

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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EIK ENGINEERING SDN. BHD.,  
Petitioner,

v.

WILCO MARSH BUGGIES & DRAGLINES, INC.,  
Patent Owner.

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IPR2020-00344  
Patent 6,918,801 B2

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Before LYNNE H. BROWNE, BARRY L. GROSSMAN, and  
SCOTT C. MOORE, *Administrative Patent Judges*.

GROSSMAN, *Administrative Patent Judge*.

DECISION  
Denying Institution of *Inter Partes* Review  
35 U.S.C. § 314, 37 C.F.R. § 42.4

## I. INTRODUCTION

EIK Engineering Sdn. Bhd. (“Petitioner”) filed a petition, Paper 1 (“Petition” or “Pet.”), to institute an *inter partes* review of claims 1–18 (collectively, the “challenged claims”) of U.S. Patent 6,918,801 B2 (the “’801 patent”). Wilco Marsh Buggies & Draglines, Inc. (“Patent Owner”) filed a Preliminary Response. Paper 4 (“Prelim. Resp.”).

Under 35 U.S.C. § 314, an *inter partes* review may not be instituted “unless . . . there is a reasonable likelihood that the petitioner would prevail with respect to at least 1 of the claims challenged in the petition.” 35 U.S.C. § 314(a). The Board determines whether to institute a trial on behalf of the Director. 37 C.F.R. § 42.4(a). If an *inter partes* review is instituted, a final written decision under 35 U.S.C. § 318(a) must decide the patentability of all claims challenged in the petition. *SAS Inst., Inc. v. Iancu*, 138 S. Ct. 1348, 1353 (2018).

For the reasons set forth below, we determine that the Petition fails to identify with particularity the evidence that supports the grounds for each challenge to each claim. *See* 35 U.S.C. § 312(a)(3) (“A petition filed under section 311 may be considered only if . . . the petition identifies, in writing and with particularity, each claim challenged, the grounds on which the challenge to each claim is based, and the evidence that supports the grounds for the challenge to each claim.”). Accordingly, we do not institute an *inter partes* review. *See PGS Geophysical AS v. Iancu*, 891 F.3d 1354, 1360 (Fed. Cir. 2018) (stating that a decision to institute is “a simple yes-or-no institution choice respecting a petition, embracing all challenges included in the petition”).

*A. Real Parties-in-Interest*

Petitioner identifies itself, EIK International Corp., and Houston Heavy Machinery, LLC as real parties-in-interest. Pet. 2.

Patent Owner identifies itself as the real party-in-interest. Prelim. Resp. 9.

*B. Related Proceedings*

Petitioner and Patent Owner identify *Wilco Marsh Buggies & Draglines, Inc. v. EIK Engineering Sdn. Bhd.*; Civil Action No. 6:19-cv-00565-ADA, pending in the Western District of Texas, Waco Division (filed October 3, 2019) as a related proceeding. Pet. 2; Prelim. Resp. 9.

II. BACKGROUND

*A. The '801 Patent*

The '801 patent discloses amphibious excavating equipment. Ex.1001, 1:14–16. More particularly, the '801 patent discloses a tracked, self-propelled platform from which equipment can operate on land or floating in a body of water. *Id.* at 1:16–18.

Petitioner provides the following annotated Figure 1 from the '801 patent. Pet. 17.

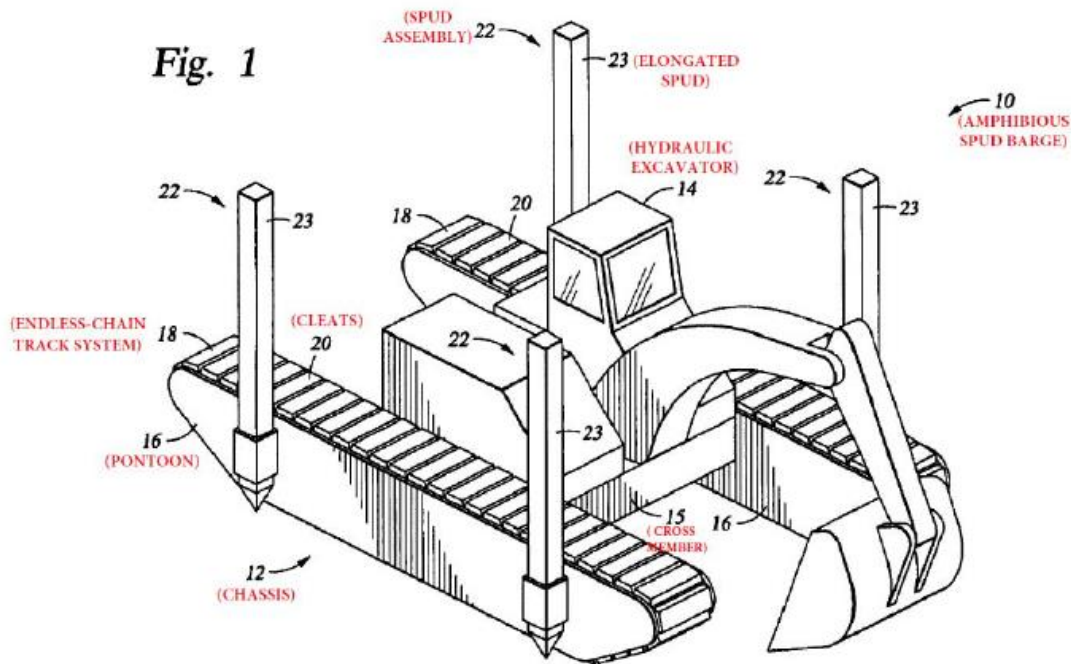


Fig. 1 is an isometric vehicle (Ex. 1001, 3:34)  
annotated by Petitioner. Pet. 17.

As shown in Figure 1, amphibious spud barge 10 includes chassis 12 and hydraulic excavator 14. Ex. 1001, 4:6–7. Chassis 12 includes two pontoons 16, which are connected by chassis cross member 15 and equipped with endless-chain track systems 18 having a plurality of cleats 20. *Id.* at 4:9–12. Track systems 18 are driven so as to provide forward motion to barge 10 by the moving cleats 20 pushing on the land or in the water. *Id.* at 4:12–14. pontoons 16 preferably are constructed so as to provide adequate buoyancy to enable barge 10 to float in water. *Id.* at 4:14–16. Thus, spud barge 10 can traverse dry land, soft soils, and water using the propulsion provided by the cleats 20 on track systems 18. *Id.* at 4:16–18.

Pontoons 16 are also equipped with spud assemblies 22 located on the sides of the pontoons. *Id.* at 4:19–20. Spud assemblies 22 include elongated spuds 23 that can be extended below the bottom of pontoons 16 and reach

from the barge to the bottom of the body of water in which the barge is floating. *Id.* at 4:20–25. Spuds 23 are of sufficient strength to provide lateral support to floating barge 10 to keep the barge in one position by resisting the forces both from water motion (e.g. current, tides, waves) and from the operations of the equipment on barge 10. *Id.* at 4:26–29.

### *B. Representative Claim*

Among the challenged claims, claims 1, 9, and 12 are independent claims. Claim 1, reproduced below, is representative.

1. A vehicle comprising:
  - a chassis;
  - at least two pontoons supported by said chassis, wherein said pontoons provide sufficient buoyancy such that the vehicle can float on water;
  - a track system disposed on said pontoons and adapted to provide propulsion to the vehicle when moving on land or in water;
  - a plurality of spuds connected to said chassis, wherein said spuds have a first position wherein said spuds extend below the bottom of said pontoons and a second position wherein said spuds do not extend below the bottom of said pontoons.

Ex. 1001, 5:60–6:5.

Claim 9 is a method of performing excavating operations using the apparatus disclosed in the '801 patent. Claim 12 is similar to claim 1 but it also specifically recites “equipment” mounted to the chassis.

### *C. Asserted Grounds of Unpatentability*

Petitioner challenges claims 1–18 under 35 U.S.C. § 103<sup>1</sup> on twenty separate and distinct grounds. *See, e.g.*, Pet. 6–7. Petitioner divides the

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<sup>1</sup> The Leahy-Smith America Invents Act (“AIA”), Pub. L. No. 112-29, 125 Stat. 284, 296–07 (2011), took effect on September 16, 2011. The changes

twenty grounds into five groups: “Base Grounds” (Grounds 1–4), “Winch Grounds” (Grounds 5–8), “Gravity Grounds” (Grounds 9–12), “Cylinder Grounds” (Grounds 13–16), and “Method Grounds” (Grounds 17–20). *See, e.g.*, Pet. 5–7. Petitioner identifies the twenty grounds as follows:

Ground 1: Claims 1-5 and 9-15 are obvious in view of Harada and Soehrlen. *Id.* at 5;

Grounds 2–4: Claims 1–5 and 9–15 are obvious in view of Prestenbach and any of Soehrlen (Ground 2), Fujita (Ground 3) or Zong (Ground 4). *Id.*;

Grounds 5–8: Claims 6, 16 and 7, 17 are obvious in view of any of Grounds 1, (Ground 5), 2 (Ground 6), 3 (Ground 7) or 4 (Ground 8) in further view of Soehrlen<sup>2</sup>. *Id.* at 6;

Grounds 9–12: Claims 7, 17 are obvious in view of any of Grounds 5 (Ground 9), 6 (Ground 10), 7 (Ground 11) or 8 (Ground 12), further in view of Kissick. *Id.* at 6–7;

Grounds 13–16: Claims 8 and 18 are obvious in view of any of Grounds 1 (Ground 13), 2 (Ground 14), 3 (Ground 15) or 4 (Ground 16), in further view of Sturdivant. *Id.* at 7; and

Ground[s] 17–20: Claims 9–11 are obvious in view any of Grounds 1 (Ground 17), 2 (Ground 18), 3 (Ground 19),

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to 35 U.S.C. §§ 102 and 103 in the AIA do not apply to any patent application filed before March 16, 2013. Because the application for the patent at issue in this proceeding has an effective filing date (June 3, 2003) before either of these dates, we refer to the pre-AIA version of the statute.

<sup>2</sup>Soehrlen is listed as an additional reference, but it is already included as a reference in each of Grounds 1 and 2. As we explain below, the redundant recitation of Soehrlen is not the basis for our determination that the petition fails to identify, with particularity, the grounds on which the challenge to each claim is based, and the evidence that supports the grounds for the challenge to each claim, as required by 35 U.S.C. § 312(a)(3).

4 (Ground 20) further in view of the general knowledge of a POSITA. *Id.*

We summarize these grounds in the chart below, including Petitioner's redundant statement of references relied on for some grounds. The chart below includes the grounds presented in the Petition. This chart is different from the chart presented in the Declaration testimony of Glen Stevick, Ph.D. *See* Ex. 1003 ¶ 78. For example, Dr. Stevick's chart eliminates the Soehnlen redundancy in Grounds 1 and 2. Consistent with the statute, however, our focus is on what is asserted in the Petition. *See* 35 U.S.C. § 312(a)(3).

<b>Claims</b>	<b>35 U.S.C. §</b>	<b>References</b>
1–5, 9–15 (Ground 1)	§ 103	Harada (Ex. 1004), Soehnlén (Ex. 1008) (Pet. 5, 27)
1–5, 9–15 (Ground 2)	§ 103	Prestenbach (Ex. 1006), Soehnlén (Pet. 5, 46)
1–5, 9–15 (Ground 3)	§ 103	Prestenbach, Fujita (Ex. 1007) (Pet. 5, 46)
1–5, 9–15 (Ground 4)	§ 103	Prestenbach, Zong (Ex. 1009) (Pet. 5, 46)
6, 7, 16, 17 (Ground 5)	§ 103	Harada, Soehnlén, Soehnlén (“Ground 1 . . . further in view of Soehnlén”) (Pet. 6, 63)
6, 7, 16, 17 (Ground 6)	§ 103	Prestenbach, Soehnlén, Soehnlén (“Ground 2 . . . further in view of Soehnlén”) (Pet. 6, 63)
6, 7, 16, 17 (Ground 7)	§ 103	Prestenbach, Fujita, Soehnlén (“Ground 3 . . . further in view of Soehnlén”) (Pet. 6, 63)
6, 7, 16, 17 (Ground 8)	§ 103	Prestenbach, Zong, Soehnlén (“Ground 4 . . . further in view of Soehnlén”) (Pet. 6, 63)
7, 17 (Ground 9)		Harada, Soehnlén, Soehnlén, Kissick (“Ground 5 . . . further in view of Kissick”) (Pet. 6–7, 69)
7, 17 (Ground 10)		Prestenbach, Soehnlén, Soehnlén, Kissick (“Ground 6 . . . further in view of Kissick”) (Pet. 6–7, 69)
7, 17 (Ground 11)		Prestenbach, Fujita, Soehnlén, Kissick (“Ground 7 . . . further in view of Kissick”) (Pet. 6–7, 69)
7, 17 (Ground 12)		Prestenbach, Zong, Soehnlén, Kissick (“Ground 8 . . . further in view of Kissick”) (Pet. 6–7, 69)
8, 18 (Ground 13)		Harada, Soehnlén, Sturdivant (“Ground 1 . . . further in view of Sturdivant”) (Pet. 7, 72)



Claims	35 U.S.C. §	References
8, 18 (Ground 14)		Prestenbach, Soehnlén, Sturdivant (“Ground 2 . . . further in view of Soehnlén”) (Pet. 7, 72)
8, 18 (Ground 15)		Prestenbach, Fujita, Sturdivant (“Ground 3 . . . further in view of Sturdivant”) (Pet. 7, 72)
8, 18 (Ground 16)		Prestenbach, Zong, Sturdivant (“Ground 4 . . . further in view of Sturdivant”) (Pet. 7, 72)
9–11 (Ground 17)		Harada, Soehnlén (“Ground 1 . . . further in view of the general knowledge of a POSITA <sup>3</sup> ”) (Pet. 7, 76)
9–11 (Ground 18)		Prestenbach, Soehnlén (“Ground 2 . . . further in view of the general knowledge of a POSITA”) (Pet. 7, 76)
9–11 (Ground 19)		Prestenbach, Fujita (“Ground 3 . . . further in view of the general knowledge of a POSITA”) (Pet. 7, 76)
9–11 (Ground 20)		Prestenbach, Zong (“Ground 4 . . . further in view of the general knowledge of a POSITA”) (Pet. 7, 76)

Petitioner also relies on the Declaration testimony of Glen Stevick, Ph.D. (Ex. 1003).

We note that except for Dr. Stevick’s correction of the redundant listing of Soehnlén in Grounds 5, 6, 9, and 10, Dr. Stevick’s identification of the grounds and references is identical to our listing in the chart above.

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<sup>3</sup> The general knowledge of a person of ordinary skill is part of the statutory analysis under § 103(a) (“A patent may not be obtained . . . if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains.” 35 U.S.C. § 103(a).

### III. ANALYSIS

#### IV. ASSERTED UNPATENTABILITY

##### *A. Legal Principles*

Section 103(a) forbids issuance of a patent when “the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains.” *KSR*, 550 U.S. at 406. The question of obviousness is resolved on the basis of underlying factual determinations, including: (1) the scope and content of the prior art; (2) any differences between the claimed subject matter and the prior art; (3) the level of ordinary skill in the art; and (4) when available, evidence such as commercial success, long felt but unsolved needs, and failure of others. *Graham v. John Deere Co.*, 383 U.S. 1, 17–18 (1966); *see KSR*, 550 U.S. at 407 (“While the sequence of these questions might be reordered in any particular case, the [Graham] factors continue to define the inquiry that controls.”). The Court in *Graham* explained that these factual inquiries promote “uniformity and definiteness,” for “[w]hat is obvious is not a question upon which there is likely to be uniformity of thought in every given factual context.” 383 U.S. at 18.

The Supreme Court made clear that we apply “an expansive and flexible approach” to the question of obviousness. *KSR*, 550 U.S. at 415. In order to determine whether a patent claiming a combination of prior art elements would have been obvious, however, it is not enough to show merely that the prior art includes separate references covering each separate limitation in a challenged claim. *Unigene Labs., Inc. v. Apotex, Inc.*, 655

F.3d 1352, 1360 (Fed. Cir. 2011). Rather, obviousness additionally requires that a person of ordinary skill at the time of the invention “would have selected and combined those prior art elements in the normal course of research and development to yield the claimed invention.” *Id.*; *see also Orexo AB v. Actavis Elizabeth LLC*, 903 F.3d 1265, 1273 (Fed. Cir. 2018) (“The question is not whether the various references separately taught components of the ’330 Patent formulation, but whether the prior art suggested the selection and combination achieved by the ’330 inventors.”).

In determining whether there would have been reasons with a rational underpinning to combine prior art references to arrive at the claimed invention, it is insufficient to simply conclude the combination would have been obvious without identifying any reason *why* a person of skill in the art would have made the combination. *Metalcraft of Mayville, Inc. v. The Toro Co.*, 848 F.3d 1358, 1366 (Fed. Cir. 2017).

Moreover, in determining the differences between the prior art and the claims, the question under 35 U.S.C. § 103 is not whether the differences themselves would have been obvious, but whether the claimed invention as a whole would have been obvious. *Litton Indus. Prods., Inc. v. Solid State Sys. Corp.*, 755 F.2d 158, 164 (Fed. Cir. 1985) (“It is elementary that the claimed invention must be considered as a whole in deciding the question of obviousness.” (citation omitted)); *see also Stratoflex, Inc. v. Aeroquip Corp.*, 713 F.2d 1530, 1537 (Fed. Cir. 1983) (“[T]he question under 35 U.S.C. § 103 is not whether the differences themselves would have been obvious. Consideration of differences, like each of the findings set forth in *Graham*, is but an aid in reaching the ultimate determination of whether the claimed invention as a whole would have been obvious.” (citation omitted)).

*B. Grounds 5–8, Claims 6, 7, 16, 17*

Petitioner asserts that claims 6, 7, 16, and 17 would have been obvious based on various combinations of Harada, Soehnlén, Prestenbach, Fujita, Zong. Pet. 63–69. We consider the redundant listing of Soehnlén in Grounds 5 and 6 as an obvious error, which we ignore. In Grounds 7 and 8, however, Petitioner relies on both Soehnlén *and* Fujita (Ground 7) and Soehnlén *and* Zong (Ground 8) as being combined with Prestenbach. Petitioner is relying on a combination of three references in each of Grounds 7 and 8. Petitioner’s expert, Dr. Stevik agrees. *See* Ex. 1003 ¶ 78 (identifying Ground 7 as “Prestenbach *and* Fujita (Ground 3) *and* Soehnlén” and identifying Ground 8 as “Prestenbach *and* Zong (Ground 4) *and* Soehnlén”) (emphases added). There is no analysis or discussion, however, as to how or why Soehnlén *and* Zong would *both* be combined with Prestenbach in Grounds 7 and 8 of the Petition. Thus, for Grounds 7 and 8, Petitioner fails to identify, with particularity, how and why the evidence supports a ground of unpatentability based on three references for the challenge to each claim in Grounds 7 and 8, as required by 35 U.S.C. § 312(a)(3).

Petitioner states that the reason Petitioner asserts 20 grounds is because it “relies on of Soehnlén, Zong *or* Fujita to supply the missing spud features of Prestenbach (Grounds 2-4).” Pet. 79 (emphasis added). Petitioner also states “the arguments for combining those references with Prestenbach are essentially the same, and therefore do not require multiple, separate analyses by the Board.” *Id.* The confusion here, however, is that Grounds 7 and 8 clearly rely on a combination of three references – Prestenbach, Fujita, *and* Soehnlén – whereas elsewhere in the Petition (*id.*)

Petitioner asserts that Soehnlén, Zong, and Fujita are each alternatives (“Soehnlén, Zong *or* Fujita”). For Grounds 7 and 8, however, Petitioner fails to identify, with particularity, how and why the evidence supports a ground of unpatentability based on three references for the challenge to each claim in Grounds 7 and 8, as required by 35 U.S.C. § 312(a)(3).

*C. Grounds 9–12, Claims 7, 17*

Petitioner asserts that claims 7 and 17 would have been obvious based on various combinations of Harada, Soehnlén, Prestenbach, Fujita, Zong, and Kissick. Pet. 69–71. We consider the redundant listing of Soehnlén in Grounds 9 and 10 as an obvious error, which we ignore. In Grounds 11 and 12, however, Petitioner relies on four references – Prestenbach, Fujita, Soehnlén, and Kissick (Ground 11) and on Prestenbach, Zong, Soehnlén, and Kissick (Ground 12). Again, Petitioner’s expert, Dr. Stevik agrees. *See* Ex. 1003 ¶ 78 (identifying Ground 11 as “Prestenbach, Fujita, Soehnlén (Ground 7) *and* Kissick” and identifying Ground 12 as “Prestenbach, Zong, Soehnlén (Ground 8) *and* Kissick) (emphases added). There is no analysis or discussion, however, as to how or why Soehnlén *and* Zong would *both* be combined with Prestenbach and Kissick in Grounds 11 and 12 of the Petition. Thus, for Grounds 11 and 12, Petitioner fails to identify, with particularity, how and why the evidence supports a ground of unpatentability based on four references for the challenge to each claim in Grounds 11 and 12, as required by 35 U.S.C. § 312(a)(3).

*D. Lack of Identification With Particularity*

A petition “may be considered only if . . . the petition identifies, in writing and with particularity, each claim challenged, the grounds on which

the challenge to each claim is based, and the evidence that supports the grounds for the challenge to each claim.” 35 U.S.C. § 312(a)(3); *see also* 37 C.F.R. §42.104(b)(4) (requiring the petition to “specify where each element of the claim is found in the prior art patents or printed publications relied upon”); 37 C.F.R. §42.22(a)(2) (requiring “a detailed explanation of the significance of the evidence including material facts, and the governing law, rules, and precedent”).

The Supreme Court made clear that we apply “an expansive and flexible approach” to the question of obviousness. *KSR*, 550 U.S. at 415. But even a flexible approach has limits. Petitioner has exceeded those limits by not stating with particularity the specific basis of the asserted grounds of patentability when relying on two or more of Soehrlen, Fujita, and Zong combined with Harada or Prestenbach in order to meet the limitation of the claims at issue in Grounds 7, 8, 11, and 12. The Petition does not explain with particularity, for example, why these Grounds rely on Fujita or Zong when also relying on Soehrlen.

The Petition fails to identify with particularity what disclosure is relied on from each of the references in Grounds 7, 8, 11, and 12, how it would be combined with the other disclosures, and why the proposed combination would have been obvious to a person of ordinary skill in the relevant technology. Without any explanation as to what, how, and why the references would have been combined in Grounds 7, 8, 11, and 12, we, and the Patent Owner, are left to speculate as to the specific details of asserted unpatentability based on combining the references to arrive at the claimed invention. *See Metalcraft of Mayville*, 848 F.3d at 1367.

Petitioner has not satisfied the requirement to state, with particularity, the grounds on which the challenge to each claim is based, and the evidence that supports the grounds for the challenge to each claim, as required by 35 U.S.C. § 312(a)(3). The Supreme Court, in *SAS Institute, Inc. v. Iancu*, 138 S. Ct. 1348 (2018), held that an *inter partes* review must institute on all challenged claims or no challenged claims. The Patent Office has further taken the position that, if instituting an *inter partes* review, the Board will institute on all challenged claims and all grounds. See U.S. Patent and Trademark Office, Guidance on the Impact of SAS on AIA Trial Proceedings, available at <https://www.uspto.gov/patents-application-process/patent-trial-and-appeal-board/trials/guidance-impact-sas-aia-trial> (Apr. 26, 2018); see also *PGS Geophysical AS v. Iancu*, 891 F.3d 1354, 1360 (Fed. Cir. 2018) (“Equal treatment of claims and grounds for institution purposes has pervasive support in SAS.”). In this proceeding, if trial were instituted, we would need to institute trial on each of the 20 asserted grounds, notwithstanding Petitioner’s failure to comply with Section 312(a)(3) for four of the asserted grounds.

On this record, and based on the particular facts of this proceeding, instituting a trial with respect to all 18 claims and on all 20 grounds would not be an efficient use of the Board’s time and resources; see *Chevron Oronite Co. v. Infineum USA L.P.*, IPR2018-00923, Paper 9 at 10–11 (PTAB Nov. 7, 2018).

Moreover, instituting a trial on all challenged claims and on all grounds also is unfair to Patent Owner. As Justice Alito has observed:

Section 312(a)(3)’s particularity requirement is designed, at least in part, to ensure that a patent owner has sufficient notice of the challenge against which it must defend. Once *inter partes* review

is instituted, the patent owner's response—its opening brief, essentially—is filed as an opposition to the challenger's petition. See § 316(a)(8); 37 CFR § 42.120. Thus, if a petition fails to state its challenge with particularity—or if the Patent Office institutes review on claims or grounds not raised in the petition—the patent owner is forced to shoot into the dark. The potential for unfairness is obvious.

*Cuozzo Speed Techs., LLC v. Lee*, 136 S. Ct. 2131, 2154 (2016) (Alito, J., concurring in part and dissenting in part); see *Repro-Med Systems, Inc. v. EMED Techs., Inc.*, IPR2018-00981, Paper 8 at 34–37 (PTAB Nov. 2, 2018).

*E. Grounds 1–4, 13–16, and 17–20; Claims 1–5, 8–15, 18*

Petitioner asserts that claims 1–5, 9–15 would have been obvious based on various combinations of Harada, Soehnlén, Prestenbach, Fujita, Zong. Pet. 27–63. Petitioner also asserts that claims 8 and 18 would have been obvious based on various combinations of Harada, Soehnlén, Sturdivant, Prestenbach, Fujita, and Zong. Pet. 72–76. Finally, Petitioner asserts that claims 9–11 would have been obvious based on various combinations of Harada, Soehnlén, Prestenbach, Fujita, and Zong. Pet. 76–78. For the reasons described above, we do not address these Grounds on the merits under 35 U.S.C. § 312(a)(3).

## V. CONCLUSION

The Petition fails to identify with particularity what disclosure is relied on for several grounds, how it would be combined with the other disclosures, and why the proposed combination would have been obvious to a person of ordinary skill in the relevant technology. The lack of



IPR2020-00344  
Patent 6,918,801 B2

particularity infects the proceeding sufficiently that we do not institute an *inter partes* review.

## VI. ORDER

In consideration of the foregoing, it is hereby:

ORDERED that, pursuant to 35 U.S.C. § 314, the Petition is denied and no *inter partes* review is instituted.

IPR2020-00344  
Patent 6,918,801 B2

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