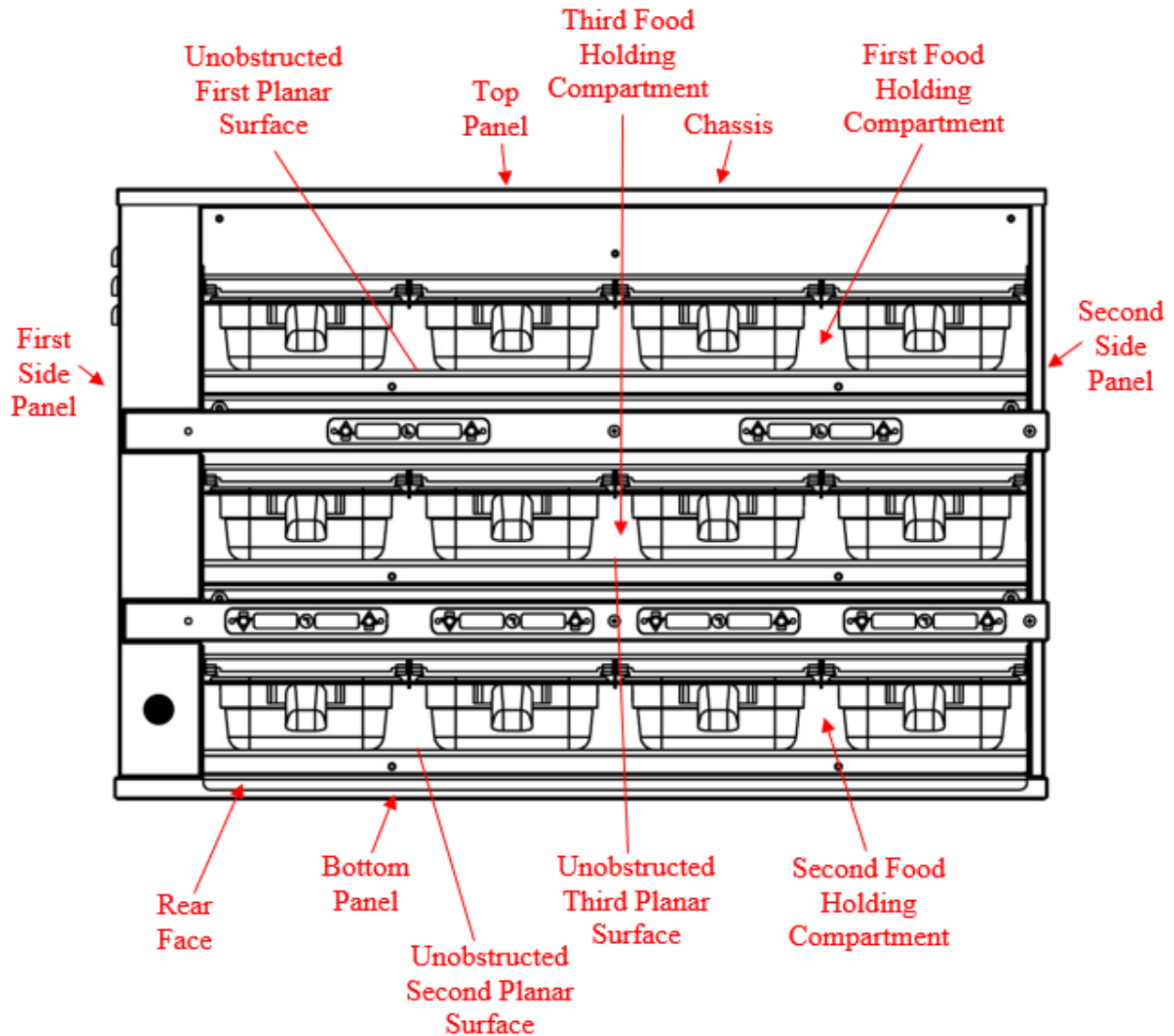




EX1005: 9 (modified-rear).

XIII. GROUND 10: Claims 1-10, 12-17 and 20 are Obvious Over Fortmann'748, IRHS Documents, Jones, Fortmann'197, McMillan, Vaseloff, Hartfelder, Shei'099, Stanger, Loy, and/or Veltrop

A. Fortmann'748 Modifications

1. 2x4/3x4 Configurations

Fortmann'748's cabinet (10) warms food trays (100). EX1010: ¶¶[0002], [0014]-[0015]; EX1003: ¶¶521-523.

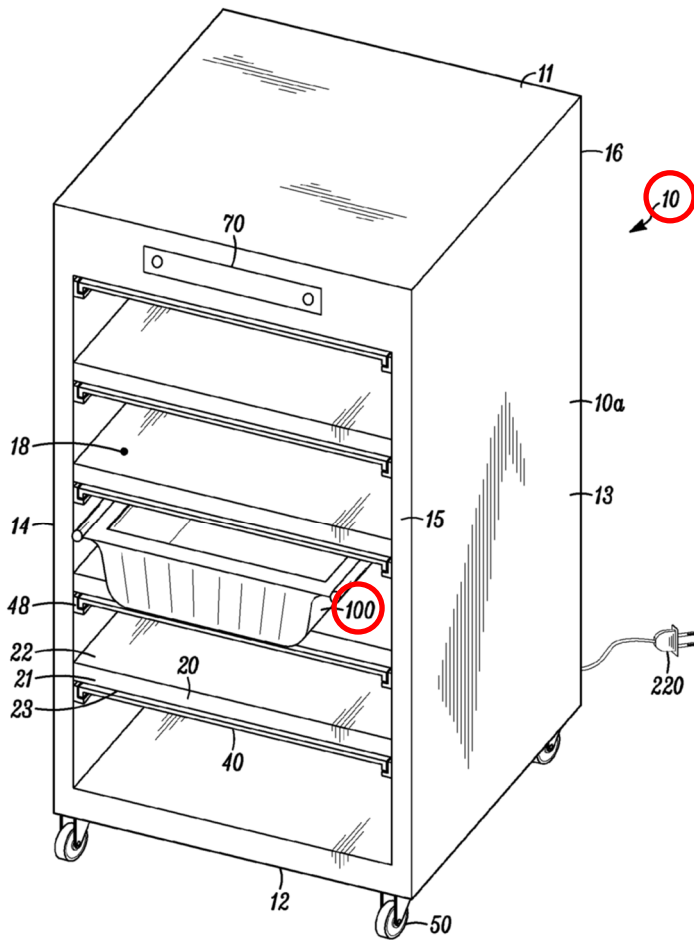


FIG. 1

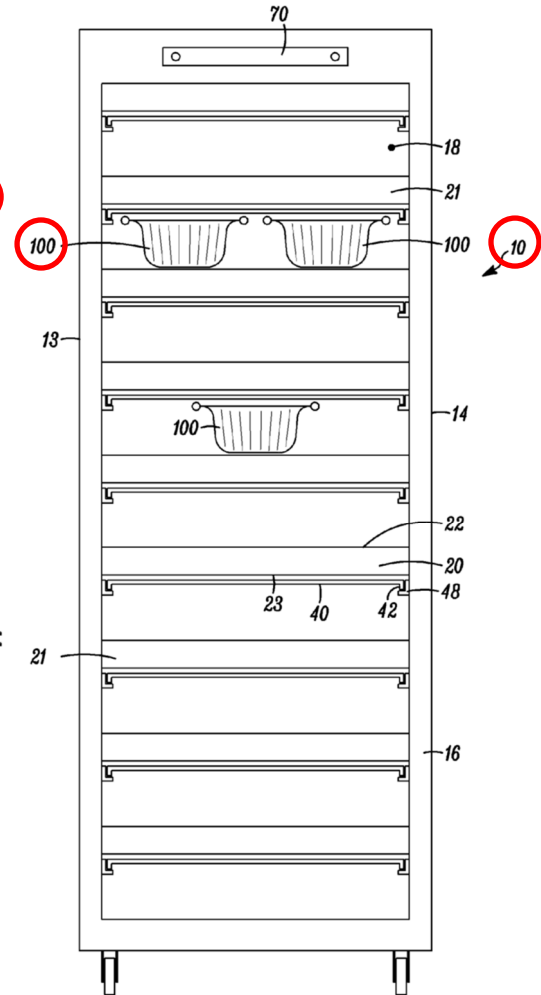


FIG. 6

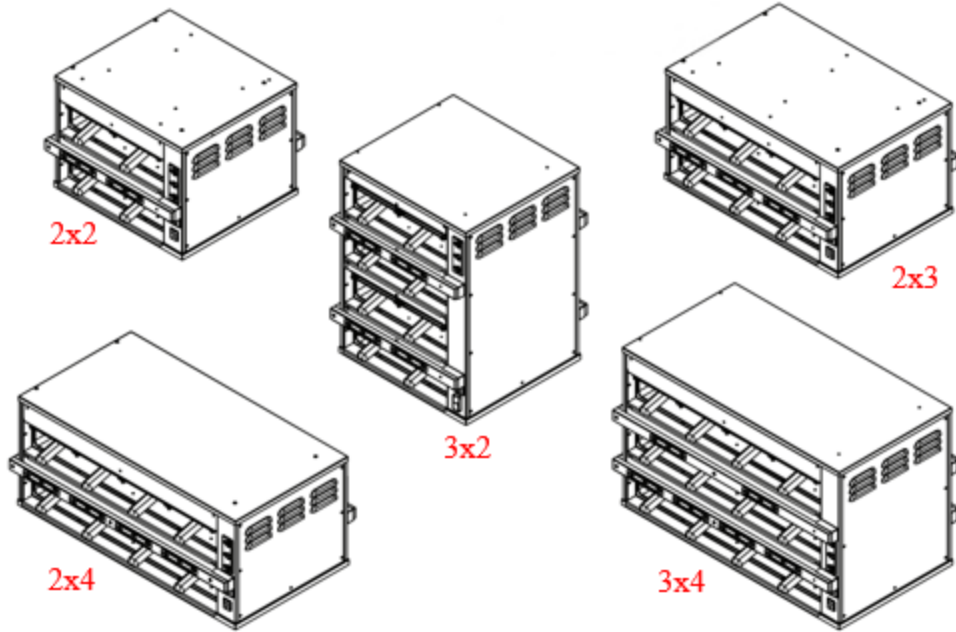
EX1010.

The cabinet can be “only about 1-2 feet tall ... to rest upon a table,” with compartments/shelves having “sufficient width to accept *two or more* ... warming pans.” EX1010: ¶¶[0014]-[0016]; EX1003: ¶¶524-526.

IRHS Documents teach 2x4 and 3x4 bay configurations. EX1005: 1; EX1006: 1; EX1007: 55-57; EX1003: ¶527.

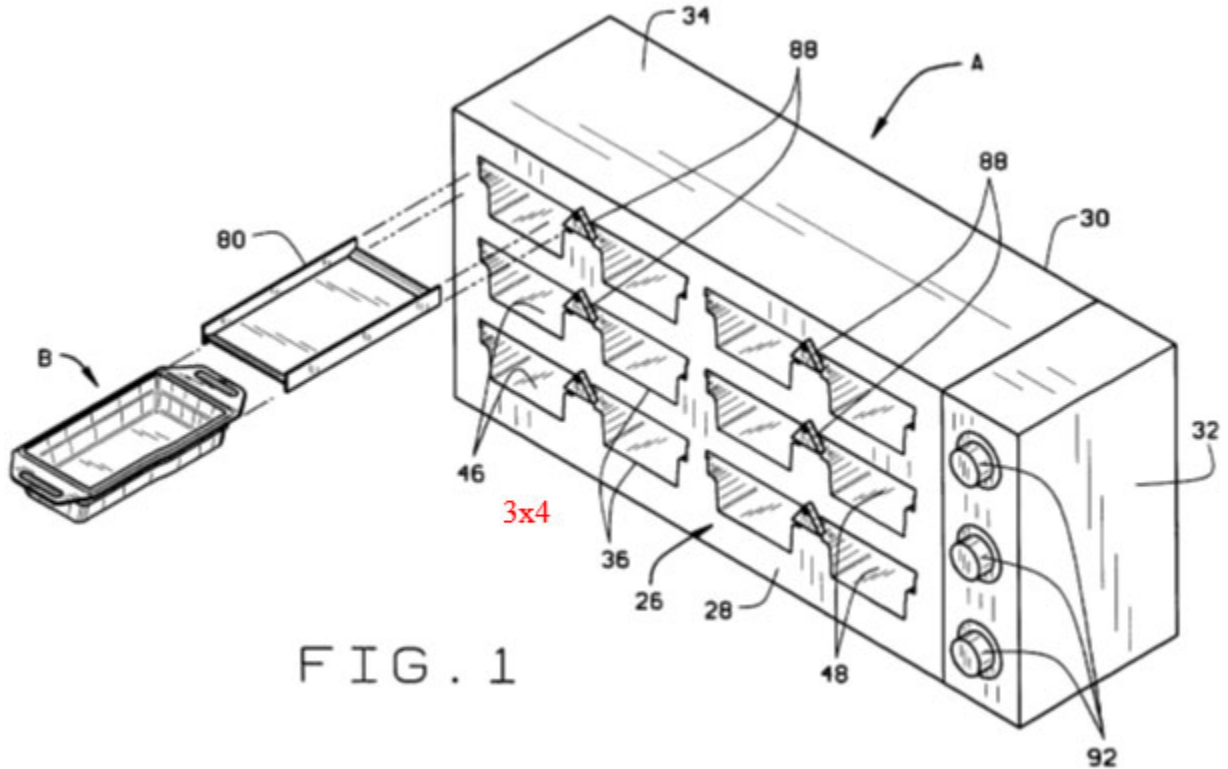
MODELS

IRHS22
IRHS23
IRHS24
IRHS34
IRHS42



EX1005: 1.

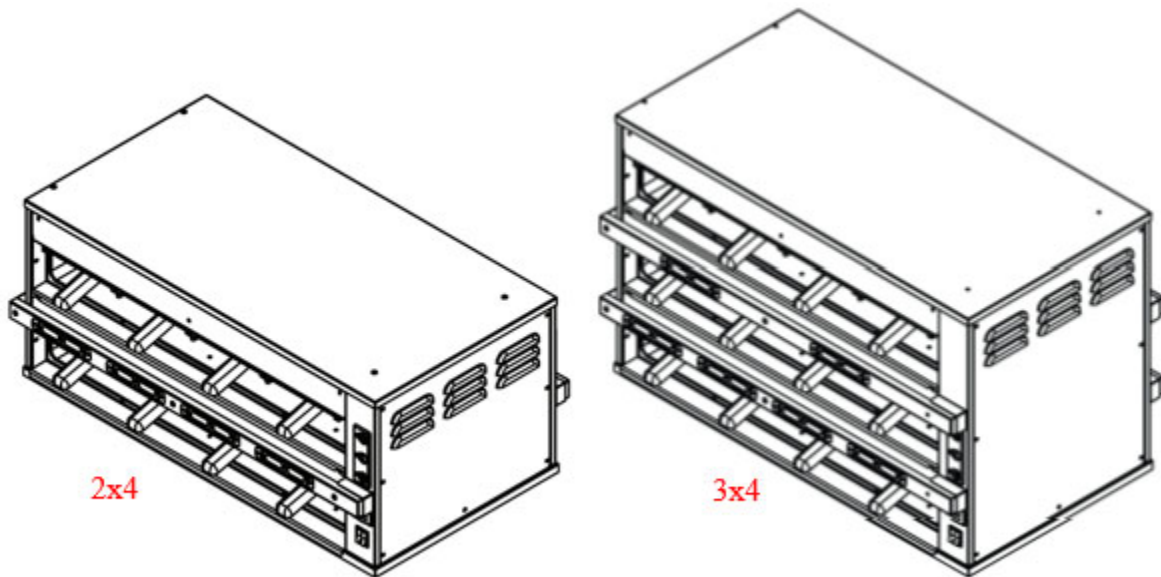
Shei'099 teaches a 3x4 configuration. EX1017: 3:9-16; EX1003: ¶528.



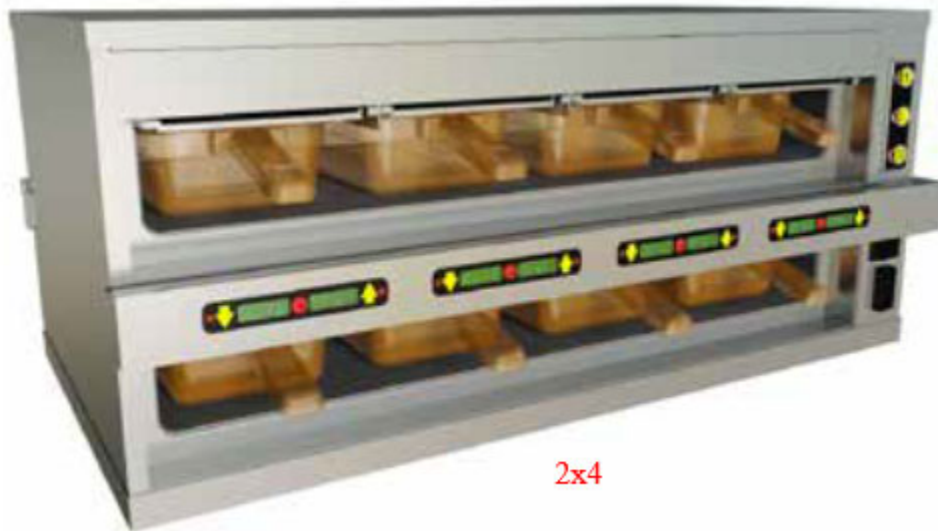
EX1017.

Per IRHS Documents and/or Shei'099, it would have been obvious to provide Fortmann'748 with two and/or three compartments—each having four narrower pan bays—resulting in a 2x4 or 3x4 configurations “only about 1-2 feet tall,” suitable to “rest upon a table.” EX1010: ¶[0014]; EX1007: 53; EX1003: ¶¶529-530. This would reduce manufacturing and shipping cost (less material, fewer parts, smaller package, less weight). EX1003: ¶531.

2x4 and 3x4 configurations—common in the art—would be an obvious design choice. *Uber Techs.*, 957 F.3d at 1341; EX1013: ¶¶[0028], [0030]; EX1014: Fig. 1; EX1015: ¶¶[0024], [0026]; EX1003: ¶532.



EX1005: 1.



2x4

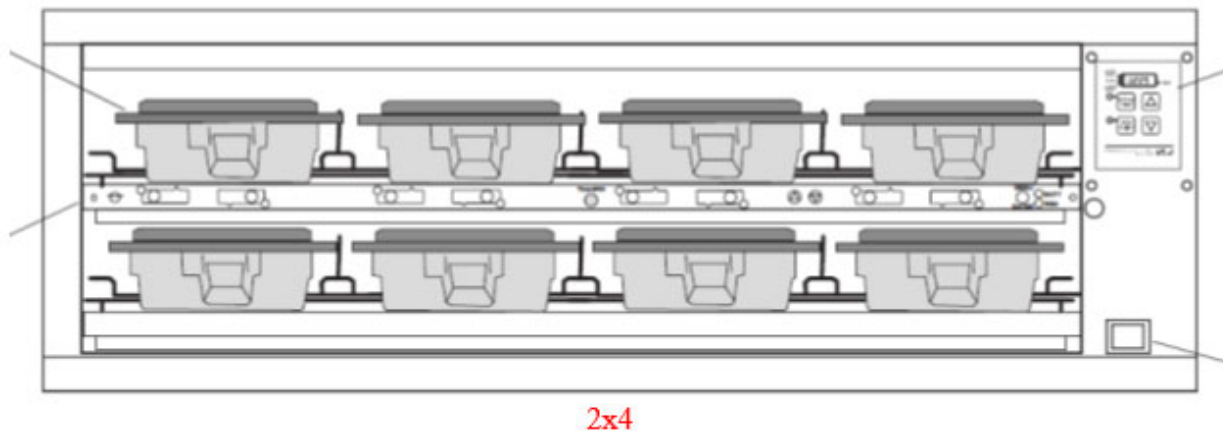


3x4

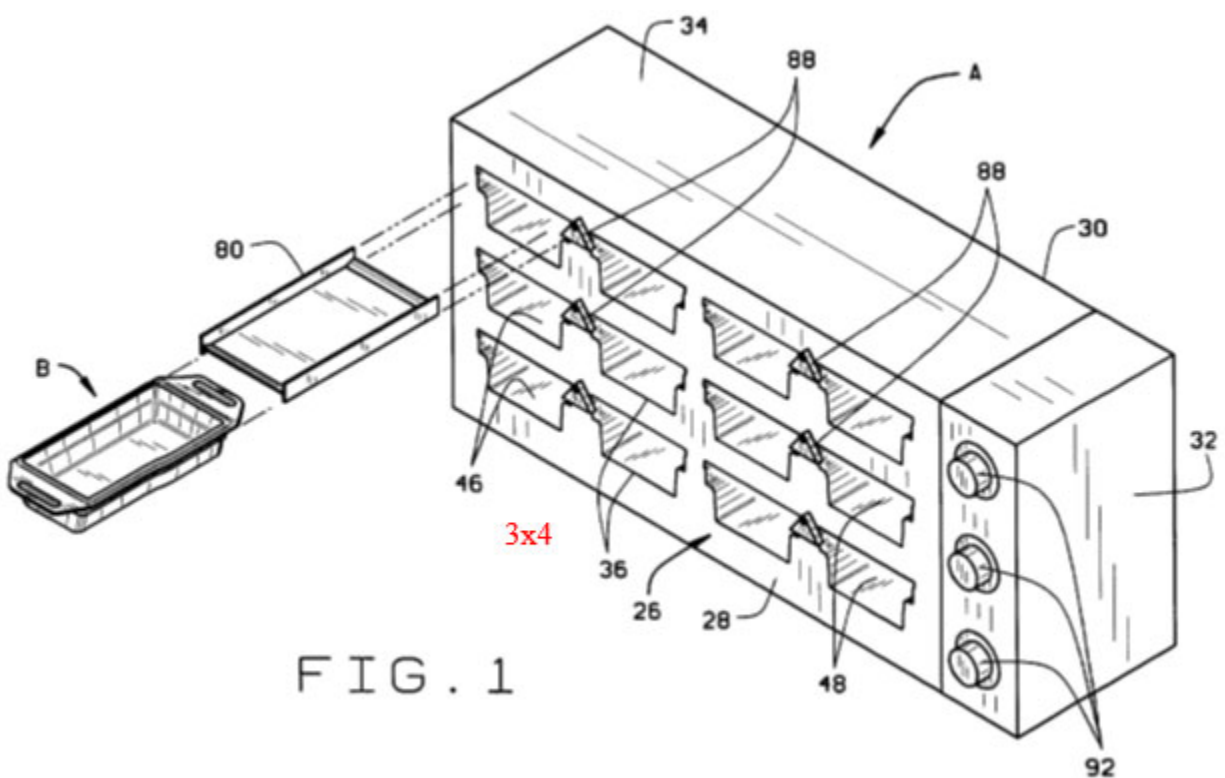
EX1007: 56.



8-PAN HORIZONTAL (4 WIDE
X 2 HIGH) – PASS-THRU
HOLDING BIN WITH
MENUTRAK



EX1009: 11, 19.

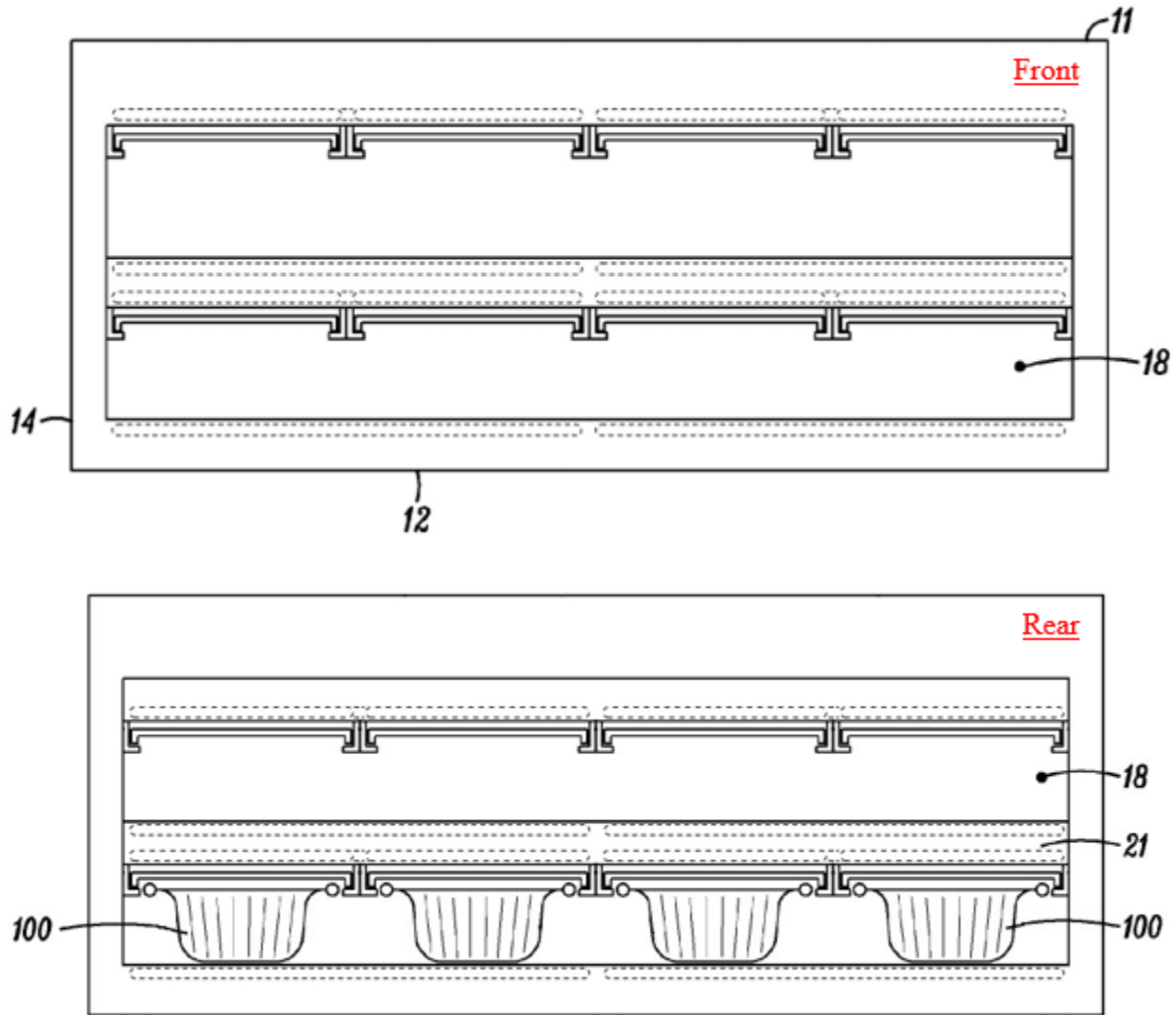


EX1017.

This applies a known technique (2x4/3x4 configurations) to improve a similar device (Fortmann'748) in the same way, with reasonable expectation of success (simply removing components and/or changing their size). EX1005: 1;

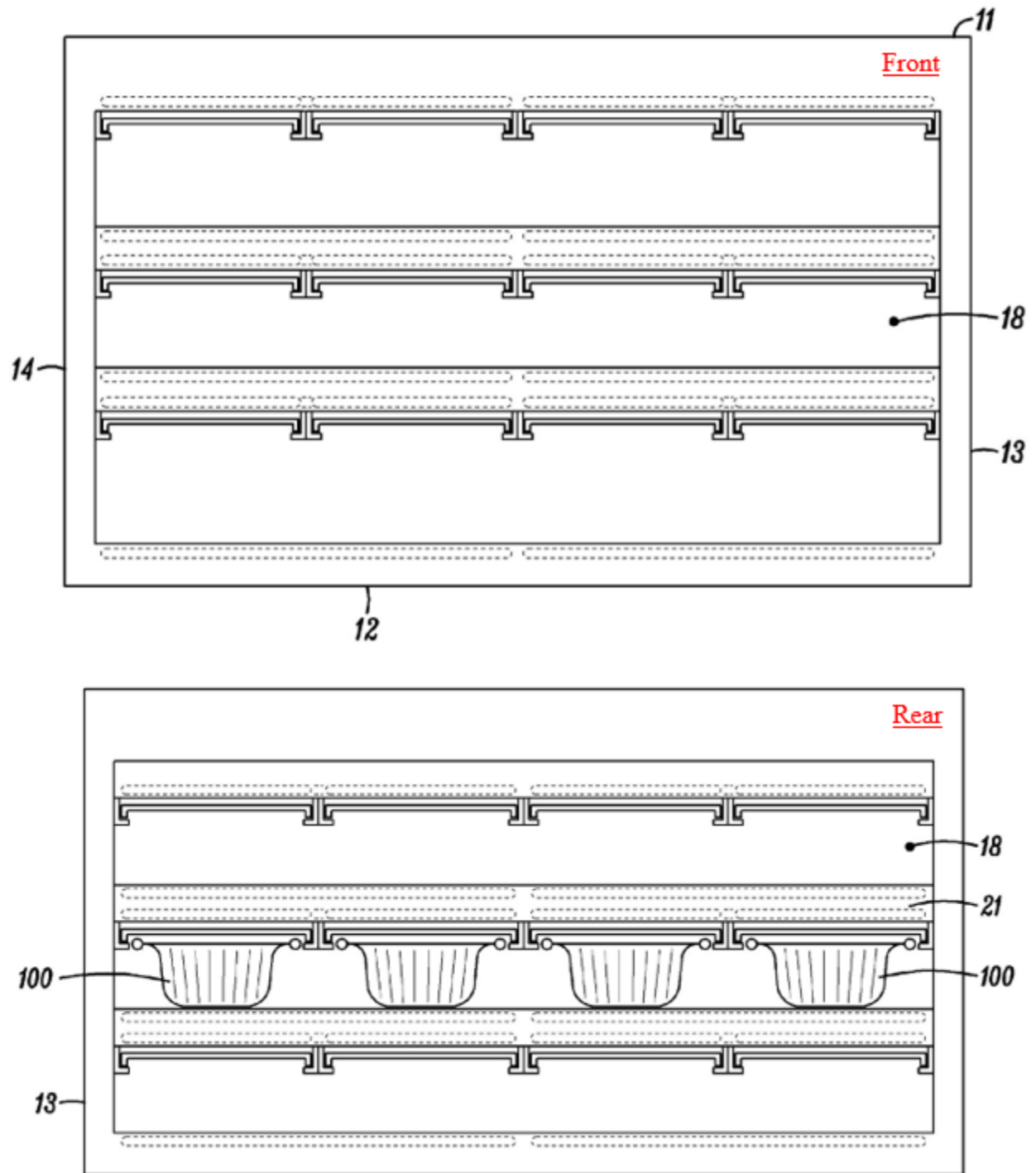
EX1006: 1; EX1007: 55-57; EX1010: ¶[0014]; EX1017: Fig. 1; EX1003: ¶¶533-534.

2x4 and 3x4 modifications are represented below.² EX1003: ¶¶535-536.



EX1010: Figs. 2, 6 (modified).

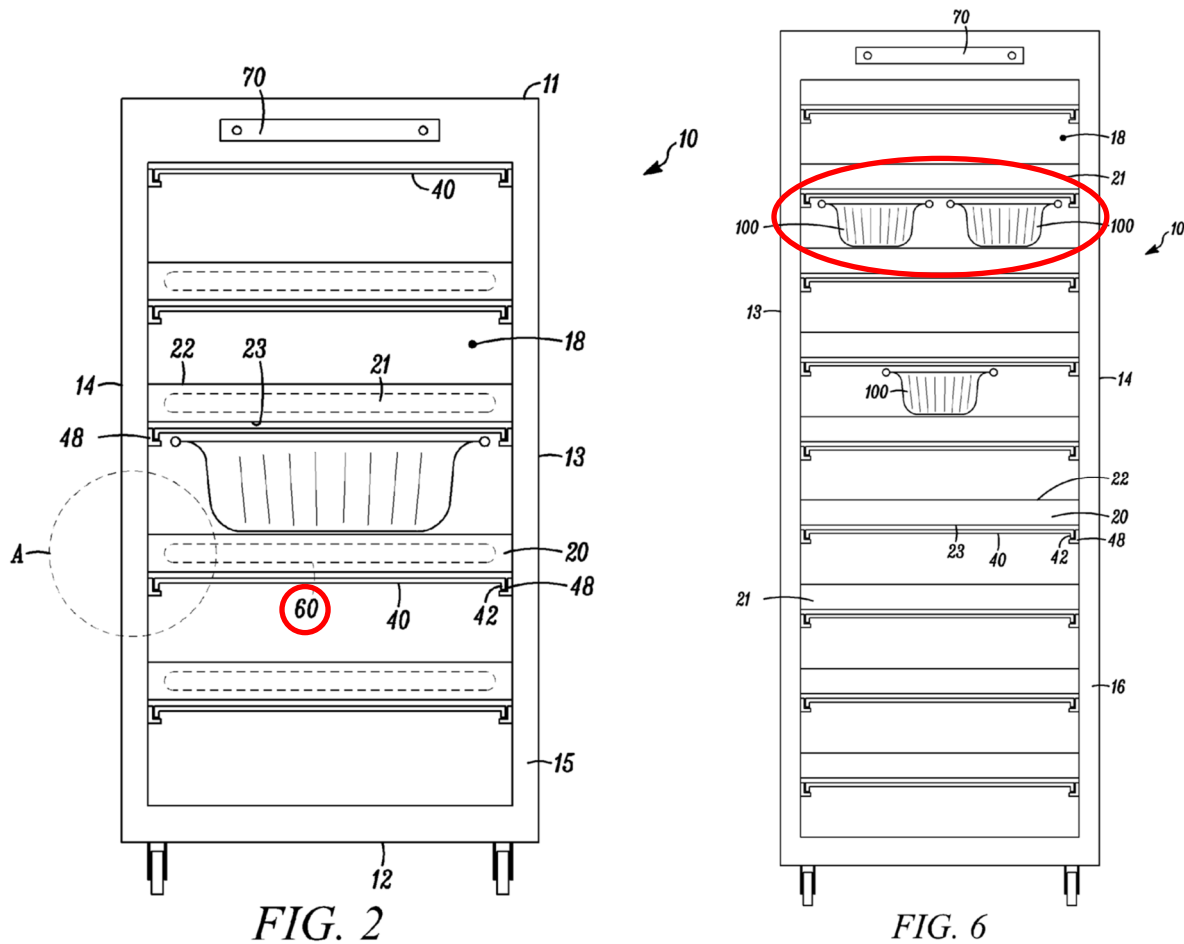
² Further modifications explained below.



EX1010: Figs. 2, 6 (modified).

2. Multiple Temperature Zones per Compartment

Fortmann'748 discloses "one or more heaters (60)," temperature zones, multiple pans per zone, and heating from above and below. EX1010: ¶¶[0019]-[0021], [0024], [0027]; EX1003: ¶¶537-539.



EX1010.

Jones teaches compartments having two bays (ULTL-LRTL) and quadrant zoning where each compartment has side-by-side zones open across the compartment with each zone having discrete upper and lower heaters. EX1012: ¶¶[0069], [0072]-[0073], [0096]; EX1003: ¶¶540-544.

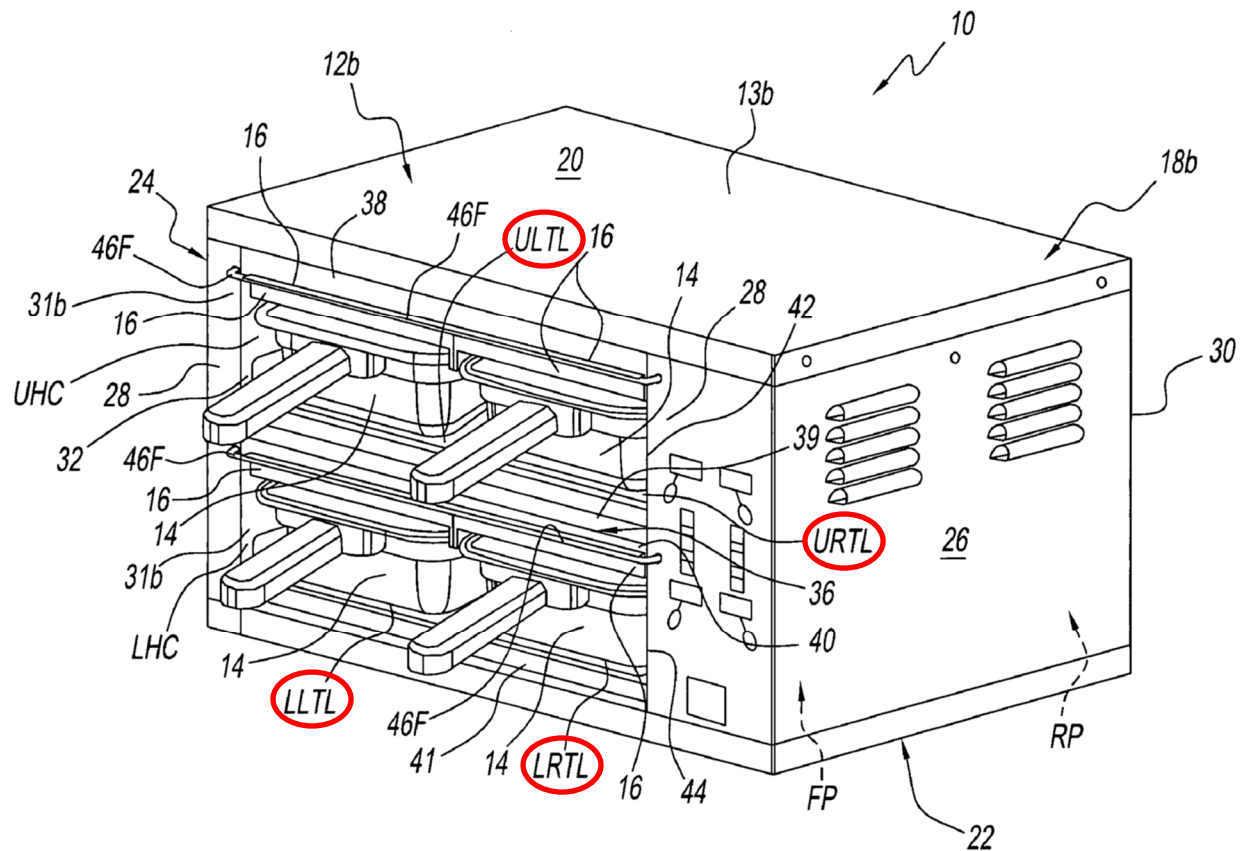


Fig. 1B

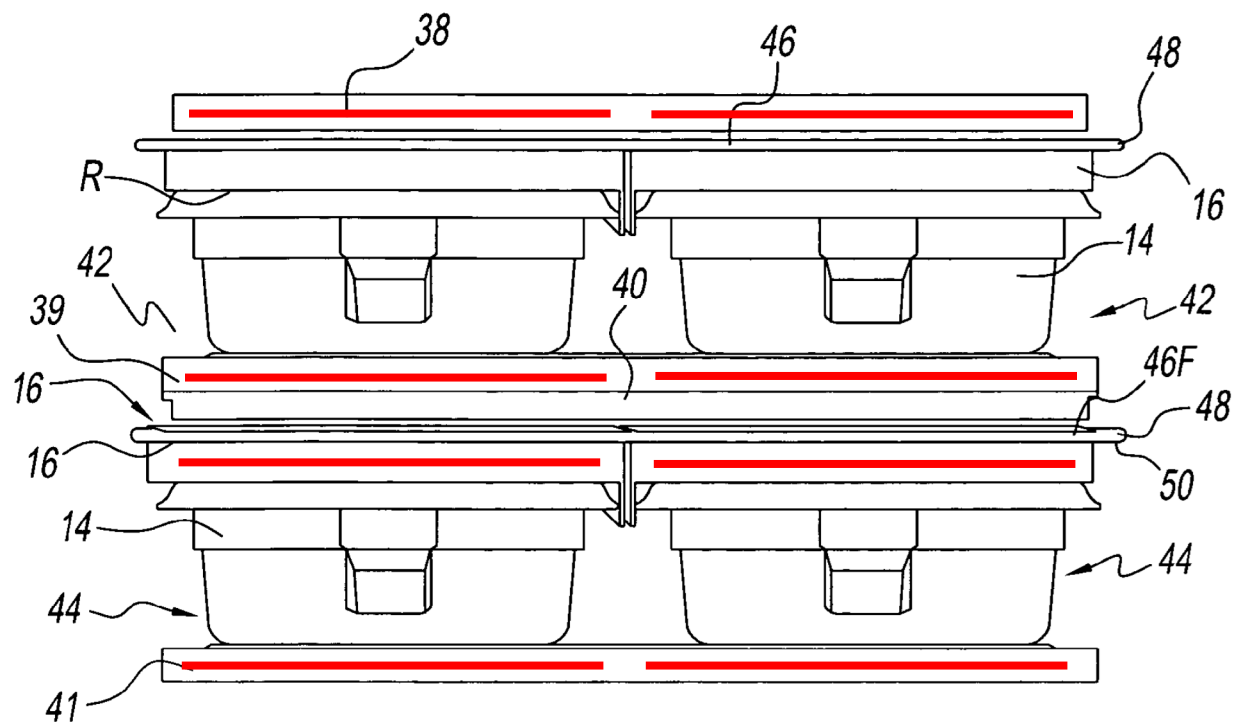


Fig. 1G

EX1012.

Hartfelder teaches quadrant zoning where each compartment (24, 26) has two top (70, 72) and two bottom heaters. EX1013: ¶¶[0037]-[0038]; EX1003: ¶¶545-546.

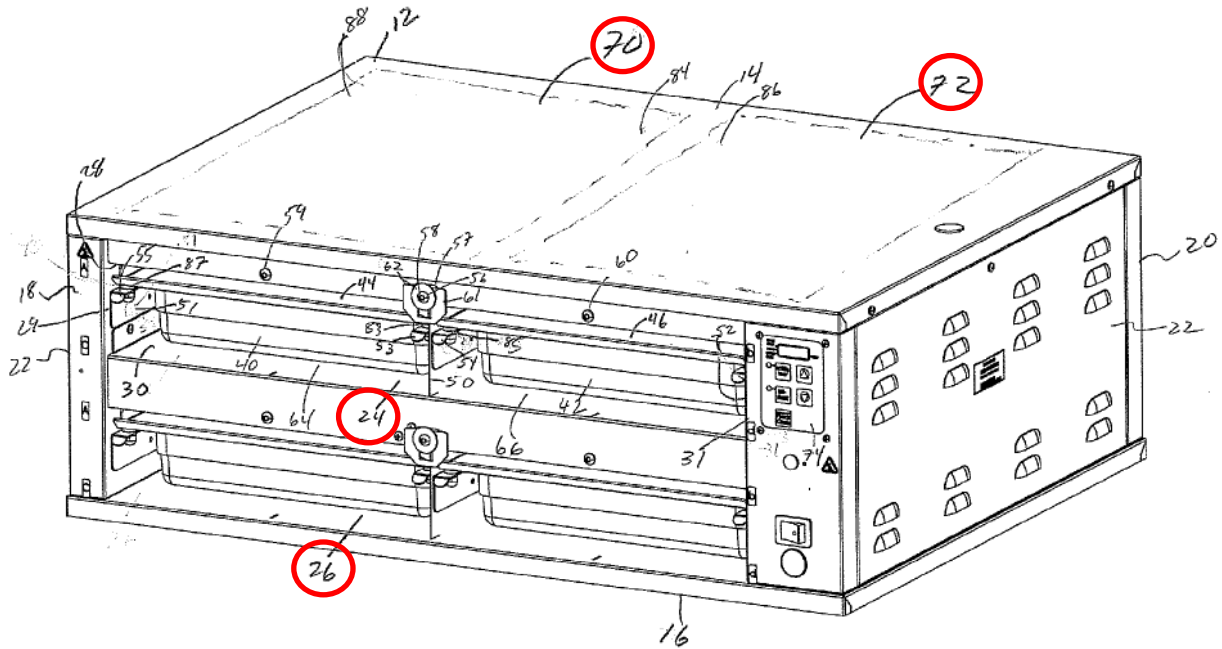


FIGURE 1

EX1013.

Hartfelder discloses quadrants/zones configurable (via partitions) to have two pan bays sharing the quadrant's/zone's upper and lower heaters (e.g., shown in lower-right zone/quadrant of Fig. 3), with bezel controls/displays for all eight bays.

EX1013: ¶¶[0031], [0037], [0034], [0039], [0041], Fig. 3; EX1003: ¶¶547-550.

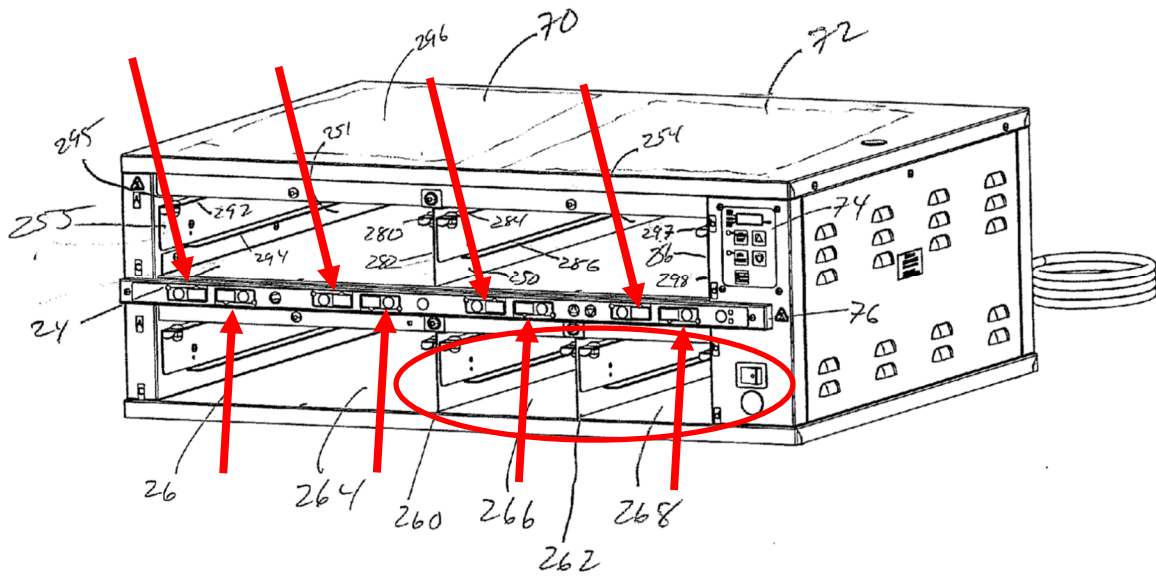


FIGURE 3

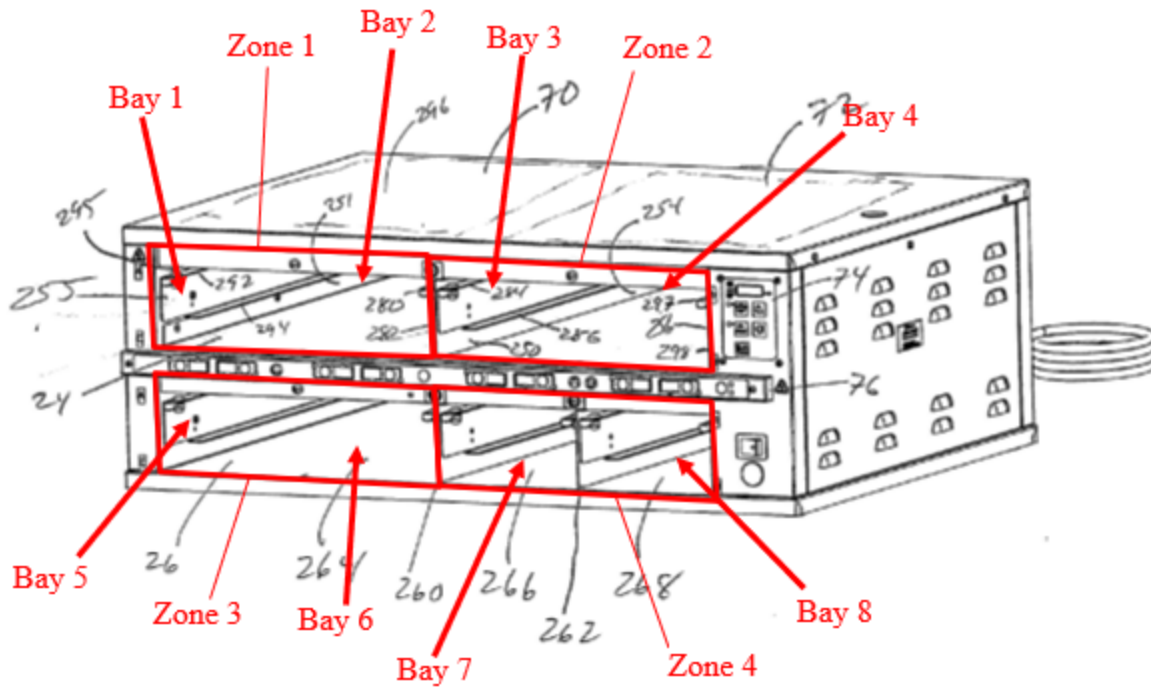


FIGURE 3

EX1013.

Stanger teaches quadrant zoning where each compartment includes two-pan/two-bay heating zones adjacent/open across the compartment. EX1042:

¶[0055]; EX1003: ¶¶551-552.

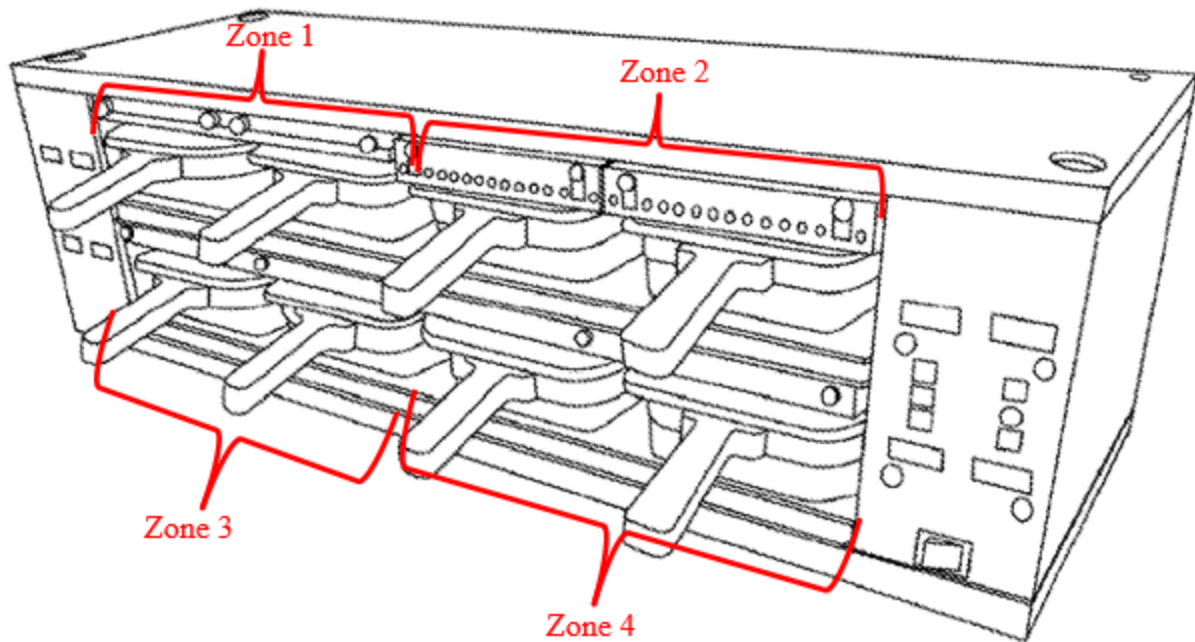
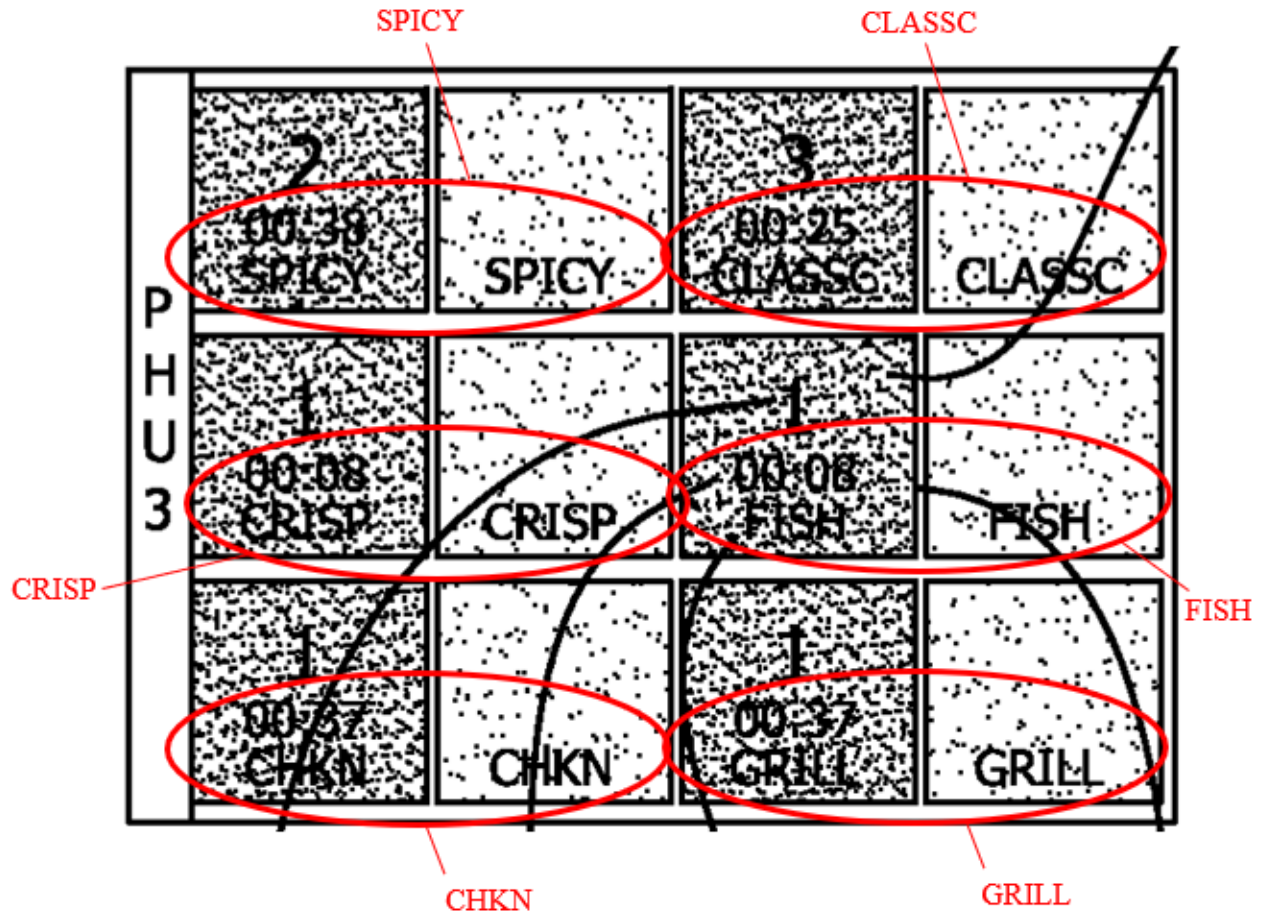


FIG. 14

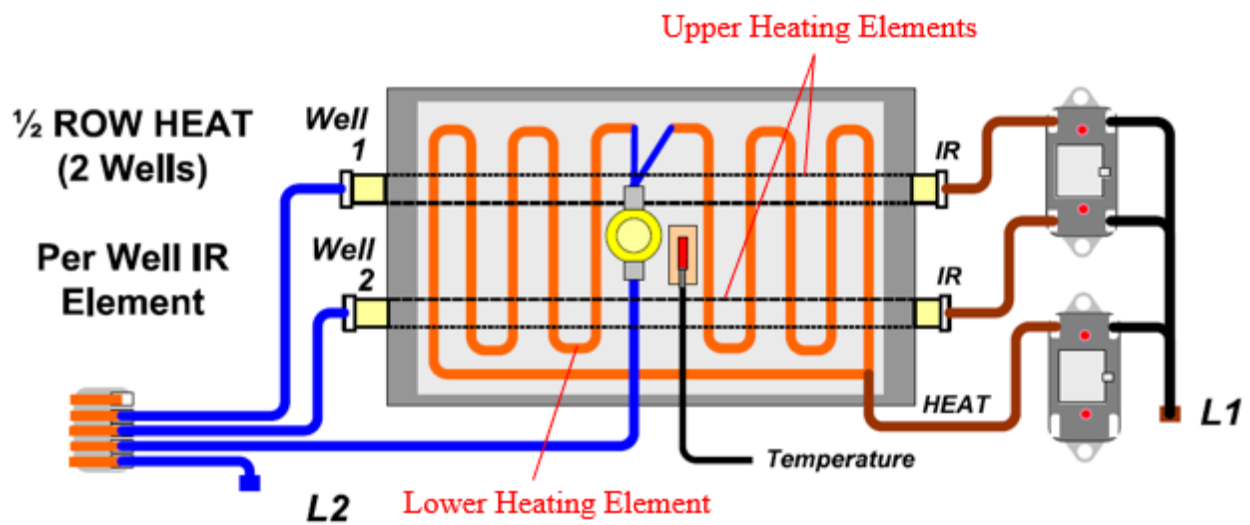
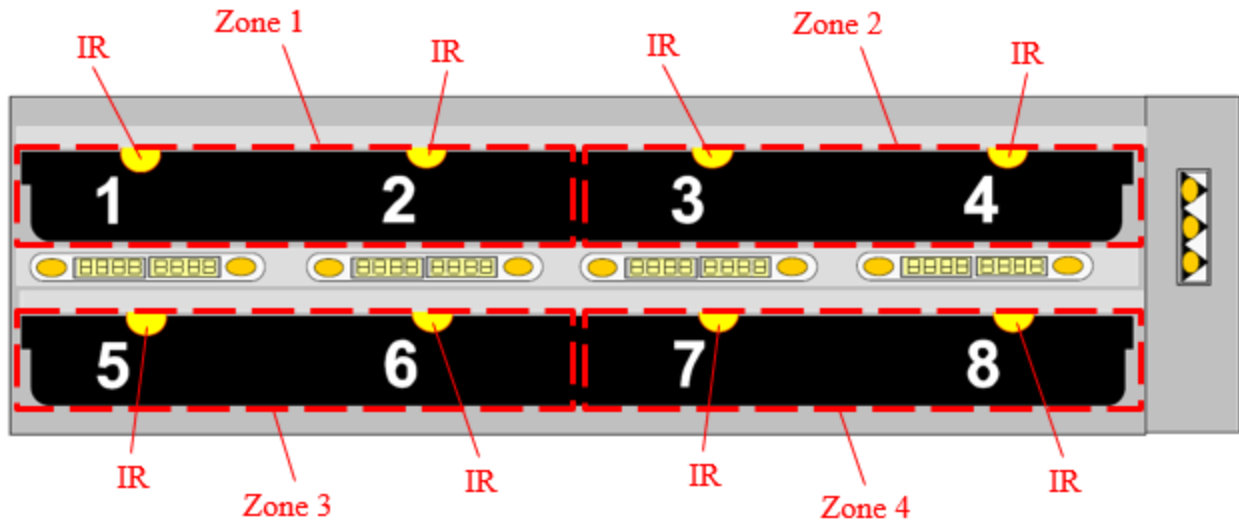
EX1042.

Loy teaches a pan arrangement where each food type is held in a pair of adjacent pans. EX1003: ¶¶553-554.

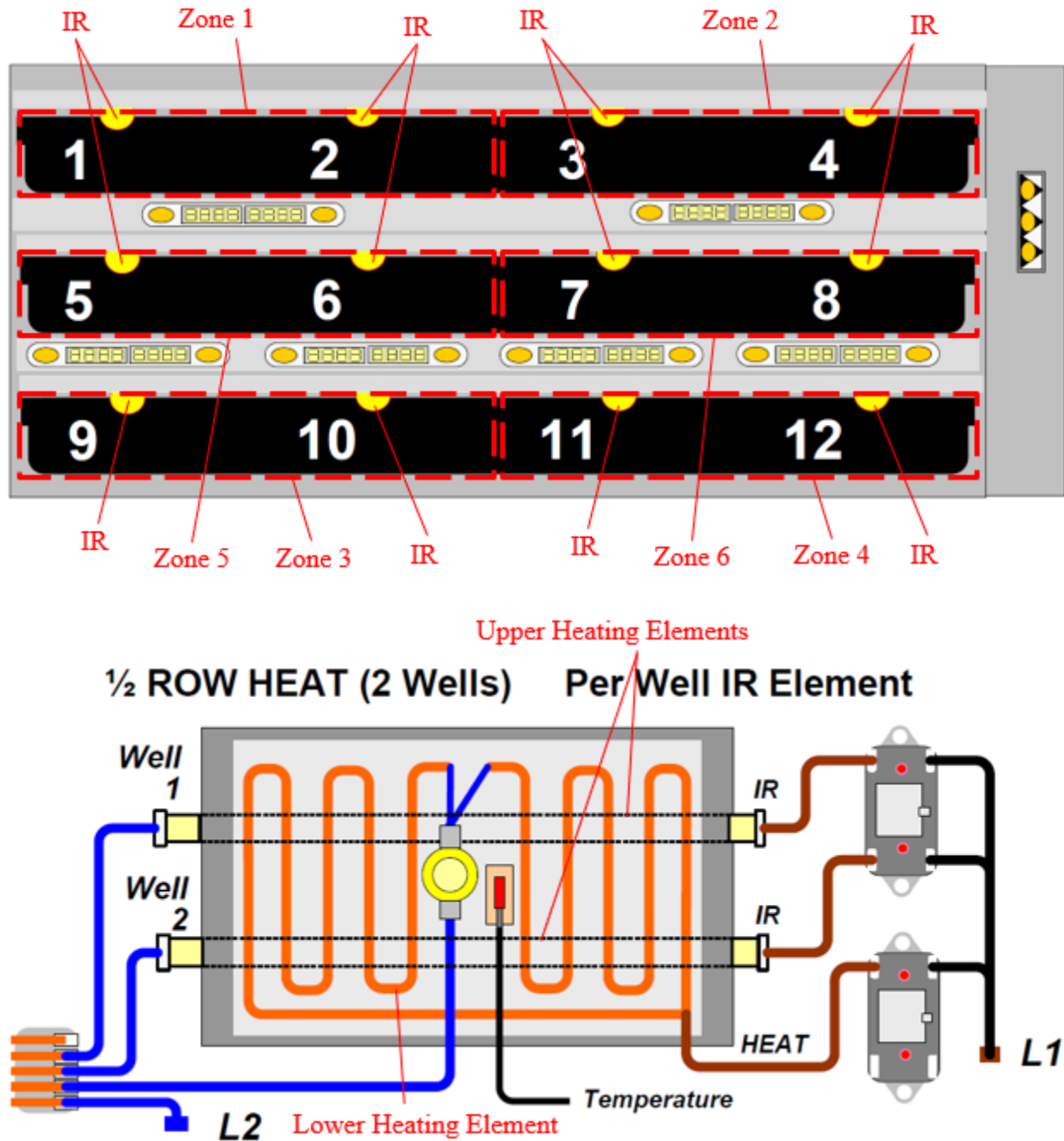


EX1043: Fig. 17 (enlarged).

Alternatively, IRHS Documents teach two-pan/two-bay zoning where each zone has two upper IR bulbs and a shared lower element (zones open across compartment). EX1005: 20, 25, 26; EX1007: 53; Section IV; EX1003: ¶¶571-576.



EX1005: 25.



EX1005: 26.

Per Jones, Hartfelder, Stanger, Loy, and/or IRHS Documents, it would have been obvious for each modified 2x4 and 3x4 Fortmann '748 to have multiple zones per compartment, two-pan/two-bay zoning, where each independently controlled

zone includes upper and lower heaters for two pans/bays, the zones adjacent/open across the compartment. EX1003: ¶555. This would be obvious per the prior art teachings for zoning across the compartment (Jones, Hartfelder, Stanger, IRHS Documents), zones including single upper and lower heaters (Jones, Hartfelder), zones sized for two pans (Hartfelder, Stanger, IRHS Documents), zones adjacent/open across the compartment (Jones, Stanger, IRHS Documents), and two-pan/two-bay zones facilitate two-pan cooked food inventory continuity (Loy). EX1003: ¶556.

Alternatively, per IRHS Documents, it would have been obvious to modify Fortmann’748 to provide multiple zones per compartment, two-pan/two-bay zoning, where each independently controlled zone includes two upper heaters and a single lower heater for the two pans/bays, the zones being adjacent/open across the compartment. EX1003: ¶577.

Both modifications further Fortmann’748’s goal for “zones” for “food products [requiring] different warming temperatures”. EX1010: ¶¶[0024], [0027]; EX1019: 1:36-45, 1:46-48, 4:45-52; EX1003: ¶¶557, 578.

This enables each compartment to receive food/pans requiring different temperatures, increasing flexibility and enabling holding more food types simultaneously. EX1007: 51, 53; EX1019: 1:38-40; EX1003: ¶558, 579. This also provides intermediate zoning granularity without requiring the complexity of

separate heaters for each pan/bay and facilitates holding two pans per food type for inventory continuity, increasing service speed/customer satisfaction. EX1043:

¶¶[0002]-[0003]; EX1007: 8; EX1046: 2; EX1003: ¶¶559-560.

Market forces, demonstrated by actual Burger King requirements, motivated two-pan/two-bay zoning with “[h]eat source[s] required above and below product pan.” EX1044: 50; EX1045: 2; EX1046: 2 (requiring “2 pan zones for product rotation”); EX1003: ¶¶561-562.

- PHU Heating Zones

Both new PHU units have different heating zones. Following the current standards that each product must have two PHU slots available, each heating zone consists of 2 PHU pan spaces. Each of the red spaces highlighted below represents a heating zone, therefore a 4x2 or a 2x4 PHU will have space for 8 PHU pans and 4 heat zones. A 3x4 unit will have space for 12 PHU pans and 6 heat zones.



EX1044: 50 (zoning bracket annotations original).

Product Holding Units (PHUs)

1. Heat source required above and below product pan
2. Dynamic controls to facilitate product-specific flexible recipes
 - a. Each recipe controls a two pan location
3. Extend hold time of Burger Core Products – validated by Sensory testing
4. Must supply all PHU Sizes – 3x4, 2x4, 2x3, & 2x2 **4x2 PHU may be required outside of US
5. Cannot exceed the following dimension per size
 - a. 2x2 - H 14.5" x W 20" x D 17.5"
 - b. 2x3 - H 14.5" x W 30" x D 17.5"
 - c. 2x4 - H 14.5" x W 36.5" x D 17.5"
 - d. 3x4 - H 21" x W 36.5" x D 17.5"
 - e. 4x2 - H 25.5" x W 20" x D 17.5"

EX1045: 2.

- i. Flat platen must have two zones for each two pans on 2x4 and 3x4. Example: A 2x4 will have two separate heat zones on top and two on bottom. Even if we can produce good results with one setting for current products, they want the flexibility for future development. This is a requirement for both Duke and Merco and is non-negotiable. The 2x3 could have 4 zones but they would like to see the price differential between 2 zones and 4. A decision will be made based on cost for the 2x3.

EX1049: 2.

This merely requires duplicating and resizing Fortmann'748's heaters around the compartments so each zone includes discrete upper and lower heaters. *In re Harza*, 274 F.2d 669, 671 (C.C.P.A. 1960) ("mere duplication of parts has no patentable significance"); EX1003: ¶566.

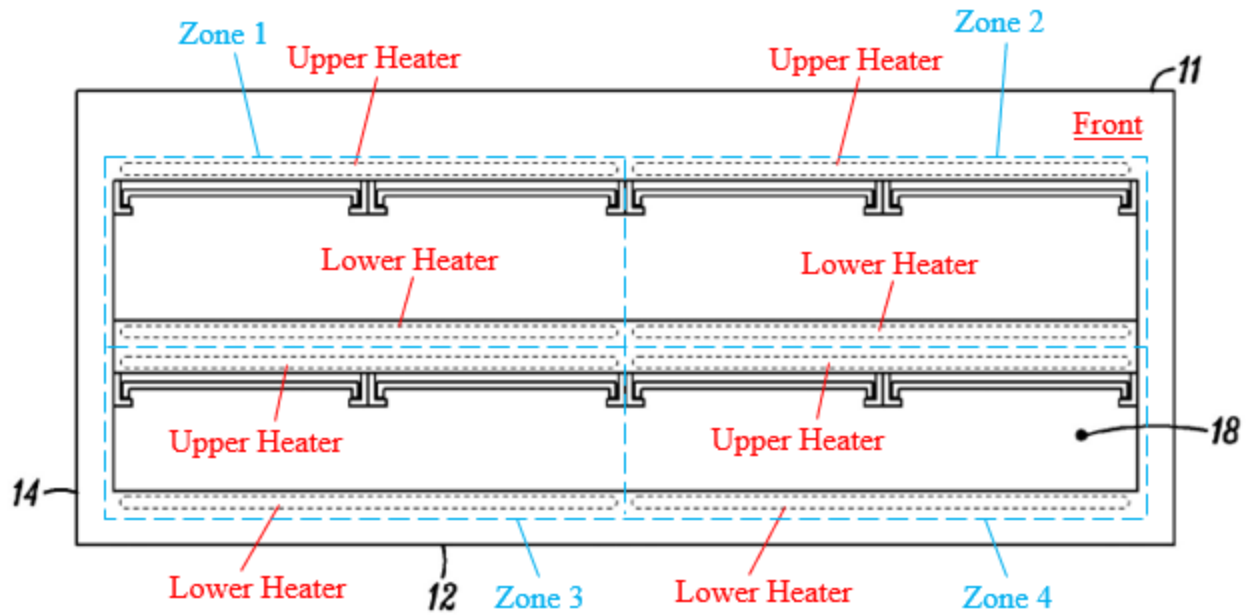
For Fortmann'748's zones, POSA would maintain upper and lower heaters for more uniform heating, better food quality, and extended hold time (EX1010: ¶[0020]; EX1006: 1; EX1005: 4; EX1007: 53), would connect the heaters to

Fortmann's zone-capable controller (EX1010: ¶[0027]), and would maintain the bays open across compartments for easier cleaning (EX1005: 13-14; EX1017: 7:32-35). EX1003: ¶¶563-564.

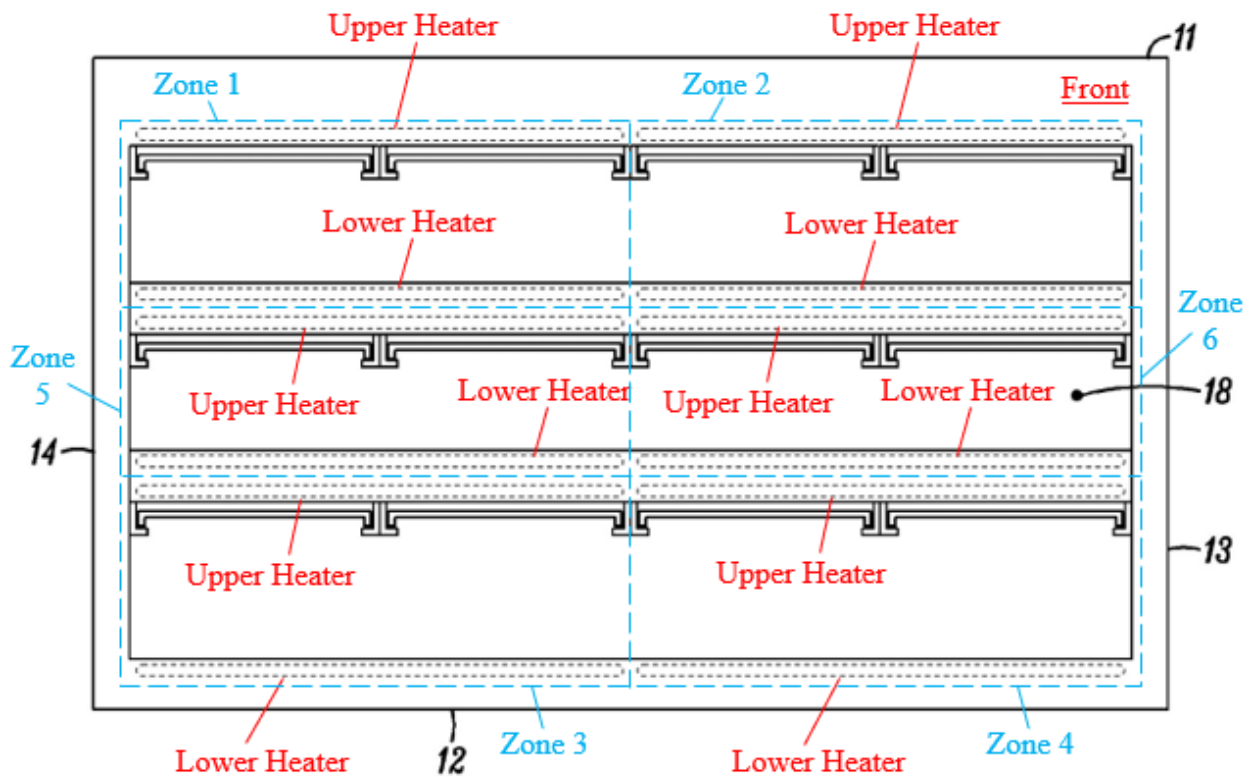
This applies a known technique (upper and lower element arrangements for zoned compartments) to improve a similar device (Fortmann'748) in the same way (two-pan/two-bay heating zones across compartments) with reasonable expectation of success (Fortmann'748 already heating from above and below and having zone-capable control system, and prior art demonstrating adjacent/open zones across compartments). EX1010: ¶[0027]; EX1012: ¶¶[0073], [0096]; EX1019: 4:36-52, Fig. 5a; EX1020: ¶¶[0021]-[0023], Fig. 2; EX1005: 20, 25; EX1007: 53; Section IV; EX1003: ¶¶567-569, 581-583.

If Fortmann'748's top compartment lacks upper heaters and bottom compartment lacks lower heaters, this modification would add such heaters for more uniform heating, better food quality, and extended hold time. EX1006: 1; EX1005: 4; EX1007: 53; EX1003: ¶¶565, 580.

Per Jones/Hartfelder/Stanger/Loy, POSA would duplicate Fortmann'748's heaters so each two-pan/two-bay zone has single upper and lower heaters. EX1003: ¶570.

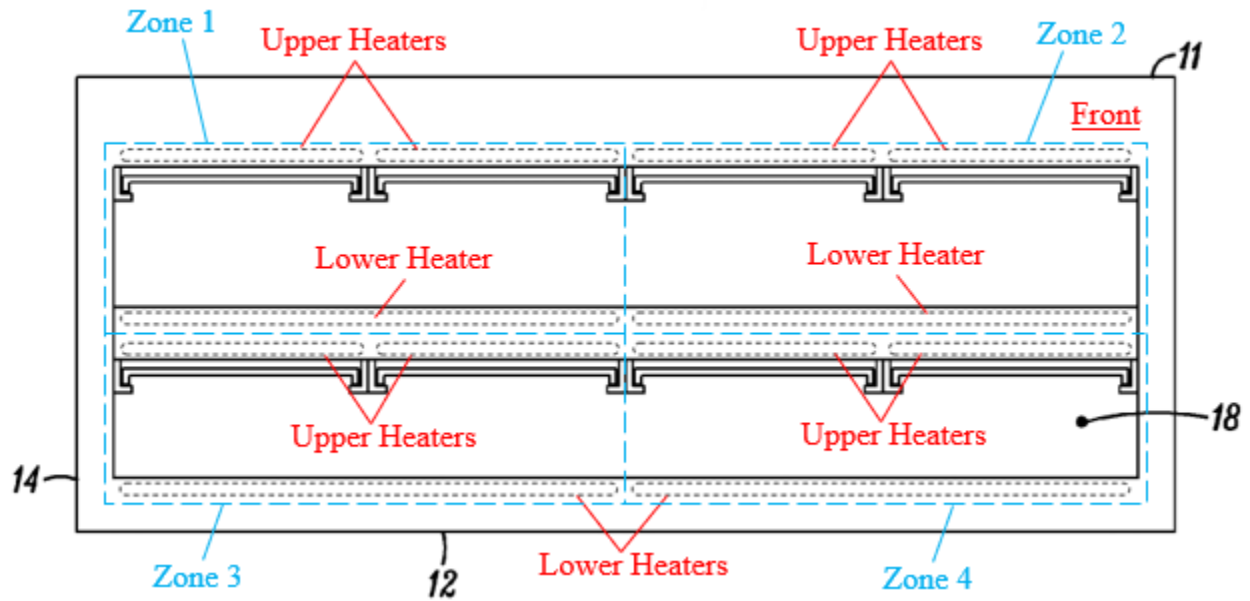


EX1010: Fig. 2 (modified).

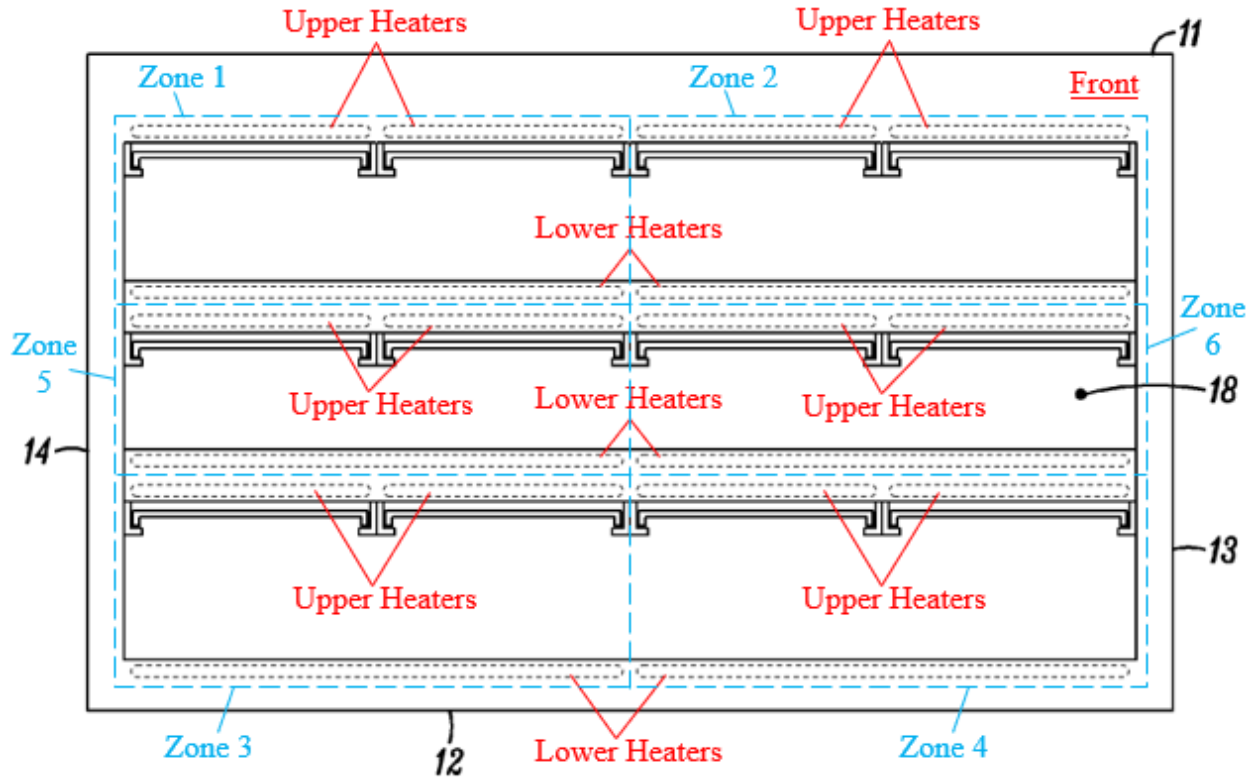


EX1010: Fig. 2 (modified).

Per IRHS Documents, POSA would duplicate Fortmann'748's heaters so each two-pan/two-bay zone has two upper heaters and one lower heater. EX1005: 20, 25; EX1006: 1; EX1007: 53; EX1003: ¶584.

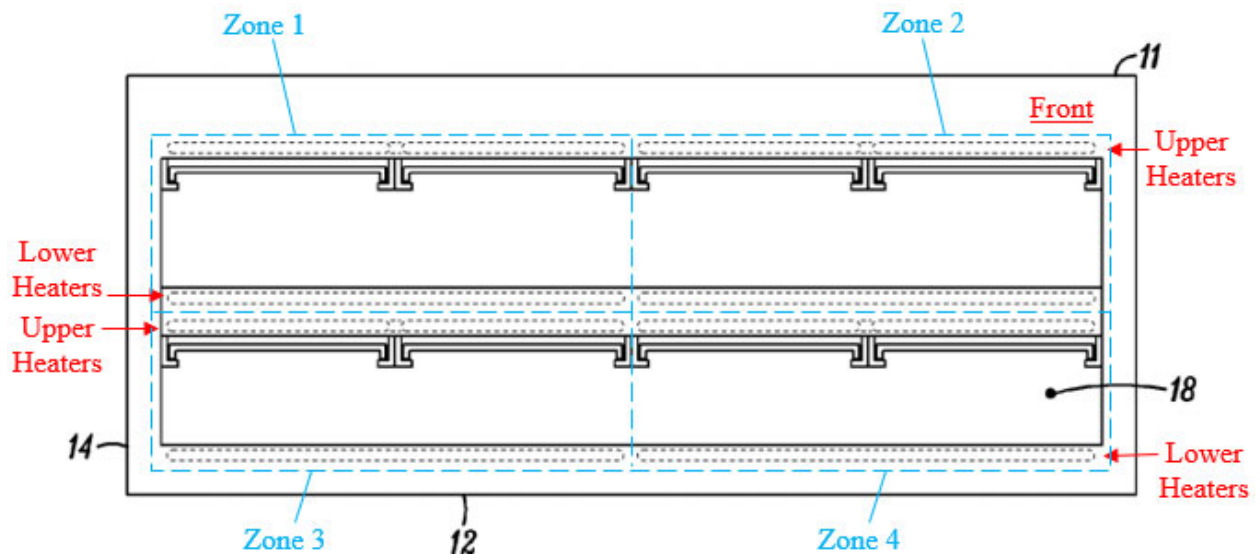


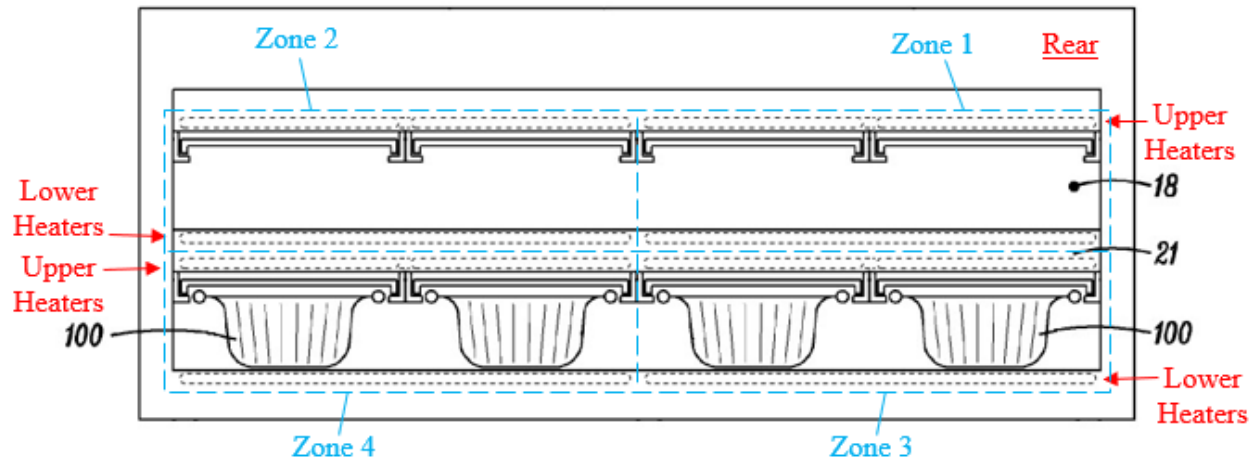
EX1010: Fig. 2 (modified).



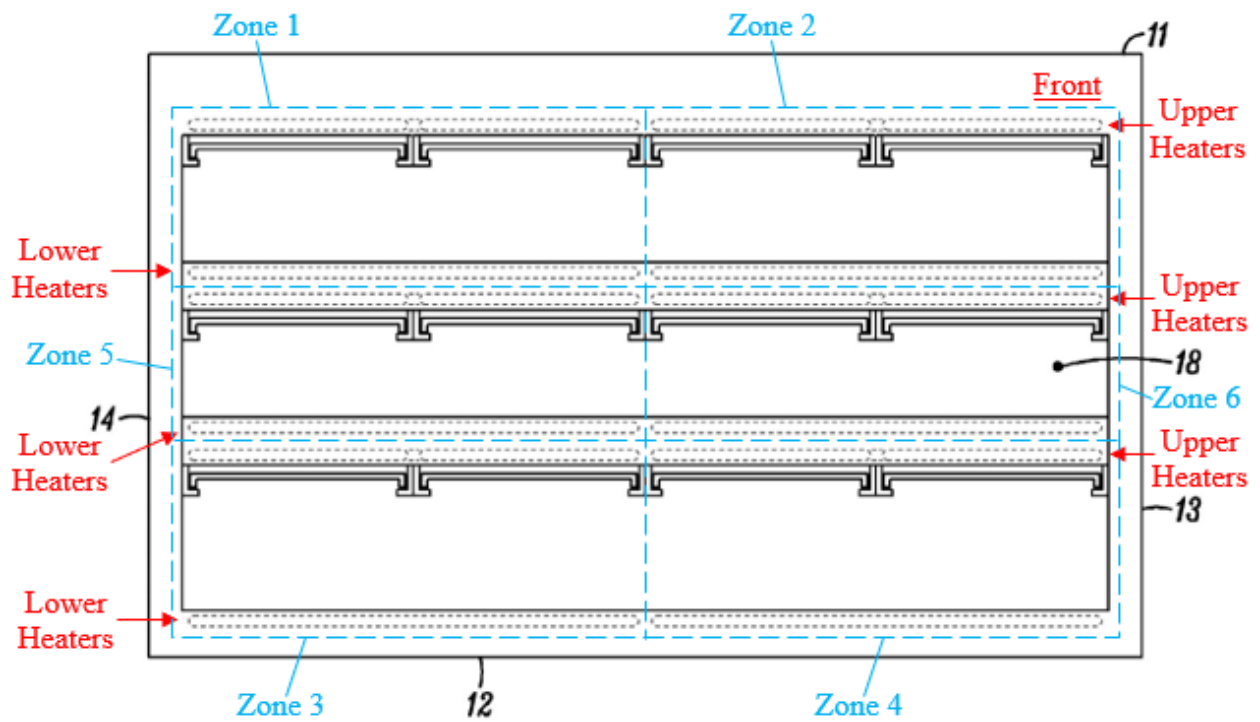
EX1010: Fig. 2 (modified).

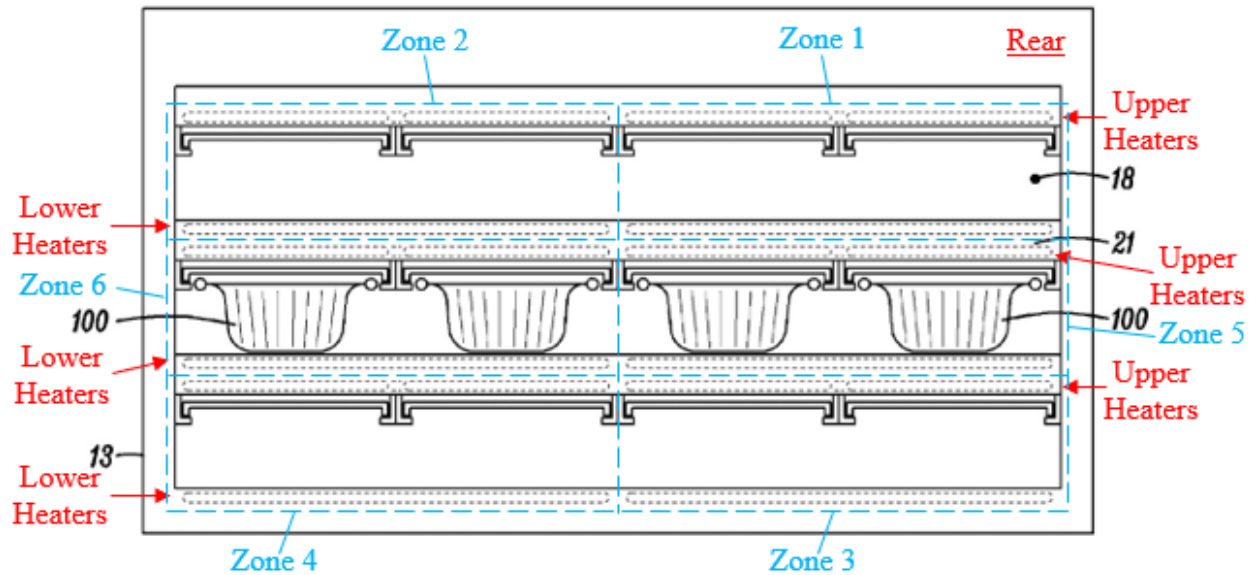
Schematic illustrations below (used hereafter and including the further modifications explained below) show both heater configurations (2x4 and 3x4) and invalidity results either way. EX1003: ¶585.





EX1010: Figs. 2, 6 (modified).





EX1010: Figs. 2, 6 (modified).

Insulation can be added to facilitate zoned heating. EX1018: 4:33-38;

EX1014: 9:32-37; EX1003: ¶586.

3. Independently Controllable Top and Bottom Heaters per Zone

Fortmann'748's heaters (60) are independently controllable. EX1010:

¶¶[0021], [0027]; EX1003: ¶587.

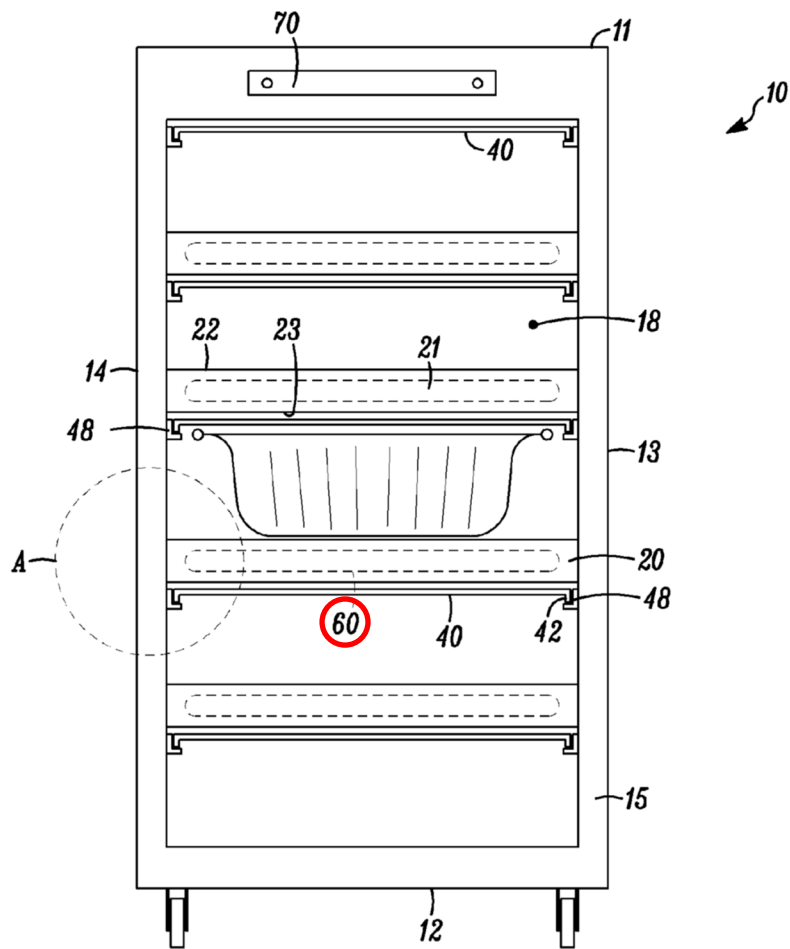


FIG. 2

EX1010.

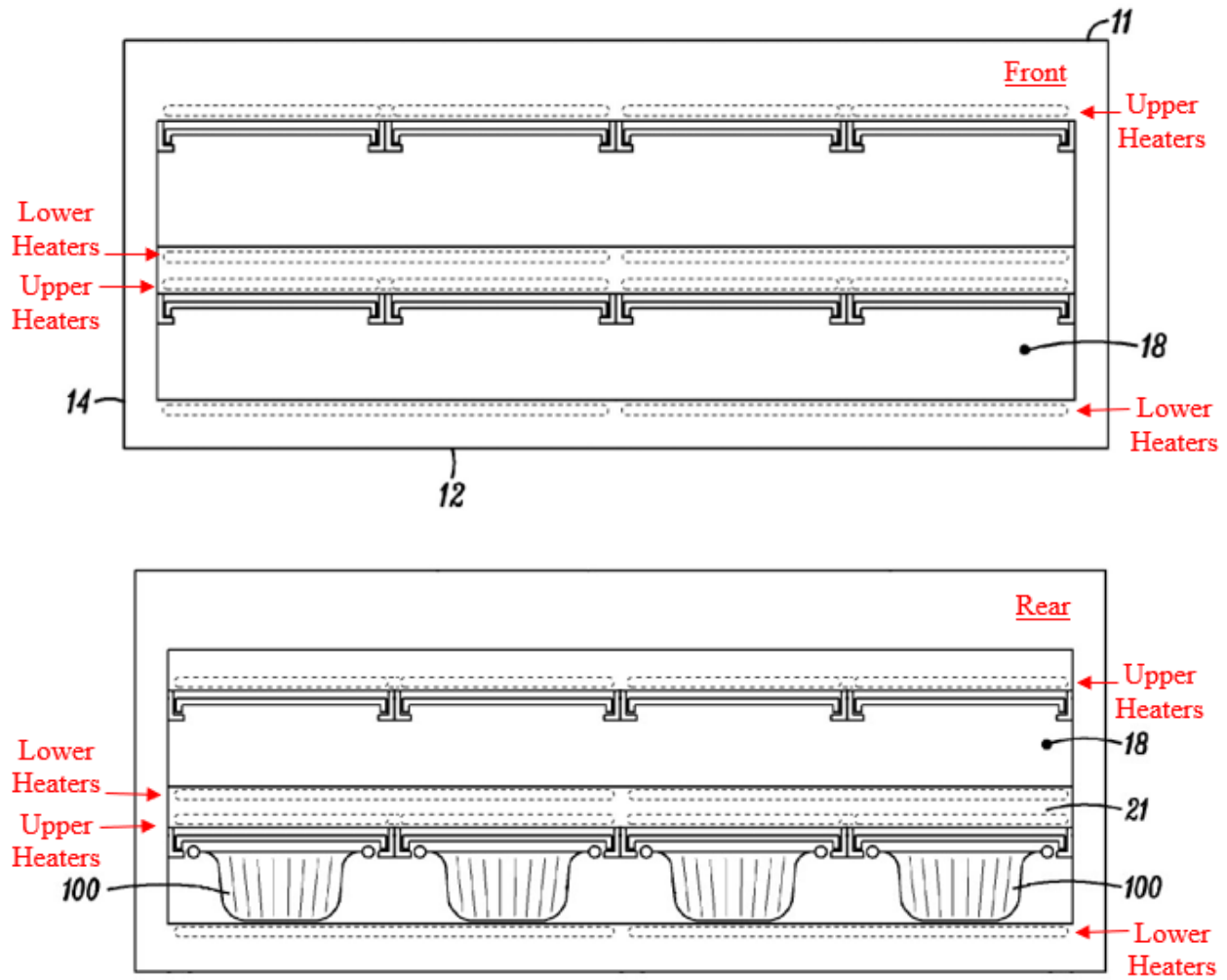
Jones, Fortmann'197, IRHS Documents, and McMillan teach upper and lower heaters independently controllable for each zone. EX1012: ¶¶[0098], [0130]; EX1014: 8:63-67, 9:50-52, 9:59-65; Section IV(B)(1.b/1.c/1.d/1.e); EX1019: 4:40-42; EX1003: ¶¶588-592.

Per Jones, Fortmann'197, IRHS Documents, and/or McMillan, it would have been obvious to make each zone's upper and lower heaters independently

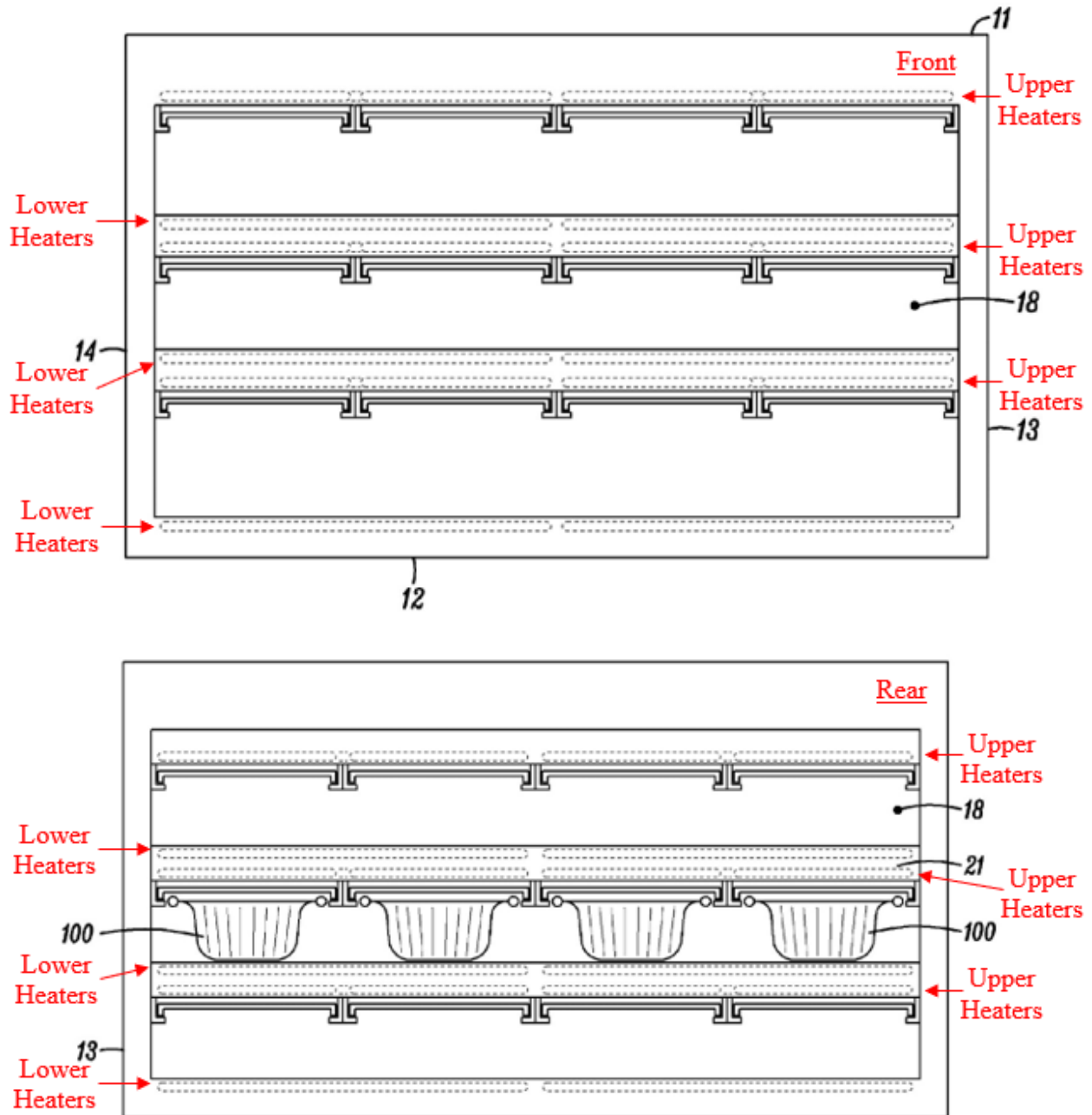
controllable to provide “more accurate temperature control between products” and “limit temperature bleed over between [zones]” (EX1012: ¶[0096]), enable “precise[] control [of each pan] environment, allowing customized settings” (EX1005: 4), “extend[] hold times while delivering hotter food” (EX1005: 4), and “minimize temperature distribution from top to bottom of [the] pan.” EX1006: 1; EX1007: 53; EX1003: ¶¶593-594.

This “offer[s] maximum flexibility in setting the precise food holding temperatures” via custom upper/lower temperature settings for food (e.g., eggs) requiring such settings. EX1009: 16; EX1028: 39; EX1003: ¶595.

This applies a known technique (independently controllable upper and lower heaters) to improve a similar device (Fortmann’748) in the same way with reasonable expectation of success (Fortmann’748 including zone-capable control system; prior art demonstrating independent heater control). EX1010: ¶[0027]; EX1005: 16; EX1006: 1; EX1007: 53; EX1012: ¶[0096]; EX1014: 8:63-67, 9:50-65; EX1019: 4:36-59; EX1003: ¶¶596-598.



EX1010: Figs. 2, 6 (modified).



EX1010: Figs. 2, 6 (modified).

In implementing two-pan/two-bay zoning and independently controlled upper and lower heaters (Section XIII(A)(2)-(3)), POSA would operatively couple the heaters to Fortmann'748's controller. EX1010: ¶[0027]; EX1014: 9:65-10:2;

EX1003: ¶¶599-600. Fortmann’748’s controller already operates different zones’ heaters independently and would operate the additional heaters independently.

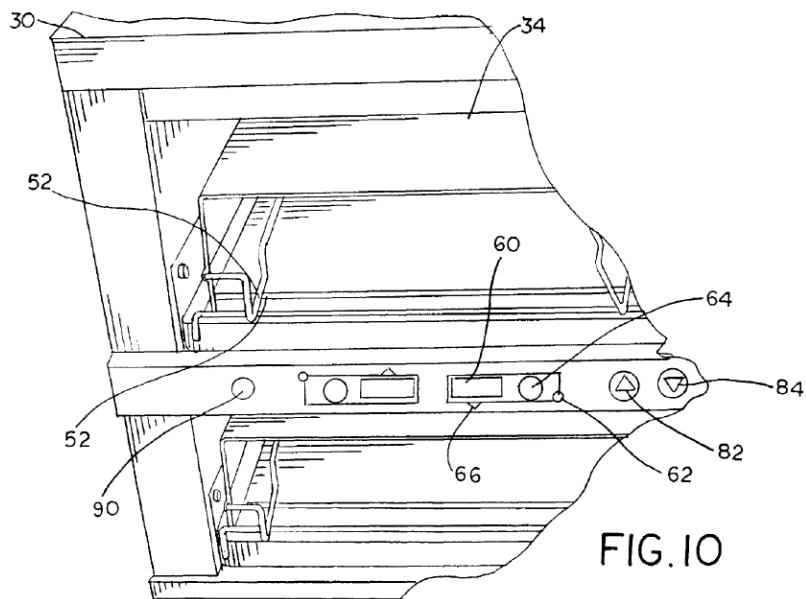
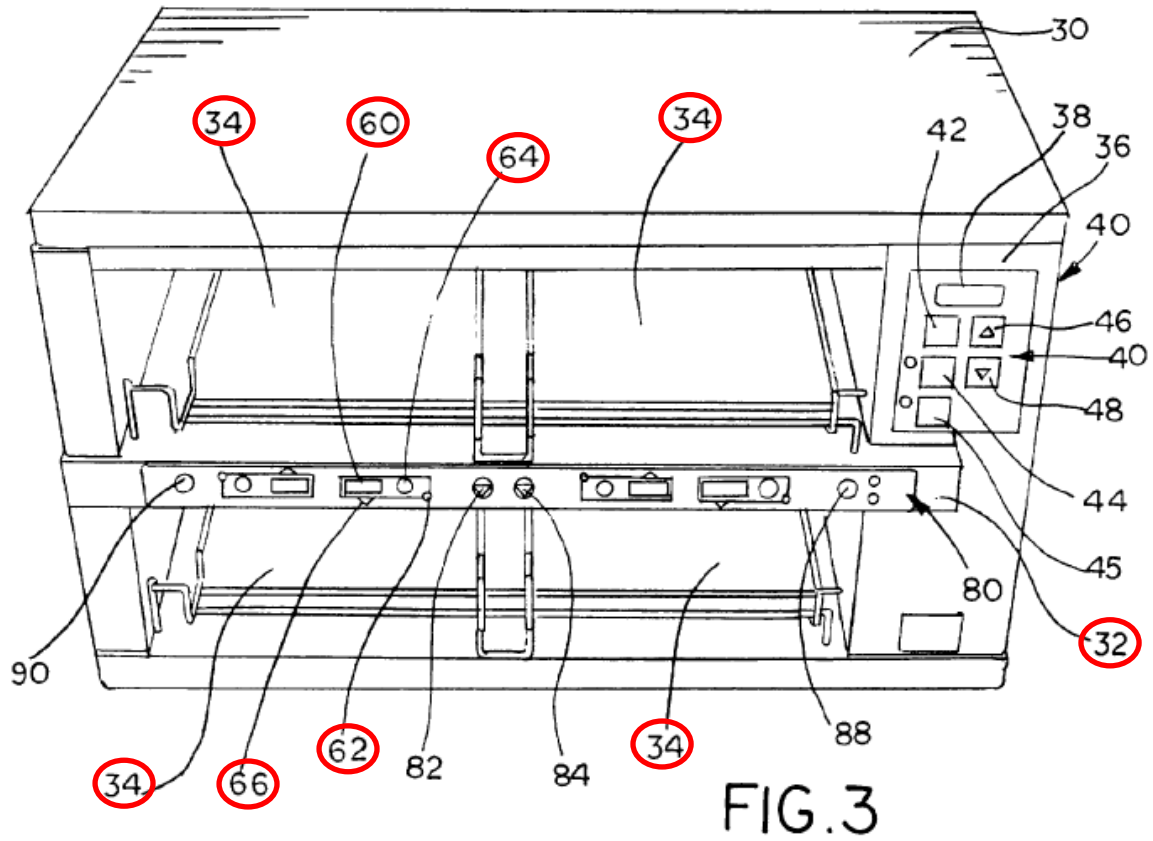
EX1010: ¶¶[0021], [0024], [0027]; EX1003: ¶¶601-603.

4. Modified Controls

Fortmann’748 teaches a generic “input device” and “display” for selecting and displaying temperature. EX1010: ¶[0027]; EX1003: ¶604.

Vaseloff’s display/control groups provide suitable examples of input devices and displays where each bay (34) has a corresponding display/control group comprising a display device (60), timer status indicator (62), and timer button (64).

EX1026: 2:60-63, 3:48-51, 4:5-6, 4:20-33, 4:48-49, 6:51-52, Fig. 4; EX1003: ¶¶605-606.



EX1026.

Per Vaseloff, it would have been obvious to incorporate display/control groups (display device, timer status indicator, timer button, indicator arrow) into Fortmann'748, providing each bay its own group. EX1019: 3:21-23; EX1003: ¶607. This would provide visual association for easier/quicker bay control identification and improved intuitive association of displayed information with a specific bay. EX1026: 4:20-30, 6:51-55; EX1019: 10:5-10; EX1003: ¶¶608-609.

Moreover, Vaseloff's display devices display food type/name ("EGGS") for each bay, and Vaseloff's indicators facilitate food inventory/timing management by indicating food/timer status. EX1026: 4:5-15, 4:48-6:25; EX1003: ¶610.

This applies a known technique (Vaseloff's display/control groups associated with bays) to a known device (Fortmann'748) in the same way with reasonable expectation of success (Vaseloff's display/control groups function similarly to Fortmann'748's input device/display and Vaseloff's "system [] can be applied to any food preparation and storage device"). EX1026: 11:35-38; EX1003: ¶¶611-613.

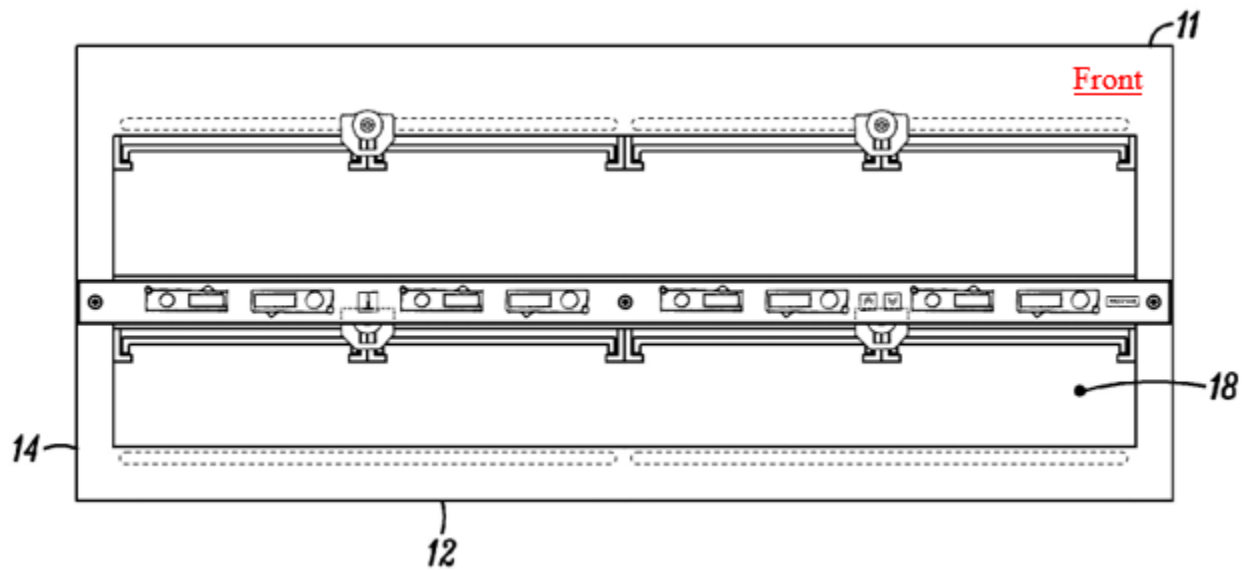
Each Vaseloff display/control group would be connected to Fortmann'748's controller. EX1010: ¶[0027]; EX1026: 2:17-20; EX1003: ¶¶614-615.

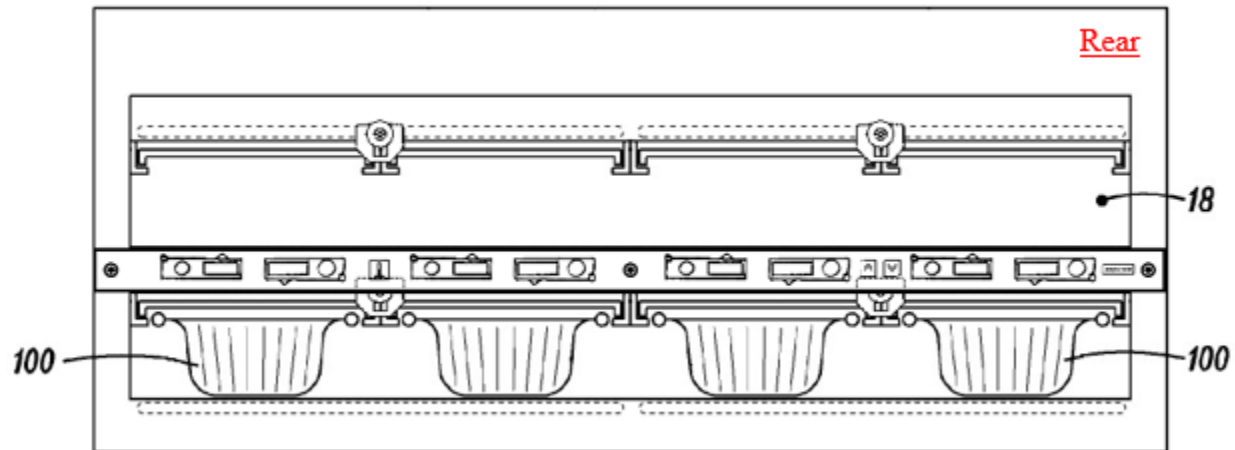
It would have been obvious to arrange Vaseloff's display/control groups on Fortmann'748's pass-through cabinet's front and rear per Fortmann'197, IRHS Documents, and/or McMillan to allow information viewing and bay control from

both sides. EX1005: 8, 20, 25; EX1006: 2; EX1007: 54, 56; EX1008: 61;
EX1014: 3:51-55, 4:25-37; EX1019: 3:44-47, 4:15-17, 5:42-44; EX1024: 11:34-38; EX1029: 5:19-23; EX1003: ¶¶616-617.

This applies a known technique (displays/controls on front and rear) to improve a similar device (Fortmann'748) in the same way (enabling front/rear operator coordination) with reasonable expectation of success (Vaselloff's display/control groups functioning same way). EX1003: ¶¶618-619.

Modification is represented below for the 2x4 configuration. EX1003: ¶620.





EX1010: Figs. 2, 6 (modified).

5. Temperature Control

Fortmann'748's input device allows "the user to select a [zone's] desired temperature" and McMillan provides an example implementation. EX1010:

¶[0027]; EX1003: ¶621.

McMillan teaches bay message areas (183a-d) for displaying food names and actual/setpoint temperatures via temperature key (187) and changing setpoint temperatures via program and arrow keys (184, 185, 188). EX1019: 4:36-59, 10:10-33, 10:43-58; EX1003: ¶¶622-625.

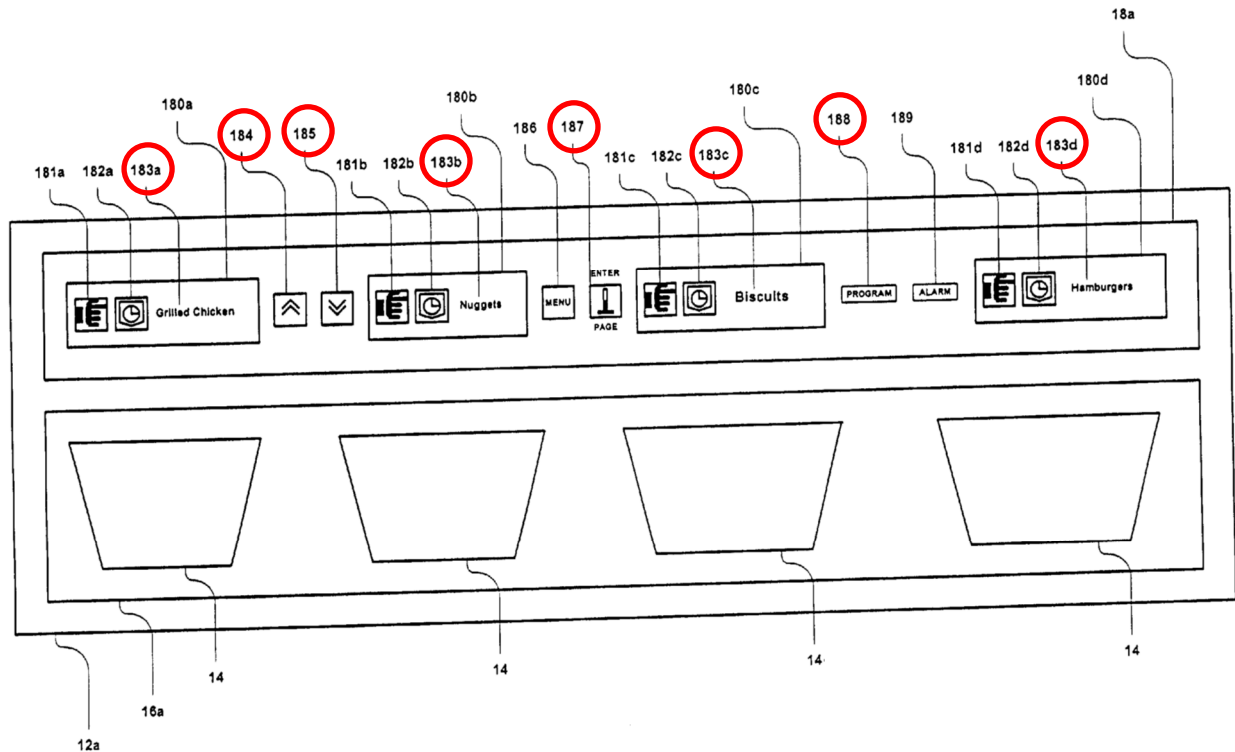


Fig. 5a

EX1019.

Per McMillan, it would have been obvious to modify Vaseloff's display devices (and/or Fortmann'748 programming) to display current and setpoint temperatures in each bay's display device. EX1019: 10:30-32; EX1003: ¶626. Moreover, per McMillan, it would have been obvious to incorporate setpoint temperature controls. EX1019: 10:43-58; EX1003: ¶627.

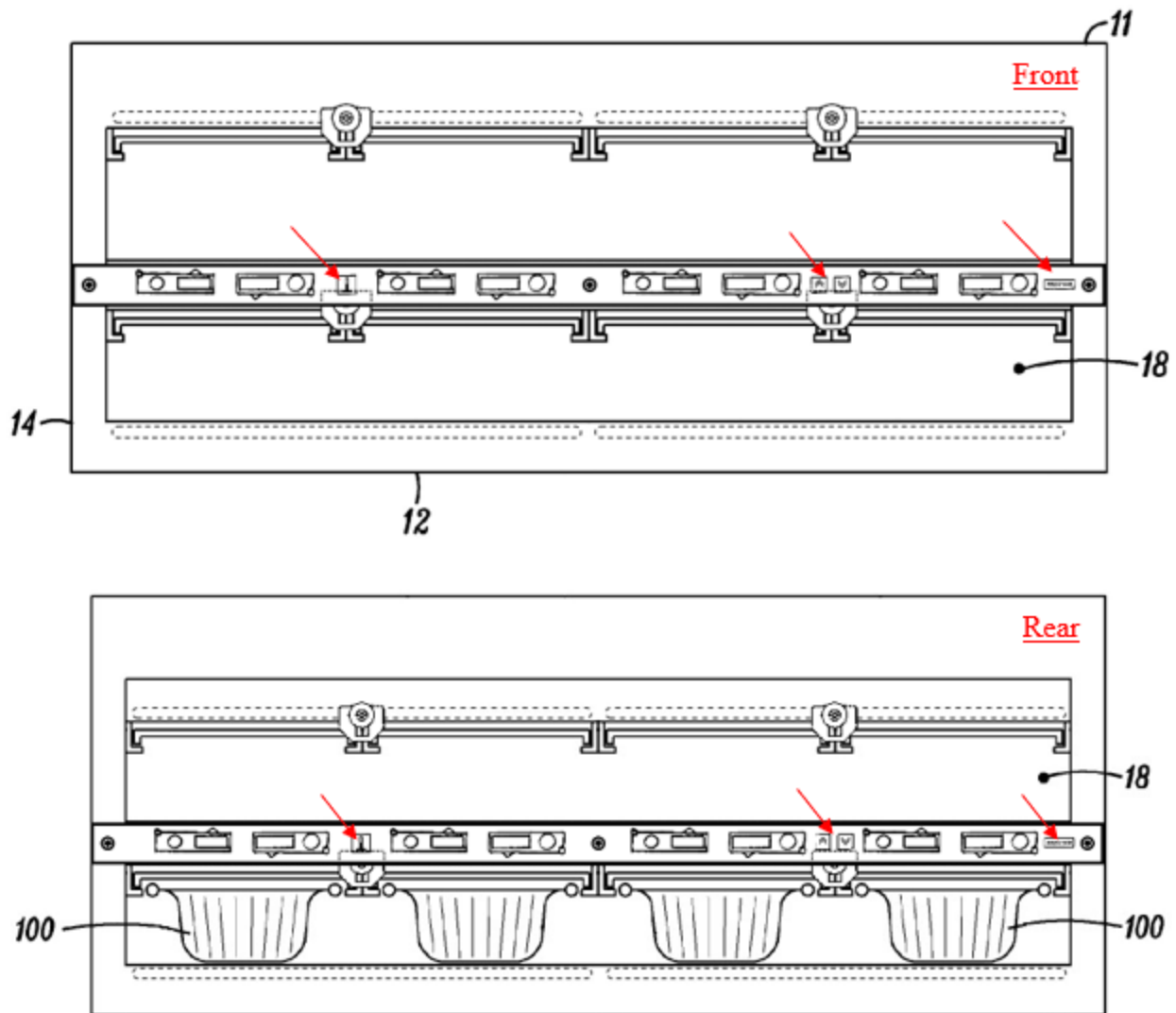
This provides an intuitive way to display the current and setpoint temperatures associated with a bay and change setpoint temperatures. EX1019: 1:29-35, 1:38-49, 10:6-10; EX1026: 4:20-22, 4:25-30; EX1003: ¶628.

POSA would incorporate McMillan's arrow and program keys to view actual and setpoint temperatures and/or to change temperature setpoints. EX1026: 7:30-32; EX1019: 10:46-58; EX1003: ¶¶629. POSA would know how to implement the keys as physical buttons, including connecting McMillan's controls to Fortmann'748's controller. EX1026: 2:60-3:19, 7:29-32; EX1010: ¶¶0027; EX1019: 6:15-19; EX1003: ¶¶630, 635-636.

POSA would program Fortmann'748's controller to permit displaying current and setpoint temperatures in each bay's display and changing the setpoint temperature for individual bays/zones via the arrow, temperature, and/or program buttons, like McMillan. EX1019: 10:6-8, 10:20-33, 10:42-58; EX1003: ¶¶631-634.

This applies a known technique (displaying actual and setpoint temperatures for each bay and changing setpoint temperature) to improve a similar device (Fortmann'748) in the same way with reasonable expectation of success (Vaseloff's displays already show parameter modifications using arrow buttons). EX1026: 4:10-12, 7:26-32; EX1003: ¶¶633-634.

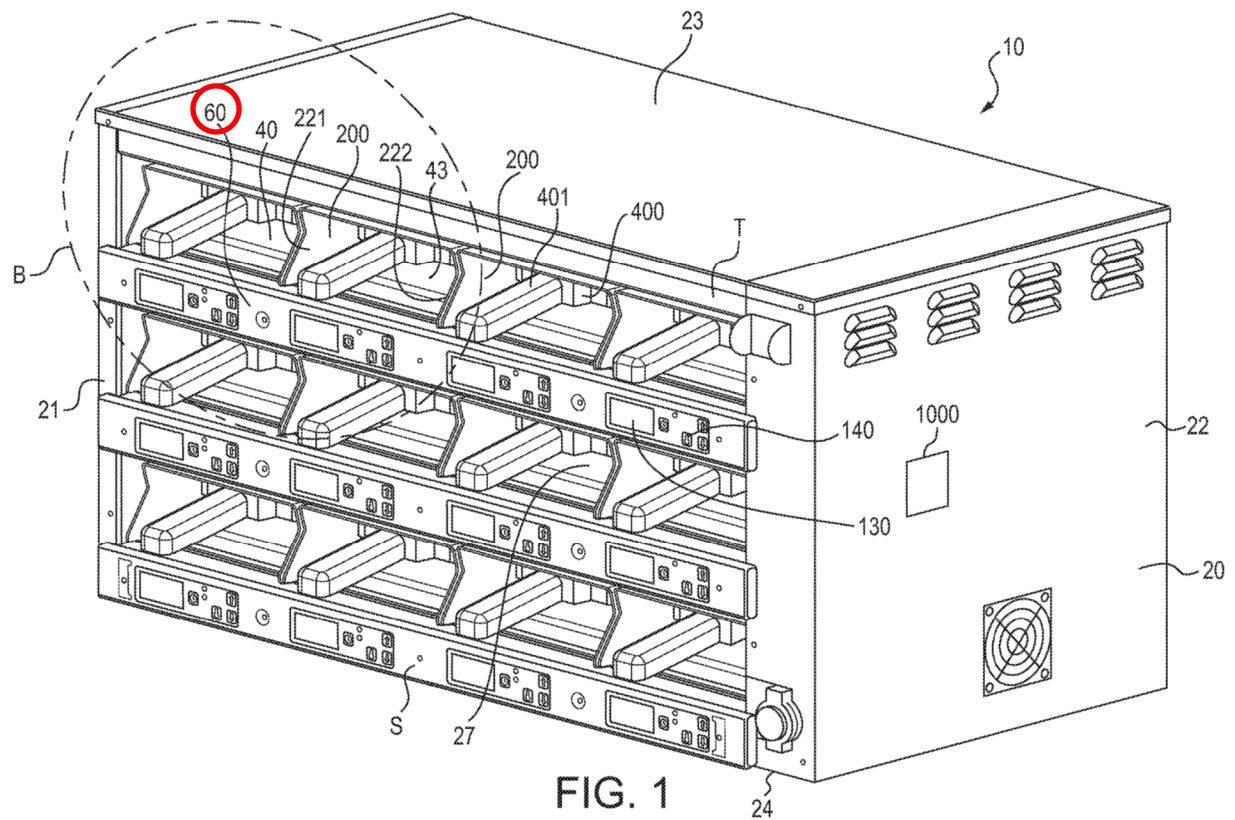
Modification is represented below for the 2x4 configuration. EX1003: ¶¶637.



EX1010: Figs. 2, 6 (modified).

6. Timer Bar/Bezel

Fortmann'197 and IRHS Documents teach front and rear control/timer bars (60) with displays/inputs (130, 140) spaced from shelves (40). EX1014: 2:58-59, 3:28-30, 3:51-56, 4:18-37, Fig. 3; EX1005: 4, 8, 20, 25; EX1006: 1; EX1007: 28, 32, 51; Section IV; EX1003: ¶¶638-642.



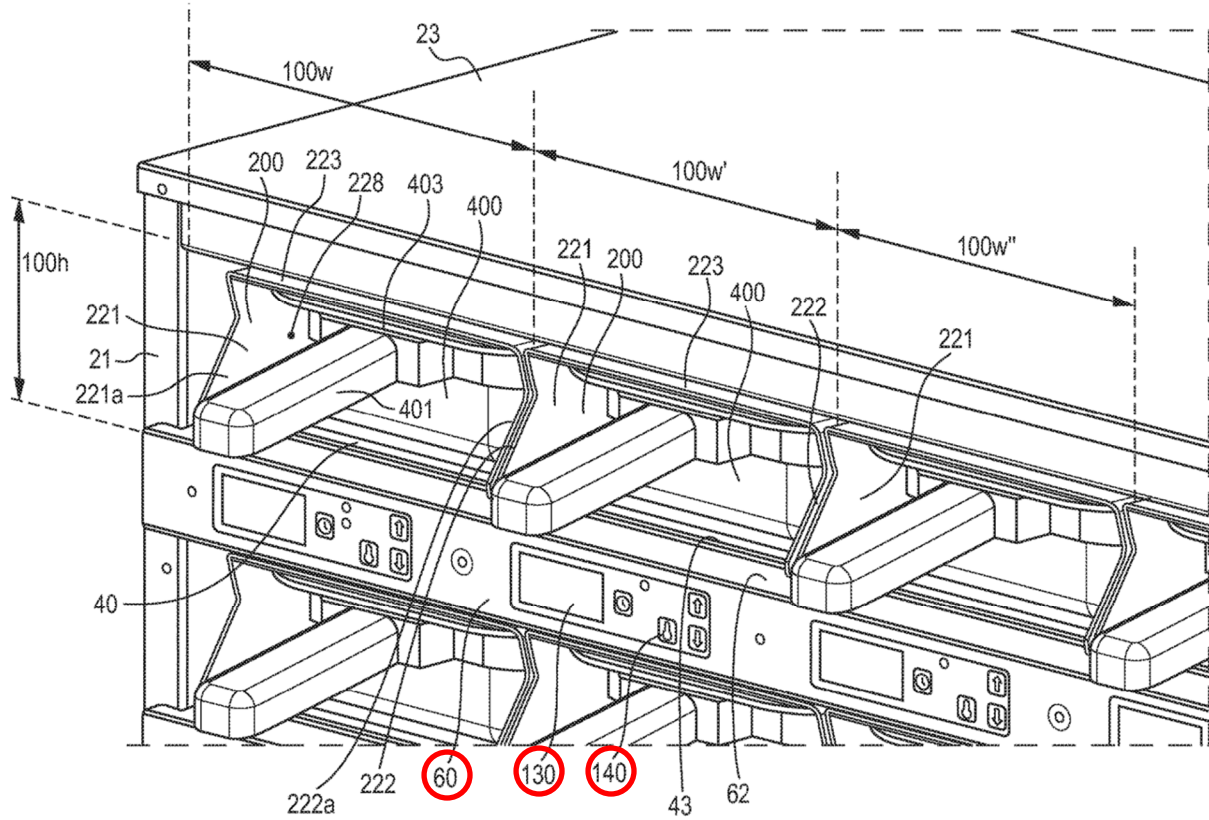


FIG. 2

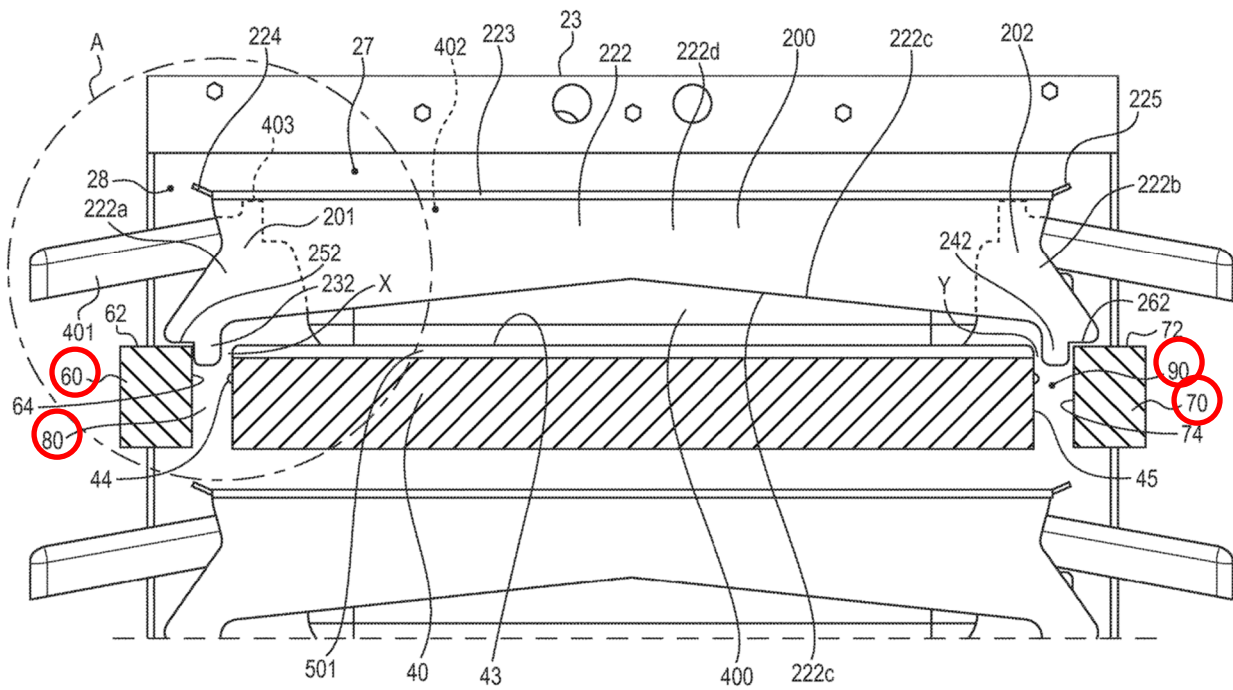
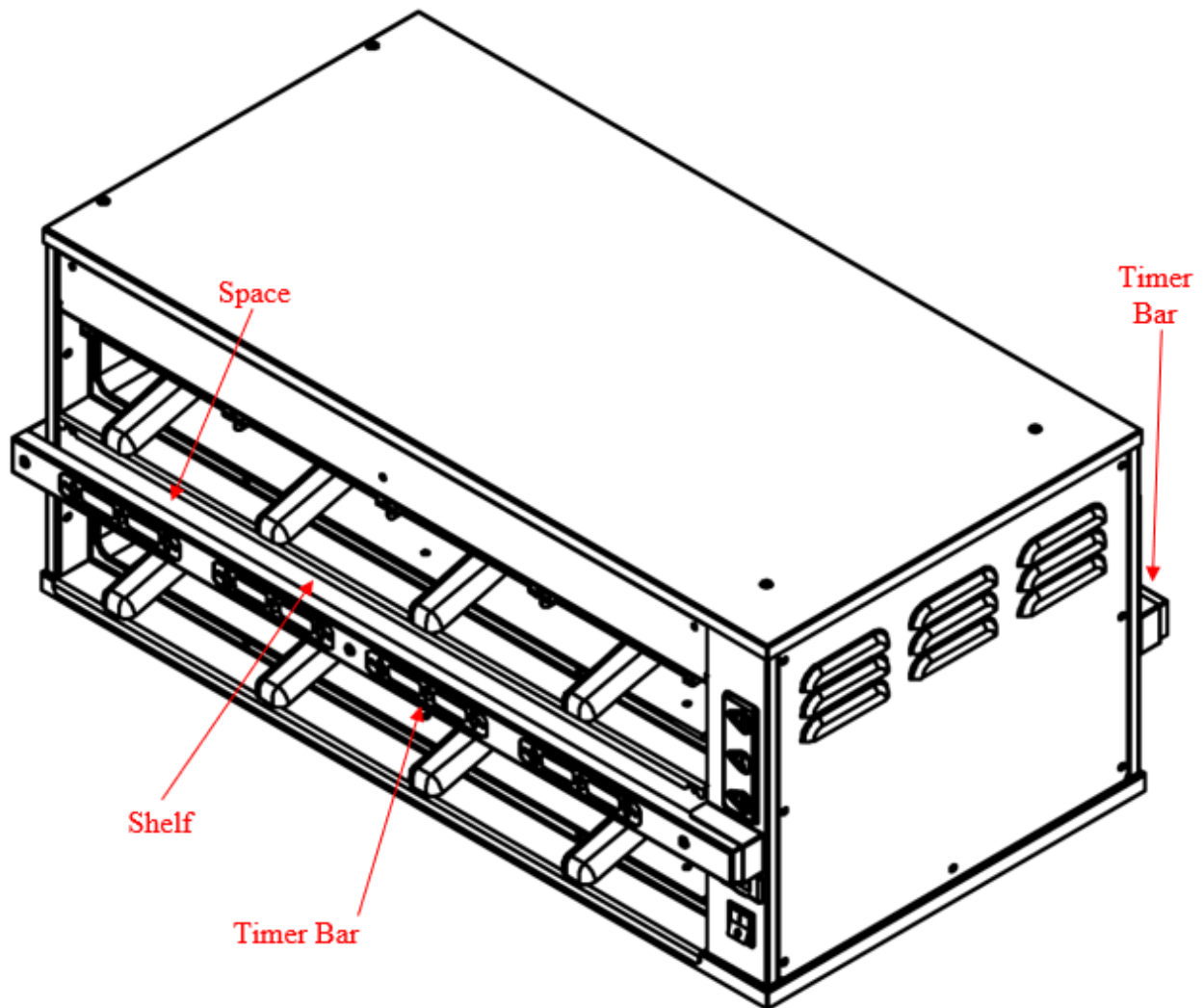
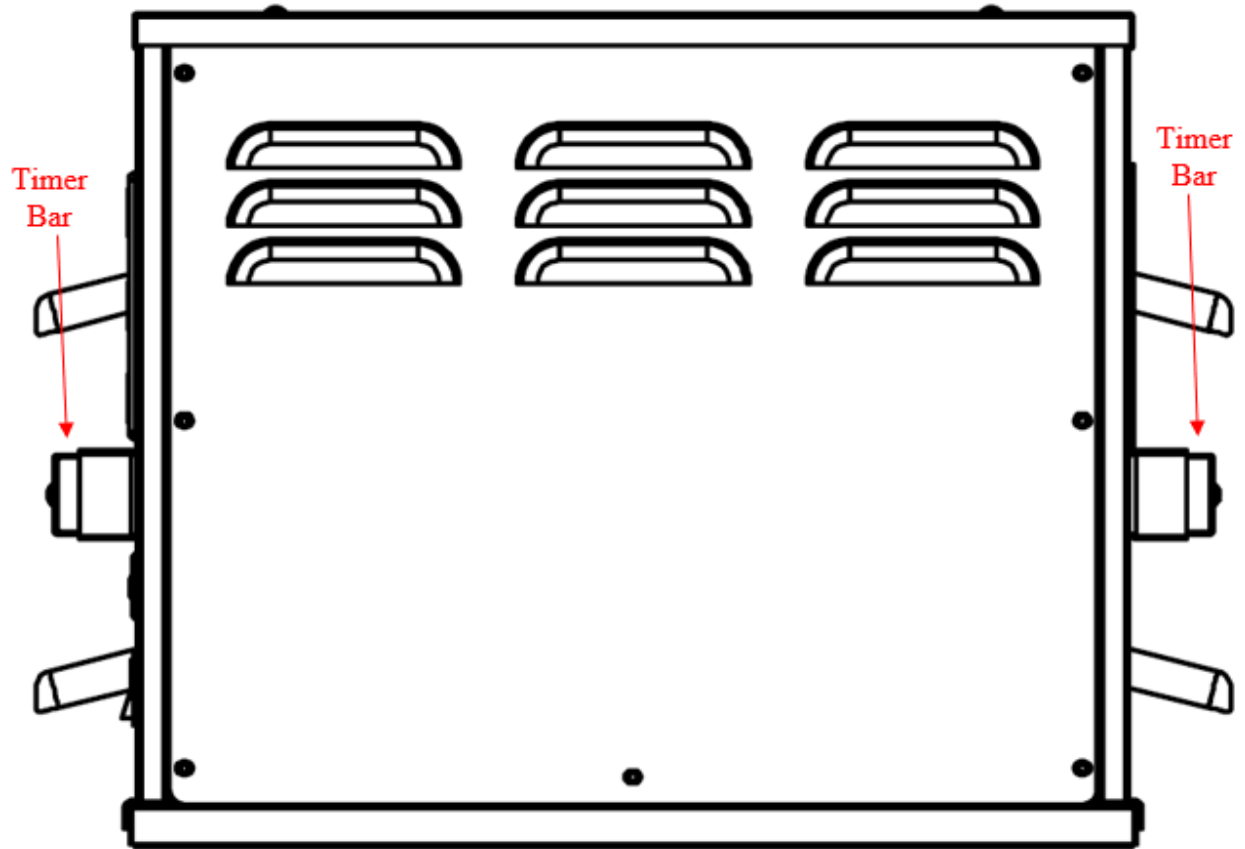
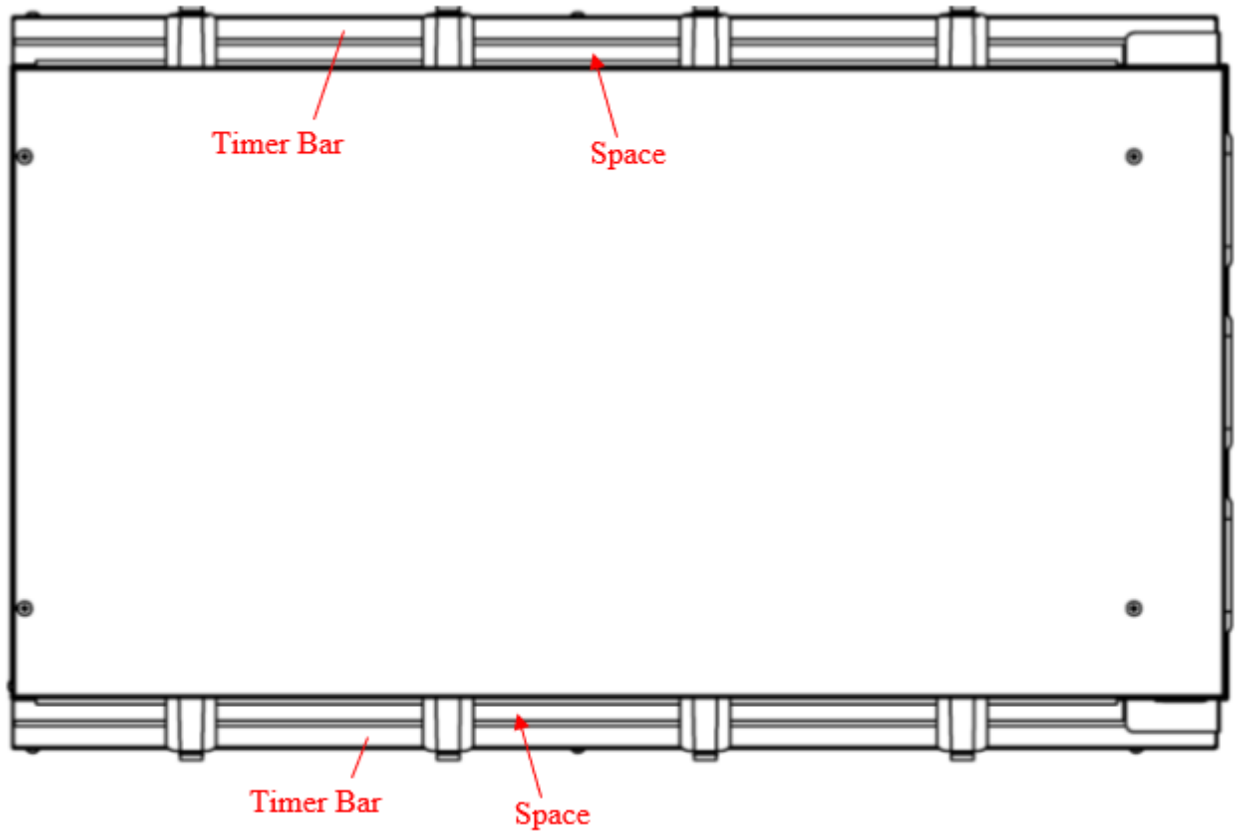


FIG. 5

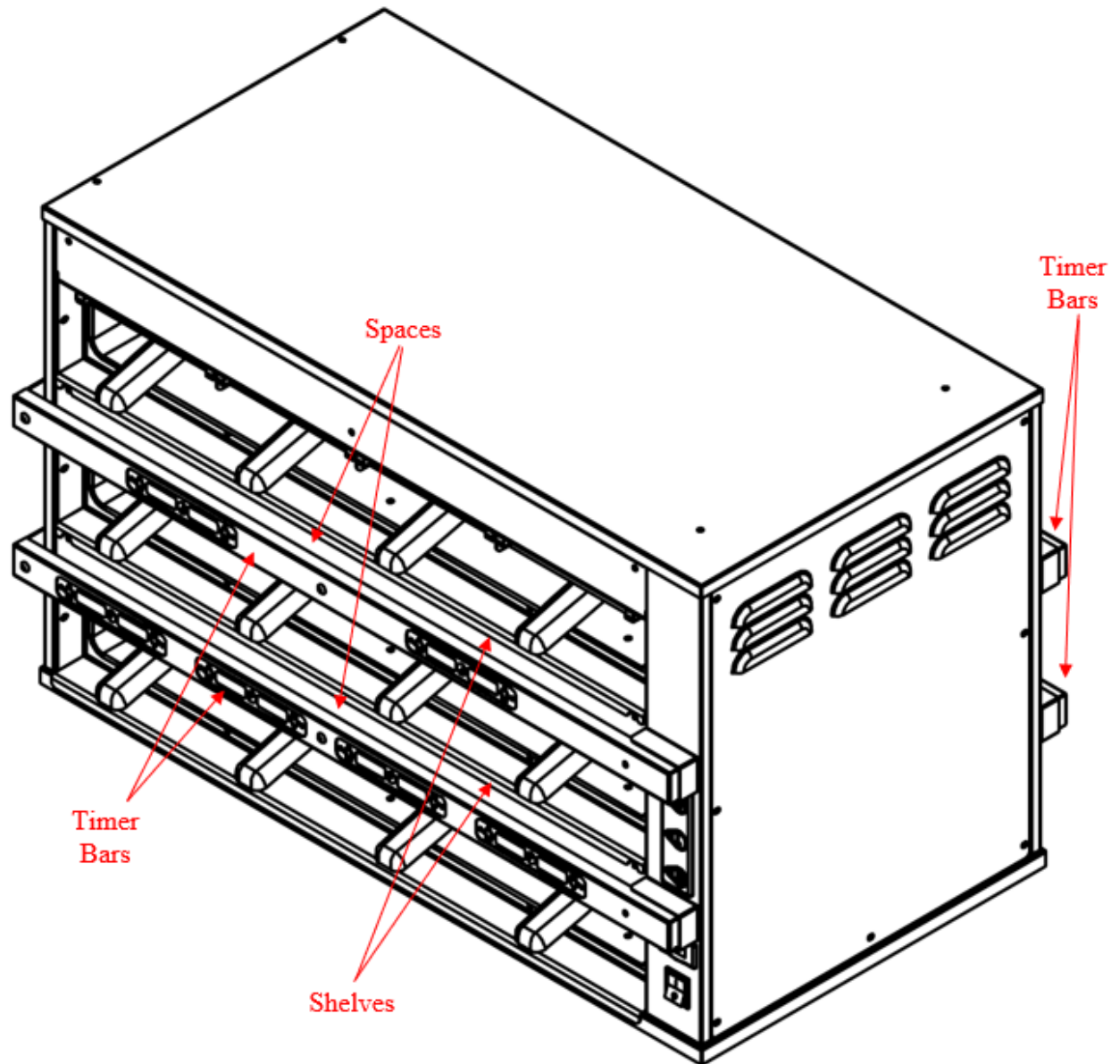
EX1014.

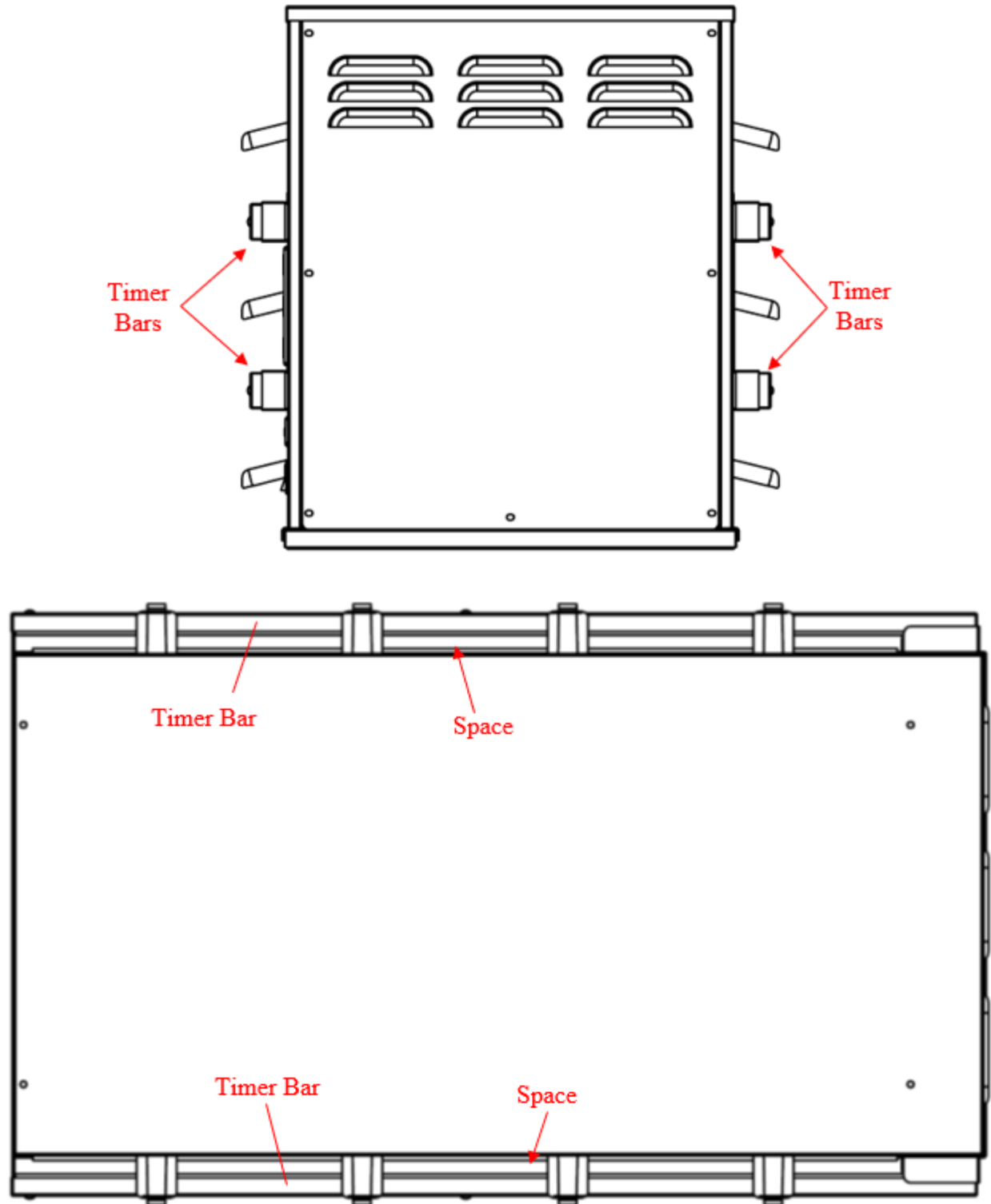






EX1005: 8.



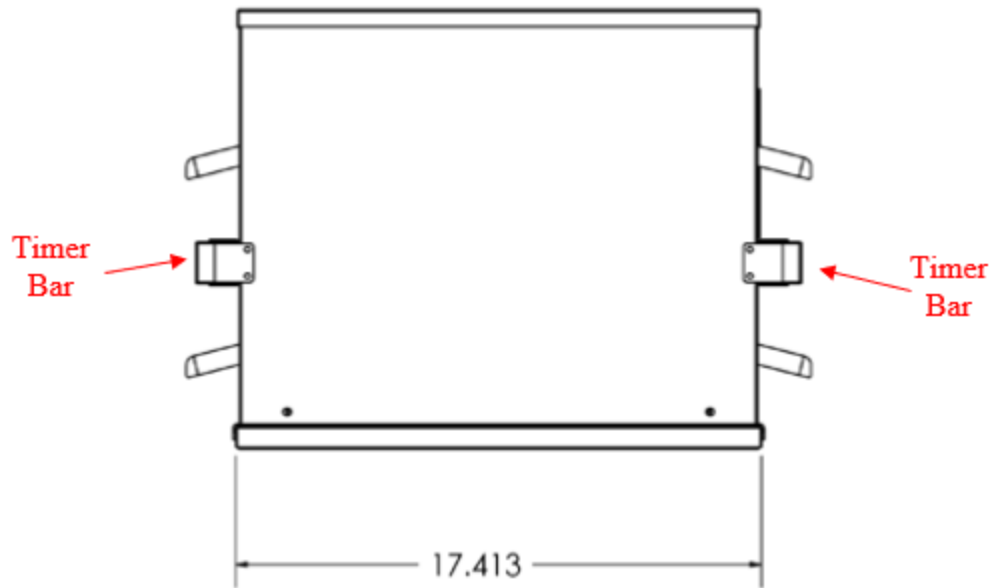


EX1005: 9.



EX1005: 17 (unannotated).

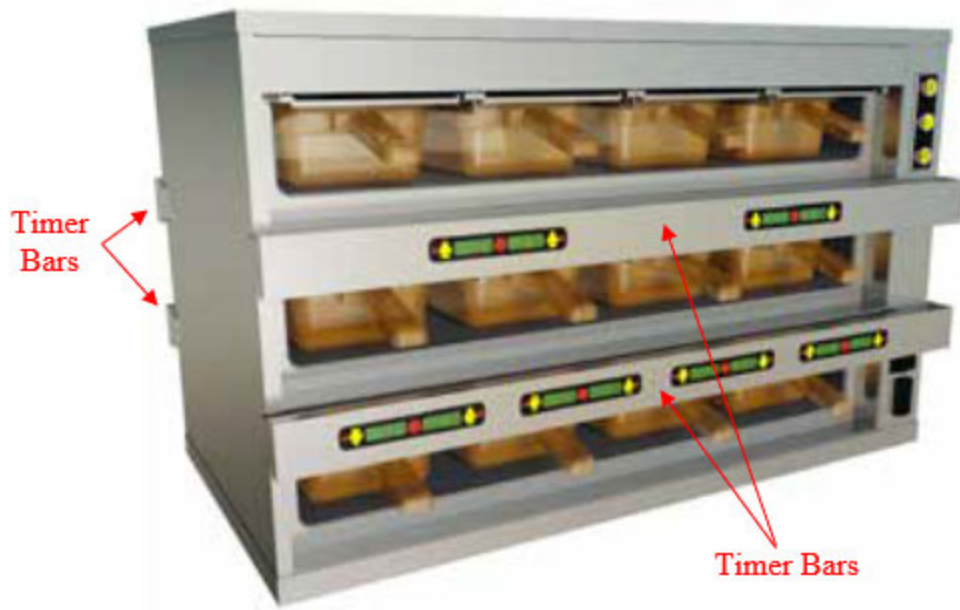
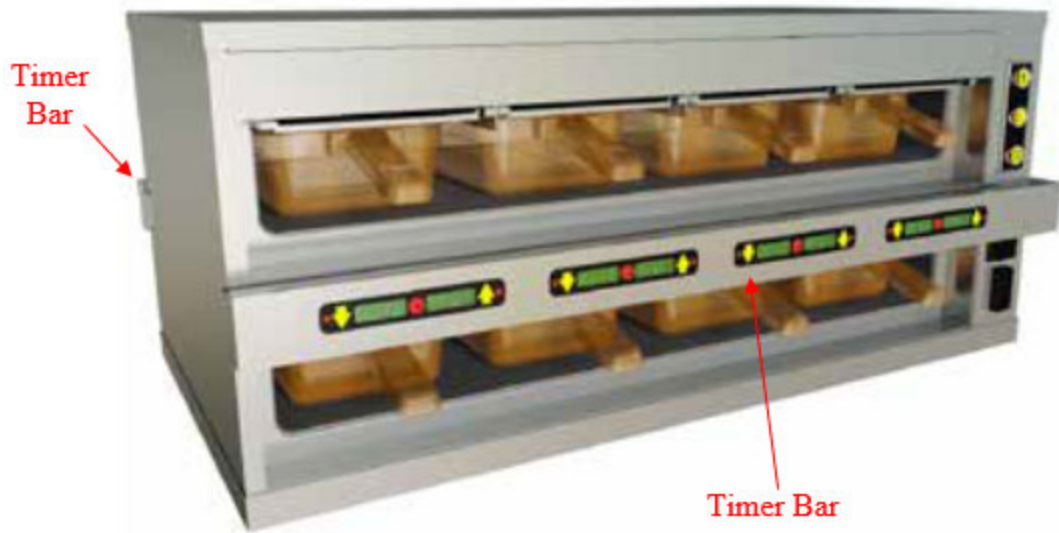




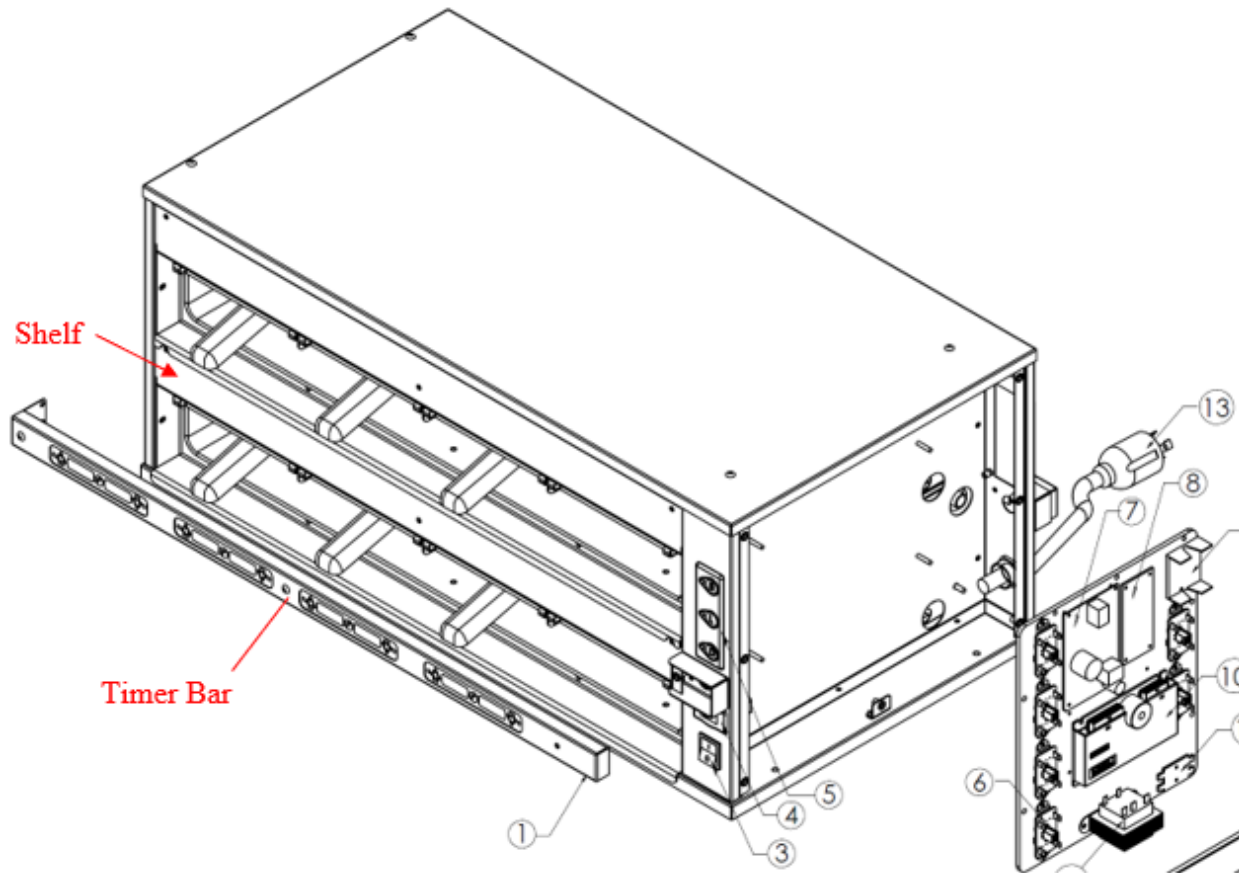
EX1006: 1-2.



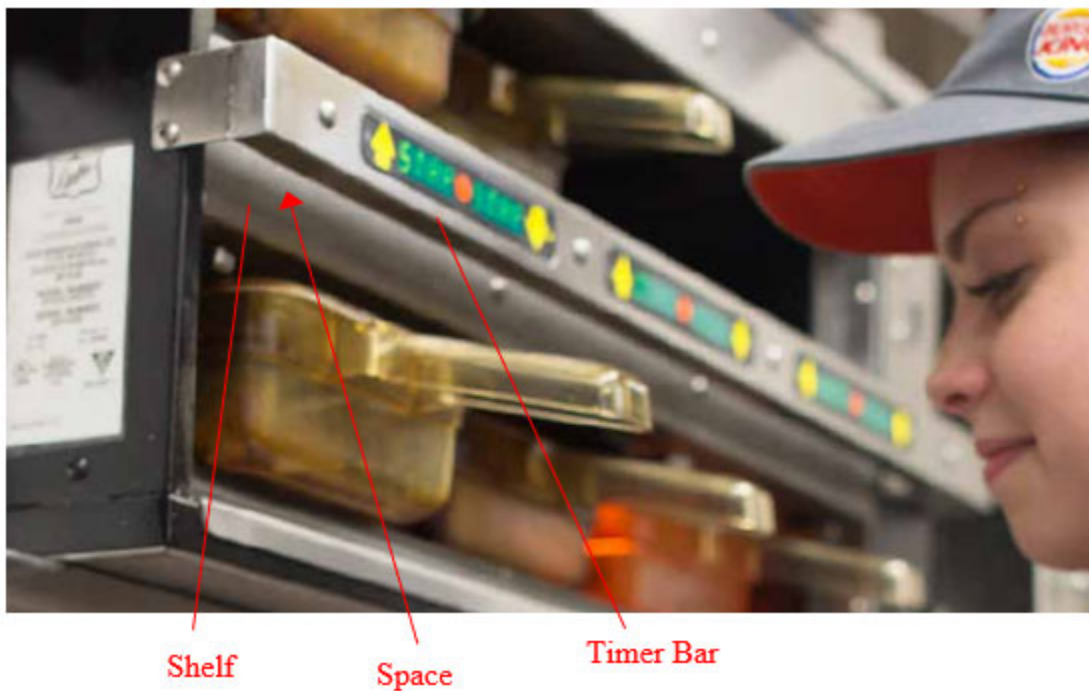
Timer Bar



EX1007: 52, 56.



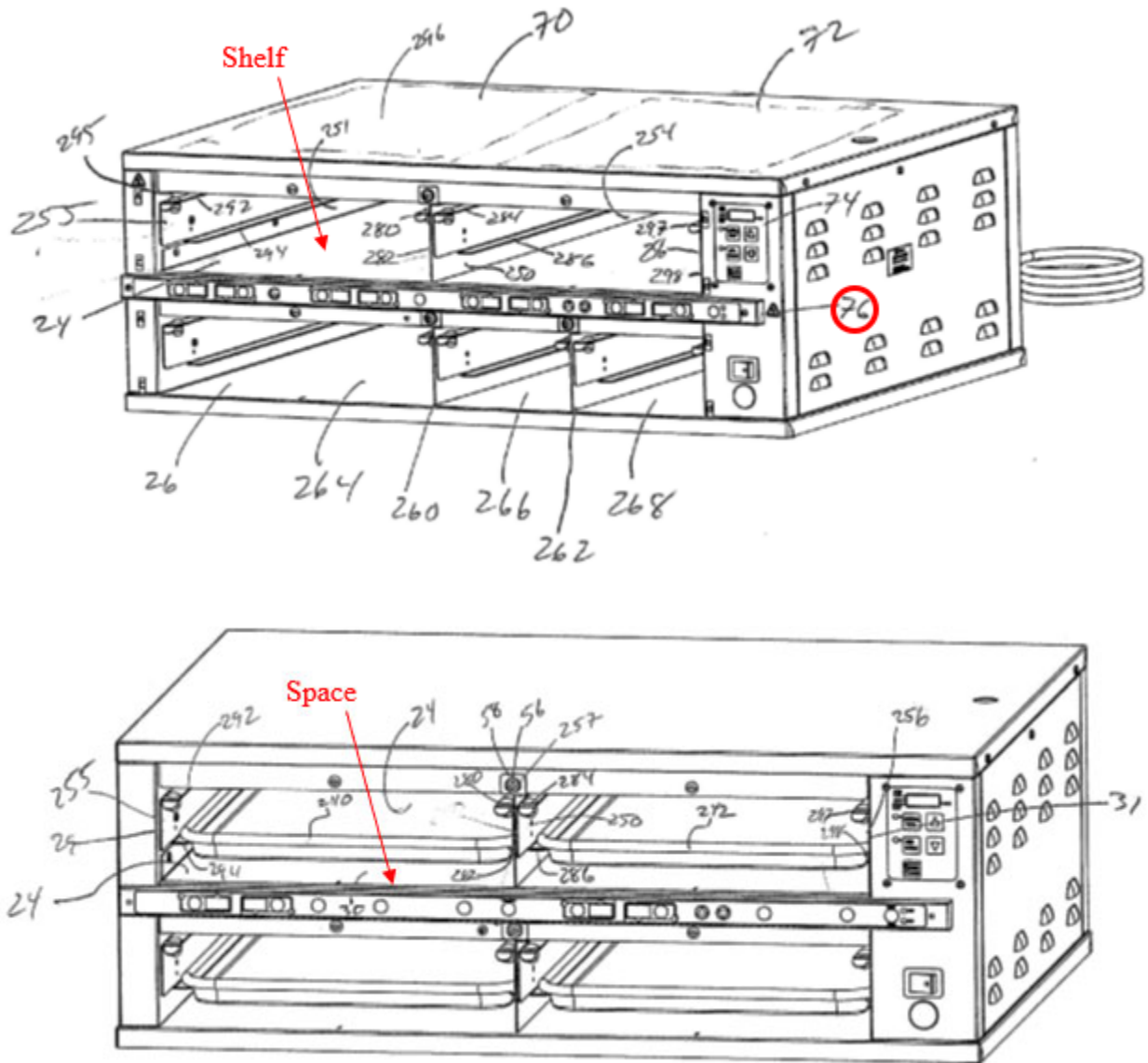
EX1005: 19.

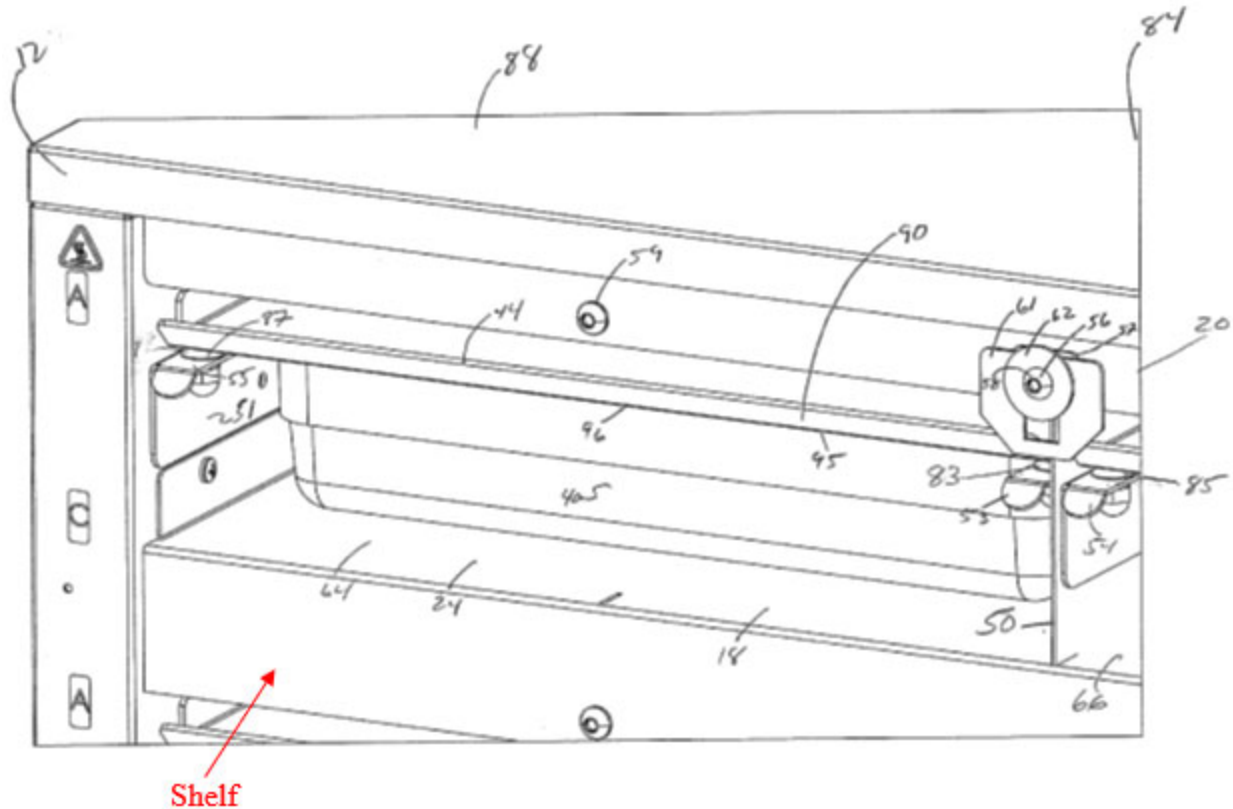


EX1007: 28.

Hartfelder teaches a display/control bar (76) spaced forward from a shelf.

EX1003: ¶643.





EX1013: Figs. 3, 4, 9.

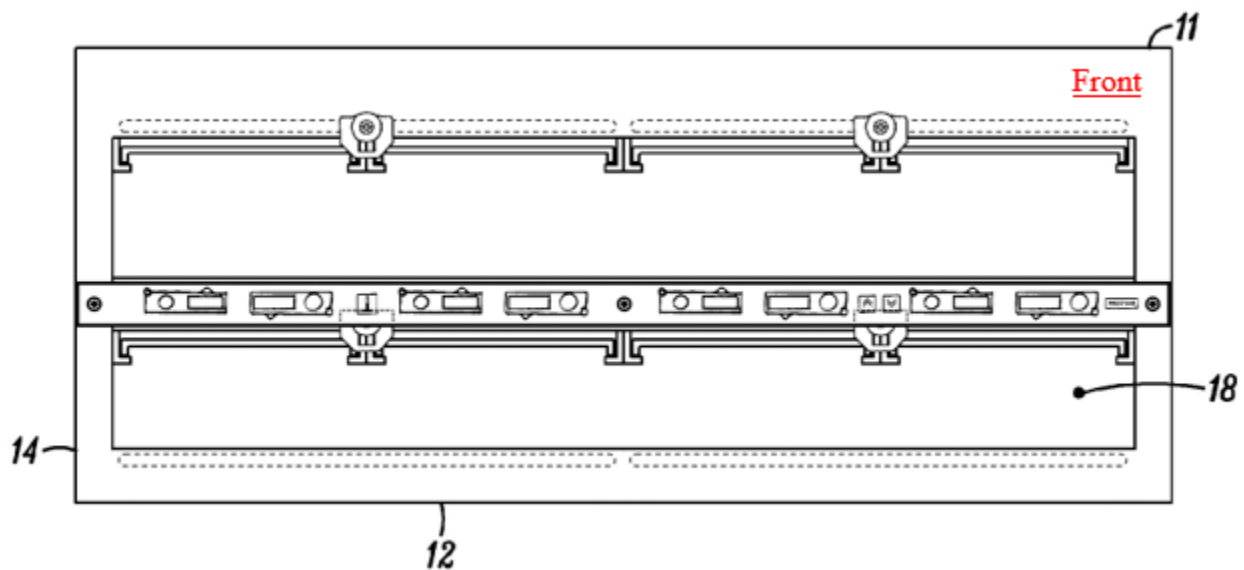
Per Fortmann'197, IRHS Documents, and/or Hartfelder, it would have been obvious for Fortmann'748 to include Vaseloff's display/control groups and McMillan's buttons/keys in front and rear timer bar housings spaced forward/rearward from Fortmann'748's shelf or front/rear face. EX1003: ¶644.

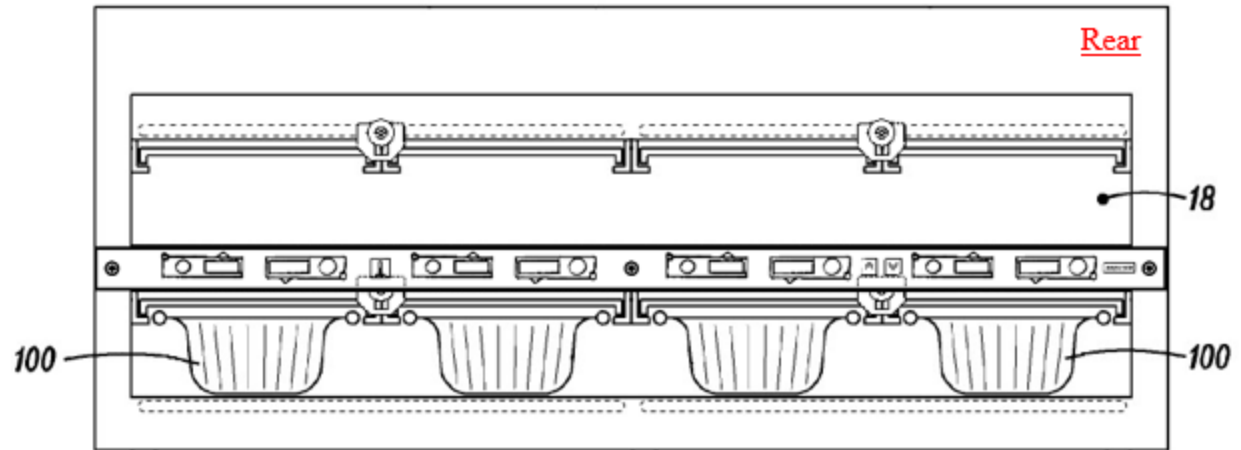
This would protect timer bar electronics from heat, allow cooling air flow, prolong the electronics' life, and facilitate access to electronics for maintenance, repair, and/or replacement. EX1008: 12-15; EX1013: Figs. 1-4, 9; EX1019: 3:52-57; EX1029: 2:4-11, 5:41-49; EX1014: 3:32-36; EX1003: ¶¶645-646.

This applies a known technique (front and rear spaced timer bars) to improve a similar device (Fortmann'748) in the same way with reasonable expectation of success (functionality of controls unchanged). EX1003: ¶¶647-648.

POSA would attach the front and rear timer bars to Fortmann'748's chassis proximate the front and rear faces, respectively, per Fortmann'197, IRHS Documents, and/or Hartfelder. EX1005: 8; EX1006: 1; EX1007: 28, 52, 56; EX1008: 12; EX1013: Fig. 3; EX1014: Figs. 1-3; EX1003: ¶¶649-650.

Modification is represented below for the 2x4 configuration. EX1003: ¶651.





EX1010: Figs. 2, 6.

7. Discrete Lids for Each Pan Holding Location

Fortmann'748 has removeable lids (40). EX1010: ¶[0017]; EX1003: ¶¶652-653.

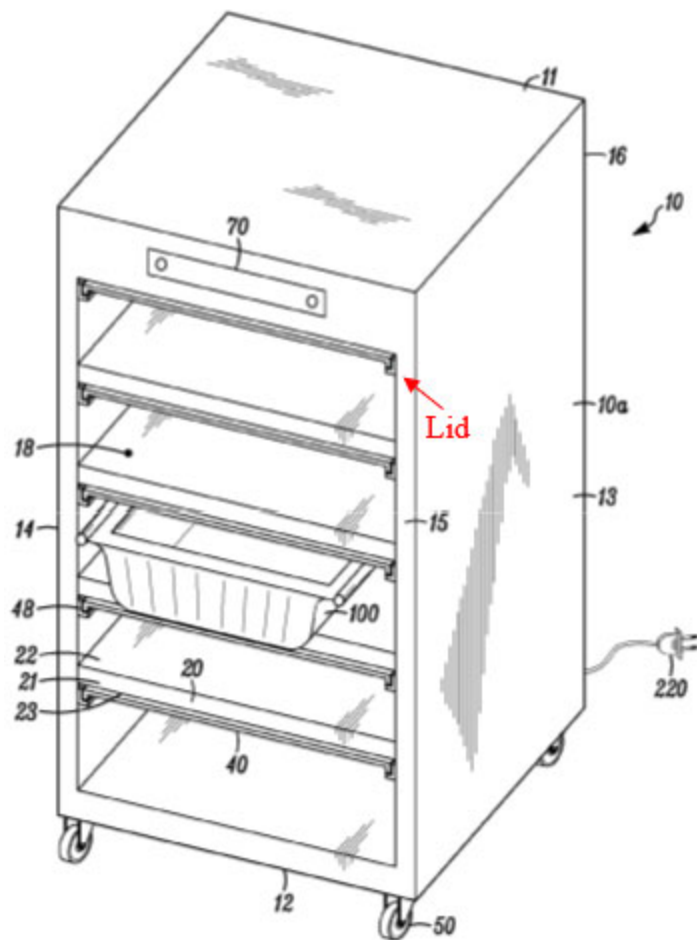


FIG. 1

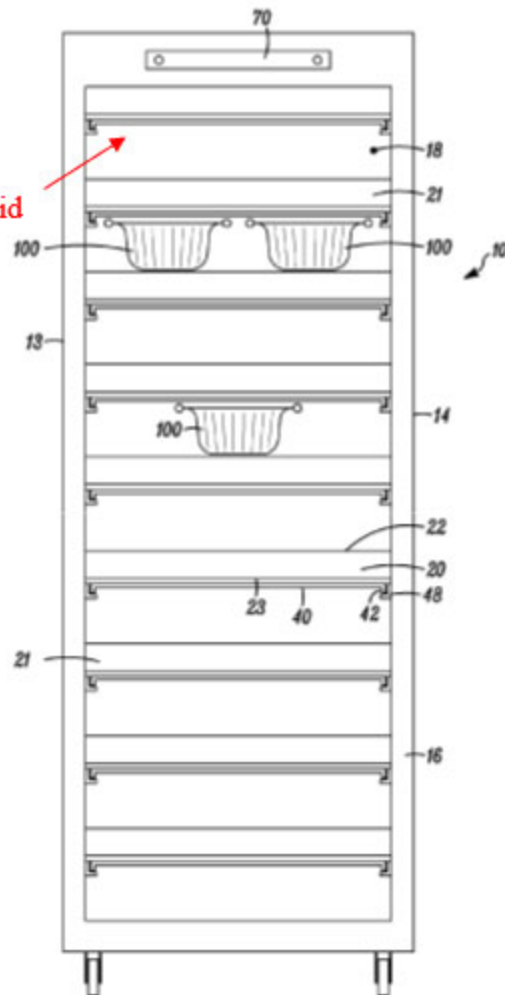
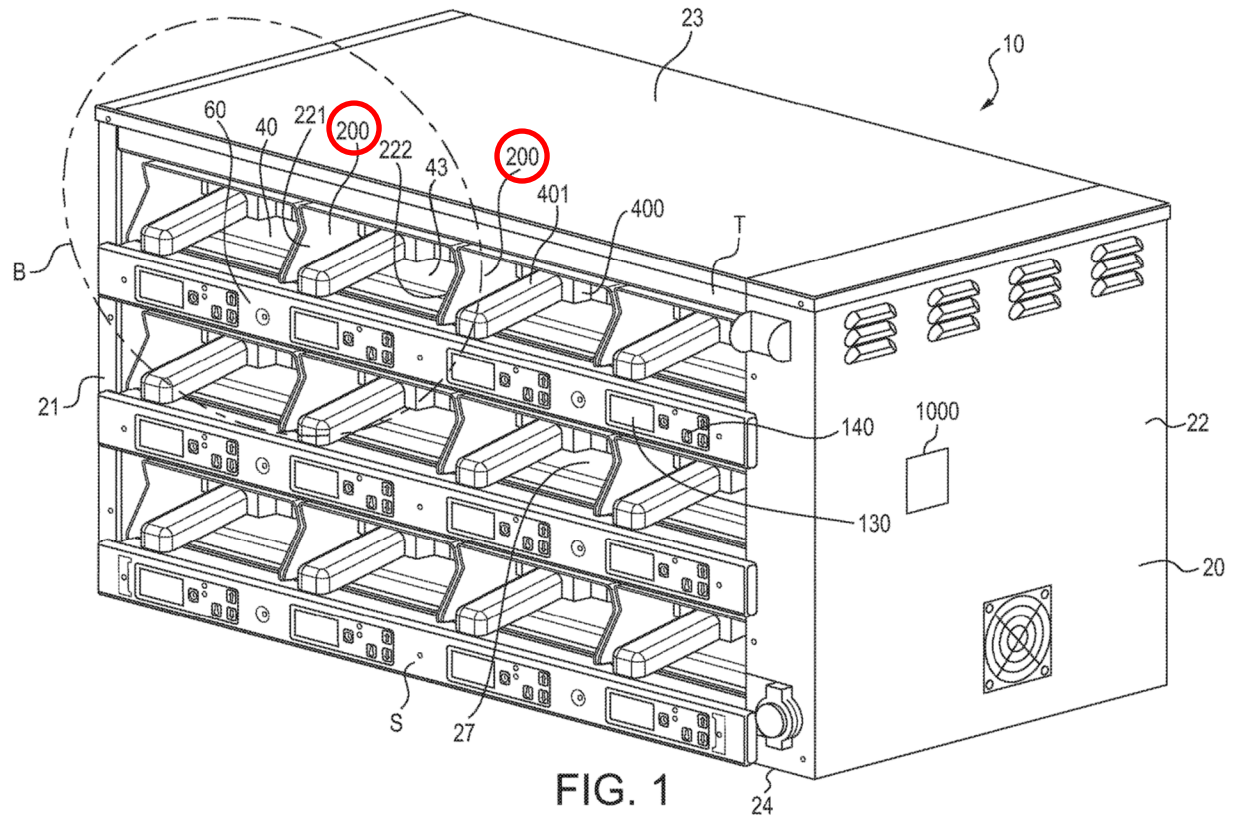


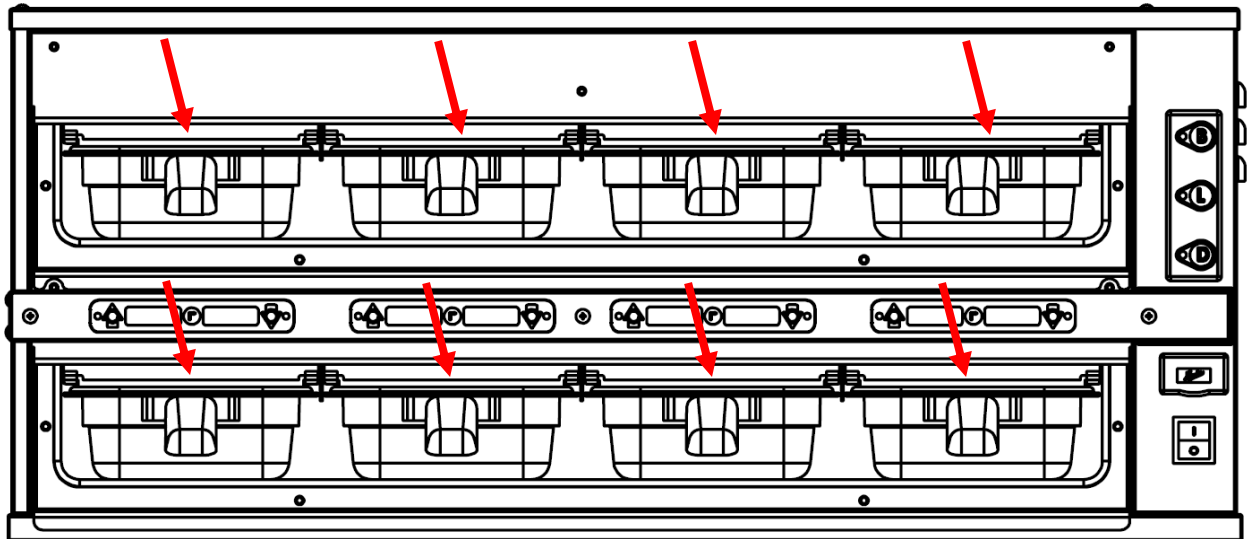
FIG. 6

EX1010.

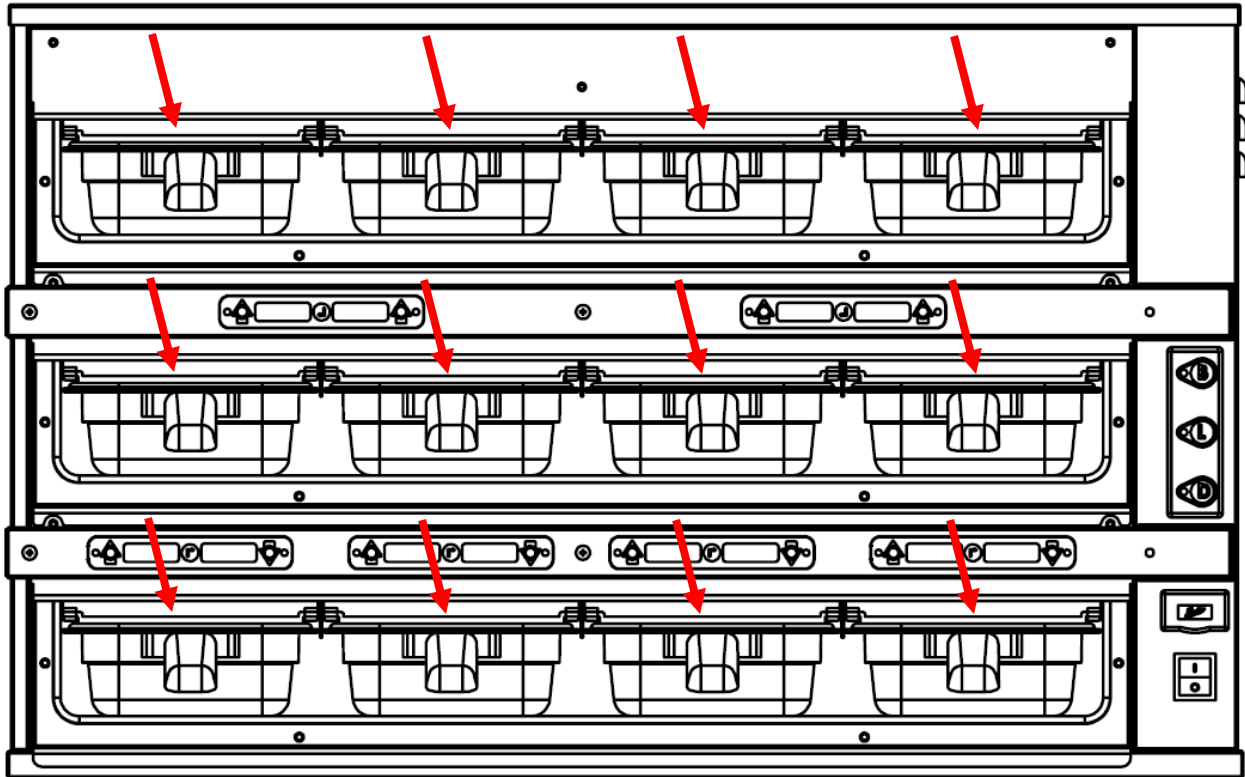
Jones, Fortmann'197, and IRHS Documents disclose discrete lids per pan/bay. EX1012: ¶[0072], Fig. 1B; EX1014: 4:50-53, Figs. 1-4; EX1005: 8; EX1006: 1-2; EX1007: 53, 58; EX1014: 7:31-32; EX1003: ¶654.



EX1014.



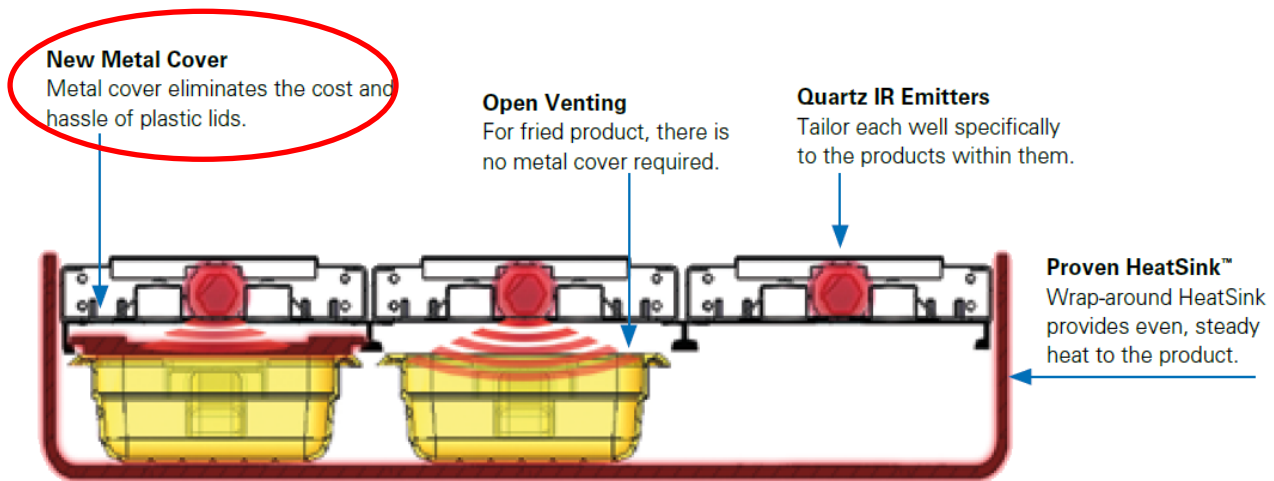
EX1005: 8.



EX1005: 9.



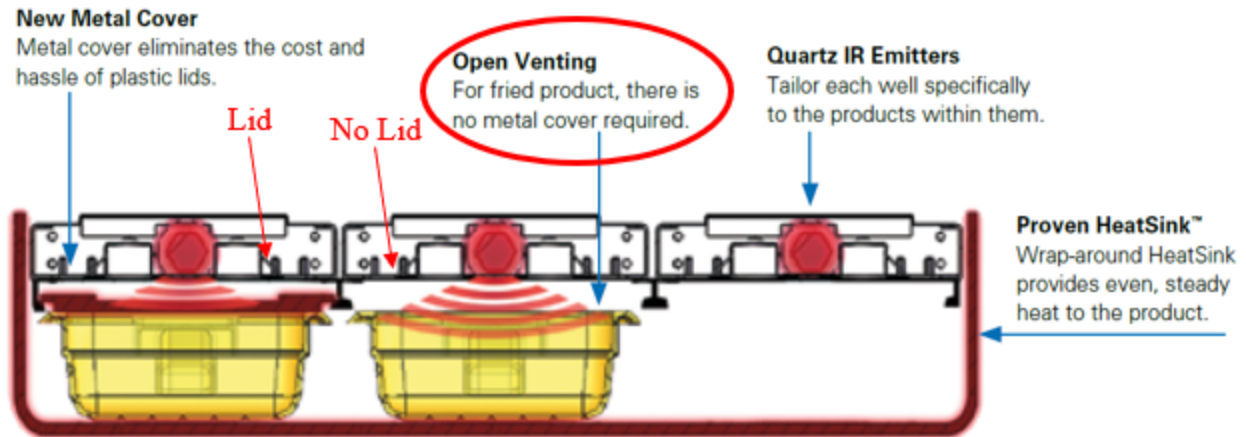
EX1006: 2.



EX1007: 53.

Per Jones, Fortmann'197, and/or IRHS Documents, it would have been obvious to provide a discrete lid per pan/bay. EX1003: ¶655. Implementing this with Fortmann'748 would further the goal of providing "zones" for different food types by accommodating food types with differing temperature/moisture sensitivities simultaneously by removing/installing. EX1010: ¶¶[0024], [0027]; EX1003: ¶¶656-658. Installing lids on bays with non-fried foods holds moisture, while removing lids for fried foods permits venting. EX1007: 53; EX1014: 7:50-67; EX1016: ¶[0003]; EX1017: 6:45-48; EX1003: ¶657-658, 660.

This would provide more food placement flexibility, better venting/sealing control, and increased holding diversity (temperature/sealing/venting). EX1007: 53; EX1019: 1:36-39, 1:43-45; EX1003: ¶659.



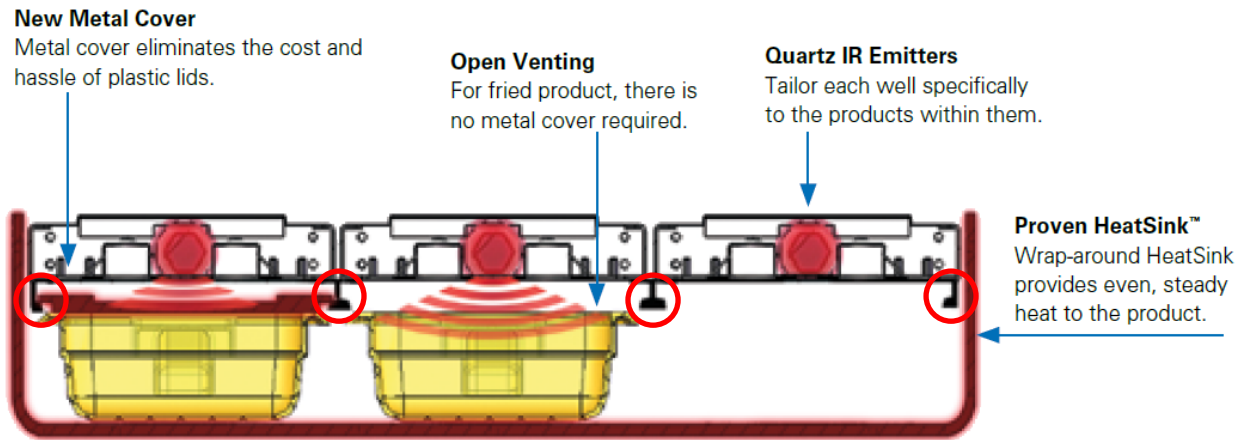
EX1007: 53.

Discrete lids would be easier to move and clean, and improve pan sealing.

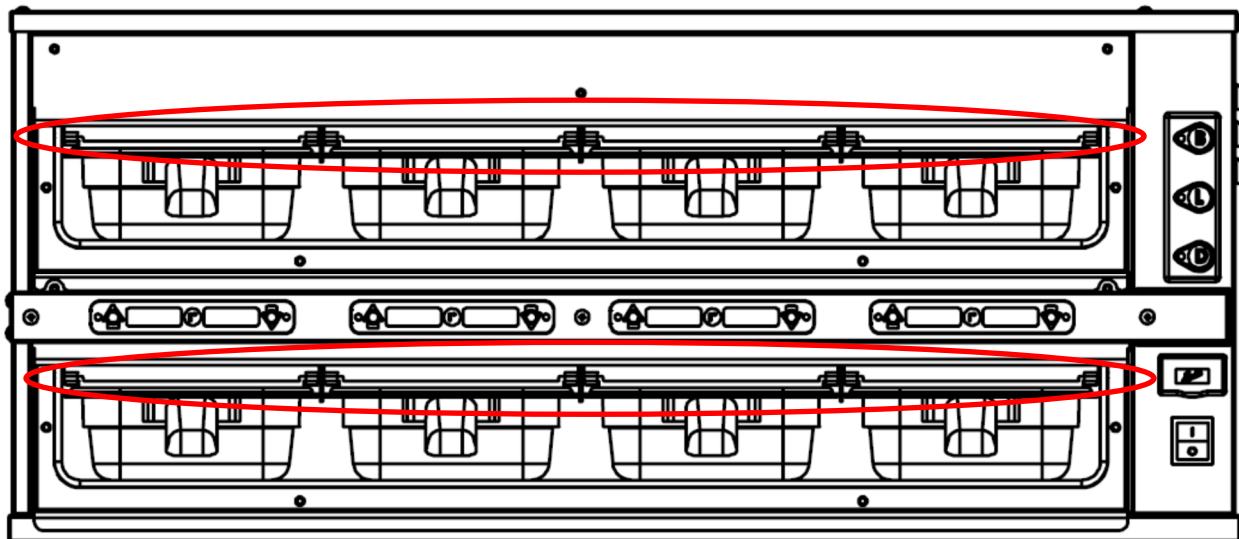
EX1007: 10, 21, 58; EX1003: ¶¶661-662.

This merely requires duplicating and/or resizing Fortmann’748’s lids and tracks to hold the lids. *Harza*, 274 F.2d at 671 (“duplication of parts has no patentable significance”); EX1003: ¶663.

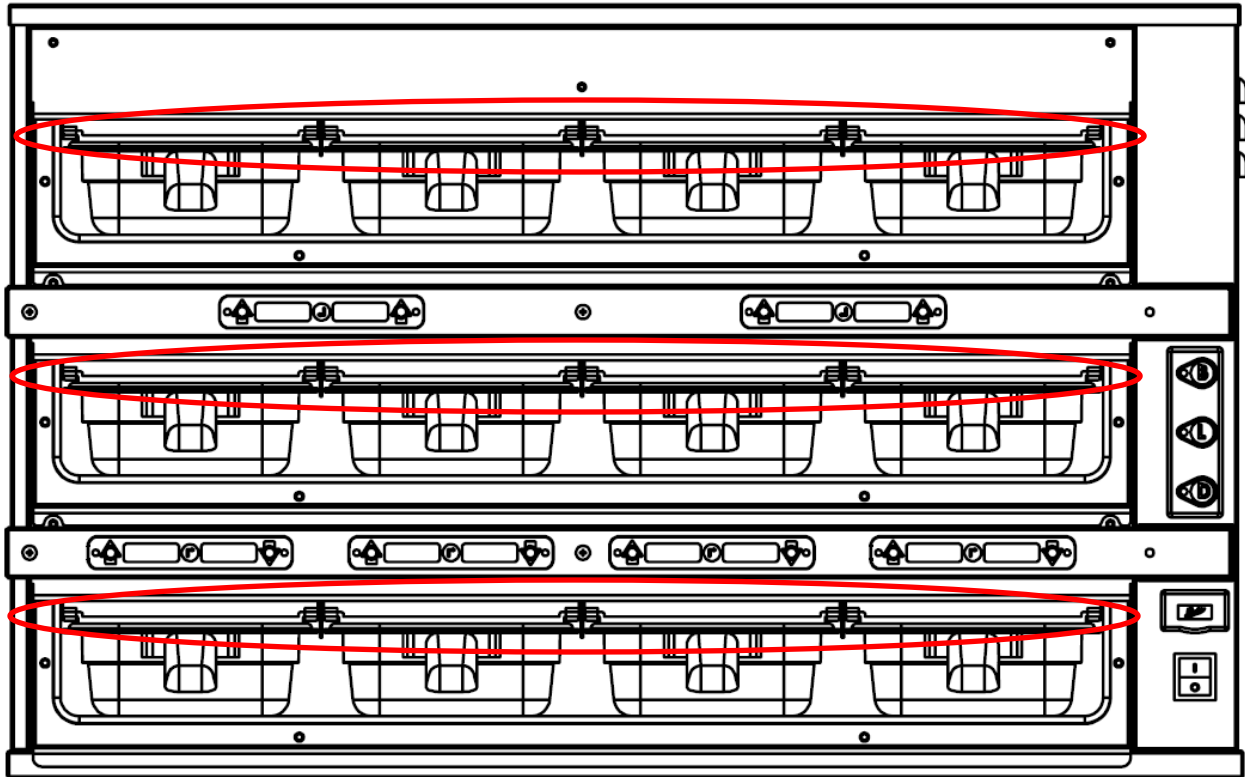
Per IRHS Documents, POSA would duplicate Fortmann’748’s tracks across the compartments to support individual lids, the duplicated tracks being secured to overlying structure per Fortmann’748 and/or IRHS Documents. EX1005: 4, 8, 20-21; EX1007: 53, 56, 58; EX1010: ¶[0018]; EX1003: ¶¶664-666, 669.



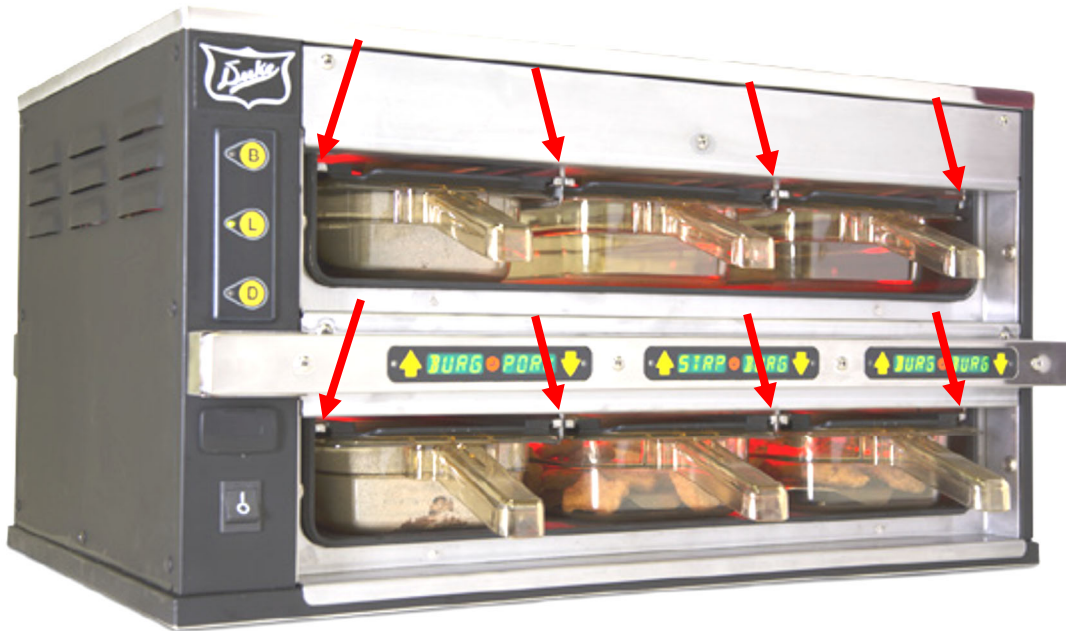
EX1007: 28.



EX1005: 8.



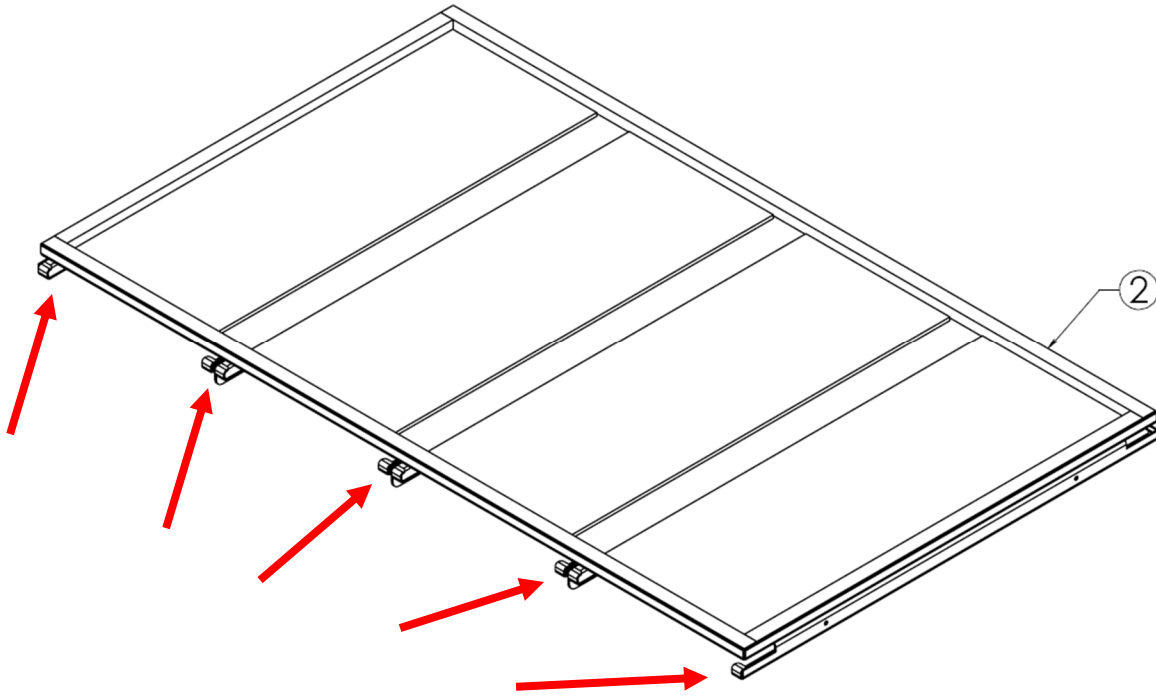
EX1005: 9.



EX1006: 2.



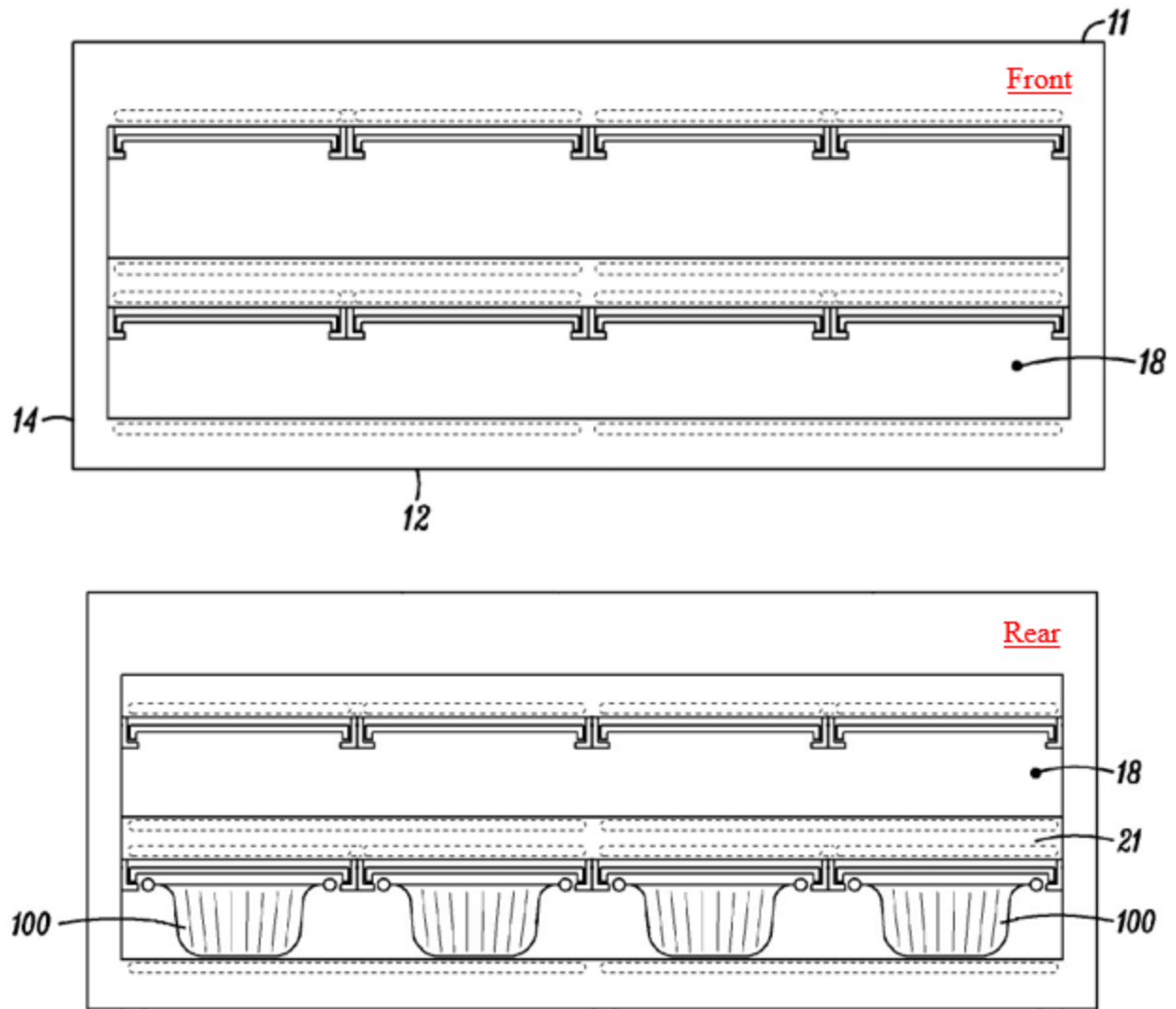
EX1007: 52.



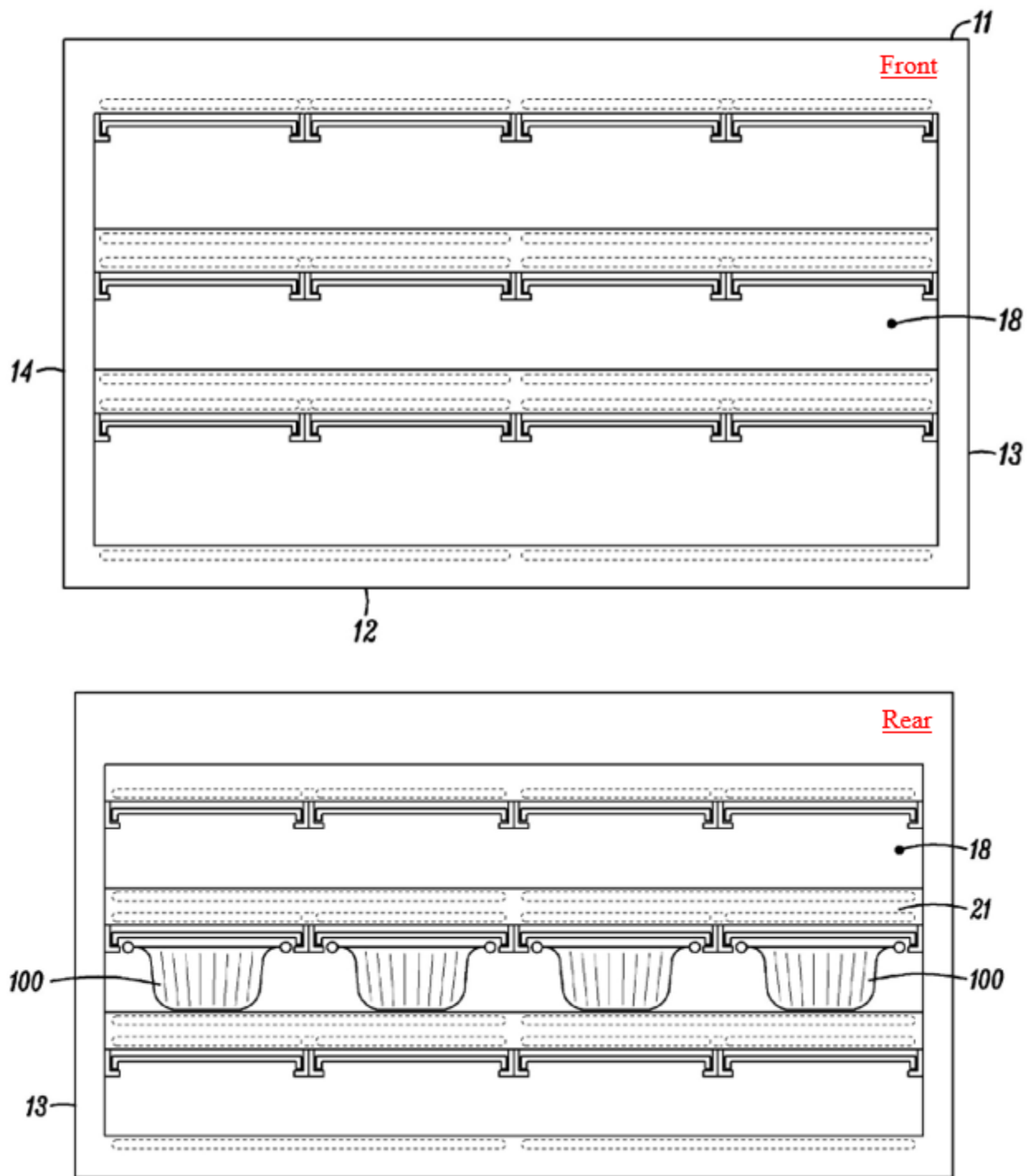
EX1005: 19.

This applies a known technique (per-bay lids and lid-holding shelves) to improve a similar device (Fortmann'748) in the same way (independent lids supported by discrete shelves secured to overhead structure) with reasonable expectation of success (purpose of lid/shelves unchanged). EX1012: ¶[0072], Fig. 1B; EX1014: 4:50-53, 7:31-32, Figs. 1-4; EX1005: 8; EX1006: 1-2; EX1007: 53, 58; EX1003: ¶¶667-668, 670-671.

Modification is represented below. EX1003: ¶672.



EX1010: Figs. 2, 6 (modified).



EX1010: Figs. 2, 6 (modified).

8. Latches

Fortmann'748's lids are removable. EX1010: ¶[0017]; EX1003: ¶673.

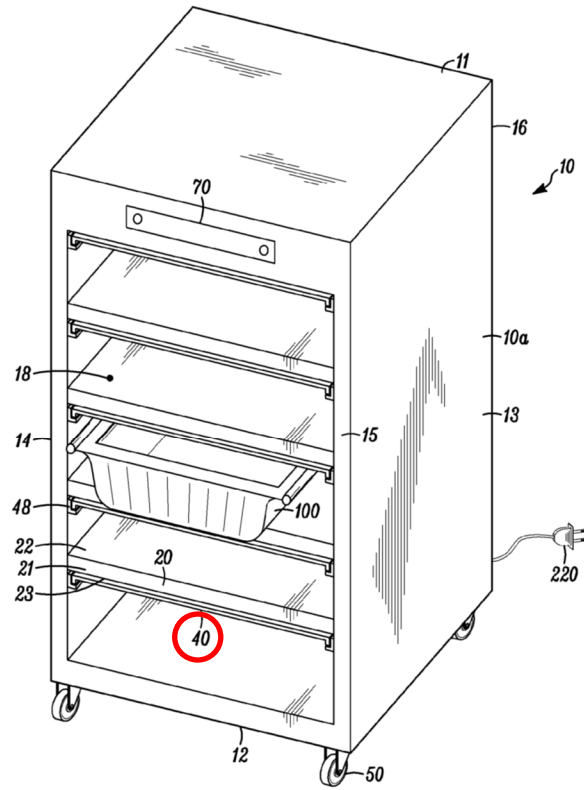
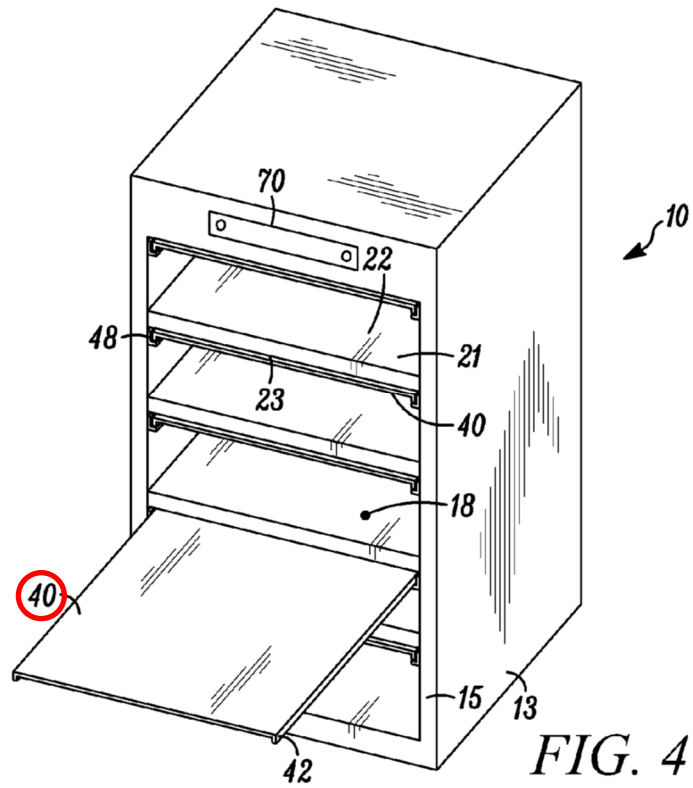


FIG. 1



EX1010.

Hartfelder's and Shei'099's stops (61)/(88) retain their lids. EX1013:

¶[0058]; EX1017: 6:9-32; EX1003: ¶¶674-676.

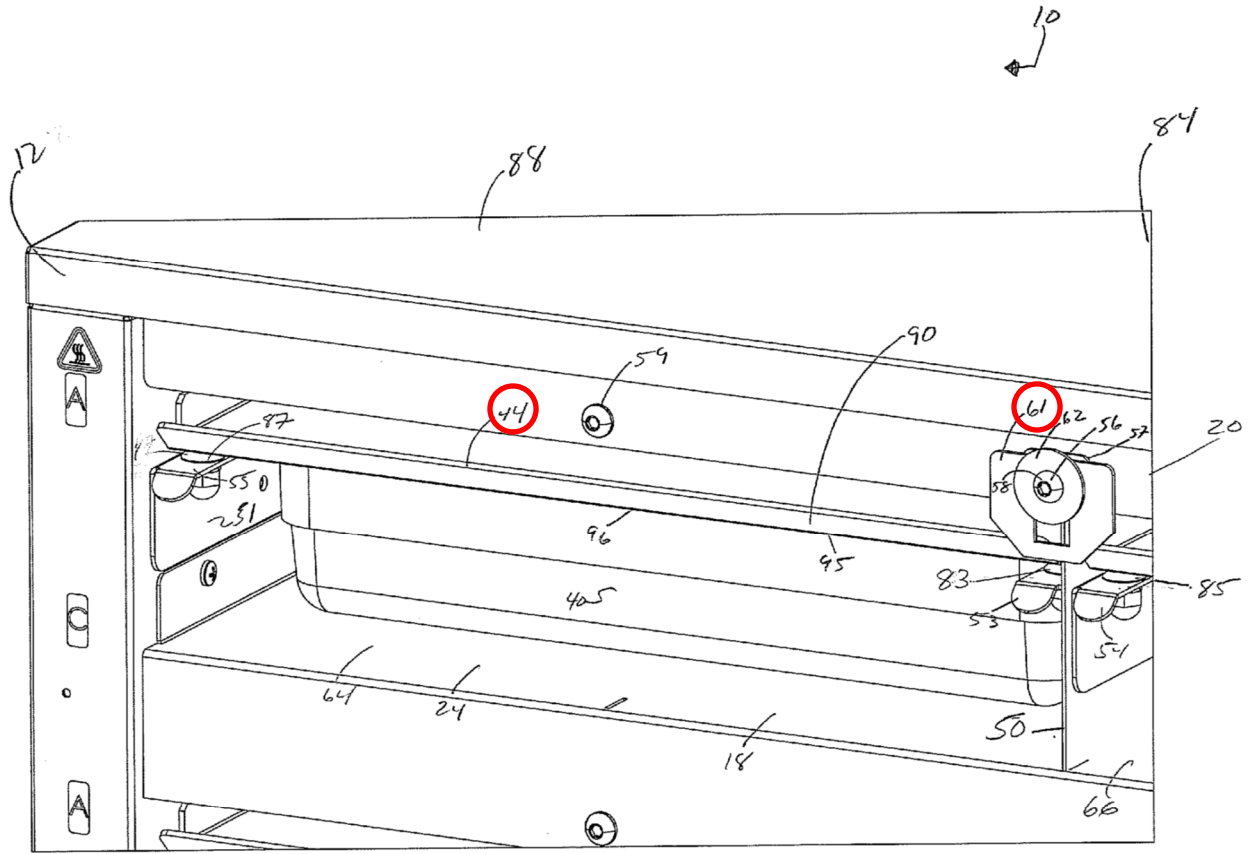
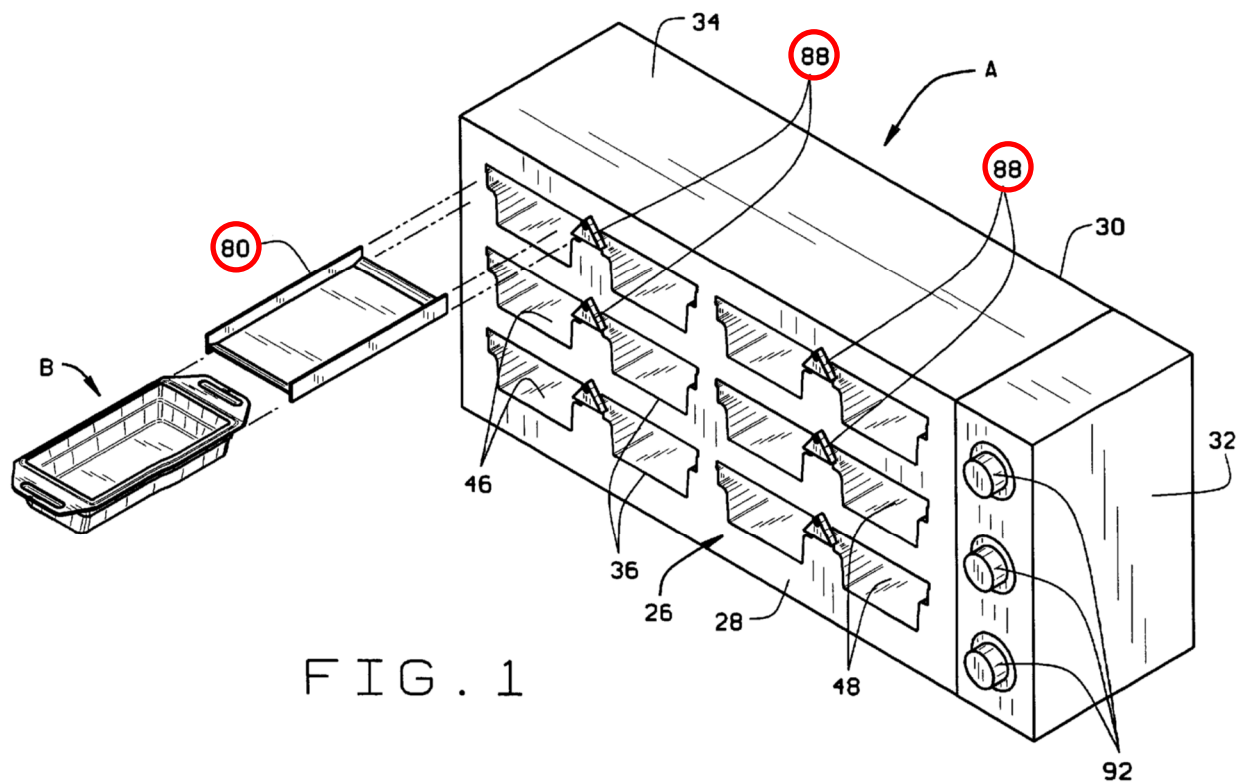


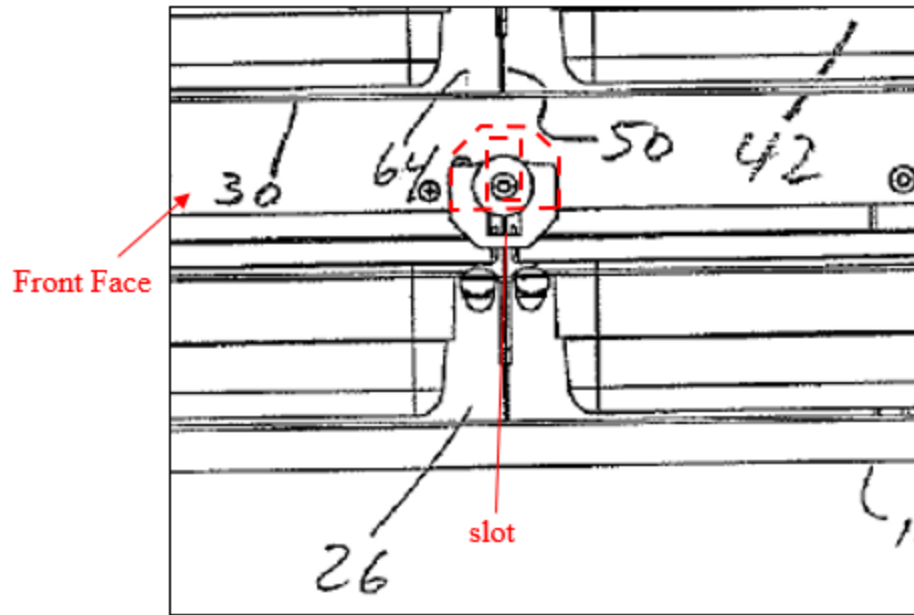
FIGURE 9

EX1013.

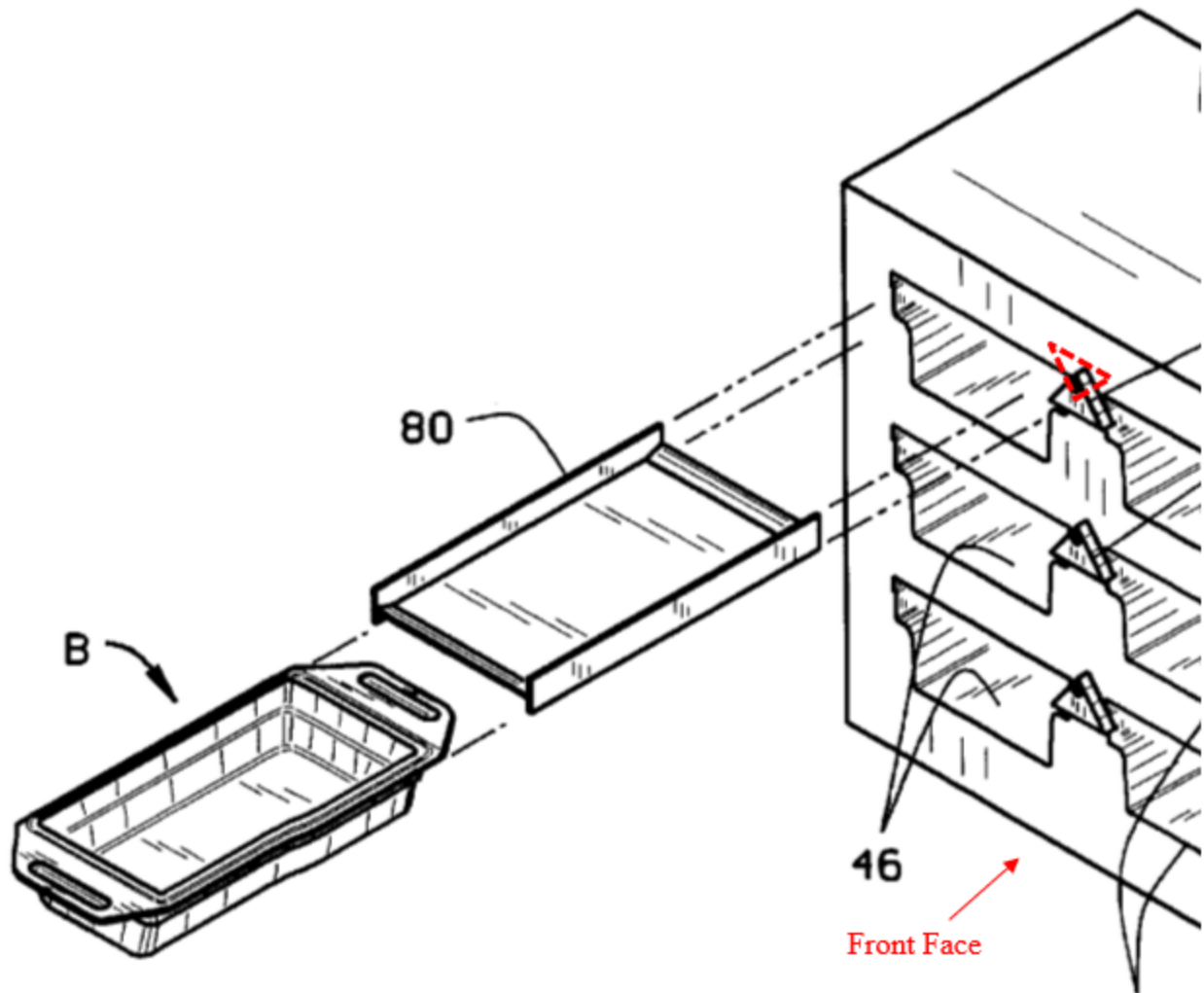


EX1017.

The stops are secured to the front face and moveable/rotatable between locked/first and unlocked/second (annotated below) positions. EX1013: Fig. 2; EX1017: 6:9-32; EX1016: ¶[0043], Fig. 1; EX1003: ¶¶856-857, 869-870, 886.



EX1013: Fig. 2 (enlarged).

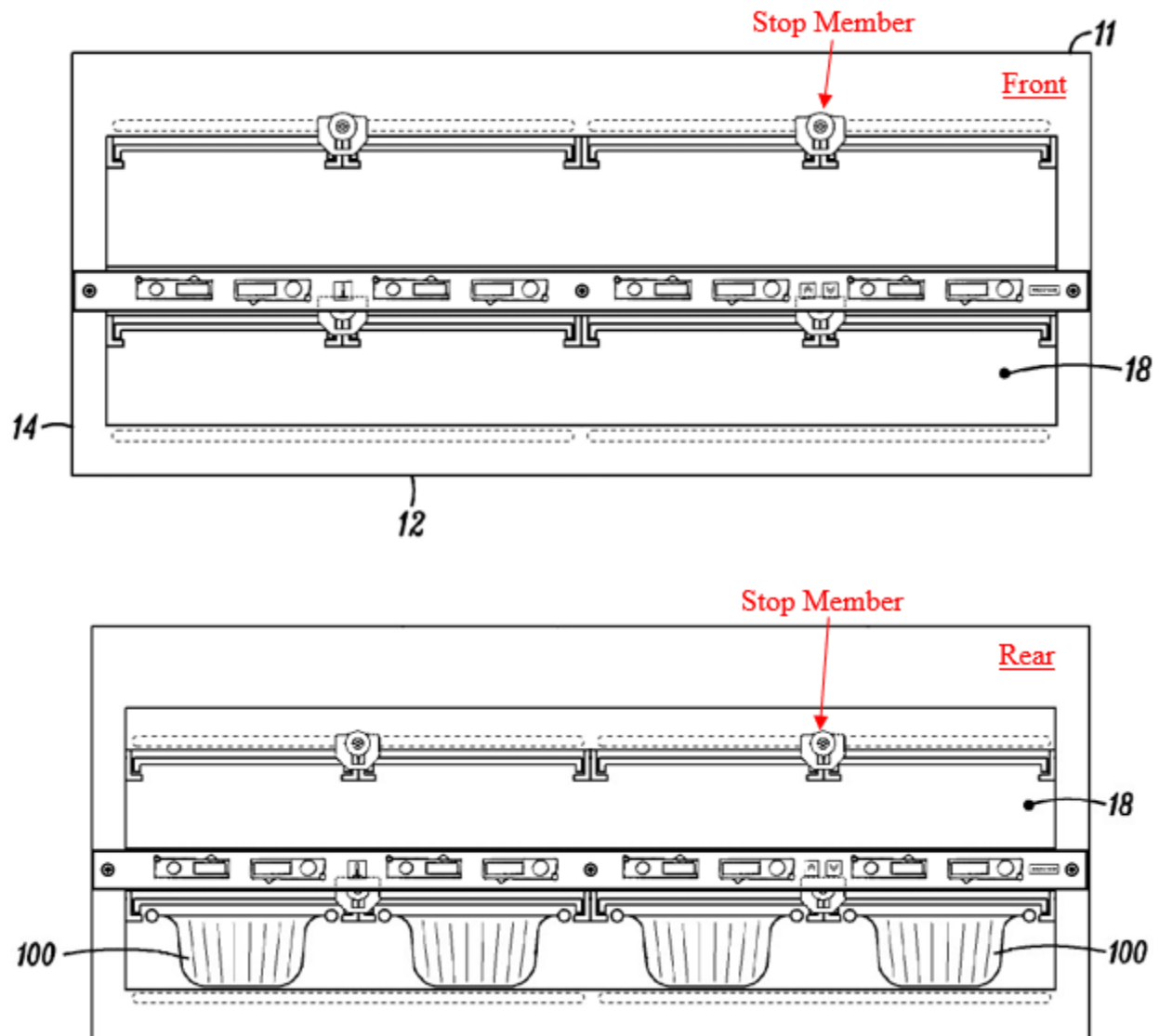


EX1017: Fig. 1 (enlarged).

It would have been obvious to modify Fortmann'748 to include Hartfelder's or Shei'099's stops/latches to block inadvertent lid removal/displacement during pan insertion and removal. EX1013: ¶[0058]; EX1017: 6:19-22; EX1003: ¶¶677-678.

Each stop would be on the chassis'/shelf's face between two lids per Hartfelder and Shei'099. EX1003: ¶681. Modified Fortmann'748 (2x4

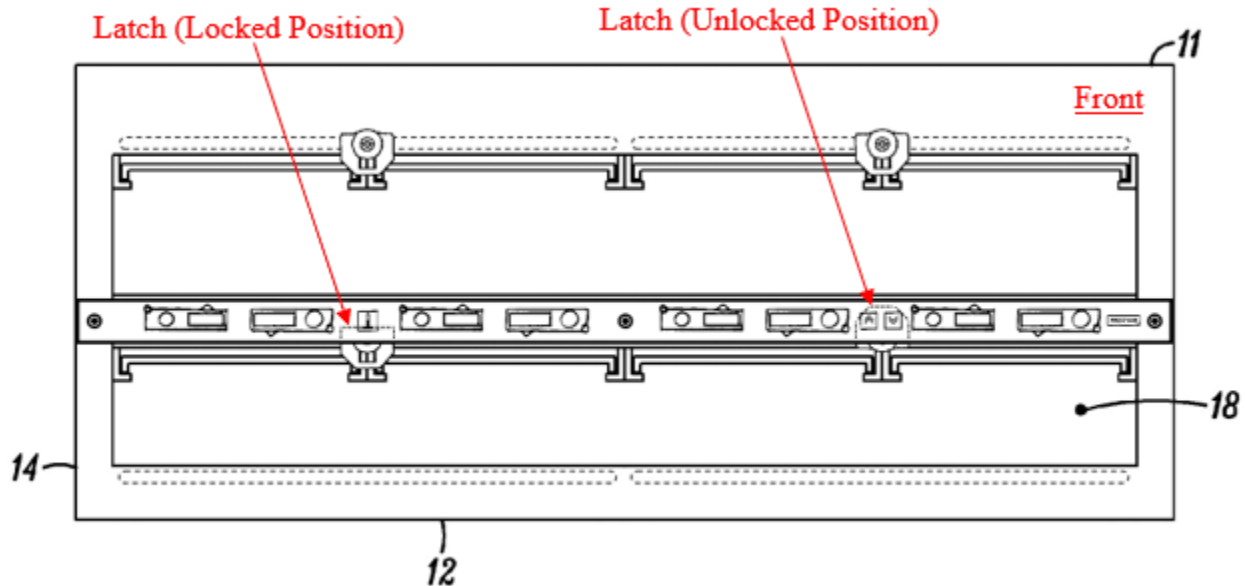
configuration) including Hartfelder's stops is represented below (Shei'099 would be similar). EX1003: ¶682.



EX1010: Figs. 2, 6 (modified).

When locked, the stop/latch would be positioned (via gravity) to block/prevent lid removal. EX1013: ¶[0058]; EX1017: 6:19-21, 29-32; EX1003: ¶¶873, 877. When unlocked, the latch would be rotated (e.g., 45-degrees or 180-

degrees) for lid removal. EX1013: Fig. 2; EX1017: 6:9-32; EX1016: ¶[0043], Fig. 1; EX1003: ¶873.



EX1010: Fig. 2 (modified).

This uses a known technique (lid retaining stops) to improve a similar device (Fortmann'748) in the same way (retaining lids while inserting/removing pans) with reasonable expectation of success (stops performing same function in same way). EX1013: ¶[0058]; EX1003: ¶¶679-680.

B. Independent Claim 1

1.P

Fortmann'748's cabinet (10) maintains multiple zones of different temperatures. EX1010: ¶¶[0002], [0014], [0024], [0027]; EX1003: ¶683.

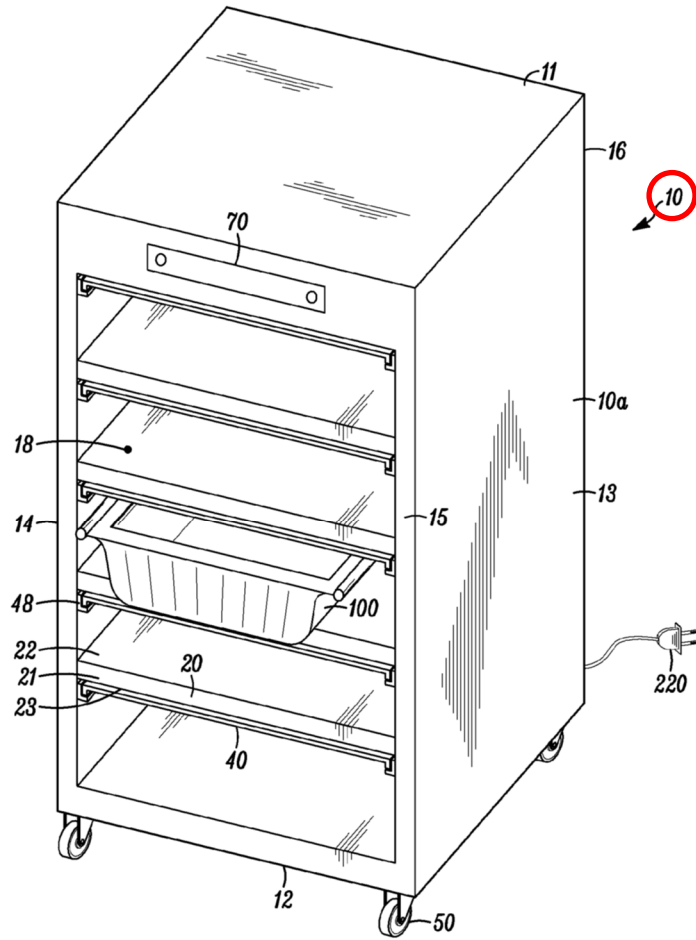


FIG. 1

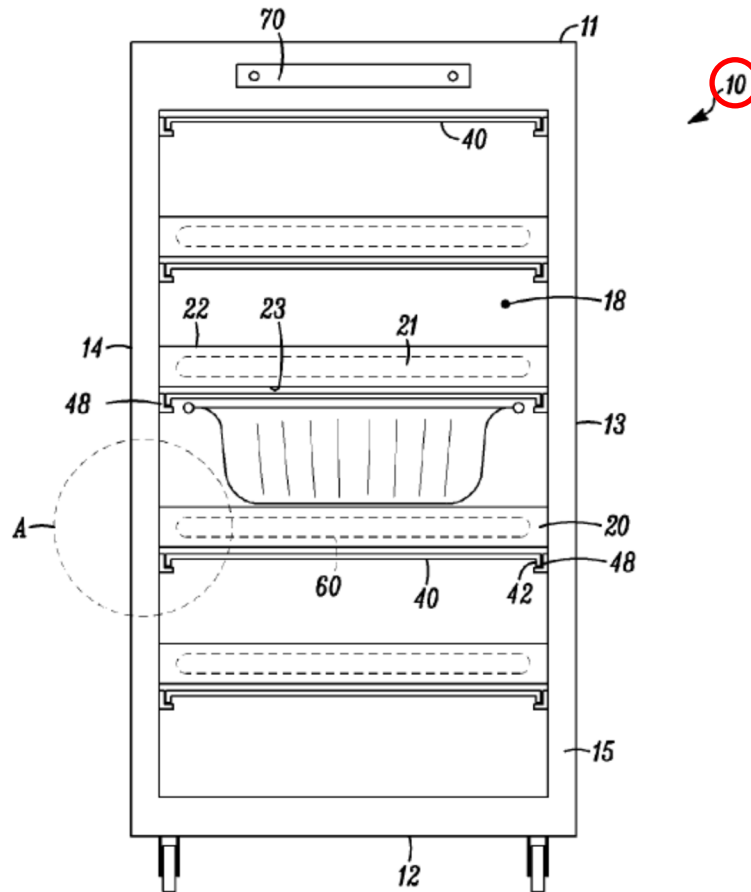
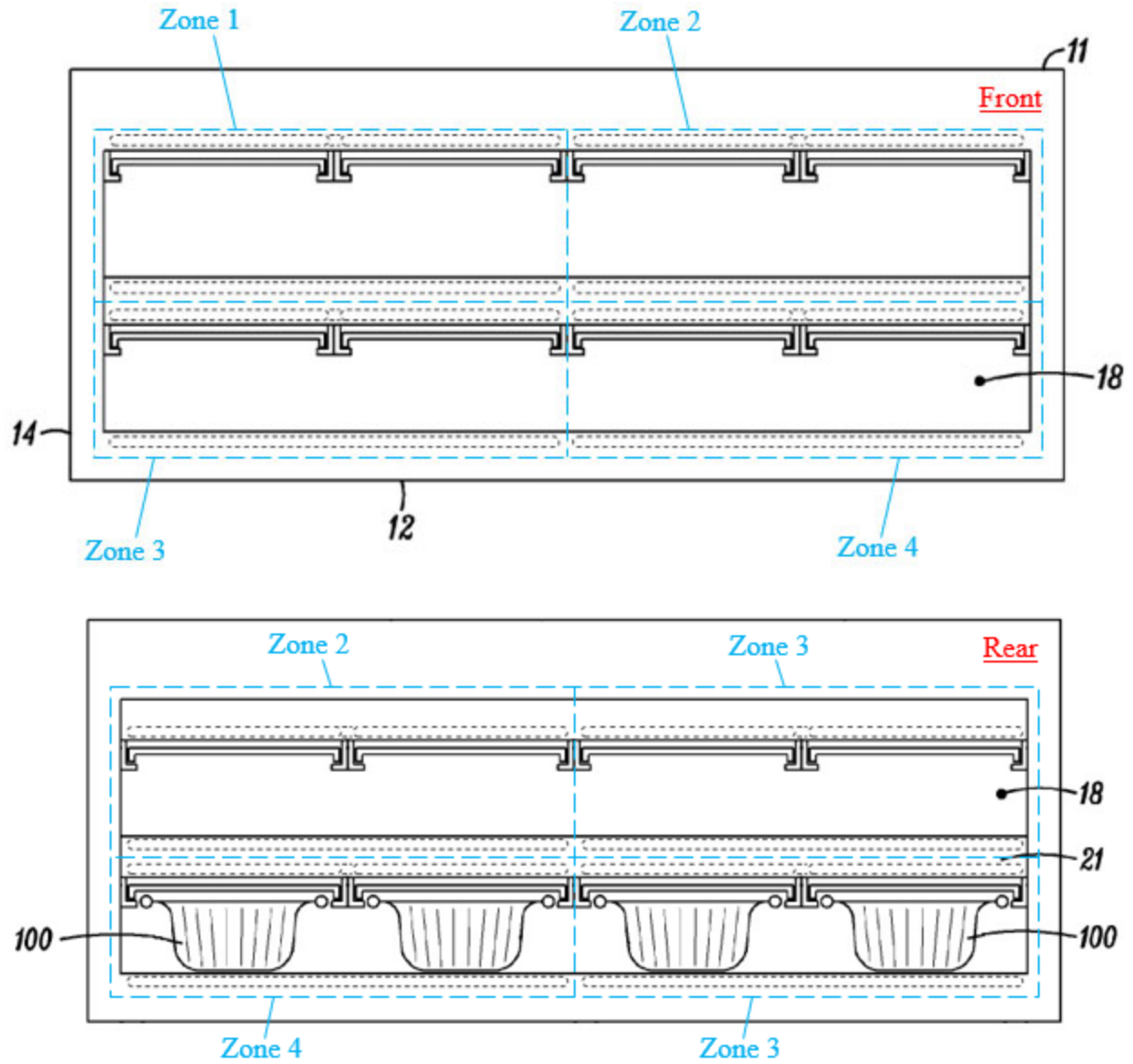


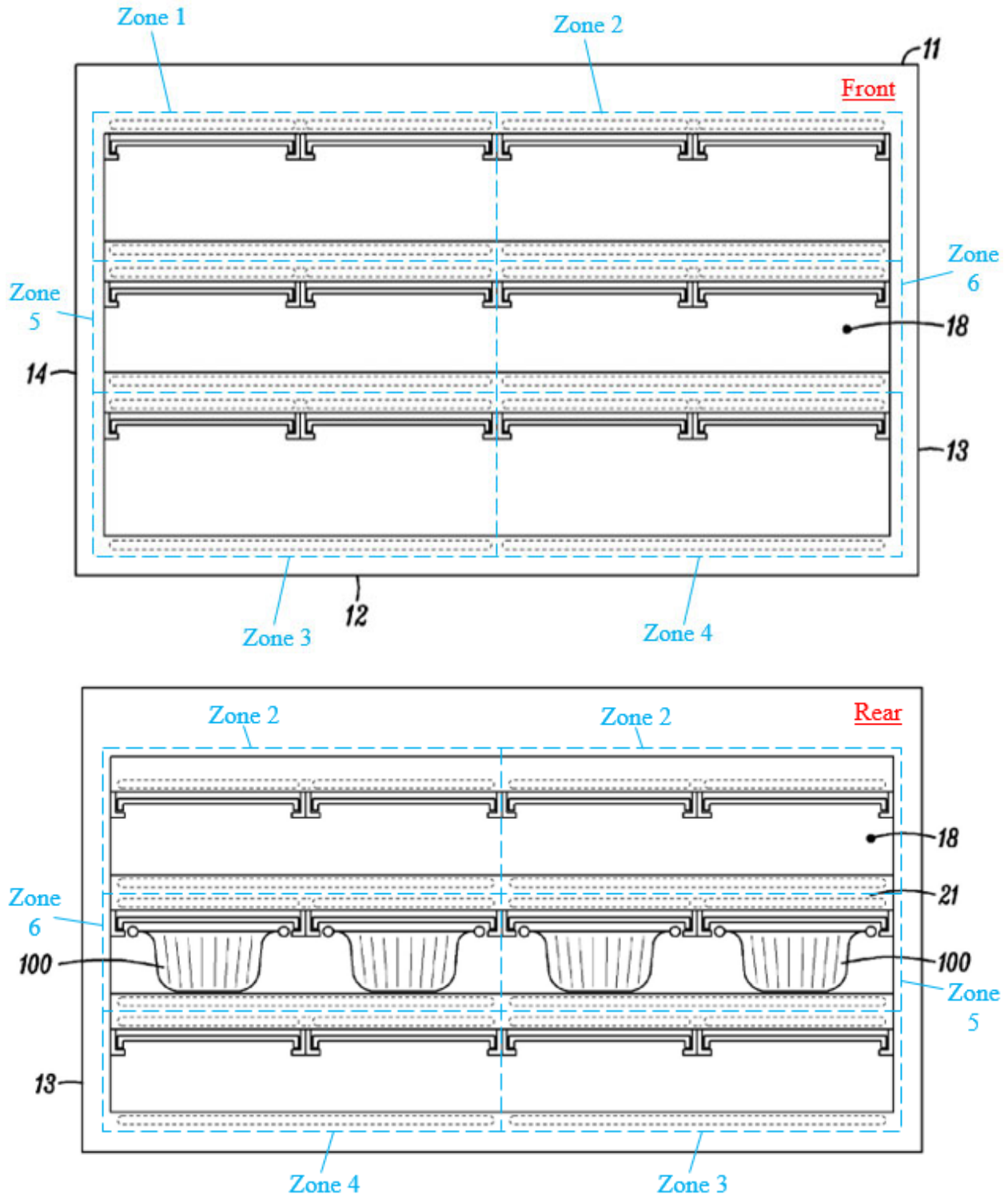
FIG. 2

EX1010.

Jones, Hartfelder, Stanger, Loy, and/or IRHS Documents disclose multiple temperature zones and Jones, IRHS Documents, McMillan, and/or Fortmann'748 disclose zones at different temperatures such that it would have been obvious to have multiple zones maintained at different temperatures. Sections XIII(A)(2), XIII(B)(1.b/1.c/1.d/1.e); EX1010: ¶¶[0024], [0027]; EX1012: ¶¶[0096], [0098], [0130]; EX1005: 4, 16, 25, 26; EX1006: 1; EX1007: 51, 53; EX1013: ¶[0037]; EX1019: 4:45-52; EX1042: ¶[0055]; EX1043: Fig. 17; EX1003: ¶684.



EX1010: Figs. 2, 6 (modified).



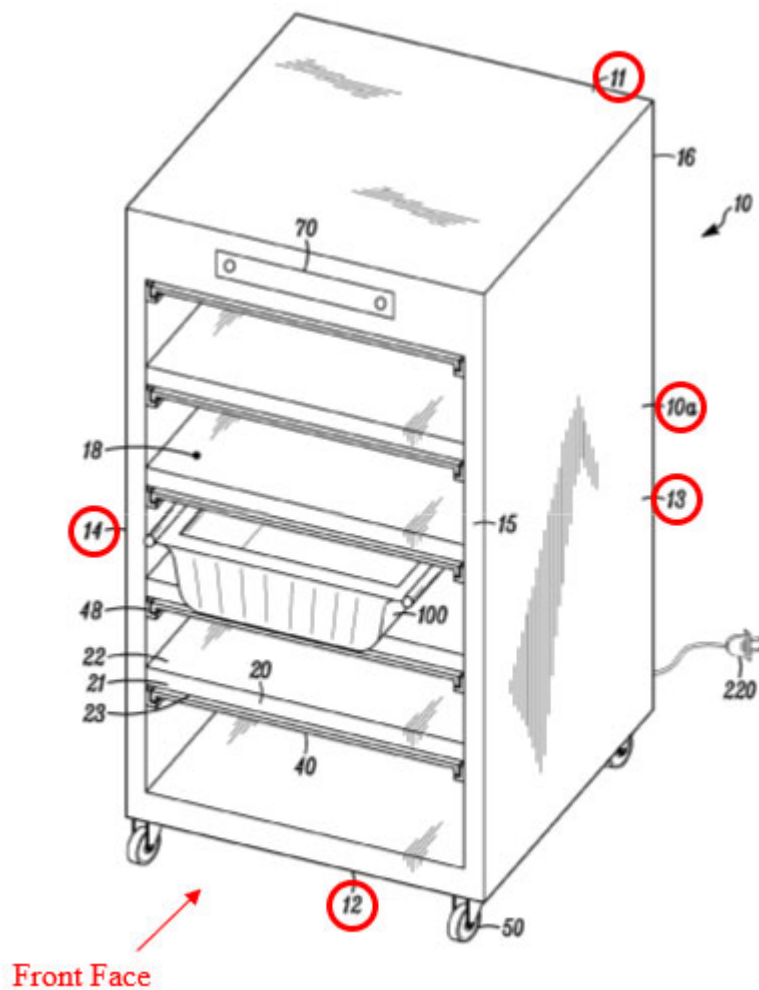
EX1010: Figs. 2, 6 (modified).

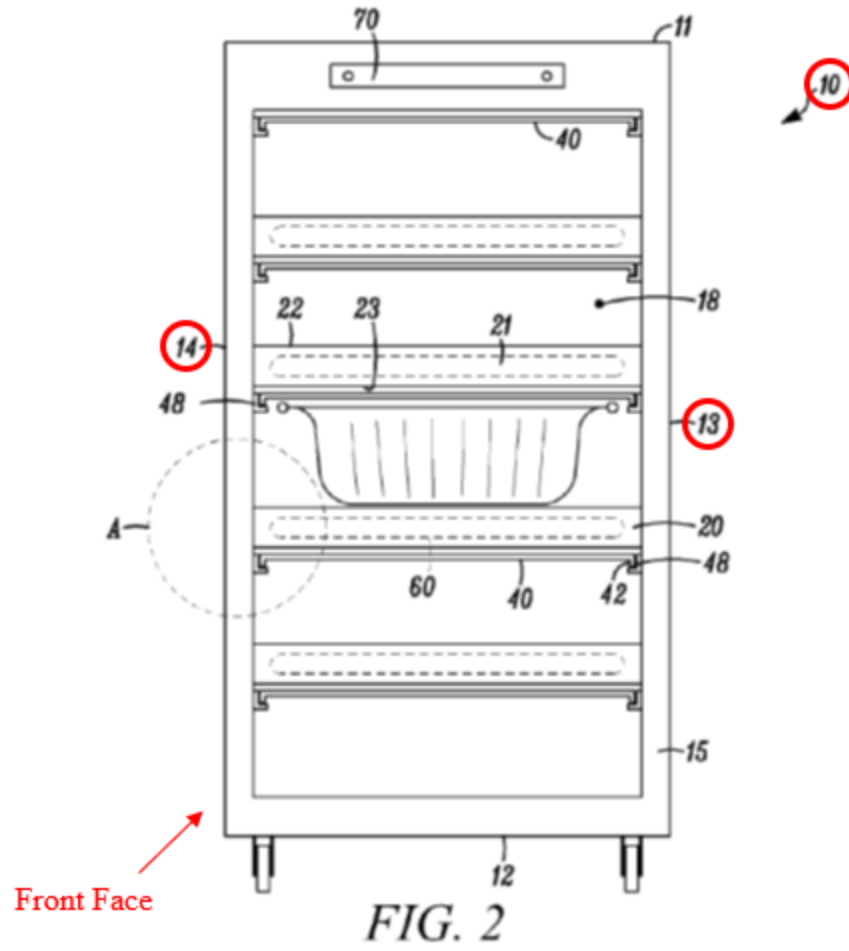
Fortmann'748's modified 2x4 configuration is applied to claims 1-2 and 5-20, and Fortmann'748's modified 3x4 configuration is applied to claims 1 and 3-4.

EX1003: ¶685.

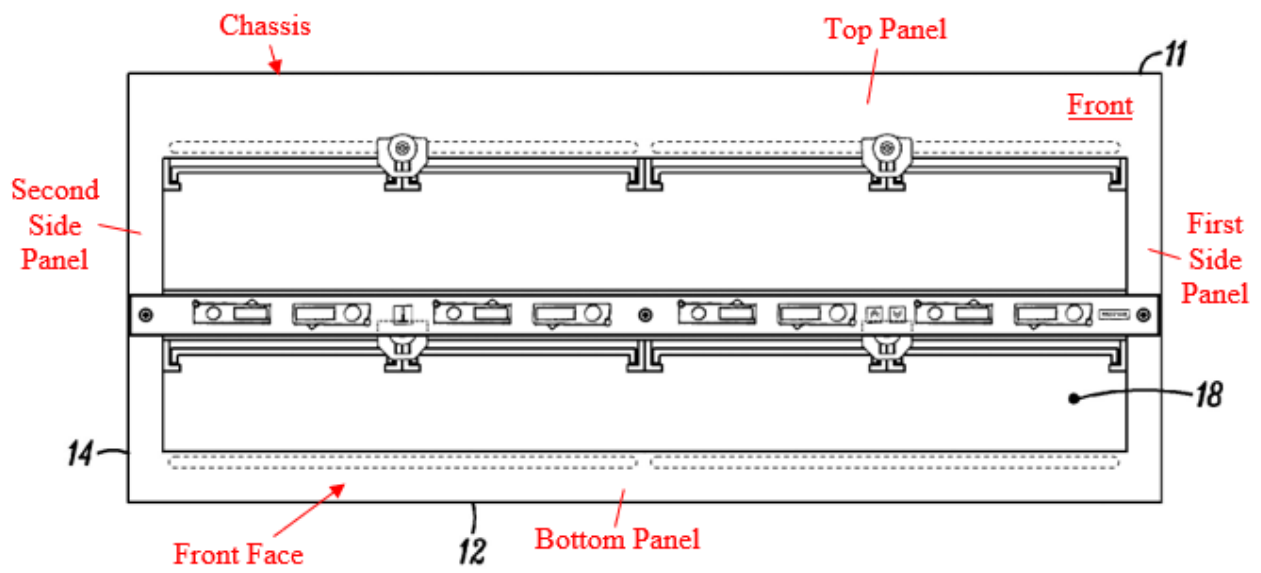
1.a.1

A chassis (10a) has top, bottom, first side, and second side panels (11-14), and a front face. EX1010: ¶¶0014]; EX1003: ¶¶686-687.

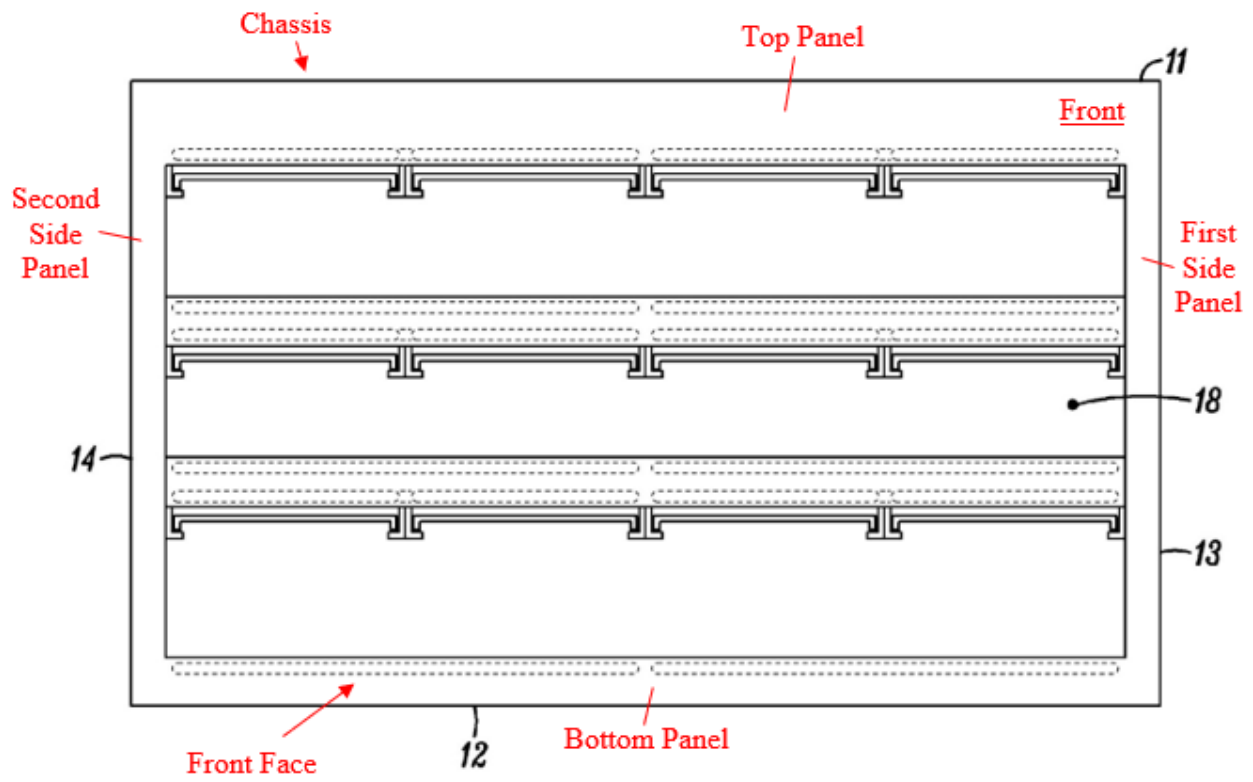




EX1010.



EX1010: Fig. 2 (modified).

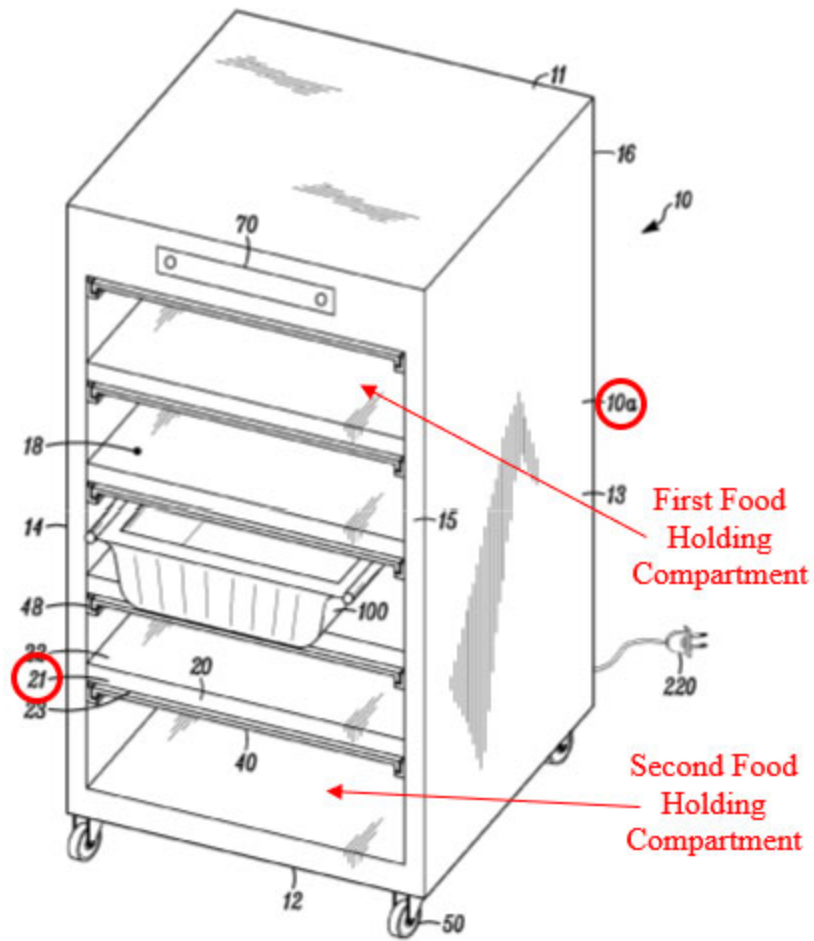


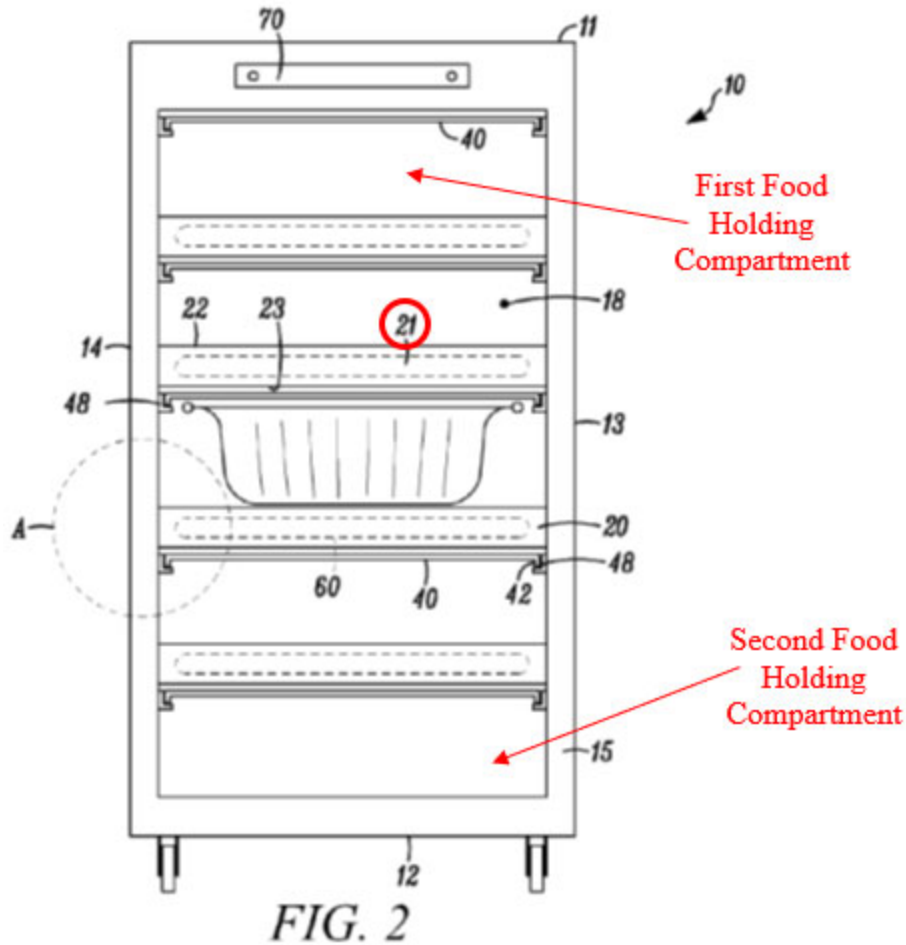
EX1010: Fig. 2 (modified).

1.a.2/1.a.5

Shelves (21) separate first and second compartments within the chassis

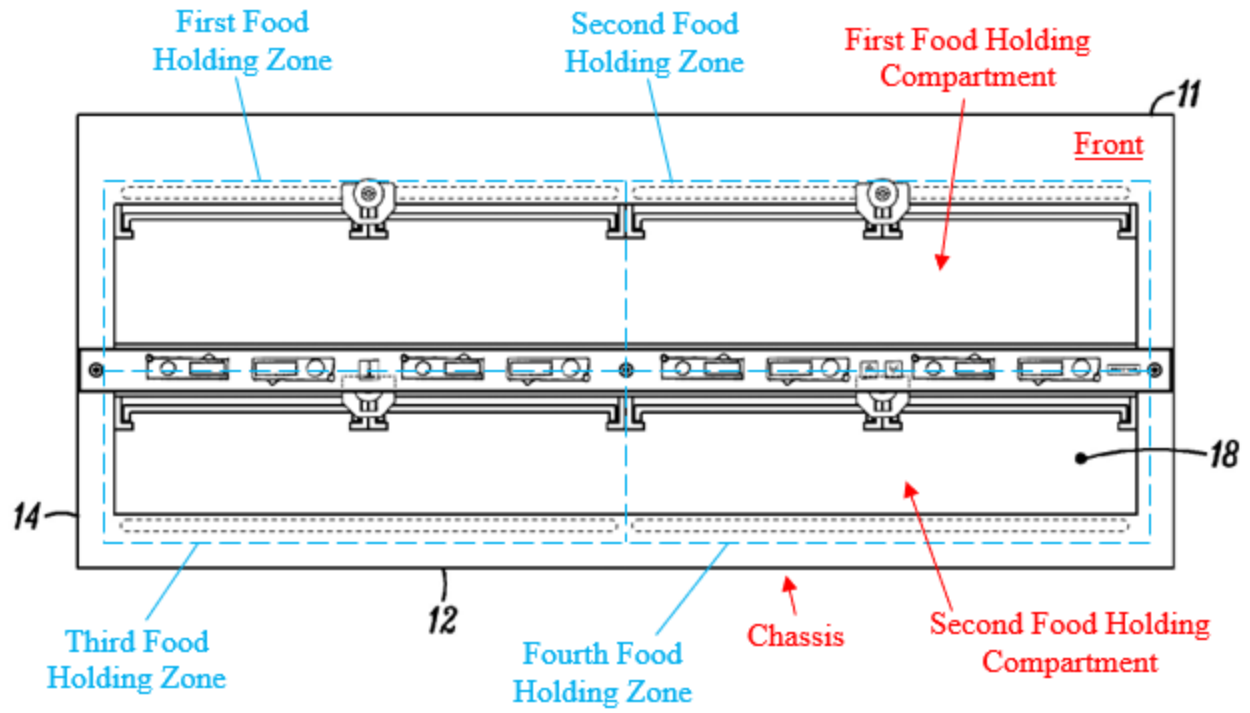
(10a). EX1010: ¶¶[0014]-[0015]; EX1003: ¶¶688-689.



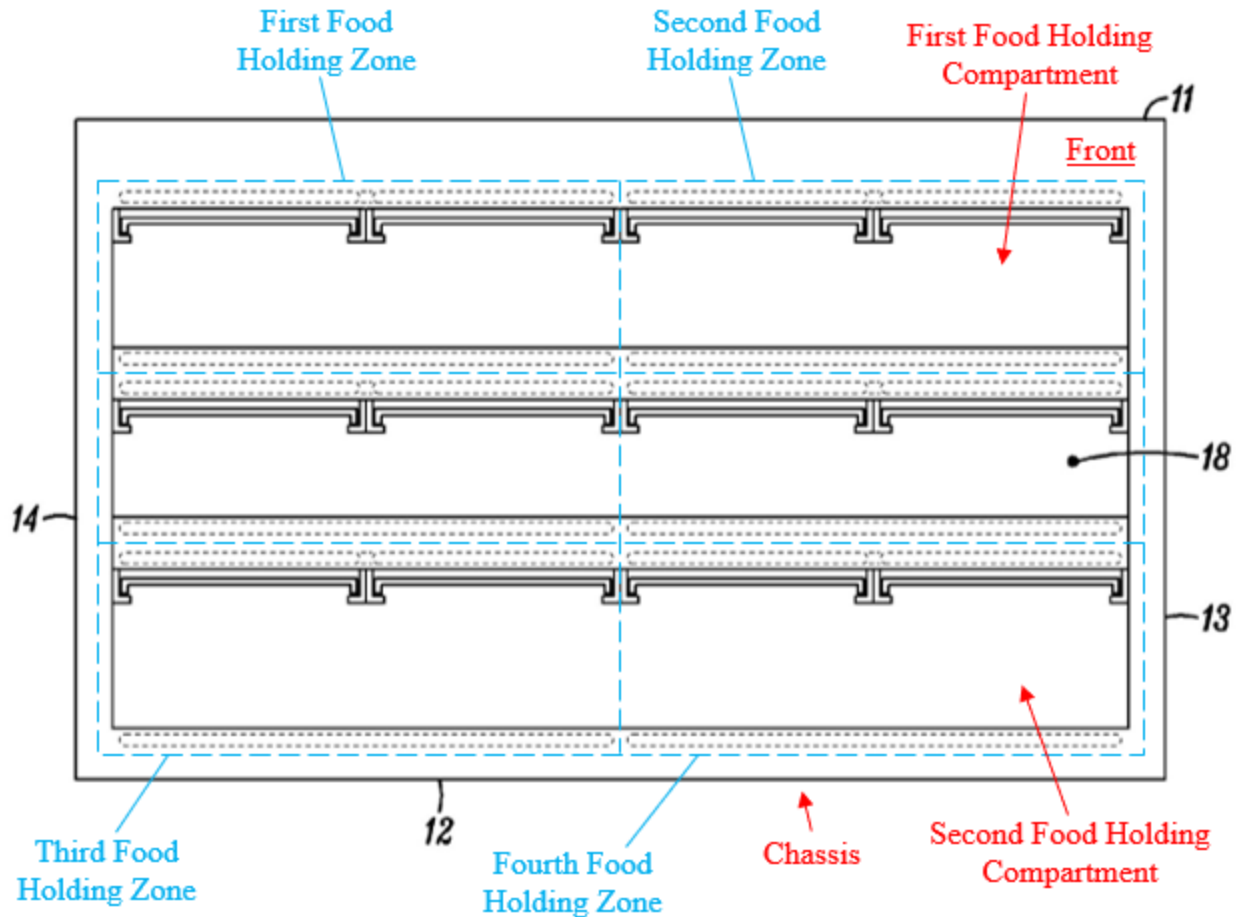


EX1010.

Jones, Hartfelder, Stanger, Loy, and/or IRHS Documents disclose multiple zones per compartment such that it would have been obvious to have first and second zones and third and fourth zones in the respective first and second compartments. Section XIII(A)(2); EX1005: 20, 25, 26; EX1007: 53; EX1012: ¶¶[0069], [0072], [0096]; EX1013: ¶[0037]; EX1042: ¶[0055]; EX1043: Fig. 17; EX1003: ¶690.



EX1010: Fig. 2 (modified).



EX1010: Fig. 2 (modified).

1.a.3/1.a.6/1.a.7

First and second side panels (13/14), the top panel (11) (first top surface), and first planar bottom surface (unobstructed between side panels) define the first compartment. EX1003: ¶¶691-692. The side panels, second top surface, and the bottom panel (12) (second planar bottom surface unobstructed between side panels) define the second compartment. EX1010: ¶¶[0015], [0019]; EX1003: ¶¶701-702, 712-714.

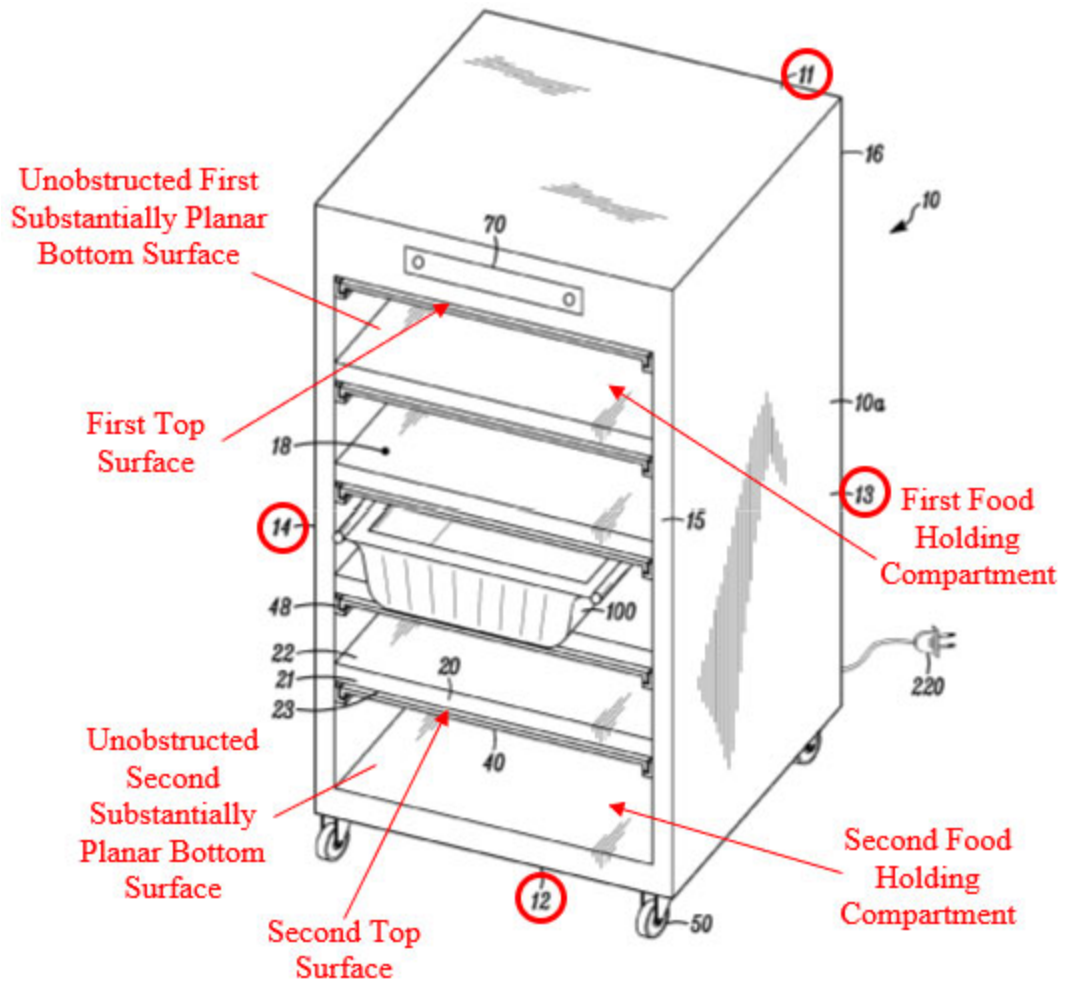
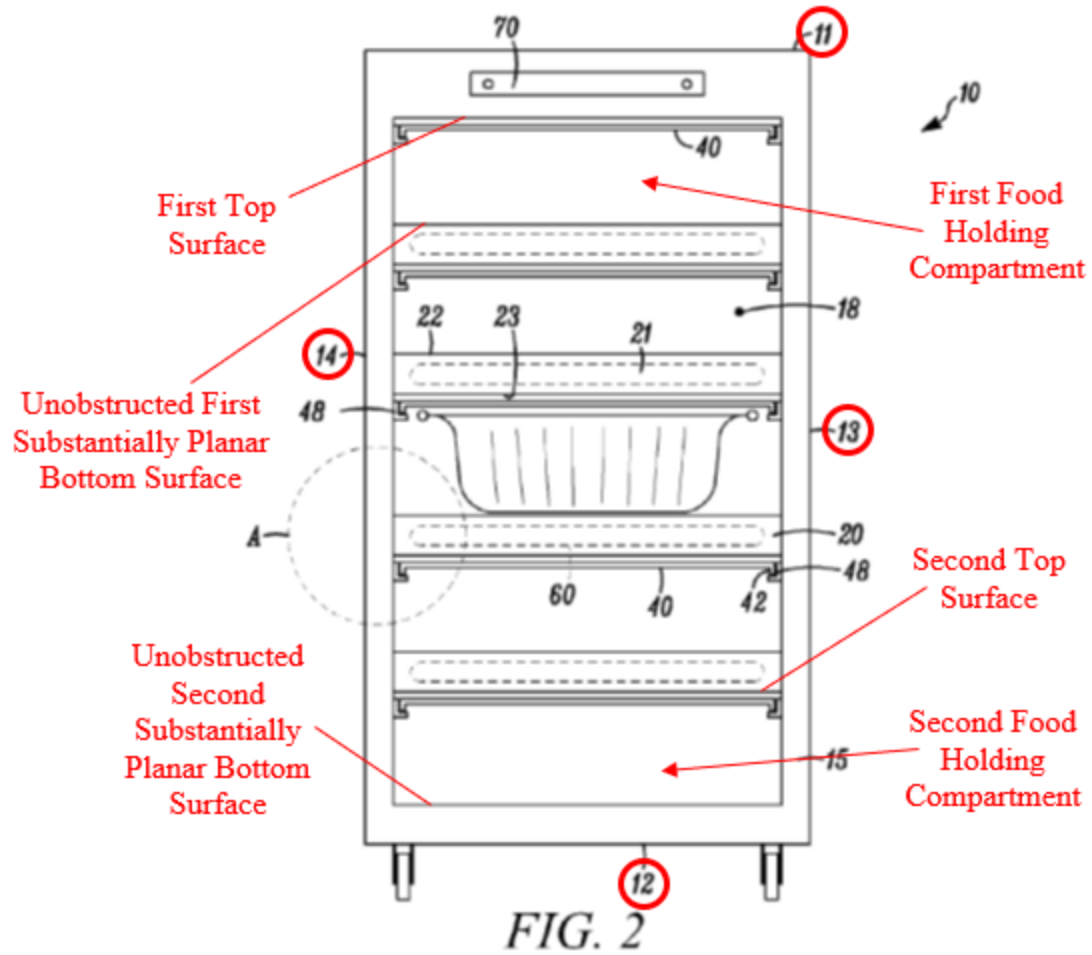
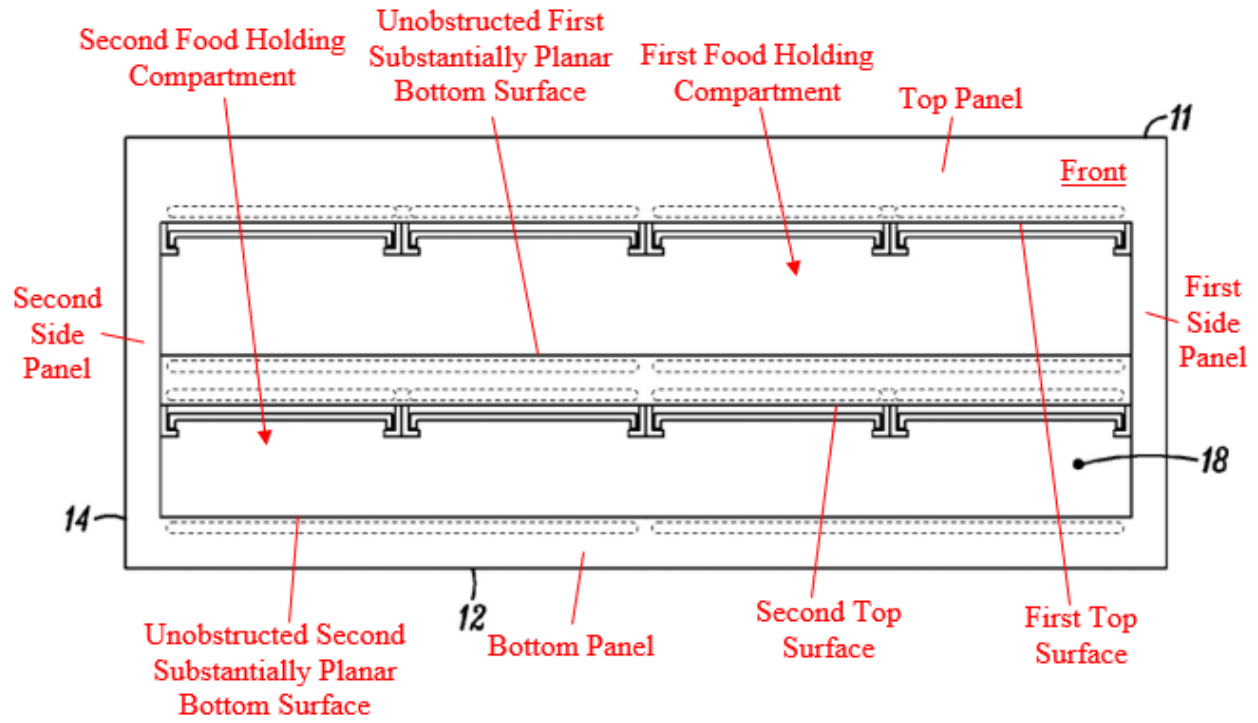


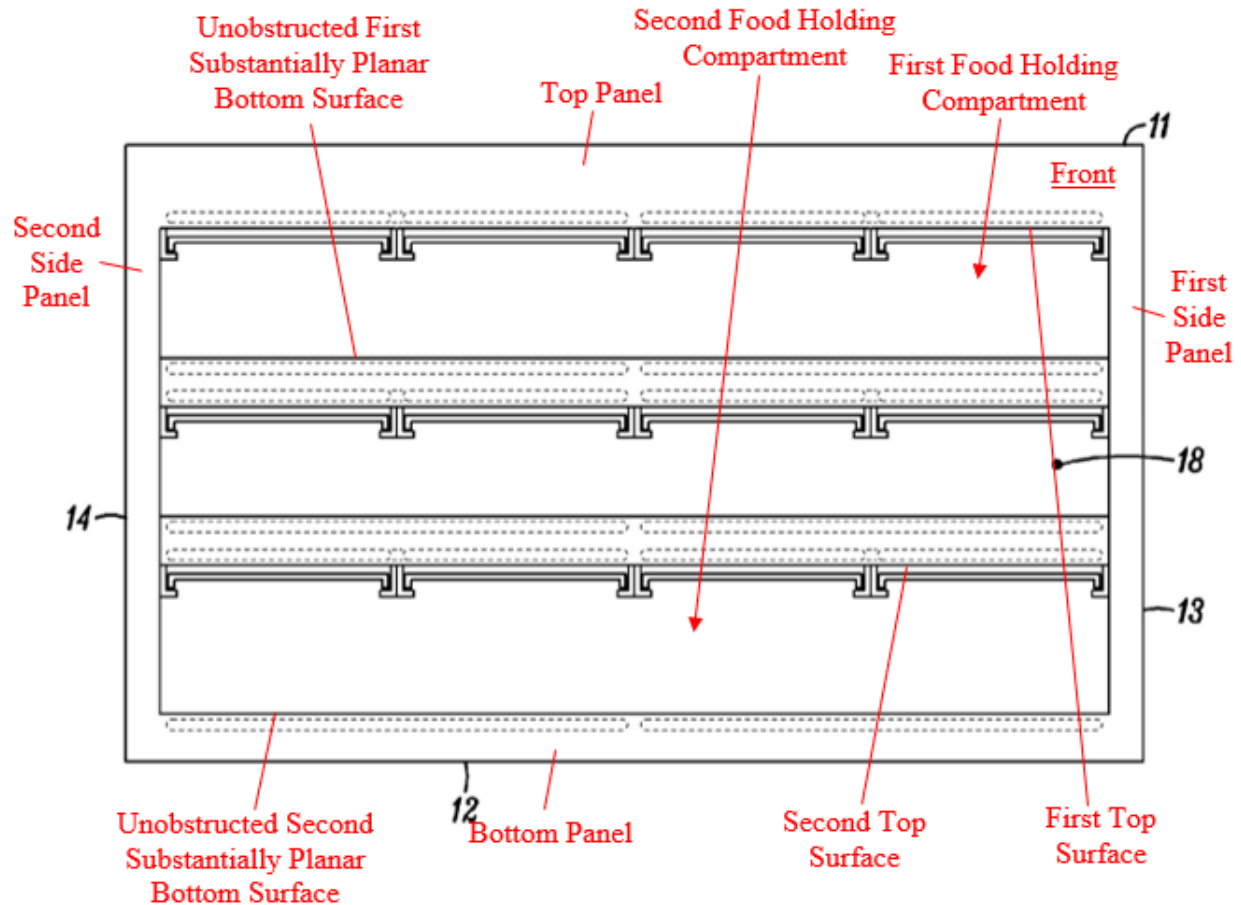
FIG. 1



EX1010.



EX1010: Fig. 2 (modified).



EX1010: Fig. 2 (modified).

The first planar surface is thermally conductive stainless steel. EX1010: ¶[0019]; EX1003: ¶¶693-694.

The bottom panel is considered a shelf, with its top/second planar surface being thermally conductive stainless steel. EX1010: ¶¶[0016]-[0017], [0019]; EX1003: ¶¶703-706.

Moreover, it would have been obvious to make Fortmann'748's bottom panel/second planar surface of thermally conductive stainless steel, a suitable material for constructing cabinets and supporting trays. EX1010: ¶[0019];

EX1003: ¶707. This is a mere design choice. *In re Leshin*, 277 F.2d 197, 199 (CCPA 1960) (“selection of known plastics ..., would be entirely obvious”); *Ex parte Gehring*, Appeal No. 2014-004556 at 6 (P.T.A.B. June 14, 2016) (suitable material selection obvious design choice); EX1003: ¶708.

This combines known elements (stainless steel, Fortmann’748’s bottom panel) according to known methods (Fortmann’748’s construction) and/or a simple substitution of one known alternative (stainless steel) for another (Fortmann’748’s bottom panel material) to yield predictable results (thermally conductive bottom panel supporting pans/trays) with reasonable expectation of success (Fortmann’748 uses stainless steel). EX1010: ¶[0019]; EX1003: ¶¶709-710.

1.a.4/1.a.8

First and second openings through the front face allow pan/tray (100) passage into the first and second compartments, onto the planar surfaces. EX1010: ¶¶[0014]-[0015]; ¶[0017]; EX1003: ¶¶695-697, 713-715.

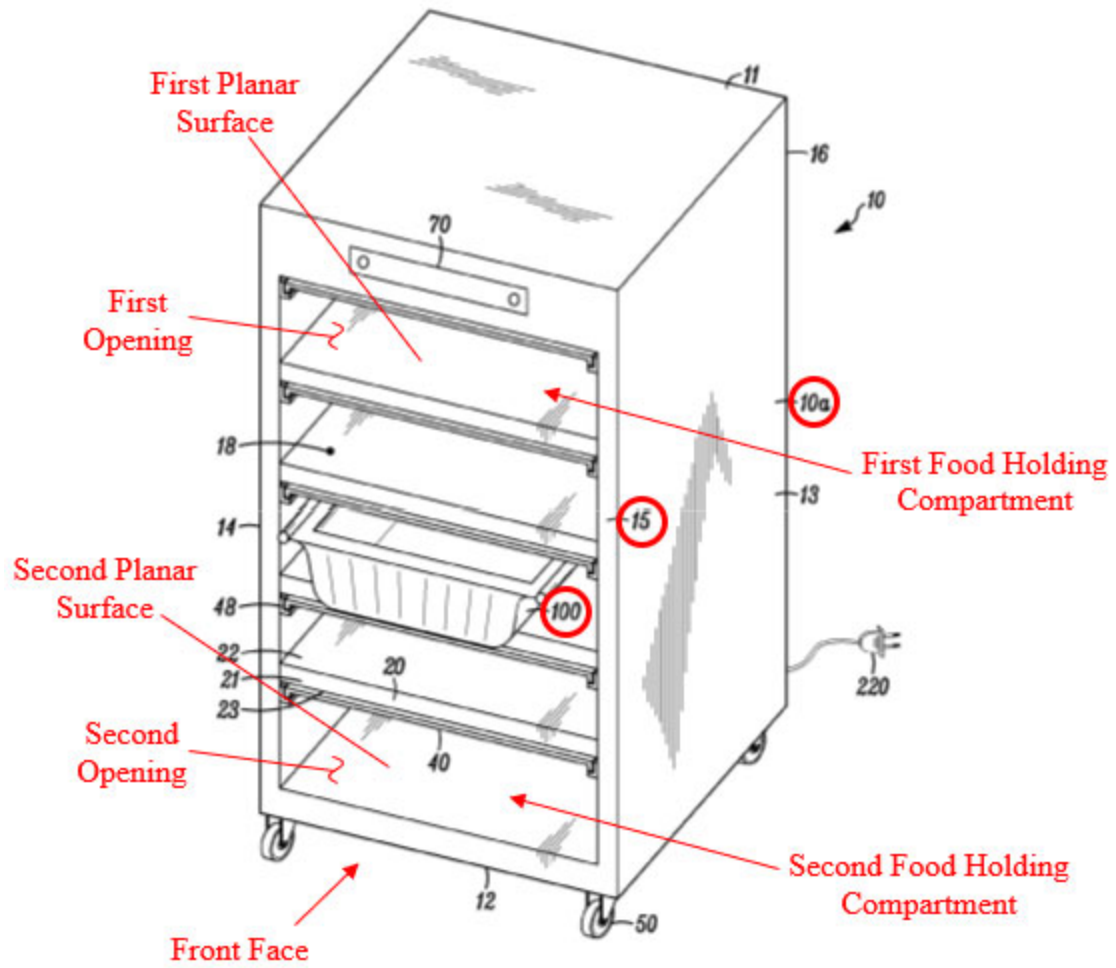
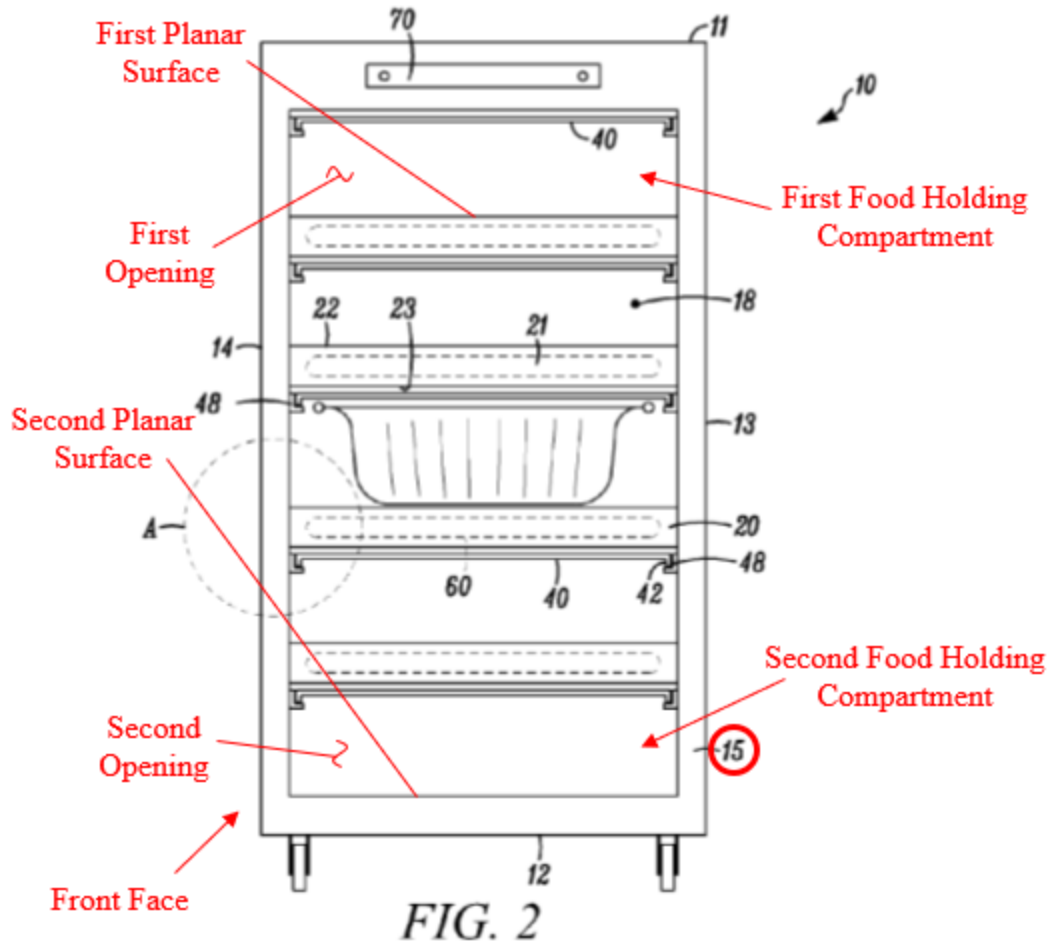
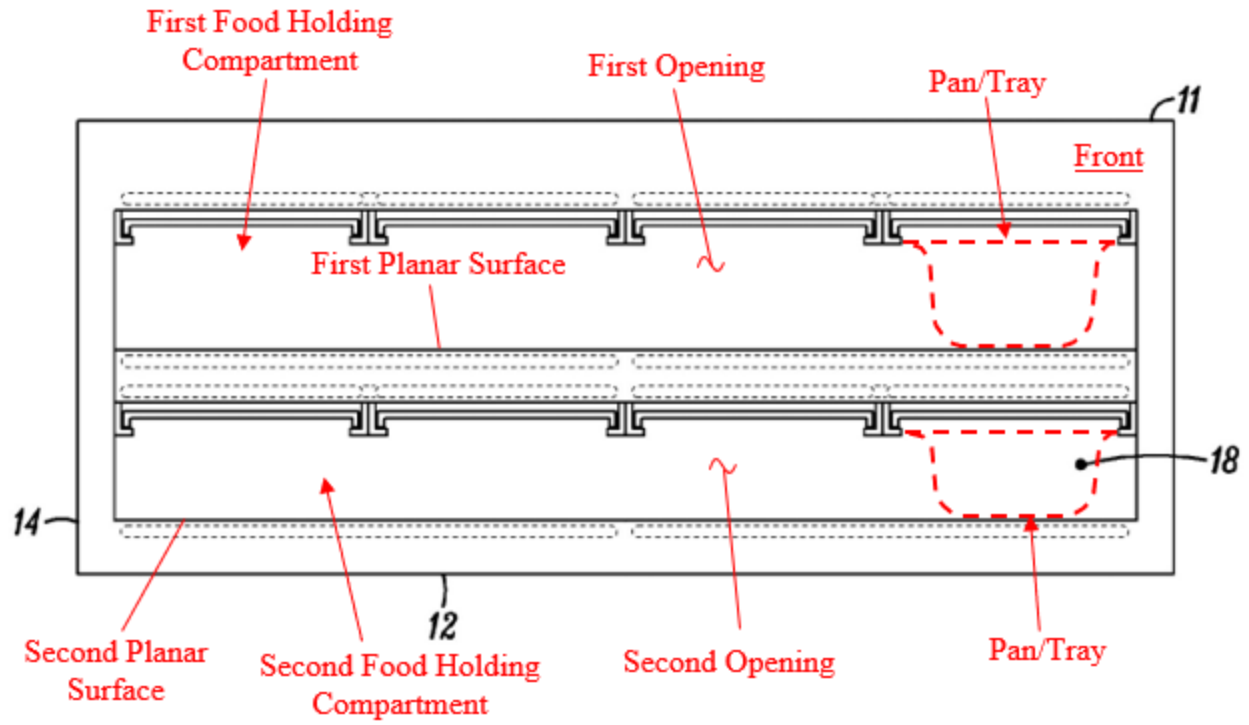


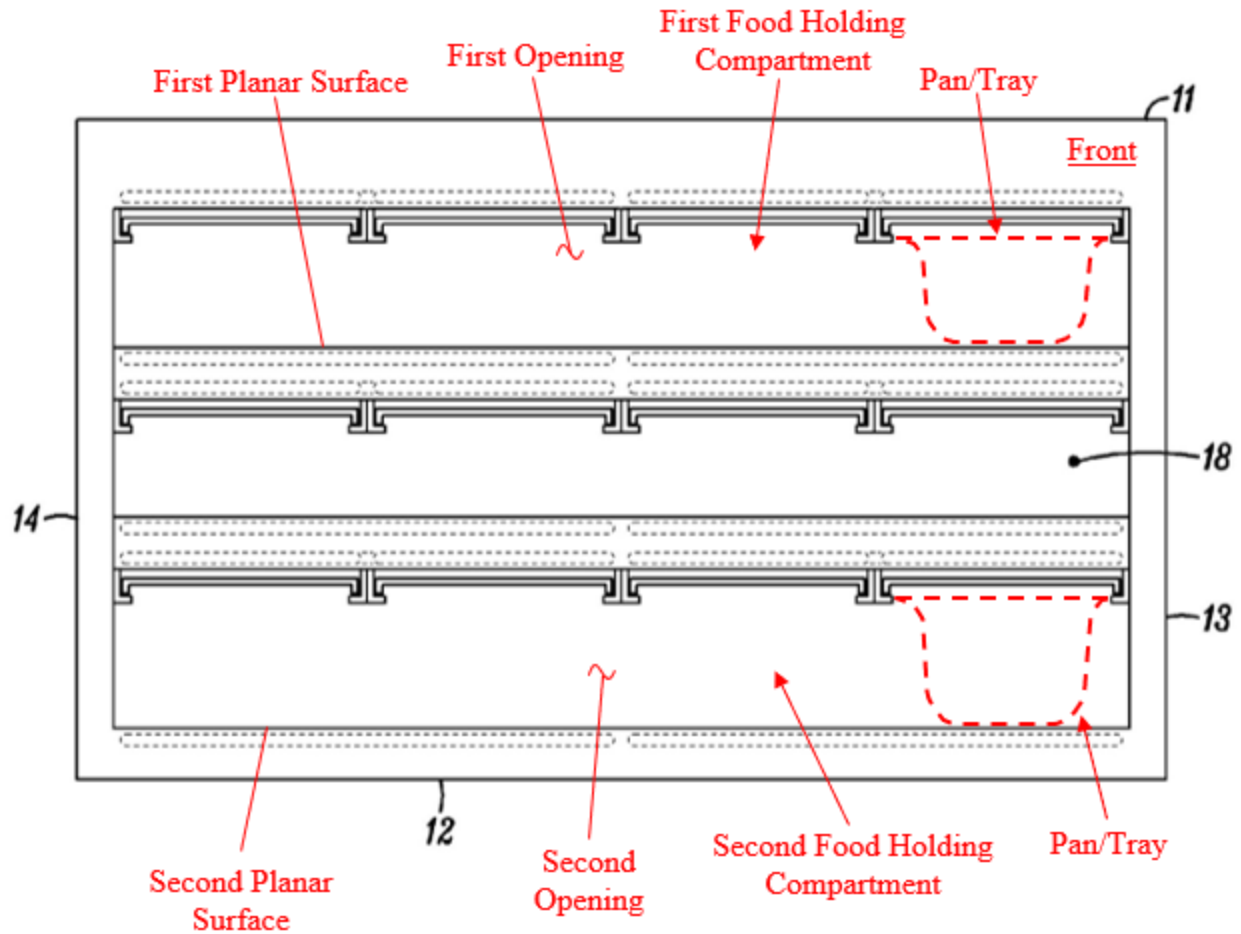
FIG. 1



EX1010.



EX1010: Fig. 2 (modified).

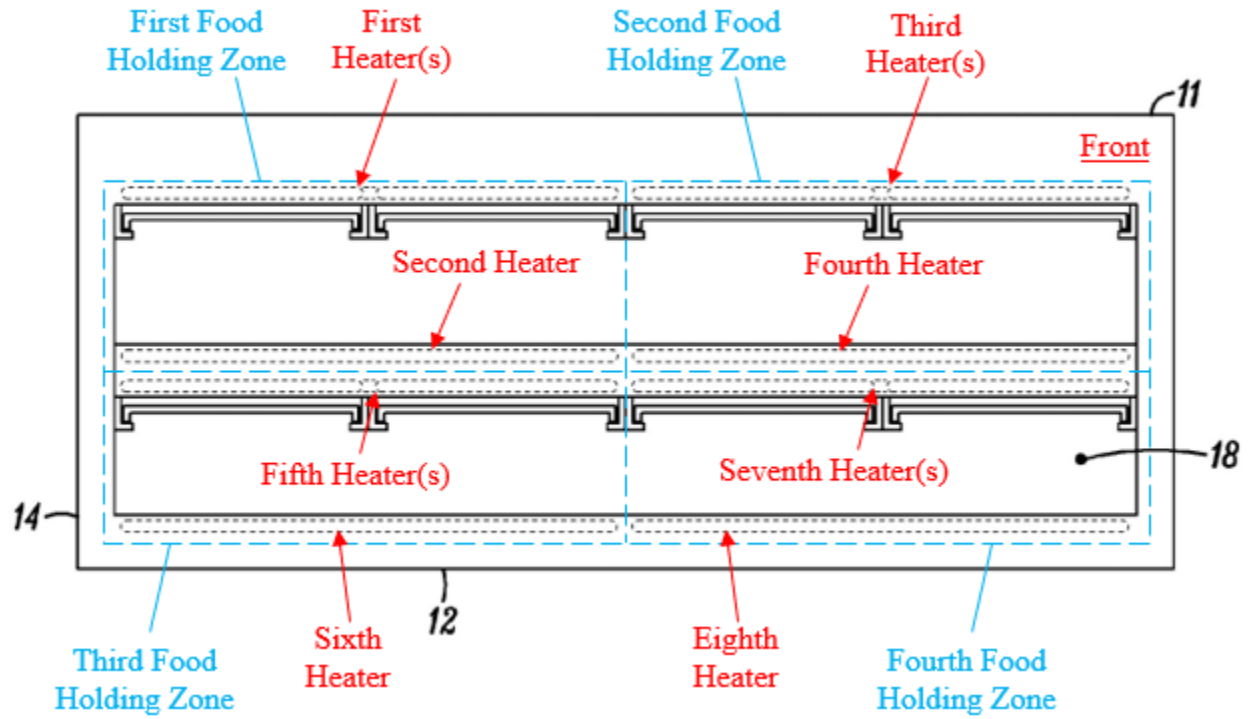


EX1010: Fig. 2 (modified).

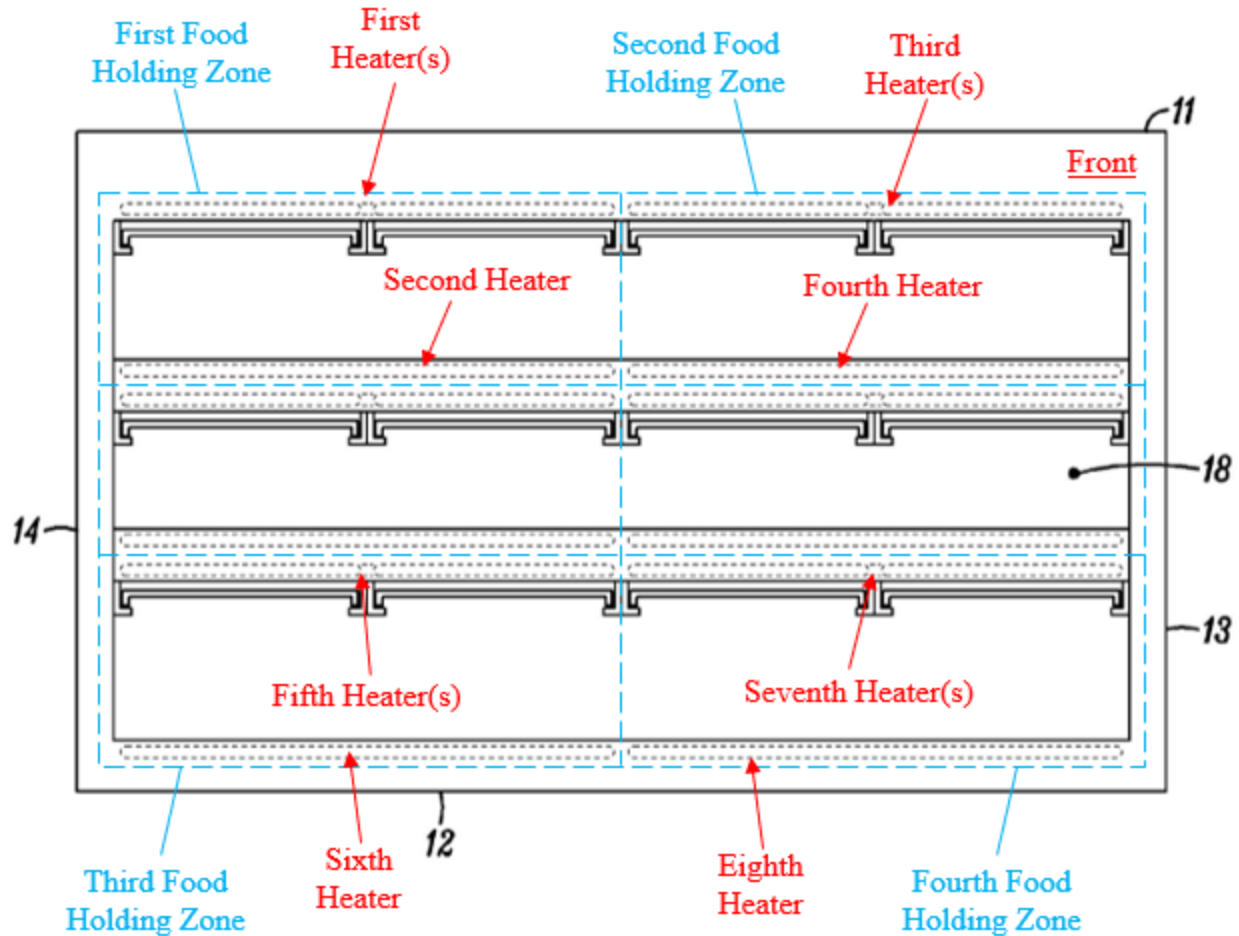
1.b/1.c/1.d/1.e

Jones, Hartfelder, and/or IRHS Documents disclose upper and lower heaters for each zone and Jones, Fortmann'197, IRHS Documents, and McMillan disclose independently controllable heaters such that it would have been obvious for each zone to have upper (e.g., first, third, fifth, seventh) and lower (e.g., second, fourth, sixth, eighth) heaters (heating elements) independently controllable via Fortmann'748's controller. Sections XIII(A)(2)-(3)); EX1010: ¶[0027]; EX1005: 16, 20, 25, 26; EX1006: 1; EX1007: 53; EX1012: ¶¶[0072]-[0073], [0096], [0098],

[0130]; EX1013: ¶[0037]; EX1014: 3:6-27, 8:63-9:19, 9:50-65; EX1019: 4:36-59;
EX1003: ¶¶716-720, 731, 736, 743.



EX1010: Fig. 2 (modified).



EX1010: Fig. 2 (modified).

Fortmann'748 teaches each zone having its own temperature setpoint selected via "an input device," with the controller operating the heaters to "achieve the desired temperature." EX1010: ¶[0027]; EX1003: ¶721.

Jones and IRHS Documents teach customized temperature settings for each food type and different food types (thus different temperatures) in each zone.

EX1012: ¶[0098], Fig. 19; EX1005: 4, 16, 25; EX1006: 1; EX1007: 28, 51, 53;

EX1003: ¶¶722-723.



EX1007: 12.

McMillan and Fortmann'748 teach heating zones to different temperatures.

EX1010: ¶[0024]; EX1019: 4:45-52; EX1003: ¶¶722-723.

Per Jones, Fortmann'748, IRHS Documents, and/or McMillan, it would have been obvious to heat zones to different temperature setpoints by independently operating the heaters to accommodate customized heat settings for different food types in each zone and to increase holding capacity for different food types to meet customer demands. EX1028: 30, 14, 39; EX1019: 1:17-45; EX1010: ¶¶[0024], [0027]; EX1006: 1; EX1003: ¶¶724, 732, 737, 744.

This uses a known technique (different zone temperatures) to improve a similar device (Fortmann'748) in the same way (independently heating compartment zones to different temperatures) with reasonable expectation of success (zone-capable control system, independently controllable heaters).

EX1010: ¶[0027]; Section XIII(A)(2)-(3); EX1003: ¶¶725-726.

Thus, it would have been obvious for Fortmann'748's controller to operate each zone (e.g., first/second/third/fourth and additional) to a temperature setpoint (e.g., first/second/third/fourth)—based on the specific food type temperature settings assigned to the respective zone—by independently operating the upper heater(s) (e.g., first/third/fifth/seventh) and independently operating the lower heater (e.g., second/fourth/sixth/eighth) associated with each zone. EX1003: ¶727.

Fortmann'748 teaches heaters (60) conductively contacting the sheet (23) (forming top surface) overlying the compartment and heaters conductively contacting the sheet (22) (forming planar surface) underlying the compartment. EX1010: ¶¶[0019]-[0020]; EX1003: ¶¶728, 733, 738, 745.

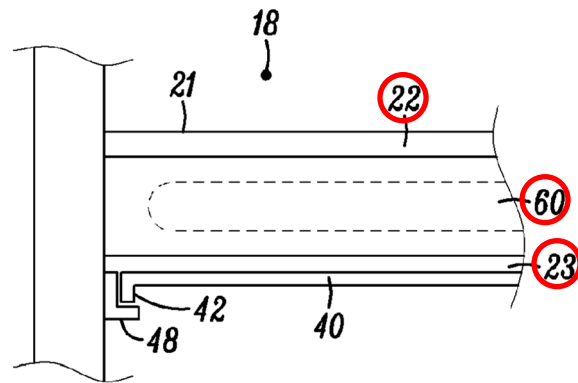
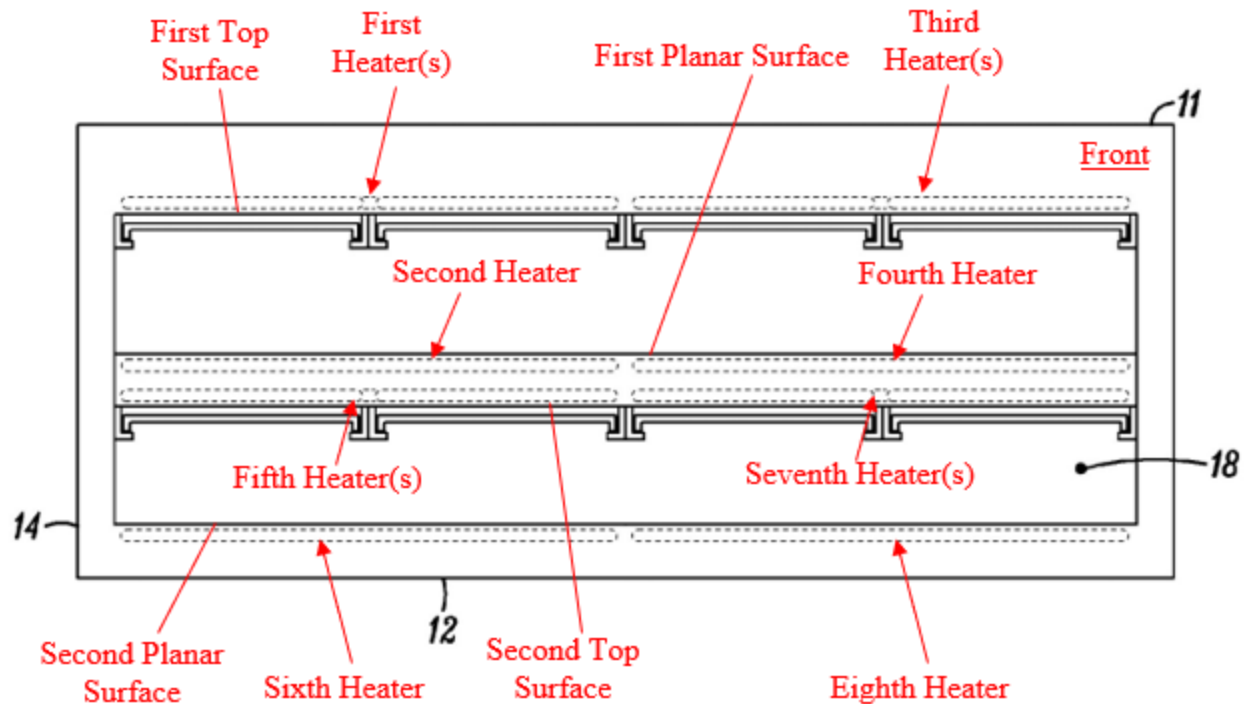


FIG. 3

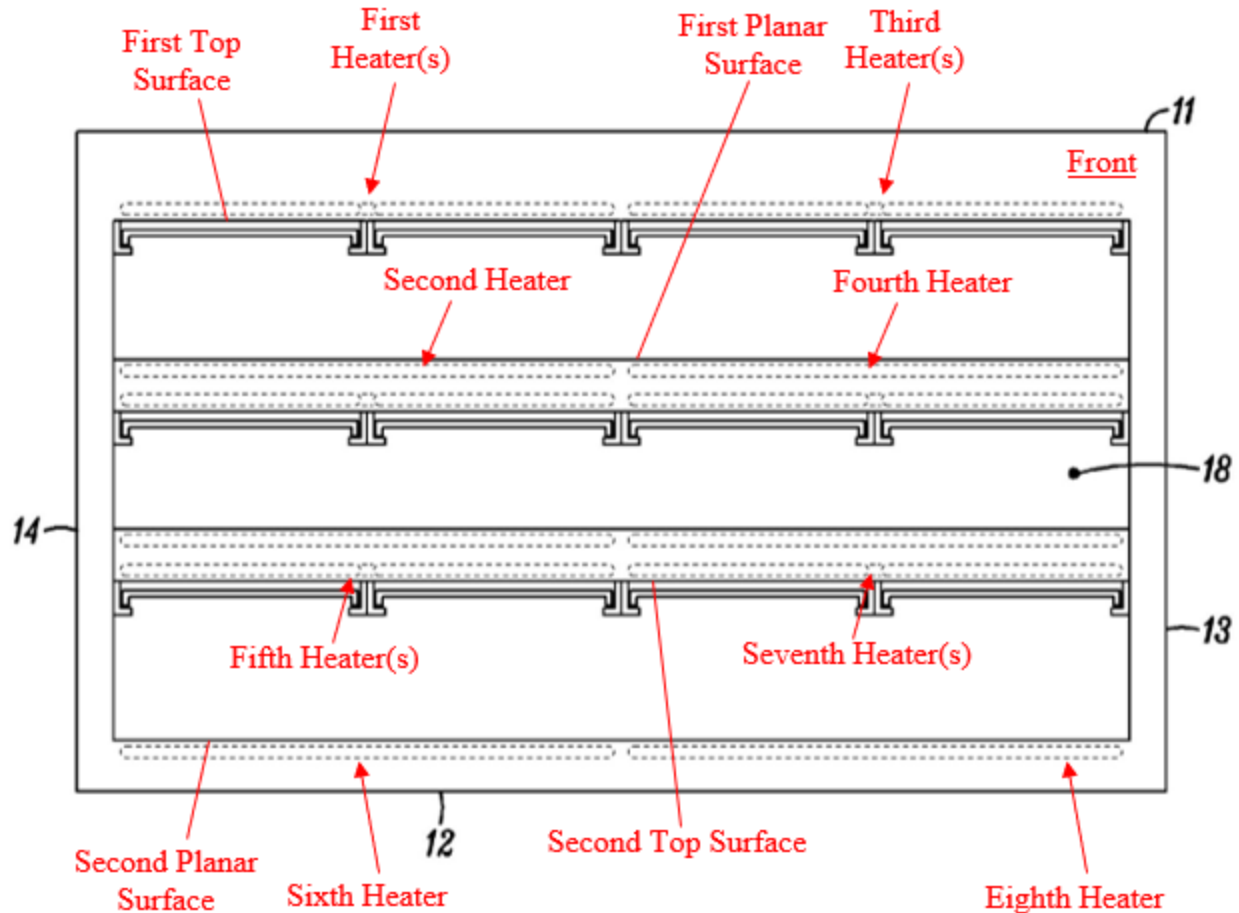
EX1010.

When modifying Fortmann'748's heaters (Section XIII(A)(2)), POSA would follow Fortmann'748 by arranging the upper heaters (first/third; fifth/seventh) to contact the sheets forming the first and second top surfaces, and the lower heaters

(second/fourth; sixth/eighth) to contact the sheets forming the first and second planar surfaces, thereby thermally coupling each heater to its surface to heat its compartment. EX1010: ¶¶[0019]-[0020]; EX1003: ¶¶729-730, 734-735, 739-740, 746-747. The bottom panel is considered a shelf and POSA would have arranged the sixth and eighth heaters in this manner as taught for the other shelves and/or as generally taught by Fortmann'748. EX1010: ¶¶[0016]-[0017]; EX1003: ¶¶741-742, 748-749.



EX1010: Fig. 2 (modified).



EX1010: Fig. 2 (modified).

1.f

Per Section XIII(B)(1.b/1.c/1.d/1.e), it would have been obvious to heat the zones to different temperature setpoints per Jones, Fortmann'748, IRHS Documents, and/or McMillan, thereby making the first-fourth temperatures independent from each other. EX1012: ¶[0098]; EX1006: 1; EX1005: 4, 16, 25, 26; EX1007: 12, 51, 53; EX1019: 4:45-52; EX1010: ¶¶[0024], [0027]; EX1003: ¶¶750-752.

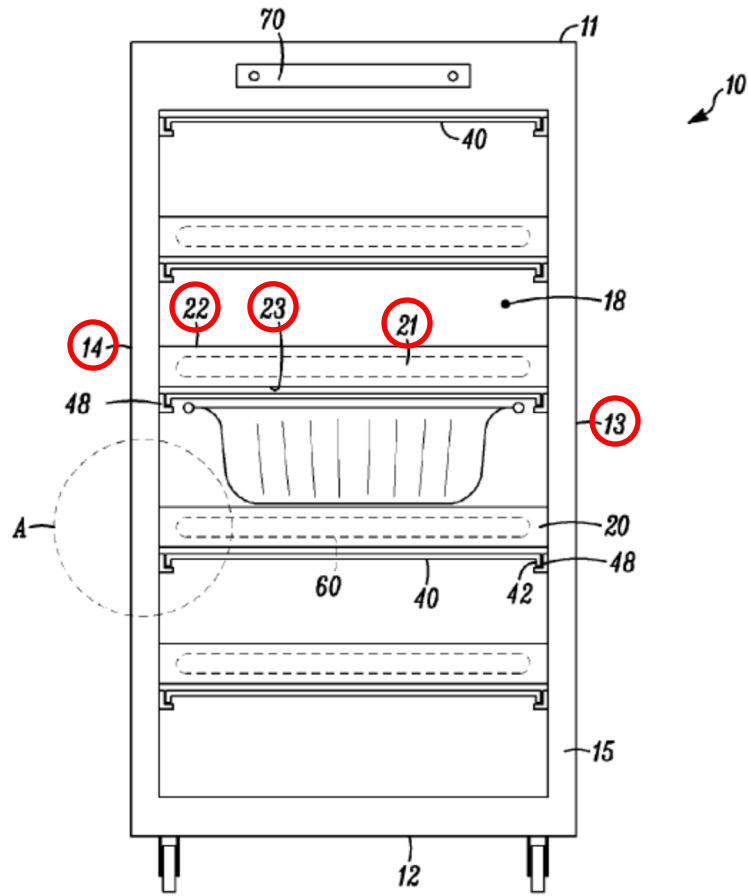


FIG. 2

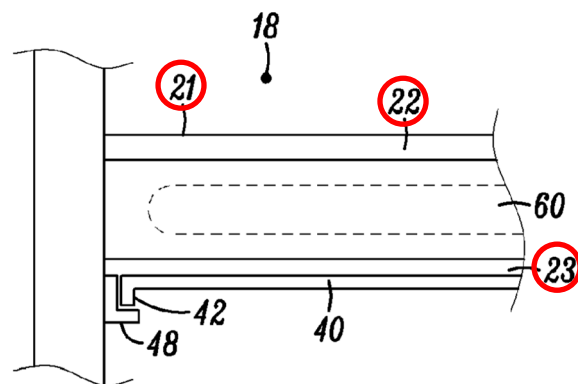
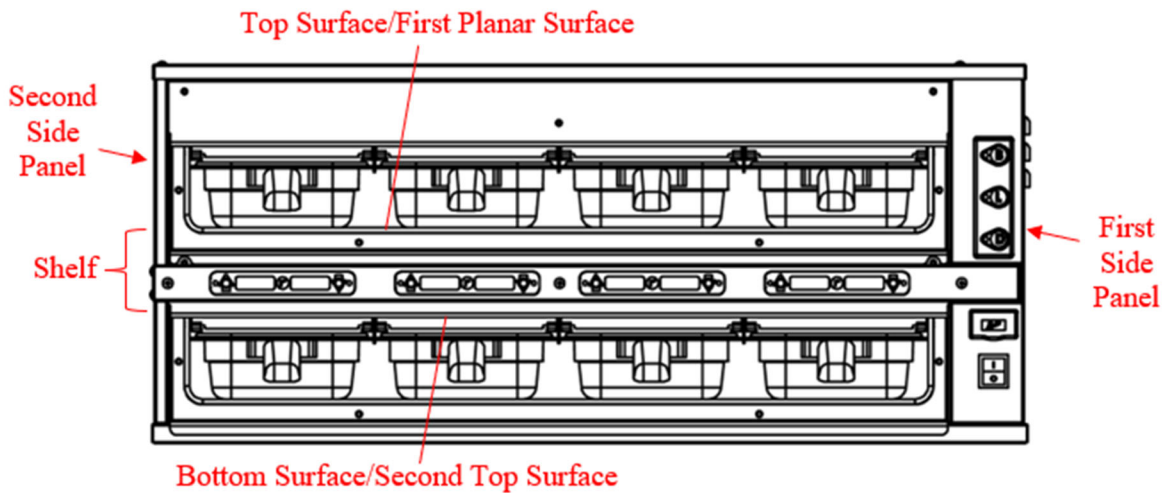


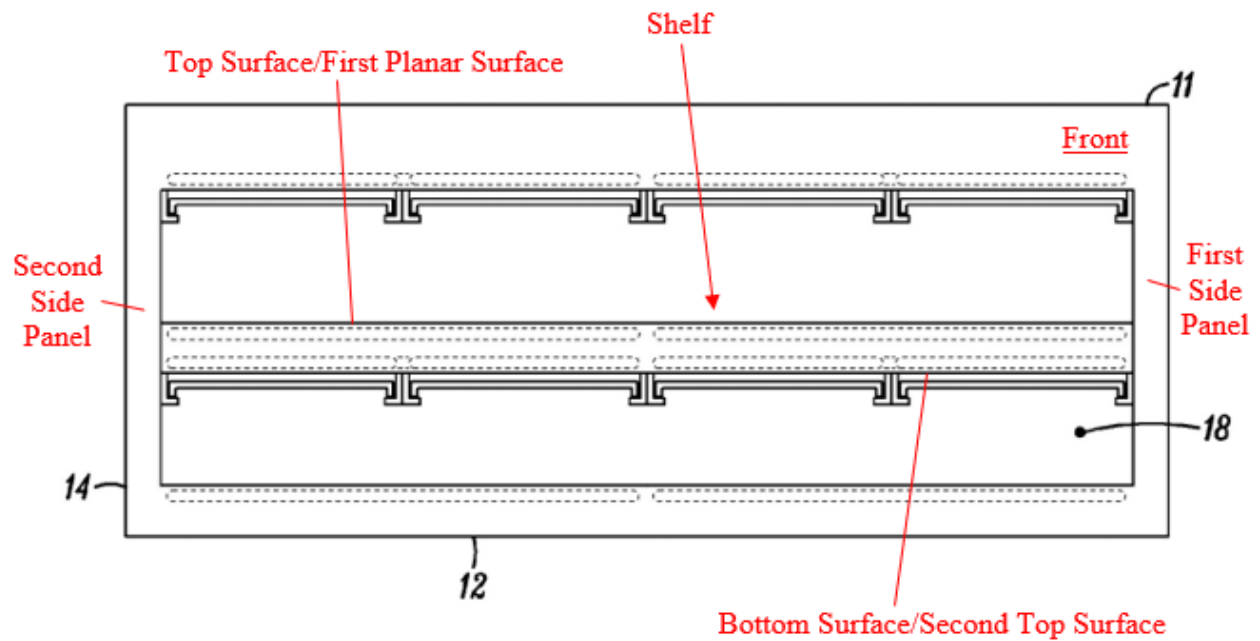
FIG. 3

EX1010.

IRHS24 discloses a 2x4 configuration (shelf separating first and second compartments), such that it would have been obvious to configure Fortmann'748 in a 2x4 configuration (Section XIII(A)(1)), resulting in a shelf between the side panels and first and second compartments, the shelf's top and bottom surfaces providing the respective first planar surface and the second top surface. EX1003: ¶¶756-758.



EX1005: 8.

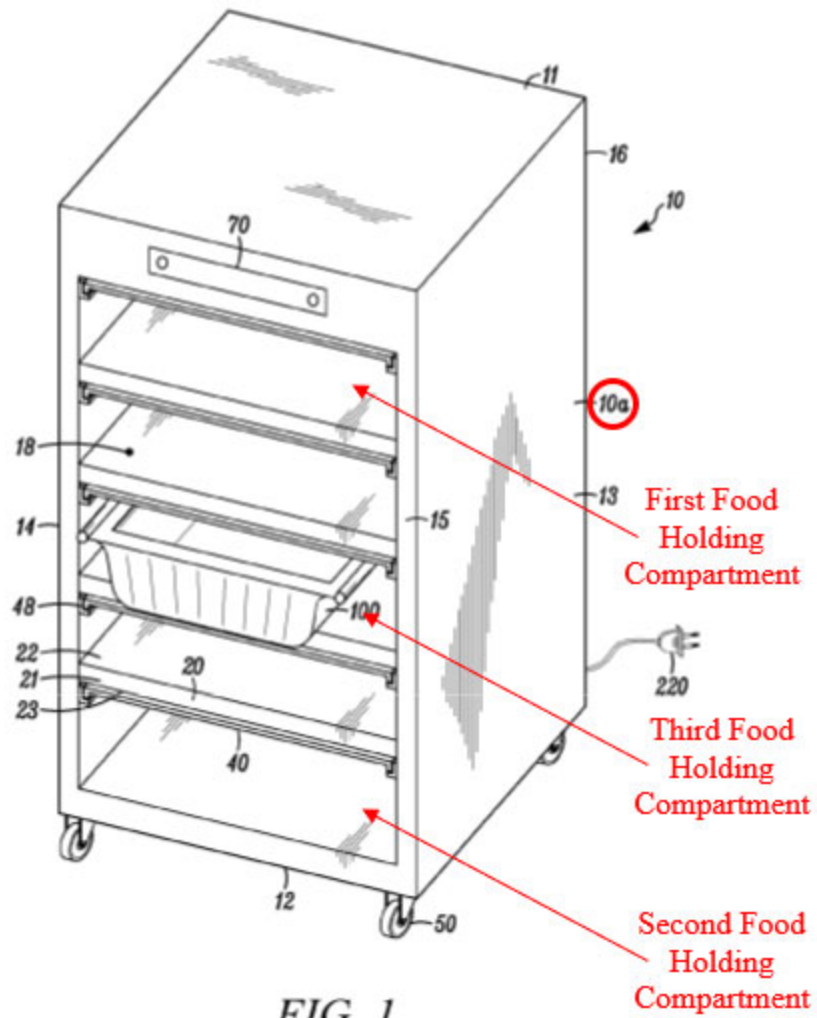


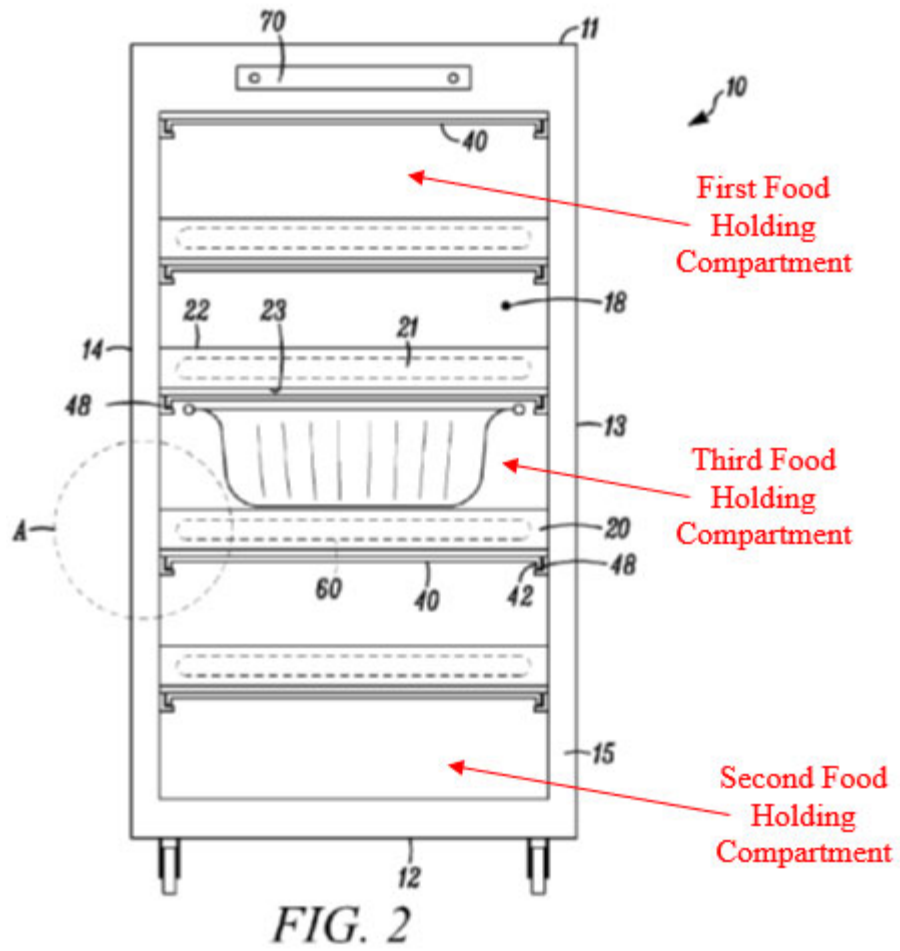
EX1010: Fig. 2 (modified).

D. Claim 3

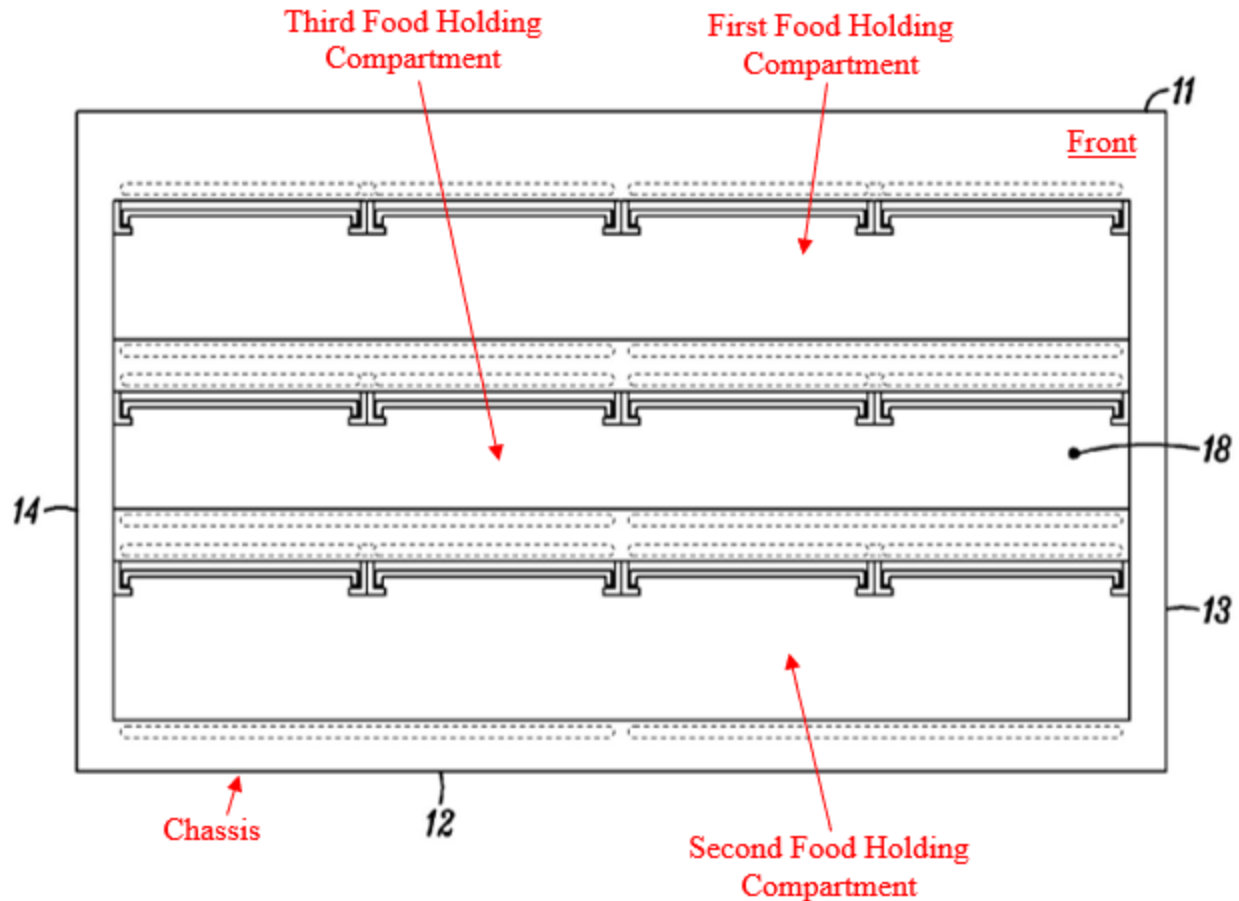
3.a.1

Fortmann'748's third compartment within the chassis (10a) is between the first and second compartments. EX1010: ¶¶[0014]-[0015]; EX1003: ¶¶759-764.





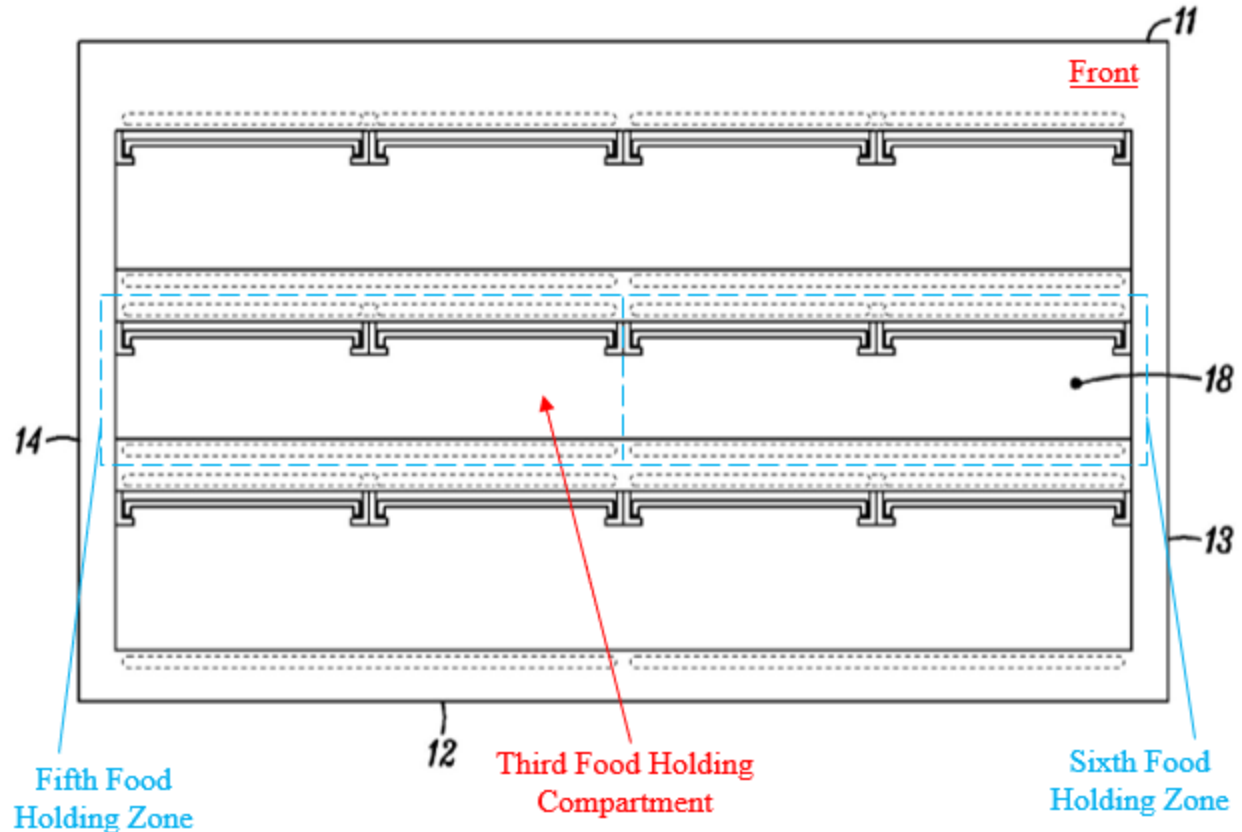
EX1010.



EX1010: Fig. 2 (modified).

3.a.2

Jones, Hartfelder, Stanger, Loy, and/or IRHS Documents disclose multiple zones per compartment such that it would have been obvious to have fifth and sixth zones in the third compartment. Section XIII(A)(2); EX1005: 20, 25, 26; EX1007: 53; EX1012: ¶¶[0069], [0072], [0096]; EX1013: ¶[0037]; EX1042: ¶[0055]; EX1043: Fig. 17; EX1003: ¶765.

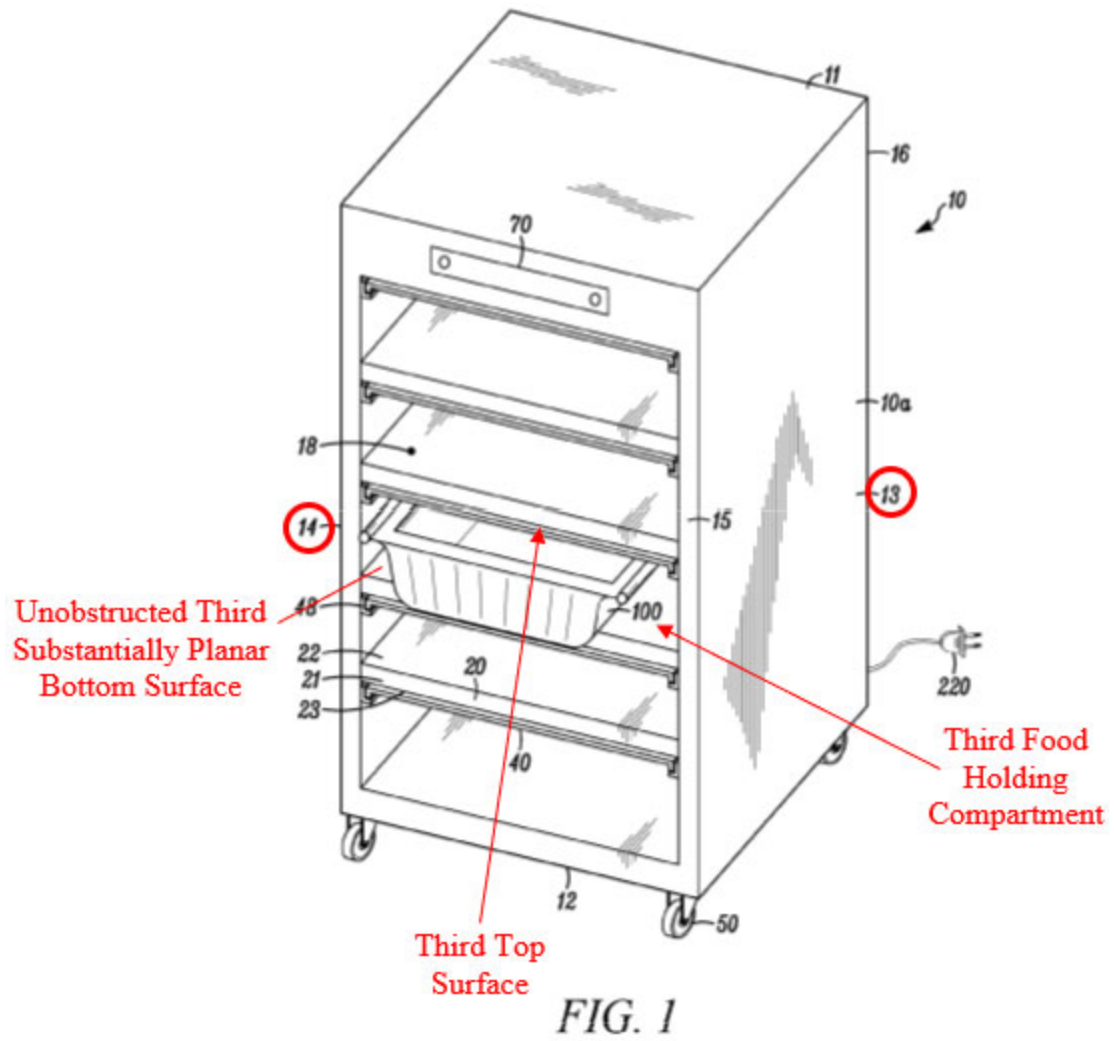


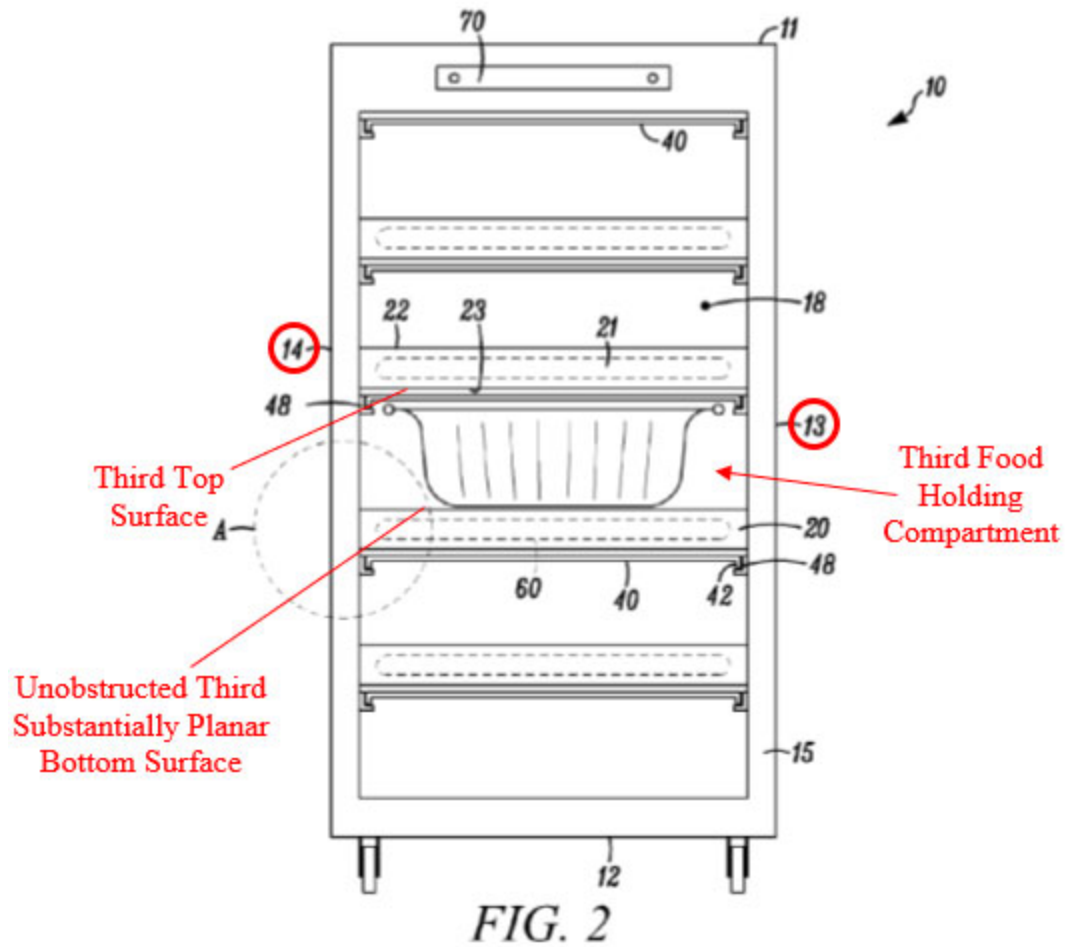
EX1010: Fig. 2 (modified).

3.a.3

First and second side panels (13/14), third top surface, and third planar bottom surface (unobstructed between side panels) define the third compartment.

EX1010: ¶¶[0014]-[0015]; EX1003: ¶¶766-767.

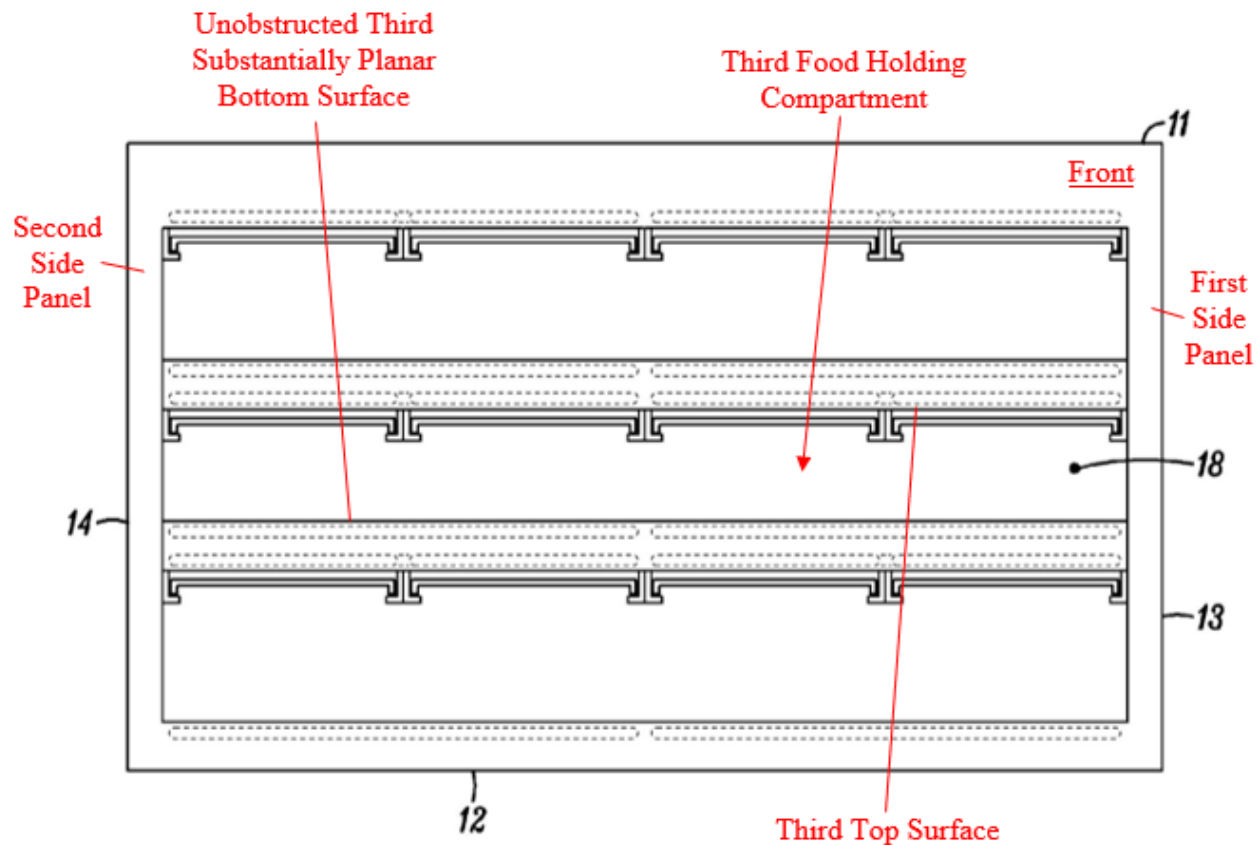




EX1010.

The third planar surface is thermally conductive stainless steel. EX1010:

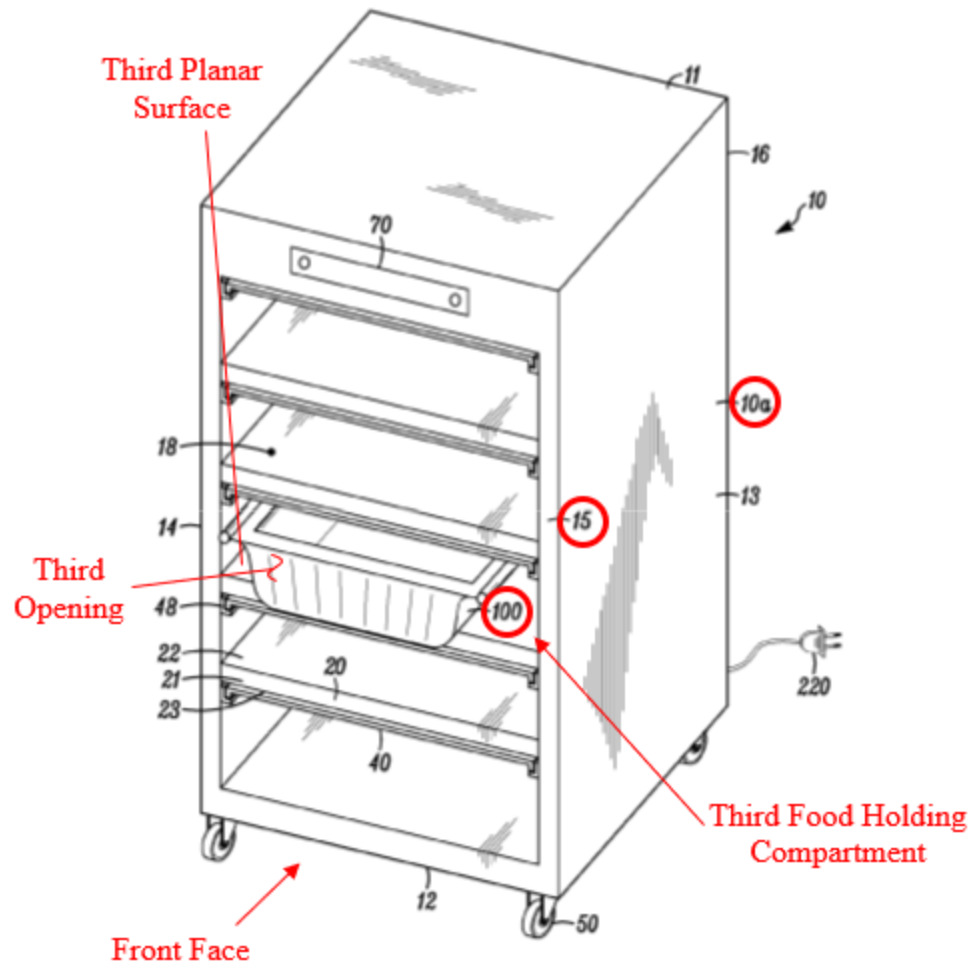
¶[0019]; EX1003: ¶¶768-769.

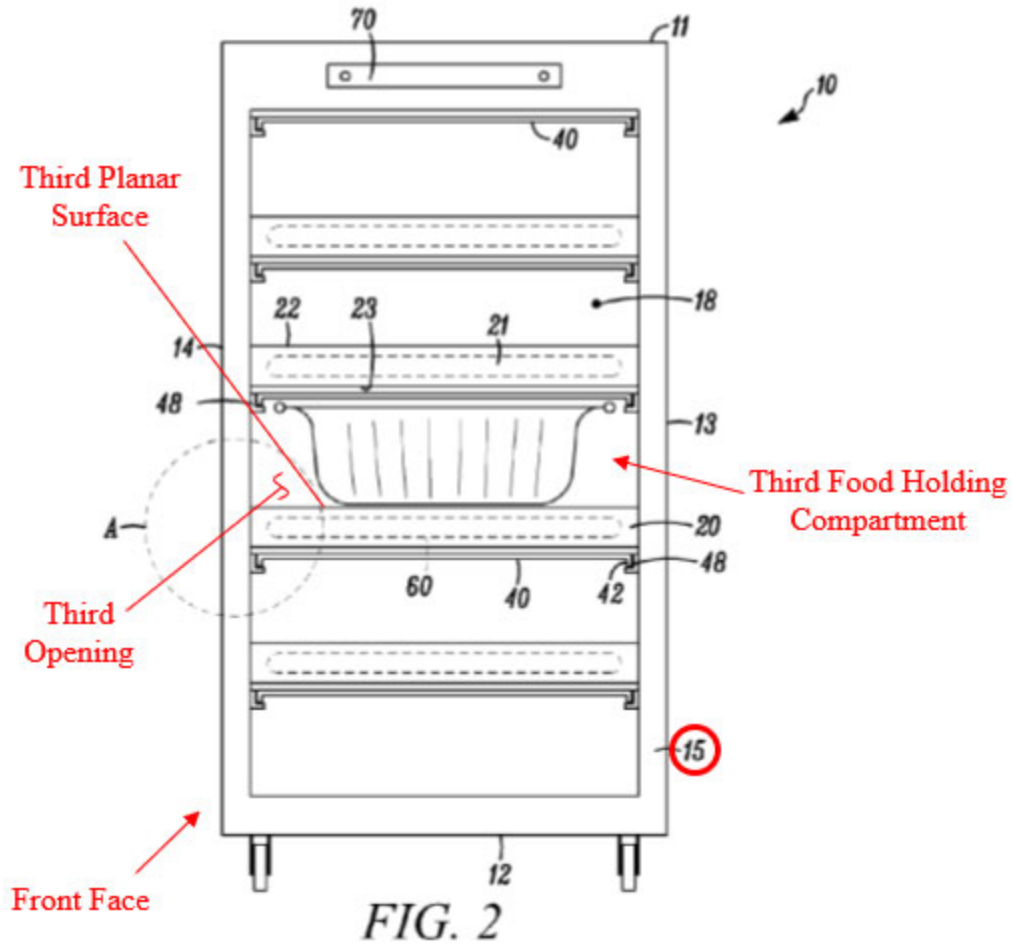


EX1010: Fig. 2 (modified).

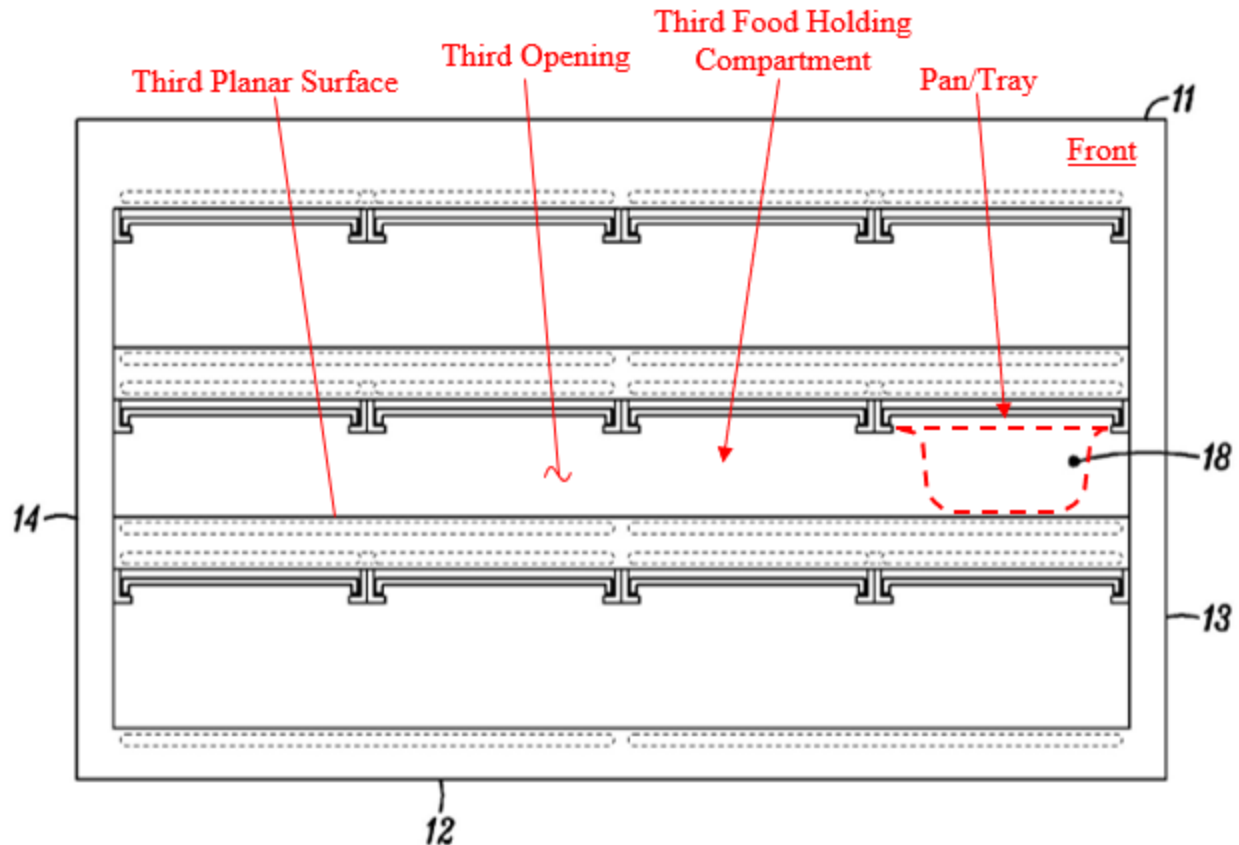
3.a.4

A third opening through the front face allows pan/tray (100) passage into the third compartment onto the third planar surface. EX1010: ¶¶[0014]-[0015]; ¶[0017]; EX1003: ¶¶770-772.





EX1010.



EX1010: Fig. 2 (modified).

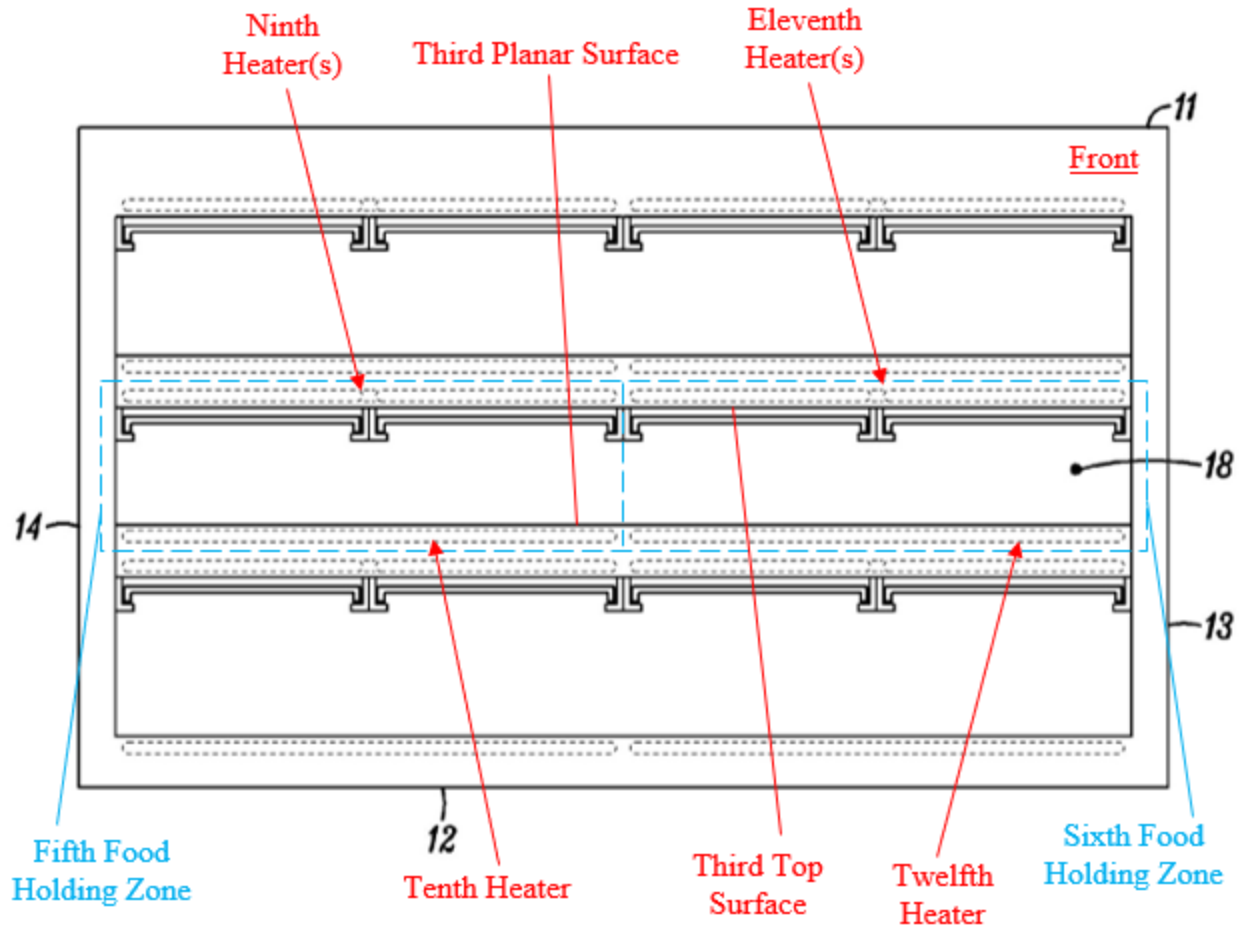
3.b/3.c

Per Sections XIII(A)(2), XIII(B)(1.b/1.c/1.d/1.e), it would have been obvious to have ninth and tenth heaters in the fifth zone and eleventh and twelfth heaters in the sixth zone. EX1003: ¶¶773, 778.

The fifth and sixth zones are similar to the other zones (first-fourth) addressed above, and for reasons per Section XIII(B)(1.b/1.c/1.d/1.e), it would have been obvious for Fortmann'748's controller to operate each zone (including fifth/sixth) to respective temperature setpoints (including fifth/sixth)—based on the specific food type temperature settings assigned to the respective zones—by

independently operating the upper heater(s) (including ninth/eleventh) and independently operating the lower heater (including tenth/twelfth) associated with each zone. EX1003: ¶¶774, 779.

When modifying Fortmann'748's heaters, per Sections XIII(A)(2)-(3), POSA would have followed Fortmann'748 by (1) arranging the ninth and eleventh heaters to contact the sheet forming the third top surface to be thermally coupled with the third top surface to heat the third compartment, and (2) arranging the tenth and twelfth heaters to contact the sheet forming the third planar surface to be thermally coupled with the third planar surface to heat the third compartment. EX1010: ¶¶[0019]-[0020]; EX1003: ¶¶775-777, 780-783.



EX1010: Fig. 2 (modified).

E. Claim 4**4.a.1/4.a.3**

First and second shelves (21) are between the side panels (13/14), the first shelf is between the first and second compartments and the second shelf is between the second and third compartments. EX1010: ¶¶[0014]-[0015]; EX1003: ¶¶784-786, 789-790.

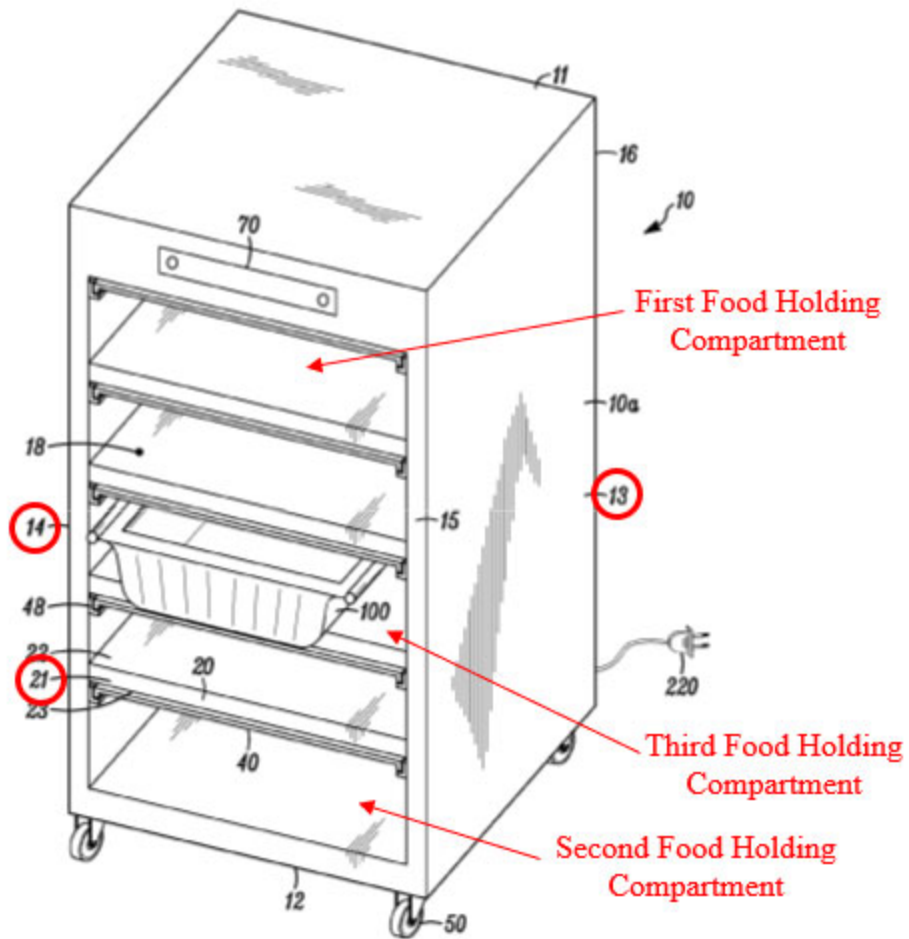
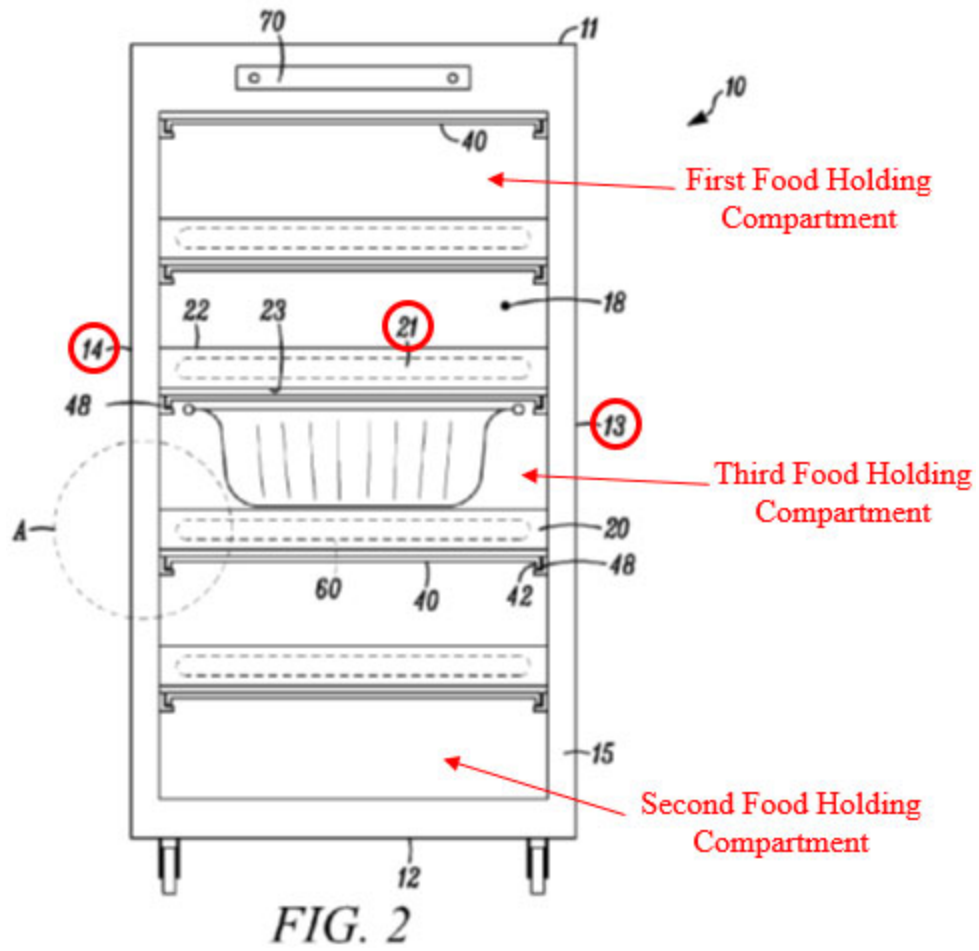
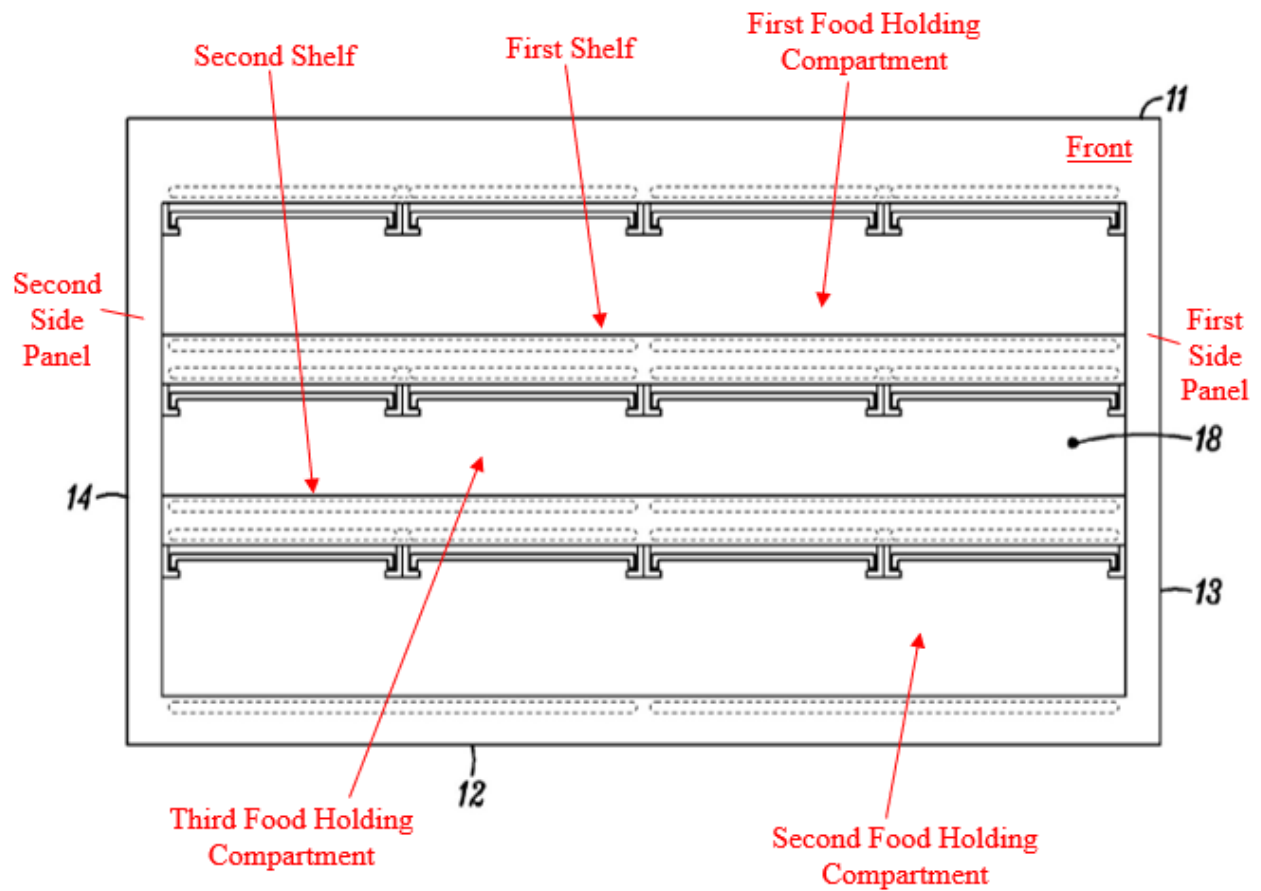


FIG. 1



EX1010.



EX1010: Fig. 2 (modified).

4.a.2/4.a.4

Fortmann'748's shelves (21) have a top (planar bottom) surface (22) and a bottom (top) surface (23). EX1010: ¶¶[0015], [0019]; EX1003: ¶¶787, 791.

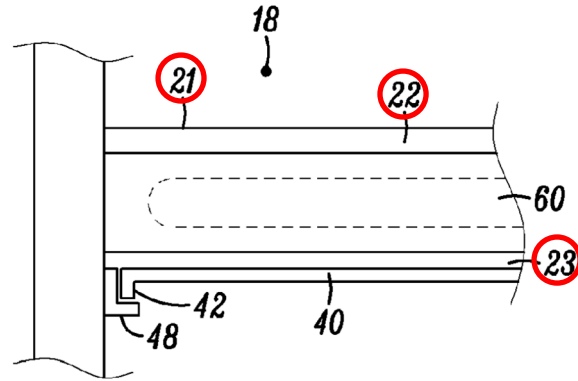
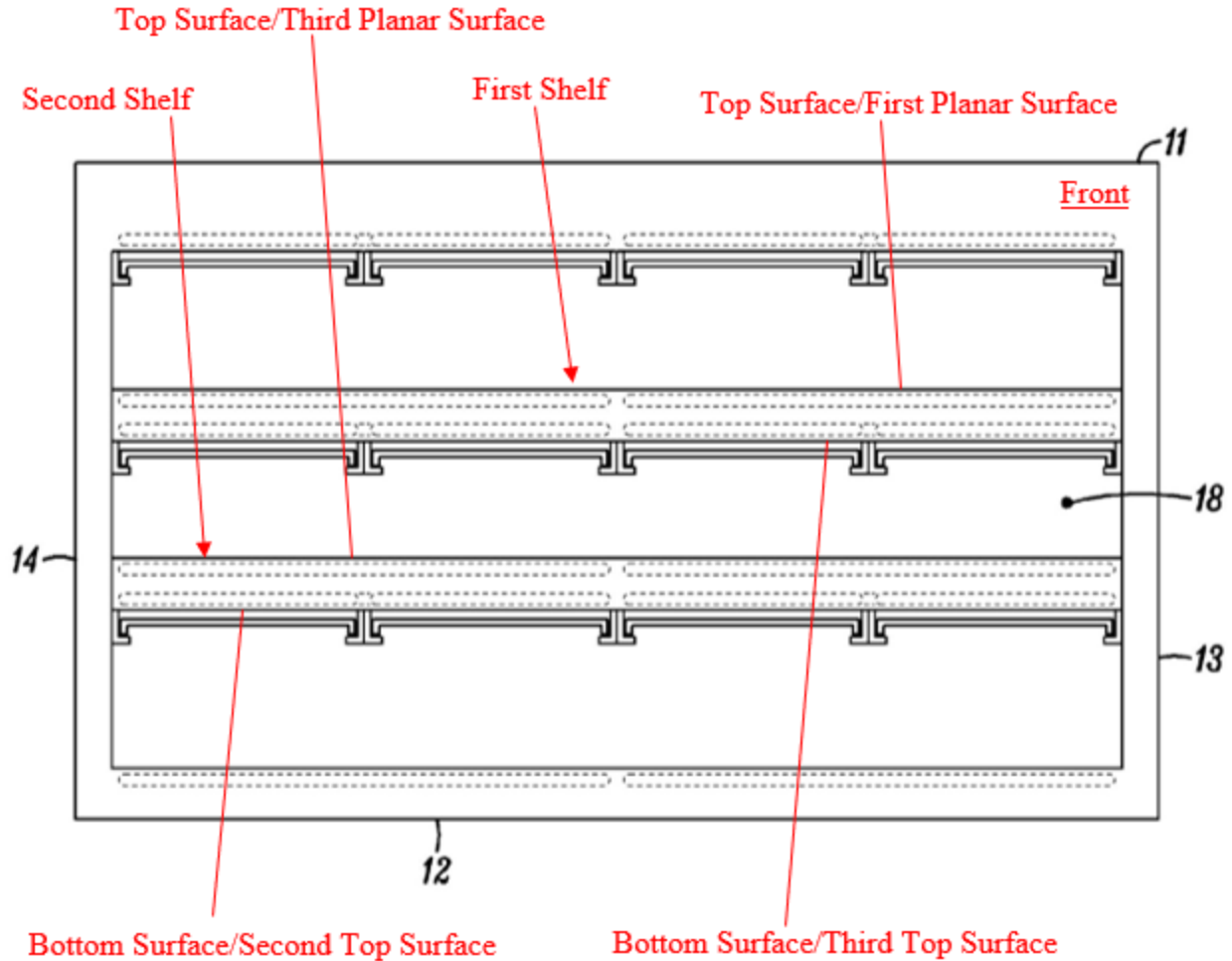


FIG. 3

EX1010.

IRHS34 discloses a 3x4 configuration (two shelves separating first-third compartments), such that it would have been obvious to configure Fortmann'748 in a 3x4 configuration (Section XIII(A)(1)), resulting in the shelves' top surfaces providing the first and third planar surfaces and the shelves' bottom surfaces providing the second and third top surfaces. EX1003: ¶¶788, 792-793.



EX1010: Fig. 2 (modified).

F. Claim 5

Fortmann'748 has "an open front side 15 ... to allow one or more pans 100 to be quickly disposed within the cart." EX1010: ¶¶[0014]-[0015], [0017]; EX1003: ¶¶794-795. The pans contain food products (same or different). EX1010: ¶[0017], ¶[0020], ¶[0024]; EX1003: ¶796. Thus, Fortmann'748 receives first and second pans/trays of respective first and second food products through the first opening into the first compartment, and receives third and fourth pans/trays of

respective third and fourth food products through the second opening into the second compartment. EX1003: ¶¶797, 800, 803, 806.

With Fortmann'748's compartments modified to have zones (Sections XIII(A)(2), XIII(B)(1.a.2/1.a.5)), it would have been obvious to receive pans/trays (first/second/third/fourth) of food product (first/second/third/fourth) through the first and second openings and into the zones (first/second/third/fourth) of the compartments (when filling Fortmann'748 with food) to locate food in the unit via the available openings for warming the food before serving. EX1010: ¶¶[0002], [0024], [0027]; EX1003: ¶¶798-799, 801-802, 804-805, 807-809.

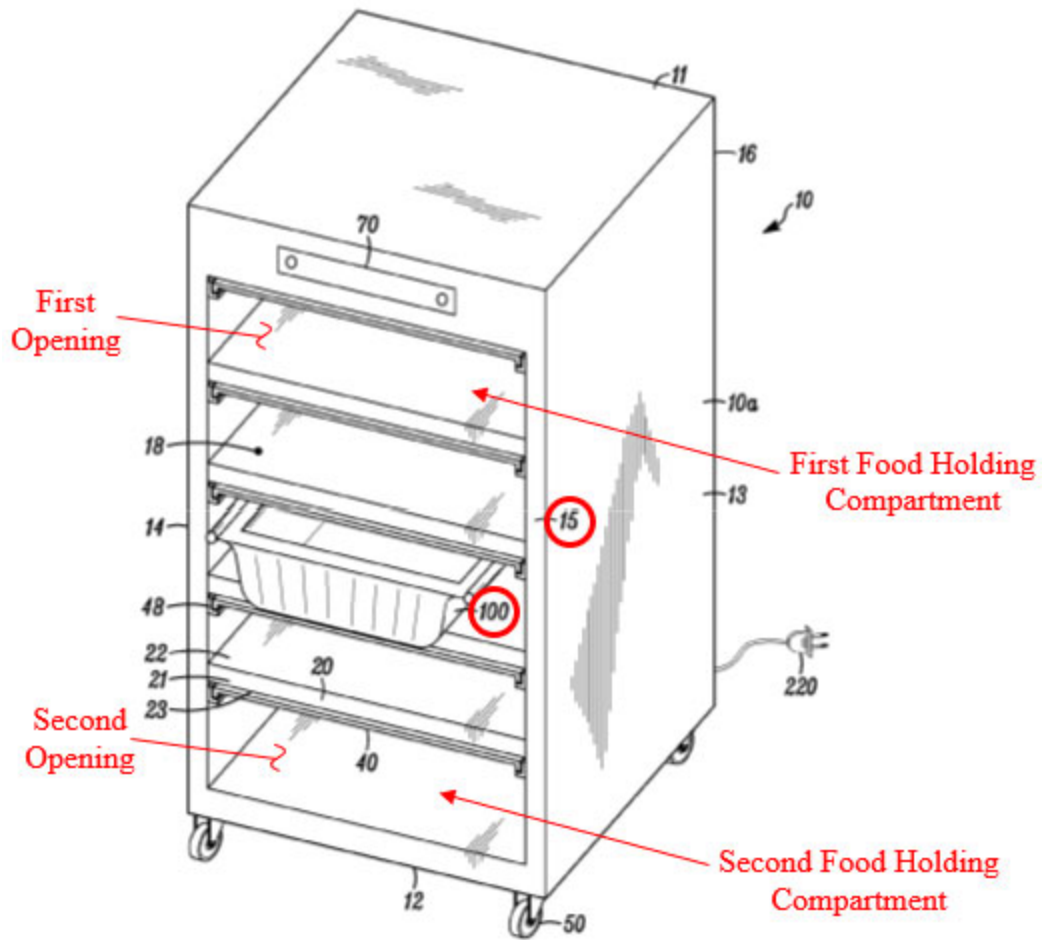


FIG. 1

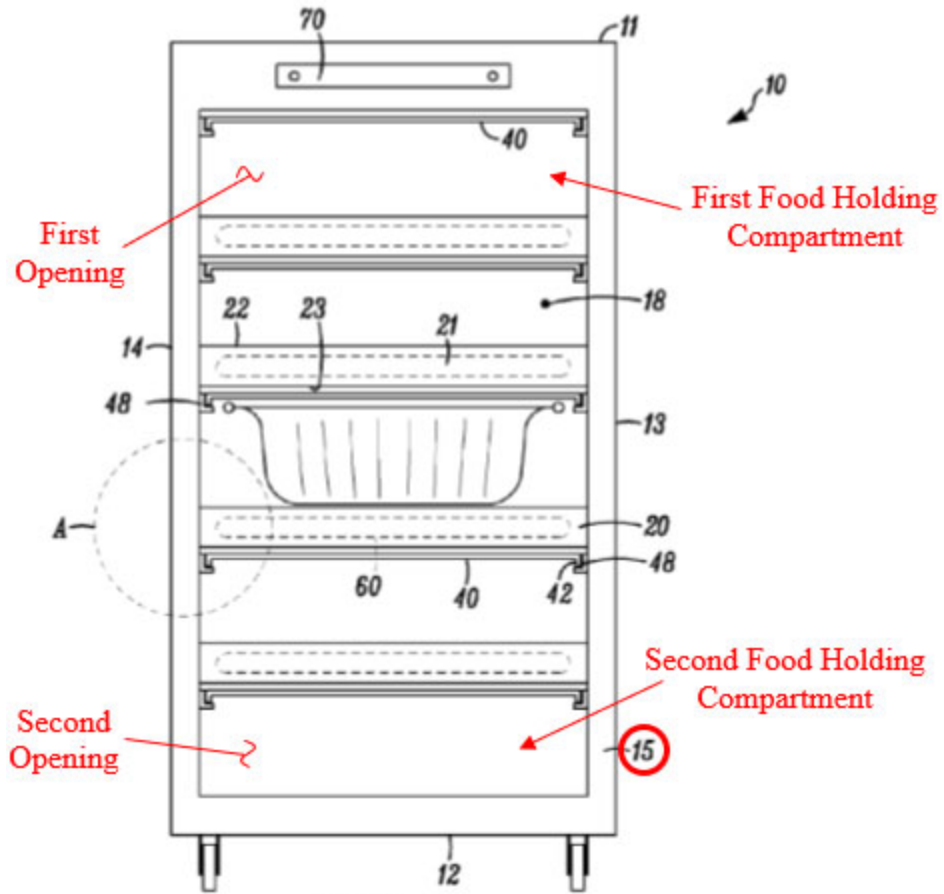
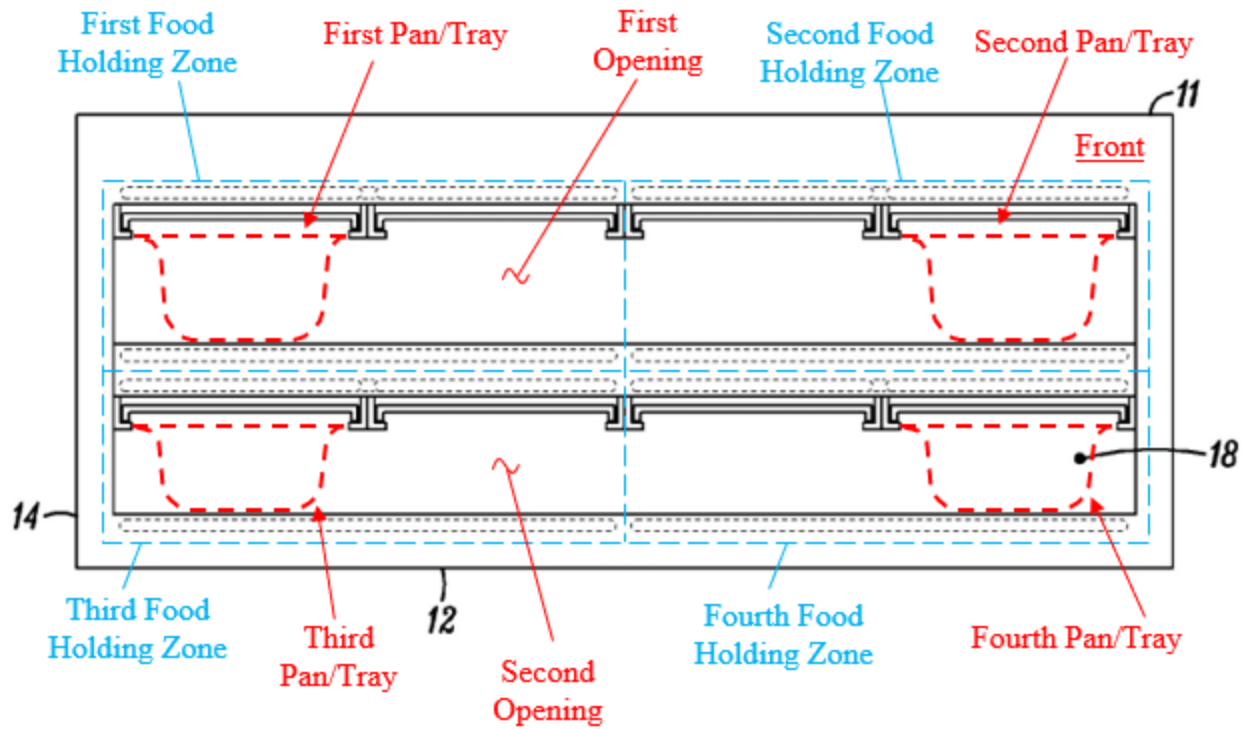


FIG. 2

EX1010.

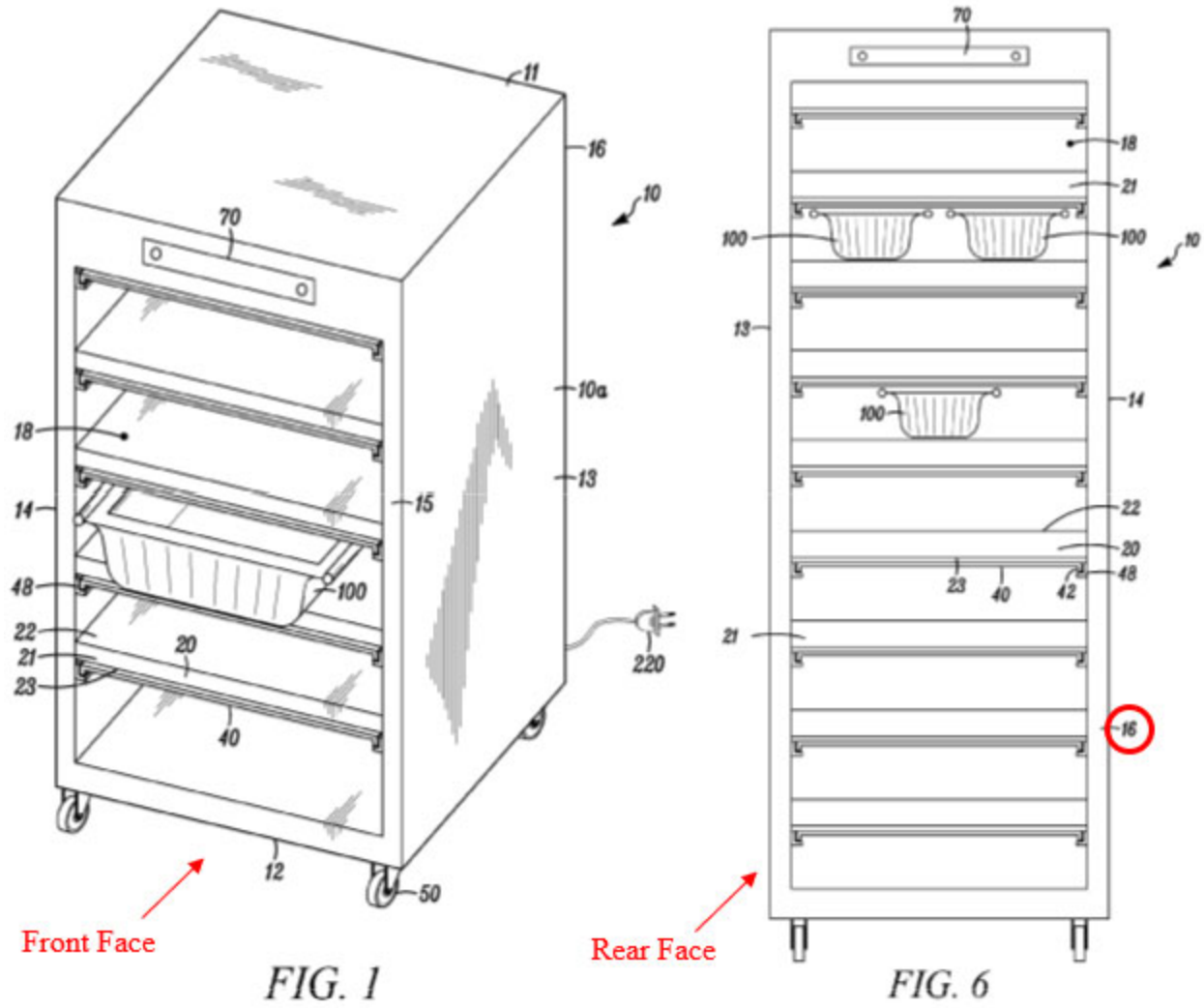


EX1010: Fig. 2 (modified).

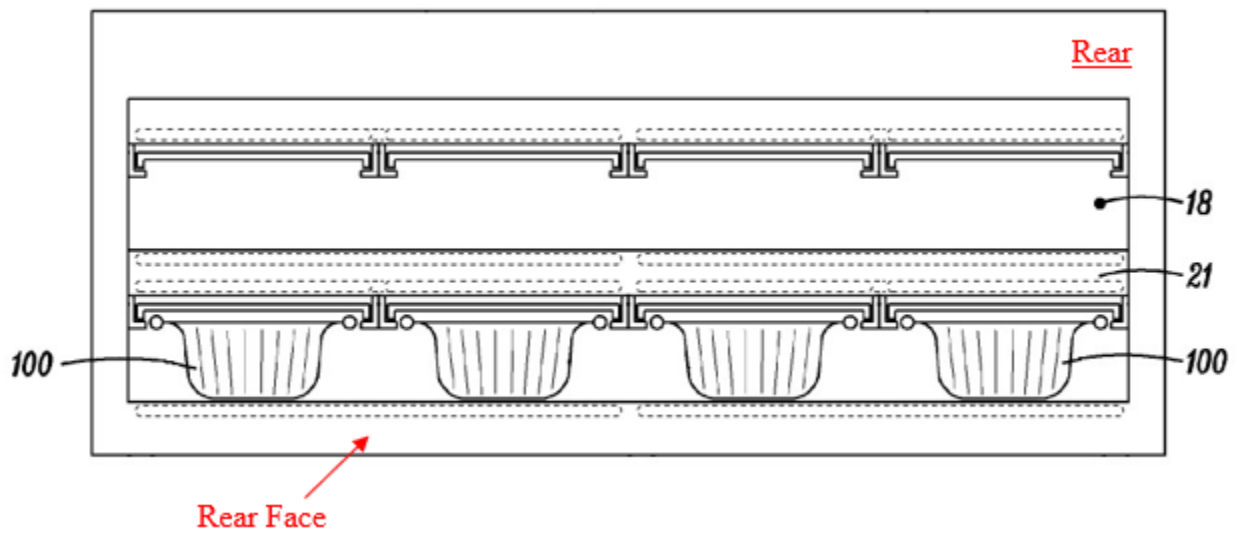
G. Claim 6

6.a

Fortmann'748 has a rear face (16). EX1010: ¶[0014]; EX1003: ¶¶810-812.



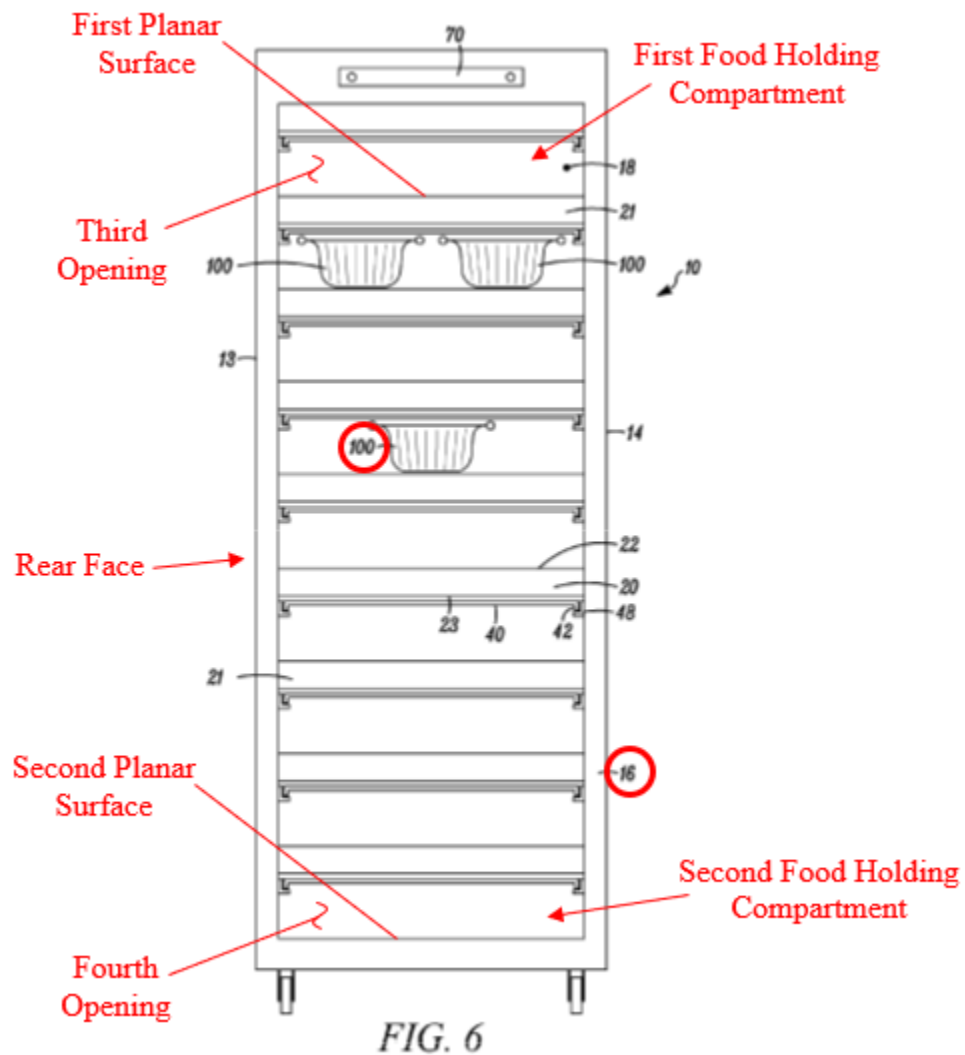
EX1010.



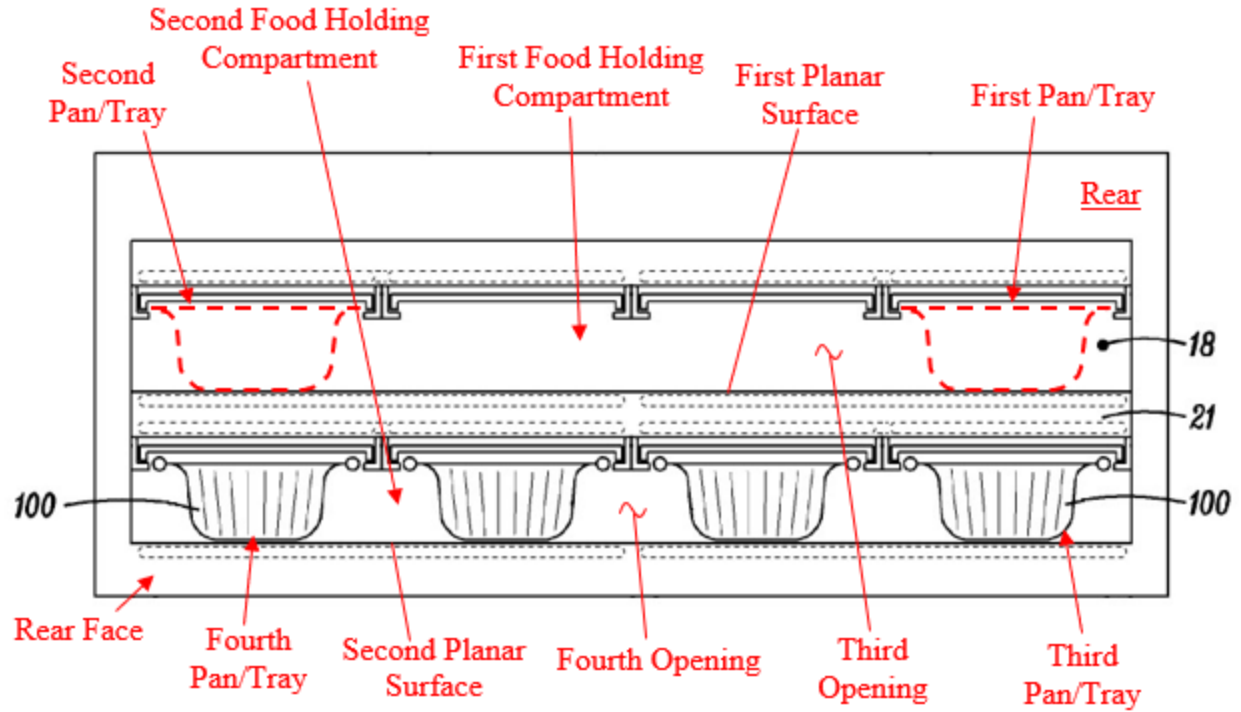
EX1010: Fig. 6 (modified).

6.b/6.c

Third and fourth openings through the rear face allow trays/pans (100) (first-fourth trays/pans) passage into the first and second compartments onto the planar surfaces. EX1010: ¶¶[0014]-[0015]; ¶[0017]; EX1003: ¶¶813-819.



EX1010.



EX1010: Fig. 6 (modified).

H. Claim 7

The first and second pans/trays move through the first and third openings, and the third and fourth pans/trays move through the second and fourth openings.

Sections XIII(F)-(G); EX1010: ¶¶[0014]-[0015], ¶[0017]; EX1003: ¶¶820-823.

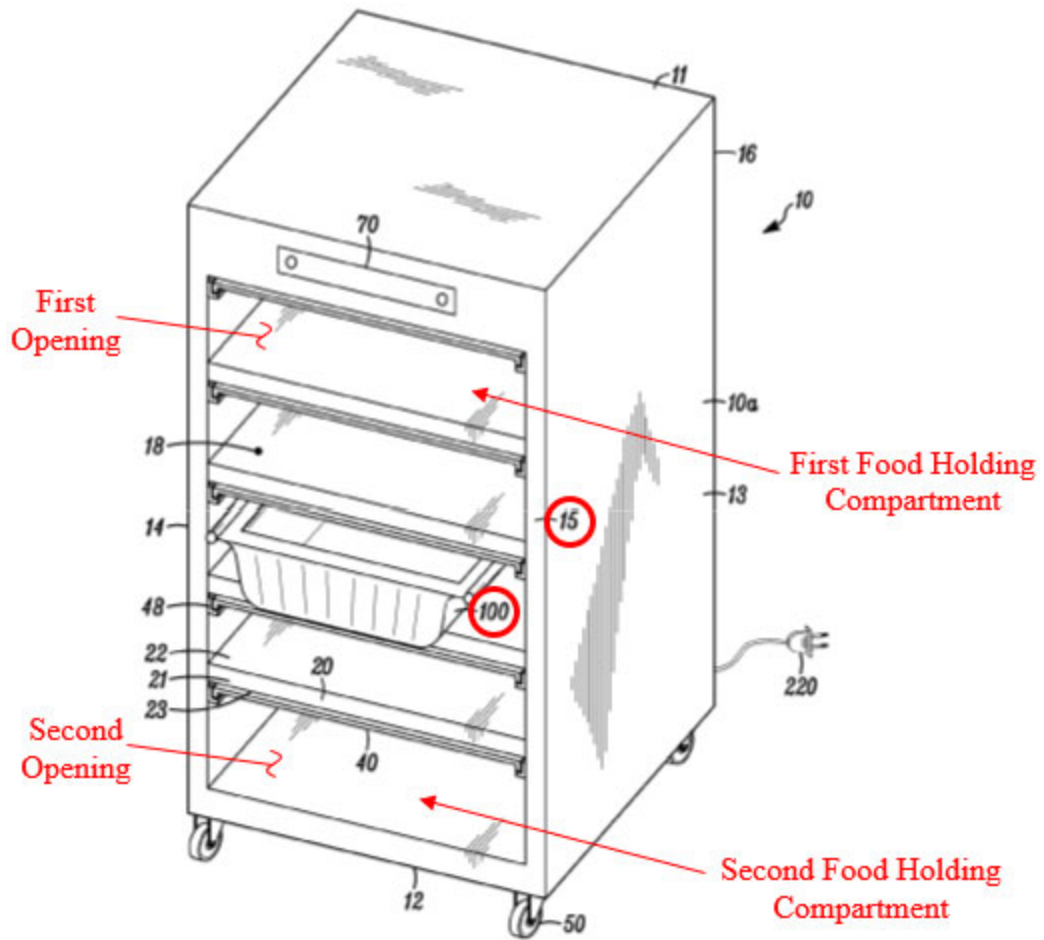
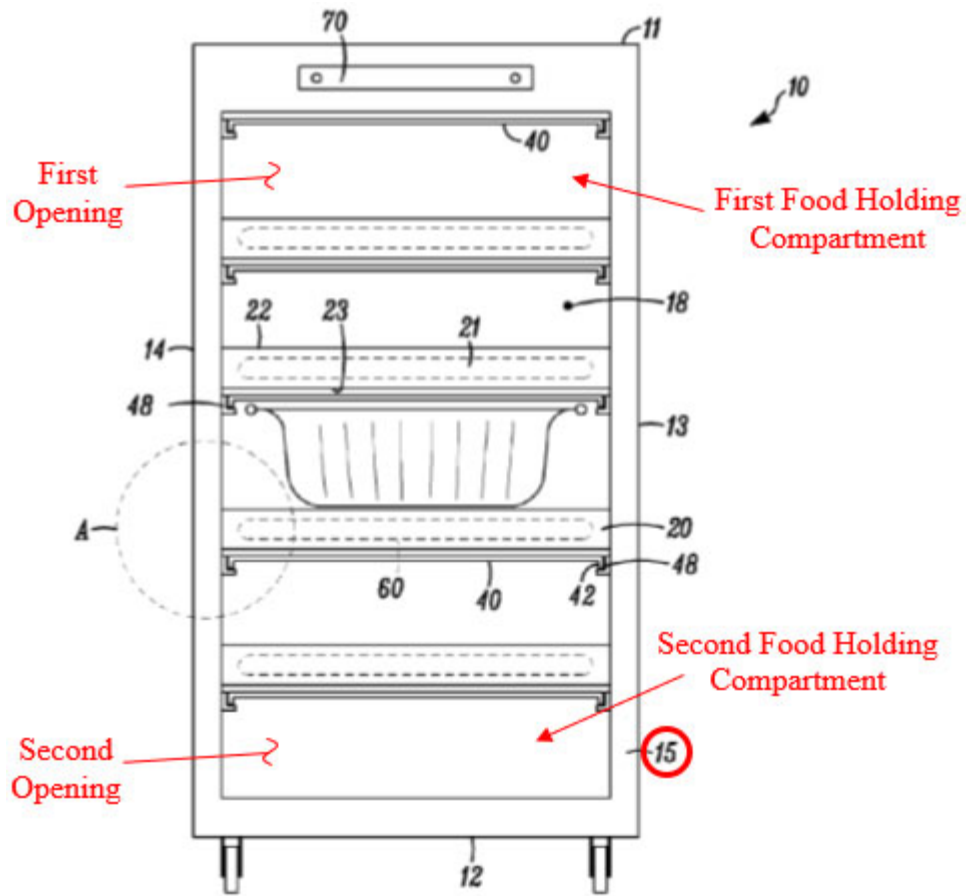
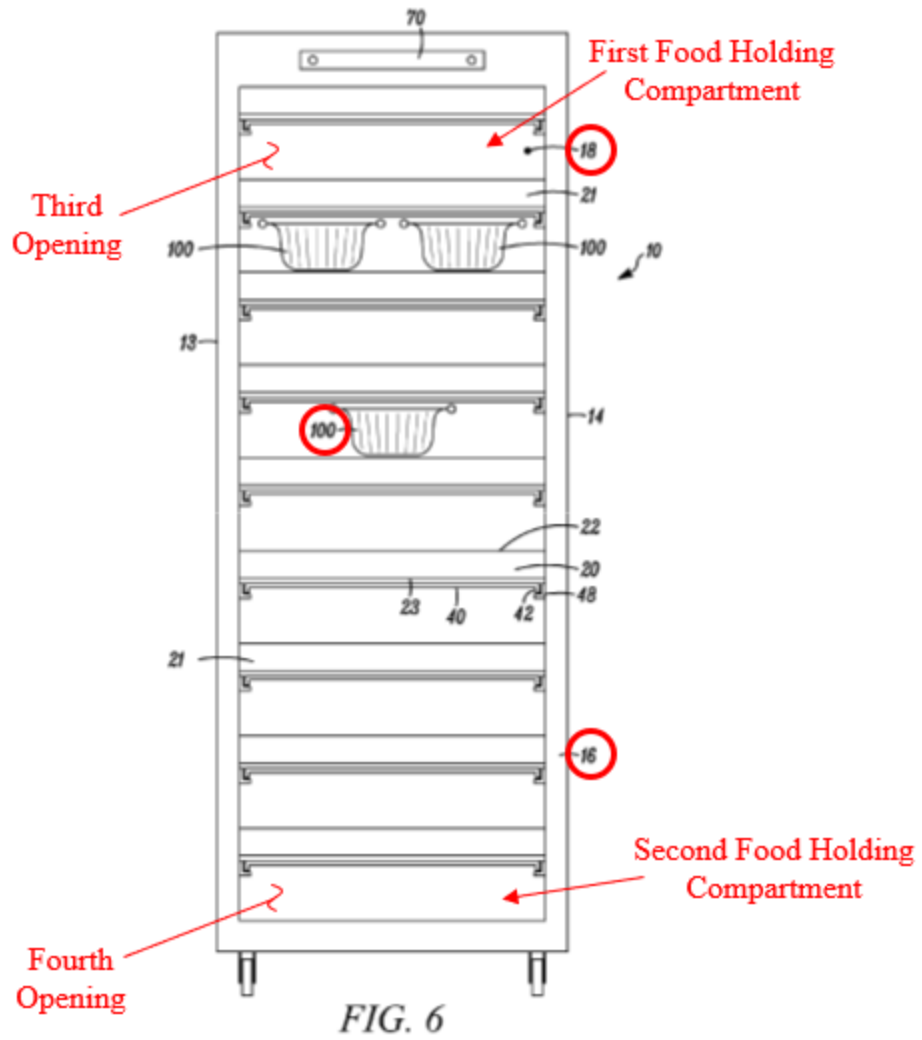
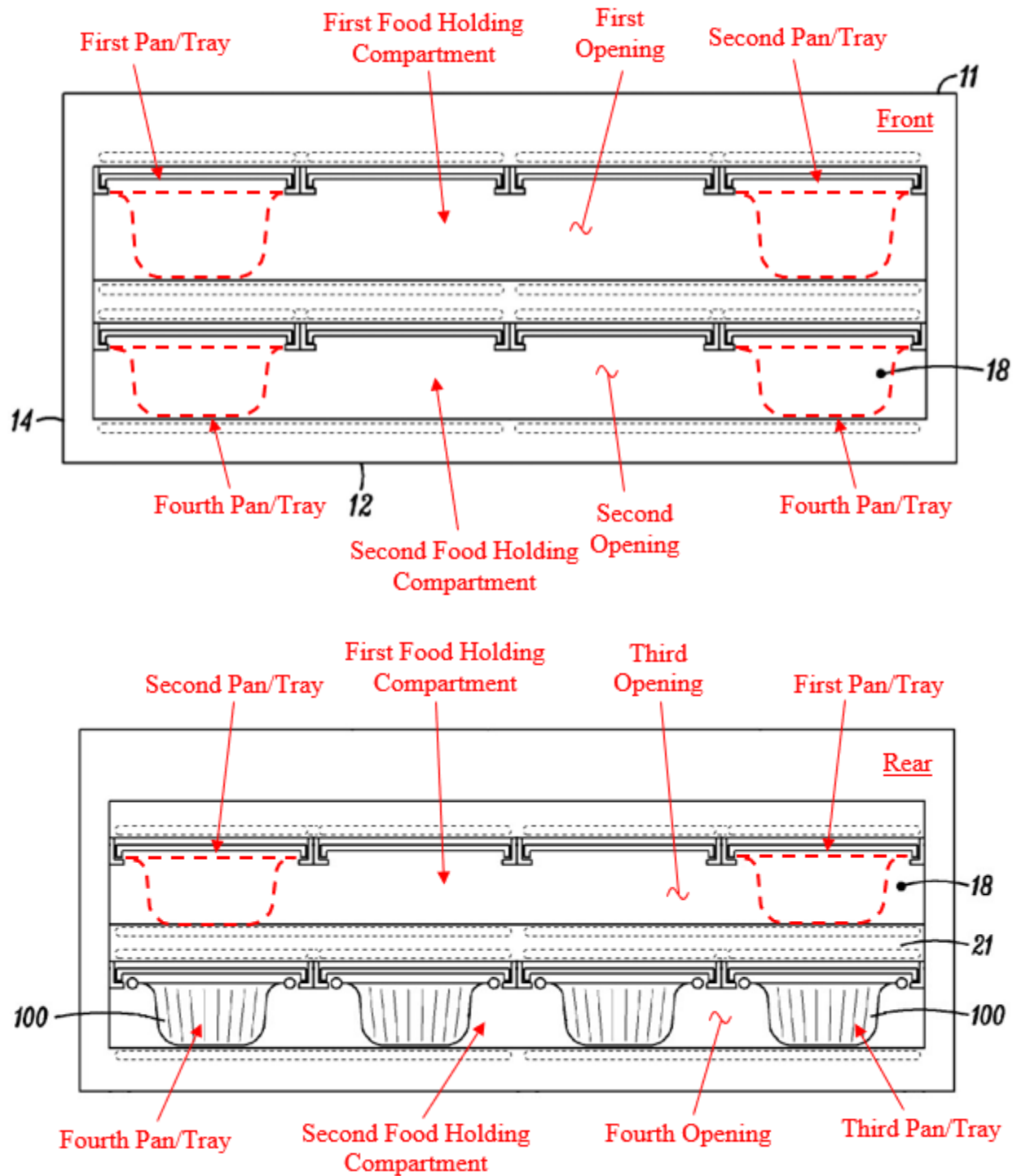


FIG. 1





EX1010.



EX1010: Figs. 2, 6 (modified).

McMillan and Veltrop teach one operator (food preparer/cook) loading food into the compartments from one side and another operator (food server) removing

food from the compartments' other side. EX1019: 3:2-11; EX1022: ¶[0002]; EX1003: ¶¶824-828.

Hartfelder explains users remove pans/trays to access/remove food then reinsert the pans/trays into the compartment. EX1013: ¶[0057], ¶[0062]; EX1003: ¶829.

Per McMillan and/or Veltrop, it would have been obvious to position Fortmann'748 between food cooking and assembly areas to supply/receive pans/trays (first-fourth) of the freshly cooked different food types (first-fourth) into the compartments (first, second) from the rear side via the third and fourth openings to hold the freshly cooked food warm before serving, and remove food (from pans/trays) from the compartments from the front side via the first or second openings, and, per Hartfelder, to receive the pans/trays back in the respective compartments from the front side via the first or second openings after food was removed to continue warming remaining food. EX1019: 3:2-11; EX1022: ¶[0002]; EX1013: ¶[0057], ¶[0062]; EX1003: ¶829.

Such holding unit positioning/use would maintain food warm for serving and facilitate efficient kitchen use, providing cooking and assembly personnel separate, simultaneous access, and reducing bottlenecks, with reasonable expectation of success (Fortmann'748 compartments open front/rear; operation

demonstrated by prior art). EX1007: 67; EX1047: 2:45-55, 8:57-9:16, 10:29-34; EX1048: 5:44-57; EX1022: ¶[0002]; EX1019: 3:2-11; EX1003: ¶¶830-834.

I. Claim 8

8.a

Per the heater and/or bay arrangements of Jones, Hartfelder, Stanger, Loy, and/or IRHS Documents (disclosing/suggesting two bays per zone and heater arrangements for two bays), it would have been obvious (Sections XIII(A)(1)-(2)) for there to be two bays within each zone. EX1005: 8, 25; EX1006: 1; EX1007: 56; EX1010: ¶¶[0014]-[0015]; EX1012: ¶¶[0073], [0096]; EX1013: ¶[0037], Fig. 3; EX1042: ¶[0055]; EX1043: Fig. 17; EX1003: ¶¶835-838.

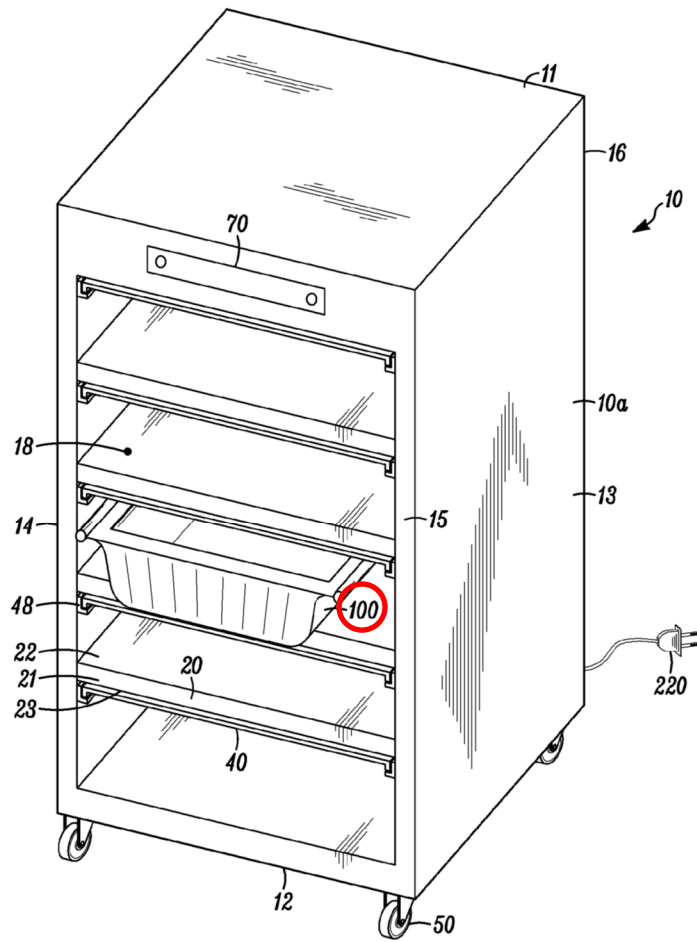


FIG. 1

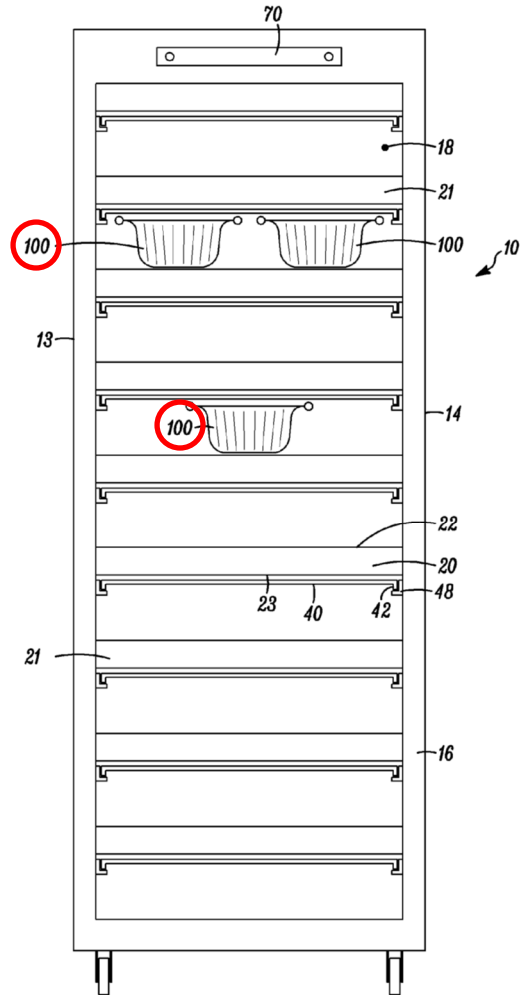
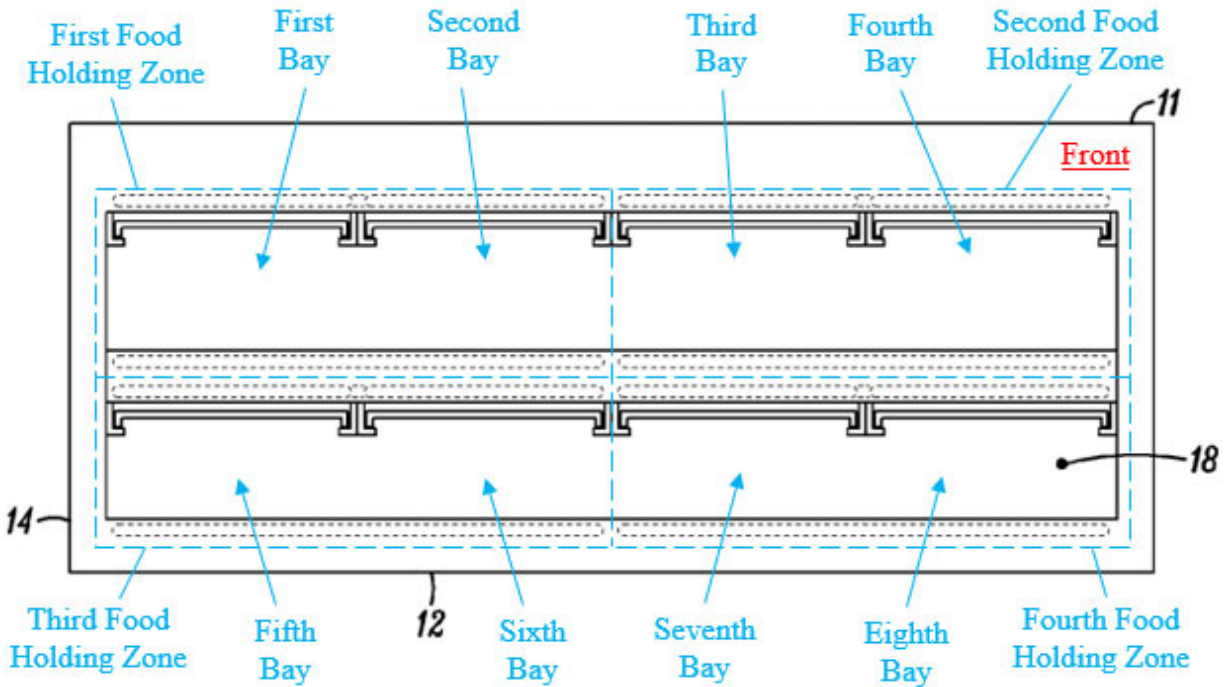


FIG. 6

EX1010.



EX1010: Fig. 2 (modified).

8.b

Fortmann'748's compartments receive pans/trays (100). EX1010: ¶[0014]; EX1003: ¶839. Per Jones, Hartfelder, Stanger, Loy, and/or IRHS Documents (each bay receiving a pan), it would have been obvious (Sections XIII(A)(1)-(2)) for each bay to receive a pan/tray. EX1005: 8, 25; EX1006: 1; EX1007: 56; EX1010: ¶¶[0014]-[0015]; EX1012: ¶¶[0073], [0096]; EX1013: ¶[0037], Fig. 3; EX1042: ¶[0055]; EX1043: Fig. 17; EX1003: ¶¶840-841.

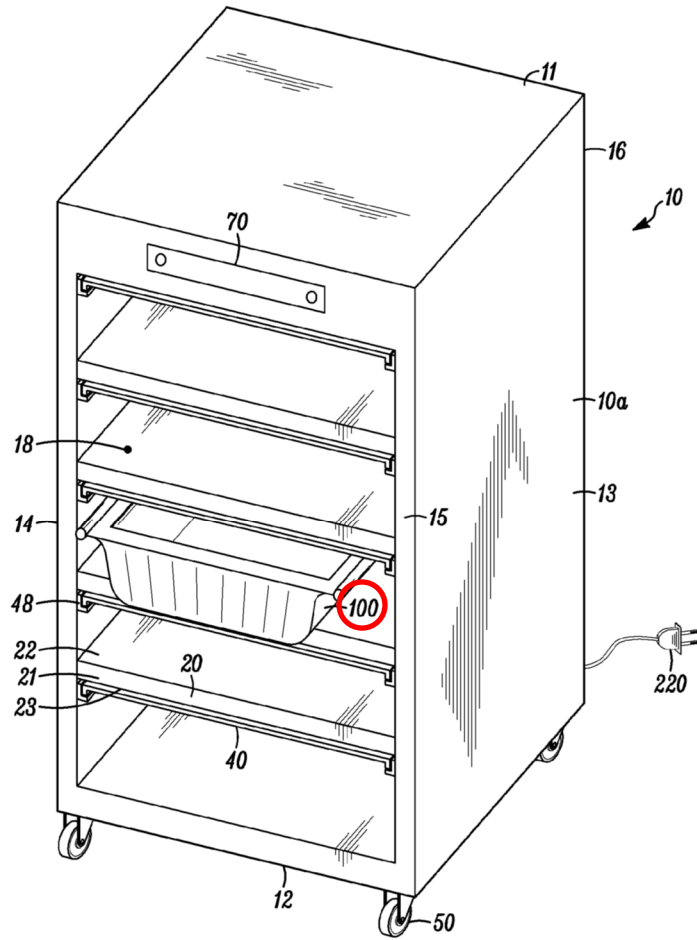


FIG. 1

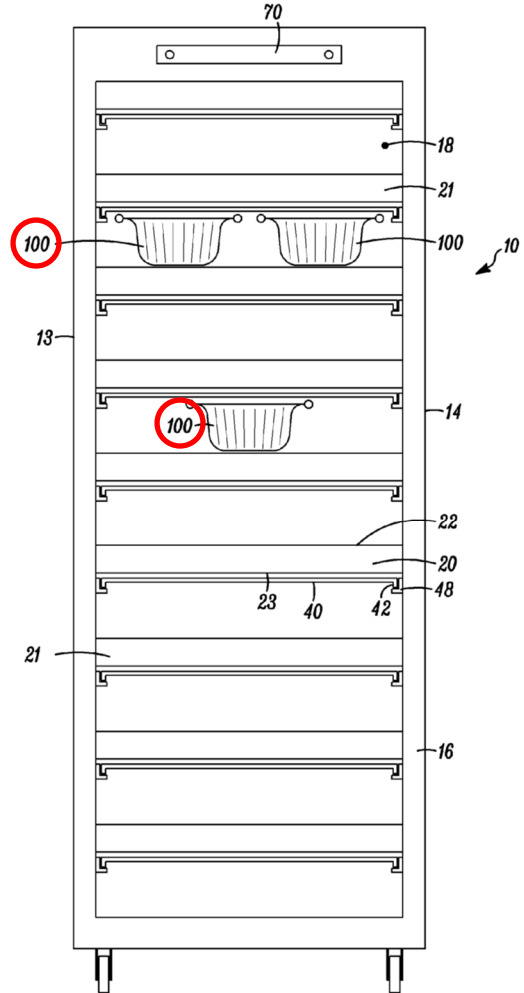
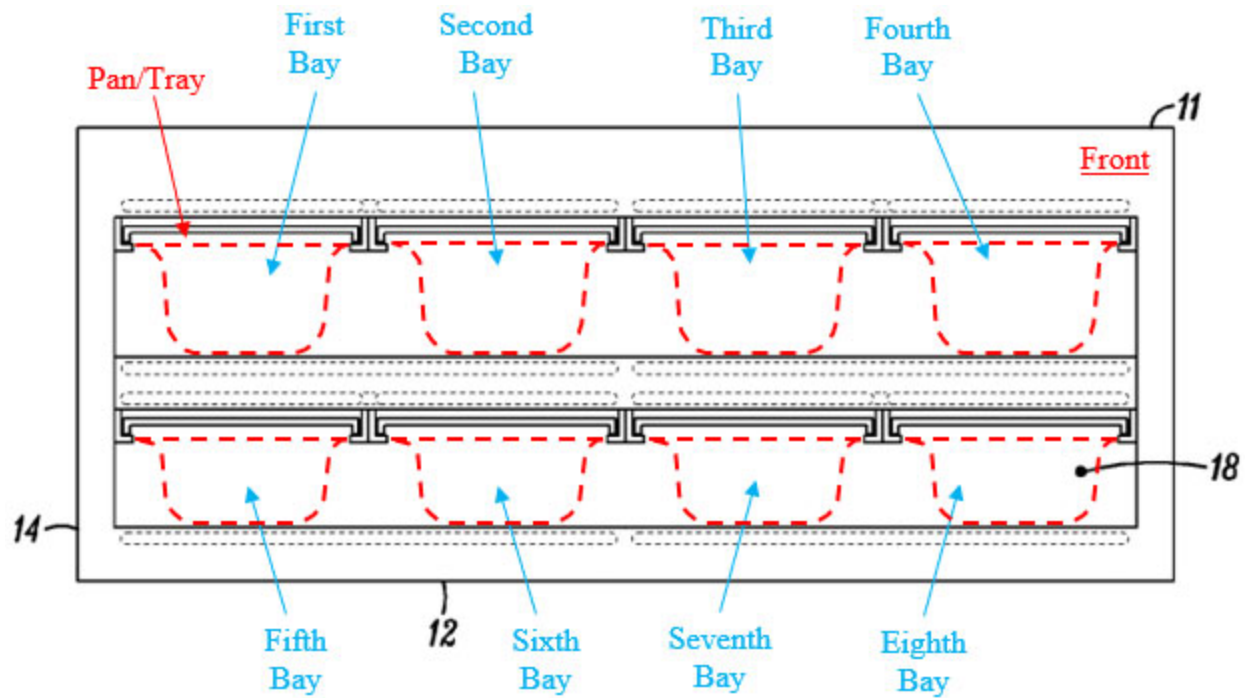


FIG. 6

EX1010.



EX1010: Fig. 2 (modified).

J. Claim 9

Fortmann'748's top panel (11) and shelves (21) include lids (40) on tracks (48) (lid-holding shelves). EX1010: ¶¶[0017]-[0018]; EX1003: ¶¶842-843.

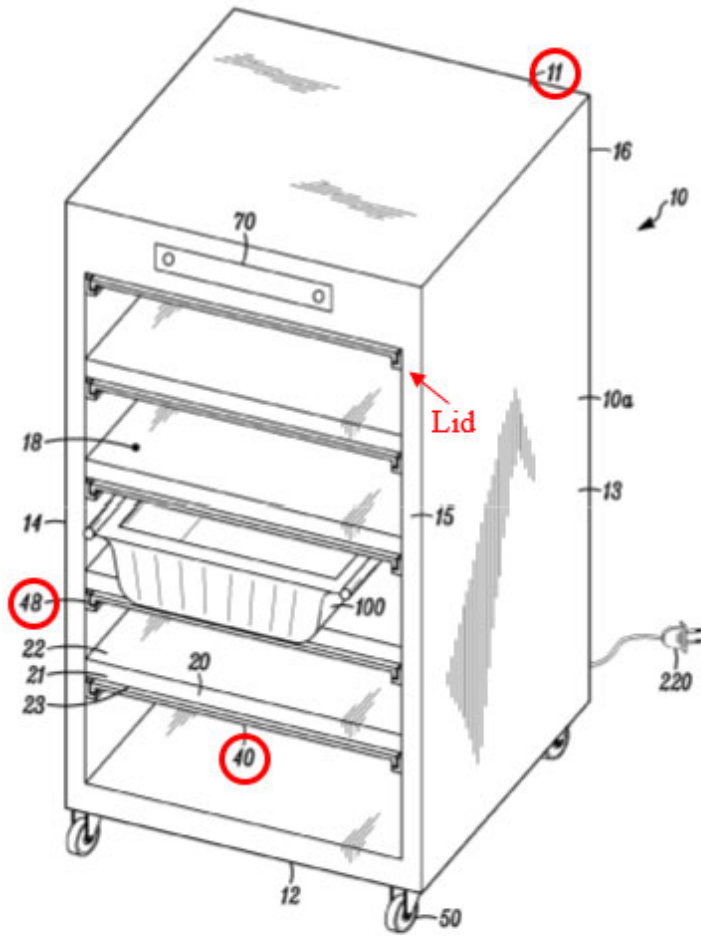


FIG. 1

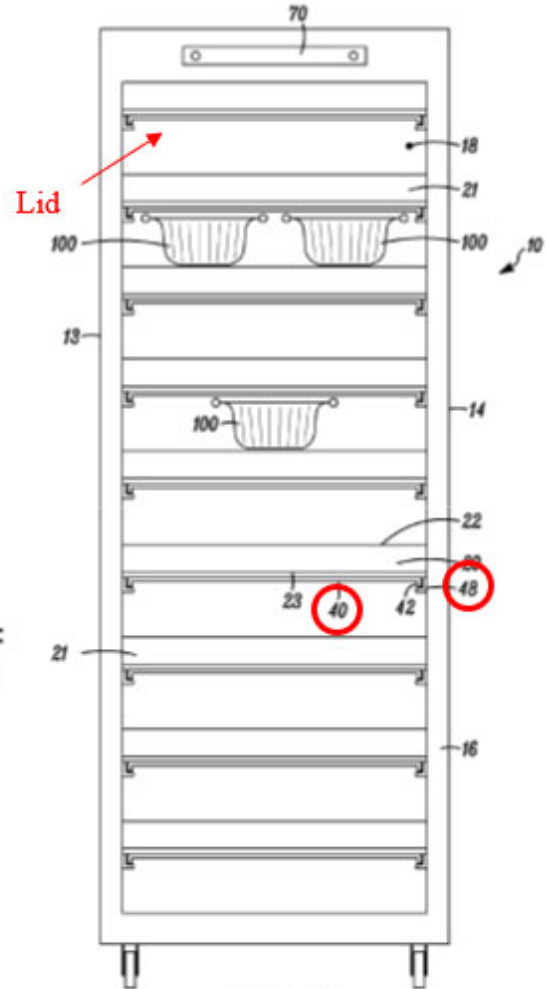


FIG. 6

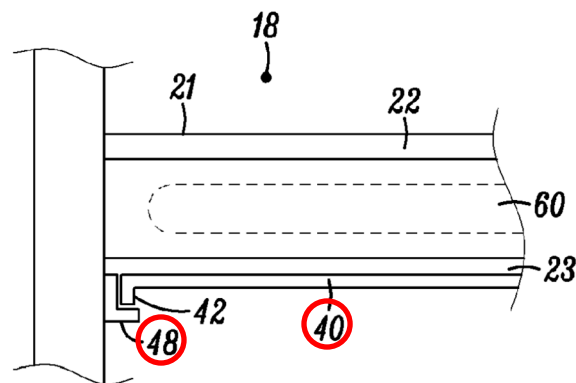
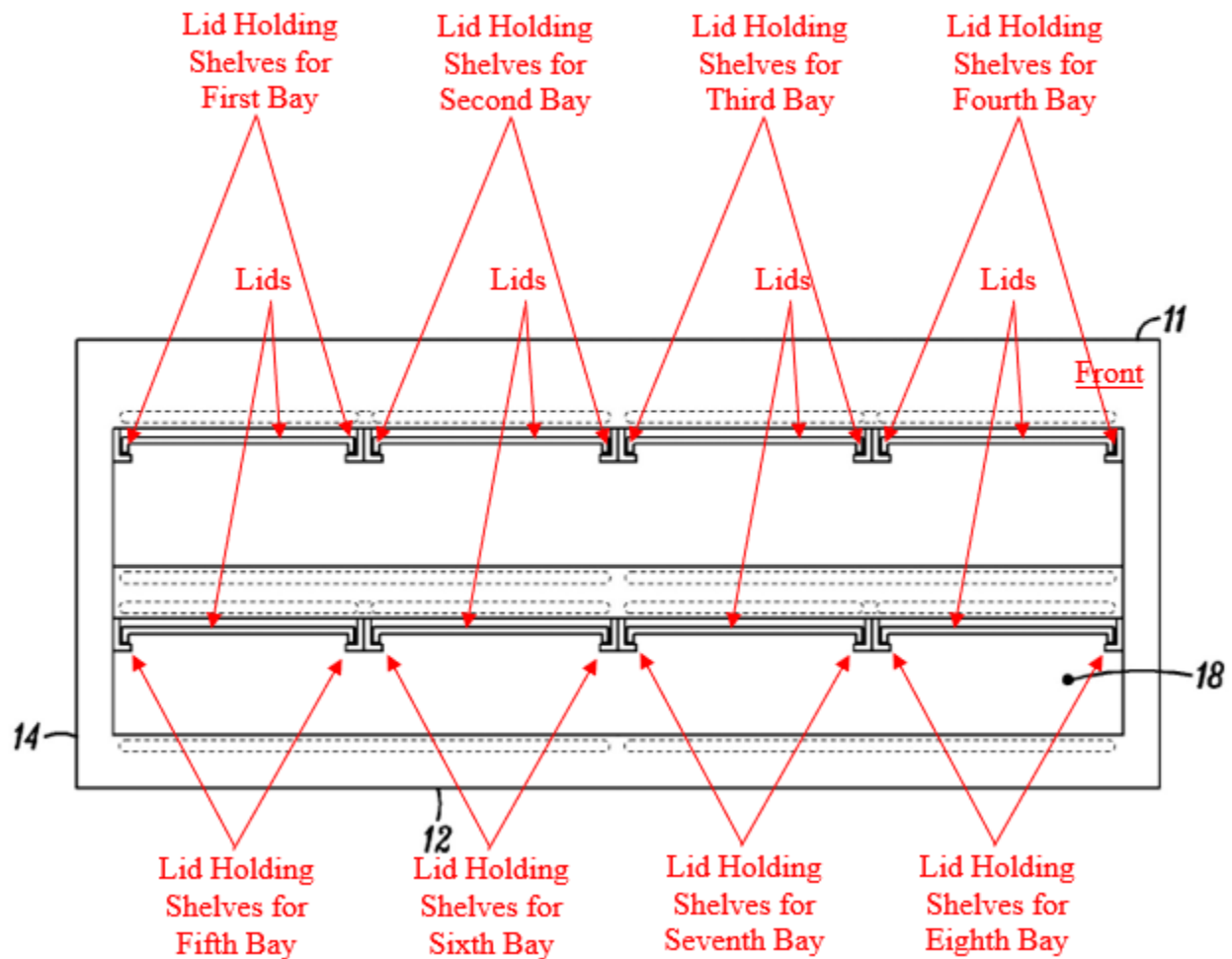


FIG. 3

EX1010.

Jones, Fortmann'197, and IRHS Documents disclose discrete lids per bay, and IRHS Documents teach lid-holding shelves for each bay, such that it would have been obvious for all bays to have lid-holding shelves receiving a lid. Section XIII(A)(7); EX1012: ¶[0072], Fig. 1B; EX1014: 4:50-53, 7:31-32, Figs. 1-4; EX1005: 8; EX1006: 1-2; EX1007: 53, 58; EX1003: ¶¶844-846. .



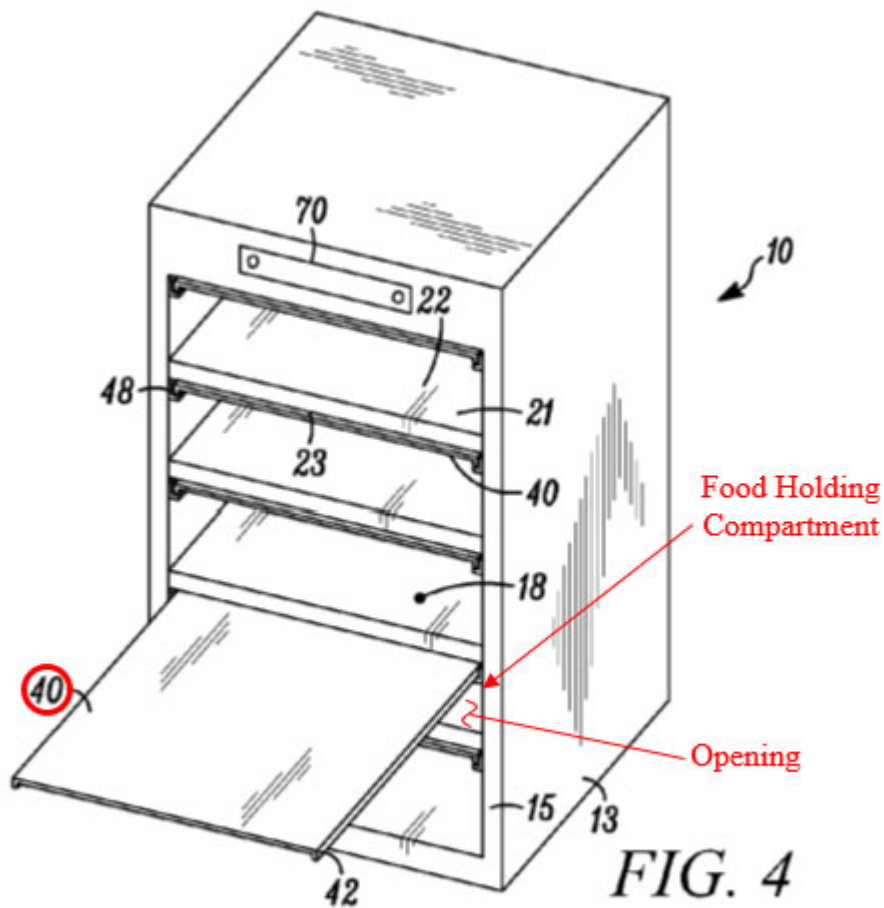
EX1010: Fig. 2 (modified).

K. Claim 10

10.a

Fortmann'748's lids (40) are insertable through openings. EX1010:

¶¶[0017]-[0018]; EX1003: ¶¶847-848.

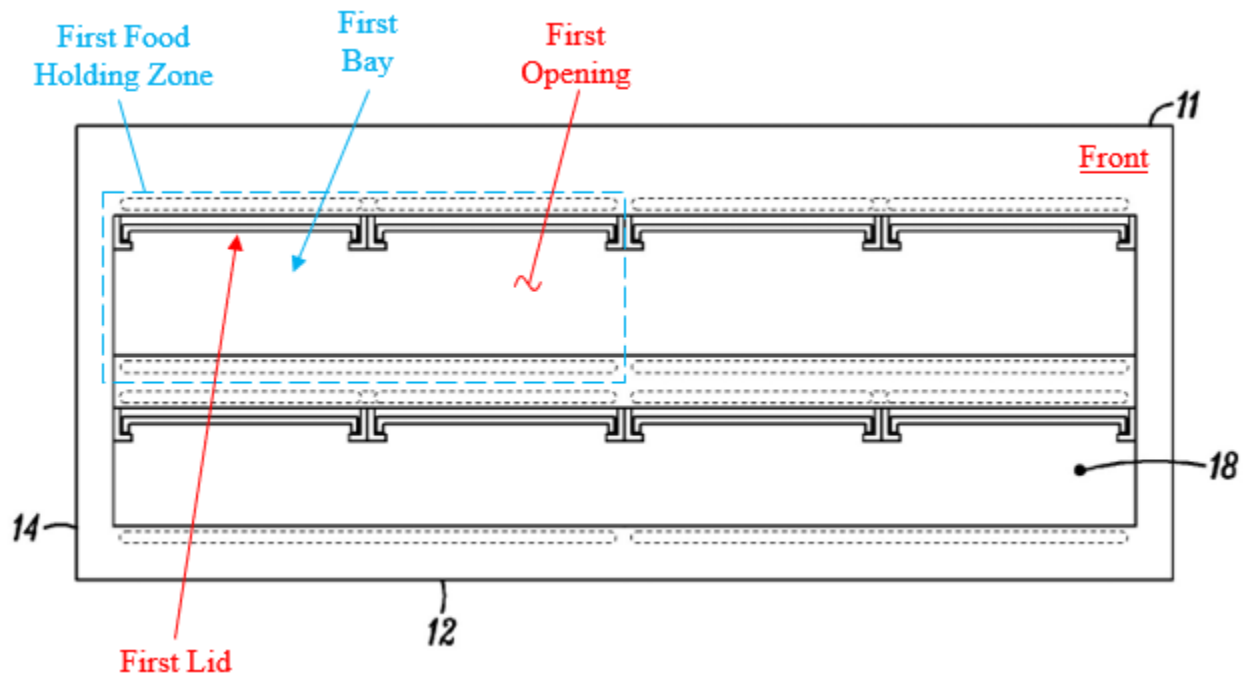


EX1010.

Per Section XIII(A)(7), Jones, Fortmann'197, and IRHS Documents disclose each bay having a discrete lid such that it would have been obvious for Fortmann'748's first bay to have a first lid. EX1012: ¶[0072], Fig. 1B; EX1014: 4:50-53, 7:31-32, Figs. 1-4; EX1005: 8; EX1006: 1-2; EX1007: 53, 58; EX1003:

¶849. Thus, it would have been obvious to receive the first lid through the first opening into the first bay of the first zone to position the lid for covering pan/tray.

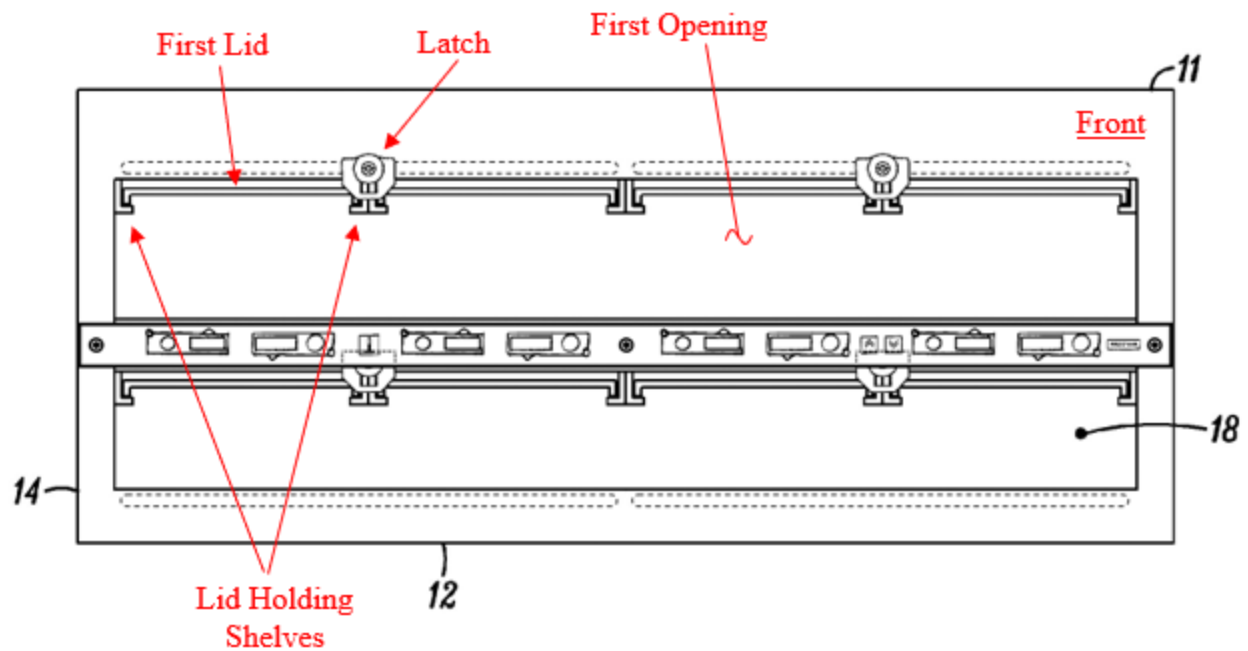
EX1010: ¶¶[0017]-[0018]; EX1003: ¶850.



EX1010: Fig. 2 (modified).

10.b

Hartfelder and Shei'099 disclose latches such that it would have been obvious to have latches for retaining the lids. Section XIII(A)(8); EX1013: ¶[0058]; EX1017: 6:9-32; EX1003: ¶¶851-854. One of the added latches (when locked) would prevent lid removal, thereby retaining the first lid within the first bay on the first bay's lid holding shelves. EX1013: ¶[0058]; EX1017: 6:19-21; EX1003: ¶¶855-858.



EX1010: Fig. 2 (modified).

L. Claim 12

Fortmann'748's tracks (48) (lid-holding shelves) downwardly depend from the top panel's (11) top surface toward the unobstructed planar surface. EX1010:

¶¶[0017]-[0018]; EX1003: ¶¶859-860.

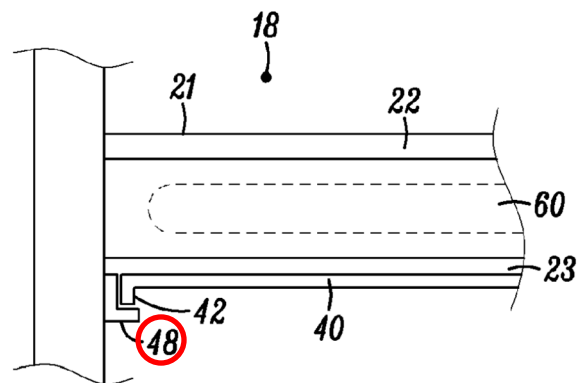
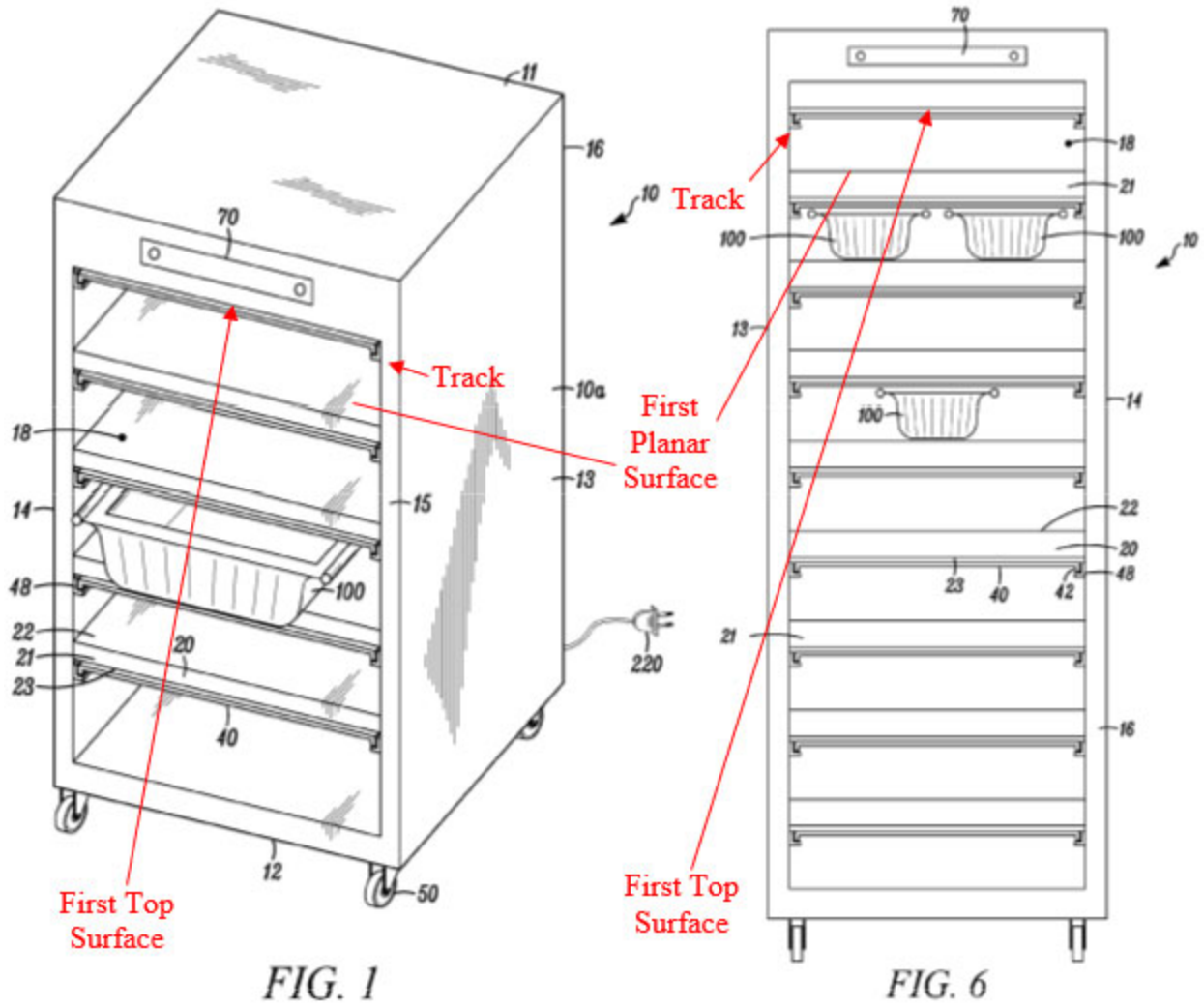


FIG. 3

EX1010.

Per Section XIII(A)(7), when modifying Fortmann'748 to have discrete lids per Jones, Fortmann'197, and IRHS Documents, it would have been obvious to fix Fortmann'748's duplicated lid-holding shelves (supporting additional lids in first compartment) to the top panel. EX1010: ¶[0018]; EX1003: ¶861. Thus, Fortmann'748 would have lid-holding shelves downwardly depending from the first top surface toward the first planar surface, leaving the first planar surface unobstructed between the side panels. Section XIII(B)(1.a.3/1.a.6/1.a.7); EX1003: ¶¶862-864.

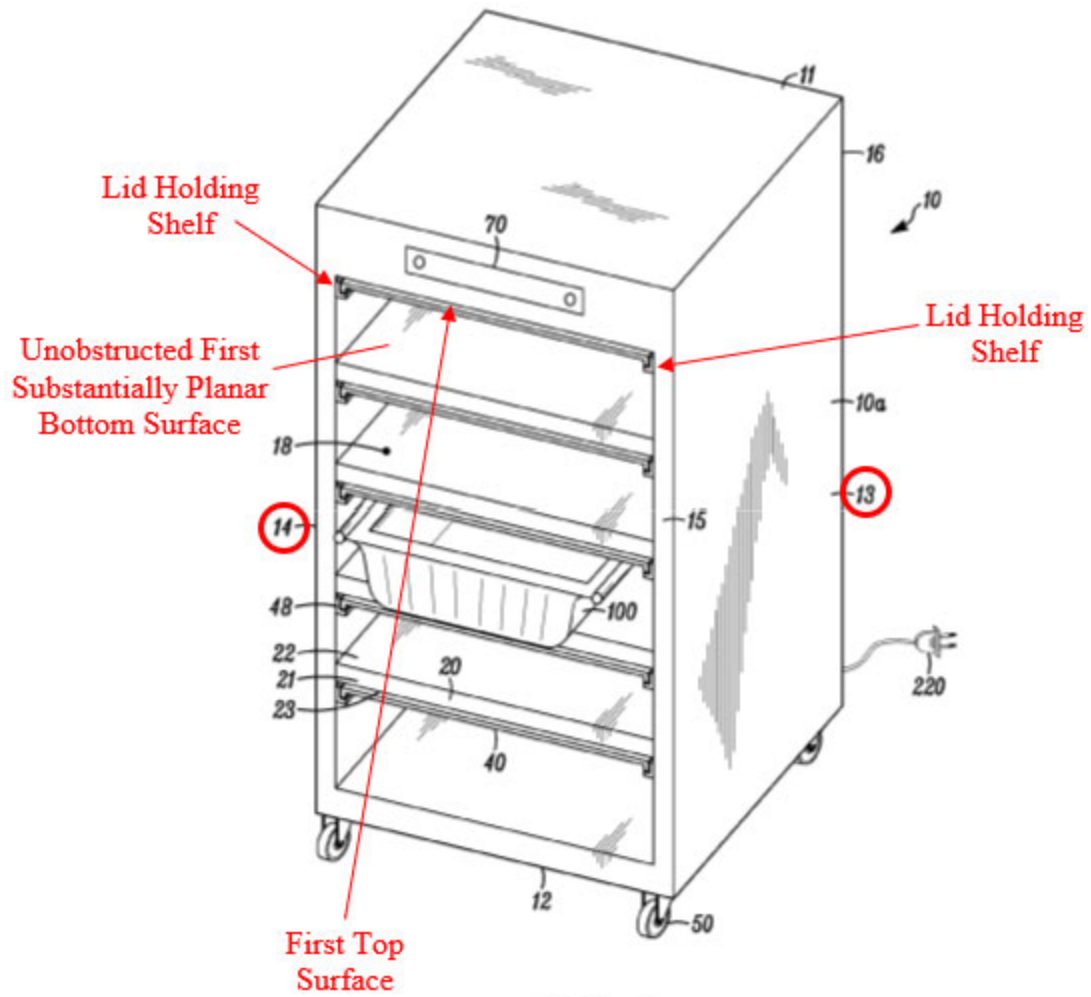
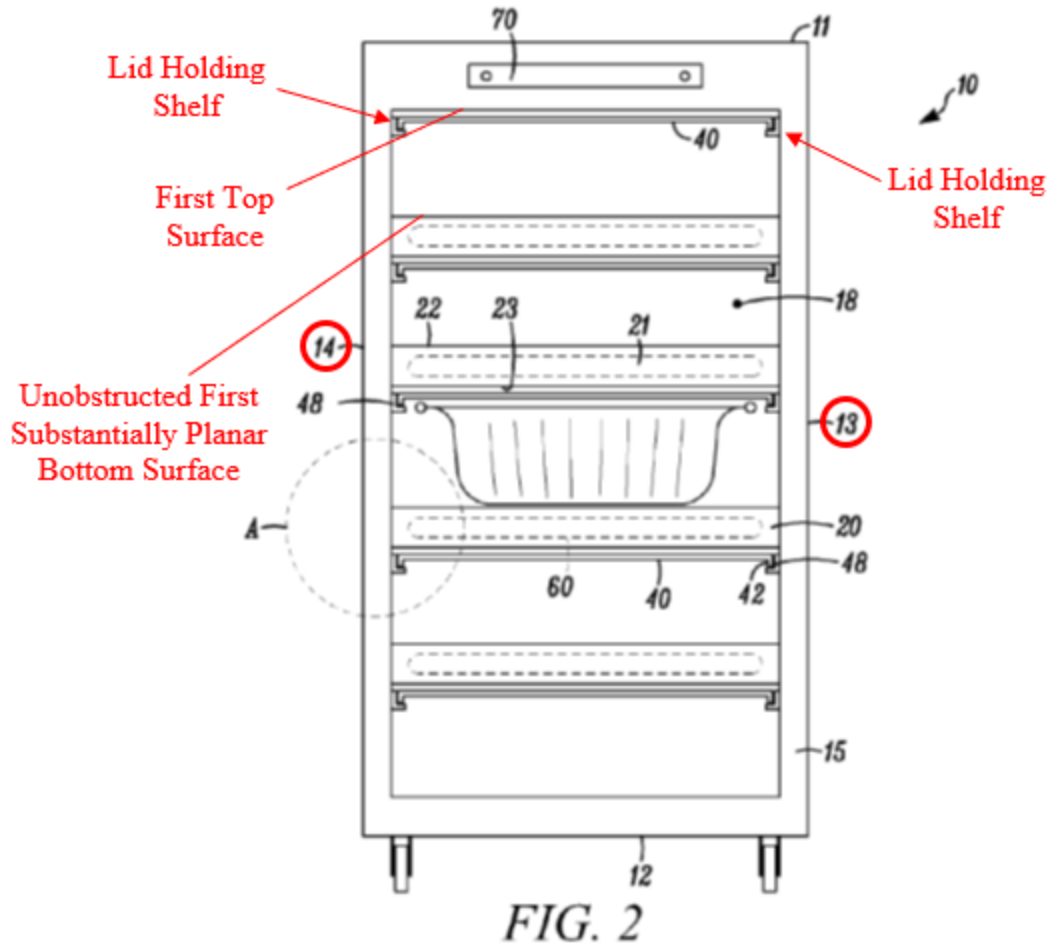
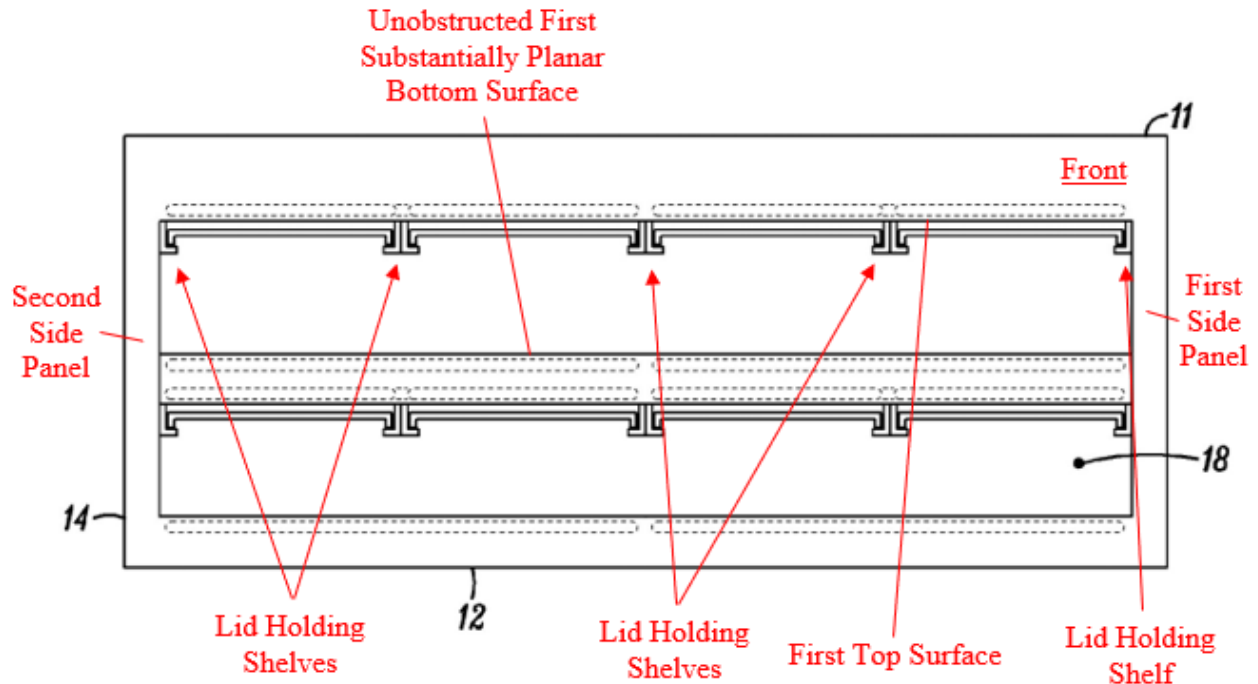


FIG. 1



EX1010.



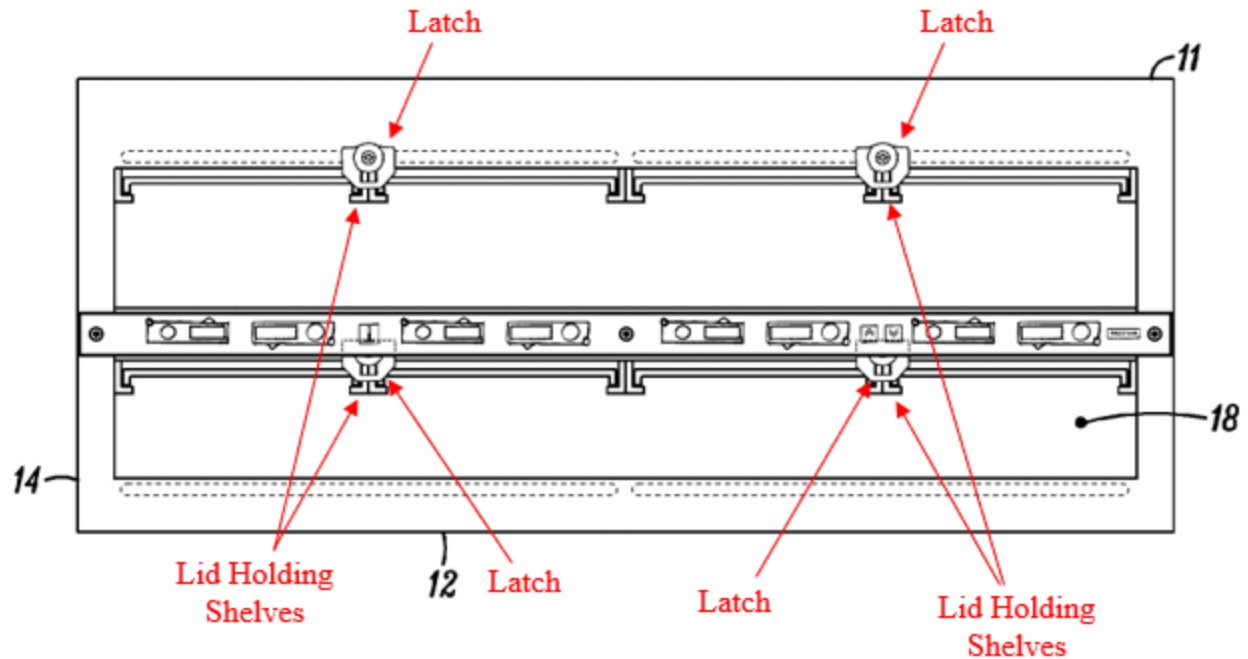
EX1010: Figs. 2 (modified).

M. Claim 13

13.a

Hartfelder and Shei'099 disclose lid-retaining latches such that it would have been obvious to modify Fortmann'748 to include latches on the front face associated with the lid holding shelves (aligned to retain lids). Section XIII(A)(8);

EX1013: ¶[0058], Figs. 1, 2, 9; EX1017: 6:9-21, Figs. 1-2; EX1003: ¶¶865-866.



EX1010: Fig. 2 (modified).

It would have been obvious to position the latches here per Hartfelder and/or Shei'099—positioned adjacent the openings and lids to engage and retain the lids (even with bezel (76)). EX1013: Figs. 1-5, 9, ¶¶0039]; EX1003: ¶¶867-868.

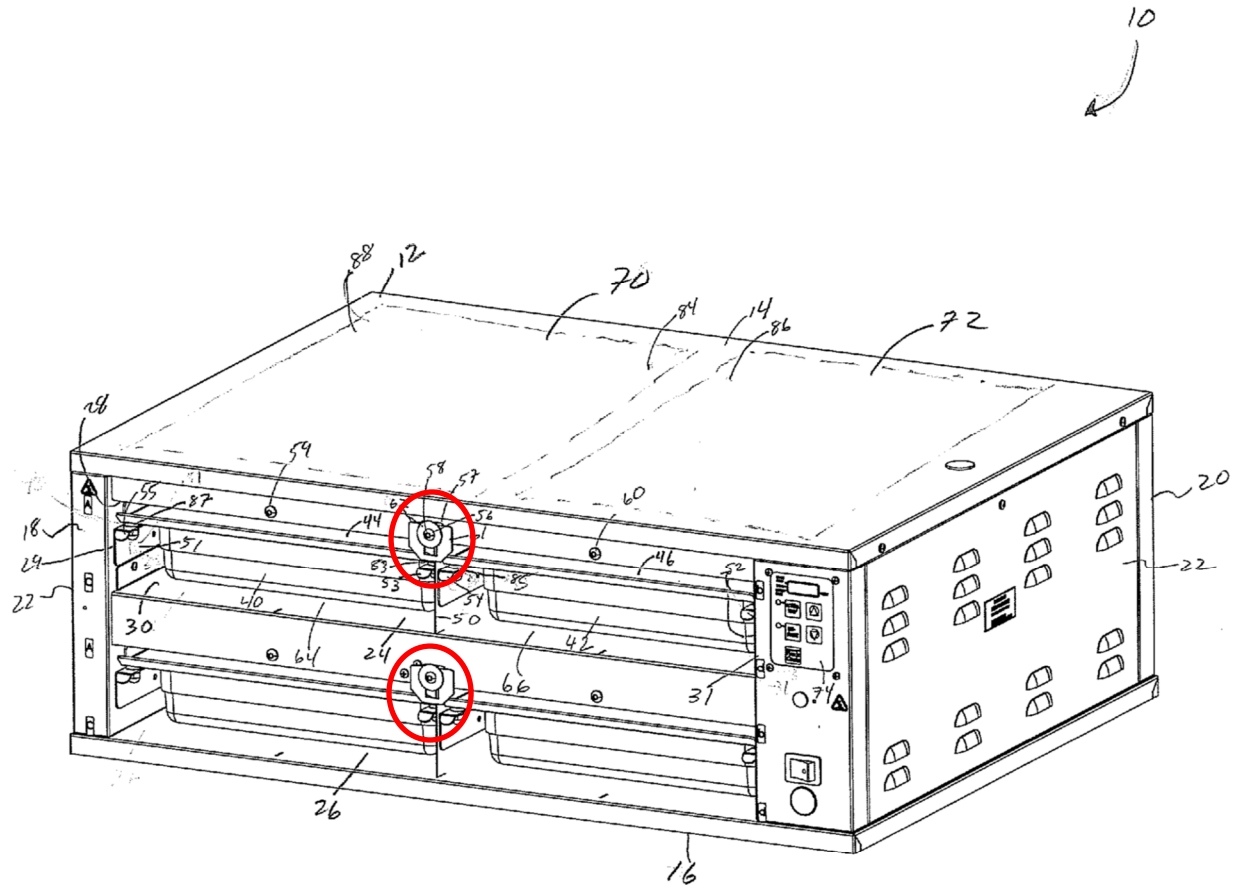
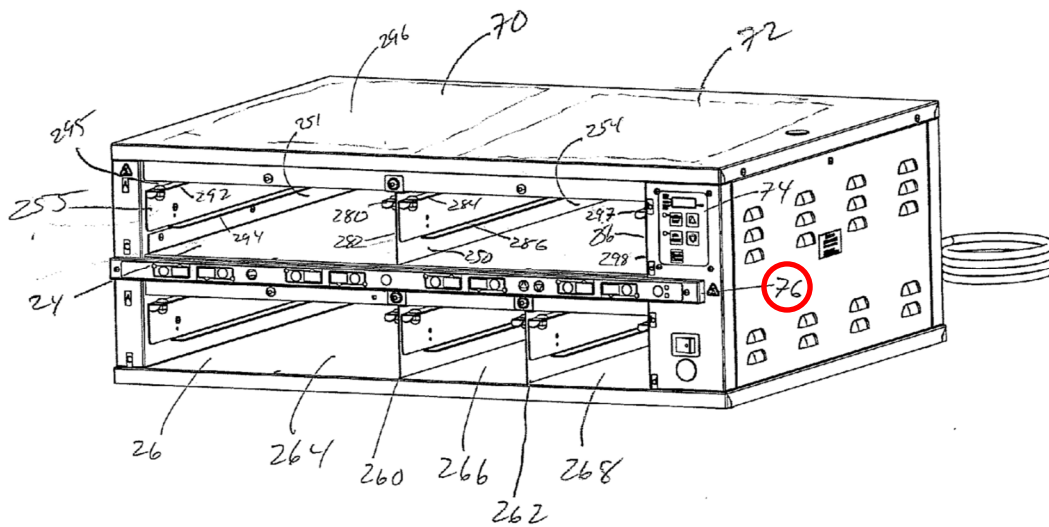


FIGURE 1



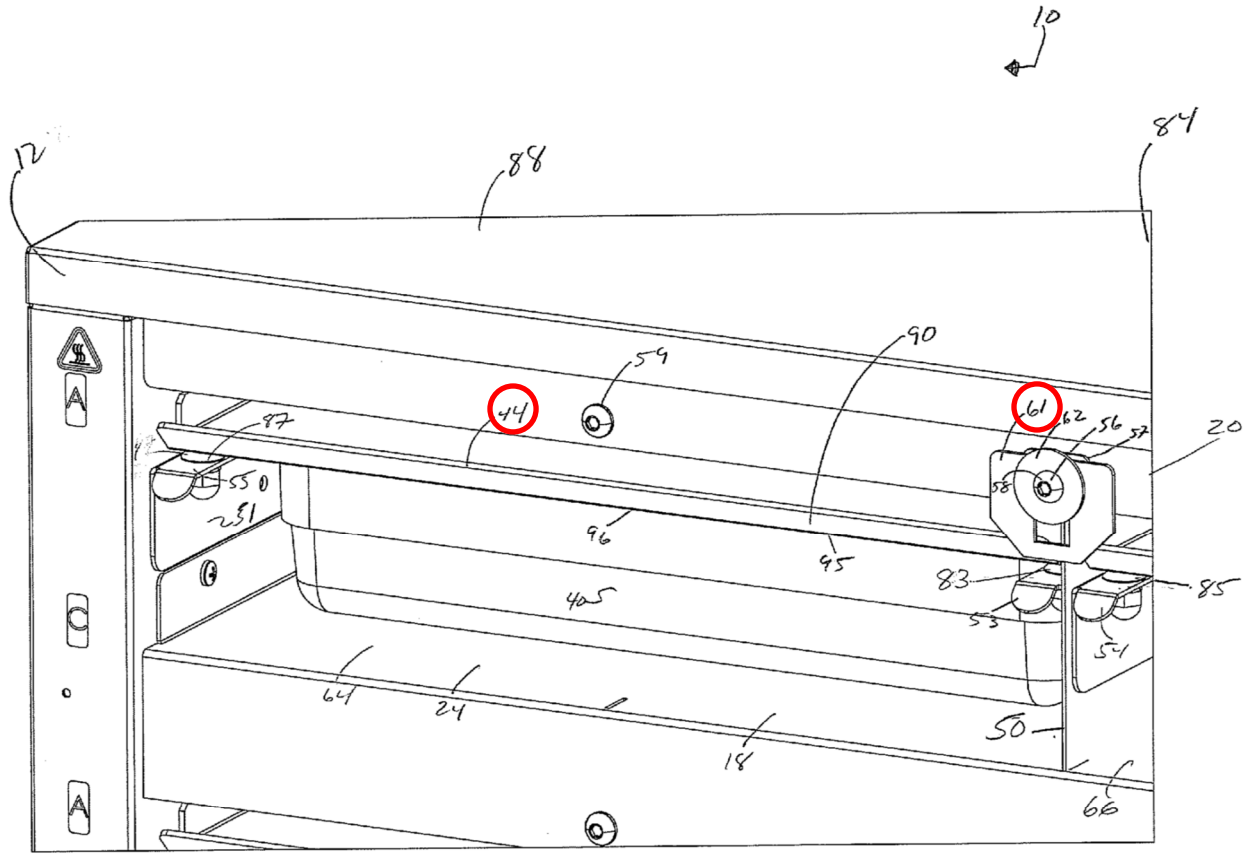
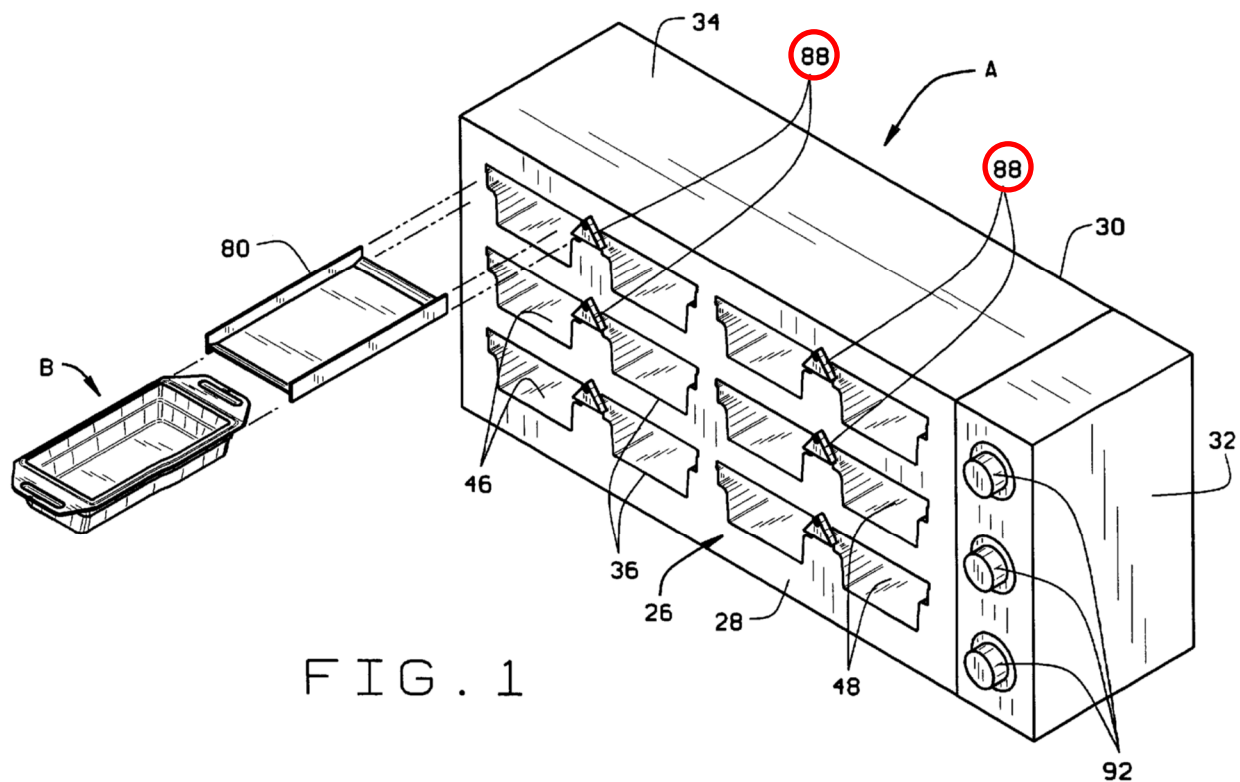


FIGURE 9

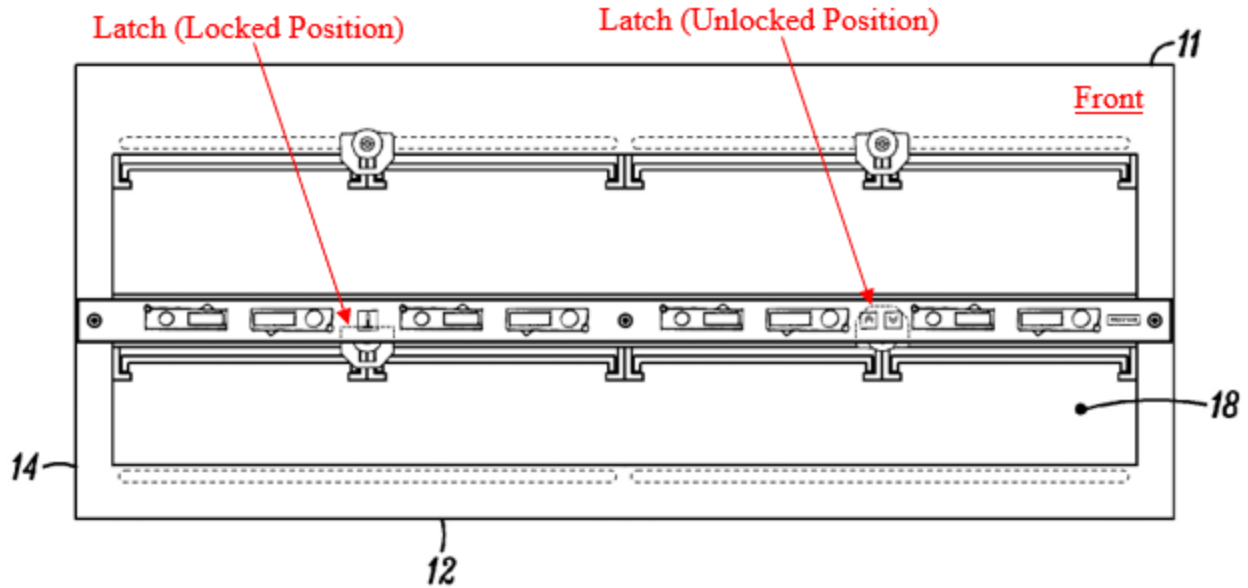
EX1013: Figs. 1, 3, 9.



EX1017.

13.b

Per Section XIII(A)(8), the added latches would be moveably secured to Fortmann'748's front face. EX1013: Fig. 2; EX1017: 6:9-32; EX1003: ¶¶869-874.

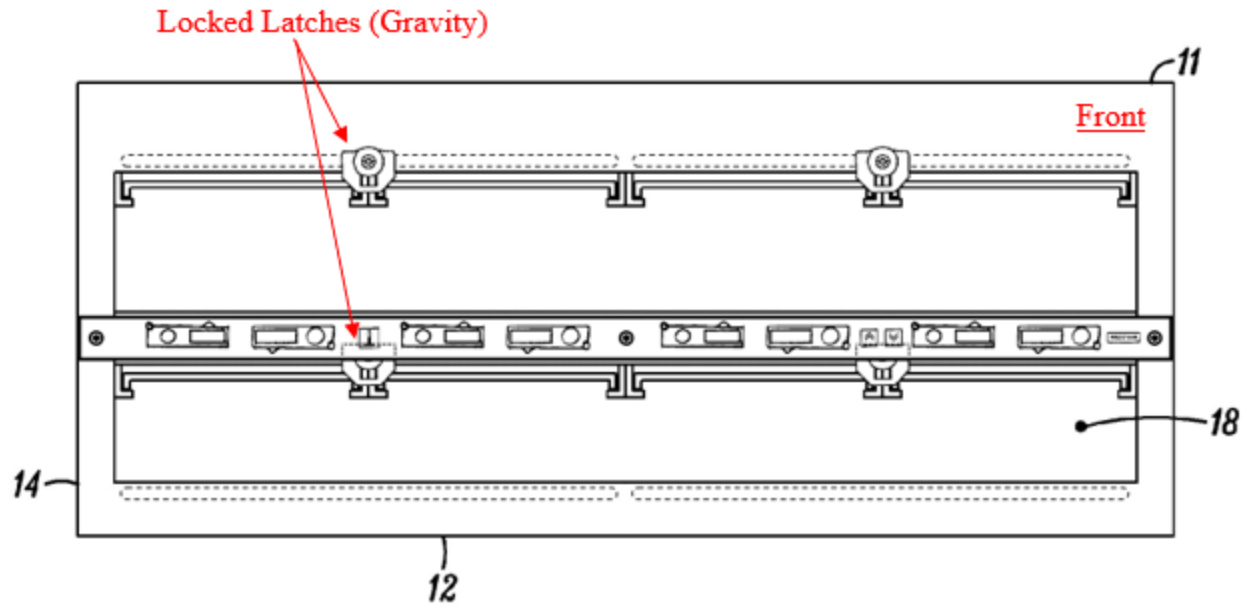


EX1010: Fig. 2 (modified).

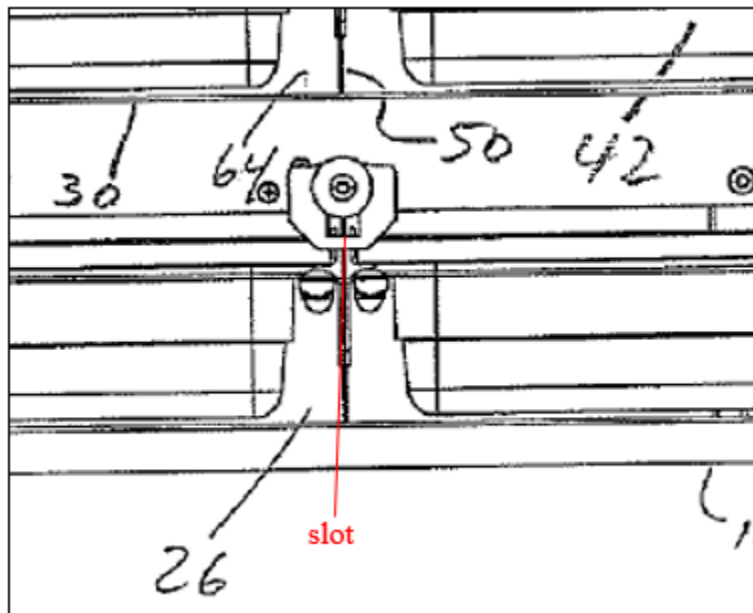
N. Claim 14

Per Section XIII(A)(8), Hartfelder, and/or Shei'099, the added latch would be gravity-biased (latch's center of gravity below fastener) into the locked position (retaining lid on lid holding shelf). EX1013: Figs. 2, 9; EX1017: 6:29-32;

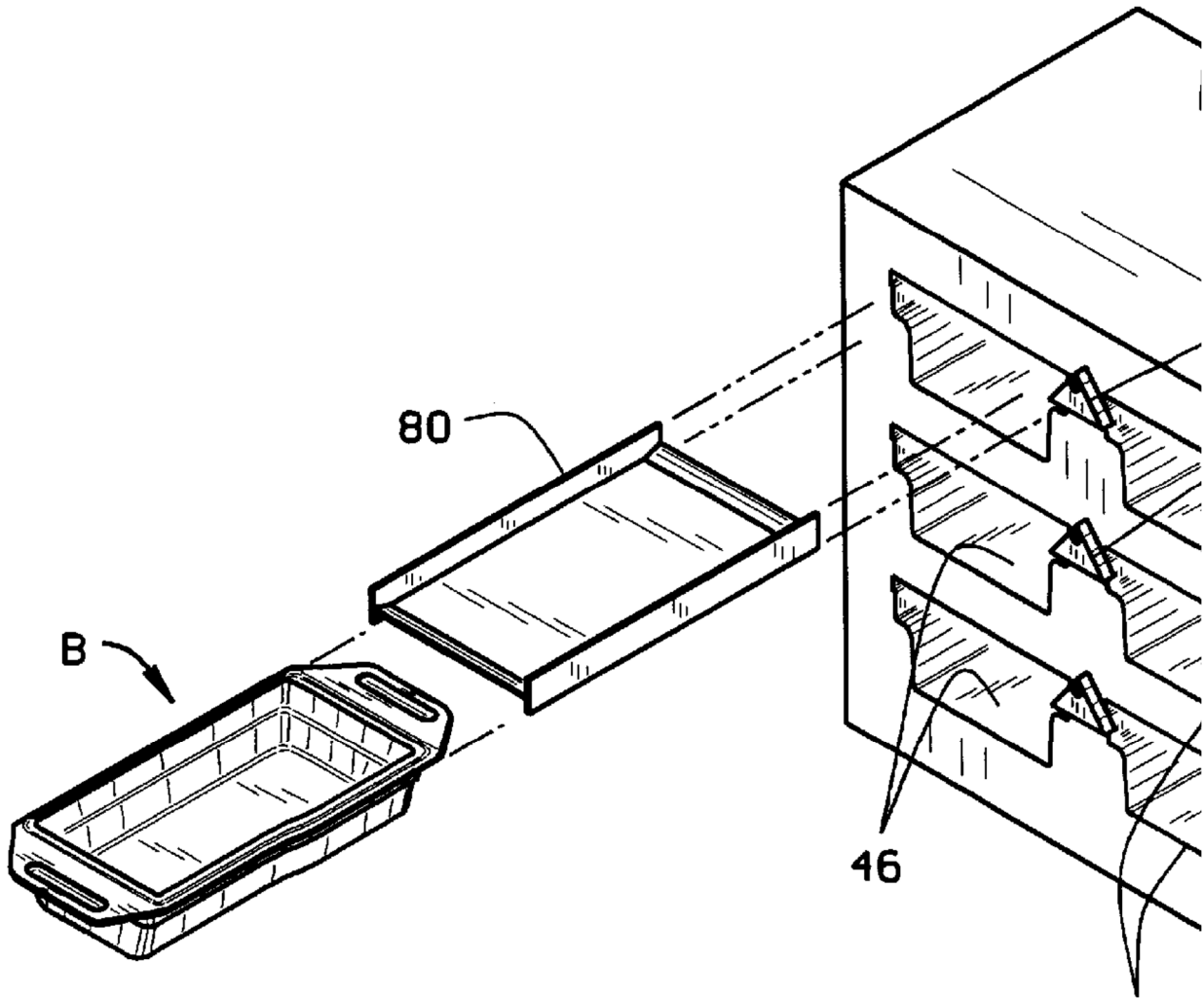
EX1016: ¶[0043], Fig. 1; EX1003: ¶¶875-878.



EX1010: Fig. 2 (modified).



EX1013: Fig. 2 (enlarged).



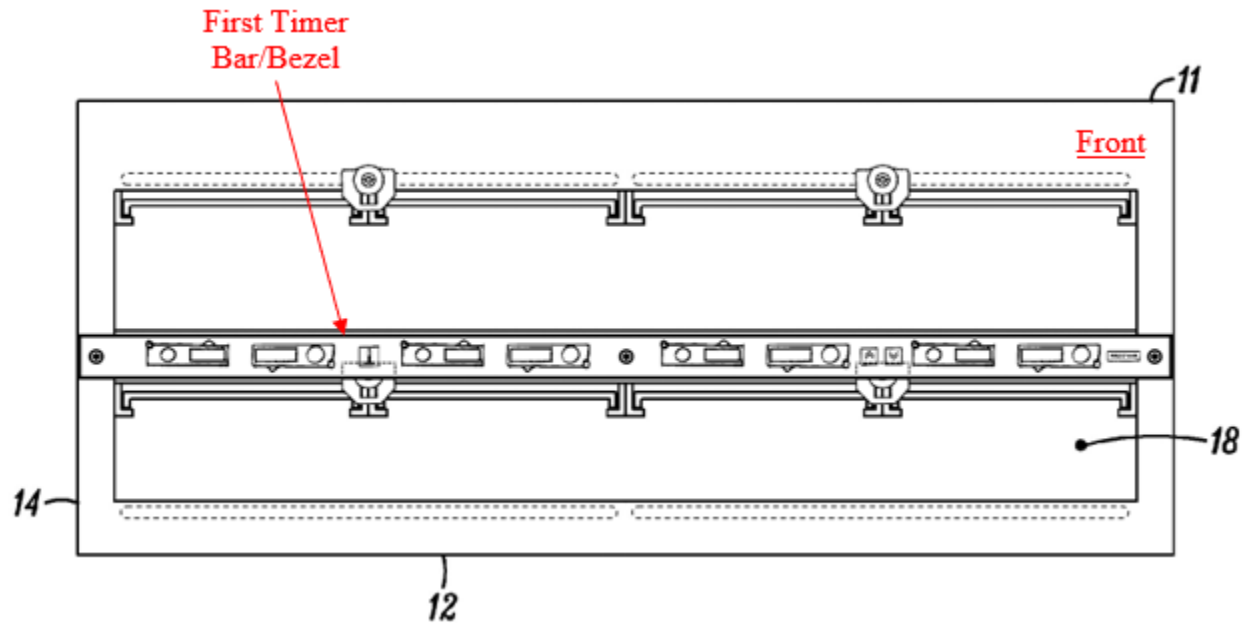
EX1017: Fig. 1 (enlarged).

O. Claim 15

15.a

Per Section XIII(A)(6), Fortmann'197, IRHS Documents, and Hartfelder disclose timer bars/bezels spaced forward of a front face/shelf such that it would have been obvious for Fortmann'748 to have a front timer bar/bezel spaced forward of the front face to define a gap between the front timer bar/bezel and the

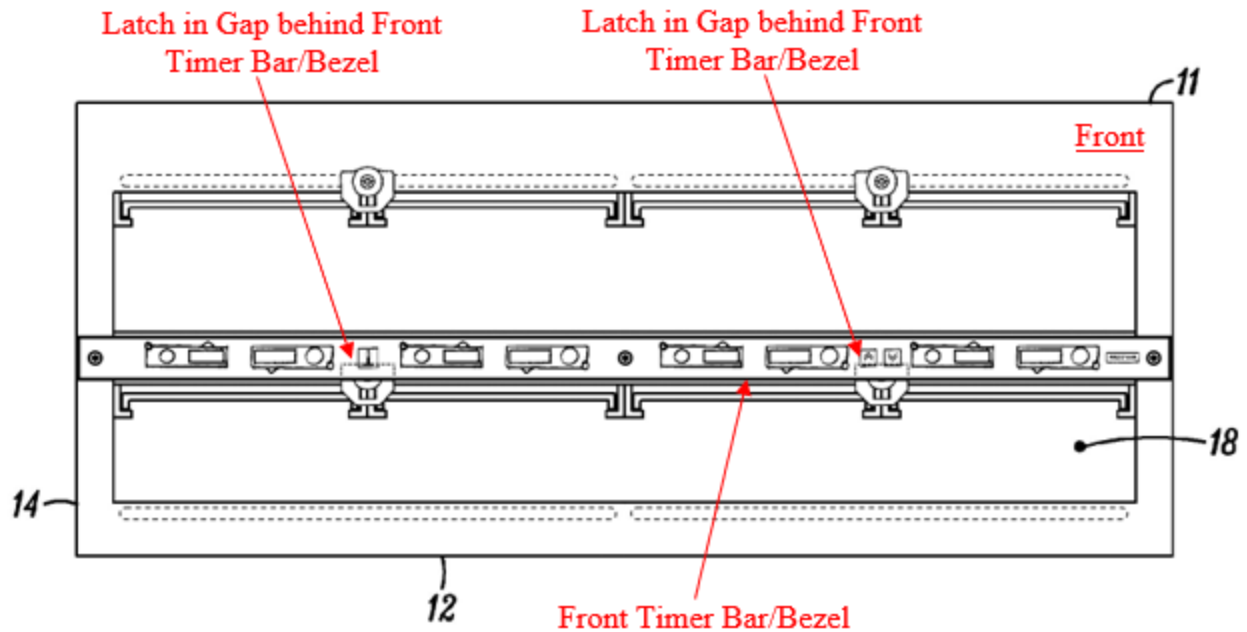
front face. EX1005: 8, 19; EX1014: 2:58-59, 3:28-30, 3:55-56, 4:18-37, Figs. 1-3 and 5; EX1013: Figs. 3, 4, 9; EX1003: ¶¶879-882.



EX1010: Fig. 2 (modified).

15.b

Per Section XIII(A)(8), Hartfelder, and/or Shei'099, the latches would be in the gap. EX1003: ¶¶883-884.



EX1010: Fig. 2 (modified).

It would have been obvious to position the latches here per Hartfelder and/or Shei'099—positioned adjacent the openings and lids, and thus to engage and retain the lids (even with bezel (76)). EX1013: Figs. 1-5, 9, ¶[0039]; EX1003: ¶885.

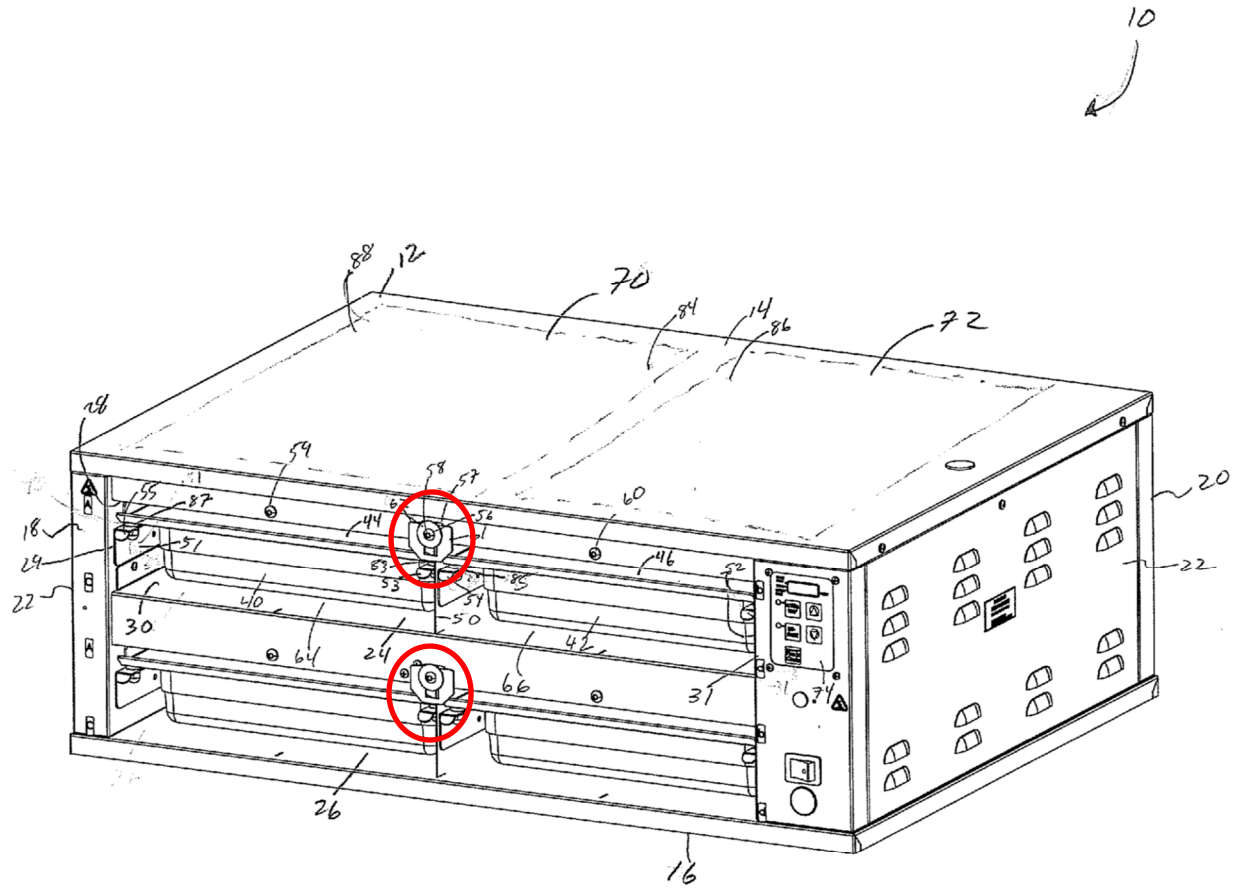
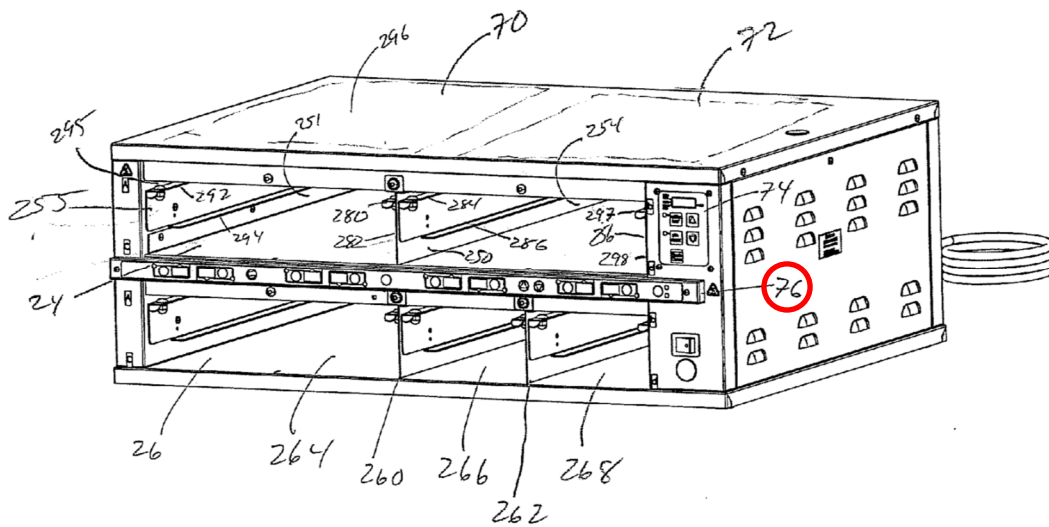


FIGURE 1



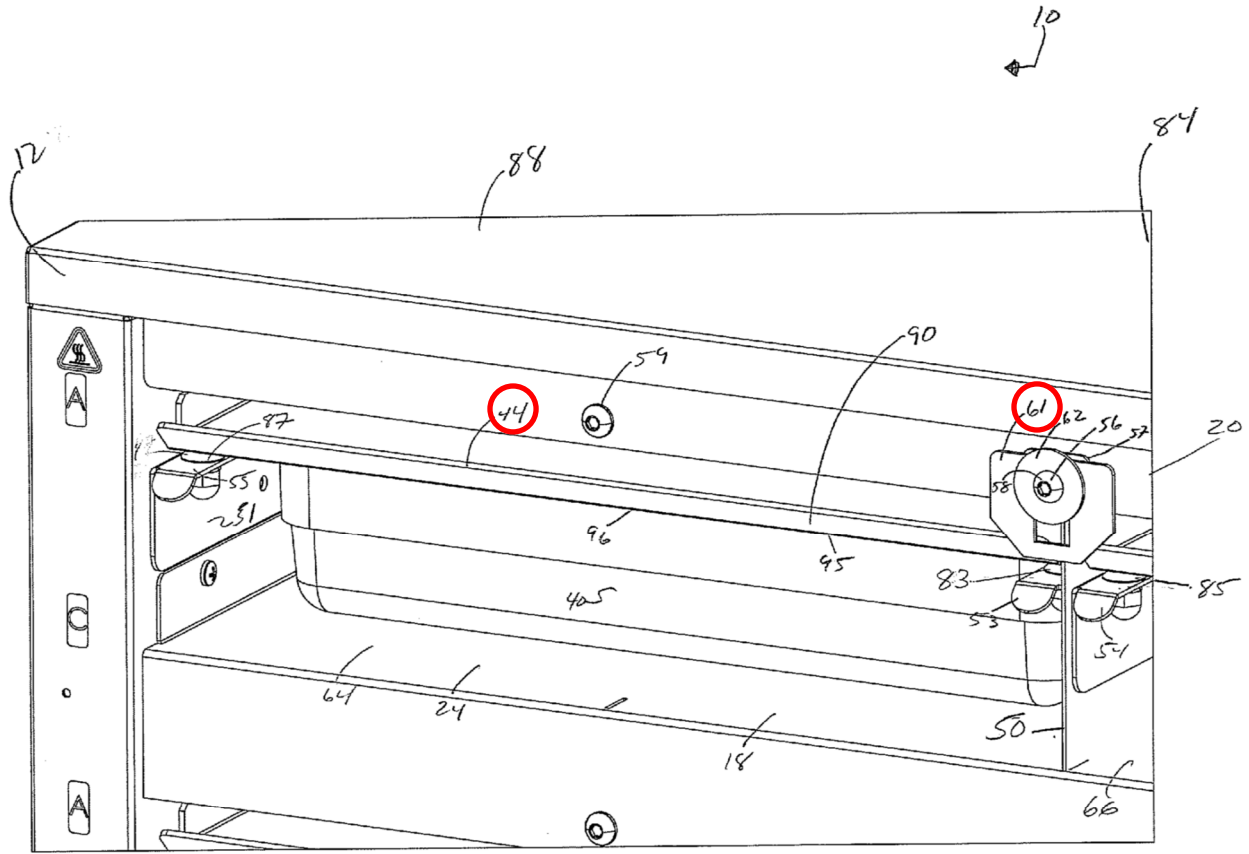


FIGURE 9

EX1013: Figs. 1, 3, 9.

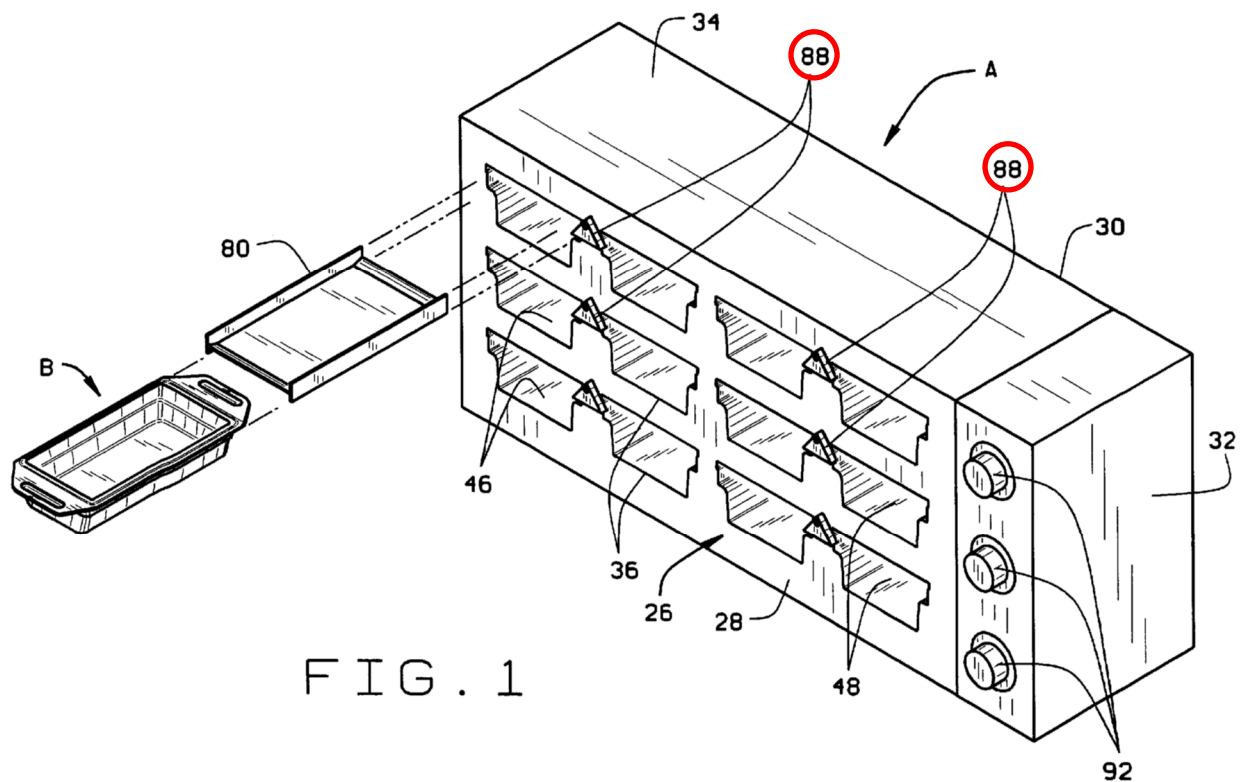
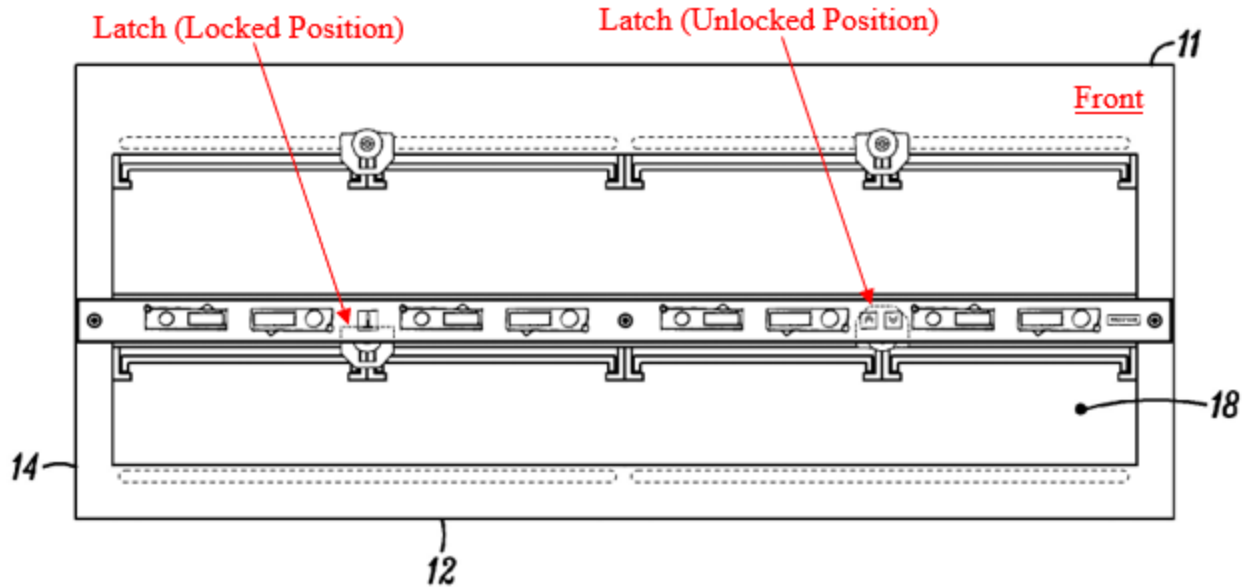


FIG. 1

EX1017.

Per Section XIII(A)(8)), the latches would be moveable/rotatable between locked and unlocked positions such that the lower latches would move within the gap. EX1013: Fig. 2; EX1017: 6:9-32; EX1016: ¶[0043], Fig. 1; EX1003: ¶¶886-887.



EX1010: Fig. 2 (modified).

P. Claim 16

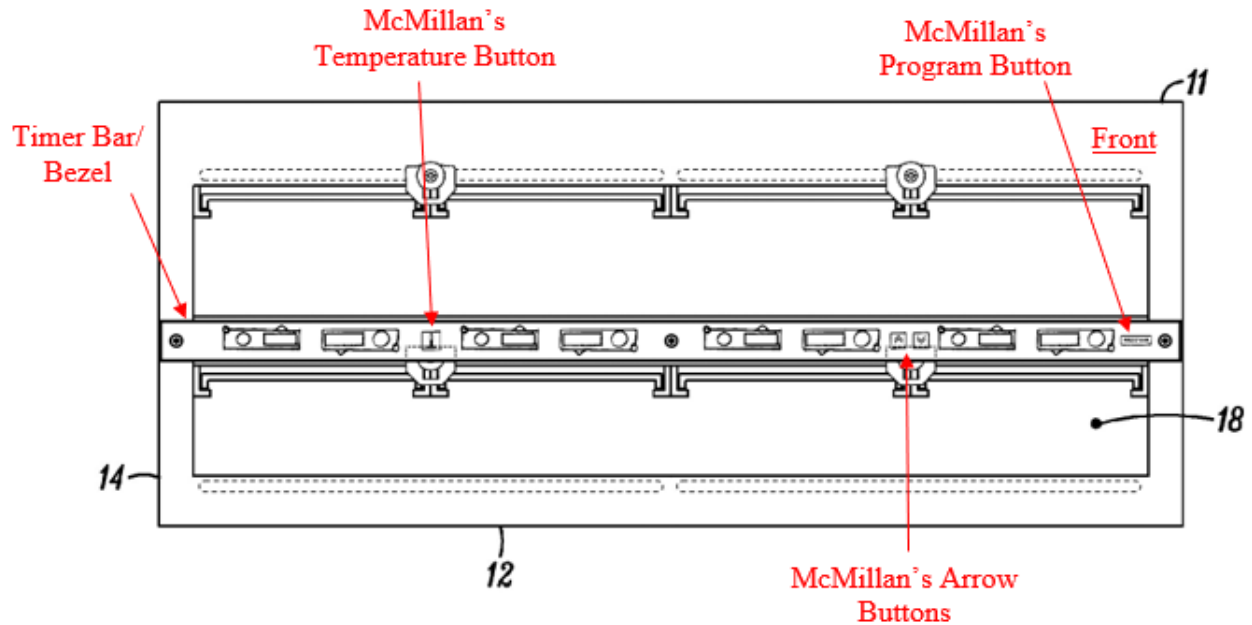
Fortmann’748’s generic input device “select[s] the desired [zone] temperature.” EX1010: ¶[0027]; EX1003: ¶¶888-889.

Per Vaseloff, it would have been obvious to incorporate Vaseloff’s display/control groups (user interface) for each bay. Section XIII(A)(4); EX1003: ¶¶890, 892.

Per McMillan (setting/controlling zone temperatures), it would have been obvious to incorporate McMillan’s buttons (user interface) to set/control each zone’s temperature. Section XIII(A)(5); EX1019: 10:43-58; EX1003: ¶¶891-892.

Therefore, it would have been obvious for Fortmann’748 to have Vaseloff’s display/control groups and McMillan’s controls and to receive user input of temperature setpoints (first temperature setpoint) via McMillan’s controls to

change the setpoint temperatures (first temperature setpoint) of the zones (first zone). EX1010: ¶[0027]; EX1003: ¶¶893-894.



EX1010: Fig. 2 (modified).

Q. Claim 17

Jones has temperature settings assigned to and following food product names—the user sets the name, and the heating elements are operated according to the set name's temperature settings. EX1012: ¶¶[0097]-[0098], [0112]-[0115]; EX1003: ¶¶895-900.

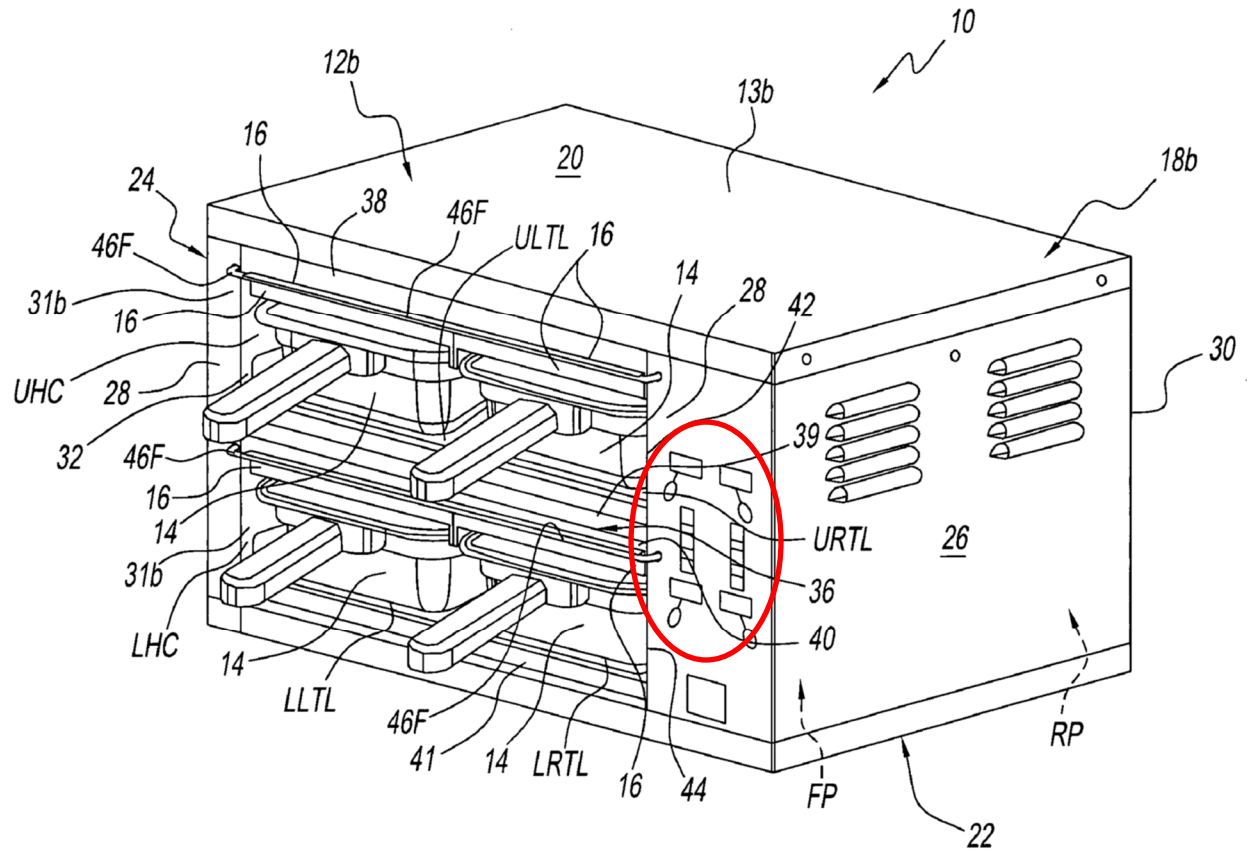


Fig. 1B

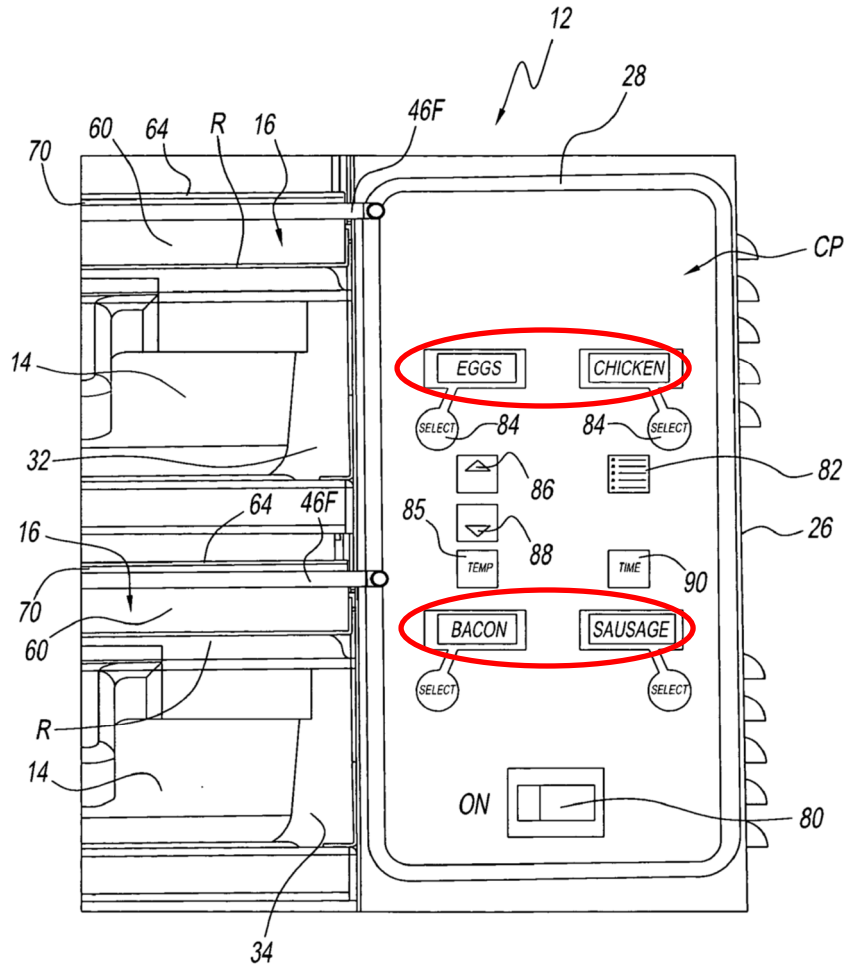


Fig. 17

EX1012.

Per Jones, it would have been obvious to modify Fortmann'748 to include the ability to set temperature setpoints by assigning food product names to each bay. EX1003: ¶901. This would provide an easy, fast, and intuitive way for a user to change setpoint temperatures by simply changing the assigned food product name. EX1012: ¶¶[0112]-[0115]; EX1016: ¶[0060]; EX1003: ¶902. This also allows the user to change food product names, and thereby the holding

temperatures, in real time (e.g., temporary, small-scale change) to accommodate real time changes in held food types. EX1003: ¶903. This would also allow changing the food product name displayed and the temperature settings together, instead of separately, making it easier and faster to change the unit's configuration. EX1016: ¶[0060], ¶[0080]; EX1003: ¶904.

This modification is compatible with adding McMillan's controls (to change temperature setpoints associated with food product names). EX1012: ¶¶[0097], [0124]-[0125]; EX1003: ¶905.

Vaseloff's added display devices already display food names. EX1026: 4:5-15; EX1003: ¶907. POSA would program Fortmann'748's controller and McMillan's controls to change the name for bays via McMillan's arrow and program buttons. EX1012: ¶¶[0097], [0112]-[0115], [0124]-[0125]; EX1019: 6:15-19, 10:43-58; EX1003: ¶¶906, 908, 911.

This applies a known technique (associating temperature setpoints with food product names per Jones) to improve a similar device (Fortmann'748) in the same way (change food product names to change temperature setpoints) with a reasonable expectation of success (use of Vaseloff's display/control groups and McMillan's controls, and Jones demonstrating possibility). EX1012: ¶¶[0097], [0112]-[0115], [0124]-[0125]; EX1003: ¶¶909-910.

Thus, per Jones, it would have been obvious for the received user input to be a selection of a food item for the first zone, the selection associated with operation and control of the first and second heaters. EX1003: ¶¶912. For example, the user would select via McMillan's buttons (program/arrow buttons) the food name for the first zone (displayed in Vaseloff's display device for first zone), and Fortmann'748's controller would independently operate and control the first and second heaters based on the setpoint temperature associated with the selected name. EX1003: ¶¶913-914.

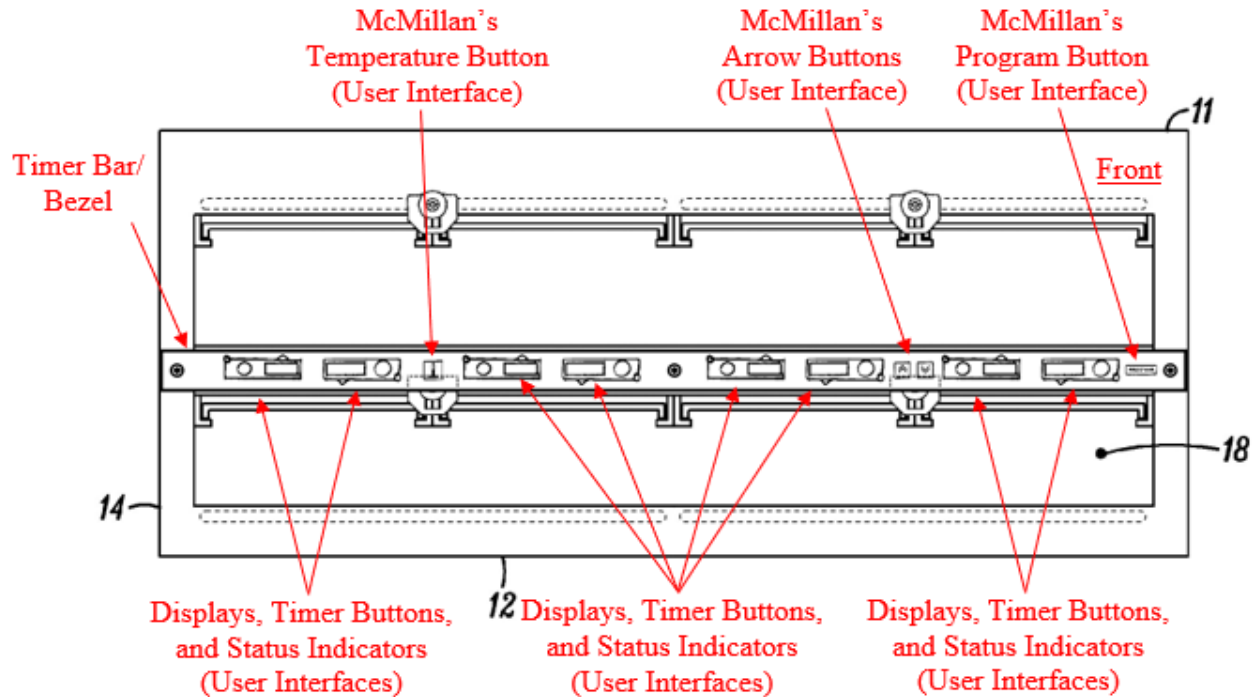
R. Claim 20

20.a

Per Sections XIII(A)(4)-(5)), Vaseloff and McMillan disclose displays and controls (user interfaces) such that user interfaces would have been obvious to include in Fortmann'748. EX1026: 4:5-6, 4:20-22, 4:26-33, 4:48-49, 6:51-52; EX1019: 4:36-52; EX1003: ¶¶915-917.

Per Section XIII(A)(6), Fortmann'197, IRHS Documents, and Hartfelder each disclose a timer bar/bezel (with user interfaces) set forward of a front face/shelf such that it would have been obvious to add a timer bar/bezel set forward of the front face/shelf to Fortmann'748 and to include the displays and controls (user interface(s)) of Vaseloff and McMillan in the timer bar/bezel.

EX1005: 8, 19; EX1014: 2:58-59, 3:28-30, 3:55-56, 4:18-37, Figs. 1-3, 5; EX1013: Figs. 3, 4, 9; EX1003: ¶918.



EX1010: Fig. 2 (modified).

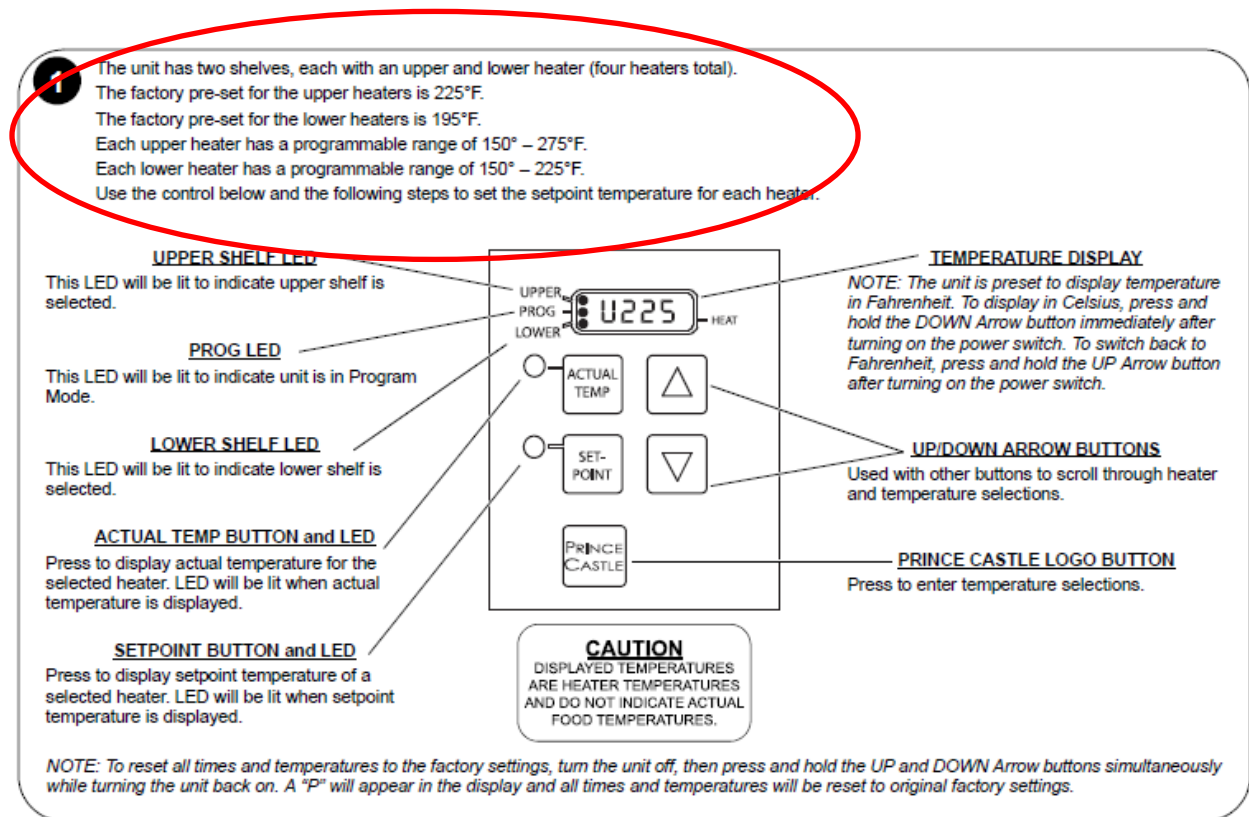
20.b

Per Section XIII(A)(5), it would have been obvious for Fortmann'748 to adopt McMillan's controls (temperature, program, and arrow buttons) for changing the setpoint temperatures. EX1019: 10:43-58; EX1003: ¶¶919-921.

Accordingly, it would have been obvious for Fortmann'748 to have McMillan's controls (user interface) and to operate these controls to receive the user input of temperature setpoints (first temperature setpoint) to change the setpoint temperatures of the zones (first zone), per Section XIII(P). EX1010: ¶[0027]; EX1003: ¶¶922-923.

XIV. GROUND 11: Claim 18 is Obvious Over Fortmann’748, IRHS Documents, Jones, Fortmann’197, McMillan, Vaseloff, Hartfelder, Shei’099, Stanger, Loy, Veltrop, and/or Prince Castle

Prince Castle teaches default presets 225°F for upper heaters (275°F maximum) and 195°F for lower heaters (225°F maximum). EX1009: 22, 40; EX1003: ¶¶924, 928.



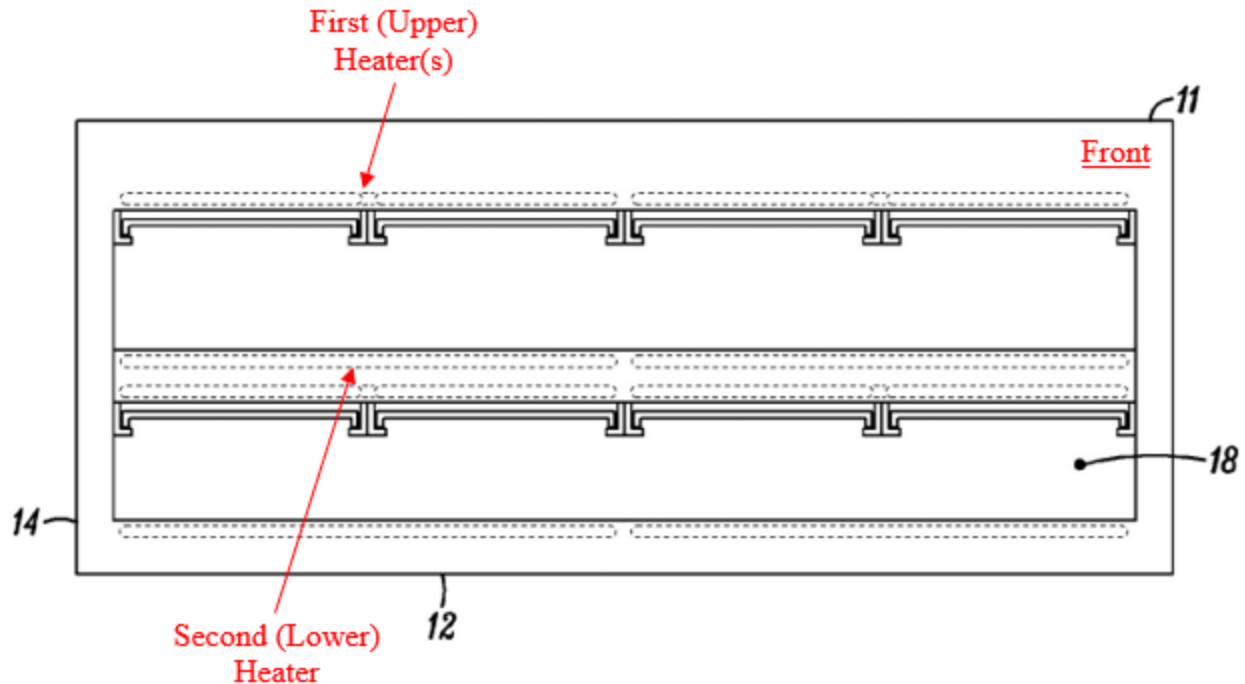
EX1009: 40.

Per Prince Castle, it would have been obvious to have each upper (first) heater of modified Fortmann’748 output more heat energy than the respective lower (second) heater (via higher setpoint temperature, maximum temperature setting, and/or wattage rating). EX1003: ¶¶929. Because upper and lower heaters

of each zone are independently controllable and prior art taught to customize upper and lower heating per food product (Section XIII(A)(3)), having (e.g., setting) the upper elements to output more heat energy than lower elements would be an obvious design choice (evidenced by Prince Castle) from limited solutions (upper heat greater than, equal to, or less than lower heat). *Uber Techs., Inc. v. X One, Inc.*, 957 F.3d 1334, 1341 (Fed. Cir. 2020); EX1009: 22, 40; EX1003: ¶¶925-927.

POSA would have the upper heaters output more heat energy than the lower heaters to overcome distance between upper heaters and food, counteract evaporative cooling, maintain food surface temperature and texture, compensate for upper heat radiating in all directions, and/or “to re-crisp breaded (fried) food, to melt cheese ..., to brown [] food products.” EX1027: ¶[0021]; EX1006: 1. This helps “provide optimum environment” and “minimize temperature distribution from top to bottom.” EX1006: 1; EX1007: 10, 51; EX1003: ¶¶930-935.

This applies a known technique (upper heaters outputting more heat than lower heaters) to improve a similar device (Fortmann’748) in the same way (upper heaters higher setpoint temperatures) with reasonable expectation of success (heaters operate independently). Section XIII(A)(3); EX1003: ¶¶936-938.



EX1010: Fig. 2 (modified).

XV. GROUND 12: Claims 11 and 19 are Obvious Over Fortmann'748, IRHS Documents, Jones, Fortmann'197, McMillan, Vaseloff, Hartfelder, Shei'099, Stanger, Loy, Veltrop, and/or Merco

A. Claim 11

11.a

Per Sections XIII(A)(7), XIII(B)(1.a.4/1.a.8), XIII(B)(1.b/1.c./1.d/1.e), XIII(F), XIII(I), it would have been obvious to receive a first pan/tray of a first food type (e.g., non-fried food) through the first opening into the first zone's first bay onto the first planar surface under the lid to heat the food and maintain moisture. EX1010: ¶[0002]; EX1013: ¶[0006]; EX1003: ¶¶939-942.

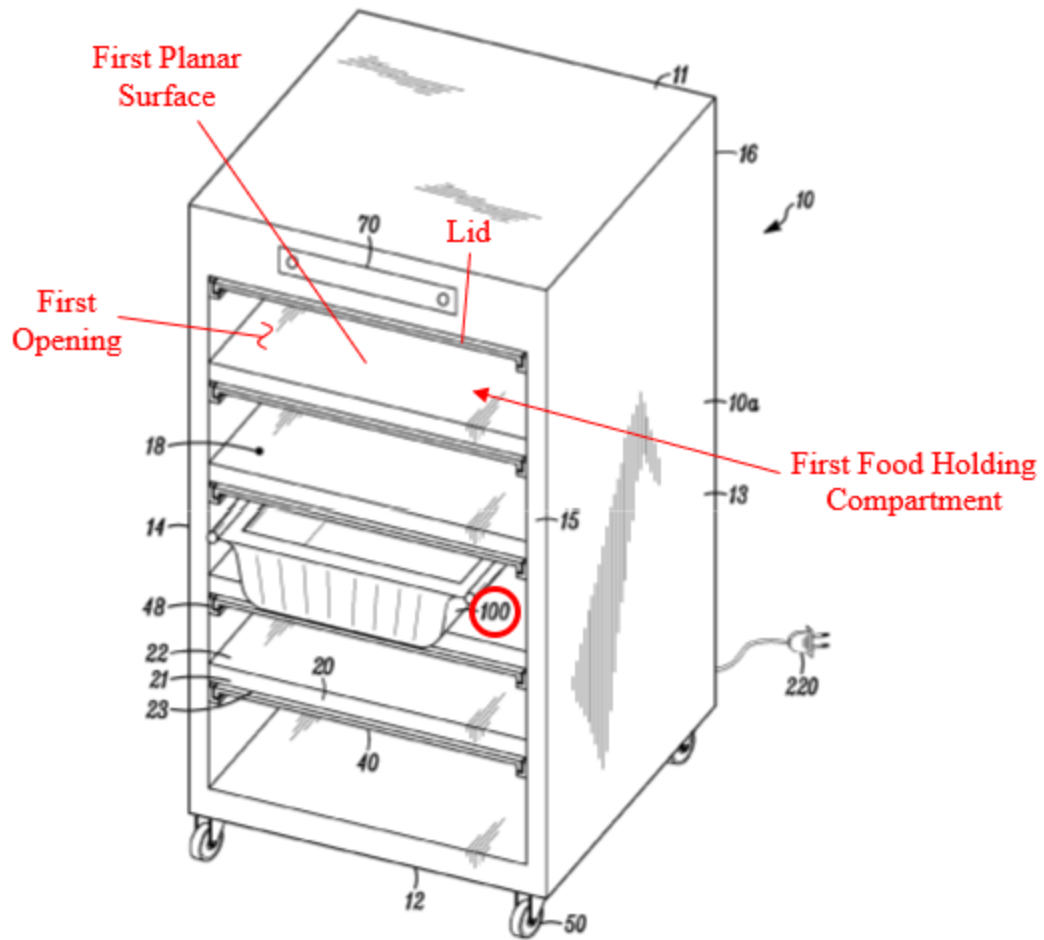
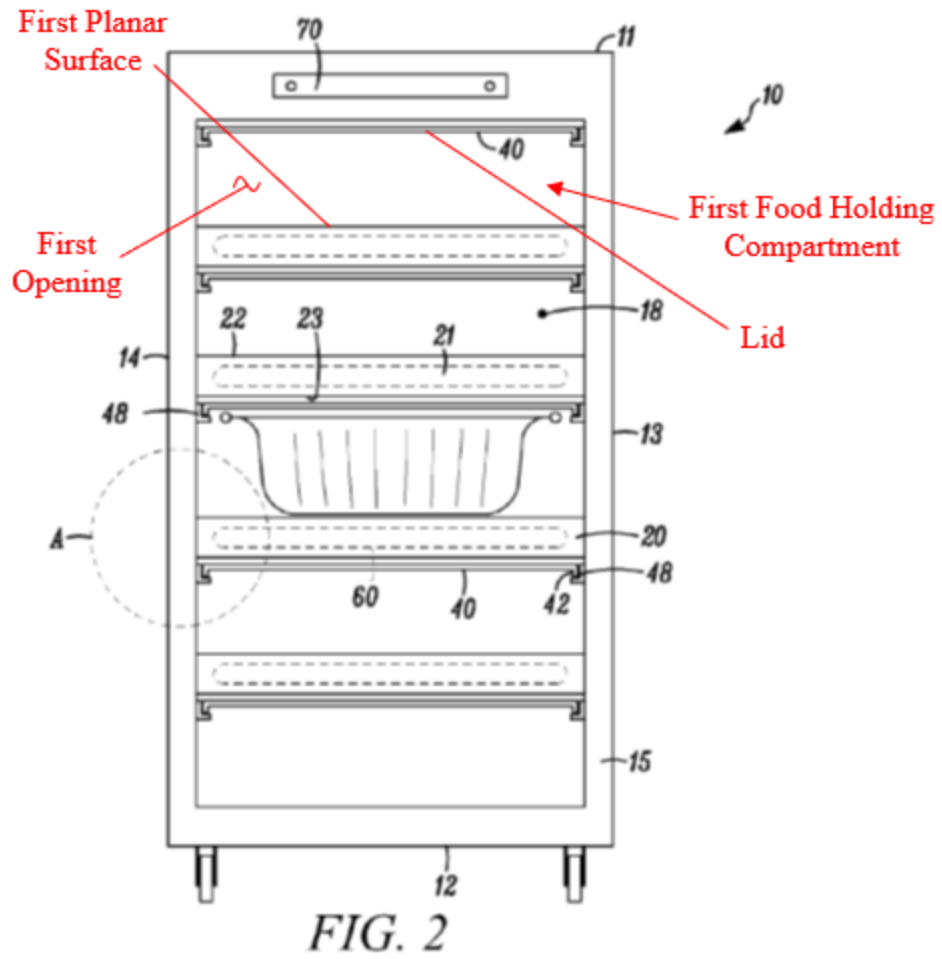
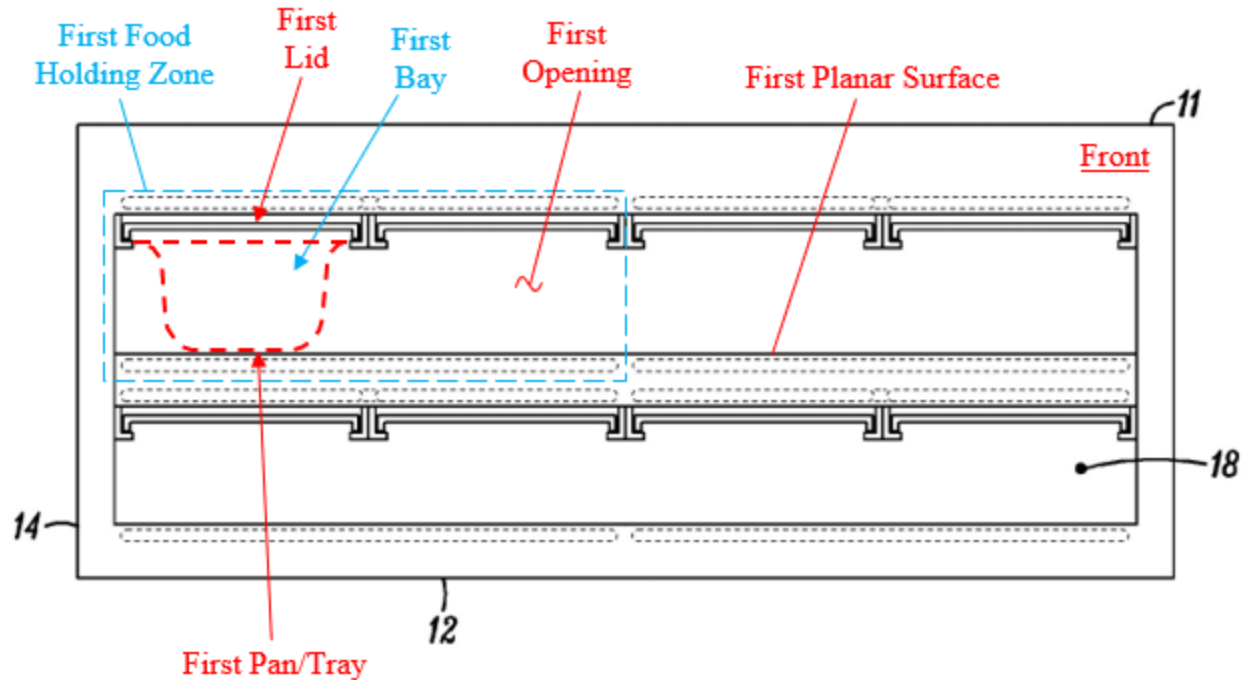


FIG. 1



EX1010.



EX1010: Fig. 2 (modified).

11.b

Per Sections XIII(B)(1.a.4/1.a.8), XIII(F), XIII(I), it would have been obvious to receive a pan/tray through the first opening into the first zone's second bay onto the first planar surface to warm the food before serving. EX1010: ¶[0002]; EX1003: ¶¶943-945.

The IRHS Documents teach an arrangement where a holding zone having two bays holds burger patties in the first/left bay and fried chicken (tendercrisp) in the second/right bay. Sections IV(1.a.2/1.a.5), IV(H), IV(K)(11.b); EX1005: 8, 25; EX1007: 12; EX1003: ¶946.



EX1007: 12.

Merco teaches burger patties and fried chicken patties may use the same temperature settings (200°F). EX1028: 30, 39; EX1003: ¶947.

Per the IRHS Documents and/or Merco, it would have been obvious for modified Fortmann'748 to hold burger patties and fried chicken patties (capable of same-zone holding) in the first zone's first and second bays, respectively.

EX1003: ¶948; EX1007: 12; EX1028: 39. For similar reasons in Sections XIII(B)(1.a.4/1.a.8), XIII(B)(1.b/1.c/1.d/1.e), XIII(F), XIII(I), it would have been obvious to receive a pan/tray (second) of the chicken patties (second product) through the first opening into the second bay onto the first planar surface to locate the fried chicken patties in the second bay to warm the food before serving.

EX1010: ¶[0002]; EX1003: ¶949.

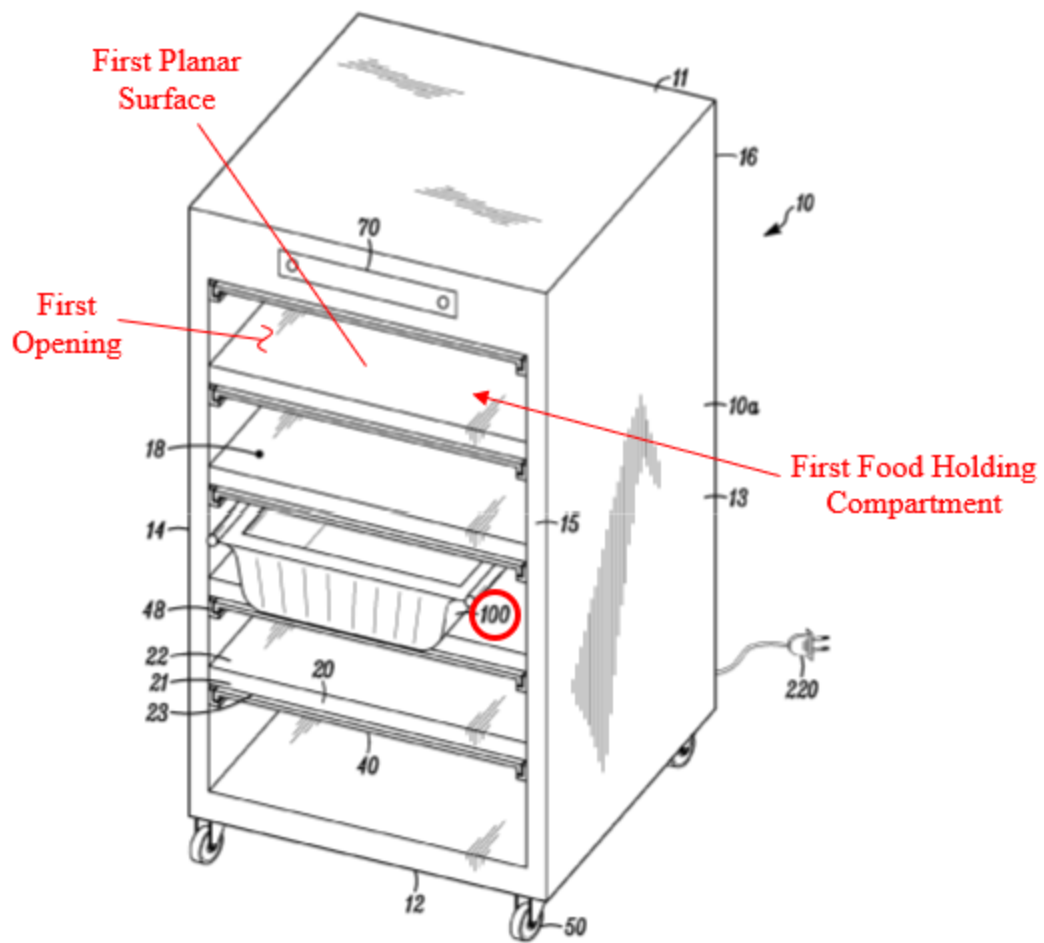
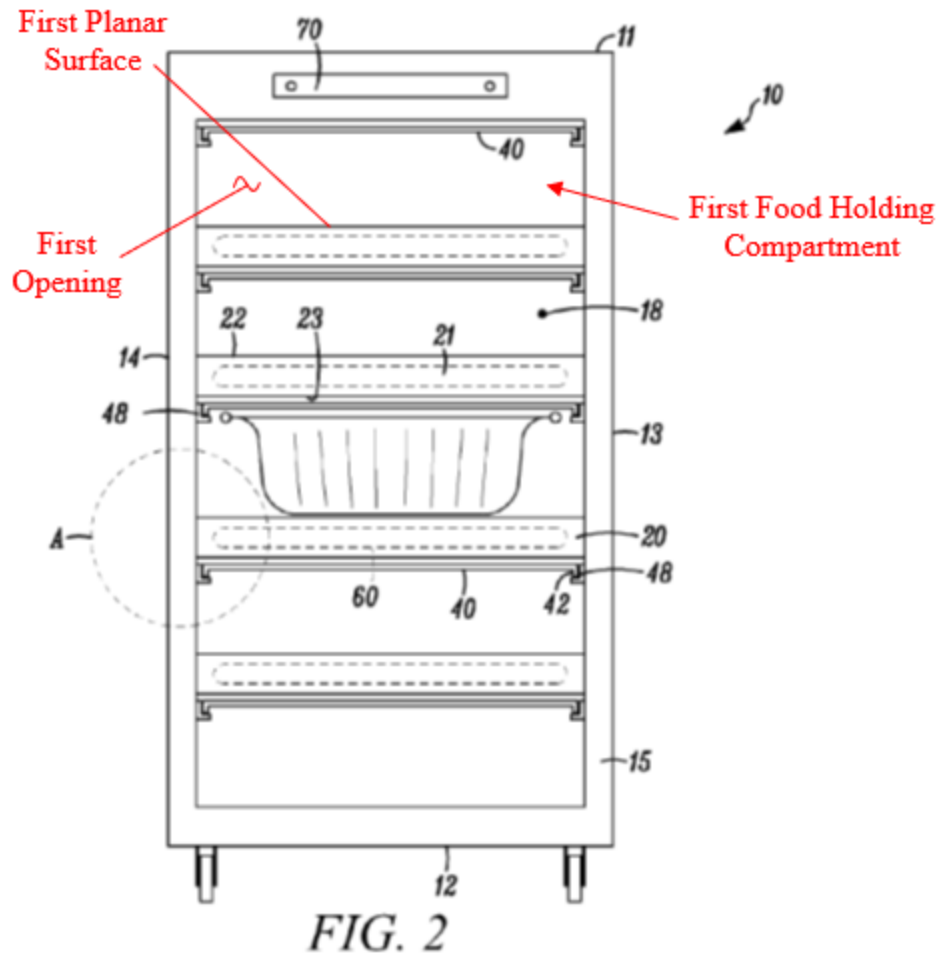
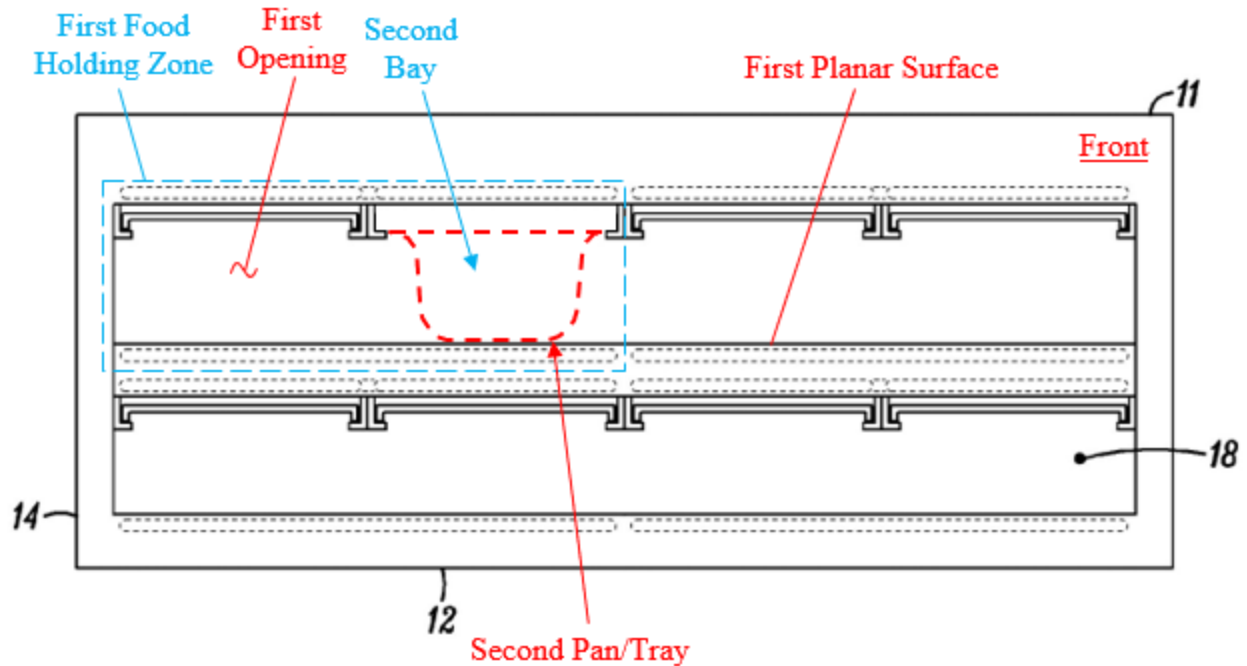


FIG. 1



EX1010.

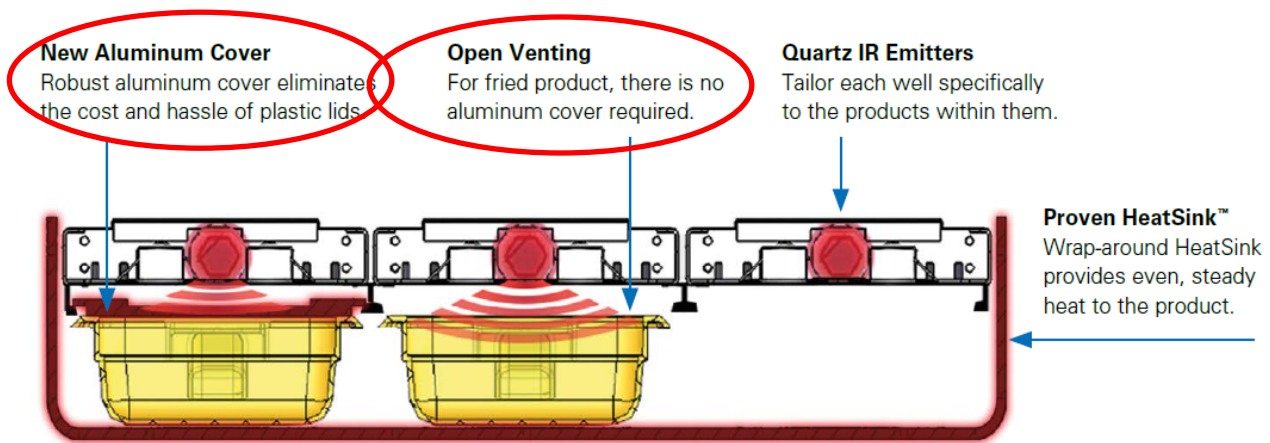


EX1010: Fig. 2 (modified).

11.c

Fortmann'748's removable lids retain moisture in the pans/trays. EX1010: Abstract, ¶[0004], ¶¶[0017]-[0018]; Section XIII(A)(7); EX1003: ¶950.

The IRHS Documents, Hartfelder, Fortmann'197, and Shei'099 each teach different food types being heated with lids (broiled/non-fried foods—lids used to keep food moist) and without lids (fried foods—no lids to allow moisture to escape to prevent soggy food). EX1005: 16; EX1013: ¶[0006], ¶[0044]; EX1014: 7:45-67; EX1017: 6:45-53; EX1003: ¶¶951-955.



EX1007: 53.

Per IRHS Documents, Hartfelder, Fortmann'197, and/or Shei'099, it would have been obvious to use a lid to keep the burger patties moist and for the breaded chicken to be uncovered (no lid) to allow the moisture to vent, preventing sogginess. EX1005: 16; EX1013: ¶¶[0006], [0044]; EX1014: 7:45-67; EX1017: 6:45-53; EX1003: ¶¶956-957.

This applies a known technique (lids for non-fried foods and no lids for fried foods) to improve a similar device (Fortmann'748) in the same way (insert/remove lids as needed based on food type) with reasonable expectation of success (Fortmann'748's lids selectively removeable). EX1010: ¶¶[0017]-[0018]; EX1028: 39. EX1003: ¶¶958-959.

Therefore, it would have been obvious for Fortmann'748 to maintain with the first lid an increased moisture content within the first pan/tray (burger patties) compared to the moisture in the second tray (fried chicken patties, lidless for venting) while the first zone's first and second bays are being heated. EX1003:

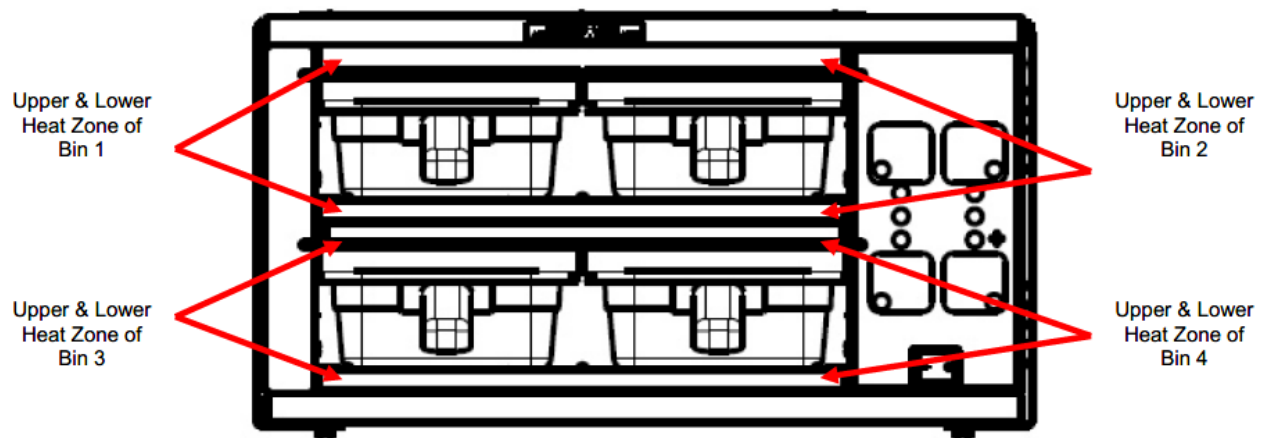
¶960. The first zone's first and second bays are operated to the first temperature setpoint by independently operating the first and second heaters per Sections XIII(B)(1.b/1.c/1.d/1.e), XIII(A)(2)-(3). EX1003: ¶¶960-961.

B. Claim 19

Merco explains certain foods (eggs) need more lower heat (180°F) than upper heat (160°F) in warming cabinets. EX1028: 30, 39; EX1003: ¶¶962, 967-968.



EX1028: 21 (unannotated).

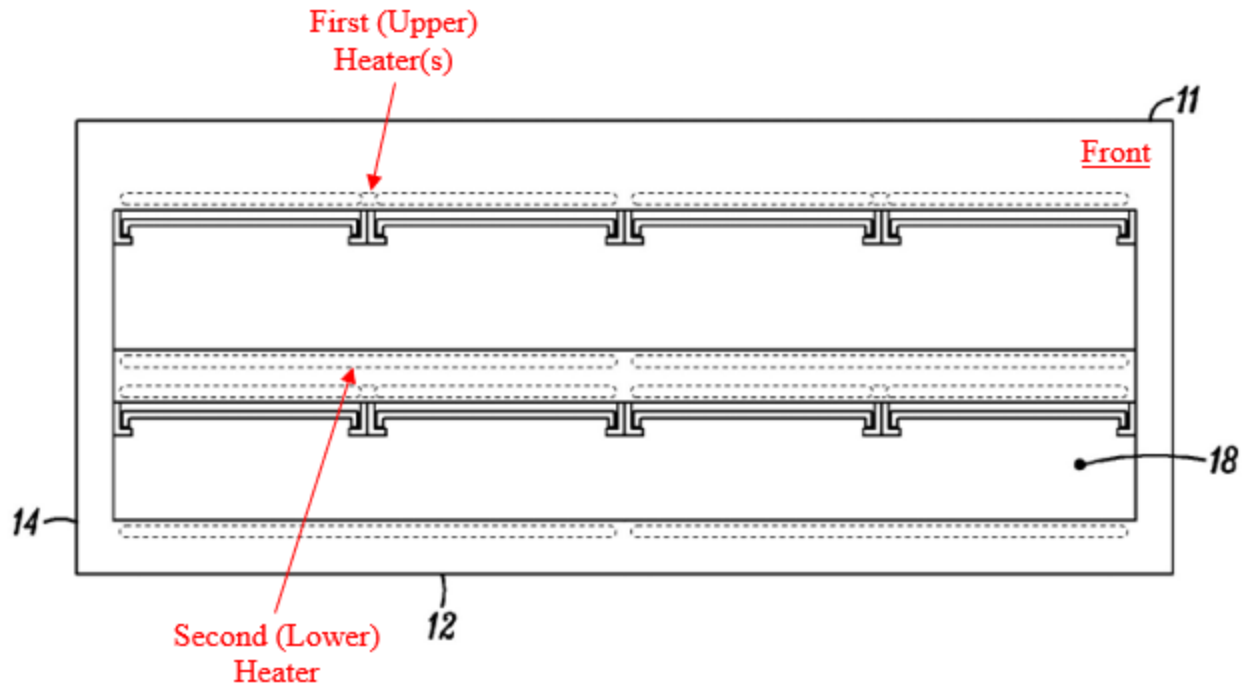


EX1028: 30 (annotations original).

Per Merco, it would have been obvious to have each lower (second) heater output more heat than each upper (first) heater for each to hold food products (eggs) requiring a higher lower temperature compared to an upper temperature. EX1028: 39; EX1003: ¶¶966, 969.

Moreover, as the heaters of each zone are independently controllable (Section XIII(A)(3)) and it was known to have different upper and lower heating temperatures for food products (EX1028: 31, 39), operating the second heater to output more heat than the first heater would have been an obvious design choice (evidenced by Merco/eggs) from a set of finite, predictable solutions (upper heat greater than, equal to, or less than lower heat). *Uber Techs., Inc. v. X One, Inc.*, 957 F.3d 1334, 1341 (Fed. Cir. 2020); EX1028: 31, 39; EX1003: ¶¶963-965.

This uses a known technique (lower elements outputting more heat than upper elements per Merco) to improve a similar device (Fortmann'748) in the same way (higher lower target temperature than upper target temperature) with reasonable expectation of success (Fortmann'748's heaters independently controllable and prior art demonstrating suitability). EX1028: 31, 39; EX1003: ¶¶970-972.



EX1010: Fig. 2 (modified).

XVI. MANDATORY NOTICES UNDER 37 C.F.R. §42.8

A. Real Parties-In-Interest under 37 C.F.R. §42.8(b)(1)

Duke Manufacturing Co. is the real party-in-interest for this Petition.

B. Related Matters under 37 C.F.R. §42.8(b)(2)

The '264 Patent is involved in a civil action in *Marmon Foodservice Technologies, Inc. v. Duke Manufacturing Co.*, 4:25-cv-01491, currently pending in the United States District Court for the Eastern District of Missouri.

The '264 Patent claims priority to U.S. Patent Nos. 10,852,002, 10,512,363, and 9,976,750, which are each currently the subject of an Inter Partes Review (IPR2026-00406, IPR2026-00483, IPR2026-00484).

The '264 Patent recites very similar subject matter to the claims of U.S. Patent Nos. 9,980,322, 10,492,641, and 10,841,981. U.S. Patent Nos. 9,980,322, 10,492,641, and 10,841,981 are each currently the subject of an Inter Partes Review (IPR2026-00481, IPR2026-00480, and IPR2026-00479).

C. Designation of Lead and Back-Up Counsel under 37 C.F.R. §42.8(b)(3)

Pursuant to 37 C.F.R. §§42.8(b)(3) and 42.10(a), Duke Manufacturing Co. provides the following designation of counsel:

LEAD COUNSEL	BACK-UP COUNSEL
William R. Everding, Reg. No. 67,087 STINSON LLP 7700 Forsyth Boulevard, Suite 1100 St. Louis, MO 63105 T: 314-345-7016; F: 314-863-9388 Email: william.everding@stinson.com	Steven Levitt, Reg. No. 76,498 STINSON LLP 7700 Forsyth Boulevard, Suite 1100 St. Louis, MO 63105 T: 314-345-7016; F: 314-863-9388 Email: steven.levitt@stinson.com
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D. Service Information (37 C.F.R. §42.8(b)(4)):

Duke Manufacturing Co. consents to service by email to lead and backup counsel, using the email addresses above.

E. Payment Information Under 37 C.F.R. §§42.15(a) and 42.103(a)

The *Inter Partes* review fees have been submitted herewith pursuant to 37 C.F.R. §§42.103(a) and 42.15(a).

XVII. GROUNDS FOR STANDING

Petitioner is not barred or estopped from petitioning and the '264 Patent is eligible for inter partes review. Petitioner was not served with a complaint alleging infringement of the '264 Patent more than one year before this Petition's filing.

XVIII. CONCLUSION

Inter partes review is requested.

Dated: October 2, 2026

Respectfully submitted,
/William R. Everding/
William R. Everding, Reg. No. 67,087
Counsel for Petitioner

CERTIFICATE OF SERVICE

Under 37 C.F.R. § 42.6(e), the undersigned certifies that on October 2, 2026, a copy of the PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO. 11,771,264 and associated exhibits were served via FedEx pursuant to 37 C.F.R. § 42.105 on the following attorneys of record for Patent Owner:

26753 – Andrus Intellectual Property Law, LLP
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Patent Owner's Correspondence Address of Record for U.S. Patent 11,771,264

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By: /William R. Everding/
William R. Everding
Reg. No. 67,087
Lead Counsel for Petitioner

**CERTIFICATE OF COMPLIANCE WITH TYPE-VOLUME
REQUIREMENTS UNDER 37 C.F.R. §42.24**

Under 37 C.F.R. § 42.24(d), the undersigned certifies that this Petition for *Inter Partes* Review complies with the type-volume limitation of 37 C.F.R. § 42.24(a)(1) because it contains 13,982 words, excluding the parts of the Petition exempted by 37 C.F.R. §42.24(a).

This paper also complies with the typeface requirements of 37 C.F.R. § 42.6(a)(2)(ii) and the type style requirements of 37 C.F.R. § 42.6(a)(2)(iii) and (iv).

/William R. Everding/
William R. Everding, Reg. No. 67,087
Lead Counsel for Petitioner

Claims Appendix – U.S. Patent No. 11,771,264

The following claim listing shows the claims of the '264 Patent with reference identifiers (“Ref. ID”) corresponding to claim limitations.

Ref. ID	Claim Limitation
1.P	A method of maintaining different temperatures within a multi-zone food holding bin, the multi-zone food holding bin comprising
1.a.1	a chassis having a top panel, a first side panel, a second side panel, a bottom panel, and a front face,
1.a.2	the multi-zone food holding bin having a first food holding compartment within the chassis and comprising a first food holding zone and a second food holding zone,
1.a.3	the first food holding compartment being defined by the first side panel, the second side panel, the top panel that provides a first top surface, and a first substantially planar bottom surface of a thermally conductive material being substantially unobstructed between the first side panel and the second side panel and
1.a.4	a first opening through the front face configured to allow a tray for food items to be passed through the first opening into the first food holding compartment and onto the first substantially planar surface and
1.a.5	a second food holding compartment within the chassis and comprising a third food holding zone and a fourth food holding zone,
1.a.6	the second food holding compartment being defined by the first side panel, the second side panel, the bottom panel that provides a second substantially planar bottom surface of a thermally conductive material, and a second top surface,

Ref. ID	Claim Limitation
1.a.7	the second substantially planar bottom surface being substantially unobstructed between the first side panel and the second side panel and
1.a.8	a second opening into the second food holding compartment and onto the second substantially planar surface,
1.b	the method comprising: operating the first food holding zone to a first temperature setpoint by independently operating a first heating element in the first food holding zone and thermally coupled to the first top surface and independently operating a second heating element in the first food holding zone and thermally coupled to the first substantially planar surface;
1.c	operating the second food holding zone to a second temperature setpoint by independently operating a third heating element in the second food holding zone and thermally coupled to the first top surface and independently operating a fourth heating element in the second food holding zone and thermally coupled to the first substantially planar surface;
1.d	operating the third food holding zone to a third temperature setpoint by independently operating a fifth heating element in the third food holding zone and thermally coupled to the second top surface and independently operating a sixth heating element in the third food holding zone and thermally coupled to the second substantially planar surface; and
1.e	operating the fourth food holding zone to a fourth temperature setpoint by independently operating a seventh heating element in the fourth food holding zone and thermally coupled to the second top surface and independently operating an eighth heating element in the fourth food holding zone and thermally coupled to the second substantially planar surface;
1.f	wherein the first temperature, second temperature, third temperature, and fourth temperature are independent from each other.

Ref. ID	Claim Limitation
2	The method of claim 1, wherein the multi-zone food holding bin further comprises a shelf disposed between the first side panel and the second side panel, wherein a top surface of the shelf provides the first substantially planar bottom surface and a bottom surface of the shelf provides the second top surface.
3.a.1	The method of claim 1, wherein the multi-zone food holding bin further comprises a third food holding compartment within the chassis between the first food holding compartment and the second food holding compartment,
3.a.2	the third food holding compartment comprising a fifth food holding zone and a sixth food holding zone,
3.a.3	the third food holding compartment being defined by the first side panel, the second side panel, a third top surface, and a third substantially planar bottom surface of a thermally conductive material being substantially unobstructed between the first side panel and the second side panel and
3.a.4	a third opening through the front face configured to allow a tray for food items to be passed through the third opening into the third food holding compartment and onto the third substantially planar surface,
3.b	the method further comprising: operating the fifth food holding zone to a fifth temperature setpoint by independently operating a ninth heating element in the fifth food holding zone and thermally coupled to the third top surface and independently operating a tenth heating element in the fifth food holding zone and thermally coupled to the third substantially planar surface; and
3.c	operating the sixth food holding zone to a sixth temperature setpoint by independently operating an eleventh heating element in the sixth food holding zone and thermally coupled to the third top surface and independently operating a twelfth heating element in the sixth food holding zone and thermally coupled to the third substantially planar surface.

Ref. ID	Claim Limitation
4.a.1	The method of claim 3, wherein the multi-zone food holding bin comprises a first shelf disposed between the first side panel and the second side panel and between the first compartment and the second compartment,
4.a.2	wherein a first top surface of the first shelf provides the first substantially planar bottom surface and a first bottom surface of the first shelf provides the third top surface, and
4.a.3	the multi-zone food holding bin further comprises a second shelf disposed between the first side panel and the second side panel and between the third compartment and the second compartment,
4.a.4	wherein a second top surface of the second shelf provides the third substantially planar bottom surface and a second bottom surface of the second shelf provides the second top surface.
5	The method of claim 1, further comprising: receiving a first tray of a first food product through the first opening into the first food holding zone; receiving a second tray of a second food product through the first opening into the second food holding zone; receiving a third tray of a third food product through the second opening into the third food holding zone; and receiving a fourth tray of a fourth food product through the second opening into the fourth food holding zone.
6.a	The method of claim 5 wherein the multi-zone food holding bin comprises a rear face and
6.b	the method further comprises: providing a third opening through the rear face configured to allow the first or second tray to be passed through the third opening into the first food holding compartment and onto the first substantially planar surface; and
6.c	providing a fourth opening through the rear face configured to allow the third or fourth tray to be passed through the fourth opening into the second food holding compartment and onto the second substantially planar surface.

Ref. ID	Claim Limitation
7	The method of claim 6, further comprising: receiving a tray of the first, second, third, and fourth trays, when said tray is filled with freshly cooked food product, through the respective third or fourth opening; and receiving the tray of the first, second, third, and fourth trays, when food product has been removed from said tray, through the respective first or second opening.
8.a	The method of claim 1, wherein the multi-zone food holding bin comprises a plurality of bays, the plurality of bays comprising a first bay and a second bay within the first food heating zone, a third bay and a fourth bay within the second food heating zone, a fifth bay and a sixth bay within the third food heating zone, and a seventh bay and an eighth bay within the fourth food heating zone,
8.b	wherein each bay of the plurality of bays is configured to receive a tray of food product.
9	The method of claim 8, further comprising plurality of lid holding shelves, a lid holding shelf of the plurality of lid holding shelves associated with each bay of the plurality of bays, wherein each lid holding shelf is configured to receive a lid thereon.
10.a	The method of claim 9, further comprising: receiving a first lid through the first opening into the first bay of the first food holding zone; and
10.b	retaining the first lid within the first bay on the lid holding shelf associated with the first bay.
11.a	The method of claim 10, further comprising: receiving a first tray of a first food product through the first opening into the first bay of the first food holding zone onto the first substantially planar bottom surface below the first lid;
11.b	receiving a second tray of a second food product through the first opening into the second bay of the first food holding zone onto the first substantially planar bottom surface; and

Ref. ID	Claim Limitation
11.c	maintaining, with the first lid, an increased moisture within the first tray compared to a moisture within the second tray, while operating the first bay and the second bay of the first food holding zone to the first temperature setpoint by independently operating the first heating element and the second heating element.
12	The method of claim 9, wherein at least some of the lid holding shelves of the plurality of lid holding shelves downwardly depend from the first top surface towards the first substantially planar bottom surface, leaving the first substantially planar bottom surface substantially unobstructed between the first side panel and the second side panel.
13.a	The method of claim 12, further comprising providing a latch associated with at least one of the lid holding shelves,
13.b	the latch movably secured to the front face.
14	The method of claim 13, further comprising biasing the latch into a position that retains a lid on the associated lid holding shelf with gravity.
15.a	The method of claim 14, further comprising providing a bezel set forward of the front face to form a gap between the front face and the bezel,
15.b	wherein the latch moves within the gap.
16	The method of claim 1, further comprising receiving a user input of the first temperature setpoint.
17	The method of claim 16, wherein the user input is a user selection of a food item for the first food holding zone, wherein the user selection of the food item is associated with independent operation and control of the first heating element and the second heating element.

Ref. ID	Claim Limitation
18	The method of claim 17, further comprising operating the first heating element to output more heat than the second heating element.
19	The method of claim 17, further comprising operating the second heating element to output more heat than the first heating element.
20.a	The method of claim 16, further comprising: providing a bezel set forward of the front face, the bezel comprising a user interface; and
20.b	operating the user interface to receive the user input.