

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NEARMAP US, INC.,
Petitioner,

v.

PICTOMETRY INTERNATIONAL CORP.,
Patent Owner.

IPR2022-00733
Patent 8,542,880 B2

Before THOMAS L. GIANNETTI, GARTH D. BAER, and
RUSSELL E. CASS, *Administrative Patent Judges*.

BAER, *Administrative Patent Judge*.

JUDGMENT
Final Written Decision
Determining All Challenged Claims Unpatentable
35 U.S.C. § 318(a)

I. INTRODUCTION

A. BACKGROUND

Nearmap US, Inc. (“Petitioner”) filed a Petition (Paper 2, “Pet.”), requesting an *inter partes* review of claims 1–20 (the “challenged claims”) of U.S. Patent No. 8,542,880 B2 (Ex. 1001, “the ’880 patent”). Pictometry International Corp. (“Patent Owner”) filed a Preliminary Response to the Petition. Paper 9. Pursuant to 35 U.S.C. § 314, we instituted this *inter partes* review as to all of the challenged claims and all grounds raised in the Petition. Paper 10. Following institution, Patent Owner filed a Response. Paper 14 (“PO Resp.”). Petitioner filed a Reply to Patent Owner’s Response (Paper 18, “Pet. Reply”), and Patent Owner filed a Sur-reply (Paper 23, “PO Sur-reply”). On August 8, 2023, we held an oral hearing. A transcript of the hearing is included in the record. Paper 27.

We have jurisdiction under 35 U.S.C. § 6. This decision is a Final Written Decision issued pursuant to 35 U.S.C. § 318(a). For the reasons we discuss below, we determine that Petitioner has proven by a preponderance of the evidence that the challenged claims are unpatentable.

B. RELATED PROCEEDINGS

The ’880 patent is at issue in *Eagle View Techs. v. Nearmap US*, 2-21-cv-00283 (D. Utah) and *Eagle View Techs. v. GAF Materials LLC*, DNJ-1-21-cv-10669 (D. NJ). Pet. 91; *see* Paper 6, 2. The ’880 patent is also the challenged patent in IPR2016-00594. Pet. 91.

C. REAL PARTIES IN INTEREST

Petitioner identifies itself as the only real party in interest. Pet. 90. Patent Owner identifies itself and Eagle View Technologies, Inc., as real parties in interest. Paper 3, 2.

D. THE '880 PATENT

The '880 patent relates to a system for determining the attributes of a real-world three-dimensional building. Ex. 1001, Code (57). In one embodiment, first location data corresponding to the location of a building is input by a user, and visual access of an aerial image of a region including the roof structure of the building corresponding to the first location data is provided. *Id.* at 9:50–10:15, 11:9–16, Figure 3. A moveable visual marker, provided in the region corresponding to the first location, is capable of being moved to the top of the building to more precisely identify the location of the building roof structure. *See id.* The relocated visual marker acts as a final location with location coordinates. *See id.* The user accepts the visual marker's final location, and one or more oblique images of an aerial imagery database corresponding to the location coordinates of the final location are provided to the user. *Id.* at 1:33–56.

E. CHALLENGED CLAIMS

Petitioner challenges claims 1–20. Of the challenged claims, claims 1 and 14 are independent. Independent claim 1 is representative and is reproduced below:

1. A process for determining attributes of a roof structure of a real-world three-dimensional building, comprising the acts of:
providing at least one computer input field for a user to input first location data generally corresponding to the location of the building;
providing visual access to an aerial image of a region including the roof structure of the building corresponding to said first location data, the aerial image taken from a straight down overhead view with respect to the roof structure;

on the aerial image of the region, providing a visual marker that is moveable on a computer monitor around said region, said visual marker initially corresponding to said first location data, wherein said visual marker may be moved to a final location on top of the building to more precisely identify the location of the building roof structure, the final location having location coordinates;

providing a computer input capable of signaling user-acceptance of the final location of said marker; and

providing visual access to one or more oblique images of an aerial imagery database corresponding to location coordinates of the final location.

Ex. 1001, 13:53–14:8.

F. ASSERTED GROUNDS OF UNPATENTABILITY

Petitioner asserts the following grounds of unpatentability. Pet. 2.

Claims Challenged	(35 U.S.C. §)¹	Reference(s)/Basis
1–20	103	Kennedy ² , Florance ³ , Kreft ⁴
1–3, 8–16, 20	103	Keane ⁵ , Florance, Kreft
4–7, 17–19	103	Keane, Florance, Kreft, Kennedy

Petitioner also relies on a declaration from Dr. David Forsyth (Ex. 1003).

¹ Because the parties agree that the challenged claims of the challenged patent have an effective filing date before March 16, 2013, we apply the pre-AIA (“America Invents Act”) version of § 103. Leahy-Smith America Invents Act (“AIA”), Pub. L. No. 112-29, 125 Stat. 284, 285–88 (2011).

² US 8,417,061 B2, Apr. 9, 2013 (Ex. 1004, “Kennedy”).

³ US 2009/0132316 A1, Pub. May 21, 2009 (Ex. 1005, “Florance”).

⁴ US 7,373,244 B2, May 13, 2008 (Ex. 1006, “Kreft”).

⁵ US 2008/0279452 A1, Pub. Nov. 13, 2008 (Ex. 1007, “Keane”).

II. PRELIMINARY MATTERS

A. LEVEL OF ORDINARY SKILL

Petitioner contends a person of ordinary skill in the art at the time of the '880 patent “would have had at least a Bachelor’s Degree in an academic area emphasizing the design of electrical, computer, or software technologies, or a similar discipline, and at least two years of experience related to computerized image analysis and three-dimensional modeling.” Pet. 7. Further, “education could compensate for a deficiency in work experience, and vice-versa.” *Id.* Patent Owner does not provide a formulation for a person of ordinary skill. We adopt Petitioner’s description as it is consistent with the prior art and patent specification before us and supported by credible expert testimony. *See Okajima v. Bourdeau*, 261 F.3d 1350, 1355 (Fed. Cir. 2001) (prior art itself may reflect an appropriate level of skill).

B. CLAIM CONSTRUCTION

Patent Owner proposes that we construe the phrase “providing visual access to one or more oblique images of an aerial imagery database corresponding to location coordinates of the final location” in claims 1 and 14 to mean “accessing an aerial imagery database to retrieve the one or more oblique images corresponding to location coordinates of the user-accepted final location and displaying the one or more oblique images retrieved from the aerial imagery database.” PO Resp. 9. Petitioner asserts that Patent Owner’s construction is flawed because providing visual access does not require “accessing an aerial imagery database.” Pet. Reply 3.

We agree with Petitioner. The plain meaning of the limitation at issue requires only displaying (“providing visual access”) to images that have come from an aerial image database (“images of an aerial imagery

database”). As Petitioner notes, however, nothing in the term’s plain language requires accessing a database. *Id.* Moreover, as Petitioner notes, the doctrine of claim differentiation undermines Patent Owner’s construction because dependent claim 3 expressly recites the database-access step Patent Owner seeks to add to claim 1, which does not have that language. *Id.* at 5. *See, e.g., InterDigital Commc’ns, LLC v. ITC*, 690 F.3d 1318, 1324 (Fed. Cir. 2012) (“The doctrine of claim differentiation is at its strongest in this type of case, ‘where the limitation that is sought to be “read into” an independent claim already appears in a dependent claim.’” (quoting *Liebel-Flarsheim Co. v. Medrad, Inc.*, 358 F.3d 898, 910 (Fed. Cir. 2004))). Thus, for the reasons above, we agree with Petitioner that the claimed “providing visual access to one or more oblique images of an aerial imagery database” step in claim 1 does not require accessing an aerial imagery database to retrieve the one or more oblique images.

C. DESCRIPTION OF PRIOR ART REFERENCES IN GROUND 1

1. Kennedy (Ex. 1004)

Kennedy discloses a system for “determin[ing] the measurements of a roof.” Ex. 1004, Code (57). Kennedy’s Figure 35 is reproduced below.

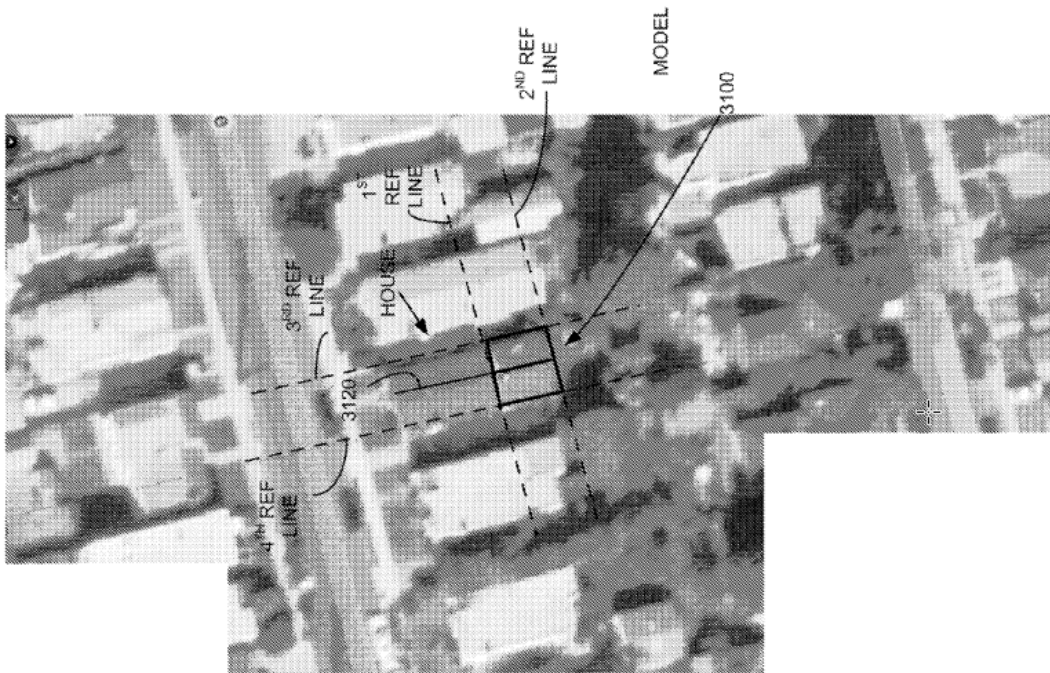


FIG. 35

Figure 35 is “a top plan view of a roof . . . obtained from a geographical information service.” *Id.* at 3:41–43.

Kennedy’s Figure 36 is reproduced below.

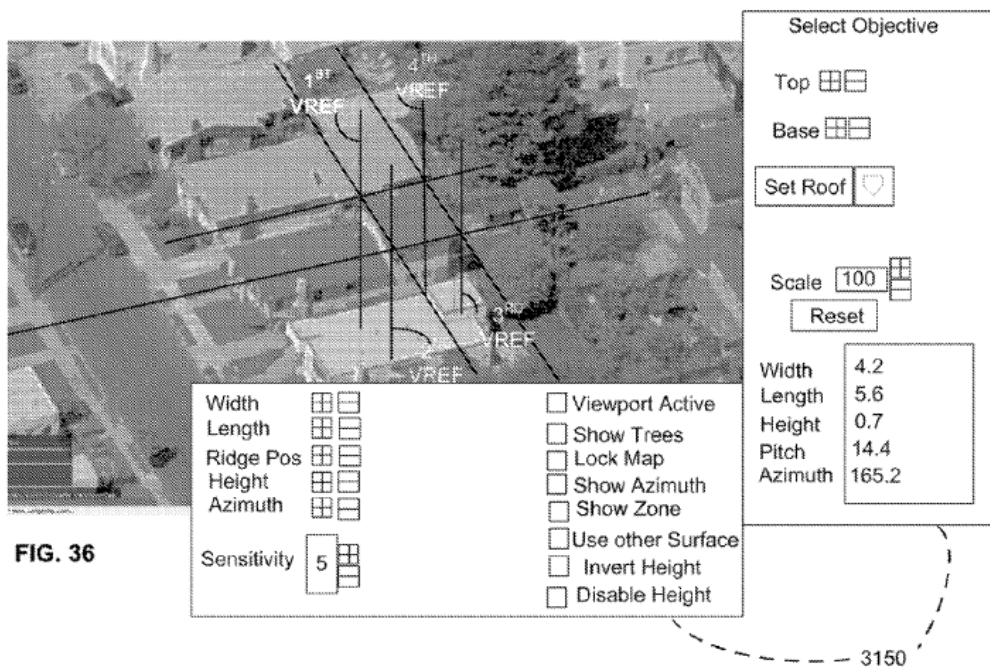


FIG. 36

Figure 36 is “a perspective view of the roof” in Figure 35. *Id.* at 3:46–47.

2. Florance (Ex. 1005)

Florance discloses a system “for associating an aerial image with map features and information concerning objects appearing in the image.”

Ex. 1005, Code (57). Florance teaches that “a user looks at the image of the property in the aerial image and the position of [an] icon, determines a more accurate position for the icon, and moves the icon (e.g., by clicking and dragging) to [a] more accurate position.” *Id.* ¶ 624.

3. Kreft (Ex. 1006)

Kreft describes methods for “locating points of interest [POIs]” on geographic maps. Ex. 1006, Code (57). Kreft explains that “[a] variety of symbols or icons are used to mark POI’s on a map.” *Id.* at 15:57–58.

According to Kreft, users may move these POI markers and confirm the marker’s new location via a dialog box. *Id.* at 18:13–14, 18:63–66.

III. UNPATENTABILITY ANALYSIS

A. OBVIOUSNESS OF CLAIMS 1–20 BASED ON KENNEDY, FLORANCE, AND KREFT

In its first asserted ground, Petitioner contends claims 1–20 would have been obvious over Kennedy, Florance, and Kreft. Pet. 8–59. For the reasons explained below, we find Petitioner has shown that claims 1–20 would have been obvious over the references by a preponderance of evidence.

1. Petitioner’s Proposed Combination

Petitioner describes its proposed combination as follows:

[A]n aerial image obtained using an entered address for a building in Kennedy is overlaid with a marker that represents the building and that is movable from a “preliminary position . . . [that]

represents an approximate location of the property” containing the building to “[a] more accurate position . . . in the center of the property or the center of the building on the property,” as described in Florance. After the marker that represents the building has been moved to the new location, the new location can be confirmed through a dialog box to update location information for the building such as a GPS coordinates of a “geocoded address” of the building, as described in Kreft. The updated location information, geocoded address using new GPS coordinates, is then used to obtain oblique aerial images, as described in Kennedy.

Pet. 17–18 (citations omitted).

Petitioner further explains that a skilled artisan

would have been motivated and found it obvious to combine Kennedy and Florance to improve the utility of Kennedy’s system by enabling users to easily update location information for buildings using movable markers in order to more accurately represent the locations of the buildings, and, thereby, “ensure[] that [aerial images obtained by] a geographically-based search . . . encompasses only the appropriate propert[y] within the defined geographic area” of the aerial images.

Id. at 18–19 (quoting Ex. 1006 ¶ 627). In addition, as Petitioner explains, a skilled artisan would have been motivated to “modify the combination of Kennedy and Florance based on the teachings of Kreft in order to provide users the ability to confirm or cancel updates to marker locations before location information for buildings is updated, thereby improving the accuracy of the stored location information.” *Id.* at 22.

Patent Owner raises several arguments in contesting Petitioner’s challenge. We discuss those arguments below.

2. Providing Visual Access to Aerial and Oblique Images

Independent claims 1 and 14 require “providing visual access to an aerial image . . . corresponding to said first location data” as well as

“providing visual access to one or more oblique images . . . corresponding to location coordinates of the final location.” Ex. 1001, 13:59–14:8, 14:59–15:5. Petitioner asserts that Kennedy teaches this feature because it teaches “retriev[ing] aerial photographs of a building,” Pet. 26, as well as “obtain[ing] . . . oblique aerial images (e.g., ‘perspective views’) of the building,” *id.* at 34. Patent Owner asserts Kennedy is deficient because “Kennedy only discloses obtaining (or retrieving) images via a single image retrieval step” instead of “performing a second image retrieval step to obtain oblique aerial images *after* the system retrieves and presents a vertical aerial image of a building,” as the claims require. PO Resp. 13; *see id.* at 15–20.

We disagree with Patent Owner’s argument for two reasons. First, Patent Owner’s argument relies on its construction of “providing visual access to one or more oblique images.” We decline to adopt that construction for the reasons outlined above in Section II.B. In short, although claims 1 and 16 recite two separate “providing visual access” steps, they do not recite any database-access steps. Petitioner’s proposed combination—Kennedy’s Figure 35 vertical image, followed by Florance’s marker movement and Kreft’s confirmation, producing Kennedy’s Figure 36 oblique image, *see* Pet. 17–18, 37—would provide both visual-access steps. Second, we agree with Petitioner that its combination is sufficient even under Patent Owner’s proposed construction. *See* Pet. Reply 10–12. Specifically, Petitioner’s rationale for combining the references (i.e., improving accuracy, *see* Pet. 18–20) explains why one skilled in the art would have retrieved Kennedy’s two images in separate steps, separated by a user’s confirmation. *Id.*; *see* Pet. 37 (describing the sequence). Patent Owner’s argument, in contrast, assumes a skilled artisan could do no more than bodily incorporate Kennedy’s single

image-retrieval step. That, however, is not the test for obviousness. *See, e.g., Allied Erecting & Dismantling Co. v. Genesis Attachments, LLC*, 825 F.3d 1373, 1381 (Fed. Cir. 2016); *see also KSR Int’l Co. v. Teleflex Inc.*, 550 U.S. 398, 418 (2007) (noting that “a court can take account of the inferences and creative steps that a person of ordinary skill in the art would employ”).

For these reasons, and in light of the Petition’s analysis, *see* Pet. 27–37, we agree with Petitioner that its proposed combination teaches “providing visual access to an aerial image . . . corresponding to said first location data” as well as “providing visual access to one or more oblique images . . . corresponding to location coordinates of the final location.”⁶

3. Non-Transient Computer Memory

Independent claim 14’s preamble recites “[a] non-transient computer memory storing computer logic, that when executed by computer hardware causes the computer hardware to determine attributes of a roof structure of a real-world three-dimensional building.” Ex. 1001, 14:49–52. Patent Owner asserts that Petitioner’s Kennedy-based obviousness challenge to claims 14–20 fails because it does not address this non-transient-computer-memory feature, but instead relies on its earlier analysis that addresses claims without that feature. PO Resp. 20–23. We disagree with Patent Owner’s argument.

First, it is clear that Kennedy’s system includes the claimed “non-transient computer memory storing computer logic.” *See, e.g.,* Pet. 8 (noting

⁶ Patent Owner asserts this same single-image-retrieval-step deficiency in Kennedy is fatal to Petitioner’s obviousness challenge to dependent claims 3 and 16, which require “using . . . latitude and longitude coordinates to access imagery from the second imagery database.” PO Resp. 19–20. We disagree because, as explained above, Petitioner’s asserted combination and rationale adequately account for a second image retrieval step.

that “Kennedy discloses an Internet-based mapping system”); *see also, e.g.*, Ex. 1004, Code (57) (“An exemplary system comprises a computer including . . . a working memory.”), *id.* at 4:48–53 (“[C]ommercially available processors, memory modules, input/output ports and other commercially available hardware components are suitable for use in constructing embodiments of [the] system.”). In addition, the at-issue memory language appears in claim 14’s preamble. As a general rule, a claim’s preamble is not limiting unless it “is necessary to give life, meaning and vitality to the claim.” *Allen Eng’g Corp. v. Bartell Indus., Inc.*, 299 F.3d 1336, 1346 (Fed. Cir. 2002) (internal quotation marks omitted). Although, as Patent Owner notes, a different preamble term (“a roof structure”) provides an antecedent basis for later-used term, *see* PO Resp. 21, that “does not necessarily convert the entire preamble into a limitation.” *TomTom, Inc. v. Adolph*, 790 F.3d 1315, 1323 (Fed. Cir. 2015). Here, claim 14 does not recite any step related to the preamble’s memory. Because claim 14 describes a structurally complete invention without the preamble’s non-transient computer memory, we find that phrase is not limiting.

4. Rationale for Combining Kennedy and Florance

Petitioner explains that a skilled artisan would have been motivated to include Florance’s movable markers in Kennedy’s search so that users could easily update location information “to more accurately represent the locations of the buildings” and thereby ensure that searches “encompass[] only the appropriate propert[y] within the defined geographic area.” Pet. 18–19 (quoting Ex. 1005 ¶ 627); *see id.* at 36. Patent Owner argues that Petitioner’s rationale for combining Kennedy and Florance is insufficient for several reasons. First, Patent Owner faults Petitioner for relying on passages in

Florance related to accuracy because, Patent Owner contends, Florance deals with accuracy in pre-defined geographic-search areas, not in images. *See* PO. Resp. 24–27. Patent Owner also criticizes Petitioner’s statement that “Kennedy describes [location information] as ‘often’ inaccurate,” because “nowhere in Kennedy’s specification does the term ‘often’ appear let alone any description that there is a need to ‘update location information for a building’ because it is ‘often’ inaccurate.” *Id.* at 27–28.

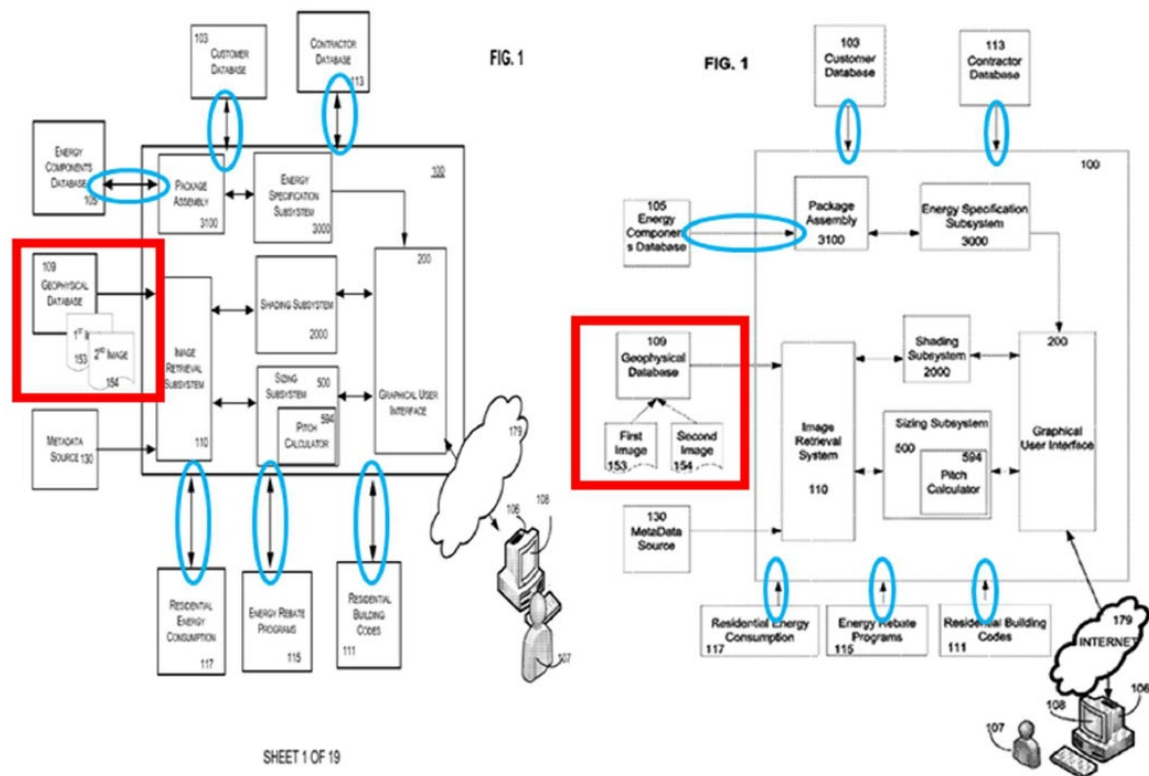
We disagree with Patent Owner because even if Florance addresses accuracy in pre-defined geographic-search areas rather than images, that does not undermine Petitioner’s general contention that using Florance’s method (i.e., moving a marker from a preliminary position to a property’s center) would ultimately improve accuracy and exclude unwanted properties in Kennedy’s oblique images. Likewise, even if Kennedy never asserts that location information is often inaccurate, that does not undermine Petitioner’s rationale because Petitioner’s reason to combine references need not be explicit in the prior art. *See KSR*, 550 U.S. at 419. Given Petitioner’s accuracy-improvement rationale, Petitioner has articulated sufficient reasoning with rational underpinning to support its assertion that including Florance’s movable markers in Kennedy’s system would have been obvious to one skilled in the art. *See id.* at 418, 419.

5. Kennedy’s Figures 1 and 36

Patent Owner argues Petitioner’s obviousness challenge fails because Petitioner relies on Kennedy’s Figures 1 and 36, which are not prior art to the challenged claims. PO Resp. 31–36. Patent Owner explains that the versions of Figures 1 and 36 that appear in the Petition are replacement drawings that were filed after the ’880 patent’s priority date. *Id.* at 31. According to Patent

Owner, the Petition is fatally flawed because it uses the replacement drawings “as part of [its] basis for challenging” multiple claim elements. *Id.* at 33–34.

As-filed and as-issued Figure 1 is reproduced below, with annotations added.



PO Resp. 33. As-filed Figure 1 is shown above, left, while as-issued Figure 1 is shown above right. As-filed and as-issued Figure 36 is reproduced below, with annotations added.



PO Resp. 32. As-filed Figure 36 is shown above, left, while as-issued Figure 36 is shown above right.

We disagree with Patent Owner’s argument that the Petition is “fatally flawed” because it relies on issued Figures 1 and 36 rather than the as-filed versions. Patent Owner does not identify any specific instances in which the Petition actually relies on the added material missing from the as-filed versions. *See* PO. Resp. 33–34. Instead, Patent Owner makes a general assertion that “Petitioner relies on issued Figs. 1 and 36, including the newly added portions, throughout their analysis,” followed by a cite to every instance in which the Petition cites to either Figure 1 or Figure 36. *Id.* However, as Petitioner explains, the figures’ relatively minor changes do not impact Petitioner’s assertions regarding how Kennedy teaches each claim limitation. Pet. Reply 18–20; *see* Pet. 26–59. Patent Owner does not contest Petitioner’s assertion in this regard. *See generally* PO Sur-reply. In these circumstances, we decline to fault Petitioner for reproducing the issued versions of Figures 1 and 36 rather than the as-filed versions.

6. Remaining Uncontested Limitations

As for the remaining limitations of claims 1–20, Petitioner provides a detailed analysis demonstrating that Kennedy’s, Florance’s, and Kreft’s combined disclosures teach every element of the challenged claims. *See* Pet. 25–59. For example, Petitioner presents evidence that Kennedy’s address-input interface and aerial photograph retrieval teaches the independent claims’ “computer input field” that provides “visual access to an aerial image.” Pet. 26–29. Petitioner presents evidence that Florance’s overlaid icon teaches the claimed movable “visual marker.” *Id.* at 29–31. Petitioner presents evidence that Kreft’s Figure 19 shows user dialog box 1905, which Petitioner corresponds to the claimed “computer input capable of signaling user-acceptance.” *Id.* at 32–33. Petitioner also presents evidence that Kennedy’s perspective views teach the claimed “oblique images.” *Id.* at 34–37. Petitioner further presents evidence that its asserted Kennedy/Florance/Kreft combination teaches the additional limitations recited in the challenged dependent claims. *Id.* at 38–59.

Other than the arguments addressed above, Patent Owner does not additionally challenge Petitioner’s obviousness showing based on Kennedy, Florance, and Kreft. We have reviewed Petitioner’s arguments and evidence and, based on that analysis, we find Petitioner has shown by a preponderance of the evidence that claims 1–20 would have been obvious over Kennedy, Florance, and Kreft.

B. PROCEDURAL REQUIREMENTS UNDER 37 C.F.R. § 42.104(B)(3)–(4)

Patent Owner argues that Petitioner fails to meet its burden under 37 C.F.R. § 42.104(b)(3), which requires the Petition to identify “[h]ow the challenged claim is to be construed.” PO Resp. 70–71. Specifically, Patent

Owner criticizes Petitioner for failing to identify express claim constructions from a prior *inter partes* review involving the '880 patent and for failing to identify claim-term definitions expressly provided in the '880 patent. *Id.*

We disagree with Patent Owner's argument. Under our Rule 42.104(b)(3)–(4), a Petition must identify “[h]ow the challenged claim is to be construed” and “[h]ow the construed claim is unpatentable,” by “specif[ing] where each element of the claim is found in the prior art.” 37 C.F.R. § 42.104(b)(3)–(b)(4). Here, the Petition identifies that “no formal claim constructions are necessary.” Pet. 7. With this understanding, Petitioner identifies where the prior art teaches each claim element, and does so without the need for additional, express constructions. *Id.* at 25–59, 67–84. In the context of this *inter partes* review, we determine that this is sufficient. Our interpretation of Rule 42.104(b) is consistent with its regulatory history, which indicates that the goal for setting forth claim construction is to provide sufficient notice to Patent Owner, which Petitioner has adequately done here. *See* 77 Fed. Reg. 48,688; *id.* at 48,699–700.

C. ALTERNATIVE OBVIOUSNESS GROUNDS

In its second and third obviousness grounds, Petitioner asserts that claims 1–3, 8–16, and 20 would have been obvious over Keane, Florance, Kreft, and that claims 4–7 and 17–19 would have been obvious over Keane, Florance, Kreft, and Kennedy. Pet. 59–84. Because Petitioner has shown these same claims would have been obvious in its first ground, we do not address these two alternative grounds.

IV. CONCLUSION

For the foregoing reasons, we determine Petitioner has demonstrated by a preponderance of the evidence that claims 1–20 of the '880 patent are unpatentable.⁷ Our conclusions are summarized in the following table.

Claim(s)	35 U.S.C. §	Reference(s)/Basis	Claims Shown Unpatentable	Claims Not shown Unpatentable
1–20	103	Kennedy, Florance, Kreft	1–20	
1–3, 8– 16, 20	103	Keane, Florance, Kreft ⁸		
4–7, 17– 19	103	Keane, Florance, Kreft, Kennedy ⁹		
Overall Outcome			1–20	

V. ORDER

In consideration of the foregoing, it is hereby:

ORDERED that claims 1–20 of the '880 patent are unpatentable; and

⁷ Should Patent Owner wish to pursue amendment of the challenged claims in a reissue or reexamination proceeding subsequent to the issuance of this decision, we draw Patent Owner's attention to the April 2019 *Notice Regarding Options for Amendments by Patent Owner Through Reissue or Reexamination During a Pending AIA Trial Proceeding*. See 84 Fed. Reg. 16,654 (Apr. 22, 2019). If Patent Owner chooses to file a reissue application or a request for reexamination of the challenged patent, we remind Patent Owner of its continuing obligation to notify the Board of any such related matters in updated mandatory notices. See 37 C.F.R. § 42.8(a)(3), (b)(2).

⁸ We do not reach this ground because it would not change the outcome of this case.

⁹ We do not reach this ground because it would not change the outcome of this case.

FURTHER ORDERED that, because this is a Final Written Decision, parties to the proceeding seeking judicial review of the decision must comply with the notice and service requirements of 37 C.F.R. § 90.2.

PETITIONER:

W. Karl Renner
Thomas Rozylowicz
Daniel D. Smith
W. Ryan Klima
Patrick Darno
Patrick Bisenius
Craig Deutsch
Yao Wang
FISH & RICHARDSON P.C.
axf-ptab@fr.com
tar@fr.com
dsmith@fr.com
klima@fr.com
darno@fr.com
bisenius@fr.com
deutsch@fr.com
ywang@fr.com

PATENT OWNER:

Kyle Howard
Gregory Webb
Jonathan Bowser
HAYNES AND BOONE, LLP
kyle.howard.ipr@haynesboone.com
greg.webb.ipr@haynesboone.com
jon.bowser.ipr@haynesboone.com