

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

Stratasys, Inc.,	§	
	§	
Plaintiff,	§	CIVIL ACTION NO. 2:24-cv-00644-JRG
	§	(Lead Case)
v.	§	
Shenzhen Tuozhu Technology Co., Ltd., <i>et al.</i> ,	§	
	§	
	§	
Defendants.	§	

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Stratasys, Inc.,	§	
	§	
Plaintiff,	§	CIVIL ACTION NO. 2:24-cv-00645-JRG
	§	(Member Case)
v.	§	
Shenzhen Tuozhu Technology Co., Ltd., <i>et al.</i> ,	§	
	§	
	§	
Defendants.	§	

**PLAINTIFF STRATASYS, INC.’S SECOND AMENDED DISCLOSURE OF ASSERTED  
CLAIMS AND INFRINGEMENT CONTENTIONS**

Pursuant to Local Patent Rules 3-1 and 3-2, the Court’s May 9, 2025 Order (Dkt. No. 52), and Paragraph 3.1(a)(i) of the Discovery Order (Dkt. No. 35), Plaintiff Stratasys, Inc. (“Stratasys” or “Plaintiff”) hereby submits the following Second Amended Disclosure of Asserted Claims and Infringement Contentions (“Second Amended Infringement Contentions”) to Defendants Shenzhen Tuozhu Technology Co., Ltd., Shanghai Lunkuo Technology Co., Ltd., Bambulab Limited, and Tuozhu Technology Limited (collectively, “Bambu Lab” or “Defendants”)<sup>1</sup> with

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<sup>1</sup> For avoidance of doubt, while Stratasys’s Unopposed Motion to Consolidate Case No. 2:25-cv-00465-JRG with the Above-Captioned Cases (Dkt. No. 54) is still pending before the Court, upon consolidation it should be understood that these Second Amended Infringement Contentions also apply to counter-defendant BambuLab USA, Inc.

respect to United States Patent Nos. 9,421,713 (“the ’713 Patent”); 9,592,660 (“the ’660 Patent”); 7,555,357 (“the ’357 Patent”); 9,168,698 (“the ’698 Patent”); 10,556,381 (“the ’381 Patent”); 10,569,466 (“the ’466 Patent”); 11,167,464 (“the ’464 Patent”); 8,747,097 (“the ’097 Patent”); 11,886,774 (“the ’774 Patent”); and 8,562,324 (“the ’324 Patent”; collectively, the “Asserted Patents”).

Stratasys’s investigation is ongoing, and discovery is in progress. Accordingly, these disclosures are based on information available to Stratasys at this time. Stratasys reserves the right to supplement or amend this disclosure as may be appropriate in view of discovery, further investigation, and/or the claim construction process. Stratasys also reserves the right to assert additional claims of the Asserted Patents, accuse different products, or find alternative literal and/or equivalent infringing elements in Bambu Lab’s products. Nothing in these contentions should be interpreted as an admission or concession regarding the scope of the asserted claims.

**I. DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS PURSUANT TO LOCAL PATENT RULE 3-1**

**A. Asserted Claims (P.R. 3-1(a)) and Priority Dates (P.R. 3-1(e))**

Based upon current publicly available information, Stratasys asserts that Bambu Lab has infringed and/or continues to infringe the Asserted Patents and claims identified in the attached claim charts and outlined below (the “Asserted Claims”). Stratasys reserves the right to identify additional Asserted Claims to the extent additional information becomes available through discovery.

<b>Asserted Patent</b>	<b>Priority Date</b>	<b>Asserted Claims</b>	<b>Claim Chart Ex.</b>
U.S. Patent No. 9,421,713	At least as early as May 23, 2011	1, 2, 5, 6, 7, 9, 16, 17	A
U.S. Patent No. 9,592,660	At least as early as December 17, 2014	1, 2, 4, 6, 7, 8, 10, 11, 12, 14	B
U.S. Patent No. 7,555,357	At least as early as October 18, 2004	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14,	C

		15, 16, 17, 18, 19	
U.S. Patent No. 9,168,698	At least as early as October 29, 2012	1, 2, 3, 4, 5, 7, 8, 9, 10, 12, 15	D
U.S. Patent No. 10,556,381	At least as early as October 29, 2012	1, 2, 5, 6, 9, 11, 12, 14	E
U.S. Patent No. 10,569,466	At least as early as October 29, 2012	1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 16, 17, 19, 20	F
U.S. Patent No. 11,167,464	At least as early as October 29, 2012	1, 2, 3, 4, 5, 6, 12, 13, 14, 15, 17, 18	G
U.S. Patent No. 8,747,097	At least as early as August 18, 2010	1, 2, 4, 5, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18	H
U.S. Patent No. 11,886,774	At least as early as December 31, 2014	1, 2, 3, 4, 5, 6, 8, 9, 10, 12, 13, 19	I
U.S. Patent No. 8,562,324	At least as early as August 18, 2010	1, 3, 5, 6, 7, 8, 9, 10, 11, 17, 18, 19, 20, 21, 22	J

**B. Accused Instrumentalities (P.R. 3-1(b))**

Based on current publicly available information, Stratasys contends that the Asserted Claims are infringed by Bambu Lab’s products (“Accused Instrumentalities”), including but not limited to certain Bambu Lab products identified in the attached claim charts and outlined below. The Accused Instrumentalities include all series, models, and versions of the following Bambu Lab products and any equivalent products, including those marketed under different names. The products identified in the claim charts and below are exemplary, and Stratasys expressly accuses any other reasonably similar products that infringe in the same or similar manner. Stratasys reserves the right to identify additional Bambu Lab products to the extent additional information becomes available through discovery.

Unless stated otherwise, the Bambu Lab X1 or X1C printer refers to the Bambu Lab X1C 3-D printer and Bambu Lab X1C Combo 3-D printer. On information and belief, the Bambu Lab X1E 3-D printer is substantially similar in accused functionality as the Bambu Lab X1C 3-D printer. See <https://bambulab.com/en/x1e>.

Unless stated otherwise, the Bambu Lab A1 printer refers to the Bambu Lab A1 mini 3-D printer and Bambu Lab A1 mini 3-D Combo 3-D printer. On information and belief, the Bambu Lab A1 mini 3-D printer is substantially similar in accused functionality as the Bambu Lab A1 3-D printer. See <https://bambulab.com/en-us/compare> (comparing A1 and A1 mini upon selection).

Unless stated otherwise, the Bambu Lab P1 or P1S printer refers to the Bambu Lab P1S 3-D printer and Bambu Lab P1S Combo 3-D printer. On information and belief, the Bambu Lab P1P 3-D printer is substantially similar in accused functionality as the Bambu Lab P1S 3-D printer. See <https://us.store.bambulab.com/collections/3d-printer/products/p1s>.

In addition, Bambu Lab makes, uses, offers for sale, or sells the following products within the United States, or imports the following products into the United States (hereinafter referred to as “Bambu Lab Parts”):

- Filaments that are AMS and/or AMS Lite Compatible (including but not limited to the PLA Basic, PLA Matte, PETG HF, ABS, PETG Translucent, PLA Galaxy, PLA Metal, PLA Glow, PLA Silk Dual Color, PLA Marbel, PLA Silk, PLA Sparkle, PLA-CF, PETG-CF, PLA CMYK Lithophane Bundle, PLA Basic Gradient, ASA, PC, PA6-GF, ABS-GF, PAHT-CF, Support for PLA-PETG, Support for ABS, Support for PA/PET, PVA, PLA Aero, ASA Aero, ASA-CF, and/or TPU for AMS filaments)
- Build plates for Bambu Lab printers (including but not limited to the Bambu Cool Plate SuperTack, Bambu Textured PEI Plate, Bambu Smooth PEI Plate, Bambu Dual-Texture PEI Plate, Spare Sheet for Bambu High Temperature)
- Bambu Lab AMS Hub
- Bambu Lab Automatic Material System (AMS)

- Bambu Lab Automatic Material System (AMS) lite
- Spare Parts for Bambu Lab X1 series printers (including but not limited to the AP Board, Chamber Camera, MC Board, TH Board, Extruder Interface Board V9, WiFi Antenna, Micro Lidar Cover, Micro Lidar (Dual Red Laser), and AMS Mainboard)
- Spare parts for Bambu Lab P1 series printers (including but not limited to the Chamber Camera & LED, TH Board, WiFi Antenna, MC Board, and AP Board)
- Spare parts for Bambu Lab A1 series printers (including but not limited to the WiFi Antenna, Toolhead Board, Live View Camera, AMS lite Filament Hub, and AMS lite Mainboard)
- Spare parts for AMS (including but not limited to the Filament buffer, Bambu Bus Cable, PTFE Tubes, AMS First Stage Feeder, AMS Connector Board, AMS RFID Board, and AMS Mainboard)
- Spare parts for AMS lite (including but not limited to the AMS lite filament hub, AMS lite feeder unit, AMS lite 4-pin cable, and AMS lite mainboard)

Asserted Patent	Accused Instrumentalities
U.S. Patent No. 9,421,713	For each Asserted Claim of the '713 Patent: All Bambu Lab branded or manufactured three-dimensional (3-D) printers and all Bambu Lab Parts, including but not limited to the Bambu Lab X1C, X1E, P1S, P1P, A1, and A1 mini printers <sup>2</sup> , alone or in combination with Bambu Lab software, such as Bambu Studio, and/or the Bambu Lab Automated Material System (“AMS”) or AMS Lite, and all Bambu Lab Parts.

<sup>2</sup> Stratasys identifies certain Bambu Lab printers that Bambu Lab makes, offers for sale, or sells within the United States or imports into the United States alone or in combination with one or more additional product(s). Unless stated otherwise, references to certain Bambu Lab printers in these contentions refer to the printer and any combinations of the printer with additional product(s). To the extent discovery reveals additional combinations or models that are reasonably related to the identified Bambu Lab printers and that are not known to Plaintiff at this time, Plaintiff reserves the right to supplement these contentions to add those combinations or models.

U.S. Patent No. 9,592,660	For each Asserted Claim of the '660 Patent: All Bambu Lab branded or manufactured three-dimensional (3-D) printers and all Bambu Lab Parts, including but not limited to the Bambu Lab X1C, X1E, P1P, P1S, A1, and A1 mini printers, and/or build plate, including but not limited to Bambu Cool Plate SuperTack, Bambu Textured PEI Plate, Bambu Smooth PEI Plate, Bambu Dual-Texture PEI Plate, and Spare Sheet for Bambu High Temperature.
U.S. Patent No. 7,555,357	For each Asserted Claim of the '357 Patent: All Bambu Lab branded or manufactured three-dimensional (3-D) printers and all Bambu Lab Parts, including but not limited to the Bambu Lab X1C, X1E, P1S, P1P, A1, and A1 mini printers, alone or in combination with Bambu Lab software, such as Bambu Studio.
U.S. Patent No. 9,168,698	For each Asserted Claim of the '698 Patent: All Bambu Lab branded or manufactured three-dimensional (3-D) printers with sensors for detecting force, including but not limited to the Bambu Lab A1 and Bambu Lab A1 mini printers, alone or in combination with Bambu Lab software, such as Bambu Studio or Bambu Handy, and all Bambu Lab Parts.
U.S. Patent No. 10,556,381	For each Asserted Claim of the '381 Patent: All Bambu Lab branded or manufactured three-dimensional (3-D) printers with sensors for detecting force, including but not limited to the Bambu Lab A1 and A1 mini printers, alone or in combination with Bambu Lab software, such as Bambu Studio or Bambu Handy, and all Bambu Lab Parts.
U.S. Patent No. 10,569,466	For each Asserted Claim of the '466 Patent: All Bambu Lab branded or manufactured three-dimensional (3-D) printers with a tag reader, including but not limited to the Bambu Lab X1C, X1E, P1S, P1P, A1, and A1 mini printers, alone or in combination with Bambu Lab software, such as Bambu Studio, and/or the Bambu Lab Automated Material System ("AMS") or AMS Lite and all Bambu Lab Parts.
U.S. Patent No. 11,167,464	For each Asserted Claim of the '464 Patent: All Bambu Lab branded or manufactured three-dimensional (3-D) printers with a tag reader, including but not limited to the Bambu Lab X1C, X1E, P1S, P1P, A1, and A1 mini printers, alone or in combination with Bambu Lab software, such as Bambu Studio and Bambu Handy, run on a device, and/or in combination with the Bambu Lab Automatic Material System ("AMS") or AMS Lite and all Bambu Lab Parts.
U.S. Patent No. 8,747,097	For each Asserted Claim of the '097 Patent: All Bambu Lab branded or manufactured three-dimensional (3-D) printers with lidar, including but not limited to the Bambu Lab X1C and X1E printers, and all Bambu Lab Parts.
U.S. Patent No. 11,886,774	For each Asserted Claim of the '774 Patent: Bambu Lab software, such as Bambu Studio, as used in conjunction with all

	Bambu Lab branded or manufactured three-dimensional (3-D) printers, including but not limited to the Bambu Lab A1, A1 mini, P1P, P1S, X1C, and X1E printers, alone or in combination with the Bambu Lab Automated Material System (“AMS”) or AMS Lite and all Bambu Lab Parts.
U.S. Patent No. 8,562,324	For each Asserted Claim of the ’324 Patent: All Bambu Lab devices that include branded or manufactured three-dimensional (3-D) printers with a camera, including but not limited to the Bambu Lab A1, A1 mini, P1S, P1P, X1C, and X1E printers, alone or in combination with Bambu Lab software, such as Bambu Studio and Bambu Handy, and all Bambu Lab Parts.

**C. Claim Charts (P.R. 3-1(c)) and Infringement Theory (P.R. 3-1(d))**

Attached to these contentions as Exhibits A-J, and incorporated herein in their entirety, are claim charts identifying where each element of each Asserted Claim is present in the Accused Instrumentalities.

Based on Stratasys’s current understanding of the Asserted Claims, 35 U.S.C. § 112(6)/(f) does not apply. Stratasys reserves the right to amend or supplement its contentions in light of the claim construction process or a claim construction order.

The contentions in Exhibits A-J are based on publicly available information about the Accused Instrumentalities and without the benefit of complete discovery. Accordingly, Plaintiff expects that these contentions may be subject to supplementation and/or amendment after further discovery and disclosure of Defendants’ non-infringement positions in order to focus the issues in this case. For example, Plaintiff may supplement these contentions in response to information learned during discovery to rebut allegations of non-infringement under the doctrine of equivalents. Additionally, Plaintiff expects that these contentions may be subject to amendment or supplementation to identify and accuse additional devices identified, released, developed, or made available after the date on which these contentions are served.

Stratasys asserts that Bambu Lab infringes each Asserted Claim both directly and

indirectly. In particular, Bambu Lab directly infringes each of the Asserted Claims by making, using, offering for sale, or selling the Accused Instrumentalities within the United States, or by importing the Accused Instrumentalities into the United States. For example, on information and belief, Bambu Lab uses the Accused Instrumentalities within the United States in a manner that infringes.

Bambu Lab also indirectly infringes each of the Asserted Claims by taking active steps to encourage and facilitate direct infringement by others (e.g., users, customers, partners, affiliates, subsidiaries, resellers, distributors and service providers) in the United States, with knowledge and specific intent that its efforts would result in the direct infringement. For example, Bambu actively induces infringement by designing, manufacturing, selling, or distributing the Accused Instrumentalities and then training others (e.g., users, customers, partners, affiliates, subsidiaries, resellers, distributors and service providers) on the use of its products and accompanying applications, including through the creation and dissemination of supporting materials, maintenance guides, troubleshooting guides, software, instructions, product manuals, and technical information (e.g., Bambu Lab Wiki). As another example, Defendants actively induce infringement by instructing, encouraging, or requiring their subsidiaries and affiliates and their users, customers, partners, affiliates, subsidiaries, resellers, distributors and service providers in the United States to use, sell, offer for sale in the United States, and import into the United States, without authorization, the Accused Instrumentalities, such as any Bambu Lab printer that is used in combination with the corresponding applications or controllers (e.g., the Bambu Studio and Bambu Handy, etc.). As yet another example, Defendants actively induce infringement through the creation and dissemination of promotional and marketing materials and instructional videos.

Bambu Lab also indirectly infringes each of the Asserted Claims by contributing to

infringement by selling or offering for sale the Accused Instrumentalities and/or other components (e.g., filament, automatic material system, build plate, etc.) in the United States and importing the Accused Instrumentalities and/or other components (e.g., filament, automatic material system, build plate, etc.) into the United States with knowledge that they are especially designed or adapted to operate in a manner that infringes and are not staple articles or commodities of commerce suitable for substantially non-infringing uses. For example, Bambu Lab contributes to infringement by others (e.g., users, customers, partners, affiliates, subsidiaries, resellers, distributors and service providers) in the United States by the promotion and/or sales of the infringing Accused Instrumentalities and/or other components (e.g., filament, automatic material system, build plate, etc.) to third parties.

Stratasys further contends that, based on its current understanding of the Asserted Claims and the Accused Instrumentalities, Bambu Lab infringes each of the Asserted Claims literally. To the extent that Bambu Lab contends that it does not literally infringe any claim element or step, Stratasys reserves the right to contend that any such element or step not literally present or performed by the Accused Instrumentalities is infringed under the doctrine of equivalents because any differences between such claim element or step and the accused element or step are insubstantial, and the Accused Instrumentalities perform the same function in the same way to achieve the same result as any such claim element or step. Stratasys reserves the right to amend its Second Amended Infringement Contentions to assert infringement under the doctrine of equivalents with additional specificity, particularly in light of any claim construction order, Bambu Lab's contentions, or any additional discovery, including but not limited to Bambu Lab's production of source code for the Accused Instrumentalities.

#### **D. Stratasys's Own Instrumentalities (P.R. 3-1(f))**

At this time, Stratasys does not intend to rely on the assertion that its own products or other

instrumentalities practice the claimed invention. Stratasys reserves the right to amend and/or supplement this disclosure as discovery progresses.

## II. PRODUCTION OF DOCUMENTS PURSUANT TO LOCAL PATENT RULE 3-2

Pursuant to Local Patent Rule 3-2, Stratasys identifies the following documents by Bates number that are being produced herewith:

- P.R. 3-2(a): At this time, Stratasys does not have any documents to disclose under P.R. 3-2(a). Stratasys reserves the right to amend and/or supplement this disclosure as discovery progresses.
- P.R. 3-2(b): See SSYSBL000002242–SSYSBL000002357. Stratasys reserves the right to amend and/or supplement this disclosure as discovery progresses.<sup>3</sup>
- P.R. 3-2(c): See SSYSBL000000001–SSYSBL000002241. Stratasys reserves the right to amend and/or supplement this disclosure as discovery progresses.

Dated: June 4, 2025

Respectfully submitted,

By: /s/Kevin J. Meek

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<sup>3</sup> Stratasys directs Defendants to Stratasys’s Response to Defendants’ Interrogatory No. 1 for the most up-to-date disclosure of documents known to Stratasys evidencing the conception, reduction to practice, design, and development of each claimed invention, which were created on or before the date of applications for the patents in suit or the priority dates identified pursuant to P.R. 3-1(e).

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