



Intellectual Property Entertainment and Sports Law Section

Alabama State Bar Association

Volume 5, Issue 1

August 2010

In This Issue

Supreme Court Upholds Patentability of Business Methods in *Bilski v. Kappos*

Should I Register My Copyright?

Human Gene Patents Claims Declared Invalid

New Alabama Trademark Statute Increases Remedies for Trademark Infringement and Provides Reasons to Register at the State Level

Memorial to Matthew Lee Huffaker

Upcoming CLE

September 23, 2010
8:00 a.m. - 1:00 p.m.
Intellectual Property Law and Entertainment Law In Alabama

Supreme Court Upholds Patentability of Business Methods in *Bilski v. Kappos*

By Mark Swanson

Whether business methods should be patentable is a hotly debated subject. Patents using method claims protect many business methods today, as well as many other inventions such as software and diagnostic testing. The U.S. Supreme Court case of *Bilski v. Kappos*, issued on June 28, 2010, reviewed patent eligibility for method claims and slightly broadened the standard adopted by the Federal Circuit. The *Bilski* decision also explicitly stated business methods are patentable.

On April 10, 1997, Bernard Bilski and Rand Warsaw applied for a patent on a method for hedging risks in commodities markets. Bilski's patent application was rejected by the U.S. Patent and Trademark Office (USPTO) Examiner as unpatentable subject matter under 35 U.S.C. § 101, and this rejection was sustained by the Board of Patent Appeals and Interferences (BPAI). The Federal Circuit affirmed the decision of the BPAI *en banc*, and declared the machine or transformation test as the ONLY test for patentable subject matter of process claims. The machine or transformation test requires the process to be either tied to a particular machine, or transform a particular article into a different state or thing. The Supreme Court affirmed the Federal Circuit, but clarified the machine or transformation test was NOT the only test for patentable subject matter.

Bilski revolves around patentable subject matter, and more particularly around patentable subject matter for process or method claims. The four statutory categories of patentable subject matter are (1) processes, (2) machines, (3) manufactures, or (4) compositions of matter. 35 U.S.C. §101. Prior Supreme Court precedent has created exceptions which are not patentable subject matter, even if within a statutory category, including (1) laws of nature, (2) physical phenomena, and (3) abstract ideas.

The patent laws attempt to strike a balance between providing an incentive for inventors, and not stifling innovation by granting unnecessary monopolies. In *Bilski*, The Supreme Court did not take a position on where to strike this balance. However, the *Bilski* decision did make a few points clear. First, the machine or transformation test is a good clue for defining patentable subject matter, but it is NOT the only test. Second, business methods are patentable. Third, the test for patentability from *State Street Bank & Trust Co v. Signature Financial Group, Inc.*, 149 F.3d 1368, (i.e., the Useful, Concrete, and Tangible Result test,) is no longer valid. Finally, abstract ideas are still not patentable subject matter.

The Supreme Court decision in *Bilski* was far from unanimous. Five justices joined in the majority opinion, but two of those justices did not join in all of the majority opinion. Four justices joined in a concurrence, and two justices joined in a separate concurrence to try and clarify what all nine justices agreed on. In minority opinions, three justices said business methods should have a higher standard for patentability, four justices said business methods were NOT patentable and there should only be one standard

(Continued on page 2)

for patentability, and three justices said patent eligibility changes and evolves with progress.

All nine justices agreed *Bilski's* application was not patentable because it was an abstract idea, and abstract ideas are not patentable. The problem is how to define an "abstract idea." The court said prior cases provided sufficient guidance, and specifically named *Gottschalk v. Benson*, 409 U.S. 63 (1972); *Parker v. Flook*, 437 U.S. 584 (1978); and *Diamond v. Diehr*, 450 U.S. 175 (1981). All three cases involve the use of a mathematical algorithm, which is considered a law of nature and an exception to patentable subject matter.

The *Benson* case involved a patent application claiming an algorithm to convert binary-coded decimal numerals into pure binary code. The algorithm had no other use than as claimed, and one cannot wholly pre-empt the use of a formula or algorithm with a patent.

In *Flook*, the patent application claimed a process using an algorithm for calculating and updating an alarm limit from monitored conditions during catalytic conversion in the petrochemical industry. The claim included no limitations specifying (a) how to select safety margins, (b) how to select weighting factors, (c) the chemical processes at work, (d) how to monitor process variables, (e) how to adjust the alarm limit, or (f) how to set off an alarm. Additionally, if the algorithm was assumed to be prior art, the application contained no patentable invention. Despite the fact the claim was limited to the petrochemical industry, the court said post-solution activity cannot transform an unpatentable principle into a patentable process.

In *Diehr*, a method for curing synthetic rubber products using temperature readings and an algorithm to calculate cure completion was claimed. The claim included the specific steps of (a) installing rubber in a press, (b) closing the mold, (c) constantly determining the mold temperature, (d) constantly calculating the cure time, and (e) opening the press at the proper time. Because this application would not pre-empt the use of the algorithm in general, and would only foreclose others from a particular application that used the algorithm, it was not an abstract idea and was patentable subject matter.

A patent prosecutor should consider several techniques in light of the *Bilski* decision. First, if possible, a patent application should include claims to a specific article, instead of just method claims. For example, Beauregard claims can be used for computer programs, where one claims "computer readable media programmed to ..." A Beauregard claim is based on the tangible computer

readable media, as opposed to the method of the computer program. The term "computer readable media" can include transitory signals, which are not tangible objects, so the USPTO recommends adding the word "non-transitory" in front of "computer readable media" to clarify the media is a tangible object.

Second, method claims should be directed to a particular machine or the transformation of a particular article into a different state or thing. The USPTO issued a guidance memo after *Bilski v. Kappos* instructing Examiners to use the machine or transformation test, and to also consider if an application was directed to an abstract idea. The difficulty of determining if an application is directed to an abstract idea makes it likely that Examiners will primarily rely on the machine or transformation test to determine patent eligibility.

Finally, if method claims must be used that do not meet the machine or transformation test, the claims should be limited to a particular process. A comparison of the *Flook* and *Diehr* cases indicate claims have a better chance of being patentable subject matter if they are not too broad.

As technology advances, many of the traditional lines for patentability have become blurred. Many hoped *Bilski* would more clearly define patentable subject matter, but that remains for future cases. For now, we know the machine or transformation test is a good clue to patentability, and business method patents are not banned. ❖

Mark Swanson is an associate in the Intellectual Property Practice Group of Bradley Arant Boult Cummings, LLP. As a registered patent attorney, he has drafted and prosecuted patents to protect many different types of inventions, including polymers, heat transfer devices, and mechanical devices. He may be reached at mwsanson@babbc.com or (256) 517-5125. His full bio may be found at <http://www.babbc.com/mark-david-swanson/>.

Should I Register My Copyright?

By David Carn

One of the most fundamental questions in the realm of copyright is, "Should I register my work?" The answer is that you should, but you do not have to—for the most part.

Registration with the U.S. Copyright Office is recommended but not required in order to claim a copyright in a work. Federal copyright protection exists at the point of *creation*, which is the point at which the original work is fixed in a tangible medium of expression.¹ Some typical methods of fixation are writing, painting, recording and filming. Once a work has been sufficiently fixed, then federal copyright protection can be claimed.

Copyright registration with the U.S. Copyright Office carries with it certain rights and benefits. Two of the more substantial benefits of copyright registration are the availability of statutory damages and attorney fees in court.²

It is often difficult to prove damages in a copyright infringement dispute. Therefore statutory damages are a huge advantage to a plaintiff in a copyright dispute. However, the availability of statutory damages, and attorney fees, is limited. The copyright owner must register the work with the Copyright Office either before the alleged infringement occurs, or within three months after the date of first publication (typically, this means distributing the work to the public for sale or further distribution).³ If the copyright owner waits too long, then the availability of statutory damages and attorney fees goes away.

Another benefit of copyright registration is that it helps prove ownership. In the event of a dispute, registrants have *prima facie* evidence of copyright ownership because the work is registered with the Copyright Office, assuming the work is registered within five years of the date of first publication.⁴

Poor Man's Copyright

Contrary to formerly popular belief, a *poor man's copyright* is not the same as registration. A poor man's copyright is the idea that instead of paying to have works registered with the Copyright Office, a person could mail the work in a self-addressed envelope and leave the envelope sealed. This way if the issue of ownership comes into question, the date stamp from the post office would be proof of the date of creation.

It is true that a self-addressed envelope, or other similar method, could potentially be used in a court of law as evidence of ownership. But it would not be very good evidence. A poor man's copyright can easily be faked. For example, a person could mail an unsealed envelope and then seal it at any point in the future. Electronic evidence such as e-mails can also be faked relatively easily these days.

Regardless of whether such methods are used, registration with the Copyright Office is the only way to receive the benefits conferred upon a registrant by law. Without registering, the claimant cannot seek statutory damages and attorney fees, or other advantages available to a registrant. Also, registration is required before filing suit for federal copyright protection.⁵ If a person wants to use a date-stamped envelope in federal court, that person must first register with the Copyright Office before the case will be heard. Despite its name, a poor man's copyright and other similar methods of documenting ownership are not the equivalent of registration with the U.S. Copyright Office.

Group Registration

Another question that is often asked is, "Can I register more than one work in the same registration?" The answer is yes, however you may limit your options at law.

The biggest issue is statutory remedies. Pursuant to statute, courts can reward statutory damages of up to \$30,000 for any infringement, or up to \$150,000 for willful infringement of "any one work."⁶ The issue then becomes whether each work within a single registration can be considered "any one work" for the purposes of multiple statutory damages.

Courts have developed different approaches when applying this language. Some courts ask whether each work has a "separate economic and copyright" life.⁷ Other courts apply a factor test to determine whether each work is a "singular and copyrightable effort."⁸ At least one court has held that works that were registered together, and that were generally of the same subject matter (in this case, the works were photographs from the same photo shoot), cannot be separated for the purposes of individual awards of statutory damages.⁹

1 See 17 U.S.C. § 102.

2 17 U.S.C. § 504(c). Statutory damages and attorney fees are available if the work is registered within three months of publication (again, typically the distribution for sale to the public) or one month after learning of a claimed infringement. 17 U.S.C. § 412.

3 17 U.S.C. § 412. For the definition of *publication*, see 17 U.S.C. § 101.

4 17 U.S.C. § 410(c).

5 17 U.S.C. § 411.

6 17 U.S.C. § 504(c)(1).

7 *Walt Disney Co. v. Powell*, 897 F. 2d 565, 569 (D.C. Cir. 1990).

8 *Playboy Enters., Inc. v. Sanfilippo*, 1998 WL 207856 (C.D. Cal. Mar. 25, 1998).

9 *Coogan v. Avnet, Inc.*, 2005 WL 2789311 (D. Ariz. Oct. 24, 2005).

By registering works separately a claimant is assured a better chance at multiple statutory damages.

Everyone Is a Claimant

In sum, registering a work with the U.S. Copyright Office is not required to be able to enjoy federal copyright protection, but it does carry with it certain benefits. Chief among these are the availability of statutory damages and attorney fees. On the other hand, copyright registration does not guarantee that the registrant is the true copyright owner. The only advantage a copyright registrant has over an unregistered copyright claimant is that the registrant has all of the benefits of registration provided by federal statute. Until otherwise proven by a court of law, everyone is a *claimant*. ❖

David Carn is an associate with Baker Donelson Bearman Caldwell & Berkowitz, PC. David devotes much of his time to advising clients in the music industry, including artists, songwriters, music festivals, music promoters, and radio stations. He may be reached at dcarn@bakerdonelson.com or (205) 244-3834. His full bio may be found at <http://www.bakerdonelson.com/david-a-carn/>.

Human Gene Patents Claims Declared Invalid

By Patricia Clotfelter

The District Court for the Southern District of New York, on April 4, 2010, issued a very controversial opinion invalidating fifteen claims in seven patents relating to the human BRCA1 and BRCA2 genes (Breast Cancer Susceptibility Genes 1 and 2). These claims related to certain types of diagnostic testing for breast cancer. Ruling on cross summary judgment motions in *Association for Molecular Pathology, et al. v. United States Patent and Trademark Office, et al.*, No. 09-CIV-4515 (S.D.N.Y., April 4, 2010), the Court stated the issue as follows: "Are isolated human genes and the comparison of their sequences patentable?" It concluded that they are not.

The defendant United States Patent and Trademark Office ("USPTO") issued the patents-in-suit, which are held by various of the defendant parties. The resolution of the issues presented by the plaintiffs' challenge were acknowledged by the Court to affect not only breast cancer patients and medical professionals, but also

numerous advocacy groups and, certainly, the patent holders and their investors.

The USPTO had previously granted other patents on DNA sequences that were claimed in the form of "isolated DNA," reasoning that DNA should be treated the same as any other chemical compound, and that its purification from the body, using well-known techniques, transformed it into something distinctly different in character and therefore patentable. Critics of this reasoning, like the plaintiffs in the *Molecular Pathology* case, considered this merely a baseless argument to get around the prohibitions on direct patenting of DNA in the body.

The Court explained its ruling as follows:

The resolution of these motions is based upon long recognized principles of molecular biology and genetics: DNA represents the physical embodiment of biological information, distinct in its essential characteristics from any other chemical found in nature. It is concluded that DNA's existence in an "isolated" form alters neither this fundamental quality of DNA as it exists in the body nor the information it encodes. Therefore, the patents at issue directed to "isolated DNA" containing sequences found in nature unsustainable as a matter of law and are deemed unpatentable subject matter under 35 U.S.C. §101."

Association for Molecular Pathology, No. 09-CIV-4515 at p. 4.

The Court also found that the method claims at issue, which involved the analysis of the "isolated DNA," were invalid, reasoning that the terms "analyzing" and "comparing" used in the claims established that they were directed only to the abstract mental process of analyzing and comparing the gene sequences. The Court rejected one defendant's claim that the challenged methods were directed to comparing DNA molecules rather than gene sequences. Considering additional similar arguments regarding the claimed methods, the Court found that they failed the "machine or transformation test" under 35 U.S.C. §101 for patentable subject matter.

Because the invalidation of the challenged patents claims provided plaintiffs with the relief they sought, the constitutional claims against the USPTO were dismissed under the doctrine of constitutional avoidance.

The 152 page Amended Opinion contains a detailed and reasoned analysis of all the competing arguments of the parties, the history of the patents' development, the

areas of molecular biology involved, how the law on gene patenting has developed, and how it applies to this very difficult and divisive issue. An appeal seems inevitable, given the huge ethical, public policy and financial issues involved. ❖

Patricia Clotfelter is a Shareholder in the Birmingham office of Baker, Donelson, Bearman, Caldwell & Berkowitz, P.C. She concentrates her practice in the area of commercial litigation with an emphasis on intellectual property. Her experience includes representation of numerous clients in trademark, copyright, trade secret and patent infringement disputes in fields as diverse as computer software development, data mining, industrial coatings, banking, advertising, big game hunting and restaurant operation. You may contact Pat Clotfelter at pclotfelter@bakerdonelson.com or (205) 250- 8315. Her full bio may be found at <http://www.bakerdonelson.com/patricia-clotfelter/>

New Alabama Trademark Statute Increases Remedies for Trademark Infringement and Provides Reasons to Register at the State Level

By Linda Friedman

State trademark laws have increasingly been ignored by trademark owners and trademark attorneys, who typically prefer to register valuable marks in the United States Patent and Trademark Office and to assert infringement claims under the federal Lanham Act, in federal court. However, state trademark laws can provide important protection to supplement or, in some cases, in lieu of, federal protection.

Alabama's recently enacted trademark statute, to take effect January 1, 2011, revamps the existing state registration procedure and adds enforcement weapons, previously unavailable under Alabama law, to the trademark owner's arsenal. New remedies under the revised law will include attorney fees, injunctive relief, and damages, according to provisions that closely follow the remedies under the federal Lanham Act. The revised statute also follows the federal registration system by adopting the United States Trademark Office's classification scheme for goods and services associated

with a registrant's trademark, and discards the state's now outdated classification scheme.

While Alabama's statute will be more in line with the federal statute as of January 1, 2011, it is not a mere duplication of the federal trademark statute. Despite the similarity of the Alabama and federal statutes, the state statute offers some advantages over the federal statute and a trademark owner would be well advised to consider registering its trademarks in Alabama. Reasons to register in Alabama include:

- *Alabama's existing statute, as well as the revised statute, provide for registration of trade names, in addition to trademarks and service marks.* In contrast, federal registration is available only for trademarks (terms, designs or other marks used to identify the source of goods) and service marks (marks used to identify the source of services). While a business' name (its actual legal name, a fictional name, or a name under which it operates and does business) can be as valuable to it as the names it uses for its goods and services. While trade names can be protected under common law principles and thus do not depend on statutory protection, the registration of a trade name puts others on public notice of the trade name rights, and may prevent others from adopting a similar name for their business. In contrast, the mere reservation of a corporate name with the Secretary of State, or qualification to do business as a foreign corporation, or filing of incorporation or other organizational papers with the Secretary of State, does not confer trademark rights or remedies. Moreover, the remedies available under the Alabama statute go beyond remedies otherwise available under common law for trade name infringement.
- *Registration under the Alabama statute (and under the any other state statute) is much less expensive, and much faster, than registration with the United States Trademark Office.* If a business is using its mark only in a limited area and has limited resources, it may wish to avoid the more costly federal registration procedure, although it should always clear its new trade name or trademark by checking federal registrations and other sources for preexisting rights of others.
- *Federal registration may not be available to a trademark owner that uses its mark only in one state.* The federal statute requires that the mark be used "in commerce" before the United States Trademark Office can issue a registration. A trademark is used "in commerce" when the goods associated with the mark are sold or transported in commerce that Congress has the right

to regulate; this typically means that the goods must be shipped across state lines. A service mark is used "in commerce" when the mark is used or displayed in the sale or advertising of services and the services are rendered in interstate commerce, or the services are rendered in more than one state or in the United States and a foreign country and the person rendering the services is engaged in commerce in connection with the services. A trademark or service mark used by a purely local business, therefore, may be ineligible for a federal registration.

- *The Alabama statute's damages remedy is available only if the mark is registered in Alabama.* While the federal statute provides a similar damages remedy, and that remedy is not limited to registered marks, the federal remedies may not be available if the trademark owner lacks a federal registration and the infringement is purely local, and not "in commerce" regulated by Congress. Also, the trademark owner may want to seek damages under both the state and federal statutes or may want to confine its claims to the state statute.
- *The Alabama Secretary of State will be required to notify registrants of the renewal deadlines within the year prior to the renewal deadline.* While this renewal notification is not itself a reason to register, it does furnish a safeguard against inadvertent expiration which the federal statute does not provide.

The revised statute also redefines the concept of trademark "dilution" and provides a cause of action for dilution of famous marks that might not be protected by the federal statute. The federal statute's dilution cause of action is limited to famous marks that are "diluted" by another's use of the same or a substantially similar mark "in commerce." The federal statute, like the state statute, does not require that the famous mark be registered, though lack of registration may weaken the claim that a mark is famous. The federal statute, like the state statute, provides a cause of action even when the defendant's mark does not cause confusion, is not likely to cause confusion, and when the defendant is not in competition with the owner of the famous mark. However, for a mark to qualify for protection under the federal dilution statute, the mark must be widely recognized by the *general consuming public of the United States* as a designation associated with the owner's goods or services. Thus, fame in one state alone, or recognition by less than the "general consuming public" of the U.S., is insufficient to invoke the federal dilution statute. By contrast, the Alabama dilution statute will protect a mark that is famous by virtue of being widely recognized by

the *general consuming public of Alabama or a significant geographic area in the state.* Thus, a mark that is famous within Alabama, but not nationally, will be able to secure an injunction, and potentially other remedies, against the use of a similar mark in Alabama, provided the mark had become famous when the defendant began using the mark.

In addition, the new statute will change the state law in some other ways not covered in this article. ❖

Linda Friedman is a partner with Bradley Arant Boult Cummings, LLP and practices in its Intellectual Property Practice Group. Linda has over 30 years experience in intellectual property, antitrust and competitive torts. Linda is a past chair of the Alabama Bar Association's Section of Antitrust and Business Torts, and has lectured frequently on trademark and copyright topics, trade secret protection and state and federal antitrust issues. She may be reached at lfriedman@babbc.com or at (205) 521-8274. Her full bio may be found at <http://www.babbc.com/linda-a-friedman/>.

Intellectual Property Law and Entertainment Law In Alabama

Join us for a look inside the world of intellectual property, film, and music at the Second Annual CLE seminar, presented by Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, the Sidewalk Moving Picture Festival and the Intellectual Property, Entertainment and Sports Law Section of the Alabama State Bar.

Some of the topics to be discussed will include:

- *Borrowing or Stealing? How to Avoid Penalties Under the Fair Use Doctrine*
- *Brought to You By . . . , Product Placements in Film and Television*
- *The Music Industry, Where We Are and Where We Are Going*
- *From Page to Screen, A Look at Literary Publishing and Film Option Agreements*

Thursday, September 23, 2010

8:00 a.m. - 1:00 p.m.

Workplay Theatre

500 23rd Street South
Birmingham, Alabama

Immediately following, the IPE&S Section will host an afternoon CLE with additional programming and a cocktail reception.

For more information, please contact Stacey Davis,
205.244.3800 or sdavis@bakerdonelson.com.

Formal invitation and registration materials to follow.

Among many other accomplishments, Lee Huffaker served as an officer of the IP Section of the Alabama Bar. We have reproduced below a brief memorial to this great friend and colleague.

Memorial to Matthew Lee Huffaker

Lee Huffaker, age 33, a man of extraordinary talent, wit and breadth of interest, passed away unexpectedly and tragically on August 16, 2009.

Despite his quiet nature and palpable humility, Lee was a renaissance man.

He was a lawyer's lawyer – a patent attorney, a skillful litigator, an intellectual property expert, a corporate lawyer and a committed pro bono practitioner. In fact, Lee's legal accomplishments in the course of his short eight-year career were truly exceptional. Lee had successfully litigated multi-million dollar copyright, trade secret and patent cases. In 2005, he won a \$27 million jury verdict in a trade secrets case, one of the largest verdicts ever obtained in Jefferson County and one of the top 100 verdicts nationwide for the year. Lee was a member of the United States Patent and Trademark Office Bar and, at that time of his passing, was spearheading the effort to rewrite and modernize Alabama's state trademark act. He had been recognized by the Alabama State Bar in April 2006 for his outstanding work through the Birmingham Volunteer Lawyer Program. In one of many examples, Lee took on the cause of an indigent prisoner sentenced to life without parole, obtaining a reduced sentence and, eventually, parole. Similar to Atticus Finch, Lee was paid by a gift membership in the Cake-of-the-Month Club, all his client's family was able to afford.

Lee's scope of interests and breadth of expertise on matters outside the law were equally remarkable. He was an expert in computers, televisions, antique cameras, vintage watches, cars, clothes,

home remodeling, fountain pens, Italian road-racing bikes, power tools, grass seeds, grills, E-Bay, and internet discount coupons just for starters. Lee's expertise was widely accepted and renowned by all who came in contact with him. Lee took great pleasure in responding in comprehensive detail to continual inquiries on all of these subjects from his family, friends and law partners. Lee never wavered in making time for any friend or acquaintance in need of help or information, and he met all situations with a quiet chuckle, a twinkle in his eye and a good measure of ironic humor.

Raised in Montgomery, Lee was graduated from the Montgomery Academy and then from Vanderbilt University, *cum laude*, with a degree in chemical engineering. He received his J.D. from the University of Alabama School of Law in 2001, graduating *magna cum laude*, receiving the Dean M. Leigh Harrison Award, serving on the Alabama Law Review and being inducted into the Order of the Coif.

Lee leaves behind him a devoted wife, Caroline, two children, Ann Katherine (3) and Matthew Lee, Jr. (1), his parents, Robert and Kitty, and his brother, Austin.

Lee was fascinating, brilliant and loving. Lee was unique and special. Above all though, he was a kind and gentle soul. He will be greatly missed. ❖

Intellectual Property Entertainment and Sports Law Section Officers:

Chairman

Paul Sykes
*Bradley Arant Boulton
Cummings LLP*

Chairman-Elect

Russ Gache
Maynard Cooper & Gale, P.C.

Treasurer

Stacey Davis
*Baker, Donelson, Bearman,
Caldwell & Berkowitz, PC*

DISCLAIMER

This newsletter is a periodic publication of Intellectual Property Entertainment and Sports Law Section of the Alabama Bar and should not be construed as legal advice or legal opinions on any specific facts or circumstances. The contents are intended for general information only, and you are urged to consult your own lawyer or other tax advisor concerning your own situation and any specific legal questions you may have. For further information about these contents, please contact your lawyer.

The Alabama State Bar requires the following disclosure: "No representation is made that the quality of the legal services to be performed is greater than the quality of legal services performed by other lawyers."

©2010 Intellectual Property
Entertainment and Sports
Law Section of the Alabama
Bar