

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

BUERGOFOL GMBH, Plaintiff, vs. OMEGA LINER COMPANY, INC., Defendant.	Civil Action No.: 22-cv-04112-KES BUERGOFOL’S RESPONSES TO OMEGA’S INTERROGATORIES TO BUERGOFOL (SET THREE) (Nos. 14)
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PROPOUNDING PARTY: OMEGA LINER COMPANY, INC.

RESPONDING PARTY: BUERGOFOL GMBH

SET NUMBER: THREE (3)

To OMEGA and its attorneys of record:

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiff

BUERGOFOL GMBH (“Buergofol”) hereby responds to Defendant OMEGA LINER COMPANY, INC.’s (“Omega”) Set Three of Interrogatories.

RESPONSES

INTERROGATORY NO. 14:

List, for each of the Claims-in-Suit, (a) each product, device, process, act, or method alleged to infringe, (b) a chart identifying where specifically each element of each of the Claims-in-Suit is found in each product, device, process, act, or method, (c) the priority date to which each of the Claims-in-Suit is allegedly is entitled, and (d) whether each element of each of the Claims-in-Suit is claimed to be literally present

or present under the doctrine of equivalents (if Buergofol asserts that any element of any of the Claims-in-Suit is present under the doctrine of equivalents, explain each function, way, and result that is equivalent and why any differences are not substantial).

RESPONSE TO INTERROGATORY NO. 14:

Interrogatory number 14 is a contention interrogatory, and Buergofol answers the interrogatory here as a contention interrogatory in accordance with Fed.R.Civ.P. 33 with respect to what Buergofol currently contends given Buergofol's current analysis of the law and given Buergofol's current understanding of relevant facts and the status of discovery. Requesting Party Omega Liner Company, Inc. ("Omega") is not cooperating in fact discovery and to date Omega has failed to produce evidence indicating the structure and composition of each individual liner Omega has made, and has failed to admit it made OMEGA LINER using inner and outer film of the same diameter purchased from the same film supplier in the same time frame, and has obstructed Buergofol's attempts to obtain factual infringement information pursuant to a third-party subpoena to Subsurface, Inc. Fact discovery into the extent of Omega's infringement of the Patents-in-Suit is ongoing, and Buergofol's understanding of the facts bearing on Omega's infringement contentions will likely change in the future as discovery proceeds and responses to Buergofol discovery requests are compelled by the Court and as factual evidence of individual instances of OMEGA LINER are revealed. In the future, if and when Buergofol changes its contentions due to discovery of factual evidence not now known, or if Buergofol comes to learn that its answer to this interrogatory is incomplete or incorrect, Buergofol will at that time update its answer to contention interrogatory number 14 pursuant to Fed.R.Civ.P. 26(e) as appropriate. Based on currently known information, Buergofol answers that Buergofol contends that Omega has literally infringed claims 1, 3-7, 10 and 11 of U.S. Patent No. 9,657,882 ('882 Patent) by making and selling UV-CIPP liners called "OMEGA LINER" that fall within the scope of claims 1, 3-7, 10 and 11. Patent infringement under 35 USC 271 is proven if infringement is

shown to the preponderance of the evidence standard, and in the case of Omega's infringement of the '882 Patent circumstantial evidence points to the fact that Omega made OMEGA LINER falling within the literal scope of claim 1 of the '882 Patent. In contrast to this, there exists no evidence of any kind that any OMEGA LINER made by Omega did not fall within the literal scope of claim 1 of the '882 Patent. So by the preponderance of the evidence, Omega infringed claim 1 of the '882 Patent by making each OMEGA LINER that Omega has ever made, and by the preponderance of the evidence infringed claim 1 of the '882 Patent each time it sold one of those OMEGA LINERS. Buergofol contends that Omega made just one "product", and that is the product called "OMEGA LINER," so the chart below is a chart that identifies where each element of each asserted claim is found in the OMEGA LINER product.

Buergofol contends that every OMEGA LINER ever made by Omega was an insertion tube falling within the scope of claim 1 of the '882 Patent that included: 1) an external tubular film (the external film was impermeable to liquids, was colored, and at least partially blocked UV radiation), 2) an internal tubular film (the internal film had a layer that included an amount of a migrating compound, specifically EBS wax), and 3) a carrier material that was impregnated with UV-curable resin. Buergofol contends that each and every instance of OMEGA LINER that was sold by Omega included resin, because without resin the OMEGA LINER would not be usable.

More specifically, every known individual Omega inner film (inner tubular film): (i) "The 2021 Sample" (a portion of "The 2021 Sample" was produced to Omega with a letter from D. Wallace to M. Neustel dated 2/6/23 and BF2649), (ii) "The 2022 Sample" (a portion of "The 2022 Sample" was produced to Omega as BF2001 and mailed on 12/23/22 by US Mail from D. Wallace to M. Neustel), (iii) the numerous inner tubular films sold by Buergofol to Omega (as listed in BF2842-2843), and (iv) the numerous "Inner Foil" samples produced by Omega (OMEG-00001 thru OMEG-00010), included an external layer on the side of the inner film that faces the resin, where that external

layer included an amount of EBS wax. In contrast to this, no evidence has been produced in this case to date indicating that Omega ever made any instance of OMEGA LINER whose inner film did not meet the limitations of claim 1 with respect to the recited “inner tubular film.” Accordingly, as it currently stands, by the preponderance of the evidence, the evidence indicates that every instance of OMEGA LINER included an inner film that met the limitations of claim 1 with respect to the recited “inner tubular film.”

In addition, every individual Omega outer (external) film: (i) “The 2021 Sample” (a portion of “The 2021 Sample” was produced to Omega with a letter from D. Wallace to M. Neustel dated 2/6/23 and BF2649), (ii) “The 2022 Sample” (a portion of “The 2022 Sample” was produced to Omega as BF2001 and was mailed on 12/23/22 by US Mail from D. Wallace to M. Neustel), (iii) the numerous outer films sold by Buergofol to Omega (as listed in BF2842-BF2843), (iv) and the numerous “Outer Foil” samples produced by Omega (OMEG-00011 thru OMEG-00016), was colored and at least partially blocked UV radiation. In contrast to this, no evidence has been produced in this case to date indicating that Omega ever made any instance of OMEGA LINER whose outer film did not meet the limitations of claim 1 with respect to the recited “external tubular film.” Accordingly, as it currently stands, by the preponderance of the evidence, every instance of OMEGA LINER included an outer film that met the limitations of claim 1 with respect to the recited “external tubular film.”

Priority Date: The foreign application priority date as listed on the face of the ‘882 Patent for a claim whose subject matter is disclosed in the German application DE102013102394 is March 11, 2013, otherwise the foreign application priority date as listed on the face of the ‘882 Patent for the claim is the foreign filing date of August 21, 2013 for the German application DE102013109052.

Doctrine of Equivalents: By the preponderance of the evidence, all instances of the OMEGA LINER product fall within the literal scope of claim 1 of the ‘882 Patent. Every element that is literally present in OMEGA LINER as indicated in the claim chart

below is also present by the doctrine of equivalents using a function/way/result analysis, but Buergofol does not at this time advance the many possible function/way/result arguments and reasons because the claims if properly construed are literally infringed and there is no current need to resort to the doctrine of equivalents. If, however, the Court were to construe one or more claims in a way that were to allow OMEGA LINER to be deemed not to fall within the literal scope of the claim because an element is not literally present, then Buergofol will at that time change its contentions and advance an appropriate doctrine-of-equivalents argument directed to the appropriate element of the appropriate claim. Buergofol has not yet, at this point in this litigation, developed the evidence, including expert testimonial evidence, to establish a doctrine-of-equivalents argument directed to any element, and Buergofol answers the interrogatory based on Buergofol's current knowledge and current contentions. If Buergofol's contentions in this matter were to change in the future, then Buergofol will update its answer to this contention interrogatory under Fed.R.Civ.P. 26(e) at that time as appropriate.

Claim of '882 Patent	Where The Element Is Found
1. An insertion tube for use in trenchless sewage pipe renovation, comprising:	As indicated above to the preponderance of the evidence, each instance of OMEGA LINER was an insertion tube.
an opaque external tubular film that is impermeable to liquids and at least partially reflects or absorbs UV radiation or visible light of short wavelengths;	As indicated above to the preponderance of the evidence, each instance of OMEGA LINER had an external film that at least partially blocked UV radiation. In the case of the 2021 Sample, the external film of the 2021 Sample was tested and confirmed to meet all the limitations of claim 1 with respect to the "opaque external tubular film."
an inner tubular film;	As indicated above to the preponderance of the evidence, each instance of OMEGA LINER had an internal tubular film. The 2021 Sample is an instance of a complete OMEGA LINER that embodies all the limitations of claim 1 of the '882 Patent, including an inner tubular film.

a carrier material impregnated with a reactive plastic resin arranged between the external tubular film and the inner tubular film; and	As indicated above to the preponderance of the evidence, each instance of OMEGA LINER had a layer of carrier material disposed between the external tubular film and the internal tubular film, and this carrier layer was impregnated with an amount of UV curable resin. The 2021 Sample is an instance of a complete OMEGA LINER that embodies all the limitations of claim 1 of the '882 Patent, including a carrier material that was impregnated with an amount of UV-curable resin.
wherein the inner tubular film comprises: one or multiple layers an inner facing external side and an outer facing external side facing the carrier material; a coating of at least one of (1) a coating with a polysiloxane; or (2) a coating or covering with at least one migrating compound; and wherein the coating is applied over a section of or an entire circumferential area of the outer facing external side facing the carrier material.	As indicated above to the preponderance of the evidence, the inner film portion of each instance of OMEGA LINER had an external layer that faced the resin, and this external layer included an amount of a migrating compound, specifically EBS wax. The inner tubular film of the 2021 Sample was tested and confirmed to have a coating of a migrating compound that meets all the limitations of claim 1 of the '882 Patent with respect to the recited "inner tubular film."
3. The insertion tube according to claim 1, the inner tubular film further comprising a layer that contains a thermoplastic elastomer (TPE) within a range of more than 20% by weight up to 100% weight.	The full extent of Omega's infringement of claim 3 is unknown at this point given the current state of discovery in this case, but Buergofol contends that all instances of OMEGA LINER made using inner film purchased from Buergofol (BF2842-BF2843) fell within the scope of claim 3, and that is because the inner film had an external layer facing the resin of the OMEGA LINER, and this external layer entailed a mix of homo-polyamide and co-polyamide, where the co-polyamide was more than 20% by weight of the overall layer.
4. The insertion tube according to claim 1, wherein the inner tubular film has a total thickness of between 10µm and 5000µm.	All Omega inner film (of the 2021 sample, of the 2022 sample, of Buergofol's inner film sold to Omega, and of the inner film OMEG-00001 thru OMEG-00010) had a total thickness in the claimed range. There is no evidence that any OMEGA LINER ever had an inner film outside to the claimed range. So by the preponderance of the evidence, every instance of OMEGA LINER fell within the literal scope of claim 4.

5. The insertion tube according to claim 1, the inner tubular film further comprising at least one internal layer in the form of an adhesion promoter layer, wherein at least one of the external layers comprising the coating, and wherein: one of the external layers has at least one homo- and/or copolyamide and the other external layer has at least one thermoplastic olefin homo- or copolymer with a proportion by weight expressed in percent of more than 25% by weight, or both external layers contain at least one thermoplastic olefin homo- or copolymer, and there is one internal layer containing a homo and/or copolyimide with a proportion by weight expressed in percent or more than 25% by weight.	All Omega inner film (of the 2021 sample, of the 2022 sample, of Buergofol inner film sold to Omega, and of inner film OMEG-00001 thru OMEG-00010) had an external polyamide layer facing the resin, an internal adhesion promoter layer, and an external layer of thermoplastic olefin (polyethylene). There is no evidence that any OMEGA LINER ever had an inner film that did not meet the limitations of claim 5. Accordingly, to the preponderance of the evidence, Buergofol contends that every OMEGA LINER made fell within the literal scope of claim 5.
6. The insertion tube according to claim 5, the inner tubular film further comprising an additional internal layer comprising one of: an EVOH layer; a barrier material against oxygen, water vapor, or oil; or a thermoplastic homo and/or copolymer of polyethylene homopolymer (PE), LDPE, HDPE, or a polypropylene homopolymer (PP).	Buergofol contends that Omega has infringed claim 6 because the inner film of some of OMEGA LINER included an additional internal layer of polyethylene (PE). More particularly, the 2021 sample had such an additional internal layer, and some inner film sold by Buergofol to Omega had a PA/AP/PE/AP/PE structure that satisfied the claim limitations of claim 6 with respect to the “inner tubular film.” The 2022 sample, however, did not have such an additional PE internal layer. Accordingly, the full extent of Omega’s infringement of claim 6 is currently unknown, and is being investigated in discovery.
7. The insertion tube tubular film according to claim 5, wherein the coating has a thickness no more than 15µm.	In all instances of Omega inner film, the migrating compound on the surface of the inner tubular film had a thickness of less than 15µm, so Buergofol contends that any instance of OMEGA LINER that fell within the scope of claim 5 also fell within the scope of claim 7.
10. The insertion tube according to claim 1, wherein the coating is a coating or covering with at least one migrating compound, and the migrating compound is one of: (1) a lipophilic compound from the group of a wax, paraffin, fatty acid, or a fat, or (2) a hydrophilic compound from the group of a polyether, polyester, an alcohol with at least one hydroxyl group, ethylene glycol, polyethylene glycol, polypropylene glycol, propanediol, butanediol, pentanediol, hexanediol or glycerine.	As indicated above with respect to claim 1, by the preponderance of the evidence every instance of OMEGA LINER had an inner tubular film, where that inner tubular film had an external layer that faced the resin, and where that external layer included an amount of a migrating compound, specifically EBS wax.
11. The insertion tube according to claim 10, wherein the migrating lipophilic or hydrophilic compound is added to an external side containing a thermoplastic olefin homo- or copolymer or a homo- or copolyamide.	In all instances of OMEGA inner film, the migrating compound was added to an external polyamide layer of the “inner tubular film.” There is no evidence that any OMEGA LINER ever had an inner film that did not meet the limitations of claim 11 with respect to the migrating compound, so by the preponderance of the evidence every instance of OMEGA LINER fell within the literal scope of claim 11.

Based on currently known information, Buergofol contends that Omega has literally infringed claims 1-3 and 5-8 of U.S. Patent No. 8,794,269 ('269 Patent) by making and selling UV-CIPP liners called "OMEGA LINER" that fell within the scope of claims 1-3 and 5-8. Buergofol contends that Omega made instances of OMEGA LINER using amounts of the numerous inner tubular films sold by Buergofol to Omega (inner films of types "Inner 5c" and "Inner 7a" as listed in BF2842-BF2843), and further contends that each of these liners must have entailed and therefore did entail an external film that at least partially blocked UV radiation. As stated above with respect to the '882 Patent, every individual Omega outer (externally situated) film: (i) "The 2021 Sample" (a portion of "The 2021 Sample" was produced to Omega with a letter from D. Wallace to M. Neustel dated 2/6/23 and BF2649), (ii) "The 2022 Sample" (a portion of "The 2022 Sample" was produced to Omega as BF2001 and was mailed on 12/23/22 by US Mail from D. Wallace to M. Neustel), (iii) the numerous outer films sold by Buergofol to Omega (as listed in BF2842-BF2843), (iv) and the numerous "Outer Foil" samples produced by Omega (OMEG-00011 thru OMEG-00016), was colored and at least partially blocked UV radiation. In contrast to this, no evidence has been produced in this case to date indicating that Omega ever made any instance of OMEGA LINER whose outer film did not meet the limitations of claim 1 with respect to the recited "externally situated single- or multilayer tubular film." Accordingly, as it currently stands, by the preponderance of the evidence, every instance of OMEGA LINER included an outer film that met the limitations of claim 1 with respect to the recited "externally situated single- or multilayer tubular film."

Similarly, Buergofol contends that each and every instance of OMEGA LINER that was sold by Omega included resin because without resin the OMEGA LINER would not be usable.

Accordingly, every instance of OMEGA LINER (that was made using an amount of the Buergofol inner film of type "Inner 5c" or "Inner 7a" as listed in BF2842-2843)

fell within the literal scope of claims 1, 3, 5, 6 and 8 of the ‘269 Patent. Buergofol further contends that instances of OMEGA LINER made using inner films of type “Inner 7a” (Buergofol inner film of type “Inner 7a” as listed in BF2842-2843) also fell within the literal scope of claim 2.

Priority Date: The foreign application priority date as listed on the face of the ‘269 Patent is the June 15, 2010 filing date of German application DE102010023764.

Doctrine of Equivalents: By the preponderance of the evidence, every element of a claim of the ‘269 Patent that is literally present in an instance of the OMEGA LINER product (claims 1, 3, 5, 6, and 8 as set forth in the claim chart below) is also present by the doctrine of equivalents using a function/way/result analysis, but Buergofol does not at this time advance the many possible function/way/result arguments and reasons because the claims if properly construed are literally infringed and there is no current need to resort to the doctrine of equivalents. If, however, the Court were to construe one or more of these claims in a way that were to allow OMEGA LINER to be deemed not to fall within the literal scope of the claim because an element is not literally present, then Buergofol will at that time change its contentions and advance an appropriate doctrine-of-equivalents argument directed to the appropriate element of the appropriate claim. Buergofol has not yet, at this point in this litigation, developed the evidence, including expert testimonial evidence, to establish a doctrine-of-equivalents argument directed to any element, and Buergofol answers the interrogatory based on Buergofol’s current knowledge and current contentions. If Buergofol’s contentions in this matter were to change in the future, then Buergofol will update its answer to this contention interrogatory under Fed.R.Civ.P. 26(e) at that time as appropriate

Claim of ‘269 Patent	Where The Element Is Found
1. An insertion tube suitable for the renovation of subterranean pipes, optionally subterranean sewer pipes, comprising	As indicated above to the preponderance of the evidence, each instance of OMEGA LINER that was made using a Buergofol “Inner 5c” or “Inner 7a” inner film was an insertion tube.

an optionally nonconditioned multilayer film that is impermeable to liquids and that is at least to some extent permeable to UV radiation, comprising a layer sequence made of	As indicated above to the preponderance of the evidence, each instance of OMEGA LINER that was made using a Buergofol “Inner 5c” or “Inner 7a” inner film was an insertion tube that had a multilayer internal film, and this internal film (inner film) was impermeable to liquids and was at least partially permeable to UV radiation.
(a) a layer (a) comprised of at least one thermoplastic olefin homo- or copolymer, as one of the external layers,	As indicated above to the preponderance of the evidence, each instance of OMEGA LINER that was made using a Buergofol “Inner 5c” or “Inner 7a” inner film was an insertion tube that had a multilayer internal film, and that inner film had an inner most layer (a) comprising polyethylene (PE).
(b) an adhesive-promoter layer (b),	As indicated above to the preponderance of the evidence, each instance of OMEGA LINER that was made using a Buergofol “Inner 5c” or “Inner 7a” inner film was an insertion tube that had a multilayer internal film, and that inner film had an adhesive-promoter layer (b).
(c) an internally situated layer (c) comprised of at least one homo- and/or copolyamide,	As indicated above to the preponderance of the evidence, each instance of OMEGA LINER that was made using a Buergofol “Inner 5c” or “Inner 7a” inner film was an insertion tube that had a multilayer internal film, and that inner film had an internally situated layer (c) comprising polyamide (PA).
(d) an adhesive-promoter layer (d), and	As indicated above to the preponderance of the evidence, each instance of OMEGA LINER that was made using a Buergofol “Inner 5c” or “Inner 7a” inner film was an insertion tube that had a multilayer internal film, and that inner film had an adhesive-promoter layer (d).
(e) a layer (e) comprised of at least one homo- and/or copolyamide, as one of the external layers,	As indicated above to the preponderance of the evidence, each instance of OMEGA LINER that was made using a Buergofol “Inner 5c” or “Inner 7a” inner film was an insertion tube that had a multilayer internal film, and that inner film had a layer (e) comprising polyamide (PA).
in the form of a tubular film,	The layers (a), (b), (c), (d) and (e) together formed parts of the internal tubular film (inner film) of the insertion tube.
wherein the VICAT softening point of the thermoplastic olefin homo- or copolymer of the layer (a) is at least 100°C;	For all Buergofol inner films (of types “Inner 5c” and “Inner 7a”) the VICAT softening point of the material of layer (a) is known to have been in excess of 100°C.
as an internally situated tube, and	The layers (a), (b), (c), (d) and (e) together are parts of the internal tubular film of the liner.
an externally situated single- or multilayer tubular film which is impermeable to liquids, and which reflects and/or absorbs UV radiation and/or short-wave, visible light, as externally situated tube, and	As indicated above to the preponderance of the evidence, each instance of OMEGA LINER that was made using a Buergofol “Inner 5c” or “Inner 7a” inner film was an insertion tube that had an externally situated tubular film (outer film), and this outer film was impermeable to liquids and also blocked UV radiation.

a support material situated therebetween and saturated with a reactive synthetic resin.	As indicated above to the preponderance of the evidence, each instance of OMEGA LINER that was made using a Buergofol “Inner 5c” or “Inner 7a” inner film was an insertion tube that had a layer of support material situated between the inner film and the outer film, and this support material was saturated with UV curable resin.
2. The insertion tube as claimed in claim 1, wherein the thickness of the layer (a) is at least 40% of the total thickness of the multilayer film that is impermeable to liquids and at least to some extent permeable to UV radiation.	Buergofol contends that each instance of OMEGA LINER that was made using a Buergofol “Inner 7a” inner film was an insertion tube that had a layer (a) that was at least 40% of the total thickness of the inner film.
3. The insertion tube as claimed in claim 1, wherein the layer (a) of the multilayer film that is impermeable to liquids and at least to some extent permeable to UV radiation is comprised of at least one ethylene homo- or copolymer and/or at least one propylene homo- or copolymer.	As indicated above to the preponderance of the evidence, each instance of OMEGA LINER that was made using a Buergofol “Inner 5c” or “Inner 7a” inner film was an insertion tube that had a layer (a) that comprised polyethylene (PE).
5. The insertion tube as claimed in claim 1, wherein the layers (c) and (e) of the multilayer film that is impermeable to liquids and that is at least to some extent permeable to UV radiation have a different layer structure, optionally a different layer thickness, and/or different polyamide components, and/or a different composition.	As indicated above to the preponderance of the evidence, each instance of OMEGA LINER that was made using a Buergofol “Inner 5c” or “Inner 7a” inner film was an insertion tube that had layers (c) and (e), and where each of these layers was impermeable to liquids, was at least to some extent permeable to UV radiation, and had a different layer structure from the other layer.
6. The insertion tube as claimed in claim 1, wherein the adhesive-promoter layers (b) and (d) of the multilayer film that is impermeable to liquids and that is at least to some extent permeable to UV radiation comprise respectively mutually independently at least one modified thermoplastic olefin homo- or copolymer, optionally respectively mutually independently at least one modified thermoplastic ethylene homo- or copolymer and/or at least one modified propylene homo- or copolymer.	As indicated above to the preponderance of the evidence, each instance of OMEGA LINER that was made using a Buergofol “Inner 5c” or “Inner 7a” inner film was an insertion tube that had adhesive-promoter layers (b) and (d), and where each of these layers was impermeable to liquids, and was at least to some extent permeable to UV radiation, and comprised an amount of a modified thermoplastic olefin LLDPE.
7. The insertion tube as claimed in claim 1, wherein the multilayer film that is impermeable to liquids and that is at least to some extent permeable to UV radiation consists of the layers (a)-(e).	Buergofol contends that each instance of OMEGA LINER that was made using a Buergofol “Inner 5c” inner film as mentioned above with respect to claim 1 had an “internally situated tube”, and this “internally situated tube” consisted of the five layers (a)-(e).
8. The insertion tube as claimed in claim 1, wherein the multilayer film that is impermeable to liquids and that is at least to some extent permeable to UV radiation is permeable to an extent of at least 80% to UV radiation.	As indicated above to the preponderance of the evidence, each instance of OMEGA LINER that was made using a Buergofol “Inner 5c” or “Inner 7a” inner film was an insertion tube that had a multilayer “internally situated tube”, and this multilayer film was impermeable to liquids, and this multilayer film at least to some extent was permeable to UV radiation in that 80% of UV radiation passed through it.

Dated this 24th day of April, 2023

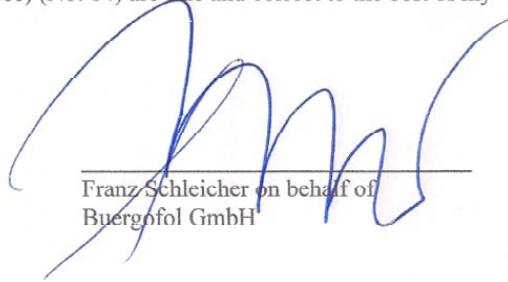
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VERIFICATION

I, Franz Schleicher, have the title of Alleinprokurist (sole officer with general commercial power of representation) of Buergofol GmbH. I declare under penalty of perjury that the facts stated in the foregoing Buergofol's Responses to Omega's Interrogatories to Buergofol (Set Three) (No. 14) are true and correct to the best of my knowledge, information, and belief.



Franz Schleicher on behalf of
Buergofol GmbH

CERTIFICATE OF SERVICE

The undersigned certifies that, on the date indicated above, a true and correct copy of the foregoing document was served electronically using the CM/ECF system or email:

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