Complaint search — sample report

Crystal Lagoons U.S. Corp. v. Martin Aquatic Design & Engineering, LLC — the technical secrets in ¶ 45 of the Complaint

Examiner Search · Trade-secret public-domain search

2026-11-02

About this sample. This is a *Complaint search* — the search run before an identification is served — on a closed case, Crystal Lagoons U.S. Corp. v. Martin Aquatic Design & Engineering, LLC (S.D. Fla. 1:23-cv-23257, terminated 2025-08-01), charted on the technical categories (a)(1)–(4) and (b) of ¶ 45 of the Complaint to show the format. It was prepared without charge for publication, and is unsigned and not a legal opinion; no party asked for it.
Complaint search: $1,500, fixed, for up to 8 categories, with $500 credited toward a later chart or full report on the same case. **Once the identification is served:** *Identification chart*, quoted after we read it, from $3,000; *Full public-domain report*, from $6,000. Introductory pricing for our trade-secret practice. **To request one:** examinersearch.com/trade-secret · michael@examinersearch.com

1 Matter

Case	Crystal Lagoons U.S. Corp. and Crystal Lagoons Technologies, Inc. v. Martin Aquatic Design & Engineering, LLC et al., No. 1:23-cv-23257-RS (S.D. Fla., Miami), filed 2023-08-24, terminated 2025-08-01. A closed case, used here as a sample.
Pleading charted	Complaint (Dkt. 1), ¶ 45: eight categories of trade secrets, (a) to (h). This sample charts the technical categories (a)(1)–(4) and (b).
Subject	The design, construction and maintenance of very large artificial swimming lagoons (more than 2 acres, ¶ 42).
Counts	I Defend Trade Secrets Act; II Florida Uniform Trade Secrets Act; III breach of contract; IV breach of the covenant of good faith; V–VI fraudulent and negligent misrepresentation; VII tortious interference.
Dates used	Tier 1: public before 2018-05-01, when Crystal Lagoons and VenuWorks signed the Teaming Agreement (¶ 56) — the first disclosure the complaint describes to the people it says carried the information onward. Tier 2: public before February 2022, when Martin Aquatic hired Peter Licavoli (¶ 81); Blue Mar Basins launched in June 2022.

2 Bottom line

The complaint says its lagoon technology took "years and tens of millions of dollars to develop and refine" (¶ 86) and that the categories in ¶ 45 are "not generally known or readily ascertainable".

Most of what categories (a)(3), (a)(4) and (b) describe was published by the plaintiff itself, in patents and applications naming its founder, Fernando Fischmann, years before the Teaming Agreement. Crystal ’055 (published 2008) gives walls and bottoms of clay and bentonite under a PVC or polyethylene liner, a pipe network with injectors every 10 metres in the bottom, and every sector of the bottom cleaned within 7 days. Crystal ’490 (2011) has a suction device covering the bottom, only its effluent filtered, moved by boat, cart, robot or cable. Crystal ’361 (2015) gives walls sloped or vertical (at least about 45% in one embodiment) and a liner of about 0.1 to 5 mm, thermo-fused or strip-attached. Crystal ’926 (2017) gives a reversible device on V-shaped brushes moving at about 25 to 70 ft per minute.

The sloped beach edge of category (a)(1) appears before 2018 in other inventors’ patents: a 15–30 degree sloping ramp from an island into open water, and a wave pool whose bottom ends directly in a beach. The plaintiff’s own documents state a zero-entry edge and a 5% to 30% slope from 2019 — after the Teaming Agreement but before the alleged use.

Not found in any public document: a manual cleaning chamber at the beach, category (a)(2). Categories (c)(1) and (d) to (h) — costs, development process, suppliers, customers, pricing and strategy — are not matters a documents search can address. The complaint itself notes that the search report on Martin Aquatic’s own patent application cited two Crystal Lagoons patents (¶ 85).

Pleading	Primary combination	Every category quoted	Weakest point
¶ 45	Crystal ’055 + Crystal ’361 + Crystal ’926 + Crystal ’490	In part, across 4 references; none alone	(a)(2): no public document describes a manual cleaning chamber at the beach. (a)(1): before May 2018 the sloped beach edge appears only in other inventors’ documents; the plaintiff’s own edge slope is published from 2019.

Factual statements of what the documents show, category by category; this report expresses no opinion on whether any information is a trade secret. The statement of what each document shows is at the head of the chart (Section 7).

3 The case so far

Date	Event	What it means here
2008–2017	Crystal Lagoons publishes patents and applications on lagoon structure, liners and bottom cleaning.	Tier 1 documents (Section 7).
2018-05-01	Teaming Agreement between Crystal Lagoons U.S. Corp. and VenuWorks (¶ 56); VenuBlue formed 2018-05-30 (¶ 58).	Tier 1 date.
2019-06 to 2020-07	Peter Licavoli works for Crystal Lagoons U.S. Corp. as Regional Director (¶¶ 69, 72).	
2020-11-05	Teaming Agreement mutually terminated; Cleartide formed (¶¶ 66–67).	

Date	Event	What it means here
2021-04	Martin Aquatic forms Blue Mar Basins (BMB) (¶ 74).	
2022-02 / 2022-06	Martin Aquatic hires Licavoli; BMB launched (¶¶ 81, 84).	Tier 2 date: the alleged use.
2023-08-24	Complaint filed.	
2025-08-01	Case terminated.	

4 The secrets as pleaded

Complaint ¶ 45 — categories charted

Label	Pleaded category
(a)(1)	the beach edge design, specifications, and shape
(a)(2)	manual cleaning beach chamber design and specifications
(a)(3)	wall design, specifications, and configurations
(a)(4)	water piping and liner installation layout, design, and specifications
(b)	bottom cleaning system processes, designs, and specifications

5 Documents relied on

Name in the charts	Document	Where published	Date proof	Date tier	Role
Crystal '055 · Ex. 1	US 7,820,055 B2 (Fernando Benjamin Fischmann; Crystal Lagoons Corporation LLC), "Process to maintain large clean recreational water bodies"	USPTO	First published 2008-05-22 (US 2008/0116142 A1); issued 2010-10-26	Tier 1 — public before the Teaming Agreement (2018-05-01)	Primary (the plaintiff's own patent)
Crystal '490 · Ex. 2	US 2011/0108490 A1 (Fischmann; Crystal Lagoons), "Efficient filtration process of water in a tank for recreational and ornamental uses …"	USPTO	Published 2011-05-12	Tier 1 — public before the Teaming Agreement (2018-05-01)	Primary (the plaintiff's own application)
Crystal '361 · Ex. 3	US 2015/0166361 A1 (Fischmann; Crystal Lagoons (Curacao) B.V.), "System and method for maintaining water quality in large water bodies"	USPTO	Published 2015-06-18	Tier 1 — public before the Teaming Agreement (2018-05-01)	Primary (the plaintiff's own application)

Name in the charts	Document	Where published	Date proof	Date tier	Role
Crystal ’926 · Ex. 4	US 2017/0073926 A1 (Fischmann; Crystal Lagoons (Curacao) B.V.), "Suctioning device for large artificial water bodies"	USPTO	Published 2017-03-16	Tier 1 — public before the Teaming Agreement (2018-05-01)	Primary (the plaintiff’s own application)
Shehan ’173 · Ex. 5	US 2007/0196173 A1 (Bill C. Shehan), "Manmade island and methods"	USPTO	Published 2007-08-23	Tier 1 — public before the Teaming Agreement (2018-05-01)	Supporting (another inventor)
Slater ’213 · Ex. 6	US 9,476,213 B2 (Kelly Slater et al.; Kelly Slater Wave Company, LLC), "Wave generator system and method for free-form bodies of water"	USPTO	Issued 2016-10-25	Tier 1 — public before the Teaming Agreement (2018-05-01)	Supporting (another inventor)
Crystal ’744 · Ex. 7	US 2019/0236744 A1 (Fischmann; Crystal Lagoons), "Publicly accessible urban beach entertainment complex with a centerpiece man-made tropical-style lagoon …"	USPTO	Published 2019-08-01	Tier 2 — public before the alleged use (2022-02-01)	Supporting (the plaintiff’s own application)
Crystal ’260 · Ex. 8	US 10,724,260 B2 (Fischmann; Crystal Lagoons Technologies, Inc.), "Construction method for creating a restricted access swimming lagoon with beaches at a retail site"	USPTO	Issued 2020-07-28	Tier 2 — public before the alleged use (2022-02-01)	Supporting (the plaintiff’s own patent)

Primary = the plaintiff’s own publications from before the Teaming Agreement. Tier 1 documents were public before the complaint says any information reached the defendants’ side; tier 2 documents were public before the alleged use in 2022. Crystal Lagoons Technologies, Inc. is a plaintiff; Crystal Lagoons Corporation LLC and Crystal Lagoons (Curacao) B.V. are named as assignees on the documents.

6 Coverage

Key: E every part of the category shown · P some parts · C only by the primary documents read together · shaded columns = primary documents. Full key below.

Crystal Lagoons v. Martin Aquatic, Complaint — ¶ 45

Part	Crystal ’055	Crystal ’361	Crystal ’926	Crystal ’490	Primary together	Shehan ’173	Slater ’213	Crystal ’744	Crystal ’260
(a)(1)						E	P	P	P
(a)(2)									
(a)(3)	P	P			C				

Part	Crystal ’055	Crystal ’361	Crystal ’926	Crystal ’490	Primary together	Shehan ’173	Slater ’213	Crystal ’744	Crystal ’260
(a)(4)	P	P			P				
(b)	P		E	P	E				

E = that document’s quotations show every part of the pleaded category · P = some parts (a category with parts not found in public is never marked E) · shaded columns = primary documents; "Primary together" = the four primary documents read together. Marks are computed from the chart, part by part.

7 Charts

Crystal Lagoons v. Martin Aquatic, Complaint — ¶ 45

¶ 45. Each pleaded category is matched to a quoted passage in at least one of Crystal ’055, Crystal ’361, Crystal ’926 and Crystal ’490 (chart below). No single reference contains passages for every category. Whether and how the references combine is for counsel; the weakest match is stated in Section 8.

- **Crystal ’055**: the plaintiff’s 2008 patent: clay and bentonite walls and bottom under a PVC or polyethylene membrane, a pipe network with injectors every 10 m in the bottom, every sector of the bottom cleaned within 7 days ((a)(3), (a)(4), (b))
- **Crystal ’361**: the plaintiff’s 2015 application: walls sloped or vertical, at least about 45% in one embodiment; a liner of about 0.1–5 mm, thermo-fused or strip-attached ((a)(3), (a)(4))
- **Crystal ’926**: the plaintiff’s 2017 application: a reversible suction device on V-shaped brushes, boat-pulled, 25–70 ft per minute ((b))
- **Crystal ’490**: the plaintiff’s 2011 application: only the suction effluent is filtered; the device moved by boat, cart, robot or cable ((b))

Weakest point: (a)(2): no public document describes a manual cleaning chamber at the beach. (a)(1): before May 2018 the sloped beach edge appears only in other inventors’ documents; the plaintiff’s own edge slope is published from 2019.

Supporting references: Shehan ’173, Slater ’213, Crystal ’744, Crystal ’260.

Reference and location	Verbatim text
(a)(1) the beach edge design, specifications, and shape	
Shehan ’173 SUPPORTING Ex. 5 at 15 ¶ [0043]	“This form emulates the gradual sloping entry from an island into an ocean or sea, lake or other water body, via a 15-30 degree sloping ramp.”
IN PLAIN TERMS Tier 1, another inventor (2007): a gradual sloping entry from an island into an ocean, sea, lake or other water body, via a 15–30 degree sloping ramp. **Shows: specifications · shape**	
Shehan ’173 SUPPORTING Ex. 5 at 14 ¶ [0013]	“One embodiment of the formations defines a sloped beach area accomplished by a sloping concrete beach floor”
IN PLAIN TERMS Tier 1: in one embodiment, the sloped beach area is made with a sloping concrete beach floor. **Shows: beach edge design**	
Slater ’213 SUPPORTING Ex. 6 at 27 col. 5, ll. 62–63	“The shoal 206 can also be an extension of the slope 204 and terminate directly into a beach.”

Reference and location	Verbatim text
IN PLAIN TERMS Tier 1, a wave pool (2016): the shoal can extend the bottom slope and end directly in a beach. **Shows: shape**	
Crystal '744 SUPPORTING Ex. 7 at 24 ¶ [0071]	"the bathing zone 3 b is adjacent the zero-entry beach edge 3 a, wherein the zero-entry edge preferably resembles the natural, soft slope of a tropical beach or a natural lake."
IN PLAIN TERMS Tier 2, the plaintiff's own application (2019): a zero-entry beach edge that preferably resembles the soft slope of a tropical beach. **Shows: beach edge design · shape**	
Crystal '260 SUPPORTING Ex. 8 at 20 col. 11, ll. 22–23	"The slope of the zero-entry edge, is preferably between 5% and 30%."
IN PLAIN TERMS Tier 2, the plaintiff's own patent (2020): the zero-entry edge slope, preferably between 5% and 30%. **Shows: specifications**	
Crystal '260 SUPPORTING Ex. 8 at 17 col. 5, ll. 28–30	"a support slab (14) is provided underneath a portion of the sloped access (15), and the non-permeable material (13) allows containing the water body."
IN PLAIN TERMS Tier 2, the plaintiff's own patent (2020): a support slab under part of the sloped access, with the non-permeable material containing the water. **Shows: beach edge design**	
NOTE Before May 2018 the sloped beach edge appears in other inventors' documents — a man-made island entering open water, and a wave pool — not in an enclosed lagoon; the plaintiff's own documents state its edge shape and slope from 2019. Tier 2 documents count only against the alleged misuse in 2022.	
(a)(2) manual cleaning beach chamber design and specifications	
NOT FOUND IN PUBLIC manual cleaning beach chamber design · specifications. Not found in any public document searched (the plaintiff's patents and applications, full-text patent searches, press, and the archived company website). The "chambers" in the plaintiff's patents are a water-inlet chamber and a draining chamber for the suction effluent, not a cleaning chamber at the beach.	
(a)(3) wall design, specifications, and configurations	
Crystal '055 Ex. 1 at 17 col. 9, ll. 20–25	"The structure or pond according to the present invention includes bottoms and walls built with low permeability materials such as clay and bentonite, coated by a non-porous material, such as a polyvinyl chloride membrane, lineal low density polyethylene or high density polyethylene capable of being cleaned"
IN PLAIN TERMS Tier 1, the plaintiff's own patent (published 2008): bottoms and walls of low-permeability materials such as clay and bentonite, covered with a PVC or polyethylene membrane. **Shows: wall design**	
Crystal '055 Ex. 1 at 18 col. 12, ll. 22–23	"The walls were built in cement and clay and lined with LLDPE and HDPE membranes."
IN PLAIN TERMS Tier 1: the built example — walls of cement and clay, lined with LLDPE and HDPE membranes. **Shows: wall design**	
Crystal '361 Ex. 3 at 8 ¶ [0027]	"The walls of the water body may be sloped or vertical."

Reference and location	Verbatim text
IN PLAIN TERMS Tier 1 (2015): the walls may be sloped or vertical. **Shows: configurations**	
Crystal '361 **Ex. 3 at 8** *¶ [0027]*	"In an embodiment, the slope of the walls is no less than about 45% in order to avoid attachment of settling solids, debris, or other impurities on the walls."
IN PLAIN TERMS Tier 1: in one embodiment, wall slope of at least about 45%, so settling solids do not attach to the walls. **Shows: specifications**	
NOTE The 2008 patent also allows cement walls with coatings as an option; the plaintiff's own built example used cement and clay.	
(a)(4) water piping and liner installation layout, design, and specifications	
Crystal '361 **Ex. 3 at 8** *¶ [0024]*	"The non-porous flexible material preferably comprises a liner, such as a membrane or plastic liner, and may have a thickness in the range of about 0.1 mm to about 5 mm"
IN PLAIN TERMS Tier 1 (2015): the liner may be about 0.1 mm to about 5 mm thick. **Shows: specifications**	
Crystal '361 **Ex. 3 at 8** *¶ [0025]*	"The non-porous material can be thermo fused, or an extruded HDPE concrete embedment strip can be used for liner attachment"
IN PLAIN TERMS Tier 1: the liner can be thermo-fused, or attached with an extruded HDPE concrete embedment strip. **Shows: liner installation layout**	
Crystal '055 **Ex. 1 at 18** *col. 12, ll. 28–31*	"The system has homogeneously distributed injectors every 10 meters around the entire lagoon that are placed in the bottom to inject the products and maintain water homogeneity."
IN PLAIN TERMS Tier 1 (2008): injectors every 10 metres around the whole lagoon, placed in the bottom. **Shows: water piping**	
Crystal '055 **Ex. 1 at 17** *col. 9, ll. 56–57*	"The structure has a pipe network with injectors that allow an efficient application of the products and water homogenization."
IN PLAIN TERMS Tier 1: the structure has a pipe network with injectors, for applying the products and keeping the water homogeneous. **Shows: water piping**	
NOT FOUND IN PUBLIC design. Not shown as such: no public document gives the design of the piping or liner as built on a project. The documents give the liner materials (under (a)(3)), its thickness and attachment, and the injector network and spacing (above).	
(b) bottom cleaning system processes, designs, and specifications	
Crystal '490 **Ex. 2 at 14** *¶ [0060]*	"covering the tank bottom with a suctioning device, which suctions a water flow with flocculated particles and discharges a collecting line of effluent"
IN PLAIN TERMS Tier 1 (2011): a suction device covers the tank bottom and draws off the flocculated particles. **Shows: bottom cleaning system processes**	
Crystal '490 **Ex. 2 at 14** *¶ [0084]*	"That is to say, instead of filtering all the water with traditional systems, only the effluent flow from the suctioning device is filtered."

Reference and location	Verbatim text
IN PLAIN TERMS Tier 1: only the water the suction device draws in is filtered, not the whole volume. **Shows: bottom cleaning system processes**	
Crystal '926 **Ex. 4 at 9** *¶ [0024]*	"a plurality of first brushes, where in an embodiment the first brushes are V-shaped brushes configured to direct a bottom water flow into apexes of the V-shaped brushes"
IN PLAIN TERMS Tier 1 (2017): V-shaped brushes that steer the bottom water to suction points at their apexes. **Shows: designs**	
Crystal '926 **Ex. 4 at 11** *¶ [0044]*	"where the suctioning device is reversible and is supported by a plurality of brushes"
IN PLAIN TERMS Tier 1: the device is reversible and rides on brushes. **Shows: designs**	
Crystal '490 **Ex. 2 at 14** *¶ [0080]*	"On the other hand, in step c) of the present invention, when the tank bottom is covered with the suctioning device, this can be moved by different means of traction such as a boat in the tank surface; a locomotive cart on rails in the tank bottom; a motorized, automated and/or remote-controlled robot; or with a cable and pulley system."
IN PLAIN TERMS Tier 1 (2011): the device can be moved by a boat, a cart on rails, a robot, or a cable and pulley. **Shows: bottom cleaning system processes**	
Crystal '926 **Ex. 4 at 16** *¶ [0089]*	"The suctioning device was attached to a boat with an engine through two metal arms, which allowed driving the suctioning device through the bottom of the large water body."
IN PLAIN TERMS Tier 1: in the worked example, a boat pulls the device by two metal arms. **Shows: bottom cleaning system processes**	
Crystal '055 **Ex. 1 at 16** *col. 8, ll. 35–37*	"Cleaning is performed in such a way that every sector of the lake is cleaned in time intervals no greater than 7 days, preferably every 4 days."
IN PLAIN TERMS Tier 1 (2008): every sector cleaned at least every 7 days, preferably every 4. **Shows: specifications**	
Crystal '926 **Ex. 4 at 13** *¶ [0072]*	"The device of the invention allows covering large surface areas in short time, and is able to move at a speed of about 25 ft per minute, 30 ft per minute, 40 ft per minute, 50 ft per minute, or about 60 ft per minute, or about 70 ft per minute."
IN PLAIN TERMS Tier 1 (2017): device speeds of about 25 to 70 ft per minute. **Shows: specifications**	

Every quotation above was checked by script against the saved text of the cited document before this report was generated; a quotation not found verbatim is refused. The script also checks that each pleaded category is printed exactly as it appears in the complaint, and that every part of it is either shown by at least one citation or listed as not found in public.

Sources quoted

Exhibits 1–8 accompany this report, each stamped "Ex. N – p. k of n"; all are the official USPTO prints. Chart cites refer to the stamped pages.

- `P055` (Ex. 1) — US 7,820,055 B2 (Fernando Benjamin Fischmann; Crystal Lagoons Corporation LLC), "Process to maintain large clean recreational water bodies", filed 2007-06-25, first published 2008-05-22 as US 2008/0116142 A1, issued 2010-10-26

https://patents.google.com/patent/US7820055B2/en

- P490 (Ex. 2) — US 2011/0108490 A1 (Fernando Benjamin Fischmann; Crystal Lagoons), "Efficient filtration process of water in a tank for recreational and ornamental uses, where the filtration is performed over a small volume of water and not over the totality of the water from the tank", published 2011-05-12 https://patents.google.com/patent/US20110108490A1/en
- P361 (Ex. 3) — US 2015/0166361 A1 (Fernando Benjamin Fischmann; Crystal Lagoons (Curacao) B.V.), "System and method for maintaining water quality in large water bodies", published 2015-06-18 https://patents.google.com/patent/US20150166361A1/en
- P926 (Ex. 4) — US 2017/0073926 A1 (Fernando Benjamin Fischmann; Crystal Lagoons (Curacao) B.V.), "Suctioning device for large artificial water bodies", published 2017-03-16 https://patents.google.com/patent/US20170073926A1/en
- P173 (Ex. 5) — US 2007/0196173 A1 (Bill C. Shehan), "Manmade island and methods", published 2007-08-23 https://patents.google.com/patent/US20070196173A1/en
- P213 (Ex. 6) — US 9,476,213 B2 (Kelly Slater et al.; Kelly Slater Wave Company, LLC), "Wave generator system and method for free-form bodies of water", issued 2016-10-25 https://patents.google.com/patent/US9476213B2/en
- P744 (Ex. 7) — US 2019/0236744 A1 (Fernando Benjamin Fischmann; Crystal Lagoons), "Publicly accessible urban beach entertainment complex with a centerpiece man-made tropical-style lagoon …", published 2019-08-01 https://patents.google.com/patent/US20190236744A1/en
- P260 (Ex. 8) — US 10,724,260 B2 (Fernando Benjamin Fischmann; Crystal Lagoons Technologies, Inc.), "Construction method for creating a restricted access swimming lagoon with beaches at a retail site", issued 2020-07-28 https://patents.google.com/patent/US10724260B2/en

8 Open points

Point	Detail	Assessment
Counts the report bears on	A showing that information was public bears on whether it is a trade secret (counts I and II). It does not bear on the contract, good-faith, misrepresentation or interference counts (III–VII).	Limits the report to counts I–II
The combination	A set of public pieces can still be claimed as a protectable combination. The plaintiff's 2008 patent states the structure, liner, injectors, skimmers and suction cleaning together, in one document; whether that answers a combination claim is for counsel.	The point most open to dispute
Ranges and examples, not build specifications	The patents give preferred ranges (slopes, thicknesses, intervals) and worked examples. The specifications actually used on a given project are not public; whether the published ranges disclose the "specifications" pleaded is for counsel.	Partly shown
The beach edge before 2018	Before the Teaming Agreement the sloped beach edge is shown only in other inventors' documents: a man-made island in open water and a wave pool. The plaintiff's own edge slope (5% to 30%) and support slab are published from 2019.	Tier 1 by others; tier 2 by the plaintiff
Options the patents also allow	The plaintiff's 2008 patent also allows cement walls with coatings, and its built example used cement and clay walls. The 2019 application says the lagoon typically has no swimming-pool concrete bottom over most of its area.	For counsel

Point	Detail	Assessment
Categories not charted	(c)(1) cost and timing, (c)(2) engineering drawings and schematics for particular projects, and (d)–(h) development process, suppliers, customers, pricing, client analyses and market strategy. Patent figures show general layouts, not project drawings.	Not addressed by a documents search

9 What was not found, and how hard we looked

Searched for and not found in any public source: a manual cleaning chamber at the beach (¶ 45(a)(2)); the materials and dimensions of the plaintiff's beach edge before 2019.

Seen but not charted: a 2014 Florida Trend article describing the lagoon area "lined with a light-colored plastic liner" and debris removed by "a vacuuming device" (the archived copy is a subscription teaser); a 2017 Jacksonville Daily Record article on a Crystal Lagoons project (a "white lining" and a sand beach). Both repeat what the patents state.

10 Search record

The searches for this sample were run by hand against the sources below, after the complaint was read and its categories broken into parts.

Source	Coverage	Result
USPTO full text and Google Patents	Crystal Lagoons and its founder's patents and applications; lagoon liners, walls, piping and bottom cleaning; zero-entry and sloped beach edges; cleaning chambers at a beach	Eight documents charted; two family members and one other set aside
Archived company websites	crystallagoons.com and crystal-lagoons.com, 2012–2018	Marketing pages only; nothing citable
Press	Trade and local press on Crystal Lagoons projects, 2014–2018	Two articles seen; not charted

A record of each search is kept on file.

11 Limitations and basis

- This sample charts the technical categories pleaded in ¶ 45 of the Complaint in a closed case. It is not an opinion on whether any information was a trade secret, was misappropriated, or was protected by contract.
- Each quotation is verbatim from the document cited and was checked by script against the saved text. Locations are column and line for granted patents and paragraph number for published applications; every charted document was read in full.
- Dates are publication dates shown on the document or its official record.
- Prepared without charge, for publication as a sample; unsigned.

Appendix A — the identification as pleaded

Complaint (Dkt. 1) ¶ 45

45. Crystal Lagoons' trade secret information, which is not generally known or readily ascertainable, includes the following categories of information (collectively, the "Trade Secrets"): a. "Lagoon Structure Information" include without limitation: 1) the beach edge design, specifications, and shape, 2) manual cleaning beach chamber design and specifications, 3) wall design, specifications, and configurations, and 4) water piping and liner installation layout, design, and specifications. b. "Lagoon System Information" include without limitation bottom cleaning system processes, designs, and specifications. c. "Lagoon Engineering Design Information" include without limitation: 1) cost and timing information, and 2) engineering drawings and schematics. d. "Lagoon Development Information" include without limitation confidential information about the 1) process and timing of planning and development of a project, and 2) technical assistance process information. e. "Supplier and Vendor Information" include without limitation, confidential information about 1) equipment suppliers, pricing (including pricing quotes), and specifications, and 2) technical vendors including engineering, architecture, construction, and similar firms. f. "Customer Information" include without limitation: 1) identity of clients, 2) pricing and royalty information, and 3) confidential terms and conditions of Crystal Lagoons' contracts with its clients. g. "Client Strategic Information" include without limitation: 1) analysis performed for client projects related to potential visitors, spreadsheets, revenue analysis and similar documents, and 2) activity information related to a lagoon project and suggestions as to how to activate the lagoon project, and PAL™ concept analysis of revenues based on tickets, visitors, and/or activation of the lagoon. h. "Market Strategy Information" includes information and analyses related to the artificial lagoon market, cost data and information, and benchmark information.

Appendix B — near misses

Reference	Why it was set aside	Where to check
US 8,062,514 B2 and US 8,070,942 B2 (Crystal Lagoons, 2011)	Same family and description as Crystal '055; their claims cover the structure (skimmers and injector piping "along the border") and the suction device. Not charted separately.	https://patents.google.com/patent/US8062514B2/en
US 7,811,177 B2 (Water Ride Concepts, 2010)	Floating marine park with a "zero-entry beach access"; no slope or construction detail.	https://patents.google.com/patent/US7811177B2/en

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Trade secrets — *Complaint search* (up to 8 categories, before the identification): $1,500 · *Identification chart*: quoted, from $3,000 · *Full public-domain report*: quoted, from $6,000. Introductory pricing for our trade-secret practice.
Invalidity — *Examiner-assisted search* (one claim at full depth): $999, 5 business days · *Focused invalidity search* (every independent claim, charted and signed): $2,500, 5 business days · *Full invalidity search* (every asserted claim with dependents): $5,000, 10 business days.
Prosecution — *Pre-filing search*: $900 · office actions: *Verification* $750, *Scope check* $750, *Drafted response* $1,400.
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