

UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, D.C.

In the Matter of

**CERTAIN AIR MATTRESS BED SYSTEMS
AND COMPONENTS THEREOF**

Inv. 337-TA-999

**ORDER NO. 9: INITIAL DETERMINATION GRANTING UNOPPOSED JOINT
MOTION OF COMPLAINANTS SELECT COMFORT SC
CORPORATION AND RESPONDENTS RESPONSIVE SURFACE
TECHNOLOGY, LLC AND ELEMENTS OF REST, INC. TO
TERMINATE THIS INVESTIGATION IN PART BASED ON A
CONSENT ORDER**

(November 18, 2016)

On November 4, 2016, complainants Select Comfort Corporation and Select Comfort SC Corporation (collectively “Select Comfort”) and respondents Responsive Surface Technology LLC and Elements of Rest, Inc. (collectively “ReST Respondents”) filed an unopposed joint motion to terminate the investigation as to U.S. Patent No. 7,389,554 (“the ’554 Patent”) based on consent order stipulation.¹ (Motion Docket No. 999-009.) The motion states that respondents American National Manufacturing, Inc. and Dires LLC d/b/a Personal Comfort Bed do not oppose this motion. (Mot. at 2.)

CONSENT ORDER

In accordance with Commission Rule 210.21(c), Select Comfort and the ReST Respondents entered into a “Consent Order Stipulation” and a proposed “Consent Order” for the ’557 Patent, attached hereto as Attachment A. Commission Rule 210.21(c)(3) sets forth certain requirements for the contents of a consent order stipulation. The Proposed Consent Order and

¹ Select Comfort and the ReST Respondents also concurrently filed a motion to terminate the investigation in its entirety based on settlement agreement for U.S. Patent No. 6,804,848. The ALJ granted that motion in Order No. 10, which was issued on this same day.

Consent Order Stipulation submitted by Select Comfort and the ReST Respondents complies with the requirements of Commission Rule 210.21(c)(3).

Specifically, the ReST Respondents agree “not [to] sell for importation, import into the United States or sell in the United States after importation, directly or indirectly, or knowingly² aid, abet, encourage, participate in, or induce the sale for importation, importation into the United States or sale in the United States any Covered Products in the United States that infringe claims 1, 5, 6, 16, 19, 20, 22, 24, or 26 of the ’554 Patent, except under consent or license from Complainants.” (See Proposed Consent Order ¶ 1; see also Consent Order Stipulation ¶ 3.) The ReST Respondents have also stated that “[f]or purposes of disposition of any existing U.S. inventories of Covered Products, the ReST Respondents represent and warrant that no Covered Product is presently in inventory anywhere in the United States.” (Proposed Consent Order ¶ 2.) Select Comfort and the ReST Respondents agree, pursuant to Commission Rule 210.21(c)(3) and (4), as follows:

- (1) The Commission has *in rem* jurisdiction over the Covered Products and *in personam* jurisdiction over the ReST Respondents for purposes of this Consent Order. (See Consent Order Stipulation ¶ 1.)
- (2) ReST expressly waives all right to seek judicial review or otherwise challenge the validity of the Consent Order. (See Consent Order Stipulation ¶ 5; Proposed Consent Order ¶ 3.)
- (3) ReST will cooperate with and will not seek to impede by litigation or other means the Commission’s efforts to gather information under Subpart I of the Commission’s Rules of Practice and Procedure, 19 C.F.R. Subchapter C, Part 210. (See Consent Order Stipulation ¶ 6; Proposed Consent Order ¶ 4.)

² The ALJ notes that the parties have added “knowingly” to the language set forth in Rule 210.21(c)(4)(iii). Rule 210.21(c)(4) specifically states that “[t]he Commission will not issue consent orders with terms beyond those provided for in this section, and will not issue consent orders that are inconsistent with this section.” 19 C.F.R. 210.21(c)(4). The ALJ finds that the addition of “knowingly” neither expands the terms of the consent order nor is it inconsistent with the terms of the consent order. Rather, the addition of “knowingly” merely provides additional clarification, which the ALJ finds acceptable.

- (4) The enforcement, modification and revocation of the Consent Order will be carried out pursuant to Subpart I of the Commission's Rules of Practice and Procedure, 19 C.F.R. Subchapter C, Part 210. (See Consent Order Stipulation ¶ 7; Proposed Consent Order ¶ 8.)
- (5) The signing this Stipulation is for settlement purposes only and does not constitute an admission by the ReST Respondents that an unfair act has been committed. (Consent Order Stipulation ¶ 8.)
- (6) The Consent Order shall have the same force and effect and may be enforced, modified, or revoked in the same manner as is provided in section 337 of the Tariff Act of 1930 and this part for other Commission actions, and the Commission may require periodic compliance reports pursuant to subpart I of this part to be submitted by the person entering into this Consent Order Stipulation. (Consent Order Stipulation ¶ 11.)
- (7) The Consent Order shall become null and void when the '554 Patent expires. (Proposed Consent Order ¶ 6.)

Because this is an intellectual property-based investigation, the Consent Order Stipulation also contains a statement, pursuant to Commission Rule 210.21(c)(3)(ii), that:

- (1) the Consent Order shall not apply with respect to any claim of an intellectual property right that has expired or been found or adjudicated invalid or unenforceable by the Commission or a court or agency of competent jurisdiction, provided that such finding or judgment has become final and non-reviewable (*see* Consent Order Stipulation ¶ 9; *see also* Proposed Consent Order ¶ 7); and
- (2) a representation by ReST that it will not seek to challenge the validity or enforceability of the '554 Patent, in any administrative or judicial proceeding to enforce the Consent Order (*see* Consent Order Stipulation ¶ 10; Proposed Consent Order ¶ 5).

The motion further states, consistent with Commission Rule 210.21(a)(1), that there are no other agreements, written or oral, express or implied, between the ReST Respondents and Select Comfort concerning the subject matter of the investigation with respect to the '554 Patent. (Mot. at 1-2; *see also* Consent Order Stipulation at ¶ 12.)

PUBLIC INTEREST

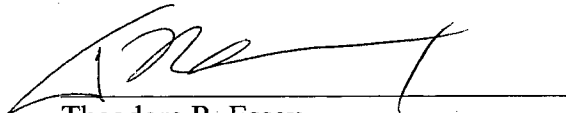
Commission Rule 210.50(b)(2) provides that in the case of a proposed termination by settlement agreement or consent order, the parties may file statements regarding the impact of the proposed termination on the public interest, and the administrative law judge may hear argument, although no discovery may be compelled, with respect to issues relating solely to the public interest. (19 C.F.R. 210.50(b)(2).) “Thereafter, the administrative law judge shall consider and make appropriate findings in the initial determination regarding the effect of the proposed settlement on the public health and welfare, competitive conditions in the U.S. economy, the production of like or directly competitive articles in the United States, and U.S. consumers.” (*Id.*) In their Motion, the parties assert that termination of this Investigation is in the public interest as it will streamline the investigation and conserve the Commission’s and the parties’ resources. (Memo. at 6.)

Based on the pleadings filed in connection with the motion to terminate the investigation including the exhibits attached thereto, the ALJ finds that there is no indication that termination of this investigation as to the ’554 Patent based on the consent order stipulation would have an adverse impact on the public interest. The ALJ finds that the consent order stipulation and the settlement will not have an adverse impact on the public health and welfare within the meaning of Section 337. Additionally, the ALJ finds that there are significant public interest benefits in resolving litigation through settlement thereby avoiding needless litigation and conserving both public resources and private resources.

Accordingly, the ALJ **GRANTS** Motion No. 999-009. This initial determination, along with supporting documentation, is hereby certified to the Commission.

Pursuant to 19 C.F.R. § 210.42(h) this initial determination shall become the determination of the Commission unless a party files a petition for review of the initial determination pursuant to 19 C.F.R. § 210.43(a) or the Commission, pursuant to 19 C.F.R. § 210.44, orders, on its own motion, a review of the initial determination or certain issues herein.

SO ORDERED.

A handwritten signature in black ink, appearing to read 'Theodore R. Essex', is written over a horizontal line.

Theodore R. Essex
Administrative Law Judge

ATTACHMENT A

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C. 20436**

**Before the Honorable Theodore R. Essex
Administrative Law Judge**

In the Matter of

**CERTAIN AIR MATTRESS BED SYSTEMS
AND COMPONENTS THEREOF**

Inv. No. 337-TA-999

**UNOPPOSED JOINT MOTION OF COMPLAINANTS SELECT COMFORT
CORPORATION AND SELECT COMFORT SC CORPORATION AND
RESPONDENTS RESPONSIVE SURFACE TECHNOLOGY, LLC AND ELEMENTS OF
REST, INC. TO TERMINATE THIS INVESTIGATION IN PART BASED ON A
CONSENT ORDER**

Pursuant to Commission Rules 210.15 and 210.21(c) and Ground Rule 3, Complainants Select Comfort Corporation and Select Comfort SC Corporation (collectively, "Complainants") and Respondents Elements of Rest, Inc. and Responsive Surface Technology, LLC ("the ReST Respondents") respectfully jointly move to terminate this investigation as to U.S. Patent No. 7,389,554 based on a consent order stipulation.

Corporate representatives for Complainants and the ReST Respondents have been in negotiations to settle this dispute for the past several weeks. Complainants and the ReST Respondents have reached agreement with respect to the allegations in the Complaint and Notice of Investigation related to the '554 Patent. The ReST Respondents agree not to sell, offer for sale, and/or advertise an air supported sleep system that would infringe any of claims 1, 5, 6, 16, 19, 20, 22, 24, and 26 of the '554 Patent. Complainants and the ReST Respondents agree to the entry of a stipulated consent order which is submitted concurrently herewith. Complainants and the ReST Respondents submit that no other agreements exist, written or oral, express or implied,

between the movants concerning the subject matter of the investigation with respect to the '554 Patent.

Ground Rule 3.2 Certification

Counsel for the non-moving Respondents, American National Manufacturing, Inc. and Dires, LLC d/b/a Personal Comfort Bed ("the ANM Respondents"), was contacted by Complainants' counsel on Wednesday, November 2, 2016. The ANM Respondents do not oppose the motion.

Dated: November 4, 2016

Respectfully submitted,



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And

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**Counsel for Respondents Responsive
Surface Technology LLC and Elements of
Rest Inc.**

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C. 20436**

**Before the Honorable Theodore R. Essex
Administrative Law Judge**

In the Matter of

**CERTAIN AIR MATTRESS BED SYSTEMS
AND COMPONENTS THEREOF**

Inv. No. 337-TA-999

**MEMORANDUM IN SUPPORT OF JOINT MOTION OF COMPLAINANTS SELECT
COMFORT CORPORATION AND SELECT COMFORT SC CORPORATION AND
RESPONDENTS RESPONSIVE SURFACE TECHNOLOGY, LLC AND ELEMENTS OF
REST, INC. TO TERMINATE THIS INVESTIGATION IN PART BASED ON A
CONSENT ORDER**

Pursuant to Commission Rules 210.15 and 210.21(c) and Ground Rule 3, Complainants Select Comfort Corporation and Select Comfort SC Corporation (collectively, “Complainants”) and Respondents Elements of Rest, Inc. and Responsive Surface Technology, LLC (“the ReST Respondents”) respectfully jointly move to terminate this investigation as to U.S. Patent No. 7,389,554 (“the ‘554 Patent”) based on a consent order stipulation.

I. Background

On April 20, 2016, Complainants filed a Complaint alleging infringement of U.S. Patent Nos. 6,804,848 and the ‘554 Patent by the ReST Respondents and others. The Commission determined to institute this investigation on May 18, 2016. Pursuant to the Procedural Schedule (Order No. 6) fact discovery closed on October 21, 2016, the evidentiary hearing is scheduled for January 30, 2017, and the Initial Determination is scheduled to issue on April 24, 2017.

Corporate representatives for Complainants and the ReST Respondents have been in negotiations to settle this dispute for the past several weeks. Complainants and the ReST

Respondents have come to agreement with respect to the allegations in the Complaint and Notice of Investigation related to the '554 Patent.

II. Legal Authority for Entry of Consent Order

The Commission has the authority to terminate an investigation based upon a proposed consent order submitted by a party. The controlling statutory authority states that “the Commission may, by issuing a consent order or on the basis of an agreement between the private parties to the investigation . . . terminate any such investigation” 19 U.S.C. § 1337(c). Commission Rule 210.21(c)(1)(ii) also provides that, at any time prior to the commencement of the hearing in an investigation, one or more of the respondents may move to terminate the investigation by consent order. 19 C.F.R. §210.21(a)(2).

III. Argument

The ReST Respondents agree not to sell, offer for sale, and advertise any air supported sleep system having a medial split which infringes any of claims 1, 5, 6, 16, 19, 20, 22, 24, and 26 of the '554 Patent. Accordingly, the ReST Respondents agree to a stipulated consent order. Thus, the movants request entry of a Consent Order based on the Consent Order Stipulation and Proposed Consent Order submitted herewith.

Under the terms of the Stipulation, the Rest Respondents will not import, sell for importation, or sell after importation any air supported sleep system that infringes claims 1, 5, 6, 16, 19, 20, 22, 24, and 26 of the '554 patent. Entry of the Proposed Consent Order will render moot the dispute between Complainants and the ReST Respondents with respect to the '554 Patent. Thus, termination of this investigation as to the '554 Patent against the ReST Respondents is respectfully requested. Pursuant to Commission Rule 210.21(c), the movants

state that there are no other agreements, written or oral, express or implied, between the movants concerning the subject matter of the investigation with respect to the '554 Patent.

Entry of the Proposed Consent Order is in the public interest, which favors settlement of disputes to avoid needless litigation. Good cause exists for granting the instant motion and entry of the Proposed Consent Order because it will streamline this investigation before the evidentiary hearing by removing all allegations against the ReST Respondents related to the '554 Patent. Granting of the Instant Motion and Entry of the Proposed Consent Order will also conserve the Commission's and the movants' resources.

The Proposed Consent Order and Consent Order Stipulation comply with the Commission's rules and are in the public interest. Thus, the movants respectfully request that the instant Motion be granted and the attached Proposed Consent Order be entered.

Dated: November 4, 2016

Respectfully submitted,



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**Counsel for Respondents Responsive
Surface Technology LLC and Elements of
Rest Inc.**

ATTACHMENT

A

UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C. 20436

Before the Honorable Theodore R. Essex
Administrative Law Judge

In the Matter of

CERTAIN AIR MATTRESS BED SYSTEMS
AND COMPONENTS THEREOF

Inv. No. 337-TA-999

CONSENT ORDER STIPULATION

WHEREAS, the U.S. International Trade Commission on May 18, 2016, instituted this Investigation under Section 337 of the Tariff Act of 1930, as amended (19 U.S.C. § 1337), based upon the Complaint filed by Complainants Select Comfort Corporation and Select Comfort SC Corporation (“the Complainants”) which asserts violations of Section 337 by Respondents Elements of Rest, Inc. and Responsive Surface Technology, LLC (the “ReST Respondents”) in the importation into the United States, the sale for importation, and the sale within the United States after importation of certain air mattress bed systems and components thereof, which includes at least the Prevail and ReST series beds, as further described in paragraphs 19, 20, 21, and 23 of the complaint (collectively, the “Covered Products”), that are alleged to infringe, *inter alia*, U.S. Patent No. 7,389,554 (“the ‘554 Patent”).

WHEREAS, the ReST Respondents and their affiliated companies, parents, subsidiaries, or other related business entities, or their successors or assigns, their principals, stockholders, officers, directors, employees, agents, licensees, distributors, controlled (whether by stock ownership or otherwise) and majority-owned business entities, successors, and assigns, or individuals acting on their behalf and with their authority (collectively “ReST”) agree to forgo

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the sale for importation, importation into, and sales in the United States after importation of Covered Products that infringe claims 1, 5, 6, 16, 19, 20, 22, 24, or 26 of the '554 Patent; and

WHEREAS, the ReST Respondents agree to the entry of a Consent Order by the Commission;

NOW THEREFORE, pursuant to Commission Rule 210.2 1(c)(1)(ii) and (c)(3)(i), the ReST Respondents stipulate and agree as follows in connection with the Joint Motion of Complainants Select Comfort Corporation and Select Comfort SC Corporation and Respondents Elements of Rest, Inc. and Responsive Surface Technology, LLC to Terminate This Investigation in Part Based on a Consent Order Stipulation;

(1) The ReST Respondents stipulate to the entry of a Consent Order in the form filed herewith;

(2) The Commission has *in rem* jurisdiction over the ReST Respondents' Covered Products and *in personam* jurisdiction over the ReST Respondents for purposes of this Consent Order;

(3) Upon entry of the Consent Order, ReST shall not sell for importation, import into the United States, or sell in the United States after importation, directly or indirectly, or knowingly aid, abet, encourage, participate in, or induce the sale for importation, importation into the United States or sale in the United States after importation, any Covered Products in the United States that infringe claims 1, 5, 6, 16, 19, 20, 22, 24, or 26 of the '554 Patent;

(4) For purposes of disposition of any existing U.S. inventories of Covered Products, the ReST Respondents represent and warrant that no Covered Product presently is in inventory anywhere in the United States;

(5) The ReST Respondents expressly waive all rights to seek judicial review or otherwise challenge or contest the validity of the Consent Order;

(6) ReST will cooperate with and will not seek to impede by litigation or other means the Commission's efforts to gather information under Subpart I of the Commission's Rules of Practice and Procedure, 19 C.F.R. Part 210;

(7) Enforcement, modification, or revocation of the Consent Order will be carried out pursuant to Subpart I of the Commission's Rules of Practice and Procedure, 19 C.F.R. Part 210;

(8) Complainants and the ReST Respondents agree that the signing hereof is for settlement purposes only and does not constitute admission by the ReST Respondents that an unfair act has been committed;

(9) The Consent Order shall not apply with respect to any claim of any intellectual property right that has expired or been found or adjudicated invalid or unenforceable by the Commission or a court or agency of competent jurisdiction, provided that such finding or judgment has become final and non-reviewable;

(10) ReST will not seek to challenge the validity or enforceability of the '554 Patent in any administrative or judicial proceeding to enforce the Consent Order;

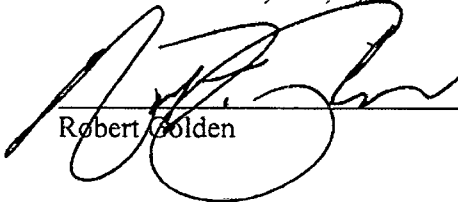
(11) The Consent Order shall have the same force and effect and may be enforced, modified, or revoked in the same manner as is provided in Section 337 of the Tariff Act of 1930

and Part 210 of the Commission's Rules of Practice Procedure, 19 C.F.R. Part 210, for other Commission actions, and the Commission may require periodic compliance reports pursuant to Subpart I of the Commission's Rules of Practice Procedure, 19 C.F.R. Part 210 to be submitted by the person entering into this Consent Order Stipulation; and

(12) There are no other agreements, written or oral, express or implied, between the ReST Respondents and the Complainants concerning the subject matter of this Investigation with respect to the '554 Patent.

IN WITNESS WHEREOF a duly authorized representative of the ReST Respondents has caused this Stipulation to be executed as of the date indicated below.

Responsive Surface Technology, LLC, and
Elements of Rest, Inc., by



Robert Golden

Signed this 2nd day of November, 2016.

ATTACHMENT

B

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C. 20436**

**Before the Honorable Theodore R. Essex
Administrative Law Judge**

In the Matter of

**CERTAIN AIR MATTRESS BED SYSTEMS
AND COMPONENTS THEREOF**

Inv. No. 337-TA-999

[PROPOSED] CONSENT ORDER

The U.S. International Trade Commission, on April 20, 2016 (81 Fed. Reg. 32344), instituted this Investigation under Section 337 of the Tariff Act of 1930, as amended (19 U.S.C. § 1337), based upon a Complaint filed by Complainants Select Comfort Corporation and Select Comfort SC Corporation, which asserts violations of Section 337 by Respondents Responsive Surface Technology LLC and Elements of Rest, Inc. (collectively “the ReST Respondents”) in the importation into the United States, the sale for importation, and the sale within the United States after importation of certain air mattress bed systems and components thereof of the ReST Respondents, as further described in paragraphs 19, 20, 21, and 23 of the Complaint (collectively, the “Covered Products”), that are alleged to infringe, inter alia, U.S. Patent No. 7,389,554 (“the ‘554 Patent”).

The ReST Respondents have executed a Consent Order Stipulation in which they agree to the entry of this Consent Order and to all waivers and provisions as required by the Commission's Rules of Practice and Procedure.

NOW, THEREFORE, the Commission issues the following Consent Order:

(1) Upon entry of this Consent Order, the ReST Respondents and their affiliated companies, parents, subsidiaries, or other related business entities, or their successors or assigns,

their principals, stockholders, officers, directors, employees, agents, licensees, distributors, controlled (whether by stock ownership or otherwise) and majority-owned business entities, successors, and assigns, or individuals acting on their behalf and with their authority (collectively, "ReST") shall not sell for importation, import into the United States, or sell in the United States after importation, directly or indirectly, or knowingly aid, abet, encourage, participate in, or induce the sale for importation, importation into the United States, or sale in the United States after importation of, any Covered Products that infringe claims 1, 5, 6, 16, 19, 20, 22, 24, and 26 of the '554 Patent, except under consent or license from Complainants.

(2) For purposes of disposition of any existing U.S. inventories of Covered Products, the ReST Respondents represent and warrant that no Covered Product presently is in inventory anywhere in the United States.

(3) ReST shall be precluded from seeking judicial review or otherwise challenging or contesting the validity of the Consent Order.

(4) ReST shall cooperate with and shall not seek to impede by litigation or other means the Commission's efforts to gather information under Subpart I of the Commission's Rules of Practice and Procedure, 19 C.F.R. Part 210.

(5) ReST shall not seek to challenge the validity or enforceability of the '554 Patent in any administrative or judicial proceeding to enforce the Consent Order.

(6) When the '554 Patent expires, this Consent Order shall become null and void.

(7) If any claim of the '554 Patent is held invalid or unenforceable by a court or agency of competent jurisdiction in a final and nonreviewable decision, no longer subject to appeal, this Consent Order shall become null and void as to such invalid or unenforceable claim.

(8) The Investigation is hereby terminated with respect to the '554 Patent as asserted against the ReST Respondents, provided, however, that enforcement, modification, or revocation of the Consent Order shall be carried out pursuant to Subpart I of the Commission's Rules of Practice and Procedure, 19 C.F.R. Part 210.

By order of the Commission.

Dated: _____

Lisa R. Barton, Secretary

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this day, true and correct copies of the foregoing documents were filed with the Commission and served by means indicated to the persons at the addresses below:

<p>The Honorable Lisa R. Barton Secretary U.S. INTERNATIONAL TRADE COMMISSION 500 E Street, SW Washington, DC 20436</p>	<p>Via EDIS and Hand Delivery</p>
<p>The Honorable Theodore R. Essex U.S. INTERNATIONAL TRADE COMMISSION 500 E Street, S.W., Room 317 Washington, D.C. 20436</p> <p>Tamara Foley Benjamin Richards Attorney Advisor U.S. INTERNATIONAL TRADE COMMISSION 500 E Street, S.W., Room 317 Washington, DC 20436</p>	<p>Via EDIS and Hand Delivery</p> <p>Via Email: Tamara.Foley@usitc.gov, Benjamin.Richards@usitc.gov</p>
<p><i>Counsel for Respondents American National Manufacturing, Inc., and Dires LLC d/b/a Personal Comfort Bed</i></p> <p>Tom M. Schaumberg Beau A. Jackson Michael R. Doman, Jr. ADDUCI, MASTRIANI & SCHAUMBERG, LLP 1133 Connecticut Avenue, N.W., 12th Floor Washington, DC 20036 Telephone: (202) 467-6300</p> <p>Mark A. Thornhill Kyle L. Elliott Kevin S. Tuttle Brian T. Bear SPENCER FANE LLP 1000 Walnut Street, Suite 1400 Kansas City, MO 64106 Telephone: (816) 474-8100</p>	<p>Via Email: ITC-999-AMN-1@adduci.com</p>

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abehraresh@mannavakang.com

Dated: November 4, 2016

By: /s/ Stacey L. Campbell
Stacey L. Campbell

PUBLIC CERTIFICATE OF SERVICE

I, Lisa R. Barton, hereby certify that the attached **ORDER 9** has been served by hand upon the following parties as indicated, on **November 18, 2016**



Lisa R. Barton, Secretary
U.S. International Trade Commission
500 E Street, SW, Room 112
Washington, DC 20436

On Behalf of Complainants Select Comfort Corporation and Select Comfort SC Corporation:

Kecia J. Reynolds, Esq.
PILLSBURY WINTHROP SHAW PITTMAN LLP
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Washington, DC 20036-3006

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- Via Express Delivery
- Via First Class Mail
- Other: _____

On behalf of Respondents: Responsive Surface Technology LLC and Elements of Rest Inc.

Eric G. Wright, Esq.
WRIGHT IP & INTERNATIONAL LAW PLLC
1101 New Hampshire Ave., NW, Suite 612
Washington, DC 20037

- ~~Via Hand Delivery~~
- Via Express Delivery
- Via First Class Mail
- Other: _____

**On Behalf of Respondents: American National Manufacturing, Inc.
and Dires, LLC, d/b/a Personal Comfort Bed**

Tom M. Schaumberg, Esq.
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- Via Express Delivery
- Via First Class Mail
- Other: _____