

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
WESTERN DIVISION**

GUNTERT & ZIMMERMAN CONST.)	
DIV., INC., a California Corporation,)	
)	Case No. 5:20-cv-04007-CJW-KEM
Plaintiff,)	
)	PLAINTIFF GUNTERT &
v.)	ZIMMERMAN CONSTRUCTION
)	DIVISION, INC.'S INITIAL
GOMACO CORP., an Iowa Corporation,)	DISCLOSURE OF INFRINGEMENT
)	CONTENTIONS
Defendant.)	
)	

Plaintiff Guntert & Zimmerman Construction Division, Inc. (“G&Z”) makes the following Initial Disclosure of Infringement Contentions to Gomaco Corp. (“Gomaco”). This disclosure is based upon information presently known and reasonably available to G&Z as of this date, as G&Z’s investigations are ongoing and discovery is underway. Accordingly, G&Z reserves the right to amend, modify, supplement, or narrow any portion of this disclosure as appropriate, as more information becomes known to G&Z, including any relevant claim construction.

Defendant infringes Claims 1-13 of U.S. Patent No. 9,708,020 (“the ‘020 Patent”), Claims 1-15 of U.S. Patent No. 9,908,571 (“the ‘571 Patent”), Claims 1-20 of U.S. Patent No. 10,029,749 (“the ‘749 Patent”), Claims 1-20 of U.S. Patent No. 10,053,167 (“the ‘167 Patent”), and Claims 1-19 of U.S. Patent No. 10,196,101 (“the ‘101 Patent”) (collectively “the Asserted Patents”). The following products infringe the Asserted Patents:

- GP3 (Four Track) – infringing all of the Asserted Patents;
- GP4 (Four Track) – infringing all of the Asserted Patents;
- GP-2400 – infringing the ‘749, ‘101, ‘571, and ‘167 Patents;
- Commander III (Three Track) – infringing the ‘749, ‘101, and ‘571 Patents;
- Commander III (Four Track) – infringing the ‘749, ‘101, ‘571, and ‘167 Patents;
- 3300 – infringing the ‘749, ‘101, ‘571, and ‘167 Patents;

- Xtreme GT-3600 – infringing the ‘749 Patent;
- Xtreme Commander IIIx (Three Track) – infringing the ‘749 and ‘571 Patents; and
- Xtreme Commander IIIx (Four Track) – infringing the ‘749 and ‘571 Patents

Paul D. Lundberg (#WO0003339)
 (Lead Counsel)
 LUNDBERG LAW FIRM, P.L.C.
 600 4th Street, Suite 906
 Sioux City, IA 51101
 (712) 234-3030
 paul@lundberglawfirm.com

Dated: June 19, 2020

By: /s/ Paul J. Andre
 Paul J. Andre (admitted *pro hac vice*)
 Lisa Kobialka (*pro hac vice* pending)
 James Hannah (admitted *pro hac vice*)
 Austin Manes (admitted *pro hac vice*)
 KRAMER LEVIN NAFTALIS
 & FRANKEL LLP
 990 Marsh Road
 Menlo Park, CA 94025
 (650) 752-1700
 pandre@kramerlevin.com
 lkobialka@kramerlevin.com
 jhannah@kramerlevin.com
 amanes@kramerlevin.com

Attorneys for Plaintiff
 GUNTERT & ZIMMERMAN
 CONSTRUCTION DIVISION, INC.

PROOF OF SERVICE

I, Steven D. Dennison, am employed in the Menlo Park, California office of Kramer Levin Naftalis & Frankel LLP. I am over the age of 18 and not a party to the within action. My business address is 990 Marsh Road, Menlo Park, California 94025. I am readily familiar with the firm's practice of collecting and processing of mail for mailing with the U.S. Postal Service and overnight delivery services.

On June 19, 2020, I caused the following document(s) to be served:

**PLAINTIFF GUNTERT & ZIMMERMAN CONSTRUCTION DIVISION, INC.'S
INITIAL DISCLOSURE OF INFRINGEMENT CONTENTIONS**

by electronic mail, addressed as follows:

Luke J. McCammon (Admitted *pro hac vice*)
David K. Mroz (Admitted *pro hac vice*)
Sonja W. Sahlsten (Admitted *pro hac vice*)
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, LLP
901 New York Avenue, NW
Washington, DC 20001-4413
Telephone: (202) 408-4000
Facsimile: (202) 408-4400
luke.mccammon@finnegan.com
david.mroz@finnegan.com
sonja.sahlsten@finnegan.com

Thaddeus Cosgrove, AT0001750
Cosgrove Law Firm
607 W. Second Street
Ida Grove, Iowa 51445
Telephone: (712) 364-4138
Facsimile: (712) 364-4445
tcosgroveig@netllc.net

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 19, 2020, in San Jose, California.

Steven D. Dennison