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' 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 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. The 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 that exhibit various combinations of features including elements such as a sole, upper, and firm heel structure. An example model is depicted and 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.

[1] Currently, Skechers lists over 1,150 individual models on its website. *See* https://www.skechers.com/technologies/comfort-technologies/slip-ins/

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

Skechers currently categorizes 88 Hands Free Slip-ins products as featuring a Stretch Fit® upper, including e.g., Ultra Flex 3.0 variants such as Right Away.[2]

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.[3] Models with discrete tongues such as Glide-Step Pro feature elastic strips attached to the tongue as depicted below.

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

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

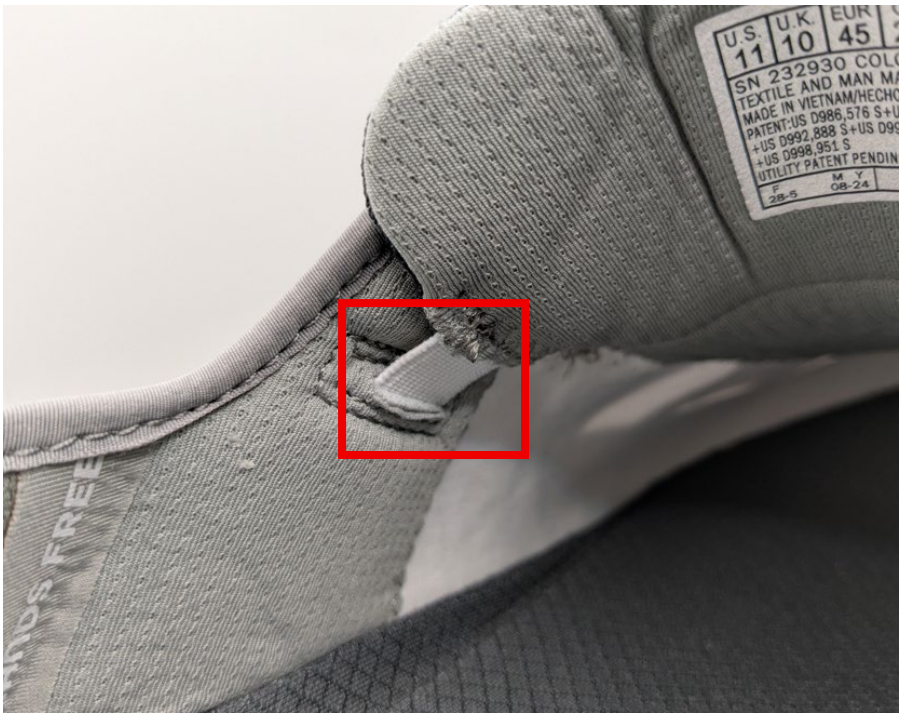

Photo of Glide-Step Pro lateral elastic element.

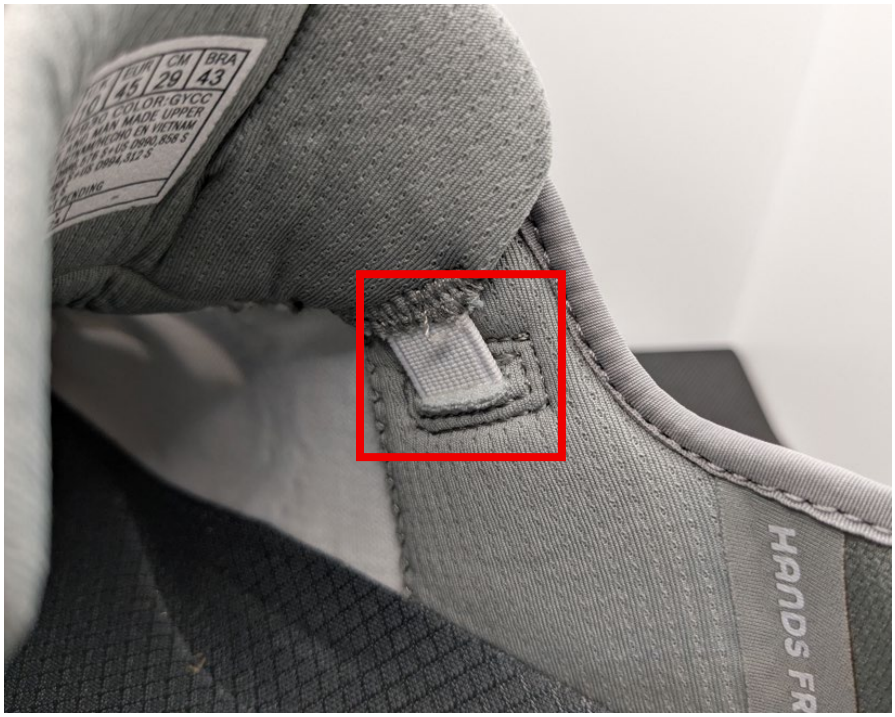

Photo of Glide-Step Pro medial elastic element.

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: Summits – High Range, Keepsakes Cozy Mid, Go Golf Elite 5, Work: Santoro, and Slade Ultra - Turner.
- **Feature Set No. 2:** 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.
- **Feature Set No. 3:** Max Cushioning Endeavor, Aero Burst, BOBS Skip Cute.
- **Feature Set No. 4:** 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.
- **Feature Set No. 5:** BOBS Skip Cute August Air, Easy Going Casual Icon, Mark Nason: Mako Julien, Pollard – Wilfred, and Swift Fit Equalizer 4.0.
- **Feature Set No. 6:** Swift Fit Delson, Bounder Brisk-Burst, BOBS Sport Squad

Chaos – Daily Glitz, BOBS Sport Squad Chaos, Bounder - Simple Cute, and Swift Fit Sneaker.

- **Feature Set No. 7:** Breathe-Easy - Home-Body, RF: Edgeride – Raygo, Ultra Flex 3.0 – Right Away.

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. No. 12,471,660 ("'660 patent"); and (7) U.S. Patent No. D1,037,641 ("'D641 patent").

HFL asserts that:

- at least Feature Set Nos. 2 and 7 variously infringe claim 1 of the '006 patent;
- at least Feature Set Nos. 2-7 variously infringe claims 1-10, and 12 of the '811 patent;
- at least Feature Set Nos. 4, 6 and 7 variously infringe claims 13-21, and 26-27 of the '096 patent;
- Each of Feature Set Nos. 1-7 variously infringe claims 1-9 of the '325 patent;
- at least Feature Set Nos. 2-7 variously infringe claims 7-12 and 16-18 of the '101 patent;
- Each of Feature Set Nos. 1-7 variously infringe claims 1-2, 6-9, 11-14, 16-17, and 19-21 of the '414 application, which will issue into the '660 patent; and
- the claim of the 'D641 patent is infringed as set forth below.

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

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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, GO WALK Now – Sauntered. 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[4]. 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, Pollard – Wilfred, Swift Fit Delson. 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, GO WALK Now – Sauntered. For purposes of the asserted claim, the products are representative of Feature Set No. 2 above, including Skechers' Hands Free Slip-ins

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

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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, Swift Fit Delson, Ultra Flex 3.0 – Right Away. 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 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, Summits – High Range, Glide-Step Pro, GO WALK Now – Sauntered. 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, Glide-Step Pro, GO WALK Now – Sauntered, Pollard – Wilfred, and Swift Fit Delson. 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

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representative products: Ultra Flex 3.0 – Right Away, Glide-Step Pro, GO WALK Now – Sauntered, Pollard – Wilfred, Swift Fit Delson, and Summits – High Range. 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. For purposes of the asserted claims, the product is representative of substantially similar looking models, including: 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.

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

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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.

<u>Document Production Accompanying Disclosure</u>

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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: November 10, 2025

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CERTIFICATE OF SERVICE

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

Dated: November 10, 2025

/s/ Ryan Dykal
Ryan Dykal

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