

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 case, Dkt. 137), Plaintiff provides the chart below identifying specifically where each element of each asserted claim of the ‘172 Patent is found within 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, November 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 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. 3-6(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 ELEMENT | INFRINGEMENT CONTENTIONS |
|---|--|
| <p>Claim 2</p> <p>[2.P] 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, 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> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <div data-bbox="676 337 1390 1052" data-label="Image"> </div> <div data-bbox="1486 824 1738 977" data-label="Text"> <p>Enclosure of Valve Enclosure Assembly</p> </div> <p data-bbox="676 1058 1045 1101">(Photograph of Gen 3 Arco)</p> <p data-bbox="676 1149 1957 1221">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:</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="680 990 976 1031">(Photograph of Gen X)</p> <p data-bbox="680 1079 1984 1185">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:</p> |

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

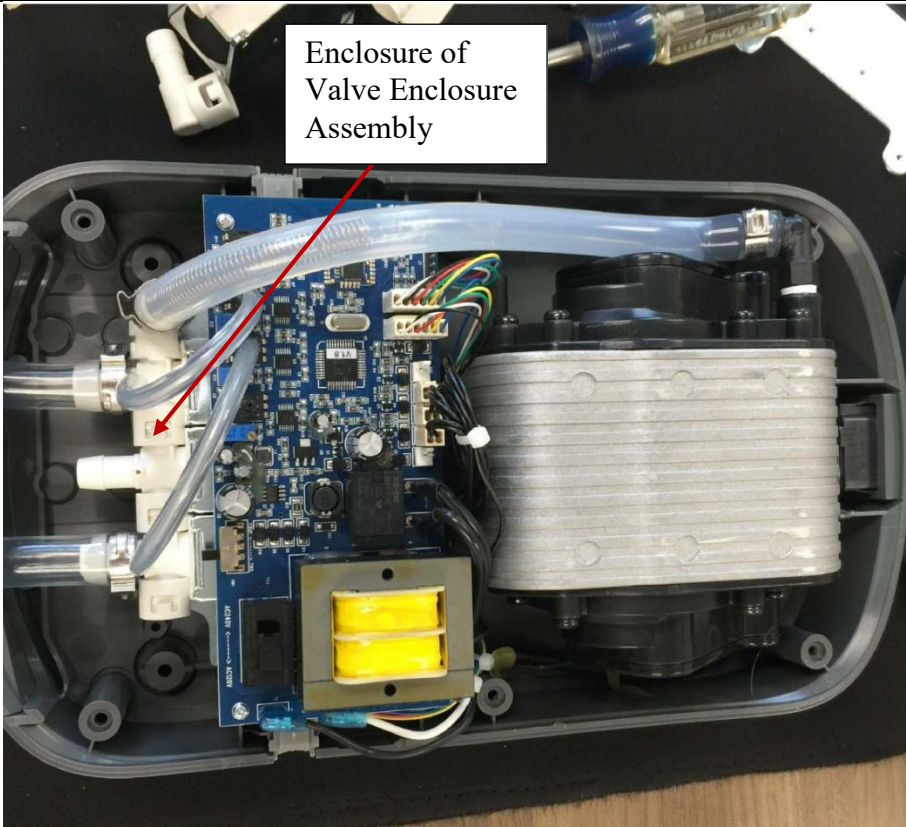
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="961 363 1222 500">Enclosure of Valve Enclosure Assembly</p> <p data-bbox="680 1172 1050 1205">(Photograph of Gen 3 Koge)</p> <p data-bbox="680 1260 1965 1367">The valve enclosure assemblies of the Gen 3 Arco, Gen X, 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.</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| |  <p data-bbox="1453 381 1722 474">Air Inflatable Mattress</p> <p data-bbox="682 868 997 1015">Air Controller containing the Valve Enclosure Assembly</p> |

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

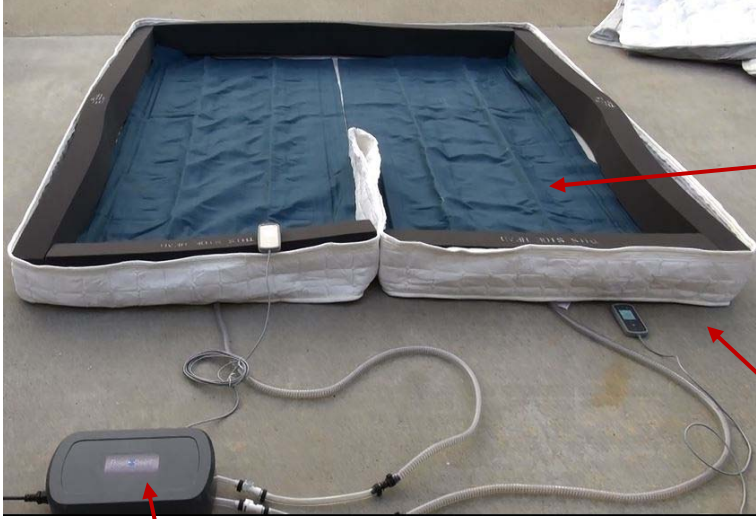
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>A photograph showing a blue inflatable mattress system. The mattress is laid out on a light-colored floor, with its air bladder visible. A black air controller unit is connected to the mattress via a grey hose. A red arrow points from the text box 'Air Bladder of Air Inflatable Mattress, which is inflatable by compressed air' to the blue bladder. Another red arrow points from the text box 'Air Inflatable Mattress' to the entire mattress assembly. A third red arrow points from the text box 'Air Controller containing the Valve Enclosure Assembly' to the black controller unit.</p> <p data-bbox="1499 386 1808 570">Air Bladder of Air Inflatable Mattress, which is inflatable by compressed air</p> <p data-bbox="1499 724 1766 818">Air Inflatable Mattress</p> <p data-bbox="747 886 1062 1029">Air Controller containing the Valve Enclosure Assembly</p> |

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

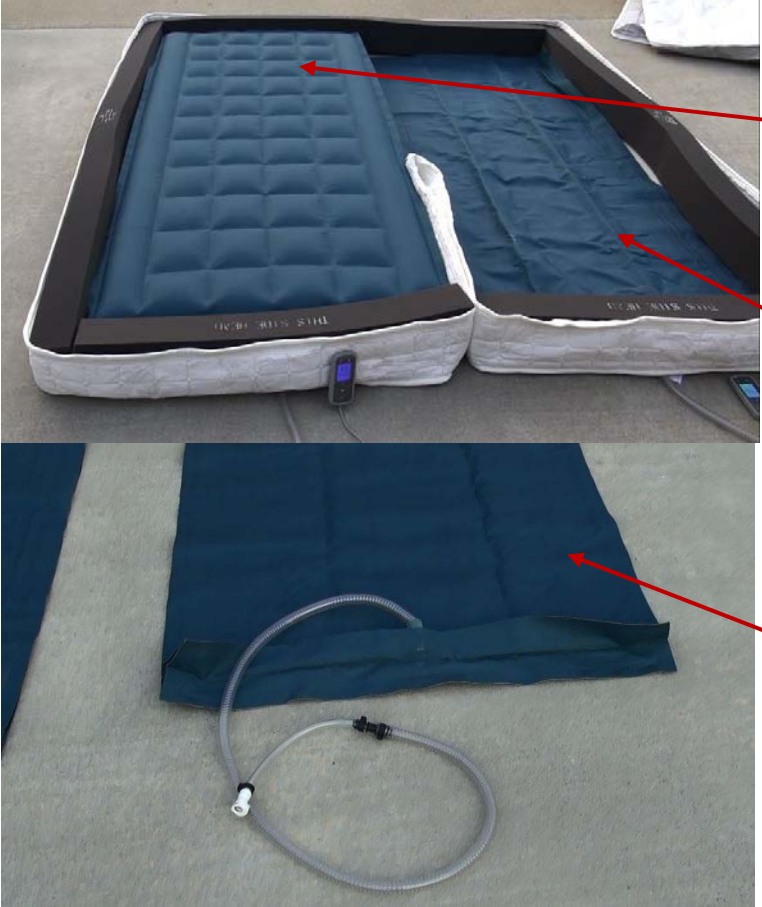
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="1470 357 1774 544">Air Bladder of Air Inflatable Mattress, inflated by compressed air</p> <p data-bbox="1470 568 1774 755">Air Bladder of Air Inflatable Mattress, deflated</p> <p data-bbox="1470 860 1785 1047">Air Bladder of Air Inflatable Mattress, which is inflatable by compressed air</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <div data-bbox="699 354 970 451" style="border: 1px solid black; padding: 5px; width: fit-content;">Air Inflatable Mattress</div> <div data-bbox="1627 378 1942 565" style="border: 1px solid black; padding: 5px; width: fit-content;">Bladders of Air Inflatable Mattress, which are inflatable by compressed air</div> <div data-bbox="1570 755 1885 901" style="border: 1px solid black; padding: 5px; width: fit-content;">Air Controller containing the Valve Enclosure Assembly</div>  <p data-bbox="678 1011 1249 1044">(Photograph of medical air mattress system)</p> <p data-bbox="678 1101 1969 1421">In the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers, the pump is fluidly coupled to the at least one air bladder for providing compressed air thereto. In the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers, the improved valve enclosure assembly is fluidly coupled intermediate the pump and the at least one air bladder for controlling the inflation of the at least one air bladder. As shown in the photographs below, the pump is fluidly coupled to the enclosure of the valve enclosure assembly via tubing. The enclosure of the valve enclosure assembly is then similarly fluidly coupled to the at least one air bladder with tubing. The pump provides compressed air to the at least one air bladder via the tubing between the pump and the enclosure of the valve enclosure assembly and the tubing between the valve enclosure assembly and the air bladder.</p> |

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

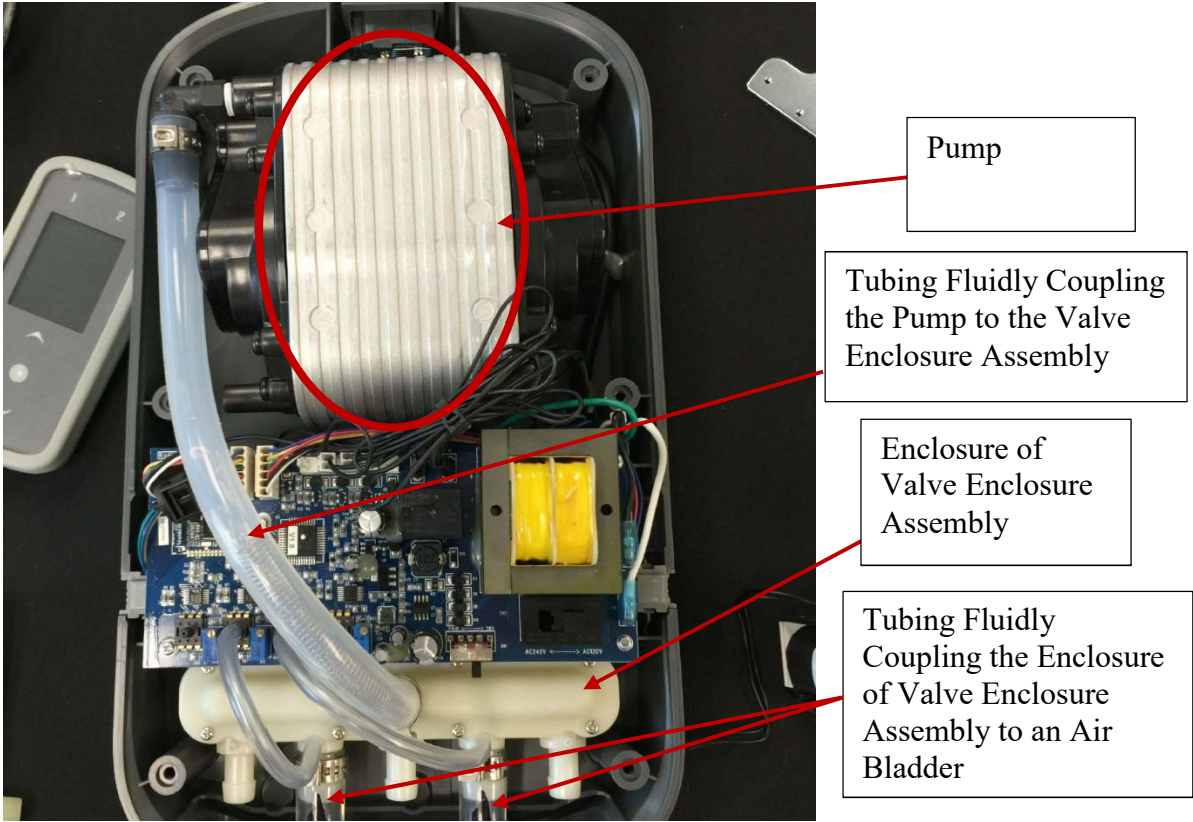
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <p>Gen 3 Arco:</p>  <p>(Photograph of Gen 3 Arco)</p> |

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

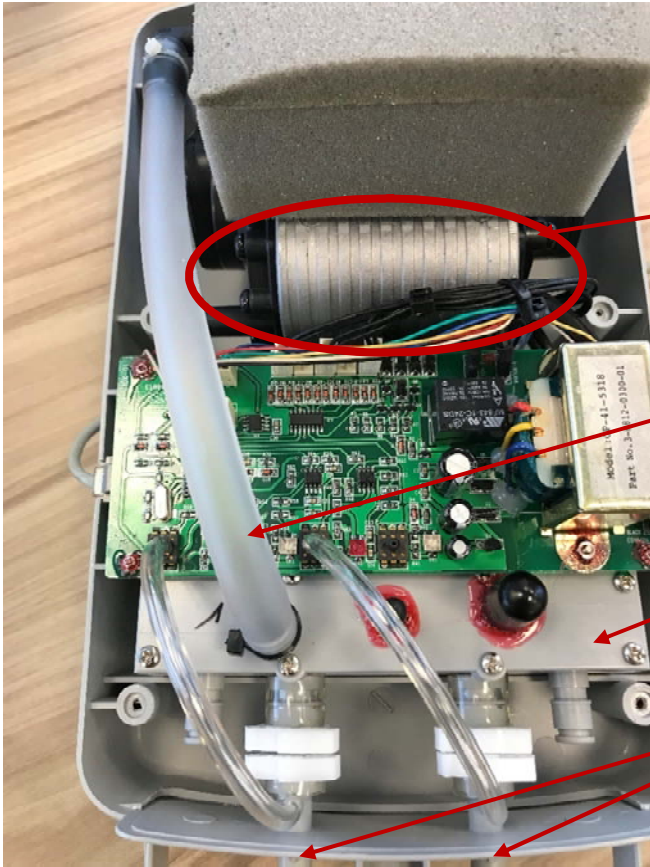
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen X:</p>  <p>(Photograph of Gen X)</p> |

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

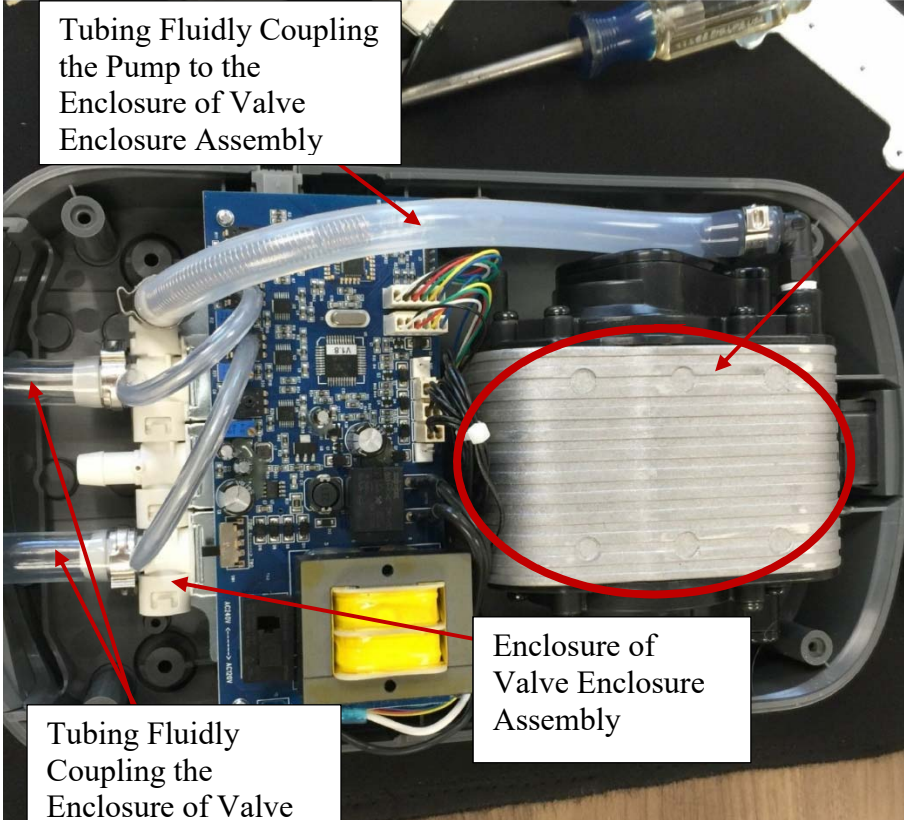
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen 3 Koge:</p>  <p>(Photograph of Gen 3 Koge)</p> |

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

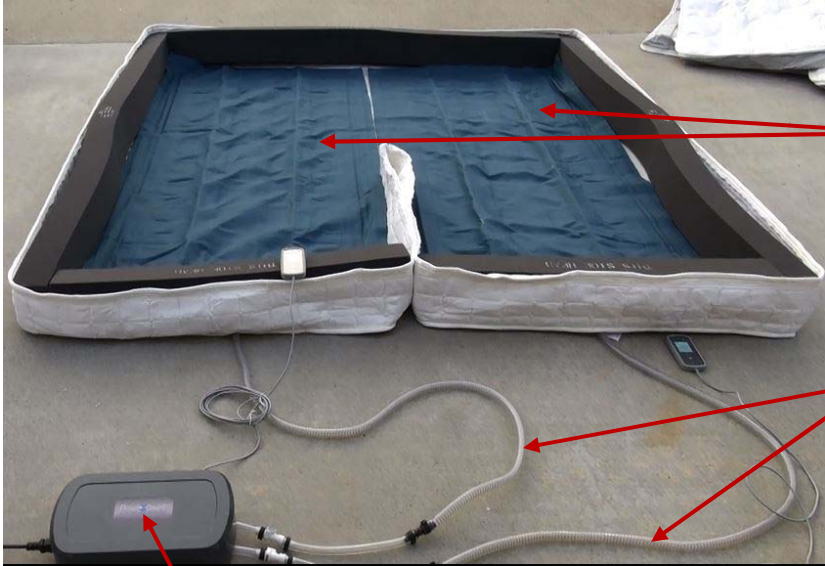
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>As shown in the example of a Gen 3 air controller being used with an inflatable air mattress, the two tubes that fluidly couple to the valve enclosure assembly fluidly couple to the air bladders of the inflatable air mattress. Because the pump is fluidly coupled to the air bladder, the air bladders inflate using the compressed air from the pump.</p>  <div data-bbox="1562 521 1877 708" style="border: 1px solid black; padding: 5px;"> <p>Air Bladders of Air Inflatable Mattress, which are inflated using compressed air</p> </div> <div data-bbox="1541 753 1848 940" style="border: 1px solid black; padding: 5px;"> <p>Tubing Fluidly Coupling the Valve Enclosure Assembly to an Air Bladder</p> </div> <div data-bbox="781 1068 1096 1211" style="border: 1px solid black; padding: 5px;"> <p>Air Controller containing the Valve Enclosure Assembly</p> </div> <p>In the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers, a processor provides commands to the improved valve enclosure assembly during an inflate/deflate cycle:</p> |

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

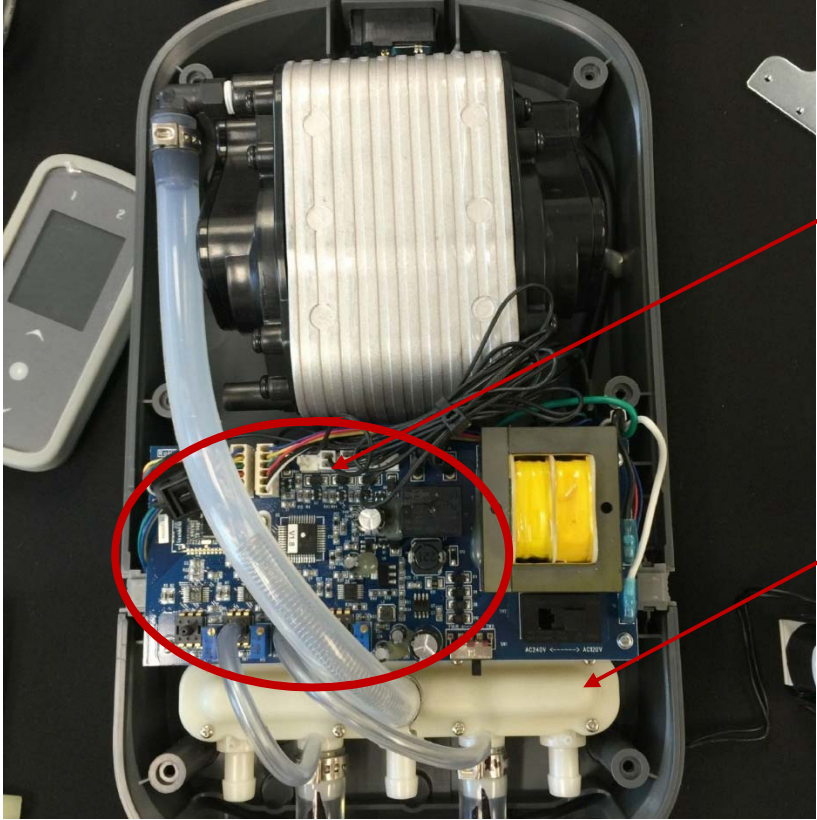
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen 3 Arco:</p>  <p>Printed Circuit Board for Processor, which provides commands to the improved valve enclosure assembly during an inflate/deflate cycle</p> <p>Enclosure of Valve Enclosure Assembly</p> <p>(Photograph of Gen 3 Arco)</p> |

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

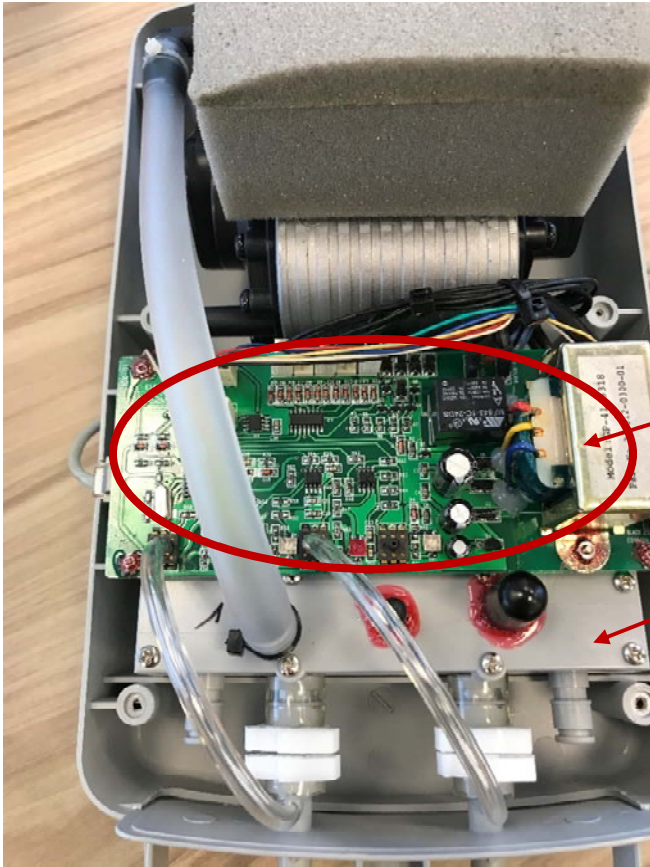
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <p>Gen X:</p>  <p>(Photograph of Gen X)</p> <div data-bbox="1486 526 1864 776" style="border: 1px solid black; padding: 5px;"> <p>Printed Circuit Board for Processor, which provides commands to the improved valve enclosure assembly during an inflate/deflate cycle</p> </div> <div data-bbox="1541 797 1812 943" style="border: 1px solid black; padding: 5px;"> <p>Enclosure of Valve Enclosure Assembly</p> </div> |

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

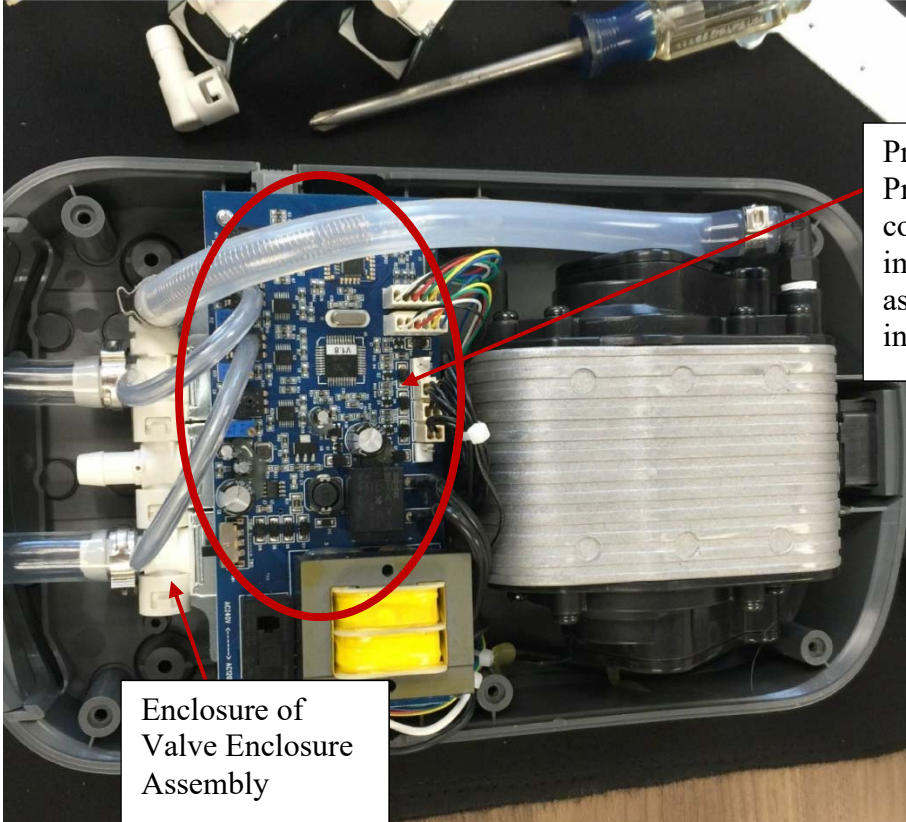
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <p>Gen 3 Koge:</p>  <p>Printed Circuit Board for Processor, which provides commands to the improved valve enclosure assembly during an inflate/deflate cycle</p> <p>Enclosure of Valve Enclosure Assembly</p> <p>(Photograph of Gen 3 Koge)</p> <p>Versions 1.8, 1.97, and 2.0 of ANM's source code further demonstrate that the Gen 3 Accused Products include a processor for providing commands to the improved valve enclosure assembly during an inflate/deflate cycle.</p> |

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

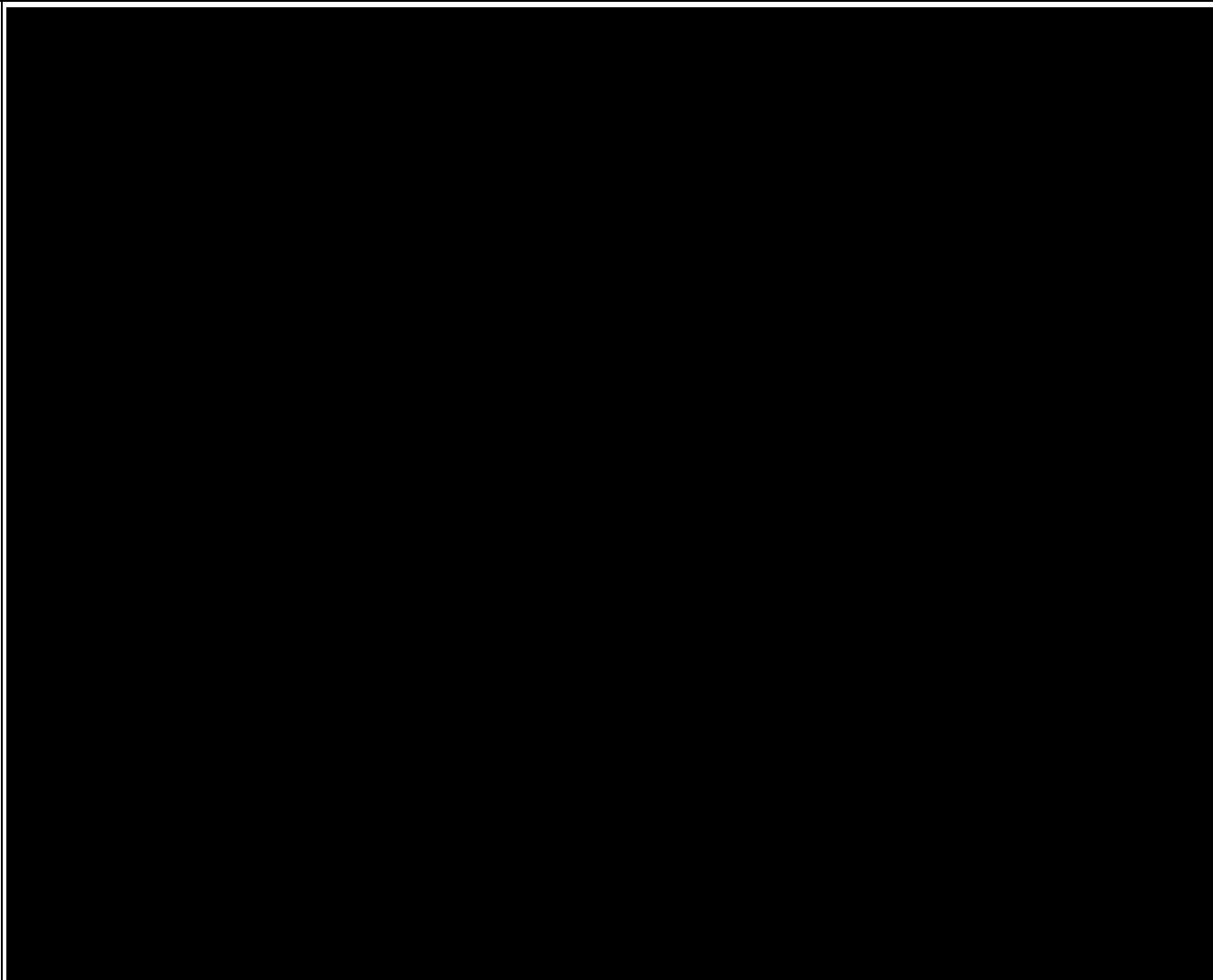
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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EXHIBIT A1 - U.S. PATENT NO. 5,904,172 VERSUS AMERICAN NATIONAL MANUFACTURING ACCUSED PRODUCTS

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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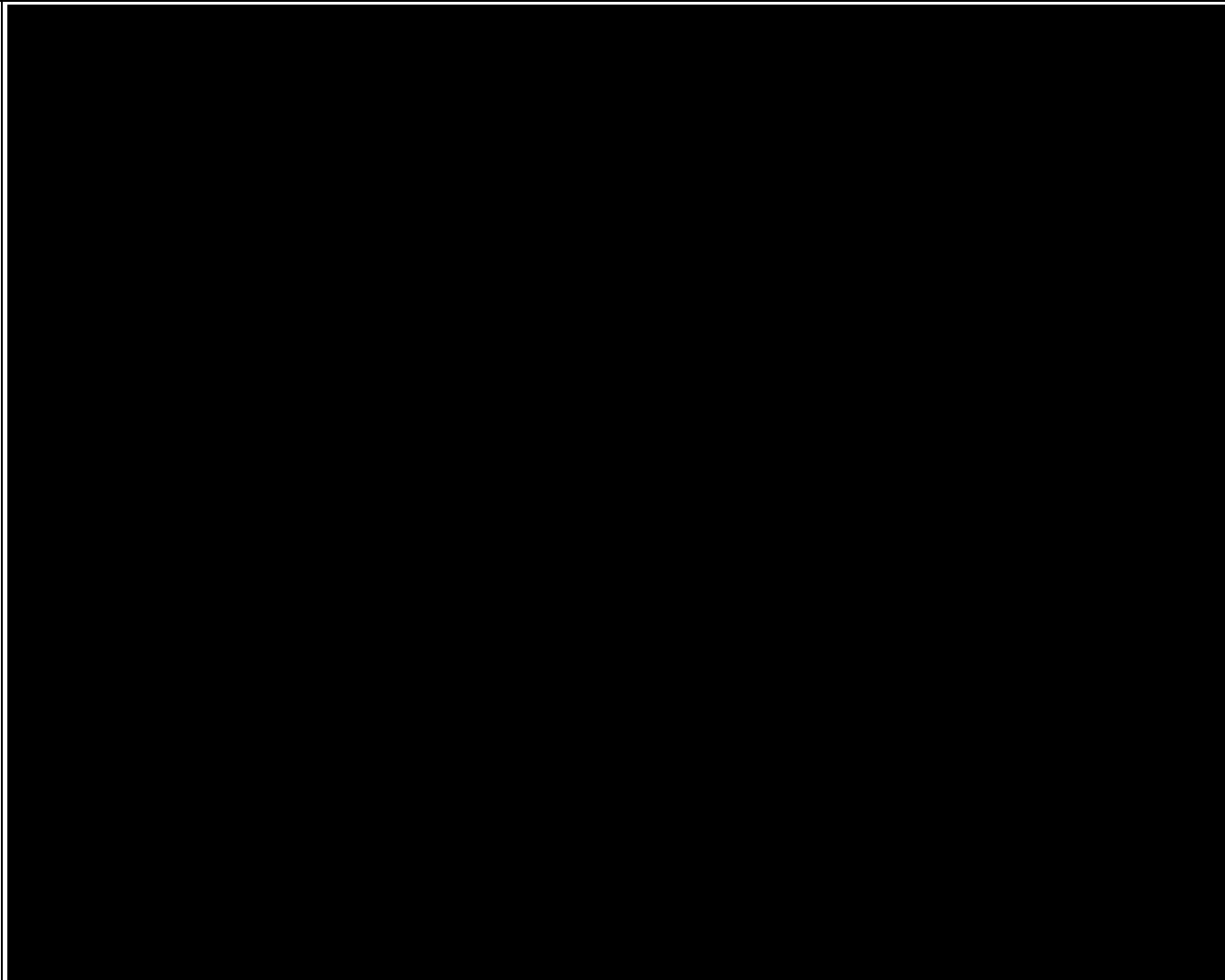
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| |  The content of the table is redacted with a solid black fill. |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <div data-bbox="674 342 1999 1170" style="background-color: black; width: 100%; height: 510px; margin-bottom: 10px;"></div> <p data-bbox="674 1203 1976 1416">This limitation may further implicate other electronics, software, firmware, and/or source code of the Accused Products. Additional Source Code for the Accused Products may further show how this claim limitation is met. To resolve a dispute regarding Plaintiff's Notice of Inspection for Source Code, the parties have agreed that Plaintiff shall be allowed to inspect remaining Source Code for the Accused Products on mutually agreeable date(s), after which Plaintiff shall supplement its infringement contentions, pursuant to an agreed-upon timeline and without opposition, using the</p> |

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

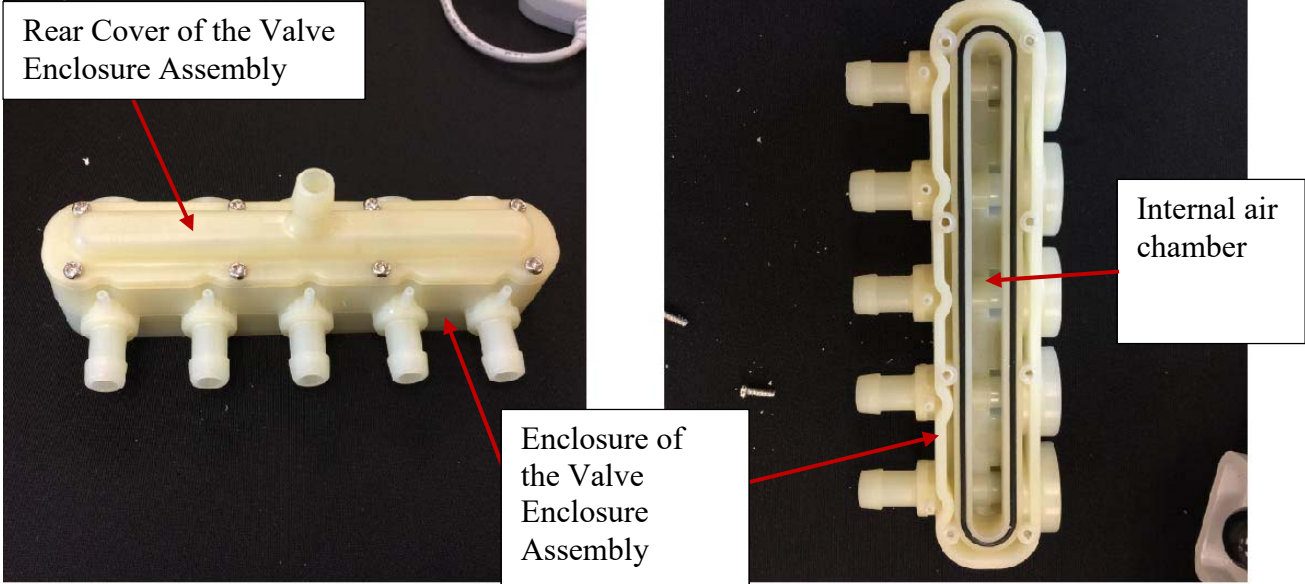
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>information learned during the inspection.</p> <p>Even under Defendants’ construction from the ITC proceeding, where a “valve enclosure assembly” means “an enclosure and a rear cover defining an internal, pressurized air chamber enclosing a valve,” ANM’s Gen 3 or Gen X air controllers meet this claim limitation.</p> <p>As seen in the photographs below, the enclosure of the Gen 3 Arco’s valve enclosure assembly is comprised of an enclosure and a rear cover.</p>  <p style="text-align: center;">(Photograph of the Gen 3 Arco)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | Furthermore, as seen in the photograph below showing a side perspective view of the Gen 3 Arco's enclosure, the Gen 3 Arco the internal chamber is shown enclosing a valve. |

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

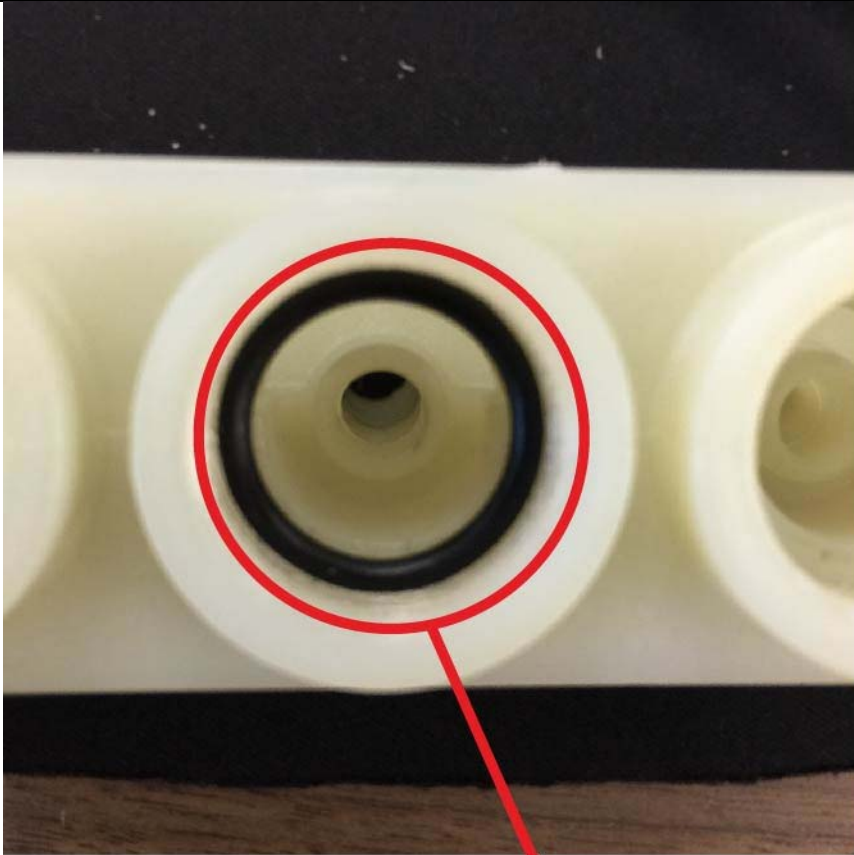
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="829 1295 1656 1365">Perspective view of the internal chamber enclosing a valve</p> <p data-bbox="680 1372 1041 1404">(Photograph of Gen 3 Arco)</p> |

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

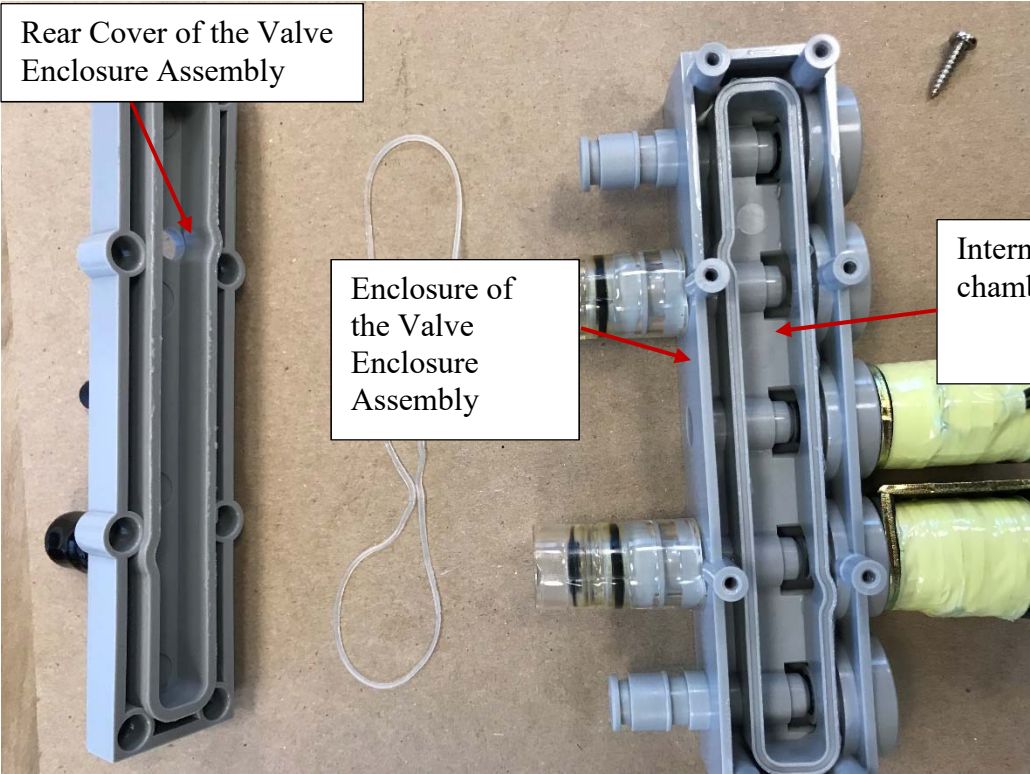
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>As seen in the photographs below, the enclosure of the Gen X's valve enclosure assembly is comprised of an enclosure and a rear cover.</p>  <p>(Photograph of the Gen 3 Arco)</p> <p>Furthermore, as seen in the photograph below showing a side perspective view of the Gen 3 Arco's enclosure, the Gen 3 Arco the internal chamber is shown enclosing a valve.</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| |  <p data-bbox="1444 743 1692 951">Internal Chamber Enclosing a Valve</p> <p data-bbox="680 1289 1041 1321">(Photograph of Gen 3 Arco)</p> |

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

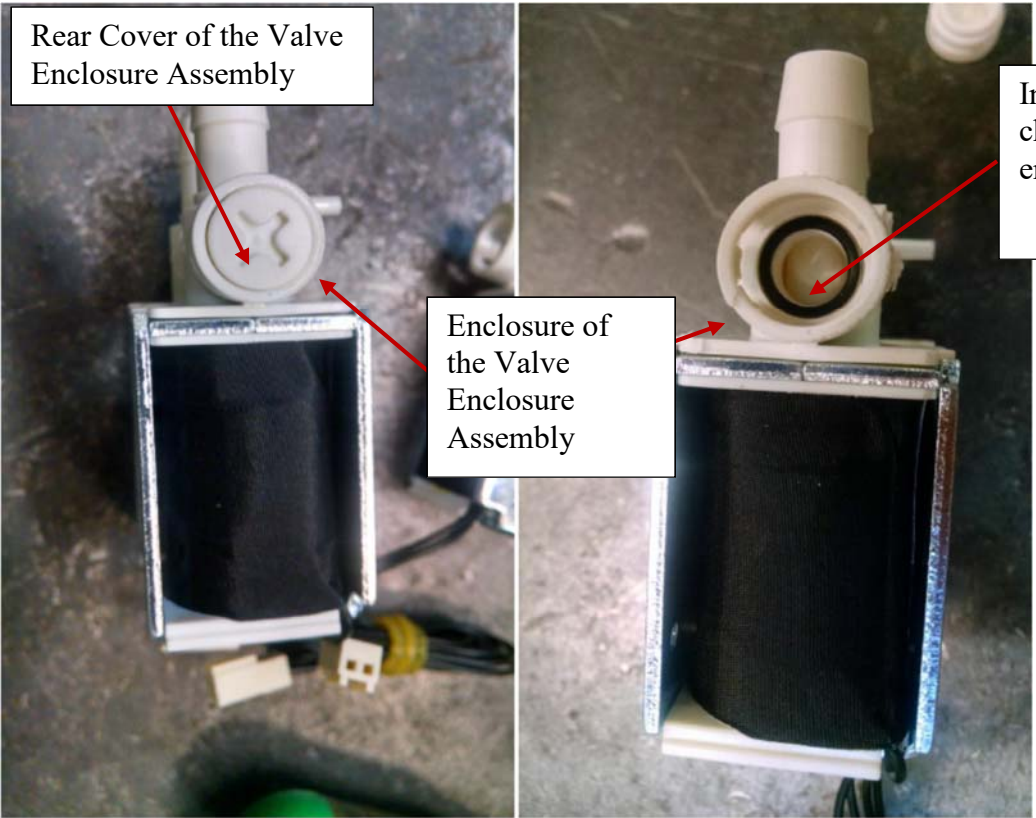
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>As seen in the photographs below, the enclosure of the Gen 3 Koge's valve enclosure assembly is comprised of an enclosure and a rear cover. The valve seal is contained within the enclosure, which shows how the enclosure and rear cover define an internal air chamber enclosing a valve.</p>  <p data-bbox="693 462 1050 560">Rear Cover of the Valve Enclosure Assembly</p> <p data-bbox="1102 747 1354 925">Enclosure of the Valve Enclosure Assembly</p> <p data-bbox="1669 519 1953 706">Internal air chamber enclosing a valve</p> <p data-bbox="850 1282 1029 1323">Enclosure</p> <p data-bbox="1218 1274 1690 1364">Enclosure with Rear Cover Removed</p> <p data-bbox="682 1380 1092 1412">(Photograph of the Gen 3 Koge)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| <p>[2.1] an enclosure defining a substantially fluidly sealed air chamber and having at least one air inlet to the air chamber being fluidly coupled to the pump, a plurality of guides and stops being disposed within the enclosure for correctly positioning components within the enclosure; and</p> | <p>Under the plain and ordinary meaning of the claim terms in light of the specification, the Gen 3 Arco, Gen X, and Gen 3 Koge Air Controllers include an enclosure defining a substantially fluidly sealed air chamber and having at least one air inlet to the air chamber being fluidly coupled to the pump, a plurality of guides and stops being disposed within the enclosure for correctly positioning components within the enclosure.</p> <p>The Gen 3 Arco air controller includes an enclosure defining a substantially fluidly sealed air chamber that has at least one air inlet to the air chamber, which is fluidly coupled to the pump.</p> |

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

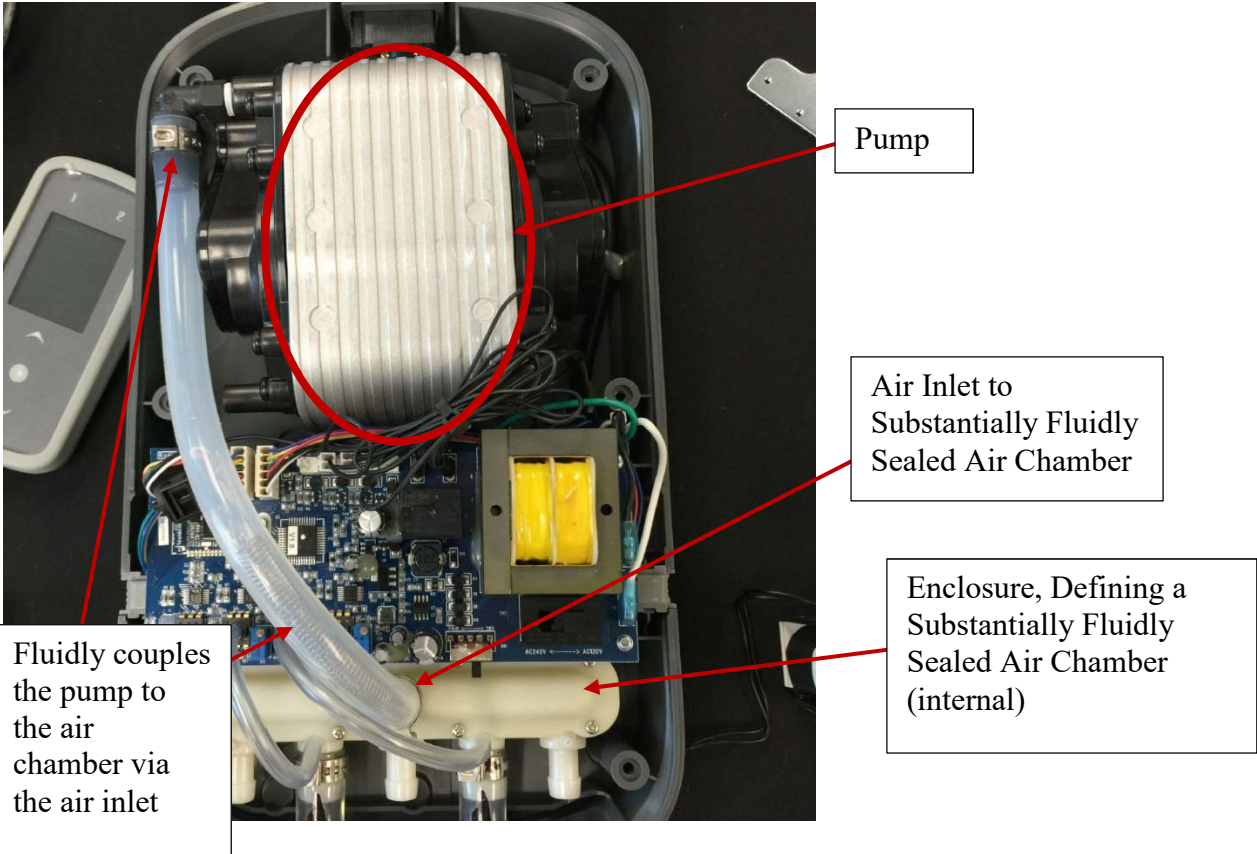
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen 3 Arco:</p>  <p>(Photograph of Gen 3 Arco)</p> <p>As seen in the photograph above, tubing connects the pump to the enclosure and to the air inlet to the air chamber of the enclosure. That is, the air inlet to the air chamber is fluidly coupled to the pump.</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1241 813 1419 862">Air Inlet</p> <p data-bbox="1539 521 1906 711">Enclosure, which defines a Substantially Fluidly Sealed Air Chamber</p> <p data-bbox="680 1089 1041 1122">(Photograph of Gen 3 Arco)</p> |

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

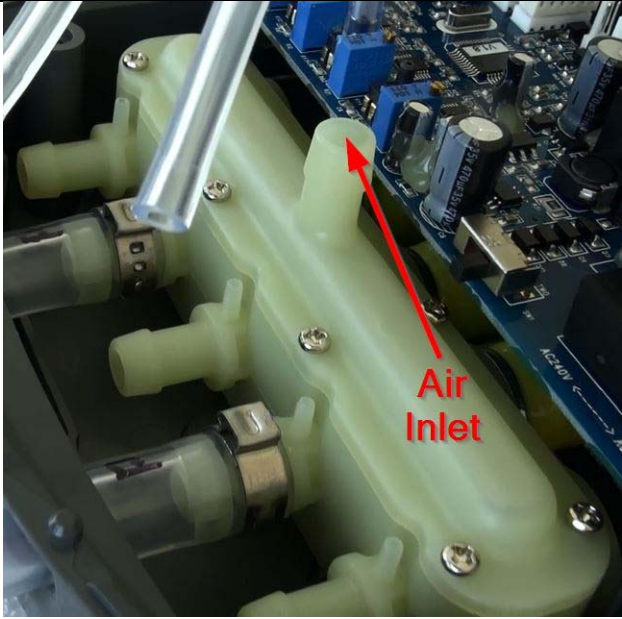
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photograph of Gen 3 Arco)</p> <p>As further seen from the photographs below, the enclosure defines an air chamber. The air chamber includes one or more O-rings, which assist in substantially fluidly sealing the air chamber.</p> |

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

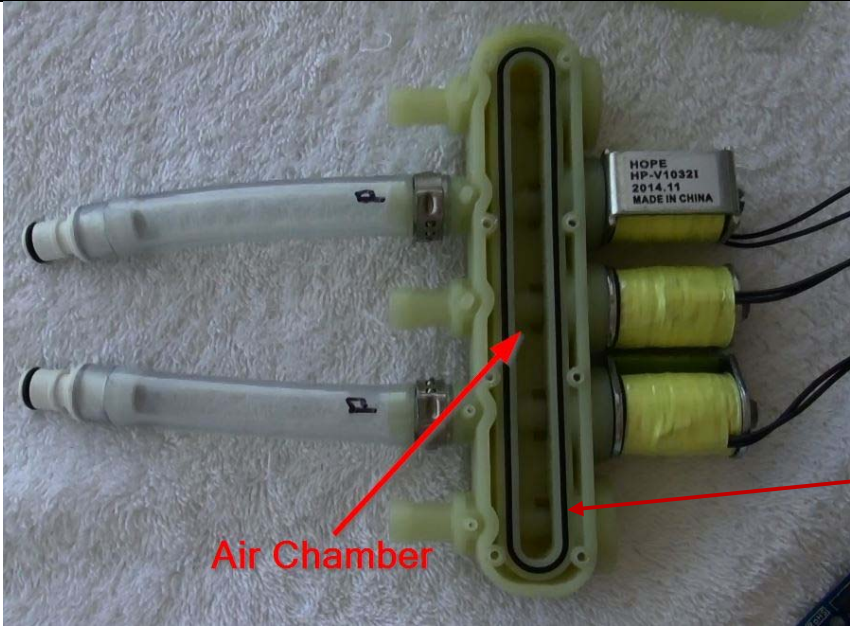
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="680 971 1871 1040">(Photograph of Gen 3 Arco's enclosure (depicted with the rear-cover removed for illustrative purposes).)</p> |

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

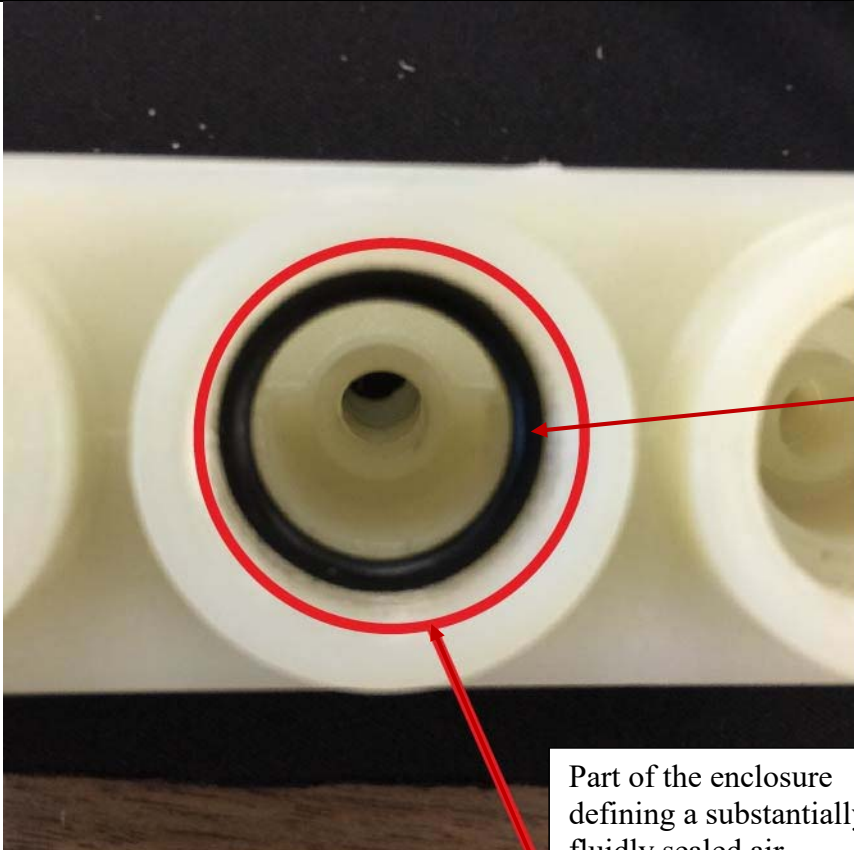
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1549 638 1917 829">O-ring, which assists in substantially fluidly sealing the air chamber</p> <p data-bbox="1224 1081 1591 1239">Part of the enclosure defining a substantially fluidly sealed air chamber</p> <p data-bbox="680 1284 1654 1320">(Photograph of Gen 3 Arco's enclosure (depicted with solenoids removed).)</p> |

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

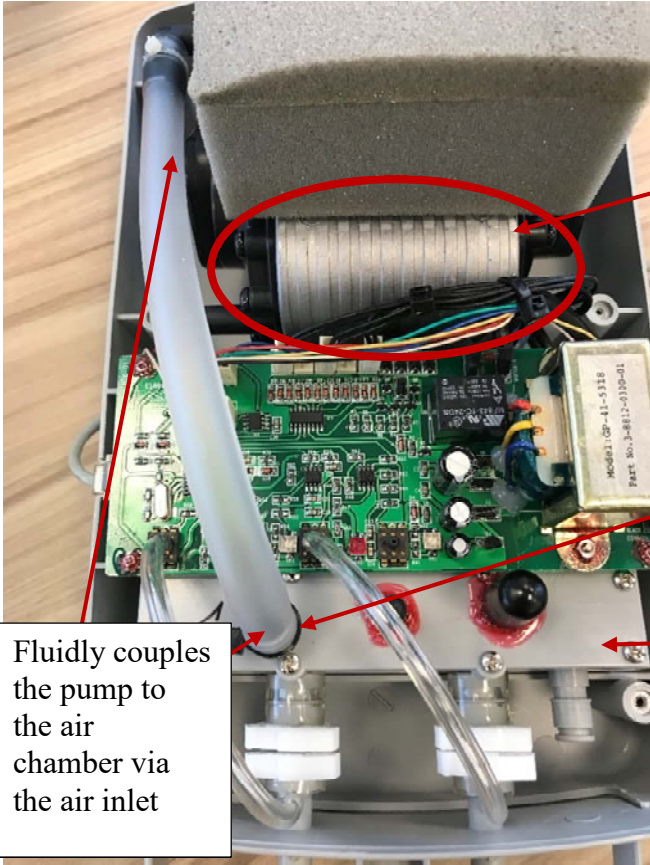
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>The Accused Products having a Gen X air controller include an enclosure defining a substantially fluidly sealed air chamber that has at least one air inlet to the air chamber, which is fluidly coupled to the pump.</p> <p>Gen X:</p>  <p>(Photograph of Gen X)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>As seen in the photograph above, tubing connects the pump to the enclosure and to the air inlet to the air chamber of the enclosure. That is, the air inlet to the air chamber is fluidly coupled to the pump.</p> <div data-bbox="676 506 1251 1269" data-label="Image"> </div> <div data-bbox="1419 545 1780 734" data-label="Text"> <p>Air Inlet to Substantially Fluidly Sealed Air Chamber of the Enclosure</p> </div> <p>(Photograph of Gen X)</p> |

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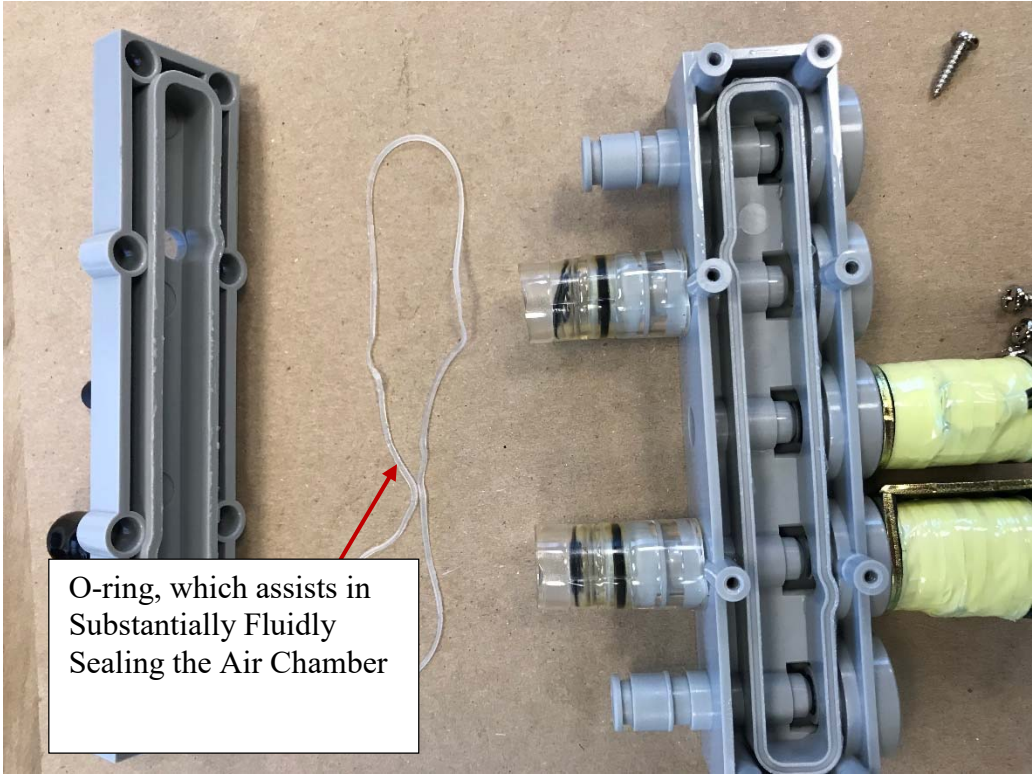
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>As further seen from the photographs below, the enclosure defines an air chamber. The air chamber includes one or more O-rings, which assist in substantially fluidly sealing the air chamber.</p>  <p>O-ring, which assists in Substantially Fluidly Sealing the Air Chamber</p> <p>(Photograph of Gen X's enclosure (depicted with the rear-cover and O-ring disassembled for illustrative purposes).)</p> |

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

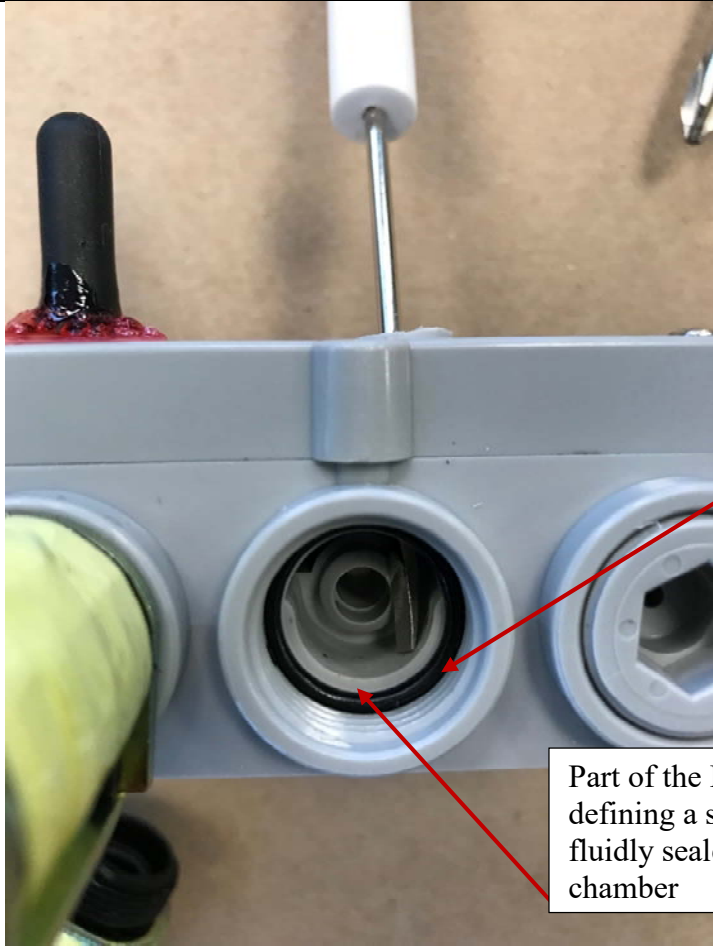
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>O-ring, which assists in substantially fluidly sealing the air chamber</p> <p>Part of the Enclosure defining a substantially fluidly sealed air chamber</p> <p>(Photograph of Gen X's enclosure (depicted with solenoids removed).)</p> |

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

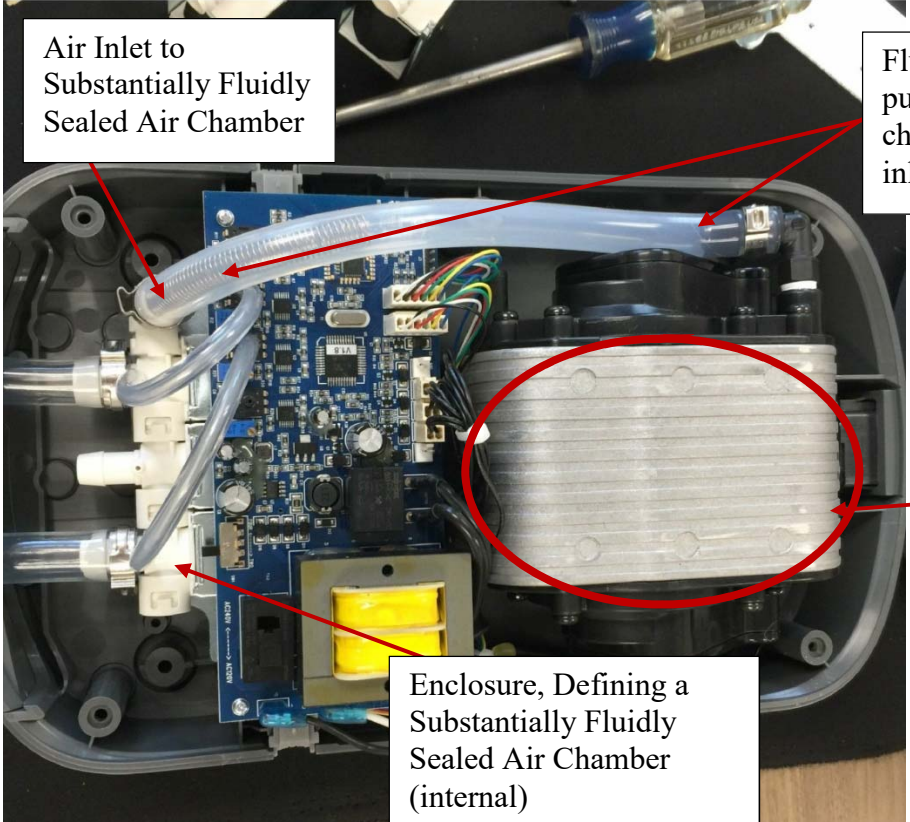
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The Accused Products having a Gen 3 Koge air controller include an enclosure defining a substantially fluidly sealed air chamber that has at least one air inlet to the air chamber, which is fluidly coupled to the pump.</p> <p>Gen 3 Koge:</p>  <p>(Photograph of Gen 3 Koge)</p> |

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

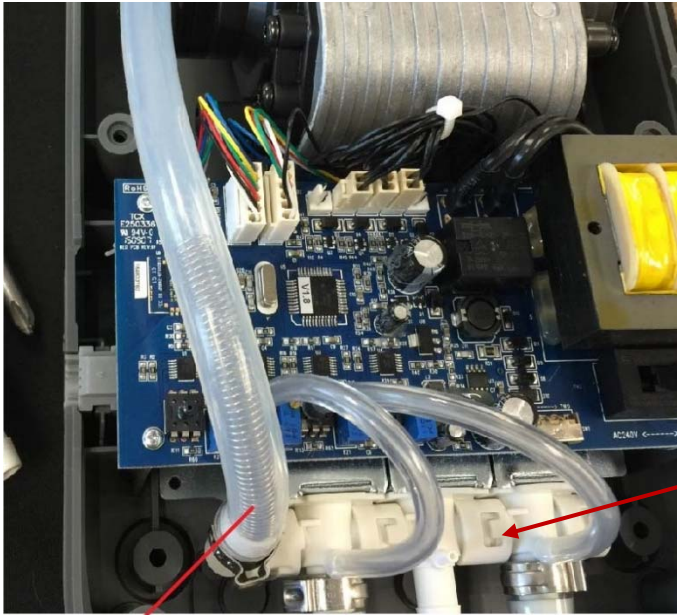
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>As seen in the photograph above, tubing connects the pump to the enclosure and to the air inlet to the air chamber of the enclosure. That is, the air inlet to the air chamber is fluidly coupled to the pump.</p>  <p data-bbox="1388 760 1757 954">Enclosure, which defines a Substantially Fluidly Sealed Air Chamber</p> <p data-bbox="688 1084 1073 1230">Inlet to substantially fluidly sealed enclosure</p> <p data-bbox="680 1252 1052 1284">(Photograph of Gen 3 Koge)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>As further seen from the photographs below, the enclosure defines an air chamber. The air chamber includes one or more interlocking connectors, which assist in substantially fluidly sealing the air chamber.</p> <div data-bbox="678 500 1480 1299" data-label="Image"> <p>The photograph shows a close-up of a device's internal components. Three solenoid valves are mounted on a white plastic manifold. The valves are labeled 'KSV4WD-24A-3A', 'DC 24V', and 'KOGÉ 160108C'. Clear plastic tubing is connected to the manifold. Two red arrows point from text boxes to the interlocking connectors on the manifold. One arrow points to the text 'Interlocking connectors' and the other points to the text 'Enclosure defining Substantially Fluidly Sealing the Air Chamber'.</p> </div> <p>(Photograph of Gen 3 Koge)</p> |

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

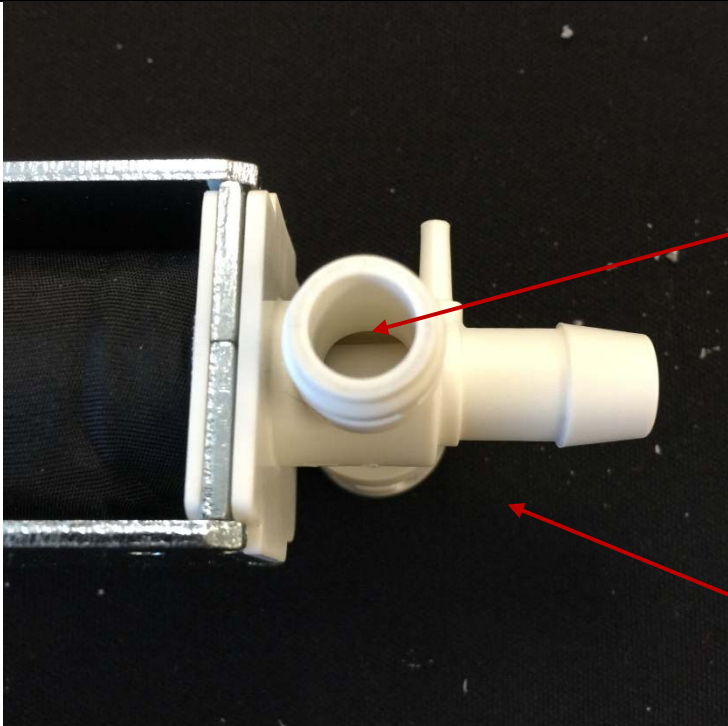
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="1438 474 1818 620">Substantially Fluidly Sealed Air Chamber</p> <p data-bbox="1493 911 1755 1029">Enclosure</p> <p data-bbox="680 1068 1902 1105">(Photograph of Gen 3 Koge’s enclosure (depicted detached from other enclosure components).)</p> <p data-bbox="680 1159 1990 1409">When the Gen 3 and Gen X air controllers inflate the one or more air bladders, the pump, tubing that connects the pump to the air inlet, air chamber, and tubing connecting the air chamber to the one or more air bladders creates a substantially fluidly sealed environment substantially fluidly sealing the air chamber. That is, the enclosure contains several fluid tight seals and the tubing connecting the air bladders and pump to the enclosure creates a fluidly sealed environment such that the air chamber defined by the enclosure is substantially fluidly sealed. To the extent this limitation is not literally present the limitation is met under the doctrine of equivalents because the substantially fluidly sealed</p> |

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

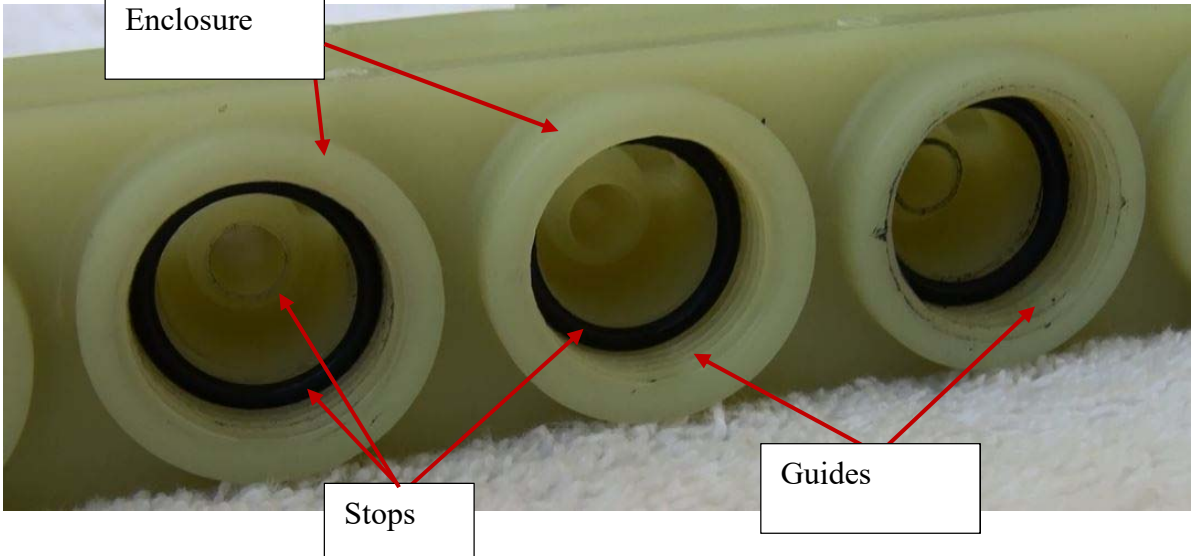
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>environment performs substantially the same function as a substantially sealed air chamber in substantially the same way and to obtain the substantially same result. Accordingly, the air chamber defined by the enclosure meets the substantially fluidly sealed limitation.</p> <p>The Accused Products having a Gen 3 Arco air controller include a plurality of guides and stops disposed within the enclosure for correctly positioning components within the enclosure. Specifically, the enclosure of the Gen 3 Arco includes threaded guides or guide walls within the enclosure for correctly positioning solenoid components within the enclosure. The enclosure of the Gen 3 Arco further includes a raised valve seat, ledge, and/or O-ring to stop the component at the correct position within the enclosure.</p>  <p>(Photograph of Gen 3 Arco)</p> |

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

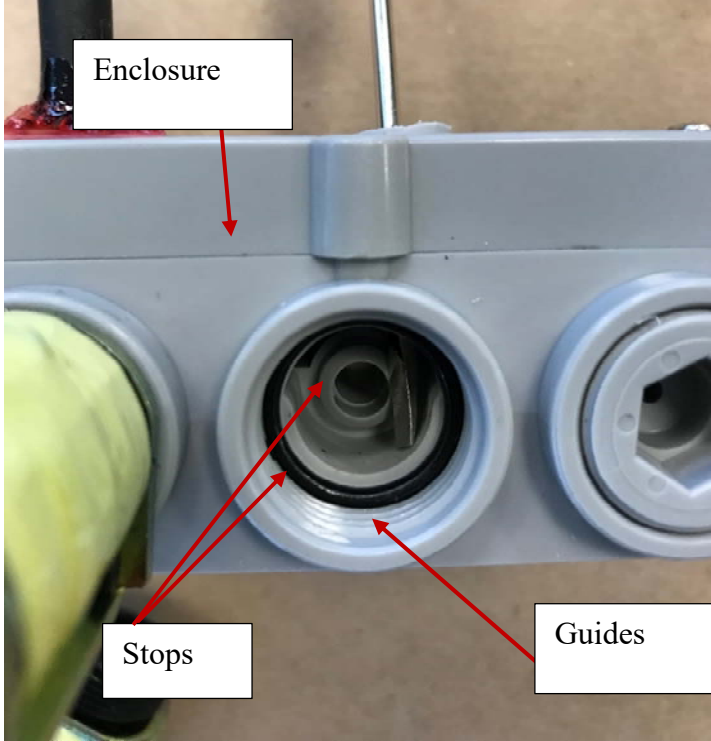
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>The Accused Products having a Gen X air controller include a plurality of guides and stops disposed within the enclosure for correctly positioning solenoid components within the enclosure and a raised valve seat, ledge, and/or O-ring to stop the solenoid component(s) at the correct position within the enclosure.</p>  <p>(Photograph of Gen X)</p> |

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

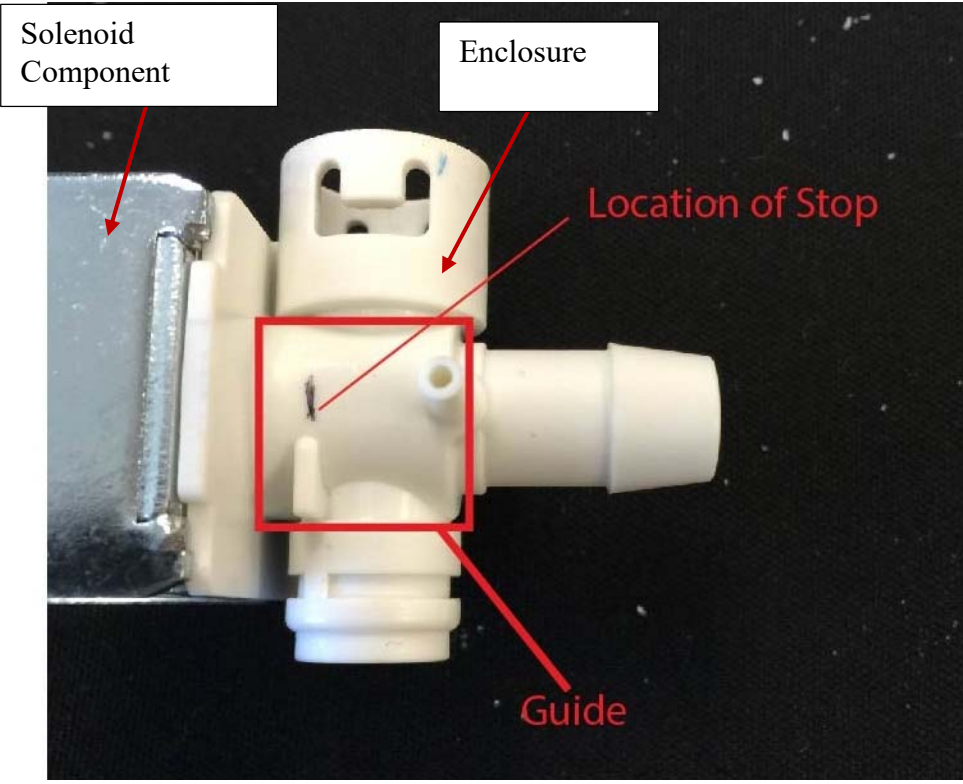
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>The Accused Products having a Gen 3 Koge air controller include a plurality of guides and stops disposed within the enclosure for correctly positioning components within the enclosure. Specifically, the enclosure of the Gen 3 Koge includes guiding walls within the enclosure for correctly positioning components within the enclosure. The solenoid component extends into the enclosure until it intersects with a stop, i.e., a raised fitting, valve seat, or ledge, etc. within the enclosure to create a seal.</p>  <p>(Photograph of Gen 3 Koge)</p> |

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

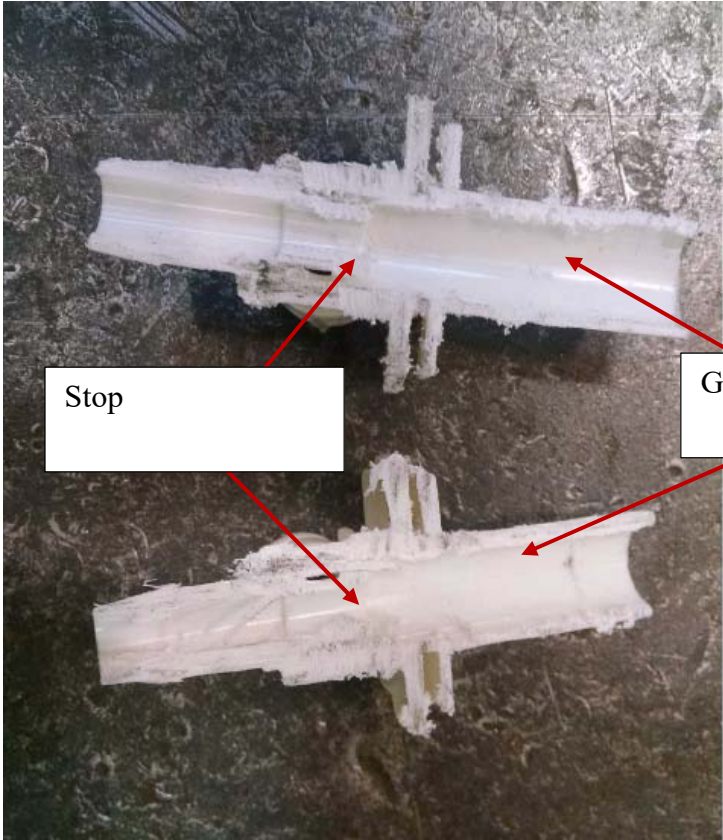
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The guiding wall guide and raised ledge stop can be further seen in the photograph below of a cross section of the enclosure of the enclosure assembly.</p>  <p>Even under Defendants' constructions from the ITC proceeding, where a "guide" would be construed as "structures formed on the inner surface of the bottom of the enclosure to laterally position internal components," and a "stop" would be construed as "structures formed on the inner surface of the</p> |

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

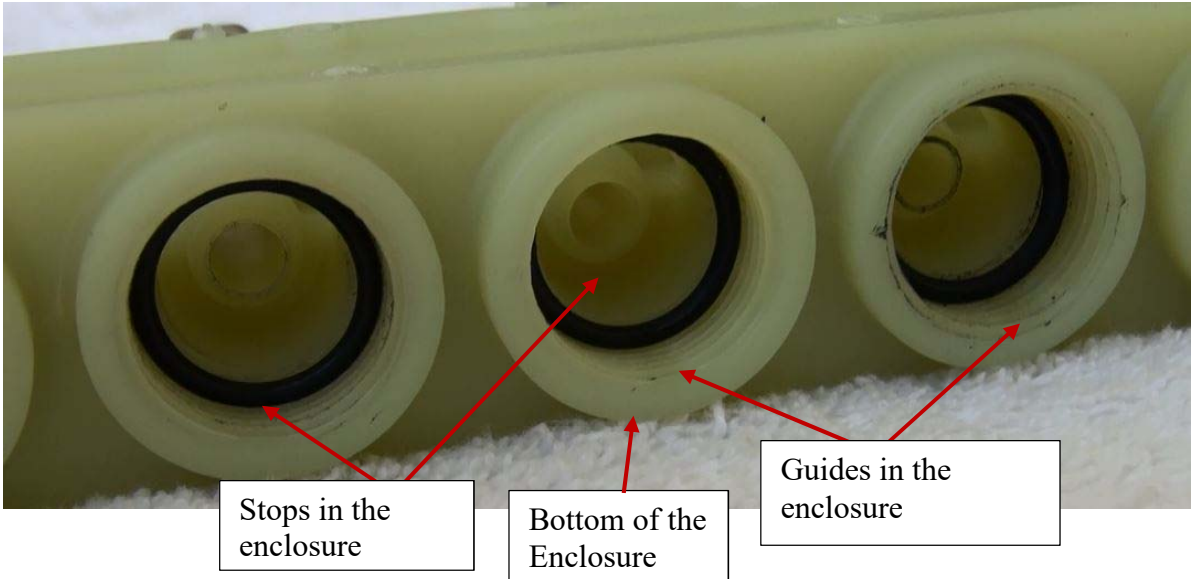
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>bottom of the enclosure to limit the travel of internal components,” ANM’s Gen 3 or Gen X air controllers meet this claim limitation.</p> <p>The enclosure of the Gen 3 Arco includes threaded guides to laterally position internal solenoid components. The enclosure of the Gen 3 Arco further includes a raised valve seat, ledge, and/or O-ring to limit travel of solenoid components. The enclosure further includes a plastic structure formed on the inner surface of the bottom of the enclosure to limit travel of internal components.</p>  <p>(Photograph of Gen 3 Arco)</p> <p>The enclosure of the Gen X includes threaded guides to laterally position internal solenoid components. The enclosure of the Gen X further includes a raised valve seat, ledge, and/or O-ring to</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>limit travel of solenoid components. The enclosure further includes a plastic structure formed on the inner surface of the bottom of the enclosure to limit travel of internal components.</p> <p>(Photograph of Gen X)</p> |

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

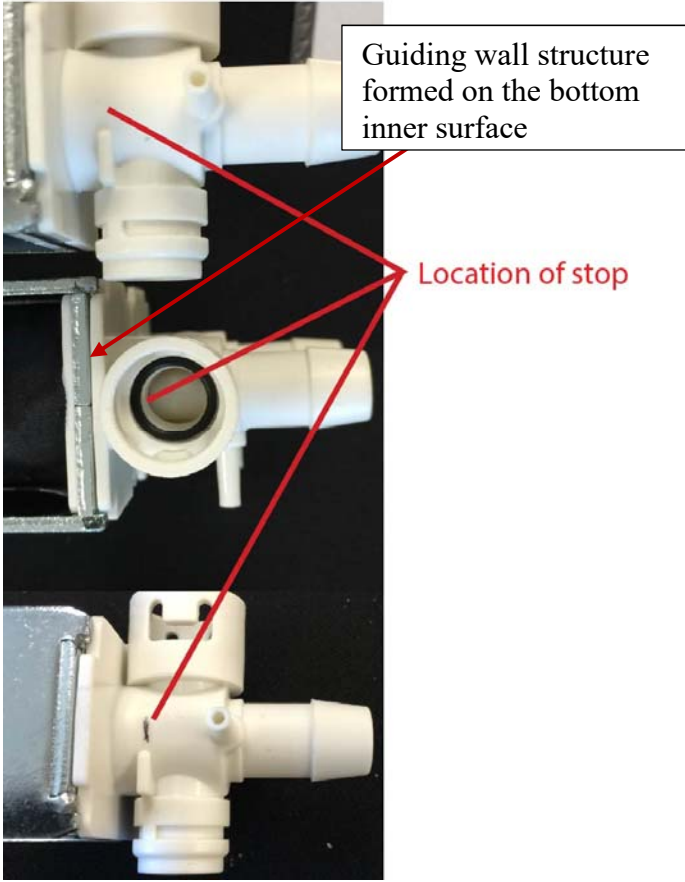
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The enclosure of the Gen 3 Koge includes guiding walls to laterally position solenoid components. The solenoid component extends into the enclosure until it is stopped by a stop configured to limit travel of the solenoid.</p>  |

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

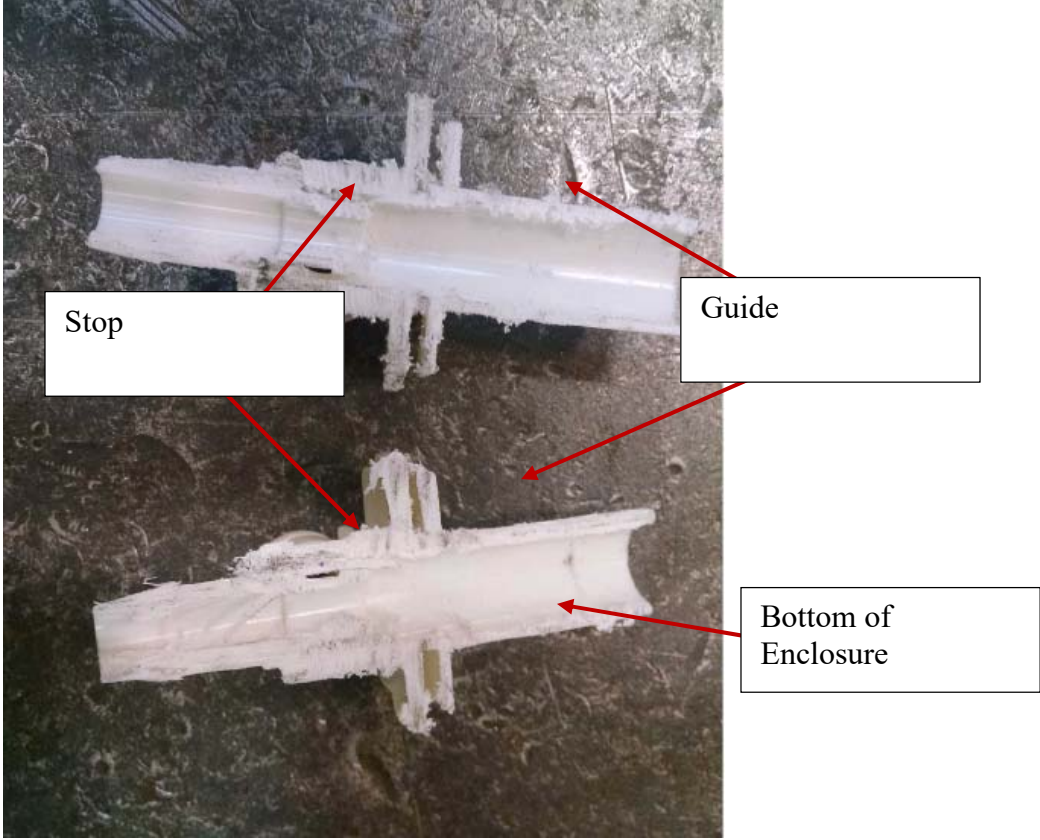
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The guiding wall guide and stop can be further seen on an inner surface of the enclosure in the photograph below, a cross section of the enclosure of the enclosure assembly.</p>  |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|--|--|
| <p>[2.2] pressure monitor means being operably coupled to the processor and being in fluid communication with the at least one bladder for continuously monitoring the pressure in the at least one bladder.</p> | <p>The “pressure monitor means” is a means-plus-function limitation subject to pre-AIA 35 U.S.C. § 112, ¶ 6. The function is continuously monitoring the pressure in the at least one bladder. The structure is a port fluidly coupled to the interior of the valve enclosure assembly that is designed to receive a tube, a pressure sensor, and a tube connected to the port and to the pressure sensor, and equivalents thereof. Under this construction, and where the other claim terms are given their plain and ordinary meaning in light of the specification, the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers include a pressure monitor means being operably coupled to the processor and being in fluid communication with the at least one bladder for continuously monitoring the pressure in the at least one bladder.</p> <p>The valve enclosure assembly of the Accused Products having a Gen 3 Arco air controller include a pressure monitor means operably coupled to the processor. Specifically, the valve enclosure assembly of the Gen 3 Arco includes a pressure monitoring port, which is capable of being in fluid communication with the interior of the valve enclosure assembly.</p> <p>Gen 3 Arco:</p> |

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

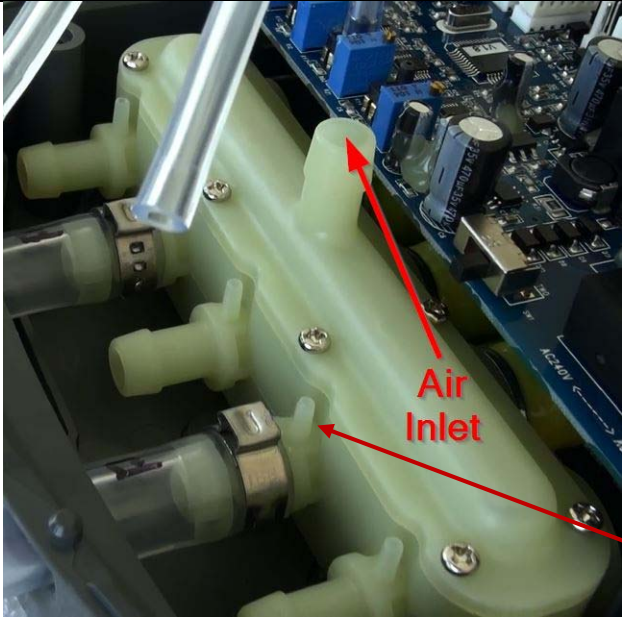
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1339 753 1703 951">Port in fluid communication with the interior of the enclosure of the valve enclosure assembly</p> <p data-bbox="680 961 1041 993">(Photograph of Gen 3 Arco)</p> <p data-bbox="680 1010 1990 1149">As seen, a tube is connected to the pressure monitoring port. The tube is also connected to a pressure sensor. In addition, and as discussed above, the pressure in the one or more air bladders is conveyed to the valve enclosure assembly via tubing that fluidly couples the enclosure to the air bladder(s). The bladder pressure is conveyed to the pressure sensor from the pressure monitoring port.</p> |

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

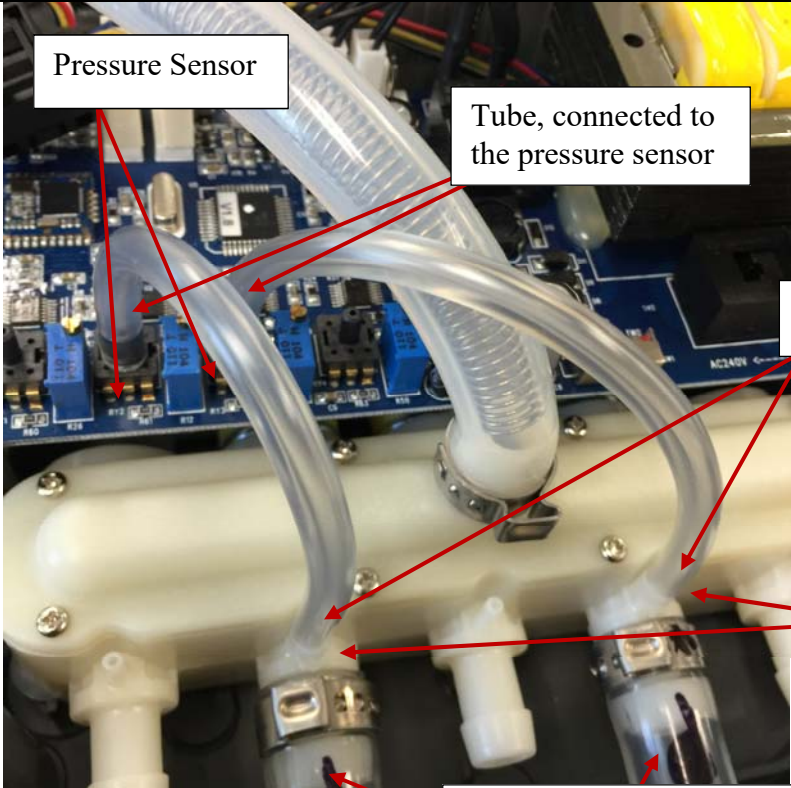
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="716 375 961 440">Pressure Sensor</p> <p data-bbox="1129 423 1423 521">Tube, connected to the pressure sensor</p> <p data-bbox="1455 618 1871 691">Tube, connected to the port</p> <p data-bbox="1549 878 1913 1084">Port in fluid communication with the interior of the enclosure of the valve enclosure assembly</p> <p data-bbox="680 1127 1094 1166">(Photograph of the Gen 3 Arco)</p> <p data-bbox="1121 1122 1675 1219">Tubing Fluidly Coupling the Valve Enclosure Assembly to an Air Bladder</p> <p data-bbox="680 1268 1976 1333">The pressure sensor is operatively coupled to a processor. The processor is configured to monitor and capable of continuously monitoring the pressure detected by the pressure sensor.</p> |

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

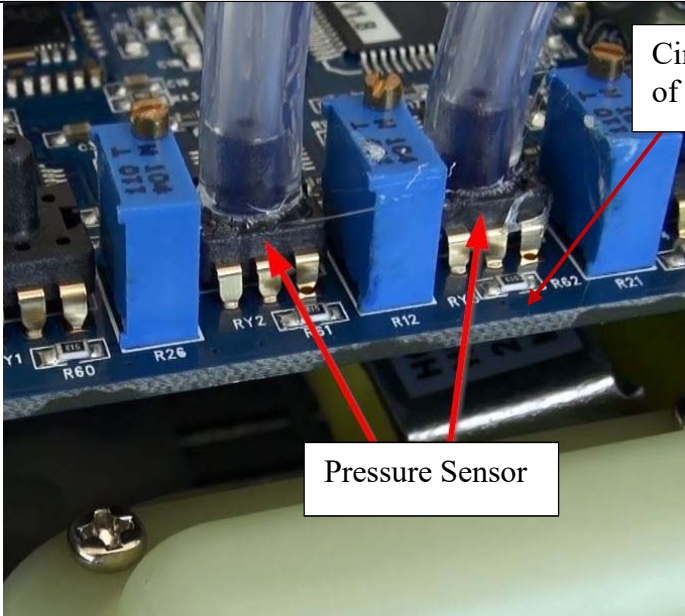
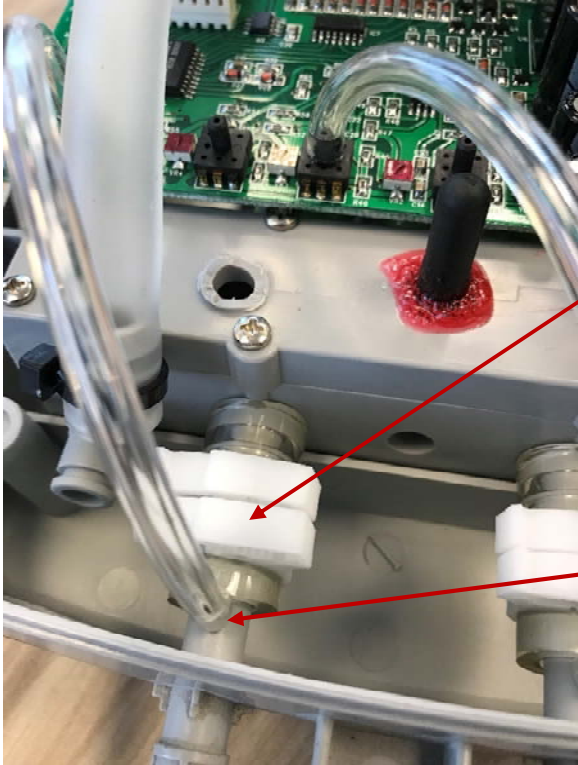
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1304 358 1528 467">Circuit Board of Processor</p> <p data-bbox="982 776 1234 846">Pressure Sensor</p> <p data-bbox="680 963 1041 995">(Photograph of Gen 3 Arco)</p> <p data-bbox="680 1052 1986 1268">The pressure monitor means is in fluid communication with the at least one air bladder and capable of continuously monitoring the pressure in the at least one bladder. Tubing connects the pressure sensor(s) to the pressure monitoring port(s) of the enclosure, the pressure sensor is capable of being in fluid communication with the enclosure of the valve enclosure assembly. Tubing fluidly couples the enclosure to the air bladder(s). The pressure sensor and the processor are therefore capable of continuously monitoring the pressure in the air bladder(s).</p> <p data-bbox="680 1325 1986 1427">The valve enclosure assembly of the Accused Products having a Gen X air controller include a pressure monitor means operably coupled to the processor. Specifically, the valve enclosure assembly of the Gen X includes a pressure monitoring port, which is capable of being in fluid communication</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>with the interior of the valve enclosure assembly.</p> <p>Gen X:</p>  <p>(Photograph of Gen X)</p> <p>As seen, a tube is connected to the pressure monitoring port and to a pressure sensor. In addition, and as discussed above, the pressure in the one or more air bladders is conveyed to the valve enclosure</p> |

Port to interior of the enclosure of the valve enclosure assembly

Pressure monitoring port

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

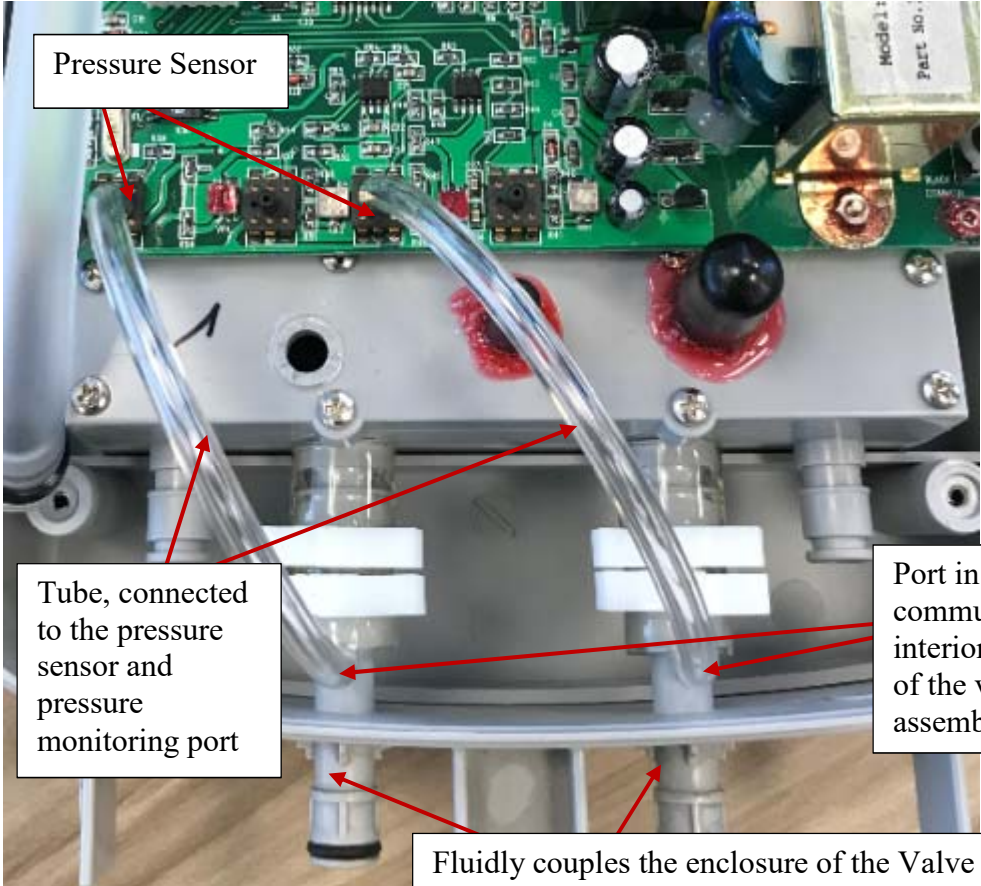
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>assembly via tubing that fluidly couples the enclosure to the air bladder(s). The bladder pressure is conveyed to the pressure sensor from the pressure monitoring port.</p>  <p>Pressure Sensor</p> <p>Tube, connected to the pressure sensor and pressure monitoring port</p> <p>Port in fluid communication with the interior of the enclosure of the valve enclosure assembly</p> <p>Fluidly couples the enclosure of the Valve Enclosure Assembly to an Air Bladder</p> <p>(Photograph of the Gen X)</p> |

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

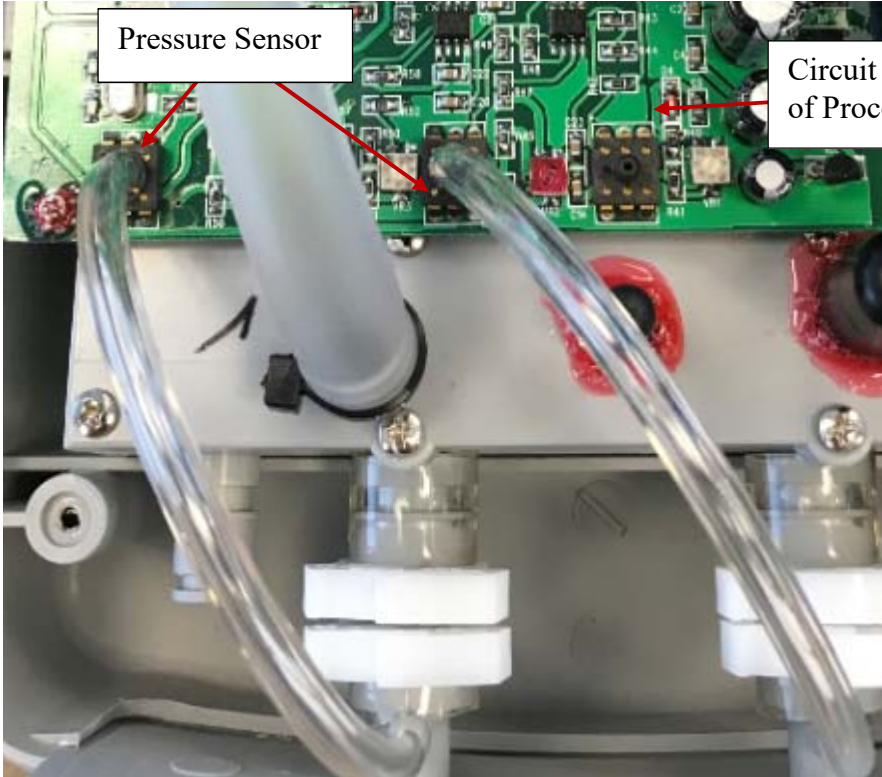
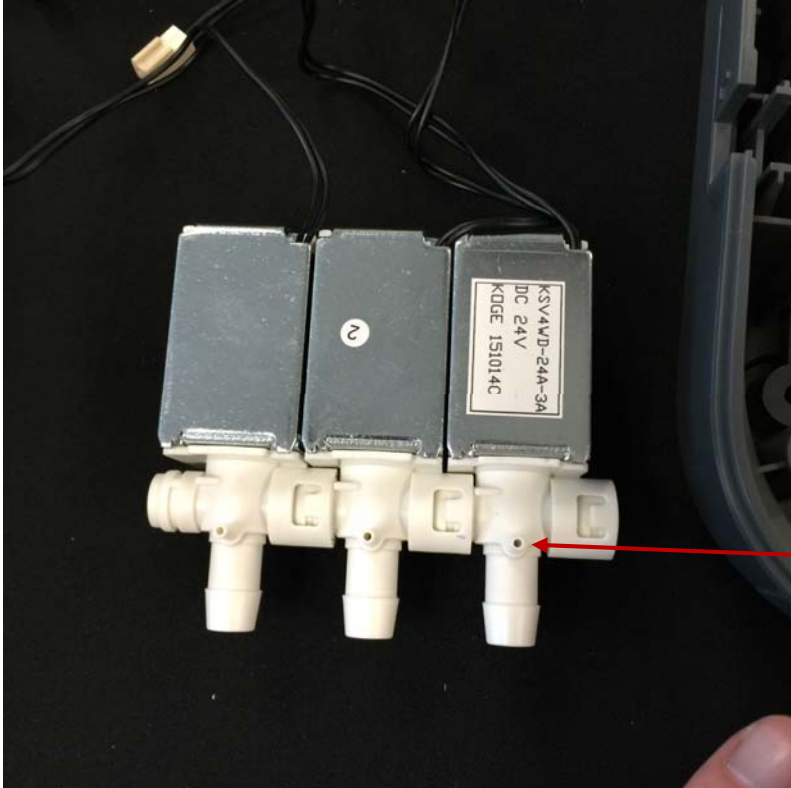
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The pressure sensor is operatively coupled to a processor. The processor is configured to monitor and capable of continuously monitoring the pressure detected by the pressure sensor.</p>  <p>(Photograph of Gen X)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The pressure monitor means is in fluid communication with the at least one air bladder and capable of continuously monitoring the pressure in the at least one bladder. Tubing connects the pressure sensor(s) to the pressure monitoring port(s) of the enclosure, the pressure sensor is capable of being in fluid communication with the enclosure of the valve enclosure assembly. Tubing fluidly couples the enclosure to the air bladder(s). The pressure sensor and the processor are therefore capable of continuously monitoring the pressure in the air bladder(s).</p> <p>The Accused Products having a Gen 3 Koge air controller include pressure monitor means operably coupled to the processor. Specifically, the enclosure of the valve enclosure assembly of the Gen 3 Koge includes a pressure monitoring port in fluid communication with the interior of the enclosure and the air bladder.</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen 3 Koge:</p>  <p>(Photograph of Gen 3 Koge)</p> <p>As seen, a tube is connected to the pressure monitoring port. The tube is also connected to a pressure sensor. In addition, and as discussed above, the pressure in the one or more air bladders is conveyed to the valve enclosure assembly via tubing that fluidly couples the enclosure to the air bladder(s). The air bladder pressure is conveyed to the pressure sensor from the pressure monitoring port.</p> |

Port in fluid communication with the interior of the enclosure of the valve enclosure assembly

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

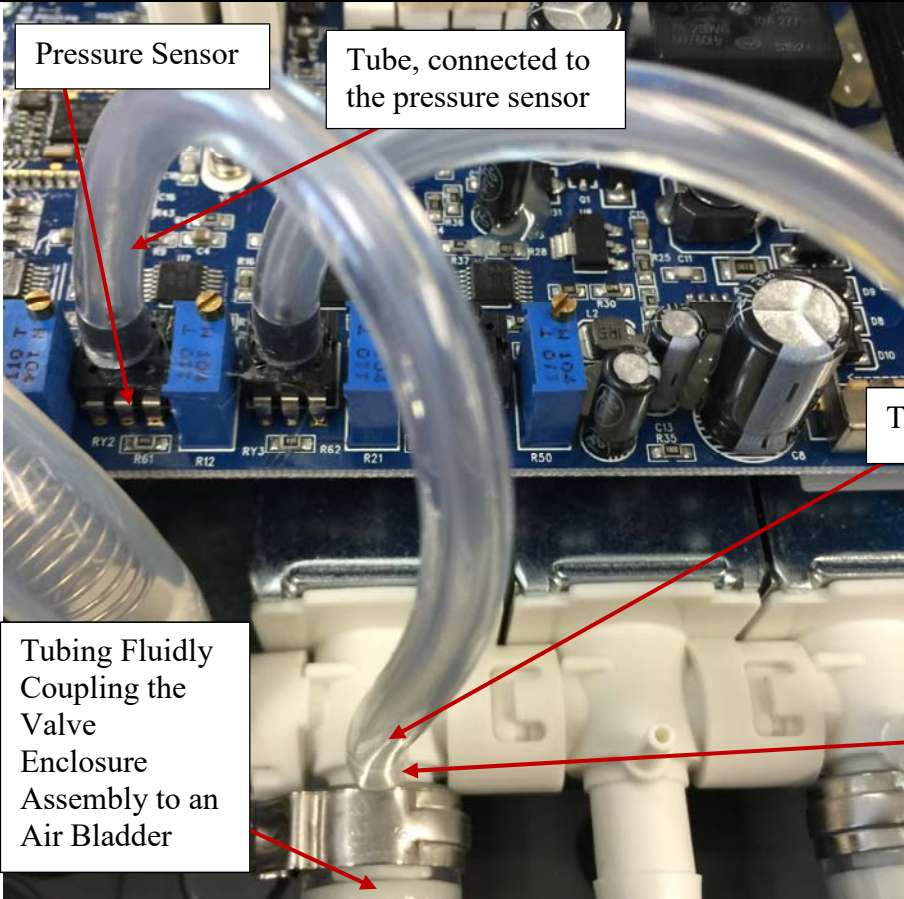
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="695 363 947 423">Pressure Sensor</p> <p data-bbox="1003 363 1297 461">Tube, connected to the pressure sensor</p> <p data-bbox="1541 721 1961 792">Tube, connected to the port</p> <p data-bbox="680 964 926 1198">Tubing Fluidly Coupling the Valve Enclosure Assembly to an Air Bladder</p> <p data-bbox="1583 980 1955 1182">Port in fluid communication with the interior of the enclosure of the valve enclosure assembly</p> <p data-bbox="680 1240 1094 1279">(Photograph of the Gen 3 Koge)</p> <p data-bbox="680 1333 1976 1403">The pressure sensor is operatively coupled to a processor. The processor is configured to monitor and capable of continuously monitoring the pressure detected by the pressure sensor.</p> |

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

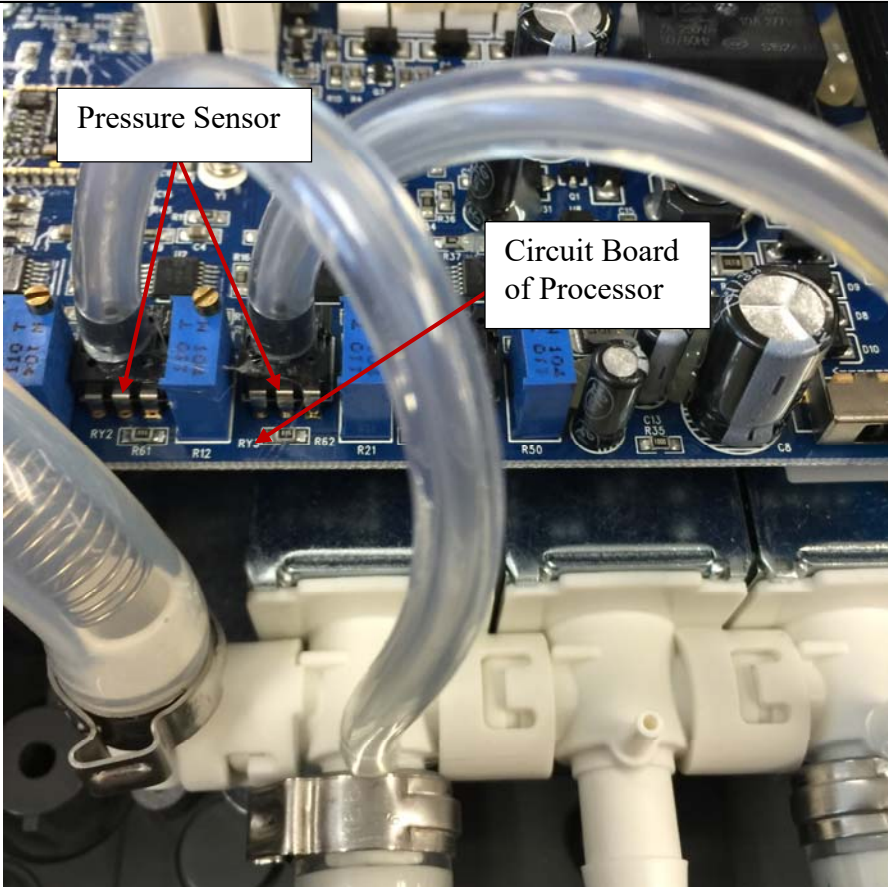
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>(Photograph of Gen 3 Koge)</p> <p>The pressure monitor means is in fluid communication with the at least one air bladder and capable of continuously monitoring the pressure in the at least one bladder. Tubing connects the pressure sensor(s) to the pressure monitoring port(s) of the enclosure, the pressure sensor is capable of being in</p> |

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

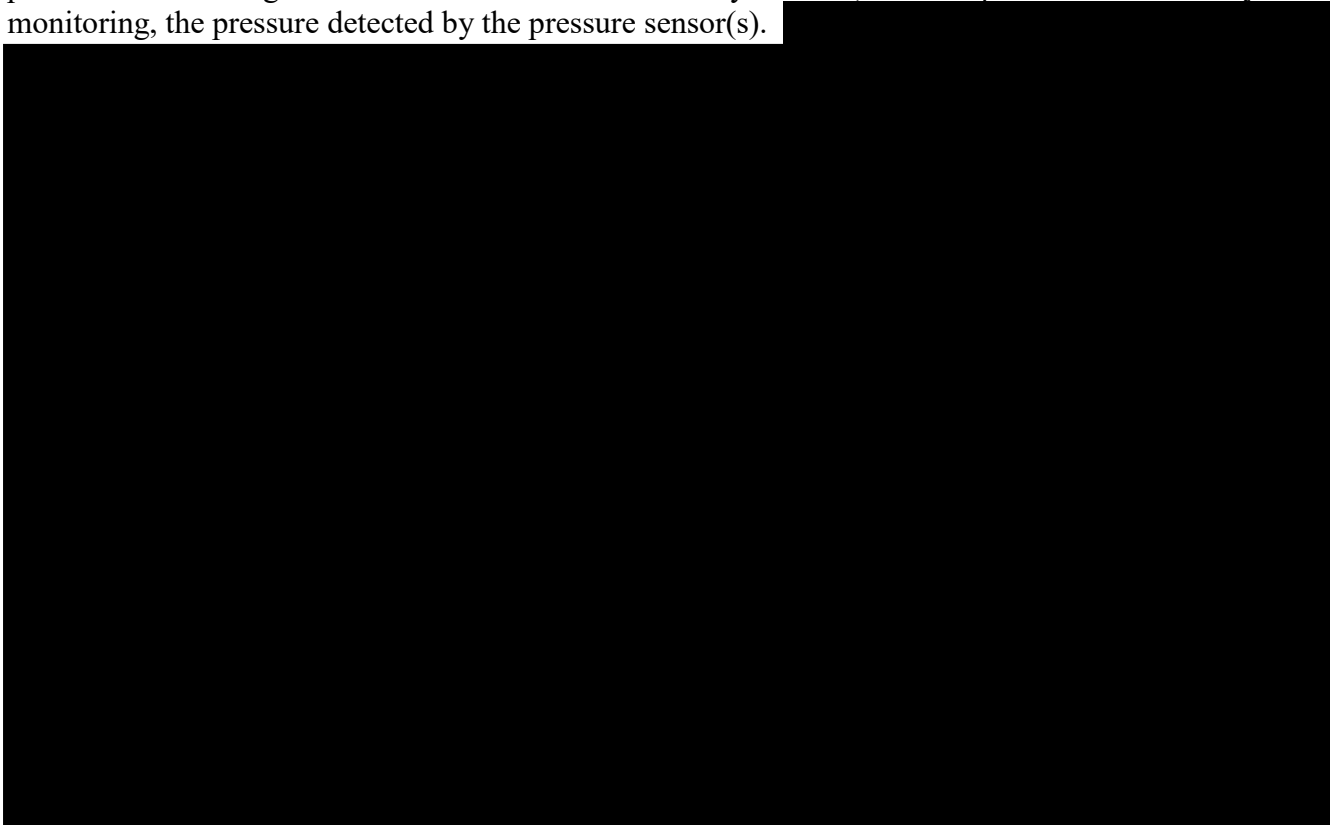
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>fluid communication with the enclosure of the valve enclosure assembly. Tubing fluidly couples the enclosure to the air bladder(s). The pressure sensor and the processor are therefore capable of continuously monitoring the pressure in the air bladder(s).</p> <p>Versions 1.8, 1.97, and 2.0 of ANM's source code further demonstrate that Gen 3 Accused Products' processors are configured to monitor and do continuously monitor, or are capable of continuously monitoring, the pressure detected by the pressure sensor(s).</p>  |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|----------------------|---|
| |  A large black rectangular redaction covers the entire content area of the table, obscuring all text and data. |

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

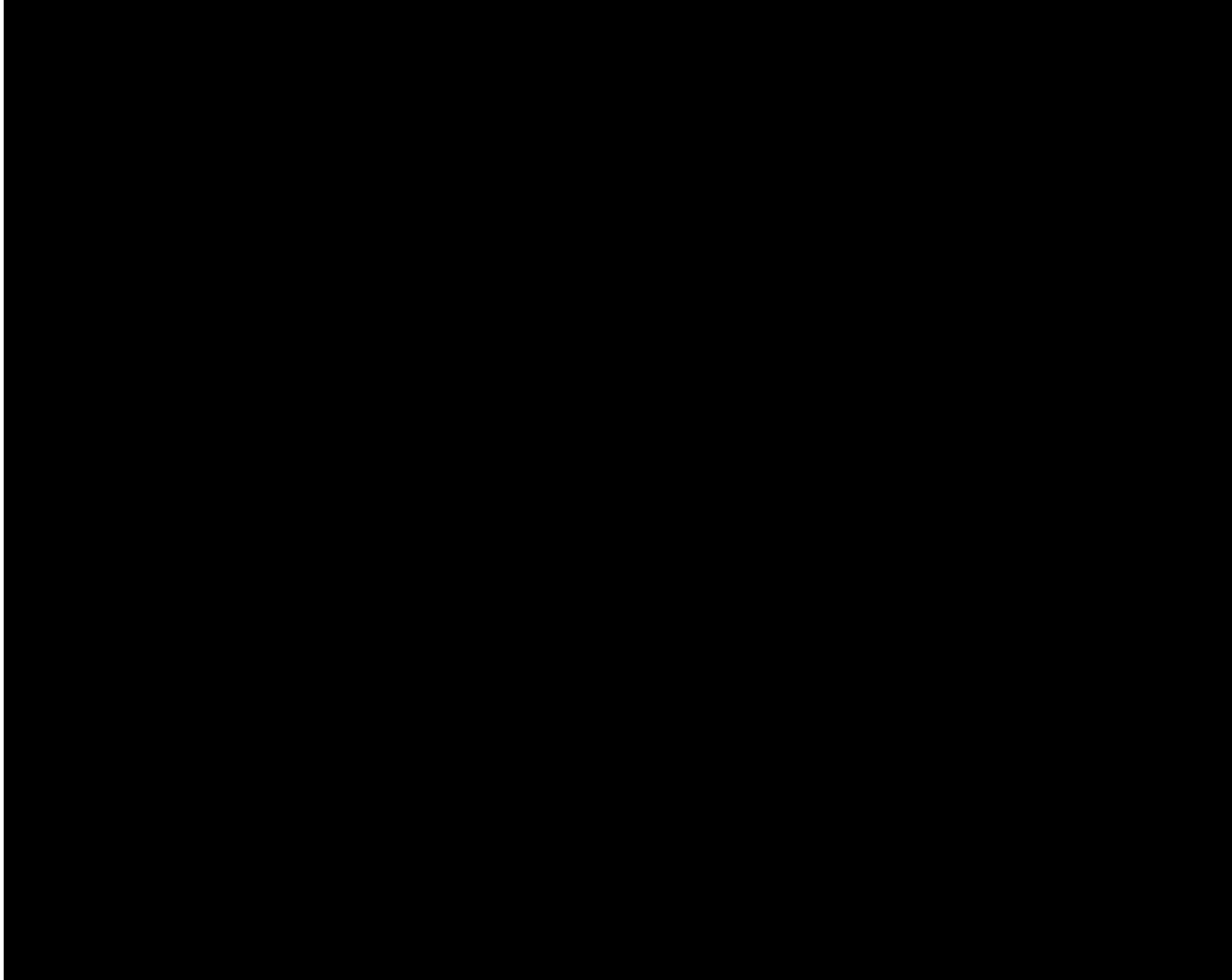
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|----------------------|---|
| |  A large black rectangular redaction covers the entire content area of the table, obscuring all text and data. |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|----------------------|--|
| |  The content of this table is redacted with a solid black fill. |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <div data-bbox="674 342 1999 1182" style="background-color: black; width: 100%; height: 517px; margin-bottom: 10px;"></div> <p data-bbox="674 1222 1976 1401">This limitation may further implicate other electronics, software, firmware, and/or source code of the Accused Products. Additional Source Code for the Accused Products may further show how this claim limitation is met. To resolve a dispute regarding Plaintiff’s Notice of Inspection for Source Code, the parties have agreed that Plaintiff shall be allowed to inspect remaining Source Code for the Accused Products on mutually agreeable date(s), after which Plaintiff shall supplement its</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---|--|
| | infringement contentions, pursuant to an agreed-upon timeline and without opposition, using the information learned during the inspection. |
| Claim 6 | |
| <p>[6.P] 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, comprising:</p> | <p>The preamble of claim 6 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> |

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

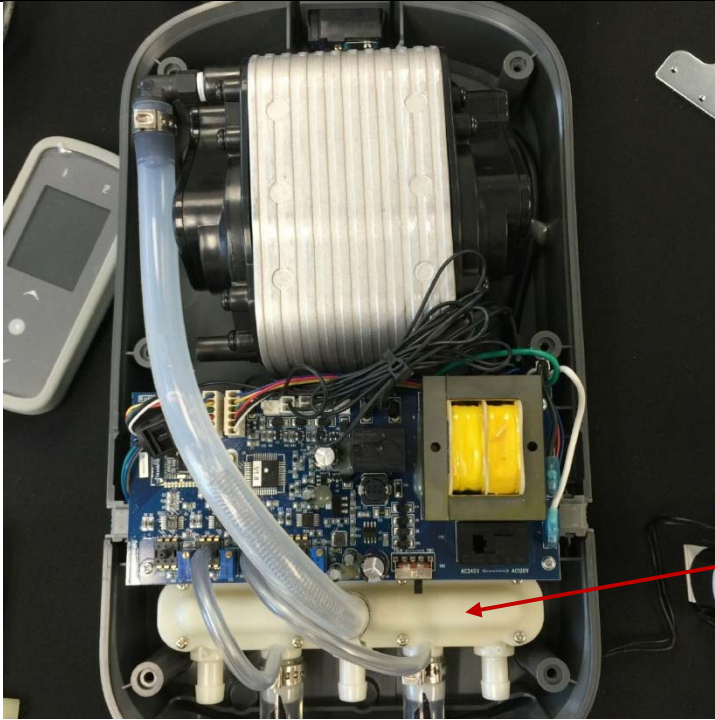
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="680 1062 1041 1094">(Photograph of Gen 3 Arco)</p> <p data-bbox="1493 824 1740 976">Enclosure of Valve Enclosure Assembly</p> <p data-bbox="680 1240 1955 1312">The Accused Products having a Gen X air controller include an improved valve enclosure assembly for use with an air inflatable mattress having at least one air bladder inflated by compressed air:</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="680 992 978 1024">(Photograph of Gen X)</p> <p data-bbox="680 1305 1976 1406">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:</p> |

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

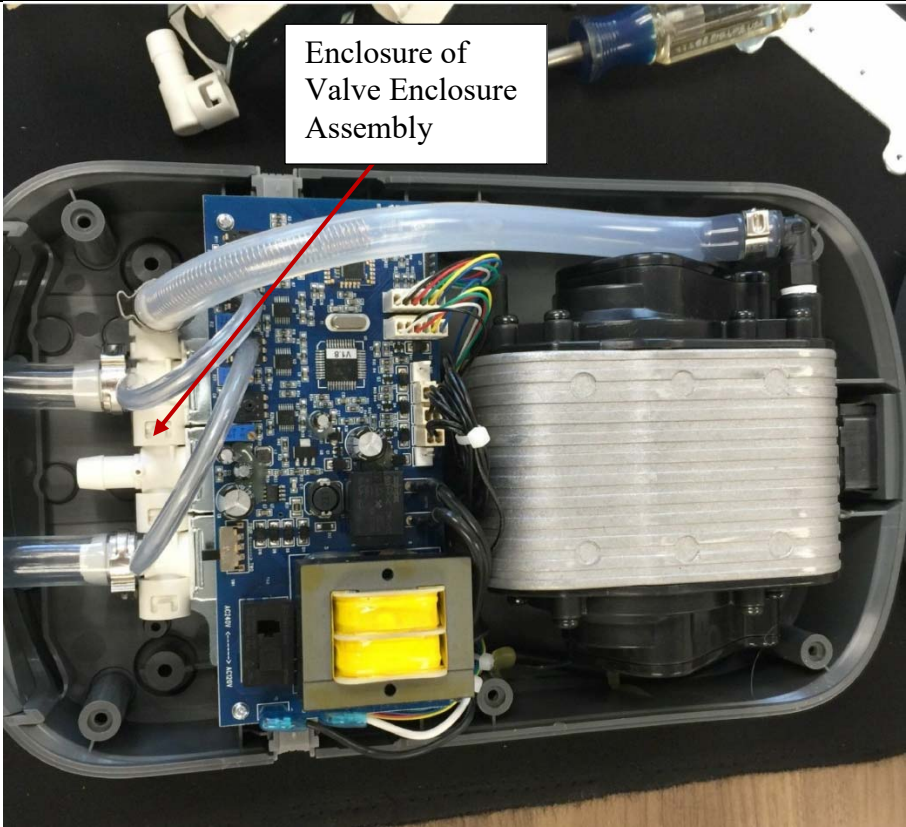
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="680 1166 1050 1205">(Photograph of Gen 3 Koge)</p> <p data-bbox="680 1302 1963 1409">The valve enclosure assemblies of the Gen 3 Arco, Gen X, and Gen 3 Koge are used with an air inflatable mattress having at least one air bladder inflated by compressed air. Non-limiting examples of said use is shown in the photographs below.</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="1453 425 1722 519">Air Inflatable Mattress</p> <p data-bbox="680 912 999 1058">Air Controller containing the Valve Enclosure Assembly</p> <p>The photograph shows a white, quilted air inflatable mattress lying flat on a grey floor. A black air controller unit is connected to the mattress via a grey hose. A red arrow points from the text box 'Air Inflatable Mattress' to the mattress. Another red arrow points from the text box 'Air Controller containing the Valve Enclosure Assembly' to the black controller unit.</p> |

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

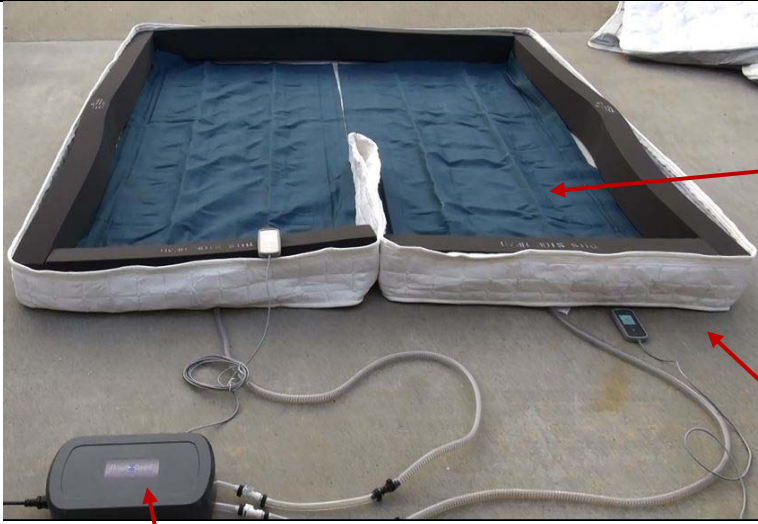
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1497 386 1810 571">Air Bladder of Air Inflatable Mattress, which is inflatable by compressed air</p> <p data-bbox="1497 724 1766 818">Air Inflatable Mattress</p> <p data-bbox="747 886 1062 1029">Air Controller containing the Valve Enclosure Assembly</p> |

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

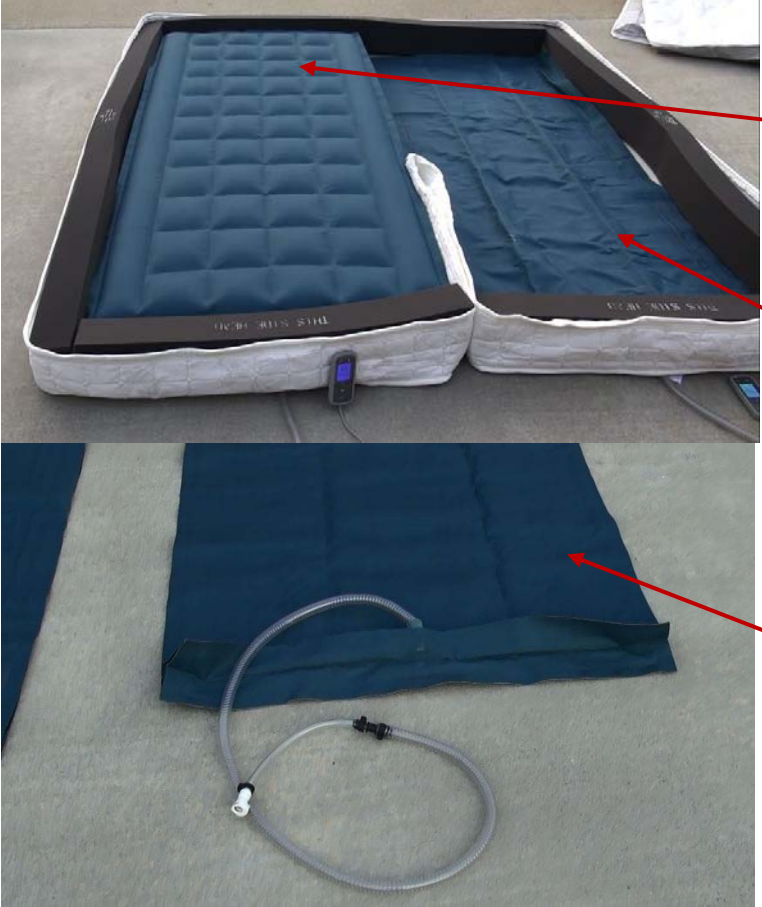
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="1470 357 1774 544">Air Bladder of Air Inflatable Mattress, inflated by compressed air</p> <p data-bbox="1470 568 1774 755">Air Bladder of Air Inflatable Mattress, deflated</p> <p data-bbox="1470 860 1785 1047">Air Bladder of Air Inflatable Mattress, which is inflatable by compressed air</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <div data-bbox="699 354 970 451" style="border: 1px solid black; padding: 5px; width: fit-content;">Air Inflatable Mattress</div> <div data-bbox="1627 378 1942 565" style="border: 1px solid black; padding: 5px; width: fit-content;">Bladders of Air Inflatable Mattress, which are inflatable by compressed air</div> <div data-bbox="1568 755 1883 901" style="border: 1px solid black; padding: 5px; width: fit-content;">Air Controller containing the Valve Enclosure Assembly</div>  <p data-bbox="678 1008 1245 1040">(Photograph of medical air mattress system)</p> <p data-bbox="678 1101 1969 1421">In the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers, the pump is fluidly coupled to the at least one air bladder for providing compressed air thereto. In the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers, the improved valve enclosure assembly is fluidly coupled intermediate the pump and the at least one air bladder for controlling the inflation of the at least one air bladder. As shown in the photographs below, the pump is fluidly coupled to the enclosure of the valve enclosure assembly via tubing. The enclosure of the valve enclosure assembly is then similarly fluidly coupled to the at least one air bladder with tubing. The pump provides compressed air to the at least one air bladder via the tubing between the pump and the enclosure of the valve enclosure assembly and the tubing between the valve enclosure assembly and the air bladder.</p> |

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

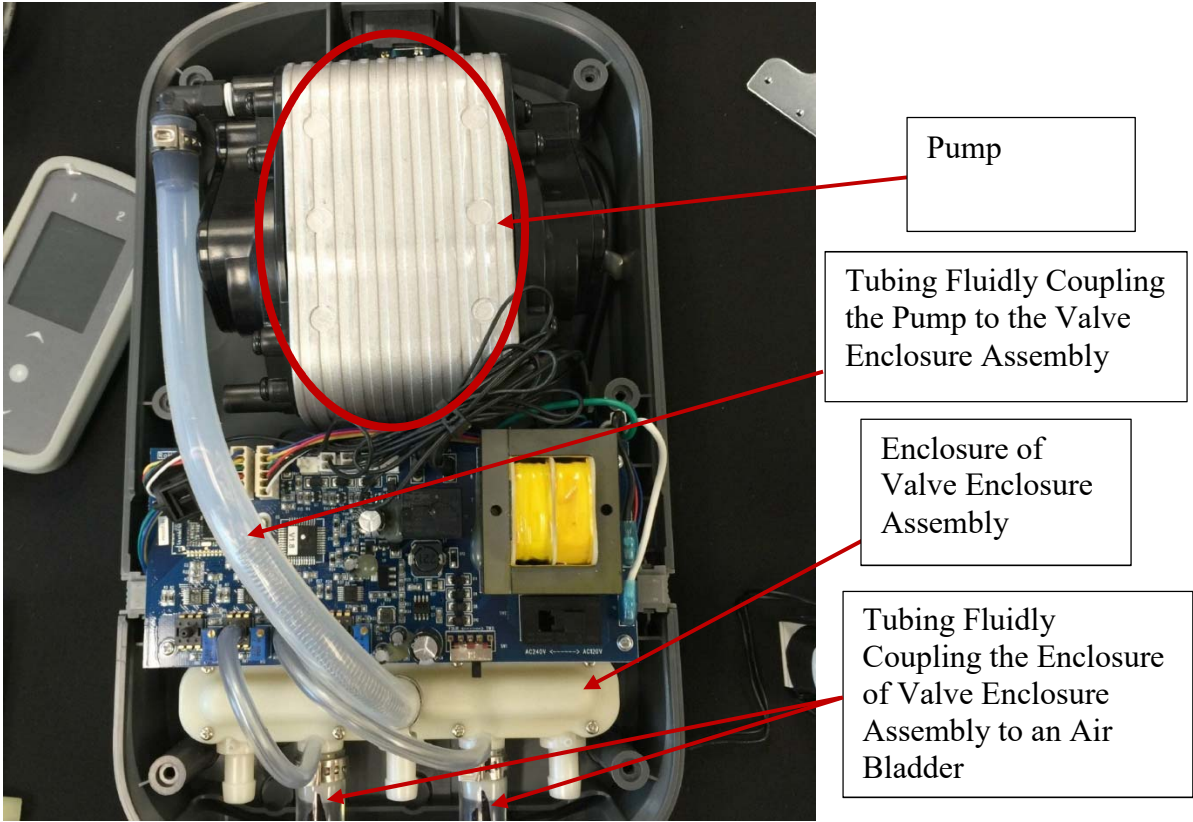
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen 3 Arco:</p>  <p>(Photograph of Gen 3 Arco)</p> |

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

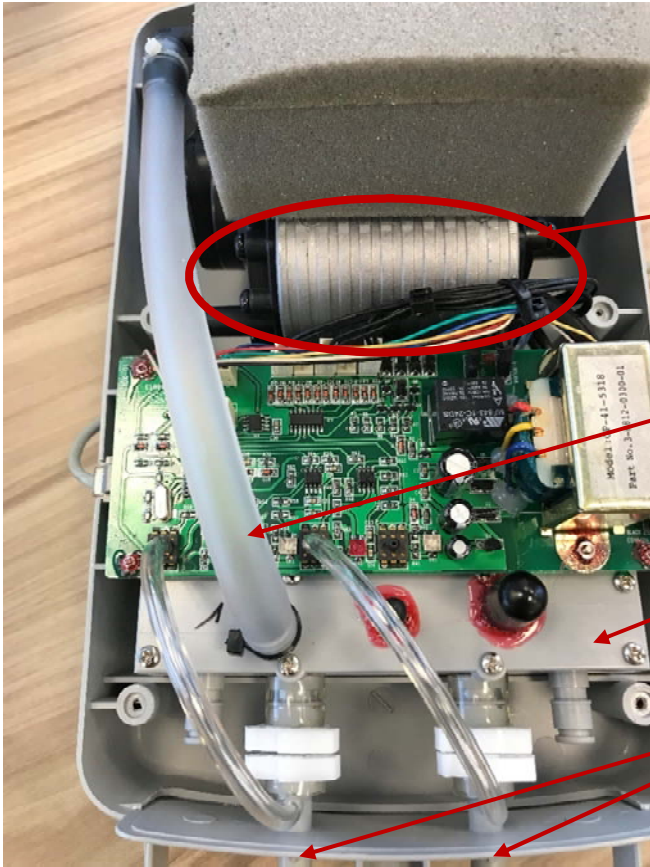
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen X:</p>  <p>(Photograph of Gen X)</p> |

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

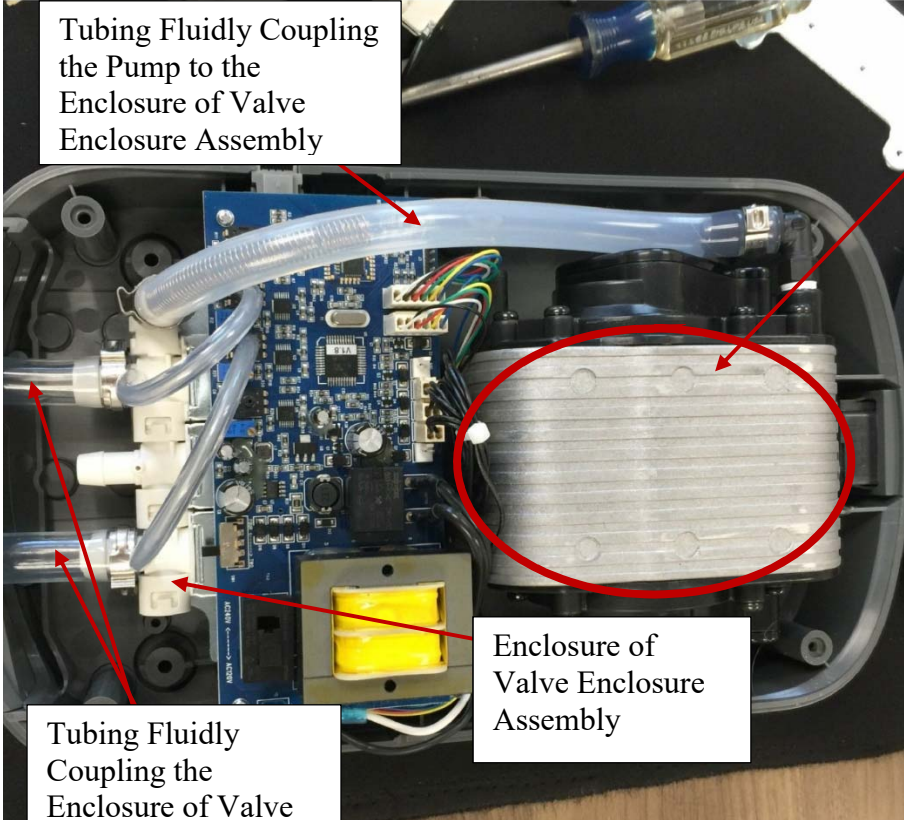
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen 3 Koge:</p>  <p>(Photograph of Gen 3 Koge)</p> |

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

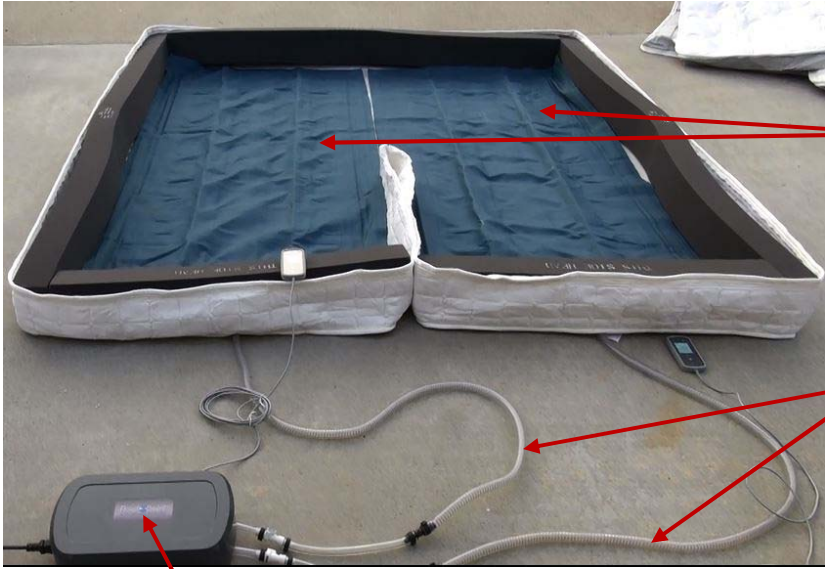
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>As shown in the example of a Gen 3 air controller being used with an inflatable air mattress, the two tubes that fluidly couple to the valve enclosure assembly fluidly couple to the air bladders of the inflatable air mattress. Because the pump is fluidly coupled to the air bladder, the air bladders inflate using the compressed air from the pump.</p>  <p data-bbox="1562 521 1877 708">Air Bladders of Air Inflatable Mattress, which are inflated using compressed air</p> <p data-bbox="1541 753 1848 940">Tubing Fluidly Coupling the Valve Enclosure Assembly to an Air Bladder</p> <p data-bbox="781 1068 1096 1211">Air Controller containing the Valve Enclosure Assembly</p> <p>In the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers, a processor provides commands to the improved valve enclosure assembly during an inflate/deflate cycle:</p> |

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

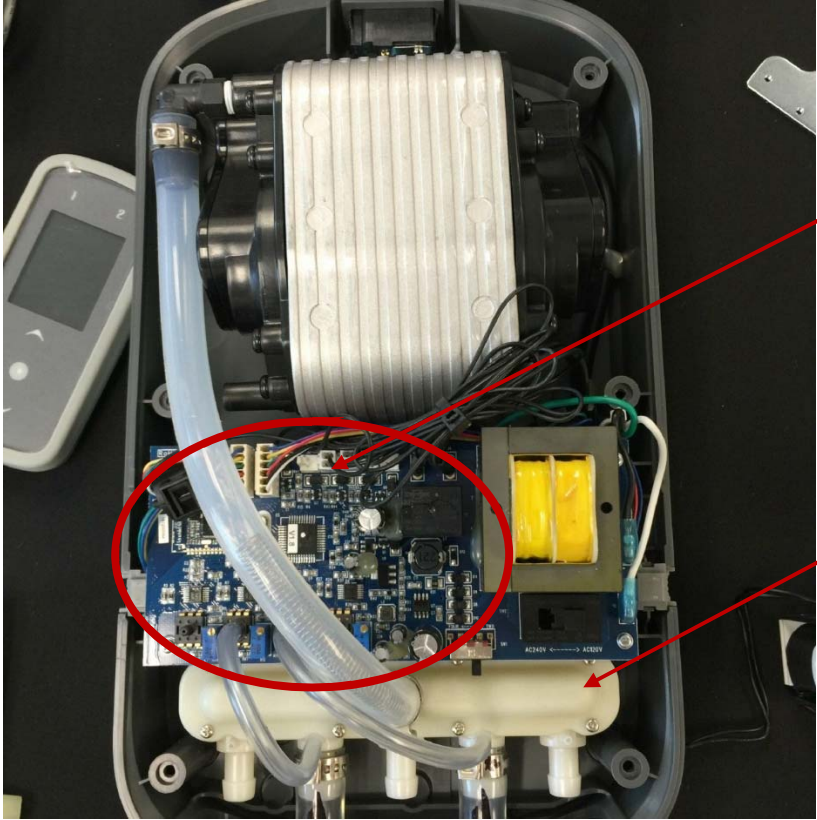
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen 3 Arco:</p>  <p>Printed Circuit Board for Processor, which provides commands to the improved valve enclosure assembly during an inflate/deflate cycle</p> <p>Enclosure of Valve Enclosure Assembly</p> <p>(Photograph of Gen 3 Arco)</p> |

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

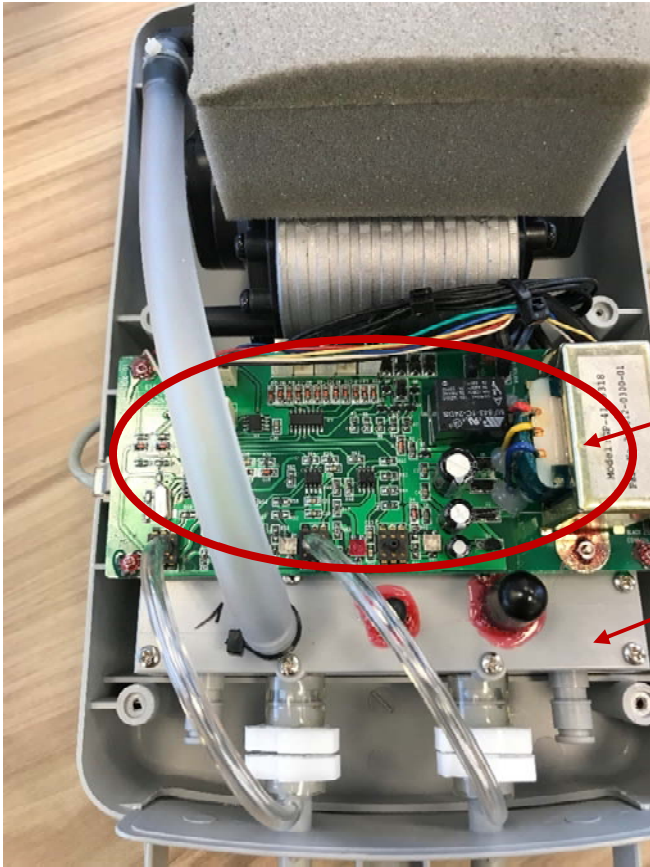
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen X:</p>  <p>Printed Circuit Board for Processor, which provides commands to the improved valve enclosure assembly during an inflate/deflate cycle</p> <p>Enclosure of Valve Enclosure Assembly</p> <p>(Photograph of Gen X)</p> |

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

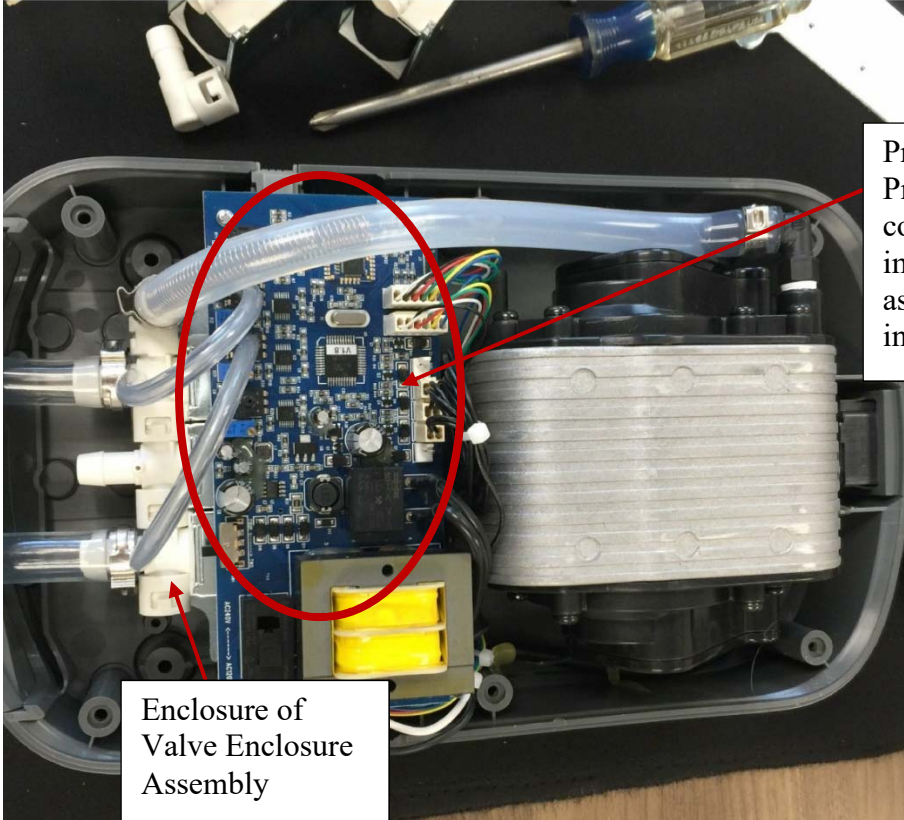
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>Gen 3 Koge:</p>  <p>Printed Circuit Board for Processor, which provides commands to the improved valve enclosure assembly during an inflate/deflate cycle</p> <p>Enclosure of Valve Enclosure Assembly</p> <p>(Photograph of Gen 3 Koge)</p> <p>Versions 1.8, 1.97, and 2.0 of ANM's source code further demonstrate that the Gen 3 Accused Products include a processor for providing commands to the improved valve enclosure assembly during an inflate/deflate cycle.</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|----------------------|--|
| |  A large black rectangular redaction covers the entire content area of the table, obscuring all text and data that would otherwise be present in the 'INFRINGEMENT CONTENTIONS' column. |

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

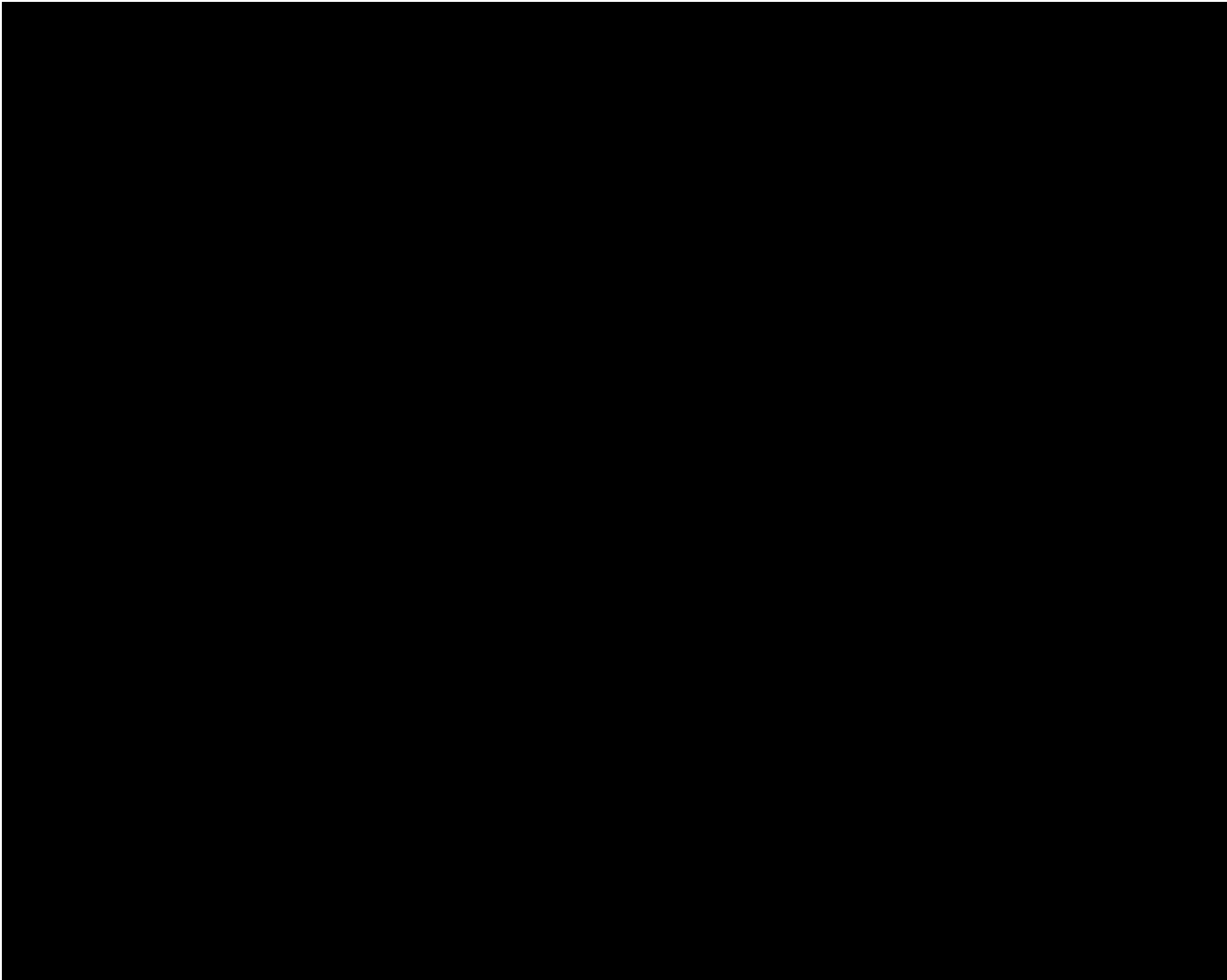
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|----------------------|---|
| |  A large black rectangular redaction covers the entire content area of the table, obscuring all text and data. |

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

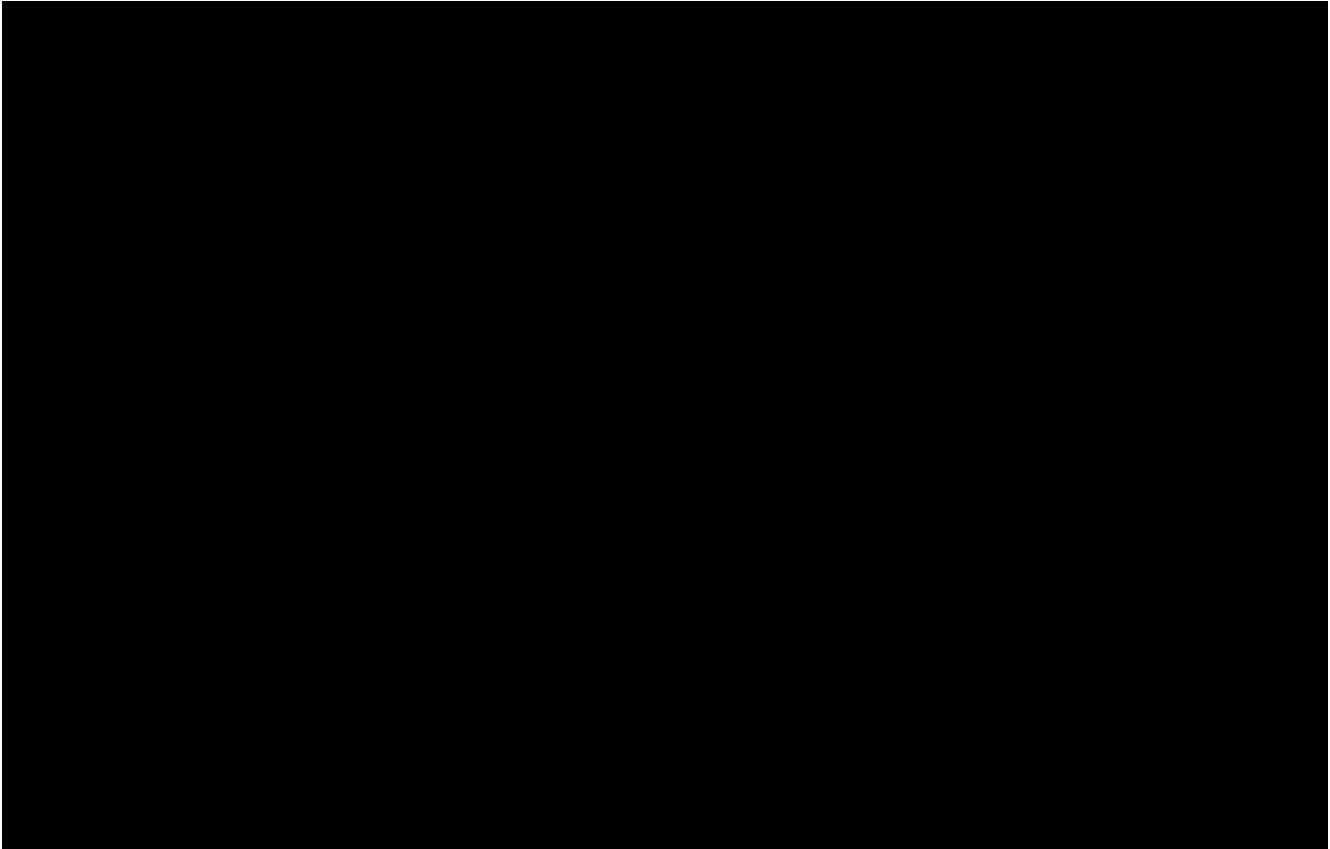
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="676 1240 1976 1416">This limitation may further implicate other electronics, software, firmware, and/or source code of the Accused Products. Additional Source Code for the Accused Products may further show how this claim limitation is met. To resolve a dispute regarding Plaintiff's Notice of Inspection for Source Code, the parties have agreed that Plaintiff shall be allowed to inspect remaining Source Code for the Accused Products on mutually agreeable date(s), after which Plaintiff shall supplement its</p> |

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

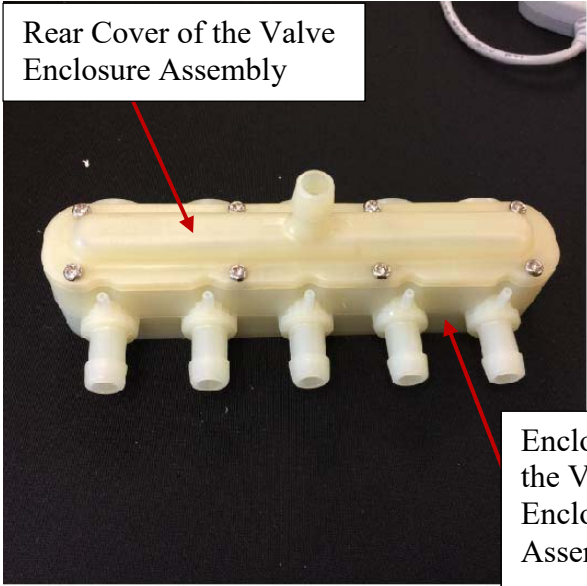
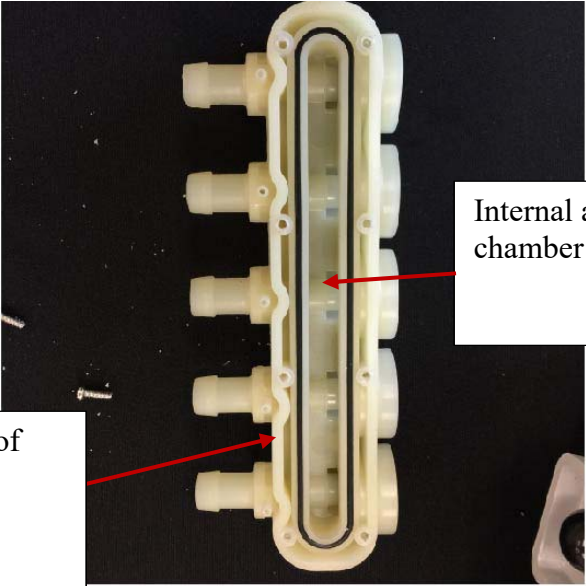
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>infringement contentions, pursuant to an agreed-upon timeline and without opposition, using the information learned during the inspection.</p> <p>Even under Defendants’ construction from the ITC proceeding, where a “valve enclosure assembly” means “an enclosure and a rear cover defining an internal, pressurized air chamber enclosing a valve,” ANM’s Gen 3 or Gen X air controllers meet this claim limitation.</p> <p>As seen in the photographs below, the enclosure of the Gen 3 Arco’s valve enclosure assembly is comprised of an enclosure and a rear cover.</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p>Rear Cover of the Valve Enclosure Assembly</p> <p>Enclosure of the Valve Enclosure Assembly</p> <p>Enclosure</p> </div> <div style="text-align: center;">  <p>Internal air chamber</p> <p>Enclosure with Rear Cover Removed</p> </div> </div> <p>(Photograph of the Gen 3 Arco)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Furthermore, as seen in the photograph below showing a side perspective view of the Gen 3 Arco's enclosure, the Gen 3 Arco the internal chamber is shown enclosing a valve.</p> |

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

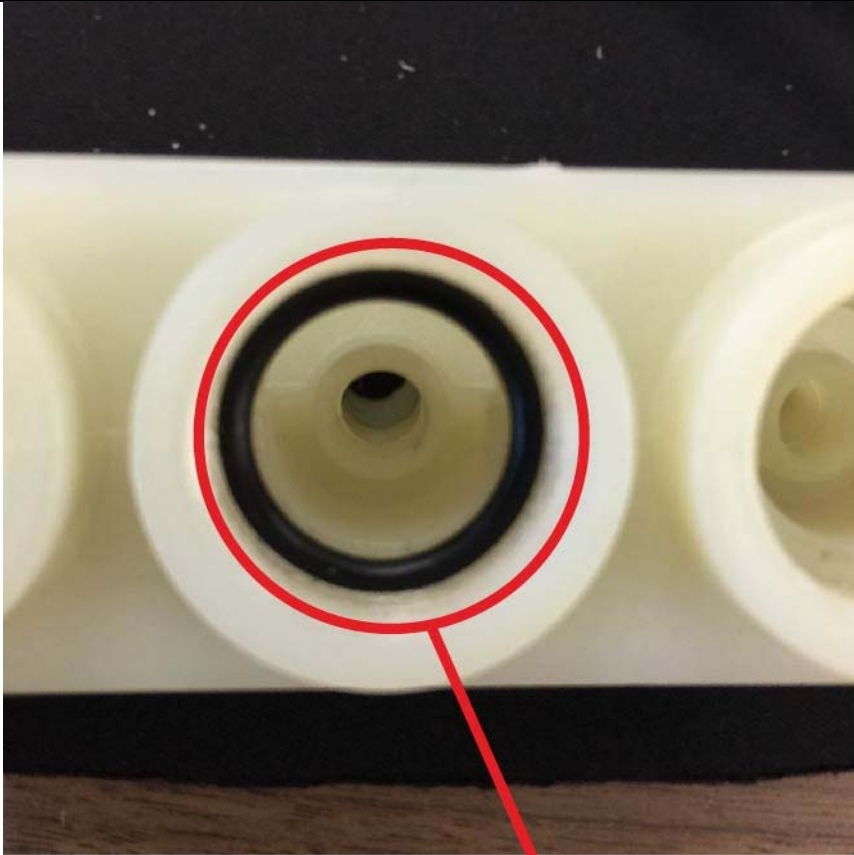
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="829 1289 1656 1360">Perspective view of the internal chamber enclosing a valve</p> <p data-bbox="680 1370 1041 1409">(Photograph of Gen 3 Arco)</p> |

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

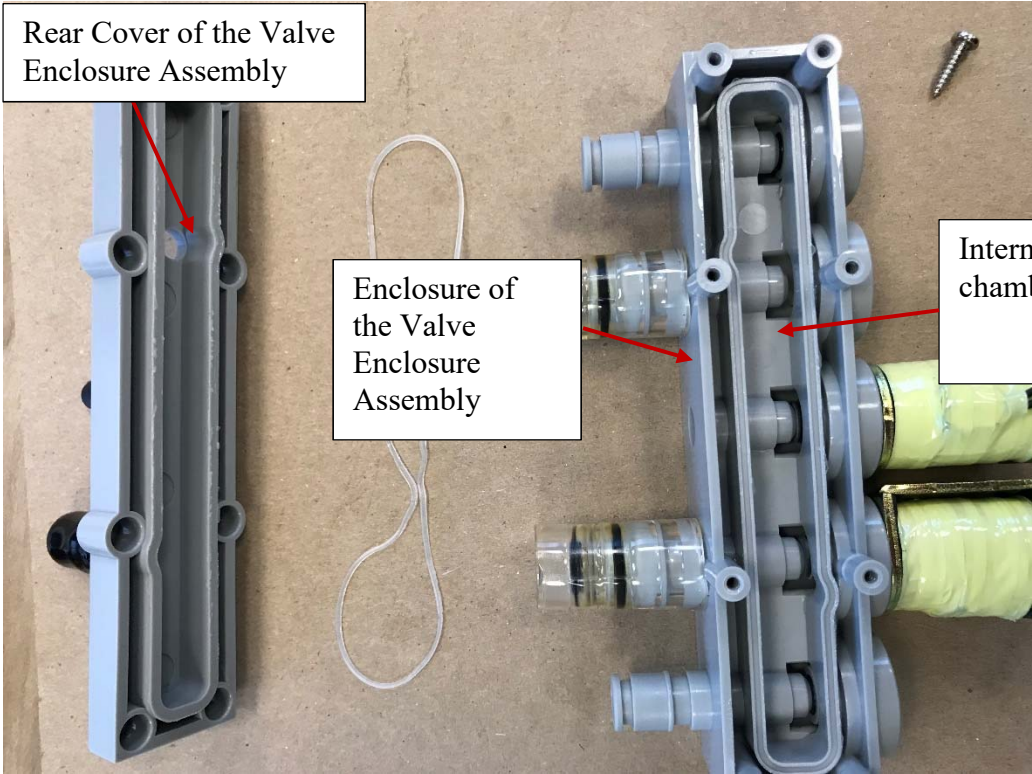
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>As seen in the photographs below, the enclosure of the Gen X's valve enclosure assembly is comprised of an enclosure and a rear cover.</p>  <p>(Photograph of the Gen 3 Arco)</p> <p>Furthermore, as seen in the photograph below showing a side perspective view of the Gen 3 Arco's enclosure, the Gen 3 Arco the internal chamber is shown enclosing a valve.</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1444 743 1692 951">Internal Chamber Enclosing a Valve</p> <p data-bbox="680 1289 1041 1321">(Photograph of Gen 3 Arco)</p> |

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

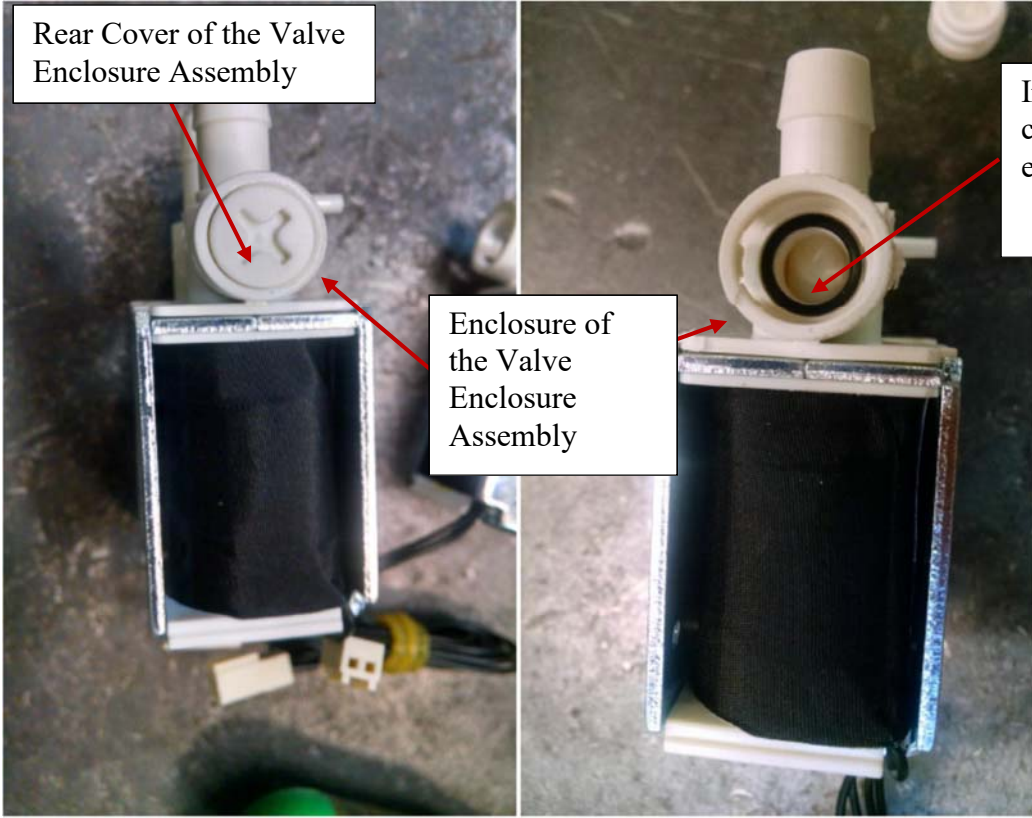
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>As seen in the photographs below, the enclosure of the Gen 3 Koge's valve enclosure assembly is comprised of an enclosure and a rear cover. The valve seal is contained within the enclosure, which shows how the enclosure and rear cover define an internal air chamber enclosing a valve.</p>  <p style="text-align: center;">Enclosure Enclosure with Rear Cover Removed</p> <p>(Photograph of the Gen 3 Koge)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---|---|
| <p>[6.1] an enclosure defining a substantially fluidly sealed air chamber and having at least one air inlet to the air chamber being fluidly coupled to the pump, the enclosure being formed of an enclosure portion and a rear cover portion, a flexible seal being compressively interposed between the enclosure portion and a rear cover portion to effect a substantially fluid tight seal therebetween; and</p> | <p>Under the plain and ordinary meaning of the claim terms in light of the specification, the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers include an enclosure defining a substantially fluidly sealed air chamber and having at least one air inlet to the air chamber being fluidly coupled to the pump, the enclosure being formed of an enclosure portion and a rear cover portion, a flexible seal being compressively interposed between the enclosure portion and a rear cover portion to effect a substantially fluid tight seal therebetween.</p> <p>The Accused Products having a Gen 3 Arco air controller include a valve enclosure assembly comprised, in part, of an enclosure defining a substantially fluidly sealed air chamber that has at least one air inlet to the air chamber and which is fluidly coupled to the pump.</p> |

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

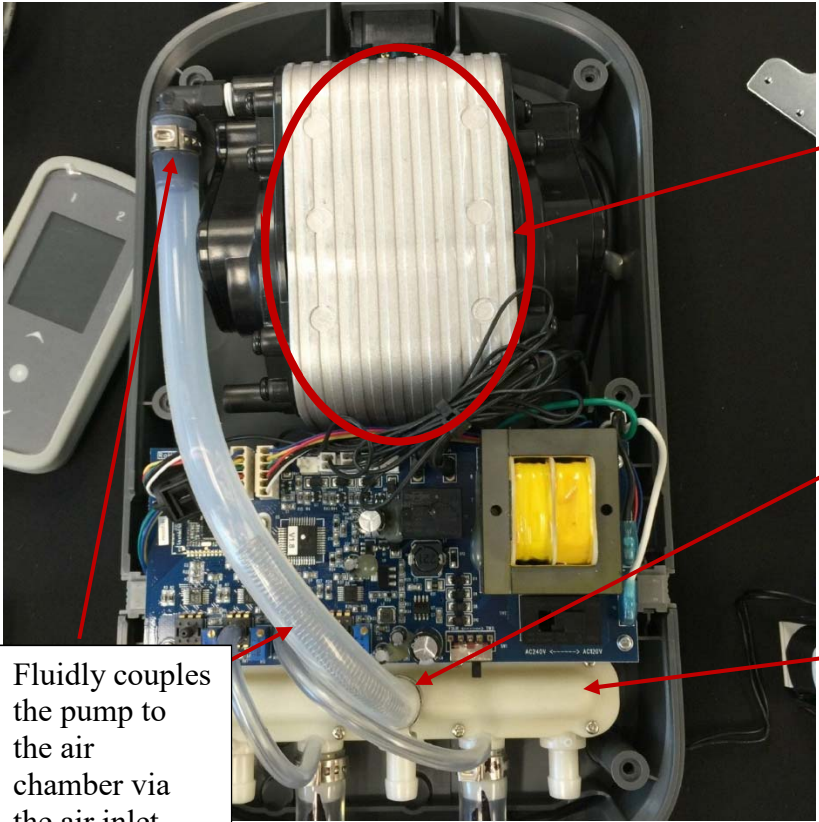
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen 3 Arco:</p>  <p>(Photograph of Gen 3 Arco)</p> <p>As seen in the photograph above, tubing connects the pump to the enclosure and to the air inlet to the air chamber of the enclosure. That is, the air inlet to the air chamber is fluidly coupled to the pump.</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1241 813 1419 862">Air Inlet</p> <p data-bbox="1539 521 1906 711">Enclosure, which defines a Substantially Fluidly Sealed Air Chamber</p> <p data-bbox="680 1089 1041 1122">(Photograph of Gen 3 Arco)</p> |

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

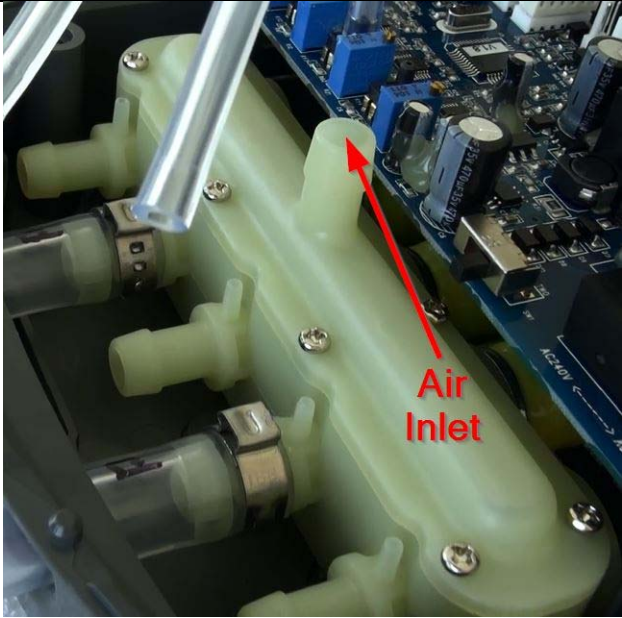
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photograph of Gen 3 Arco)</p> <p>As further seen from the photographs below, the enclosure defines an air chamber. The air chamber includes one or more O-rings, which assist in substantially fluidly sealing the air chamber.</p> |

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

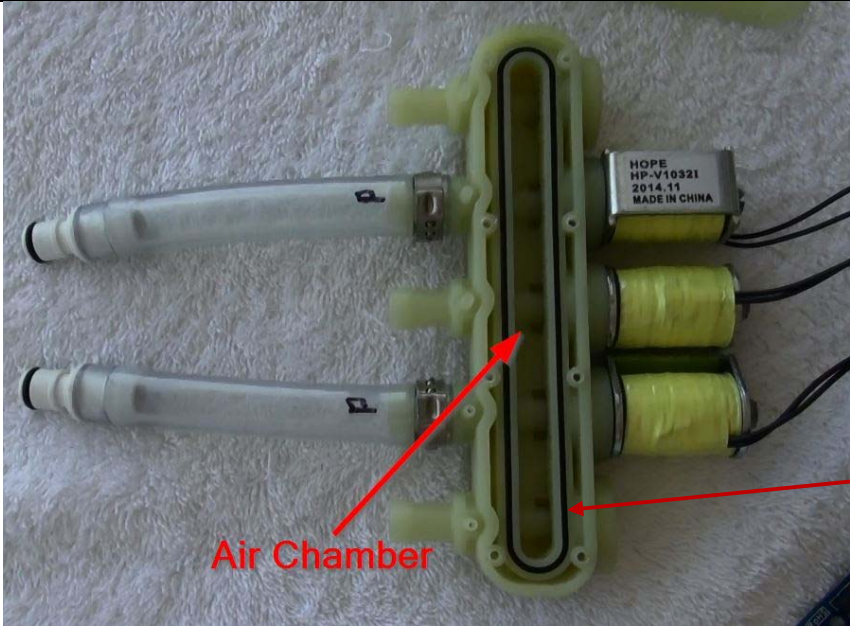
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="680 971 1871 1040">(Photograph of Gen 3 Arco's enclosure (depicted with the rear-cover removed for illustrative purposes).)</p> |

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

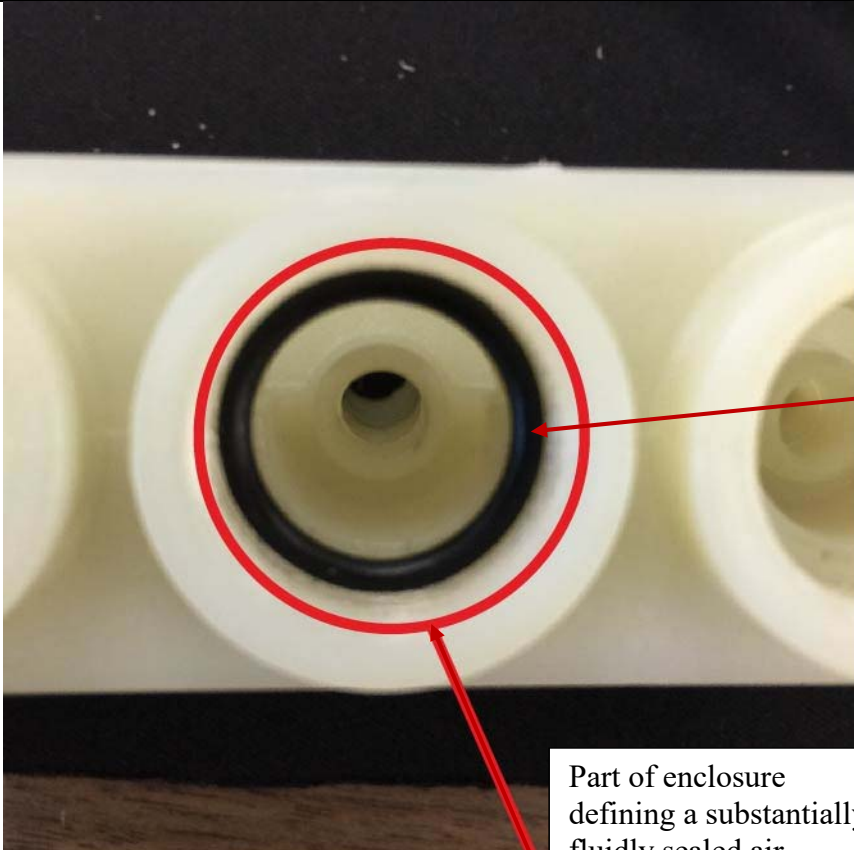
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1549 638 1917 829">O-ring, which assists in substantially fluidly sealing the air chamber</p> <p data-bbox="1224 1081 1591 1239">Part of enclosure defining a substantially fluidly sealed air chamber</p> <p data-bbox="680 1284 1654 1320">(Photograph of Gen 3 Arco's enclosure (depicted with solenoids removed).)</p> |

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

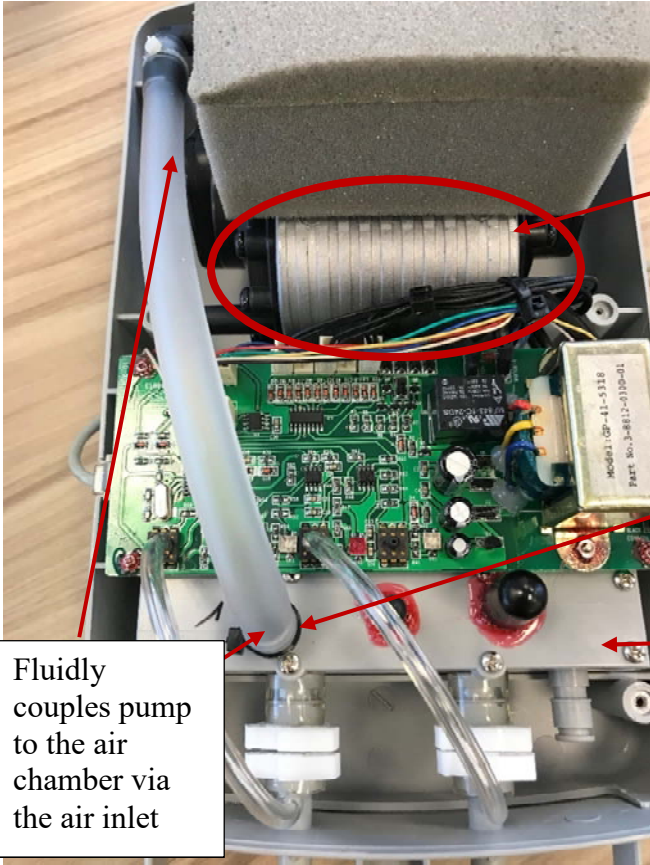
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The Accused Products having a Gen X air controller include a valve enclosure assembly comprised, in part, of an enclosure defining a substantially fluidly sealed air chamber that has at least one air inlet to the air chamber and which is fluidly coupled to the pump.</p> <p>Gen X:</p>  <p>(Photograph of Gen X)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>As seen in the photograph above, tubing connects the pump to the enclosure and to the air inlet to the air chamber of the enclosure. That is, the air inlet to the air chamber is fluidly coupled to the pump.</p> <div data-bbox="676 462 1251 1226" data-label="Image"> </div> <div data-bbox="1419 500 1780 690" data-label="Text"> <p>Air inlet to substantially fluidly sealed air chamber of the enclosure</p> </div> <p>(Photograph of Gen X)</p> <p>As further seen from the photographs below, the enclosure defines an air chamber. The air chamber includes one or more O-rings, which assist in substantially fluidly sealing the air chamber.</p> |

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

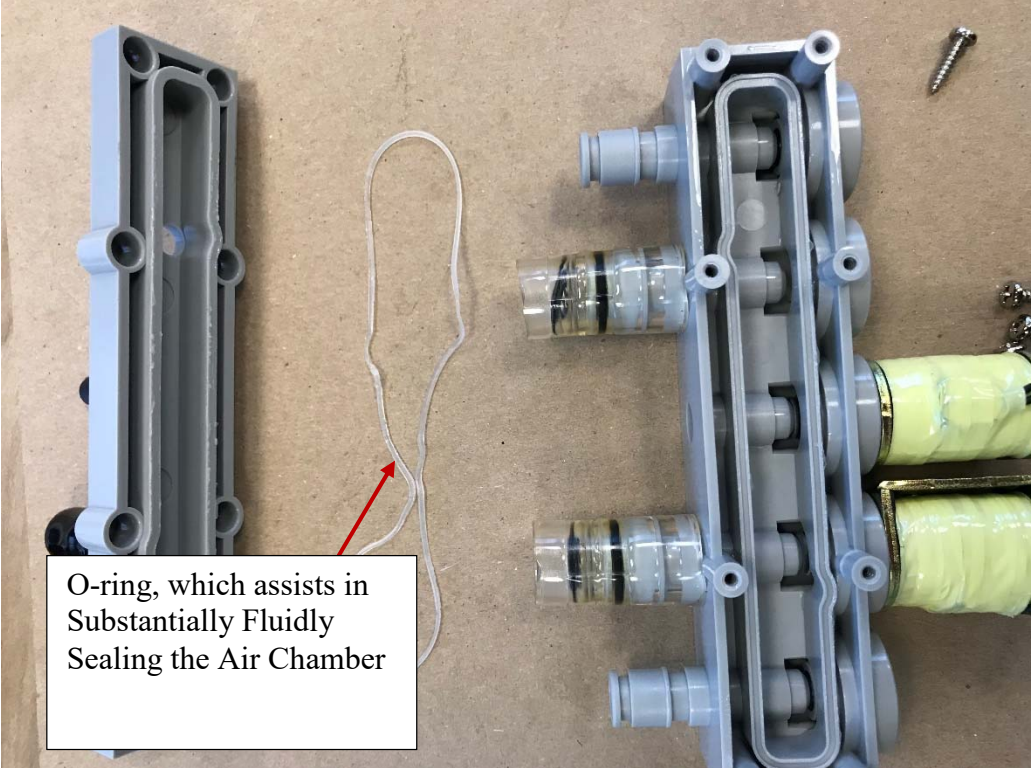
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="730 893 1096 1084">O-ring, which assists in Substantially Fluidly Sealing the Air Chamber</p> <p data-bbox="682 1112 1869 1185">(Photograph of Gen X's enclosure (depicted with the rear-cover and O-ring disassembled for illustrative purposes))</p> |

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

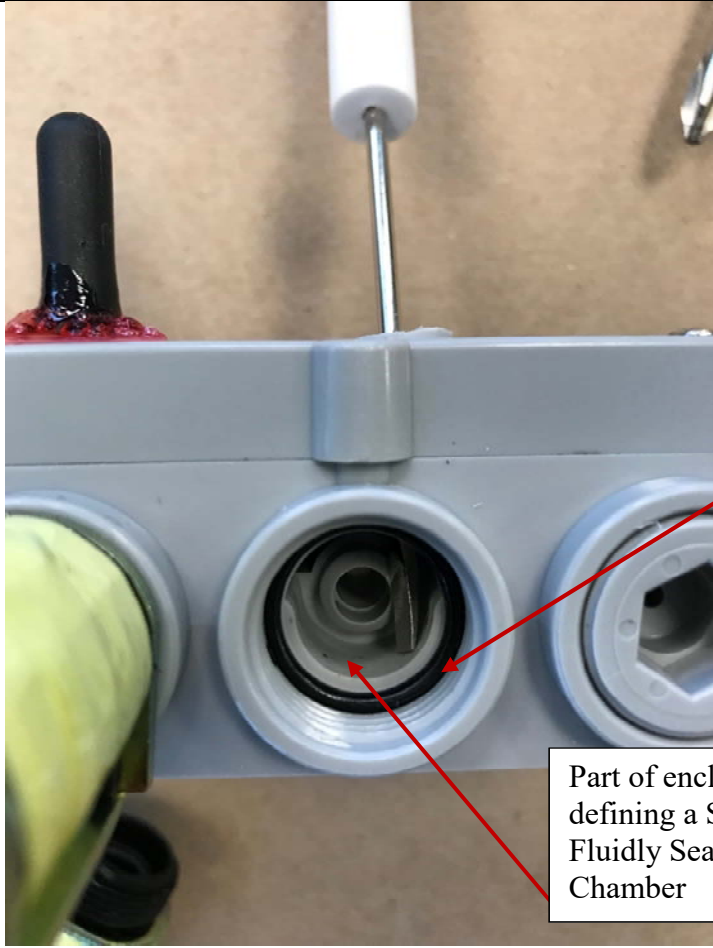
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1549 638 1919 829">O-ring, which assists in Substantially Fluidly Sealing the Air Chamber</p> <p data-bbox="1226 1081 1591 1253">Part of enclosure defining a Substantially Fluidly Sealed Air Chamber</p> <p data-bbox="680 1328 1598 1365">(Photograph of Gen X's enclosure (depicted with a solenoid removed).)</p> |

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

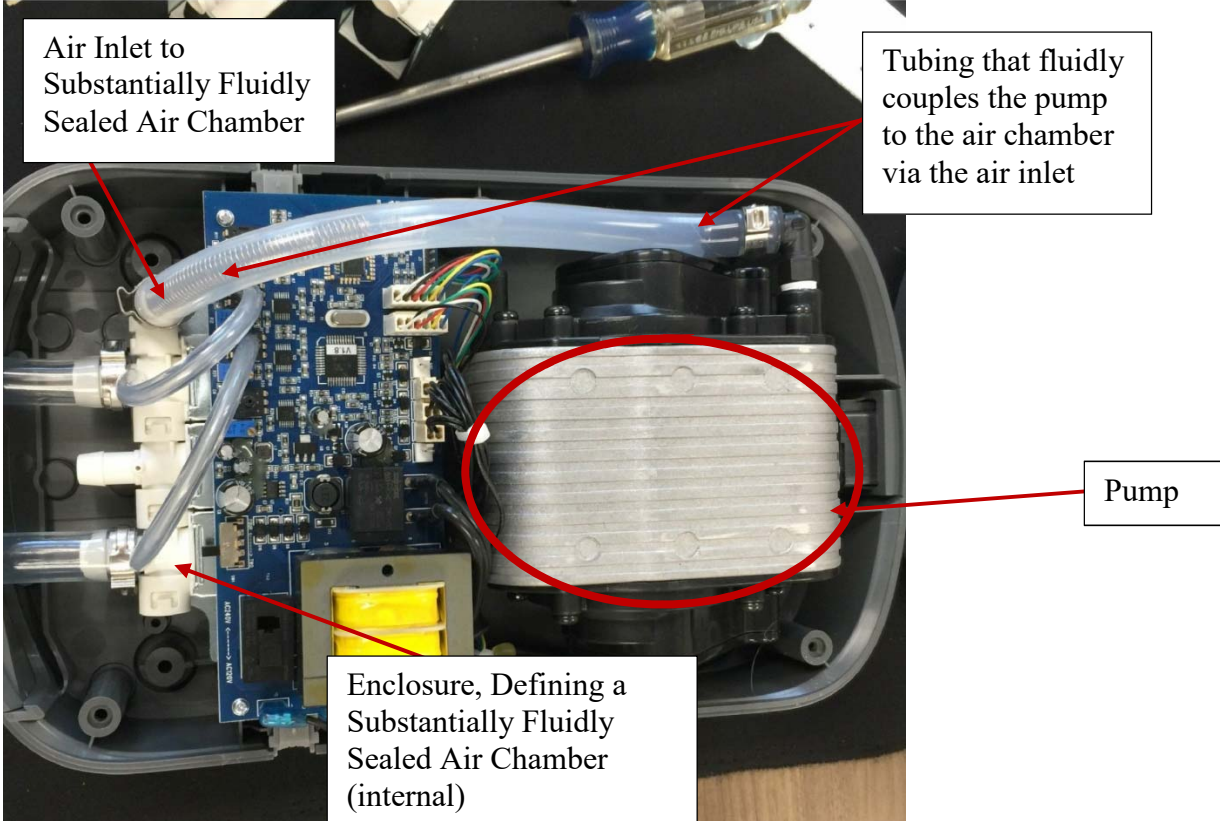
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The Accused Products having a Gen 3 Koge air controller include an enclosure defining a substantially fluidly sealed air chamber that has at least one air inlet to the air chamber, which is fluidly coupled to the pump.</p> <p>Gen 3 Koge:</p>  <p>(Photograph of Gen 3 Koge)</p> |

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

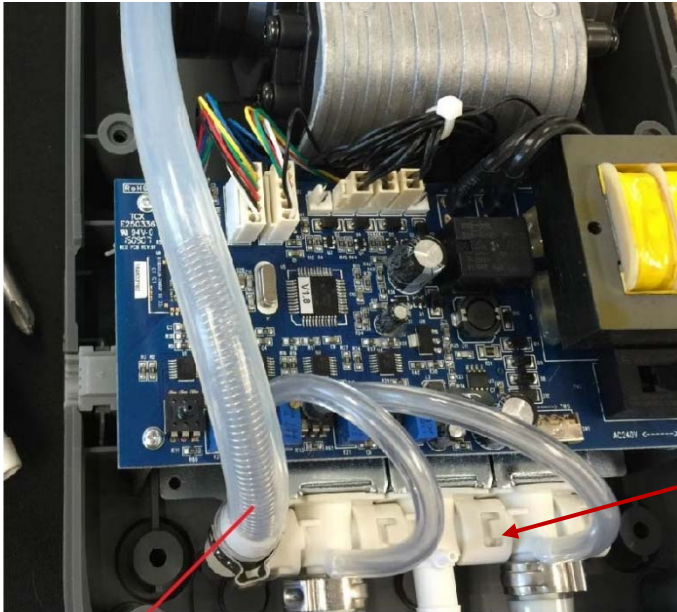
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>As seen in the photograph above, tubing connects the pump to the enclosure and to the air inlet to the air chamber of the enclosure. That is, the air inlet to the air chamber is fluidly coupled to the pump.</p>  <p>Inlet to substantially fluidly sealed enclosure (Photograph of Gen 3 Koge)</p> <p>Enclosure, which defines a Substantially Fluidly Sealed Air Chamber</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>As further seen from the photographs below, the enclosure defines an air chamber. The air chamber includes one or more interlocking connectors, which assist in substantially fluidly sealing the air chamber.</p> <div data-bbox="680 500 1480 1299" data-label="Image"> </div> <p>(Photograph of Gen 3 Koge)</p> |

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

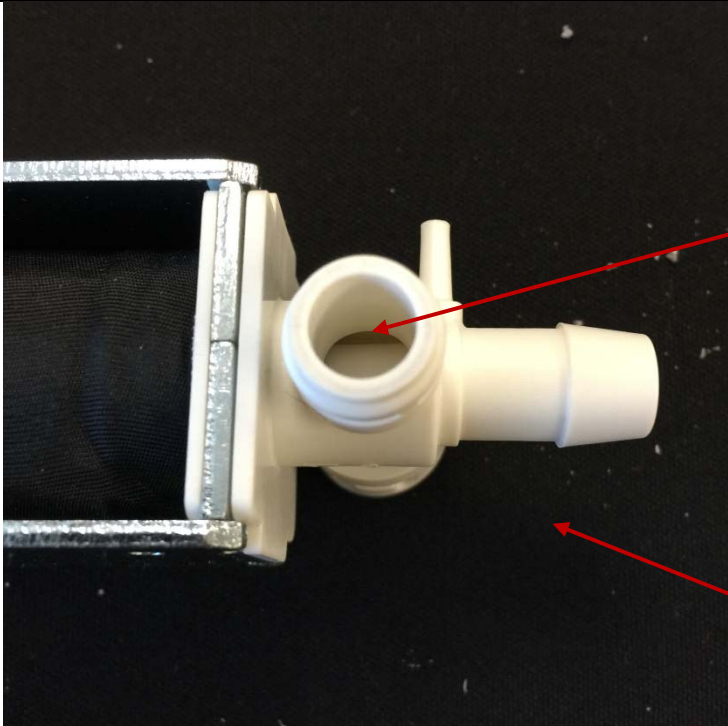
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="1438 474 1818 620">Substantially Fluidly Sealed Air Chamber</p> <p data-bbox="1524 902 1787 1024">Enclosure</p> <p data-bbox="680 1068 1902 1105">(Photograph of Gen 3 Koge's enclosure (depicted detached from other enclosure components).)</p> <p data-bbox="680 1159 1990 1409">When the Gen 3 and Gen X air controllers inflate the one or more air bladders, the pump, tubing that connects the pump to the air inlet, air chamber, and tubing connecting the air chamber to the one or more air bladders creates a substantially fluidly sealed environment substantially fluidly sealing the air chamber. That is, the enclosure contains several fluid tight seals and the tubing connecting the air bladders and pump to the enclosure creates a fluidly sealed environment such that the air chamber defined by the enclosure is substantially fluidly sealed. To the extent this limitation is not literally present the limitation is met under the doctrine of equivalents because the substantially fluidly sealed</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>environment performs substantially the same function as a substantially sealed air chamber in substantially the same way and to obtain the substantially same result. Accordingly, the air chamber defined by the enclosure meets the substantially fluidly sealed limitation.</p> <p>The Accused Products having a Gen 3 Arco air controller further include an enclosure being formed of an enclosure portion and a rear cover portion, a flexible seal being compressively interposed between the enclosure portion and a rear cover portion to effect a substantially fluid tight seal therebetween.</p> <p>As seen in the photographs below, the Gen 3 Arco's enclosure of the valve enclosure assembly is comprised of an enclosure portion and a rear cover portion. Furthermore, a flexible seal is compressively interposed between the enclosure portion and the rear cover portion, thereby creating a substantially fluid tight seal between the enclosure portion and the rear cover portion.</p> |

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

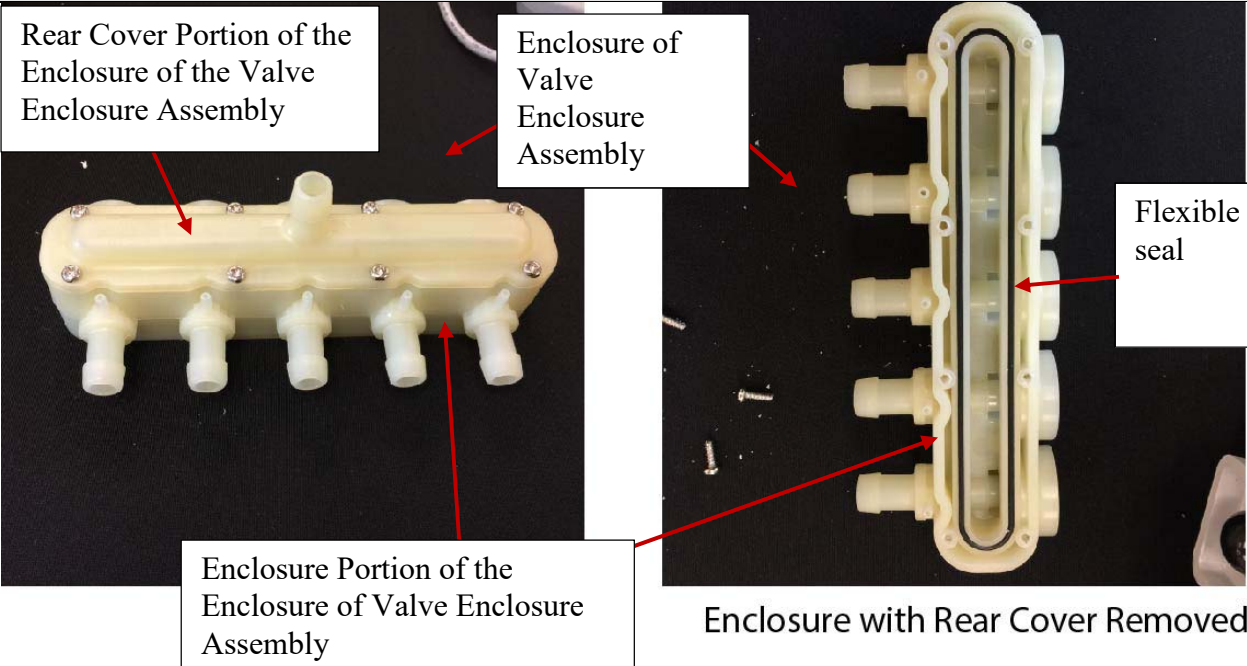
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photograph of the Gen 3 Arco)</p> <p>The Accused Products having a Gen X air controller further include an enclosure being formed of an enclosure portion and a rear cover portion, a flexible seal being compressively interposed between the enclosure portion and a rear cover portion to effect a substantially fluid tight seal therebetween.</p> <p>As seen in the photographs below, the Gen X's enclosure of the valve enclosure assembly is comprised of an enclosure portion and a rear cover portion. Furthermore, a flexible seal is compressively interposed between the enclosure portion and the rear cover portion, thereby creating a substantially fluid tight seal between the enclosure portion and the rear cover portion.</p> |

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

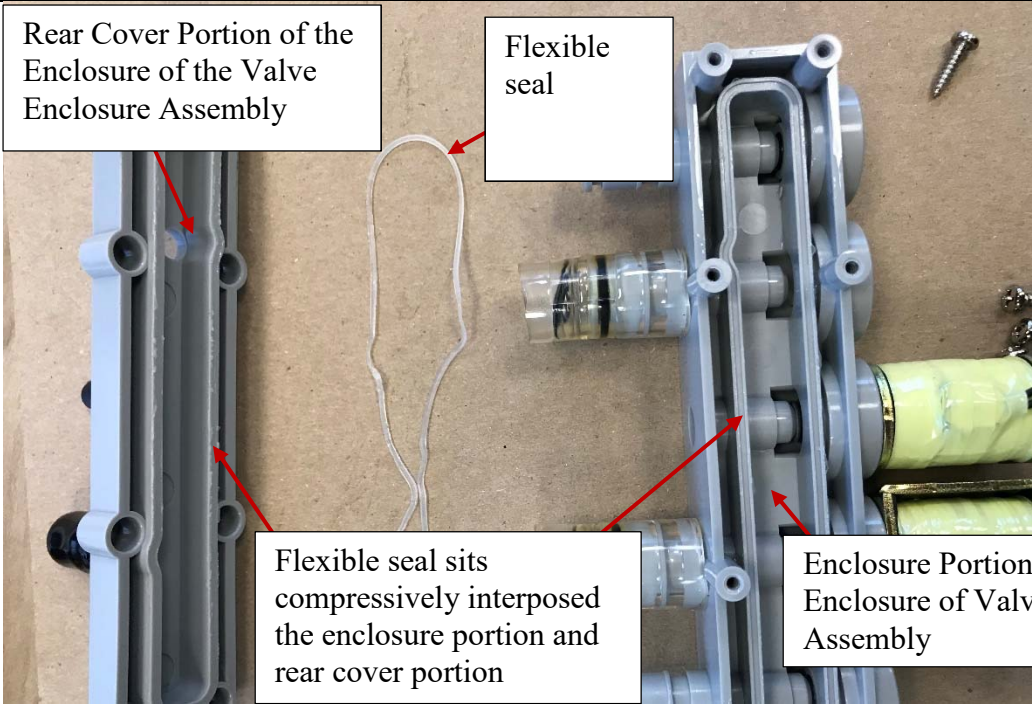
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photograph of the Gen X)</p> <p>As seen in the photographs below, the Gen 3 Koge's enclosure of the valve enclosure assembly is comprised of an enclosure portion and a rear cover portion. Furthermore, a flexible seal is compressively interposed between the enclosure portion and the rear cover portion, thereby creating a substantially fluid tight seal between the enclosure portion and the rear cover portion.</p> |

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

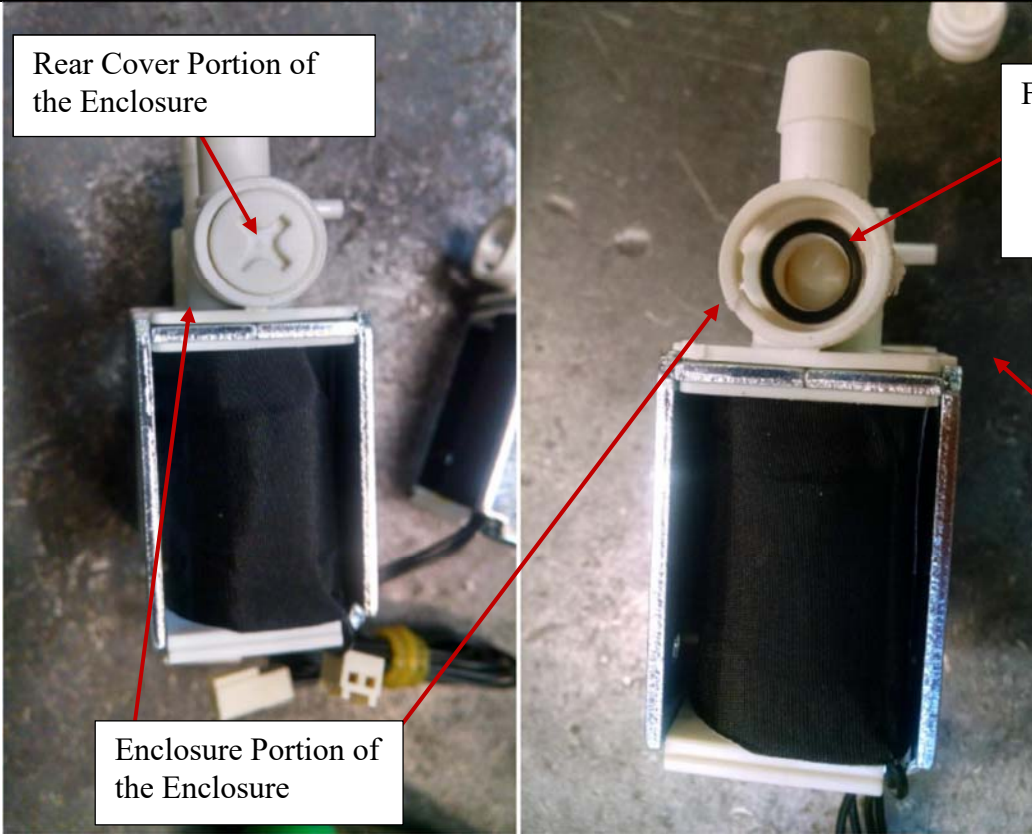
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---|---|
| |  <p data-bbox="693 373 1050 470">Rear Cover Portion of the Enclosure</p> <p data-bbox="777 1055 1071 1153">Enclosure Portion of the Enclosure</p> <p data-bbox="1680 397 1953 592">Flexible Seal</p> <p data-bbox="1722 690 1984 909">Enclosure of Valve Enclosure Assembly with Rear Cover Portion Removed</p> <p data-bbox="680 1177 1092 1209">(Photograph of the Gen 3 Koge)</p> |
| <p data-bbox="105 1274 640 1412">[6.2] pressure monitor means being operably coupled to the processor and being in fluid communication with the at least one bladder for continuously</p> | <p data-bbox="680 1266 1942 1404">The “pressure monitor means” is a means-plus-function limitation subject to pre-AIA 35 U.S.C. § 112, ¶ 6. The function is continuously monitoring the pressure in the at least one bladder. The structure is a port fluidly coupled to the interior of the valve enclosure assembly that is designed to receive a tube, a pressure sensor, and a tube connected to the port and to the pressure sensor, and</p> |

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

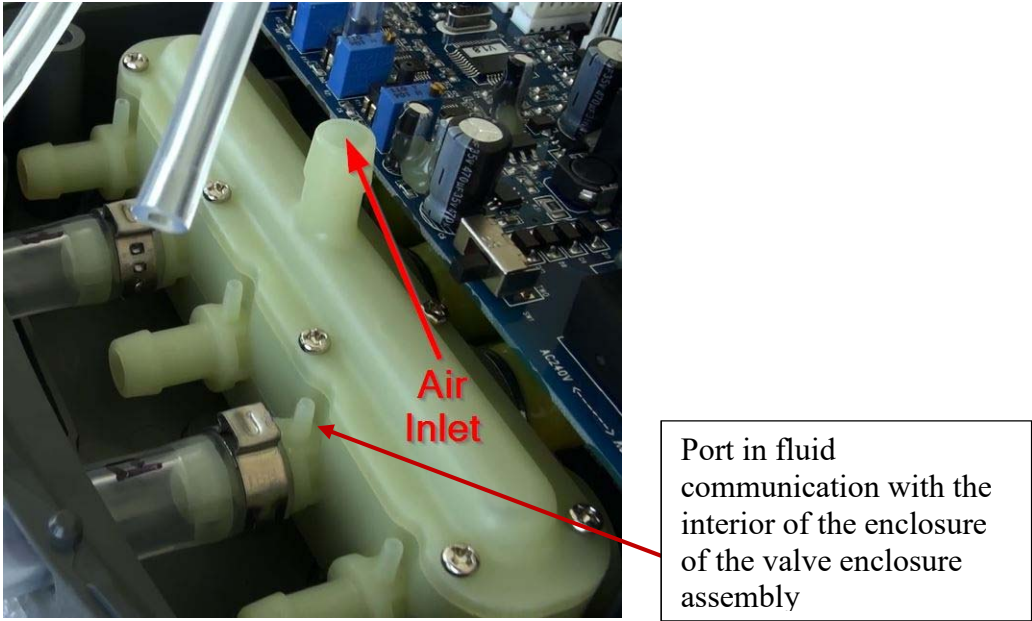
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---|---|
| <p>monitoring the pressure in the at least one bladder.</p> | <p>equivalents thereof. Under this construction, and where the other claim terms are given their plan and ordinary meaning in light of the specification, the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers include a pressure monitor means being operably coupled to the processor and being in fluid communication with the at least one bladder for continuously monitoring the pressure in the at least one bladder.</p> <p>The valve enclosure assembly of the Accused Products having a Gen 3 Arco air controller include a pressure monitor means operably coupled to the processor. Specifically, the valve enclosure assembly of the Gen 3 Arco includes a pressure monitoring port, which is capable of being in fluid communication with the interior of the valve enclosure assembly.</p> <p>Gen 3 Arco:</p>  <p>(Photograph of Gen 3 Arco)</p> |

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

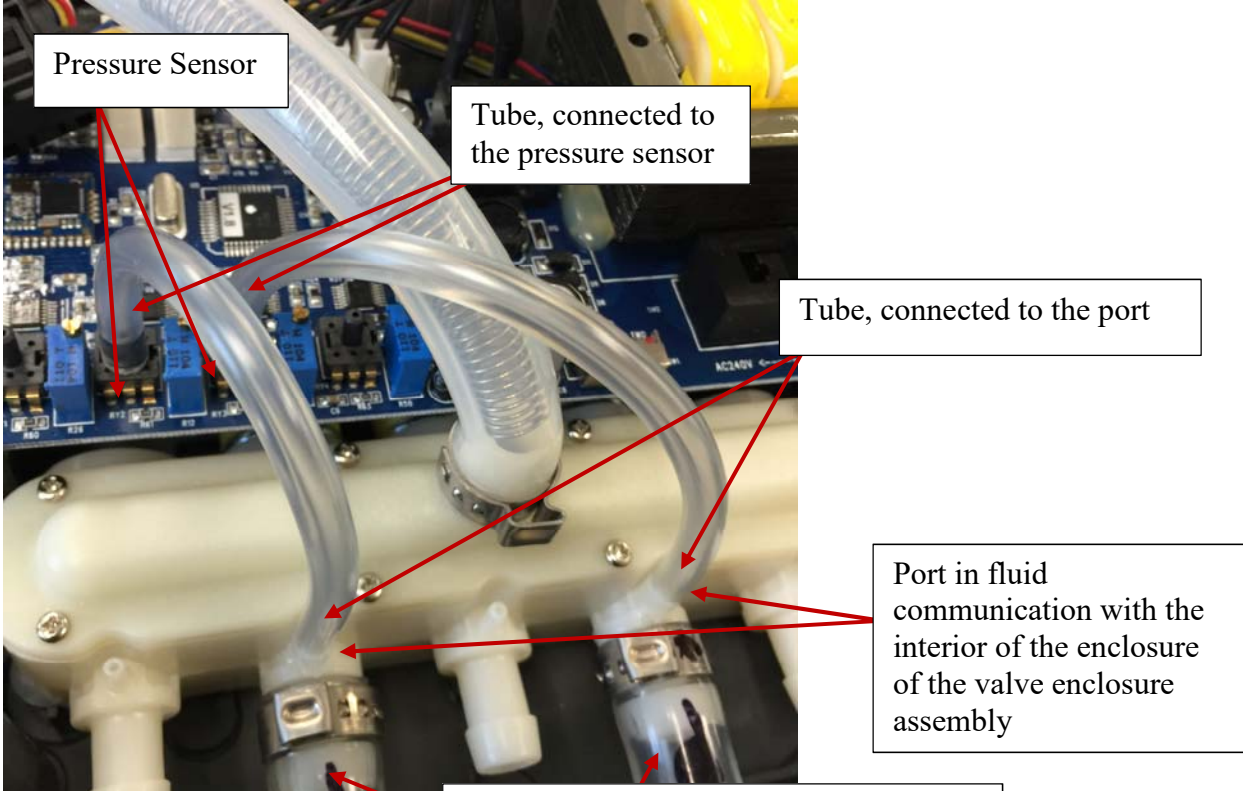
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>As seen, a tube is connected to the pressure monitoring port. The tube is also connected to a pressure sensor. In addition, and as discussed above, the pressure in the one or more air bladders is conveyed to the valve enclosure assembly via tubing that fluidly couples the enclosure to the air bladder(s). The bladder pressure is conveyed to the pressure sensor from the pressure monitoring port.</p>  <p>(Photograph of the Gen 3 Arco)</p> <p>Pressure Sensor</p> <p>Tube, connected to the pressure sensor</p> <p>Tube, connected to the port</p> <p>Port in fluid communication with the interior of the enclosure of the valve enclosure assembly</p> <p>Tubing Fluidly Coupling the Valve Enclosure Assembly to an Air Bladder</p> |

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

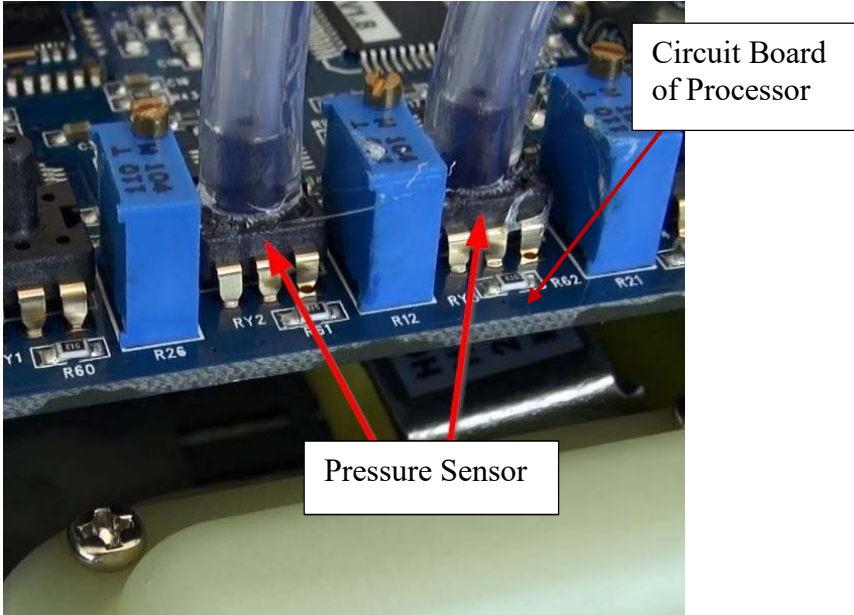
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The pressure sensor is operatively coupled to a processor. The processor is configured to monitor and capable of continuously monitoring the pressure detected by the pressure sensor.</p>  <p>(Photograph of Gen 3 Arco)</p> <p>The pressure monitor means is in fluid communication with the at least one air bladder and capable of continuously monitoring the pressure in the at least one bladder. Tubing connects the pressure sensor(s) to the pressure monitoring port(s) of the enclosure, the pressure sensor is capable of being in fluid communication with the enclosure of the valve enclosure assembly. Tubing fluidly couples the enclosure to the air bladder(s). The pressure sensor and the processor are therefore capable of continuously monitoring the pressure in the air bladder(s).</p> |

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

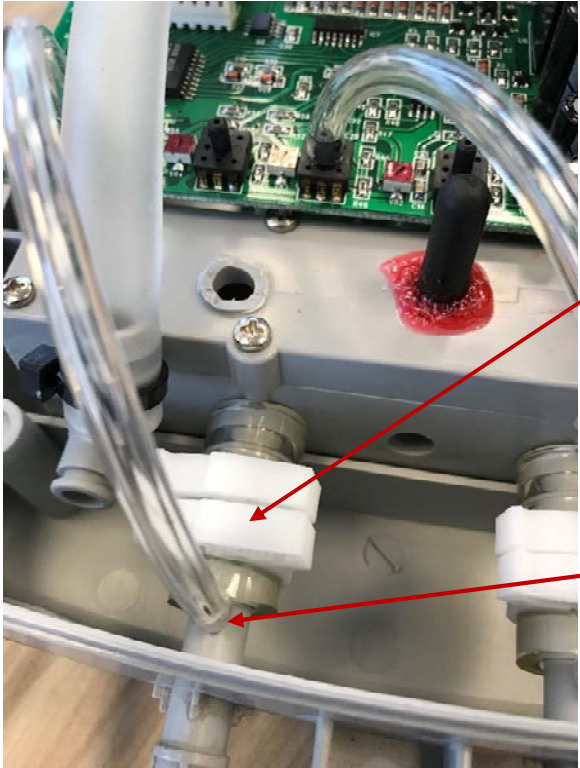
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The valve enclosure assembly of the Accused Products having a Gen X air controller include a pressure monitor means operably coupled to the processor. Specifically, the valve enclosure assembly of the Gen X includes a pressure monitoring port, which is capable of being in fluid communication with the interior of the valve enclosure assembly.</p> <p>Gen X:</p>  <p>(Photograph of Gen X)</p> <div data-bbox="1323 719 1690 917" style="border: 1px solid black; padding: 5px;"> <p>Port to interior of the enclosure of the valve enclosure assembly</p> </div> <div data-bbox="1335 1088 1696 1198" style="border: 1px solid black; padding: 5px;"> <p>Pressure monitoring port</p> </div> |

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

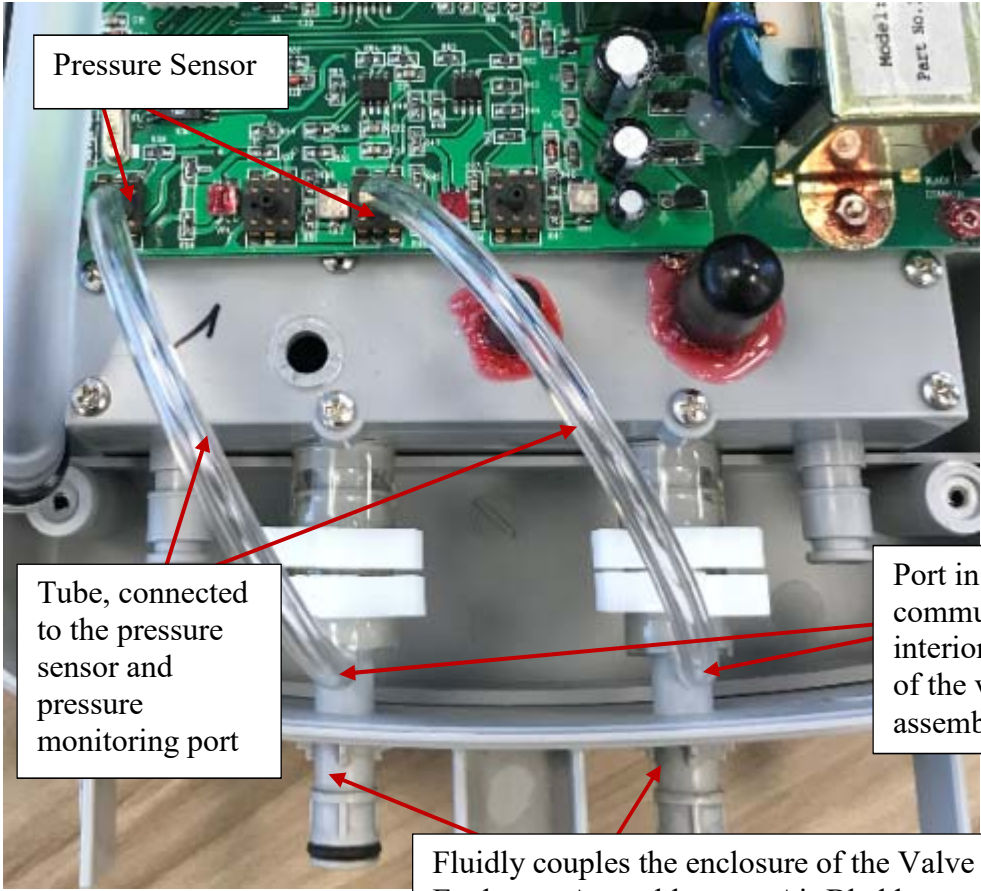
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>As seen, a tube is connected to the pressure monitoring port and to a pressure sensor. In addition, and as discussed above, the pressure in the one or more air bladders is conveyed to the valve enclosure assembly via tubing that fluidly couples the enclosure to the air bladder(s). The bladder pressure is conveyed to the pressure sensor from the pressure monitoring port.</p>  <p>The photograph shows a green printed circuit board (PCB) with a pressure sensor mounted on it. Two clear plastic tubes are connected to the sensor. One tube is connected to a port on the valve enclosure assembly, and the other is connected to a pressure monitoring port. Red arrows point from text boxes to these components. The text boxes are: 'Pressure Sensor' (pointing to the sensor on the PCB), 'Tube, connected to the pressure sensor and pressure monitoring port' (pointing to the tube connecting the sensor to the monitoring port), 'Port in fluid communication with the interior of the enclosure of the valve enclosure assembly' (pointing to the port on the enclosure), and 'Fluidly couples the enclosure of the Valve Enclosure Assembly to an Air Bladder' (pointing to the tube connecting the enclosure to the air bladder).</p> <p>(Photograph of the Gen X)</p> |

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

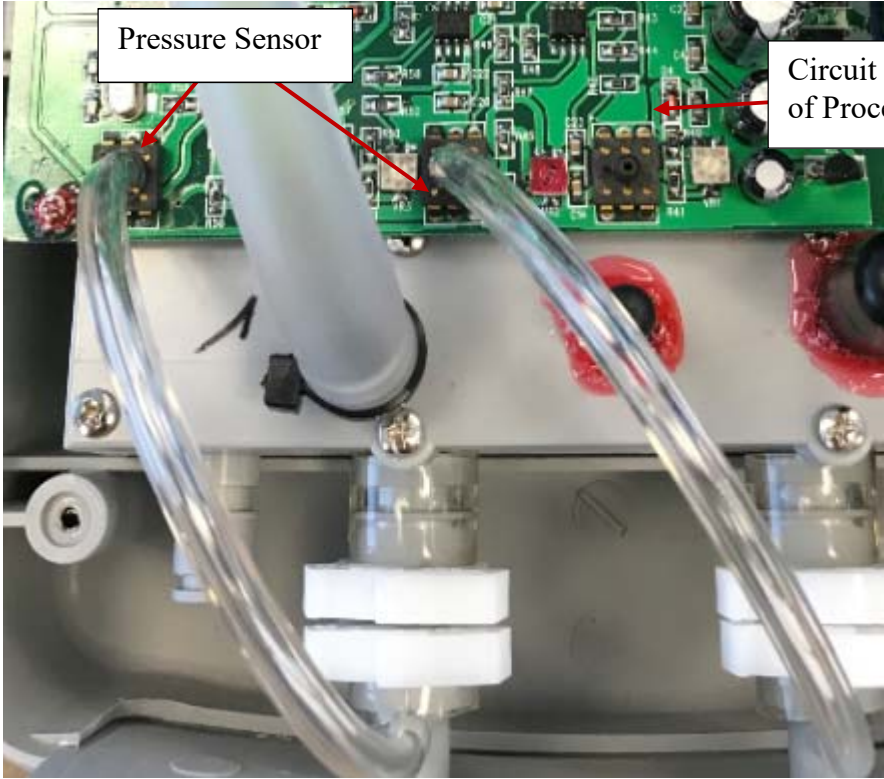
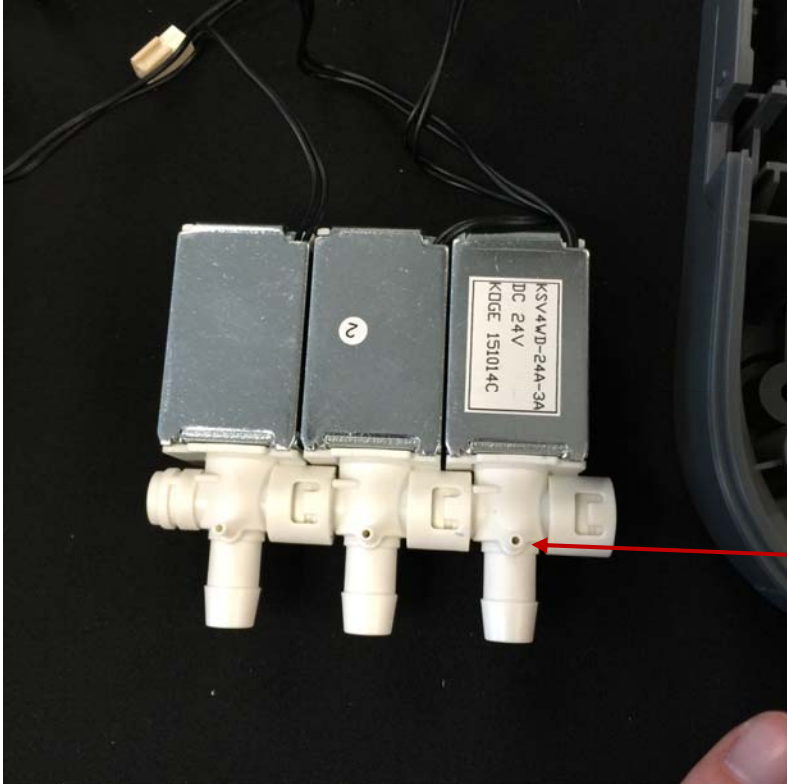
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The pressure sensor is operatively coupled to a processor. The processor is configured to monitor and capable of continuously monitoring the pressure detected by the pressure sensor.</p>  <p>(Photograph of Gen X)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The pressure monitor means is in fluid communication with the at least one air bladder and capable of continuously monitoring the pressure in the at least one bladder. Tubing connects the pressure sensor(s) to the pressure monitoring port(s) of the enclosure, the pressure sensor is capable of being in fluid communication with the enclosure of the valve enclosure assembly. Tubing fluidly couples the enclosure to the air bladder(s). The pressure sensor and the processor are therefore capable of continuously monitoring the pressure in the air bladder(s).</p> <p>The Accused Products having a Gen 3 Koge air controller include pressure monitor means operably coupled to the processor. Specifically, the enclosure of the valve enclosure assembly of the Gen 3 Koge includes a pressure monitoring port in fluid communication with the interior of the enclosure and the air bladder.</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen 3 Koge:</p>  <p>(Photograph of Gen 3 Koge)</p> <p>As seen, a tube is connected to the pressure monitoring port. The tube is also connected to a pressure sensor. In addition, and as discussed above, the pressure in the one or more air bladders is conveyed to the valve enclosure assembly via tubing that fluidly couples the enclosure to the air bladder(s). The air bladder pressure is conveyed to the pressure sensor from the pressure monitoring port.</p> |

Port in fluid communication with the interior of the enclosure of the valve enclosure assembly

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

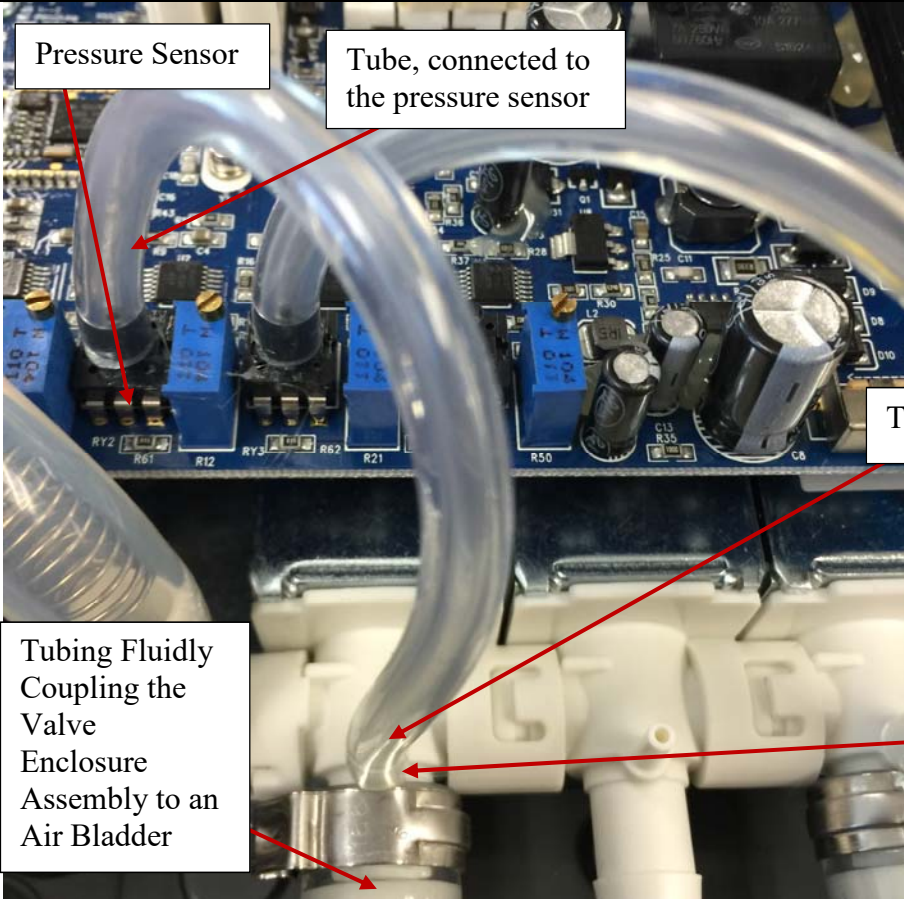
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="695 363 947 423">Pressure Sensor</p> <p data-bbox="1003 363 1297 461">Tube, connected to the pressure sensor</p> <p data-bbox="1541 721 1961 792">Tube, connected to the port</p> <p data-bbox="680 964 926 1198">Tubing Fluidly Coupling the Valve Enclosure Assembly to an Air Bladder</p> <p data-bbox="1583 980 1948 1182">Port in fluid communication with the interior of the enclosure of the valve enclosure assembly</p> <p data-bbox="680 1240 1094 1279">(Photograph of the Gen 3 Koge)</p> <p data-bbox="680 1333 1976 1403">The pressure sensor is operatively coupled to a processor. The processor is configured to monitor and capable of continuously monitoring the pressure detected by the pressure sensor.</p> |

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

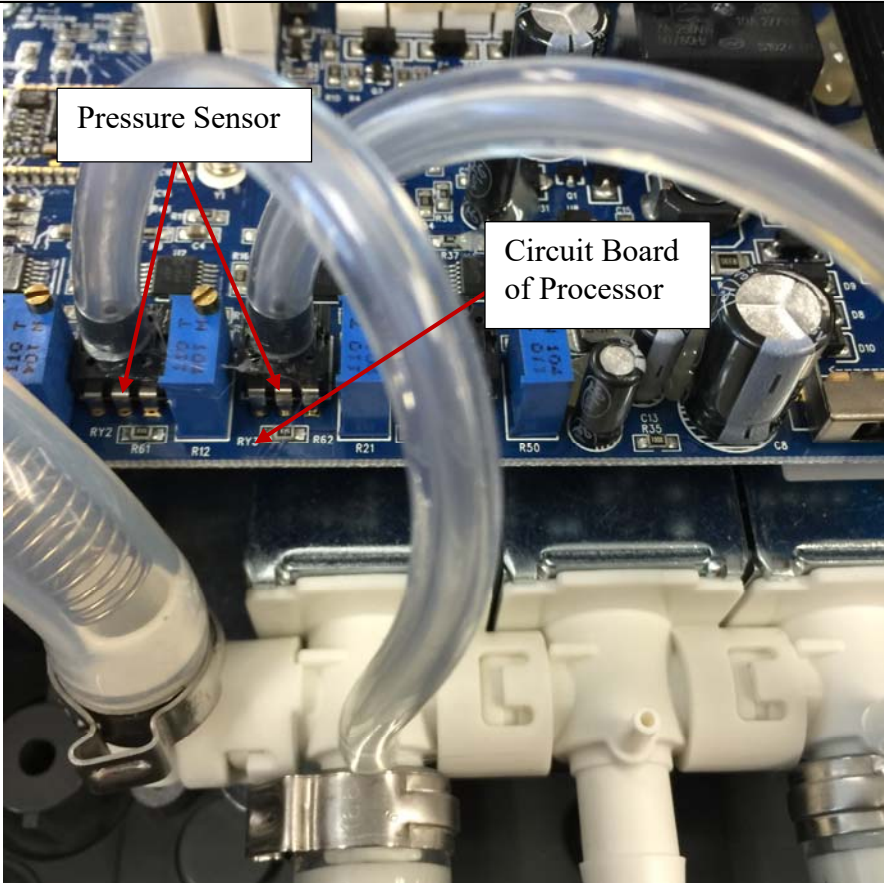
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>(Photograph of Gen 3 Koge)</p> <p>The pressure monitor means is in fluid communication with the at least one air bladder and capable of continuously monitoring the pressure in the at least one bladder. Tubing connects the pressure sensor(s) to the pressure monitoring port(s) of the enclosure, the pressure sensor is capable of being in</p> |

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

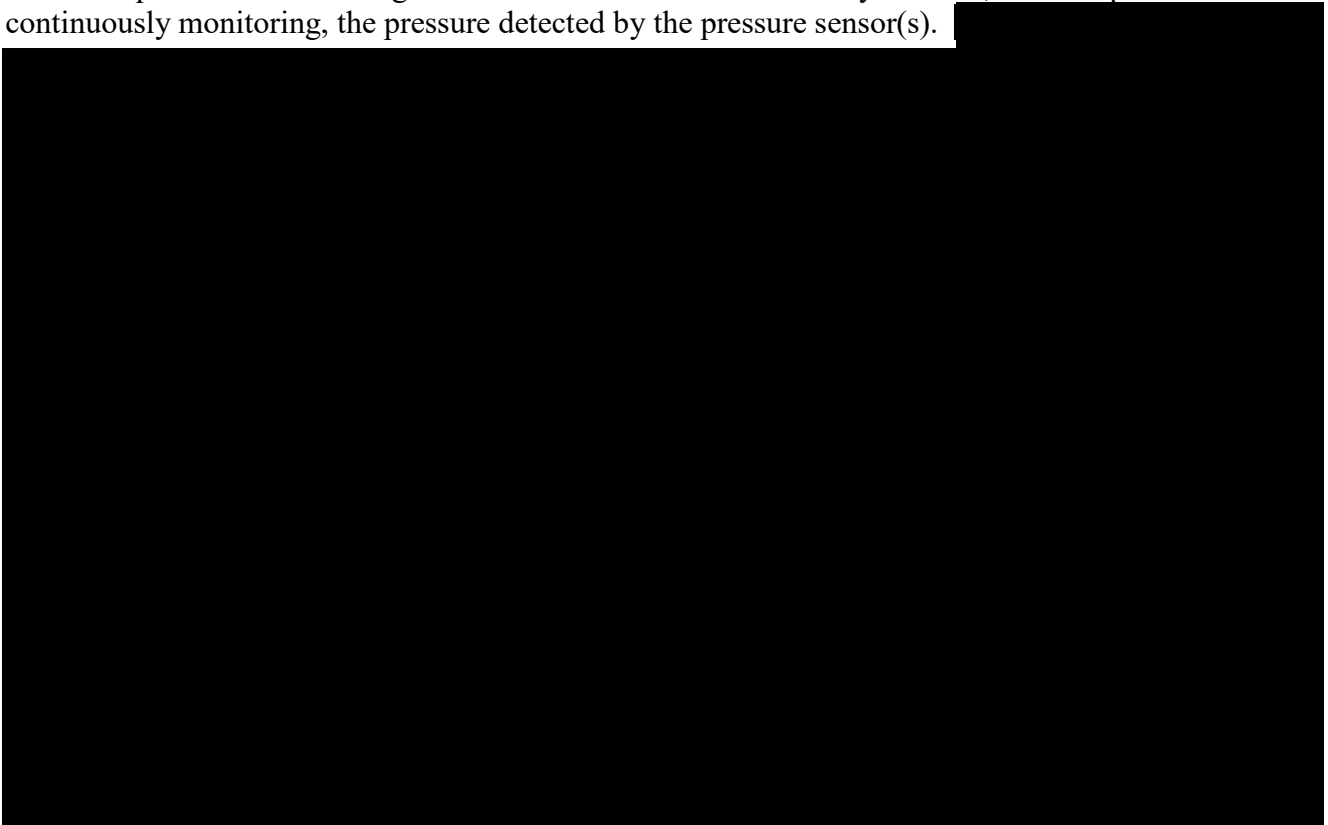
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>fluid communication with the enclosure of the valve enclosure assembly. Tubing fluidly couples the enclosure to the air bladder(s). The pressure sensor and the processor are therefore capable of continuously monitoring the pressure in the air bladder(s).</p> <p>Versions 1.8, 1.97, and 2.0 of ANM's source code further demonstrate that the Gen 3 Accused Products' processors are configured to monitor and do continuously monitor, or are capable of continuously monitoring, the pressure detected by the pressure sensor(s).</p>  |

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

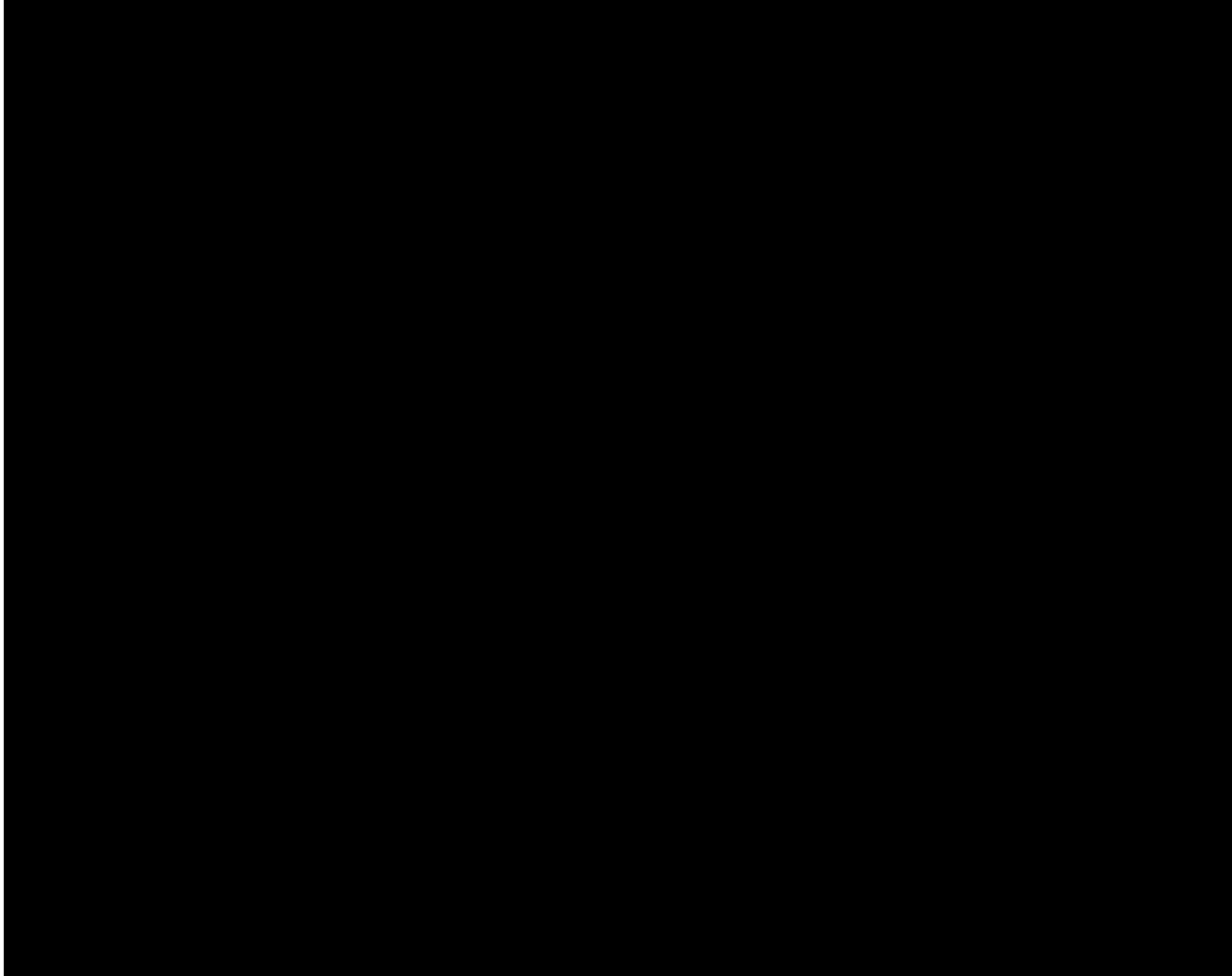
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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EXHIBIT A1 - U.S. PATENT NO. 5,904,172 VERSUS AMERICAN NATIONAL MANUFACTURING ACCUSED PRODUCTS

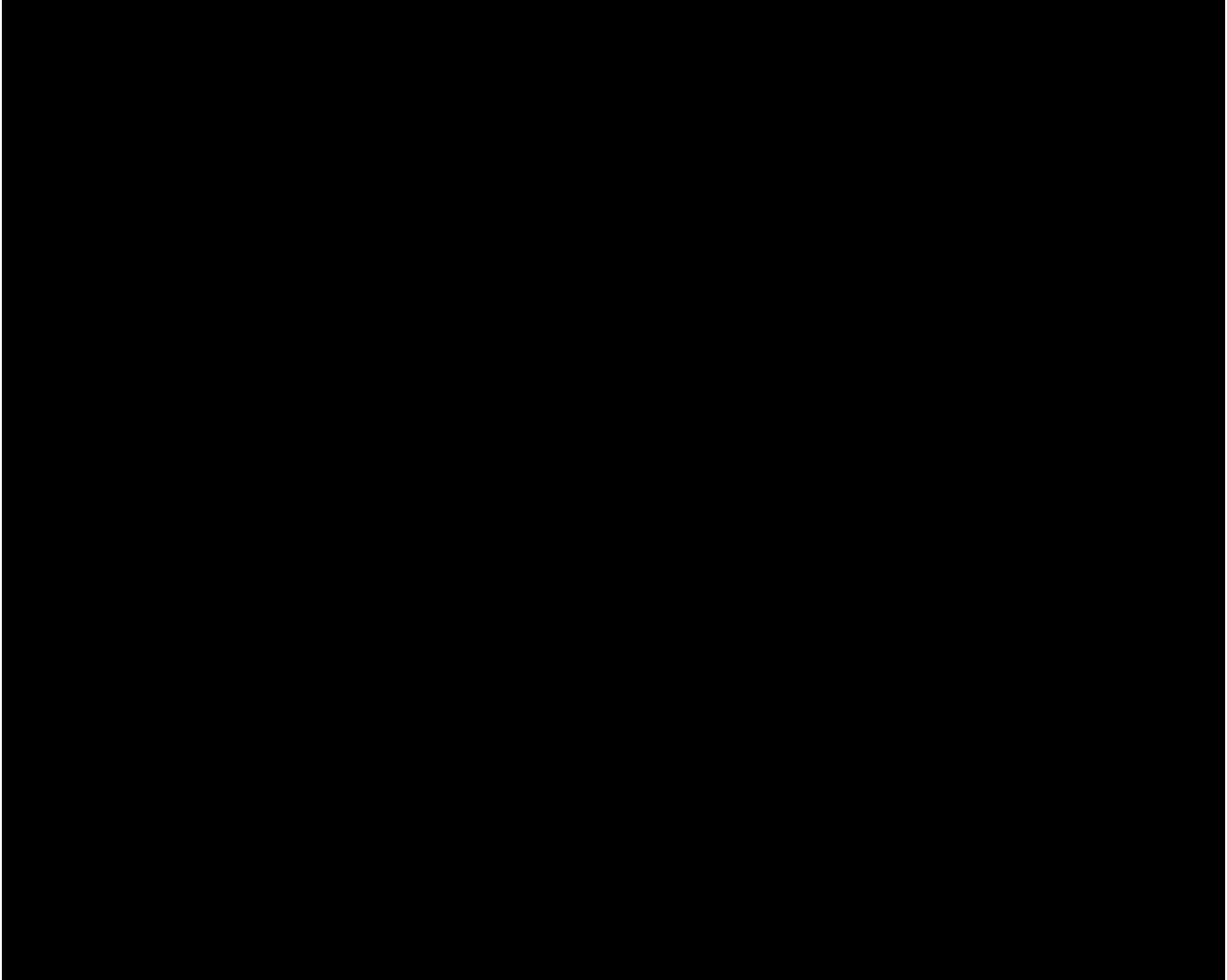
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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EXHIBIT A1 - U.S. PATENT NO. 5,904,172 VERSUS AMERICAN NATIONAL MANUFACTURING ACCUSED PRODUCTS

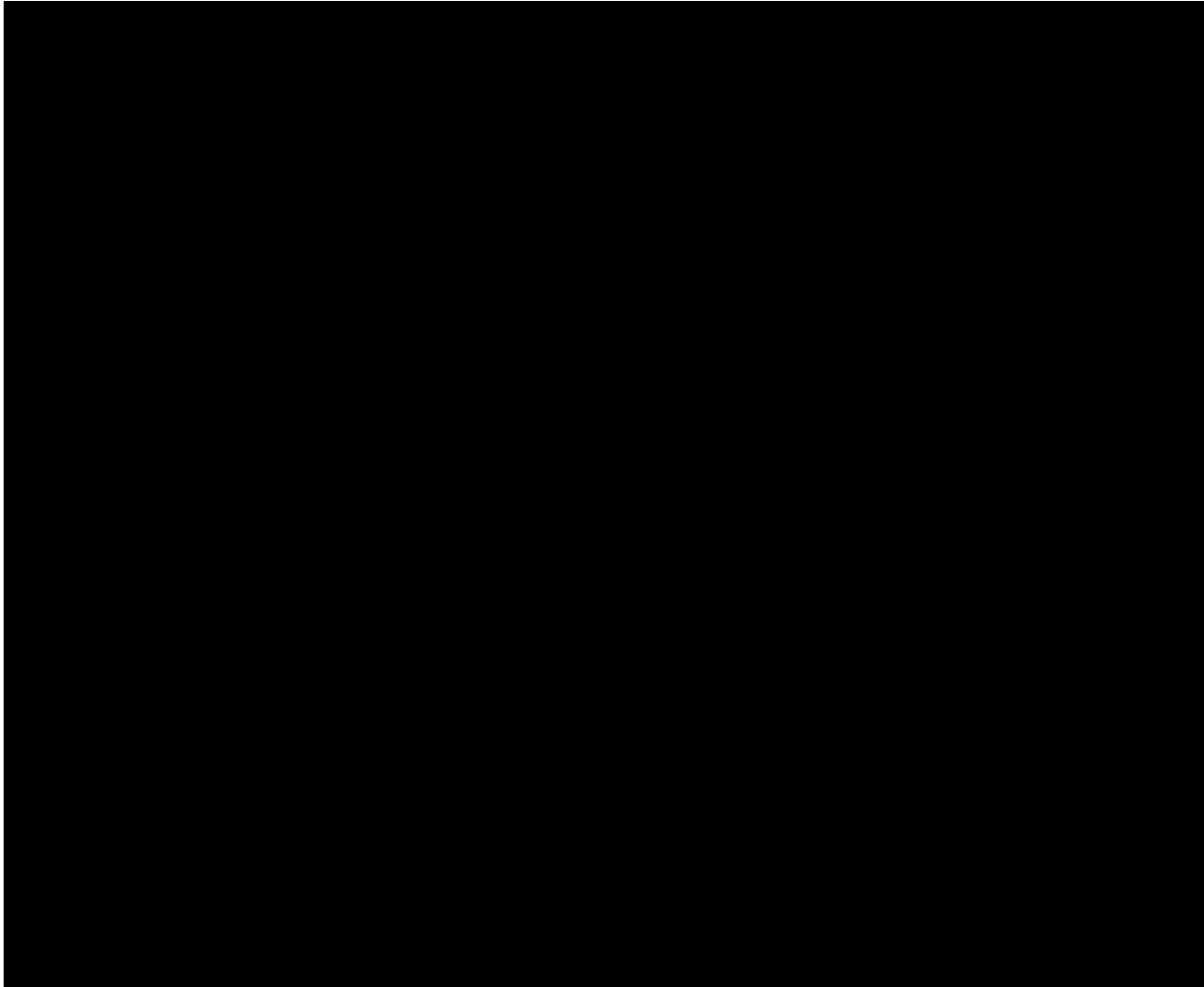
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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EXHIBIT A1 - U.S. PATENT NO. 5,904,172 VERSUS AMERICAN NATIONAL MANUFACTURING ACCUSED PRODUCTS

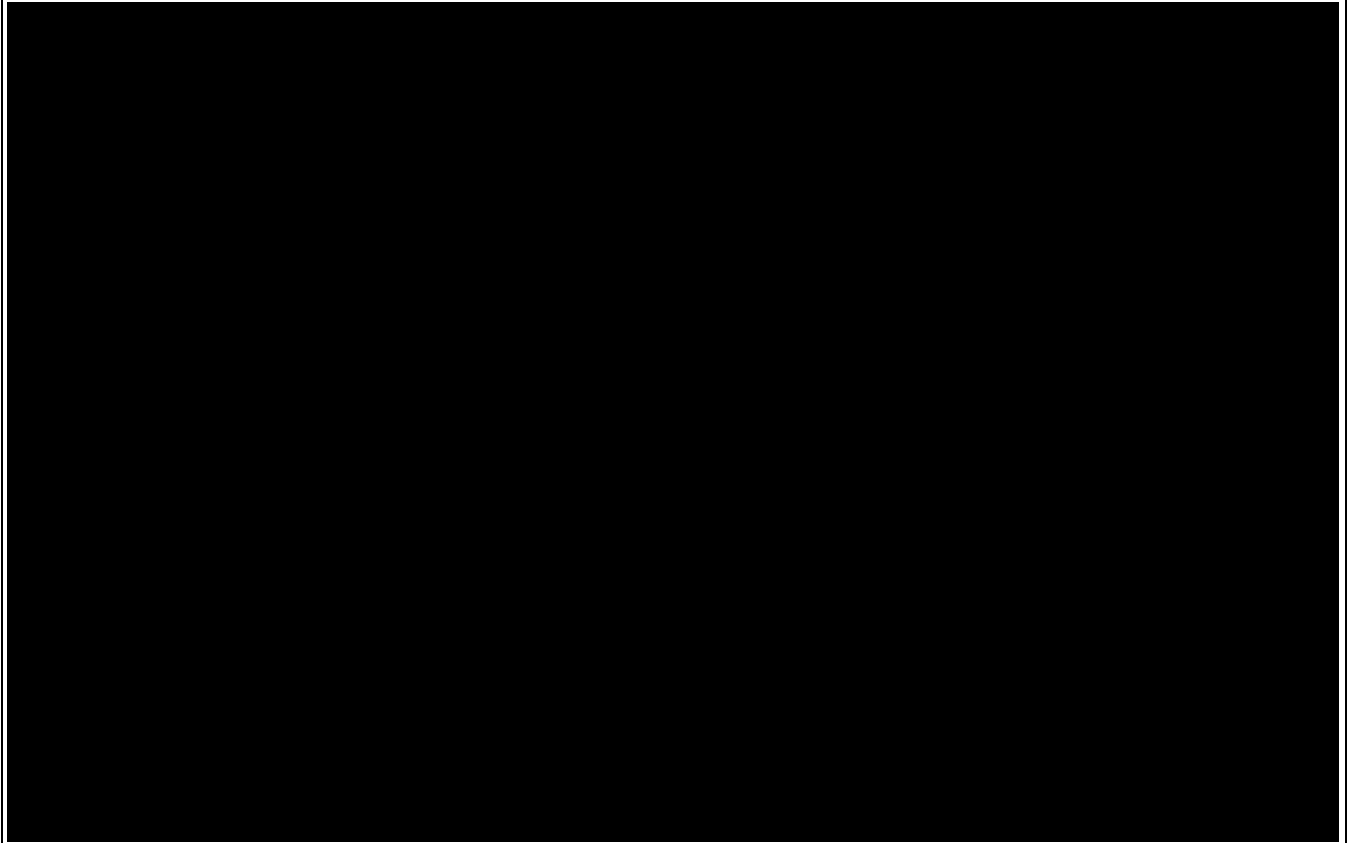
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="676 1221 1976 1401">This limitation may further implicate other electronics, software, firmware, and/or source code of the Accused Products. Additional Source Code for the Accused Products may further show how this claim limitation is met. To resolve a dispute regarding Plaintiff's Notice of Inspection for Source Code, the parties have agreed that Plaintiff shall be allowed to inspect remaining Source Code for the Accused Products on mutually agreeable date(s), after which Plaintiff shall supplement its</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|--|---|
| | infringement contentions, pursuant to an agreed-upon timeline and without opposition, using the information learned during the inspection. |
| Claim 12 | |
| <p>[12.P] 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, comprising:</p> | <p>The preamble of claim 12 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> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <div data-bbox="676 337 1390 1052" data-label="Image"> </div> <div data-bbox="1486 824 1738 977" data-label="Text"> <p>Enclosure of Valve Enclosure Assembly</p> </div> <p data-bbox="676 1058 1045 1101">(Photograph of Gen 3 Arco)</p> <p data-bbox="676 1149 1957 1221">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:</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="680 990 976 1031">(Photograph of Gen X)</p> <p data-bbox="680 1079 1984 1185">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:</p> |

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

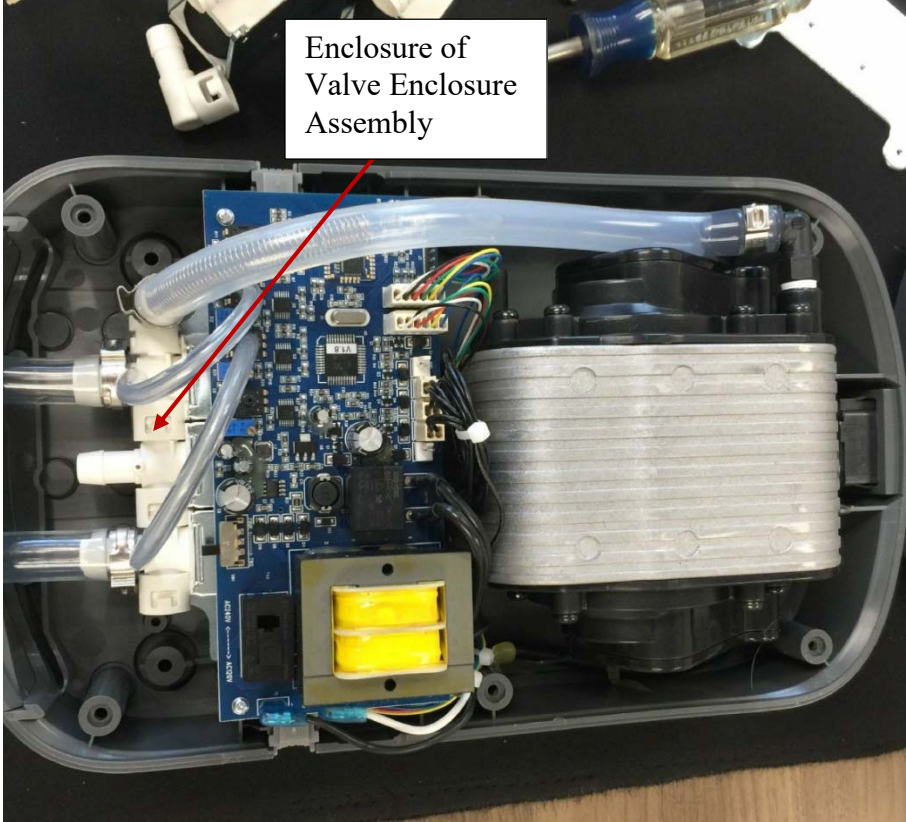
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="961 363 1220 500">Enclosure of Valve Enclosure Assembly</p> <p data-bbox="680 1170 1045 1203">(Photograph of Gen 3 Koge)</p> <p data-bbox="680 1260 1965 1365">The valve enclosure assemblies of the Gen 3 Arco, Gen X, 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.</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1453 381 1722 474">Air Inflatable Mattress</p> <p data-bbox="682 868 997 1015">Air Controller containing the Valve Enclosure Assembly</p> |

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

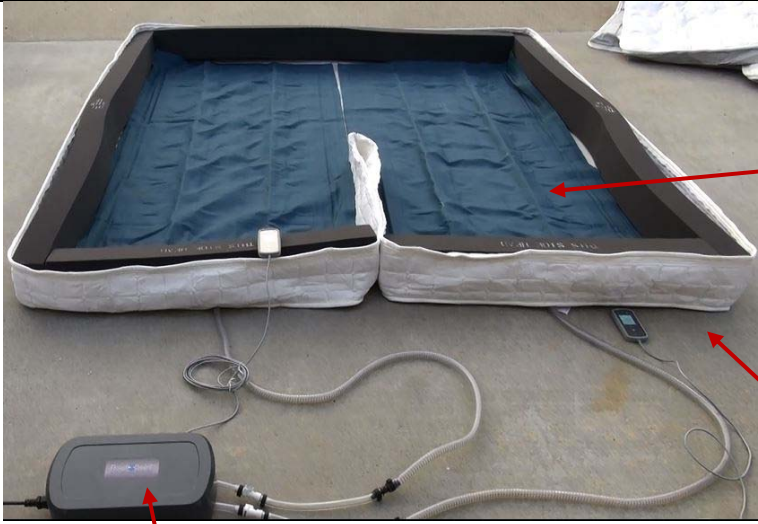
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1497 386 1810 571">Air Bladder of Air Inflatable Mattress, which is inflatable by compressed air</p> <p data-bbox="1497 727 1766 818">Air Inflatable Mattress</p> <p data-bbox="747 886 1062 1029">Air Controller containing the Valve Enclosure Assembly</p> |

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

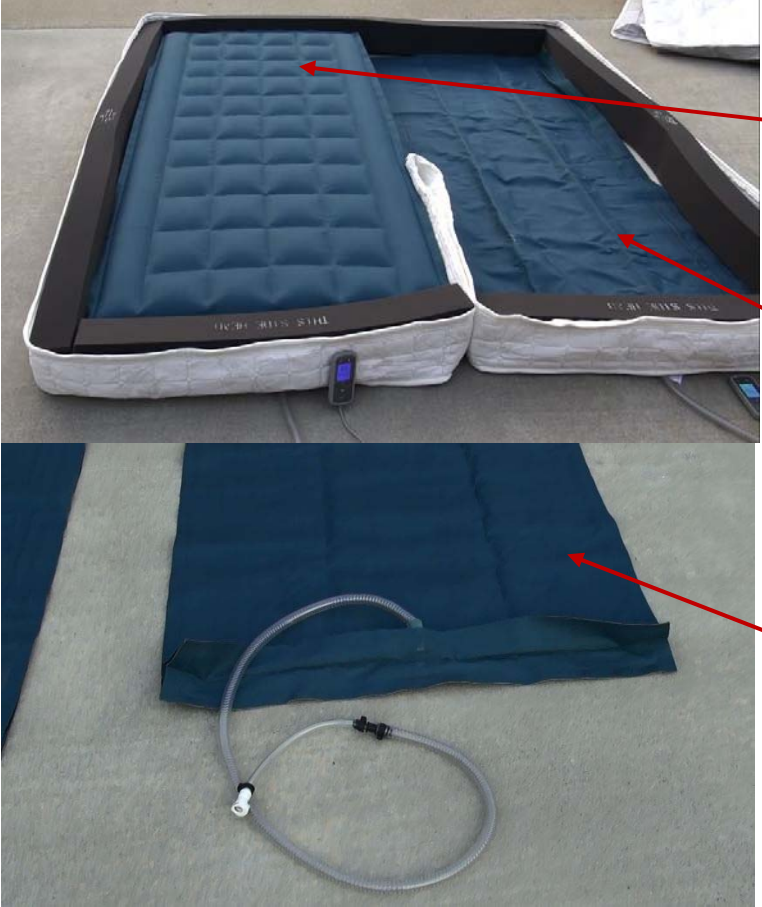
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="1470 357 1774 544">Air Bladder of Air Inflatable Mattress, inflated by compressed air</p> <p data-bbox="1470 568 1774 755">Air Bladder of Air Inflatable Mattress, deflated</p> <p data-bbox="1470 860 1785 1047">Air Bladder of Air Inflatable Mattress, which is inflatable by compressed air</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="703 357 966 446">Air Inflatable Mattress</p> <p data-bbox="1627 381 1942 560">Bladders of Air Inflatable Mattress, which are inflatable by compressed air</p> <p data-bbox="1564 755 1879 901">Air Controller containing the Valve Enclosure Assembly</p> <p data-bbox="682 1006 1249 1047">(Photograph of medical air mattress system)</p> <p data-bbox="682 1096 1963 1421">In the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers, the pump is fluidly coupled to the at least one air bladder for providing compressed air thereto. In the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers, the improved valve enclosure assembly is fluidly coupled intermediate the pump and the at least one air bladder for controlling the inflation of the at least one air bladder. As shown in the photographs below, the pump is fluidly coupled to the enclosure of the valve enclosure assembly via tubing. The enclosure of the valve enclosure assembly is then similarly fluidly coupled to the at least one air bladder with tubing. The pump provides compressed air to the at least one air bladder via the tubing between the pump and the enclosure of the valve enclosure assembly and the tubing between the valve enclosure assembly and the air bladder.</p> |

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

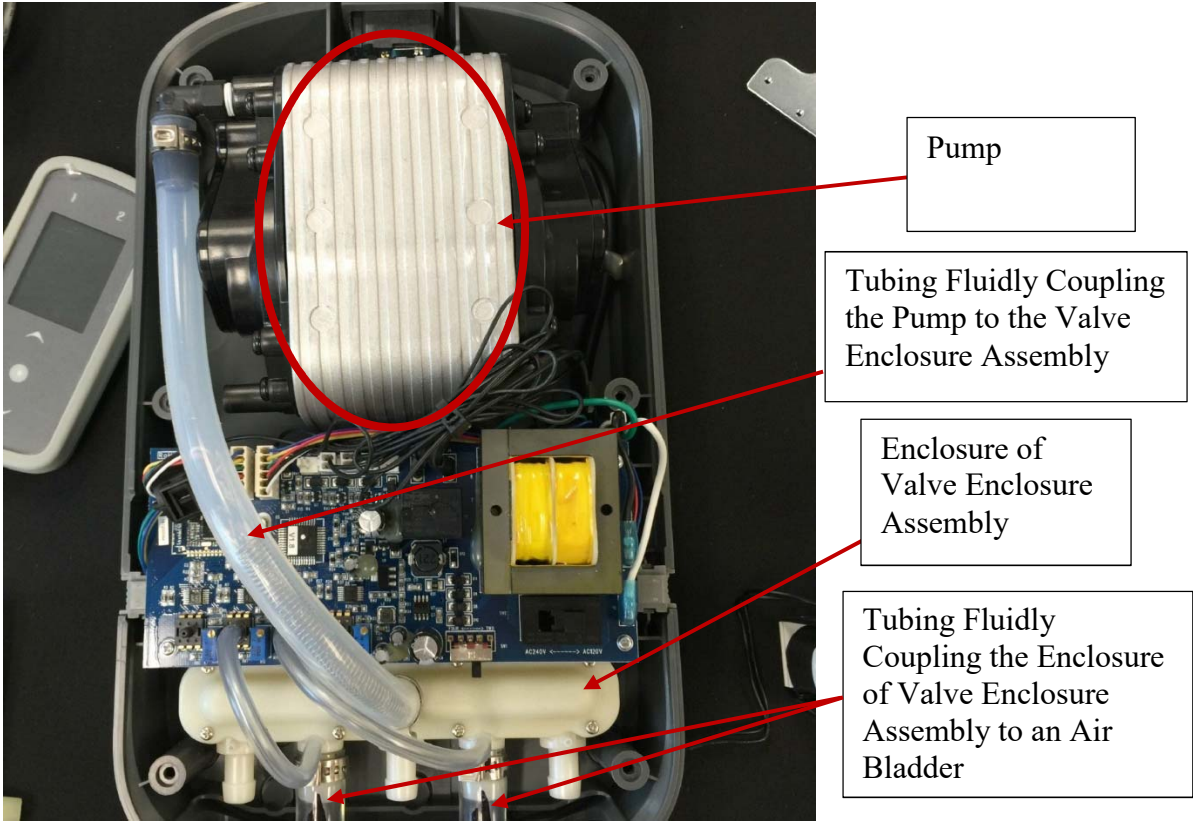
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen 3 Arco:</p>  <p>(Photograph of Gen 3 Arco)</p> |

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

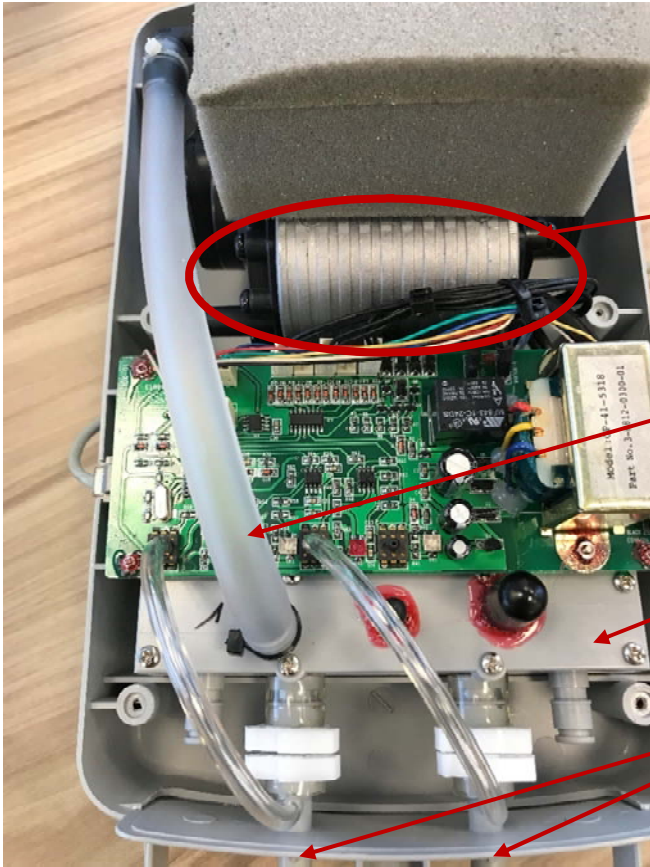
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>Gen X:</p>  <p>(Photograph of Gen X)</p> <p>Pump</p> <p>Tubing Fluidly Coupling the Pump to the Enclosure of the Valve Enclosure Assembly</p> <p>Enclosure of Valve Enclosure Assembly</p> <p>Fluidly Couples the Enclosure of Valve Enclosure Assembly to an Air Bladder</p> |

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

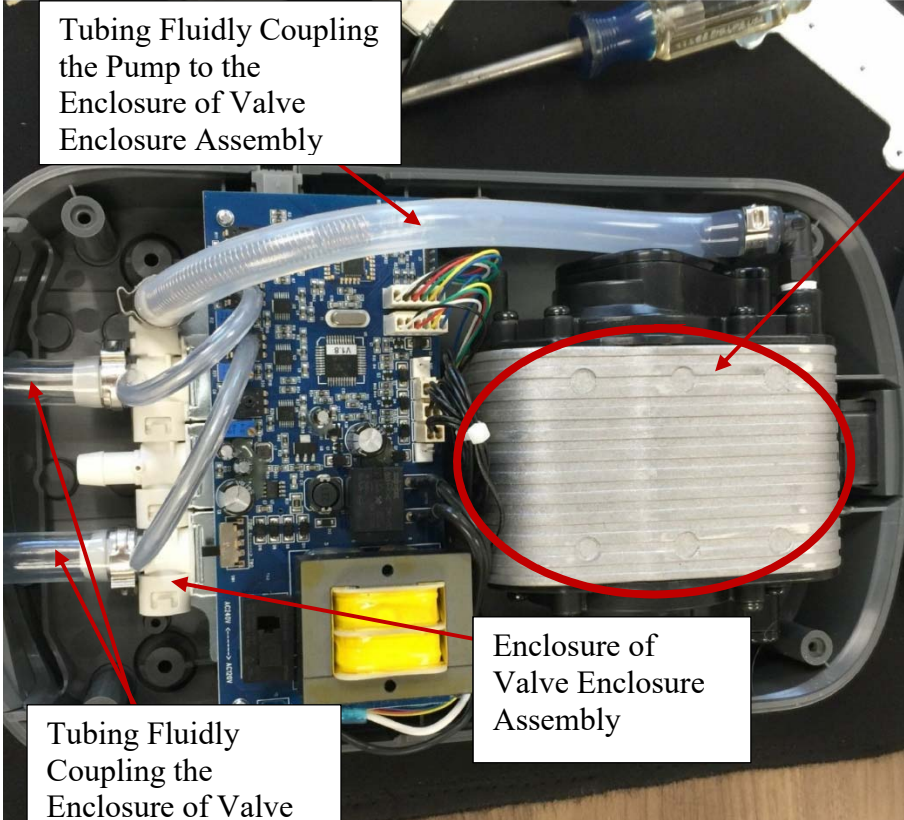
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen 3 Koge:</p>  <p>(Photograph of Gen 3 Koge)</p> |

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

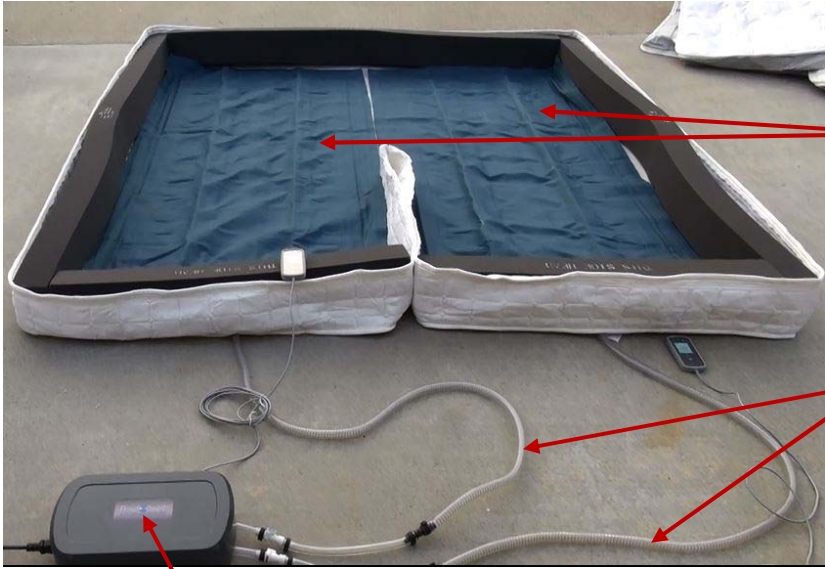
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>As shown in the example of a Gen 3 air controller being used with an inflatable air mattress, the two tubes that fluidly couple to the valve enclosure assembly fluidly couple to the air bladders of the inflatable air mattress. Because the pump is fluidly coupled to the air bladder, the air bladders inflate using the compressed air from the pump.</p>  <p data-bbox="1562 521 1877 708">Air Bladders of Air Inflatable Mattress, which are inflated using compressed air</p> <p data-bbox="1541 753 1848 940">Tubing Fluidly Coupling the Valve Enclosure Assembly to an Air Bladder</p> <p data-bbox="779 1068 1094 1211">Air Controller containing the Valve Enclosure Assembly</p> <p>In the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers, a processor provides commands to the improved valve enclosure assembly during an inflate/deflate cycle:</p> |

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

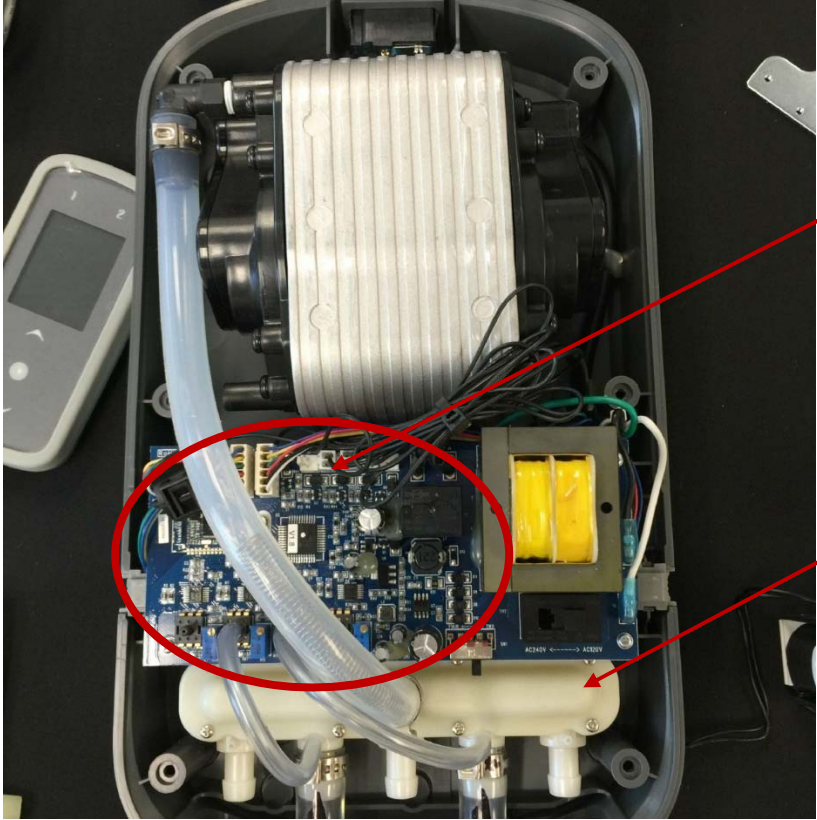
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen 3 Arco:</p>  <p>Printed Circuit Board for Processor, which provides commands to the improved valve enclosure assembly during an inflate/deflate cycle</p> <p>Enclosure of Valve Enclosure Assembly</p> <p>(Photograph of Gen 3 Arco)</p> |

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

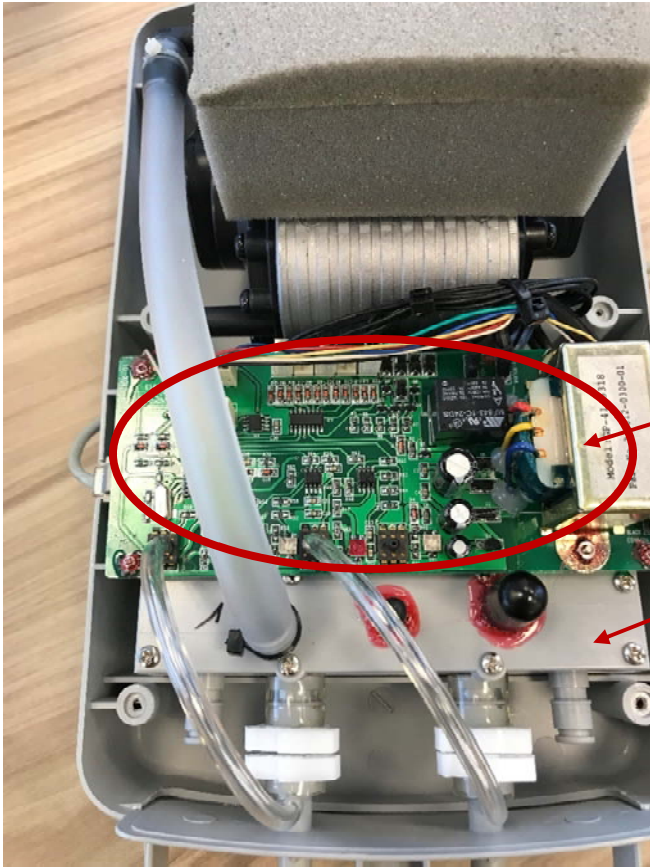
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen X:</p>  <p>(Photograph of Gen X)</p> <p>Printed Circuit Board for Processor, which provides commands to the improved valve enclosure assembly during an inflate/deflate cycle</p> <p>Enclosure of Valve Enclosure Assembly</p> |

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

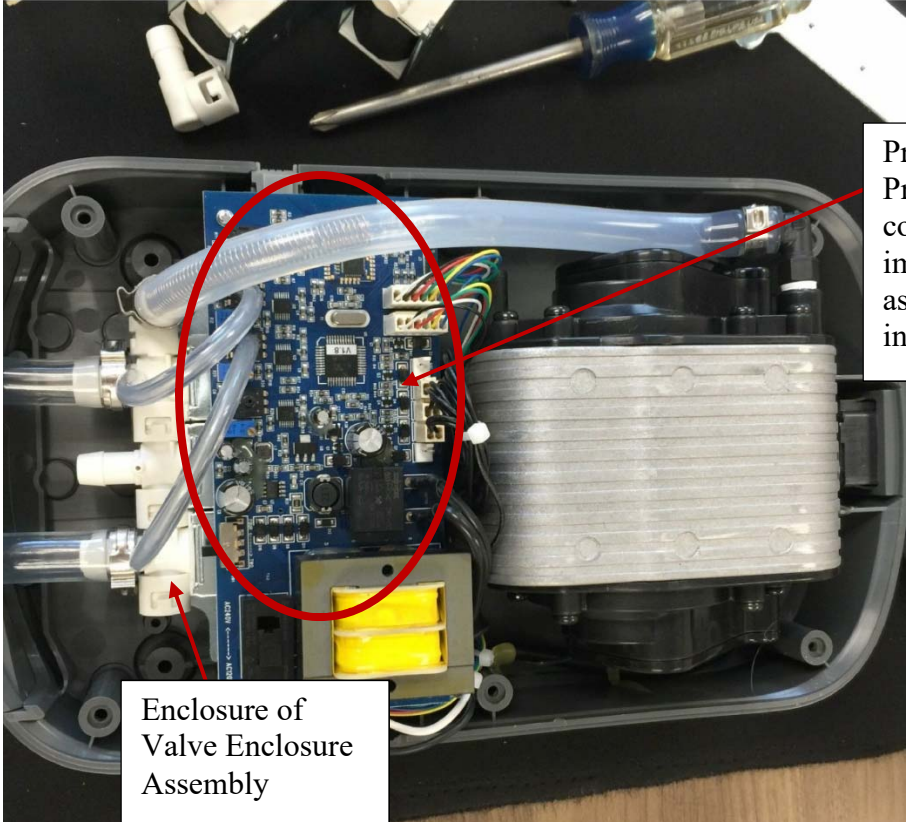
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen 3 Koge:</p>  <p>Printed Circuit Board for Processor, which provides commands to the improved valve enclosure assembly during an inflate/deflate cycle</p> <p>Enclosure of Valve Enclosure Assembly</p> <p>(Photograph of Gen 3 Koge)</p> <p>Versions 1.8, 1.9, 1.92, 1.97, and 2.0 of ANM's source code further demonstrate that the Gen 3 Accused Products include a processor for providing commands to the improved valve enclosure assembly during an inflate/deflate cycle.</p> |

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

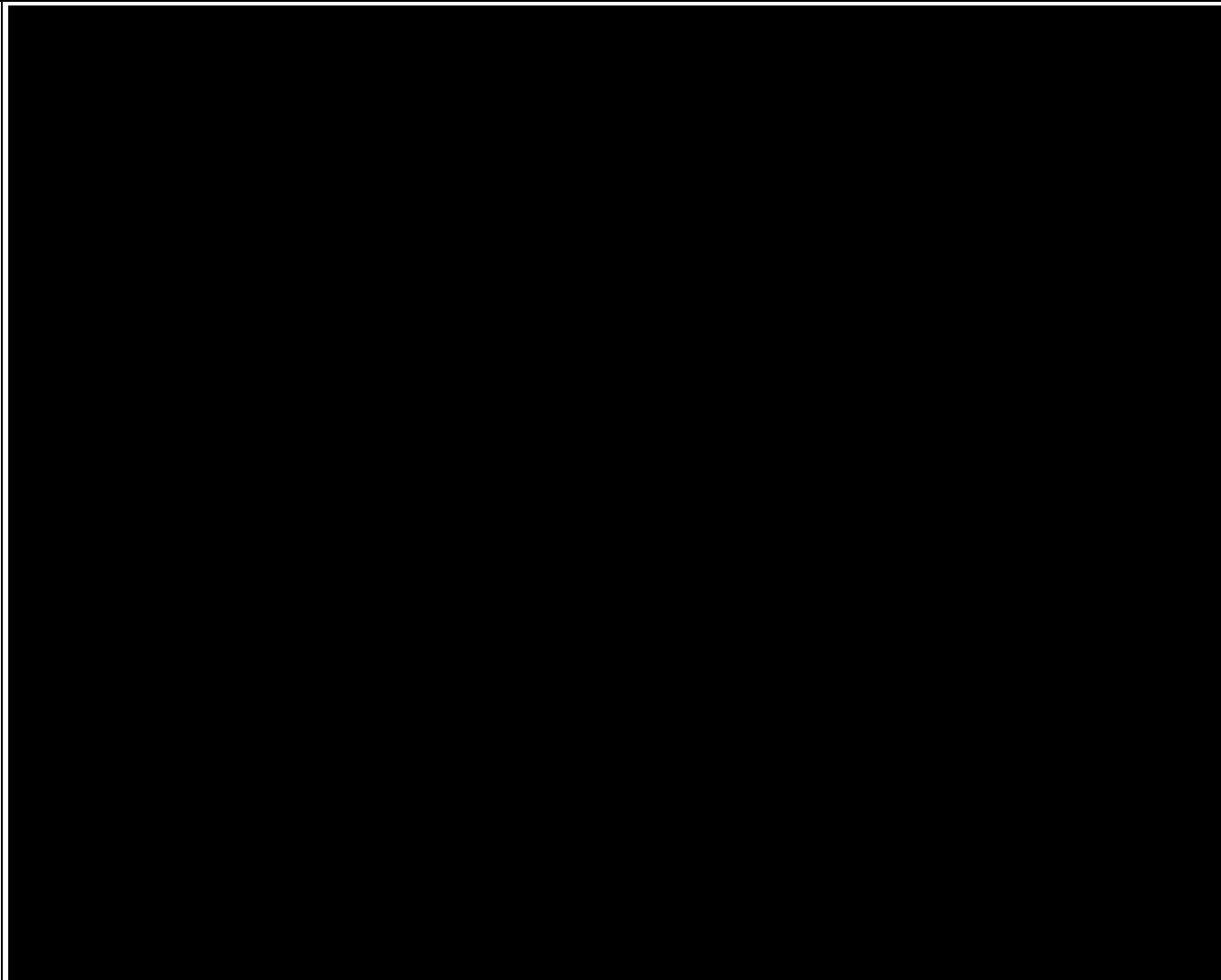
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| |  The content of this table is redacted with a solid black fill. |

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

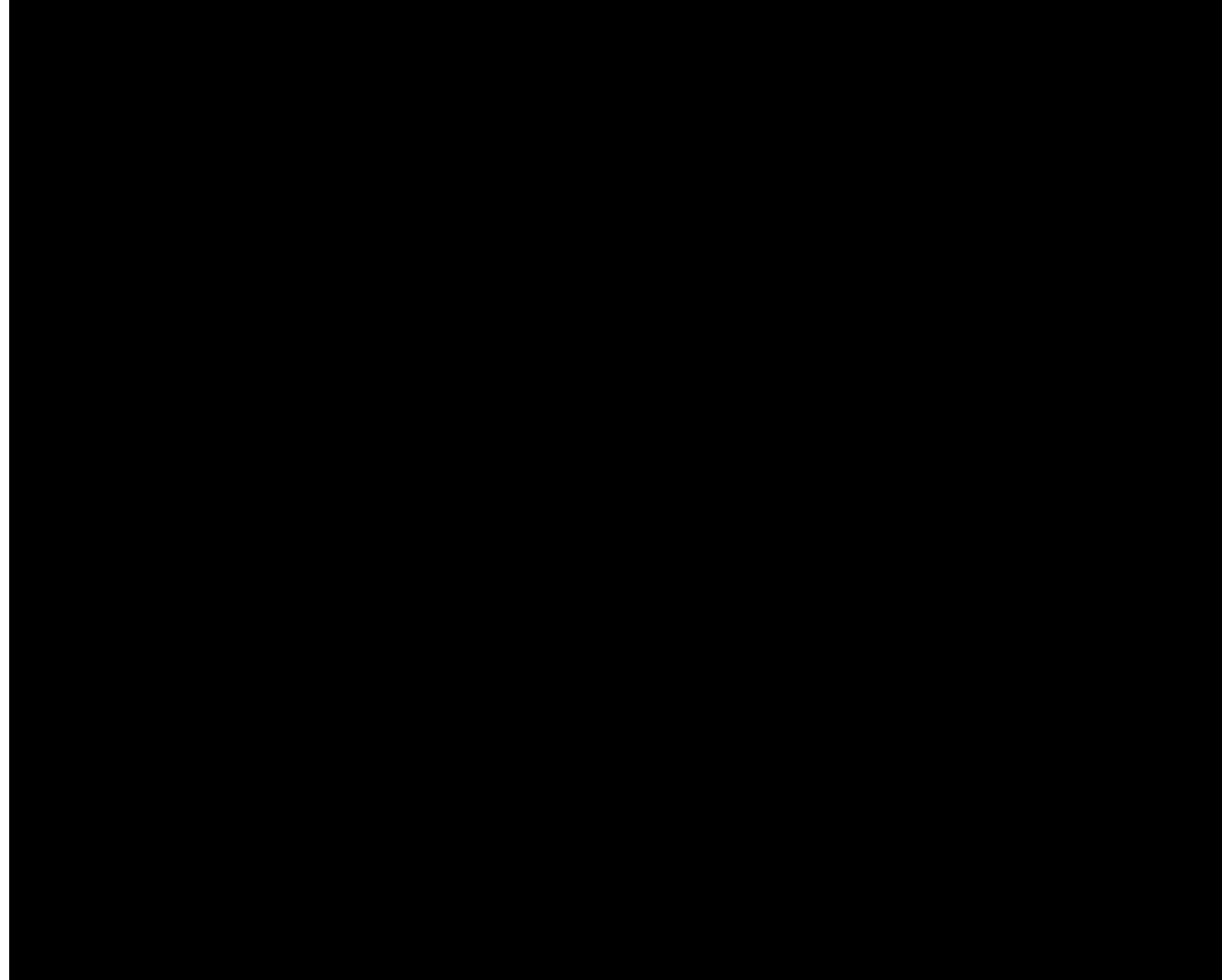
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|----------------------|---|
| |  A large black rectangular redaction covers the entire content area of the table, obscuring all text and data. |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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EXHIBIT A1 - U.S. PATENT NO. 5,904,172 VERSUS AMERICAN NATIONAL MANUFACTURING ACCUSED PRODUCTS

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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EXHIBIT A1 - U.S. PATENT NO. 5,904,172 VERSUS AMERICAN NATIONAL MANUFACTURING ACCUSED PRODUCTS

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <div data-bbox="684 337 1990 571" style="background-color: black; width: 100%; height: 144px; margin-bottom: 10px;"></div> <p data-bbox="684 613 1990 863">This limitation may further implicate other electronics, software, firmware, and/or source code of the Accused Products. Additional Source Code for the Accused Products may further show how this claim limitation is met. To resolve a dispute regarding Plaintiff’s Notice of Inspection for Source Code, the parties have agreed that Plaintiff shall be allowed to inspect remaining Source Code for the Accused Products on mutually agreeable date(s), after which Plaintiff shall supplement its infringement contentions, pursuant to an agreed-upon timeline and without opposition, using the information learned during the inspection.</p> <p data-bbox="684 922 1990 1026">Even under Defendants’ construction from the ITC proceeding, where a “valve enclosure assembly” means “an enclosure and a rear cover defining an internal, pressurized air chamber enclosing a valve,” ANM’s Gen 3 or Gen X air controllers meet this claim limitation.</p> <p data-bbox="684 1084 1990 1156">As seen in the photographs below, the enclosure of the Gen 3 Arco’s valve enclosure assembly is comprised of an enclosure and a rear cover.</p> |

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

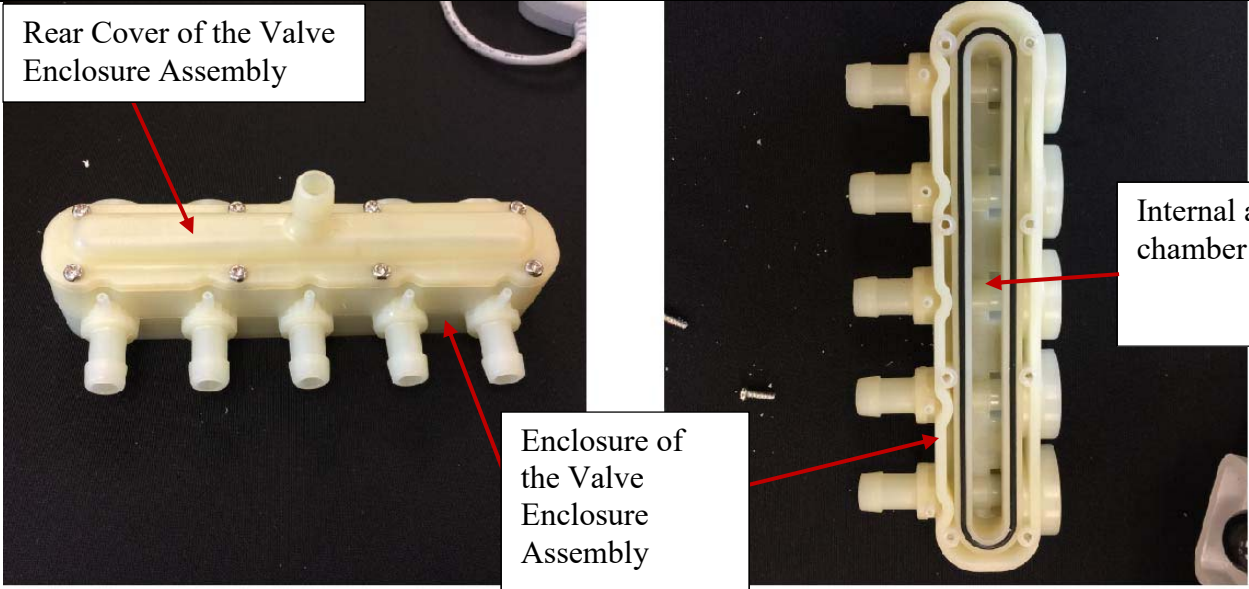
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="680 349 1039 430">Rear Cover of the Valve Enclosure Assembly</p> <p data-bbox="1176 747 1417 917">Enclosure of the Valve Enclosure Assembly</p> <p data-bbox="1785 519 1974 673">Internal air chamber</p> <p data-bbox="892 933 1039 966">Enclosure</p> <p data-bbox="1375 933 1921 966">Enclosure with Rear Cover Removed</p> <p data-bbox="680 1031 1081 1063">(Photograph of the Gen 3 Arco)</p> <p data-bbox="680 1120 1942 1185">Furthermore, as seen in the photograph below showing a side perspective view of the Gen 3 Arco's enclosure, the Gen 3 Arco the internal chamber is shown enclosing a valve.</p> |

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

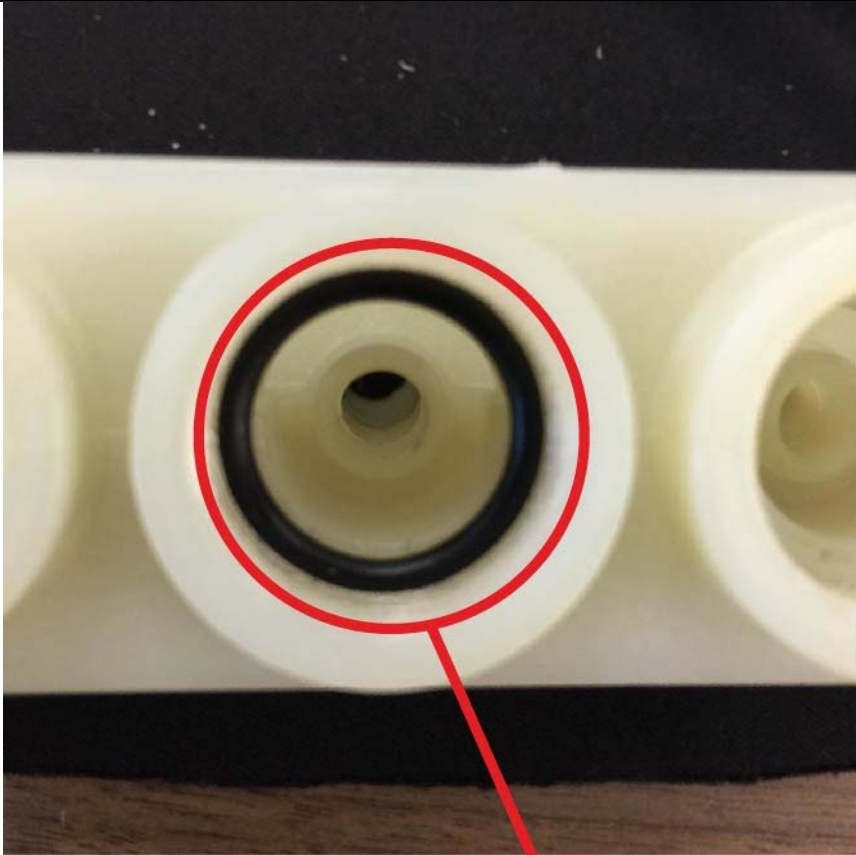
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="829 1289 1656 1360">Perspective view of the internal chamber enclosing a valve</p> <p data-bbox="680 1370 1041 1409">(Photograph of Gen 3 Arco)</p> |

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

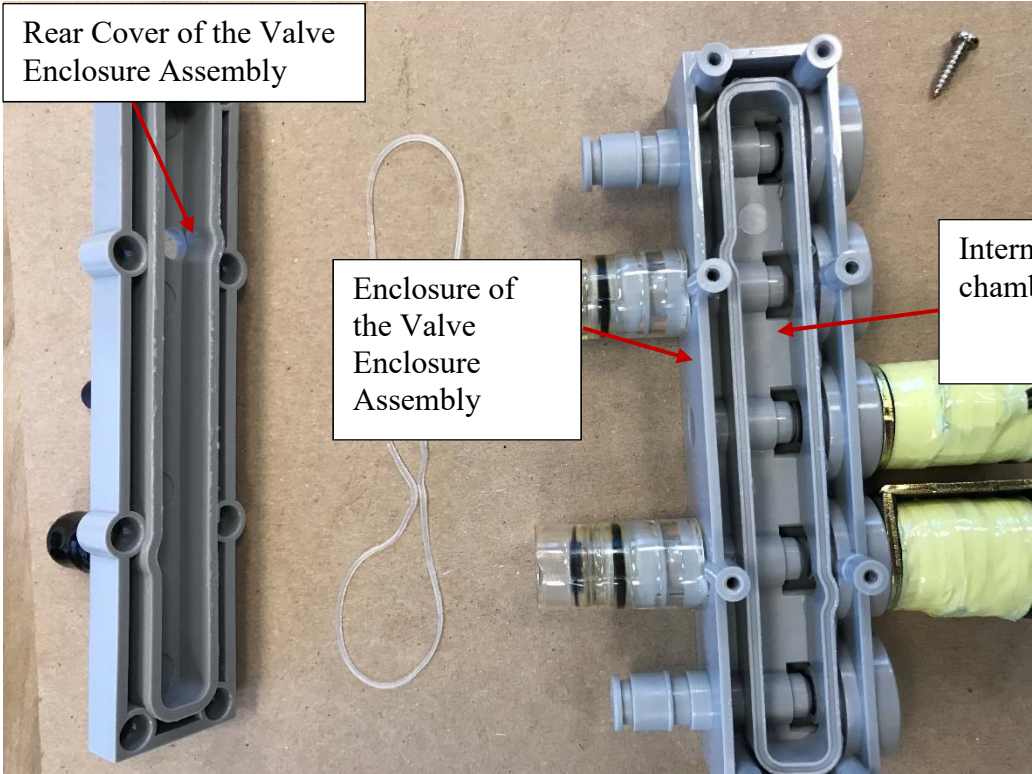
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>As seen in the photographs below, the enclosure of the Gen X's valve enclosure assembly is comprised of an enclosure and a rear cover.</p>  <p>(Photograph of the Gen 3 Arco)</p> <p>Furthermore, as seen in the photograph below showing a side perspective view of the Gen 3 Arco's enclosure, the Gen 3 Arco the internal chamber is shown enclosing a valve.</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1444 743 1692 951">Internal Chamber Enclosing a Valve</p> <p data-bbox="680 1289 1041 1321">(Photograph of Gen 3 Arco)</p> |

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

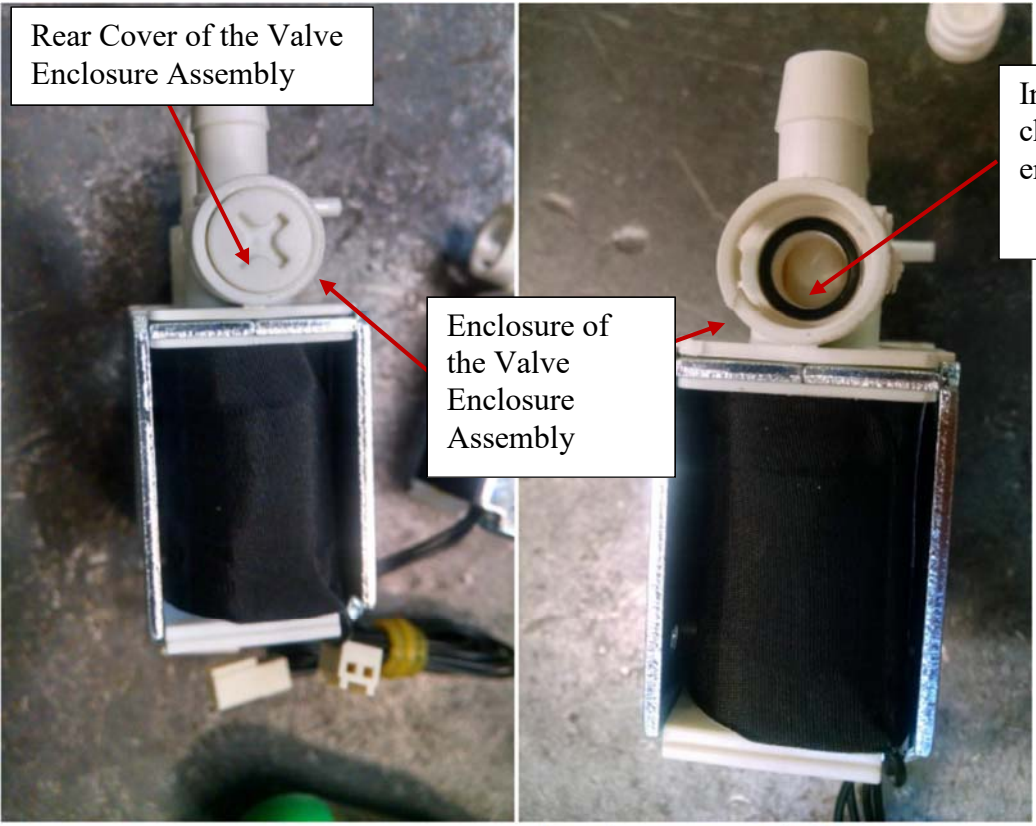
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>As seen in the photographs below, the enclosure of the Gen 3 Koge's valve enclosure assembly is comprised of an enclosure and a rear cover. The valve seal is contained within the enclosure, which shows how the enclosure and rear cover define an internal air chamber enclosing a valve.</p>  <p style="text-align: center;">Enclosure Enclosure with Rear Cover Removed</p> <p>(Photograph of the Gen 3 Koge)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---|--|
| <p>[12.1] an enclosure defining a substantially fluidly sealed air chamber and having at least one air inlet to the air chamber being fluidly coupled to the pump, a plurality of guides and stops being disposed within the enclosure for correctly positioning components within the enclosure;</p> | <p>Under the plain and ordinary meaning of the claim terms in light of the specification, the Gen 3 Arco, Gen X, and Gen 3 Koge Air Controllers include an enclosure defining a substantially fluidly sealed air chamber and having at least one air inlet to the air chamber being fluidly coupled to the pump, a plurality of guides and stops being disposed within the enclosure for correctly positioning components within the enclosure.</p> <p>The Gen 3 Arco air controller includes an enclosure defining a substantially fluidly sealed air chamber that has at least one air inlet to the air chamber, which is fluidly coupled to the pump.</p> |

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

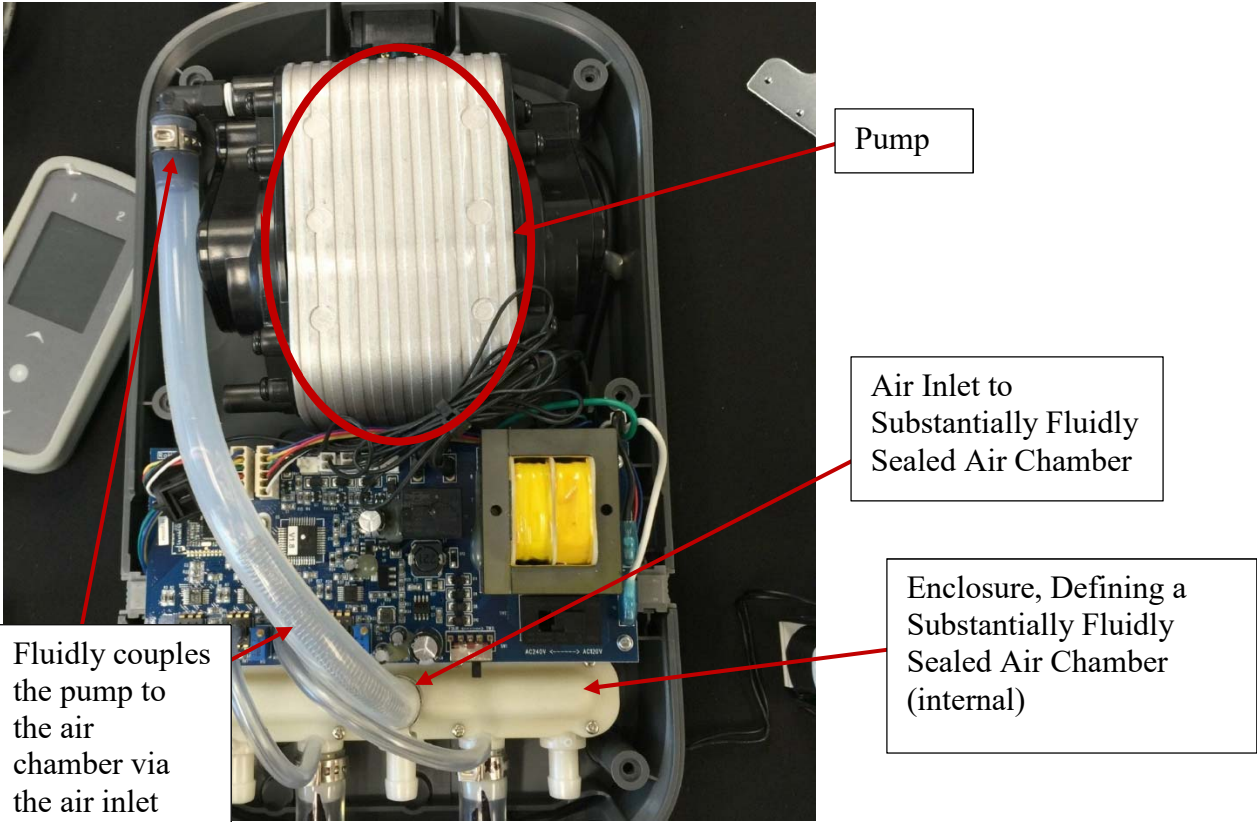
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen 3 Arco:</p>  <p>(Photograph of Gen 3 Arco)</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>As seen in the photograph above, tubing connects the pump to the enclosure and to the air inlet to the air chamber of the enclosure. That is, the air inlet to the air chamber is fluidly coupled to the pump.</p>  <p>(Photograph of Gen 3 Arco)</p> |

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

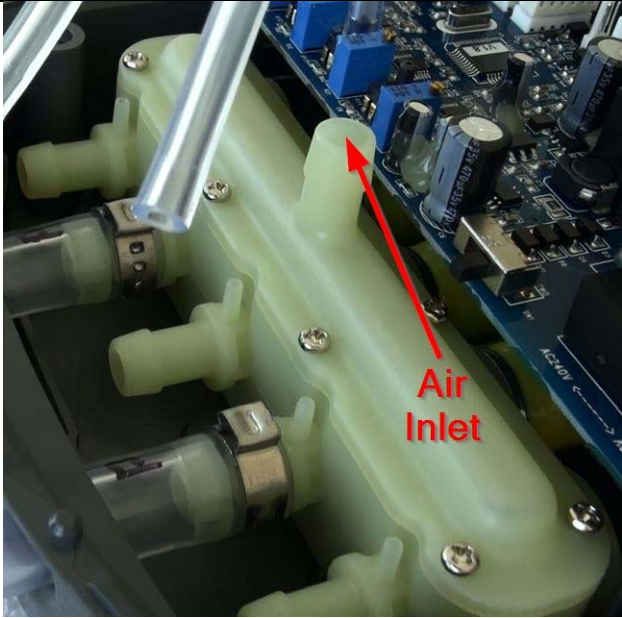
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photograph of Gen 3 Arco)</p> <p>As further seen from the photographs below, the enclosure defines an air chamber. The air chamber includes one or more O-rings, which assist in substantially fluidly sealing the air chamber.</p> |

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

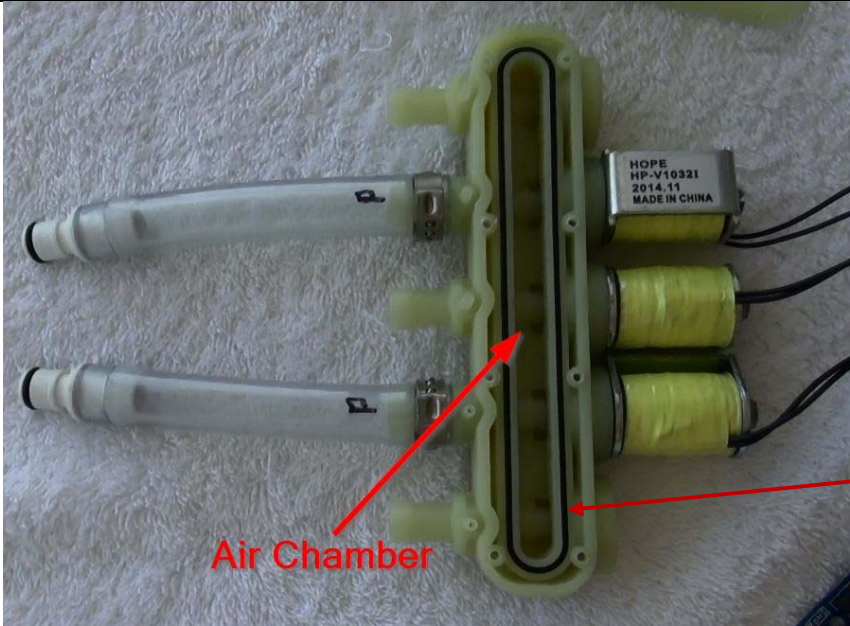
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="680 971 1871 1040">(Photograph of Gen 3 Arco's enclosure (depicted with the rear-cover removed for illustrative purposes).)</p> |

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

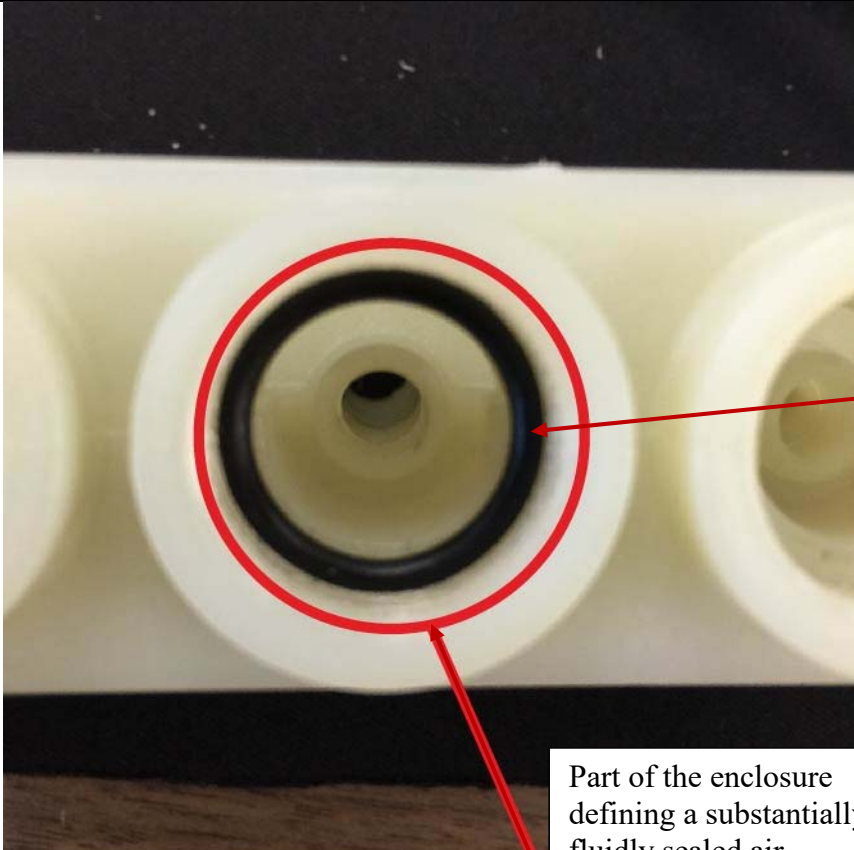
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>O-ring, which assists in substantially fluidly sealing the air chamber</p> <p>Part of the enclosure defining a substantially fluidly sealed air chamber</p> <p>(Photograph of Gen 3 Arco's enclosure (depicted with solenoids removed).)</p> |

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

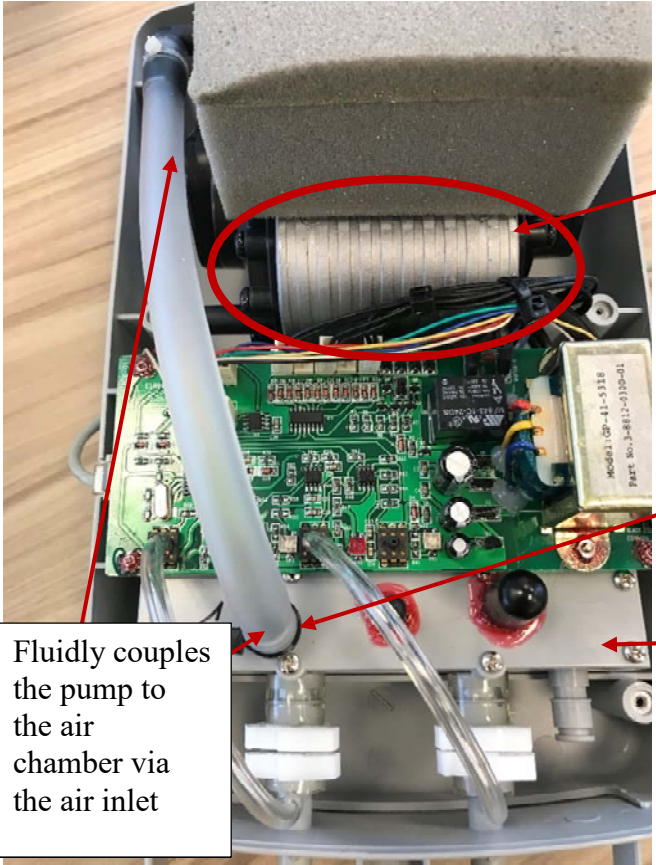
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>The Accused Products having a Gen X air controller include an enclosure defining a substantially fluidly sealed air chamber that has at least one air inlet to the air chamber, which is fluidly coupled to the pump.</p> <p>Gen X:</p>  <p>(Photograph of Gen X)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <p>As seen in the photograph above, tubing connects the pump to the enclosure and to the air inlet to the air chamber of the enclosure. That is, the air inlet to the air chamber is fluidly coupled to the pump.</p> <div data-bbox="678 464 1251 1224" data-label="Image"> <p>The photograph shows a close-up of a mechanical assembly. A clear plastic tube is connected to a pump mechanism on the left. This tube leads to a grey plastic enclosure. A red arrow points from a text box to a circular air inlet on the top surface of the enclosure. In the background, a green printed circuit board (PCB) with various electronic components is visible.</p> </div> <div data-bbox="1419 500 1780 691" data-label="Text"> <p>Air Inlet to Substantially Fluidly Sealed Air Chamber of the Enclosure</p> </div> <p>(Photograph of Gen X)</p> |

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

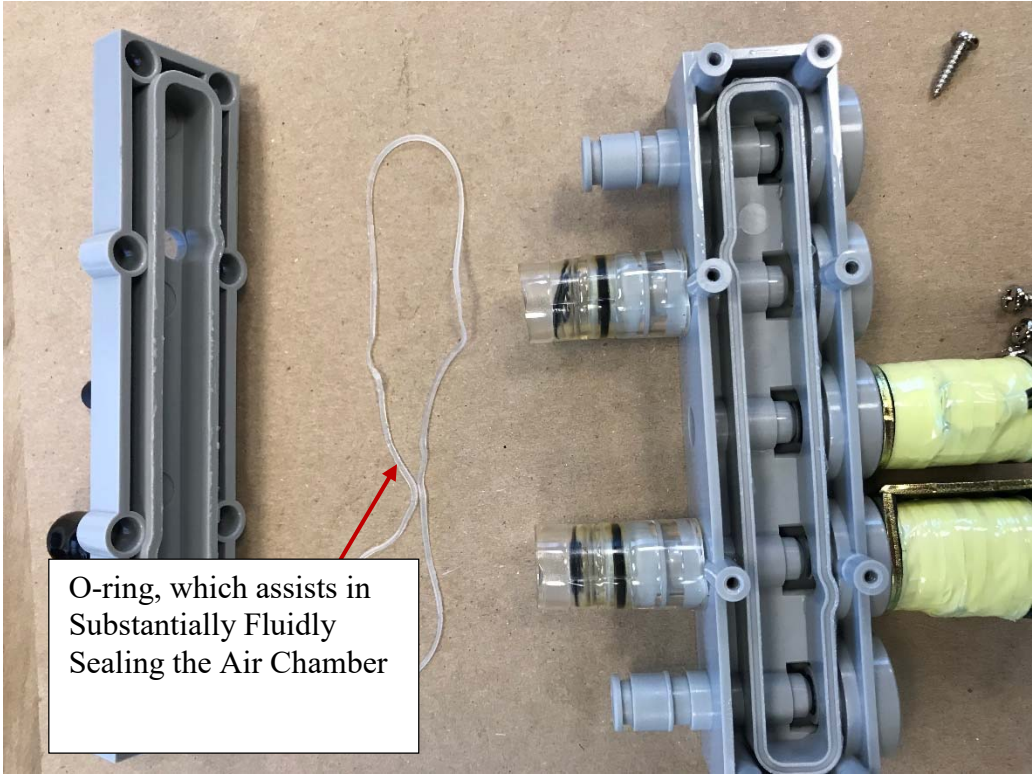
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>As further seen from the photographs below, the enclosure defines an air chamber. The air chamber includes one or more O-rings, which assist in substantially fluidly sealing the air chamber.</p>  <p>O-ring, which assists in Substantially Fluidly Sealing the Air Chamber</p> <p>(Photograph of Gen X's enclosure (depicted with the rear-cover and O-ring disassembled for illustrative purposes).)</p> |

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

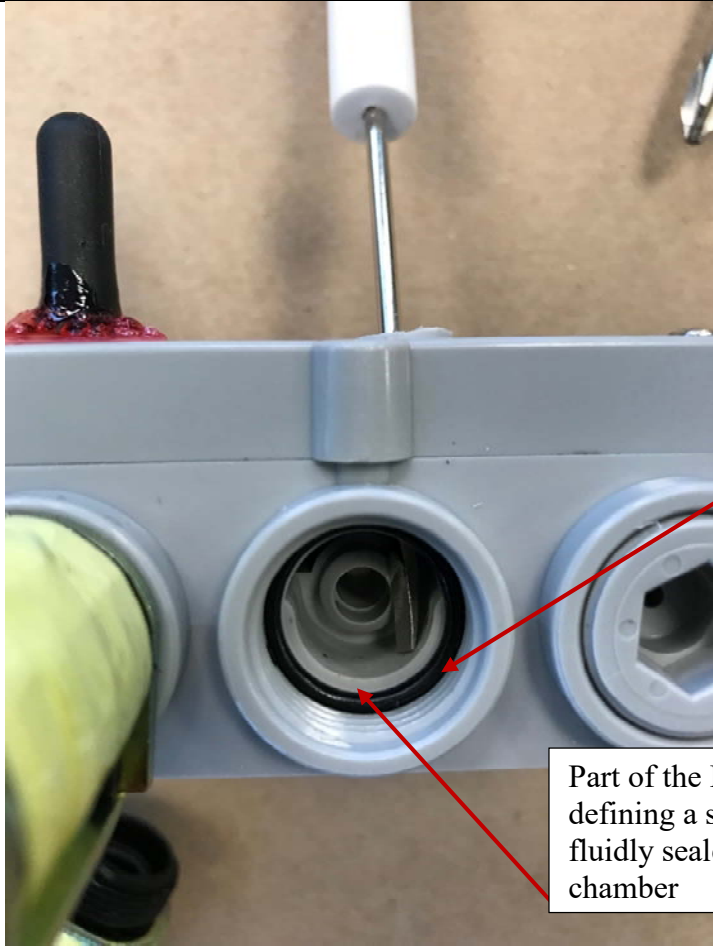
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="1549 638 1919 829">O-ring, which assists in substantially fluidly sealing the air chamber</p> <p data-bbox="1226 1081 1593 1243">Part of the Enclosure defining a substantially fluidly sealed air chamber</p> <p data-bbox="680 1328 1587 1365">(Photograph of Gen X's enclosure (depicted with solenoids removed).)</p> |

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

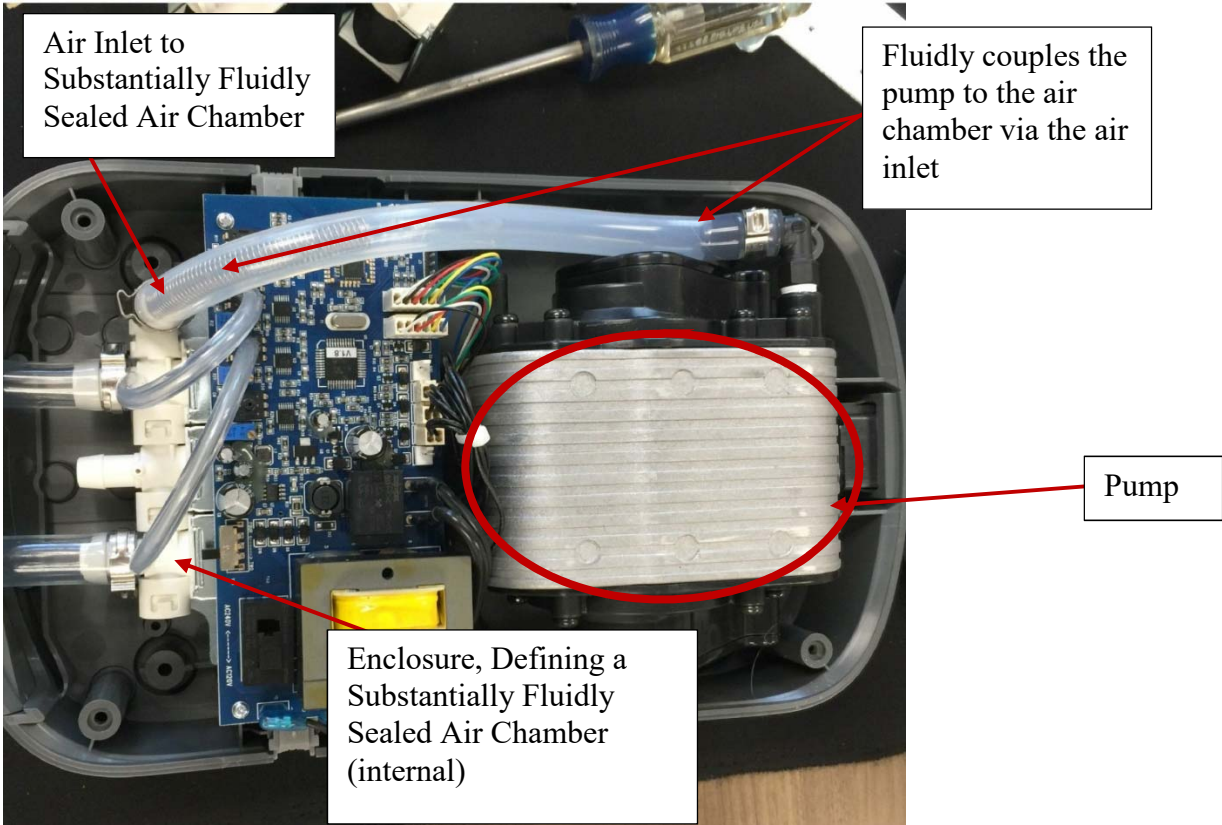
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The Accused Products having a Gen 3 Koge air controller include an enclosure defining a substantially fluidly sealed air chamber that has at least one air inlet to the air chamber, which is fluidly coupled to the pump.</p> <p>Gen 3 Koge:</p>  <p>(Photograph of Gen 3 Koge)</p> |

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

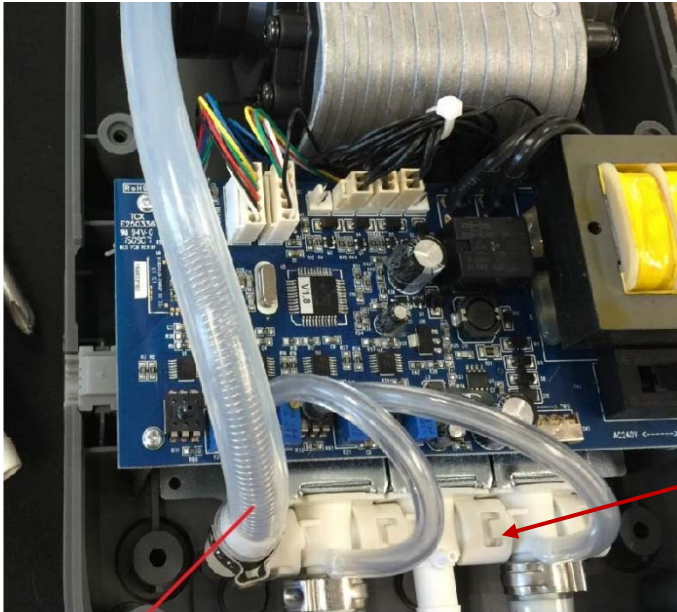
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>As seen in the photograph above, tubing connects the pump to the enclosure and to the air inlet to the air chamber of the enclosure. That is, the air inlet to the air chamber is fluidly coupled to the pump.</p>  <p data-bbox="1388 760 1757 954">Enclosure, which defines a Substantially Fluidly Sealed Air Chamber</p> <p data-bbox="688 1084 1073 1230">Inlet to substantially fluidly sealed enclosure</p> <p data-bbox="680 1247 1050 1284">(Photograph of Gen 3 Koge)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <p>As further seen from the photographs below, the enclosure defines an air chamber. The air chamber includes one or more interlocking connectors, which assist in substantially fluidly sealing the air chamber.</p> <div data-bbox="680 500 1480 1299"> <p>The photograph shows a close-up of a device's internal components. Three solenoid valves are mounted on a white plastic manifold. The valves are labeled 'KSV4WD-24A-3A', 'DC 24V', and 'KOGÉ 160108C'. The manifold is connected to clear plastic tubing. Two red arrows point from text boxes to the interlocking connectors on the manifold. One arrow points to the top of the manifold, and the other points to the side of the manifold. The background is a dark, textured enclosure.</p> </div> <div data-bbox="1533 747 1879 844"> <p>Interlocking connectors</p> </div> <div data-bbox="1554 917 1921 1112"> <p>Enclosure defining Substantially Fluidly Sealing the Air Chamber</p> </div> <p>(Photograph of Gen 3 Koge)</p> |

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

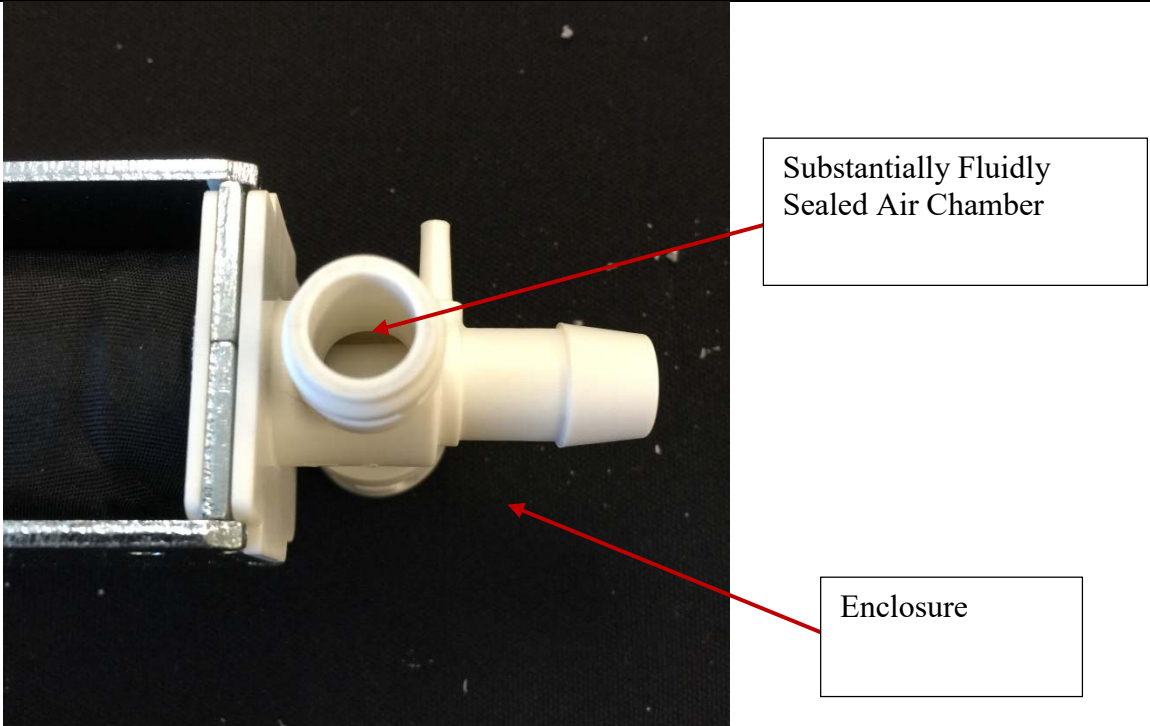
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>(Photograph of Gen 3 Koge's enclosure (depicted detached from other enclosure components).)</p> <p>When the Gen 3 and Gen X air controllers inflate the one or more air bladders, the pump, tubing that connects the pump to the air inlet, air chamber, and tubing connecting the air chamber to the one or more air bladders creates a substantially fluidly sealed environment substantially fluidly sealing the air chamber. That is, the enclosure contains several fluid tight seals and the tubing connecting the air bladders and pump to the enclosure creates a fluidly sealed environment such that the air chamber defined by the enclosure is substantially fluidly sealed. To the extent this limitation is not literally present the limitation is met under the doctrine of equivalents because the substantially fluidly sealed</p> |

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

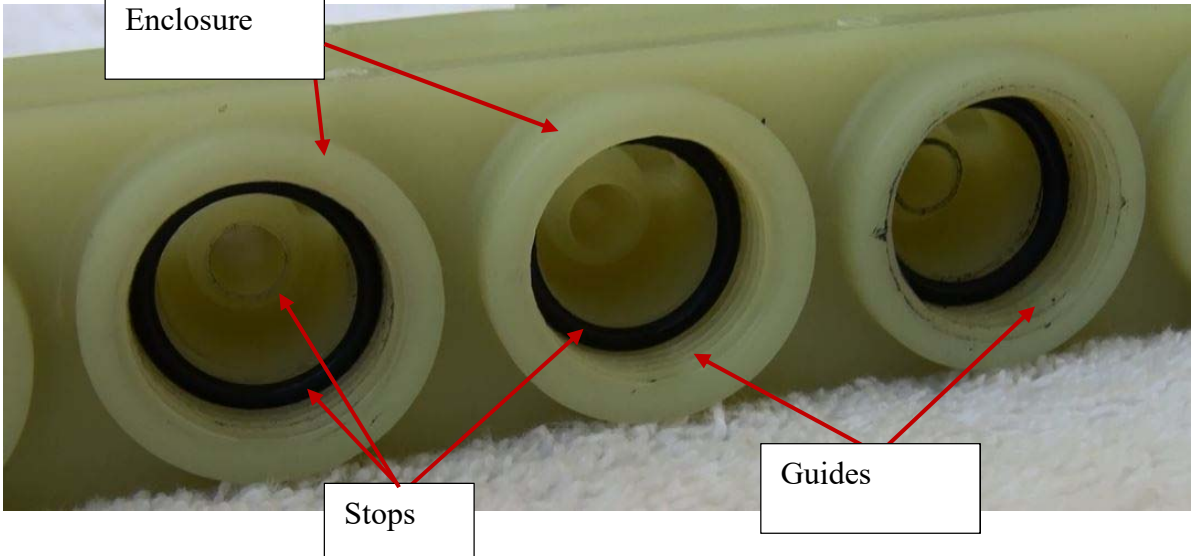
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>environment performs substantially the same function as a substantially sealed air chamber in substantially the same way and to obtain the substantially same result. Accordingly, the air chamber defined by the enclosure meets the substantially fluidly sealed limitation.</p> <p>The Accused Products having a Gen 3 Arco air controller include a plurality of guides and stops disposed within the enclosure for correctly positioning components within the enclosure. Specifically, the enclosure of the Gen 3 Arco includes threaded guides or guide walls within the enclosure for correctly positioning solenoid components within the enclosure. The enclosure of the Gen 3 Arco further includes a raised valve seat, ledge, and/or O-ring to stop the component at the correct position within the enclosure.</p>  <p>(Photograph of Gen 3 Arco)</p> |

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

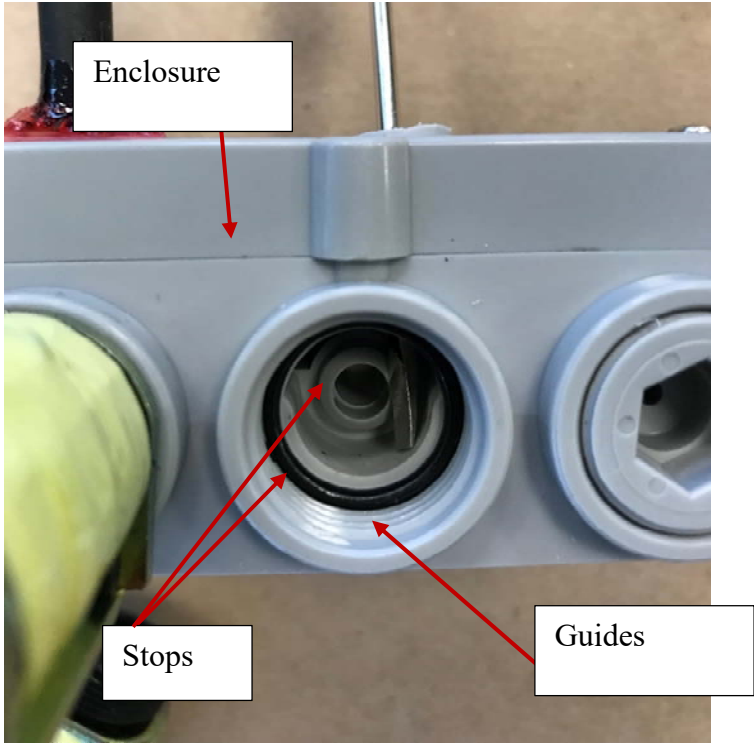
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>The Accused Products having a Gen X air controller include a plurality of guides and stops disposed within the enclosure for correctly positioning solenoid components within the enclosure and a raised valve seat, ledge, and/or O-ring to stop the solenoid component(s) at the correct position within the enclosure.</p>  <p>(Photograph of Gen X)</p> |

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

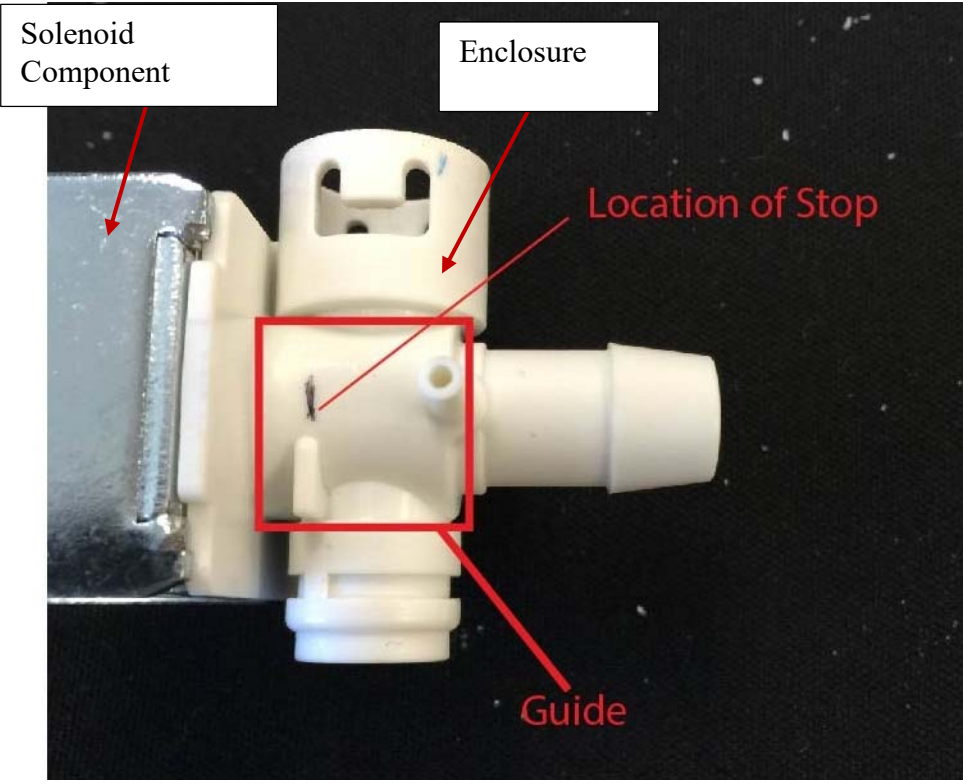
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>The Accused Products having a Gen 3 Koge air controller include a plurality of guides and stops disposed within the enclosure for correctly positioning components within the enclosure. Specifically, the enclosure of the Gen 3 Koge includes guiding walls within the enclosure for correctly positioning components within the enclosure. The solenoid component extends into the enclosure until it intersects with a stop, i.e., a raised fitting, valve seat, or ledge, etc. within the enclosure to create a seal.</p>  <p>(Photograph of Gen 3 Koge)</p> |

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

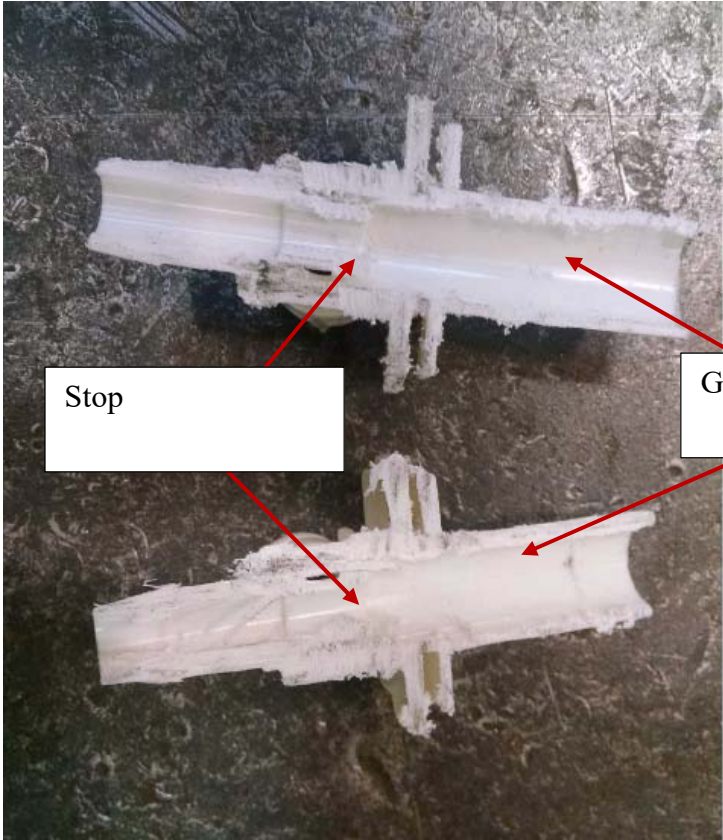
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>The guiding wall guide and raised ledge stop can be further seen in the photograph below of a cross section of the enclosure of the enclosure assembly.</p>  <p>The photograph shows two cross-sectional views of a white plastic enclosure assembly. Red arrows point from two white boxes labeled 'Stop' and 'Guide' to specific features on the inner surface of the enclosure. The 'Stop' feature is a raised ledge, and the 'Guide' feature is a recessed channel.</p> <p>Even under Defendants’ constructions from the ITC proceeding, where a “guide” would be construed as “structures formed on the inner surface of the bottom of the enclosure to laterally position internal components,” and a “stop” would be construed as “structures formed on the inner surface of the</p> |

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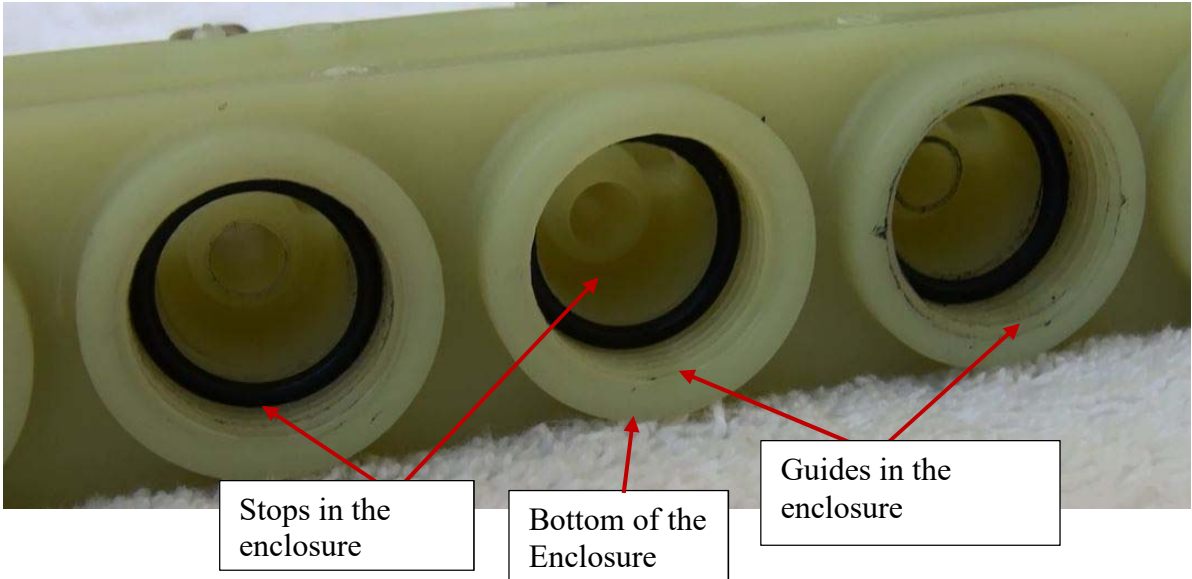
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>bottom of the enclosure to limit the travel of internal components,” ANM’s Gen 3 or Gen X air controllers meet this claim limitation.</p> <p>The enclosure of the Gen 3 Arco includes threaded guides to laterally position internal solenoid components. The enclosure of the Gen 3 Arco further includes a raised valve seat, ledge, and/or O-ring to limit travel of solenoid components. The enclosure further includes a plastic structure formed on the inner surface of the bottom of the enclosure to limit travel of internal components.</p>  <p>(Photograph of Gen 3 Arco)</p> <p>The enclosure of the Gen X includes threaded guides to laterally position internal solenoid components. The enclosure of the Gen X further includes a raised valve seat, ledge, and/or O-ring to</p> |

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

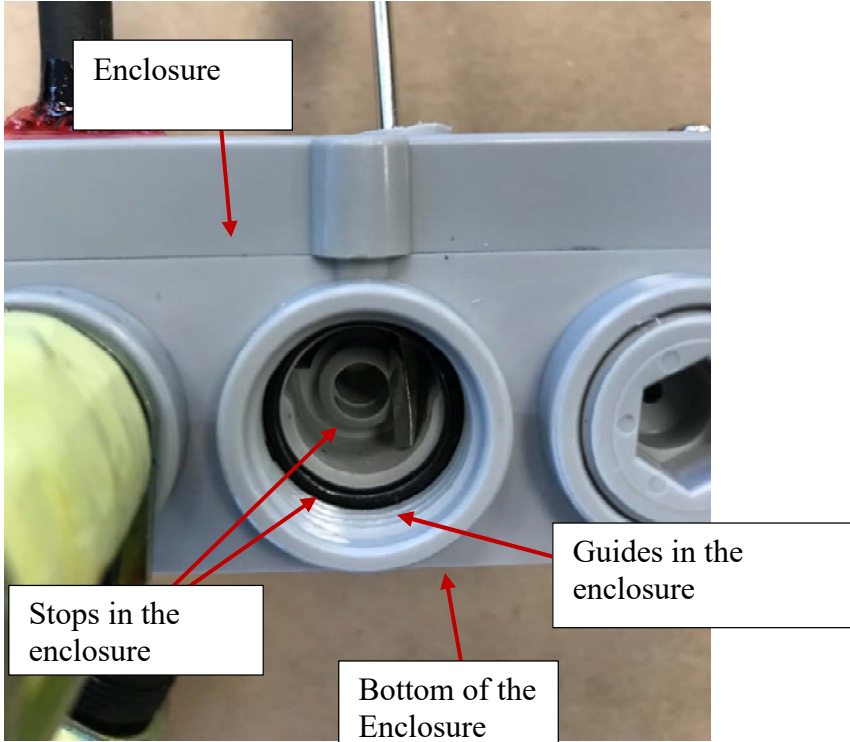
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>limit travel of solenoid components. The enclosure further includes a plastic structure formed on the inner surface of the bottom of the enclosure to limit travel of internal components.</p>  <p>(Photograph of Gen X)</p> <p>The enclosure of the Gen 3 Koge includes guiding walls to laterally position solenoid components. The solenoid component extends into the enclosure until it is stopped by a stop configured to limit travel of the solenoid.</p> |

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

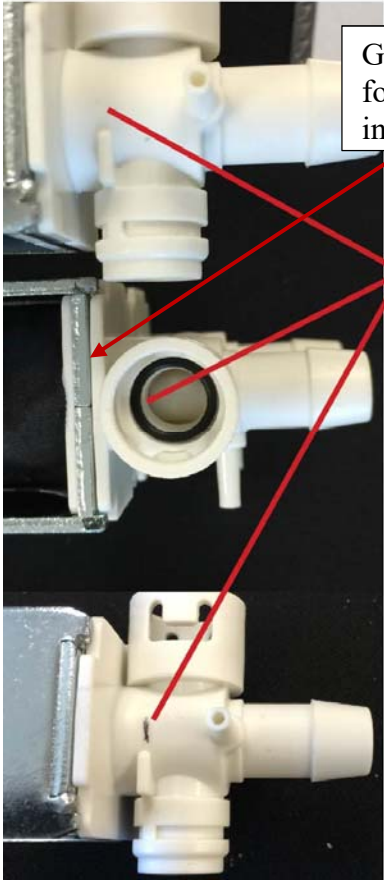
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1031 378 1360 505">Guiding wall structure formed on the bottom inner surface</p> <p data-bbox="1087 610 1304 643">Location of stop</p> <p data-bbox="680 1284 1885 1352">The guiding wall guide and stop can be further seen on an inner surface of the enclosure in the photograph below, a cross section of the enclosure of the enclosure assembly.</p> |

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

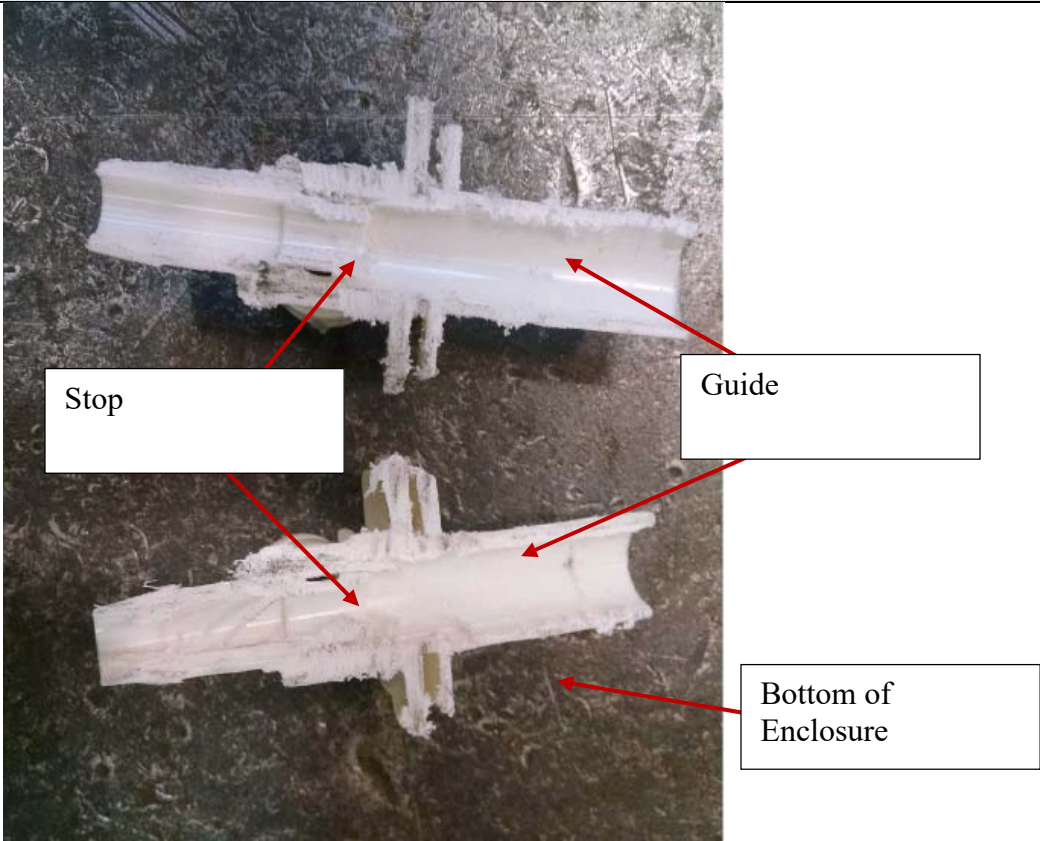
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---|---|
| |  <p>The image shows two views of a white plastic component. Red arrows point from labels to specific features: 'Stop' points to a raised edge on the left side of the top view; 'Guide' points to a vertical slot on the right side of the top view; and 'Bottom of Enclosure' points to the lower edge of the bottom view.</p> |
| <p>[12.2] at least one valve operably coupled to the enclosure being in selective fluid communication with the air chamber and being in fluid communication with the at least one air bladder for selectively fluidly</p> | <p>Under the plain and ordinary meaning of the claim terms in light of the specification, the Gen 3 Arco, Gen X, and Gen 3 Koge Air Controllers include at least one valve operably coupled to the enclosure being in selective fluid communication with the air chamber and being in fluid communication with the at least one air bladder for selectively fluidly coupling the air chamber to at least one air bladder.</p> |

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

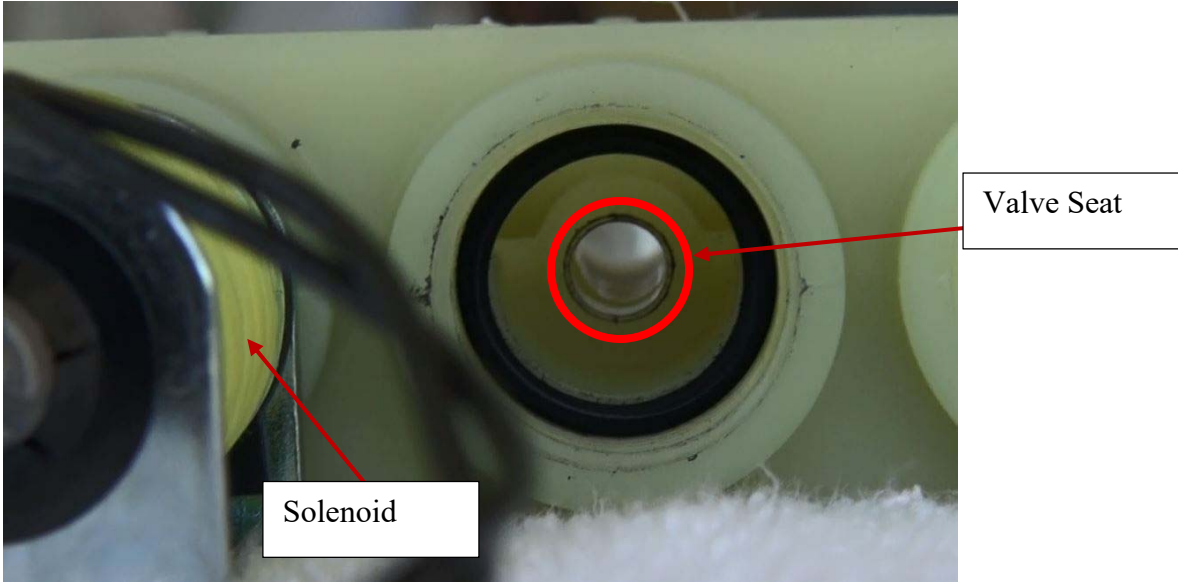
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|--|--|
| <p>coupling the air chamber to at least one air bladder; and</p> | <p>The Gen 3 Arco air controllers include at least one valve operably coupled to the enclosure and capable of being in selective fluid communication with the air chamber. Specifically, the valve enclosure assembly of the Gen 3 Arco includes a plurality of valves operably coupled to the enclosure. The valves are capable of being in fluid communication with the at least one air bladder and are selectable or in selective fluid communication with the air chamber. The valves are configured to be selectable/are capable of the selective fluid coupling of the air chamber to at least one air bladder. The valve is created by a valve seat and the plunger of a solenoid. The valve seat is part of the mold that creates the enclosure of the valve enclosure assembly and is therefore operably coupled to the enclosure. The plunger of the solenoid is inserted into the enclosure such that the plunger is capable of contacting the valve seat to close the valve, and is thus also operably coupled to the enclosure.</p>  <p>(Photograph of Gen 3 Arco's valve enclosure assembly with a solenoid removed)</p> |

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

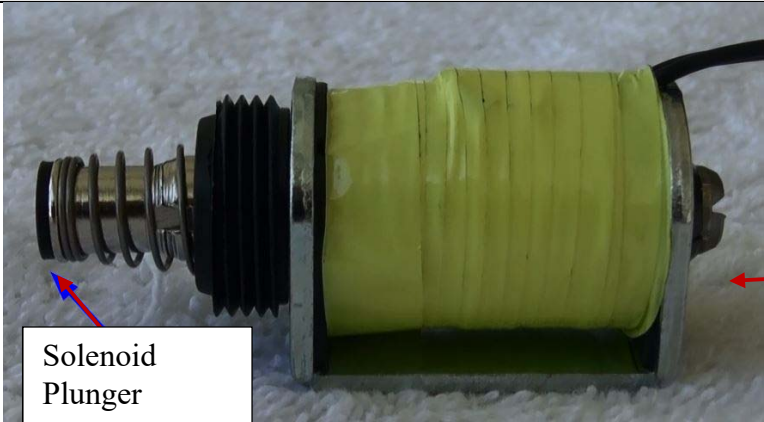
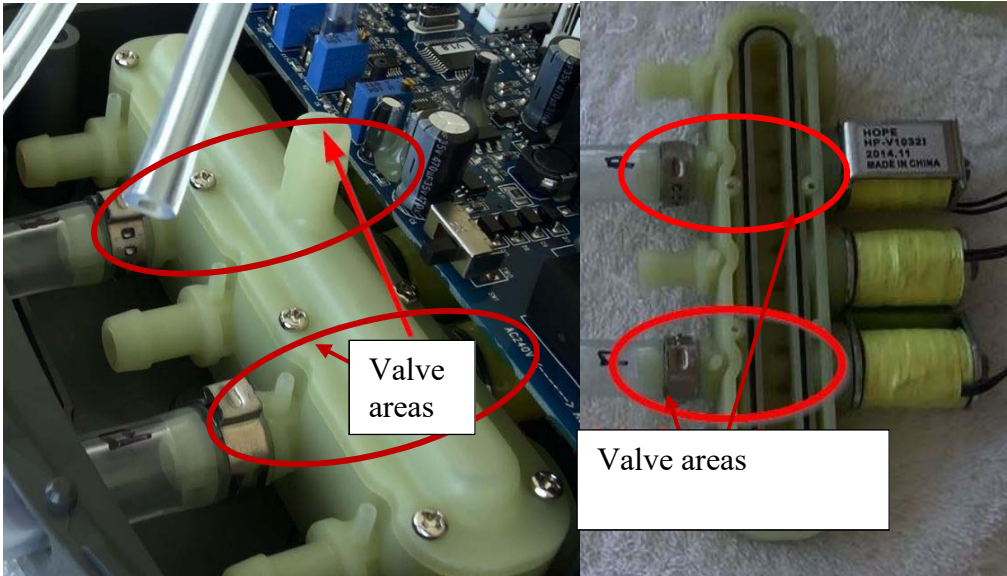
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="680 763 1081 803">There are a plurality of valves:</p>  <p data-bbox="680 1388 1060 1421">(Photographs of Gen 3 Arco)</p> |

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

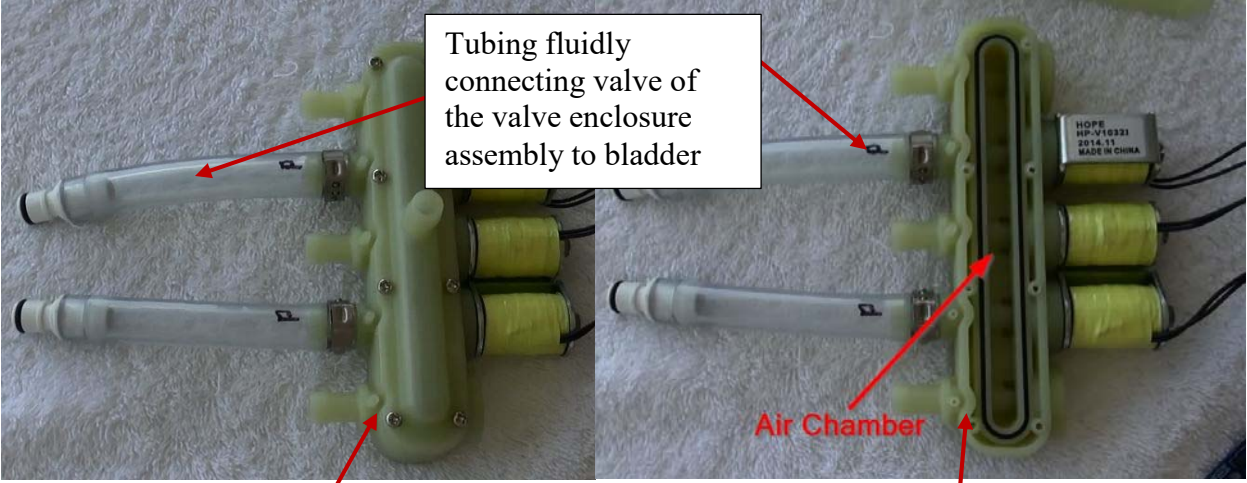
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The valve is fluidly coupled to the bladder of an air inflatable mattress. For example, as seen in the photographs below, tubing fluidly couples the enclosure of the valve enclosure assembly to one or more bladders. Accordingly, the valve is capable of being in fluid communication with the at least one air bladder.</p>  <p style="text-align: center;">Tubing fluidly connecting valve of the valve enclosure assembly to bladder</p> <p style="text-align: right;">Air Chamber</p> <div style="display: flex; justify-content: space-around;"> <div data-bbox="682 990 1260 1063" style="border: 1px solid black; padding: 5px;"> <p>Enclosure of Valve Enclosure Assembly (Photographs of Gen 3 Arco)</p> </div> <div data-bbox="1501 990 1890 1128" style="border: 1px solid black; padding: 5px;"> <p>Enclosure of Valve Enclosure Assembly (cover removed)</p> </div> </div> |

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

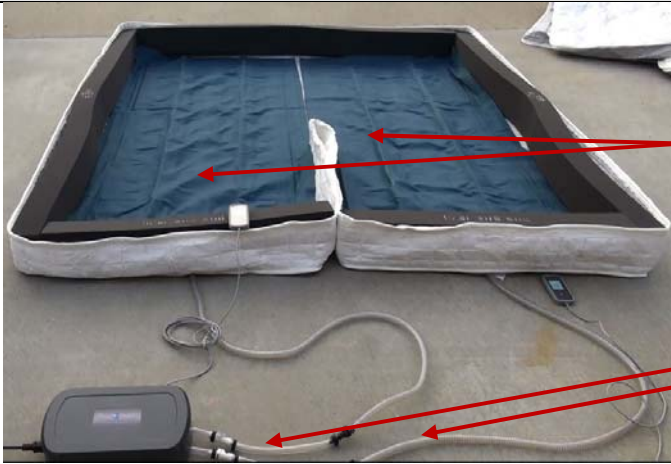
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1381 415 1652 526">Bladder of an air inflatable mattress</p> <p data-bbox="1402 597 1692 764">Tubing fluidly connecting valve enclosure assembly to bladder</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="693 397 976 560">Tubing fluidly connecting valve enclosure assembly to bladder</p> <p data-bbox="1627 381 1942 560">Bladders of Air Inflatable Mattress, which are inflatable by compressed air</p> <p data-bbox="1564 755 1879 901">Air Controller containing the Valve Enclosure Assembly</p> <p data-bbox="682 1006 1249 1047">(Photograph of medical air mattress system)</p> <p data-bbox="682 1096 1984 1380">When the valve is open, air (represented by blue arrows) can pass from the substantially fluidly sealed air chamber of the enclosure of the valve enclosure assembly through the valve and tubing fluidly connecting the valve enclosure assembly to the bladder of the air inflatable mattress. Thus, when open, the valve allows for the fluidly coupling of the air chamber to at least one air bladder. However, this fluid coupling is selective or selectable because when the valve is closed, air cannot pass from the air chamber through the valve. Accordingly, the valve is capable of being in selective fluid communication with the air chamber. Thus, when closed, the air chamber and the air bladder are not fluidly coupled.</p> |

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

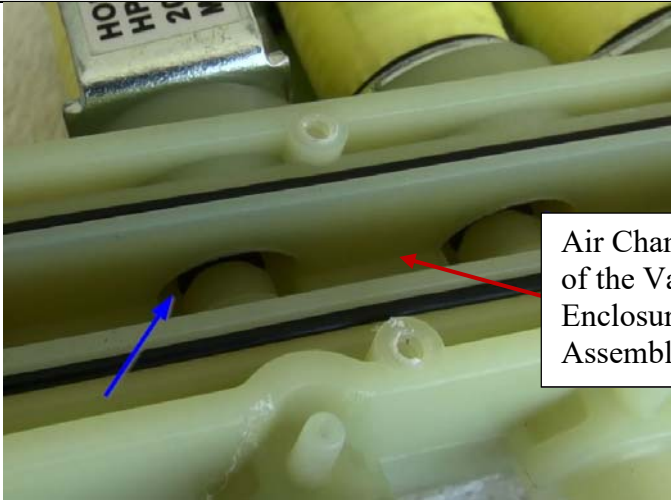
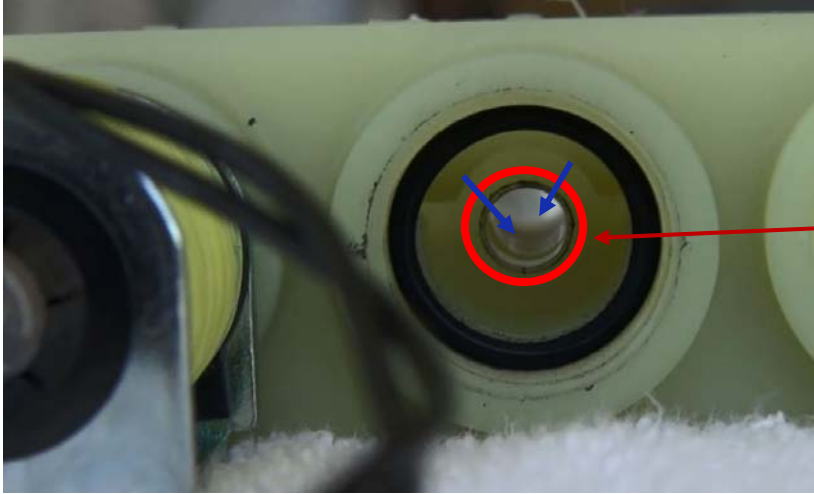
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="1220 548 1444 719">Air Chamber of the Valve Enclosure Assembly</p> <p data-bbox="680 846 1041 878">(Photograph of Gen 3 Arco)</p>  <p data-bbox="1640 1057 1850 1133">Valve Seat</p> <p data-bbox="680 1385 1041 1417">(Photograph of Gen 3 Arco)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The Accused Products having a Gen X air controller include at least one valve operably coupled to the enclosure and capable of being in selective fluid communication with the air chamber. Specifically, the valve enclosure assembly of the Gen X includes a plurality of valves operably coupled to the enclosure. The valves are capable of being in fluid communication with the at least one air bladder and are selectable or in selective fluid communication with the air chamber. The valves are configured to be selectable/are capable of the selective fluid coupling of the air chamber to at least one air bladder. The valve is created by a valve seat and the plunger of a solenoid. The valve seat is part of the mold that creates the enclosure of the valve enclosure assembly and is therefore operably coupled to the enclosure. The plunger of the solenoid is inserted into the enclosure such that the plunger is capable of contacting the valve seat to close the valve, and is thus also operably coupled to the enclosure.</p> |

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

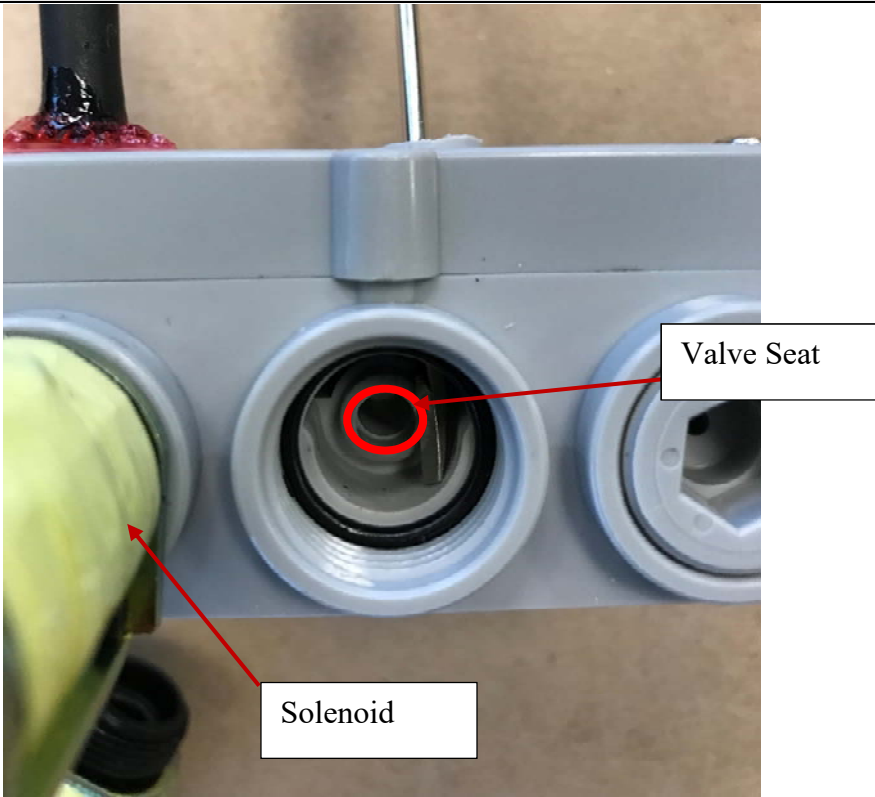
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>(Photograph of Gen X's valve enclosure assembly with a solenoid removed)</p> |

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

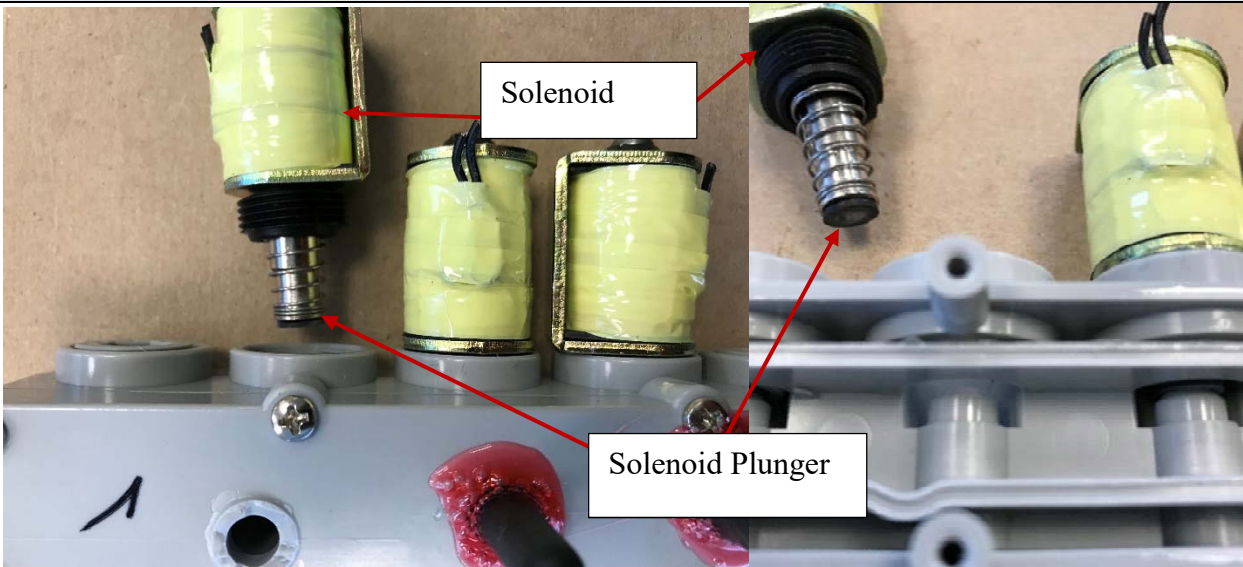
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photographs of Gen X)</p> <p>There are a plurality of valves:</p> |

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

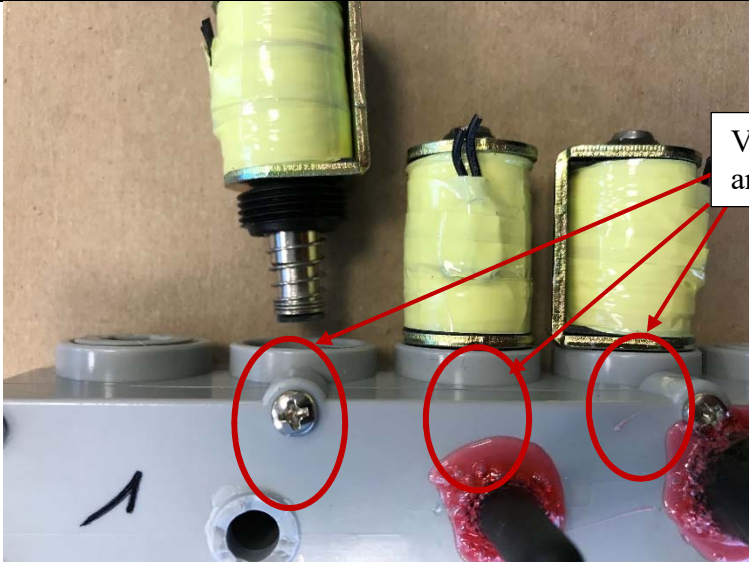
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photographs of Gen X)</p> <p>The valve is fluidly coupled to the bladder of an air inflatable mattress. For example, as seen in the photographs below, tubing fluidly couples the enclosure of the valve enclosure assembly to one or more bladders. Accordingly, the valve is capable of being in fluid communication with the at least one air bladder.</p> |

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

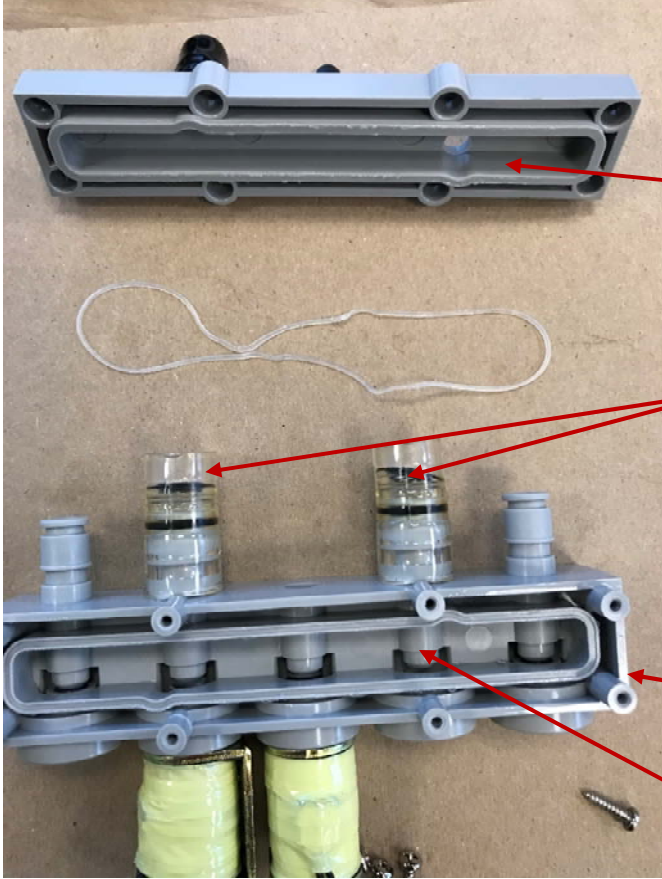
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>(Photographs of Gen X)</p> |

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

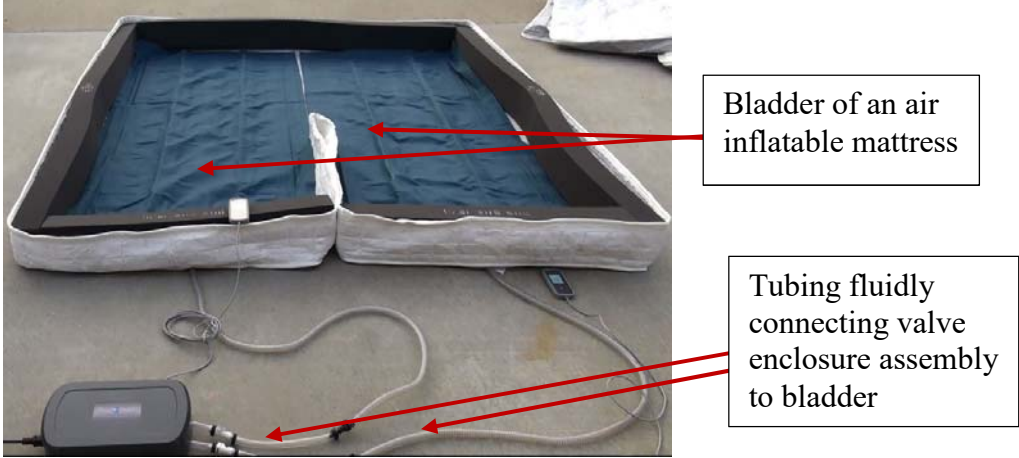
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>(exemplary photo of air mattress system)</p> <p>When the valve is open, air (represented by blue arrows) can pass from the substantially fluidly sealed air chamber of the enclosure of the valve enclosure assembly through the valve and tubing fluidly connecting the valve enclosure assembly to the bladder of the air inflatable mattress. Thus, when open, the valve allows for the fluidly coupling of the air chamber to at least one air bladder. However, this fluid coupling is selective or selectable because when the valve is closed, air cannot pass from the air chamber through the valve. Accordingly, the valve is capable of being in selective fluid communication with the air chamber. Thus, when closed, the air chamber and the air bladder are not fluidly coupled.</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="1381 581 1606 755">Air Chamber of the Valve Enclosure Assembly</p> <p data-bbox="680 1198 976 1230">(Photograph of Gen X)</p> |

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

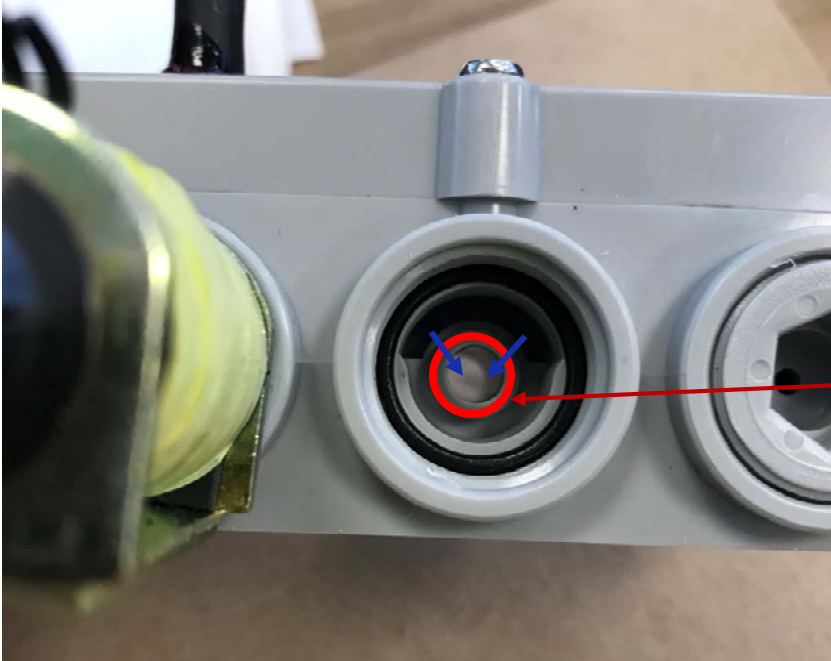
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="682 1015 976 1047">(Photograph of Gen X)</p> <p data-bbox="682 1096 1984 1315">The Accused Products having a Gen 3 Koge air controller include at least one valve operably coupled to the enclosure and capable of being in selective fluid communication with the air chamber. Specifically, the enclosure of the valve enclosure assembly of the Gen 3 Koge includes a plurality of valves operably coupled to the enclosure. The valves are capable of being in fluid communication with the at least one air bladder and in selective or selectable fluid communication with the air chamber.</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The enclosure of the valve enclosure assembly of the Gen 3 Koge includes a plurality of valves fluidly connected to the bladder. The photograph below shows a valve in that is partially contained within the enclosure of the valve enclosure assembly of the Gen 3 by Koge device. That is, when the modular valve enclosure assembly elements are connected, the valve is, at least partially, contained within the substantially fluidly sealed air chamber of the enclosure of the valve enclosure assembly. The valves allow for, are configured to, or are capable of the selective or selectable fluid coupling of the air chamber to at least one air bladder. The valve is created by a valve seat formed from the mold of the enclosure of the valve enclosure assembly and the plunger of a solenoid, which is inserted into the enclosure.</p> |

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

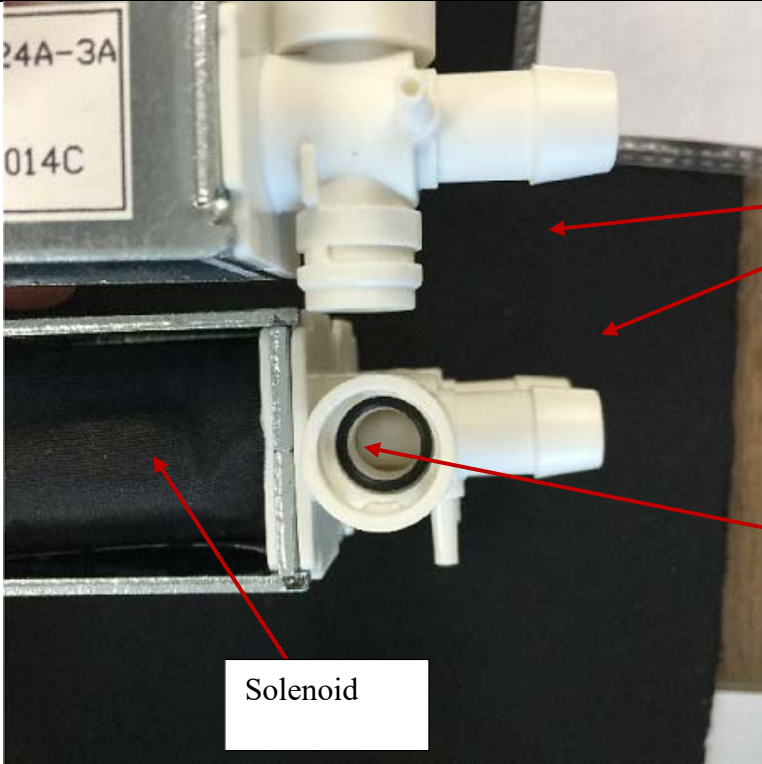
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="688 1112 1045 1144">(Photograph of Gen 3 Koge)</p> |

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

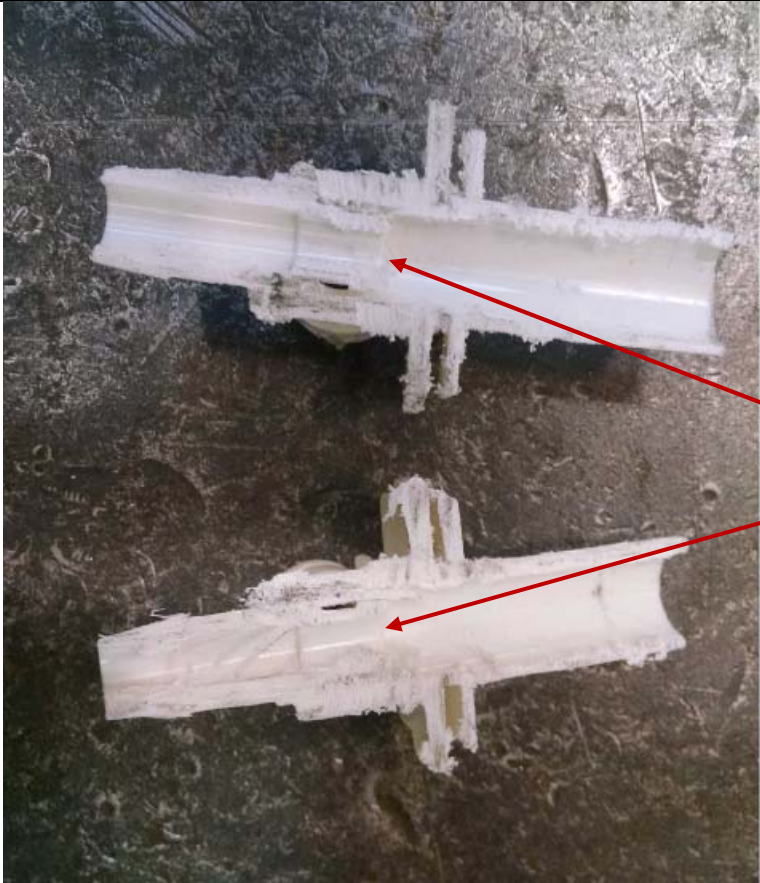
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="1472 764 1677 854">Valve Seat of Valve</p> <p data-bbox="680 1224 1045 1260">(Photograph of Gen 3 Koge)</p> <p data-bbox="680 1313 1986 1382">The solenoid is seen in a partially deconstructed state below. The solenoid includes a solenoid plunger within the enclosure that is capable of connecting or coupling to the valve seat.</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>(Photograph of Gen 3 Koge)</p> |

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

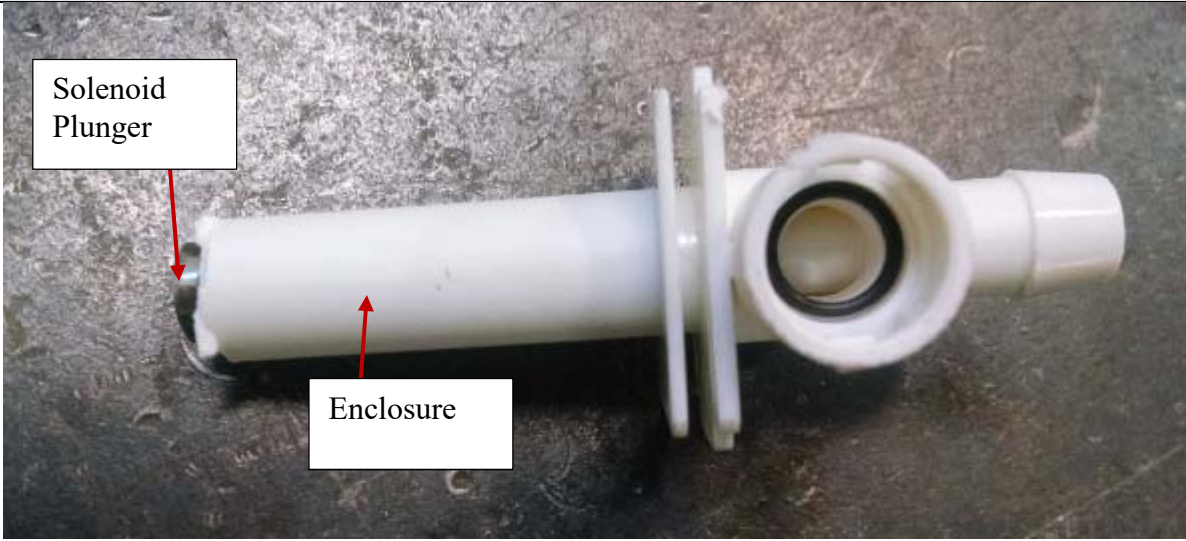
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photograph of Gen 3 Koge)</p> <p>The valve is fluidly coupled to the bladder of an air inflatable mattress. For example, as seen in the photographs below, tubing fluidly couples the valve enclosure assembly to one or more bladders.</p> |

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

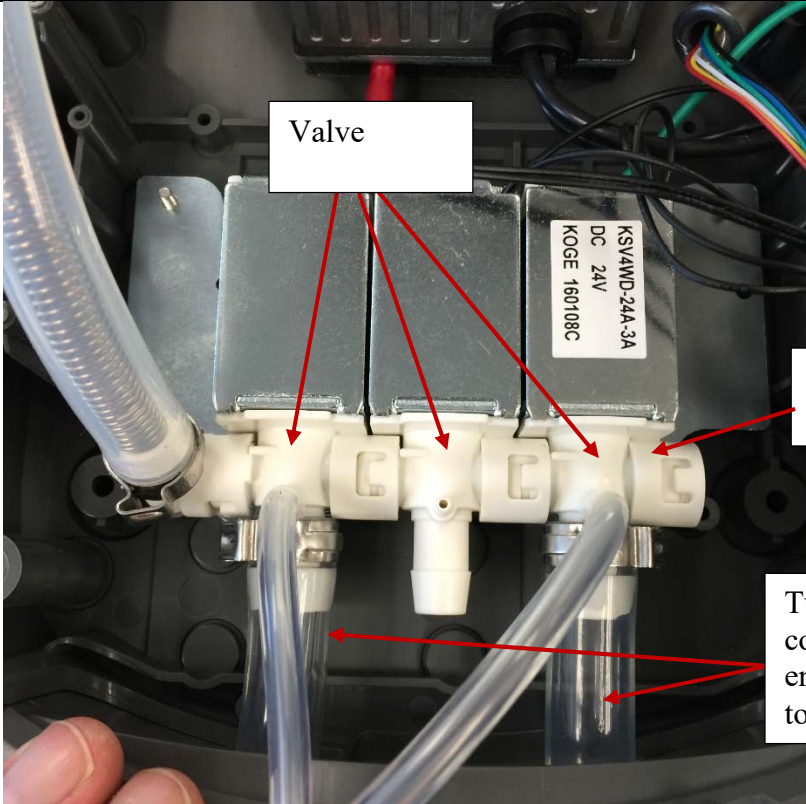
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>(Photographs of Gen 3 Koge)</p> <p>When the valve is open, air can pass from the substantially fluidly sealed air chamber of the valve enclosure assembly through the valve and through the tubing fluidly connecting the valve enclosure assembly to the bladder of the air inflatable mattress. Thus, when open, the valve allows for the fluidly coupling of the air chamber to at least one air bladder. However, this fluid coupling is selective or selectable because when the valve is closed, air cannot pass from the air chamber through the valve.</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|--|--|
| | <p>Accordingly, the valve is capable of being in selective fluid communication with the air chamber. Thus, when closed, the air chamber and the air bladder are not fluidly coupled.</p> |
| <p>[12.3] pressure monitor means being operably coupled to the processor and being in fluid communication with the at least one valve for monitoring the pressure in the at least one bladder.</p> | <p>The “pressure monitor means” is a means-plus-function limitation subject to pre-AIA 35 U.S.C. § 112, ¶ 6. The function is monitoring the pressure in the at least one bladder. The structure is a port fluidly coupled to the interior of the valve enclosure assembly that is designed to receive a tube, a pressure sensor, and a tube connected to the port and to the pressure sensor, and equivalents thereof. Under this construction, and where the other claim terms are given their plain and ordinary meaning in light of the specification, the Gen 3 Arco, Gen X, and Gen 3 Koge Air Controllers include a pressure monitor means being operably coupled to the processor and being in fluid communication with the at least one valve for monitoring the pressure in the at least one bladder.</p> <p>The Accused Products having a Gen 3 Arco air controller include pressure monitor means operably coupled to the processor. Specifically, the valve enclosure assembly of the Gen 3 Arco includes a pressure monitoring port, which is capable of being in fluid communication with the interior of the enclosure of the valve enclosure assembly.</p> |

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

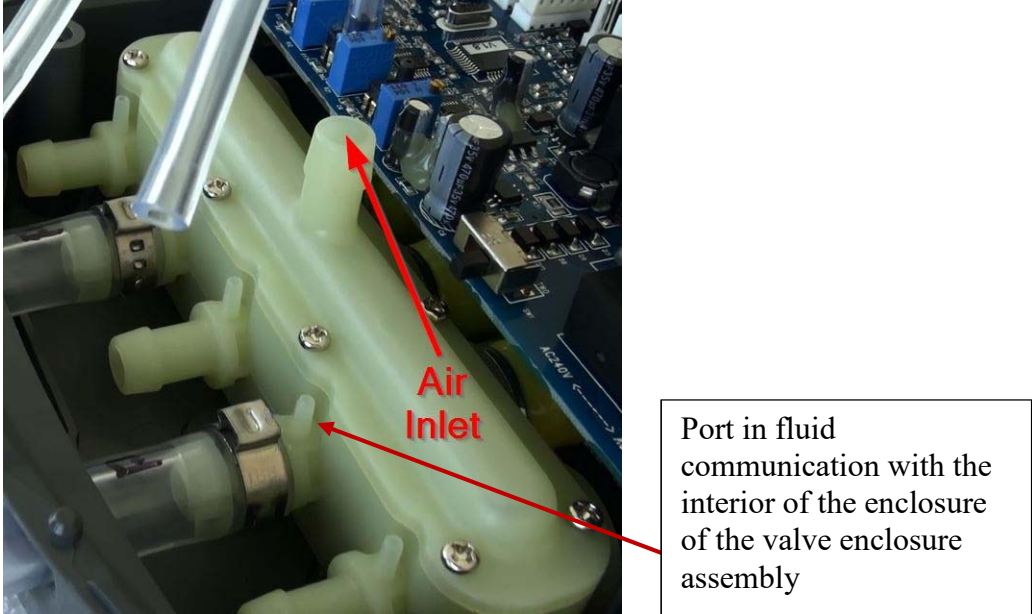
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>Gen 3 Arco:</p>  <p>(Photograph of Gen 3 Arco)</p> <p>As seen, a tube is connected to the pressure monitoring port. The tube is also connected to a pressure sensor. In addition, and as discussed above, the pressure in the one or more air bladders is conveyed to the enclosure of the valve enclosure assembly via the tubing that fluidly couples the valve enclosure assembly to the air bladder(s). The pressure monitoring port is located between the valve(s) and the air bladder(s).</p> |

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

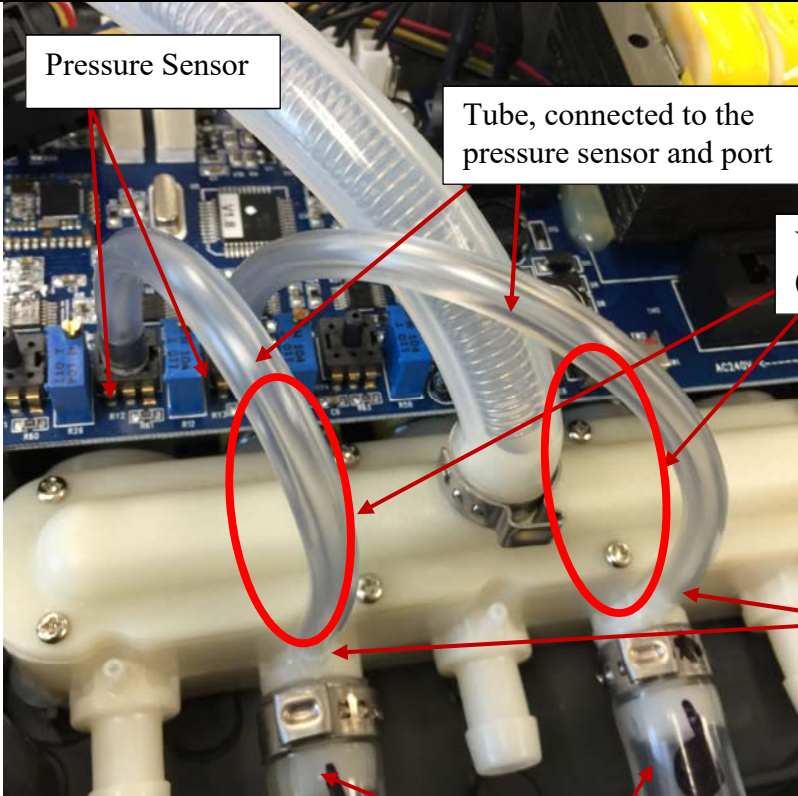
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>Pressure Sensor</p> <p>Tube, connected to the pressure sensor and port</p> <p>Valve (general location)</p> <p>Port in fluid communication with the interior of the enclosure of the valve enclosure assembly</p> <p>(Photograph of the Gen 3 Arco)</p> <p>Tubing Fluidly Coupling the Valve Enclosure Assembly to an Air Bladder</p> |

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

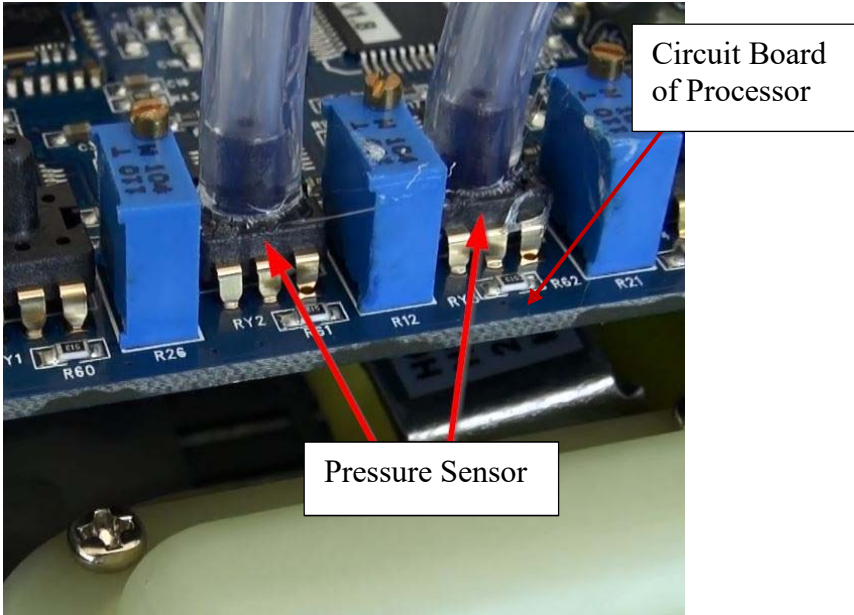
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The pressure sensor is operatively coupled to a processor. The processor is configured to monitor and capable of continuously monitoring the pressure detected by the pressure sensor.</p>  <p>(Photograph of Gen 3 Arco)</p> <p>The pressure monitor means is capable of being in fluid communication with the at least one valve for continuously monitoring the pressure in the at least one bladder. Tubing connects the pressure sensor(s) to the pressure monitoring port(s) of the valve enclosure assembly, the pressure sensor is capable of being in fluid communication with the enclosure of the valve enclosure assembly. Because the valve is located just upstream of the pressure monitoring port, the valve and the pressure monitoring port are in fluid communication. Accordingly, the pressure sensor is capable of being in fluid communication with the valve. Tubing fluidly couples the valve enclosure assembly to the air bladder(s), the valve, pressure monitoring port, and air bladder(s) are capable of being in fluid</p> |

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

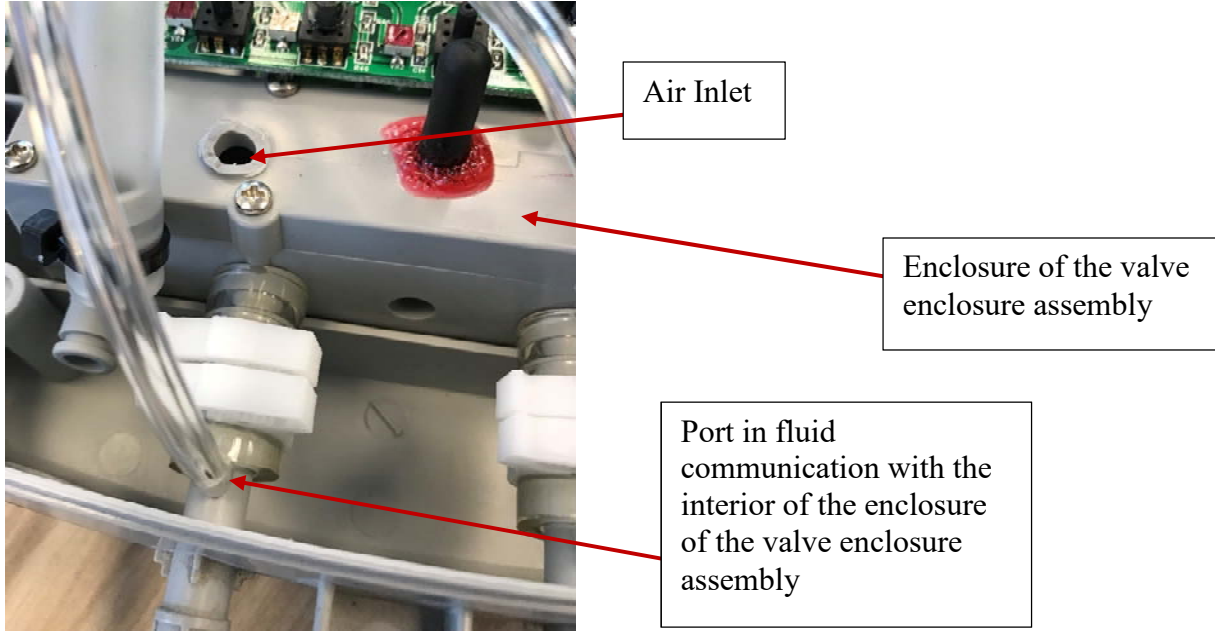
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <p>communication with each other. The pressure sensor and the processor of the pressure monitor means is therefore able to or capable of continuously monitoring the pressure in the air bladder(s) by monitoring the pressure conveyed from the pressure monitoring port.</p> <p>The Accused Products having a Gen X air controller include pressure monitor means operably coupled to the processor. Specifically, the valve enclosure assembly of the Gen X includes a pressure monitoring port, which is capable of being in fluid communication with the interior of the enclosure of the valve enclosure assembly.</p> <p>Gen X:</p>  <p>(Photograph of Gen X)</p> |

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

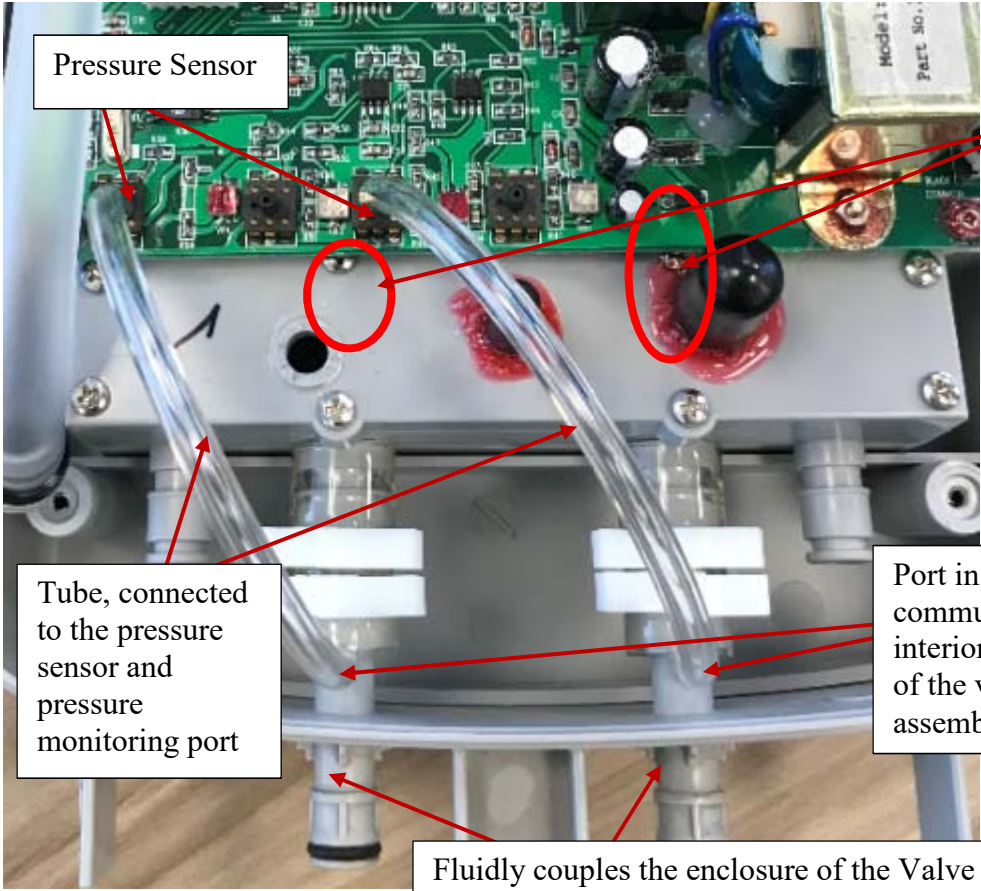
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>As seen, a tube is connected to the pressure monitoring port and to a pressure sensor. In addition, and as discussed above, the pressure in the one or more air bladders is conveyed to the enclosure of the valve enclosure assembly via the tubing that fluidly couples the valve enclosure assembly to the air bladder(s). The pressure monitoring port is located between the valve(s) and the air bladder(s).</p>  <p>(Photograph of the Gen X)</p> |

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

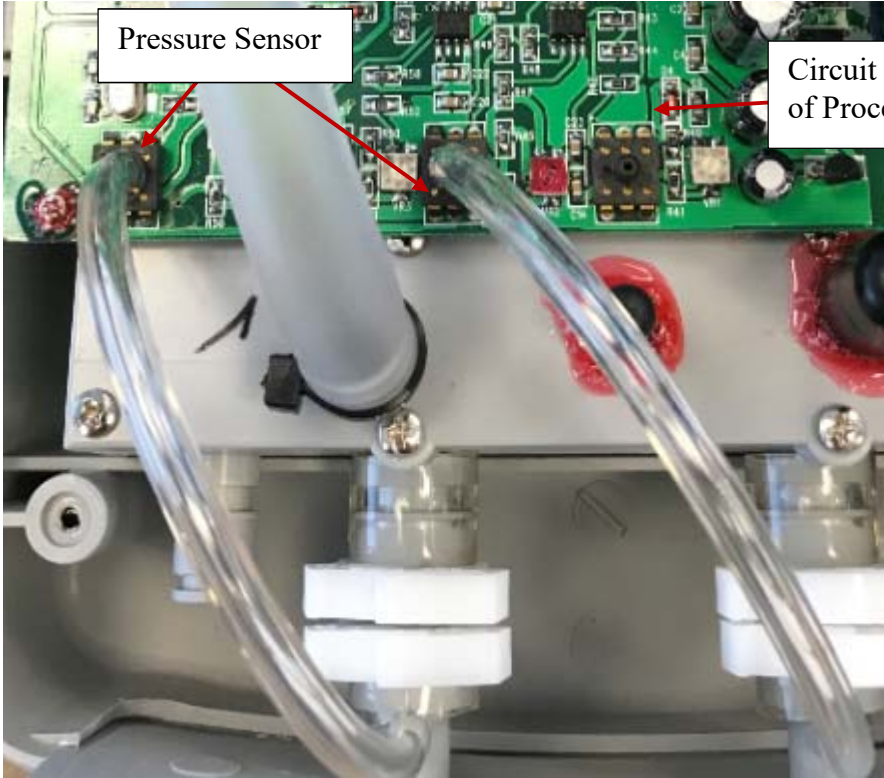
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>The pressure sensor is operatively coupled to a processor. The processor is configured to monitor and capable of continuously monitoring the pressure detected by the pressure sensor.</p>  <p>(Photograph of Gen X)</p> <p>The pressure monitor means is capable of being in fluid communication with the at least one valve for continuously monitoring the pressure in the at least one bladder. Tubing connects the pressure sensor(s) to the pressure monitoring port(s) of the valve enclosure assembly, the pressure sensor is</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <p>capable of being in fluid communication with the enclosure of the valve enclosure assembly. Because the valve is located just upstream of the pressure monitoring port, the valve and the pressure monitoring port are in fluid communication. Accordingly, the pressure sensor is capable of being in fluid communication with the valve. Tubing fluidly couples the valve enclosure assembly to the air bladder(s), the valve, pressure monitoring port, and air bladder(s) are capable of being in fluid communication with each other. The pressure sensor and the processor of the pressure monitor means is therefore able to or capable of continuously monitoring the pressure in the air bladder(s) by monitoring the pressure conveyed from the pressure monitoring port.</p> <p>The Accused Products having a Gen 3 Koge air controller include pressure monitor means operably coupled to the processor. Specifically, the enclosure of the valve enclosure assembly of the Gen 3 Koge includes a pressure monitoring port, which is capable of being in fluid communication with the interior of the enclosure of the valve enclosure assembly.</p> |

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

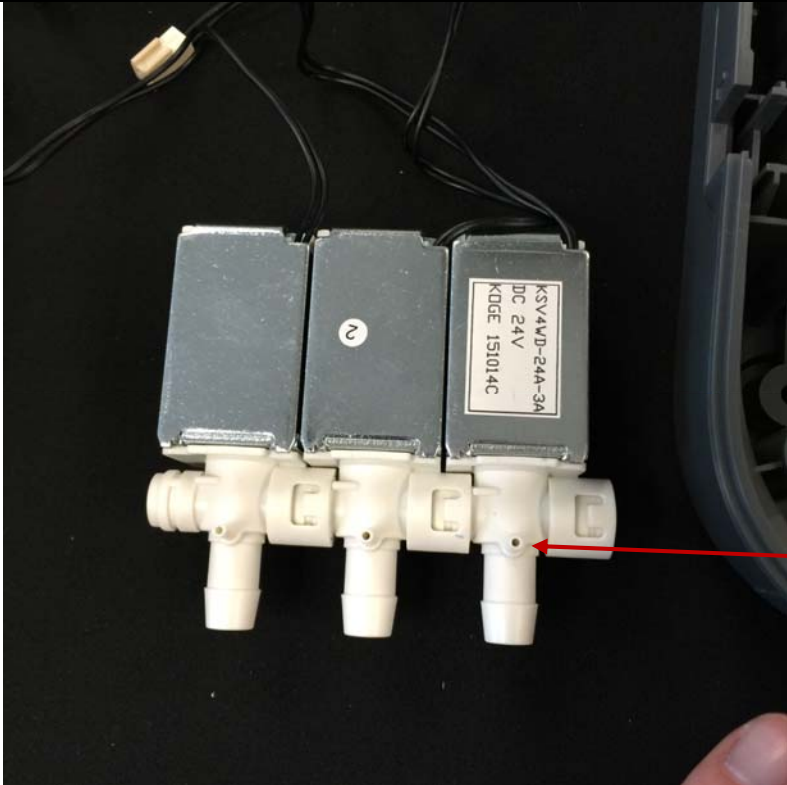
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| |  <p data-bbox="1520 756 1885 976">Port in fluid communication with the interior of the enclosure of the valve enclosure assembly</p> <p data-bbox="680 1130 1050 1162">(Photograph of Gen 3 Koge)</p> <p data-bbox="680 1219 1976 1393">As seen in the photograph above, a tube is connected to the pressure monitoring port. The tube is also connected to a pressure sensor. In addition, and as discussed above, the valve is capable of being in fluid communication with the one or more air bladders via tubing that fluidly couples the two components. The valve is also just upstream of the pressure monitoring port, and is therefore capable of being in fluid communication with the pressure monitoring port. Accordingly, when the pressure</p> |

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

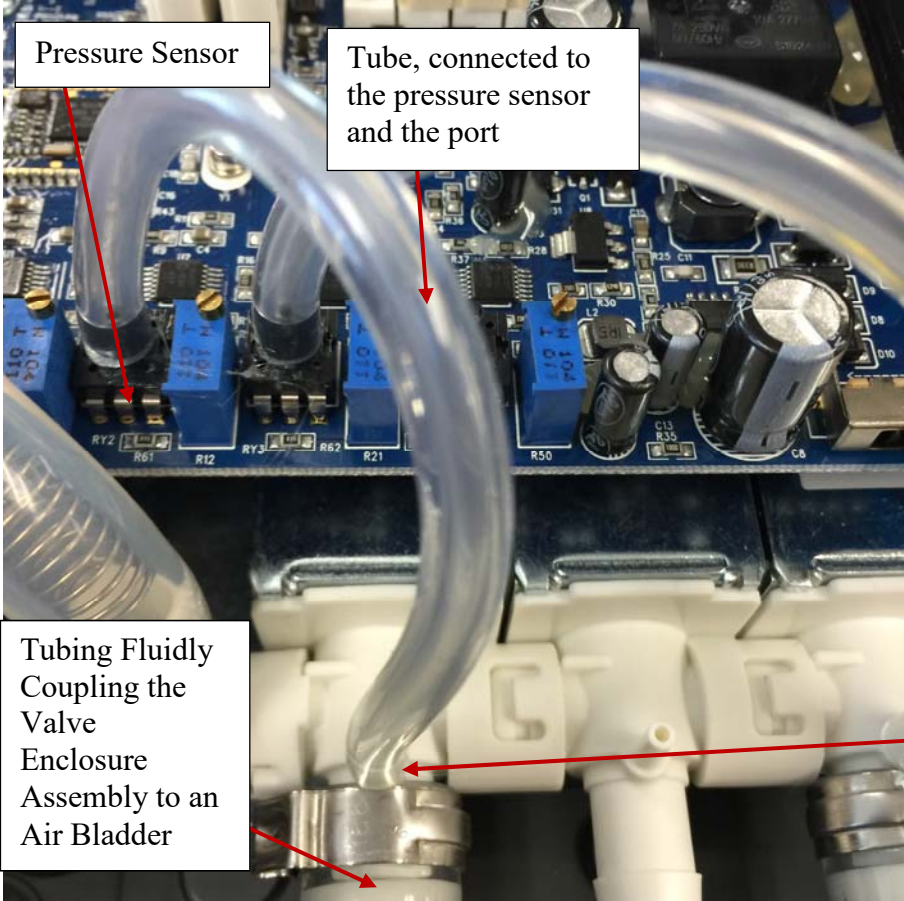
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <p>from the pressure monitoring port is conveyed to the pressure sensor from the enclosure of the valve enclosure assembly via the tubing connected to the pressure monitoring port and pressure sensor, the pressure monitor means can monitor the pressure in the at least one bladder.</p>  <p>Pressure Sensor</p> <p>Tube, connected to the pressure sensor and the port</p> <p>Tubing Fluidly Coupling the Valve Enclosure Assembly to an Air Bladder</p> <p>Port in fluid communication with the interior of the enclosure of the valve enclosure assembly</p> <p>(Photograph of the Gen 3 Koge)</p> |

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

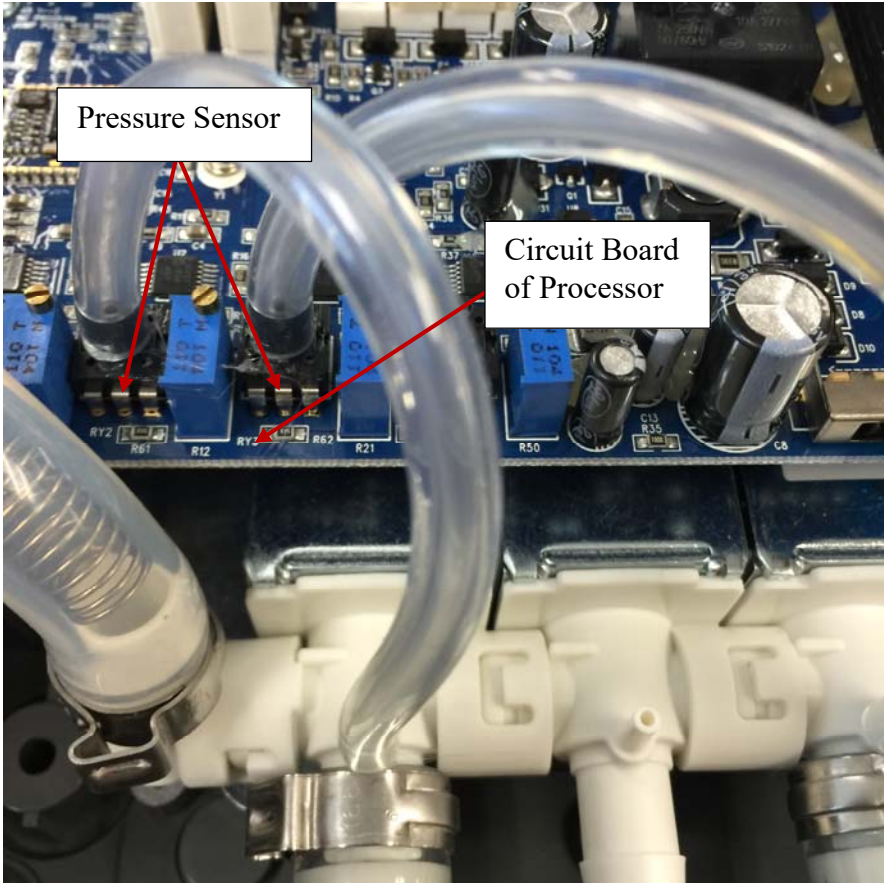
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>The pressure sensor is operatively coupled to a processor. The processor is configured to monitor and capable of continuously monitoring the pressure detected by the pressure sensor.</p>  <p>(Photograph of Gen 3 Koge)</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <p>Versions 1.8, 1.9, 1.92, 1.97, and 2.0 of the source code further demonstrate that Gen 3 Accused Products' processors are configured to monitor and do monitor, or are capable of monitoring, the pressure detected by the pressure sensor(s).</p>  |

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

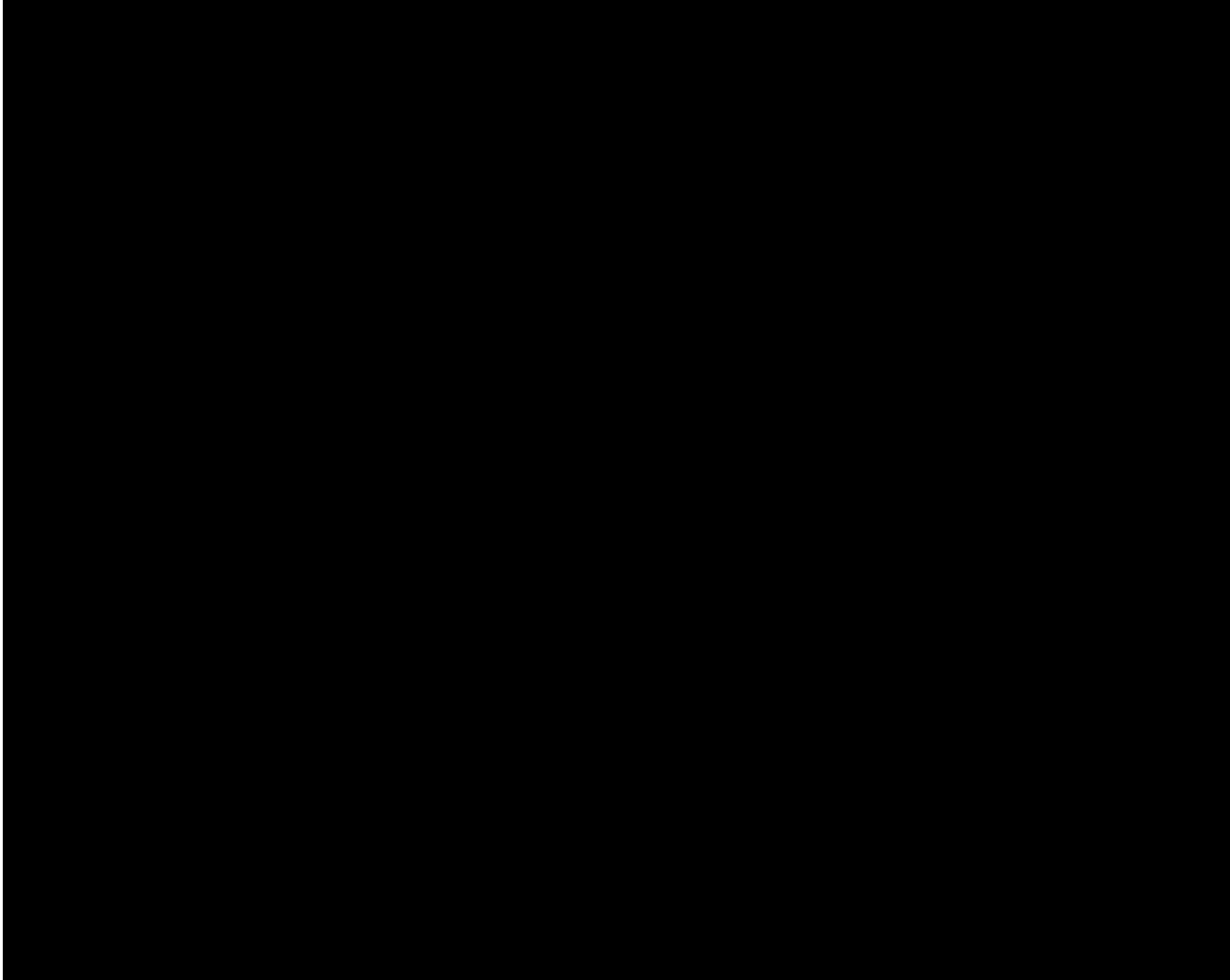
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| |  A large black rectangular redaction covers the entire content area of the table, obscuring all text and data. |

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

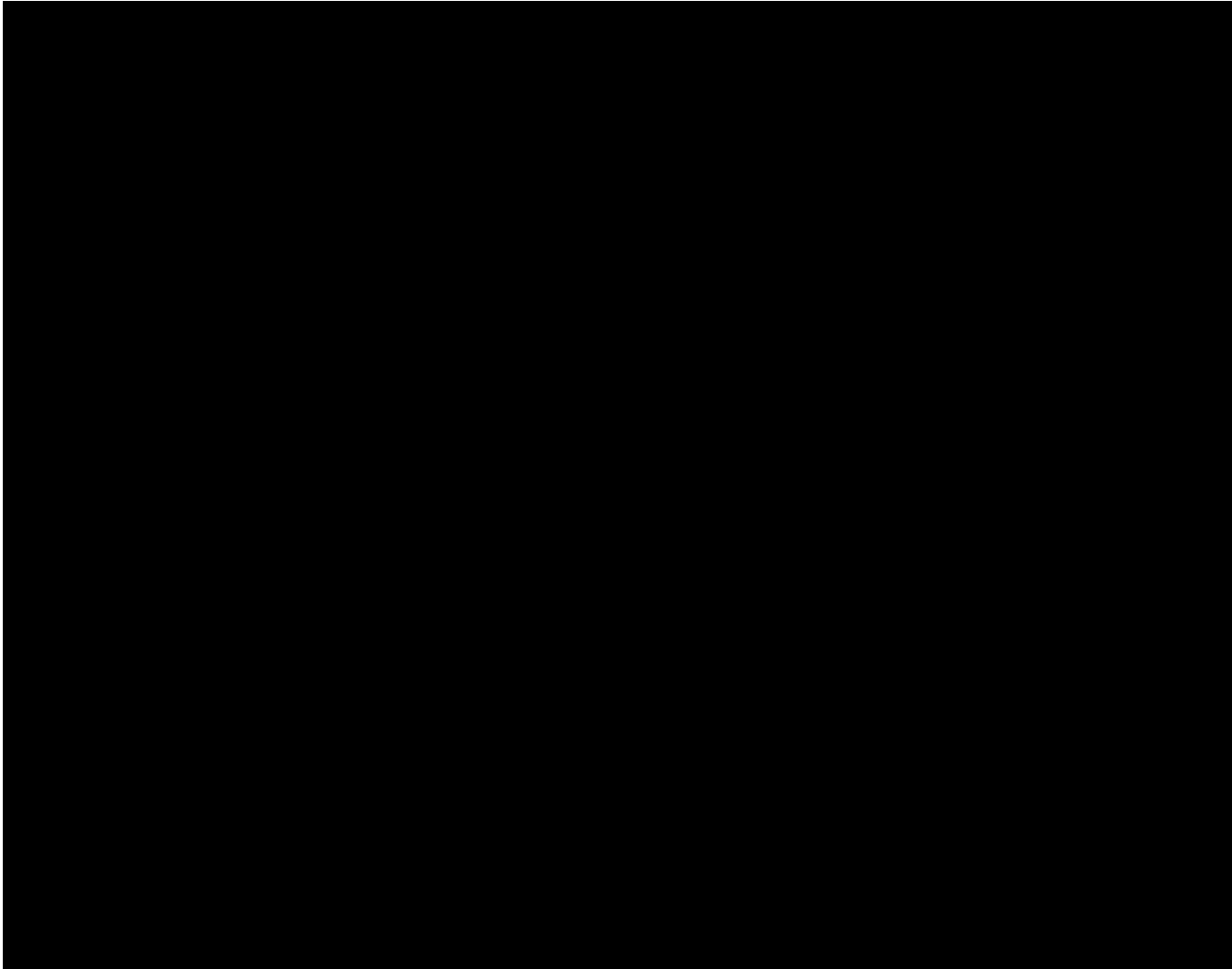
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|----------------------|--|
| |  A large black rectangular redaction covers the entire content area of the table, obscuring all text and data that would otherwise be present in the 'INFRINGEMENT CONTENTIONS' column. |

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

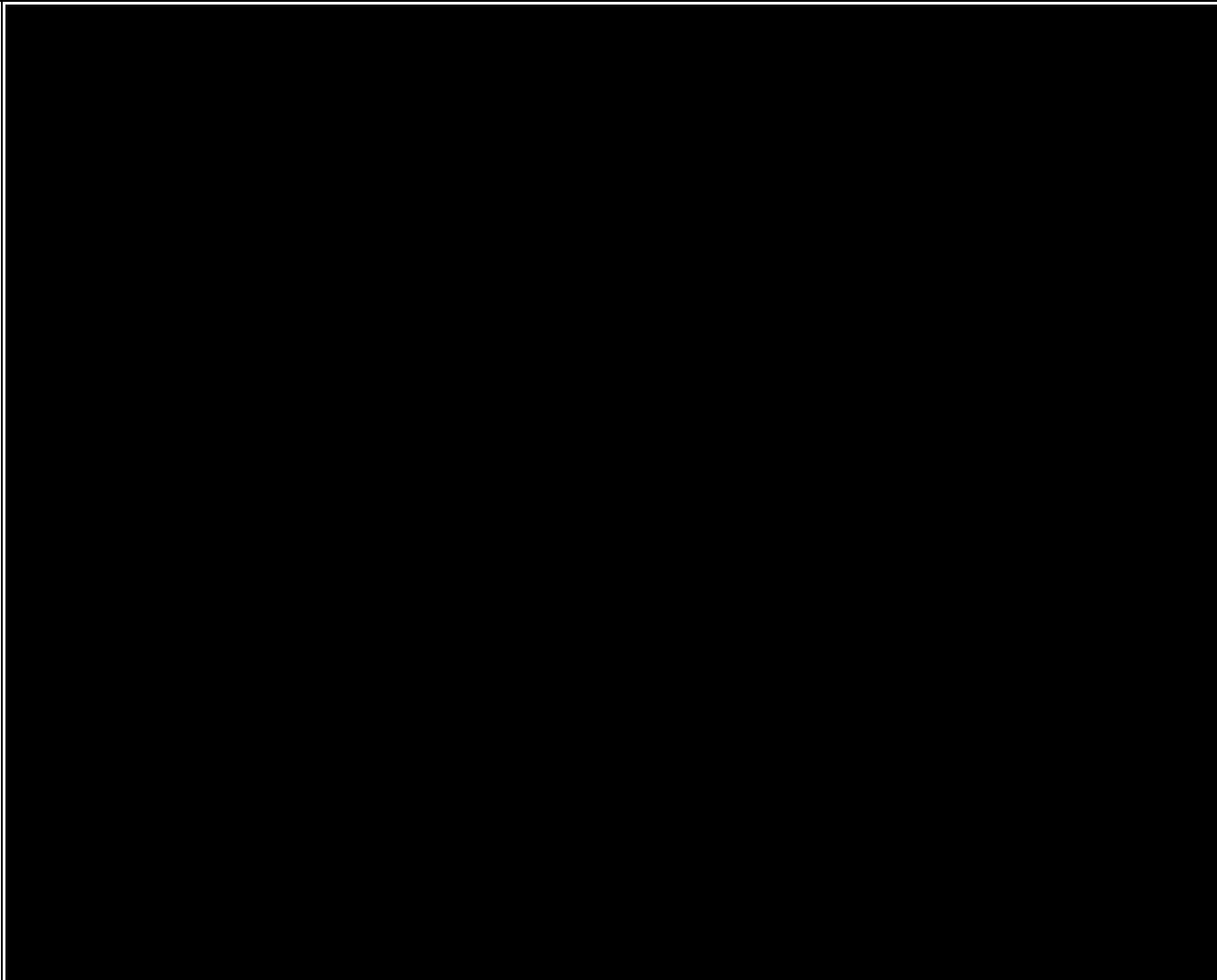
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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EXHIBIT A1 - U.S. PATENT NO. 5,904,172 VERSUS AMERICAN NATIONAL MANUFACTURING ACCUSED PRODUCTS

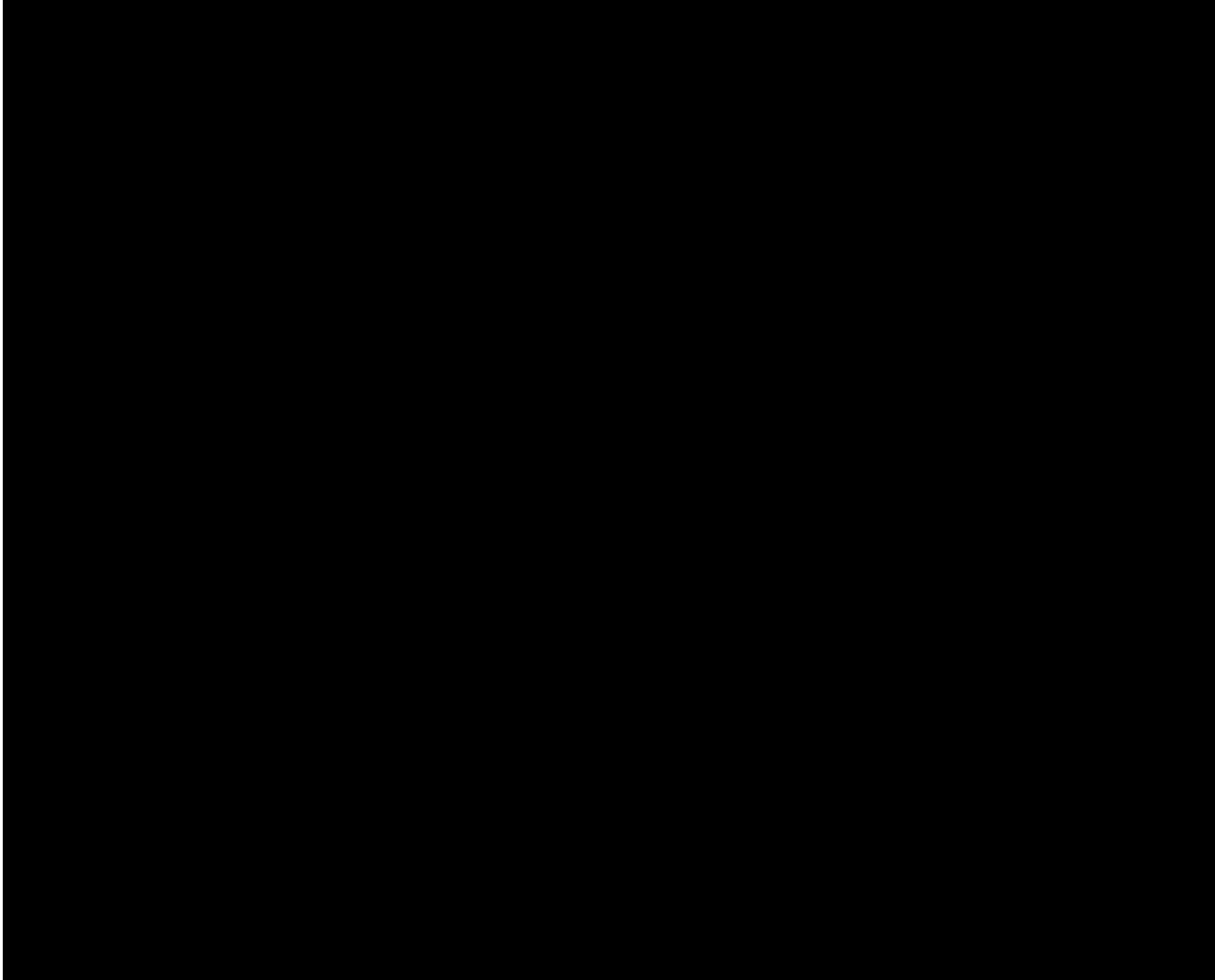
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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EXHIBIT A1 - U.S. PATENT NO. 5,904,172 VERSUS AMERICAN NATIONAL MANUFACTURING ACCUSED PRODUCTS

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---|---|
| | <div data-bbox="680 347 2003 766" style="background-color: black; width: 100%; height: 258px; margin-bottom: 10px;"></div> <p data-bbox="680 818 1976 1068">This limitation may further implicate other electronics, software, firmware, and/or source code of the Accused Products. Additional Source Code for the Accused Products may further show how this claim limitation is met. To resolve a dispute regarding Plaintiff’s Notice of Inspection for Source Code, the parties have agreed that Plaintiff shall be allowed to inspect remaining Source Code for the Accused Products on mutually agreeable date(s), after which Plaintiff shall supplement its infringement contentions, pursuant to an agreed-upon timeline and without opposition, using the information learned during the inspection.</p> |
| <p data-bbox="107 1138 233 1162">Claim 16</p> | |
| <p data-bbox="107 1192 653 1401">[16.P] 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</p> | <p data-bbox="680 1192 1990 1401">The preamble of claim 16 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</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---|---|
| <p>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, comprising:</p> | <p>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> <div data-bbox="676 669 1390 1383" data-label="Image"> <p>The photograph shows the internal components of a Gen 3 Arco air controller. At the top is a large, white, ribbed cylindrical pump. Below it is a blue printed circuit board (PCB) with various electronic components. A clear plastic tube is connected to the pump and leads to a white, cylindrical valve enclosure assembly at the bottom. A red arrow points from a text box to this assembly.</p> </div> <div data-bbox="1486 1156 1738 1307" data-label="Text"> <p>Enclosure of Valve Enclosure Assembly</p> </div> <p>(Photograph of Gen 3 Arco)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <p>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:</p>  <p>(Photograph of Gen X)</p> <p>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:</p> |



Enclosure of Valve Enclosure Assembly

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

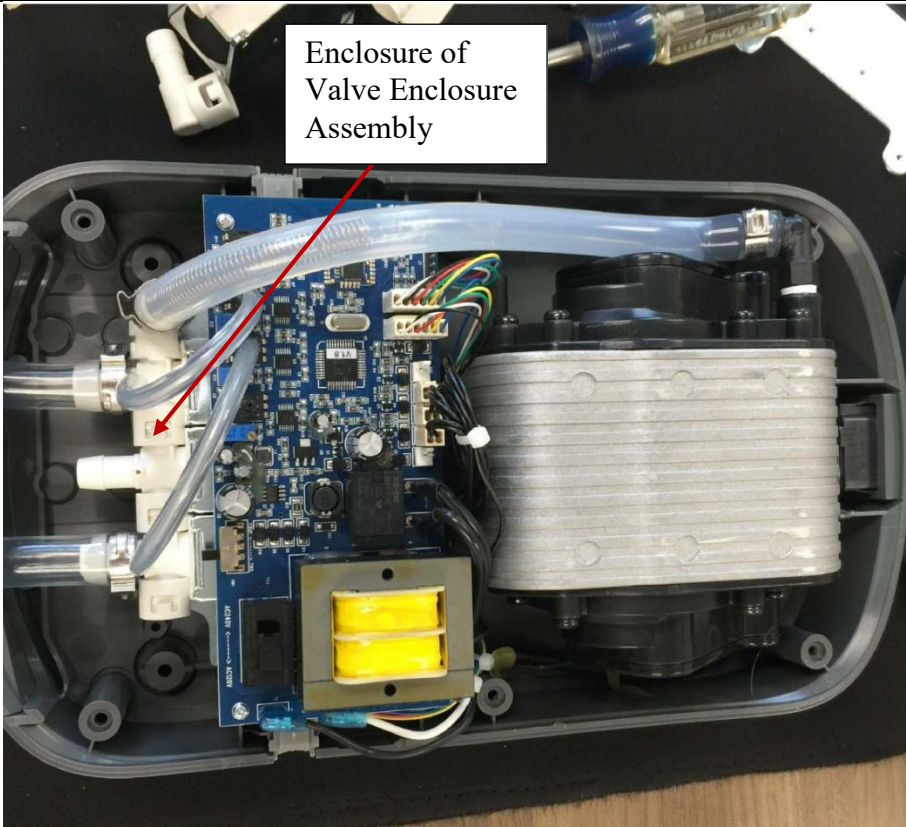
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="961 363 1222 500">Enclosure of Valve Enclosure Assembly</p> <p data-bbox="680 1172 1050 1205">(Photograph of Gen 3 Koge)</p> <p data-bbox="680 1260 1965 1367">The valve enclosure assemblies of the Gen 3 Arco, Gen X, 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.</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1453 381 1722 474">Air Inflatable Mattress</p> <p data-bbox="682 868 997 1015">Air Controller containing the Valve Enclosure Assembly</p> |

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

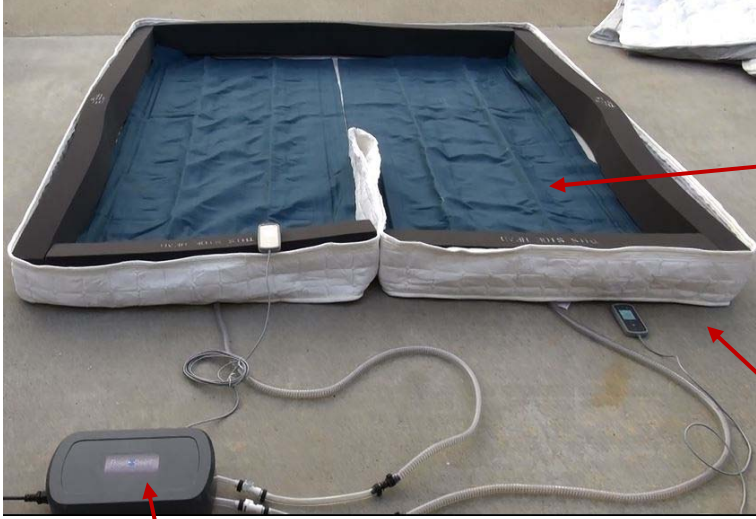
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| |  <p>A photograph showing a blue inflatable mattress system. The mattress is laid out on a light-colored floor, with its air bladder inflated. A black air controller unit is connected to the mattress via a grey hose. A red arrow points from the text box 'Air Bladder of Air Inflatable Mattress, which is inflatable by compressed air' to the blue surface of the mattress. Another red arrow points from the text box 'Air Inflatable Mattress' to the entire mattress assembly. A third red arrow points from the text box 'Air Controller containing the Valve Enclosure Assembly' to the black control unit.</p> <p data-bbox="1499 386 1808 570">Air Bladder of Air Inflatable Mattress, which is inflatable by compressed air</p> <p data-bbox="1499 724 1766 818">Air Inflatable Mattress</p> <p data-bbox="747 886 1062 1029">Air Controller containing the Valve Enclosure Assembly</p> |

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

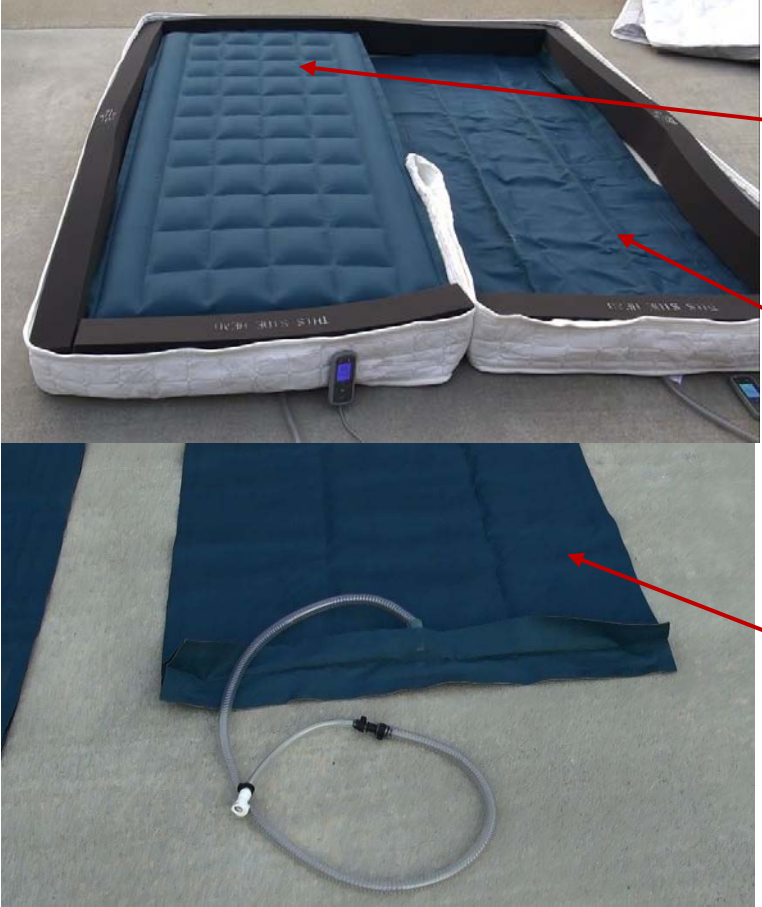
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| |  <p data-bbox="1470 357 1774 544">Air Bladder of Air Inflatable Mattress, inflated by compressed air</p> <p data-bbox="1470 568 1774 755">Air Bladder of Air Inflatable Mattress, deflated</p> <p data-bbox="1470 860 1785 1047">Air Bladder of Air Inflatable Mattress, which is inflatable by compressed air</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <div data-bbox="699 354 970 451" style="border: 1px solid black; padding: 5px; width: fit-content;">Air Inflatable Mattress</div> <div data-bbox="1627 378 1942 565" style="border: 1px solid black; padding: 5px; width: fit-content;">Bladders of Air Inflatable Mattress, which are inflatable by compressed air</div> <div data-bbox="1570 755 1885 901" style="border: 1px solid black; padding: 5px; width: fit-content;">Air Controller containing the Valve Enclosure Assembly</div>  <p data-bbox="678 1011 1249 1044">(Photograph of medical air mattress system)</p> <p data-bbox="678 1101 1969 1421">In the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers, the pump is fluidly coupled to the at least one air bladder for providing compressed air thereto. In the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers, the improved valve enclosure assembly is fluidly coupled intermediate the pump and the at least one air bladder for controlling the inflation of the at least one air bladder. As shown in the photographs below, the pump is fluidly coupled to the enclosure of the valve enclosure assembly via tubing. The enclosure of the valve enclosure assembly is then similarly fluidly coupled to the at least one air bladder with tubing. The pump provides compressed air to the at least one air bladder via the tubing between the pump and the enclosure of the valve enclosure assembly and the tubing between the valve enclosure assembly and the air bladder.</p> |

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

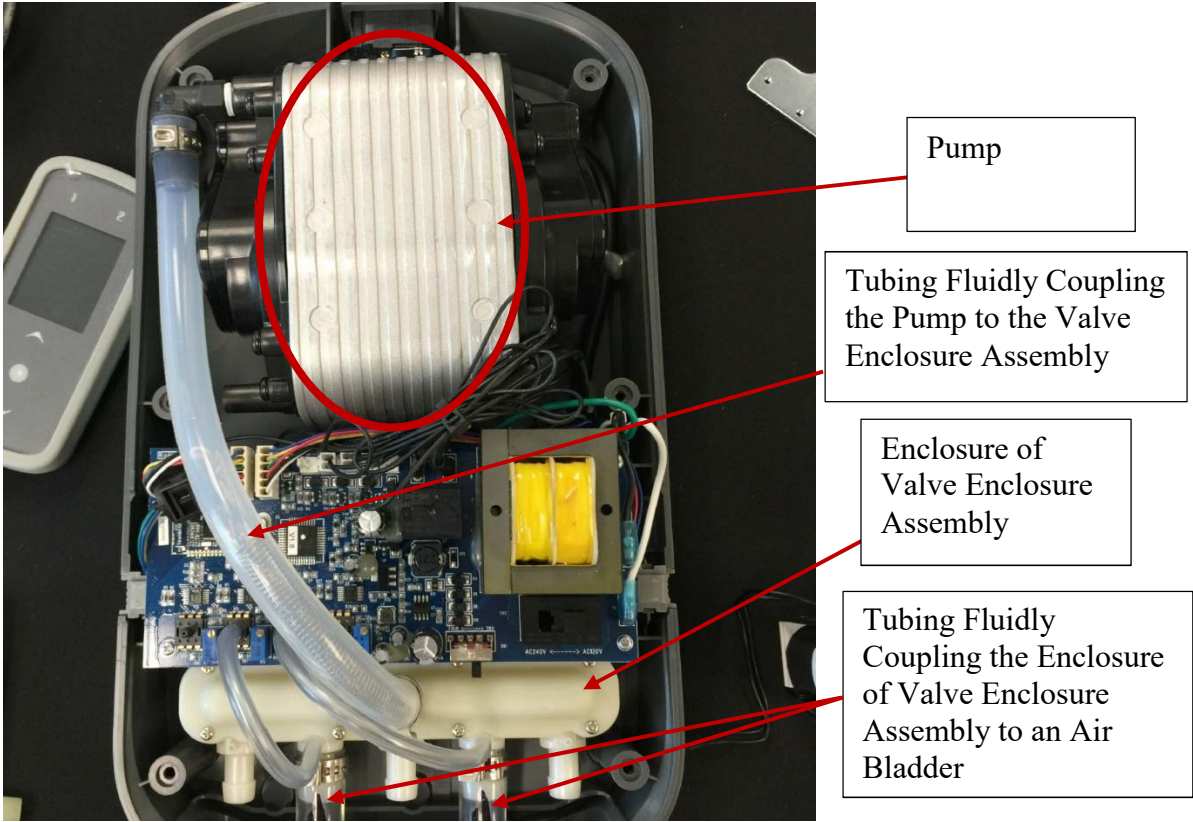
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <p>Gen 3 Arco:</p>  <p>(Photograph of Gen 3 Arco)</p> |

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

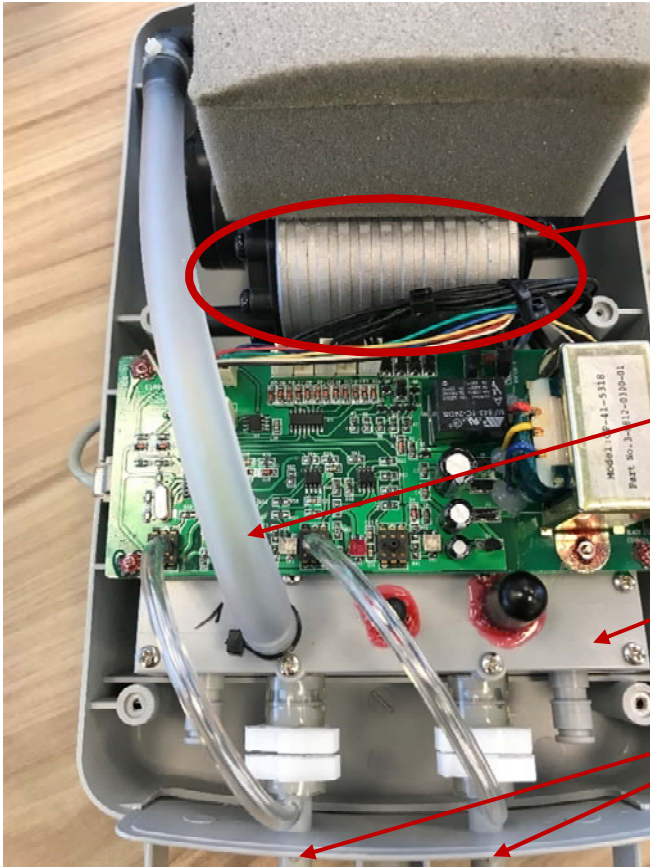
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <p>Gen X:</p>  <p>(Photograph of Gen X)</p> <p>Pump</p> <p>Tubing Fluidly Coupling the Pump to the Enclosure of the Valve Enclosure Assembly</p> <p>Enclosure of Valve Enclosure Assembly</p> <p>Fluidly Couples the Enclosure of Valve Enclosure Assembly to an Air Bladder</p> |

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

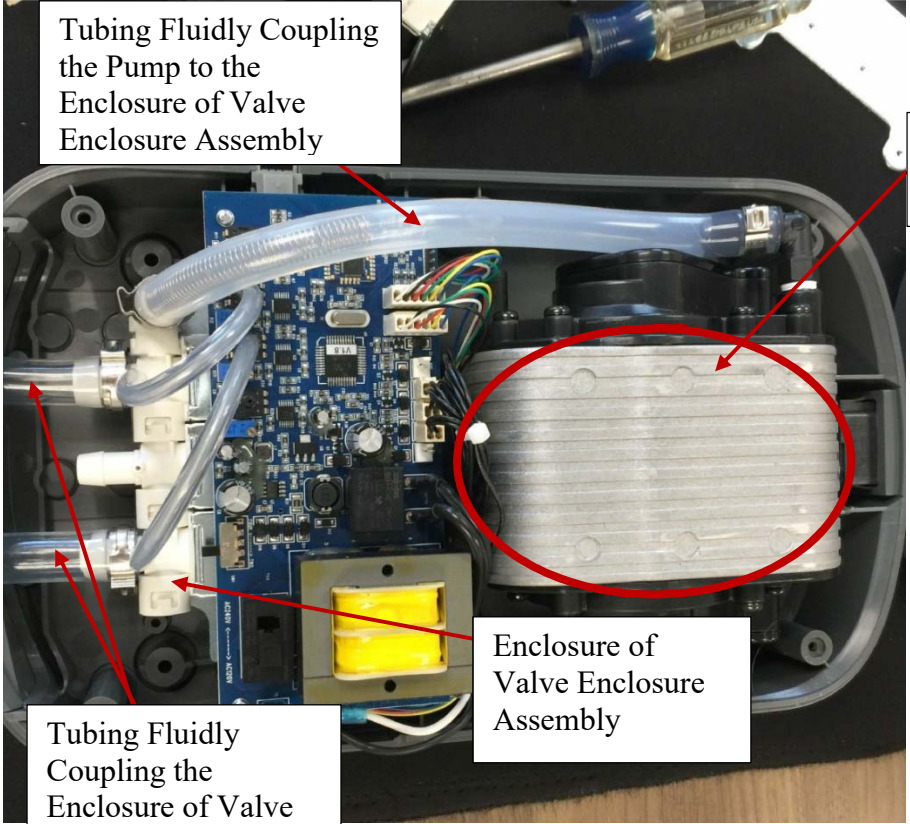
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <p>Gen 3 Koge:</p>  <p>(Photograph of Gen 3 Koge)</p> |

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

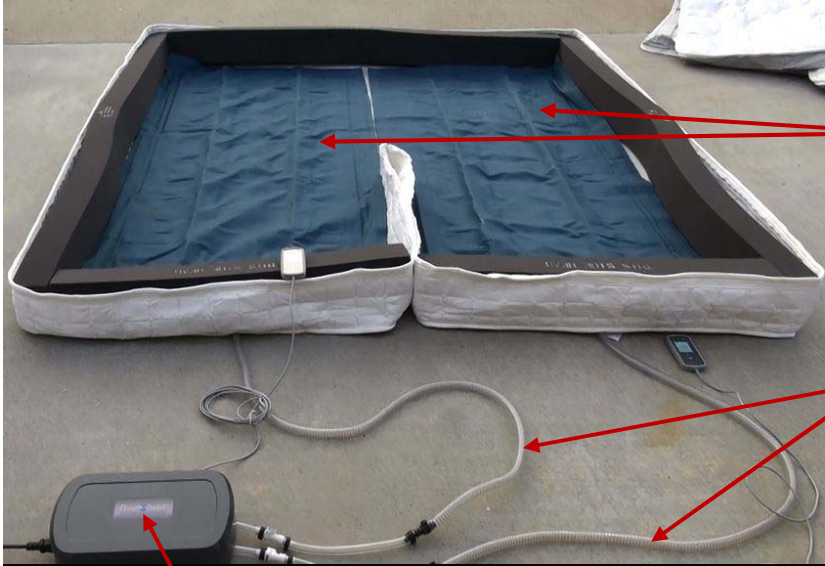
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <p>As shown in the example of a Gen 3 air controller being used with an inflatable air mattress, the two tubes that fluidly couple to the valve enclosure assembly fluidly couple to the air bladders of the inflatable air mattress. Because the pump is fluidly coupled to the air bladder, the air bladders inflate using the compressed air from the pump.</p>  <p data-bbox="1562 521 1877 708">Air Bladders of Air Inflatable Mattress, which are inflated using compressed air</p> <p data-bbox="1541 753 1848 940">Tubing Fluidly Coupling the Valve Enclosure Assembly to an Air Bladder</p> <p data-bbox="781 1068 1096 1211">Air Controller containing the Valve Enclosure Assembly</p> <p>In the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers, a processor provides commands to the improved valve enclosure assembly during an inflate/deflate cycle:</p> |

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

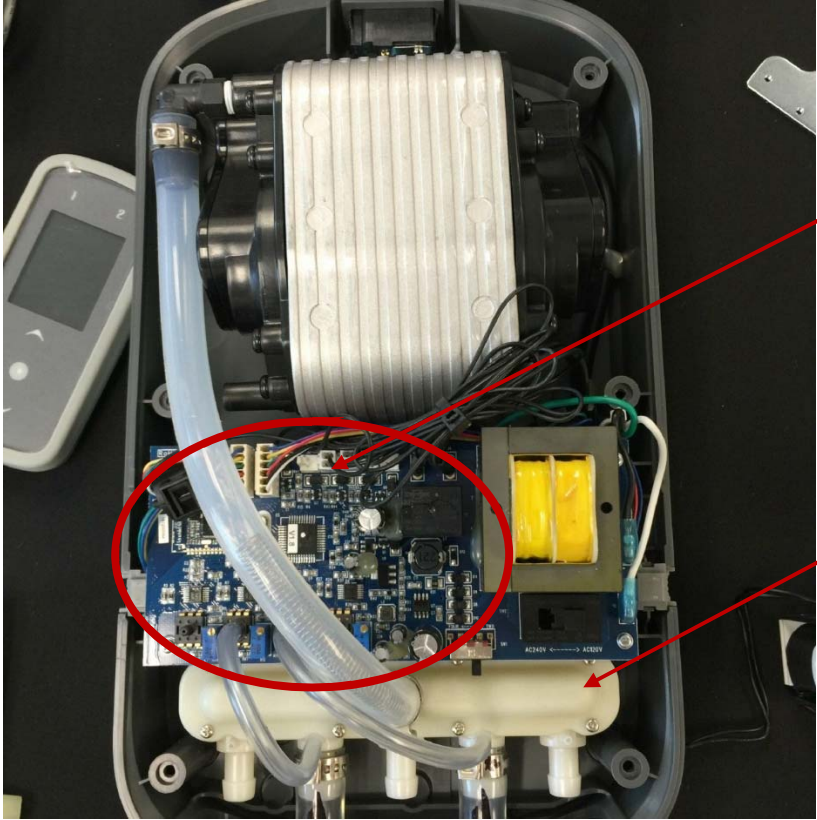
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <p>Gen 3 Arco:</p>  <p>Printed Circuit Board for Processor, which provides commands to the improved valve enclosure assembly during an inflate/deflate cycle</p> <p>Enclosure of Valve Enclosure Assembly</p> <p>(Photograph of Gen 3 Arco)</p> |

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

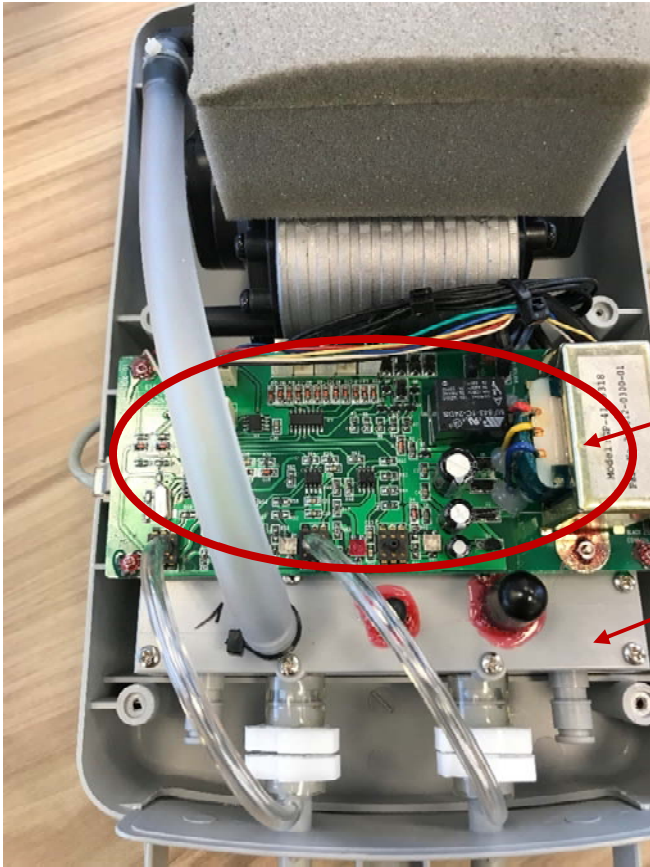
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <p>Gen X:</p>  <p>(Photograph of Gen X)</p> <div data-bbox="1486 524 1864 773" style="border: 1px solid black; padding: 5px;"> <p>Printed Circuit Board for Processor, which provides commands to the improved valve enclosure assembly during an inflate/deflate cycle</p> </div> <div data-bbox="1541 797 1812 943" style="border: 1px solid black; padding: 5px;"> <p>Enclosure of Valve Enclosure Assembly</p> </div> |

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

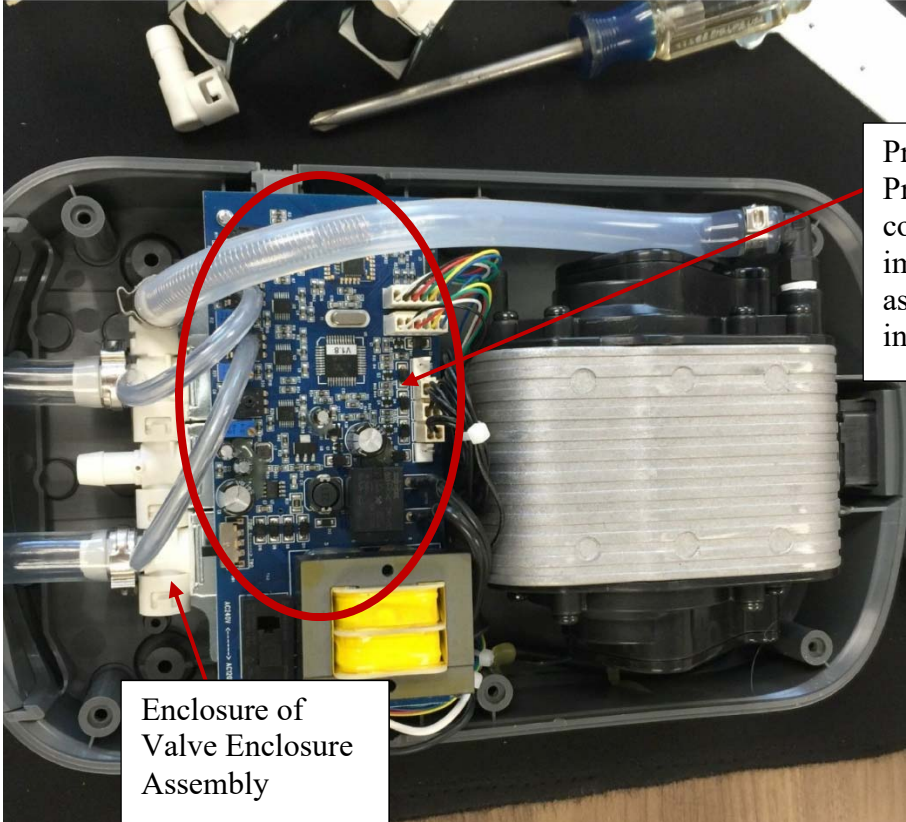
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <p>Gen 3 Koge:</p>  <p>Printed Circuit Board for Processor, which provides commands to the improved valve enclosure assembly during an inflate/deflate cycle</p> <p>Enclosure of Valve Enclosure Assembly</p> <p>(Photograph of Gen 3 Koge)</p> <p>Versions 1.8, 1.9, 1.92, 1.97, and 2.0 of ANM's source code further demonstrate that the Gen 3 Accused Products include a processor for providing commands to the improved valve enclosure assembly during an inflate/deflate cycle.</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| |  A large black rectangular redaction covers the entire content area of the table, obscuring all text and data. |

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

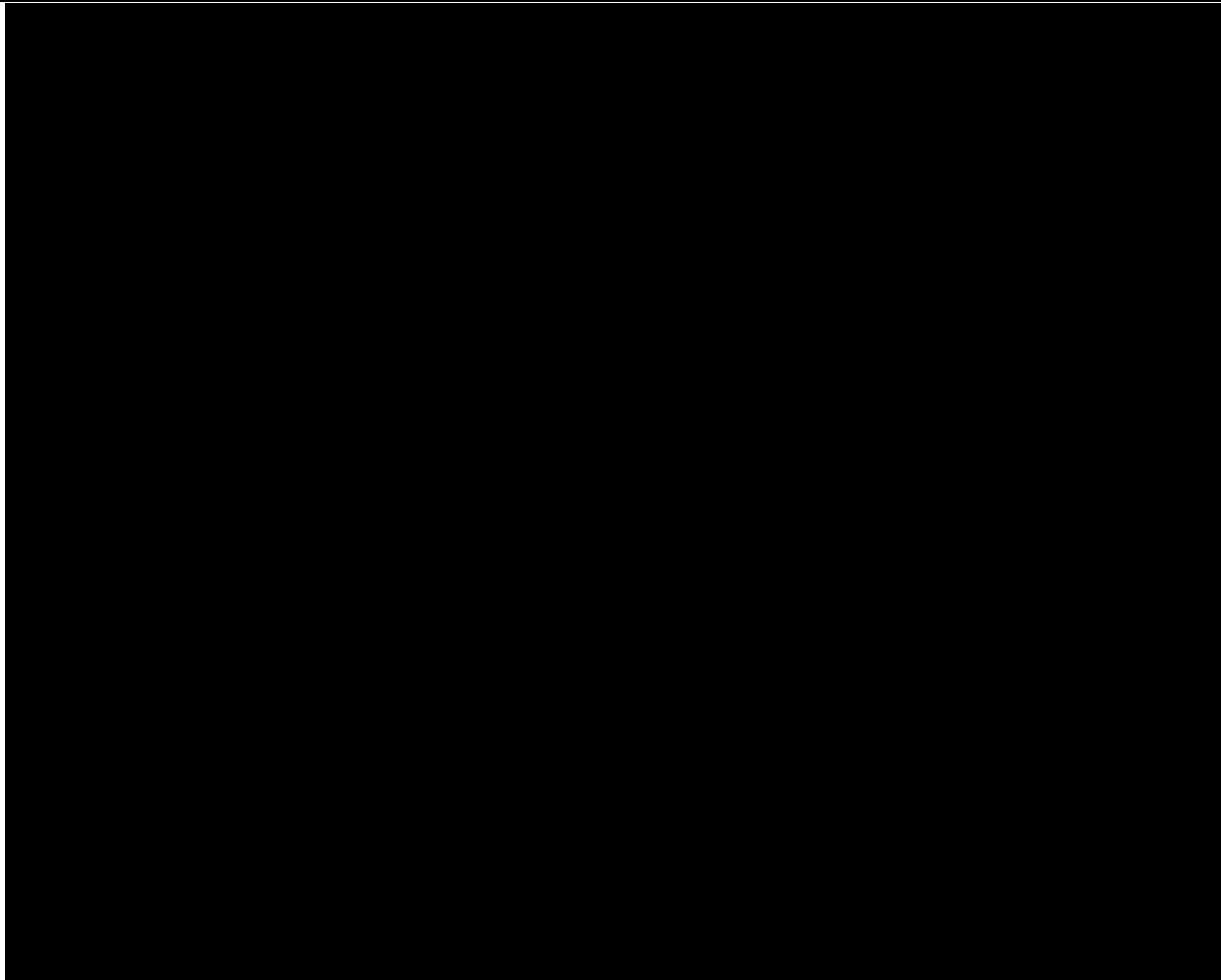
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EXHIBIT A1 - U.S. PATENT NO. 5,904,172 VERSUS AMERICAN NATIONAL MANUFACTURING ACCUSED PRODUCTS

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <div data-bbox="695 342 1999 574" style="background-color: black; width: 100%; height: 143px; margin-bottom: 10px;"></div> <p>This limitation may further implicate other electronics, software, firmware, and/or source code of the Accused Products. Additional Source Code for the Accused Products may further show how this claim limitation is met. To resolve a dispute regarding Plaintiff’s Notice of Inspection for Source Code, the parties have agreed that Plaintiff shall be allowed to inspect remaining Source Code for the Accused Products on mutually agreeable date(s), after which Plaintiff shall supplement its infringement contentions, pursuant to an agreed-upon timeline and without opposition, using the information learned during the inspection.</p> <p>Even under Defendants’ construction from the ITC proceeding, where a “valve enclosure assembly” means “an enclosure and a rear cover defining an internal, pressurized air chamber enclosing a valve,” ANM’s Gen 3 or Gen X air controllers meet this claim limitation.</p> <p>As seen in the photographs below, the enclosure of the Gen 3 Arco’s valve enclosure assembly is comprised of an enclosure and a rear cover.</p> |

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

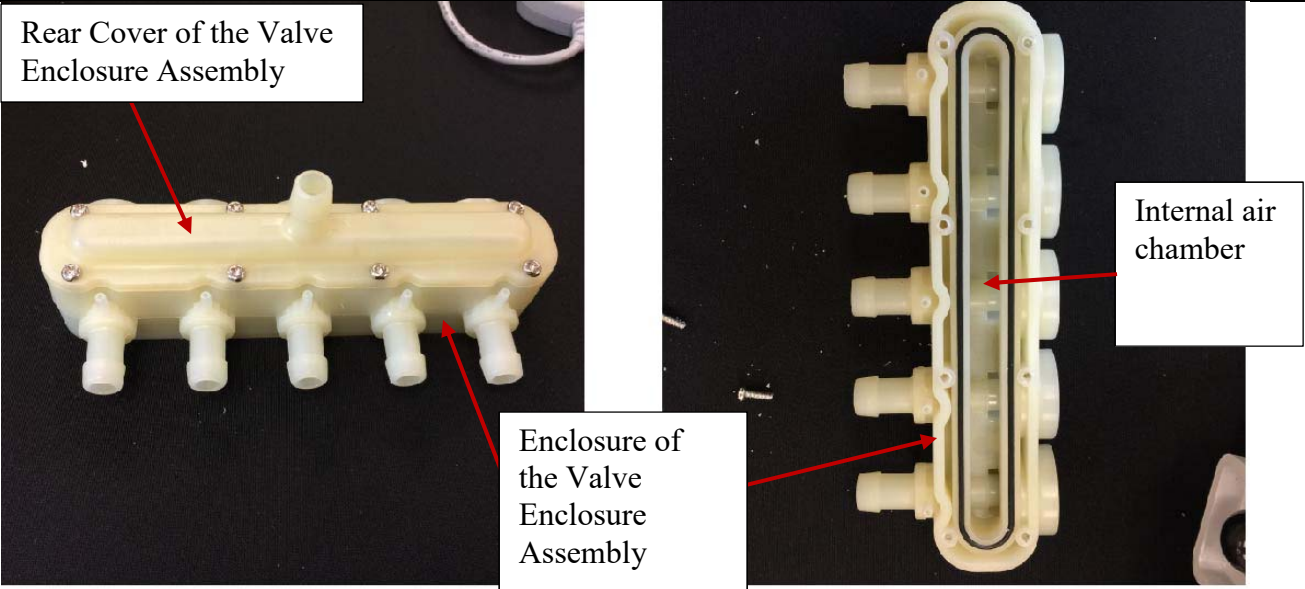
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="682 349 1039 430">Rear Cover of the Valve Enclosure Assembly</p> <p data-bbox="1176 747 1417 917">Enclosure of the Valve Enclosure Assembly</p> <p data-bbox="1785 519 1974 673">Internal air chamber</p> <p data-bbox="892 933 1039 966">Enclosure</p> <p data-bbox="1375 933 1921 966">Enclosure with Rear Cover Removed</p> <p data-bbox="682 1031 1081 1063">(Photograph of the Gen 3 Arco)</p> <p data-bbox="682 1120 1953 1185">Furthermore, as seen in the photograph below showing a side perspective view of the Gen 3 Arco's enclosure, the Gen 3 Arco the internal chamber is shown enclosing a valve.</p> |

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

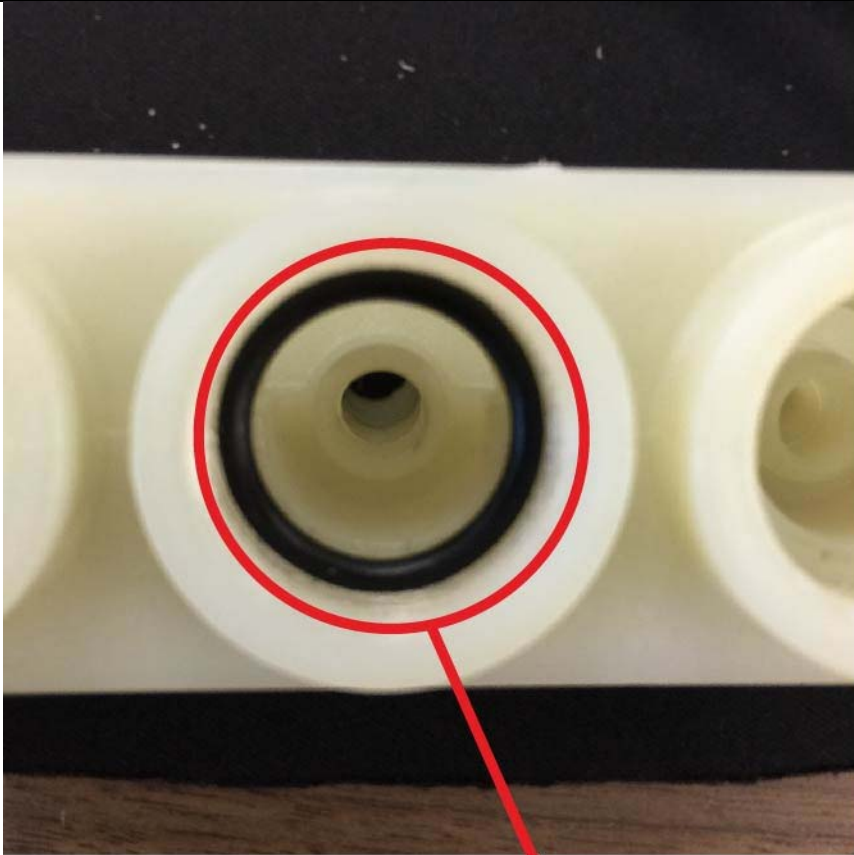
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="829 1289 1656 1360">Perspective view of the internal chamber enclosing a valve</p> <p data-bbox="680 1370 1041 1403">(Photograph of Gen 3 Arco)</p> |

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

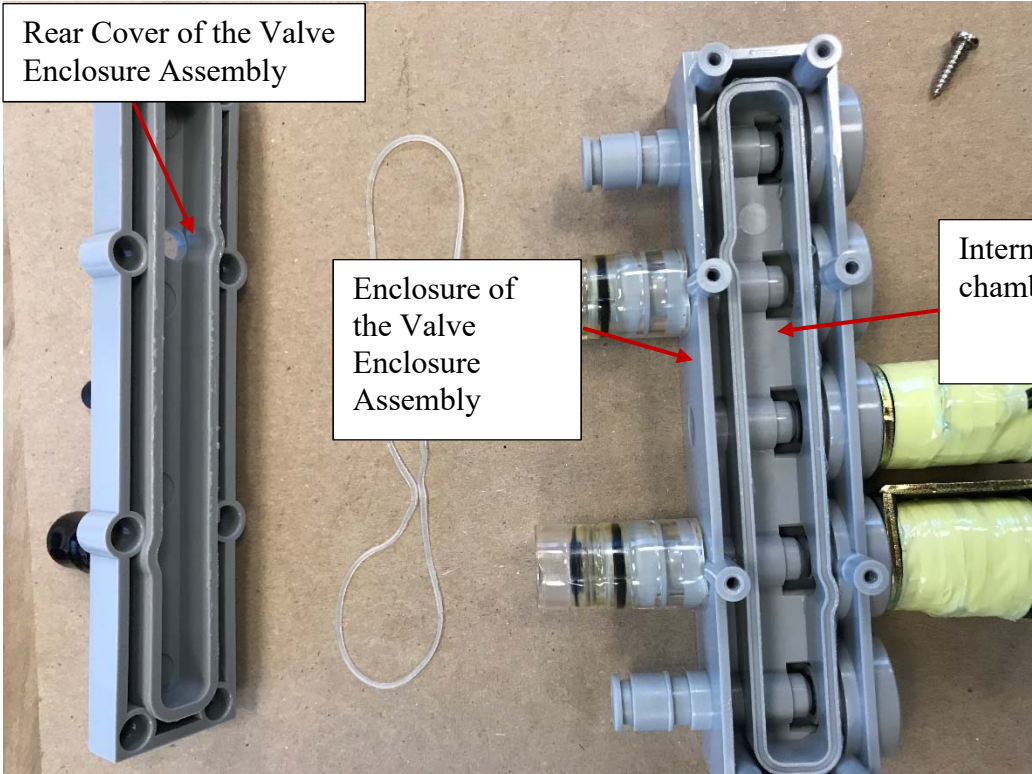
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>As seen in the photographs below, the enclosure of the Gen X's valve enclosure assembly is comprised of an enclosure and a rear cover.</p>  <p>(Photograph of the Gen 3 Arco)</p> <p>Furthermore, as seen in the photograph below showing a side perspective view of the Gen 3 Arco's enclosure, the Gen 3 Arco the internal chamber is shown enclosing a valve.</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1444 743 1692 951">Internal Chamber Enclosing a Valve</p> <p data-bbox="680 1289 1041 1321">(Photograph of Gen 3 Arco)</p> |

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

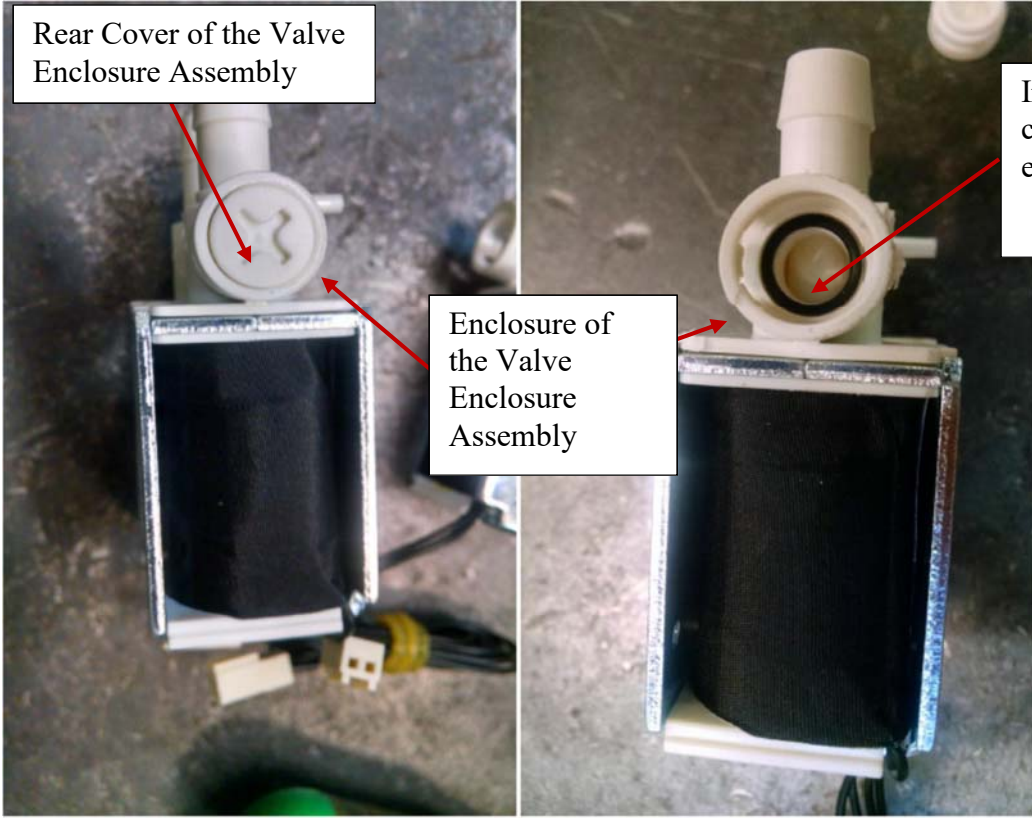
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>As seen in the photographs below, the enclosure of the Gen 3 Koge's valve enclosure assembly is comprised of an enclosure and a rear cover. The valve seal is contained within the enclosure, which shows how the enclosure and rear cover define an internal air chamber enclosing a valve.</p>  <p data-bbox="688 461 1052 553">Rear Cover of the Valve Enclosure Assembly</p> <p data-bbox="1104 748 1350 927">Enclosure of the Valve Enclosure Assembly</p> <p data-bbox="1675 516 1948 711">Internal air chamber enclosing a valve</p> <p data-bbox="848 1279 1024 1321">Enclosure</p> <p data-bbox="1220 1279 1688 1365">Enclosure with Rear Cover Removed</p> <p data-bbox="680 1382 1094 1414">(Photograph of the Gen 3 Koge)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|--|---|
| <p>[16.1] an enclosure defining a substantially fluidly sealed air chamber and having at least one air inlet to the air chamber being fluidly coupled to the pump, the enclosure being formed of an enclosure portion and a rear cover portion, a flexible seal being compressively interposed between the enclosure portion and a rear cover portion to effect a substantially fluid tight seal therebetween;</p> | <p>Under the plain and ordinary meaning of the claim terms in light of the specification, the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers include an enclosure defining a substantially fluidly sealed air chamber and having at least one air inlet to the air chamber being fluidly coupled to the pump, the enclosure being formed of an enclosure portion and a rear cover portion, a flexible seal being compressively interposed between the enclosure portion and a rear cover portion to effect a substantially fluid tight seal therebetween.</p> <p>The Accused Products having a Gen 3 Arco air controller include a valve enclosure assembly comprised, in part, of an enclosure defining a substantially fluidly sealed air chamber that has at least one air inlet to the air chamber and which is fluidly coupled to the pump.</p> |

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

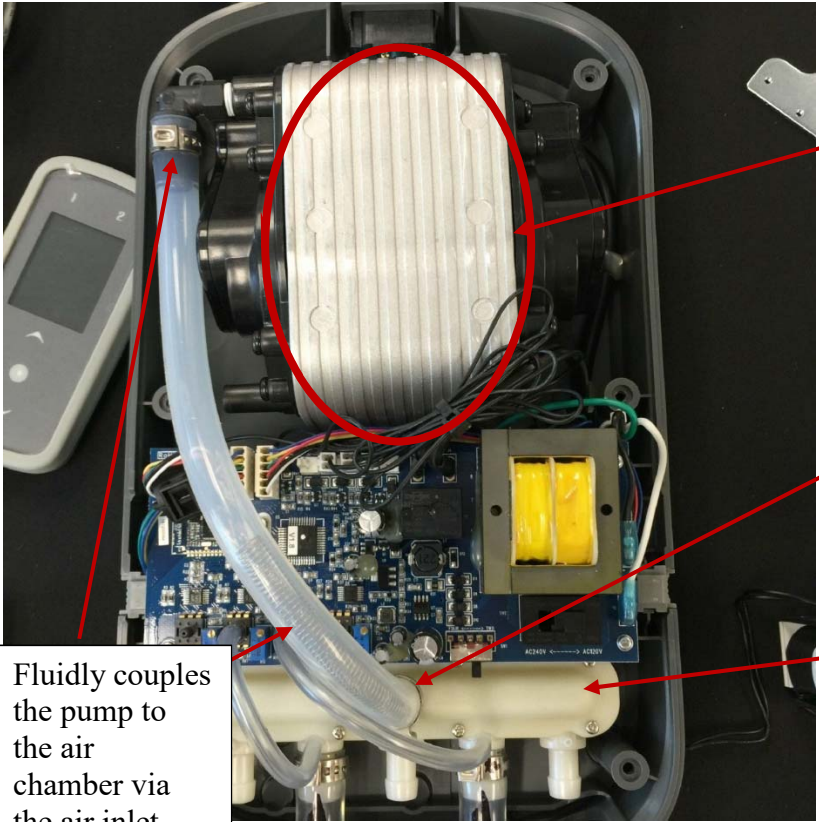
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>Gen 3 Arco:</p>  <p>Pump</p> <p>Air Inlet to substantially fluidly sealed air chamber</p> <p>Enclosure, defining a substantially fluidly sealed air chamber (internal)</p> <p>Fluidly couples the pump to the air chamber via the air inlet</p> <p>(Photograph of Gen 3 Arco)</p> <p>As seen in the photograph above, tubing connects the pump to the enclosure and to the air inlet to the air chamber of the enclosure. That is, the air inlet to the air chamber is fluidly coupled to the pump.</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1241 813 1419 862">Air Inlet</p> <p data-bbox="1539 521 1906 711">Enclosure, which defines a Substantially Fluidly Sealed Air Chamber</p> <p data-bbox="680 1089 1041 1122">(Photograph of Gen 3 Arco)</p> |

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

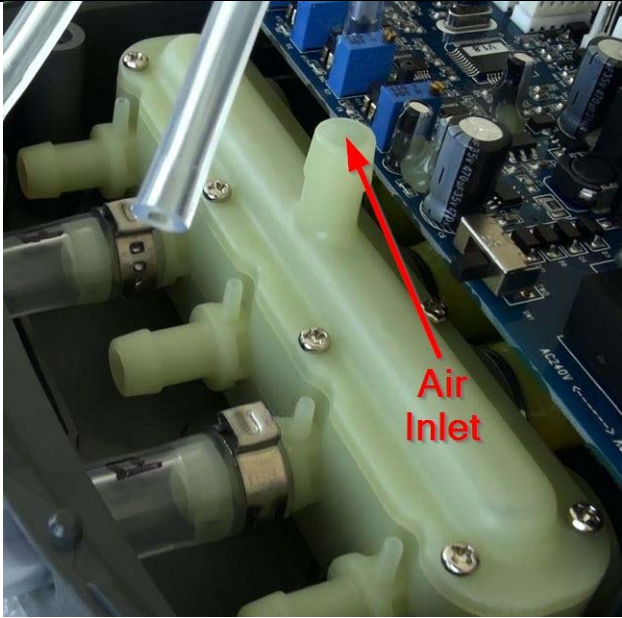
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photograph of Gen 3 Arco)</p> <p>As further seen from the photographs below, the enclosure defines an air chamber. The air chamber includes one or more O-rings, which assist in substantially fluidly sealing the air chamber.</p> |

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

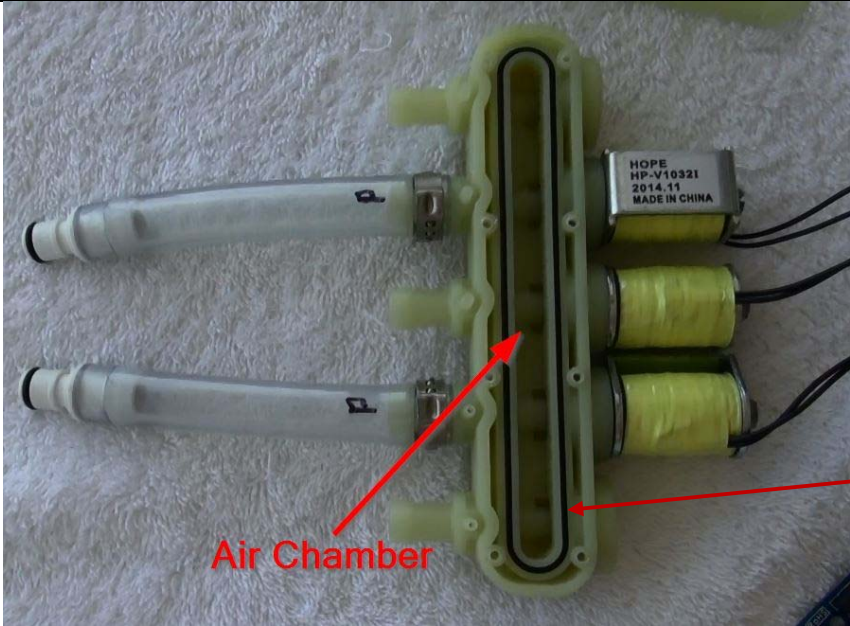
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="680 971 1871 1040">(Photograph of Gen 3 Arco's enclosure (depicted with the rear-cover removed for illustrative purposes).)</p> |

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

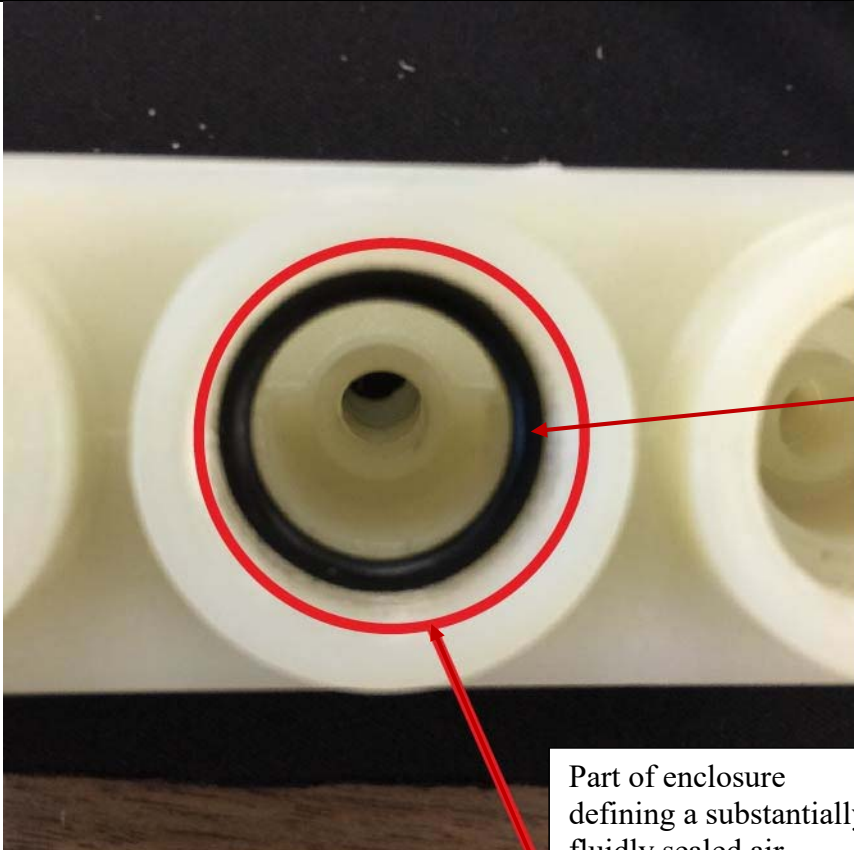
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>O-ring, which assists in substantially fluidly sealing the air chamber</p> <p>Part of enclosure defining a substantially fluidly sealed air chamber</p> <p>(Photograph of Gen 3 Arco's enclosure (depicted with solenoids removed).)</p> |

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

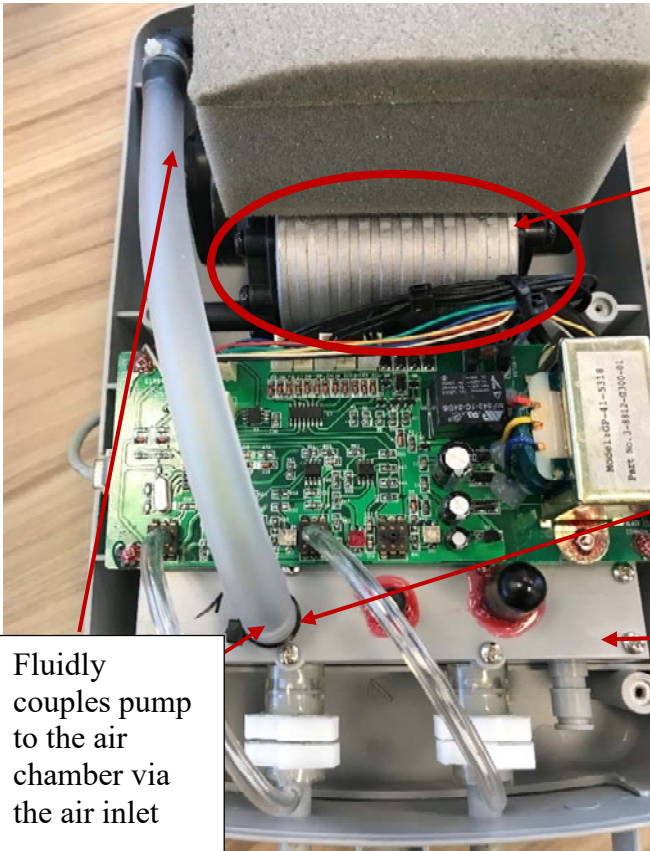
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The Accused Products having a Gen X air controller include a valve enclosure assembly comprised, in part, of an enclosure defining a substantially fluidly sealed air chamber that has at least one air inlet to the air chamber and which is fluidly coupled to the pump.</p> <p>Gen X:</p>  <p>(Photograph of Gen X)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>As seen in the photograph above, tubing connects the pump to the enclosure and to the air inlet to the air chamber of the enclosure. That is, the air inlet to the air chamber is fluidly coupled to the pump.</p> <div data-bbox="676 462 1251 1226" data-label="Image"> </div> <div data-bbox="1419 500 1780 690" data-label="Text"> <p>Air inlet to substantially fluidly sealed air chamber of the enclosure</p> </div> <p>(Photograph of Gen X)</p> <p>As further seen from the photographs below, the enclosure defines an air chamber. The air chamber includes one or more O-rings, which assist in substantially fluidly sealing the air chamber.</p> |

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

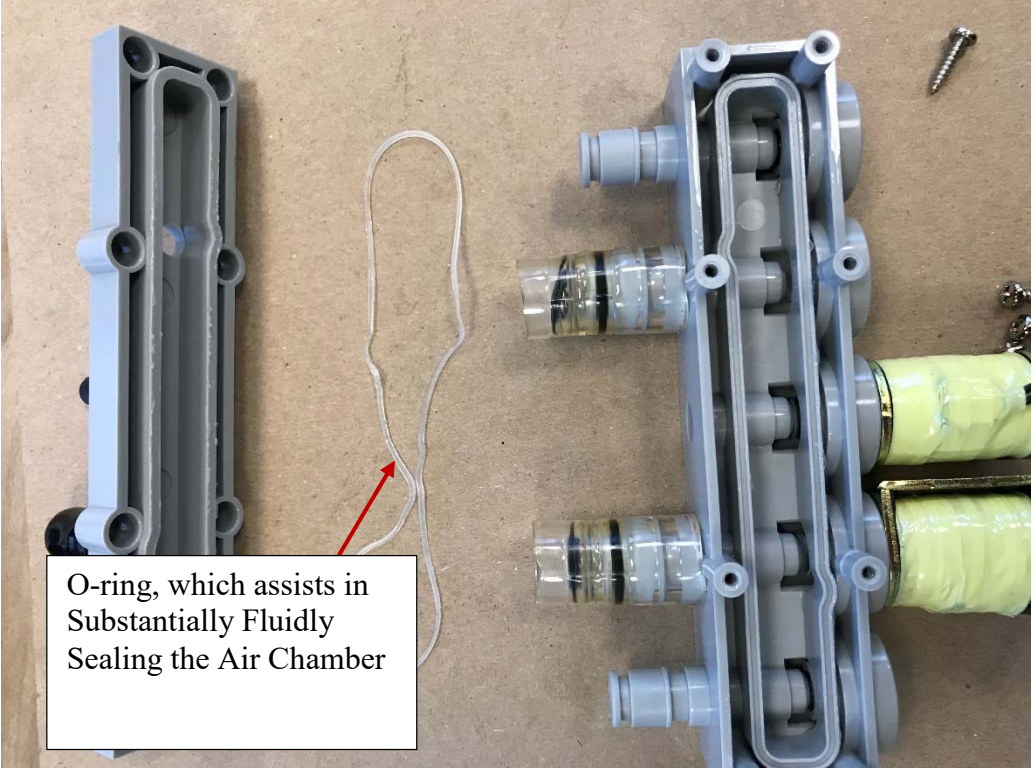
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="730 893 1096 1084">O-ring, which assists in Substantially Fluidly Sealing the Air Chamber</p> <p data-bbox="682 1112 1869 1185">(Photograph of Gen X's enclosure (depicted with the rear-cover and O-ring disassembled for illustrative purposes))</p> |

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

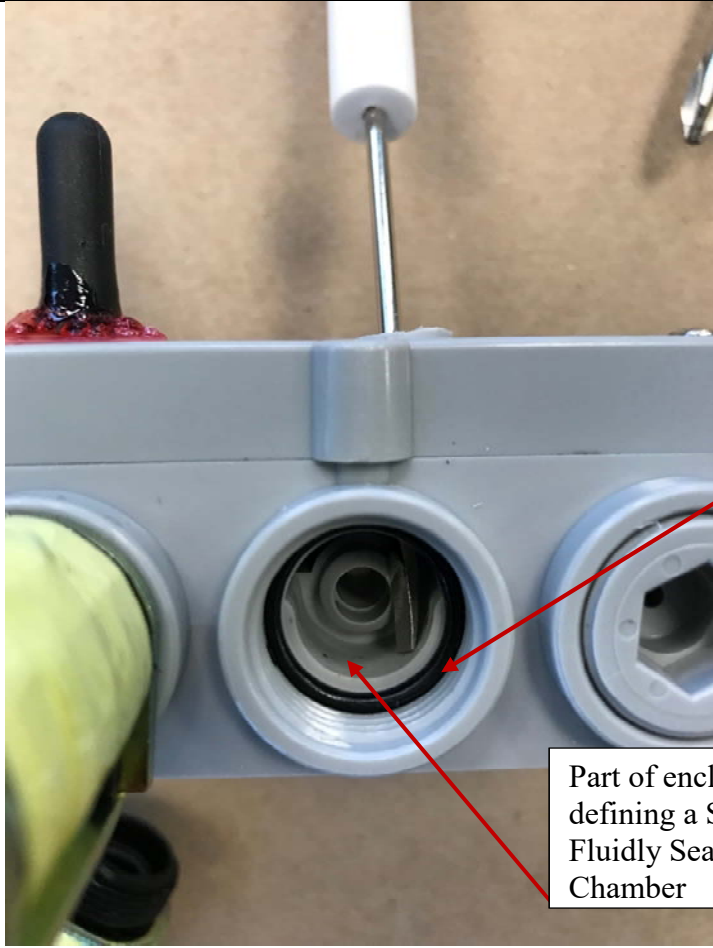
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1549 638 1919 829">O-ring, which assists in Substantially Fluidly Sealing the Air Chamber</p> <p data-bbox="1226 1081 1591 1239">Part of enclosure defining a Substantially Fluidly Sealed Air Chamber</p> <p data-bbox="680 1328 1598 1365">(Photograph of Gen X's enclosure (depicted with a solenoid removed).)</p> |

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

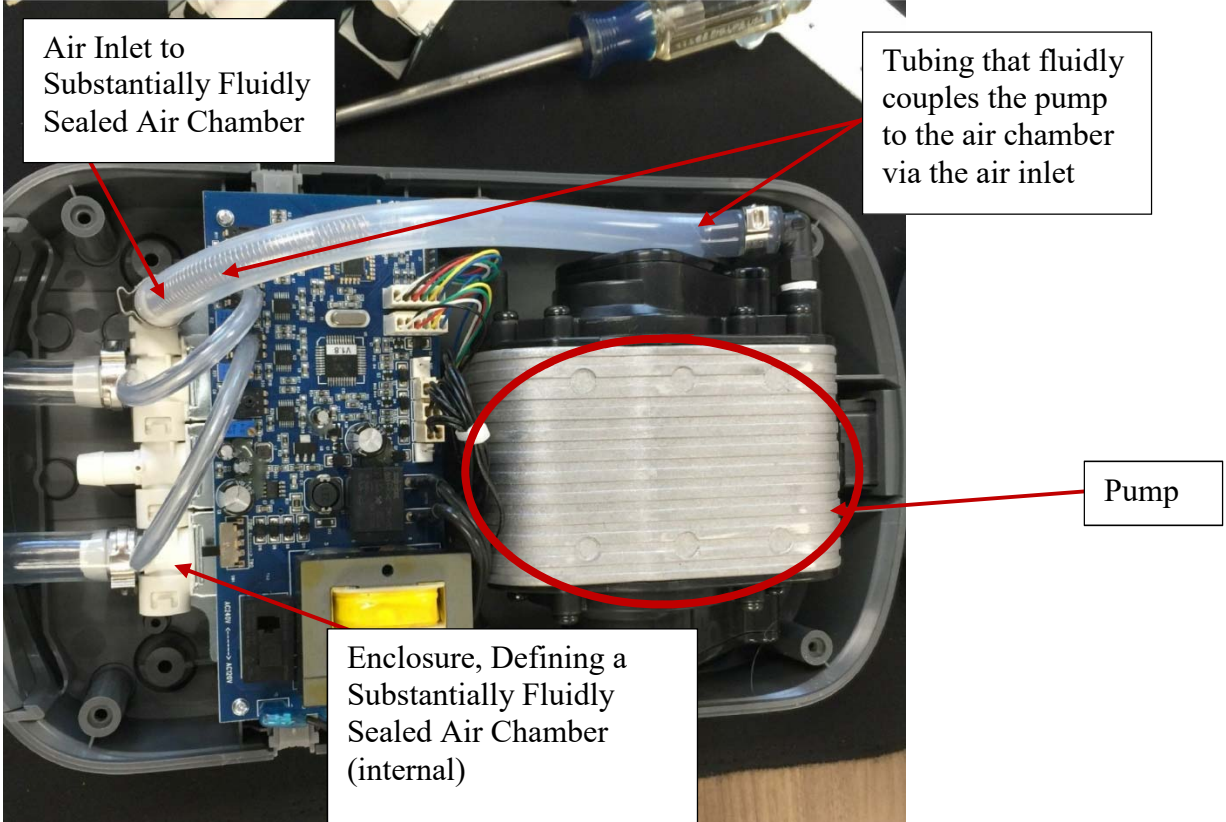
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The Accused Products having a Gen 3 Koge air controller include an enclosure defining a substantially fluidly sealed air chamber that has at least one air inlet to the air chamber, which is fluidly coupled to the pump.</p> <p>Gen 3 Koge:</p>  <p>(Photograph of Gen 3 Koge)</p> |

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

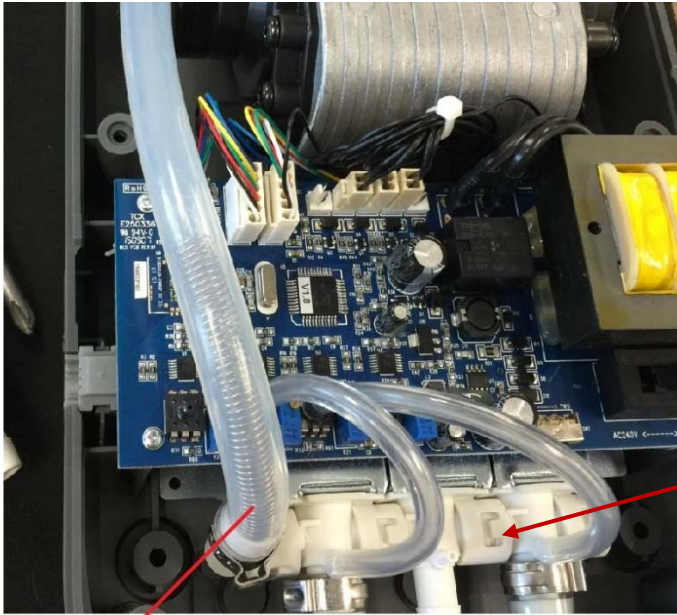
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>As seen in the photograph above, tubing connects the pump to the enclosure and to the air inlet to the air chamber of the enclosure. That is, the air inlet to the air chamber is fluidly coupled to the pump.</p>  <div data-bbox="1388 760 1759 954" style="border: 1px solid black; padding: 5px; margin-left: 200px;"> <p>Enclosure, which defines a Substantially Fluidly Sealed Air Chamber</p> </div> <p style="color: red; margin-left: 100px;">Inlet to substantially fluidly sealed enclosure</p> <p>(Photograph of Gen 3 Koge)</p> <p>As further seen from the photographs below, the enclosure defines an air chamber. The air chamber includes one or more interlocking connectors, which assist in substantially fluidly sealing the air chamber.</p> |

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

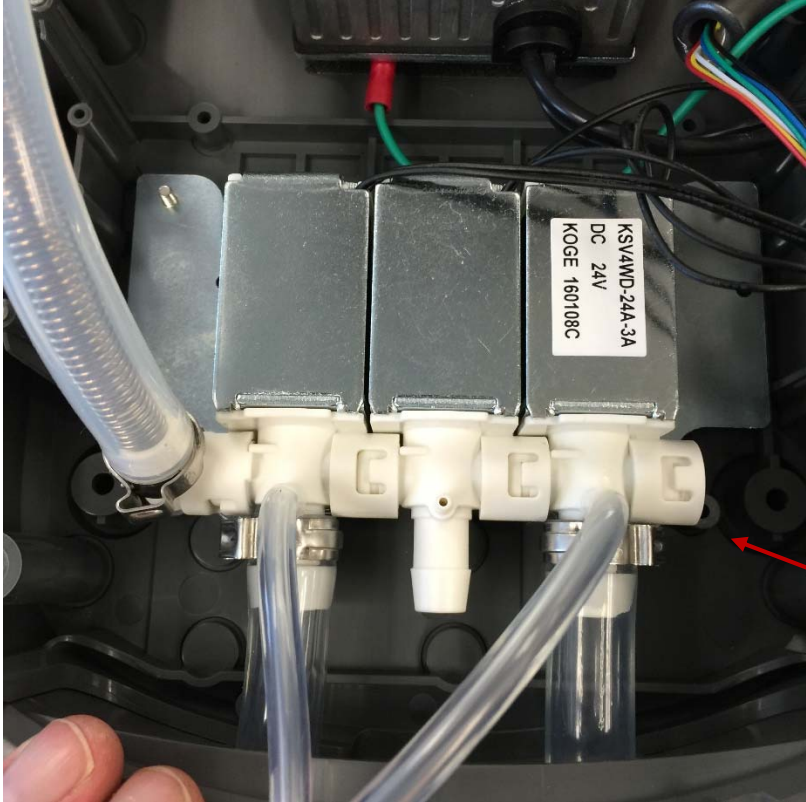
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1570 870 1934 1060">Enclosure defining a substantially fluidly sealed air chamber</p> <p data-bbox="680 1154 1045 1190">(Photograph of Gen 3 Koge)</p> |

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

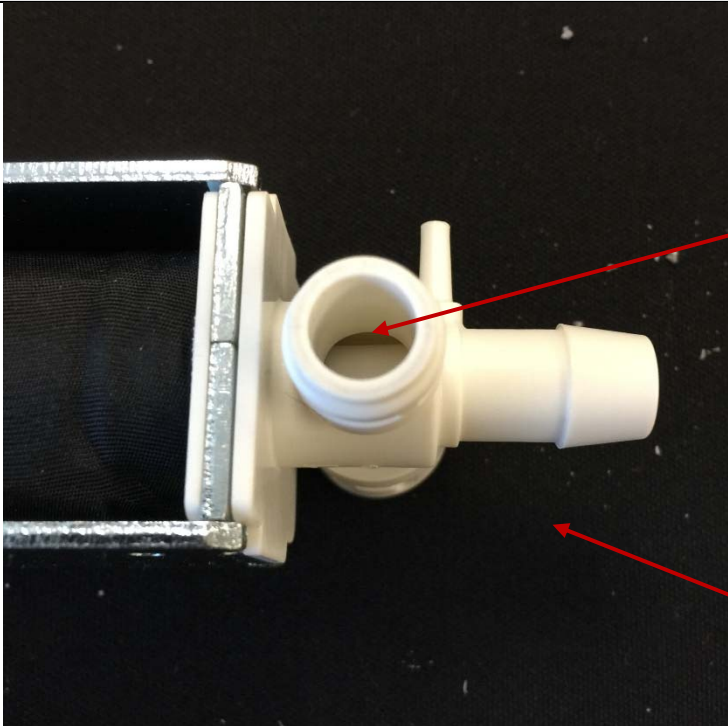
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1438 474 1818 620">Substantially Fluidly Sealed Air Chamber</p> <p data-bbox="1526 902 1787 1024">Enclosure</p> <p data-bbox="680 1068 1902 1105">(Photograph of Gen 3 Koge's enclosure (depicted detached from other enclosure components).)</p> <p data-bbox="680 1203 1997 1414">When the Gen 3 and Gen X air controllers inflate the one or more air bladders, the pump, tubing that connects the pump to the air inlet, air chamber, and tubing connecting the air chamber to the one or more air bladders creates a substantially fluidly sealed environment substantially fluidly sealing the air chamber. That is, the enclosure contains several fluid tight seals and the tubing connecting the air bladders and pump to the enclosure creates a fluidly sealed environment such that the air chamber defined by the enclosure is substantially fluidly sealed. To the extent this limitation is not literally</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>present the limitation is met under the doctrine of equivalents because the substantially fluidly sealed environment performs substantially the same function as a substantially sealed air chamber in substantially the same way and to obtain the substantially same result. Accordingly, the air chamber defined by the enclosure meets the substantially fluidly sealed limitation.</p> <p>The Accused Products having a Gen 3 Arco air controller further include an enclosure being formed of an enclosure portion and a rear cover portion, a flexible seal being compressively interposed between the enclosure portion and a rear cover portion to effect a substantially fluid tight seal therebetween.</p> <p>As seen in the photographs below, the Gen 3 Arco's enclosure of the valve enclosure assembly is comprised of an enclosure portion and a rear cover portion. Furthermore, a flexible seal is compressively interposed between the enclosure portion and the rear cover portion, thereby creating a substantially fluid tight seal between the enclosure portion and the rear cover portion.</p> |

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

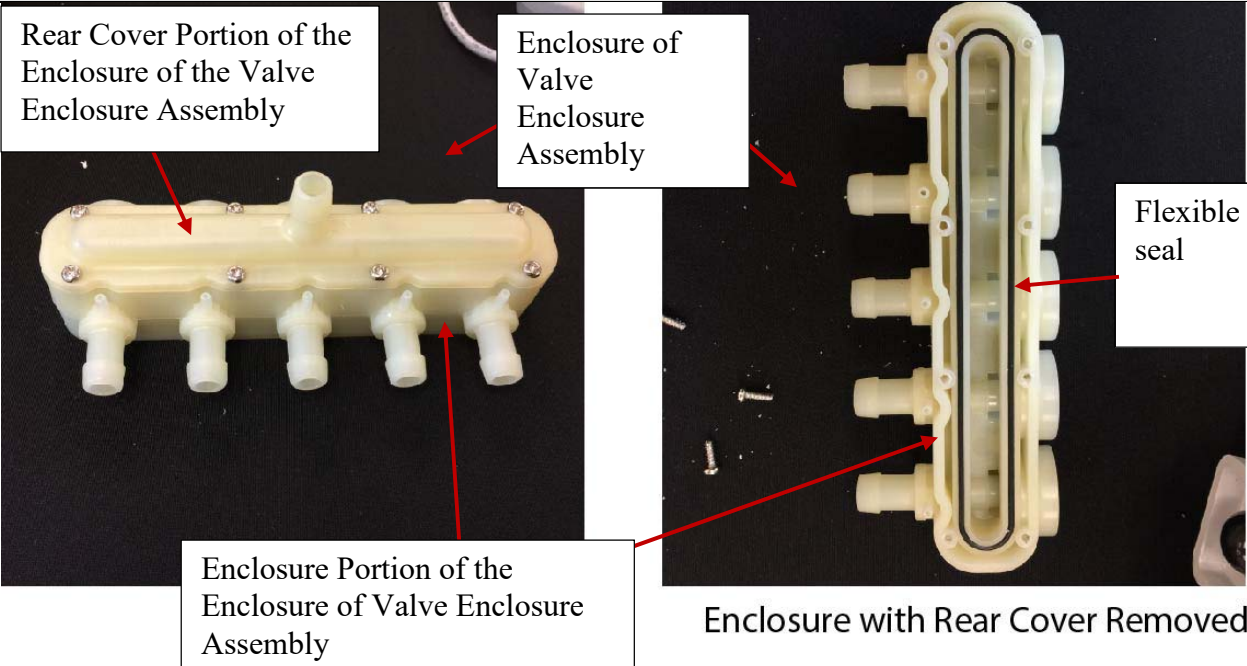
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photograph of the Gen 3 Arco)</p> <p>The Accused Products having a Gen X air controller further include an enclosure being formed of an enclosure portion and a rear cover portion, a flexible seal being compressively interposed between the enclosure portion and a rear cover portion to effect a substantially fluid tight seal therebetween.</p> <p>As seen in the photographs below, the Gen X's enclosure of the valve enclosure assembly is comprised of an enclosure portion and a rear cover portion. Furthermore, a flexible seal is compressively interposed between the enclosure portion and the rear cover portion, thereby creating a substantially fluid tight seal between the enclosure portion and the rear cover portion.</p> |

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

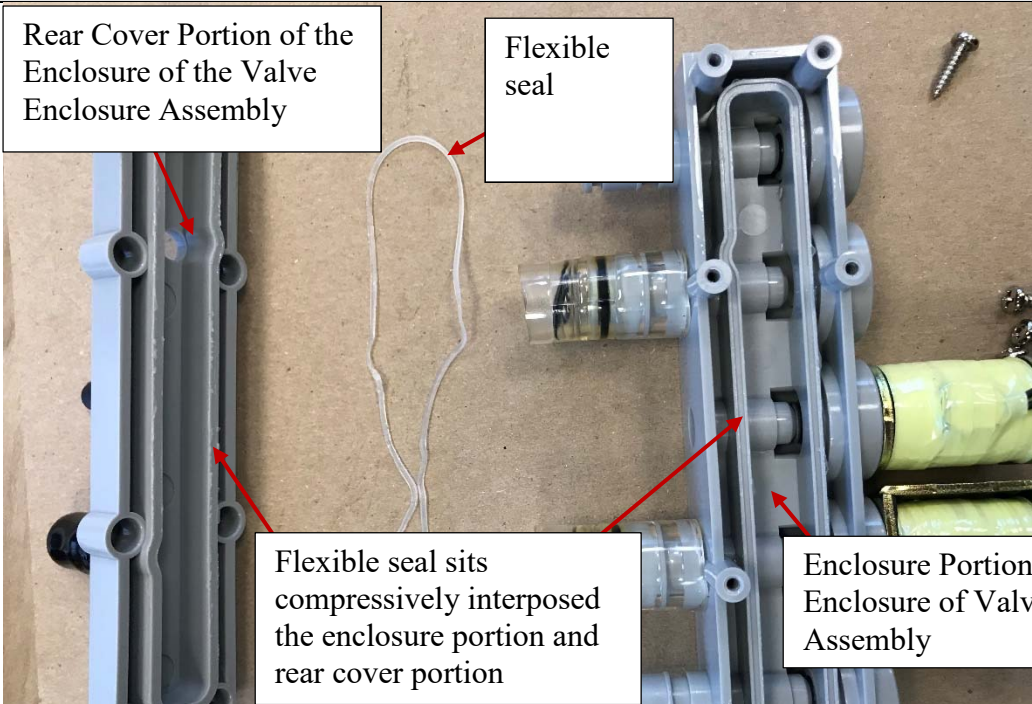
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photograph of the Gen X)</p> <p>As seen in the photographs below, the Gen 3 Koge's enclosure of the valve enclosure assembly is comprised of an enclosure portion and a rear cover portion. Furthermore, a flexible seal is compressively interposed between the enclosure portion and the rear cover portion, thereby creating a substantially fluid tight seal between the enclosure portion and the rear cover portion.</p> |

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

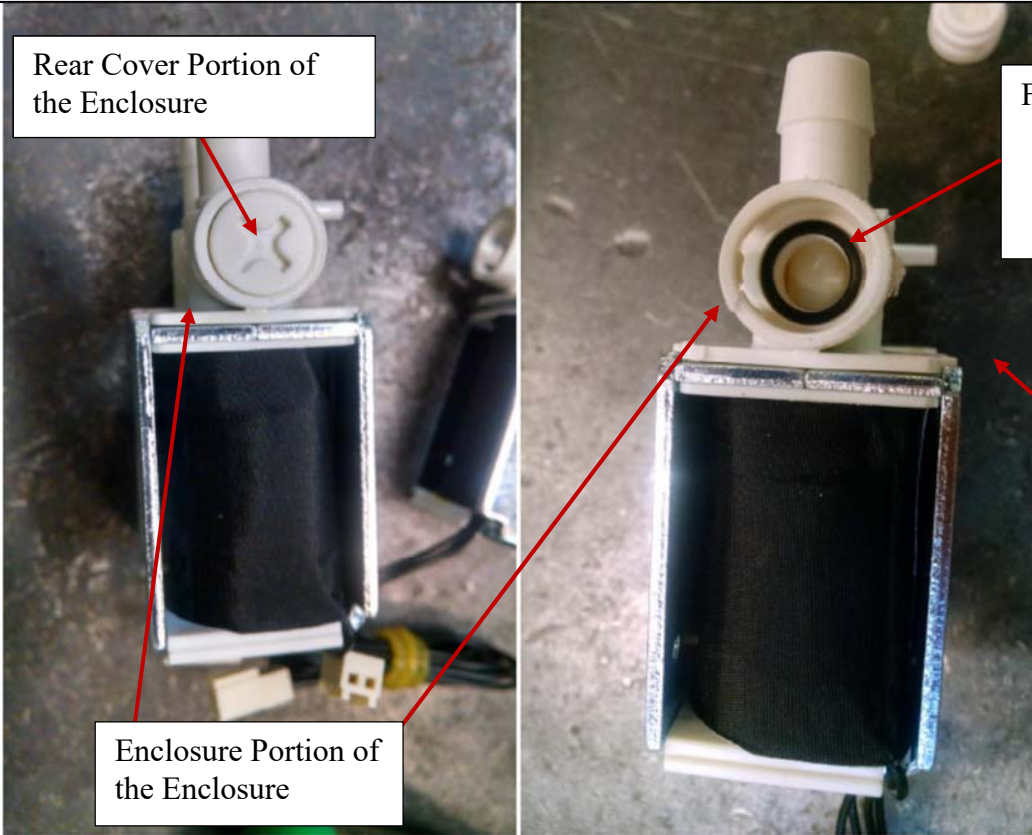
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---|---|
| |  <p data-bbox="693 373 1050 470">Rear Cover Portion of the Enclosure</p> <p data-bbox="777 1055 1071 1153">Enclosure Portion of the Enclosure</p> <p data-bbox="1680 397 1953 592">Flexible Seal</p> <p data-bbox="1722 690 1984 909">Enclosure of Valve Enclosure Assembly with Rear Cover Portion Removed</p> <p data-bbox="680 1177 1092 1209">(Photograph of the Gen 3 Koge)</p> |
| <p data-bbox="105 1274 651 1412">[16.2] at least one valve operably coupled to the enclosure being in selective fluid communication with the air chamber and being in fluid communication with the at</p> | <p data-bbox="680 1274 1984 1412">Under the plain and ordinary meaning of the claim terms in light of the specification, the Gen 3 Arco, Gen X, and Gen 3 Koge Air Controllers include at least one valve operably coupled to the enclosure being in selective fluid communication with the air chamber and being in fluid communication with the at least one air bladder for selectively fluidly coupling the air chamber to at least one air bladder.</p> |

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

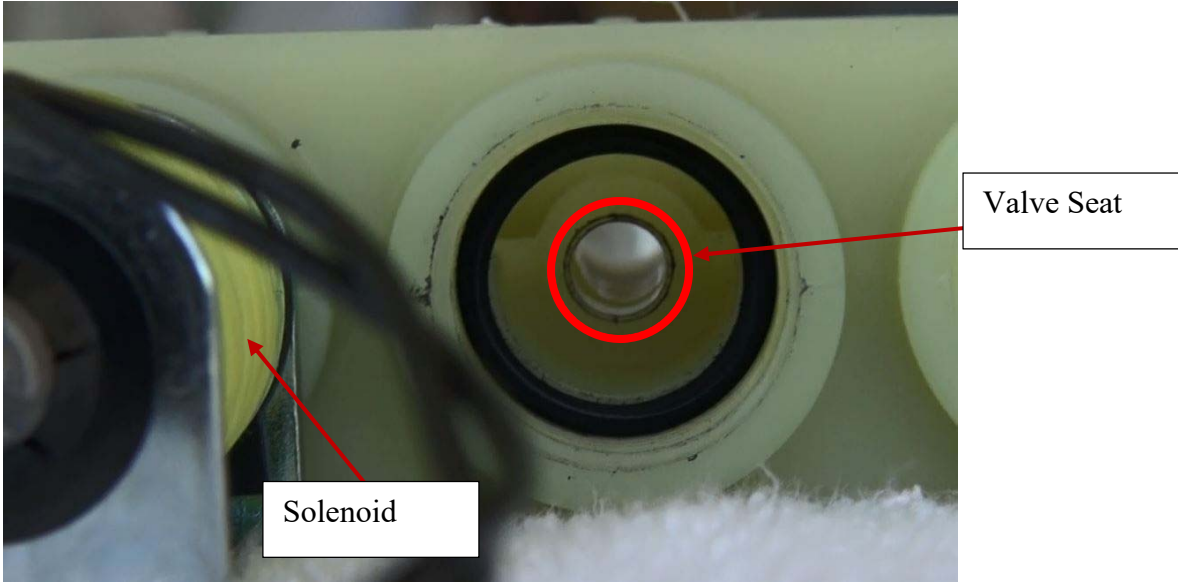
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|--|--|
| <p>least one air bladder for selectively fluidly coupling the air chamber to at least one air bladder; and</p> | <p>The Gen 3 Arco air controllers include at least one valve operably coupled to the enclosure and capable of being in selective fluid communication with the air chamber. Specifically, the valve enclosure assembly of the Gen 3 Arco includes a plurality of valves operably coupled to the enclosure. The valves are capable of being in fluid communication with the at least one air bladder and are selectable or in selective fluid communication with the air chamber. The valves are configured to be selectable/are capable of the selective fluid coupling of the air chamber to at least one air bladder. The valve is created by a valve seat and the plunger of a solenoid. The valve seat is part of the mold that creates the enclosure of the valve enclosure assembly and is therefore operably coupled to the enclosure. The plunger of the solenoid is inserted into the enclosure such that the plunger is capable of contacting the valve seat to close the valve, and is thus also operably coupled to the enclosure.</p>  <p>(Photograph of Gen 3 Arco's valve enclosure assembly with a solenoid removed)</p> |

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

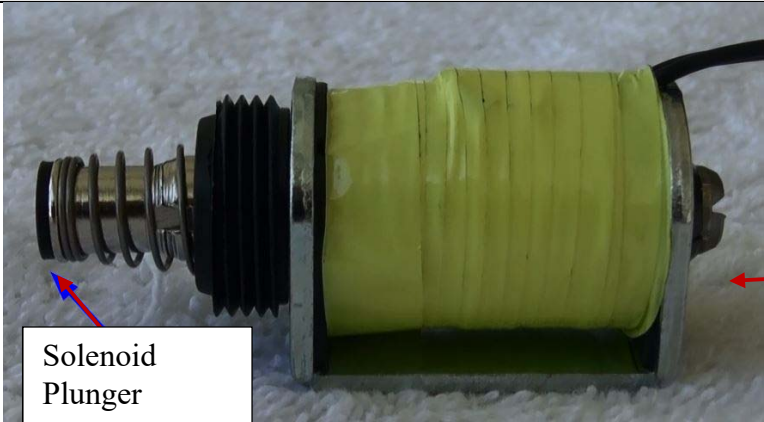
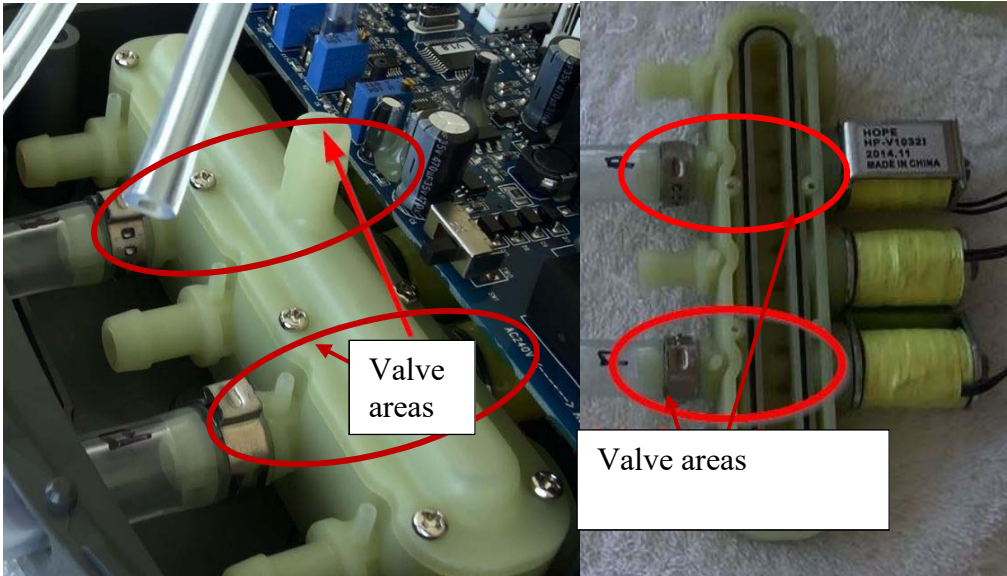
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="680 763 1081 803">There are a plurality of valves:</p>  <p data-bbox="680 1388 1060 1421">(Photographs of Gen 3 Arco)</p> |

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

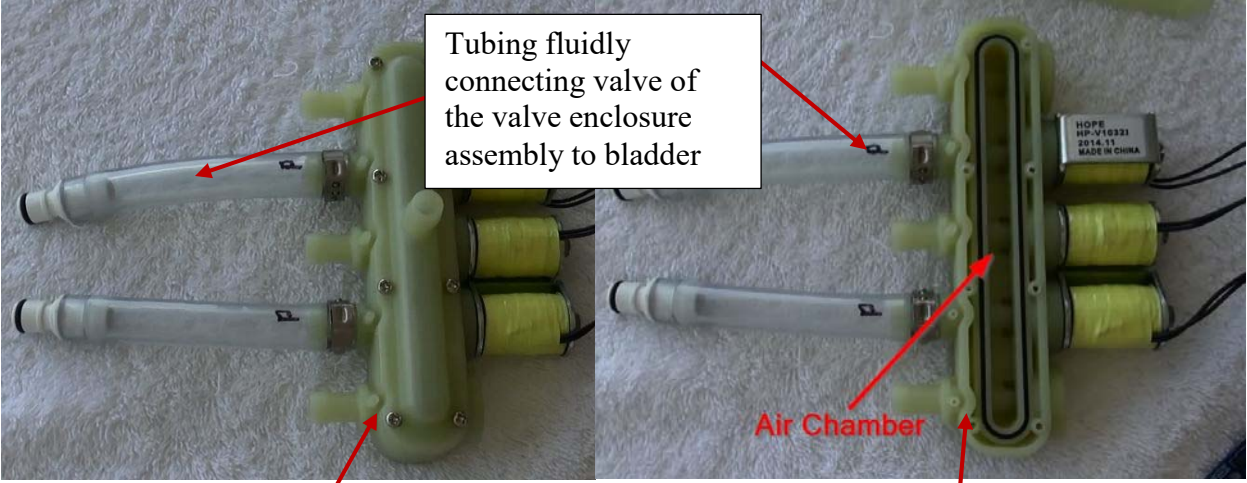
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The valve is fluidly coupled to the bladder of an air inflatable mattress. For example, as seen in the photographs below, tubing fluidly couples the enclosure of the valve enclosure assembly to one or more bladders. Accordingly, the valve is capable of being in fluid communication with the at least one air bladder.</p>  <p style="text-align: center;">Tubing fluidly connecting valve of the valve enclosure assembly to bladder</p> <p style="text-align: right;">Air Chamber</p> <div style="display: flex; justify-content: space-around;"> <div data-bbox="682 998 1260 1063" style="border: 1px solid black; padding: 5px;"> <p>Enclosure of Valve Enclosure Assembly (Photographs of Gen 3 Arco)</p> </div> <div data-bbox="1501 998 1890 1128" style="border: 1px solid black; padding: 5px;"> <p>Enclosure of Valve Enclosure Assembly (cover removed)</p> </div> </div> |

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

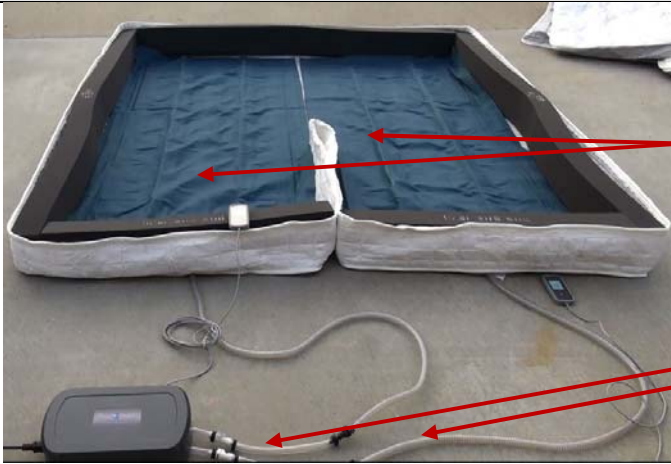
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1381 415 1652 526">Bladder of an air inflatable mattress</p> <p data-bbox="1402 597 1692 764">Tubing fluidly connecting valve enclosure assembly to bladder</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="693 397 976 560">Tubing fluidly connecting valve enclosure assembly to bladder</p> <p data-bbox="1627 381 1942 560">Bladders of Air Inflatable Mattress, which are inflatable by compressed air</p> <p data-bbox="1564 755 1879 901">Air Controller containing the Valve Enclosure Assembly</p> <p data-bbox="682 1006 1249 1047">(Photograph of medical air mattress system)</p> <p data-bbox="682 1096 1984 1380">When the valve is open, air (represented by blue arrows) can pass from the substantially fluidly sealed air chamber of the enclosure of the valve enclosure assembly through the valve and tubing fluidly connecting the valve enclosure assembly to the bladder of the air inflatable mattress. Thus, when open, the valve allows for the fluidly coupling of the air chamber to at least one air bladder. However, this fluid coupling is selective or selectable because when the valve is closed, air cannot pass from the air chamber through the valve. Accordingly, the valve is capable of being in selective fluid communication with the air chamber. Thus, when closed, the air chamber and the air bladder are not fluidly coupled.</p> |

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

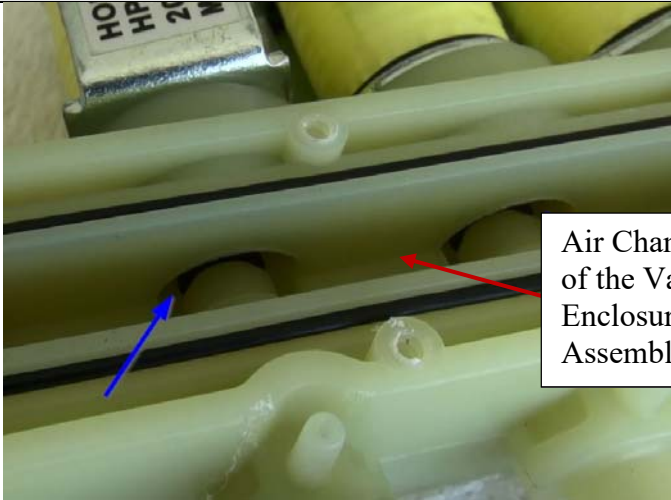
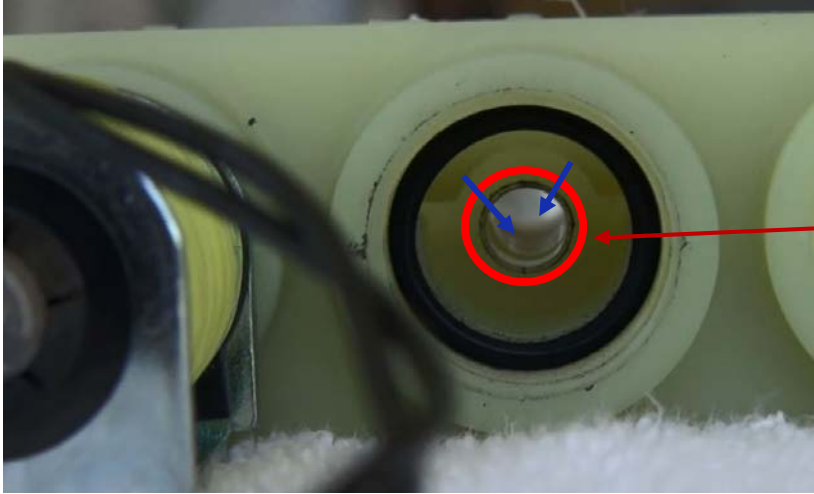
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="1220 548 1444 719">Air Chamber of the Valve Enclosure Assembly</p> <p data-bbox="680 846 1041 878">(Photograph of Gen 3 Arco)</p>  <p data-bbox="1640 1057 1850 1133">Valve Seat</p> <p data-bbox="680 1385 1041 1417">(Photograph of Gen 3 Arco)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The Accused Products having a Gen X air controller include at least one valve operably coupled to the enclosure and capable of being in selective fluid communication with the air chamber. Specifically, the valve enclosure assembly of the Gen X includes a plurality of valves operably coupled to the enclosure. The valves are capable of being in fluid communication with the at least one air bladder and are selectable or in selective fluid communication with the air chamber. The valves are configured to be selectable/are capable of the selective fluid coupling of the air chamber to at least one air bladder. The valve is created by a valve seat and the plunger of a solenoid. The valve seat is part of the mold that creates the enclosure of the valve enclosure assembly and is therefore operably coupled to the enclosure. The plunger of the solenoid is inserted into the enclosure such that the plunger is capable of contacting the valve seat to close the valve, and is thus also operably coupled to the enclosure.</p> |

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

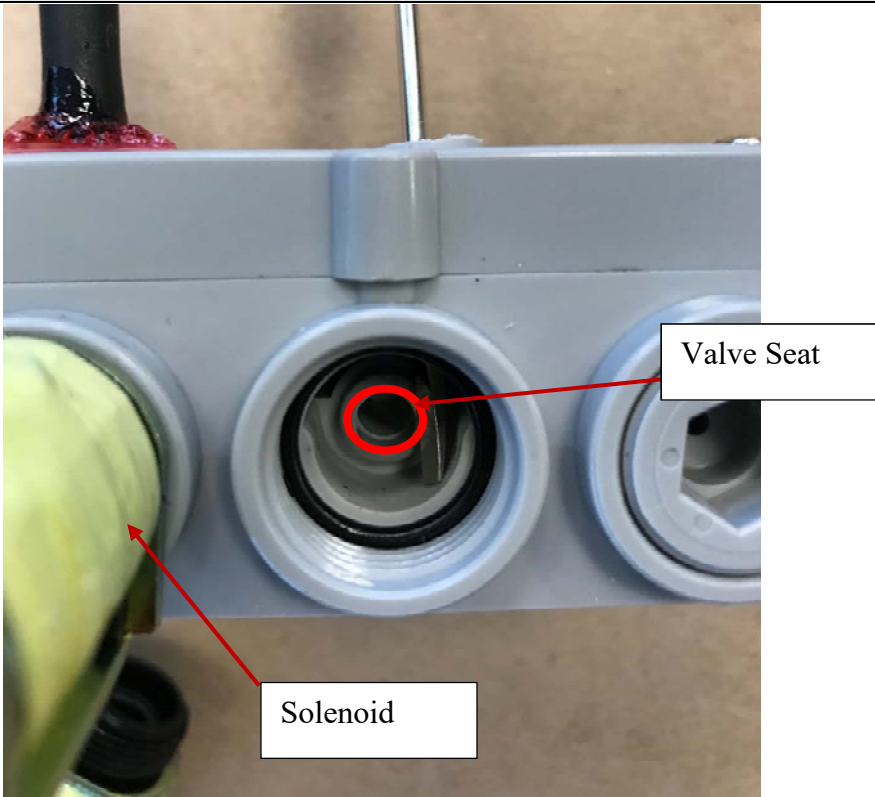
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>(Photograph of Gen X's valve enclosure assembly with a solenoid removed)</p> |

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

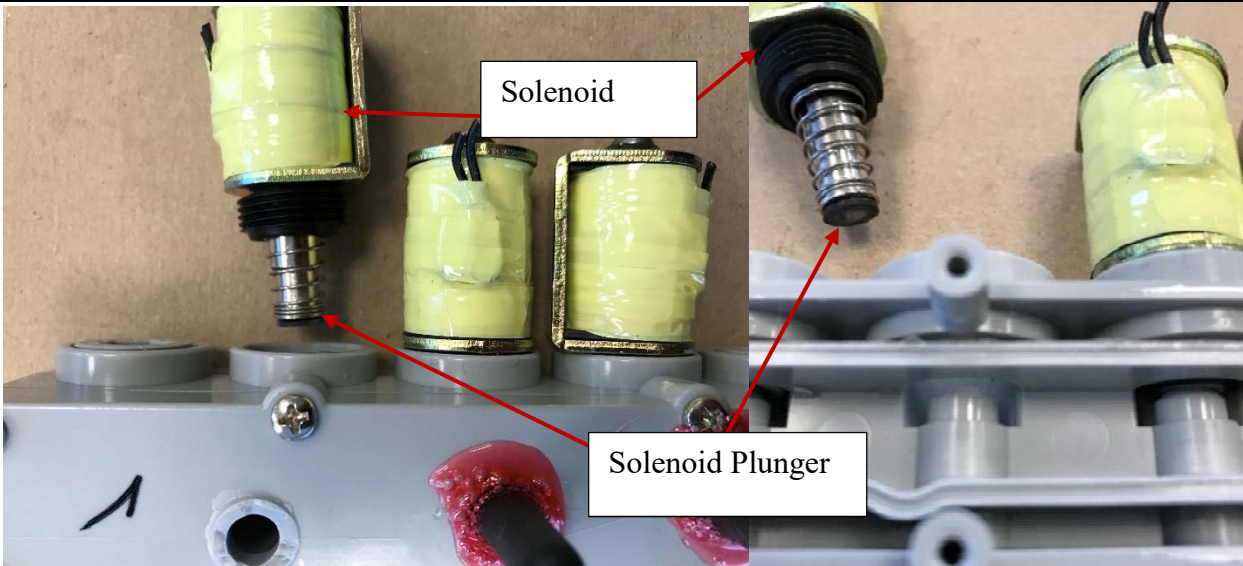
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photographs of Gen X)</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>There are a plurality of valves:</p>  <p>(Photographs of Gen X)</p> <p>The valve is fluidly coupled to the bladder of an air inflatable mattress. For example, as seen in the photographs below, tubing fluidly couples the enclosure of the valve enclosure assembly to one or more bladders. Accordingly, the valve is capable of being in fluid communication with the at least one air bladder.</p> |

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

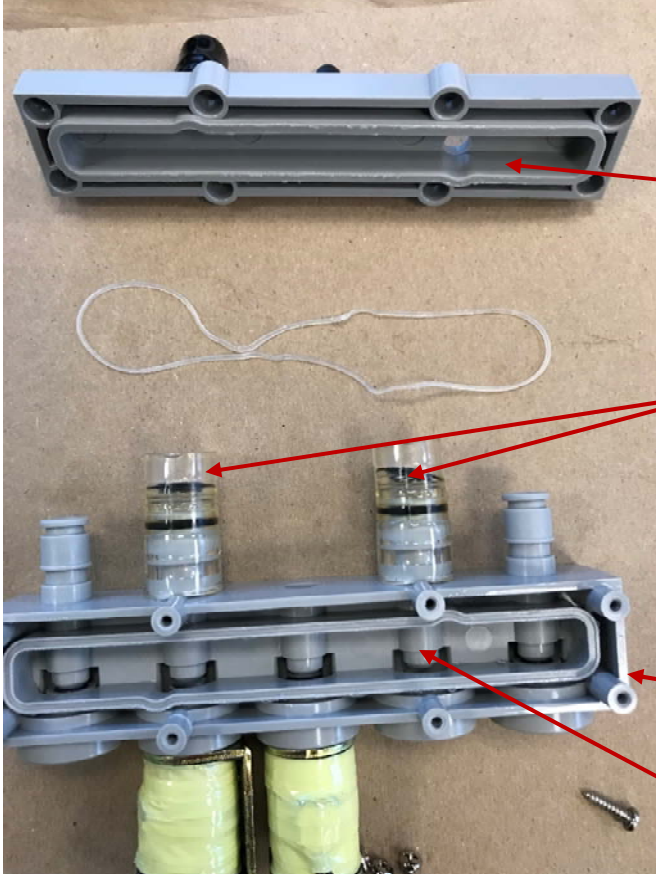
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>(Photographs of Gen X)</p> |

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

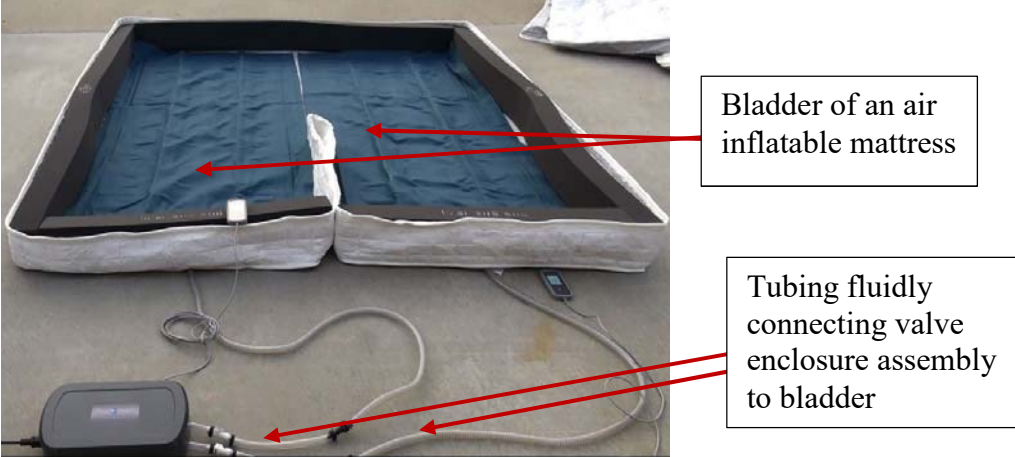
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>(exemplary photo of air mattress system)</p> <p>When the valve is open, air (represented by blue arrows) can pass from the substantially fluidly sealed air chamber of the enclosure of the valve enclosure assembly through the valve and tubing fluidly connecting the valve enclosure assembly to the bladder of the air inflatable mattress. Thus, when open, the valve allows for the fluidly coupling of the air chamber to at least one air bladder. However, this fluid coupling is selective or selectable because when the valve is closed, air cannot pass from the air chamber through the valve. Accordingly, the valve is capable of being in selective fluid communication with the air chamber. Thus, when closed, the air chamber and the air bladder are not fluidly coupled.</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="1381 581 1606 755">Air Chamber of the Valve Enclosure Assembly</p> <p data-bbox="680 1198 976 1230">(Photograph of Gen X)</p> |

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

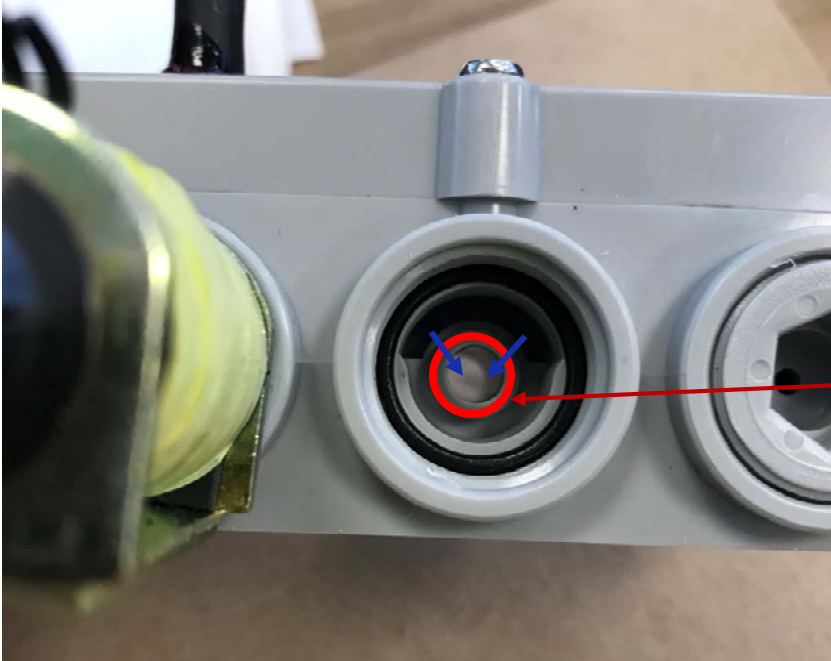
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="682 1015 976 1047">(Photograph of Gen X)</p> <p data-bbox="682 1096 1984 1315">The Accused Products having a Gen 3 Koge air controller include at least one valve operably coupled to the enclosure and capable of being in selective fluid communication with the air chamber. Specifically, the enclosure of the valve enclosure assembly of the Gen 3 Koge includes a plurality of valves operably coupled to the enclosure. The valves are capable of being in fluid communication with the at least one air bladder and in selective or selectable fluid communication with the air chamber.</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The enclosure of the valve enclosure assembly of the Gen 3 Koge includes a plurality of valves fluidly connected to the bladder. The photograph below shows a valve in that is partially contained within the enclosure of the valve enclosure assembly of the Gen 3 by Koge device. That is, when the modular valve enclosure assembly elements are connected, the valve is, at least partially, contained within the substantially fluidly sealed air chamber of the enclosure of the valve enclosure assembly. The valves allow for, are configured to, or are capable of the selective or selectable fluid coupling of the air chamber to at least one air bladder. The valve is created by a valve seat formed from the mold of the enclosure of the valve enclosure assembly and the plunger of a solenoid, which is inserted into the enclosure.</p> |

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

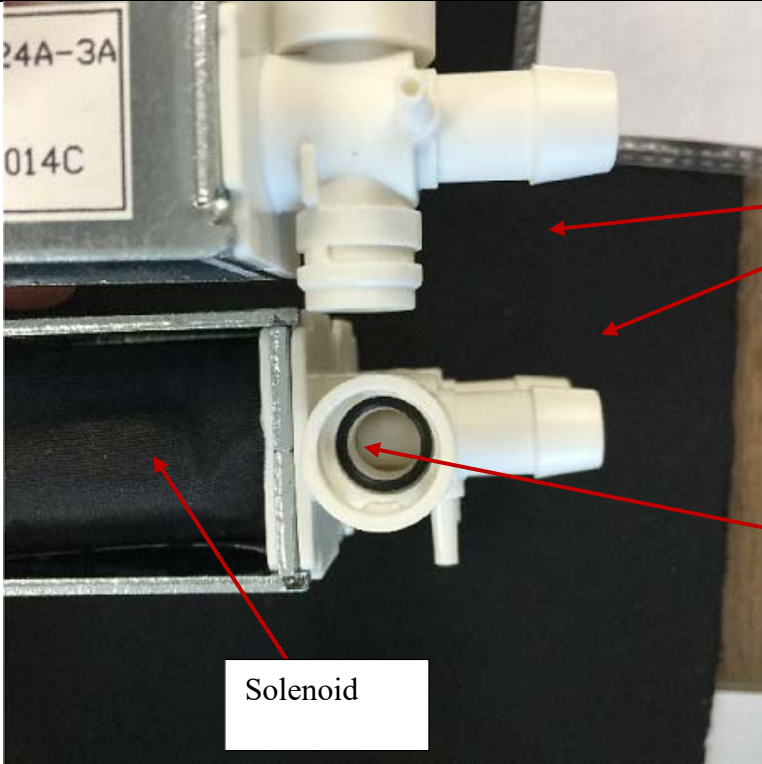
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photograph of Gen 3 Koge)</p> <p>The photograph shows a close-up of a mechanical assembly. A white solenoid is mounted on a metal frame. Below it is a valve assembly with a white plastic enclosure. Red arrows point from text boxes to these components: 'Solenoid' points to the white solenoid, 'Valve location' points to the valve opening, and 'Enclosure of the Valve Enclosure Assembly' points to the white plastic housing. A label with '24A-3A' and '014C' is visible in the background.</p> |

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

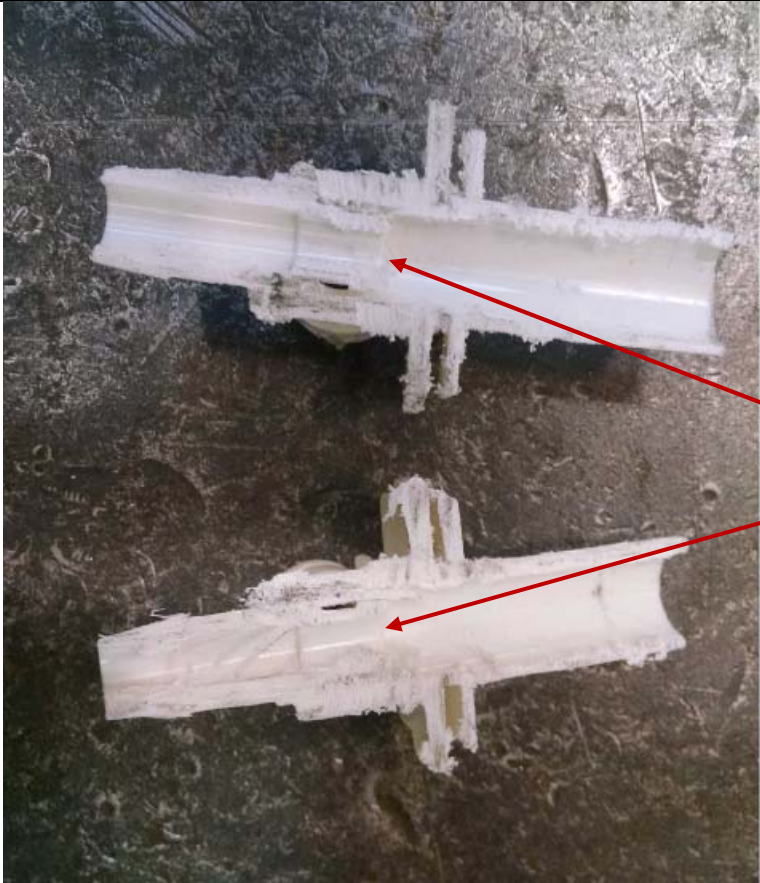
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="680 1224 1045 1260">(Photograph of Gen 3 Koge)</p> <p data-bbox="680 1312 1990 1382">The solenoid is seen in a partially deconstructed state below. The solenoid includes a solenoid plunger within the enclosure that is capable of connecting or coupling to the valve seat.</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>(Photograph of Gen 3 Koge)</p> |

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

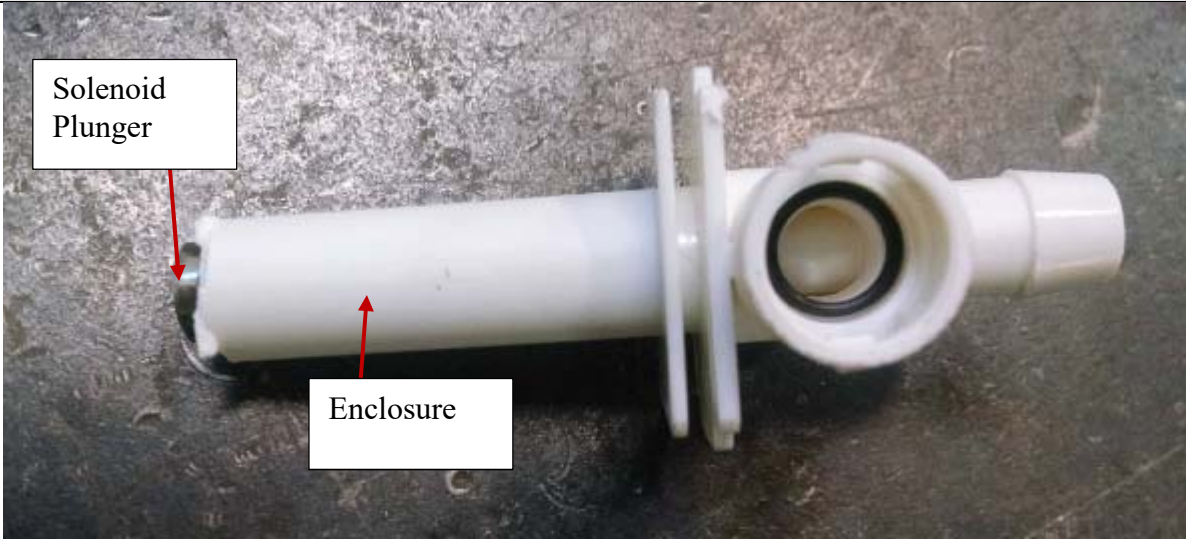
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photograph of Gen 3 Koge)</p> <p>The valve is fluidly coupled to the bladder of an air inflatable mattress. For example, as seen in the photographs below, tubing fluidly couples the valve enclosure assembly to one or more bladders.</p> |

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

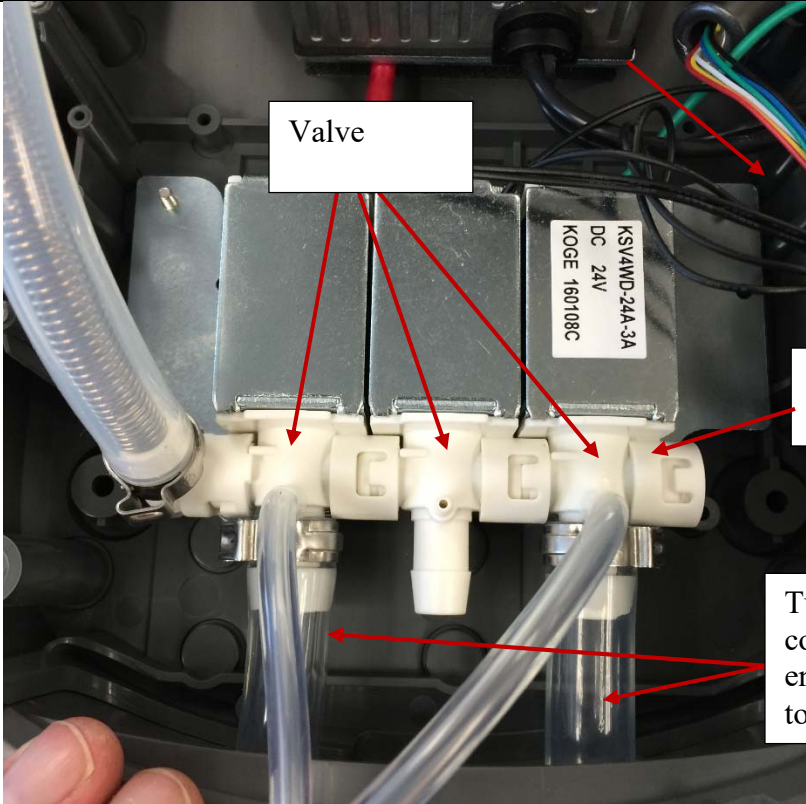
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>(Photographs of Gen 3 Koge)</p> <p>When the valve is open, air can pass from the substantially fluidly sealed air chamber of the valve enclosure assembly through the valve and through the tubing fluidly connecting the valve enclosure assembly to the bladder of the air inflatable mattress. Thus, when open, the valve allows for the fluidly coupling of the air chamber to at least one air bladder. However, this fluid coupling is selective or selectable because when the valve is closed, air cannot pass from the air chamber through the valve.</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|--|--|
| | <p>Accordingly, the valve is capable of being in selective fluid communication with the air chamber. Thus, when closed, the air chamber and the air bladder are not fluidly coupled.</p> |
| <p>[16.3] pressure monitor means being operably coupled to the processor and being in fluid communication with the at least one valve for monitoring the pressure in the at least one bladder.</p> | <p>The “pressure monitor means” is a means-plus-function limitation subject to pre-AIA 35 U.S.C. § 112, ¶ 6. The function is monitoring the pressure in the at least one bladder. The structure is a port fluidly coupled to the interior of the valve enclosure assembly that is designed to receive a tube, a pressure sensor, and a tube connected to the port and to the pressure sensor, and equivalents thereof. Under this construction, and where the other claim terms are given their plain and ordinary meaning in light of the specification, the Gen 3 Arco, Gen X, and Gen 3 Koge Air Controllers include a pressure monitor means being operably coupled to the processor and being in fluid communication with the at least one valve for monitoring the pressure in the at least one bladder.</p> <p>The Accused Products having a Gen 3 Arco air controller include pressure monitor means operably coupled to the processor. Specifically, the valve enclosure assembly of the Gen 3 Arco includes a pressure monitoring port, which is capable of being in fluid communication with the interior of the enclosure of the valve enclosure assembly.</p> |

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

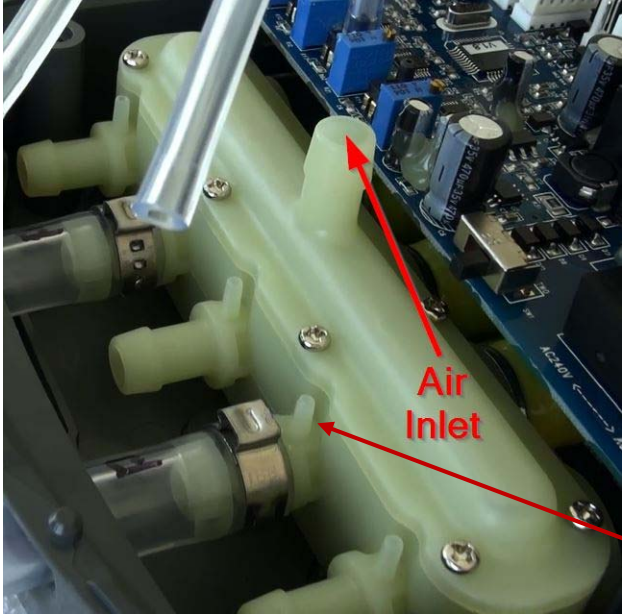
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>Gen 3 Arco:</p>  <p>(Photograph of Gen 3 Arco)</p> <p>As seen, a tube is connected to the pressure monitoring port. The tube is also connected to a pressure sensor. In addition, and as discussed above, the pressure in the one or more air bladders is conveyed to the enclosure of the valve enclosure assembly via the tubing that fluidly couples the valve enclosure assembly to the air bladder(s). The pressure monitoring port is located between the valve(s) and the air bladder(s).</p> |

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

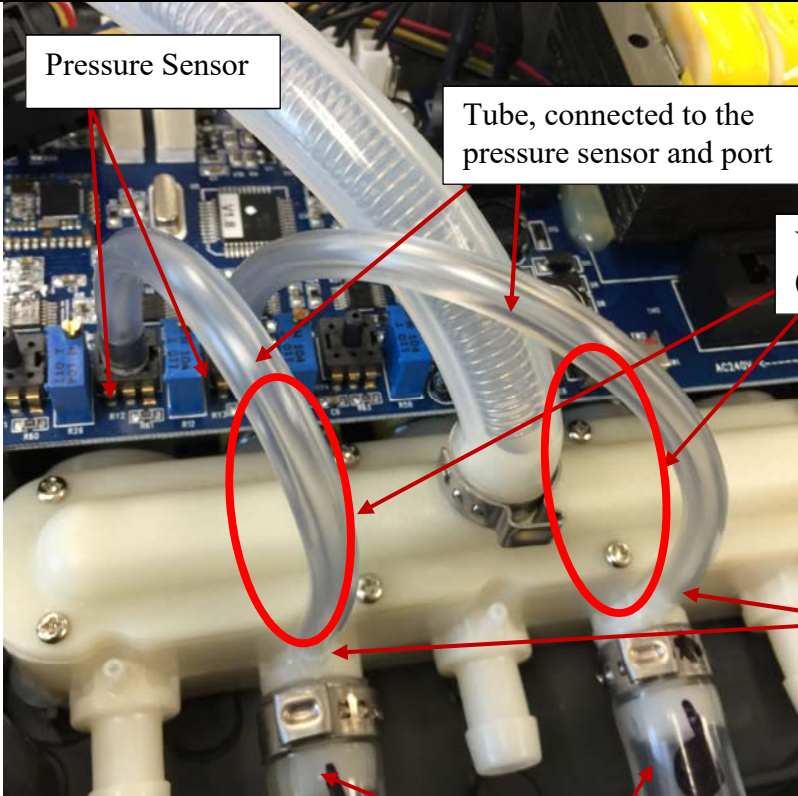
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>Pressure Sensor</p> <p>Tube, connected to the pressure sensor and port</p> <p>Valve (general location)</p> <p>Port in fluid communication with the interior of the enclosure of the valve enclosure assembly</p> <p>(Photograph of the Gen 3 Arco)</p> <p>Tubing Fluidly Coupling the Valve Enclosure Assembly to an Air Bladder</p> |

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

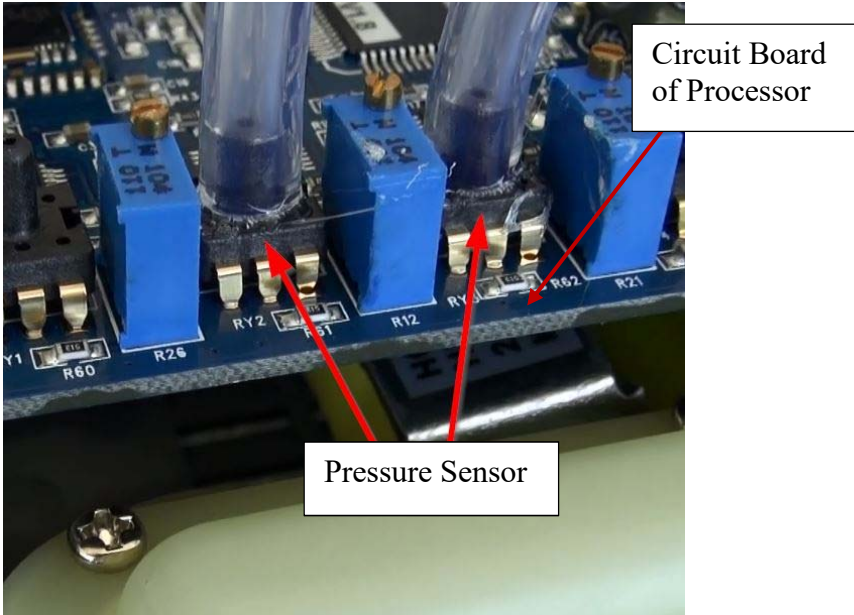
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The pressure sensor is operatively coupled to a processor. The processor is configured to monitor and capable of continuously monitoring the pressure detected by the pressure sensor.</p>  <p>(Photograph of Gen 3 Arco)</p> <p>The pressure monitor means is capable of being in fluid communication with the at least one valve for continuously monitoring the pressure in the at least one bladder. Tubing connects the pressure sensor(s) to the pressure monitoring port(s) of the valve enclosure assembly, the pressure sensor is capable of being in fluid communication with the enclosure of the valve enclosure assembly. Because the valve is located just upstream of the pressure monitoring port, the valve and the pressure monitoring port are in fluid communication. Accordingly, the pressure sensor is capable of being in fluid communication with the valve. Tubing fluidly couples the valve enclosure assembly to the air bladder(s), the valve, pressure monitoring port, and air bladder(s) are capable of being in fluid</p> |

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

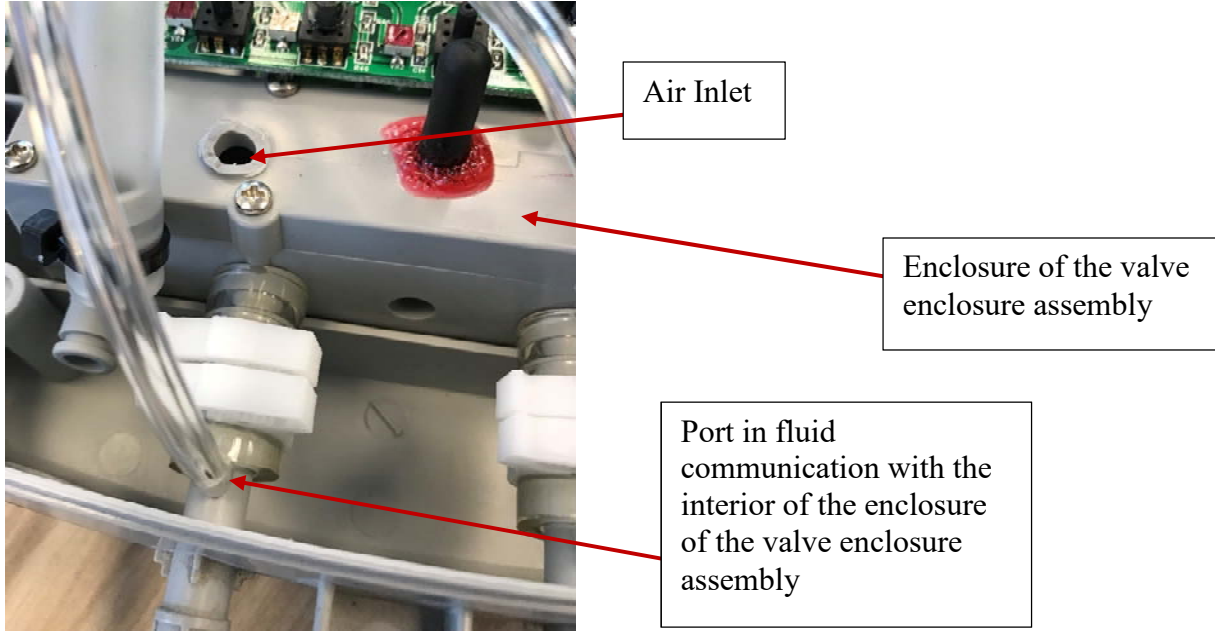
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>communication with each other. The pressure sensor and the processor of the pressure monitor means is therefore able to or capable of continuously monitoring the pressure in the air bladder(s) by monitoring the pressure conveyed from the pressure monitoring port.</p> <p>The Accused Products having a Gen X air controller include pressure monitor means operably coupled to the processor. Specifically, the valve enclosure assembly of the Gen X includes a pressure monitoring port, which is capable of being in fluid communication with the interior of the enclosure of the valve enclosure assembly.</p> <p>Gen X:</p>  <p>(Photograph of Gen X)</p> |

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

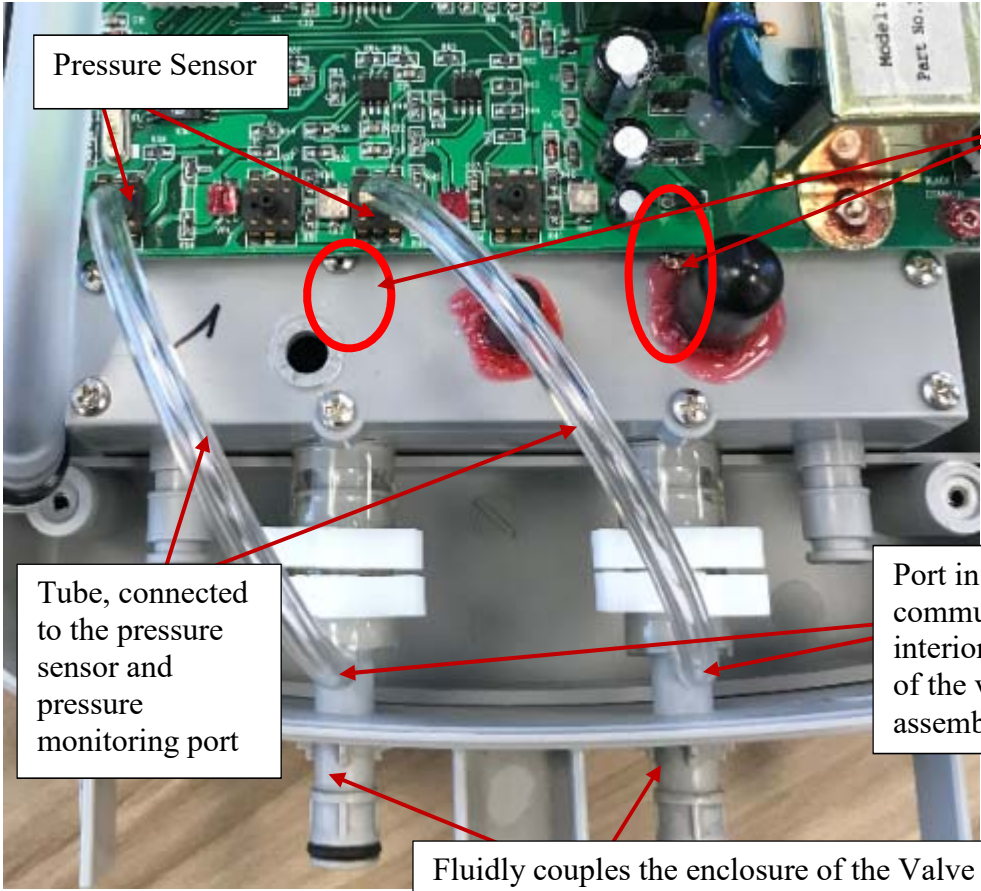
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>As seen, a tube is connected to the pressure monitoring port and to a pressure sensor. In addition, and as discussed above, the pressure in the one or more air bladders is conveyed to the enclosure of the valve enclosure assembly via the tubing that fluidly couples the valve enclosure assembly to the air bladder(s). The pressure monitoring port is located between the valve(s) and the air bladder(s).</p>  <p>(Photograph of the Gen X)</p> |

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

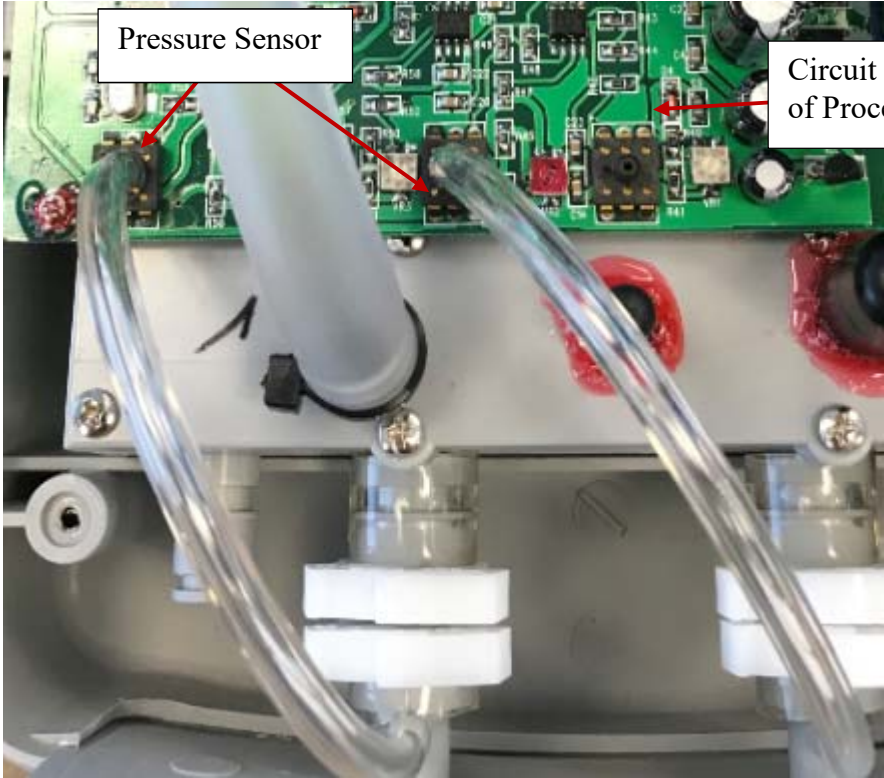
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>The pressure sensor is operatively coupled to a processor. The processor is configured to monitor and capable of continuously monitoring the pressure detected by the pressure sensor.</p>  <p>(Photograph of Gen X)</p> <p>The pressure monitor means is capable of being in fluid communication with the at least one valve for continuously monitoring the pressure in the at least one bladder. Tubing connects the pressure sensor(s) to the pressure monitoring port(s) of the valve enclosure assembly, the pressure sensor is</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <p>capable of being in fluid communication with the enclosure of the valve enclosure assembly. Because the valve is located just upstream of the pressure monitoring port, the valve and the pressure monitoring port are in fluid communication. Accordingly, the pressure sensor is capable of being in fluid communication with the valve. Tubing fluidly couples the valve enclosure assembly to the air bladder(s), the valve, pressure monitoring port, and air bladder(s) are capable of being in fluid communication with each other. The pressure sensor and the processor of the pressure monitor means is therefore able to or capable of continuously monitoring the pressure in the air bladder(s) by monitoring the pressure conveyed from the pressure monitoring port.</p> <p>The Accused Products having a Gen 3 Koge air controller include pressure monitor means operably coupled to the processor. Specifically, the enclosure of the valve enclosure assembly of the Gen 3 Koge includes a pressure monitoring port, which is capable of being in fluid communication with the interior of the enclosure of the valve enclosure assembly.</p> |

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

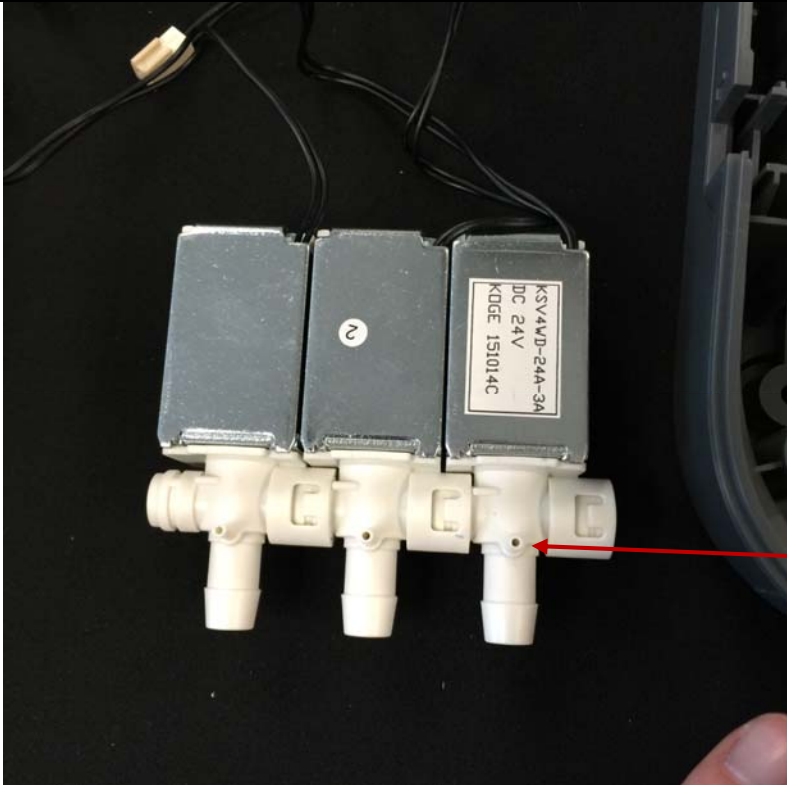
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="1520 756 1885 976">Port in fluid communication with the interior of the enclosure of the valve enclosure assembly</p> <p data-bbox="680 1130 1050 1162">(Photograph of Gen 3 Koge)</p> <p data-bbox="680 1219 1976 1395">As seen in the photograph above, a tube is connected to the pressure monitoring port. The tube is also connected to a pressure sensor. In addition, and as discussed above, the valve is capable of being in fluid communication with the one or more air bladders via tubing that fluidly couples the two components. The valve is also just upstream of the pressure monitoring port, and is therefore capable of being in fluid communication with the pressure monitoring port. Accordingly, when the pressure</p> |

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

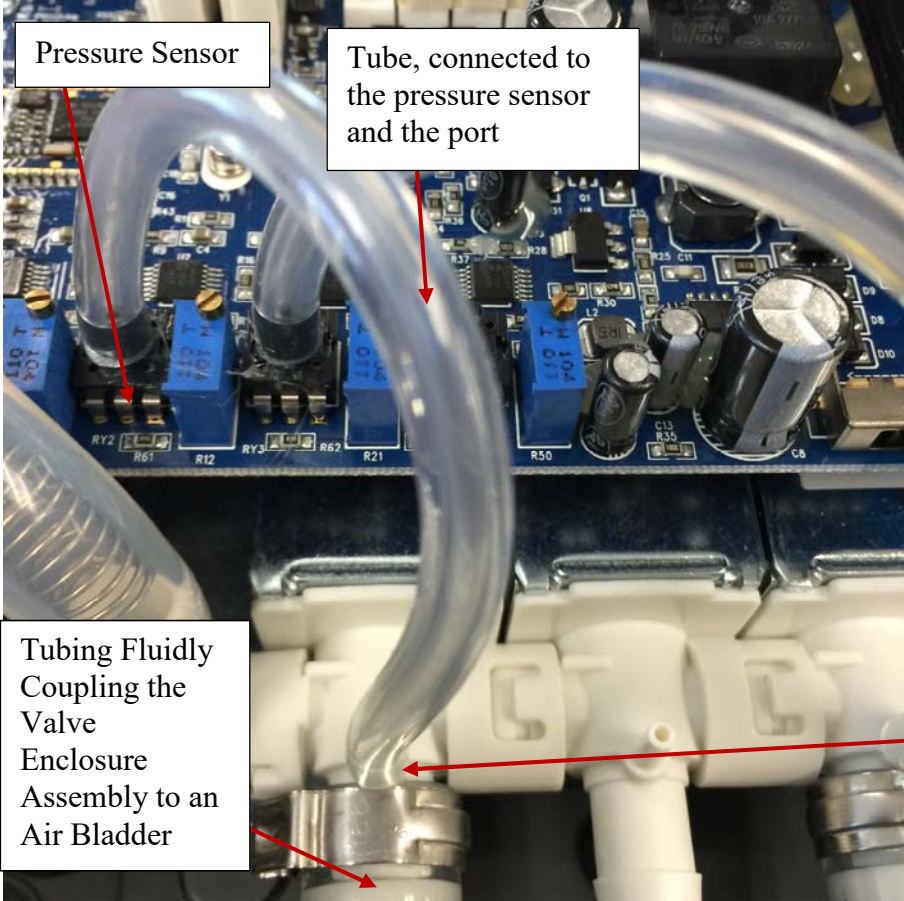
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>from the pressure monitoring port is conveyed to the pressure sensor from the enclosure of the valve enclosure assembly via the tubing connected to the pressure monitoring port and pressure sensor, the pressure monitor means can monitor the pressure in the at least one bladder.</p>  <p>Pressure Sensor</p> <p>Tube, connected to the pressure sensor and the port</p> <p>Tubing Fluidly Coupling the Valve Enclosure Assembly to an Air Bladder</p> <p>Port in fluid communication with the interior of the enclosure of the valve enclosure assembly</p> <p>(Photograph of the Gen 3 Koge)</p> |

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

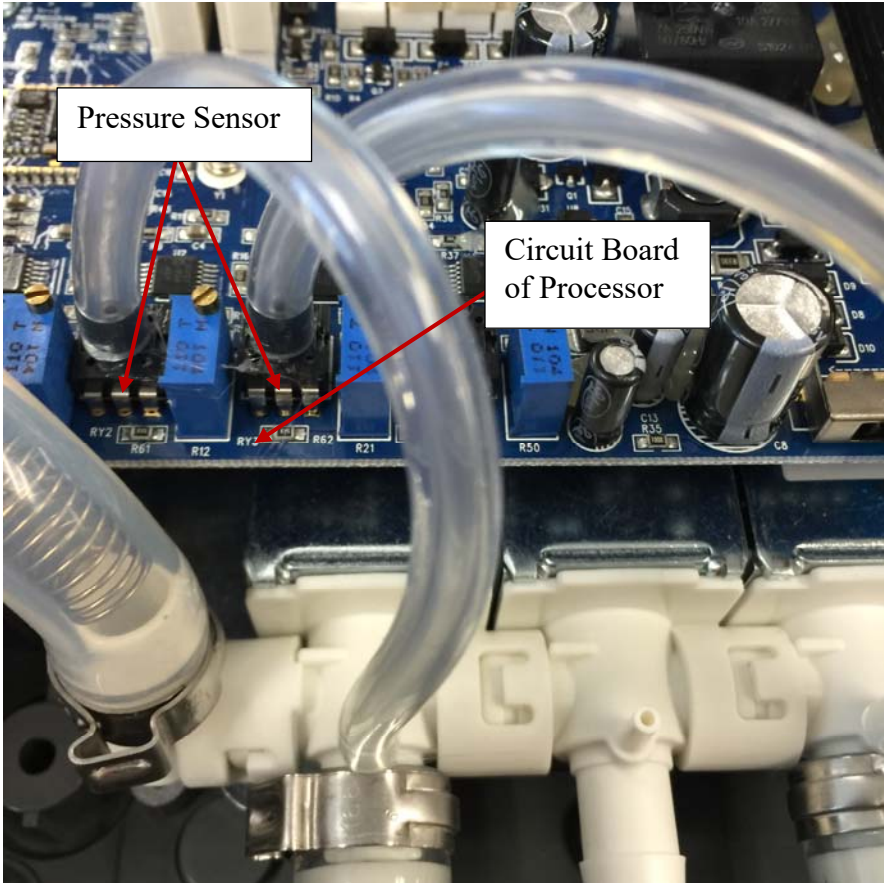
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>The pressure sensor is operatively coupled to a processor. The processor is configured to monitor and capable of continuously monitoring the pressure detected by the pressure sensor.</p>  <p>(Photograph of Gen 3 Koge)</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>Versions 1.8, 1.9, 1.92, 1.97, and 2.0 of the source code further demonstrate that Gen 3 Accused Products' processors are configured to monitor and do monitor, or are capable of monitoring, the pressure detected by the pressure sensor(s).</p>  |

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

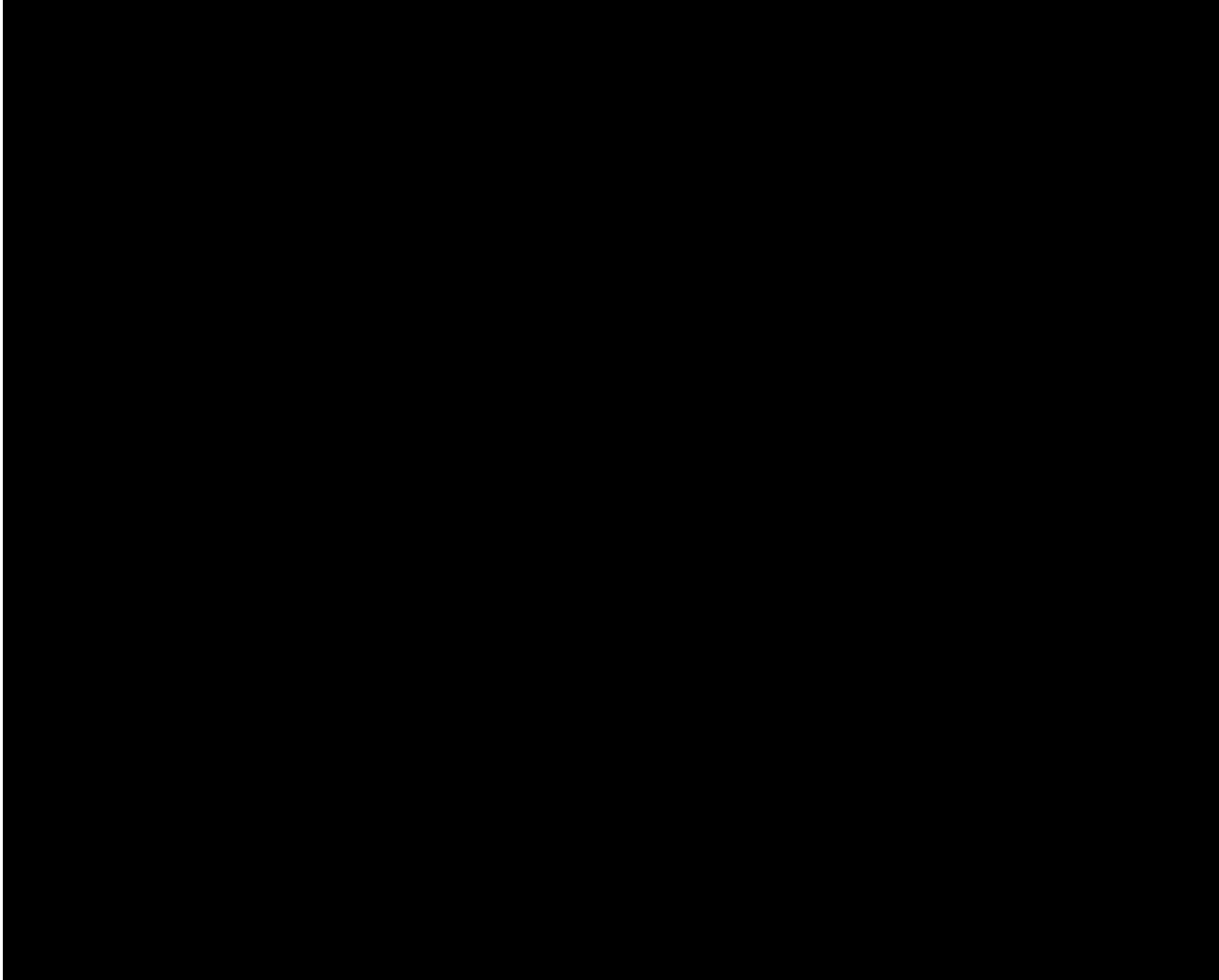
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| |  A large black rectangular redaction covers the entire content area of the table, obscuring all text and data. |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|----------------------|---|
| |  A large black rectangular redaction covers the entire content area of the table, obscuring all text and data. |

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

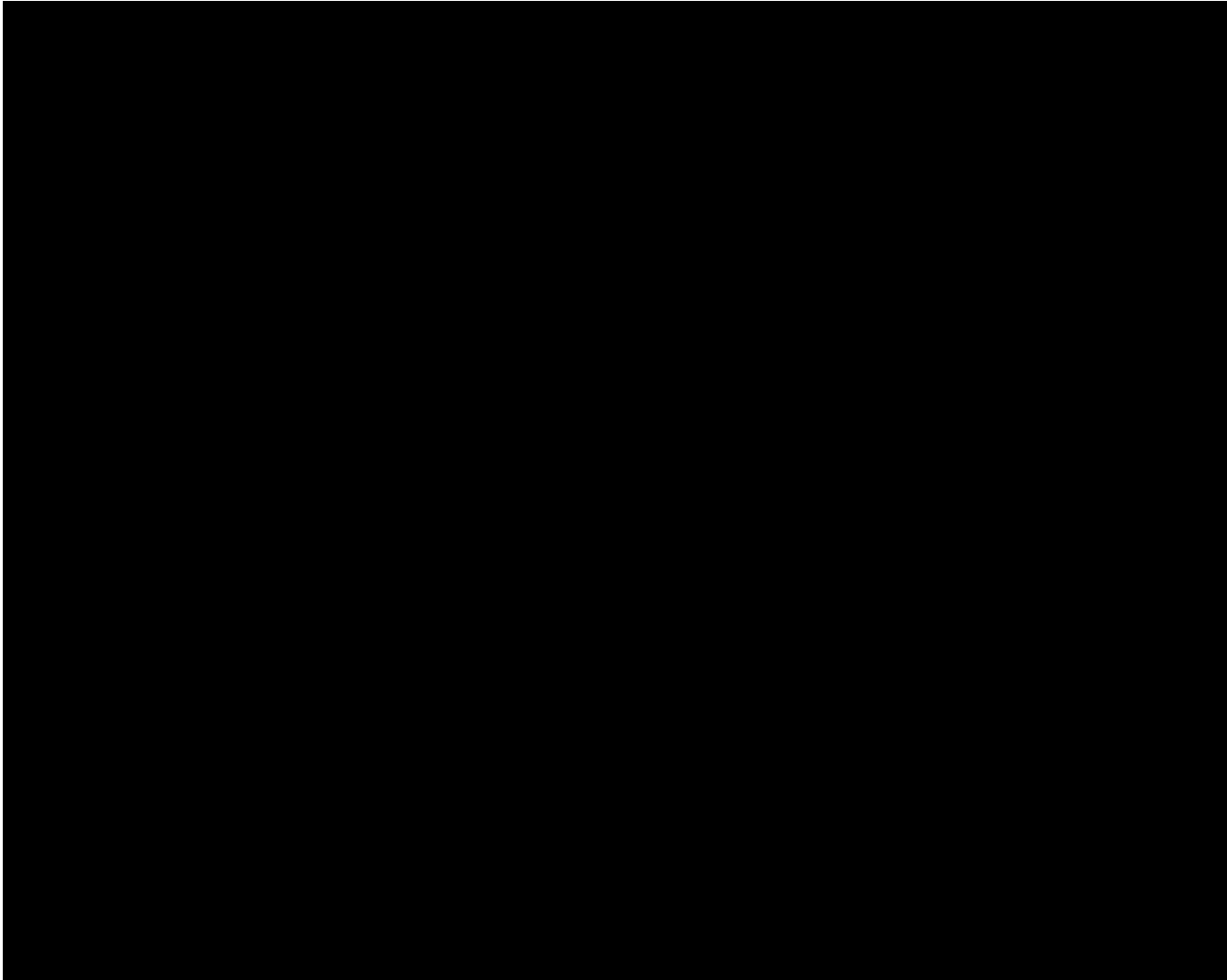
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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EXHIBIT A1 - U.S. PATENT NO. 5,904,172 VERSUS AMERICAN NATIONAL MANUFACTURING ACCUSED PRODUCTS

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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EXHIBIT A1 - U.S. PATENT NO. 5,904,172 VERSUS AMERICAN NATIONAL MANUFACTURING ACCUSED PRODUCTS

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---|---|
| | <div data-bbox="676 344 1995 743" style="background-color: black; width: 100%; height: 246px; margin-bottom: 10px;"></div> <p data-bbox="676 779 1974 1031">This limitation may further implicate other electronics, software, firmware, and/or source code of the Accused Products. Additional Source Code for the Accused Products may further show how this claim limitation is met. To resolve a dispute regarding Plaintiff’s Notice of Inspection for Source Code, the parties have agreed that Plaintiff shall be allowed to inspect remaining Source Code for the Accused Products on mutually agreeable date(s), after which Plaintiff shall supplement its infringement contentions, pursuant to an agreed-upon timeline and without opposition, using the information learned during the inspection.</p> |
| <p data-bbox="109 1101 231 1128">Claim 20</p> | |
| <p data-bbox="109 1156 651 1396">[20.P] 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</p> | <p data-bbox="676 1156 1984 1396">The preamble of claim 20 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</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---|--|
| <p>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, comprising:</p> | <p>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> <div data-bbox="680 587 1390 1305" data-label="Image"> <p>The photograph shows the internal components of a Gen 3 Arco air controller. At the top is a large, white, ribbed cylindrical pump. Below it is a blue printed circuit board (PCB) with various electronic components. A clear plastic tube is connected to the pump and leads to a white, cylindrical valve enclosure assembly at the bottom. A red arrow points from a text box to this assembly.</p> </div> <div data-bbox="1486 1073 1740 1226" data-label="Text"> <p>Enclosure of Valve Enclosure Assembly</p> </div> <p>(Photograph of Gen 3 Arco)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>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:</p>  <p>(Photograph of Gen X)</p> <p>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:</p> |



Enclosure of Valve Enclosure Assembly

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

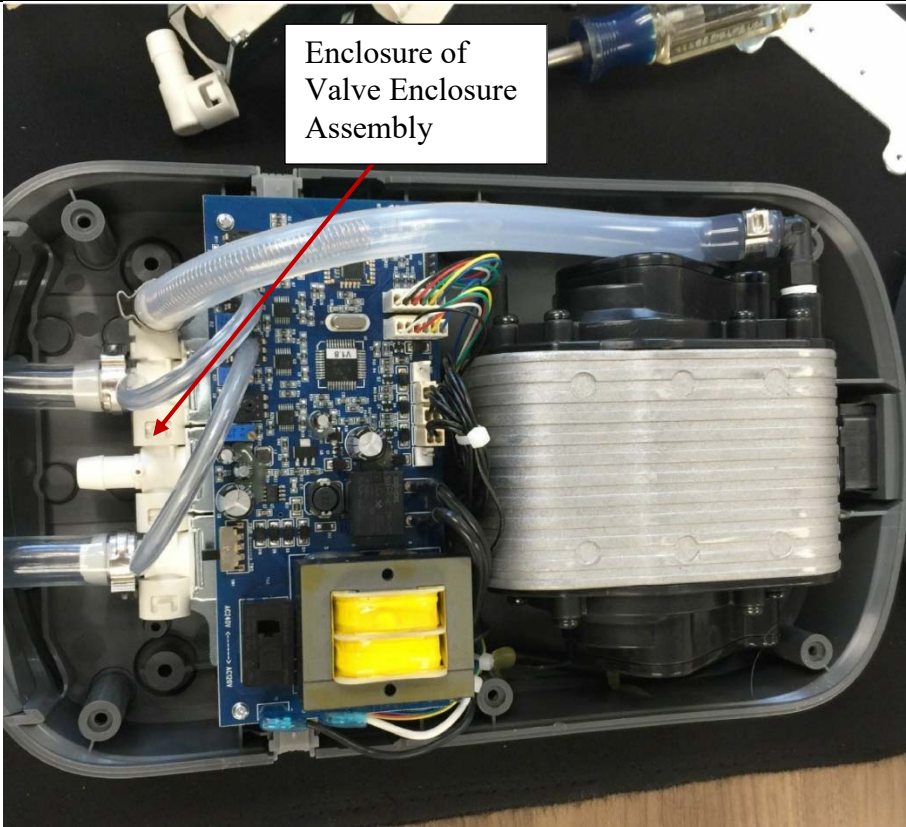
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="961 363 1222 500">Enclosure of Valve Enclosure Assembly</p> <p data-bbox="680 1172 1050 1205">(Photograph of Gen 3 Koge)</p> <p data-bbox="680 1305 1965 1409">The valve enclosure assemblies of the Gen 3 Arco, Gen X, 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.</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1453 425 1722 519">Air Inflatable Mattress</p> <p data-bbox="680 912 997 1058">Air Controller containing the Valve Enclosure Assembly</p> <p>The photograph shows a white, quilted air inflatable mattress on a grey floor. A black air controller unit is connected to the mattress via a grey hose. A red arrow points from the text box 'Air Inflatable Mattress' to the mattress, and another red arrow points from the text box 'Air Controller containing the Valve Enclosure Assembly' to the controller unit.</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>A photograph showing a blue inflatable mattress system. The mattress is laid out on a light-colored floor, with its air bladders visible. A black air controller unit is connected to the mattress via a grey hose. A red arrow points from the text box 'Air Bladder of Air Inflatable Mattress, which is inflatable by compressed air' to the blue surface of the mattress. Another red arrow points from the text box 'Air Inflatable Mattress' to the entire mattress assembly. A third red arrow points from the text box 'Air Controller containing the Valve Enclosure Assembly' to the black control unit.</p> <p data-bbox="1501 386 1810 571">Air Bladder of Air Inflatable Mattress, which is inflatable by compressed air</p> <p data-bbox="1501 727 1766 820">Air Inflatable Mattress</p> <p data-bbox="747 889 1062 1029">Air Controller containing the Valve Enclosure Assembly</p> |

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

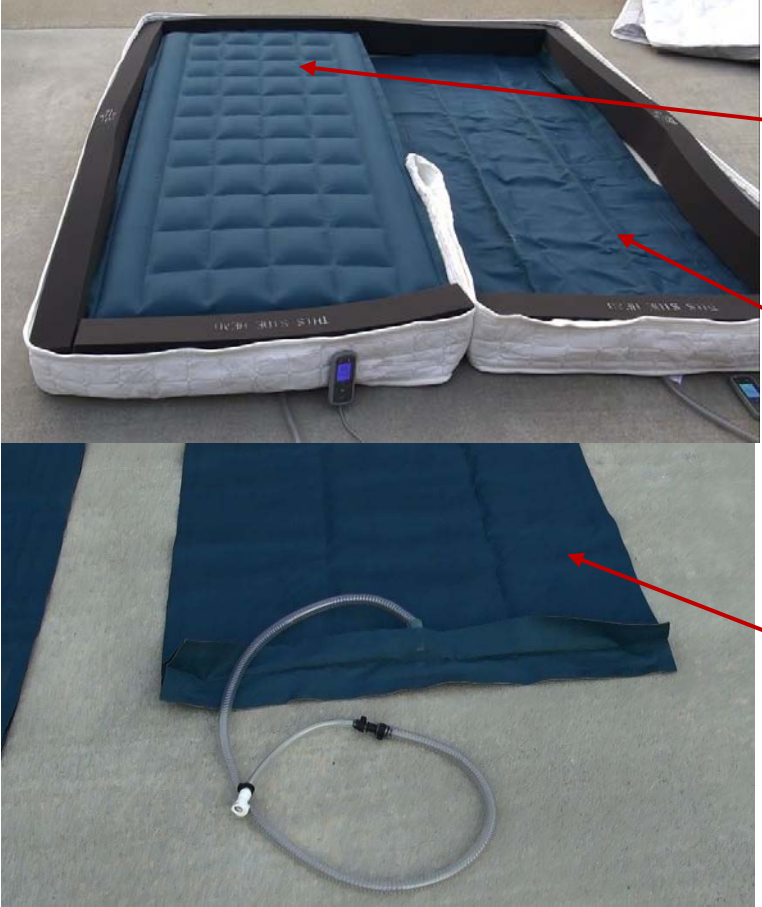
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="1470 357 1774 544">Air Bladder of Air Inflatable Mattress, inflated by compressed air</p> <p data-bbox="1470 568 1774 755">Air Bladder of Air Inflatable Mattress, deflated</p> <p data-bbox="1470 860 1785 1047">Air Bladder of Air Inflatable Mattress, which is inflatable by compressed air</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <div data-bbox="699 354 970 451" style="border: 1px solid black; padding: 5px; width: fit-content;">Air Inflatable Mattress</div> <div data-bbox="1627 378 1942 565" style="border: 1px solid black; padding: 5px; width: fit-content;">Bladders of Air Inflatable Mattress, which are inflatable by compressed air</div> <div data-bbox="1570 755 1885 901" style="border: 1px solid black; padding: 5px; width: fit-content;">Air Controller containing the Valve Enclosure Assembly</div>  <p data-bbox="678 1011 1249 1044">(Photograph of medical air mattress system)</p> <p data-bbox="678 1101 1969 1421">In the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers, the pump is fluidly coupled to the at least one air bladder for providing compressed air thereto. In the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers, the improved valve enclosure assembly is fluidly coupled intermediate the pump and the at least one air bladder for controlling the inflation of the at least one air bladder. As shown in the photographs below, the pump is fluidly coupled to the enclosure of the valve enclosure assembly via tubing. The enclosure of the valve enclosure assembly is then similarly fluidly coupled to the at least one air bladder with tubing. The pump provides compressed air to the at least one air bladder via the tubing between the pump and the enclosure of the valve enclosure assembly and the tubing between the valve enclosure assembly and the air bladder.</p> |

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

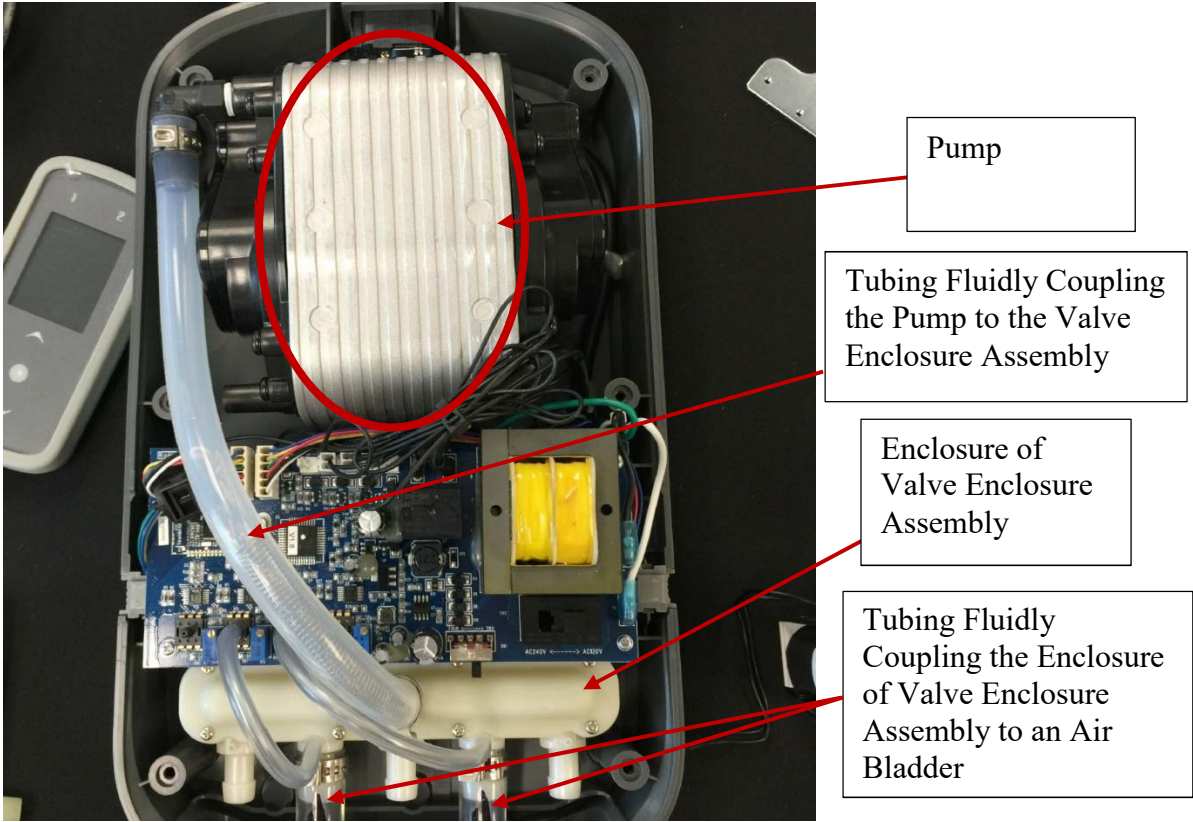
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen 3 Arco:</p>  <p>(Photograph of Gen 3 Arco)</p> |

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

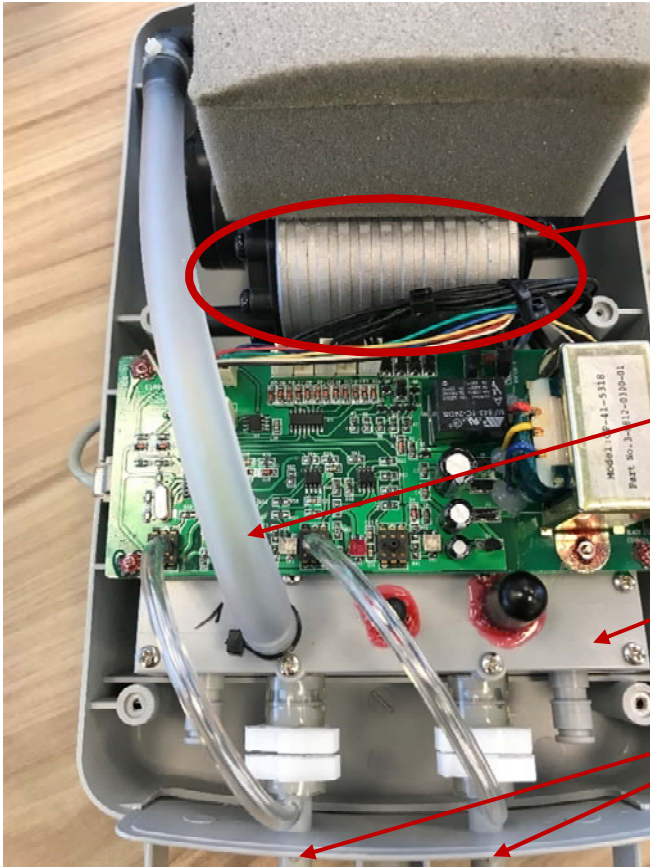
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen X:</p>  <p>(Photograph of Gen X)</p> |

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

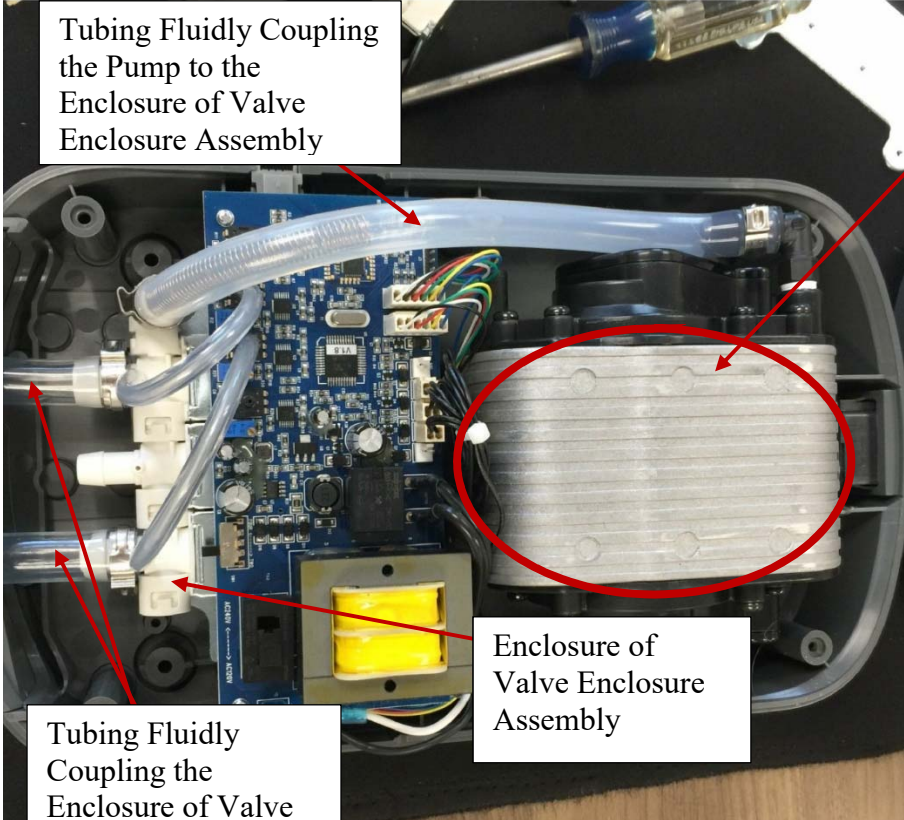
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen 3 Koge:</p>  <p>(Photograph of Gen 3 Koge)</p> |

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

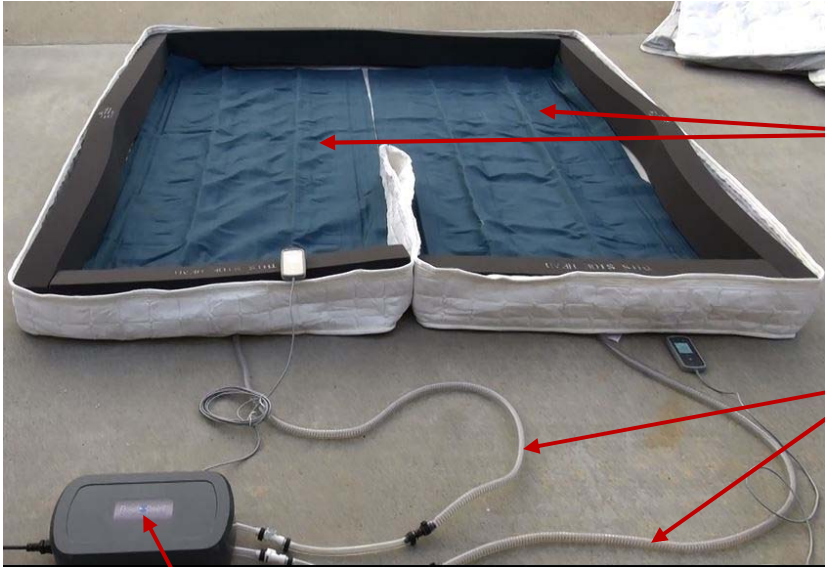
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>As shown in the example of a Gen 3 air controller being used with an inflatable air mattress, the two tubes that fluidly couple to the valve enclosure assembly fluidly couple to the air bladders of the inflatable air mattress. Because the pump is fluidly coupled to the air bladder, the air bladders inflate using the compressed air from the pump.</p>  <p data-bbox="1562 521 1877 708">Air Bladders of Air Inflatable Mattress, which are inflated using compressed air</p> <p data-bbox="1539 751 1848 938">Tubing Fluidly Coupling the Valve Enclosure Assembly to an Air Bladder</p> <p data-bbox="779 1068 1096 1211">Air Controller containing the Valve Enclosure Assembly</p> <p>In the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers, a processor provides commands to the improved valve enclosure assembly during an inflate/deflate cycle:</p> |

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

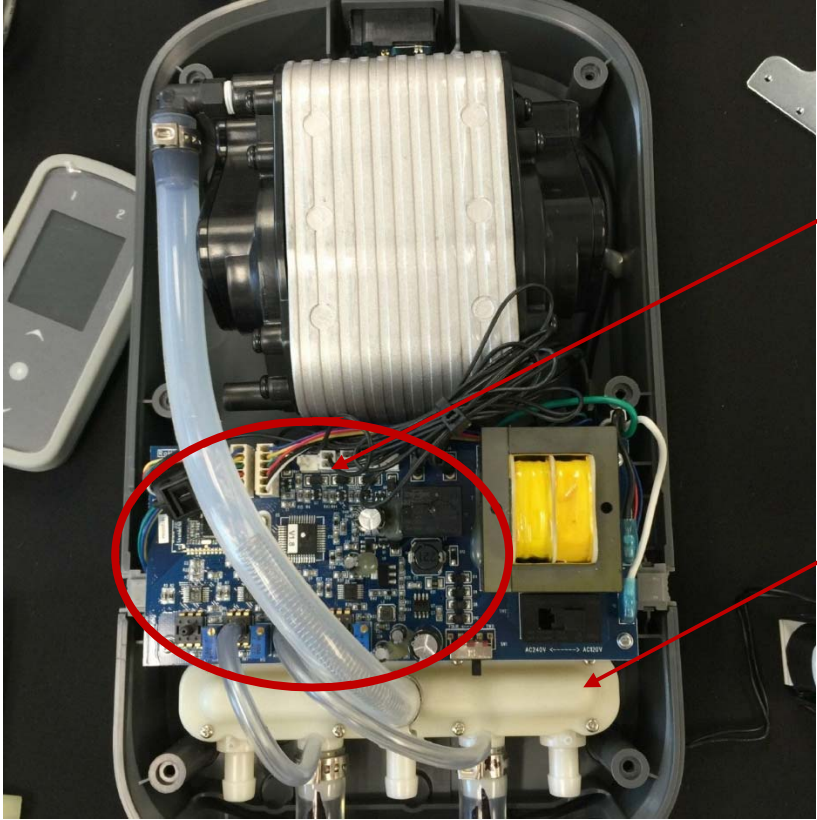
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen 3 Arco:</p>  <p>Printed Circuit Board for Processor, which provides commands to the improved valve enclosure assembly during an inflate/deflate cycle</p> <p>Enclosure of Valve Enclosure Assembly</p> <p>(Photograph of Gen 3 Arco)</p> |

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

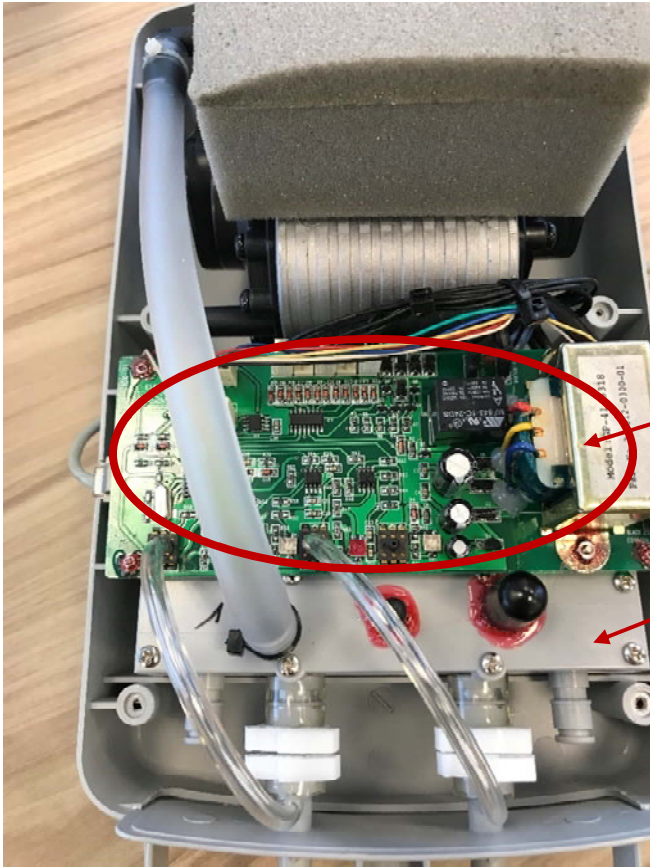
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen X:</p>  <p>(Photograph of Gen X)</p> <p>Printed Circuit Board for Processor, which provides commands to the improved valve enclosure assembly during an inflate/deflate cycle</p> <p>Enclosure of Valve Enclosure Assembly</p> |

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

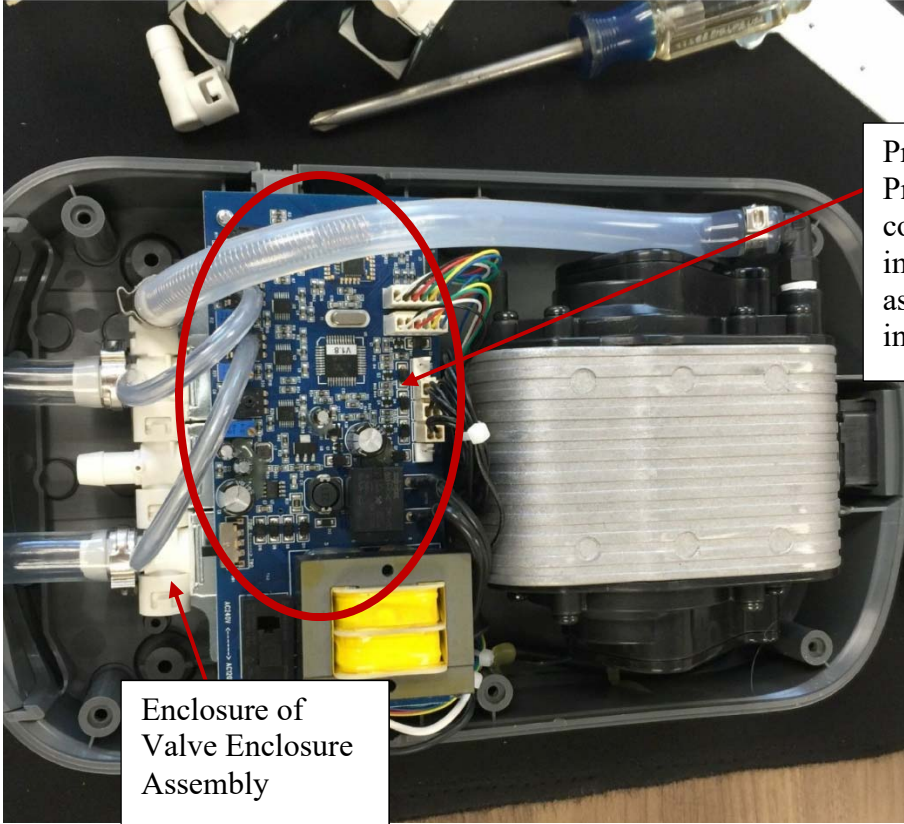
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>Gen 3 Koge:</p>  <p>Printed Circuit Board for Processor, which provides commands to the improved valve enclosure assembly during an inflate/deflate cycle</p> <p>Enclosure of Valve Enclosure Assembly</p> <p>(Photograph of Gen 3 Koge)</p> <p>Versions 1.8, 1.97, and 2.0 of ANM's source code further demonstrate that the Gen 3 Accused Products include a processor for providing commands to the improved valve enclosure assembly during an inflate/deflate cycle.</p> |

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

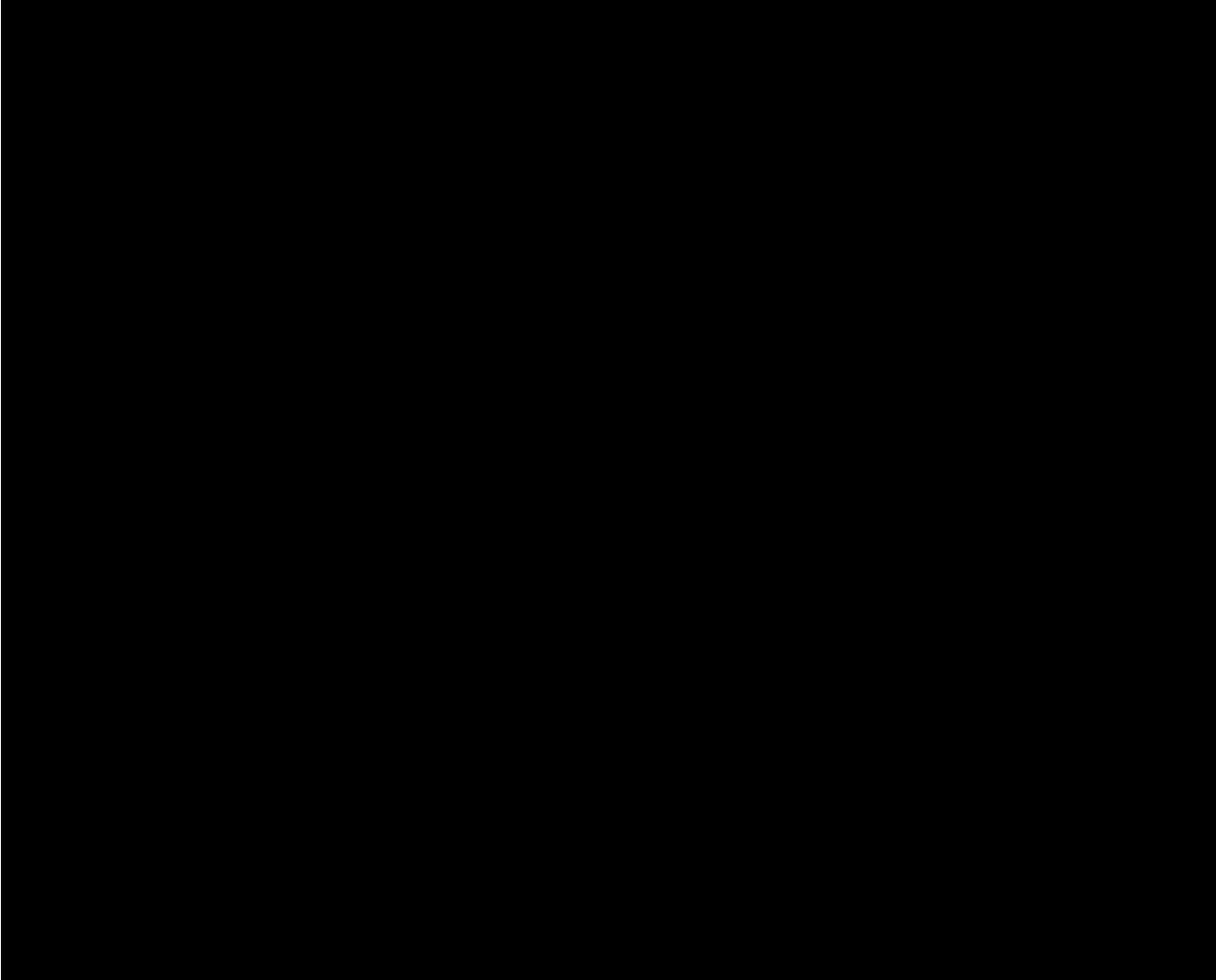
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|----------------------|--|
| |  A large black rectangular redaction covers the entire content area of the 'INFRINGEMENT CONTENTIONS' column. |

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

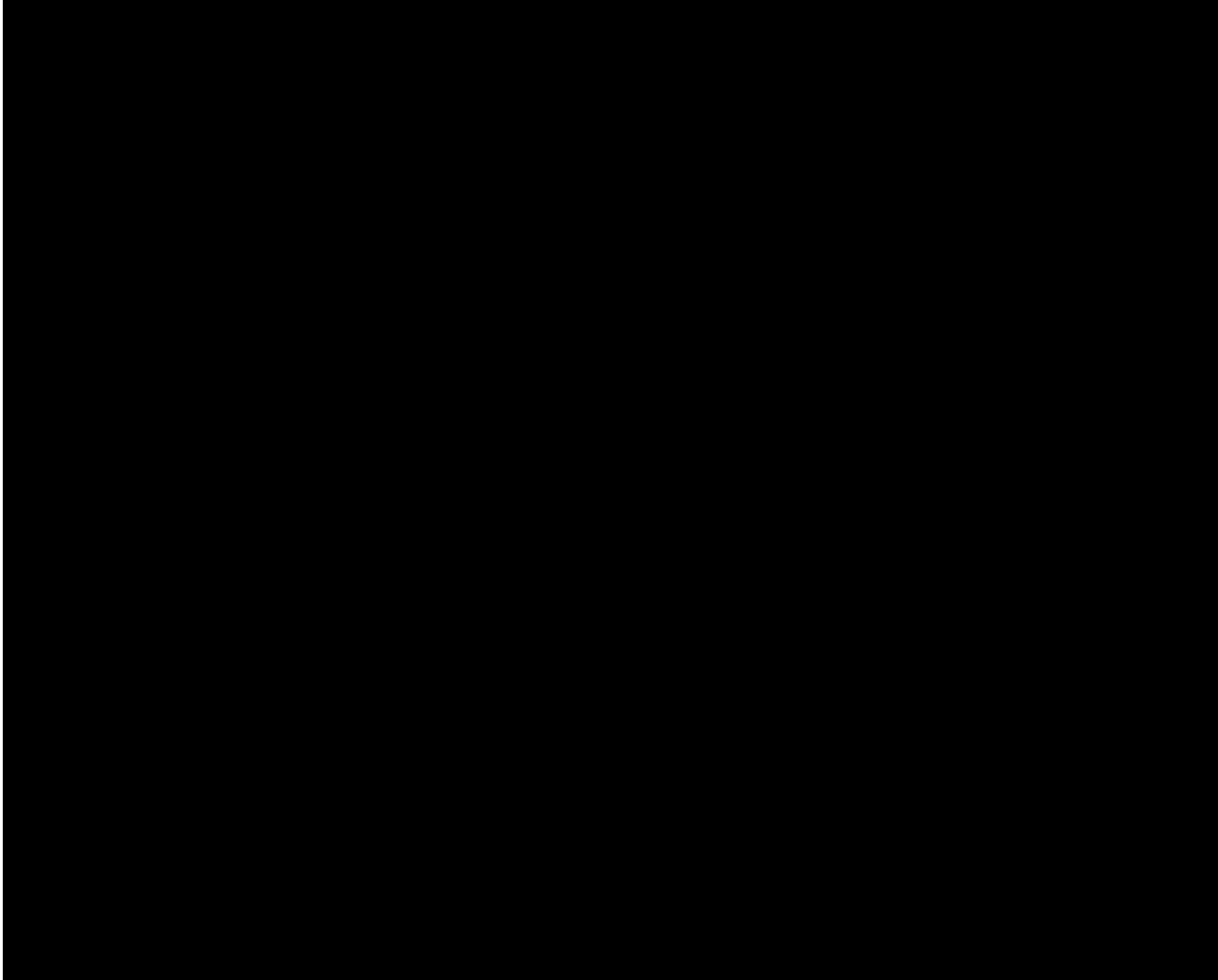
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|----------------------|---|
| |  A large black rectangular redaction covers the entire content area of the table, obscuring all text and data. |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <div data-bbox="674 342 1999 1203" style="background-color: black; width: 100%; height: 530px; margin-bottom: 10px;"></div> <p data-bbox="674 1239 1976 1416">This limitation may further implicate other electronics, software, firmware, and/or source code of the Accused Products. Additional Source Code for the Accused Products may further show how this claim limitation is met. To resolve a dispute regarding Plaintiff's Notice of Inspection for Source Code, the parties have agreed that Plaintiff shall be allowed to inspect remaining Source Code for the Accused Products on mutually agreeable date(s), after which Plaintiff shall supplement its</p> |

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

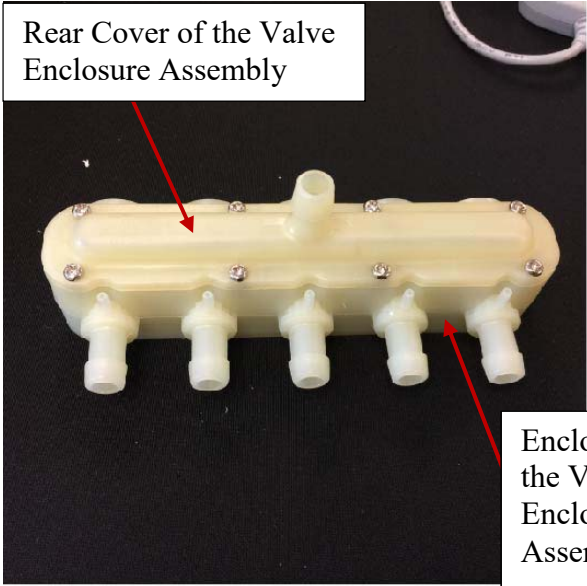
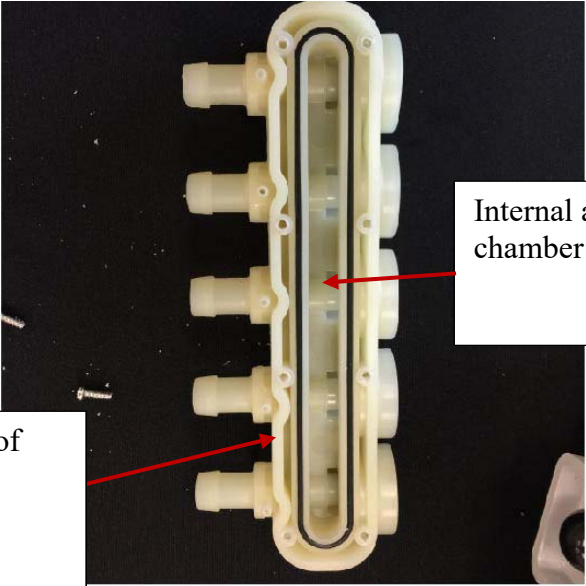

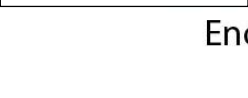

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>infringement contentions, pursuant to an agreed-upon timeline and without opposition, using the information learned during the inspection.</p> <p>Even under Defendants’ construction from the ITC proceeding, where a “valve enclosure assembly” means “an enclosure and a rear cover defining an internal, pressurized air chamber enclosing a valve,” ANM’s Gen 3 or Gen X air controllers meet this claim limitation.</p> <p>As seen in the photographs below, the enclosure of the Gen 3 Arco’s valve enclosure assembly is comprised of an enclosure and a rear cover.</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p>Rear Cover of the Valve Enclosure Assembly</p> </div> <div style="text-align: center;">  <p>Internal air chamber</p> </div> </div> <div style="display: flex; justify-content: space-around; align-items: center; margin-top: 10px;"> <div style="text-align: center;">  <p>Enclosure</p> </div> <div style="text-align: center;">  <p>Enclosure of the Valve Enclosure Assembly</p> </div> <div style="text-align: center;">  <p>Enclosure with Rear Cover Removed</p> </div> </div> <p>(Photograph of the Gen 3 Arco)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|----------------------|---|
| | Furthermore, as seen in the photograph below showing a side perspective view of the Gen 3 Arco's enclosure, the Gen 3 Arco the internal chamber is shown enclosing a valve. |

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

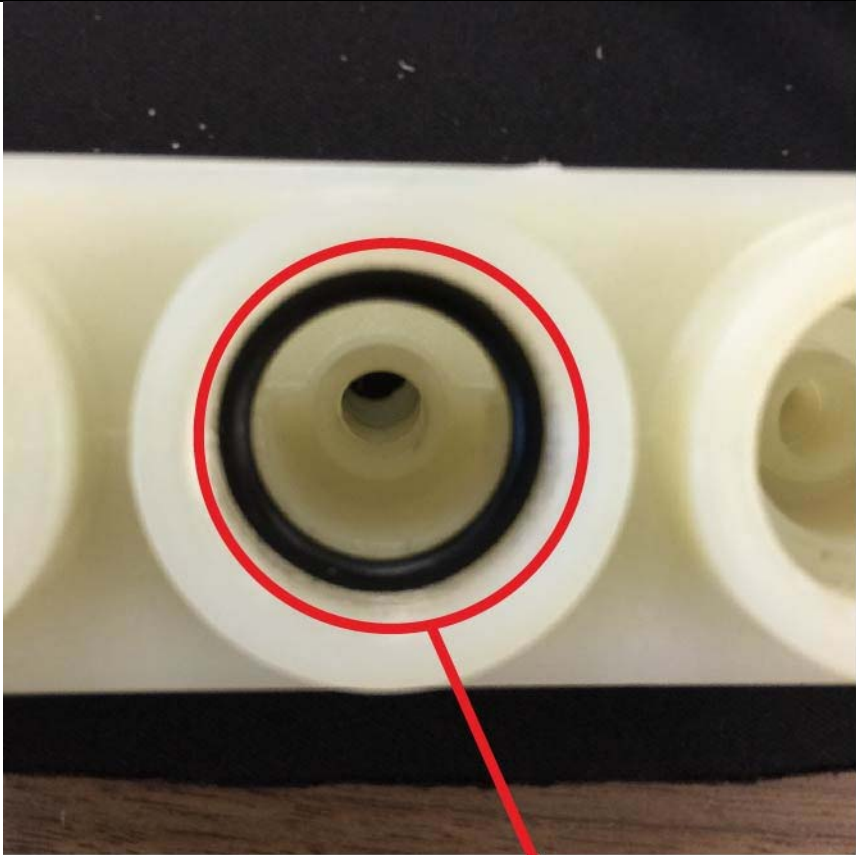
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="829 1289 1656 1360">Perspective view of the internal chamber enclosing a valve</p> <p data-bbox="680 1370 1041 1403">(Photograph of Gen 3 Arco)</p> |

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

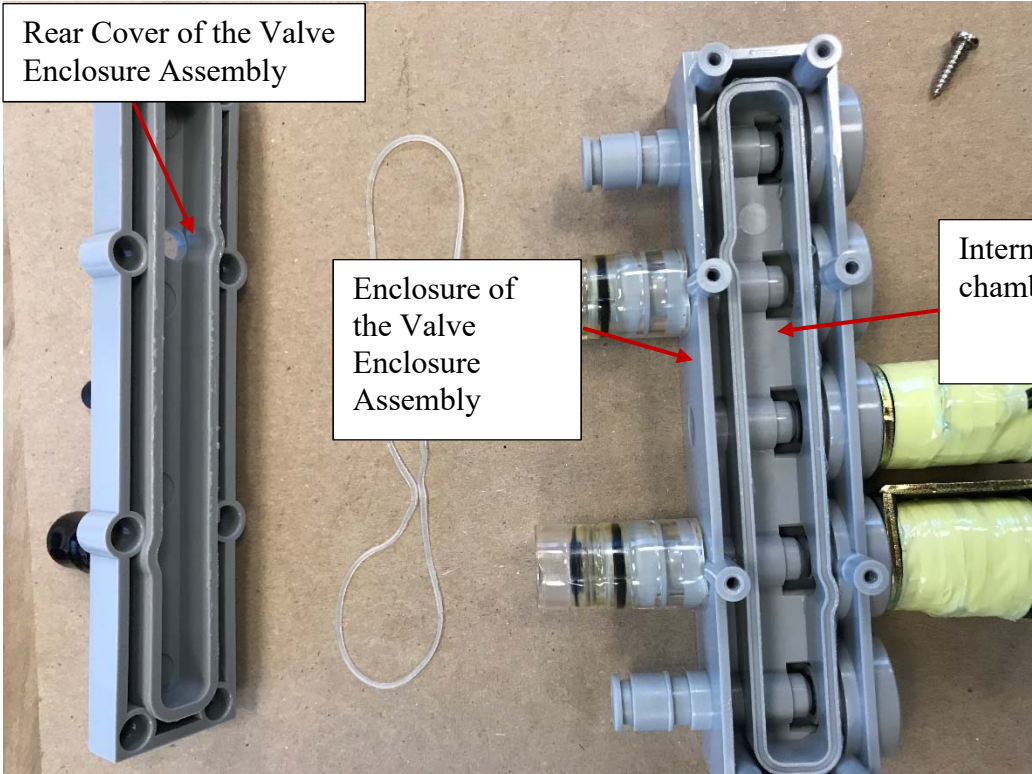
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>As seen in the photographs below, the enclosure of the Gen X's valve enclosure assembly is comprised of an enclosure and a rear cover.</p>  <p>(Photograph of the Gen 3 Arco)</p> <p>Furthermore, as seen in the photograph below showing a side perspective view of the Gen 3 Arco's enclosure, the Gen 3 Arco the internal chamber is shown enclosing a valve.</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1444 743 1692 951">Internal Chamber Enclosing a Valve</p> <p data-bbox="680 1289 1041 1321">(Photograph of Gen 3 Arco)</p> |

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

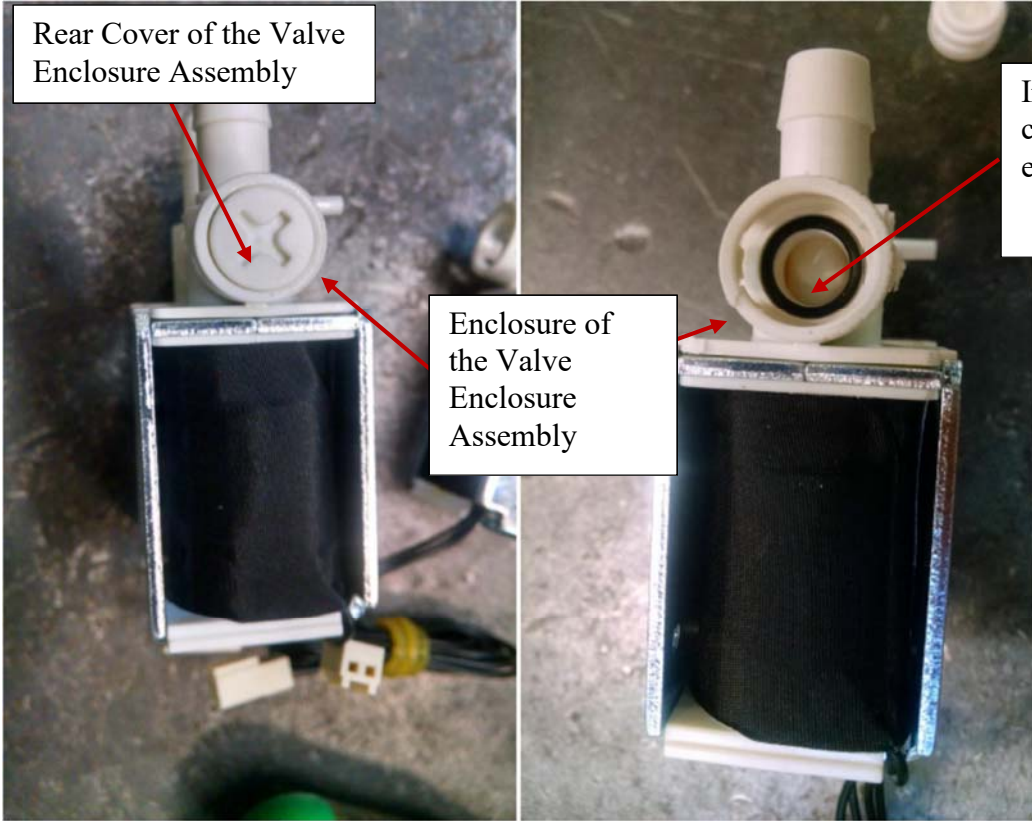
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>As seen in the photographs below, the enclosure of the Gen 3 Koge's valve enclosure assembly is comprised of an enclosure and a rear cover. The valve seal is contained within the enclosure, which shows how the enclosure and rear cover define an internal air chamber enclosing a valve.</p>  <p align="center">Enclosure Enclosure with Rear Cover Removed</p> <p>(Photograph of the Gen 3 Koge)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|--|---|
| <p>[20.1] an enclosure defining a substantially fluidly sealed air chamber and having at least one air inlet to the air chamber being fluidly coupled to the pump, the enclosure being formed of an enclosure portion and a rear cover portion, a flexible seal being compressively interposed between the enclosure portion and the rear cover portion to effect a substantially fluid tight seal therebetween;</p> | <p>Under the plain and ordinary meaning of the claim terms in light of the specification, the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers include an enclosure defining a substantially fluidly sealed air chamber and having at least one air inlet to the air chamber being fluidly coupled to the pump, the enclosure being formed of an enclosure portion and a rear cover portion, a flexible seal being compressively interposed between the enclosure portion and a rear cover portion to effect a substantially fluid tight seal therebetween.</p> <p>The Accused Products having a Gen 3 Arco air controller include a valve enclosure assembly comprised, in part, of an enclosure defining a substantially fluidly sealed air chamber that has at least one air inlet to the air chamber and which is fluidly coupled to the pump.</p> |

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

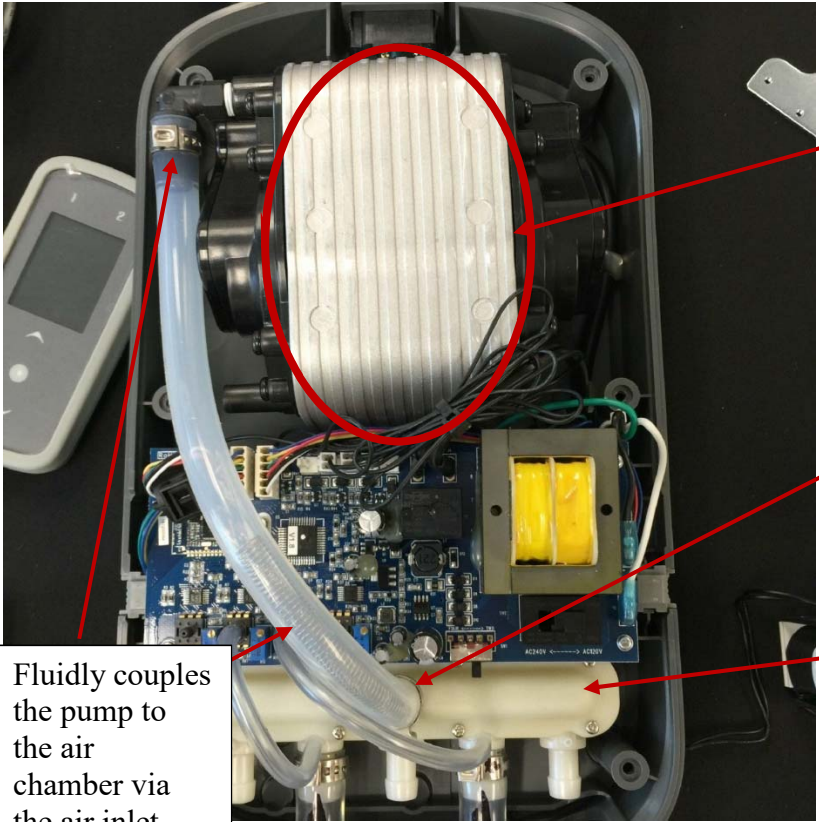
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen 3 Arco:</p>  <p>(Photograph of Gen 3 Arco)</p> <p>As seen in the photograph above, tubing connects the pump to the enclosure and to the air inlet to the air chamber of the enclosure. That is, the air inlet to the air chamber is fluidly coupled to the pump.</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1241 813 1419 862">Air Inlet</p> <p data-bbox="1539 521 1906 711">Enclosure, which defines a Substantially Fluidly Sealed Air Chamber</p> <p data-bbox="680 1089 1041 1122">(Photograph of Gen 3 Arco)</p> |

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

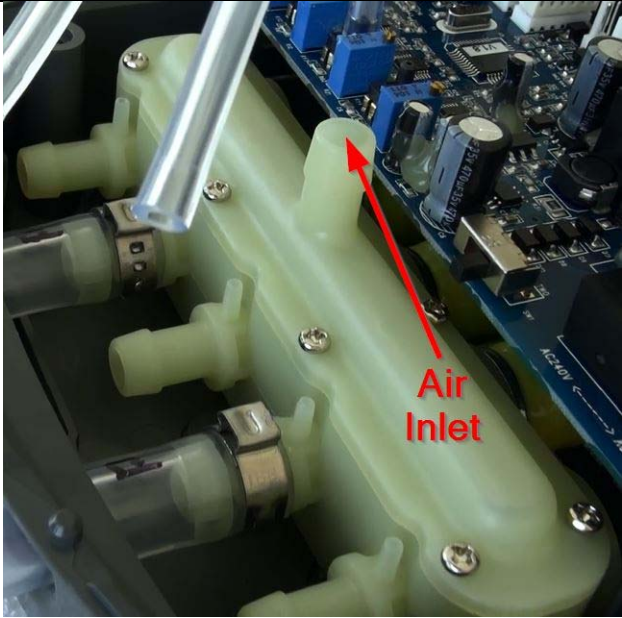
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photograph of Gen 3 Arco)</p> <p>As further seen from the photographs below, the enclosure defines an air chamber. The air chamber includes one or more O-rings, which assist in substantially fluidly sealing the air chamber.</p> |

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

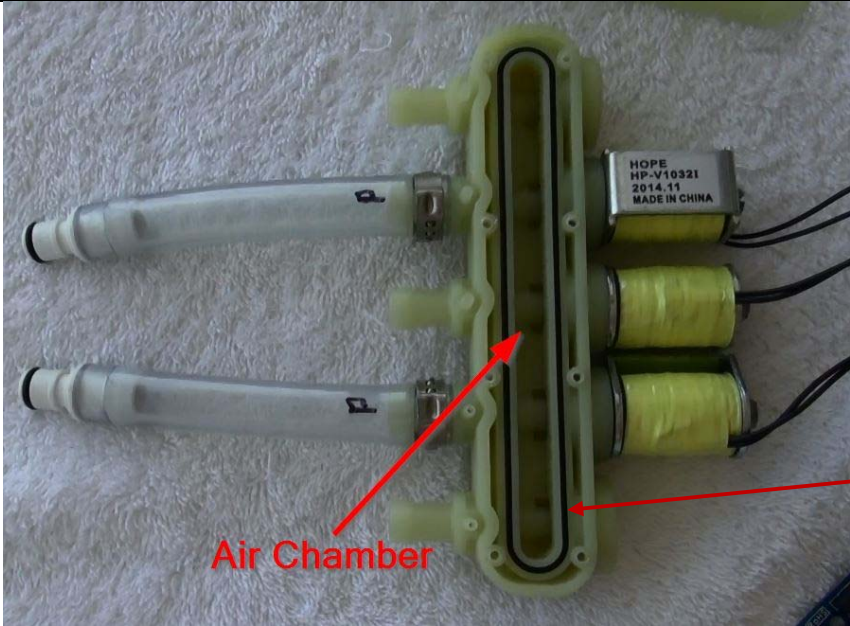
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="680 971 1871 1040">(Photograph of Gen 3 Arco's enclosure (depicted with the rear-cover removed for illustrative purposes).)</p> |

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

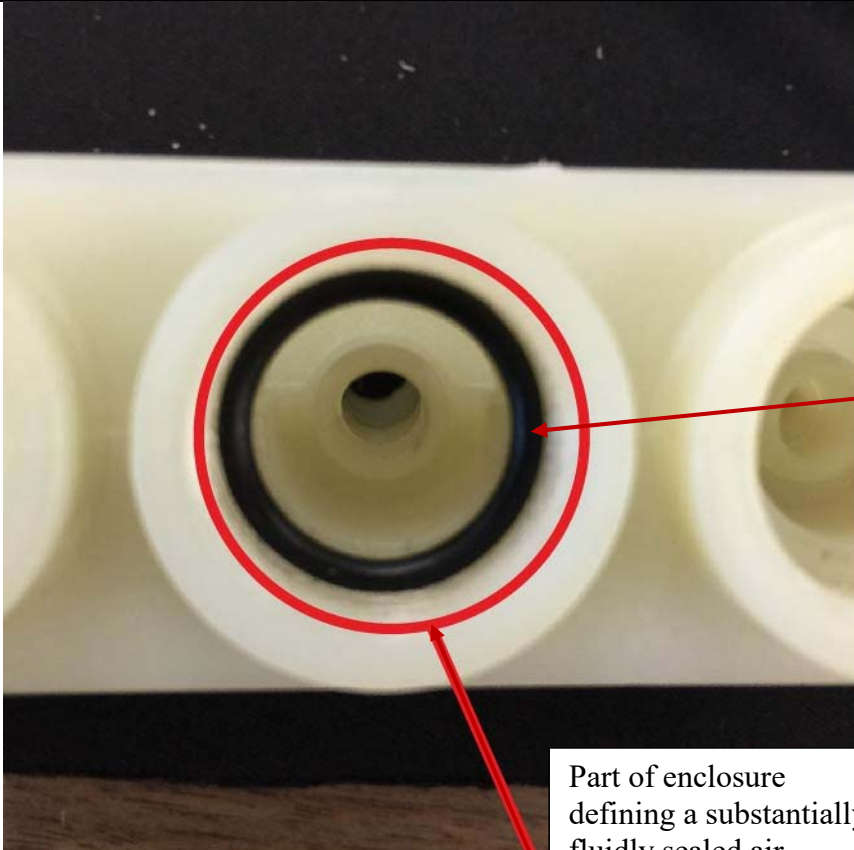
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1549 639 1919 829">O-ring, which assists in substantially fluidly sealing the air chamber</p> <p data-bbox="1226 1081 1591 1255">Part of enclosure defining a substantially fluidly sealed air chamber</p> <p data-bbox="680 1284 1654 1320">(Photograph of Gen 3 Arco's enclosure (depicted with solenoids removed).)</p> |

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

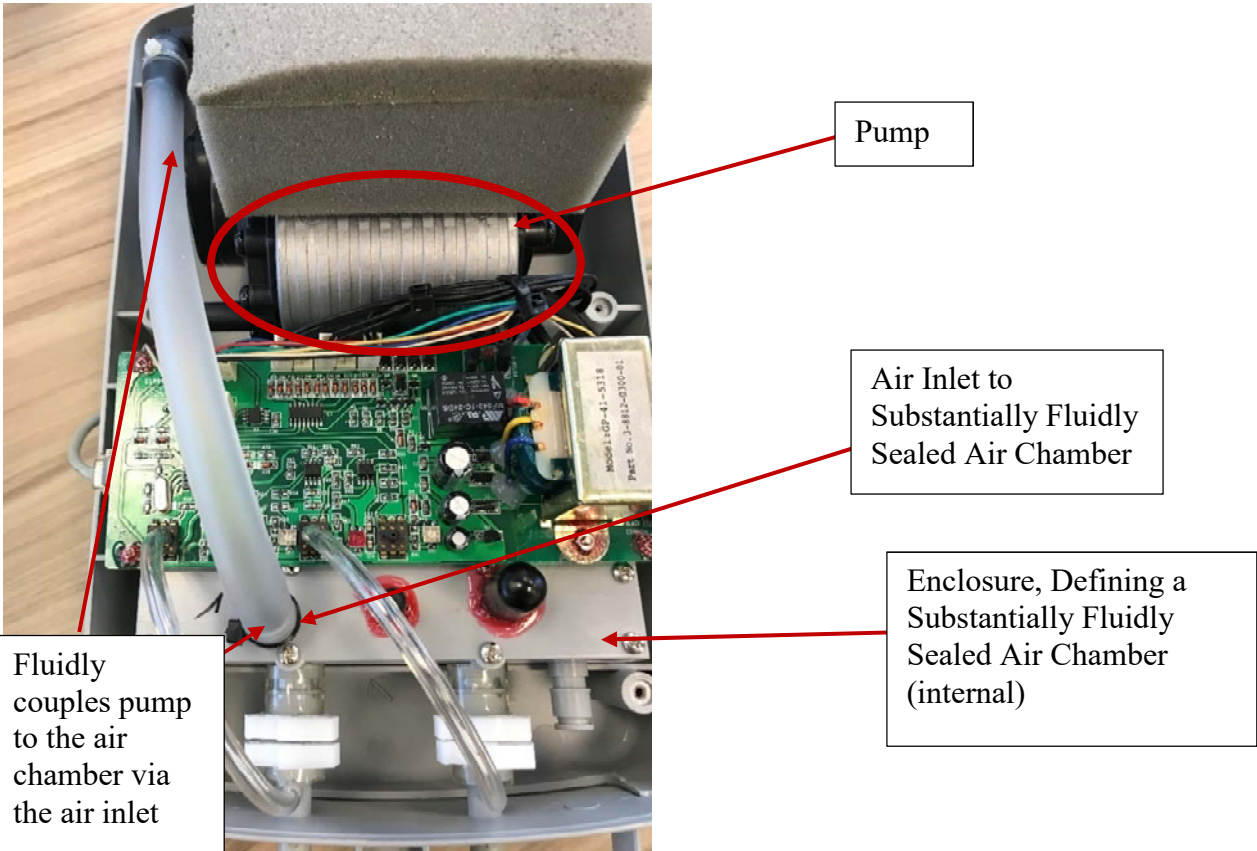
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The Accused Products having a Gen X air controller include a valve enclosure assembly comprised, in part, of an enclosure defining a substantially fluidly sealed air chamber that has at least one air inlet to the air chamber and which is fluidly coupled to the pump.</p> <p>Gen X:</p>  <p>(Photograph of Gen X)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>As seen in the photograph above, tubing connects the pump to the enclosure and to the air inlet to the air chamber of the enclosure. That is, the air inlet to the air chamber is fluidly coupled to the pump.</p> <div data-bbox="676 462 1251 1226" data-label="Image"> </div> <div data-bbox="1419 500 1780 690" data-label="Text"> <p>Air inlet to substantially fluidly sealed air chamber of the enclosure</p> </div> <p>(Photograph of Gen X)</p> <p>As further seen from the photographs below, the enclosure defines an air chamber. The air chamber includes one or more O-rings, which assist in substantially fluidly sealing the air chamber.</p> |

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

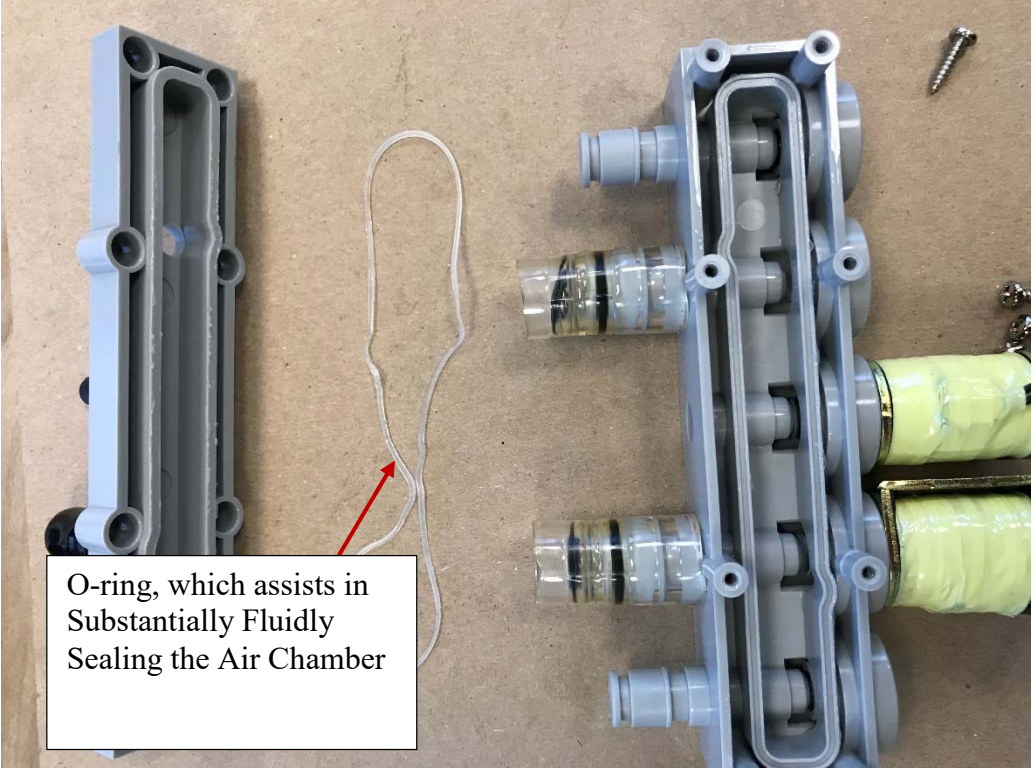
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="730 893 1096 1084">O-ring, which assists in Substantially Fluidly Sealing the Air Chamber</p> <p data-bbox="682 1112 1869 1185">(Photograph of Gen X's enclosure (depicted with the rear-cover and O-ring disassembled for illustrative purposes))</p> |

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

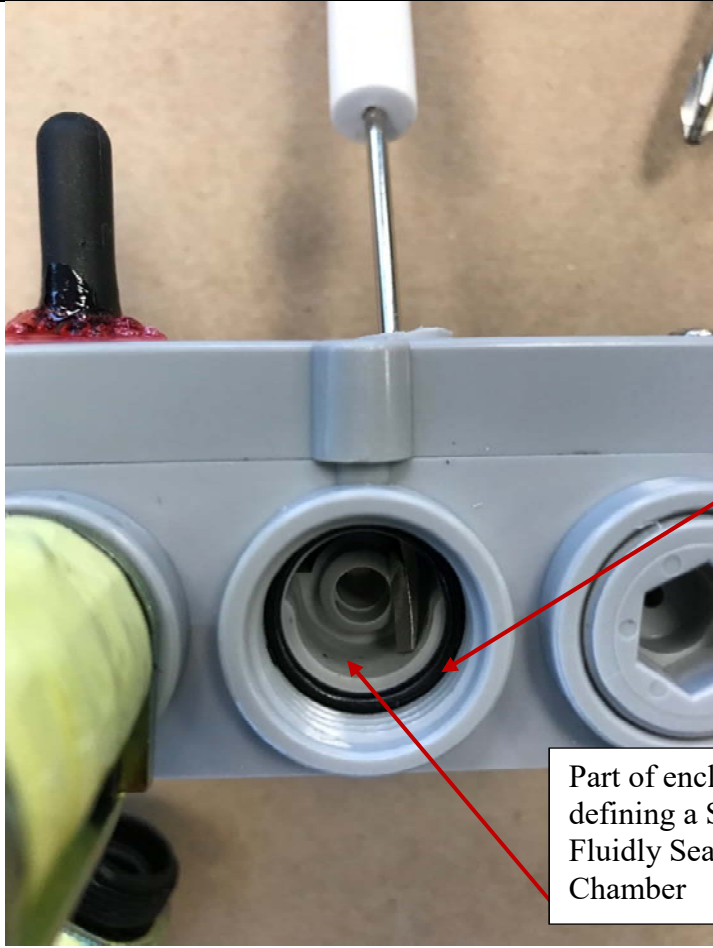
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1549 638 1919 829">O-ring, which assists in Substantially Fluidly Sealing the Air Chamber</p> <p data-bbox="1226 1081 1591 1256">Part of enclosure defining a Substantially Fluidly Sealed Air Chamber</p> <p data-bbox="680 1328 1598 1365">(Photograph of Gen X's enclosure (depicted with a solenoid removed).)</p> |

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

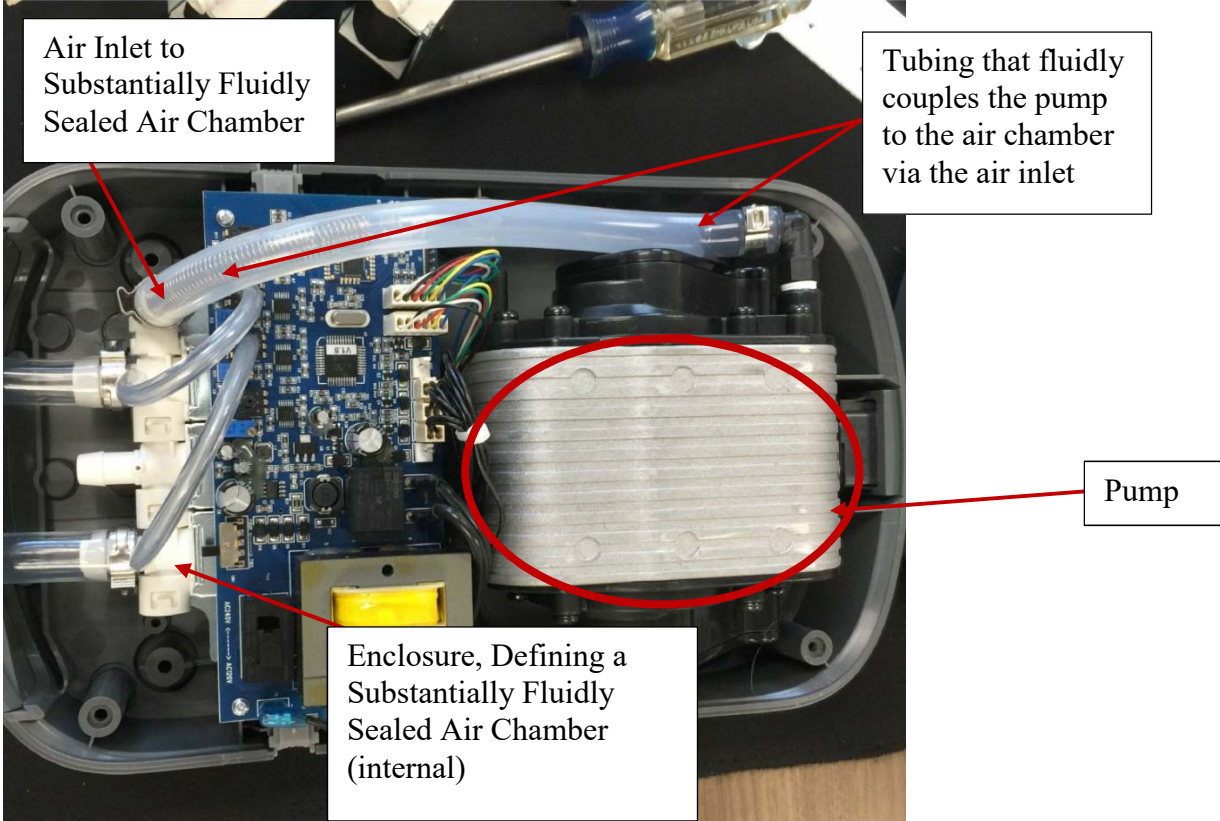
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The Accused Products having a Gen 3 Koge air controller include an enclosure defining a substantially fluidly sealed air chamber that has at least one air inlet to the air chamber, which is fluidly coupled to the pump.</p> <p>Gen 3 Koge:</p>  <p>(Photograph of Gen 3 Koge)</p> |

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

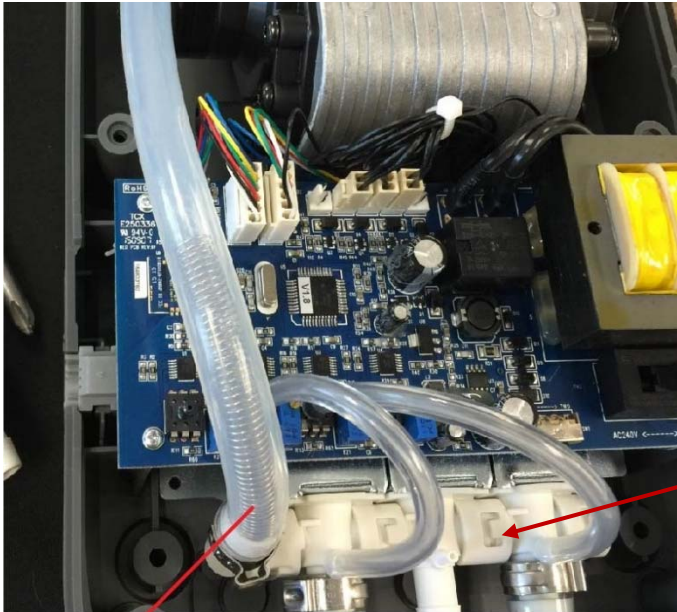
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>As seen in the photograph above, tubing connects the pump to the enclosure and to the air inlet to the air chamber of the enclosure. That is, the air inlet to the air chamber is fluidly coupled to the pump.</p>  <div data-bbox="1388 760 1757 954" style="border: 1px solid black; padding: 5px; margin-left: 20px;"> <p>Enclosure, which defines a Substantially Fluidly Sealed Air Chamber</p> </div> <p style="color: red; font-weight: bold; margin-left: 20px;">Inlet to substantially fluidly sealed enclosure</p> <p>(Photograph of Gen 3 Koge)</p> <p>As further seen from the photographs below, the enclosure defines an air chamber. The air chamber includes one or more interlocking connectors, which assist in substantially fluidly sealing the air chamber.</p> |

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

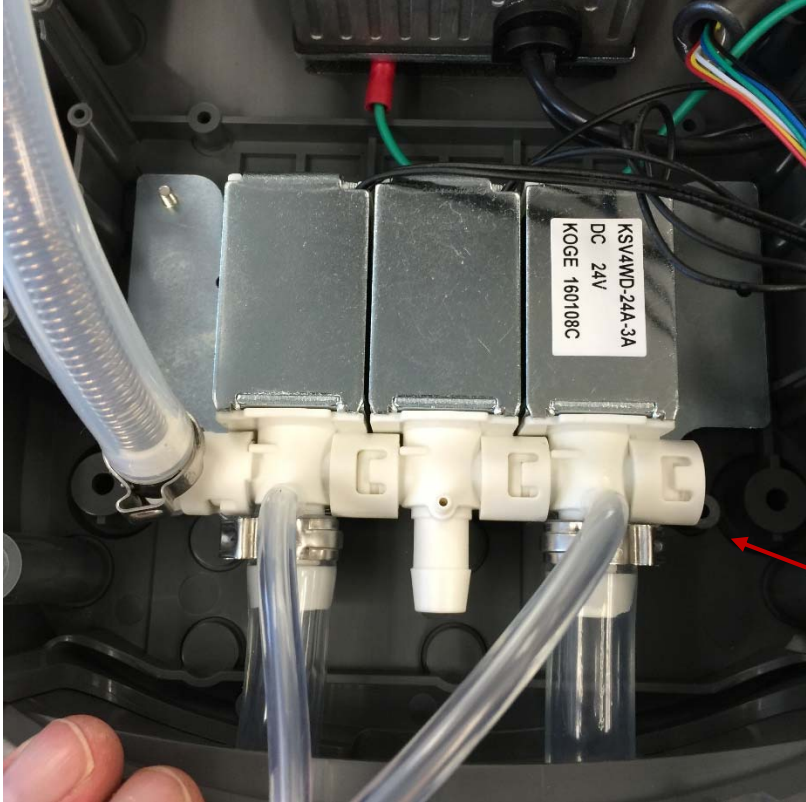
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1570 870 1934 1060">Enclosure defining a substantially fluidly sealed air chamber</p> <p data-bbox="680 1156 1045 1190">(Photograph of Gen 3 Koge)</p> |

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

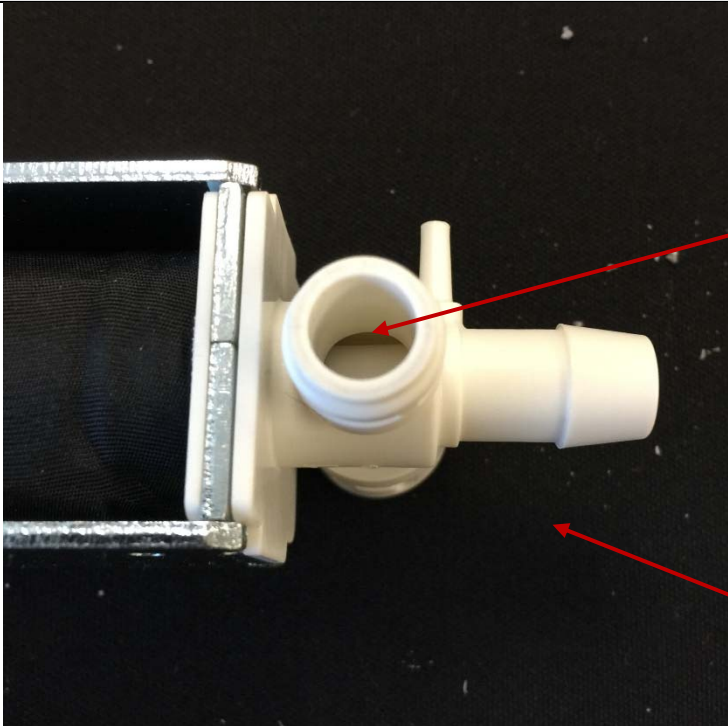
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1440 474 1818 620">Substantially Fluidly Sealed Air Chamber</p> <p data-bbox="1524 902 1787 1024">Enclosure</p> <p data-bbox="680 1068 1902 1105">(Photograph of Gen 3 Koge's enclosure (depicted detached from other enclosure components).)</p> <p data-bbox="680 1203 1997 1414">When the Gen 3 and Gen X air controllers inflate the one or more air bladders, the pump, tubing that connects the pump to the air inlet, air chamber, and tubing connecting the air chamber to the one or more air bladders creates a substantially fluidly sealed environment substantially fluidly sealing the air chamber. That is, the enclosure contains several fluid tight seals and the tubing connecting the air bladders and pump to the enclosure creates a fluidly sealed environment such that the air chamber defined by the enclosure is substantially fluidly sealed. To the extent this limitation is not literally</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>present the limitation is met under the doctrine of equivalents because the substantially fluidly sealed environment performs substantially the same function as a substantially sealed air chamber in substantially the same way and to obtain the substantially same result. Accordingly, the air chamber defined by the enclosure meets the substantially fluidly sealed limitation.</p> <p>The Accused Products having a Gen 3 Arco air controller further include an enclosure being formed of an enclosure portion and a rear cover portion, a flexible seal being compressively interposed between the enclosure portion and a rear cover portion to effect a substantially fluid tight seal therebetween.</p> <p>As seen in the photographs below, the Gen 3 Arco's enclosure of the valve enclosure assembly is comprised of an enclosure portion and a rear cover portion. Furthermore, a flexible seal is compressively interposed between the enclosure portion and the rear cover portion, thereby creating a substantially fluid tight seal between the enclosure portion and the rear cover portion.</p> |

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

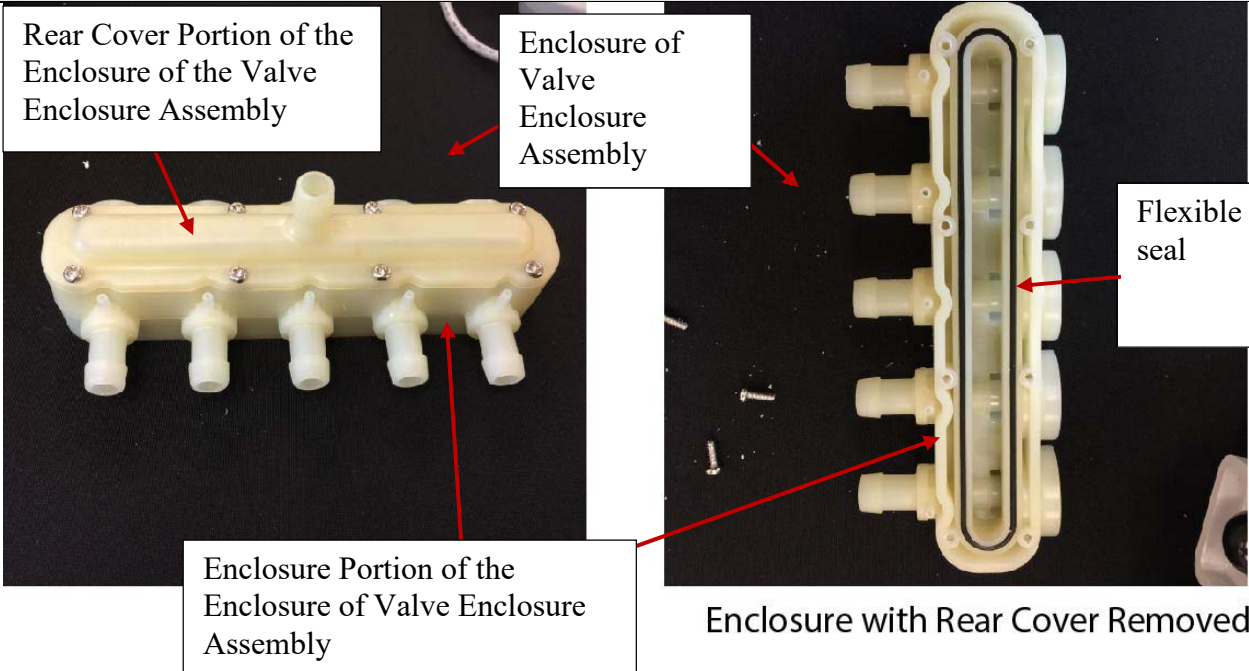
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>(Photograph of the Gen 3 Arco)</p> <p>The Accused Products having a Gen X air controller further include an enclosure being formed of an enclosure portion and a rear cover portion, a flexible seal being compressively interposed between the enclosure portion and a rear cover portion to effect a substantially fluid tight seal therebetween.</p> <p>As seen in the photographs below, the Gen X's enclosure of the valve enclosure assembly is comprised of an enclosure portion and a rear cover portion. Furthermore, a flexible seal is compressively interposed between the enclosure portion and the rear cover portion, thereby creating a substantially fluid tight seal between the enclosure portion and the rear cover portion.</p> |

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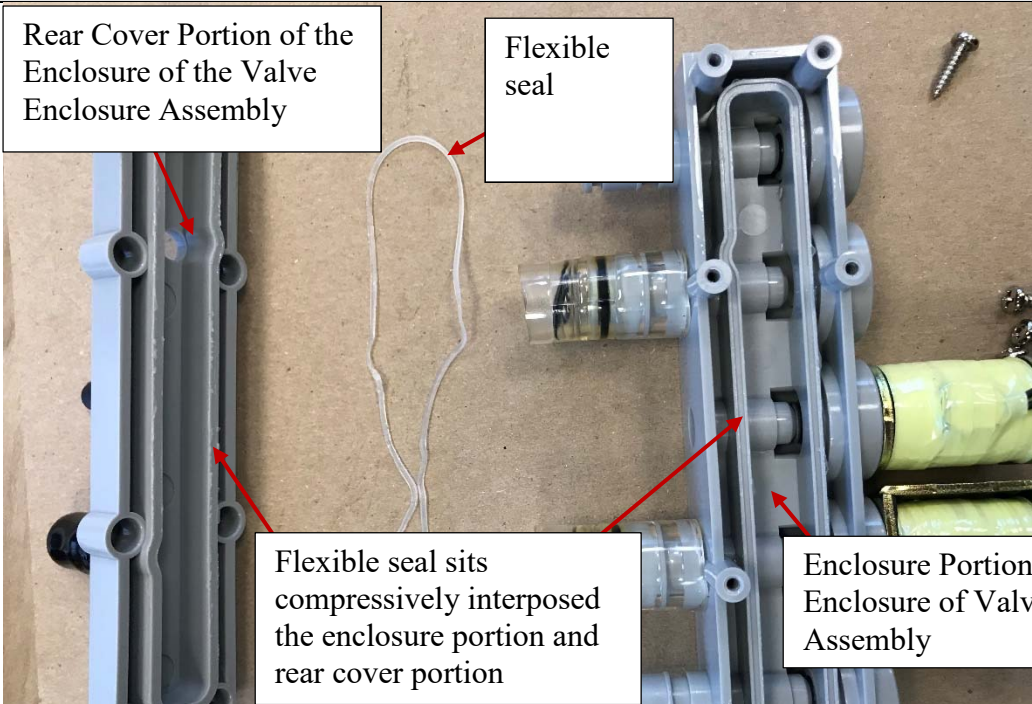
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photograph of the Gen X)</p> <p>As seen in the photographs below, the Gen 3 Koge's enclosure of the valve enclosure assembly is comprised of an enclosure portion and a rear cover portion. Furthermore, a flexible seal is compressively interposed between the enclosure portion and the rear cover portion, thereby creating a substantially fluid tight seal between the enclosure portion and the rear cover portion.</p> |

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

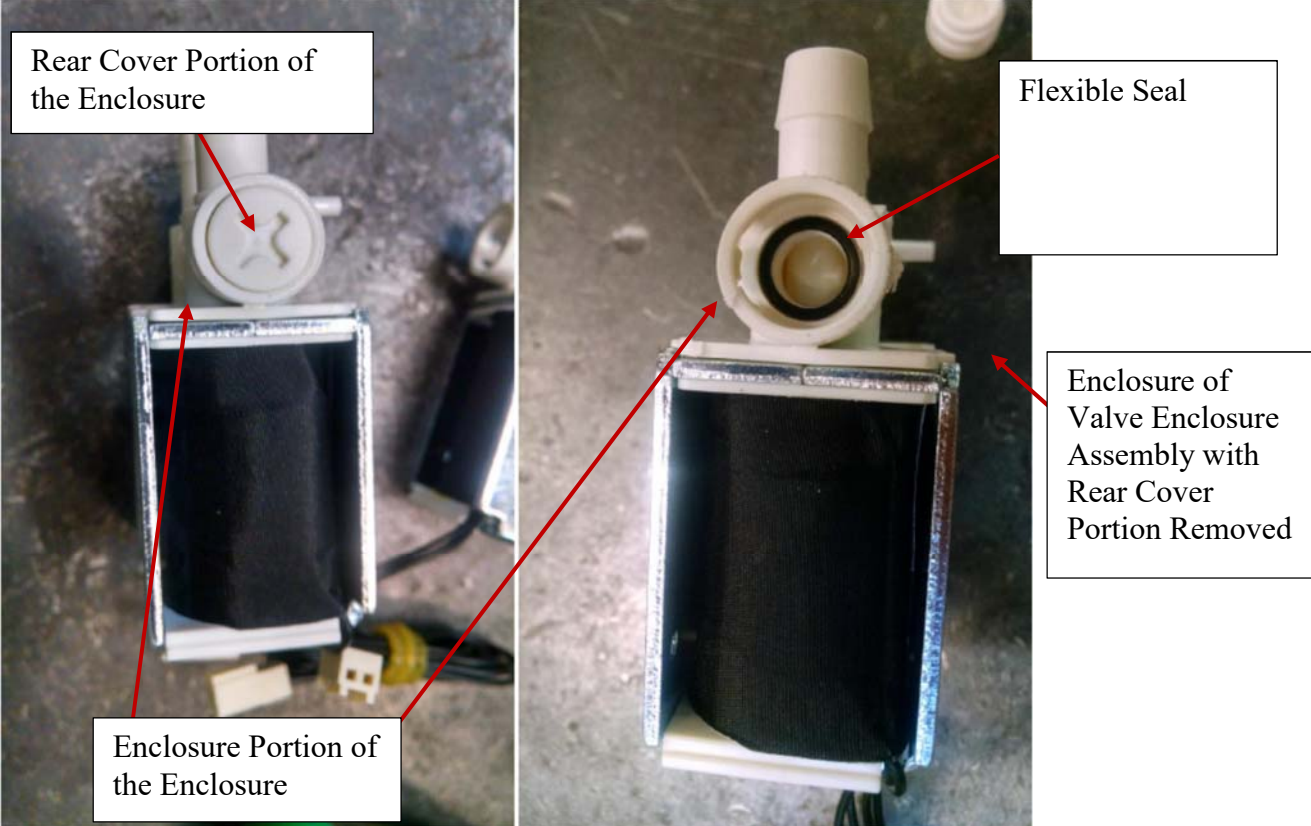
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---|---|
| |  <p data-bbox="693 373 1050 462">Rear Cover Portion of the Enclosure</p> <p data-bbox="1680 397 1953 592">Flexible Seal</p> <p data-bbox="1722 690 1984 909">Enclosure of Valve Enclosure Assembly with Rear Cover Portion Removed</p> <p data-bbox="777 1055 1071 1153">Enclosure Portion of the Enclosure</p> <p data-bbox="682 1177 1092 1209">(Photograph of the Gen 3 Koge)</p> |
| <p data-bbox="105 1274 630 1412">[20.2] two or more valves being in fluid communication with both the exterior of the enclosure and with the air chamber; and</p> | <p data-bbox="682 1274 1984 1380">Under the plain and ordinary meaning of the claim terms in light of the specification, the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers include two or more valves being in fluid communication with both the exterior of the enclosure and with the air chamber.</p> |

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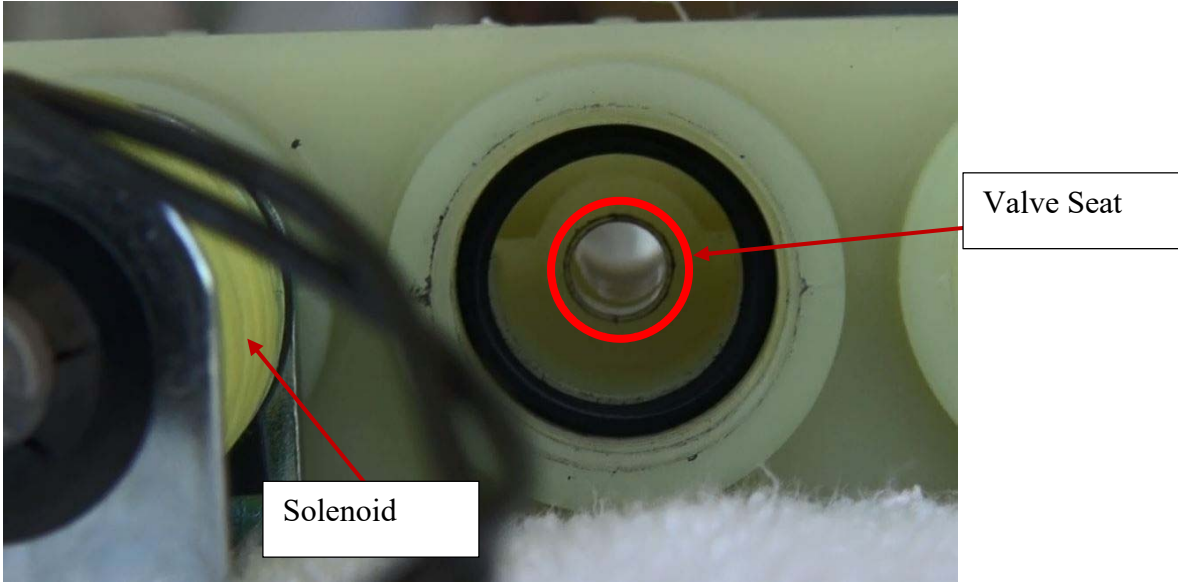
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>The Accused Products having a Gen 3 Arco air controller include at least two valves that are capable of being in fluid communication with both the exterior of the enclosure and with the air chamber. Each valve is created by a valve seat and the plunger of a solenoid. The valve seat is part of the mold that creates the enclosure of the valve enclosure assembly. The plunger of the solenoid is inserted into the enclosure of the valve enclosure assembly such that the plunger is capable of contacting the valve seat to close the valve.</p>  <p>(Photograph of Gen 3 Arco's valve enclosure assembly with a solenoid removed)</p> |

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

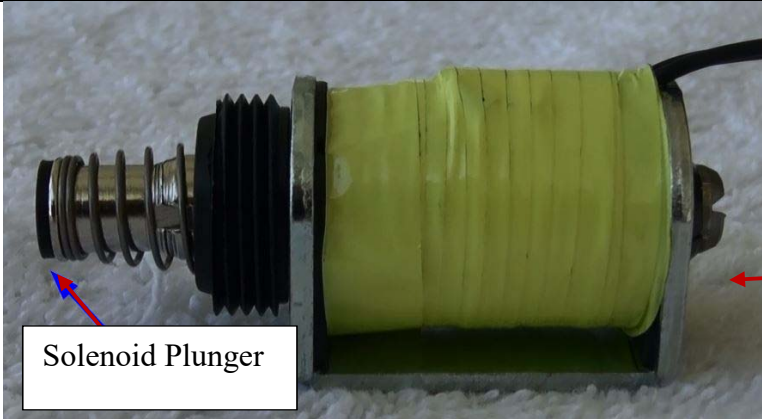
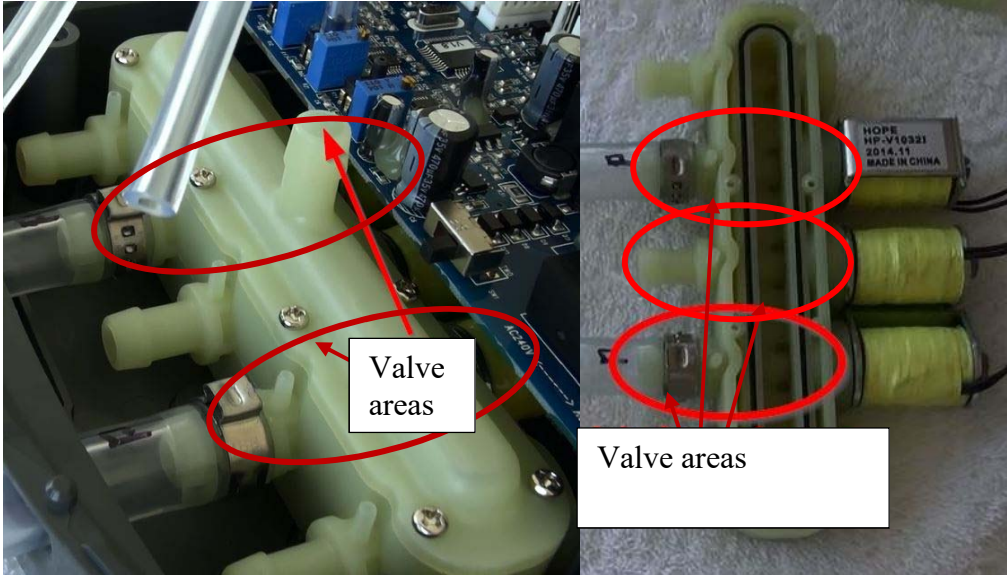
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="680 766 1591 802">There are at least two valves, the areas of which are highlighted below:</p>  <p data-bbox="680 1377 1054 1408">(Photographs of Gen 3 Arco)</p> |

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

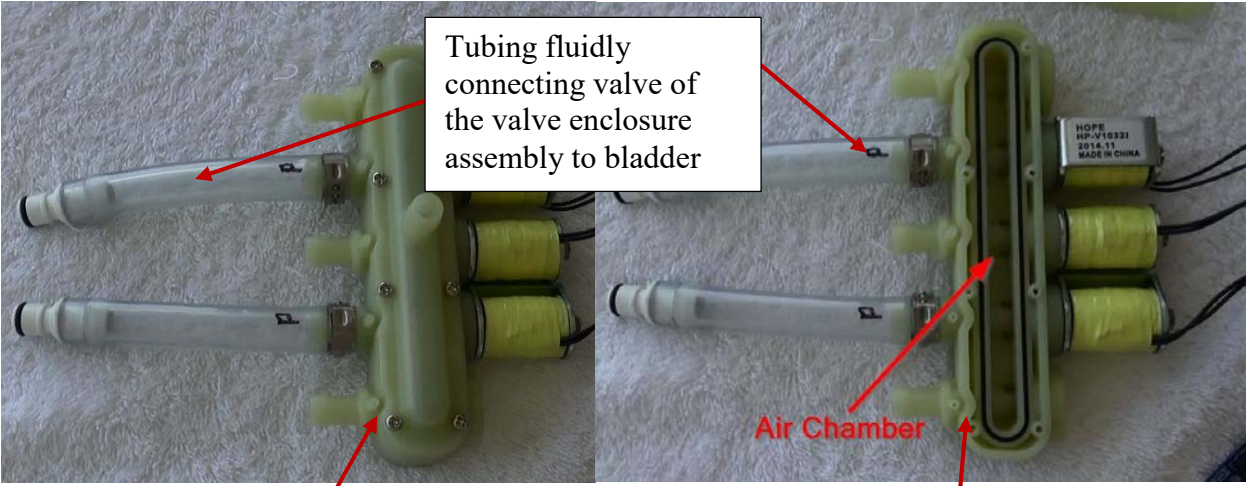
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The valves are fluidly coupled to the bladder(s) of an air inflatable mattress. For example, as seen in the photographs below, tubing fluidly couples the valve enclosure assembly to one or more bladders. That is, air can flow from the valve through the tubing towards the bladder. Accordingly, the valve is capable of being in fluid communication with the exterior of the enclosure.</p>  <div data-bbox="682 998 1318 1075" style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> <p align="center">Enclosure of the Valve Enclosure Assembly (Photographs of Gen 3 Arco)</p> </div> <div data-bbox="1501 998 1890 1133" style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> <p align="center">Enclosure of Valve Enclosure Assembly (rear-cover removed)</p> </div> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="1635 505 1816 604">Valve Seat of Valve</p> <p data-bbox="680 837 1041 873">(Photograph of Gen 3 Arco)</p> <p data-bbox="680 927 1944 1032">Also, when the valve is open, air (represented by blue arrows) can pass from the air chamber of the enclosure of the valve enclosure assembly through the valve. Accordingly, the valve is capable of being in fluid communication with the air chamber.</p> |

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

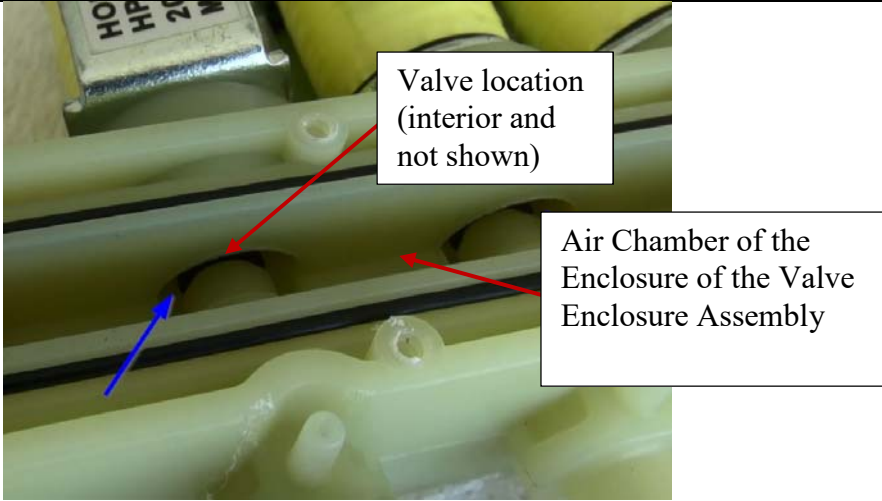
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photograph of Gen 3 Arco)</p> <p>The Accused Products having a Gen X air controller include at least two valves that are capable of being in fluid communication with both the exterior of the enclosure and with the air chamber. Each valve is created by a valve seat and the plunger of a solenoid. The valve seat is part of the mold that creates the enclosure of the valve enclosure assembly. The plunger of the solenoid is inserted into the enclosure of the valve enclosure assembly such that the plunger is capable of contacting the valve seat to close the valve.</p> |

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

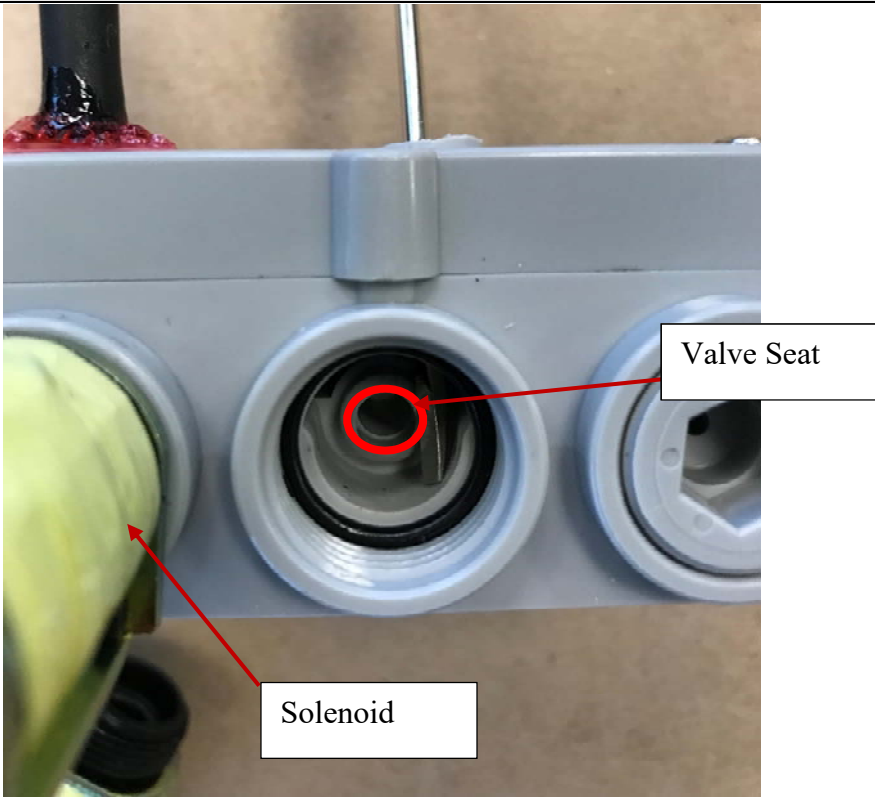
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>(Photograph of Gen X's valve enclosure assembly with a solenoid removed)</p> |

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

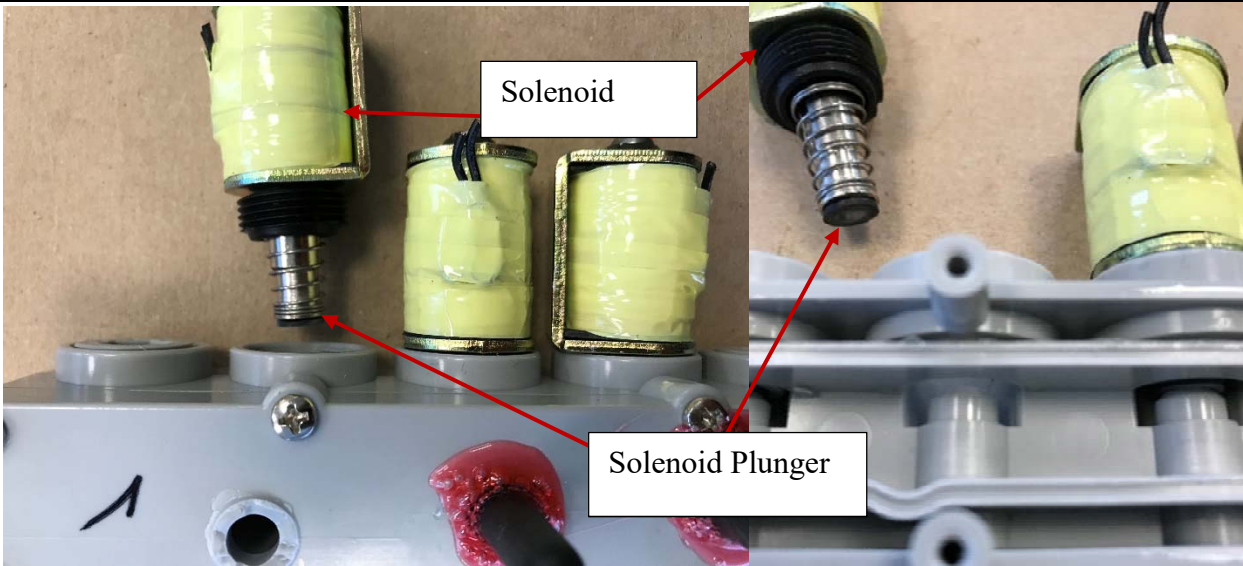
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photographs of Gen X)</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>There are at least two valves, the areas of which are highlighted below:</p>  <p>(Photographs of Gen X)</p> <p>The valves are fluidly coupled to the bladder(s) of an air inflatable mattress. For example, as seen in the photographs below, tubing fluidly couples the valve enclosure assembly to one or more bladders. That is, air can flow from the valve through the tubing towards the bladder. Accordingly, the valve is capable of being in fluid communication with the exterior of the enclosure.</p> |

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

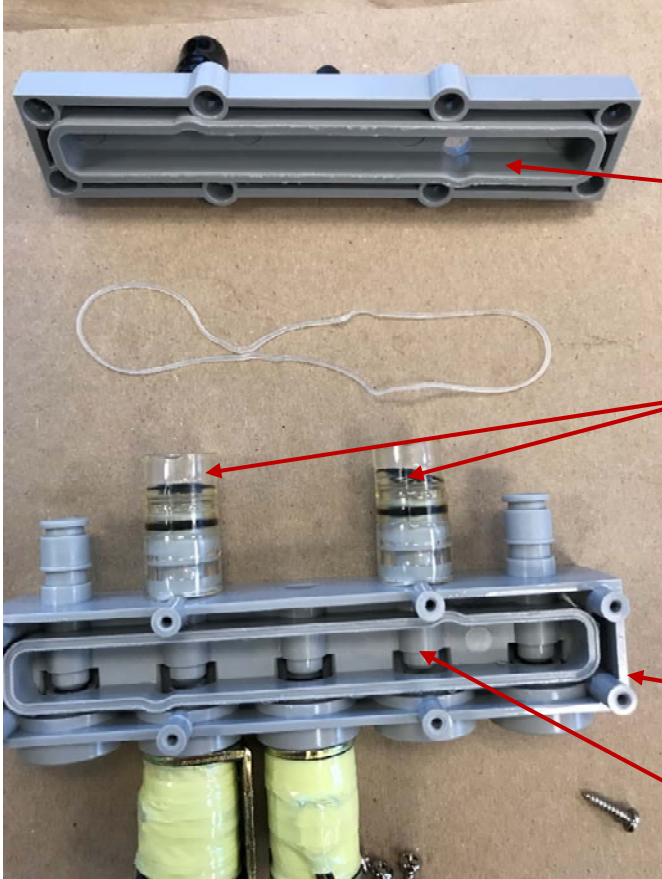
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>(Photographs of Gen X)</p> <p>Also, when the valve is open, air (represented by blue arrows) can pass from the air chamber of the enclosure of the valve enclosure assembly through the valve. Accordingly, the valve is capable of being in fluid communication with the air chamber.</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="1381 581 1608 756">Air Chamber of the Valve Enclosure Assembly</p> <p data-bbox="680 1198 978 1230">(Photograph of Gen X)</p> |

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

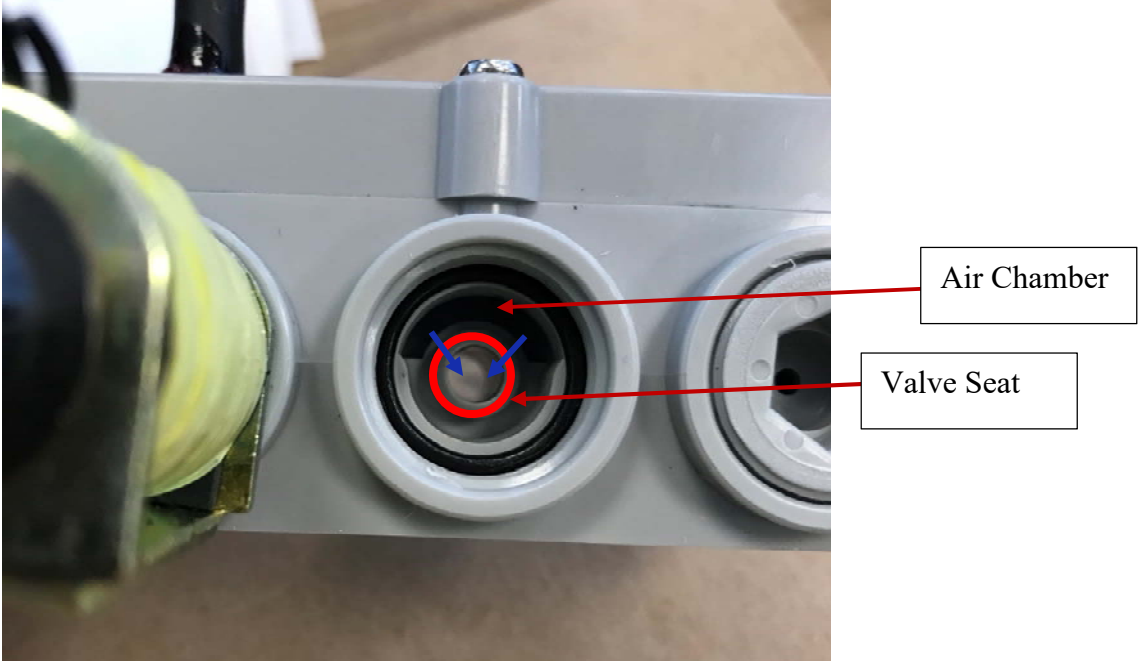
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>(Photograph of Gen X) (Photograph of Gen X)</p> <p>The Accused Products having a Gen 3 Koge air controller include at least two valves that are capable of being in fluid communication with both the exterior of the enclosure and with the air chamber.</p> <p>As shown below, the enclosure of the valve enclosure assembly of the Gen 3 Koge includes a plurality of valves fluidly connected to the air chamber. The photograph below shows a valve comprised of a valve seat (part of the mold of the enclosure) and a solenoid plunger of a solenoid inserted into the enclosure. The air chamber passes around a valve tube and can flow towards the valve. When the valve is open, air can flow down the valve tube to an exterior of the enclosure.</p> |

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

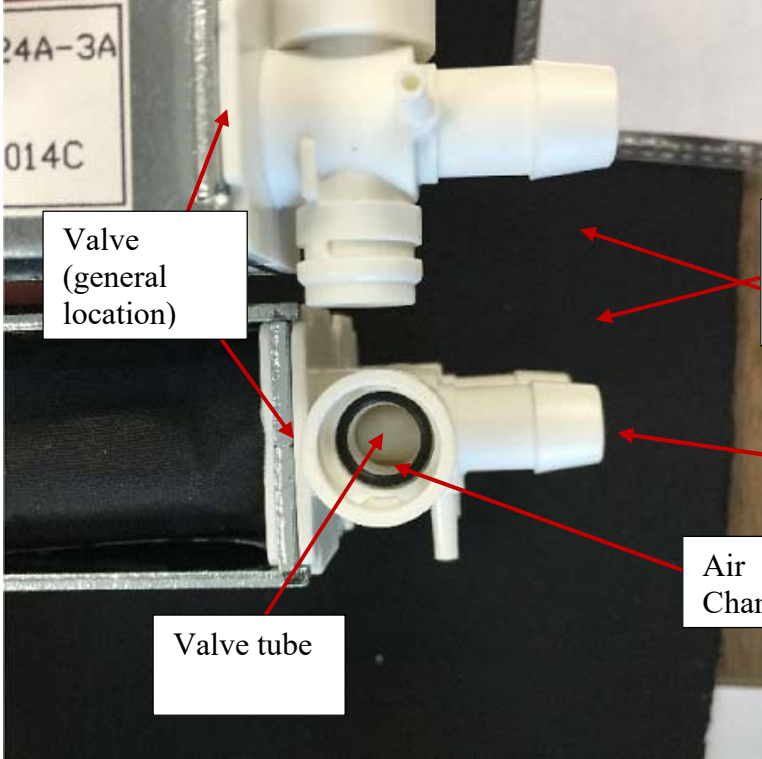
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>(Photograph of Gen 3 Koge)</p> |

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

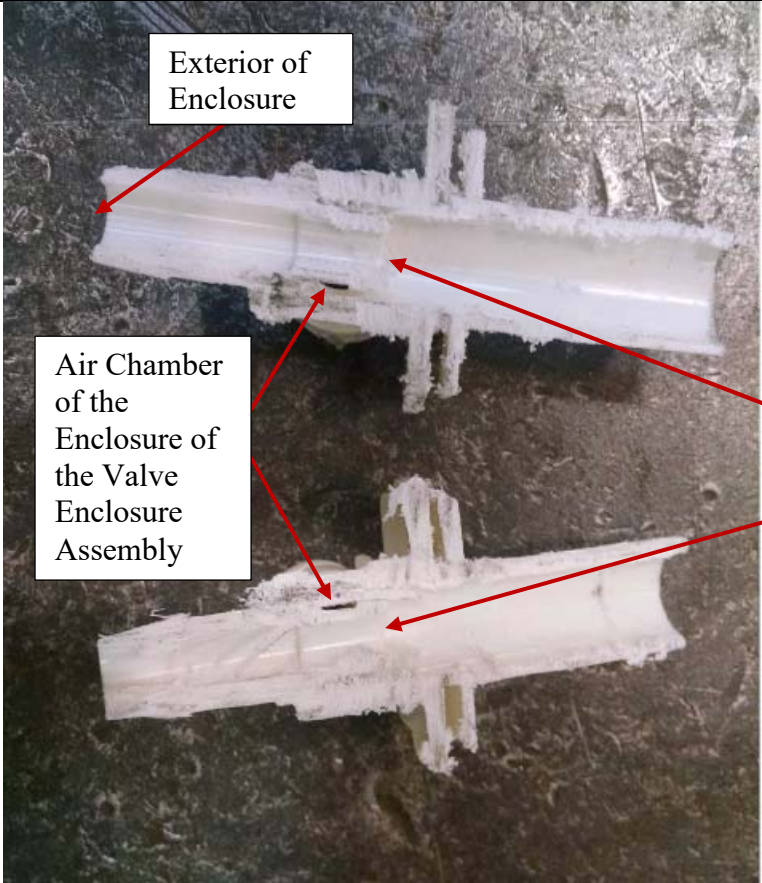
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photograph of Gen 3 Koge)</p> <p>The solenoid is seen in a partially deconstructed state below. The solenoid includes a solenoid plunger within the enclosure that is capable of connecting or coupling to the valve seat.</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| |  <p data-bbox="1608 391 1808 477">Solenoid</p> <p data-bbox="680 1013 1050 1049">(Photograph of Gen 3 Koge)</p> |

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

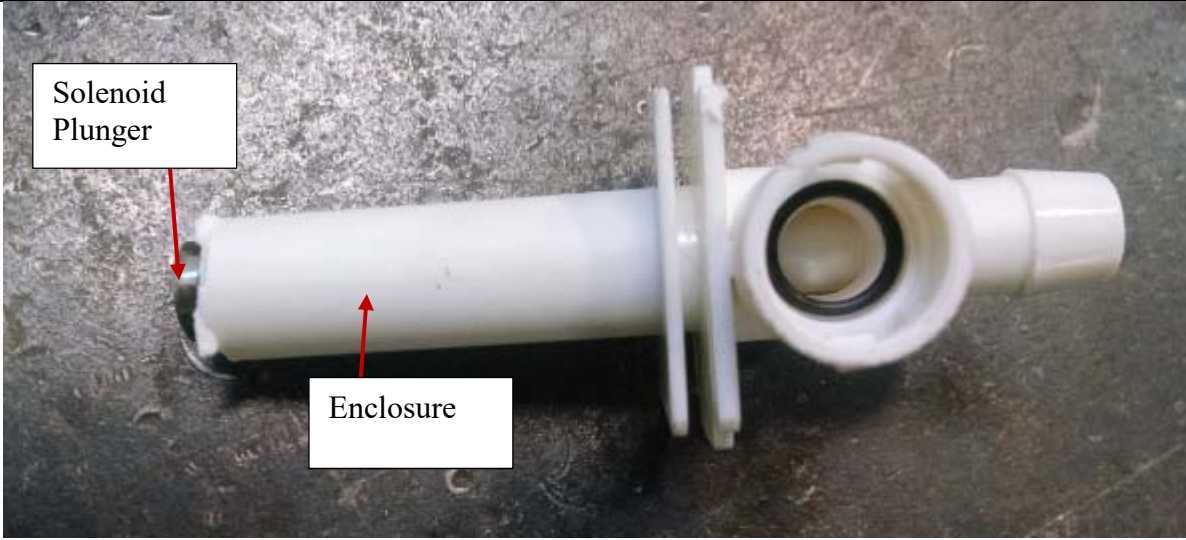
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photograph of Gen 3 Koge)</p> <p>In addition, the valves are fluidly coupled to the bladder of an air inflatable mattress. For example, as seen in the photographs below, tubing fluidly couples the valve enclosure assembly to one or more bladders. Accordingly, the valves are capable of being in fluid communication with an exterior of the enclosure.</p> |

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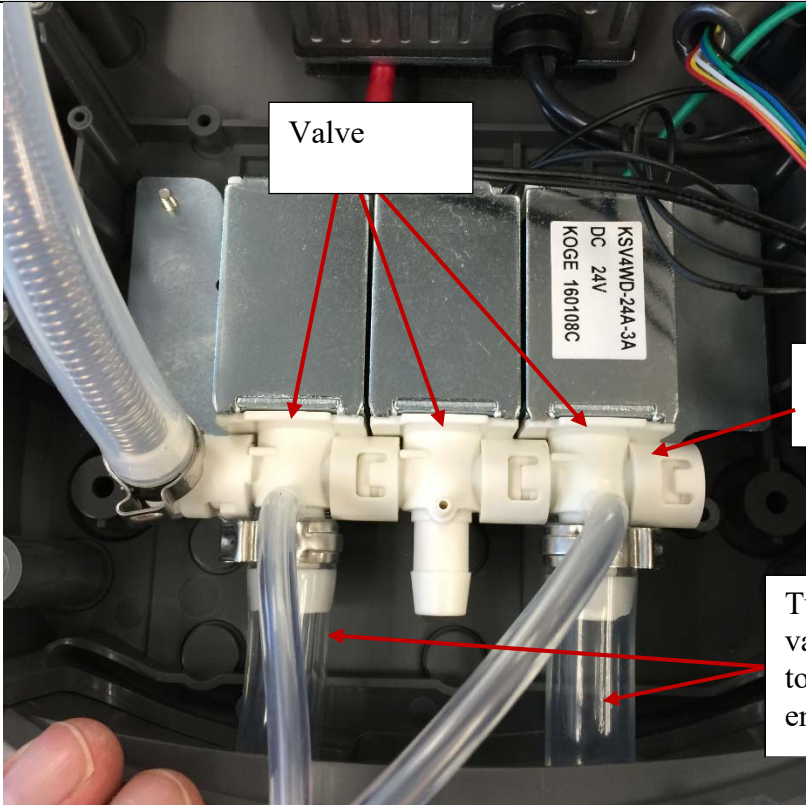
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photographs of Gen 3 Koge)</p> <p>When the valve is open, air can pass to/from the air chamber of the enclosure of the valve enclosure assembly through the valve and through the tubing fluidly connecting the valve enclosure assembly to the bladder(s) of the air inflatable mattress. When the valve is closed, air from the air chamber cannot pass through the valve. Thus, the valves are capable of being in fluid communication with the air chamber and an exterior of the enclosure.</p> |

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

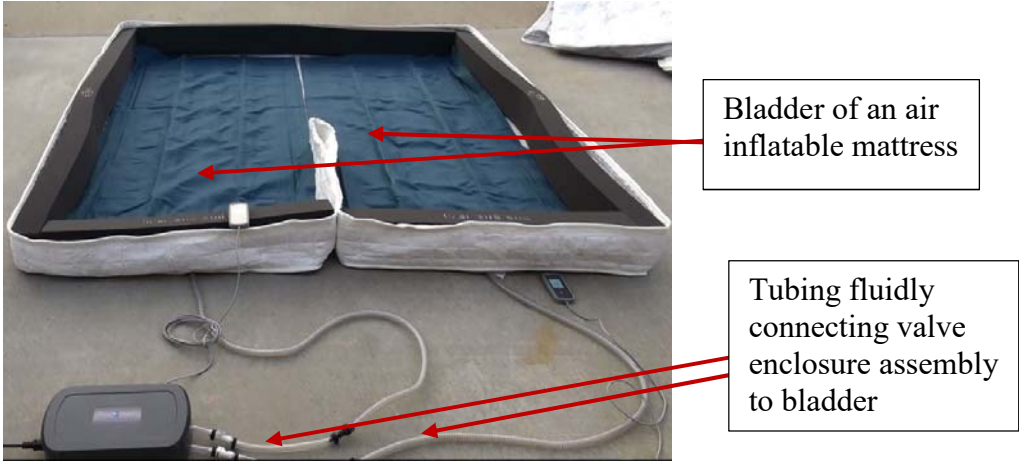
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <p>The photographs below show examples of how the Gen 3 and Gen X air controllers are configured to connect to air bladder(s) of an inflatable mattress.</p>  <p>(exemplary photo of air mattress system)</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---|---|
| |  <p>(Photograph of medical air mattress system)</p> |
| <p>[20.3] pressure monitor means including a sensor being operably coupled to the processor and being in fluid communication with the at least one bladder through a pressure monitoring port defining an opening through the enclosure and into an interior of the air chamber, the pressure sensor configured</p> | <p>The “pressure monitor means” is a means-plus-function limitation subject to pre-AIA 35 U.S.C. § 112, ¶ 6. The function is continuously monitoring the pressure in the at least one bladder. The structure is a port fluidly coupled to the interior of the valve enclosure assembly that is designed to receive a tube, a pressure sensor, and a tube connected to the port and to the pressure sensor, and equivalents thereof. Under this construction, and where the other claim terms are given their plan and ordinary meaning in light of the specification, the Gen 3 Arco, Gen X, and Gen 3 Koge Air Controllers include a pressure monitor means including a sensor being operably coupled to the processor and being in fluid communication with the at least one bladder through a pressure</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|--|---|
| <p>for continuously monitoring the pressure in the at least one bladder during an inflate/deflate cycle.</p> | <p>monitoring port defining an opening through the enclosure and into an interior of the air chamber, the pressure sensor configured for continuously monitoring the pressure in the at least one bladder during an inflate/deflate cycle.</p> <p>The Accused Products having a Gen 3 Arco air controller include pressure monitor means including a sensor operably coupled to the processor. Specifically, the valve enclosure assembly of the Gen 3 Arco includes a pressure monitoring port, which is capable of being in fluid communication with the interior of the enclosure of the valve enclosure assembly.</p> |

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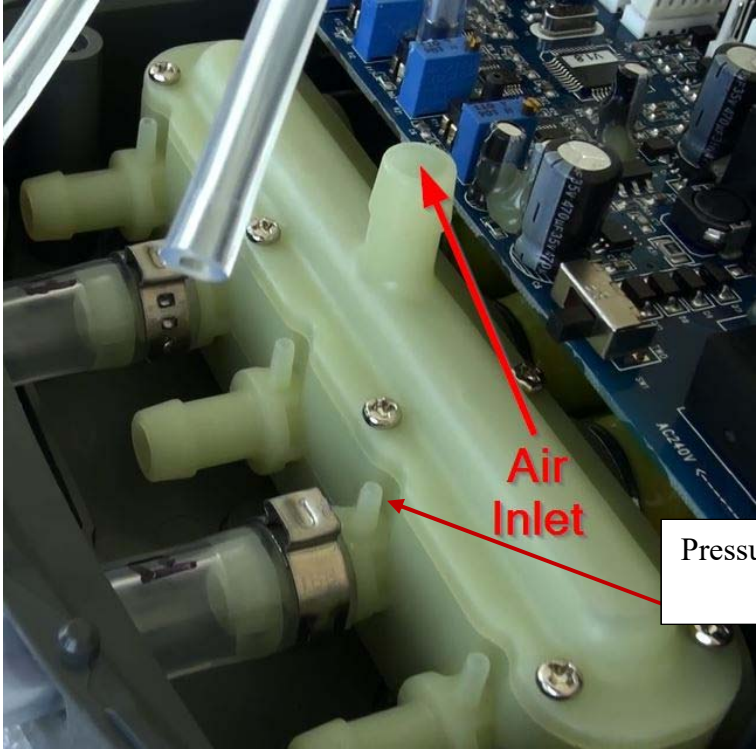
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>Gen 3 Arco:</p>  <p>(Photograph of Gen 3 Arco)</p> <p>As seen, the pressure monitoring port defines an opening into the enclosure. This opening continues through the enclosure and into the interior of the air chamber.</p> <p>As seen in the photograph below, a tube is connected to the pressure monitoring port. The tube is also connected to a pressure sensor. In addition, and as discussed above, the pressure in the one or more air</p> |

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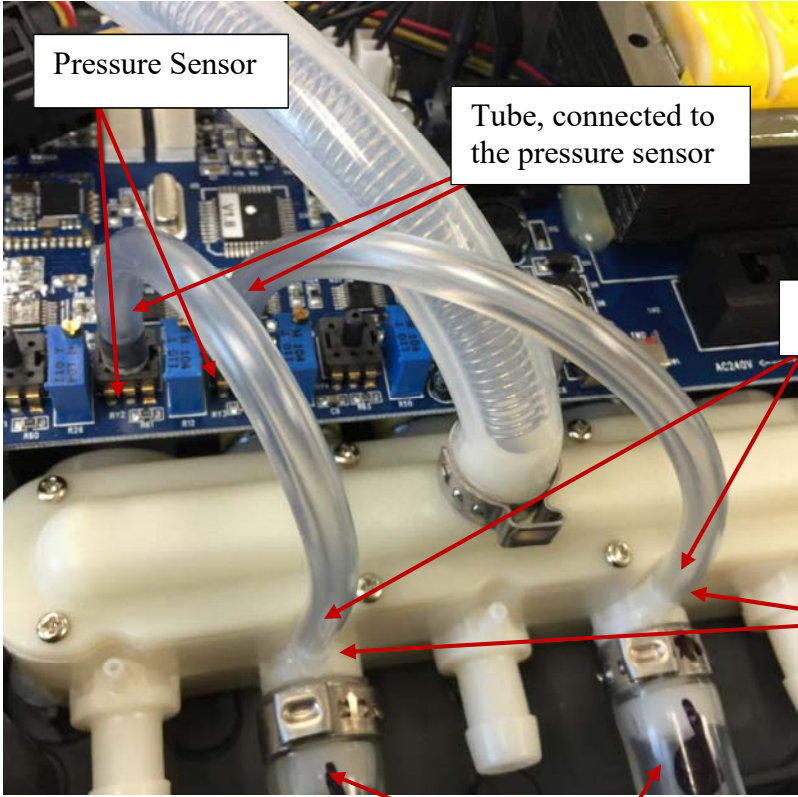
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>bladders is conveyed to the enclosure of the valve enclosure assembly via tubing that fluidly couples the valve enclosure assembly to the air bladder(s). The bladder pressure is conveyed to the pressure sensor from the pressure monitoring port.</p>  <p>The photograph shows a blue printed circuit board (PCB) with a pressure sensor mounted on it. Two clear plastic tubes are connected to the sensor. One tube is connected to a port on a white valve enclosure assembly, and the other tube is connected to a pressure monitoring port on the same assembly. Red arrows point from text labels to these components.</p> <p>Pressure Sensor</p> <p>Tube, connected to the pressure sensor</p> <p>Tube, connected to the port</p> <p>Pressure Monitoring Port in fluid communication with the interior of the enclosure of the valve enclosure assembly</p> <p>(Photograph of the Gen 3 Arco)</p> <p>Tubing Fluidly Coupling the Valve Enclosure Assembly to an Air Bladder</p> |

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

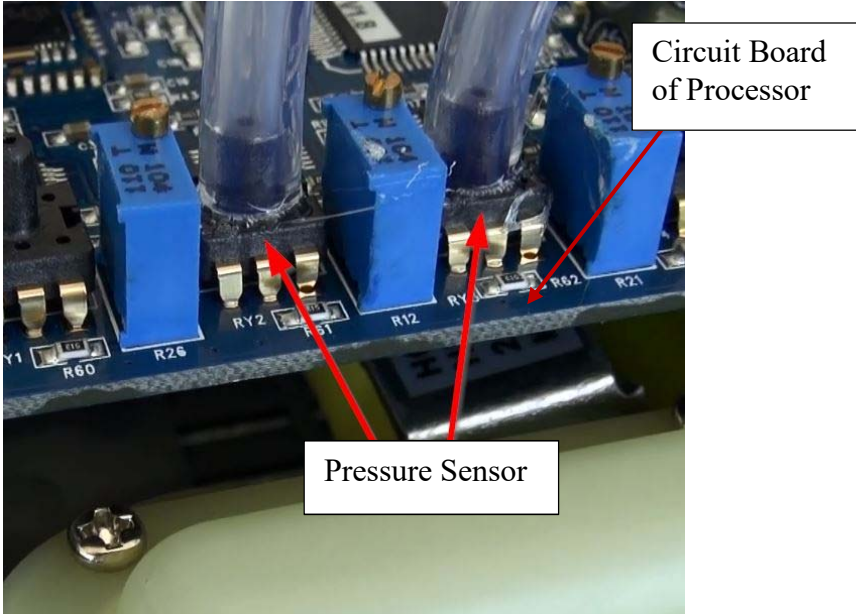
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>The pressure sensor is operatively coupled to a processor. The processor is configured to monitor and capable of continuously monitoring the pressure detected by the pressure sensor, including during inflate and deflate cycles.</p>  <p>(Photograph of Gen 3 Arco)</p> <p>The pressure monitor means is capable of being in fluid communication with the at least one bladder for continuously monitoring the pressure in the at least one bladder. Tubing connects the pressure sensor(s) to the pressure monitoring port(s) of the valve enclosure assembly, the pressure sensor is in fluid communication with the enclosure of the valve enclosure assembly. Tubing fluidly couples the enclosure of the valve enclosure assembly to the air bladder(s). The pressure sensor and the processor are therefore able to continuously monitor the pressure in the air bladder(s).</p> |

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

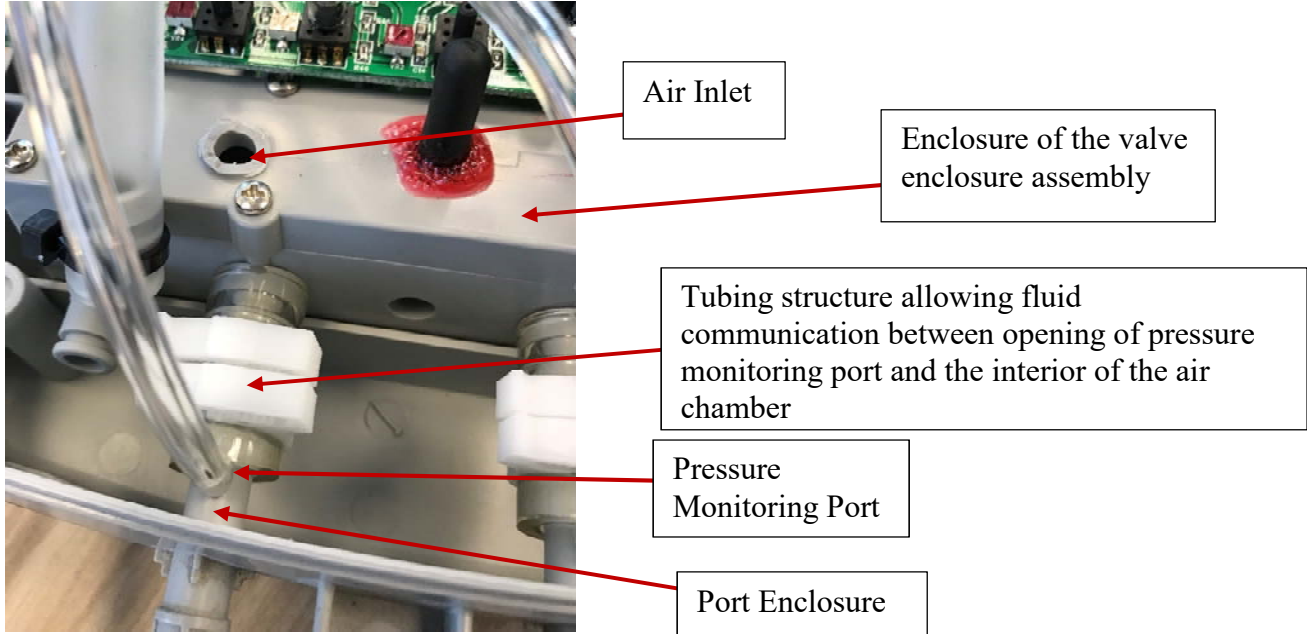
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The Accused Products having a Gen X air controller include pressure monitor means including a sensor operably coupled to the processor. Specifically, the valve enclosure assembly of the Gen X includes a pressure monitoring port, which is capable of being in fluid communication with the interior of the enclosure of the valve enclosure assembly. While the pressure monitoring port does not literally define an opening through the enclosure, it meets this limitation under the doctrine of equivalents. That is, the pressure monitoring port defines an opening through a port enclosure, which is fluidly coupled to the interior of the enclosure. That is, the pressure monitoring port defines an opening that is capable of being in fluid communication with the interior of the air chamber to perform substantially the same function in substantially the same way to obtain the substantially same result.</p> <p>Gen X:</p>  <p>(Photograph of Gen X)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>As seen, the pressure monitoring port defines an opening. This opening continues into the port enclosure. The interior of the port enclosure is capable of being in fluid communication with the interior area of the air chamber of the enclosure via the tubing structure, identified above.</p> <p>As seen in the photograph below, a tube is connected to the pressure monitoring port. The tube is also connected to a pressure sensor. In addition, and as discussed above, the pressure in the one or more air bladders is conveyed to the port enclosure and the enclosure of the valve enclosure assembly via tubing that fluidly couples the valve enclosure assembly to the air bladder(s). The bladder pressure is conveyed to the pressure sensor from the pressure monitoring port.</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>Pressure Sensor</p> <p>Valve (general location)</p> <p>Tube, connected to the pressure sensor and pressure monitoring port</p> <p>Port in fluid communication with the interior of the enclosure of the valve enclosure assembly</p> <p>Fluidly couples the enclosure of the Valve Enclosure Assembly to an Air Bladder</p> <p>(Photograph of the Gen X)</p> |

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

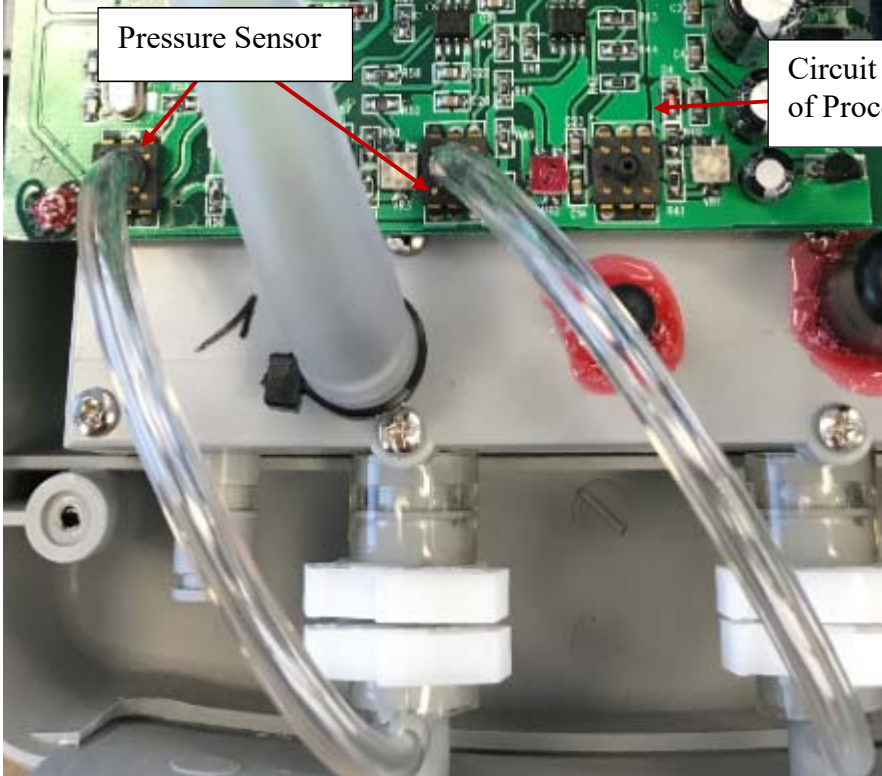
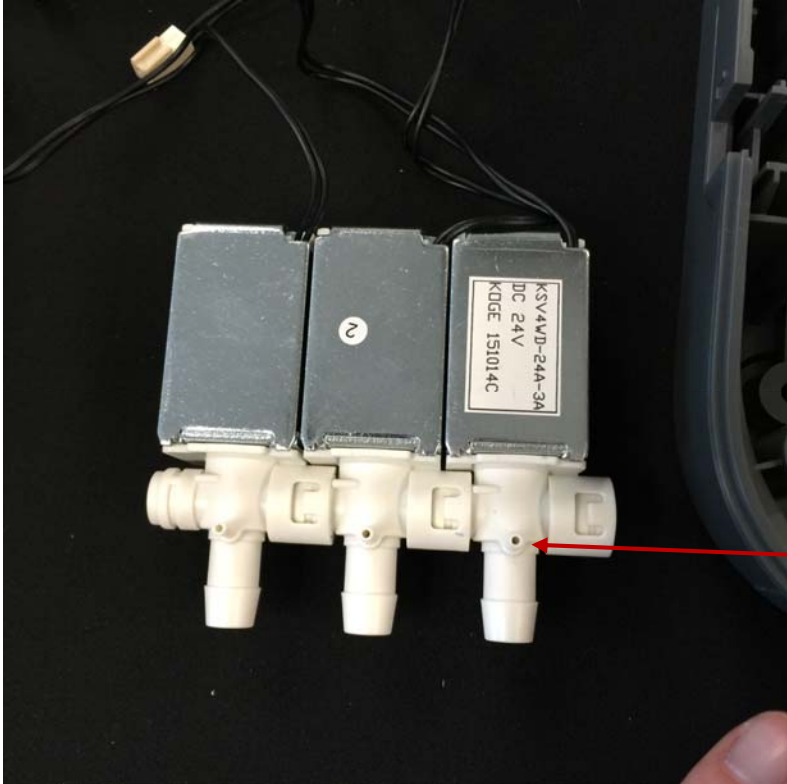
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>The pressure sensor is operatively coupled to a processor. The processor is configured to monitor and capable of continuously monitoring the pressure detected by the pressure sensor, including during inflate and deflate cycles.</p>  <p>(Photograph of Gen X)</p> <p>The pressure monitor means is capable of being in fluid communication with the at least one bladder for continuously monitoring the pressure in the at least one bladder. Tubing connects the pressure</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>sensor(s) to the pressure monitoring port(s) of the valve enclosure assembly, the pressure sensor is in fluid communication with the enclosure of the valve enclosure assembly. Tubing fluidly couples the enclosure of the valve enclosure assembly to the air bladder(s). The pressure sensor and the processor are therefore able to continuously monitor the pressure in the air bladder(s).</p> <p>The Accused Products having a Gen 3 Koge air controller include pressure monitor means operably coupled to the processor. Specifically, the valve enclosure assembly of the Gen 3 Koge includes a pressure monitoring port in fluid communication with the interior of the enclosure of the valve enclosure assembly and the air bladder.</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>Gen 3 Koge:</p>  <p>(Photograph of Gen 3 Koge)</p> <p>As seen, the pressure monitoring port defines an opening into the enclosure. This opening continues through the enclosure and into the interior area of the air chamber.</p> <p>As seen in the photograph below, a tube is connected to the pressure monitoring port. The tube is also connected to a pressure sensor. In addition, and as discussed above, the pressure in the one or more air</p> |

Pressure Monitoring Port in fluid communication with the interior of the enclosure of the valve enclosure assembly

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

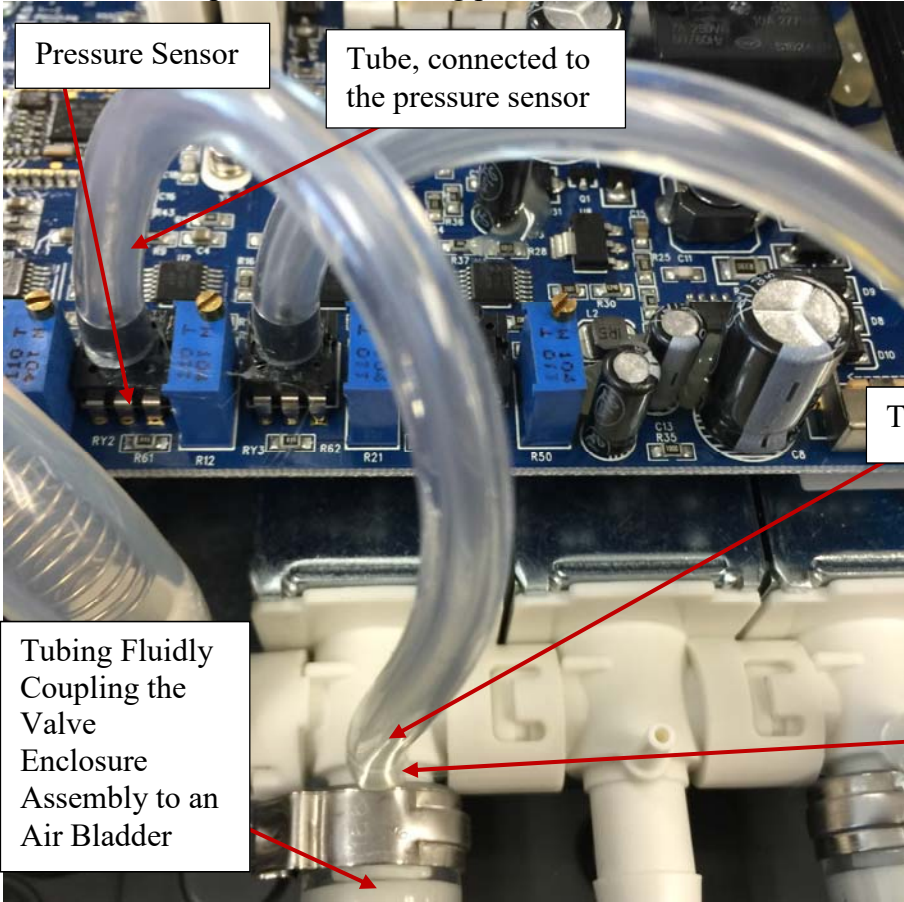
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>bladders is conveyed to the valve enclosure assembly via tubing that fluidly couples the enclosure of the valve enclosure assembly to the air bladder(s). The bladder pressure is conveyed to the pressure sensor from the pressure monitoring port.</p>  <p>The photograph shows a blue printed circuit board (PCB) with various electronic components. A pressure sensor is mounted on the board, with a clear plastic tube connected to it. Another clear plastic tube is connected to a port on the board. Below the PCB, a white plastic valve enclosure assembly is visible, with a clear plastic tube connecting it to the pressure sensor. Red arrows point from text boxes to these components.</p> <p>Pressure Sensor</p> <p>Tube, connected to the pressure sensor</p> <p>Tube, connected to the port</p> <p>Tubing Fluidly Coupling the Valve Enclosure Assembly to an Air Bladder</p> <p>Pressure Monitoring Port in fluid communication with the interior of the enclosure of the valve enclosure assembly</p> <p>(Photograph of the Gen 3 Koge)</p> |

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

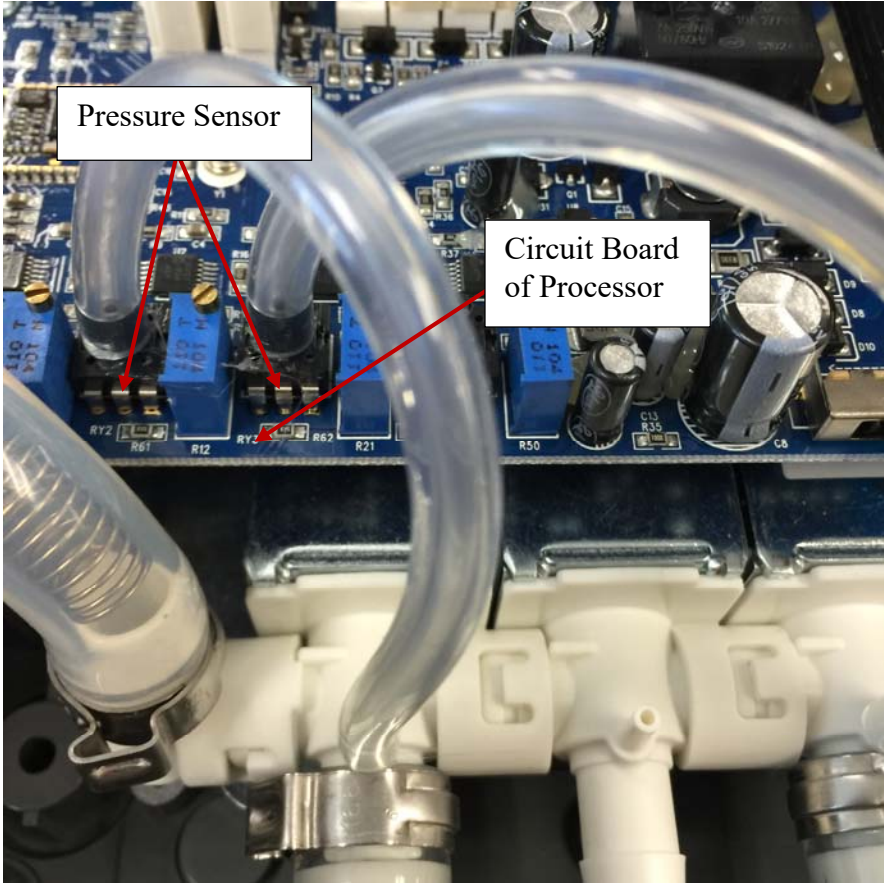
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The pressure sensor is operatively coupled to a processor. The processor is configured to monitor and capable of continuously monitoring the pressure detected by the pressure sensor, including during inflate and deflate cycles.</p>  <p>(Photograph of Gen 3 Koge)</p> |

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

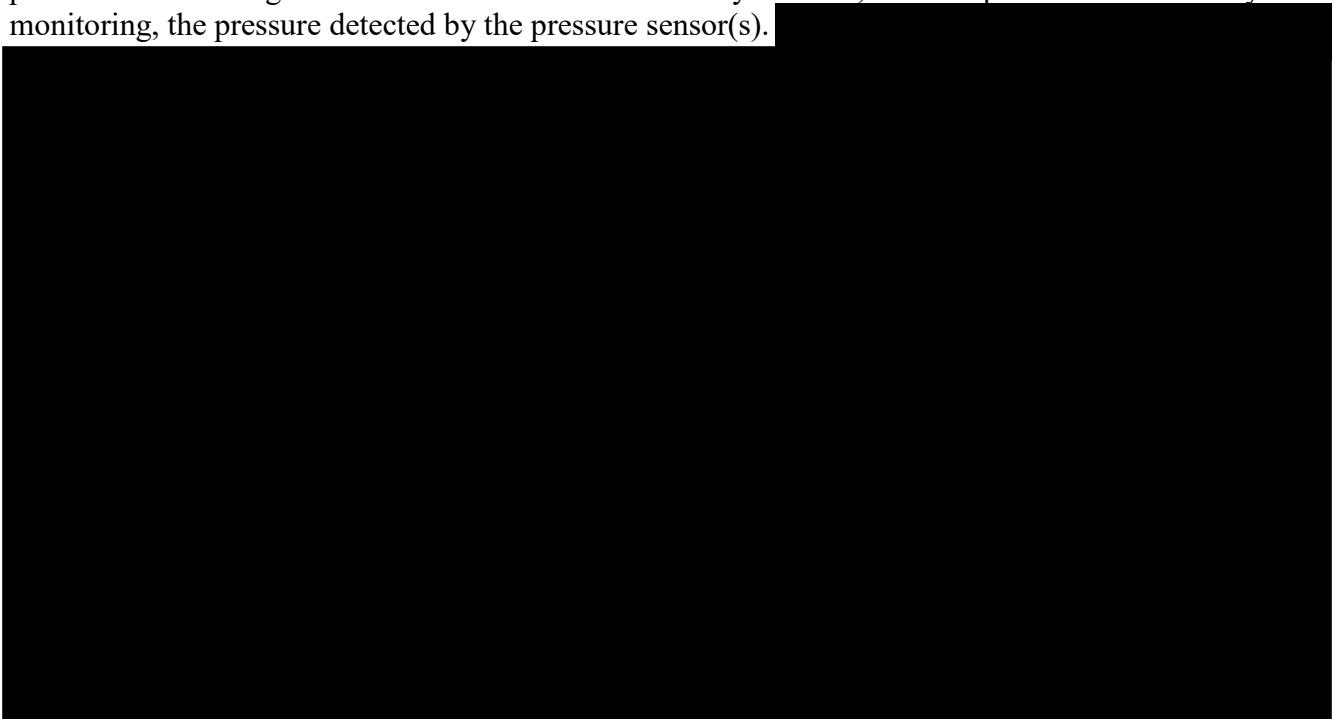
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>The pressure monitor means is capable of being in fluid communication with the at least one bladder for continuously monitoring the pressure in the at least one bladder. Tubing connects the pressure sensor(s) to the pressure monitoring port(s) of the valve enclosure assembly, the pressure sensor is in fluid communication with the enclosure of the valve enclosure assembly. Tubing fluidly couples the enclosure of the valve enclosure assembly to the air bladder(s). The pressure sensor and the processor are therefore able to continuously monitor the pressure in the air bladder(s).</p> <p>Versions 1.8, 1.97, and 2.0 of ANM's source code further demonstrate that Gen 3 Accused Products' processors are configured to monitor and do continuously monitor, or are capable of continuously monitoring, the pressure detected by the pressure sensor(s).</p>  |

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

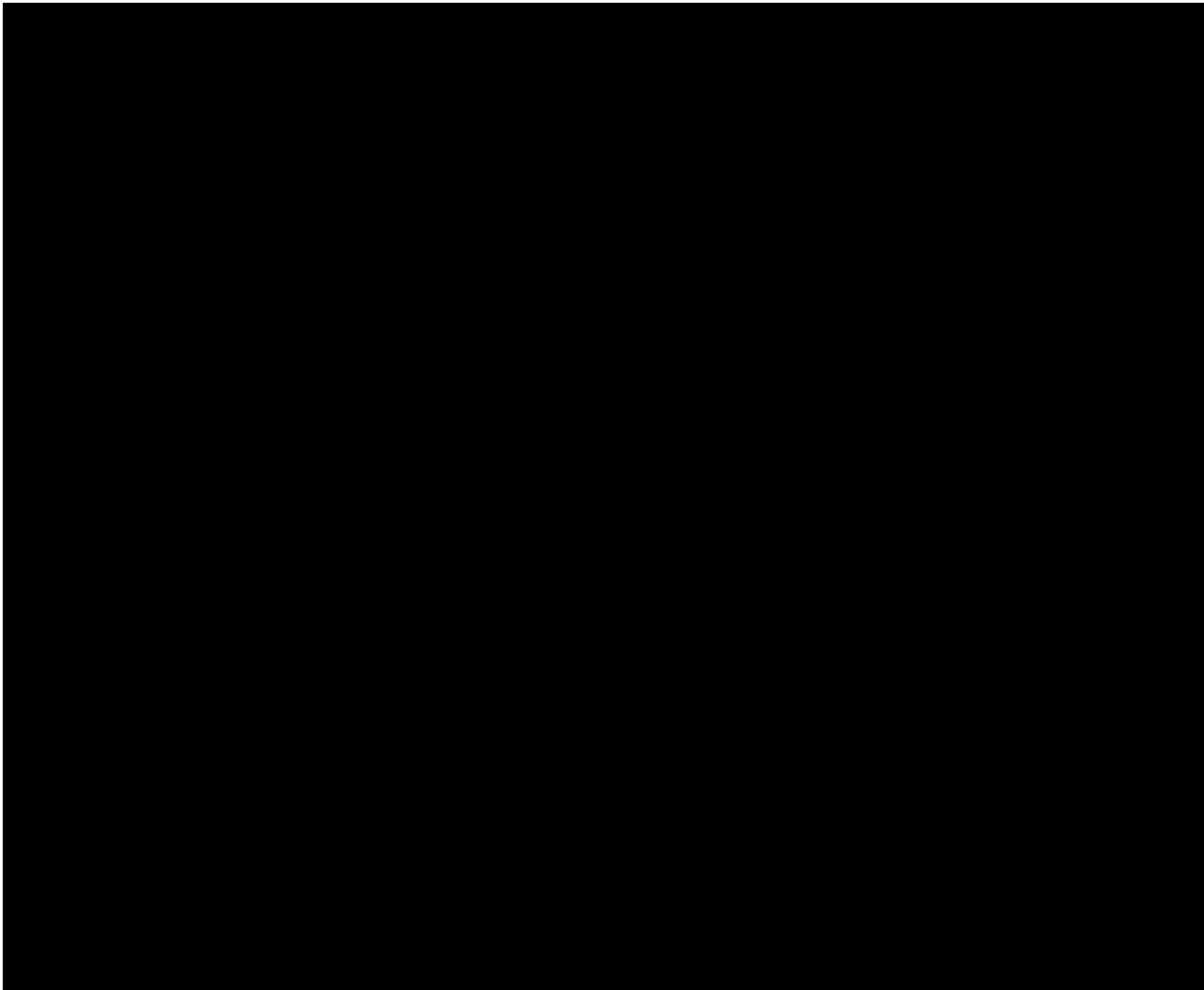
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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EXHIBIT A1 - U.S. PATENT NO. 5,904,172 VERSUS AMERICAN NATIONAL MANUFACTURING ACCUSED PRODUCTS

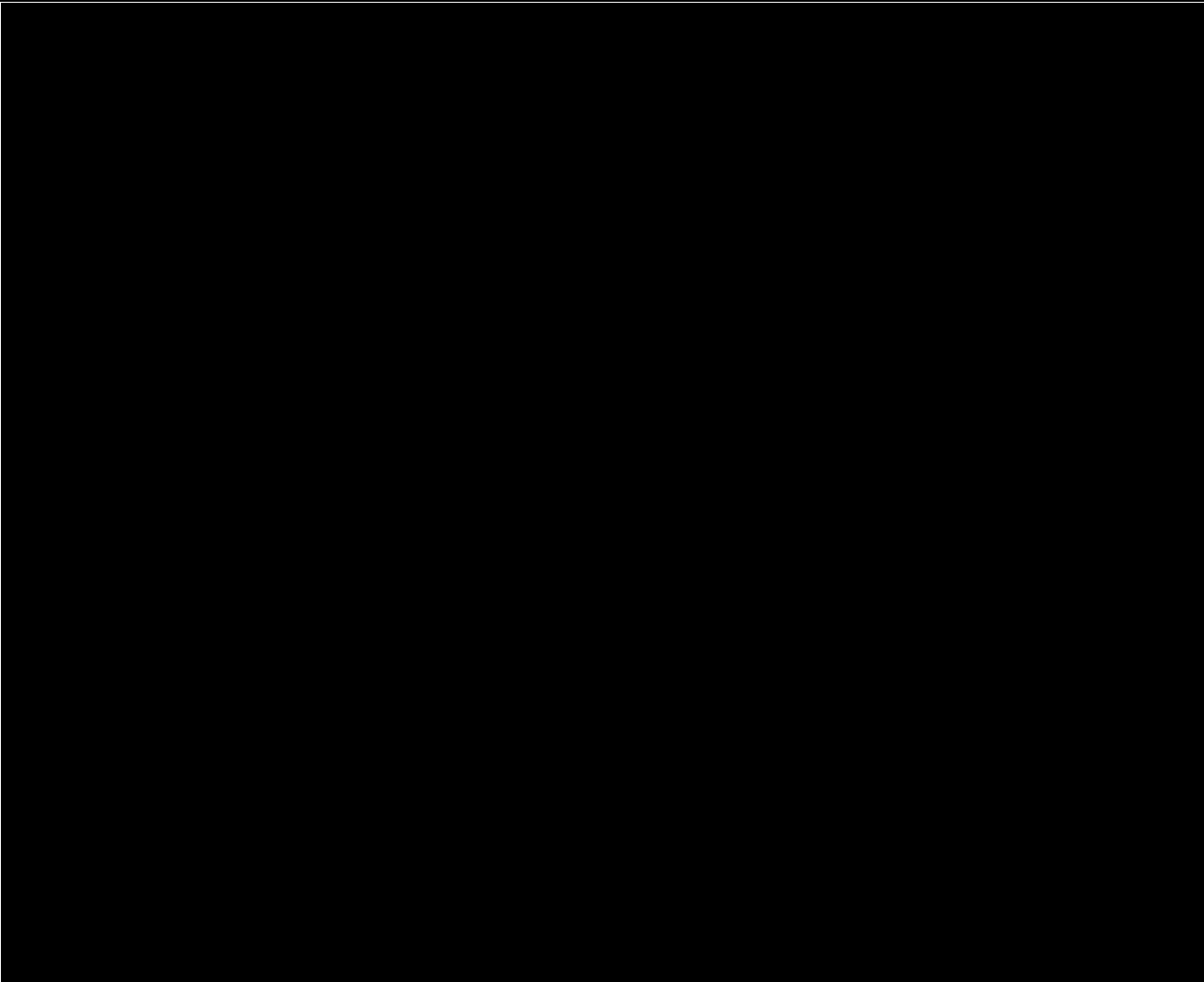
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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EXHIBIT A1 - U.S. PATENT NO. 5,904,172 VERSUS AMERICAN NATIONAL MANUFACTURING ACCUSED PRODUCTS

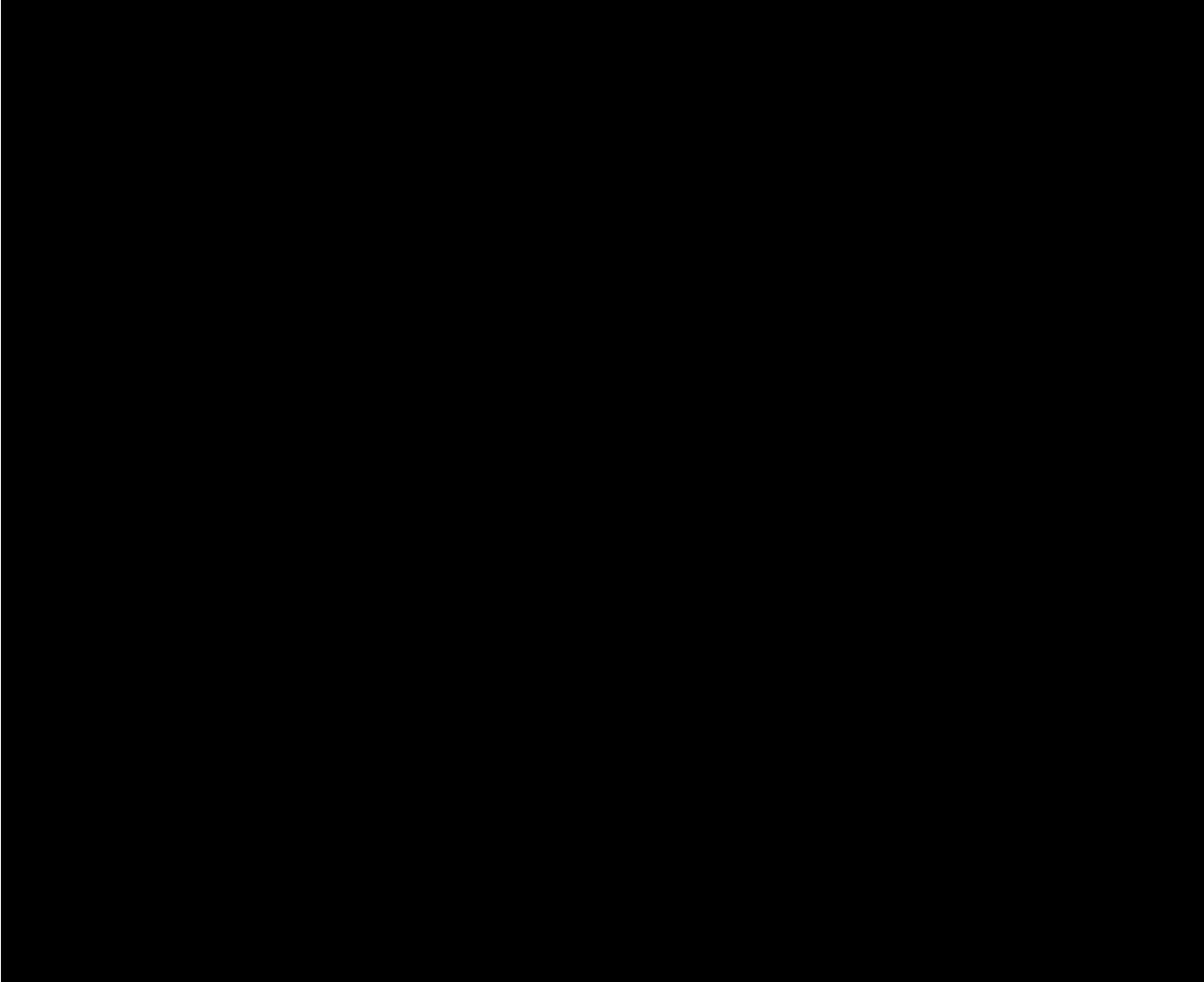
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| |  A large black rectangular redaction covers the entire content area of the 'INFRINGEMENT CONTENTIONS' column. |

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

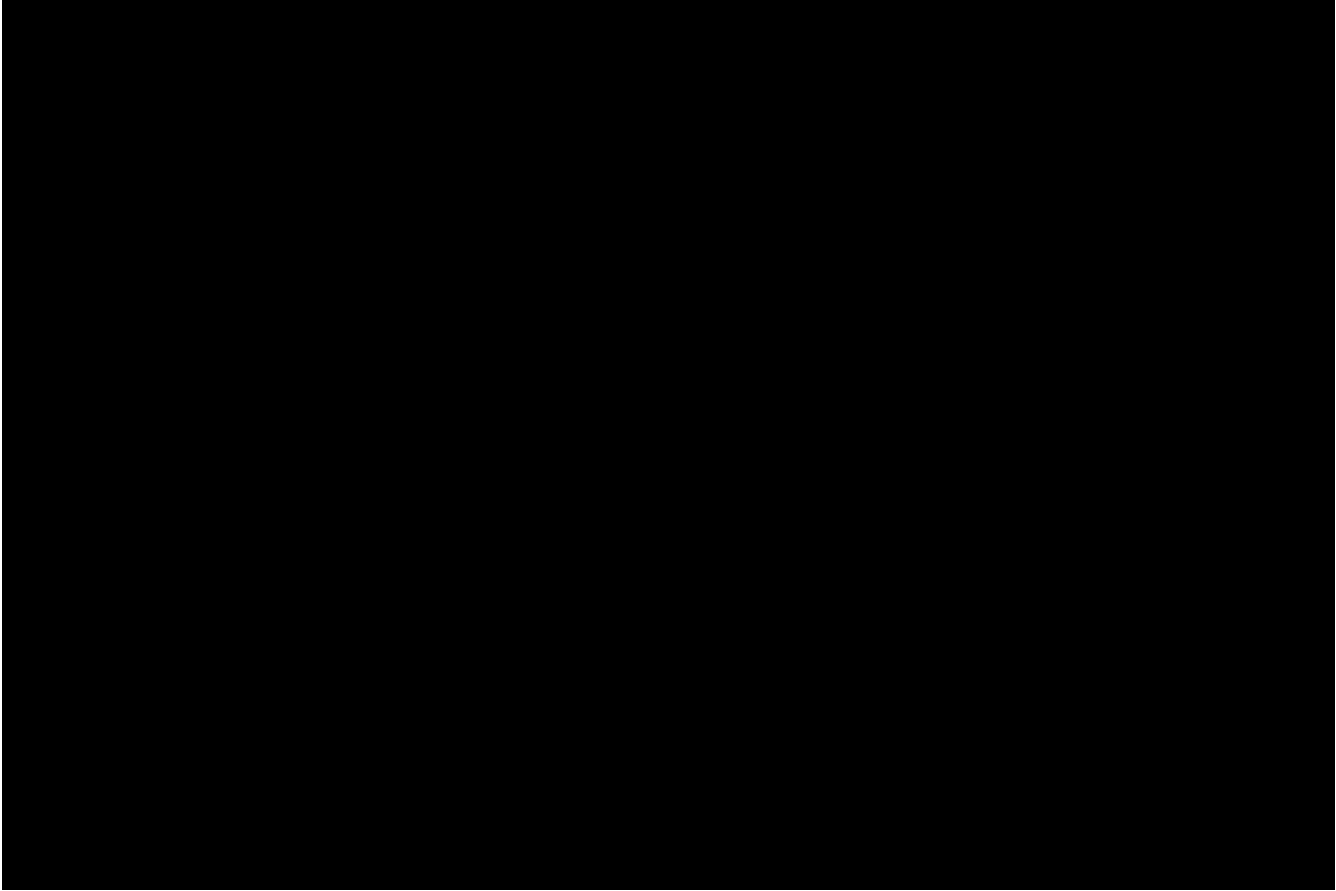
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="674 1260 1976 1401">This limitation may further implicate other electronics, software, firmware, and/or source code of the Accused Products. Additional Source Code for the Accused Products may further show how this claim limitation is met. To resolve a dispute regarding Plaintiff's Notice of Inspection for Source Code, the parties have agreed that Plaintiff shall be allowed to inspect remaining Source Code for the</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| | <p>Accused Products on mutually agreeable date(s), after which Plaintiff shall supplement its infringement contentions, pursuant to an agreed-upon timeline and without opposition, using the information learned during the inspection.</p> |
| <p>Claim 22</p> | |
| <p>[22.1] The improved valve enclosure assembly of claim 2 further including at least one solenoid configured to operate a valve, wherein the at least one solenoid is at least partially received within the air chamber of the enclosure.</p> | <p>Under the plain and ordinary meaning of the claim terms in light of the specification, the Gen 3 Arco, Gen X, and Gen 3 Koge air controllers have an improved valve enclosure assembly further including at least one solenoid configured to operate a valve, wherein the at least one solenoid is at least partially received within the air chamber of the enclosure.</p> <p>The Accused Products having a Gen 3 Arco air controller include at least one solenoid configured to or capable of operating a valve, wherein the at least one solenoid is at least partially received within the air chamber of the enclosure. Specifically, the valve enclosure assembly of the Gen 3 Arco includes a plurality of valves operably coupled to the enclosure. The valve is created by a valve seat and the plunger of a solenoid. The valve seat is part of the mold that creates the enclosure of the valve enclosure assembly. The plunger of the solenoid is inserted into the enclosure of the valve enclosure assembly (shown in the example to the left below) such that the plunger is capable of contacting the valve seat to close the valve. Therefore, the solenoid is at least partially received within the air chamber of the enclosure.</p> |

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

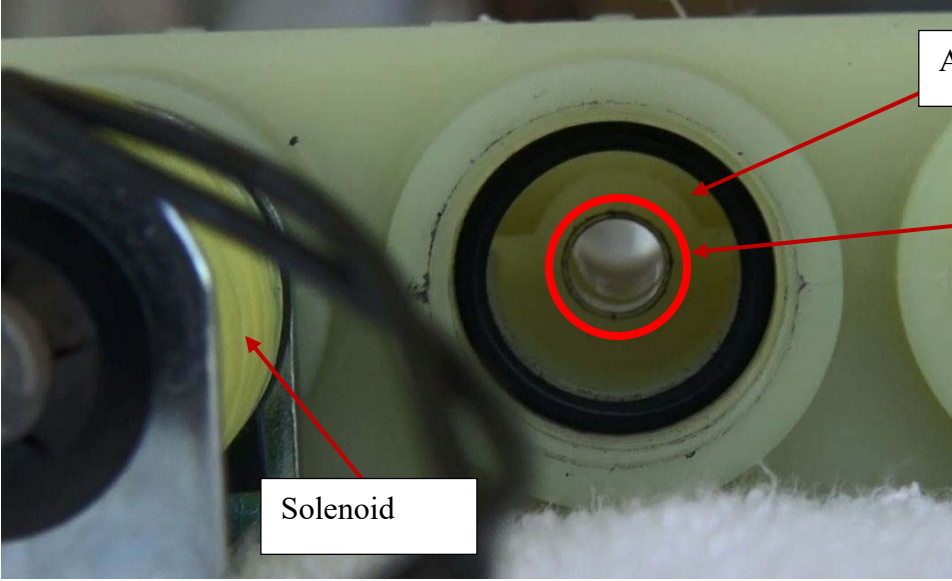
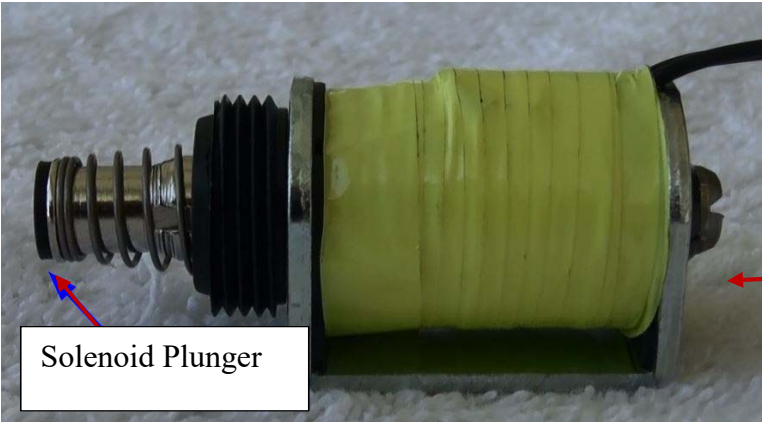
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
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| |  <p>(Photograph of Gen 3 Arco's valve enclosure assembly with a solenoid removed)</p>  |

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

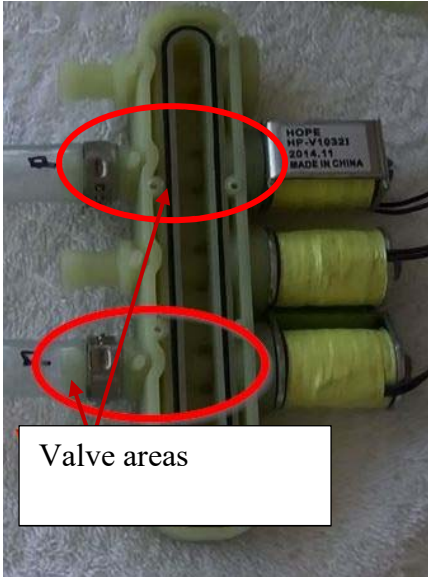
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The solenoid is configured to or capable of operating the valve by extending or retracting the solenoid plunger:</p>  <p>(Photographs of Gen 3 Arco)</p> <p>When the solenoid plunger is retracted the valve opens and air can pass from the air chamber of the enclosure of the valve enclosure assembly through the valve. When the solenoid plunger extends into the enclosure of the valve enclosure assembly and operably connects to the valve seat, the valve is closed; air can no longer pass through the valve.</p> <p>The Accused Products having a Gen X air controller include at least one solenoid configured to or capable of operating a valve, wherein the at least one solenoid is at least partially received within the air chamber of the enclosure. Specifically, the valve enclosure assembly of the Gen X includes a plurality of valves operably coupled to the enclosure. The valve is created by a valve seat and the</p> |

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

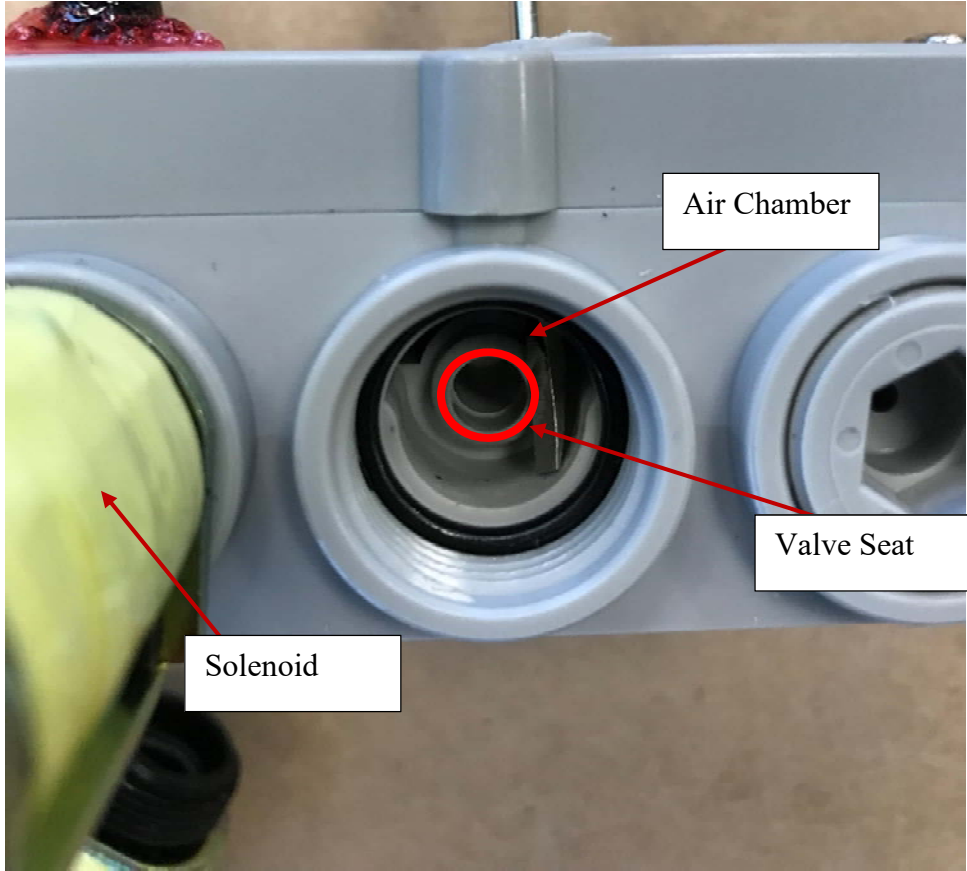
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| | <p>plunger of a solenoid. The valve seat is part of the mold that creates the enclosure of the valve enclosure assembly. The plunger of the solenoid is inserted into the enclosure of the valve enclosure assembly (shown in the example to the left below) such that the plunger is capable of contacting the valve seat to close the valve. Therefore, the solenoid is at least partially received within the air chamber of the enclosure.</p>  <p>(Photograph of Gen 3 Arco's valve enclosure assembly with a solenoid removed)</p> |

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

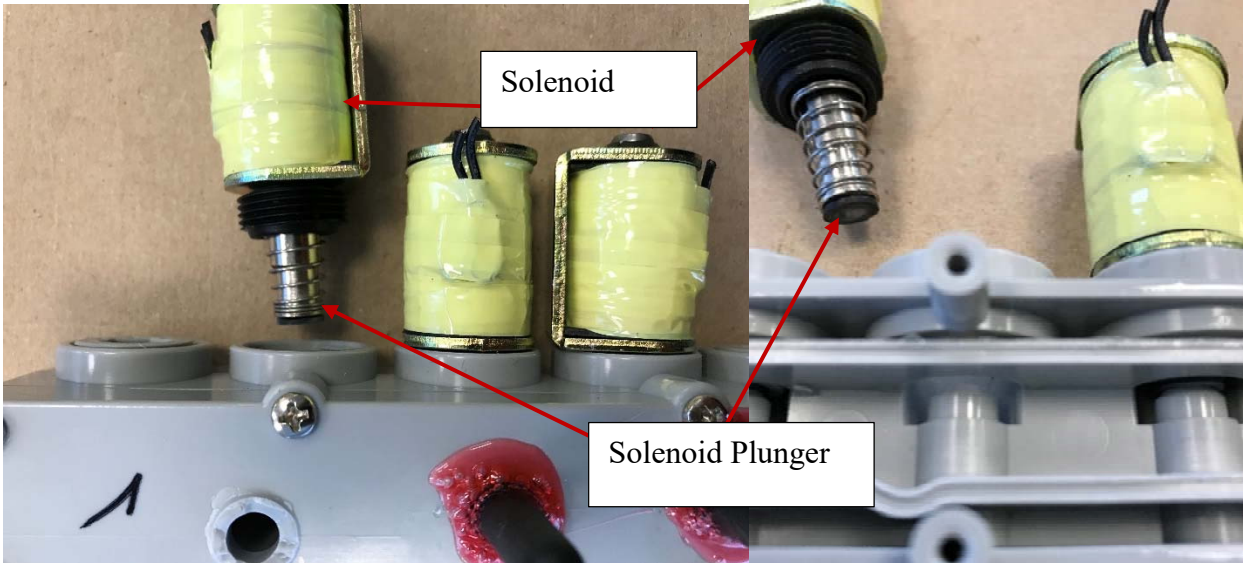
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p>(Photographs of Gen X)</p> |

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

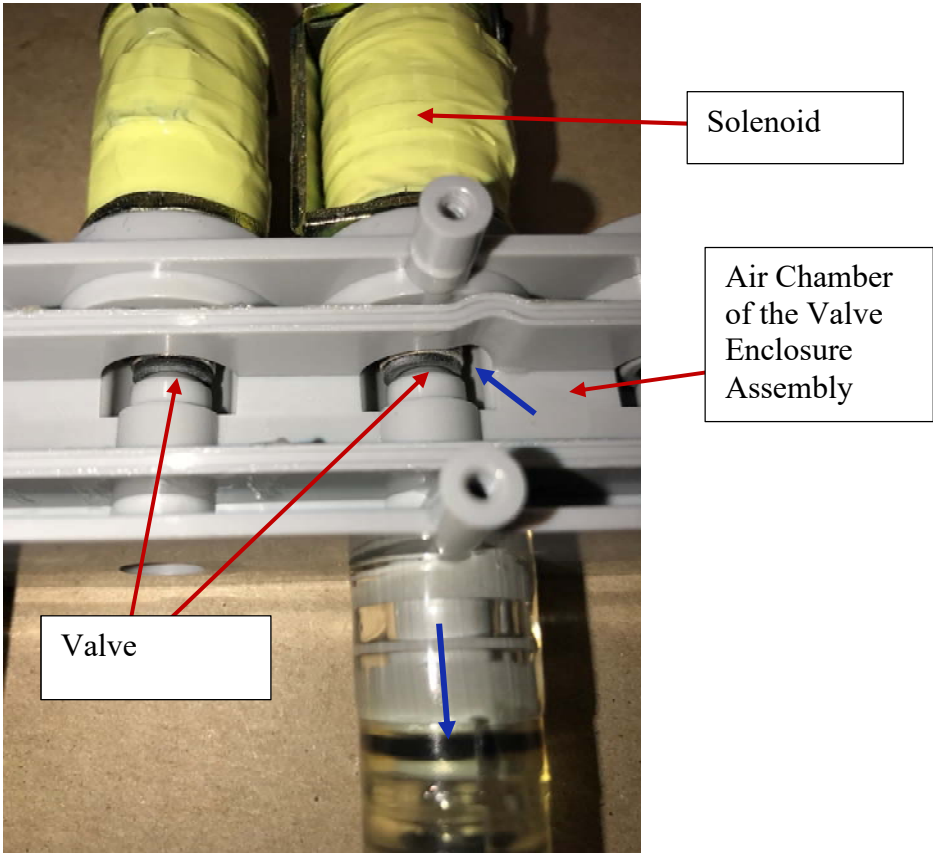
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>The solenoid is configured to or capable of operating the valve by extending or retracting the solenoid plunger:</p>  <p>(Photograph of Gen X)</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| | <p>When the solenoid plunger is retracted the valve opens and air (represented by blue arrows) can pass from the air chamber of the enclosure of the valve enclosure assembly through the valve. When the solenoid plunger extends into the enclosure of the valve enclosure assembly and operably connects to the valve seat, the valve is closed; air can no longer pass through the valve.</p> <p>The Accused Products having a Gen 3 Koge air controller include at least one solenoid configured to or capable of operating a valve, wherein the at least one solenoid is at least partially received within the air chamber of the enclosure. Specifically, the valve enclosure assembly of the Gen 3 Koge includes a plurality of valves operably coupled to the enclosure. The valve is created, at least in part, by the plunger of a solenoid being inserted into the enclosure of the valve enclosure assembly such that the plunger is capable of closing the valve. Therefore, the solenoid is at least partially received within the air chamber of the enclosure.</p> <p>The valve enclosure assembly of the Gen 3 Koge includes a plurality of valves fluidly connected to the bladder. The photograph below shows a valve in that is partially contained within the enclosure of the valve enclosure assembly of the Gen 3 by Koge device. That is, when the modular valve enclosure assembly elements are connected, the valve is, at least partially, contained within the substantially fluidly sealed air chamber of the enclosure of the valve enclosure assembly. When the solenoid plunger is retracted the valve opens and air can pass from the air chamber of the enclosure of the valve enclosure assembly through the valve. When the solenoid plunger extends into the enclosure of the valve enclosure assembly and operably closes the valve air can no longer pass through the valve.</p> |

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

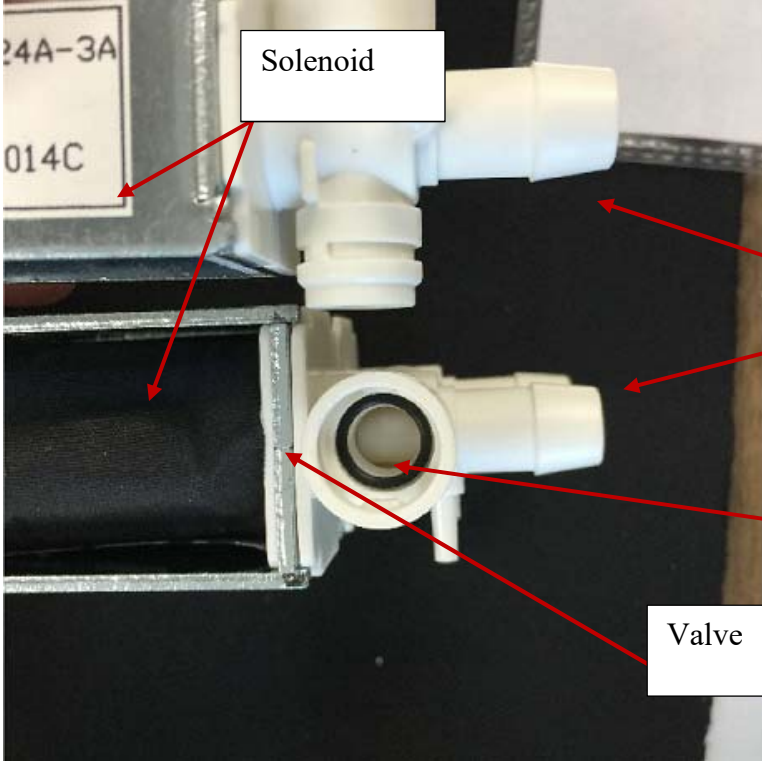
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>(Photograph of Gen 3 Koge)</p> |

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

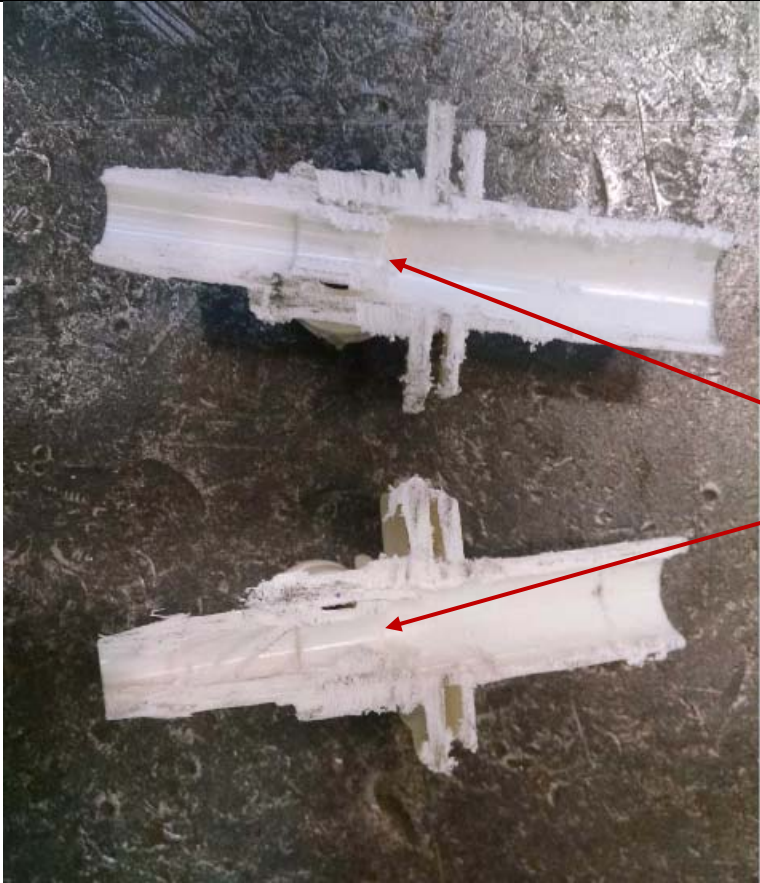
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|--|
| |  <p data-bbox="680 1224 1045 1256">(Photograph of Gen 3 Koge)</p> <p data-bbox="680 1312 1990 1383">The solenoid is seen in a partially deconstructed state below. The solenoid includes a solenoid plunger within the enclosure that is capable of connecting or coupling to the valve seat.</p> |

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


| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>(Photograph of Gen 3 Koge)</p> |

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

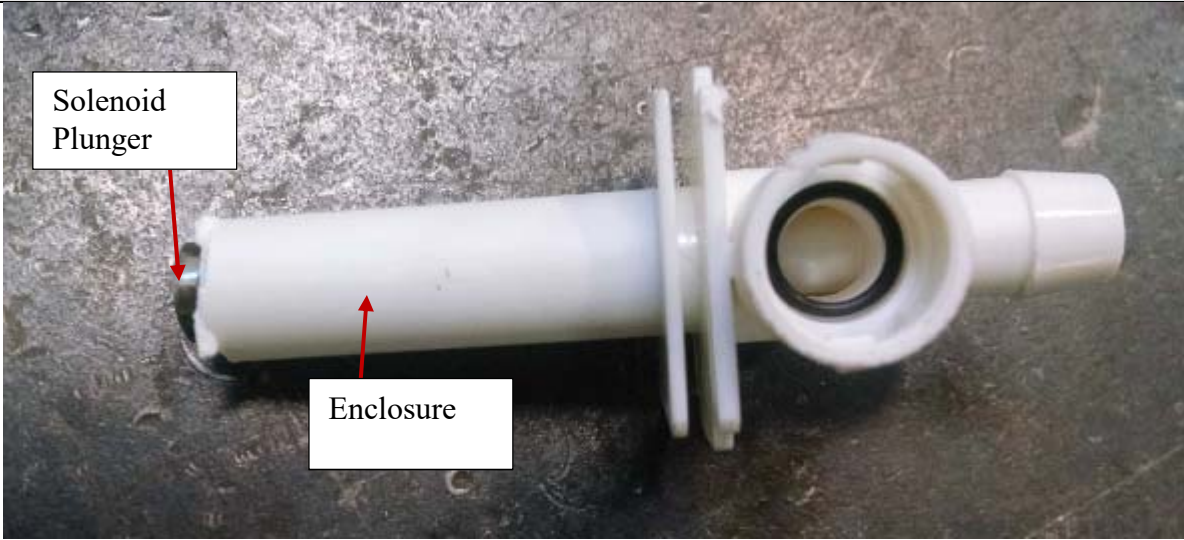
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---|---|
| |  <p align="center">(Photograph of Gen 3 Koge)</p> |
| <p>Claim 24</p> <p>[24.1] The improved valve enclosure assembly of claim 2 wherein the enclosure is formed of an enclosure portion and a rear cover portion.</p> | <p>Under the plain and ordinary meaning of the claim terms in light of the specification, the Gen 3 Arco, Gen X, and Gen 3 Koge Air Controllers have an improved valve enclosure assembly wherein the enclosure is formed of an enclosure portion and a rear cover portion.</p> <p>The Accused Products having a Gen 3 Arco air controller further include an enclosure being formed of an enclosure portion and a rear cover portion. As seen in the photographs below, the Gen 3 Arco's valve enclosure assembly is comprised of an enclosure portion and a rear cover portion.</p> |

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

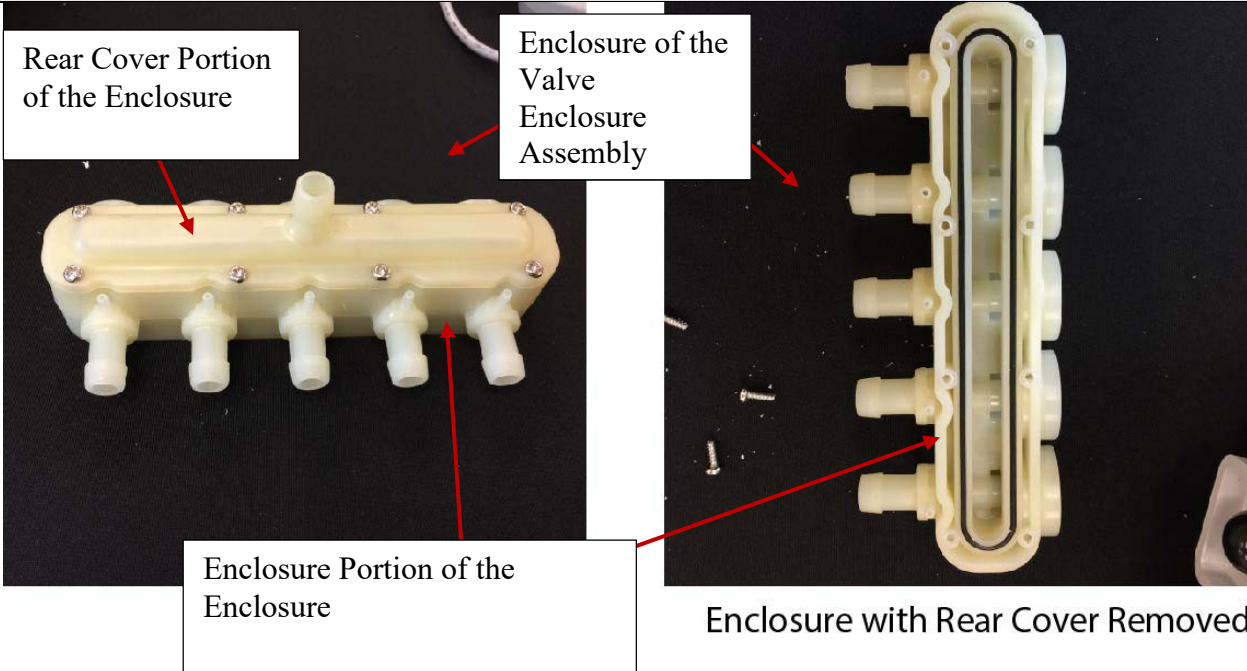
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p>(Photograph of the Gen 3 Arco)</p> <p>The Accused Products having a Gen X air controller further include an enclosure being formed of an enclosure portion and a rear cover portion. As seen in the photographs below, the Gen X's valve enclosure assembly is comprised of an enclosure portion and a rear cover portion.</p> |

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

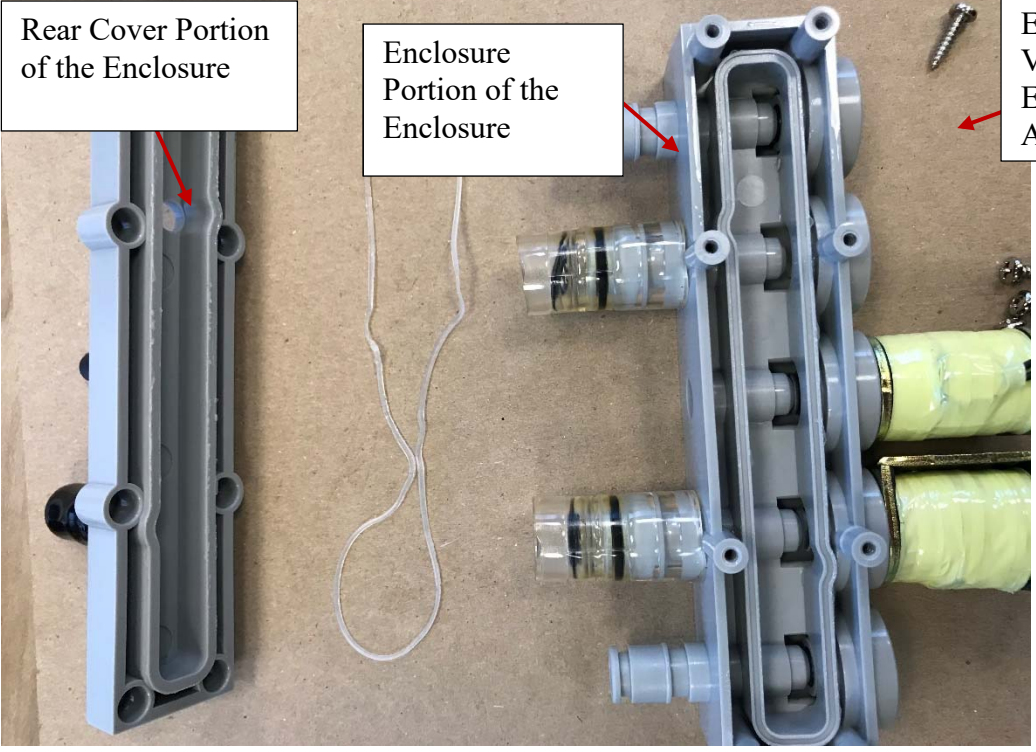
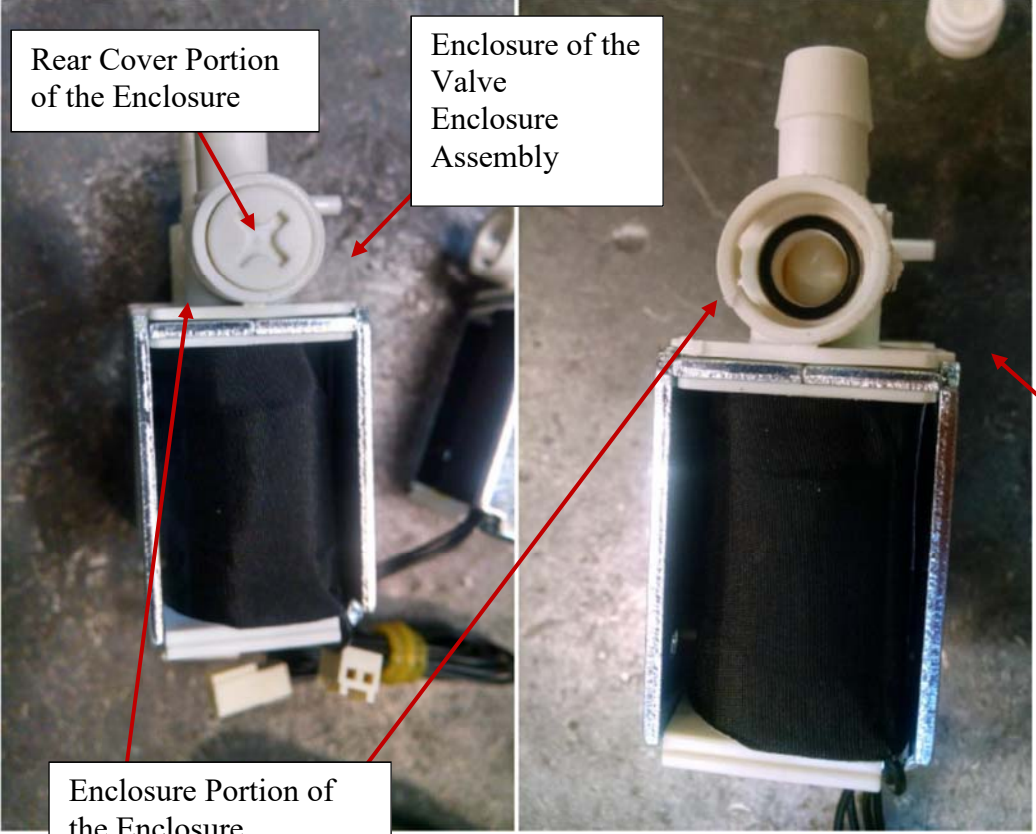
| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="682 1112 1029 1153">(Photograph of the Gen X)</p> <p data-bbox="682 1201 1932 1274">As seen in the photographs below, the Gen 3 Koge's enclosure of the valve enclosure assembly is comprised of an enclosure portion and a rear cover portion.</p> |

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

| CLAIM ELEMENT | INFRINGEMENT CONTENTIONS |
|---------------|---|
| |  <p data-bbox="693 365 997 470">Rear Cover Portion of the Enclosure</p> <p data-bbox="1081 357 1333 544">Enclosure of the Valve Enclosure Assembly</p> <p data-bbox="724 1096 1060 1218">Enclosure Portion of the Enclosure</p> <p data-bbox="1722 690 1984 901">Enclosure of Valve Enclosure Assembly (Rear Cover Portion Removed)</p> <p data-bbox="682 1218 1092 1258">(Photograph of the Gen 3 Koge)</p> |