

OPINION UNDER SECTION 74A

Patent	GB2422170
Proprietor(s)	David Lindsay Edwards
Exclusive Licensee	
Requester	David Lindsay Edwards
Observer(s)	Equinor ASA
Date Opinion issued	30 September 2021

The request

1. The comptroller has been requested to issue an opinion as to whether the patent GB2422170 would be infringed by actions of Equinor UK based on evidence from two YouTube videos and an article on the JPT journal website :
 - A. <https://www.youtube.com/watch?v=4b3R1vWN3F0> “*Equinor - World's first subsea drone to transport CO2*” - 15 June 2020 – 1 minute 32 seconds
 - B. <https://www.youtube.com/watch?v=R121no8SvTo> “*Society of Petroleum Engineers - Subsea Shuttle Concept Brings CO2 to Subsea Reservoirs*” - 17 June 2020 – 42 seconds
 - C. <http://pubs.spe.org/en/jpt/jpt-article-detail/?art=7199> “*Shuttle Concept Brings CO2 to Subsea Reservoirs*” – June 15, 2020

Observations

2. Observations were received on behalf of Equinor UK Ltd from Equinor ASA. They noted that the evidence reflects a ‘concept’ and that no device yet exists, and thus no potentially infringing acts have occurred. I note that once an opinion request is advertised, anyone is free to make observations on it in the following 4-week period.
3. Observations in reply were received from the proprietor.

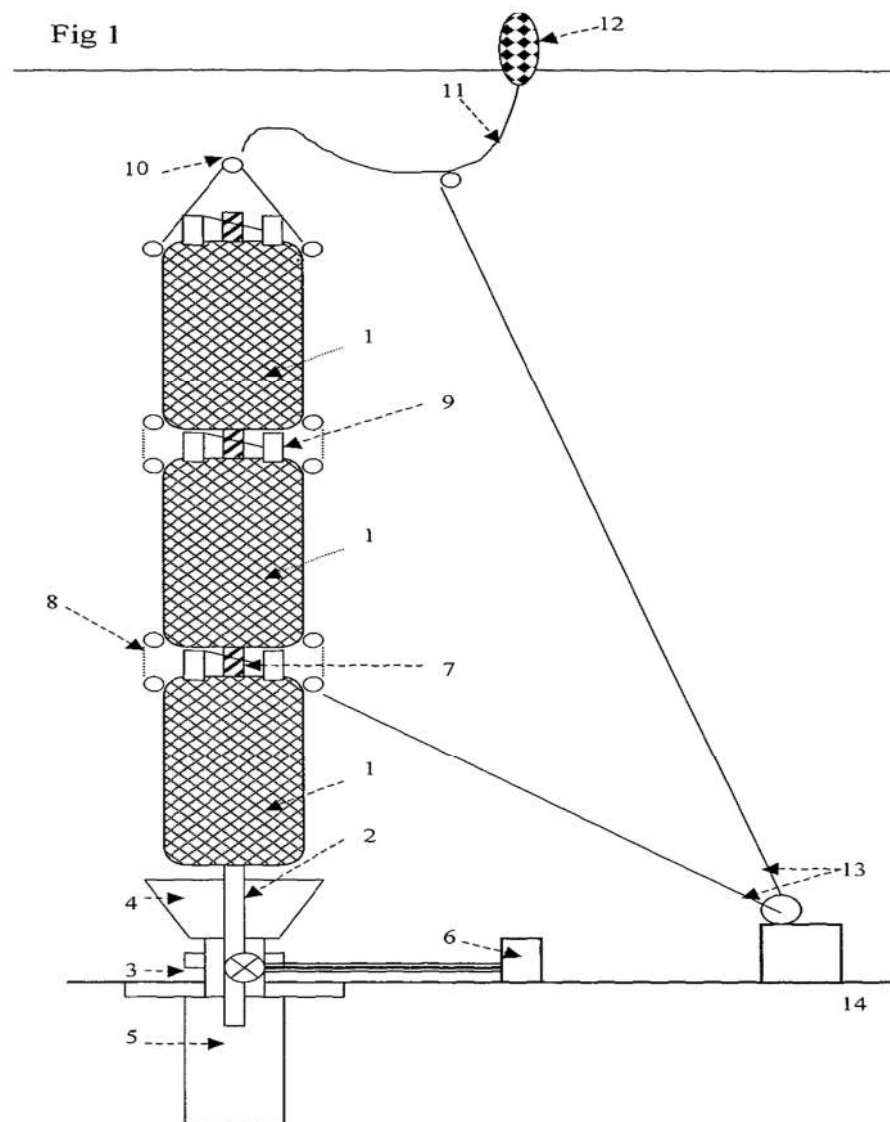
Matters to be considered by this Opinion

4. I am not barred from issuing my opinion on a potential infringement. This is clear from Section 74A(1)(a) of the Patents Act 1977 (the Act) which states:

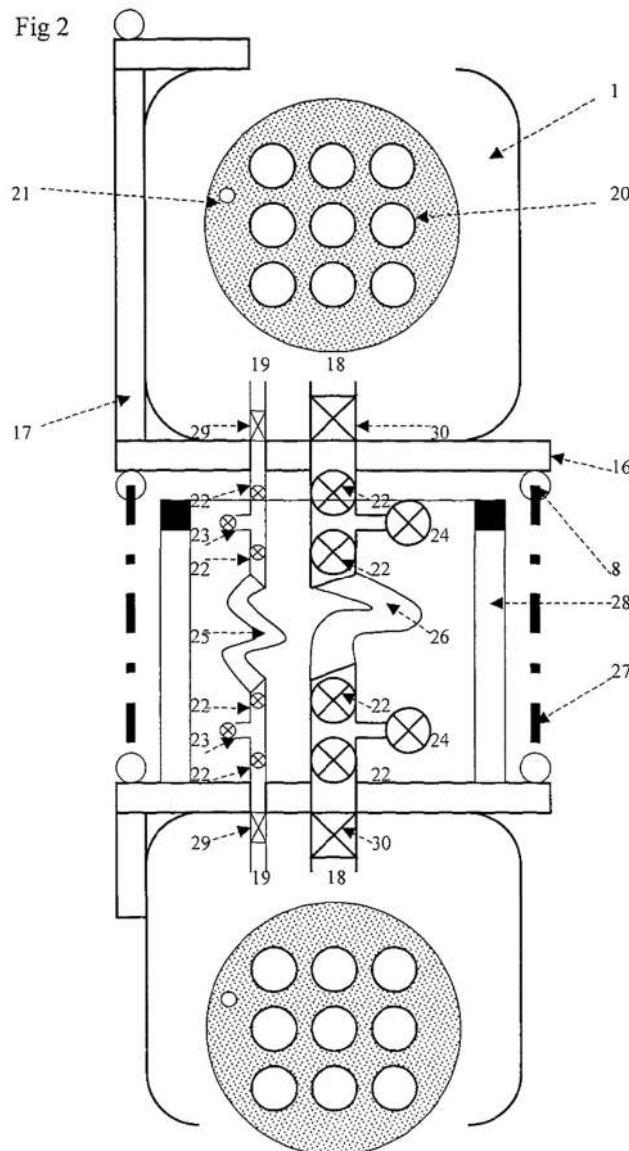
The proprietor of a patent or any other person may request the comptroller to issue an opinion –
(a) as to whether a particular act constitutes, or (if done) would constitute, an infringement of the patent;

The Patent

5. The invention is a subsea tank system for moving hydrocarbons from a subsea oil well to the sea surface. The embodiment in figure 1 below shows how three interconnected tanks 1 are docked to a seabed anchor 3 that is connected to a hydrocarbon well via conduit 6. The anchor is said to be '*...permanently grouted 5 to the seabed.*'. A stinger 2 docks to the anchor 3 via a guide funnel 4. The tanks are fluidly linked at each end via hoses 7 and mechanically linked by tension chains 8 and compression cages 9. The chains and cages act to protect the hose whilst seemingly allowing some movement between tanks. Tethers 13 and a surface marker buoy 12 are shown. The tanks are said to be '*allowed to float vertically.*'



6. The tanks are described as modular units and '*not primarily load-bearing structures*'. Figure 2 below shows detail of how the tanks are connected as a side view, whilst the tanks themselves are said to be '*illustrated in cross section*'.



7. It is said that '*structural continuity*' is provided for the tanks by steel base plates 16 connected to longitudinal struts 17, with a similar arrangement at both ends of the tank. Chains 27 and cages 28 correspond to parts 8 and 7 in figure 1. Figure 2 shows an arrangement of a main hydrocarbon conduit 18 linking the tanks and a gas conduit 19 that passes through the tank but '*does not serve any storage purposes*'. It is said that '*The gas conduit may be utilised to recharge the hydraulic units of the anchor station.*'. It seems that parts 20 and 21 are a cross-sectional view and show one option of a tank comprising multiple parallel charges said to be '*constructed from standard high- pressure oil-field casing*'. These charges are linked at each end by branching to the conduit 18. It is further stated that '*Additionally the storage charges (20) may be fitted with baffles to aid and/or facilitate separation of oil and gas and to collect any produced sand and minor debris.*'.
8. In use, the system operates with the modular tanks being towed by a ship to the

position of the well anchor. The empty tanks are allowed to sink towards the anchor, the negative buoyancy possibly provided by the tanks having air inside removed. The stinger unit is directed into the anchor which grabs hold of the stinger using hydraulic rams. Hydrocarbons, expected to constitute both liquid and gas, then flow to the tanks. Once filled, the stinger is released and the tanks are allowed to float to the surface with the hydrocarbon contents expected to provide positive buoyancy. It is said that '*At surface, a replacement series of tanks may be connected to the (primary) stab-in element and subsequently re-positioned. The remainder may be conjoined and towed to market.*' It is also said that '*Modularity allows for the processing, measurement, and storage of hydrocarbons from a wide variety of both offshore (i.e. hazard and water-depth related) and hydrocarbon reservoir conditions.*'

Claim construction

9. Before I can consider whether the patent is infringed, I must first construe the claims. This means I must interpret the claims in the light of the description and drawings as instructed by Section 125(1) and I must also take account of the Protocol on the Interpretation of Article 69 of the European Patent Convention (EPC) as required by section 125(3). In doing so I must interpret the claims in context through the eyes of the person skilled in the art. Simply put, I must give the claims a “purposive” (or “normal”) interpretation¹ by asking what the person skilled in the art would have understood the language of the claim used by the patentee to mean.
10. Section 125(1) of the Act states that:

For the purposes of this Act an invention for a patent for which an application has been made or for which a patent has been granted shall, unless the context otherwise requires, be taken to be that specified in a claim of the specification of the application or patent, as the case may be, as interpreted by the description and any drawings contained in that specification, and the extent of the protection conferred by a patent or application for a patent shall be determined accordingly.

and the Protocol on the Interpretation of Article 69 EPC states that:

Article 69 should not be interpreted in the sense that the extent of the protection conferred by a European patent is to be understood as that defined by the strict, literal meaning of the wording used in the claims, the description and drawings being employed only for the purpose of resolving an ambiguity found in the claims. Neither should it be interpreted in the sense that the claims serve only as a guideline and that the actual protection conferred may extend to what, from a consideration of the description and drawings by a person skilled in the art, the patentee has contemplated. On the contrary, it is to be interpreted as defining a position between these extremes which combines a fair protection for the patentee with a reasonable degree of certainty for third parties.

¹ In *Generics UK Ltd (t/a Mylan) v Yeda* [2017] EWHC 2629 (Pat), Arnold J (as he then was) confirmed (at [134]-[138]) the continuing requirement to interpret patent specifications purposively, having considered the earlier judgment of the UK Supreme Court in *Actavis v Eli Lilly* [2017] UKSC 48. Arnold J's conclusion was approved by Lord Kitchin in *Icescape Ltd v. Ice-World International BV* [2018] EHC Civ 2219 (at [60]).

11. There are 11 claims and the request argues that all of them are infringed.

Claims 1, 2-7

12. Independent claim 1 has dependant claims 2 to 7, and it reads:

1. *A hydrocarbon collection system comprising:*

an anchor station designed to be positioned on a sea-bed and to receive hydrocarbons from a sub-sea well; and

a submersible modular collection unit comprising interlinked tank units, means for docking to the anchor station to collect liquid and gaseous hydrocarbons from the sub-sea well and means for removing from the collection unit, gases that have separated from liquids; the collection unit being designed so that when filled with hydrocarbons it can be detached from the anchor station, allowed to rise towards the sea surface and towed away.

13. Dependant claims 2 to 4 and 7 have more detail of the anchor and docking means, while claims 5 and 6 have more detail of a means to remove gas.

14. Firstly, it is said that the unit is able to dock and detach from the anchor, and thus I construe the anchor station to be implicitly required to have means that are suitable for docking and detaching the unit. Also, the anchor station implicitly must be able to deliver hydrocarbons to the collection unit.

15. The final three lines are a definition by the result to be achieved. The embodiment does describe how the hydrocarbon filled collection unit maybe arranged to be positively buoyant and thus I construe these last lines to mean that the collection unit is able to achieve positive buoyancy when filled.

16. Looking at the embodiment, it is clear that the anchor not only acts as a fluid port, but also acts to hold and physically anchor the collection unit, especially as the anchor is said to be '*permanently grouted 5 to the seabed*' and the collection unit may become positively buoyant as it is filled. As the claim also says that the collection unit is '*allowed to rise*' when detached from the anchor station, I construe the term 'anchor station' as also providing a physical anchor for the collection unit. Thus, it follows that the term 'means for docking' is construed to provide both a fluid connection and a mechanical anchoring connection.

17. In the request and the observations in reply, the requestor seems to view the anchor station of the claim more broadly as only being required to provide a fluid connection. While the claim explicitly refers to hydrocarbon transfer only, for the reasons I have given above, it is my opinion that the anchor station must be more than just a fluid connection. The anchor station also provides an anchor for holding the collection unit to the seabed.

18. Secondly, I need to construe the words '*modular*' and '*interlinked*' in the phrase '*a submersible modular collection unit comprising interlinked tank units*'. In the embodiment disclosed in figure 1 and 2 of the patent, the tanks are shown to be

linked in a chain, end-to-end, with both a mechanical link and a fluid link between the tanks so that hydrocarbons can flow from one tank to the next..

19. There is little in the claim that clearly defines the arrangement of the tanks. I do not see the word 'modular' of itself as suggesting a particular arrangement. Nor does the word 'interlinked' of itself suggest a particular arrangement. I note that the description does refer to '*... a modular series of submersible tanks ...*' and '*... the individual modular units of the series of production tanks ...*'. Claim 1 does not include the word 'series' and I note that it is only later dependant claim 6 which specifies '*...the tank units form a chain...*'.
20. In the request there is a section 'modularity' which seems to suggest that the invention might be read as having one or more tanks. I consider that to be incorrect as Claim 1 clearly refers to tanks in the plural and that they are linked. This excludes the invention of claim 1 from comprising only a single tank.
21. It is clear that the tanks are able to be linked together. It is difficult to determine what other limitation the use of 'modular' in the description will imply on to claim 1. It seems that the tanks of the embodiment are similar in size, shape and have matching connection means, though at least one tank is different in that it carries the stinger for docking to the anchor station. The claim however makes no mention of the tank's shape or size, nor that they should be self-similar. It does however seem that the interlinked tanks are expected to be able to act together as a whole and not be isolated.
22. Thus, I construe the claim broadly to not be limited to a set of self-similar tanks, nor be limited to a series chain arrangement. Further, I do not think that the claim implies that each tank has to have fluid ports at opposite ends. As a result, I do not think 'modular' should be read as implying the tanks have the specific mechanical features of the embodiment. Thus, I construe the claim broadly to cover any arrangement of linked tanks that can act as a whole.
23. The phrase '*means for removing from the collection unit, gases that have separated from liquids*' is more straightforward. The request has a section called 'separation' which notes that when mixed hydrocarbons enter a tank, if the pressure of the stored hydrocarbons is thus reduced, then gas will tend to separate out from liquid. I do not think this phrase implies that the claim includes a specific feature to facilitate separation, merely that any gas in the tank can be removed by such 'means'. I note that dependant claims 5 and 6 given more detail of what the removal means might be, thus supporting my view that claim 1 should be construed more broadly. As a result, I construe the phrase '*means for removing from the collection unit, gases that have separated from liquids*' broadly to mean any means suitable for removing gas from the tanks.
24. The requestor and observer both put some weight on the idea of towing as a possible distinctive feature. Claim 1 requires that the collection unit is designed so that it can be '*...allowed to rise towards the sea surface and towed away.*' The description does not say what features might be required to facilitate this, merely stating that the collection unit is to be towed. I construe this part of the claim broadly to mean that the unit, once it is positively buoyant, can be towed.

Claim 8

25. Claim 8 is problematic to construe, it reads :

8. *A tank unit that is configured and arranged to be coupled to and interlinked with like tank units to form a submersible modular collection unit for a system according to any preceding claim.*

26. Firstly, the claim must be read as not requiring all the features of the collection unit of claim 1, but instead has a scope that covers any one tank of the set used in the unit. Therefore, the tank does not have to have docking means or gas removal means. As with claim 1, I consider that both a mechanical link and a fluid link is meant by '*coupled to and interlinked with*'. Secondly, I note that this claim refers to linking '*like tanks units*' which is different wording to claim 1 which just refers to interlinked tanks. Therefore, the tank of claim 8 is one able to be used in a set of self-similar tanks.

27. The problem I face is deciding what features of the tank are needed to enable it to be linked; The key question is, does the claimed tank include the linking means such that they can be linked in a modular manner without additional equipment, or do the tanks merely need to be suitable for use with additional linking means ? If it is the latter, then the claim is very broad in scope.

28. I do not find that the phrase '*to form a submersible modular collection unit*' is enough for me to read the claim in a narrow manner. As the claim does not specify what linking features are to be included with the tank, I think it wrong to construe the tank narrowly to include the interlinking means.

29. As with claim 1, I do not find claim 8 must imply that the tanks have fluid ports at opposite ends or that they connect in a series chain. Thus claim 8 is construed to be a tank able to be linked with other such tanks, both mechanically and by fluid means, which would allow a set of tanks to act as a whole, where the tank is suitable for use in a subsea hydrocarbon collection system.

Claims 9-11

30. Claims 9 to 11 are more straightforward to construe. Claim 9 is dependent on claims 1-7 and claims 10 and 11 are omnibus claims. These claims read as follows:

9. *A submersible modular collection unit for a system according to any of Claims 1 to 7.*

10. *A system substantially as hereinbefore described with reference to the accompanying drawings.*

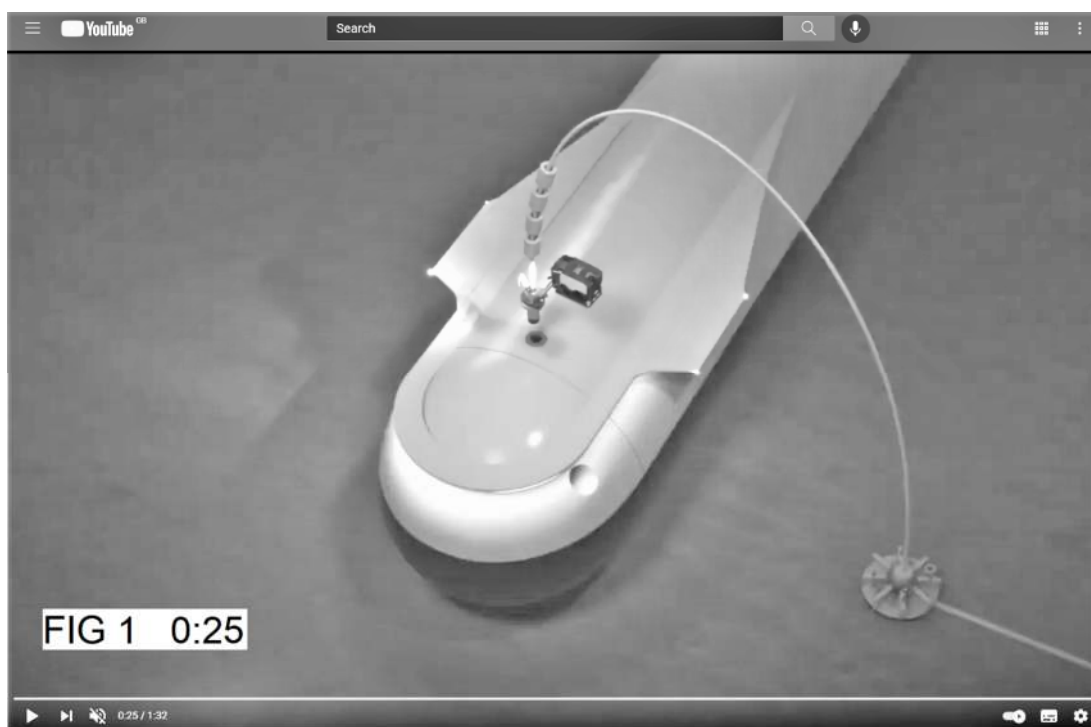
11. *A tank unit or a submersible modular collection unit, each being substantially as hereinbefore described.*

31. Claim 9 is slightly broader than claim 1 as it does not require the anchor station but I construe it to mean that the collection unit has to have means for docking that is suitable for use with an anchor station, the docking means able to provide fluid and mechanical connections.

32. Claims 10 and 11 are construed far more narrowly than claims 1, 8 or 9. They are taken to be limited to the set of specific features of the described embodiment.

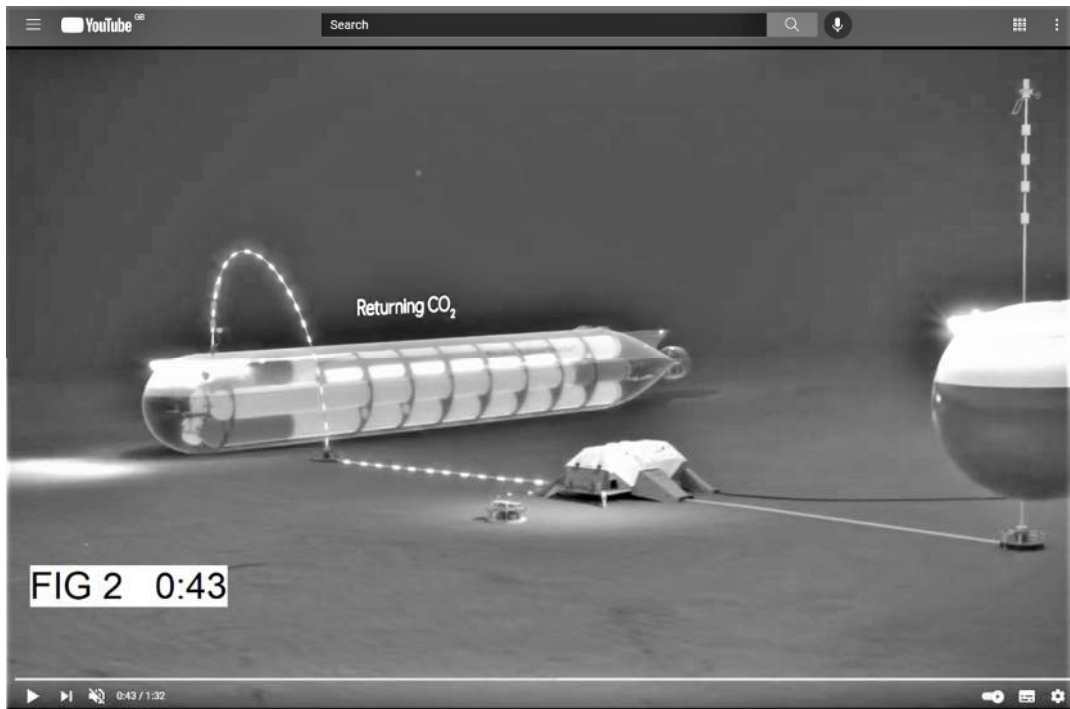
The EQUINOR evidence

33. The article C substantially describes what is shown by the videos and it includes a hyper-link to the video A. It appears that video B is an edited down version of video A, but with some added text. The videos show animated drawings, rather than photographs/film of a constructed device. The observer refers to this as a concept and, as noted above, they state that no device yet exists. What is disclosed is a powered submarine tanker 'shuttle' that can descend to sit on the sea floor adjacent a well-head, where a flowline is then attached between the shuttle and the well head. The article and videos state the primary aim of the tanker is to sequester carbon dioxide by moving it from the surface to the seabed so it can be injected into a subsea reservoir.
34. Video A refers to the shuttle as a 'drone', which I take to mean that it is unmanned, and states that it is powered by batteries. The flowline appears to be a flexible element that is fixed to a port on the top of the shuttle. Figure 1 below shows a first still from the video A (at 25 seconds) with the flowline connection being made by a smaller craft:

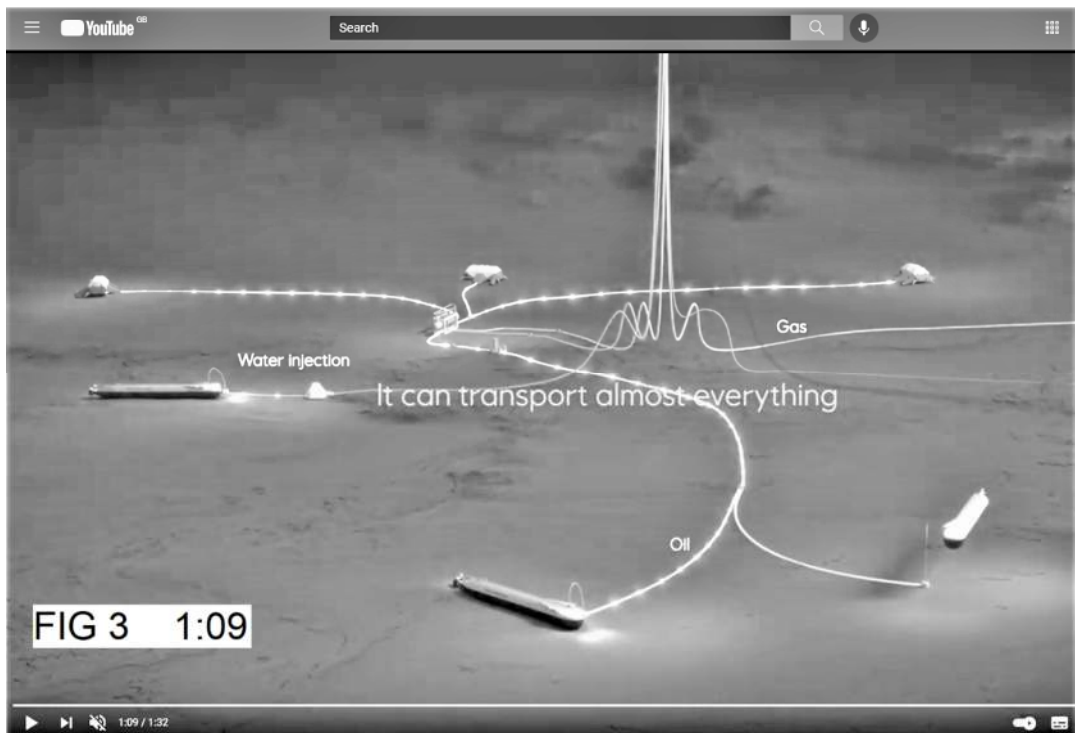


35. A second still from video A is shown in figure 2 below (at 43 seconds) where a transparent cutaway of the shuttle exterior shell reveals the interior with at least

seven tanks, the animation appearing to show that all these tanks are connected to the single flowline as the tanks empty together.



36. Whilst the primary use of the tanker is for delivering carbon dioxide, video A states that the shuttle can '*transport almost anything*' and the article states that oil could be transported away from the well. The video A has an animation of oil passing to a shuttle. This is shown in the third still from video A (at 1 minute 9 seconds) shown below in Figure 3:



37. Article C describes the configuration shown in two videos and has two images based on the videos. The article refers to :

'a fleet of electrically-powered submarines that will carry CO₂ to subsea injection sites autonomously'

And states that :

'In the computer animation, multiple shuttles are shown transiting to and from a subsea installation that also features resident underwater vehicles— itself an emerging but not fully realized concept. Instead of hovering or maintaining station, the large submersible units simply glide onto the seabed as the resident vehicle attaches a flowline for loading or offloading. Several tanks inside the shuttle hold the gas.'

38. The requestor in particular notes this passage in the article :

'Equinor has shared the concept so far only on its LinkedIn page where it said the idea was the result of a collaboration between an inventor and experts in IT, 3D printing, and CO₂ management.'

39. The request argues that this constitutes indirect infringement given that it relates to:

'... promotion ... as a form of selling, inducing in their manufacturing process greater industry and suppliers to infringe, promotion to UK investors, and seeking ongoing unwarranted goodwill with the stock exchange.'

40. In their observations, Equinor state that :

'...no actual device exists. Equinor has developed a concept for a subsea drone but has not produced one. It remains a concept. Consequently, no manufacture, importation, disposal, offer to dispose or any other act has occurred, whether in the United Kingdom or any other jurisdiction.'

With regard to videos A and B and article C, Equinor state that these :

'...refer to a concept not to any commercial activities.'

41. Given the evidence to hand, I accept that no potentially infringing acts have occurred either directly or indirectly.

42. I will now proceed to give my opinion on whether any such potential acts would infringe or not.

Infringement

43. Section 60 of the Act governs what constitutes infringement of a patent, the relevant parts of this section read as follows:

(1) Subject to the provision of this section, a person infringes a patent for an

invention if, but only if, while the patent is in force, he does any of the following things in the United Kingdom in relation to the invention without the consent of the proprietor of the patent, that is to say -

(a) where the invention is a product, he makes, disposes of, offers to dispose of, uses or imports the product or keeps it whether for disposal or otherwise;

(b) where the invention is a process, he uses the process or he offers it for use in the United Kingdom when he knows, or it is obvious to a reasonable person in the circumstances, that its use there without the consent of the proprietor would be an infringement of the patent;

(c) where the invention is a process, he disposes of, offers to dispose of, uses or imports any product obtained directly by means of that process or keeps any such product whether for disposal or otherwise.

(2) Subject to the following provisions of this section, a person (other than the proprietor of the patent) also infringes a patent for an invention if while the patent is in force and without the consent of the proprietor, he supplies or offers to supply in the United Kingdom a person other than a licensee or other person entitled to work the invention with any of the means, relating to an essential element of the invention, for putting the invention into effect when he knows, or it is obvious to a reasonable person in the circumstances, that those means are suitable for putting, and are intended to put, the invention into effect in the United Kingdom.

44. In the Supreme Court in *Actavis v Eli Lilly*² Lord Neuberger stated that the problem of infringement is best approached by addressing two issues, each of which is to be considered through the eyes of the notional addressee of the patent in suit, i.e. the person skilled in the relevant art. Those issues are:

(i) does the variant infringe any of the claims as a matter of normal interpretation; and, if not,

(ii) does the variant nonetheless infringe because it varies from the invention in a way or ways which is or are immaterial?

If the answer to either issue is “yes”, there is infringement; otherwise there is not.

45. The request refers to the ‘Doctrine of Equivalents’ when discussing the alleged infringement. In UK Law this is accounted for by considering variants of the features in a claim.

46. The Supreme Court in *Actavis* provided a reformulation of the three questions in *Improver*³ to provide assistance in determining whether a variant infringes or not. These reformulated questions are:

² *Actavis UK Limited and others v Eli Lilly and Company* [2017] UKSC 48

³ *Improver Corporation v Remington Consumer Products Ltd* [1990] FSR 181

(i) Notwithstanding that it is not within the literal meaning of the relevant claim(s) of the patent, does the variant achieve substantially the same result in substantially the same way as the invention, i.e. the inventive concept revealed by the patent?

(ii) Would it be obvious to the person skilled in the art, reading the patent at the priority date, but knowing the variant achieves substantially the same result as the invention, that it does so substantially the same way as the invention?

(iii) Would such a reader of the patent have concluded that the patentee nonetheless intended that strict compliance with the literal meaning of the relevant claim(s) of the patent was an essential requirement of the invention?

In order to establish infringement in a case where there is no literal infringement, a patentee would have to establish that the answer to the first two questions was “yes” and that the answer to the third question was “no”.

The invention of claims 1 and 10

47. Comparing the Equinor disclosure to the invention of claim 1, a key difference is evident to me: the invention uses an anchor station for both a mechanical and fluid connection, whilst the Equinor system does not. The Equinor system shows no mechanical anchoring taking place, the tanker instead just rests on the seabed. Whilst the connection in Equinor between the flowline and the tanker would need to be physically held together, this is not shown to act as an anchor for the tanker itself. Indeed, the flowline connection (see figure 1 above) is shown as attaching to the top of the shuttle in the Equinor system which is diametrically opposed to where one might reasonably expect an anchor for the tanker to be.
48. Thus, as a matter of normal (or purposive) interpretation, there would be no potential infringement of claim 1 by the Equinor system disclosed.
49. I now need to consider if this difference means the Equinor system varies in an immaterial way compared to the invention. The first *Improver* question is helpful here. The broad result required is for the tanker to remain in place at or near the seabed during a hydrocarbon filling operation. I consider that the Equinor system does not achieve this in substantially the same way as the invention, and thus there is a material difference such that Equinor would not infringe claim 1 as an equivalent.
50. As claim 1 would not be infringed, it follows that the dependant claims 2 to 7, which are thus narrower in scope, would also not be infringed. Similarly, claim 10, which again has a narrower scope than claim 1, would not be infringed.
51. As the Requestor went to some length to present arguments, I have given some consideration to one other feature of claim 1, which is ‘...*the collection unit ... can be detached from the anchor station, allowed to rise towards the sea surface and towed away.*’ In the observations Equinor argue that their concept is a ‘*self-propelled subsea drone*’ and does not show a ‘*collection unit designed to be towed away*’. The requestor appears to concede that ‘*The only real difference between the two*

devices, or systems, is that Edwards tows, Equinor pushes'. They also state that the Edwards device is moved across an ocean by *'its dedicated towing vehicle'*, whilst Equinor uses *'the battery-powered motor'* and thus propels itself. The requestor argues that towing of the collection unit and the self-contained powered thruster should be viewed as equivalents.

52. The embodiment of the invention is not shown to include any powered thrusters, instead tethers are shown connected to various tanks and a buoy is tethered to a 'crown shackle' at the end of the chain of tanks. The collection unit has attachment points which seems to make it suitable to be towed. However, the claim just requires that the collection unit *'can be ... towed away'*. Equinor clearly discloses the submarine as moving by battery powered thrusters. Nothing is shown in the Equinor video that suggests mechanical connection points for tow lines or similar. Thus, the difference between Equinor and this claimed feature is that no specific towing point is shown. I think that this is a distinguishing difference and that as a result it cannot be viewed as an immaterial variant. I do not find the evidence available to me enough to make me view a towable variant of Equinor concept as equivalent to this feature of the claim.

The invention of claim 9

53. As I explained above, claim 9 does not require the anchor station, but does require the collection unit to be able to dock to an anchor station with both a mechanical and fluid connection. A key difference again is that the Equinor tanker is shown not to have any docking feature that could provide mechanical anchoring for the tanker. As with claim 1, I find that this difference means that claim 9 would not be infringed as a matter of normal, purposive interpretation. Again, Equinor does not show an equivalent variation that would infringe claim 9.

The invention of claim 8

54. The first task here is deciding what type of tank unit is shown in the Equinor video. The 'A' video has an animation of a transparent-skinned tanker when it is offloading carbon dioxide to the subsea well. Close-up crops of stills at 46 and 51 seconds (Figure 4 and 5) are shown below as they seem to have the most detail available:



Fig 4 0:46

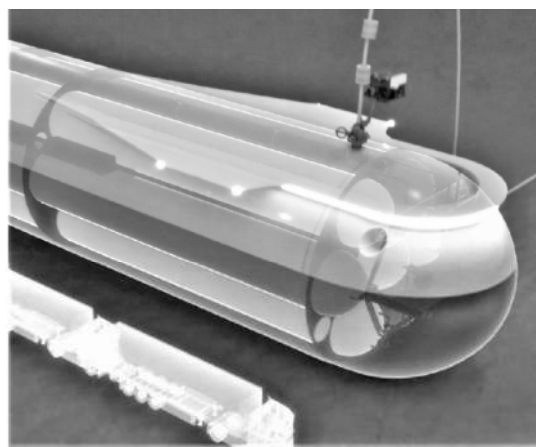


Fig 5 0:51

55. The request (in section 3) argues that both the inventive tanker and the Equinor shuttle *'consists internally of a bundle of casings aligned along the long axis of the tanker'*. Further in relation to claim 8 specifically it is argued (in section 6) that: *'Equinor brings a tank unit that is configured and arranged to be coupled to an interlinked like tank units internally to form a submersible collection unit.'*
56. In the observations, Equinor state: *'The Equinor concept does not disclose a modular system or units that form part of a modular system'*. In the observations in response, specifically to this statement, the requestor states: *'... externally, this is the case. However, it has been shown that Equinor elects to manifest a necessary tank 'modularity' internally ...'*
57. As I have said above, claim 8 is difficult to construe. My view is that the claim be read broadly to require tanks that are able to be linked together mechanically, but that no specific means for linking is implied. The tank also needs to allow a fluid link such that a set of interlinked tanks act together as a whole tank. It is my view that the modularity of claim 8 be construed broadly.
58. The Equinor disclosure is of a set of tanks, inside the submarine, that appear to be mechanically fixed together, at least by transverse internal spars or bulkheads. Thus, each tank is suitable to be linked with another tank, though indirectly. The tanks are of a similar shape and size. The set of tanks also appear to be fluidly linked so that they act together as a whole tank. The animation of the video shows all the tanks emptying of carbon dioxide together and at the same rate. It is reasonable to expect that the tanks would act to be filled together as well. It is not clear how the fluid link between the tanks is arranged and I do not think it possible to decide if the tanks are connected in a series chain or in parallel, or some other arrangement. The Equinor tanks must be viewed as suitable for use whilst underwater at the seabed to collect hydrocarbons.
59. A tank in Equinor is thus not distinguishable from the requirements of claim 8 and thus the invention of claim 8 would potentially be infringed by the Equinor disclosure. I do not therefore need to consider any equivalents.

Conclusion

60. It is my opinion, given the evidence available, that none of claims 1 to 7 and 9 to 11 would be infringed by the Equinor concept.
61. It is my opinion, given the evidence available, that claim 8 would be infringed by the tank arrangement shown by the Equinor concept.
62. There is no evidence before me of direct or indirect infringing acts having occurred in the UK.

Application for review

63. Under section 74B and rule 98, the proprietor may, within three months of the date of issue of this opinion, apply to the comptroller for a review of the opinion.

Gareth Lewis
Examiner

NOTE

This opinion is not based on the outcome of fully litigated proceedings. Rather, it is based on whatever material the persons requesting the opinion and filing observations have chosen to put before the Office.