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CENTRAL DIST. OF CALIF.  
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Joseph Hamilton, Bar No. 211544  
JHamilton@perkinscoie.com  
PERKINS COIE LLP  
1888 Century Park East, Suite 1700  
Los Angeles, CA 90067-1721  
Telephone: 310.788.9900  
Facsimile: 310.788.3399

Attorneys for Plaintiff  
SALSNES FILTER AS

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

SALSNES FILTER AS, a Norwegian  
corporation,

Plaintiff,

v.

M2 RENEWABLES, INC., a Delaware  
corporation; and NEPSUS  
ENVIRONMENTAL LLC, an Arizona  
Limited Liability Company,

Defendants.

Case No. **SAC V11-01239 JVS(AN)**

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

1 Salsnes Filter AS (“Salsnes”) alleges:

2 **JURISDICTION AND VENUE**

3 1. This is an action for patent infringement under Title 35 of the United  
4 States Code. The Court has federal question jurisdiction under 28 U.S.C. § 1331,  
5 and exclusive original jurisdiction under 28 U.S.C. § 1338(a).

6 2. Venue properly lies in this district pursuant to 28 U.S.C. §§ 1391(b),  
7 1391(c) and 1400(b). The defendants are subject to personal jurisdiction in this  
8 judicial district. Salsnes is informed and believes and thereon alleges that  
9 defendant M2 Renewables, Inc.’s (“M2R”) principal place of business is within this  
10 judicial district, that defendant M2R has systematic and not isolated activities  
11 within this judicial district, and that defendant M2R has committed acts of patent  
12 infringement, as set forth in the First Claim for Relief herein, within this judicial  
13 district. Salsnes is informed and believes and thereon alleges that defendant Nepsus  
14 Environmental LLC (“Nepsus”) has systematic and not isolated activities within  
15 this judicial district and that defendant Nepsus has committed acts of patent  
16 infringement, as set forth in the Second Claim for Relief herein, within this judicial  
17 district.

18 **PARTIES**

19 3. Salsnes is a corporation organized and existing under the laws of  
20 Norway with its principal place of business in Namsos, Norway. Salsnes is a  
21 leading provider of filter technology for primary wastewater treatment and sludge  
22 dewatering.

23 4. Salsnes is informed and believes and thereon alleges that Defendant  
24 M2R is a Delaware corporation with its principal place of business in Lake Forest,  
25 California.

26 5. Salsnes is informed and believes and thereon alleges that Defendant  
27 Nepsus is an Arizona limited liability company with its principal place of business  
28 in Tempe, Arizona.

**FIRST CLAIM FOR RELIEF**

*(Infringement of U.S. Patent No. 6,942,786 by M2R)*

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3       6.     U.S. Patent No. 6,942,786 (“the ’786 patent”), entitled *Cleaning*  
4 *Device for Waste Water*, issued on September 13, 2005. Salsnes owns all right and  
5 title to the ’786 patent. A true and correct copy of the ’786 patent is attached as  
6 Exhibit “1.”

7       7.     Salsnes is informed and believes and thereon alleges that M2R has  
8 infringed, and will continue to infringe, one or more claims of the ’786 patent  
9 directly, contributorily, or by inducement by making, using, selling, or offering to  
10 sell in this country (including this judicial district), a cleaning device for waste  
11 water. Examples of cleaning devices for waste water that infringe include, but are  
12 not limited to, the M2R Microscreen.

13       8.     Salsnes is informed and believes and thereon alleges that M2R has  
14 committed the aforementioned acts of infringement of the ’786 patent in connection  
15 with the installation identified as the City of Adelanto, California waste water  
16 treatment plant that includes the M2R Microscreen.

17       9.     Salsnes is informed and believes and thereon alleges that M2R has  
18 committed the aforementioned acts of infringement of the ’786 patent in connection  
19 with the installation identified as the ProLogis-Fontana, California Kaiser Steel  
20 waste water treatment plant that includes the M2R Microscreen.

21       10.    Salsnes is informed and believes and thereon alleges that M2R’s  
22 infringement of the ’786 patent is willful. As a result, Salsnes is entitled to  
23 increased damages under 35 U.S.C. § 284 and to its attorneys’ fees incurred in  
24 prosecuting this action under 35 U.S.C. § 285.

25       11.    Salsnes has been, and will continue to be damaged by M2R’s  
26 infringement of the ’786 patent, and has been and will be, irreparably harmed  
27 unless M2R’s infringement is enjoined.  
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**SECOND CLAIM FOR RELIEF**

*(Infringement of U.S. Patent No. 6,942,786 by Nepsus)*

12. Salsnes incorporates paragraphs 1 through 6, above.

13. Salsnes is informed and believes and thereon alleges that Nepsus has infringed, and will continue to infringe, one or more claims of the '786 patent directly, contributorily, or by inducement by making, using, selling, or offering to sell in this country (including this judicial district), a cleaning device for waste water. Examples of cleaning devices for waste water that infringe include, but are not limited to, the "Preliminary Separator" as used in the "Nepsus CBUM Process."

14. Salsnes is informed and believes and thereon alleges that Nepsus has committed the aforementioned acts of infringement of the '786 patent in connection with an installation identified as the City of Adelanto, California waste water treatment plant that includes the "Preliminary Separator" as used in the "Nepsus CBUM Process."

15. Salsnes is informed and believes and thereon alleges that Nepsus' infringement of the '786 patent is willful. As a result, Salsnes is entitled to increased damages under 35 U.S.C. § 284 and to its attorneys' fees incurred in prosecuting this action under 35 U.S.C. § 285.

16. Salsnes has been, and will continue to be damaged by Nepsus' infringement of the '786 patent, and has been and will be, irreparably harmed unless Nepsus' infringement is enjoined.

**PRAYER FOR RELIEF**

WHEREFORE, Salsnes requests the following relief:

On the *First Claim for Relief*,

A. A judgment that M2R infringes the '786 patent;

B. A permanent injunction enjoining and restraining M2R and its officers, agents, attorneys, and employees, and those acting in privity or concert with them from infringing the '786 patent for its full term;

1 C. An award of damages to Salsnes including pre-judgment and post-  
2 judgment interest in an amount adequate to compensate Salsnes for M2R's  
3 infringement of the '786 patent, and, if willful infringement is shown, that the  
4 damages be trebled pursuant to 35 U.S.C. § 284;

5 On the *Second Claim for Relief*,

6 D. A judgment that Nepsus infringes the '786 patent;

7 E. A permanent injunction enjoining and restraining Nepsus and its  
8 officers, agents, attorneys, and employees, and those acting in privity or concert  
9 with them from infringing the '786 patent for its full term;

10 F. An award of damages to Salsnes including pre-judgment and post-  
11 judgment interest in an amount adequate to compensate Salsnes for Nepsus'  
12 infringement of the '786 patent, and, if willful infringement is shown, that the  
13 damages be trebled pursuant to 35 U.S.C. § 284;

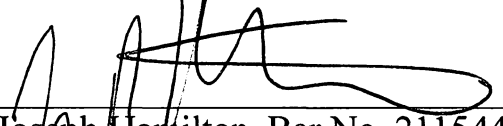
14 On all *Claims for Relief*,

15 G. For a declaration that this is an exceptional case and an award of  
16 Salsnes' costs, disbursements, and attorneys' fees incurred in this action, including  
17 attorneys' fees pursuant to 35 U.S.C. § 285; and

18 H. Any other and further relief this Court may deem just and proper.  
19

20 DATED: August 18, 2011

**PERKINS COIE LLP**

21 By:   
22 Joseph Hamilton, Bar No. 211544  
23 JHamilton@perkinscoie.com

24 Attorneys for Plaintiff  
25 SALSNES FILTER AS  
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**DEMAND FOR JURY TRIAL**

Salsnes hereby demands a jury trial.

DATED: August 18, 2011

**PERKINS COIE LLP**

By: 

Joseph Hamilton, Bar No. 211544  
JHamilton@perkinscoie.com

Attorneys for Plaintiff  
SALSNES FILTER AS

# Exhibit 1



(12) **United States Patent**  
**Fosseng**

(10) **Patent No.:** **US 6,942,786 B1**  
(45) **Date of Patent:** **Sep. 13, 2005**

(54) **CLEANING DEVICE FOR WASTE WATER**

FOREIGN PATENT DOCUMENTS

(75) Inventor: **Audun Fosseng**, Salsnes (NO)

FR	1352960	1/1964
WO	WO87/02266	4/1987
WO	WO94/26387	11/1994

(73) Assignee: **Salsnes Filter AS**, Salsnes (NO)

\* cited by examiner

(\* ) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days.

*Primary Examiner*—Terry K. Cecil  
(74) *Attorney, Agent, or Firm*—Bracewell & Giuliani LLP

(21) Appl. No.: **10/182,971**

(57) **ABSTRACT**

(22) PCT Filed: **Feb. 3, 2000**

(86) PCT No.: **PCT/NO00/00032**

§ 371 (c)(1),  
(2), (4) Date: **Oct. 7, 2002**

(87) PCT Pub. No.: **WO01/56681**

PCT Pub. Date: **Aug. 9, 2001**

(51) **Int. Cl.**<sup>7</sup> ..... **B01D 33/04**; B01D 33/048

(52) **U.S. Cl.** ..... **210/97**; 210/391; 210/393;  
210/400; 210/401; 239/597; 239/601

(58) **Field of Search** ..... 210/400, 401,  
210/391, 407, 408, 409, 410, 411, 108, 86,  
210/393, 97; 239/597, 601

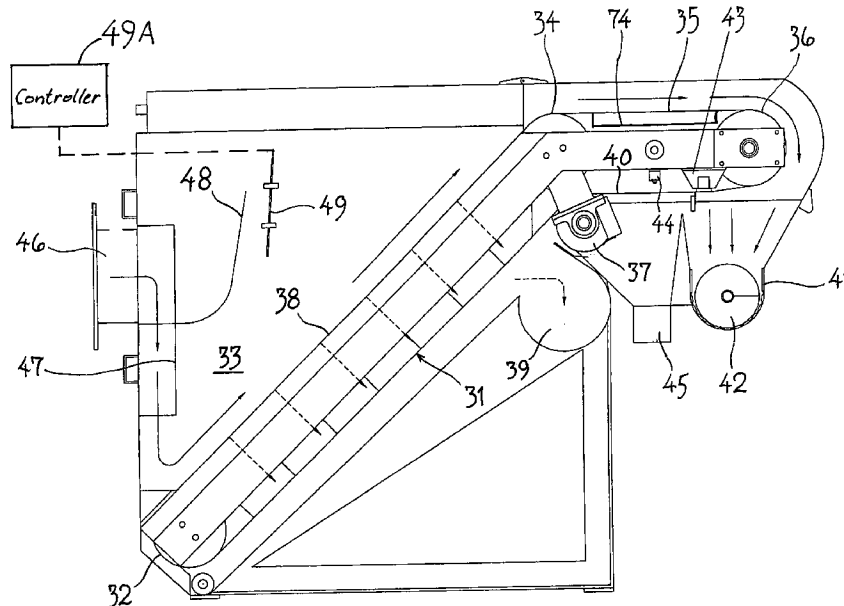
Cleaning device having an endless filtering belt (31) guided through a waste water container (33) for filtering of waste water. The filtering belt is guided over a series turn rollers (32, 34, 36, 37) so that the belt in a certain region runs substantially horizontally with the filtrate faced downwards. Within this region there is a rod shaped blowoff device (43) for blowing air towards the filtering belt. Below the blowoff device (44) there is arranged a screw conveyor (42) for removing residues dislodged from the filter mesh. The filtering belt (31) is located adjacent to a transmission belt (51) and is pressed against the same by a clamping rail (58) within the rising section (38) of the filtering belt. The device is provided with a control device (4) adapting the filtering belt movement with the waste water supply, thus keeping the waste water surface below a certain level to provide a high degree of dewatering within the upwards rising section of the filtering belt (31). The blowoff device (43) is shaped to produce a knife shaped air beam directed towards the filtering belt from a sufficiently short distance to effect substantially full penetration through the openings of the filtering belt. The lateral edges of the filtering belt are covered by a tight cover band (66) pressed downwards by a soft elastic pressure lip (64).

(56) **References Cited**

U.S. PATENT DOCUMENTS

3,012,677	A *	12/1961	Hungate	.....	210/107
3,464,563	A *	9/1969	Gonzalez et al.	.....	210/400
4,008,158	A *	2/1977	Davis	.....	210/386
4,242,205	A *	12/1980	Hirs	.....	210/400
4,468,320	A *	8/1984	Schmidt	.....	210/97
5,202,017	A	4/1993	Hunter		

**6 Claims, 4 Drawing Sheets**



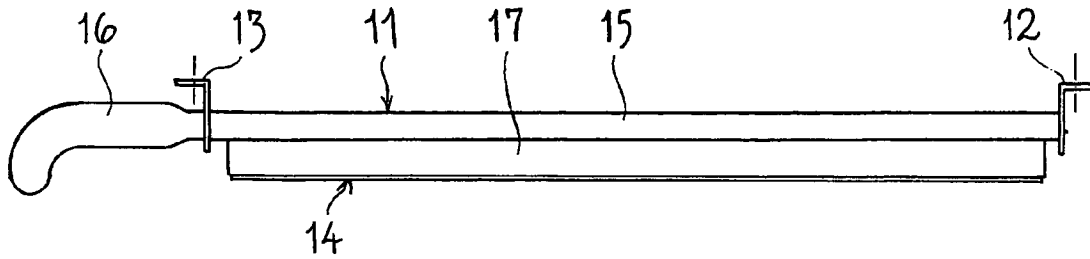


Fig. 1

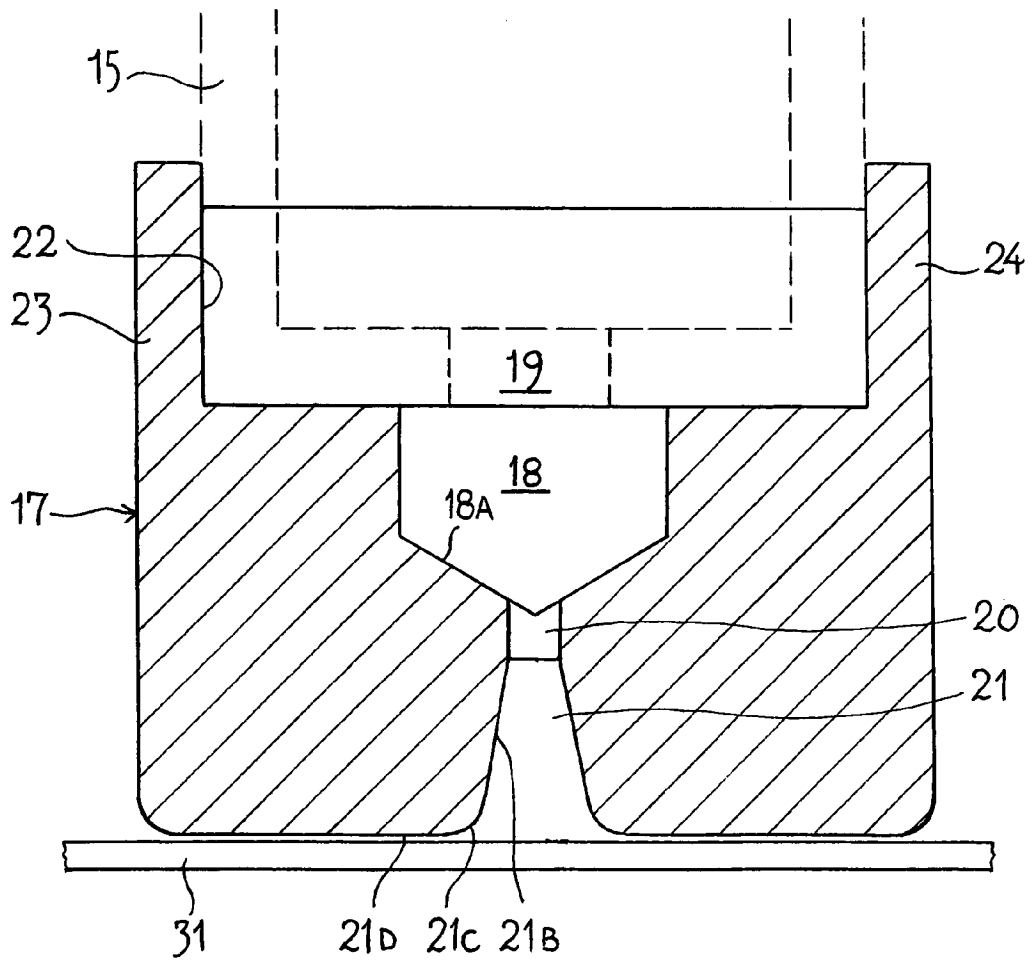


Fig. 2

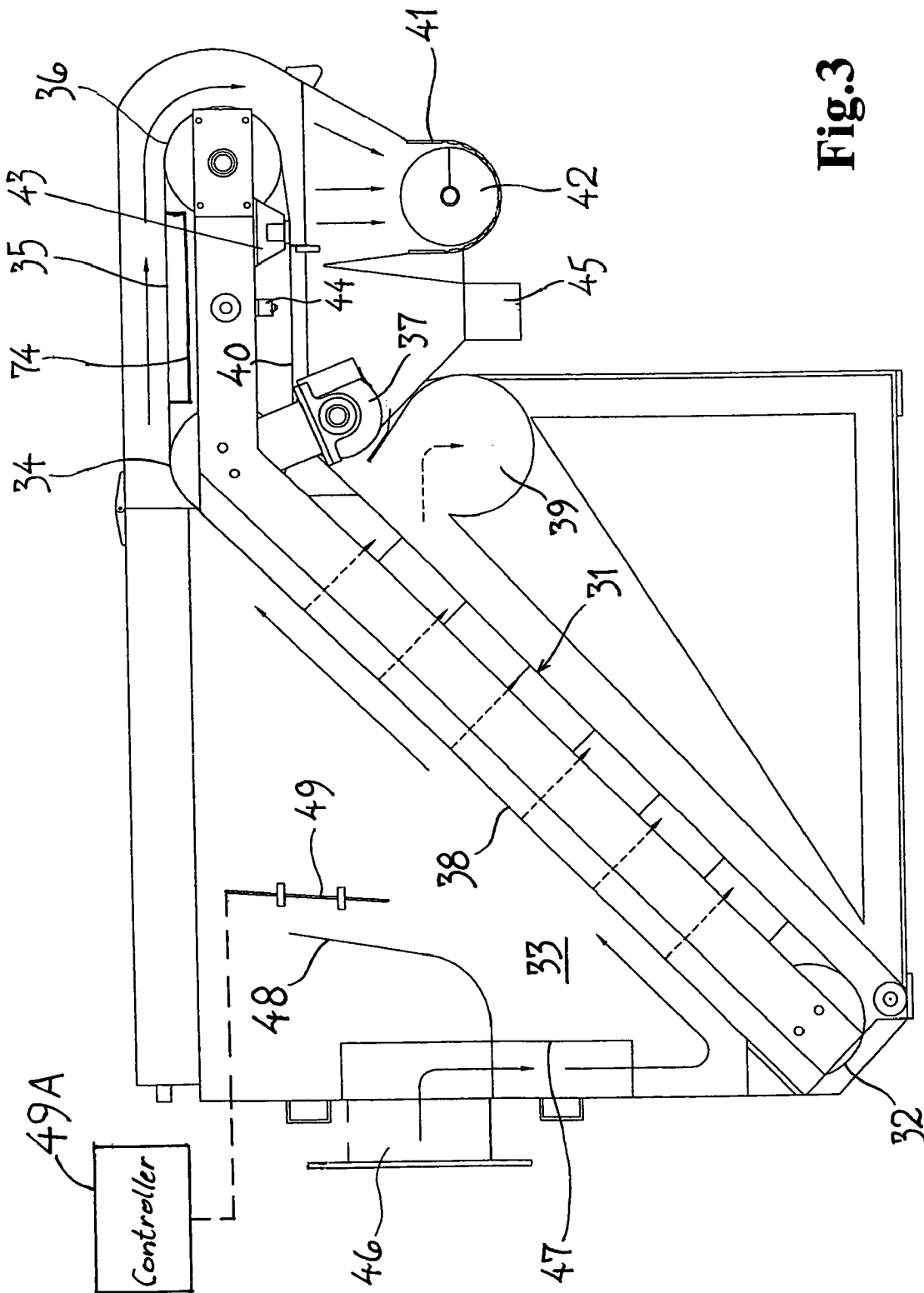


Fig. 3

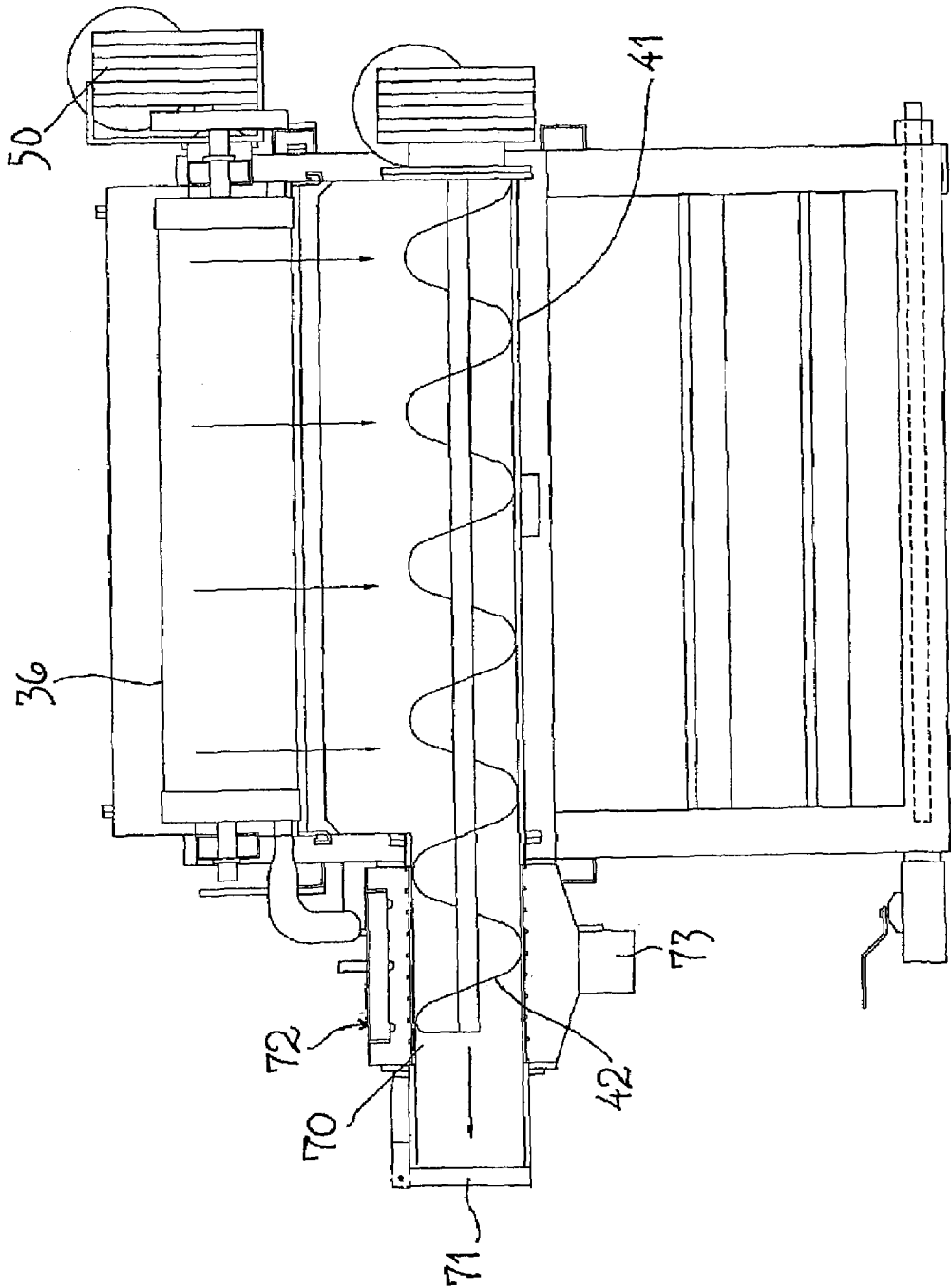


Fig. 4

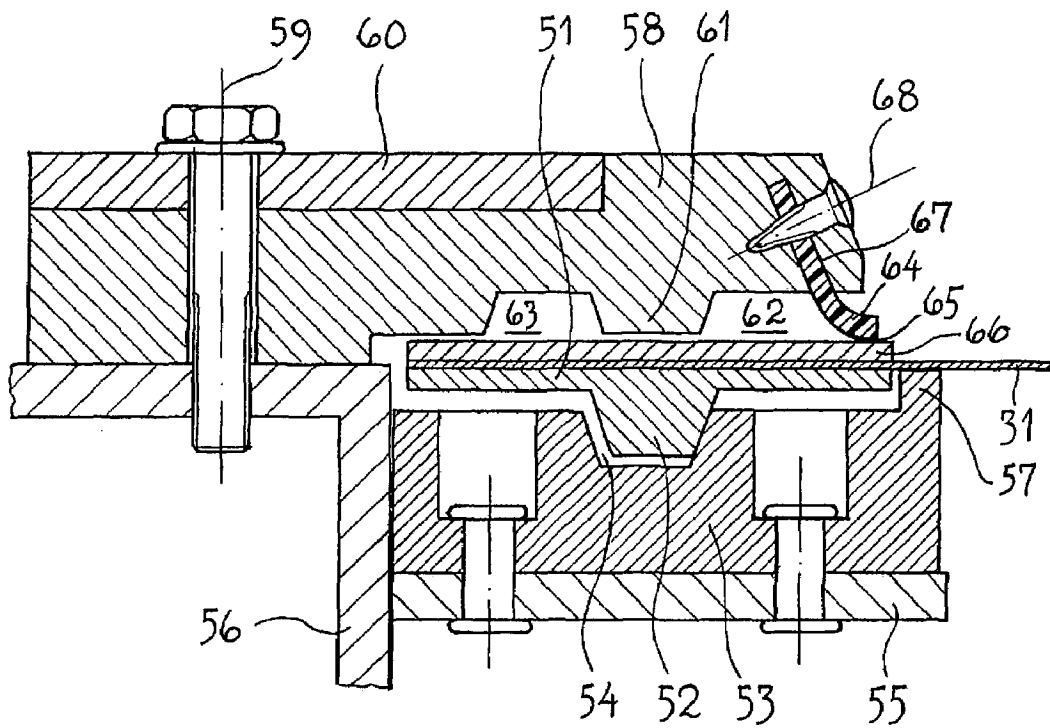


Fig.5

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**CLEANING DEVICE FOR WASTE WATER**

The invention is related to a waste water cleaning device in accordance with the introductory part of patent claim 1 and a blowoff device for blowing air or another gas towards a mesh shaped cleaning belt arranged within such a cleaning device, thus removing contamination from the cleaning belt.

**BACKGROUND**

Cleaning devices having endless filtering belts are subjected to deposit of certain types of filtering residue resulting in clogging of the band or belt, such as filtering residues in municipal waste water and starch residue in waste water from potato refinement plants.

U.S. Pat. No. 165,826 discloses a device that uses air blow from the underside of the filtering band to lift water and particles from the band and direct the water back to the band. This device is not capable of giving any satisfactory operation in cleaning plants of interest herein, i.e., cleaning of municipal waste water.

WO A87/02595 (Ericksson) describes blowing pressurized air or water from above towards a filtering belt and collecting the residue in a collecting chute. This form of residue removal has not been effective. Air blowing in this way is at best suitable for removal of dry filtrate not containing fat or similar compounds.

U.S. Pat. No. 4,921,608 solves this problem by spraying hot water vapour. However, this technical solution is both equipment and energy demanding and it is for that reason an efficient but costly implementation.

U.S. Pat. No. 178,608 describes a cleaning device having an endless filtering belt carried through a waste water container for filtering of waste water, wherein the filtering band is carried over numerous rollers in such a way that it, in a certain area runs substantially horizontally with the residue turned downwards. Within this area there is a rod shaped exhaust or blowoff device to effect an air blow towards the filtering belt. A blowoff device is arranged in parallel with the blowoff device and downstream to spray water jets towards the filtering band. This cleaning device has several weaknesses with regard to the cooperation between its separate modules. An example of the latter is causing the blowoff device, which has a particularly high energy demands to achieve satisfactory tearing-off effect. Moreover, the device has been subject to clogging because of particles moved into the blowing aperture.

**Object**

The main object of the invention is therefore to improve the cleaning device disclosed in U.S. Pat. No. 178608. Another object of the invention is to increase the cleaning throughput and cleaning efficiency. In that connection it is important to effect proper water removal from the filter mesh, irrespective of the quantity of waste water supplied and of the solid content of the waste water.

With regard to the filter mesh, it is important to guide the mesh in such a way that the speed can be varied without effecting any substantial wear. In other words, an object of the invention is to improve guidance and treatment of the filter mesh to ensure a long service life at varying speeds.

A particular object of the invention is to provide a blowoff device having improved efficiency with regard to the disengagement efficiency in order to remove deposits having a low solid content from the filter mesh. Another object is to obtain a high blowing air speed to decrease the energy demand and obtain effective cleaning in a larger mesh area,

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in order to prevent fat deposits, among others. Another object is to provide a blowing device which is less subject to clogging.

**Invention**

The essential features of the invention establish a low water content within the deposits guided from the filter mesh to the screw conveyor. The screw conveyor will then be able to perform an effective pressing of the solids to further decrease the water portion, which again decreases the handling problems with the residue waste.

The construction of the blowing device also contributes to increase the cleaning efficiency. As far as we are concerned, the increased cleaning efficiency is caused by the construction providing an advantageous combination of increased air speed and increased air jet width, which is effective to the cleaning belt.

First, the novel construction provides an increased air blow speed when it leaves the blowing device and passes through the filter mesh. This is particularly the case when the air blow pressure is at least 0.8 bar. The result is an increased mechanical effect because of the increased speed within the cleaning area and an effective operation across a larger width of the filter mesh. This provides increased cleaning effect and/or allows for reduction of air quantity or air pressure, thus resulting in a reduced energy demand.

Another advantage of the invention is that the air slot is substantially wider in the section contacting the cleaning belt, i.e., the filter mesh. When the filter mesh is moving there is a risk for particle movement into the air slot. By having a larger air slot, in accordance with the invention and producing a wider air jet at a higher speed, the problem with solid movement and sliding and deposit of contaminants from the cleaning belt will decrease, which again results in a more reliable operation and reduced maintenance.

**EXAMPLE**

The invention is illustrated in the drawings, wherein FIG. 1 illustrates a schematic side view of a blowing device in accordance with the invention for use with a cleaning device illustrated in FIGS. 3 and 4,

FIG. 2 illustrates a cross section through the center part of the blowing device of FIG. 1,

FIG. 3 illustrates a side view of a cleaning device in accordance with the invention, wherein the blowing device of FIG. 2 is attached,

FIG. 4 illustrates a partially sectioned end view of the eject end of the cleaning device of FIG. 3 and,

FIG. 5 illustrates a cross section through the guiding or clamping rails of the filter mesh edge.

FIG. 1 illustrates a rod shaped blowing device 11 provided with brackets 12 and 13 at each end thereof to facilitate mounting within a plant (not shown, e.g., beneath and in contact with a cleaning belt 14 for waste water (FIG. 2). The cleaning belt 14 may be comprised of a filter mesh extending through an entry zone (not illustrated), e.g., for waste water, and further extending, having its rear side facing upwards, past the underlying blowing device 11, wherein deposits possibly containing fat are to be removed.

The blowing device 11 comprises a supply pipe 15, such as a rectangular pipe provided with a series of holes at its top side, connected to a pressurised air source (not illustrated). At one end of said pipe there is attached a pipe shaped angle piece 16. A nozzle rod 17 is arranged over the supply pipe 15, for example a polymer pipe, as illustrated in further

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detail in cross section in FIG. 2 and which constitutes a substantial part of the present invention.

FIG. 2 illustrates how the nozzle rod 17 comprises an elongate inlet chamber 18 which receives compressed air from the adjacent elongate supply pipe 15. The nozzle rod 17 can, for example, be screwed into the supply pipe 15 with a series of holes 19 in the resting surface towards the inlet chamber. The inlet chamber 18 can exhibit a width of 8 mm, and a bottom 18A converging with an opening angle of 120 degrees and forming an inlet manifold to a series of holes 20 extending through the nozzle rod, e.g., having a diameter of 2.5 mm, a length of 1–10 mm and a center distance of 4 mm.

The series of holes 20 open into an elongate outlet slit 21 having a width at the outlet of about 1:5 of the hole diameter and having a depth of about 5 times the narrowest width. The outlet slit 21 expands like a trumpet towards the outlet, i.e., having a diverging course, an intermediate section 21B having walls forming an opening angle of about 20 degrees, to an outlet section 21C having a rounded transition to the outer edge 21D. This construction will establish a modified flow regime at the decompression and the transition from the outlet slit 21 to the cleaning belt.

In accordance with the invention, firstly the air speed at the slit outlet 21C will increase, which again increases the volume of the air flowing through the cleaning belt. Accordingly, a stronger air flow is established, both with regard to intensity and size, as stated above.

In order to stabilize the nozzle rod 17 mechanically in relation to the supply pipe 15, the rod is provided with a groove 22, in the region at the inlet slit 18, forming elongate side flanges 23 and 24 being engaged with the supply pipe.

Numerous parameters of this construction can be modified in relation to the embodiment illustrated, such as the distance between the nozzle rod and cleaning belt, the length of the parallel section of the outlet slit, which may be zero, the opening angle of the outlet slit and the curved outlet section of the same.

The ratio between the compressing section 20 and the outlet section 21C is less than about 1:5, preferably less than about 1:10. The width of the outlet section is about 1:5 of the length of the diverging section 21B, 21C.

FIGS. 3 and 4 show a cleaning device in accordance with the invention having an endless filtering belt 31 guided over a lower turn roller 32, inclined upwards through a waste water container 33 to a first upper turn roller 34 and over a horizontal section 35 to a second upper turn roller 36 guiding the belt back below the horizontal section 35 to an underlying turn roller 37 below the first upper turn roller 34. From this position the filtering belt 31 extends downwards to the lower turn roller at the bottom of the waste water container 33. The inclined path 38 of the filtering belt 31 up through the waste water container is sealingly connected to check rails, illustrated in further detail in FIG. 5, forming the active filter area. The water flows through the filter and out into the waste water container and up to a laterally arranged end or outlet piece 39 at the upper edge of the waste water container. This is located below the first upper turn roller 34.

In the region between the second upper turn roller 36 and the underlying turn roller 37, the filtering belt 31 forms a web 40 with a reversed surface, to allow collected residue to fall down into a collecting gutter 14. Loose particles and other loose residue will, after having passed the second upper turn roller 36, fall freely and become collected by a transverse screw conveyor 42 transporting the filtrate residue transversely out to a suitable collecting means.

In order to remove sticking filtrate residue, a transverse blowing device 43 is arranged above the belt region and

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above the screw conveyor 42 and is connected to an air compressor 9 the latter not shown). This can be an elongate pipe provided with suitable outlet nozzles or outlet slits directed downwards to the upwards facing side of the filtering belt 31, i.e., the reverse in relation to the residue.

It has been shown that such a blowing device 43 can remove different types of deposits or residue which otherwise would have remained attached to the filtering belt and thus formed a filter cake which finally would have clogged the filtering belt. Some of this advantageous effect is assumed to be caused by the air heating which occurs at the blowout through substantially narrow nozzles or slits. This heating can occur without any substantial energy supply because of the high specific heat of the air, since the air blow provides a highly effective heat transfer to deposits on the filter belt.

An ejection pipe 44 for ejecting water jets to the filtering belt is located downstream of the blowing device 43. These water jets are capable of removing residue that is disengaged by the air flow but still attached to the filtering belt 31. For collecting of the water supplied and the last residue, a further transverse collecting gutter 45 with a transversely directed outlet pipe is arranged as an extension of the collecting gutter 41. The water from this trough is directed back to the waste water container.

A sensor 49 is located within the waste water container 33, such as an air pipe monitoring the counterpressure towards injected air, thus determining when the waste water level exceeds a certain level. Alternatively, the sensor can be a float or level indicator based upon sound waves. The sensor 49 is connected to a control system 49A for a driving motor 50 arranged at one end of the rear turn roller 36 for driving the filtering belt. This control system 49A secures a sufficiently low speed of the filtering belt that the level within the waste water container 33 is kept below a certain height. Accordingly, there is established a sufficient length of the upwards rising part 38 of the filtering belt 31 so that the water content of deposited mass upon the filtering belt is kept below 95%, preferably below 90%.

A suction box can be arranged below the upper section of the filtering belt 31 and connected to an extract fan (not illustrated) to further extract water from deposits upon the filtering belt.

FIG. 5 illustrates detail for the guidance of the filtering belt 31. For example, the filter belt can employ a mesh of polyester web having threads of 0,3 mm and holes of 0,3 mm. This will provide a web thickness of 0,6 mm. A transmission belt 51 exhibiting a guiding fin 52 at the underside can be provided as a driving mechanism for the filtering belt. The transmission belt 51 can be constructed of, e.g., polyurethane, optionally having reinforcing threads. Accordingly, it runs over the turn rollers and is conveyed between same on a guide rail 53 with a slot 54 for the guiding fin 52. The guide rail 53 can be constructed of polyethylene and can be fastened to a steel rail 55 connected to the box girder 56 of the cleaning device. The guide rail 53 is at its inner edge provided with an upwards extending flange 57 as a transverse guide for the transmission belt 51.

In order to keep the filtering belt 31 in contact with the transmission belt 51, a clamping rail 58 of polyethylene is arranged over the edge, connected to the box girder 56 with a screw 59 and a pressure plate 60. The guide rail is provided with a downcast fin 61 forming an external and an internal drain groove 62,63. In order to establish pressure against the filtering belt 31 a lip 64 is constructed of a soft material, for example Teflon or rubber, at the edge and having a land surface 65 faced towards the filtering belt 31. The filtering

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belt 31 is covered by a band 66 in the edge area to protect the filtering belt 31 against wear. The lip 64 is inserted into a slit 67 forming an angle of about 70 degrees with the band plane. A series of screws 68 are fastened at an angle with the slit 67 to anchor the lip 64 within the slit 67.

This construction of the filtering belt 31 guidance provides several advantages, such as decreased wear and a proper sealing effect. The filtering belt can be arranged tightly to the turn rollers and in this way be guided securely, also at high speed.

This construction enables a more effective compression within the screw conveyor 42 than was achievable by former constructions. By providing the outlet pipe 70 with a spring loaded lid 71 it is possible to press the solids to effect a dewatering of the same within the outlet pipe. The outlet pipe 71 is perforated at the end of the screw conveyor 42 and is provided with a collecting jacket 72 with a drain pipe 73.

What is claimed is:

- 1. A cleaning device for cleaning waste water, comprising:
  - a waste water container for receiving a flowing supply of waste water;
  - an endless filtering belt guided through the container for filtering the waste water, the belt passing over a series of turn rollers that define an upward rising section and a horizontal section wherein residue trapped on the belt faces downward;
  - control means for controlling the speed of movement of the filtering belt relative to the supply of waste water to maintain the waste water surface below a selected level and thus obtain a strong dewatering within the upward rising section of the filtering belt;

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- a blowoff device mounted over the horizontal section of the filtering belt with a front end side facing toward the filtering belt for blowing air towards the filtering belt, the blowoff device having an elongated slit having an expanding section expanding from a constriction, and a curved transition region leading from the expanding section to the front end side of the blowoff device;
  - a nozzle pipe for spraying water jets toward the filtering belt, the nozzle pipe being mounted in parallel with the blowoff device and downstream thereto; and
  - a screw conveyor arranged below the blowoff device for removing the residue dislodged from the filtering belt.
- 2. The cleaning device in accordance with claim 1, wherein the front end side is in contact with the filtering belt.
  - 3. The cleaning device in accordance with claim 1, wherein the expanding section of the slit is rectilinear.
  - 4. The cleaning device in accordance with claim 3, wherein the expanding section has an opening angle of about 20 degrees.
  - 5. The cleaning device in accordance with claim 1, wherein the width of the constriction is about 1/5 of the length of the slit.
  - 6. The cleaning device in accordance with claim 1, further comprising a transmission belt in contact with a portion of the filtering belt for moving the filtering belt in unison with the transmission belt; and
    - a clamping rail stationarily located adjacent the rising section of the filtering belt for pressing the filtering belt against the transmission belt.

\* \* \* \* \*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY**

This case has been assigned to District Judge James V. Selna and the assigned discovery Magistrate Judge is Arthur Nakazato.

The case number on all documents filed with the Court should read as follows:

**SACV11- 1239 JVS (ANx)**

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

=====

**NOTICE TO COUNSEL**

*A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).*

Subsequent documents must be filed at the following location:

**Western Division**  
312 N. Spring St., Rm. G-8  
Los Angeles, CA 90012

**Southern Division**  
411 West Fourth St., Rm. 1-053  
Santa Ana, CA 92701-4516

**Eastern Division**  
3470 Twelfth St., Rm. 134  
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

Joseph Hamilton, Bar No. 211544  
JHamilton@perkinscoie.com  
PERKINS COIE LLP  
1888 Century Park East, Suite 1700  
Los Angeles, CA 90067-1721  
Tel: 310.788.9900/Fax: 310.788.3399

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

SALSNES FILTER AS, a Norwegian corporation,

CASE NUMBER

PLAINTIFF(S)

**SACV11-01239 JVS(ANX)**

v.

M2 RENEWABLES, INC., a Delaware corporation;  
and NEPSUS ENVIRONMENTAL LLC, an Arizona  
Limited Liability Company,

**SUMMONS**

DEFENDANT(S).


TO: DEFENDANT(S): \_\_\_\_\_

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached  complaint  \_\_\_\_\_ amended complaint  counterclaim  cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Joseph Hamilton, whose address is 1888 Century Park East, Suite 1700, Los Angeles, CA 90067-1721. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: August 18, 2011

By:   
Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

Joseph Hamilton, Bar No. 211544  
JHamilton@perkinscoie.com  
PERKINS COIE LLP  
1888 Century Park East, Suite 1700  
Los Angeles, CA 90067-1721  
Tel: 310.788.9900/Fax: 310.788.3399

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

SALSNES FILTER AS, a Norwegian corporation,

CASE NUMBER

PLAINTIFF(S)

SACV11-01239 JKS(AN)x

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SUMMONS

DEFENDANT(S).

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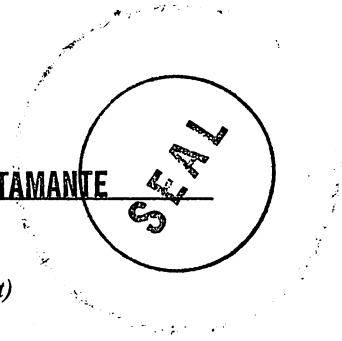
Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached  complaint  \_\_\_\_\_ amended complaint  counterclaim  cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Joseph Hamilton, whose address is 1888 Century Park East, Suite 1700, Los Angeles, CA 90067-1721. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: August 18, 2011

By: SUSANA P. BUSTAMANTE  
Deputy Clerk

(Seal of the Court)



[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

<b>I (a) PLAINTIFFS</b> (Check box if you are representing yourself <input type="checkbox"/> ) SALSNES FILTER AS, a Norwegian corporation	<b>DEFENDANTS</b> M2 RENEWABLES, INC., a Delaware corporation; and NEPSUS ENVIRONMENTAL LLC, an Arizona Limited Liability Company
<b>(b) Attorneys</b> (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)  Joseph Hamilton PERKINS COIE LLP - Tel: 310.788.9900 1888 Century Park East, Suite 1700, Los Angeles, CA 90067-1721	Attorneys (If Known)

<b>II. BASIS OF JURISDICTION</b> (Place an X in one box only.)  <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)  <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	<b>III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only</b> (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">PTF</th> <th style="text-align: center;">DEF</th> <th></th> <th style="text-align: center;">PTF</th> <th style="text-align: center;">DEF</th> </tr> </thead> <tbody> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </tbody> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
	PTF	DEF		PTF	DEF																				
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4																				
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Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

**IV. ORIGIN** (Place an X in one box only.)

1 Original Proceeding    
  2 Removed from State Court    
  3 Remanded from Appellate Court    
  4 Reinstated or Reopened    
  5 Transferred from another district (specify):    
  6 Multi-District Litigation    
  7 Appeal to District Judge from Magistrate Judge

**V. REQUESTED IN COMPLAINT:** JURY DEMAND:  Yes    No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23:  Yes    No     MONEY DEMANDED IN COMPLAINT: \$ \_\_\_\_\_

**VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

Patent Infringement, 35 U.S.C. § 271.

**VII. NATURE OF SUIT** (Place an X in one box only.)

<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <input type="checkbox"/> 820 Copyrights <input checked="" type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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SACV11-01239

**FOR OFFICE USE ONLY:** Case Number: \_\_\_\_\_

**AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.**

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed?  No  Yes  
 If yes, list case number(s): \_\_\_\_\_

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case?  No  Yes  
 If yes, list case number(s): \_\_\_\_\_

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply)  A. Arise from the same or closely related transactions, happenings, or events; or  
 B. Call for determination of the same or substantially related or similar questions of law and fact; or  
 C. For other reasons would entail substantial duplication of labor if heard by different judges; or  
 D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.  
 Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	Norway

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.  
 Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Orange	Delaware, Arizona

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.  
 Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
San Bernardino, Orange	

\* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved.

X. SIGNATURE OF ATTORNEY (OR PRO PER):  Date August 18, 2011

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))