



Mail Stop 24
Director of the U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

May 23, 2023

Re: Reply to complaint of Heidi Morris, dated 03/13/2023

To whom it may concern;

This letter is in response to the above referenced complaint filed by Ms. Heidi Morris against Davison Design and Development, Inc. (Davison) on or about 03/13/2023. At the outset, it should be made clear that, as acknowledged in her complaint, Ms. Morris' issues have previously been resolved via arbitration. The current complaint is not seeking any further resolution, but misrepresents the Arbiter's decision by reciting a small portion of that decision.

As there are no issues to be addressed, a clarification of the Arbiter's decision is warranted. The Arbiter did not find any fraud or misrepresentation on Davison's behalf with regard to its disclosure requirements under the AIPA. While the Arbiter did find in Ms. Morris' favor, that determination related to the nature of the product sample designed and constructed pursuant to the contract terms. Specifically, on page 15 of the decision, the Arbiter held:

"I find, with respect to the required pre-contract disclosures under the AI[P]A, and the Consent Order, the materials provided by Davison to Ms. Morris, and Davison Design's communications with her, taken individually and in the aggregate, did not constitute or contain material or fraudulent misrepresentations or material omissions, about Davison Design track record or profit expectations, that caused her any injury, in violation of the American Inventors Protection Act."

All matters with Ms. Morris' project have been resolved. The complaint does not seek any further resolution. Accordingly, her file has been closed.

Sincerely,

David M. DeMay
Patent Counsel
Davison Design and Development, Inc.

Legal Department

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