I oppose the U.S. Patent and Trademark Offices proposed regulations changing the nature of 
PTAB trials., Docket No. PTO-C-2020-0055.

First, if the regulations are adopted, people and companies wont be able to challenge patents 
through the IPR process when they need to. The PTAB will be able to deny IPRs simply 
because of the timing of district court cases. This will allow patent holders to game the system 
and file strategic litigation to avoid IPRs. The PTAB should not give any consideration to the 
status of court proceedings when deciding whether to initiate an IPR.

Second, the regulations limit the number of petitions that can be filed against the same patent. 
That makes no sense. There will often be multiple challenge to the same patent, especially if its 
being asserted aggressively. Different challenges raise different evidence and sometimes 
address different claims. Congress intent in the America Invents Act was to reduce the amount 
of unnecessary patent litigation by allowing the PTAB to weed out invalid patents before a trial 
takes place. There should be no arbitrary limits on the number of petitions per patent.
The rights of technology developers and users are no less important than the rights of patent owners. When patents are evaluated in federal court, nearly half of them are found to be invalid.

Overall, PTAB trials must be fair, affordable, and accessible. When petitions are likely to succeed on the merits, they should be granted. What happens in the courts, or to other petitions, shouldn't matter.

These proposed regulations will destroy the U.S. system for post-grant patent challenges. Wrongly granted patents are a major burden on the economy and drain on innovation. Every week, they're used to threaten small businesses with extortionate licensing demands especially people who make and use technology. To promote innovation, the Patent Office needs to improve the quality of granted patents, and to do that, we need the robust IPR system Congress designed.