

EXHIBIT A2 - U.S. PATENT NO. 5,904,172 VERSUS SIZEWISE RENTALS, LLC ACCUSED PRODUCTS

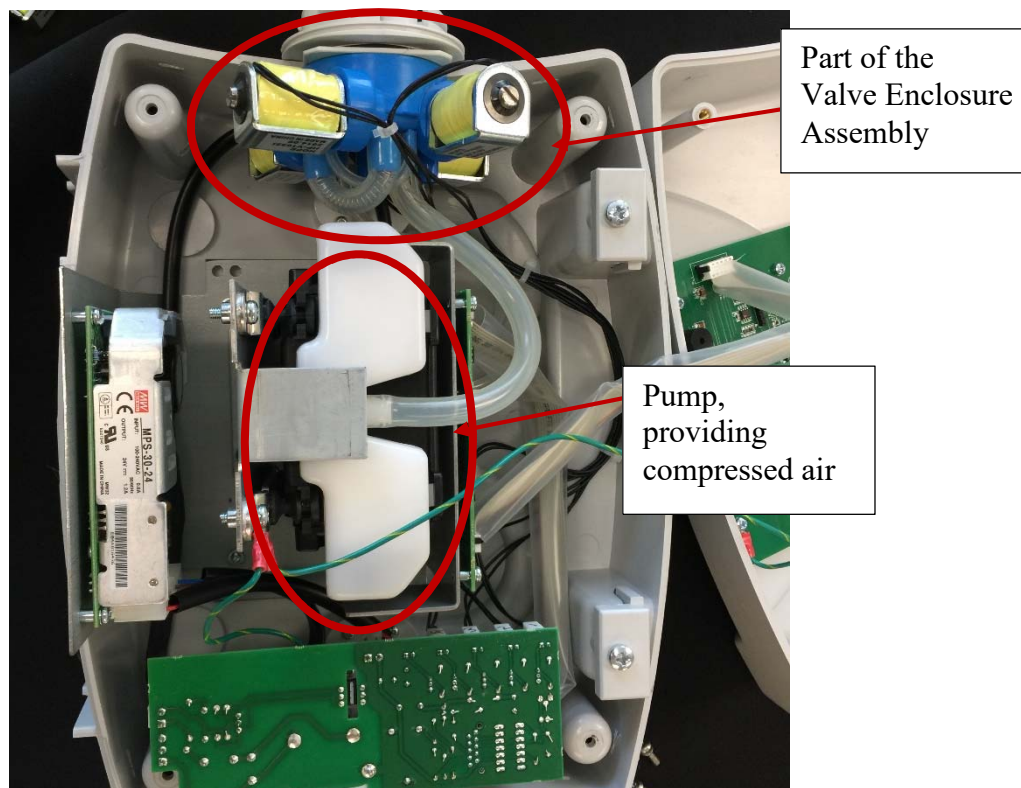
Pursuant to P.R. 3-1(c) and the Joint Stipulation Regarding Amending Infringement and Invalidity Contention (-356 case, Dkt. 138; -357, Dkt. 137), Plaintiff has included a chart below identifying specifically where each element of each asserted claim of the '172 Patent is found in Defendant's air mattress systems that utilize the Platinum 5000 and Platinum 6000 air controllers. Because the Platinum 6000 is representative of the Platinum 5000, both products are generally depicted using a Platinum 6000 product below. Specifically, Plaintiff provides the following information: (1) identifies the claim element, which includes prior disclosures and supplementations provided to Defendants on September 7, November 16, and November 26, 2019; (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 applicable/appropriate. These disclosures incorporate by reference the Representative Product Chart, served herewith. Further, these disclosures are made in light of foreseeable claim construction positions, and 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 entered into between the parties.

CLAIM ELEMENT	INFRINGEMENT CONTENTIONS
<p>Claim 2</p> <p>2] An improved valve enclosure assembly for use with an air inflatable mattress having at least one air bladder inflated by compressed air, a pump fluidly coupled to the at least one air bladder for providing compressed air thereto, and a processor for providing commands to the improved valve enclosure assembly during an inflate/deflate cycle, the improved valve enclosure assembly being fluidly coupled intermediate the pump and the at least one air bladder for controlling inflation of the at least one air bladder, comprising:</p>	<p>The preamble of claim 2 is limiting and under the plain and ordinary meaning of these claim terms in light of the specification, each claim limitation is met by Sizewise's Accused Products. Specifically, the Platinum 5000 or Platinum 6000 Air Controllers (herein collectively "Platinum 5000/6000") 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 Platinum 5000/6000 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 A2 - U.S. PATENT NO. 5,904,172 VERSUS SIZEWISE RENTALS, LLC ACCUSED PRODUCTS

CLAIM ELEMENT

INFRINGEMENT CONTENTIONS



(Photograph representative of Platinum 5000/6000)

The valve enclosure assembly of the Platinum 5000/6000 is used with an air inflatable mattress having at least one air bladder inflated by compressed air. For example, the Platinum 6000 is used with an air inflatable mattress, as seen below. The Platinum 5000 is also used with an air inflatable mattress (not depicted).

EXHIBIT A2 - U.S. PATENT NO. 5,904,172 VERSUS SIZEWISE RENTALS, LLC ACCUSED PRODUCTS


CLAIM ELEMENT	INFRINGEMENT CONTENTIONS
	<p>Platinum 6000™</p> <p>Platinum 6000™ and low air loss t pressures are re settings providing</p> <p>Platinum 6000™ settings based on mattress pressur power failures, a conventional hos 6000™ is ideal fo automatic operat</p> <p>Product Deta</p> <p>Dimensions:</p> <p>Abilities:</p>  <p>(Photograph representative of Platinum 5000/6000)</p>

EXHIBIT A2 - U.S. PATENT NO. 5,904,172 VERSUS SIZEWISE RENTALS, LLC ACCUSED PRODUCTS

CLAIM ELEMENT

INFRINGEMENT CONTENTIONS



Air Inflatable
Mattress

Air Controller
containing the Valve
Enclosure Assembly

(Photograph representative of Platinum 5000/6000)

EXHIBIT A2 - U.S. PATENT NO. 5,904,172 VERSUS SIZEWISE RENTALS, LLC ACCUSED PRODUCTS

CLAIM ELEMENT

INFRINGEMENT CONTENTIONS



(Photograph representative of Platinum 5000/6000)

In the Platinum 5000/6000 air controllers, the pump is fluidly coupled to the at least one air bladder for providing compressed air thereto. In the Platinum 5000/6000 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 valve enclosure assembly via tubing. The valve enclosure assembly is then similarly fluidly coupled to the at least one air bladder with tubing that connects to a manifold of the valve enclosure assembly. The pump provides compressed air to the at least one air bladder via the tubing between the pump and the valve enclosure assembly and the tubing between the valve enclosure assembly and the air bladder.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.