

DECLARATION OF DAVID LORENZ

I, David Lorenz, affirm and declare as follows:

1. I am the Vice President of Operations at Kowalski Heat Treating (“Kowalski”), an ISO 9001:2008 Without Design certified company located in Cleveland, Ohio.

2. On January 15, 2016, I submitted a signed Certification for Rothwell, Figg, Ernst & Manbeck P.C. regarding a heat treatment process conducted on endodontic files by Kowalski. A copy of that Certification is attached to this declaration as Exhibit A.

3. I have been informed that an objection has been lodged against the signed Certification for lack of authentication.

4. Rothwell, Figg, Ernst & Manbeck P.C. retained Kowalski to conduct heat treatment on samples of endodontic files in accordance with a procedure described in an article by Kuhn *et al.*, *Journal of Endodontics* 2000, 28(10), 716-720.

5. Kowalski received endodontic files from Rothwell, Figg, Ernst & Manbeck P.C., which were identified by the packaging as ProFile .04 Taper, Nickel Titanium Rotary Instruments, Size 20, 25 mm, Part No. PIT042025. The endodontic files were annealed by immersing them in a molten salt bath at 752°F (400°C) ± 5°F for 10 minutes and subsequently water quenched at room temperature.

6. After heat treatment, the endodontic files were re-packaged and two packages of the files were sent to Knight Mechanical Testing in Fort Wayne, Indiana.


7. The information contained in the signed Certification attached as Exhibit A is true and correct.

GOLD STANDARD
SUBSTITUTE EXHIBIT 2051
US ENDODONTICS v. GOLD STANDARD

8. The signed Certification attached as Exhibit A was prepared in the course of the regularly conducted business of Kowalski, at the time the heat treatment was conducted, based on my personal knowledge.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 15, 2016

 VP OF OPERATIONS, METALLURGIST

David Lorenz, VP OF OPERATION
METALLURGIST

Exhibit A



Kowalski Heat Treating Company

A FAMILY BUSINESS FROM THE PAST AND FOR THE FUTURE

Certification

Today's Date

Friday, January 15, 2016

Prepared For:

ROTHWELL, FIGG, ERNST & MA

607 14th Street, N

WASHINGTON DC 20005

KHT Number: 261556

Order Date: 1/13/2016

Part Number: PIT042025

Purchase Order Number:

J Nolan

Cert Parameter: Process

Quantity: 24

Cert Description: Other

Weight: 1

Processed per the following specifications:

The above stated parts were annealed by immersing them in a molten salt bath at (400 C) 752 F +/- 5 F for 10 minutes and subsequently water quenched. Process instructions were supplied by Jason Nolan.

Inspection Results: Process Complete

Required Hardness: RC Actual: Process Complete

Number of pieces inspected: 0

Inspected by: dml

Approved by: 

Title: OPERATIONS VP

Date: Friday, January 15, 2016

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