

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

OXYGENATOR WATER
TECHNOLOGIES, INC.,

Civil File No. 20-cv-00358-ECT-HB

Plaintiff,

v.

TENNANT COMPANY,

Defendant.

**SUPPLEMENTAL DECLARATION OF CARA S. DONELS IN SUPPORT OF
TENNANT'S CLAIM CONSTRUCTION BRIEF**

I, Cara S. Donels, declare as follows:

1. I am an attorney licensed to practice in the State of Iowa. I practice with the law firm of Fredrikson & Byron P.A., which serves as counsel to Defendant Tennant Company. I have been admitted *Pro Hac Vice* on June 4, 2020, Doc. No. 20.
2. Attached as **Exhibit B** are true and accurate excerpts from the deposition transcript of Ralph White, Ph.D., taken on July 1, 2021.
3. Attached as **Exhibit C** is a true and accurate excerpt from Webster's Dictionary at p. 153.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: July 27, 2021

s/Cara S. Donels

Cara S. Donels