

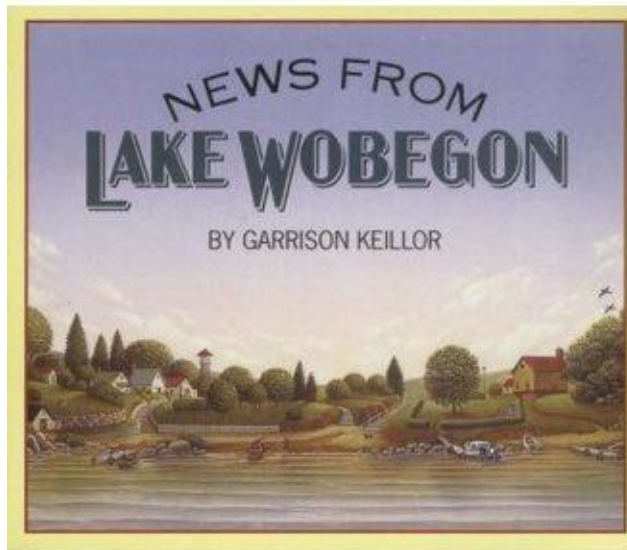
MORRISON
FOERSTER

FOR SERVICES RENDERED:
SEEKING FEES FOR
EXCEPTIONALITY

Rich Hung

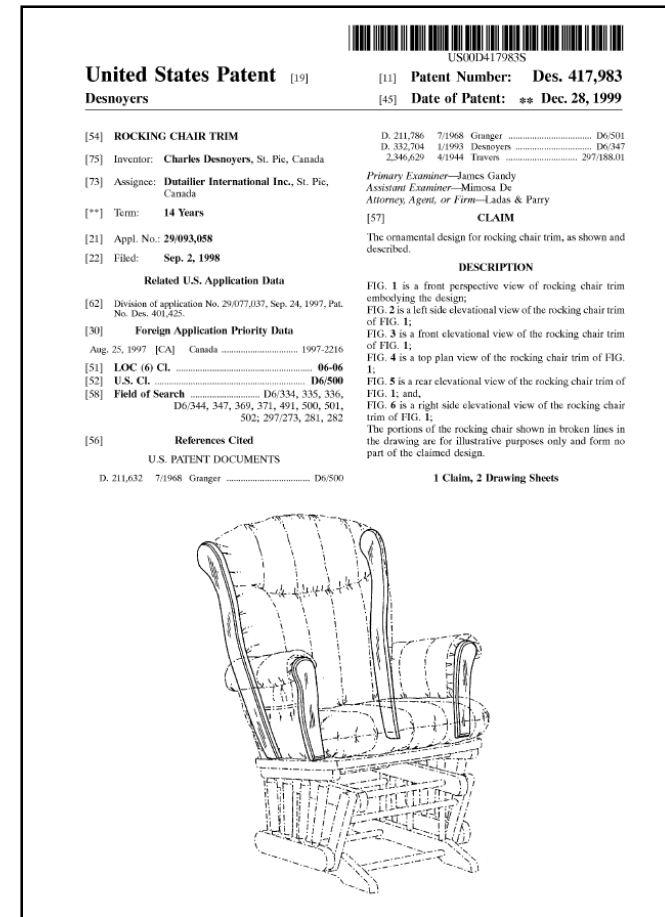
December 8, 2016

The court in ***exceptional cases*** may award attorney's fees to the prevailing party.



Old Law: *Brooks Furniture*

- Large company
- Multiple infringement opinions: “Reasonable, comprehensive & competent” – at first glance
- “Harsh” cease & desist letters to multiple companies, large & small
- Opinion & litigation firm same



Brooks Furniture: Procedural History

- Brooks filed Tenn. DJ action
- Won MSJ of non-infringement
- Reliance on opinion's “unreasonable” conclusions = bad faith
- So exceptional case

United States Court of Appeals for the Federal Circuit

03-1379

BROOKS FURNITURE MANUFACTURING, INC.,
Plaintiff-Appellee,

v.

DUTAILIER INTERNATIONAL, INC. AND DUTAILIER, INC.,
Defendants-Appellants.

DECIDED: January 4, 2005

Before NEWMAN, LOURIE, and DYK, Circuit Judges.
NEWMAN, Circuit Judge.

Dutailier International, Inc. and Dutailier, Inc. (together “Dutailier”), appeal the decision of the United States District Court for the Eastern District of Tennessee¹ holding that Brooks’ action for declaratory judgment that Dutailier’s patent is invalid and not infringed constitutes an exceptional case and awarding attorney fees. The award is vacated.

¹ Brooks Furniture Mfg., Inc. v. Dutailier Int’l, Inc., No. 3:00-CV-072 (E.D. Tenn. Apr. 3, 2003); Memorandum Opinion Dec. 18, 2001; Claim Construction Sept. 4, 2001.

Brooks Furniture: Bad Faith + Baseless

Absent misconduct in conduct of the litigation or in securing the patent, sanctions may be imposed against the patentee only if both[:]

(1) the litigation is brought in ***subjective bad faith***, and

(2) the litigation is ***objectively baseless***.

Brooks Furniture, Mfg. Inc. v. Dutailier Int'l, Inc.,
393 F.3d 1378, 1381 (Fed. Cir. 2005)
(citing *Prof. Real Estate Investors v. Columbia Pictures Indus.*,
508 U.S. 49, 60-61 (1993))

Brooks Furniture: Clear & Convincing

There is a presumption that the assertion of infringement of a duly granted patent is made in good faith. . . . Thus, the underlying improper conduct and the characterization of the case as exceptional must be established by ***clear and convincing evidence***.

Brooks Furniture, Mfg. Inc. v. Dutailier Int'l, Inc.,
393 F.3d 1378, 1382 (Fed. Cir. 2005)

Aftermath of *Brooks Furniture*

- Objective prong:

The question is whether iLOR's broader claim construction was so unreasonable that ***no reasonable litigant could believe it would succeed.***


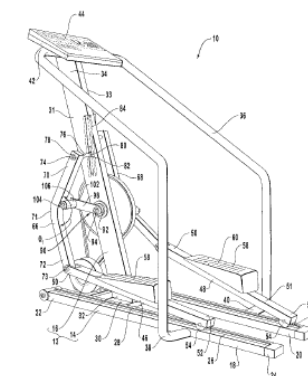
- Subjective prong:

[T]he plaintiff's case must have no objective foundation, and the ***plaintiff must actually know this.***

iLOR, LLC v. Google, Inc.,
631 F.3d 1372, 1377-78 (Fed. Cir. 2011)

New Law: *Octane*

- ICON non-practicing patentee
- Octane makes competing elliptical machines

 US006019710A	
United States Patent [19]	
Dalbout et al.	
Patent Number: 6,019,710	
Date of Patent: Feb. 1, 2000	
[54] EXERCISING DEVICE WITH ELLIPTICAL MOVEMENT	
[75] Inventors: William T. Dalbout, Logan; Steven Mott, Clinton, both of Utah	
[73] Assignee: ICON Health & Fitness, Inc., Logan, Utah	
[21] Appl. No.: 09/003,322	
[22] Filed: Jan. 6, 1998	
[51] Int. Cl. ⁷ A63B 22/04; A63B 69/16	
[52] U.S. Cl. 482/70; 482/51	
[58] Field of Search 482/51-53, 57, 482/70, 79, 80, 71	
References Cited U.S. PATENT DOCUMENTS	
3,316,898 5/1967 Brown 482/57 5,242,343 9/1993 Miller 482/57 5,383,829 1/1995 Miller 482/57 5,518,473 5/1996 Miller 482/57 5,522,246 6/1996 Rodgers, Jr. 482/57 5,529,555 6/1996 Rodgers, Jr. 482/57 5,540,637 7/1996 Rodgers, Jr. 482/52 5,549,526 8/1996 Rodgers, Jr. 482/57 5,562,574 10/1996 Miller 482/51 5,573,480 11/1996 Rodgers, Jr. 482/57 5,577,985 11/1996 Miller 482/52 5,591,107 1/1997 Rodgers, Jr. 482/57 5,593,371 1/1997 Rodgers, Jr. 482/51 5,593,372 1/1997 Rodgers, Jr. 482/52 5,595,553 1/1997 Rodgers, Jr. 482/51	
[57] ABSTRACT An exercise apparatus includes a base having a support stand upstanding therefrom. A pair of spaced apart foot rails each have a first end and opposing second end. The second end of each foot rail rests on the base of the frame. A pair of stroke rails each have a first end and an opposing second end. The first end of each stroke rail is slidably attached to the support stand of the frame while the second end of each stroke rail is hingedly attached to a corresponding foot rail. An axle of a crank is rotatably mounted to the support stand. A pair of crank arms each orthogonally project from the corresponding ends of the axle in opposing directions. Each remote end of the crank arm is rotatably mounted to a corresponding stroke rail between the ends thereof.	
34 Claims, 6 Drawing Sheets	
	

Octane: Facts

- “Stray comments” in e-mail:

“We’re suing Octane. Not only are we coming out with a greater product to go after them, but throwing a lawsuit on top of that.”

“Just clearing the way and making sure you guys have all your guns loaded.”

“I heard we are suing Octane!”

“Yes – old patent we had for a long time that was sitting on the shelf. They are just looking for royalties.”



Octane: Procedural History

- Minnesota action
- SJ of non-infringement
- Arguments not “frivolous” or “objectively baseless”
- CAFC affirms non-exceptional case
- S. Ct. reverses & remands

(Slip Opinion)

OCTOBER TERM, 2013

1

Syllabus

NOTE: Where it is feasible, a syllabus (headnote) will be released, as is being done in connection with this case, at the time the opinion is issued. The syllabus constitutes no part of the opinion of the Court but has been prepared by the Reporter of Decisions for the convenience of the reader. See *United States v. Jindal; Timber & Lumber Co.*, 200 U.S. 511, 517.

SUPREME COURT OF THE UNITED STATES

Syllabus

OCTANE FITNESS, LLC *v.* ICON HEALTH & FITNESS, INC.

CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE FEDERAL CIRCUIT

No. 12–1184. Argued February 26, 2014—Decided April 29, 2014

The Patent Act’s fee-shifting provision authorizes district courts to award attorney’s fees to prevailing parties in “exceptional cases.” 35 U.S.C. §285. In *Brooks Furniture Mfg., Inc. v. Dutailier Int’l, Inc.*, 393 F.3d 1378, 1381, the Federal Circuit defined an “exceptional case” as one which either involves “material inappropriate conduct” or is both “objectively baseless” and “brought in subjective bad faith.” *Brooks Furniture* also requires that parties establish the “exceptional” nature of a case by “clear and convincing evidence.” *Id.*, at 1382.

Respondent ICON Health & Fitness, Inc., sued petitioner Octane Fitness, LLC, for patent infringement. The District Court granted summary judgment to Octane. Octane then moved for attorney’s fees under §285. The District Court denied the motion under the *Brooks Furniture* framework, finding ICON’s claim to be neither objectively baseless nor brought in subjective bad faith. The Federal Circuit affirmed.

Held: The *Brooks Furniture* framework is unduly rigid and impermissibly encumbers the statutory grant of discretion to district courts. Pp. 7–12.

(a) Section 285 imposes one and only one constraint on district courts’ discretion to award attorney’s fees: The power is reserved for “exceptional” cases. Because the Patent Act does not define “exceptional,” the term is construed “in accordance with [its] ordinary meaning.” *Sebelius v. Cloer*, 569 U.S. _____. In 1952, when Congress used the word in §285 (and today, for that matter), “[e]xceptional” meant “uncommon,” “rare” or “not ordinary.” Webster’s New International Dictionary 689 (2d ed. 1934). An “exceptional” case, then, is simply one that stands out from others with re-

Octane: “Exceptional” Means Exceptional

The Patent Act does not define “exceptional,” so we construe it “in accordance with [its] **ordinary meaning.**” . . .

In 1952, when Congress used the word in § 285 (and today, for that matter), “[e]xceptional” meant “**uncommon,**” “**rare,**” or “**not ordinary.**”

Octane Fitness, LLC v. ICON Health & Fitness, Inc.
134 S. Ct. 1749, 1756 (2014)

Octane: Weak Substance or Unreasonable

We hold, then, that an “exceptional case” is simply one that ***stands out from others*** with respect to the ***substantive strength*** of a party’s litigating position (considering both the governing law and the facts of the case) or the ***unreasonable manner in which the case was litigated***.

District courts may determine whether a case is “exceptional” in the case-by-case exercise of their ***discretion***, considering the ***totality of the circumstances***.

[T]here is ***no precise rule or formula*** for making these determinations. . . .

Octane Fitness, LLC v. ICON Health & Fitness, Inc.
134 S. Ct. 1749, 1756 (2014)

Octane: Preponderance Standard

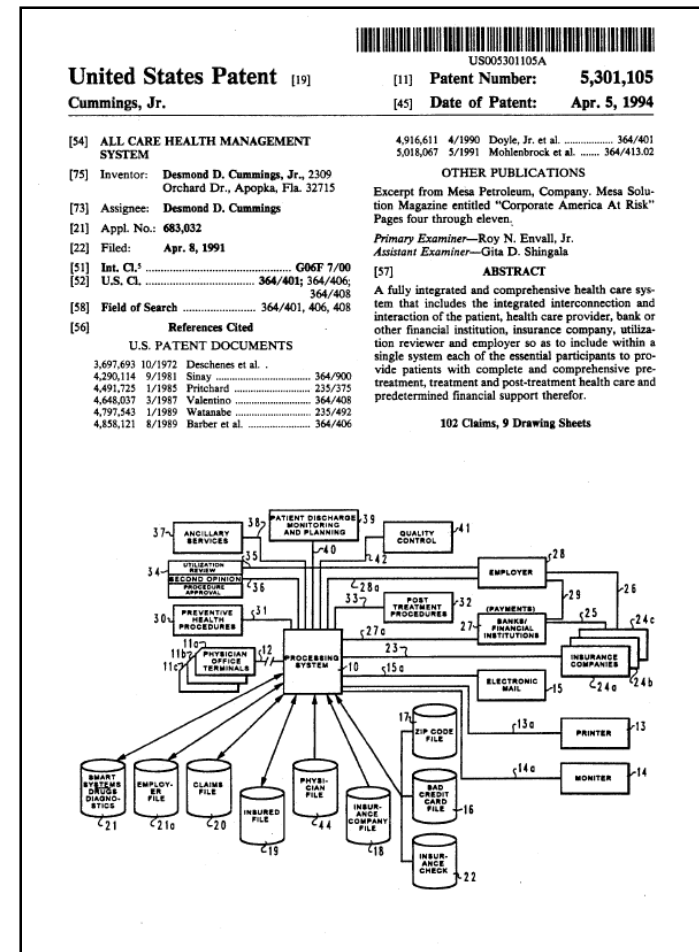
[W]e reject the Federal Circuit’s requirement that patent litigants establish their entitlement to fees under § 285 by “clear and convincing evidence[.]” . . .

Section 285 demands a simple discretionary inquiry; it imposes no specific evidentiary burden, much less such a high one. Indeed, patent-infringement litigation has always been governed by a ***preponderance of evidence standard***.

Octane Fitness, LLC v. ICON Health & Fitness, Inc.
134 S. Ct. 1749, 1756 (2014)

New Law: *Highmark*

- Managed health care systems to interconnect physicians, patients & financial institutions
- Highmark is a Penn. insurance co.
- Case transferred to W.D. Tex.
- Withdrew claim 102
- MSJ of non-infringement for claim 52 & dependent claim 53



Highmark: Procedural History

- Exceptional because:
 - Frivolous assertion of claims 52 & 102
 - Frivolous *res judicata* argument
 - Misrepresentations in transfer motion
- On *de novo* review, CAFC reverses in part:
 - Claim 102: Implausible that preamble not limiting; no “interaction” btw. patients & employers
 - Claim 52: Construction covering alt. embodiment “not unreasonable”
 - *Res judicata*: Argument not wholly meritless when asserted -- and withdrawn
 - Minor adjustments to claim construction OK
 - Misrepresentation before *another* court

United States Court of Appeals for the Federal Circuit

HIGHMARK, INC.,
Plaintiff-Appellee,

v.

ALLCARE HEALTH MANAGEMENT SYSTEMS,
INC.,
Defendant-Appellant.

2011-1219

Appeal from the United States District Court for the
Northern District of Texas in case no. 03-CV-1384, Judge
Terry Means.

Decided: August 7, 2012

CYNTHIA E. KERNICK, Reed Smith, LLP, of Pittsburgh,
Pennsylvania, argued for plaintiff-appellee. With her on
the brief were JAMES C. MARTIN, KEVIN S. KATONA and
THOMAS M. POHL.

DONALD R. DUNNER, Finnegan, Henderson, Farabow,
Garrett & Dunnerr, LLP, of Washington, DC, argued for
defendant-appellant. With him on the brief were ERIK R.
PUKUNYS, of Palo Alto, California. Of counsel on the brief

Highmark: Abuse of Discretion

Because § 285 commits the determination whether a case is “exceptional” to the discretion of the district court, that decision is to be reviewed on appeal for ***abuse of discretion***.

Traditionally, . . . decisions on “matters of discretion” are “reviewable for ‘abuse of discretion.’”

Highmark Inc. v. Allcare Health Management Sys., Inc.
134 S. Ct. 1744, 1748 (2014)

Aftermath of *Octane*: Overall Statistics

Section 285 Motions with Outcomes	Sept. 2012- Apr. 2014	May 2014 – (Post- <i>Octane</i>)
Total	84	262
Granted	5 (6%)	65 (25%)
Partial grant/denial	10 (14%)	23 (8%)
Denied	69 (81%)	174 (66%) (8%)

Aftermath of *Octane*: E.D. Tex.

Section 285 Motions with Outcomes	Sept. 2012- Apr. 2014	May 2014 – (Post- <i>Octane</i>)
Total	6	22
Granted	0 (0%)	3 (14%)
Partial grant/denial	0 (0%)	0 (0%)
Denied	6 (100%)	19 (86%)



Aftermath of *Octane*: D. Del.

Section 285 Motions with Outcomes	Sept. 2012- Apr. 2014	May 2014 – (Post- <i>Octane</i>)
Total	5	26
Granted	0 (0%)	7 (27%)
Partial grant/denial	0 (0%)	3 (11%)
Denied	5 (100%)	16 (62%)



Aftermath of *Octane*: C.D. Cal.

Section 285 Motions with Outcomes	Sept. 2012- Apr. 2014	May 2014 – (Post- <i>Octane</i>)
Total	14	32
Granted	1 (7%)	9 (28%)
Partial grant/denial	2 (14%)	2 (6%)
Denied	11 (79%)	21 (66%)



Aftermath of *Octane*: N.D. Cal.

Section 285 Motions with Outcomes	Sept. 2012- Apr. 2014	May 2014 – (Post- <i>Octane</i>)
Total	9	34
Granted	1 (11%)	4 (12%)
Partial grant/denial	0 (0%)	6 (18%)
Denied	8 (89%)	24 (71%)



Aftermath of *Octane*: N.D. Ill.

Section 285 Motions with Outcomes	Sept. 2012- Apr. 2014	May 2014 – (Post- <i>Octane</i>)
Total	0	8
Granted	n/a	2 (25%)
Partial grant/denial	n/a	2 (25%)
Denied	n/a	4 (50%)

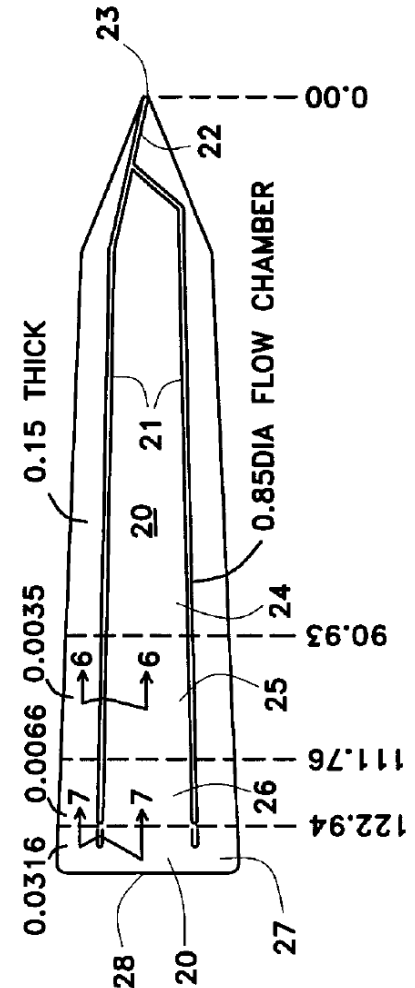


Aftermath of *Octane*: Districts Compared

Section 285 Motions with Outcomes	Sept. 2012- Apr. 2014 Grant/GIP	May 2014 – (Post- <i>Octane</i>) Grant/GIP
Overall	20%	33%
E.D. Tex.	0%	14%
D. Del.	0%	38%
C.D. Cal.	21%	34%
N.D. Cal.	11%	30%
N.D. Ill.	n/a	50%

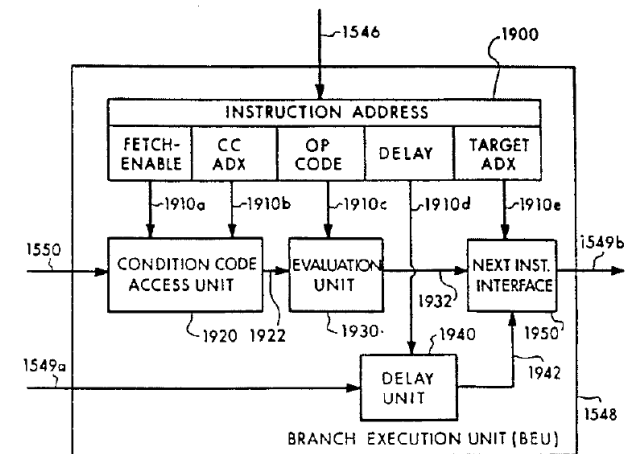
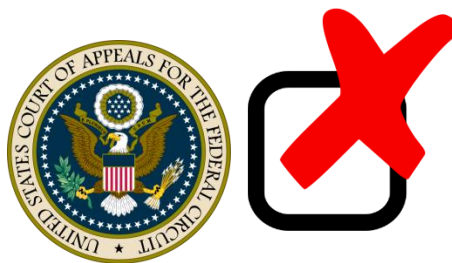
1. *Homeland Housewares, LLC* (C.D. Cal.)

- *Homeland Housewares, LLC v. Sorensen Res. & Dev. Trust* (Fed. Cir. Sept. 8, 2014)
- DJ action concerning patented injection molding process
- Sorensen:
 - Produced no admissible evidence of infringement in response to MSJ after 1+ year of discovery
 - Filed multiple unsolicited briefs after issues taken under submission
 - Filed multiple meritless motions for reconsideration



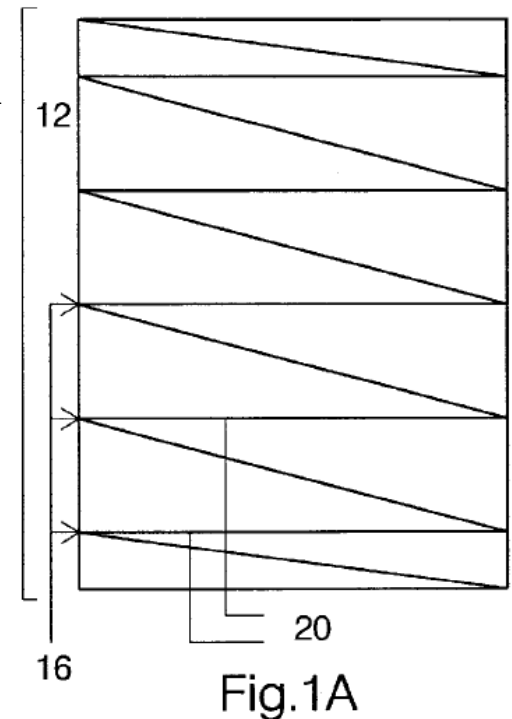
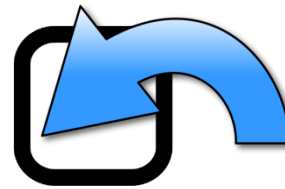
2. *Biax Corp.* (D. Colo.)

- *Biax Corp. v. Nvidia Corp.* (Fed. Cir. Feb. 24, 2015)
- Parallel processing computer systems
- MSJ of non-infringement
 - Condition code registers must be shared by all other processor elements on chip
 - Expert conceded as much at depo.
- Claim construction foreclosed infringement



3. *Oplus Techs.* (C.D. Cal.)

- *Oplus Techs. v. Vizio, Inc.* (Fed. Cir. Apr. 10, 2015)
- De-interlacing video signal patents
- MSJ of non-infringement (no evidence for element)
- Oplus:
 - Strategically amending claims to manufacture venue
 - Ignored discovery, sought extensive damages information
 - Issued subpoena on own counsel
 - Contradictory expert evidence, infringement contentions
 - Inappropriate, unprofessional, vexatious behavior
- But no evidence of bad faith or attempt to harass
 - Delays & avoidance tactics on both sides
 - “Normal” motion practice



4. *Gaymar Indus. (W.D.N.Y.)*

- *Gaymar Indus. Inc. v. Cincinnati Sub-Zero Prods., Inc.* (Fed. Cir. June 25, 2015)
- Conductive blanket patent; IPR invalidated
- CSZ lacked clean hands due to misleading statements/overstatements:
 - “From the outset,” no need for technical expert (but then offered PTO expert)
 - PTO expert was not opining re: POSITA (but was)
 - Gaymar’s positions on the burden of proof for validity

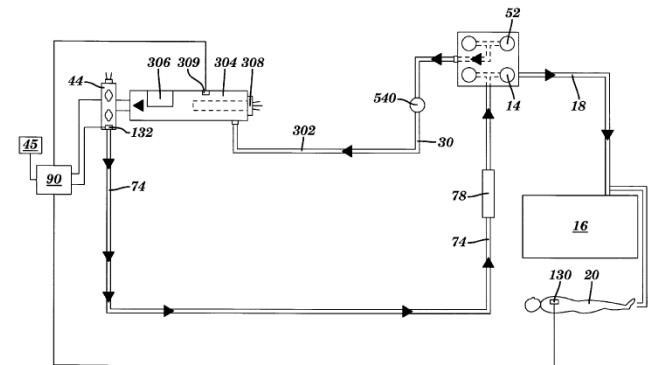
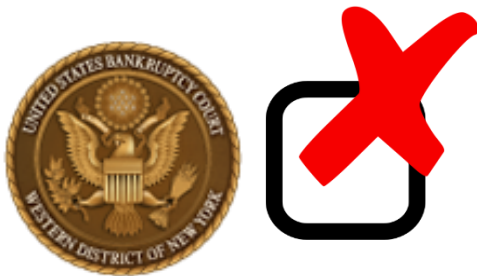
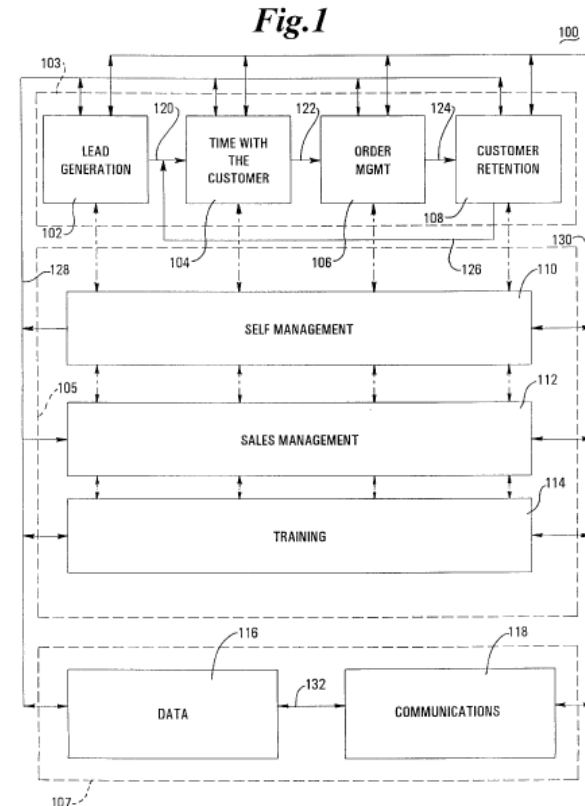


FIG. 6



5. SFA Systems (E.D. Tex.)

- *SFA Sys., LLC v. Newegg, Inc.* (Fed. Cir. July 10, 2015)
- Salesforce automation system
- Newegg:
 - One of two remaining defendants
 - Did not prevail on *Markman* (twice)
 - Did not win MSJ of indefiniteness
- SFA:
 - Multiple lawsuits filed
 - Nuisance value settlement offers
 - Dismisses Newegg with prejudice



6. *Integrated Tech. Corp. (D. Az.)*

- *Integrated Tech. Corp. v. Rudolph Techs.* (Fed. Cir. Oct. 21, 2015)
- Inspection equipment for probe cards
- Rudolph denied infringement
 - Moved for MSJ of non-infringement
 - Questioned ownership of patent
 - Avoided questions about machine operation at trial
- But CEO admits testing – and knowledge of infringement at trial

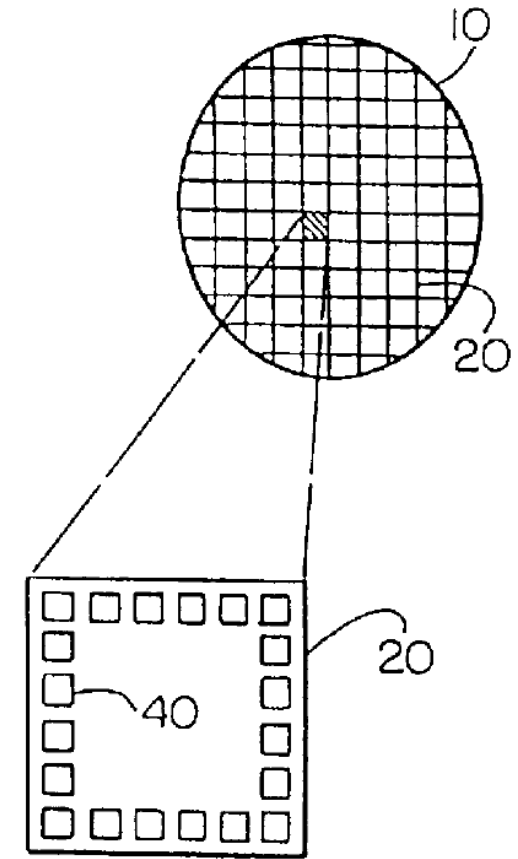


FIG. 1

7. *Lumen View Tech. LLC* (S.D.N.Y.)

- *Lumen View Tech. LLC v. Findthebest.com, Inc.* (Fed. Cir. Jan. 22, 2016)
- “Method for facilitating evaluation” in the context of a “financial transaction”
 - MJOP under Section 101 granted
- “Bilateral matching method” requires preference data of two parties
 - Lumen View’s claim construction consistent
 - Accused AssistMe feature uses one party’s data
- Desire to extract nuisance settlement

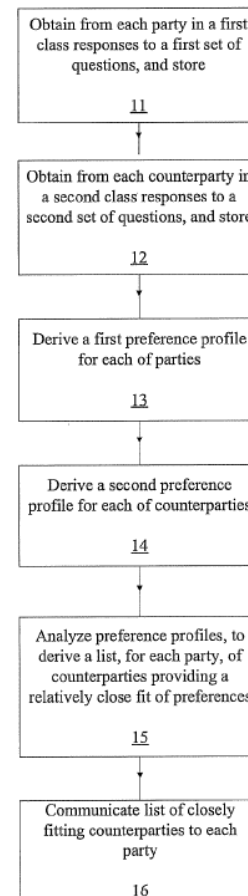
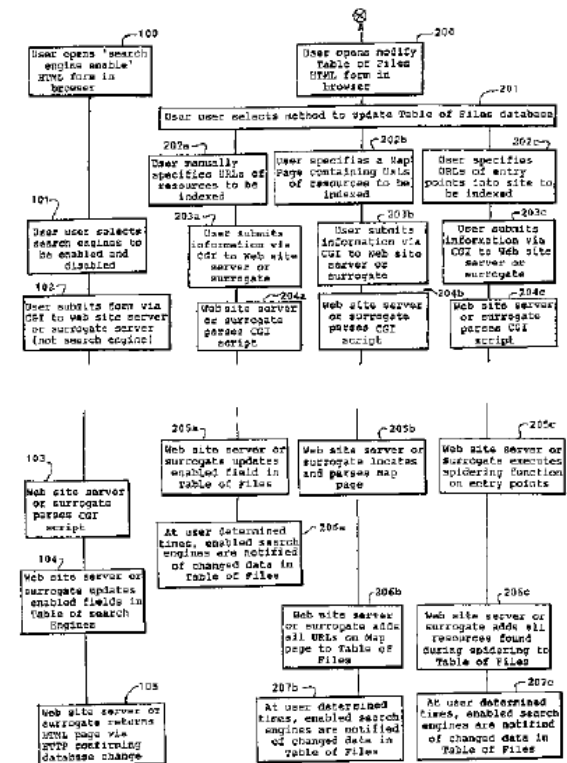


FIG. 1

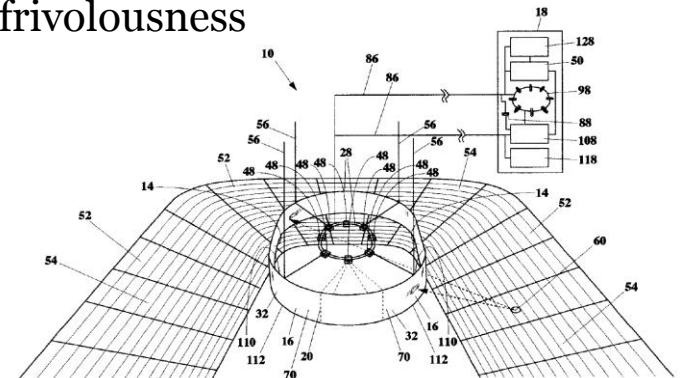
8. *Site Update Solutions, LLC* (N.D. Cal.)

- *Site Update Solutions, LLC v. CBS Corp.* (Fed. Cir. Feb. 1, 2016)
- Updating search engine database
- Newegg:
 - Last defendant
 - Court adopted its constructions
- Site Update:
 - Could not ID structure for 112(6) limitation
 - Positions “unartful” and “strain[ed] credibility”
 - Dismissed all claims with prejudice after *Markman*
 - Nuisance value settlements



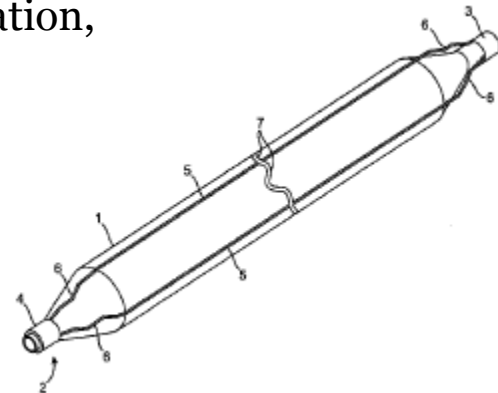
9. *Large Audience Display Sys.* (C.D. Cal.)

- *Large Audience Display Sys., LLC v. Tennman Prods., LLC* (Fed. Cir. Oct. 20, 2016)
- Panoramic imaging & display system
- All asserted claims canceled in inter partes reexam.
- LADS:
 - Shell E.D. Tex. corporation
 - Reexamination constructions “disingenuous”
 - Withheld prior art during reexam. (not relied upon)
 - Post-reexam., sought discovery to assert new claims
 - Submitted privileged e-mail to demonstrate non-frivolousness



10. *AngioScore, Inc.* (N.D. Cal.)

- *AngioScore, Inc. v. Tri-Reme Med. LLC*
- Angioplasty balloon catheter
- Patent survived MSJ of non-infringement
 - Tri-Reme attempted to file second motion on vitiation, but standing order prohibited it
- At trial:
 - No claims infringed
 - All claims invalid



Other Fee Recovery Mechanisms

- FRCP 11 (pleadings)
- FRCP 26(g) (discovery requests, responses & objections)
- FRCP 37(a)(5) (disclosure or discovery)
- FRAP 38 (frivolous appeal)
- Inherent power/authority
- 28 U.S.C. § 1927 (unreasonable & vexatious litigation)

Other Fee Recovery Mechanisms

- Rule 11(b):

(b) Representations to the Court. By presenting to the court a pleading, written motion, or other paper . . . an attorney or unrepresented party certifies that to the best of the person's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances: . . .

(2) *the **claims, defenses, and other legal contentions are warranted by existing law*** or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law; [and]

(3) *the **factual contentions have evidentiary support*** or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery.

Other Fee Recovery Mechanisms

- Rule 11(c)(2):

(c) Sanctions. . . .

(2) If, after notice and a reasonable opportunity to respond, the court determines that Rule 11(b) has been violated, the ***court may impose an appropriate sanction on any attorney, law firm, or party*** that violated the rule or is responsible for the violation. Absent exceptional circumstances, a law firm must be held jointly responsible for a violation committed by its partner, associate, or employee.

- *See also* Rule 26(g) (sanctions for discovery requests, responses, or objections)

Rule 11 Motion Statistics

Rule 11 Motions with Outcomes	Sept. 2012-Apr. 2014	May 2014 – (Post-<i>Octane</i>)
Total	68	88
Granted	8 (12%)	4 (4%)
Partial grant/denial	1 (1%)	3 (3%)
Denied	59 (87%)	81 (92%)

Rule 11 Motions: Districts Compared

Rule 11 Motions with Outcomes	Sept. 2012-Apr. 2014 Grant/GIP	May 2014 – (Post-Octane) Grant/GIP
Overall	13%	7%
E.D. Tex.	33%	16%
D. Del.	50%	12%
C.D. Cal.	0%	0%
N.D. Cal.	0%	11%
N.D. Ill.	20%	20%

Other Fee Recovery Mechanisms

- 28 U.S.C. § 1927:

Any attorney or other person admitted to conduct cases in any court of the United States or any Territory thereof who so ***multiplies the proceedings in any case unreasonably and vexatiously*** may be required by the court to satisfy personally the excess costs, expenses, and attorneys' fees reasonably incurred because of such conduct.

Section 1927 Motion Statistics

Section 1927 Motions with Outcomes	Sept. 2012- Apr. 2014	May 2014 – (Post- <i>Octane</i>)
Total	41	90
Granted	4 (10%)	8 (9%)
Partial grant/denial	1 (2%)	4 (4%)
Denied	36 (88%)	78 (87%)

Section 1927 Motions: Districts Compared

Section 1927 Motions with Outcomes	Sept. 2012- Apr. 2014 Grant/GIP	May 2014 – (Post-Octane) Grant/GIP
Overall	12%	13%
E.D. Tex.	0%	0%
D. Del.	n/a	0%
C.D. Cal.	0%	0%
N.D. Cal.	0%	11%
N.D. Ill.	33%	37%

Other Fee Recovery Mechanisms

- Rule 37(a)(5):

(A) If the motion is granted—or if the disclosure or requested discovery is provided after the motion was filed—the court must, after giving an opportunity to be heard, require the party or deponent whose conduct necessitated the motion, the party or attorney advising that conduct, or both to ***pay the movant's reasonable expenses incurred in making the motion, including attorney's fees.*** But the court must not order this payment if:

- (i) the movant filed the motion before attempting in good faith to obtain the disclosure or discovery without court action;
- (ii) the opposing party's nondisclosure, response, or objection was ***substantially justified***; or
- (iii) other circumstances make an award of expenses unjust.

Other Fee Recovery Mechanisms

- Inherent power/authority:

“[T]he narrow exceptions to the American Rule effectively limit a court's inherent power to impose attorney's fees as a sanction to cases in which a litigant has engaged in ***bad-faith conduct or willful disobedience of a court's orders***[.]”

Chambers v. Nasco, Inc., 501 U.S. 32, 47 (1991)

- FRAP 38:

If a court of appeals determines that an ***appeal is frivolous***, it may, after a separately filed motion or notice from the court and reasonable opportunity to respond, award just damages and single or double costs to the appellee.

Who Pays: Lawyer or Client?

The court in exceptional cases may award attorney's fees ***to the prevailing party.***

Who Pays: Lawyer or Client?

- 28 U.S.C. § 1927:

Any attorney or other person admitted to conduct cases in any court of the United States or any Territory thereof who so multiplies the proceedings in any case unreasonably and vexatiously may be required by the court to satisfy personally the excess costs, expenses, and attorneys' fees reasonably incurred because of such conduct.

- FRAP 38:

If a court of appeals determines that an appeal is frivolous, it may, after a separately filed motion or notice from the court and reasonable opportunity to respond, award just damages and single or double costs ***to the appellee***.

ABA Model Rule 1.7(a)

- Conflict of Interest: Current Clients

(a) [A] lawyer shall not represent a client if the representation involves a ***concurrent conflict of interest***.

A concurrent conflict of interest exists if:

- (1) the representation of one client will be ***directly adverse*** to another client; or
- (2) there is a significant risk that the representation of one or more clients will be ***materially limited*** by the lawyer's responsibilities to another client, a former client or a third person or by a personal interest of the lawyer.

MORRISON

FOERSTER