

**Subject:** Re: [Efs-web-L] To traverse or to not traverse a restriction requirement?  
**Date:** Tuesday, June 21, 2022 at 6:31:00 PM Central Daylight Time  
**From:** David Boundy via Efs-web  
**To:** for users of EFS-Web and patent practitioners generally  
**CC:** David Boundy  
**Attachments:** image002.png, image003.png, ATT00001.txt

Oh what the heck. It's just electrons. This one is more about election of species than restrictions, but it will help you think in the right direction. At the bottom are some examples.

There are seven grounds on which you can traverse a restriction or election of species. Six are useful, one ("not patentably distinct") is not -- it's a ground you **never** use.

**Foundation.** You must **fully** understand the difference between a statutory "restriction requirement" vs. a regulatory "election of species."

The PTO's only statutory authority is 35 U.S.C. § 121. That requires a showing of "independent and distinct," and then guidance adds a further requirement, "serious burden."

Restriction requirement	Election of Species
Two or more "independent and distinct" inventions are claimed in one application	Two or more patentably distinct species of a generic invention
Statutory—35 U.S.C. § 121, concern that a patent should cover one invention	Nonstatutory concerns for examiner loading—37 C.F.R. § 1.146
Always asks you to elect from among <i>claims</i>	Asks you to elect among <i>species</i> in the disclosure
Almost always asks you to elect between independent claims	Typically (though not necessarily) asks you to elect an dependent claims, or <i>Markush</i> species, under a common parent independent claim
	Requires mutually-exclusive species (MPEP § 806.04(f) overlap in scope
Nonelected claims are withdrawn from further consideration (subject to petition for rejoinder under § 1.144)	Elected species is examined, and if that species is patented then <i>the requirement dissolves, all claims come back</i> the genus and other species are also examined

If one claim is generic to another, the broader claim is a "linking claim" under MPEP § 806.05(III) and § 809	If <i>any generic claim</i> is allowed, the election of species requirement dissolves as if it never existed, and all claims are examined
Further Replies to Office Action use the claim status identifier "(Withdrawn)"	Further Replies to Office Action show nonelected claim status "(Original)," "(Currently amended)," or "(Previously presented)"
Once either form is final, you can petition to withdraw the restriction, for rejoinder (37 C.F.R. § 1.144) (the two are sometimes different!) and/or file a divisional	

A regulatory election of species has no direct statutory authority. So it has to fit into the statute somehow. The way it fits is like a financial "call" option on a future restriction -- an election of species has no effect today, it only creates a right for the examiner that *will* arise and *will* mature into a statutory restriction in the future, if certain contingencies occur.

**Why bother?** The conventional wisdom is that it ain't worth the cost to traverse restrictions. That considers only the short term costs, and considers only a cramped set of options for traverse. Over the life of a family of patent applications, restrictions create a giant pile of costs. There are plenty of ways to traverse non-injurious; this post teaches you about some of them, and how to look for the rest. The cost equation shifted remarkably with the expansion of exhaustion in the Supreme Court's *Quanta Computer, Inc. v. LG Electronics, Inc.*, 553 US 617 (2008), which extinguished most of the advantages of division. There are many reasons to traverse a restriction or election of species requirement, and for keeping as many claims together as possible (there are exceptions, of course, and maybe we'll talk about them some day).

1. Costs (more filing fees, more issue fees, more maintenance fees, more hassle in managing more cases, the n-squared cost of managing IDS's for parallel cases).
2. The CCPA noted at least twice that the whole is more than the sum of its parts because of adverse claim construction inferences, and that sometimes you *can't* recover the full scope of the original claims with any number of divisionals. *In re Marti*, 359 F.2d 900, 149 USPQ 534 (CCPA 1966) and *In re Weber*, 580 F.2d 455, 198 USPQ 328 (CCPA 1978).
3. Once one set of claims issues, all too often the examiner finds better art and rejects the second set of claims on grounds that really hurt the parent. Now you now have bad dents and tarnish on the claims in the parent issued patent, and no meaningful way to fix it.
4. And almost always in 2021, the examiner's chopping is so fine that it would be cost-prohibitive to try to recover all subject matter through a large number of divisionals.
5. Delays in issuance of some of the claims (if you have to restrict, the restricted claims will issue at least 18 months later than the other claims).
6. Reduction in patent term (you lose 14 months of patent term adjustment for the time until the divisional application comes up for first examination).
7. The longer the application is pending and the more different claims pending, the greater the opportunity to amend the claims to track competitors' products.
8. Likewise, the longer the application is pending and the more different claims pending, the greater the opportunity to tailor the claims to track evolution of your client's own commercial product.
9. Loss of patent term adjustment: Almost always, the first patent in a family has the greatest accumulation of patent term adjustment, but daughter cases will have close to zero. If you keep all claims together, all claims benefit from that longer term.
10. Keeping more claims together usually delays final rejection, which in turn usually increases patent term adjustment.

11. Some very disingenuous examiners, if they require election of species between A B and C, and you try to add a C limitation to a B claim, will claim you can't do it. The examiner is cheating of course, but it's an additional cost if you acquiesce to a bogus restriction/election.
12. Substantive risks of inconsistent arguments (at the very least, you will have to make arguments in the later cases that you could not have foreseen during prosecution of the earlier cases)
13. Division of claims increases risks of prosecution history estoppel and disclaimer of broader claim scope.
14. Contrary to popular belief, double patenting is a real risk. The § 121 safe harbor for divisionals has many prerequisites, it's far from a given. Basically, if you make an election today, and you amend any of the claims at any time in the future, the result may no longer be "consonant," and the § 121 safe harbor would no longer apply. *Geneva Pharms., Inc. v. GlaxoSmithKline PLC*, 349 F.3d 1373, 1381, 68 USPQ2d 1865, 1871 (Fed. Cir. 2003).
15. It's not clear that an election of species qualifies as a statutory restriction to trigger the § 121 safe harbor. Though I know of no case directly on point in either direction, it's possible that if you **don't** pursue the remedies available to you to traverse an election of species (which, after all, is not a *present* restriction, only an option or warning of a *future* restriction), a court could conclude that your continuation is a voluntary divisional, and that the § 121 safe harbor doesn't apply. See *Geneva Pharms., Inc. v. GlaxoSmithKline PLC*, 349 F.3d 1373, 1379–80, 68 USPQ2d 1865, 1870 (Fed. Cir. 2003) ("In the [parent] application, the method of use claims were not entered. Therefore, those claims could not have been subject to a restriction requirement. If the applicants sought the benefit of § 121, the applicants should have requested entry of the claims so that the PTO could issue a formal restriction requirement under [37 C.F.R.] § 1.145.")
16. Blocking an examiner from shortcutting (well, let's call it what it is -- cheating) early in the process seems to reduce shortcutting later in the process. If you give candy to a playground bully, you'll get pounded again. If you make clear that you are not a patsy, the bully stops.

Now -- **HOW** do you traverse? That's the important question. There are at least four ways to traverse a statutory restriction or regulatory election of species --

- not independent and distinct (which is here only of academic interest -- you'd NEVER actually argue this)
- no **showing** of independent and distinct as a procedural matter (or the showing is transparently flimsy)
- no serious burden
- no **showing** of serious burden

and three more for a regulatory election of species:

- not mutually exclusive (that's almost always a good ground of traverse an election of species in anything except chemistry)
- if the examiner gives you three ways to characterize the group (figures, words to characterize the group, and claims), you can pick any one of the three characterizations of the group, and ignore the other two. This isn't really a "traverse" as much as a jiu-jitsu move, where you use the examiner's own weight to cause the fall.
- You can defeat an election of species by the designation of generic claims and designation of "readable on." In many cases, most claims will be "readable on" many of the examiner's groups. It's a mistake to assume that any claim can only be a member of one group. Again, this isn't really a "traverse" as much as a jiu-jitsu move -- if the examiner is off-balance, you only need to give the gentlest nudge to cause the fall.

True, you **NEVER EVER EVER** traverse on "not independent and distinct" (for a statutory restriction) or "not patentably distinct" (for a regulatory election of species). That's a suicide pact (if one claim dies of natural causes, the other has a pre-arranged obligation to commit suicide). But that leaves plenty of other grounds for traverse! Which means that all traverses are either procedural (the examiner skipped a necessary showing to establish "independent and distinct") or arise under the "no serious burden" prong, or the "not mutually exclusive" prong for election of species.

**Challenging a statutory restriction requirement between independent claims.**

MPEP § 803 states that the examiner must make two showings for any restriction requirement: "independent and distinct" and "serious burden."

**Independent and distinct.** The only really safe way to challenge "independent and distinct" is to challenge a procedural aspect in a way that contains no admission that the subject matter of the two inventions is even related. The things I see over and over:

- Almost all of the form paragraphs require examiners to show search class and subclass for each group. Look up the class/subclass in the Manual of Classification. About 10% of the time, one of the classes doesn't exist—the examiner just made it up. Another 50% of the time, one or more of the search classes exists but is completely bogus, selected in clear bad faith. Only 20-30% of the time are the two classes/subclasses plausible. Often there's another class/subclass that's spot on for all groups, and the examiner overlooked it. You can argue whatever is appropriate.
- About 1/3 of the time, the examiner "edited" the relevant form paragraph. Find the relevant form paragraph in MPEP Chapter 800, and test it. If the examiner shortcut, you've got a good ground to traverse that won't hurt you. See 16/189,765, Decision on Petition of April 29, 2022.
- MPEP § 809.02(a)(B) requires that an Action identify the characteristics of the disclosed species among which election is proposed that establish the basis for division and classification. Examiners skip this more often than they show it.

**Serious burden.** MPEP § 808.02 clarifies that there are only three ways to show "serious burden:" "separate classification," "separate status in the art," and "different field of search." MPEP § 803(I)(B), § 803(II) ¶ 4, and § 806.01 requires "Examiners must provide reasons and/or examples to support conclusions" of "unduly extensive and burdensome search," for example, by "appropriate explanation of separate classification, or separate status in the art, or a different field of search." Examiners stopped doing this around 2010. The requirement is still in the MPEP, and you can OFTEN shut down a restriction if you demand such a showing.

**Showing no serious burden.** If the examiner makes the requirement final, look at the "Examiner's Search Strategy" document for the first Action. Often, in examining the elected invention, the examiner will search the class/subclass for one or more of the unelected inventions. With that information in hand, you can petition based on "no serious search burden." See 16/189,765, Decision on Petition of April 29, 2022 (the Decision raised this issue *sua sponte* -- I didn't petition it). With that little tidbit in mind, if you are ambivalent about which invention to elect, pick the one with the higher-bogosity search class/subclass, because it's most likely that the examiner's first search will set up this argument for you.

### **Challenging a regulatory election of species requirement (almost always between dependent claims).**

**Strategic point 1.** The PTO's only authority for election of species requirements lies in the restriction statute. MPEP § 809.02(a) clarifies that the requirements that must be shown for a Requirement for Election of Species are a superset of the showings required for a valid Restriction Requirement. Examiners skip this essentially 100% of the time—showings of "independent and distinct" and "serious burden" are a true rarity. Perfectly good basis for traverse.

**Strategic point 2.** In addition, an election of species requirement requires that the species be "mutually exclusive." MPEP § 806.04(f).

**Strategic point 3.** It's crucial to remember the key property of an election of species requirement—if any generic claim is allowed, then all groups of which that claim is a member come back in. So in an election of species requirement, your main goals are—

- (1) describe as many claims as possible as generic to as many groups as possible.
- (2) of the claims that you can't genericize, get as many into your elected group as possible.

In most cases, if you do those two well, any traverse is almost a tertiary concern.

**Strategic point 4. "Readable on" is not "reads on."** "Readable on" is a term that is only used in this context -- it has no other meaning or use in patent law, and the MPEP doesn't define it. "Readable on" doesn't mean "this isolated feature in this specific claim looks a little bit like that figure." "Reads on" means "every limitation, limitation-by-limitation, exactly." That's obviously not what the MPEP means. "Readable on" has to be DIFFERENT. The only sensible meaning of "readable on" is "has no limitation that rules out all possible correspondence." So if Figs 1-23 show various configurations of the inlet port, and Fig. 24 shows a round outlet port, and Fig. 25 shows a square outlet port, then a claim that says "wherein the outlet port is rectangular" **reads on** Fig 25, but is **readable on** Figs. 1-23 and Fig 25. A claim that has *absolutely nothing* to do with an examiner's figure is almost always "readable on" that figure, since there's nothing to exclude it, and it's not "mutually exclusive" of that figure, right? If the examiner gave you an irrelevancy, use it to your advantage. Remember that election of species was originally designed for chemistry, where atoms are discrete and it's easy to see when two claims are "mutually exclusive" (this one says "a methyl group" and that one says "chlorine"). With that background, it's easy to see what "readable on" means.

**Strategic point 5.** Carefully **read** the examiner's paper, and compare it to the MPEP. Cheating is rampant:

- Often, the examiner edited "the hard part" out of the form paragraph. Cheating.
- Most of the form paragraphs require the examiner to designate a search class/subclass — often, an examiner will leave that out. Cheating.
- Look up the examiner's class/subclass in the Manual of Classification — regularly, one of the subclasses **doesn't exist** at all. Cheating.
- Well over half the time, one or more is totally bogus, and **nothing** to do with the invention — clearly the examiner just threw darts. Cheating.
- Spend the time to find the right class/subclass the claims **should** be searched in, and point out that that removes the examiner's "serious burden of search."

These strategic points give you great power, the power by which I defeat every single election of species requirement, and the overwhelming majority of restriction requirements, I've had in 29 years. The four-letter difference between "reads on" vs. "readable on" lets you designate essentially all claims as generic to multiple groups.

Let's illustrate, using the following set of example claims and figures:

1. A widget with an inlet port and an outlet port.
2. The widget of claim 1, further comprising a baffle in the outlet port.
3. The widget of claim 1, wherein the inlet port is round.
4. The widget of claim 1, wherein the inlet port is square.
5. The widget of claim 1, wherein the inlet port is long.
6. The widget of claim 1, wherein the outlet port is long.
7. The widget of claim 1, wherein the outlet port is short.
8. The widget of claim 1, wherein the outlet port is round.

Fig. 1 shows a widget in which the inlet port is long and round, and the outlet port is short and square with a baffle. Fig. 2 shows another widget, in which the inlet port is long and square, and the outlet port is short and round. Fig. 3 is a detail view of only an inlet port, in which the inlet port is short and rectangular. Fig. 4 is a detail view of only an outlet port, in which the outlet port is long and round.

You might respond:

Group I relates to a round inlet port. Claims 1–3 and 5–8 are readable on group I.

Group II relates to a square inlet port. Claims 1, 2, and 4–8 are readable on group II.

Group III relates to a rectangular inlet port. Claims 1, 2, and 5–8 are readable on group III.

Group IV relates to a round outlet port. Claims 1–8 are readable on group IV.

Applicant elects group IV. Claims 1–2 and 5–8 are generic to all groups. Claim 3 is generic to groups I and IV. Claim 4 is generic to groups II and IV.

Boom. You still have to raise some traverse, to preserve future rights. But the heart of the technique is a perfectly good election. By making all claims generic, you've neutered the requirement, and you give up essentially nothing.

Often I amend the dependent claims to reduce restrictability. For example, I add dependent claims that make clear that the species or inventions are useable in combination.

Factors to consider in selecting a species include:

- Select a species that has explicit enabling and written description support (particularly important in biotech/chem/pharma cases)
- Select a species that, to the best information you and the client have, is free of the art
- If the likely commercial embodiment is known, select the species that covers the commercial embodiment
- Select the species that retains the most options for downstream prosecution, which is usually the most generic species

**Leverage against final.** One of my favorite techniques, if the restriction is obviously goofy, is to traverse the requirement, let the requirement go and prosecute the elected claims on the merits to final rejection or allowance, and then petition. Poof. Final rejection withdrawn. I'm less inclined to do this if either the restriction or the prosecution on the merits is sound, but if the examiner is clearly jerking me around, this puts a stop to it..

For some examples, see

- <https://forum.napp.org/topic/1771-successful-example-of-how-to-deal-with-a-bogus-election-of-species-based-on-figures>
- 16/018,626, Aug 7, 2020 to Feb 3, 2021
- 14/280,469 March 30, 2020
- 11/533,300 Feb 12, 2013
- 14/266,013 Aug 31, 2019
- 15/285,209 Dec 5, 2017
- 15/430,467, petition of July 6, 2020, Decision of Oct 13, 2020 (statutory restriction)
- 14/280,469, petition of June 7, 2021, decision of July 23, 2021.
- 16/189,765, petition of April 15, 2022, decision of April 29, 2022 (withdrawal of statutory restriction -- examiner misparaphrased the form paragraph, and searched the relevant search class/subclass)

On Tue, Jun 21, 2022 at 3:52 PM Kees, Nicholas via Efs-web <[efs-web@oppedahl-lists.com](mailto:efs-web@oppedahl-lists.com)> wrote:

That sounds like an immensely useful list. I'll have to search for that!

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**From:** Efs-web <[efs-web-bounces@oppedahl-lists.com](mailto:efs-web-bounces@oppedahl-lists.com)> **On Behalf Of** Scott Nielson via Efs-web  
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**Subject:** Re: [Efs-web-L] To traverse or to not traverse a restriction requirement?  
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There are a lot of grounds on which you can dispute the restriction requirement without conceding the inventions are obvious variations of each other. David Boundy has a nice write-up of them, which he circulates occasionally on the list.

**Scott Nielson**  
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**From:** Efs-web <[efs-web-bounces@oppedahl-lists.com](mailto:efs-web-bounces@oppedahl-lists.com)> **On Behalf Of** Kees, Nicholas via Efs-web  
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**Subject:** Re: [Efs-web-L] To traverse or to not traverse a restriction requirement?  
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But wait. Isn't the problem with traversing a restriction (at least in the mechanical/electrical arts) that, in order to do so, you have to admit on the record that the two inventions are not patentably distinct? If you do that, and if the Examiner does find good art on Group I (for example), haven't you then foreclosed yourself from arguing that the "slight differences" of Group III (which are still in the case because you convinced the Examiner that they should stay together because they are not patentably distinct) make the latter patentable?

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**From:** Efs-web <[efs-web-bounces@oppedahl-lists.com](mailto:efs-web-bounces@oppedahl-lists.com)> **On Behalf Of** Scott Nielson via Efs-web  
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**Subject:** Re: [Efs-web-L] To traverse or to not traverse a restriction requirement?  
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Hi Allen,

Examiners will issue restriction requirements to reduce the number of claims they must examine and increase their counts (they are required to produce a certain number of counts in a given period). They do this without any regard for the merits of the restriction requirement.

In your case, I can foresee problems if you do not dispute at least the restriction of Groups I and III. As you said below, the claims in Groups I and III are only “slightly different” in scope. The problem is that the examiner may box you in so tightly with the restriction requirement so you cannot amend the claims later to overcome prior art.

This happened to me recently. The client was willing to cooperate with the examiner’s meritless restriction requirement to avoid creating other issues. However, we soon found it impossible to amend the claims to overcome a cited reference because the claims would no longer be within the scope of the restriction requirement. We were forced to file a petition disputing the restriction requirement, which we won. Unfortunately, the examiner retaliated in the next office action by rejecting us on every little thing he could find (e.g., written description, indefiniteness, drawings not showing every feature, etc.).

Regarding an obviousness double patenting rejection, it sounds like it’s no big deal to file a terminal disclaimer so there doesn’t appear to be a downside to disputing the restriction requirement.

**Scott Nielson**  
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**From:** Efs-web <[efs-web-bounces@oppedahl-lists.com](mailto:efs-web-bounces@oppedahl-lists.com)> **On Behalf Of** Allen Richter (allenr--- via Efs-web  
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**Subject:** [Efs-web-L] To traverse or to not traverse a restriction requirement?

**Sensitivity:** Confidential

Hi to all,

I just received a restriction requirement.

If arguments submitted to traverse the restriction are accepted, is there actually an advantage to it?

I am asking because without (successful) traverse, I will be safe from non-statutory obviousness rejection.

Maybe I should add that:

“Group I” pertains to a first system;

“Group II” pertains to a method including the steps performed by the first system

“Group III” pertain to a second system of slightly different scope than the first system.

Eventually also relevant: the Applicant is not an entity interested in licensing its patents (as opposed to, for example, a TTO), meaning that if required, filing a Terminal Disclaimer should not pose any issue.

I look forward to receiving your input.

Thank you all in advance.

Allen

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