

1 PEDRO N. IBANEZ, PRO SE
2 US NAVY (RET)
3 29915 MIRA LOMA DR. UNIT 29
4 TEMECULA CA, RIVERSIDE COUNTY 92592
5
6 951-452-0475
7 Admrpeter@yahoo.com
8

FILED
AUG 16 2024
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA
NP

9
10 US DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA
11 450 GOLDEN GATE AVE. BOX 36060, SAN FRANCISCO CA 94102
12

13 PEDRO N. IBANEZ

Case No. Number

CV24 5302
VKD

14 Plaintiff,

15 vs.

COMPLAINT AND REQUEST FOR
INJUNCTION TO CEASE AND DESIST
FOR VIOLATION OF PLAINTIFF RIGHTS
UNDER 35 USC 261.

16 ELECTRIC HYDROGEN CO.

17
18 ELECTRIC HYDROGEN
19 MANUFACTURING LLC

DEMAND FOR JURY TRIAL

20 RAFFI GARABEDIAN, CEO

21 Defendants

22 MEMO TO CLERK: FILE BY DEMAND

23 Table of Contents

- 24
25 1. Requests for Admissions for Mr. Paul Browning and Mr. David Eaglesham.
26 2. Exhibit 1-1 to 1-7 conversation of Mr. Paul Browning.
27 3. Exhibit 2-1 Image of Hydrogen plants in San Carlos CA and San Jose CA owned
28 by Defenfants.
4. Exhibit 3-1 to 3-17 USPTO patent application documents.
5. Exhibit 4-1 35 USC 261.

PLEADING TITLE - 1

- 1 6. Exhibit 5-1 Letter of Claim to City of Los Angeles Dept. of Water and Power.
2 7. Exhibit 6-1 Declarations of Atty. McCarthy and Mr. Paul Browning.

3 JURISDICTION

4 Jurisdiction and Venue are proper. Defendants have mechanical facilities, (Exhibit 2-1)
5 in San Carlos and San Jose California that closely resemble the mechanical operations
6 that are CLAIMS in Plaintiff's US Patent and Trademark Office (USPTO) on-going and
7 abandoned patent applications. The USPTO allows new Patent Applications to be
8 connected or File Date Retroactive to the same inventor's past Patent Applications
9 (CIP- CONTINUATION IN PART):

10 Exhibits 3-1 to 3-17. USPTO Patent Applications 16/598965, 16/859711, 17/322938,
11 18/518994.

12 Plaintiff new Patent Application 18/761178 incorporate CLAIMS in all the above past
13 Patent Applications. Exhibit 3-1.

14 This new patent application 18/761178 does NOT require solar, windmills, nuclear,
15 hydroelectric or petroleum for its INPUT POWER.

16 Defendant Raffi Garabedian is co-founder and CEO of Electric Hydrogen, an out of
17 State Corporation of State of Delaware, listed and licensed with California Secretary of
18 State and allowed to do business in California. Exhibit 6. Defendant Raffi is therefore
19 directly responsible for business operations and decisions of Defendants Electric
20 Hydrogen Co. and Electric Hydrogen Manufacturing LLC.

21 STATEMENT OF FACTS

22 Plaintiff respectfully request this Honorable Court for Judicial Notice of voluntary
23 Dismissed case US federal Central District 5-21-cv-00067, Eastern Division Riverside.

24 Plaintiff's series of Patent Applications started with USPTO Patent Application
25 16/598965, file date October 10, 2019. Exhibit 3-4. This Patent Application CLAIM the
26 use of Electrolysis and steam boilers to produce residential and commercial electricity.

27 Electrolysis is the process of breaking water into its basic elements Hydrogen and
28 Oxygen.

Prior to October 10, 2019, Electrolysis was not accepted or popular among
chemical/electrical/hydrogen science as proven by exhibit 1-1 to 1-7. See also
Requests for Admissions for Mr. Paul Browning and Mr. David Eaglesham.

1 In this exhibit the CEO of Mitsubishi Power America Paul Browning is in a conversation
2 (dated on or about September 20, 2020) with journalist and British hydrogen expert. The
3 hydrogen expert stated and ask "production of hydrogen has been known as very
expensive, what has changed?"

4 The hydrogen expert refers to production of hydrogen using Methane or natural gas
5 which is not economical as it uses more electricity than it produces. And leaves carbon
6 residue which makes this process not environmentally friendly.

7 In essence, Mr. Paul Browning answers by stating that his company Mitsubishi Power
8 Americas has found a way to produce Hydrogen cost-effectively using Electrolysis with
9 Solar and windmills. Mr. Browning had described the Claims in Plaintiff series of Patent
Applications, which originally file-dated October 10, 2019, eleven months before the
above News Conversation (exhibit 1-9).

10 Plaintiff respectfully request this Honorable Court for Judicial Notice of voluntary
11 Dismissed case US federal Central District 5-21-cv-00067. Mr. Browning presented a
12 testimony to the effect that City of Los Angeles is also copying Claims in Plaintiff series
of USPTO applications. See Exhibit 6-3 Declaration of Atty William MCCarthy.

13
14 Plaintiff had sent a Letter of Claim to City of Los Angeles CA, Dept. of Water and Power
15 requesting that this city agency Cease and Desist from engaging in activities that copy
16 Plaintiff US Patent Applications, explained above. Plaintiff will also send a Letter of
Admissions to Los Angeles Department of Water and Power CEO Janisse Quinones.

17 In Plaintiff Patent Application 16/598965, the main input power for electrolysis is a
18 portable 5000watt gasoline generator, but suggested Solar and Windmills as alternative
19 source of power for Electrolysis. Nevertheless Electrolysis and Steam Boilers are
20 included in Plaintiff's 16/598965 Application. Refer to exhibit 3-10 to 3-12, Fig 1
drawings. Plaintiff uses Cup Rotators (Star Gear, in Plaintiff's new Patent Application).
The Cup Rotators or Star Gear is directly connected to a large Dynamo.

21 Suffice to describe that when a Large Dynamo is rotated it produces large amount of
22 electricity, depending on size of Dynamo. Present day power plants, other than
23 hydroelectric, all use steam boilers.

24 The CLAIMS of Plaintiff that Defendants have copied is Claim One, Claim Two and
25 Claim Three in new Patent Application 18/761178. Plaintiff will estimate Claim
One/two/three as 90% of Defendants operations in California.

26 Plaintiff New Patent Application 18/761178 has evolved to produce Commercial Power
27 and Commercial Water from oceanwater using Electrolysis, Steam Boilers, Desalination
28 and Distillation. The source of input power to electrolysis is, however, NO LONGER a

1 portable 5000wattt generator. The new application DOES NOT USE SOLAR,
2 WINDMILLS, NUCLEAR, nor Petroleum.

3 The new power input is HUNDRED PLUS BIKERS TO ROTATE 1000megawatt
4 Dynamo, USPTO Application #18/518994.

5
6 CAUSE OF ACTION

7 35 USC 261 (exhibit 4-1) protects an inventor's right to assign his Patent
8 Application, even before patent is granted.

9 The actions and events perpetrated by defendants, expensive and widely publicized,
10 such as building 100megawatt electrolyzer plants in San Carlos and San Jose CA will
11 make it difficult for Plaintiff to convince any investor that he originated and patented the
12 concept using ELECTROLYSIS AND STEAM BOILERS together to make Hydrogen
production cost-effective.

13 Unless Plaintiff can produce a court order to CEASE AND DESIST, any investor will
14 ignore and laugh.

15 EBay Inc. v MercExchange LLC, 547 US 388

16
17 REQUEST FOR RELIEF

18 Option One. Order defendants to CEASE AND DESIST ALL Hydrogen power plant
19 operations in California, temporarily for THREE years. Plaintiff may request for longer
20 injunction to Cease and Desist, depending on progress of USPTO application process.

21 Option Two. Order defendants to obtain ASSIGNMENT OF PATENT APPLICATION
22 from Plaintiff, compensating Plaintiff by paying TWO MILLION DOLLARS
23 (\$2,000,000.00) and three percent (3%) of NET QUARTERLY SALES.


24 Tender to Plaintiff the right to audit and copy Defendants financials upon request each
25 quarter, including all sales receipts and contracts entered into by defendants, organized
26 according to Table of Contents, within15 days.

27 Dated July 02, 2024 signed at Temecula CA

28 PLEADING TITLE - 4

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PEDRO N. IBANEZ, PRO SE



Attorney Name



7-12-24

PLEADING TITLE - 5

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PEDRO N. IBANEZ, PRO SE
US NAVY (RET)
29915 MIRA LOMA DR. UNIT 29
TEMECULA CA, RIVERSIDE COUNTY 92592
951-452-0475
Admrpeter@yahoo.com

US DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA
450 GOLDEN GATE AVENUE, BOX 36060, SAN FRANCISCO CA 94102

PEDRO N. IBANEZ
Plaintiff,
vs.
ELECTRIC HYDROGEN CO.
ELECTRIC HYDROGEN
MANUFACTURING LLC
RAFFI GARABEDIAN, CEO
Defendants

Case No.: Number

COMPLAINT AND REQUEST FOR
INJUNCTION TO CEASE AND DESIST
FOR VIOLATION OF PLAINTIFF RIGHTS
UNDER 35 USC 261.

DEMAND FOR JURY TRIAL

MEMO TO CLERK: FILE BY DEMAND

REQUEST FOR ADMISSIONS

This Request for Admissions is directed to Mr. David Eaglesham, co-founder of Electric Hydrogen Co.

PLEADING TITLE - I

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1. See Exhibit 2-1. Mr. Eaglesham do you confirm that Electric Hydrogen Co. and Electric Hydrogen Manufacturing LLC, operate or develop Hydrogen power plants in San Carlos CA and San Jose CA?

YES _____ NO _____

2. See Exhibit 2-1. Mr. Eaglesham do you confirm that these two power plants in San Carlos CA and San Jose CA produce hydrogen using the process known as Electrolysis?

Electrolysis? YES _____ NO _____

3. See exhibit 2-1. Mr. Eaglesham prior to October 10, 2019, do you agree that production of hydrogen is "very expensive" and not cost-effective?

YES _____ NO _____

4. Mr. Eaglesham would you agree that prior to October 10, 2019, when inventor Mr. Ibanez (also plaintiff in this lawsuit) filed a patent application with USPTO, Electrolysis was NOT WIDELY ACCEPTED OR POPULAR in the power industry and in the production of hydrogen gas? AGREE___ DISAGREE _____

Note: Mr. Eaglesham, if you disagree, please see Subpoena that requires you to provide documents that prove Electrolysis IS ACCEPTED AND WIDELY POPULAR, in the power industry.

Signed July 09, 2024 at Temecula CA



PEDRO N. IBANEZ, PRO SE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PEDRO N. IBANEZ, PRO SE
US NAVY (RET)
29915 MIRA LOMA DR. UNIT 29
TEMECULA CA, RIVERSIDE COUNTY 92592
951-452-0475
Admrpeter@yahoo.com

US DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA
450 GOLDEN GATE AVENUE, BOX 36060, SAN FRANCISCO CA 94102

PEDRO N. IBANEZ
Plaintiff,
vs.
ELECTRIC HYDROGEN CO.
ELECTRIC HYDROGEN
MANUFACTURING LLC
RAFFI GARABEDIAN, CEO
Defendants

Case No.: Number

COMPLAINT AND REQUEST FOR
INJUNCTION TO CEASE AND DESIST
FOR VIOLATION OF PLAINTIFF RIGHTS
UNDER 35 USC 261.

DEMAND FOR JURY TRIAL

MEMO TO CLERK: FILE BY DEMAND

REQUEST FOR ADMISSIONS

This Request for Admissions is directed to Mr. Paul Browning, Chairman of the Board, Mitsubishi Power. Mr. Browning must affix his signature duly notarized.

1. See Exhibit 1-1 to 1-7, Images of personal interview between Mr. Browning and TTNEWS reporter/announcer, and its transcript.

PLEADING TITLE - I

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Mr. Browning, did you state in general terms that company Mitsubishi Power Americas (at time of interview) "is investing US\$ 3billion to produce and store hydrogen gas to use in electric Power Plants operated by the City of Los Angeles Dept. of Water and Power?

YES _____ NO _____

2. See Exhibit 1-1 to 1-7. Mr. Browning, in the same interview, did you state in general terms that Mitsubishi Power Americas, or its affiliates, will produce and store large amounts of hydrogen gas using a process known as Electrolysis, and use solar and windmills resources to power this

Electrolysis? YES _____ NO _____

3. See exhibit 1-1 to 1-7. Mr. Browning in your same interview, both British male and announcer Alex stated prior to (on or about) September 20, 2020, production of hydrogen is "very expensive" and not cost-effective. Mr. Browning, would you agree that prior to October 10, 2019, when inventor Mr. Ibanez (also plaintiff in this lawsuit) filed a patent application with USPTO, Electrolysis was NOT WIDELY ACCEPTED OR POPULAR in the power industry and in the production of hydrogen gas? AGREE___ DISAGREE _____

Note: Mr. Browning if you disagree, please see Subpoena that requires you to provide documents that prove Electrolysis IS ACCEPTED AND WIDELY POPULAR, in the power industry.

Signed July 09, 2024 at Temecula CA



PEDRO M. IBANEZ, PRO SE

EXH 1-1 TO 1-3

1 TO ALL PARTIES, AND TO THEIR ATTORNEYS OF RECORD HEREIN:
 2 PLEASE TAKE NOTICE that defendants Mitsubishi Power Americas, Inc. and
 3 Paul Browning (“Mr. Browning”) hereby lodge the following materials in support of
 4 their motion pursuant to Fed. R. Civ. P. 12(b)(2), 12(b)(3), and 12(b)(6) to dismiss the
 5 Complaint [Dkt. 2] filed by plaintiff Pedro N. Ibanez on February 2, 2021:

6 (1) Exhibit 1 hereto, a CD-ROM of the Bloomberg interview of
 7 Mr. Browning that is embedded in [https://www.ttnews.com/articles/3-](https://www.ttnews.com/articles/3-billion-planned-next-generation-hydrogen-power-plants)
 8 billion-planned-next-generation-hydrogen-power-plants, the article
 9 attached as Exhibits 1-3 of the Complaint [Dkt. 2 at 7-9] and discussed in
 10 paragraphs III.B and III.C of the Complaint.

11 Dated: March 1, 2021

PILLSBURY WINTHROP SHAW
PITTMAN LLP

12
 13
 14 By: Jeffrey D. Wexler
 15 Callie A. Bjurstrom
 16 Evan Finkel
 17 Jeffrey D. Wexler
 18 Michael R. Kreiner
 19 Attorneys for Defendants Mitsubishi
 20 Power Americas, Inc. and Paul
 21 Browning
 22
 23
 24
 25
 26
 27
 28

Transcript – Why Mitsubishi Is Planning Hydrogen-Ready Power Plants

Alex (female)	Hydrogen has been around for a long time. It's usually quite expensive. Why are you doing this now? What changed?
Interviewee	Good morning, Alex. You know, what's changed is that we have a lot more renewables on the grid now than we did, say, 10 or 15 years ago, when people started talking about hydrogen. And with a lot more renewable power on the grid, what that's creating is a need for storage. We need to be able to store renewable power when it's in excess, so that we can use it when we're short. What just happened two weekends ago in California is really a great example of why we need storage on power grids that have installed a lot of renewable power.
British male	The hydrogen's still expensive. The infrastructure is not there. What needs to happen to make hydrogen fulfill the opportunity that many people feel that it now has? Europe's pushing ahead pretty strongly; where's the United States?
Interviewee	It's a great question. You know, the difficult challenge with hydrogen is solving the problem of how do we get started, and we have a project in Utah that we previously announced, where we had the good fortune of having a hydrogen power plant right on top of a salt dome, where we could produce and store hydrogen. But these three projects that we announced today are in unregulated markets. These are independent power producers in the eastern United States, where there's not a ready source of hydrogen nearby, and so what we're announcing is we're making these power plants hydrogen-ready. So on day one, they're going to use natural gas as their fuel, but they are going to be ready for hydrogen when the grid needs storage. And when we build out the underground infrastructure, we're going to need to deliver hydrogen to these power plants. So it's sort of solving the chicken and egg problem, you know? You're not going to invest in the underground infrastructure until there are power plants who need hydrogen, and you're not going to build power plants that need hydrogen until you've got that underground infrastructure. So what we're doing is making these power plants hydrogen ready. They're going to be able to use hydrogen on site, stored on site, a smaller amount of hydrogen, which is going to dramatically improve the flexibility of these power plants and create value that way but make them ready for the future when the power grids in Ohio, New York and Virginia need a massive amount of stored renewable power.
Alex	When does that happen? Like when do you get to 100% hydrogen? Can you give me some timings?

EXHIBIT 1-2

Interviewee	You know, it's going to change depending on what power grid you're in. So, for example, in California: California needs stored power now, which is why our project in Utah right at commercial operation is going to be capable of using 30% hydrogen. But in the state of New York, it will probably come pretty soon, because they're very aggressive in putting renewables on their grid. Virginia is going to install a lot of offshore wind in the coming years, and so that's going to create their need for stored renewables. And then Ohio might come after Virginia. So, you know, the answer your question is "it depends," but, you know, in general, this is all going to happen over the next decade.
British male	Where does the lead come from, in terms of the sectors that are going to be utilizing hydrogen? Transportation is obviously something that is often talked about, but it hasn't really taken off yet. But if you take a look at what's happening in the trucking market, that certainly looks like an opportunity for hydrogen's usage to a far greater degree. Are you going to piggyback off them, or are they going to piggyback off you?
Interviewee	That's a great question. The answer is they're going to piggyback off us. It's actually easier to do this first in power, and that's why we're moving fast with these multi-billion dollar projects, because we can make it make sense right now in power. But as we connect this underground infrastructure, we're going to use rights of way along highways to connect these with pipelines that are going to move renewable hydrogen underground. And so, as we build those along highways, then we're going to be able to tap into that for a massive amount of very affordable green hydrogen that'll be available for transportation and also for industrial uses. There's a lot of things that we're not going to be able to electrify as we move forward into the future, and so hydrogen is going to play that role of decarbonizing things that are hard to electrify.
Alex	So on that point, how are you going to be selling the power? Is it going to be sort of short-term contracts, in which case you have to really compete in the market, or do you think you're going to have success, and with what kind of pricing, for longer term contracts?
Interviewee	It, you know, and again it depends. In our project in Utah, were going to be signing a long term gas supply agreement with the user of the hydrogen fuel, and and then—they're a utility; it's Intermountain Power—they have, you know, they're going to sell it through their utility network. These projects we announced today that are in the eastern United States, these are in competitive markets where they they compete in a capacity auction like in PJM or New York ISO, and then they get a capacity payment, and then on top of that they get energy

EXH 1-3

	payments,, and that combination of capacity and energy payment is where they get their revenues.
--	--

EXH 1-4

EXHIBIT B1-5

Other electric generators also are exploring integrating green hydrogen into their power production in an effort to slash emissions as more states set renewable-energy mandates. Utility NextEra Energy Inc. in July announced it will run one of its Florida power plants, in part, on hydrogen, using solar power to strip the gas from water.

There is clearly an opportunity five to 10 years from now to displace the last 10% of the carbon emissions out of the electric sector by manufacturing hydrogen with renewables," Jim Robo, NextEra's CEO, said during an earnings call in July.

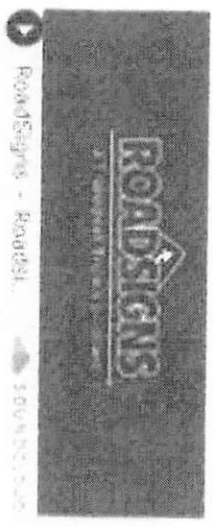
Mitsubishi earlier this year announced its first hydrogen storage and power project for \$1.9 billion in Utah to serve the Los Angeles Department of Water and Power, and has

created a standard power plant design that is being used in the new U.S. projects. While the L.A. project is being built for a municipal utility, the others will serve competitive power markets in the Midwest and East Coast, including PJM

Interconnection, which operates the country's largest power market, and the New York Independent System Operator.

The first will be Danskammer's 600-megawatt plant in Newburgh, N.Y. Danskammer CEO William Reid said in a statement the project would help the state meet its climate goals. The Ballico plant in Virginia will generate 1,600 megawatts while EmbertClear's Ohio facility will have a capacity of 1,084 megawatts. EmbertClear is in the early stages of

the-ews.com



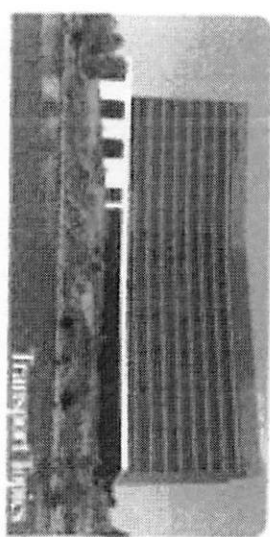
Natural gas and propane join electric power as alternatives to diesel. Host Seth Clevenger talks with Chad Lindholm of Clean Energy and Stuart Weidie of Alliance Autogas. Hear a snippet, above, and get the full program by going to RoadSigns.TTNews.com



TWEETS by @TransportTopics

Transport Topics

MITSUBISHI identified five recalls that involved 800,000-1,000,000 trucks that were included in the program. By www.roadsigns.com/articles/07/01/14



MITSUBISHI Freight Daimler \$19 Million Order Open. www.roadsigns.com/articles/07/01/14

Transport Topics

U.S. states have completed installation of an automated crash prevention system that covers more than 500 miles of freight and passenger routes. www.roadsigns.com/articles/07/01/14





AA

WUWS.COM

Rep. Elin ... Submitter C ... The user ... www.wuws.com ... Mass. ...

33 Billion Pl...

www.wuws.com



Mitsubishi Power Americas CEO Paul Browning said.

Green hydrogen — produced by stripping the gas from water using electrolyzers powered by wind and solar — is seen as key to eliminating carbon emissions from the industrial sector that now relies on natural gas as both a fuel source and a feedstock.

Subscribe

Get a Subscription

Hot Topics

Daimler Trucks North America

railroads PTC stimulus

Coronavirus

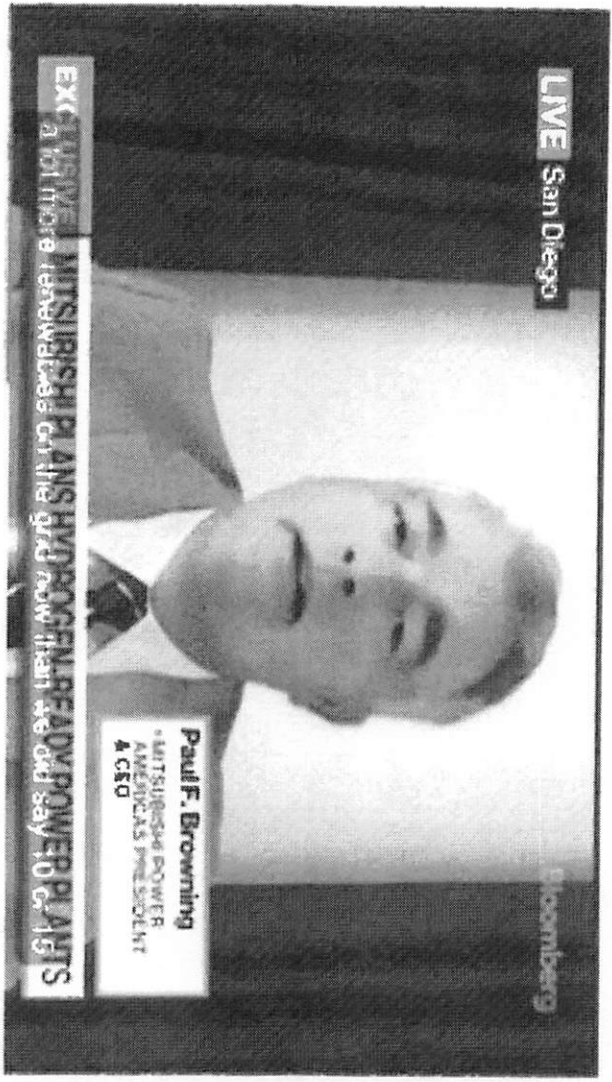
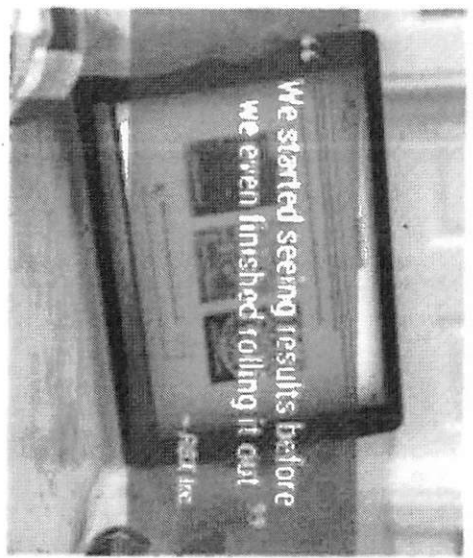


EXHIBIT 2-1-6

Other electric generators also are exploring integrating green hydrogen into their power production in an effort to slash emissions as more states set renewable-energy mandates. Utility NextEra Energy Inc. in July announced it will run one of its Florida power plants, in part, on hydrogen, using solar power to strip the gas from water.

There is clearly an opportunity five to 10 years from now to displace the last 10% of the carbon emissions out of the electric sector by manufacturing hydrogen with renewables," Jim Robo, NextEra's CEO.



Twitter's Transport Topics

Transport Topics

MTRCA-eligible jurisdiction that received 2007-2009 ...



AA

tnews.com



Rep. Elin

Supreme Co

Mid Media

Ann. (2024)

Mass Mand

Component A

\$3 Billion Pt...

www.uscour

Mitsubishi Power Americas CEO Paul Browning said.

Green hydrogen — produced by stripping the gas from water using electrolyzers powered by wind and solar — is seen as key to eliminating carbon emissions from the industrial sector that now relies on natural gas as both a fuel source and a feedstock.

Subscribe

Gift a Subscription

Hot Topics

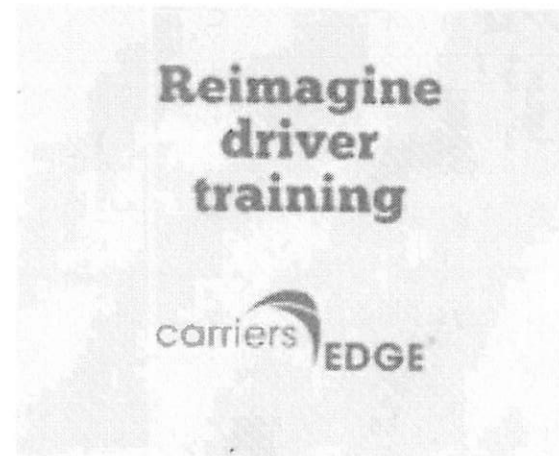
Daimler Trucks North America

railroads

PTC

stimulus

Coronavirus



Tweets

Transport Topics



Transport Topics

NHTSA identified two recalls that involved about 600,000 vehicles that were involved in the recall. My...

EXHIBIT 1-7

Other electric generators also are exploring integrating green hydrogen into their power production in an effort to slash emissions as more states set renewable-energy mandates. Utility NextEra Energy Inc. in July announced it will run one of its Florida power plants, in part, on hydrogen, using solar power to strip the gas from water.

"There is clearly an opportunity five to 10 years from now to displace the last 10% of the carbon emissions out of the electric sector by manufacturing hydrogen with renewables," Jim Robo, NextEra's CEO.

4/26/24, 5:23 PM

About Electric Hydrogen - Solutions to achieve low-cost hydrogen

Electric Hydrogen announces a 10 MW framework supply agreement for large-scale electrolyzer plants with The AES Corporation – Read More (<https://eh2.com/manufacturing-process-a-1gw-framework-supply-agreement-for-large-scale-electrolyzer-plants-with-the-aes-corporation/>)

(<https://eh2.com>)



Plant Engineering San Carlos, CA and San Jose, CA

The California Bay Area is where we engineer the plant system around our electrolyzer technology. San Carlos is also home to our Prototype Plant. Our Pilot Plant will be commissioned at our San Jose location.

EXHIBIT 2-1



6/21/24, 5:05 PM

About Electric Hydrogen - Solutions to achieve low-cost hydrogen

Electric Hydrogen announces a 1
Corporation – [Read More \(https://eh2.com/newsroom/2024/06/21/electric-hydrogen-announces-a-1mw-operating-plant-in-san-carlos-ca\)](https://eh2.com/newsroom/2024/06/21/electric-hydrogen-announces-a-1mw-operating-plant-in-san-carlos-ca)
scale electrolyzer plants with the AES



[. \(https://eh2.com\)](https://eh2.com)



large-scale electrolyzer plants with The AES
[new framework supply agreement for large-](https://eh2.com/newsroom/2024/06/21/electric-hydrogen-announces-a-1mw-operating-plant-in-san-carlos-ca)

San Francisco Bay Area



1MW Operating Plant
San Carlos, CA

10MW Operating Plant
San Jose, CA



EXHIBIT 2-1

Copyright © 2024 · Electric Hydrogen · [Sitemap \(https://eh2.com/sitemap/\)](https://eh2.com/sitemap/) · [Terms & Conditions \(https://eh2.com/terms-and-conditions/\)](https://eh2.com/terms-and-conditions/)

ELECTRIC HYDROGEN, EH2, and LCOH+ are registered trademarks of Electric Hydrogen Co. in the United States and internationally

 An official website of the United States government
[Here's how you know](#) 

[Back to home](#)

 Download  Print

18/761,178 | -:

Production of commercial electricity and commercial water WITHOUT need of solar, windmills, nuclear, hydroelectric and petroleum. Hydrogen is produced using Electrolysis whose input power is Hundred plus Human Bikers, USPTO app# 18/518994; USPTO #16/598965; USPTO 16/859711; USPTO #17/322938

PRIVATE VIEW

Application #	Confirmation #	Attorney Docket #	Patent #
18/761,178	2311	- Edit	-
Filing or 371 (c) date	Status		
-	Application Undergoing Preexam Processing 07/01/2024		

 Show/hide menu

Application data

Application type	Earliest publication #	Intl. registration # (Hague)
Utility	-	-
Examiner	Earliest publication date	Intl. registration publication date
-	-	-
Group art unit	Assignee for publication	
-	-	
Class/subclass	Confirmation #	
-/-	2311	
AIA (first inventor to file)		
-		
Entity status		
Regular Undiscounted Edit		

Correspondence address	Inventors	Applicants
165760 -Pedro N. Ibanez 29915 Mira Loma Dr. #29 Temecula, CA UNITED STATES	Pedro Norlito Ibáñez Temecula, CALIFORNIA (US)	



EXH 3-1

Receive updates from the USPTO

Enter your email to subscribe or update your preferences

[Subscribe](#)

[About the USPTO](#) · [Search for patents](#) · [Search for trademarks](#)

 An official website of the United States government
[Here's how you know](#) 

[Back to home](#)

 [Order certified copies](#)  [Download](#)  [Print](#)

18/518,994 | -:

Hundred persons cyclists to rotate 25megawatt Dynamo 24hrs for commercial electricity

PRIVATE VIEW

Application #	Confirmation #	Attorney Docket #	Patent #
18/518,994	3307	-Edit	-
Filing or 371 (c) date	Status		
11/26/2023	Application Undergoing Preexam Processing 11/26/2023		

 [Show/hide menu](#)

Application data

Application type	Earliest publication #	Intl. registration # (Hague)
Utility	-	-
Examiner	Earliest publication date	Intl. registration publication date
-	-	-
Group art unit	Assignee for publication	
-	-	
Class/subclass	Confirmation #	
-/-	3307	
AIA (first inventor to file)		
-		
Entity status		
Small Edit		

Correspondence address	Inventors	Applicants
165760 - Pedro N. Ibanez 29915 Mira Loma Dr. #29 Temecula, CA UNITED STATES	Pedro N Ibanez Temecula, CALIFORNIA (US)	

EXH - 3-2

Receive updates from the USPTO

Enter your email to subscribe or update your preferences

[Subscribe](#)

[About the USPTO](#) · [Search for patents](#) · [Search for trademarks](#)

[US Department of Commerce](#)
[Accessibility](#)
[Privacy Policy](#)
[Financial and Performance Data](#)

7/8/24, 7:26 PM

Yahoo Mail - TITLE of Invention: Production of commercial electricity and commercial ..

TITLE of Invention: Production of commercial electricity and commercial...

From: pete ibanez (admpeter@yahoo.com)

To: admpeter22@yahoo.com; admpeter22@gmail.com

Date: Monday, July 1, 2024 at 03:47 PM PDT

TITLE of Invention: Production of commercial electricity and commercial water WITHOUT need for solar, windmills, nuclear, hydrodams or petroleum. HYDROGEN is produced from Electrolysis, whose input power is from dynamo rotated by Hundred plus Human Bikers.

Claim One. This invention is a large mechanical combination of equipment that produces commercial electricity and clean commercial water WITHOUT need for solar, windmills, nuclear, hydrodams or petroleum; capital letters are used for emphasis; Hydrogen is produced by Electrolysis whose input power is from dynamo rotated by Hundred plus Bikers USPTO Application #18/518994

Said hydrogen will be used to boil large STEAM BOILER. Escaping high pressure steam will rotate a turbine or STAR GEAR that will rotate a larger Dynamo to produce commercial electricity.

Said large Steam Boiler has a built-in spout, which is the only exit for escaping high pressure steam;

Said large combination of equipment will also produce clean commercial water from Oceanwater using Desalination and Distillation.

Said large Steam Boiler with escaping high pressure steam will rotate large 100megawatt dynamos, using said Star Gear, which has a center rod that connects to center rod of said large dynamos;
Said megawatt dynamos using appropriate size rods;

Claim TWO: This mechanical equipment has no need for Solar, windmills, nuclear, hydrodams nor petroleum for power input, but may need batteries for power storage. This mechanical equipment combination will start operation with enough power stored in batteries.

Claim Three: This mechanical equipment invention is directly related to inventor's prior USpto applications 16/598965, 16/859711, 16/910001 and 17/322938.

In said above-mentioned prior art of this inventor, oceanwater Or saltwater is boiled inside () steam boilers.

In this inventor's original Patent Application 16/598965, input power to electrolysis' come from a portable 5000watt gasoline generator. This gasoline generator will now be REPLACED by 100KW dynamos or larger rotated by one hundred plus bikers, USPTO application # 18/518994;

Said steam boilers will produce high pressure steam that exit thru a built-in spout.

When said steam exits this steam boiler thru this spout, it will rotate the Star Gear. See Figure one and figure two diagrams and Parts List.

Said Star Gear is connected by a rod () to another ()large dynamo which produces more commercial electricity. Theoretically, it is possible to recharge the power batteries using the output of this second dynamo. This is normally done in electric vehicles. It is not perpetual motion as most metal parts will eventually rust and breakdown.

Claim FOUR: high pressure steam exits the steam boiler and rotate the Star Gear, this steam will be cooled down in the distillation coils () using oceanwater sprinklers () and air blowers. When hot steam is cooled down it returns to liquid potable drinkable water that no longer contains salt;

EXI 3-3

Said Distillation cooling coils are rapidly cooled by oceanwater sprinklers powered by said 500KW Dynamo;
Said Distillation cooling coils are rapidly cooled by large fan blowers powered by said 500KW Dynamo;

Said oceanwater has salt crystals that were removed thru Desalination and remained in the steam boiler. This remaining salt crystals will be extracted manually from the steam boilers using a removable opening on side of Steam Boiler.



UNITED STATES PATENT AND TRADEMARK OFFICE

UNITED STATES DEPARTMENT OF COMMERCE
 United States Patent and Trademark Office
 Address COMMISSIONER FOR PATENTS
 P.O. Box 1450
 Alexandria, Virginia 22313-1450
 www.uspto.gov

APPLICATION NUMBER	FILING OR 371(C) DATE	FIRST NAMED APPLICANT	ATTY. DOCKET NO./TITLE
16/598,965	10/10/2019	Pedro N. Ibanez	

CONFIRMATION NO. 5415

FORMALITIES LETTER



Date Mailed: 01/10/2020

Pedro N. Ibanez
 Apt 29
 29915 Mira Loma Dr.
 Temecula, CA 92592

NOTICE OF INCOMPLETE REPLY (NONPROVISIONAL)

Filing Date Granted

The U.S. Patent and Trademark Office has received your reply on 12/30/2019 to the NOTICE TO FILE MISSING PARTS OF NONPROVISIONAL APPLICATION (Notice) mailed 11/06/2019 and it has been entered into the application. The reply, however, is not a complete reply for the reason(s) listed below. A complete reply must be timely filed to prevent ABANDONMENT of the above-identified application. Replies should be mailed to: Mail Stop Missing Parts, Commissioner for Patents, P.O.Box 1450, Alexandria VA 22313-1450.

The period for reply continues to run from the date of the Notice mailed 11/06/2019. Applicant must submit all required items and pay any fees required below within two months from the date of the NOTICE TO FILE MISSING PARTS OF NONPROVISIONAL APPLICATION to avoid abandonment. If the reply is submitted after two months from the date of the NOTICE TO FILE MISSING PARTS OF NONPROVISIONAL APPLICATION, extensions of time may be obtained by filing a petition accompanied by the extension fee under the provisions of 37 CFR 1.136(a).

Items Required to Avoid Abandonment:

The required items noted below SHOULD be filed along with any items required above.

- Complete residence information, either city and state or city and country for **Pedro N. Ibanez** has not been provided. Residence information is required, separately from the mailing address, if the inventor lives at a location which is different from where the inventor customarily receives mail. Also, a valid state code or a valid country code must be provided. For lists of valid state and valid country codes, see the Instructions for Application Data Sheet available at <https://www.uspto.gov/patent/forms/forms-patent-applications-filed-or-after-september-16-2012>. There is an indication on either the ADS or the inventor's oath or declaration that the mailing address and residence information is not the same for this inventor.

Applicant must provide the residence information on either:

- An inventor's oath or declaration in compliance with 37 CFR 1.63, or
- A properly marked up application data sheet (ADS) in compliance with 37 CFR 1.76.
- A complete mailing address that includes either the city and state or city and country, for each inventor has not been submitted. Applicant must provide the mailing address on either:
 - An inventor's oath or declaration in compliance with 37 CFR 1.63, or
 - A properly marked up application data sheet (ADS) in compliance with 37 CFR 1.76.

Note that an inventor's mailing address is required even if a correspondence address has been submitted. An inventor's mailing address may not necessarily be the same as the correspondence address for

EXH 3-4

- The ADS submitted on 12/30/2019 was not properly marked up to show the desired changes. For information being changed relative to the information already of record, additions must be shown with underlining, and deletions must be shown with strike-through or brackets. See 37 CFR 1.76(c)(2)

In order to make changes to the information of record, an ADS must be properly signed and properly marked up relative to the current information of record.

Proper signature: The ADS must be signed with a handwritten signature or proper S-signature by:

- A patent practitioner, with the practitioner's registration number accompanying the signature (e.g., immediately below or adjacent to the signature), or
- The applicant, if the applicant is an individual other than the inventor(s) and no power of attorney has been appointed, or
- All of the inventors, if no other applicant has been established and no power of attorney has been appointed.

A proper S-signature consists of only letters and/or Arabic numerals, with appropriate spaces and commas, periods, apostrophes, or hyphens for punctuation contained between a first single forward slash mark before, and a second single forward slash mark after, the S-signature.

Proper markings: The ADS must identify the changes being made with underlining for insertions and strike-through or brackets for text removed. No other markings or indications are acceptable. Where an ADS providing corrected or updated information does not contain all of the sections of the ADS, the entire section in which changes are being made must be included in the ADS. Information of record can generally be found on the latest filing receipt.

EX 14 3-5

An official website of the United States government
 Here's how you know

[Back to home](#)

Order certified copies Download Print

16/598,965 | -:

SALTWATER RIVERWATER H2O RESIDENTIAL COMMERCIAL HYDROGEN OXYGEN ELECTRIC POWER GENERATOR. WATER IS CONVERTED TO MECHANICAL POWER AND ELECTRICITY USING ELECTROLYSIS AND A STEAM ENGINE. THE STEAM ENGINE ROTATES THE DYNAMO THAT PRODUCES ELECTRICITY

PUBLIC VIEW

Application #	Confirmation #	Attorney Docket #	Patent #
16/598,965	5415	-	-
Filing or 371 (c) date	Status		
10/10/2019	Abandoned--Incomplete Application (Pre-examination) 07/07/2020		

Show/hide menu

Application data

Application type	Earliest publication #	Intl. registration # (Hague)
Utility	-	-
Examiner	Earliest publication date	Intl. registration publication date
-	-	-
Group art unit	Assignee for publication	
-	-	
Class/subclass	Confirmation #	
-/-	5415	
AIA (first inventor to file)		
-		
Entity status		
Micro		

Correspondence address	Inventors	Applicants
-Pedro N. Ibanez Apt 29 29915 Mira Loma Dr. Temecula, CA UNITED STATES	Pedro N. Ibanez	EXH 3-6

Receive updates from the USPTO

Enter your email to subscribe or update your preferences

your@email.com

Subscribe

About the USPTO · Search for patents · Search for trademarks

US PATENT & TRADEMARK OFFICE
 PATENT APPLICATION FULL TEXT AND IMAGE DATABASE

[Help](#) [Home](#) [Boolean](#) [Manual](#) [Number](#) [PTDLs](#)
[Hit List](#) [Next](#) [Bottom](#)
[View Shopping Cart](#) [Add to Shopping Cart](#)
[Images](#)

(1 of 9)

United States Patent Application 20210001243
Kind Code A1
Ibanez; Pedro Norlito January 7, 2021

OCEANWATER DESALINATION DISTILLATION POWERED BY (HHO) HYDROGEN AND OXYGEN

Abstract

The State of California has been in severe drought conditions yet ironically it is surrounded by oceanwater. Existing desalination systems require expensive electrical power to produce clean potable water. This invention creates its own electrical power input, and even EXTRA ELECTRICAL POWER to supplement California's electrical power grid (part of this inventor's other U.S. patent application Ser. No. 16/598,965. Desalination and Distillation are two concepts that now belong to public domain and are not owned by anyone. Oceanwater is boiled and salt is left behind, in the process producing clean potable water. Steam is cooled down using cooling coils similar to car radiator, using a blower fan and oceanwater sprinklers.

Inventors: *Ibanez; Pedro Norlito; (Temecula, CA)*

Applicant:	Name	City	State	Country	Type
	Ibanez; Pedro Norlito	Temecula	CA	US	

Family ID: 74065534

Appl. No.: 16/859711

Filed: May 14, 2020

Related U.S. Patent Documents

<u>Application Number</u>	<u>Filing Date</u>	<u>Patent Number</u>
16598965	Oct 10, 2019	
16859711		EX 11 3-7

Current U.S. Class:

1/1

Current CPC Class:

C02F 1/043 20130101; B01D 5/0006 20130101; B01D 1/0011 20130101; B01D 1/0017 20130101; B01D 1/02 20130101; B01D



UNITED STATES DEPARTMENT OF COMMERCE
 United States Patent and Trademark Office
 Address: COMMISSIONER FOR PATENTS
 P.O. Box 1450
 Alexandria, Virginia 22313-1450
 www.uspto.gov

APPLICATION NO.	FILING DATE	FIRST NAMED INVENTOR	ATTORNEY DOCKET NO.	CONFIRMATION NO.
16/859,711	05/14/2020	Pedro Norlito Ibanez		5276
	7590 12/29/2020			
Pedro N Ibanez 29915 Mira Loma dr unit29 29 Temecula, CA 92592			EXAMINER PILCHER, JONATHAN L	
			ART UNIT	PAPER NUMBER
			1772	
			MAIL DATE	DELIVERY MODE
			12/29/2020	PAPER

Please find below and/or attached an Office communication concerning this application or proceeding.

The time period for reply, if any, is set in the attached communication.

EXH 3-8

The country code and number of your priority application, to be used for filing abroad under the Paris Convention, is **US 16/859,711**

Projected Publication Date: To Be Determined - pending completion of Missing Parts

Non-Publication Request: No

Early Publication Request: Yes

**** SMALL ENTITY ****

Title

OCEANWATER DESALINATION DISTILLATION POWERED BY (HHO) HYDROGEN AND OXYGEN

Preliminary Class

Statement under 37 CFR 1.55 or 1.78 for AIA (First Inventor to File) Transition Applications: Yes

PROTECTING YOUR INVENTION OUTSIDE THE UNITED STATES

Since the rights granted by a U.S. patent extend only throughout the territory of the United States and have no effect in a foreign country, an inventor who wishes patent protection in another country must apply for a patent in a specific country or in regional patent offices. Applicants may wish to consider the filing of an international application under the Patent Cooperation Treaty (PCT). An international (PCT) application generally has the same effect as a regular national patent application in each PCT-member country. The PCT process **simplifies** the filing of patent applications on the same invention in member countries, but **does not result** in a grant of "an international patent" and does not eliminate the need of applicants to file additional documents and fees in countries where patent protection is desired.

Almost every country has its own patent law, and a person desiring a patent in a particular country must make an application for patent in that country in accordance with its particular laws. Since the laws of many countries differ in various respects from the patent law of the United States, applicants are advised to seek guidance from specific foreign countries to ensure that patent rights are not lost prematurely.

Applicants also are advised that in the case of inventions made in the United States, the Director of the USPTO must issue a license before applicants can apply for a patent in a foreign country. The filing of a U.S. patent application serves as a request for a foreign filing license. The application's filing receipt contains further information and guidance as to the status of applicant's license for foreign filing.

Applicants may wish to consult the USPTO booklet, "General Information Concerning Patents" (specifically, the section entitled "Treaties and Foreign Patents") for more information on timeframes and deadlines for filing foreign patent applications. The guide is available either by contacting the USPTO Contact Center at 800-786-9199, or it can be viewed on the USPTO website at <http://www.uspto.gov/web/offices/pac/doc/general/index.html>.

For information on preventing theft of your intellectual property (patents, trademarks and copyrights), you may wish to consult the U.S. Government website, <http://www.stopfakes.gov>. Part of a Department of Commerce initiative, this website includes self-help "toolkits" giving innovators guidance on how to protect intellectual property in specific countries such as China, Korea and Mexico. For questions regarding patent enforcement issues, applicants may call the U.S. Government hotline at 1-866-999-HALT (1-866-999-4258).

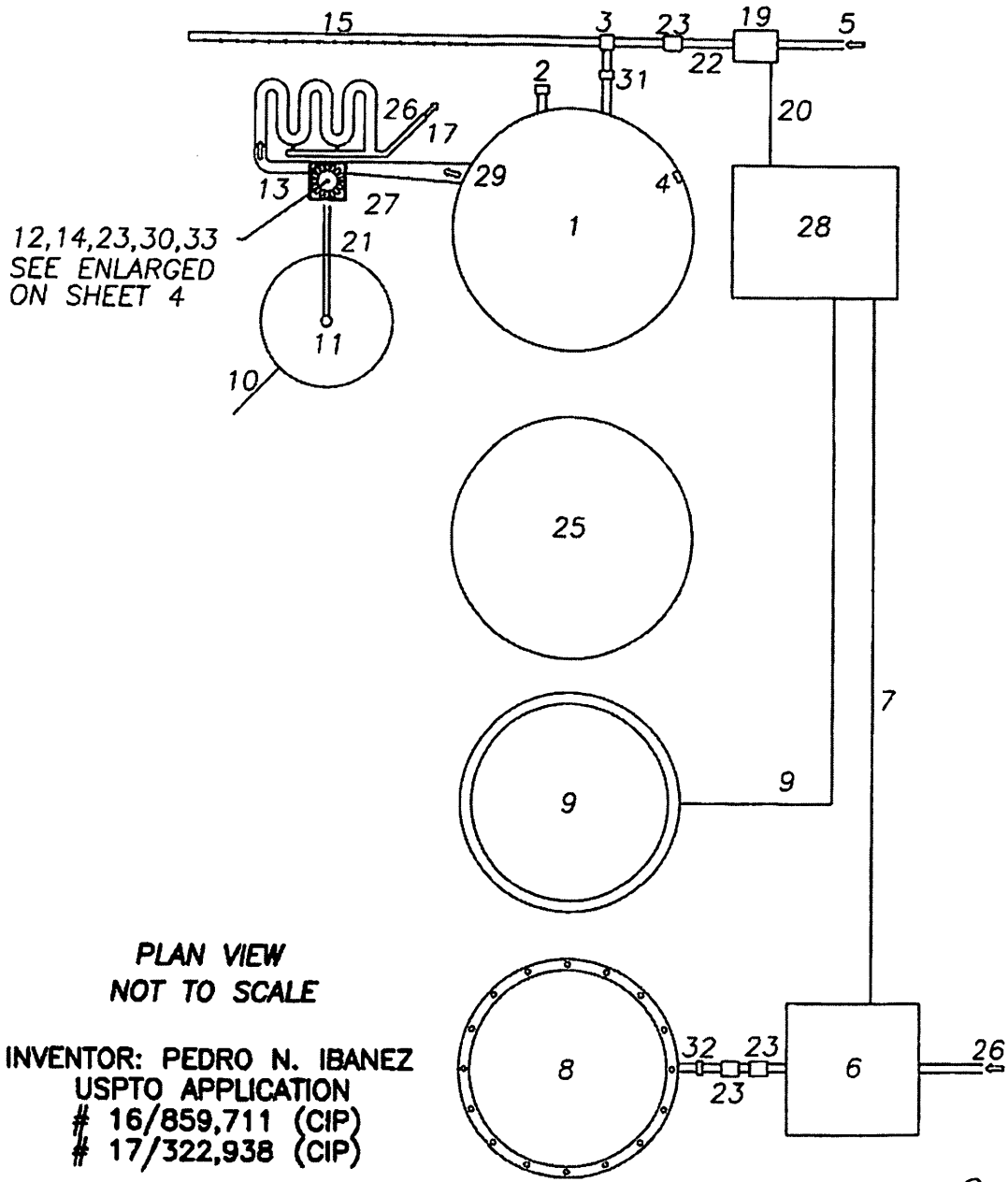
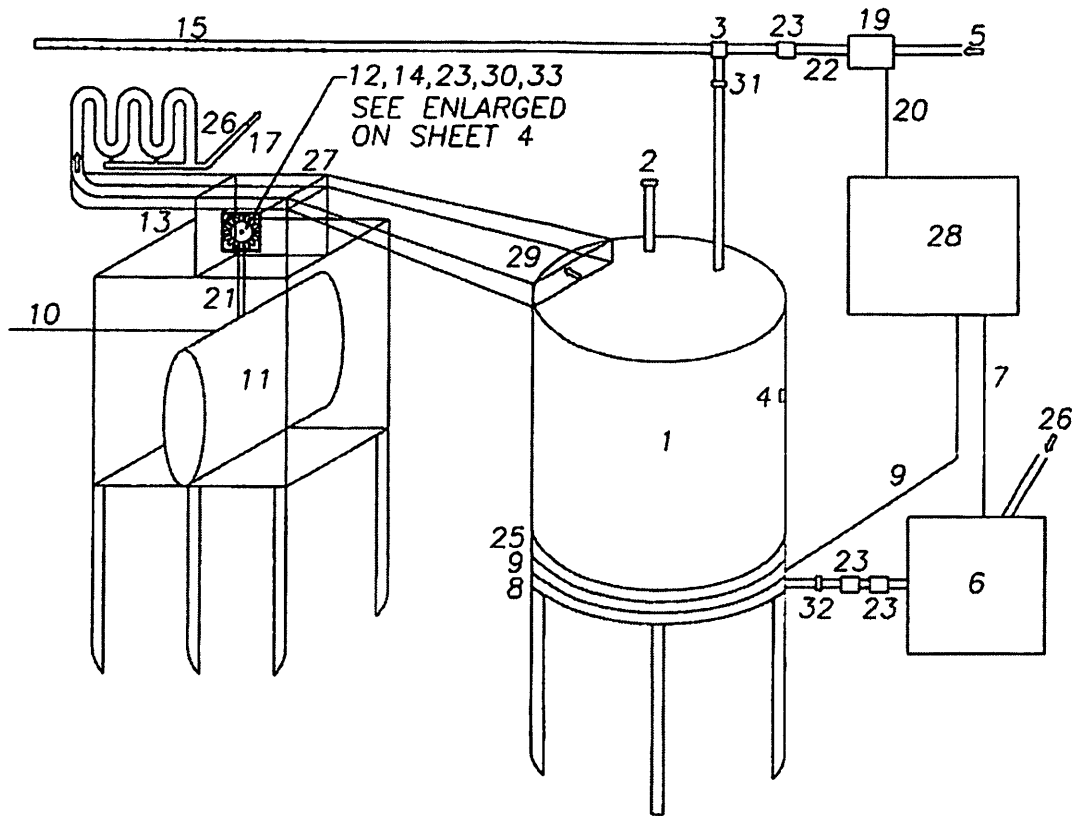


FIG. 1



ISOMETRIC VIEW
NOT TO SCALE

INVENTOR: PEDRO N. IBANEZ
USPTO APPLICATION
16/859,711 (CIP)
17/322,938 (CIP)

FIG. 1

Exit 3-14

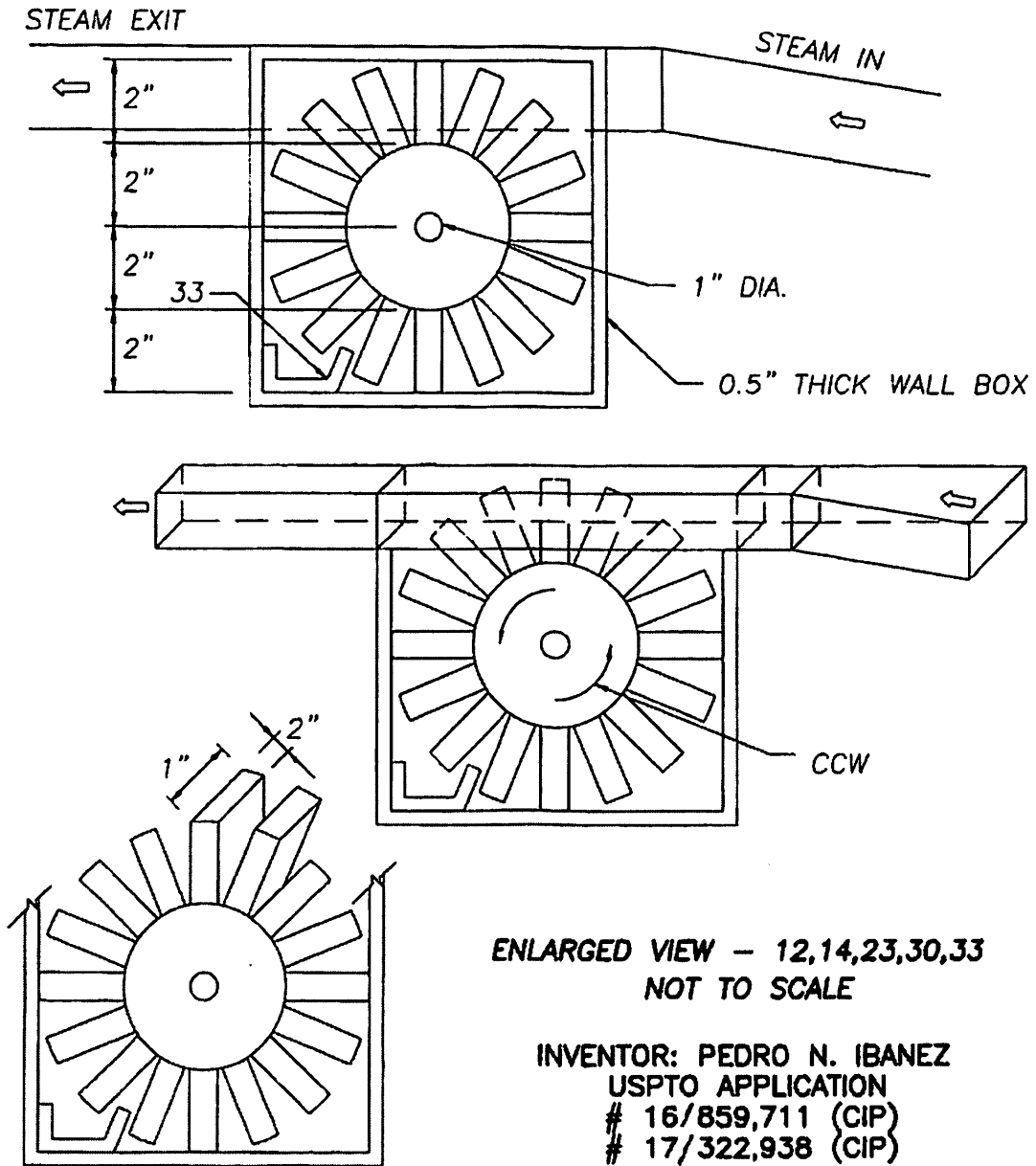


FIG. 1

EXH 3-12



US 20210340030A1

(19) **United States**
 (12) **Patent Application Publication** (10) **Pub. No.: US 2021/0340030 A1**
Ibanez (43) **Pub. Date: Nov. 4, 2021**

(54) **DESALINATION DISTILLATION
 COMMERCIAL POWER AND WATER
 GENERATION USING HHO ELECTROLYSIS
 AND STEAM BOILER**

F01K 7/44 (2006.01)
C25B 1/04 (2006.01)
 (52) **U.S. Cl.**
 CPC *C02F 1/447* (2013.01); *F01K 25/005*
 (2013.01); *C02F 2103/08* (2013.01); *C25B*
1/04 (2013.01); *F01K 7/44* (2013.01)

(71) Applicant: **Pedro Norlito Ibanez, Temecula, CA**
 (US)

(72) Inventor: **Pedro Norlito Ibanez, Temecula, CA**
 (US)

(21) Appl. No.: **17/322,938**

(22) Filed: **Jun. 9, 2021**

Related U.S. Application Data

(63) Continuation-in-part of application No. PCT/US21/
 32761.

Publication Classification

(51) **Int. Cl.**
C02F 1/44 (2006.01)
F01K 25/00 (2006.01)

(57) **ABSTRACT**

This Desalination Distillation Commercial Power Generation invention is powered by Hydrogen and Oxygen produced thru electrolysis. Present art desalination plants either use desalination distillation Or Reverse Osmosis. Both methods require large amounts of electrical power This invention uses desalination distillation. In this method, oceanwater is boiled and steamed then cooled down back to clean water while in the process producing electricity. Electrolysis is the process of breaking water (H2O) to its molecular atoms of Hydrogen gas and Oxygen gas. Using Clean Purified water (which is similar to Distilled Water) is the most efficient way to produce hydrogen. This invention will produce Clean Water and generate commercial electricity.

EXH 3-13

US 2021/0340030 A1

Nov. 4, 2021

1

**DESALINATION DISTILLATION
COMMERCIAL POWER AND WATER
GENERATION USING HIGH ELECTROLYSIS
AND STEAM BOILER**

[0001] This Desalination Distillation Commercial Power Generation invention is powered by Hydrogen and Oxygen produced thru electrolysis. Present art desalination plants either use desalination distillation Or Reverse Osmosis. Both methods require large amounts of electrical power. This invention uses desalination distillation. In this method, oceanwater is boiled and steamed then cooled down back to liquid and Clean Water is produced. When oceanwater is boiled the salt part of the liquid is left behind in the tank and eventually must be removed. This invention will have automatic device that will empty the Boiler tank, open a Panel on the side of the tank and scoop out the residual salt, then seal the tank again and refill with oceanwater.

[0002] Distillation follows after oceanwater has boiled. Distillation can be easily compared to the normal everyday car's radiator system. The car needs to regulate the temperature of the engine for the car to function normally. The car does this by having water or radiator fluid flowing around the engine and in so doing this liquid is heated and boiled. This liquid around the engine must be cooled down. The boiled liquid (steam) will travel from the engine to the car's radiator using tubes that total several meters long. These tubes that contain the steam are exposed to the atmosphere while the car engine is running. Exposing the steam to the atmosphere will start to lower the temperature of the Steam and this is helped along by a blower fan that forces more cooler air around the tubes. This process will return the steam to liquid state, and this cooler liquid will be recycled around the engine, and the process starts all over again.

[0003] The main difference between the car's radiator and the desalination plant is that the cooled liquid is Not returned to an engine. The cooled water is now Clean Water that can be used by the Electrolyzer. Clean distilled water is the most efficient electrolyte for the Electrolyzer.

[0004] Electrolysis is the process of breaking water (H₂O) to its molecular atoms of Hydrogen gas and Oxygen gas. Using Clean Purified water (which is similar to Distilled Water) is the most efficient way to produce hydrogen. This invention will produce Clean Water.

[0005] Because hydrogen and oxygen are clean breathable elements, there is the bonus addition of no adverse affect to the environment. This is excellent Contrast to present day Desalination plants that may derive its electrical input from Dirty Coal or expensive Oil.

[0006] One problem with using oceanwater as the electrolyte for this electrolysis is corrosion from chlorine found in seawater that eventually will corrode the hydrogen terminal and stop the process. There are now devices and catalysts available in the market that stops this corrosion and makes seawater as a viable electrolyte. This invention needs no outside devices or catalyst because it produces clean water.

[0007] It is important to note that there are available in 2020 electrolysis machines (called Electrolyzer) in particular eBay.com, Kit electrolyzers 110V that produce anywhere from 75 Liters per Hour of hydrogen to as much as 150 Liters per Hour. A 1000 gallons Steam Boiler Tank will need about 150 LPH of Hydrogen gas to boil the oceanwater inside Boiler Tank (Pressure Vessel).

[0008] The Clean Water produced will be fed into the water intake of the Electrolyzer. Clean water used as electrolyte by the Electrolyzer becomes depleted as the water is broken down and Hydrogen gas and Oxygen gas are produced.

[0009] Hydrogen Gas Distributor Circle. As the name implies it is a round tube that has holes to expel the hydrogen gas as it burns. This is comparable to normal household stove that uses natural gas or propane. The hydrogen gas comes out of the Distributor Circle and is burned to heat the Steam Boiler.

[0010] An electrolysis machine or Electrolyzer needs electricity to produce Hydrogen. There are a few ways to provide the electrical input to the Electrolyzer.

[0011] 1. Solar Panel with enough wattage.

[0012] 2. Wind Mill power generators are more efficient than solar power since there are areas in the country that provide enough wind push 24 hours per day, day or night.

[0013] 3. This invention will provide electrical input to its Electrolyzer from a 5000 watt 110V/220V Portable Gasoline Generator.

[0014] Electrolyzer electrical input will come from 5000 Watt 110V/220V Portable Gasoline Generator that can easily be purchased from your local Home Depot. One 150 LPH hydrogen Electrolyzer will need about 300 watts according to Label Specifications. With one 150 LPH hydrogen Electrolyzer needed for a 1000 gallons Steam Boiler, one 5000 Watt portable generator will be more than sufficient. With inventor's personal experience a 5000 Watt 110V/220V gasoline generator can power two 60 watt light bulbs and one 500 watt 8000 BTU small air-conditioner 200 sqft room for 24 hours using about 15 gallons of gasoline. There are available 8000 watt portable gasoline generator.

[0015] The US Patent Office does not require an invention to be cost effective, but certain countries in Europe and Japan require cost effectiveness. This invention is cost effective. At present March 2021 average gasoline price in California of \$4 per gallon, it would cost about \$60 per day to operate a 1000 gallon Steam Boiler Desalination Distillation Power Generation system to include one 1200 watt ½ HP water pump and two 100 watt blower fan motors.

[0016] This 1000 gallon Steam Boiler will empty out into clean water in about six to eight hours depending on the demands of the Electrolyzer, and Dynamo, so therefore new seawater needs to be pumped into the boiler tank by the ½ HP 700 GPH water pump. Clean water output can be adjusted by lowering Hydrogen gas output burn.

**HOW THE DESALINATION DISTILLATION
COMMERCIAL POWER GENERATION
SYSTEM WORKS** EXH 3-14

[0017] Steam Boiler should start with a full 1000 gallons of COLD SEAWATER. As soon as Portable Generator is turned on, Electrolyzer will start to produce Hydrogen which is lit and burned to provide heat to Steam Boiler. Hydrogen gas comes out of Hydrogen Distributor Circle. At the same time Blower Fan turns on and Water pump starts feeding oceanwater Only to the Sprinklers that will cool down the Steam. Water pump does not start pumping oceanwater into Boiler Tank until Water Level Switch turns on when oceanwater inside boiler Tank reaches a certain low level.

US 2021/0340030 A1

Nov. 4, 2021

2

[0018] As oceanwater inside Steam Boiler reaches boiling temperature, steam can only Exit out of the Boiler Tank Spout and then this steam Must Turn the Cup Rotators, as the Cup Rotators can only turn One Way. As the Steam escapes it turns the Cup Rotators which is sealed inside the a cup Rotator Box. The distance between the top and side edge of the Cup Rotators and the walls of Cup Rotator Box is very small, about 500th of an inch to prevent the steam from escaping Without Turning the Cup Rotators, which can only turn One way. The Cup Rotators is connected by the Dynamo Shaft to the Dynamo.

[0019] Dynamos are copper coils wound around a magnet which creates a Magnetic Field. When this magnetic field is disturbed by turning the copper coils Or the magnet, electricity is produced. Large Dynamos that turn at high speed can produce megawatts of commercial electricity.

[0020] A simple example of a dynamo producing electricity is a Bicycle Dynamo. As the biker turns the pedal, the bike dynamo turns and produces enough electricity to light the bike headlight. In comparison Large River dams such as Hoover Dam drops tons of water into large pipes that have wheels that are comparable to Cup Rotators of this Invention. Tons of water force these giant water cup rotators, which are connected to Large Dynamos to turn and produce commercial electricity.

[0021] After the Steam gets pass the Cup Rotators, they go into the Cooling Coils. Steam is now being cooled by Oceanwater Sprinklers and Blower Fans. STEAM returns to CLEAN LIQUID WATER STATE. Some of this Clean Water will go to Electrolyzer to become electrolyte, to produce more hydrogen gas. Safety is assured by Pressure Relief Valve which releases pressure at 165 PSI for a 200 PSI STEAM BOILER. The cycle repeats itself as long as there is gasoline in the portable generator.

What is claimed:

ONE Methods, Combinations, Configurations and Similar Apparatus that are safely mechanically and electrically merged together to Produce and/or results in Commercial Power and commercial amounts of clean water, and/or escalating amounts, by using (H₂O) hydrogen and/or oxygen from electrolysis, desalination and distillation, using Steam Boilers, using gears or Cup Rotators, that rotate and turn an electrical Dynamo, such rotations are what create electrical output.

Commercial electrical power is measured in megawatts while commercial clean water is measured in Cubic Hectares.

Electrolysis is the process of breaking water (H₂O) to its molecular atoms of Hydrogen gas and Oxygen gas. Using Clean Purified water (which is similar to Distilled Water) is the most efficient way to produce hydrogen. This invention will produce Clean Water and Commercial Power.

It is important to note that there are available in year 2020 electrolysis machines (called Electrolyzer) in particular eBay.com, Kit electrolyzers 110V that produce anywhere from 75 LPH (liters per hour) of hydrogen to as much as 150 Liters per Hour. A 1000 gallons Steam Boiler Tank will need about 150 LPH of Hydrogen gas to boil the oceanwater inside Boiler Tank (Pressure Vessel).

The Clean Water produced will be fed into the water intake of the Electrolyzer. Clean water used as electro-

lyte by the Electrolyzer becomes depleted as the water is broken down and Hydrogen gas and Oxygen gas are produced.

Desalination is producing clean water from ocean water by boiling saltwater. When saltwater is boiled, residual salt crystals are left behind in the boiling container or Steam Boiler. This invention will have an automatic device that will empty the Boiler tank, open a Panel on the side of the tank and scoop out the residual salt, then seal the tank again and refill with oceanwater.

Distillation is the cooling down of Steam that results in production of clean water. Clean water means that biological toxins and salt crystals are removed by boiling. Distillation can be compared to a car engine. Distillation follows after oceanwater has boiled. Distillation can be easily compared to the normal everyday car's radiator system. The car needs to regulate the temperature of the engine for the car to function normally. The car does this by having water or radiator fluid flowing around the engine and in so doing this liquid is heated and boiled. This liquid around the engine must be cooled down. The boiled liquid (steam) will travel from the engine to the car's radiator using tubes that total several meters long. These tubes that contain the steam are exposed to the atmosphere while the car engine is running. Exposing the steam to the atmosphere will start to lower the temperature of the Steam and this is helped along by a blower fan that forces cooler air around the tubes. This process will return the steam to liquid state, and this cooler liquid will be recycled around the engine, and the process starts all over again.

The main difference between the car's radiator and the desalination plant is that the cooled liquid is Not returned to an engine. The cooled water is now Clean Water that can be used by the Electrolyzer or for agricultural and residential use. Clean distilled water is the most efficient electrolyte for the Electrolyzer.

What is Unique and innovative about this Invention is the Merging together of all this Old concepts and the use primarily of Hydrogen, which is the most abundant element on this planet. Using hydrogen thereby makes this invention Environmentally Friendly as there is zero carbon emissions from this invention. This invention believes that Wind Mills Power Input is a very cost-effective electrical input to the Electrolyzer.

The Electrolyzer of this Invention requires 110V household electrical input which can be provided by 5000 watt 110V PGG (portable gasoline generator) which is available at many local hardware stores such as Home Depot{C}. This invention continues to provide Electrical Output and Clean Water as long as there is gasoline in the PGG.

TWO Refer to following as attachments to Claim Two: FIG. 1. DRAWING DIAGRAM OF HHO DESALINATION DISTILLATION COMMERCIAL POWER GENERATION AND DESCRIPTION OF PARTS.

HOW THE DESALINATION DISTILLATION COMMERCIAL POWER GENERATION AND CLEAN WATER PRODUCTION SYSTEM WORKS.

Steam Boiler should start with a full 1000 gallons of COLD SEAWATER. As soon as Portable Generator (PGG) is turned on, Electrolyzer will start to produce Hydrogen which is lit and burned to provide heat to

EXH 3-15

US 2021/0340030 A1

Nov. 4, 2021

3

Steam Boiler. Hydrogen gas comes out of Hydrogen Distributor Circle. At the same time Blower Fan turns on and Water pump starts feeding oceanwater Only to the Sprinklers that will cool down the Steam. Water pump does not start pumping oceanwater into Boiler Tank until Water Level Switch turns on when oceanwater inside boiler Tank reaches a certain low level.

As oceanwater inside Steam Boiler reaches boiling temperature, steam can only Exit out of the Boiler Tank Spout and then this steam Must Turn the Cup Rotators, as the Cup Rotators can only turn One Way. Cup Rotators are any such apparatus that limit the escape of steam from the Steam Boiler. In this apparatus. Steam must turn the Cup Rotators in order to escape out of the Steam Boiler. As the Steam escapes it turns the Cup Rotators which is sealed inside the a cup Rotator Box. The distance between the top and side edge of the Cup Rotators and the walls of Cup Rotator Box is very small, about 500th of an inch to prevent the steam from escaping Without Turning the Cup Rotators, which can only turn One away. The Cup Rotators is connected by the Dynamo Shaft to the Dynamo.

Dynamos are copper coils wound around a magnet which creates a Magnetic Field. When this magnetic field is disturbed by turning the copper coils Or the magnet. electricity is produced. Large Dynamos that turn at high speed can produce megawatts of commercial electricity.

A simple example of a dynamo producing electricity is a Bicycle Dynamo. As the biker turns the pedal, the bike dynamo turns and produces enough electricity to light the bike headlight. In comparison Large River dams such as Hoover Dam drops tons of water into large pipes that have wheels that are comparable to Cup Rotators of this Invention. Tons of water force these giant water cup rotators, which are connected to Large Dynamos to turn and produce commercial electricity. After the Steam gets pass the Cup Rotators, they go into the Cooling Coils. Steam is now being cooled by Oceanwater Sprinklers and Blower Fans. STEAM returns to CLEAN LIQUID WATER STATE. Some of this Clean Water will go to Electrolyzer to become electrolyte. to produce more hydrogen gas. Safety is assured by Pressure Relief Valve which releases pressure at 165 PSI for a 200 PSI STEAM BOILER. The cycle repeats itself as long as there is gasoline in the portable generator.

THREE! Secondary power to heat Steam Boiler can come from Electric Heater Coils. These heater coils are similar to heater coils of most normal household electrical stoves. These Electric Heater Coils acquire electrical input from PGG. In this secondary power condition the Electric Heater Coils take the place the Hydrogen Electrolyzer. But in this Mode, environmental friendliness is Lost, but can be regained if the community Power Grid is powered by Hydrogen!!

* * * * *

EXH 3-16



US 20210340030A1

(19) **United States**
 (12) **Patent Application Publication** (10) **Pub. No.: US 2021/0340030 A1**
Ibanez (43) **Pub. Date: Nov. 4, 2021**

(54) **DESALINATION DISTILLATION
 COMMERCIAL POWER AND WATER
 GENERATION USING HHO ELECTROLYSIS
 AND STEAM BOILER**

F01K 7/44 (2006.01)
C25B 1/04 (2006.01)
 (52) **U.S. Cl.**
 CPC *C02F 1/447* (2013.01); *F01K 25/005*
 (2013.01); *C02F 2103/08* (2013.01); *C25B*
1/04 (2013.01); *F01K 7/44* (2013.01)

(71) Applicant: **Pedro Norlito Ibanez**, Temecula, CA
 (US)

(72) Inventor: **Pedro Norlito Ibanez**, Temecula, CA
 (US)

(21) Appl. No.: **17/322,938**

(22) Filed: **Jun. 9, 2021**

Related U.S. Application Data

(63) Continuation-in-part of application No. PCT/US21/
 32761.

Publication Classification

(51) **Int. Cl.**
C02F 1/44 (2006.01)
F01K 25/00 (2006.01)

(57) **ABSTRACT**

This Desalination Distillation Commercial Power Generation invention is powered by Hydrogen and Oxygen produced thru electrolysis. Present art desalination plants either use desalination distillation Or Reverse Osmosis. Both methods require large amounts of electrical power. This invention uses desalination distillation. In this method, oceanwater is boiled and steamed then cooled down back to clean water while in the process producing electricity. Electrolysis is the process of breaking water (H2O) to its molecular atoms of Hydrogen gas and Oxygen gas. Using Clean Purified water (which is similar to Distilled Water) is the most efficient way to produce hydrogen. This invention will produce Clean Water and generate commercial electricity.

EXH 3-17

6/24/24, 5:22 PM

301-Ownership/Assignability of Patents and Applications

PATENT OFFICE ASSIGNABILITY PROVISIONS UNDER FEDERAL PATENT LAWS

301 Ownership/Assignability of Patents and Applications [R-10.2019]

EXH 4-1

35 U.S.C. 261 Ownership; assignment.

Subject to the provisions of this title, patents shall have the attributes of personal property. The Patent and Trademark Office shall maintain a register of interests in patents and applications for patents and shall record any document related thereto upon request, and may require a fee therefor.

Applications for patent, patents, or any interest therein, shall be assignable in law by an instrument in writing. The applicant, patentee, or his assigns or legal representatives may in like manner grant and convey an exclusive right under his application for patent, or patents, to the whole or any specified part of the United States.

A certificate of acknowledgment under the hand and official seal of a person authorized to administer oaths within the United States, or, in a foreign country, of a diplomatic or consular officer of the United States or an officer authorized to administer oaths whose authority is proved by a certificate of a diplomatic or consular officer of the United States, or apostille of an official designated by a foreign country which, by treaty or convention, accords like effect to apostilles of designated officials in the United States, shall be prima facie evidence of the execution of an assignment, grant, or conveyance of a patent or application for patent.

An interest that constitutes an assignment, grant, or conveyance shall be void as against any subsequent purchaser or mortgagee for valuable consideration, without notice, unless it is recorded in the Patent and Trademark Office within three months from its date or prior to the date of such subsequent purchase or mortgage.

35 U.S.C. 262 Joint owners.

In the absence of any agreement to the contrary, each of the joint owners of a patent may make, use, offer to sell, or sell the patented invention within the United States, or import the patented invention into the United States, without the consent of and without accounting to the other owners.

37 CFR 3.1 Definitions.

For purposes of this part, the following definitions shall apply:

Application means a national application for patent, an international patent application that designates the United States of America, an international design application that designates the United States of America, or an application to register a trademark under section 1 or 44 of the Trademark Act, 15 U.S.C. 1051 or 15 U.S.C. 1126, unless otherwise indicated.

Assignment means a transfer by a party of all or part of its right, title and interest in a patent, patent application, registered mark or a mark for which an application to register has been filed.

Document means a document which a party requests to be recorded in the Office pursuant to [§ 3.11 \(mpep-9020-appx-r.html#d0e336150\)](#) and which affects some interest in an application, patent, or registration.

Office means the United States Patent and Trademark Office.

Recorded document means a document which has been recorded in the Office pursuant to [§ 3.11 \(mpep-9020-appx-r.html#d0e336150\)](#).

Registration means a trademark registration issued by the Office.

I. OWNERSHIP

Ownership of a patent gives the patent owner the right to exclude others from making, using, offering for sale, selling, or importing into the United States the invention claimed in the patent. [35 U.S.C. 154\(a\)\(1\) \(mpep-9015-appx-l.html#d0e303482\)](#). Ownership of the patent does not furnish the owner with the right to make, use, offer for sale, sell, or import the claimed invention because there may be other legal considerations precluding same (e.g., existence of another patent owner with a dominant patent, failure to obtain FDA approval of the patented invention, an injunction by a court against making the product of the invention, or a national security related issue).

For applications filed on or after September 16, 2012, the original applicant is presumed to be the owner of the application for an original patent. See [37 CFR 3.73\(a\) \(mpep-9020-appx-r.html#d0e336740\)](#). For applications filed before September 16, 2012, the ownership of the patent (or the application for the patent) initially vests in the named inventors of the invention of the patent. See *Beech Aircraft Corp. v. EDO Corp.*, 990 F.2d 1237, 1248, 26 USPQ2d 1572, 1582 (Fed. Cir. 1993). A patent or patent application is assignable by an instrument in writing, and the assignment of the patent, or patent application, transfers to the assignee(s) an alienable (transferable) ownership interest in the patent or application. [35 U.S.C. 261 \(mpep-9015-appx-l.html#d0e305441\)](#).

II. ASSIGNMENT

"Assignment," in general, is the act of transferring to another the ownership of one's property, i.e., the interest and rights to the property. The U.S. Patent and Trademark Office cannot explain or interpret laws that govern assignments and related documents, nor can it act as counselor for individuals. Assignments and other documents are contracts that are governed by the relevant state or jurisdictional law.

6/24/24, 5:22 PM

301-Ownership/Assignability of Patents and Applications

In [37 CFR 3.1](#) ([mpep-9020-appx-r.html#d0e336097](#)), assignment of patent rights is defined as "a transfer by a party of all or part of its right, title and interest in a patent [or] patent application...." An assignment of a patent, or patent application, is the transfer to another of a party's entire ownership interest or a percentage of that party's ownership interest in the patent or application. In order for an assignment to take place, the transfer to another must include the entirety of the bundle of rights that is associated with the ownership interest, i.e., all of the bundle of rights that are inherent in the right, title and interest in the patent or patent application. [35 U.S.C. 261](#) ([mpep-9015-appx-l.html#d0e305441](#)), requires transfer of ownership by an assignment to be in writing. See *Realvirt, LLC v. Lee*, 195 F.Supp.3d 847, 859 (E.D. Va. 2016).

III. LICENSING

As compared to assignment of patent rights, the licensing of a patent transfers a bundle of rights which is less than the entire ownership interest, e.g., rights that may be limited as to time, geographical area, or field of use. A patent license is, in effect, a contractual agreement that the patent owner will not sue the licensee for patent infringement if the licensee makes, uses, offers for sale, sells, or imports the claimed invention, as long as the licensee fulfills its obligations and operates within the bounds delineated by the license agreement.

An exclusive license may be granted by the patent owner to a licensee. The exclusive license prevents the patent owner (or any other party to whom the patent owner might wish to sell a license) from competing with the exclusive licensee, as to the geographic region, the length of time, and/or the field of use, set forth in the license agreement.

A license is not an assignment of the patent. Even if the license is an exclusive license, it is not an assignment of patent rights in the patent or application.

IV. INDIVIDUAL AND JOINT OWNERSHIP

Individual ownership - An individual entity may own the entire right, title and interest of the patent property. This occurs where there is only one inventor, and the inventor has not assigned the patent property. Alternatively, it occurs where all parties having ownership interest (all inventors and assignees) assign the patent property to one party.

Joint ownership - Multiple parties may together own the entire right, title and interest of the patent property. This occurs when any of the following cases exist:

- (A) Multiple partial assignees of the patent property;
- (B) Multiple inventors who have not assigned their right, title and interest; or
- (C) A combination of partial assignee(s), and inventor(s) who have not assigned their right, title and interest.

Each individual inventor may only assign the interest he or she holds; thus, assignment by one joint inventor renders the assignee a partial assignee. A partial assignee likewise may only assign the interest it holds; thus, assignment by a partial assignee renders a subsequent assignee a partial assignee. All parties having any portion of the ownership in the patent property must act together as a composite entity in patent matters before the Office.

V. MAKING THE ASSIGNMENT OF RECORD

An assignment can be made of record in the United States Patent and Trademark Office (Office) in two different ways, for two different purposes. The differences are important to note:

- (A) An assignment can be made of record in the assignment records of the Office as provided for in [37 CFR Part 3](#) ([mpep-9020-appx-r.html#d0e336097](#)). Recordation of the assignment provides legal notice to the public of the assignment. It should be noted that recording of the assignment is merely a ministerial act; it is not an Office determination of the validity of the assignment document or the effect of the assignment document on the ownership of the patent property. See [37 CFR 3.54](#) ([mpep-9020-appx-r.html#d0e336007](#)), [MPEP § 317.03](#) ([s317.html#d0e19499](#)), and *Realvirt, LLC v. Lee*, 195 F.Supp.3d 847, 862-3 (E.D. Va. 2016). For a patent to issue to an assignee, the assignment must have been recorded or filed for recordation in accordance with [37 CFR 3.11](#) ([mpep-9020-appx-r.html#d0e336150](#)). See [37 CFR 3.81\(a\)](#) ([mpep-9020-appx-r.html#d0e336811](#)).
- (B) An assignment can be made of record in the file of a patent application, patent, or other patent proceeding (e.g., reexamination proceeding). This step may be necessary to permit the assignee to "take action" in the application, patent, or other patent proceeding under the conditions set forth in [37 CFR 1.46](#) ([mpep-9020-appx-r.html#aia_d0e317867](#)) and [37 CFR 3.81\(a\)](#) ([mpep-9020-appx-r.html#d0e336811](#)), and [MPEP § 325](#) ([s325.html#ch300_d1fdcf_1b3e0_2e5](#)) (for applications filed on or after September 16, 2012) or under the conditions set forth in [pre-AIA 37 CFR 3.73](#) ([mpep-9020-appx-r.html#d0e336732](#)) and [MPEP § 324](#) ([s324.html#d0e19816](#)) (for applications filed before September 16, 2012). Recordation of an assignment in the assignment records of the Office does not, by itself, permit the assignee to take action in the application, patent, or other patent proceeding.

Additionally, for applications filed under [35 U.S.C. 111\(a\)](#) ([mpep-9015-appx-l.html#pltd0e302678aia](#)), [363](#) ([mpep-9015-appx-l.html#d0e306994313](#)), or [385](#) ([mpep-9015-appx-l.html#aia_d225a2_27b50_35n](#)) on or after September 16, 2012, an assignment may contain the statements required to be made in an oath or declaration ("assignment-statement"), and if the assignment is made of record in the assignment records of the Office, then the assignment may be utilized as the oath or declaration. See [35 U.S.C. 115\(e\)](#) ([mpep-9015-appx-l.html#aia_d1d85b_2aac5_3e0](#)), [37 CFR 1.63\(e\)](#) ([mpep-9020-appx-r.html#aia_d0e319917](#)), and [MPEP §§ 302.07](#) ([s302.html#d0e18281](#)), [317](#) ([s317.html#d0e19426](#)), and [MPEP § 602.01\(a\)](#) ([s602.html#ch600_d1f64_29e5e_a0](#)).

301.01 Accessibility of Assignment Records [R-10.2019]**37 CFR 1.12 Assignment records open to public inspection.**

- (a)
 - (1) Separate assignment records are maintained in the United States Patent and Trademark Office for patents and trademarks. The assignment records, relating to original or reissue patents, including digests and indexes (for assignments recorded on or after May 1, 1957), and published patent applications are open to public inspection at the United States Patent and Trademark Office, and copies of patent assignment records may be obtained upon

6/24/24, 5:22 PM

301-Ownership/Assignability of Patents and Applications

request and payment of the fee set forth in § 1.19 (mpep-9020-appx-r.html#d0e315991) of this chapter. See § 2.200 of this chapter regarding trademark assignment records.

- (2) All records of assignments of patents recorded before May 1, 1957, are maintained by the National Archives and Records Administration (NARA). The records are open to public inspection. Certified and uncertified copies of those assignment records are provided by NARA upon request and payment of the fees required by NARA.
- (b) Assignment records, digests, and indexes relating to any pending or abandoned patent application, which is open to the public pursuant to § 1.11 (mpep-9020-appx-r.html#d0e314104), or for which copies or access may be supplied pursuant to § 1.14 (mpep-9020-appx-r.html#d0e314245), are available to the public. Copies of any assignment records, digests, and indexes that are not available to the public shall be obtainable only upon written authority of an inventor, the applicant, the assignee or an assignee of an undivided part interest, or a patent practitioner of record, or upon a showing that the person seeking such information is a bona fide prospective or actual purchaser, mortgagee, or licensee of such application, unless it shall be necessary to the proper conduct of business before the Office or as provided in this part.
- (c) Any request by a member of the public seeking copies of any assignment records of any pending or abandoned patent application preserved in confidence under § 1.14 (mpep-9020-appx-r.html#d0e314245), or any information with respect thereto, must:
 - (1) Be in the form of a petition including the fee set forth in § 1.17(g) (mpep-9020-appx-r.html#d0e315397); or
 - (2) Include written authority granting access to the member of the public to the particular assignment records from an inventor, the applicant, the assignee or an assignee of an undivided part interest, or a patent practitioner of record.
- (d) An order for a copy of an assignment or other document should identify the reel and frame number where the assignment or document is recorded. If a document is identified without specifying its correct reel and frame, an extra charge as set forth in § 1.21(j) (mpep-9020-appx-r.html#d0e316474) will be made for the time consumed in making a search for such assignment.

Assignment documents relating to patents, published patent applications, registrations of trademarks, and applications for registration of trademarks are open to public inspection. Records related to assignments of patents, and patent applications that have been published as patent application publications are available on the USPTO website. Images of assignment documents recorded June 1998 and later are also viewable on the Office website. To view images of earlier-recorded assignment documents, members of the public must place an order pursuant to 37 CFR 1.12(d) (mpep-9020-appx-r.html#d0e314168).

The Office will not open only certain parts of an assignment document to public inspection. If such a document contains two or more items, any one of which, if alone, would be open to such inspection, then the entire document will be open. Thus, if a document covers either a trademark or a patent in addition to one or more patent applications, it will be available to the public *ab initio*; and if it covers a number of patent applications, it will be so available as soon as any one of them is published or patented. Documents relating only to one or more pending applications for patent which have not been published under 35 U.S.C. 122(b) (mpep-9015-appx-l.html#d0e303054) will not be open to public inspection.

Copies of assignment records relating to pending or abandoned patent applications which are open to the public pursuant to 37 CFR 1.11 (mpep-9020-appx-r.html#d0e314104) or for which copies or access may be supplied pursuant to 37 CFR 1.14 (mpep-9020-appx-r.html#d0e314245) are available to the public. For pending or abandoned applications which are not open to the public pursuant to 37 CFR 1.11 (mpep-9020-appx-r.html#d0e314104) or for which copies or access may not be supplied pursuant to 37 CFR 1.14 (mpep-9020-appx-r.html#d0e314245), information related thereto is only obtainable upon a proper showing of written authority. For applications filed on or after September 16, 2012, the written authority must be from (A) an inventor, (B) an applicant, (C) the assignee or an assignee of an undivided part interest, (D) a patent practitioner of record, or (E) a person with written authority from (A), (B), or (C) or (D). See 37 CFR 1.12 (mpep-9020-appx-r.html#d0e314168). For applications filed prior to September 16, 2012, the written authority must be from the applicant or applicant's assignee or from the attorney or agent of either, or upon a showing that the person seeking such information is a bona fide prospective or actual purchaser, mortgagee, or licensee of such application. See pro-AIA 37 CFR 1.12 (mpep-9020-appx-r.html#d0e314168).

If the application on which a patent was granted is a division, continuation, or continuation-in-part of an earlier application, the assignment records of that earlier application will be open to public inspection because copies or access may be supplied to the earlier application pursuant to 37 CFR 1.14 (mpep-9020-appx-r.html#d0e314245).

Assignment records relating to reissue applications are open to public inspection because reissue applications are open to public inspection pursuant to 37 CFR 1.11(b) (mpep-9020-appx-r.html#d0e314104).

Requests for abstracts of title for assignments of patents recorded after May 1, 1957, are provided by the Certification Division upon request and payment of fee required in 37 CFR 1.19 (mpep-9020-appx-r.html#d0e315991). Requests for copies of pre-1957 records for patents should be directed to the National Archives and Records Administration (NARA). Since these records are maintained by NARA, it is more expeditious to request copies directly from NARA, rather than from the Office, which would then have to route the requests to NARA. Payment of the fees required by NARA should accompany all requests for copies.

All assignment records from 1837 to April 30, 1957 for patents are now maintained and are open for public inspection in the National Archives Research Room located at the Washington National Records Center Building, 4205 Suitland Road, Suitland, Maryland 20746 and at the Civilian Records Division of the National Archives at College Park, 8601 Adelphi Road, College Park, MD 20740-6001. Assignment records from before 1837 are not available. Individuals should check the National Archives website, www.archives.gov (<https://www.archives.gov>), for how to obtain information from these locations.

[(qq)](#qq)

PEDRO N. IBANEZ, INVENTOR

USNAVY (RET)

29915 MIRA LOMA DR. UNIT 29

TEMECULA CA 92592

SUBJ: US PATENT OFFICE PATENT APPLICATIONS

16/598965 17/322938 18/518994

16/859711 18/761178

Attachment:

1. Declaration of Mr. Paul Browning, Chairman of Board, Mitsubishi Power
2. Declaration of Atty. William McCarthy, General Counsel Mitsubishi Power Americas

GREETINGS: MS. JANISSE QUINONES, CEO

LOS ANGELES DEPT. OF WATER AND POWER

919 S. SOTO ST. LOS ANGELES CA. 90023

THIS IS A LETTER OF CLAIM AND WARNING TO CEASE AND DESIST ALL POWER PLANT OPERATIONS THAT CLOSELY RESEMBLE CLAIMS IN ABOVE US PATENT OFFICE APPLICATIONS.

UNDER 35 USC 261, INVENTOR HAS THE RIGHT TO ASSIGN PATENT APPLICATIONS, EVEN BEFORE PATENT IS GRANTED.

THE ABOVE PATENT APPLICATIONS ORIGINATED THE USE OF ELECTROLYSIS TOGETHER WITH STEAM BOILERS IN THE PRODUCTION OF COMMERCIAL ELECTRICITY AND COMMERCIAL WATER, USING DESALINATION AND DISTILLATION FILE DATED RETROACTIVE OCTOBER 10, 2019.

EXH 5-1

IF YOU DO NOT COMPLY TO CEASE AND DESIST, YOU MAY BE PART OF A COMPLAINT SOON TO BE FILED AT THE US DISTRICT COURT, NORTHER DISTRICT OF CALIFORNIA.

RESPECTFULLY,



7-08-2024

PEDRO N. IBANEZ, INVENTOR

EXH 5-2

1 Callie A. Bjurstrom (SBN 137816)
PILLSBURY WINTHROP SHAW PITTMAN LLP
2 501 West Broadway, Suite 1100
San Diego, CA 92101-3575
3 Telephone: 619.234.5000
Facsimile: 619.236.1995
4 callie.bjurstrom@pillsburylaw.com

5 Evan Finkel (SBN 100673)
Jeffrey D. Wexler (SBN 132256)
6 Michael R. Kreiner (SBN 316625)
PILLSBURY WINTHROP SHAW PITTMAN LLP
7 725 South Figueroa Street, Suite 2800
Los Angeles, CA 90017-5406
8 Telephone: 213.488.7100
Facsimile: 213.629.1033
9 evan.finkel@pillsburylaw.com
jeffrey.wexler@pillsburylaw.com
10 michael.kreiner@pillsburylaw.com

11 Attorneys for Defendants Mitsubishi Power
Americas, Inc. and Paul Browning

12
13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **EASTERN DIVISION**

16 PEDRO N. IBANEZ,
17 Plaintiff,
18 vs.
19 MITSUBISHI POWER AMERICAS,
INC.; MR. PAUL BROWNING, CEO,
20 Defendants.
21
22
23
24

Case No. 5:21-cv-00067-JGB (SHKx)

**DECLARATION OF WILLIAM
McCARTHY IN SUPPORT OF
DEFENDANTS' MOTION: (1) TO
DISMISS COMPLAINT FOR
FAILURE TO STATE A CLAIM
[Fed. R. Civ. P. 12(b)(6)]; (2) TO
DISMISS COMPLAINT BASED
UPON IMPROPER VENUE [Fed. R.
Civ. P. 12(b)(3)]; AND (3) TO
DISMISS COMPLAINT AS
AGAINST DEFENDANT PAUL
BROWNING BASED UPON LACK
OF PERSONAL JURISDICTION
[Fed. R. Civ. P. 12(b)(2)]**

Date: April 5, 2021
Time: 9:00 a.m.
Courtroom: 1 [Riverside Courthouse]

EXIT 6-1

DECLARATION OF WILLIAM McCARTHY

I, William McCarthy, declare:

1. I am a resident of Longwood, Florida. I am an attorney licensed to practice law in the state of New Jersey, and I am an Authorized Florida House Counsel (*i.e.*, an attorney who is certified to perform limited legal services for a business organization in Florida). I am General Counsel of Mitsubishi Power Americas, Inc. (“MPA”), a party to this action. I submit this declaration in support of the motion of MPA and Paul Browning pursuant to Fed. R. Civ. P. 12(b)(2), 12(b)(3), and 12(b)(6) to dismiss the Complaint filed by plaintiff Pedro N. Ibanez. Unless indicated otherwise, I have personal knowledge of the following facts, and if called as a witness I could and would testify competently to those facts.

2. MPA is headquartered in Lake Mary, Florida.

3. MPA does not have any offices in California.

4. MPA does not have any green hydrogen projects in California.

5. In May 2019, MPA established an initiative with Magnum Development, the owner of an underground salt dome in Millard County, Utah, to develop the Advanced Clean Energy Storage project to store renewable energy as hydrogen gas for provision to power markets in the western United States.

6. In March 2020, MPA entered into a contract to supply hydrogen-capable gas turbines to the Intermountain Power Plant in Millard County, Utah; that project, scheduled to be complete in 2025, will convert the plant from coal-fired to a mixture

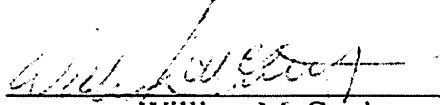
7-14 6-2

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

of natural gas and “green” hydrogen gas. That plant is operated by the Los Angeles Department of Water & Power.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 25th day of February, 2021, at Longwood, Florida.



William McCarthy

EXH 6-3

1 Callie A. Bjurstrom (SBN 137816)
PILLSBURY WINTHROP SHAW PITTMAN LLP
2 501 West Broadway, Suite 1100
San Diego, CA 92101-3575
3 Telephone: 619.234.5000
Facsimile: 619.236.1995
4 callie.bjurstrom@pillsburylaw.com

5 Evan Finkel (SBN 100673)
Jeffrey D. Wexler (SBN 132256)
6 Michael R. Kreiner (SBN 316625)
PILLSBURY WINTHROP SHAW PITTMAN LLP
7 725 South Figueroa Street, Suite 2800
Los Angeles, CA 90017-5406
8 Telephone: 213.488.7100
Facsimile: 213.629.1033
9 evan.finkel@pillsburylaw.com
jeffrey.wexler@pillsburylaw.com
10 michael.kreiner@pillsburylaw.com

11 Attorneys for Defendants Mitsubishi Power
Americas, Inc. and Paul Browning
12

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **EASTERN DIVISION**

16 PEDRO N. IBANEZ,
17 Plaintiff,
18 vs.
19 MITSUBISHI POWER AMERICAS,
INC.; MR. PAUL BROWNING, CEO,
20 Defendants.
21

Case No. 5:21-cv-00067-JGB (SHKx)

**DECLARATION OF PAUL
BROWNING IN SUPPORT OF
DEFENDANTS' MOTION: (1) TO
DISMISS COMPLAINT FOR
FAILURE TO STATE A CLAIM
[Fed. R. Civ. P. 12(b)(6)]; (2) TO
DISMISS COMPLAINT BASED
UPON IMPROPER VENUE [Fed. R.
Civ. P. 12(b)(3)]; AND (3) TO
DISMISS COMPLAINT AS
AGAINST DEFENDANT PAUL
BROWNING BASED UPON LACK
OF PERSONAL JURISDICTION
[Fed. R. Civ. P. 12(b)(2)]**

Date: April 5, 2021
Time: 9:00 a.m.
Courtroom: 1 [Riverside Courthouse]

EXIT Ce-4

DECLARATION OF PAUL BROWNING

I, Paul Browning, declare:

1. I am a resident of Longwood, Florida. I am a named defendant in this action. Since April 2016, I have been President & Chief Executive Officer of Mitsubishi Power Americas, Inc. ("MPA"), the other defendant to this action. I submit this declaration in support of the motion filed by MPA and me pursuant to Fed. R. Civ. P. 12(b)(2), 12(b)(3), and 12(b)(6) to dismiss the Complaint filed by plaintiff Pedro N. Ibanez. Unless indicated otherwise, I have personal knowledge of the following facts, and if called as a witness I could and would testify competently to those facts.

2. Since April 1, 2016, my office is located at MPA's headquarters in Lake Mary, Florida.

3. Since March 21, 2016, my primary residence has been in Longwood, Florida. I own a condominium as vacation property in San Diego, California.

4. I undertake business activities only through and on behalf of MPA, and not as an individual.

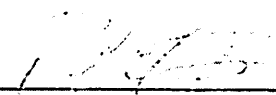
5. MPA does not currently have any hydrogen projects in California. MPA has entered into a contract to supply hydrogen-capable gas turbines to the Intermountain Power Plant project in Millard County, Utah, and the Capital Power Project in Alberta, Canada. I was not involved in contract negotiations, but I did review the major points of MPA's proposal for those projects, and I presented those points to my manager in Japan to receive his approval before MPA submitted the proposal to Intermountain Power Authority and Capital Power.

EXH 6-5

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 24th day of February, 2021, at Lake Mary, Florida.



Paul Browning

EXH 6-6