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Datasheet for the decision
of 26 April 2007

Case Number: T 1578/05 – 3.5.03

Application Number: 98300811.1

Publication Number: 0866591

IPC: H04L 29/06

Language of the proceedings: EN

Title of invention:
Mechanism for embedding network based control systems in a
local network interface device

Applicant:
SUN MICROSYSTEMS, INC.

Opponent:
-

Headword:
Virtual machine network interface device/SUN

Relevant legal provisions:
EPC Art. 52(1), 56, 96, 113, 116
EPC R. 67
RPBA Art. 11(3)

Keyword:
"Inventive step - yes (2nd auxiliary request)"
"Procedural violation (no)"
"Discretionary powers wrongly exercised by the examining
division (no)"

Decisions cited:
T 0640/91, T 0682/91, T 0089/93, T 0144/94, T 0712/97,
T 0201/98, J 0018/96

Catchword:
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Boards of Appeal

Chambres de recours

Case Number: T 1578/05 **-** 3.5.03

D E C I S I O N
of the Technical Board of Appeal 3.5.03
of 26 April 2007

Appellant:	SUN MICROSYSTEMS, INC. 4150 Network Circle Santa Clara California 95054 (US)
Representative:	Harris, Ian Richard D Young & Co 120 Holborn London EC1N 2DY (GB)
Decision under appeal:	**Decision of the Examining Division of the European Patent Office posted 11 July 2005 refusing European application No. 98300811.1 pursuant to Article 97(1) EPC.**

Composition of the Board:

Chairman: A. S Clelland
Members: D. H. Rees
                  M-B. Tardo-Dino

Summary of Facts and Submissions

I.   This is an appeal against the decision of the examining
        division, announced at oral proceedings held in the
        absence of the appellant on 24 May 2005, with written
        reasons dispatched on 11 July 2005, to refuse patent
        application number 98 300 811.1, publication number
        0 866 591. The appellant had withdrawn its request for
        oral proceedings in a fax sent on 9 March 2005.

        The reason given for the refusal was that the subject-
        matter of claim 1 did not involve an inventive step
        with respect to the combination of the disclosures of
        documents

        D1: US 5 548 721 A and

        D2: EP 0 718 764 A.

II.   Notice of appeal was filed and the appeal fee paid on
        5 September 2005. A statement setting out the grounds
        of the appeal was submitted on 7 November 2005.

III.   The board issued a communication giving its preliminary
        views on the appeal and in particular raised objections
        of a lack of clarity (Article 84 EPC), a lack of
        support (Article 84 EPC) and a lack of disclosure how
        to carry out the invention in its full breadth
        (Article 83 EPC), a lack of an inventive step in the
        subject-matter of claim 1 (Articles 52(1) and 56 EPC)
        and a possible consequential lack of unity of invention
        (Article 82 EPC). The communication included an
        indication of subject-matter in the application which

appeared to the board not to be suggested by any of the
prior art documents to hand.

IV.   In response the appellant filed a new set of claims 1
        to 14. In accordance with the appellant's conditional
        request the board then issued a summons to oral
        proceedings to take place on 26 April 2007 together
        with a communication giving the board's preliminary
        opinion on the new claims. In preparation for the oral
        proceedings the appellant submitted on 23 March 2007
        amended description pages for a first auxiliary request
        and amended claims for a second auxiliary request. In a
        further submission dated 19 and received 23 April 2007
        the appellant informed the board that it would not be
        represented at the oral proceedings and made a further
        request combining the description and drawings of the
        first auxiliary request and the claims of the second
        auxiliary request.

V.   The sole independent claim of the main request reads as
        follows:

        "A network interface device (401) providing a physical
        and logical connection between a network station and a
        network medium utilized by a network (440), said
        network interface device (401) comprising:

        a host bus interface circuit (410) coupled to said
        network station;
        a network interface circuit (416) coupled to said
        network medium;
        and characterised by:
        an embedded virtual machine (402) coupled to said
        network interface circuit (416) and said host bus

interface circuit, said embedded virtual machine providing a secure program execution environment for said network interface device (401), wherein said virtual machine intercepts packets travelling between the host interface circuit and the network interface circuit."

The independent claim of the first auxiliary request is identical with that of the main request - only the description has been changed.

The independent claim of the second auxiliary request adds the following final feature:

"and wherein said virtual machine allows the network interface device to safely and reliably contain state information or code from said network."

The independent claim of the third auxiliary request is identical with that of the second auxiliary request - again only the description has been changed.

VI.   The appellant requests that the decision under appeal be set aside and a patent be granted on the basis of

      claims 1 to 14 of the main and first auxiliary request filed on 15 September 2006 or alternatively, for the second and third auxiliary requests, claims 1 and 2 filed on 23 March 2007 and claims 3 to 14 filed on 15 September 2006;

      description
      page 4 filed with a letter dated 10 and received 14 January 2002,

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pages 1 to 3 and 5 to 29 as originally filed for the
main and second auxiliary request, or alternatively for
the first and third auxiliary requests
pages 8 and 9 filed on 23 March 2007 and
pages 1 to 3, 5 to 7 and 10 to 29 as originally filed;

drawing sheets 1 to 10 filed with a letter dated 23 and
received 26 February 1998,

In the alternative the appellant requests that the case
be remitted to the examining division for further
prosecution.

The appellant also requests refund of the appeal fee in
accordance with Rule 67 EPC.

VII.   The appellant was not represented at the oral
        proceedings, during which the board deliberated and the
        chairman announced the decision taken.

Reasons for the Decision

1.   *Reasons for holding the oral proceedings in the
        appellant's absence*

1.1   According to Article 116(1) EPC, oral proceedings shall
        take place either at the instance of the European
        Patent Office if it considers this to be expedient or
        at the request of any party to the proceedings. Oral
        proceedings are an effective way to discuss cases
        mature for decision, since the appellant is given the
        opportunity to present its concluding comments on the
        outstanding issues (Article 113(1) EPC), and a decision

can be made at the end of the oral proceedings
(Rule 68(1) EPC).

1.2   The need for procedural economy dictates that the board
        should reach its decision as quickly as possible while
        giving the appellant a fair chance to argue its case.
        In the present appeal the holding of oral proceedings
        was considered by the board to meet both these
        requirements. The appellant had also made a conditional
        request for oral proceedings. A summons was therefore
        issued.

1.3   In accordance with Article 11(3) of the Rules of
        Procedure of the Boards of Appeal the board shall not
        be obliged to delay any step in the proceedings,
        including its decision, by reason only of the absence
        at the oral proceedings of any party duly summoned who
        may then be treated as relying on its written case. The
        board considered that, despite the appellant's
        announced intention not to attend, the twin
        requirements of fairness and procedural economy were
        still best served by holding the oral proceedings as
        scheduled.

1.4   The board considers that its reasons for coming to its
        decision do not constitute a departure from grounds or
        evidence previously put forward, requiring that the
        appellant be given a further opportunity to comment.
        The board concludes that Article 113(1) EPC has been
        satisfied and it was therefore in a position to make
        its decision at the oral proceedings.

2.   *The main and first auxiliary request - inventive step*

2.1   Since the board's reasoning applies equally to the main
        and the first auxiliary requests they will be dealt
        with together. The wording of the independent claim of
        each of these requests is identical; the description of
        the first auxiliary request has been amended to exclude
        the possibility that the instructions may be performed
        directly by the processing unit, i.e. without an
        interpreter, as specified in column 4, lines 42 to 45
        of the published application.

2.2   The appellant did not attempt to rebut the board's view,
        given in its communication of 15 May 2006 at points 6.1
        and 6.2 that document D1 discloses a network interface
        device, namely a secure network access port (SNAP)
        together with a modem or LAN interface circuit,
        satisfying the requirements of the pre-characterising
        portion of claim 1. The board further considers the
        feature of "intercept[ing] packets travelling between
        the host interface circuit and the network interface
        circuit," to be intrinsic to any network interface
        device, since it has to reformat data between the
        formats required for communication with the host and
        communication over the network.

2.3   It is clear that any network device which can accept
        and execute commands (whether from the host or the
        network is immaterial at this point) must include means
        for interpreting and executing those commands. The
        network interface device of D1 can interpret and
        execute commands - see e.g. D1 column 4, lines 52 to 55.
        Moreover D1 emphasises that it is concerned with

carrying out operations securely (column 1, lines 8 to
15).

2.4   The skilled person is faced with the problem of how to
        provide the means for interpreting and executing the
        commands, as well as for carrying out other intrinsic
        functions of a network interface device such as
        formatting packets appropriately to be carried by the
        network and giving those messages to the network
        interface. In a system for carrying out secure
        operations, such as D1, it is clear that the skilled
        person must seek ways to make sure these means behave
        securely. It almost goes without saying that the
        skilled person will consider a digital processor
        executing programs as implementation means. The skilled
        person is clearly also aware that there are plural ways
        of executing programs, including interpreters. D2
        offers a kind of interpreter, a "virtual machine" in
        the terms of the present application (compare e.g.
        column 6, lines 28 to 32 of the published application
        and D2 page 8, lines 26 to 29), which is particularly
        aimed at ensuring that the programs execute securely -
        see D2, page 2, lines 25 and 26, where it is stated
        that "it is virtually impossible using prior art tools
        to determine whether the downloaded program 103 will
        underflow or overflow its stack, or whether the
        downloaded program 103 will violate files and other
        resources on the user's computer." D2 is aimed at
        overcoming this problem. It is true that D2 is
        specifically concerned with the problem of ensuring the
        security of executing programs which have been received
        from a remote source, but that would not stop the
        skilled person from recognising this document's
        relevance to any environment in which the secure

execution of programs is of importance, and in
particular to the network interface device of D1. Thus
the skilled person would be motivated to use the
virtual machine of D2 in the network interface device
of D1.

2.5   The term "embedded", used in claim 1, merely means pre-
       loaded (for example in ROM or Flash memory), as
       compared to e.g. loaded from disk on device start-up.
       It is usual for the programs which execute the
       functions of peripheral devices such as network
       interface devices, which in this case would include the
       virtual machine of D2, to be "embedded".

2.6   The appellant has argued (see sections 5 and 6 of the
       appellant's submission of 23 March 2007) that the
       skilled person would not combine D1 and D2 and in
       particular not in a way which would lead to the claimed
       subject-matter. It is argued that the "SNAP" of D1 does
       not employ an interpreter in the sense that that word
       is used in the application. However the board considers,
       for the reasons given in point 2.4 above, that the
       skilled person would be motivated to replace the means
       for executing programs in D1, whatever they are, by the
       interpreter and other elements of the virtual machine
       disclosed in D2. Thus it is of no significance that D1
       does not disclose an interpreter in the sense of the
       application.

       The appellant further argues that D2 does not use the
       term "secure" for its interpreter and that its teaching
       is limited to solving problems of stack overflow and
       underflow rather than any general improvement in
       overall security. However the appellant also concedes

that stack overflow and underflow is a security issue;
the board considers that the skilled person would
recognise this and therefore also recognise the
relevance of the teaching of D2 to D1.

The appellant also suggests that stack over- and
underflow is not a problem in D1 (points 6.2 and 8 of
the appellant's submission). The board does not follow
this argument; even if the programs which run in the
network interface device of D1 come from an absolutely
trusted source there is always the danger of insecure
behaviour as a result of software bugs and the skilled
person is only too aware of this.

It is further mentioned that D2 concerns programs
downloaded over a network. The board has already given
its reasons for considering that this is not relevant
(point 2.4 above).

2.7   Hence the subject-matter of the independent claim of
        both the main and the first auxiliary request does not
        involve an inventive step and these requests are in
        consequence not allowable.

3.   *The second auxiliary request*

3.1   Added subject-matter (Article 123(2) EPC)

3.1.1   The subject-matter of the present independent claim is
        disclosed by claim 1 as originally filed in combination
        with Fig. 4, column 6, lines 40 to 49, column 7,
        lines 2 to 12 and column 8, lines 45 to 56 of the
        application as published. The board notes that the term
        "virtual machine" appears only to be used in the

application as filed in combination with "Java".
However it considers that the reference at column 7,
lines 4 to 12 to the use of other "robust environments"
for the implementation of the invention would be
understood by the skilled person as meaning that it
encompassed other virtual machines.

3.1.2   The dependent claims are based directly on original
        claims with amendments to make the terminology
        compatible with claim 1 (see the "manuscript copy"
        filed on 15 September 2006).

3.1.3   The only amendments to the original description are an
        acknowledgement of the cited prior art and a statement
        of invention brought into line with the claims.

3.1.4   The board concludes that the requirements of
        Article 123(2) EPC are satisfied.

3.2   Clarity

3.2.1   Claim 1 of this request includes, as do the independent
        claim of all requests, a "virtual machine". The skilled
        person would understand a virtual machine to be a self-
        contained operating environment within a computer which
        behaves as if it were a separate computer. However the
        description includes the possibility that the
        downloaded instructions may be performed directly by
        the processing unit (column 4, lines 44 and 45) and
        also that the "virtual machine" may be implemented by
        "JavaOS", an operating system, running on a "Sun Java
        chip" (column 7, lines 30 to 35). These passages imply
        that in at least some cases the "virtual machine" is in

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fact the real machine with an appropriate operating
system.

The board considers that the idea of designing
processors to execute directly code which is normally
interpreted, such as Pascal p-code (a spiritual
ancestor of Java byte-code) or Forth, is an old one.
The skilled person would therefore be aware that the
use of the expression "virtual machine" would not
normally be intended to exclude an implementation as a
"real" machine. This feature of the claims is therefore
clear.

3.2.2   The terms "secure", "safe" and "reliable" are relative;
        absolute security, safety or reliability is a mirage.
        The skilled person would understand these terms in
        their context to relate to a system in which special
        steps of whatever kind have been taken to improve these
        qualities as compared to a system in which no such
        steps have been taken. The board therefore considers
        the use of these terms to be clear in this particular
        case.

3.2.3   Further objections of lack of clarity which were raised
        during the appeal procedure do not apply to the present
        claims. The board therefore considers that the
        requirement of Article 84 for clarity is satisfied.

3.3   Novelty and inventive step

3.3.1   A conventional network interface device as known to the
        skilled person at the present priority date would
        contain programs to execute a limited set of commands
        given to it by its host network station or received

over the network (connection requests for example), and
to carry out the normal network interface functions of
formatting and dispatching data, etc.. These programs
would normally be stored in read-only or non-volatile
memory ("firmware"). They would either not be
modifiable at all in normal use (which would probably
be the case in D1, given that the requirement for
security extends to misuse by the network station user),
or at most they would be modifiable in the form of an
upgrade initiated by and under control of the host.

3.3.2   Independent claim 1 includes the feature, "wherein said
        virtual machine allows the network interface to safely
        and reliably contain state information or code from
        said network." The present invention thus allows the
        behaviour of the network interface device to be
        modified directly over the network, without the host
        being involved, by giving it state information or code
        from a remote source. In the board's view the skilled
        person would not in general consider such a possibility;
        if presented with it in the context of a conventional
        network interface device without special security
        features, the dangers would immediately be apparent,
        and it would be rejected as a practical course of
        action. The invention overcomes the potential dangers
        (at least to some extent) by its use of security
        features for "secure program execution".

3.3.3   Thus while a combination of D1 and D2 would make the
        invention possible, in the board's view it would not
        occur to the skilled person to configure this
        combination "to safely and reliably contain state
        information or code from said network," because it
        would be alien to the way in which he or she would

normally consider the function of a network interface
device. In other words the skilled person would be
technically prejudiced against the claimed subject-
matter.

3.3.4   The board therefore concludes that the subject-matter
        claimed is novel and involves an inventive step.

3.4   No other objections which would apply to this request
        have been raised, nor are any apparent to the board.
        The board concludes that this request is allowable.

4.   Since the second auxiliary request is allowable it is
        not necessary to discuss the third auxiliary request.

5.   *Refund of the appeal fee*

5.1   The appellant alleged that several procedural
        violations took place during examination, the
        circumstances of which can be summarised as follows.

5.1.1   According to the appellant's statement of grounds of
        appeal the examining division failed to comply with the
        requirements of Rule 51(3) EPC by making significant
        changes in its position without acknowledgement or
        justification in its second and third communications,
        by dismissing without proper consideration important
        arguments raised by the appellant in the second
        communication and by linking the inventive step
        requirement (Article 56 EPC) with Rule 27(1)(b) EPC in
        a manner completely contrary to EPO law and practice.
        It further submitted that the oral proceedings held by
        the examining division even though the appellant had
        withdrawn its request had no legal basis.

5.1.2   In its submissions dated 23 March 2007 the appellant
        further stated that contrary to the assumptions of the
        board as set out in its communication of 15 May 2006
        the appellant's arguments did not concern a violation
        of Article 113 EPC but rather violation of Articles 125,
        96 and 116 EPC. More precisely it contested on two
        specific issues the preliminary opinion expressed by
        the board that no procedural violation had taken place.

5.1.3   Firstly the fact that the examining division did not
        identify the relevant passages in D2 deprived the
        appellant of a complete knowledge of the case and
        generated uncertainty which caused additional work and
        expense. In the appellant's view this would have
        resulted in a violation of Article 113 EPC if the
        examining division had relied on these "more relevant"
        parts in the oral proceedings but since it did not the
        issue rather amounted to a breach of Article 125 EPC
        insofar as there was a lack of compliance with the
        general principle that a party was entitled to hear the
        complete case against it.

5.1.4   Secondly the appellant submitted that the examining
        division had changed its reasoning dramatically in the
        summons to oral proceedings. In such circumstances the
        division should not have appointed oral proceedings at
        that stage but rather issued a new communication
        pursuant to Article 96 EPC. The opportunity for an
        applicant to comment on and answer new reasoning during
        oral proceedings does not offer the same advantages as
        a written communication, this opportunity being
        potentially limited by the provisions of Rule 71a(2)
        EPC.

5.1.5   The appellant further paraphrased the board's view as
        being that "a procedural violation is not 'substantial'
        if the applicant does not suffer significant damage as
        a result of this particular violation," (appellant's
        submission of 23 March 2007, point 13.1). It was
        submitted that this view must be incorrect because such
        a principle would leave it to the discretion of the EPO
        whether or not to follow the procedure set out in the
        EPC as long as the decision reached was correct.

5.2   According to Rule 67 EPC reimbursement of the appeal
        fee shall be ordered where the board deems an appeal to
        be allowable, if such reimbursement is equitable by
        reason of a substantial procedural violation.

5.2.1   In its final written submissions the appellant argued
        that it had not heard the full case against it because
        the examining division mentioned passages in D2 without
        specifying which and changed its reasoning in the
        summons to oral proceedings without issuing a further
        communication pursuant to Article 96 EPC. In the
        appellant's view this is not a violation of Article 113
        EPC but of Articles 125 and 96 EPC and, to put it in a
        more general way, the department of first instance did
        not abide by the procedural law of the EPC.

        First the board notes that Article 125 EPC *per se* does
        not provide any direct provision but refers to
        "principles of procedural law generally recognised in
        the Contracting States," to be taken into account "in
        the absence of procedural provisions in [the EPC]." The
        principle explicitly mentioned by the appellant, the
        right to hear the full case against it, seems to the

board to be nothing other than the principle enshrined
in Article 113 EPC, according to which "decisions of
the European Patent Office may only be based on grounds
or evidence on which the parties concerned have had an
opportunity to present their comments." As the
appellant concedes this principle was not violated
since the examining division did not use any previously
unquoted passages of document D2 in its decision.
Rather the actual complaint of the appellant concerns
the way in which the examining division acted and
exercised its discretionary powers, allegedly making it
difficult for the appellant to make its case, thus
causing the appellant considerable additional work and
expense.

Article 96 EPC requires from the department of first
instance that it offers the applicant the opportunity
to comment on its observations "as often as necessary".
However this article and Rule 51 EPC leave the
examining division discretion to assess when such an
opportunity is "necessary". Thus the "right" or "wrong"
application of this provision depends on the context of
the case. According to the established case law (see
for example T 201/98, not published, at point 1 of the
Reasons, or T 640/91, OJ 1994, 918, at point 4) a board
of appeal should overrule the way in which the
department of first instance has exercised its
discretion in a decision in a particular case if the
board comes to the conclusion that the department of
first instance did so according to the wrong principles,
without taking into account the right principles, or in
an unreasonable way.

Among these principles compliance with Article 113 EPC
is by far the most important. However, ceding that this
principle was complied with, the appellant is reduced
to a complaint that it faced additional work and
expense, without showing that any such additional work
was so unusual or exaggerated that it could be said to
cause damage. The appellant, in the clear expectation
that the application would be refused, chose not to
attend the oral proceedings appointed by the examining
division - see the appellant's fax of 9 March 2005.
Whether the refusal would subsequently be based on the
arguments put forward in the communication accompanying
the summons to oral proceedings, as they in fact were,
or on other considerations was immaterial at that stage
since the appellant chose not to attend. Equally in
preparing grounds of appeal it was clearly unnecessary
for the purposes of overcoming the reasons for the
decision to refuse the application even to mention the
fact that at one stage in the procedure passages of
document D2 had been referred to without being
identified. The decision to raise this point and to do
any additional work involved was that of the appellant
alone. Thus there is no concrete fact which can lead
the board to conclude that there was an unreasonable or
wrong exercise of discretion on the part of the
examining division.

5.2.2   Turning now to the question of whether and when the
examining division considers it expedient to hold oral
proceedings and put an end to the written phase of the
procedure, the appellant argues that since it had
changed its reasoning the department of first instance
should not have issued a summons to oral proceedings
but rather have issued a new communication with a time

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limit for written response. In the present case, even
if the board agrees that the examining division's
arguments in the communication accompanying the summons
to oral proceedings represented a fundamental change in
the reasons for rejecting the application, it notes
that the appellant maintained its previous arguments in
its written response to the summons, simply adding its
conviction that the Board of Appeal would follow them.
When it withdrew its request for oral proceedings two
other courses of action were possible. On the one hand
the appellant might have been of the opinion that the
interval between the issuance of the summons and the
date set according to Rule 71a(1) EPC was too short for
the preparation of a proper response. If the appellant
believed this to be the case it had the right to draw
the examining division's attention to the fact that it
needed more time to file appropriate requests and
arguments to overcome the new objections. Nobody can
now say what would have happened if the appellant had
followed this course of action. If on the other hand,
as seems more likely, there was enough time to prepare
a detailed response, it was still possible to attempt
to overcome the deficiencies standing in the way of
grant of a patent. The appellant chose neither of these
options, preferring to make its case first in appeal.
Thus, referring to the established case law, the
appellant made no serious attempt to overcome the
objections which had been raised (see for example
T 89/93, not published, at point 9). In the absence of
reaction at that stage, the appellant cannot argue that
it was not in a position to hear the full case against
it.

5.2.3   As to the second alleged procedural violation, the
        examining division's choice to hold the oral
        proceedings despite its changed arguments and the
        appellant's withdrawal of its request, the appellant
        argued that there was no legal basis for holding the
        oral proceedings under these circumstances.

        In response it is sufficient to note that Article 116
        EPC provides that oral proceedings may be initiated by
        the EPO when it is expedient to do so and to cite
        point 3) of the communication dated 8 February 2005
        accompanying the summons to oral proceedings, where the
        examining division explained that it considered it
        expedient to schedule oral proceedings at that stage
        ("The examining division considers it procedurally
        efficient in this case to issue a summons to Oral
        Proceedings in order to conclude the proceedings.")
        Maintaining the date for oral proceedings was a course
        of action taken by the examining division within the
        discretion conferred upon it by the EPC. The choice of
        the appellant not to file new arguments or requests
        makes it impossible to conclude now that the examining
        division misused that discretion.

5.2.4   For the sake of completeness, even if the board had
        concluded that there was a procedural violation it
        would not have ordered a refund of the appeal fee since
        Rule 67 EPC requires that the refund must be equitable
        by reason of a substantial procedural violation. The
        course of action taken by the examining division was
        not detrimental to the case of the appellant and had no
        effect upon the decision - see, in the same line,
        decisions T 712/97 at point 2 and T 682/91 at point 4,
        neither published. In addition the reimbursement would

not be equitable because the appellant made no serious
attempt to overcome the objections raised in the
summons to oral proceedings and did not use the
opportunities available to exercise fully its right to
be heard; hence it contributed to the alleged
procedural violation - see for instance J 18/96, OJ
1998, 403.

5.2.5   As to the other complaints set out in the grounds of
appeal, they all concern the assessment of substantive
issues by the examining division. Such issues are not a
matter of procedural violation but rather a proper
matter for appeal against the findings of the decision
(for instance T 144/94, unpublished, at point 4).

5.3   For these reasons the request for refund of the appeal
fee is refused.

Order

For these reasons it is decided that:

1.   The decision under appeal is set aside.

2.   The request for reimbursement of the appeal fee is
        refused.

3.   The case is remitted to the department of first
        instance with the order to grant a patent on the basis
        of the second auxiliary request.

The Registrar   The Chairman

D. Magliano   A. S. Clelland

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