IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CEREBRUM SENSOR TECHNOLOGIES, INC. and TIRE STICKERS LLC,	)	
Plaintiffs,	)	
v.	)	C.A. No. 24-245 (JLH) (SRF)
REVVO TECHNOLOGIES, INC.,	)	
Defendant.	)	

SCHEDULING ORDER

This 13th day of September, 2024, the Court having issued an Oral Order in lieu of holding an initial Rule 16 scheduling and planning conference pursuant to Fed. R. Civ. P. 16(b) and Local Rule 16.1(b), and the parties having determined after discussion that the matter cannot be resolved at this juncture by settlement, voluntary mediation, or binding arbitration; IT IS ORDERED that:

1. **Joinder of Other Parties and Amendment of Pleadings**. All motions to join other parties, and to amend or supplement the pleadings shall be filed on or before March 28, 2025.

2. **Discovery.**[1] All fact discovery in this case shall be initiated so that it will be completed on or before December 19, 2025. All expert discovery in this case shall be initiated so that it will be completed on or before April 17, 2026. Unless otherwise ordered by the Court, the limitations on discovery set forth in Local Rule 26.1 shall be strictly observed.

[1] Should the parties agree to modify the number of depositions under FED. R. CIV. P. 30, the number of allowed interrogatories under Rule 33 or limit the number of requests for production and/or requests for admission under Rules 34 and 36 respectively, they shall include the appropriate proposed provisions in this Order.

a. Rule 26(a)(1) Initial Disclosures. Unless otherwise agreed to by the parties, the parties shall make their initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) within ten (10) days of the date of this Order.

b. E-Discovery Default Standard. If they have not already done so, the parties are to review the Default Standard for Discovery of Electronic Documents, which is posted on Magistrate Judge Fallon's section of the Court's website (http://www.ded.uscourts.gov) under the "Guidelines" tab, and is incorporated herein by reference.

c. Document Production. Document production shall be substantially complete on or before August 29, 2025.

d. Interrogatories. A maximum of 25 interrogatories shall be served by each party to any other party.

e. Contention Interrogatories. Except as set forth below, in the absence of agreement among the parties, contention interrogatories, if filed, shall first be addressed by the party with the burden of proof no later than the date established for the completion of document production, with the responsive answers due within thirty (30) days thereof. The adequacy of all such interrogatory answers shall be judged by the level of detail each party provides; i.e., the more detail a party provides, the more detail a party shall receive.

i. Infringement and Invalidity Contentions.

(1) Initial Contentions. By October 30, 2024, Plaintiff shall produce an initial claim chart relating each known accused product to the asserted claims each such product allegedly infringes. By November 27, 2024, Defendant shall produce its initial invalidity contentions for each asserted claim, as well as the known related invalidating references. To facilitate the above initial contentions, (i) by September 18, 2024, Plaintiff shall identify the

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accused product(s), including accused methods and systems, as well as the asserted patent(s) that the accused product(s) allegedly infringe(s), and plaintiff shall also produce the file history for each asserted patent; and (ii) by the close of business on October 4, 2024, Defendant shall produce, in searchable format with a load file, core technical documents, such as manufacturing documents, operation manuals, product literature, schematics, and/or specifications, sufficient to describe how the accused product(s) are manufactured, sufficient to describe the accused product(s), and sufficient to show how the accused product(s) work(s) subject to Fed. R. Civ. 26.

a. Case Narrowing – Initial Contentions. Initial Contentions should not be narrowed before substantial discovery is completed.

(2) Final Contentions. By October 24, 2025, Plaintiff shall provide final infringement contentions. By November 21, 2025, Defendant shall provide final invalidity contentions.

a. Case Narrowing – Final Contentions. In the Final Infringement Contentions, Plaintiff shall assert no more than 18 total asserted claims. In the Final Invalidity Contentions, Defendant shall assert no more than 18 total prior art theories, where each "theory" refers to a single invalidity theory (i.e., anticipation or a specific obviousness combination with no "and/or" alternatives as part of the combination), and no more than two (2) non-prior art invalidity theories per asserted claim, absent leave of court.

f. Requests for Admission. A maximum of 50 requests for admission shall be served by each party to any other party, except for requests for admission of the admissibility of evidence under the Federal Rules of Evidence.

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g. Depositions.

i. Timing. In the absence of agreement among the parties or by order of the court, no deposition (other than those noticed under Fed. R. Civ. P. 30(b)(6)) shall be scheduled prior to the completion of document production.

ii. Limitation on Hours for Deposition Discovery. Each side is limited to a maximum of 49 hours for taking fact depositions of the other side (exclusive of third-party depositions which shall not count toward this hours limitation).

iii. Location of Depositions. Any party or representative (officer, director, or managing agent) of a party filing a civil action in this district court must ordinarily be required, upon request, to submit to a deposition at a place designated within this district. Exceptions to this general rule may be made by order of the Court. A defendant who becomes a counterclaimant, cross-claimant, or third-party plaintiff shall be considered as having filed an action in this Court for the purpose of this provision.

h. Disclosure of Expert Testimony.

i. For the party who has the initial burden of proof on the subject matter, the initial Federal Rule 26(a)(2) disclosure of expert testimony is due on or before January 23, 2026.

ii. The supplemental disclosure to contradict or rebut evidence on the same matter identified by another party is due on or before February 20, 2026.

iii. Reply expert reports from the party with the initial burden of proof are due on or before March 13, 2026.

iv. No other expert reports will be permitted without either the consent of all parties or leave of the Court. Along with the submissions of the expert reports, the parties

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shall advise of the dates and times of their experts' availability for deposition. Expert discovery shall close by April 17, 2026.

i. Objections to Expert Testimony. To the extent any objection to expert testimony is made pursuant to the principles announced in *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993), as incorporated in Federal Rule of Evidence 702, it shall be made by motion no later than the deadline for dispositive motions set forth herein, unless otherwise ordered by the Court. Briefing on such motions is subject to the page limits set out in connection with briefing of case dispositive motions.

j. Fact Witnesses to be Called at Trial.

i. Within one (1) month following the close of expert discovery, each party shall serve on the other parties a list of each fact witness (including any expert witness who is also expected to give fact testimony), who has previously been disclosed during discovery and that it intends to call at trial.

ii. Within one (1) month of receipt of such fact witness list, each party shall serve a list of each rebuttal fact witness that it intends to call at trial.

iii. The parties shall have the right to depose any such fact witnesses who have not previously been deposed in this case. Such deposition shall be held within one (1) month after service of the list of rebuttal fact witnesses and shall be limited to twenty (20) hours per side in the aggregate unless extended by agreement of the parties or upon order of the court upon good cause shown.

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k. Discovery Matters and Disputes Relating to Protective Orders.

i. Should counsel find they are unable to resolve a discovery matter or those other matters covered by this paragraph,[2] the moving party (*i.e.*, the party seeking relief from the Court) shall file a "[Joint] Motion for Teleconference To Resolve [Protective Order or Discovery] Dispute." The suggested text for this motion can be found in Magistrate Judge Fallon's section of the Court's website in the "Forms" tab, under the heading "Discovery Matters–Motion to Resolve Discovery Disputes."

ii. The Court will thereafter order a discovery telephone conference and deadlines for submissions. On the date set by the Court, generally not less than seventy-two (72) hours prior to the conference, excluding weekends and holidays, the party seeking relief shall file with the Court a letter, not to exceed four (4) pages, in no less than 12-point font, outlining the issues in dispute and its position on those issues. This submission shall include a proposed order, attached as an exhibit, setting out the nature of the relief requested. The parties shall file any exhibits associated with their respective letter submissions as separate, individual attachments within the docket entry for the letter.

iii. On the date set by the Court, generally not less than forty-eight (48) hours prior to the conference, excluding weekends and holidays, any party opposing the application for relief may file a letter, not to exceed four (4) pages, in no less than 12-point font, outlining that party's reason for its opposition.

iv. Two (2) courtesy copies of the letters are to be hand delivered to the Clerk's Office within one hour of e-filing. All courtesy copies shall be double-sided.

[2] Counsel are expected to ***verbally*** discuss the issues/concerns before seeking the Court's intervention.

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v. Should the Court find further briefing necessary upon conclusion of the telephone conference, the Court will order it.

vi. Disputes or issues regarding protective orders, or motions for extension of time for briefing case dispositive motions which are related to discovery matters are to be addressed in accordance with this paragraph.

3. **Application to Court for Protective Order**. The Court has already entered a Stipulated Protective Order in this case (D.I. 18). Should counsel find it will be necessary to apply to the Court for a modified protective order specifying different terms and conditions for the disclosure of confidential information, counsel should confer and attempt to reach an agreement on a modified proposed form of order and submit it to the Court. Should counsel be unable to reach an agreement on a proposed form of protective order, counsel must follow the provisions of Paragraph 2(j) above.

Any proposed protective order should include the following paragraph:

> Other Proceedings. By entering this order and limiting the disclosure of information in this litigation, the Court does not intend to preclude another court from finding that information may be relevant and subject to disclosure in another case. Any person or party subject to this order who in other proceedings becomes subject to a motion to disclose another party's information designated "confidential" [the parties should list any other level of designation, such as "highly confidential," which may be provided for in the protective order] pursuant to this order shall promptly notify that party of the motion so that party may have an opportunity to appear and be heard in the other proceeding.

4. **Papers Filed Under Seal**. When filing papers under seal, counsel should deliver to the Clerk an original and one (1) copy of the papers. In accordance with section G of the Administrative Procedures Governing Filing and Service by Electronic Means, a redacted version of any sealed document shall be filed electronically within seven (7) days of the filing of the sealed document.

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5. **Courtesy Copies**. The parties shall provide to the Court two (2) courtesy copies of all briefs and one (1) courtesy copy of any other document filed in support of any briefs (i.e., appendices, exhibits, declarations, affidavits, etc.). This provision also applies to papers filed under seal.

6. **Interim Status Report**. On June 27, 2025, counsel shall submit a joint interim report to the Court on the nature of the matters in issue and the progress of discovery to date.

7. **Status Conference**. On July 9, 2025, the Court will hold a Rule 16(a), (b) and (c) conference by telephone with counsel beginning at 2:00 P.M. Plaintiff's counsel shall initiate the telephone call. At the time of this conference, counsel shall also be prepared to discuss the progress, if any, of settlement discussions and shall be prepared to discuss the possibility of setting up a settlement conference with the Court, counsel and their clients. If all parties agree that there is nothing to report, nor anything to add to the interim status report or to this order, they shall notify the Court in writing before the conference is scheduled to occur, and the conference will be taken off of the Court's calendar.

8. **Claim Construction Issue Identification**. On or before December 6, 2024, the parties shall exchange a list of those claim term(s)/phrase(s) that they believe need construction. On or before December 20, 2024, the parties shall exchange a list of their proposed claim construction of those term(s)/phrase(s) and disclose all intrinsic and extrinsic evidence in support thereof for each term/phrase. This document will not be filed with the Court. To the extent that a party intends to rely on extrinsic evidence in the form of expert testimony (i.e., an expert declaration) to support any proposed claim construction, the party shall identify such intention to rely on such expert testimony in conjunction with the disclosure of a proposed claim construction but need not serve a copy of any such expert testimony until that party's first-served claim

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construction brief. Subsequent to exchanging that list, the parties will meet and confer to prepare a Joint Claim Construction Chart to be filed no later than January 10, 2025. The parties' Joint Claim Construction Chart should identify for the Court the term(s)/phrase(s) of the claim(s) in issue, and should include each party's proposed construction of the disputed claim language with citation(s) only to the intrinsic evidence in support of their respective proposed constructions. A copy of the patent(s) in issue as well as those portions of the intrinsic record relied upon shall be submitted with this Joint Claim Construction Chart. In this joint submission, the parties shall not provide argument. Each party shall file concurrently with the Joint Claim Construction Chart a "Motion for Claim Construction" that requests the Court to adopt the claim construction position(s) of that party set forth in the Joint Claim Construction Chart. The motion shall not contain any argument and shall simply state that the party "requests" that the Court adopt the claim construction position(s) of [the party] set forth in the Joint Claim Construction Chart (D.I. [ ])."

9. **Claim Construction Briefing**. The Plaintiff shall serve, but not file, its opening brief, not to exceed 20 pages, on February 19, 2025. The Defendant shall serve, but not file, its answering brief, not to exceed 30 pages, on March 19, 2025. The Plaintiff shall serve, but not file, its reply brief, not to exceed 20 pages, on April 9, 2025. The Defendant shall serve, but not file, its sur-reply brief, not to exceed 10 pages, on April 30, 2025. No later than May 7, 2025, the parties shall file a Joint Claim Construction Brief. The parties shall copy and paste their unfiled briefs into one brief, with their positions on each claim term in sequential order, in substantially the form below.

JOINT CLAIM CONSTRUCTION BRIEF

I. Agreed-upon Constructions

II. Disputed Constructions

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A. [TERM 1]

1. Plaintiff's Opening Position

2. Defendant's Answering Position

3. Plaintiff's Reply Position

4. Defendant's Sur-Reply Position

B. [TERM 2]

1. Plaintiff's Opening Position

2. Defendant's Answering Position

3. Plaintiff's Reply Position

4. Defendant's Sur-Reply Position

The parties need not include any general summaries of the law relating to claim construction. If there are any materials that would be submitted in an appendix, the parties shall submit them in a Joint Appendix.

10. Beginning at 11 a.m. on June 25, 2025, the Court will hear evidence and argument on claim construction. The parties shall notify the Court, by joint letter submission, no later than the date on which the Joint Claim Construction Brief is due: (i) whether they request leave to present testimony at the hearing; and (ii) the amount of time they would like to have allocated to them for the hearing.

11. The court shall issue its decision on claim construction on or before August 29, 2025.

12. Case Dispositive Motions.

All case dispositive motions, an opening brief, and affidavits, if any, in support of the motion shall be served and filed on or before May 16, 2026 [calculated so that briefing is

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completed approximately four months prior to the pretrial conference]. Answering briefs will be due by June 16, 2026, and reply briefs will be due by June 30, 2026. No case dispositive motion under Rule 56 may be filed more than ten days before the above date without leave of the Court.

a. Concise Statement of Facts Requirement. Any motion for summary judgment shall be accompanied by a separate concise statement, not to exceed six pages, which details each material fact that the moving party contends is essential for the Court's resolution of the summary judgment motion (not the entire case) and as to which the moving party contends there is no genuine issue to be tried. Each fact shall be set forth in a separate numbered paragraph and shall be supported by specific citation(s) to the record.

Any party opposing the motion shall include with its opposing papers a response to the moving party's concise statement, not to exceed six pages, which admits or disputes the facts set forth in the moving party's concise statement on a paragraph-by-paragraph basis. To the extent a fact is disputed, the basis of the dispute shall be supported by specific citation(s) to the record. Failure to respond to a fact presented in the moving party's concise statement of facts shall indicate that fact is not in dispute for purposes of summary judgment. The party opposing the motion may also include with its opposing papers a separate concise statement, not to exceed four pages, which sets forth material facts as to which the opposing party contends there is a genuine issue to be tried. Each fact asserted by the opposing party shall also be set forth in a separate numbered paragraph and shall be supported by specific citation(s) to the record.

b. The moving party shall include with its reply papers a response to the opposing party's concise statement of facts, not to exceed four pages, on a paragraph-by-paragraph basis.

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c. Page limits combined with *Daubert* motion page limits. Each party is permitted to file as many case dispositive motions as desired, provided, however, that each side will be limited to a combined total of 40 pages for all opening briefs, a combined total of 40 pages for all answering briefs, and a combined total of 20 pages for all reply briefs. In the event that a party files, in addition to a case dispositive motion, a *Daubert* motion to exclude or preclude all or any portion of an expert's testimony, the total amount of pages permitted for all case dispositive and *Daubert* motions shall be increased to 50 pages for all opening briefs, 50 pages for all answering briefs, and 25 pages for all reply briefs for each *side*.[3]

d. Hearing. The Court will hear argument on all pending case dispositive and *Daubert* motions on TBD. [a date approximately two months prior to the requested pretrial conference date]. Unless otherwise ordered by the Court, each side will be allocated a total of forty-five minutes to present its argument on all pending motions.

13. Applications by Motion. Except as otherwise specified herein, any application to the Court shall be by written motion. Any non-dispositive motion should contain the statement required by Local Rule 7.1.1.

14. Amendments to the Scheduling Order. Any stipulation or other request to amend the scheduling order shall include a chart that lists each court-ordered event with a deadline/date (even if it is not being changed), the current deadline/date, and the new proposed deadline/date.

15. IPRs/PGRs. Any party asserting a patent must file a "Notice of IPR/PGR Event" within seven days of any of the following actions taken on that patent: petition for inter partes

[3] The parties must work together to ensure that the Court receives no more than a *total* of 250 pages (*i.e.*, 50 + 50 + 25 regarding one side's motions, and 50 + 50 + 25 regarding the other side's motions) of briefing on all case dispositive motions and *Daubert* motions that are covered by this scheduling order and any other scheduling order entered in any related case that is proceeding on a consolidated or coordinated pretrial schedule.

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review/post grant review (regardless of whether a party filed the petition), institution decision, final written decision, appeal to the Federal Circuit, Federal Circuit decision. The Notice must list the action taken, the affected claims, the dates of any expected further action by the PTAB, and the status of all other pending IPRs/PGRs.

16. Motions *in Limine*. Motions *in limine* shall not be separately filed. All *in limine* requests and responses thereto shall be set forth in the proposed pretrial order. Each side shall be limited to three *in limine* requests, unless otherwise permitted by the Court. The *in limine* request and any response shall contain the authorities relied upon. Each *in limine* request may be supported by a maximum of three pages of argument, may be opposed by a maximum of three pages of argument, and the side making the *in limine* request may add a maximum of one additional page in reply in support of its request. If more than one party is supporting or opposing an *in limine* request, such support or opposition shall be combined in a single three-page submission (and, if the moving party, a single one page reply), unless otherwise ordered by the Court. No separate briefing shall be submitted on *in limine* requests, unless otherwise permitted by the Court.

17. Pretrial Conference. On TBD, the Court will hold a pretrial conference in Court with counsel. Unless otherwise ordered by the Court, the parties should assume that filing the pretrial order satisfies the pretrial disclosure requirement of Federal Rule of Civil Procedure 26(a)(3). The parties shall file with the Court the joint proposed final pretrial order in compliance with Local Rule 16.3(c) not later than seven days before the pretrial conference. Unless otherwise ordered by the Court or agreed by the parties, the parties shall comply with the timeframes set forth in Local Rule 16.3(d)(1)-(3) for the preparation of the joint proposed final pretrial order.

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The proposed final pretrial order shall contain a table of contents. The parties shall provide the Court two double-sided courtesy copies of the joint proposed final pretrial order and all attachments.

18. Jury Instructions, Voir Dire, and Special Verdict Forms. Where a case is to be tried to a jury, pursuant to Local Rules 47.1(a)(2) and 51.1, the parties should file (i) proposed voir dire, (ii) preliminary jury instructions, (iii) final jury instructions, and (iv) special verdict forms seven days before the final pretrial conference. This submission shall be accompanied by a courtesy copy containing electronic files of these documents in Microsoft Word format, which should be submitted by e-mail to jlh_civil@ded.uscourts.gov.

19. Trial. This matter is scheduled for a five (5)[4] day [jury/bench] trial beginning at 9:30 a.m. on TBD with the subsequent trial days beginning at 9:00 a.m. Until the case is submitted to the jury for deliberations, the jury will be excused each day at 5:00 p.m. The trial will be timed, and counsel will be allocated a total number of hours in which to present their respective cases.

20. Judgment on Verdict and Post-Trial Status Report. Within seven days after a jury returns a verdict in any portion of a jury trial, the parties shall jointly submit a form of order to enter judgment on the verdict. At the same time, the parties shall submit a joint status report, indicating among other things how the case should proceed and listing any post-trial motions each party intends to file.

21. Post-Trial Motions. Unless otherwise ordered by the Court, all sides are limited to a maximum of 20 pages of opening briefs, 20 pages of answering briefs, and 10 pages of reply

[4] Five days (*i.e.*, about ten to thirteen hours per side) is the presumptive length of a patent jury trial. If the parties think it is obvious that this will not be enough, they may put in a different length and should be prepared to explain why at the Rule 16 conference. A final decision on the precise length of trial will not be made before the final pretrial conference.

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briefs relating to any post-trial motions filed by that side, no matter how many such motions are filed.

A Proposed Chart of All Relevant Deadlines is provided in **Appendix A**.

UNITED STATES MAGISTRATE JUDGE

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Appendix A
Chart of All Relevant Deadlines

EVENT	DEADLINE
26(a)(1) disclosures	Within 10 business days after entry of Scheduling Order
Identification of accused product(s)	September 18, 2024
Production of core technical documents and representative samples in searchable format with a load file	October 4, 2024 by the close of business
Initial infringement contentions	October 30, 2024
Initial invalidity contentions	November 27, 2024
Parties exchange identification of disputed terms for construction	December 6, 2024
Parties exchange proposed constructions for disputed terms and identification of intrinsic and extrinsic evidence in support thereof	December 20, 2024
Parties file joint claim construction chart	January 10, 2025
Plaintiff serves opening claim construction brief and any expert declaration in support thereof	February 19, 2025
Deposition of Plaintiff's claim construction expert	March 7, 2025
Defendant serves answering claim construction brief and any expert declaration in support thereof	March 19, 2025
Deposition of Defendant's claim construction expert	April 4, 2025
Substantial completion of document production	August 29, 2025
Plaintiff serves reply claim construction brief	April 9, 2025
Defendant serves sur-reply claim construction brief	April 30, 2025
Parties file joint claim construction brief	May 7, 2025
Joinder of Parties and Amendment of Pleadings	March 28, 2025

EVENT	DEADLINE
Parties to meet and confer and file amended joint claim construction chart (if necessary)	June 11, 2025
Interim Status Report	June 27, 2025
Claim construction hearing	June 25, 2025 at 11:00 a.m.
Final infringement contentions	October 24, 2025
Final invalidity contentions	November 21, 2025
Close of fact discovery	December 19, 2025
Opening expert reports on issues for which the party bears the burden of proof	January 23, 2026
Rebuttal expert reports	February 20, 2026
Reply expert reports	March 13, 2026
Close of expert discovery	April 17, 2026
Dispositive/*Daubert* Motions	May 16, 2026
Answering Briefs to Dispositive/*Daubert* Motions	June 16, 2026
Replies in support of Dispositive/*Daubert* Motions	June 30, 2026
Hearing on Dispositive/*Daubert* Motions	TBD
Pretrial Order, Jury instructions, Voir Dire and Verdict form	[7 days before Pretrial Conference]
Pretrial Conference	TBD
Trial	TBD

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Anderson, Rohlin D.

From: Bright, Christopher
Sent: Monday, September 23, 2024 10:05 AM
To: DOCKET_OC; DR_COMLIT_OC
Cc: Franich, Christopher; Povinelli, Morgan
Subject: FW: Activity in Case 1:24-cv-00245-JLH-SRF Cerebrum Sensor Technologies, Inc. et al v. Revvo Technologies, Inc. Oral Order

Please docket. This is an electronic scheduling order (no document attached).

Chris Bright

O: 714.427.7069
cbright@swlaw.com

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Plaza Tower | 600 Anton Boulevard | Suite 1400 | Costa Mesa, CA 92626-7689

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Subject: Activity in Case 1:24-cv-00245-JLH-SRF Cerebrum Sensor Technologies, Inc. et al v. Revvo Technologies, Inc. Oral Order

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U.S. District Court

District of Delaware

Notice of Electronic Filing

The following transaction was entered on 9/23/2024 at 11:15 AM EDT and filed on 9/23/2024
Case Name: Cerebrum Sensor Technologies, Inc. et al v. Revvo Technologies, Inc.

Case Number: 1:24-cv-00245-JLH-SRF
Filer:
Document Number: 42(No document attached)

Docket Text:
ORAL ORDER- re [38] Scheduling Order. IT IS ORDERED that the following dates are scheduled before Judge Hall: (1) A hearing on case dispositive and *Daubert* motions is set for July 29, 2026 at 10:00 AM. (2) The pretrial conference is set for November 9, 2026 at 2:00 PM. (3) A 5-day jury trial is set to begin on November 16, 2026 at 9:30 AM, with subsequent trial days beginning at 9:00 AM. Ordered by Judge Sherry R. Fallon on 9/23/2024. (lih)

1:24-cv-00245-JLH-SRF Notice has been electronically mailed to:

Karen Jacobs kjacobs@mnat.com, kjlefiling@mnat.com, mnat_IP_eFiling@morrisnichols.com

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1:24-cv-00245-JLH-SRF Filer will deliver document by other means to:

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