

**QE 2019 PAPER C – MARKING SCHEDULE**

S/N	Category	Marks
1	Construction	29 marks
2	Infringement	23 marks
3	Validity – Novelty	11 marks
4	Validity – Inventive Step	17 marks
5	Advice and Miscellaneous Issues	20 marks
		<b>100 marks</b>

### 1. Construction (29 Marks)

Claim	Feature	Meaning	Mark
1.1	A portable foldable tray, comprising:	"tray" = plain meaning; a flat board on which things may be placed	0.5
		"Tray" may also mean a shallow container with raised rim, used for carrying things. However, the skilled person would understand from the description and drawings that the patentee intended for the word to have the broader meaning (i.e., not to include a rim and/or have any depth)	1
		"portable" = plain meaning; able to be easily carried or moved	0.5
		"comprising" = must include all the features listed in the claim but is not limited thereto	0.5
1.2	a foldable housing comprising a first section and a second section;	"foldable" = plain meaning; capable of being folded	0.5
		"housing" = a case or enclosure	0.5
		"foldable housing comprising a first section and a second section" = the foldable housing has at least two sections	0.5

1.3	a spine connecting the first section and the second section at a spine width; and	"spine" = purposive construction; not limited to a connector that runs along substantially the entire length of the first and second sections but can be the portion of the foldable tray which adjoins the first section and the second section, which allows the first and second sections to become folded together (see [0004]; center spine 130)	3; no marks to be awarded if the narrow construction is adopted
		"connecting the first section and the second section <u>at a spine width</u> "  Reasonable discussion as to whether this requires that the first and second sections are separated by a distance equal to the width of the spine or whether it will also cover use of a hinge to connect two abutting sections.	2
1.4	a hygienic surface that overlaps at least one portion of a first side of the first section and at least one portion of a first side of the second section,	"hygienic" = clean and unlikely to cause disease	0.5
		"hygienic surface" = A surface that is isolated from external contact and/or contamination when the tray is in use.	1
		Reasonable discussion as to whether the hygienic surface must also be isolated from external contact and/or contamination when the tray is in storage. Answer should be no as this is not required by the claim and importing this limitation from [0003] of the description would be unduly limiting the claim. Further, apart from keeping the hygienic surface clean	2

		<p>by isolating it when the tray is folded, the description also teaches use of replaceable sheets (see [0011]). This can be another way to keep the surface away from contact with the surface on which the portable foldable tray is placed.</p> <p>Accordingly, “hygienic surface” is purposively interpreted to mean a surface that is kept away from contact with the surface on which the portable foldable tray is placed <u>when the tray is in use</u>, in order to keep items on the hygienic surface clean.</p>	
		"hygienic surface that overlaps at least one portion of a first side of the first section and at least one portion of a first side of the second section" = the hygienic surface may but need not overlap the entire first section or the entire second section	0.5
1.5	wherein the hygienic surface is removable from the at least one portion of the first side of the first section and the at least one portion of the first side of the second section,	<p>"removable" = plain meaning; able to be taken off or away from the portable foldable tray</p> <p>Additionally, the skilled person would understand that the hygienic surface should be readily removable during use without having to apply special techniques or excessive force and/or without damaging the tray</p>	0.5
1.6	the hygienic surface folds along a portion that coincides with the spine,	"hygienic surface folds" = the position of one part of the hygienic surface can change relative to another part.	1

		Reasonable discussion as to whether the hygienic surface is made up of a single, continuous surface or may be made up of two or more surfaces. If it is the latter, can the hygienic surface still be said to “fold” along the portion that coincides with the spine?	2
		<i>[NB: Mark will still be awarded if “fold” is construed to require the surface be a single flexible surface. However, the conclusion for both parts must be consistent.]</i>	
		Reasonable discussion as to whether this is limited to a single fold or would also include multiple folds as illustrated in FIG. 2A. If the construction of “at a spine width” is that it excludes a hinge, then “fold” cannot be a single fold. Mark will only be awarded if this conclusion is consistent with the construction of “at a spine width”.	1
		"the hygienic surface folds along a portion that coincides with the spine" = the hygienic surface is foldable anywhere within the spine width that adjoins the first section and the second section	1
1.7	at least the hygienic surface is impermeable to fluids.	"impermeable to fluids" = plain meaning; does not allow fluids to pass through	0.5
		"at least the hygienic surface is impermeable to fluids" = the hygienic surface must be impermeable to fluids; other parts of the foldable tray may, but are not required to,	1

		also have this property	
2	The portable foldable tray of claim 1, further comprising a fold closure that secures the first section to the second section in a folded configuration.	"fold closure that secures the first section to the second section in a folded configuration" = a fastening or locking mechanism that holds the sections together when the tray is folded	0.5
3	The portable foldable tray of claim 1, further comprising a friction increasing component on at least one external side of at least the first section and the second section.	"friction increasing component" = a feature for providing more resistance or traction, to prevent movement of the tray along the surface on which it is placed	0.5
		"external side" = a side of the first section or the second section that is different than the "first side of the first section" and the "first side of the second section" recited in claim 1	1
		"at least one external side of at least the first section and the second section" = The friction increasing component must be provided on an external side of both the first section and the second section.	1
		"at least one external side" suggests that each of the first and second sections can have more than one external side, and the friction increasing component being arranged on <u>one or more</u> external sides of each of the first and second sections of the foldable housing.	0.5

4	The portable foldable tray of claim 1, wherein the hygienic surface is configured to be isolated from contact with an available surface on which the portable foldable tray is placed.	"the hygienic surface is configured to be isolated from contact with an available surface on which the portable foldable tray is placed" = the hygienic surface does not come into contact with the surface on which the tray is placed	0.5
		Reasonable discussion as to whether this requires the hygienic surface to be isolated from the tabletop even when the tray is not in use. The claim is silent on the configuration of the tray (i.e., whether opened or closed), so this must be the interpretation.	4
Total Marks			29

## 2. Infringement (23 Marks)

Claim	Feature	Meaning	Present in alleged infringing product in Document B?	Marks
1.1	A portable foldable tray, comprising:	<p>"tray" = plain meaning; a flat board on which things may be placed.</p> <p>"Tray" may also mean a shallow container with raised rim, used for carrying things. However, the skilled person would understand from the description and drawings that the patentee intended for the word to have the broader meaning.</p> <p>"portable" = plain meaning; able to be easily carried or moved</p> <p>"comprising" = must include all the features listed in the claim but is not limited thereto</p>	<p>Yes - Product is a cutting board, which can be a "tray" according to its broad meaning.</p> <p>The skilled person would understand that cutting boards are generally of a size and weight to be considered "portable".</p> <p>The cutting board is also foldable via the hinge 103.</p>	<p>0.5</p> <p>0.5</p> <p>0.5</p>
1.2	a foldable housing comprising a first section and a second	"foldable" = plain meaning; capable of being folded	Yes – The base 100, first section 101 and second section 102 are	1



Claim	Feature	Meaning	Present in alleged infringing product in Document B?	Marks
	section;	<p>"housing" = a case or enclosure</p> <p>"foldable housing comprising a first section and a second section" = the foldable housing has at least two sections</p>	the "foldable housing", "first section" and "second section" respectively. The first and second sections of the product 101, 102 can be folded together (see FIGURE 2).	
1.3	a spine connecting the first section and the second section at a spine width; and	<p>"spine" = purposive construction; not limited to a connector that runs along substantially the entire length of the first and second sections but can be the portion of the foldable tray which adjoins the first section and the second section, which allows the first and second sections to become folded together (see [0004]; center spine 130)</p> <p>"connecting the first section and the second section <u>at a spine width</u>"</p> <p>Reasonable discussion as to whether this requires that the first and second sections are</p>	<p>Yes/No (arguable) –</p> <p>Depends on construction of "spine".</p> <ul style="list-style-type: none"> <li>If "spine" is construed broadly to include two separate sections joined by a hinge, then this feature is present as then hinge 103 is the "spine" which attaches the first section 101 to the second section 102, as it allows the sections to be opened to a flattened state or</li> </ul>	

Claim	Feature	Meaning	Present in alleged infringing product in Document B?	Marks
		separated by a distance equal to the width of the spine or whether it will also cover use of a hinge to connect two abutting sections.	<p>folded in a closed state (see [0003]).</p> <ul style="list-style-type: none"> <li>If “spine” is construed narrowly to require a connector to run along substantially the entire length of the first and second sections, then this feature may not be present. Will depend on the structure of the hinge, which is not shown in the drawings.</li> </ul> <p>Marks will still be awarded if a different interpretation is taken, provided it is consistent with the interpretation and supported by a reasonable discussion (e.g., consider if the “spine” can simply be the line between the first and second sections when the cutting</p>	

Claim	Feature	Meaning	Present in alleged infringing product in Document B?	Marks
			board is in the opened state).  For reasonable discussion as to whether “spine” is present.  “connected... at a spine width” – Yes/No, depending on the construction given.	3   1
1.4	a hygienic surface that overlaps at least one portion of a first side of the first section and at least one portion of a first side of the second section,	<p>"hygienic" = clean and unlikely to cause disease</p> <p>"hygienic surface" = A surface that is isolated from external contact and/or contamination when the tray is in use.</p> <p>Reasonable discussion as to whether the hygienic surface must also be isolated from external contact and/or contamination when the tray is in storage. Answer should be no as this is not required by the claim and importing this limitation from [0003] of the description would be unduly</p>	<p>Depends on the construction given - in particular, whether "hygienic surface" must be a single, continuous surface or may be made up of two or more surfaces.</p> <p>Since the product is a cutting board, the skilled person would understand that it is desirable for these surfaces to be kept clean. Also see [0001] which discusses</p>	1

Claim	Feature	Meaning	Present in alleged infringing product in Document B?	Marks
		<p>limiting the claim. Further, apart from keeping the hygienic surface clean by isolating it when the tray is folded, the description also teaches use of replaceable sheets (see [0011]). This can be another way to keep the surface away from contact with the surface on which the portable foldable tray is placed. Accordingly "hygienic surface" is purposively interpreted to mean a surface that is kept away from contact with the surface on which the portable foldable tray is placed <u>when the tray is in use</u>, in order to keep items on the hygienic surface clean.</p> <p>"hygienic surface that overlaps at least one portion of a first side of the first section and at least one portion of a first side of the second section" = the hygienic surface may but need not overlap the entire first section or the entire second section</p>	<p>problems with cross-contamination. As such, either cutting surface 105 and/or cutting surface 106 can be understood to be the "hygienic surface".</p> <p><b>If the conclusion is that "hygienic surface" may be made up of two or more surfaces:</b></p> <p>Cutting surfaces 105, 106, <u>taken together</u>, constitute the "hygienic surface".</p> <p>Cutting surface 105 overlaps with a portion of the first section 101, while cutting surface 106 overlaps with a portion of the second section 102 (see FIGURE 1). Taken as a whole, both cutting surfaces 105</p>	

Claim	Feature	Meaning	Present in alleged infringing product in Document B?	Marks
			<p>and 106 overlap with at least a portion of each of the first and second sections 101, 102. Thus, this integer is PRESENT.</p> <p><b>If the conclusion is that "hygienic surface" must be a single or integrated piece:</b></p> <p>Either cutting surface 105 or cutting surface 106 can be the "hygienic surface". However, as neither of cutting surfaces 105 or 106 overlaps with both the first and second sections 101, 102, this integer is NOT PRESENT.</p> <p>Total marks available for this discussion</p>	5

Claim	Feature	Meaning	Present in alleged infringing product in Document B?	Marks
1.5	wherein the hygienic surface is removable from the at least one portion of the first side of the first section and the at least one portion of the first side of the second section,	<p>"removable" = plain meaning; able to be taken off or away from the portable foldable tray</p> <p>Additionally, the skilled person would understand that the hygienic surface should be readily removable during use without having to apply special techniques or excessive force and/or without damaging the tray.</p>	Yes – The cutting surfaces 105, 106 can be slid into insets 109 provided in the base 100, or slid off for cleaning (see [0001], [0005] and FIGURE 3).	1
1.6	the hygienic surface folds along a portion that coincides with the spine,	<p>"hygienic surface folds" = the position of one part of the hygienic surface can change relative to another part.</p> <p>Reasonable discussion as to whether the hygienic surface is made up of a single, continuous surface or may be made up of two or more surfaces. If it is the latter, can the hygienic surface still be said to "fold" along the portion that coincides with the spine?</p>	<p>Depends on the construction given - in particular, whether "hygienic surface" must be a single, continuous surface or may be made up of two or more surfaces.</p> <p><b>If the conclusion is that "hygienic surface" may be made up of two or more surfaces:</b></p> <p>Cutting surfaces 105, 106, <u>taken</u></p>	

Claim	Feature	Meaning	Present in alleged infringing product in Document B?	Marks
		<p><i>[NB: Mark will still be awarded if “fold” is construed to require the surface be a single flexible surface. However, the conclusion for both parts must be consistent.]</i></p> <p>Reasonable discussion as to whether this is limited to a single fold or would also include multiple folds as illustrated in FIG. 2A. If the construction of “at a spine width” is that it excludes a hinge, then “fold” cannot be a single fold. Mark will only be awarded if this conclusion is consistent with the construction of “at a spine width”.</p> <p>“the hygienic surface folds along a portion that coincides with the spine” = the hygienic surface is foldable anywhere within the spine width that adjoins the first section and the second section</p>	<p><u>together</u>, constitute the “hygienic surface”. The cutting board can be folded even when the cutting surfaces 105, 106 are installed. Reasonable discussion as to whether this satisfies the claim.</p> <p><b>If the conclusion is that “hygienic surface” must be a single or integrated piece:</b></p> <p>Neither cutting surface 105 nor cutting surface 106 is foldable. Thus, this integer is NOT PRESENT.</p> <p>The analysis should also be consistent with the conclusion as to whether the hygienic surface can be said to “fold” if it is made up of</p>	

Claim	Feature	Meaning	Present in alleged infringing product in Document B?	Marks
			two or more separate pieces.  Total marks available for this discussion	3
1.7	at least the hygienic surface is impermeable to fluids.	"impermeable to fluids" = plain meaning; does not allow fluids to pass through  "at least the hygienic surface is impermeable to fluids" = the hygienic surface must be impermeable to fluids; other parts of the foldable tray may, but are not required to, also have this property	Yes – The skilled person would understand that for the cutting surfaces of a cutting board have to be impermeable to fluids.	1
2	The portable foldable tray of claim 1, further comprising a fold closure that secures the first section to the second section in a folded configuration.	"fold closure that secures the first section to the second section in a folded configuration" = a fastening or locking mechanism that holds the sections together when the tray is folded	Yes – Magnetic closure 108 and closure lip 107, which work together to secure the first and second sections 101, 102, make up the "fold closure".	0.5



Claim	Feature	Meaning	Present in alleged infringing product in Document B?	Marks
3	The portable foldable tray of claim 1, further comprising a friction increasing component on at least one external side of at least the first section and the second section.	"friction increasing component" = a feature for providing more resistance or traction, to prevent movement of the tray along the surface on which it is placed	Potentially / Unclear – Non-skid pads provided at the bottom of the base 100 constitute the "friction increasing component" (see [0006]).	1
		"external side" = a side of the first section or the second section that is different than the "first side of the first section" and the "first side of the second section" recited in claim 1	It is unclear from the press release exactly where the non-skid pads are located, but this integer will be present if the pads are provided on the bottom of both the first and second sections 101, 102.	2
		"at least one external side of at least the first section and the second section" = The friction increasing component must be provided on an external side of both the first section and the second section.		
		"at least one external side" suggests that each of the first and second sections can have more than one external side, and the friction increasing component being arranged on <u>one or more</u>		

Claim	Feature	Meaning	Present in alleged infringing product in Document B?	Marks
		external sides of each of the first and second sections of the foldable housing.		
4	The portable foldable tray of claim 1, wherein the hygienic surface is configured to be isolated from contact with an available surface on which the portable foldable tray is placed.	<p>"the hygienic surface is configured to be isolated from contact with an available surface on which the portable foldable tray is placed" = the hygienic surface does not come into contact with the surface on which the tray is placed</p> <p>Reasonable discussion as to whether this requires the hygienic surface to be isolated from the tabletop even when the tray is not in use. The claim is silent on the configuration of the tray (i.e., whether opened or closed), so this must be the interpretation.</p>	<p>Depends on the construction given - in particular, whether "hygienic surface" must be kept apart from the tabletop both when the tray is in storage and when it is in use.</p> <p>In this case, the cutting surfaces 105, 106 are on the outside when the cutting board is folded, so the answer should be that the feature "the hygienic surface is configured to be isolated from contact with an available surface on which the portable foldable tray is placed" is NOT PRESENT if the interpretation is that the hygienic surface is to be an internal surface (i.e., isolated</p>	

Claim	Feature	Meaning	Present in alleged infringing product in Document B?	Marks
			<p>from the tabletop when the tray is not in use).</p> <p>However, for a broad and purposive interpretation “hygienic surface” to mean a surface that is kept away from contact with the surface on which the portable foldable tray is placed, in order to keep items on the hygienic surface clean, the cutting surfaces 105, 106 of the cutting board are indeed kept away from contact with the surface of a table or work top.</p> <p>Total marks available for this discussion</p>	2
<b>Total Marks</b>				<b>23</b>

### 3. Validity – Novelty (11 Marks)

Claim	Feature	Present in Document C?	Marks	Present in Document D?	Marks
1.1	A portable foldable tray, comprising:	<p>Yes – Invention relates to a cutting board, which can be a "tray" according to the broad meaning of the word.</p> <p>Alternatively, if "tray" is construed narrowly to exclude a cutting board, then "tray" is not disclosed.</p> <p>Cutting boards are generally of a size and weight as to be considered portable.</p>	<p>0.5</p> <p>0.5</p>	Yes – Invention relates to a serving tray	0.5
1.2	a foldable housing comprising a first section and a second section;	No – The cutting board is not foldable	0.5	Yes – The serving tray is collapsible and has multiple sections	<p>0.5</p> <p>0.5</p>
1.3	a spine connecting the first section and the second section at a spine width; and	No – The spine must allow first and second sections of the cutting board to fold together. This feature is not present.	0.5	Yes – Each of quadrants (i) A and C, (ii) B and D or (iii) C and D, are joined by a hinge 8 (see [0003]).	0.5

Claim	Feature	Present in Document C?	Marks	Present in Document D?	Marks
		<i>[NB: The requirements for a foldable tray and first and second sections are disregarded for the remainder of the analysis.]</i>		The hinges separate the respective quadrants by the width of the hinges (see FIG. 1A).	1
1.4	a hygienic surface that overlaps at least one portion of a first side of the first section and at least one portion of a first side of the second section,	Yes – A cutting surface 20 ("hygienic surface") covers the entire top surface of the base board 10 (see [0002]).	0.5	No – The specification does not teach or suggest providing any surface that is separate from but overlaps with or is attached to the surfaces of the quadrants A, B, C or D.	0.5
1.5	wherein the hygienic surface is removable from the at least one portion of the first side of the first section and the at least one portion of the first side of the second section,	Yes – The cutting surface 20 is part of a replaceable skin layer 14 that is removably mounted on top of the base board (see [0002]).	1	No – The specification does not teach or suggest providing a "hygienic surface" (as above).	0

Claim	Feature	Present in Document C?	Marks	Present in Document D?	Marks
1.6	the hygienic surface folds along a portion that coincides with the spine,	No – The cutting board is not foldable.	0.5	As above.	0
1.7	at least the hygienic surface is impermeable to fluids.	Yes - The skilled person would understand that for the cutting surfaces of a cutting board have to be impermeable to fluids.  The description teaches that the curb 38 stops juices from flowing from the sides of the cutting surface (see [0004]). The skilled person would understand this to mean that the juices should also not permeate <i>through</i> the cutting surface onto the base board.	0.5	As above.	0
2	The portable foldable tray of claim 1, further comprising a fold closure that secures the first section to the second section in a folded configuration.	No - The cutting board is not foldable.	0.5	Yes – Latch mechanism 16 connecting edge portions 6' and 6" (see [0003] and FIG. 1A).	0.5

Claim	Feature	Present in Document C?	Marks	Present in Document D?	Marks
3	The portable foldable tray of claim 1, further comprising a friction increasing component on at least one external side of at least the first section and the second section.	Yes – Means for providing traction on the base board (e.g., rubber feet 28) (see [0005]).	0.5	No – Document D is silent on this feature.	0.5
4	The portable foldable tray of claim 1, wherein the hygienic surface is configured to be isolated from contact with an available surface on which the portable foldable tray is placed.	Yes – The cutting surface 20 does not come into contact with the surface on which the cutting board is placed.	0.5	No - The specification does not teach or suggest providing a "hygienic surface".	0.5
<b>Total Marks</b>			<b>6</b>	<b>Total Marks</b>	<b>5</b>

#### 4. Validity – Inventive Step (17 Marks)

Validity – Inventive Step	Marks
<p><b>Claim 1</b></p> <p>Is a mosaic of Documents C and D permitted?</p> <p>If so, identify best starting point - possibly Document C because it discloses most of the features of the invention in Document B.</p> <p>Document C discloses a cutting board with a replaceable cutting surface. The key difference between Document C and the invention in Document B lies in the fact that Document C fails to teach providing a foldable cutting board. Document D discloses a collapsible / foldable tray. The questions are:</p> <ul style="list-style-type: none"> <li>• Would it be obvious to the skilled person to introduce the folding feature of Document D to the cutting board of Document C?</li> <li>• Even if so, would the skilled person then arrive at the invention in Document B?</li> </ul> <p>Some points that may be raised are, for instance:</p> <ul style="list-style-type: none"> <li>• There is no teaching or suggestion in Document C that it would be advantageous for the cutting board to be foldable (e.g., for portability or ease of storage, or to protect the cutting surface).</li> <li>• Document C teaches that it is advantageous to provide a continuous curb 38 to stop juices and food particles from slipping or flowing from the skin layer (see [0004]). This teaches away from the invention in Document B as the unimaginative skilled person would not know how to make the cutting board foldable while retaining the curb 38. In fact, this seems to be impossible unless the curb is made discontinuous.</li> </ul>	12



Validity – Inventive Step	Marks
<p>Marks are to be awarded for the correct application of the Windsurfing test or the EP Problem-Solution approach, and depending on how convincing the argument put forth is.</p>	
<p><b>Claims 2-4</b></p> <p>Brief discussion as to whether each of claims 2-4 are inventive.</p> <ul style="list-style-type: none"> <li>• If the conclusion is that claim 1 is not inventive, then claims 2 and 3 are unlikely to be inventive as the features in these claims are also disclosed in Documents C and D, respectively. <b>[1 mark]</b></li> <li>• Reasonable discussion as to whether claim 4 is inventive. <b>[4 marks]</b></li> </ul>	<p>1</p> <p>4</p>
<b>Total Marks</b>	<b>17</b>

### 5. Advice and Miscellaneous Issues (20 Marks)

S/N	Advice and Miscellaneous		Marks
A	Summary of the position	Statement as to which claims are likely to be infringed, and which claims are likely to be invalid for lack of novelty or inventive step.	2
B	Possible action and remedies for infringement	<p>If the patent is infringed and valid over the prior art, who can it sue and what remedies will it be entitled to if successful in its claim, including</p> <ul style="list-style-type: none"> <li>• What are the chances that Mary Mary be able to obtain an interlocutory injunction to stop the client from selling its product pending trial?</li> <li>• Can the client be compensated by Mary Mary for losses resulting from the interlocutory injunction if Mary Mary ultimately fails in their infringement proceedings against the client?</li> <li>• Can the client be made to cough up the profits it has made if Mary Mary is successful in its claim?</li> </ul>	4
C	Possible amendments to patent	<p>If the patent is infringed but is invalid over the prior art, what possible amendments (e.g., incorporation of the limitations of claims 2, 3 or 4 into claim 1) can the patentee make to the patent to strengthen its position?</p> <p>Will the amended claims be infringed?</p>	<p>2</p> <p>2</p>
D	Revocation action	Client can consider revocation action on the ground that the invention lacks novelty or inventive step in light of the prior art. Possible to refer to EPO opposition proceedings and patentee's decision to amend to avoid the prior art.	2

S/N	Advice and Miscellaneous		Marks
E	Post-grant amendment applications – discretionary grounds	<p>Discussion on whether the client may be able to object to any amendment application filed by the patentee on grounds of (i) undue delay; and/or (ii) seeking an unfair advantage of the unamended patent.</p> <ul style="list-style-type: none"> <li>• Delay of at least 3 years in applying to amend the Singapore patent likely to constitute undue delay unless patentee can provide a satisfactory explanation for the delay.</li> <li>• Threatening an alleged infringer based on a patent which the owner knows to be invalid is a conduct which would be considered seeking an unfair advantage.</li> </ul> <p>Additional mark to be awarded for citing the relevant cases.</p>	<p>3</p> <p>2</p> <p>1</p>
F	Groundless threats	Discussion on whether the client may have a groundless threats claim, and what remedies it is entitled to if successful in the claim.	2
Total Marks			20

END