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With regard to docket number PTO-P-2018-0036, I support the USPTO proposal to replace the broadest reasonable interpretation (“BRI”) standard for construing unexpired patent claims and proposed claims in these trial proceedings with a standard that is the same as the standard applied in federal district courts and International Trade Commission (“ITC”) proceedings, as well as the proposal to amend the rules to add that the Office will consider any prior claim construction determination concerning a term of the involved claim in a civil action, or an ITC proceeding, that is timely made of record in an IPR, PGR, or CBM proceeding. I am a practicing patent attorney with experience in both the private sector and as an assistant general counsel in the federal government.

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