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June 11, 2026

The Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street, S.W., Room 112
Washington, DC 20436

Re: *Certain Heavy Machinery and Components Thereof*, Dkt. No. 3910, First
Supplement to Complaint

Dear Secretary Barton:

I write to clarify and supplement certain aspects of Caterpillar Inc.'s Complaint based on discussions with the OUII Staff.

- At the end of the Exhibit Table, on page vii, add the following entry:

101	Excerpts from ImportGenius Records (May 19, 2026)
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- In paragraph 76, reproduced below, insert the underlined sentence:

“Compact track loaders and skid-steer loaders accused of infringing the ’637 Patent are also manufactured abroad. For example, a 2025 Doosan Company Profile showed that compact track loaders and skid-steer loaders were manufactured in China, the Czech Republic, and India, and were slated to be manufactured in Mexico beginning in 2026. Attached as Exhibit 101 are excerpts of import records reflecting that Doosan Bobcat India Private Ltd. sells for importation into the United States products subject to the requested investigation.”

Attached please find Exhibit 101 to the Complaint. Thank you for your attention to this matter.

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Respectfully submitted,

/s/ Paul F. Brinkman

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