IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

HANDSFREE LABS LICENSING, LLC, FAST IP, LLC, and KIZIK DESIGN, LLC *Plaintiffs,* v. SKECHERS U.S.A., INC., *Defendant.*	Case No. 2:25-cv-00744-JRG

PLAINTIFFS' AMENDED DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS

Pursuant to the Court's October 20, 2025, Order and Local Patent Rules 3-1 and 3-2, Plaintiffs make the following Amended Disclosure of Asserted Claims and Infringement Contentions and Accompanying Document Production as to Defendant Skechers U.S.A., Inc. ("Skechers"). This document collectively refers to Plaintiffs as either "Plaintiffs" or "HFL."

HFL waives no claim, contention, or argument regarding the factual and/or legal details of the following preliminary infringement contentions. The following should not be construed as HFL's preliminary construction of any asserted claim or claim term. HFL reserves the right to change, amend, supplement, or otherwise alter these contentions based on receipt of further information that will be provided by, produced by, or otherwise made available by Skechers through discovery that is not available at the time of these disclosures. For example, HFL does not have available to it, and Skechers has not yet produced, Skechers documents describing all of its products with designs and functionality similar to what is described in this document. As explained in HFL's motion to compel on the issue, Skechers has failed to meet its technical-production

obligations and is refusing to produce technical materials that would permit a more fulsome analysis of all of its footwear—including thwarting the ability of HFL to determine some of the structures and functionality not apparent from photos of the outside of the footwear. We therefore expect that once we receive the needed technical information we will review it and may add more models and styles to the various Features Sets described below. We are, however, amending these contentions now out of an abundance of caution and as part of our ongoing diligence to update the contentions as more information arrives.

Moreover, t~~T~~he claim charts in the attached Exhibits are not designed to represent the entire scope of infringement but are merely intended to illustrate examples of manners in which the Accused Products infringe the identified claims of HFL's Patents. Further, the division of claim elements in the attached claim charts is neither intended to be a modification of the claim language itself nor an admission that the claims should be construed by the division. Rather, the division of claim elements is provided for convenience and clarity. HFL's contentions apply to Skechers' products and any other similar past, present, or future products with the same or substantially similar features. HFL reserves all rights to rely on additional evidence in its possession and evidence yet to be discovered.

Shared Features of the Accused Products

Skechers makes and sells many models of its Hands Free Slip-ins[1] and Swift Fit shoes (collectively, "Hands Free Slip-ins")[2] that exhibit various combinations of features including elements such as a sole, upper, and firm heel structure. An example model is depicted and

[1] As of November 2025, ~~Currently,~~ Skechers listed~~s~~ over 1,150 individual models on its website. *See* https://www.skechers.com/technologies/comfort-technologies/slip-ins/

[2] HFL defines "Hands Free Slip-ins" or "Slip-ins" to include the footwear included within HFL's definition of "Hands-Free/Slip-On Products" in HFL's June 26, 2026, Second Set of Interrogatories.

annotated below.

https://www.skechers.com/skechers-slip-ins-ultra-flex-3.0---right-away/232452W_BLK.html

Various models additionally feature Skechers-branded elements such as Heel Pillow® and Stretch Fit® upper material.

Comfort Technologies

Skechers Hands Free Slip-Ins

SLIP IN™ to pure comfort and convenience with Skechers Hands Free Slip-ins®. Easy-wear shoes designed with our Heel Pillow® that holds your foot securely in place.

Stretch Fit

With a sleek and seamless design our Stretch Fit® footwear provides a comfortable sock-like feel that's effortless to wear.

https://www.skechers.com/skechers-slip-ins-ultra-flex-3.0---right-away/232452W_BLK.html

As of around November 2025 Skechers ~~currently~~ categorized~~s~~ 88 Hands Free Slip-ins products as featuring a Stretch Fit® upper, including e.g., Ultra Flex 3.0 variants such as Right

Away.[3]

Further, various Skechers models include additional elastic elements such as stretch laces, elastic tongue strips, and elastic gores. For instance, Ultra Flex 3.0 Right Away lists "Jersey mesh upper with stretch laces" under Design Details.[4] Models with discrete tongues such as Glide-Step Pro feature elastic strips attached to the tongue as depicted below.

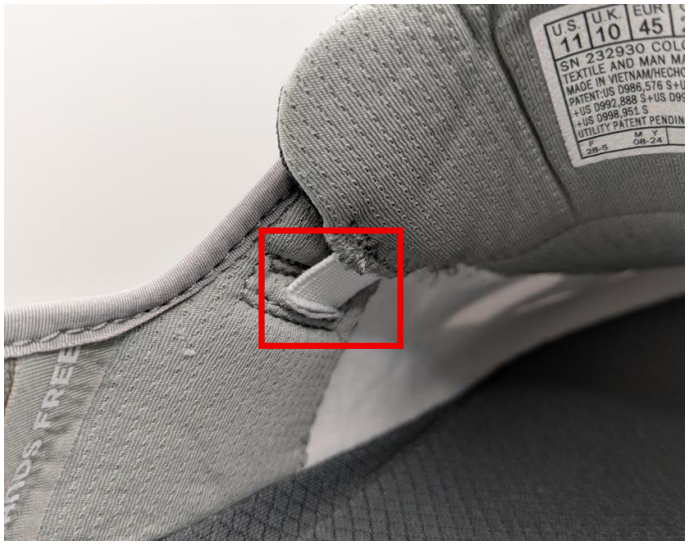

Photo of Glide-Step Pro lateral elastic element.

[3] https://www.skechers.com/technologies/comfort-technologies/slip-ins/?prefn1=technologyFeatureName&prefv1=Stretch%20Fit&start=0&sz=24

[4] https://www.skechers.com/skechers-slip-ins-ultra-flex-3.0---right-away/232452W_BLK.html

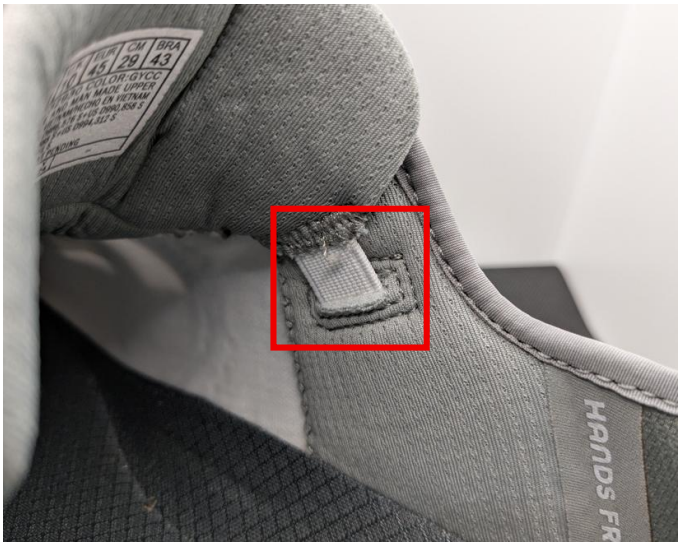

Photo of Glide-Step Pro medial elastic element.

Other Skechers models such as BOBS Sport Squad Chaos – Daily Glitz feature elastic gores on each side of the upper as depicted below.

https://www.skechers.com/skechers-slip-ins-bobs-sport-squad-chaos---daily-glitz/117622_BBK.html

Skechers variously combines those features—e.g., a Stretch Fit upper, elastic elements

(tongue strips, stretch laces, gores)—in footwear that includes a sole, an upper, and a firm heel structure, to form various infringing combinations. The following table summarizes categories some of those combinations (as "Feature Set Nos."):

Feature Set No.	Features
1	Sole, upper, and firm heel structure
2	Feature Set No. 1 + Stretch Fit upper
3	Feature Set No. 1 + Elastic tongue strips
4	Feature Set No. 3 + Stretch laces
5	Feature Set No. 1 + Elastic gores
6	Feature Set No. 5 + Stretch laces
7	Feature Set No. 2 + Stretch laces

Skechers offers infringing Hands Free Slip-ins shoes exhibiting at least the features according to the sets identified above. The following shoe models are non-limiting examples of those feature sets, and include all color variants and men's, women's, boy's, and girl's versions exhibiting substantially similar features:

- **Feature Set No. 1:** Hands Free Slip-ins models exhibiting the sole, upper, and firm heel structure, including~~:~~ certain products branded Summits – High Range, Keepsakes Cozy Mid, Go Golf Elite 5, Work: Santoro, and Slade Ultra – Turner, and including at least Skechers Style Nos. 100439, 100440, 100593, 100615, 100718, 100732, 100736, 100737, 100743, 100762, 100764, 100823, 100918, 104288, 104289, 104319, 104379, 104421, 104425, 104426, 104427, 104438, 104445, 104446, 104447, 104448, 104450, 104451, 104457, 104458, 104466, 104494, 104512, 104532, 104546, 104547, 104552, 104556, 104557, 104559, 104566, 104571, 104574, 104576, 104577, 104610, 104614, 104615, 104616, 104639, 104640, 104657, 104695, 104700, 104703, 104732, 104736, 104737, 104743, 104744, 104747, 104750, 104777, 104779, 104781, 104782, 104783,

104801, 104802, 104805, 104838, 108127, 108141, 108144, 108151, 108152, 108154, 108155, 108156, 108159, 108172, 108175, 108194, 108208, 108209, 108217, 108218, 108229, 108233, 108234, 108235, 108246, 108260, 108261, 108270, 108283, 108297, 108304, 108313, 108320, 108336, 108353, 108356, 108370, 108376, 114246, 114247, 114248, 114728, 114729, 114742, 114810, 114811, 114812, 114813, 114814, 114815, 114816, 114818, 114825, 114826, 114827, 114830, 114831, 114841, 114843, 114845, 114852, 114853, 114855, 114856, 114857, 114858, 114862, 114864, 114865, 114884, 114885, 114888, 114890, 114893, 114895, 114899, 117246, 117247, 117248, 117249, 117253, 117324, 117392, 117497, 117498, 117499, 117500, 117502, 117504, 117505, 117508, 117509, 117617, 117620, 117622, 117623, 117624, 117626, 117627, 117629, 117630, 117631, 117638, 117639, 117661, 117710, 117711, 117712, 117713, 117756, 117757, 117760, 117790, 118113, 118300, 118302, 118303, 118305, 118309, 118310, 118311, 118312, 118317, 118342, 118412, 118419, 118420, 118421, 118422, 118423, 118424, 118425, 118431, 118435, 118451, 123062, 123085, 123110, 123126, 123130, 123131, 123140, 123141, 123145, 123147, 123149, 123153, 124279, 124284, 124287, 124372, 124566, 124568, 124569, 124625, 124626, 124627, 124641, 124643, 124644, 124645, 124646, 124647, 124649, 124680, 124682, 124691, 124692, 124693, 124697, 124761, 124770, 124772, 124799, 124820, 124822, 124823, 124828, 124835, 124836, 124839, 124842, 124845, 124846, 124848, 124879, 124915, 124916, 124963, 124966, 124975, 125063, 125077, 125079, 125080, 125086, 125087, 125115, 125116, 125117, 125120, 125121, 125124, 125143, 125144, 125156, 125213,

125219, 125222, 125228, 125231, 125233, 125239, 125242, 125250, 125253, 125258, 125277, 125278, 125279, 125280, 125283, 125310, 125315, 125319, 125326, 125337, 125338, 125342, 125343, 125502, 125503, 125507, 125513, 125516, 125521, 125523, 125525, 125582, 125586, 125642, 125643, 125644, 125658, 125665, 125708, 125718, 125722, 125738, 125742, 125800, 125803, 125806, 125840, 125843, 125852, 125881, 125925, 125926, 125942, 125961, 126031, 126091, 126093, 126094, 126095, 126102, 126142, 126303, 128571, 128572, 128615, 128619, 128627, 128635, 128642, 128643, 128653, 128902, 128905, 128924, 128930, 128944, 128945, 128946, 128947, 128965, 128966, 129006, 129185, 129200, 129258, 129281, 129283, 129400, 129401, 129403, 129404, 129410, 129455, 129473, 129474, 129476, 129478, 129484, 129505, 129606, 129611, 129616, 129626, 129630, 129637, 129642, 129645, 129646, 129655, 129710, 129711, 129724, 129750, 129760, 129782, 129800, 129825, 136536, 136539, 136541, 136542, 136543, 136544, 136545, 136548, 137210, 137216, 137229, 137251, 137255, 137290, 137291, 137464, 137465, 137469, 137471, 138100, 138181, 138182, 138185, 138186, 138187, 138190, 138215, 138241, 138343, 138344, 138361, 138362, 138363, 138370, 138376, 138377, 138385, 138388, 138403, 138404, 138410, 138412, 138416, 138419, 138422, 138434, 138435, 138437, 138497, 138511, 138514, 138536, 138543, 138557, 138566, 138606, 138607, 138651, 139001, 139003, 139004, 139005, 139165, 144241, 144569, 144795, 144800, 144801, 144802, 144810, 144811, 144816, 144853, 149568, 149591, 149707, 149708, 149709, 149710, 149711, 149712, 149808, 149817, 149937, 150012, 150016, 150030, 150031, 150032, 150066,

150079, 150110, 150118, 150123, 150127, 150128, 150129, 150146, 150148, 150166, 150168, 150174, 150175, 150177, 150180, 150182, 150183, 150184, 150190, 150191, 150192, 150193, 150199, 150218, 150238, 150239, 150250, 150261, 150262, 150263, 150264, 150265, 150273, 150274, 150275, 150277, 150280, 150284, 150285, 150289, 150295, 150297, 150328, 150331, 150333, 150334, 150338, 150354, 150355, 150381, 150404, 150410, 150411, 150412, 150413, 150416, 150417, 150419, 150420, 150422, 150425, 150427, 150429, 150433, 150434, 150438, 150440, 150443, 150445, 150447, 150449, 150450, 150457, 150458, 150462, 150464, 150469, 150470, 150476, 150482, 150500, 150501, 150507, 150508, 150510, 150512, 150513, 150514, 150515, 150516, 150537, 150541, 150542, 150543, 150545, 150560, 150564, 150565, 150581, 150582, 150584, 150610, 150611, 150612, 150613, 150614, 150619, 150640, 150641, 150643, 150645, 150703, 150710, 150723, 150727, 150728, 150730, 150750, 150751, 150752, 150760, 150801, 150802, 150805, 150806, 150807, 150810, 150811, 150842, 150843, 150844, 150849, 150881, 150920, 150922, 158698, 158699, 158705, 158788, 158820, 158846, 158873, 158877, 158911, 158918, 158958, 158969, 158980, 159013, 159055, 159061, 159247, 159249, 159295, 159303, 159313, 159412, 159459, 159505, 159547, 167872, 167875, 167876, 167880, 167894, 168030, 168056, 168057, 168100, 168107, 168113, 169109, 169119, 169157, 169158, 169167, 172100, 172101, 172115, 172117, 172121, 172205, 172215, 172220, 175292, 175294, 175489, 175490, 175491, 177111, 177112, 177116, 177117, 177118, 177184, 177197, 177205, 177207, 177209, 177218, 177219, 177343, 177408, 177523, 177531, 177586, 177587,

177631, 177632, 177633, 177667, 177684, 177698, 177721, 177747, 177748, 177764, 177771, 177795, 177831, 177876, 177880, 177883, 177887, 177888, 177890, 177931, 180016, 180138, 180147, 180157, 180173, 180194, 180225, 180235, 180265, 180270, 180272, 180277, 180308, 180405, 180580, 183005, 183006, 183022, 183023, 183083, 183093, 183151, 183156, 183177, 183193, 183222, 183223, 183224, 183225, 183227, 183232, 183279, 183312, 183313, 183402, 183412, 183420, 183421, 183432, 185008, 185081, 185166, 185222, 185223, 185269, 185270, 185271, 185315, 185322, 185323, 185325, 185327, 185328, 185329, 185366, 185368, 185370, 185440, 185460, 185462, 185540, 186000, 186001, 186002, 186003, 186004, 186005, 186006, 186007, 186008, 186036, 186037, 186040, 186041, 186061, 186070, 186100, 186104, 186110, 188003, 188022, 188026, 188027, 188055, 188065, 190002, 190113, 190115, 190155, 191943, 191955, 191958, 191959, 191960, 191989, 200171, 200204, 200205, 200206, 200211, 200213, 200214, 200215, 200217, 200231, 200234, 200240, 200249, 200254, 200281, 200293, 200298, 200303, 200304, 200310, 200319, 200337, 200348, 200349, 200366, 200367, 200394, 200404, 200419, 200424, 200431, 200450, 200452, 200454, 200456, 200458, 200459, 200464, 204804, 204806, 204809, 204810, 204839, 204847, 204866, 204871, 205046, 205056, 205059, 205061, 205067, 205073, 205074, 205082, 205086, 205088, 205167, 205169, 205183, 205188, 205192, 205198, 205201, 205202, 205204, 205210, 205211, 205212, 205217, 205218, 205219, 205237, 205249, 205256, 205265, 205266, 205279, 205285, 205293, 205303, 205304, 205307, 205311, 205313, 205314, 205315, 205316, 205317, 205319, 205323, 205326, 205333,

205334, 205335, 205337, 205340, 205341, 205343, 205344, 205351, 205352, 205353, 205356, 205364, 205370, 205381, 205400, 205401, 205451, 205452, 205465, 205466, 205467, 205469, 205479, 205490, 205511, 205513, 205514, 205515, 205516, 205517, 205518, 205545, 205547, 205554, 205585, 205597, 205599, 205606, 205624, 205625, 205637, 205639, 205640, 205652, 205656, 205680, 205694, 205701, 205739, 205746, 205757, 205772, 205773, 205795, 205796, 205814, 205819, 205845, 210546, 210596, 210604, 210606, 210609, 210636, 210650, 210792, 210802, 210803, 210810, 210811, 210828, 210830, 210839, 210840, 210846, 210863, 210864, 210871, 210882, 210889, 210890, 210891, 210910, 210956, 210959, 210965, 210981, 210994, 211005, 211008, 211010, 211012, 211013, 211021, 211031, 211032, 211042, 211043, 211047, 211052, 211069, 211077, 211105, 211108, 211109, 211117, 211145, 211146, 211151, 211162, 211163, 211182, 211191, 211196, 211207, 211233, 211234, 211248, 211249, 211252, 211262, 211276, 211319, 211321, 211324, 211325, 211334, 211342, 211343, 211367, 211378, 211382, 211384, 211389, 211390, 211428, 211430, 214066, 214082, 214090, 214110, 214124, 214125, 214126, 214130, 214131, 214140, 214141, 214145, 214147, 214149, 214153, 216258, 216259, 216278, 216279, 216283, 216284, 216285, 216300, 216301, 216314, 216324, 216326, 216330, 216332, 216333, 216334, 216335, 216351, 216352, 216372, 216375, 216410, 216411, 216425, 216491, 216496, 216505, 216510, 216522, 216550, 216553, 216584, 216600, 216601, 216602, 216604, 216641, 216648, 216660, 216661, 216663, 216665, 216681, 216689, 216697, 216741, 216773, 216774, 216783, 216784, 216797, 216812, 216905, 216946, 217017,

217024, 217035, 217053, 217054, 217058, 217060, 217075, 217076, 217082, 217109, 217128, 217145, 217147, 220313, 220347, 220380, 220381, 220389, 220392, 220415, 220416, 220421, 220422, 220423, 220425, 220510, 220515, 220526, 220527, 220529, 220553, 220564, 220565, 220569, 220584, 220611, 220622, 220645, 220661, 220664, 220701, 220761, 220762, 220837, 220839, 220852, 220853, 220880, 220887, 220909, 220936, 220940, 220952, 221000, 221040, 221104, 221120, 221141, 221200, 221222, 221240, 232405, 232444, 232445, 232446, 232447, 232448, 232450, 232451, 232452, 232454, 232455, 232456, 232457, 232458, 232459, 232460, 232462, 232463, 232464, 232465, 232466, 232469, 232614, 232618, 232619, 232620, 232621, 232642, 232712, 232810, 232811, 232839, 232846, 232860, 232862, 232900, 232901, 232921, 232922, 232923, 232926, 232928, 232930, 232932, 232939, 232940, 232952, 232962, 232967, 233010, 233011, 233014, 233023, 233026, 233031, 233037, 233038, 233039, 233045, 233046, 233047, 233054, 233059, 233102, 233103, 233105, 233107, 233110, 233111, 233133, 233135, 233150, 233156, 233175, 233183, 233194, 233201, 233204, 233244, 233270, 233271, 233272, 233290, 233291, 233303, 233321, 233330, 233331, 237195, 237322, 237445, 237447, 237449, 237450, 237563, 237622, 237634, 237649, 237659, 237664, 237689, 237690, 237699, 237711, 237744, 237750, 237760, 237769, 237799, 237800, 237812, 237814, 237815, 237840, 237886, 246100, 246101, 246115, 246117, 246121, 246205, 246215, 246220, 251016, 251017, 251020, 251021, 251022, 251025, 251026, 251027, 251030, 251031, 251032, 251033, 251034, 251035, 251036, 251049, 251052, 251065, 251066, 251081, 251082, 251100, 251102,

Formatted: English (United States)

251120, 251121, 251130, 251150, 251151, 251170, 251202, 254025, 254066, 254154, 254185, 254186, 254200, 254204, 254226, 255101, 256002, 256009, 256012, 256013, 256026, 256030, 256033, 256035, 256042, 256068, 256075, 256079, 256086, 256088, 256089, 256090, 256092, 256094, 256096, 256126, 256129, 256132, 256133, 256161, 256200, 256202, 256212, 256217, 256223, 303594, 303619, 303684, 303685, 303690, 303757, 303798, 303800, 303801, 303803, 303820, 303822, 303824, 303825, 303828, 303829, 303842, 303855, 303856, 303919, 303949, 304000, 304003, 304053, 304103, 304104, 304105, 304113, 304114, 310425, 403822, 403833, 403836, 403837, 403838, 403842, 403844, 403848, 403889, 403890, 403892, 403893, 403896, 403898, 403899, 404200, 404201, 404203, 404206, 404207, 404208, 404210, 404219, 404226, 407625, 210606W, 303619L, 303654L, 303685L, 303757L, 303798L, 303828L, 303855L , 303919L, 303949L, 304000L, 304003L, 304053L, 304103N, 304104L, 304105N, 304114N, 310425L, 403833L, 403839L, 403844L, 403848N, 403890L, 403892L, 403893L, 403898L, 404200L, 404201L, 404203L, 404206L, 404207L, 404210N, 404219L, 404226L. On information and belief, the style numbers that follow contain the structured/contoured heel that is shown in the representative products and fall within Feature Set 1; however, because this is not clear from the materials produced by Skechers to-date, HFL reserves the right to modify or withdraw these allegations upon further investigation and review: 104789; 108349; 108365; 114835; 114836; 114838; 114869; 114874; 114876; 114877; 114881; 114882; 139216; 141491; 144122; 144221; 144797; 144799; 144803; 144807; 144833; 144844; 144865; 144882; 144884; 144888; 150105; 150715;

150717; 158789; 167848; 167849; 168027; 168033; 168045; 168051; 168052; 168114; 169118; 169121; 169134; 169152; 169165; 169181; 169191; 169192; 169196; 169198; 185268; 185530; 188012; 205182; 205184; 205475; 211148; 220610; 220863; 256083; 302221; 302296; 303183; 303585; 303654; 403830; 403839; 403840; 403843; 403904; 407069; 144740; 303183N; 303585L; 303690L; 303690N; 304117L; 403822L; 403822N; 404208L; 404208N; 407069L; 407625L; 407625N.

- **Feature Set No. 2:** Includes certain products branded GO WALK Now – Sauntered, GO WALK 7 – Mia, Max Cushioning Arch Fit, GO WALK Now, Ultra Flex 4.0, Ultra Flex 3.0 (including Martha Stewart variants), Go Walk, Summits (including Mystic Glow, New Daily, Night Chic, True Ease, Sweet Glow, and Top Player variants), On-the-GO Flex Radiant, Arch Fit Inspire, Arch Fit Vista, Max Cushioning Elite 2.0, Max Cushioning Arch Fit 2.0, Max Cushioning Lite, GO WALK Joy, GO WALK Arch Fit N-Joy, GO WALK Arch Fit 2.0, Relaxed Fit Sport, Fashion Fit 2.0, Virtue, Breathe-Easy, Graceful, Arch Fit Sunny, GO WALK MAX, Arch Fit Refine 2.0, Skech-Air Dynamight, BOBS Sport B Flex, Arch Fit GO WALK Anywhere, GO WALK 7, GO WALK 8, GO WALK Travel, Billion 2 – Feelin' Knit, Arya, RF: Edgeride~~, Max Cushioning Endeavour~~, BOBS Sport Squad Chaos SR, and including at least Skechers Style Nos. 100736, 100762, 104457, 104639, 104695, 104736, 104743, 104747, 108246, 124641, 125343, 125843, 125926, 128945, 128966, 129611, 137216, 138497, 139165, 149710, 150262, 150263, 150264, 150274, 150285, 150354, 150482, 150510, 150643, 150801, 150802, 150805, 150806, 150807, 150810,

158873, 158918, 159247, 159249, 159412, 159547, 177531, 188027, 188055, 216301, 216372, 216665, 216784, 220565, 220569, 221222, 232452, 232900, 233011, 233133, 233201, 303757L, 303798L, 303828L, 403844L. There very likely are additional products within Feature Set 1 that are not, but should be, listed under Feature Set 2 because they have Stretch Fit uppers. Because of issues with Skechers production, including producing images (and nothing more, including no text descriptions of whether there is a stretch-fit upper) of certain products, it is difficult to determine everything that should be included in Features Set 2. Footwear styles not listed here but that fit within the Feature Set 2 description are also accused under Feature Set 2. HFL reserves the right to supplement this and the other Feature Sets after Skechers adequately supplements its production.

- **Feature Set No. 3:** Includes certain products branded ~~Max Cushioning Endeavor,~~ Aero Burst, and including at least Skechers Style Nos. 100762, 104466, 104494, 104512, 104532, 104556, 104614, 104615, 104744, 104750, 104781, 104783, 104789, 104801, 108172, 108233, 108261, 108270, 108283, 108320, 108336, 108353, 108356, 108376, 114810, 114812, 114815, 114853, 114888, 114890, 117324, 117392, 117624, 117756, 117757, 117760, 118113, 118423, 118431, 118451, 123085, 123110, 123126, 123131, 123145, 123147, 123149, 123153, 124697, 124835, 124836, 124846, 125116, 125121, 125124, 125143, 125144, 125156, 125319, 125342, 125513, 125516, 125523, 125525, 125582, 125643, 125665, 125840, 125852, 125881, 125925, 126031, 126091, 126093, 126094, 126102, 126142, 128615, 128643, 128965, 129006, 129185, 129200, 129400,

129403, 129404, 129410, 129473, 129476, 129626, 129637, 129724, 129760, 129782, 129800, 129825, 136536, 138215, 138385, 138557, 139001, 139005, 150066, 150295, 150338, 150404, 150411, 150412, 150413, 150417, 150419, 150420, 150507, 150508, 150510, 150513, 150537, 150541, 150542, 150543, 150641, 150645, 150703, 150723, 150728, 150730, 150760, 150843, 150844, 150881, 150922, 159505, 172101, 172117, 172121, 172205, 172215, 172220, 177184, 177197, 177209, 177218, 177219, 177748, 177831, 177876, 177883, 180265, 180272, 180277, 180580, 183156, 183222, 183223, 183224, 183227, 183402, 183412, 183420, 185008, 185166, 185269, 185323, 185328, 185329, 185368, 185370, 185460, 185462, 185540, 188065, 190002, 190113, 190155, 191943, 191958, 191960, 191989, 200211, 200231, 200234, 200240, 200293, 200303, 200319, 200337, 200348, 200349, 200419, 200424, 200431, 200450, 200452, 200458, 200459, 205212, 205285, 205314, 205333, 205341, 205352, 205353, 205465, 205585, 205624, 205637, 205640, 205652, 205694, 205701, 205773, 205819, 210981, 211031, 211032, 211146, 211162, 211163, 211191, 211196, 211276, 211319, 211324, 211367, 211428, 214110, 214124, 214125, 214126, 214130, 214131, 214145, 214147, 214149, 214153, 216324, 216326, 216332, 216352, 216375, 216505, 216601, 216602, 216660, 216661, 216741, 216783, 216797, 216812, 216946, 217017, 217024, 217035, 217075, 217128, 217145, 217147, 220415, 220421, 220425, 220526, 220553, 220611, 220661, 220887, 221000, 221040, 221120, 221141, 221200, 221240, 232446, 232618, 232619, 232712, 232921, 232922, 232930, 233014, 233023, 233026, 233038, 233047, 233054, 233102, 233110, 233111, 233135, 233175, 233194, 233244,

233270, 233290, 233291, 233303, 233330, 233331, 237450, 237563, 237622, 237634, 237649, 237664, 237699, 237744, 237760, 237800, 237812, 237815, 237886, 246101, 246115, 246117, 246121, 246205, 246215, 246220, 254154, 254200, 254204, 254226, 256002, 256009, 256026, 256094, 256096, 256126, 256132, 256202, 256212, 256217, 256223, 303654L, 303685L, 303855L , 303949L, 304003L, 304053L, 304103N, 304104L, 304105N, 304114N, 310425L, 403892L, 403893L, 404200L, 404201L, 404203L, 404206L, 404207L, 404210N, 404219L, 404226L. There very likely are additional products within Feature Set 1 that are not, but should be, listed under Feature Set 3 because they have elastic tongue strips. Many appear to have discrete tongues, but because of issues with Skechers production, including producing images (and nothing more, including no text descriptions of whether there is an elastic strip) of certain products, it is difficult to determine everything that should be included in Features Set 3. Footwear styles not listed here but that fit within the Feature Set 3 description are also accused under Feature Set 3. HFL reserves the right to supplement this and the other Feature Sets after Skechers adequately supplements its production.

- **Feature Set No. 4:** Includes certain products branded Glide-Step Pro (including Work Slip-Resistant variants), Waterproof: Respected (including John Deere variants), Contour Foam, Arch Fit Arcade, Glide-Step Sole, Work Slip-Resistant Relaxed Fit: Max Cushioning Elite – Remmal, Contour Foam (including Cozy Fit variants), Hot Shot, and including at least Skechers Style Nos. 100762, 104466, 104494, 104512, 104556, 104615, 104744, 104750, 104801, 108233, 108261, 108283, 108320, 108336, 108353, 108356, 114888, 114890, 117324, 117624,

118113, 118412, 118423, 118451, 124697, 124835, 124836, 125121, 125124, 125143, 125144, 125156, 125342, 125513, 125516, 125523, 125525, 125643, 125665, 125840, 125852, 125881, 125925, 126031, 126093, 126094, 126142, 128643, 128965, 129006, 129410, 129484, 138215, 138385, 138557, 139001, 139005, 150295, 150404, 150411, 150412, 150413, 150417, 150419, 150420, 150507, 150508, 150513, 150641, 150645, 150730, 150843, 150844, 150922, 159505, 177184, 177197, 177209, 177218, 177219, 177748, 177831, 177876, 177883, 180265, 180272, 180277, 183156, 183222, 183223, 183224, 183227, 183402, 183412, 183420, 185323, 185329, 185540, 188065, 190002, 190113, 190155, 191943, 191958, 191960, 191989, 200234, 200240, 200293, 200337, 200348, 200419, 200431, 200458, 200459, 205212, 205314, 205341, 205352, 205353, 205585, 205624, 205640, 205694, 205701, 210981, 211031, 211032, 211146, 211162, 211163, 211191, 211196, 211276, 211319, 211324, 211367, 211428, 216324, 216326, 216332, 216375, 216601, 216661, 216741, 216783, 216812, 216946, 217017, 217024, 217035, 217075, 217128, 217147, 220553, 220887, 232618, 232619, 232922, 232930, 233023, 233038, 233047, 233054, 233110, 233175, 233290, 233291, 233303, 237664, 237699, 237744, 237760, 237800, 237812, 237815, 237886, 254204, 256002, 256096, 256217, 256223, 303654L, 303855L , 303949L, 304003L, 304053L, 304103N, 304104L, 304105N, 304114N, 403892L, 403893L, 404200L, 404201L, 404206L, 404210N, 404219L, 404226L. There very likely are additional products within Feature Set 4 that are not, but should be, listed under Feature Set 4 because they have stretch laces. Many appear to have them, but because of issues with Skechers production,

including producing images (and nothing more, including no text descriptions concerning the laces) of certain products, it is difficult to determine everything that should be included in Features Set 4. Footwear styles not listed here but that fit within the Feature Set 4 description are also accused under Feature Set 4. HFL reserves the right to supplement this and the other Feature Sets after Skechers adequately supplements its production.

- **Feature Set No. 5:** Includes certain products branded BOBS Skip Cute August Air, Easy Going Casual Icon, Mark Nason: Mako Julien, Pollard – Wilfred, and Swift Fit Equalizer 4.0, and including at least Skechers Style Nos. 108154, 108159, 108175, 108194, 108235, 114246, 114247, 114742, 114810, 114811, 114812, 114813, 114814, 114815, 114816, 114818, 114831, 114841, 114865, 114893, 114899, 117249, 117253, 117499, 117500, 117502, 117509, 117622, 117627, 117710, 117711, 117712, 117713, 118300, 118302, 118305, 118420, 118421, 118422, 124761, 124770, 138344, 138362, 158698, 158699, 158788, 158958, 159061, 159313, 169109, 180016, 180308, 180405, 200213, 200215, 200217, 200249, 200254, 200304, 200456, 204804, 204806, 204809, 204810, 204839, 204847, 204866, 205061, 205167, 205169, 205183, 205192, 205202, 205210, 205237, 205256, 205265, 205279, 205303, 205313, 205323, 205326, 205334, 205356, 205370, 205401, 205451, 205452, 205469, 205490, 205518, 205545, 205547, 205597, 205606, 205680, 205739, 205746, 205757, 205772, 205796, 205814, 205845, 210546, 210596, 210604, 210792, 210839, 210840, 216259, 216333, 216334, 216425, 216505, 216600, 232455, 232463, 232620, 232926, 233103, 233107, 237750, 255101, 256030, 256042, 256079, 256088,

256090, 256133, 256200, 403822, 403836, 403838, 403896, 403839L. There very likely are additional products within Feature Set 5 that are not, but should be, listed under this Feature Set because they have elastic gores. footwear styles not listed here but that fit within the Feature Set 5 description are also accused under Feature Set 5. For the same reasons as stated above with respect to Features Set Nos. 2-4, Skechers' productions on this are inadequate, and HFL reserves the right to supplement this and the other Feature Sets after Skechers adequately supplements its production

- **Feature Set No. 6:** Includes certain products branded Swift Fit Delson, Bounder Brisk-Burst, BOBS Sport Squad Chaos – Daily Glitz, BOBS Sport Squad Chaos, Bounder - Simple Cute, and Swift Fit Sneaker, and including at least Skechers Style Nos. 108194, 200254, 255101, 403839L. In addition, as described above for Feature Set 5 and with respect to the stretch laces (see description above for Features Set 3), there very likely are additional products within this Feature Set, but due to Skechers' production it is difficult to determine. Footwear styles not listed here but that fit within this Feature Set description are also accused under Feature Set 6. HFL reserves the right to supplement this and the other Feature Sets after Skechers adequately supplements its production.
- **Feature Set No. 7:** Includes certain products branded Breathe-Easy - Home-Body, RF: Edgeride – Raygo, Ultra Flex 3.0 – Right Away, and including at least Skechers Style Nos. 100762, 104743, 137216, 150264, 158918, 159247, 159547, 177531, 232452, 233011. In addition, as described above for Feature Set 2 and with respect to the stretch laces (see description above for Features Set 3), there

very likely are additional products within this Feature Set, but due to Skechers' production it is difficult to determine. Footwear styles not listed here but that fit within this Feature Set description are also accused under Feature Set 7. HFL reserves the right to supplement this and the other Feature Sets after Skechers adequately supplements its production.

Disclosure of Asserted Claims and Infringement Contentions

1. Disclosure Under P.R. 3-1(a)

The asserted patents are: (1) U.S. Patent No. 11,633,006 ("'006 patent"); (2) U.S. Patent No. 11,871,811 ("'811 patent"); (3) U.S. Patent No. 12,121,096 ("'096 patent"); (4) U.S. Patent No. 12,274,325 ("'325 patent"); (5) U.S. Patent No. 12,458,101 ("'101 patent"); (6) ~~the patent issuing from allowed U.S. Pat. App. No. 18/371,414 ("'414 application"), which will issue as~~ U.S. Pat~~.~~ent No. 12,471,660 ("'660 patent"); and (7) U.S. Patent No. D1,037,641 ("'D641 patent").

Compared to HFL's November 2015 infringement contentions, HFL is narrowing the asserted claims against the Features Sets as follows~~HFL asserts that~~:

- ***~~at least~~ '006 Patent*** – Feature Set Nos. 2 and 7 ~~variously~~ infringe claim 1~~ of the '006 patent~~;
- ***'811 Patent*** – ~~at least~~ Feature Set No~~s~~. 2~~ 7~~ ~~variously~~ infringes claims 1, 3-4~~10~~, and 8-9; Feature Set No. 3 infringes claims 1, 4, 8, 10, and 12; ~~12~~ Feature Set Nos. 4, 6, and 7 infringe claims 1-2, 4-8, 10, and 12; and Feature Set No. 5 infringes claims 1, 3-4, 8, 10, and 12~~of the '811 patent~~;
- ***'096 Patent*** – ~~at least~~ Feature Set Nos. 4, 6, and 7 ~~variously~~ infringe claims 13-21, and 26-27~~ of the '096 patent~~;

- ***'325 Patent*** – ~~Each of~~ Feature Set No~~s~~. 1 infringes claims 1-3; Feature Set Nos. 2 and 5 ~~7 variously~~ infringe claims 1-7; Feature Set Nos. 3, 4, 6, and 7 infringe claims 1-5, and 7; Footwear in the above feature sets that also have a diamond heel pattern (such as listed in the "Exhibit G" entry below, and/or shown in 'D641 infringement charts) additionally infringe claims 8-9~~9 of the '325 patent~~;
- ***'101 Patent*** – ~~at least~~ Feature Set No~~s~~. 2 ~~7 variously~~ infringes claims 7, 9-12 and 16-18; Feature Set Nos. 3, 4, 6, and 7 infringe claims 7-12, 16, and 18; Feature Set No. 5 infringes claims 7-12, and 16-18 ~~of the '101 patent~~;
- ***'660 Patent*** – ~~Each of~~ Feature Set No~~s~~. 1 infringes claims 16-19; Feature Set Nos. 2-7 ~~variously~~ infringe claims 1-2, 6-9, and 11 ~~14, 16-17, and~~ 19 ~~21 of the '414 application, which will issue into the '660 patent~~; and
- ***'D641 Patent*** – the claim of the 'D641 patent is infringed by models with the diamond heel pattern, as set forth below.

2. Disclosure Under P.R. 3-1(b) and 3-1(c)

Charts identifying where each element of each asserted claim is found within the Accused Products are in the attached Exhibits A-G. HFL expressly reserves the right to augment and supplement its infringement contentions based upon additional information obtained through formal discovery.

Those charts identify representative accused products, as described below:

- **Exhibit A ('006 patent)** – This exhibit charts the asserted claim of the '006 patent against the following representative products: Ultra Flex 3.0 – Right Away (Style No. 232452), GO WALK Now – Sauntered (Style No. 216372). For purposes of the asserted claim, the products are representative of Feature Set No. 2 above, including

Skechers' Hands Free Slip-ins featuring Stretch Fit technology[5]. Additionally, the Ultra Flex 3.0 – Right Away product is representative of Feature Set No. 7 above.

- **Exhibit B1 ('811 patent)** – This exhibit charts the asserted claims of the '811 patent against the following representative products: Glide-Step Pro (Style No. 232930), Pollard – Wilfred (Style No. 205451), Swift Fit Delson (Style No. 255101). For purposes of the asserted claims, the Glide-Step Pro product is representative of Feature Set Nos. 3 and 4 above. Similarly, the Pollard – Wilfred and Swift Fit Delson products are representative of Feature Set No. 5 above and Feature Set Nos. 5 and 6 above, respectively.
- **Exhibit B2 ('811 patent)** – This exhibit charts the asserted claims of the '811 patent against the following representative products: Ultra Flex 3.0 – Right Away (Style No. 232452), GO WALK Now – Sauntered (Style No. 216372). For purposes of the asserted claim, the products are representative of Feature Set No. 2 above, including Skechers' Hands Free Slip-ins featuring Stretch Fit technology. Additionally, the Ultra Flex 3.0 – Right Away product is representative of Feature Set No. 7 above.
- **Exhibit C ('096 patent)** – This exhibit charts the asserted claims of the '096 patent against the following representative products: Glide-Step Pro (Style No. 232930), Swift Fit Delson (Style No. 255101), Ultra Flex 3.0 – Right Away (Style No. 232452). For purposes of the asserted claims, the Glide-Step Pro product is representative of Feature Set No. 4 above. Similarly, the Swift Fit Delson product is representative of

[5] https://www.skechers.com/technologies/comfort-technologies/slip-ins/?prefn1=technologyFeatureName&prefv1=Stretch%20Fit&start=0&sz=96

Feature Set No. 6 above. The Ultra Flex 3.0 – Right Away product is representative of Feature Set No. 7 above.

- **Exhibit D ('325 patent)** – This exhibit charts the asserted claims of the '325 patent against the following representative products: Ultra Flex 3.0 – Right Away (Style No. 232452), Summits – High Range (Style No. 232457), Glide-Step Pro (Style No. 232930), GO WALK Now – Sauntered (Style No. 216372). For purposes of the asserted claims, these products are representative of Feature Set Nos. 1-7 above.
- **Exhibit E ('101 patent)** – This exhibit charts the asserted claims of the '101 patent against the following representative products: Ultra Flex 3.0 – Right Away (Style No. 232452), Glide-Step Pro (Style No. 232930), GO WALK Now – Sauntered (Style No. 216372), Pollard – Wilfred (Style No. 205451), and Swift Fit Delson (Style No. 255101). For purposes of the asserted claims, the GO WALK Now – Sauntered product is representative of Feature Set No. 2 above. The Ultra Flex 3.0 – Right Away product is representative of Feature Set Nos. 2 and 7 above. Similarly, the Glide-Step Pro product is representative of Feature Set Nos. 3 and 4 above. The Pollard – Wilfred and Swift Fit Delson products are representative of Feature Set No. 5 above and Feature Set Nos. 5 and 6 above, respectively.
- **Exhibit F ('660 patent)** – This exhibit charts the asserted claims of the '660 patent ~~(which will issue from the allowed '414 application)~~ against the following representative products: Ultra Flex 3.0 – Right Away (Style No. 232452), Glide-Step Pro (Style No. 232930), GO WALK Now – Sauntered (Style No. 216372), Pollard – Wilfred (Style No. 205451), Swift Fit Delson (Style No. 255101), and Summits – High

Range (Style No. 232457). For purposes of the asserted claims, these products are representative of Feature Set Nos. 1-7 above.

- **Exhibit G ('D641 patent)** – This exhibit charts the asserted claim of the 'D641 patent against the following representative product: Summits – High Range (Style No. 232457). For purposes of the asserted claims, the product is representative of substantially similar looking models, including~~:~~ products branded Summits (including Dazzling Haze, Diamond Dream, SR - Enslee, and Key Pace variants), Ultra Flex 3.0, Max Cushioning Elite, Max Cushioning Elite 2.0, Max Cushioning Hyper Craze, Max Cushioning Premier 2.0, Arch Fit 2.0, GO WALK Arch Fit 2.0, GO WALK Flex, GO WALK 7 - Adel, GO GOLF Walk 5, GO WALK Joy, D'Lux Walker SR, D'Lux Walker SR, D'Lux Walker 2.0, Skech-Lite Pro Slip Resistant, Relaxed Fit: Breathe-Easy - Roll-With-Me, Relaxed Fit: Zenfield, Relaxed Fit: Expected, RF: Melson, On-the-GO Flex, Reggae Fest 2.0, Hillcrest, RF Work: Max Cushioning Elite, RF: Slade, GO RUN Consistent 2.0 - Endure, Delson 3.0, GO WALK Max, RF: Garner, RF: Slade, Arch Fit Orvan, Relaxed Fit: Parson, RF: Respected, RF: Craster, Garza, RF: Hasting, RF: Revolted, Tilido, McColl, and Arch Fit Motley, including at least Skechers Style Nos. 100439, 100593, 104288, 104319, 104379, 108127, 108141, 108144, 108151, 108156, 108172, 108175, 108208, 108209, 108246, 123085, 123110, 124279, 124566, 124568, 124569, 124625, 124626, 124627, 124641, 124820, 124822, 124823, 124828, 124835, 124836, 124879, 124915, 124916, 124963, 124975, 125219, 125222, 125228, 125310, 125315, 125525, 128571, 128572, 128615, 128627, 128905, 128924, 129281, 129283, 129505, 129606, 129611, 129616, 129630, 136541, 136542, 136543, 136548, 137210, 137290, 138182, 149568, 149591, 149707, 149708, 149709, 149710, 149711,

149712, 149808, 149817, 149937, 150012, 150016, 150030, 150031, 150032, 150066, 150110, 150118, 150123, 150127, 150183, 150190, 150191, 150192, 150238, 150239, 150250, 150447, 150450, 150458, 158698, 158820, 180016, 200171, 200205, 200206, 200211, 200213, 200214, 200215, 200217, 200231, 200234, 200281, 204804, 204806, 204809, 204810, 204839, 204847, 204866, 204871, 205046, 205056, 205067, 205167, 205183, 205192, 205198, 205201, 205202, 205204, 205210, 205212, 205217, 205218, 205237, 205249, 205256, 205351, 205466, 210546, 210596, 210604, 210606, 210609, 210636, 210650, 210792, 210802, 210803, 210810, 210811, 210828, 210830, 210839, 210840, 210846, 210863, 210864, 210882, 210889, 210890, 210891, 210910, 210956, 211077, 214082, 216258, 216259, 216278, 216279, 216324, 216410, 216411, 216491, 216496, 216505, 216510, 216600, 216601, 216641, 216648, 216773, 220313, 220347, 220389, 220510, 220701, 220839, 220909, 232405, 232446, 232450, 232451, 232452, 232454, 232455, 232456, 232457, 232458, 232459, 232460, 232462, 232463, 232464, 232465, 232466, 232469, 232900, 232928, 232932, 232962, 237445, 237450, 237563, 237769, 251022, 251027, 303800, 303801, 303803, 303820, 303822, 303824, 303825, 303828, 303842, 303919, 403833, 403837, 403844, 403889, 210606W, 303828L, 303919L, 403833L, 403844L.

These disclosures are based at least in part on HFL's present understanding of the meaning and scope of the claims of the patents-in-suit absent discovery. The claims also cover substantially similarly designed models, to the extent they exist. Discovery in this matter is ongoing and HFL's investigation regarding the grounds contained herein and other grounds of infringement continues. HFL has not yet obtained discovery. Further, HFL has not yet obtained 30(b)(6) deposition testimony on the Accused Products. This disclosure is given without prejudice to HFL's right to

amend or supplement this disclosure as additional facts are ascertained, analysis is made, research is completed, and claims are construed.

3. Disclosure Under P.R. 3-1(d)

HFL believes that each element of each asserted claim is literally present in the Accused Products. To the extent any element of any claim is not literally present in any Accused Functionality, HFL contends that each such element is present under the doctrine of equivalents. HFL reserves the right to supplement and/or amend its infringement contentions regarding the doctrine of equivalents in light of ongoing discovery and/or the Court's claim construction rulings.

4. Disclosure Under P.R. 3-1(e)

HFL asserts that the claims are entitled to the following priority dates:

- At least as early as November 12, 2009: Asserted claims of the '101 patent;
- At least as early as July 29, 2019: Asserted claims of the '006, '811, '096, '325, and '660 patents ~~(the latter of which will issue from the '414 application)~~; and
- At least as early as December 19, 2019: The 'D614 patent.

HFL reserves its right to amend the priority date of the Patents based on discovery in this case, including any discovery from third parties.

5. **Disclosure Under P.R. 3-1(f)**

HFL does not intend to rely on an assertion that its own apparatus, product, device, process, method, act, or other instrumentality practices the claimed inventions of the Asserted Patents.

Document Production Accompanying Disclosure

1. Disclosure Under P.R. 3-2(a)

HFL is not aware of any documents in its possession, custody, or control that describe the subject matter set forth by this Rule.

2. Disclosure Under P.R. 3-2(b)

HFL has produced ~~contemporaneously herewith~~ various documents related to the conception, reduction to practice, design, and development of each claimed invention created on or before their respective priority dates at the following bates ranges: HFL0007443 to HFL0007550.

3. Disclosure Under P.R. 3-2(c)

HFL has produced ~~contemporaneously herewith~~ a copy of the file histories of the patents-in-suit at the following bates ranges: HFL0000164 to HFL0007442.

CONCLUSION

Consistent with the Federal Rules of Civil Procedure and the local rules of this Court, HFL expressly reserves the right to supplement this disclosure, including the right to supplement its disclosure of asserted claims and infringement contentions, as discovery is ongoing and additional information regarding Skechers' acts of infringement are likely to be uncovered through the course of discovery.

Dated: July~~November~~ __~~10~~, 2026~~5~~

/s/

Ryan Dykal (60905 MO)
Eric Maurer (458100 DC)
BOIES SCHILLER FLEXNER LLP
1401 New York Ave NW
Washington, DC 20005
Telephone: 202-237-2727
Facsimile: 202-237-6131
rdykal@bsfllp.com
emaurer@bsfllp.com

David Boies (*pro hac vice*)
BOIES SCHILLER FLEXNER LLP
333 Main Street
Armonk, New York 10504
Telephone: 914-749-8201
dboies@bsfllp.com

Melissa R. Smith
Texas Bar No. 24001351
GILLAM & SMITH, LLP
303 South Washington Avenue
Marshall, Texas 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257
Email: melissa@gillamsmithlaw.com

Joshua Schiller (pro hac vice forthcoming)
BOIES SCHILLER FLEXNER LLP
55 Hudson Yards, 20th Floor
New York, New York 10001
Telephone: 212-446-2300
jjschiller@bsfllp.com

Attorneys for Plaintiffs HandsFree Labs Licensing, LLC, FAST IP, LLC, and Kizik Design, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel for Skechers was served on the below date by electronic mail.

Dated: July~~November~~ __~~10~~, 2026~~5~~

/s/
[Name]