UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

BUTAMAX(TM) ADVANCED BIOFUELS LLC	:	CA. NO. 11-54-SLR
	:	September 7, 2011
	:	
Plaintiff,	:	4:03 O'clock p.m.
	:	
v.	:	
	:	
GEVO INC.	:	
	:	
Defendant,	:	

.....

TRANSCRIPT OF TELECONFERENCE

BEFORE THE HONORABLE MARY PAT THYNGE

UNITED STATES MAGISTRATE JUDGE

APPEARANCES:

For the Plaintiff: POTTER, ANDERSON & CORROON

BY: DAVID E. MOORE, ESQ

-and-

KAYE SCHOLER

BY: LEORA BEN-AMI, ESQ

BY: HANK HECKEL, ESQ

BY: CHRISTOPHER T. JAGOE, ESQ

For the Defendant: MORRIS, NICHOLS, ARSHT & TUNNELL

BY: THOMAS C. GRIMM, ESQ

-and-

COOLEY LLP

BY: CAROLYN V. JUAREZ, ESQ

Court Reporter: LEONARD A. DIBBS

Official Court Reporter

P R O C E E D I N G S

THE COURT: Good afternoon, counsel, this is Judge Thygne.

MR. MOORE: Good afternoon, David Moore for Butamax at Potter, Anderson & Corroon.

With me on the line is Leora Ben-Ami, Hank Heckel and Chris Jagoe.

THE COURT: All right. Thank you. Good afternoon to all of you.

MS. BEN-AMI: Good afternoon, your Honor.

THE COURT: Who is on the line on behalf of Gevo?

MR. GRIMM: Tom Grimm at Morris, Nichols here in Wilmington.

On the line with me is Carolyn Juarez of the Cooley firm.

THE COURT: Okay.

My understanding is there's an issue that has arisen between the two parties. There are two issues from what I understand.

So, it's a production of physical samples -- maybe it's three issues. To supplement to Gevo's response to Interrogatories numbers 1 through 4 and the supplement to Gevo's response to Interrogatory No. 7.

This is Butamax's motion, in effect. So, who is going

to be arguing on behalf of behalf of Butamax?

MS. BEN-AMI: Leora Ben-Ami to start with and perhaps someone else might jump in and they will let us know, I hope.

Would you like me to proceed, your Honor?

THE COURT: Why don't you proceed.

One of the issues that you brought up was about what Gevo has asserted that it's recombinant microbial host cells are different enzymes than those claimed in the '188 patent. And you also argue that you should be allowed to analyze these cells directly rather than relying on Gevo's own internal documents which characterizes the cells.

You point out to me that enzymes have structural and functional elements and analysis of how they behave under various conditions is valuable probative evidence on the issue of infringement if the tests are done correctly.

I'm not necessarily disagreeing with you on this point. One of the issues you brought up was -- testing can take time.

So, how long does the testing usually take to find out what the composition of these, I guess, enzymes are to make sure -- what the composition -- the composition of the recombinant host cells are and to figure out the different enzymes that are in them to determine whether or not their -- Gevo's recombinant host cells potentially infringe?

MS. BEN-AMI: Well, your Honor, I need to give you a little context so that I can answer the question.

There's a little multifaceted question in reality.

The issue here is that there's a pathway, and the pathway says, you know, using a enzyme you go from A to B and using a different enzyme, you go from B to C and so forth.

And it's not just an issue of timing here, it's an issue about whether we need to take Gevo's scientific word for what these enzymes do -- what they can do -- what they do do or what they can do.

THE COURT: Leora, I understand the timing question that I had went to the issue of how long it would take you to test this to find out the information that you are potentially looking for. That was my question.

MS. BEN-AMI: It could take three months. It could take six months depending on what we see in the first set of tests. You don't do these tests -- you would first go ahead and do certain tests to find out what the chemical structure of the enzymes were.

THE COURT: So, you find out the chemical structure first?

MS. BEN-AMI: That would be one thing you would do.

You could go ahead and see how it acts in an environment. Then you might say, well, I'm done, or you might say now I need to see how it works in a different environment, or you might see -- you just can't say this is very simple. It's definitely three months.

THE COURT: Let me ask you this. Again, realistically, what type of testing -- there are test protocols, I would imagine. You have to come up with, I guess, a lab that is going to be doing this. It would have to be a lab or somebody that would not -- Gevo would not find offensive necessarily and that could keep confidential aspects of this, because my understanding is that essentially these micro-organisms are the crown jewels of Gevo's business.

And I recognize your argument saying we shouldn't have to rely upon the tests that Gevo did. We want to have more involved testing or additional testing to basically prove our case.

So, had the test protocol been worked out and has there been there any discussions in that regard, have you made a proposal of a test protocol, and have you made a proposal of the lab that would run this testing and when it would occur?

MS. BEN-AMI: We gave Gevo the names of two labs that would operate as independent experts and operate under the Protective Order.

THE COURT: Okay.

MS. BEN-AMI: They did not object to them.

MR. GRIMM: Your Honor, I don't think that's a fair characterization. Number one, they asked for this conference before they gave us the names of those two labs.

In fact, we have asked them for a proposal that would

include what types of tests, where they are going to be done, who is going to do them, how are you going to transport them. And they haven't given us any of that information.

MS. JUAREZ: And, your Honor, just to clarify the labs that Butamax has proposed are just those that Butamax says that it maybe used to conduct the testing.

MS. BEn-AMI: Your Honor, we did give them the names of two labs. And we did indicate that they would sign the undertaking under the Protective Order.

As to the given protocols of exactly what the testing is. That is not something that we normally do because that is work product.

THE COURT: I think in the end if you're going to make the argument that it infringes, you're going to have to provide that because you just said to me, relying upon the way Gevo did its testing and what it was doing, we shouldn't be limited to Gevo's results conducted under its own testing parameters.

So, if you are going to use testing parameters and approach that Gevo is going to tell you what type of testing parameters it has done and it has used in its written production, or its document production, and you're going to use a different protocol or parameters by independent testing to possibly yield results or data leading to interpretation or conclusions that could be different than Gevo's, then I do think your testing parameters are directly on the table because they

are going to become directly an issue about whether or not these micro-organisms infringe.

MS. BEN-AMI: Your Honor, if the tests were used to prove infringement, of course you would be correct, literally speaking that is done after the tests are run and after they are used in expert discovery.

However, to do the underlying test is something that you do during fact discovery because the bugs, if you will, are documents. They are the federal rules. But I don't think we need to get into the so much what is the protocol point now, because if you order us to do that, then that's what's going to happen. I don't think that's right. I think that's work product at this stage.

But what is clear is this case started in January. We're in September. They keep telling investors that they have a different pathway. They won't tell us a thing about what the difference is and why they don't infringe.

And it's nice to say we're going to produce 300,000 pages of documents and it's nice to say and sometime thereafter we're going to tell you. And then it will be the end of paper discovery -- document discovery time, and we won't to be able to follow-up. And that's not -- we've served these interrogatories. We served the requests for the samples. The samples in bio-tech cases are analyzed all the time. And under the Protective Order, you know, to the extent it's outside

counsel, an expert. The outside counsel in our case are not counsel who prosecute at all. So there's no issue there. And it's a question of can we move this case forward?

MS. JUAREZ: Your honor, just to clarify. They are not the commitments that Gevo has made.

Gevo has not left deadlines in the air for supplementation of its interrogatory responses.

Gevo has provided specific deadlines by which it plans to supplement its interrogatory responses to include records of specific Bates numbers and also provided additional information about its Non-infringement Contentions.

THE COURT: When are you going to provide -- are those interrogatories numbers 1 through 4 and 7?

MS. JUAREZ: Interrogatories 1 through 4 requests technical information and Interrogatory No. 7 requests Gevo's non-infringement position.

Interrogatories 1 through 4, I noticed just today, your Honor, that Butamax did not submit Gevo's initial responses which do refer to Federal Rule 33(d) and does include a reference that Gevo will supplement its interrogatory responses to provide specific Bates numbers.

And Gevo will do that as soon as possible. This is a very large production. We have to map Bates numbers to specific interrogatory responses.

THE COURT: When were you planning to do that?

MS. JUAREZ: We're doing that as soon as possible, but no later than 30 days after production.

MR. GRIMM: It's important to emphasize, your Honor, that we're being accused of not telling them what our non-infringement position is, when they only told us their infringement position last week.

So, we said we would supplement in response to their supplement within a matter of a few weeks.

MS. JUAREZ: By September 21st, your Honor.

THE COURT: So you're going -- wait a minute.

I want to understand what's going to happen on 9-21, what you're proposing.

What are you proposing that Gevo does on 9-21?

MS. JUAREZ: Gevo has agreed to supplement its response to Interrogatory No. 7 by September 21st. That's the interrogatory that requests the Non-infringement Contentions.

THE COURT: Okay.

What about all these documents you were going to be producing, 300,000 pages?

MS. JUAREZ: Gevo is diligently working to map Bates numbers now that they have been generated to specific interrogatories.

MR. GRIMM: Again, your Honor, I think it's important to point out that document production under the Scheduling Order, as you know, Judge Robinson likes to get document

production out of the way first. It's not due until November 1. So, it's a little bit of no good deed goes unpunished. And we say we'll do our document production in mid-September and we're being accused of dragging our feet.

And, by the way, the plaintiff hasn't made a substantial document production to date.

MS. BEN-AMI: Your honor --

THE COURT: No. Before you go on, when are you planning to get your mapping completed of Bates numbers to specific IG's, interrogatory responses?

MS. JUAREZ: We are working to do that.

These Bates numbers have just been generated and so we'll be working to do that. We'll do it as soon as possible.

As you know, a production of this size, it could take a little while.

We've committed to do it as soon as possible, but no later than 30 days after production.

THE COURT: Hold on. 30 days after production of?

MS. JUAREZ: Of the approximately 300,000 page production.

THE COURT: That 30 days is hinged on when you do the 300,000 page production.

When are you going to do the 300,000 page production?

MS. JUAREZ: It will be produced today.

THE COURT: The 300,000 pages are going to be produce

today which is 9-7.

I'm thinking that you could probably get your Bates number responses to the specific interrogatories done by -- probably by October 1st.

Just tell me, is October 1st a weekend?

MS. JUAREZ: October 1st is a Saturday, your Honor.

THE COURT: It's October 3rd.

Now, let's talk about your basis for why you shouldn't be required to produce your micro-organisms.

MS. JUAREZ: Your Honor, Gevo has never said that it would not produce micro-organisms.

Gevo's position has always been that immediate production is premature for two reasons. Number one, that it may not be necessary to produce cell samples because -- Butamax should be able to derive the information it needs from Gevo's technical documents, including its scientific reports that memorialize the experiments that Gevo has conducted.

THE COURT: What if they disagree with the type of experiments that you've done and they are sitting there saying there are other approaches that we want to take to check and confirm the accuracy of what you've done scientifically?

MS. JUAREZ: Your honor, Gevo has always been willing to consider that.

All we've done because this information is so proprietary and because it is the crown jewel -- these are the

crown jewels of Gevo's business and because Butamax is a competitor, we have always requested that Butamax review the documents that we're producing, and if it needs additional information, to let us know about the experiments that it plans to conduct with the cell sample.

Again, we also believe that Butamax should propose storage and handling procedures. It should provide a list of those experiments so that we can gather rebuttal information.

THE COURT: That's assuming they are going to end up using it, right?

MS. JUAREZ: That's correct, your Honor.

As Ms. Ben-Ami has explained, these experiments do take sometime and we shouldn't have to wait until the close of fact discovery for Butamax to disclose that it ran experiments x, y and z and plans to use them in the results in their expert reports that are due two months later.

THE COURT: Let me go back a little bit.

On the issue concerning the micro-organisms, have you provided a laundry list of information that you are asking for from Butamax regarding the transfer of management of these micro-organisms that they are going to use -- that they are going to be testing?

MS. JUAREZ: We've requested the information about the laboratories that plan to conduct the experiments, the procedures for storage and handling. Butamax has also requested

that information from us. But we believe that because Butamax is going to the -- employing these labs to conduct these experts, that it should at least disclose what procedures those labs have for storage and handling.

It's difficult for us to look into how Butamax plans to use these cells in scientific experiments without knowing what conversations they've had with the labs about procedures.

THE COURT: So, it's the storage and handling procedures that you are concerned about as well as the lab -- what lab is going to be chosen and the fact that that lab needs to be under the Protective Order, right?

MS. JUAREZ: You're right, your Honor.

And also because we also requested information about experts that Butamax plans to conduct experiments, because we assume, of course, your Honor, that outside counsel is not going to be conducting these experiments themselves.

And Butamax just proposed last week, I believe the day before these briefs were due as to potential experts. Gevo is considering those experts. The objection period, I believe, is up tomorrow.

THE COURT: You want to know who is actually going to run the experiments?

MS. JUAREZ: Yes, your Honor.

THE COURT: And find out whether you have any objections to that individual for conflict problems, whatever,

even with the operation of the Protective Order?

MS. JUAREZ: That's right, your Honor.

And to my knowledge, Butamax has just disclosed potential experts, but have not specifically said whether these experts would be running the experiments on these cell samples.

At this point, your Honor, Gevo isn't -- as we put in our brief, these are Gevo's crown jewels.

It's almost as if Butamax is asking us to send them out willy-nilly, without any procedures for handling, without knowing how they are going to be used.

They can take proprietary modifications that are not at issue in this case.

MR. JAGOE: I've been involved in these meet-and-confers, negotiations.

I think it is not -- the record is not completely accurately portrayed because Butamax when it served its request for production of samples, we immediately contacted counsel for Gevo and said, we'd like to work out with you the protocols for the logistics of a transfer, and if you have any specific requirements on how the materials would be handled, let's get that all worked out now.

For Gevo to say that we have to propose how their samples should be handled safely, I think gets it backwards.

We engaged them. We said, how do you want us to treat them? Do you want us to keep them in cold storage? Do you want

us to keep them under any special conditions? Tell us what you want us to do.

We hired a reputable lab. We identified it to Gevo by name. And we believe that that lab knows how to handle biological materials. And if they have anything in particular about their samples, they should tell us and we'll see if we can abide by that. If we can't abide by that, we'll go from there.

But as far as the expert, we also identified the person at the lab who signed the undertaking on the Protective Order. And that was given to Gevo. So they know the name of the person at the lab who's going to run the samples.

We also identified a university expert as a consultant who also signed the Protective Order.

So, I think that -- it appears to me that this is really a stall tactic, and that every time we try to come to some resolution about meeting their demand, they say, well, that's still not good enough, that's still not good enough, that's still not good enough.

And I think if there is a legitimate concern about storage and handling of these types of materials which they apparently have the expertise in, they should let us know what they are and we'll see if our lab can accommodate those. If they can, then there's no issue. If they can't, then we'll have to deal with that.

But for us to propose something and then for them just

to say, well, that is still not good enough, it adds further delay, I believe.

MS. JUAREZ: Your honor, just to respond to counsel's allegation that this is a stall tactic. I want to clarify the timeline.

Butamax served its request for production at the end of June. Gevo served its responses timely and stated in its responses that it was willing to meet-and-confer regarding the procedures for handling cell samples.

We've repeatedly in meet-and-confers told counsel for Butamax that we don't believe that production of cell samples is necessary.

We requested that Butamax review the technical scientific reports that we plan to produce today and then explain to us what experiments it believes that it still needs to run.

As far as being told time and again what the procedures would be, or being told anything concrete about what Butamax plans to do with these samples, Butamax just disclosed the names of two labs within, I believe, the last ten days. It just disclosed experts last week.

Gevo has not been stalling.

THE COURT: Well, it seems to me that you've gone quite a distance.

I want it confirmed as to the expert who is going to be

running the tests, who is going to be involved in consulting on this.

I want it confirmed and identified. I want the lab specifically identified. I want to make sure that all of these people, entities are under the Protective Order.

I want counsel to meet-and-confer to discuss. And they have to meet-and-confer to discuss how these materials are going to be handled.

Any concerns that Gevo has about the materials, they are to convey those concerns to plaintiff's counsel about it. You're suppose to work together and get this set up as though -- I'm not saying I'm ordering it now -- as though these micro-organisms will be transferred and will be made available to Butamax.

The issue that's out there remaining is whether or not the protocols or procedures or processes, that these micro-organisms will be going through will be something else that Butamax has to provide prior to the actual experimentation or analysis.

And I am going to allow you to provide me -- each of you to provide me with a three page letter explaining to me whether I can, whether it should be done or should not be done prior to the time Gevo's micro-organisms could be made available to Butamax for experimentation or testing or review.

You will meet-and-confer and get that done so that we

can have a telephone conference on Monday the 19th at -- am I dealing with people from California or from the west coast.

MR. GRIMM: Colorado, your Honor.

THE COURT: Okay. Colorado. What is that, two hours?

MS. JUAREZ: Two hours, your Honor.

THE COURT: So we'll talk about this at 1:00 o'clock on Monday the 19th.

You will do your submissions to me on the issue -- the very limited issue that I brought up with the submission by Butamax due by 1:00 o'clock in the afternoon on Thursday the 15th and the response by Gevo on Friday the 16th by 1:00 o'clock.

If anything is under seal, you must make certain that the document or the submission gets to me and to my chambers or downstairs in the clerk's office by no later than one hour after the due date and time.

And we'll talk about it on the 19th and figure out whether or not you're going to have production of these. But I want everything in place before I even finalize the issue.

Get your meet-and-confer done. Get your discussions done. Get it into me because the argument that is being made that you shouldn't have to advise Gevo of the protocol. And if you don't have to advise -- if you are taking the position Butamax you don't have to advise Gevo of the protocol, the processes or the testing or the analysis that is going to be

done, then I want to know when you would be obligated to inform them of this in relationship to the Scheduling Order regarding certain dates that matters should be completed to allow them sufficient enough time to be able to run the same experiments.

MR. GRIMM: Very well.

THE COURT: Thank you.

I haven't decided whether this stuff is going to be exchanged or not, but I want to have like I said all the ducks in a row before we move forward. And we've got it on the 19th at one p.m. Eastern time.

And, Tom, could you do me one favor?

Could you send out an e-mail to everybody just confirming that? I may not issue a separate order.

MS. BEN-AMI: I understood everything you said. I don't think we really addressed Interrogatory No. 7 though.

THE COURT: I thought she said she was going to answer it by the 21st, right?

MS. JUAREZ: Yes, your Honor.

THE COURT: That's fine with me.

She's going to answer it by the 21st and supplement it by the 21st. That's going to happen.

I said the Bates numbers for the IG's will have to be done by October 3rd.

She's also indicated to me that the 300,000 pages that were planning to be produced were happening today. I don't have

a problem with any of those dates in light of where we are in the schedule.

You're going to get the documents today. You may have actually had a chance to go through some of them to figure out exactly what you want to do as far as analysis is concerned and whether the technical information they provided to you is particularly helpful and maybe part of the ammunition you choose to use in your further argument to me.

THE COURT: Tom?

MR. GRIMM: Yes, your Honor.

THE COURT: I asked if you could just make sure you send an e-mail around to everybody confirming our meeting for the 19th at 1:00 o'clock?

MR. GRIMM: Absolutely.

THE COURT: I may not get an order issued. Include a copy to myself and Cathy, too.

MR. GRIMM: Will do.

THE COURT: Thank you.

(At this time, the teleconference concluded)

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'188 [1] - 4:8

1

1 [5] - 3:23, 9:13, 9:14, 9:17, 11:1
11-54-SLR [1] - 1:4
16th [1] - 19:11
19th [5] - 19:1, 19:7, 19:17, 20:9, 21:13
1:00 [1] - 21:13
1st [3] - 12:4, 12:5, 12:6

2

2011 [1] - 1:5
21st [5] - 10:9, 10:15, 20:17, 20:20, 20:21

3

30 [4] - 10:2, 11:17, 11:18, 11:21
300,000 [7] - 8:18, 10:19, 11:19, 11:22, 11:23, 11:25, 20:24
33(d [1] - 9:19
3rd [2] - 12:7, 20:23

4

4 [4] - 3:23, 9:13, 9:14, 9:17
4:03 [1] - 1:7

7

7 [6] - 1:5, 3:24, 9:13, 9:15, 10:15, 20:15

9

9-21 [2] - 10:11, 10:13
9-7 [1] - 12:1

A

abide [2] - 16:7
able [3] - 8:21, 12:15, 20:4
Absolutely [1] - 21:14
accommodate [1] - 16:22
accuracy [1] - 12:21
accurately [1] - 15:16
accused [2] - 10:4, 11:4
acts [1] - 5:21
actual [1] - 18:18
additional [3] - 6:11, 9:10, 13:3
addressed [1] - 20:15
adds [1] - 17:1
advise [3] - 19:22, 19:23, 19:24
afternoon [5] - 3:3, 3:5, 3:9, 3:11, 19:10
agreed [1] - 10:14
ahead [2] - 5:15, 5:21
air [1] - 9:6
allegation [1] - 17:4
allow [2] - 18:20, 20:3
allowed [1] - 4:9
almost [1] - 15:8
AMI [12] - 2:3, 3:11, 4:2, 4:24, 5:13, 5:20, 6:17, 6:21, 7:7, 8:3, 11:7, 20:14
Ami [3] - 3:7, 4:2, 13:12
ammunition [1] - 21:7
analysis [4] - 4:13, 18:19, 19:25, 21:5
analyze [1] - 4:9
analyzed [1] - 8:24
ANDERSON [1] - 1:24
Anderson [1] - 3:6
answer [3] - 4:25, 20:16, 20:20
APPEARANCES [1] - 1:22
approach [1] - 7:19
approaches [1] - 12:20
argue [1] - 4:9
arguing [1] - 4:1
argument [4] - 6:9, 7:14, 19:21, 21:8
arisen [1] - 3:18
ARSHT [1] - 2:8
aspects [1] - 6:6
asserted [1] - 4:7
assume [1] - 14:15
assuming [1] - 13:9
available [2] - 18:13, 18:23

B

backwards [1] - 15:23
basis [1] - 12:8
Bates [8] - 9:10, 9:21, 9:23, 10:20, 11:9, 11:12, 12:2, 20:22
become [1] - 8:1
BEFORE [1] - 1:18
behalf [3] - 3:12, 4:1
behave [1] - 4:13
believes [1] - 17:15
BEN [11] - 2:3, 3:11, 4:2, 4:24, 5:13, 5:20, 6:17, 6:21, 8:3, 11:7, 20:14
Ben [4] - 3:7, 4:2, 7:7, 13:12
BEN-AMI [11] - 2:3, 3:11, 4:2, 4:24, 5:13, 5:20, 6:17, 6:21, 8:3, 11:7, 20:14
Ben-Ami [4] - 3:7, 4:2, 7:7, 13:12
between [1] - 3:19
bio [1] - 8:24
bio-tech [1] - 8:24
BIOFUELS [1] - 1:4
biological [1] - 16:5
bit [2] - 11:2, 13:17
brief [1] - 15:7
briefs [1] - 14:18
brought [3] - 4:6, 4:17, 19:9
bugs [1] - 8:8
business [2] - 6:8, 13:1
Butamax [29] - 3:5, 4:1, 7:5, 9:18, 12:14, 13:1, 13:2, 13:6, 13:14, 13:20, 13:25, 14:1, 14:5, 14:14, 14:17, 15:3, 15:8, 15:16, 17:6, 17:11, 17:13, 17:18, 17:19, 18:14, 18:18, 18:24, 19:10, 19:24
Butamax's [1] - 3:25
BUTAMAX(TM) ADVANCED [1] - 1:4
BY [6] - 1:25, 2:3, 2:4, 2:5, 2:9, 2:12

C

CA [1] - 1:4
California [1] - 19:2
Carolyn [1] - 3:15
CAROLYN [1] - 2:12
case [5] - 6:12, 8:14, 9:1, 9:3, 15:12
cases [1] - 8:24
Cathy [1] - 21:16
cell [5] - 12:14, 13:5, 15:5, 17:9, 17:11
cells [6] - 4:7, 4:9, 4:11, 4:21, 4:23, 14:6
certain [3] - 5:16, 19:13, 20:3
chambers [1] - 19:14
chance [1] - 21:4
characterization [1] - 6:23
characterizes [1] - 4:11
check [1] - 12:20
chemical [2] - 5:16, 5:18
choose [1] - 21:7
chosen [1] - 14:10
Chris [1] - 3:8
CHRISTOPHER [1] - 2:5
claimed [1] - 4:8
clarify [3] - 7:4, 9:4, 17:4
clear [1] - 8:14
clerk's [1] - 19:15
close [1] - 13:13
coast [1] - 19:2
cold [1] - 15:25
Colorado [2] - 19:3, 19:4
commitments [1] - 9:5
committed [1] - 11:16
competitor [1] - 13:2
completed [2] - 11:9, 20:3
completely [1] - 15:15
composition [3] - 4:19, 4:20
concern [1] - 16:19
concerned [2] - 14:9, 21:5
concerning [1] - 13:18
concerns [2] - 18:9, 18:10
concluded [1] - 21:19
conclusions [1] - 7:24
concrete [1] - 17:18
conditions [2] - 4:14, 16:1
conduct [5] - 7:6, 13:5, 13:24, 14:2, 14:14
conducted [2] - 7:17, 12:17
conducting [1] - 14:16
confer [5] - 17:8, 18:6, 18:7, 18:25, 19:20
conference [2] - 6:23, 19:1
confers [2] - 15:14, 17:10
confidential [1] - 6:6
confirm [1] - 12:21
confirmed [2] - 17:25, 18:3
confirming [2] - 20:13, 21:12
conflict [1] - 14:25
consider [1] - 12:23
considering [1] - 14:19
consultant [1] - 16:12
consulting [1] - 18:1
contacted [1] - 15:17
Contentions [2] - 9:11, 10:16
context [1] - 4:25
conversations [1] - 14:7
convey [1] - 18:10
Cooley [1] - 3:15
COOLEY [1] - 2:11
copy [1] - 21:16
correct [2] - 8:4, 13:11
correctly [1] - 4:15
Corroon [1] - 3:6
CORROON [1] - 1:24
counsel [9] - 3:3, 9:1, 9:2, 14:15, 15:17, 17:10, 18:6, 18:10
counsel's [1] - 17:3
course [2] - 8:4, 14:15
COURT [36] - 1:1, 3:3, 3:9, 3:12, 3:17, 4:5, 5:9, 5:18, 6:1, 6:20, 7:13, 9:12, 9:25, 10:10, 10:17, 11:8, 11:18, 11:21, 11:25, 12:7, 12:18, 13:9, 13:17, 14:8, 14:21, 14:24, 17:23, 19:4, 19:6, 20:6, 20:16, 20:19, 21:9, 21:11, 21:15, 21:18
Court [2] - 2:16, 2:17
crown [4] - 6:8, 12:25, 13:1, 15:7

D

data [1] - 7:23
date [2] - 11:6, 19:16
dates [2] - 20:3, 21:1
DAVID [1] - 1:25
David [1] - 3:5
days [5] - 10:2, 11:17, 11:18, 11:21, 17:20
deadlines [2] - 9:6, 9:8
deal [1] - 16:24
dealing [1] - 19:2
decided [1] - 20:7
deed [1] - 11:2

Defendant [2] - 1:13, 2:8
definitely [1] - 5:25
DELAWARE [1] - 1:2
delay [1] - 17:2
demand [1] - 16:16
derive [1] - 12:15
determine [1] - 4:22
DIBBS [1] - 2:16
difference [1] - 8:17
different [7] - 4:8, 4:21, 5:4, 5:23, 7:22, 7:24, 8:16
difficult [1] - 14:5
diligently [1] - 10:20
directly [3] - 4:10, 7:25, 8:1
disagree [1] - 12:18
disagreeing [1] - 4:16
disclose [2] - 13:14, 14:3
disclosed [3] - 15:3, 17:19, 17:21
discovery [5] - 8:6, 8:8, 8:21, 13:14
discuss [2] - 18:6, 18:7
discussions [2] - 6:14, 19:20
distance [1] - 17:24
DISTRICT [2] - 1:1, 1:2
document [7] - 7:21, 8:21, 10:24, 10:25, 11:3, 11:6, 19:14
documents [7] - 4:10, 8:9, 8:19, 10:18, 12:16, 13:3, 21:3
done [16] - 4:15, 5:22, 7:1, 7:20, 8:5, 12:3, 12:19, 12:21, 12:24, 18:22, 18:25, 19:20, 19:21, 20:1, 20:23
downstairs [1] - 19:15
dragging [1] - 11:4
ducks [1] - 20:8
due [5] - 11:1, 13:16, 14:18, 19:10, 19:16
during [1] - 8:8

E

e-mail [2] - 20:12, 21:12
Eastern [1] - 20:10
effect [1] - 3:25
elements [1] - 4:13
emphasize [1] - 10:3
employing [1] - 14:2
end [4] - 7:13, 8:20, 13:9, 17:6
engaged [1] - 15:24
entities [1] - 18:5
environment [2] - 5:22, 5:23
enzyme [2] - 5:3, 5:4
enzymes [6] - 4:8, 4:12, 4:19, 4:21, 5:7, 5:17
ESQ [6] - 1:25, 2:3, 2:4, 2:5, 2:9, 2:12
essentially [1] - 6:7
evidence [1] - 4:14
exactly [2] - 7:10, 21:5
exchanged [1] - 20:8
experimentation [2] - 18:18, 18:24
experiments [14] - 12:17, 12:19, 13:4, 13:8, 13:12, 13:14, 13:24, 14:6, 14:14, 14:16, 14:22, 15:5, 17:15, 20:4
expert [6] - 8:6, 9:1, 13:15, 16:8, 16:12, 17:25
expertise [1] - 16:21
experts [8] - 6:18, 14:3, 14:14, 14:18, 14:19, 15:4, 15:5, 17:21
explain [1] - 17:15
explained [1] - 13:12
explaining [1] - 18:21
extent [1] - 8:25

F

fact [4] - 6:25, 8:8, 13:13, 14:10
fair [1] - 6:22
far [3] - 16:8, 17:17, 21:5
favor [1] - 20:11
Federal [1] - 9:19
federal [1] - 8:9
feet [1] - 11:4
few [1] - 10:8
figure [3] - 4:21, 19:17, 21:4
finalize [1] - 19:19
fine [1] - 20:19
firm [1] - 3:16
first [4] - 5:14, 5:15, 5:19, 11:1
follow [1] - 8:22
follow-up [1] - 8:22
FOR [1] - 1:2
forth [1] - 5:4
forward [2] - 9:3, 20:9
Friday [1] - 19:11
functional [1] - 4:13

G

gather [1] - 13:8
generated [2] - 10:21, 11:12
Gevo [30] - 3:12, 4:7, 6:5, 6:10, 6:17, 7:15, 7:19, 9:5, 9:6, 9:8, 9:20, 9:22, 10:13, 10:14, 10:20, 12:10, 12:17, 12:22, 14:18, 15:6, 15:18, 15:22, 16:3, 16:10, 17:7, 17:22, 18:9, 19:11, 19:22, 19:24
GEVO [1] - 1:11
Gevo's [15] - 3:22, 3:23, 4:10, 4:22, 5:6, 6:8, 7:17, 7:24, 9:15, 9:18, 12:12, 12:15, 13:1, 15:7, 18:23
given [3] - 7:3, 7:10, 16:10
GRIMM [10] - 2:9, 3:13, 6:22, 10:3, 10:23, 19:3, 20:5, 21:10, 21:14, 21:17
Grimm [1] - 3:13
guess [2] - 4:19, 6:3

H

handle [1] - 16:4
handled [3] - 15:20, 15:23, 18:8
handling [7] - 13:7, 13:25, 14:4, 14:8, 15:9, 16:20, 17:9
Hank [1] - 3:7
HANK [1] - 2:4
Heckel [1] - 3:7
HECKEL [1] - 2:4
helpful [1] - 21:7
hinged [1] - 11:21
hired [1] - 16:3
Hold [1] - 11:18
Honor [23] - 3:11, 4:4, 4:24, 6:22, 7:4, 7:7, 8:3, 9:18, 10:3, 10:9, 10:23, 12:6, 12:10, 13:11, 14:12, 14:15, 14:23, 15:2, 15:6, 19:3, 19:5, 20:18, 21:10
honor [4] - 9:4, 11:7, 12:22, 17:3
HONORABLE [1] - 1:18
hope [1] - 4:3
host [3] - 4:7, 4:21, 4:23
hour [1] - 19:15
hours [2] - 19:4, 19:5

I

identified [5] - 16:3, 16:8, 16:12, 18:3, 18:4
IG's [2] - 11:10, 20:22
imagine [1] - 6:3
immediate [1] - 12:12
immediately [1] - 15:17
important [2] - 10:3, 10:23
INC [1] - 1:11
include [3] - 7:1, 9:9, 9:19
Include [1] - 21:15
including [1] - 12:16
independent [2] - 6:18, 7:22
indicate [1] - 7:8
indicated [1] - 20:24
individual [1] - 14:25
inform [1] - 20:1
information [13] - 5:11, 7:3, 9:10, 9:15, 12:15, 12:24, 13:4, 13:8, 13:19, 13:23, 14:1, 14:13, 21:6
infringe [3] - 4:23, 8:2, 8:17
infringement [7] - 4:15, 8:4, 9:11, 9:16, 10:5, 10:6, 10:16
infringes [1] - 7:14
initial [1] - 9:18
internal [1] - 4:10
interpretation [1] - 7:23
Interrogatories [3] - 3:23, 9:14, 9:17
interrogatories [4] - 8:23, 9:13, 10:22, 12:3
interrogatory [6] - 9:7, 9:9, 9:20, 9:24, 10:16, 11:10
Interrogatory [4] - 3:24, 9:15, 10:15, 20:15
investors [1] - 8:15
involved [3] - 6:11, 15:13, 18:1
issue [16] - 3:18, 4:14, 5:2, 5:5, 5:6, 5:10, 8:1, 9:2, 13:18, 15:12, 16:23, 18:15, 19:8, 19:9, 19:19, 20:13
issued [1] - 21:15
issues [4] - 3:19, 3:22, 4:6, 4:17

J

JAGOE [2] - 2:5, 15:13
Jagoe [1] - 3:8
January [1] - 8:14
jewel [1] - 12:25
jewels [3] - 6:8, 13:1, 15:7
JUAREZ [22] - 2:12, 7:4, 9:4, 9:14, 10:1, 10:9, 10:14, 10:20, 11:11, 11:19, 11:24, 12:6, 12:10, 12:22, 13:11, 13:23, 14:12, 14:23, 15:2, 17:3, 19:5, 20:18
Juarez [1] - 3:15
JUDGE [1] - 1:19
Judge [2] - 3:3, 10:25
jump [1] - 4:3
June [1] - 17:7

K

KAYE [1] - 2:2
keep [4] - 6:6, 8:15, 15:25, 16:1
knowing [2] - 14:6, 15:10
knowledge [1] - 15:3
knows [1] - 16:4

L

l5th [1] - 19:11
l:00 [3] - 19:6, 19:10, 19:11
lab [12] - 6:3, 6:4, 6:16, 14:9, 14:10, 16:3, 16:4, 16:9, 16:11, 16:22, 18:3
laboratories [1] - 13:24
labs [8] - 6:17, 6:24, 7:4, 7:8, 14:2, 14:4, 14:7, 17:20
large [1] - 9:23
last [4] - 10:6, 14:17, 17:20, 17:21
laundry [1] - 13:19
leading [1] - 7:23

least [1] - 14:3
left [1] - 9:6
legitimate [1] - 16:19
LEONARD [1] - 2:16
Leora [3] - 3:7, 4:2, 5:9
LEORA [1] - 2:3
letter [1] - 18:21
light [1] - 21:1
limited [2] - 7:16, 19:9
line [3] - 3:7, 3:12, 3:15
list [2] - 13:7, 13:19
literally [1] - 8:4
LLC [1] - 1:5
LLP [1] - 2:11
logistics [1] - 15:19
look [1] - 14:5
looking [1] - 5:12

M

MAGISTRATE [1] - 1:19
mail [2] - 20:12, 21:12
management [1] - 13:20
map [2] - 9:23, 10:20
mapping [1] - 11:9
MARY [1] - 1:18
materials [5] - 15:20, 16:5, 16:20, 18:7, 18:9
matter [1] - 10:8
matters [1] - 20:3
meet [7] - 15:14, 17:8, 17:10, 18:6, 18:7, 18:25, 19:20
meet-and-confer [5] - 17:8, 18:6, 18:7, 18:25, 19:20
meet-and-confers [2] - 15:14, 17:10
meeting [2] - 16:16, 21:12
memorialize [1] - 12:17
micro [9] - 6:7, 8:2, 12:9, 12:11, 13:18, 13:21, 18:13, 18:17, 18:23
micro-organisms [9] - 6:7, 8:2, 12:9, 12:11, 13:18, 13:21, 18:13, 18:17, 18:23
microbial [1] - 4:7
mid [1] - 11:3
mid-September [1] - 11:3
might [4] - 4:3, 5:22, 5:24
minute [1] - 10:10
modifications [1] - 15:11
Monday [2] - 19:1, 19:7
months [4] - 5:13, 5:14, 5:25, 13:16
MOORE [2] - 1:25, 3:5
Moore [1] - 3:5
MORRIS [1] - 2:8
Morris [1] - 3:13
motion [1] - 3:25
move [2] - 9:3, 20:9
MR [11] - 3:5, 3:13, 6:22, 10:3, 10:23, 15:13, 19:3, 20:5, 21:10, 21:14, 21:17
MS [32] - 3:11, 4:2, 4:24, 5:13, 5:20, 6:17, 6:21, 7:4, 7:7, 8:3, 9:4, 9:14, 10:1, 10:9, 10:14, 10:20, 11:7, 11:11, 11:19, 11:24, 12:6, 12:10, 12:22, 13:11, 13:23, 14:12, 14:23, 15:2, 17:3, 19:5, 20:14, 20:18
multifaceted [1] - 5:1
must [1] - 19:13

N

name [2] - 16:4, 16:10
names [4] - 6:17, 6:24, 7:7, 17:19
necessarily [2] - 4:16, 6:5
necessary [2] - 12:14, 17:12
need [4] - 4:24, 5:6, 5:23, 8:10
needs [4] - 12:15, 13:3, 14:10, 17:15
negotiations [1] - 15:14
never [1] - 12:10
nice [2] - 8:18, 8:19
NICHOLS [1] - 2:8
Nichols [1] - 3:13
nilly [1] - 15:9
NO [1] - 1:4
Non [2] - 9:11, 10:16
non [2] - 9:16, 10:5
Non-infringement [2] - 9:11, 10:16
non-infringement [2] - 9:16, 10:5
normally [1] - 7:11
noticed [1] - 9:17
November [1] - 11:1
number [1] - 12:3
Number [2] - 6:23, 12:13
numbers [9] - 3:23, 9:10, 9:13, 9:21, 9:23, 10:21, 11:9, 11:12, 20:22

O

O'clock [1] - 1:7
o'clock [4] - 19:6, 19:10, 19:12, 21:13
object [1] - 6:21
objection [1] - 14:19
objections [1] - 14:25
obligated [1] - 20:1
occur [1] - 6:16
October [5] - 12:4, 12:5, 12:6, 12:7, 20:23
OF [2] - 1:2, 1:17
offensive [1] - 6:5
office [1] - 19:15
Official [1] - 2:17
One [2] - 4:6, 4:17
one [6] - 5:20, 6:23, 12:13, 19:15, 20:10, 20:11
operate [2] - 6:18
operation [1] - 15:1
Order [10] - 6:19, 7:9, 8:25, 10:25, 14:11, 15:1, 16:9, 16:13, 18:5, 20:2
order [3] - 8:11, 20:13, 21:15
ordering [1] - 18:12
organisms [9] - 6:7, 8:2, 12:9, 12:11, 13:18, 13:21, 18:13, 18:17, 18:23
outside [3] - 8:25, 9:1, 14:15
own [2] - 4:10, 7:17

P

p.m [2] - 1:7, 20:10
page [4] - 11:19, 11:22, 11:23, 18:21
pages [4] - 8:19, 10:19, 11:25, 20:24
paper [1] - 8:20
parameters [5] - 7:17, 7:18, 7:20, 7:22, 7:25
part [1] - 21:7
particular [1] - 16:5
particularly [1] - 21:7
parties [1] - 3:19
PAT [1] - 1:18
patent [1] - 4:8
pathway [3] - 5:2, 5:3, 8:16
people [2] - 18:5, 19:2
perhaps [1] - 4:2
period [1] - 14:19
person [2] - 16:8, 16:10
physical [1] - 3:21
place [1] - 19:19
Plaintiff [2] - 1:7, 1:24
plaintiff [1] - 11:5
plaintiff's [1] - 18:10
plan [2] - 13:24, 17:14
planning [3] - 9:25, 11:9, 20:25
plans [6] - 9:8, 13:4, 13:15, 14:5, 14:14, 17:19
point [5] - 4:12, 4:16, 8:10, 10:24, 15:6
portrayed [1] - 15:16
position [5] - 9:16, 10:5, 10:6, 12:12, 19:23
possible [4] - 9:22, 10:1, 11:13, 11:16
possibly [1] - 7:23
potential [2] - 14:18, 15:4
potentially [2] - 4:23, 5:11
Potter [1] - 3:6
POTTER [1] - 1:24
premature [1] - 12:13
probative [1] - 4:14
problem [1] - 21:1
problems [1] - 14:25
procedures [9] - 13:7, 13:25, 14:3, 14:7, 14:9, 15:9, 17:9, 17:17, 18:16
proceed [2] - 4:4, 4:5
processes [2] - 18:16, 19:25
produce [6] - 8:18, 11:25, 12:9, 12:11, 12:14, 17:14
produced [2] - 11:24, 20:25
producing [2] - 10:19, 13:3
product [2] - 7:12, 8:13
production [20] - 3:21, 7:21, 9:23, 10:2, 10:24, 11:1, 11:3, 11:6, 11:14, 11:17, 11:18, 11:20, 11:22, 11:23, 12:13, 15:17, 17:6, 17:11, 19:18
proposal [3] - 6:15, 6:25
propose [3] - 13:6, 15:22, 16:25
proposed [2] - 7:5, 14:17
proposing [2] - 10:12, 10:13
proprietary [2] - 12:25, 15:11
prosecute [1] - 9:2
Protective [8] - 6:19, 7:9, 8:25, 14:11, 15:1, 16:9, 16:13, 18:5
protocol [6] - 6:13, 6:15, 7:22, 8:10, 19:22, 19:24
protocols [4] - 6:2, 7:10, 15:18, 18:16
prove [2] - 6:11, 8:4
provide [7] - 7:14, 9:12, 9:21, 13:7, 18:18, 18:20, 18:21
provided [4] - 9:8, 9:10, 13:19, 21:6
put [1] - 15:6

Q

quite [1] - 17:23

R

ran [1] - 13:14
rather [1] - 4:10
realistically [1] - 6:1
reality [1] - 5:1
really [2] - 16:15, 20:15
reasons [1] - 12:13
rebuttal [1] - 13:8
recognize [1] - 6:9
recombinant [3] - 4:7, 4:20, 4:22
record [1] - 15:15
records [1] - 9:9
refer [1] - 9:19
reference [1] - 9:20
regard [1] - 6:14
regarding [3] - 13:20, 17:8, 20:2
relationship [1] - 20:2
rely [1] - 6:10
relying [2] - 4:10, 7:15
remaining [1] - 18:15

repeatedly [1] - 17:10
Reporter [2] - 2:16, 2:17
reports [3] - 12:16, 13:16, 17:14
reputable [1] - 16:3
request [2] - 15:16, 17:6
requested [5] - 13:2, 13:23, 13:25, 14:13, 17:13
requests [4] - 8:23, 9:14, 9:15, 10:16
required [1] - 12:9
requirements [1] - 15:20
resolution [1] - 16:16
respond [1] - 17:3
response [5] - 3:22, 3:24, 10:7, 10:14, 19:11
responses [9] - 9:7, 9:9, 9:18, 9:20, 9:24, 11:10, 12:3, 17:7, 17:8
results [3] - 7:17, 7:23, 13:15
review [3] - 13:2, 17:13, 18:24
Robinson [1] - 10:25
row [1] - 20:9
Rule [1] - 9:19
rules [1] - 8:9
run [6] - 6:16, 8:5, 14:22, 16:11, 17:16, 20:4
running [2] - 15:5, 18:1

S

safely [1] - 15:23
sample [1] - 13:5
samples [12] - 3:21, 8:23, 8:24, 12:14, 15:5, 15:17, 15:23, 16:6, 16:11, 17:9, 17:11, 17:19
Saturday [1] - 12:6
schedule [1] - 21:2
Scheduling [2] - 10:24, 20:2
SCHOLER [1] - 2:2
scientific [4] - 5:6, 12:16, 14:6, 17:14
scientifically [1] - 12:21
seal [1] - 19:13
see [6] - 5:14, 5:21, 5:23, 5:24, 16:6, 16:22
send [3] - 15:8, 20:12, 21:12
separate [1] - 20:13
September [5] - 1:5, 8:15, 10:9, 10:15, 11:3
served [5] - 8:22, 8:23, 15:16, 17:6, 17:7
set [2] - 5:14, 18:11
sign [1] - 7:8
signed [2] - 16:9, 16:13
simple [1] - 5:24
sitting [1] - 12:19
six [1] - 5:14
size [1] - 11:14
someone [1] - 4:3
sometime [2] - 8:19, 13:13
soon [4] - 9:22, 10:1, 11:13, 11:16
speaking [1] - 8:5
special [1] - 16:1
specific [8] - 9:8, 9:10, 9:21, 9:23, 10:21, 11:10, 12:3, 15:19
specifically [2] - 15:4, 18:4
stage [1] - 8:13
stall [2] - 16:15, 17:4
stalling [1] - 17:22
start [1] - 4:2
started [1] - 8:14
STATES [2] - 1:1, 1:19
still [5] - 16:17, 16:18, 17:1, 17:15
storage [6] - 13:7, 13:25, 14:4, 14:8, 15:25, 16:20
structural [1] - 4:12
structure [2] - 5:16, 5:18
stuff [1] - 20:7
submission [2] - 19:9, 19:14
submissions [1] - 19:8
submit [1] - 9:18
substantial [1] - 11:6
sufficient [1] - 20:4
supplement [8] - 3:22, 3:23, 9:9, 9:20, 10:7, 10:8, 10:14, 20:20
supplementation [1] - 9:7
suppose [1] - 18:11

T

table [1] - 7:25
tactic [2] - 16:15, 17:4
tech [1] - 8:24
technical [4] - 9:15, 12:16, 17:13, 21:6
TELECONFERENCE [1] - 1:17
teleconference [1] - 21:19
telephone [1] - 19:1
ten [1] - 17:20
test [5] - 5:11, 6:2, 6:13, 6:15, 8:7
testing [17] - 4:17, 4:18, 6:2, 6:11, 6:16, 7:6, 7:10, 7:16, 7:17, 7:18, 7:19, 7:22, 7:25, 13:22, 18:24, 19:25
tests [9] - 4:15, 5:15, 5:16, 6:10, 7:1, 8:3, 8:5, 18:1
THE [37] - 1:2, 1:18, 3:3, 3:9, 3:12, 3:17, 4:5, 5:9, 5:18, 6:1, 6:20, 7:13, 9:12, 9:25, 10:10, 10:17, 11:8, 11:18, 11:21, 11:25, 12:7, 12:18, 13:9, 13:17, 14:8, 14:21, 14:24, 17:23, 19:4, 19:6, 20:6, 20:16, 20:19, 21:9, 21:11, 21:15, 21:18
themselves [1] - 14:16
thereafter [1] - 8:19
they've [1] - 14:7
thinking [1] - 12:2
THOMAS [1] - 2:9
three [4] - 3:22, 5:13, 5:25, 18:21
Thursday [1] - 19:10
THYGNE [1] - 1:18
Thygne [1] - 3:4
timeline [1] - 17:5
timely [1] - 17:7
timing [2] - 5:5, 5:9
today [6] - 9:17, 11:24, 12:1, 17:14, 20:25, 21:3
together [1] - 18:11
Tom [3] - 3:13, 20:11, 21:9
tomorrow [1] - 14:20
TRANSCRIPT [1] - 1:17
transfer [2] - 13:20, 15:19
transferred [1] - 18:13
transport [1] - 7:2
treat [1] - 15:24
try [1] - 16:15
TUNNELL [1] - 2:8
Two [1] - 19:5
two [9] - 3:19, 6:17, 6:24, 7:8, 12:13, 13:16, 17:20, 19:4
type [3] - 6:2, 7:19, 12:18
types [2] - 7:1, 16:20

U

under [10] - 4:13, 6:18, 7:9, 7:17, 8:24, 10:24, 14:11, 16:1, 18:5, 19:13
underlying [1] - 8:7
understood [1] - 20:14
undertaking [2] - 7:9, 16:9
UNITED [2] - 1:1, 1:19
university [1] - 16:12
unpunished [1] - 11:2
up [8] - 4:6, 4:17, 6:3, 8:22, 13:9, 14:20, 18:11, 19:9

V

valuable [1] - 4:14
various [1] - 4:14

W

wait [2] - 10:10, 13:13
week [3] - 10:6, 14:17, 17:21
weekend [1] - 12:5
weeks [1] - 10:8
west [1] - 19:2
willing [2] - 12:22, 17:8
willy [1] - 15:9
willy-nilly [1] - 15:9
Wilmington [1] - 3:14
word [1] - 5:6
works [1] - 5:23
written [1] - 7:20

Y

yield [1] - 7:23