

EXHIBIT A1 - U.S. PATENT NO. 5,904,172 VERSUS AMERICAN NATIONAL MANUFACTURING ACCUSED PRODUCTS

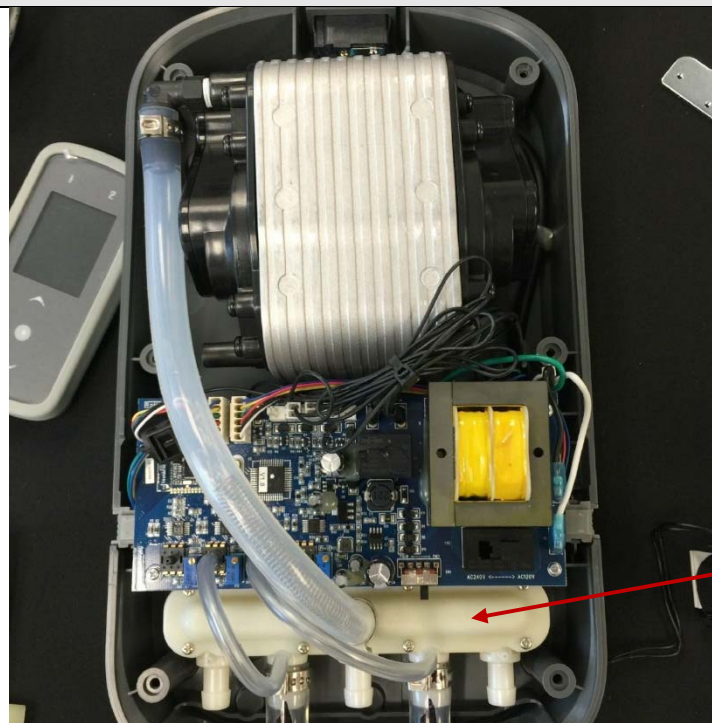
Pursuant to P.R. 3-1(c) and the Joint Stipulation Regarding Amending Infringement and Invalidity Contention (-356 case, Dkt. 138; -357, Dkt. 137), Plaintiff provides the chart below identifying specifically where each element of each asserted claim of the '172 Patent is found in Defendant's consumer and/or medical air mattress systems that utilize the Gen 3 Arco, Gen 3 Koge, and Gen X air controllers. Specifically, Plaintiff provides the following supplementation, which includes prior disclosures and supplementations provided to Defendants on September 7, September 16, and November 26, 2018; (2) adds to and/or clarifies contentions, where appropriate; and (3) adds variable names, written descriptions/summaries of Plaintiff's infringement position in light of the identified variables, and narrowed line number ranges where appropriate. These disclosures incorporate by reference the Representative Product Chart, served herewith. Further, these disclosures are made in light of foreseeable claim construction positions, are not to be construed as an acceptance or endorsement of any particular construction, and may be amended pursuant to P.R. 3-6(a)(1). Plaintiff reserves the right to amend this chart after Defendant meaningfully responds to discovery requests by producing a fulsome document production, including by producing documents that disclose all of Defendant's products and by providing all of Defendants' products for inspection. Plaintiff further reserves the right to amend this chart after Defendant allows for a sufficient inspection of all relevant Source Code, pursuant to stipulations between the parties.

CLAIM ELEMENT	INFRINGEMENT CONTENTIONS
<p>Claim 2</p> <p>2] An improved valve enclosure assembly for use with an air inflatable mattress having at least one air bladder inflated by compressed air, a pump fluidly coupled to the at least one air bladder for providing compressed air thereto, and a processor for providing commands to the improved valve enclosure assembly during an inflate/deflate cycle, the improved valve enclosure assembly being fluidly coupled intermediate the pump and at least one air bladder for controlling inflation of the at least one air bladder, comprising:</p>	<p>The preamble of claim 2 is limiting and under the plain and ordinary meaning of these claim terms in light of the specification, each claim limitation is met by ANM's Accused Products. Specifically, the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers include an improved valve enclosure assembly for use with an air inflatable mattress having at least one air bladder inflated by compressed air, a pump fluidly coupled to the at least one air bladder for providing compressed air thereto, and a processor for providing commands to the improved valve enclosure assembly during an inflate/deflate cycle, the improved valve enclosure assembly being fluidly coupled intermediate the pump and the at least one air bladder for controlling the inflation of the at least one air bladder.</p> <p>The Accused Products having a Gen 3 Arco air controller include an improved valve enclosure assembly for use with an air inflatable mattress having at least one air bladder inflated by compressed air:</p>

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CLAIM ELEMENT

INFRINGEMENT CONTENTIONS



Enclosure of Valve Enclosure Assembly

(Photograph of Gen 3 Arco)

The Accused Products having a Gen X air controller include an improved valve enclosure assembly for use with an air inflatable mattress having at least one air bladder inflated by compressed air:

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CLAIM ELEMENT

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Enclosure of Valve Enclosure Assembly

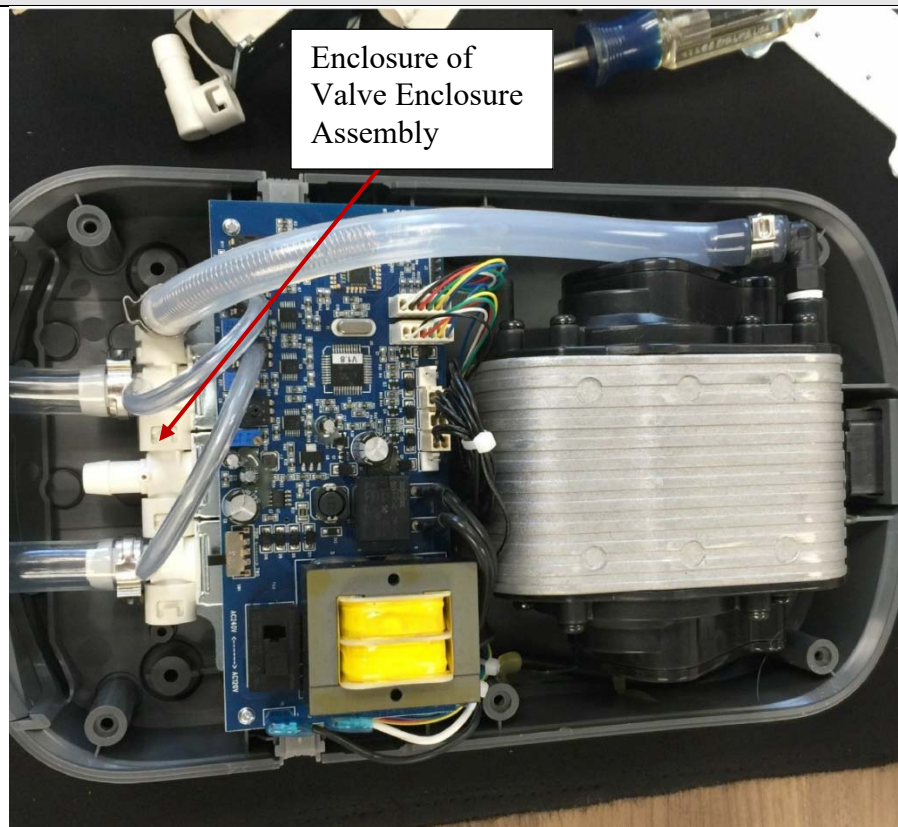
(Photograph of Gen X)

The Accused Products having a Gen 3 Koge air controller include an improved valve enclosure assembly for use with an air inflatable mattress having at least one air bladder inflated by compressed air:

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(Photograph of Gen 3 Koge)

The valve enclosure assemblies of the Gen 3 Arco, Gen X, and Gen 3 Koge are used with an air inflatable mattress having at least one air bladder inflated by compressed air. Non-limiting examples of said use is shown in the photographs below.

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Air Inflatable
Mattress

Air Controller
containing the Valve
Enclosure Assembly

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