Exploring the "Patent Agent Privilege" Proposal and Its Anticipated Impacts on PTAB Proceedings

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For more information on Buchanan's Patent Office Litigation services, visit www.BIPC.com.

Cooley LLP is a full service law firm with 900+ lawyers across 12 offices in the United States, China and Europe. Cooley's combination of experience allows us to develop a comprehensive strategy that considers the broader implications of PTAB proceedings on concurrent district court litigation. We have handled 250+ PTAB and Patent Office proceedings across disparate industries covering tech and life sciences. As a top 5 law firm for PTAB proceedings and a top 10 law firm for patent litigation defense (Docket Navigator), Cooley is well-positioned to advise clients on the strategic use of post-grant proceedings within the context of concurrent litigation.

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Brief Speaker Bios:

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Buchanan Shareholder S. Lloyd Smith focuses his practice on intellectual property litigation and enforcement matters. His case experience includes trademark infringement, false advertising, patent infringement, and unfair competition trials and litigation in various venues nationwide. He has argued before numerous U.S. District Courts nationwide, the U.S. Court of Appeals for the Federal Circuit and the Third Circuit, and the U.S. International Trade Commission.

Lloyd is co-chair of the firm's Intellectual Property Litigation group, chair of the firm's practice group for litigation in the U.S. District Court for the Eastern District of Virginia, and a member of the firm's Patent Office Litigation group.

Cooley LLP
Britton Davis
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Britton Davis is a senior associate in Cooley LLP's Intellectual Property Litigation group. His practice focuses on patent disputes in cases involving complex technologies. Brit has experience in all phases of patent litigation on behalf of both plaintiffs and defendants. He also represents both patent owners and petitioners before the U.S. Patent Trial and Appeal Board in post grant proceedings under the AIA, including helping to secure rare complete patent owner wins in inter partes review proceedings on all claims under review.

Brit is a contributing editor to Cooley's PTAB digest, a leading resource which tracks and analyzes PTAB decisions, and has written and presented about PTAB practice and the intersection with Constitutional Due Process and the APA. Brit received his JD, with honors, from the University of Texas School of Law.

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The United States Patent and Trademark Office (USPTO) has proposed a rule that would recognize a privilege for certain communications between U.S. patent agents or foreign non-attorney patent practitioners and their clients, to the same extent as communications between clients and U.S. attorneys. It would replace the current patchwork of common law, which requires a complex fact-based analysis to decide privilege questions.

In this LIVE Webcast, a panel of thought leaders brought together by The Knowledge Group will discuss how and to what extent the rule would protect communications from discovery in trial practice at the USPTO and the Patent Trial and Appeal Board (PTAB), including inter partes review, post-grant review, the transitional program for covered business method patents, and derivation proceedings under the Leahy-Smith America Invents Act (AIA).

Key topics include:

- Discovery
- Inter Partes Review
- Post-Grant Review
- Business Method Patents
- Leahy-Smith America Invents Act
- Communications Covered
- Jurisdictional Limitations

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Origin of Privilege in Federal Courts

- Rule 501 of the Federal Rules of Evidence:

  The common law—as interpreted by United States courts in the light of reason and experience—governs a claim of privilege unless any of the following provides otherwise:
  - the United States Constitution;
  - a federal statute; or
  - rules prescribed by the Supreme Court.

  But in a civil case, state law governs privilege regarding a claim or defense for which state law supplies the rule of decision.

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Privilege in Federal Courts is an evolving doctrine

- "Rule 501 of the Federal Rules of Evidence authorizes federal courts to define new privileges by interpreting 'common law principles.'" *Jaffee v. Redmond*, 518 U.S. 1, 8 (1996).
- Rule 501 "did not freeze the law governing the privileges of witnesses in federal trials at a particular point in our history, but rather directed federal courts to 'continue the evolutionary development of testimonial privileges.'" *Jaffee,* 518 U.S. at 8–9

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Privilege for Patent Prosecution Communications

- Before 1970, some courts were hesitant to apply attorney client privilege to patent prosecution activities
- Today courts agree that communications between an attorney and a client regarding patent prosecution are privileged

Comments of Prof. John T. Cross, Univ. of Louisville, to PTAB re the possible adoption of patent agent privilege (August 20, 2015)

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Background of Patent Agent Privilege

- District Courts were split on whether a privilege existed for Patent Agents
  - Districts recognizing patent agent privilege: C.D.Cal., D.D.C., E.D. Mich, W.D. Mich., and D.N.J.
  - Districts declining to recognize patent agent privilege: D.Md., S.D.Cal., S.D.N.Y., and D.Mass.
  - N.D. Ill. had decisions going each way

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Avoiding uncertainty with Patent Agent Privilege

- In response to the unsettled nature of patent agent privilege, many firms included at least one attorney on all client communications to ensure the existence of a privilege

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The Federal Circuit Recognized Patent Agent Privilege in March 2016

- In a 2-1 decision, CAFC recognized a patent agent privilege for communications between registered patent agents and clients provided the communication is necessary for the preparation of a USPTO filing.
  - *In re Queens Univ. at Kingston*, 820 F.3d 1287 (Fed. Cir. 2016)
- Panel grants writ of mandamus directing district court to rescind order compelling production of documents containing communications between the patent agents of the University and non-lawyer officials and inventors

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Scope of Patent Agent Privilege under *In re Queens Univ.*

- Communications are protected so long as (1) they are between the client and the patent agent; (2) they are kept in confidence; and (3) they are within the work authorized by Congress under 37 C.F.R. § 11.5(b)(1)

In re Queens Univ., 820 F.3d at 1301

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Patent Agent Privilege covers

- Communications in furtherance of, or reasonably necessary and incident to:
  - Consulting and giving advise in contemplating filing a patent application *or other document* with the PTO;
  - Preparing and prosecuting patent applications (e.g., drafting specifications and claims, responding to office actions);
  - Drafting a communication for a public use, interference, reexamination, *petition*, appeal to, or any other proceeding *before the PTAB*, or other proceeding.

In re Queens Univ., 820 F.3d at 1301

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Outside the Scope

- Communications with a patent agent relating to:
  - Validity opinions on another party's patents in contemplation of litigation or for the sale or purchase of a patent;
  - Opinions on infringement.

In re Queens Univ., 820 F.3d at 1301-02


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What else is outside the scope?

- Dissent notes reexamination allows patent agent to consult on validity of another's patent
  - Probably extends to IPR, PGR
- Dissent also notes a patent agent's limited ability to prepare an assignment and ambiguity of the privilege
- Determination of the scope of patent agent privilege is the practice of law and beyond a patent agent

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How did the CFAC reach *In re Queens Univ.*

- Choice of law: For questions of substantive patent law, the CAFC applies its own precedent.
  - Determines that document production related to infringement and validity is analogous to withholding documents relating to same issues
- Mandamus appropriate because it was:
  - an issue of first impression and privilege lost if applicable;
- Agrees that new privileges should be found sparingly
  - Applies the reason and experience test from *Jaffe v. Redmond*, 518 U.S. 1, 8 (1996)
  - Recognizes that the AC privilege exists and is the most fundamental
  - Also recognizes that other similar communications from non-attorney client advocates are not privileged (e.g., accountants)

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***Sperry* as a Basis**

- *Sperry v. State of Florida ex rel. Florida Bar*, 373 U.S. 379 (1963) prohibited Florida Bar from exercising control over patent agents under guise of unlawful practice of law
  - Held that patent counseling by agents is the practice of law
  - But denied Florida Bar the right to control holding that it is a purely Federal right conveyed by statute

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Dissent in *Queen's Univ.*

- Disputed need for a privilege
  - Use of supervising attorney
  - Document retention policy to delete communications
- Questioned role of CAFC to create a privilege
  - 1928 testimony of patent commissioner denying a patent agent privilege, undisturbed by legislation
- *Sperry* noted differences between attorneys and patent agents; difference should continue
- Questioned how workable the scope of the new privilege will be

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Application of *In re Queens Univ.*

- *Verinata Health, Inc. v. Ariosa Diagnostics, Inc.*, No. 12-cv-05501-SI (N.D. Cal. July 05, 2017)
  - Invention disclosure forms are protected under the privilege
  - The remainder of the communication not directed to invention disclosure is not privileged

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State Court Limits

- A Texas appellate court refused to apply *Queen's University* to a state contract dispute regarding a patent license
  - *In re Silver*, 119 U.S.P.Q.2d 1758 (Tex. App.-Dallas 2016)
- With no privilege, *all* communications with a patent agent have to be disclosed.
- The panel split 2-1, with the dissent countering that *Queen's University* applies
- Texas Supreme Court will hear the case

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Regional circuit law governs waiver of the privilege

"[T]his court applies Federal Circuit law to determine whether the documents at issue are [covered by the privilege]. *Regional law, however, applies to procedural questions* where 'any patent involved [is] irrelevant to the question of privilege.' Therefore, *the question of whether and when privilege or protection has been waived*—which does not relate to any substantive issues but rather the actions of the parties—*implicates regional Fifth Circuit law*."

Barry v. Medtronic, Inc., 2016 WL 7665426, at *1 (E.D. Tex. Oct. 31, 2016) (citing *In re Spalding Sports Worldwide, Inc.*, 203 F.3d 800, 803 (Fed. Cir. 2000); *GFI, Inc. v. Franklin Corp.*, 265 F.3d 1268, 1272 (Fed. Cir. 2001); *Nguyen v. Excel Corp.*, 197 F.3d 200, 206 (5th Cir. 1999)).

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Foreign Agents and Attorneys

- Communications with foreign patent agents and attorneys are based on a choice of law approach and analysis of the laws of those jurisdictions.
- The majority in *Queen's University* lodged the privilege in Congress' authorization of patent agents
- Foreign practice is likely unchanged

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Germany – Robust Privilege

- German Code of Civil Procedure § 383, 6 provides a robust privilege for patent agents and patent attorneys
- Recognized in
  - *Softview Computer Prods. Corp. v. Haworth Inc.*, No. 97 CIV. 8815 KMWHBP, 2000 WL 351411, at *11 (S.D.N.Y. Mar. 31, 2000).
  - *Heidelberg Harris, Inc. v. Mitsubishi Heavy Industries, Ltd.*, No. 95 Civ. 0673, 1996 WL 732522, at *10 (N.D. 111. Dec. 18, 1996).

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France – Limited Privilege

- Due to 2004 change in law, privilege likely only for outside counsel
- No privilege found in *Bristol-Myers Squibb Co. v. Rohen-Pulenc Rorer Inc.*, 52 U.S.P.Q. 2d 1897 (SDNY 1999).
- In 2004, Article L. 422-11 provides professional secrecy for Industrial Property Attorneys
  - Does not apply to in-house attorneys
  - Some privilege will probably be recognized for outside counsel

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Japan – Limited Privilege

- Privilege only for outside patent agents and attorneys
- Japan's 1996 Code of Civil Procedures provides a privilege for non-lawyer Japanese patent agents
- Recognized in *Eisai Lt. v. Dr. Reddy's Laboratories Inc.*, 77 U.S.P.Q. 2d 1854 (SDNY 2005)

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Korea – No Privilege for Agents

- *Astra Aktiebolag v. Andrx Pharm., Inc.*, 208 F.R.D. 92 (S.D.N.Y. 2002) recognized a privilege based on then existing Korean discovery rules
- The discovery rules later changed and the Korean Supreme Court denied the existence of a broad privilege
- Korea has a privilege retained by the attorney only for communications from the client to the attorney
- Likely no privilege today

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USPTO Proposed Rule

- Provides a robust privilege for patent agents and foreign patent practitioners before the PTAB in IPRs, PGRs, CBMs and derivation proceedings
- Privilege would attach as if the subject communications were between a client and a US attorney

Proposed on October 8, 2016

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USPTO Proposed Rule would cover:

- Communications "reasonably necessary or incident to scope of patent practitioner's authority" protected as if it was between a client and a US attorney

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Recap

- Federal Circuit has recognized patent agent privilege for actions related to practice before the PTO
  - Likely extends to practive before the PTAB in IPRs, PGRs, and CBMs
- State law recognition of the privilege is unsettled
- The PTO has proposed rules for a robust patent agent privilege
- Foreign practice is likely unchanged

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