

# 2021 SPRING NEWSLETTER



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## SUPREME COURT

### ***Google v. Oracle - Take 2***

By: Richard A. Gollhofer, Partner

As discussed in the blog [post](#) on April 5, 2021, the U.S. Supreme Court's decision in *Google LLC v. Oracle Am., Inc.*<sup>1</sup> saved Google \$9 billion and prevented Oracle's attempts to control use of the Android operating system in hundreds of millions of devices. For everyone who has created or used a computer program that is not in the public domain or open source licensed, the important thing is why the Supreme Court found in favor of Google.

Justice Stephen Breyer's majority opinion of the Supreme Court assumed for argument's sake that the 11,500 lines of declaring code from the API for Java SE (0.4% of the API) copied by Google can be copyrighted, and focused on whether Google's use of those lines was a "fair use." That leaves the extent of copyright protection for computer programs a question that the Supreme Court could decide in the future. The existence of copyright protection for computer programs is well-established<sup>2</sup>, although there is still some disagreement among the U.S. Courts of Appeal regarding the extent of protection.

Although Google had argued otherwise, the court cited overwhelming U.S. case law that fair use is a mixed question of fact and law that is ultimately decided by a judge. The opinion cited Supreme Court precedent "that [found] fair use depends on the context" and noted the legislative history of the Copyright Act of 1976 instructed courts to "'adapt the doctrine [of fair use] to particular situations on a case-by-case basis' and in light of 'rapid technological change'". According to Justice Breyer, the dissenting opinion prioritized certain factors in fair use analysis over others and asserted that "no attempt to distinguish among computer code is tenable", views that the majority of the Supreme Court rejected.

The opinion explains how the four guiding factors set forth in the Copyright Act's § 107 fair use provision: (a) the purpose and character of the use; (b) the nature of the copyrighted work; (c) the amount and substantiality of the portion used in relation to the copyrighted work as a whole; and (d) the effect of the use upon the potential market for or value of the copyrighted work", are to be applied in the case of computer software. In this case, and many others, the question for the first factor is whether the use is "transformative." *Campbell v. Acuff-Rose Music*<sup>3</sup> established that "transformation is a key factor in fair use"<sup>4</sup>, but both *Campbell* and *Google v. Oracle* cited the highly influential article "Toward a Fair Use Standard"<sup>5</sup>.

There were two critical ways that the Supreme Court's viewpoint differed from that of the Federal Circuit which found copyright infringement. First, "the value of the copied lines is in significant part derived from the investment of users (here computer programmers) who have learned the API's system." The Supreme Court took the view that the value belonged to the users, not the provider of the API. The Federal Circuit took the view that the value belonged to the creator of the copyrighted work. Second, the Supreme Court took the view that by using the copied declaring code of the API in a different computing environment, the Android platform for smartphones, Google's use was "transformative" and "therefore consistent with that creative progress that is the basic constitutional objective of copyright". The Federal Circuit's view was the exact opposite, finding no transformation, because "the purpose of the API packages in Android is the same as the purpose of the packages in the Java platform; ... Google made no alteration to the expressive content or message of the copyrighted material; and ... smartphones were not a new context."<sup>6</sup>

## SUPREME COURT

### ***Google v. Oracle - Take 2 (cont.)***

By relying on Section 107 of the Copyright Act to conduct fair use analysis, the Supreme Court left juries and judges to balance the facts in specific cases. In the original 2012 district court case, Judge Alsup held that the copied code cannot be protected as a method under Section 102(b), relying on the reasoning in *Lotus v. Borland*.<sup>7</sup> Most observers would have preferred a simpler rule to apply, thereby making outcomes more predictable so that business decisions would be easier to make. Once again, as in the recent patentable subject matter decisions,<sup>8</sup> the Supreme Court has shown a lack of concern for the effect of their decisions on businesses and a preference for preserving flexibility, if not downright muddy case law.

The Supreme Court's opinion, as well as the Federal Circuit's 2014 and 2018 decisions and Judge Alsup's orders in 2012 and 2016 are available by clicking on the links in this sentence.

<sup>1</sup>41 S. Ct. 1163, 2021 USPQ2d 391 (2021).

<sup>2</sup>R. Gollhofer, "Copyright Protection of Computer Software: What is it and how did we get it?" Software Law Journal, Vol. V, No. 4, 1992.

<sup>3</sup>510 U.S. 569, 579, 114 S.Ct. 1164, 1171, 127 L. Ed. 2d 500, 515, 29 USPQ2d 1961, 1965 (1994) made "transformative use .

<sup>4</sup>Seltzer v. Green Day, Inc., 725 F.3d 1170, 1176, 107 USPQ2d 1803, 1806 (9th Cir. 2013).

<sup>5</sup>103 Harv. L. Rev 1105 , 1110 (1990) by Pierre N. Leval, now a senior judge of the 2nd Circuit, in 1990 a judge in the S Dist of New York; [https://www.law.berkeley.edu/files/Leval\\_-\\_Fair\\_Use.pdf](https://www.law.berkeley.edu/files/Leval_-_Fair_Use.pdf).

<sup>6</sup>Oracle Am. v. Google Llc, 886 F.3d 1179, 1200, 126 USPQ2d 1228, 1241 (Fed. Cir. 2018). 749 F.3d 807, 34 USPQ2d 1014 (1st Cir. 1995).

<sup>8</sup>*Bilski v. Kappos*, 561 U.S. 593, 130 S.Ct. 3218, 177 L.Ed. 2d 792, 95 USPQ2d 1001, (2010); *Mayo Collaborative Services v. Prometheus Laboratories Inc.*, 566 U.S. 66, 132 SCt 1289, 101 USPQ2d 1961 (2012); and *Alice Corp. Pty. Ltd. v. CLS Bank Int'l*, 573 U.S. 208, 134 S.Ct. 2347, 189 L.Ed. 2d 296, 110 USPQ2d 1976 (2014).





## FEDERAL CIRCUIT

**IN RE BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR  
UNIVERSITY**

By: Raph Y. Kim, Associate

In the two opinions issued in March (Appeal No. 2020-1012 (March 11) and 2020-1288 (March 25)), the U.S. Court of Appeals for the Federal Circuit (“Federal Circuit”) held that that biotechnological patent applications owned by Stanford University and involving computational methods for predicting genetic outcomes claim ineligible abstract ideas under 35 U.S.C. § 101 and affirmed two Patent Trial and Appeal Board determinations.

The cases involved two patent applications directed to processor-implemented, statistical methods for determining “haplotype phasing.” Haplotype phasing is a process for determining the parent from whom alleles (i.e., versions of a gene) are inherited.

Stanford University argued that the applications at issue “are in the field of bioinformatics,” “where computer and information processing techniques can be combined with biological and genetic information to detect and diagnose certain conditions.” Stanford University argued that this haplotype phasing techniques in the field of bioinformatics “promise[] to revolutionize personalized health care by tailoring risk modification, medications, and health surveillance to patients’ individual genetic backgrounds,” because the claimed methods “provide more accurate predictions of haplotype phase.

Stanford further argued that the claims were not abstract because they recite a specific method of predicting haplotype phase. Stanford argues that “claim 1 is not directed to an abstract idea because the specific application of the steps is novel and enables scientists to ascertain more haplotype information than was previously possible.”

Stanford also argued that the claimed subject matter of those in *Finjan*, *McRO*, and *Enfish*, which are upheld under § 101. For example, Stanford argued that haplotype phasing is a computer implemented field, and that under *McRO*, “improvements to computer implemented fields are considered technological improvements.”

However, the Federal Circuit affirmed the PTAB’s decision that claimed features are patent in eligible under § 101 based on the Supreme Court’s two-step *Alice* framework for patent eligibility.

Under the first step, the Federal Circuit held that Stanford’s claims recite no more than generic steps of implementing and processing calculations and do not recite a practical application or an improvement to a technological process of such calculations, even if the result of the calculation yield a more accurate haplotype prediction.



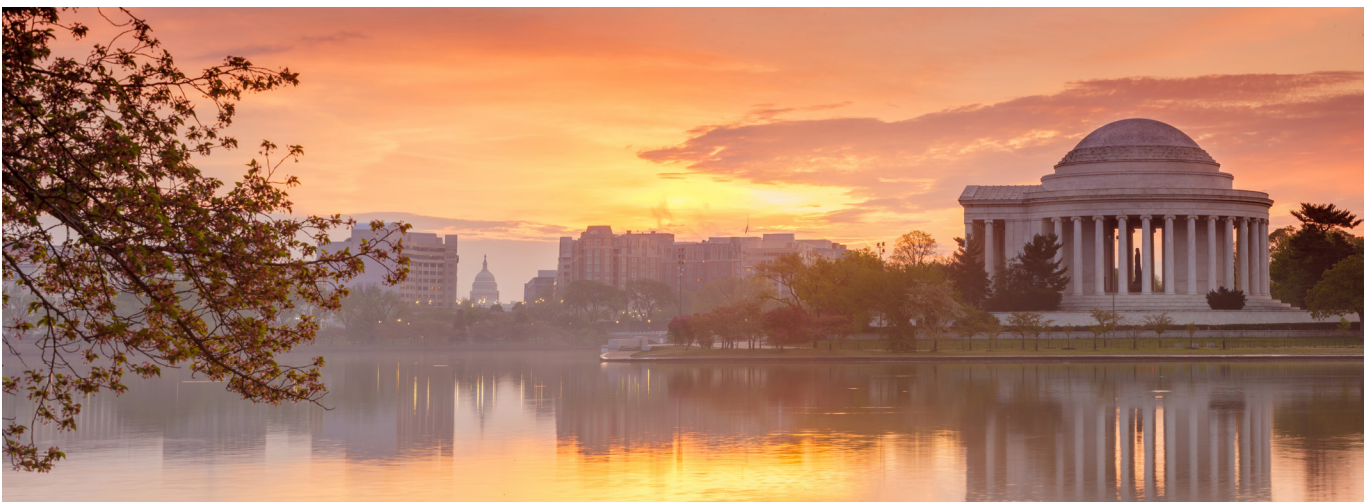
## FEDERAL CIRCUIT

***IN RE BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR  
UNIVERSITY (cont.)***

The Federal Circuit also held that, because the claims do not recite a practical application or technological improvement, Stanford's claims are distinguished from those previously upheld by the court. The Federal Circuit provided that *McRO's* claimed process created a sequence of synchronized, animated characters. *Finjan's* claimed method drawn to a behavior-based virus scan that protects against viruses that have been "cosmetically modified to avoid detection by code-matching virus scans". In *Enfish*, the claims were directed to "an innovative logical model for a computer database" that included a self-referential table allowing for greater flexibility in configuring databases, faster searching, and more effective storage.

The Federal Circuit held that the claims also failed *Alice* step two. The Federal Circuit held that the claims did not include an inventive concept and that the claimed steps are well-known, routine, and conventional. The Federal Circuit provided that claims reciting method steps carried out by a "computer system" with a "processor" and a "memory" are so general that "it is hard to imagine a patent claim that recites hardware limitations in more generic terms than the terms employed by claim 1."

The Federal Circuit also provided that Stanford's arguing the specific combination of claim features making the process novel are oversimplified by the PTAB in determining the patent eligibility under § 101 belongs to "novelty" under § 102, which is not "the touchstone of eligibility." Federal Circuit explained that "a specific or different combination of mathematical steps yields more accurate haplotype predictions than previously achievable under the prior art is not enough to transform the abstract idea [] into a patent eligible application."



FEDERAL CIRCUIT

**QUALCOM INCORPORATED VS. APPLE INC.  
ORAL ARGUMENT, APPEAL NO. 2020-1558**

By: Gene M. Garner II, Partner

On May 4, 2021, oral arguments were heard by the Court of Appeals for the Federal Circuit (“CAFC”) relating to whether the Patent Trial and Appeal Board (“the Board”) of the United States Patent and Trademark Office (“USPTO”) could use statements made in an issued patent which is the subject of an inter partes review (“IPR”) in which a request was made to cancel as unpatentable one or more claims.

**Background**

At issue during the oral arguments was whether it is permissible to use such statements in the issued patent in the IPR in combination with a prior art reference as a “basis of prior art consisting of patents or printed publications” within the meaning of 35 U.S.C. 311 (Inter partes review) to cancel claims in the issued patent:

(b) SCOPE.—A petitioner in an inter partes review may request to cancel as unpatentable 1 or more claims of a patent only on a ground that could be raised under section 102 or 103 and only on the basis of prior art consisting of patents or printed publications.

Also at issue was whether the CAFC should decide to what extent it is permissible to use such statements in the issued patent as a basis for unpatentability during an IPR then remand to the USPTO for reconsideration based on the CAFC’s decision or whether the CAFC should remand to the USPTO for reconsideration based upon now-updated guidance that the USPTO has established internally without issuing a decision.

**Arguments**

Arguments were presented that 35 USC 311(b) limits the Board to considering only prior art patents or printed publications during an IPR and that statements made in the issued patent could only be used in limited supporting roles to assist in understanding the meaning of the prior art patents or publications. That is, it would be impermissible to use such statements to supply limitations not found in prior art patents or publications since such statements themselves were not included in a prior art patent or publication.

Counter arguments were presented that it is permissible to use such statements included in the issued patent to supply limitations acknowledged as known in the art since such statements are admissions which are inherently reliable and knowledge of skilled artisans is relevant and are readily available to the Board. Further arguments were presented that such statements in the issued patent are unlike other types of prior art identified in 35 USC 102(a), such as public use or on sale, which are not included as a basis for an IPR in 35 USC 311(b) since such public use or on sale issues would be difficult for the USPTO to investigate.

**Analysis**

Care should be exercised to avoid making statements in a patent application, including the background section, which could be used to challenge the validity or scope of claims in a subsequently-issued patent.



## DISTRICT COURTS

**PATENT MARKING CAN IMPACT DAMAGES**

By: Mehdi Sheikerz, Partner

In the recent case of DivX LLC v. Hulu LLC, C.D. Cal., No. 21-cv-01615, June 11, 2021, a federal U.S. District Court in the Central District of California agreed with Hulu (Defendant) to dismiss the DivX's (Plaintiff) claims for *pre-suit* damages on a patent. The Court found that DivX didn't allege in DivX's complaint that DivX had complied with marking requirements under patent law.

"Patent Marking" is a common term to describe the labeling of a commercial product, which is manufactured or sold in the United States, with a U.S. patent number that covers the product or its method of manufacture or assembly. Patent marking is addressed by U.S. patent statute 35 U.S.C. §287:

Patentees, and persons making and selling any patented article for or under them, may give notice to the public that the same is patented, either by fixing thereon the word "patent" or the abbreviation "pat." together with the number of the patent, or when, from the character of the article, this cannot be done, by fixing to it, or to the package wherein one or more of them is contained, a label containing a like notice.

To collect damages for infringement, the statute requires patent holders to notify the public that the good or goods being sold are patented.

Patent marking is not mandatory, but is important to obtain damages for infringement by a competitor or other party. 35 U.S.C. §287 states in relevant part:

In the event of failure so to mark, no damages shall be recovered by the patentee in any action for infringement, except on proof that the infringer was notified of the infringement and continued to infringe thereafter, in which event damages may be recovered only for infringement occurring after such notice.

If a product is properly marked with the applicable U.S. patent number and there is infringement, the infringer would be liable for damages from the date the product was first marked. In many cases, this means the possibility of collecting damages from the first date of actual sales of the infringing product by the unauthorized party. Marking may also eliminate the legal burden of proving actual notice of the U.S. patent by the infringer.

The failure to mark a patented product will not invalidate the U.S. patent and will not render the patent unenforceable against an infringer for future infringing sales. However, failure to mark does prevent collection of damages for infringing sales prior to the time the infringer was put on actual notice of the patent. Actual notice of the U.S. patent may not occur until months or even years after actual infringing sales have started by the unauthorized party. Thus, failing to mark patented products may cause a loss of substantial revenue.

In the Hulu v. DivX case, DivX asserted ownership of several patents covering internet video streaming technologies. Hulu argued that while DivX contends that its patented technology has been licensed over 1.5 billion times, its February 2021 complaint was silent about DivX requiring licensees to mark products that incorporate the technology.



## DISTRICT COURTS

**PATENT MARKING CAN IMPACT DAMAGES** *(cont.)*

DivX did not argue compliance with the marking requirements and asserted that the notice requirement of 35 U.S.C. §287 would not apply to method claims being asserted in the complaint.

According to the Court's rationale, DivX has asserted in its complaint the patent claims of three patents, where for one patent, the claims covering a system or apparatus were asserted, thereby triggering the marking requirements for pre-suit damages, and for the other two patents method claims were asserted.

According to the Court's decision, "Each of those claims for relief asserts at least a system or apparatus claim and thus DivX is required to plead compliance with §287(a) to assert pre-suit damages. ... DivX has not done so and does not attempt to claim otherwise."

Therefore, the Court agreed with Hulu (Defendant) to dismiss the DivX's (Plaintiff) claims for pre-suit damages on the one patent for which system or apparatus claims were asserted. Hulu's motion to dismiss was denied regarding the two patents involving method claims, since the notice requirement of §287 would not apply. DivX was given a chance to amend its complaint.

Patent marking is an important matter. A program for establishing and monitoring patent marking should be instituted, because of the significant advantages discussed above and to take into consideration marking legal matters such as avoiding mismarking, false marking, patent misuse, and compliance with foreign country patent marking.





## USPTO NEWS

### Annual Citizen Centric Report

By: Sunil Chacko, Associate

The Citizen Centric Report put out annually by the Advisory Committee highlights the USPTO's performance for the previous year and its goals for the upcoming year. This year's report focused on the USPTO initiatives to respond to the COVID-19 pandemic, the USPTO performance, and its management challenges for the upcoming year.

#### COVID-19

Like all government agencies the USPTO made adjustments due to the COVID-19 pandemic. Relying on the authority granted by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), the USPTO temporarily extended deadlines for filing many patent and trademark documents and fees.

Additionally, to encourage research into potential treatment for COVID-19 the USPTO created the COVID-19 Prioritized Examination Pilot Program which enables small and micro entities to accelerate prosecution, at no charge, for inventions that are subject to approvals by the Food and Drug Administration for use in treating COVID-19. Additionally the USPTO launched the Patents 4 Partnership website, which was designed to connect patentees with potential licensees.

#### Performance/Quality

The USPTO's key performance measures from the report are reproduced below.

KEY PERFORMANCE MEASURES	FY 2017	FY 2018	FY 2019	FY 2020
Percentage of patent actions mailed within statutory timeframes for not issuing patent term adjustment (i.e., with no required adjustment in the period of time the patent is in force) <sup>1</sup>	81%	80%	81%	83%
Percentage of total patent inventory within statutory timeframes for not issuing patent term adjustment (i.e., with no required adjustment to the period of time the patent is in force) <sup>1</sup>	n/a	n/a	88%	88%
Percentage of frequent patent practitioners satisfied with overall quality of patent examination <sup>2</sup>	91%	92%	93%	94%
Average number of months before trademark review is initiated	2.7	3.4	2.6	3.0
Average number of months to obtain a trademark	9.5	9.6	9.3	9.5
Percentage of first office actions consistent with the quality standards established by the Trademarks organization	97.3%	96.9%	96.4%	95.7%
Percentage of final office actions consistent with the quality standards established by the Trademarks organization	98.3%	97.9%	97.4%	98.1%

The number presented above show a slight improvement in patent actions mailed out within statutory time frames and an improvement in patent practitioner's satisfaction with overall quality of patent examination. Trademarks however, shown an increase in the average number of months before a trademark is initiated (i.e., 3 months) and a slight decrease in quality of first office actions for trademarks issue by the USPTO.

## USPTO NEWS

### Annual Citizen Centric Report (*cont.*)

#### Challenges for the Upcoming Year

The USPTO has identified the following items challenges for the upcoming year:

1. Maintaining stable and sustainable funding and continuing to optimize the management of the USPTO's financial resources
2. Enhancing IT capabilities and infrastructure
3. Managing ongoing legal challenges, specifically cases question the USPTO's process for appointing administrative patent and trademark judges.

We will keep an eye out further release and statements by the Advisory Committee and the USPTO to keep you informed on any further developments or statements that may be beneficial to your organization.





## USPTO NEWS

### USPTO Taking Steps to Implement Provisions of the Trademark Modernization Act of 2020

By: Jeremy Stroh, Partner

The United States Patent and Trademark Office (USPTO) has recently proposed several changes to the Trademark rules of practice in an effort to implement the Trademark Modernization Act (TMA), which was enacted on December 27, 2020. Many of the changes are directed to providing new avenues for interested parties to clear away registered marks which are not being used by owners of the marks. Additionally, some of the proposed rule changes are directed to speeding up prosecution of trademark applications in an effort to improve efficiency.

On May 18, 2021, the USPTO published a notice of proposed rulemaking which details the proposed rule changes. Some of the rule changes are scheduled to take effect in December 2021, while others are not set to take effect until June 2022. The USPTO recently held two virtual round table discussions in June to offer more guidance regarding the proposed rule changes. Interested stakeholders have 60 days from the May 18th publication date to submit comments on the proposed changes.

A brief discussion of the significant proposed changes to the Trademark rules of practice is presented below.

#### **New Nonuse Cancellation Mechanisms**

One of the goals of the TMA was to ensure that registered trademarks are actually in use, so that legitimate businesses can clear and register their own marks. In an effort to achieve this goal the TMA created two new ex parte proceedings – one for expungement and one for reexamination. These new proceedings are intended to provide a more efficient method compared to a contested inter partes cancellation proceeding before the Trademark Trial and Appeal Board (TTAB).

An expungement proceeding allows a party to request cancellation of some or all of the goods or services because the registrant never used the trademark in commerce, while the reexamination proceeding allows a party to request cancellation of some or all of the goods or services based on an allegation that the mark was not in use in commerce on or before a particular relevant date.

The proposed rules specify the timelines that a petition can be filed to request institution of an expungement or reexamination proceeding, set a proposed petition fee (e.g., \$600), and outline other requirements for the petition to be accepted, such as the submission of a verified statement that a “reasonable investigation” was conducted by the petitioner to determine that the mark was not used in commerce.

If the proceeding is instituted by the USPTO, the registrant will be notified through an Office Action and will be required to provide evidence of use to avoid cancellation of the registration.

Finally, the TMA also created a new nonuse ground for cancellation of a registration by allowing a petitioner to allege a mark has never been used in commerce as a basis for cancellation before the TTAB. The USPTO proposes amending the rules to indicate the timing for presenting this ground for cancellation, which is any time after the first three years from the registration date.



## USPTO NEWS

### USPTO Taking Steps to Implement Provisions of the Trademark Modernization Act of 2020 (*cont.*)

#### Flexible Office Action Response Periods

Under current practice, applicants have six months to respond to Office Actions issued during examination of a trademark application. The TMA granted the USPTO the authority to be flexible with respect to the timelines for responding to Office Actions.

Accordingly, as a first option the USPTO is proposing to change the response period to 3 months for responding to Office Actions with the ability to request a single three-month extension with payment of a fee (e.g., \$125). The USPTO is also proposing to enact similar response periods for responding to post-registration reviews of registration maintenance and renewal filings. One exception to the proposed changes to the Office Action response periods, are trademarks filed under the Madrid Protocol (Section 66(a) filings), which will continue to have response periods of six months due to the additional processing times required for those applications.

#### Other Miscellaneous Changes

Other changes proposed by the USPTO include: (1) enacting rules expressly allowing for the USPTO to consider letters of protest from third-parties presenting evidence bearing on the registerability of a mark, and (2) changes to how the USPTO recognizes attorney representation of applicants and registrants.

#### Conclusion

At this time the USPTO's proposed changes are still being evaluated and a "final" rule will not become effective until after considering comments from the public. After such consideration, the final rule implementing the proposed changes is expected to go into effect by December 27, 2021 (except as to the flexible Office Action response period, which is proposed to go into effect in June 2022, due to the significant changes involved in changing the response period).

In the meantime, trademark owners and applicants should be sure to monitor the USPTO's implementation of the TMA as many changes are coming to the Trademark rules of practice.



## S&amp;H FIRM NEWS

***Staas & Halsey LLP Has Gone Paperless!***

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***

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](mailto: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](mailto:Docketing@s-n-h.com).

**S&H FIRM NEWS**



***STAAS & HALSEY LLP CELEBRATES 50 YEARS in 2021***

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!



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