

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

SHARKNINJA OPERATING LLC and  
SHARKNINJA SALES COMPANY,

Plaintiffs,

v.

RJ BRANDS, LLC  
*d/b/a* CHEFMAN,

Defendant.

Case No. \_\_\_\_\_

**COMPLAINT**

**JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT**

**I. INTRODUCTION AND NATURE OF THE ACTION**

1. Plaintiffs SharkNinja Operating LLC and SharkNinja Sales Company (collectively, SharkNinja”) bring this action for patent infringement against Defendant RJ Brands, LLC, *d/b/a* Chefman (“Chefman”).

2. SharkNinja began three decades ago with the mission of providing more efficient, user-friendly, and affordable household appliances. From its start as a one-person company, SharkNinja has grown into a market leader. SharkNinja is now a global brand with more than 20 categories of home appliance products, including floorcare products, environmental products such as fans and purifiers, kitchen appliances, and, relevant to this case, indoor cooking systems. SharkNinja has eight offices and thousands of employees in the United States. SharkNinja’s headquarters, located in Massachusetts, are shown below:



3. SharkNinja has a particular history as a pioneer and innovator. SharkNinja has devoted significant resources to research and development, including a team of more than 800 design engineers who focus on developing new products and features to improve and revolutionize household appliances. This work has been overwhelmingly successful: SharkNinja has been awarded more than 4,500 patents on its home appliance innovations.

4. The SharkNinja patents at issue in this action (“the Asserted SharkNinja Patents”) are part of SharkNinja’s history of innovation. The Asserted SharkNinja Patents relate to novel innovations in indoor cooking systems—a growing market throughout the country and the world. SharkNinja has been in the kitchen appliance market for more than 15 years, since 2008, and has been granted dozens of patents in this area, including the Asserted SharkNinja Patents.

5. The Asserted SharkNinja Patents are U.S. Patent Nos. 11,033,146 (“the ’146 patent”) (Ex. A); 11,766,152 (the “’152 patent”) (Ex. B); D918,654 (“the ’654 patent”) (Ex. C); 11,389,026 (the “’026 patent”) (Ex. D), 11,672,377 (the “’377 patent”) (Ex. E); and D986,669 (the “’669 patent”) (Ex. F). The ’146, ’152, and ’654 patents relate to novel indoor cooking systems such as grills and air fryers. The patents involve, among other claimed inventions, a

unique grill plate that changed the way air moves through the system to better heat the food being cooked. The inventions of these patents have achieved considerable market success: SharkNinja uses the '146 and '152 technology in its Ninja<sup>®</sup> Indoor Grill & Air Fryers, including the Ninja<sup>®</sup> Foodi<sup>®</sup> XL 6-in-1 Indoor Grill & Air Fryer (DG500 Series), Ninja<sup>®</sup> Foodi<sup>®</sup> 6-in-1 Indoor Grill & Air Fryer (EG200 Series), Ninja<sup>®</sup> Foodi<sup>®</sup> 5-in-1 Indoor Grill & Air Fryer (AG300 Series), Ninja<sup>®</sup> Foodi<sup>®</sup> 5-in-1 Indoor Grill & Air Fryer with Integrated Smart Probe (AG400 Series), Ninja<sup>®</sup> Foodi<sup>®</sup> XL 6-in-1 Indoor Grill & Air Fryer (BG500 Series), and Ninja<sup>®</sup> Foodi<sup>®</sup> 4-in-1 Indoor Grill & Air Fryer (FG500 Series). SharkNinja uses the '654 design in its Ninja<sup>®</sup> Foodi<sup>®</sup> 5-in-1 Indoor Grill & Air Fryer (AG300 Series) and Ninja<sup>®</sup> Foodi<sup>®</sup> 5-in-1 Indoor Grill & Air Fryer with Integrated Smart Probe (AG400 Series).

6. The '026, '377, and '669 patents relate to a novel dual cooking zone home cooking system. The patents involve, among other claimed inventions, a single device with two cooking containers, each with their own heating element, independently controllable from each other. The inventions allow an indoor cooking system to cook food at two different temperatures at the same time. These inventions also have been extremely successful in the marketplace: SharkNinja uses this technology and design in its Ninja<sup>®</sup> Foodi<sup>®</sup> 2-Basket Air Fryer with DualZone<sup>™</sup> Technology, including the 6-in-1 10-Qt DZ550 Series, the 6-in-1 8-Qt DZ201 Series, the 6-in-1 10-Qt DZ401 Series, the 4-in-1 8-Qt DZ100 Series, and the 5-in-1 6-Qt DZ090 Series.

7. SharkNinja brings this suit because Chefman has infringed and continues to infringe the Asserted SharkNinja Patents. As described in detail below, after SharkNinja released products that use the inventions of the Asserted SharkNinja Patents, Chefman released copycat products that include the same functionality and design that SharkNinja invented and

patented. In doing so, Chefman infringed each of the Asserted SharkNinja Patents, and it continues to infringe today.

8. Chefman's infringement of the Asserted SharkNinja Patents has caused SharkNinja significant, irreparable, and ongoing harm, including because Chefman is using SharkNinja's patents to directly compete with and take sales from SharkNinja. Chefman's Electric Indoor Air Fryer + Grill product, which infringes the '146, '152, and '654 patents, competes directly with SharkNinja's Ninja<sup>®</sup> Indoor Grill & Air Fryers, including the Ninja<sup>®</sup> Foodi<sup>®</sup> XL 6-in-1 Indoor Grill & Air Fryer (DG500 Series), Ninja<sup>®</sup> Foodi<sup>®</sup> 6-in-1 Indoor Grill & Air Fryer (EG200 Series), Ninja<sup>®</sup> Foodi<sup>®</sup> 5-in-1 Indoor Grill & Air Fryer (AG300 Series), Ninja<sup>®</sup> Foodi<sup>®</sup> 5-in-1 Indoor Grill & Air Fryer with Integrated Smart Probe (AG400 Series), Ninja<sup>®</sup> Foodi<sup>®</sup> XL 6-in-1 Indoor Grill & Air Fryer (BG500 Series), and Ninja<sup>®</sup> Foodi<sup>®</sup> 4-in-1 Indoor Grill & Air Fryer (FG500 Series). Chefman's Dual Air Fryer product, which infringes the '026, '377, and '669 patents, competes directly with SharkNinja's Ninja<sup>®</sup> Foodi<sup>®</sup> 2-Basket Air Fryer with DualZone<sup>™</sup> Technology, including the 6-in-1 10-Qt DZ550 Series, the 6-in-1 8-Qt DZ201 Series, the 6-in-1 10-Qt DZ401 Series, the 4-in-1 8-Qt DZ100 Series, and the 5-in-1 6-Qt DZ090 Series. SharkNinja would prefer to compete in the marketplace—but because Chefman is using SharkNinja's inventions without permission to unfairly compete, take sales from, and irreparably harm SharkNinja, SharkNinja must act to protect its innovations and patents.

9. SharkNinja thus brings this action under the patent laws of the United States, Title 35 United States Code, including 35 U.S.C. §§ 271, 284–285, and 289 to remedy Chefman's continued infringement and the damages SharkNinja has suffered and continues to suffer as a result of Chefman's infringement.

## II. PARTIES, JURISDICTION, AND VENUE

10. Plaintiff SharkNinja Operating LLC is a limited liability company organized and existing under the laws of Delaware, having a principal place of business at 89 A Street, Suite 100, Needham, Massachusetts 02494.

11. Plaintiff SharkNinja Sales Company is a Delaware Corporation organized and existing under the laws of Delaware, having a principal place of business at 89 A Street, Suite 100, Needham, Massachusetts 02494. SharkNinja Sales Company is a wholly owned subsidiary of SharkNinja Operating LLC.

12. On information and belief, defendant Chefman is a corporation organized and existing under the laws of the State of New Jersey and having its principal place of business at 200 Performance Drive, Mahwah, NJ 07495.

13. This is an action arising under the patent laws of the United States, 35 U.S.C. § 1 et seq. Accordingly, this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

14. This Court has personal jurisdiction over Chefman because Chefman is incorporated in and maintains its principal place of business in the State of New Jersey and this District. Further, Chefman conducts business in New Jersey and in this District, including, upon information and belief, designing, importing, selling, offering for sale, and shipping the products that infringe the Asserted SharkNinja Patents: Chefman's Electric Indoor Air Fryer + Grill and Chefman's Dual Air Fryer (collectively, the "Infringing Chefman Products"). Chefman further offers to place and/or places the Infringing Chefman Products into the stream of commerce in this District with the knowledge or understanding that the Infringing Chefman Products would be

used or sold in this District. As such, Chefman expects its actions to have consequences within this District. Chefman's infringing acts have caused injury to SharkNinja within this District.

15. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b)–(d) and 1400(b). As set forth above, Chefman is incorporated in this District and has its principal place of business in this District. Chefman therefore resides in the state of New Jersey. As also explained above, Chefman has committed and continues to commit acts of infringement in this District because Chefman offers to provide and/or provides the Infringing Chefman Products to customers in this District.

### **III. FACTUAL ALLEGATIONS**

#### **A. The Asserted SharkNinja Patents**

16. The home cooking appliance market has seen rapid growth in recent years. Home cooking systems can be more efficient, cost effective, and convenient—and the number of home cooking systems sold each year in America continues to increase.<sup>1</sup> SharkNinja saw this trend years ago and, before many others in the industry, began investing in new developments in home cooking systems to make home cooking more effective. SharkNinja's team of engineers developed dozens of inventions to make home cooking faster, more affordable, and more effective. The Asserted SharkNinja Patents came out of this development work.

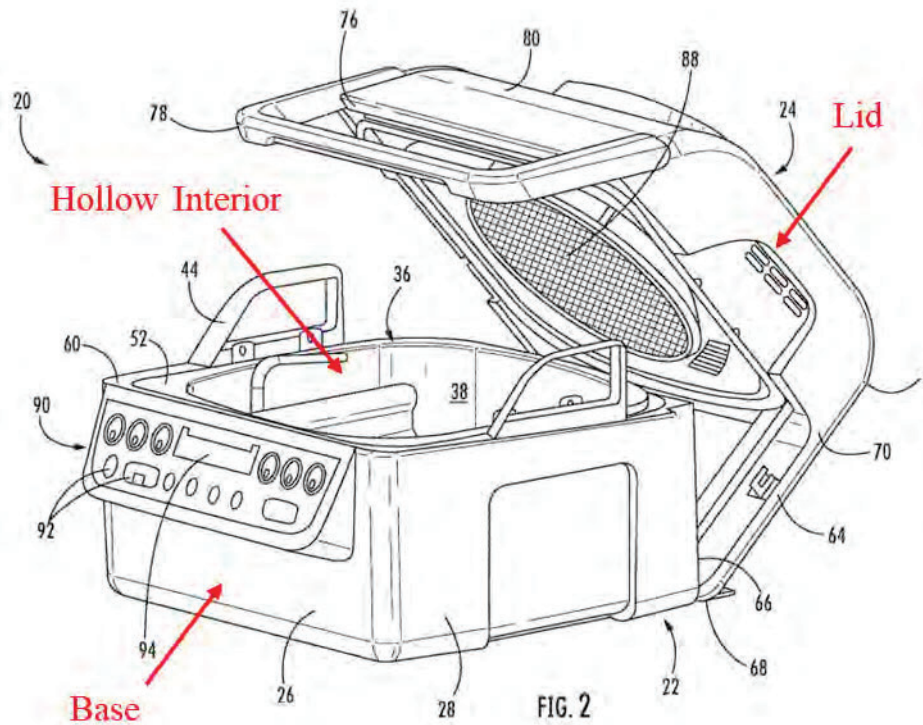
#### **The '146, '152, and '654 Patents**

17. The '146 patent (attached hereto as Exhibit A) and the '152 patent (attached hereto as Exhibit B) relate to an improved countertop air grilling system. *E.g.*, Ex. A at 1:13–15. The '654 patent (attached hereto as Exhibit C) relates to the ornamental design for a grill plate.

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<sup>1</sup> <https://www.fortunebusinessinsights.com/kitchen-appliances-market-104504>;  
<https://gembah.com/wp-content/uploads/2024/02/Market-Trends-Innovation-Report-Home-Kitchen.pdf>.

The '146 and '152 patents relate to an indoor air fryer and grill system that, among other features, includes a base and a lid and has a hollow interior (*id.*, 3:33–37), as shown in the example system below:

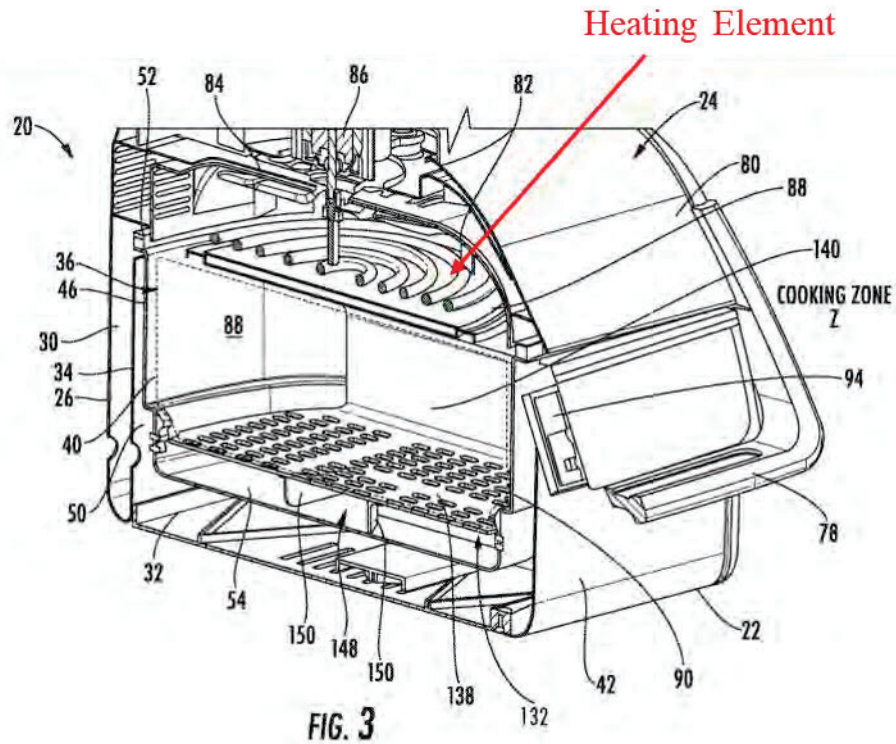


*Id.* at Figure 2 (annotations added).

18. A cooking container, which holds food to be cooked, is receivable inside the hollow interior. *Id.* 3:50–51.

19. In a conventional indoor grill, the system would then heat food from the bottom of the cooking container or from both the bottom of the grill and the lid of the grill. But the '146 and '152 patents do not describe a conventional indoor grill. Instead, the patents involve, among other inventions, novel functionality in which the heating element is above the cooking container and air is diffused using a unique grill plate.

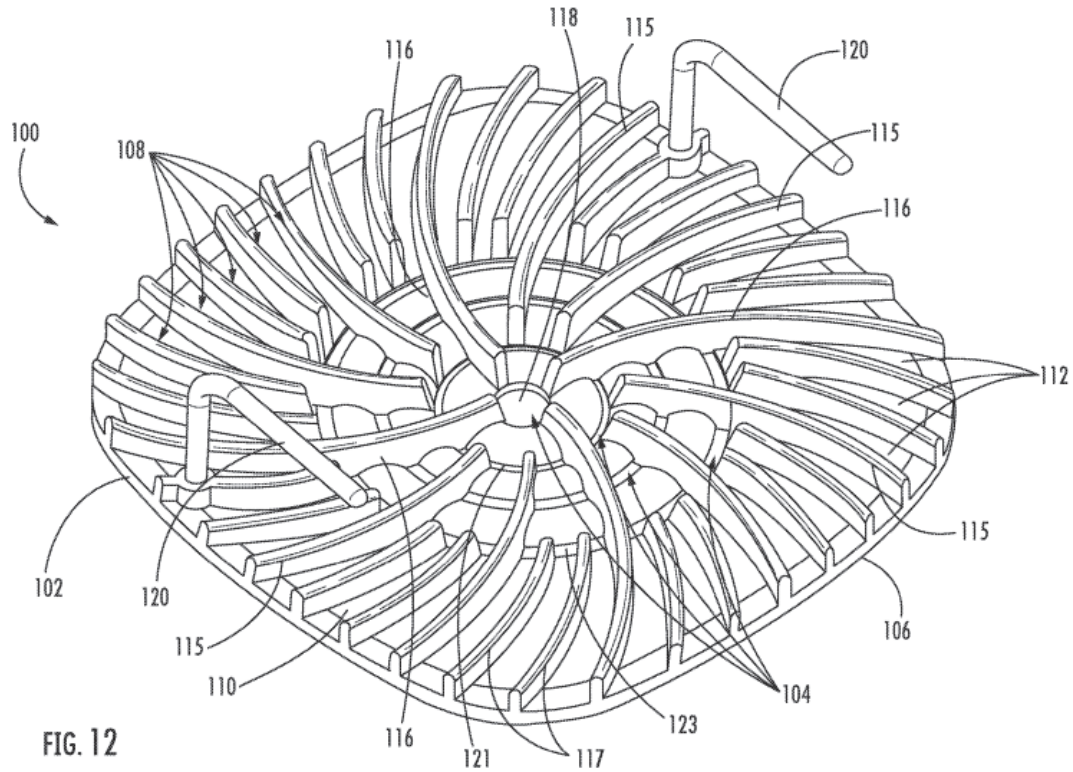
20. Figure 3 of the patents shows an example of a system in which the heating element is above the cooking container:



*Id.* Figure 3 (annotations added).

21. The patents state that an air movement device, such as a fan, can be above the cooking container. *E.g., id.* Fig.3, 6:64–7:1. Air is heated as it flows along its path of circulation, such as by flowing over a portion of the heating element. *Id.* 7:1–3. The heated air can then flow downwardly into the cooking volume along the interior surface of the cooking container. *Id.* 12:60–65. The air then can contact the grill plate. One example of the '146 and '152 grill plate is shown below:





*E.g., id.* Fig. 12.

22. The grill plate can contain ribs, labeled 108 in the example shown above. *Id.* 12:17–19. The ribs on the grill plate can create a diffusing structure that can diffuse air flow, such as the air flow from the heating element. *Id.* 12:17–22. The configuration of the ribs and channels between the ribs can direct the air flow towards the center of the grill plate. *Id.* 13:5–13. The flow of air that exits the channels can then flow upwardly from beneath a food item and around an exterior of the food item. *Id.* 13:18–26. Because the air can flow upwardly in this manner and heated air can flow downwardly into the cooking volume, the system heats not just the bottom of the food but the entire exterior of the food. *Id.* The other requirements of the claims of the '146 and '152 patents are described in more detail below.

23. SharkNinja's '146 and '152 patents improve the performance and effectiveness, and SharkNinja's '654 patent improves the ornamental appearance of indoor grills. Instead of simply heating food from below, or requiring one heating element above the food and another heating element below the food, the '146 and '152 patents provide heat that surrounds the food item. This allowed more even and uniform heating. Further, the use of the '146 and '152 inventions allows the grill plate to better diffuse heat—for example, the inventions can allow grill or sear marks on the food, which was typically not possible with indoor cooking systems. *E.g., id.* 14:14-15:5. The unconventional solution of the '146 and '152 patents thus provided significant improvements to the performance of indoor grills.

24. SharkNinja recognized the importance and market value of the '146, '152, and '654 patents and has used the inventions of these patents in its products. For example, SharkNinja has used various of the patents in its Ninja® Indoor Grill & Air Fryers, including the Ninja® Foodi® XL 6-in-1 Indoor Grill & Air Fryer (DG500 Series), Ninja® Foodi® 6-in-1 Indoor Grill & Air Fryer (EG200 Series), Ninja® Foodi® 5-in-1 Indoor Grill & Air Fryer (AG300 Series), Ninja® Foodi® 5-in-1 Indoor Grill & Air Fryer with Integrated Smart Probe (AG400 Series), Ninja® Foodi® XL 6-in-1 Indoor Grill & Air Fryer (BG500 Series), and Ninja® Foodi® 4-in-1 Indoor Grill & Air Fryer (FG500 Series).

25. SharkNinja markets the use of the inventions of the '146, '152, and '654 patents in its products. For example, as shown below, SharkNinja highlights the ornamental appearance of the grill plate, as well as that the use of the patented grill plate allows improve air flow and heating around the food item:<sup>2</sup>

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<sup>2</sup> <https://www.ninjakitchen.com/products/ninja-foodi-6-in-1-indoor-grill-4-quart-air-fryer-zidEG201>.



26. SharkNinja has marked various of its Ninja<sup>®</sup> Indoor Grill & Air Fryers with the '146, '152, and '654 patent numbers.<sup>3</sup>

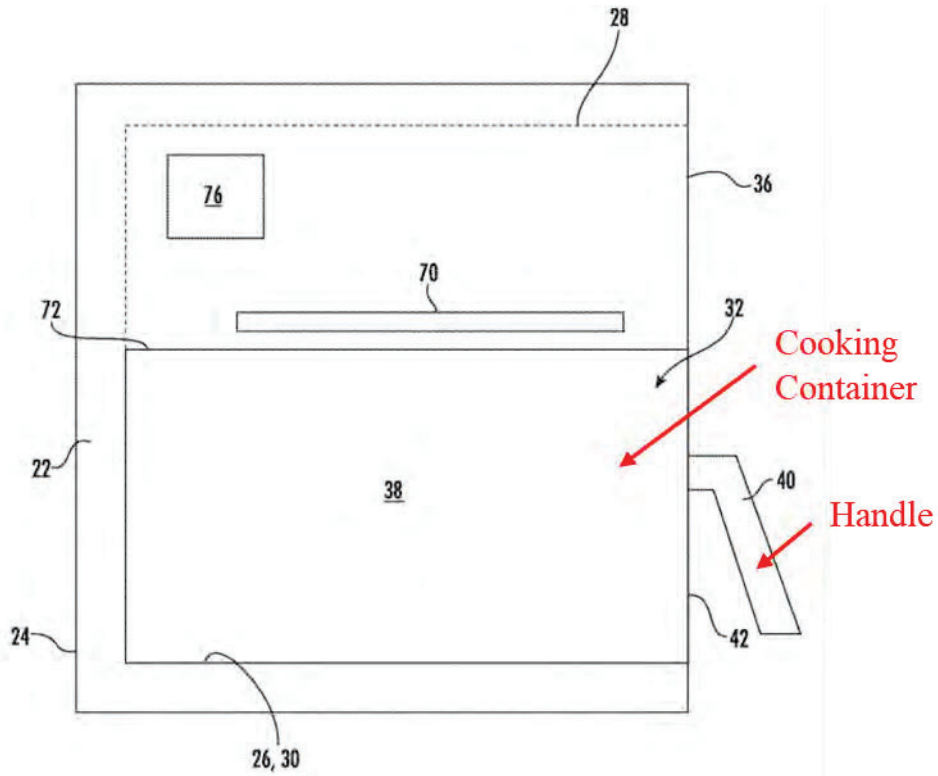
**The '026, '377, and '669 Patents**

27. The '026 patent (attached hereto as Exhibit D), '377 patent (attached hereto as Exhibit E), and '669 patent (attached hereto as Exhibit F) relate to a dual zone cooking system and its design. *E.g.*, Ex. D at Figs. 8, 13–15, 13:1–5; Ex. F at Figs. 1–7.

28. The patents describe an example cooking system that, among other requirements, has a housing, an internal compartment, a cooking container receivable within a portion of an internal compartment of the housing, and a handle associated within the cooking container to allow the cooking container to be grasped and manipulated relative to the housing. *E.g.*, Ex. D at 7:34–8:27. An example side view is shown below:

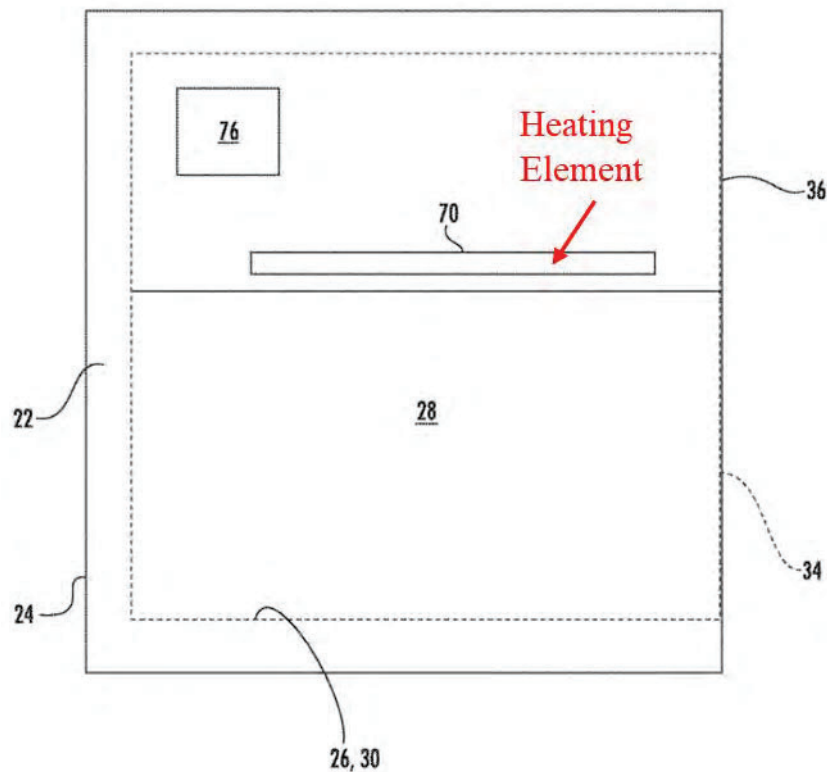
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<sup>3</sup> [https://www.sharkninja.com/wp-content/uploads/2024/02/Ninja-Patent-Marking-2-2-2024.pdf?\\_gl=1\\*15304ff\\*\\_ga\\*MTQ4NTg3OTYyMC4xNzI0OTI0NjMx\\*\\_ga\\_L3KTXLYN9K\\*MTcyNDkyNDYzMC4xLjEuMTcyNDkyNDYzNi4wLjAuMA](https://www.sharkninja.com/wp-content/uploads/2024/02/Ninja-Patent-Marking-2-2-2024.pdf?_gl=1*15304ff*_ga*MTQ4NTg3OTYyMC4xNzI0OTI0NjMx*_ga_L3KTXLYN9K*MTcyNDkyNDYzMC4xLjEuMTcyNDkyNDYzNi4wLjAuMA).



*Id.* Fig. 1 (annotations added).

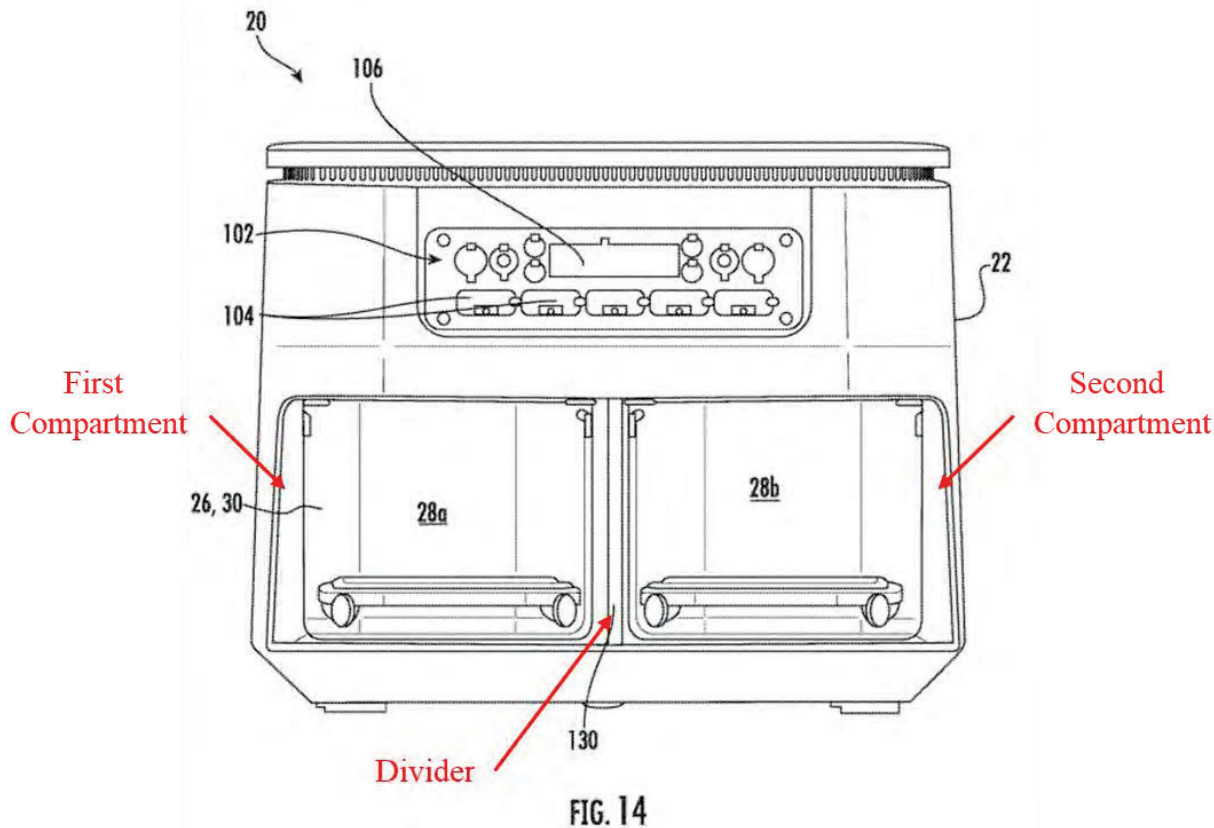
29. Like the '146 and '152 patents, the '026, '377, and '669 patents describe an example cooking system that can include a heating element at or above an upper extent or surface of the cooking container (*e.g.*, *id.* 9:24–27) as shown in the example below:



*Id.* Fig. 2 (annotations added)

30. An air movement mechanism, such as a fan, can circulate air through the cooking volume and the air is heated as it flows, such as by flowing over a portion of the heating element. *Id.* 9:51–58. The heated air can be directed downwardly into the cooking container. *Id.* 12:34–52.

31. But unlike a typical indoor cooking system, which has one cooking compartment and can cook food at one temperature at a time, the '026, '377, and '669 patents involve a system with two cooking zones—each of which can cook food at different temperatures. The patents depict a system with a housing that includes two compartments, each of which contains a cooking container. *E.g., id.* 12:65–13:5. An example of the two compartments, which can be separated by a divider, is shown below:



*Id.* Fig. 14 (annotations added).

32. Each internal compartment can include a heating element and air movement mechanism. *Id.* 13:25–32. As a result, the two compartments can be independently operable from one another. *Id.* 13:32–36. The system can heat food to one temperature in the first compartment and, at the same time, heat different food to a different temperature in the second compartment. The other requirements of the claims of the '026, '377, and '669 patent are described in more detail below.

33. The '026 and '377 patents claim a cooking system that uses the dual zone cooking invention. The '669 patent claims the design of the dual zone cooking invention:

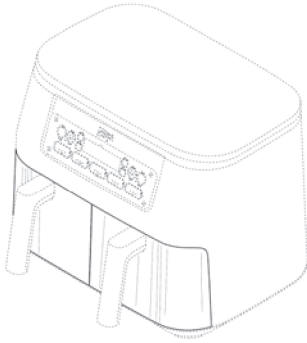


FIG. 1

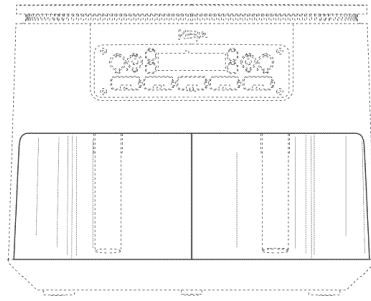


FIG. 2

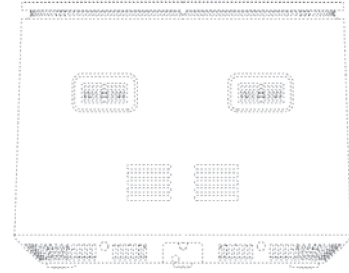


FIG. 3

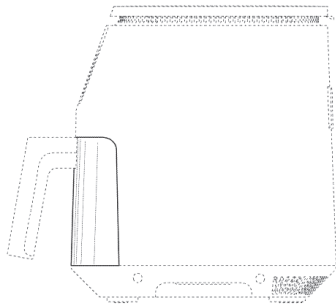


FIG. 4

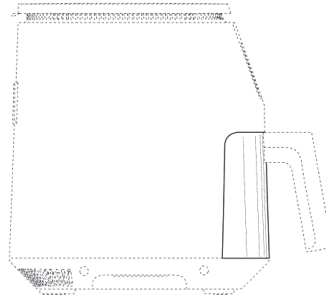


FIG. 5

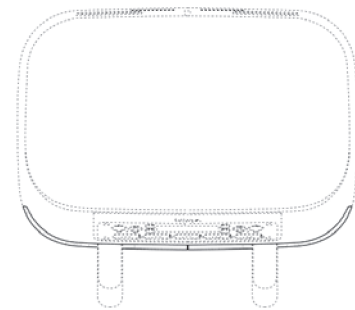


FIG. 6

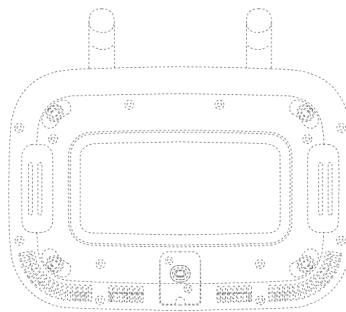


FIG. 7

34. SharkNinja's '026 and '377 patents improve the performance, and the '669 patent improves the ornamental appearance, of indoor cooking systems. Instead of simply heating food all together at one temperature, or having to cook food that requires different temperatures one at a time, the inventions of the '026 and '377 patents allow simultaneous cooking of different food at different temperatures. This made indoor cooking more efficient and effective.

35. SharkNinja recognized the importance and value of the '026, '377, and '669 patents and has used the inventions of these patents in its products. For example, SharkNinja has used various of the patents in its Ninja® Foodi® 2-Basket Air Fryer with DualZone™ Technology, including the 6-in-1 10-Qt DZ550 Series, the 6-in-1 8-Qt DZ201 Series, the 6-in-1 10-Qt DZ401 Series, the 4-in-1 8-Qt DZ100 Series, and the 5-in-1 6-Qt DZ090 Series.

36. SharkNinja markets the use of the inventions of the '026, '377, and '669 patents in these products. For example, as shown below, SharkNinja highlights the use of the patented dual cooking zones that allow simultaneous cooking at different temperatures:<sup>4</sup>



<sup>4</sup> <https://www.ninjakitchen.com/products/ninja-foodi-6-in-1-smart-10-qt.-2-basket-air-fryer-zidDZ550>.



37. SharkNinja has marked various of its Ninja<sup>®</sup> Foodi<sup>®</sup> 2-Basket Air Fryer with DualZone<sup>™</sup> Technology products with the '026, '377, and '669 patent numbers.<sup>5</sup>

**B. Chefman's Infringing Products**

38. As is evident from the Asserted SharkNinja Patents, and SharkNinja's 4,500 other patents, SharkNinja has a long history of independent development and innovation. Chefman, however, has taken a different path. Time and again, SharkNinja has developed a new product and released it to market only for Chefman to shortly thereafter release a copycat product. The Chefman Infringing Products are examples. SharkNinja released its Ninja<sup>®</sup> Indoor Grill & Air Fryers that use the grill plate inventions and designs of the '146, '152, and '654 patents in July 2019.<sup>6</sup>

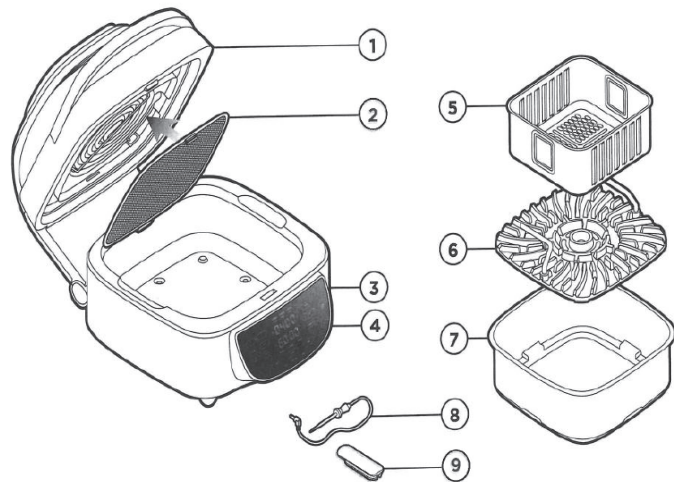
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<sup>5</sup> [https://www.sharkninja.com/wp-content/uploads/2024/02/Ninja-Patent-Marking-2-2-2024.pdf?\\_gl=1\\*15304ff\\*\\_ga\\*MTQ4NTg3OTYyMC4xNzI0OTI0NjMx\\*\\_ga\\_L3KTXLYN9K\\*MTcyNDkyNDYzMC4xLjEuMTcyNDkyNDYzNi4wLjAuMA](https://www.sharkninja.com/wp-content/uploads/2024/02/Ninja-Patent-Marking-2-2-2024.pdf?_gl=1*15304ff*_ga*MTQ4NTg3OTYyMC4xNzI0OTI0NjMx*_ga_L3KTXLYN9K*MTcyNDkyNDYzMC4xLjEuMTcyNDkyNDYzNi4wLjAuMA).

<sup>6</sup> <https://www.ninjakitchen.ca/products/ninja-foodi-5-in-1-indoor-grill-zidAG301C>;  
<https://www.prnewswire.com/news-releases/ninja-unveils-new-fall-kitchen-products-300894554.html>.



39. After these products were on the market, Chefman released its Electric Indoor Air Fryer + Grill with the same grill plate feature:<sup>7</sup>



<sup>7</sup> Chefman Electric Indoor Air Fryer + Grill User Guide (attached hereto as Exhibit G), at 8; <https://chefman.com/products/rj38-afg-7tp-v2?srsId=AfmBOorK4BkCXI0DvBI2sbegyYXREVRzz7LQFcMb52KjxI6JVMWWLum0>.

40. Similarly, SharkNinja released its Ninja® 2-Basket Air Fryer with DualZone™ Technology that uses the dual cooking zone invention of the '026, '377, and '669 patents in the summer of 2020:<sup>8</sup>



41. After these products were on the market, Chefman released its Dual Air Fryer with the same functionality:<sup>9</sup>

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<sup>8</sup> [https://www.ninjakitchen.com/products/ninja-foodi-6-in-1-8-qt.-2-basket-air-fryer-with-dualzone-technology-zidDZ201?srsId=AfmBOorWJQ4M0wRdzWQoRHsU1eXWASuPoS2pyI23r8bqH\\_42HmguROQ1](https://www.ninjakitchen.com/products/ninja-foodi-6-in-1-8-qt.-2-basket-air-fryer-with-dualzone-technology-zidDZ201?srsId=AfmBOorWJQ4M0wRdzWQoRHsU1eXWASuPoS2pyI23r8bqH_42HmguROQ1); <https://markrosenzweign.medium.com/shark-ninja-introduces-foodi-2-basket-air-fryer-4632fc39a4bd>.

<sup>9</sup> <https://chefman.com/products/rj38-sqpf-45tdb>;  
<http://web.archive.org/web/20230208131609/https://chefman.com/products/rj38-sqpf-45tdb>.



42. By making, using, selling, and offering for sale the Infringing Chefman Products, Chefman has infringed and continues to infringe the Asserted SharkNinja Patents and has benefited from doing so.

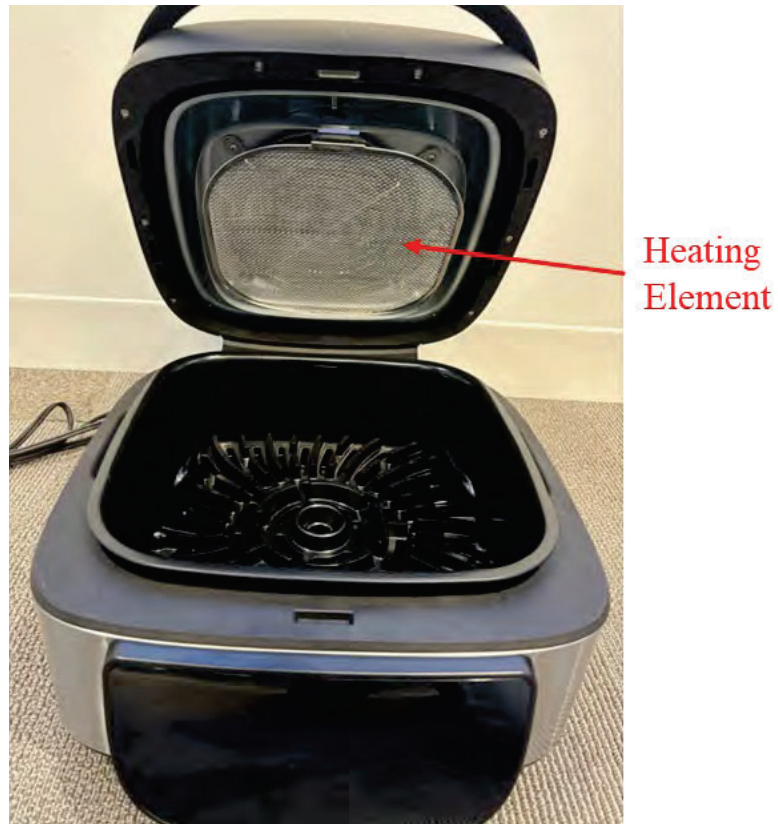
43. First, Chefman's Electric Indoor Air Fryer + Grill infringes the '146, '152, and '654 patents. Just as is described in the '146 and '152 patents, Chefman's Electric Indoor Air Fryer + Grill includes a base, a lid with a hollow interior, and a cooking container receivable inside the hollow interior:<sup>10</sup>

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<sup>10</sup> Ex. G at 12 (annotations added).



44. The heating element of the Chefman Electric Indoor Air Fryer + Grill is above the cooking container, just as shown in the '146 and '152 patents:



45. Also like the '146 and '152 patents, the Chefman Electric Indoor Air Fryer + Grill has a grill plate that contains ribs and diffuses air flow, and also embodies the ornamental design of the '654 patent:



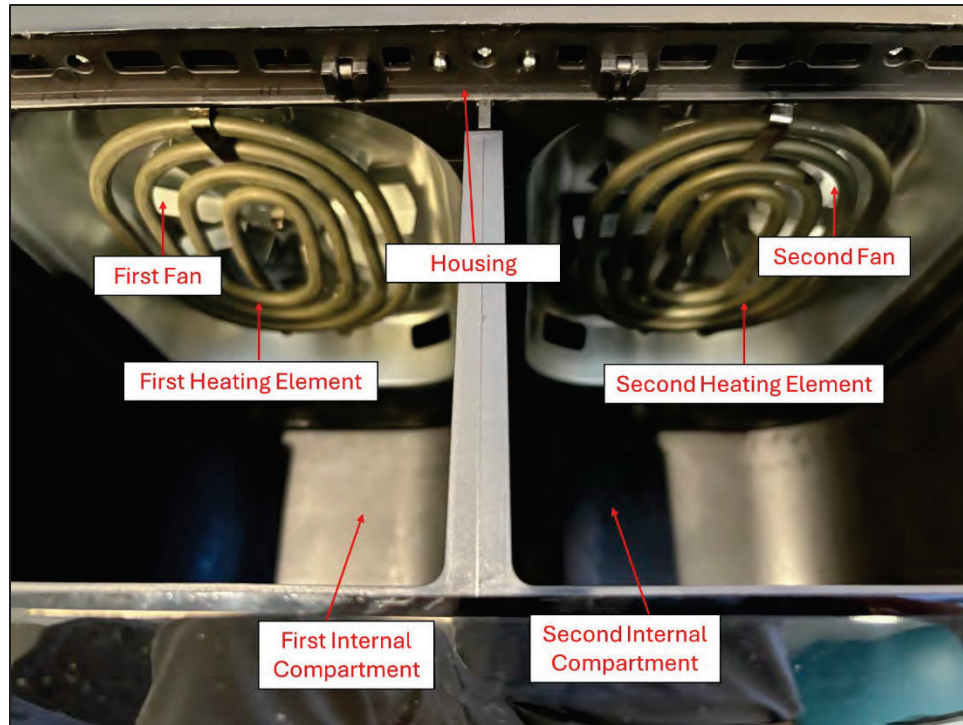
46. Just as described in the '146 and '152 patents, the configuration of the ribs and channels between the ribs of the grill plate of the Chefman Electric Indoor Air Fryer + Grill directs the air flow towards the center of the grill plate. The flow of air that exits the channels flows upwardly and heats the exterior of the food item. As described in more detail below, the Chefman Electric Indoor Air Fryer + Grill also meets the other requirements of the claims '146 and '152 patents. As explained in the '146 and '152 patents, Chefman's use of this technology allows more even and uniform heating.

47. Second, Chefman's Dual Air Fryer product infringes the '026, '377, and '669 patents. Just as is described in the '026 and '377 patents, the Chefman Dual Air Fryer has a housing that includes two compartments separated by a divider, each of which contains a cooking container:<sup>11</sup>



48. Each of the Chefman Dual Air Fryer compartments includes a heating element and air movement mechanism, just as is described in the '026 and '377 patents:

<sup>11</sup> <https://chefman.com/products/rj38-sqpf-45tdb>.



49. Also like the '026 and '377 patents, the Chefman Dual Air Fryer can heat food to one temperature in one compartment while simultaneously heating food at a different temperature in the second compartment:<sup>12</sup>

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<sup>12</sup> <https://chefman.com/products/rj38-sqpf-45tdb>.





Cook two foods at once with different time and temperature settings.

50. As described in more detail below, the Chefman Dual Air Fryer also meets the other requirements of the claims of the '026 and '377 patents, and embodies the ornamental design of the '669 patent. Chefman uses SharkNinja's technology and designs to obtain the benefits of the '026, '377, and '669 patents. Its Dual Air Fryer allows simultaneous cooking of different food at different temperatures to make indoor cooking more efficient and effective—the same benefits provided by the '026 and '377 patents.

#### **IV. COUNT I: INFRINGEMENT OF THE '146 PATENT**

51. SharkNinja incorporates by reference and realleges the allegations in paragraphs 1–50.

52. U.S. Patent No. 11,033,146 (Exhibit A), entitled “Cooking Device and Components Thereof,” was duly and properly issued by the United States Patent and Trademark Office (“USPTO”) on June 15, 2021.

53. SharkNinja owns all rights, title, and interest in the '146 patent.

54. The application for the '146 patent was filed on May 2, 2019 and claims priority to an application filed on February 25, 2019.

55. Chefman has infringed, and continues to infringe, one or more claims of the '146 patent, including at least claim 1, in violation of 35 U.S.C. § 271 by, among other things, making, using, offering to sell, and/or selling within the United States, supplying or causing to be supplied in or from the United States, and/or importing into the United States, without authority or license, the Chefman Electric Indoor Air Fryer + Grill.


56. The claim chart below details examples of Chefman's infringement, using the Chefman Electric Indoor Air Fryer + Grill, 5-in-1, Removable Integrated Probe Thermometer version of the Chefman Electric Indoor Air Fryer + Grill.

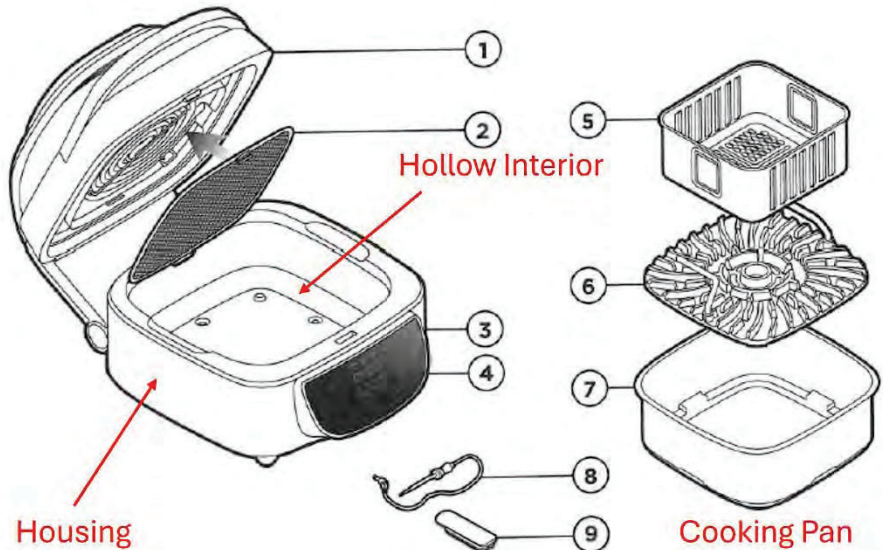
<b>U.S. Patent No. 11,033,146</b>	<b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b>
1[pre]  A cooking system, comprising:	The Chefman Indoor Air Fryer + Grill is a cooking system.  For example, the Chefman Indoor Air Fryer + Grill is a system that cooks foods using one of five cooking “functions,” including “Grill,” “Air Fry,” “Roast,” “Bake,” and “Broil:”  <ul style="list-style-type: none"> <li>• Ex. G at 11:</li> </ul>

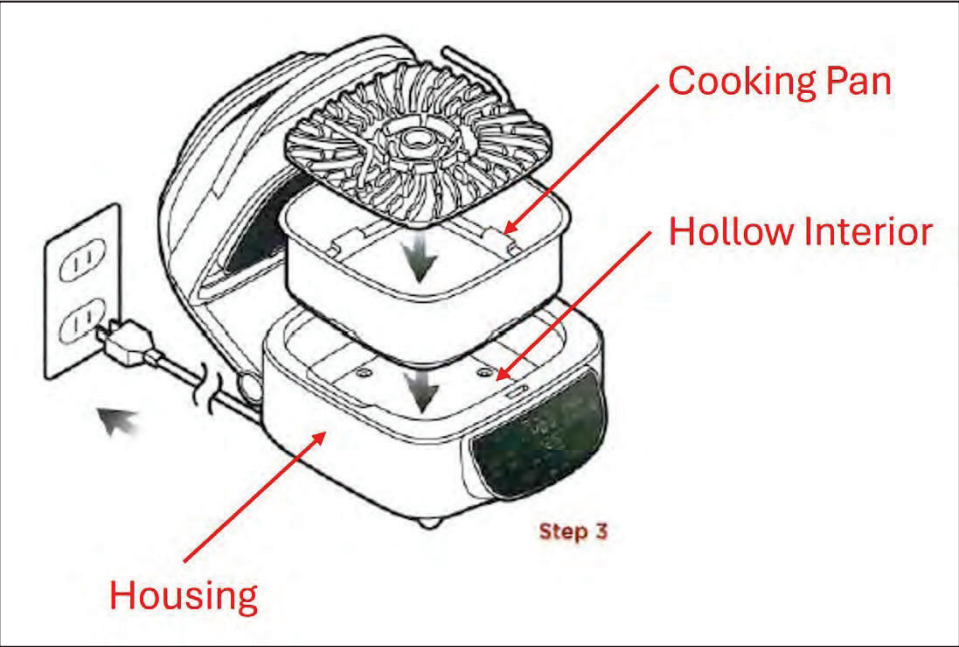
<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>																														
	<div style="border: 1px solid black; padding: 10px;"> <p><b>FEATURES</b></p> <p><b>COOKING FUNCTIONS AT A GLANCE</b></p> <p>All five functions require the cooking pan to be inserted and can all be used with the probe. They differ in their temperature range, inserts used, and whether they include a Flip/Stir notification. (Note that you can ignore or amend the notification as desired.)</p> <table border="1" data-bbox="506 588 1383 1108"> <thead> <tr> <th>Function</th> <th>Pan/Insert(s) Used</th> <th>Temperature Range (°F)</th> <th>Flip/Stir Notification?</th> <th>Can You Use with Probe?</th> </tr> </thead> <tbody> <tr> <td>Grill</td> <td>Cooking Pan + Grill Plate</td> <td>200-500</td> <td>Yes. Flip halfway through cooking time.</td> <td>Yes</td> </tr> <tr> <td>Air Fry</td> <td>Cooking Pan + Air Fry Basket</td> <td>200-450</td> <td>Yes. Stir halfway through cooking time or every 15 minutes for longer cycles.</td> <td>Yes</td> </tr> <tr> <td>Roast</td> <td>Cooking Pan</td> <td>200-450</td> <td>Yes. Stir halfway through cooking time.</td> <td>Yes</td> </tr> <tr> <td>Bake</td> <td>Cooking Pan (can add an 8-inch cake pan or loaf pan, not included)</td> <td>200-450</td> <td>No</td> <td>Yes</td> </tr> <tr> <td>Broil</td> <td>Cooking Pan</td> <td>Two settings: Low (450) and High (500)</td> <td>No</td> <td>Yes</td> </tr> </tbody> </table> <p>The Chefman Indoor Air Fryer + Grill cooking system includes different pans or inserts that can be used to cook food in the different cooking functions. For example, the “Grill Plate” is used when cooking food with the “Grill” function:</p> <ul style="list-style-type: none"> <li>• Ex. G at 11 (annotations added):</li> </ul> </div>	Function	Pan/Insert(s) Used	Temperature Range (°F)	Flip/Stir Notification?	Can You Use with Probe?	Grill	Cooking Pan + Grill Plate	200-500	Yes. Flip halfway through cooking time.	Yes	Air Fry	Cooking Pan + Air Fry Basket	200-450	Yes. Stir halfway through cooking time or every 15 minutes for longer cycles.	Yes	Roast	Cooking Pan	200-450	Yes. Stir halfway through cooking time.	Yes	Bake	Cooking Pan (can add an 8-inch cake pan or loaf pan, not included)	200-450	No	Yes	Broil	Cooking Pan	Two settings: Low (450) and High (500)	No	Yes
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<p><b>U.S. Patent No. 11,033,146</b></p>	<p align="center"><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>																														
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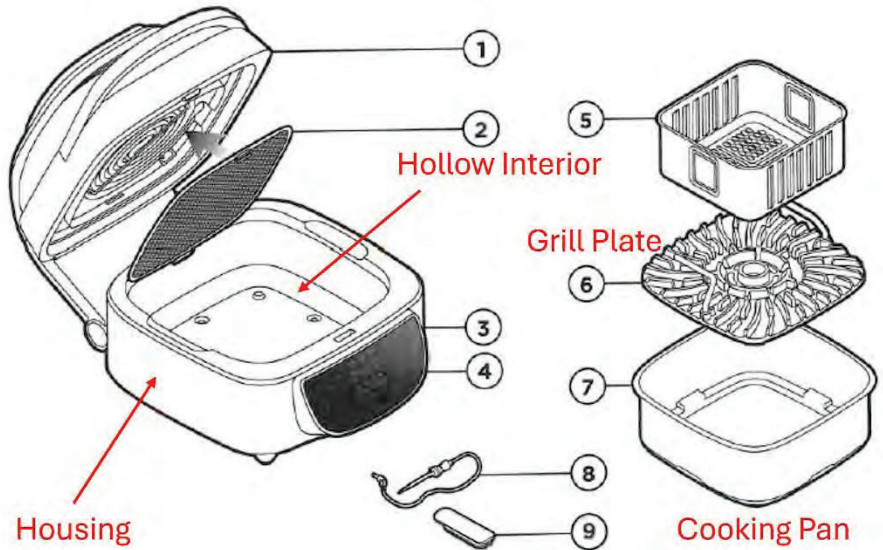
<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	<div style="border: 1px solid black; padding: 10px;"> <p style="text-align: center;"><b>OPERATING INSTRUCTIONS</b></p> <p><b>HOW TO GRILL</b></p> <p>The heavy-duty grill plate is excellent at absorbing and retaining heat, so it gives your food the same gorgeous grill marks you'd get on an outdoor grill, while the closed environment cooks it to juicy perfection. The directions below are for cooking without the probe; if you would rather grill to a specific internal temperature, see How to Cook Using the Probe Thermometer on p. 9.</p> <ol style="list-style-type: none"> <li>1. Set the unit on a hard, flat surface with at least 6 inches of clearance on the top and sides. Put the cooking pan in the unit and set the grill plate inside. Ensure the splatter shield is firmly in place and close the lid. Plug in the unit.</li> <li>2. Prepare your food as specified in your recipe.</li> <li>3. Press Grill on the control panel. The Grill button will illuminate in blue, and the default temperature of 450°F will appear on the panel, with the bar above Med lit up (medium grill temperature).</li> <li>4. Set the temperature and time. Press + or - on the Temp button to adjust the temperature from 200°F to 500°F in increments of 5°F (the bar may move to the High or Low setting). Press + or - on the Time button to adjust the time from 1 to 60 minutes (20 minutes max if grilling at 500°F) in increments of 1 minute.</li> <li>5. Press Start/Stop. This will begin the unit's automatic preheat.</li> <li>6. When the preheat is done, the unit will beep, and Add Food will display on the panel. Place food on the grill plate. <b>CAUTION:</b> The grill plate and grill plate handles will be hot.</li> <li>7. Close the lid. The timer will begin counting down.</li> <li>8. When the timer is halfway done, the unit will beep, and Flip will display on the panel. Flip foods as needed. Cooking will continue and the timer will resume counting down once the lid is closed.</li> <li>9. When time is up, the unit will beep, and End will display on the panel. Carefully remove the food. <b>CAUTION:</b> Grill plate handles are hot. Check food for doneness, and enjoy.</li> </ol> </div> <ul style="list-style-type: none"> <li>• An image of the Chefman Indoor Air Fryer + Grill cooking system with a grill plate is shown below:</li> </ul>

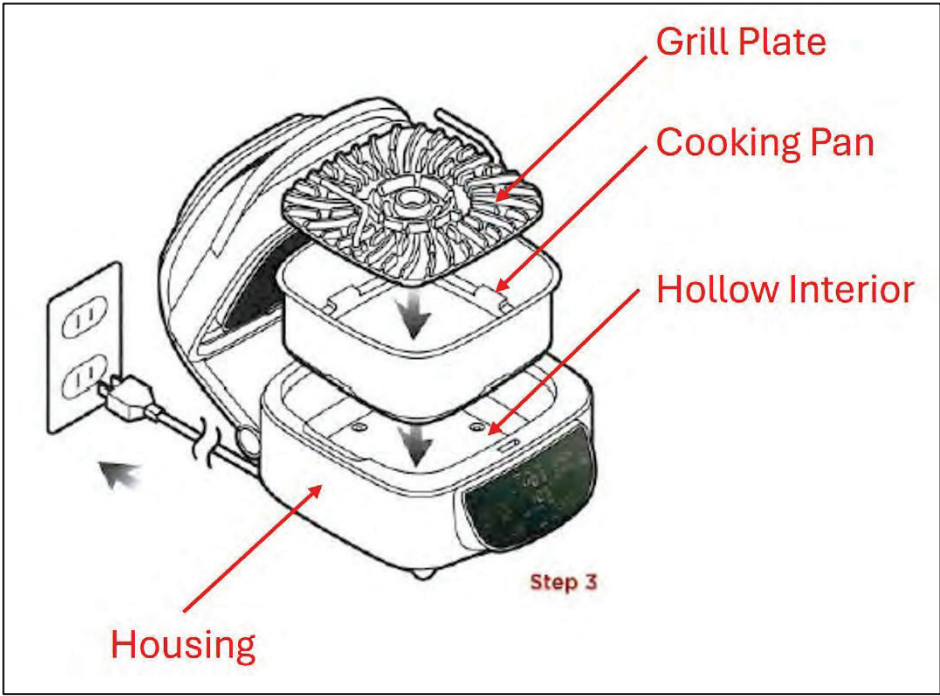
<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	
<p>1[a] a housing having a hollow interior, food being receivable within said hollow interior;</p>	<p>The Chefman Indoor Air Fryer + Grill cooking system includes a housing having a hollow interior, food being receivable within said hollow interior.</p> <p>First, the Chefman Indoor Air Fryer + Grill cooking system includes a housing having a hollow interior. A cooking pan or other inserts can be placed within the hollow interior.</p> <ul style="list-style-type: none"> <li>• Ex. G at 9 (annotations added):</li> </ul>

<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	<div style="border: 1px solid black; padding: 10px;"> <p><b>FEATURES</b></p>  <p><b>Housing</b></p> <p><b>Hollow Interior</b></p> <p><b>Cooking Pan</b></p> <ol style="list-style-type: none"> <li>1. <b>Lid:</b> contains heat source and fan</li> <li>2. <b>Removable Mesh Splatter Shield:</b> inserts into lid to help keep heating element clean and prevent smoking</li> <li>3. <b>Thermometer Jack:</b> powers probe</li> <li>4. <b>Control Panel:</b> capacitive touch LED screen</li> <li>5. <b>Nonstick Air Fryer Basket:</b> allows air to circulate around foods</li> <li>6. <b>Grill Plate:</b> heavy-duty die-cast aluminum for great grill marks</li> <li>7. <b>Nonstick Cooking Pan:</b> large capacity for family-size meals</li> <li>8. <b>Thermometer Probe:</b> tracks internal temperature of food during cooking</li> <li>9. <b>Probe Cord Winding Wheel:</b> holds cord when not in use (separate from unit)</li> </ol> </div> <ul style="list-style-type: none"> <li>• Ex. G at 14 (annotations added):</li> </ul>

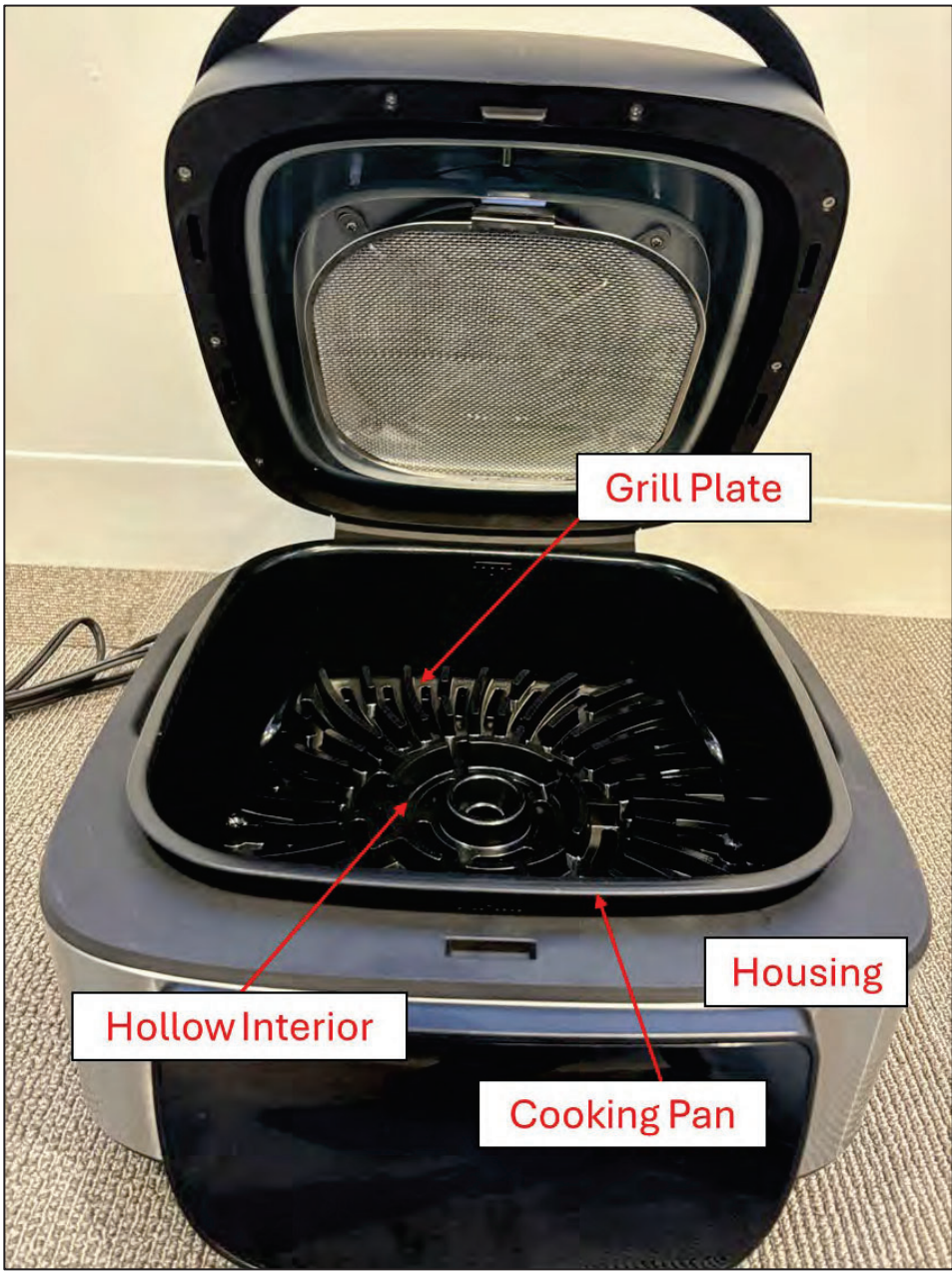
<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	 <p>The diagram shows a cross-section of an air fryer. The main body is labeled 'Housing'. Inside, there is a 'Hollow Interior' where a 'Cooking Pan' is placed. A power cord is shown plugged into a wall outlet. The text 'Step 3' is located at the bottom right of the diagram.</p> <p>Second, food is receivable within said hollow interior. For example, the cooking pan placed inside the hollow interior holds food or an additional component such as a grill plate. The food is placed in the cooking pan or on the grill plate for cooking.</p> <ul style="list-style-type: none"><li>• Ex. G at 9 (annotations added):</li></ul>





<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	<div style="border: 1px solid black; padding: 10px;"> <p><b>FEATURES</b></p>  <p><b>1. Lid:</b> contains heat source and fan</p> <p><b>2. Removable Mesh Splatter Shield:</b> inserts into lid to help keep heating element clean and prevent smoking</p> <p><b>3. Thermometer Jack:</b> powers probe</p> <p><b>4. Control Panel:</b> capacitive touch LED screen</p> <p><b>5. Nonstick Air Fryer Basket:</b> allows air to circulate around foods</p> <p><b>6. Grill Plate:</b> heavy-duty die-cast aluminum for great grill marks</p> <p><b>7. Nonstick Cooking Pan:</b> large capacity for family-size meals</p> <p><b>8. Thermometer Probe:</b> tracks internal temperature of food during cooking</p> <p><b>9. Probe Cord Winding Wheel:</b> holds cord when not in use (separate from unit)</p> </div> <ul style="list-style-type: none"> <li>• Ex. G at 14 (annotations added):</li> </ul>

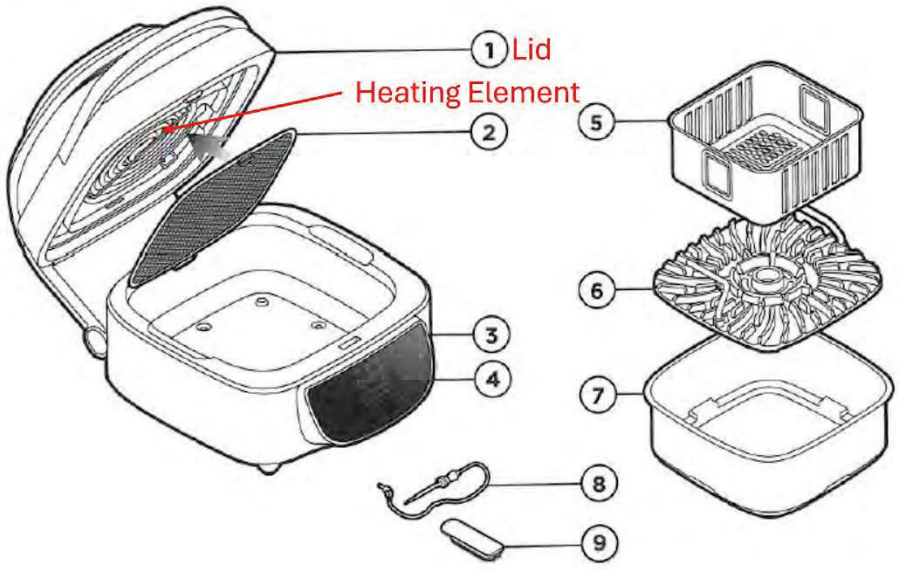
<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	 <p>The diagram shows a cross-section of an air fryer with its lid open. A power cord is plugged into a wall outlet on the left. The internal components are labeled with red arrows: 'Housing' points to the base, 'Hollow Interior' points to the space between the base and the lid, 'Cooking Pan' points to a rectangular pan inside, and 'Grill Plate' points to a circular grill plate on top of the pan. The text 'Step 3' is located at the bottom right of the diagram.</p> <ul style="list-style-type: none"><li>• Ex. G at 19 (annotations added):</li></ul>

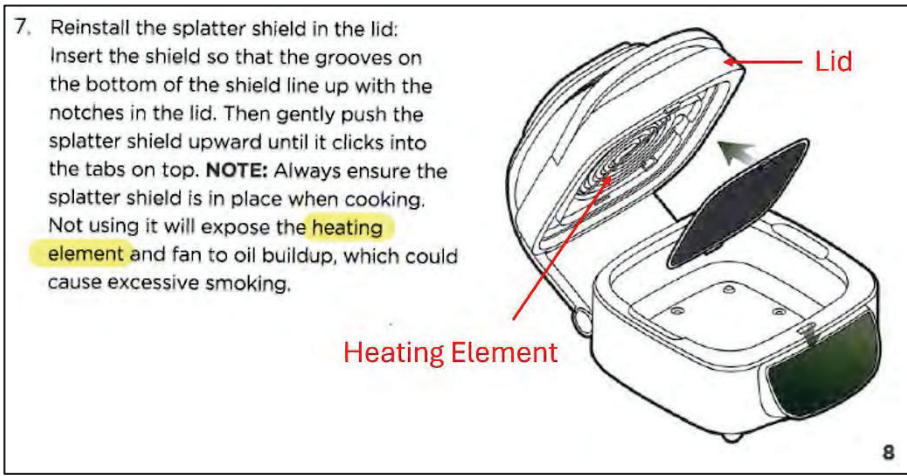
<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	<div style="border: 1px solid black; padding: 10px;"> <p style="text-align: center;"><b>OPERATING INSTRUCTIONS</b></p> <p><b>HOW TO GRILL</b></p> <p>The heavy-duty grill plate is excellent at absorbing and retaining heat, so it gives your food the same gorgeous grill marks you'd get on an outdoor grill, while the closed environment cooks it to juicy perfection. The directions below are for cooking without the probe; if you would rather grill to a specific internal temperature, see How to Cook Using the Probe Thermometer on p. 9.</p> <ol style="list-style-type: none"> <li>1. Set the unit on a hard, flat surface with at least 6 inches of clearance on the top and sides. Put the cooking pan in the unit and set the grill plate inside. Ensure the splatter shield is firmly in place and close the lid. Plug in the unit.</li> <li>2. Prepare your food as specified in your recipe.</li> <li>3. Press Grill on the control panel. The Grill button will illuminate in blue, and the default temperature of 450°F will appear on the panel, with the bar above Med lit up (medium grill temperature).</li> <li>4. Set the temperature and time. Press + or - on the Temp button to adjust the temperature from 200°F to 500°F in increments of 5°F (the bar may move to the High or Low setting). Press + or - on the Time button to adjust the time from 1 to 60 minutes (20 minutes max if grilling at 500°F) in increments of 1 minute.</li> <li>5. Press Start/Stop. This will begin the unit's automatic preheat.</li> <li>6. When the preheat is done, the unit will beep, and Add Food will display on the panel. Place food on the grill plate. <b>CAUTION:</b> The grill plate and grill plate handles will be hot.</li> <li>7. Close the lid. The timer will begin counting down.</li> <li>8. When the timer is halfway done, the unit will beep, and Flip will display on the panel. Flip foods as needed. Cooking will continue and the timer will resume counting down once the lid is closed.</li> <li>9. When time is up, the unit will beep, and End will display on the panel. Carefully remove the food. <b>CAUTION:</b> Grill plate handles are hot. Check food for doneness, and enjoy.</li> </ol> </div> <ul style="list-style-type: none"> <li>• As shown in the image below of the Chefman Indoor Air Fryer + Grill, when the grill plate and cooking pan are placed within the housing, food placed on the grill plate is within the hollow interior of the housing:</li> </ul>

<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	 <ul style="list-style-type: none"><li>• Chefman Indoor Air Fryer + Grill product website (Available at: <a href="https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ">https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ</a>):</li></ul>

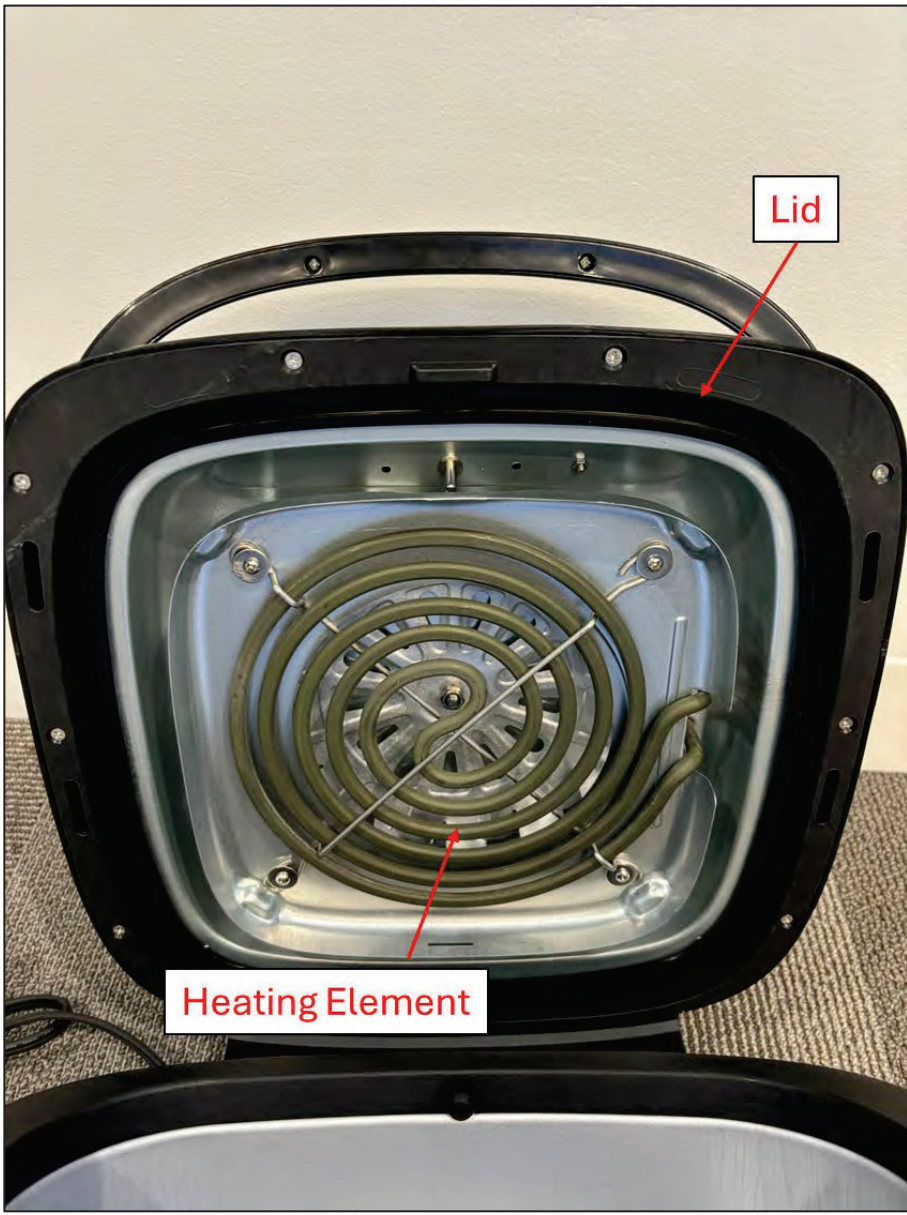
<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	 <p><b>AN AUTHENTIC GRILLING EXPERIENCE</b> Heavy-duty die-cast aluminum grill grate creates gorgeous grill marks and adds that authentic grilled flavor</p> <ul style="list-style-type: none"><li>• Chefman Indoor Air Fryer + Grill product website (Available at: <a href="https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ">https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ</a>):</li></ul>

<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	
<p>1[b] a heating element associated with said housing; and</p>	<p>The Chefman Indoor Air Fryer + Grill cooking system includes a heating element associated with said housing.</p> <p>The '152 patent explains that a heating element is associated with the housing at least when the heating element is mounted within the lid of the housing. <i>See, e.g.</i>, '152 patent, Fig. 3, 6:54–55 (“the at least one heating element 82 is mounted within the lid 24”). The Chefman Indoor Air Fryer + Grill cooking system includes the same feature: an electric heating element is mounted to the lid of the housing.</p> <ul style="list-style-type: none"> <li>• Ex. G at 9 (annotations added):</li> </ul>

<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	<div data-bbox="446 357 1393 1302"> <p><b>FEATURES</b></p>  <ol style="list-style-type: none"> <li>1. <b>Lid:</b> contains heat source and fan</li> <li>2. <b>Removable Mesh Splatter Shield:</b> inserts into lid to help keep heating element clean and prevent smoking</li> <li>3. <b>Thermometer Jack:</b> powers probe</li> <li>4. <b>Control Panel:</b> capacitive touch LED screen</li> <li>5. <b>Nonstick Air Fryer Basket:</b> allows air to circulate around foods</li> <li>6. <b>Grill Plate:</b> heavy-duty die-cast aluminum for great grill marks</li> <li>7. <b>Nonstick Cooking Pan:</b> large capacity for family-size meals</li> <li>8. <b>Thermometer Probe:</b> tracks internal temperature of food during cooking</li> <li>9. <b>Probe Cord Winding Wheel:</b> holds cord when not in use (separate from unit)</li> </ol> </div> <p>• Ex. G at 12 (annotations added):</p>

<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	<p>7. Reinstall the splatter shield in the lid: Insert the shield so that the grooves on the bottom of the shield line up with the notches in the lid. Then gently push the splatter shield upward until it clicks into the tabs on top. <b>NOTE:</b> Always ensure the splatter shield is in place when cooking. Not using it will expose the heating element and fan to oil buildup, which could cause excessive smoking.</p>  <p>The diagram shows a top-down view of the lid of a Chefman Indoor Air Fryer + Grill. The lid is hinged and is shown in an open position. A splatter shield is mounted on the inner surface of the lid. A red arrow points to the splatter shield with the label "Heating Element". Another red arrow points to the lid with the label "Lid". The number "8" is in the bottom right corner of the diagram.</p> <ul style="list-style-type: none"><li>• The image below of the Chefman Indoor Air Fryer + Grill shows the heating element mounted to the lid of the housing:</li></ul>



<p>U.S. Patent No. 11,033,146</p>	<p>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</p>
	 <p>The image shows the interior of a black air fryer with its lid open. A green, spiral-shaped heating element is mounted on a silver-colored support body. A red arrow points from a white box labeled "Lid" to the top edge of the fryer's lid. Another red arrow points from a white box labeled "Heating Element" to the spiral element. The fryer is placed on a light-colored carpet.</p>
<p>1[c] a support body for supporting food within said hollow interior,</p>	<p>The Chefman Indoor Air Fryer + Grill cooking system includes a support body for supporting food within said hollow interior, said support body including a support surface, wherein said support surface includes a plurality of ribs.</p>

<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
<p>said support body including a support surface, wherein said support surface includes a plurality of ribs;</p>	<p>First, the Chefman Indoor Air Fryer + Grill cooking system includes a support body for supporting food within said hollow interior. Specifically, the Chefman Indoor Air Fryer + Grill cooking system includes a grill plate that is a support body and supports food within the hollow interior.</p> <ul style="list-style-type: none"> <li>• Ex. G at 19 (annotations added):</li> </ul> <div data-bbox="448 611 1398 1570" style="border: 1px solid black; padding: 10px;"> <p><b>OPERATING INSTRUCTIONS</b></p> <p><b>HOW TO GRILL</b></p> <p>The heavy-duty grill plate is excellent at absorbing and retaining heat, so it gives your food the same gorgeous grill marks you'd get on an outdoor grill, while the closed environment cooks it to juicy perfection. The directions below are for cooking without the probe; if you would rather grill to a specific internal temperature, see How to Cook Using the Probe Thermometer on p. 9.</p> <ol style="list-style-type: none"> <li>1. Set the unit on a hard, flat surface with at least 6 inches of clearance on the top and sides. Put the cooking pan in the unit and set the grill plate inside. Ensure the splatter shield is firmly in place and close the lid. Plug in the unit.</li> <li>2. Prepare your food as specified in your recipe.</li> <li>3. Press Grill on the control panel. The Grill button will illuminate in blue, and the default temperature of 450°F will appear on the panel, with the bar above Med lit up (medium grill temperature).</li> <li>4. Set the temperature and time. Press + or - on the Temp button to adjust the temperature from 200°F to 500°F in increments of 5°F (the bar may move to the High or Low setting). Press + or - on the Time button to adjust the time from 1 to 60 minutes (20 minutes max if grilling at 500°F) in increments of 1 minute.</li> <li>5. Press Start/Stop. This will begin the unit's automatic preheat.</li> <li>6. When the preheat is done, the unit will beep, and Add Food will display on the panel. Place food on the grill plate. <b>CAUTION: The grill plate and grill plate handles will be hot.</b></li> <li>7. Close the lid. The timer will begin counting down.</li> <li>8. When the timer is halfway done, the unit will beep, and Flip will display on the panel. Flip foods as needed. Cooking will continue and the timer will resume counting down once the lid is closed.</li> <li>9. When time is up, the unit will beep, and End will display on the panel. Carefully remove the food. <b>CAUTION: Grill plate handles are hot. Check food for doneness, and enjoy.</b></li> </ol> </div> <ul style="list-style-type: none"> <li>• Chefman Indoor Air Fryer + Grill product website (Available at: <a href="https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ">https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ</a>):</li> </ul>

U.S. Patent No.  
11,033,146

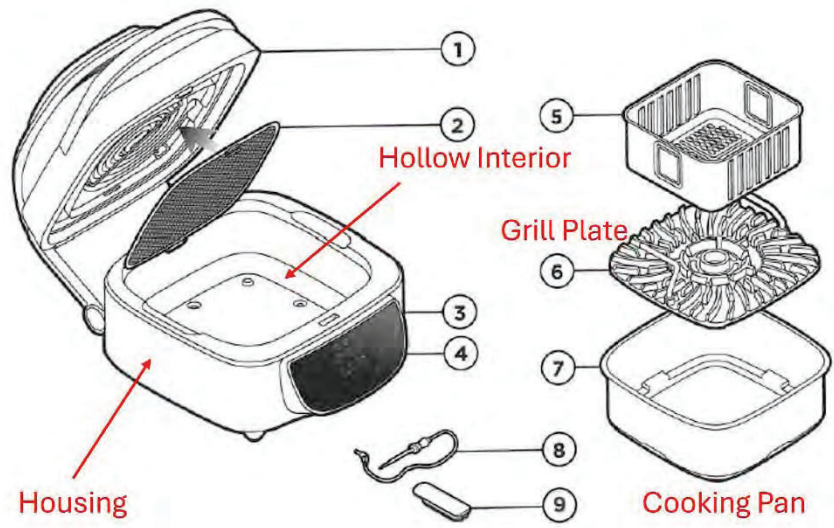
**Evidence of Infringement: Chefman Indoor Air Fryer + Grill**

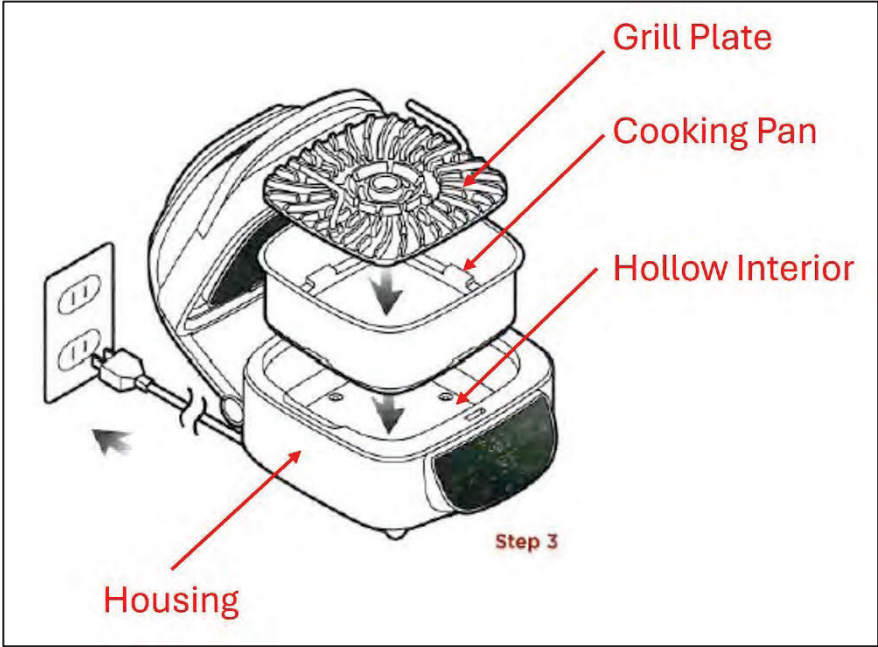


**AN AUTHENTIC GRILLING EXPERIENCE**  
Heavy-duty die-cast aluminum grill grate creates  
gorgeous grill marks and adds that authentic grilled flavor

- Chefman Indoor Air Fryer + Grill product website (Available at: <https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ>):

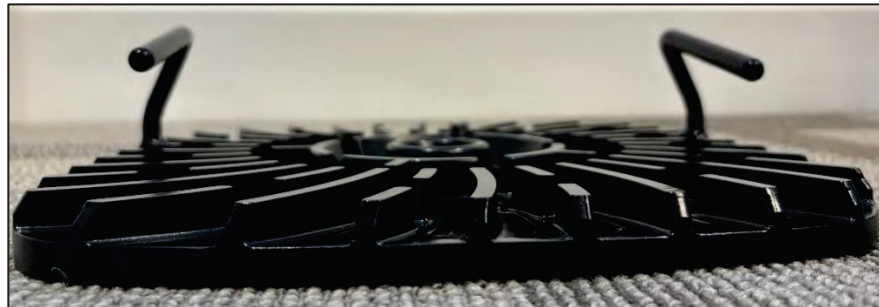
<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	 <ul style="list-style-type: none"><li>• Ex. G at 9 (annotations added):</li></ul>

<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	<div style="border: 1px solid black; padding: 10px;"> <p style="text-align: center;"><b>FEATURES</b></p>  <p><b>1. Lid:</b> contains heat source and fan</p> <p><b>2. Removable Mesh Splatter Shield:</b> inserts into lid to help keep heating element clean and prevent smoking</p> <p><b>3. Thermometer Jack:</b> powers probe</p> <p><b>4. Control Panel:</b> capacitive touch LED screen</p> <p><b>5. Nonstick Air Fryer Basket:</b> allows air to circulate around foods</p> <p><b>6. Grill Plate:</b> heavy-duty die-cast aluminum for great grill marks</p> <p><b>7. Nonstick Cooking Pan:</b> large capacity for family-size meals</p> <p><b>8. Thermometer Probe:</b> tracks internal temperature of food during cooking</p> <p><b>9. Probe Cord Winding Wheel:</b> holds cord when not in use (separate from unit)</p> </div> <ul style="list-style-type: none"> <li>• Ex. G at 14 (annotations added:</li> </ul>

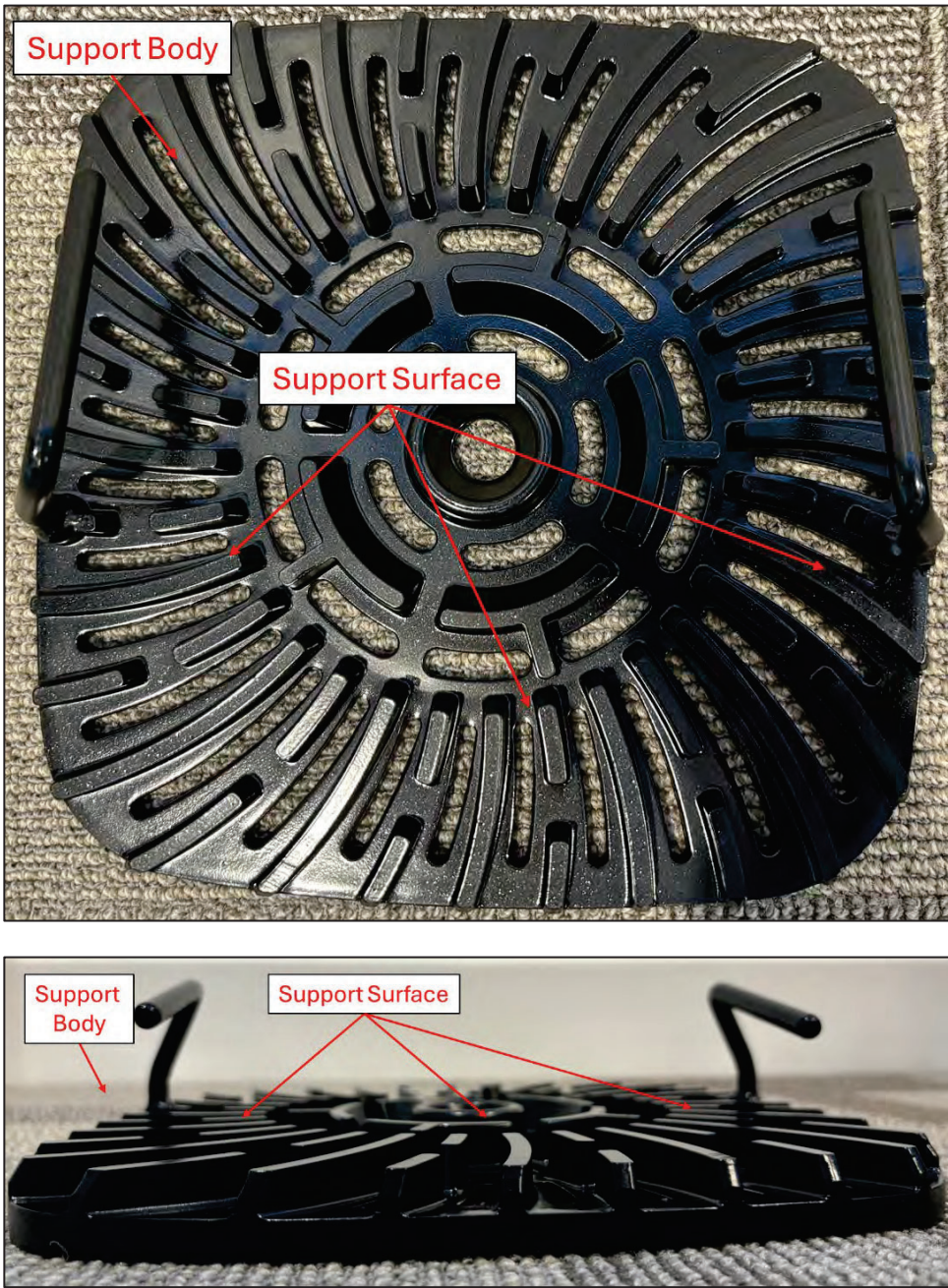
<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	 <p>The diagram shows a side view of the Chefman Indoor Air Fryer + Grill with its lid open. A power cord is plugged into a wall outlet on the left. The device is labeled 'Step 3' at the bottom right. Red arrows point to the following components: 'Housing' (the main body), 'Hollow Interior' (the inner chamber), 'Cooking Pan' (the inner basket), and 'Grill Plate' (the top grate). The grill plate is shown with a top view and a side view, indicating its structure.</p> <ul style="list-style-type: none"><li>• The top and side views of the grill plate (i.e., support body) are shown in the images below of the Chefman Indoor Air Fryer + Grill:</li></ul>

U.S. Patent No.  
11,033,146


Evidence of Infringement: Chefman Indoor Air Fryer + Grill



Second, the support body of the Chefman Indoor Air Fryer + Grill cooking system (grill plate) includes a support body including a support surface, as shown in the image below of the grill plate of the Chefman Indoor Air Fryer + Grill:

<p>U.S. Patent No. 11,033,146</p>	<p>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</p>
	 <p>The top photograph shows a top-down view of a circular black grill plate with a complex, lattice-like structure. Red arrows point from a callout box labeled 'Support Body' to the outer rim and from a callout box labeled 'Support Surface' to the central and inner sections of the plate. The bottom photograph shows a side view of the grill plate, highlighting the raised edges and the flat top surface. Red arrows point from a callout box labeled 'Support Body' to the side of the plate and from a callout box labeled 'Support Surface' to the top surface.</p> <p>As shown below, the top of the grill plate is a support surface that holds food:</p> <ul style="list-style-type: none"><li>• Chefman Indoor Air Fryer + Grill product website (Available at: <a href="https://chefman.com/products/rj38-afg-7tp-">https://chefman.com/products/rj38-afg-7tp-</a></li></ul>




<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	<p>v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ):</p> <div data-bbox="495 464 1390 1358"><p><b>AN AUTHENTIC GRILLING EXPERIENCE</b> Heavy-duty die-cast aluminum grill grate creates gorgeous grill marks and adds that authentic grilled flavor</p></div> <ul style="list-style-type: none"><li>• Chefman Indoor Air Fryer + Grill product website (Available at: <a href="https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ">https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ</a>):</li></ul>

**U.S. Patent No.  
11,033,146**

**Evidence of Infringement: Chefman Indoor Air Fryer + Grill**

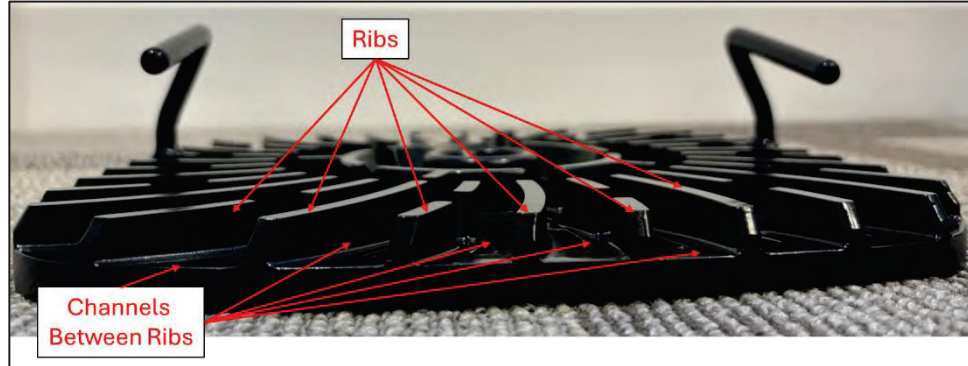


Third, the support surface of the Chefman Indoor Air Fryer + Grill cooking system (grill plate) includes a plurality of ribs. The ribs of the grill plate are shown below:

<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	
<p>1[d] wherein said support surface includes a plurality of channels between said plurality of ribs,</p>	<p>In the Chefman Indoor Air Fryer + Grill cooking system, said support surface includes a plurality of channels between said plurality of ribs.</p> <p>As shown in the image below of the Chefman Indoor Air Fryer + Grill, the plurality of ribs on the grill plate form a plurality of channels between said plurality of ribs:</p>

U.S. Patent No.  
11,033,146

Evidence of Infringement: Chefman Indoor Air Fryer + Grill



U.S. Patent No. 11,033,146	Evidence of Infringement: Chefman Indoor Air Fryer + Grill
<p>1[e]</p> <p>wherein said plurality of ribs includes diffuser ribs, said plurality of diffuser ribs including short ribs, intermediate ribs, and long ribs, and</p>	<p>In the Chefman Indoor Air Fryer + Grill cooking system, said plurality of ribs includes diffuser ribs, said plurality of diffuser ribs including short ribs, intermediate ribs, and long ribs.</p> <p>First, the Chefman Indoor Air Fryer + Grill cooking system includes diffuser ribs. The grill plate of the Chefman Indoor Air Fryer + Grill leaves grill marks on the underside of food and heats up to 500°F. This shows that the ribs diffuse hot air along the plate to heat up the ribs:</p> <ul style="list-style-type: none"> <li>○ Chefman Indoor Air Fryer + Grill product website (Available at: <a href="https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ">https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ</a>) (“BRING THE BBQ INSIDE!: Virtually smokeless indoor grill features <b>heavy-duty aluminum grill plate for great grill marks</b>. Heats up to 500°F with one-touch presets for perfectly cooked chicken, meat, and fish and a flip indicator so you can multitask while your food cooks.”) (emphasis added).</li> <li>○ Ex. G at 9 (“Grill Plate: heavy-duty die-cast aluminum for great grill marks”).</li> <li>○ The diffuser ribs of the Chefman Indoor Air Fryer + Grill are shown in the image below of the Chefman Indoor Air Fryer + Grill:</li> </ul>

U.S. Patent No.  
11,033,146

Evidence of Infringement: Chefman Indoor Air Fryer + Grill

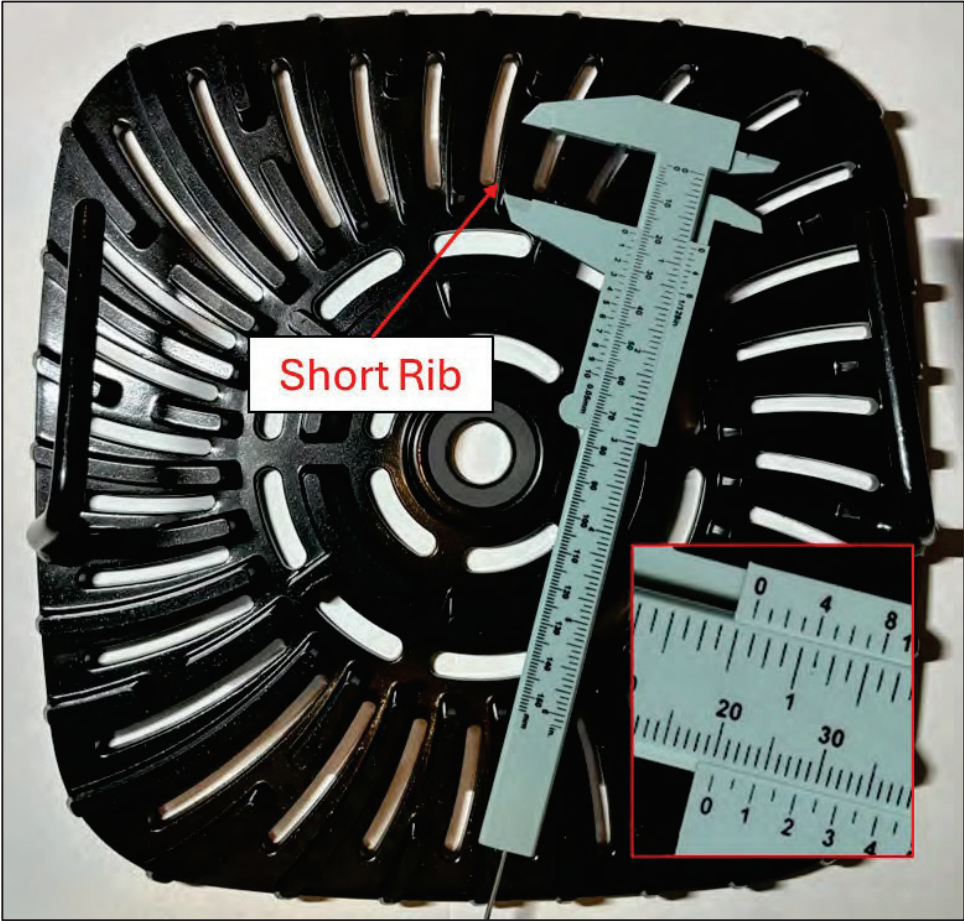


Second, the plurality of diffuser ribs include short ribs, intermediate ribs, and long ribs. The short ribs have a length of 20mm, as shown in the image below of Chefman Indoor Air Fryer + Grill:

U.S. Patent No.  
11,033,146

Evidence of Infringement: Chefman Indoor Air Fryer + Grill



<p>U.S. Patent No. 11,033,146</p>	<p>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</p>
	 <p>The intermediate ribs have length of approximately 30mm as shown in the image below of the Chefman Indoor Air Fryer + Grill:</p>



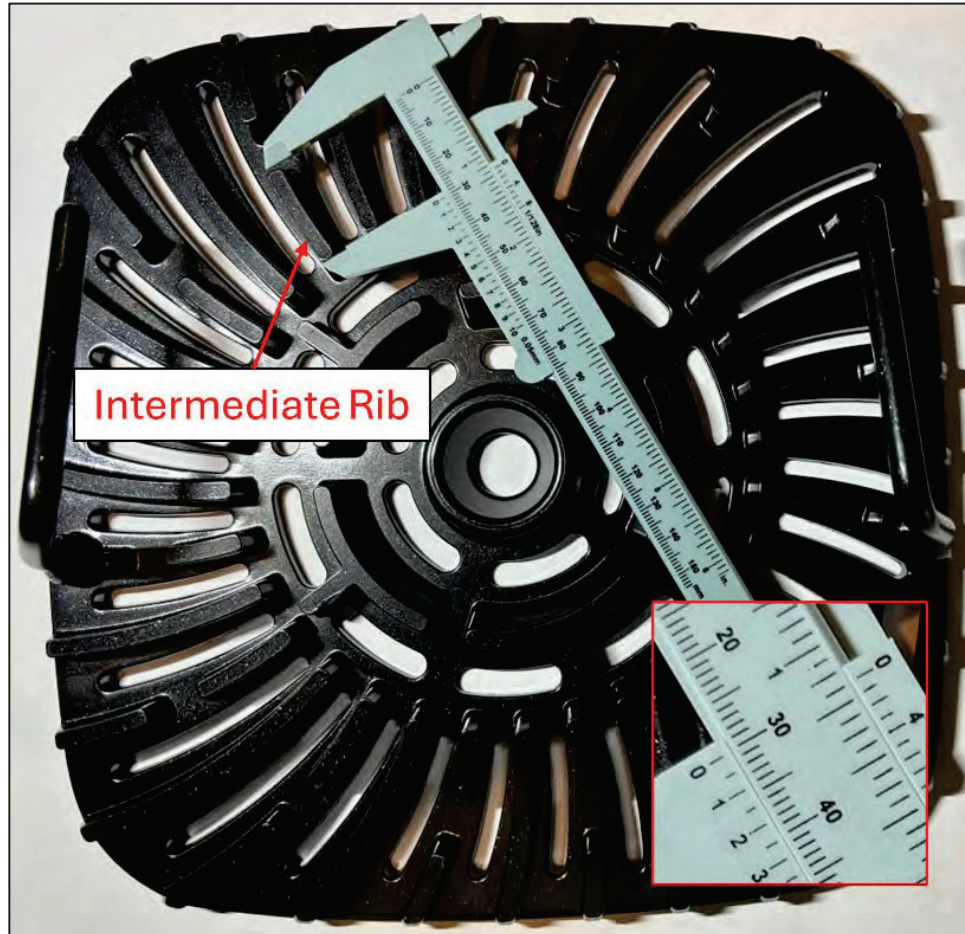
U.S. Patent No.  
11,033,146

Evidence of Infringement: Chefman Indoor Air Fryer + Grill

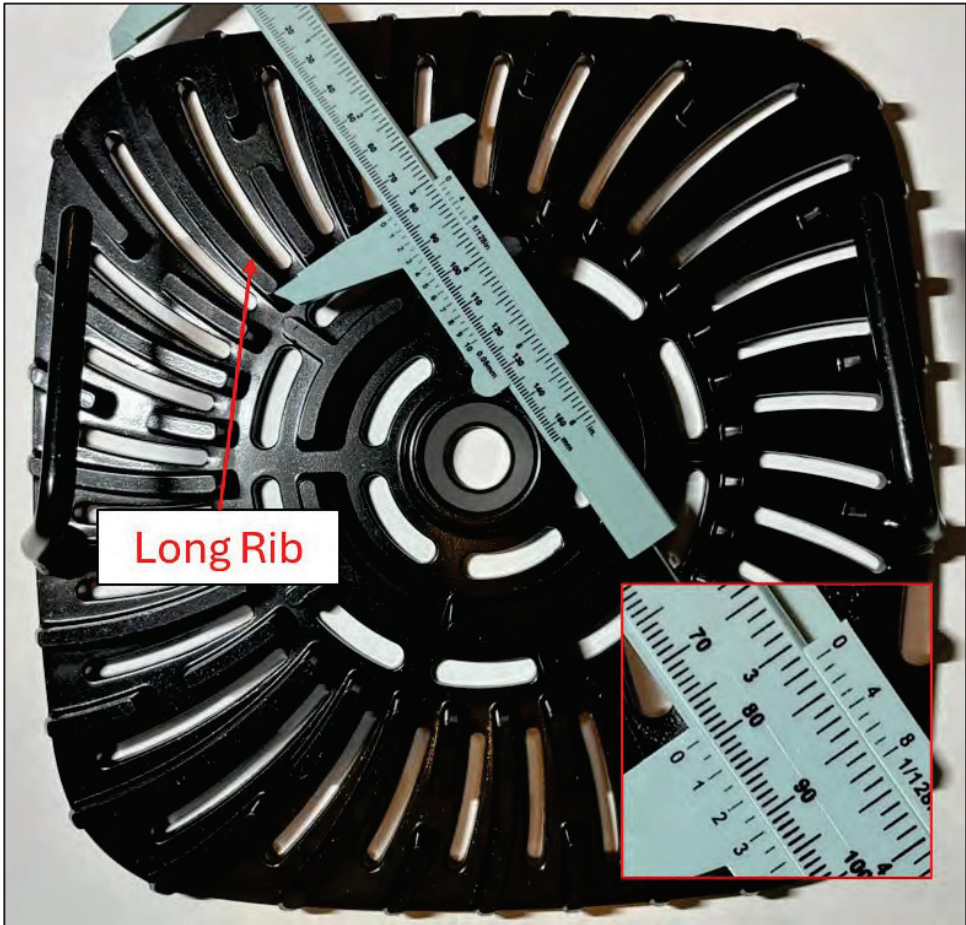



U.S. Patent No.  
11,033,146

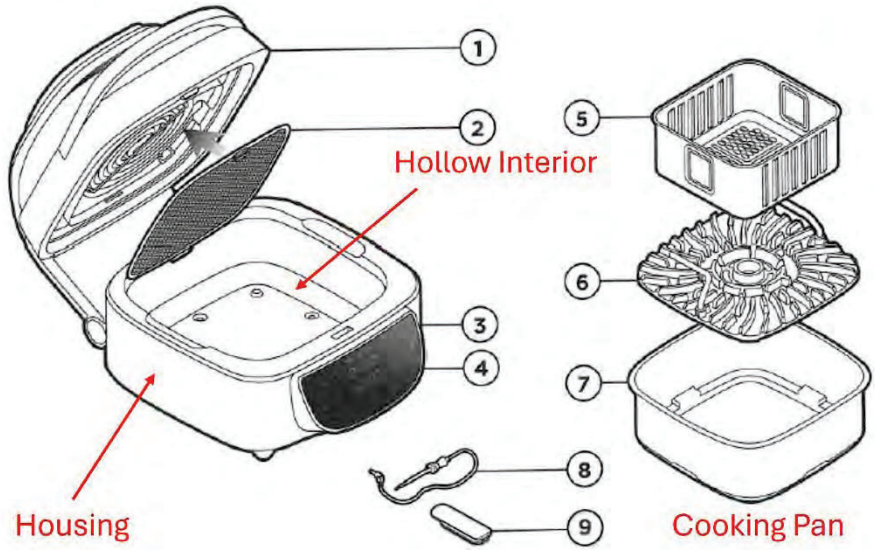
Evidence of Infringement: Chefman Indoor Air Fryer + Grill

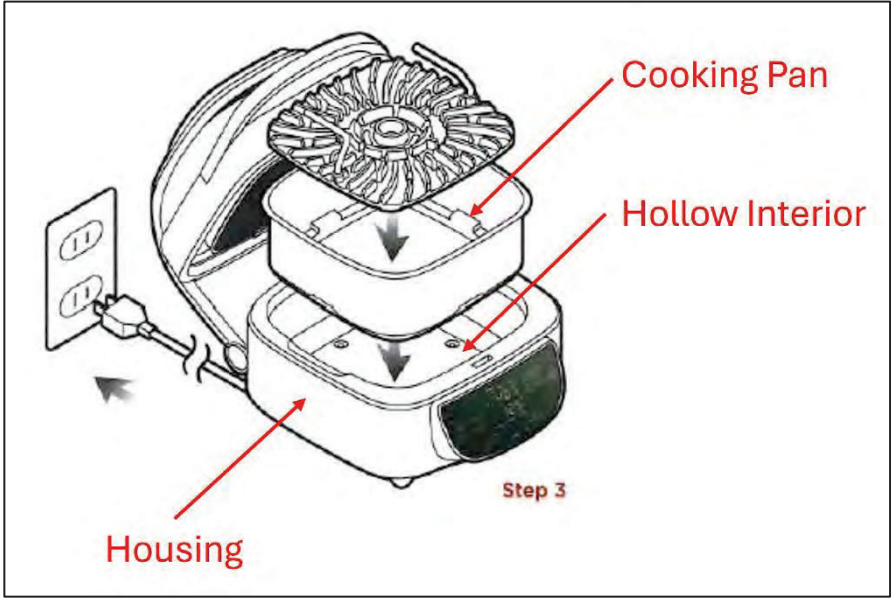


The long ribs have a length of approximately 79mm as shown in the image below of the Chefman Indoor Air Fryer + Grill:

<p>U.S. Patent No. 11,033,146</p>	<p>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</p>
	
<p>1[f] further comprising a food container receivable in said hollow interior, said support body being removably mounted within an interior of</p>	<p>The Chefman Indoor Air Fryer + Grill cooking system further comprises a food container receivable in said hollow interior, said support body being removably mounted within an interior of said food container.</p> <p>First, the Chefman Indoor Air Fryer + Grill cooking system’s cooking pan is a food container that is receivable in the hollow interior of the housing.</p> <ul style="list-style-type: none"> <li>• Ex. G at 21 (“When the preheat is done, the unit will beep, and Add Food will display on the panel. Place food in the unit and close the lid. Small items, such as cookies, can be <b>baked directly in the cooking pan</b>. For larger items, you can set a bread pan or cake pan inside the cooking pan. The timer will begin counting down once the lid is closed.”) (emphasis added).</li> </ul>

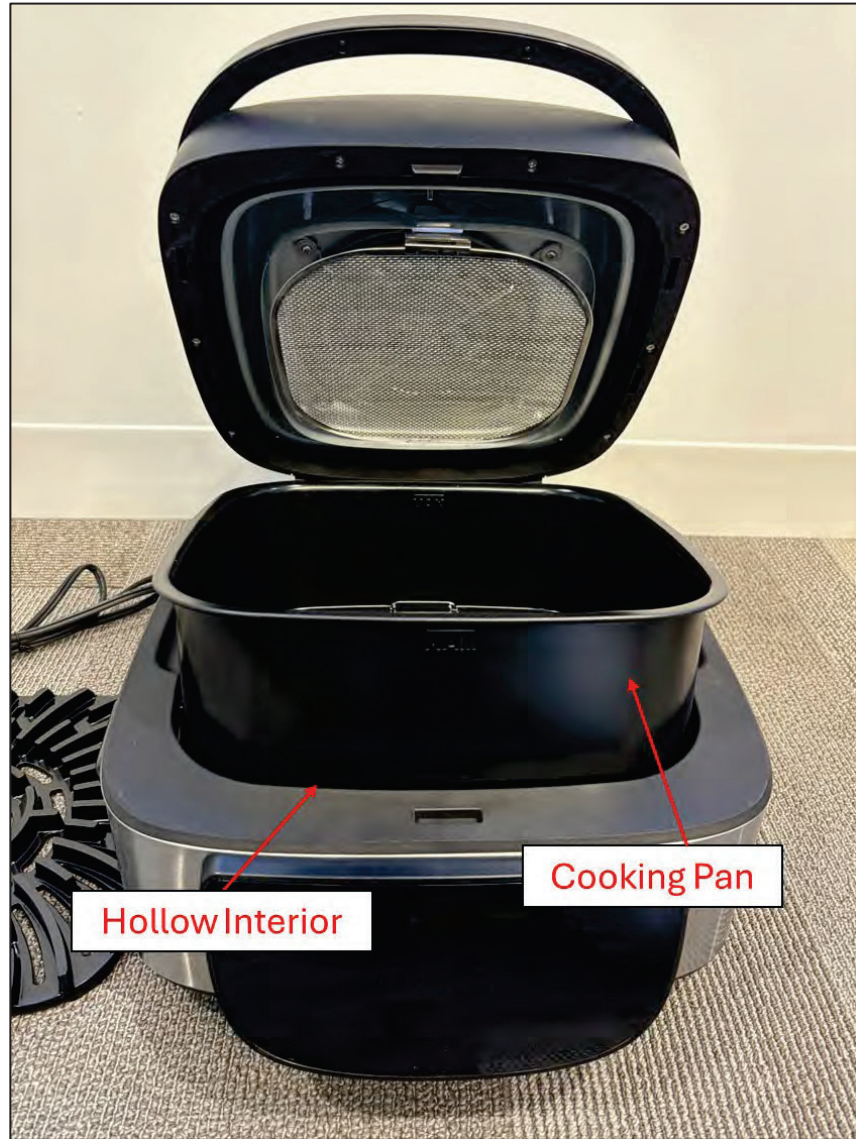
<b>U.S. Patent No. 11,033,146</b>	<b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b>
said food container.	<ul style="list-style-type: none"><li>• Chefman Indoor Air Fryer + Grill product website (Available at: <a href="https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ">https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ</a>) (showing food in the cooking pan):</li></ul>  <ul style="list-style-type: none"><li>• Ex. G at 9 (annotations added):</li></ul>

<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	<div style="border: 1px solid black; padding: 10px;"> <p><b>FEATURES</b></p>  <p><b>1. Lid:</b> contains heat source and fan</p> <p><b>2. Removable Mesh Splatter Shield:</b> inserts into lid to help keep heating element clean and prevent smoking</p> <p><b>3. Thermometer Jack:</b> powers probe</p> <p><b>4. Control Panel:</b> capacitive touch LED screen</p> <p><b>5. Nonstick Air Fryer Basket:</b> allows air to circulate around foods</p> <p><b>6. Grill Plate:</b> heavy-duty die-cast aluminum for great grill marks</p> <p><b>7. Nonstick Cooking Pan:</b> large capacity for family-size meals</p> <p><b>8. Thermometer Probe:</b> tracks internal temperature of food during cooking</p> <p><b>9. Probe Cord Winding Wheel:</b> holds cord when not in use (separate from unit)</p> </div> <ul style="list-style-type: none"> <li>• Ex. G at 14 (annotations added):</li> </ul>

<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	 <p>The diagram, labeled 'Step 3', shows a cross-section of the Chefman Indoor Air Fryer + Grill. The device consists of a base 'Housing' with a power cord plugged into a wall outlet. On top of the housing is a 'Hollow Interior' chamber. A 'Cooking Pan' is shown being inserted into this chamber. Red arrows point from the labels 'Cooking Pan', 'Hollow Interior', and 'Housing' to their respective parts in the diagram. The text 'Step 3' is located at the bottom right of the diagram.</p> <ul style="list-style-type: none"><li>• As shown in the image below of the Chefman Indoor Air Fryer + Grill, the cooking pan is inserted into the hollow interior:</li></ul>

**U.S. Patent No.  
11,033,146**

**Evidence of Infringement: Chefman Indoor Air Fryer + Grill**

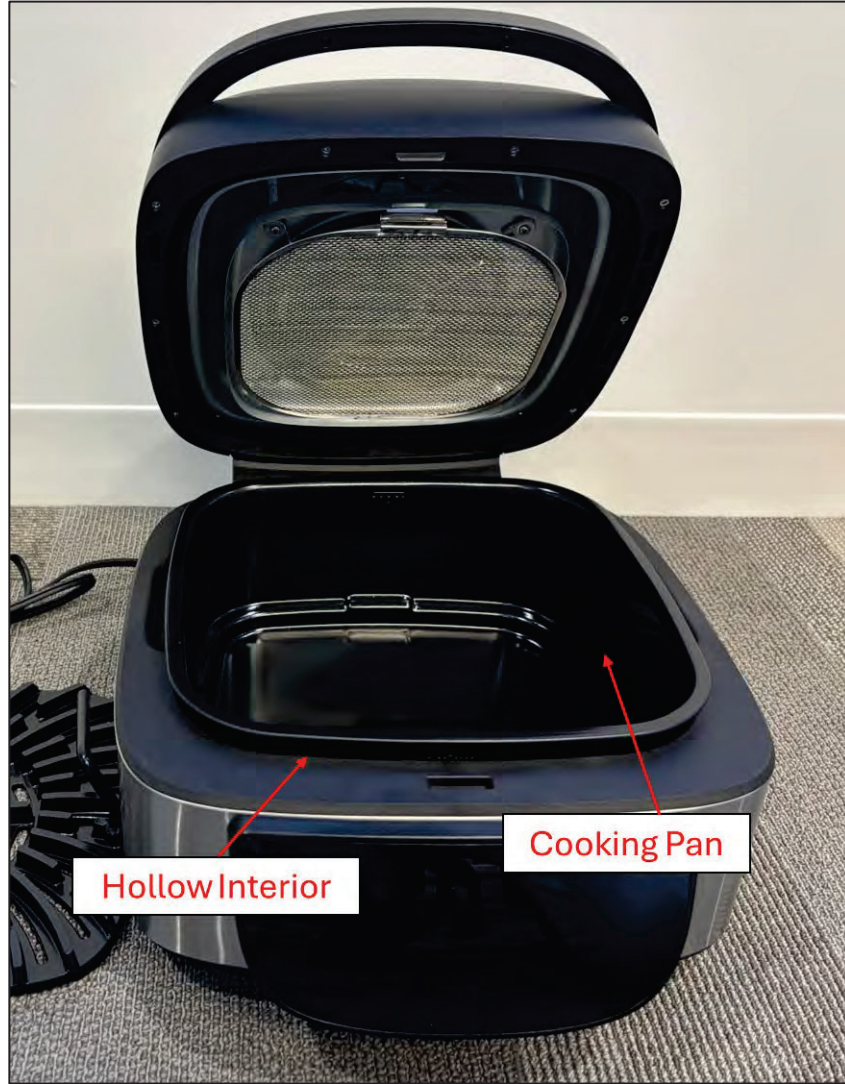


**Hollow Interior**

**Cooking Pan**

U.S. Patent No.  
11,033,146

Evidence of Infringement: Chefman Indoor Air Fryer + Grill



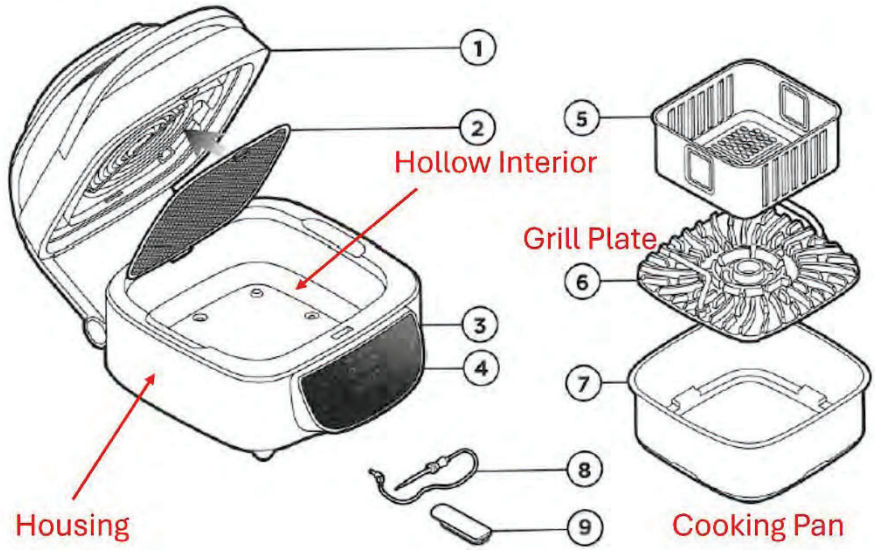
Hollow Interior

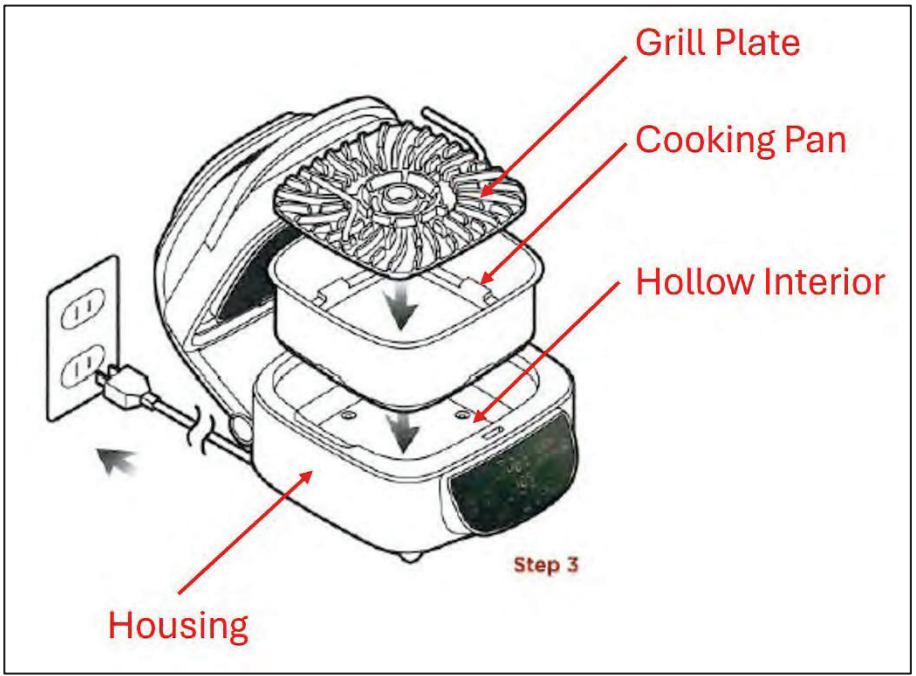
Cooking Pan

Second, the Chefman Indoor Air Fryer + Grill cooking system’s grill plate (“support structure”) is removably mounted within the cooking pan (“food container”).

- Ex. G at 9 (annotations added):

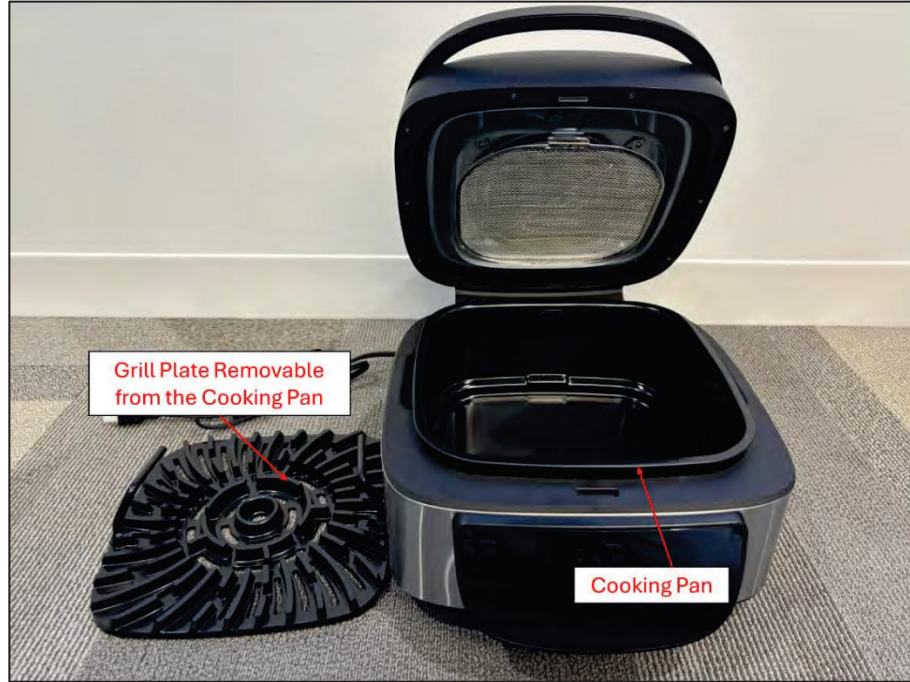



<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	<div style="border: 1px solid black; padding: 10px;"> <p><b>FEATURES</b></p>  <p>1. <b>Lid:</b> contains heat source and fan</p> <p>2. <b>Removable Mesh Splatter Shield:</b> inserts into lid to help keep heating element clean and prevent smoking</p> <p>3. <b>Thermometer Jack:</b> powers probe</p> <p>4. <b>Control Panel:</b> capacitive touch LED screen</p> <p>5. <b>Nonstick Air Fryer Basket:</b> allows air to circulate around foods</p> <p>6. <b>Grill Plate:</b> heavy-duty die-cast aluminum for great grill marks</p> <p>7. <b>Nonstick Cooking Pan:</b> large capacity for family-size meals</p> <p>8. <b>Thermometer Probe:</b> tracks internal temperature of food during cooking</p> <p>9. <b>Probe Cord Winding Wheel:</b> holds cord when not in use (separate from unit)</p> </div> <ul style="list-style-type: none"> <li>• Ex. G at 14 (annotations added):</li> </ul>

<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	 <p>The diagram, labeled 'Step 3', shows the assembly of the Chefman Indoor Air Fryer + Grill. It features a cross-section of the device with the following components labeled in red: 'Housing' at the base, 'Hollow Interior' in the middle section, 'Cooking Pan' on top of the interior, and 'Grill Plate' on top of the cooking pan. A power cord is shown plugged into a wall outlet on the left. Arrows indicate the placement of the components. The text 'Step 3' is located at the bottom right of the diagram.</p> <ul style="list-style-type: none"><li>• The images below of the Chefman Indoor Air Fryer + Grill show that the grill plate is removable from the cooking pan and can be mounted within it:</li></ul>

**U.S. Patent No.  
11,033,146**

**Evidence of Infringement: Chefman Indoor Air Fryer + Grill**



<p><b>U.S. Patent No. 11,033,146</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	 <p data-bbox="992 816 1325 978">Grill Plate Mounted within the Cooking Pan</p> <p data-bbox="899 1331 1170 1398">Cooking Pan</p>

57. On information and belief, Chefman has benefited from its infringement of the '146 patent. Chefman's use of the '146 patent has made its Electric Indoor Air Fryer + Grill more effective and better able to uniformly and evenly heat food.

58. SharkNinja has sustained damages as a direct and proximate result of Chefman's infringement of the '146 patent. Chefman has used the invention of the '146 patent to directly compete with SharkNinja and its Ninja<sup>®</sup> Indoor Grill & Air Fryers, including the Ninja<sup>®</sup> Foodi<sup>®</sup> XL 6-in-1 Indoor Grill & Air Fryer (DG500 Series), Ninja<sup>®</sup> Foodi<sup>®</sup> 6-in-1 Indoor Grill & Air Fryer (EG200 Series), Ninja<sup>®</sup> Foodi<sup>®</sup> 5-in-1 Indoor Grill & Air Fryer (AG300 Series), Ninja<sup>®</sup> Foodi<sup>®</sup> 5-in-1 Indoor Grill & Air Fryer with Integrated Smart Probe (AG400 Series), Ninja<sup>®</sup> Foodi<sup>®</sup> XL 6-in-1 Indoor Grill & Air Fryer (BG500 Series), and Ninja<sup>®</sup> Foodi<sup>®</sup> 4-in-1 Indoor Grill & Air Fryer (FG500 Series). Chefman's infringement of the '146 patent has caused irreparable harm to SharkNinja and will continue to do so unless enjoined. As a result, SharkNinja is entitled to injunctive relief pursuant to 35 U.S.C. § 283. SharkNinja also is entitled to recover damages for Chefman's infringement under 35 U.S.C. § 284. The amount of damages will be proven at trial.

59. Chefman was put on notice of its infringement of the '146 patent at least as early as August 29, 2024, when it received a letter (the "Notice Letter") from SharkNinja regarding its infringement of the '146 patent.

60. Chefman was further put on notice of its infringement of the '146 patent at least as early as the filing of the Complaint in this action.

61. Chefman's continued infringement of the '146 patent after it has received notice of the '146 patent and its infringement of the patent is intentional, knowing, and willful.

## **V. COUNT II: INFRINGEMENT OF THE '152 PATENT**

62. SharkNinja incorporates by reference and realleges the allegations in paragraphs 1–61.

63. U.S. Patent No. 11,766,152 (Exhibit B), entitled “Cooking Device and Components Thereof,” was duly and properly issued by the United States Patent and Trademark Office (“USPTO”) on September 26, 2023.

64. SharkNinja owns all rights, title, and interest in the ’152 patent.

65. The application for the ’152 patent was filed on May 26, 2021 and claims priority to an application filed on February 25, 2019.

66. Chefman has infringed, and continues to infringe, one or more claims of the ’152 patent, including at least claim 1, in violation of 35 U.S.C. § 271 by, among other things, making, using, offering to sell, and/or selling within the United States, supplying or causing to be supplied in or from the United States, and/or importing into the United States, without authority or license, the Chefman Electric Indoor Air Fryer + Grill.

67. The claim chart below details examples of Chefman’s infringement, using the Chefman Electric Indoor Air Fryer + Grill, 5-in-1, Removable Integrated Probe Thermometer version of the Chefman Electric Indoor Air Fryer + Grill.

U.S. Patent No. 11,766,152	Evidence of Infringement: Chefman Indoor Air Fryer + Grill
<p>1[pre]</p> <p>A cooking system, comprising:</p>	<p>The Chefman Indoor Air Fryer + Grill is a cooking system.</p> <p>For example, the Chefman Indoor Air Fryer + Grill is a system that cooks foods using one of five cooking “functions,” including “Grill,” “Air Fry,” “Roast,” “Bake,” and “Broil:”</p> <ul style="list-style-type: none"> <li>• Ex. G at 11:</li> </ul>

<b>U.S. Patent No. 11,766,152</b>	<b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b>																														
<div style="border: 1px solid black; padding: 10px;"> <p><b>FEATURES</b></p> <p><b>COOKING FUNCTIONS AT A GLANCE</b></p> <p>All five functions require the cooking pan to be inserted and can all be used with the probe. They differ in their temperature range, inserts used, and whether they include a Flip/Stir notification. (Note that you can ignore or amend the notification as desired.)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #333; color: white;">Function</th> <th style="background-color: #333; color: white;">Pan/Insert(s) Used</th> <th style="background-color: #333; color: white;">Temperature Range (°F)</th> <th style="background-color: #333; color: white;">Flip/Stir Notification?</th> <th style="background-color: #333; color: white;">Can You Use with Probe?</th> </tr> </thead> <tbody> <tr> <td>Grill</td> <td>Cooking Pan + Grill Plate</td> <td>200-500</td> <td>Yes. Flip halfway through cooking time.</td> <td>Yes</td> </tr> <tr> <td>Air Fry</td> <td>Cooking Pan + Air Fry Basket</td> <td>200-450</td> <td>Yes. Stir halfway through cooking time or every 15 minutes for longer cycles.</td> <td>Yes</td> </tr> <tr> <td>Roast</td> <td>Cooking Pan</td> <td>200-450</td> <td>Yes. Stir halfway through cooking time.</td> <td>Yes</td> </tr> <tr> <td>Bake</td> <td>Cooking Pan (can add an 8-inch cake pan or loaf pan, not included)</td> <td>200-450</td> <td>No</td> <td>Yes</td> </tr> <tr> <td>Broil</td> <td>Cooking Pan</td> <td>Two settings: Low (450) and High (500)</td> <td>No</td> <td>Yes</td> </tr> </tbody> </table> </div> <p>The Chefman Indoor Air Fryer + Grill cooking system includes different pans or inserts that can be used to cook food in the different cooking functions. For example, the “Grill Plate” is used when cooking food with the “Grill” function:</p> <ul style="list-style-type: none"> <li>• Ex. G at 11 (annotations added):</li> </ul>		Function	Pan/Insert(s) Used	Temperature Range (°F)	Flip/Stir Notification?	Can You Use with Probe?	Grill	Cooking Pan + Grill Plate	200-500	Yes. Flip halfway through cooking time.	Yes	Air Fry	Cooking Pan + Air Fry Basket	200-450	Yes. Stir halfway through cooking time or every 15 minutes for longer cycles.	Yes	Roast	Cooking Pan	200-450	Yes. Stir halfway through cooking time.	Yes	Bake	Cooking Pan (can add an 8-inch cake pan or loaf pan, not included)	200-450	No	Yes	Broil	Cooking Pan	Two settings: Low (450) and High (500)	No	Yes
Function	Pan/Insert(s) Used	Temperature Range (°F)	Flip/Stir Notification?	Can You Use with Probe?																											
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Bake	Cooking Pan (can add an 8-inch cake pan or loaf pan, not included)	200-450	No	Yes																											
Broil	Cooking Pan	Two settings: Low (450) and High (500)	No	Yes																											

**U.S. Patent No. 11,766,152** **Evidence of Infringement: Chefman Indoor Air Fryer + Grill**

**FEATURES**

**COOKING FUNCTIONS AT A GLANCE**


All five functions require the cooking pan to be inserted and can all be used with the probe. They differ in their temperature range, inserts used, and whether they include a Flip/Stir notification. (Note that you can ignore or amend the notification as desired.)

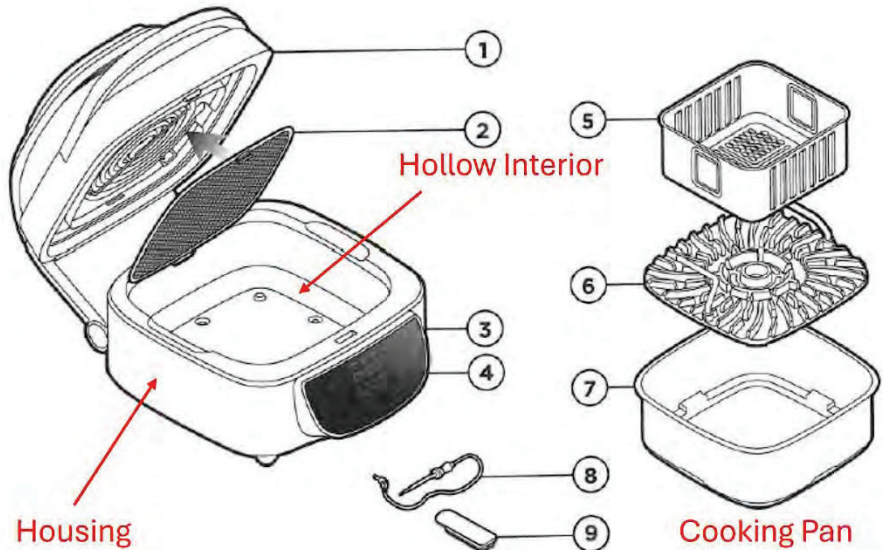
Function	Pan/Insert(s) Used	Temperature Range (°F)	Flip/Stir Notification?	Can You Use with Probe?
Grill	Cooking Pan + Grill Plate	200-500	Yes. Flip halfway through cooking time.	Yes
Air Fry	Cooking Pan + Air Fry Basket	200-450	Yes. Stir halfway through cooking time or every 15 minutes for longer cycles.	Yes
Roast	Cooking Pan	200-450	Yes. Stir halfway through cooking time.	Yes
Bake	Cooking Pan (can add an 8-inch cake pan or loaf pan, not included)	200-450	No	Yes
Broil	Cooking Pan	Two settings: Low (450) and High (500)	No	Yes

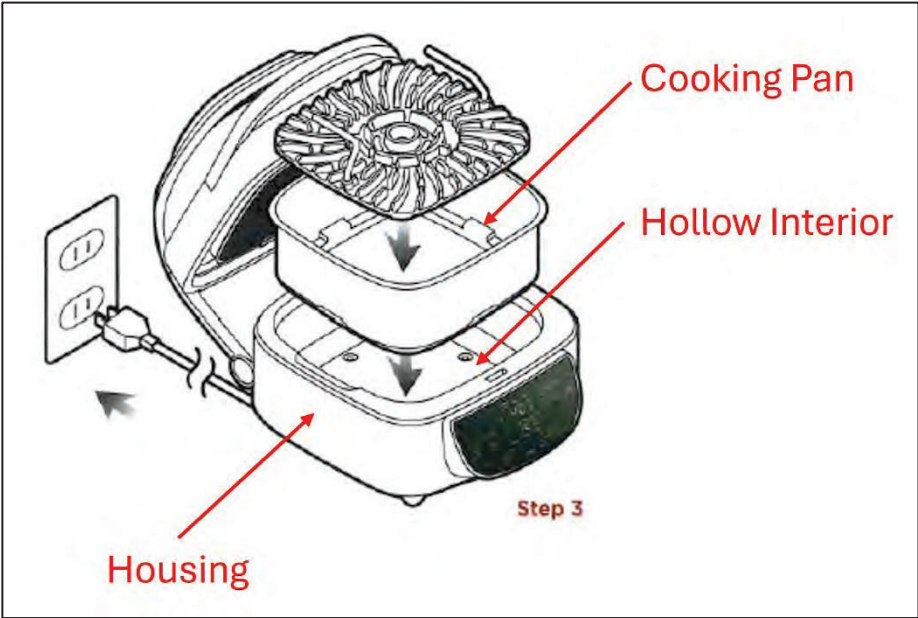
- Ex. G at 19 (annotations added):



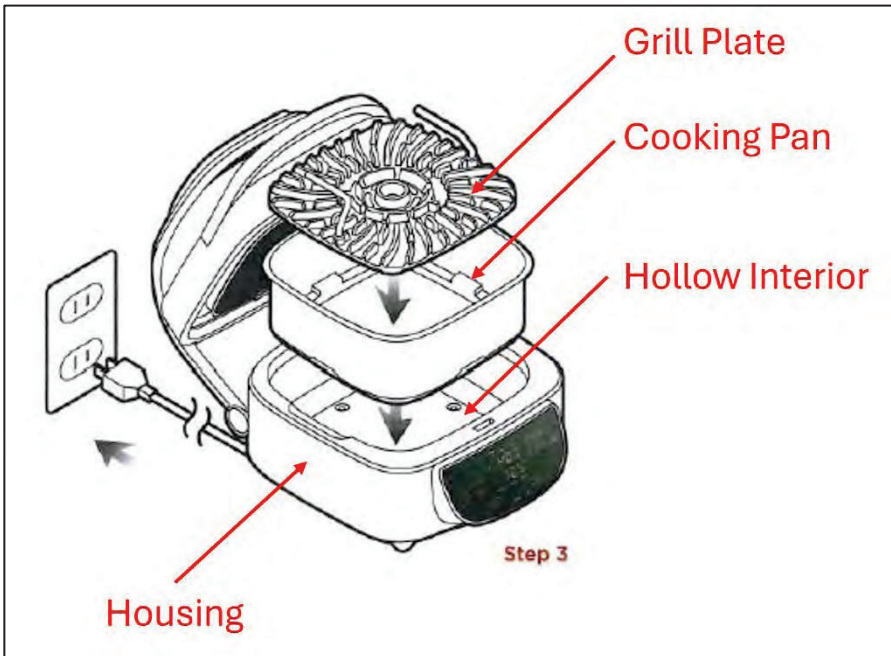
<p><b>U.S. Patent No. 11,766,152</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	<div style="border: 1px solid black; padding: 10px;"> <p style="text-align: center;"><b>OPERATING INSTRUCTIONS</b></p> <p><b>HOW TO GRILL</b></p> <p>The heavy-duty grill plate is excellent at absorbing and retaining heat, so it gives your food the same gorgeous grill marks you'd get on an outdoor grill, while the closed environment cooks it to juicy perfection. The directions below are for cooking without the probe; if you would rather grill to a specific internal temperature, see How to Cook Using the Probe Thermometer on p. 9.</p> <ol style="list-style-type: none"> <li>1. Set the unit on a hard, flat surface with at least 6 inches of clearance on the top and sides. Put the cooking pan in the unit and set the grill plate inside. Ensure the splatter shield is firmly in place and close the lid. Plug in the unit.</li> <li>2. Prepare your food as specified in your recipe.</li> <li>3. Press Grill on the control panel. The Grill button will illuminate in blue, and the default temperature of 450°F will appear on the panel, with the bar above Med lit up (medium grill temperature).</li> <li>4. Set the temperature and time. Press + or - on the Temp button to adjust the temperature from 200°F to 500°F in increments of 5°F (the bar may move to the High or Low setting). Press + or - on the Time button to adjust the time from 1 to 60 minutes (20 minutes max if grilling at 500°F) in increments of 1 minute.</li> <li>5. Press Start/Stop. This will begin the unit's automatic preheat.</li> <li>6. When the preheat is done, the unit will beep, and Add Food will display on the panel. Place food on the grill plate. <b>CAUTION:</b> The grill plate and grill plate handles will be hot.</li> <li>7. Close the lid. The timer will begin counting down.</li> <li>8. When the timer is halfway done, the unit will beep, and Flip will display on the panel. Flip foods as needed. Cooking will continue and the timer will resume counting down once the lid is closed.</li> <li>9. When time is up, the unit will beep, and End will display on the panel. Carefully remove the food. <b>CAUTION:</b> Grill plate handles are hot. Check food for doneness, and enjoy.</li> </ol> </div> <ul style="list-style-type: none"> <li>• An image of the Chefman Indoor Air Fryer + Grill cooking system with a grill plate is shown below:</li> </ul>

<p><b>U.S. Patent No. 11,766,152</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	
<p>1[a] a housing having a hollow interior configured to receive food therein;</p>	<p>The Chefman Indoor Air Fryer + Grill cooking system includes a housing having a hollow interior configured to receive food therein.</p> <p>First, the Chefman Indoor Air Fryer + Grill cooking system includes a housing having a hollow interior. A cooking pan or other inserts can be placed within the hollow interior.</p> <ul style="list-style-type: none"> <li>• Ex. G at 9 (annotations added):</li> </ul>

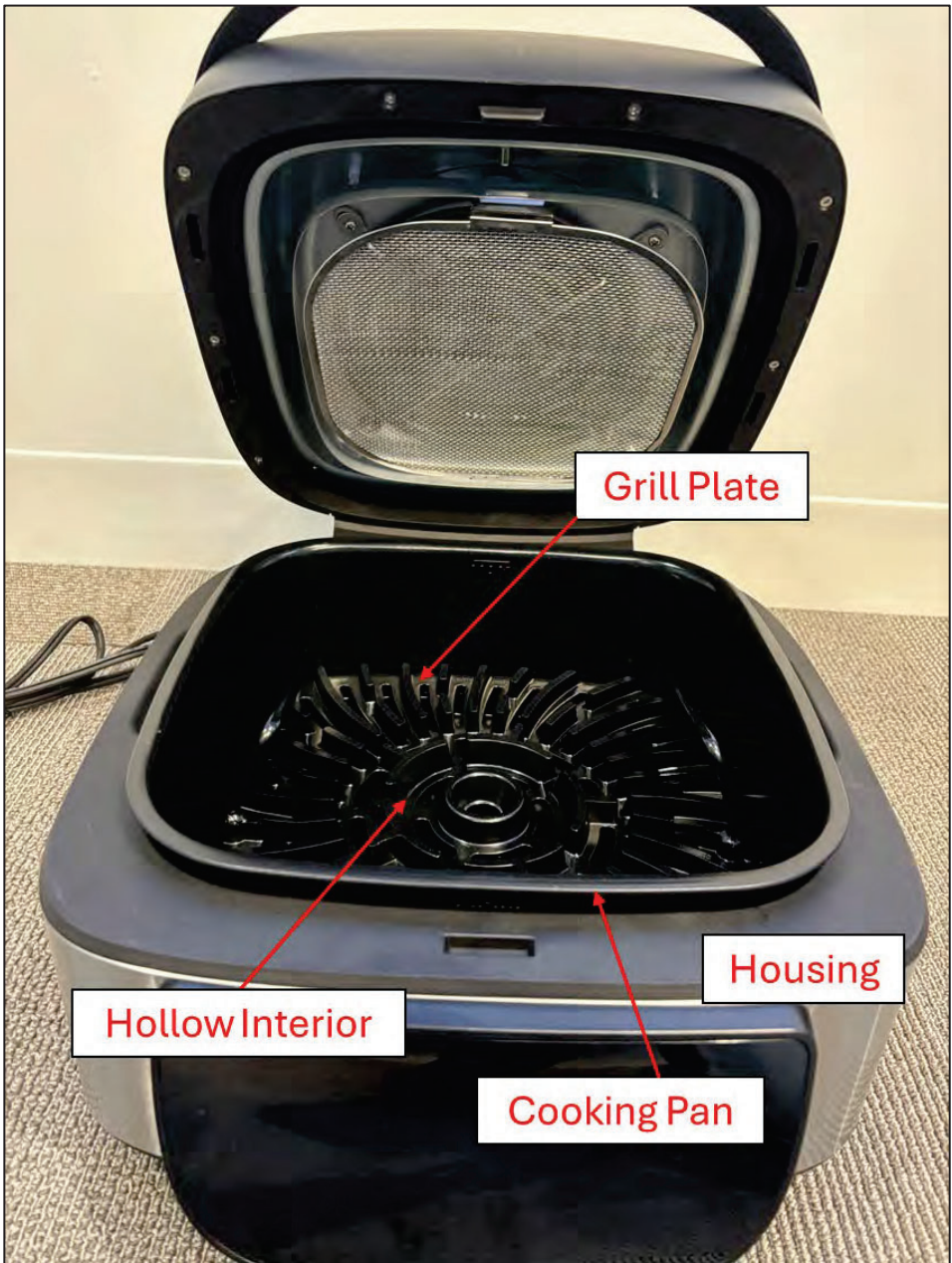
<p><b>U.S. Patent No. 11,766,152</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	<div style="border: 1px solid black; padding: 10px;"> <p><b>FEATURES</b></p>  <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <ol style="list-style-type: none"> <li>1. <b>Lid:</b> contains heat source and fan</li> <li>2. <b>Removable Mesh Splatter Shield:</b> inserts into lid to help keep heating element clean and prevent smoking</li> <li>3. <b>Thermometer Jack:</b> powers probe</li> <li>4. <b>Control Panel:</b> capacitive touch LED screen</li> <li>5. <b>Nonstick Air Fryer Basket:</b> allows air to circulate around foods</li> </ol> </div> <div style="width: 45%;"> <ol style="list-style-type: none"> <li>6. <b>Grill Plate:</b> heavy-duty die-cast aluminum for great grill marks</li> <li>7. <b>Nonstick Cooking Pan:</b> large capacity for family-size meals</li> <li>8. <b>Thermometer Probe:</b> tracks internal temperature of food during cooking</li> <li>9. <b>Probe Cord Winding Wheel:</b> holds cord when not in use (separate from unit)</li> </ol> </div> </div> </div> <p>• Ex. G at 14 (annotations added):</p>

<p><b>U.S. Patent No. 11,766,152</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	 <p>Second, the housing with the hollow interior is configured to receive food. For example, the cooking pan placed inside the hollow interior is configured to hold food or an additional component such as a grill plate. The food is placed in the cooking pan or on the grill plate for cooking.</p> <ul style="list-style-type: none"><li>• Ex. G at 9 (annotations added):</li></ul>


<p><b>U.S. Patent No. 11,766,152</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	<div data-bbox="446 357 1388 1312"> <p><b>FEATURES</b></p> <p><b>Housing</b></p> <p><b>Hollow Interior</b></p> <p><b>Grill Plate</b></p> <p><b>Cooking Pan</b></p> <ol style="list-style-type: none"> <li>1. <b>Lid:</b> contains heat source and fan</li> <li>2. <b>Removable Mesh Splatter Shield:</b> inserts into lid to help keep heating element clean and prevent smoking</li> <li>3. <b>Thermometer Jack:</b> powers probe</li> <li>4. <b>Control Panel:</b> capacitive touch LED screen</li> <li>5. <b>Nonstick Air Fryer Basket:</b> allows air to circulate around foods</li> <li>6. <b>Grill Plate:</b> heavy-duty die-cast aluminum for great grill marks</li> <li>7. <b>Nonstick Cooking Pan:</b> large capacity for family-size meals</li> <li>8. <b>Thermometer Probe:</b> tracks internal temperature of food during cooking</li> <li>9. <b>Probe Cord Winding Wheel:</b> holds cord when not in use (separate from unit)</li> </ol> </div> <ul style="list-style-type: none"> <li>• Ex. G at 14 (annotations added):</li> </ul>


<p><b>U.S. Patent No. 11,766,152</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	 <p>The diagram shows a cross-section of an air fryer with its lid open. A power cord is plugged into a wall outlet on the left. The device is labeled 'Step 3' in the bottom right corner. Red arrows point to various components: 'Housing' at the base, 'Hollow Interior' in the middle section, 'Cooking Pan' in the upper section, and 'Grill Plate' at the top. The grill plate has a circular pattern of holes. The cooking pan is a shallow, rectangular container. The interior of the fryer is shown to be hollow. The lid is hinged and is open, revealing the internal components.</p> <ul style="list-style-type: none"><li>• Ex. G at 19 (annotations added):</li></ul>

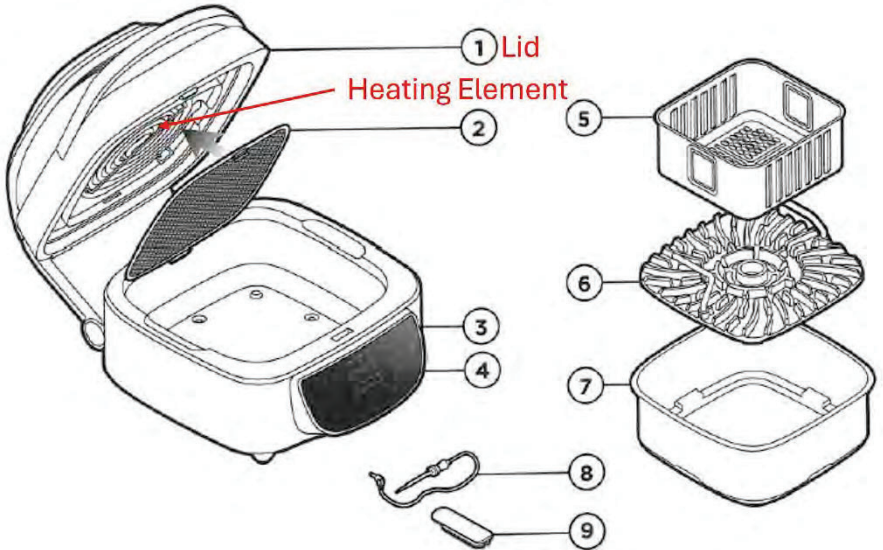
<p><b>U.S. Patent No. 11,766,152</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	<div style="border: 1px solid black; padding: 10px;"> <p style="text-align: center;"><b>OPERATING INSTRUCTIONS</b></p> <p><b>HOW TO GRILL</b></p> <p>The heavy-duty grill plate is excellent at absorbing and retaining heat, so it gives your food the same gorgeous grill marks you'd get on an outdoor grill, while the closed environment cooks it to juicy perfection. The directions below are for cooking without the probe; if you would rather grill to a specific internal temperature, see How to Cook Using the Probe Thermometer on p. 9.</p> <ol style="list-style-type: none"> <li>1. Set the unit on a hard, flat surface with at least 6 inches of clearance on the top and sides. Put the cooking pan in the unit and set the grill plate inside. Ensure the splatter shield is firmly in place and close the lid. Plug in the unit.</li> <li>2. Prepare your food as specified in your recipe.</li> <li>3. Press Grill on the control panel. The Grill button will illuminate in blue, and the default temperature of 450°F will appear on the panel, with the bar above Med lit up (medium grill temperature).</li> <li>4. Set the temperature and time. Press + or - on the Temp button to adjust the temperature from 200°F to 500°F in increments of 5°F (the bar may move to the High or Low setting). Press + or - on the Time button to adjust the time from 1 to 60 minutes (20 minutes max if grilling at 500°F) in increments of 1 minute.</li> <li>5. Press Start/Stop. This will begin the unit's automatic preheat.</li> <li>6. When the preheat is done, the unit will beep, and Add Food will display on the panel. Place food on the grill plate. <b>CAUTION:</b> The grill plate and grill plate handles will be hot.</li> <li>7. Close the lid. The timer will begin counting down.</li> <li>8. When the timer is halfway done, the unit will beep, and Flip will display on the panel. Flip foods as needed. Cooking will continue and the timer will resume counting down once the lid is closed.</li> <li>9. When time is up, the unit will beep, and End will display on the panel. Carefully remove the food. <b>CAUTION:</b> Grill plate handles are hot. Check food for doneness, and enjoy.</li> </ol> </div> <ul style="list-style-type: none"> <li>• As shown in the image below of the Chefman Indoor Air Fryer + Grill, when the grill plate and cooking pan are placed within the housing, food placed on the grill plate is within the hollow interior of the housing:</li> </ul>

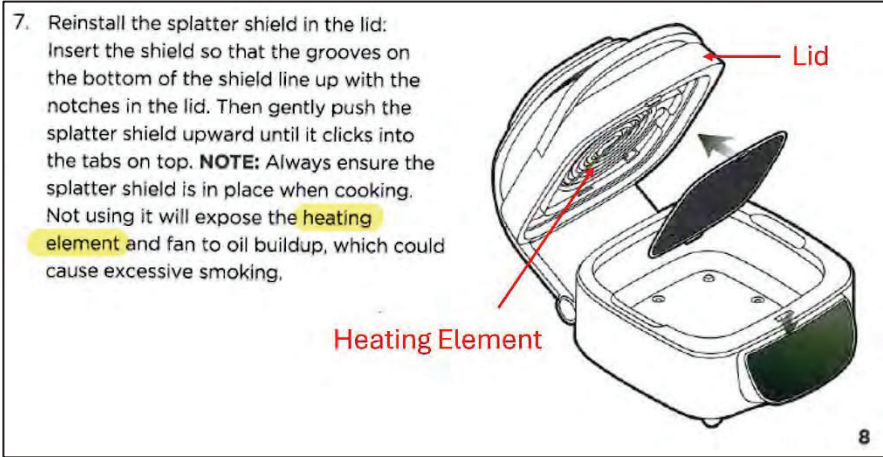
<p><b>U.S. Patent No. 11,766,152</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	 <ul style="list-style-type: none"><li>• Chefman Indoor Air Fryer + Grill product website (Available at: <a href="https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ">https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ</a>):</li></ul>

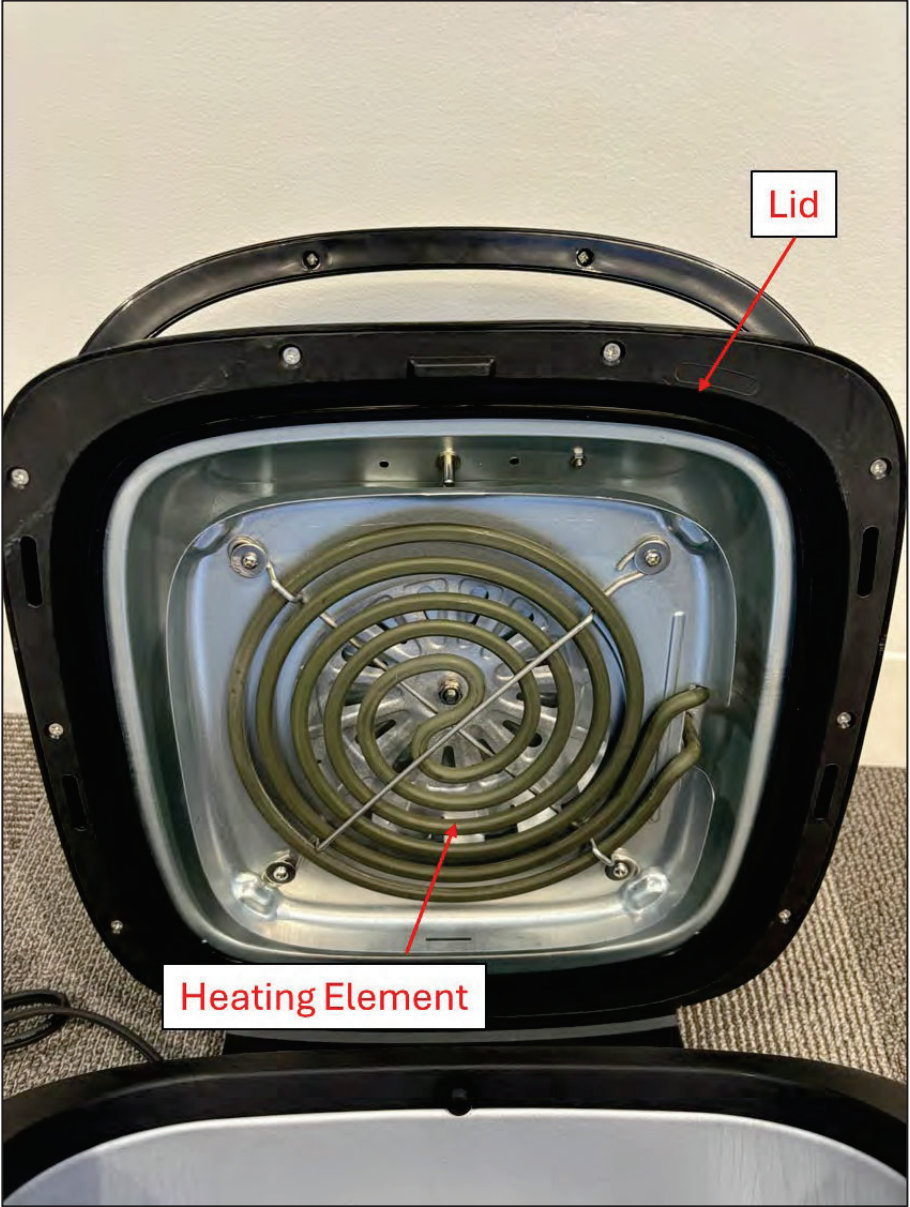


<p><b>U.S. Patent No. 11,766,152</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	<div data-bbox="446 357 1372 1291"><p><b>AN AUTHENTIC GRILLING EXPERIENCE</b> Heavy-duty die-cast aluminum grill grate creates gorgeous grill marks and adds that authentic grilled flavor</p></div> <ul data-bbox="446 1323 1323 1480" style="list-style-type: none"><li>• Chefman Indoor Air Fryer + Grill product website (Available at: <a href="https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ">https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ</a>):</li></ul>


<p><b>U.S. Patent No. 11,766,152</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	
<p>1[b] a heating element associated with the housing; and</p>	<p>The Chefman Indoor Air Fryer + Grill cooking system includes a heating element associated with the housing.</p> <p>The '152 patent explains that a heating element is associated with the housing at least when the heating element is mounted within the lid of the housing. <i>See, e.g.</i>, '152 patent, Fig. 3, 6:54-55 (“the at least one heating element 82 is mounted within the lid 24”). The Chefman Indoor Air Fryer + Grill cooking system includes the same feature: an electric heating element is mounted to the lid of the housing.</p> <ul style="list-style-type: none"> <li>• Ex. G at 9 (annotations added):</li> </ul>


<p><b>U.S. Patent No. 11,766,152</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	<p><b>FEATURES</b></p>  <p>1. <b>Lid:</b> contains heat source and fan</p> <p>2. <b>Removable Mesh Splatter Shield:</b> inserts into lid to help keep heating element clean and prevent smoking</p> <p>3. <b>Thermometer Jack:</b> powers probe</p> <p>4. <b>Control Panel:</b> capacitive touch LED screen</p> <p>5. <b>Nonstick Air Fryer Basket:</b> allows air to circulate around foods</p> <p>6. <b>Grill Plate:</b> heavy-duty die-cast aluminum for great grill marks</p> <p>7. <b>Nonstick Cooking Pan:</b> large capacity for family-size meals</p> <p>8. <b>Thermometer Probe:</b> tracks internal temperature of food during cooking</p> <p>9. <b>Probe Cord Winding Wheel:</b> holds cord when not in use (separate from unit)</p> <ul style="list-style-type: none"> <li>• Ex. G at 12 (annotations added):</li> </ul>

<p><b>U.S. Patent No. 11,766,152</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	<p>7. Reinstall the splatter shield in the lid: Insert the shield so that the grooves on the bottom of the shield line up with the notches in the lid. Then gently push the splatter shield upward until it clicks into the tabs on top. <b>NOTE:</b> Always ensure the splatter shield is in place when cooking. Not using it will expose the heating element and fan to oil buildup, which could cause excessive smoking.</p>  <ul style="list-style-type: none"><li>• The image below of the Chefman Indoor Air Fryer + Grill shows the heating element mounted to the lid of the housing:</li></ul>

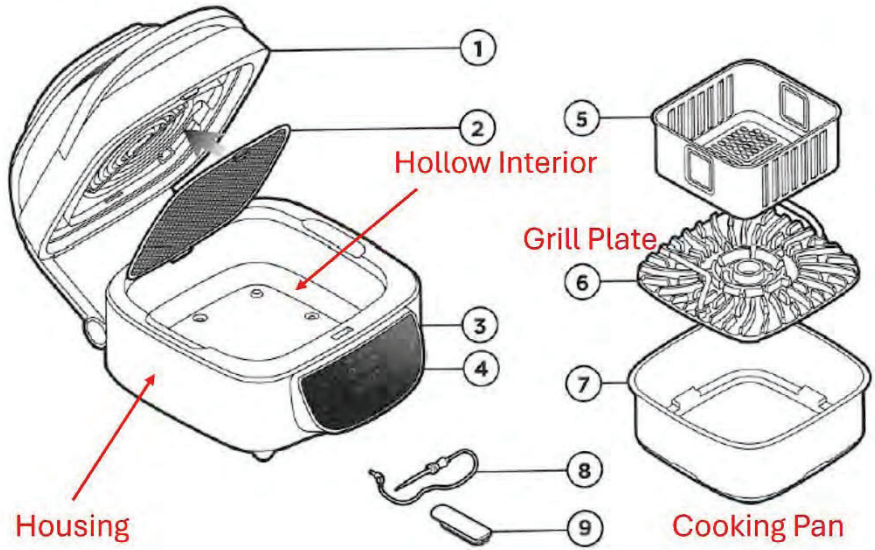
<p><b>U.S. Patent No. 11,766,152</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	 <p>The image shows the interior of a black air fryer with its lid open. A green, spiral-shaped heating element is mounted on a silver-colored metal support body. A red arrow points from a white box labeled "Lid" to the top edge of the fryer's outer casing. Another red arrow points from a white box labeled "Heating Element" to the spiral element. The support body has several screws visible around its perimeter.</p>
<p>1[c] a support body configured to support food within the</p>	<p>The Chefman Indoor Air Fryer + Grill cooking system includes a support body configured to support food within the hollow interior, the support body including a support surface and an outer edge, wherein the support surface includes a plurality of diffuser ribs, the plurality of diffuser ribs being curved and including first ribs, second ribs, and third ribs, the first ribs extending radially inward between the outer edge to a first radial position on the</p>

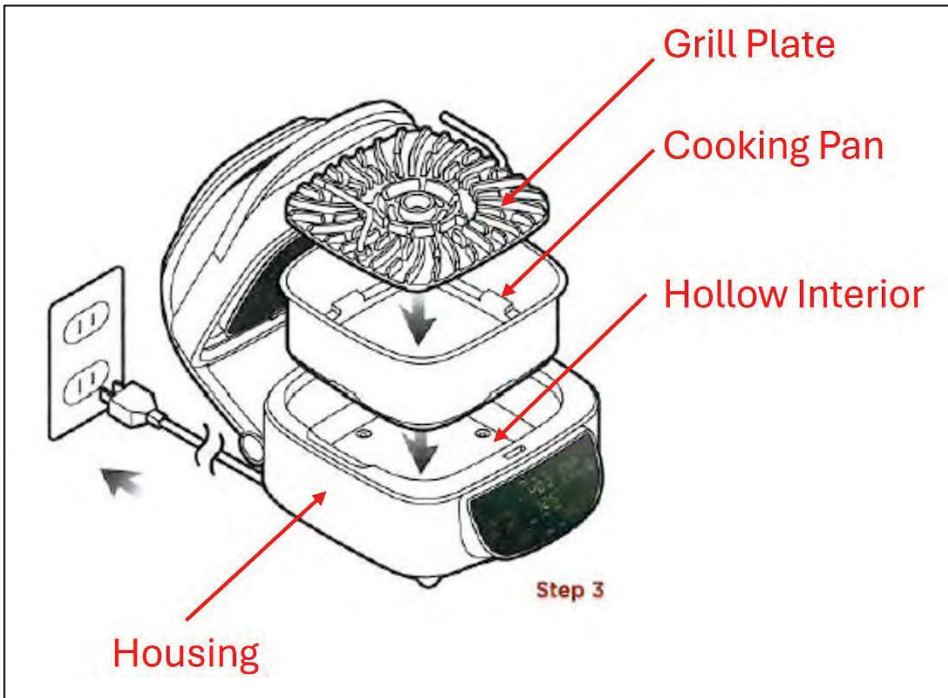
<p><b>U.S. Patent No. 11,766,152</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
<p>hollow interior, the support body including a support surface and an outer edge, wherein the support surface includes a plurality of diffuser ribs, the plurality of diffuser ribs being curved and including first ribs, second ribs, and third ribs, the first ribs extending radially inward between the outer edge to a first radial position on the support surface, the second ribs extending radially inward between the outer edge to a second radial position, and the third ribs extending radially inward between the outer edge to a third radial position, the first, second, and third radial positions being different from one another.</p>	<p>support surface, the second ribs extending radially inward between the outer edge to a second radial position, and the third ribs extending radially inward between the outer edge to a third radial position, the first, second, and third radial positions being different from one another.</p> <p>First, the Chefman Indoor Air Fryer + Grill cooking system includes a support body configured to support food within the hollow interior. Specifically, the Chefman Indoor Air Fryer + Grill cooking system includes a grill plate that is a support body and supports food within the hollow interior.</p> <ul style="list-style-type: none"> <li>• Ex. G at 19 (annotations added):</li> </ul> <div data-bbox="448 787 1362 1713" style="border: 1px solid black; padding: 10px;"> <p><b>OPERATING INSTRUCTIONS</b></p> <p><b>HOW TO GRILL</b></p> <p>The heavy-duty grill plate is excellent at absorbing and retaining heat, so it gives your food the same gorgeous grill marks you'd get on an outdoor grill, while the closed environment cooks it to juicy perfection. The directions below are for cooking without the probe; if you would rather grill to a specific internal temperature, see How to Cook Using the Probe Thermometer on p. 9.</p> <ol style="list-style-type: none"> <li>1. Set the unit on a hard, flat surface with at least 6 inches of clearance on the top and sides. Put the cooking pan in the unit and set the grill plate inside. Ensure the splatter shield is firmly in place and close the lid. Plug in the unit.</li> <li>2. Prepare your food as specified in your recipe.</li> <li>3. Press Grill on the control panel. The Grill button will illuminate in blue, and the default temperature of 450°F will appear on the panel, with the bar above Med lit up (medium grill temperature).</li> <li>4. Set the temperature and time. Press + or - on the Temp button to adjust the temperature from 200°F to 500°F in increments of 5°F (the bar may move to the High or Low setting). Press + or - on the Time button to adjust the time from 1 to 60 minutes (20 minutes max if grilling at 500°F) in increments of 1 minute.</li> <li>5. Press Start/Stop. This will begin the unit's automatic preheat.</li> <li>6. When the preheat is done, the unit will beep, and Add Food will display on the panel. Place food on the grill plate. <b>CAUTION: The grill plate and grill plate handles will be hot.</b></li> <li>7. Close the lid. The timer will begin counting down.</li> <li>8. When the timer is halfway done, the unit will beep, and Flip will display on the panel. Flip foods as needed. Cooking will continue and the timer will resume counting down once the lid is closed.</li> <li>9. When time is up, the unit will beep, and End will display on the panel. Carefully remove the food. <b>CAUTION: Grill plate handles are hot. Check food for doneness, and enjoy.</b></li> </ol> </div> <ul style="list-style-type: none"> <li>• Chefman Indoor Air Fryer + Grill product website (Available at: <a href="https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-">https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-</a></li> </ul>


<p><b>U.S. Patent No. 11,766,152</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
<p>different from one another.</p>	<p>KKyc5sDhyUz50WkOWjQ):</p> <div data-bbox="448 428 1377 1356"><p><b>AN AUTHENTIC GRILLING EXPERIENCE</b> Heavy-duty die-cast aluminum grill grate creates gorgeous grill marks and adds that authentic grilled flavor</p></div> <ul style="list-style-type: none"><li>• Chefman Indoor Air Fryer + Grill product website (Available at: <a href="https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ">https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ</a>):</li></ul>

<p><b>U.S. Patent No. 11,766,152</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	 <ul style="list-style-type: none"><li>• Ex. G at 9 (annotations added):</li></ul>

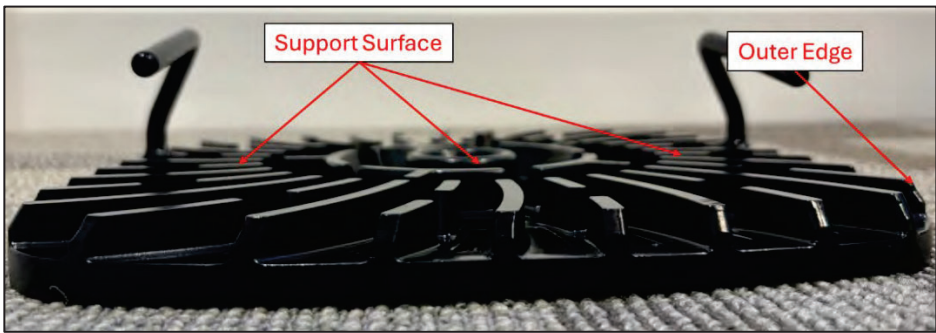
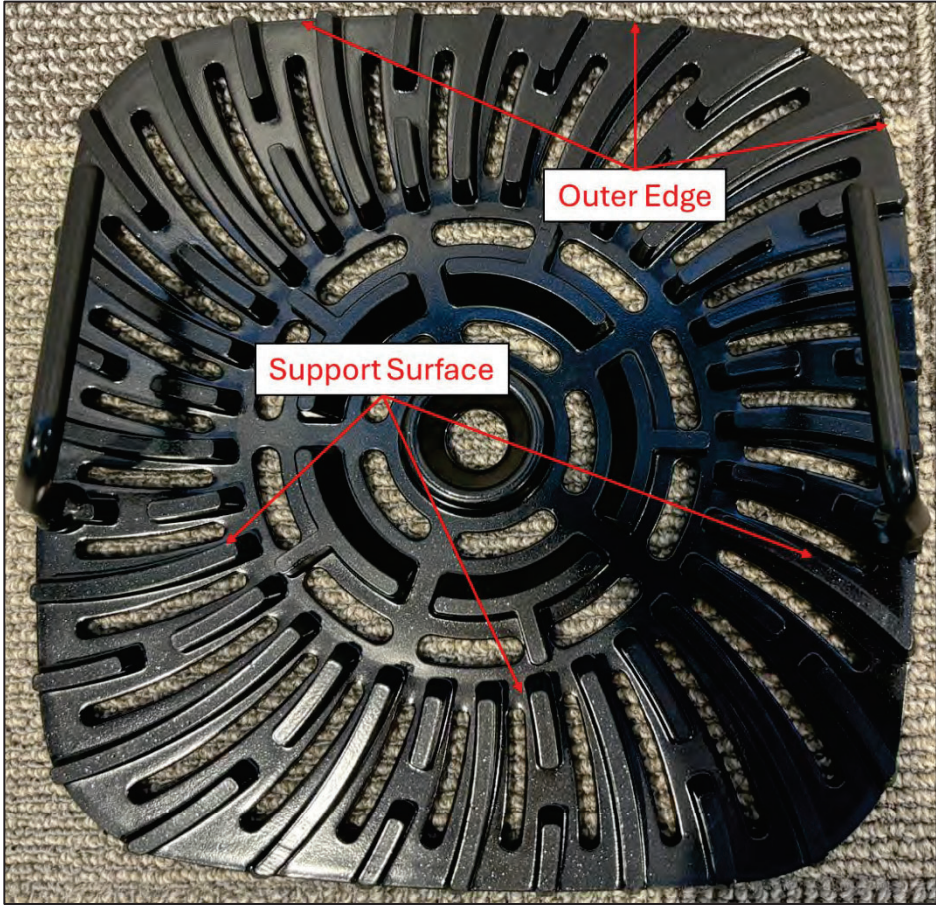


<p><b>U.S. Patent No. 11,766,152</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	<div style="border: 1px solid black; padding: 10px;"> <p><b>FEATURES</b></p>  <p>1. <b>Lid:</b> contains heat source and fan</p> <p>2. <b>Removable Mesh Splatter Shield:</b> inserts into lid to help keep heating element clean and prevent smoking</p> <p>3. <b>Thermometer Jack:</b> powers probe</p> <p>4. <b>Control Panel:</b> capacitive touch LED screen</p> <p>5. <b>Nonstick Air Fryer Basket:</b> allows air to circulate around foods</p> <p>6. <b>Grill Plate:</b> heavy-duty die-cast aluminum for great grill marks</p> <p>7. <b>Nonstick Cooking Pan:</b> large capacity for family-size meals</p> <p>8. <b>Thermometer Probe:</b> tracks internal temperature of food during cooking</p> <p>9. <b>Probe Cord Winding Wheel:</b> holds cord when not in use (separate from unit)</p> </div> <ul style="list-style-type: none"> <li>• Ex. G at 14 (annotations added):</li> </ul>

<p><b>U.S. Patent No. 11,766,152</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	 <p>The diagram shows the assembly of the Chefman Indoor Air Fryer + Grill. It features a main housing with a lid on the left and a digital display on the right. A power cord is plugged into a wall outlet on the left. The assembly consists of three main components: a Grill Plate at the top, a Cooking Pan in the middle, and a Hollow Interior at the bottom. Red arrows point from text labels to each of these components. The text 'Step 3' is located at the bottom right of the diagram area.</p> <ul style="list-style-type: none"><li>• The top and side views of the grill plate (i.e., support body) are shown in the images below of the Chefman Indoor Air Fryer + Grill:</li></ul>


<p><b>U.S. Patent No. 11,766,152</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	 <p>Second, the support body of the Chefman Indoor Air Fryer + Grill cooking system (grill plate) includes a support surface and an outer edge, as shown in the image below of the grill plate of the Chefman Indoor Air Fryer + Grill:</p>

<p>U.S. Patent No. 11,766,152</p>	<p>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</p>
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As shown below, the top of the grill plate supports food:

- Chefman Indoor Air Fryer + Grill product website (Available at: <https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg->

<p>U.S. Patent No. 11,766,152</p>	<p>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</p>
	<p>KKyc5sDhyUz50WkOWjQ):</p> <div data-bbox="448 428 1406 1386"><p><b>AN AUTHENTIC GRILLING EXPERIENCE</b> Heavy-duty die-cast aluminum grill grate creates gorgeous grill marks and adds that authentic grilled flavor</p></div> <ul style="list-style-type: none"><li>• Chefman Indoor Air Fryer + Grill product website (Available at: <a href="https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ):">https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ):</a></li></ul>

<p><b>U.S. Patent No. 11,766,152</b></p>	<p><b>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</b></p>
	<div data-bbox="444 352 1344 863" data-label="Image"> </div> <p>Third, the support surface of the Chefman Indoor Air Fryer + Grill cooking system (grill plate) includes a plurality of diffuser ribs, the plurality of diffuser ribs being curved and including first ribs, second ribs, and third ribs.</p> <ul style="list-style-type: none"> <li>• The grill plate of the Chefman Indoor Air Fryer + Grill leaves grill marks on the underside of food and heats up to 500°F. This shows that the ribs diffuse hot air along the plate to heat up the ribs:             <ul style="list-style-type: none"> <li>○ Chefman Indoor Air Fryer + Grill product website (Available at: <a href="https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ">https://chefman.com/products/rj38-afg-7tp-v2?srsltid=AfmBOoqZtjnGGJe2q60MILCNur8NPBLZsxlg-KKyc5sDhyUz50WkOWjQ</a>) (“BRING THE BBQ INSIDE!: Virtually smokeless indoor grill features <b>heavy-duty aluminum grill plate for great grill marks</b>. Heats up to 500°F with one-touch presets for perfectly cooked chicken, meat, and fish and a flip indicator so you can multitask while your food cooks.”) (emphasis added).</li> <li>○ Ex. G at 19 (“Grill Plate: heavy-duty die-cast aluminum for great grill marks”)</li> </ul> </li> <li>• The curved first, second, and third diffuser ribs of the grill plate are shown below:</li> </ul>

**U.S. Patent No.  
11,766,152**

**Evidence of Infringement: Chefman Indoor Air Fryer + Grill**



U.S. Patent No.  
11,766,152

Evidence of Infringement: Chefman Indoor Air Fryer + Grill



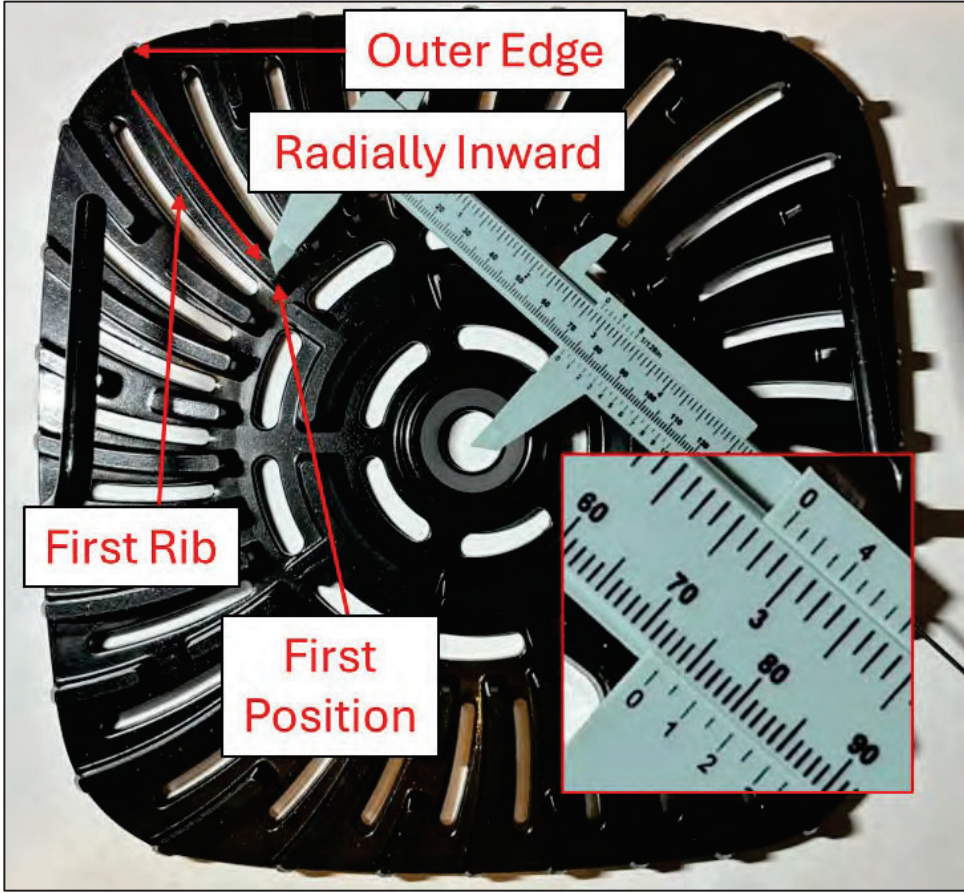


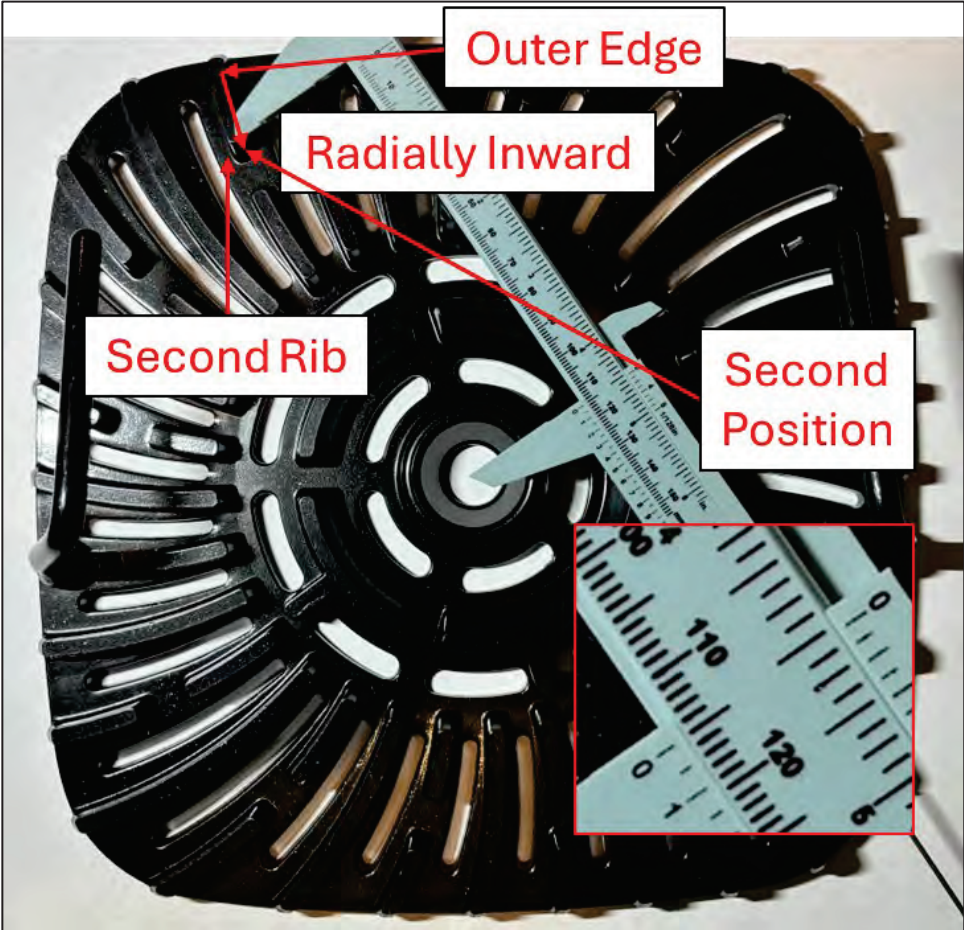
<p>U.S. Patent No. 11,766,152</p>	<p>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</p>
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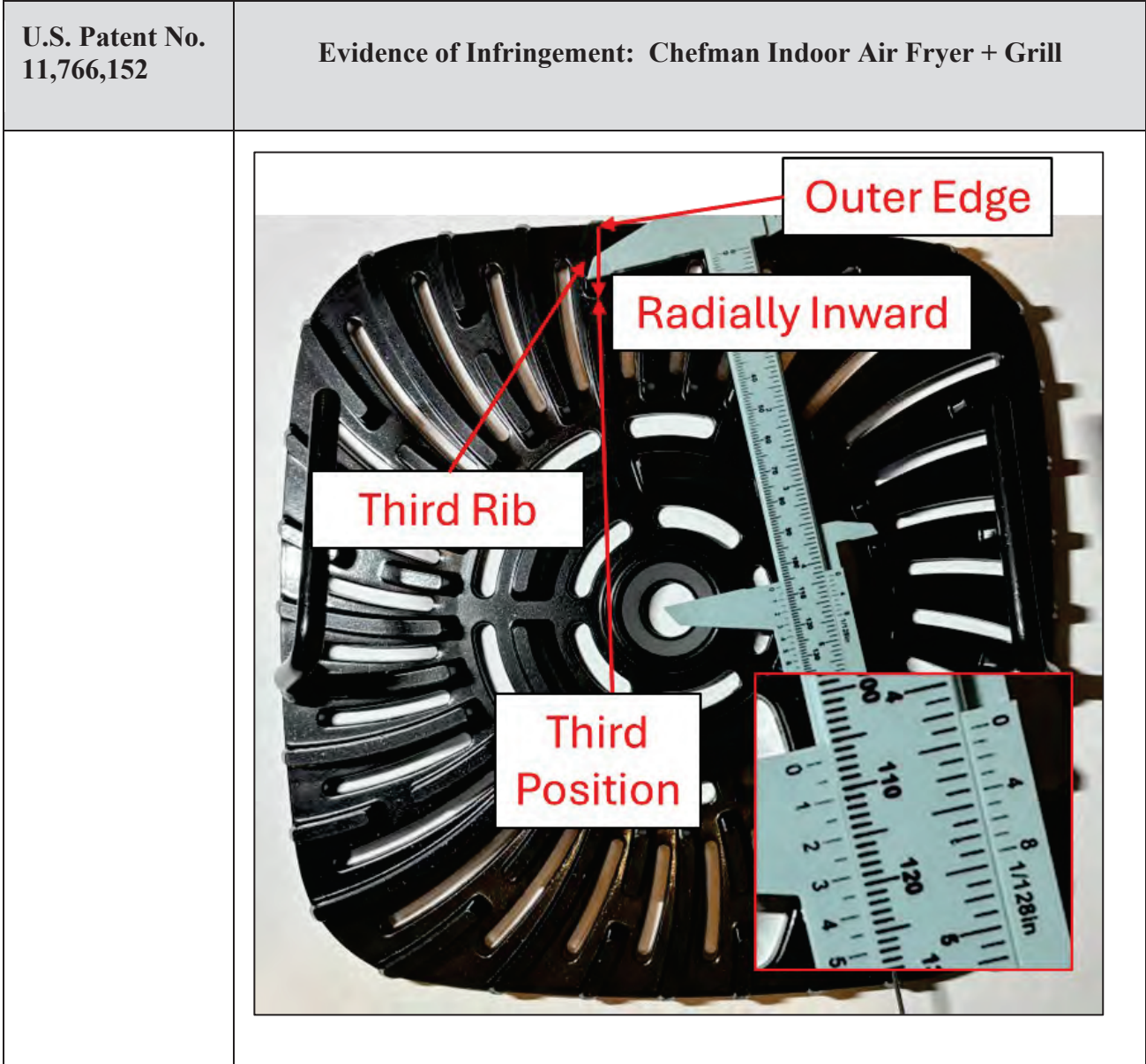


Finally, the first ribs of the Chefman Indoor Air Fryer + Grill cooking system extend radially inward between the outer edge to a first radial position on the support surface, the second ribs extend radially inward between the outer edge to a second radial position, and the third ribs extend radially inward between the outer edge to a third radial position, with the first, second, and third radial positions being different from one another.

As shown in the image of the Chefman Indoor Air Fryer + Grill below, the first ribs extend radially inward between the outer edge to a first radial position 73mm from the inner radius:

<p>U.S. Patent No. 11,766,152</p>	<p>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</p>
	 <p>As shown in the image of the Chefman Indoor Air Fryer + Grill below, the second ribs extend radially inward between the outer edge to a second radial position 115mm from the inner radius:</p>

<p>U.S. Patent No. 11,766,152</p>	<p>Evidence of Infringement: Chefman Indoor Air Fryer + Grill</p>
	 <p>As shown in the image of the Chefman Indoor Air Fryer + Grill below, the third ribs extend radially inward between the outer edge to a third radial position 109mm from the inner radius:</p>



68. On information and belief, Chefman has benefited from its infringement of the '152 patent. Chefman's use of the '152 patent has made its Electric Indoor Air Fryer + Grill more effective and better able to uniformly and evenly heat food.

69. SharkNinja has sustained damages as a direct and proximate result of Chefman's infringement of the '152 patent. Chefman has used the invention of the '152 patent to directly compete with SharkNinja and its Ninja® Indoor Grill & Air Fryers, including Ninja® Foodi® XL

6-in-1 Indoor Grill & Air Fryer (DG500 Series), Ninja® Foodi® 6-in-1 Indoor Grill & Air Fryer (EG200 Series), Ninja® Foodi® 5-in-1 Indoor Grill & Air Fryer (AG300 Series), Ninja® Foodi® 5-in-1 Indoor Grill & Air Fryer with Integrated Smart Probe (AG400 Series), Ninja® Foodi® XL 6-in-1 Indoor Grill & Air Fryer (BG500 Series), and Ninja® Foodi® 4-in-1 Indoor Grill & Air Fryer (FG500 Series). Chefman's infringement of the '152 patent has caused irreparable harm to SharkNinja and will continue to do so unless enjoined. As a result, SharkNinja is entitled to injunctive relief pursuant to 35 U.S.C. § 283. SharkNinja also is entitled to recover damages for Chefman's infringement under 35 U.S.C. § 284. The amount of damages will be proven at trial.

70. Chefman was put on notice of its infringement of the '152 patent at least as early as August 29, 2024, when it received the Notice Letter from SharkNinja regarding its infringement of the '152 patent.

71. Chefman was further put on notice of its infringement of the '152 patent at least as early as the filing of the Complaint in this action.

72. Chefman's continued infringement of the '152 patent after it has received notice of the '152 patent and its infringement of the patent is intentional, knowing, and willful.

#### **VI. COUNT III: INFRINGEMENT OF THE '654 PATENT**

73. SharkNinja incorporates by reference and realleges the allegations in paragraphs 1–72.

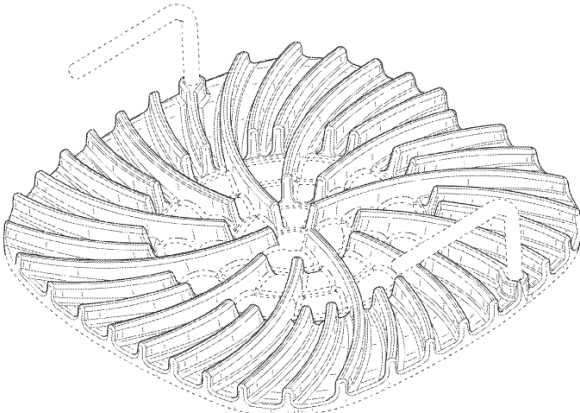

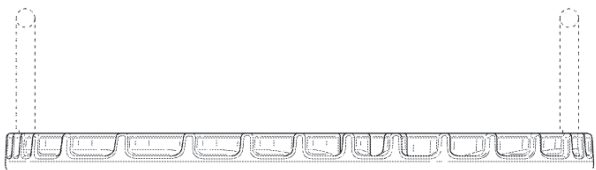
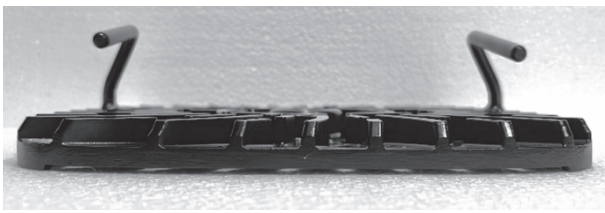
74. U.S. Patent No. D918,654 (Exhibit C), entitled "Grill Plate," was duly and properly issued by the United States Patent and Trademark Office ("USPTO") on May 11, 2021.

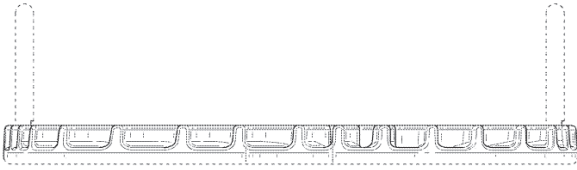
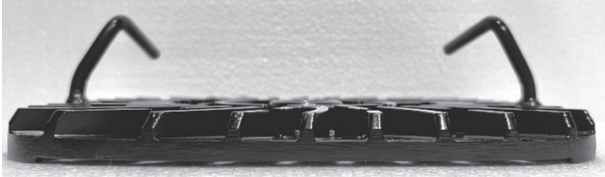
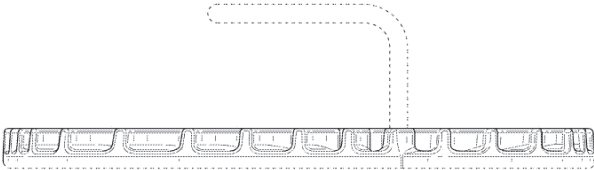
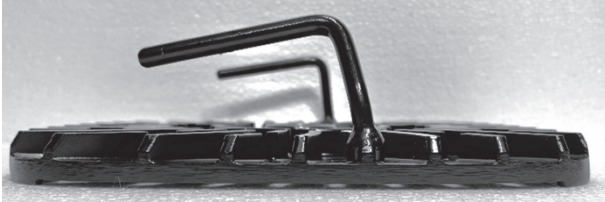
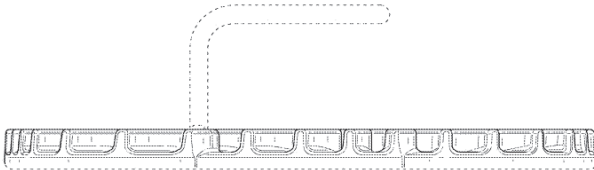
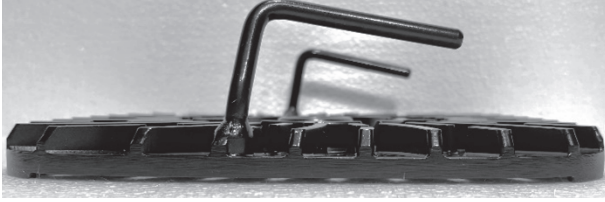


75. SharkNinja owns all rights, title, and interest in the '654 patent.

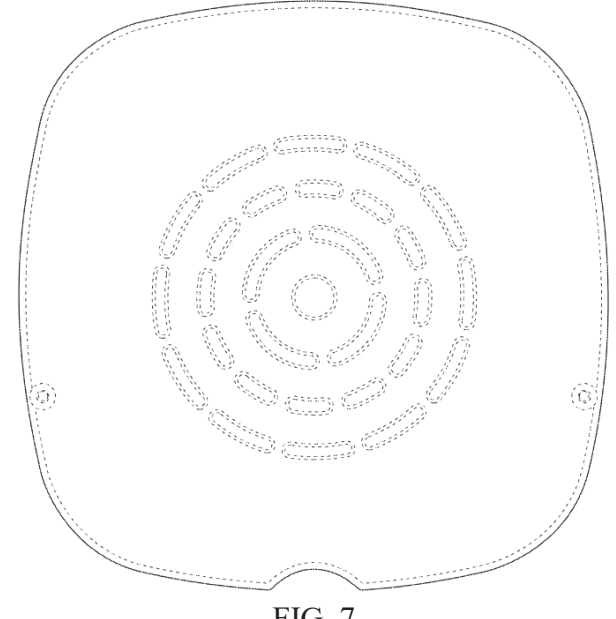

76. The application for the '654 patent was filed on June 6, 2019.

77. Chefman has infringed, and continues to infringe, the claim of the '654 patent, in violation of 35 U.S.C. § 271 by, among other things, making, using, offering to sell, and/or selling within the United States, supplying or causing to be supplied in or from the United States, and/or importing into the United States, without authority or license, the Chefman Indoor Air Fryer + Grill product.

78. The claim chart below details examples of Chefman's infringement, using the Chefman Electric Indoor Air Fryer + Grill, 5-in-1, Removable Integrated Probe Thermometer version of the Chefman Electric Indoor Air Fryer + Grill.

U.S. Patent No. D918,654	Evidence of Infringement: Chefman Indoor Air Fryer + Grill
 <p data-bbox="462 1354 544 1386">FIG. 1</p>	
 <p data-bbox="462 1648 544 1680">FIG. 2</p>	

U.S. Patent No. D918,654	Evidence of Infringement: Chefman Indoor Air Fryer + Grill
 <p data-bbox="462 485 553 516">FIG. 3</p>	
 <p data-bbox="462 783 553 814">FIG. 4</p>	
 <p data-bbox="462 1098 553 1129">FIG. 5</p>	
	

U.S. Patent No. D918,654	Evidence of Infringement: Chefman Indoor Air Fryer + Grill
FIG. 6	
	
FIG. 7	

79. On information and belief, Chefman has benefited from its infringement of the '654 patent. Chefman's use of the design of '654 patent has enhanced the ornamental appearance of its Electric Indoor Air Fryer + Grill product.

80. SharkNinja has sustained damages as a direct and proximate result of Chefman's infringement of the '654 patent. Chefman has used the invention of the '654 patent to directly compete with SharkNinja and its Ninja® Foodi® 5-in-1 Indoor Grill & Air Fryer (AG300 Series) and Ninja® Foodi® 5-in-1 Indoor Grill & Air Fryer with Integrated Smart Probe (AG400 Series). Chefman's infringement of the '654 patent has caused irreparable harm to SharkNinja and will continue to do so unless enjoined. As a result, SharkNinja is entitled to injunctive relief pursuant to 35 U.S.C. § 283. SharkNinja also is entitled to recover damages for Chefman's infringement under 35 U.S.C. §§ 284 and 289, including an award of any and all profits received or derived by Chefman from the manufacture, marketing, sale, offering for sale and/or distribution of products



or services bearing or using any copy or colorable limitation of the '654 patent. The amount of damages will be proven at trial.

81. Chefman was put on notice of its infringement of the '654 patent at least as early as the filing of the Complaint in this action.

82. Chefman's continued infringement of the '654 patent after it has received notice of the '654 patent and its infringement of the patent is intentional, knowing, and willful.

#### **VII. COUNT IV: INFRINGEMENT OF THE '026 PATENT**

83. SharkNinja incorporates by reference and realleges the allegations in paragraphs 1-82.

84. U.S. Patent No. 11,389,026 (Exhibit D), entitled "Cooking Device and Components Thereof," was duly and properly issued by the United States Patent and Trademark Office ("USPTO") on July 19, 2022.

85. SharkNinja owns all rights, title, and interest in the '026 patent.

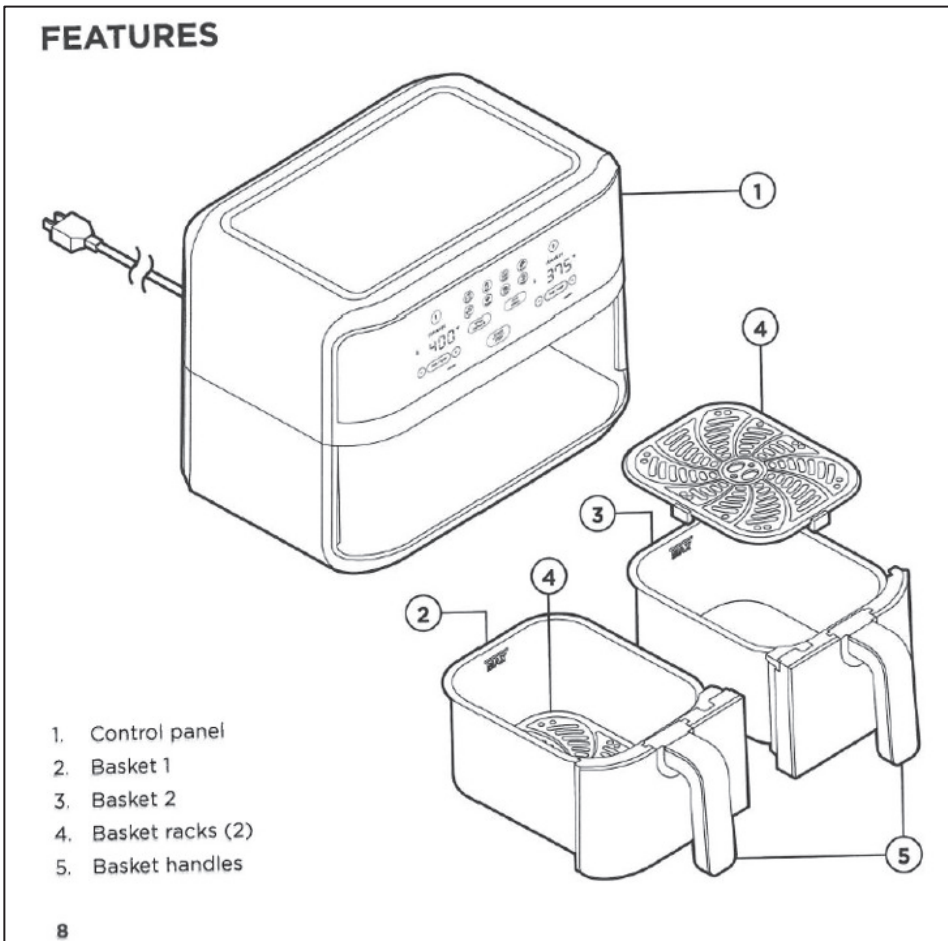
86. The application for the '026 patent was filed on March 31, 2021 and claims priority to an application filed on July 15, 2019.

87. Chefman has infringed, and continues to infringe, one or more claims of the '026 patent, including at least claim 1, in violation of 35 U.S.C. § 271 by, among other things, making, using, offering to sell, and/or selling within the United States, supplying or causing to be supplied in or from the United States, and/or importing into the United States, without authority or license, the Chefman Dual Air Fryer product.

88. The claim chart below details examples of Chefman's infringement, using the Chefman TurboFry® Touch Dual Air Fryer version of the Chefman Dual Air Fryer.


U.S. Patent No. 11,389,026	Evidence of Infringement: Chefman Dual Air Fryer
<p>1[pre]</p> <p>1. A cooking system comprising:</p>	<p>The Chefman Dual Air Fryer is a cooking system.</p> <p>For example, the Chefman Dual Air Fryer is a system that cooks foods such as “Fries, chicken, fish, bacon, hamburgers, steak, vegetables, [and] shrimp” using time and temperature controls or one of eight “Preset Function[s]:”</p> <ul style="list-style-type: none"> <li>• Chefman Website, Double Basket Air Fryer (9-Qt.) (Available at: <a href="https://chefman.com/products/rj38-sqpf-45tdb?srsId=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO">https://chefman.com/products/rj38-sqpf-45tdb?srsId=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO</a>) (“Introducing the Chefman TurboFry Touch Dual Air Fryer, your key to enjoying double the delicious, crispy <b>meals!</b> With two spacious 4.5-quart baskets, you can effortlessly air <b>fry meals</b> for the whole family. <b>Prepare two different foods</b> with different time and temperature settings using the independent touchscreen control panels; <b>air fry the main course</b> in one basket, and the side in the other! Enjoy crispy <b>chicken, fish, steak, and more</b> with <b>eight built-in cooking presets</b> and an adjustable temperature range of 200–400°F. A convenient LED reminder alerts you to shake halfway through <b>cooking</b> time, and the Sync Finish button ensures both baskets finish <b>cooking</b> simultaneously. Cleanup is a breeze with dishwasher-safe accessories and easy-to-clean nonstick baskets. Make <b>mealtimes</b> easier with this sleek and versatile <b>air fryer!</b>”) (emphasis added):</li> </ul>

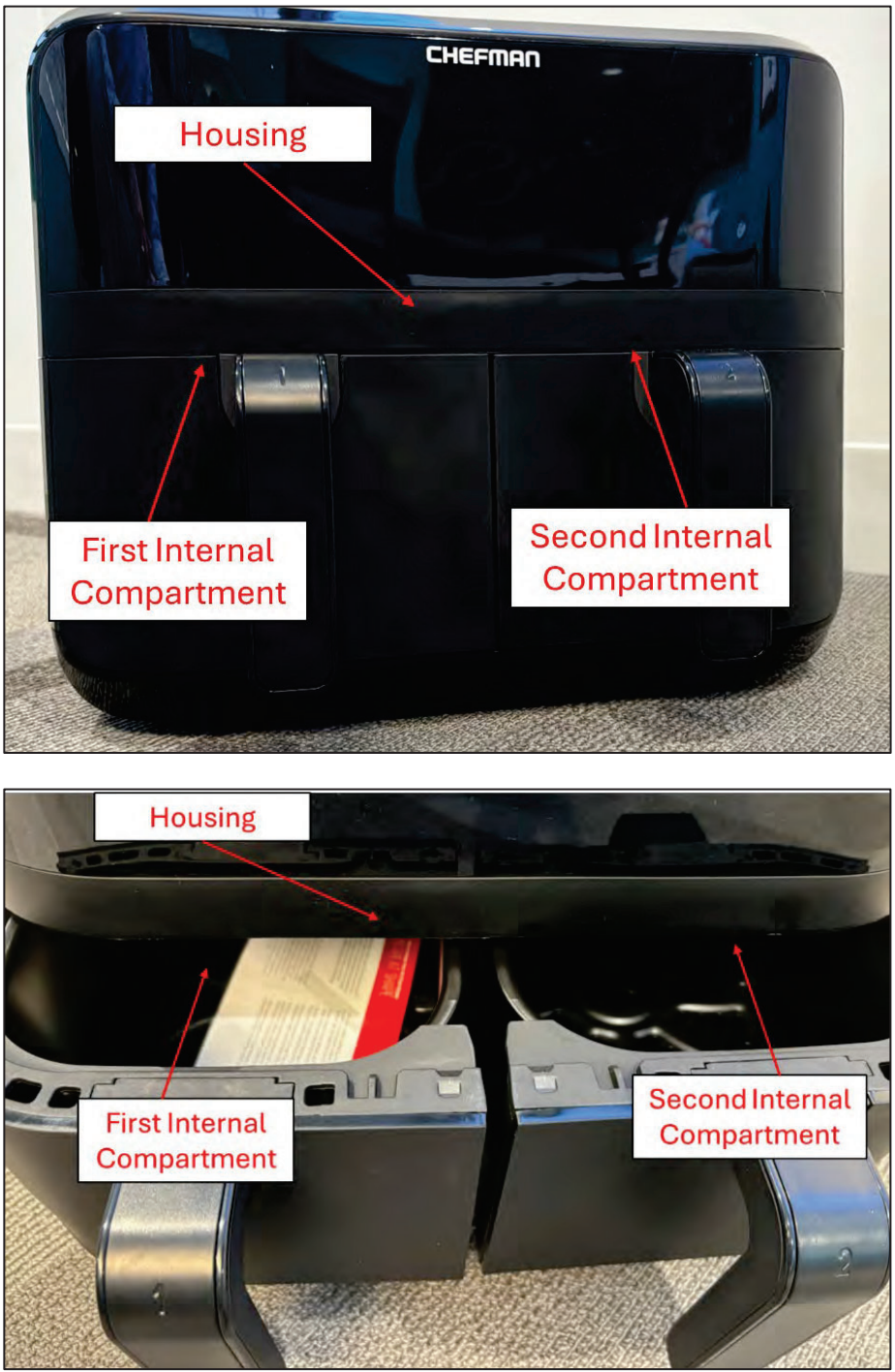
<p><b>U.S. Patent No. 11,389,026</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	<div data-bbox="446 357 1364 1123"></div> <p data-bbox="446 1144 1364 1270"><b>Cook two foods at once with different time and temperature settings.</b></p> <ul data-bbox="446 1312 1421 1396" style="list-style-type: none"><li>• Chefman TurboFry® Touch Dual Air Fryer User Guide (attached hereto as Exhibit H), at 9:</li></ul>

U.S. Patent No. 11,389,026	Evidence of Infringement: Chefman Dual Air Fryer
	<p><b>FEATURES</b></p>  <p>1. Control panel 2. Basket 1 3. Basket 2 4. Basket racks (2) 5. Basket handles</p> <p>8</p> <ul style="list-style-type: none"><li>• Ex. H at 10 (showing control buttons “to increase or decrease time and temperature”):</li></ul>

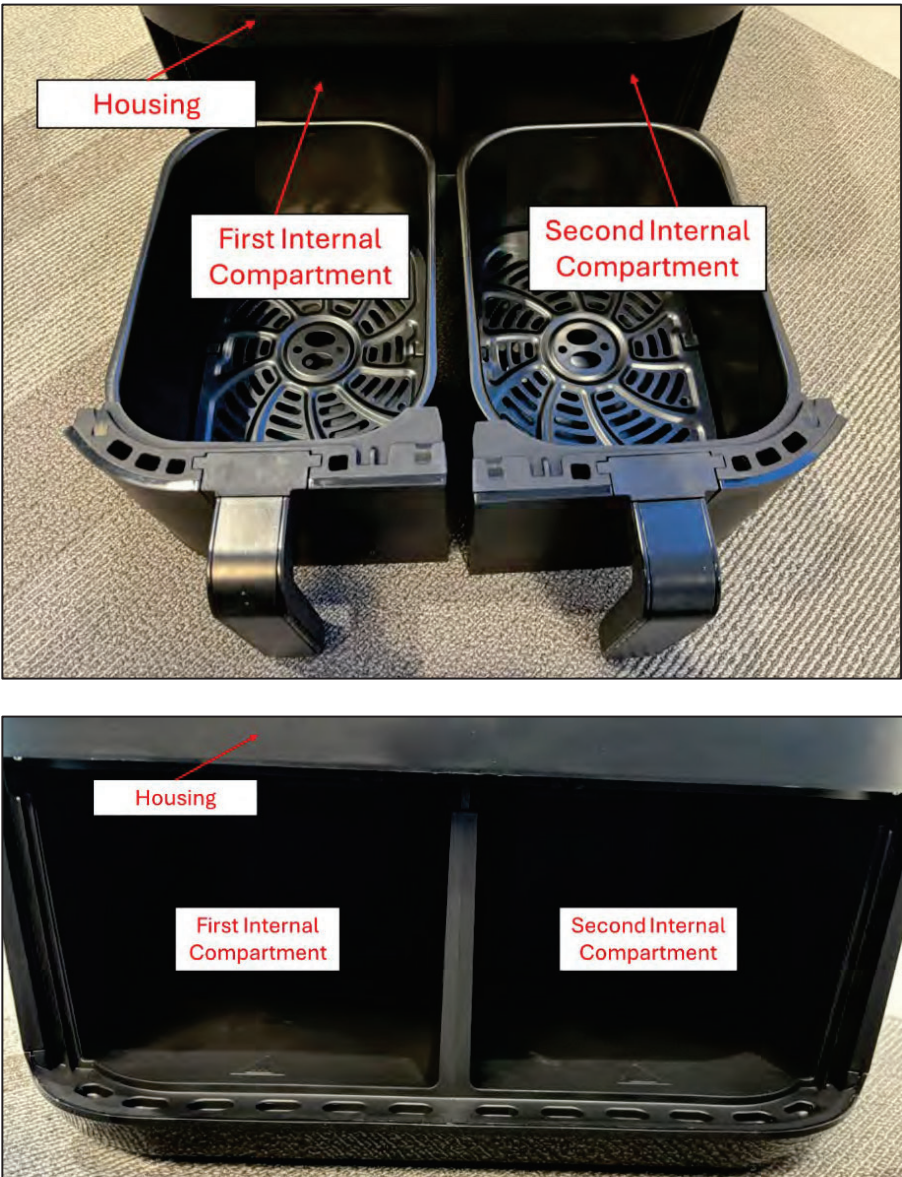
<p><b>U.S. Patent No. 11,389,026</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>											
	<div style="border: 1px solid black; padding: 10px;"> <p style="text-align: center; margin: 0;"><b>CONTROL PANEL</b></p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; vertical-align: top; padding: 5px;"> <p><b>SHAKE Lights</b> Illuminate midway through cooking as a reminder to shake basket.</p> </td> <td style="width: 25%; vertical-align: top; padding: 5px;"> <p><b>START/STOP Button</b> Starts and stops the cooking cycle for the basket number that's illuminated in blue, or for both baskets if the SYNC BASKETS button is illuminated.</p> </td> <td style="width: 25%; vertical-align: top; padding: 5px;"> <p><b>Cooking Preset Buttons</b> Automatically set time and temperature for popular foods.</p> </td> <td style="width: 25%; vertical-align: top; padding: 5px;"> <p><b>Time/Temp Displays</b> Toggle between time and temperature for each basket.</p> </td> </tr> </table> <table style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <td style="width: 25%; vertical-align: top; padding: 5px;"> <p><b>Plus (+) and Minus (-) Buttons</b> Use to increase or decrease time and temperature. Press and hold both on left side to toggle between °F and °C. Press on right side to turn sound off and on.</p> </td> <td style="width: 25%; vertical-align: top; padding: 5px;"> <p><b>Running Lights</b> Illuminate when basket is actively cooking.</p> </td> <td style="width: 25%; vertical-align: top; padding: 5px;"> <p><b>SYNC BASKETS Button</b> Programs both baskets to cook at the same time and temperature.</p> </td> <td style="width: 25%; vertical-align: top; padding: 5px;"> <p><b>SYNC FINISH Button</b> Programs baskets with different cooking times and/or temperatures to finish at the same time.</p> </td> </tr> <tr> <td colspan="2"></td> <td style="width: 25%; vertical-align: top; padding: 5px;"> <p><b>TIME/TEMP Buttons</b> Select time or temperature to set for each basket. Time adjusts by 1 minute and temperature by 5°.</p> </td> </tr> </table> <p style="text-align: right; margin-top: 10px;">9</p> </div>	<p><b>SHAKE Lights</b> Illuminate midway through cooking as a reminder to shake basket.</p>	<p><b>START/STOP Button</b> Starts and stops the cooking cycle for the basket number that's illuminated in blue, or for both baskets if the SYNC BASKETS button is illuminated.</p>	<p><b>Cooking Preset Buttons</b> Automatically set time and temperature for popular foods.</p>	<p><b>Time/Temp Displays</b> Toggle between time and temperature for each basket.</p>	<p><b>Plus (+) and Minus (-) Buttons</b> Use to increase or decrease time and temperature. Press and hold both on left side to toggle between °F and °C. Press on right side to turn sound off and on.</p>	<p><b>Running Lights</b> Illuminate when basket is actively cooking.</p>	<p><b>SYNC BASKETS Button</b> Programs both baskets to cook at the same time and temperature.</p>	<p><b>SYNC FINISH Button</b> Programs baskets with different cooking times and/or temperatures to finish at the same time.</p>			<p><b>TIME/TEMP Buttons</b> Select time or temperature to set for each basket. Time adjusts by 1 minute and temperature by 5°.</p>
<p><b>SHAKE Lights</b> Illuminate midway through cooking as a reminder to shake basket.</p>	<p><b>START/STOP Button</b> Starts and stops the cooking cycle for the basket number that's illuminated in blue, or for both baskets if the SYNC BASKETS button is illuminated.</p>	<p><b>Cooking Preset Buttons</b> Automatically set time and temperature for popular foods.</p>	<p><b>Time/Temp Displays</b> Toggle between time and temperature for each basket.</p>									
<p><b>Plus (+) and Minus (-) Buttons</b> Use to increase or decrease time and temperature. Press and hold both on left side to toggle between °F and °C. Press on right side to turn sound off and on.</p>	<p><b>Running Lights</b> Illuminate when basket is actively cooking.</p>	<p><b>SYNC BASKETS Button</b> Programs both baskets to cook at the same time and temperature.</p>	<p><b>SYNC FINISH Button</b> Programs baskets with different cooking times and/or temperatures to finish at the same time.</p>									
		<p><b>TIME/TEMP Buttons</b> Select time or temperature to set for each basket. Time adjusts by 1 minute and temperature by 5°.</p>										
	<ul style="list-style-type: none"> <li>• Ex. H at 11:</li> </ul>											


<p><b>U.S. Patent No. 11,389,026</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>																																				
	<div style="border: 1px solid black; padding: 10px;"> <p style="text-align: center;"><b>OPERATING INSTRUCTIONS</b></p> <p style="text-align: center;"><b>PRESET FUNCTION CHART</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #333; color: white;"> <th style="text-align: left;">FOOD</th> <th style="text-align: left;">Default Time</th> <th style="text-align: left;">Default Temp</th> <th style="text-align: left;">Shake/Flip Reminder?</th> </tr> </thead> <tbody> <tr> <td>Fries</td> <td>20 minutes</td> <td>400°F</td> <td>Comes on halfway through cook time</td> </tr> <tr> <td>Chicken</td> <td>30 minutes</td> <td>375°F</td> <td>Comes on halfway through cook time</td> </tr> <tr> <td>Fish</td> <td>10 minutes</td> <td>350°F</td> <td>None</td> </tr> <tr> <td>Bacon</td> <td>12 minutes</td> <td>400°F</td> <td>Comes on halfway through cook time</td> </tr> <tr> <td>Burgers</td> <td>10 minutes</td> <td>350°F</td> <td>Comes on halfway through cook time</td> </tr> <tr> <td>Steak</td> <td>15 minutes</td> <td>400°F</td> <td>Comes on halfway through cook time</td> </tr> <tr> <td>Vegetables</td> <td>15 minutes</td> <td>350°F</td> <td>Comes on halfway through cook time</td> </tr> <tr> <td>Shrimp</td> <td>7 minutes</td> <td>400°F</td> <td>Comes on halfway through cook time</td> </tr> </tbody> </table> </div>	FOOD	Default Time	Default Temp	Shake/Flip Reminder?	Fries	20 minutes	400°F	Comes on halfway through cook time	Chicken	30 minutes	375°F	Comes on halfway through cook time	Fish	10 minutes	350°F	None	Bacon	12 minutes	400°F	Comes on halfway through cook time	Burgers	10 minutes	350°F	Comes on halfway through cook time	Steak	15 minutes	400°F	Comes on halfway through cook time	Vegetables	15 minutes	350°F	Comes on halfway through cook time	Shrimp	7 minutes	400°F	Comes on halfway through cook time
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<p>1[a]  a housing having a first internal compartment and a second internal compartment;</p>	<p>The Chefman Dual Air Fryer cooking system includes a housing having a first internal compartment and a second internal compartment.</p> <p>The Chefman Dual Air Fryer cooking system includes a housing with a first internal compartment (cooking basket) and a second internal compartment (cooking basket):</p> <ul style="list-style-type: none"> <li>• Chefman Website, Double Basket Air Fryer (9-Qt.) (Available at: <a href="https://chefman.com/products/rj38-sqpf-45tdb?srsId=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAEqFGVTKaqdBO">https://chefman.com/products/rj38-sqpf-45tdb?srsId=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAEqFGVTKaqdBO</a>) (annotations added):</li> </ul>																																				

<p><b>U.S. Patent No. 11,389,026</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	 <p><b>Housing</b></p> <p><b>First Internal Compartment</b></p> <p><b>Second Internal Compartment</b></p> <p><b>Cook two foods at once with different time and temperature settings.</b></p> <ul style="list-style-type: none"><li>• The images below of the Chefman Dual Air Fryer cooking system show the housing with a first internal compartment (cooking basket) and a second internal compartment (cooking basket):</li></ul>


<p><b>U.S. Patent No. 11,389,026</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	 <p>The image contains two photographs of a Chefman Dual Air Fryer. The top photograph shows the exterior of the device, which is black and has the brand name 'CHEFMAN' printed on the top front. Three red arrows point to specific parts: one to the top surface labeled 'Housing', one to the left side of the front panel labeled 'First Internal Compartment', and one to the right side of the front panel labeled 'Second Internal Compartment'. The bottom photograph shows the interior of the air fryer with the front panel removed. It shows two separate cooking baskets. Three red arrows point to the same parts as in the top photo: the top inner surface labeled 'Housing', the left basket labeled 'First Internal Compartment', and the right basket labeled 'Second Internal Compartment'.</p>

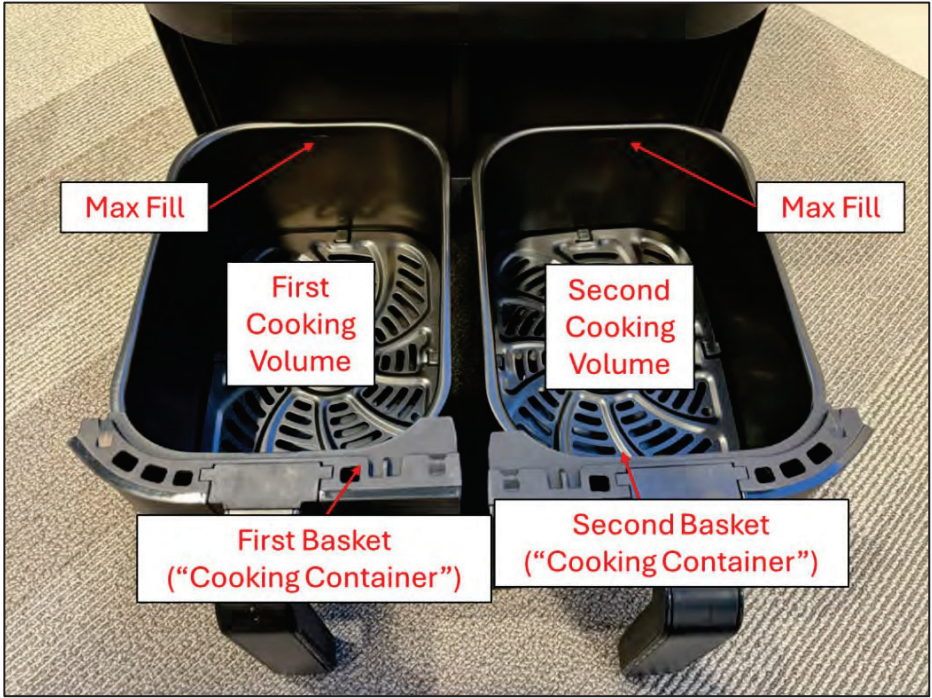



<p><b>U.S. Patent No. 11,389,026</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	
<p>1[b] a first cooking container defining a first cooking volume, said first</p>	<p>The Chefman Dual Air Fryer cooking system includes a first cooking container defining a first cooking volume, said first cooking container being removably receivable within said first internal compartment to close off an opening to said first internal compartment when inserted therein, and a second cooking container defining a second cooking volume, said second cooking container being removably receivable within said second internal compartment to close off an opening to said second internal compartment</p>

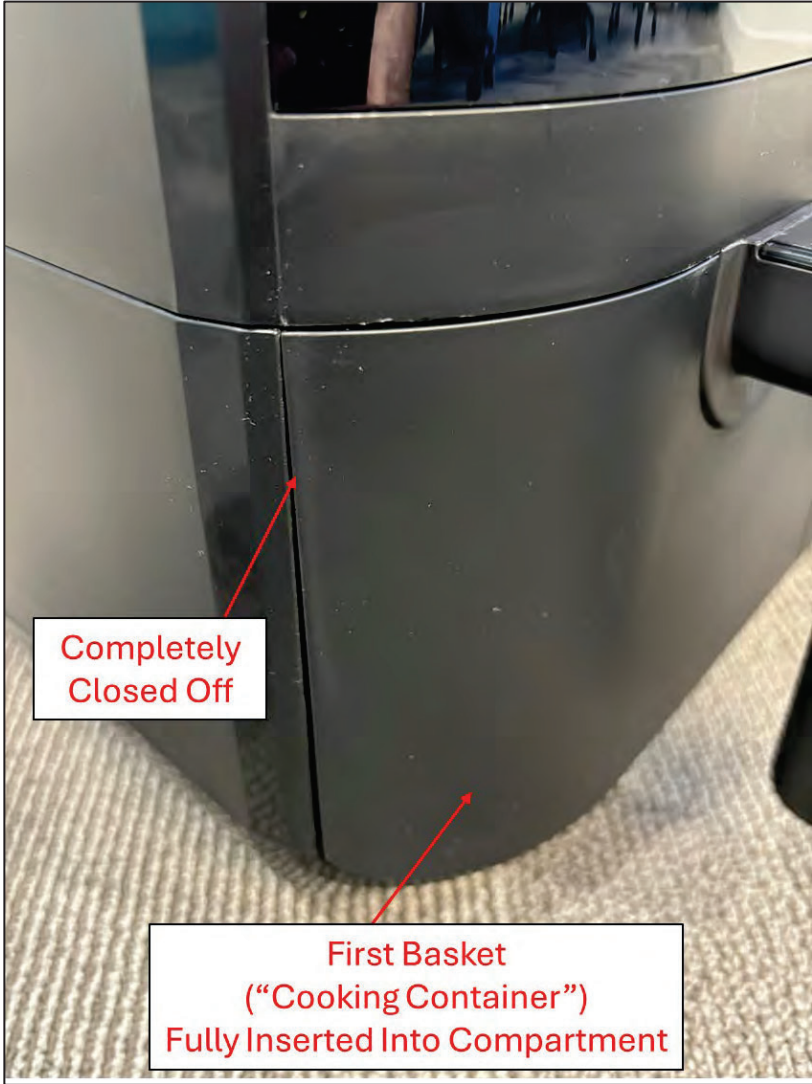
<p><b>U.S. Patent No. 11,389,026</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
<p>cooking container being removably receivable within said first internal compartment to close off an opening to said first internal compartment when inserted therein, and a second cooking container defining a second cooking volume, said second cooking container being removably receivable within said second internal compartment to close off an opening to said second internal compartment when inserted therein, the first and second cooking containers each forming a continuous outer surface with the housing when the first and second cooking containers are</p>	<p>when inserted therein, the first and second cooking containers each forming a continuous outer surface with the housing when the first and second cooking containers are inserted into the first and second internal compartments respectively.</p> <p>First, the Chefman Dual Air Fryer cooking system has two baskets (first and second “cooking container[s]”) that are removably receivable within said first internal compartment and said second internal compartment:</p> <ul style="list-style-type: none"> <li>• Ex. H at 6 (“If you choose to use oil, toss food with oil in a separate bowl, and then transfer food to the <b>removable</b> racks or baskets”) (emphasis added).</li> <li>• Chefman Website, Double Basket Air Fryer (9-Qt.) (Available at: <a href="https://chefman.com/products/rj38-sqpf-45tdb?srsltid=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO">https://chefman.com/products/rj38-sqpf-45tdb?srsltid=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO</a>) (annotations added):</li> </ul> <div data-bbox="448 1003 1276 1831" style="text-align: center;">  <p><b>Removable Baskets</b></p> <p><b>Ensures differently timed dishes finish together.</b></p> </div>

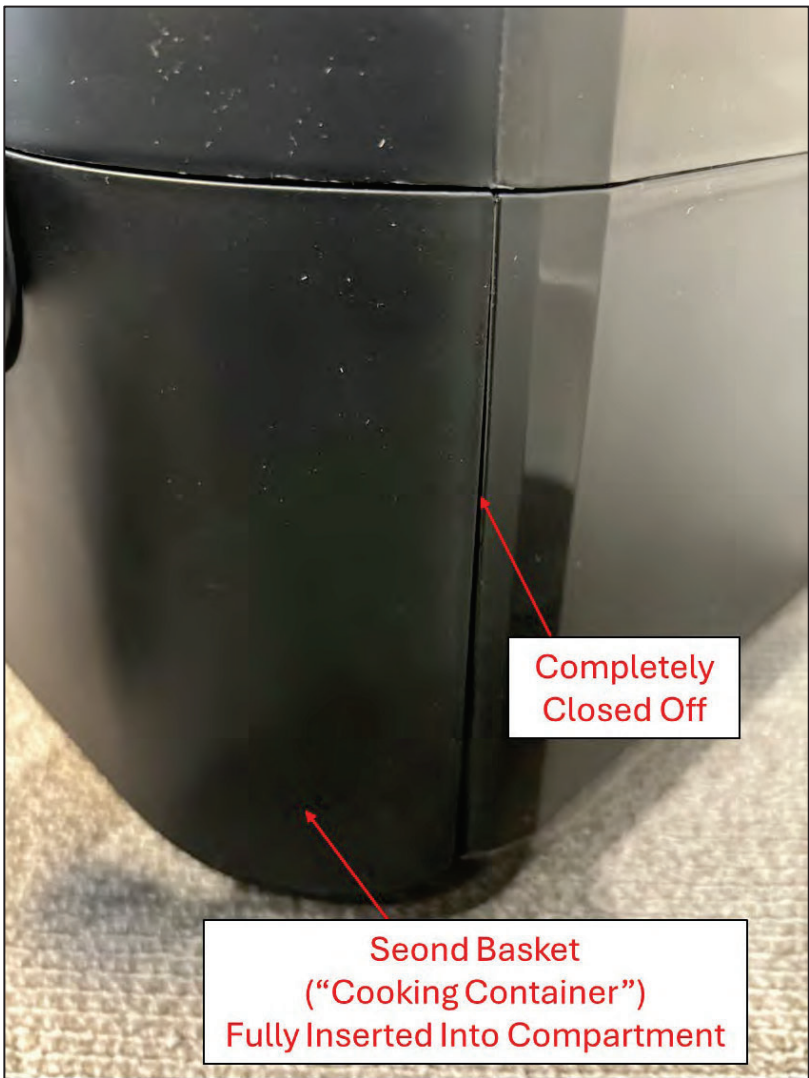
<b>U.S. Patent No. 11,389,026</b>	<b>Evidence of Infringement: Chefman Dual Air Fryer</b>
<p>inserted into the first and second internal compartments respectively;</p>	 <p>4.5-quart baskets are top-rack dishwasher safe.</p> <ul style="list-style-type: none"><li>• The removable baskets of the Chefman Dual Air Fryer are shown below:</li></ul>

<p>U.S. Patent No. 11,389,026</p>	<p>Evidence of Infringement: Chefman Dual Air Fryer</p>
	 <p>Second, the first cooking container (basket) defines a first cooking volume and the second cooking container (basket) defines a second cooking volume. Specifically, each basket contains a hollow volume to hold food that can be cooked up to a “Max line” that defines the limit of the cooking volume:</p> <ul style="list-style-type: none"><li>• Ex. H at 3 (“<b>Cooking Forward™</b> Whether this is your first Chefman® appliance or you’re already part of our family, we’re happy to be <b>cooking</b> with you! With your new TurboFry® Touch Dual Air Fryer, you can <b>air fry foods</b> to crisp perfection with little to no oil for healthier eating. With <b>two 4.5-quart baskets</b>, you can make a main dish and sides, or heat up two crispy snacks for a game-night spread. The Sync Finish feature allows <b>foods with different cook times</b> to finish at the same time.”) (emphasis added).</li><li>• The images below show the “Max line[s]” and cooking volumes of the baskets of the Chefman Dual Air Fryer system:</li></ul>

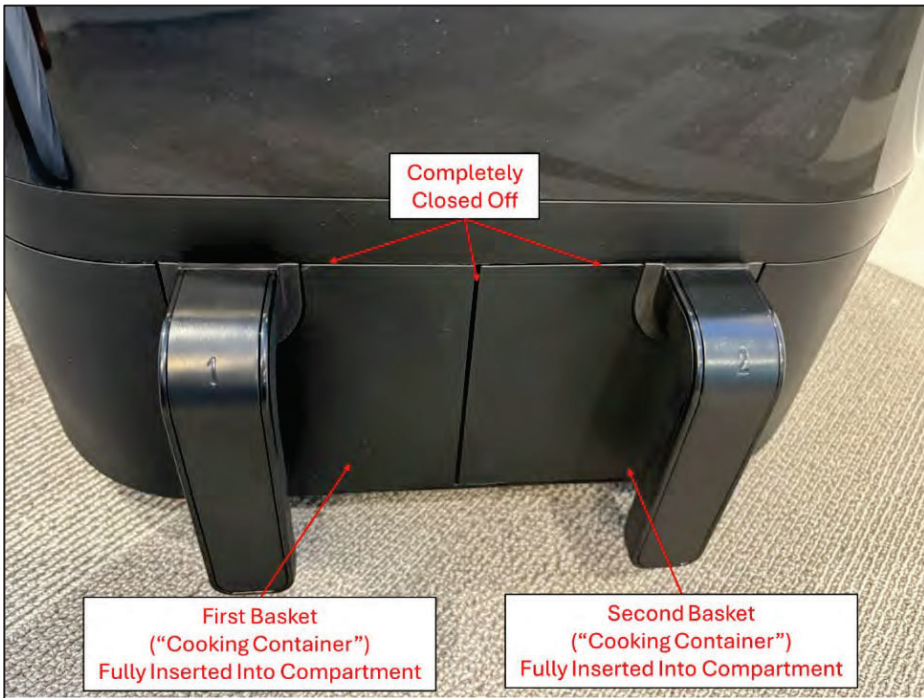
<p><b>U.S. Patent No. 11,389,026</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	 <p>The photograph shows two dual air fryer baskets side-by-side. Each basket is a rectangular metal mesh container. Red arrows point from text labels to specific parts of the baskets. The labels are: 'Max Fill' (pointing to the top rim), 'First Cooking Volume' and 'Second Cooking Volume' (pointing to the interior mesh area), and 'First Basket ("Cooking Container")' and 'Second Basket ("Cooking Container")' (pointing to the bottom edge of the baskets).</p>

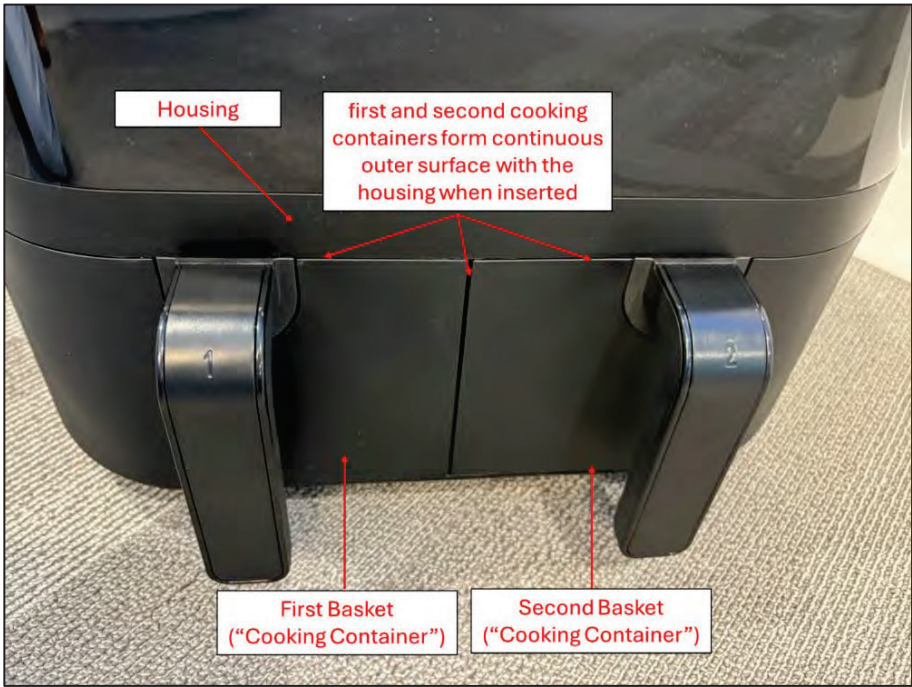
<p>U.S. Patent No. 11,389,026</p>	<p>Evidence of Infringement: Chefman Dual Air Fryer</p>
	 <p>Third, as shown in the images below of the Chefman Dual Air Fryer, the first cooking container and second cooking container (the baskets) close off an opening to the first internal compartment and second internal compartment, respectively, when inserted in the compartments:</p>

<p><b>U.S. Patent No. 11,389,026</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	 <p><b>Completely Closed Off</b></p> <p><b>First Basket ("Cooking Container") Fully Inserted Into Compartment</b></p>

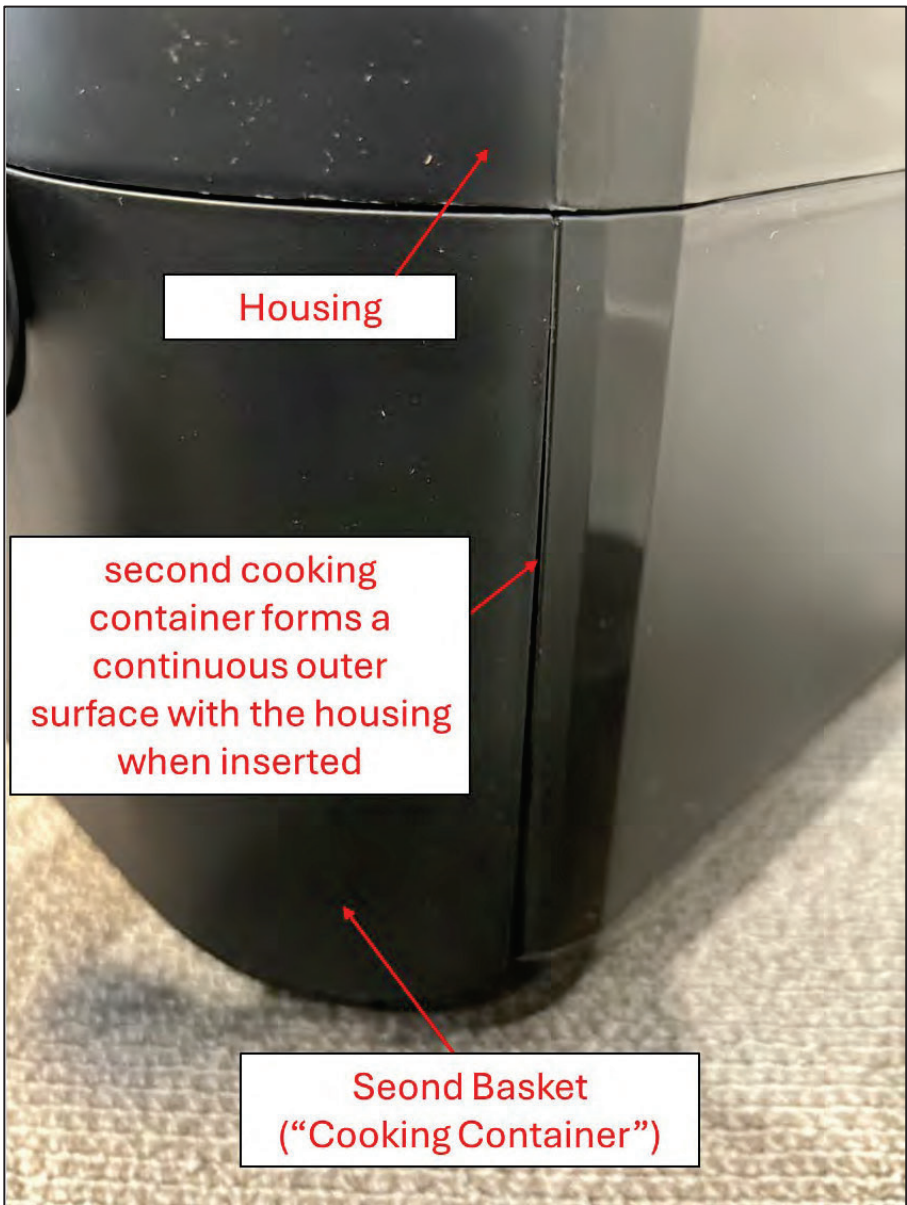
<p><b>U.S. Patent No. 11,389,026</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	 <p>Completely Closed Off</p> <p>Seond Basket ("Cooking Container") Fully Inserted Into Compartment</p>




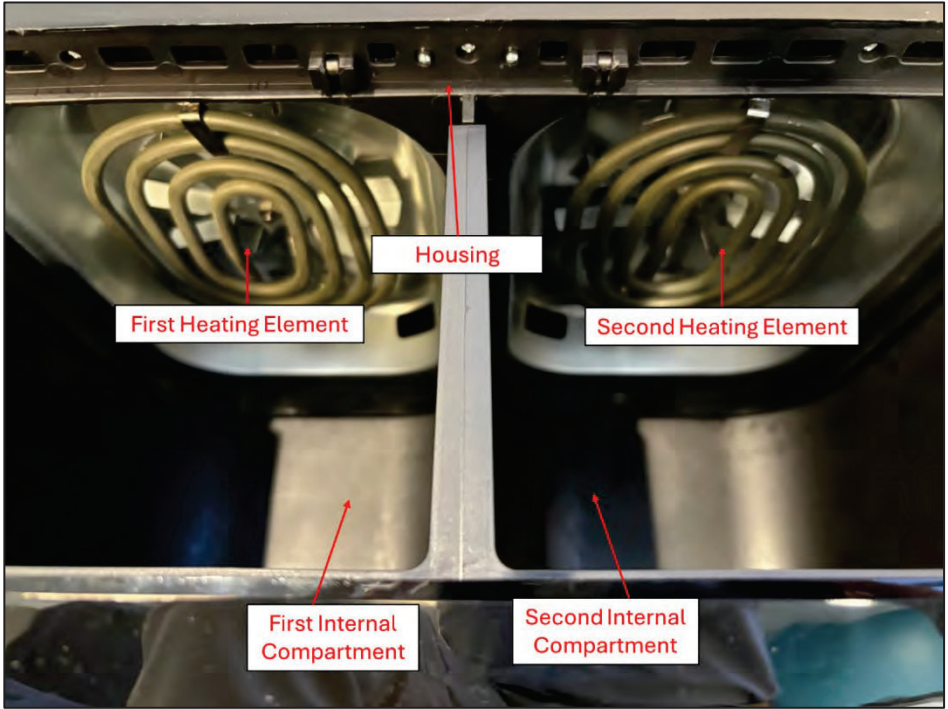
<b>U.S. Patent No. 11,389,026</b>	<b>Evidence of Infringement: Chefman Dual Air Fryer</b>
	 <p>Completely Closed Off</p> <p>1</p> <p>2</p> <p>First Basket ("Cooking Container") Fully Inserted Into Compartment</p> <p>Second Basket ("Cooking Container") Fully Inserted Into Compartment</p> <p>Fourth, the first and second cooking containers each form a continuous outer surface with the housing when the first and second cooking containers are inserted into the first and second internal compartments respectively. As shown in the images below of the Chefman Dual Air Fryer, the two baskets ("cooking containers") form a continuous outer surface when inserted into their respective first and second internal compartments:</p>

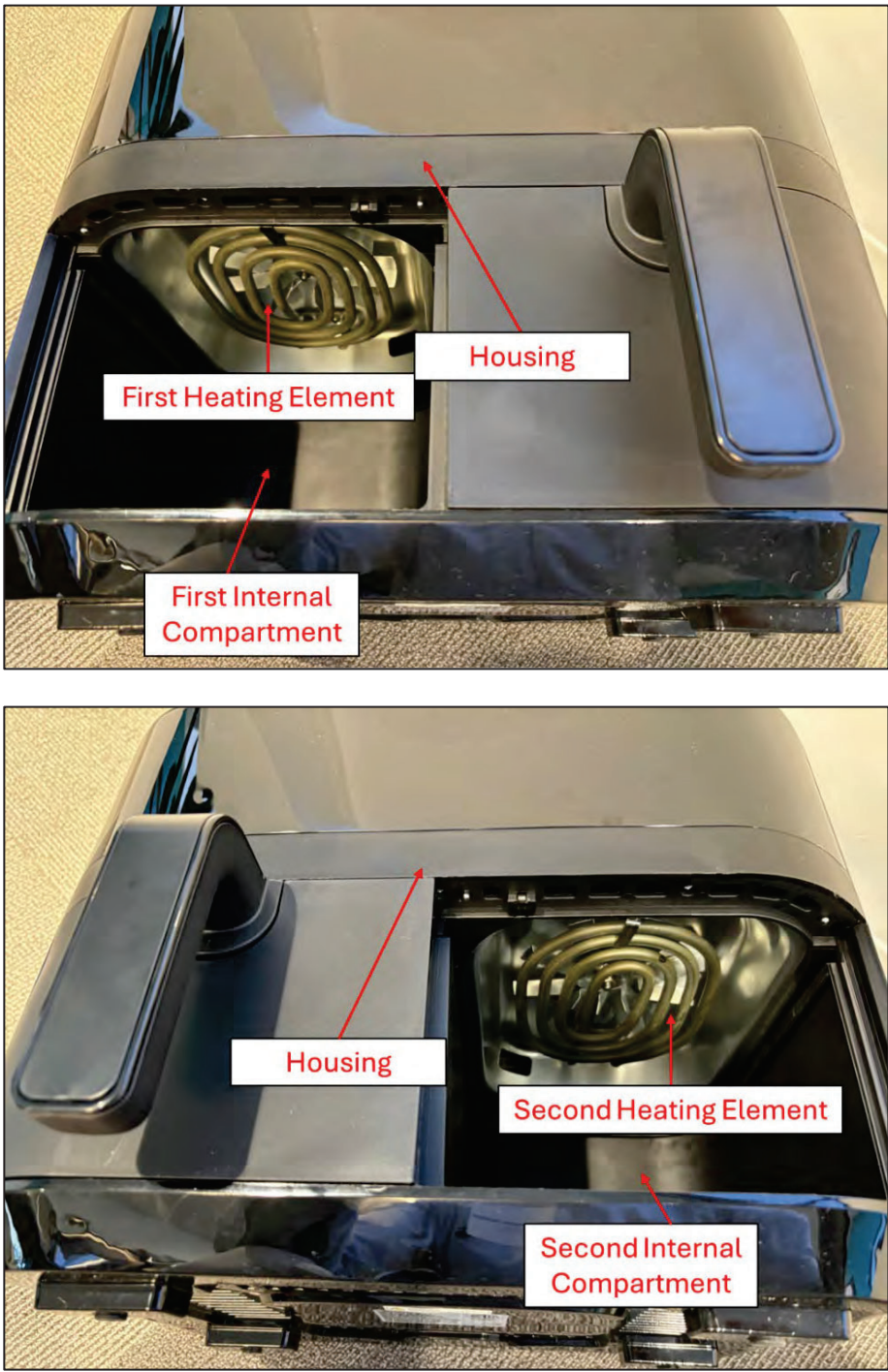
<p><b>U.S. Patent No. 11,389,026</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	 <p>The photograph shows the lower portion of a black dual air fryer. Two baskets are visible, each with a handle. Red arrows point from text labels to the housing and baskets. The labels are:</p> <ul style="list-style-type: none"><li><b>Housing</b>: Points to the upper part of the fryer's body.</li><li><b>first and second cooking containers form continuous outer surface with the housing when inserted</b>: Points to the area where the baskets meet the housing.</li><li><b>First Basket ("Cooking Container")</b>: Points to the left basket.</li><li><b>Second Basket ("Cooking Container")</b>: Points to the right basket.</li></ul>

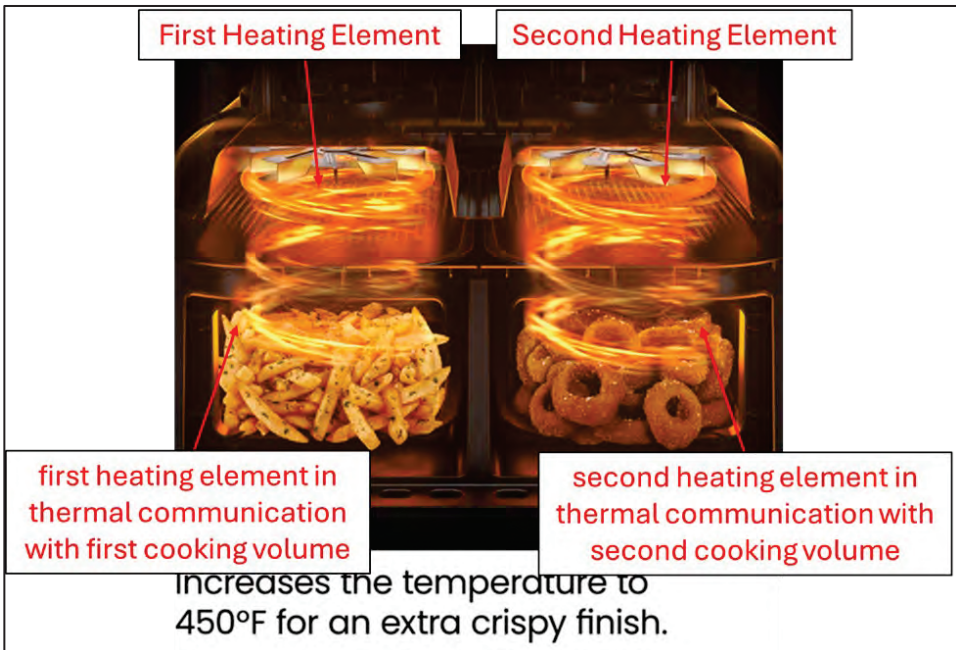


U.S. Patent No. 11,389,026	Evidence of Infringement: Chefman Dual Air Fryer
	 <ul style="list-style-type: none"><li>• Chefman Website, Double Basket Air Fryer (9-Qt.) (Available at: <a href="https://chefman.com/products/rj38-sqpf-45tdb?srsltid=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO">https://chefman.com/products/rj38-sqpf-45tdb?srsltid=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO</a>) (showing continuous outer surface when first and second cooking containers are inserted):</li></ul>

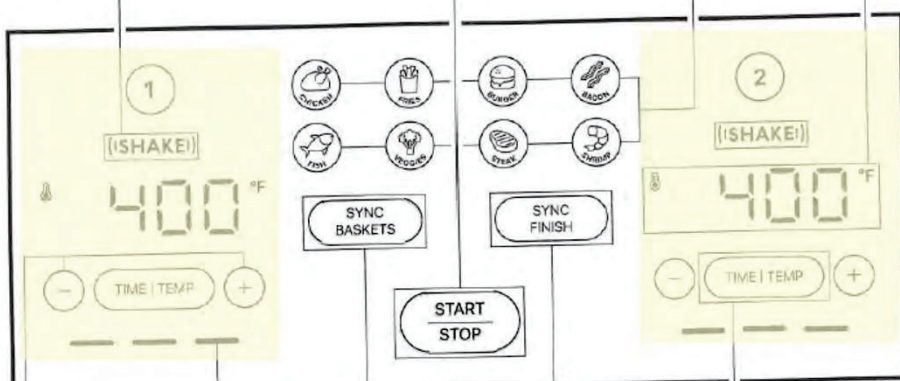
<p><b>U.S. Patent No. 11,389,026</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	
<p>1[c] a first heating element and a second heating element disposed in said housing, said first heating element being in thermal communication with said first cooking volume</p>	<p>The Chefman Dual Air Fryer cooking system includes a first heating element and a second heating element disposed in said housing, said first heating element being in thermal communication with said first cooking volume and said second heating element being in thermal communication with said second cooking volume, the first and second heating elements being independently operable to independently cook food contained within the first and second cooking containers.</p> <p>First, each of the baskets of the Chefman Dual Air Fryer cooking system has its own heating element that is directly above and heats the cooking volume of the basket.</p> <ul style="list-style-type: none"> <li>• Ex. H at 6 (“Some areas do get HOT during use, and the touch screen may get warm. Do not touch the <b>heating elements</b>. Do not place hands</li> </ul>

<p><b>U.S. Patent No. 11,389,026</b></p>	<p align="center"><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
<p>and said second heating element being in thermal communication with said second cooking volume, the first and second heating elements being independently operable to independently cook food contained within the first and second cooking containers; and</p>	<p>or other body parts near the air vents while the air fryer is in use; burns may result. Take caution when handling the hot air fryer rack and all removable parts.”) (emphasis added).</p> <ul style="list-style-type: none"> <li>The image below of the Chefman Dual Air Fryer shows first and second electric coil heaters (heating elements) that are within the housing of the Chefman Dual Air Fryer and are above the first and second internal compartments:</li> </ul>  <p>Second, the first and second heating elements are in thermal communication with said first cooking volume and second cooking volume, respectively. As the images of the Chefman Dual Air Fryer shown below illustrate, the two electric coil heaters (heating elements) heat the internal compartments into which each basket is placed. Because the baskets contain the first and second cooking volume, the first and second heating elements are in thermal communication with the first and second cooking volumes.</p>

<p><b>U.S. Patent No. 11,389,026</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	 <p>The first photograph shows the interior of the air fryer with a heating element and a compartment. The second photograph shows the opposite side of the interior with another heating element and compartment. Red arrows point from text labels to the corresponding parts in the images.</p> <ul style="list-style-type: none"><li>• Chefman Website, Double Basket Air Fryer (9-Qt.) (Available at:</li></ul>

<b>U.S. Patent No. 11,389,026</b>	<b>Evidence of Infringement: Chefman Dual Air Fryer</b>
	<p><a href="https://chefman.com/products/rj38-sqpf-45tdb?srsId=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO">https://chefman.com/products/rj38-sqpf-45tdb?srsId=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO</a> (annotations added):</p> <div data-bbox="446 499 1396 1144"><p>Increases the temperature to 450°F for an extra crispy finish.</p></div> <p>Third, the heating elements of the Chefman Dual Air Fryer are independently operable to independently cook food contained within the first and second baskets (“cooking container[s]”), respectively.</p> <ul style="list-style-type: none"><li>• For example, the control panel includes separate temperature and time controls and displays for the first and second basket and requires the user to press a “Sync Baskets” button in order to prevent the baskets from being controlled independently:<ul style="list-style-type: none"><li>○ Ex. H at 10 (annotations added):</li></ul></li></ul>

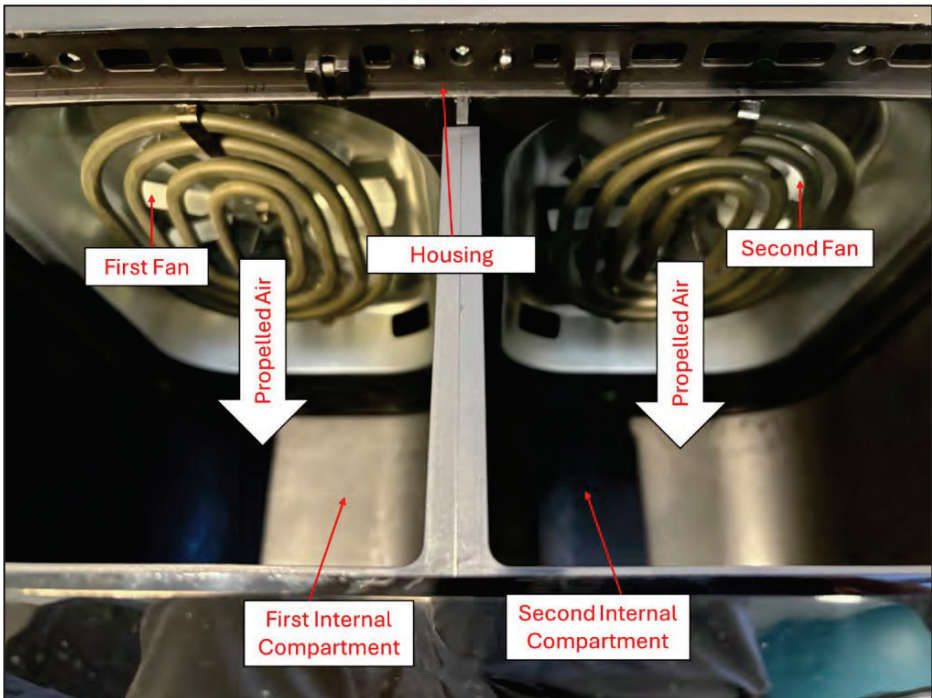


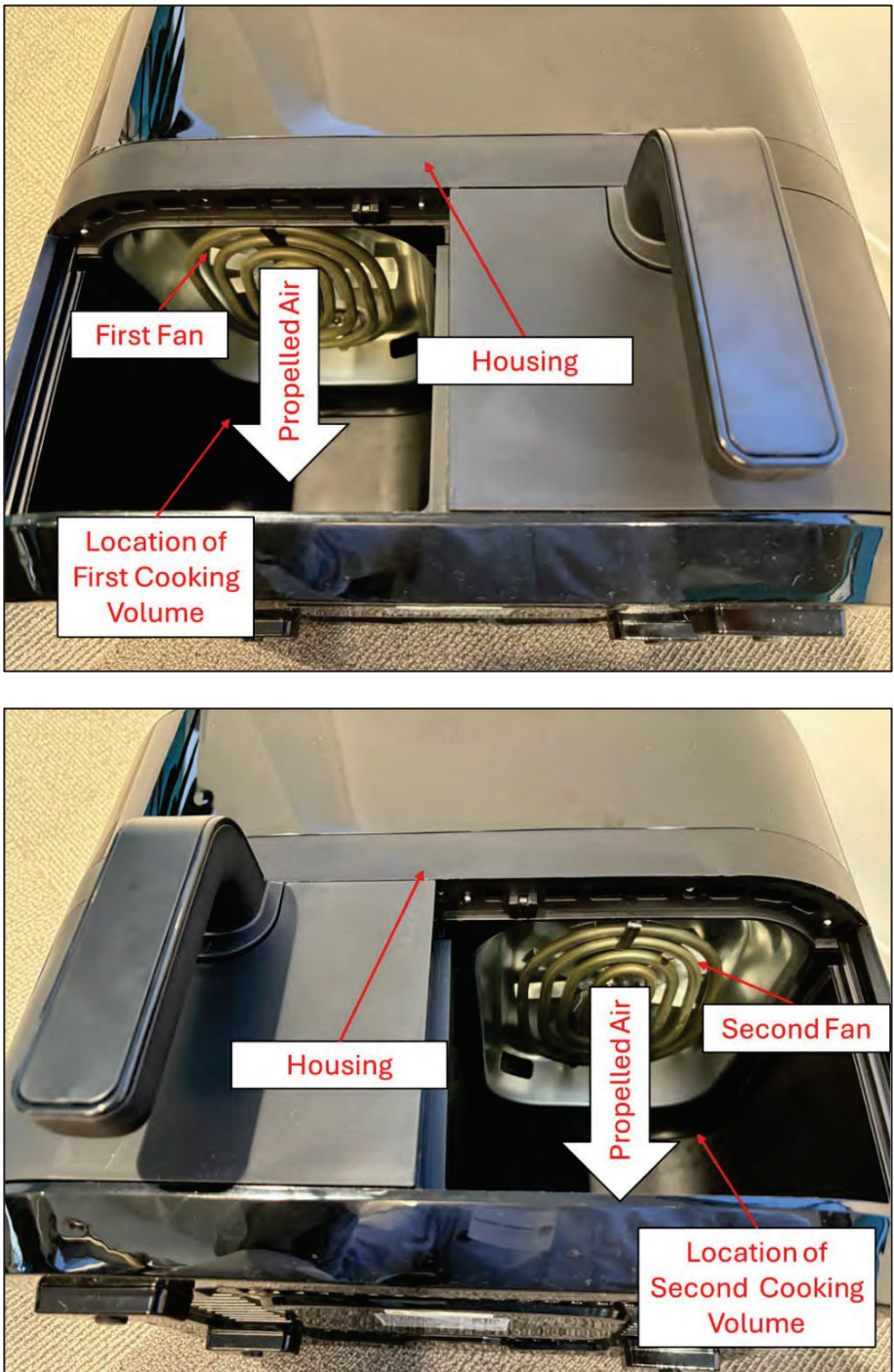
<p><b>U.S. Patent No. 11,389,026</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	<div style="border: 1px solid black; padding: 10px;"> <h3 style="text-align: center;">CONTROL PANEL</h3>  <p>The diagram shows a control panel for a dual-basket air fryer. It features two main sections, one for each basket, labeled '1' and '2'. Each section has a digital display showing '400 °F' and a '[(SHAKE)]' button. Below the displays are minus and plus buttons labeled 'TIME   TEMP'. In the center, there is a 'START STOP' button and two 'SYNC' buttons: 'SYNC BASKETS' and 'SYNC FINISH'. Above the central buttons are several preset buttons with icons for Chicken, Fish, Pork, Beef, Poultry, and Bacon. To the left of the panel, there are 'SHAKE Lights' and 'Running Lights'. To the right, there are 'Cooking Preset Buttons' and 'Time/Temp Displays'. Below the panel, there are callouts for 'Plus (+) and Minus (-) Buttons', 'SYNC BASKETS Button', 'SYNC FINISH Button', and 'TIME/TEMP Buttons'.</p> <p><b>SHAKE Lights</b> Illuminate midway through cooking as a reminder to shake basket.</p> <p><b>START/STOP Button</b> Starts and stops the cooking cycle for the basket number that's illuminated in blue, or for both baskets if the SYNC BASKETS button is illuminated.</p> <p><b>Cooking Preset Buttons</b> Automatically set time and temperature for popular foods.</p> <p><b>Time/Temp Displays</b> Toggle between time and temperature for each basket.</p> <p><b>Plus (+) and Minus (-) Buttons</b> Use to increase or decrease time and temperature. Press and hold both on left side to toggle between °F and °C. Press on right side to turn sound off and on.</p> <p><b>Running Lights</b> Illuminate when basket is actively cooking.</p> <p><b>SYNC BASKETS Button</b> Programs both baskets to cook at the same time and temperature.</p> <p><b>SYNC FINISH Button</b> Programs baskets with different cooking times and/or temperatures to finish at the same time.</p> <p><b>TIME/TEMP Buttons</b> Select time or temperature to set for each basket. Time adjusts by 1 minute and temperature by 5°.</p> <p style="text-align: right;">9</p> </div> <ul style="list-style-type: none"> <li>• The Chefman Dual Air Fryer User Guide includes instructions on how to “cook in one basket” and independently operate one heating element to cook food in the cooking volume beneath it. Independent control is the system’s “default mode,” and the system permits a user to begin cooking on the second side with different time and temperature settings.             <ul style="list-style-type: none"> <li>○ Ex. H at 13–14 (annotations added):</li> </ul> </li> </ul>

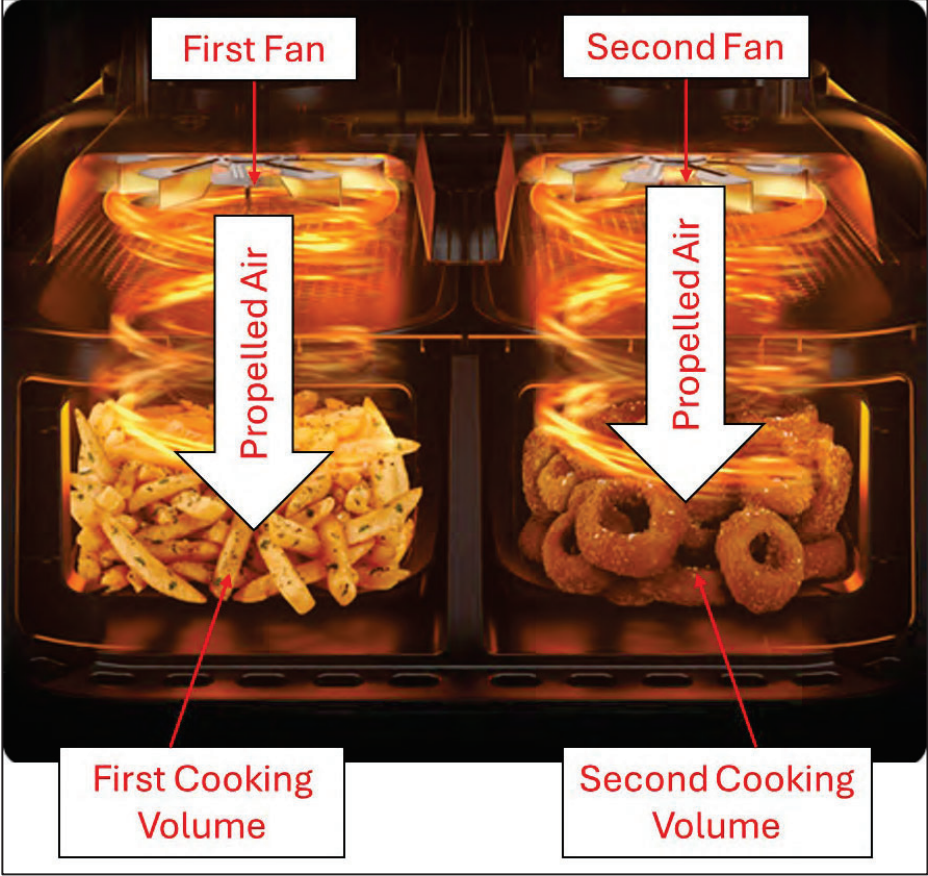
<b>U.S. Patent No. 11,389,026</b>	<b>Evidence of Infringement: Chefman Dual Air Fryer</b>
	<div data-bbox="446 357 1396 1302" style="border: 1px solid black; padding: 10px;"><p><b>HOW TO COOK IN ONE BASKET</b></p><p>Though the beauty of this air fryer is its double-basket capacity and sync functions, you can easily cook in just one basket, which is the default mode. (The other basket can be removed or left in the unit on standby.)</p><ol style="list-style-type: none"><li>1. Prepare for air fryer cooking as directed starting on p. 11.</li><li>2. <b>Set the time and temperature for basket 1:</b> To set the temperature, press the TIME/TEMP button until the temperature displays, then press the plus (+) or minus (-) sign. To set the time, press the TIME/TEMP button until the time displays, and then press the plus or minus sign. If cooking with a preset function, choose the icon that best represents the food you're cooking and press the icon. This will set the preprogrammed time and temperature. (See chart on p. 10 for details).</li><li>3. Press START.</li><li>4. During cooking, the SHAKE light on the control panel will turn on, and the air fryer will beep as a reminder to shake (or flip) food, as necessary. (See chart starting on p. 16 for more details on timing.) The light will turn off immediately when the basket is removed and will go off automatically after about 10 seconds if the basket is not pulled out. (If your food does not need to be shaken, flipped, or turned, simply ignore the warning.)</li></ol><p><b>12</b></p><ol style="list-style-type: none"><li>5. When the timer is done, the air fryer will turn off automatically. Remove the basket from the unit. Check food for doneness, then carefully transfer the food to plates or a platter and serve.</li></ol><p><b>NOTE:</b> While the unit is cooking on one side, you can begin cooking in the other basket at any time. (The Sync Baskets and Sync Finish functions will not be available, however.) Simply press the other basket's button on the display and set the time and temperature for that side. Do NOT press START. The running lights for that basket will come on to show that it's cooking.</p></div> <ul style="list-style-type: none"><li>• Chefman Website, Double Basket Air Fryer (9-Qt.) (Available at: <a href="https://chefman.com/products/rj38-sqpf-45tdb?srsId=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO">https://chefman.com/products/rj38-sqpf-45tdb?srsId=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO</a>):</li></ul>

<p><b>U.S. Patent No. 11,389,026</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	<div data-bbox="446 359 1328 1092" data-label="Image"> </div> <div data-bbox="446 1108 1058 1218" data-label="Caption"> <p><b>Independent touchscreen functions for each basket.</b></p> </div> <ul data-bbox="446 1276 1429 1822" style="list-style-type: none"> <li>• Chefman Website, Double Basket Air Fryer (9-Qt.) (Available at: <a href="https://chefman.com/products/rj38-sqpf-45tdb?srsId=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO">https://chefman.com/products/rj38-sqpf-45tdb?srsId=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO</a>) (“Introducing the Chefman TurboFry Touch Dual Air Fryer, your key to enjoying double the delicious, crispy meals! With two spacious 4.5-quart baskets, you can effortlessly air fry meals for the whole family. <b>Prepare two different foods with different time and temperature settings using the independent touchscreen control panels</b>; air fry the main course in one basket, and the side in the other! Enjoy crispy chicken, fish, steak, and more with eight built-in cooking presets and an adjustable temperature range of 200–400°F. A convenient LED reminder alerts you to shake halfway through cooking time, and the Sync Finish button ensures both baskets finish cooking simultaneously. Cleanup is a breeze with dishwasher-safe accessories and easy-to-clean nonstick baskets. Make mealtimes easier with this</li> </ul>

U.S. Patent No. 11,389,026	Evidence of Infringement: Chefman Dual Air Fryer
	sleek and versatile air fryer!”) (emphasis added).
<p>1[d] a first fan and a second fan disposed in said housing, said first fan being in fluid communication with said first cooking volume and said second fan being in fluid communication with said second cooking volume.</p>	<p>The Chefman Dual Air Fryer cooking system includes a first fan and a second fan disposed in said housing, said first fan being in fluid communication with said first cooking volume and said second fan being in fluid communication with said second cooking volume.</p> <p>The '026 patent describes air movement mechanisms that “circulate air through the internal compartment[s].” The Chefman Dual Air Fryer contains the same functionality. The Chefman Dual Air Fryer cooking system includes a fan in the housing above each electric coil heater that circulates air through the respective cooking volume underneath.</p> <ul style="list-style-type: none"> <li>• Ex. H at 12 (“The air fryer’s <b>high-speed fans</b> cook your favorite foods quickly.”) (emphasis added).</li> <li>• The image below of the Chefman Dual Air Fryer shows first and second fans in the housing above the electric coil heaters. The fans are in fluid communication with the first and second cooking volumes when they circulate air through the cooking compartments and their respective cooking volumes below:</li> </ul>

<p>U.S. Patent No. 11,389,026</p>	<p>Evidence of Infringement: Chefman Dual Air Fryer</p>
	 <p>The image shows the internal structure of a dual air fryer. It features two fans, one on the left and one on the right, each positioned above a corresponding internal compartment. The fans are connected to a central housing. Arrows labeled 'Propelled Air' point downwards from each fan into its respective compartment. Labels include 'First Fan', 'Housing', 'Second Fan', 'First Internal Compartment', and 'Second Internal Compartment'.</p> <ul style="list-style-type: none"><li>• The images below of the Chefman Dual Air Fryer show the fans above the internal compartments into which each basket is placed. The fans are in fluid communication with the respective cooking volumes contained within each basketed such that each fan propels heated air into the respective cooking volume:</li></ul>

U.S. Patent No. 11,389,026	Evidence of Infringement: Chefman Dual Air Fryer
	 <p>The top photograph shows the internal components of the air fryer. A red arrow points to a fan labeled "First Fan". A white arrow labeled "Propelled Air" points downwards from the fan. A red arrow points to the "Housing". A white box labeled "Location of First Cooking Volume" is positioned below the fan.</p> <p>The bottom photograph shows the internal components from a different angle. A red arrow points to the "Housing". A red arrow points to a fan labeled "Second Fan". A white arrow labeled "Propelled Air" points downwards from the fan. A white box labeled "Location of Second Cooking Volume" is positioned below the fan.</p> <ul style="list-style-type: none"><li>• Chefman Website, Double Basket Air Fryer (9-Qt.) (Available at: <a href="https://chefman.com/products/rj38-sqpf-">https://chefman.com/products/rj38-sqpf-</a></li></ul>

<p><b>U.S. Patent No. 11,389,026</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	<p>45tdb?srsltid=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO) (annotations added):</p> 

89. On information and belief, Chefman has benefited from its infringement of the '026 patent. Chefman's use of the '026 patent has made its Dual Air Fryer product more effective and able to heat food at two different temperatures simultaneously.

90. SharkNinja has sustained damages as a direct and proximate result of Chefman's infringement of the '026 patent. Chefman has used the invention of the '026 patent to directly compete with SharkNinja and its Ninja® Foodi® 2-Basket Air Fryer with DualZone™

Technology, including the 6-in-1 10-Qt DZ550 Series, the 6-in-1 8-Qt DZ201 Series, the 6-in-1 10-Qt DZ401 Series, the 4-in-1 8-Qt DZ100 Series, and the 5-in-1 6-Qt DZ090 Series.

Chefman's infringement of the '026 patent has caused irreparable harm to SharkNinja and will continue to do so unless enjoined. As a result, SharkNinja is entitled to injunctive relief pursuant to 35 U.S.C. § 283. SharkNinja also is entitled to recover damages for Chefman's infringement under 35 U.S.C. § 284. The amount of damages will be proven at trial.

91. Chefman was put on notice of its infringement of the '026 patent at least as early as August 29, 2024, when it received the Notice Letter from SharkNinja regarding its infringement of the '026 patent.

92. Chefman was further put on notice of its infringement of the '026 patent at least as early as the filing of the Complaint in this action.

93. Chefman's continued infringement of the '026 patent after it has received notice of the '026 patent and its infringement of the patent is intentional, knowing, and willful.

#### **VIII. COUNT V: INFRINGEMENT OF THE '377 PATENT**

94. SharkNinja incorporates by reference and realleges the allegations in paragraphs 1–93.

95. U.S. Patent No. 11,672,377 (Exhibit E), entitled "Cooking Device and Components Thereof," was duly and properly issued by the United States Patent and Trademark Office ("USPTO") on June 13, 2023.

96. SharkNinja owns all rights, title, and interest in the '377 patent.

97. The application for the '377 patent was filed on June 10, 2022 and claims priority to an application filed on July 15, 2019.



98. Chefman has infringed, and continues to infringe, one or more claims of the '377 patent, including at least claim 1, in violation of 35 U.S.C. § 271 by, among other things, making, using, offering to sell, and/or selling within the United States, supplying or causing to be supplied in or from the United States, and/or importing into the United States, without authority or license, the Chefman Dual Air Fryer product.

99. The claim chart below details examples of Chefman’s infringement using the Chefman TurboFry® Touch Dual Air Fryer version of the Chefman Dual Air Fryer.

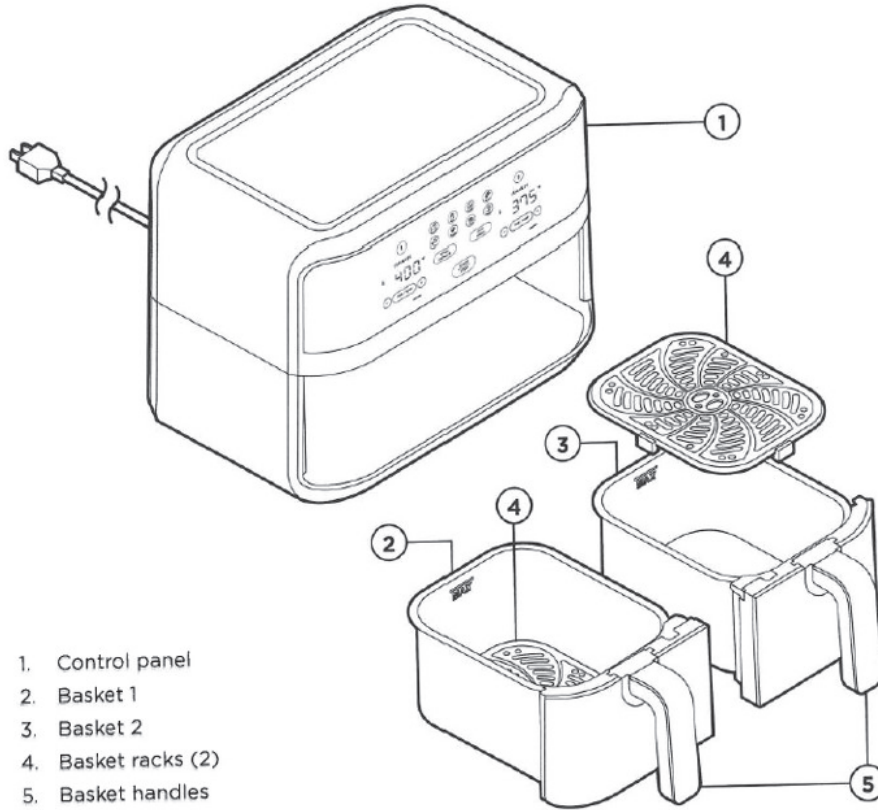
U.S. Patent No. 11,672,377	Evidence of Infringement: Chefman Dual Air Fryer
<p>1[pre]</p> <p>A cooking system comprising:</p>	<p>The Chefman Dual Air Fryer is a cooking system.</p> <p>For example, the Chefman Dual Air Fryer is a system that cooks foods such as “Fries, chicken, fish, bacon, hamburgers, steak, vegetables, [and] shrimp” using time and temperature controls or one of eight “Preset Function[s].”</p> <ul style="list-style-type: none"> <li>• Chefman Website, Double Basket Air Fryer (9-Qt.) (Available at: <a href="https://chefman.com/products/rj38-sqpf-45tdb?srsId=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO">https://chefman.com/products/rj38-sqpf-45tdb?srsId=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO</a>) (“Introducing the Chefman TurboFry Touch Dual Air Fryer, your key to enjoying double the delicious, crispy <b>meals!</b> With two spacious 4.5-quart baskets, you can effortlessly <b>air fry meals</b> for the whole family. <b>Prepare two different foods</b> with different time and temperature settings using the independent touchscreen control panels; <b>air fry the main course</b> in one basket, and the side in the other! Enjoy crispy <b>chicken, fish, steak, and more</b> with <b>eight built-in cooking presets</b> and an adjustable temperature range of 200–400°F. A convenient LED reminder alerts you to shake halfway through <b>cooking</b> time, and the Sync Finish button ensures both baskets finish <b>cooking</b> simultaneously. Cleanup is a breeze with dishwasher-safe accessories and easy-to-clean nonstick baskets. Make <b>mealtimes</b> easier with this sleek and versatile <b>air fryer!</b>”) (emphasis added):</li> </ul>

<p><b>U.S. Patent No. 11,672,377</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	<div data-bbox="446 325 1364 1092"></div> <p data-bbox="446 1102 1364 1239">Cook two foods at once with different time and temperature settings.</p> <ul data-bbox="487 1281 682 1323" style="list-style-type: none"><li>○ Ex. H at 9:</li></ul>

U.S. Patent No.  
11,672,377

Evidence of Infringement: Chefman Dual Air Fryer

FEATURES



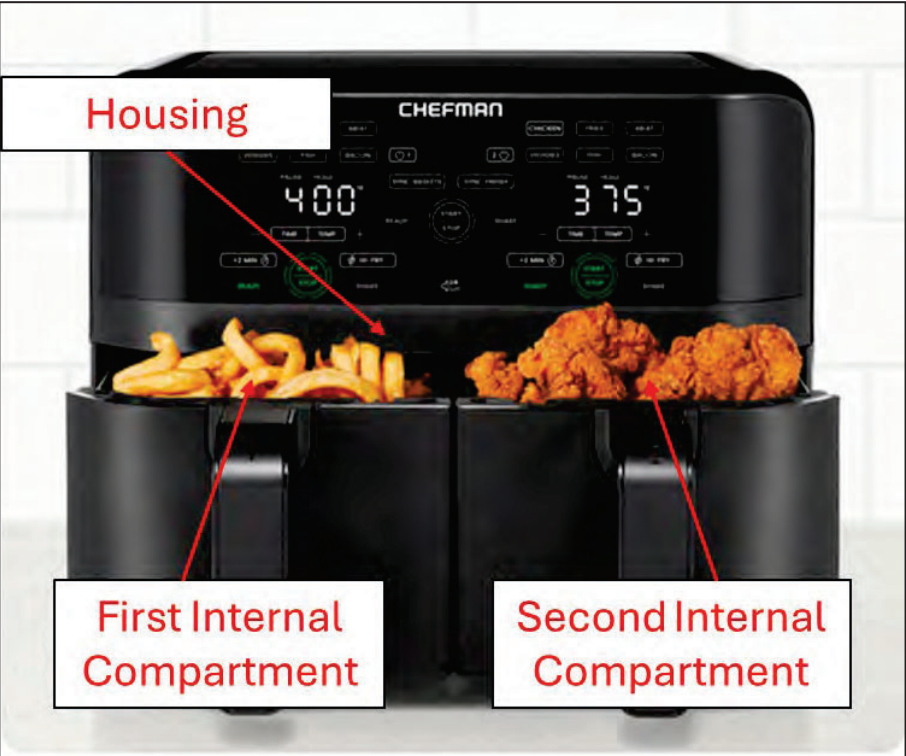
- 1. Control panel
- 2. Basket 1
- 3. Basket 2
- 4. Basket racks (2)
- 5. Basket handles

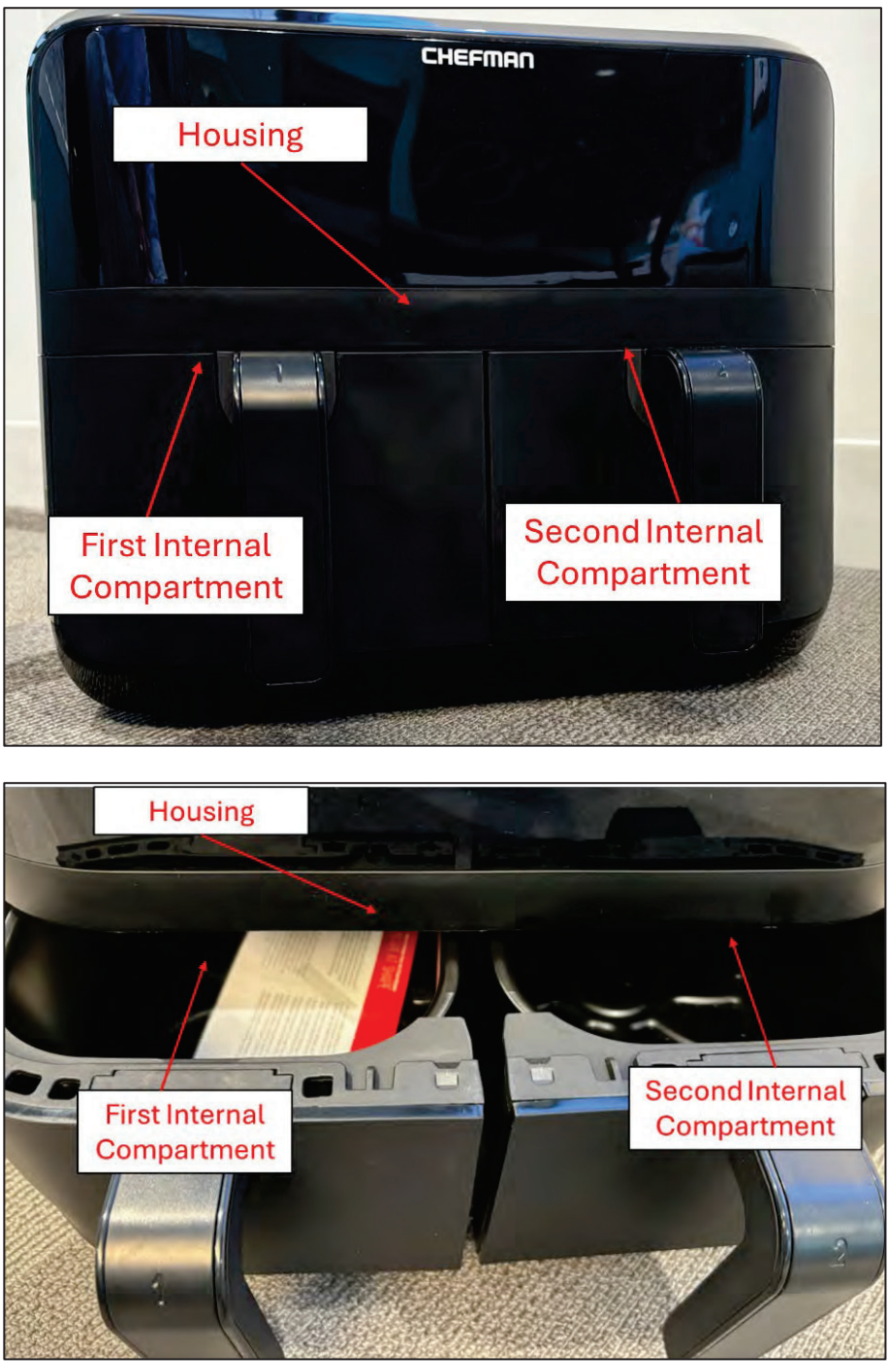
8

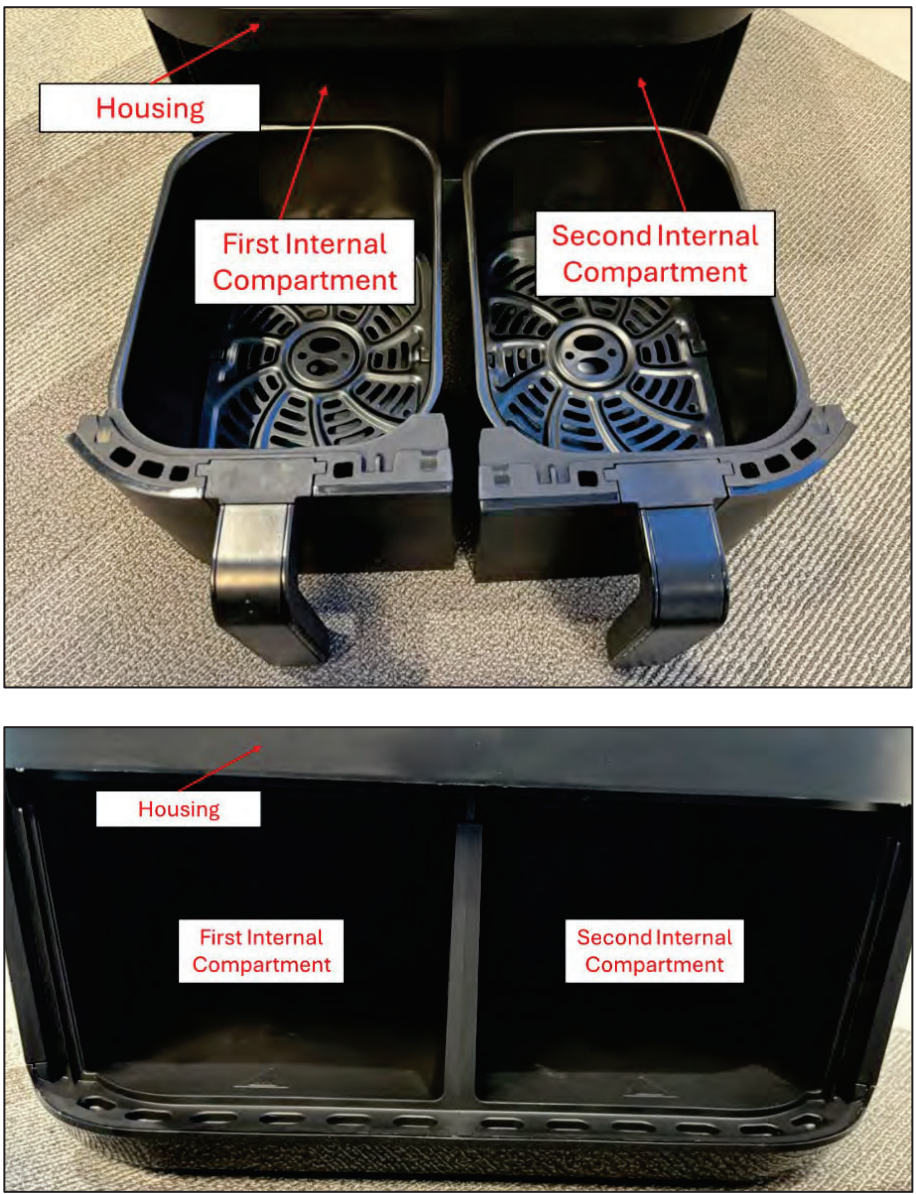
- Ex. H at 10 (showing control buttons “to increase or decrease time and temperature”):

<p><b>U.S. Patent No. 11,672,377</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	<div style="border: 1px solid black; padding: 10px;"> <p style="text-align: center; margin: 0;"><b>CONTROL PANEL</b></p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 20%;"> <p><b>SHAKE Lights</b> Illuminate midway through cooking as a reminder to shake basket.</p> </div> <div style="width: 20%;"> <p><b>START/STOP Button</b> Starts and stops the cooking cycle for the basket number that's illuminated in blue, or for both baskets if the SYNC BASKETS button is illuminated.</p> </div> <div style="width: 20%;"> <p><b>Cooking Preset Buttons</b> Automatically set time and temperature for popular foods.</p> </div> <div style="width: 20%;"> <p><b>Time/Temp Displays</b> Toggle between time and temperature for each basket.</p> </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 20%;"> <p><b>Plus (+) and Minus (-) Buttons</b> Use to increase or decrease time and temperature. Press and hold both on left side to toggle between °F and °C. Press on right side to turn sound off and on.</p> </div> <div style="width: 20%;"> <p><b>Running Lights</b> Illuminate when basket is actively cooking.</p> </div> <div style="width: 20%;"> <p><b>SYNC BASKETS Button</b> Programs both baskets to cook at the same time and temperature.</p> </div> <div style="width: 20%;"> <p><b>SYNC FINISH Button</b> Programs baskets with different cooking times and/or temperatures to finish at the same time.</p> </div> <div style="width: 20%;"> <p><b>TIME/TEMP Buttons</b> Select time or temperature to set for each basket. Time adjusts by 1 minute and temperature by 5°.</p> </div> </div> <p style="text-align: right; margin-top: 10px;">9</p> </div>
	<ul style="list-style-type: none"> <li>• Ex. H at 11:</li> </ul>

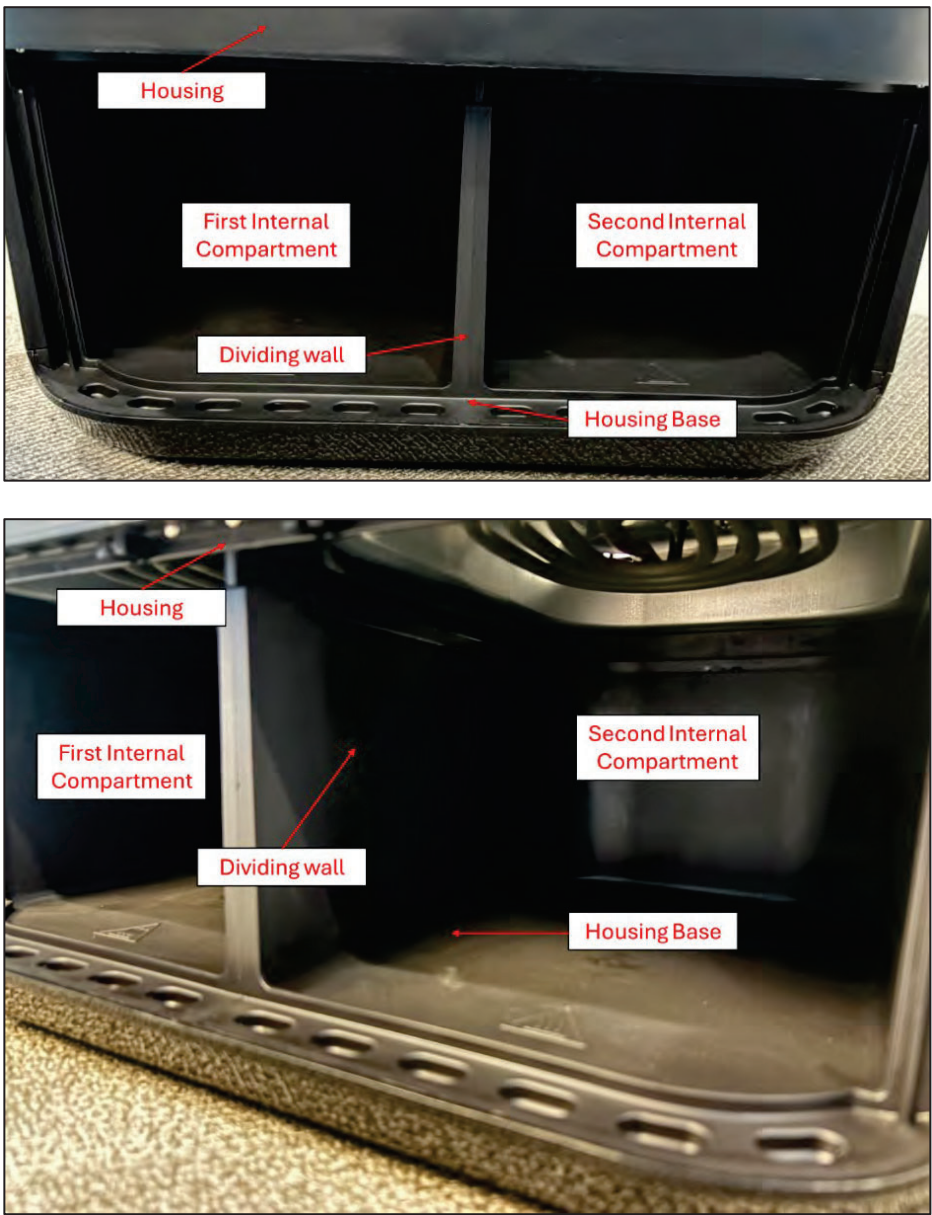
<p><b>U.S. Patent No. 11,672,377</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>																																				
	<div style="border: 1px solid black; padding: 10px;"> <p style="text-align: center;"><b>OPERATING INSTRUCTIONS</b></p> <p style="text-align: center;"><b>PRESET FUNCTION CHART</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #333; color: white;"> <th style="text-align: left;">FOOD</th> <th style="text-align: left;">Default Time</th> <th style="text-align: left;">Default Temp</th> <th style="text-align: left;">Shake/Flip Reminder?</th> </tr> </thead> <tbody> <tr> <td>Fries</td> <td>20 minutes</td> <td>400°F</td> <td>Comes on halfway through cook time</td> </tr> <tr> <td>Chicken</td> <td>30 minutes</td> <td>375°F</td> <td>Comes on halfway through cook time</td> </tr> <tr> <td>Fish</td> <td>10 minutes</td> <td>350°F</td> <td>None</td> </tr> <tr> <td>Bacon</td> <td>12 minutes</td> <td>400°F</td> <td>Comes on halfway through cook time</td> </tr> <tr> <td>Burgers</td> <td>10 minutes</td> <td>350°F</td> <td>Comes on halfway through cook time</td> </tr> <tr> <td>Steak</td> <td>15 minutes</td> <td>400°F</td> <td>Comes on halfway through cook time</td> </tr> <tr> <td>Vegetables</td> <td>15 minutes</td> <td>350°F</td> <td>Comes on halfway through cook time</td> </tr> <tr> <td>Shrimp</td> <td>7 minutes</td> <td>400°F</td> <td>Comes on halfway through cook time</td> </tr> </tbody> </table> </div>	FOOD	Default Time	Default Temp	Shake/Flip Reminder?	Fries	20 minutes	400°F	Comes on halfway through cook time	Chicken	30 minutes	375°F	Comes on halfway through cook time	Fish	10 minutes	350°F	None	Bacon	12 minutes	400°F	Comes on halfway through cook time	Burgers	10 minutes	350°F	Comes on halfway through cook time	Steak	15 minutes	400°F	Comes on halfway through cook time	Vegetables	15 minutes	350°F	Comes on halfway through cook time	Shrimp	7 minutes	400°F	Comes on halfway through cook time
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<p>1[a]  a housing having a first internal compartment and a second internal compartment, the first internal compartment and the second internal compartment being separated by a dividing wall extending upward from a base of the housing;</p>	<p>The Chefman Dual Air Fryer cooking system includes a housing having a first internal compartment and a second internal compartment, the first internal compartment and the second internal compartment being separated by a dividing wall extending upward from a base of the housing.</p> <p>First, the Chefman Dual Air Fryer cooking system includes a housing with a first internal compartment (cooking basket) and a second internal compartment (cooking basket):</p> <ul style="list-style-type: none"> <li>• Chefman Website, Double Basket Air Fryer (9-Qt.) (Available at: <a href="https://chefman.com/products/rj38-sqpf-45tdb?srsId=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO">https://chefman.com/products/rj38-sqpf-45tdb?srsId=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO</a>) (annotations added):</li> </ul>																																				

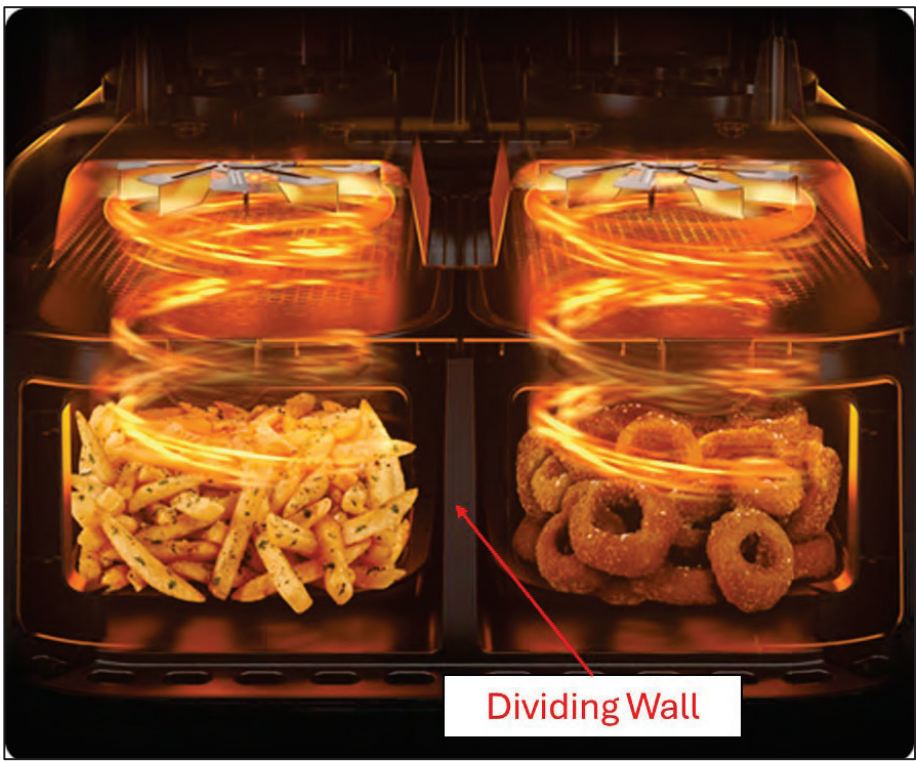
<p><b>U.S. Patent No. 11,672,377</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	 <p><b>Housing</b></p> <p><b>First Internal Compartment</b></p> <p><b>Second Internal Compartment</b></p> <p><b>Cook two foods at once with different time and temperature settings.</b></p> <ul style="list-style-type: none"><li>• The images below of the Chefman Dual Air Fryer cooking system show that the system includes a housing with a first internal compartment (cooking basket) and a second internal compartment (cooking basket):</li></ul>


<b>U.S. Patent No. 11,672,377</b>	<b>Evidence of Infringement: Chefman Dual Air Fryer</b>
	 <p>The top photograph shows the exterior of a black Chefman Dual Air Fryer. A label 'CHEFMAN' is visible at the top. Three red arrows point to specific parts: 'Housing' points to the upper front panel, 'First Internal Compartment' points to the left side of the lower front panel, and 'Second Internal Compartment' points to the right side of the lower front panel.</p> <p>The bottom photograph shows the interior of the air fryer. Three red arrows point to the same parts: 'Housing' points to the upper interior panel, 'First Internal Compartment' points to the left interior compartment, and 'Second Internal Compartment' points to the right interior compartment.</p>

U.S. Patent No. 11,672,377	Evidence of Infringement: Chefman Dual Air Fryer
	 <p>Second, as shown by the images below of the Chefman Dual Air Fryer cooking system, the system's two internal compartments are separated by a dividing wall that extends upward from the base of the housing to the ceiling of each compartment:</p>



U.S. Patent No. 11,672,377	Evidence of Infringement: Chefman Dual Air Fryer
	 <p>The first photograph shows a top-down view of the dual basket air fryer basket. It is a black plastic basket with a central vertical dividing wall. The basket is divided into two internal compartments. The top edge is labeled 'Housing', the central wall is labeled 'Dividing wall', the two sections are labeled 'First Internal Compartment' and 'Second Internal Compartment', and the bottom edge is labeled 'Housing Base'. The second photograph shows a side view of the same basket, highlighting the depth of the compartments and the structure of the dividing wall. Labels 'Housing', 'First Internal Compartment', 'Dividing wall', 'Second Internal Compartment', and 'Housing Base' are also present.</p> <ul style="list-style-type: none"><li>• Chefman Website, Double Basket Air Fryer (9-Qt.) (Available at: <a href="https://chefman.com/products/rj38-sqpf-45tdb?srsltid=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO">https://chefman.com/products/rj38-sqpf-45tdb?srsltid=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO</a>) (annotations added):</li></ul>

<p><b>U.S. Patent No. 11,672,377</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	
<p>1[b] a first cooking container defining a first cooking volume, said first cooking container being removably receivable within said first internal compartment to completely close off an opening to said first internal compartment when fully</p>	<p>The Chefman Dual Air Fryer cooking system includes a first cooking container defining a first cooking volume, said first cooking container being removably receivable within said first internal compartment to completely close off an opening to said first internal compartment when fully inserted therein, and a second cooking container defining a second cooking volume, said second cooking container being removably receivable within said second internal compartment to completely close off an opening to said second internal compartment when fully inserted therein.</p> <p>First, the Chefman Dual Air Fryer cooking system has two baskets (first and second “cooking container[s]”) that are removably receivable within said first internal compartment and said second internal compartment:</p> <ul style="list-style-type: none"> <li>• Ex. H at 6 (“If you choose to use oil, toss food with oil in a separate bowl, and then transfer food to the <b>removable</b> racks or baskets”) (emphasis added).</li> <li>• Chefman Website, Double Basket Air Fryer (9-Qt.) (Available at: <a href="https://chefman.com/products/rj38-sqpf-">https://chefman.com/products/rj38-sqpf-</a></li> </ul>

<b>U.S. Patent No. 11,672,377</b>	<b>Evidence of Infringement: Chefman Dual Air Fryer</b>
<p>inserted therein, and a second cooking container defining a second cooking volume, said second cooking container being removably receivable within said second internal compartment to completely close off an opening to said second internal compartment when fully inserted therein;</p>	<p>45tdb?srsIid=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO) (annotations added):</p>  <p>Ensures differently timed dishes finish together.</p>


**U.S. Patent No.  
11,672,377**

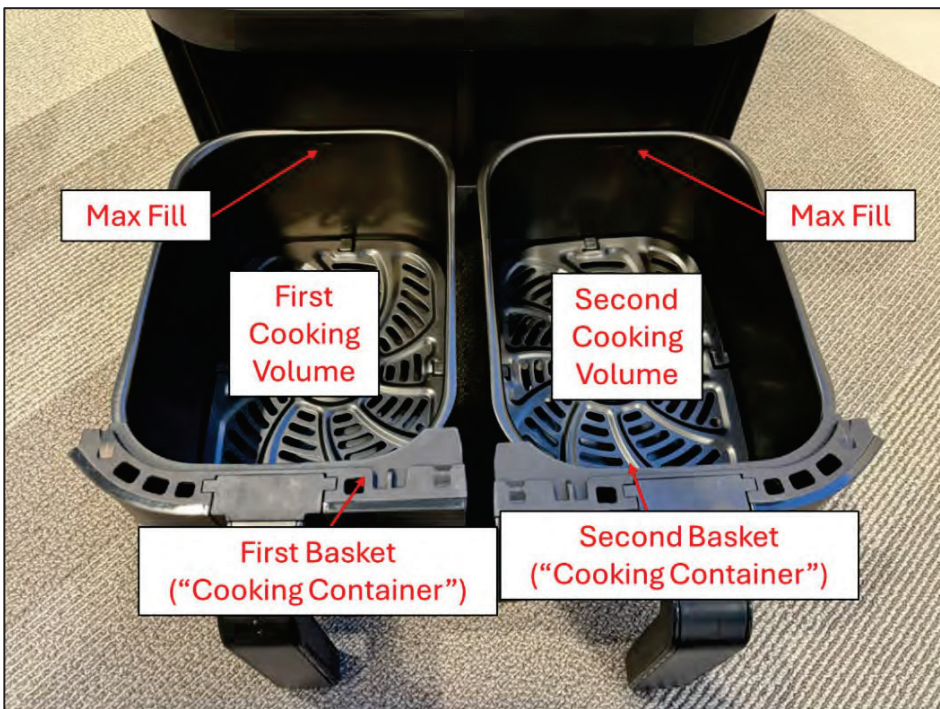
**Evidence of Infringement: Chefman Dual Air Fryer**




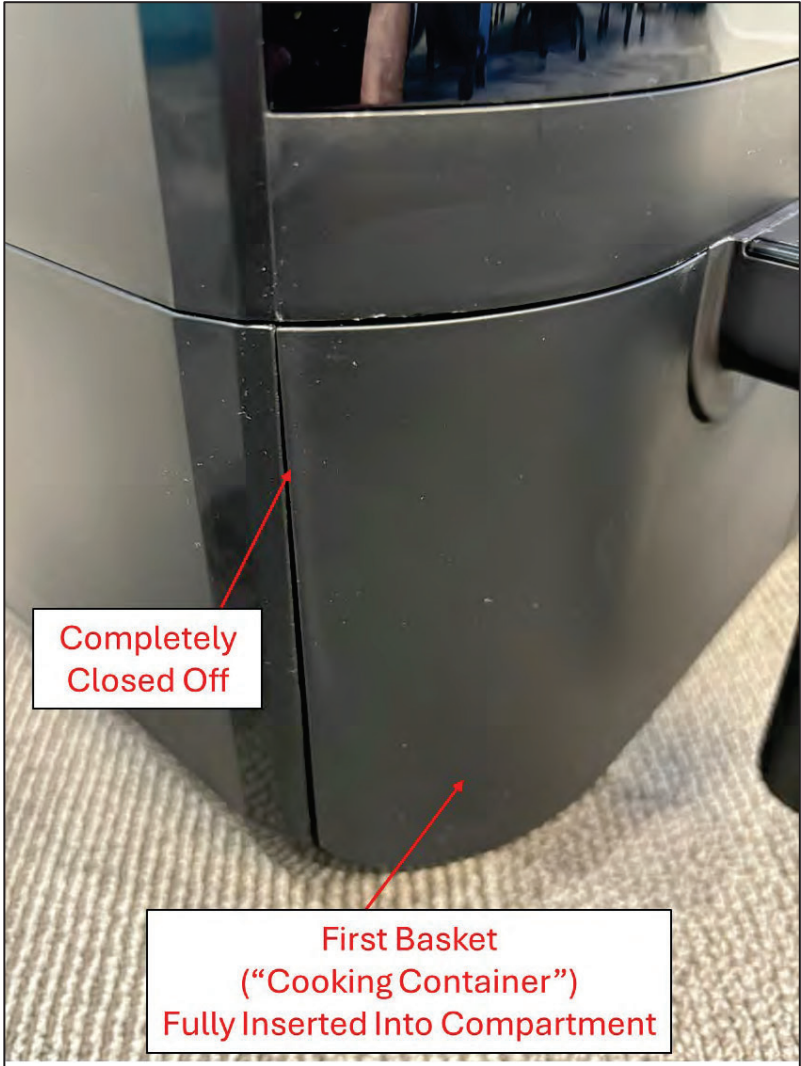
**4.5-quart baskets are top-rack  
dishwasher safe.**

- The removable baskets are shown in the below images of the Chefman Dual Air Fryer:

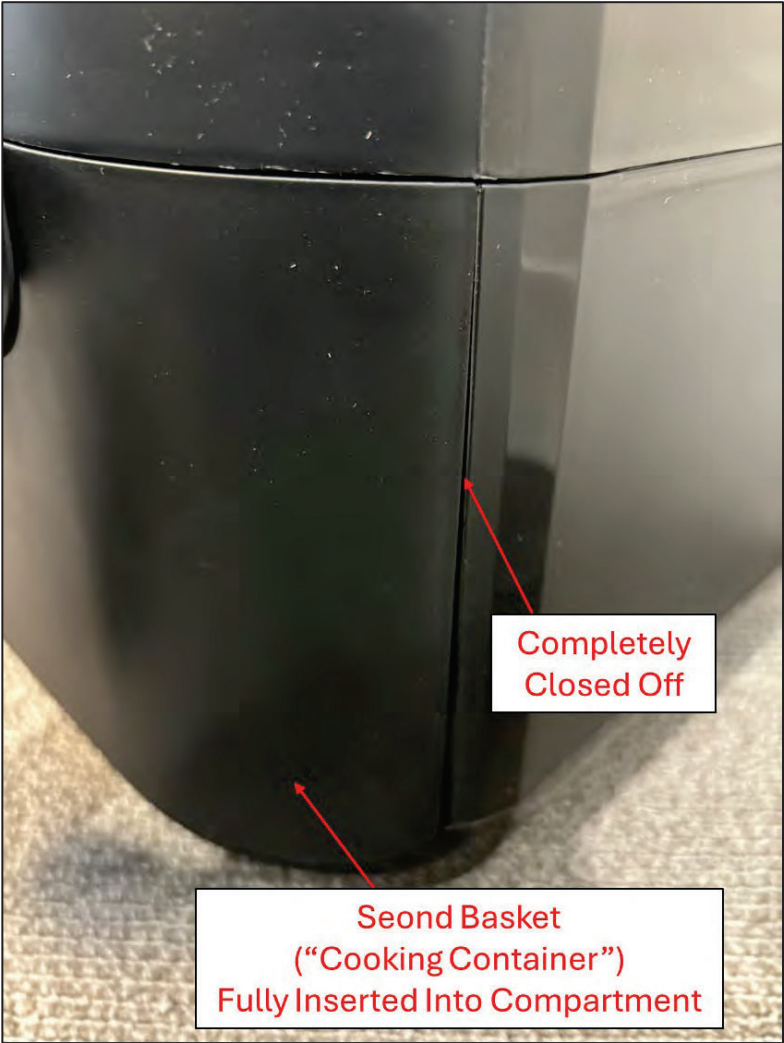
<p>U.S. Patent No. 11,672,377</p>	<p>Evidence of Infringement: Chefman Dual Air Fryer</p>
	 <p>Second, the first cooking container (basket) defines a first cooking volume and the second cooking container (basket) defines a second cooking volume. Specifically, each basket contains a hollow volume to hold food that can be cooked up to a “Max line” that defines the limit of the cooking volume:</p> <ul style="list-style-type: none"><li>• Ex. H at 3 (“<b>Cooking Forward™</b> Whether this is your first Chefman® appliance or you’re already part of our family, we’re happy to be <b>cooking</b> with you! With your new TurboFry® Touch Dual Air Fryer, you can <b>air fry foods</b> to crisp perfection with little to no oil for healthier eating. With <b>two 4.5-quart baskets</b>, you can make a main dish and sides, or heat up two crispy snacks for a game-night spread. The Sync Finish feature allows <b>foods with different cook times</b> to finish at the same time.”) (emphasis added).</li><li>• The images below of the Chefman Dual Air Fryer show the “Max line[s]” and cooking volumes of the baskets of the Chefman Dual Air Fryer system:</li></ul>

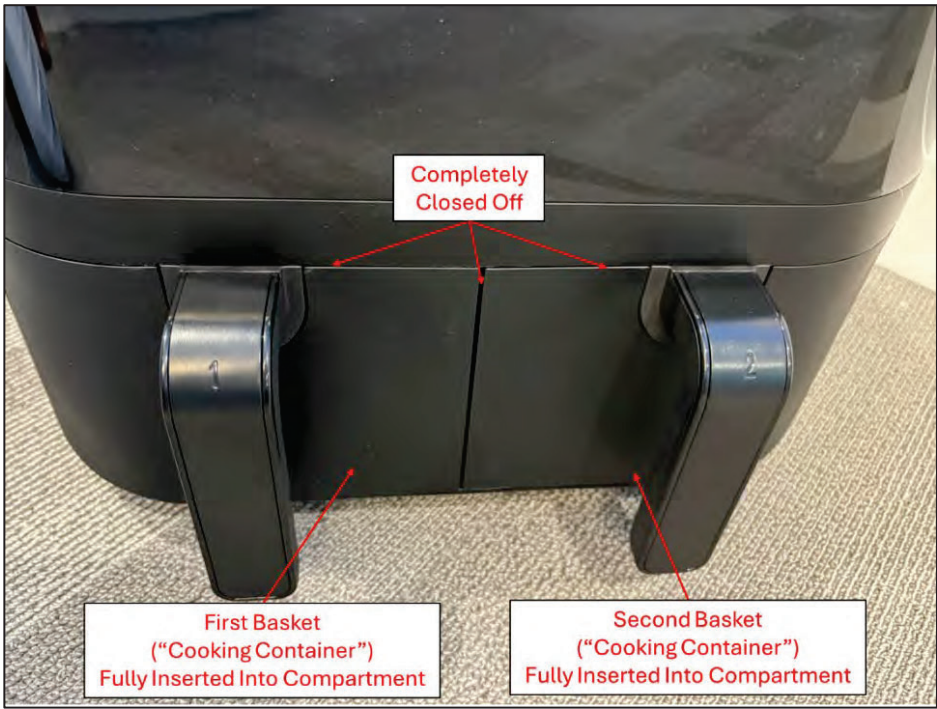
<p><b>U.S. Patent No. 11,672,377</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	 <p>The photograph shows the interior of a dual air fryer with two baskets. Red arrows point from text labels to specific parts of the baskets. The labels are: 'Max Fill' (top left and top right), 'First Cooking Volume' (center left), 'Second Cooking Volume' (center right), 'First Basket ("Cooking Container")' (bottom left), and 'Second Basket ("Cooking Container")' (bottom right).</p>

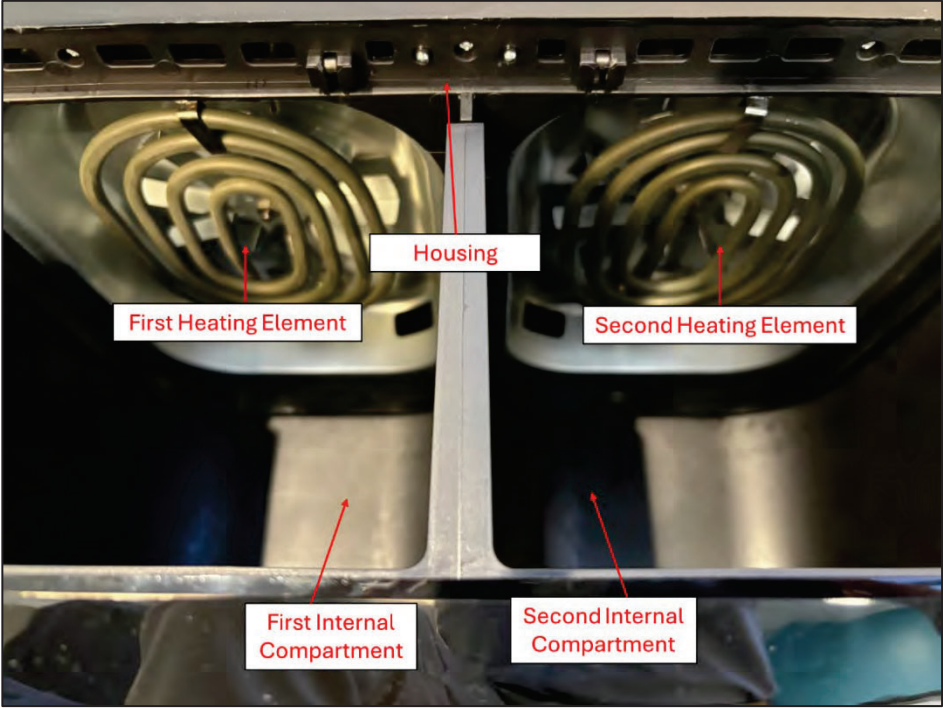
U.S. Patent No. 11,672,377	Evidence of Infringement: Chefman Dual Air Fryer
	 <p>The image shows the interior of a dual air fryer. It features two stainless steel baskets with slatted designs, one positioned above the other. A red arrow points to the upper edge of the top basket, labeled 'Max Fill'. A white box with red text labeled 'Cooking Volume' is positioned between the two baskets, indicating the space available for cooking. The baskets are mounted on a central vertical shaft within a dark-colored inner pot.</p> <p>Third, as shown in the images below of the Chefman Dual Air Fryer, the first cooking container and second cooking container (the baskets) completely close off an opening to the first internal compartment and second internal compartment, respectively, when fully inserted in the compartments:</p>


<b>U.S. Patent No. 11,672,377</b>	<b>Evidence of Infringement: Chefman Dual Air Fryer</b>
	 <p data-bbox="479 934 706 1033"><b>Completely Closed Off</b></p> <p data-bbox="592 1234 1112 1375"><b>First Basket ("Cooking Container") Fully Inserted Into Compartment</b></p>

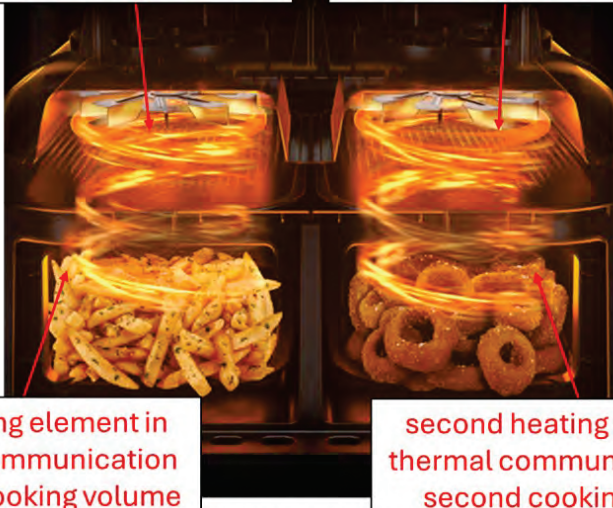


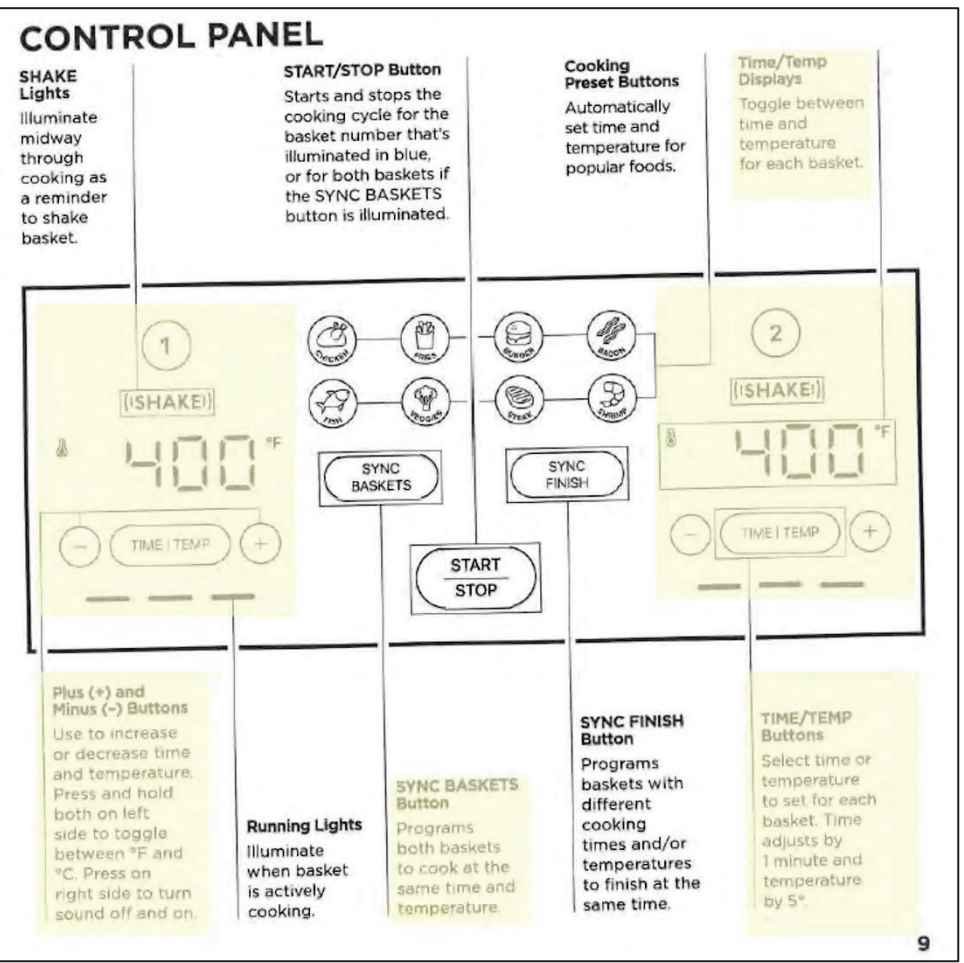
<b>U.S. Patent No. 11,672,377</b>	<b>Evidence of Infringement: Chefman Dual Air Fryer</b>
	 <p data-bbox="938 940 1159 1037"><b>Completely Closed Off</b></p> <p data-bbox="643 1213 1166 1352"><b>Seond Basket ("Cooking Container") Fully Inserted Into Compartment</b></p>

<p><b>U.S. Patent No. 11,672,377</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	
<p>1[c] a first heating element and a second heating element disposed in said housing, said first heating element being in thermal communication with said first cooking volume and said second heating element being in thermal communication with said second cooking volume, the first and second heating elements being independently operable to independently cook food contained within the first and second cooking containers.</p>	<p>The Chefman Dual Air Fryer cooking system includes a first heating element and a second heating element disposed in said housing, said first heating element being in thermal communication with said first cooking volume and said second heating element being in thermal communication with said second cooking volume, the first and second heating elements being independently operable to independently cook food contained within the first and second cooking containers.</p> <p>First, each of the baskets of the Chefman Dual Air Fryer cooking system has its own heating element that is directly above and heats the cooking volume of the basket.</p> <ul style="list-style-type: none"> <li>• Ex. H at 6 (“Some areas do get HOT during use, and the touch screen may get warm. Do not touch the <b>heating elements</b>. Do not place hands or other body parts near the air vents while the air fryer is in use; burns may result. Take caution when handling the hot air fryer rack and all removable parts.”) (emphasis added).</li> <li>• The image below of the Chefman Dual Air Fryer shows first and second electric coil heaters (heating elements) that are within the housing of the Chefman Dual Air Fryer and are above the first and second internal</li> </ul>

<b>U.S. Patent No. 11,672,377</b>	<b>Evidence of Infringement: Chefman Dual Air Fryer</b>
<p>second heating elements being independently operable to independently cook food contained within the first and second cooking containers; and</p>	<p>compartments:</p>  <p>The image shows the interior of a dual air fryer. A central vertical metal housing divides the space into two symmetrical compartments. On the left side, a spiral-shaped electric coil heater is mounted, labeled 'First Heating Element'. On the right side, a similar spiral-shaped electric coil heater is mounted, labeled 'Second Heating Element'. Below each heater is a cylindrical cooking basket, labeled 'First Internal Compartment' and 'Second Internal Compartment' respectively. The top of the unit features a perforated metal grate. Red arrows point from the labels to the corresponding components in the image.</p> <p>Second, the first and second heating elements are in thermal communication with said first cooking volume and second cooking volume, respectively. As the images of the Chefman Dual Air Fryer shown below illustrate, the two electric coil heaters (heating elements) heat the internal compartments into which each basket is placed. Because the baskets contain the first and second cooking volume, the first and second heating elements are in thermal communication with the first and second cooking volumes:</p>

U.S. Patent No. 11,672,377	Evidence of Infringement: Chefman Dual Air Fryer
	 <p>The first photograph shows the interior of the air fryer from a top-down perspective. A red arrow points to a spiral heating element labeled "First Heating Element". Another red arrow points to the surrounding metal structure labeled "Housing". A third red arrow points to the bottom interior surface labeled "First Internal Compartment".</p> <p>The second photograph shows the interior from a different angle. A red arrow points to the metal structure labeled "Housing". Another red arrow points to a second spiral heating element labeled "Second Heating Element". A third red arrow points to the bottom interior surface labeled "Second Internal Compartment".</p> <ul style="list-style-type: none"><li>• Chefman Website, Double Basket Air Fryer (9-Qt.) (Available at:</li></ul>

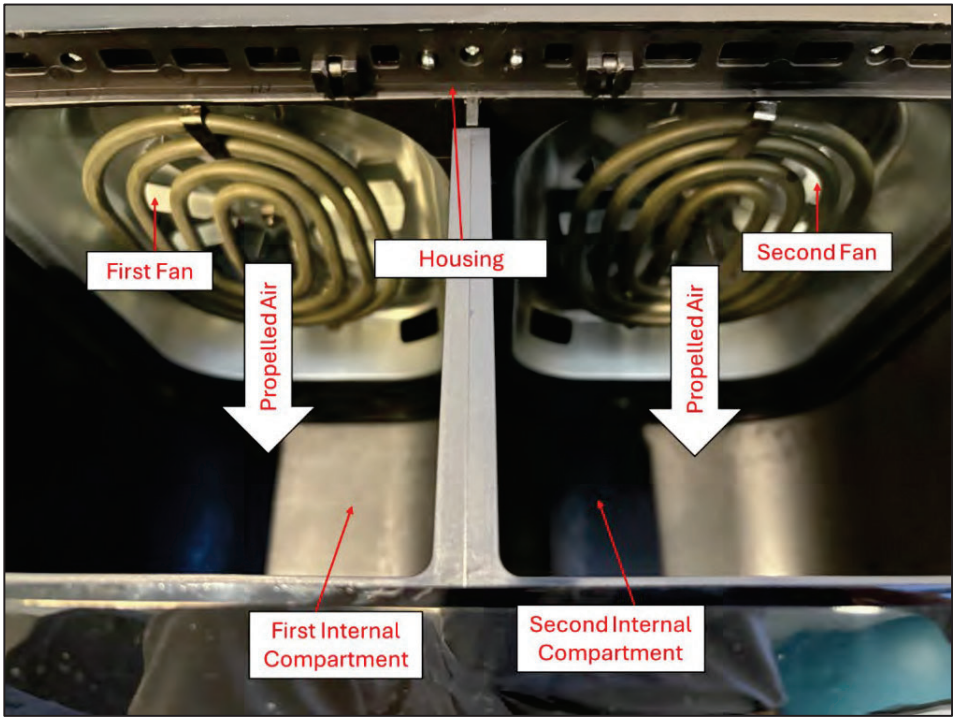
<p><b>U.S. Patent No. 11,672,377</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	<p><a href="https://chefman.com/products/rj38-sqpf-45tdb?srsltid=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO">https://chefman.com/products/rj38-sqpf-45tdb?srsltid=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO</a> (annotations added):</p> <div data-bbox="446 436 1404 1092" style="border: 1px solid black; padding: 10px;">  <p style="text-align: center;"><b>Increases the temperature to 450°F for an extra crispy finish.</b></p> </div> <p>Third, the heating elements of the Chefman Dual Air Fryer are independently operable to independently cook food contained within the first and second baskets (“cooking container[s]”), respectively.</p> <ul style="list-style-type: none"> <li>• For example, the control panel includes separate temperature and time controls and displays for the first and second basket and requires the user to press a “Sync Baskets” button in order to prevent the baskets from being controlled independently:             <ul style="list-style-type: none"> <li>○ Ex. H at 10 (annotations added):</li> </ul> </li> </ul>

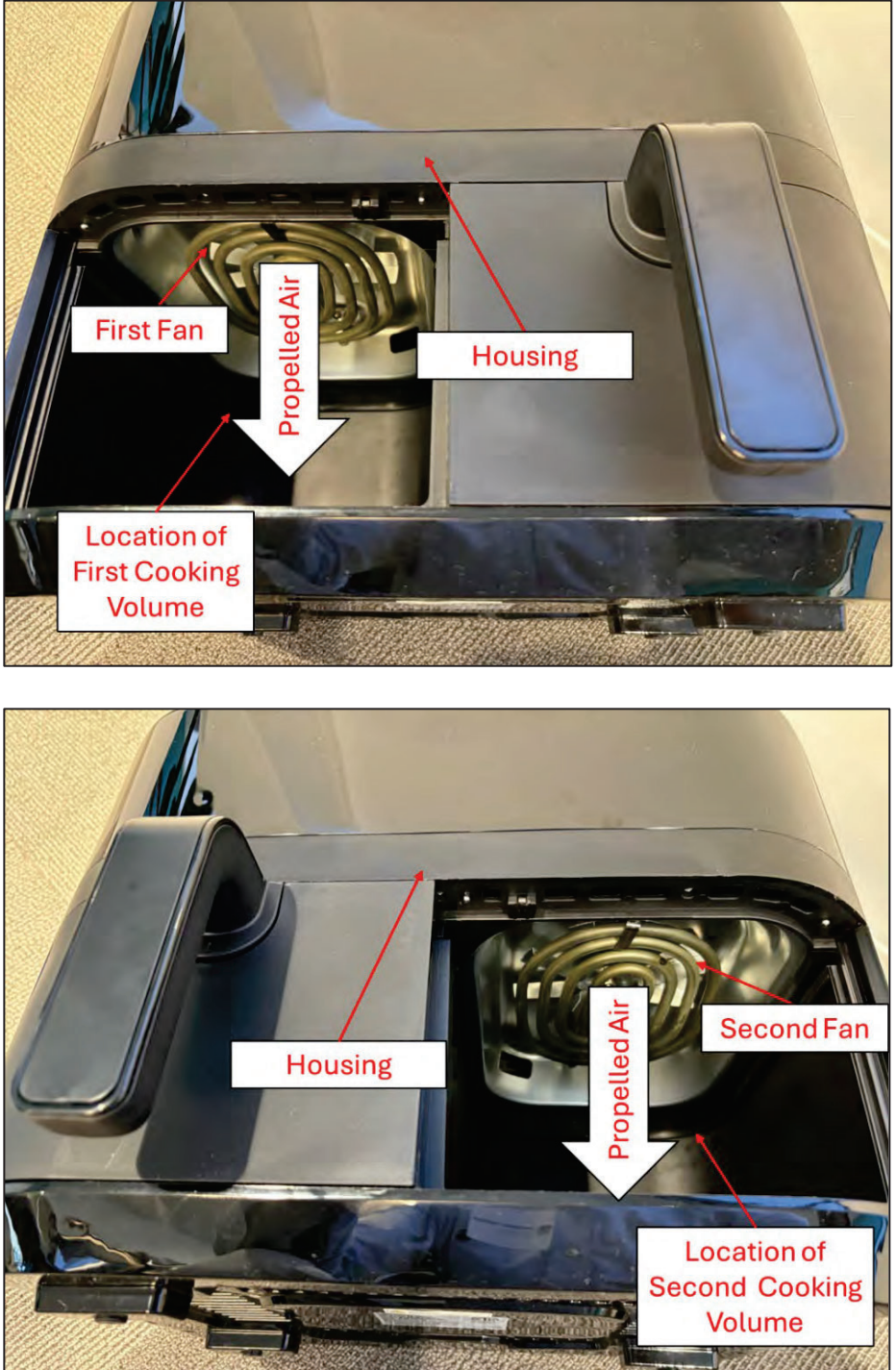
<p><b>U.S. Patent No. 11,672,377</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	<div style="border: 1px solid black; padding: 10px;"> <h3 style="text-align: center;">CONTROL PANEL</h3>  <p>The diagram shows a control panel for a dual-basket air fryer. It features two digital displays, one for each basket, both showing 400°F. Between the displays are several buttons: a central 'START/STOP' button, 'SYNC BASKETS' and 'SYNC FINISH' buttons, and 'Cooking Preset Buttons' for Chicken, Fish, Pork, Bacon, Fry, and Steak. Each display has a 'TIME   TEMP' button with minus and plus signs, and a 'SHAKE' button. Callouts provide detailed descriptions for each feature.</p> <p><b>SHAKE Lights</b> Illuminate midway through cooking as a reminder to shake basket.</p> <p><b>START/STOP Button</b> Starts and stops the cooking cycle for the basket number that's illuminated in blue, or for both baskets if the SYNC BASKETS button is illuminated.</p> <p><b>Cooking Preset Buttons</b> Automatically set time and temperature for popular foods.</p> <p><b>Time/Temp Displays</b> Toggle between time and temperature for each basket.</p> <p><b>Plus (+) and Minus (-) Buttons</b> Use to increase or decrease time and temperature. Press and hold both on left side to toggle between °F and °C. Press on right side to turn sound off and on.</p> <p><b>Running Lights</b> Illuminate when basket is actively cooking.</p> <p><b>SYNC BASKETS Button</b> Programs both baskets to cook at the same time and temperature.</p> <p><b>SYNC FINISH Button</b> Programs baskets with different cooking times and/or temperatures to finish at the same time.</p> <p><b>TIME/TEMP Buttons</b> Select time or temperature to set for each basket. Time adjusts by 1 minute and temperature by 5°.</p> <p style="text-align: right;">9</p> </div> <ul style="list-style-type: none"> <li>• The Chefman Dual Air Fryer User Guide includes instructions on how to “cook in one basket” and independently operate one heating element to cook food in the cooking volume beneath it. Independent control is the system’s “default mode,” and the system permits a user to begin cooking on the second side with different time and temperature settings.             <ul style="list-style-type: none"> <li>○ Ex. H at 13–14 (annotations added):</li> </ul> </li> </ul>

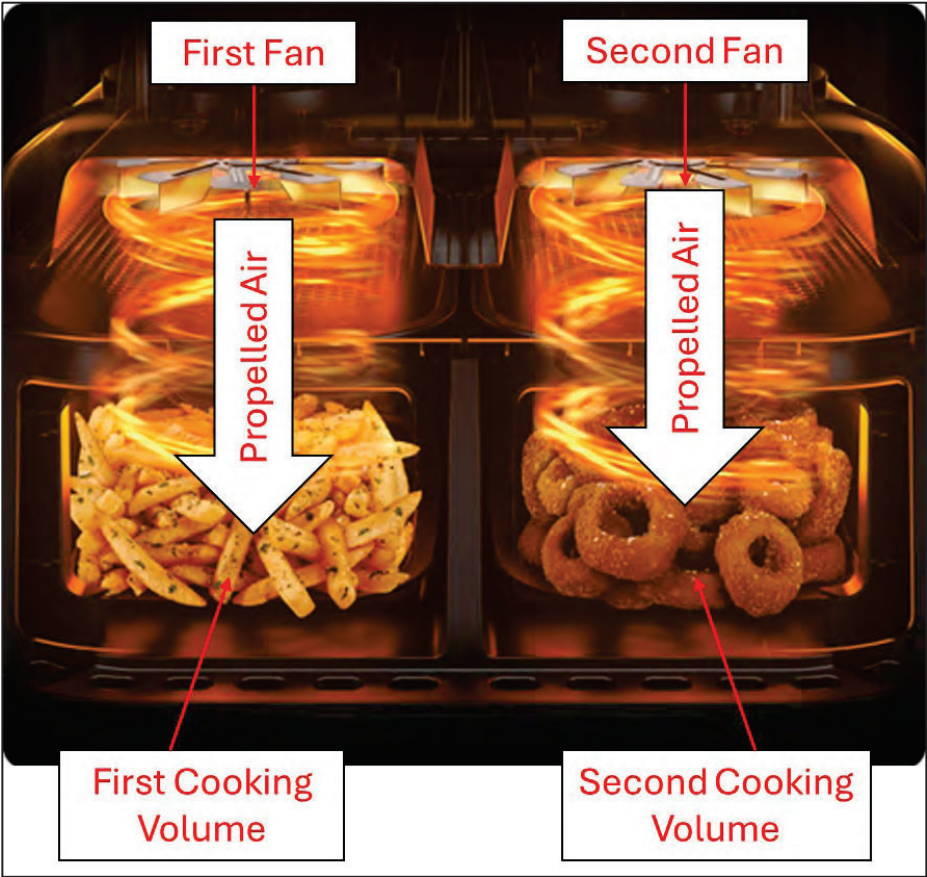
<p><b>U.S. Patent No. 11,672,377</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	<div style="border: 1px solid black; padding: 10px;"> <p><b>HOW TO COOK IN ONE BASKET</b></p> <p>Though the beauty of this air fryer is its double-basket capacity and sync functions, you can easily cook in just one basket, which is the default mode. (The other basket can be removed or left in the unit on standby.)</p> <ol style="list-style-type: none"> <li>1. Prepare for air fryer cooking as directed starting on p. 11.</li> <li>2. <b>Set the time and temperature for basket 1:</b> To set the temperature, press the TIME/TEMP button until the temperature displays, then press the plus (+) or minus (-) sign. To set the time, press the TIME/TEMP button until the time displays, and then press the plus or minus sign. If cooking with a preset function, choose the icon that best represents the food you're cooking and press the icon. This will set the preprogrammed time and temperature. (See chart on p. 10 for details).</li> <li>3. Press START.</li> <li>4. During cooking, the SHAKE light on the control panel will turn on, and the air fryer will beep as a reminder to shake (or flip) food, as necessary. (See chart starting on p. 16 for more details on timing.) The light will turn off immediately when the basket is removed and will go off automatically after about 10 seconds if the basket is not pulled out. (If your food does not need to be shaken, flipped, or turned, simply ignore the warning.)</li> </ol> <p><b>12</b></p> <ol style="list-style-type: none"> <li>5. When the timer is done, the air fryer will turn off automatically. Remove the basket from the unit. Check food for doneness, then carefully transfer the food to plates or a platter and serve.</li> </ol> <p><b>NOTE:</b> While the unit is cooking on one side, you can begin cooking in the other basket at any time. (The Sync Baskets and Sync Finish functions will not be available, however.) Simply press the other basket's button on the display and set the time and temperature for that side. Do NOT press START. The running lights for that basket will come on to show that it's cooking.</p> </div> <ul style="list-style-type: none"> <li>• Chefman Website, Double Basket Air Fryer (9-Qt.) (Available at: <a href="https://chefman.com/products/rj38-sqpf-45tdb?srsltid=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO">https://chefman.com/products/rj38-sqpf-45tdb?srsltid=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO</a>):</li> </ul>

<p><b>U.S. Patent No. 11,672,377</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	<div data-bbox="446 325 1331 1060" data-label="Image"> </div> <div data-bbox="446 1081 1331 1207" data-label="Caption"> <p><b>Independent touchscreen functions for each basket.</b></p> </div> <ul data-bbox="446 1249 1437 1837" style="list-style-type: none"> <li>• Chefman Website, Double Basket Air Fryer (9-Qt.) (Available at: <a href="https://chefman.com/products/rj38-sqpf-45tdb?srsId=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO">https://chefman.com/products/rj38-sqpf-45tdb?srsId=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO</a>) (“Introducing the Chefman TurboFry Touch Dual Air Fryer, your key to enjoying double the delicious, crispy meals! With two spacious 4.5-quart baskets, you can effortlessly air fry meals for the whole family. <b>Prepare two different foods with different time and temperature settings using the independent touchscreen control panels</b>; air fry the main course in one basket, and the side in the other! Enjoy crispy chicken, fish, steak, and more with eight built-in cooking presets and an adjustable temperature range of 200–400°F. A convenient LED reminder alerts you to shake halfway through cooking time, and the Sync Finish button ensures both baskets finish cooking simultaneously. Cleanup is a breeze with dishwasher-safe accessories and easy-to-clean nonstick baskets. Make mealtimes easier with this sleek and versatile air fryer!”) (emphasis added).</li> </ul>



<p><b>U.S. Patent No. 11,672,377</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
<p>1[d] a first fan and a second fan disposed in said housing, said first fan being in fluid communication with said first cooking volume and said second fan being in fluid communication with said second cooking volume.</p>	<p>The Chefman Dual Air Fryer cooking system includes a first fan and a second fan disposed in said housing, said first fan being in fluid communication with said first cooking volume and said second fan being in fluid communication with said second cooking volume.</p> <p>The '377 patent describes fans that “circulate air through the internal compartment[s].” The Chefman Dual Air Fryer contains the same functionality. The Chefman Dual Air Fryer cooking system includes a fan in the housing above each electric coil heater that circulates air through the respective cooking volume underneath.</p> <ul style="list-style-type: none"> <li>• Ex. H at 12 (“The air fryer’s <b>high-speed fans</b> cook your favorite foods quickly.”) (emphasis added).</li> <li>• The image below of the Chefman Dual Air Fryer shows first and second fans in the housing above the electric coil heaters. The fans are in fluid communication with the first and second cooking volumes when they circulate air through the cooking compartments and their respective cooking volumes below:</li> </ul>  <ul style="list-style-type: none"> <li>• The images below of the Chefman Dual Air Fryer show the fans above the internal compartments into which each basket is placed. The fans are</li> </ul>

<b>U.S. Patent No. 11,672,377</b>	<b>Evidence of Infringement: Chefman Dual Air Fryer</b>
	<p data-bbox="487 325 1404 430">in fluid communication with the respective cooking volumes contained within each basket such that each fan propels heated air into the respective cooking volume:</p>  <p>The top photograph shows the interior of the air fryer on the left side. A red arrow points to a fan labeled 'First Fan'. A white arrow labeled 'Propelled Air' points downwards from the fan. A red arrow points to the inner wall labeled 'Housing'. A white box labeled 'Location of First Cooking Volume' is positioned below the fan.</p> <p>The bottom photograph shows the interior of the air fryer on the right side. A red arrow points to a fan labeled 'Second Fan'. A white arrow labeled 'Propelled Air' points downwards from the fan. A red arrow points to the inner wall labeled 'Housing'. A white box labeled 'Location of Second Cooking Volume' is positioned below the fan.</p>

<p><b>U.S. Patent No. 11,672,377</b></p>	<p><b>Evidence of Infringement: Chefman Dual Air Fryer</b></p>
	<ul style="list-style-type: none"> <li>• Chefman Website, Double Basket Air Fryer (9-Qt.) (Available at: <a href="https://chefman.com/products/rj38-sqpf-45tdb?srsId=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO">https://chefman.com/products/rj38-sqpf-45tdb?srsId=AfmBOorxi9JxUJiKEVHhuiltcjMJSKEHif_vVHNub5ZAeqFGVTKaqdBO</a>) (annotations added):</li> </ul> 

100. On information and belief, Chefman has benefited from its infringement of the '026 patent. Chefman's use of the '377 patent has made its Dual Air Fryer product more effective and able to heat food at two different temperatures simultaneously.

101. SharkNinja has sustained damages as a direct and proximate result of Chefman's infringement of the '377 patent. Chefman has used the invention of the '377 patent to directly compete with SharkNinja and its Ninja® Foodi® 2-Basket Air Fryer with DualZone™

Technology, including the 6-in-1 10-Qt DZ550 Series, the 6-in-1 8-Qt DZ201 Series, the 6-in-1

10-Qt DZ401 Series, the 4-in-1 8-Qt DZ100 Series, and the 5-in-1 6-Qt DZ090 Series.

Chefman's infringement of the '377 patent has caused irreparable harm to SharkNinja and will continue to do so unless enjoined. As a result, SharkNinja is entitled to injunctive relief pursuant to 35 U.S.C. § 283. SharkNinja also is entitled to recover damages for Chefman's infringement under 35 U.S.C. § 284. The amount of damages will be proven at trial.

102. Chefman was put on notice of its infringement of the '377 patent at least as early as August 29, 2024, when it received the Notice Letter from SharkNinja regarding its infringement of the '377 patent.

103. Chefman was further put on notice of its infringement of the '377 patent at least as early as the filing of the Complaint in this action.

104. Chefman's continued infringement of the '377 patent after it has received notice of the '377 patent and its infringement of the patent is intentional, knowing, and willful.

#### **IX. COUNT VI: INFRINGEMENT OF THE '669 PATENT**

105. SharkNinja incorporates by reference and realleges the allegations in paragraphs 1–104.

106. U.S. Patent No. D986,669 (Exhibit F), entitled "Food Preparation Device," was duly and properly issued by the United States Patent and Trademark Office ("USPTO") on May 23, 2023.

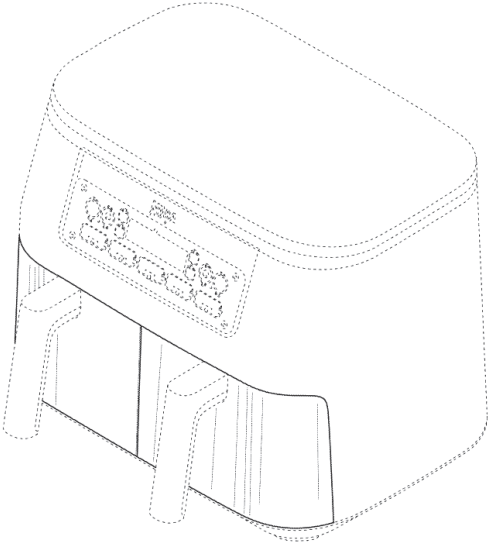

107. SharkNinja owns all rights, title, and interest in the '669 patent.

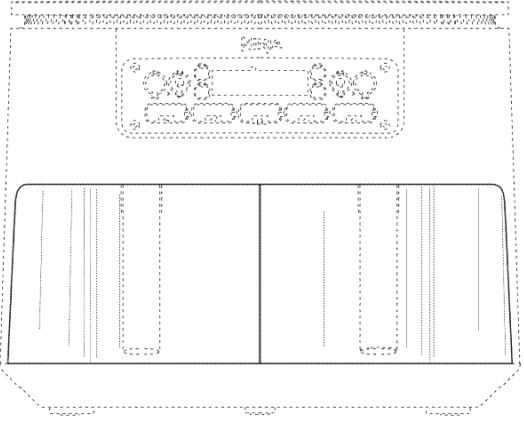

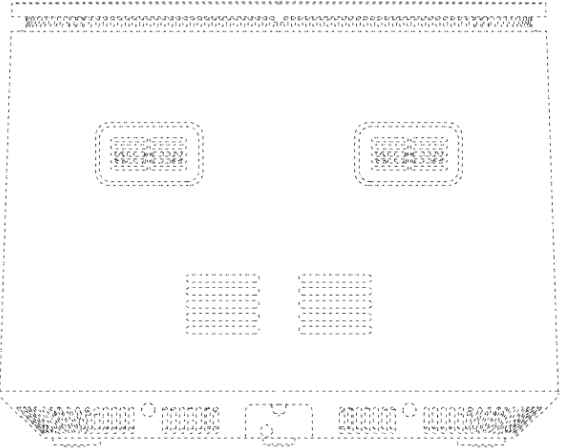

108. The application for the '669 patent was filed on December 15, 2021 and claims priority to an application filed on June 20, 2020.

109. Chefman has infringed, and continues to infringe, the claim of the '669 patent in violation of 35 U.S.C. § 271 by, among other things, making, using, offering to sell, and/or

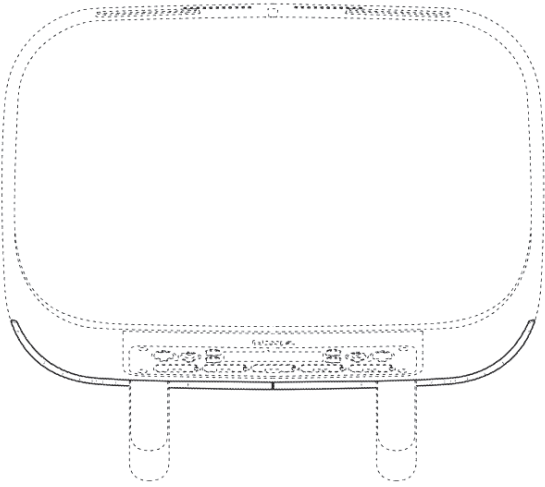

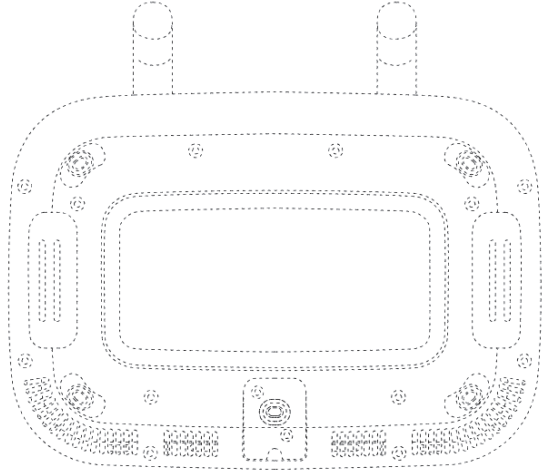

selling within the United States, supplying or causing to be supplied in or from the United States, and/or importing into the United States, without authority or license, the Chefman Dual Air Fryer product.

110. The claim chart below details examples of Chefman’s infringement, using the using the Chefman TurboFry® Touch Dual Air Fryer version of the Chefman Dual Air Fryer.

<b>U.S. Patent No. D986,669</b>	<b>Evidence of Infringement: Chefman Dual Air Fryer</b>
 <p data-bbox="462 1297 548 1333">FIG. 1</p>	

U.S. Patent No. D986,669	Evidence of Infringement: Chefman Dual Air Fryer
 <p data-bbox="461 842 548 873">FIG. 2</p>	
 <p data-bbox="461 1409 548 1440">FIG. 3</p>	

U.S. Patent No. D986,669	Evidence of Infringement: Chefman Dual Air Fryer
 <p data-bbox="461 856 548 888">FIG. 4</p>	
 <p data-bbox="461 1514 548 1545">FIG. 5</p>	

U.S. Patent No. D986,669	Evidence of Infringement: Chefman Dual Air Fryer
 <p data-bbox="462 823 548 848">FIG. 6</p>	
 <p data-bbox="462 1337 548 1362">FIG. 7</p>	

111. On information and belief, Chefman has benefited from its infringement of the '669 patent. Chefman's use of the design of '669 patent has enhanced the ornamental appearance of its Dual Air Fryer product.

112. SharkNinja has sustained damages as a direct and proximate result of Chefman's infringement of the '669 patent. Chefman has used the invention of the '669 patent to directly compete with SharkNinja and its Ninja® Foodi® 2-Basket Air Fryer with DualZone™



Technology, including the 6-in-1 10-Qt DZ550 Series, the 6-in-1 8-Qt DZ201 Series, the 6-in-1 10-Qt DZ401 Series, the 4-in-1 8-Qt DZ100 Series, and the 5-in-1 6-Qt DZ090 Series.

Chefman's infringement of the '669 patent has caused irreparable harm to SharkNinja and will continue to do so unless enjoined. As a result, SharkNinja is entitled to injunctive relief pursuant to 35 U.S.C. § 283. SharkNinja also is entitled to recover damages for Chefman's infringement under 35 U.S.C. §§ 284 and 289, including an award of any and all profits received or derived by Chefman from the manufacture, marketing, sale, offering for sale and/or distribution of products or services bearing or using any copy or colorable limitation of the '669 patent. The amount of damages will be proven at trial.

113. Chefman was put on notice of its infringement of the '669 patent at least as early as August 29, 2024, when it received the Notice Letter from SharkNinja regarding its infringement of the '669 patent.

114. Chefman was further put on notice of its infringement of the '669 patent at least as early as the filing of the Complaint in this action.

115. Chefman's continued infringement of the '669 patent after it has received notice of the '669 patent and its infringement of the patent is intentional, knowing, and willful.

## **X. PRAYER FOR RELIEF**

WHEREFORE, SharkNinja prays for relief, as follows:

- a. A judgment that each of the Asserted SharkNinja Patents is valid and enforceable.
- b. A judgment that Chefman has infringed one or more claims of each of the Asserted SharkNinja Patents.

- c. A judgment awarding SharkNinja all damages adequate to compensate for Chefman's infringement of SharkNinja's asserted patents, including all pre-judgment and post-judgment interest at the maximum rate permitted by law.
- d. A preliminary and permanent injunction restraining Chefman, its officers, agents, servants, employees, attorneys, and those persons acting in concert with Chefman, from making, using, offering to sell, selling, distributing, and/or importing the Infringing Chefman Products.
- e. A judgment that Chefman's infringement of the Asserted SharkNinja Patents has been willful.
- f. A judgment that damages should be trebled pursuant to 35 U.S.C. § 284 because of Chefman's willful infringement of the Asserted SharkNinja Patents.
- g. A judgment that this is an exceptional case and an award to SharkNinja of its costs and reasonable attorneys' fees incurred in this action as provided by 35 U.S.C. § 285; and
- h. Such other relief as this Court deems just and proper.

#### **XI. DEMAND FOR JURY TRIAL**

Pursuant to Federal Rule of Civil Procedure 38(b), SharkNinja hereby demands trial by jury on all issues raised in this Complaint.

Dated: September 5, 2024

OF COUNSEL:

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*Attorneys for Plaintiffs SharkNinja Operating  
LLC and SharkNinja Sales Company*

**LOCAL RULE 11.2 CERTIFICATION**

I hereby certify that, to the best of my knowledge, the matter in controversy is not the subject of any other pending litigation in any court, administrative proceeding, or arbitration proceeding, nor are there any non-parties known to Plaintiffs that should be joined to this action.

/s/ Liza M. Walsh  
Liza M. Walsh

**LOCAL RULE 201.1 CERTIFICATION**

I hereby certify that the above-captioned matter is not subject to compulsory arbitration in that the Plaintiffs seek, inter alia, injunctive relief.

/s/ Liza M. Walsh  
Liza M. Walsh