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02 April 2018

Chris Gajewski
Bryn Mawr Orthodontic Lab
12 Elliot Avenue, PO Box 900
Bryn Mawr, PA 19010

Re: Notice of Patent

Dear Sir:

I represent Mr. Loren Adell and Mr. Michael Adell who are the owners of Trigroup Technologies, Ltd. of Sunnyvale, TX, and of U.S. Patent No. 9,717,568 "DENTAL DEVICE FABRICATION ON A 3-D PRINTED ARCH MODEL." A copy is enclosed.

It is my understanding that you know of the Adells' company and the Adells' patent. I am also informed that you have used their Siliform product as separators on 3D printed arch models for dental appliance fabrication, and that you have also used products other than Siliform as separators on 3D printed arch models for dental appliance fabrication.

Please be advised that the purchase of Siliform conveys, to the original purchaser only, a personal non-transferable right to use ONLY the original proprietary formulation of the contents of the container without any adulteration of the formulation by purchaser in the patented method of US Pat. No. 9,717,568, as a barrier on a 3D printed dental arch model for the purpose of rendering the material of an intra-oral device being fabricated on the model immune to chemical reaction with the material of the 3D printed dental arch model. The purchase grants no right under any other intellectual property of seller or owners of the patent or any third party. Your uses of Siliform on 3D printed dental arch models is licensed, but your uses of non-Siliform on such models are not.

Uses of non-Siliform products on 3D printed arch models for dental appliance fabrication are acts of direct infringement of the Adells' patent as defined in Title 35, Section 271(a) of the U.S. Code. Recommending other laboratories to fabricate dental appliances by using products other than Siliform as separators on 3D printed dental arch models would be

inducing infringement of the Adells' patent as defined in Title 35, Section 271(b) of the U.S. Code. Both types of infringement, direct and inducing, made with disregard of the Adells' patent, would be considered willful under Title 35, Section 284 of the U.S. Code and therefore render you liable to the patent owners not only for their actual damages due to lost sales of Siliform, but also for up to as much as a trebling of such damages.

The patent owners therefore demand that you immediately cease and desist using non-Siliform products as separators on 3D printed arch models for dental appliance fabrication. If you have recommended non-Siliform products to others for use as separators on 3D printed arch models for dental appliance fabrication, the patent owners suggest that in order to limit your own liability for having induced infringement, you promptly inform them that use of non-Siliform products as separators on 3D printed dental arch models for dental appliance fabrication must be discontinued.

For showing your compliance with the above demands, please mail me within 7 days of your receipt of this correspondence, at the letterhead address, your written assurance that you have 1) ceased using non-Siliform products as separators on 3D printed arch models for dental appliance fabrication and 2) notified other laboratories to which you may have recommended that non-Siliform separators be used on 3D printed arch models for dental appliance fabrication, that they must discontinue use of such separators on 3D printed arch models for dental appliance fabrication. Your compliance with these demands does not forgive your past acts of infringement.

Yours is not the only orthodontic laboratory which is being put on notice of infringement of the Adells' patent by demand letters like this one. When assurances, like the ones requested from you, are not timely received from the notified laboratory, it is assumed that the laboratory does not intend to resolve this matter without legal process. When that happens, a second letter which contains that assumption is mailed to the laboratory to emphasize the seriousness of this matter. If the recipient chooses to continue to ignore the matter, it does so at its own peril.

Sincerely yours,


George L. Bolter

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Re: Adell U.S. Patent No. 9,717,568

Dear Sir:

Having failed to receive any response from you or your attorney to my 02 April letter, I assume that you do not intend to resolve this matter without legal process, as explained in that letter.

Since 02 April I have been furnished new information which shows your contempt for the Adells' right to enforce their patent by your deliberate disparagement of the Adells personally, their business, and their patent. I have advised my clients that your numerous acts of vilification contained in recorded remarks at the DLAT Conference in early April and in postings on your AOLP Facebook page ("patent whores" for one example) are legally actionable as causes of action which are independent from, and additional to, your acts of patent infringement.

Because your remarks at the DLAT Conference occurred under the auspices of the DLAT, I have mailed letters to each the five members of the DLAT Executive Board regarding your behavior. If you ask your attorney, I would expect him/her to advise you that my notices to infringers on behalf of the Adells are assertions of the patent owners' lawful right to exclude others from making and using, anywhere in the United States, the invention protected by their patent. Those letters are not, as you imprudently state, "crap".

It is clear that you do not correctly understand the protection provided to the Adells' by their patent. I suggest you have your attorney explain the Adell patent claims to you so that you can properly comprehend the subject matter which the patent protects. Continued naive statements inferring the separator process "has been around for 100 years", is telling your Facebook group that it, like you, has the right to disrespect the Adell patent. You might also want to ask your attorney to explain the meaning of "patent troll", "slander", and "libel" as those descriptors are generally understood in the legal community.

Bryn Mawr Orthodontic Lab
03 May 2018

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I hope that you would recognize the position that you have put yourself and your company in, and I encourage you to promptly comply with my original request for written assurances. If I fail to receive those assurances by May 17, I will assume that you do not intend to provide them. If the Adells are left with no choice but to seek legal redress they will present to the court all previous and current facts when seeking actual and exemplary damages and all recoverable attorneys' fees and costs.

Sincerely yours,


George L. Boller