Overview of USPTO PTAB proceedings

Patent Trial and Appeal Board
State of the Board

Acting Deputy Chief Judge Scott R. Boalick
Lead Judge Susan L.C. Mitchell
USPTO Locations

*Alexandria, Va. count includes judges who participate in TEAPP.
Board Size Over Time

![Bar chart showing the increase in board size over time from 1900 to 2015. The size ranges from 5 in 1900 to 246 in 2015.](chart.png)
PTAB Office Location Demographics
as of November 16, 2015

- Virginia: 65%
- Michigan: 9%
- Colorado: 6%
- California: 4%
- Texas: 5%
- TEAPP: 11%
Allocation of Duties Among Judges
as of November 16, 2015

- AIA: 30%
- Ex parte Appeals: 53%
- Inter Partes Reexamination Appeals: 7%
- Management: 8%
- Interferences: 1%
Appeals Statistics
## PTAB Receipts and Dispositions

*Period: 09/27/2015 thru 10/27/2015*

<table>
<thead>
<tr>
<th>Discipline</th>
<th># Cases Received</th>
<th># Cases Disposed</th>
<th>Difference (Disposed minus Received)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Biotech</td>
<td>68</td>
<td>64</td>
<td>-4</td>
</tr>
<tr>
<td>Business Methods</td>
<td>73</td>
<td>70</td>
<td>-3</td>
</tr>
<tr>
<td>Chemical</td>
<td>121</td>
<td>110</td>
<td>-11</td>
</tr>
<tr>
<td>Contested Cases</td>
<td>7</td>
<td>35</td>
<td>28</td>
</tr>
<tr>
<td>Design</td>
<td>2</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>Electrical</td>
<td>255</td>
<td>505</td>
<td>250</td>
</tr>
<tr>
<td>Mechanical</td>
<td>213</td>
<td>197</td>
<td>-16</td>
</tr>
<tr>
<td><em><strong>Totals</strong></em></td>
<td>739</td>
<td>983</td>
<td>244</td>
</tr>
</tbody>
</table>
PTAB Inventory – Pending Ex Parte Appeals (excluding appeals from reexamination proceedings)
PTAB Inventory – Pending Ex Parte Appeals
(excluding appeals from reexamination proceedings)
Decisions by Type: FY2014

- Affirmed: 54%
- Affirmed-in-Part: 13%
- Reversed: 30%
- Panel Remand: 0%
- Administrative Remand: 1%
- Dismissed: 2%

Legend:
- Blue: Affirmed
- Red: Affirmed-in-Part
- Green: Reversed
- Purple: Panel Remand
- Yellow: Administrative Remand
- Orange: Dismissed
Expedited Patent Appeal Pilot (EPAP)

- **Ex parte** appeal accorded special status when another is withdrawn
- Pilot effective June 19, 2015 for up to a year
- Timing Goal - 2 months to decide petition & 4 months from the date of petition grant to decide appeal
- Data through November 16, 2015: 22 petitions filed (20 granted and 2 denied); Average time to decide petition approximately 2 days
Small Entity Pilot Program

- Published 09/16/2015
- Provides opportunity for small entities to secure expedited review
- Small entities with a single pending appeal
- Agree to review based on one claim
- No rejections under §112
- Timing Goal - 2 months to decide petition & 4 months from the date of petition grant to decide appeal
- Data through November 16, 2015: 12 petitions filed (8 granted and 4 denied); Average time to decide petition approximately 2 days
## Pendency of Decided Appeals

(from 10/1/2014 through 7/31/2015)

<table>
<thead>
<tr>
<th>Discipline</th>
<th>Technology Center</th>
<th>Number of Decisions</th>
<th>Pendency from PTAB Docketing to Decision (Months)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Biotech</td>
<td>1600</td>
<td>395</td>
<td>32.4</td>
</tr>
<tr>
<td>Chemical</td>
<td>1700</td>
<td>1152</td>
<td>24.9</td>
</tr>
<tr>
<td>Electrical</td>
<td>2100</td>
<td>1490</td>
<td>31.7</td>
</tr>
<tr>
<td></td>
<td>2400</td>
<td>1698</td>
<td>31.4</td>
</tr>
<tr>
<td></td>
<td>2600</td>
<td>1305</td>
<td>31.3</td>
</tr>
<tr>
<td></td>
<td>2800</td>
<td>626</td>
<td>27.0</td>
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<tr>
<td>Designs</td>
<td>2900</td>
<td>20</td>
<td>26.2</td>
</tr>
<tr>
<td>Mech/Bus Methods</td>
<td>3600</td>
<td>1671</td>
<td>31.6</td>
</tr>
<tr>
<td></td>
<td>3700</td>
<td>1389</td>
<td>30.1</td>
</tr>
<tr>
<td>Reexams</td>
<td>3900</td>
<td>218</td>
<td>6.0</td>
</tr>
<tr>
<td><strong>Total Average</strong></td>
<td><strong>9,964</strong></td>
<td></td>
<td><strong>29.7</strong></td>
</tr>
</tbody>
</table>
AIA Statistics
## Comparison by Technology Center of FY 2014 AIA Filings v. Patent Grants

<table>
<thead>
<tr>
<th>TC</th>
<th>AIA Filings</th>
<th>Patent Grants</th>
</tr>
</thead>
<tbody>
<tr>
<td>1600</td>
<td>90</td>
<td>24,669</td>
</tr>
<tr>
<td>1700</td>
<td>107</td>
<td>31,863</td>
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<tr>
<td>2100</td>
<td>188</td>
<td>24,422</td>
</tr>
<tr>
<td>2400</td>
<td>114</td>
<td>30,983</td>
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<tr>
<td>2600</td>
<td>223</td>
<td>40,445</td>
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<tr>
<td>2800</td>
<td>289</td>
<td>70,281</td>
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<tr>
<td>2900</td>
<td>3</td>
<td>22,452</td>
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<tr>
<td>3600</td>
<td>226</td>
<td>38,160</td>
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<tr>
<td>3700</td>
<td>156</td>
<td>42,931</td>
</tr>
<tr>
<td>Other</td>
<td>98</td>
<td>176</td>
</tr>
<tr>
<td>Total</td>
<td>1,494</td>
<td>326,382</td>
</tr>
</tbody>
</table>
Narrative:
This pie chart shows the total number of cumulative AIA petitions filed to date broken out by trial type (i.e., IPR, CBM, and PGR).

*Data current as of: 10/31/2015*
Narrative: These line graphs display the number of IPR, CBM, and PGR petitions filed each month and the total number of all petitions filed each month from the effective date of the AIA trial provisions.

*Data current as of: 10/31/2015
Narrative:
This bar graph depicts the number of AIA petitions filed each fiscal year, with each bar showing the filings for that fiscal year by trial type (i.e., IPR, CBM, and PGR).

*Data current as of: 10/31/2015*
117 Total AIA Petitions in FY 16* (Technology Breakdown)

**Narrative:**
This pie chart shows the total number of AIA petitions filed in the current fiscal year to date as well as the number and percentage of these petitions broken down by technology.

*Data current as of: 10/31/2015*
Narrative:
These three sets of bar graphs show the number of patent owner preliminary responses filed and waived/not filed each fiscal year in IPR, CBM, and PGR proceedings.

*Data current as of: 10/31/2015*
Narrative:
These three sets of bar graphs show the number of decisions on institution by fiscal year broken out by trials instituted (including joinders) and trials denied in IPR, CBM, and PGR proceedings. A trial that is instituted in part is counted as an institution in these bar graphs.

*Data current as of: 10/31/2015
Narrative:
These three sets of bar graphs show settlements in AIA trials broken down by settlements that occurred prior to institution and settlements that occurred after institution in IPR, CBM, and PGR proceedings.

*Data current as of: 10/31/2015*
This graph shows a stepping stone visual depicting the outcomes for all IPR petitions filed to-date that have reached a final disposition.

*Data current as of: 10/31/2015*
This graph shows a stepping stone visual depicting the outcomes for all CBM petitions filed to-date that have reached a final disposition.

**Narrative:**

*Data current as of: 10/31/2015*
Narrative:
This visual contains four cylinders. The first cylinder shows the total number of claims available to be challenged in the IPR petitions filed. The second cylinder shows the number of claims actually challenged and not challenged. The third cylinder shows the number of claims on which trial was instituted and not instituted. The fourth cylinder shows the total number claims found unpatentable in a final written decision, the number of claims canceled or disclaimed by patent owner, the number of claims remaining patentable (not subject to a final written decision), and the number of claims found patentable by the PTAB.

Note: “Completed” petitions include terminations (before or after a decision on institution) due to settlement, request for adverse judgment, or dismissal; final written decisions; and decisions denying institution.

*Data current as of: 10/31/2015
**Narrative:**
This visual contains four cylinders. The first cylinder shows the total number of claims available to be challenged in the CBM petitions filed. The second cylinder shows the number of claims actually challenged and not challenged. The third cylinder shows the number of claims on which trial was instituted and not instituted. The fourth cylinder shows the total number claims found unpatentable in a final written decision, the number of claims canceled or disclaimed by patent owner, the number of claims remaining patentable (not subject to a final written decision), and the number of claims found patentable by the PTAB.

**Note:** “Completed” petitions include terminations (before or after a decision on institution) due to settlement, request for adverse judgment, or dismissal; final written decisions; and decisions denying institution.

*Data current as of: 10/31/2015*
Recent Developments
Recent Developments

- Motions-to-Amend
- AIA Rulemaking
- Request for Comments on proposed Single Judge Pilot Program
Motions-to-Amend

  - Clarified earlier *Idle Free* decision
  - Patent Owner must show patentable distinction over prior art of record (in the proceeding; in the prosecution history; in any other proceeding involving the same patent)
  - Duty of candor and good faith in the Office may lead to additional prior art made of record by the Patent Owner when moving to amend
In response to stakeholder requests, the Office moved forward with two rule packages:

1. A first final rule package that encompassed less difficult “quick-fixes” based upon both stakeholder comments and internal PTAB suggestions, including more pages for briefing for motions to amend and for petitioner’s reply brief; and


The second proposed rule package addresses the remaining issues raised in comments received from the public, as well as providing more guidance concerning our growing experience with AIA proceedings.

The period for public comment closed on November 18, 2015. The Office will issue a final rule, responding to these comments, and also issue a revised Office Patent Trial Practice Guide reflecting guidance concerning our current practice in handling AIA proceedings.
In the second proposed rule package, the Office:

• Proposes to allow patent owners to include, with their opposition to a petition to institute a proceeding, new testimonial evidence such as expert declaration, responding to commentary raising concerns that patent owners are disadvantaged by current rules letting petitioners’ evidence go unanswered before a trial is instituted.

• Proposes a new requirement on practitioners before the PTAB, akin to the Rule 11 requirements in federal courts, that would give the USPTO a more robust means with which to police misconduct.

• Proposes to clarify that the PTAB will use the claim construction standard used by district courts for patents that will expire during proceedings and therefore cannot be amended, while confirming the use of broadest reasonable interpretation (BRI) for all other cases.

• Notes the PTAB’s development of motions-to-amend practice through its own body of decisions, including a recent decision that clarified what prior art a patent owner must address to meet its burden of proof.

• Proposes using a word count for major briefing so that parties are free to present arguments and evidence to the Office in a way that a party deems is most effective, including presenting arguments in claim charts.
Proposed Pilot Program Exploring an Alternative Approach to Institution Decisions
published August 25, 2015

• Goal is to explore efficiency of modifying the approach to institution

• Petition would be assigned to a single judge

• If instituted, two additional judges would be added

• The USPTO initially indicated that written comments must be received on or before October 26, 2015. In view of stakeholder requests for additional time to submit comments on the proposed pilot program, the USPTO extended the period for public comment to November 18, 2015
Thank You
Questions?
Reference Materials
## Major Differences between IPR, PGR, and CBM

<table>
<thead>
<tr>
<th>Inter Partes Review (IPR)</th>
<th>Petitioner</th>
<th>Estoppel</th>
<th>Standard</th>
<th>Basis</th>
</tr>
</thead>
</table>
| Post Grant Review (PGR)  | • Person who is not the patent owner and has not previously filed a civil action challenging the validity of a claim of the patent  
• Must identify all real parties in interest | • Raised or reasonably could have raised  
• Applied to subsequent USPTO/district court/ITC action | More likely than not OR Novel or unsettled legal question important to other patents/applications | 101, 102, 103, 112, double patenting but not best mode |

<table>
<thead>
<tr>
<th>Inter Partes Review (IPR)</th>
<th>Petitioner</th>
<th>Estoppel</th>
<th>Standard</th>
<th>Basis</th>
</tr>
</thead>
</table>
| Inter Partes Review (IPR) | • Person who is not the patent owner, has not previously filed a civil action challenging the validity of a claim of the patent, and has not been served with a complaint alleging infringement of the patent more than 1 year prior (exception for joinder)  
• Must identify all real parties in interest | • Raised or reasonably could have raised  
• Applied to subsequent USPTO/district court/ITC action | Reasonable likelihood | 102 and 103 based on patents and printed publications |

<table>
<thead>
<tr>
<th>Covered Business Method (CBM)</th>
<th>Petitioner</th>
<th>Estoppel</th>
<th>Standard</th>
<th>Basis</th>
</tr>
</thead>
</table>
| Covered Business Method (CBM) | • Must be sued or charged with infringement  
• Financial product or service  
• Excludes technological inventions  
• Must identify all real parties in interest | • Office—raised or reasonably could have raised  
• Court-raised | Same as PGR | Same as PGR (some 102 differences) |
## Major Differences between IPR, PGR, and CBM

<table>
<thead>
<tr>
<th>Proceeding</th>
<th>Available</th>
<th>Applicable</th>
<th>Timing</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Post Grant Review (PGR)</strong></td>
<td>From patent grant to 9 months after patent grant or reissue</td>
<td>Patent issued under first-inventor-to-file</td>
<td>Must be completed within 12 months from institution, with 6 months good cause exception possible</td>
</tr>
<tr>
<td><strong>Inter Partes Review (IPR)</strong></td>
<td>For first-inventor-to-file, from the later of: (i) 9 months after patent grant or reissue; or (ii) the date of termination of any post grant review of the patent. For first-to-invent, available after grant or reissue (technical amendment)</td>
<td>Patent issued under first-to-invent or first-inventor-to-file</td>
<td>Must be completed within 12 months from institution, with 6 months good cause exception possible</td>
</tr>
<tr>
<td><strong>Covered Business Method (CBM)</strong></td>
<td>Available 9/16/12 (for first-inventor-to-file only after PGR not available or completed)</td>
<td>Patents issued under first-to-invent and first-inventor-to-file</td>
<td>Must be completed within 12 months from institution, with 6 months good cause exception possible</td>
</tr>
</tbody>
</table>
Post Grant Resources

• Information concerning the Board and specific trial procedures may be found at:

http://www.uspto.gov/ip/boards/bpai/index.jsp

• General information concerning implementation of the Leahy-Smith America Invents Act, including post grant reviews, may be found at:

http://www.uspto.gov/aia_implementation/index.jsp
Lessons Learned: Petitions

• Conclusions need to be supported by:
  – Sound legal analysis; and
  – Citations to evidentiary record

• Analysis needs to appear in petition itself (no incorporation by reference from declaration)

• Better to provide detailed analysis for limited number of challenges than identify large number of challenges for which little analysis is provided

• See Wowza Media v. Adobe, IPR2013-00054 (Paper 12)(denying petition)
Lessons Learned: Claim Charts

• Use standard two-column format. See FAQ D13

• Claim charts are not sufficient by themselves; they must be explained.

• Claim charts should contain pinpoint references to the supporting evidence. See FAQ D12
Lessons Learned: Claim Construction

• Claim constructions should be supported by citations to the record that justify the proffered construction and analysis provided as to why the claim construction is the broadest reasonable construction. 37 C.F.R. § 42.104(b)(3).

• An example of a failure to provide a sufficient claim construction occurs where claim terms are open to interpretation, but party merely restates claim construction standard to be used, e.g.,

  – A claim subject to inter partes review receives the “broadest reasonable construction in light of the specification of the patent in which it appears.” 37 C.F.R. § 42.100(b)
Lessons Learned: Experts

• Tutorials are helpful especially for complex technologies

• Expert testimony without underlying facts or data is entitled to little or no weight. 37 C.F.R. § 42.65(a). See Monsanto Co. v. Pioneer Hi-Breed Int’l, IPR2013-00022, Paper 43 (denying petition)

• Avoid merely “expertizing” your claim charts
Lessons Learned: Obviousness

- Question of obviousness is resolved based on underlying factual determinations identified in *Graham*
  - Includes addressing differences between claimed subject matter and the prior art

- Address the specific teachings of the art relied upon rather than rely upon what others have said (e.g., examiners)
  - Parties are to address whether there is a reason to combine art (*KSR*) and avoid conclusory statements

- See *Veeam Software v. Symantec*, IPR2013-00145 (Paper 12); *Heart Failure Tech. v. CardioKinetix*, IPR2013-00183 (Paper 12) (denying petition)
Patent Owner Preliminary Response

- Petition Filed
- PO Preliminary Response
- Decision on Petition
- PO Response & Motion to Amend Claims
- Petitioner Reply to PO Response & Opposition to Amendment
- PO Reply to Opposition to Amendment
- Oral Hearing
- Final Written Decision

Timing:
- 3 months
- No more than 3 months
- 3 months
- 3 months
- 1 month
- Hearing Set on Request
- Period for Observations & Motions to Exclude Evidence
- No more than 12 months
Lessons Learned: Patent Owner Preliminary Response

• Clearly identify procedural and substantive reasons to deny petition, e.g.,
  – Statutory bar under 35 U.S.C. § 315 or § 325?
  – Failure to identify real parties-in-interest/privies?
  – Weaknesses in Petitioner’s case?
    • Petitioner’s claim construction is improper
    • Cited references are not, in fact, prior art
    • Cited references lack material element(s)

• Cannot present new testimonial evidence
  – BUT can cite existing testimony and reports
Decision on Petition

1. Petition Filed
2. PO Preliminary Response
3. Decision on Petition
4. PO Response & Motion to Amend Claims
5. Petitioner Reply to PO Response & Opposition to Amendment
6. PO Reply to Opposition to Amendment
7. Oral Hearing
8. Final Written Decision

- 3 months
- No more than 3 months
- 3 months
- 3 months
- 1 month
- Hearing Set on Request
- PO Discovery Period
- Petitioner Discovery Period
- PO Discovery Period
- Period for Observations & Motions to Exclude Evidence

No more than 12 months
Joinder

- **Petition Filed**
- **PO Preliminary Response**
- **Decision on Petition**
- **PO Response & Motion to Amend Claims**
- **Petitioner Reply to PO Response & Opposition to Amendment**
- **PO Reply to Opposition to Amendment**
- **Oral Hearing**
- **Final Written Decision**

---

- **3 months**
- **No more than 3 months**
- **3 months**
- **3 months**
- **1 month**
- **Hearing Set on Request**
- **Period for Observations & Motions to Exclude Evidence**

---

- **No more than 12 months**

[Diagram showing the process with time periods and steps]
Lessons Learned: Joinder

• Must be a like review proceeding

• Requires filing a motion and petition

• File within one month of institution

• Impact on schedule important

• *Dell v. Network-1, IPR2013-00385 (Paper 17)(joinder granted)*

• *Sony v. Network-1, IPR2013-00386 (Paper 16)(joinder denied)*
Discovery

Discovery Period

- Petition Filed
- PO Preliminary Response
- Decision on Petition
- PO Response & Motion to Amend Claims
- Petitioner Reply to PO Response & Opposition to Amendment
- PO Reply to Opposition to Amendment
- Oral Hearing
- Final Written Decision

3 months → No more than 3 months → 3 months → 3 months → 1 month → Hearing Set on Request

PO Discovery Period → Petitioner Discovery Period → PO Discovery Period → Period for Observations & Motions to Exclude Evidence

No more than 12 months
Types of Discovery


• Routine Discovery
  – Cited exhibits
  – Cross-examination of witnesses
  – Inconsistent information

• Additional Discovery
Lessons Learned: Additional Discovery

- Five factor test used in evaluating additional discovery requests (IPR2012-00001, Garmin v. Cuozzo (Paper 26)):
  1. More than a possibility and mere allegation must exist that something useful might be found.
  2. Is the request merely seeking early identification of opponent’s litigation position?
  3. Can party requesting discovery generate the information?
  4. Interrogatory questions must be clear.
  5. Are requests overly burdensome to answer?

- Requests for specific documents with a sufficient showing of relevance are more likely to be granted whereas requests for general classes of documents are typically denied.
Lessons Learned: Depositions

• Federal Rules of Evidence apply

• Objections to admissibility waived

• Follow the Testimony Guidelines (Practice Guide Appendix D)
  – No “speaking” objections or coaching
  – Instructions not to answer are limited

• Foreign language/country. See Ariosa v. Isis, IPR2013-00022 (Papers 55, 67)
Motions-to-Amend

- Board conference required
- Normally one-for-one claim substitution
- Must narrow scope
- Need to show patentable distinction
- Clearly state the contingency of substitution

Motions-to-Amend

• Unlike during examination, PTAB does not “examine” amended claims during an AIA proceeding
  – No search is conducted
  – No claim rejections made

• Burden is on the movant (i.e., the patent owner) to show the patentable distinction of the proposed amended claim
Oral Hearing

- Petition Filed
- PO Preliminary Response
- Decision on Petition
- PO Response & Motion to Amend Claims
- Petitioner Reply to PO Response & Opposition to Amendment
- PO Reply to Opposition to Amendment
- Oral Hearing
- Final Written Decision

Timeline:
- 3 months
- No more than 3 months
- 3 months
- 3 months
- 1 month
- Hearing Set on Request

Additional Steps:
- PO Discovery Period
- Petitioner Discovery Period
- PO Discovery Period
- Period for Observations & Motions to Exclude Evidence

Total Duration: No more than 12 months
Lessons Learned: Oral Hearing

• Attorneys should bear in mind that:
  – Panel may have more than three judges;
  – Some panel members may participate by video; and
  – All questions from the judges are based on the written record, including arguments made in the parties’ briefs and expert testimony filed in support of the parties’ briefs

• Attorneys should be prepared to answer questions about the entire record, including claim construction, motion to amend, priority, secondary consideration and swearing-behind issues
  – Have sufficient familiarity with the record to answer questions effectively; and
  – Be ready to deviate from a prepared presentation to answer questions
Lessons Learned: Oral Hearing

- Attorneys should focus on the best argument and not try to cover every argument made during the course of the trial.

- No new evidence or argument is permitted.

- Demonstrative exhibits should serve merely as visual aids.
  - Pages of the record, with appropriate highlighting (e.g., highlighted figures), are effective and could be very helpful.
  - When referring to slides, identify the number of the slide rather than say “this slide” or “next slide.”
Settlement and Termination

- Petition Filed
- PO Preliminary Response
- Decision on Petition
- PO Response & Motion to Amend Claims
- Petitioner Reply to PO Response & Opposition to Amendment
- PO Reply to Opposition to Amendment
- Oral Hearing
- Final Written Decision

- 3 months
- No more than 3 months
- 3 months
- 3 months
- 1 month
- Hearing Set on Request

- PO Discovery Period
- Petitioner Discovery Period
- PO Discovery Period
- Period for Observations & Motions to Exclude Evidence

No more than 12 months
Lessons Learned: Settlement

• Parties may file a joint motion to terminate a proceeding on the basis of settlement
  – Preauthorization is required; and
  – May be filed at any stage of the proceeding, even before institution
    • If the proceeding is terminated before institution, petitioner may file a request for refund of post-institution fee

• Board has discretion to proceed to final written decision, especially at an advanced stage when all briefing is complete

• Board is more likely to grant early motions to terminate
Lessons Learned: Settlement

• When there are multiple petitioners, proceeding may be terminated with respect to one petitioner when that petitioner settles with patent owner

• Joint motion to terminate must be accompanied by a true copy of the settlement agreement; a redacted version is not permitted

• Parties may request that the settlement agreement be treated as business confidential information
  – See § 42.74(c) and FAQ G2
Final Written Decision

- Petition Filed
- PO Preliminary Response
- Decision on Petition
- PO Response & Motion to Amend Claims
- Petitioner Reply to PO Response & Opposition to Amendment
- PO Reply to Opposition to Amendment
- Oral Hearing
- Final Written Decision

- 3 months
- No more than 3 months
- 3 months
- 3 months
- 1 month
- Hearing Set on Request
- PO Discovery Period
- Petitioner Discovery Period
- PO Discovery Period
- Period for Observations & Motions to Exclude Evidence

No more than 12 months
PTAB Website
Revised PTAB Website
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