EDITOR’S MESSAGE

The Maryland Intellectual Property Student Association (MIPSA) has recently undertaken the effort of publishing the Maryland IP Law Electronic Newsletter. Professor Lawrence M. Sung advises MIPSA and through his guidance this newsletter is possible. MIPSA is excited about its new initiative and welcomes article ideas as well as subscription requests. To be placed on our electronic circulation list, please send the appropriate e-mail address information to Alex Hanna at ahan001@umaryland.edu.

FEATURE ARTICLE

**PHILLIPS v. AWH CORP.: WHAT’S A WORD’S WORTH?**

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“Nearly a decade of confusion has resulted from the fiction that claim construction is a matter of law.” *Phillips v. AWH Corp.*, 376 F.3d 1382, 1384 (Fed. Cir. 2004) (Mayer, C.J., dissenting).

On July 21, 2004, the U.S. Court of Appeals for the Federal Circuit granted the petition to rehear *en banc* the case of *Phillips v. AWH Corp.*, in order to resolve several issues concerning patent claim construction. 376 F.3d 1382. The court’s decision in this case promises to be one of its most important since *Festo*. The significance of *Phillips* stems from the important role served by patent claims in defining the scope of the right of exclusivity, which is why claim interpretation is the initial step in settling disputes over ambiguous claim language. A district court’s claim construction, reviewed *de novo* under *Markman v. Westview Instruments, Inc.*, 517 U.S. 370 (1996), may be determinative of subsequent legal issues including: patentability, patent validity and infringement. In resolving these critical issues, certainty and clarity is the desired outcome for both litigants and the courts. Unfortunately, while the Federal Circuit has provided several canons of claim construction, some of them can be construed as contradictory because they allow for conflicting interpretations of claim language. Furthermore, conflicting claim interpretations can even have the support of precedent. These anomalies have led to unpredictable outcomes and a somewhat arcane state of law in an area where the public commands and deserves clearly drawn boundaries.

In *Phillips*, the claim term at issue is the word “baffles.” On April 8, 2004, the majority of a three-judge Federal Circuit panel held that the specification of U.S. Patent No. 4,677,798 (assigned to Phillips) makes clear that angled baffle panels contained in prefabricated jail construction modules are meant to deflect bullets. *Phillips v. AWH*, 363 F.3d 1207, 1213 (Fed. Cir. 2004). The majority invoked the canon of construction that the purpose of the term “baffles” was implied by the specification, which contained no explicit definition of the claim term. Consequently, the court ruled that AWH Corporation did not infringe Phillips’ patent by selling jail construction modules in which the baffle panels were at 90-degree angles and could not deflect bullets. Judge Dyk’s dissent argued that the court’s interpretation violated the competing canons of construction that limitations should not be imported from the specification into the claim and that a term’s plain meaning cannot be ignored. The analysis employed here by the Federal Circuit had been recently repeated in numerous other claim constructions with inconsistent results. Between 2003 and 2004, split claim construction decisions occurred...
fifteen other times and often involved one party accusing the other of importing a limitation into a claim term’s interpretation. Of these sixteen cases in total, various Federal Circuit panels ruled for the narrower interpretation on seven occasions and the broader one in the remaining nine disputes.

In the *Phillips* Order for an *en banc* rehearing, the Federal Circuit vacated the earlier panel decision. The decision had relied on the specification as the primary source of claim construction, which in addition to the claims and prosecution history is known as intrinsic evidence. In doing so, the decision placed less emphasis on the ordinary dictionary definition for plain meaning. In granting the rehearing, the court invited the parties, the United States Patent and Trademark Office (USPTO) and the public to submit briefs on seven issues of claim construction, which included:

1. whether the patent specification itself or dictionaries should be used as the primary reference in claim construction;
2. whether claim construction should be influenced by the sole purpose of avoiding invalidity of the patent at issue;
3. whether the prosecution history and expert testimony by one of ordinary skill in the art should play an important role in claim construction; and
4. whether it is appropriate for the Federal Circuit to accord any deference to any aspect of a trial court’s *Markman* construction hearings, while maintaining consistency with the Supreme Court’s decision in *Markman* and the *en banc* decision in *Cybor Corp. v. FAS Technologies, Inc.*, 138 F.3d 1448 (Fed. Cir. 1998).

There has been a heightened interest in *Phillips* from the general public, government entities and both bar as well as industry associations. Third parties filed a total of twenty-eight *amici* briefs. These included briefs filed on behalf of law school professors, the USPTO, the IPO, the ABA, the AIPLA, Intel and several other similar groups. The majority of briefs argue in favor of utilizing the specification and other intrinsic evidence for determining a claim’s meaning over the use of dictionaries. For example, Intel warned that the public notice function served by a claim’s meaning would suffer if dictionaries were used because dictionaries are plentiful. Similarly, both the AIPLA and the USPTO argued that dictionaries provide meanings out of context of one of ordinary skill in the art.

On February 8, 2005, the *Phillips en banc* hearing took place in front of a standing room only audience. Although the court invited commentary on a variety of broad construction issues in its rehearing Order, the bench’s questions were narrowly focused on the specific claims in dispute. However, several questions addressed the level of deference the Federal Circuit should give to district courts on claim construction matters. Carl F. Manthei, counsel for the appellant, and Mark W. Fischer, counsel for the appellee, both agreed that some deference should be accorded to the district court’s findings of fact. John M. Whealan, Solicitor and Deputy General Counsel for the USPTO also argued at the hearing and addressed other general concerns of construction. In response to Judge Dyk’s observation that the Manual of Patent Examining Procedure instructs examiners to use dictionaries, Whealan noted that examiners and applicants are persons of skill in the art who carry dictionaries in their heads. Thus, their starting point for claim construction is the patent specification itself.

Whatever the final outcome of the case may be, patent practitioners, the public and patentees are all hoping for both certainty and clarity in claim construction jurisprudence. From the point of view of someone who was actually at the *en banc* hearing, there did not
seem to be a general consensus among the bench. However, the *amici* briefs certainly indicate that clear guidance on claim construction is needed.

**THINKING IP**

**ART ACT – GOING AFTER THE “CAMERAMAN” IN THE MOVIE THEATER**

by Simon Teng – Class of ’06

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On January 25, 2005, Senator John Cornyn (R-Texas) and Dianne Feinstein (D-CA) reintroduced a bill, entitled Artists’ Rights and Theft Prevention Act (also known as the ART Act), which was previously a part of The Family Entertainment and Copyright Act of 2005 (hereinafter “FECA”). The ART Act essentially criminalizes at the federal level the audiovisual recording of movies in theaters. The Act, which was passed a total of two times in the Senate during the end of the 108th Congress, did not make it through at that time for reasons unrelated to the bill. However, on February 1, 2005 the bill received a unanimous vote in the Senate and, subsequently, on April 19 the bill passed in a vote in the House of Representatives. On April 26, 2005, the ART Act became Public Law No: 109-9.

**The Purpose and Problem**

The ART Act is aimed at fighting piracy and protecting copyright owners from those who use camcorders to record newly released movies in theaters for the purpose of distributing the unauthorized copies to third parties. Senator Orrin Hatch (R-UT), the sponsor of FECA, recognized the seriousness of this problem in the context of the Internet and the rapid development of audiovisual equipment. In many cases, the unauthorized camcorded copies are uploaded onto the Internet, where they are illegally distributed via peer-to-peer file-sharing networks. Many of the pirated hard copies sold around the world can be traced back to those very same copies, raising alarming concerns regarding copyright protection.

The ART Act defines what constitutes the offense of recording movies in a theater. Other sections of the Act also include: (1) the establishment of a preregistration system for works that are prepared for commercial distribution, and (2) the criminalization of reproducing and distributing such works.

**Defining the Offense**

The ART Act criminalizes unauthorized recordings of motion pictures in a motion picture exhibition facility. Under § 2319B(a), the offense is defined as:

“[a]ny person who, without the authorization of the copyright owner, knowingly uses or attempts to use an audiovisual recording device to transmit or make a copy of a motion picture or other audiovisual work protected under title 17, or any part thereof, from a performance of such work in a motion picture exhibition facility . . .”

The punishment for first time offenders is imprisonment for not more than 3 years, a fine, or both. As for repeat offenders, punishment may be imprisonment for no more than 6 years, a fine, or both.
Limiting the Scope of the Offense

A major concern of the Act was its broad definition of the offense. There was fear that perfectly innocent behavior that involved the use of audiovisual recording equipment could constitute an offense. For example, Senator Hatch raised a hypothetical where an individual at Best Buy or Circuit City points a camcorder at a television screen showing a movie. Would such conduct be an offense under the ART Act? The answer is no. In order for conduct to amount to an offense, the location of the recording must be in a “motion picture exhibition facility,” which is defined as:

“a movie theater, screening room, or other venue that is being used primarily for the exhibition of a copyrighted motion picture, if such exhibition is open to the public or is made to an assembled group of viewers outside of a normal circle of a family and its social acquaintances.”

Senator John Cornyn stated that Best Buy, Circuit City, or any department store would not be considered a motion picture exhibition facility since they are not primarily used for the exhibition of copyrighted motion pictures but rather the selling of electronic products. The Act would also not cover students who record films shown in class because the classroom is primarily used for educational purposes. In other words, the display of a motion picture does not automatically transform a location into a motion picture exhibition facility.

The circumstance under which a motion picture is shown rather than the nature of the venue is more likely determinative of whether that particular venue falls within the definition of the ART Act. Senator Feinstein explained that a university student who watches and records a portion of a film exhibited in the film lab would not be held liable despite the fact that the facility can be accessed by the public. The reason is the facility at that time of display is used for educational purposes, not for public exhibition of a movie.

A second major concern was the broad definition of an “audiovisual recording device.” Under the Act, it can be an offense to use equipment other than video cameras to record a motion picture. An “audiovisual recording device” is defined as:

“a digital or analog photographic or video camera, or any other technology or device capable of enabling the recording or transmission of a copyrighted motion picture or other audiovisual work, or any part thereof, regardless of whether audiovisual recording is the sole or primary purpose of the device.”

Such a broad definition was necessary in light of the ever-expanding variety of available technological gadgets with recording capabilities. Today, many consumer electronics such as palm pilots, laptops, digital cameras, and mobile phones can digitally record high quality compressed audiovisual clips that can be conveniently transferred over the Internet. Nevertheless, would the use of a hearing aid, digital camera, or a mobile phone with a recording function constitute an offense? Senator Feinstein said no. Although those devices fall under the definition of “audiovisual recording devices,” there can only be an offense if the alleged offender has the requisite intent to use the device to copy or transmit a motion picture or other audiovisual work. It would seem that the intent requirement would probably limit liability under the bill to only those who have the motive of making unauthorized recordings of substantial portions of a motion picture.
Title 17, section 101 defines “audiovisual works” as:

“works that consist of a series of related images which are intrinsically intended to be shown by the use of machines, or devices such as projectors, viewers, or electronic equipment, together with accompanying sounds, if any, regardless of the nature of the material objects, such as films or tapes, in which the works are embodied.”

It could be argued that a digital photo taken from a mobile phone or camera does not constitute an “audiovisual work” since a photo is a single image rather than multiple images that are interconnected. As for the use of a hearing aid, besides the fact that no images are transmitted, the device is used with the intent of amplifying sounds and not for copying audiovisual works.

Suppose a palm pilot or a mobile phone is used to record a video clip of a movie in a theater, would that be an offense? Does the length, quality, or substance of the video clip make a difference? A broad interpretation of the bill could indicate that video clips fall under the definition of audiovisual works. The explicit language of the bill does not differentiate between individuals who intend to record the whole movie and those who intend to record a small video clip.

**Enforcement Protection for Theaters**

A probable concern for theater owners and lessees of motion picture exhibition facilities, which was addressed by the Act, was the risk of potential lawsuits through its enforcement. Specifically, it is quite foreseeable that a patron who is falsely suspected and detained for an alleged violation would file a civil lawsuit (e.g. false imprisonment) against a theater operator and its employees. The Act rectifies this sort of potential problem by providing “immunity for theaters” if based upon “reasonable cause” an individual, suspected of violating the Act, is detained in a “reasonable manner and for a reasonable time” for questioning or seeking a law enforcement officer. Legal immunity includes both civil and criminal actions that arise from the detention of an individual. If there was no explicit protection for theaters, the threat of lawsuits would certainly provide theater owners and lessees with a strong disincentive against enforcement attempts. The scope of protection afforded covers owners or lessees of movie facilities, authorized agents, employees, the licensor of the motion picture, and agents or employees of the licensor.

**Forfeiture and Destruction**

According to § 2319B(b), if an offender is convicted, the court shall “order the forfeiture and destruction or other disposition of all unauthorized copies” and “any audiovisual recording devices or other equipment used in connection with the offense.”

**Evidence – Possession of Audiovisual Recording Equipment**

The Act makes it explicit that a person cannot be convicted solely upon his or her possession of an “audiovisual recording device” in a motion picture exhibition facility. However, such evidence can be considered in determining whether an offense has been committed.

**Victim Impact Statement**

The ART Act also offers an opportunity for victims to submit to a probation officer a “victim impact statement.” The statement is part of a presentence report, which allows a sentencing judge to factor into account the scope and severity of the economic injury suffered by the victim due to the offender’s conduct. By identifying the victims, the
holders of the intellectual property rights, and the economic injury, a sentencing judge is placed in a better position for determining the proper sentence.

Potential Legal Gap
Unfortunately, the Act does not explicitly address the aiding and abetting of unauthorized recordings of audiovisual works in a motion picture facility. The “cameraman” may have received material support from the projectionist, an undercover patron, or even a theater employee. Prosecuting all individuals potentially involved could prove to be more effective in deterring others from copying and distributing pirated movies.

A Much Needed Law…
Efforts to combat foreign piracy need not be fought solely on foreign soil. Like with all battles, attacks can be launched from home. Through its enactment, the Artists’ Rights and Theft Prevention Act should decrease what appears to be a mainstream method used by pirates for distributing bootlegged theatrical releases.

Podcasts!
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In the old days, if you wanted a large audience to read what you had written about a particular subject, you would have had to find a publisher, the larger the better. And unless you were one of those lucky enough to be given their own column in a newspaper or a magazine, you were out of luck. These days, any “ordinary Joe” with a keyboard can create his own weblog (“blog”), and if lucky, find himself with thousands of readers. The same thing may be about to happen to radio. With the huge success of Apple’s iPod, people are beginning to record their own radio shows, which others can then download and play on their iPod or other MP3 player. Unlike a large radio station, the only technology required is a computer microphone, simple software, and a web server for hosting content. It is basically the dream of anyone who’s ever wanted to own a pirate radio station.

If podcasting were to follow the development of traditional radio, two types of programming are likely to dominate the field. Disc Jockey based programs, which predominantly play music, and talk radio programs. Against the laws of intellectual property, the creators of talk radio programs should run into very little trouble. They created the show when they recorded it, and unless they are reading off someone else’s script, they own the work.

The more pertinent issue is what should happen to the producers of podcasts that incorporate copyrighted music in their shows. The most obvious analogy would be to compare the podcasters to real world radio stations, who must pay licensing fees and obtain permission from the copyright holder in order to broadcast copyrighted content. Under the current system, any individual who either broadcasts copyrighted music, performs copyrighted content live or plays copyrighted material in a public place must pay royalties and obtain permission. The major players are the movie, television and radio industries; smaller players include amusement parks, hotels and restaurants. Even Internet websites that play small background sound files are obligated to pay royalties and obtain permission because such use constitutes public performance.

Another problem comes from the fact that in television shows and movies, the music usually plays in the background audio track and the process of trying to separate the
music from the rest of the content is very difficult. For example, if one tried to record the audio content of a film directly onto a tape, one would wind up with a semi-low quality recording of the song, which includes voices of actors speaking over it. While it is possible to separate the audio tracks on a film in order to isolate the soundtrack, this type of recording requires special equipment and a certain amount of expertise.

The radio world is similar. In order for someone to transfer a song to another media, they would have to know when to hit the record button, and would have to go to much time and effort to record a full album’s worth of material. Podcasts may be entirely different. Unlike a radio broadcast, which a user cannot control, podcasts are files that users can store, fast forward or rewind. For instance, once a podcast is downloaded, it could be rewound and played repeatedly, making one less inclined to purchase the official copy of a particular favorite song. Also, there is software available that allows individuals to edit MP3 files, thus, giving users the ability to cut out a specific portion of the podcast and create a new smaller MP3 file. This would in effect give downloaders of podcasts the ability to take an hour-long podcast, which featured several different songs, and divide it into several MP3 files of individual songs. These MP3’s could then be “burned” onto a compact disc or uploaded to the Internet and traded for other files. Depending upon the popularity of such a practice, podcasters could find themselves liable under a theory of secondary liability for copyright infringement. Or, perhaps selling a podcast is simply direct copyright infringement regardless of one’s willingness to pay royalties.

All of the issues discussed raise many interesting questions. Will the performance rights organizations grant podcasters permission to use their music and allow them to pay annual licensing fees based on the number of listeners, similar to radio stations? Will a user have to pay an additional licensing fee every time he/she decides to re-listen to the podcast? Is separating an individual song from a podcast equivalent to taping a song off the radio? Should the downloading of a podcast be tantamount to downloading an individual MP3 of copyrighted material? Or, is the entire situation more similar to an individual taping a radio broadcast and re-listening to it at a later time, an activity referred to as “time shifting” and approved by the Supreme Court as fair use of copyrighted material. See Sony Corp. of America v. Universal City Studios, Inc., 464 U.S. 417 (1984).

Aside from the legal issues, collecting royalties in the world of podcasting will undoubtedly be a problem. The performance rights organizations currently calculate what percentage of royalty fees go to which artist by constantly sampling radio stations to determine how often certain songs are played. In order to keep up with podcasts, performance rights organizations would have to develop technology capable of scanning a large MP3 file and determining if it contains copyrighted material. However, if the podcast is encoded in an encrypted format, this may not be feasible. A simple solution to this problem would be to require podcasts to be unencrypted. Also, if podcasts were to gain sufficient popularity, it may be impossible to track how many podcasts are made, who makes them, how many copies of each podcast are downloaded, what songs are featured, and who is downloading them.

But all in all, the situation seems much less dire than the previous Napster crisis. Much effort is required in order to transform a podcast into individual song files; it is unlikely that listeners would be content with fast forwarding through a long audio file to find their favorite song rather than simply purchasing an individual MP3 file or compact disc.

I urge the performance rights organizations to grant podcasters permission to use copyrighted content. Traditional radio stations have become stale and repetitive, and
listeners seem eager to turn to new mediums such as MP3s and satellite radio stations. Podcasts could be the key to attracting listeners who wish to hear new content but do not wish to pay the monthly subscription fees of satellite radio. And while it might be difficult to collect royalties from individual podcasters, it is likely that several companies (e.g. PodcastAlley.com, Odeo.com, and Audible.com) will control the market and gladly aid in the development of a system of paying royalties in exchange for sharing in their profits. Also, certain programming measures could be taken to ensure that MP3s cannot be edited or replayed more than once. Such new markets could dramatically increase copyright holders’ revenues and provide a future in the face of failing radio stations.

STUDENT PERSPECTIVE

STUDY PROGRAMS FOR PREPARING FOR THE PATENT BAR EXAM
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Recently, the USPTO has implemented major changes to the Patent Agent Exam. To adequately prepare for the exam, one will likely invest in study materials. This article covers the basics one should know prior to purchasing such study materials.

After the important step of deciding to take the Patent Agent Exam, one must embark on a two-step process to ensure getting a successful study program. Such upstream time and effort is worthwhile considering that sometimes greater than 70% of Patent Agent Exam test takers do not pass.

First, and most importantly, one needs to determine how he or she has most successfully learned in the past. As a law student, obviously one has some experience with education. Likely, included in those 16 or more years are some successes and failures. Now is the time to be honest with oneself regarding the strengths and weaknesses of one’s study habits because it is likely that they will only be magnified in dealing with the dry, extremely dense material of the Patent Agent Exam.

Second, one needs to examine the prep courses available to help study for the exam. Presented below is a brief summary of the more prominent Patent Agent Exam preparation materials and their key characteristics. This list is not all-inclusive and one may likely learn about other alternatives. In choosing the proper preparatory study program, one should note that the Patent Agent Exam has gone through some drastic changes in the last few years; it now includes the upcoming transition to the Manual of Patent Examining Procedure (MPEP), Eighth Edition, Revision 2. This new version is approximately 400 pages longer than its predecessor. Given this recent change, coupled with the transition to electronic testing, talking to Fish and Neave’s Senior Partner about the Patent Agent Exam is roughly akin to asking one of the Supreme Court Justices about taking the LSAT. One might gather some helpful information, but there is probably a more recent perspective.

How to Navigate the Summary Table?
Within the table there are five courses listed. The most distinguishing feature is the availability of live instruction. Only three of the courses actually have live instruction. In deciding which of the courses that offer live instruction is best, one should definitely consider where the course is held and how often, since there is wide disparity in both frequency and location.
Every course above offers some sort of pre-recorded instruction, whether via CD, DVD, or VHS. This is a more viable alternative for those who learn better through audio/visual instruction, but do not have six days free in their schedule to attend a live course. Next, one should consider the Home Study Materials. The format of the Patent Agent Exam makes it extremely important for a study program to contain software that closely simulates both the (1) test taking format, and (2) online searching of the MPEP, since the
exam no longer allows any written materials into the test room. Beyond these characteristics, individual preference and cost are likely to be determinative factors.

Final Thoughts
The information presented here is obviously only intended to help a prospective test taker get started in deciding which program best fits. Anyone considering a Patent Agent Study Program should spend time on each of the respective program’s website, and perhaps even talk to the persons who supervise each program. Two of the programs, Patbar.com and Patent Publishing, LLC, are virtually solely run and someone is likely to take the time to answer questions.

Passing the Patent Agent Exam is a marathon, not a sprint! However, there is only one decision that is more important than the study program to use, the decision to commit over 200 hours to study. Therefore, it is wise to spend sufficient research time at the outset to choose study materials that can help make the time worthwhile. Good luck with your research and the exam.

Legal Disclaimer
Information contained in the table above is believed accurate at the time of publication. MIPSA is not responsible for any errors and omissions that the information might contain.

IP EVENTS @ MARYLAND LAW

RECENT EVENTS
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MIPSA & SHLO Event
In recent years, many policy experts have urged for alternative drug access policies given the continued threat of bio-terrorism and the rampant HIV/AIDS crisis around the world. On March 7, 2005, MIPSA and the Student Health Law Organization (SHLO) co-sponsored a forum entitled “Compulsory Licensing and Access to Medicines” to examine whether compulsory licensing of pharmaceuticals could increase access to life-saving drugs for HIV/AIDS and other diseases during times of national emergencies. The forum was also designed to magnify some of the intricacies between health and intellectual property laws. The forum featured Robert A. Freeman, Ph.D. (Senior Scholar, Department of Health Policy, Thomas Jefferson School of Medicine), Michelle S. Marks, Ph.D., J.D. (Special Counsel, Shaw Pittman, LLP; UM ’96) and Peter J. Weina, M.D., Ph.D. (Chief of Pharmacology, Walter Reed Army Institute of Research). The panel session was moderated by Professor Francis B. Palumbo, Ph.D., J.D. (Director, Center on Drugs and Public Policy, University of Maryland School of Pharmacy).

The audience engaged the panelists in a lively discussion about the need to increase access to life-saving medicines and the prospects of compulsory licensing in achieving such a goal. Dr. Marks and Dr. Freeman suggested that compulsory licensing would infringe on intellectual property rights and could stifle discoveries of innovative, life-saving drugs. Dr. Weina, an expert on tropical medicine and infectious diseases, concluded that compulsory licensing or other suggested policy alternatives cannot realize their desired outcomes until proper distribution infrastructures are established in crisis-stricken areas. MIPSA and SHLO intend to explore other proposed drug access policies in the coming semesters through similar conferences.
MIPSA would like to extend special thanks to Professor Francis Palumbo for moderating the panel discussion and Professor Lawrence Sung for his guidance.

**MIPSA & BLS Event**

On March 9, 2005, MIPSA and the Business Law Society (BLS) co-sponsored a lecture entitled “Intellectual Property Issues in Business Law: What to Look for?” The lecture featured Jeffrey C. Maynard, Esq. (UM ’99). Mr. Maynard is an Intellectual Property Associate at the Baltimore office of Whiteford, Taylor and Preston, LLP. Mr. Maynard spoke to students about the implication of intellectual property issues in day-to-day business and corporate law. Specifically, Mr. Maynard’s lecture focused on the definition and types of IP and their role in a commercial transaction setting. Mr. Maynard advised students on the need to remain keen of IP issues in practices that are not strikingly IP-related. Mr. Maynard’s insightful lecture was well received by both students and faculty.

MIPSA and BLS plan to hold similar, cross-interest lectures in the upcoming semesters.

**STAYING UPDATED**

To contact MIPSA’s officers or learn about our events, please visit our website at: [http://www.law.umaryland.edu/studentorg/mipsa/index.asp](http://www.law.umaryland.edu/studentorg/mipsa/index.asp)