

# 117 PATENT PROFESSIONALS

December 23, 2022

Via Email [Kathi.Vidal@uspto.gov](mailto:Kathi.Vidal@uspto.gov); [Derek.Brent@uspto.gov](mailto:Derek.Brent@uspto.gov); [David.Berdan@uspto.gov](mailto:David.Berdan@uspto.gov)

Kathi Vidal and Derek Brent  
Director and Undersecretary, and Deputy  
Director  
United States Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313

David Berdan  
General Counsel  
United States Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313

Re: Director's Blog, [Top three helpful tips for filing patent applications as you move to DOCX format \(Dec. 19, 2022\)](#) and [Extension of Period To Allow Submission of a PDF With a Patent Application Filed in DOCX Format, 87 Fed. Reg. 77812 \(Dec 20, 2022\)](#)

Dear Director Vidal, Deputy Director Brent, and Mr. Berdan:

We write as 117 patent professionals (attorneys, agents, assistants, and paralegals) to reiterate our opposition to the PTO's DOCX rule. The PTO's software is still unacceptably buggy. Your [blog post of December 19](#) and the PTO's [Federal Register notice of December 20](#) compound both the legal problems for the Office, and the practical confusion for practitioners engendered by the DOCX rule. This letter is a heads up that a longer letter is coming, in which we will explain the problems in more detail. We request that you run a further notice extending the *status quo* to June 30—applicants should have the option to file in either DOCX or PDF, entirely at the applicant's choice, with no fee.

Imagine that the Federal Circuit's ECF system had locks that forbid you to use the techniques you use in your day-to-day use of word processors. Imagine that from time to time when you filed a brief at the Federal Circuit, the system unpredictably—rarely, but at a rate well above zero—changed equations, formatting, numbering, and occasionally dropped out an entire sentence, with little or no notice of the change. Imagine that court rules gave no meaningful opportunity to correct errors introduced by ECF. Imagine that these errors were randomly introduced into the single most critical paper of a proceeding.

The reason it can't happen is because the designers of ECF made a sound engineering decision: ECF accepts PDF (PDF was designed to be universally portable), **exactly** as uploaded (ECF gives you a warning that the storage will be exact—ECF won't even correct mis-applied redactions). The court requires that the PDF be in text-searchable form. The court does **not** throw away useful information by flattening that text-searchable PDF to an image-only bitmap. The only alteration imposed by ECF is a timestamp across the tops of the pages (non-destructively—it can be removed). ECF's choice of text-searchable PDF guarantees that the document contents are unaltered, and will be portable to all computers, and that lawyers are not restricted in use of Word processing features, and all the text is available to the court.

Director Vidal, why are you allowing your staff to force \$200 million per year in costs onto the public to save the PTO \$2 million? Why are you protecting your staff from the consequences of poor software engineering choices and multiple violations of administrative law?

**Our first concern is technological.** The [May 25, 2021 Director's Blog](#) promised that "We are adopting the **submitted** DOCX files as the authoritative document, otherwise referred to as the source or evidentiary copy." DOCX is the wrong form, but the May 2021 promise that the PTO will treat the **applicant's uploaded file** as "authoritative" is an absolute, inviolable requirement. Initial patent application filings are special: the law offers no real opportunity to correct errors. We insist that the Office keep its promise: **the file that the applicant uploads must be the authoritative copy**. No alteration. No "validation" if that validation results in a new or altered version.

In [April 2022, you reneged](#): "the USPTO considers the **validated** DOCX file(s) ... to be the authoritative document." [87 Fed. Reg. 25226, 25227 col. 2 \(Apr. 28, 2022\)](#). PatentCenter's validated DOCX file is generated by a "black box" tool that processes the applicant's uploaded file into an on-the-fly "validated" version. The validated DOCX file differs from the "source" DOCX file that the applicant uploaded. This validated DOCX file(s) provides no guarantees: for example, the checksum data for the "validated" files do not match the checksums that appear on the electronic filing acknowledgement. The April 2022 switch from the applicant's uploaded DOCX to PatentCenter's "validated" DOCX is a major violation of reliability-oriented software engineering. And unilaterally reneging on an important promise is a major violation of trust.

History suggests that the PTO can reliably upload a file and store it with no changes. However, because of the low reliability of the PTO's systems, we do not trust them to do anything more. Because the law restricts any meaningful opportunity for error correction, and a mangled patent application will sometimes be a worthless patent application, a 1-in-1000 error rate will be too high for our malpractice insurers—and as we describe below, the PTO's reliability record suggests that errors will be far above that.

In recent days, the importance of the [May 2021 "submitted source" promise](#) has been reinforced by the number of failures of the PTO's systems. Among these: (1) On Friday Dec. 16, the PTO's systems were down for over two hours. (2) Also on December 16, the PTO's fee payment system was broken for several hours. (3) On December 13, 2022, at 10:30AM, the patent public search was not working: "Unable to process your request, try again later." (4) On December 11, 2022, most of the PTO's patent systems were giving "502 Bad Gateway." (5) For months, private PAIR has been flaking in and out: often, we get "There are No Available Documents for the Application" (in fact, today, December 23, the PTO's main "display only" systems for applicants to review their own applications (Private PAIR and PatentCenter) are broken). **Those failures arose in the space of just one week.**

Looking back over a few months gives many more examples: (6) Over the last two months, the "foreign filing license" notices on filing receipts were broken. (7) The

PTO mailed notices of publication for provisional applications for which publication does not occur. (8) In October, the PTO's systems broke so that outgoing correspondence was marked in the file to set deadlines, but no actual notices were sent to users. (9) PatentCenter's workbench search breaks regularly, giving users "Internal Server Error" or "Search limit exceeded" messages. (10) The PTO provides a feature that is supposed to allow trademark attorneys to prepare papers for signature by the client—but it breaks about every two weeks and requires the attorney to reconstruct the paper a second time. No one should have confidence in the reliability of the PTO's computer systems and software.

Several of the failures just described are in display-only software--the PTO can't even keep simple database lookup-and-display running reliably. The PTO's implicit claim, that it can **rewrite** patent applications reliably, is not credible.

Attached as "Test B – mangle claims" is a set of files that shows a bug that exists as of December 22—PatentCenter separates claims into individual paragraphs, and assigns claim numbers to the individual paragraphs. Anyone with a software engineering background will recognize that error as the product of a fundamental design flaw, not a simple coding error.

To be blunt, we do not trust the USPTO to make modifications to the files we carefully prepare for our clients' patent applications. The DOCX filing system limits us to a few minutes' "review" of the "validated" version. The devious and subtle errors that PatentCenter has given us over several years makes the PTO's approach entirely unacceptable. We cannot get inventor review of the PTO's generated-on-the-fly "validated" DOCX. PatentCenter imposes a time-out a short while after review begins—suppose the phone rings? The DOCX filing system in its present incarnation is completely unreasonable.

Another problem we've observed—if the inventor wrote the first draft using a version of Word for a non-Latin-alphabet market (versions of Word for Israel or Japan), when the document is moved to a US-based Word, Wordremovesinter-wordspacing. PDF prevents—or gives correctable control over—this problem. PatentCenter DOCX filing creates the problem.

This history of pervasive, recurring, and mission-critical problems gives us **no confidence in the PTO's ability to produce reliable software**. We do not trust the PTO to alter patent applications. For some lifetime points of a patent application, the PTO's low reliability can be worked around at acceptable cost. But for newly filed patent applications, there is no recovery from PTO software errors. The only acceptable engineering approach is to start with an inherently-stable design that targets zero defects (several signatories of this letter did their pre-law engineering in such environments—it's clear that that mindset is not present at the PTO). The PTO's approach, starting with an inherently-unstable initial design and trying to debug it up to production-level quality, never works. Our comment letters (in fall 2019 and in subsequent comment periods to OMB) have suggested the high-reliability alternatives used by the courts and other filing systems; the PTO has evaded answering these comments or addressing the proposed alternatives, either by misparaphrasing the comments or by answering with *non sequiturs*. While today's error rate may be

acceptable to PTO management, to us, for initial patent applications, such flawed engineering practices, unrecoverable software errors, observed errors, and refusals of PatentCenter to accept well-formed patent applications are unacceptable, particularly coming from an organization with the PTO's demonstrated low IT quality level.

The problem is not one or two bugs. The problem is the fundamental engineering approach, and neglect of basic engineering principles of robust design. As the public has explained repeatedly in comment letters, DOCX can **never** be bubblegummed-and-bailing-wired one bug fix at a time into a reliable system. The only reliable approach is the one used by the federal courts' ECF—the uploaded file is **exactly** the authoritative copy (perhaps with *added* annotation, but no *alteration*), using a format that was designed from the outset to be portable and reproducible. (Those two constraints lead inevitably back to text-based PDF.)

The [May 2021 promise](#) to treat the applicant's uploaded **source** document as "authoritative" is nonnegotiable. It's the only way to safely bypass the catastrophic consequences of the PTO's less-than-quality software engineering.

**Our second concern is legal. Your staff broke the law. Brazenly. Repeatedly.** The Administrative Procedure Act and e-Government Act required disclosure of certain documents at the time of the Notice of Proposed Rulemaking (July 2019) and final Rule notice (August 2020). Instead, the PTO withheld them. The Paperwork Reduction Act and Executive Order 12866 required certain analyses and filings. The PTO skipped them. The PTO was required to answer public comments candidly; instead the PTO mischaracterized, misdirected, and evaded. The PTO was required to act with candor in *ex parte* regulatory filings to OMB and the Small Business Administration; through documents obtained under the Freedom of Information Act (FOIA), we have now discovered that the PTO left out key facts, mischaracterized the public's comments to evade fair disclosure, and made several false statements to OMB and SBA. Some small technical omissions could be explained as venial (but unlawful) oversight, but when silence, misdirection, mischaracterization, and omission are this repeated and consequential, the only available inference is that the illegal acts were intentional.

In our comment letters, we proposed an alternative that solves the PTO's problem: an applicant would file a **fully** reliable PDF, one with perfect structured text, that gives the PTO all the information the PTO wants. That's easy and reliable for applicants to generate, and useable by the PTO with no alteration. The Administrative Procedure Act and Paperwork Reduction Act both required the PTO to give *bona fide* replies to *bona fide* comments and alternatives. To date, the PTO has evaded the comments by mischaracterizing them or simply going silent with no response. That's beyond just rude; **your staff broke the law**.

The Paperwork Reduction Act and Executive Order 12866 require that an agency conduct certain cost-benefit analyses. *E.g.*, "The agency shall also seek to minimize the cost to itself ..., but shall not do so by means of shifting disproportionate costs or burdens onto the public." 5 C.F.R. § 1320.5(d)(1)(iii). In our letters, we've repeatedly

pointed out the costs of forbidding standard Word usages in drafting applications, of error-checking the PTO's error-prone computations, and of seeking correction. Two estimates put the cost of that error-checking at **\$200 million per year**.<sup>1</sup> The PTO estimates its cost savings at \$3.15 per application, a total of about \$2 million per year. \$200 million of costs is "disproportionate" to \$2 million in savings. The Final Rule notice contained not a word of discussion of cost to the public, only benefit to the Office. The PTO's filings to OMB are similar—they evade the key fact, the cost of error checking and correction that will be forced on the public by the DOCX rule. By this silence, the PTO has admitted that our cost estimates are correct. But the PTO has never explained how DOCX is **not** "shifting disproportionate costs to the public." **Your staff broke the law.**

The Paperwork Reduction Act and its implementing regulations require an agency to (a) conduct several cost-benefit analyses and cross-checks to ensure that the agency minimizes paperwork burden on the public, one at the time of a Notice of Proposed Rulemaking (5 U.S.C. § 3507(d)(1)), and a second one before the rule may go into effect (44 U.S.C. § 3507(d)(4)(D)); (b) request notice and comment on several specific topics (§ 3506(c)(2)(A)), (c) make several filings with the Office of Information and Regulatory Affairs in OMB forwarding those comments and the agency's response, and (d) certify that the agency has taken several specific steps to reduce paperwork burden. 44 U.S.C. § 3507; 5 C.F.R. § 1320.9, .10, .11, .12. Before a new rule may go into effect, an agency must request and obtain an approval from OMB. § 3507(a). That approval is called a "control number."

The PTO skipped many steps required by the Paperwork Reduction Act. The list of breaches could go on for several pages—here are a few highlights:

- The PTO made [none of the required filings at the required times](#).
- In the Notice of Proposed Rulemaking, the PTO claimed that the DOCX rule "has been reviewed and previously approved by OMB" ([84 Fed Reg. at 37431](#)). The public pointed out that there were no relevant filings at the relevant times, so no such review or approval could possibly exist ([Seventy-Three Practitioners letter](#) at 26). Even after the error was pointed out, the PTO repeated the falsehood in the final rule notice. [85 Fed. Reg. at 46985 col. 2](#). Our FOIA documents show that this false claim of "previous approval" was made to OMB in *ex parte* phases of OMB's review.
- In the last paper exchanged between the PTO and OMB (which is the only part of the conversation that OMB makes visible to the public, and that only after conclusion of an otherwise-*ex parte* negotiation), the PTO concedes that it does not have the required control number, never requested one, and is not requesting one now ([PTO to OMB, May 25, 2021, at pages 13-14](#)). In other words, the PTO admitted in its May 2021 letter that its earlier claims, to have a "reviewed and approved" control number, were false.

---

<sup>1</sup> [https://downloads.regulations.gov/PTO-P-2020-0050-0004/attachment\\_1.pdf](https://downloads.regulations.gov/PTO-P-2020-0050-0004/attachment_1.pdf) pages 3-5 and 32-39.

- To OMB, [in an ex parte filing where the PTO had incentive to minimize](#), the PTO represented that only about 10% of applicants “will incur the additional non-DOCX filing surcharge” (May 25 letter at 14). But the PTO’s own “survey” ([84 Fed. Reg. 37413 at col. 2](#)) showed that 20% won’t have a choice, and will either have to change the way they prepare applications or pay the fee.
- In the [May 25 letter at page 14](#), the PTO took no issue with the public’s \$200 million estimate offered by the public comments—the PTO begged off that any explanation “would be premature and not meaningful to the cause of estimating public burden.”
- The PTO promised OMB that “Upon actual implementation of 37 CFR 1.16(u)” the PTO would take necessary steps ([PTO to OMB, May 25, 2021, at page 14](#)). [The PTO didn’t.](#)

Because of staff shortcutting and falsehoods, the PTO has no “control number,” and without that, the PTO **has no authority to charge the \$400 fee**. 44 U.S.C. §§ 3507, 3512; 5 C.F.R. § 1320.6. (The PTO’s Paperwork failure here is almost exactly the same failure that forced the PTO to [stand down on the 2008 rule for ex parte appeals](#).)

We could give similar catalogs of document withholding, shortcutting, errors, and false statements to *ex parte* tribunals under the Administrative Procedure Act, the Regulatory Flexibility Act, and Executive Order 12866.

**Third**, your [Director’s blog of December 19](#) and [Federal Register notice of December 20](#) compound the problems. For example, in the Federal Register you state “The USPTO is no longer seeing any errors being reported as a result of filing patent applications in DOCX format when applicants follow the guidance provided by the USPTO.” The PTO’s guidance purports to forbid any but a few fonts, to forbid a number of features that patent practitioners use to reduce errors, and to forbid use of landscape pages for wide tables, chemical formulas, and equations.

“**Any** errors?” First, as of your receipt of this letter and our “Test B – mangle claims” example, it’s no longer true.

Second, any software engineer knows that, for a system of this complexity, a claim of “no errors” is not remotely credible. That statement tells us more about the PTO’s testing, bug tracking, and quality rigor than about software readiness. We conjecture that your staff neglected self-selection bias—when DOCX filing fails, a rational attorney just abandons the effort and files the individual application in PDF, and likely doesn’t waste time trying DOCX again. Multiple signatories of this letter have tried DOCX and have given up. There are two reasons that use of PatentCenter is stuck at 10% usage—PatentCenter is unreliable, and the PTO doesn’t correct the bugs we report.

Third, your Director’s blog is legally faulty: the PTO may not treat guidance, the “DOCX page” and “DOCX FAQs” as requirements for acceptable applications. Guidance is not enforceable. Agencies may use guidance to interpret “genuine ambiguity,” but not to fill gaps or add new requirements—courts have long been wise to

agencies that promulgate broad or vague regulations, and then impose all the real obligations by guidance.<sup>2</sup> To impose binding obligations or limit rights of the public, the PTO must act by *regulation*. 35 U.S.C. § 2(b)(2)(B).

- The Administrative Procedure Act has been in effect for 75 years. 5 U.S.C. § 553. Requirements of this sort have never been within agency authority to issue by guidance.
- For rules relating to information to be collected by an agency, the agency must observe the procedures of the Paperwork Reduction Act. 44 U.S.C. § 3507; 5 C.F.R. § 1320.3(c)(4)(i) (Paperwork Act applies to any “rule of general applicability”), .10 (procedures for guidance), .11 (procedures for proposed rules), .12 (procedures for current rules). If an agency skips these procedures, the rule cannot be treated as binding, and the agency may not impose any penalty. 44 U.S.C. § 3512; 5 C.F.R. § 1320.6.
- On his first day in office, President Biden reminded agencies of a Presidential Bulletin that sets forth principles for agency use of guidance.<sup>3</sup> The PTO has never implemented this bulletin, despite several reminders from the public.
- The Department of Commerce’s regulations for its component agencies remind agencies that they may not treat guidance as binding. 15 C.F.R. § 29.2.

If your staff advised you that the PTO’s “guidance” or “DOCX page” can be enforced in the manner suggested in the [December 19 blog](#) and [December 20 Federal Register notice](#), or advised you that they have the authority to change the rules on the fly simply because they can’t get their software to handle standard Word features that applicants use, your staff were (at best) unaware of the governing law.<sup>4</sup> Regulatory power comes

---

<sup>2</sup> *Appalachian Power Co. v. EPA*, 208 F.3d 1015, 1020 (D.C. Cir. 2000) (agency may not use guidance to flesh out broad statutes or regulations by saving the specifics for guidance); *Hector v. US Dept. of Agriculture*, 82 F.3d 165, 169-70 (7th Cir. 1996) (when regulation for zoo fences requires “such strength as appropriate ... [and] to contain the animals,” guidance requiring fences to be eight feet is not “interpretive.”); *U.S. v. Picciotto*, 875 F.2d 345, 347 (D.C. Cir. 1989) (regulation purported to permit the agency to impose “additional reasonable conditions and ... limitations” by guidance and wording on a permit; Court reminded agencies that they cannot create *ad hoc* substitutes for statutory rulemaking procedure) If the PTO were to invoke the “interpretative” exception of § 553(b)(A), the PTO surrenders force of law and any power to enforce. *Perez v. Mortgage Bankers Ass’n*, 575 U.S. 92, 96 (2015).

<sup>3</sup> Executive Office of the President, *Bulletin on Agency Good Guidance Practices*, [https://www.whitehouse.gov/wp-content/uploads/legacy\\_drupal\\_files/omb/memoranda/2007/m07-07.pdf](https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/memoranda/2007/m07-07.pdf) (Jan. 18, 2007), reinstated by President Biden after suspension by President Trump, E.O. 13992 (Jan. 20, 2021).

<sup>4</sup> Disregard of the law that governs rulemaking pervades Office operations, and imposes **billions** of dollars of costs on the public each year. An introduction to that problem is set out in David Boundy, *Agency Bad Guidance Practices at the Patent and Trademark Office: a Billion Dollar Problem*, 2018 Patently-O Patent L.J. 20 (Dec. 6, 2018), available at <https://ssrn.com/abstract=3258040> We hope you will take the restoration of the rule of law as one of the core goals of your Directorship, and we look forward to helping you achieve it.

from Congress; your staff can't bootstrap it for themselves to compensate for inept engineering.

PTO staff are trying to have things both ways. In the Final Rule notice, the PTO repeatedly justified DOCX as a "standard." [85 Fed. Reg. 46932, 46957-58 \(Aug. 3, 2020\)](#). Standards are binding in a two-sided way—an implementer can't implement only part of a "standard" and still claim to be "standard." In adopting the rule, the PTO claimed to be following a "standard"—by doing so, the PTO disclaimed any right to forbid *any* "standard" features available in DOCX. If the PTO wants to impose such limits, it must act by fairly-negotiated regulation, not by unilateral, after-the-fact guidance, or by the use of software that doesn't support the use of the full breadth of features available in the "DOCX format". Nor can the PTO take the view that "we implement the part of the standard that's convenient for us, and forbid the part that's convenient for you" and then claim to be "standard." Your staff is trying to have things both ways. Not only is that disingenuous, your staff **broke the law**, specifically the Paperwork Reduction Act (44 U.S.C. § 3506(c)(3)(A), (C) and (E); 5 C.F.R. § 1320.5(d)(1)(i) and (iii), § 1320.9), the President's Bulletin, and Commerce regulations.

Accompanying this letter is a file "Test C – standard features" to show "standard" Word features that patent practitioners use in patent applications. Many of these have been pointed out in past comment letters—instead of fixing the software, the PTO just adds them to the list of features forbidden by the software (apparently with no advance notice in any written document). This after-the-fact changing the rules on the fly and brazen defiance of the PTO's legal obligations creates deep distrust.

Your [December 19 Director's blog](#) and [December 20 Federal Register notice](#) fail to consider the cost to the public of detecting and correcting PTO software errors. In the [Director's Blog of April 27, 2022](#), you listed a number of small benefits—but ignored the large costs. By emphasizing benefits to the agency without balancing them against the largest costs to the public, **you broke the law**. *E.g.*, 5 C.F.R. § 1320.5(d)(1)(iii).

## Conclusions and asks

We ask that you run a Federal Register notice explaining that the PTO will maintain the *status quo* for another six months: applicants can file in DOCX or PDF, at the applicant's option, with no penalty. You can do the same thing you recently did with the CLE rule: back down, and blame the software. Alternatively, you can do as the PTO [did in 2008](#): note that the PTO didn't get its Paperwork Reduction control number in time, so the PTO will not enforce. We'll give you a longer letter in a few weeks that explains why you should rescind the rule entirely. Today, we're just asking to maintain the *status quo* until we can fully develop that letter.

We'll be happy to discuss a proposal we've offered before: an application submission protocol that achieves the PTO's goals at little cost and no risk to applicants, that should be very inexpensive for the PTO to implement, and *improve* reliability relative to today. It's fully consistent with the PTO's internal design documents that we obtained. The PTO has never responded to this suggestion to explain any

problems with it, so we assume this suggestion is entirely workable. In recent months, we discovered another mechanism—perhaps “Accessible PDF” is even better and works for everyone.

If the PTO proceeds further, \$ 200 million in costs and recovery of attorney fees under the Equal Access to Justice Act are strong motivators for suit.

**Point of contact.** A point of contact can refer specific issues to specific authors of various sections of this letter. Please route any questions or further inquiries to David Boundy, [DavidBoundyEsq@gmail.com](mailto:DavidBoundyEsq@gmail.com), (646) 472-9737.

Respectfully submitted,

117 Intellectual Property Practitioners

Alicia Armstrong  
Potomac Law Group, PLLC  
Washington, DC

Christine Arthur  
Potomac Law Group, PLLC  
Washington, DC

Richard A. Baker, Jr.  
New England Intellectual Property, LLC  
West Newbury, MA

Randall B. Bateman  
Bateman IP  
Salt Lake City, Utah

Owen Bates  
Law Office of Owen Bates  
San Jose, CA

Robert Blaha,  
Atlanta, GA

Matthew Booth  
Matthew J Booth PC, Austin TX

David E. Boundy  
Potomac Law Group, PLLC  
Newton, MA

Roger L. Browdy  
Browdy and Neimark, PLLC  
Washington, DC

Michael J. Brown  
Michael J Brown Law Office LLC  
Livingston, NJ

Christina E. Brule  
Heslin Rothenberg Farley & Mesiti PC  
Albany, NY

Karen S. Canady  
canady + lortz LLP  
Los Angeles, CA

Marcellus A. Chase  
Randall Danskin P.S.  
Spokane, WA

Brian Cronquist  
MonolithIC 3D Inc.  
Klamath Falls, OR

Kirk Damman  
Saint Louis, MO

Vincent M DeLuca  
Potomac Law Group, PLLC  
Washington, DC

Michael P. Eddy  
Law Office of Michael P. Eddy  
San Diego, CA

Gerry J. Elman  
Elman IP  
Denton, Texas

William Eshelman  
Law Office of William Eshelman  
Front Royal, VA

Daniel Feigelson,  
Rehovot, Israel

Grace J. Fishel  
Law Offices Grace J. Fishel  
St. Louis, MO

John K Fitzgerald  
Fitzgerald IP Law  
Box Elder, SD

Bradley Forrest  
Schwegman Lundberg Woessner  
Minneapolis MN

Kellie S. Fredericks  
HRFM  
Albany, NY

Derek P Freyberg  
Menlo Park, CA

Alana M. Fuierer  
Heslin Rothenberg Farley & Mesiti PC  
Rochester, NY

Deborah S. Gagliano  
Potomac Law Group, PLLC  
Washington, DC

Sander Gelsing  
Warren Sinclair LLP  
Red Deer, Canada

Antoinette G Giugliano  
Antoinette G Giugliano PC  
Beverly, MA

Judith Lifshutz Goldberg  
Leydig, Voit & Mayer, Ltd.  
Chicago, IL

John Gorecki,  
Boston, MA

John M. Hammond  
Patent Innovations LLC  
Lakeville NY

Philip E. Hansen  
HRFM LLC  
Albany, NY

Charles Andrew Hayes  
Wegman Hessler  
Cleveland, OH

Erica M. Hines  
HRFM  
Albany, NY

Greg Hollrigel,  
San Clemente, CA

Kitty Hussain  
Fountainhead Law Group  
Santa Clara, CA

Maria T. Ianiro  
Potomac Law Group, PLLC  
Cleveland, OH

Demian K. Jackson  
Jackson IPG PLLC  
Shipman, VA

Krista S. Jacobsen  
Jacobsen IP Law  
Campbell, CA

George J. Jakobsche  
George Jakobsche Patent Counsel  
PLLC  
Concord, MA

Ronni S. Jillions  
Browdy and Neimark, PLLC  
Washington, DC

Ronald R Kilponen  
Law office of Ronald R Kilponen  
NOVI, MI

Karen L Kimble  
Technology Law PLLC  
Fort Myers, FL

Howard J Klein  
KOS IP Law, LLC  
Irvine, CA

David Klein  
Dekel Patent Ltd.

Wendy W. Kob,  
Springtown, PA

Katherine Koenig  
Koenig IP Works, PLLC  
Fort Lauderdale, FL

James E Lake  
Randall Danskin  
Spokane, WA

Mary LaMorte  
LaMorte & Associates, P.C.  
Philadelphia, PA

Randy Landrenau  
US Inventor, Inc.  
Clearwater, FL

Mai D. Lauer  
Westman, Champlin & Koehler  
Minneapolis, Mn

Marylou Lavoie  
Marylou J. Lavoie, Esq. LLC  
Simsbury, CT

Gary B. Levin,  
Karnei Shomron, Israel

Wade Lin  
Berkeley Lights, Inc.  
Emeryville, CA

Melvin Li  
Heslin Rothenberg Farley & Mesiti PC  
Milpitas, CA

Orlando Lopez  
Culhane Meadows PLLC  
Branford, CT

Mary Frances Ludwig  
Kintner IP, LLC  
Kintnersville, PA

Deepak Malhotra  
Malhotra Law Firm, PLLC  
Spokane, WA

Josh Malone ,  
Alexandria, VA

Guy Vincent Manning  
Law Offices of Guy V. Manning  
Fort Worth, TX

Steven K Martin  
Altman & Martin  
Boston, MA

Craig McLaughlin  
Law Office of Craig McLaughlin  
Seal Beach, CA

Damon A. Neagle  
Design IP, PC  
Allentown, PA

Richard Neifeld  
Neifeld IP Law PLLC  
Fairfax VA,

Megan Neumann  
Westman, Champlin & Koehler  
Minneapolis, MN

Sam L. Nguyen  
HDC IP Law, LLP  
Dana Point, CA

Stephen M. Nipper  
Colby Nipper PLLC  
Eagle, ID

Sean O'Connell  
Sean O'Connell, PLLC  
Edmond, OK

Carl Oppedahl  
Oppedahl Patent Law Firm LLC  
Westminster, CO

Neil R. Ormos  
Arlington Heights, IL

Karen Dana Oster  
Law Office of Karen Dana Oster, LLC  
Lake Oswego, OR

Miriam Paton  
Integral Intellectual Property Inc.  
Toronto, Canada

Gerald T. Peters  
JTT Patent Services, LLC  
West Lebanon NH

John Pietrangelo  
Tech Valley Patent, LLC  
Glens Falls, NY

Daniel J. Polglaze  
Westman, Champlin & Koehler  
Minneapolis, MN

Margaret Polson  
Polson IP Law, PC  
Westminster, CO

David M. Quinlan  
David M. Quinlan, P.C.  
Princeton, NJ

C. Dale Quisenberry  
Quisenberry Law PLLC  
Houston, Texas

Jocelyn D. Ram,  
Santa Clara, CA

David Rardin  
MCR-IP  
Nashua, NH

Oren Reches  
Reches Patents  
Tel Aviv, IL

Trent L Rector  
HRFM  
Albany, NY

Christine Ricks  
Wilson Sonsini Goodrich & Rosati  
Palo Alto, CA

Robert J. Ross  
Olson & Cepuritis, Ltd.  
Chicago, IL

Ivan E. Rozek  
Savantek Patent Services  
Sonoma, CA

Jeremy Rutman  
Rutman IP  
Boston, MA

Holly Saner  
Fountainhead Law Group  
Santa Clara, CA

Z. Petr Sawicki  
Westman, Champlin & Koehler  
Minneapolis, Mn

Richard A. Schafer  
Schafer IP Law  
Houston, TX

Jeffrey E. Semprebon  
Semprebon Patent Services  
Claremont, NH

Christine Shayda  
Alvaria, Inc.  
Westford, MA

Teige Sheehan  
Heslin Rothenberg Farley & Mesiti PC  
Albany, NY

Brian Siritzky  
Siritzky Law, PLLC  
McLean, VA

William Slate  
Bachman & LaPointe, PC  
New Haven, CT

Marlin R. Smith,  
Royse City, TX

Timothy M. Smith,  
Sugar Land, TX

Donald E. Stout  
Stout, Uxa & Buyan, LLP  
Laguna Hills, CA

Richard Straussman  
Weitzman Law Offices, LLC  
Roseland, NJ

Alexander Streib  
Potomac Law Group, PLLC  
Washington, DC

Suzannah K. Sundby  
Canady + Lortz LLP  
Washington, DC

Daniel Swirsky  
AlphaPatent Associates Ltd  
Beit Shemesh, Israel

Alan Taboada  
Moser Taboada  
Shrewsbury, NJ

Renee N. Tisdale  
Potomac Law Group, PLLC  
Washington, DC

Catherine Van Houten,  
Waldorf, MD

Louis Ventre, Jr.  
Law Firm of Louis Ventre, Jr.  
Oakton, VA

Shannon Vieau  
Fox Rothschild LLP  
West Palm Beach, FL

Shawn T. Walsh  
Microelectronic Devices IP LLC  
El Cerrito, CA

Mitchell J. Weinstein  
Levenfeld Pearlstein  
Chicago, IL

Edward K Welch II  
IP&L Solutions  
Naples, FL

Jeffrey L Wendt  
The Wendt Firm, P.C.  
Austin, TX

Carolyn Winter  
Fountainhead Law Group  
Santa Clara, CA

Terrence M. Wyles  
Startup IP Law, LLC  
Durango, CO

George Yee  
Fountainhead Law Group  
Santa Clara, CA

Bruce A. Young  
Young's Patent Services, LLC  
Grimes, IA

Allen Yun  
Browdy and Neimark, PLLC  
Washington, DC

Narek Zohrabyan  
Phil IP Law Inc.  
Pasadena, CA