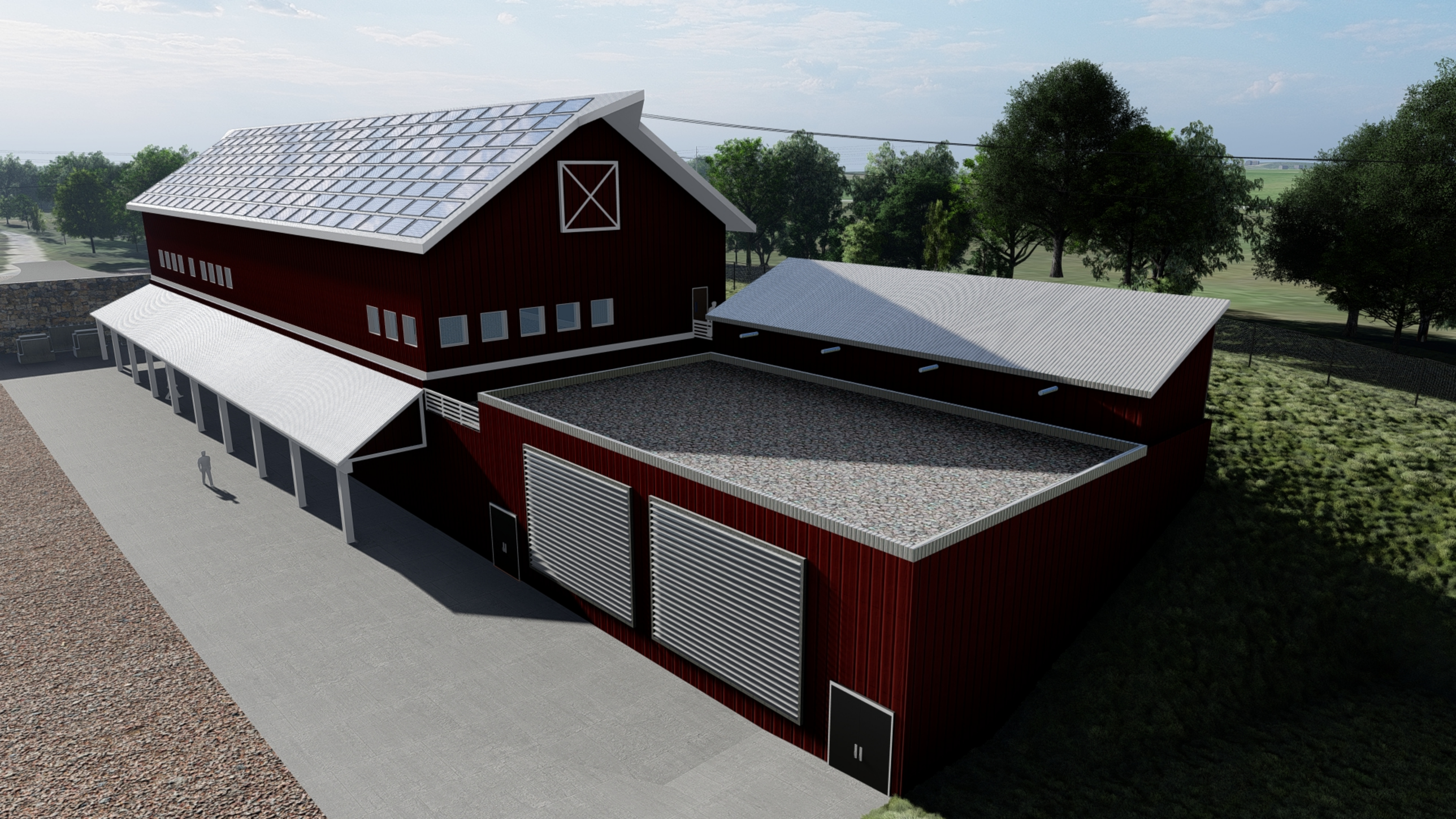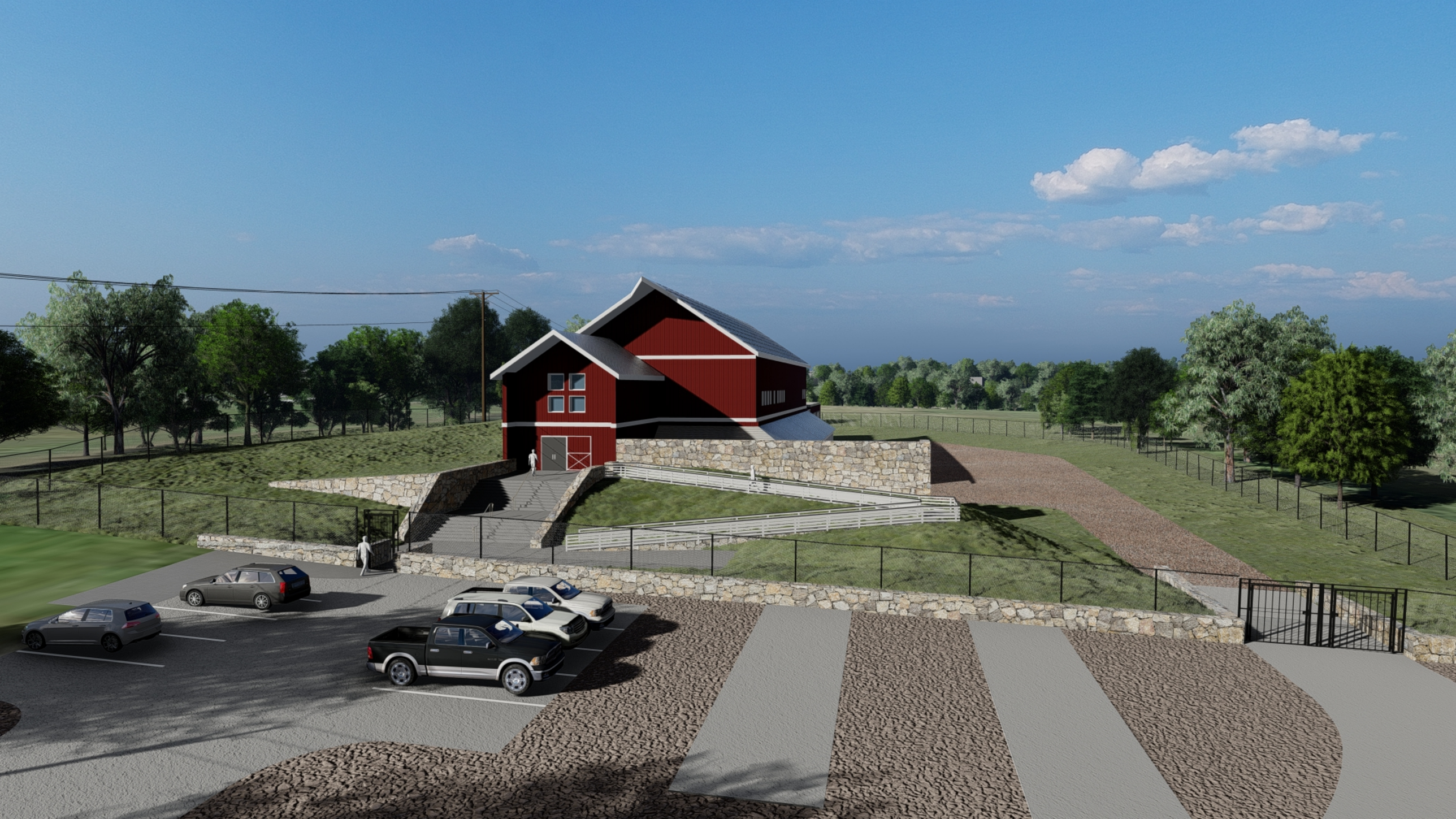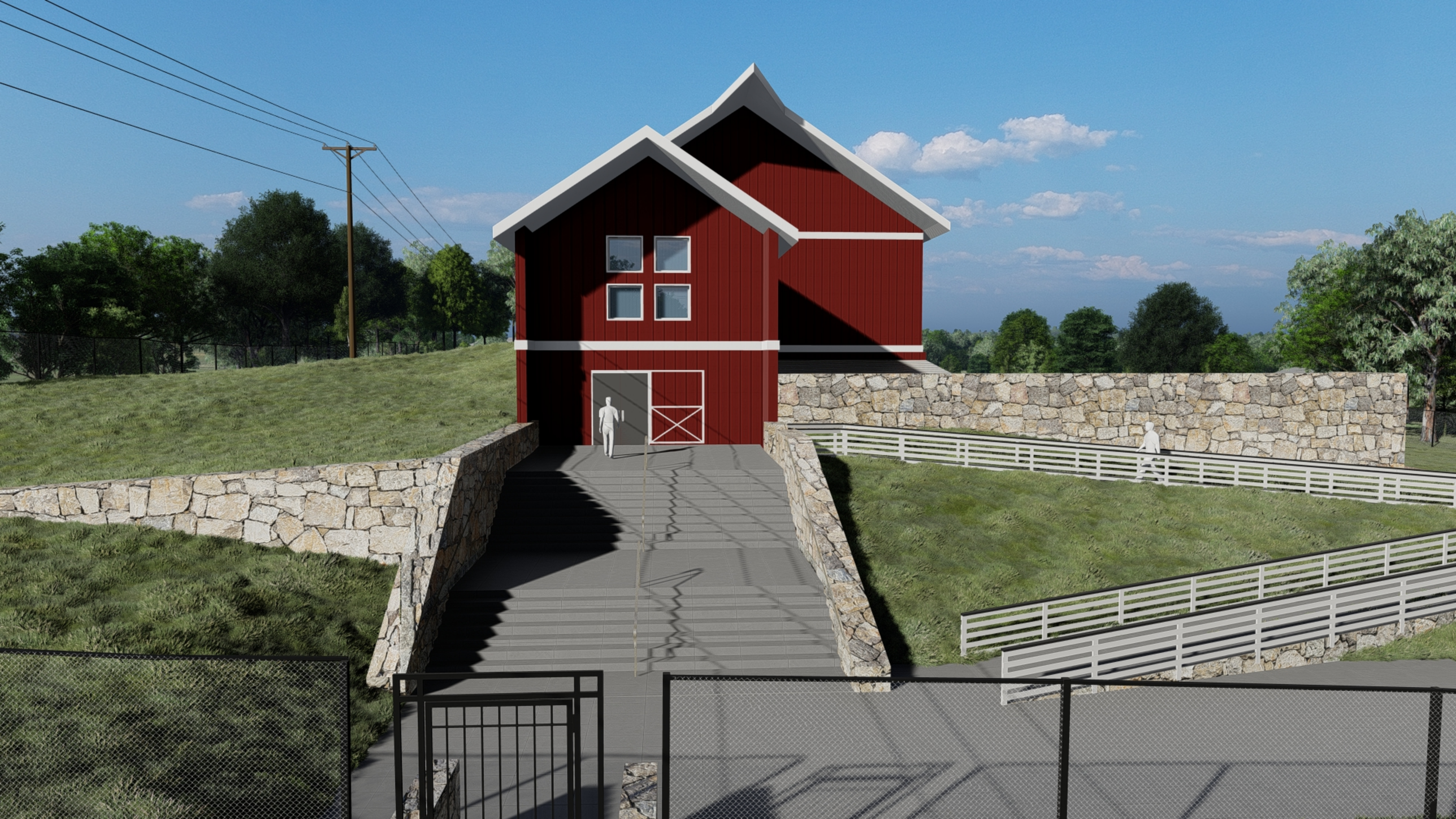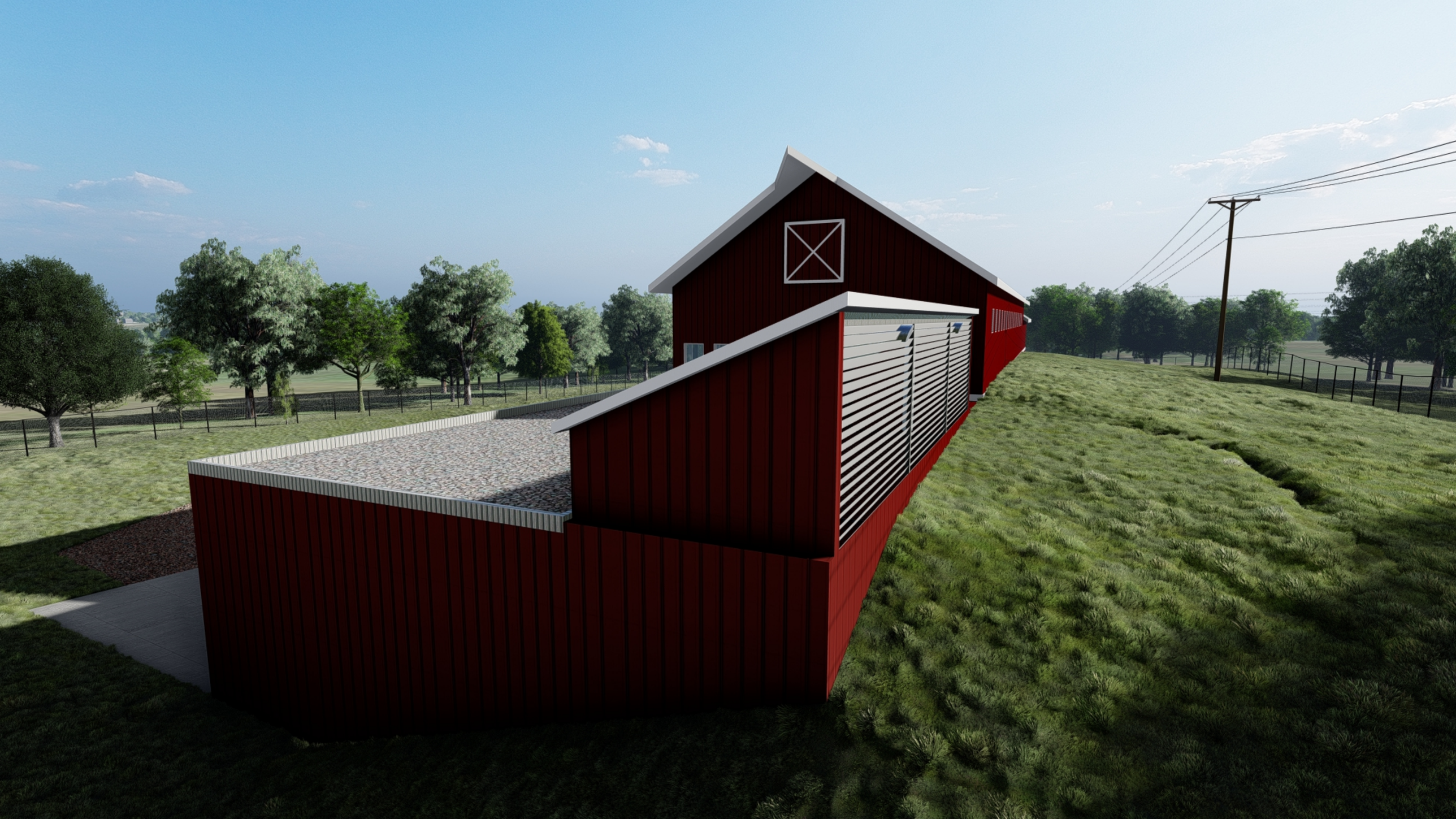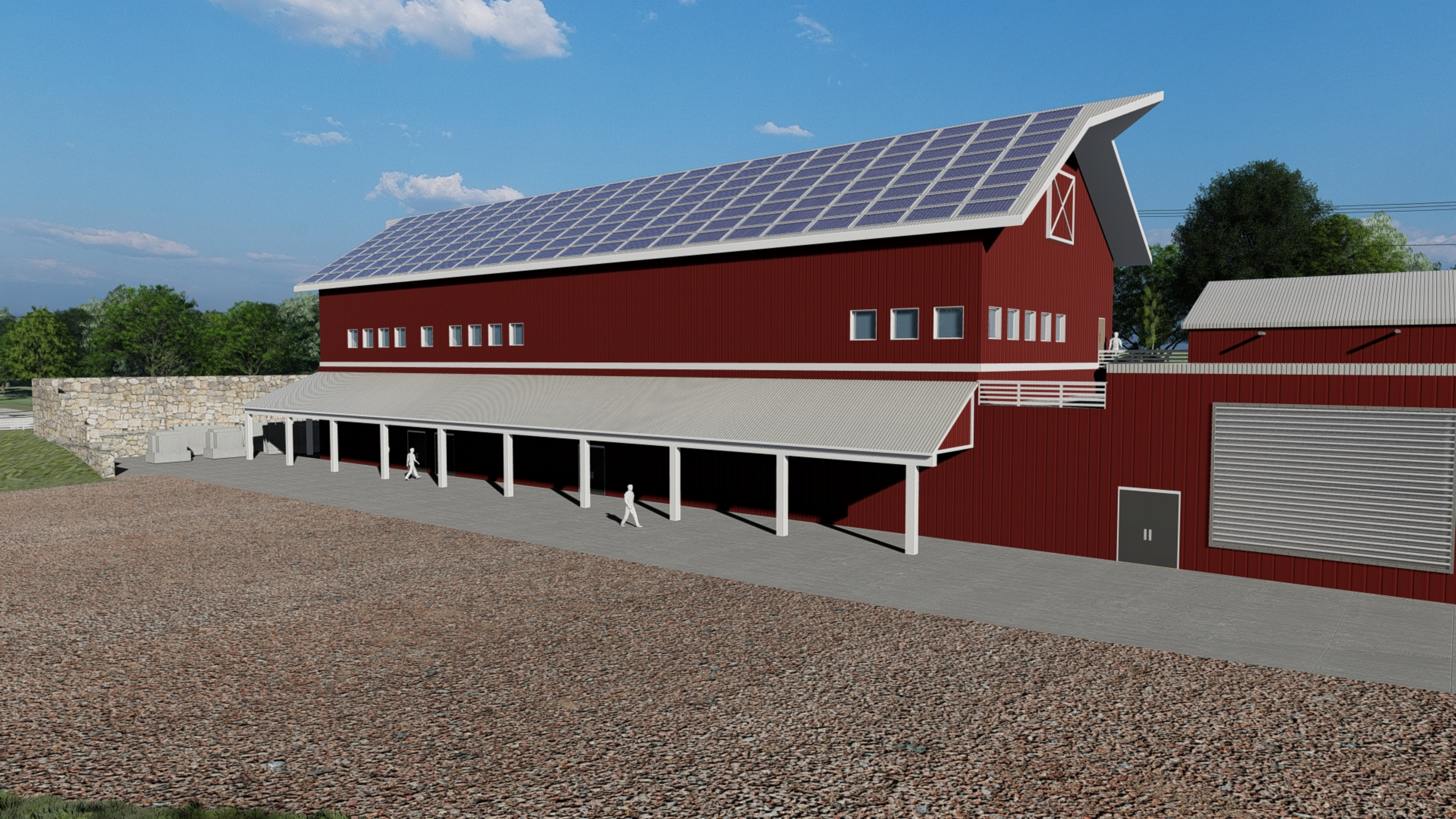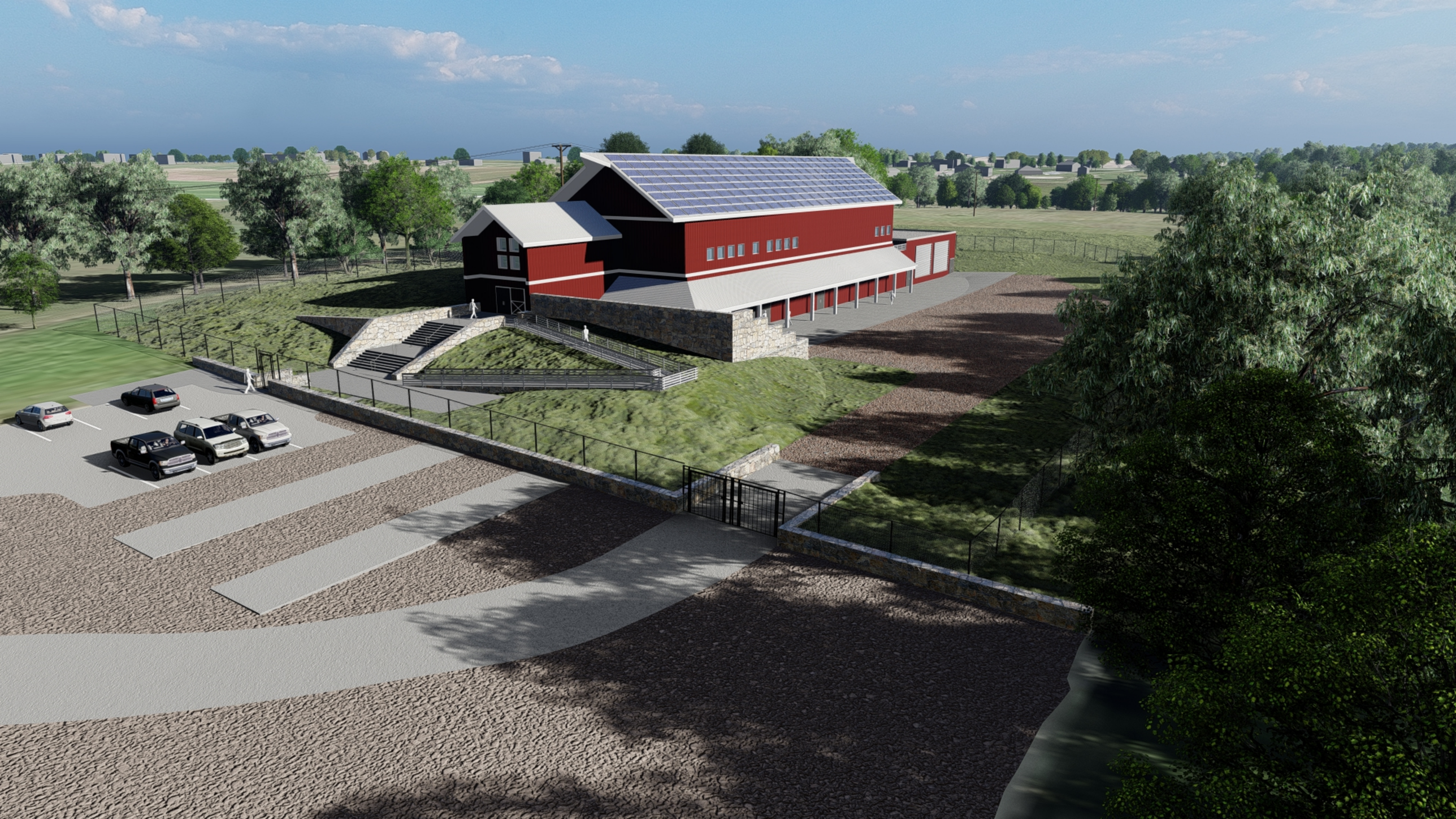Exhibit Petitioner PWL-3