

Pending “B.I.R.D.I.E” Bill in Congress Proposes Copyright Protection for Golf Course Designs



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It is easy to criticize some endeavors of the U.S. Congress. Skepticism can rise further when the acronym of a bill's name appears to be overly clever, as is arguably the case with the pending “BIRDIE” Act, introduced by U.S. Reps. Fitzpatrick and Panetta in February.

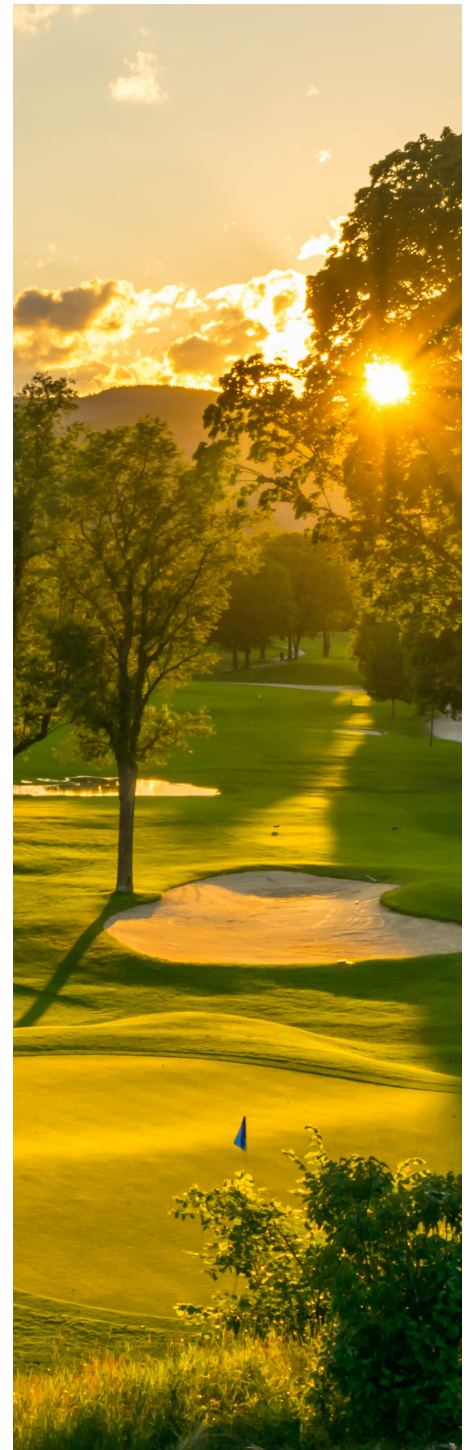
Why is this legislation proposed?

Despite the wincingly overly wrought acronym, the legislation highlights why intellectual property law must constantly evolve. Its full title is “Bolstering Intellectual Property Rights against Digital Infringement Enhancement”. Increased computing power and cheaper digital projectors make golf simulators affordable for almost every golf club, and even at-home setups. The golf simulator market is now currently valued at around \$2B/yr and estimated to double by 2030.

Importantly, the simulator companies enhance the user's experience by programming in famous golf courses. Instead of generic simulated holes, the user gets the full look and feel of great golf settings from around the U.S. and the world.

Why is the legislation based in copyright law?

The BIRDIE Act would explicitly extend copyright protection to golf course designs. In an interview with Sportico.com, sponsoring Rep. Fitzpatrick explained why: “Each artist, creator, or designer deserves the full protection of our copyright law, and golf course architects should be no different”.



Copyright law protects works of other creative professionals from unauthorized use or replication. Examples are photographers, screen writers, and musical performers. It is little-known that the U.S. Constitution Article I, clause 8, specifically empowers Congress to:

“promote the Progress of Science and useful Arts, by securing for limited Times to Authors and Inventors the exclusive Right to their respective Writings and Discoveries”.

The Constitution writers did so in reaction to English law where the King or government owned this type of intellectual property; not its creators. The U.S. Constitutional framework incentivizes bringing the new ideas public because the creator can, for limited time, control who and how others use it and make money from it.

The link to the 1990 expansion of copyright law to 3D architectural works

A recent example of expansion of copyright rights was the Architectural Works Copyright Protection Act of 1990. It made clear that architects could sue for infringement under copyright law against unauthorized 3D replication of their building designs. Prior to that legislation, all they could do was sue if they could show copying of their 2D architectural plans. This left a gap. Competitors argued they could copy a building plan so long as they did not access and copy the 2D plans.

What does the BIRDIE Act cover?

With respect to golf course designs, Rep. Fitzpatrick further said: “Piracy and unauthorized replication of golf course design in digital or virtual simulations threaten the livelihoods of the profession.” Sportico.com. The BIRDIE Act essentially amends the Copyright Act’s Section 101 definition of “architectural works” to include golf course designs. Importantly, the definition covers not only the overall layout of the golf course holes from teeing ground to green, but also landscaping irrigation system, paths, greens, tees, practice facilities, bunkers, lakes, and topographical features.

One limitation of BIRDIE is that it would apply only to courses and course features “created on or after Dec. 1, 1990”. Are legendary courses such as Pebble Beach (founded in 1919) or Augusta National (founded in 1930) out of luck? The broad definition of the BIRDIE Act helps on this point. Even these old courses are periodically updated or redesigned.

At least the updated versions may qualify for this copyright protection.

Take-Aways

The BIRDIE Act is a good example of Congress doing its duty under the Constitution of promoting the “arts and sciences” for “authors and inventors”, particularly in light of new or evolving market conditions and technologies.

It will affect the golf industry, particularly allowing golf course designers greater control over their works against unauthorized use or replication, whether in the real or digital world.

But it has broader implications. For example, some courts have denied copyright protection to landscape architects such as for living gardens. Reasons include the plants grow and change over time and, thus, the design is not fully that of human authorship.

Perhaps more importantly, both the U.S. Copyright Office and the courts are struggling with whether artificial intelligence (“AI”) is copyrightable for a similar reason. The argument is that it is not completely human authorship. This new expansion of what is considered copyrightable might influence expansion of protection in the AI world.

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Evidence of a Motivation to Combine Prior Art References is Required for a Valid Obviousness Rejection



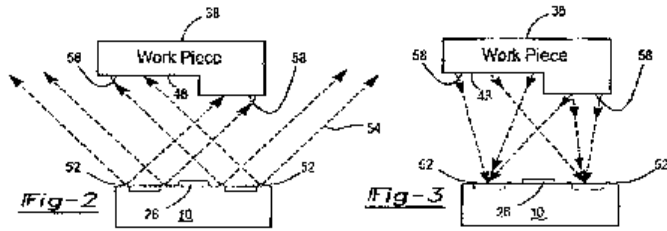
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On March 27, 2024, the United States Court of Appeals for the Federal Circuit concluded that there must be evidence of a motivation to combine references to create a valid obviousness rejection (35 U.S.C. §103) in *Virtek Vision Int'l U.L.C. ("Virtek") v. Assembly Guidance Sys., Inc. dba Aligned Vision ("Aligned Vision")*, 97 F.4th 882 (Fed. Cir. Mar. 27, 2024).

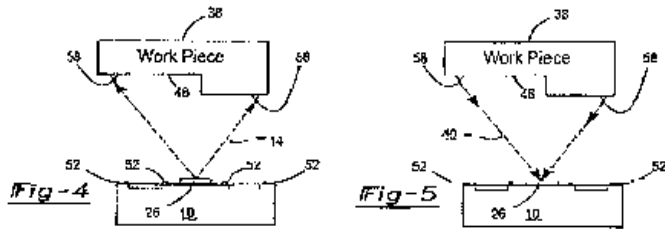
Virtek owns U.S. Patent No. 10,052,734, which discloses an improved method for aligning a laser projector with respect to a work surface where lasers are used to project a template image onto a work surface to direct manufacturing processes. To accurately project the template onto a three-dimensional work surface, there must be "precise calibration of the relative position between the work surface and the laser projector" so that the laser projector is aligned. Virtek, at 885.

In the prior art, laser projectors would be aligned by locating reflective targets on the work surface, measuring the target coordinates relative to a three-dimensional coordinate system of the work surface, and then locating the position of the projector relative to the work surface. Unfortunately, this scanning process is periodically stopped "to check for variation in the projected pattern location due to a change in the position of the projector relative to the tool" where "[i]f any variation is detected, the targets are relocated and the laser projector must be realigned, rendering the process [both] slow and inefficient." *Id.*

To overcome these deficiencies, Virtek's '734 Patent provides an improved two-part alignment system. First, a secondary light source determines the pattern of targets on the work surface.



Second, a laser beam scans the targets as directed by the identified pattern and calculates the precise location of the targets to direct the laser projector where to project the laser template image.



Aligned Vision petitioned for inter partes review of all claims of the '734 Patent. Specifically, Aligned Vision argued claims 1, 2, 5, 7, and 10–13 would have been obvious over Keitler (U.S. Patent Publication No. 2014/0160115A1) and Briggs (PCT. Pub. No. WO2012/033892A1) (Ground 1), and over Briggs and Bridges (U.S. Patent No. 8,040,525) (Ground 3). It also argued claims 3–6 and 8–12 would have been obvious over Keitler, Briggs, and Rueb (U.S. Patent Publication No. 2013/0250094A1) (Ground 2) and over Briggs, Bridges, and Rueb (Ground 4).

The Patent Trial and Appeal Board held Aligned Vision had proven unpatentability based on Grounds 1 and 3 but failed with regard to Grounds 2 and 4.

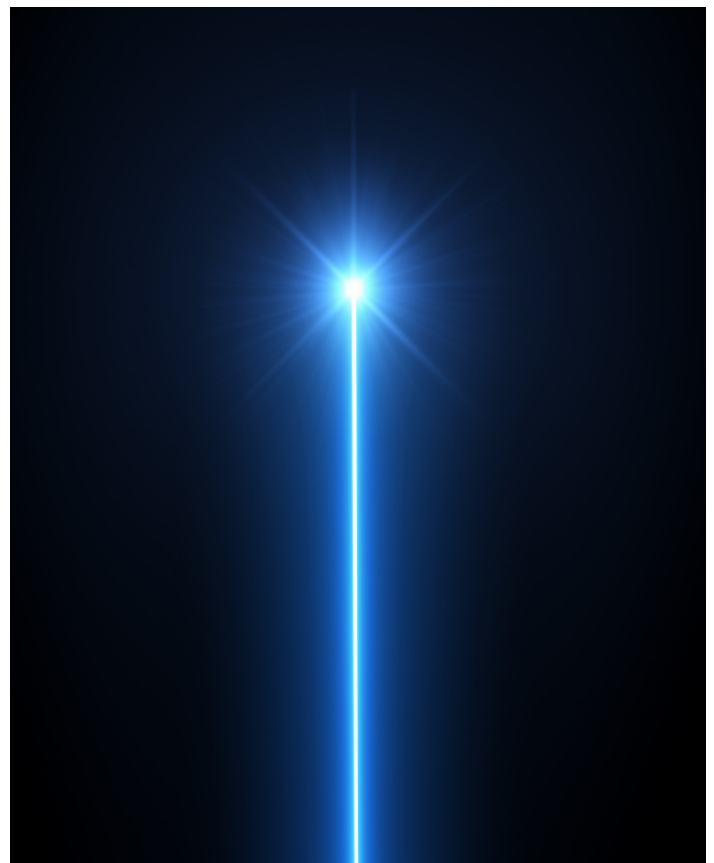
The Court held that *KSR, Int'l Co. v. Teleflex Inc.* ("KSR."), 550 U.S. 398, 421 (2007) provides an important understanding of the circumstances in which limitations from different references can be combined to conclude that a claimed invention would have been obvious. In KSR, the Supreme Court explained, "[w]hen there is a design need or market pressure to solve a problem and there are a finite number of identified, predictable solutions, a person of ordinary skill has good reason to pursue the known options within his or her technical grasp." KSR, at 421.

"If this leads to the anticipated success, it is likely the product not of innovation but of ordinary skill and common sense." *Id.*

However, "KSR did not do away with the requirement that there must exist a motivation to combine various prior art references in order for a skilled artisan to make the claimed invention." Virtek, at 887. In this case, there was no argument about common sense or any evidence about the number of identifiable and predictable solutions to the problem. There was nothing other than an assertion that because two coordinate systems were disclosed in prior art references, it satisfies the motivation to combine analysis. This was held to be an error as a matter of law since it does not suffice that simply two solutions are known, but the reason for the combination must exist.

Therefore, the PTAB's ruling with regard to Grounds 1 and 3 was overturned and maintained for Grounds 2 and 4.

Consequently, a persuasive argument for overcoming a rejection under 35 U.S.C. § 103 is whether the United States Patent and Trademark Office has put forth a logical reason as to why an individual with ordinary skill in the art would be motivated to combine references.



Trademark Registrations and Keeping Up with Changing Technology



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In the world we live in, technology is always changing, and businesses need to change with the times to stay competitive. This can be problematic in regard to maintaining historic trademark registrations. Imagine for example that your mark is registered in Class 9 in connection with “educational software, namely CD-ROMs”; but you no longer sell CD-ROMs and instead sell educational software via a mobile app that can be downloaded from any mobile device. Or perhaps your mark is registered in Class 16 for printed children’s books, but you now only offer children’s books in a downloadable format. At the time of renewal, do you have to abandon your registration? Hopefully not.

In recognition of the “in-use” requirement for renewals and the ongoing technology changes, the USPTO provides trademark owners with the option, under limited circumstances, to file a “Petition to allow amendment due to technology evolution” to allow amendment to the identification of goods or services to change the nature of the listed goods/services. You may be eligible if you provide the same fundamental goods or services through an updated means, method, or format and the underlying content or subject matter has not changed.

In order to be accepted, this Petition must include a Declaration from the Trademark Owner confirming: (1) Based on changes due to evolving technology, you cannot show use on the original goods or services; and (2) You currently use the trademark on goods or services in a manner or medium reflecting the evolved technology, and the underlying content or subject matter remains unchanged. You must also provide dates of first use anywhere and in commerce for the “evolved” goods, and specimens showing use of the same. Further, if the amendment requires a class change (e.g., moving to Class 9 (downloadable

books) vs Class 16 (printed books), you may also be required to pay an additional class fee. Significantly, any amendment will only be accepted if, after a search of the USPTO records, the USPTO concludes the amendment will not result in any potential third-party confusion with existing applications/registrations.

It is also important to note that if your amendment is accepted, the amendment will be re-published in the Official Gazette for opposition purposes and a new Section 15 declaration of incontestability cannot be filed for at least five years from the date of acceptance of the amendment.

One final consideration is that a “Petition to allow amendment due to technology evolution” may be denied if you still use the trademark on the original goods or services or on other goods or services identified in the registration containing the same underlying content or subject matter. By way of example, if your registration identifies your goods as “phonograph records and audio tapes featuring music,” you would not be eligible to amend the goods to “phonograph records featuring music and mobile application software for music streaming.” This is because you still provide phonograph records, which have the same underlying content (i.e., music) as your evolved goods. Instead, you would need to delete the audio tapes that are no longer in use from the registration and file a new application to seek registration of your mark for the evolved mobile application goods. In other words, this Petition may not be used to effectively add new goods/services to an existing registration.



When Labels Matter: Variety Naming and Seed Label Requirements of the Federal Seed Act



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The Federal Seed Act (FSA) is a “truth-in-labeling-law” that works in conjunction with the Plant Protection Act to regulate agricultural and vegetable seed shipped in interstate or foreign commerce. The FSA requires, among other things, that naming of agricultural and vegetable varieties follow certain criteria and that seed containers shipped between states or countries be labeled with certain quality information to allow consumers to make informed choices.

Variety Naming

Although the United States does not have a mandatory plant variety registration system, under the FSA once a variety has been traded or sold under a name, that name cannot be changed and the name can never be used for another variety of the same kind. Since the 1890s, the United States Department of Agriculture (USDA) has kept track of all agricultural and vegetable seed varieties sold in the United States and maintained a database of variety names. The USDA offers the “Variety Name Clearance Program” to assist companies in reducing the chances of variety name conflicts and FSA violations.

In order to comply with the FSA, there are a number of guidelines that must be followed in choosing a variety name. For example, the same name cannot be given to more than one variety of the same kind or a closely related kind (i.e. pumpkins and squash or wheat and triticale), and a variety name cannot be misleadingly similar to an existing name. Additionally, there are special guidelines for turfgrasses and for names including a trademark.

The process for requesting variety name clearance is relatively straightforward. Requests can be submitted using the USDA's online application or by emailing requests directly to the USDA's seed specialist. The USDA will compare the proposed name with variety names already in the database to determine if the variety name has already been used or if it is too similar to existing names. Assuming there is no conflict, a clearance letter will be issued. Otherwise, an explanation of any conflict will be sent.

There are some caveats to variety name clearance. When an applicant receives a clearance letter, the applicant should understand that the clearance is not a guarantee that the name is free of conflicts.

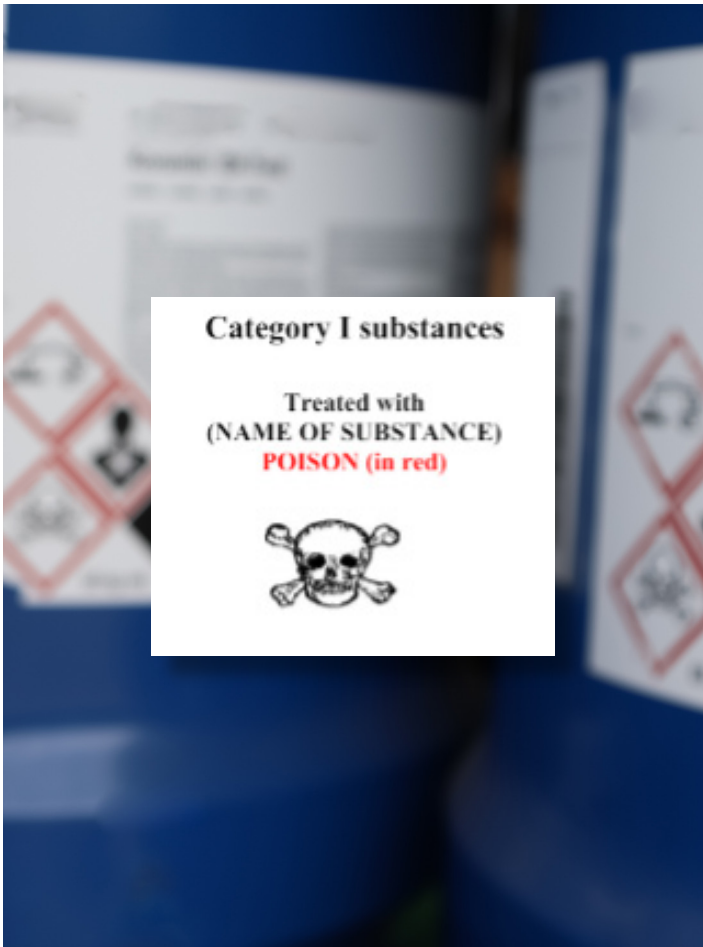



Furthermore, the clearance does not establish a legal right to the variety name and the USDA does not make determinations regarding potential trademark infringement of a proposed variety name.

A variety name entry into the database becomes permanent when the variety is released into the marketplace under that name. Once the variety has been released, the name cannot be changed. Thus, the USDA requests all applicants to inform them once a variety has been released. This ensures that the database is kept as accurate as possible.

Seed Labeling

Under the FDA regulations, seed labels must include, at minimum, seed purity percentage, number of noxious weed seed per pound, chemical seed treatment (if any), kind and varietal identification, and the name and address of the international shipper. The U.S. Department of Agriculture’s (USDA) Agricultural Marketing Service (AMS) has recently clarified that there is absolutely no exception to the requirement for variety and kind labeling of seed shaped interstate. For certain seed kinds, including many common agricultural crops, it is permitted to label the seed with just the kind name and the phrase “variety not stated”.



 Best Seed <small>Best Seed - 789 West Hwy - Arroyo, USA</small>	
Growing Degree Units Black Layer: 2650	Mid-Pollination 1420
Lot. No. 23AB45V	Hybrid Seed Corn
Variety: Pretty Corn	Pure Seed: 99.00%
Kind: Field Corn	Other Crop Seed: 0.60%
Date Tested: 01/24	Noxious Weeds/lb: NONE
Germ. 95%	Inert Matter: 0.40%
Origin: IA	Weed Seed: 0.00%

Further, the brand name must be clearly differentiated from the kind or variety name. This is to avoid creating the impression that the brand is a kind or variety. For example, “Amazing Field Corn” could cause confusion as to whether “Amazing” is the brand, variety, or kind. However, “Amazing Brand Field Corn” would be sufficient to distinguish the brand. For seed sold in mixtures, there are additional rules to ensure that labels do not give the representation that a brand contains a single variety when it is, in fact, a mixture. Treated seed also requires special labeling. The Environmental Protection Agency (EPA) classifies the

most toxic of seed treatments as “Toxicity Category I chemicals”. Under the FSA regulations, labelling requirements for treated seed differs for seed treated with a Toxicity Category I chemical and seed treated with a non-Category I chemical. Seed treated with a Category I chemical is required to be labeled with the name of the substance, a skull and crossbones at least twice the size of the typeface, and one of the following phrases in red font: “This seed has been treated with Poison,” “Treated with Poison,” “Poison treated,” or “Poison.” Non-Category I treated seed must be labeled with the phrases “Treated with (name of substance)” and “Do not use for food, feed, or oil purposes.”

The variety naming and seed labeling requirements of the FSA help minimize potential confusion and ensure that seed shipped interstate are labeled truthfully. This protects consumers from buying non-viable, unfit, contaminated, toxic, and/or mislabeled seed. For those having plant-related IP portfolios, particularly if the interstate shipment of seed is commonplace, compliance with the FSA regulations should be one of many considerations discussed with a qualified attorney.

World Intellectual Property Indicators 2023 and Beyond



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Trademark scams aimed at trademark registrants and applicants are common. The perpetrators are seeking to illegitimately acquire money or confidential information. As with most scams, some are ham-fisted and easy to spot, but many are subtle and require diligence to avoid. Below is some information that can help spot these scams and recommendations on how to avoid them.

Did you know that the World Intellectual Property Organization (WIPO) provides annual updates and overviews on intellectual property activities in an annual report? The annual WIPO report provides a plethora of information and statistics associated with global filings for patents and trademarks. The data is generated from approximately 150 patent offices globally.

This summary of the World Intellectual Property Indicators – 2023, focuses on global patenting activity based on data through calendar year 2022. All data referenced herein were obtained from the World Intellectual Property Organization (2023). IP Facts and Figures 2023. Geneva: WIPO. (See DOI: 10.34667/tind.48648.)

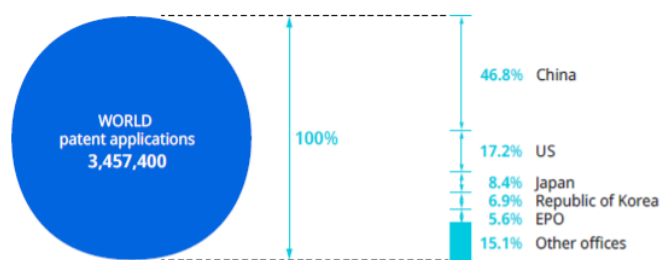
The 2023 reports showed a third consecutive increase in global patent filings and set another record for global patenting activity – nearly 3.46 million patent applications filed in 2022 (3,457,000 total filings)! The United States, China, Republic of Korea and Germany were the leading countries with highest numbers of patent filings.

This record was notably driven by patentees in China, which represent close to half of all global patent applications. Residents in China filed approximately 1.58 million patents applications when including domestic and foreign patent filings. After China's staggering number of patent applications, the United States (505,539), Japan (405,361), Republic of Korea (272,315) and Germany (155,896) followed. Compared to the previous year, these numbers represented increases for China, the United States and the Republic of Korea, but decreases in filings by residents in Germany and Japan.

A notable increase in patent filings was again recorded in India. Continued growth in India in 2022 marked the 11th consecutive year of India having the largest growth (31.6% increase) in patent filing by its residents. The next largest growth was achieved by Switzerland (6.1% increase) and thereafter China (2.5% increase).



So where are these patent filings being made? As may be expected the majority of patent filings are made globally within a few patent offices. Nearly 85% of all global patent filings are made with the top five patent offices as shown here.



EPO is the European Patent Office.

Source: WIPO Statistics Database, August 2023.

Again a clear trend is the dominance of the number of filings made with the China National Intellectual Property Administration (CNIPA, the Chinese Patent Office) by Chinese applicants. This majority share of the global patent filings with CNIPA has seen a vigorous increase – from 27.7% in 2012 to 46.8% in 2022. For reference, during this same period the United States experienced a decline from 23% to 17.2% of the global filings made with the U.S. Patent and Trademark Office.

The continued increases in global patent filings leads one to naturally ask what technologies are leading the way. Due to lags in substantive data available the latest published application data is available from 2021, which shows that computer technology is the most frequently filed technology worldwide. Computer technology related inventions represent 11.1% of the global patent filings. When looking at published PCT applications in 2022 the top filer was the Chinese telecom company Huawei Technologies (7,689 applications), followed in second by the Republic of Korea company Samsung Electronics (4,387 applications) and thereafter by the United States company Qualcomm (3,855 applications).

Computer technology is followed by electrical machinery (6.4%), measurements (5.8%), medical technologies (5.2%) and thereafter digital communications (4.9%). Also of interest are the areas of most significant growth in patent filings. These were seen by patent filings classified as chemical engineering (11.4% increase), computer technologies (11% increase) and IT methods (13.7% increase).

The continued upward trend in global patent filings presents an optimistic outlook for global

economies as well as the continued emphasis by the world's leading economies on intellectual property protections. Many (this author included) feared the 2020 global pandemic as well as other global, political and socio-economic challenges might have a long-term chilling effect on intellectual property. It is encouraging to see the activities of innovators around the globe have continued to increase.

Circling back to the source of this data, the World Intellectual Property Indicators – 2023, it seems appropriate to close with the words of WIPO's Director General Daren Tang:

"IP filings have braved the pandemic to continue to grow, powered by increased levels of innovation, creativity, entrepreneurship and digitalization in all parts of the world. Developing countries are increasingly engines of IP, showing the greatest growth rates as they harness the innovation and creative potential of their people."

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Words are Actually Important:

Understanding the “Why” of “Patent-ese”



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Patents can be quite verbose, with pages upon pages describing inventions and claims that tangle words so much that they are often no longer understandable as “normal” English. But this wordiness isn’t just so that patent attorneys and agents can show off their expansive vocabulary-- there are real reasons why patents use this not-English English colloquially known as “patent-ese”. Broadly speaking, in the United States a patent must have utility, novelty, and be non-obvious. This is codified in the U.S. Code (U.S.C.) under sections 101, 102, and 103, respectively. In addition to these requirements, the patent must also provide written support for what it seeks to protect and be able to enable a person having ordinary skill in the art to make and use the invention, which are codified in section 112.

Further clarifying U.S.C. 101, the U.S. Supreme Court has held that laws of nature, natural phenomena, and abstract ideas are not patent-eligible unless the invention includes an “inventive concept” that transforms the invention beyond the ineligible subject matter. Accordingly, the Court has said that integration of an abstract idea, law of nature or natural phenomenon into a practical application may be eligible for patent protection. In the landmark Alice case, the Court explained that “in applying the §101 exception, we must distinguish between patents that claim the ‘buildin[g] block[s]’ of human ingenuity and those that integrate the building blocks into something more” and stating that Mayo “set forth a framework for distinguishing patents that claim laws of nature, natural phenomena, and abstract ideas from those that claim patent-eligible applications of those concepts”. See Alice Corp. and Mayo. See also MPEP § 2106 (describing the Alice-Mayo test).

Additionally under U.S.C. 102 and 103, an invention must be new or novel and must not be obvious to a person with ordinary skill in the relevant technical field. Under these sections, the invention is compared to other patents or publicly disclosed materials (e.g., articles, published patent applications, websites, etc.). Thus, it can be important when drafting a patent to generally search for these materials to know what is known in the relevant technical field. It can be important to look for anything that may be related to the invention to get a clear understanding of the “state of the art”. This information can be utilized to identify a “window of operation” or clearer boundaries protectable by a patent.

Thus, when drafting a patent it is important to have robust specifications. Generally, the more clarity provided and the more aspects of the invention described, the better. Sometimes, it can be beneficial to tell a story of how the invention came to be such as a brief discussion of the current products that are similar to the invention and their failures or downfalls. Similarly, it can be important to highlight difficulties that arose while trying to perfect the invention, including things that didn’t work, as well as the happy accidents or unexpected results that furthered the development of the invention. All of these insights into the research

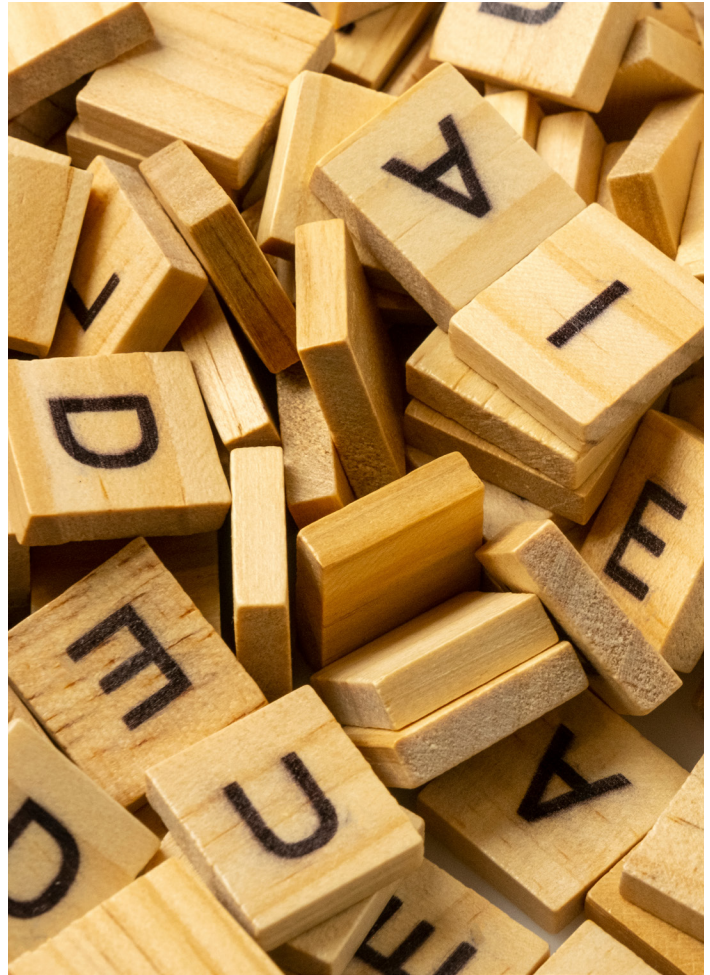
and development of inventions can help more fully illustrate the utility, novelty, and non-obviousness of the invention.

Finally, under U.S.C. 112, the patent must be clear and concise in the manner and process of making and using the invention in order to convey to a person skilled in the technical field that the inventor(s) had possession of the invention. Thus, it is of the upmost importance to clearly describe everything the patent seeks to protect. There are many ways to describe an invention beyond using words, such as figures, diagrams, chemical structures, and formulas, but most of the description is usually written. By providing working examples or a “story” for how the invention came to be helps to “enable” the patent and can further help provide clarity of the invention.

Further, certain words or descriptions in the body of a patent application, such as “about” or “generally”, can help define parameters of the invention but sometimes using these words or phrases in the claims can be unclear. There have been cases where seemingly unambiguous words have been interpreted differently than their typical definitions, such as “a” generally being interpreted as “one or more”.

In ABS Global, Inc. v. Cytonome/ST, LLC, 84 F.4th 1034 (Fed. Cir. 2023), the Federal Circuit Court held that generally using “a” or “an” before a noun in an open-ended claim typically means “one or more” unless context dictates otherwise. The Federal Circuit found that in two other cases, Salazar v. AT&T Mobility and Finjan LLC v. SonicWall, Inc., that narrower interpretations of “a” or “an” were needed. In Salazar, the claim was directed to a communication system with various components controlled by “said microprocessor”. The Court found that the claim term “a microprocessor” only referred to a single microprocessor to control all the components of the communication system. Salazar v. AT&T Mobility, 64 F.4th 1311 (Fed. Cir. 2023). Similarly, in Finjan, the claims were directed to “a computer” that performed scanning, but later in the claims “the computer” performed other functions. The Court found that the use of “the computer” referred back to “a computer” and thus only required the use of a single computer that could perform all of the claimed functions. Finjan LLC v. SonicWall, Inc., 84 F.4th 963 (Fed. Cir. 2023).

Cases have also clarified that, “and” can mean “and/or”, and “or” means exclusivity. In Kaufman v. Microsoft Corp., 34 F.4th 1360 (Fed. Cir. 2022), the Federal Circuit also found that claims directed to user operations



of “creating,” “retrieving,” “updating,” and “deleting” records in the database reasonably referred to alternatives and conjunctive requirements, meaning “and/or”. In Kustom Signals, Inc. v. Applied Concepts, Inc., 264 F.3d 1326 (Fed. Cir. 2001), a claim was directed to a method of processing Doppler return information that searched for components that “meets preselected magnitude or frequency criteria”. The Federal Circuit confirmed that “or” referred to designating exclusive alternatives. Moreover, incorrect or lacking punctuation in claims can render the scope of the claims unclear or, even worse, cause them to be interpreted in a different manner than originally intended. See e.g., Cultor Corp. v. A.E. Staley Mfg. Co., 224 F.3d 1328 (Fed. Cir. 2000).

In the world of patents, each term and phrase used can be consequential. Knowing the background and “why” patent attorneys and agents use certain strategies in drafting patents can provide inventors better understanding of the process of protecting their inventions. Although patent specifications can seem like a jumble of words and claims can seem to push the limits of the grammar we learned in school, every word is important for creating a great patent.

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[South Dakota Enterprise Institute Innovation Expo \(east\)](#)

September 24, 2024 – Sioux Falls, South Dakota

Jonathan Kennedy, Partner practicing in Intellectual Property Law and Litigation and Chair, [MVS Litigation Practice Group](#) is participating

[AUTM Western Region](#)

September 24-25, 2024 – Phoenix, Arizona

Heidi Sease Nebel, Patent Attorney and Chair, [MVS Biotechnology and Chemical Practice Group](#)

Vanessa Lancaster, Ph.D., Patent Attorney and MVS Senior Counsel

MVS is the sponsor of the event

[Power of Connection Women Series Event - Inspiring Women in Business](#)

September 6, 2024 - West Des Moines, Iowa

Cassie J. Edgar, Patent Attorney and Chair, [MVS Regulatory Law Practice Group](#) and co-chair, [Data Privacy and Cybersecurity Practice Group](#), is a panelist at the event

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