

EXHIBIT 101-C

Invalidity Combinations Chart for U.S. Patent No. 12,458,101

The Asserted Claims of U.S. Patent No. 12,458,101 ("the '**101 Patent**') are rendered invalid under 35 U.S.C. §§ 102 and/or 103 by at least the following prior art references and products (collectively referred to as "references"), whether considered alone, or in any combination thereof:

Reference	Ex. No.
Japanese Pub. No. S64-8904 ("Aikawa")	101-14
Korean Pub. No. 2001-0105550 ("Baek")	101-5
Bikers (SN 21426)	101-20
Comfort / Serene / Lax (SN 4069)	101-21
Comfort / Balladeer / Tenor (SN 4177)	101-22
Comfort / Legends / Iliad (SN 4034)	101-23
Don Juans (SN 4104)	101-24
U.S. Pub. No. 2008/0313929 ("Hoyt")	101-25
U.S. Pat. No. 913,012 ("Jackson")	101-8
Japanese Utility Model 3153220 ("Kim")	101-6
U.S. Pat. No. 5,946,825 ("Koh")	101-19
Korean Pub. No. 10-2009-0093548 ("Lee")	101-4
U.S. Pat. No. 5,054,216 ("Lin-216")	101-13
U.S. Pat. No. 3,693,270 ("Murray")	101-15
U.S. Pub. No. 2002/0174568 ("Neiley")	101-11
U.S. Pat. No. 287,312 ("Packard")	101-7
U.S. Pat. No. 2,311,996 ("Parker")	101-17
U.S. Pat. No. 1,686,175 ("Read")	101-9
Complete Footwear Dictionary ("Rossi")	101-18
German Utility Model 29809404 ("Ruloff")	101-1
Netherlands Pub. No. NL2000762C1 ("Snijders")	101-26
WO 2009/089572 ("Somerville")	101-10
U.S. Pat. No. 4,608,769 ("Sturlaugson")	101-16
Japanese Pub. No. 2004-236860 ("Suminosuke")	101-2
Japanese Pub. No. H11-127907 ("Toyomo")	101-3
U.S. Pub. No. 2002/0066213 ("Wells")	101-12

Each of the foregoing prior art references anticipates the Asserted Claims of the '101 Patent under 35 U.S.C. § 102, expressly and/or inherently. Additionally and/or in the alternative, to the extent Plaintiffs allege that any particular prior art reference does not expressly or inherently disclose any

particular claim limitation, the prior art reference renders the Asserted Claims of the '101 Patent obvious under 35 U.S.C. § 103, including, for example and without limitation, based on the reference alone, or the reference in combination with any one or more of: (1) the knowledge of a person of ordinary skill in the art ("POSITA") at the time of the alleged invention; (2) any admitted prior art, as explained in the '101 Patent or discussed in its file history or in the file history of any related patent; (3) any of the prior art references identified in Skechers' Cover Pleading; (4) any of the prior art references charted for the claim limitation in any Skechers Invalidity Chart; and/or (5) any of the prior art references identified as disclosing the claim limitation in this Invalidity Combinations Chart for the '101 Patent. The combinations of prior art references that render the Asserted Claims of the '101 Patent obvious are readily determinable as so described, which is the most efficient way of disclosing the combinations in light of the facts that, among other things, Plaintiffs have asserted 57 claims across 7 patents, and Plaintiffs' Infringement Contentions are deficient in multiple respects including as described in Skechers' Cover Pleading.

A POSITA at the time of the alleged invention would have been motivated to combine any one or more of the foregoing references, with a reasonable expectation of success in doing so, including for at least the exemplary reasons described in Skechers' Cover Pleading and in Skechers' Invalidity Charts for each prior art reference. For example, a POSITA would have been motivated to combine any one or more of these references because such combination would have involved, for example and without limitation: (a) combining prior art elements according to known methods to yield predictable results; (b) simple substitution of one known element for another to obtain predictable results; (c) use of known techniques to improve similar devices (methods, or products) in the same way; (d) applying a known technique to a known device (method, or product) ready for improvement to yield predictable results; (e) applying an obvious to try combination by choosing from a finite number of identified, predictable solutions, with a reasonable expectation of success; (f) combining work from one field of endeavor that prompts variations of it for use in either the same field or a different one based on design incentives or other market forces that are predictable to a POSITA; and/or (g) applying some teaching suggestion, or motivation in the prior art that would have led one of ordinary skill to modify the prior art reference or to combine prior art reference teachings to arrive at the claimed invention.

The claims of the '101 Patent have not yet been construed. Skechers' Preliminary Invalidity Contentions, including this chart, are thus based in part on Plaintiffs' apparent claim construction positions that Plaintiffs have implied in their infringement contentions, to the extent such constructions are discernable. Skechers' Preliminary Invalidity Contentions thus may reflect alternative positions as to claim construction and scope, and comparisons of claim language to the prior art herein may be based on Plaintiffs' overbroad claim constructions and interpretations as implied in Plaintiffs' infringement contentions, which constructions and interpretations Skechers reserves the right to dispute. For example, Plaintiffs appear to incorrectly interpret numerous claim limitations in overbroad and sweeping ways in an attempt to read the claims on the Accused Products, which constructions if adopted would also make such claim limitations read on the prior art. By including prior art that anticipates or renders obvious claims based on Plaintiffs' apparent claim constructions or any other constructions, Skechers is not adopting Plaintiffs' claim constructions or any other constructions. Skechers' Preliminary Invalidity Contentions, including this chart, are made in a variety of alternatives and do not represent Skechers' agreement or view as to the meaning, definiteness, written description support for, or enablement of any claim or term. Further, to the extent that any of the prior art discloses the same or similar functionality or feature(s) of any of the Accused Products, Skechers reserves the right to argue that said feature or functionality does not practice any limitation of any of the asserted claims, and to argue, in the alternative, that if said feature or functionality is found to practice any limitation of any of the asserted claims, then the prior art reference teaches the limitation and that the claim is invalid.

This chart addresses the invalidity of the Asserted Claims of the '101 Patent, which includes claims 7-12 and 16-18. See Plaintiffs' Disclosure Of Asserted Claims And Infringement Contentions, at 7 (Nov. 10, 2025). Notwithstanding the scope of this chart, Skechers reserves the right to rely on the prior art reference(s) and product(s) discussed herein to establish the invalidity of all claims of the '101 Patent. Further, the citations herein are solely exemplary. Skechers' Preliminary Invalidity Contentions, including this chart, are intended to set forth Skechers' contentions, not all of the evidence that may support such contentions. For example, although Skechers has provided exemplary citations in this chart, Skechers reserves the right to rely on any and all portions of the prior art reference(s) discussed herein (in addition to the exemplary cited passages), and any and all evidence regarding the prior art product(s) discussed herein (in addition to the examples), to establish the invalidity of all claims of the '101 Patent. As a further example, to the extent this chart cites any figures, Skechers may rely upon any and all text relating to said figures, and to the extent this chart cites any text, Skechers may rely upon any and all figures that relate to said text. Similarly, citations provided for one claim limitation are expressly incorporated by reference into all other limitations for that claim as well as all limitations of all claims on which that claim depends. Skechers additionally reserves the right to rely on all prior art that is in any way identified herein and/or identified directly or indirectly in any documents cited herein, including all cited prior art printed publications, and all prior art products described in those printed publications, regardless of the semantic format of this chart. Moreover, Skechers will rely upon other evidence, including expert opinions and supporting documents and testimony.

In many instances, Plaintiffs' infringement contentions fail to provide adequate notice of how Plaintiffs are construing the claims and fail to comply with the Court's scheduled Lin-216g order and other rules. Skechers reserves the right to revise and supplement its Preliminary Invalidity Contentions, including this chart, to the extent Plaintiffs are permitted to revise or supplement their contentions or otherwise make their positions known. Further, Skechers reserves the right to revise and supplement its Preliminary Invalidity Contentions, including this chart, following claim construction.

Skechers' investigation of the prior art, including but not limited to the reference(s) discussed herein, is ongoing. Skechers has not yet completed discovery from Plaintiffs or third parties, who may have relevant information concerning the prior art. Skechers reserves the right to supplement its Preliminary Invalidity Contentions, including this chart, after additional discovery is received. Moreover, Skechers does not yet have the benefit of Plaintiffs' positions on the prior art, including what (if any) claim limitations it contends are missing in each prior art reference, whether Plaintiffs agree that a reference is in fact prior art, and whether Plaintiffs agree that a POSITA would have been motivated to combine specific references with a reasonable expectation of success in doing so. Skechers reserves the right to supplement its obviousness positions (including by identifying additional prior art combinations and the associated reasons to combine) as discovery in the case progresses, including expert discovery.

Nothing herein should be construed as an admission regarding infringement, claim construction, or the scope of any claim.

I. Claim 7

<u>Claim 7 of '101 Patent</u>	<u>Exemplary Citations to Claim Limitations Disclosed in the Prior Art References</u>
7. A rapid-entry shoe comprising:	The following references each disclose a rapid-entry shoe. <i>See, e.g.,</i> <u>Aikawa Trans.</u> p. 21, 23. <u>Baek Trans.</u> Abstract; p. 2; Claim 1. <u>Hoyt</u> at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; Abstract; ¶ 2; Claim 1. <u>Jackson</u> Figs. 1-4; 1:9-15, 1:42-108, 2:109-112, 3:1-16. <u>Kim Trans.</u> Abstract; ¶¶ 1, 13, 29. <u>Koh</u> Fig. 1; 2:58-67, 8:21-27. <u>Lee Trans.</u> Abstract; ¶¶ 4, 19. <u>Lin-216</u> 1:11-33. <u>Murray</u> Abstract; Claim 1; 1:4-46. <u>Neiley</u> at ¶¶ 8-9, 37, 78-79. <u>Packard</u> Figs. 1-2; 1:8-11, 1:22-57. <u>Parker</u> Fig. 1; p. 1, left col. ll. 1-4, p. 2, right col. ll. 27-36. <u>Read</u> 1:1-11. <u>Rossi</u> at 106, 167-168, 176, 213. <u>Ruloff Trans.</u> 3:20-26; 5:6-20. <u>Skechers Bikers</u> (SN 21426)

	<u>Skechers Comfort / Balladeer / Tenor</u> (SN 4177) <u>Skechers Comfort / Legends / Iliad</u> (SN 4034) <u>Skechers Comfort / Serene / Lax</u> (SN 4069) <u>Skechers Don Juans</u> (SN 4104) <u>Snijders</u> Fig. 1; <u>Snijders Trans</u> (HFL0005648, HFL0005652). <u>Somerville</u> 1:16-28, 6:4-15, 7:13-21. <u>Sturlaugson</u> Fig. 1; Abstract; 1:9-19, 2:42-44, 3:28-41. <u>Suminosuke Trans.</u> Abstract; ¶¶ 5, 14. <u>Tomoyo Trans.</u> ¶¶ 7, 54, 57. <u>Wells</u> at Abstract; ¶¶ 1, 10, 25, 37, 49, 53.
[7.1] an upper comprising a flexible material; and	The following references each disclose an upper comprising a flexible material. <i>See, e.g.,</i> <u>Aikawa Trans.</u> Figs. 2; p. 20. <u>Baek Trans.</u> Figs. 1, 2; p. 3; Claim 1. <u>Hoyt</u> at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; Abstract; ¶¶ 18-19, 22; Claim 1. <u>Jackson</u> Figs. 1-4; Claim 4; 1:42-108. <u>Kim Trans.</u> Figs. 3, 7; Claim 1; ¶¶ 7, 18, 37. <u>Koh</u> Fig. 1; 2:58-67, 3:1-7, 8:21-27. <u>Lee Trans.</u> Fig. 1; ¶¶ 5, 25. <u>Lin-216</u> Figs. 3, 5; 1:45-50, 2:29-32.

	<u>Murray</u> Fig. 1; 2:3-7. <u>Neiley</u> Figs. 1B, 3A, 3B, 5, 7, 8, 9; ¶¶ 7-9, 35, 38-39, 40-41, 43-44, 53, 55, 63-64, 66. <u>Packard</u> Fig. 1; 1:22-31, 1:58-67. <u>Parker</u> Fig. 1; p. 1, left column, ll. 45-52; p. 1, left column, l. 53-right column, l. 16. <u>Read</u> Figs. 1, 2; 1:28-42. <u>Rossi</u> 14, 15, 18, 53, 54, 59-60, 71, 73, 76, 119, 146, 167-68, 178, 194, 213. <u>Ruloff Trans.</u> 12:2-22. <u>Skechers Bikers</u> (SN 21426) <u>Skechers Comfort / Balladeer / Tenor</u> (SN 4177) <u>Skechers Comfort / Legends / Iliad</u> (SN 4034) <u>Skechers Comfort / Serene / Lax</u> (SN 4069) <u>Skechers Don Juans</u> (SN 4104) <u>Snijders</u> Figs. 1, 2, 4; <u>Snijders Trans</u> (HFL0005648-51). <u>Somerville</u> Figs. 1, 10; 1:20-25, 3:18-20, 6:4-15, 9:19-24. <u>Sturlaugson</u> Figs. 1, 2, 6; Claim 1; 1:65-2:22, 3:42-45, 4:43-64. <u>Suminosuke Trans.</u> Figs. 1, 3; ¶¶ 10, 11. <u>Tomoyo Trans.</u> Figs. 1-4, 7, 8, 10; ¶¶ 2, 24-25, 26-28, 32. <u>Wells</u> at Figs. 1, 2, 7; ¶¶ 25, 37, 42, 43, 47.
[7.2] a heel structure provided in a rear portion	The following references each disclose a heel structure provided in a rear portion of the rapid-entry shoe. <i>See, e.g.,</i>

of the rapid-entry shoe, the heel structure comprising:

Aikawa Trans. Figs. 1-5, 7-9, 12-18; Claims 1, 2, 5, 7; p. 20-23.

Baek Trans. Fig. 1; p. 3; Claim 1.

Hoyt at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; Abstract; ¶¶ 2, 4-7, 11-12, 14-16, 18-19, 22-23; Claims 1-6.

Jackson Figs. 1-4.

Kim Trans. Figs. 4, 6; Abstract; Claim 1; ¶¶ 7, 13, 22, 24, 31.

Koh Fig. 4; Claim 11; 6:6-29.

Lee Trans. Figs. 3, 4; Claim 1; ¶¶ 14, 25-26.

Lin-216 Figs. 5, 6; ¶ 18.

Murray Fig. 1.

Neiley Claims 3, 4, 20, 24; Figs. 3A, 4, 6, 8, 9, 12-15; ¶¶ 35, 53, 57, 61, 63-64, 66, 72-74.

Packard Figs. 1, 2.

Parker Fig. 1; p. 1, right col. ll. 38-44.

Read Figs. 1, 2; 1:43-51, 2:34-47.

Rossi 41-42, 84, 175.

Ruloff Trans. Fig. 3; 4:11-15; 9:15-19.

Skechers Bikers (SN 21426)

Skechers Comfort / Balladeer / Tenor (SN 4177)

Skechers Comfort / Legends / Iliad (SN 4034)

Skechers Comfort / Serene / Lax (SN 4069)

Skechers Don Juans (SN 4104)

	<u>Snijders</u> Figs. 1-3; <u>Snijders Trans</u> (HFL0005648-51). <u>Somerville</u> Figs. 1, 4; Abstract; 2:13-20, 6:4-15; Claim 1. <u>Sturlaugson</u> Figs. 1, 2, 4; Claim 1; 3:42-45, 3:53-4:9; 5:20-30. <u>Suminosuke Trans.</u> Figs. 1, 3, 4; Claim 1; ¶¶ 6, 10, 11. <u>Tomoyo Trans.</u> Figs. 3, 4; Claim 1; ¶¶ 5, 35. <u>Wells</u> Figs. 1, 2, 4, 5, 7; Abstract, Claim 1; ¶¶ 25-26, 36, 37, 44-45, 47.
[7.3] a lower portion coupled to a sole of the rapid-entry shoe and extending completely around the rear portion;	The following references each disclose a lower portion coupled to a sole of the rapid-entry shoe and extending completely around the rear portion. <i>See, e.g.,</i> <u>Aikawa Trans.</u> Figs. 1-4, 17-18; Claim 1; p. 20-23. <u>Baek Trans.</u> Figs. 1, 3; Claim 1; p. 3. <u>Hoyt</u> at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; ¶¶ 17-18, 21-22; Claims 1, 4, 6. <u>Jackson</u> Figs. 1-4. <u>Kim Trans.</u> Figs. 3, 4, 7; ¶¶ 24, 28. <u>Koh</u> Fig. 4. <u>Lee Trans.</u> Fig. 3; ¶¶ 25, 27. <u>Lin-216</u> Fig. 1, 3; 3:4-9, 4:10-51. <u>Murray</u> Fig. 1. <u>Neiley</u> Claims 3, 4, 20, 24; Figs. 3A, 4, 6, 8, 9, 12-15; ¶¶ 35, 53, 57, 61, 63-64, 66, 72-74. <u>Packard</u> Figs. 1, 2.

	<u>Parker</u> Fig. 1. <u>Read</u> Figs. 1, 2; 1:43-51. <u>Rossi</u> 84. <u>Ruloff Trans.</u> Figs. 3, 4; 4:11-15; 4:23-5:2; 5:21-6:1; 9:15-19; 13:21-14:3. <u>Skechers Bikers</u> (SN 21426) <u>Skechers Comfort / Balladeer / Tenor</u> (SN 4177) <u>Skechers Comfort / Legends / Iliad</u> (SN 4034) <u>Skechers Comfort / Serene / Lax</u> (SN 4069) <u>Skechers Don Juans</u> (SN 4104) <u>Snijders</u> Figs. 1-3; <u>Snijders Trans</u> (HFL0005648-51). <u>Somerville</u> Fig. 10; 9:26-30; Claim 9. <u>Sturlaugson</u> Figs. 1, 2, 4; 2:46-52, 3:53-4:9, 5:20-30. <u>Suminosuke Trans.</u> Fig. 1, 3, 4; ¶¶ 6, 10, 11. <u>Tomoyo Trans.</u> Figs. 2, 4; ¶¶ 21, 25. <u>Wells</u> Figs. 1, 2, 4, 4b, 5, 7; Abstract, Claims 1, 2, 3; ¶¶ 25-27, 36-37, 38, 41, 44-45, 47.
[7.4] a midportion integrally formed with, and extending from, the lower portion such that the midportion and the lower portion form a single continuous piece and define abutting and non-overlapping regions, the	The following references each disclose a midportion integrally formed with, and extending from, the lower portion such that the midportion and the lower portion form a single continuous piece and define abutting and non-overlapping regions, the midportion extending completely around the rear portion. <i>See, e.g.,</i> <u>Aikawa Trans.</u> Figs. 1-4, 17-18; Claim 1; p. 20-23.

midportion extending completely around the rear portion; and	<u>Baek Trans.</u> Figs. 1, 3; p. 3. <u>Hoyt</u> at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; ¶¶ 17-18, 21-22; Claims 1, 4, 6. <u>Kim Trans.</u> Figs. 3, 4, 7. <u>Koh</u> Fig. 4. <u>Lee Trans.</u> Figs. 3, 4. <u>Lin-216</u> Figs. 1, 3. <u>Murray</u> Fig. 1. <u>Neiley</u> Claims 3, 4, 20, 24; Figs. 3A, 4, 6, 8, 9, 12-15; ¶¶ 35, 53, 57, 61, 63-64, 66, 72-74. <u>Packard</u> Figs. 1, 2. <u>Parker</u> Fig. 1. <u>Read</u> Figs. 1, 2. <u>Rossi</u> 41-42, 84, 175. <u>Ruloff Trans.</u> Fig. 1. <u>Skechers Bikers</u> (SN 21426) <u>Skechers Comfort / Balladeer / Tenor</u> (SN 4177) <u>Skechers Comfort / Legends / Iliad</u> (SN 4034) <u>Skechers Comfort / Serene / Lax</u> (SN 4069) <u>Skechers Don Juans</u> (SN 4104) <u>Snijders</u> Figs. 1-3; <u>Snijders Trans</u> (HFL0005648-51). <u>Somerville</u> Fig. 10; 9:26-30.
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	<u>Sturlaugson</u> Figs. 2, 4; 2:46-52, 3:53-4:9, 5:20-30. <u>Suminosuke Trans.</u> Figs. 1, 3, 4; ¶¶ 6, 10, 11. <u>Tomoyo Trans.</u> Figs. 2, 8; ¶¶ 21, 25. <u>Wells</u> Figs. 1, 2, 4, 4b, 5, 7; Abstract, Claims 1, 2, 3; ¶¶ 25-27, 36-37, 38, 41, 44-45, 47.
[7.5] an upper portion extending from the midportion and extending further rearward than the midportion wherein the upper portion directs a foot into an opening of the rapid-entry shoe;	The following references each disclose an upper portion extending from the midportion and extending further rearward than the midportion wherein the upper portion directs a foot into an opening of the rapid-entry shoe. <i>See, e.g.,</i> <u>Aikawa Trans.</u> Figs. 7-9, 12-16; Claim 2; p. 21-22. <u>Baek Trans.</u> Abstract; Fig. 2; Claim 1; p. 3. <u>Hoyt</u> at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; Abstract; ¶¶ 2, 4-7, 11-12, 14-16, 18-19, 22-23; Claims 1-6. <u>Jackson</u> Figs. 1-4. <u>Kim Trans.</u> Figs. 3, 4, 7; Abstract; Claim 1; ¶¶ 7, 13, 16, 26. <u>Lin-216</u> Figs. 4, 5; 3:10-35, 4:10-51. <u>Neiley</u> Claims 3, 4, 20, 24; Figs. 3A, 4, 6, 8, 9, 12-15; ¶¶ 35, 53, 57, 61, 63-64, 66, 72-74. <u>Rossi</u> at 41-42, 84, 175. <u>Ruloff Trans.</u> Figs. 1, 4; 10:4-13. <u>Skechers Bikers</u> (SN 21426) <u>Skechers Comfort / Balladeer / Tenor</u> (SN 4177) <u>Skechers Comfort / Legends / Iliad</u> (SN 4034) <u>Skechers Comfort / Serene / Lax</u> (SN 4069)

	<u>Skechers Don Juans</u> (SN 4104) <u>Snijders</u> Figs. 1-3; <u>Snijders Trans</u> (HFL0005648-51). <u>Sturlaugson</u> Figs. 2, 4; 2:42-63, 3:53-4:9, 5:20-30. <u>Suminosuke Trans.</u> Fig. 1, 3; ¶¶ 6, 10, 11. <u>Tomoyo Trans.</u> Figs. 2, 8. <u>Wells</u> 1, 2, 4, 4b, 5, 7; Abstract, Claims 1, 2, 3; ¶¶ 25-27, 36-37, 38, 41, 44-45, 47.
[7.6] wherein at least a portion of the rapid-entry shoe is lowered and is pivoted about an axis in response to the foot applying a pressure to the upper portion when the foot is inserted into the opening of the rapid-entry shoe; and	The following references each disclose that at least a portion of the rapid-entry shoe is lowered and is pivoted about an axis in response to the foot applying a pressure to the upper portion when the foot is inserted into the opening of the rapid-entry shoe. <i>See, e.g.,</i> <u>Aikawa Trans.</u> Figs. 7-9, 12-16; Claim 2; p. 21-22. <u>Baek Trans.</u> Abstract; Figs. 2, 3; Claim 1; p. 2, 3. <u>Hoyt</u> at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; Abstract; ¶¶ 2, 4-7, 11-12, 14-16, 18-19, 22-23; Claims 1-6. <u>Kim Trans.</u> Fig. 3; ¶¶ 8, 23, 29. <u>Lee Trans.</u> Figs. 4, 5; ¶ 37. <u>Lin-216</u> Figs. 4, 5; 3:10-35. <u>Neiley</u> Claims 3, 4, 20, 24; Figs. 3A, 4, 6, 8, 9, 12-15; ¶¶ 35, 53, 57, 61, 63-64, 66, 72-74. <u>Rossi</u> 65. <u>Ruloff Trans.</u> Fig. 4; 2:18-26; 4:23-5:2; 5:21-6:1; 6:26-7:8; 13:21-14:3. <u>Skechers Bikers</u> (SN 21426)

	<u>Skechers Comfort / Balladeer / Tenor</u> (SN 4177) <u>Skechers Comfort / Legends / Iliad</u> (SN 4034) <u>Skechers Comfort / Serene / Lax</u> (SN 4069) <u>Skechers Don Juans</u> (SN 4104) <u>Snijders</u> Figs. 3, 4; <u>Snijders Trans</u> (HFL0005648, HFL0005651). <u>Somerville</u> Figs. 1, 3b, 6, 7; 2:22-24, 6:4-15, 6:17-24. <u>Sturlaugson</u> Figs. 2, 4; 2:46-52, 3:53-4:9, 5:20-30. <u>Suminosuke Trans.</u> Figs. 1, 3, 4; ¶¶ 6, 8, 11. <u>Tomoyo Trans.</u> Figs. 2, 8; Abstract; Claim 1; ¶¶ 5, 8, 10. <u>Wells</u> Figs. 1, 2; ¶¶ 37, 42, 43, 47.
[7.7] wherein the flexible material is expanded in response to the foot applying the pressure to the upper portion when the foot is inserted into the opening of the rapid-entry shoe.	The following references each disclose that the flexible material is expanded in response to the foot applying the pressure to the upper portion when the foot is inserted into the opening of the rapid-entry shoe. <i>See, e.g.,</i> <u>Baek Trans.</u> Figs. 2, 3; pp. 2, 3. <u>Hoyt</u> at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; Abstract; ¶¶ 2, 4-7, 11-12, 14-16, 18-19, 22-23; Claims 1-6. <u>Jackson</u> Figs. 1, 4; 1:42-108, 1:109-2:16. <u>Kim Trans.</u> Fig. 7; ¶¶ 8, 15, 29. <u>Lee Trans.</u> Fig. 1; ¶ 5. <u>Lin-216</u> Figs. 3, 5; 2:44-59, 3:10-35. <u>Neiley</u> Figs. 1B, 3A, 3B, 5, 7, 8, 9; Claim 4; ¶¶ 7-9, 35, 38-39, 40-41, 43-44, 53, 55, 63-64, 66.

Packard Fig. 1; 1:22-31.

Parker Fig. 1; p. 1, left column, ll. 45-52; p. 1, left column, l. 53-right column, l. 16.

Read Figs. 2, 4; 1:12-18, 1:110-2:5.

Rossi 73.

Ruloff Trans. 2:8-12; 2:18-26; 9:1-11.

Skechers Bikers (SN 21426)

Skechers Comfort / Balladeer / Tenor (SN 4177)

Skechers Comfort / Legends / Iliad (SN 4034)

Skechers Comfort / Serene / Lax (SN 4069)

Skechers Don Juans (SN 4104)

Snijders Figs. 1, 2, 4; Snijders Trans (HFL0005648-51).

Somerville Fig. 10; 9:19-24; Claim 8.

Sturlaugson Fig. 6; 1:65-2:22, 4:43-64.

Suminosuke Trans. Fig. 1-3; ¶¶ 10, 11.

Tomoyo Trans. Figs. 1-4, 7, 8, 10; ¶¶ 24-25, 26-28, 32.

Wells Fig. 1; ¶ 25.

II. Claim 8

<u>Claim 8 of '101 Patent</u>	<u>Exemplary Citations to Claim Limitations Disclosed in the Prior Art References</u>
8. The rapid-entry shoe of claim 7, further comprising a slit provided in the upper, wherein the flexible material is provided in the slit.	The following references each disclose the rapid-entry shoe of claim 7, further comprising a slit provided in the upper, wherein the flexible material is provided in the slit. <i>See, e.g.,</i> <u>Baek Trans.</u> Figs. 2, 3; pp. 2, 3. <u>Jackson</u> Figs. 1, 4; 1:42-108, 1:109-2:16. <u>Kim Trans.</u> Figs. 3, 4; Claim 1; ¶¶ 7, 15, 25, 34. <u>Lee Trans.</u> Fig. 1; ¶ 5. <u>Neiley</u> Figs. 1B, 3A, 3B, 5, 7, 8, 9; ¶¶ 7-9, 35, 38-39, 40-41, 43-44, 53, 55, 63-64, 66. <u>Packard</u> Fig. 1; 1:22-31. <u>Parker</u> Fig. 1; p. 1, left column, ll. 45-52; p. 1, left column, l. 53-right column, l. 16. <u>Rossi</u> 73. <u>Ruloff Trans.</u> 10:14-11:15; 14:4-9. <u>Skechers Bikers</u> (SN 21426) <u>Skechers Comfort / Balladeer / Tenor</u> (SN 4177) <u>Skechers Comfort / Legends / Iliad</u> (SN 4034) <u>Skechers Comfort / Serene / Lax</u> (SN 4069) <u>Skechers Don Juans</u> (SN 4104) <u>Snijders</u> Figs. 1, 2; <u>Snijders Trans</u> (HFL0005648-50).

	<u>Somerville</u> Fig. 10; 9:19-24; Claim 8. <u>Sturlaugson</u> Fig. 6; 1:65-2:22, 4:43-64. <u>Suminosuke Trans.</u> Fig. 3; ¶ 11. <u>Tomoyo Trans.</u> Figs. 1-4, 7, 8, 10; ¶¶ 24-25, 26-28, 32. <u>Wells</u> Fig. 1; ¶ 25.
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III. Claim 9

<u>Claim 9 of '101 Patent</u>	<u>Exemplary Citations to Claim Limitations Disclosed in the Prior Art References</u>
9. The rapid-entry shoe of claim 7, wherein the heel structure at least partially surrounds the rear portion of the rapid-entry shoe.	The following references each disclose the rapid-entry shoe of claim 7, wherein the heel structure at least partially surrounds the rear portion of the rapid-entry shoe. <i>See, e.g.,</i> <u>Aikawa Trans.</u> Figs. 1-5, 7-9, 12-18; Claims 1, 2, 5, 7; p. 20-23. <u>Baek Trans.</u> Fig. 1; p. 3; Claim 1. <u>Hoyt</u> at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; Abstract; ¶¶ 2, 4-7, 11-12, 14-16, 18-19, 22-23; Claims 1-6. <u>Jackson</u> Figs. 1-4. <u>Kim Trans.</u> Figs. 2, 3, 4, 7; ¶ 24. <u>Koh</u> Fig. 4. <u>Lee Trans.</u> Figs. 3, 5; Claim 1; ¶¶ 14, 25-27. <u>Lin-216</u> Figs. 3, 5; 2:44-59, 3:10-35. <u>Murray</u> Fig. 1. <u>Neiley</u> Claims 3, 4, 20, 24; Figs. 3A, 4, 6, 8, 9, 12-15; ¶¶ 35, 53, 57, 61, 63-64, 66, 72-74. <u>Packard</u> Figs. 1, 2. <u>Parker</u> Fig. 1. <u>Read</u> Figs. 1, 2; 1:43-51. <u>Rossi</u> 41-42, 84, 175. <u>Ruloff Trans.</u> Figs. 3, 4.

	<u>Skechers Bikers</u> (SN 21426) <u>Skechers Comfort / Balladeer / Tenor</u> (SN 4177) <u>Skechers Comfort / Legends / Iliad</u> (SN 4034) <u>Skechers Comfort / Serene / Lax</u> (SN 4069) <u>Skechers Don Juans</u> (SN 4104) <u>Snijders</u> Figs. 1-3; <u>Snijders Trans</u> (HFL0005648-51). <u>Somerville</u> Figs. 1, 4; Abstract; 2:13-20, 6:4-15. <u>Sturlaugson</u> Figs. 1, 2, 4; 2:46-52, 3:53-4:9, 5:20-30. <u>Suminosuke Trans.</u> Figs. 1, 3, 4; Claim 1; ¶¶ 6, 11. <u>Tomoyo Trans.</u> Fig. 3; Claim 1; ¶ 5. <u>Wells</u> Figs. 1, 2, 4, 4b, 5, 7; Abstract, Claims 1, 2, 3; ¶¶ 25-27, 36-37, 38, 41, 44-45, 47.
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IV. Claim 10

<u>Claim 10 of '101 Patent</u>	<u>Exemplary Citations to Claim Limitations Disclosed in the Prior Art References</u>
10. The rapid-entry shoe of claim 7, further comprising a shoe cushioning component provided on at least a portion of the heel structure.	The following references each disclose the rapid-entry shoe of claim 7, further comprising a shoe cushioning component provided on at least a portion of the heel structure. <i>See, e.g.,</i> <u>Aikawa Trans.</u> Fig. 4; p. 21. <u>Baek Trans.</u> p. 3. <u>Hoyt</u> at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; Abstract; ¶¶ 2, 4-7, 11-12, 14-16, 18-19, 22-23; Claims 1-6. <u>Kim Trans.</u> Fig. 2; Claim 3; ¶¶ 10, 27. <u>Koh</u> Fig. 4; Claim 11; 7:9-27. <u>Lee Trans.</u> ¶ 27. <u>Lin-216</u> 3:44-53. <u>Murray</u> Abstract, Figs. 1, 3, 6; Claim 1; 1:4-46, 2:53-64. <u>Neiley</u> Figs. 11A-E; ¶¶ 38-39, 58, 70. <u>Read</u> 1:43-51. <u>Rossi</u> 3, 85, 86, 90, 194. <u>Skechers Bikers</u> (SN 21426) <u>Skechers Comfort / Balladeer / Tenor</u> (SN 4177) <u>Skechers Comfort / Legends / Iliad</u> (SN 4034) <u>Skechers Comfort / Serene / Lax</u> (SN 4069)

	<u>Skechers Don Juans</u> (SN 4104) <u>Snijders</u> Fig. 6; <u>Snijders Trans</u> (HFL0005651-52). <u>Sturlaugson</u> Fig. 4; 3:53-4:9. <u>Tomoyo Trans.</u> ¶ 2.
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V. Claim 11

<u>Claim 11 of '101 Patent</u>	<u>Exemplary Citations to Claim Limitations Disclosed in the Prior Art References</u>
11. The rapid-entry shoe of claim 7, wherein the axis is proximal to the sole of the rapid-entry shoe.	The following references each disclose the rapid-entry shoe of claim 7, wherein the axis is proximal to the sole of the rapid-entry shoe. <i>See, e.g.,</i> <u>Baek Trans.</u> Abstract; Figs. 2, 3; Claim 1; p. 3. <u>Hoyt</u> at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; Abstract; ¶¶ 2, 4-7, 11-12, 14-16, 17-19, 21-23; Claims 1-6. <u>Kim Trans.</u> Fig. 3; ¶¶ 8, 23, 29. <u>Lee Trans.</u> Figs. 4, 5; ¶¶ 14, 31. <u>Lin-216</u> Figs. 4, 5; 3:10-35. <u>Neiley</u> Claims 3, 4, 20, 24; Figs. 3A, 4, 6, 8, 9, 12-15; ¶¶ 35, 53, 57, 61, 63-64, 66, 72-74. <u>Read</u> Figs. 1, 2; 1:52-64. <u>Rossi</u> 65. <u>Ruloff Trans.</u> Fig. 4; 4:23-5:2; 5:21-6:1; 13:21-14:3. <u>Skechers Bikers</u> (SN 21426) <u>Skechers Comfort / Balladeer / Tenor</u> (SN 4177) <u>Skechers Comfort / Legends / Iliad</u> (SN 4034) <u>Skechers Comfort / Serene / Lax</u> (SN 4069) <u>Skechers Don Juans</u> (SN 4104) <u>Snijders</u> Figs. 3, 4; <u>Snijders Trans</u> (HFL0005648, HFL0005651).

	<u>Somerville</u> Figs. 6, 7. <u>Sturlaugson</u> Figs. 2, 4; 2:46-52, 3:53-4:9, 5:20-30. <u>Suminosuke Trans.</u> Figs. 1, 3, 4; Claim 1; ¶¶ 6, 10, 11. <u>Tomoyo Trans.</u> Figs. 2, 8; Abstract; Claim 1; ¶¶ 5, 8, 10. <u>Wells</u> Figs. 1, 2; ¶¶ 37, 42, 43, 47
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VI. Claim 12

<u>Claim 12 of '101 Patent</u>	<u>Exemplary Citations to Claim Limitations Disclosed in the Prior Art References</u>
12. The rapid-entry shoe of claim 7, wherein the pressure being applied to the upper portion causes at least a portion of the heel structure to move down and back.	The following references each disclose the rapid-entry shoe of claim 7, wherein the pressure being applied to the upper portion causes at least a portion of the heel structure to move down and back. <i>See, e.g.,</i> <u>Aikawa Trans.</u> Figs. 7-9, 12-16; Claim 2; p. 21-22. <u>Baek Trans.</u> Abstract; Figs. 2, 3; Claim 1; p. 2, 3. <u>Hoyt</u> at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; Abstract; ¶¶ 2, 4-7, 11-12, 14-16, 18-19, 22-23; Claims 1-6. <u>Kim Trans.</u> Fig. 3; ¶¶ 8, 23, 29. <u>Lee Trans.</u> Figs. 4, 5; ¶ 37. <u>Lin-216</u> Fig. 4; 3:10-35. <u>Neiley</u> Claims 3, 4, 20, 24; Figs. 3A, 4, 6, 8, 9, 12-15; ¶¶ 35, 53, 57, 61, 63-64, 66, 72-74. <u>Read</u> Figs. 2, 4; 1:12-18, 1:110-2:5. <u>Ruloff Trans.</u> Fig. 4; 2:18-26; 4:23-5:2; 5:21-6:1; 6:26-7:8; 13:21-14:3. <u>Skechers Bikers</u> (SN 21426) <u>Skechers Comfort / Balladeer / Tenor</u> (SN 4177) <u>Skechers Comfort / Legends / Iliad</u> (SN 4034) <u>Skechers Comfort / Serene / Lax</u> (SN 4069) <u>Skechers Don Juans</u> (SN 4104) <u>Snijders</u> Figs. 3, 4; <u>Snijders Trans</u> (HFL0005648, HFL0005651).

	<u>Somerville</u> Figs. 1, 3b; 2:22-24, 6:4-15. <u>Sturlaugson</u> Figs. 2, 4; 2:46-52, 3:53-4:9, 5:20-30. <u>Suminosuke Trans.</u> Figs. 1, 3, 4; ¶¶ 6, 8, 11. <u>Tomoyo Trans.</u> Figs. 2, 8; ¶ 41. <u>Wells</u> Figs. 1, 2; ¶¶ 37, 42, 43, 47.
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VII. Claim 16

<u>Claim 16 of '101 Patent</u>	<u>Exemplary Citations to Claim Limitations Disclosed in the Prior Art References</u>
16. A rapid-entry shoe, comprising:	The following references each disclose a rapid-entry shoe. <i>See, e.g.,</i> <u>Aikawa Trans.</u> p. 21, 23. <u>Baek Trans.</u> Abstract; p. 2; Claim 1. <u>Hoyt</u> at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; Abstract; ¶ 2; Claim 1. <u>Jackson</u> Figs. 1-4; 1:9-15, 1:42-108, 2:109-112, 3:1-16. <u>Kim Trans.</u> Abstract; ¶¶ 1, 13, 29. <u>Koh</u> Fig. 1; 2:58-67, 8:21-27. <u>Lee Trans.</u> Abstract; ¶¶ 4, 19. <u>Lin-216</u> 1:11-33. <u>Murray</u> Abstract; Claim 1; 1:4-46. <u>Neiley</u> ¶¶ 8-9, 37, 78-79. <u>Packard</u> Figs. 1-2; 1:8-11, 1:22-57. <u>Parker</u> Fig. 1; p. 1, left col. ll. 1-4, p. 2, right col. ll. 27-36. <u>Read</u> 1:1-11. <u>Rossi</u> at 106, 167-168, 176, 213. <u>Ruloff Trans.</u> 3:20-26; 5:6-20. <u>Skechers Bikers</u> (SN 21426)

	<u>Skechers Comfort / Balladeer / Tenor</u> (SN 4177) <u>Skechers Comfort / Legends / Iliad</u> (SN 4034) <u>Skechers Comfort / Serene / Lax</u> (SN 4069) <u>Skechers Don Juans</u> (SN 4104) <u>Snijders</u> Fig. 1; <u>Snijders Trans</u> (HFL0005648, HFL0005652). <u>Somerville</u> 1:16-28, 6:4-15, 7:13-21. <u>Sturlaugson</u> Fig. 1; Abstract; 1:9-19, 2:42-44, 3:28-41. <u>Suminosuke Trans.</u> Abstract; ¶¶ 5, 14. <u>Tomoyo Trans.</u> ¶¶ 7, 54, 57. <u>Wells</u> at Abstract; ¶¶ 1, 10, 25, 37, 49, 53.
[16.1] a sole;	The following references each disclose a sole. <i>See, e.g.,</i> <u>Aikawa Trans.</u> Figs. 2, 3; p. 20. <u>Baek Trans.</u> Fig. 2, 3; p. 3. <u>Hoyt</u> at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; ¶¶ 17-18, 21-22; Claims 1, 4, 6. <u>Jackson</u> Figs. 1-4; 1:42-108. <u>Kim Trans.</u> Figs. 3, 4, 7; ¶¶ 7, 22, 23. <u>Koh</u> Fig. 1; 2:58-67, 3:1-7, 8:21-27. <u>Lee Trans.</u> Figs. 3, 4; ¶ 24. <u>Lin-216</u> Figs. 3, 5; 2:29-32, 4:10-51.

	<u>Murray</u> Fig. 1; 2:3-7. <u>Neiley</u> Fig. 8; ¶ 35. <u>Packard</u> Figs. 1-2; 1:22-31, 1:58-67. <u>Parker</u> Fig. 1; p. 1, right col. ll. 38-44. <u>Read</u> Figs. 1, 2; 1:28-42, 1:110-2:5. <u>Rossi</u> at 123, 170. <u>Ruloff Trans.</u> Figs. 1, 4; 4:11-15; 4:23-5:2; 8:5-21; 12:2-22. <u>Skechers Bikers</u> (SN 21426) <u>Skechers Comfort / Balladeer / Tenor</u> (SN 4177) <u>Skechers Comfort / Legends / Iliad</u> (SN 4034) <u>Skechers Comfort / Serene / Lax</u> (SN 4069) <u>Skechers Don Juans</u> (SN 4104) <u>Snijders</u> Fig. 1; <u>Snijders Trans</u> (HFL0005648, 50). <u>Somerville</u> Figs. 1, 10; Abstract; 2:3-11, 3:18-20, 6:4-15, 9:4-14, 10:23-24; Claims 1, 12. <u>Sturlaugson</u> Figs. 1, 2; Claim 1; 3:42-45. <u>Suminosuke Trans.</u> Figs. 1, 2; Claim 1; ¶¶ 8, 10. <u>Tomoyo Trans.</u> Figs. 2, 4, 8; ¶¶ 16, 57. <u>Wells</u> Fig. 1; ¶ 25
[16.2] an upper comprising a flexible material and	The following references each disclose an upper comprising a flexible material and defining an opening of the rapid-entry shoe.

defining an opening of the rapid-entry shoe;

See, e.g.,

Aikawa Trans. Figs. 2; p. 20.

Baek Trans. Figs. 1, 2; p. 3; Claim 1.

Hoyt at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; Abstract; ¶¶ 18-19, 22; Claim 1.

Jackson Figs. 1-4; Claim 4; 1:42-108.

Kim Trans. Figs. 3, 7; Claim 1; ¶¶ 7, 18, 37.

Koh Fig. 1; 2:58-67, 3:1-7, 8:21-27.

Lee Trans. Fig. 1; ¶¶ 5, 25.

Lin-216 Figs. 3, 5; 1:45-50, 2:29-32.

Murray Fig. 1; 2:3-7.

Neiley Figs. 1B, 3A, 3B, 5, 7, 8, 9; ¶¶ 7-9, 35, 38-39, 40-41, 43-44, 53, 55, 63-64, 66.

Packard Fig. 1; 1:22-31, 1:58-67.

Parker Fig. 1; p. 1, left column, ll. 45-52; p. 1, left column, l. 53-right column, l. 16.

Read Figs. 1, 2; 1:28-42.

Rossi 14, 15, 18, 53, 54, 59-60, 71, 73, 76, 119, 146, 167-68, 178, 194, 213.

Ruloff Trans. Fig. 3; 2:4-7; 3:1-8; 12:2-22.

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Skechers Comfort / Serene / Lax (SN 4069)

	<u>Skechers Don Juans</u> (SN 4104) <u>Snijders</u> Figs. 1, 2, 4; <u>Snijders Trans</u> (HFL0005648-51). <u>Somerville</u> Figs. 1, 10; 1:20-25, 3:18-20, 6:4-15, 9:19-24. <u>Sturlaugson</u> Figs. 1, 2, 6; Claim 1; 1:65-2:22, 3:42-45, 4:43-64. <u>Suminosuke Trans.</u> Figs. 1, 3; ¶¶ 10, 11. <u>Tomoyo Trans.</u> Figs. 1-4, 7, 8, 10; ¶¶ 24-25, 26-28, 32. <u>Wells</u> Figs. 1, 2, 7; ¶¶ 25, 37, 42, 43, 47.
[16.3] a heel structure disposed at a rear portion of the rapid-entry shoe and extending from the sole, the heel structure comprising:	The following references each disclose a heel structure disposed at a rear portion of the rapid-entry shoe and extending from the sole, the heel structure comprising. <i>See, e.g.,</i> <u>Aikawa Trans.</u> Figs. 1-5, 7-9, 12-18; Claims 1, 2, 5, 7; p. 20-23. <u>Baek Trans.</u> Fig. 1; p. 3; Claim 1. <u>Hoyt</u> at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; Abstract; ¶¶ 2, 4-7, 11-12, 14-16, 18, 22; Claims 1, 3, 6. <u>Jackson</u> Figs. 1-4. <u>Kim Trans.</u> Figs. 4, 6; Abstract; Claim 1; ¶¶ 7, 13, 22, 24, 31. <u>Koh</u> Fig. 4; Claim 11; 6:6-29. <u>Lee Trans.</u> Figs. 3, 4; Claim 1; ¶¶ 14, 25-26. <u>Lin-216</u> Figs. 3, 5; 2:44-59, 3:10-35. <u>Murray</u> Fig. 1. <u>Neiley</u> Claims 3, 4, 20, 24; Figs. 3A, 4, 6, 8, 9, 12-15; ¶¶ 35, 53, 57, 61, 63-64, 66, 72-74.

	<u>Packard</u> Figs. 1, 2. <u>Parker</u> Fig. 1; p. 1, right col. ll. 38-44. <u>Read</u> Figs. 1, 2; 1:43-51, 2:34-47. <u>Rossi</u> 41-42, 84, 175. <u>Ruloff Trans.</u> Figs. 1, 3; 4:11-15; 9:15-19; 12:2-22. <u>Skechers Bikers</u> (SN 21426) <u>Skechers Comfort / Balladeer / Tenor</u> (SN 4177) <u>Skechers Comfort / Legends / Iliad</u> (SN 4034) <u>Skechers Comfort / Serene / Lax</u> (SN 4069) <u>Skechers Don Juans</u> (SN 4104) <u>Snijders</u> Figs. 1-3; <u>Snijders Trans</u> (HFL0005648-51). <u>Somerville</u> Figs. 1, 4; Abstract; 2:13-20, 6:4-15; Claim 1. <u>Sturlaugson</u> Figs. 1, 2, 4; Claim 1; 3:42-45, 3:53-4:9. <u>Suminosuke Trans.</u> Figs. 1, 3, 4; Claim 1; ¶¶ 6, 10, 11. <u>Tomoyo Trans.</u> Figs. 3, 4; Claim 1; ¶¶ 5, 35. <u>Wells</u> Figs. 1, 2, 4, 5, 7; Abstract, Claim 1; ¶¶ 25-26, 36, 37, 44-45, 47.
[16.4] a first portion coupled to the sole and extending around the rear portion of the rapid-entry shoe between a medial side of the rapid-entry shoe and	The following references each disclose a first portion coupled to the sole and extending around the rear portion of the rapid-entry shoe between a medial side of the rapid-entry shoe and a lateral side of the rapid-entry shoe. <i>See, e.g.,</i> <u>Aikawa Trans.</u> Figs. 1-4, 17-18; Claim 1; p. 20-23.

a lateral side of the rapid-entry shoe;

Baek Trans. Figs. 1, 3; p. 3.

Hoyt at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; ¶¶ 17-18, 21-22; Claims 1, 4, 6.

Jackson Figs. 1-4.

Kim Trans. Figs. 3, 4, 7; ¶¶ 24, 28.

Koh Fig. 4.

Lee Trans. Fig. 3; ¶¶ 25, 27.

Lin-216 Figs. 1, 3; 3:4-9, 4:10-51.

Murray Fig. 1.

Packard Figs. 1, 2.

Parker Fig. 1.

Read Figs. 1, 2; 1:43-51.

Rossi 84.

Ruloff Trans. Figs. 3, 4; 4:11-15; 4:23-5:2; 5:21-6:1; 9:15-19; 13:21-14:3.

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Skechers Comfort / Serene / Lax (SN 4069)

Skechers Don Juans (SN 4104)

Snijders Figs. 1-3; Snijders Trans (HFL0005648-51).

Somerville Fig. 10; 9:26-30; Claim 9.

	<u>Sturlaugson</u> Figs. 1, 2, 4; 2:46-52, 3:53-4:9, 5:20-30. <u>Suminosuke Trans.</u> Figs. 1, 3, 4; ¶¶ 6, 10, 11. <u>Tomoyo Trans.</u> Figs. 2, 4; ¶¶ 21, 25. <u>Wells</u> Figs. 1, 2, 4, 5, 7; Abstract, Claim 1; ¶¶ 25-26, 36, 37, 44-45, 47.
[16.5] a second portion contiguous with, and extending upward from, the first portion, wherein a transition between the first portion and the second portion defines a continuous and non-overlapping profile; and	The following references each disclose a second portion contiguous with, and extending upward from, the first portion, wherein a transition between the first portion and the second portion defines a continuous and non-overlapping profile. <i>See, e.g.,</i> <u>Aikawa Trans.</u> Figs. 1-4, 17-18; Claim 1; p. 20-23. <u>Baek Trans.</u> Figs. 1, 3; p. 3. <u>Hoyt</u> at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; Abstract; ¶¶ 2, 4-7, 11-12, 14-16, 17-19, 21-23; Claims 1-6. <u>Jackson</u> Figs. 1-4. <u>Kim Trans.</u> Figs. 3, 4, 7. <u>Koh</u> Fig. 4. <u>Lee Trans.</u> Figs. 3, 4. <u>Lin-216</u> Figs. 1, 3. <u>Murray</u> Fig. 1. <u>Neiley</u> Claims 3, 4, 20, 24; Figs. 3A, 4, 6, 8, 9, 12-15; ¶¶ 35, 53, 57, 61, 63-64, 66, 72-74. <u>Packard</u> Figs. 1, 2. <u>Parker</u> Fig. 1.

	<u>Read</u> Figs. 1, 2. <u>Rossi</u> 41-42, 84, 175. <u>Ruloff Trans.</u> Fig. 1. <u>Skechers Bikers</u> (SN 21426) <u>Skechers Comfort / Balladeer / Tenor</u> (SN 4177) <u>Skechers Comfort / Legends / Iliad</u> (SN 4034) <u>Skechers Comfort / Serene / Lax</u> (SN 4069) <u>Skechers Don Juans</u> (SN 4104) <u>Snijders</u> Figs. 1-3; <u>Snijders Trans</u> (HFL0005648-51). <u>Somerville</u> Fig. 10; 9:26-30. <u>Sturlaugson</u> Figs. 2, 4; 2:46-52, 3:53-4:9, 5:20-30. <u>Suminosuke Trans.</u> Figs. 1, 3, 4; ¶¶ 6, 10, 11. <u>Tomoyo Trans.</u> Figs. 2, 8. <u>Wells</u> Figs. 1, 2, 4, 5, 7; Abstract, Claim 1; ¶¶ 25-26, 36, 37, 44-45, 47.
[16.6] a third portion extending upward from the second portion and extending rearward to an extent greater than the second portion, the third portion allowing the heel structure to at least partially move downward or pivot about an axis of	The following references each disclose a third portion extending upward from the second portion and extending rearward to an extent greater than the second portion, the third portion allowing the heel structure to at least partially move downward or pivot about an axis of rotation proximal to the sole in response to a foot being inserted into the opening of the rapid-entry shoe. <i>See, e.g.,</i> <u>Aikawa Trans.</u> Figs. 7-9, 12-16; Claim 2; p. 21-22. <u>Baek Trans.</u> Figs. 2, 3; p. 2, 3.

rotation proximal to the sole in response to a foot being inserted into the opening of the rapid-entry shoe;	<u>Hoyt</u> at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; Abstract; ¶¶ 2, 4-7, 11-12, 14-16, 17-19, 21-23; Claims 1-6. <u>Kim Trans.</u> Figs. 3, 4, 7; Abstract; Claim 1; ¶¶ 7, 13, 16, 23, 26. <u>Lee Trans.</u> Figs. 4, 5; ¶ 37. <u>Lin-216</u> Figs. 4, 5; 3:10-35, 4:10-51. <u>Neiley</u> Claims 3, 4, 20, 24; Figs. 3A, 4, 6, 8, 9, 12-15; ¶¶ 35, 53, 57, 61, 63-64, 66, 72-74. <u>Rossi</u> at 41-42, 65, 84, 175. <u>Ruloff Trans.</u> Figs. 1, 4; 2:18-26; 4:23-5:2; 5:21-6:1; 6:26-7:8; 10:4-13; 13:21-14:3. <u>Skechers Bikers</u> (SN 21426) <u>Skechers Comfort / Balladeer / Tenor</u> (SN 4177) <u>Skechers Comfort / Legends / Iliad</u> (SN 4034) <u>Skechers Comfort / Serene / Lax</u> (SN 4069) <u>Skechers Don Juans</u> (SN 4104) <u>Snijders</u> Figs. 1-3; <u>Snijders Trans</u> (HFL0005648-51). <u>Somerville</u> Fig. 10; 9:19-24; Claim 8. <u>Sturlaugson</u> Figs. 2, 4; 2:42-63, 3:53-4:9, 5:20-30. <u>Suminosuke Trans.</u> Figs. 1, 3, 4; ¶¶ 6, 8, 10, 11. <u>Tomoyo Trans.</u> Figs. 2, 8; Abstract; Claim 1; ¶¶ 5, 8, 10. <u>Wells</u> Figs. 1, 2, 4, 5, 7; Abstract, Claim 1; ¶¶ 25-26, 36, 37, 42, 43, 44, 45, 47.
[16.7] wherein the flexible material transitions from a non-expanded state to an	The following references each disclose that the flexible material transitions from a non-expanded state to an expanded state in response to the foot being inserted into the opening of the rapid-entry shoe.

expanded state in response to the foot being inserted into the opening of the rapid-entry shoe.

See, e.g.,

Baek Trans. Figs. 2, 3; pp. 2, 3.

Hoyt at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; Abstract; ¶¶ 2, 4-7, 11-12, 14-16, 18-19, 22-23; Claims 1-6.

Jackson Figs. 1, 4; 1:42-108, 1:109-2:16.

Kim Trans. Fig. 7; ¶¶ 8, 15, 29.

Lee Trans. Fig. 1; ¶ 5.

Lin-216 Figs. 3, 5; 2:44-59, 3:10-35.

Neiley Figs. 1B, 3A, 3B, 5, 7, 8, 9; Claim 4; ¶¶ 7-9, 35, 38-39, 40-41, 43-44, 53, 55, 63-64, 66.

Packard Fig. 1; 1:22-31.

Parker Fig. 1; p. 1, left column, ll. 45-52; p. 1, left column, l. 53-right column, l. 16.

Rossi 73.

Ruloff Trans. 2:8-12; 2:18-26; 9:1-11.

Skechers Bikers (SN 21426)

Skechers Comfort / Balladeer / Tenor (SN 4177)

Skechers Comfort / Legends / Iliad (SN 4034)

Skechers Comfort / Serene / Lax (SN 4069)

Skechers Don Juans (SN 4104)

Snijders Figs. 1, 2, 4; Snijders Trans (HFL0005648-51).

Sturlaugson Fig. 6; 1:65-2:22, 4:43-64.

Suminosuke Trans. Fig. 1-3; ¶¶ 10, 11.

	<u>Tomoyo Trans.</u> Figs. 1-4, 7, 8, 10; ¶¶ 2, 24-25, 26-28, 32. <u>Wells</u> Figs. 1, 2, 7; ¶¶ 25, 37, 42, 43, 47.
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VIII. Claim 17

<u>Claim 17 of '101 Patent</u>	<u>Exemplary Citations to Claim Limitations Disclosed in the Prior Art References</u>
17. The rapid-entry shoe of claim 16, wherein the flexible material forms at least a portion of a topLin-216e of the rapid-entry shoe.	The following references each disclose the rapid-entry shoe of claim 16, wherein the flexible material forms at least a portion of a topLin-216e of the rapid-entry shoe. <i>See, e.g.,</i> <u>Aikawa Trans.</u> Figs. 2; p. 20. <u>Baek Trans.</u> Figs. 1, 2; p. 3; Claim 1. <u>Hoyt</u> at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; Abstract; ¶¶ 2, 4-7, 11-12, 14-16, 18-19, 22-23; Claims 1-6. <u>Kim Trans.</u> Figs. 3, 4, 7; Claim 1; ¶¶ 7, 18, 37. <u>Koh</u> Fig. 1; 2:58-67, 3:1-7, 8:21-27. <u>Lee Trans.</u> Fig. 1; ¶ 5. <u>Lin-216</u> Fig. 3; 1:45-50, 2:29-32. <u>Murray</u> Fig. 1; 2:3-7. <u>Neiley</u> Figs. 1B, 3A, 3B, 5, 7, 8, 9; ¶¶ 7-9, 35, 38-39, 40-41, 43-44, 53, 55, 63-64, 66. <u>Packard</u> Fig. 1; 1:22-31. <u>Parker</u> Fig. 1; p. 1, left column, ll. 45-52; p. 1, left column, l. 53-right column, l. 16. <u>Read</u> Figs. 1, 2; 1:28-42. <u>Rossi</u> 73. <u>Skechers Bikers</u> (SN 21426) <u>Skechers Comfort / Balladeer / Tenor</u> (SN 4177)

	<u>Skechers Comfort / Legends / Iliad</u> (SN 4034) <u>Skechers Comfort / Serene / Lax</u> (SN 4069) <u>Skechers Don Juans</u> (SN 4104) <u>Snijders</u> Figs. 1, 2, 4; <u>Snijders Trans</u> (HFL0005648-51). <u>Somerville</u> Fig. 10; 9:19-24; Claim 8. <u>Sturlaugson</u> Fig. 6; 1:65-2:22, 4:43-64. <u>Suminosuke Trans.</u> Fig. 3; ¶ 11. <u>Tomoyo Trans.</u> Figs. 1-4, 7, 8, 10; ¶¶ 2, 24-25, 26-28, 32. <u>Wells</u> Figs. 1, 2, 7; ¶¶ 25, 37, 42, 43, 47.
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IX. Claim 18

<u>Claim 18 of '101 Patent</u>	<u>Exemplary Citations to Claim Limitations Disclosed in the Prior Art References</u>
18. The rapid-entry shoe of claim 16, wherein a downward force being applied to the third portion causes at least a portion of the heel structure to move down and back.	The following references each disclose the rapid-entry shoe of claim 16, wherein a downward force being applied to the third portion causes at least a portion of the heel structure to move down and back. <i>See, e.g.,</i> <u>Aikawa Trans.</u> Figs. 7-9, 12-16; Claim 2; p. 21-22. <u>Baek Trans.</u> Figs. 2, 3; p. 3. <u>Hoyt</u> at Figs. 1, 2A, 2B, 2C, 3A, 3B, 3C, 3D; Abstract; ¶¶ 2, 4-7, 11-12, 14-16, 18-19, 22-23; Claims 1-6. <u>Kim Trans.</u> Fig. 3; ¶¶ 8, 23, 29. <u>Lee Trans.</u> Figs. 4, 5; ¶ 37. <u>Lin-216</u> Fig. 4; 3:10-35. <u>Neiley</u> Claims 3, 4, 20, 24; Figs. 3A, 4, 6, 8, 9, 12-15; ¶¶ 35, 53, 57, 61, 63-64, 66, 72-74. <u>Read</u> Figs. 2, 4; 1:12-18, 1:110-2:5. <u>Ruloff Trans.</u> Fig. 4; 2:18-26; 4:23-5:2; 5:21-6:1; 6:26-7:8; 13:21-14:3. <u>Skechers Bikers</u> (SN 21426) <u>Skechers Comfort / Balladeer / Tenor</u> (SN 4177) <u>Skechers Comfort / Legends / Iliad</u> (SN 4034) <u>Skechers Comfort / Serene / Lax</u> (SN 4069) <u>Skechers Don Juans</u> (SN 4104) <u>Snijders</u> Figs. 3, 4; <u>Snijders Trans</u> (HFL0005648, HFL0005651).

	<u>Somerville</u> Figs. 1, 3b; 2:22-24, 6:4-15. <u>Sturlaugson</u> Figs. 2, 4; 2:46-52, 3:53-4:9, 5:20-30. <u>Suminosuke Trans.</u> Figs. 1, 3, 4; ¶¶ 6, 8, 11. <u>Tomoyo Trans.</u> Figs. 2, 8; ¶ 41. <u>Wells</u> 1, 2; ¶¶ 37, 42, 43, 47
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