

Exhibit J

CHAMPION’S INFRINGEMENT CONTENTIONS FOR
U.S. PATENT NO. 11,905,895
AS ASSERTED AGAINST
GENERAC MODEL DF3500E ET AL.
FILING DATE: MARCH 14, 2023
PRIORITY DATE: JUNE 12, 2015

I. Generac Model DF3500E



II. Brief Description

Generac Model DF3500E is a dual fuel portable generator under Generac’s Powermate brand. Model DF3500E produces 4,375W (starting)/3,500W (running) when using gasoline and 4,000W (starting)/3,200W (running) when using liquified petroleum gas (“LPG”; also known as propane). Model DF3500E can operate at 50% load for up to 10 hours with its 4.5-gallon gasoline tank, up to 7 hours with a 20-pound LPG tank, or up to 10.5 hours with a 30-pound LPG tank. Model DF3500E has a battery-operated, push-button electric start and a recoil starter for its 208cc engine with a low oil shutoff. Model DF3500E also includes an automatic voltage regulator (“AVR”), four receptacles, circuit breaker protection, and a control panel with a digital multi-meter. Model DF3500E also has a fold-down locking handle and never flat wheels.

III. Accused Instrumentalities

Generac Model DF3500E and Generac Model DF7500E, which is also a dual fuel portable generator, are the Accused Instrumentalities that are alleged to infringe claims 1, 2, 6-8, 12-15, and 21 (the “Asserted Claims”) of U.S. Patent No. 11,905,895 (the “’895 Patent”). An image of Model DF7500E is provided below:



Generac Model DF7500E

IV. Protocol

For purposes of analyzing the Asserted Claims of the '895 Patent against the Accused Instrumentalities, Model DF3500E is considered representative. Model DF7500E includes the same components for switching between gaseous fuel and liquid fuel that infringe the claims of the '895 Patent in the same manner as discussed herein with respect to Model DF3500E and is thus an Accused Instrumentality. In both Accused Instrumentalities, the gaseous fuel is LPG, and the liquid fuel is gasoline.

Accordingly, while the claim chart provided below in Section VII is illustrated with reference to Model DF3500E, each element in the claim chart is found in Model DF7500E in the same manner as illustrated with reference to Model DF3500E.

V. Priority Dates

The priority date for the Asserted Claims of the '895 Patent is June 12, 2015.

VI. Statement Regarding Contributory and Induced Infringement

The claimed dual fuel engine operates on different fuels, like a liquid fuel (e.g., gasoline) or a gaseous fuel (e.g., LPG), but a gaseous fuel tank (e.g., an LPG tank), the gaseous fuel in the gaseous fuel tank, and liquid fuel in the liquid fuel tank (e.g., gasoline in a gasoline tank) are not required for infringement unless explicitly claimed in the Asserted Claims. Nonetheless, to the extent the Court construes any claim to require a gaseous fuel tank, gaseous fuel in the gaseous fuel tank, or liquid fuel in a liquid fuel tank, Generac contributes to or induces infringement by instructing its users to use a gaseous fuel tank and gaseous fuel and to fill the liquid fuel tank in order to operate the dual fuel engine.

Generac induces infringement of various Asserted Claims by specifically instructing its customers to attach an LPG tank to the engine and to put liquid fuel in the liquid fuel tank. [See Generac Owner's Manual for Model DF3500E at 9 (listing gasoline quality requirements and instructing to "4. Slowing add recommended

fuel”) and at 10 (providing instructions to “Connect LPG Tank” using the “LPG regulator connecting hose”).] To the extent the Court construes any Asserted Claim to require an LPG tank, gaseous fuel, or liquid fuel for infringement, when Generac’s customers use the Accused Instrumentalities with a filled LPG tank connected and with fuel in the liquid fuel tank, the infringement of any such Asserted Claims is completed. As such, Generac’s instructions to customers to connect a filled LPG tank and fill the liquid fuel tank before operation of the Accused Instrumentalities constitutes indirect infringement.

For the same reasons, Generac’s conduct also constitutes contributory infringement. To the extent the Court’s claim construction requires an LPG tank, gaseous fuel, or liquid fuel for infringement, Generac supplies its customers every component necessary to infringe the Asserted Claims except the filled LPG tank and the liquid fuel. Because the Owner’s Manual for Model DF3500E instructs customers to connect a filled LPG tank to the generator and to fill the liquid fuel tank with fuel, [*id.*], Generac knew that Model DF3500E would be used to infringe any applicable Asserted Claims. By connecting and using the Accused Instrumentalities with a filled LPG tank connected or with liquid fuel in the liquid fuel tank, Generac’s customers complete the infringement of such Asserted Claims. As such, Generac’s conduct also constitutes contributory infringement of such Asserted Claims.

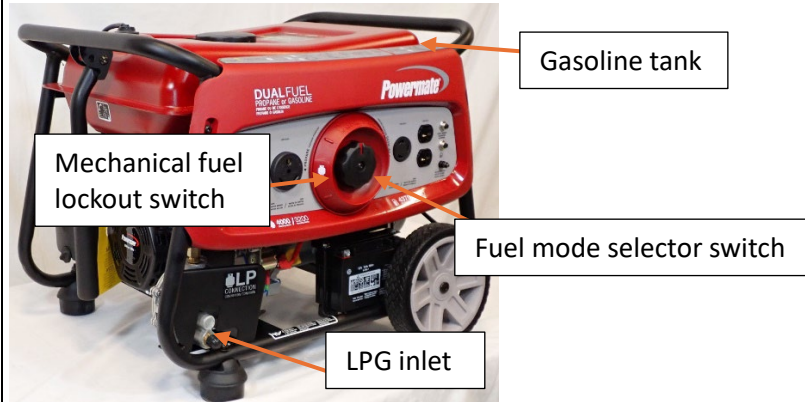
Champion incorporates this Section VI by reference into any element of any asserted claim that is construed to require attachment of a gaseous fuel tank, gaseous fuel, or filling of the liquid fuel tank with fuel.

VII. Claim Chart

'895 Patent Asserted Claims	Accused Instrumentality Components Illustrated with Respect to Model DF3500
1. (Preamble) A mechanical fuel lockout switch for a dual fuel engine comprising:	<p>Although not necessary for infringement¹, the preamble of claim 1 is found within Model DF3500E (and, thereby, Model DF7500E) as follows:</p> <p>A dual fuel engine is any engine that is configured to operate on at least two fuels. Model DF3500E includes a dual fuel engine that may run on either of two fuel sources. One fuel source is a gaseous fuel source in the form of a pressurized LPG tank that connects to the generator with an LPG hose. The other fuel source is a liquid fuel source in the form of an on-board gasoline tank. Both fuel sources feed fuel to the carburetor and engine. The mechanical fuel lockout switch includes a fuel mode selector switch (“selector switch”), which is a rotating knob allowing an operator to select a fuel source. The mechanical fuel lockout switch also includes an LPG valve and a gasoline valve along with gears and a solenoid switch and that control which fuel source is open and flowing to the engine and which one is closed and not flowing to the</p>

¹ The preambles of the Asserted Claims of the '895 Patent are not limiting and therefore should not be part of the infringement analysis. *See Artic Cat Inc. v. GEP Power Prods., Inc.*, 919 F.3d 1320, 1328 (Fed. Cir. 2019) (“We have long ruled that ‘a preamble is not limiting where a patentee defines a structurally complete invention in the claim body and uses the preamble only to state a purpose or intended use for the invention.’”) (quoting *Cataline Mktg. Int’l, Inc. v. Coolsavings.com, Inc.*, 289 F.3d 801, 808 (Fed. Cir. 2002)). Nonetheless, Champion provides general description of Model DF3500E next to the preamble to show how it meets the preamble and to assist in the infringement analysis by giving an overview of the Accused Instrumentalities. Champion incorporates this footnote by reference in the preambles of all the Asserted Claims.

engine. That is, the mechanical fuel lockout switch only allows one type of fuel to flow to the engine at a time.



Page 10 of the user manual discloses the LPG fuel source connection.

Connect LPG Tank

1. Remove safety plugs or caps from cylinder valve, generator mounted regulator, and regulator connecting hose ends.
2. With LPG tank closed, attach LPG regulator connecting hose into valve. Turn plastic coupling from the hose right (clockwise) to tighten hose assembly onto LPG tank. See [Figure 2-15](#).

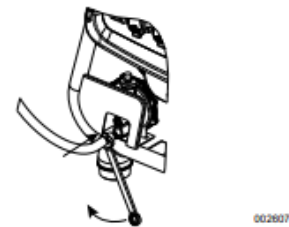
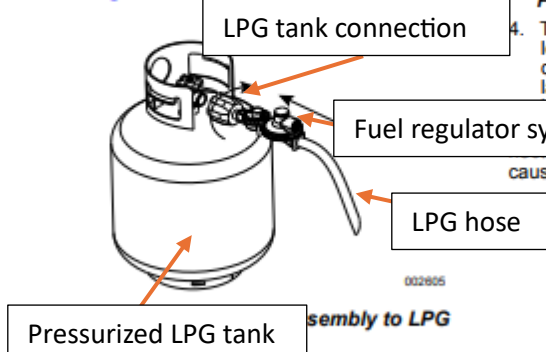


Figure 2-16. Connect Hose to Regulator

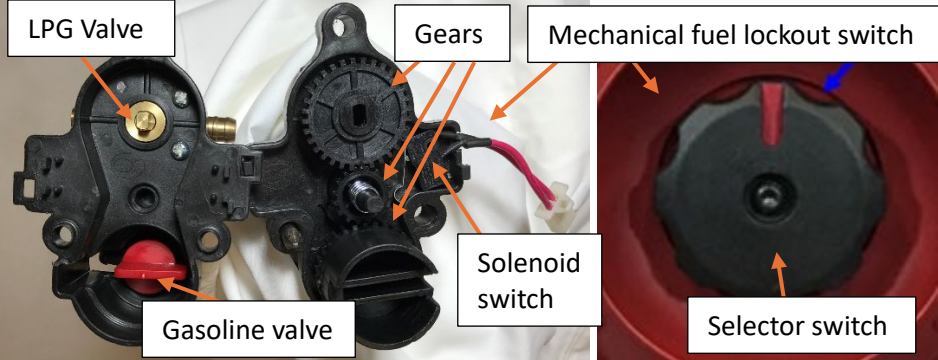
4. Turn LPG tank valve ON and check for leaks by spraying soapy water to check connections. If bubbles appear, become larger in size, or increase in number, a leak is present. Turn the cylinder so the connection in the valve and regulator won't cause sharp bends or kinks in hose. See [Figure 2-17](#).



3. Connect opposite regulator connecting hose end to generator at mounted LPG primary regulator with a 3/4 in. (19mm) wrench (not supplied). See [Figure 2-16](#).

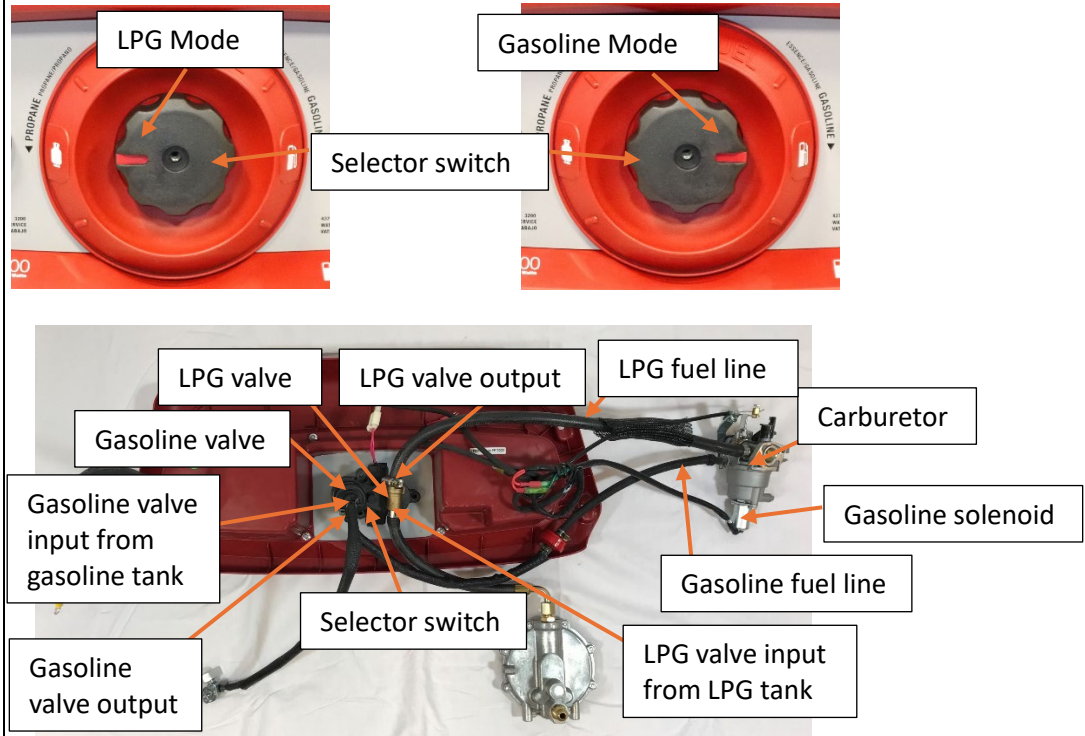


Figure 2-17. Turn LPG Tank Valve On

	 <p>The selector switch may be two positions to select operation gasoline or LPG fuel. The two positions are Gasoline Mode and LPG Mode. When the selector switch is turned to LPG Mode, the gears are rotated to activate the solenoid switch to close the gasoline solenoid. The rotating gears also open the LPG valve and close the gasoline valve at the same time. When the selector switch is turned to Gasoline Mode, the gears are rotated to deactivate the solenoid switch to open the gasoline solenoid and allows gasoline to flow. At the same time, the gears close the LPG valve and open the gasoline valve.</p>
<p>(a) a mechanical fuel valve actuable between a first position and a second position to selectively control fuel flow to the dual fuel engine from a first fuel source through a first fuel line and a second fuel source through a second fuel line, the mechanical fuel valve configured to:</p>	<p>Element (a) of claim 1 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally² as follows:</p> <p>Model DF3500E includes two mechanical fuel valves: an LPG valve and a gasoline valve (“gasoline valve”). Both the LPG valve and the gasoline valve have open and closed positions. The LPG valve, the gasoline valve, or both the LPG valve and the gasoline valve may be considered the claimed mechanical fuel valve. The gasoline and LPG valves control the flow of gasoline and LPG, respectively, in response to rotation of the selector switch. When the selector switch is in LPG Mode, the gasoline valve is closed, the gasoline solenoid is closed, and the LPG valve is open. As such, actuation of the selector switch to LPG Mode allows communication between the LPG tank and the engine via an LPG fuel line for engine operation on LPG and prevents communication between the gasoline tank and the engine.</p> <p>When the selector switch is in the Gasoline Mode, the gasoline valve and gasoline solenoid are open, and the LPG valve is closed. Accordingly, actuation of the selector switch to Gasoline Mode the allows communication between the gasoline tank and the</p>

² To the extent further discovery or claim construction reveals that any of the Accused Instrumentalities do not literally infringe the '895 Patent, Champion reserves the right to argue the Accused Instrumentalities infringe any of the Asserted Claims of the '895 Patent under the doctrine of equivalents. Champion incorporates this footnote by reference into each element of each Asserted Claim that Champion alleges is literally infringed by the Accused Instrumentalities.

engine via a gasoline fuel line for operation on gasoline and prevents communication between the LPG tank and the engine.



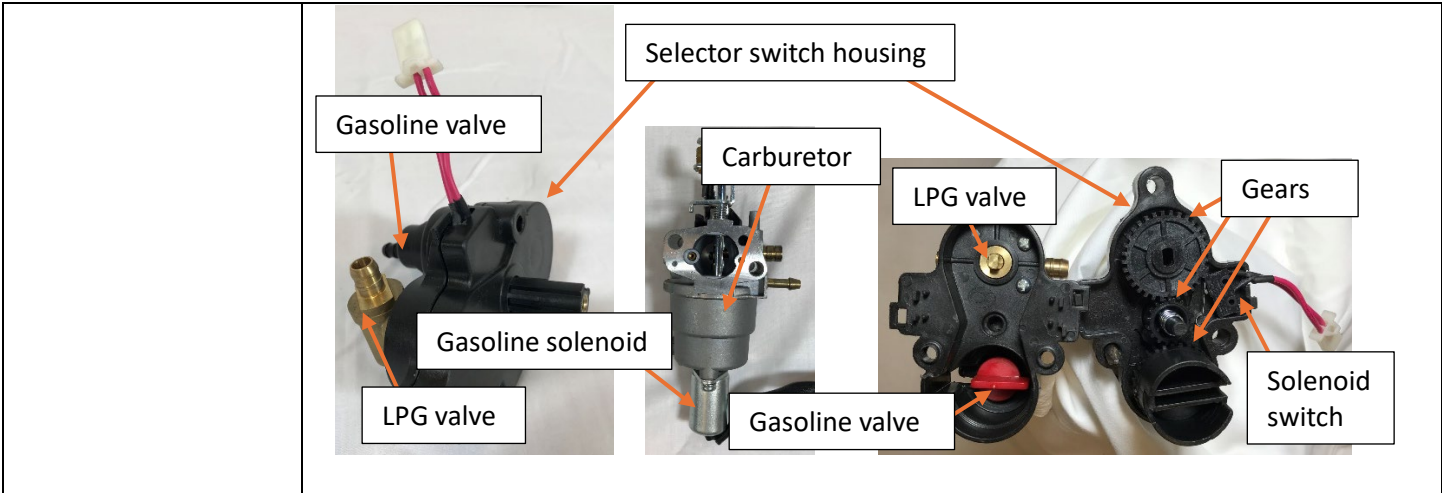
(a)(1) allow communication between the first fuel source and the dual fuel engine and prevent communication between the second fuel source and the dual fuel engine while in the first position, and

Element (a)(1) of claim 1 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:

Gasoline valve as mechanical fuel valve: When the selector switch is in LPG Mode, the gasoline valve is closed, the gasoline solenoid is closed, and the LPG valve is open. Therefore, the selector switch communicates LPG to the dual fuel engine and prevents communication between the gasoline tank and the dual fuel engine when the gasoline valve is closed and the LPG valve is open. Thus, the open position of the LPG valve and the closed position of the gasoline valve can be considered the first position of the mechanical fuel valve, with the LPG tank being the first fuel source and the gasoline tank being the second fuel source.

LPG valve as mechanical fuel valve: When the selector switch is in Gasoline Mode, the gasoline valve and gasoline solenoid are open, and the LPG valve is closed. Therefore, the selector switch communicates gasoline to the dual fuel engine and prevents communication between the LPG tank and the dual fuel engine when the LPG valve is closed and the gasoline valve is open. Thus, the open position of the gasoline valve and the closed position of the LPG valve can be considered the first position of the mechanical fuel valve, with the gasoline tank being the first fuel source and the LPG tank being the second fuel source.

<p>(a)(2) prevent communication between the first fuel source and the dual fuel engine while in the second position; and</p>	<p>Element (a)(2) of claim 1 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:</p> <p>Gasoline valve as mechanical fuel valve: When the selector switch is in Gasoline Mode, the gasoline valve and gasoline solenoid are open, and the LPG valve is closed. Therefore, the selector switch communicates gasoline to the dual fuel engine and prevents communication between the LPG tank and the dual fuel engine when the gasoline valve is open and the LPG valve is open. Thus, the open position of the gasoline valve and the closed position of the LPG valve can be considered the second position of the mechanical fuel valve, with the LPG tank being the first fuel source and the gasoline tank being the second fuel source.</p> <p>LPG valve as mechanical fuel valve: When the selector switch is in LPG Mode, the gasoline valve is closed, the gasoline solenoid is closed, and the LPG valve is open. Therefore, the selector switch communicates LPG to the dual fuel engine and prevents communication between the gasoline tank and the dual fuel engine when the gasoline valve is closed and the LPG valve is open. Thus, the open position of the LPG valve and the closed position of the gasoline valve can be considered the second position of the mechanical fuel valve, with the gasoline tank being the first fuel source and the LPG tank being the second fuel source.</p>
<p>(b) a fuel lockout apparatus coupled to the mechanical fuel valve and configured to:</p>	<p>Element (b) of claim 1 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:</p> <p>The selector switch is the fuel lockout apparatus. The selector switch includes the gears within its housing that are coupled to the LPG and gasoline fuel valves. When the selector switch is in LPG Mode, the gears open the LPG valve to enable the flow of LPG to the engine and close the gasoline valve and the gasoline solenoid to lockout the flow of gasoline to the engine while LPG can flow to the engine. When the selector switch is in Gasoline Mode, the gears close the gasoline valve and gasoline solenoid to enable the flow of gasoline to the engine and open the LPG valve to lockout the flow of LPG to the engine while gasoline can flow to the engine.</p>

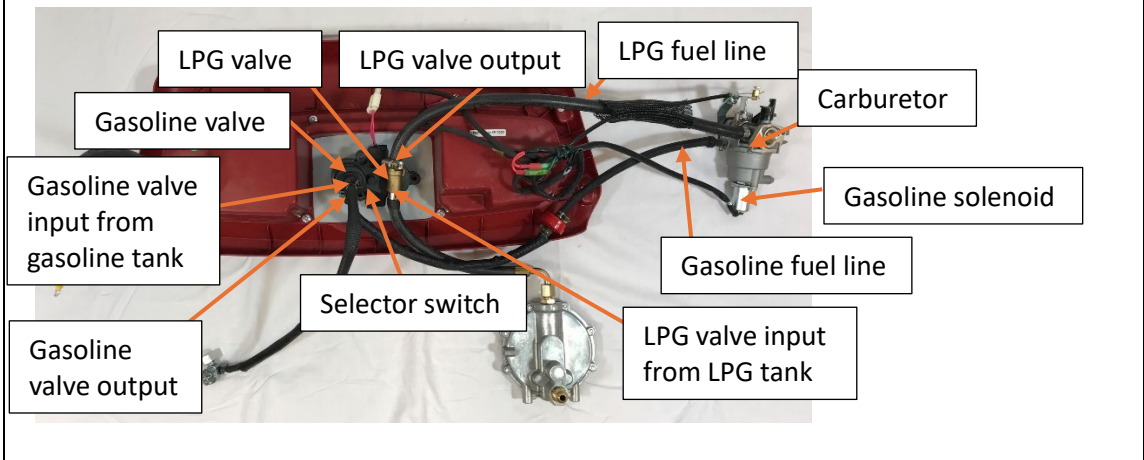


(b)(1) prevent the second fuel source from coupling to the second fuel line while the mechanical fuel valve is in the first position, and

Element (b)(1) of claim 1 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:

Gasoline valve as mechanical fuel valve: When the gasoline valve is in the open position and the LPG valve is in the closed position, the selector switch is in Gasoline Mode. Since the selector switch prevents the gasoline and LPG valves from being open at the same time, the selector switch prevents the LPG tank from coupling to the LPG fuel line while the gasoline valve is in the open position in Gasoline Mode.

LPG valve as mechanical fuel valve: Also, when the LPG valve is in the open position and the gasoline valve is in the closed position, the selector switch is in LPG Mode. Since the selector switch prevents the gasoline and LPG valves from being open at the same time, the selector switch prevents the gasoline tank from coupling to the gasoline fuel line while the gasoline valve is in the open position in Gasoline Mode.

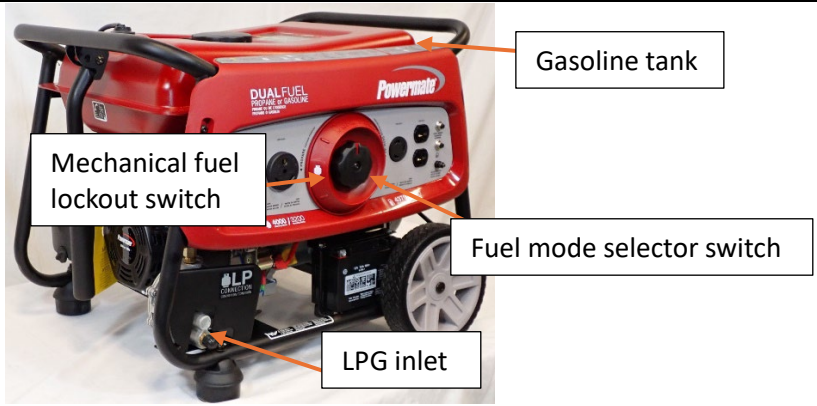


(b)(2) permit the second fuel source to couple to the second

Element (b)(2) of claim 1 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:

<p>fuel line while the mechanical fuel valve is in the second position.</p>	<p>When the LPG valve is in the open position and the gasoline valve is in the closed position, the selector switch is in LPG Mode. Thus, the selector switch permits the LPG tank to couple to the LPG fuel line while the gasoline valve is in the closed position.</p> <p>Also, when the gasoline valve is in the open position and the LPG valve is in the closed position, the selector switch is in Gasoline Mode. Thus, the selector switch permits the gasoline tank to couple to the gasoline fuel line while the LPG valve is in the closed position.</p>
<p>2. The mechanical fuel lockout switch of claim 1 wherein the fuel lockout apparatus prevents actuation of the mechanical fuel valve to the first position when the second fuel source is in communication with the dual fuel engine.</p>	<p>Claim 2 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:</p> <p>Champion incorporates by reference in claim 2 the contentions set forth above for claim 1.</p> <p>As explained above, the selector switch actuates the gasoline and LPG valves simultaneously. Thus, when the selector switch is in either Gasoline Mode or LPG Mode, whichever of the gasoline or LPG valves is closed to open without closing the already open valve. Thus, the selector switch prevents actuation of the gasoline and LPG valves to the open position while the other valve is communicating its respective fuel source to the engine.</p>
<p>6. The mechanical fuel lockout switch of claim 1 wherein the mechanical fuel valve and the fuel lockout apparatus operate together to ensure that fuel from the first fuel source and fuel from the second fuel source are not simultaneously delivered to the dual fuel engine.</p>	<p>Claim 6 is found within Model DF3500E (and, thereby, Model DF7500E) as follows:</p> <p>Champion incorporates by reference in claim 6 the contentions set forth above for claim 1.</p> <p>As explained above, the selector switch actuates the gasoline and LPG valves simultaneously such that only one of the gasoline and LPG valves can be open at a given time. Therefore, the selector switch, the gasoline fuel valve and the LPG valve operate together to ensure that gasoline from the gasoline tank and LPG from the LPG tank are not simultaneously delivered to the dual fuel engine.</p>
<p>7. (Preamble) The mechanical fuel lockout switch of claim 6 wherein the</p>	<p>Although not necessary for infringement, the preamble of claim 7 is found within Model DF3500E (and, thereby, Model DF7500E) as follows:</p> <p>Champion incorporates by reference in claim 7 the contentions set forth above for claims 1 and 6.</p>

mechanical fuel valve is configured to:	The mechanical fuel valve mentioned above is further described below.
(a) provide liquid fuel from a liquid fuel tank of the first fuel source to the dual fuel engine while in the first position, and	<p>Element (a) of claim 7 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:</p> <p>When the gasoline valve is open and the LPG valve is closed with the selector switch in Gasoline Mode, the gasoline valve provides gasoline from the gasoline tank to the engine.</p>
(b) provide gaseous fuel from a pressurized fuel container of the second fuel source to the dual fuel engine while in the second position.	<p>Element (b) of claim 7 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:</p> <p>When the gasoline valve is closed and the LPG valve is open with the selector switch in LPG Mode, the LPG valve provides LPG from the pressurized fuel tank to the engine.</p>
8. (Preamble) A mechanical fuel lockout switch for a dual fuel engine comprising:	<p>Although not necessary for infringement, the preamble of claim 8 is found within Model DF3500E (and, thereby, Model DF7500E) as follows:</p> <p>A dual fuel engine is any engine that is configured to operate on at least two fuels. Model DF3500E includes a dual fuel engine that may run on either of two fuel sources. One fuel source is a gaseous fuel source in the form of a pressurized LPG tank that connects to the generator with an LPG hose. The other fuel source is a liquid fuel source in the form of an on-board gasoline tank. Both fuel sources feed fuel to the carburetor and engine. The mechanical fuel lockout switch includes a fuel mode selector switch (“selector switch”), which is a rotating knob allowing an operator to select a fuel source. The mechanical fuel lockout switch also includes an LPG valve and a gasoline valve along with gears and a solenoid switch and that control which fuel source is open and flowing to the engine and which one is closed and not flowing to the engine. That is, the mechanical fuel lockout switch only allows one type of fuel to flow to the engine at a time.</p>



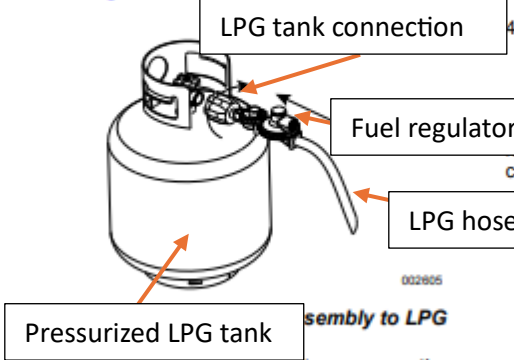
Page 10 of the user manual discloses the LPG fuel source connection.

Connect LPG Tank

1. Remove safety plugs or caps from cylinder valve, generator mounted regulator, and regulator connecting hose ends.
2. With LPG tank closed, attach LPG regulator connecting hose into valve. Turn plastic coupling from the hose right (clockwise) to tighten hose assembly onto LPG tank. See [Figure 2-15](#).



Figure 2-16. Connect Hose to Regulator

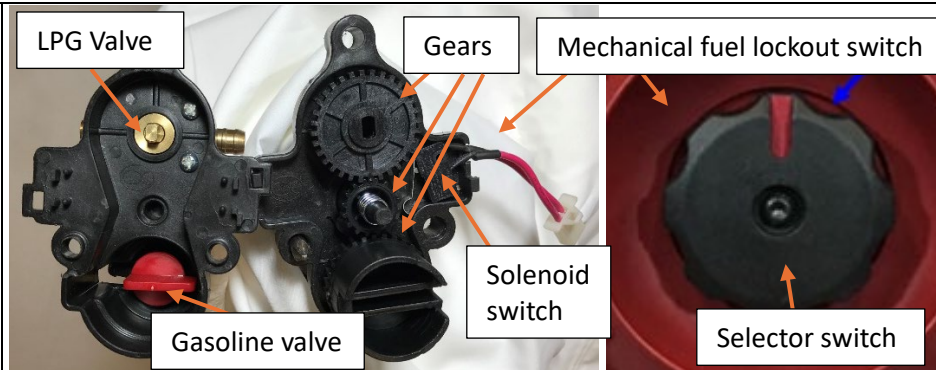


4. Turn LPG tank valve ON and check for leaks by spraying soapy water to check connections. If bubbles appear, become larger in size, or increase in number, a position cylinder so the connection in the valve and regulator won't cause sharp bends or kinks in hose. See [Figure 2-17](#).

3. Connect opposite regulator connecting hose end to generator at mounted LPG primary regulator with a 3/4 in. (19mm) wrench (not supplied). See [Figure 2-16](#).



Figure 2-17. Turn LPG Tank Valve On



The selector switch may be two positions to select operation gasoline or LPG fuel. The two positions are Gasoline Mode and LPG Mode. When the selector switch is turned to LPG Mode, the gears are rotated to activate the solenoid switch to close the gasoline solenoid. The rotating gears also open the LPG valve and close the gasoline valve at the same time. When the selector switch is turned to Gasoline Mode, the gears are rotated to deactivate the solenoid switch to open the gasoline solenoid and allows gasoline to flow. At the same time, the gears close the LPG valve and open the gasoline valve.

(a) a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the dual fuel engine from a first fuel source through a first fuel line and a second fuel source through a second fuel line, the mechanical fuel valve configured to:

Element (a) of claim 8 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:

Model DF3500E includes two mechanical fuel valves: an LPG valve and a gasoline valve (“gasoline valve”). Both the LPG valve and the gasoline valve have open and closed positions. The LPG valve, the gasoline valve, or both the LPG valve and the gasoline valve may be considered the claimed mechanical fuel valve. The gasoline and LPG valves control the flow of gasoline and LPG, respectively, in response to rotation of the selector switch. When the selector switch is in LPG Mode, the gasoline valve is closed, the gasoline solenoid is closed, and the LPG valve is open. As such, actuation of the selector switch to LPG Mode allows communication between the LPG tank and the engine via an LPG fuel line for engine operation on LPG and prevents communication between the gasoline tank and the engine.

When the selector switch is in the Gasoline Mode, the gasoline valve and gasoline solenoid are open, and the LPG valve is closed. Accordingly, actuation of the selector switch to Gasoline Mode the allows communication between the gasoline tank and the engine via a gasoline fuel line for operation on gasoline and prevents communication between the LPG tank and the engine.

<p>(a)(1) allow communication between the first fuel source and the dual fuel engine and prevent communication between the second fuel source and the dual fuel engine while the first position, and</p>	<p>Element (a)(1) of claim 8 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:</p> <p>Gasoline valve as mechanical fuel valve: When the selector switch is in LPG Mode, the gasoline valve is closed, the gasoline solenoid is closed, and the LPG valve is open. Therefore, the selector switch communicates LPG to the dual fuel engine and prevents communication between the gasoline tank and the dual fuel engine when the gasoline valve is closed and the LPG valve is open. Thus, the open position of the LPG valve and the closed position of the gasoline valve can be considered the first position of the mechanical fuel valve, with the LPG tank being the first fuel source and the gasoline tank being the second fuel source.</p> <p>LPG valve as mechanical fuel valve: When the selector switch is in Gasoline Mode, the gasoline valve and gasoline solenoid are open, and the LPG valve is closed. Therefore, the selector switch communicates gasoline to the dual fuel engine and prevents communication between the LPG tank and the dual fuel engine when the LPG valve is closed and the gasoline valve is open. Thus, the open position of the gasoline valve and the closed position of the LPG valve can be considered the first position of the mechanical fuel valve, with the gasoline tank being the first fuel source and the LPG tank being the second fuel source.</p>
<p>(a)(2) prevent communication</p>	<p>Element (a)(2) of claim 1 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:</p>

between the first fuel source and the dual fuel engine while in the second position; and

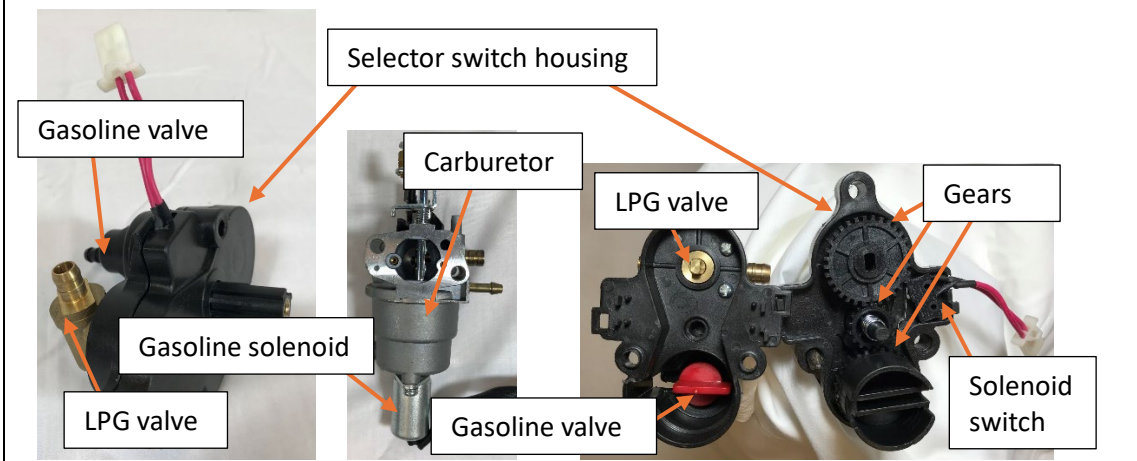
Gasoline valve as mechanical fuel valve: When the selector switch is in Gasoline Mode, the gasoline valve and gasoline solenoid are open, and the LPG valve is closed. Therefore, the selector switch communicates gasoline to the dual fuel engine and interrupts communication between the LPG tank and the dual fuel engine when the gasoline valve is open and the LPG valve is open. Thus, the open position of the gasoline valve and the closed position of the LPG valve can be considered the second position of the mechanical fuel valve, with the LPG tank being the first fuel source and the gasoline tank being the second fuel source.

LPG valve as mechanical fuel valve: LPG valve as mechanical fuel valve: When the selector switch is in LPG Mode, the gasoline valve is closed, the gasoline solenoid is closed, and the LPG valve is open. Therefore, the selector switch communicates LPG to the dual fuel engine and interrupts communication between the gasoline tank and the dual fuel engine when the gasoline valve is closed and the LPG valve is open. Thus, the open position of the LPG valve and the closed position of the gasoline valve can be considered the second position of the mechanical fuel valve, with the gasoline tank being the first fuel source and the LPG tank being the second fuel source.

(b) a fuel lockout apparatus coupled to the mechanical fuel valve and configured to prevent actuation of the mechanical fuel valve to the first position when the second fuel source is in communication with the dual fuel engine.

Element (b) of claim 8 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:

The selector switch includes the gears within its housing that are coupled to the LPG and gasoline fuel valves. When the selector switch is in LPG Mode, the gears open the LPG valve to enable the flow of LPG to the engine and close the gasoline valve and the gasoline solenoid to lockout the flow of gasoline to the engine while LPG can flow to the engine. When the selector switch is in Gasoline Mode, the gears close the gasoline valve and gasoline solenoid to enable the flow of gasoline to the engine and open the LPG valve to lockout the flow of LPG to the engine while gasoline can flow to the engine.

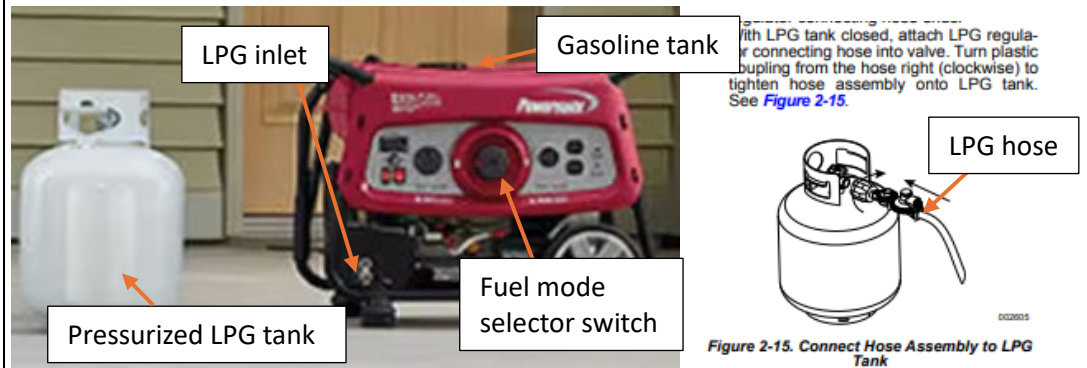


	<p>The selector switch actuates the gasoline and LPG valves simultaneously. Thus, when the selector switch is in either Gasoline Mode or LPG Mode, whichever of the gasoline or LPG valves is closed to open without closing the already open valve. Thus, the selector switch prevents actuation of the gasoline and LPG valves to the open position while the other valve is communicating its respective fuel source to the engine.</p>
<p>12. The mechanical fuel lockout switch of claim 8 wherein the mechanical fuel valve and the fuel lockout apparatus operate together to ensure that fuel from the first fuel source and fuel from the second fuel source are not simultaneously delivered to the dual fuel engine.</p>	<p>Claim 12 is found within Model DF3500E (and, thereby, Model DF7500E) as follows:</p> <p>Champion incorporates by reference in claim 12 the contentions set forth above for claim 8.</p> <p>As explained above, the selector switch actuates the gasoline and LPG valves simultaneously such that only one of the gasoline and LPG valves can be open at a given time. Therefore, the selector switch, the gasoline fuel valve and the LPG valve operate together to ensure that gasoline from the gasoline tank and LPG from the LPG tank are not simultaneously delivered to the dual fuel engine.</p>
<p>13. (Preamble) The mechanical fuel lockout switch of claim 12 wherein the mechanical fuel valve is configured to:</p>	<p>Although not necessary for infringement, the preamble of claim 7 is found within Model DF3500E (and, thereby, Model DF7500E) as follows:</p> <p>Champion incorporates by reference in claim 13 the contentions set forth above for claims 8 and 12.</p>
<p>(a) provide liquid fuel from a liquid fuel tank of the first fuel source to the dual fuel engine while in the first position, and</p>	<p>Element (a) of claim 13 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:</p> <p>When the gasoline valve is open and the LPG valve is closed with the selector switch in Gasoline Mode, the gasoline valve provides gasoline from the gasoline tank to the engine.</p>
<p>(b) provide gaseous fuel from a pressurized fuel container of the second fuel source to the dual fuel engine while in the second position.</p>	<p>Element (b) of claim 13 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:</p> <p>When the LPG valve is open and the gasoline valve is closed with the selector switch in LPG Mode, the LPG valve provides LPG from the pressurized LPG tank to the engine.</p>

14. (Preamble) A dual fuel generator and fuel delivery system comprising:

Although not necessary for infringement, the preamble of claim 14 is found within Model DF3500E (and, thereby, Model DF7500E) as follows:

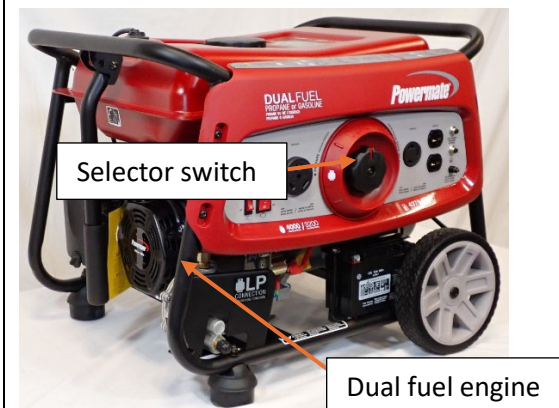
Model DF3500E includes a dual fuel engine that uses either LPG or gasoline. A fuel mode selector switch (“selector switch”) is provided to allow a user to toggle between gasoline from the gasoline tank and LPG from the LPG bottle.

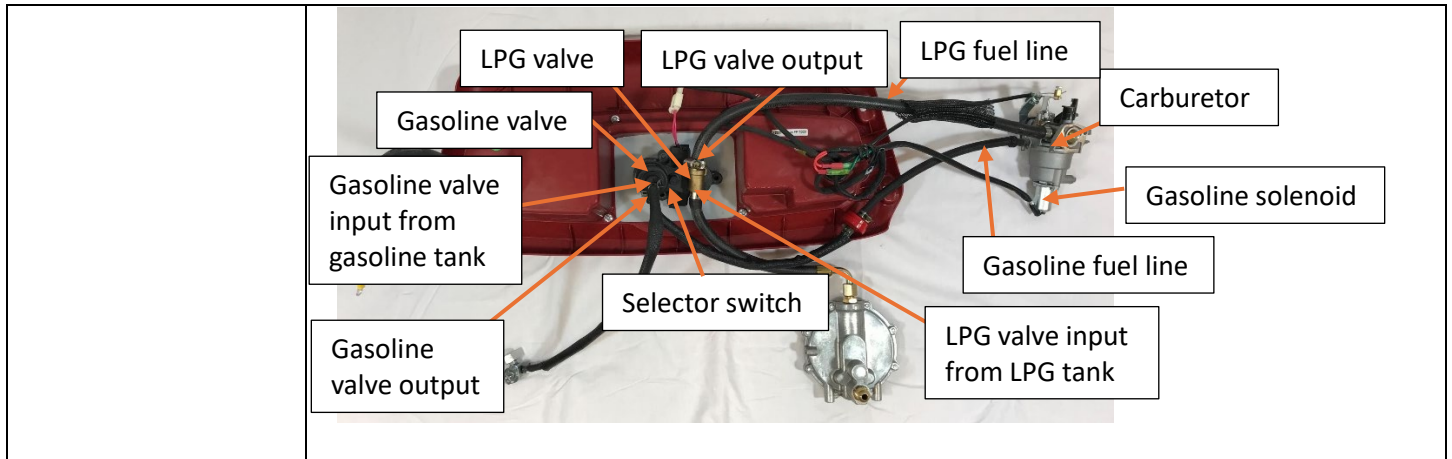


(a) a dual fuel generator configured to operate on a liquid fuel supplied from a liquid fuel source through a liquid fuel line and a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line;

Element (a) of claim 14 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:

Model DF3500E includes a dual fuel engine configured to operate on liquid gasoline supplied from the on-board gasoline tank (the liquid fuel source) through a gasoline fuel line and on gaseous LPG supplied from a pressurized LPG tank (the pressurized fuel source) through an LPG fuel line. Both fuel sources feed fuel to the carburetor and engine through their respective liquid and gaseous fuel lines.

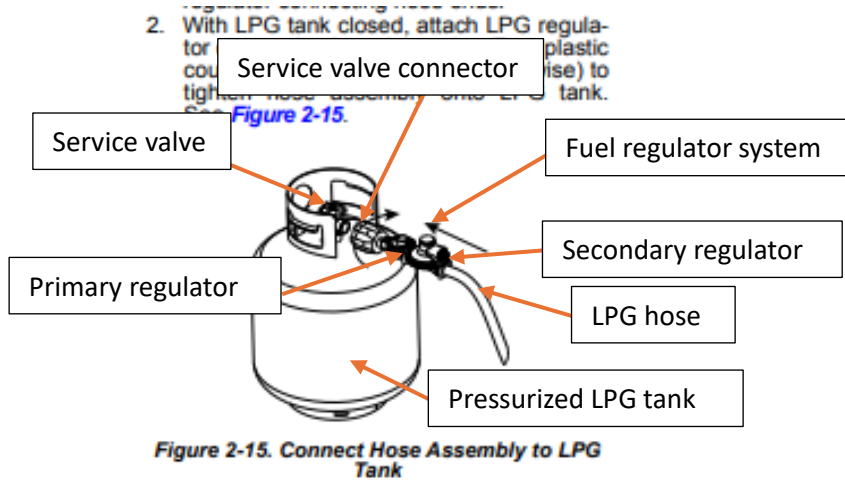




(b) a fuel regulator system located off board the dual fuel generator, the fuel regulator system comprising:

Element (b) of claim 14 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:

The off-board fuel regulator system is included with the generator on the LPG hose, as pictured below from the user manual. The fuel regulator system includes a primary pressure regulator and a secondary pressure regulator. A service valve connector couples the LPG hose and fuel regulator system to the service valve of a pressurized LPG tank.

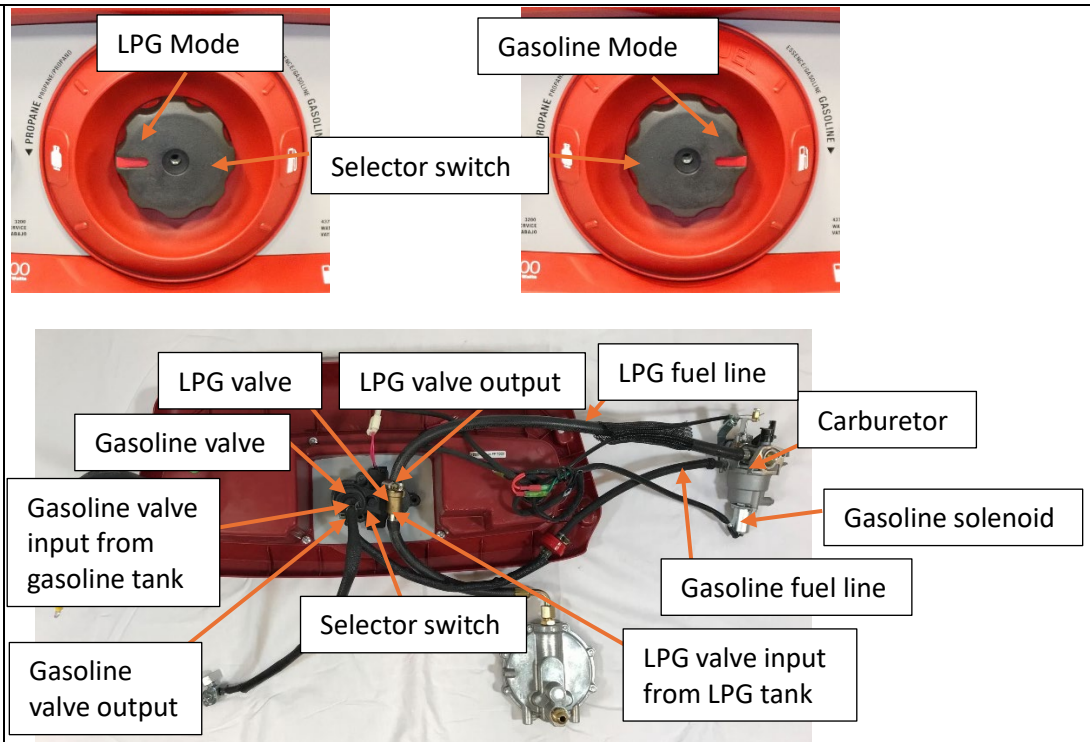


(b)(1) a primary pressure regulator couplable to a service valve of the pressurized fuel source and configured to regulate the gaseous fuel

Element (b)(1) of claim 14 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:

The primary regulator is coupled to the service valve with the service valve connector and regulates the LPG from the LPG tank to a reduced pressure.

<p>supplied from the pressurized fuel source to a reduced pressure, and</p>	
<p>(b)(2) a secondary pressure regulator couplable to the primary pressure regulator and configured to regulate the gaseous fuel supplied from the primary pressure regulator to a desired pressure for delivery through the gaseous fuel line to operate the dual fuel generator;</p>	<p>Element (b)(2) of claim 14 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:</p> <p>The secondary regulator is coupled to the primary regulator and regulates the LPG pressure from the first reduced pressure to a desired pressure for delivery through the LPG line to operate the generator.</p>
<p>(c) a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the dual fuel generator from the liquid fuel source through the liquid fuel line and the pressurized fuel source through the gaseous fuel line, the mechanical fuel valve configured to open and close the liquid fuel line to selectively control fuel flow from the liquid fuel source to the dual fuel generator; and</p>	<p>Element (c) of claim 14 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:</p> <p>Model DF3500E includes two mechanical fuel valves: an LPG valve and a gasoline valve (“gasoline valve”). Both the LPG valve and the gasoline valve have open and closed positions. The LPG valve, the gasoline valve, or both the LPG valve and the gasoline valve may be considered the claimed mechanical fuel valve. The gasoline and LPG valves control the flow of gasoline and LPG, respectively, in response to rotation of the selector switch. When the selector switch is in LPG Mode, the gasoline valve is closed, the gasoline solenoid is closed, and the LPG valve is open. As such, actuation of the selector switch to LPG Mode allows communication between the LPG tank and the engine via an LPG fuel line for engine operation on LPG and prevents communication between the gasoline tank and the engine.</p> <p>When the selector switch is in the Gasoline Mode, the gasoline valve and gasoline solenoid are open, and the LPG valve is closed. Accordingly, actuation of the selector switch to Gasoline Mode the allows communication between the gasoline tank and the engine via a gasoline fuel line for operation on gasoline and prevents communication between the LPG tank and the engine.</p>

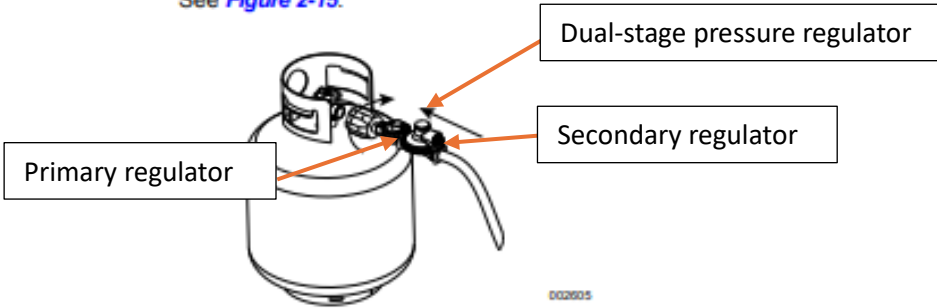


(d) a fuel lockout apparatus coupled to the mechanical fuel valve and configured to:

Element (d) of claim 14 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:

The selector switch is the fuel lockout apparatus. The selector switch includes the gears within its housing that are coupled to the LPG and gasoline fuel valves. When the selector switch is in LPG Mode, the gears open the LPG valve to enable the flow of LPG to the engine and close the gasoline valve and the gasoline solenoid to lockout the flow of gasoline to the engine while LPG can flow to the engine. When the selector switch is in Gasoline Mode, the gears close the gasoline valve and gasoline solenoid to enable the flow of gasoline to the engine and open the LPG valve to lockout the flow of LPG to the engine while gasoline can flow to the engine.

<p>(d)(1) prevent the pressurized fuel source from coupling to the gaseous fuel line while the liquid fuel line is open, and</p>	<p>Element (d)(1) of claim 14 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:</p> <p>When the gasoline valve is in the open position, and the LPG valve is in the closed position, the selector switch is in Gasoline Mode. Since the selector switch prevents the gasoline and LPG valves from being open at the same time, the selector switch prevents the LPG tank from coupling to the LPG fuel line while the gasoline valve is in the open position in Gasoline Mode.</p>
<p>(d)(2) permit the pressurized fuel source to couple to the gaseous fuel line while the liquid fuel line is closed by the mechanical fuel valve.</p>	<p>Element (d)(2) of claim 14 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:</p> <p>When the LPG valve is in the open position, and the gasoline valve is in the closed position, the selector switch is in LPG Mode. Thus, the selector switch permits the LPG tank to couple to the LPG fuel line while the gasoline valve is in the closed position.</p>
<p>15. The dual fuel generator and fuel delivery system of claim 14 wherein the fuel lockout apparatus is further configured to prevent the mechanical fuel valve from opening the liquid fuel line while the fuel regulator system is</p>	<p>Claim 15 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows:</p> <p>Champion incorporates by reference in claim 15 the contentions set forth above for claim 14.</p> <p>As explained above, the selector switch actuates the gasoline and LPG valves simultaneously. Thus, when the selector switch is in either Gasoline Mode or LPG Mode, whichever of the gasoline or LPG valves is closed to open without closing the already open valve. Thus, the selector switch prevents the gasoline valve from opening the gasoline fuel line while the generator receives fuel from the pressurized LPG tank</p>

<p>coupled to the gaseous fuel line.</p>	<p>because, when the selector switch opens the gasoline valve, the generator will no longer er receiving fuel from the LPG fuel line.</p>
<p>21. (Preamble) The dual fuel generator and fuel delivery system of claim 14 wherein:</p>	<p>Claim 21 is found within Model DF3500E (and, thereby, Model DF7500E) as follows: Champion incorporates by reference in claim 21 the contentions set forth above for claim 14.</p>
<p>(a) the fuel regulator system comprises a dual stage pressure regulator; and</p>	<p>Element (a) of claim 21 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows: As shown below, the fuel regulator system includes a dual stage regulator.</p> <p style="text-align: center;">2. With LPG tank closed, attach LPG regulator connecting hose into valve. Turn plastic coupling from the hose right (clockwise) to tighten hose assembly onto LPG tank. See <i>Figure 2-15</i>.</p> <div style="text-align: center;">  </div> <p style="text-align: center;">Figure 2-15. Connect Hose Assembly to LPG Tank</p>
<p>(b) the primary and secondary pressure regulators are integral components of the dual stage pressure regulator.</p>	<p>Element (b) of claim 21 is found within Model DF3500E (and, thereby, Model DF7500E) directly and literally as follows: As shown above, both the primary and secondary regulators are integral components of the dual stage regulator.</p>