



IN THE SUPREME COURT OF THE STATE OF DELAWARE

REINHARD WARNKING,
and SOUND INTERVENTIONS,
INC., a Delaware corporation,

Defendants-below/Appellants,

v.

RECOR MEDICAL INC.,
a Delaware corporation,

Plaintiff-below/Appellee.

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: No. 517, 2013
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: Appeal from the Court of Chancery
: of the State of Delaware, in C.A. No.
: 7387-VCN
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APPELLANTS' REPLY BRIEF

November 27, 2013

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REPLY STATEMENT

Defendants Reinhard Warnking (“Mr. Warnking”) and Sound Interventions, Inc. (“SII”) (collectively, “Defendants”) reply to Appellee, ReCor Medical, Inc. (“ReCor”) Answering Brief as follows:

- Defendants agree that this is a breach of contract action regarding whether Mr. Warnking breached the Employee Non-Disclosure Non-Competition and Invention Assignment Agreement (“IAA”). In fact, Defendants’ arguments have solely focused on the contractual standard at issue – whether the Invention¹ contains Proprietary Information related to the business of ProRhythm.
- The idea of using ultrasound for renal denervation was not Mr. Warnking’s idea; it was a publically known concept and it was disclosed to ProRhythm and Mr. Warnking by third parties. Therefore, it cannot be Proprietary Information of ProRhythm.
- Mr. Warnking did not have to assign to ProRhythm any idea he conceived of while at ProRhythm. Rather, an idea had to be Proprietary Information related to the business of ProRhythm to fall within the purview of the IAA.
- Assuming everything in the emails relied upon by ReCor is relevant and taking every negative inference concerning such emails, the emails still cannot prove that Mr. Warnking breached the IAA because the content of the emails did not include Proprietary Information related to the business of ProRhythm; they merely were discussing an idea already in the public domain.
- The inherent characteristics of the Invention and the relevant technology demonstrate that the Invention does not contain any Proprietary Information related to the business of ProRhythm.

¹ The Invention is defined as the provisional ‘429 patent application.

- The Court of Chancery's award of the patent applications, an injunction and attorney's fees was inequitable because Defendants are prohibited from utilizing technology that is not Proprietary Information related to the business of ProRhythm.
- ReCor failed to meet its burden of proof in demonstrating that Mr. Warnking breached his fiduciary duties to ProRhythm as it presented no evidence at trial to support this claim.

ARGUMENT

I. THE COURT OF CHANCERY'S DECISION WAS CLEARLY ERRONEOUS BECAUSE THE IDEA OF USING ULTRASOUND FOR RENAL DENERVATION WAS NOT PROPRIETARY INFORMATION RELATED TO THE BUSINESS OF PRORHYTHM AND THEREFORE MR. WARNKING DID NOT BREACH THE IAA²

A. ReCor did not apply the plain terms of the IAA in its Answering Brief

Defendants posed the following question in their Opening Brief: “[d]id the evidence presented at trial prove that Mr. Warnking’s Invention contained Proprietary Information related to the business of ProRhythm?”³ ReCor claims that this is the “wrong question” because “[t]his is not a patent case.”⁴ ReCor’s assertion is wrong – the question presented by Defendants is based entirely upon the standard set forth in the IAA. Specifically, in relevant part, the IAA provides that:

If at any time or times during my employment I shall either alone or with others make, conceive, discover or reduce to practice any Proprietary Information whatsoever or any interest therein (whether or not patentable or registrable under copyright or similar statutes or subject to analogous protection therein called “Developments”) that i) relates to the business of the Company... such Developments and the benefits thereof shall immediately become the sole and absolute property of the Company ... ⁵

² Defendants preserved the issue of whether the Invention was an asset of ProRhythm in the Pre-Trial Order and Stipulation. See B-093 (Pre-Trial Order and Stipulation at 2).

³ Defs. Corrected Opening Br. at 8.

⁴ ReCor’s Ans. Br. at 2.

⁵ A-35.

Thus, the Defendants properly framed the pertinent issue on appeal. To establish that the Invention was an asset of ProRhythm, ReCor was required to demonstrate that Mr. Warnking: 1) made, conceived, discovered or reduced to practice, 2) Proprietary Information, 3) related to the business of ProRhythm.⁶ ReCor's Answering Brief does not analyze the IAA or explain how ReCor satisfied each element of the IAA. Rather, ReCor states that "[t]he contract did not require an invention, nor any testing; conception alone was sufficient to make the idea a ProRhythm asset."⁷ ReCor's premise is unsupported by the terms of the IAA and the evidence presented to the Court of Chancery.

1. The idea of using ultrasound for renal denervation is not ProRhythm's Proprietary Information

The idea of using ultrasound for renal denervation was a concept made public first by Ardian and was brought to the attention of ProRhythm by Dr. Bonan, then a ProRhythm independent researcher.⁸ The use of ultrasound for renal denervation was also brought to ProRhythm's attention, by a former employee, Eugene Jung ("Mr. Jung"), who had also discussed the concept with Dr. Nakagawa.⁹ At the time, using ultrasound for renal denervation was a topic of conversation among those in the industry, further demonstrating that it is not Proprietary Information of ProRhythm. Thus, ReCor's assertion that "only one

⁶ A-35.

⁷ ReCor's Ans. Br. at 6-7.

⁸ A-92 – A-120. Dr. Bonan is now a ReCor investor and scientific advisor (A-605).

⁹ A-207.

conclusion results: ultrasound renal denervation was conceived at ProRhythm ...”¹⁰ does not follow from the evidence in the record.

ReCor’s reliance on a series of emails by and among ProRhythm employees and researchers is likewise misplaced. The emails do not show that Mr. Warnking, or any other person affiliated with ProRhythm, conceived of the idea to use ultrasound for renal denervation; in fact they demonstrate the opposite. Because the use of ultrasound for renal denervation was a publically-known concept, Mr. Warnking was free to discuss any idea he may have had about that concept while he was at ProRhythm without ProRhythm obtaining a contractual right to those ideas; ProRhythm’s contractual rights did not trigger until Mr. Warnking conceived of Proprietary Information related to the business of ProRhythm.¹¹

Further, not one single email concerns, relates to or even insinuates the inventive concept behind the Invention.¹² ReCor avoids confronting this point in its Answering Brief, focusing instead on whether Mr. Warnking conceived of the idea of ultrasound renal denervation. However, the definition of Proprietary Information is very specific and does not include anything in the public domain.¹³

¹⁰ ReCor’s Ans. Br. at 22.

¹¹ In fact, the idea of using ultrasound for renal denervation, as opposed to radio frequency, which was Ardian’s primary focus, was not a novel concept either. It was common knowledge and practice in the industry to contemplate different energy sources to be utilized (see AR-8 – AR-14).

¹² Defs.’ Corrected Opening Br. at 17-18.

¹³ Pursuant to the IAA, Proprietary Information is defined as:

At trial, ReCor was required to prove that whatever was in Mr. Warnking's mind while he was at ProRhythm was one of the enumerated items contained in the definition of Proprietary Information; an idea that was in the public domain clearly could not be one of them.

Additionally, ReCor's argument that the renal denervation portion of the June 27 study conducted by Dr. Nakagawa is owned by ProRhythm is also belied by the facts.¹⁴ The terms of the contract between the University of Oklahoma and ProRhythm (the "Research Agreement"¹⁵) refutes the Court of Chancery's finding that the renal denervation portion of the June 27 study is Proprietary Information of ProRhythm.¹⁶ Conveniently, ReCor has not addressed that issue.

Intellectual Property Rights (as hereinafter defined), trade secrets or proprietary or confidential information respecting inventions, products, product plans, designs, drawings, sketches, marketing and other plans, methods, know-how, techniques, technology, systems, characters, processes, strategies, software programs, works of authorship, customer lists, user lists, vendor lists, content provider lists, supplier lists, pricing information, project notes, memoranda, reports, lists, records, specifications, software programs, data, documentation budgets, plans, projections, forecasts, financial information and proposals in whatever form, tangible or intangible or other materials of any nature relating to any matter within the scope of the business of the Company or concerning any of the dealings or affairs of the Company. (A34).

Intellectual Property Rights are further defined as:

all industrial and intellectual property rights, including, without limitation, patents, patent applications, patent rights, trademarks, trademark applications, trade names, service marks, service mark applications, copyrights, copyright applications or registrations, databases, algorithms, computer programs and other software, know-how, trade secrets, proprietary processes and formulas, inventions, trade dress, logos, design and all documentation and media constituting, describing or relating to the above. (A34).

¹⁴ Defs.' Opening Br. at 18.

¹⁵ A-41 – A-47.

¹⁶ Opinion at 14.

Accordingly, ReCor failed to meet its burden of proving that the idea of using ultrasound for renal denervation was Proprietary Information and therefore the Court of Chancery's holding was clearly erroneous and must be reversed.

2. Renal denervation is not related to the business of ProRhythm

ReCor does not dispute that renal denervation was not, and was never contemplated to be, the business of ProRhythm. ReCor fails to address this element in its Answering Brief, relying instead on the incorrect assumption that Mr. Warnking's conception of "ultrasound renal denervation" is enough to prove that he breached the IAA.¹⁷

There is no dispute that ProRhythm was engaged in the field of mitral valve repair. Mitral valve repair is related to the heart and is fundamentally different than renal denervation. Even ReCor's own witnesses (who previously worked at or with ProRhythm) were not aware of any renal denervation work done at ProRhythm.¹⁸ There is no evidence in the record to support a finding that renal denervation was related to the business of ProRhythm.

Further, because the renal denervation portion of the June 27 study was not the property of ProRhythm,¹⁹ it could not have brought renal denervation within

¹⁷ ReCor's Ans. Br. at 22.

¹⁸ A-613 – A-614; A-605 – A-607.

¹⁹ A-41.

the scope of business of ProRhythm.²⁰ Thus, ReCor has failed to establish that renal denervation was related to the business of ProRhythm.

B. The IAA did not require Mr. Warnking to assign “ideas” to ProRhythm

As explained above, Mr. Warnking expressly agreed to assign any Proprietary Information made, conceived, discovered or reduced to practice by him while at ProRhythm that related to the business of ProRhythm.²¹ The IAA does not provide that any “idea” conceived of by Mr. Warnking belongs to ProRhythm. Thus, ReCor’s statements that “[i]n the IAA, Warnking expressly assigned to ProRhythm any idea that he conceived of” and that “[t]he contract did not require an invention, nor any testing; conception alone was sufficient to make the idea a ProRhythm asset”²² do not reflect the actual language of the IAA.

In fact, there is no mention of “ideas” in the IAA. However, Yong Zou’s (“Mr. Zou”) invention assignment agreement with ProRhythm did require the assignment of “ideas” to ProRhythm.²³ Thus, there is a distinct and crucial difference between conception of an idea and conception of Proprietary Information (the definition of which does not include ideas).

²⁰ Opinion at 43.

²¹ A-35.

²² ReCor’s Ans. Br. at 6.

²³ AR-1 – AR-7.

The only evidence presented at trial concerned general discussions about the idea of using ultrasound for renal denervation.²⁴ Under the terms of the IAA, Mr. Warnking could discuss the idea of using ultrasound for renal denervation all he wanted without any obligation to ProRhythm. Mr. Warnking's obligations to ProRhythm under the IAA were triggered only upon conceiving of Proprietary Information related to the business of ProRhythm. The evidence presented at trial demonstrates that Mr. Warnking in a few emails discussed only publically-known developments with renal denervation; however, these discussions do not include any evidence of conception and do not include any Proprietary Information.

In sum, the IAA required much more than a mere idea to trigger Mr. Warnking's contractual obligations to ProRhythm, and there is no evidence that the idea of using ultrasound for renal denervation was conceived of by Mr. Warnking while he was at ProRhythm. In fact, all evidence demonstrates that this idea was in the public domain and was initially presented to ProRhythm and Mr. Warnking by third parties. Accordingly, Defendants are entitled to a reversal of the Court of Chancery's Opinion and Final Judgment.

²⁴ Defs.' Corrected Opening Br. at 17-18.

II. THE INHERENT CHARACTERISTICS OF THE RELEVANT TECHNOLOGY DEMONSTRATE THAT IT DOES NOT CONTAIN PROPRIETARY INFORMATION RELATED TO THE BUSINESS OF PRORHYTHM

As a fundamental matter, the idea to use ultrasound for renal denervation is not the Invention. The Invention is a method of providing a volumetric energy field that targets nerves dosimetrically, without ablating tissue, with a known energy level.²⁵ ReCor's excerpt from the '429 application is exactly what the footnote says, an "excerpt from "Brief Summary of the Invention" in the '429 application" and not the entirety of the Invention.²⁶ The Invention's claims are set forth in the body of the '429 application and are more extensive and detailed than the quoted summary.²⁷ Thus, ReCor's characterization of the Brief Summary as "exactly what has been conceived and researched at ProRhythm and what Dr. Nakagawa had actually performed"²⁸ is based on an unnecessarily restrictive view of the Invention.

Because the Invention and the relevant technology dictates the answer to Defendants' question – "[d]id the evidence presented at trial prove that Mr. Warnking's Invention contained Proprietary Information related to the business of ProRhythm" – and not the emails relied upon by ReCor, Defendants' Opening Brief was necessarily focused on the specifics of the Invention and the relevant

²⁵ A-325 – A-377; A-537.

²⁶ ReCor's Ans. Br. at 17-18.

²⁷ A-346 – A-348.

²⁸ ReCor's Ans. Br. at 18.

technology. Explained both in writing and in illustration,²⁹ it is clear that the Invention is different than anything that was done at or contemplated by ProRhythm, and is different than what Dr. Nakagawa did during the renal denervation portion of the June 27 study.

As such, the Court of Chancery's Opinion holding that Mr. Warnking conceived of the Invention while at ProRhythm and it therefore belonged to ReCor was clearly erroneous and must be reversed.

²⁹ The diagram located at page 12 of Defendants' Opening Brief is not and was not intended to be new evidence. The diagram is merely an illustration of the oral descriptions provided at trial for the relevant technologies.

III. THE COURT OF CHANCERY'S INEQUITABLE REMEDY MUST BE REVERSED

A. Defendants fairly presented the issue of whether an award of the patent applications to ReCor would be inequitable at trial

At trial, ReCor sought an order declaring that ReCor owns all right, title and interest in the technology at issue, an injunction and attorney's fees.³⁰ Defendants argued that the technology was not an asset purchased by ReCor under the APA.³¹ Thus, the only logical conclusion that could be drawn is that Defendants, in the event the Court of Chancery (a court of equity) found for ReCor, would argue an award of the technology to ReCor was inequitable. Moreover, at trial, David Smith, President and CEO of SII, testified to the amount of time spent and the labor exerted by SII in perfecting the inventions,³² thus, ReCor was fairly apprised that if the patent applications were awarded to ReCor, Defendants would raise the issue of the inequities on appeal. Thus, ReCor's argument that such defenses and claim were not preserved is without merit.

B. The interests of justice so require the Supreme Court to consider and determine whether the Chancery Court abused its discretion in awarding the patent applications, injunction and attorney's fees to ReCor

Pursuant to Supreme Court Rule 8, when the interests of justice so require, the Supreme Court may consider and determine any question not so presented at

³⁰ B-093 – D-094.

³¹ B-088 – B-089.

³² AR-15 – AR-20.

the trial of the matter. Supr. Ct. R. 8. Here, Defendants could not have reasonably foreseen the inequitable remedy that the Court of Chancery fashioned and therefore could not have squarely addressed it during trial. The focus at trial was the Invention and the related technology. Defendants could not raise the issue of the inequities of the Court of Chancery's remedy during trial because the Court of Chancery had not yet rendered its decision.

Given the gravity of the award to ReCor, and the inequities suffered by Defendants as a result, the Supreme Court should consider and determine whether the Court of Chancery abused its discretion in fashioning its remedy.

C. The Chancery Court abused its discretion in awarding the patent applications, an injunction and attorney's fees to ReCor

ReCor is not entitled to the product of Defendants' labor and efforts, but rather only what was in Mr. Warnking's mind prior to the APA. Anything that was in Mr. Warnking's mind while he was at ProRhythm, however, was in such a state of infancy that it took an extensive series of bench studies compiling over 150 different data points, over 80 renal artery studies in animals, six iterations of catheters to use in those animal studies, and human studies with extensive follow up over the course of roughly 18 months to confirm the Invention.³³ Thus, the award of the patent applications to ReCor was entirely inequitable.

³³ AR-15 – AR-20.

Further, the ‘757 PCT application is not an admission that the entirety of what is contained therein was conceived of at the time of the filing of the ‘429 application. Specifically, 37 C.F.R. §1.78 explains how to claim priority to an earlier application. It does not state that a claim of priority is an admission as to when material was conceived. In patent law, conception is the mental part of invention and is defined as “the formation in the mind of the inventor, of a definite and permanent idea of the complete and operative invention, as it is hereafter to be applied in practice.” *Invitrogen Corp. v. Clontech Laboratories, Inc.*, 429 F.3d 1052, 1063 (Fed. Cir. 2005) (citing *Hybritech, Inc. v. Monoclonal Antibodies, Inc.*, 802 F.2d 1367, 1376 (Fed. Cir. 1986)). Thus, the date of conception for subject matter in a patent application can be considered the date when the subject matter is first disclosed to the patent office (which may be the present patent application or a prior patent application from which priority is claimed). Thus inventive subject matter in the ‘757 PCT Application³⁴ can have one of three dates of conception, the filing date of the ‘757 PCT Application (May 5, 2011), the filing date of the ‘618 application³⁵ (January 6, 2010), or the filing date of the ‘429 application³⁶ (October 30, 2009). ReCor’s argument, relying on 37 C.F.R. § 1.78 that “an admission that

³⁴ A-492.

³⁵ A-378.

³⁶ A-325.

what is claimed in those later applications was conceived at the same time as the material in the earlier application,” is misplaced.³⁷

Further, ReCor has not demonstrated that it is entitled to an injunction. The patent applications at issue have not yet been approved, thus there can be no claim for infringement. Accordingly, absent a claim for infringement there is no need for an injunction. Moreover, while the patent applications are pending, Defendants are prohibited from utilizing the technology contained therein, which effectively prohibits Defendants from working in their chosen line of work. As explained above, Defendants spent significant time and money developing and perfecting the technology contained in the patent applications and are prohibited from using that technology because of the injunction. Therefore, the Court of Chancery’s remedy awarding an injunction to ReCor was an abuse of discretion and must be reversed.

Defendants spent significant time, resources and money perfecting the Invention – ReCor did not. Regardless of whether the Court finds that Mr. Warnking breached the IAA, it is clear that the work perfecting the Invention was done by Defendants. ReCor is not entitled to a windfall of extremely valuable technology and an injunction prohibiting the Defendants from using that technology and attorney’s fees, just because it claims the idea of using ultrasound for renal denervation was conceived of at ProRhythm. Accordingly, an award of

³⁷ ReCor’s Ans. Br. at 27.

the patent applications, an injunction and attorney's fees to ReCor was inequitable, and the Court of Chancery's award should be reversed.

D. ReCor did not establish that Mr. Warnking breached his fiduciary duties to ProRhythm

As a preliminary matter, ReCor named only Mr. Warnking in this action and asserted a claim for breach of fiduciary duty against Mr. Warnking only.³⁸ Thus, ReCor's attempt to now claim that Mr. Smith and Mr. Zou breached their fiduciary duties to ProRhythm is improper. Any actions taken or statements made by Mr. Zou and Mr. Smith are irrelevant to the issue of whether Mr. Warnking breached his fiduciary duties to ProRhythm.

Further, ReCor did not meet its burden of proof that Mr. Warnking breached his fiduciary duties owed to ProRhythm because ReCor has not substantiated its claim that Mr. Warnking "took and sought to exploit the ultrasound renal denervation technology" for his own account.³⁹

ReCor did not elicit testimony from any member of ProRhythm's Board of Directors to show that renal denervation was an opportunity that ProRhythm would have considered moving forward with. The use of ultrasound for renal denervation was not a secret idea; rather it was a widely discussed topic in the medical device industry and those on ProRhythm's Board certainly had access to such

³⁸ B092 (Pre-Trial Stipulation and Order at 2 & 4).

³⁹ ReCor's Ans. Br. at 32.

information. In fact, all of the testimony shows that ProRhythm was in bankruptcy and had no money and would not have moved into a completely new space. Thus, absent testimony from the Board of Directors of ProRhythm that ProRhythm would have been interested in renal denervation, the claim for breach of fiduciary duty against Mr. Warnking must fail.

Additionally, Mr. Warnking did not usurp any opportunities with respect to renal denervation from ProRhythm. Neither ProRhythm nor ReCor had any interest whatsoever in pursuing renal denervation at the time of the APA. In fact, ReCor had absolutely no conflict with Mr. Warnking and SII engaging in renal denervation work in October 2010, more than one year after the APA.⁴⁰ Nevertheless, ReCor conveniently had a conflict once it decided to abandon the mitral valve assets it purchased from ProRhythm and move into the renal denervation space.

Accordingly, ReCor did not meet its burden of proof in proving that Mr. Warnking breached his fiduciary duties to ProRhythm, by way of usurping corporate opportunities or otherwise, and therefore ReCor's application that the Court affirm the Court of Chancery's Opinion on its breach of fiduciary duty claim must be rejected.

⁴⁰ A322 – 324.

CONCLUSION

Based on the foregoing, Defendants respectfully request that this Court (1) reverse the Court of Chancery's Opinion in its entirety; and (2) deny ReCor's application for its reasonable attorney's fees in connection with this appeal.

November 27, 2013

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