

2022 WINTER NEWSLETTER

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1201 NEW YORK AVENUE, N.W.
WASHINGTON, D.C.

U.S. COURT OF APPEALS FOR THE FEDERAL CIRCUIT

CALIFORNIA INSTITUTE OF TECHNOLOGY V. BROADCOM LTD.

2022 U.S.P.Q.2d 130 (Fed. Cir. 2022)

By: Gene M. Garner II, Partner

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Broadcom Limited, Broadcom Corporation, and Avago Technologies Ltd. (collectively “Broadcom”) and Apple, Inc. (“Apple”) appealed to the United States Court of Appeals for the Federal Circuit (“CAFC”) from an adverse decision in the District Court for the Central District of California in an infringement suit filed by the California Institute of Technology (“Caltech”) for infringement of U.S. Patents No. 7,116,710 (“the ‘710 patent”), No. 7,421,032 (“the ‘032 patent”), and No. 7,916,781 (“the ‘781 patent”).

On February 4, 2022, the CAFC affirmed in part, vacated in part, and remanded to the district court.

Background

On May 26, 2016, Caltech sued Broadcom and Apple alleging infringement under 35 USC 271 by Broadcom’s wireless chips and Apple’s products which included Broadcom’s chips.

The Caltech patents at issues related to circuits that generate and receive irregular repeat and accumulate (“IRA”) codes, which are error correction codes that improve speed and reliability of data transmissions. In the ‘710 and ‘032 Caltech patents, the IRA codes are encodable and decodable in linear time rather than in quadratic time. Such linear time encoding/decoding minimizes the number of calculations that must be performed and leads to smaller, more efficient and lower power chips.

Caltech alleged that Broadcom and Apple infringed claims 20 and 22 (reciting a “coder”) of Caltech’s ‘710 patent, and claims 11 and 18 (respectively reciting “an encoder” and “a decoder”) of Caltech’s ‘032 patent. These claims require irregular repetition, that is repetition of groups of information bits an irregular number of times.

In its brief, Broadcom presented an example of an operation of an AND gate, in which input 1 is an information bit at logic 0 or 1, input 2 is a parity-check bit at logic 0 or 1, and the output is logic 0 in all cases except when both the information bit and the parity-check bit are logic 1 (in which case the output is logic 1).

Pre-trial Proceedings

In pre-trial proceedings, Apple filed inter partes review (IPR) petitions which challenged the validity of the claims at issue, and the U.S. Patent Trial and Appeal Board (“PTAB”) decided that Apple failed to show that the claims were unpatentable as obvious.

Also in pre-trial proceedings, the district court conducted a *Markman* hearing, in which the district court construed the claim limitation “repeat” to have its plain and ordinary meaning and “noted that the repeated bits ‘are a construct distinct from the original bits from which they are created,’ but that they need not be generated by storing new copied bits in memory”.

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Trial at the District Court

The district court found infringement by Broadcom and Apple of claims 20 and 22 of the Caltech ‘710 patent and claims 11 and 18 of the Caltech ‘032 patent. During trial, the district court clarified and instructed the jury that the term “repeat” meant “generation of additional bits, where generation can include, for example, duplication or reuse of bits”. Broadcom and Apple argued that the chips “did not repeat information bits at all, much less irregularly” and, thus, did not infringe the Caltech ‘710 and ‘032 patents. The jury found infringement of the asserted claims; Broadcom and Apple filed post-trial motions for JMOL and a new trial. The district court denied JMOL based on the district court finding no error in its claim construction ruling and concluding that the verdict was supported by substantial evidence.

In addition, Caltech accused Broadcom and Apple of infringing claim 13 of Caltech’s ‘781 patent, which claims a method for “creating codewords in which ‘information bits appear in a variable number of subsets’”. The district court did not instruct the jury that “the claim term ‘variable number of subsets’ requires irregular information bit repetition” as determined at the summary judgment stage. The jury determined that Broadcom and Apple infringed claim 13 of Caltech’s ‘781 patent. Broadcom and Apple filed JMOL and new trial motions, asserting that “the district court erred in refusing their requested instruction and that JMOL of noninfringement was appropriate because the irregular repetition requirement was not satisfied”.

Further, Caltech proposed a two-tier damages theory in which Caltech would be awarded different amounts of damages by Broadcom and by Apple for their respective infringement.

At issue on appeal before the CAFC were the following:

- (1) claim construction of the term “repeat” recited in claims of the ‘710 and ‘032 patents;
- (2) patent-eligibility and infringement of claim 13 of the ‘781 patent
- (3) validity and IPR estoppel;
- (4) inequitable conduct;
- (5) damages, including extraterritoriality

Arguments

Claim Construction of the term “repeat” of the ‘710 and ‘032 patents

Broadcom and Apple argued that the accused AND gates do not “repeat” information bits as claimed in the ‘710 and ‘032 patents, but instead combine the information bits with parity-check bits to output new bits from the AND gates. Moreover, Broadcom and Apple argued that the district court erroneously construed “repeat”. In addition, Broadcom and Apple argued that the AND gates output the same number of bits for every information bit and, thus, do not generate bits “irregularly”.

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In response, Caltech argued that every information bit is repeated an irregular number of times in that “every bit in the stream of information bits is fed by wire simultaneously to the information inputs of *all* 972 AND gates and that at any time, at least 3 and up to 12 of those AND gates will be enabled to *repeat that bit* at the output of the AND gates.”

The CAFC agreed with Caltech that “the plain claim language requiring repeating information bits does not require generating new, distinct bits and that the district court was correct in constructing the term to not exclude the reuse of bits.” The CAFC also affirmed the district court’s denial of JMOL.

Patent eligibility and infringement of claim 13 of the ‘781 patent

Broadcom and Apple argued that claim 13 of Caltech’s ‘781 patent was not patent eligible under 35 U.S.C. 101 because it depends on mathematical operations.

In response, Caltech argued that claim 13 recites a patent eligible method of performing error correction and detection encoding with the requirement of irregular repetition as the claim limitation “variable number of subsets” requires irregular information bit repetition.

The CAFC held that claim 13 claims more than a mathematical formula because “it is directed to an efficient, improved method of encoding data that relies in part on irregular repetition”. The CAFC remanded the issue of infringement of claim 13 of the ‘781 patent to the district court and further held that “the district court must instruct the jury as to the proper construction of the claim limitation ‘variable number of subsets’”.

Validity and IPR estoppel

At the district court, Broadcom and Apple were barred from presenting an invalidity case at trial on the ground of statutory estoppel. Broadcom and Apple attempted to challenge the validity of the patents by relying on grounds that the PTAB did not address in its IPR decisions. The district court barred by estoppel the Broadcom and Apple challenges because “Broadcom and Apple were aware of prior art references at the time they filed their IPR petitions and reasonably could have raised the prior art references in their IPR petitions even if they could not have been raised in the proceedings post-institution.”

The CAFC overruled a prior CAFC decision in *Shaw Industries Group, Inc. v. Automated Creel Systems, Inc.*, 817 F.3d 1293, 1300 (Fed. Cir. 2016) and clarified that “estoppel applies not just to claims and ground asserted in the petition and instituted for consideration by the Board, but to all claims and grounds not in the IPR but which reasonably could have been included in the petition”. The CAFC affirmed the district court’s decision barring Broadcom and Apple from raising invalidity challenged based on prior art references which could have been raised in the their IPR petitions.

U.S. COURT OF APPEALS FOR THE FEDERAL CIRCUIT

CALIFORNIA INSTITUTE OF TECHNOLOGY V. BROADCOM LTD.**2022 U.S.P.Q.2d 130 (Fed. Cir. 2022) (Cont.)**Inequitable Conduct

The CAFC affirmed the district court's grant of summary judgment of no inequitable conduct based on undisclosed prior art as "inequitable conduct requires a showing that undisclosed prior art was but-for material to the PTO's decision of patentability" (*Therasense, Inc. v. Becton, Dickinson and Co.*, 649 F.3d 1276, 1291 (Fed. Cir. 2011)).

Damages, including extraterritoriality

The CAFC vacated the damages award by the district court and remanded for a new trial on damages as the CAFC asserted that Caltech's two-tier damages theory is legally unsupportable on the record. Moreover, Broadcom and Apple argued that the damages verdict had improperly included extraterritorial sales from Broadcom's international affiliates. However, the CAFC asserted that the dispute between the parties is whether the relevant transactions were domestic or extraterritorial, not whether infringement applies domestically or extraterritorially. The CAFC further asserted that "the district court's jury instruction emphasized the key question of whether there were such substantial activities in the United States, an instruction that Apple and Broadcom do not contest."

Decision by the CAFC

The CAFC affirmed the district court's construction of the claim limitation "repeat", affirmed the district court's denial of a JMOL (Judgement as a Matter of Law) on infringement of the asserted patent claims of the '710 and '032 patents, affirmed the district court's conclusion that claim 13 of the '781 patent is patent-eligible, vacated the jury's verdict of infringement of claim 13 of the '781 patent and remanded to the district court for a new trial, affirmed the district court's summary judgement findings of no invalidity based on IPR estoppel and no inequitable conduct, affirmed the district court's jury instructions relating to extraterritoriality, and vacated the jury's damage award and remanded to the district court for a new trial on damages.

Analysis

Care should be exercised to raise all prior art references in an IPR petition and to consider carefully infringement based on plain claim language.

U.S. COURT OF APPEALS FOR THE FEDERAL CIRCUIT

TRAVEL SENTRY, INC. V. TROPP **2022 U.S.P.Q.2d 155 (Fed. Cir. 2022)**

By: Gene M. Garner II, Partner

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TRAVEL SENTRY, INC., Plaintiff-Appellee v. DAVID A. TROPP, Defendant-Appellant; DAVID A. TROPP, Plaintiff-Appellant v. CONAIR CORPORATION, HP MARKETING CORP., LTD., MAGELLAN'S INTERNATIONAL TRAVEL CORPORATION, TITAN LUGGAGE USA, TRG ACCESSORIES, LLC, Defendants BRIGGS & RILEY TRAVELWARE LLC, DELSEY LUGGAGE INC., L.C. INDUSTRIES, LLC, OUTPAC DESIGNS INC., TRAVELPRO INTERNATIONAL INC., VICTORINOX SWISS ARMY, INC., WORDLOCK, INC., Defendants-Appellees

In an unpublished or nonprecedential decision on February 14, 2022, the Court of Appeals for the Federal Circuit (CAFC) affirmed a decision by the United States District Court for the Eastern District of New York that all at-issue claims of U.S. Patent Nos. 7,021,537 (“the ‘537 patent”) and 7,063,728 (“the ‘728 patent”) are invalid as claiming ineligible subject matter under 35 U.S.C. 101.

Background

The parties agreed that claims 1 of the ‘537 patent is representative of all claims at-issue:

1. A method of improving airline luggage inspection by a luggage screening entity, comprising: making available to consumers a special lock having a combination lock portion and a master key lock portion, the master key lock portion for receiving a master key that can open the master key lock portion of this special lock, the special lock designed to be applied to an individual piece of airline luggage, the special lock also having an identification structure associated therewith that matches an identification structure previously provided to the luggage screening entity, which special lock the luggage screening entity has agreed to process in accordance with a special procedure, marketing the special lock to the consumers in a manner that conveys to the consumers that the special lock will be subjected by the luggage screening entity to the special procedure, the identification structure signaling to a luggage screener of the luggage screening entity who is screening luggage that the luggage screening entity has agreed to subject the special lock associated with the identification structure to the special procedure and that the luggage screening entity has a master key that opens the special lock, and the luggage screening entity acting pursuant to a prior agreement to look for the identification structure while screening luggage and, upon finding said identification structure on an individual piece of luggage, to use the master key previously provided to the luggage screening entity to, if necessary, open the individual piece of luggage.

The district court summarized that claim 1 “essentially describe(s) the basic steps of using and marketing a dual-access lock for luggage inspection, a long-standing fundamental economic practice and method of organizing human activity” and held representative claim 1 ineligible as directed to an abstract idea based on *Intellectual Ventures I LLC v. Symantec Corp.*, 838 F.3d 1307, 1313 (Fed. Cir. 2016).

U.S. COURT OF APPEALS FOR THE FEDERAL CIRCUIT

TRAVEL SENTRY, INC. V. TROPP

2022 U.S.P.Q.2d 155 (Fed. Cir. 2022) (Cont.)

The CAFC also asserted that the district court had properly held that “Mr. Tropp identified ‘no inventive concept’ in the claim’s details” including the recitation of “special lock”.

Arguments

Mr. Tropp argued that “claim 1 is directed to ‘the creation of novel physical locks with a uniform master key (that works with a variety of locks that have different locking mechanisms).’”

The CAFC asserted that Mr. Tropp’s argument would raise two substantial questions of eligibility under 35 USC 101 which were not raised by Mr. Tropp and therefore were not addressed by the CAFC:

(1) “Does the claim, properly construed, require a dual-access lock in which the key for the master-key lock portion is the same for different combination-lock mechanisms?”

(2) “And if so, could the claim pass muster under § 101 in the absence of anything in the specification, or even in the summary judgment record, that provides details regarding the physical makeup, mechanism, or operation of such a lock indicating a concrete technical advance over earlier dual-access locks?”

In presenting these questions of eligibility, the CAFC refers to *Affinity Labs of Tex., LLC v. DIRECTV, LLC*, 838 F.3d 1253, 1258-59 (Fed. Cir. 2016) (holding invalid under § 101 a claim that “is drawn to the [abstract] idea itself” instead of “how to implement” it and noting that “[e]ven if all the details contained in the specification were imported into the [patent] claims, the result would still not be a concrete implementation of the abstract idea”); *Apple, Inc. v. Ameranth, Inc.*, 842 F.3d 1229, 1241 (Fed. Cir. 2016).

In opposing the 101 summary judgement, Mr. Tropp further referenced the “special lock having a combination lock portion and a master key lock portion” and the “identification structure” as the claimed “physical components”.

The CAFC also focused on arguments that Mr. Tropp could have raised but did not, and, thus, the CAFC declined to address. For example, the CAFC noted that “Nothing in the opposition argued that the inventive concept in the claims was, or included, the creation of a new dual-access lock with a master key capable of opening dual-access locks whose combination-lock mechanisms differed from one another”.

Decision by the CAFC

The CAFC affirmed the district court’s decision that all at-issue claims of U.S. Patent Nos. 7,021,537 (“the ‘537 patent”) and 7,063,728 (“the ‘728 patent”) are invalid as claiming ineligible subject matter under 35 U.S.C. 101.

U.S. COURT OF APPEALS FOR THE FEDERAL CIRCUIT

TRAVEL SENTRY, INC. V. TROPP
2022 U.S.P.Q.2d 155 (Fed. Cir. 2022) (Cont.)

Analysis

The CAFC raised several potential arguments that perhaps could have been raised but were not raised or were not raised at appropriate times. In doing so, the CAFC inferred that these arguments could have been a factor in whether the CAFC affirmed or would remand or overturn the district court's decision of invalidity.

Moreover, this case is also a reminder that issues of eligibility under 35 USC 101 apply to the mechanical arts.





USPTO NEWS

USPTO Fiscal Year 2021 Performance and Accountability Report

By: Gene M. Garner II, Partner

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The United States Patent and Trademark Office (USPTO) Fiscal Year (FY) 2021 Performance and Accountability Report (PAR), which is a comprehensive report on the state of the USPTO, is available online. According to a blog in the USPTO Director's Forum by Jay Hoffman, USPTO Chief Financial Officer, the financial health of the USPTO is strong and highlights achievements such as having strong and healthy balances in both the USPTO patent and trademark operating reserves and removing "significant deficiency" associated with information technology (IT) internal security controls.

The performance highlights from page 2 of the FY 2021 USPTO PAR are reproduced below

PERFORMANCE HIGHLIGHTS			
Performance Measures	FY21 Target	FY21 Actual	Performance Results*
Total PTA Compliance - Mailed Actions	84%	83%	Red
Total PTA Compliance - Remaining Inventory	86%	86%	Green
Trademark Average First Action Pendency (months)	4.5	6.3	Red
Trademark Average Total Pendency (months)	12.0	11.2	Green
Trademark First Action Compliance Rate	95.5%	96.3%	Green
Trademark Final Compliance Rate	97.0%	98.7%	Green
Exceptional Office Action	50.0%	54.1%	Green
Percentage of prioritized countries for which intellectual property (IP) country teams have made progress on at least 3 of the 4 performance criteria: a. Institutional improvements of IP office administration for advancing IP rights; b. Institutional improvements of IP enforcement entities; c. Improvements in IP laws and regulations; d. Establishment of government-to-government cooperative mechanisms	66%	100%	Green
Number of people, including Foreign Government Officials and U.S. Stakeholders, trained on best practices to protect and enforce IP	5,000	17,841	Green

Additional FY 2021 USPTO PAR highlights include:

- (1) patent application filings remained strong and finished the year with an upward trajectory while trademark application filings experienced "an unprecedented surge" in FY 2021;
- (2) patent application filings exceeded 650,000 while trademark application filings exceeded 943,000, which was a record high;
- (3) additional strides in patent timeliness were made, and a decade-long trend in improvement in patent application pendency continued;

USPTO NEWS

USPTO Fiscal Year 2021 Performance and Accountability Report (Cont.)

- (4) interim procedures were enacted to conform to the U.S. Supreme Court decision in the *United States v. Arthrex, Inc.* regarding the constitutionality of USPTO administrative patent judges (APJs) by providing parties a way to request USPTO Director review of Patent Trial and Appeal Board (PTAB) final decisions in inter partes review and post-grant reviews;
- (5) additional tools to help business owners clear the federal Trademark Register of unused marks were implemented as part of the Trademark Modernization Act (TMA) of 2020;
- (6) new trademark examining attorneys were hired and trained to address the surge in trademark applications and the resulting examination backlog;
- (7) IT systems were upgraded;
- (8) modernization of patent filings is continuing with a transition to DOCX filings;
- (9) education and outreach programs were implemented to promote innovation;
- (10) efforts toward global IP harmonization continued; and
- (11) the Economic Relief Working Group, the Climate Working Group, and the Equity Working Group were established to assist with facilitating the nation's economic recovery, tackling climate change, and increasing access to the IP ecosystem for all.



USPTO NEWS

USPTO News Brief

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The United States Patent and Trademark Office (USPTO) recently announced:

- (1) Microsoft Teams rather than Webex is now available for virtual interactions, including Examiner interviews;
- (2) a new Patent Public Search webpage and a new Patent Public Search tool are available. The new Patent Public Search tool is based on the Patents End-to-End search tool that USPTO Examiners use and combines the capabilities of four search tools: Public-Examiner's Automatic Search Tool (PubEast), Public-Web-based Examiner's Search Tool (PubWest), Patent Full-Text and Image Database (PatFT), and Patent Application Full-Text and Image Database (AppFT). These four search tools are scheduled to be retired in September 2022. According to the USPTO, the new search tool "provides more convenient, remote, and robust full-text searching of all U.S. patents and published patent applications";
- (3) an on-demand training video and training webinars on how to file in DOCX can be accessed through the Patent Center. A surcharge of \$400 for filing a specification, claims, and abstract in non-DOCX format is scheduled to take effect January 1, 2023;
- (4) a First Office Action Estimator tool is available through Private PAIR or the Patent Center. The First Office Action Estimator tool provides a time estimate to receive a first Office Action on a particular U.S. patent application, and accounts for a new methodology for assigning patent applications to Examiners based on Cooperative Patent Classification (CPC).





USPTO NEWS

**USPTO DEFERRED SUBJECT MATTER ELIGIBILITY RESPONSE (DSMER)
PILOT PROGRAM**

By: Mehdi Sheikerz, Partner

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The USPTO has implemented a new pilot program, starting from February 1, 2022 and ending on July 30, 2022, to evaluate the effect of permitting applicants to defer responding to subject matter eligibility (SME) rejections in certain patent applications.

The Deferred Subject Matter Eligibility Response (DSMER) pilot program is designed to evaluate how deferred applicant responses to SME rejections affect examination efficiency and patent quality as compared to traditional compact prosecution practice by the Examiners. The program was initiated in response to a letter from U.S. Senators Thom Tillis and Tom Cotton.

Participation in this program is by invitation. The USPTO will notify an applicant of the invitation to participate if the application meets certain criteria that generally include:

- the application is an original nonprovisional utility application or national stage of an international application;
- the application does not claim the benefit of the earlier filing date of any prior nonprovisional application;
- the first office action on the merits makes *both SME and non-SME rejections*.

The invitation will be included as a form paragraph in the first office action on the merits, and will inform the applicant how to accept or decline the invitation.

The first Office action on the merits would still include both SME and non-SME rejections. However, participation in this pilot program provides the applicant with a limited waiver of the requirement to submit a complete response to all the rejections under 37 CFR 1.111(b) with respect to the SME rejections.

In other words, the limited waiver of 37 CFR 1.111(b) permits the applicant to defer presenting arguments or amendments in response to the SME rejection(s) until the earlier of final disposition of the participating application (i.e., final office action), or the withdrawal or obviation of all other outstanding rejections. Other than this permitted deferral of responding to SME rejection(s), the applicant's replies must still be fully responsive to office actions as in a normal prosecution process.

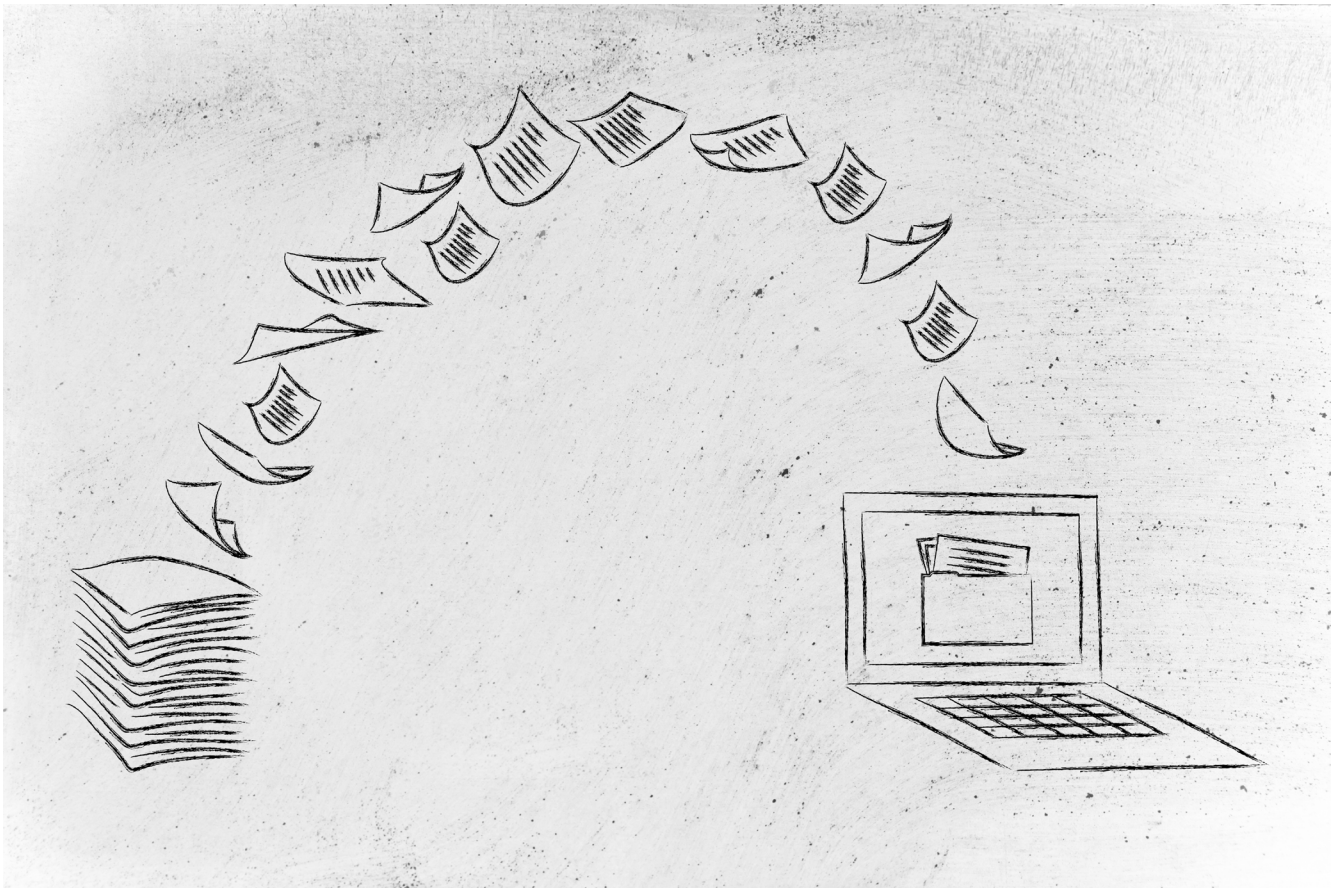
This pilot program may be beneficial from a prosecution efficiency standpoint until a final office action is issued, because the applicant may not need to submit additional particular arguments and/or claim amendments directed to SME rejections. Therefore, the applicant potentially has the opportunity to place the application claims in condition for allowance by overcoming non-SME rejections that may result in overcoming SME rejections. This is because the Examiner will consider whether the applicant's responses to non-SME rejections also overcome the SME rejections.

If you have any question, please contact us.

S&H FIRM NEWS

Staas & Halsey LLP Has Gone Paperless![Back to Top](#)

Since about the year 2010, our firm has maintained duplicative paper and electronic “official” files for each of our client’s matters. Effective January 1, 2020, our firm discontinued maintenance and use of our “official” paper client files, and instead relies only on our electronic official client files. This change in procedure takes advantage of advances in technology to reduce costs and improve efficiency.



S&H FIRM NEWS

Continuing Uninterrupted In View of COVID-19

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Staas & Halsey LLP (S&H) continues to monitor the rapidly changing circumstances surrounding COVID-19, the illness caused by a novel coronavirus. We have taken measures to continue to provide uninterrupted service to our clients during the COVID-19 outbreak in the USA and other countries.

Beginning Monday, March 16th 2020, we implemented the S&H business continuity plan that allows our attorneys and staff to work remotely when necessary. By adopting a document management system ten years ago and going completely paperless in early 2020, the transition to remote working has been relatively smooth.

The S&H remote work system for employees uses an encrypted tunnel to provide connectivity to the S&H servers storing the S&H document and docketing management software, and access to email servers. Staas & Halsey is in compliance with the UK Data Protection Act 2018, as amended in 2019; the European Union's General Data Protection Regulation (GDPR); and the California Consumer Privacy Act (CCPA).

The above mentioned business continuity plan is anticipated to continue until further notice, and may be updated, including any updates taking into consideration recommendations of U.S. local and federal governments and the World Health Organization.

We continue to ask that communication to our firm be electronic, via e-mail, facsimile, portals, or similar means. If physical items need to be sent to Staas & Halsey LLP, please provide S&H prior notification and at least inform Docketing@s-n-h.com of any such anticipated delivery of physical items so that S&H can make arrangement for receipt of such physical items. If we normally send you packages of physical items, like paper copies of communication, please note that at times these may be delayed.

We have postponed all travel plans as a precaution based on the recommendation of the U.S. local and federal governments and the World Health Organization.

We send our best wishes and thoughts to everyone that have been affected by the COVID-19 virus and hope for a healthy tomorrow.

If you have any questions, please contact us at Docketing@s-n-h.com.

S&H FIRM NEWS



STAAS & HALSEY LLP CELEBRATES 50 PLUS YEARS IN 2022

Specializing exclusively in intellectual property, Staas & Halsey LLP brings together technical and legal expertise in our commitment to provide quality legal representation.

Since 1971, we have provided clients with technical expertise and intellectual property protection.

We provide our clients with high quality and high value intellectual property protection through patent application and trademark application preparation and prosecution services before the United States Patent and Trademark Office, understand and care for our clients' concerns by developing long-term and close relationships with our clients, and provide our clients with training to understand the complexities and nuances of U.S. patent prosecution.

We thank all of our clients for being part of our journey!

STAAS



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