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Attorneys for Plaintiff Champion Power Equipment, Inc.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

Champion Power Equipment, Inc.,

Plaintiff,

v.

Firman Power Equipment Inc,

Defendant.

No. CV-23-2371-PHX-DWL

FIRST AMENDED COMPLAINT AND DEMAND FOR JURY TRIAL

CHAMPION POWER EQUIPMENT, INC. ("Champion") by and through its undersigned attorneys, Ziolkowski Patent Solutions Group, SC and Snell & Wilmer L.L.P., hereby files this complaint for patent infringement against FIRMAN POWER EQUIPMENT INC. ("Firman") and alleges as follows:

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THE PARTIES

1. Champion is a duly organized and operating Nevada corporation whose principal place of business is located at 12039 Smith Avenue, Santa Fe Springs, California 90670. Champion designs and sells single-fuel and multi-fuel generators, power stations, log splitters, chipper shredders, leaf blowers, tillers, chainsaws, cultivators, lawn edgers, augers, string trimmers, pressure washers, water pumps, snow blowers, winches, hoists, accessories, and other equipment.

2. Champion goes to great lengths in protecting its proprietary intellectual property and expends considerable resources in obtaining patents in the United States and other foreign jurisdictions. Champion has filed over 70 patent applications and has been awarded 53 U.S. patents.

3. Firman is a duly organized and operating Arizona Corporation whose principal place of business is located at 8644 W Ludlow Dr., Peoria, Arizona 85381. Upon information and belief, Firman imports and sells single-fuel and multi-fuel generators, power stations, log splitters, and accessories that directly compete with Champion. Firman advertises its products for sale nationally and has advertised, marketed, and sold products infringing Champion's intellectual property rights within the State of Arizona, this district, and all other states and territories of the United States.

4. Firman hired a key Champion employee, Mr. Greg Montgomery ("Montgomery"), as its President in 2015 and shortly thereafter began importing and selling generators having Champion technology incorporated therein. Montgomery worked at Champion from 2005 until December 12, 2014. Montgomery was the Vice President of Sales for Champion and a key employee who had intimate and confidential knowledge of Champion's product development, designs, operation, componentry, goals, testing, shipment timeframes, customer information, customer demands, and all relevant information regarding Champion's novel developments regarding dual-fuel and multi-fuel generators.

5. Montgomery attended strategic design meetings at Champion's worldwide research and product development center in Waukesha, Wisconsin numerous times, including a multi-day "Product Meeting" held on July 8–10, 2014 where he met with the design team for the multi-fuel generators at the Champion research center, including the Vice President of Engineering, Mark Sarder, the lead inventor on the Champion dual/multi-fuel patents asserted herein.

6. Montgomery also attended a high-level, confidential Webex meeting that included Champion ownership, top management, and engineering for the 3100W Dual Fuel Generator on October, 30, 2014 to discuss "Sales Opportunities," "Product Structure," "Production Schedule," and "Development Challenges," that included the lead inventor and Vice President of Engineering, Mark Sarder.

7. On November 18, 2014, less than one month prior to Montgomery's departure from Champion, Montgomery accessed the "Dual Fuel Switch mock-up" via email.

8. During these meetings, along with many others and many other internal email communications, Montgomery acquired the technical information from Champion that allowed Firman to produce dual-fuel and multi-fuel generators and acquired from Mr. Sarder subject matter information of patents asserted herein. According to public records, Firman has not filed for a single patent application in the United States and has no issued patents.

9. In 2016, Firman changed its color scheme to mimic that of Champion's. Prior to 2016, Firman used a green and black color scheme and a red and black color scheme, then in early 2016, just one year after appointing Montgomery President of Firman, Firman changed its color scheme to yellow and black, essentially the same as Champion's color scheme.

10. Champion has sent Firman cease and desist demands. Firman has ignored those demands and continues to sell infringing generators.

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JURISDICTION AND VENUE

11. This is an action for patent infringement under the patent laws of the United States, 35 U.S.C. §§ 271, *et seq*.

12. This Court has jurisdiction over the subject matter of this patent infringement action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

13. This Court has personal jurisdiction over Firman because Firman has committed acts of patent infringement within the State of Arizona giving rise to this action. Firman's electronic commerce advertisements, offers for sale, and sales have established at least minimum contacts with the forum such that the exercise of jurisdiction over it would not offend traditional notions of fair play and substantial justice.

14. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(a), 1391(b), 1391(c), and 1400(b) for at least the reasons that: (1) Firman resides in this district; and (2) Firman has committed acts within this district giving rise to this action and does business in this district, including sales, offers for sale, and providing service and/or support to its customers in this district.

COUNT I: INFRINGEMENT OF U.S. PATENT NO. 10,221,780

15. Paragraphs 1 through 14 are incorporated by reference as if fully set forth herein.

16. U.S. Patent No. 10,221,780 is titled "DUAL FUEL LOCKOUT SWITCH FOR GENERATOR ENGINE." U.S. Patent No. 10,221,780 was duly and legally issued on March 5, 2019. A true and correct copy of U.S. Patent No. 10,221,780 is attached as Exhibit A.

17. Champion is the lawful assignee of the entire right, title, and interest in and to U.S. Patent No. 10,221,780 and possesses all rights of recovery under the patent, including the right to recover damages for past infringement.

18. Champion has acquired and inspected the following Firman generator models that Firman has been and is making, using, selling, or offering for sale within the United States, or importing into the United States:

a. Model H03651, a dual fuel portable generator;

b. Model H03652, a dual fuel portable generator;

c. Model H05751, a dual fuel portable generator;

d. Model H05752, a dual fuel portable generator;

e. Model H05753, a dual fuel portable generator;

f. Model H07552, a dual fuel portable generator;

g. Model H07553, a dual fuel portable generator;

h. Model H08051, a dual fuel portable generator;

i. Model H08053, a dual fuel portable generator;

j. Model T04073, a tri fuel portable generator;

k. Model T07571, a tri fuel portable generator;

l. Model T07573, a tri fuel portable generator;

m. Model T08071, a tri fuel portable generator;

n. Model T08072, a tri fuel portable generator;

o. Model T09275, a tri fuel portable generator;

p. Model T09371, a tri fuel portable generator;

q. Model WH02942, a dual fuel inverter portable generator;

r. Model WH03041, a dual fuel inverter portable generator;

s. Model WH03042, a dual fuel inverter portable generator;

t. Model WH03242, a dual fuel inverter portable generator;

u. Model WH03344, a dual fuel inverter portable generator;

v. Model WH03562OF, a dual fuel open frame inverter portable generator; and

w. Model WH03662OF, a dual fuel open frame inverter portable generator.

19. Upon acquisition, disassembly as needed, review of owner's manuals and electrical schematics, and inspection, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 2, 6-9, 11, and 13-15 of U.S. Patent No. 10,221,780. Each of the foregoing Firman generator models infringes:

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a. Independent claim 1 by specifically including a mechanical fuel lockout switch for a dual fuel engine having a mechanical fuel valve actuateable between a first position and a second position to selectively control fuel flow to the dual fuel engine from a first fuel source through a first fuel line and a second fuel source through a second fuel line and a fuel lockout apparatus coupled to the mechanical fuel valve, wherein the mechanical fuel lockout switch communicates the first fuel source to the dual fuel engine and prevents communication between the second fuel source and the dual fuel engine when the mechanical fuel valve is in the first position and communicates the second fuel source to the dual fuel engine and interrupts the first fuel source communication with the dual fuel engine when in the second position and wherein the fuel lockout apparatus is configured to prevent the second fuel source from coupling to the second fuel line while the mechanical fuel valve is in the first position and permit the second fuel source to couple to the second fuel line while the mechanical fuel valve is in the second position, as called for in claim 1 of U.S. Patent No. 10,221,780.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, the fuel lockout apparatus prevents actuation of the mechanical fuel valve to the first position when the second fuel source communicates with the dual fuel engine, as called for in claim 2 of U.S. Patent No. 10,221,780.

c. Dependent claim 6 by specifically including all the aforementioned elements of claim 1 and, in addition, the mechanical fuel valve and the fuel lockout apparatus operate together to ensure that fuel from the first fuel source and fuel from the second fuel source are not simultaneously delivered to the dual fuel engine, as called for in claim 6 of U.S. Patent No. 10,221,780.

d. Dependent claim 7 by specifically including all the aforementioned elements of claim 6 and, in addition, the first fuel source provides liquid fuel from a

liquid fuel tank to the dual fuel engine and the second fuel source provides gaseous fuel from a pressurized fuel container to the dual fuel engine, as called for in claim 7 of U.S. Patent No. 10,221,780.

e. Independent claim 8 by specifically including a mechanical fuel lockout switch for an internal combustion engine, the mechanical fuel lockout being assembled by providing an internal combustion engine configured to operate on a fuel from a first fuel source and a different fuel from a second fuel source, coupling a mechanical fuel valve to the internal combustion engine actuateable between a first position and a second position to selectively control fuel flow to the internal combustion engine from the first fuel source through a first fuel line and the second fuel source through a second fuel line, and coupling a fuel lockout apparatus to the mechanical fuel valve, wherein the fuel lockout apparatus prevents actuation of the mechanical fuel valve to the first position when the second fuel source is coupled to the internal combustion engine, as called for in claim 8 of U.S. Patent No. 10,221,780.

f. Dependent claim 9 by specifically including all the aforementioned elements of claim 8 and, in addition, the fuel lockout apparatus is further configured to prevent coupling of the second fuel source to the second fuel line while the mechanical fuel valve is in the first position and to permit coupling of the second fuel source to the second fuel line while the mechanical fuel valve is in the second position, as called for in claim 9 of U.S. Patent No. 10,221,780.

g. Dependent claim 11 by specifically including all the aforementioned elements of claim 8 and, in addition, the mechanical fuel lockout switch is assembled by coupling a fuel regulator system to the second fuel source to reduce fuel pressure therefrom and deliver fuel to the second fuel line at a

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pressure required for operation of the internal combustion engine, as called for in claim 11 of U.S. Patent No. 10,221,780.

h. Dependent claim 13 by specifically including all the aforementioned elements of claim 11 and, in addition, the mechanical fuel lockout switch is assembled by coupling one end of a quick-disconnect hose coupling to an inlet on the internal combustion engine for the second fuel source and coupling a mating end of the quick-disconnect hose coupling to an outlet of the fuel regulator system, as called for in claim 13 of U.S. Patent No. 10,221,780.

i. Dependent claim 14 by specifically including all the aforementioned elements of claim 8 and, in addition, the mechanical fuel lockout switch is assembled by providing gasoline in a liquid fuel tank as the first fuel source and a liquefied petroleum gas (LPG) in a pressurized fuel container as the second fuel source, as called for in claim 14 of U.S. Patent No. 10,221,780.

j. Independent claim 15 by specifically including a mechanical fuel lockout switch for a dual fuel engine having a mechanical fuel valve actuateable between a first position and a second position to selectively control fuel flow to the dual fuel engine from a first fuel source through a first fuel line and a second fuel source through a second fuel line and a fuel lockout apparatus coupled to the mechanical fuel valve, wherein the mechanical fuel lockout switch communicates the first fuel source to the dual fuel engine and prevents communication between the second fuel source and the dual fuel engine when the mechanical fuel valve is in the first position and communicates the second fuel source to the dual fuel engine and interrupts the first fuel source communication with the dual fuel engine when in the second position and wherein the fuel lockout apparatus prevents actuation of the mechanical fuel valve to the first position when the second fuel source communicates with the dual fuel engine.

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Therefore, each of the foregoing Firman generator models listed in Paragraph 18(a)-(w) infringes at least claims 1, 2, 6-9, 11, and 13-15 of U.S. Patent No. 10,221,780.

20. Upon information and belief, Firman has been and is now making, using, selling, or offering for sale within the United States, or importing into the United States, the following additional generator models:

a. Model H03654, a dual fuel portable generator;

b. Model H05754, a dual fuel portable generator;

c. Model H07554, a dual fuel portable generator;

d. Model H08052, a dual fuel portable generator;

e. Model T07571F, a refurbished tri fuel portable generator;

f. Model WH02942F, a refurbished dual fuel inverter portable generator;

g. Model WH03242F, a refurbished dual fuel inverter portable generator; and

h. Model WH03342, a dual fuel inverter portable generator.

21. Upon review of images, owner's manuals, and electrical schematics of the foregoing Firman generator models and comparisons of the images, owner's manuals, and electrical schematics of the foregoing Firman generator models to those of the Firman generator models listed in Paragraph 18, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 2, 6-9, 11, and 13-15 of U.S. Patent No. 10,221,780. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a mechanical fuel lockout switch for a dual fuel engine having a mechanical fuel valve actuateable between a first position and a second position to selectively control fuel flow to the dual fuel engine from a first fuel source through a first fuel line and a second fuel source through a second fuel line and a fuel lockout apparatus coupled to the mechanical fuel valve, wherein the mechanical fuel lockout switch communicates the first fuel source to the dual fuel engine and prevents communication between the second fuel source and the dual fuel

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engine when the mechanical fuel valve is in the first position and communicates the second fuel source to the dual fuel engine and interrupts the first fuel source communication with the dual fuel engine when in the second position and wherein the fuel lockout apparatus is configured to prevent the second fuel source from coupling to the second fuel line while the mechanical fuel valve is in the first position and permit the second fuel source to couple to the second fuel line while the mechanical fuel valve is in the second position, as called for in claim 1 of U.S. Patent No. 10,221,780.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, the fuel lockout apparatus prevents actuation of the mechanical fuel valve to the first position when the second fuel source communicates with the dual fuel engine, as called for in claim 2 of U.S. Patent No. 10,221,780.

c. Dependent claim 6 by specifically including all the aforementioned elements of claim 1 and, in addition, the mechanical fuel valve and the fuel lockout apparatus operate together to ensure that fuel from the first fuel source and fuel from the second fuel source are not simultaneously delivered to the dual fuel engine, as called for in claim 6 of U.S. Patent No. 10,221,780.

d. Dependent claim 7 by specifically including all the aforementioned elements of claim 6 and, in addition, the first fuel source provides liquid fuel from a liquid fuel tank to the dual fuel engine and the second fuel source provides gaseous fuel from a pressurized fuel container to the dual fuel engine, as called for in claim 7 of U.S. Patent No. 10,221,780.

e. Independent claim 8 by specifically including a mechanical fuel lockout switch for an internal combustion engine, the mechanical fuel lockout being assembled by providing an internal combustion engine configured to operate on a fuel from a first fuel source and a different fuel from a second fuel source, coupling a mechanical fuel valve to the internal combustion engine

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actuateable between a first position and a second position to selectively control fuel flow to the internal combustion engine from the first fuel source through a first fuel line and the second fuel source through a second fuel line, and coupling a fuel lockout apparatus to the mechanical fuel valve, wherein the fuel lockout apparatus prevents actuation of the mechanical fuel valve to the first position when the second fuel source is coupled to the internal combustion engine, as called for in claim 8 of U.S. Patent No. 10,221,780.

f. Dependent claim 9 by specifically including all the aforementioned elements of claim 8 and, in addition, the fuel lockout apparatus is further configured to prevent coupling of the second fuel source to the second fuel line while the mechanical fuel valve is in the first position and to permit coupling of the second fuel source to the second fuel line while the mechanical fuel valve is in the second position, as called for in claim 9 of U.S. Patent No. 10,221,780.

g. Dependent claim 11 by specifically including all the aforementioned elements of claim 8 and, in addition, the mechanical fuel lockout switch is assembled by coupling a fuel regulator system to the second fuel source to reduce fuel pressure therefrom and deliver fuel to the second fuel line at a pressure required for operation of the internal combustion engine, as called for in claim 11 of U.S. Patent No. 10,221,780.

h. Dependent claim 13 by specifically including all the aforementioned elements of claim 11 and, in addition, the mechanical fuel lockout switch is assembled by coupling one end of a quick-disconnect hose coupling to an inlet on the internal combustion engine for the second fuel source and coupling a mating end of the quick-disconnect hose coupling to an outlet of the fuel regulator system, as called for in claim 13 of U.S. Patent No. 10,221,780.

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i. Dependent claim 14 by specifically including all the aforementioned elements of claim 8 and, in addition, the mechanical fuel lockout switch is assembled by providing gasoline in a liquid fuel tank as the first fuel source and LPG in a pressurized fuel container as the second fuel source, as called for in claim 14 of U.S. Patent No. 10,221,780.

j. Independent claim 15 by specifically including a mechanical fuel lockout switch for a dual fuel engine having a mechanical fuel valve actuateable between a first position and a second position to selectively control fuel flow to the dual fuel engine from a first fuel source through a first fuel line and a second fuel source through a second fuel line and a fuel lockout apparatus coupled to the mechanical fuel valve, wherein the mechanical fuel lockout switch communicates the first fuel source to the dual fuel engine and prevents communication between the second fuel source and the dual fuel engine when the mechanical fuel valve is in the first position and communicates the second fuel source to the dual fuel engine and interrupts the first fuel source communication with the dual fuel engine when in the second position and wherein the fuel lockout apparatus prevents actuation of the mechanical fuel valve to the first position when the second fuel source communicates with the dual fuel engine.

Therefore, each of the foregoing Firman generator models listed in Paragraph 20(a)-(h) infringes at least claims 1, 2, 6-9, 11, and 13-15 of U.S. Patent No. 10,221,780.

22. Champion has no adequate remedy at law against Firman's acts of infringement and will suffer irreparable harm unless Firman is preliminarily and permanently enjoined from its infringement of U.S. Patent No. 10,221,780.

23. Upon information and belief, Firman's infringement has been willful, deliberate, and with knowledge of Champion's rights under U.S. Patent No. 10,221,780.

24. Firman's President, Montgomery, had actual knowledge of Champion's patents, Champion's patent applications, inventions, and product development (together, the

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"Champion IP") as of the date of his departure from Champion in December 2014. Subsequent to Montgomery's departure, he was hired by Firman. Upon information and belief, Montgomery disclosed the Champion IP to Firman, and thereafter, Firman monitored the Champion IP, including Champion's published patent applications.

25. Upon information and belief, Firman had actual knowledge of the Champion IP, including Champion's published patent applications.

26. Upon information and belief, at least as of September 6, 2019, the date Champion sent Firman a cease and desist letter demanding the cessation of infringement by Firman of the Champion IP, Firman continued to monitor the Champion IP, including Champion's published patent applications, and had actual notice of all of Champion's patents and published patent applications as of their publication dates.

27. Firman, by way of its infringing activity, has caused and continues to cause Champion to suffer damages in an amount to be determined at trial.

COUNT II: INFRINGEMENT OF U.S. PATENT NO. 10,393,034

28. Paragraphs 1 through 24 are incorporated by reference as if fully set forth herein.

29. U.S. Patent No. 10,393,034 is titled "FUEL SYSTEM FOR A MULTI-FUEL INTERNAL COMBUSTION ENGINE." U.S. Patent No. 10,393,034 was duly and legally issued on August 27, 2019. A true and correct copy of U.S. Patent No. 10,393,034 is attached as Exhibit B.

30. Champion is the lawful assignee of the entire right, title, and interest in and to U.S. Patent No. 10,393,034 and possesses all rights of recovery under the patent, including the right to recover damages for past infringement.

31. Champion has acquired and inspected the following Firman generator models that Firman has been and is making, using, selling, or offering for sale within the United States, or importing into the United States:

a. Model H03651, a dual fuel portable generator;

b. Model H03652, a dual fuel portable generator;

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c. Model H05751, a dual fuel portable generator;

d. Model H05752, a dual fuel portable generator;

e. Model H05753, a dual fuel portable generator;

f. Model H07552, a dual fuel portable generator;

g. Model H07553, a dual fuel portable generator;

h. Model H08051, a dual fuel portable generator;

i. Model H08053, a dual fuel portable generator;

j. Model T04073, a tri fuel portable generator;

k. Model T07571, a tri fuel portable generator;

l. Model T07573, a tri fuel portable generator;

m. Model T08071, a tri fuel portable generator;

n. Model T08072, a tri fuel portable generator;

o. Model T09275, a tri fuel portable generator;

p. Model T09371, a tri fuel portable generator;

q. Model WH03562OF, a dual fuel open frame inverter portable generator; and

r. Model WH03662OF, a dual fuel open frame inverter portable generator.

32. Upon acquisition, disassembly as needed, review of owner's manuals and electrical schematics, and inspection, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 2, 5, 7-9, 11, 13, 14, 18, and 19 of U.S. Patent No. 10,393,034. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a multi-fuel engine having an engine operable on a liquid fuel and a gaseous fuel, a carburetor attached to an intake of the engine to mix air and fuel and connect a liquid fuel source to the intake, the carburetor comprising a float bowl, a liquid cutoff solenoid coupled to the carburetor to open and close a liquid fuel path to the engine downstream from the float bowl, a gaseous cutoff coupled to open and close a gaseous fuel source to the engine, and a switch selectively coupling a

power source to the liquid cutoff solenoid to open and close the liquid fuel path, as called for in claim 1 of U.S. Patent No. 10,393,034.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, the liquid cutoff solenoid is positioned on the liquid fuel path, which extends from the float bowl to a throat of the carburetor, to open and close the liquid fuel path and the gaseous cutoff solenoid couples the gaseous fuel source to the intake to control flow of the gaseous fuel to the engine, as called for in claim 2 of U.S. Patent No. 10,393,034.

c. Dependent claim 5 by specifically including all the aforementioned elements of claim 1 and, in addition, the engine is a dual fuel engine that operates on gasoline from the liquid fuel source and LPG from the gaseous fuel source, as called for in claim 5 of U.S. Patent No. 10,393,034.

d. Dependent claim 7 by specifically including all the aforementioned elements of claim 1 and, in addition, the liquid cutoff solenoid is selectively operable to cut off fuel flow from the float bowl to a nozzle in a venturi of the carburetor upstream from a throttle for the engine, as called for in claim 7 of U.S. Patent No. 10,393,034.

e. Dependent claim 8 by specifically including all the aforementioned elements of claim 1 and, in addition, the carburetor connects the gaseous fuel source to the intake, as called for in claim 8 of U.S. Patent No. 10,393,034.

f. Dependent claim 9 by specifically including all the aforementioned elements of claim 1 and, in addition, a liquid fuel valve positioned on a liquid fuel line coupling the liquid fuel source to the carburetor to open and close the liquid fuel source to the engine, as called for in claim 9 of U.S. Patent No. 10,393,034.

g. Independent claim 11 by specifically including a multi-fuel generator and fuel delivery system having a multi-fuel internal combustion engine

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configured to operate on a liquid fuel supplied from a liquid fuel source through a liquid fuel line and a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line, an alternator driven by the multi-fuel internal combustion engine, a fuel regulator system including a primary pressure regulator coupled to a service valve of the pressurized fuel source to regulate fuel supplied from the pressurized fuel source to a reduced pressure and a secondary pressure regulator coupled to the primary pressure regulator to regulate fuel supplied from the primary pressure regulator to a desired pressure for delivery through the gaseous fuel line to operate the engine, and an electro-mechanical valve system coupled to the engine and operated by an electrical switch powered by one of the alternator, a battery, and a magneto that controls fuel flow to the engine from the liquid fuel source and the pressurized fuel source, as called for in claim 11 of U.S. Patent No. 10,393,034.

h. Dependent claim 13 by specifically including all the aforementioned elements of claim 11 and, in addition, the electro-mechanical valve system is configured to prevent simultaneous delivery of the liquid fuel and the gaseous fuel to the engine, as called for in claim 13 of U.S. Patent No. 10,393,034.

i. Dependent claim 14 by specifically including all the aforementioned elements of claim 11 and, in addition, the electro-mechanical valve system has the electro-mechanical valve system and a gaseous fuel cutoff solenoid coupled to the gaseous fuel line to control flow of the gaseous fuel to the engine, as called for in claim 14 of U.S. Patent No. 10,393,034.

j. Independent claim 18 by specifically including a multi-fuel internal combustion engine having an engine operable on liquid fuel supplied through a liquid fuel line from a liquid fuel source and gaseous fuel supplied through a gaseous fuel line from a pressurized fuel source, a carburetor

coupled to an intake of the engine to mix air and fuel and connect to the liquid fuel line and the gaseous fuel line, a carburetor cutoff solenoid coupled to control fuel flow within the carburetor from the liquid fuel line and selectively engage engine operation on liquid fuel, and a gaseous fuel valve coupled to control fuel flow through the gaseous fuel line and selectively engage engine operation on gaseous fuel, as called for in claim 18 of U.S. Patent No. 10,393,034.

k. Dependent claim 19 by specifically including all the aforementioned elements of claim 18 and, in addition, the gaseous fuel valve comprises a gaseous fuel cutoff solenoid, as called for in claim 19 of U.S. Patent No. 10,393,034.

Therefore, each of the foregoing Firman generator models listed in Paragraph 31(a)-(r) infringes at least claims 1, 2, 5, 7-9, 11, 13, 14, 18, and 19 of U.S. Patent No. 10,393,034.

33. Champion has also acquired and inspected the following Firman generator models that Firman has been and is making, using, selling, or offering for sale within the United States, or importing into the United States:

a. Model WH02942, a dual fuel inverter portable generator;

b. Model WH03041, a dual fuel inverter portable generator;

c. Model WH03042, a dual fuel inverter portable generator;

d. Model WH03242, a dual fuel inverter portable generator; and

e. Model WH03344, a dual fuel inverter portable generator.

34. Upon acquisition, disassembly as needed, review of owner's manuals and electrical schematics, and inspection, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 2, 5-9, 11, 13, 14, 18, 19, and 24 of U.S. Patent No. 10,393,034. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a multi-fuel engine having an engine operable on a liquid fuel and a gaseous fuel, a carburetor attached to

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an intake of the engine to mix air and fuel and connect a liquid fuel source to the intake, the carburetor comprising a float bowl, a liquid cutoff solenoid coupled to the carburetor to open and close a liquid fuel path to the engine downstream from the float bowl, a gaseous cutoff coupled to open and close a gaseous fuel source to the engine, and a switch selectively coupling a power source to the liquid cutoff solenoid to open and close the liquid fuel path, as called for in claim 1 of U.S. Patent No. 10,393,034.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, the liquid cutoff solenoid is positioned on the liquid fuel path, which extends from the float bowl to a throat of the carburetor, to open and close the liquid fuel path and the gaseous cutoff solenoid couples the gaseous fuel source to the intake to control flow of the gaseous fuel to the engine, as called for in claim 2 of U.S. Patent No. 10,393,034.

c. Dependent claim 5 by specifically including all the aforementioned elements of claim 1 and, in addition, the engine is a dual fuel engine that operates on gasoline from the liquid fuel source and LPG from the gaseous fuel source, as called for in claim 5 of U.S. Patent No. 10,393,034.

d. Dependent claim 6 by specifically including all the aforementioned elements of claim 1 and, in addition, activating the gaseous cutoff simultaneously activates the liquid cutoff solenoid, as called for in claim 6 of U.S. Patent No. 10,393,034.

e. Dependent claim 7 by specifically including all the aforementioned elements of claim 1 and, in addition, the liquid cutoff solenoid is selectively operable to cut off fuel flow from the float bowl to a nozzle in a venturi of the carburetor upstream from a throttle for the engine, as called for in claim 7 of U.S. Patent No. 10,393,034.

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f. Dependent claim 8 by specifically including all the aforementioned elements of claim 1 and, in addition, the carburetor connects the gaseous fuel source to the intake, as called for in claim 8 of U.S. Patent No. 10,393,034.

g. Dependent claim 9 by specifically including all the aforementioned elements of claim 1 and, in addition, a liquid fuel valve positioned on a liquid fuel line coupling the liquid fuel source to the carburetor to open and close the liquid fuel source to the engine, as called for in claim 9 of U.S. Patent No. 10,393,034.

h. Independent claim 11 by specifically including a multi-fuel generator and fuel delivery system having a multi-fuel internal combustion engine configured to operate on a liquid fuel supplied from a liquid fuel source through a liquid fuel line and a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line, an alternator driven by the multi-fuel internal combustion engine, a fuel regulator system including a primary pressure regulator coupled to a service valve of the pressurized fuel source to regulate fuel supplied from the pressurized fuel source to a reduced pressure and a secondary pressure regulator coupled to the primary pressure regulator to regulate fuel supplied from the primary pressure regulator to a desired pressure for delivery through the gaseous fuel line to operate the engine, and an electro-mechanical valve system coupled to the engine and operated by an electrical switch powered by one of the alternator, a battery, and a magneto that controls fuel flow to the engine from the liquid fuel source and the pressurized fuel source, as called for in claim 11 of U.S. Patent No. 10,393,034.

i. Dependent claim 13 by specifically including all the aforementioned elements of claim 11 and, in addition, the electro-mechanical valve system is configured to prevent simultaneous delivery of the liquid fuel and the

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gaseous fuel to the engine, as called for in claim 13 of U.S. Patent No. 10,393,034.

j. Dependent claim 14 by specifically including all the aforementioned elements of claim 11 and, in addition, the electro-mechanical valve system has the electro-mechanical valve system and a gaseous fuel cutoff solenoid coupled to the gaseous fuel line to control flow of the gaseous fuel to the engine, as called for in claim 14 of U.S. Patent No. 10,393,034.

k. Independent claim 18 by specifically including a multi-fuel internal combustion engine having an engine operable on liquid fuel supplied through a liquid fuel line from a liquid fuel source and gaseous fuel supplied through a gaseous fuel line from a pressurized fuel source, a carburetor coupled to an intake of the engine to mix air and fuel and connect to the liquid fuel line and the gaseous fuel line, a carburetor cutoff solenoid coupled to control fuel flow within the carburetor from the liquid fuel line and selectively engage engine operation on liquid fuel, and a gaseous fuel valve coupled to control fuel flow through the gaseous fuel line and selectively engage engine operation on gaseous fuel, as called for in claim 18 of U.S. Patent No. 10,393,034.

l. Dependent claim 19 by specifically including all the aforementioned elements of claim 18 and, in addition, the gaseous fuel valve comprises a gaseous fuel cutoff solenoid, as called for in claim 19 of U.S. Patent No. 10,393,034.

m. Dependent claim 24 by specifically including all the aforementioned elements of claim 18 and, in addition, an alternator driven by the engine to form a generator and a fuel regulator system located off-board the generator and having a primary pressure regulator coupled to a service valve of the pressurized fuel source to regulate the fuel supplied from the pressurized fuel source to a reduced pressure and a secondary pressure regulator coupled

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to the primary pressure regulator to regulate the gaseous fuel supplied from the primary pressure regulator to a desired pressure for delivery through the gaseous fuel line to operate the engine, as called for in claim 24 of U.S. Patent No. 10,393,034.

Therefore, each of the foregoing Firman generator models listed in Paragraph 33(a)-(e) infringes at least claims 1, 2, 5-9, 11, 13, 14, 18, 19, and 24 of U.S. Patent No. 10,393,034.

35. Upon information and belief, Firman has been and is now making, using, selling, or offering for sale within the United States, or importing into the United States, the following additional generator models:

a. Model H03654, a dual fuel portable generator;

b. Model H05754, a dual fuel portable generator;

c. Model H07554, a dual fuel portable generator;

d. Model H08052, a dual fuel portable generator; and

e. Model T07571F, a refurbished tri fuel portable generator.

36. Upon review of images, owner's manuals, and electrical schematics of the foregoing Firman generator models and comparisons of the images, owner's manuals, and electrical schematics of the foregoing Firman generator models to those of the Firman generator models listed in Paragraphs 31 and 33, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 2, 5, 7-9, 11, 13, 14, 18, and 19 of U.S. Patent No. 10,393,034. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a multi-fuel engine having an engine operable on a liquid fuel and a gaseous fuel, a carburetor attached to an intake of the engine to mix air and fuel and connect a liquid fuel source to the intake, the carburetor comprising a float bowl, a liquid cutoff solenoid coupled to the carburetor to open and close a liquid fuel path to the engine downstream from the float bowl, a gaseous cutoff coupled to open and close a gaseous fuel source to the engine, and a switch selectively coupling a

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power source to the liquid cutoff solenoid to open and close the liquid fuel path, as called for in claim 1 of U.S. Patent No. 10,393,034.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, the liquid cutoff solenoid is positioned on the liquid fuel path, which extends from the float bowl to a throat of the carburetor, to open and close the liquid fuel path and the gaseous cutoff solenoid couples the gaseous fuel source to the intake to control flow of the gaseous fuel to the engine, as called for in claim 2 of U.S. Patent No. 10,393,034.

c. Dependent claim 5 by specifically including all the aforementioned elements of claim 1 and, in addition, the engine is a dual fuel engine that operates on gasoline from the liquid fuel source and LPG from the gaseous fuel source, as called for in claim 5 of U.S. Patent No. 10,393,034.

d. Dependent claim 7 by specifically including all the aforementioned elements of claim 1 and, in addition, the liquid cutoff solenoid is selectively operable to cut off fuel flow from the float bowl to a nozzle in a venturi of the carburetor upstream from a throttle for the engine, as called for in claim 7 of U.S. Patent No. 10,393,034.

e. Dependent claim 8 by specifically including all the aforementioned elements of claim 1 and, in addition, the carburetor connects the gaseous fuel source to the intake, as called for in claim 8 of U.S. Patent No. 10,393,034.

f. Dependent claim 9 by specifically including all the aforementioned elements of claim 1 and, in addition, a liquid fuel valve positioned on a liquid fuel line coupling the liquid fuel source to the carburetor to open and close the liquid fuel source to the engine, as called for in claim 9 of U.S. Patent No. 10,393,034.

g. Independent claim 11 by specifically including a multi-fuel generator and fuel delivery system having a multi-fuel internal combustion engine

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configured to operate on a liquid fuel supplied from a liquid fuel source through a liquid fuel line and a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line, an alternator driven by the multi-fuel internal combustion engine, a fuel regulator system including a primary pressure regulator coupled to a service valve of the pressurized fuel source to regulate fuel supplied from the pressurized fuel source to a reduced pressure and a secondary pressure regulator coupled to the primary pressure regulator to regulate fuel supplied from the primary pressure regulator to a desired pressure for delivery through the gaseous fuel line to operate the engine, and an electro-mechanical valve system coupled to the engine and operated by an electrical switch powered by one of the alternator, a battery, and a magneto that controls fuel flow to the engine from the liquid fuel source and the pressurized fuel source, as called for in claim 11 of U.S. Patent No. 10,393,034.

h. Dependent claim 13 by specifically including all the aforementioned elements of claim 11 and, in addition, the electro-mechanical valve system is configured to prevent simultaneous delivery of the liquid fuel and the gaseous fuel to the engine, as called for in claim 13 of U.S. Patent No. 10,393,034.

i. Dependent claim 14 by specifically including all the aforementioned elements of claim 11 and, in addition, the electro-mechanical valve system has the electro-mechanical valve system and a gaseous fuel cutoff solenoid coupled to the gaseous fuel line to control flow of the gaseous fuel to the engine, as called for in claim 14 of U.S. Patent No. 10,393,034.

j. Independent claim 18 by specifically including a multi-fuel internal combustion engine having an engine operable on liquid fuel supplied through a liquid fuel line from a liquid fuel source and gaseous fuel supplied through a gaseous fuel line from a pressurized fuel source, a carburetor

coupled to an intake of the engine to mix air and fuel and connect to the liquid fuel line and the gaseous fuel line, a carburetor cutoff solenoid coupled to control fuel flow within the carburetor from the liquid fuel line and selectively engage engine operation on liquid fuel, and a gaseous fuel valve coupled to control fuel flow through the gaseous fuel line and selectively engage engine operation on gaseous fuel, as called for in claim 18 of U.S. Patent No. 10,393,034.

k. Dependent claim 19 by specifically including all the aforementioned elements of claim 18 and, in addition, the gaseous fuel valve comprises a gaseous fuel cutoff solenoid, as called for in claim 19 of U.S. Patent No. 10,393,034.

Therefore, each of the foregoing Firman generator models listed in Paragraph 35(a)-(e) infringes at least claims 1, 2, 5, 7-9, 11, 13, 14, 18, and 19 of U.S. Patent No. 10,393,034.

37. Upon information and belief, Firman has been and is now making, using, selling, or offering for sale within the United States, or importing into the United States, the following additional generator models:

a. Model WH02942F, a refurbished dual fuel inverter portable generator;

b. Model WH03242F, a refurbished dual fuel inverter portable generator; and

c. Model WH03342, a dual fuel inverter portable generator.

38. Upon review of images, owner's manuals, and electrical schematics of the foregoing Firman generator models and comparisons of the images, owner's manuals, and electrical schematics of the foregoing Firman generator models to those of the Firman generator models listed in Paragraphs 31 and 33, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 2, 5-9, 11, 13, 14, 18, 19, and 24 of U.S. Patent No. 10,393,034. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a multi-fuel engine having an engine operable on a liquid fuel and a gaseous fuel, a carburetor attached to

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an intake of the engine to mix air and fuel and connect a liquid fuel source to the intake, the carburetor comprising a float bowl, a liquid cutoff solenoid coupled to the carburetor to open and close a liquid fuel path to the engine downstream from the float bowl, a gaseous cutoff coupled to open and close a gaseous fuel source to the engine, and a switch selectively coupling a power source to the liquid cutoff solenoid to open and close the liquid fuel path, as called for in claim 1 of U.S. Patent No. 10,393,034.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, the liquid cutoff solenoid is positioned on the liquid fuel path, which extends from the float bowl to a throat of the carburetor, to open and close the liquid fuel path and the gaseous cutoff solenoid couples the gaseous fuel source to the intake to control flow of the gaseous fuel to the engine, as called for in claim 2 of U.S. Patent No. 10,393,034.

c. Dependent claim 5 by specifically including all the aforementioned elements of claim 1 and, in addition, the engine is a dual fuel engine that operates on gasoline from the liquid fuel source and LPG from the gaseous fuel source, as called for in claim 5 of U.S. Patent No. 10,393,034.

d. Dependent claim 6 by specifically including all the aforementioned elements of claim 1 and, in addition, activating the gaseous cutoff simultaneously activates the liquid cutoff solenoid, as called for in claim 6 of U.S. Patent No. 10,393,034.

e. Dependent claim 7 by specifically including all the aforementioned elements of claim 1 and, in addition, the liquid cutoff solenoid is selectively operable to cut off fuel flow from the float bowl to a nozzle in a venturi of the carburetor upstream from a throttle for the engine, as called for in claim 7 of U.S. Patent No. 10,393,034.

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f. Dependent claim 8 by specifically including all the aforementioned elements of claim 1 and, in addition, the carburetor connects the gaseous fuel source to the intake, as called for in claim 8 of U.S. Patent No. 10,393,034.

g. Dependent claim 9 by specifically including all the aforementioned elements of claim 1 and, in addition, a liquid fuel valve positioned on a liquid fuel line coupling the liquid fuel source to the carburetor to open and close the liquid fuel source to the engine, as called for in claim 9 of U.S. Patent No. 10,393,034.

h. Independent claim 11 by specifically including a multi-fuel generator and fuel delivery system having a multi-fuel internal combustion engine configured to operate on a liquid fuel supplied from a liquid fuel source through a liquid fuel line and a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line, an alternator driven by the multi-fuel internal combustion engine, a fuel regulator system including a primary pressure regulator coupled to a service valve of the pressurized fuel source to regulate fuel supplied from the pressurized fuel source to a reduced pressure and a secondary pressure regulator coupled to the primary pressure regulator to regulate fuel supplied from the primary pressure regulator to a desired pressure for delivery through the gaseous fuel line to operate the engine, and an electro-mechanical valve system coupled to the engine and operated by an electrical switch powered by one of the alternator, a battery, and a magneto that controls fuel flow to the engine from the liquid fuel source and the pressurized fuel source, as called for in claim 11 of U.S. Patent No. 10,393,034.

i. Dependent claim 13 by specifically including all the aforementioned elements of claim 11 and, in addition, the electro-mechanical valve system is configured to prevent simultaneous delivery of the liquid fuel and the

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gaseous fuel to the engine, as called for in claim 13 of U.S. Patent No. 10,393,034.

j. Dependent claim 14 by specifically including all the aforementioned elements of claim 11 and, in addition, the electro-mechanical valve system has the electro-mechanical valve system and a gaseous fuel cutoff solenoid coupled to the gaseous fuel line to control flow of the gaseous fuel to the engine, as called for in claim 14 of U.S. Patent No. 10,393,034.

k. Independent claim 18 by specifically including a multi-fuel internal combustion engine having an engine operable on liquid fuel supplied through a liquid fuel line from a liquid fuel source and gaseous fuel supplied through a gaseous fuel line from a pressurized fuel source, a carburetor coupled to an intake of the engine to mix air and fuel and connect to the liquid fuel line and the gaseous fuel line, a carburetor cutoff solenoid coupled to control fuel flow within the carburetor from the liquid fuel line and selectively engage engine operation on liquid fuel, and a gaseous fuel valve coupled to control fuel flow through the gaseous fuel line and selectively engage engine operation on gaseous fuel, as called for in claim 18 of U.S. Patent No. 10,393,034.

l. Dependent claim 19 by specifically including all the aforementioned elements of claim 18 and, in addition, the gaseous fuel valve comprises a gaseous fuel cutoff solenoid, as called for in claim 19 of U.S. Patent No. 10,393,034.

m. Dependent claim 24 by specifically including all the aforementioned elements of claim 18 and, in addition, an alternator driven by the engine to form a generator and a fuel regulator system located off-board the generator and having a primary pressure regulator coupled to a service valve of the pressurized fuel source to regulate the fuel supplied from the pressurized fuel source to a reduced pressure and a secondary pressure regulator coupled

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to the primary pressure regulator to regulate the gaseous fuel supplied from the primary pressure regulator to a desired pressure for delivery through the gaseous fuel line to operate the engine, as called for in claim 24 of U.S. Patent No. 10,393,034.

Therefore, each of the foregoing Firman generator models listed in Paragraph 37(a)-(c) infringes at least claims 1, 2, 5-9, 11, 13, 14, 18, 19, and 24 of U.S. Patent No. 10,393,034.

39. Champion has no adequate remedy at law against Firman's acts of infringement and will suffer irreparable harm unless Firman is preliminarily and permanently enjoined from its infringement of U.S. Patent No. 10,393,034.

40. Upon information and belief, Firman's infringement has been willful, deliberate, and with knowledge of Champion's rights under U.S. Patent No. 10,393,034.

41. Firman, by way of its infringing activity, has caused and continues to cause Champion to suffer damages in an amount to be determined at trial.

COUNT III: INFRINGEMENT OF U.S. PATENT NO. 10,598,101

42. Paragraphs 1 through 41 are incorporated by reference as if fully set forth herein.

43. U.S. Patent No. 10,598,101 is titled "DUAL FUEL SELECTOR SWITCH." U.S. Patent No. 10,598,101 was duly and legally issued on March 24, 2020. A true and correct copy of U.S. Patent No. 10,598,101 is attached as Exhibit C.

44. Champion is the lawful assignee of the entire right, title, and interest in and to U.S. Patent No. 10,598,101 and possesses all rights of recovery under the patent, including the right to recover damages for past infringement.

45. Champion has acquired and inspected the following Firman generator models that Firman has been and is making, using, selling, or offering for sale within the United States, or importing into the United States:

a. Model H03651, a dual fuel portable generator;

b. Model H03652, a dual fuel portable generator;

c. Model H05751, a dual fuel portable generator;

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d. Model H05752, a dual fuel portable generator;

e. Model H05753, a dual fuel portable generator;

f. Model H07552, a dual fuel portable generator;

g. Model H07553, a dual fuel portable generator;

h. Model H08051, a dual fuel portable generator;

i. Model H08053, a dual fuel portable generator;

j. Model T04073, a tri fuel portable generator;

k. Model T07571, a tri fuel portable generator;

l. Model T07573, a tri fuel portable generator;

m. Model T08071, a tri fuel portable generator;

n. Model T08072, a tri fuel portable generator;

o. Model T09275, a tri fuel portable generator;

p. Model T09371, a tri fuel portable generator;

q. Model WH03562OF, a dual fuel open frame inverter portable generator; and

r. Model WH03662OF, a dual fuel open frame inverter portable generator.

46. Upon acquisition, disassembly as needed, review of owner's manuals and electrical schematics, and inspection, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claim 18 of U.S. Patent No. 10,598,101. Each of the foregoing Firman generator models infringes independent claim 18 by specifically including a fuel selector for use with a dual fuel generator, the fuel selector having a valve assembly fluidly connected to each of a first fuel source and a second fuel source, being operable to selectively control a first fuel flow and a second fuel flow from the first fuel source and the second fuel source, respectively, to an engine of the dual fuel generator, and including two fuel inputs, with a first fuel input connected to the first fuel source and a second fuel input connected to the second fuel source, two fuel outputs supplying fuel from only one of the first fuel source or the second fuel source, a first fuel valve having open and closed positions to selectively control the first fuel flow to the engine; and a second fuel valve having open and closed positions to selectively control the

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second fuel flow to the engine; and a selector switch positioned on the valve assembly to allow a user to manually select one of the first fuel flow and the second fuel flow, as called for in claim 18 of U.S. Patent No. 10,598,101. Therefore, each of the foregoing Firman generator models listed in Paragraph 45(a)-(r) infringes at least claim 18 of U.S. Patent No. 10,598,101.

47. Champion has also acquired and inspected the following Firman generator models that Firman has been and is making, using, selling, or offering for sale within the United States, or importing into the United States:

a. Model WH02942, a dual fuel inverter portable generator;

b. Model WH03041, a dual fuel inverter portable generator;

c. Model WH03042, a dual fuel inverter portable generator;

d. Model WH03242, a dual fuel inverter portable generator; and

e. Model WH03344, a dual fuel inverter portable generator.

48. Upon acquisition, disassembly as needed, review of owner's manuals and electrical schematics, and inspection, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 17 and 18 of U.S. Patent No. 10,598,101. Each of the foregoing Firman generator models infringes:

a. Independent claim 17 by specifically including a fuel selector of a dual fuel generator having a valve assembly positioned on or adjacent the selector switch and fluidly connected to each of a first fuel source and a second fuel source, the valve assembly being operable to selectively control a first fuel flow and a second fuel flow from the first fuel source and the second fuel source, respectively, to an engine of the dual fuel generator; a selector switch with a first fuel mode and a second fuel mode; a solenoid switch having open and closed positions; and a fuel solenoid having open and closed positions; wherein, when the selector switch is in the first fuel mode, the solenoid switch and the fuel solenoid are in the closed positions and, when the selector switch is in the second fuel mode, the solenoid switch and the fuel

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solenoid are in the open positions, wherein the selector switch triggers the solenoid switch when changed from the second fuel mode to the first fuel mode, so as to cause the solenoid switch and the fuel solenoid to operate in the closed positions, and wherein positioning of the selector switch in the first fuel mode and the second fuel mode enables a selection of one of the first fuel flow and the second fuel flow, as called for in claim 17 of U.S. Patent No. 10,598,101.

b. Independent claim 18 by specifically including a fuel selector for use with a dual fuel generator, the fuel selector having a valve assembly fluidly connected to each of a first fuel source and a second fuel source, being operable to selectively control a first fuel flow and a second fuel flow from the first fuel source and the second fuel source, respectively, to an engine of the dual fuel generator, and including two fuel inputs, with a first fuel input connected to the first fuel source and a second fuel input connected to the second fuel source, two fuel outputs supplying fuel from only one of the first fuel source or the second fuel source, a first fuel valve having open and closed positions to selectively control the first fuel flow to the engine; and a second fuel valve having open and closed positions to selectively control the second fuel flow to the engine; and a selector switch positioned on the valve assembly to allow a user to manually select one of the first fuel flow and the second fuel flow, as called for in claim 18 of U.S. Patent No. 10,598,101.

Therefore, each of the foregoing Firman generator models listed in Paragraph 47(a)-(e) infringes at least claims 17 and 18 of U.S. Patent No. 10,598,101.

49. Upon information and belief, Firman has been and is now making, using, selling, or offering for sale within the United States, or importing into the United States, the following additional generator models:

a. Model H03654, a dual fuel portable generator;

b. Model H05754, a dual fuel portable generator;

c. Model H07554, a dual fuel portable generator;

d. Model H08052, a dual fuel portable generator; and

e. Model T07571F, a refurbished tri fuel portable generator.

50. Upon review of images, owner's manuals, and electrical schematics of the foregoing Firman generator models and comparisons of the images, owner's manuals, and electrical schematics of the foregoing Firman generator models to those of the Firman generator models listed in Paragraphs 45 and 47, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claim 18 of U.S. Patent No. 10,598,101. Each of the foregoing Firman generator models infringes independent claim 18 by specifically including a fuel selector for use with a dual fuel generator, the fuel selector having a valve assembly fluidly connected to each of a first fuel source and a second fuel source, being operable to selectively control a first fuel flow and a second fuel flow from the first fuel source and the second fuel source, respectively, to an engine of the dual fuel generator, and including two fuel inputs, with a first fuel input connected to the first fuel source and a second fuel input connected to the second fuel source, two fuel outputs supplying fuel from only one of the first fuel source or the second fuel source, a first fuel valve having open and closed positions to selectively control the first fuel flow to the engine; and a second fuel valve having open and closed positions to selectively control the second fuel flow to the engine; and a selector switch positioned on the valve assembly to allow a user to manually select one of the first fuel flow and the second fuel flow, as called for in claim 18 of U.S. Patent No. 10,598,101. Therefore, each of the foregoing Firman generator models listed in Paragraph 49(a)-(e) infringes at least claim 18 of U.S. Patent No. 10,598,101.

51. Upon information and belief, Firman also has been and is now making, using, selling, or offering for sale within the United States, or importing into the United States, the following additional generator models:

a. Model WH02942F, a refurbished dual fuel inverter portable generator;

b. Model WH03242F, a refurbished dual fuel inverter portable generator; and

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c. Model WH03342, a dual fuel inverter portable generator.

52. Upon review of images, owner's manuals, and electrical schematics of the foregoing Firman generator models and comparisons of the images, owner's manuals, and electrical schematics of the foregoing Firman generator models to those of the Firman generator models listed in Paragraphs 45 and 47, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 17 and 18 of U.S. Patent No. 10,598,101. Each of the foregoing Firman generator models infringes:

a. Independent claim 17 by specifically including a fuel selector of a dual fuel generator having a valve assembly positioned on or adjacent the selector switch and fluidly connected to each of a first fuel source and a second fuel source, the valve assembly being operable to selectively control a first fuel flow and a second fuel flow from the first fuel source and the second fuel source, respectively, to an engine of the dual fuel generator; a selector switch with a first fuel mode and a second fuel mode; a solenoid switch having open and closed positions; and a fuel solenoid having open and closed positions; wherein, when the selector switch is in the first fuel mode, the solenoid switch and the fuel solenoid are in the closed positions and, when the selector switch is in the second fuel mode, the solenoid switch and the fuel solenoid are in the open positions, wherein the selector switch triggers the solenoid switch when changed from the second fuel mode to the first fuel mode, so as to cause the solenoid switch and the fuel solenoid to operate in the closed positions, and wherein positioning of the selector switch in the first fuel mode and the second fuel mode enables a selection of one of the first fuel flow and the second fuel flow, as called for in claim 17 of U.S. Patent No. 10,598,101.

b. Independent claim 18 by specifically including a fuel selector for use with a dual fuel generator, the fuel selector having a valve assembly fluidly connected to each of a first fuel source and a second fuel source, being

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operable to selectively control a first fuel flow and a second fuel flow from the first fuel source and the second fuel source, respectively, to an engine of the dual fuel generator, and including two fuel inputs, with a first fuel input connected to the first fuel source and a second fuel input connected to the second fuel source, two fuel outputs supplying fuel from only one of the first fuel source or the second fuel source, a first fuel valve having open and closed positions to selectively control the first fuel flow to the engine; and a second fuel valve having open and closed positions to selectively control the second fuel flow to the engine; and a selector switch positioned on the valve assembly to allow a user to manually select one of the first fuel flow and the second fuel flow, as called for in claim 18 of U.S. Patent No. 10,598,101.

Therefore, each of the foregoing Firman generator models listed in Paragraph 51(a)-(c) infringes at least claims 17 and 18 of U.S. Patent No. 10,598,101.

53. Champion has no adequate remedy at law against Firman's acts of infringement and will suffer irreparable harm unless Firman is preliminarily and permanently enjoined from its infringement of U.S. Patent No. 10,598,101.

54. Upon information and belief, Firman's infringement has been willful, deliberate, and with knowledge of Champion's rights under U.S. Patent No. 10,598,101.

55. Firman, by way of its infringing activity, has caused and continues to cause Champion to suffer damages in an amount to be determined at trial.

COUNT IV: INFRINGEMENT OF U.S. PATENT NO. 10,697,398

56. Paragraphs 1 through 55 are incorporated by reference as if fully set forth herein.

57. U.S. Patent No. 10,697,398 is titled "BATTERYLESS DUAL FUEL ENGINE WITH LIQUID FUEL CUT-OFF." U.S. Patent No. 10,697,398 was duly and legally issued on June 30, 2020. A true and correct copy of U.S. Patent No. 10,697,398 is attached as Exhibit D.

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58. Champion is the lawful assignee of the entire right, title, and interest in and to U.S. Patent No. 10,697,398 and possesses all rights of recovery under the patent, including the right to recover damages for past infringement.

59. Champion has acquired and inspected the following Firman generator models that Firman has been and is making, using, selling, or offering for sale within the United States, or importing into the United States:

a. Model H03651, a dual fuel portable generator;

b. Model H03652, a dual fuel portable generator;

c. Model H05751, a dual fuel portable generator;

d. Model H05752, a dual fuel portable generator;

e. Model H05753, a dual fuel portable generator;

f. Model H07552, a dual fuel portable generator;

g. Model H07553, a dual fuel portable generator;

h. Model H08051, a dual fuel portable generator;

i. Model H08053, a dual fuel portable generator;

j. Model T04073, a tri fuel portable generator;

k. Model T07571, a tri fuel portable generator;

l. Model T07573, a tri fuel portable generator;

m. Model T08071, a tri fuel portable generator;

n. Model T08072, a tri fuel portable generator;

o. Model T09275, a tri fuel portable generator;

p. Model T09371, a tri fuel portable generator;

q. Model WH03562OF, a dual fuel open frame inverter portable generator; and

r. Model WH03662OF, a dual fuel open frame inverter portable generator.

60. Upon acquisition, disassembly as needed, review of owner's manuals and electrical schematics, and inspection, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 3-7, 10, 22, and 57 of U.S. Patent No. 10,697,398. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a dual fuel engine having an engine operable on a gaseous fuel and a liquid fuel, a switch to change operation of an engine between gaseous fuel and liquid fuel, a carburetor attached to an intake of the engine to mix air and fuel and connect to a gaseous fuel source and a liquid fuel source, a liquid fuel valve positioned along a liquid fuel line coupling a liquid fuel source to a carburetor, a gaseous fuel valve positioned along a gaseous fuel line coupling a gaseous fuel source to the carburetor, and a liquid fuel cut-off incorporated into the carburetor to interrupt liquid fuel upon actuation of the switch from liquid to gaseous fuel, as called for in claim 1 of U.S. Patent No. 10,697,398.

b. Dependent claim 3 by specifically including all the aforementioned elements of claim 1 and, in addition, the gaseous fuel is LPG and the liquid fuel is gasoline, as called for in claim 3 of U.S. Patent No. 10,697,398.

c. Dependent claim 4 by specifically including all the aforementioned elements of claim 1 and, in addition, the engine is a pull-start engine having an electrical power generator to supply electrical power, as called for in claim 4 of U.S. Patent No. 10,697,398.

d. Dependent claim 5 by specifically including all the aforementioned elements of claim 4 and, in addition, the switch is an electro-mechanical switch connecting one fuel source to the carburetor and connected to the electrical power generator and the liquid fuel cut-off is a solenoid connected to open and close a fuel path to the pull-start engine in response to reception of electrical power from the switch, as called for in claim 5 of U.S. Patent No. 10,697,398.

e. Dependent claim 6 by specifically including all the aforementioned elements of claim 4 and, in addition, the liquid fuel cut-off is a solenoid valve that operates within the carburetor to control liquid fuel flow to the engine and

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is powered by the electrical power generator, as called for in claim 6 of U.S. Patent No. 10,697,398.

f. Dependent claim 7 by specifically including all the aforementioned elements of claim 6 and, in addition, the switch selectively powers the solenoid valve by controlling electrical connection between the solenoid valve and the electrical power generator, as called for in claim 7 of U.S. Patent No. 10,697,398.

g. Dependent claim 10 by specifically including all the aforementioned elements of claim 6 and, in addition, the electrical power generator comprises a magneto or an alternator coupled to a voltage regulator to provide a regulated voltage to the solenoid valve, as called for in claim 10 of U.S. Patent No. 10,697,398.

h. Dependent claim 22 by specifically including all the aforementioned elements of claim 1 and, in addition, the liquid fuel cut-off is physically attached to an outer surface of the carburetor, as called for in claim 22 of U.S. Patent No. 10,697,398.

i. Independent claim 57 by specifically including a dual fuel engine, the dual fuel engine being assembled by providing an engine operable on a gaseous fuel and a liquid fuel; attaching a carburetor to an intake of the engine, the carburetor having a throat to mix gaseous fuel with air and liquid fuel with air, a float bowl, and a fuel passage extending from the float bowl to the throat to provide liquid fuel; coupling a switch to an engine to change operation of the engine between gaseous fuel and liquid fuel; and attaching a liquid fuel cut-off to a carburetor to close a fuel passage extending from a float bowl of the carburetor to a throat to the carburetor to provide liquid fuel upon actuation of the switch from liquid to gaseous fuel, as called for in claim 57 of U.S. Patent No. 10,697,398.

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Therefore, each of the foregoing Firman generator models listed in Paragraph 59(a)-(r) infringes at least claims 1, 3-7, 10, 22, and 57 of U.S. Patent No. 10,697,398.

61. Champion has also acquired and inspected the following Firman generator models that Firman has been and is making, using, selling, or offering for sale within the United States, or importing into the United States:

a. Model WH02942, a dual fuel inverter portable generator;

b. Model WH03041, a dual fuel inverter portable generator;

c. Model WH03042, a dual fuel inverter portable generator;

d. Model WH03242, a dual fuel inverter portable generator; and

e. Model WH03344, a dual fuel inverter portable generator.

62. Upon acquisition, disassembly as needed, review of owner's manuals and electrical schematics, and inspection, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 3-10, 22, and 57 of U.S. Patent No. 10,697,398. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a dual fuel engine having an engine operable on a gaseous fuel and a liquid fuel, a switch to change operation of an engine between gaseous fuel and liquid fuel, a carburetor attached to an intake of the engine to mix air and fuel and connect to a gaseous fuel source and a liquid fuel source, a liquid fuel valve positioned along a liquid fuel line coupling a liquid fuel source to a carburetor, a gaseous fuel valve positioned along a gaseous fuel line coupling a gaseous fuel source to the carburetor, and a liquid fuel cut-off incorporated into the carburetor to interrupt liquid fuel upon actuation of the switch from liquid to gaseous fuel, as called for in claim 1 of U.S. Patent No. 10,697,398.

b. Dependent claim 3 by specifically including all the aforementioned elements of claim 1 and, in addition, the gaseous fuel is LPG and the liquid fuel is gasoline, as called for in claim 3 of U.S. Patent No. 10,697,398.

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c. Dependent claim 4 by specifically including all the aforementioned elements of claim 1 and, in addition, the engine is a pull-start engine having an electrical power generator to supply electrical power, as called for in claim 4 of U.S. Patent No. 10,697,398.

d. Dependent claim 5 by specifically including all the aforementioned elements of claim 4 and, in addition, the switch is an electro-mechanical switch connecting one fuel source to the carburetor and connected to the electrical power generator and the liquid fuel cut-off is a solenoid connected to open and close a fuel path to the pull-start engine in response to reception of electrical power from the switch, as called for in claim 5 of U.S. Patent No. 10,697,398.

e. Dependent claim 6 by specifically including all the aforementioned elements of claim 4 and, in addition, the liquid fuel cut-off is a solenoid valve that operates within the carburetor to control liquid fuel flow to the engine and is powered by the electrical power generator, as called for in claim 6 of U.S. Patent No. 10,697,398.

f. Dependent claim 7 by specifically including all the aforementioned elements of claim 6 and, in addition, the switch selectively powers the solenoid valve by controlling electrical connection between the solenoid valve and the electrical power generator, as called for in claim 7 of U.S. Patent No. 10,697,398.

g. Dependent claim 8 by specifically including all the aforementioned elements of claim 6 and, in addition, the solenoid valve is normally open to provide liquid fuel to the engine when the solenoid valve is unpowered, as called for in claim 8 of U.S. Patent No. 10,697,398.

h. Dependent claim 9 by specifically including all the aforementioned elements of claim 8 and, in addition, a pull-starter drives the electrical power

generator to power and close the solenoid valve while starting the engine on gaseous fuel, as called for in claim 9 of U.S. Patent No. 10,697,398.

i. Dependent claim 10 by specifically including all the aforementioned elements of claim 6 and, in addition, the electrical power generator comprises a magneto or an alternator coupled to a voltage regulator to provide a regulated voltage to the solenoid valve, as called for in claim 10 of U.S. Patent No. 10,697,398.

j. Dependent claim 22 by specifically including all the aforementioned elements of claim 1 and, in addition, the liquid fuel cut-off is physically attached to an outer surface of the carburetor, as called for in claim 22 of U.S. Patent No. 10,697,398.

k. Independent claim 57 by specifically including a dual fuel engine, the dual fuel engine being assembled by providing an engine operable on a gaseous fuel and a liquid fuel; attaching a carburetor to an intake of the engine, the carburetor having a throat to mix gaseous fuel with air and liquid fuel with air, a float bowl, and a fuel passage extending from the float bowl to the throat to provide liquid fuel; coupling a switch to an engine to change operation of the engine between gaseous fuel and liquid fuel; and attaching a liquid fuel cut-off to a carburetor to close a fuel passage extending from a float bowl of the carburetor to a throat to the carburetor to provide liquid fuel upon actuation of the switch from liquid to gaseous fuel, as called for in claim 57 of U.S. Patent No. 10,697,398.

Therefore, each of the foregoing Firman generator models listed in Paragraph 61(a)-(e) infringes at least claims 1, 3-10, 22, and 57 of U.S. Patent No. 10,697,398.

63. Upon information and belief, Firman has been and is now making, using, selling, or offering for sale within the United States, or importing into the United States, the following additional generator models:

a. Model H03654, a dual fuel portable generator;

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b. Model H05754, a dual fuel portable generator;

c. Model H07554, a dual fuel portable generator;

d. Model H08052, a dual fuel portable generator; and

e. Model T07571F, a refurbished tri fuel portable generator.

64. Upon review of images, owner's manuals, and electrical schematics of the foregoing Firman generator models and comparisons of the images, owner's manuals, and electrical schematics of the foregoing Firman generator models to those of the Firman generator models listed in Paragraphs 59 and 61, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 3-7, 10, 22, and 57 of U.S. Patent No. 10,697,398. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a dual fuel engine having an engine operable on a gaseous fuel and a liquid fuel, a switch to change operation of an engine between gaseous fuel and liquid fuel, a carburetor attached to an intake of the engine to mix air and fuel and connect to a gaseous fuel source and a liquid fuel source, a liquid fuel valve positioned along a liquid fuel line coupling a liquid fuel source to a carburetor, a gaseous fuel valve positioned along a gaseous fuel line coupling a gaseous fuel source to the carburetor, and a liquid fuel cut-off incorporated into the carburetor to interrupt liquid fuel upon actuation of the switch from liquid to gaseous fuel, as called for in claim 1 of U.S. Patent No. 10,697,398.

b. Dependent claim 3 by specifically including all the aforementioned elements of claim 1 and, in addition, the gaseous fuel is LPG and the liquid fuel is gasoline, as called for in claim 3 of U.S. Patent No. 10,697,398.

c. Dependent claim 4 by specifically including all the aforementioned elements of claim 1 and, in addition, the engine is a pull-start engine having an electrical power generator to supply electrical power, as called for in claim 4 of U.S. Patent No. 10,697,398.

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d. Dependent claim 5 by specifically including all the aforementioned elements of claim 4 and, in addition, the switch is an electro-mechanical switch connecting one fuel source to the carburetor and connected to the electrical power generator and the liquid fuel cut-off is a solenoid connected to open and close a fuel path to the pull-start engine in response to reception of electrical power from the switch, as called for in claim 5 of U.S. Patent No. 10,697,398.

e. Dependent claim 6 by specifically including all the aforementioned elements of claim 4 and, in addition, the liquid fuel cut-off is a solenoid valve that operates within the carburetor to control liquid fuel flow to the engine and is powered by the electrical power generator, as called for in claim 6 of U.S. Patent No. 10,697,398.

f. Dependent claim 7 by specifically including all the aforementioned elements of claim 6 and, in addition, the switch selectively powers the solenoid valve by controlling electrical connection between the solenoid valve and the electrical power generator, as called for in claim 7 of U.S. Patent No. 10,697,398.

g. Dependent claim 10 by specifically including all the aforementioned elements of claim 6 and, in addition, the electrical power generator comprises a magneto or an alternator coupled to a voltage regulator to provide a regulated voltage to the solenoid valve, as called for in claim 10 of U.S. Patent No. 10,697,398.

h. Dependent claim 22 by specifically including all the aforementioned elements of claim 1 and, in addition, the liquid fuel cut-off is physically attached to an outer surface of the carburetor, as called for in claim 22 of U.S. Patent No. 10,697,398.

i. Independent claim 57 by specifically including a dual fuel engine, the dual fuel engine being assembled by providing an engine operable on a gaseous

fuel and a liquid fuel; attaching a carburetor to an intake of the engine, the carburetor having a throat to mix gaseous fuel with air and liquid fuel with air, a float bowl, and a fuel passage extending from the float bowl to the throat to provide liquid fuel; coupling a switch to an engine to change operation of the engine between gaseous fuel and liquid fuel; and attaching a liquid fuel cut-off to a carburetor to close a fuel passage extending from a float bowl of the carburetor to a throat to the carburetor to provide liquid fuel upon actuation of the switch from liquid to gaseous fuel, as called for in claim 57 of U.S. Patent No. 10,697,398.

Therefore, each of the foregoing Firman generator models listed in Paragraph 63(a)-(e) infringes at least claims 1, 3-7, 10, 22, and 57 of U.S. Patent No. 10,697,398.

65. Upon information and belief, Firman has been and is now making, using, selling, or offering for sale within the United States, or importing into the United States, the following additional generator models:

a. Model WH02942F, a refurbished dual fuel inverter portable generator;

b. Model WH03242F, a refurbished dual fuel inverter portable generator; and

c. Model WH03342, a dual fuel inverter portable generator.

66. Upon review of images, owner's manuals, and electrical schematics of the foregoing Firman generator models and comparisons of the images, owner's manuals, and electrical schematics of the foregoing Firman generator models to those of the Firman generator models listed in Paragraphs 59 and 61, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 3-10, 22, and 57 of U.S. Patent No. 10,697,398. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a dual fuel engine having an engine operable on a gaseous fuel and a liquid fuel, a switch to change operation of an engine between gaseous fuel and liquid fuel, a carburetor attached to an intake of the engine to mix air and fuel and connect to a

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gaseous fuel source and a liquid fuel source, a liquid fuel valve positioned along a liquid fuel line coupling a liquid fuel source to a carburetor, a gaseous fuel valve positioned along a gaseous fuel line coupling a gaseous fuel source to the carburetor, and a liquid fuel cut-off incorporated into the carburetor to interrupt liquid fuel upon actuation of the switch from liquid to gaseous fuel, as called for in claim 1 of U.S. Patent No. 10,697,398.

b. Dependent claim 3 by specifically including all the aforementioned elements of claim 1 and, in addition, the gaseous fuel is LPG and the liquid fuel is gasoline, as called for in claim 3 of U.S. Patent No. 10,697,398.

c. Dependent claim 4 by specifically including all the aforementioned elements of claim 1 and, in addition, the engine is a pull-start engine having an electrical power generator to supply electrical power, as called for in claim 4 of U.S. Patent No. 10,697,398.

d. Dependent claim 5 by specifically including all the aforementioned elements of claim 4 and, in addition, the switch is an electro-mechanical switch connecting one fuel source to the carburetor and connected to the electrical power generator and the liquid fuel cut-off is a solenoid connected to open and close a fuel path to the pull-start engine in response to reception of electrical power from the switch, as called for in claim 5 of U.S. Patent No. 10,697,398.

e. Dependent claim 6 by specifically including all the aforementioned elements of claim 4 and, in addition, the liquid fuel cut-off is a solenoid valve that operates within the carburetor to control liquid fuel flow to the engine and is powered by the electrical power generator, as called for in claim 6 of U.S. Patent No. 10,697,398.

f. Dependent claim 7 by specifically including all the aforementioned elements of claim 6 and, in addition, the switch selectively powers the solenoid valve by controlling electrical connection between the solenoid valve and the

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electrical power generator, as called for in claim 7 of U.S. Patent No. 10,697,398.

g. Dependent claim 8 by specifically including all the aforementioned elements of claim 6 and, in addition, the solenoid valve is normally open to provide liquid fuel to the engine when the solenoid valve is unpowered, as called for in claim 8 of U.S. Patent No. 10,697,398.

h. Dependent claim 9 by specifically including all the aforementioned elements of claim 8 and, in addition, a pull-starter drives the electrical power generator to power and close the solenoid valve while starting the engine on gaseous fuel, as called for in claim 9 of U.S. Patent No. 10,697,398.

i. Dependent claim 10 by specifically including all the aforementioned elements of claim 6 and, in addition, the electrical power generator comprises a magneto or an alternator coupled to a voltage regulator to provide a regulated voltage to the solenoid valve, as called for in claim 10 of U.S. Patent No. 10,697,398.

j. Dependent claim 22 by specifically including all the aforementioned elements of claim 1 and, in addition, the liquid fuel cut-off is physically attached to an outer surface of the carburetor, as called for in claim 22 of U.S. Patent No. 10,697,398.

k. Independent claim 57 by specifically including a dual fuel engine, the dual fuel engine being assembled by providing an engine operable on a gaseous fuel and a liquid fuel; attaching a carburetor to an intake of the engine, the carburetor having a throat to mix gaseous fuel with air and liquid fuel with air, a float bowl, and a fuel passage extending from the float bowl to the throat to provide liquid fuel; coupling a switch to an engine to change operation of the engine between gaseous fuel and liquid fuel; and attaching a liquid fuel cut-off to a carburetor to close a fuel passage extending from a float bowl of the carburetor to a throat to the carburetor to provide liquid

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fuel upon actuation of the switch from liquid to gaseous fuel, as called for in claim 57 of U.S. Patent No. 10,697,398.

Therefore, each of the foregoing Firman generator models listed in Paragraph 65(a)-(c) infringes at least claims 1, 3-10, 22, and 57 of U.S. Patent No. 10,697,398.

67. Champion has no adequate remedy at law against Firman's acts of infringement and will suffer irreparable harm unless Firman is preliminarily and permanently enjoined from its infringement of U.S. Patent No. 10,697,398.

68. Upon information and belief, Firman's infringement has been willful, deliberate, and with knowledge of Champion's rights under U.S. Patent No. 10,697,398.

69. Firman, by way of its infringing activity, has caused and continues to cause Champion to suffer damages in an amount to be determined at trial.

COUNT V: INFRINGEMENT OF U.S. PATENT NO. 11,143,120

70. Paragraphs 1 through 69 are incorporated by reference as if fully set forth herein.

71. U.S. Patent No. 11,143,120 is titled "FUEL SYSTEM FOR A MULTI-FUEL INTERNAL COMBUSTION ENGINE." U.S. Patent No. 11,143,120 was duly and legally issued on October 12, 2021. A true and correct copy of U.S. Patent No. 11,143,120 is attached as Exhibit E.

72. Champion is the lawful assignee of the entire right, title, and interest in and to U.S. Patent No. 11,143,120 and possesses all rights of recovery under the patent, including the right to recover damages for past infringement.

73. Champion has acquired and inspected the following Firman generator models that Firman has been and is making, using, selling, or offering for sale within the United States, or importing into the United States:

a. Model H03651, a dual fuel portable generator;

b. Model H03652, a dual fuel portable generator;

c. Model H05751, a dual fuel portable generator;

d. Model H05752, a dual fuel portable generator;

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e. Model H05753, a dual fuel portable generator;

f. Model H07552, a dual fuel portable generator;

g. Model H07553, a dual fuel portable generator;

h. Model H08051, a dual fuel portable generator;

i. Model H08053, a dual fuel portable generator;

j. Model T04073, a tri fuel portable generator;

k. Model T07571, a tri fuel portable generator;

l. Model T07573, a tri fuel portable generator;

m. Model T08071, a tri fuel portable generator;

n. Model T08072, a tri fuel portable generator;

o. Model T09275, a tri fuel portable generator;

p. Model T09371, a tri fuel portable generator;

q. Model WH02942, a dual fuel inverter portable generator;

r. Model WH03041, a dual fuel inverter portable generator;

s. Model WH03042, a dual fuel inverter portable generator;

t. Model WH03242, a dual fuel inverter portable generator;

u. Model WH03344, a dual fuel inverter portable generator;

v. Model WH03562OF, a dual fuel open frame inverter portable generator; and

w. Model WH03662OF, a dual fuel open frame inverter portable generator.

74. Upon acquisition, disassembly as needed, review of owner's manuals and electrical schematics, and inspection, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 12, 13, and 15 of U.S. Patent No. 11,143,120. Each of the foregoing Firman generator models infringes:

a. Independent claim 12 by specifically including a multi-fuel generator and fuel delivery system having a multi-fuel internal combustion engine configured to operate on a liquid fuel supplied from a liquid fuel source through a liquid fuel line and a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line, an alternator driven by the multi-fuel

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internal combustion engine, and a fuel regulator system including a primary pressure regulator coupled to a service valve of a pressurized fuel source to regulate fuel supplied from the pressurized fuel source to a reduced pressure and a secondary pressure regulator coupled to the primary pressure regulator to regulate fuel supplied from the primary pressure regulator to a desired pressure for delivery through the gaseous fuel line to operate the engine, as called for in claim 12 of U.S. Patent No. 11,143,120.

b. Dependent claim 13 by specifically including all the aforementioned elements of claim 12 and, in addition, an electro-mechanical valve system coupled to the engine and operated by an electrical switch powered by one of the alternator, a battery, and a magneto that controls fuel flow to the engine from the liquid fuel source and the pressurized fuel source, as called for in claim 13 of U.S. Patent No. 11,143,120.

c. Dependent claim 15 by specifically including all the aforementioned elements of claim 13 and, in addition, the electro-mechanical valve system is configured to prevent simultaneous delivery of the liquid fuel and the gaseous fuel to the engine, as called for in claim 15 of U.S. Patent No. 11,143,120.

Therefore, each of the foregoing Firman generator models listed in Paragraph 73(a)-(w) infringes at least claims 12, 13, and 15 of U.S. Patent No. 11,143,120.

75. Upon information and belief, Firman has been and is now making, using, selling, or offering for sale within the United States, or importing into the United States, the following additional generator models:

a. Model H03654, a dual fuel portable generator;

b. Model H05754, a dual fuel portable generator;

c. Model H07554, a dual fuel portable generator;

d. Model H08052, a dual fuel portable generator;

e. Model T07571F, a refurbished tri fuel portable generator;

f. Model WH02942F, a refurbished dual fuel inverter portable generator;

g. Model WH03242F, a refurbished dual fuel inverter portable generator; and

h. Model WH03342, a dual fuel inverter portable generator.

76. Upon review of images, owner's manuals, and electrical schematics of the foregoing Firman generator models and comparisons of the images, owner's manuals, and electrical schematics of the foregoing Firman generator models to those of the Firman generator models listed in Paragraph 73, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 12, 13, and 15 of U.S. Patent No. 11,143,120. Each of the foregoing Firman generator models infringes:

a. Independent claim 12 by specifically including a multi-fuel generator and fuel delivery system having a multi-fuel internal combustion engine configured to operate on a liquid fuel supplied from a liquid fuel source through a liquid fuel line and a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line, an alternator driven by the multi-fuel internal combustion engine, and a fuel regulator system including a primary pressure regulator coupled to a service valve of a pressurized fuel source to regulate fuel supplied from the pressurized fuel source to a reduced pressure and a secondary pressure regulator coupled to the primary pressure regulator to regulate fuel supplied from the primary pressure regulator to a desired pressure for delivery through the gaseous fuel line to operate the engine, as called for in claim 12 of U.S. Patent No. 11,143,120.

b. Dependent claim 13 by specifically including all the aforementioned elements of claim 12 and, in addition, an electro-mechanical valve system coupled to the engine and operated by an electrical switch powered by one of the alternator, a battery, and a magneto that controls fuel flow to the engine from the liquid fuel source and the pressurized fuel source, as called for in claim 13 of U.S. Patent No. 11,143,120.

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c. Dependent claim 15 by specifically including all the aforementioned elements of claim 13 and, in addition, the electro-mechanical valve system is configured to prevent simultaneous delivery of the liquid fuel and the gaseous fuel to the engine, as called for in claim 15 of U.S. Patent No. 11,143,120.

Therefore, each of the foregoing Firman generator models listed in Paragraph 75(a)-(h) infringes at least claims 12, 13, and 15 of U.S. Patent No. 11,143,120.

77. Champion has no adequate remedy at law against Firman's acts of infringement and will suffer irreparable harm unless Firman is preliminarily and permanently enjoined from its infringement of U.S. Patent No. 11,143,120.

78. Upon information and belief, Firman's infringement has been willful, deliberate, and with knowledge of Champion's rights under U.S. Patent No. 11,143,120.

79. Firman, by way of its infringing activity, has caused and continues to cause Champion to suffer damages in an amount to be determined at trial.

COUNT VI: INFRINGEMENT OF U.S. PATENT NO. 11,143,145

80. Paragraphs 1 through 79 are incorporated by reference as if fully set forth herein.

81. U.S. Patent No. 11,143,145 is titled "BATTERYLESS DUAL FUEL ENGINE WITH LIQUID FUEL CUT-OFF." U.S. Patent No. 11,143,145 was duly and legally issued on October 12, 2021. A true and correct copy of U.S. Patent No. 11,143,145 is attached as Exhibit F.

82. Champion is the lawful assignee of the entire right, title, and interest in and to U.S. Patent No. 11,143,145 and possesses all rights of recovery under the patent, including the right to recover damages for past infringement.

83. Champion has acquired and inspected the following Firman generator models that Firman has been and is making, using, selling, or offering for sale within the United States, or importing into the United States:

a. Model H03651, a dual fuel portable generator;

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b. Model H03652, a dual fuel portable generator;

c. Model H05751, a dual fuel portable generator;

d. Model H05752, a dual fuel portable generator;

e. Model H05753, a dual fuel portable generator;

f. Model H07552, a dual fuel portable generator;

g. Model H07553, a dual fuel portable generator;

h. Model H08051, a dual fuel portable generator;

i. Model H08053, a dual fuel portable generator;

j. Model T04073, a tri fuel portable generator;

k. Model T07571, a tri fuel portable generator;

l. Model T07573, a tri fuel portable generator;

m. Model T08071, a tri fuel portable generator;

n. Model T08072, a tri fuel portable generator;

o. Model T09275, a tri fuel portable generator;

p. Model T09371, a tri fuel portable generator;

q. Model WH03562OF, a dual fuel open frame inverter portable generator; and

r. Model WH03662OF, a dual fuel open frame inverter portable generator.

84. Upon acquisition, disassembly as needed, review of owner's manuals and electrical schematics, and inspection, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 2, and 4-7 of U.S. Patent No. 11,143,145. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a dual fuel generator having an engine operable on a gaseous fuel and a liquid fuel, an electrical power generator driven by the engine and including a charging coil, a switch to change operation of the engine between gaseous fuel and liquid fuel, a carburetor attached to an intake of the engine to mix air and fuel and connect to a gaseous fuel source and a liquid fuel source, a liquid fuel cut-off solenoid to interrupt liquid fuel flow to the engine upon actuation of the

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switch from liquid fuel to gaseous fuel, and a voltage regulator coupled to the charging coil to receive power therefrom and that operates to provide a regulated voltage to the liquid fuel cut-off solenoid, as called for in claim 1 of U.S. Patent No. 11,143,145.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, a liquid fuel valve along a liquid fuel line coupling the liquid fuel source to the carburetor and a gaseous fuel valve along a gaseous fuel line coupling the gaseous fuel source to the carburetor, as called for in claim 2 of U.S. Patent No. 11,143,145.

c. Dependent claim 4 by specifically including all the aforementioned elements of claim 2 and, in addition, the liquid fuel cut-off solenoid is attached to the carburetor, as called for in claim 4 of U.S. Patent No. 11,143,145.

d. Dependent claim 5 by specifically including all the aforementioned elements of claim 1 and, in addition, the gaseous fuel is LPG and the liquid fuel is gasoline, as called for in claim 5 of U.S. Patent No. 11,143,145.

e. Dependent claim 6 by specifically including all the aforementioned elements of claim 1 and, in addition, the switch is an electro-mechanical switch connecting one fuel source to the carburetor and connected to the electrical power generator and the liquid fuel cut-off solenoid is connected to open and close a fuel path to the engine in response to reception of electrical power from the switch, as called for in claim 6 of U.S. Patent No. 11,143,145.

f. Dependent claim 7 by specifically including all the aforementioned elements of claim 6 and, in addition, the switch selectively powers the solenoid valve by controlling electrical connection between the solenoid valve and the electrical power generator, as called for in claim 7 of U.S. Patent No. 11,143,145.

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Therefore, each of the foregoing Firman generator models listed in Paragraph 83(a)-(r) infringes at least claims 1, 2, and 4-7 of U.S. Patent No. 11,143,145.

85. Champion has also acquired and inspected the following Firman generator models that Firman has been and is making, using, selling, or offering for sale within the United States, or importing into the United States:

a. Model WH02942, a dual fuel inverter portable generator;

b. Model WH03041, a dual fuel inverter portable generator;

c. Model WH03042, a dual fuel inverter portable generator;

d. Model WH03242, a dual fuel inverter portable generator; and

e. Model WH03344, a dual fuel inverter portable generator.

86. Upon acquisition, disassembly as needed, review of owner's manuals and electrical schematics, and inspection, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 2, and 4-8 of U.S. Patent No. 11,143,145. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a dual fuel generator having an engine operable on a gaseous fuel and a liquid fuel, an electrical power generator driven by the engine and including a charging coil, a switch to change operation of the engine between gaseous fuel and liquid fuel, a carburetor attached to an intake of the engine to mix air and fuel and connect to a gaseous fuel source and a liquid fuel source, a liquid fuel cut-off solenoid to interrupt liquid fuel flow to the engine upon actuation of the switch from liquid fuel to gaseous fuel, and a voltage regulator coupled to the charging coil to receive power therefrom and that operates to provide a regulated voltage to the liquid fuel cut-off solenoid, as called for in claim 1 of U.S. Patent No. 11,143,145.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, a liquid fuel valve along a liquid fuel line coupling the liquid fuel source to the carburetor and a gaseous fuel valve

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along a gaseous fuel line coupling the gaseous fuel source to the carburetor, as called for in claim 2 of U.S. Patent No. 11,143,145.

c. Dependent claim 4 by specifically including all the aforementioned elements of claim 2 and, in addition, the liquid fuel cut-off solenoid is attached to the carburetor, as called for in claim 4 of U.S. Patent No. 11,143,145.

d. Dependent claim 5 by specifically including all the aforementioned elements of claim 1 and, in addition, the gaseous fuel is LPG and the liquid fuel is gasoline, as called for in claim 5 of U.S. Patent No. 11,143,145.

e. Dependent claim 6 by specifically including all the aforementioned elements of claim 1 and, in addition, the switch is an electro-mechanical switch connecting one fuel source to the carburetor and connected to the electrical power generator and the liquid fuel cut-off solenoid is connected to open and close a fuel path to the engine in response to reception of electrical power from the switch, as called for in claim 6 of U.S. Patent No. 11,143,145.

f. Dependent claim 7 by specifically including all the aforementioned elements of claim 6 and, in addition, the switch selectively powers the solenoid valve by controlling electrical connection between the solenoid valve and the electrical power generator, as called for in claim 7 of U.S. Patent No. 11,143,145.

g. Dependent claim 8 by specifically including all the aforementioned elements of claim 1 and, in addition, the liquid fuel cut-off solenoid is normally open to provide liquid fuel to the engine when the liquid fuel cut-off solenoid is unpowered, as called for in claim 8 of U.S. Patent No. 11,143,145.

Therefore, each of the foregoing Firman generator models listed in Paragraph 85(a)-(e) infringes at least claims 1, 2, and 4-8 of U.S. Patent No. 11,143,145.

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87. Upon information and belief, Firman has been and is now making, using, selling, or offering for sale within the United States, or importing into the United States, the following additional generator models:

a. Model H03654, a dual fuel portable generator;

b. Model H05754, a dual fuel portable generator;

c. Model H07554, a dual fuel portable generator;

d. Model H08052, a dual fuel portable generator; and

e. Model T07571F, a refurbished tri fuel portable generator.

88. Upon review of images, owner's manuals, and electrical schematics of the foregoing Firman generator models and comparisons of the images, owner's manuals, and electrical schematics of the foregoing Firman generator models to those of the Firman generator models listed in Paragraphs 83 and 85, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 2, and 4-7 of U.S. Patent No. 11,143,145. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a dual fuel generator having an engine operable on a gaseous fuel and a liquid fuel, an electrical power generator driven by the engine and including a charging coil, a switch to change operation of the engine between gaseous fuel and liquid fuel, a carburetor attached to an intake of the engine to mix air and fuel and connect to a gaseous fuel source and a liquid fuel source, a liquid fuel cut-off solenoid to interrupt liquid fuel flow to the engine upon actuation of the switch from liquid fuel to gaseous fuel, and a voltage regulator coupled to the charging coil to receive power therefrom and that operates to provide a regulated voltage to the liquid fuel cut-off solenoid, as called for in claim 1 of U.S. Patent No. 11,143,145.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, a liquid fuel valve along a liquid fuel line

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coupling the liquid fuel source to the carburetor and a gaseous fuel valve along a gaseous fuel line coupling the gaseous fuel source to the carburetor, as called for in claim 2 of U.S. Patent No. 11,143,145.

c. Dependent claim 4 by specifically including all the aforementioned elements of claim 2 and, in addition, the liquid fuel cut-off solenoid is attached to the carburetor, as called for in claim 4 of U.S. Patent No. 11,143,145.

d. Dependent claim 5 by specifically including all the aforementioned elements of claim 1 and, in addition, the gaseous fuel is LPG and the liquid fuel is gasoline, as called for in claim 5 of U.S. Patent No. 11,143,145.

e. Dependent claim 6 by specifically including all the aforementioned elements of claim 1 and, in addition, the switch is an electro-mechanical switch connecting one fuel source to the carburetor and connected to the electrical power generator and the liquid fuel cut-off solenoid is connected to open and close a fuel path to the engine in response to reception of electrical power from the switch, as called for in claim 6 of U.S. Patent No. 11,143,145.

f. Dependent claim 7 by specifically including all the aforementioned elements of claim 6 and, in addition, the switch selectively powers the solenoid valve by controlling electrical connection between the solenoid valve and the electrical power generator, as called for in claim 7 of U.S. Patent No. 11,143,145.

Therefore, each of the foregoing Firman generator models listed in Paragraph 87(a)-(e) infringes at least claims 1, 2, and 4-7 of U.S. Patent No. 11,143,145.

89. Upon information and belief, Firman has been and is now making, using, selling, or offering for sale within the United States, or importing into the United States, the following additional generator models:

a. Model WH02942F, a refurbished dual fuel inverter portable generator;

b. Model WH03242F, a refurbished dual fuel inverter portable generator; and

c. Model WH03342, a dual fuel inverter portable generator.

90. Upon review of images, owner's manuals, and electrical schematics of the foregoing Firman generator models and comparisons of the images, owner's manuals, and electrical schematics of the foregoing Firman generator models to those of the Firman generator models listed in Paragraphs 83 and 85, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 2, and 4-8 of U.S. Patent No. 11,143,145. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a dual fuel generator having an engine operable on a gaseous fuel and a liquid fuel, an electrical power generator driven by the engine and including a charging coil, a switch to change operation of the engine between gaseous fuel and liquid fuel, a carburetor attached to an intake of the engine to mix air and fuel and connect to a gaseous fuel source and a liquid fuel source, a liquid fuel cut-off solenoid to interrupt liquid fuel flow to the engine upon actuation of the switch from liquid fuel to gaseous fuel, and a voltage regulator coupled to the charging coil to receive power therefrom and that operates to provide a regulated voltage to the liquid fuel cut-off solenoid, as called for in claim 1 of U.S. Patent No. 11,143,145.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, a liquid fuel valve along a liquid fuel line coupling the liquid fuel source to the carburetor and a gaseous fuel valve along a gaseous fuel line coupling the gaseous fuel source to the carburetor, as called for in claim 2 of U.S. Patent No. 11,143,145.

c. Dependent claim 4 by specifically including all the aforementioned elements of claim 2 and, in addition, the liquid fuel cut-off solenoid is attached to the carburetor, as called for in claim 4 of U.S. Patent No. 11,143,145.

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d. Dependent claim 5 by specifically including all the aforementioned elements of claim 1 and, in addition, the gaseous fuel is LPG and the liquid fuel is gasoline, as called for in claim 5 of U.S. Patent No. 11,143,145.

e. Dependent claim 6 by specifically including all the aforementioned elements of claim 1 and, in addition, the switch is an electro-mechanical switch connecting one fuel source to the carburetor and connected to the electrical power generator and the liquid fuel cut-off solenoid is connected to open and close a fuel path to the engine in response to reception of electrical power from the switch, as called for in claim 6 of U.S. Patent No. 11,143,145.

f. Dependent claim 7 by specifically including all the aforementioned elements of claim 6 and, in addition, the switch selectively powers the solenoid valve by controlling electrical connection between the solenoid valve and the electrical power generator, as called for in claim 7 of U.S. Patent No. 11,143,145.

g. Dependent claim 8 by specifically including all the aforementioned elements of claim 1 and, in addition, the liquid fuel cut-off solenoid is normally open to provide liquid fuel to the engine when the liquid fuel cut-off solenoid is unpowered, as called for in claim 8 of U.S. Patent No. 11,143,145.

Therefore, each of the foregoing Firman generator models listed in Paragraph 89(a)-(c) infringes at least claims 1, 2, and 4-8 of U.S. Patent No. 11,143,145.

91. Champion has no adequate remedy at law against Firman's acts of infringement and will suffer irreparable harm unless Firman is preliminarily and permanently enjoined from its infringement of U.S. Patent No. 11,143,145.

92. Upon information and belief, Firman's infringement has been willful, deliberate, and with knowledge of Champion's rights under U.S. Patent No. 11,143,145.

93. Firman, by way of its infringing activity, has caused and continues to cause Champion to suffer damages in an amount to be determined at trial.

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COUNT VII: INFRINGEMENT OF U.S. PATENT NO. 11,306,667

94. Paragraphs 1 through 93 are incorporated by reference as if fully set forth herein.

95. U.S. Patent No. 11,306,667 is titled "DUAL FUEL SELECTOR SWITCH." U.S. Patent No. 11,306,667 was duly and legally issued on April 19, 2022. A true and correct copy of U.S. Patent No. 11,306,667 is attached as Exhibit G.

96. Champion is the lawful assignee of the entire right, title, and interest in and to U.S. Patent No. 11,306,667 and possesses all rights of recovery under the patent, including the right to recover damages for past infringement.

97. Champion has acquired and inspected the following Firman generator models that Firman has been and is making, using, selling, or offering for sale within the United States, or importing into the United States:

a. Model H03651, a dual fuel portable generator;

b. Model H03652, a dual fuel portable generator;

c. Model H05751, a dual fuel portable generator;

d. Model H05752, a dual fuel portable generator;

e. Model H05753, a dual fuel portable generator;

f. Model H07552, a dual fuel portable generator;

g. Model H07553, a dual fuel portable generator;

h. Model H08051, a dual fuel portable generator;

i. Model H08053, a dual fuel portable generator;

j. Model T04073, a tri fuel portable generator;

k. Model T07571, a tri fuel portable generator;

l. Model T07573, a tri fuel portable generator;

m. Model T08071, a tri fuel portable generator;

n. Model T08072, a tri fuel portable generator;

o. Model T09275, a tri fuel portable generator;

p. Model T09371, a tri fuel portable generator;

q. Model WH03562OF, a dual fuel open frame inverter portable generator; and

r. Model WH03662OF, a dual fuel open frame inverter portable generator.

98. Upon acquisition, disassembly as needed, review of owner's manuals and electrical schematics, and inspection, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1-3, 6, 7, and 9 of U.S. Patent No. 11,306,667. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a fuel selector for use with a dual fuel generator, the fuel selector a selector having a valve assembly fluidly connected to each of a first fuel source and a second fuel source, being operable to selectively control a first fuel flow and a second fuel flow from the first fuel source and the second fuel source, respectively, to an engine of the dual fuel generator, and including two fuel inputs, with a first fuel input connected to the first fuel source and a second fuel input connected to the second fuel source, and two fuel outputs for selectively supplying fuel to an engine from the first fuel source or the second fuel source; and a selector switch positioned on the valve assembly to allow a user to manually select one of the first fuel flow and the second fuel flow, as called for in claim 1 of U.S. Patent No. 11,306,667.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, the two fuel outputs selectively supply fuel to the engine from only one of the first fuel source or the second fuel source, responsive to selection of the first fuel flow or the second fuel flow via the selector switch, and a corresponding operation of the valve assembly, as called for in claim 2 of U.S. Patent No. 11,306,667.

c. Dependent claim 3 by specifically including all the aforementioned elements of claim 1 and, in addition, the valve assembly has a first fuel valve having open and closed positions to selectively control the first fuel flow to the engine and a second fuel valve having open and closed positions to

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selectively control the second fuel flow to the engine, as called for in claim 3 of U.S. Patent No. 11,306,667.

d. Dependent claim 6 by specifically including all the aforementioned elements of claim 1 and, in addition, a carburetor solenoid switch configured to activate an associated carburetor solenoid when actuated, as called for in claim 6 of U.S. Patent No. 11,306,667.

e. Dependent claim 7 by specifically including all the aforementioned elements of claim 6 and, in addition, the selector switch is in a first position, the selector switch actuates the carburetor solenoid switch, so as to activate the carburetor solenoid and stop the second fuel flow to the engine, as called for in claim 7 of U.S. Patent No. 11,306,667.

f. Dependent claim 9 by specifically including all the aforementioned elements of claim 1 and, in addition, the first fuel source is an LPG fuel source and wherein the second fuel source is a gasoline source, as called for in claim 9 of U.S. Patent No. 11,306,667.

Therefore, each of the foregoing Firman generator models listed in Paragraph 97(a)-(r) infringes at least claims 1-3, 6, 7, and 9 of U.S. Patent No. 11,306,667.

99. Champion has also acquired and inspected the following Firman generator models that Firman has been and is making, using, selling, or offering for sale within the United States, or importing into the United States:

a. Model WH02942, a dual fuel inverter portable generator;

b. Model WH03041, a dual fuel inverter portable generator;

c. Model WH03042, a dual fuel inverter portable generator;

d. Model WH03242, a dual fuel inverter portable generator; and

e. Model WH03344, a dual fuel inverter portable generator.

100. Upon acquisition, disassembly as needed, review of owner's manuals and electrical schematics, and inspection, it was determined that each of the foregoing Firman

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generator models includes all of the elements of at least claims 1-3, 6, 7, and 9-18 of U.S. Patent No. 11,306,667. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a fuel selector for use with a dual fuel generator, the fuel selector a selector having a valve assembly fluidly connected to each of a first fuel source and a second fuel source, being operable to selectively control a first fuel flow and a second fuel flow from the first fuel source and the second fuel source, respectively, to an engine of the dual fuel generator, and including two fuel inputs, with a first fuel input connected to the first fuel source and a second fuel input connected to the second fuel source, and two fuel outputs for selectively supplying fuel to an engine from the first fuel source or the second fuel source; and a selector switch positioned on the valve assembly to allow a user to manually select one of the first fuel flow and the second fuel flow, as called for in claim 1 of U.S. Patent No. 11,306,667.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, the two fuel outputs selectively supply fuel to the engine from only one of the first fuel source or the second fuel source, responsive to selection of the first fuel flow or the second fuel flow via the selector switch, and a corresponding operation of the valve assembly, as called for in claim 2 of U.S. Patent No. 11,306,667.

c. Dependent claim 3 by specifically including all the aforementioned elements of claim 1 and, in addition, the valve assembly has a first fuel valve having open and closed positions to selectively control the first fuel flow to the engine and a second fuel valve having open and closed positions to selectively control the second fuel flow to the engine, as called for in claim 3 of U.S. Patent No. 11,306,667.

d. Dependent claim 6 by specifically including all the aforementioned elements of claim 1 and, in addition, a carburetor solenoid switch configured to

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activate an associated carburetor solenoid when actuated, as called for in claim 6 of U.S. Patent No. 11,306,667.

e. Dependent claim 7 by specifically including all the aforementioned elements of claim 6 and, in addition, the selector switch is in a first position, the selector switch actuates the carburetor solenoid switch, so as to activate the carburetor solenoid and stop the second fuel flow to the engine, as called for in claim 7 of U.S. Patent No. 11,306,667.

f. Dependent claim 9 by specifically including all the aforementioned elements of claim 1 and, in addition, the first fuel source is an LPG fuel source and wherein the second fuel source is a gasoline source, as called for in claim 9 of U.S. Patent No. 11,306,667.

g. Independent claim 10 by specifically including a fuel selector of a dual fuel generator with a valve assembly fluidly connected to each of a first fuel source and a second fuel source, the valve assembly being operable to selectively control a first fuel flow and a second fuel flow from the first fuel source and the second fuel source, respectively, to an engine of the dual fuel generator; a selector switch having a first fuel mode and a second fuel mode, a fuel solenoid having open and closed positions; and a solenoid switch having open and closed positions to activate and deactivate the fuel solenoid; wherein when the selector switch is in the first fuel mode, the solenoid switch and the fuel solenoid are in the closed positions, when the selector switch is in the second fuel mode, the solenoid switch and the fuel solenoid are in the open positions, and positioning of the selector switch in the first fuel mode and the second fuel mode enables a selection of one of the first fuel flow and the second fuel flow, as called for in claim 10 of U.S. Patent No. 11,306,667.

h. Dependent claim 11 by specifically including all the aforementioned elements of claim 10 and, in addition, the selector switch triggers the

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solenoid switch when changed from the second fuel mode to the first fuel mode, so as to cause the solenoid switch and the fuel solenoid to operate in the closed positions, as called for in claim 1 of U.S. Patent No. 11,306,667.

i. Dependent claim 12 by specifically including all the aforementioned elements of claim 10 and, in addition, the valve assembly is positioned on or adjacent the selector switch, as called for in claim 12 of U.S. Patent No. 11,306,667.

j. Dependent claim 13 by specifically including all the aforementioned elements of claim 10 and, in addition, the valve assembly comprises: two fuel inputs, with a first fuel input connected to the first fuel source and a second fuel input connected to the second fuel source; and two fuel outputs for selectively supplying fuel to the engine from the first fuel source or the second fuel source, as called for in claim 13 of U.S. Patent No. 11,306,667.

k. Dependent claim 14 by specifically including all the aforementioned elements of claim 13 and, in addition, the two fuel outputs selectively supply fuel to the engine from only one of the first fuel source or the second fuel source, responsive to selection of the first fuel flow or the second fuel flow via the selector switch and a corresponding operation of the valve assembly, as called for in claim 14 of U.S. Patent No. 11,306,667.

l. Dependent claim 15 by specifically including all the aforementioned elements of claim 13 and, in addition, the valve assembly includes a first fuel valve having open and closed positions to selectively control the first fuel flow to the engine and a second fuel valve having open and closed positions to selectively control the second fuel flow to the engine, as called for in claim 15 of U.S. Patent No. 11,306,667.

m. Dependent claim 16 by specifically including all the aforementioned elements of claim 10 and, in addition, the first fuel source is an LPG fuel

source and wherein the second fuel source is a gasoline source, as called for in claim 16 of U.S. Patent No. 11,306,667.

n. Dependent claim 17 by specifically including all the aforementioned elements of claim 10 and, in addition, the fuel solenoid is a carburetor shutoff solenoid, as called for in claim 17 of U.S. Patent No. 11,306,667.

o. Dependent claim 18 by specifically including all the aforementioned elements of claim 10 and, in addition, positioning the selector switch in the first fuel mode enables the selection of the first fuel source to the generator, and positioning the selector switch in the second fuel mode enables the selection of the second fuel source to the generator, as called for in claim 18 of U.S. Patent No. 11,306,667.

Therefore, each of the foregoing Firman generator models listed in Paragraph 99(a)-(e) infringes at least claims 1-3, 6, 7, and 9-18 of U.S. Patent No. 11,306,667.

101. Upon information and belief, Firman has been and is now making, using, selling, or offering for sale within the United States, or importing into the United States, the following additional generator models:

a. Model H03654, a dual fuel portable generator;

b. Model H05754, a dual fuel portable generator;

c. Model H07554, a dual fuel portable generator;

d. Model H08052, a dual fuel portable generator; and

e. Model T07571F, a refurbished tri fuel portable generator.

102. Upon review of images, owner's manuals, and electrical schematics of the foregoing Firman generator models and comparisons of the images, owner's manuals, and electrical schematics of the foregoing Firman generator models to those of the Firman generator models listed in Paragraphs 97 and 99, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1-3, 6, 7, and 9 of U.S. Patent No. 11,306,667. Each of the foregoing Firman generator models infringes:

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a. Independent claim 1 by specifically including a fuel selector for use with a dual fuel generator, the fuel selector a selector having a valve assembly fluidly connected to each of a first fuel source and a second fuel source, being operable to selectively control a first fuel flow and a second fuel flow from the first fuel source and the second fuel source, respectively, to an engine of the dual fuel generator, and including two fuel inputs, with a first fuel input connected to the first fuel source and a second fuel input connected to the second fuel source, and two fuel outputs for selectively supplying fuel to an engine from the first fuel source or the second fuel source; and a selector switch positioned on the valve assembly to allow a user to manually select one of the first fuel flow and the second fuel flow, as called for in claim 1 of U.S. Patent No. 11,306,667.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, the two fuel outputs selectively supply fuel to the engine from only one of the first fuel source or the second fuel source, responsive to selection of the first fuel flow or the second fuel flow via the selector switch, and a corresponding operation of the valve assembly, as called for in claim 2 of U.S. Patent No. 11,306,667.

c. Dependent claim 3 by specifically including all the aforementioned elements of claim 1 and, in addition, the valve assembly has a first fuel valve having open and closed positions to selectively control the first fuel flow to the engine and a second fuel valve having open and closed positions to selectively control the second fuel flow to the engine, as called for in claim 3 of U.S. Patent No. 11,306,667.

d. Dependent claim 6 by specifically including all the aforementioned elements of claim 1 and, in addition, a carburetor solenoid switch configured to activate an associated carburetor solenoid when actuated, as called for in claim 6 of U.S. Patent No. 11,306,667.

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e. Dependent claim 7 by specifically including all the aforementioned elements of claim 6 and, in addition, the selector switch is in a first position, the selector switch actuates the carburetor solenoid switch, so as to activate the carburetor solenoid and stop the second fuel flow to the engine, as called for in claim 7 of U.S. Patent No. 11,306,667.

f. Dependent claim 9 by specifically including all the aforementioned elements of claim 1 and, in addition, the first fuel source is a an LPG fuel source and wherein the second fuel source is a gasoline source, as called for in claim 9 of U.S. Patent No. 11,306,667.

Therefore, each of the foregoing Firman generator models listed in Paragraph 101(a)-(e) infringes at least claims 1-3, 6, 7, and 9 of U.S. Patent No. 11,306,667.

103. Upon information and belief, Firman also has been and is now making, using, selling, or offering for sale within the United States, or importing into the United States, the following additional generator models:

a. Model WH02942F, a refurbished dual fuel inverter portable generator;

b. Model WH03242F, a refurbished dual fuel inverter portable generator; and

c. Model WH03342, a dual fuel inverter portable generator.

104. Upon review of images, owner's manuals, and electrical schematics of the foregoing Firman generator models and comparisons of the images, owner's manuals, and electrical schematics of the foregoing Firman generator models to those of the Firman generator models listed in Paragraphs 97 and 99, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1-3, 6, 7, and 9-18 of U.S. Patent No. 11,306,667. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a fuel selector for use with a dual fuel generator, the fuel selector a selector having a valve assembly fluidly connected to each of a first fuel source and a second fuel source, being operable to selectively control a first fuel flow and a second fuel flow

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from the first fuel source and the second fuel source, respectively, to an engine of the dual fuel generator, and including two fuel inputs, with a first fuel input connected to the first fuel source and a second fuel input connected to the second fuel source, and two fuel outputs for selectively supplying fuel to an engine from the first fuel source or the second fuel source; and a selector switch positioned on the valve assembly to allow a user to manually select one of the first fuel flow and the second fuel flow, as called for in claim 1 of U.S. Patent No. 11,306,667.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, the two fuel outputs selectively supply fuel to the engine from only one of the first fuel source or the second fuel source, responsive to selection of the first fuel flow or the second fuel flow via the selector switch, and a corresponding operation of the valve assembly, as called for in claim 2 of U.S. Patent No. 11,306,667.

c. Dependent claim 3 by specifically including all the aforementioned elements of claim 1 and, in addition, the valve assembly has a first fuel valve having open and closed positions to selectively control the first fuel flow to the engine and a second fuel valve having open and closed positions to selectively control the second fuel flow to the engine, as called for in claim 3 of U.S. Patent No. 11,306,667.

d. Dependent claim 6 by specifically including all the aforementioned elements of claim 1 and, in addition, a carburetor solenoid switch configured to activate an associated carburetor solenoid when actuated, as called for in claim 6 of U.S. Patent No. 11,306,667.

e. Dependent claim 7 by specifically including all the aforementioned elements of claim 6 and, in addition, the selector switch is in a first position, the selector switch actuates the carburetor solenoid switch, so as to activate the

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carburetor solenoid and stop the second fuel flow to the engine, as called for in claim 7 of U.S. Patent No. 11,306,667.

f. Dependent claim 9 by specifically including all the aforementioned elements of claim 1 and, in addition, the first fuel source is a an LPG fuel source and wherein the second fuel source is a gasoline source, as called for in claim 9 of U.S. Patent No. 11,306,667.

g. Independent claim 10 by specifically including a fuel selector of a dual fuel generator with a valve assembly fluidly connected to each of a first fuel source and a second fuel source, the valve assembly being operable to selectively control a first fuel flow and a second fuel flow from the first fuel source and the second fuel source, respectively, to an engine of the dual fuel generator; a selector switch having a first fuel mode and a second fuel mode, a fuel solenoid having open and closed positions; and a solenoid switch having open and closed positions to activate and deactivate the fuel solenoid; wherein when the selector switch is in the first fuel mode, the solenoid switch and the fuel solenoid are in the closed positions, when the selector switch is in the second fuel mode, the solenoid switch and the fuel solenoid are in the open positions, and positioning of the selector switch in the first fuel mode and the second fuel mode enables a selection of one of the first fuel flow and the second fuel flow, as called for in claim 10 of U.S. Patent No. 11,306,667.

h. Dependent claim 11 by specifically including all the aforementioned elements of claim 10 and, in addition, the selector switch triggers the solenoid switch when changed from the second fuel mode to the first fuel mode, so as to cause the solenoid switch and the fuel solenoid to operate in the closed positions, as called for in claim 1 of U.S. Patent No. 11,306,667.

i. Dependent claim 12 by specifically including all the aforementioned elements of claim 10 and, in addition, the valve assembly is positioned on

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or adjacent the selector switch, as called for in claim 12 of U.S. Patent No. 11,306,667.

j. Dependent claim 13 by specifically including all the aforementioned elements of claim 10 and, in addition, the valve assembly comprises: two fuel inputs, with a first fuel input connected to the first fuel source and a second fuel input connected to the second fuel source; and two fuel outputs for selectively supplying fuel to the engine from the first fuel source or the second fuel source, as called for in claim 13 of U.S. Patent No. 11,306,667.

k. Dependent claim 14 by specifically including all the aforementioned elements of claim 13 and, in addition, the two fuel outputs selectively supply fuel to the engine from only one of the first fuel source or the second fuel source, responsive to selection of the first fuel flow or the second fuel flow via the selector switch and a corresponding operation of the valve assembly, as called for in claim 14 of U.S. Patent No. 11,306,667.

l. Dependent claim 15 by specifically including all the aforementioned elements of claim 13 and, in addition, the valve assembly includes a first fuel valve having open and closed positions to selectively control the first fuel flow to the engine and a second fuel valve having open and closed positions to selectively control the second fuel flow to the engine, as called for in claim 15 of U.S. Patent No. 11,306,667.

m. Dependent claim 16 by specifically including all the aforementioned elements of claim 10 and, in addition, the first fuel source is a an LPG fuel source and wherein the second fuel source is a gasoline source, as called for in claim 16 of U.S. Patent No. 11,306,667.

n. Dependent claim 17 by specifically including all the aforementioned elements of claim 10 and, in addition, the fuel solenoid is a carburetor shutoff solenoid, as called for in claim 17 of U.S. Patent No. 11,306,667.

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o. Dependent claim 18 by specifically including all the aforementioned elements of claim 10 and, in addition, positioning the selector switch in the first fuel mode enables the selection of the first fuel source to the generator, and positioning the selector switch in the second fuel mode enables the selection of the second fuel source to the generator, as called for in claim 18 of U.S. Patent No. 11,306,667.

Therefore, each of the foregoing Firman generator models listed in Paragraph 103(a)-(c) infringes at least claims 1-3, 6, 7, and 9-18 of U.S. Patent No. 11,306,667.

105. Champion has no adequate remedy at law against Firman's acts of infringement and will suffer irreparable harm unless Firman is preliminarily and permanently enjoined from its infringement of U.S. Patent No. 11,306,667.

106. Upon information and belief, Firman's infringement has been willful, deliberate, and with knowledge of Champion's rights under U.S. Patent No. 11,306,667.

107. Firman, by way of its infringing activity, has caused and continues to cause Champion to suffer damages in an amount to be determined at trial.

COUNT VIII: INFRINGEMENT OF U.S. PATENT NO. 11,492,985

108. Paragraphs 1 through 107 are incorporated by reference as if fully set forth herein.

109. U.S. Patent No. 11,492,985 is titled "OFF-BOARD FUEL REGULATOR FOR GENERATOR ENGINE." U.S. Patent No. 11,492,985 was duly and legally issued on November 8, 2022. A true and correct copy of U.S. Patent No. 11,492,985 is attached as Exhibit H.

110. Champion is the lawful assignee of the entire right, title, and interest in and to U.S. Patent No. 11,492,985 and possesses all rights of recovery under the patent, including the right to recover damages for past infringement.

111. Champion has acquired and inspected the following Firman generator models that Firman has been and is making, using, selling, or offering for sale within the United States, or importing into the United States:

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a. Model WH02942, a dual fuel inverter portable generator;

b. Model WH03041, a dual fuel inverter portable generator;

c. Model WH03042, a dual fuel inverter portable generator;

d. Model WH03242, a dual fuel inverter portable generator; and

e. Model WH03344, a dual fuel inverter portable generator.

112. Upon acquisition, disassembly as needed, review of owner's manuals and electrical schematics, and inspection, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 4-7, 11, 14-16, and 18 of U.S. Patent No. 11,492,985. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including generator and fuel delivery system having a generator free of any pressure regulator and configured to operate on a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line and having a fuel regulator system located off-board the generator, including a first stage and a second stage, and configured to regulate a gaseous fuel supplied from a pressurized fuel source in the first stage down to a reduced pressure and regulate the reduced pressure gaseous fuel in the second stage down to a desired pressure for delivery through a gaseous fuel line to operate the generator, as called for in claim 1 of U.S. Patent No. 11,492,985.

b. Dependent claim 4 by specifically including all the aforementioned elements of claim 1 and, in addition, the generator comprises a dual fuel generator configured to operate on the gaseous fuel and on a liquid fuel, the liquid fuel supplied from a liquid fuel source through a liquid fuel line, as called for in claim 4 of U.S. Patent No. 11,492,985.

c. Dependent claim 5 by specifically including all the aforementioned elements of claim 4 and, in addition, a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the dual fuel generator from the liquid fuel source through the liquid fuel line

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and the pressurized fuel source through the gaseous fuel line, as called for in claim 5 of U.S. Patent No. 11,492,985.

d. Dependent claim 6 by specifically including all the aforementioned elements of claim 5 and, in addition, a fuel lockout apparatus is coupled to the mechanical fuel valve; when the mechanical fuel valve is in the first position, the fuel lockout apparatus communicates the liquid fuel source to the dual fuel generator and prevents the pressurized fuel source from coupling to the dual fuel generator; and when the mechanical fuel valve is in the second position, the fuel lockout apparatus permits the pressurized fuel source to couple to the dual fuel generator and interrupts the liquid fuel source communication with the dual fuel generator, as called for in claim 6 of U.S. Patent No. 11,492,985.

e. Dependent claim 7 by specifically including all the aforementioned elements of claim 1 and, in addition, the first stage comprises a primary pressure regulator and the second stage comprises a secondary pressure regulator and the generator and fuel delivery system further comprises a quick-connect hose coupling including a first end coupled to an outlet of the secondary pressure regulator and a second end coupled to an inlet of the gaseous fuel line to couple the secondary pressure regulator to the gaseous fuel line, as called for in claim 7 of U.S. Patent No. 11,492,985.

f. Independent claim 11 by specifically including a generator and fuel delivery system having a generator with an engine configured to operate on a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line; and a fuel regulator system located off-board the generator, including a first stage and a second stage, and configured to regulate a gaseous fuel supplied from a pressurized fuel source in the first stage down to a reduced pressure and regulate the reduced pressure gaseous fuel in the second stage down to a desired pressure for delivery through a gaseous fuel line to operate the

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generator, wherein the fuel regulator system outputs gaseous fuel to the generator for operation of an engine at the second reduced pressure, as called for in claim 11 of U.S. Patent No. 11,492,985.

g. Dependent claim 14 by specifically including all the aforementioned elements of claim 11 and, in addition, the generator comprises a dual fuel generator configured to operate on the gaseous fuel and on a liquid fuel, the liquid fuel supplied from a liquid fuel source through a liquid fuel line, as called for in claim 14 of U.S. Patent No. 11,492,985.

h. Dependent claim 15 by specifically including all the aforementioned elements of claim 14 and, in addition, a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the dual fuel generator from the liquid fuel source through the liquid fuel line and the pressurized fuel source through the gaseous fuel line, as called for in claim 15 of U.S. Patent No. 11,492,985.

i. Independent claim 16 by specifically including a dual fuel generator and fuel delivery system having a dual fuel generator configured to operate on a liquid fuel supplied from a liquid fuel source through a liquid fuel line and a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line; and a fuel regulator system located off board a dual fuel generator, including a primary pressure regulator coupled to a service valve of a pressurized fuel source, configured to regulate the gaseous fuel supplied from the pressurized fuel source in the first stage, the gaseous fuel regulated down to a first reduced pressure in the first stage and regulate the gaseous fuel output from the first stage in the second stage, the first reduced pressure gaseous fuel from the first stage being regulated down to a second reduced pressure in the second stage for delivery through the gaseous fuel line to operate the generator, wherein the fuel regulator system outputs gaseous fuel

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to the generator for operation of the engine at the second reduced pressure, as called for in claim 16 of U.S. Patent No. 11,492,985.

j. Dependent claim 18 by specifically including all the aforementioned elements of claim 16 and, in addition, a quick-connect hose coupling including a first end coupled to an outlet of the secondary pressure regulator and a second end coupled to an inlet of the gaseous fuel line to couple the secondary pressure regulator to the gaseous fuel line, as called for in claim 18 of U.S. Patent No. 11,492,985.

Therefore, each of the foregoing Firman generator models listed in Paragraph 111(a)-(e) infringes at least claims 1, 4-7, 11, 14-16, and 18 of U.S. Patent No. 11,492,985.

113. Upon information and belief, Firman has been and is now making, using, selling, or offering for sale within the United States, or importing into the United States, the following additional generator models:

a. Model WH02942F, a refurbished dual fuel inverter portable generator;

b. Model WH03242F, a refurbished dual fuel inverter portable generator; and

c. Model WH03342, a dual fuel inverter portable generator.

114. Upon review of images, owner's manuals, and electrical schematics of the foregoing Firman generator models and comparisons of the images, owner's manuals, and electrical schematics of the foregoing Firman generator models to those of the Firman generator models listed in Paragraph 111, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 4-7, 11, 14-16, and 18 of U.S. Patent No. 11,492,985. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including generator and fuel delivery system having a generator free of any pressure regulator and configured to operate on a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line and having a fuel regulator system located off-board the generator, including a first stage and a second stage, and configured to

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regulate a gaseous fuel supplied from a pressurized fuel source in the first stage down to a reduced pressure and regulate the reduced pressure gaseous fuel in the second stage down to a desired pressure for delivery through a gaseous fuel line to operate the generator, as called for in claim 1 of U.S. Patent No. 11,492,985.

b. Dependent claim 4 by specifically including all the aforementioned elements of claim 1 and, in addition, the generator comprises a dual fuel generator configured to operate on the gaseous fuel and on a liquid fuel, the liquid fuel supplied from a liquid fuel source through a liquid fuel line, as called for in claim 4 of U.S. Patent No. 11,492,985.

c. Dependent claim 5 by specifically including all the aforementioned elements of claim 4 and, in addition, a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the dual fuel generator from the liquid fuel source through the liquid fuel line and the pressurized fuel source through the gaseous fuel line, as called for in claim 5 of U.S. Patent No. 11,492,985.

d. Dependent claim 6 by specifically including all the aforementioned elements of claim 5 and, in addition, a fuel lockout apparatus is coupled to the mechanical fuel valve; when the mechanical fuel valve is in the first position, the fuel lockout apparatus communicates the liquid fuel source to the dual fuel generator and prevents the pressurized fuel source from coupling to the dual fuel generator; and when the mechanical fuel valve is in the second position, the fuel lockout apparatus permits the pressurized fuel source to couple to the dual fuel generator and interrupts the liquid fuel source communication with the dual fuel generator, as called for in claim 6 of U.S. Patent No. 11,492,985.

e. Dependent claim 7 by specifically including all the aforementioned elements of claim 1 and, in addition, the first stage comprises a primary pressure

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regulator and the second stage comprises a secondary pressure regulator and the generator and fuel delivery system further comprises a quick-connect hose coupling including a first end coupled to an outlet of the secondary pressure regulator and a second end coupled to an inlet of the gaseous fuel line to couple the secondary pressure regulator to the gaseous fuel line, as called for in claim 7 of U.S. Patent No. 11,492,985.

f. Independent claim 11 by specifically including a generator and fuel delivery system having a generator with an engine configured to operate on a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line; and a fuel regulator system located off-board the generator, including a first stage and a second stage, and configured to regulate a gaseous fuel supplied from a pressurized fuel source in the first stage down to a reduced pressure and regulate the reduced pressure gaseous fuel in the second stage down to a desired pressure for delivery through a gaseous fuel line to operate the generator, wherein the fuel regulator system outputs gaseous fuel to the generator for operation of an engine at the second reduced pressure, as called for in claim 11 of U.S. Patent No. 11,492,985.

g. Dependent claim 14 by specifically including all the aforementioned elements of claim 11 and, in addition, the generator comprises a dual fuel generator configured to operate on the gaseous fuel and on a liquid fuel, the liquid fuel supplied from a liquid fuel source through a liquid fuel line, as called for in claim 14 of U.S. Patent No. 11,492,985.

h. Dependent claim 15 by specifically including all the aforementioned elements of claim 14 and, in addition, a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the dual fuel generator from the liquid fuel source through the liquid fuel line and the pressurized fuel source through the gaseous fuel line, as called for in claim 15 of U.S. Patent No. 11,492,985.

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i. Independent claim 16 by specifically including a dual fuel generator and fuel delivery system having a dual fuel generator configured to operate on a liquid fuel supplied from a liquid fuel source through a liquid fuel line and a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line; and a fuel regulator system located off board a dual fuel generator, including a primary pressure regulator coupled to a service valve of a pressurized fuel source, configured to regulate the gaseous fuel supplied from the pressurized fuel source in the first stage, the gaseous fuel regulated down to a first reduced pressure in the first stage and regulate the gaseous fuel output from the first stage in the second stage, the first reduced pressure gaseous fuel from the first stage being regulated down to a second reduced pressure in the second stage for delivery through the gaseous fuel line to operate the generator, wherein the fuel regulator system outputs gaseous fuel to the generator for operation of the engine at the second reduced pressure, as called for in claim 16 of U.S. Patent No. 11,492,985.

j. Dependent claim 18 by specifically including all the aforementioned elements of claim 16 and, in addition, a quick-connect hose coupling including a first end coupled to an outlet of the secondary pressure regulator and a second end coupled to an inlet of the gaseous fuel line to couple the secondary pressure regulator to the gaseous fuel line, as called for in claim 18 of U.S. Patent No. 11,492,985.

Therefore, each of the foregoing Firman generator models listed in Paragraph 113(a)-(c) infringes at least claims 1, 4-7, 11, 14-16, and 18 of U.S. Patent No. 11,492,985.

115. Champion has no adequate remedy at law against Firman's acts of infringement and will suffer irreparable harm unless Firman is preliminarily and permanently enjoined from its infringement of U.S. Patent No. 11,492,985.

116. Upon information and belief, Firman's infringement has been willful, deliberate, and with knowledge of Champion's rights under U.S. Patent No. 11,492,985.

117. Firman, by way of its infringing activity, has caused and continues to cause Champion to suffer damages in an amount to be determined at trial.

COUNT IX: INFRINGEMENT OF U.S. PATENT NO. 11,530,654

118. Paragraphs 1 through 117 are incorporated by reference as if fully set forth herein.

119. U.S. Patent No. 11,530,654 is titled "OFF-BOARD FUEL REGULATOR FOR GENERATOR ENGINE." U.S. Patent No. 11,530,654 was duly and legally issued on December 20, 2022. A true and correct copy of U.S. Patent No. 11,530,654 is attached as Exhibit I.

120. Champion is the lawful assignee of the entire right, title, and interest in and to U.S. Patent No. 11,530,654 and possesses all rights of recovery under the patent, including the right to recover damages for past infringement.

121. Champion has acquired and inspected the following Firman generator models that Firman has been and is making, using, selling, or offering for sale within the United States, or importing into the United States:

a. Model WH02942, a dual fuel inverter portable generator;

b. Model WH03041, a dual fuel inverter portable generator;

c. Model WH03042, a dual fuel inverter portable generator;

d. Model WH03242, a dual fuel inverter portable generator; and

e. Model WH03344, a dual fuel inverter portable generator.

122. Upon acquisition, disassembly as needed, review of owner's manuals and electrical schematics, and inspection, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 2, 6, 7, and 10 of U.S. Patent No. 11,530,654. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a dual fuel generator and fuel delivery system including a dual fuel generator configured to operate on a liquid fuel supplied from a liquid fuel source through a liquid fuel line and a gaseous fuel supplied from a pressurized fuel source through a gaseous

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fuel line, a fuel regulator system located off board the dual fuel generator and having a primary pressure regulator coupled to a service valve of a pressurized fuel source and configured to regulate a gaseous fuel supplied from the pressurized fuel source to a first reduced pressure and a secondary pressure regulator coupled to the primary pressure regulator and configured to regulate the gaseous fuel supplied from the primary pressure regulator down from the first reduced pressure to a second reduced pressure for delivery through a gaseous fuel line to operate the dual fuel generator, a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the dual fuel generator from the liquid fuel source through the liquid fuel line and the pressurized fuel source through the gaseous fuel line, and a fuel lockout apparatus coupled to the mechanical fuel valve, wherein when the mechanical fuel valve is in the first position, the fuel lockout apparatus communicates the liquid fuel source to the dual fuel generator and prevents the pressurized fuel source from coupling to the dual fuel generator, and actuation of the mechanical fuel valve to the second position causes the fuel lockout apparatus to permit the pressurized fuel source to couple to the dual fuel generator and interrupts the liquid fuel source communication with the dual fuel generator, as called for in claim 1 of U.S. Patent No. 11,530,654.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, a first end of a quick-connect hose coupling coupled to an outlet of the secondary pressure regulator and a second end of the quick-connect hose coupling coupled to an inlet of the gaseous fuel line to mate with the first end of the quick-connect hose coupling to couple the secondary pressure regulator to the gaseous fuel line, as called for in claim 2 of U.S. Patent No. 11,530,654.

c. Independent claim 6 by specifically including a dual fuel generator and fuel delivery system having a dual fuel generator configured to operate on a liquid fuel supplied from a liquid fuel source through a liquid fuel line and a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line, a fuel regulator system located off board the dual fuel generator and having a primary pressure regulator coupled to a service valve of a pressurized fuel source and configured to regulate a gaseous fuel supplied from the pressurized fuel source to a first reduced pressure and a secondary pressure regulator coupled to the primary pressure regulator and configured to regulate the gaseous fuel supplied from the primary pressure regulator down from the first reduced pressure to a second reduced pressure for delivery through a gaseous fuel line to operate the dual fuel generator, a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the dual fuel generator from a liquid fuel source through a liquid fuel line and the pressurized fuel source through the gaseous fuel line and that opens and closes the liquid fuel line to selectively control fuel flow from the liquid fuel source to the dual fuel generator, and a fuel lockout apparatus coupled to the mechanical fuel valve and configured to prevent the pressurized fuel source from coupling to the gaseous fuel line while the mechanical fuel valve opens the liquid fuel line and permit the pressurized fuel source to couple to the gaseous fuel line while the mechanical fuel valve closes the liquid fuel line, as called for in claim 6 of U.S. Patent No. 11,530,654.

d. Dependent claim 7 by specifically including all the aforementioned elements of claim 6 and, in addition, the fuel lockout apparatus is further configured to prevent the mechanical fuel valve from opening the liquid fuel line while the dual fuel generator receives fuel from the pressurized fuel source, as called for in claim 7 of U.S. Patent No. 11,530,654.

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e. Independent claim 10 by specifically including a generator and fuel delivery system having a generator configured to operate on a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line and free from any pressure regulator and a fuel regulator system located off-board the generator and configured to regulate the gaseous fuel supplied from the pressurized fuel source in a first stage, the gaseous fuel regulated down to a reduced pressure in the first stage and regulate the reduced pressure gaseous fuel in a second stage, the reduced pressure gaseous fuel from the first stage regulated down to a desired pressure in the second stage for delivery through the gaseous fuel line to operate the generator, as called for in claim 10 of U.S. Patent No. 11,530,654.

Therefore, each of the foregoing Firman generator models listed in Paragraph 121(a)-(e) infringes at least claims 1, 2, 6, 7, and 10 of U.S. Patent No. 11,530,654.

123. Upon information and belief, Firman has been and is now making, using, selling, or offering for sale within the United States, or importing into the United States, the following additional generator models:

a. Model WH02942F, a refurbished dual fuel inverter portable generator;

b. Model WH03242F, a refurbished dual fuel inverter portable generator; and

c. Model WH03342, a dual fuel inverter portable generator.

124. Upon review of images, owner's manuals, and electrical schematics of the foregoing Firman generator models and comparisons of the images, owner's manuals, and electrical schematics of the foregoing Firman generator models to those of the Firman generator models listed in Paragraph 121, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 2, 6, 7, and 10 of U.S. Patent No. 11,530,654. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a dual fuel generator and fuel delivery system including a dual fuel generator configured to operate on a liquid fuel supplied from a liquid fuel source through a liquid fuel line and

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a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line, a fuel regulator system located off board the dual fuel generator and having a primary pressure regulator coupled to a service valve of a pressurized fuel source and configured to regulate a gaseous fuel supplied from the pressurized fuel source to a first reduced pressure and a secondary pressure regulator coupled to the primary pressure regulator and configured to regulate the gaseous fuel supplied from the primary pressure regulator down from the first reduced pressure to a second reduced pressure for delivery through a gaseous fuel line to operate the dual fuel generator, a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the dual fuel generator from the liquid fuel source through the liquid fuel line and the pressurized fuel source through the gaseous fuel line, and a fuel lockout apparatus coupled to the mechanical fuel valve, wherein when the mechanical fuel valve is in the first position, the fuel lockout apparatus communicates the liquid fuel source to the dual fuel generator and prevents the pressurized fuel source from coupling to the dual fuel generator, and actuation of the mechanical fuel valve to the second position causes the fuel lockout apparatus to permit the pressurized fuel source to couple to the dual fuel generator and interrupts the liquid fuel source communication with the dual fuel generator, as called for in claim 1 of U.S. Patent No. 11,530,654.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, a first end of a quick-connect hose coupling coupled to an outlet of the secondary pressure regulator and a second end of the quick-connect hose coupling coupled to an inlet of the gaseous fuel line to mate with the first end of the quick-connect hose coupling to couple the secondary pressure regulator to the gaseous fuel line, as called for in claim 2 of U.S. Patent No. 11,530,654.

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c. Independent claim 6 by specifically including a dual fuel generator and fuel delivery system having a dual fuel generator configured to operate on a liquid fuel supplied from a liquid fuel source through a liquid fuel line and a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line, a fuel regulator system located off board the dual fuel generator and having a primary pressure regulator coupled to a service valve of a pressurized fuel source and configured to regulate a gaseous fuel supplied from the pressurized fuel source to a first reduced pressure and a secondary pressure regulator coupled to the primary pressure regulator and configured to regulate the gaseous fuel supplied from the primary pressure regulator down from the first reduced pressure to a second reduced pressure for delivery through a gaseous fuel line to operate the dual fuel generator, a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the dual fuel generator from a liquid fuel source through a liquid fuel line and the pressurized fuel source through the gaseous fuel line and that opens and closes the liquid fuel line to selectively control fuel flow from the liquid fuel source to the dual fuel generator, and a fuel lockout apparatus coupled to the mechanical fuel valve and configured to prevent the pressurized fuel source from coupling to the gaseous fuel line while the mechanical fuel valve opens the liquid fuel line and permit the pressurized fuel source to couple to the gaseous fuel line while the mechanical fuel valve closes the liquid fuel line, as called for in claim 6 of U.S. Patent No. 11,530,654.

d. Dependent claim 7 by specifically including all the aforementioned elements of claim 6 and, in addition, the fuel lockout apparatus is further configured to prevent the mechanical fuel valve from opening the liquid fuel line while the dual fuel generator receives fuel from the pressurized fuel source, as called for in claim 7 of U.S. Patent No. 11,530,654.

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e. Independent claim 10 by specifically including a generator and fuel delivery system having a generator configured to operate on a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line and free from any pressure regulator and a fuel regulator system located off-board the generator and configured to regulate the gaseous fuel supplied from the pressurized fuel source in a first stage, the gaseous fuel regulated down to a reduced pressure in the first stage and regulate the reduced pressure gaseous fuel in a second stage, the reduced pressure gaseous fuel from the first stage regulated down to a desired pressure in the second stage for delivery through the gaseous fuel line to operate the generator, as called for in claim 10 of U.S. Patent No. 11,530,654.

Therefore, each of the foregoing Firman generator models listed in Paragraph 123(a)-(c) infringes at least claims 1, 2, 6, 7, and 10 of U.S. Patent No. 11,530,654.

125. Champion has no adequate remedy at law against Firman's acts of infringement and will suffer irreparable harm unless Firman is preliminarily and permanently enjoined from its infringement of U.S. Patent No. 11,530,654.

126. Upon information and belief, Firman's infringement has been willful, deliberate, and with knowledge of Champion's rights under U.S. Patent No. 11,530,654.

127. Firman, by way of its infringing activity, has caused and continues to cause Champion to suffer damages in an amount to be determined at trial.

COUNT X: INFRINGEMENT OF U.S. PATENT NO. 11,761,390

128. Paragraphs 1 through 127 are incorporated by reference as if fully set forth herein.

129. U.S. Patent No. 11,761,390 is titled "DUAL FUEL SELECTOR SWITCH." U.S. Patent No. 11,761,390 was duly and legally issued on September 19, 2023. A true and correct copy of U.S. Patent No. 11,761,390 is attached as Exhibit J.

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130. Champion is the lawful assignee of the entire right, title, and interest in and to U.S. Patent No. 11,761,390 and possesses all rights of recovery under the patent, including the right to recover damages for past infringement.

131. Champion has acquired and inspected the following Firman generator models that Firman has been and is making, using, selling, or offering for sale within the United States, or importing into the United States:

a. Model H03651, a dual fuel portable generator;

b. Model H03652, a dual fuel portable generator;

c. Model H05751, a dual fuel portable generator;

d. Model H05752, a dual fuel portable generator;

e. Model H05753, a dual fuel portable generator;

f. Model H07552, a dual fuel portable generator;

g. Model H07553, a dual fuel portable generator;

h. Model H08051, a dual fuel portable generator;

i. Model H08053, a dual fuel portable generator;

j. Model T04073, a tri fuel portable generator;

k. Model T07571, a tri fuel portable generator;

l. Model T07573, a tri fuel portable generator;

m. Model T08071, a tri fuel portable generator;

n. Model T08072, a tri fuel portable generator;

o. Model T09275, a tri fuel portable generator;

p. Model T09371, a tri fuel portable generator;

q. Model WH02942, a dual fuel inverter portable generator;

r. Model WH03041, a dual fuel inverter portable generator;

s. Model WH03042, a dual fuel inverter portable generator;

t. Model WH03242, a dual fuel inverter portable generator;

u. Model WH03344, a dual fuel inverter portable generator;

v. Model WH03562OF, a dual fuel open frame inverter portable generator; and

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w. Model WH03662OF, a dual fuel open frame inverter portable generator.

132. Upon acquisition, disassembly as needed, review of owner's manuals and electrical schematics, and inspection, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1-9 of U.S. Patent No. 11,761,390. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a selector switch having a first fuel mode configured to enable a first fuel flow from a first fuel source to an engine of a dual fuel generator and a second fuel mode configured to enable a second fuel flow from a second fuel source to the engine of the dual fuel generator, a fuel solenoid having open and closed positions, and a solenoid switch having a closed position to activate the fuel solenoid and an open position, wherein, when the selector switch is in the first fuel mode, the fuel solenoid is in the closed position and, when the selector switch is in the second fuel mode, the solenoid switch is in the open position and the fuel solenoid is in the open position, as called for in claim 1 of U.S. Patent No. 11,761,390.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, the selector switch triggers the solenoid switch when changed from the second fuel mode to the first fuel mode, so as to cause the fuel solenoid to operate in the closed position, as called for in claim 2 of U.S. Patent No. 11,761,390.

c. Dependent claim 3 by specifically including all the aforementioned elements of claim 1 and, in addition, a valve assembly fluidly connectable to each of the first fuel source and the second fuel source, the valve assembly being operable to selectively control the first fuel flow and the second fuel flow from the first fuel source and the second fuel source, respectively, to the engine of the dual fuel generator and positioning of the selector switch in the first fuel mode and the second fuel mode enables a selection of one of

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the first fuel flow and the second fuel flow, as called for in claim 3 of U.S. Patent No. 11,761,390.

d. Dependent claim 4 by specifically including all the aforementioned elements of claim 3 and, in addition, the valve assembly is positioned on or adjacent the selector switch, as called for in claim 4 of U.S. Patent No. 11,761,390.

e. Dependent claim 5 by specifically including all the aforementioned elements of claim 3 and, in addition, the valve assembly includes two fuel inputs, with a first fuel input connectable to the first fuel source and a second fuel input connectable to the second fuel source, and two fuel outputs for selectively supplying fuel to the engine from the first fuel source or the second fuel source, as called for in claim 5 of U.S. Patent No. 11,761,390.

f. Dependent claim 6 by specifically including all the aforementioned elements of claim 5 and, in addition, the two fuel outputs selectively supply fuel to the engine from only the first fuel source or only the second fuel source, responsive to selection of the first fuel flow or the second fuel flow via the selector switch and to a corresponding operation of the valve assembly, as called for in claim 6 of U.S. Patent No. 11,761,390.

g. Dependent claim 7 by specifically including all the aforementioned elements of claim 5 and, in addition, the valve assembly includes a first fuel valve having open and closed positions to selectively control the first fuel flow to the engine and a second fuel valve having open and closed positions to selectively control the second fuel flow to the engine, as called for in claim 7 of U.S. Patent No. 11,761,390.

h. Dependent claim 8 by specifically including all the aforementioned elements of claim 3 and, in addition, the first fuel source is a an LPG fuel source and wherein the second fuel source is a gasoline fuel source, as called for in claim 8 of U.S. Patent No. 11,761,390.

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i. Dependent claim 9 by specifically including all the aforementioned elements of claim 1 and, in addition, the fuel solenoid is a carburetor shutoff solenoid, as called for in claim 9 of U.S. Patent No. 11,761,390.

Therefore, each of the foregoing Firman generator models listed in Paragraph 131(a)-(w) infringes at least claims 1-9 of U.S. Patent No. 11,761,390.

133. Upon information and belief, Firman has been and is now making, using, selling, or offering for sale within the United States, or importing into the United States, the following additional generator models:

a. Model H03654, a dual fuel portable generator;

b. Model H05754, a dual fuel portable generator;

c. Model H07554, a dual fuel portable generator;

d. Model H08052, a dual fuel portable generator;

e. Model T07571F, a refurbished tri fuel portable generator;

f. Model WH02942F, a refurbished dual fuel inverter portable generator;

g. Model WH03242F, a refurbished dual fuel inverter portable generator; and

h. Model WH03342, a dual fuel inverter portable generator.

134. Upon review of images, owner's manuals, and electrical schematics of the foregoing Firman generator models and comparisons of the images, owner's manuals, and electrical schematics of the foregoing Firman generator models to those of the Firman generator models listed in Paragraph 131, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1-9 of U.S. Patent No. 11,761,390. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a selector switch having a first fuel mode configured to enable a first fuel flow from a first fuel source to an engine of a dual fuel generator and a second fuel mode configured to enable a second fuel flow from a second fuel source to the engine of the dual fuel generator, a fuel solenoid having open and closed positions, and a solenoid switch having a closed position to activate the fuel solenoid and an open

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position, wherein, when the selector switch is in the first fuel mode, the fuel solenoid is in the closed position and, when the selector switch is in the second fuel mode, the solenoid switch is in the open position and the fuel solenoid is in the open position, as called for in claim 1 of U.S. Patent No. 11,761,390.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, the selector switch triggers the solenoid switch when changed from the second fuel mode to the first fuel mode, so as to cause the fuel solenoid to operate in the closed position, as called for in claim 2 of U.S. Patent No. 11,761,390.

c. Dependent claim 3 by specifically including all the aforementioned elements of claim 1 and, in addition, a valve assembly fluidly connectable to each of the first fuel source and the second fuel source, the valve assembly being operable to selectively control the first fuel flow and the second fuel flow from the first fuel source and the second fuel source, respectively, to the engine of the dual fuel generator and positioning of the selector switch in the first fuel mode and the second fuel mode enables a selection of one of the first fuel flow and the second fuel flow, as called for in claim 3 of U.S. Patent No. 11,761,390.

d. Dependent claim 4 by specifically including all the aforementioned elements of claim 3 and, in addition, the valve assembly is positioned on or adjacent the selector switch, as called for in claim 4 of U.S. Patent No. 11,761,390.

e. Dependent claim 5 by specifically including all the aforementioned elements of claim 3 and, in addition, the valve assembly includes two fuel inputs, with a first fuel input connectable to the first fuel source and a second fuel input connectable to the second fuel source, and two fuel outputs for selectively supplying fuel to the engine from the first fuel source or the second fuel source, as called for in claim 5 of U.S. Patent No. 11,761,390.

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f. Dependent claim 6 by specifically including all the aforementioned elements of claim 5 and, in addition, the two fuel outputs selectively supply fuel to the engine from only the first fuel source or only the second fuel source, responsive to selection of the first fuel flow or the second fuel flow via the selector switch and to a corresponding operation of the valve assembly, as called for in claim 6 of U.S. Patent No. 11,761,390.

g. Dependent claim 7 by specifically including all the aforementioned elements of claim 5 and, in addition, the valve assembly includes a first fuel valve having open and closed positions to selectively control the first fuel flow to the engine and a second fuel valve having open and closed positions to selectively control the second fuel flow to the engine, as called for in claim 7 of U.S. Patent No. 11,761,390.

h. Dependent claim 8 by specifically including all the aforementioned elements of claim 3 and, in addition, the first fuel source is a an LPG fuel source and wherein the second fuel source is a gasoline fuel source, as called for in claim 8 of U.S. Patent No. 11,761,390.

i. Dependent claim 9 by specifically including all the aforementioned elements of claim 1 and, in addition, the fuel solenoid is a carburetor shutoff solenoid, as called for in claim 9 of U.S. Patent No. 11,761,390.

Therefore, each of the foregoing Firman generator models listed in Paragraph 133(a)-(h) infringes at least claims 1-9 of U.S. Patent No. 11,761,390.

135. Champion has no adequate remedy at law against Firman's acts of infringement and will suffer irreparable harm unless Firman is preliminarily and permanently enjoined from its infringement of U.S. Patent No. 11,761,390.

136. Upon information and belief, Firman's infringement has been willful, deliberate, and with knowledge of Champion's rights under U.S. Patent No. 11,761,390.

137. Firman, by way of its infringing activity, has caused and continues to cause Champion to suffer damages in an amount to be determined at trial.

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COUNT XI: INFRINGEMENT OF U.S. PATENT NO. 11,840,970

138. Paragraphs 1 through 137 are incorporated by reference as if fully set forth herein.

139. U.S. Patent No. 11,840,970 is titled "DUAL FUEL GENERATOR WITH REMOTE REGULATOR." U.S. Patent No. 11,840,970 was duly and legally issued on December 12, 2023. A true and correct copy of U.S. Patent No. 11,840,970 is attached as Exhibit K.

140. Champion is the lawful assignee of the entire right, title, and interest in and to U.S. Patent No. 11,840,970 and possesses all rights of recovery under the patent, including the right to recover damages for past infringement.

141. Champion has acquired and inspected the following Firman generator models that Firman has been and is making, using, selling, or offering for sale within the United States, or importing into the United States:

a. Model WH02942, a dual fuel inverter portable generator;

b. Model WH03041, a dual fuel inverter portable generator;

c. Model WH03042, a dual fuel inverter portable generator;

d. Model WH03242, a dual fuel inverter portable generator; and

e. Model WH03344, a dual fuel inverter portable generator.

142. Upon acquisition, disassembly as needed, review of owner's manuals and electrical schematics, and inspection, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 2, 4, 5, 7, 12-15, 20-24, 26, 27, 29, 44-46, and 48-51 of U.S. Patent No. 11,840,970. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a dual fuel generator and fuel delivery system including a dual fuel generator having an engine configured to operate on a liquid fuel supplied from a liquid fuel source through a liquid fuel line and a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line and a carburetor attached to an intake of the engine to

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mix air and fuel and connect the liquid fuel line to the intake; a fuel regulator system located off board the dual fuel generator, the fuel regulator system including a primary pressure regulator coupled to a service valve of the pressurized fuel source and configured to regulate the fuel supplied from the pressurized fuel source to a reduced pressure and a secondary pressure regulator coupled to the primary pressure regulator and configured to regulate the gaseous fuel supplied from the primary pressure regulator to a desired pressure for delivery through the gaseous fuel line to operate the dual fuel generator; and a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the engine from the liquid fuel source through the liquid fuel line and the pressurized fuel source through the gaseous fuel line, as called for in claim 1 of U.S. Patent No. 11,840,970.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, the carburetor connects the gaseous fuel line to the intake, as called for in claim 2 of U.S. Patent No. 11,840,970.

c. Dependent claim 4 by specifically including all the aforementioned elements of claim 1 and, in addition, the mechanical fuel valve opens and closes the liquid fuel line to selectively control fuel flow from the liquid fuel source to the dual fuel generator and a fuel lockout apparatus is coupled to the mechanical fuel valve and is configured to prevent the pressurized fuel source from coupling to the gaseous fuel line while the mechanical fuel valve opens the liquid fuel line and to permit the pressurized fuel source to couple to the gaseous fuel line while the mechanical fuel valve closes the liquid fuel line, as called for in claim 4 of U.S. Patent No. 11,840,970.

d. Dependent claim 5 by specifically including all the aforementioned elements of claim 4 and, in addition, the fuel lockout apparatus is further configured to prevent the mechanical fuel valve from opening the liquid fuel line while

the dual fuel generator receives fuel from the pressurized fuel source, as called for in claim 5 of U.S. Patent No. 11,840,970.

e. Dependent claim 7 by specifically including all the aforementioned elements of claim 1 and, in addition, a first end of a quick-connect hose coupling coupled to an outlet of the secondary pressure regulator and a second end of the quick-connect hose coupling coupled to an inlet of the gaseous fuel line to mate with the first end of the quick-connect hose coupling to couple the secondary pressure regulator to the gaseous fuel line, as called for in claim 7 of U.S. Patent No. 11,840,970.

f. Independent claim 12 by specifically including a dual fuel generator and fuel delivery system including a dual fuel generator having a generator housing, an alternator mounted within the generator housing, and an engine driving the alternator and mounted within the generator housing, the engine configured to operate on a liquid fuel supplied from a liquid fuel source through a liquid fuel line and a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line; a fuel regulator system located off board the dual fuel generator, the fuel regulator system configured to regulate the gaseous fuel supplied from the pressurized fuel source in a first stage, the gaseous fuel regulated down to a reduced pressure in the first stage and regulate the reduced pressure gaseous fuel in a second stage, the reduced pressure gaseous fuel from the first stage regulated down to a desired pressure in the second stage for delivery through the gaseous fuel line to operate the dual fuel generator; and a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the dual fuel generator from the liquid fuel source through the liquid fuel line and the pressurized fuel source through the gaseous fuel line, wherein the dual fuel generator is free of any pressure regulator mounted within the generator housing, as called for in claim 12 of U.S. Patent No. 11,840,970.

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g. Dependent claim 13 by specifically including all the aforementioned elements of claim 12 and, in addition, the mechanical fuel valve is mounted on or within the generator housing, as called for in claim 13 of U.S. Patent No. 11,840,970.

h. Dependent claim 14 by specifically including all the aforementioned elements of claim 12 and, in addition, the first stage includes a primary pressure regulator coupled to a service valve of the pressurized fuel source and configured to regulate the gaseous fuel supplied from the pressurized fuel source to the reduced pressure and the second stage includes a secondary pressure regulator coupled to the primary pressure regulator and configured to regulate the gaseous fuel supplied from the primary pressure regulator to the desired pressure for delivery through the gaseous fuel line to operate the dual fuel generator, as called for in claim 14 of U.S. Patent No. 11,840,970.

i. Dependent claim 15 by specifically including all the aforementioned elements of claim 14 and, in addition, a first end of a quick-connect hose coupling coupled to an outlet of the secondary pressure regulator and a second end of the quick-connect hose coupling coupled to an inlet of the gaseous fuel line to mate with the first end of the quick-connect hose coupling to couple the secondary pressure regulator to the gaseous fuel line, as called for in claim 15 of U.S. Patent No. 11,840,970.

j. Independent claim 20 by specifically including a dual fuel generator and fuel delivery system including a dual fuel generator configured to operate on a liquid fuel supplied from a liquid fuel source through a liquid fuel line and a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line, the dual fuel generator having a gaseous fuel valve coupled to an inlet of the gaseous fuel line and connectable to the pressurized fuel source and a mechanical fuel valve actuatable between a first position and a second

position to selectively control fuel flow to the dual fuel generator from the liquid fuel source through the liquid fuel line and the pressurized fuel source through the gaseous fuel line; and a fuel regulator system located off board the dual fuel generator, the fuel regulator system having a primary pressure regulator connectable to a service valve of the pressurized fuel source and configured to regulate the fuel supplied from the pressurized fuel source to a reduced pressure and a secondary pressure regulator coupled to the primary pressure regulator and connectable to the gaseous fuel valve, the secondary pressure regulator configured to regulate the gaseous fuel supplied from the primary pressure regulator to a desired pressure for delivery through the gaseous fuel line to operate the dual fuel generator, as called for in claim 20 of U.S. Patent No. 11,840,970.

k. Dependent claim 21 by specifically including all the aforementioned elements of claim 20 and, in addition, the pressurized fuel source is independent and disconnected from the dual fuel generator, as called for in claim 21 of U.S. Patent No. 11,840,970.

l. Dependent claim 22 by specifically including all the aforementioned elements of claim 21 and, in addition, the fuel regulator system is disconnected from the dual fuel generator, as called for in claim 22 of U.S. Patent No. 11,840,970.

m. Dependent claim 23 by specifically including all the aforementioned elements of claim 21 and, in addition, the primary pressure regulator is disconnected from the pressurized fuel source, as called for in claim 23 of U.S. Patent No. 11,840,970.

n. Dependent claim 24 by specifically including all the aforementioned elements of claim 20 and, in addition, the gaseous fuel valve comprises at least one end of a quick-connect hose coupling mounted to an external

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surface of the dual fuel generator, as called for in claim 24 of U.S. Patent No. 11,840,970.

o. Dependent claim 26 by specifically including all the aforementioned elements of claim 20 and, in addition, the mechanical fuel valve opens and closes the liquid fuel line to selectively control fuel flow from the liquid fuel source to the dual fuel generator and a fuel lockout apparatus is coupled to the mechanical fuel valve and configured to prevent the pressurized fuel source from coupling to the gaseous fuel line while the mechanical fuel valve opens the liquid fuel line and to permit the pressurized fuel source to couple to the gaseous fuel line while the mechanical fuel valve closes the liquid fuel line, as called for in claim 26 of U.S. Patent No. 11,840,970.

p. Dependent claim 27 by specifically including all the aforementioned elements of claim 26 and, in addition, the fuel lockout apparatus is further configured to prevent the mechanical fuel valve from opening the liquid fuel line while the dual fuel generator receives fuel from the pressurized fuel source, as called for in claim 27 of U.S. Patent No. 11,840,970.

q. Dependent claim 29 by specifically including all the aforementioned elements of claim 20 and, in addition, the gaseous fuel valve includes a first end of a quick-connect hose coupling coupled to an outlet of the secondary pressure regulator and a second end of the quick-connect hose coupling coupled to an inlet of the gaseous fuel line to mate with the first end of the quick-connect hose coupling to couple the secondary pressure regulator to the gaseous fuel line, as called for in claim 29 of U.S. Patent No. 11,840,970.

r. Independent claim 44 by specifically including a dual fuel generator including an alternator, a dual fuel engine coupled to drive the alternator and configured to operate on a liquid fuel supplied from a liquid fuel source and a gaseous fuel supplied from a pressurized fuel source, a liquid fuel line coupled to the dual fuel engine to provide the liquid fuel from the liquid fuel

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source, a gaseous fuel line coupled to the dual fuel engine to provide the gaseous fuel from the pressurized fuel source, and a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the dual fuel engine from the liquid fuel source through the liquid fuel line and the pressurized fuel source through the gaseous fuel line, wherein the dual fuel generator is free from any gaseous fuel pressure regulator, as called for in claim 44 of U.S. Patent No. 11,840,970.

s. Dependent claim 45 by specifically including all the aforementioned elements of claim 44 and, in addition, a gaseous fuel valve coupled to an inlet of the gaseous fuel line to connect the pressurized fuel source thereto, as called for in claim 45 of U.S. Patent No. 11,840,970.

t. Dependent claim 46 by specifically including all the aforementioned elements of claim 45 and, in addition, a generator housing surrounding at least the dual fuel engine and the alternator with the gaseous fuel valve mounted on or within the generator housing, as called for in claim 46 of U.S. Patent No. 11,840,970.

u. Dependent claim 48 by specifically including all the aforementioned elements of claim 44 and, in addition, the mechanical fuel valve includes a liquid fuel valve coupled to the liquid fuel line and a gaseous fuel valve coupled to the gaseous fuel line, as called for in claim 48 of U.S. Patent No. 11,840,970.

v. Dependent claim 49 by specifically including all the aforementioned elements of claim 44 and, in addition, a first end of a quick-connect hose coupling coupled to an outlet of the pressurized fuel source and a second end of the quick-connect hose coupling coupled to an inlet of the gaseous fuel line to mate with the first end of the quick-connect hose coupling to couple the pressurized fuel source to the gaseous fuel line, as called for in claim 49 of U.S. Patent No. 11,840,970.

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w. Dependent claim 50 by specifically including all the aforementioned elements of claim 44 and, in addition, the mechanical fuel valve opens and closes the liquid fuel line to selectively control fuel flow from the liquid fuel source to the dual fuel engine and a fuel lockout apparatus is coupled to the mechanical fuel valve and configured to prevent the pressurized fuel source from coupling to the gaseous fuel line while the mechanical fuel valve opens the liquid fuel line and to permit the pressurized fuel source to couple to the gaseous fuel line while the mechanical fuel valve closes the liquid fuel line, as called for in claim 50 of U.S. Patent No. 11,840,970.

x. Dependent claim 51 by specifically including all the aforementioned elements of claim 50 and, in addition, the fuel lockout apparatus is further configured to prevent the mechanical fuel valve from opening the liquid fuel line while the dual fuel generator receives fuel from the pressurized fuel source, as called for in claim 51 of U.S. Patent No. 11,840,970.

Therefore, each of the foregoing Firman generator models listed in Paragraph 141(a)-(e) infringes at least claims 1, 2, 4, 5, 7, 12-15, 20-24, 26, 27, 29, 44-46, and 48-51 of U.S. Patent No. 11,840,970.

143. Upon information and belief, Firman has been and is now making, using, selling, or offering for sale within the United States, or importing into the United States, the following additional generator models:

a. Model WH02942F, a refurbished dual fuel inverter portable generator;

b. Model WH03242F, a refurbished dual fuel inverter portable generator; and

c. Model WH03342, a dual fuel inverter portable generator.

144. Upon review of images, owner's manuals, and electrical schematics of the foregoing Firman generator models and comparisons of the images, owner's manuals, and electrical schematics of the foregoing Firman generator models to those of the Firman generator models listed in Paragraph 141, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 2, 4, 5, 7, 12-15,

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20-24, 26, 27, 29, 44-46, and 48-51 of U.S. Patent No. 11,840,970. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a dual fuel generator and fuel delivery system including a dual fuel generator having an engine configured to operate on a liquid fuel supplied from a liquid fuel source through a liquid fuel line and a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line and a carburetor attached to an intake of the engine to mix air and fuel and connect the liquid fuel line to the intake; a fuel regulator system located off board the dual fuel generator, the fuel regulator system including a primary pressure regulator coupled to a service valve of the pressurized fuel source and configured to regulate the fuel supplied from the pressurized fuel source to a reduced pressure and a secondary pressure regulator coupled to the primary pressure regulator and configured to regulate the gaseous fuel supplied from the primary pressure regulator to a desired pressure for delivery through the gaseous fuel line to operate the dual fuel generator; and a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the engine from the liquid fuel source through the liquid fuel line and the pressurized fuel source through the gaseous fuel line, as called for in claim 1 of U.S. Patent No. 11,840,970.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, the carburetor connects the gaseous fuel line to the intake, as called for in claim 2 of U.S. Patent No. 11,840,970.

c. Dependent claim 4 by specifically including all the aforementioned elements of claim 1 and, in addition, the mechanical fuel valve opens and closes the liquid fuel line to selectively control fuel flow from the liquid fuel source to the dual fuel generator and a fuel lockout apparatus is coupled to the mechanical fuel valve and is configured to prevent the pressurized fuel

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source from coupling to the gaseous fuel line while the mechanical fuel valve opens the liquid fuel line and to permit the pressurized fuel source to couple to the gaseous fuel line while the mechanical fuel valve closes the liquid fuel line, as called for in claim 4 of U.S. Patent No. 11,840,970.

d. Dependent claim 5 by specifically including all the aforementioned elements of claim 4 and, in addition, the fuel lockout apparatus is further configured to prevent the mechanical fuel valve from opening the liquid fuel line while the dual fuel generator receives fuel from the pressurized fuel source, as called for in claim 5 of U.S. Patent No. 11,840,970.

e. Dependent claim 7 by specifically including all the aforementioned elements of claim 1 and, in addition, a first end of a quick-connect hose coupling coupled to an outlet of the secondary pressure regulator and a second end of the quick-connect hose coupling coupled to an inlet of the gaseous fuel line to mate with the first end of the quick-connect hose coupling to couple the secondary pressure regulator to the gaseous fuel line, as called for in claim 7 of U.S. Patent No. 11,840,970.

f. Independent claim 12 by specifically including a dual fuel generator and fuel delivery system including a dual fuel generator having a generator housing, an alternator mounted within the generator housing, and an engine driving the alternator and mounted within the generator housing, the engine configured to operate on a liquid fuel supplied from a liquid fuel source through a liquid fuel line and a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line; a fuel regulator system located off board the dual fuel generator, the fuel regulator system configured to regulate the gaseous fuel supplied from the pressurized fuel source in a first stage, the gaseous fuel regulated down to a reduced pressure in the first stage and regulate the reduced pressure gaseous fuel in a second stage, the reduced pressure gaseous fuel from the first stage regulated down to a desired

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pressure in the second stage for delivery through the gaseous fuel line to operate the dual fuel generator; and a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the dual fuel generator from the liquid fuel source through the liquid fuel line and the pressurized fuel source through the gaseous fuel line, wherein the dual fuel generator is free of any pressure regulator mounted within the generator housing, as called for in claim 12 of U.S. Patent No. 11,840,970.

g. Dependent claim 13 by specifically including all the aforementioned elements of claim 12 and, in addition, the mechanical fuel valve is mounted on or within the generator housing, as called for in claim 13 of U.S. Patent No. 11,840,970.

h. Dependent claim 14 by specifically including all the aforementioned elements of claim 12 and, in addition, the first stage includes a primary pressure regulator coupled to a service valve of the pressurized fuel source and configured to regulate the gaseous fuel supplied from the pressurized fuel source to the reduced pressure and the second stage includes a secondary pressure regulator coupled to the primary pressure regulator and configured to regulate the gaseous fuel supplied from the primary pressure regulator to the desired pressure for delivery through the gaseous fuel line to operate the dual fuel generator, as called for in claim 14 of U.S. Patent No. 11,840,970.

i. Dependent claim 15 by specifically including all the aforementioned elements of claim 14 and, in addition, a first end of a quick-connect hose coupling coupled to an outlet of the secondary pressure regulator and a second end of the quick-connect hose coupling coupled to an inlet of the gaseous fuel line to mate with the first end of the quick-connect hose coupling to couple the secondary pressure regulator to the gaseous fuel line, as called for in claim 15 of U.S. Patent No. 11,840,970.

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j. Independent claim 20 by specifically including a dual fuel generator and fuel delivery system including a dual fuel generator configured to operate on a liquid fuel supplied from a liquid fuel source through a liquid fuel line and a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line, the dual fuel generator having a gaseous fuel valve coupled to an inlet of the gaseous fuel line and connectable to the pressurized fuel source and a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the dual fuel generator from the liquid fuel source through the liquid fuel line and the pressurized fuel source through the gaseous fuel line; and a fuel regulator system located off board the dual fuel generator, the fuel regulator system having a primary pressure regulator connectable to a service valve of the pressurized fuel source and configured to regulate the fuel supplied from the pressurized fuel source to a reduced pressure and a secondary pressure regulator coupled to the primary pressure regulator and connectable to the gaseous fuel valve, the secondary pressure regulator configured to regulate the gaseous fuel supplied from the primary pressure regulator to a desired pressure for delivery through the gaseous fuel line to operate the dual fuel generator, as called for in claim 20 of U.S. Patent No. 11,840,970.

k. Dependent claim 21 by specifically including all the aforementioned elements of claim 20 and, in addition, the pressurized fuel source is independent and disconnected from the dual fuel generator, as called for in claim 21 of U.S. Patent No. 11,840,970.

l. Dependent claim 22 by specifically including all the aforementioned elements of claim 21 and, in addition, the fuel regulator system is disconnected from the dual fuel generator, as called for in claim 22 of U.S. Patent No. 11,840,970.

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m. Dependent claim 23 by specifically including all the aforementioned elements of claim 21 and, in addition, the primary pressure regulator is disconnected from the pressurized fuel source, as called for in claim 23 of U.S. Patent No. 11,840,970.

n. Dependent claim 24 by specifically including all the aforementioned elements of claim 20 and, in addition, the gaseous fuel valve comprises at least one end of a quick-connect hose coupling mounted to an external surface of the dual fuel generator, as called for in claim 24 of U.S. Patent No. 11,840,970.

o. Dependent claim 26 by specifically including all the aforementioned elements of claim 20 and, in addition, the mechanical fuel valve opens and closes the liquid fuel line to selectively control fuel flow from the liquid fuel source to the dual fuel generator and a fuel lockout apparatus is coupled to the mechanical fuel valve and configured to prevent the pressurized fuel source from coupling to the gaseous fuel line while the mechanical fuel valve opens the liquid fuel line and to permit the pressurized fuel source to couple to the gaseous fuel line while the mechanical fuel valve closes the liquid fuel line, as called for in claim 26 of U.S. Patent No. 11,840,970.

p. Dependent claim 27 by specifically including all the aforementioned elements of claim 26 and, in addition, the fuel lockout apparatus is further configured to prevent the mechanical fuel valve from opening the liquid fuel line while the dual fuel generator receives fuel from the pressurized fuel source, as called for in claim 27 of U.S. Patent No. 11,840,970.

q. Dependent claim 29 by specifically including all the aforementioned elements of claim 20 and, in addition, the gaseous fuel valve includes a first end of a quick-connect hose coupling coupled to an outlet of the secondary pressure regulator and a second end of the quick-connect hose coupling coupled to an inlet of the gaseous fuel line to mate with the first end of the

quick-connect hose coupling to couple the secondary pressure regulator to the gaseous fuel line, as called for in claim 29 of U.S. Patent No. 11,840,970.

r. Independent claim 44 by specifically including a dual fuel generator including an alternator, a dual fuel engine coupled to drive the alternator and configured to operate on a liquid fuel supplied from a liquid fuel source and a gaseous fuel supplied from a pressurized fuel source, a liquid fuel line coupled to the dual fuel engine to provide the liquid fuel from the liquid fuel source, a gaseous fuel line coupled to the dual fuel engine to provide the gaseous fuel from the pressurized fuel source, and a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the dual fuel engine from the liquid fuel source through the liquid fuel line and the pressurized fuel source through the gaseous fuel line, wherein the dual fuel generator is free from any gaseous fuel pressure regulator, as called for in claim 44 of U.S. Patent No. 11,840,970.

s. Dependent claim 45 by specifically including all the aforementioned elements of claim 44 and, in addition, a gaseous fuel valve coupled to an inlet of the gaseous fuel line to connect the pressurized fuel source thereto, as called for in claim 45 of U.S. Patent No. 11,840,970.

t. Dependent claim 46 by specifically including all the aforementioned elements of claim 45 and, in addition, a generator housing surrounding at least the dual fuel engine and the alternator with the gaseous fuel valve mounted on or within the generator housing, as called for in claim 46 of U.S. Patent No. 11,840,970.

u. Dependent claim 48 by specifically including all the aforementioned elements of claim 44 and, in addition, the mechanical fuel valve includes a liquid fuel valve coupled to the liquid fuel line and a gaseous fuel valve coupled to the gaseous fuel line, as called for in claim 48 of U.S. Patent No. 11,840,970.

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v. Dependent claim 49 by specifically including all the aforementioned elements of claim 44 and, in addition, a first end of a quick-connect hose coupling coupled to an outlet of the pressurized fuel source and a second end of the quick-connect hose coupling coupled to an inlet of the gaseous fuel line to mate with the first end of the quick-connect hose coupling to couple the pressurized fuel source to the gaseous fuel line, as called for in claim 49 of U.S. Patent No. 11,840,970.

w. Dependent claim 50 by specifically including all the aforementioned elements of claim 44 and, in addition, the mechanical fuel valve opens and closes the liquid fuel line to selectively control fuel flow from the liquid fuel source to the dual fuel engine and a fuel lockout apparatus is coupled to the mechanical fuel valve and configured to prevent the pressurized fuel source from coupling to the gaseous fuel line while the mechanical fuel valve opens the liquid fuel line and to permit the pressurized fuel source to couple to the gaseous fuel line while the mechanical fuel valve closes the liquid fuel line, as called for in claim 50 of U.S. Patent No. 11,840,970.

x. Dependent claim 51 by specifically including all the aforementioned elements of claim 50 and, in addition, the fuel lockout apparatus is further configured to prevent the mechanical fuel valve from opening the liquid fuel line while the dual fuel generator receives fuel from the pressurized fuel source, as called for in claim 51 of U.S. Patent No. 11,840,970.

Therefore, each of the foregoing Firman generator models listed in Paragraph 143(a)-(c) infringes at least claims 1, 2, 4, 5, 7, 12-15, 20-24, 26, 27, 29, 44-46, and 48-51 of U.S. Patent No. 11,840,970.

145. Champion has no adequate remedy at law against Firman's acts of infringement and will suffer irreparable harm unless Firman is preliminarily and permanently enjoined from its infringement of U.S. Patent No. 11,840,970.

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146. Upon information and belief, Firman's infringement has been willful, deliberate, and with knowledge of Champion's rights under U.S. Patent No. 11,840,970.

147. Firman, by way of its infringing activity, has caused and continues to cause Champion to suffer damages in an amount to be determined at trial.

COUNT XII: INFRINGEMENT OF U.S. PATENT NO. 11,905,895

148. Paragraphs 1 through 147 are incorporated by reference as if fully set forth herein.

149. U.S. Patent No. 11,905,895 is titled "DUAL FUEL LOCKOUT SWITCH FOR GENERATOR ENGINE." U.S. Patent No. 11,905,895 was duly and legally issued on February 20, 2024. A true and correct copy of U.S. Patent No. 11,905,895 is attached as Exhibit L.

150. Champion is the lawful assignee of the entire right, title, and interest in and to U.S. Patent No. 11,905,895 and possesses all rights of recovery under the patent, including the right to recover damages for past infringement.

151. Champion has acquired and inspected the following Firman generator models that Firman has been and is making, using, selling, or offering for sale within the United States, or importing into the United States:

a. Model H03651, a dual fuel portable generator;

b. Model H03652, a dual fuel portable generator;

c. Model H05751, a dual fuel portable generator;

d. Model H05752, a dual fuel portable generator;

e. Model H05753, a dual fuel portable generator;

f. Model H07552, a dual fuel portable generator;

g. Model H07553, a dual fuel portable generator;

h. Model H08051, a dual fuel portable generator;

i. Model H08053, a dual fuel portable generator;

j. Model T04073, a tri fuel portable generator;

k. Model T07571, a tri fuel portable generator;

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l. Model T07573, a tri fuel portable generator;

m. Model T08071, a tri fuel portable generator;

n. Model T08072, a tri fuel portable generator;

o. Model T09275, a tri fuel portable generator;

p. Model T09371, a tri fuel portable generator;

q. Model WH02942, a dual fuel inverter portable generator;

r. Model WH03041, a dual fuel inverter portable generator;

s. Model WH03042, a dual fuel inverter portable generator;

t. Model WH03242, a dual fuel inverter portable generator;

u. Model WH03344, a dual fuel inverter portable generator;

v. Model WH03562OF, a dual fuel open frame inverter portable generator; and

w. Model WH03662OF, a dual fuel open frame inverter portable generator.

152. Upon acquisition, disassembly as needed, review of owner's manuals and electrical schematics, and inspection, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 2, 6, 8, 12, 14, and 15 of U.S. Patent No. 11,905,895. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a mechanical fuel lockout switch for a dual fuel engine having a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the dual fuel engine from a first fuel source through a first fuel line and a second fuel source through a second fuel line, the mechanical fuel valve configured to allow communication between the first fuel source and the dual fuel engine and prevent communication between the second fuel source and the dual fuel engine while in the first position and prevent communication between the first fuel source and the dual fuel engine while in the second position; and a fuel lockout apparatus coupled to the mechanical fuel valve and configured to prevent the second fuel source from coupling to the second fuel line while the mechanical fuel valve is in the first

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position and permit the second fuel source to couple to the second fuel line while the mechanical fuel valve is in the second position, as called for in claim 1 of U.S. Patent No. 11,905,895.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, the fuel lockout apparatus prevents actuation of the mechanical fuel valve to the first position when the second fuel source is in communication with the dual fuel engine, as called for in claim 2 of U.S. Patent No. 11,905,895.

c. Dependent claim 6 by specifically including all the aforementioned elements of claim 1 and, in addition, the mechanical fuel valve and the fuel lockout apparatus operate together to ensure that fuel from the first fuel source and fuel from the second fuel source are not simultaneously delivered to the dual fuel engine, as called for in claim 6 of U.S. Patent No. 11,905,895.

d. Independent claim 8 by specifically including a mechanical fuel lockout switch for a dual fuel engine having a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the dual fuel engine from a first fuel source through a first fuel line and a second fuel source through a second fuel line, the mechanical fuel valve configured to allow communication between the first fuel source and the dual fuel engine and prevent communication between the second fuel source and the dual fuel engine while the first position and prevent communication between the first fuel source and the dual fuel engine while in the second position; and a fuel lockout apparatus coupled to the mechanical fuel valve and configured to prevent actuation of the mechanical fuel valve to the first position when the second fuel source is in communication with the dual fuel engine, as called for in claim 8 of U.S. Patent No. 11,905,895.

e. Dependent claim 12 by specifically including all the aforementioned elements of claim 8 and, in addition, the mechanical fuel valve and the fuel

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lockout apparatus operate together to ensure that fuel from the first fuel source and fuel from the second fuel source are not simultaneously delivered to the dual fuel engine, as called for in claim 12 of U.S. Patent No. 11,905,895.

f. Independent claim 14 by specifically including a dual fuel generator and fuel delivery system having a dual fuel generator configured to operate on a liquid fuel supplied from a liquid fuel source through a liquid fuel line and a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line; a fuel regulator system located off board the dual fuel generator, the fuel regulator system including a primary pressure regulator couplable to a service valve of the pressurized fuel source and configured to regulate the gaseous fuel supplied from the pressurized fuel source to a reduced pressure and a secondary pressure regulator couplable to the primary pressure regulator and configured to regulate the gaseous fuel supplied from the primary pressure regulator to a desired pressure for delivery through the gaseous fuel line to operate the dual fuel generator; a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the dual fuel generator from the liquid fuel source through the liquid fuel line and the pressurized fuel source through the gaseous fuel line, the mechanical fuel valve configured to open and close the liquid fuel line to selectively control fuel flow from the liquid fuel source to the dual fuel generator; and a fuel lockout apparatus coupled to the mechanical fuel valve and configured to prevent the pressurized fuel source from coupling to the gaseous fuel line while the liquid fuel line is open and permit the pressurized fuel source to couple to the gaseous fuel line while the liquid fuel line is closed by the mechanical fuel valve, as called for in claim 14 of U.S. Patent No. 11,905,895.

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g. Dependent claim 15 by specifically including all the aforementioned elements of claim 14 and, in addition, the fuel lockout apparatus is further configured to prevent the mechanical fuel valve from opening the liquid fuel line while the fuel regulator system is coupled to the gaseous fuel line, as called for in claim 15 of U.S. Patent No. 11,905,895.

Therefore, each of the foregoing Firman generator models listed in Paragraph 151(a)-(w) infringes at least claims 1, 2, 6, 8, 12, 14, and 15 of U.S. Patent No. 11,905,895.

153. Upon information and belief, Firman has been and is now making, using, selling, or offering for sale within the United States, or importing into the United States, the following additional generator models:

a. Model H03654, a dual fuel portable generator;

b. Model H05754, a dual fuel portable generator;

c. Model H07554, a dual fuel portable generator;

d. Model H08052, a dual fuel portable generator;

e. Model T07571F, a refurbished tri fuel portable generator;

f. Model WH02942F, a refurbished dual fuel inverter portable generator;

g. Model WH03242F, a refurbished dual fuel inverter portable generator; and

h. Model WH03342, a dual fuel inverter portable generator.

154. Upon review of images, owner's manuals, and electrical schematics of the foregoing Firman generator models and comparisons of the images, owner's manuals, and electrical schematics of the foregoing Firman generator models to those of the Firman generator models listed in Paragraph 151, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 1, 2, 6, 8, 12, 14, and 15 of U.S. Patent No. 11,905,895. Each of the foregoing Firman generator models infringes:

a. Independent claim 1 by specifically including a mechanical fuel lockout switch for a dual fuel engine having a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow

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to the dual fuel engine from a first fuel source through a first fuel line and a second fuel source through a second fuel line, the mechanical fuel valve configured to allow communication between the first fuel source and the dual fuel engine and prevent communication between the second fuel source and the dual fuel engine while in the first position and prevent communication between the first fuel source and the dual fuel engine while in the second position; and a fuel lockout apparatus coupled to the mechanical fuel valve and configured to prevent the second fuel source from coupling to the second fuel line while the mechanical fuel valve is in the first position and permit the second fuel source to couple to the second fuel line while the mechanical fuel valve is in the second position, as called for in claim 1 of U.S. Patent No. 11,905,895.

b. Dependent claim 2 by specifically including all the aforementioned elements of claim 1 and, in addition, the fuel lockout apparatus prevents actuation of the mechanical fuel valve to the first position when the second fuel source is in communication with the dual fuel engine, as called for in claim 2 of U.S. Patent No. 11,905,895.

c. Dependent claim 6 by specifically including all the aforementioned elements of claim 1 and, in addition, the mechanical fuel valve and the fuel lockout apparatus operate together to ensure that fuel from the first fuel source and fuel from the second fuel source are not simultaneously delivered to the dual fuel engine, as called for in claim 6 of U.S. Patent No. 11,905,895.

d. Independent claim 8 by specifically including a mechanical fuel lockout switch for a dual fuel engine having a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the dual fuel engine from a first fuel source through a first fuel line and a second fuel source through a second fuel line, the mechanical fuel valve configured to allow communication between the first fuel source and the

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dual fuel engine and prevent communication between the second fuel source and the dual fuel engine while the first position and prevent communication between the first fuel source and the dual fuel engine while in the second position; and a fuel lockout apparatus coupled to the mechanical fuel valve and configured to prevent actuation of the mechanical fuel valve to the first position when the second fuel source is in communication with the dual fuel engine, as called for in claim 8 of U.S. Patent No. 11,905,895.

e. Dependent claim 12 by specifically including all the aforementioned elements of claim 8 and, in addition, the mechanical fuel valve and the fuel lockout apparatus operate together to ensure that fuel from the first fuel source and fuel from the second fuel source are not simultaneously delivered to the dual fuel engine, as called for in claim 12.

f. Independent claim 14 by specifically including a dual fuel generator and fuel delivery system having a dual fuel generator configured to operate on a liquid fuel supplied from a liquid fuel source through a liquid fuel line and a gaseous fuel supplied from a pressurized fuel source through a gaseous fuel line; a fuel regulator system located off board the dual fuel generator, the fuel regulator system including a primary pressure regulator couplable to a service valve of the pressurized fuel source and configured to regulate the gaseous fuel supplied from the pressurized fuel source to a reduced pressure and a secondary pressure regulator couplable to the primary pressure regulator and configured to regulate the gaseous fuel supplied from the primary pressure regulator to a desired pressure for delivery through the gaseous fuel line to operate the dual fuel generator; a mechanical fuel valve actuatable between a first position and a second position to selectively control fuel flow to the dual fuel generator from the liquid fuel source through the liquid fuel line and the pressurized fuel source through the gaseous fuel line, the mechanical fuel valve configured to open and close

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the liquid fuel line to selectively control fuel flow from the liquid fuel source to the dual fuel generator; and a fuel lockout apparatus coupled to the mechanical fuel valve and configured to prevent the pressurized fuel source from coupling to the gaseous fuel line while the liquid fuel line is open and permit the pressurized fuel source to couple to the gaseous fuel line while the liquid fuel line is closed by the mechanical fuel valve, as called for in claim 14 of U.S. Patent No. 11,905,895.

g. Dependent claim 15 by specifically including all the aforementioned elements of claim 14 and, in addition, the fuel lockout apparatus is further configured to prevent the mechanical fuel valve from opening the liquid fuel line while the fuel regulator system is coupled to the gaseous fuel line, as called for in claim 15 of U.S. Patent No. 11,905,895.

Therefore, each of the foregoing Firman generator models listed in Paragraph 153(a)-(h) infringes at least claims 1, 2, 6, 8, 12, 14, and 15 of U.S. Patent No. 11,905,895.

155. Champion has no adequate remedy at law against Firman's acts of infringement and will suffer irreparable harm unless Firman is preliminarily and permanently enjoined from its infringement of U.S. Patent No. 11,905,895.

156. Upon information and belief, Firman's infringement has been willful, deliberate, and with knowledge of Champion's rights under U.S. Patent No. 11,905,895.

157. Firman, by way of its infringing activity, has caused and continues to cause Champion to suffer damages in an amount to be determined at trial.

COUNT XIII: INFRINGEMENT OF U.S. PATENT NO. 11,905,896

158. Paragraphs 1 through 157 are incorporated by reference as if fully set forth herein.

159. U.S. Patent No. 11,905,896 is titled "DUAL FUEL SELECTOR SWITCH." U.S. Patent No. 11,905,896 was duly and legally issued on February 20, 2024. A true and correct copy of U.S. Patent No. 11,905,896 is attached as Exhibit M.

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160. Champion is the lawful assignee of the entire right, title, and interest in and to U.S. Patent No. 11,905,896 and possesses all rights of recovery under the patent, including the right to recover damages for past infringement.

161. Champion has acquired and inspected the following Firman generator models that Firman has been and is making, using, selling, or offering for sale within the United States, or importing into the United States:

a. Model H03651, a dual fuel portable generator;

b. Model H03652, a dual fuel portable generator;

c. Model H05751, a dual fuel portable generator;

d. Model H05752, a dual fuel portable generator;

e. Model H05753, a dual fuel portable generator;

f. Model H07552, a dual fuel portable generator;

g. Model H07553, a dual fuel portable generator;

h. Model H08051, a dual fuel portable generator;

i. Model H08053, a dual fuel portable generator;

j. Model T04073, a tri fuel portable generator;

k. Model T07571, a tri fuel portable generator;

l. Model T07573, a tri fuel portable generator;

m. Model T08071, a tri fuel portable generator;

n. Model T08072, a tri fuel portable generator;

o. Model T09275, a tri fuel portable generator;

p. Model T09371, a tri fuel portable generator;

q. Model WH03562OF, a dual fuel open frame inverter portable generator; and

r. Model WH03662OF, a dual fuel open frame inverter portable generator.

162. Upon acquisition, disassembly as needed, review of owner's manuals and electrical schematics, and inspection, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 30-32, 36, and 37 of U.S. Patent No. 11,905,896. Each of the foregoing Firman generator models infringes:

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a. Independent claim 30 by specifically including a fuel selector for use with a dual fuel generator, the fuel selector having a valve assembly fluidly couplable to each of a first fuel source and a second fuel source and operable to selectively control a first fuel flow and a second fuel flow from the first fuel source and the second fuel source, respectively, to an engine of the dual fuel generator, the valve assembly having two fuel inputs including a first fuel input couplable to the first fuel source and a second fuel input couplable to the second fuel source and two fuel outputs configured to selectively supply fuel to the engine from the first fuel source or the second fuel source; and a selector switch positioned on the valve assembly to allow a user to manually select the first fuel flow or the second fuel flow, as called for in claim 30 of U.S. Patent No. 11,905,896.

b. Dependent claim 31 by specifically including all the aforementioned elements of claim 30 and, in addition, the two fuel outputs are configured to selectively supply fuel to the engine from only one of the first and second fuel sources responsive to selection of the first fuel flow or the second fuel flow via the selector switch and a corresponding operation of the valve assembly, as called for in claim 31 of U.S. Patent No. 11,905,896.

c. Dependent claim 32 by specifically including all the aforementioned elements of claim 30 and, in addition, the valve assembly has a first fuel valve having open and closed positions to selectively control the first fuel flow to the engine and a second fuel valve having open and closed positions to selectively control the second fuel flow to the engine, as called for in claim 32 of U.S. Patent No. 11,905,896.

d. Dependent claim 36 by specifically including the all the aforementioned elements of claim 30 and, in addition, a carburetor solenoid switch configured to activate an associated carburetor solenoid when actuate, as called for in claim 36 of U.S. Patent No. 11,905,896.

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e. Dependent claim 37 by specifically including all the aforementioned elements of claim 36 and, in addition, when the selector switch is in a first position, the selector switch actuates the carburetor solenoid switch so as to activate the carburetor solenoid and prohibit the second fuel flow to the engine, as called for in claim 37 of U.S. Patent No. 11,905,896.

Therefore, each of the Firman generator models listed in Paragraph 161(a)-(r) infringes at least claims 30-32, 36, and 37 of U.S. Patent No. 11,905,896.

163. Champion has acquired and inspected the following Firman generator models that Firman has been and is making, using, selling, or offering for sale within the United States, or importing into the United States:

a. Model WH02942, a dual fuel inverter portable generator;

b. Model WH03041, a dual fuel inverter portable generator;

c. Model WH03042, a dual fuel inverter portable generator;

d. Model WH03242, a dual fuel inverter portable generator; and

e. Model WH03344, a dual fuel inverter portable generator,

164. Upon acquisition, disassembly as needed, review of owner's manuals and electrical schematics, and inspection, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 21-28, 30, 32, 35, and 37 of U.S. Patent No. 11,905,896. Each of the foregoing Firman generator models infringes:

a. Independent claim 21 by specifically including fuel selector of a dual fuel generator having a valve assembly fluidly couplable to each of a first fuel source and a second fuel source and operable to selectively control a first fuel flow and a second fuel flow from the first fuel source and the second fuel source, respectively, to an engine of the dual fuel generator; a selector switch having a first fuel mode and a second fuel mode; a fuel solenoid having open and closed positions; and a solenoid switch having open and closed positions; wherein, when the selector switch is in the first fuel mode, the solenoid switch and the fuel solenoid are in the closed positions;

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wherein, when the selector switch is in the second fuel mode, the solenoid switch and the fuel solenoid are in the open positions, and wherein positioning of the selector switch in the first fuel mode and the second fuel mode enables a selection of the first fuel flow or the second fuel flow, as called for in claim 21 of U.S. Patent No. 11,905,896.

b. Dependent claim 22 by specifically including all the aforementioned elements of claim 21 and, in addition, positioning the selector switch in the first fuel mode enables the selection of the first fuel flow and positioning the selector switch in the second fuel mode enables the selection of the second fuel flow, as called for in claim 22 of U.S. Patent No. 11,905,896.

c. Dependent claim 23 by specifically including all the aforementioned elements of claim 21 and, in addition, the selector switch triggers the solenoid switch when changed from the second fuel mode to the first fuel mode so as to cause the solenoid switch and the fuel solenoid to operate in the closed positions, as called for in claim 23 of U.S. Patent No. 11,905,896.

d. Dependent claim 24 by specifically including all the aforementioned elements of claim 21 and, in addition, the fuel solenoid is a carburetor shutoff solenoid, as called for in claim 24 of U.S. Patent No. 11,905,896.

e. Dependent claim 25 by specifically including all the aforementioned elements of claim 21 and, in addition, the selector switch is positioned adjacent to the valve assembly, as called for in claim 25 of U.S. Patent No. 11,905,896.

f. Dependent claim 26 by specifically including all the aforementioned elements of claim 21 and, in addition, the valve assembly has two fuel inputs including a first fuel input couplable to the first fuel source and a second fuel input couplable to the second fuel source and two fuel outputs for selectively supplying fuel to the engine from the first fuel source or the second fuel source, as called for in claim 26 of U.S. Patent No. 11,905,896.

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g. Dependent claim 27 by specifically including all the aforementioned elements of claim 26 and, in addition, the two fuel outputs selectively supply fuel to the engine from only one of the first and second fuel sources responsive to selection of the first fuel flow or the second fuel flow via the selector switch and a corresponding operation of the valve assembly, as called for in claim 27 of U.S. Patent No. 11,905,896.

h. Dependent claim 28 by specifically including all the aforementioned elements of claim 26 and, in addition, the valve assembly has a first fuel valve having open and closed positions to selectively control the first fuel flow to the engine and a second fuel valve having open and closed positions to selectively control the second fuel flow to the engine, as called for in claim 28 of U.S. Patent No. 11,905,896.

i. Independent claim 30 by specifically including a fuel selector for use with a dual fuel generator, the fuel selector having a valve assembly fluidly couplable to each of a first fuel source and a second fuel source and operable to selectively control a first fuel flow and a second fuel flow from the first fuel source and the second fuel source, respectively, to an engine of the dual fuel generator, the valve assembly having two fuel inputs including a first fuel input couplable to the first fuel source and a second fuel input couplable to the second fuel source and two fuel outputs configured to selectively supply fuel to the engine from the first fuel source or the second fuel source; and a selector switch positioned on the valve assembly to allow a user to manually select the first fuel flow or the second fuel flow, as called for in claim 30 of U.S. Patent No. 11,905,896.

j. Dependent claim 31 by specifically including all the aforementioned elements of claim 30 and, in addition, the two fuel outputs are configured to selectively supply fuel to the engine from only one of the first and second fuel sources responsive to selection of the first fuel flow or the second fuel

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flow via the selector switch and a corresponding operation of the valve assembly, as called for in claim 31 of U.S. Patent No. 11,905,896.

k. Dependent claim 32 by specifically including all the aforementioned elements of claim 30 and, in addition, the valve assembly has a first fuel valve having open and closed positions to selectively control the first fuel flow to the engine and a second fuel valve having open and closed positions to selectively control the second fuel flow to the engine, as called for in claim 32 of U.S. Patent No. 11,905,896.

l. Dependent claim 36 by specifically including the all the aforementioned elements of claim 30 and, in addition, a carburetor solenoid switch configured to activate an associated carburetor solenoid when actuate, as called for in claim 36 of U.S. Patent No. 11,905,896.

m. Dependent claim 37 by specifically including all the aforementioned elements of claim 36 and, in addition, when the selector switch is in a first position, the selector switch actuates the carburetor solenoid switch so as to activate the carburetor solenoid and prohibit the second fuel flow to the engine, as called for in claim 37 of U.S. Patent No. 11,905,896.

Therefore, each of the foregoing Firman generator models listed in Paragraph 163(a)-(e) infringes at least claims 21-28, 30-32, and 36, and 37 of U.S. Patent No. 11,905,896.

165. Upon information and belief, Firman has been and is now making, using, selling, or offering for sale within the United States, or importing into the United States, the following additional generator models:

a. Model H03654, a dual fuel portable generator;

b. Model H05754, a dual fuel portable generator;

c. Model H07554, a dual fuel portable generator;

d. Model H08052, a dual fuel portable generator; and

e. Model T07571F, a refurbished tri fuel portable generator.

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166. Upon review of images, owner's manuals, and electrical schematics of the foregoing Firman generator models and comparisons of the images, owner's manuals, and electrical schematics of the foregoing Firman generator models to those of the Firman generator models listed in Paragraphs 161 and 163, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 30-32, 36, and 37 of U.S. Patent No. 11,905,896. Each of the foregoing Firman generator models infringes:

a. Independent claim 30 by specifically including a fuel selector for use with a dual fuel generator, the fuel selector having a valve assembly fluidly couplable to each of a first fuel source and a second fuel source and operable to selectively control a first fuel flow and a second fuel flow from the first fuel source and the second fuel source, respectively, to an engine of the dual fuel generator, the valve assembly having two fuel inputs including a first fuel input couplable to the first fuel source and a second fuel input couplable to the second fuel source and two fuel outputs configured to selectively supply fuel to the engine from the first fuel source or the second fuel source; and a selector switch positioned on the valve assembly to allow a user to manually select the first fuel flow or the second fuel flow, as called for in claim 30 of U.S. Patent No. 11,905,896.

b. Dependent claim 31 by specifically including all the aforementioned elements of claim 30 and, in addition, the two fuel outputs are configured to selectively supply fuel to the engine from only one of the first and second fuel sources responsive to selection of the first fuel flow or the second fuel flow via the selector switch and a corresponding operation of the valve assembly, as called for in claim 31 of U.S. Patent No. 11,905,896.

c. Dependent claim 32 by specifically including all the aforementioned elements of claim 30 and, in addition, the valve assembly has a first fuel valve having open and closed positions to selectively control the first fuel

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flow to the engine and a second fuel valve having open and closed positions to selectively control the second fuel flow to the engine, as called for in claim 32 of U.S. Patent No. 11,905,896.

d. Dependent claim 36 by specifically including the all the aforementioned elements of claim 30 and, in addition, a carburetor solenoid switch configured to activate an associated carburetor solenoid when actuate, as called for in claim 36 of U.S. Patent No. 11,905,896.

e. Dependent claim 37 by specifically including all the aforementioned elements of claim 36 and, in addition, when the selector switch is in a first position, the selector switch actuates the carburetor solenoid switch so as to activate the carburetor solenoid and prohibit the second fuel flow to the engine, as called for in claim 37 of U.S. Patent No. 11,905,896.

Therefore, each of the foregoing Firman generator models listed in Paragraph 165(a)-(e) infringes at least claims 30-32, 36, and 37 of U.S. Patent No. 11,905,896.

167. Upon information and belief, Firman has been and is now making, using, selling, or offering for sale within the United States, or importing into the United States, the following additional generator models:

a. Model WH02942F, a refurbished dual fuel inverter portable generator;

b. Model WH03242F, a refurbished dual fuel inverter portable generator; and

c. Model WH03342, a dual fuel inverter portable generator.

168. Upon review of images, owner's manuals, and electrical schematics of the foregoing Firman generator models and comparisons of the images, owner's manuals, and electrical schematics of the foregoing Firman generator models to those of the Firman generator models listed in Paragraphs 161 and 163, it was determined that each of the foregoing Firman generator models includes all of the elements of at least claims 21-28, 30, 32, 35, and 37 of U.S. Patent No. 11,905,896.

a. Independent claim 21 by specifically including fuel selector of a dual fuel generator having a valve assembly fluidly couplable to each of a first fuel

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source and a second fuel source and operable to selectively control a first fuel flow and a second fuel flow from the first fuel source and the second fuel source, respectively, to an engine of the dual fuel generator; a selector switch having a first fuel mode and a second fuel mode; a fuel solenoid having open and closed positions; and a solenoid switch having open and closed positions; wherein, when the selector switch is in the first fuel mode, the solenoid switch and the fuel solenoid are in the closed positions; wherein, when the selector switch is in the second fuel mode, the solenoid switch and the fuel solenoid are in the open positions, and wherein positioning of the selector switch in the first fuel mode and the second fuel mode enables a selection of the first fuel flow or the second fuel flow, as called for in claim 21 of U.S. Patent No. 11,905,896.

b. Dependent claim 22 by specifically including all the aforementioned elements of claim 21 and, in addition, positioning the selector switch in the first fuel mode enables the selection of the first fuel flow and positioning the selector switch in the second fuel mode enables the selection of the second fuel flow, as called for in claim 22 of U.S. Patent No. 11,905,896.

c. Dependent claim 23 by specifically including all the aforementioned elements of claim 21 and, in addition, the selector switch triggers the solenoid switch when changed from the second fuel mode to the first fuel mode so as to cause the solenoid switch and the fuel solenoid to operate in the closed positions, as called for in claim 23 of U.S. Patent No. 11,905,896.

d. Dependent claim 24 by specifically including all the aforementioned elements of claim 21 and, in addition, the fuel solenoid is a carburetor shutoff solenoid, as called for in claim 24 of U.S. Patent No. 11,905,896.

e. Dependent claim 25 by specifically including all the aforementioned elements of claim 21 and, in addition, the selector switch is positioned

adjacent to the valve assembly, as called for in claim 25 of U.S. Patent No. 11,905,896.

f. Dependent claim 26 by specifically including all the aforementioned elements of claim 21 and, in addition, the valve assembly has two fuel inputs including a first fuel input couplable to the first fuel source and a second fuel input couplable to the second fuel source and two fuel outputs for selectively supplying fuel to the engine from the first fuel source or the second fuel source, as called for in claim 26 of U.S. Patent No. 11,905,896.

g. Dependent claim 27 by specifically including all the aforementioned elements of claim 26 and, in addition, the two fuel outputs selectively supply fuel to the engine from only one of the first and second fuel sources responsive to selection of the first fuel flow or the second fuel flow via the selector switch and a corresponding operation of the valve assembly, as called for in claim 27 of U.S. Patent No. 11,905,896.

h. Dependent claim 28 by specifically including all the aforementioned elements of claim 26 and, in addition, the valve assembly has a first fuel valve having open and closed positions to selectively control the first fuel flow to the engine and a second fuel valve having open and closed positions to selectively control the second fuel flow to the engine, as called for in claim 28 of U.S. Patent No. 11,905,896.

i. Independent claim 30 by specifically including a fuel selector for use with a dual fuel generator, the fuel selector having a valve assembly fluidly couplable to each of a first fuel source and a second fuel source and operable to selectively control a first fuel flow and a second fuel flow from the first fuel source and the second fuel source, respectively, to an engine of the dual fuel generator, the valve assembly having two fuel inputs including a first fuel input couplable to the first fuel source and a second fuel input couplable to the second fuel source and two fuel outputs configured to selectively

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supply fuel to the engine from the first fuel source or the second fuel source; and a selector switch positioned on the valve assembly to allow a user to manually select the first fuel flow or the second fuel flow, as called for in claim 30 of U.S. Patent No. 11,905,896.

j. Dependent claim 31 by specifically including all the aforementioned elements of claim 30 and, in addition, the two fuel outputs are configured to selectively supply fuel to the engine from only one of the first and second fuel sources responsive to selection of the first fuel flow or the second fuel flow via the selector switch and a corresponding operation of the valve assembly, as called for in claim 31 of U.S. Patent No. 11,905,896.

k. Dependent claim 32 by specifically including all the aforementioned elements of claim 30 and, in addition, the valve assembly has a first fuel valve having open and closed positions to selectively control the first fuel flow to the engine and a second fuel valve having open and closed positions to selectively control the second fuel flow to the engine, as called for in claim 32 of U.S. Patent No. 11,905,896.

l. Dependent claim 36 by specifically including the all the aforementioned elements of claim 30 and, in addition, a carburetor solenoid switch configured to activate an associated carburetor solenoid when actuate, as called for in claim 36 of U.S. Patent No. 11,905,896.

m. Dependent claim 37 by specifically including all the aforementioned elements of claim 36 and, in addition, when the selector switch is in a first position, the selector switch actuates the carburetor solenoid switch so as to activate the carburetor solenoid and prohibit the second fuel flow to the engine, as called for in claim 37 of U.S. Patent No. 11,905,896.

Therefore, each of the foregoing Firman generator models listed in Paragraph 167(a)-(c) infringes at least claims 21-28, 30-32, and 36, and 37 of U.S. Patent No. 11,905,896.

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169. Champion has no adequate remedy at law against Firman's acts of infringement and will suffer irreparable harm unless Firman is preliminarily and permanently enjoined from its infringement of U.S. Patent No. 11,905,896.

170. Upon information and belief, Firman's infringement has been willful, deliberate, and with knowledge of Champion's rights under U.S. Patent No. 11,905,896.

171. Firman, by way of its infringing activity, has caused and continues to cause Champion to suffer damages in an amount to be determined at trial.

PRAYER FOR RELIEF

Wherefore, Champion prays for judgment against Firman, granting Champion the following relief:

A. That this Court adjudge and decree that U.S. Patent No. 10,221,780 is valid and enforceable against Firman and that Firman has infringed and continues to infringe the patent;

B. That this Court adjudge and decree that U.S. Patent No. 10,393,034 is valid and enforceable against Firman and that Firman has infringed and continues to infringe the patent;

C. That this Court adjudge and decree that U.S. Patent No. 10,598,101 is valid and enforceable against Firman and that Firman has infringed and continues to infringe the patent;

D. That this Court adjudge and decree that U.S. Patent No. 10,697,398 is valid and enforceable against Firman and that Firman has infringed and continues to infringe the patent;

E. That this Court adjudge and decree that U.S. Patent No. 11,143,120 is valid and enforceable against Firman and that Firman has infringed and continues to infringe the patent;

F. That this Court adjudge and decree that U.S. Patent No. 11,143,145 is valid and enforceable against Firman and that Firman has infringed and continues to infringe the patent;

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G. That this Court adjudge and decree that U.S. Patent No. 11,306,667 is valid and enforceable against Firman and that Firman has infringed and continues to infringe the patent;

H. That this Court adjudge and decree that U.S. Patent No. 11,492,985 is valid and enforceable against Firman and that Firman has infringed and continues to infringe the patent;

I. That this Court adjudge and decree that U.S. Patent No. 11,530,654 is valid and enforceable against Firman and that Firman has infringed and continues to infringe the patent;

J. That this Court adjudge and decree that U.S. Patent No. 11,761,390 is valid and enforceable against Firman and that Firman has infringed and continues to infringe the patent;

K. That this Court adjudge and decree that U.S. Patent No. 11,840,970 is valid and enforceable against Firman and that Firman has infringed and continues to infringe the patent;

L. That this Court adjudge and decree that U.S. Patent No. 11,905,895 is valid and enforceable against Firman and that Firman has infringed and continues to infringe the patent;

M. That this Court adjudge and decree that U.S. Patent No. 11,905,896 is valid and enforceable against Firman and that Firman has infringed and continues to infringe the patent;

N. That this Court grant injunctions enjoining the aforesaid acts of infringement by Firman, its officers, agents, servants, employees, contractors, subsidiaries, and attorneys, and those acting in concert with them, including related individuals and entities, customers, representatives, original equipment manufacturers ("OEMs"), dealers, and distributors;

O. That this Court enter an award to Champion of such damages as it shall prove at trial against Firman that are adequate to compensate Champion for said infringement as permitted under the Patent Act;

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P. That this Court order an award to Champion of up to three times the amount of compensatory damages because of Firman's willful infringement and any enhanced damages as provided by 35 U.S.C. § 284;

Q. That this Court render a finding that this case is "exceptional" and award Champion its costs and reasonable attorneys' fees, as provided by 35 U.S.C. § 285;

R. That this Court award Champion any profits that Champion lost due to Firman's infringement of U.S. Patent No. 10,221,780;

S. That this Court award Champion any profits that Champion lost due to Firman's infringement of U.S. Patent No. 10,393,034;

T. That this Court award Champion any profits that Champion lost due to Firman's infringement of U.S. Patent No. 10,598,101;

U. That this Court award Champion any profits that Champion lost due to Firman's infringement of U.S. Patent No. 10,697,398;

V. That this Court award Champion any profits that Champion lost due to Firman's infringement of U.S. Patent No. 11,143,120;

W. That this Court award Champion any profits that Champion lost due to Firman's infringement of U.S. Patent No. 11,143,145;

X. That this Court award Champion any profits that Champion lost due to Firman's infringement of U.S. Patent No. 11,306,667;

Y. That this Court award Champion any profits that Champion lost due to Firman's infringement of U.S. Patent No. 11,492,985;

Z. That this Court award Champion any profits that Champion lost due to Firman's infringement of U.S. Patent No. 11,530,654;

AA. That this Court award Champion any profits that Champion lost due to Firman's infringement of U.S. Patent No. 11,761,390;

BB. That this Court award Champion any profits that Champion lost due to Firman's infringement of U.S. Patent No. 11,840,970;

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CC. That this Court award Champion any profits that Champion lost due to Firman's infringement of U.S. Patent No. 11,905,895;

DD. That this Court award Champion any profits that Champion lost due to Firman's infringement of U.S. Patent No. 11,905,896;

EE. That this Court award Champion pre-judgment and post-judgment interests on damages to the maximum extent allowed under the law; and

FF. That this Court grant to Champion such other, further, and different relief as may be just and proper.

JURY TRIAL DEMAND

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Champion respectfully demands a trial by jury of any and all issues triable of right before a jury.

DATED this 29th day of March, 2024.

SNELL & WILMER L.L.P.

By:*/s/Zachary G. Schroeder*

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