

EXHIBIT C1: U.S. PATENT NO. 8,769,747 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 '747 Patent is found in Defendant's exemplary consumer air mattress system product, a Gen 3 Arco air controller with a model S9 bed. Specifically, Plaintiff provides the following supplementation, which includes prior disclosures and supplementations provided to Defendants on September 7, November 7, 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 able/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. 3-1(a)(1). Plaintiff reserves the right to amend this chart after Defendant meaningfully responds to discovery requests by making 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 LANGUAGE	INFRINGEMENT CONTENTIONS FOR ACCUSED PRODUCTS
e) A method for adjusting pressure in an air bed comprising:	<p>Each Accused Product fulfills the limitations set forth in this claim. Specifically, each Accused Product practices a method for adjusting pressure within an air bed.</p> <p>For example, ANM air bed includes a controller for adjusting pressure.</p>

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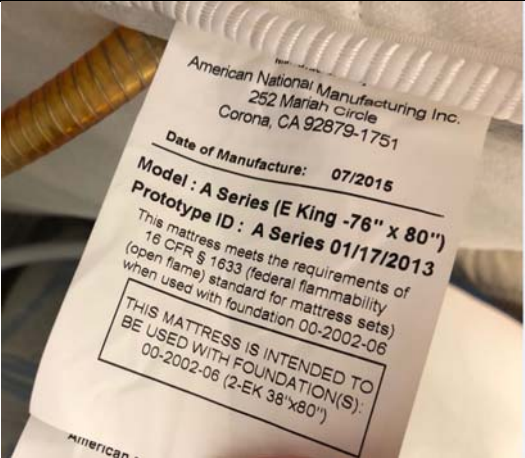
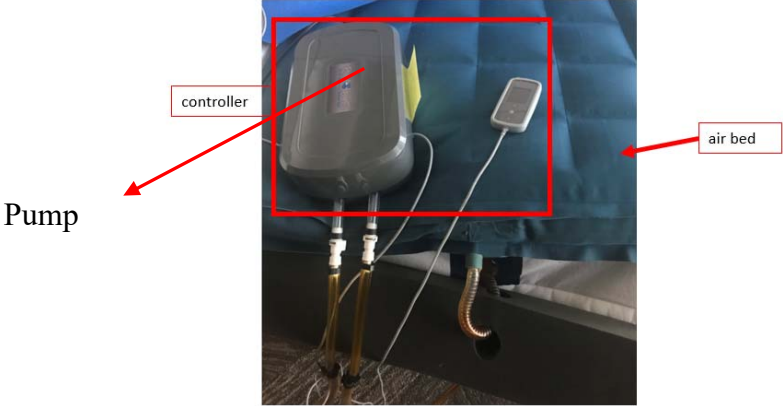

SIM LANGUAGE	INFRINGEMENT CONTENTIONS FOR ACCUSED PRODUCTS
	  

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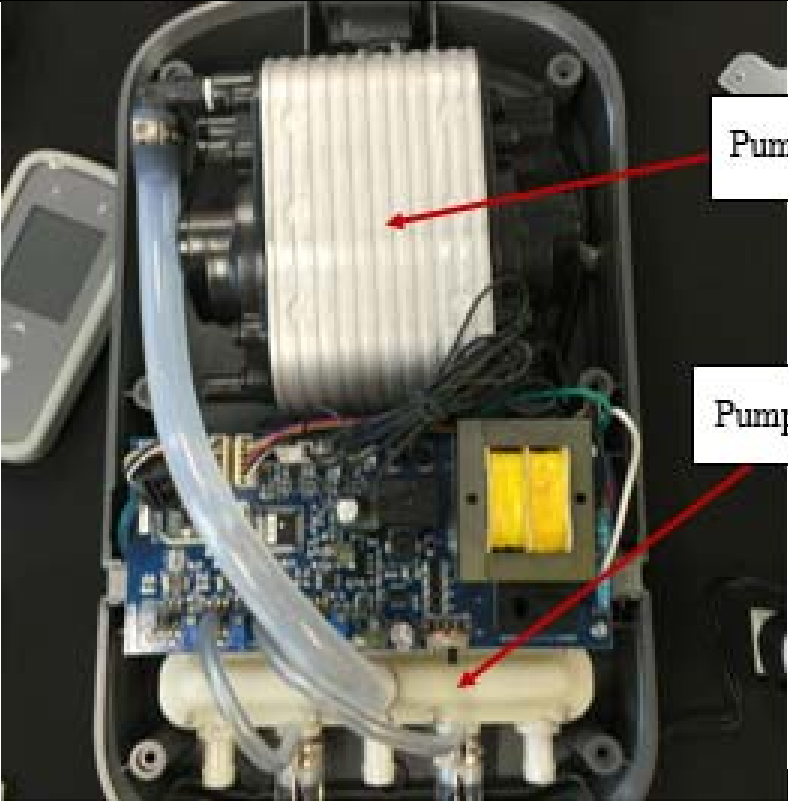
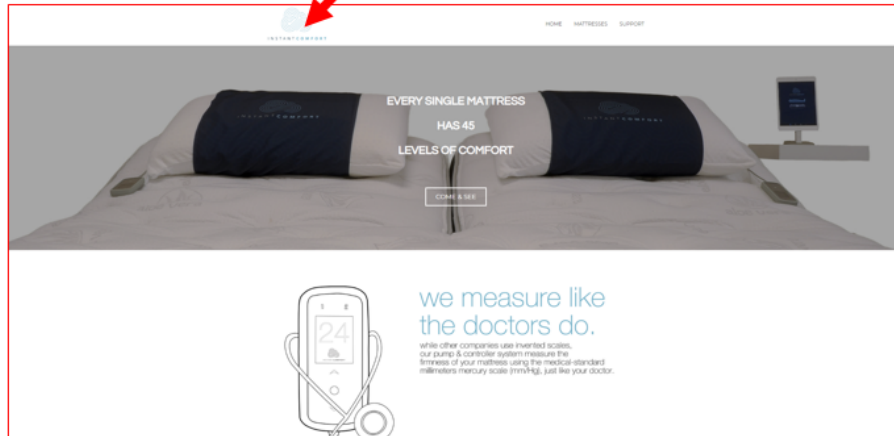
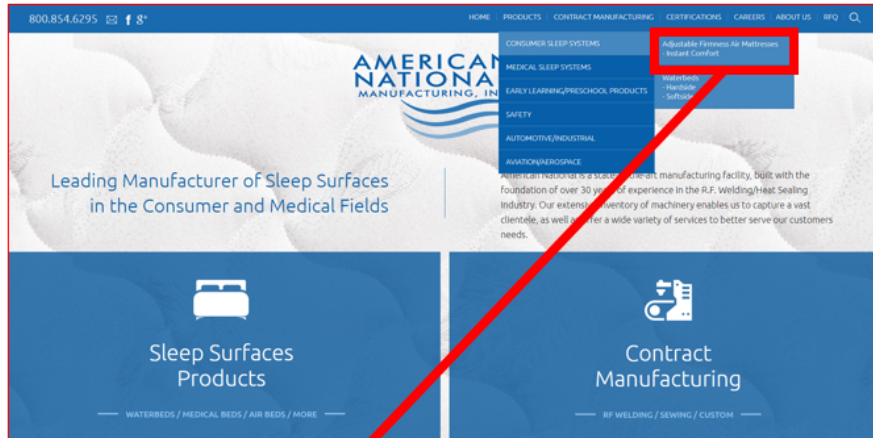
SIM LANGUAGE	INFRINGEMENT CONTENTIONS FOR ACCUSED PRODUCTS
	 <p data-bbox="388 1109 1549 1141">In addition, ANM website sends the user to “Instant Comfort” for consumer sleep systems.</p>

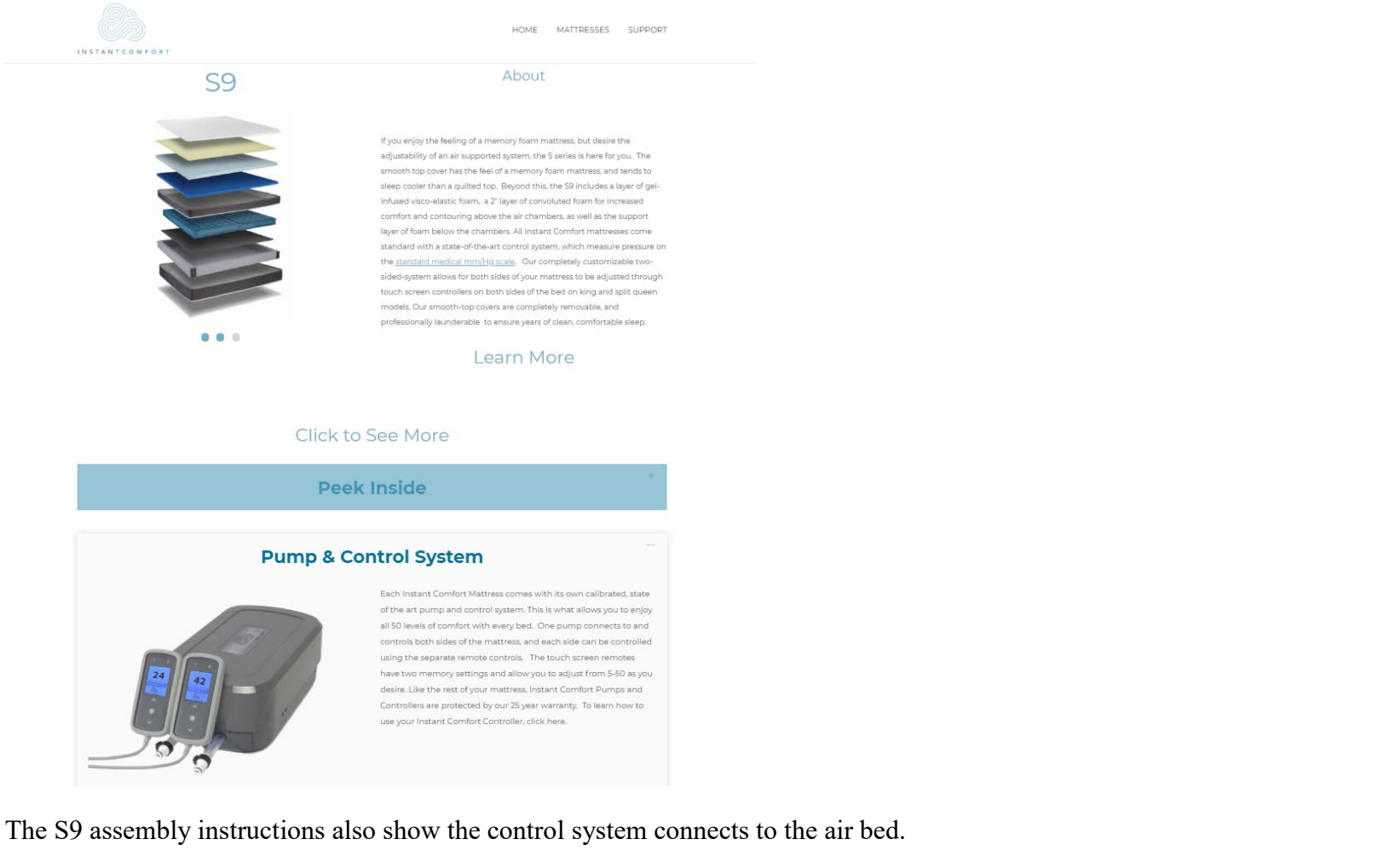
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AM LANGUAGE INFRINGEMENT CONTENTIONS FOR ACCUSED PRODUCTS



All of the mattresses include a Pump & Control System. For example, the S9 mattress includes a Pump & Control System.

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	 <p>The S9 assembly instructions also show the control system connects to the air bed.</p>

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