State Bar of Georgia

Intellectual Property Law Section

DOUGLAS M. ISENBERG, CHAIR FALL 2005 ALISON DANACEAU AND HUNTER YANCEY, EDITORS

Section Works to Serve You

by Douglas M. Isenberg
The GigaLaw Firm

My primary interest as chair of our Intellectual Property Law Section for 2005-06 is ensuring that our growing section serves our members well. How, exactly, we do that is not always clear, but we're certainly keeping quite busy trying.

For example, in September we held our first-ever "open house" – where we combined a happy hour with brief presentations by the chairs of our section's numerous and active committees. The open house – organized by Social Committee Chair Shane Nichols at King & Spalding's offices – provided a great opportunity for section members to learn about what we do and to sign up for participation in a committee to help ensure our programming serves our members. The event attracted many newcomers who hopefully will become more involved in our section's work – something that should serve the section well and prove rewarding for the attorneys themselves. If you want to get involved in any committee, please feel free to contact the appropriate committee chair at any time (they're listed in this newsletter). I know the committee chairs will be happy to hear from you, and you'll be glad you did.

Our annual IP Institute became a sold-out event with a record number of speakers and sponsors. We raised an amazing $22,500 from 15 sponsors – pulling the IP section out of a budget shortfall, more than covering the costs associated with the Institute and allowing us to offer more free and low-cost events in our own backyard. Given the enormous benefit these sponsors provided, I want to thank them directly here: Computer Packages; CPA North America; Internet Patent News Service; Kramer & Amado; and Wolter Kluwers Law & Business (all gold sponsors) and Hoglund & Pamias; InspiroMEDIA; LAVA Group; Miller Ray Houser & Stewart; Navigant Consulting; Smith Frohwein Tempel Greenlee Blaha; Stone Consulting Services; TrialGraphix; TyMetrix; and VeriSign (all silver sponsors).

I also want to thank those members of the IP Section who successfully solicited these sponsors: Michael Bishop, Griff Griffin, Greg Kirsch and Steve Wigmore.

As usual, the IP Institute provided a full year's worth of CLE credit while offering attendees a unique networking opportunity. Plus, we were privileged this year, for the first time, to have two federal judges – Hon. Francis Allegra of the U.S. Court of Federal Claims and Hon. Randall Rader of the U.S. Court of Appeals for the Federal Circuit – accept our invitations and speak together on a panel at the Institute. We also had speakers from companies with important intellectual property interests – including BellSouth, Microsoft, Red Hat and the Recording Industry Association of America – as well as attorneys from nearly 20 law firms.

In addition to the popular IP Institute, our committee chairs have been busy already this fiscal year planning a number of educational events, as you can read about elsewhere in this newsletter. Among other things, we've held programs on the impact of the *Phillips* case; IP-related indemnities, warranties and representations; domain name disputes and trademark issues, the technological arts rejection in patent law; and trademark due diligence in corporate transactions. Plus, as I write this, we're planning additional programs on important issues of interest to copyright practitioners, in-house counsel, litigators and those whose work includes licensing intellectual property.

And, on Jan. 5, the section will offer a full-day of CLE programming – as well as a business lunch – at the State Bar's Midyear Meeting at the Renaissance Waverly Hotel.

Finally, to help make certain our section is serving you well, we are planning to conduct a survey of all members soon. Our section has grown to nearly 900 members, and we often make assumptions as section leaders about who our members are and what they want. Hopefully, this survey will help us answer those questions more accurately, so we can serve you even better. When you receive the survey, please respond. As section chair, I welcome any comments at any time, so please let me know what we're doing right and what we can do better. I can be reached via e-mail at disenberg@GigaLawFirm.com or via phone at (404) 256-0610. •

Did Google Just Sell Your Client's Trademark to a Competitor?

by Trenton Ward (Troutman Sanders LLP)

It's the middle of a hectic day at the office; you'll need to clone yourself to finish the day's tasks but you see that all important number on your caller ID - the client for whom you hold everything. You pick up the phone to the sound of your favorite general counsel barking in your ear about a major problem. Apparently their CEO was just informed that a search of the company's trademark on Google generates a results page with a smattering of sponsored links to their most hated competitors. Your client is furious that after heavily investing in its trademark, competitors can now use this mark to attract customer's seeking your client's product. What can you do to make Google stop?

It's not so hard to imagine yourself in this situation. Is your phone about to ring? Stop reading for a moment and "Google" your most treasured client's trademark. Were there any competitors listed in the result page? If so, you need to be aware of recent case law that may not leave your client in as favorable of a position as you would like.

In *GEICO v. Google, Inc.*, Judge Leonie Brinkema recently handed down her long awaited opinion concerning Google's "AdWords" advertising program. 2005 U.S. Dist. LEXIS 18642 (E.D. Va. 2005). Judge Brinkema conducted a bench trial on Dec. 15, 2004 and then held the intellectual property bar in suspense for almost eight months before issuing an opinion on Aug. 8, 2005. The end result is an increase in the barrier to those seeking to challenge search engine keyword advertising programs, but, at the same time, an expansion of the scope of two trademark elements needed to succeed on infringement.

The controversy in *GEICO* surrounded an advertising program, which allows companies to place bids on keywords. Those companies which bid high enough for a particular keyword can have their results displayed in a Sponsored Link section of the result page when a query is performed on that keyword. The court determined the legality of this "AdWords" program by analyzing it in light of the four factors of trademark infringement. Unlike the Second Circuit's decision in the analogous case of *1-800 Contacts, Inc. v. WhenU, Inc.*, the *GEICO* court found that Google's sales of GEICO's trademarks as keywords constituted a use of the mark by the defendant (factor two) in commerce (factor three). Therefore, the only factor separating Google from infringement liability was whether the use resulted in a likelihood of confusion (factor four). Here is where Judge Brinkema raised the bar for those seeking to challenge Google. Even though GEICO's survey showed that 69.5 percent of those surveyed thought the Sponsored Links were affiliated with GEICO, the court found that there was no likelihood of confusion with respect to Sponsored Links that did not reference GEICO. The court scrutinized the survey conducted by GEICO and found it to be inaccurate and unreliable.

We are left to wonder whether Google's AdWord program remains valid simply due the lack of a reliable survey. If an ideal situation was presented in which an impenetrable survey was conducted and proffered, could the sale of trademarks as keywords be found to be infringing?

The line as to where acceptable trademark use ends and infringement begins is unclear, but Google appears to have succeeded in its latest attempt to encroach further into the realm of trademark protection. This latest encroachment resulted from a change in Google's policies in August 2004 to allow companies to bid on all keywords, including registered trademarks like GEICO. Some commentators have speculated that Google's new policy has a direct relation to the fact that its profits for 2005 are double that of 2004. The marketplace obviously feels that there is value in Google's AdWords program as its stock has ballooned almost $100 a share since the *GEICO* decision, bringing its overall cash value to an estimated $7.6 billion. This explosion in growth spurns questions regarding the legitimacy of the practices of this new advertising giant. Your client may very well pose the question to you: "Isn't Google trading off the value of my mark and must I bid against my competitors for my own trademark?"

It appears that the structure of Google's own AdWord program illustrates its dependence on the value of a particular trademark. The program encourages competitive bidding for highly desired keywords or keyword phrases. One can easily speculate that the bid amount for the keyword phrase "APPLE COMPUTERS" cost a great deal more than the keyword phrase "RAISIN COMPUTERS."

The difference in the bid amount is directly proportional to the value of the trademark in the marketplace, and thus the trademark owner's investment in that mark. Therefore, as a company's investment in its trademark increases, so does Google's profit.

It is easy to imagine the hypothetical in which a company, unhappy with its placement in the organic results of a Google search, would be forced to bid against its competitors to achieve a high placement in the Sponsored Link section. It is also not difficult to imagine that the appearance of

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Picture This: IP Law Section Events

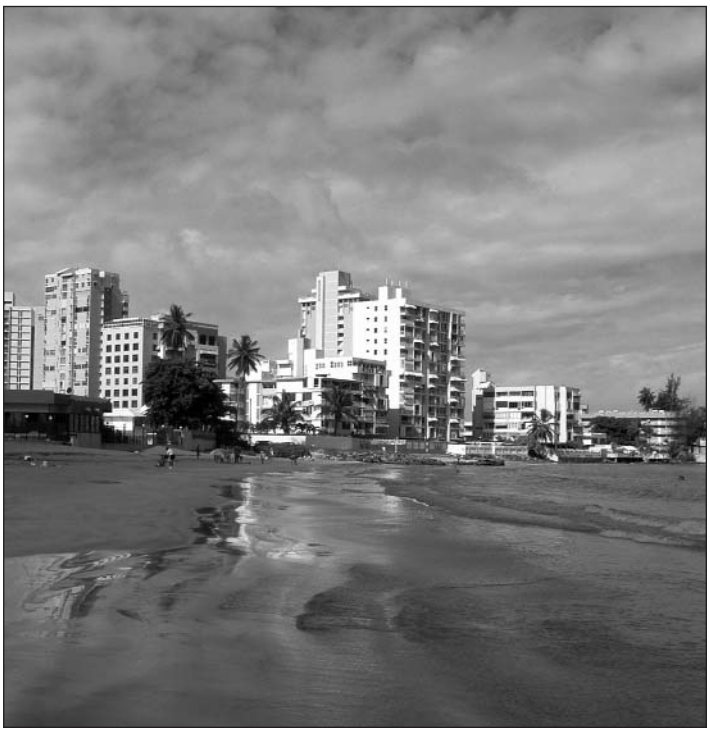
The 2005 IP Institute was held at the Ritz-Carlton Hotel, Spa & Casino in Puerto Rico.

Doug Isenberg, Todd McClelland and Alex Fonoroff at a committee meeting.

Griff Griffin, Philip Burrus and Doug Isenberg at the 2005 IP Institute in San Juan, Puerto Rico

Judge Francis Allegra of the U.S. Court of Federal Claims and Judge Randall Rader of the U.S. Court of Appeals for the Federal Circuit.

Philip Burrus, John Renaud and Griff Griffin at the executive committee dinner in summer 2005.



Phillips Discussion Held by Litigation and Patent Committees

by Philip Burrus (Burrus Intellectual Property Law Group) and Tina McKeon (Needle & Rosenberg P.C.)

For those "baffled by *Phillips*," the section's Patent and Litigation committees came to the rescue with a luncheon discussion of *Phillips v. AWH Corporation*, 415 F.3d 1303 (Fed. Cir. 2005) (*en banc*), on Sept. 22 at the Peachtree Club in Atlanta. Thanks to a wonderful presentation by Larry Nodine of Needle and Rosenberg P.C., and Eric Hanson of Smith, Gambrell and Russell, LLP, attendees were shown the "right angle" on understanding the case.

The presenters discussed the case both from the view of a prosecutor drafting patent applications and a litigator asserting or defending a patent in court. Eric began the presentation with an overview of *Phillips*, providing both a substantive and procedural briefing of the case. Larry then followed with a discussion of judicial reactions to *Phillips*. Eric then gave advice on the impact to application drafting. Larry closed the presentation with a discussion of follow-up cases that applied *Phillips* in claim interpretation.

After providing an overview of the case, Eric's discussion of its impact to attorneys who prepare and prosecute patent applications was very informative. "You should review the specification and the use of claim terms for consistency," Eric said, recommending that practitioners pay particular attention to claim context and claim differentiation when drafting. "It may be good to include many examples and several alternate embodiments, too." Eric even asked the audience whether, in light of the *Phillips* case, they would consider filing Continuation-In-Part applications with the purpose of clarifying claim terms.

Being an *en banc* decision, Larry recognized the significance, but pondered, "Isn't this just another in a series of claim interpretation cases? Does it really change the world? I'm not sure." His review of the reactions to *Phillips* was interesting. For example, his questioning of the case was echoed by Judge Susan G. Braden of the U.S. Court of Federal Claims in Washington, D.C, whom he quoted as saying, "*Phillips* was 'much ado about nothing.' The decision was 'basically a yawn' because the dictionary-first methodology of Texas Digital had not been followed by most panels for some time." He noted that the case may even cause more confusion for trial court judges, as the majority panel said nothing about trial court deference in the *Phillips* decision.

One of the most interesting parts of the luncheon was the discussion of cases since *Phillips*. For example, one case discussed was *Nystrom v. Trex*, 2005 U.S. App. LEXIS 19748 (Fed. Cir. Sept. 14, 2005 2005), in which the Federal Circuit panel withdrew an earlier opinion and rendered a substitute opinion in light of the *Phillips* case. In *Nystrom*, the issue was from what materials a board may be made. The case was slightly different from *Phillips* because in *Nystrom* the plaintiff wanted to broaden a narrow term – i.e., they wanted to broaden the term "board" to include both wood and synthetic materials.

In *Phillips*, by contrast, the defendant wanted to narrow the term "baffle," whose definition was stipulated. Larry noted that, in light of *Phillips*, *Nystrom* illustrated a shift from dictionary primacy to specification primacy, but that meaning and scope need not be disavowed during prosecution for a meaning to be limited. As he pointed out, the court decided *Nystrom* by saying, "Broadening of the ordinary meaning of a term in the absence of support in the intrinsic record indicating that such a broad meaning was intended violates the principles articulated in *Phillips*."

About the speakers: **Eric Hanson** is an associate in the intellectual property section of Smith, Gambrell and Russell, LLP. He is a graduate of Tulane Law School, where he served on the Law Review and was elected to the Order of the Coif. His practice centers on domestic and international patent prosecution. He specializes in software, telecommunications, medical treatment systems and Internet systems and methods.

Larry Nodine is a shareholder at Needle & Rosenberg, P.C., where he practices in intellectual property litigation and counseling and leads the Litigation practice at the firm. Larry graduated from Emory University Law School, where he received the William Agnor scholarship. Prior to private practice, he worked in the Staff Attorney's Office of both the Fifth Circuit US Court of Appeals and the Eleventh Circuit Court of Appeals. He is a domain name panelist for the World Intellectual Property Association and was voted a "Super Lawyer" by his peers in Atlanta Magazine in both 2004 and 2005.

About the committees: The **Litigation Committee** is chaired by **Tina McKeon** of Needle & Rosenberg, P.C., and the **Patent Committee** is chaired by **Philip Burrus** of the Burrus Intellectual Property Law Group.

For more information, or to suggest future topics, contact Tina at tmckeon@needlerosenberg.com, or Philip at pburrus@burrusiplaw.com. •

Google

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competitor's links will create some confusion to the searcher, even if it is only initial confusion. Yet, as the Ninth Circuit informed us in *Brookfield Communs., Inc. v. West Coast Entertainment Corp.*, even initial interest consumer confusion is a misappropriation of the trademark owner's goodwill. 174 F.3d 1036, 1064 (9th Cir. 1999).

While no U.S. court has found against Google's sales of trademarks as keywords, new challengers are popping up across the country. The Northern District of California is currently entertaining a complaint by American Blind & Wallpaper Factory on grounds similar to *GEICO*.

While new challengers line up, you can appease your angry client by informing the client that Louis Vuitton was successful in receiving a judgment from a French court and stopping Google from displaying ads for Vuitton's competitors when a query was performed on Vuitton. How about advertising in France? •

Litigation Committee Report

by Tina McKeon (Needle & Rosenberg P.C.)

The Litigation Committee is off to an active start. We co-hosted a luncheon seminar, along with the Patent Committee, on Sept. 22, 2005, regarding the recent *en banc* decision of the Federal Circuit related to claim interpretation and the use of dictionaries (*Phillips v. AWH Corporation*, 415 F.3d 1303 (Fed. Cir. 2005)). We also participated in planning an electronic discovery session at the IP Institute in San Juan in November.

Plans for a January luncheon, hosted by Jones Day, are underway. The seminar will address warning letters – how to write them and what to do when your client receives one. These initial letters are relevant to pre-litigation practice and set the stage for defenses and damage awards in litigation. Unfortunately, the importance of the letter and the response may be overlooked by busy practitioners. Thus we hope the seminar will be helpful to young associates and non-litigation attorneys, as well as seasoned litigation veterans. We will provide details soon, so watch for the announcement.

We have ideas for future events but are always open to suggestions. If you are interested in getting involved, we welcome your participation. Please feel free to contact me with your ideas for future seminars or about your interest in participating as an active member of the Litigation Committee. •

Licensing Committee Update

by Steve Wigmore (King & Spalding LLP)

We are looking forward to this year in providing some interesting and valuable licensing programs. Our first program that is tentatively scheduled for January 2006 will focus on Open Source Licensing issues surrounding software. This program will provide practical insight on common issues and how these issues may be addressed.

The next program that we intend to provide in early Spring 2006 is Fundamentals of Intellectual Property Licensing. This program will be designed for those IP Section Members who do not have a significant amount of experience in licensing. The program will provide the basics of any intellectual property license.

We may also provide one or two additional programs that have a specific focus such as on patent licensing or trademark licensing. If you have any ideas for a program or wish to become a member of the licensing committee, please feel free to contact the Licensing Committee Chair, Steve Wigmore via e-mail at swigmore@kslaw.com or phone at 404.572.2884.

We look forward to seeing you at one of our upcoming programs! •

Drawings: Clear as Mud

by Philip Burrus
Burrus Intellectual Property Law Group

How much information should you include in the drawings of a patent application? After all, 35 USC §113 says, "Applicant shall furnish a drawing where necessary for the understanding of the subject matter sought to be patented." MPEP §601.01(f) says that an application need not include a drawing where the specification does not refer to a drawing and a drawing is not necessary for understanding the invention. In fact, that same section says that process and method claims, claims for coated articles and claims for laminated structures, to name a few, generally do not need drawings to understand the invention. What's more, according to MPEP §601.01, an application is complete with only a description and a claim. So drawings are sometimes optional, right?

Well, statutorily speaking, in theory, perhaps. But as anyone who has ever tried to file an application without drawings knows, that practice immediately draws an objection for non-compliance with 37 CFR 1.83, which states, "The drawing in a nonprovisional application must show every feature of the invention specified in the claims." Wait a minute here. An application is complete with only a description and a claim. So no drawing is needed. Yet at the same time, anything in the claims is required to be shown in the very same drawing that you said isn't necessary? What, are we using invisible ink or something? That's as clear as mud.

Now, when you cry uncle and simply concede to prepare a drawing for every application, how much information should you include? What about environmental elements? Are they necessary to understand the invention? Are you dedicating anything to the public by showing it and not claiming it? Which elements can be represented by generic blocks, and which must be shown in detail? Is the particular element really enabled by the drawing?

It's just this kind of subject that the Patent Committee tries to get experts to tackle at our events. The Patent Committee hosts six to eight events a year that attempt to shed light on these and other patent related issues. Many of the events are luncheon roundtables that not only provide an opportunity to learn and stay current on patent related issues, but also provide a forum to meet other practitioners.

The events generally fall into one of three buckets: staying current; filling the toolbox; and deep dives. In the staying current category, discussions of recent cases, new legislation and rules updates help to keep you abreast of changes in the law. For example, the Patent Committee and Litigation Committee recently held a lunch discussion of the *Phillips* case at the Peachtree Club. In the filling the toolbox category, issues like claim drafting, interference practice and appellate practice are covered in roundtables and similar meetings. The deep dive category is one that is being considered for 2006. It would be an intensive course, perhaps a day long, in patent practice. As so many advanced patent training courses require travel, the committee is considering whether it would be beneficial to have one here in Atlanta, provided there is sufficient interest.

Proposed topics for the upcoming year include effective patent drawings, defensive matters (e.g. what to do when your client gets a cease and desist letter) and opinion drafting. Our committee tries to uncover topics and to host events that are tangible, relevant and beneficial to the intellectual property attorneys of Georgia. To do this, we need your help. If you would like to participate on the committee, or if you have ideas for topics, or if your company or firm would like to host an event, feel free to contact me at pburrus@burrusiplaw.com. I look forward to seeing you at one of our events! •

Copyright Committee Report

by Alex Fonoroff (Kilpatrick Stockton LLP)

The Copyright Committee is looking forward to providing a range of copyright focused programs for the members of the IP Section. As in past years, the committee expects to organize programs on a variety of copyright topics for all interest and skill levels–from the advanced copyright practitioner to the trademark or patent attorney interested in spotting copyright issues.

Along with the YLD, the Copyright Committee will sponsor one hour on copyright basics as part of a three hour IP basics CLE program at the Bar's Midyear Meeting. Also at that meeting, the Copyright Committee will host a one hour session covering an update of copyright law over the previous year. In addition to these programs, the Copyright Committee intends to organize other programs that may include a presentation on copyright issues related to architectural works and building plans and a panel discussion on the effects of the Supreme Court's recent decision in Grokster.

The Copyright Committee is always interested in ideas for additional programs and people willing to take on an active role in the committee. If you are interested in joining the committee, and have not already done so, send your contact information to Alex Fonoroff, the chair of the Copyright Committee, at afonoroff@KilpatrickStockton.com. •

Trademark Committee Update

by Brad Groff (Gardner Groff P.C.)

The Trademark Committee hosted an Update on Internet Domain Name Dispute Proceedings program on Oct. 25 at the Bar Center. Mark Seigel moderated a panel including Steven Jampol, Candice Decaire, and our illustrious section chair, Doug "more than just a figurehead" Isenberg. The panelists' experiences in domain name dispute proceedings, both as counsel for involved parties and as a WIPO arbitration neutral, made for a very informative discussion of the advantages and disadvantages of litigation vs. arbitration, alternative arbitration forums, and the differing procedures and remedies available.

We also planned a program with the In-House Committee on the topic of Trademark Due Diligence in Corporate Transactions on Dec. 14. Joan Dillon moderated a panel including Michael Bishop, Alex Douglass, Tiffany Easton and Nancy Gardner. The panel's combination of in-house and out-house experience made it enlightening and useful.

Michael Hobbs and Brad Groff will be presenting advanced and basic trademark CLE programs, respectively, jointly hosted by the IP Section and the Younger Lawyers Division at the State Bar Midyear Meeting on Jan. 5. Stay tuned for announcements of more great programs coming up in 2006. If you have suggestions for trademark-related programs that you would like to see, please pass them along to Brad Groff at bgroff@gardnergroff.com. Or better yet, join the Trademark Committee and help out however you can. •

In-House Committee Update

by Clifford S. Stanford (Federal Reserve Bank of Atlanta)

The In-House Committee recently held two functions at the Bar Center for in-house counsel intellectual property law attorneys.

On Oct. 26, the committee hosted a very successful panel discussion titled "IP-Related Indemnities, Representations, and Warranties." The panel included Bob Currie of Georgia Pacific, Sandra Cuttler of Earthlink, Robert Dulaney of Home Depot, and Geoff Sutcliffe of BellSouth, moderated by Scott Petty of King & Spalding.

The panelists engaged in a lively discussion of IP contract provisions, touching on topics and issues common to many in-house counsel across industries. The event was very well attended, with more than 45 in-house lawyers participating.

On Dec. 14 the committee hosted another luncheon lecture, along with the section's Trademark Committee, chaired by Brad Groff. The program, titled "Due-Diligence in Corporate Transactions Involving Trademarks" was held at the Bar Center and was attended by more than 50 attorneys.

Joan L. Dillon of Joan Dillon Law, LLC moderated the panel, which consisted of the following attorneys: Michael Bishop, chief intellectual property counsel, BellSouth Corporation; Alex Douglas, chief counsel for corporate transactions, ING Americas; Tiffany W. Easton, corporate counsel, Oxford Industries, Inc.; and Nancy K. Gardner, Needle & Rosenberg, P.C.

Those interested in joining the In-House Committee should send an e-mail to clifford.s.stanford@atl.frb.org. •

Intellectual Property Law Section Executive Committee

Back row: Todd McClelland, Brad Groff, Griff Griffin, Doug Isenberg, Wab Kadaba and Alex Fonoroff.

Front row: Alison Danaceau, Steve Wigmore, Philip Burrus and Shane Nichols

Not pictured: Andrew Crain, Tina McKeon, Cliff Stanford and Hunter Yancy

Douglas M. Isenberg, Chair
disenberg@gigalawfirm.com
The GigaLaw Firm
5 Concourse Parkway, Suite 3000
Atlanta, GA 30328
404.256.0610

Griff Griffin, Chair Elect
ggriffin@sablaw.com
Sutherland Asbill & Brennan LLP
999 Peachtree Street, Suite 2300
Atlanta, GA 30309-3996
404.856.8233

Todd S. McClelland, Vice Chair
tmcclelland@alston.com
Alston & Bird LLP
One Atlanta Center
1201 West Peachtree Street
Atlanta, GA 30309
404.881.4789

Wab Kadaba, Secretary
wkadaba@kilpatrickstockton.com
Kilpatrick Stockton LLP
1100 Peachtree Street, Suite 2800
Atlanta, GA 30309-4530
404.815.6500

N. Andrew Crain, Treasurer
andrew.crain@tkhr.com
Thomas, Kayden,Horstemeyer & Risley, LLP
100 Galleria Parkway, Suite 1750
Atlanta, GA 30339
770.933.9500

J. Hunt Yancey Jr., Newsletter
hunter.yancey@troutmansanders.com
Troutman Sanders LLP
600 Peachtree Street, Suite 5200
Atlanta, GA 30308
404.885.3696

Alison P. Danaceau, Newsletter
adanaceau@carltonfields.com
Carlton Fields PA
1201 W. Peachtree Street, Suite 2500
Atlanta, GA 30309
404.815.3382

Steve Wigmore, Licensing Committee
swigmore@kslaw.com
King & Spalding LLP
191 Peachtree Street, N.E.
Atlanta, GA 30303-1769
404.572.2884

A. Shane Nichols, Social Committee
snichols@kslaw.com
King & Spalding LLP
191 Peachtree Street, N.E.
Atlanta, GA 30303-1763
404.572.3507

Brad Groff, Trademark Committee
bgroff@gardnergroff.com
Gardner Groff, P.C.
Paper Mill Village, Bldg. 23
600 village trace, suite 300
Marietta, GA 30067
770.984.2300

Alex Fonoroff, Copyright Committee
AFonoroff @kilpatrickstockton.com
Kilpatrick Stockton LLP
Suite 2800
1100 Peachtree Street
Atlanta, GA 30309
404.815.6436

Cliff Stanford, In-House Committee
clifford.s.stanford@atl.frb.org
Federal Reserve Bank of Atlanta
1000 Peachtree Street NE
Atlanta, GA 30309
404.498.8713

Tina McKeon, Litigation Committee
tmckeon@needlerosenberg.com
Needle & Rosenberg, P.C.
Suite 1000
999 Peachtree Street
Atlanta, Georgia 30309-3915
678.420.9300

Philip H. Burrus IV, Patent Committee
pburrus@burrusiplaw.com
Burrus Intellectual Property Law Group, LLC
460 Grant Street SE
Atlanta, Georgia 30312
404.797.8111