

**UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE DIRECTOR OF THE
UNITED STATES PATENT AND TRADEMARK OFFICE**

In the Matter of)	
)	
Qinghe Liu,)	Proceeding No. D2023-39
)	
Respondent)	
_____)	

FINAL ORDER

The Director of the Office of Enrollment and Discipline (“OED Director”) for the United States Patent and Trademark Office (“USPTO” or “Office”) and Ms. Qinghe “Jenny” Liu (“Respondent”), have submitted a Proposed Settlement Agreement (“Agreement”) to the Under Secretary of Commerce for Intellectual Property and Director of the United States Patent and Trademark Office (“USPTO Director”) for approval.

The Agreement, which resolves all disciplinary action by the USPTO arising from the Joint Stipulated Facts set forth below, is hereby approved. This Final Order sets forth the parties’ stipulated facts, legal conclusions, and sanctions.

Jurisdiction

1. Respondent is an attorney licensed to practice law in the State of New York (Registration No. 5460720) who is in an active and good standing status, making her authorized to practice before the USPTO in trademark and other non-patent matters. *See* 37 C.F.R. § 11.14(a).

2. At the times relevant to this Agreement, Respondent was engaged in practice before the USPTO in trademark matters and, therefore, subject to the USPTO Rules of Professional Conduct, 37 C.F.R. § 11.101 *et. seq.*

3. The USPTO Director has jurisdiction over this matter pursuant to 35 U.S.C. §§ 2(b)(2)(D) and 32 and 37 C.F.R. §§ 11.19, 11.20, 11.26, 11.32, and 11.39.

Background

A. Relevant USPTO Trademark Rules of Practice and Trademark Regulations

The U.S. Counsel Rule

4. Effective August 3, 2019, any foreign-domiciled trademark applicant or registrant must be represented before the USPTO by an attorney who is licensed to practice law in the United States. *See* 37 C.F.R. § 2.11(a); *Requirement of U.S. Licensed Attorney for Foreign Trademark Applicants and Registrants*, 84 Fed. Reg. 31498 (July 2, 2019) (“the U.S. Counsel Rule”).

5. In part, the U.S. Counsel Rule was intended to (a) increase compliance with U.S. trademark law and USPTO regulations, (b) improve the accuracy of trademark submissions to the USPTO, and (c) safeguard the integrity of the U.S. trademark register. *See* 84 Fed. Reg. 31498.

37 C.F.R. § 2.193 – Signature Requirements for Trademark Documents

6. The USPTO trademark signature rules require that (a) all signatures on trademark documents be signed by a proper person, (b) trademark documents be personally signed by the signatory named on the document, and (c) a person electronically signing a document must personally enter any combination of letters, numbers, spaces, and/or punctuation marks that he or she has adopted as a signature and that combination be placed between two forward slash (“/”) symbols in the signature block on the electronic submission. *See* 37 C.F.R. §§ 2.193(a), (c), and (e); and 37 C.F.R. § 11.18(a).

7. The Trademark Manual of Examining Procedure (“TMEP”) provides additional clear and straightforward guidance to practitioners regarding the USPTO trademark electronic signature rules’ requirement that the named signatory sign the document:

All documents must be properly signed. 37 C.F.R. §§ 2.193(a)(1), 11.18(a).

The person(s) identified as the signatory must personally sign the printed form or personally enter his or her electronic signature, either directly on the TEAS form or in the emailed form. 37 C.F.R. § 2.193(a), (d).

Another person (e.g., paralegal, legal assistant, or secretary) may not sign or enter the name of a qualified U.S. attorney or other authorized signatory. Just as signing the name of another person on paper does not serve as the signature of the person whose name is written, typing the electronic signature of another person is not a valid signature by that person.

TMEP § 611.01(c) (case citations omitted) (line spacing added) (bold added).

Adverse Consequences to Applications and Issued Registrations due to Violations of USPTO Trademark Signature Rules

8. If the signature on a trademark application or other submission fails to comply with 37 C.F.R. § 2.193(a) or (e) because it was entered by someone other than the named signatory or not signed by a proper person, then the submission is improperly executed, cannot be relied upon to support registration, and normally renders the application void. *See* 84 Fed. Reg. at 31498 (stating that "[i]f signed by a person determined to be an improper person, the registration may be invalid."). *See also In re Cowan*, 18 USPQ2d 1407, 1409 (Comm'r Pats. 1990); *In re Dermahose Inc.*, 82 USPQ2d 1793 (TTAB 2007); *In re Yusha Zhang*, 2021 TTAB LEXIS 465, *10, *13 (Dir. USPTO Dec. 10, 2021). When trademark filings are impermissibly signed and filed with the USPTO, the integrity of the federal trademark registration process is adversely affected.

9. Trademark applications contain declarations that are signed under penalty of perjury, with false statements being subject to punishment under 18 U.S.C. § 1001. Signatories to declarations in trademark applications make specific representations regarding applicants' use of the mark in commerce and/or their intent to use the mark in commerce. The USPTO relies on such declarations signed under penalty of perjury in trademark applications in the course of examining

trademark applications and issuing registrations.

B. Certifications to the USPTO when Presenting Trademark or Patent Papers

10. A practitioner makes important certifications via 37 C.F.R. § 11.18 whenever presenting (*e.g.*, by signing, filing, submitting, or later advocating) any trademark or patent paper to the USPTO. Specifically, the practitioner certifies that all statements made on his or her own knowledge are true, and that all statements based on the practitioner's information and belief are believed to be true. *See* 37 C.F.R. § 11.18(b)(1). The practitioner also certifies that:

[t]o the best of the party's knowledge, information and belief, *formed after an inquiry reasonable under the circumstances* (i) the paper is not being presented for any improper purpose, such as to harass someone or to cause unnecessary delay or needless increase in the cost of any proceeding before the Office; (ii) the other legal contentions therein are warranted by existing law or by a nonfrivolous argument for the extension, modification, or reversal of existing law or the establishment of new law; (iii) the allegations and other factual contentions have evidentiary support or, if specifically so identified, are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery; and (iv) the denials of factual contentions are warranted on the evidence, or if specifically so identified, are reasonably based on a lack of information or belief.

37 C.F.R. § 11.18(b)(2) (emphasis added).

11. Accordingly, a practitioner who presents any paper to the USPTO — including patent or trademark documents — certifies that he or she has conducted an inquiry reasonable under the circumstances that supports the factual assertions set forth in the paper. *See* 37 C.F.R. § 11.18(b)(2)(iii).

12. Violations of § 11.18 may jeopardize the probative value of the filing, and any false or fraudulent statements are subject to criminal penalty under 18 U.S.C. § 1001. *See* 37 C.F.R. § 11.18(b)(1).

13. Any practitioner who violates the provisions of this section may also be subject to disciplinary action. *See* 37 C.F.R. § 11.18(d).

Joint Stipulated Facts

14. In 2008, Respondent received a Master of Laws degree (L.L.M.) from Tsinghua University in China, and, in 2009, she received an L.L.M from Stetson Law School in Florida.

15. Respondent worked for about four years as a legal assistant to a Florida attorney who practiced immigration, family, and business law—not intellectual property (“IP”) law.

16. On September 14, 2016, seven years after receiving her L.L.M. degree from Stetson Law School, Respondent was admitted to the practice of law in the State of New York (Registration No. 5460720).

17. Two days earlier, on September 12, 2016, Respondent formed a law firm in Florida named “Law Firm of Liu & Associates, P.A.,” which was later renamed “Celeblaws, P.A.” (“the Firm”).

18. The Firm opened its first office in Orlando, Florida.

19. Respondent was the sole principal at the Firm until 2018, when she added a “limited liability partner” who had no control over Firm management, provided no equity stake in the Firm, and had no risk of loss from the partnership. The limited liability partner practiced in Florida civil matters including contracts, collections, family law, and real estate, and practiced in minor criminal matters, but did not practice in trademark law and had no role in the Firm’s trademark practice.

20. Respondent focuses her legal practice on immigration law—not IP law. Prior to the time relevant to this matter, Respondent had no experience with trademark law or practice before the USPTO.

21. In 2018, Respondent opened a second office for the Firm in Ganzhou, China. The Firm entered into a lease agreement for an office in Guangzhou China in December 2018. The Firm’s China office initially focused on immigration and cross-border litigation matters but later

expanded to trademark matters.

22. Respondent and the Firm hired non-practitioner assistants for the Firm's China office who were involved in the conduct at issue here.

23. Through the Firm's non-practitioner assistants in the China office, Respondent and the Firm were introduced to China-based trademark agencies which engaged the Firm to represent China-domiciled trademark clients before the USPTO with respect to trademark filings including trademark applications based on use in commerce. These companies included the following companies:

- a. Guangdong Domee Management & Consulting ("Domee"), 广州多平管理咨询有限公司, located in Jiangxia, which is located in Baiyun District, Guangzhou Province, China;
- b. Dongguan Yamasen (Amazon) Business Consulting ("Yamasen"), 东莞亚玛森商务咨询有限公司, which is located in Shilong, Shilong Town, Dongguan City, Guangdong Province; and
- c. Jetta aka Jetstile aka Guangzhou Jetta Consulting Co., Ltd. ("Jetta"), 广州积特企业管理咨询有限公司 located at Room 241, Building 4, No. 24 Xinyi Road, Liwan District, Guangzhou City, Guangdong Province, 510010.

24. When the Firm started to receive inquiries in China for intellectual property services, it formed the Firm's Intellectual Property ("IP") team. The IP team was established in November 2019.

25. Respondent turned to two associate attorneys in the Firm's Orlando office to start the IP team. One associate attorney joined the Firm in May 2018 and had trademark experience, and the other had joined the Firm's Florida office in March 2018 and spoke Mandarin.

26. These associate attorneys were designated to perform the legal services for the IP team. One was appointed to lead the Firm's IP Team, and he led the Firm's trademark work,

including work for the Firm's foreign-domiciled clients.

27. Respondent was the sole person at the Firm with supervisory authority over these two associate attorneys. She was also the only partner-level attorney who supervised the Firm's IP work, including the trademark work at issue here.

28. During the time Respondent was the sole partner supervising the Firm's IP team, she had no experience in trademark practice before the USPTO and did not take appropriate steps to familiarize herself with the federal laws, rules, or regulations applicable to practice competently before the USPTO in trademark matters.

29. Respondent was also the only partner supervising the non-practitioner assistants working on trademark matters.

30. Respondent met with the two associate attorneys designated to trademark work to discuss the Firm's trademark practice, and Respondent decided that the Firm could represent China-domiciled trademark applicants before the USPTO.

31. Respondent and the Firm started receiving referrals from the China-based trademark agencies Domee and Jeta around November 2019 and from Yamasen sometime later.

32. Neither Respondent, the two associate attorneys designated to trademark work, or anyone else at the Firm communicated with the China-domiciled trademark clients. Respondent and others at the Firm spoke only with the referring China-based trademark agencies.

33. Respondent negotiated per-case compensation rates with the China-based trademark agencies between \$80 to \$200 per trademark application.

34. In total, Respondent and the Firm received approximately \$350,000 for the trademark work from the China-based trademark agencies.

35. The Firm was compensated by the China-based trademark agencies, not by the China-domiciled trademark applicant clients.

36. The Firm performed legal services for at least 3,798 U.S. trademark applications on behalf of foreign filers in which the named signatory did not personally sign the applications.

37. One of the associate attorneys was named as attorney of record in over 3,000 trademark applications naming Chinese-domiciled applicants who were referred through the China-based trademark agencies.

38. Respondent, herself, was named the attorney of record for 1,126 trademark applications at the time they were filed.

39. The two associate attorneys created a written Firm procedure for representing trademark applicants before the USPTO. Respondent was informed about and approved the Firm's trademark procedure.

40. The Firm's trademark procedure included steps for entering U.S. attorney signatures on USPTO trademark applications. Under the procedure, non-practitioner assistants were authorized to enter the signatures, and the Firm established a practice of having non-practitioner assistants do so.

41. Neither Respondent nor her subordinates were aware of the existence of the TMEP or the USPTO trademark signature rules, and their familiarity with the U.S. Counsel Rule was solely through the China-based trademark agencies that solicited the Firm for trademark work.

42. Under the Firm's procedure and practice, non-practitioner assistants would communicate with the China-based trademark agencies, not the actual clients, about the trademark filings, including all the substantive information for the trademark applications.

43. The Firm, including non-practitioner assistants, would send “information sheets” to the China-based trademark agencies to collect important information to be used in the trademark applications.

44. The China-based trademark agencies would provide completed information sheets to the Firm’s non-practitioner assistants, which the Firm used to prepare trademark applications.

45. The China-based trademark agencies would also provide a draft electronic trademark application form (known as an “OBJ file”) to the Firm’s non-practitioner assistants in the China office. The electronic forms were in the electronic format (.obj) used by the USPTO for electronic trademark applications. The electronic forms were used by the Firm to file online trademark applications with USPTO.

46. The Firm’s non-practitioner assistants in the China office reviewed the completed electronic forms received from the China-based trademark agencies. If they had questions, they would ask the associate attorney who spoke Mandarin, who would either answer the questions or consult with the other associate attorney designated to trademark work.

47. The Firm’s attorneys were not always consulted for the review of the electronic application forms provided by the China-based trademark agencies. If the Firm’s non-practitioner assistants determined the information was sufficient, they normally would not provide the electronic application forms to an attorney for review and they would proceed independently with filing. In other words, if the Firm’s non-practitioner assistants had no questions, the Firm’s practitioners were not typically involved in the preparation or review of the trademark applications filed with the USPTO.

48. The non-practitioner assistants filed the electronic trademark application using the

completed application form received from the China-based trademark agencies and would enter into the completed application the signature of one of the associate attorneys designated to trademark work, the one who joined the firm in May 2018, which included a declaration signed under criminal penalty pursuant to 18 U.S.C. § 1001. The non-practitioner assistants' entering of this attorney's signatures violated the USPTO trademark signature rules and actually or potentially harmed the trademark applicants' intellectual property rights.

49. Respondent was aware that non-practitioner assistants were signing trademark applications with this associate attorney's name during the time the improper signatures were being made.

50. Respondent attempted to justify the Firm's practice of having a non-practitioner assistant enter the associate attorney's signature on trademark documents by stating that doing so "saved time and costs less." There was no justification for Respondent or the Firm to forgo the E-SIGN ON or H-SIGN signature methods, which would comply with the USPTO trademark signature rules, avoid harm to the clients' intellectual property rights, and prevent conduct that adversely affects the federal trademark examination and registration process. Instead, Respondent's conduct resulted in thousands of USPTO trademark applications that may ultimately be compromised for failure to comply with USPTO trademark signature rules and which, until that time, may prevent registration of legitimate marks.

51. Respondent never reviewed the applications filed under this associate attorney's signature, or any other applications signed by non-practitioner assistants. Nor did any other practitioner review the applications, not even the associate attorney whose signature was being entered.

52. This associate attorney did not have specific knowledge about the applications being filed under this associate attorney's signature.

53. Respondent therefore allowed the Firm's non-practitioner assistants to prepare trademark applications, to sign the applications with this associate attorney's name without the associate attorney's knowledge, review, or approval, and to file the applications with the USPTO without any attorney review.

54. By failing to review draft applications before they were filed or have other practitioners review the applications, Respondent assisted her non-practitioner assistants in the unauthorized practice of law before the USPTO in trademark matters.

55. The associate attorney whose signature was being entered resigned from the Firm on May 7, 2021. Accordingly, after May 7, 2021, this associate attorney was not involved in any aspect of the Firm's trademark practice before the USPTO.

56. The associate attorney notified Respondent by email about this associate's resignation.

57. Respondent represents that she did not see this resignation email until a month after the resignation, in June 2021.

58. At the time of this associate attorney's departure from the Firm, Respondent was physically located in, and working from, the Firm's China office.

59. Despite her physical presence in China, Respondent did not notify the Firm's China team, including the non-practitioner assistants working on trademark matters, about the departed attorney's resignation and departure until December 2021.

60. Despite the resignation and departure of this attorney, who was named as attorney

of record on many trademark applications filed by the Firm, the Firm's trademark procedures continued as before, including the practice of non-practitioner assistants in China using the departed attorney's credentials and entering the departed attorney's signature on trademark filings.

61. Respondent knew that the non-practitioner assistants continued to use the departed attorney's credentials and enter the departed attorney's signature after this attorney left the firm and was no longer personally involved in any aspect of the Firm's trademark practice before the USPTO.

62. Respondent did not instruct the non-practitioner assistants to stop signing the departed attorney's name. She knowingly and willingly allowed non-practitioner assistants to continue using the departed attorney's credentials and signing the departed attorney's name on trademark documents filed with the USPTO.

63. Therefore, Respondent knew that she and the Firm made false statements of fact to the USPTO with each trademark document filed with the USPTO in which the Firm's non-practitioner assistants used the departed attorney's professional credentials and entered this attorney's signature, including declarations signed under criminal penalty pursuant to 18 U.S.C. § 1001, after this attorney had departed from the Firm.

64. By directing her non-practitioner assistants to enter the departed attorney's signature in direct contravention of USPTO signature rules, both before and after this attorney's departure from the firm, and by ratifying this conduct through her inaction, Respondent failed to adequately and competently supervise the non-practitioner assistants.

65. Respondent compounded the harm to clients, the USPTO, and the trademark system through her failure to intervene promptly after this attorney left the Firm in May 2021 and to direct

non-practitioner assistants to comply with the USPTO trademark signature rules.

66. In September 2021, the other attorney designated to trademark matters, the associate who had joined the firm in March 2018, also left the Firm.

67. After the departure of the two Firm attorneys designated to trademark matters, Respondent was the only U.S. licensed attorney involved in the Firm's trademark practice.

68. During the time Respondent was the only attorney involved in the Firm's trademark practice, she had little, if any, experience in trademark practice before the USPTO and did not take appropriate steps to familiarize herself with such practice and become competent with representing clients before the Office in trademark matters.

69. Respondent learned that the Office of Enrollment and Discipline ("OED") was investigating her trademark practice when an OED staff attorney sent her a request for information in November 2022. Among other things, the request for information identified the USPTO trademark signature rules and informed Respondent of: (a) a trademark practitioner's ethical obligation to inform the USPTO of known misrepresentations of fact under 37 C.F.R. § 11.303 and (b) a trademark practitioner's ethical obligation to keep clients informed as to the status of their important trademark matters entrusted to the practitioner under 37 C.F.R. § 11.104.

70. Respondent did not inform the USPTO about the improperly signed trademark applications filed by the Firm until March 2023, when Respondent's counsel sent the Deputy Commissioner of Trademark Examination Policy a letter identifying nearly 3,800 improperly signed applications.

71. Respondent did not notify her clients about the improper signatures on their trademark applications, and the actual or potential adverse effects to their intellectual property

rights, either directly or through the referring China-based trademark agencies, until April 2023.

Additional Considerations

72. Respondent has not been the subject of professional discipline by the USPTO, and represents that she has not been the subject of professional discipline by any court, or any state bar.

73. Respondent cooperated with OED's investigation, including accepting an invitation to participate in an interview during the OED Director investigation of Respondent's conduct.

74. Respondent has acknowledged the wrongfulness of her misconduct and expressed remorse.

Joint Legal Conclusions

75. Respondent acknowledges that, based on the information contained in the Joint Stipulated Facts, above, Respondent's acts and omissions violated the following provisions of the USPTO Rules of Professional Conduct:

- a. 37 C.F.R. § 11.101 by failing to provide competent representation to clients, which requires the legal, scientific, and technical knowledge, skill, thoroughness and preparation reasonably necessary for the representation, by, among other things, not adequately researching or understanding the USPTO trademark signature rules, which resulted in violations of those rules in trademark filings made on behalf of Respondent's clients, including directing or otherwise allowing non-practitioner assistants to enter the signature of her subordinate practitioner, the associate attorney who joined the Firm's Florida office in May 2018;
- b. 37 C.F.R. § 11.103 by failing to act with reasonable diligence and promptness in representing clients by, among other things, (i) failing to notify in a timely manner non-practitioner assistants about the departure from the Firm of the associate who joined the Firm's Florida office in May 2018, and allowing such non-practitioner assistants to enter the departed attorney's name in trademark documents filed with the USPTO after this attorney had departed from the Firm, where the departed attorney was the named signatory on the document and the attorney of record for the trademark applicant; and (ii) failing to take appropriate and timely remedial action to protect the interests of her clients (e.g., failing to inform clients of actual or potential consequences of

impermissible signatures until April 2023 when prompted by OED and failing to inform the USPTO about the improper signatures);

- c. 37 C.F.R. § 11.104(a)(3) by failing to keep clients reasonably informed about the status of their matters by, among other things, failing until April 2023 to communicate with clients about, or advise them of, the adverse consequences to their intellectual property rights that may arise from improper signatures filed under Respondent's direction and supervision;
- d. 37 C.F.R. § 11.104(b) by failing to explain matters to the extent reasonably necessary to permit clients to make informed decisions regarding the representation by, among other things, failing until April 2023 to communicate with clients about, or advise them of, the adverse consequences to their intellectual property rights that may arise from improper signatures filed under Respondent's direction and supervision;
- e. 37 C.F.R. § 11.303(a)(1) by knowingly making false statements of fact or law to a tribunal or failing to correct false statements of material fact or law previously made to the tribunal by the practitioner by, among other things, knowingly authorizing, instructing, or otherwise allowing non-practitioner assistants to use the credentials and sign the name of her subordinate practitioner, the associate attorney who joined the Firm's Florida office in May 2018, on trademark documents filed with the USPTO, including declarations, both when this attorney was with the Firm and also after this attorney had left the Firm, a time when Respondent knew that the departed attorney was no longer working at the Firm and had no involvement with the documents on which this attorney's credentials and signatures were being used;
- f. 37 C.F.R. § 11.303(a)(3) by knowingly offering evidence that the practitioner knows to be false by, among other things, knowingly authorizing, instructing, or otherwise allowing non-practitioner assistants to use the credentials and sign the name of her subordinate practitioner, the associate attorney who joined the Firm's Florida office in May 2018, on trademark documents filed with the USPTO, including declarations, both when this attorney was with the Firm and also after this attorney had left the Firm, a time when Respondent knew that the departed attorney was no longer working at the Firm and had no involvement with the documents on which this attorney's credentials and signatures were being used;
- g. 37 C.F.R. § 11.303(b) by failing to take reasonable remedial measures for known fraudulent conduct related to a proceeding in which Respondent or her subordinate represented a client by, among other things, (i) failing to timely notify non-practitioner assistants about the departure from the Firm of the associate attorney who joined the Firm's Florida office in May 2018, and allowing such non-practitioner assistants to enter the departed attorney's name in trademark documents filed with the USPTO after this attorney's departure from the Firm, where the departed attorney was the named signatory on the document and the attorney of record for the trademark applicant; and (ii) failing to disclose the improper signatures to USPTO in a timely manner, having

not done so until four months after Respondent learned about OED's investigation into the improper signatures;

- h. 37 C.F.R. § 11.303(d) by failing, in an *ex parte* proceeding, to inform the tribunal of all material facts known to the practitioner that would enable the tribunal to make an informed decision, whether or not the facts are adverse by, among other things, knowingly authorizing, instructing, or otherwise allowing non-practitioner assistants to use the credentials and sign the name of her subordinate practitioner, the associate attorney who joined the Firm's Florida office in May 2018, on trademark documents filed with the USPTO, including declarations, when Respondent knew that this attorney was no longer working at the Firm and had no personal involvement with the documents on which this attorney's credentials and signatures were being used;
- i. 37 C.F.R. § 11.503(b) by, with respect to a non-practitioner assistant employed or retained by or associated with a practitioner, being responsible for conduct of such a person that would be a violation of the USPTO Rules of Professional Conduct if engaged in by a practitioner, including 37 C.F.R. §§ 11.101, 11.303(a)(1), 11.303(a)(3), 11.505, 11.804(c), and 11.804(d), by, among other things, being a partner in the law firm in which the person is employed, and having direct supervisory authority over the person, and knowing of the following conduct at a time when its consequences could have been avoided or mitigated but failing to take reasonable remedial action:
 - 1. Allowing non-practitioner assistants to sign the name of the associate attorney who joined the Firm's Florida office in May 2018 on trademark documents filed with the USPTO, on which this attorney was the named signatory and the attorney-of-record for the trademark applicant;
 - 2. Allowing a practice for handling Firm clients' trademark matters under which non-practitioner assistants prepared, signed in the names of others, and filed trademark applications that neither Respondent nor an attorney under her supervision reviewed prior to filing with the USPTO;
 - 3. Allowing improper conduct by non-practitioner assistants, including the filing of applications and other documents bearing the signature of the associate attorney who joined the Firm's Florida office in May 2018, even after this attorney had departed the Firm; and
 - 4. Failing to take any mitigating steps or reasonable remedial action until March 2023, four months after becoming aware of the thousands of violations and their possible repercussions;
- j. 37 C.F.R. § 11.503(c)(1) by, with respect to a non-practitioner assistant employed or retained by or associated with a practitioner, being responsible for conduct of such a person that would be a violation of the USPTO Rules of Professional Conduct if engaged in by a practitioner, including 37 C.F.R. §§ 11.101, 11.303(a)(1), 11.303(a)(3),

11.505, 11.804(c), and 11.804(d), by, among other things, ordering or, with the knowledge of the specific conduct, ratifying the following conduct:

1. allowing non-practitioner assistants to use the credentials and sign the name of the associate attorney who joined the Firm's Florida office in May 2018 on trademark documents filed with the USPTO, on which this attorney was the named signatory and the attorney-of-record for the trademark applicant;
 2. allowing a practice for handling Firm clients' trademark matters under which non-practitioner assistants prepared, signed in the names of others, and filed trademark applications that neither Respondent nor an attorney under her supervision reviewed prior to filing with the USPTO;
 3. allowing improper conduct by non-practitioner assistants, including the filing of applications and other documents bearing the signature of the associate attorney who joined the Firm's Florida office in May 2018, even after this attorney had departed the Firm; and
 4. failing to take any mitigating steps or reasonable remedial action until March 2023, four months after the USPTO notified her about the thousands of violations and their possible repercussions;
- k. 37 C.F.R. § 11.503(c)(2) by, with respect to a non-practitioner assistant employed or retained by or associated with a practitioner, being responsible for conduct of such a person that would be a violation of the USPTO Rules of Professional Conduct if engaged in by a practitioner, including 37 C.F.R. §§ 11.101, 11.303(a)(1), 11.303(a)(3), 11.505, 11.804(c), and 11.804(d), by, among other things, being a partner in the law firm in which the person is employed, and having direct supervisory authority over the person, and knowing of the following conduct at a time when its consequences could have been avoided or mitigated but failing to take reasonable remedial action:
1. allowing non-practitioner assistants to use the credentials and sign the name of the associate attorney who joined the Firm's Florida office in May 2018 on trademark documents filed with the USPTO, on which this attorney was the named signatory and the attorney-of-record for the trademark applicant;
 2. allowing a practice for handling Firm clients' trademark matters under which non-practitioner assistants prepared, signed in the names of others, and filed trademark applications that neither Respondent nor an attorney under her supervision reviewed prior to filing with the USPTO;
 3. allowing improper conduct by non-practitioner assistants, including the filing of applications and other documents bearing the signature of the associate attorney who joined the Firm's Florida office in May 2018, even after this attorney had departed the Firm; and

4. failing to take any mitigating steps or reasonable remedial action until March 2023, four months after becoming aware of the thousands of violations and their possible repercussions
- l. 37 C.F.R. § 11.505 by assisting others in practicing law in a jurisdiction in violation of the legal profession in that jurisdiction by, among other things, allowing a practice for handling Firm clients' trademark matters such that non-practitioner assistants prepared, signed in the names of others, and filed trademark applications that neither Respondent or another attorney reviewed prior to filing with USPTO;
- m. 37 C.F.R. § 11.804(c) by, engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation by, among other things, (i) allowing, through her acts and omissions, non-practitioner assistants under her supervision and authority to improperly sign trademark applications and file them with USPTO with the appearance that the named signatories signed the documents when, in fact, they did not and (ii) allowing, through her acts and omissions, non-practitioner assistants under her supervision and authority to prepare and file trademark applications with the USPTO bearing the attorney credentials and signatures of the associate attorney who joined the Firm's Florida office in May 2018, including when this attorney was no longer associated with the Firm and had no personal involvement with the filings; and
- n. 37 C.F.R. § 11.804(d) by engaging in conduct prejudicial to the administration of justice, by, among other things, engaging in acts and omissions that adversely affect the integrity of federal trademark examination and registration process, leading to thousands of USPTO trademark applications that may ultimately be compromised for failure to comply with USPTO trademark signature rules and which, until that time, may prevent registration of legitimate marks by (i) allowing, through her acts and omissions, non-practitioner assistants under her supervision and authority to improperly sign trademark applications and file them with USPTO with the appearance that the named signatories signed the documents when, in fact, they did not; (ii) allowing, through her acts and omissions, non-practitioner assistants under her supervision and authority to prepare and file trademark applications with the USPTO bearing the attorney credentials of the associate attorney who joined the Firm's Florida office in May 2018, with the appearance that a U.S. licensed attorney had adequately reviewed them prior to filing when, in fact, none had; (iii) allowing factual assertions to be made in support of the trademark applications without conducting an inquiry reasonable under the circumstances; and (iv) not otherwise complying with obligations under § 11.18 to conduct an inquiry reasonable under the circumstances in support of the factual assertions in trademark applications presented by non-practitioner assistants under her supervision and authority, in violation of 37 C.F.R. § 11.804(d) of the USPTO Rules of Professional Conduct.

Agreed-Upon Sanction

76. Respondent freely and voluntarily agrees, and it is hereby ORDERED, that:

a. Respondent is suspended from practice before the Office for a period of eight (8) months commencing on the date of this Final Order;

b. Respondent shall remain suspended from practice before the USPTO until the OED Director grants a petition requesting Respondent's reinstatement to practice before the USPTO pursuant to 37 C.F.R. § 11.60;

c. Respondent shall comply with 37 C.F.R. § 11.58;

d. Respondent may satisfy her obligations under 37 C.F.R. § 11.58(c)(3)(i) for those clients who are domiciled in a foreign country and have immediate or prospective business before the Office in patent, trademark, or other non-patent matters (*e.g.*, trademark applicants, parties before the USPTO Trademark Trial and Appeal Board, patent applicants, parties before the USPTO Patent Trial and Appeal Board) by emailing, in the client's native language, the requisite 37 C.F.R. § 11.58 notices and information (including a copy of the Final Order that has been correctly translated into the client's native language) to:

1. the email address for each client and, if applicable, the email address as set forth in the "Applicant's Information" portion of each client's trademark application, but only if such email address is an email address belonging to the client and one that Respondent reasonably believes to which the client has direct access (*i.e.*, not an email address belonging to a trademark agency or other referring entity);
2. an email address belonging to the client and one that Respondent reasonably believes to which the client has direct access (*i.e.*, not the email address

belonging to a foreign-domiciled third person or a foreign domiciled entity who referred the matter to Respondent); or

3. the foreign-domiciled third person or a foreign-domiciled entity who referred the matter to Respondent, but only if:

(A) Respondent takes reasonable measures to ensure that the foreign-domiciled third person or a foreign-domiciled entity thereafter promptly forwards Respondent's email to the client with the translated Final Order attached and Respondent is copied on the forwarded email;

(B) Respondent takes reasonable measures to learn from the foreign-domiciled third person or a foreign-domiciled entity that the client actually received the Respondent's email and translated Final Order forwarded to the client;

(C) Respondent's affidavit submitted pursuant to 37 C.F.R. § 11.58(d) sets forth the details of her reasonable measures that are required by subparagraphs (3)(A) and (B) immediately above; and

(D) any application for registration filed by or on behalf of Respondent sets forth the details of her reasonable measures that are required by subparagraphs (3)(A) and (B) immediately above;

e. Respondent shall not apply for a USPTO verified Electronic System account, shall not obtain a USPTO verified Electronic System account, nor shall she have her name added to a USPTO verified Electronic System account, unless and until she is reinstated to practice before the USPTO;

f. Respondent shall be prohibited from using, accessing, or assisting others in using or accessing any USPTO.gov account(s) or other USPTO filing systems for preparing or filing documents with the USPTO unless and until she is reinstated to practice before the USPTO;

g. Until there is a decision by the OED Director granting a petition requesting Respondent's reinstatement pursuant to 37 C.F.R. § 11.60, Respondent shall be prohibited, and the USPTO is authorized to disallow Respondent, from: (1) opening or activating any USPTO.gov account(s) to be used for preparing or filing documents with the USPTO; (2) applying for, or attempting to apply for any USPTO.gov account(s) to be used for preparing or filing documents with the USPTO; (3) verifying, or attempting to verify, any other person's credentials in connection with USPTO.gov account(s) to be used for preparing or filing documents with the USPTO; and (4) sponsoring or attempting to sponsor USPTO.gov account(s) to be used for preparing or filing documents with the USPTO;

h. Nothing herein shall obligate the USPTO to take action, *sua sponte*, to re-activate any USPTO.gov account disabled or suspended pursuant to this order; rather, it is Respondent's sole responsibility to initiate any such re-activation of any such USPTO.gov account;

i. Respondent shall serve a probationary period that commences on the date the Final Order is signed and terminates twelve (12) months after a decision by the OED Director granting a petition requesting Respondent's reinstatement pursuant to 37 C.F.R. § 11.60;

j. (1) If the OED Director is of the good faith opinion that Respondent, during Respondent's probationary period, failed to comply with any provision of this Agreement, the Final Order (including compliance with 37 C.F.R. § 11.58), or any provision of the USPTO Rules of Professional Conduct, the OED Director shall:

(A) issue to Respondent an Order to Show Cause why the USPTO Director should not enter an order immediately suspending the Respondent for up to an additional six (6) months for the violations set forth in the Joint Legal Conclusions, above;

(B) send the Order to Show Cause to Respondent at the last address of record Respondent furnished to the OED Director;

(C) grant Respondent fifteen (15) days to respond to the Order to Show Cause; and

(2) In the event that after the 15-day period for response and consideration of the response, if any, received from Respondent, the OED Director continues to be of the opinion that Respondent, during Respondent's probationary period, failed to comply with the USPTO Rules of Professional Conduct, the OED Director shall:

(A) deliver to the USPTO Director: (i) the Order to Show Cause; (ii) Respondent's response to the Order to Show Cause, if any; and (iii) argument and evidence supporting the OED Director's position; and

(B) request that the USPTO Director enter an order immediately suspending Respondent for up to an additional six (6) months for the violations set forth in the Joint Legal Conclusions above;

k. Nothing herein shall prevent the OED Director from seeking discrete discipline for any misconduct that formed the basis for an Order to Show Cause issued pursuant to the preceding subparagraph;

l. In the event the Respondent seeks a review of any action taken pursuant to subparagraph j., above, such review shall not operate to postpone or otherwise hold in abeyance the suspension;

m. While Respondent is on probation, Respondent shall, at least on a bi-weekly basis, (i) search the USPTO's online trademark search system (currently located at <https://tmsearch.uspto.gov/search/search-information>) for applications identifying her as the attorney of record; and (ii) promptly inform in writing the USPTO Office of Trademark Examination Policy of each trademark document filing identifying her as the attorney of record that was made without her knowledge or consent;

n. While Respondent is on probation, Respondent shall, at least on a bi-monthly basis, submit a written report to the OED Director stating that she has completed the bi-weekly searches of the online trademark search system, and, as applicable, (i) stating that she identified no applications or other trademark filing in which she was named as the attorney of record that were not made by her or without her knowledge and consent; or (ii) providing copies of correspondence sent to the USPTO Office of Trademark Examination Policy as described in the preceding subparagraph;

o. As a condition of being reinstated to practice before the USPTO, Respondent shall provide to the OED Director a declaration, affidavit, or statement in compliance with 28 U.S.C. § 1746 signed by Respondent stating that she has successfully completed six (6) hours of continuing legal education credit on ethics/professional responsibility;

p. As a condition of being reinstated, Respondent shall provide to the OED Director a declaration, affidavit, or statement in compliance with 28 U.S.C.

§ 1746 signed by Respondent stating that she has reviewed thoroughly all provisions of the Trademark Manual of Examining Procedure, including but not limited to, the provisions of the USPTO's signature requirements;

q. As a condition of her probation, prior to the end of her probationary period, Respondent shall:

(1) enroll in and virtually attend completely each of the eight modules comprising the USPTO's Trademark Basics Boot Camp (located on the USPTO website at <https://www.uspto.gov/about-us/events/trademark-basics-boot-camp>); and

(2) provide to the OED Director a declaration, affidavit, or statement in compliance with 28 U.S.C. § 1746 signed by Respondent stating that she has done so;

r. Nothing in the Final Order shall prevent the Office from considering the record of this disciplinary proceeding, including the Final Order: (1) when addressing any further complaint or evidence of similar misconduct concerning Respondent brought to the attention of the Office; and/or (2) in any future disciplinary proceeding against Respondent (i) as an aggravating factor to be taken into consideration in determining any discipline to be imposed, and/or (ii) to rebut any statement or representation by or on Respondent's behalf; and/or (3) in connection with any request for reconsideration submitted by Respondent pursuant to 37 C.F.R. § 11.60;

s. The OED Director electronically publish the Final Order at the OED's electronic FOIA Reading Room, which is publicly accessible through the Office's website at: <https://foiadocuments.uspto.gov/oed/>;

t. The OED Director shall publish a notice in the *Official Gazette* that is materially consistent with the following:

Notice of Suspension and Probation

This notice concerns Ms. Qinghe Liu of Orlando, Florida, an attorney licensed in New York (Registration No. 5460720) who engaged in practice before the United States Patent and Trademark Office (“USPTO”) or (“Office”) in trademark matters. The USPTO Director has suspended Ms. Liu from practice before the Office for a period of eight (8) months and placed her on probation. This disciplinary sanction is based on Ms. Liu having violated the following provisions of the USPTO Rules of Professional Conduct: §§ 11.101 (lack of competence); 11.103 (lack of diligence); 11.104(a)(3) and (b) (inadequate communication with clients); 11.303(a)(1) and (a)(3) (lack of candor to the tribunal— i.e., the USPTO); 11.303(b) (failure to take remedial action for known fraud in a proceeding); 11.303(d) (failure to inform the tribunal (i.e., the USPTO) of all known material facts); 11.503(b), (c)(1), and (c)(2) (failure to adequately supervise non-practitioner assistants); 11.505 (assisting others in unauthorized practice before the USPTO); 11.804(c) (engage in conduct involving dishonesty, fraud, deceit or misrepresentation); and 11.804(d) (engaging in conduct prejudicial to the integrity of the U.S. trademark registration and U.S. patent issuance processes).

Ms. Liu is the founding partner of Celeblaws, P.A., which was previously known as the Law Firm of Liu & Associates, P.A. (the Firm). The Firm has an office in Orlando, Florida, and in Guangzhou Province, China. At the times relevant to Ms. Liu’s suspension, the Firm maintained a business relationship with numerous trademark companies in China for purposes of filling and prosecuting trademark applications with the USPTO, namely: Guangdong Domee Management & Consulting, 广州多丰管理咨询有限公司, which is located in Jiangxia, Baiyun District, Guangzhou Province, China; Dongguan Yamasen (Amazon) Business Consulting, 东莞亚玛森商务咨询有限公司, which is located in Shilong, Shilong Town, Dongguan City, Guangdong Province, China; and Guangzhou Jetta Consulting Co., Ltd., 广州积特企业管理咨询有限公司, which is located in Liwan District, Guangzhou City, Guangdong Province, China.

In connection with these business relationships, attorneys at the Firm, including Ms. Liu and an associate attorney who Ms. Liu had assigned to trademark matters, became the attorneys of record for foreign-domiciled trademark applicants in approximately 3,800 trademark applications filed with the USPTO between 2019 to 2021. Ms. Liu, herself, was designated attorney of record in over 1,000 trademark applications, and the associate attorney did not have specific knowledge about many applications being filed under the attorney’s signature. Those trademark applications were filed and prosecuted by non-practitioner assistants employed by the Firm, often with no supervision from any attorneys with the Firm.

Ms. Liu violated numerous ethics and trademark rules of practice as a result of the Firm’s trademark practice. Ms. Liu impermissibly allowed, directed, and facilitated the Firm’s non-practitioner assistants to sign attorney names, including at minimum the

name of an associate attorney who Ms. Liu assigned to trademark matters, on trademark documents that were filed with the Office, many of which contained sworn oaths on which the USPTO relied during *ex parte* proceedings to make factual and legal determinations regarding the applicants' respective intellectual property rights. As part of her misconduct, Ms. Liu knowingly allowed the Firm's non-practitioner to use the associate attorney's credentials and enter the associate attorney's signature she assigned to trademark matters after this attorney had resigned from the Firm and had no role in the Firm's trademark practice, failing even to inform the assistants that this associate attorney had left the Firm. Ms. Liu allowed this to occur, at minimum, for a period of time from May to December 2021. Beyond that, Ms. Liu failed to adequately manage the Firm's trademark practice, or to supervise the Firm's attorneys and non-practitioner assistants working on trademark matters, throughout the entire period of time that the Firm represented foreign-domiciled trademark applicants before the USPTO, applicants who had been referred to the Firm by China-based trademark companies. That period of time lasted from at least November 2019 to December 2021, when the Firm was responsible for approximately 3,800 trademark applications. Ms. Liu accordingly violated the trademark signature rules set forth in 37 C.F.R. § 2.193 and the express guidance set forth in § 611.01(c) of the Trademark Manual of Examining Procedure. Ms. Liu also violated 37 C.F.R. § 11.18 when she facilitated the presentation of trademark documents to the USPTO without any attorney conducting an inquiry reasonable under the circumstances before the documents were submitted by non-practitioner assistants.

The USPTO has published ample, readily available information for practitioners regarding what is competent practice before the Office in trademark matters. In particular, the agency maintains a webpage regarding important trademark information including specific links to relevant laws, rules, regulations, and rulemaking. (See www.uspto.gov/trademarks).

The agency publishes online and regularly updates its Trademark Manual of Examining Procedure ("TMEP") (*See* tmep.uspto.gov/RDMS/TMEP/current). The TMEP provides trademark practitioners, *inter alia*, with a reference work on the practices and procedures relative to prosecution of applications to register marks in the USPTO. The TMEP provides unambiguous information about the agency's signature requirements at TMEP § 611.01(c) (stating, in part, "All documents must be personally signed or bear an electronic signature that was personally entered by the named signatory"). 37 C.F.R. § 2.193(a)(1), (c)(1). Another person (*e.g.*, paralegal, legal assistant, secretary) may not sign or enter the name of an attorney or other authorized signatory. *See In re Dermahose Inc.*, 82 USPQ2d 1793 (TTAB 2007); *In re Cowan*, 18 USPQ2d 1407 (Comm'r Pats. 1990)." (parenthesis in original)). When trademark filings are impermissibly signed and filed with the USPTO, the integrity of the federal trademark registration process is adversely affected. Therefore, practitioners who represent applicants, registrants, or others before the USPTO in trademark matters—including those who serve as U.S. counsel for foreign-domiciled clients—are reasonably expected to know (a) the laws, rules, regulations, and procedures pertaining to their

representation of their trademark clients, and (b) the potential adverse consequences to clients' intellectual property rights in trademark applications and registrations as well as to the integrity of the U.S. trademark registration system when such laws, rules, regulations, or procedures are violated.

Practitioners are mindful that publicly available information and opinions stating or suggesting that someone other than the named signatory may sign a trademark documents are contrary to the clear and unambiguous USPTO trademark signature rules.

The USPTO has also published ample information about the U.S. Counsel Rule. *See, e.g., Requirement of U.S. Licensed Attorney for Foreign Trademark Applicants and Registrants*, 84 FR 31498 (Final Rule) (July 2, 2019); 37 C.F.R. § 2.11 (Requirement for representation); TMEP § 601. There is also ample, readily-available information for practitioners regarding what is ethical practice before the Office in trademark matters. For example, the USPTO's searchable OED FOIA webpage (found at <https://foiadocuments.uspto.gov/oed>) instantaneously lists dozens of cases when the search word "signature" is entered in the search field.

Therefore, practitioners who represent applicants, registrants, or others before the USPTO in trademark matters—including those who serve as U.S. counsel for foreign-domiciled clients—are reasonably expected to know (a) the applicable trademark prosecution and signature rules, (b) the provisions of the USPTO Rules of Professional Conduct implicated by such representation, and (c) the potential disciplinary consequences when such provisions of the USPTO Rules of Professional Conduct are violated.

The USPTO Director has issued numerous orders imposing discipline on trademark practitioners who violated the USPTO Rules of Professional Conduct based on not complying with USPTO trademark signature rules, not adequately supervising non-attorney assistants, and/or not fulfilling obligations under 37 CFR § 11.18 to conduct an inquiry reasonable under the circumstances in support of factual assertions made in trademark documents presented to the USPTO, including:

In re Swyers, Proceeding No. D2016-20 (USPTO Jan. 26, 2017)
In re Meikle, Proceeding No. D2019-17 (USPTO Mar. 21, 2019)
In re Crabtree, Proceeding Nos. D2018-31 & -47 (USPTO Apr. 25, 2019)
In re Sapp, Proceeding No. D2019-31 (USPTO May 15, 2019)
In re Sweeney, Proceeding No. D2019-33 (USPTO June 19, 2019)
In re Mar, Proceeding No. D2019-11 (USPTO Aug. 2, 2019)
In re Rajan, Proceeding No. D2019-30 (USPTO Sep. 5, 2019)
In re Caraco, Proceeding No. D2019-50 (USPTO Sep. 12, 2019)
In re Caldwell, II, Proceeding No. D2020-12 (USPTO Mar. 17, 2020)
In re Bashtanyk, Proceeding No. D2020-09 (USPTO Apr. 17, 2020)

In re Lou, Proceeding No. D2021-04 (USPTO May 12, 2021)
In re Mincov, Proceeding No. D2020-30 (USPTO Aug. 23, 2021)
In re Reddy, Proceeding No. D2021-13 (USPTO Sep. 9, 2021)
In re David, Proceeding No. D2021-08 (USPTO Sep. 24, 2021)
In re Di Li, Proceeding No. D2021-16 (USPTO Oct. 7, 2021)
In re Hom, Proceeding No. D2021-10 (USPTO Dec. 17, 2021)
In re Yang, Proceeding No. D2021-11 (USPTO Dec. 17, 2021)
In re Pasquine, Proceeding No. D2019-39 (USPTO Mar. 28, 2022)
In re Wan, Proceeding No. D2022-04 (USPTO Apr. 1, 2022)
In re Hao, Proceeding No. D2021-14 (USPTO Apr. 27, 2022)
In re Zhang, Proceeding No. D2022-16 (USPTO July 11, 2022)
In re Liu, Proceeding No. D2022-03 (USPTO Aug. 9, 2022)
In re Han, Proceeding No. D2022-23 (USPTO Jan. 6, 2023)
In re Song, Proceeding No. D2023-10 (USPTO May 1, 2023)
In re Gallagher, Proceeding No. D2023-08 (USPTO June 23, 2023)
In re Jabbour, Proceeding No. D2023-33 (USPTO Sep. 6, 2023)
In re Wang, Proceeding No. D2023-38 (USPTO Nov. 21, 2023)
In re Niu, Proceeding No. D2023-32 (USPTO Jan. 3, 2024)
In re Huang, Proceeding No. D2023-37 (USPTO Jan. 8, 2024)
In re Bethel, Proceeding No. D2019-42 (USPTO Jan. 27, 2024)
In re Koh, Proceeding No. D2024-07 (USPTO Feb. 7, 2024)
In re Che-Yang Chen, Proceeding No. D2024-01 (USPTO Mar. 20, 2024)
In re Haffner, Proceeding No. D2023-35 (USPTO May 21, 2024)
In re Oldham, Proceeding No. D2024-11 (USPTO May 29, 2024)
In re Harper, Proceeding Nos. D2020-10 and D2024-15 (USPTO Aug. 13, 2024)
In re Yu, Proceeding No. D2024-24 (USPTO Aug. 20, 2024)
In re Khalsa, Proceeding No. D2019-38 (USPTO Sep. 5, 2024)
In re Weitao Chen, Proceeding No. D2024-21 (USPTO Sep. 11, 2024)

This action is the result of a settlement agreement between Ms. Liu and the OED Director pursuant to the provisions of 35 U.S.C. §§ 2(b)(2)(D) and 32, and 37 C.F.R. §§ 11.19, 11.20, and 11.26. Disciplinary decisions involving practitioners are posted for public reading at the Office of Enrollment and Discipline Reading Room accessible at: <https://foiadocuments.uspto.gov/oed>;

u. Based on Respondent's agreement to do so, Respondent waives all rights to seek reconsideration of the Final Order under 37 C.F.R. § 11.56, waives the right to have the Final Order reviewed under 37 C.F.R. § 11.57, and waives the right otherwise to appeal or challenge the Final Order in any manner;

- v. Within a reasonable period after the entry of this Final Order approving this Agreement, the OED Director shall file a motion dismissing the pending disciplinary action without prejudice; and
- w. As a condition of being reinstated, Respondent shall comply fully with all provisions of 37 C.F.R. § 11.60.

Users,
Seifert,
Jennifer

Digitally signed
by Users, Seifert,
Jennifer
Date: 2024.11.21
16:17:38 -05'00'

Jennifer R. Seifert
Associate General Counsel for General Law
United States Patent and Trademark Office

Date

on delegated authority by
Katherine K. Vidal
Under Secretary of Commerce for Intellectual Property and
Director Of The United States Patent And Trademark Office

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing Final Order was sent, on this day, to the parties in the manner indicated below-

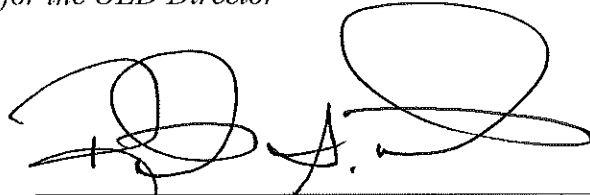
Via e-mail:

Emil Ali
emil@mccabeali.com
Counsel for Respondent

Via e-mail:

Sydney Johnson
Sydney.Johnson@uspto.gov
[REDACTED]
Counsel for the OED Director

11/22/2024
Date



United States Patent and Trademark Office
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Alexandria, VA 22313-1450