UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD., Petitioner,	:	
v.	:	IPR2016-01376
GODO KAISHA IP BRIDGE 1, Patent Owner.	:	Patent No. 6,197,696

The telephonic conference in the above-entitled matter convened at 2:02 p.m. on Wednesday, November 16, 2016, and the proceedings being taken down by stenotype and transcribed by Catherine B. Crump, a Notary Public in and for the District of Columbia.

BEFORE:

HON. JENNIFER CHAGNON

HON. JUSTIN ARBES

HON. MICHAEL FITZPATRICK

Patent Trial and Appeal Board Judges

APPEARANCES:

On behalf of Petitioner:

DARREN M. JIRON, ESQ.

J. PRESTON LONG, ESQ.

JOSHUA GOLDBERG, ESQ.

Finnegan, Henderson, Farabow, Garrett & Dunner, LLP

901 New York Avenue, N.W.

Washington, D.C. 20001

(202) 408-4000

On behalf of Patent Owner:

J. STEVEN BAUGHMAN, ESQ.

ANDREW N. THOMASES, ESQ.

JORDAN ROSSEN, ESQ.

Ropes & Gray, LLP

2099 Pennsylvania Avenue, N.W.

Washington, D.C. 20006

(202) 508-4606

P R O C E E D I N G S

JUDGE CHAGNON: Good afternoon. This is Judge Chagnon. I also have Judges Arbes and Fitzpatrick on the line with me today.

This a conference call for IPR 2016-01376, 01377, 01378, and 01379.

I just want to check whether we have someone from both parties on the line today. Who do we have for Petitioner?

MR. JIRON: Hi, Your Honor. This is Darren Jiron. I'm with the law firm of Finnegan, representing TSMC, the Petitioner, and with me today are my colleagues, J.P. Long and Josh Goldberg.

MR. BAUGHMAN: Hi, Your Honor. For Patent Owner, it's Steve Baughman from Ropes & Gray, and my colleagues Andrew Thomases and Jordan Rossen are on the line.

JUDGE CHAGNON: Thank you, and do we have a court reporter on the line?

COURT REPORTER: Yes. My name is Catherine Crump.

JUDGE CHAGNON: All right. So I'll just ask

whichever party requested the court reporter to be on line today to just go ahead and file the transcript as an exhibit after the call.

MR. JIRON: We will, Your Honor. Thank you.

JUDGE CHAGNON: Thank you. I'm sorry. Who was that?

MR. JIRON: That was Darren Jiron for Petitioner.

JUDGE CHAGNON: Thank you so much.

All right. So I believe Petitioner requested this call today. So we'll hear from Petitioner first.

MR. JIRON: Thank you, Your Honor. This is Darren Jiron and we requested the call and thank you for accommodating the call today.

There were two issues that we wanted to address. The first one related to a request for leave to file a motion to correct a typographical error in an exhibit, and the second was a motion for leave to file a reply to the Patent Owner Preliminary Response.

If it would be okay with Your Honor, I could

proceed with the typographical error issue first.

JUDGE CHAGNON: Okay. That works.

MR. JIRON: Okay. So the typographical error that occurred is in Exhibit 1002 and that appeared in the same numbered exhibit in each one of the four IPR proceedings.

Specifically, the typographical error is in Appendix B of Exhibit 1002, and Appendix B starts at page 126 of the PDF for Exhibit 1002. Specifically on page B-10 of Appendix B, there was a sentence that appears in the middle of the cell of the claim chart, and the sentence currently reads:

"A person of ordinary skill in the art would have understood that Etching Layer 12 under such circumstances concurrently etches Layer 58, because the two layers have similar etched properties."

And the typographical error that occurred in this sentence was with the number 58. Specifically, No. 58 should have been No. 62 to refer to the appropriate layer that was being addressed.

As evidence that it was a typographical error, one could look to other areas of the same

cell. For example, the last sentence of the cell indicates that the two layers being addressed as being concurrently etched are Photoresist Layer 62 and Dielectric Layer 12. That was the ultimate conclusion of this section of the claim chart and it was clearly talking about Layers 62 and 12.

Additionally, in the second to the last paragraph, it's talking about, again, the layers of the etch as being Layer 62 and Layer 12. If you look back on page B-9, there was actually -- in the language of the claim itself, it refers to the two layers that were supposed to be concurrently etched as being the second dielectric area and the second layer of resist, and to make it clear which layers are being discussed, the expert has color coding on the claim language.

The second dielectric layer appears in blue and that matches up with Layer 12, and the second layer of resist, the layer that was being concurrently etched, that has been designated as pink in the claim language, and that matches up with Layer 62, the pink layer.

So given those indications, there's ample support to show that when the expert said Layer 58 in the third to the last paragraph on page B-10, he actually intended to say Layer 62 to be consistent with the rest of the patent.

JUDGE CHAGNON: Okay. Thank you.

We'll stay on this issue, and I believe in the E-mail, Patent Owner also said they opposed this request. So we'll hear from Patent Owner on this issue before we move on.

MR. BAUGHMAN: Thanks, Your Honor. It's Steve Baughman for Patent Owner.

Respectfully, we don't agree, as the Petitioner argued in its E-mail, that changing this testimony to refer to a different layering grill, 62 instead of 58, is merely a typographical error indicated by the document itself, and to begin with, I think it's helpful to bear in mind what the Petitioner is arguing about, and I think maybe the path that it took us to get to this page is illustrative of this.

This is not, actually, an argument in the

petition or even an argument in the body of the declaration of Petitioner's Dr. Smith. It's a line in this appendix claim chart to a declaration that's incorporated by reference into the petition without any substantive discussion.

So they're asking permission on this call to modify an opinion that affects no argument that's actually stated in the petition, and we pointed that out in our Patent Owner Preliminary Response.

We've also actually briefed the particular argument that is in the middle of the cell that counsel was speaking of here. There is certainly mention of Photoresist Layer 62 in this cell, and I would point out that every time Dr. Smith talks about that Layer 62, he calls it Photoresist Layer 62.

So it's not a mere substitution of numbers here. It's an intermediate argument about composition of layers. If you look elsewhere in the chart, there are other places where the composition of Layer 58 is discussed as well. It's not a random number, but one of the elements of the figures, one of the layers discussed in this cell.

It's repeated in all four declarations that Dr. Smith signed. So allowing this change of numbers would substantively alter the layers we're talking about and it would alter the briefing we've already submitted about this argument about composition.

Respectfully, we also don't see any support in the provisional application for arguing that Layer 62 has the similar etched property that's referred to in this paragraph that talks about Layer 58. There's, of course, no citation at the end of that paragraph to begin with.

So we don't agree that this is merely a typo that wouldn't alter the substantive course of the briefing to date. Again, we've briefed -- if you look at our Patent Owner preliminary response in the 1376 matter, for example, Paper 6 at pages 28 to 30, we've talked about this argument as they made it.

If they were permitted to change the basis of their petition on this ground, we would certainly need an opportunity to analyze and consider possible expert testimony about it and file an additional response to this portion of their argument, but

that's really not appropriate here. It would be prejudicial to ask us to do that at this point in the proceeding, especially while the clock is ticking on institution decisions here.

IP Bridge and our experts and counsel are actively engaged in the other board matters and litigation matters. They waited a couple of weeks here, more than two weeks, to raise this issue after, I suppose, reading about it in our Patent Owner Preliminary Response before even asking to have a meet and confer.

Respectfully, it would be prejudicial to make this change which is certainly not merely typographical.

JUDGE CHAGNON: Okay. Thank you.

Petitioner, do you have anything else to add on this point?

MR. JIRON: Sure, Your Honor.

One of the points was that the chart was somehow incorporated by reference, and that's simply not the case. There was no incorporation by reference to the chart. In fact, this whole chart

was really proffered as a demonstration that evidence exists that the cited prior art would be entitled to an earlier priority date if needed to show in such a case that the Patent Owner would raise an affirmative defense-type argument if it was, actually, not something that the Petitioner was relying upon at all and it wasn't incorporated by reference.

And the next argument that counsel put forward was that it was something that counsel had grieved and that it would be prejudicial to allow Petitioner to correct the error. The fact that Patent Owner grieved the issue actually is a bit -- relying upon that as a reason not to allow the change is a little bit odd given the fact that the Patent Owner selected that issue to grieve despite the fact that there are numerous other references even in that same cell itself that are sufficient to show that the layers being addressed are 62 and 12.

I mean, I would suggest that even without a correction of the typographic error, the rest of the cell makes it perfectly clear that the patent expert or the technical expert was clearly talking about

Layers 62 and 12, and there would be sufficient support in the rest of the cell alone to demonstrate that fact even without the correction. The correction is really just for purposes of making everything consistent with one another, not -- it wouldn't be prejudicial to Patent Owner at all.

JUDGE CHAGNON: Just to be clear, the relief that you're requesting, are you requesting authorization to go ahead and correct it or are you requesting authorization to file a motion to correct it?

MR. JIRON: Right. Well, according to Rule 104(C), it would -- we could ask for a motion to make the correction and we would be happy to do that. On the other hand, we think that it is of the type of typographical error that the board has taken the conference call as, basically, a request to correct the typographical error as sufficient, and that would be, we would think, the simplest thing to do in this matter.

JUDGE CHAGNON: Okay. Great. I just wanted to make sure everybody was on the same page.

Just procedurally today, we're going to hear from the parties on all of these issues, and then we're not going to make decisions on the call today. We're just going to take everything under advisement and issue an order, likely, in the next day or so.

MR. BAUGHMAN: Your Honor, I'm sorry. Steve Baughman for Patent Owner.

Just before we move off of this issue, may I just offer a citation to show where it's incorporated by reference? I would like to respond to that one point.

JUDGE CHAGNON: Okay. Go ahead.

MR. BAUGHMAN: On page 29 of the petition in Footnote 3, the Petitioner refers to Exhibit 1002, paragraph 153. Paragraph 153 is in Dr. Smith's declaration which points back to this claim chart in its entirety.

That's where we submit it's incorporated by reference.

Thank you, Your Honor.

JUDGE CHAGNON: Thank you.

So if we've heard everything for both parties

on this issue, we can move on to the other question about the reply briefing that's being requested.

MR. JIRON: Thank you, Your Honor. This is Darren Jiron for Petitioner again.

So on this issue, the Petitioner is requesting leave to file a reply under Rule 108(C), and we believe there's good cause to request the reply, basically, to address a case of burden shifting that has occurred in Patent Owner's Preliminary Response.

So in this particular situation, the arguments that the Patent Owner raised in its preliminary response actually are contrary to the burden framework that is set up by the applicable law, specifically, the guidance provided by the Federal Circuit case Dynamic Drinkware.

The Petitioner would like an opportunity to further address in a reply the specific burden shifting arguments that Patent Owner has raised that go against the burden framework that's laid out in Dynamic Drinkware.

So, for example, in the petition, the

Petitioner cited prior art, a document referred to as "grill" and established according to the Dynamic Drinkware burden that the grill qualifies as prior art under Section 102(E), in the Patent Owner Preliminary Response. Rather than actually disputing that the grill qualifies as prior art under 102(E), the Patent Owner took a different tact and argued that Petitioner had failed to show the grill as prior art and not because it doesn't qualify according to its date, but, rather, because it alleged that the Petitioner had made a failure and the failure that the Patent Owner alleged had been committed was Petitioner not demonstrating that the 696 patent, the one at issue here, was not entitled to the benefit of foreign priority based on a Japanese document called the 371 Application.

So, basically, rather than the Patent Owner following Dynamic Drinkware burden framework that's set up that says that once the petitioner makes a prime facia case of showing that there's prior art that exists, if the Patent Owner wishes to rely upon an earlier priority, the burden falls onto the

shoulders of the patent owner to demonstrate that it is entitled to the benefit of earlier foreign priority, and to do that would require a showing that the claims and the limitations of the claims find one-twelfth support in the earlier priority document.

That didn't happen here. Rather, the Patent Owner just argued that the petitioner has a deficient petition because it failed to prove in its petition that the 696 patent was not entitled to the benefit of foreign priority.

So, effectively, that's the burden shifting that we would like to focus on in the reply. The authority that the Patent Owner relied upon for suggesting that that's an appropriate action here was a board decision in 2013 called Polaris Wireless, and we'd also like to address in the reply the specific legal issues associated with Polaris Wireless and the fact that Polaris Wireless, being the board's decision from 2013, was actually implicitly overruled by the Federal Circuit decision in Dynamic Drinkware from 2015, which clearly set forth the burden of framework.

But even more importantly, a later board decision in the Core Survival case from February 19th of this year, 2016, actually addressed an issue very similar to the one in this case that deals with the priority, and the Core Survival board expressly filed the burden framework that's set forth in Dynamic Drinkware and expressly rejected the same types of arguments that Patent Owner is making in this case, and that is that Polaris Wireless provided some justification for not following the burden framework, the appropriate burden framework, as later set forth in Dynamic Drinkware.

Specifically, in Core Survival, the board found that there is no initial burden on the Petitioner to contest the benefit of priority. Rather, that falls on the shoulders of the Patent Owner. So to suggest, as Patent Owner has done here, that there's a deficiency in the petition based upon a theory of burden shifting is inappropriate and one that we would like to further address in a reply.

JUDGE CHAGNON: Thank you.

We'll hear from Patent Owner.

MR. BAUGHMAN: Thanks, Your Honor. It's Steve Baughman for Patent Owner.

Respectfully, it was Petitioner who raised fully in the four petitions the legal and factual issues concerning the prior art status of this "grill" reference in relation to the challenged claims of the 696 patent. That's clear from Rule 22(A)(2), which requires a full statement of the reasons for the relief requested, governing law, rules, and precedent.

It is clear from the Polaris case, which we did cite in our Patent Owner Preliminary Response and which, importantly, is discussed in Core Survival, as Patent Owner just acknowledged, but in a way, I think Patent Owner is overlooking. If you take a look, Your Honors, at page 9 of Core Survival, in Footnote 3, you'll see that the board in this much more recent case talks approvingly about Polaris as identifying the best practice for what's supposed to be in a petition in terms of what the petition should contain, and it warns about the kind of gamesmanship that the Petitioner engaged in here, and I would like

to read a piece of that footnote.

"Although the Patent Owner initially bears the burden of production on the issue of priority, there is generally no opportunity for a petitioner to submit additional evidence or argument at the institution stage. Thus, if the patent owner meets its burden and the petition contains nothing to rebut presumptively Patent Owner's evidence supporting a priority claim, the petitioner's case is in peril."

And what Polaris says, the Polaris case we cited, IPR2013-00323, Paper 9 at page 29 is that our obligation to respond about the priority date of our 696 patent claims is commensurate in scope with the points and contentions raised by the Petitioner, and that's what we did here in the Patent Owner Preliminary Response.

They raised three arguments that they thought indicated a lack of priority to the facial claim to the foreign priority document, which is, I think, uncontested, and we responded to those. Therefore, for purposes of institution, we have met our burden and the date that needed to be responded to for the

696 patent is that foreign priority date.

We also cited the alarm.com case, IPR2016-00129, which shows the burden of production is initially on the petitioner, and the need to show the grill was prior art as of its provisional date was on the petitioner's shoulder to deal with. Frankly, as the petition recognized, I think when Your Honors take a look at what's in the petition, you'll see that they did already raise and brief these issues.

They briefed the issue of 696's entitlement to its foreign priority. They addressed the grill's entitlement to its foreign provisional filing date, although in a way that we think is procedurally improper by incorporating by reference, and they cited a bunch of case law and precedent to these issues at pages 20 and 21 and pages 28 and 29 and Note 3 in the proceeding we've been discussing, the 1376 proceeding.

So there's certainly no surprise about what needed to be argued here. The priority claim is on the face of the patent to meet that foreign priority

date, their grill reference needed, the benefit of its provision.

They made arguments about what burden the law imposed. We responded to those arguments in our Patent Owner preliminary response. I think in our meet and confer, Petitioner didn't identify anything they thought we had misstated in the cases we cited. Again, Polaris is addressed and not, I think, in the way that's pertinent here.

In Core Survival, it's showing that it is still not only good law, but also shows best practice in the petition if Petitioner wants to raise it at institution.

So, respectfully, there's no reason here for Petitioner to brief again these legal issues it already raised in its four petitions. The rule they're invoking here, Rule 108(C) about the possibility of reply for good cause, was added because of the possibility of declaration evidence from the Patent Owner, and there's no argument here that Petitioner's request results from something like that.

It's really just a wish to re-brief the legal issues it's already raised and, respectfully, it's improper to use our paper as a roadmap for a do-over on this legal briefing and, again, to get around the word limits in their petition with additional paper to argue something they should have addressed if they thought it was going to be pertinent at institution in their petition at greater length, because, again, they raised the issues. They made decisions about what to say about them, cited the cases they thought were important and left it at that.

So there's really no cause for a do-over now to reargue the law before the board, including their own Core Survival case that told them they wouldn't get a second chance.

Again, it's prejudicial to have more briefing on this now, not only in terms of the clock ticking, but also because institution is one of the few points in these proceedings where patent owners get a chance to respond with the last word on the adequacy of what the petition has shown. There's no good cause here to divert from that normal structure the laid out for

briefing.

The law has been put before the board. I'm not sure Your Honors will be able to work through the cases that both sides have cited, and if the board were to grant here still more briefing, it's hard to really imagine a situation in which a reply brief would be denied, because these issues have been raised and addressed by both sides.

Thanks, Your Honor.

JUDGE CHAGNON: Thank you.

Just a couple of questions that I have: If we were to authorize briefing, Petitioner, what kind of timing and pages are you seeking?

MR. JIRON: Your Honor, this is counsel for Petitioner. We were thinking approximately seven pages and about a week, so maybe due a week from today.

JUDGE CHAGNON: Okay. And would Patent Owner be requesting a surreply?

MR. BAUGHMAN: Yes, Your Honor. We don't think that that number of pages is anywhere appropriate given the attention this was given by

Petitioner in its opening papers, though we would ask for a commensurate number of pages to respond if they were given all this additional briefing.

We'd respectfully suggest two pages should be more than sufficient since all the cases have been briefed already.

JUDGE CHAGNON: Okay. Thank you.

I just want to make sure that we've heard everybody's positions on all of these issues.

So, Petitioner, do you have anything else quickly to add?

MR. JIRON: Yes, Your Honor, just on a couple of quick points in rebuttal.

This isn't a do-over, as counsel for Patent Owner suggested. It is not to address anything that we thought we got wrong somehow in the petition. It's actually to address a specific really unforeseeable position that the Patent Owner has raised, one that couldn't be foreseen because it's one that goes against the Federal Circuit law. It's one that, basically, attempts to shift the burden, one that's clearly defined in the law as on the

Patent Owner to establish entitlement to foreign priority, basically, to shift that burden to Petitioner to disprove that that entitlement exists, and that's what we were hoping for in the reply, was to address that issue in the law.

Counsel for Patent Owner read a couple of things from Corelogic and suggested that, as Corelogic does say, it talks about best practices, and the evidence that was included was the few examples from the claims that Petitioner believes are not supported in the earlier foreign priority documents were raised as best practices, as was the evidence from the claim chart in Appendix B, which actually talks about an even further level down of the support in the prior art provision, that provides support there.

So those things were raised as best practices, but that doesn't change the fact that the burden of establishing entitlement to foreign priority lies with the patent owner, and that's what the Patent Owner is effectively arguing should be shifted onto the shoulders of the Petitioner.

I'd like to read just a couple of excerpts from the Core Survival case that Patent Owner did not include in his excerpts.

Specifically, the Core Survival case when addressing the Dynamic Drinkware case that: "We do not agree with Patent Owner that Petitioner has the initial burden of showing that the patent at issue is not entitled to an earlier priority date for unpatentability purposes. Rather, a patentee must demonstrate entitlement to a priority date when patentee relies on that priority date to overcome an anticipation or obviousness argument."

So, clearly, they're restating the Dynamic Drinkware principle that the patentee is the one that bears the burden to establish entitlement to the priority date.

Additionally, the Core Survival board said that: "Contrary to the Patent Owner's position, the only showing that the Petitioner needed to make is that the art must have existed as of the date of invention, presumed to be the filing date of the application, until an earlier date is proved."

And that's what needs to occur here. The Patent Owner, if it's going to rely upon a priority date has to prove.

The Core Survival board also said that Patent Owner -- quote: Patent Owner fails to direct us to and is leaving us to discern independently any support for Polaris Wireless for the proposition that a petitioner has any initial burden to contest entitlement to a provisional filing date. The law is clear that there is no initial burden on Petitioner to rebut a provisional date."

That's directly following Dynamic Drinkware and that's what, basically, Patent Owner is suggesting should happen here, is that the burden should be on the shoulders of Petitioner to disprove entitlement to an earlier prior date. Effectively, the Patent Owner's argument is one that would suggest that there is -- rather than a burden existing at all with a patent owner to prove that it's entitled to foreign priority, the patent owner is basically suggesting it replace that with a presumption that foreign priority exists if and until the petitioner

can disprove it.

That's one that clearly goes against the guidance set forth in even Section 706 of .02 of the MPEP and well-established cases that say that if a foreign priority is to be relied upon, it has to be established by showing one-twelfth support for the limitations of the claims, not only in the MPEP guidance, but several cases from the Federal Circuit.

JUDGE CHAGNON: Okay.

MR. BAUGHMAN: Your Honor --

JUDGE CHAGNON: I'm sorry. I talked over somebody.

MR. BAUGHMAN: I apologize, Your Honor. Steve Baughman for Patent Owner. If I could just briefly respond, understanding it should be brief.

JUDGE CHAGNON: Yes. Go ahead.

MR. BAUGHMAN: I guess a couple of things: We clearly are reading the cases differently. I don't think there's anything in Core that suggests that Polaris has been overruled. There's a disagreement on some of the language here, but I think that one of the things that's being overlooked,

also, is that the situation factually is different as shown in Footnote 3.

In that case, there was no evidence or argument produced by Patent Owner to support an earlier priority date claim. Here, we have an affirmative argument in three points from Petitioner about what is supposed to be the problem in terms of priority. Each of those was addressed.

So that's certainly different from the situation faced by the Core panel, which, again, notes the best practices of the Polaris case that Petitioner purports to have followed here.

I will note that the alarm.com case, which we cited in our preliminary response, is certainly also post-Dynamic Drinkware. It talks about it and it talks about the Petitioner's obligation to show the benefit of provisional filing dates and cites something that happened in this case as well. That's Petitioner recognizing that there are concerns in the petition itself with whether they might need to do that, and I think Your Honors have all you need to see in the petition where the Patent Owner is talking

at length about burden shifting and then saying, Well, in case we do need to show it, here's all this material in our expert's declaration at pages 28 to 29, Footnote 3 of the petition.

So, again, I think the law says what it says. It's hard to imagine we need seven pages of briefing on it in addition to what the parties have already provided, and, respectfully, we think the cases speak for themselves.

JUDGE CHAGNON: Thank you.

Just to confirm, the cases that we've been discussing on the call right now, I believe these are all cited somewhere either in the petition or the preliminary response. Is that accurate?

MR. BAUGHMAN: For Patent Owner, that's correct, Your Honor.

MR. JIRON: Same for Petitioner.

JUDGE CHAGNON: Okay. Great.

Give me one second to confer with my panel.

[Pause.]

JUDGE CHAGNON: I think we have everything that we need. So we'll consider all the information

that you've given us today and we will issue an order very quickly, understanding the time constraints that are at issue in this case.

Does either party have any further questions?

MR. JIRON: None from Petitioner, Your Honor.

MR. BAUGHMAN: None from Patent Owner, Your Honor.

JUDGE CHAGNON: All right. Well, if nobody else has any questions, and I believe I heard there were none, we will adjourn call and have the order out soon.

Thank you all.

[Whereupon, at 2:35 p.m., the conference call concluded.]

CERTIFICATE OF COURT REPORTER AND NOTARY PUBLIC

I, CATHERINE B. CRUMP, a court reporter and Notary Public, hereby certify that the foregoing proceedings were recorded by me stenographically and thereafter reduced to typewriting under my direction.

I further certify that present on behalf of Party Taiwan Semiconductor Manufacturing Company, Ltd. were Darren M. Jiron, Esq., J. Preston Long, and Joshua Goldberg, Esq. of Finnegan, Henderson, Farabow, Garrett & Dunner, LLP, and on behalf of Party Godo Kaisha IP Bridge 1 were J. Steven Baughman, Esq.,Andrew N. Thomases, Esq., and Jordan Rossen of Ropes & Gray, LLP.

I further certify that I am not related to, nor associated with any of the parties or their attorneys, nor do I have any disqualifying interest, personal or financial in the actions within.

Dated this 16th day of November 2016 at Prince William County, Virginia.

CATHERINE B. CRUMP

My Commission Expires: May 31, 2017