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**IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

CARAVAN CANOPY INT'L, INC a California corporation, Plaintiff, v. SHELTERLOGIC CORP., a Delaware corporation; and DOES 1 through 10, Inclusive Defendants.	CASE NO. 5:19-cv-01224-PSG-ADS Consolidated with 8:19-cv-01072-PSG-ADS **INVALIDITY CONTENTIONS OF SHELTERLOGIC CORP.** Hon. Philip S. Gutierrez

In accordance with the Court's Standing Patent Rules ("S.P.R."), the defendant,

ShelterLogic Corp., respectfully submits its Invalidity Contentions containing the information

described in S.P.R. 2.5.1 through 2.5.4.

{N5643360}

In particular, ShelterLogic contends that the claims of U.S. Patent No. 5,944,040 are anticipated by (1) Tsai, U.S. Patent No. 5,638,853 filed March 7, 1996 and issued June 17, 1997 (and/or its German counterpart DE 296 05 106 U1 published on May 23, 1996), and/or (2) Lynch, U.S. Patent No. 4,947,884 issued August 14, 1990.

In addition, ShelterLogic contends that the claims of U.S. Patent No. 5,944,040 would have been obvious to one of ordinary skill in the art at the time of invention, based on:

(1)   Tsai, U.S. Patent No. 5,638,853 filed March 7, 1996 and issued June 17, 1997 (and/or its German counterpart DE 296 05 106 U1 published on May 23, 1996) in view of Lynch, U.S. Patent No. 4,779,635;

(2)   Tsai, U.S. Patent No. 5,638,853 filed March 7, 1996 and issued June 17, 1997 (and/or its German counterpart DE 296 05 106 U1 published on May 23, 1996) in view of Lynch, U.S. Patent No. 4,947,884;

(3)   Lynch, U.S. Patent No. 4,947,884 issued August 14, 1990 in view of Tsai, U.S. Patent No. 5,638,853 filed March 7, 1996 and issued June 17, 1997 (and/or its German counterpart DE 296 05 106 U1 published on May 23, 1996);

(4)   Lynch, U.S. Patent No. 4,947,884 issued August 14, 1990, in view of Stoll, U.S. Patent No. 1,639,755, issued on August 23, 1927;

(5)   Lynch, U.S. Patent No. 4,779,635 in view of Tsai, U.S. Patent No. 5,638,853 filed March 7, 1996 and issued June 17, 1997 (and/or its German counterpart DE 296 05 106 U1 published on May 23, 1996);

(6)   Lynch, U.S. Patent No. 4,779,635 in view of Lynch, U.S. Patent No. 4,947,884 issued August 14, 1990; and/or

(7)   Lynch, U.S. Patent No. 4,779,635 in view of Wilkins, U.S. Patent No. 1,204,329 issued November 7, 1916.

Charts identifying where specifically in each alleged item of prior art each limitation of each claim of U.S. Patent No. 5,944,040 is found, are attached hereto as Exhibit A. In addition, where obviousness is alleged, the charts contain an explanation as to why the prior art renders

the asserted claims obvious, and include an identification of the prior art combinations showing obviousness. Finally, a copy of each cited prior art reference is attached as Exhibit B.

ShelterLogic respectfully reserves the right to supplement and/or amend these Invalidity Contentions based upon the discovery of additional prior art and/or construction of the claimed invention.

<div align="right">

Respectfully submitted,

CARMODY TORRANCE SANDAK &
HENNESSEY LLP

</div>

Dated: March 16, 2020   By: /s/ John R. Horvack, Jr._____
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         By: /s/ Derrick F. Coleman_____
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CERTIFICATE OF SERVICE

This is to certify that on March 16, 2020, the foregoing document was served via email

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