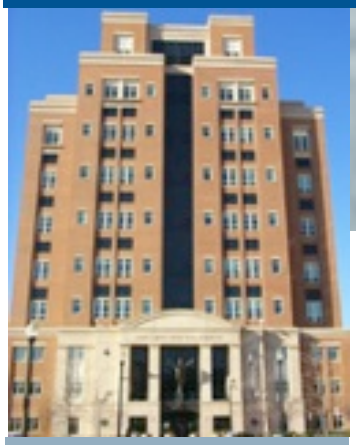

The Rocket Docket News

The Newsletter of the Northern Virginia Chapter of the Federal Bar Association

PRESIDENT'S COLUMN

By R. Scott Caulkins
Caulkins & Bruce, PC

The Northern Virginia Chapter just received notice that it will receive the FBA's 2013 Chapter Activity Presidential Excellence Award in September. This is the highest Chapter Activity award and is "awarded to chapters that excel in all areas and go above and beyond the minimum requirements of chapters." Our chapter is one of the largest and most active chapters of the Federal Bar Association. Its mission is to promote the education and professional development of members of the federal bar in Northern Virginia through continuing legal education programs and other events. The Chapter also provides opportunities for the legal community to hear directly from the judges and court personnel about best practices before the court. The Chapter holds regular events structured to provide members an opportunity to network with experienced lawyers who regularly practice before the court. Over the years the Chapter has expanded its programs to fulfill its mission and there are more opportunities for members to participate in Chapter activities than ever before.

Since October 2012 our Chapter has held nine continuing legal education programs focused on topics of interest to federal practitioners, including the annual Introduction to the Courthouse Program in April and the Bench-Bar Dialogue in May. This year's Introduction to the Courthouse Program drew a record number of lawyers who were admitted to the bar of the Court. On January 10, 2013 the Chapter sponsored a CLE program on Bankruptcy Court litigation, featuring Judge Stephen Mitchell (Ret.). The program was designed for lawyers who do not routinely appear in bankruptcy court, but many seasoned bankruptcy lawyers took advantage of the opportunity to hear Judge Mitchell speak on the subject. On May 1, 2013 the Chapter assisted the Court in sponsoring a Law Day event celebrating the 150th Anniversary of the Emancipation Proclamation. The Chapter held its Third Annual Luncheon meeting on June 11, 2013 with a state of the court presentation by Judge Brinkema. Back by popular demand, on July 23, 2013 the Chapter sponsored a U.S. Supreme Court Review CLE luncheon program. The Chapter golf tournament (which was postponed last fall due to hurricane Sandy) was held in April and we have tentative plans to hold another this fall. On September 17, 2013 we will hold the Annual Torrey Armstrong Memorial Lecture at the George Washington Masonic Memorial in Alexandria. This year's speaker is John Keith, a highly respected attorney in Northern Virginia and the former President of the Virginia State Bar. The event will also feature the introduction of the judge's law clerks for 2013-2014 and you will have an opportunity to meet them during a reception immediately following the program. By the end of September, the Chapter will have had a total of 12 CLE programs and networking events over the last year.

The success of the Chapter is due to a hard-working Board and the incredible support we receive from the judges and court personnel. As I said at the Chapter's annual meeting in June, the willingness of the judges and court personnel to participate in our programs throughout the year is the major reason why our programs are so successful. If you want to know how you can become active in the Chapter, please talk to any of our Board members listed on the front page of this Newsletter. We are always looking for articles for the Newsletter and ideas for future CLE programs. At our annual meeting in June we voted to increase the number of Board members from 9 to 12 to keep pace with the ever growing agenda of the Chapter. We already have programs for the winter and spring. So stay tuned, there is much more to come.

We look forward to seeing you at the Armstrong Lecture on September 17th!

Recent Chapter Events

INTRODUCTION TO THE COURTHOUSE PROGRAM WELCOMES NEW MEMBERS

In April, 92 lawyers attended the 16th annual Introduction to the Courthouse Program. The program is an initiation to practice in the Rocket Docket, and involves speakers from every branch of the courthouse family including: the district, magistrate, and bankruptcy judges, the U.S. Attorney's Office, the Federal Public Defender, the Clerk's Offices of both the Fourth Circuit and the Alexandria Division, the Marshal's Office, and Pretrial and Probation Services. The Northern Virginia Chapter of the Federal Bar Association moved the admission of all the qualified new practitioners and hosted a reception following the program.

We thank all the speakers and all the attendees, but give special recognition to Judge Brinkema and Ms. Lorri Tunney, without whom this program would not be possible.

INAUGURAL LAW DAY EVENT

On May 1, in conjunction with the United States District Court for the Eastern District of Virginia, the Chapter co-sponsored the first Law Day lecture. The theme of this year's national Law Day was the sesquicentennial of the Emancipation Proclamation. We were very lucky to have Professor Paul Finkelman speak. He is the President William McKinley Distinguished Professor of Law and Public Policy and Senior Fellow in the Government Law Center at Albany Law School. Professor Finkelman has written many books and articles about slavery, including *Defending Slavery: Proslavery Thought in the Old South: A Brief History with Documents* (2003); *Slavery in the Courtroom* (1985), which received the Joseph L. Andrews Award from the American Association of Law Libraries; *His Soul Goes Marching On; Responses to John Brown and the Harpers Ferry Raid* (1995); and *Slavery and the Founders: Race and Liberty in the Age of Jefferson* (second edition, 2002).

The lecture was entitled "How a Railroad Lawyer Became the Great Emancipator," and provided little known facts about the "boring" Emancipation Proclamation, that Professor Finkelman described as "about as exciting as a bill of lading." In addition, he focused on the southern states' secession articles that included numerous references to the north's anti-slavery campaign as the reason for secession, dispelling the commonly held notion that the states seceded for reasons related to state's rights, high tariffs, and taxes. There was a lively discussion with the audience and a reception following the event. The attendees were truly enlightened, and we thank Professor Finkelman for such a lively lecture.

ANNUAL MEETING HELD

On June 20, 2013, the Chapter held its annual meeting at a luncheon at the Westin across the street from the courthouse. This was the third year that the annual meeting was held with this format and the program drew over 70 people, including many judges and their law clerks. At the meeting, the Honorable Leonie M. Brinkema was kind enough to deliver a "State of the Court" presentation in which she discussed various topics including filing statistics for the court. She also provided a gentle reminder about the redacting personal information from court filings (*See* Clerk's Corner page 3 for details about redactions). In addition, the membership elected its slate of officers and directors based upon the following new amendment to the by-laws:

> The Board of Directors of the Chapter shall consist of the officers listed in Article V, Section 1 of these By-Laws, the immediate past President of the Chapter, and six (6) additional

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EDVA CLERK'S CORNER:

THE COURT IS PLEASED TO ANNOUNCE THE PUBLICATION OF *FROM MARSHALL TO MOUSAOUI: JUSTICE IN THE EASTERN DISTRICT OF VIRGINIA* BY JOHN O. PETERS, THE FIRST COMPREHENSIVE HISTORY OF THE E.D. VA. FOR ADDITIONAL INFORMATION ABOUT THE BOOK, VISIT WWW.HISTORYEDVA.COM

REDACTION REMINDER: All filings with the court - including attachments - must comply with Fed. R. Civ. P. 5.2 or Fed. R. Crim. P. 49.1. The following personal identifying information must be redacted from all documents filed with the court, whether the document is filed electronically or in paper form:

Social Security or taxpayer- identification numbers;
Dates of birth;
Names of minor children;
Financial account numbers; and
Home addresses in criminal cases.

The foregoing may not appear, except as allowed by the applicable rule. Pursuant to Local Civil Rule 7(C)(2) and Local Criminal Rule 47(C)(2), counsel and the parties (to include pro se litigants) are responsible for redacting personal identifiers in documents filed with the Court. The clerk will not review each pleading for redaction.

Recently an electronic document was filed which had not been redacted correctly. The Court would like to remind attorneys that the easiest way to redact a document is to print the document, mark through the sensitive information, and then scan the document to PDF. If you choose to electronically redact a document, please see http://www.fas.org/sgp/othergov/dod/nsa-redact.pdf for additional information.

Recent Chapter Events continued from page 2

directors who shall be elected from the membership of the Chapter. Each director who is not an officer of the chapter shall assume his or her duties on October 1, and shall hold his or her position as director for one year or until his or her successor is duly elected or appointed."

At the annual meeting, the following people were elected to positions on the board:

President- Damon Wright
President-Elect- Caitlin Lhommedieu
Vice-President and Membership Chair- George Kostel
Secretary- Chip Molster
Treasurer- Laurie Hand
National Delegate- The Honorable Ivan Davis
Directors:
Craig Reilly
Anne Devens
Tom Connally
Bill Porter
Kathleen Holmes

PRELIMINARY INJUNCTION CLE

On March 20, 2013, Stephen A. Cobb Esq. and Jonathan D. Frieden, Esq., partners in the litigation group in the Northern Virginia based firm of Odin, Feldman & Pittleman P.C., along with the Honorable Leonie Brinkema, presented a CLE entitled "Temporary Restraining Orders and Preliminary Injunctions in the Rocket Docket." After reviewing the substantive history of the standards for injunctions, tracing the origins from *Blackwelder* to *Winter* to *Real Truth*, the CLE focused on a best practices approach for successful injunction hearings. With near thirty attendees, spirited discussion provided a detailed examination on a range of issues including best evidence and hearing techniques to what legal subject matter best lends itself to preliminary injunctive relief.

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Fourth Circuit Limits Recovery of Costs Related to E-Discovery

By S. Mohsin Reza, Esq. and K. Nicola Harrison, Esq.*

* S. Mohsin Reza and K. Nicola Harrison are associates with Troutman Sanders LLP and are members of the firm's Financial Services Litigation and Business Litigation practice groups. S. Mohsin Reza is also a member of the firm's Electronic Discovery & Data Management team.

In an era of burgeoning electronic discovery costs, prevailing parties often try to recoup their e-discovery expenses by asking courts to tax them as recoverable costs under the federal taxation-of-costs statute. Until a recent decision by the United States Court of Appeals for the Fourth Circuit, it was unclear "whether ESI-related production and copying costs are recoverable under" the statute. *United States v. U.S. Training Ctr., Inc.*, 829 F. Supp. 2d 329, 336-37 (E.D. Va. 2011) (noting that "applicable precedent from other jurisdiction varies"). The Fourth Circuit addressed the issue in *Country Vintner of N.C., LLC v. E. & J. Gallo Winery, Inc.*, 718 F.3d 249 (4th Cir. 2013) and its decision will have an impact on nearly every case in this District that involves significant electronic discovery.

In *Country Vintner*, the Fourth Circuit examined whether the expenses related to the discovery of electronically stored information ("ESI") should be taxed under 28 U.S.C. § 1920(4) as fees "for exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case." Early in the litigation, the parties clashed over how to conduct the discovery of ESI. Complaining that Country Vintner's discovery requests were unduly burdensome and expensive, Gallo sought a protective order from the court. The district court denied the motion for a protective order and ordered Gallo to run searches on archived e-mail and documents created in a one-year period by eight identified custodians using 16 search terms proposed by Country Vintner. Gallo then gathered more than 62 GB of data that its lawyers processed. Less than two months after Gallo began producing documents, the district court granted its motion to dismiss one of the two claims asserted in the Complaint. The parties then filed cross-motions for summary judgment on the remaining claim, and the district court granted summary judgment in favor of Gallo.

Gallo filed a bill of costs requesting $111,047.75 from Country Vintner for e-discovery charges in six categories: (1) initial processing of ESI via decompressing container files, making the data searchable, and indexing the data, (2) extracting and indexing metadata, (3) conversion of native documents to a TIFF or PDF format, (4) electronic bates numbering, (5) copying images onto a CD or DVD, and (6) management of the processing of the ESI. Adopting the Third Circuit's reasoning from *Race Tires Am., Inc. v. Hoosier Racing Tire Corp.*, 674 F.3d 158 (3d Cir. 2012), the district court concluded that a prevailing party may only recover costs associated with copying or duplicating files. Consequently, the district court found that the only discernible ESI-related charges that could be recovered were TIFF and PDF production and copying images onto CD. The district court awarded $218.59 in ESI-related costs and $350.00 for "fees of the clerk." (The fees have since increased to $400.)

In affirming the lower court's decision, the Fourth Circuit examined the history of the federal taxation-of-costs statute and noted the legislative intent to

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E-Discovery Costs

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only allow the taxing of costs in a very limited way. The Fourth Circuit applied the ordinary meaning of the phrase "making copies" to define the phrase as "producing imitations or reproductions of original works." While the ordinary meaning is expansive, the Fourth Circuit found that the broader context of the statute circumscribed the application of the phrase "making copies."

Gallo argued that processing of the ESI other than the TIFF/PDF production and burning of files to disks was necessary in order to copy *all* integral features of the ESI. Endorsing the Third Circuit's reasoning in *Race Tires*, the Fourth Circuit rejected Gallo's argument. Prior to the digital age, numerous costs incurred in leading up to the production of copies of materials were not taxable. Moreover, the Supreme Court has recognized that the costs awarded almost always amount to less than the prevailing litigant's total expenses, and Section 1920 is limited to relatively minor, incidental expenses. The Fourth Circuit also stated that Gallo's ESI processing charges were not taxable as "fees for exemplification" under the statute. Because Gallo's charges did not include authentication of public records or exhibits or demonstrative aids, the costs did not qualify as fees for exemplification.

Country Vintner is a reminder of the importance of conferring early in litigation about how best to limit the scope of discovery so as to prevent e-discovery costs from escalating out of control. As federal court practitioners know, parties are required to discuss issues related to the discovery of ESI during their Rule 26(f) conference. Courts are reluctant to let parties evade their discovery plan stipulations and award costs where they agreed to pay their own e-discovery expenses or did not address cost-shifting. *See, e.g., U.S. Training Ctr., Inc.*, 829 F. Supp. 2d at 336-37 (awarding only $59,384.24 out of $216,438.80 requested for "[f]ees for exemplification and costs" where the parties, in their discovery plan, "agreed to produce electronically stored information ('ESI') in this case with each party bearing their own expense of production")). However, the Fourth Circuit did note that a party may always seek a protective order to protect itself from undue burden or expense.

Should a district court deny a protective order, the movant may achieve a better result by appealing the denial of a protective order rather than hoping to rely on a costs award under 28 U.S.C. § 1920. In light of the Fourth Circuit's ruling, practitioners should also require e-discovery vendors to itemize their bills so the court can readily identify those expenses that are taxable under Section 1920 and the *Country Vintner* decision. Otherwise, a court may find the request for costs not sufficiently documented.. *See. e.g., Amdocs (Isr.) Ltd. v. Openet Telecom, Inc.*, No. 1:10cv910, 2013 U.S. Dist. LEXIS 42300, at *24 (E.D. Va. Mar. 21, 2013) (reducing requested e-discovery expenses by one-third where the vendor's invoices did not adequately identify whether the services provided were for production, copying, file conversion, or metadata extraction)). Taxable costs can be the icing on the cake at the end of a case, but *Country Vinter* reaffirms that the parties should not expect to taste a big award of e-discovery expenses regardless of how much the victor spends in baking the cake.

The Northern Virginia Chapter Hosts Annual Golf Classic

Participants enjoying themselves at the Annual Golf Classic. A good time was had by all.

The Northern Virginia Chapter held its Annual Golf Classic on April 17. Army Navy Country Club played host to this year's event, which featured over two dozen golfers competing for two prizes. The tournament was won by the team of Steve Cochran, Ed Skelly, Bill Muston, and Scott Heun all of Roeder, Cochran and Haight PLLC with an impressive score of 13 under par, 58 in the scramble format. Runner up honors were claimed by the foursome captained by Will Novak joining forces with John Prairie, Sean Joiner, and Pete Rotkis representing the law firm of Wiley Rein, LLP. Despite finishing a strong second, the team could boast about the hole in one they hit at the 155-yard Red No. 6. Despite the ace, the squad finished six strokes behind the victors.

The festivities concluded with a reception following the match at the new Army Navy Clubhouse at which the contestants enjoyed regaling one another with stories of their memorable (and occasionally forgettable) shot-making.

We are in the planning stages for the Fall Golf Tournament, which is tentatively scheduled for October 16. Please contact George Kostel at George.Kostel@nelsonmullins.com by September 15 to indicate that you are interested in playing. Final arrangements about tee times and a reception will be announced in September.

Patent Term Adjustment: It's Only A Matter of Time (Until the Federal Circuit Decides *Exelixis*)

By Matthew R. Farley*

* Matthew Farley is an associate in the Intellectual Property Litigation Practice Group of Venable's Washington DC. office

Following passage of the Leahy-Smith America Invents Act (AIA), the Eastern District of Virginia is comfortably filling its new role as a prominent venue for patent litigation. One aspect of the Rocket Docket's new role is to review decisions of the Director of the U.S. Patent and Trademark Office (PTO) concerning adjustments to patent term. 35 U.S.C. § 154(b)(4). Under the AIA, dissatisfied patentees must first petition the Director for recalculation of patent term. If the patentee remains dissatisfied, he may now seek review in the Eastern District of Virginia. Patent term adjustment appeals, like much of the Rocket Docket's new patent jurisdiction, have not been placed on rotation within the Eastern District at large, and instead are being handled solely within the Alexandria Division.

Patent term adjustment (PTA) is awarded for essentially two kinds of delay during prosecution, which are based on two sub-sections in the statute. One subsection guarantees prompt responses from the PTO (called A-delay after subsection (b)(1)(A)). Another guarantees no more than three years of patent application pendency, excluding certain delays caused by the applicant (called B-delay after subsection (b)(1)(B)). (A third kind of delay—C delay—accrues when the application is delayed due to interference or appeal with the Patent Trial and Appeal Board.)

Recently, a split developed within the Rocket Docket regarding the correct way to calculate and award B-delay. The decisions creating the split are *Exelixis, Inc. v. Kappos*, 906 F. Supp. 2d 474 (E.D. Va. 2012) (*Exelixis I*), decided by Judge Ellis in November 2012, and *Exelixis, Inc. v. Kappos*, No. 1:12-cv-00574-LMB-TRJ, 2013 WL 314754 (E.D. Va. Jan. 28, 2013) (*Exelixis II*), decided by Judge Brinkema earlier this year.

At issue in both *Exelixis* cases was whether, under the language of 35 U.S.C. § 154(b)(1)(B), an applicant is entitled to PTA for the time an application spends in continued examination when a request for continued examination (RCE) is filed after the three-year pendency date. RCEs allow applicants to continue examination of an application before the patent examiner rather than appealing to the Patent Trial and Appeal Board. Put simply, RCEs provide applicants with a "second bite at the apple," offering the opportunity to file, for example, additional substantive amendments and arguments after receiving a rejection from the examiner.

The PTO contended in both *Exelixis* cases that the statute excludes from PTA any time consumed by continued exami-nation, no matter when an RCE is filed. By contrast, Exelixis argued that the filing of an RCE after the three-year time period does not toll the accrual of B-delay, though it conceded that an RCE prior to the three-year time period would toll B-delay.

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Patent Term Adjustment
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In *Exelixis I*, Judge Ellis sided with Exelixis and held that RCEs "operate . . . to toll the three year guarantee deadline, if, and only if, they are filed within three years of the application filing date." 906 F. Supp. 2d at 482. Judge Ellis agreed with Exelixis and concluded that the language of the PTA statute is clear and unambiguous and that the USPTO's interpretation was erroneous. Applying statutory construction principles and reasoning that the statute does not treat an RCE filing as applicant delay, the district court stated that the statute's "plain language neither addresses nor requires that an applicant's PTA be reduced by the time required to process an RCE that is filed after the expiration of the three year period." *Id.* at 475. Judge Ellis further stated that "subparagraph (B) clearly provides no basis for any RCE's to reduce PTA; instead, RCE's operate only to toll the three year guarantee deadline, if, and only if, they are filed within three years of the application filing date." *Id.* at 482. Thus, Judge Ellis held that RCEs filed after the three-year deadline have no effect on PTA.

In contrast, Judge Brinkema's opinion in *Exelixis II* sides with the PTO and holds that RCEs, no matter when they are filed, serve to toll B-delay. In particular, in *Exelixis II*, Judge Brinkema found that "there is no reason to treat RCEs differently upon when they were filed" and, contrary to *Exelixis I*, found the statute ambiguous and gave "the PTO's regulation . . . *Skidmore* deference because it is a reasonable conclusion as to the proper construction of the statute." 2013 WL 314754, at *6. In *Exelixis II*, Judge Brinkema highlighted the statute's legislative history, which indicates that time consumed in continued examination "shall not be considered a delay by the USPTO," and congressional concern "about the potential for applicants to manipulate procedural devices to prolong the PTO's examination" to the applicants' advantage. *Id.* at *6-7. Under *Exelixis II*, then, time consumed by continued examination is always excludable from PTA calculation.

Exelixis I was appealed to the U.S. Court of Appeals for the Federal Circuit late last year, and *Exelixis II* was appealed on February 6, 2013. On April 19, 2013, the *Exelixis* appeals were consolidated, sub nom. *Exelixis v. Rea*, No. 13-1175. Briefing in the consolidated appeals is set to complete on July 11, 2013, and the Federal Circuit is expected to issue a decision in late 2013 or early 2014. In addition, on November 15, 2012, in *Novartis A.G. et al. v. Kappos*, 904 F. Supp. 2d 58 (D.D.C. 2012), the U.S. District Court for the District of Columbia sided with the reasoning of *Exelixis I* and issued a ruling similar to Judge Ellis's. *Novartis* was appealed to the Federal Circuit in January 2013. Argument has not been set in either appeal.

Since *Exelixis I* was decided in November, approximately 100 new PTA cases have been filed in the Eastern District of Virginia. This is likely because under prior law, patentees unsatisfied with the PTO's determination of PTA had only 180 days to appeal to federal court, measured from the date of the patent grant. The law now provides that the 180-day window is measured from the Director's recalculation decision, which must be sought prior to judicial appeal. Regarding the 100 or so post-*Exelixis* PTA cases, the judges of the Eastern District of Virginia appear to be staying the cases on consent of both parties pending a decision in the consolidated appeals.

RECENT CHAPTER EVENTS

Recent Chapter Events continued from page 3

PATENT LITIGATION CLE

On January 29, 2013, the Court's jury assembly room was packed with patent litigators, patent prosecutors, many generalists, and an esteemed panel of E.D.Va. and PTO judges. The occasion was the annual CLE entitled "Patent Litigation under the America Invents Act and Other Recent Developments." Led by moderators Chip Molster and Andrew Sommer of Winston & Strawn and Damon Wright of Venable, the panel included Chief Judge James Smith and Judge James Moore of the PTO's Patent Trial & Appeal Board, as well as U.S. District Judges Gerald Bruce Lee and Liam O'Grady and U.S. Magistrate Judges T. Rawles Jones, Jr. and John F. Anderson.

The discussion was quick-paced but comprehensive, with a focus on critical changes in PTO practice as a result of the AIA and the dramatically increased role of the EDVa Court in reviewing PTO decisions. Among the topics covered were: Discovery in PTO trial proceedings; the impact of new post-issuance PTO proceedings on patent litigation; *Kappos v. Hyatt* – as the case pertains to creating a new record in the District Court following PTO proceedings; patent term adjustment suits and the *Exelixis* cases; multi-defendant patent cases post-AIA joinder rules; continuing evolution of patent damages law; *Therasense's* impact on inequitable conduct and new supplemental examination proceedings; and willful infringement after *Bard Peripheral Vascular, Inc. v. W.L. Gore & Associates*. The moderators and panel presented these complex and cutting-edge legal issues in clear, practical and sometimes colorful fashion. With the AIA, *Kappos v. Hyatt*, and the *Exelixis* cases, the PTO's practices are also more important to Rocket Docket practitioners and the Court's caseload than ever before.

As folks visited after the CLE, many could be heard thanking Judges Smith, Moore, Lee, O'Grady, Jones and Anderson for their commitment to the legal community, their valuable thoughts and insights, and the invaluable opportunity to get up to speed on the latest rocket-fast twists and turns in patent law. The Northern Virginia Chapter of the Federal Bar Association extends its sincere thanks to the judges and also to Andrew Sommer for preparing the exceptional written materials.

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UPCOMING CHAPTER EVENTS SAVE THE DATE!

September 17, 2013
Torrey Armstrong Memorial Lecture at the Masonic Temple

October 16, 2013?? Tentative date for Fall Golf Tournament. See description on Page 6 for details.

October 28, 2013 Ethics CLE. Tom Spahn has graciously agreed to be our ethics lecturer again.

NATIONAL FBA EVENTS

Upcoming events sponsored by the National Federal Bar Association can be found at www.fedbar.org Here are some highlights:

August 20, 2013 3-5 pm
The Criminal Law Section is sponsoring an event marking the 50th Anniversary of the passage of the Criminal Justice Act of 1964 . Rare and historic materials will be on display. Library of Congress.

September 26-28, 2013
FBA Annual Meeting in San Juan, Puerto Rico

The Northern Virginia Chapter thanks Intelligent Office for providing conference rooms for our Board Meetings. A description of their services appears on Page 5.

If you are interested in contributing to the Rocket Docket News, please contact Laurie Hand at Laurie_Hand@verizon.net