

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
AUGUSTA DIVISION

|                 |   |                        |
|-----------------|---|------------------------|
| Solbello, Inc., | ) |                        |
| Plaintiff       | ) |                        |
|                 | ) | CIVIL ACTION FILE NO.: |
| v.              | ) | 1:25-cv-00267-JRH-BKE  |
|                 | ) |                        |
| ShoreShade LLC, | ) |                        |
| Defendant       | ) |                        |

**PLAINTIFF’S SUPPLEMENTED  
DISCLOSURE OF ASSERTED CLAIMS AND  
PRELIMINARY INFRINGEMENT CONTENTIONS**

In accordance with this Court’s Scheduling Order (D.E. 63) and the Local Patent Rules of the United States District Court for the Northern District of California (“Local Patent Rules” or “L.P.R.”), as adopted by the parties for use in this action, Plaintiff Solbello, Inc. (“Solbello”) hereby makes the following L.P.R. 3-1 Disclosures against Defendant ShoreShade LLC (“ShoreShade”). These disclosures are based upon information reasonably available to Solbello at the present time. Solbello reserves the right to supplement or amend these disclosures in accordance with the Federal Rules of Civil Procedure, this Court’s Local Rules, and the Local Patent Rules as Solbello obtains additional information.

This case is at an early stage. Discovery has just begun and the parties have yet to produce documents. These disclosures are necessarily based upon the limited number of documents and the information presently available. To the extent additional evidence of infringement of the patent-in-suit by ShoreShade exists, Solbello expressly reserves its right to rely on such evidence. Any omission of evidence

of direct or indirect infringement in these contentions is not to be construed as an admission or a waiver of the right to rely on such evidence.

Further, to the extent these disclosures do not refute each and every factual or legal contention or argument that will be set forth in ShoreShade's non-infringement and patent invalidity contentions, such omission or failure to refute or address shall not be construed as an admission of ShoreShade's contentions nor a waiver of the right to refute or address them at a later date. Solbello expressly reserves the right to refute any and all contentions set forth by ShoreShade in its non-infringement and patent invalidity contentions.

**I. L.P.R. 3-1 Disclosures**

**A. L.P.R. 3-1(a): Identification of Patents and Claims Infringed**

Based upon the information currently available, Solbello contends that the following claims of U.S. Reissue Patent No. RE50,606 E (the "606 Patent"), titled "Self-Adjusting Sun Shade Assembly," are infringed by ShoreShade's accused products in accordance with the theories of infringement described below: Claims 21, 22, 24, 26, 27, 29, 34, 44, 45, and 47 of the '606 Patent. Solbello alleges that each of these claims is infringed by ShoreShade under 35 U.S.C. § 271(a), (b), and (c).

**B. L.P.R. 3-1(b): Accused Instrumentalities**

The Accused Instrumentalities that infringe Claims 21, 22, 24, 26, 27, 29, 34, 44, 45, and 47 of the '606 Patent include ShoreShade's sunshade products, including, but not limited to: (1) the product previously marketed and sold by ShoreShade as its original sunshade ("Alleged First Iteration ShoreShade"); and (2) the product

currently marketed and sold by ShoreShade as its purported “next generation” or “new and improved” sunshade (“Alleged Second Iteration ShoreShade”) (collectively, the “Accused Instrumentalities”). Specifically, the Alleged First Iteration ShoreShade infringes Claims 44 and 45, and the Alleged Second Iteration ShoreShade infringes Claims 21, 22, 24, 26, 27, 29, 34, 44, 45, and 47.

The Accused Instrumentalities include all versions, variations, and configurations of the ShoreShade sunshade product, whether sold through ShoreShade’s website (<https://shop.shoreshadesails.com/>), through Amazon.com, or through any other channel of commerce.

**C. L.P.R. 3-1(c): Claim Charts**

In accordance with the Local Patent Rules, it should be understood that although Solbello’s claim charts refer to supporting evidence, the included evidence supporting Solbello’s contentions is not meant to be exhaustive. Solbello reserves the right to support its contentions with additional evidence, such as evidence to be produced by ShoreShade or third parties regarding the products Solbello contends to be infringing. Solbello reserves the right to seek leave of the Court to add, delete, supplement, or modify these contentions should further discovery, the Court’s Claim Construction, or other circumstances so merit.

**CLAIM CHART FOR**  
**ALLEGED FIRST ITERATION SHORESHADE**

| '606<br>Patent<br>Claim | Limitation                                                                                                   | Evidence                                                                                                                                                                                                 |
|-------------------------|--------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 44                      | <i>A sun shade assembly comprising:</i>                                                                      |  <p style="text-align: center; color: red;"><i>Prior iteration of ShoreShade website</i></p>                           |
| 44<br>(cont'd)          | <i>a mast configured to extend upwardly from a supporting surface, and having a top end and a bottom end</i> |  <p style="text-align: center; color: red;"><i>Mast extending upwardly from the beach ("supporting surface")</i></p> |

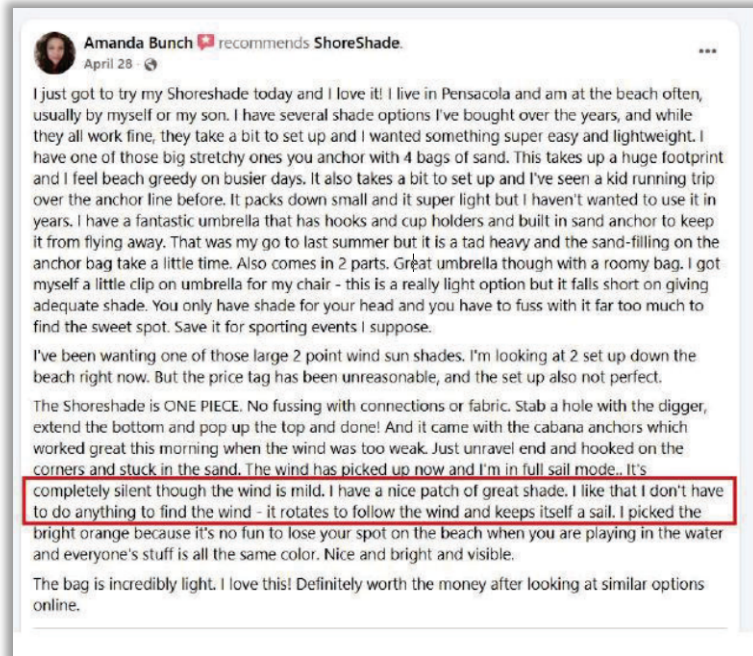
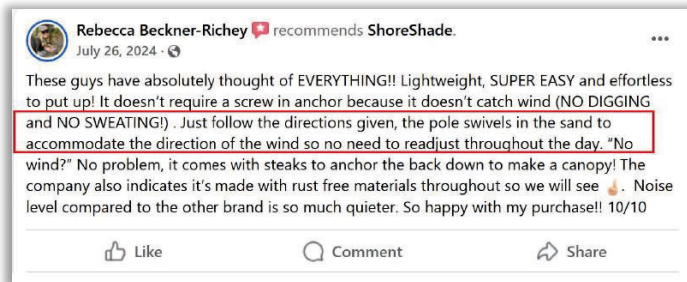
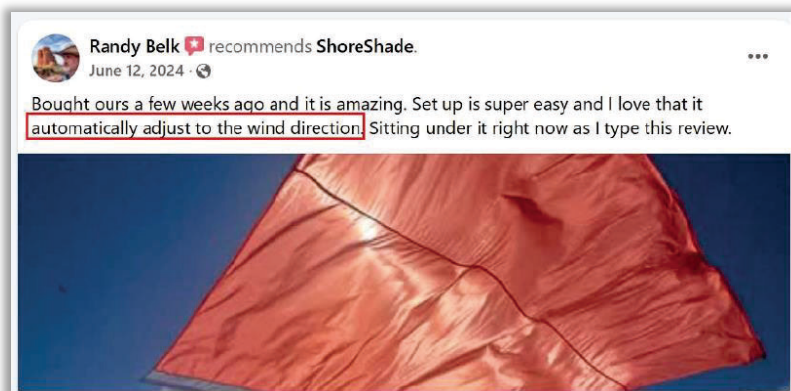
| '606<br>Patent<br>Claim | Limitation                                                                         | Evidence                                                                                                                                 |
|-------------------------|------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| 44<br>(cont'd)          | <i>at least one<br/>rib located<br/>proximate<br/>the top end of<br/>said mast</i> | <p><i>Ribs located at the top end of the mast</i></p>  |

44  
(cont'd)

[said rib]  
configured to  
rotate  
relative to  
the  
supporting  
surface

*Entire product rotates in sand to  
match direction of the wind*

*See Facebook reviews of Alleged First Iteration  
ShoreShade:*



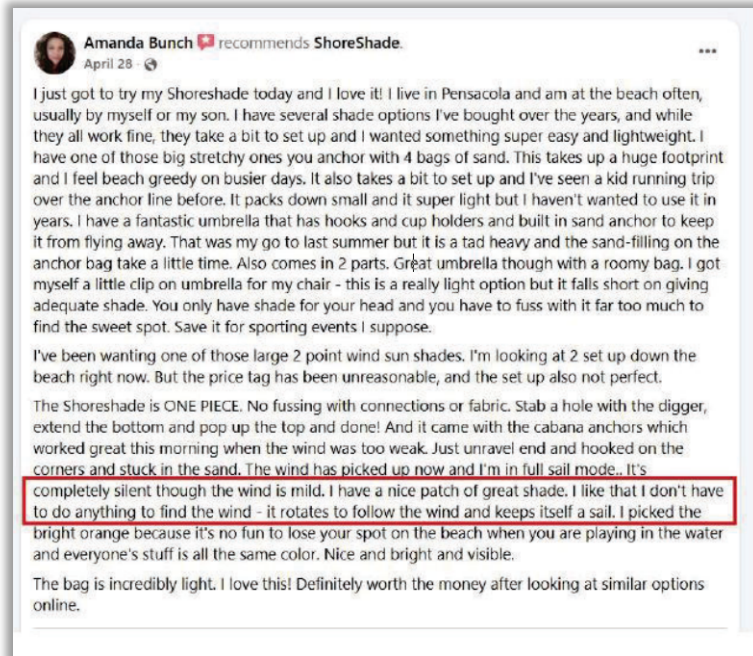
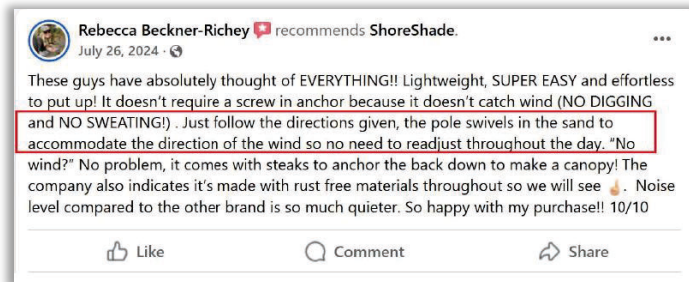
| '606 Patent Claim | Limitation                                                                                                                           | Evidence                                                                                                                                                                                                                                                                                           |
|-------------------|--------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 44 (cont'd)       | a sail having a proximal edge secured to said rib and an unrestrained free edge adapted to unfurl in response to blowing of the wind | <p data-bbox="586 390 1414 457"><i>Proximal edge of sail is secured to the rib while free edge of sail is unrestrained</i></p>  <p data-bbox="586 957 1089 989"><i>Free edge of sail unfurls in the wind</i></p> |
| 44 (cont'd)       | and wherein an entire surface area of said sail is unrestrained from the proximal edge to the free edge                              | <p data-bbox="586 1058 1414 1125"><i>No restraining structure between proximal and free edges of the sail</i></p>                                                                                              |

44  
(cont'd)

*when unfurled, said sail and rib are adapted to rotate together to a direction of the blowing wind*

*Entire product rotates in sand to match direction of the wind*

*See Facebook reviews of Alleged First Iteration ShoreShade:*



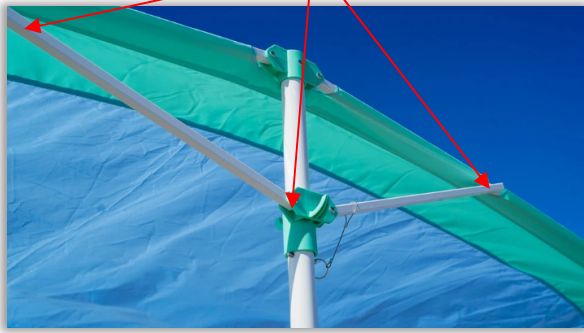
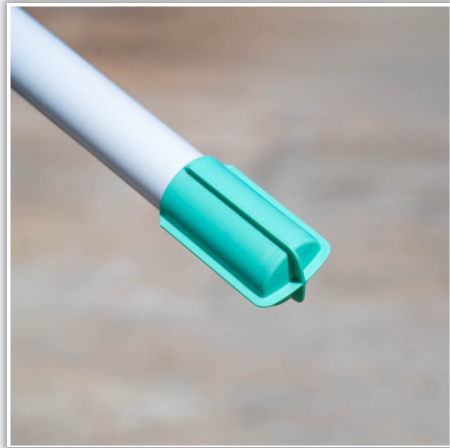
| '606<br>Patent<br>Claim | Limitation                                                                                                               | Evidence                                                                                                                             |
|-------------------------|--------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 45                      | <i>The assembly of claim 44, wherein said at least one rib is attached to a cap located at the top end of said mast.</i> | <p><i>Ribs attached to cap at top of mast</i></p>  |

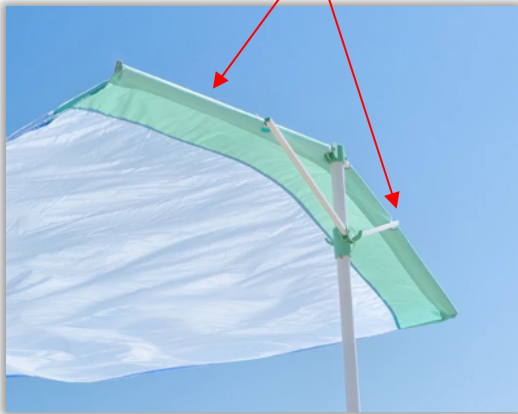
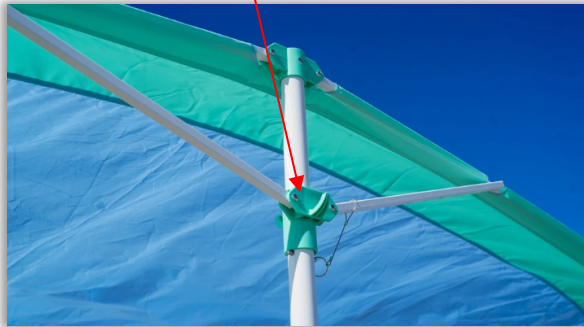
**CLAIM CHART FOR**  
**ALLEGED SECOND ITERATION SHORESHADE**

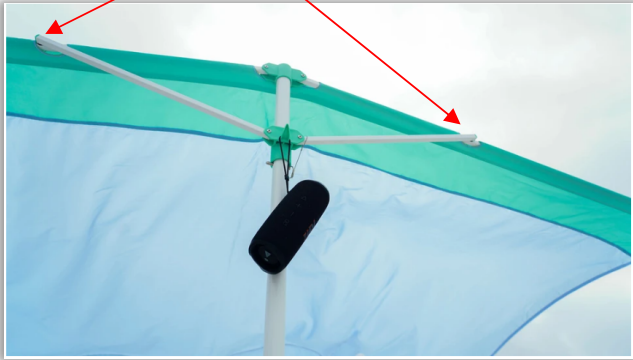
| '606 Patent Claim | Limitation                                                                                                                  | Evidence                                                                                                                                                                                                |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 21                | <i>A sun shade assembly comprising:</i>                                                                                     |  <p style="text-align: center;"><i>ShoreShade website</i></p>                                                         |
| 21 (cont'd)       | <i>a pair of ribs defined by a first end and a second end, wherein the first end of each rib is attached to a pivot cap</i> | <p style="text-align: center;"><i>Two ribs, each with two ends, with one end of each attached to pivot cap</i></p>  |

| '606 Patent Claim | Limitation                                                                                                                        | Evidence                                                                                                                                                                                                                                                                                                                                                                                                           |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 21 (cont'd)       | <i>a sail with a front edge comprising a channel sized and shaped to house each rib such that the ribs extend across the edge</i> | <p data-bbox="950 352 1218 388"><i>Sail has front edge</i></p>  <p data-bbox="760 951 1409 1056"><i>Sail includes channel that is sized and shaped to house both ribs, such that the ribs extend across the entire edge of the sail</i></p>  |

| '606 Patent Claim | Limitation                                                                                                                                                                  | Evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 21 (cont'd)       | <i>a mast comprising a first end and a second end, wherein the first end is operably connected to the pivot cap, wherein the pivot cap can freely rotate about the mast</i> | <p><i>Mast has first end (top) and second end (bottom)</i></p>  <p><i>Top of mast is operably connected to the pivot cap</i></p>  <p><i>Entire product rotates in sand to match direction of the wind</i></p> <p><i>See videos submitted in support of Solbello's Second Motion for Preliminary Injunction:</i><br/> <a href="https://dub.sh/mWRi4Te">https://dub.sh/mWRi4Te</a><br/> <a href="https://dub.sh/CfGy1rG">https://dub.sh/CfGy1rG</a></p> |

| '606 Patent Claim  | Limitation                                                                                                                                                                                                                             | Evidence                                                                                                                                                                                                                                                                                                                                                                 |
|--------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>21 (cont'd)</b> | <i>at least one support arm with a first end and a second end, wherein the first end of the support arm is attached to a rib and the second end of the support arm is attached to a slider configured to move up and down the mast</i> | <p><i>Support arms each have one end connected to a rib and the other attached to a slider</i></p>  <p><i>Slider is configured to move up and down the mast</i></p> <p><i>See ShoreShade setup video at 0:09:<br/> <a href="https://dub.sh/ELYIXWw">https://dub.sh/ELYIXWw</a></i></p> |
| <b>21 (cont'd)</b> | <i>an anchor operably connected to the second end of the mast</i>                                                                                                                                                                      | <p><i>End cap connected to bottom of mast</i></p>                                                                                                                                                                                                                                    |

| '606 Patent Claim | Limitation                                                                                                                              | Evidence                                                                                                                                                                                                                                                                                                            |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 21 (cont'd)       | <i>wherein the pivot cap, ribs, slider, and support arms are configured to rotate about the mast in response to blowing of the wind</i> | <p><i>Entire product rotates in sand to match direction of the wind</i></p> <p><i>See videos submitted in support of Solbello's Second Motion for Preliminary Injunction:</i><br/> <a href="https://dub.sh/mWRi4Te">https://dub.sh/mWRi4Te</a><br/> <a href="https://dub.sh/CfGy1rG">https://dub.sh/CfGy1rG</a></p> |
| 22                | <i>The assembly of claim 21, wherein the ribs are configured at an angle of greater than 180 degrees relative to each other.</i>        | <p><i>Ribs are at more than 180-degree angle relative to each other, from top of one rib to top of other rib.</i></p>                                                                                                            |
| 24                | <i>The assembly of claim 21, wherein the slider is configured as a collar that fits around the exterior circumference of the mast.</i>  | <p><i>Slider is a collar that fits around the mast</i></p>                                                                                                                                                                      |

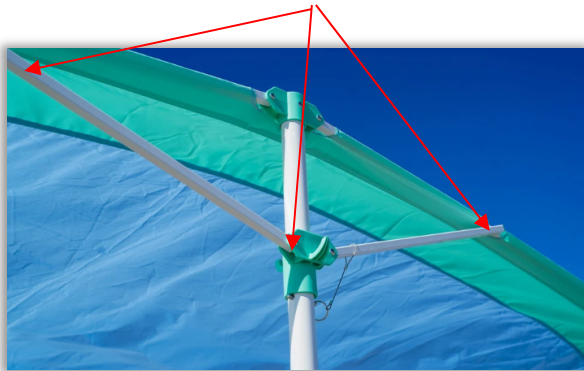
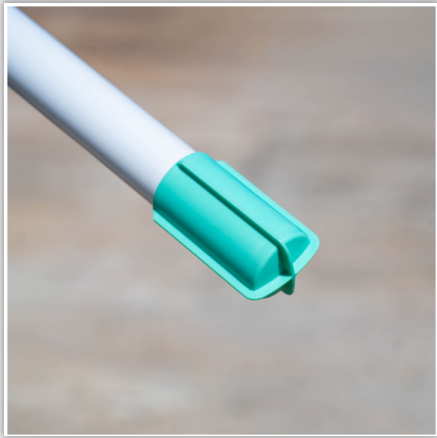
| '606 Patent Claim | Limitation                                                                                                                                                                | Evidence                                                                                                                                                                                                                                                                             |
|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 26                | <p><i>The assembly of claim 21, wherein the sail channel comprises one or more apertures to facilitate insertion of the ribs into the channel.</i></p>                    | <p><i>Opening at front of sail includes gaps into which the ribs are inserted</i></p>  <p><i>See also ShoreShade setup video: <a href="https://dub.sh/ELYIXWw">https://dub.sh/ELYIXWw</a>.</i></p> |
| 27                | <p><i>The assembly of claim 21, wherein the sail channel comprises one or more apertures to allow direct contact between each rib and a corresponding support arm</i></p> | <p><i>Channel at front of sail contains two openings that allow each support arm to directly connect to a rib</i></p>                                                                            |

| '606 Patent Claim | Limitation                                                                                                                                                  | Evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 29                | <i>The assembly of claim 21, wherein the sail has a top face and a bottom face and wherein at least one of the top or bottom faces comprises a coating.</i> | <p><i>Sail has top face</i></p>  <p><i>Sail has bottom face</i></p>  <p><i>Upon information and belief, ShoreShade applies a UV coating to its products' sails</i></p> <div data-bbox="802 1377 1364 1614"> <p><b>Why You'll Love It:</b></p> <ul style="list-style-type: none"> <li>• Shade for 2-3 People</li> <li>• Solo Setup in 1 Minute or Less</li> <li>• Ultra-Lightweight (less than 5 pounds)</li> <li>• UPF 50+ Protection</li> </ul> </div> <p><i>ShoreShade's website claims "UPF 50+ Protection"</i></p> |

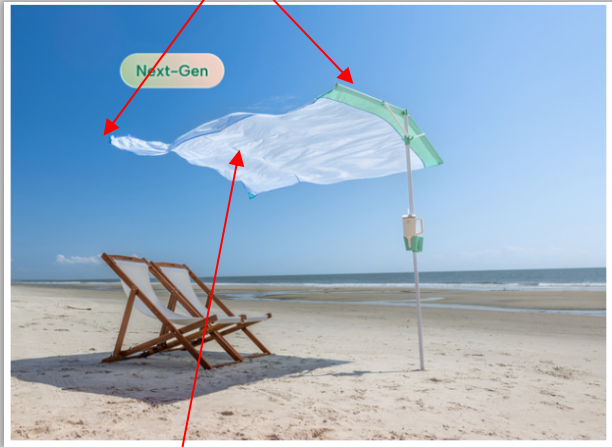
| '606 Patent Claim | Limitation                                                                                                                  | Evidence                                                                                                                                                                                                                            |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 34                | <i>A method of using a sunshade, the method comprising:</i>                                                                 |  <p><i>ShoreShade website</i></p>                                                                                                                 |
| 34 (cont'd)       | <i>positioning an anchor of a sun shade assembly in a support surface, wherein the sun shade assembly comprises:</i>        | <p><i>Anchor is inserted into ground</i></p> <p><i>See video submitted by ShoreShade in opposition to Solbello's Second Motion for Preliminary Injunction:</i><br/> <a href="https://dub.sh/qKBol9w">https://dub.sh/qKBol9w</a></p> |
| 34 (cont'd)       | <i>a pair of ribs defined by a first end and a second end, wherein the first end of each rib is attached to a pivot cap</i> | <p><i>Two ribs, each with two ends, with one end of each attached to pivot cap</i></p>                                                          |

| '606 Patent Claim | Limitation                                                                                                                        | Evidence                                                                                                                                                                                                                                                                                                                                                                                                           |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 34 (cont'd)       | <i>a sail with a front edge comprising a channel sized and shaped to house each rib such that the ribs extend across the edge</i> | <p data-bbox="950 352 1218 388"><i>Sail has front edge</i></p>  <p data-bbox="760 953 1409 1058"><i>Sail includes channel that is sized and shaped to house both ribs, such that the ribs extend across the entire edge of the sail</i></p>  |

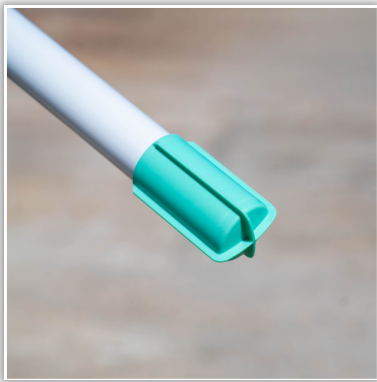
| '606 Patent Claim | Limitation                                                                                                                                                                  | Evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 34 (cont'd)       | <i>a mast comprising a first end and a second end, wherein the first end is operably connected to the pivot cap, wherein the pivot cap can freely rotate about the mast</i> | <p><i>Mast has first end (top) and second end (bottom)</i></p>  <p><i>Top of mast is operably connected to the pivot cap</i></p>  <p><i>Entire product rotates in sand to match direction of the wind</i></p> <p><i>See videos submitted in support of Solbello's Second Motion for Preliminary Injunction:</i><br/> <a href="https://dub.sh/mWRi4Te">https://dub.sh/mWRi4Te</a><br/> <a href="https://dub.sh/CfGy1rG">https://dub.sh/CfGy1rG</a></p> |

| '606 Patent Claim | Limitation                                                                                                                                                                                                                             | Evidence                                                                                                                                                                                                                                                                                                                                                             |
|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 34 (cont'd)       | <i>at least one support arm with a first end and a second end, wherein the first end of the support arm is attached to a rib and the second end of the support arm is attached to a slider configured to move up and down the mast</i> | <p><i>Support arms each have one end connected to a rib and the other attached to a slider</i></p>  <p><i>Slider is configured to move up and down the mast</i></p> <p><i>See ShoreShade setup video at 0:09: <a href="https://dub.sh/ELYIXWw">https://dub.sh/ELYIXWw</a>.</i></p> |
| 34 (cont'd)       | <i>the anchor operably connected to the second end of the mast</i>                                                                                                                                                                     | <p><i>End cap connected to bottom of mast</i></p>                                                                                                                                                                                                                                |

| '606 Patent Claim | Limitation                                                                                                   | Evidence                                                                                                                                                                                                                                                                                                            |
|-------------------|--------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 34 (cont'd)       | <i>wherein the sun shade assembly self-adjusts in response to the blowing of the wind</i>                    | <p><i>Entire product rotates in sand to match direction of the wind</i></p> <p><i>See videos submitted in support of Solbello's Second Motion for Preliminary Injunction:</i><br/> <a href="https://dub.sh/mWRi4Te">https://dub.sh/mWRi4Te</a><br/> <a href="https://dub.sh/CfGy1rG">https://dub.sh/CfGy1rG</a></p> |
| 44                | <i>A sun shade assembly comprising:</i>                                                                      |  <p><i>ShoreShade website</i></p>                                                                                                                                                                                                |
| 44 (cont'd)       | <i>a mast configured to extend upwardly from a supporting surface, and having a top end and a bottom end</i> |  <p><i>Mast extending upwardly from the beach ("supporting surface")</i></p>                                                                                                                                                    |

| '606 Patent Claim | Limitation                                                                                                                                  | Evidence                                                                                                                                                                                                                                                                                                                |
|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 44 (cont'd)       | <i>at least one rib located proximate the top end of said mast</i>                                                                          | <p><i>Ribs located at the top end of the mast</i></p>                                                                                                                                                                                 |
| 44 (cont'd)       | <i>[said rib] configured to rotate relative to the supporting surface</i>                                                                   | <p><i>Entire product rotates in sand to match direction of the wind</i></p> <p><i>See videos submitted in support of Solbello's Second Motion for Preliminary Injunction:</i></p> <p><a href="https://dub.sh/mWRi4Te">https://dub.sh/mWRi4Te</a></p> <p><a href="https://dub.sh/CfGy1rG">https://dub.sh/CfGy1rG</a></p> |
| 44 (cont'd)       | <i>a sail having a proximal edge secured to said rib and an unrestrained free edge adapted to unfurl in response to blowing of the wind</i> | <p><i>Proximal edge of sail is secured to the rib while free edge of sail is unrestrained</i></p>  <p><i>Free edge of sail unfurls in the wind</i></p>                                                                              |

| '606 Patent Claim | Limitation                                                                                                     | Evidence                                                                                                                                                                                                                                                                                                                |
|-------------------|----------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 44 (cont'd)       | <i>and wherein an entire surface area of said sail is unrestrained from the proximal edge to the free edge</i> | <p><i>No restraining structure between proximal and free edges of the sail</i></p>                                                                                                                                                    |
| 44 (cont'd)       | <i>when unfurled, said sail and rib are adapted to rotate together to a direction of the blowing wind</i>      | <p><i>Entire product rotates in sand to match direction of the wind</i></p> <p><i>See videos submitted in support of Solbello's Second Motion for Preliminary Injunction:</i></p> <p><a href="https://dub.sh/mWRi4Te">https://dub.sh/mWRi4Te</a></p> <p><a href="https://dub.sh/CfGy1rG">https://dub.sh/CfGy1rG</a></p> |

| '606 Patent Claim | Limitation                                                                                                               | Evidence                                                                                                                                                            |
|-------------------|--------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 45                | <i>The assembly of claim 44, wherein said at least one rib is attached to a cap located at the top end of said mast.</i> | <p data-bbox="841 352 1334 386"><i>Ribs attached to cap at top of mast</i></p>    |
| 47                | <i>The assembly of claim 44, and comprising an anchor located at the bottom end of said mast.</i>                        | <p data-bbox="821 953 1354 987"><i>End cap connected to bottom of mast</i></p>  |

#### **D. L.P.R. 3-1(d): Indirect Infringement**

ShoreShade induces infringement under 35 U.S.C. § 271(b) when it, with knowledge of the '606 Patent, makes the Accused Instrumentalities available for consumers to purchase or use, and in fact encourages such purchase and use by consumers in an infringing manner through marketing activities, instruction

materials, and the placement of the Accused Instrumentalities into the stream of commerce. As such, ShoreShade induces infringement of the asserted patent by consumers of the Accused Instrumentalities when used in their ordinary and intended use. ShoreShade has had knowledge of the '606 Patent since at least the filing of this action on November 7, 2025, and upon information and belief, since at least November 17, 2023, when Solbello sent ShoreShade a cease-and-desist letter addressing ShoreShade's wrongful conduct.

ShoreShade contributorily infringes under 35 U.S.C. § 271(c) due to its offerings and sales, and in providing the Accused Instrumentalities to consumers for use in practicing the asserted claims. The Accused Instrumentalities are a material part of the asserted claims. ShoreShade knows that the Accused Instrumentalities are especially made or adapted for use in infringement of the '606 Patent, and the Accused Instrumentalities have no substantial non-infringing uses.

With respect to the indirect infringement of the Asserted Claims, the underlying direct infringement occurs when customers who purchase the ShoreShade use the product, which contains the Accused Instrumentalities. In addition, with respect to all types of infringement, Solbello hereby incorporates the allegations concerning infringement contained in its Amended Complaint.

**E. L.P.R. 3-1(e): Literal Infringement and Doctrine of Equivalents**

For each Accused Instrumentality, the following charts identify whether each limitation of each asserted claim is infringed literally or under the doctrine of equivalents.

**ALLEGED FIRST ITERATION SHORESHADE:**

| <b>'606 Patent Claim</b> | <b>Limitation</b>                                                                                                                           | <b>Literal or Doctrine of Equivalents</b>                                                                                                                                                                                                                                                                                                                |
|--------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>44</b>                | <i>A sun shade assembly comprising:</i>                                                                                                     | <b>Literal</b>                                                                                                                                                                                                                                                                                                                                           |
| <b>44 (cont'd)</b>       | <i>a mast configured to extend upwardly from a supporting surface, and having a top end and a bottom end</i>                                | <b>Literal</b>                                                                                                                                                                                                                                                                                                                                           |
| <b>44 (cont'd)</b>       | <i>at least one rib located proximate the top end of said mast</i>                                                                          | <b>Literal</b>                                                                                                                                                                                                                                                                                                                                           |
| <b>44 (cont'd)</b>       | <i>[said rib] configured to rotate relative to the supporting surface</i>                                                                   | <p>Should the Court adopt ShoreShade's preferred construction and construe "configured to" to mean "specifically designed to," and "supporting surface" to mean "mast": <b>Doctrine of Equivalents</b></p> <p>Should the Court adopt a broader construction, e.g., that the shade need only rotate relative to the ground (or beach): <b>Literal</b></p> |
| <b>44 (cont'd)</b>       | <i>a sail having a proximal edge secured to said rib and an unrestrained free edge adapted to unfurl in response to blowing of the wind</i> | <b>Literal</b>                                                                                                                                                                                                                                                                                                                                           |

|                    |                                                                                                                          |                |
|--------------------|--------------------------------------------------------------------------------------------------------------------------|----------------|
| <b>44 (cont'd)</b> | <i>and wherein an entire surface area of said sail is unrestrained from the proximal edge to the free edge</i>           | <b>Literal</b> |
| <b>44 (cont'd)</b> | <i>when unfurled, said sail and rib are adapted to rotate together to a direction of the blowing wind</i>                | <b>Literal</b> |
| <b>45</b>          | <i>The assembly of claim 44, wherein said at least one rib is attached to a cap located at the top end of said mast.</i> | <b>Literal</b> |

**ALLEGED SECOND ITERATION SHORESHADE:**

| <b>'606 Patent Claim</b> | <b>Limitation</b>                                                                                                                 | <b>Literal or Doctrine of Equivalents</b> |
|--------------------------|-----------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|
| <b>21</b>                | <i>A sun shade assembly comprising:</i>                                                                                           | <b>Literal</b>                            |
| <b>21 (cont'd)</b>       | <i>a pair of ribs defined by a first end and a second end, wherein the first end of each rib is attached to a pivot cap</i>       | <b>Literal</b>                            |
| <b>21 (cont'd)</b>       | <i>a sail with a front edge comprising a channel sized and shaped to house each rib such that the ribs extend across the edge</i> | <b>Literal</b>                            |

| <b>'606 Patent Claim</b> | <b>Limitation</b>                                                                                                                                                                                                                      | <b>Literal or Doctrine of Equivalents</b> |
|--------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|
| <b>21 (cont'd)</b>       | <i>a mast comprising a first end and a second end, wherein the first end is operably connected to the pivot cap, wherein the pivot cap can freely rotate about the mast</i>                                                            | <b>Doctrine of Equivalents</b>            |
| <b>21 (cont'd)</b>       | <i>at least one support arm with a first end and a second end, wherein the first end of the support arm is attached to a rib and the second end of the support arm is attached to a slider configured to move up and down the mast</i> | <b>Literal</b>                            |
| <b>21 (cont'd)</b>       | <i>an anchor operably connected to the second end of the mast</i>                                                                                                                                                                      | <b>Literal</b>                            |
| <b>21 (cont'd)</b>       | <i>wherein the pivot cap, ribs, slider, and support arms are configured to rotate about the mast in response to blowing of the wind</i>                                                                                                | <b>Doctrine of Equivalents</b>            |
| <b>22</b>                | <i>The assembly of claim 21, wherein the ribs are configured at an angle of greater than 180 degrees relative to each other.</i>                                                                                                       | <b>Literal</b>                            |

| <b>'606 Patent Claim</b> | <b>Limitation</b>                                                                                                                                                   | <b>Literal or Doctrine of Equivalents</b> |
|--------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|
| <b>24</b>                | <i>The assembly of claim 21, wherein the slider is configured as a collar that fits around the exterior circumference of the mast.</i>                              | <b>Literal</b>                            |
| <b>26</b>                | <i>The assembly of claim 21, wherein the sail channel comprises one or more apertures to facilitate insertion of the ribs into the channel.</i>                     | <b>Literal</b>                            |
| <b>27</b>                | <i>The assembly of claim 21, wherein the sail channel comprises one or more apertures to allow direct contact between each rib and a corresponding support arm.</i> | <b>Literal</b>                            |
| <b>29</b>                | <i>The assembly of claim 21, wherein the sail has a top face and a bottom face and wherein at least one of the top or bottom faces comprises a coating.</i>         | <b>Literal</b>                            |
| <b>34</b>                | <i>A method of using a sunshade, the method comprising:</i>                                                                                                         | <b>Literal</b>                            |

| <b>'606 Patent Claim</b> | <b>Limitation</b>                                                                                                                                                           | <b>Literal or Doctrine of Equivalents</b> |
|--------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|
| <b>34 (cont'd)</b>       | <i>positioning an anchor of a sun shade assembly in a support surface, wherein the sun shade assembly comprises:</i>                                                        | <b>Literal</b>                            |
| <b>34 (cont'd)</b>       | <i>a pair of ribs defined by a first end and a second end, wherein the first end of each rib is attached to a pivot cap</i>                                                 | <b>Literal</b>                            |
| <b>34 (cont'd)</b>       | <i>a sail with a front edge comprising a channel sized and shaped to house each rib such that the ribs extend across the edge</i>                                           | <b>Literal</b>                            |
| <b>34 (cont'd)</b>       | <i>a mast comprising a first end and a second end, wherein the first end is operably connected to the pivot cap, wherein the pivot cap can freely rotate about the mast</i> | <b>Doctrine of Equivalents</b>            |

| <b>'606 Patent Claim</b> | <b>Limitation</b>                                                                                                                                                                                                                      | <b>Literal or Doctrine of Equivalents</b> |
|--------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|
| <b>34 (cont'd)</b>       | <i>at least one support arm with a first end and a second end, wherein the first end of the support arm is attached to a rib and the second end of the support arm is attached to a slider configured to move up and down the mast</i> | <b>Literal</b>                            |
| <b>34 (cont'd)</b>       | <i>the anchor operably connected to the second end of the mast</i>                                                                                                                                                                     | <b>Literal</b>                            |
| <b>34 (cont'd)</b>       | <i>wherein the sun shade assembly self-adjusts in response to the blowing of the wind</i>                                                                                                                                              | <b>Literal</b>                            |
| <b>44</b>                | <i>A sun shade assembly comprising:</i>                                                                                                                                                                                                | <b>Literal</b>                            |
| <b>44 (cont'd)</b>       | <i>a mast configured to extend upwardly from a supporting surface, and having a top end and a bottom end</i>                                                                                                                           | <b>Literal</b>                            |
| <b>44 (cont'd)</b>       | <i>at least one rib located proximate the top end of said mast</i>                                                                                                                                                                     | <b>Literal</b>                            |

| '606 Patent Claim | Limitation                                                                                                                                  | Literal or Doctrine of Equivalents                                                                                                                                                                                                                                                                                                                |
|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 44 (cont'd)       | <i>[said rib] configured to rotate relative to the supporting surface</i>                                                                   | Should the Court adopt ShoreShade's preferred construction and construe "configured to" to mean "specifically designed to," and "supporting surface" to mean "mast": <b>Doctrine of Equivalents</b><br><br>Should the Court adopt a broader construction, e.g., that the shade need only rotate relative to the ground (or beach): <b>Literal</b> |
| 44 (cont'd)       | <i>a sail having a proximal edge secured to said rib and an unrestrained free edge adapted to unfurl in response to blowing of the wind</i> | <b>Literal</b>                                                                                                                                                                                                                                                                                                                                    |
| 44 (cont'd)       | <i>and wherein an entire surface area of said sail is unrestrained from the proximal edge to the free edge</i>                              | <b>Literal</b>                                                                                                                                                                                                                                                                                                                                    |
| 44 (cont'd)       | <i>when unfurled, said sail and rib are adapted to rotate together to a direction of the blowing wind</i>                                   | <b>Literal</b>                                                                                                                                                                                                                                                                                                                                    |
| 45                | <i>The assembly of claim 44, wherein said at least one rib is attached to a cap located at the top end of said mast.</i>                    | <b>Literal</b>                                                                                                                                                                                                                                                                                                                                    |

| '606 Patent Claim | Limitation                                                                                        | Literal or Doctrine of Equivalents |
|-------------------|---------------------------------------------------------------------------------------------------|------------------------------------|
| 47                | <i>The assembly of claim 44, and comprising an anchor located at the bottom end of said mast.</i> | <b>Literal</b>                     |

Solbello reserves the right, consistent with the Local Patent Rules, the Federal Rules, and other applicable authority, to revise its infringement theories and to identify additional accused instrumentalities as the case progresses (e.g., through discovery, claim construction, etc.).

**F. L.P.R. 3-1(f): Priority Date**

Each and every asserted claim of the '606 Patent is entitled to at least the priority date listed below:

- U.S. Reissue Patent No. RE50,606 E: Each asserted claim is entitled to a priority date at least as early as August 28, 2019, the filing date of U.S. Provisional Patent Application No. 62/892,700, from which the '606 Patent claims priority.

**G. L.P.R. 3-1(g): Product Practices Claimed Invention**

Solbello asserts that its product, the Solbello Shade, practices the claimed inventions of the '606 Patent.

**H. L.P.R. 3-1(h): Timing of Infringement and Damages**

Although discovery is ongoing and Solbello reserves the right to revise its damages theories, based on information and belief, ShoreShade's infringement began no later than September 2025, when the '606 Patent was issued. Solbello's damages

commenced at that time and remain ongoing, as ShoreShade continues to sell an infringing product.

**I. L.P.R. 3-1(i): Willfulness**

Upon information and belief, ShoreShade's infringement of the '606 Patent has been and continues to be willful. ShoreShade has had actual knowledge of the '606 Patent since at least the filing of this action on November 7, 2025. Moreover, ShoreShade's owner, Shawn Carnes, purchased a Solbello Shade from Solbello's website on December 1, 2022, and upon information and belief, used that product to copy, mirror, follow, and/or replicate the Solbello Shade's design, measurements, and materials. Solbello sent ShoreShade a cease-and-desist letter on or about November 17, 2023. Despite this knowledge, ShoreShade has continued to make, use, offer to sell, and sell the Accused Instrumentalities. ShoreShade's continued infringement despite actual knowledge of the '606 Patent and its deliberate copying of Solbello's product demonstrate willful infringement entitling Solbello to enhanced damages under 35 U.S.C. § 284.

**II. L.P.R. 3-2 Disclosures**

**A. L.P.R. 3-2(a): Offers to Sell Prior to Date of Application**

To the extent that any such documents exist, Solbello will produce them upon entry of a protective order.

**B. L.P.R. 3-2(b): Documents Evidencing Conception of Claimed Invention**

To the extent that any such documents exist, Solbello will produce them upon entry of a protective order.

**C. L.P.R. 3-2(c): Copy of File History**

A copy of the file history for the '606 Patent is attached hereto as **Exhibit A** (Solbello\_000001–000400).

**D. L.P.R. 3-2(d): Documents Evidencing Ownership**

A copy of the assignment for the '606 Patent is attached hereto as **Exhibit B** (Solbello\_000401–03).

**E. L.P.R. 3-2(e): Documents Evidencing Operation of Aspects of Instrumentalities Embodying Asserted Claims**

Solbello has provided documents sufficient to show the operation of its Solbello Shade product as embodying the asserted claims alongside its Second Motion for Preliminary Injunction, including photographs and video evidence. To the extent that any additional such documents exist, Solbello will produce them in responding to any appropriate discovery request.

**F. L.P.R. 3-2(f): Agreements Transferring Interest in Patent-in-Suit**

Solbello is not presently aware of such documents that would fall within this category. However, to the extent that Solbello becomes aware of any such documents, pursuant to the parties' agreement and the Court's scheduling order (D.E. 62, 63), Solbello will produce them upon entry of a protective order and after this Court conducts its claim construction hearing, at which time damages discovery will commence.

**G. L.P.R. 3-2(g): Agreements Related to Accused Instrumentality**

Solbello is not presently aware of such documents that would fall within this category. However, to the extent that Solbello becomes aware of any such documents,

pursuant to the parties' agreement and the Court's scheduling order (D.E. 62, 63), Solbello will produce them upon entry of a protective order and after this Court conducts its claim construction hearing, at which time damages discovery will commence.

**H. L.P.R. 3-2(h): Agreements Supporting Damages**

Solbello is not presently aware of such documents that would fall within this category. However, to the extent that Solbello becomes aware of any such documents, pursuant to the parties' agreement and the Court's scheduling order (D.E. 62, 63), Solbello will produce them upon entry of a protective order and after this Court conducts its claim construction hearing, at which time damages discovery will commence.

**I. L.P.R. 3-2(i): Documents Showing Marking of Product**

Solbello provides the following documents to show marking of its products that embody the asserted claims: a true and correct screenshot of its current website on which Solbello identifies its '606 Patent (**Exhibit C**) (Solbello\_000404), *available at* <https://solbello.com/pages/patents>; and a true and correct photograph of its current product packaging (**Exhibit D**) (Solbello\_000405).

**J. L.P.R. 3-2(j): F/RAND Commitments**

Solbello is not presently aware of such documents that would fall within this category. However, to the extent that Solbello becomes aware of any such documents, pursuant to the parties' agreement and the Court's scheduling order (D.E. 62, 63), Solbello will produce them upon entry of a protective order and after this Court

conducts its claim construction hearing, at which time damages discovery will commence.

This the 15th day of June, 2026.

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### Certificate of Service

I hereby certify that on June 15, 2026, I served the foregoing document to the following individuals by electronic mail at the following addresses which are the last addresses known to me:

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