the second storage box. See claim 3. Additionally:

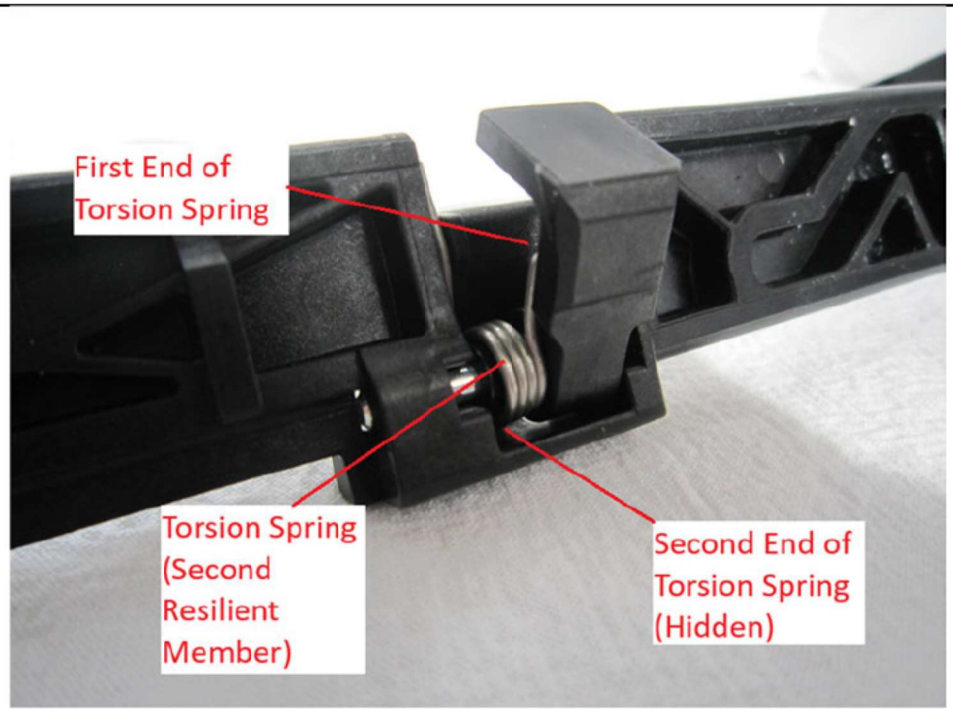
second resilient member is compressed;	When the stop part is moved toward the holding slot of the locking part, the second resilient member becomes compressed. This configuration occurs when the locking part is in the leftmost (negative x) leftmost position and the locking buckle is extended in the positive z direction.
[4b] when said stop part is biased outward and held against a mating portion, said locking buckle is not automatically lockable to the mating part of the other storage box.	When the Tool Box's stop part is biased outward and held against a mating portion, the locking buckle is not automatically lockable to the mating part of the other storage box. For example, after the Tool Box is stacked onto the Organizer, the slide switch may be moved to the holding unlocked position. Releasing the slide switch causes the locking part and biased outward stop part to move under spring bias to the left (negative x direction) until the stop part comes into mating abutment with a protrusion on the Organizer, at which point the locking buckle is not automatically lockable to the mating part of the Organizer.
Claim 5	
[5a] The storage box of claim 4, wherein said second resilient member is a torsion spring with one end against said stop part and the other end against a bottom of said holding slot;	As discussed above, the Tool Box satisfies all the limitations of claim 4. The Tool Box's second resilient member is a torsion spring with one end against said stop part and the other end against a bottom of the holding slot. See claim 4. Additionally:

	
[5b] when said torsion spring is extended, said stop part extends out of said holding slot and when said torsion spring is compressed, said stop part is retracted into said holding slot.	The torsion spring biases the stop part to extend out of the holding slot. When compressed, the stop part is retracted into the holding slot, as shown in the photograph below.

	 
Claim 6	
[6a] The storage box of claim 5, and further comprising a shaft connected to said locking part about which said stop part rotates, said shaft being fixed to said locking part;	As discussed above, the Tool Box satisfies all the limitations of claim 5. The Tool Box further comprises a shaft connected to the locking part about which the stop part rotates, the shaft being fixed to the locking part. See claim 5. Additionally:

	
[6b] wherein the torsion spring being positioned on said shaft.	The Tool Box's torsion spring is positioned on the shaft. As seen in element [6a] above, the torsion spring is positioned on the shaft.
Claim 9	
[9a] The storage box of claim 1, wherein two adjacent storage boxes are interlockable with each other by means of the first connection part	As discussed above, the Tool Box satisfies all the limitations of claim 1. The Tool Box is interlockable with an adjacent storage box by means of the first connection part of the Tool Box and the second connection part of the other storage box. See claim 1. Additionally:

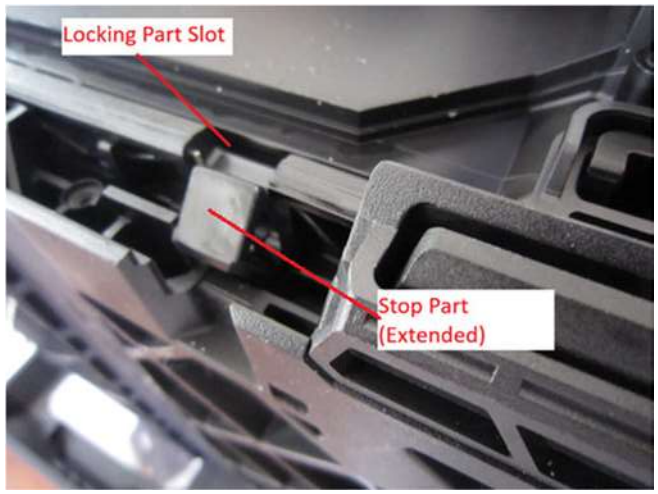
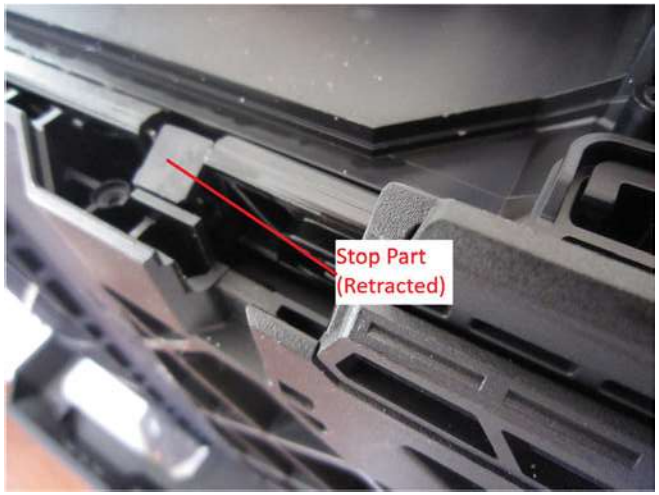
and the second connection part of the other storage box.	As set forth in claim 1, two storge boxes (i.e., the "storage box" and the "other storage box") are interlockable with each other when the storage box is positioned atop the other storage box.
Claim 10	
[10a] The storage box of claim 1, and further comprising a second resilient member, and wherein the locking part comprises of a slot, and wherein the stop part is biased outward from the slot by the second resilient member.	As discussed above, the Tool Box satisfies all the limitations of claim 1. The Tool Box comprises a second resilient member, and the locking part comprises of a slot, wherein the stop part is biased outward from the slot by the second resilient member. See claims 1-6. Additionally: The second resilient member is the torsion spring that biases the stop part to extend outward from the slot.

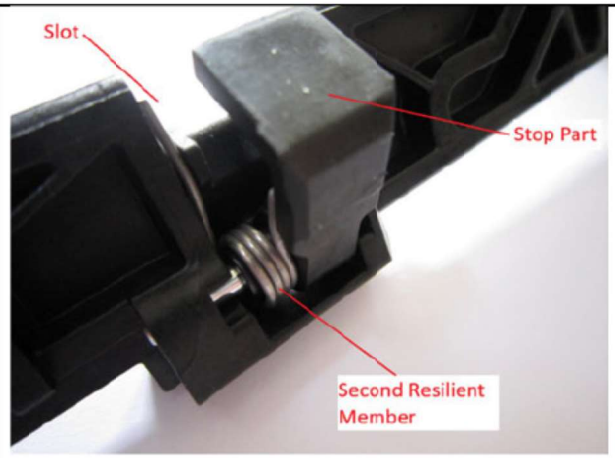
	
Claim 11[3]	
[11a] A storage box comprising:	*See, supra,* element [1a].
[11b] a first connection part disposed on one area of said storage box connectable to a second	*See, supra,* element [1b].

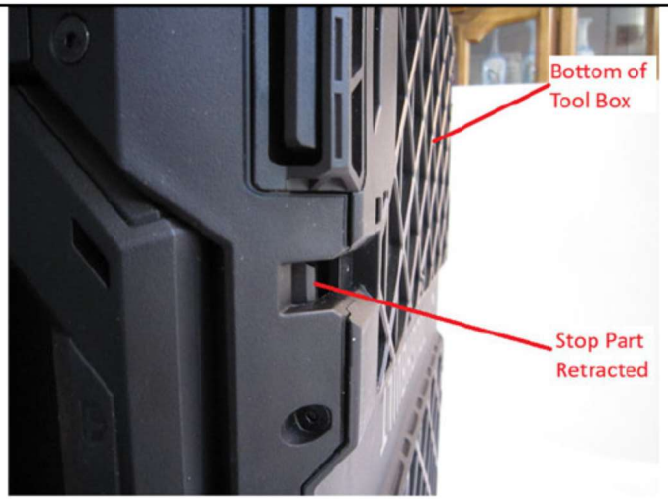
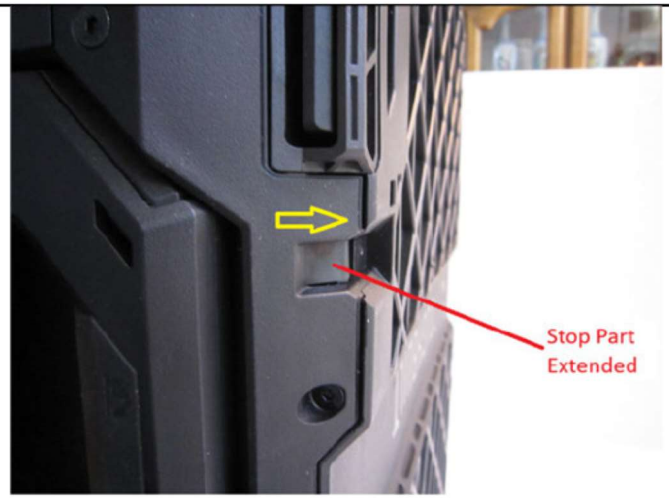
[3] Meridian does not assert that the TOUGHBUILT STACKTECH 22.3-in W x 26-in H Black Plastic/Metal Wheels Tool Box (Model TB-B1-B-70R) directly infringes as the "storage box" in claim 11.

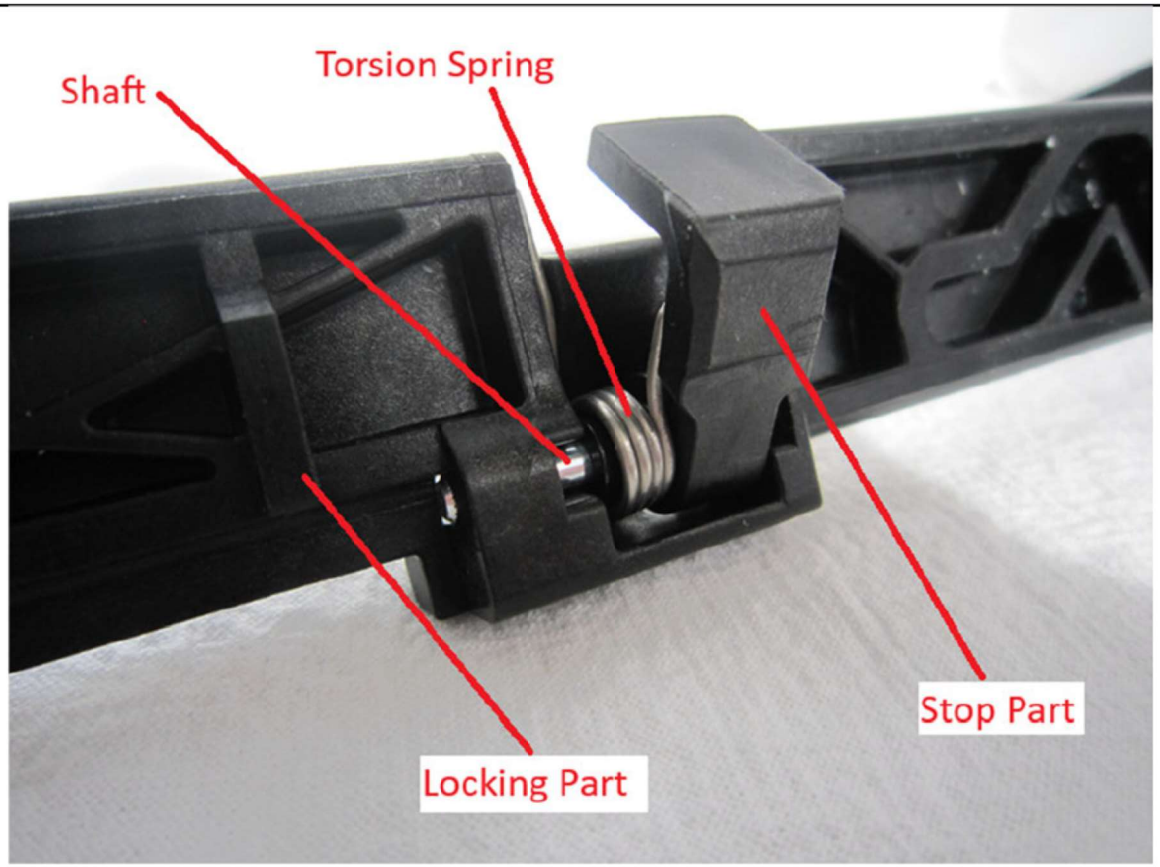
connection part of another storage box;	
[11c] wherein, said first connection part comprises a mounting body, a locking buckle movable with respect to said mounting body, and a first resilient member located between said mounting body and said locking buckle, wherein said first resilient member keeping said locking buckle automatically in a locked state;	*See, supra,* element [1c].
[11d] wherein, said second connection part of the other storage box comprises a mating part interlockable with the locking buckle;	*See, supra,* element [1d].
[11e] wherein the locking buckle is configured to slide inward with respect to the mounting part so that the locking buckle is automatically lockable with the	*See, supra,* element [1e].

mating part of the other storage box by action of said first resilient member when the locking buckle is aligned with the mating part of the other storage box;	
[11f] a locking part cooperating with the locking buckle, wherein manual movement of the locking part causes the locking buckle to move to an unlocked state; and	*See, supra,* element [1f].
[11g] a stop part, wherein when the stop part projects outward with respect to a locking path of the locking part, said locking part is not automatically lockable and said first connection part is in a state of remaining unlocked from said second connection part;	*See, supra,* element [1g].

[11h] a second resilient member, and wherein the locking part comprises of a slot, and wherein the stop part is biased outward from the slot by the second resilient member, wherein the stop part moves perpendicular with respect to a sliding path of the locking part.	The Tool Box includes a second resilient member, wherein the locking part comprises of a slot, and wherein the stop part is biased outward from the slot by the second resilient member, wherein the stop part moves perpendicular with respect to a sliding path of the locking part. For example: See claims 1 and 3-5. Additionally: The stop part is biased outward by a torsion spring in the slot of the locking part, and moves (in the y direction) in a direction perpendicular to the sliding path of the locking part (along the x direction) as shown in the following images.  

	
Claim 12	
[12a] The storage box of claim 11, wherein the stop part moves outward relative to the locking part.	As discussed above, the Tool Box satisfies all the limitations of claim 11. The Tool Box's stop part moves outward relative to the locking part. The stop part is biased outwardly by the second resilient member (a torsion spring) When aligned with the slot the resilient member forces the stop part to pivot outwardly relative to the locking part, moving closer to the bottom of the Tool Box as shown below. See claims 11, 3 and 4. Additionally:

	 
Claim 13	
[13a] The storage box of claim 11, wherein the second resilient member is a torsion spring and the stop part rotates relative to the locking part.	As discussed above, the Tool Box satisfies all the limitations of claim 11. The Tool Box's second resilient member is a torsion spring, and the stop part rotates relative to the locking part. The stop part is connected to the locking part with a shaft and biased by a torsion spring, as shown below. See claims 11 and 5. Additionally:



Claim 14[4]

[4] Meridian does not accuse the TOUGHBUILT STACKTECH Crate 21-in W x 11.4-in H Black Plastic/Metal Tool Box (Model TB-B1-X-50), the TOUGHBUILT STACKTECH Compact 10.4-in Black Plastic/Metal Tool Box (Model TB-B1-B-60C), the TOUGHBUILT 12-Compartment STACKTECH Compact Low-Profile Plastic Small Parts Organizer (Model TB-B1-O-10C), or the TOUGHBUILT STACKTECH Compact White 16-Quart Insulated Chest Cooler (Model TB-B1-C-60C) of infringing claim 14.

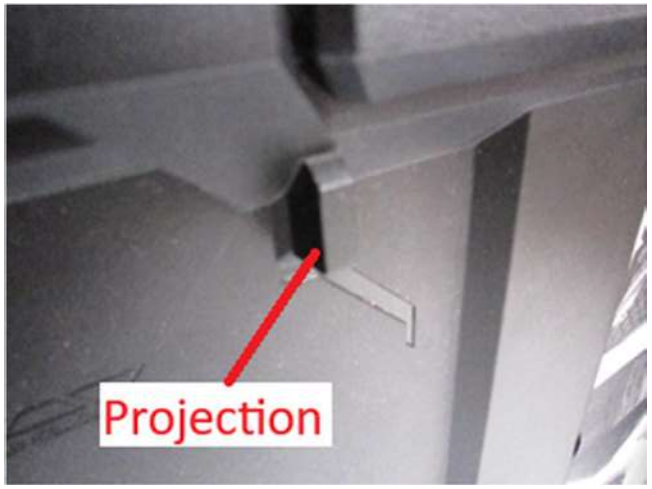
[14a] The storage box of claim 1, further comprising a bottom comprising a projection, four sidewalls projecting from the bottom, a hinged lid to access an interior, and a positioning slot on the hinged lid, wherein two adjacent said storage boxes are located with respect to each other by the projection of the bottom and the positioning slot on the lid, wherein the lid comprises four projections and the bottom comprises four positioning recesses, wherein two adjacent said storage boxes are located with respect to each other by the projection and the four positioning recesses on the bottom and the positioning slot and the	As discussed above, the Tool Box satisfies all the limitations of claim 1. The Tool Box further comprises a bottom comprising a projection, four sidewalls projecting from the bottom, a hinged lid to access an interior, and a positioning slot on the hinged lid, wherein two adjacent said storage boxes are located with respect to each other by the projection of the bottom and the positioning slot on the lid, wherein the lid comprises four projections and the bottom comprises four positioning recesses, wherein two adjacent said storage boxes are located with respect to each other by the projection and the four positioning recesses on the bottom and the positioning slot and the four projections on the lid. See claim 1. Additionally:   Bottom Projection and Four Sidewalls

four projections on the lid;	 Tool Box Hinged Lid for Interior Access

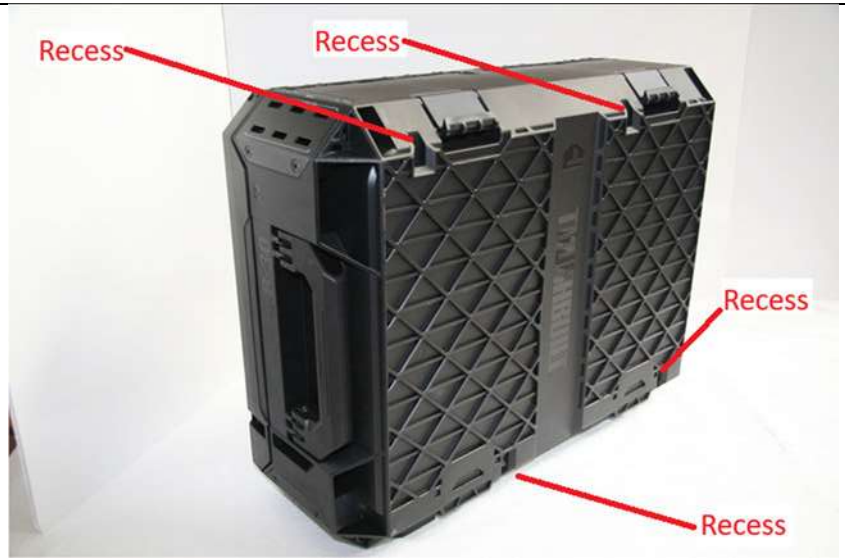
	 Positioning Slot on Hinged Lid



Four Projections on Tool Box Lid



Projection Closeup

	 Four Positioning Recesses on Tool Box Bottom
[14b] wherein the four projections on the lid project upward from a top face of the lid, and the four positioning recesses of the bottom are located in a bottom face.	The four projections on the lid project upward from a top face of the lid, and the four positioning recesses of the bottom are located in a bottom face. The four projections on the lid project upward as shown in the following photograph.



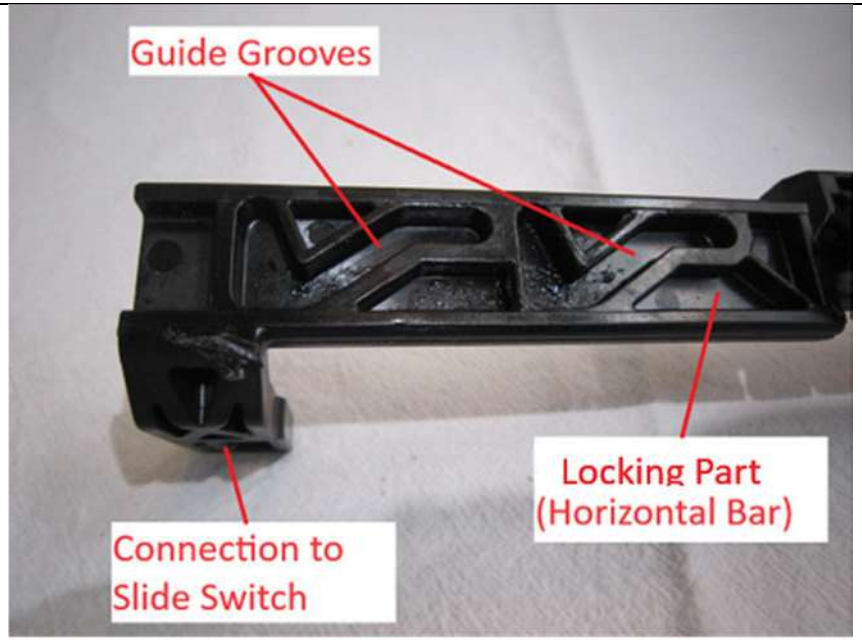
The four positioning recesses of the bottom are located in a bottom face, as shown below.



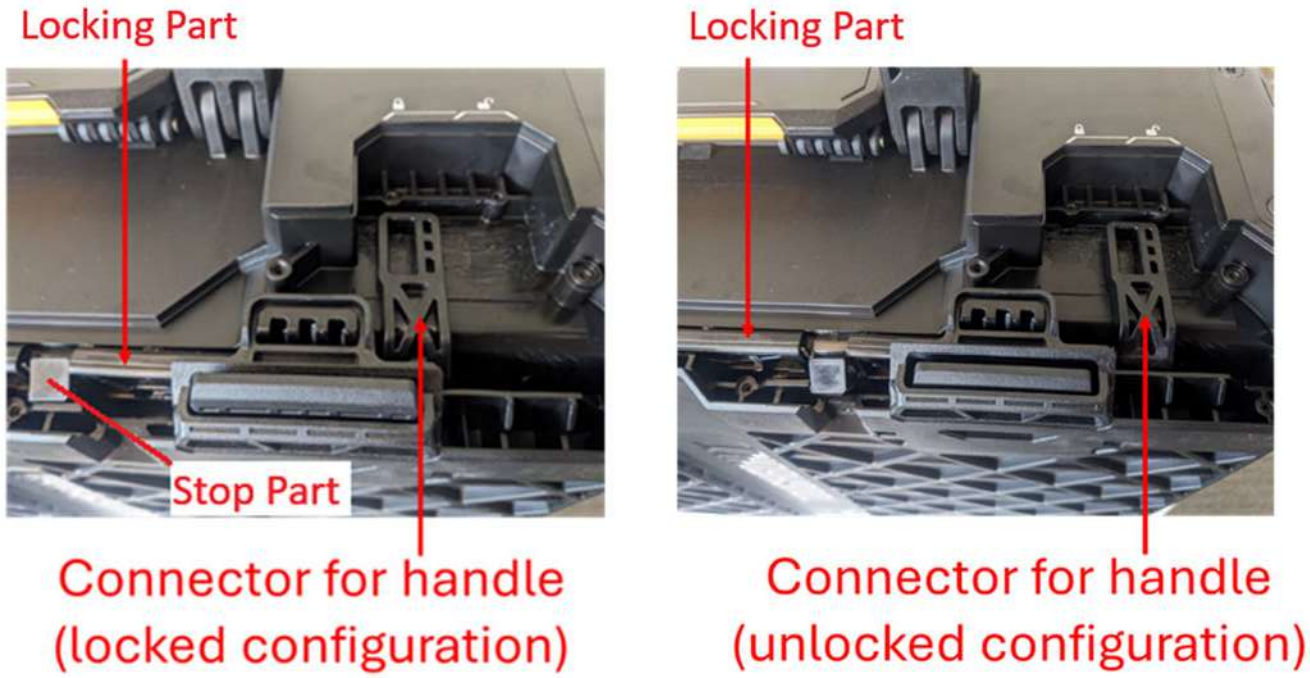
Claim 15[5]	
[15a] A storage box comprising:	*See, supra,* element [1a].
[15b] a first connection part disposed on one area of said storage box, wherein the first connection part comprises a mounting body, a locking buckle movable with respect to the mounting body, and a first resilient member located between the mounting body and the locking buckle to bias the locking buckle automatically outward in a locked state;	*See, supra,* elements [1b] and [1c].
[15c] a locking part configured to move along a horizontal locking path and to cooperate with the locking buckle, wherein manual	The Tool Box includes a locking part configured to move along a horizontal locking path and to cooperate with the locking buckle, wherein manual movement of the locking part along the horizontal locking path causes the locking buckle to move between an unlocked state retracted with respect to the mounting body and a locked state extended with respect to the mounting body. See elements [1f] and [1g]. Additionally:

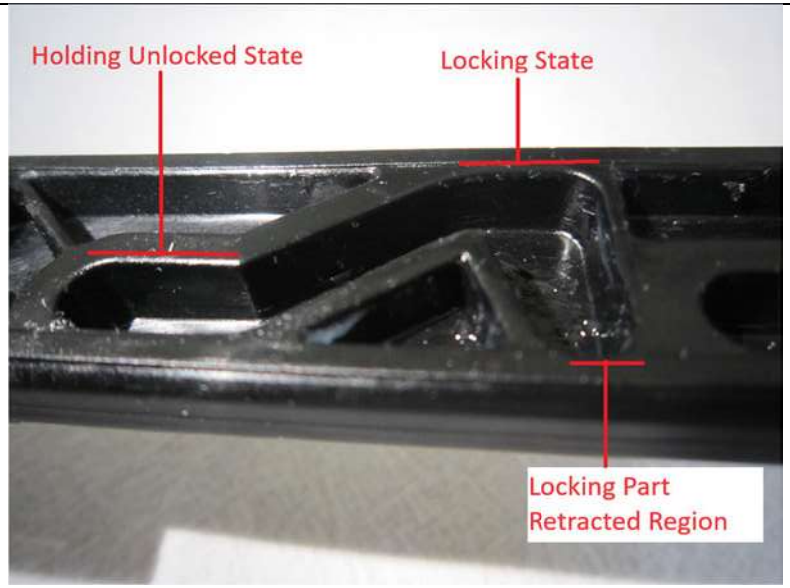
[5] Meridian does not assert that the TOUGHBUILT STACKTECH 22.3-in W x 26-in H Black Plastic/Metal Wheels Tool Box (Model TB-B1-B-70R) directly infringes as the "storage box" in claim 15.

movement of the locking part along the horizontal locking path causes the locking buckle to move between an unlocked state retracted with respect to the mounting body and a locked state extended with respect to the mounting body;	The Tool Box includes a locking part cooperating with the locking buckle. The locking buckle includes guide pins that interface with guide grooves in the locking part such that horizontal movement of the locking part along a horizontal locking path (x direction) causes the locking buckle to either extend in the positive z direction or retract in the negative z direction. The locking part is connected to the slide switch so that the locking part may be moved to an unlocked position as a result of the slide switch being manually moved from the locked position (as indicated by an image of a closed padlock) to the unlocked position (as indicated by an image of an open padlock).  Slide Switch Locked Position  Slide Switch Unlocked Position As the slide switch is manually moved from the locked position to the unlocked position, the guide grooves in the locking part cause the locking buckle to move in the negative z direction from an extended position to a retracted unlocked position. These positions are shown in the images below.

	 Guide Grooves Locking Part (Horizontal Bar) Connection to Slide Switch

	 
[15d] a stop part combined to the locking part comprising an unlocked state corresponding to the unlocked state of the locking buckle with the stop part extended from the locking part and the locking buckle held retracted with respect to the mounting body, and a locked state corresponding to the locked state of the	The Tool Box includes a stop part combined to the locking part comprising an unlocked state corresponding to the unlocked state of the locking buckle with the stop part extended from the locking part and the locking buckle held retracted with respect to the mounting body, and a locked state corresponding to the locked state of the locking buckle with the stop part retracted with respect to the locking part and the locking buckle held extended with respect to the mounting body. For example: See element [1g]. Additionally: The stop part comprises a spring-biased pivoting catch attached to the locking part (horizontal bar).

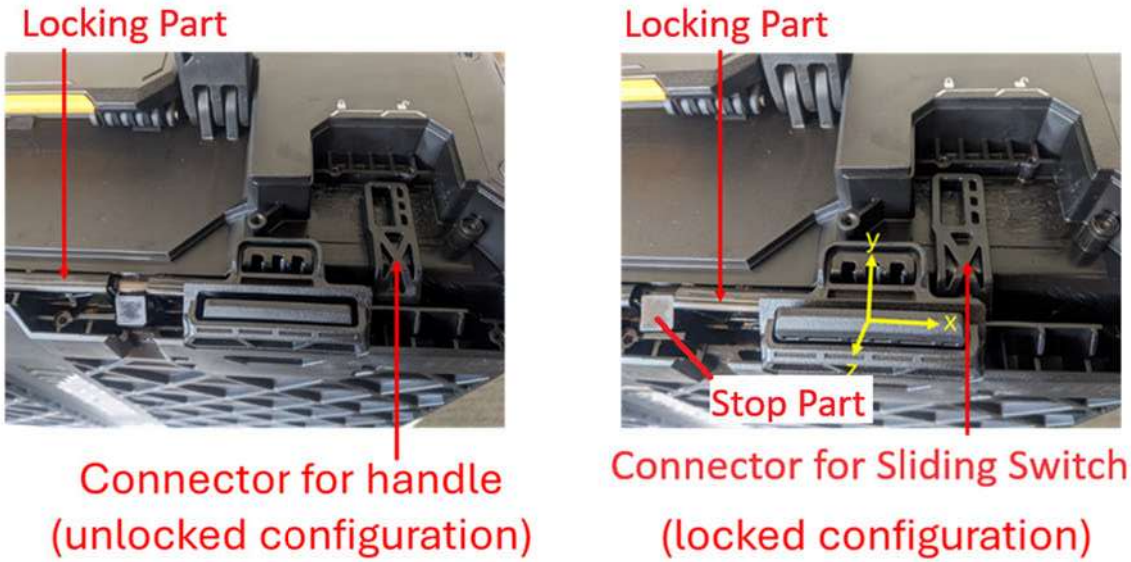
locking buckle with the stop part retracted with respect to the locking part and the locking buckle held extended with respect to the mounting body; and	



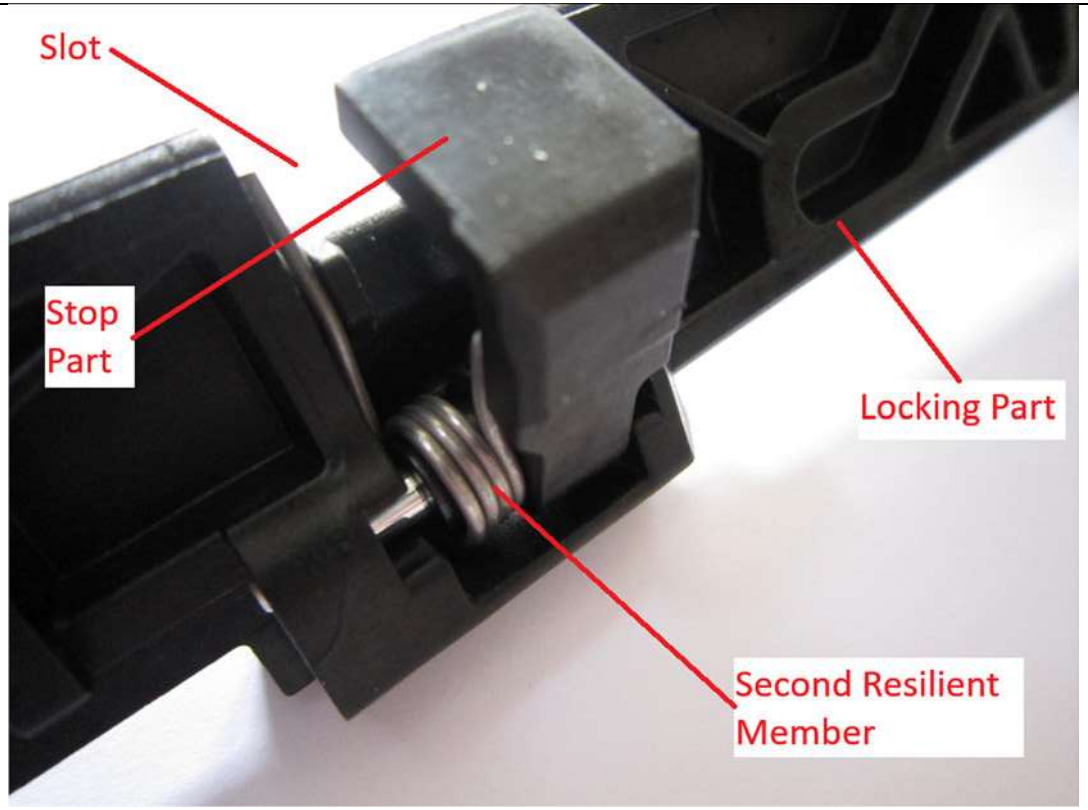
Guide Groove in Locking Part

Stop Surfaces (rearmost surfaces) of Guide Grooves

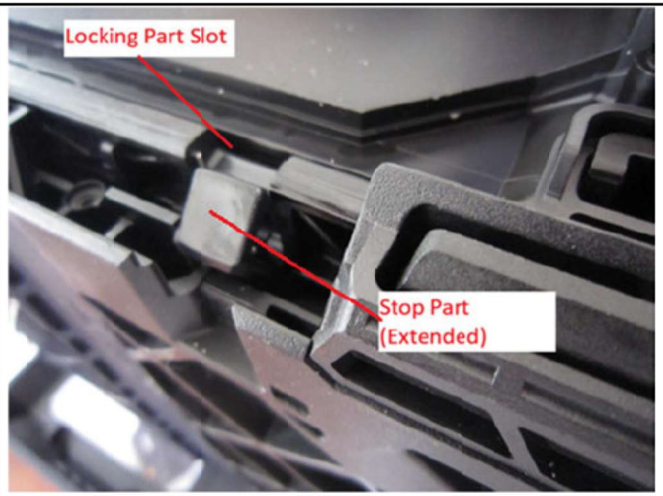
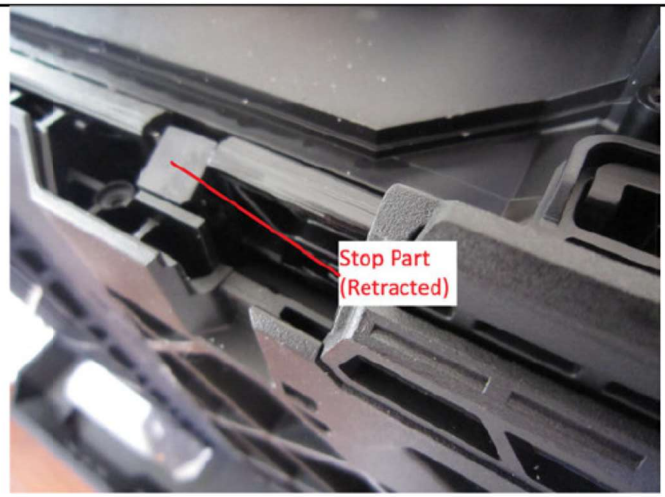
In the unlocked configuration, the stop part is aligned with the opening on the bottom of the Tool Box and held in this position by abutment with a portion of the Tool Box's housing surrounding the opening. When the system transitions from an unlocked configuration to a locked configuration (such as when the Tool Box is stacked onto and coupled with the Organizer), the stop part is moved in the positive y direction from its extended position to a compressed (retracted) position by the protrusion projecting into the opening in the Tool Box, allowing the locking part to which the stop part is attached to move under spring bias in the negative x direction. As the locking part moves in a negative x direction (i.e., from right to left), the guide grooves no longer restrain the locking buckle in the retracted unlocked position, as shown in the following images:

	
[15e] a second connection part disposed on another area of said storage box, wherein the second connection part comprises a mating part that corresponds to the locking buckle, wherein said locking part further comprises a holding slot opened on the locking part, and	The Tool Box includes a second connection part disposed on another area of said storage box, wherein the second connection part comprises a mating part that corresponds to the locking buckle, wherein said locking part further comprises a holding slot opened on the locking part, and further comprising a second resilient member combined between the holding slot and the stop part, wherein the stop part is extended from the slot in the locking part when the stop part is in the unlocked state, and wherein the stop part is retracted in the slot in the locking part when the stop part is in the locked state. See element [1d] and claims 3 and 5. Additionally: The upper portion of the Tool Box includes at least one Second Connection Part defining a recess configured to mate with the locking buckle, as shown in the following images.

further comprising a second resilient member combined between the holding slot and the stop part, wherein the stop part is extended from the slot in the locking part when the stop part is in the unlocked state, and wherein the stop part is retracted in the slot in the locking part when the stop part is in the locked state.	 Top View of Tool Box Lid Portion  Closeup of Second Connection Part The locking part comprises an opened holding slot with a second resilient member between the holding slot and the stop part, as shown in the following images.



The stop part extends from the slot in the locking part when the stop part is in the unlocked state and is retracted when in the locked state, as shown in the following images.

	  Stop Part in the Unlocked State (extended) Stop Part in the Locked State (retracted)
Claim 16	
[16a] The storage box of claim 15, further comprising a bottom comprising a projection, four sidewalls projecting from the bottom, a hinged lid to access an interior, and a positioning slot on the hinged lid, wherein two adjacent said storage boxes are located with respect to each other by	*See, supra,* element [14a].

the projection of the bottom and the positioning slot on the lid, wherein the lid comprises four projections and the bottom comprises four positioning recesses, wherein two adjacent said storage boxes are located with respect to each other by the projection and the four positioning recesses on the bottom and the positioning slot and the four projections on the lid;	
[16b] wherein the four projections on the lid project upward from a top face of the lid, and the four positioning recesses of the bottom are located in a bottom face.	*See, supra,* element [14b].

Appendix B

Infringement Claim Chart Showing Infringement of U.S. Patent 11,192,689 by the CaseStack Tool Bag (Model Number KB-CS-S20, the "Tool Bag") Used with the Kobalt CaseStack Plastic Tool Box (Model Number KCS-SSBOX1-03, the "Kobalt Box")

Claim Language	Elements in the Tool Bag Used with the Kobalt Box[1]
Claim 1	
[1a] A stackable storage system comprising:	The Tool Bag, when used with the Kobalt Box, provides a stackable storage system. For example, the Tool Bag and the Kobalt Box are both sold through Lowe's Home Improvement facilities under the "Kobalt" brand. The Tool Bag and the Kobalt Box both employ the "CaseStack" technology, which provides for a modular and stackable system of storage containers. As promoted in a video on a Lowe's webpage for the Kobalt Box: "The K-Stack Suitcase is compatible with the full line of Kobalt modular storage boxes and accessories and secures via quick connect sliding locks." (See https://www.lowes.com/pd/Kobalt-CaseStack-Small-Storage-Box/5012928201 (last visited August 13, 2024)).  Image taken from https://www.lowes.com/pd/Kobalt-Kobalt-Casestack-20-in-Closed-Bag/5014456323 (last visited August 13, 2024).

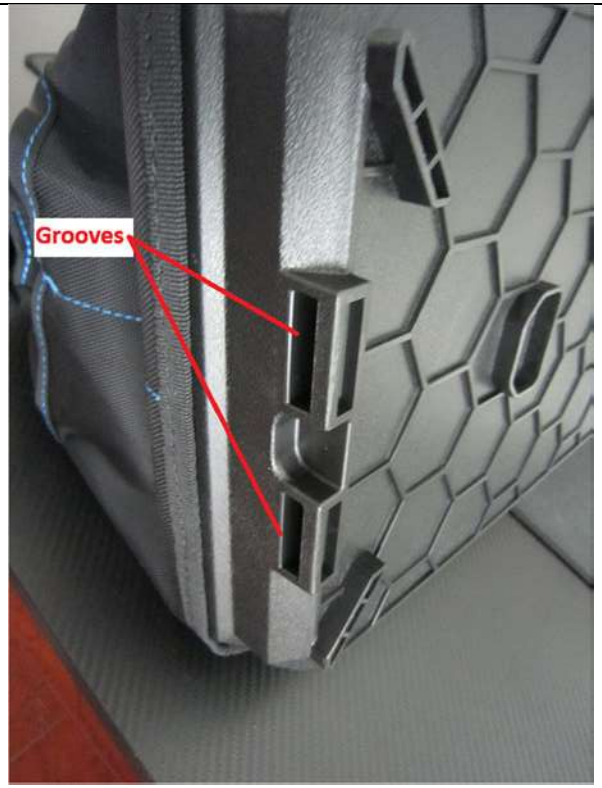
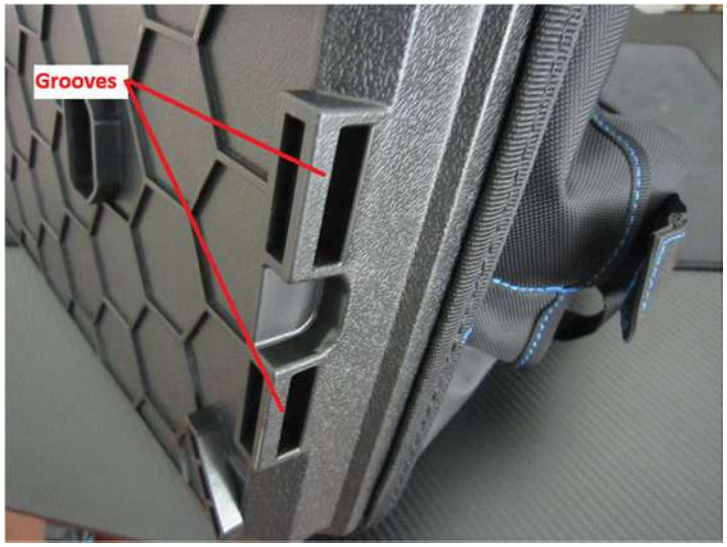
[1] As set forth in the Complaint, Meridian International, Co., Ltd. alleges that the Kobalt CaseStack Blue Polyester 20-in Zippered Tool Bag (model number KB-CS-S20) and Kobalt CaseStack Blue Polyester 20-in Tool Tote (model number KB-CS-T20) infringe U.S. Patent 11,192,689. For purposes of these charts, the Kobalt CaseStack Blue Polyester 20-in Zippered Tool Bag (model number KB-CS-S20, the "Tool Bag") product is examined. The Kobalt CaseStack Blue Polyester 20-in Tool Tote (model number KB-CS-T20) also includes the "CaseStack" modular technology as used in the Tool Bag, and it infringes U.S. Patent 11,192,689 in the same manner. Further, these charts analyze the use of the Tool Bag in connection with another CaseStack product, the Kobalt CaseStack Plastic Tool Box (model number KCS-SSBOX1-03, the "Kobalt Box"), though the same analysis would apply to use of the accused products with other Kobalt CaseStack products.

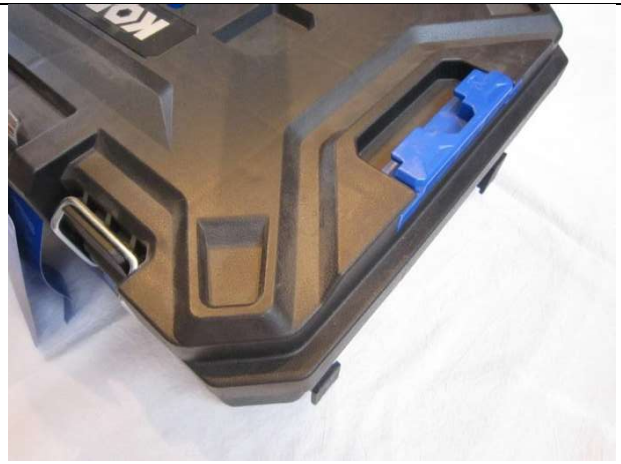
	 Image taken from https://www.lowes.com/pd/Kobalt-CaseStack-Small-Storage-Box/5012928201 (last visited August 13, 2024).  Image taken from https://www.lowes.com/pd/Kobalt-CaseStack-Small-Storage-Box/5012928201 (last visited August 13, 2024).

	 Image taken from https://www.lowes.com/pd/Kobalt-CaseStack-Small-Storage-Box/5012928201 (last visited August 13, 2024).
[1b] a first storage container configured and arranged to be selectively connected to a second storage container,	The Tool Bag is a first storage container configured and arranged to be selectively connected to a second storage container. For example, the Tool Bag is a storage container, having 30 storage pockets.

	 . Image of Tool Bag showing attached marketing material. As shown in the following enlargement from the above image, the Tool Bag is marketed as being "COMPATIBLE WITH CASESTACK," technology providing modular connectivity. *See* element [1a].

	 The Kobalt Box is one of many Kobalt storage containers that include the CaseStack interlocking technology. *See* element [1a]. The Tool Bag and the Kobalt Box (a second storage container) are both sold as modular CaseStack products and are configured to be selectively connected together. As promoted in a video on a Lowe's webpage for the Kobalt Box: "The K-Stack Suitcase is compatible with the full line of Kobalt modular storage boxes and accessories and secures via quick connect sliding locks." *See* https://www.lowes.com/pd/Kobalt-CaseStack-Small-Storage-Box/5012928201 (last visited August 13, 2024).
[1c] wherein the first storage container comprises of at least one locking groove and the second container comprises a sliding mechanism for selectively engaging the locking groove to connect and hold the	The Tool Bag (the first storage container) comprises of at least one locking groove and the Kobalt Box (the second container) comprises a sliding mechanism for selectively engaging the locking groove to connect and hold the first storage container to the second storage container. For example, the Tool Bag includes two (at least one) locking grooves at either end of the hard molded base. See the following images showing the grooves on both sides of the Tool Bag:

first storage container to the second storage container, and	  Likewise, at either end of the top of the Kobalt Box there is a sliding mechanism comprising a blue slider and associated structural assemblies, as shown in the following images:

	 Kobalt Box (with sliding mechanism in the locked position)  Kobalt Box (with sliding mechanism in the unlocked position) The sliding mechanism and the grooves are configured to connect and to hold the Tool Bag together with the Kobalt box (or other CaseStack product).




First end of Kobalt Box and a first end of the Tool Bag in a connected configuration.




Second end of Kobalt Box and a second end of the Tool Bag in an unconnected configuration.

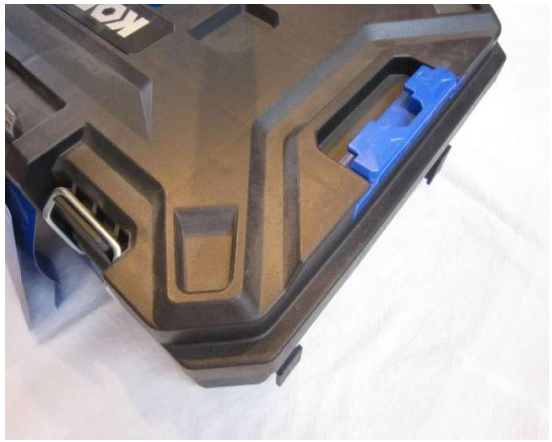
	 Kobalt Box connected to Tool Bag

<table>
<tr><td></td><td> 
Second end of the Kobalt Box unconnected to the Tool Bag.
 
Second end of the Kobalt Box connected to the Tool Bag.</td></tr>
<tr><td>[1d] wherein a portion of the sliding mechanism extends laterally away from a side surface of the second container when the sliding mechanism is disengaged from the locking groove and wherein the portion of the sliding mechanism is coplanar with the side surface of the second container when the sliding mechanism is engaged with the</td><td>A portion of the sliding mechanism of the Kobalt Box extends laterally away from a side surface of the second container (Kobalt Box) when the sliding mechanism is disengaged from the locking groove and wherein the portion of the sliding mechanism is coplanar with the side surface of the second container when the sliding mechanism is engaged with the locking groove.

For example, as shown in the marked-up figures of the second end of the Kobalt Box below, when the blue slider (a portion of the sliding mechanism of the Kobalt Box) is disengaged from the locking grooves of the Tool Bag, the blue slider extends laterally away from a side surface of the Kobalt Box.</td></tr>
</table>

locking groove.	 Blue Slider (a portion of the sliding mechanism) is extended away from a side surface of second container (Kobalt Box) when disengaged from the locking groove Likewise, as shown in the marked-up figures of the first end of the Kobalt Box below, when the sliding mechanism of the Kobalt Box is engaged with the locking grooves of the Tool Bag, the blue slider (a portion of the sliding mechanism) is coplanar with the same side surface of the Kobalt Box. 

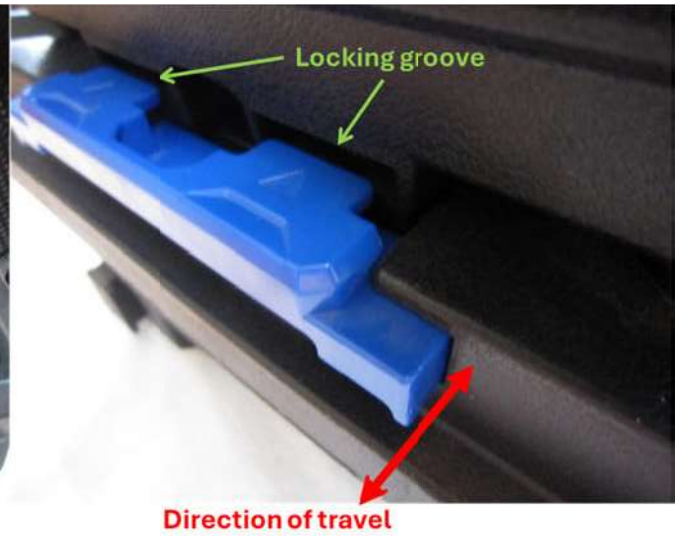
	 Blue slider (a portion of the sliding mechanism) is coplanar with the side surface of the second container (Kobalt Box) when engaged with the locking groove
Claim 2	
[2a] The stackable storage system of claim 1, wherein the sliding mechanism further comprises of a slider that moves between the engaged and disengaged position with respect to the locking groove.	The sliding mechanism further comprises of a slider that moves between the engaged and disengaged position with respect to the locking groove. For example: See claim 1. Additionally: The sliding mechanism comprises a slider (shown as the blue component in the following figures):





The slider moves between an engaged (retracted) position and a disengaged (extended) position with respect to the locking groove of the Tool Bag:

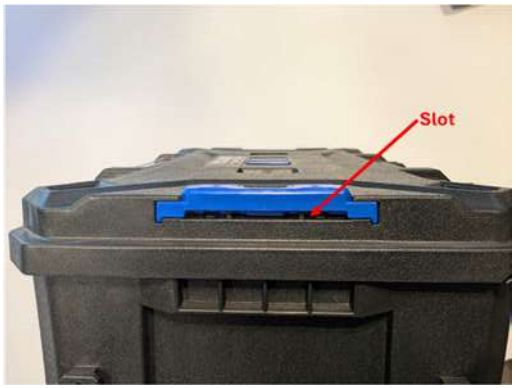
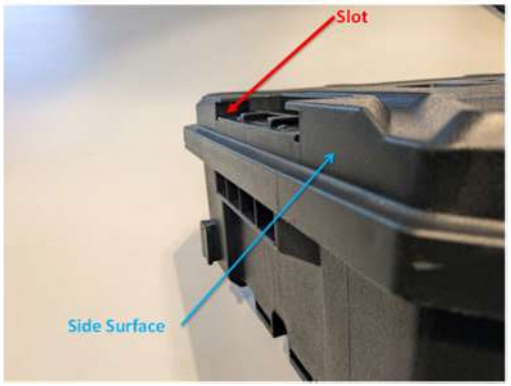


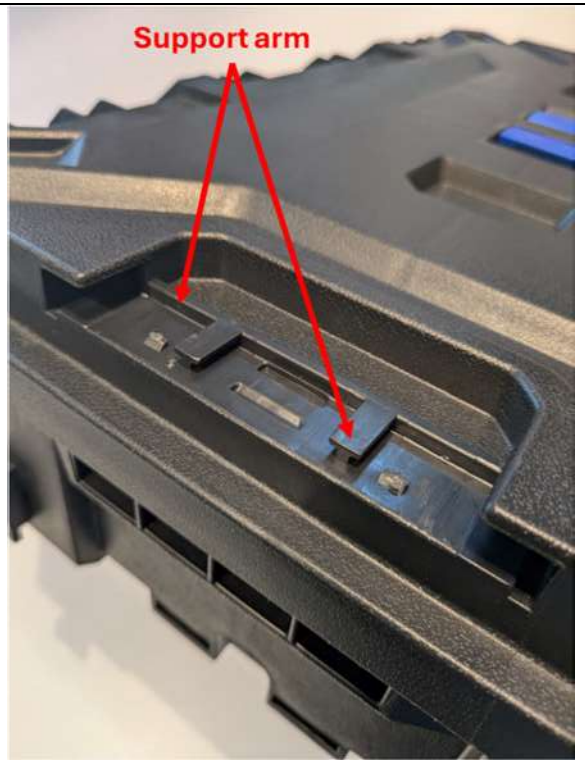


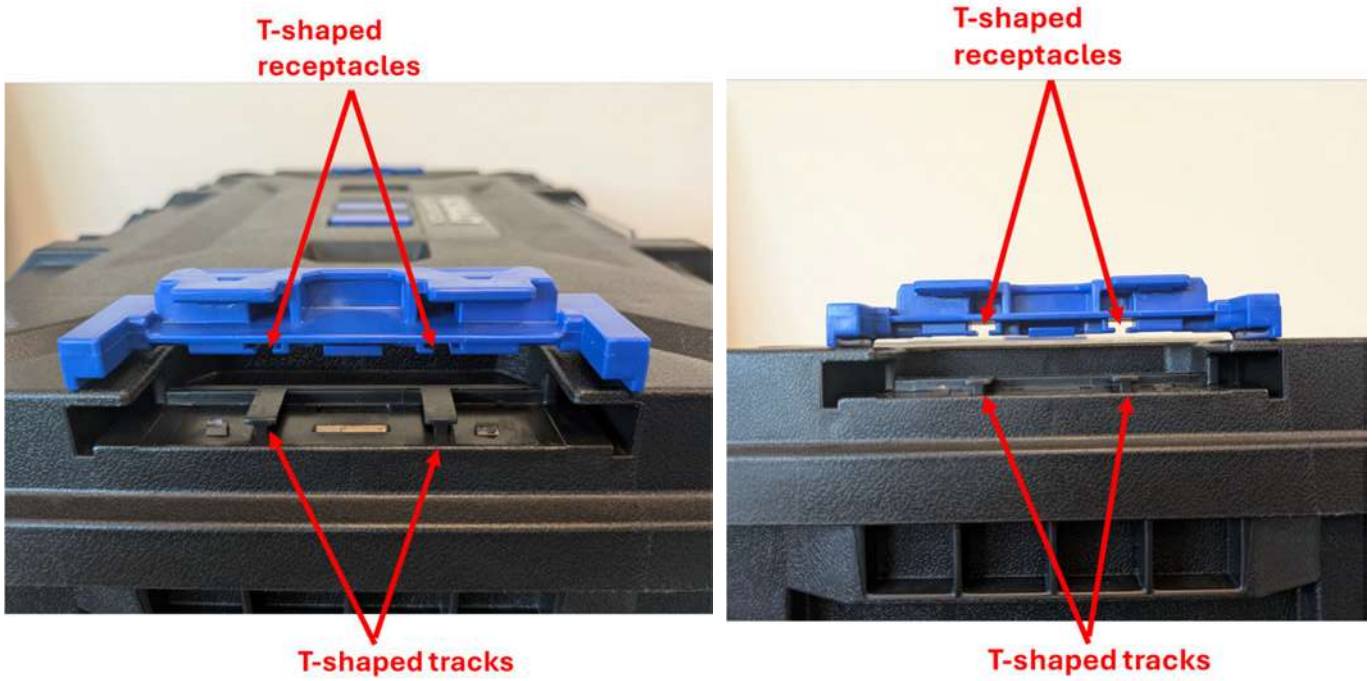
	 Blue slider disengaged with respect to locking groove.  Blue slider engaged with respect to locking groove.
Claim 3	
[3a] The stackable storage system of claim 2, wherein the slider has a side surface that is perpendicular to the direction of travel of the slider between the engaged and disengaged position with respect to the locking groove and	The slider has a side surface that is perpendicular to the direction of travel of the slider between the engaged and disengaged position with respect to the locking groove. For example: See claim 2. Additionally: The slider moves along a direction of travel inward (retraction to the engaged position with respect to the locking groove) and outward (extension to the disengaged position with respect to the locking groove). This path is perpendicular to the side surface of the blue slider.

	
[3b] the side surface of the slider is coplanar with the side surface of the second container when the slider is engaged with the locking groove.	The side surface of the slider is coplanar with the side surface of the second container when the slider is engaged with the locking groove. For example: See claim 2. Additionally: When the blue slider of the Kobalt Box is engaged with the locking groove of the Tool Bag, the side surface of the blue slider is coplanar with the side surface of the Kobalt Box:

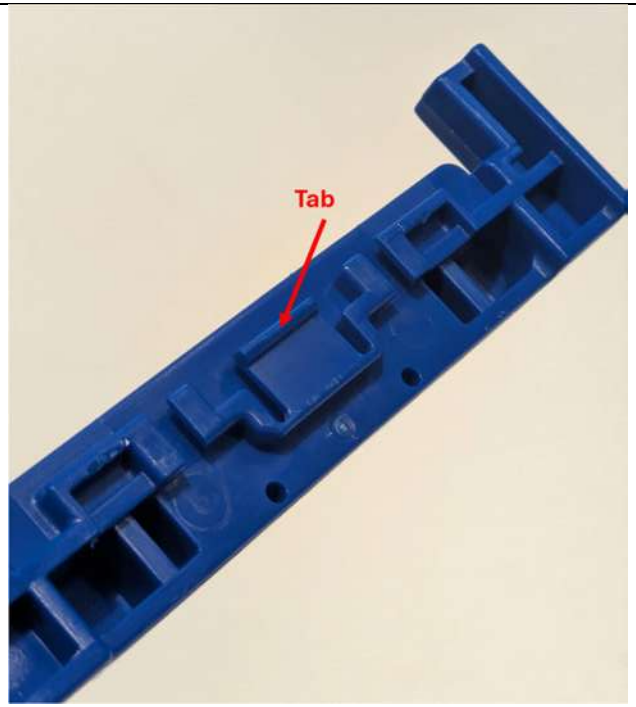
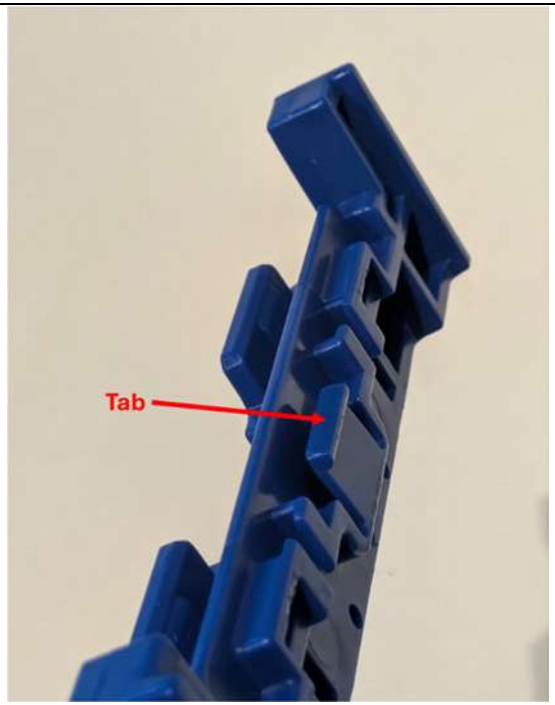
	   Side surface of blue slider is coplanar with the side surface of the Kobalt Box when engaged with the locking groove.
Claim 4	
[4a] The stackable storage system of claim 3, wherein the second storage	The second storage container further comprises of a slot in the side surface of the container with a support arm extending across the slot. For example: See claim 3. Additionally:

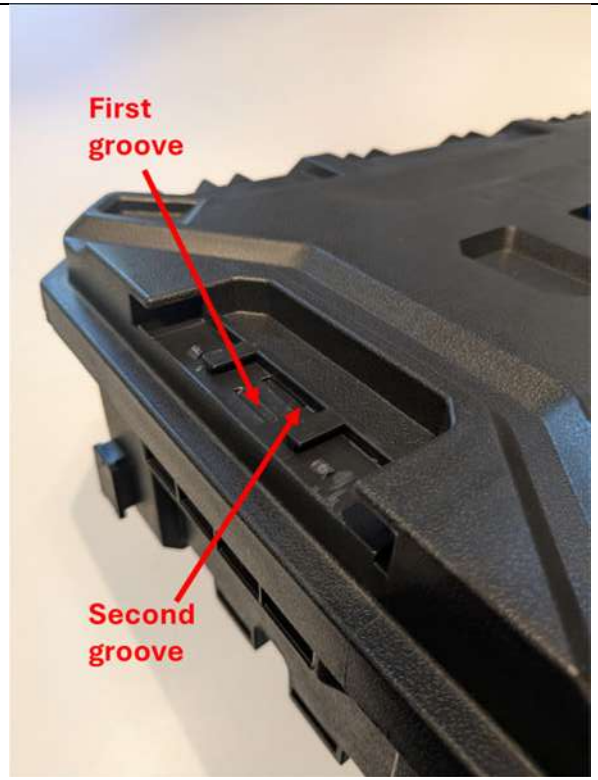
container further comprises of a slot in the side surface of the container with a support arm extending across the slot,	The Kobalt Box comprises a slot in the side surface, as shown:   The Kobalt Box furth comprises a support arm extending across the slot, as shown:

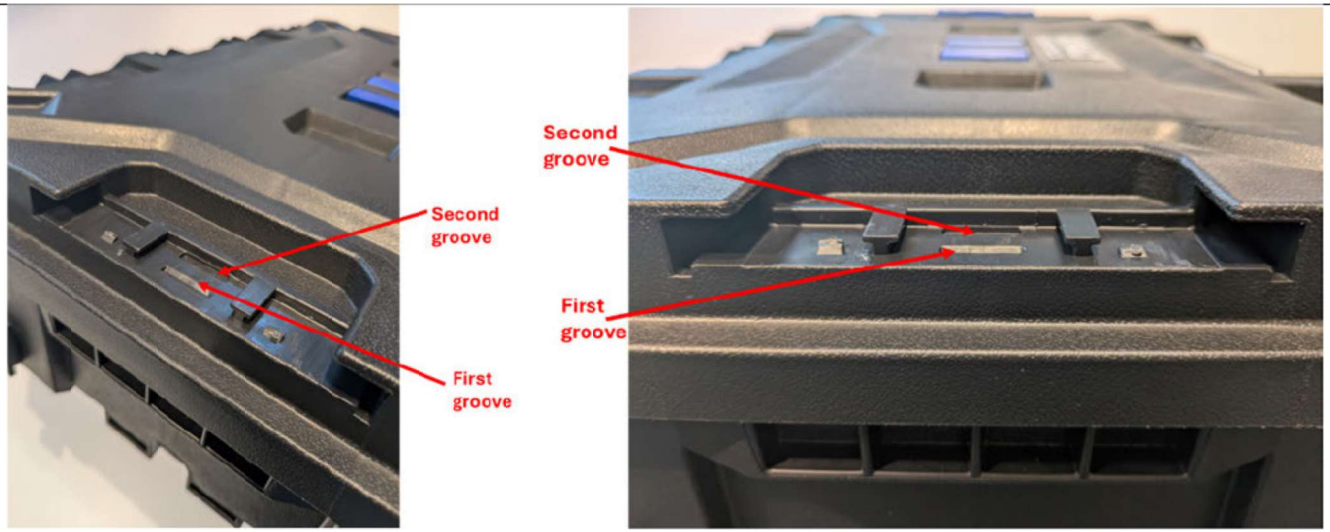
	 
[4b] wherein the slider is engaged with the support arm to move between a locked position that corresponds to the engaged position of the locking groove and an unlocked position	The slider is engaged with the support arm to move between a locked position that corresponds to the engaged position of the locking groove and an unlocked position that corresponds to the disengaged position of the locking groove. For example: See claim 3. Additionally: The blue slider is coupled to a portion of the support arm, which allows the blue slider to retract and extend, thereby moving from an engaged position with the locking groove and a disengaged position with the locking groove. To follow are pictures showing the blue slider disassembled from the sliding

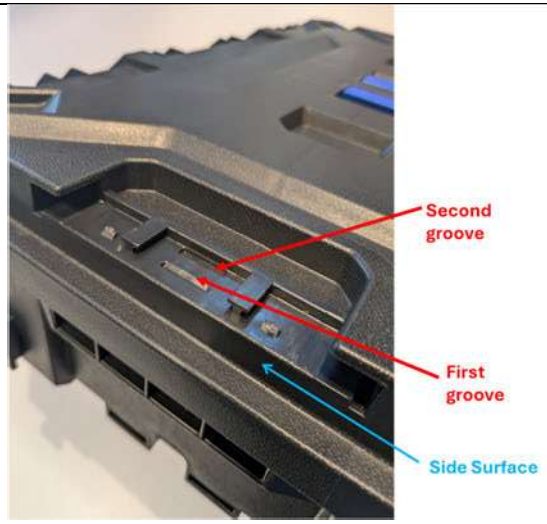
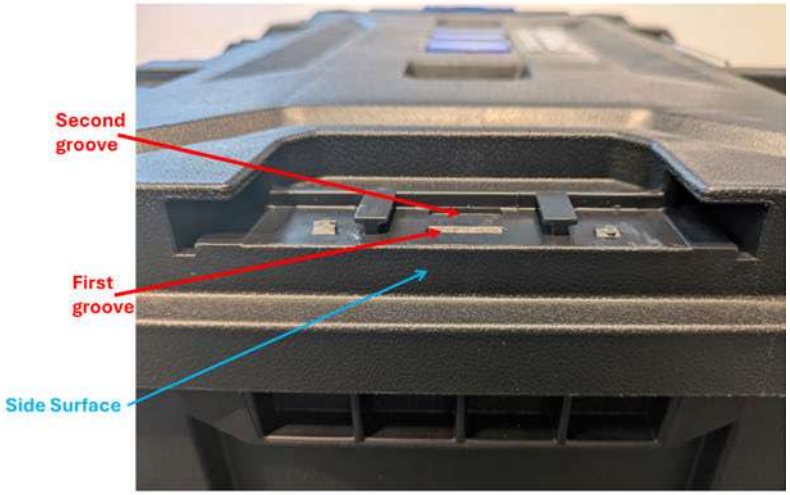
that corresponds to the disengaged position of the locking groove.	mechanism.  The support arm and the blue slider engage each to control the direction of the blue slider's movement. For example, the support arm includes T-shaped tracks that correspond to T-shaped receptacles on the blue slider. The slider moves along the support arm between a locked position that corresponds to the engaged position of the locking groove and an unlocked position that corresponds to the disengaged position of the locking groove. See claim 2. Also:

	 Blue slider disengaged with respect to locking groove.  Blue slider engaged with respect to locking groove.
Claim 5	
[5a] The stackable storage system of claim 4, wherein the support arm further comprises of a first engaging groove for holding the slider in the unlocked position and a second engaging groove for holding the slider in the locked position.	The support arm further comprises of a first engaging groove for holding the slider in the unlocked position and a second engaging groove for holding the slider in the locked position. For example: See claim 4. Additionally: The blue slider comprises a tab on the lower portion of the slider.

	  The support arm includes two grooves that engage the tab of the blue slider and hold the blue slider in place. The first groove holds the blue slider in the unlocked (extended) position and the second groove holds the blue slider in the locked (retracted) position.

	 First groove Second groove  First groove Second groove

	
Claim 6	
[6a] The stackable storage system of claim 5, wherein the first engaging groove is closer to the side surface of the second container than the second engaging groove.	The first engaging groove is closer to the side surface of the second container than the second engaging groove. For example: See claim 5. Additionally: As shown in the images, the first groove is closer to the side surface of the Kobalt Box than the second groove.

	 Second groove First groove Side Surface  Second groove First groove Side Surface