

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JUDGE GETTLER

MAGISTRATE JUDGE MASON

BEROL CORPORATION and
SANFORD, L.P.,

Plaintiffs,

-v-

BIC CORPORATION and BIC
U.S.A., INC.

Defendants.

02C 0559

JURY DEMAND

DOCKETED
JAN 24 2002

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs Berol Corporation ("Berol") and Sanford, L.P. ("Sanford"), by their attorneys, assert their complaint against BIC Corporation and BIC U.S.A., Inc. (collectively, "BIC") as follows:

Nature of Claims

1. By these claims, Berol and Sanford seek to redress BIC's infringement of Berol's and Sanford's patent rights. In particular, BIC has unlawfully used Berol's and Sanford's invention for an applicator for correction fluid in BIC's products, including BIC's Wipe-Out Plus™ products, in violation of Berol's and Sanford's rights.

The Parties

2. Berol Corporation is a Delaware corporation with its principal place of business in Freeport, Illinois.

3. Sanford, L.P. is an Illinois limited partnership with its principal place of business in Bellwood, Illinois.

4. Upon information and belief, defendant BIC Corporation is a New York corporation with its principal place of business in Milford, Connecticut and is doing business in the State of Illinois and this judicial district.

5. Upon information and belief, defendant BIC U.S.A., Inc. is a Delaware corporation with its principal place of business in Milford, Connecticut and is doing business in the State of Illinois and this judicial district.

Jurisdiction and Venue

6. This action arises under the Patent Act, 35 U.S.C. §271. This Court has original jurisdiction over the patent infringement claims in this action under 28 U.S.C. §§ 1331 and 1338(a).

7. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391(b)-(c) and 1400(b). The defendants reside in the Northern District of Illinois; a substantial part of the events giving rise to the claims in this suit occurred in the Northern District of Illinois.

BIC's Infringement of the '180 Patent

8. Berol and Sanford repeat and reallege the allegations of Paragraphs 1 through 7 as if fully set forth herein.

9. On November 6, 2001, the United States Patent and Trademark Office duly and legally issued United States Patent No. 6,312,180 (the "'180 patent"), called "Applicator for Correction Fluid," a copy of which is attached as Exhibit A. Berol is the assignee and owner of the '180 Patent, which remains valid and unexpired until

December 12, 2016. The `180 patent relates to, among other things, a novel design for a foam tip applicator instrument.

10. Sanford is the exclusive licensee of the `180 patent.

11. Defendants are not licensed or otherwise authorized by Berol or Sanford to make, use, offer for sale, or sell any product claimed in the `180 patent.

12. In violation of Berol's and Sanford's exclusive rights under the patent laws of the United States, Defendants have infringed and continue to infringe the `180 Patent by making, offering for sale, and selling correction fluid products that incorporate or embody the novel inventions described and claimed in the `180 Patent, such as BIC's Wite-Out Plus™ products.

13. By reason of Defendants' infringing activities, Berol and Sanford have suffered, and will continue to suffer, substantial damages, in an amount to be proven at trial.

14. Defendants' conduct also has caused, and will continue to cause, Berol and Sanford irreparable harm. Defendants' conduct is likely to continue unless it is enjoined from such conduct by this Court.

PRAYER FOR RELIEF

WHEREFORE, as a result of the unlawful acts of BIC set forth herein, Berol and Sanford pray for:

A. the entry of judgment that Berol is the owner of the `180 Patent and Sanford is its exclusive licensee;

B. the entry of judgment that Defendants have infringed, and continue to infringe, the `180 Patent;

C. an injunction prohibiting Defendants, and all persons in concert and participation with them, from making, importing, using, offering for sale, and selling

correction fluid products that incorporate or embody the inventions described and claimed in the '180 Patent;

D. an award of damages adequate to compensate Berol and Sanford for the infringement of the '180 Patent by Defendants, said damages being no less than the amount of a reasonable royalty for the infringement;

E. an award that trebles the amount of actual damages assessed against Defendants and in favor of Berol and Sanford pursuant to 35 U.S.C. § 284;

F. an award of reasonable attorney fees and costs pursuant to 35 U.S.C. § 285; and

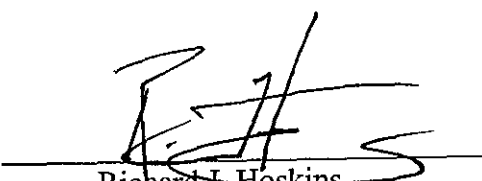
G. such other and further relief as the Court may deem just and proper.

JURY DEMAND

Berol and Sanford respectfully request a trial by jury as to all issues so triable.

Dated: January 23, 2002

By: _____


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EXHIBIT A



US006312180B1

(12) **United States Patent**
Panda(10) **Patent No.:** **US 6,312,180 B1**
(45) **Date of Patent:** ***Nov. 6, 2001**(54) **APPLICATOR FOR CORRECTION FLUID**(75) **Inventor:** **Aparajit Panda, Westborough, MA (US)**(73) **Assignee:** **The Gillette Company, Boston, MA (US)**(*) **Notice:** This patent issued on a continued prosecution application filed under 37 CFR 1.53(d), and is subject to the twenty year patent term provisions of 35 U.S.C. 154(a)(2).

Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 71 days.

This patent is subject to a terminal disclaimer.

(21) **Appl. No.:** **09/065,008**(22) **Filed:** **Apr. 23, 1998**(51) **Int. Cl.⁷** **A45D 33/00**(52) **U.S. Cl.** **401/130; 401/126**(58) **Field of Search** **401/122, 126, 401/130, 118, 121, 123, 124, 128**(56) **References Cited****U.S. PATENT DOCUMENTS**

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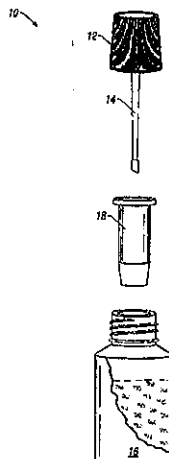
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Primary Examiner—David J. Walczak(74) **Attorney, Agent, or Firm**—Marshall, O'Toole, Gerstein, Murray & Borun(57) **ABSTRACT**

An applicator for a correction fluid includes a stem, an applicator tip including foam, and a flexor within the foam portion. The applicator preferably has a flexibility of at least 0.0005 inch of deflection per gram of force.

17 Claims, 3 Drawing Sheets

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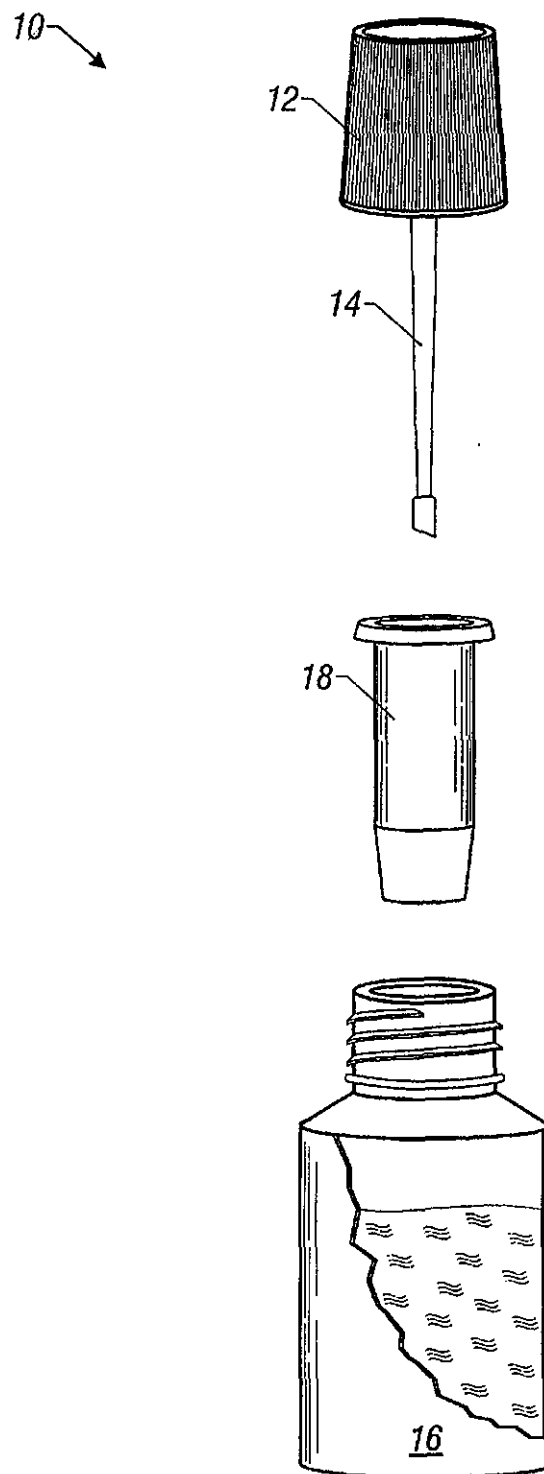


Figure 1

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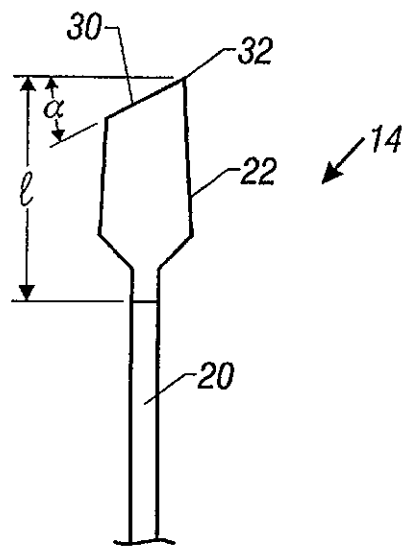


Figure 2

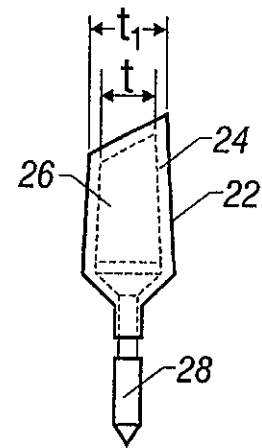


Figure 3

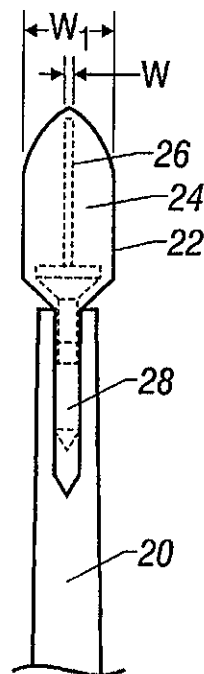


Figure 4

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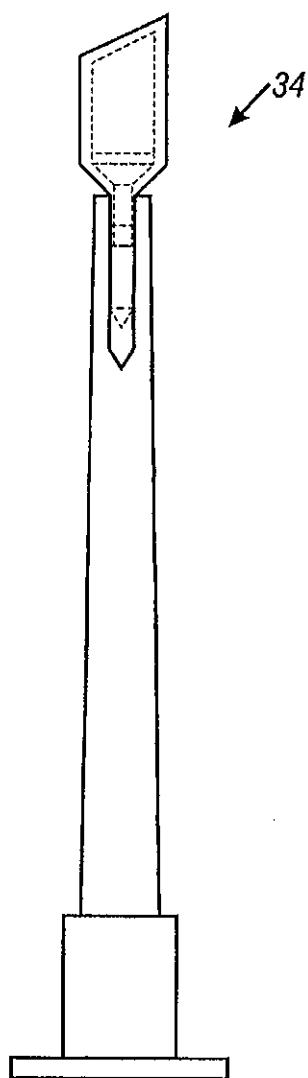


Figure 5

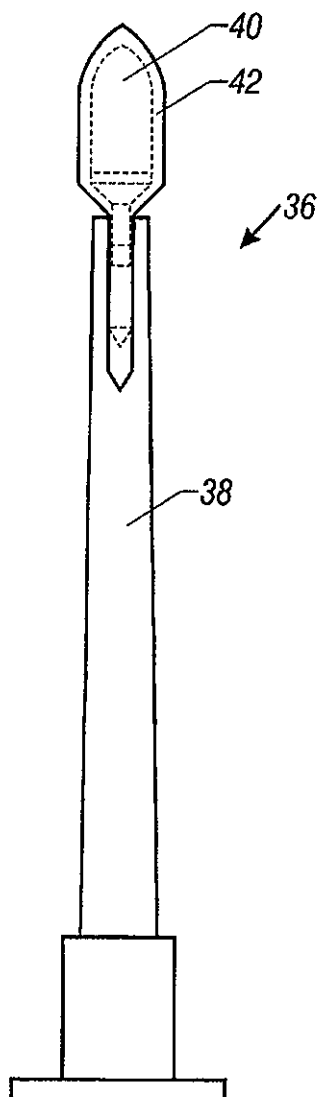


Figure 6

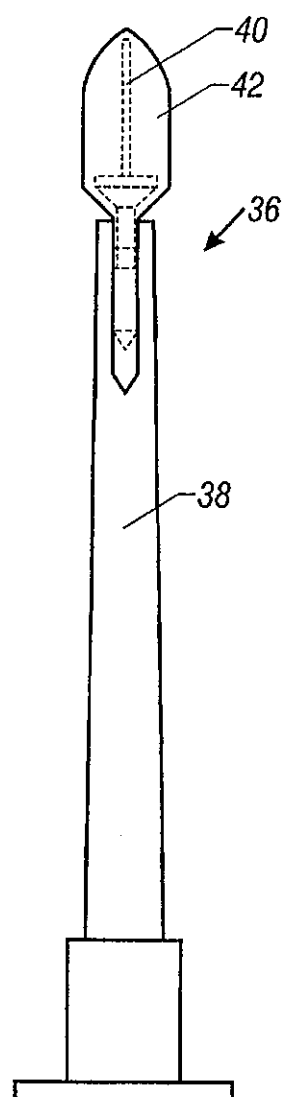


Figure 7

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APPLICATOR FOR CORRECTION FLUID**BACKGROUND OF THE INVENTION**

The invention relates to applicators for correction fluids.

Correction fluids are used for correcting handwritten, typewritten or photocopied markings on paper. Generally, correction fluids are applied to a paper surface in liquid form. After application, the fluids harden to a film which can effectively cover erroneous markings on the surface and can receive a corrected marking. Correction fluids typically contain a resin that provides the flexible film, and an opacifying pigment, usually titanium dioxide, dispersed in a liquid. The liquid may be water or an organic solvent.

Correction fluids are often supplied in a small container with an applicator brush attached to the cap through a stem. A user unscrews the cap from the container and withdraws the brush loaded with correction fluid. The user then contacts the erroneous marking with the brush, and correction fluid is transferred to the substrate to cover the marking.

SUMMARY OF THE INVENTION

The invention relates to an applicator that can be used to apply correction fluid. The applicator preferably includes a stem, an applicator tip including foam, and preferably a flexible material, i.e., a flexor, within the tip. The applicator is easy to use and preferably can be inserted into a correction fluid container in the same general manner as brush applicators. The applicator provides an even laydown of correction fluid on a substrate, resulting in good correction quality. The applicator has good durability and facilitates precise correction.

In one aspect, the invention relates to an applicator, including a stem and an applicator tip including foam, having a flexibility of at least 0.0005 inch of deflection per gram of force, preferably at least 0.002 inch of deflection per gram of force.

In another aspect, the invention features an applicator, including a stem and an applicator tip including foam, having an angled chisel-shaped application surface for applying correction fluid to a substrate.

In another aspect, the invention relates to an applicator including a stem and an applicator tip including a quenched foam. By quenched foam, it is meant a foam that is reticulated (substantially all membranes have been removed to make it open-celled) by chemical methods.

In another aspect, the invention relates to an applicator including a stem and an applicator tip including foam having an average pore size of between 20 ppi (pores per linear inch) and 130 ppi.

The invention further relates to correction fluid products, including a body defining a reservoir and having an opening. The reservoir includes a correction fluid, and the applicator is inserted through the opening so that the portion is in contact with the correction fluid. Preferably, the product also includes an insert through the opening, through which the applicator passes during use. Preferred inserts include a narrowed neck portion that removes excess correction fluid when the applicator tip is withdrawn from the reservoir.

The invention further relates to an applicator having an applicator tip including foam, a correction fluid reservoir, including correction fluid, from which the correction fluid is fed to the applicator tip. The applicator has a flexibility of at least 0.0005 inch of deflection per gram of force. The applicator may also include a removable enclosure (e.g., a cap) for the tip.

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Other features and advantages of the invention will be apparent from the description of the preferred embodiment thereof, and from the claims.

BRIEF DESCRIPTION OF THE DRAWING

FIG. 1 is an exploded view of a correction fluid container including a correction fluid;

FIG. 2 is a side view of the end portion (including the applicator tip) of the foam applicator in FIG. 1;

FIG. 3 is a side view of the applicator tip removed from the applicator in FIG. 2, with the portion of the flexor within the tip shown in broken lines;

FIG. 4 is a front view of the end portion of the foam applicator tip in FIG. 3;

FIG. 5 is a side view of a second applicator, with the flexor shown in broken lines;

FIG. 6 is a side view of a third applicator, with the flexor shown in broken lines; and

FIG. 7 is a rear view of the applicator in FIG. 6.

DESCRIPTION OF THE PREFERRED EMBODIMENTS

Referring to FIGS. 1-4, a correction fluid container 10 includes a cap 12, an applicator 14, a body 16 including a correction fluid reservoir, and an insert 18.

Applicator 14 includes a stem 20, and an applicator tip 22. The applicator tip includes a foam portion 24 enclosing a flexor 26. The applicator has a flexibility of at least 0.0005 inch of deflection per gram of force, preferably at least 0.002 inch of deflection per gram of force, measured as described below. The flexibility of the applicator depends on a number of factors, including the stiffness of the stem; the composition, length, width, and thickness of the flexor; and the chemical composition and thickness of the foam portion.

The stiffness of the stem depends on the composition, length, and diameter of the stem. Generally, the less stiff the stem, the more flexible the applicator. Stems composed of softer materials are less stiff than stems composed of harder materials, and longer stems are less stiff than shorter stems. Stems may be made of, for example, polymeric materials such as a low density and/or high density polyethylene or polypropylene. The stem may have a length, for example, of between 2 cm and 15 cm, and preferably between 2 cm and 10 cm. It also may have a diameter of between, for example, 0.1 cm and 2 cm, and preferably between 0.2 cm and 0.8 cm. Stem 20 has a length of 4.1 cm and a diameter of 0.31 cm.

Flexor 26 includes an extension 28 that fits into the hollow end of stem 20.

Generally, the softer the foam and the thinner the applicator tip the greater the flexibility of the foam applicator. The foam may be, for example, an open cell foam having a pore size, for example, of between 20 ppi and 130 ppi, preferably between 80 ppi and 120 ppi, and may be, for example, a polyether/polyurethane, polyester/polyurethane, polyether, or polyester foam. The foam can have a density, for example, in the range of 1.6 lb/ft³ to 15.0 lb/ft³, a compression deflection (CLD) of 25% R (radius) at (0.05-5.0) psi and a CLD of 65% at (0.2-10) psi. A preferred foam is a quenched polyester polyurethane foam having a density of 1.85 lb/ft³, a pore size of 80 ppi to 120 ppi, a CLD of 25% R at 0.25 psi, and a CLD of 65% R at 0.45 psi.

The foam portion (including the enclosed flexor) may have a thickness (t₁), for example, of between 0.16 cm and 1.27 cm, a length (l) of between 0.3 cm and 2.0 cm, and a

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width (w) between 0.2 cm and 1.0 cm. Foam portion 24 has a thickness (t₁) (at midpoint) of about 0.44 cm, and a length (l) of about 0.9 cm. Foam portion 24 is tapered and has a thickness at its base of about 0.44 cm and a thickness towards its tip of about 0.34 cm.

Generally, the softer the composition of the flexor the greater the flexibility of the foam applicator. The flexor may be composed, for example, of a composite of linear low density polyethylene and a thermoplastic olefin having a very high softness and low modulus (e.g., Adflex KS-359P, available from Mobil), low density polyethylene, high density polyethylene, polypropylene, or nylon. In addition, as a general rule, thinner flexors provide more flexible foam applicators. The flexor may have, for example, a width (w) of between 0.02 cm and 0.15 cm, and a thickness (t) of between 0.1 cm and 1.0 cm. Flexor 26 has a width (w) of 0.06 cm. Flexor 26 is tapered but has a thickness of about 0.25 cm at its mid-point.

Foam applicator 14 has an angled chisel-shaped applicator surface 30 that includes a point 32. The angle (α in the Figure) preferably is between 15° and 60° (e.g., 30°). The long applicator side surface can be used to apply correction fluid over words; the point or straight edge of 32 allows a user to easily apply correction fluid to individual letters.

Insert 18 may be composed, for example, of a high density polyethylene. The insert has a narrowed neck region 30 that may have an inside diameter of between 3.0 mm and 5.0 mm (e.g., 3.8 mm), and may have a length of between 5 mm and 40 mm (e.g., 25 mm). When portion 24 is removed (wiped off) from the correction fluid reservoir for use, excess correction fluid is removed by narrowed neck 34. When portion 24 is reinserted into the fluid reservoir after use, any excess correction fluid that comes off portion 24 during reinsertion generally is accommodated by the portion of insert 18 above the narrowed neck, thus avoiding spillage of correction fluid.

Applicator 10 may be used with organic solvent-based or water-based correction fluids. In addition to the liquid vehicle, correction fluids may include an opacifying agent such as titanium dioxide, a film-forming polymer, and various other standard ingredients. Correction fluids may have a viscosity, for example, of between 10 cps and 2000 cps, preferably between 30 cps and 1000 cps, at 20 rpm using a Brookfield Viscometer. Preferred correction fluids are described in, for example, U.S. Pat. Nos. 5,199,976 and 5,306,755, which are incorporated by reference herein.

Referring to FIG. 5, an applicator 34 has a design similar to applicator 14. Applicator 34, unlike applicator 14, does not have a tapered foam portion or tapered flexor.

Referring to FIGS. 6 and 7, an alternative applicator 36 has a spear-shaped tip and includes a stem 38, a flexor 40, and a foam portion 42.

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The flexibility of an applicator can be measured using an Instron Model 1122 Compression Tester. The capped end of the applicator is attached to a fixed stand, having a rotating fixture to vary the angle of attachment. The angle is set at 40° so that the foam-tip is just underneath the vertical cylinder (probe) of the tester, having a diameter of 15 cm. This probe is then moved downwards slowly at a controlled rate of 0.13 cm/min while pressing the foam-tip during its downward movement. The force generated by the probe to deflect the foam-tip and the actual deflection of the foam-tip were continually monitored and transmitted to a recorder for recording on a X-Y graph. The flexibility (calculated from the graph) corresponds to the ratio of deflection distance to the applied force, i.e., the slope of deflection vs. applied force graph. The measurements are conducted at various deflection distances, e.g., 0.05", 0.1", 0.15", 0.20" and 0.25".

The flexibility of 12 applicators was measured according to this procedure. The results are shown below in Tables 1 and 2. "Spear" in the applicator in FIGS. 6 and 7; "Chisel #1" is the applicator in FIGS. 1-4; and "Chisel #2" is the applicator in FIG. 5.

TABLE 1

Applicator Tested				
Design	Code	Flexor	Foam ²	Stem
Spear	G	Polypropylene	3/16" Zapped ³	HDPE
Spear	Z	Polypropylene	3/16" Ultra Fine ⁴	HDPE
Chisel #1	A	100% LDPE	3/16" Quenched ⁵	LDPE
Chisel #1	V	100% Adflex ¹	3/16" Quenched	LDPE
Chisel #1	W	75% Adflex/25% LLDPE	3/16" Quenched	LDPE
Chisel #1	X	50% Adflex/50% LLDPE	3/16" Quenched	LDPE
Chisel #2	B	100% Polypropylene	3/16" Quenched	HDPE
Chisel #2	C	100% Adflex	3/16" Quenched	HDPE
Chisel #2	D	Natural Linear LDPE (LLDPE)	3/16" Quenched	LDPE
Chisel #2	E	50% Adflex/50% LLDPE	3/16" Quenched	HDPE
Chisel #2	F	50% Adflex/50% LLDPE	3/16" Quenched	LDPE
Chisel #2	Y	50% Adflex/50% LLDPE	3/16" Quenched	LDPE

¹Purchased from Montell Polyolefins.

²The number is the thickness and the type of foam.

³SIF ® Zapped (reticulated by thermal method), purchased from Foamex International of Eddystone, PA.

⁴SIF ® Ultra-Fine, a high density (6.0 lb/ft³), fine pore (100-110 ppi) fully open cell polyester-polyurethane foam purchased from Foamex.

⁵SIF ® Quenched (reticulated by chemical method), available from Foamex.

TABLE 2

Flexibility (inch of deflection per gram of force applied)												
De- flec- tion, In- ches	A	B	C	D	E	F	G	V	W	X	Y	Z
0.05	0.002776	0.002778	0.02	0.007143	0.005263	0.018182	0.001667	0.005	0.011111	0.005882	0.007143	0.001316
0.1	0.003571	0.001563	0.016667	0.005882	0.003333	0.014815	0.001802	0.007273	0.012903	0.005128	0.005128	0.001695
0.15	0.003846	0.001785	0.0125	0.006122	0.003614	0.012766	0.002	0.006522	0.013333	0.006	0.00625	0.001829

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TABLE 2-continued

De- flec- tion, In- ches	Flexibility (inch of deflection per gram of force applied)											
	A	B	C	D	E	F	G	V	W	X	Y	Z
0.2	0.004167	0.001852	0.011765	0.006557	0.00354	0.011429	0.001869	0.005479	0.0125	0.006452	0.007018	0.001942
0.25	0.004587	0.001923	0.008065	0.00625	0.004237	0.008403	0.001437	0.004	0.006757	0.005051	0.007143	0.001429

Although the flexibility of the examples were measured at various deflection distances, "flexibility" (as that term is used in the claims) should be measured at a deflection distance of 0.05".

Other embodiments are within the claims.

What is claimed is:

1. A correction fluid product, comprising
a body including a reservoir and an opening,
an applicator including a stem, and an applicator tip,
mounted on said stem, comprising an open cell
polyurethane/polyester foam, the applicator having a
flexibility of at least 0.0005 inch of deflection per gram
of force, and
a cap, upon which said stem is mounted so that during
storage of the product said stem extends through said
opening into said reservoir and said cap seals said
opening.
2. The product of claim 1 wherein the stem has a length
between 2 cm and 15 cm.
3. The product of claim 1 wherein the foam comprises a
quenched foam.
4. The product of claim 1 wherein the foam is stable to
organic solvents.
5. The product of claim 1 wherein the applicator tip has
an angled chisel-shaped edge.
6. The product of claim 1 wherein the applicator tip has
a thickness of between 0.16 cm and 1.27 cm.
7. The product of claim 1 wherein the applicator tip
further comprises a flexor within the foam.
8. The product of claim 1 wherein the correction fluid
includes organic solvent.

9. The product of claim 1 wherein the correction fluid has
a viscosity of between 10 cps and 2000 cps.

10. The product of claim 1 wherein the foam portion has
an average pore size of between 20 ppi and 130 ppi.

11. The correction fluid product of claim 1, wherein said
body comprises a reservoir-containing portion, and a neck
portion having a relatively smaller diameter than said
reservoir-containing portion.

12. The correction fluid product of claim 11 wherein said
cap contacts an outer surface of said neck portion in threaded
engagement.

13. The correction fluid product of claim 1 wherein said
foam has a density of from about 1.6 lb/ft³ to 15.0 lb/ft³.

14. A method of applying a correction fluid to a paper
surface to cover an ink marking using an applicator having
a flexibility of at least 0.0005 inch of deflection per gram of
force and including a stem and an applicator tip including an
open cell polyurethane/polyester foam, comprising loading
correction fluid onto the applicator tip, and contacting the
paper surface with the applicator tip to transfer correction
fluid over the ink marking.

15. The method of claim 14 wherein the applicator further
includes a flexor within the foam.

16. The method of claim 14, wherein said applicator
includes a cap, on which said stem is mounted, and a user
holds the cap while contacting the paper surface.

17. The method of claim 14 wherein said foam has a
density of from about 1.6 lb/ft³ to 15.0 lb/ft³.

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Civil Cover Sheet

Page 1 of 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

JUDGE GETTLEMAN

Civil Cover Sheet

MAGISTRATE JUDGE MASON

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the Northern District of Illinois.

Plaintiff(s): BEROL CORPORATION and SANFORD,
L.P.

Defendant(s): BIC CORPORATION and BIC U.S.A., INC.

County of Residence: Stephenson

County of Residence:

Plaintiff's Atty: Richard J. Hoskins
SCHIFF HARDIN & WAITE
6600 Sears Tower, Chicago, IL 60606
312-258-5500

Defendant's Atty:

02C 0559

DOCKET
JAN 24II. Basis of Jurisdiction:

3. Federal Question (U.S. not a party)

III. Citizenship of Principle Parties
(Diversity Cases Only)

Plaintiff:- N/A

Defendant:- N/A

IV. Origin :

1. Original Proceeding

V. Nature of Suit:

830 Patent

VI. Cause of Action:

Patent infringement, pursuant to 35 U.S.C. 271

VII. Requested in Complaint

Class Action: No

Dollar Demand: Damages to be proven at trial

Jury Demand: Yes

VIII. This case **IS NOT** a refiling of a previously dismissed case.Signature: SP MontmanDate: Jan. 23, 2002

If any of this information is incorrect, please go back to the Civil Cover Sheet Input form using the *Back* button in your browser and change it. Once correct, print this form, sign and date it and submit it with your new civil action. **Note: You may need to adjust the font size in your browser display to make the form print properly.**

Revised: 06/28/00

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

Eastern Division

DOCKETED
JAN 24 2002

In the Matter of

BEROL CORPORATION and SANFORD, L.P.,
Plaintiffs,

v.

BIC CORPORATION and BIC U.S.A., INC.,
Defendants.

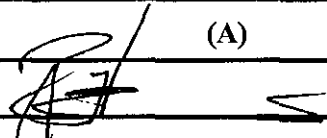
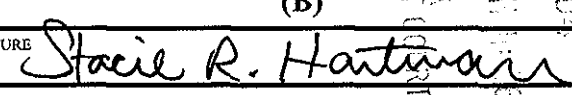
MAGISTRATE JUDGE MASON

Case Number:

02C 0559

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR

PLAINTIFFS

(A)	(B)
SIGNATURE 	SIGNATURE 
NAME Richard J. Hoskins	NAME Stacie R. Hartman
FIRM SCHIFF HARDIN & WAITE	FIRM SCHIFF HARDIN & WAITE
STREET ADDRESS 6600 Sears Tower, 233 South Wacker Drive	STREET ADDRESS 6600 Sears Tower, 233 South Wacker Drive
CITY/STATE/ZIP Chicago, Illinois 60606-6473	CITY/STATE/ZIP Chicago, Illinois 60606-6473
TELEPHONE NUMBER (312) 258-5500	TELEPHONE NUMBER (312) 258-5500
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 1266063	IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6237265
MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
	DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
(C)	(D)
SIGNATURE	SIGNATURE
NAME	NAME
FIRM	FIRM
STREET ADDRESS	STREET ADDRESS
CITY/STATE/ZIP	CITY/STATE/ZIP
TELEPHONE NUMBER	TELEPHONE NUMBER
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DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>