

	)	
	)	
MARMON FOODSERVICE	)	
TECHNOLOGIES, INC.,	)	
	)	
Plaintiff,	)	CIVIL ACTION NO. 4:25-cv-01491-ZTB
	)	
v.	)	JURY TRIAL REQUESTED
	)	
DUKE MANUFACTURING CO.,	)	
	)	
Defendant.	)	
	)	
	)	

Duke Manufacturing Co. – Exhibit 1059
Duke Manufacturing Co. v. Marmon Foodservice Technologies, Inc.
1 IPR2026-00406

**Local Patent R. 3-1 Disclosure of Asserted Claims and
Preliminary Infringement Contentions**

A. Asserted Claims (Local Patent R. 3-1(a)(i))

Plaintiff asserts that Duke infringes the following claims of each asserted utility patent:

U.S. Patent No. 9,976,750 (“the ’750 Patent”) – Claims 1-10

U.S. Patent No. 9,980,322 (“the ’322 Patent”) – Claims 1-10

U.S. Patent No. 10,492,641 (“the ’641 Patent”) – Claims 1-11, 13-24, 26-30, 32-34

U.S. Patent No. 10,512,363 (“the ’363 Patent”) – Claims 1-26, 28-33, 35-37

U.S. Patent No. 10,841,981 (“the ’981 Patent”) – Claims 1-29, 31-54, 56-66

U.S. Patent No. 10,852,002 (“the ’002 Patent”) – Claims 1-21, 23-29

U.S. Patent No. 11,771,264 (“the ’264 Patent”) – Claims 1-20

B. Accused Instrumentalities (Local Patent R. 3-1(a)(ii))

For each asserted claim set forth in Part A above, Plaintiff identifies the Accused Instrumentalities below as ones for which Plaintiff is aware, and product names, descriptions and model numbers currently available to Plaintiff. Plaintiff asserts that Defendant infringes each asserted claim by its manufacture, sale, offers for sale, import (if any), and use of each Accused Instrumentality in the United States:

Asserted Claim(s)	Accused Instrumentalities
'750 Patent – Claims 1-5	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34
'750 Patent – Claim 6	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23 with lid latch, RFHU-24 with lid latch, RFHU-34 with lid latch
'750 Patent – Claims 7-10	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34
'322 Patent – Claims 1-5	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34
'322 Patent – Claim 6	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23 with lid latch, RFHU-24 with lid latch, RFHU-34 with lid latch
'322 Patent – Claims 7-10	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34
'641 Patent – Claims 1-2	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34
'641 Patent – Claims 3-4	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23 with optional timer bar, RFHU-24 with optional timer bar, RFHU-34 with optional timer bar

'641 Patent – Claim 5	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23 with optional timer bar and lid latch, RFHU-24 with optional timer bar and lid latch, RFHU-34 with optional timer bar and lid latch
'641 Patent – Claims 6-9	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23 with optional timer bar, RFHU-24 with optional timer bar, RFHU-34 with optional timer bar
'641 Patent – Claim 10	Duke HS2 Models HS2-23 with front and rear timer bars, HS2-24 with front and rear timer bars, HS2-34 with front and rear timer bars Duke ReadyFlex Models RFHU-23 with optional front and rear timer bars, RFHU-24 with optional front and rear timer bars, RFHU-34 with optional front and rear timer bars
'641 Patent – Claim 11	Duke HS2 Models HS2-23, HS2-24, HS2-34 ReadyFlex Models RFHU-23 with lid latch, RFHU-24 with lid latch, RFHU-34 with lid latch
'641 Patent – Claim 13	Duke HS2 Models HS2-23, HS2-24, HS2-34 ReadyFlex Models RFHU-23 with lid latch, RFHU-24 with lid latch, RFHU-34 with lid latch
'641 Patent – Claims 14-21	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34
'641 Patent – Claims 22-23	Duke HS2 Models HS2-23, HS2-24, HS2-34

	ReadyFlex Models RFHU-23 with lid latch, RFHU-24 with lid latch, RFHU-34 with lid latch
'641 Patent – Claim 24	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34
'641 Patent – Claims 26-30	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34
'641 Patent – Claims 32-33	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34
'641 Patent – Claim 34	Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34
'363 Patent – Claims 1-3	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24, RFHU-34
'363 Patent – Claims 4-5	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24 with optional timer bar, RFHU-34 with optional timer bar
'363 Patent – Claim 6	Duke HS2 Models HS2-24, HS2-34 ReadyFlex Models RFHU-24 with optional timer bar and lid latch, RFHU-34 with optional timer bar and lid latch
'363 Patent – Claims 7-10	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24 with optional timer bar, RFHU-34 with optional timer bar
'363 Patent – Claim 11	Duke HS2 Models HS2-24 with front and rear timer bars, HS2-34 with front and rear timer bars

	Duke ReadyFlex Models RFHU-24 with optional front and rear timer bars, RFHU-34 with optional front and rear timer bars
'363 Patent – Claims 12-14	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24 with lid latch, RFHU-34 with lid latch
'363 Patent – Claims 15-23	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24, RFHU-34
'363 Patent – Claims 24-25	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24 with lid latch, RFHU-34 with lid latch
'363 Patent – Claim 26	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24, RFHU-34
'363 Patent – Claims 28-33	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24, RFHU-34
'363 Patent – Claims 35-36	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24, RFHU-34
'363 Patent – Claim 37	Duke ReadyFlex Models RFHU-24, RFHU-34
'981 Patent – Claim 1	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23 with optional timer bar, RFHU-24 with optional timer bar, RFHU-34 with optional timer bar
'981 Patent – Claim 2	Duke HS2 Models HS2-23, HS2-24, HS2-34

	Duke ReadyFlex Models RFHU-23 with optional timer bar and lid latch, RFHU-24 with optional timer bar and lid latch, RFHU-34 with optional timer bar and lid latch
'981 Patent – Claims 3-7	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23 with optional timer bar, RFHU-24 with optional timer bar, RFHU-34 with optional timer bar
'981 Patent – Claim 8	Duke HS2 Models HS2-23 with front and rear timer bars, HS2-24 with front and rear timer bars, HS2-34 with front and rear timer bars Duke ReadyFlex Models RFHU-23 with optional front and rear timer bars, RFHU-24 with optional front and rear timer bars, RFHU-34 with optional front and rear timer bars
'981 Patent – Claims 9-13	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23 with optional timer bar, RFHU-24 with optional timer bar, RFHU-34 with optional timer bar
'981 Patent – Claim 14	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23 with lid latch, RFHU-24 with lid latch, RFHU-34 with lid latch
'981 Patent – Claim 15	Duke HS2 Models HS2-23 Duke ReadyFlex Models RFHU-23 with lid latch

'981 Patent – Claims 16-17	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23 with lid latch, RFHU-24 with lid latch, RFHU-34 with lid latch
'981 Patent – Claims 18-19	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23 with optional timer bar and lid latch, RFHU-24 with optional timer bar and lid latch, RFHU-34 with optional timer bar and lid latch
'981 Patent – Claim 20	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23 with lid latch, RFHU-24 with lid latch, RFHU-34 with lid latch
'981 Patent – Claim 21	Duke HS2 Models HS2-23 with front and rear timer bars, HS2-24 with front and rear timer bars, HS2-34 with front and rear timer bars Duke ReadyFlex Models RFHU-23 with optional front and rear timer bars and lid latch, RFHU-24 with optional front and rear timer bars and lid latch, RFHU-34 with optional front and rear timer bars and lid latch
'981 Patent – Claims 22-26	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23 with lid latch, RFHU-24 with lid latch, RFHU-34 with lid latch
'981 Patent – Claim 27	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34

'981 Patent – Claim 28	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23 with lid latch, RFHU-24 with lid latch, RFHU-34 with lid latch
'981 Patent – Claim 29	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34
'981 Patent – Claims 31-32	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34
'981 Patent – Claims 33-34	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23 with optional timer bar, RFHU-24 with optional timer bar, RFHU-34 with optional timer bar
'981 Patent – Claim 35	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34
'981 Patent – Claim 36	Duke HS2 Models HS2-23 with front and rear timer bars, HS2-24 with front and rear timer bars, HS2-34 with front and rear timer bars Duke ReadyFlex Models RFHU-23 with optional front and rear timer bars, RFHU-24 with optional front and rear timer bars, RFHU-34 with optional front and rear timer bars
'981 Patent – Claims 37-44	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34

'981 Patent – Claims 45-46	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23 with optional timer bar, RFHU-24 with optional timer bar, RFHU-34 with optional timer bar
'981 Patent – Claims 47	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34
'981 Patent – Claim 48	Duke HS2 Models HS2-23 with front and rear timer bars, HS2-24 with front and rear timer bars, HS2-34 with front and rear timer bars Duke ReadyFlex Models RFHU-23 with optional front and rear timer bars, RFHU-24 with optional front and rear timer bars, RFHU-34 with optional front and rear timer bars
'981 Patent – Claims 49-54	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34
'981 Patent – Claims 56-57	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34
'981 Patent – Claims 58-59	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23 with optional timer bar, RFHU-24 with optional timer bar, RFHU-34 with optional timer bar
'981 Patent – Claim 60	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34

'981 Patent – Claim 61	Duke HS2 Models HS2-23 with front and rear timer bars, HS2-24 with front and rear timer bars, HS2-34 with front and rear timer bars Duke ReadyFlex Models RFHU-23 with optional front and rear timer bars, RFHU-24 with optional front and rear timer bars, RFHU-34 with optional front and rear timer bars
'981 Patent – Claims 62-66	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34
'002 Patent – Claim 1	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24 23 with optional timer bar, RFHU-34 23 with optional timer bar
'002 Patent – Claim 2	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24 23 with optional timer bar and lid latch, RFHU-34 23 with optional timer bar and lid latch
'002 Patent – Claims 3-4	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24 23 with optional timer bar, RFHU-34 23 with optional timer bar
'002 Patent – Claim 5	Duke HS2 Models HS2-24 with front and rear timer bars, HS2-34 with front and rear timer bars Duke ReadyFlex Models RFHU-24 with optional front and rear timer bars, RFHU-34 with optional front and rear timer bars

'002 Patent – Claims 6-15	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24, RFHU-34
'002 Patent – Claim 16	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24 23 with lid latch, RFHU-34 23 with lid latch
'002 Patent – Claims 17-19	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24, RFHU-34
'002 Patent – Claim 20	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24 with lid latch, RFHU-34 with lid latch
'002 Patent – Claim 21	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24, RFHU-34
'002 Patent – Claim 23	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24, RFHU-34
'002 Patent – Claim 24	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24 23 with lid latch, RFHU-34 23 with lid latch
'002 Patent – Claims 25-27	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24, RFHU-34
'002 Patent – Claim 28	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24 23 with lid latch, RFHU-34 23 with lid latch

'002 Patent – Claim 29	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24 23 with optional timer bar and lid latch, RFHU-34 23 with optional timer bar and lid latch
'264 Patent – Claims 1-2	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34
'264 Patent – Claims 3-4	Duke HS2 Model HS2-34 Duke ReadyFlex Model RFHU-34
'264 Patent – Claims 5-7	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34
'264 Patent – Claims 8-12	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24, RFHU-34
'264 Patent – Claims 13-15	Duke HS2 Models HS2-24, HS2-34 Duke ReadyFlex Models RFHU-24 with lid latch, RFHU-34 with lid latch
'264 Patent – Claims 16-19	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23, RFHU-24, RFHU-34
'264 Patent – Claim 20	Duke HS2 Models HS2-23, HS2-24, HS2-34 Duke ReadyFlex Models RFHU-23 with optional timer bar, RFHU-24 with optional timer bar, RFHU-34 with optional timer bar

C. Claim Charts (Local Patent R. 3-1(a)(iii, iv))

The charts provided as Exhibits 1A, 1B, 2A, 2B, 3A, 3B, 4A, 4B, 5A, 5B, 6A, 6B, 7A, and 7B identify specifically where each limitation of each asserted claim is found within each Accused Instrumentality. Each limitation is present literally. No limitation is a means-plus-function limitation governed by 35 U.S.C. § 112(f).

D. Indirect Infringement (Local Patent R. 3-1(a)(v))

Plaintiff asserts that each asserted claim also is indirectly infringed. For each such claim, direct infringement occurs at least when end-users of the Accused Instrumentalities (*e.g.*, restaurant operators) use the Accused Instrumentalities for their intended purposes.

Defendant induces such direct infringement of each asserted claim through, with knowledge of each patent-in-suit, providing end users with user manuals instructing use of the Accused Instrumentalities in a manner knowingly infringing each asserted claim, as set forth in the claim charts referenced above and attached hereto, the Duke documents cited therein, and the Duke documents produced herewith at production numbers MFT_0003479-0003706.

Defendant contributes to such direct infringement of each asserted claim through, with knowledge of each patent-in-suit, offering to sell or selling within the United States or importing into the United States a component of a patented machine, manufacture, combination or composition, or a material or apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in an infringement of such patent, and not a staple article or commodity of commerce suitable for substantial noninfringing use, including by selling in the United States and/or importing into the United States each of the Accused Instrumentalities, each Accused Instrumentality, as set forth

in the claim charts referenced above and attached hereto, being especially made for practicing a patented process and/or constituting a material part of the claimed inventions, and not a staple article or commodity of commerce suitable for substantial noninfringing use.

E. Priority (Local Patent R. 3-1(a)(vi))

The '750 Patent issued from Application No. 15/134,380, filed April 20, 2016. Each of the asserted claims of the '750 Patent is entitled to an application priority date of April 20, 2016.

The '322 Patent issued from Application No. 15/133,220, filed April 19, 2016. Each of the asserted claims of the '322 Patent is entitled to an application priority date of April 19, 2016.

The '641 Patent issued from Application No. 15/985,255, filed May 21, 2018, which was a continuation of Application No. 15/133,220, filed April 19, 2016. Each of the asserted claims of the '641 Patent is entitled to an application priority date of April 19, 2016.

The '363 Patent issued from Application No. 15/984,760, filed May 21, 2018, which was a continuation of Application No. 15/134,380, filed April 20, 2016. Each of the asserted claims of the '363 Patent is entitled to an application priority date of April 20, 2016.

The '981 Patent issued from Application No. 16/403,415, filed May 3, 2019, which was a continuation of Application No. 15/985,255, filed May 21, 2018, which was a continuation of Application No. 15/133,220, filed April 19, 2016. Each of the asserted claims of the '981 Patent is entitled to an application priority date of April 19, 2016.

The '002 Patent issued from Application No. 16/403,349, filed May 3, 2019, which was a continuation of Application No. 15/984,760, filed May 21, 2018, which was a continuation of Application No. 15/134,380, filed April 20, 2016. Each of the asserted claims of the '002 Patent is entitled to an application priority date of April 20, 2016.

The '264 Patent issued from Application No. 17/089,072, filed November 4, 2020, which was a continuation of Application No. 16/403,349, filed May 3, 2019, which was a continuation of Application No. 15/984,760, filed May 21, 2018, which was a continuation of Application No. 15/134,380, filed April 20, 2016. Each of the asserted claims of the '264 Patent is entitled to an application priority date of April 20, 2016.

E. Plaintiff's Practice of Asserted Claims (Local Patent R. 3-1(a)(vii))

Plaintiff asserts that the following products of Plaintiff, and use of such products, practices each asserted claim, as indicated below. Documents sufficient to show that each such product practices each such claim are produced herewith as production numbers MFT_0003707-0003822.

Asserted Claim(s)	Plaintiff's Products
'750 Patent – Claims 1-10	MFT Prince Castle Extended Holding Bin Models EHB23, EHB24, EHB34
'322 Patent – Claims 1-10	MFT Prince Castle Extended Holding Bin Models EHB23, EHB24, EHB34
'641 Patent – Claims 1-9	MFT Prince Castle Extended Holding Bin Models EHB23, EHB24, EHB34
'641 Patent – Claim 10	MFT Prince Castle Extended Holding Bin Models EHB23 with front and rear timer bars, EHB24 with front and rear timer bars, EHB34 with front and rear timer bars
'641 Patent – Claim 11	MFT Prince Castle Extended Holding Bin Models EHB23, EHB24, EHB34

'641 Patent – Claims 13-23	MFT Prince Castle Extended Holding Bin Models EHB23, EHB24, EHB34
'641 Patent – Claims 26-30	MFT Prince Castle Extended Holding Bin Models EHB23, EHB24, EHB34
'641 Patent – Claims 32-34	MFT Prince Castle Extended Holding Bin Models EHB23, EHB24, EHB34
'363 Patent – Claims 1-10	MFT Prince Castle Extended Holding Bin Models EHB24, EHB34
'363 Patent – Claim 11	MFT Prince Castle Extended Holding Bin Models EHB24 with front and rear timer bars, EHB34 with front and rear timer bars
'363 Patent – Claims 12-25	MFT Prince Castle Extended Holding Bin Models EHB24, EHB34
'363 Patent – Claims 28-33	MFT Prince Castle Extended Holding Bin Models EHB24, EHB34
'363 Patent – Claims 35-37	MFT Prince Castle Extended Holding Bin Models EHB24, EHB34
'981 Patent – Claims 1-7	MFT Prince Castle Extended Holding Bin Models EHB23, EHB24, EHB34
'981 Patent – Claim 8	MFT Prince Castle Extended Holding Bin Models EHB23 with front and rear timer bars, EHB24 with front and rear timer bars, EHB34 with front and rear timer bars

'981 Patent – Claims 9-14	MFT Prince Castle Extended Holding Bin Models EHB23, EHB24, EHB34
'981 Patent – Claim 15	MFT Prince Castle Extended Holding Bin Models EHB23
'981 Patent – Claims 16-20	MFT Prince Castle Extended Holding Bin Models EHB23, EHB24, EHB34
'981 Patent – Claim 21	MFT Prince Castle Extended Holding Bin Models EHB23 with front and rear timer bars, EHB24 with front and rear timer bars, EHB34 with front and rear timer bars
'981 Patent – Claims 22-28	MFT Prince Castle Extended Holding Bin Models EHB23, EHB24, EHB34
'981 Patent – Claims 31-35	MFT Prince Castle Extended Holding Bin Models EHB23, EHB24, EHB34
'981 Patent – Claim 36	MFT Prince Castle Extended Holding Bin Models EHB23 with front and rear timer bars, EHB24 with front and rear timer bars, EHB34 with front and rear timer bars
'981 Patent – Claims 37-47	MFT Prince Castle Extended Holding Bin Models EHB23, EHB24, EHB34
'981 Patent – Claim 48	MFT Prince Castle Extended Holding Bin Models EHB23 with front and rear timer bars, EHB24 with front and rear timer bars, EHB34 with front and rear timer bars
'981 Patent – Claims 49-54	MFT Prince Castle Extended Holding Bin Models EHB23, EHB24, EHB34

'981 Patent – Claims 56-60	MFT Prince Castle Extended Holding Bin Models EHB23, EHB24, EHB34
'981 Patent – Claim 61	MFT Prince Castle Extended Holding Bin Models EHB23 with front and rear timer bars, EHB24 with front and rear timer bars, EHB34 with front and rear timer bars
'981 Patent – Claims 62-66	MFT Prince Castle Extended Holding Bin Models EHB23, EHB24, EHB34
'002 Patent – Claims 1-4	MFT Prince Castle Extended Holding Bin Models EHB24, EHB34
'002 Patent – Claim 5	MFT Prince Castle Extended Holding Bin Models EHB24 with front and rear timer bars, EHB34 with front and rear timer bars
'002 Patent – Claims 6-21	MFT Prince Castle Extended Holding Bin Models EHB24, EHB34
'002 Patent – Claims 23-29	MFT Prince Castle Extended Holding Bin Models EHB24, EHB34
'264 Patent – Claims 1-2	MFT Prince Castle Extended Holding Bin Models EHB23, EHB24, EHB34
'264 Patent – Claims 3-4	MFT Prince Castle Extended Holding Bin Model EHB34
'264 Patent – Claims 5-7	MFT Prince Castle Extended Holding Bin Models EHB23, EHB24, EHB34
'264 Patent – Claims 8-15	MFT Prince Castle Extended Holding Bin Models EHB24, EHB34

'264 Patent – Claims 16-20	MFT Prince Castle Extended Holding Bin Models EHB23, EHB24, EHB34
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Local Patent R. 3-2 Document Production Accompanying Disclosure of Asserted Claims and Preliminary Infringement Contentions

A. Pre-Application Disclosures and Sales (Local Patent R. 3-2(a))

Plaintiff states that it discussed or disclosed the claimed inventions of the asserted claims to a third party prior to the application priority date of each asserted claim (as identified above). Documents evidencing such disclosure identified through a reasonable search are produced herewith as production numbers MFT_0003823-0004394.

Plaintiff states that products embodying the claimed inventions of the asserted claims were sold prior to the application priority date of each asserted claim (as identified above). Documents sufficient to evidence such sales are produced herewith as production numbers MFT_0004395-0004399.

B. Documents Evidencing Invention (Local Patent R. 3-2(b))

Documents evidencing the conception, reduction to practice, design, and development of the inventions of the asserted claims, and/or products that practice one or more of the asserted claims, created on or before the application priority date of each asserted claim (as identified above) and identified through a reasonable search, are produced herewith as production numbers MFT_0004400-0004885.

C. Prosecution File Histories (Local Patent R. 3-2(c))

Copies of the file histories for each of the seven utility patents and two design patents are produced herewith as production numbers MFT_0000143-0003368.

Date: September 24, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing was served by email on this 24th day of September, 2026, upon Defendant at the following email addresses of record:

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