

# United States Court of Appeals for the Federal Circuit

2009-1378, -1387, -1434

GENERAL PROTECHT GROUP, INC.,

Appellant,

and

WENZHOU TRIMONE SCIENCE & TECHNOLOGY ELECTRIC CO., LTD.,

Appellant,

and

SHANGHAI ELE MANUFACTURING CORPORATION,

Appellant,

v.

INTERNATIONAL TRADE COMMISSION,

Appellee,

and

PASS & SEYMOUR, INC.,

Intervenor.

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On appeal from the United States International Trade Commission  
in Investigation No. 337-TA-615.

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## **REPLY BRIEF OF APPELLANT WENZHOU TRIMONE SCIENCE & TECHNOLOGY ELECTRIC CO., LTD.**

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February 9, 2010

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## CERTIFICATE OF INTEREST

Counsel for Wenzhou Trimone Science & Technology Electric Co., Ltd.,  
certifies the following:

1. The full name of every party represented by us is:

Wenzhou Trimone Science & Technology Electric Co., Ltd. (aka Zhejiang  
Trimone Electric Science & Technology Co., Ltd.)

2. The name of the real party in interest (if the party named in the  
caption is not the real party in interest) represented by us is:

Wenzhou Trimone Science & Technology Electric Co., Ltd. (aka Zhejiang  
Trimone Electric Science & Technology Co., Ltd.)

3. All parent corporations and any publicly held companies that own 10  
percent or more of the stock of the party represented by us are:

None

4. The names of all law firms and the partners and associates that have  
appeared for the party in the lower tribunal or are expected to appear for the party  
in this Court are:

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February 9, 2010

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## I. SUMMARY OF THE REPLY

The dispute in this appeal centers on the ordinary meaning of the term “load terminals,” as *claimed* in the ’340 patent. One cannot determine the ordinary meaning of the term in a vacuum, and must ascertain “the meaning that the term would have to a person of ordinary skill in the art in question at the time of the invention” within “the technological and temporal context.” *Phillips v. AWH Corp.*, 415 F.3d 1303, 1313 (Fed. Cir. 2005) (en banc) (emphasis added). For example, just as “guinea pigs” are not a type of “pigs,” the fact that the phrase “user load terminals” (i.e., receptacle outlets) contains the words of the shorter phrase “load terminals” does not imply that the ordinary meaning of the term “load terminals” includes “user load terminals.”

Accordingly, as Trimone argued in its opening brief, “the issue is not . . . whether receptacle outlets have load terminals, but rather whether the ‘load terminals,’ as *claimed* in the ’340 patent, include receptacle outlets.” Trimone Br. 18.

The Commission and P&S ignored this contextual requirement. Instead, they argued that by clarifying the issue and emphasizing the *claimed* “load terminals,” Trimone somehow admitted that “the term’s ordinary meaning would include ‘user load terminals’ [i.e., receptacle outlets].” *See, e.g.*, Comm’n Br. 43; P&S Br. 21. As a result, they grossly mischaracterized Trimone’s argument.

Here, the intrinsic evidence clearly supports that the ordinary meaning of the *claimed* “load terminals” cannot include receptacle outlets. Undisputed is the fact that the ’340 patent never refers to receptacle outlets as “load terminals” and *every* drawing that shows both load terminals and receptacle outlets unequivocally labels them as distinct components. *Compare* A439 at 1:27-33 *with* A439 at 2:12-16; *see also* A434; A432; A435-36; A438. Undisputed is also the fact that the ’386 patent, a related patent with two inventors in common, describes receptacle outlets (also referred to therein as “user load terminals” and “receptacle terminals”) as components separate from “load terminals.” A420 at 1:67-2:2; A424 at 10:36-39, 10:52-55; A425 at 11:44-48. Undisputed is yet another fact that the inventors used both the terms “user load terminals” and “load terminals” in the elements of claim 8 of the ’386 patent, thereby ascribing different meanings to these terms. A426-27.

The Commission and P&S primarily relied on extrinsic evidence in the form of witness testimony to support their argument that the *claimed* “load terminals” include receptacle outlets. *See, e.g.,* Comm’n Br. 43; P&S Br. 21. The witness testimony lacked proper “temporal context,” as it did not address the ordinary meaning of the term *at the time of the invention*. *See* A40407 at 891:3-10; A40408 at 892:9-18; A40377 at 777:20-A40378 at 778:3; A40938 at 2978:18-2979:1; *see also Phillips*, 415 F.3d at 1313 (citing *V-Formation, Inc. v. Benetton Group SpA*, 401 F.3d 1307, 1310 (Fed. Cir. 2005)). Even taking the testimony at face value, it

is undeniable that the witnesses never referred to receptacle outlets as “load terminals”; rather, they referred to the receptacle outlets as “user load terminals.”

In fact, a closer examination of the testimony of P&S’s own expert witness, Dr. Harman, reveals that his testimony actually supports Trimone’s position that receptacle outlets are not the *claimed* “load terminals.” Specifically, Dr. Harman testified that “load terminals would be the terminals for any other devices or *outlets* or appliances that would be connected to the [GFCI] device.” A40408 at 892:9-18 (emphasis added). He clearly considered receptacle outlets as well as other devices and appliances as *components distinct* from the load terminals, essentially admitting that receptacle outlets are not the load terminals.

Therefore, as properly construed, the *claimed* “load terminals” do not include the receptacle outlets. It is undisputed that Trimone’s 2006 GFCIs do not have the claimed “four sets of interrupting contacts that are configured to provide electrical continuity between the line terminals and the load terminals” under this claim construction. Consequently, the Commission’s finding that Trimone’s 2006 GFCIs infringe the ’340 patent should be reversed.

## II. ARGUMENT IN REPLY

### A. The Commission’s Erroneous Construction of “Load Terminals” Lacks Proper Technological and Temporal Context.

The dispute in this appeal centers on the ordinary meaning of the term “load terminals,” as *claimed* in the ’340 patent.<sup>1</sup> One cannot look at the ordinary meaning of the term in a vacuum. *Phillips v. AWH Corp.*, 415 F.3d 1303, 1313 (Fed. Cir. 2005) (en banc). Rather, the ordinary meaning of a claim term is “the meaning that the term would have to a person of ordinary skill in the art in question at the time of the invention.” *Id.* (emphasis added). The intrinsic record “usually provides the technological and temporal context to enable the court to ascertain the meaning of the claim to one of ordinary skill in the art at the time of the invention.” *Id.* (citing *V-Formation, Inc. v. Benetton Group SpA*, 401 F.3d 1307, 1310 (Fed. Cir. 2005)) (emphasis added).

Therefore, Trimone argued in its opening brief, “the issue is not, however, whether receptacle outlets have load terminals, but rather whether the ‘load

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<sup>1</sup> The term “load terminals” was not construed explicitly below. The record is not clear why the parties never sought to construe the term “load terminals” by itself. Presumably, the parties believed that the term requires no further construction other than whether the term includes receptacle outlets. Therefore, Trimone believes that as long as the Court determines whether this term includes receptacle outlets, further construction is not needed.

terminals,’ as *claimed* in the ’340 patent, include receptacle outlets,” and also repeatedly emphasized the *claimed* “load terminals.” Trimone Br. 18.

In contrast, the Commission and P&S ignored the legal requirement of “technological and temporal context,” instead arguing that by clarifying the issue and emphasizing the *claimed* “load terminals,” Trimone somehow admitted that “the term’s ordinary meaning would include ‘user load terminals’ [i.e., receptacle outlets].” *See, e.g.*, Comm’n Br. 43; P&S Br. 21. As a result, the Commission and P&S completely eviscerated the legal requirement of “the technological and temporal context” for claim construction and grossly mischaracterized Trimone’s argument.

Contrary to what the Commission and P&S alleged, Trimone need not fathom whether receptacle outlets have load terminals, because the proper inquiry is whether the “load terminals,” as *claimed* in the ’340 patent, include receptacle outlets. *Phillips*, 415 F.3d at 1313. Certainly, Trimone does not concede that the ordinary meaning of the term “load terminals,” as *claimed* in the ’340 patent, include receptacle outlets.

**B. Just as “Guinea Pigs” are not “Pigs,” “User Load Terminals” Are Not the *Claimed* “Load Terminals.”**

The fallacy of the Commission’s and P&S’s arguments lies in their erroneous assumption that the fact that the phrase “user load terminals” contains the shorter phrase “load terminals” automatically leads to the conclusion that the

*claimed* “load terminals” include “user load terminals” (i.e., receptacle outlets).

Without the technological and temporal context, the ordinary meaning of a term cannot be properly construed. *See Phillips*, 415 F.3d at 1313. *One cannot infer the classification of a term solely from the word composition of the term. Guinea pigs are not pigs, seahorses are not horses, prairie oysters are not oysters, and chicken fingers are not fingers, for example.* Similarly, there is no reason here to infer that the “user load terminals” are a type of the *claimed* “load terminals.”

The Commission and P&S made several arguments based on this erroneous assumption, to which Trimone will respond below.

First, the Commission and P&S incorrectly asserted that Trimone argued the term “load terminals” has a special meaning narrower than its ordinary meaning, citing *Univ. of Pittsburgh of Commw. Sys. of Higher Educ. v. Hedrick*, 573 F.3d 1290, 1296-97 (Fed. Cir. 2009), and stating that Trimone must prove there was “an intent to deviate from” the ordinary meaning. P&S Br. 42.

*Univ. of Pittsburgh* is factually distinguishable, however, for at least the reason that the Commission and P&S have not established the ordinary meaning in the first place. Their argument is based entirely on the fallacious reasoning that the overlap in words between “load terminals” and “user load terminals” implies that the latter is a subset of the former. This does not provide any valid basis for establishing the ordinary meaning of “load terminals.” Indeed, the whole point of

Trimone’s appeal is to explain the ordinary meaning of “load terminals” in the context of the ’340 patent based on the intrinsic evidence that *Phillips* deemed crucial. Accordingly, Trimone has never argued that the term “load terminals” has a special meaning narrower than its ordinary meaning, and does not bear the burden of proving any “intent to deviate.”

Moreover, the intrinsic evidence in this case supports the distinction between “load terminals” and “user load terminals” while the intrinsic evidence in *Univ. of Pittsburgh* did not support any such distinction. This Court in *Univ. of Pittsburgh* reasoned that “the specification does not say that the [inventive] cells are a separate species from [the prior art] mesenchymal stem cells,” thus rejecting the argument that the inventive cells were a separate species from the prior art cells *just* because they have different isolation requirements. *Univ. of Pittsburgh*, 573 F.3d at 1297. In contrast, it is undisputed here that the specifications of the ’340 patent and the related ’386 patent never refer to receptacle outlets as “load terminals” and *every* embodiment unequivocally describes load terminals and receptacle outlets as distinct components. *Compare* A439 at 1:27-33 *with* A439 at 2:12-16; *see also* A434; A432; A435-36; A438. Therefore, unlike *Univ. of Pittsburgh*, the intrinsic evidence here clearly establishes that the load terminals are components distinct from the receptacle outlets.

Second, the Commission and P&S conceded that the terms “user load terminals” (i.e., receptacle outlets) and “load terminals” have different meanings, but argued that the term “load terminals” is a broader term that includes the narrower term “user load terminals.” Comm’n Br. 43; P&S Br. 24-25. The Commission did not, and could not, cite any evidence to support this assertion. Comm’n Br. 43. P&S, on the other hand, argued creatively that the use of the word “user” in the phrase “user load terminals” qualifies the phrase “load terminals” and indicates that the term “load terminals” has a meaning that is broader than, and includes, the “user load terminals.” P&S Br. 24-25.

While the addition of a qualifying word to a term may indicate that the qualified term has a narrower and included meaning, as in the case of the relationship of the phrase “*small pig*” to the word “*pig*,” P&S cannot argue as the entire basis for its position that the inventors in the ’340 patent and ’386 patent used the word “user” as this sort of qualifier to the term “load terminals.” Contrary to those assertions, the inventors explicitly defined *the entire phrase* “user load terminals” as constituting receptacle outlets – distinct from the claimed “load terminals.” A420 at 1:67-2:2 (“The load terminals are typically connected to the user load terminals (i.e., the receptacles).” (emphasis added)). Essentially, P&S is asking this Court to assume that one term is broader than another term and also

includes the other term merely because of some overlapping words. Under P&S's reasoning, "*pigs*" would include "*guinea pigs*" and "*seahorses*" would be "*horses*."

Therefore, Trimone urges this Court to look past the linguistic similarity and determine the ordinary meaning of the term "load terminals" in the technological and temporal context of the '340 patent. *Phillips*, 415 F.3d at 1313.

**C. The Intrinsic Evidence Supports Trimone's Construction that the Ordinary Meaning of the Claimed "Load Terminals" Cannot Include Receptacle Outlets.**

The intrinsic evidence here clearly supports that the ordinary meaning of the *claimed* "load terminals" cannot include receptacle outlets. Besides the '340 patent, it is undisputed that the '386 patent, a related patent with two inventors in common, may be applied "with equal force" to determine the ordinary meaning of the *claimed* "load terminals." See Trimone Br. 14-15; Comm'n Br. 42-44; P&S Br. 21-25; see also *Elkay Mfg. Co. v. Ebco Mfg. Co.*, 192 F.3d 973, 980 (Fed. Cir. 1999).

Undisputed is also the fact that the '340 patent never refers to receptacle outlets as "load terminals" and *every* drawing depicting load terminals and receptacle outlets unequivocally labels them as distinct components. Compare A439 at 1:27-33 with A439 at 2:12-16; see also A434; A432; A435-36; A438.

Undisputed is yet another fact that the '386 patent describes receptacle outlets (also referred to as "user load terminals" and "receptacle terminals") and

“load terminals” as distinct components. A420 at 1:67-2:2; A424 at 10:36-39, 10:52-55; A425 at 11:44-48.

The parties also do not dispute the fact that the inventors used the term “user load terminals” in addition to the term “load terminals” in the elements of claim 8 of the ’386 patent, thereby ascribing different meanings to these two terms. A426-27; *see* Trimone Br. 17; *see also* *CAE Screenplates, Inc. v. Heinrich Fiedler GmbH & Co. KG*, 224 F.3d 1308, 1317 (Fed. Cir. 2000).

Unsurprisingly, the Commission did not, and could not, cite any intrinsic evidence supporting its claim construction that the *claimed* “load terminals” include receptacle outlets. Comm’n Br. 43.

P&S, on the other hand, cited a single passage in the ’340 patent to support the Commission’s construction:

The electric circuits may typically include one or more receptacle outlets and may further transmit AC power to one or more electrically powered devices, commonly referred to in the art as load circuits. The receptacle outlets provide power to user-accessible loads that include a power cord and plug, the plug being insertable into the receptacle outlet.

A439 at 1:27-33.

P&S argument cannot withstand any scrutiny, however. Nothing in the above passage suggests that the *claimed* “load terminals” include receptacle outlets. The passage does not even refer to “load terminals.” At best, the passage may be interpreted to imply that receptacle outlets are “user load terminals” or

“user-accessible load terminals” that are used to “further transmit” AC power to load circuits – consistent with Trimone’s position that the ’340 patent never refers to receptacle outlets as “load terminals” and always describes the “load terminals” and receptacle outlets as distinct components.

**D. The Extrinsic Evidence, While Inconclusive, Is Consistent with Trimone’s Construction that the Ordinary Meaning of the *Claimed* “Load Terminals” Cannot Include the Receptacle Outlets.**

The Commission and P&S primarily relied on extrinsic evidence in the form of witness testimony to support their argument that the *claimed* “load terminals” include receptacle outlets. *See, e.g.*, Comm’n Br. 43; P&S Br. 21. The witness testimony, however, lacked proper “temporal context,” as it did not address the ordinary meaning of the term *at the time of the invention*. *See* A40407 at 891:3-10; A40408 at 892:9-18; A40377 at 777:20-A40378 at 778:3; A40938 at 2978:18-2979:1.

On the question of the validity of the ’340 patent, the Commission and P&S attacked GPG’s and Trimone’s challenge, arguing that the testimony on that question “did not relate to the appropriate time frame” (Comm’n Br. 53) and that the experts “were asked questions in the present tense and answered in the present tense” and “[a]ccordingly, the Commission found that Trimone failed to clearly prove that a person of ordinarily skill would have known how to make the modification GPG proposes as of the effective filing date.” P&S Br. 35 (emphasis

added). On the present issue of claim construction, however, the Commission and P&S completely ignored the fact that the witnesses also “answered in the present tense” and “did not relate to the appropriate time frame,” nevertheless advocating that the witness testimony supports their contention that the *claimed* “load terminals” include receptacle outlets.

Even assuming, *arguendo*, that the witness testimony had the proper temporal context, it is undeniable that the witnesses never referred to receptacle outlets as “load terminals,” but rather as “user load terminals” or “user accessible load terminals.” *See, e.g.*, A40377 at 777:20-A40378 at 778:10; A40938 at 2978:18-2979:1.

In fact, a closer examination of the testimony of P&S’s own expert witness, Dr. Harman, reveals that his testimony actually supports Trimone’s position that receptacle outlets are not the claimed “load terminals.” Dr. Harman testified that “load terminals would be the terminals for any other devices or *outlets* or appliances that would be connected to the [GFCI] device.” A40408 at 892:9-18 (emphasis added). Therefore, he considered receptacle outlets as well as other devices and appliances as *components distinct* from the load terminals. In other words, not only did he *not* testify that the load terminals include receptacle outlets, but he actually admitted to the contrary – that receptacle outlets are not load terminals.

More tellingly, P&S' own witness, Mr. Osterbrock, referred to the "user load terminals" or "user accessible load terminals" as being different from "load terminals" in his answers to questions by Trimone's counsel at trial:

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...

20 Q. You had testified an objective of the  
21 G5 product was to separate the, I believe you  
22 referred to them as the user load terminals  
23 from the load terminals; is that correct?  
24 A. Yes.  
25 Q. By user load terminals, you mean the

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1 outlets on the GFCI; is that correct?  
2 A. Yes, the place where somebody plugged  
3 something in.  
4 Q. And is the reason you want to separate  
5 the outlets from the load terminals of the GFCI  
6 is to protect against miswiring of the GFCI; is  
7 that correct?  
8 A. To protect the face terminals, the  
9 user accessible load terminals from being  
10 energized if the product is miswired.

A40377 at 777:20-A40378 at 778:10 (emphasis added).

Further assuming, *arguendo*, that the witnesses did testify that receptacle outlets have the *claimed* "load terminals," this extrinsic evidence in the form of witness testimony should be discounted, because it would be clearly at odds with the claim construction mandated by the intrinsic evidence. *Phillips*, 415 F.3d at 1318.

Additionally, P&S cited the DiSalvo reference for support:

DiSalvo . . . confirms the outlets include load terminals. A46400[6:42-46] (“The user accessible load phase connection for this embodiment includes terminal assembly 58 having two binding terminals 60 which are capable of engaging a prong of a male plug inserted therebetween.”)

P&S Br. 22.

P&S argument, again, cannot withstand any scrutiny. Nothing in the above citation suggests that the *claimed* “load terminals” include receptacle outlets. Arguably, it may be interpreted that receptacle outlets are “user load terminals” or “user accessible load terminals,” again consistent with Trimone’s position that the “load terminals” are components distinct from the receptacle outlets.

Therefore, the extrinsic evidence, while inconclusive, is consistent with Trimone’s construction that the ordinary meaning of the *claimed* “load terminals” cannot include receptacle outlets.

**E. There Is No Substantial Evidence that Trimone’s 2006 GFCIs Have the Claimed “Four Sets of Interrupting Contacts that Are Configured to Provide Electrical Continuity Between the Line Terminals and the Load Terminals.”**

The Commission and P&S do not dispute that Trimone’s 2006 GFCIs do not have the claimed “four sets of interrupting contacts that are configured to provide electrical continuity between the line terminals and the load terminals” under Trimone’s claim construction. *See* Comm’n Br. 42-44; P&S Br. 21-25. Therefore, this Court should reverse the Commission’s finding that Trimone’s 2006 GFCIs

infringe the '340 patent, vacate the limited exclusion order with respect to Trimone, and direct the Commission to enter a determination that Trimone has not violated Section 337.

Respectfully submitted,



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## PROOF OF SERVICE

I, Lei Mei, hereby certify that on February 9, 2010, two copies of the foregoing REPLY BRIEF OF APPELLANT WENZHOU TRIMONE SCIENCE & TECHNOLOGY ELECTRIC CO., LTD, were served by overnight delivery on counsel of record as follows:

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