

**UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE ADMINISTRATIVE LAW JUDGE
U.S. ENVIRONMENTAL PROTECTION AGENCY**

In the Matter of

Robert W. Gray, Sr.

Respondent

)
)
)
)
)
)

Proceeding No. D2017-02

FINAL ORDER

Pursuant to 37 C.F.R. § 11.27(b), the Director of the United States Patent and Trademark Office (“USPTO” or “Office”) received for review and approval from the Director of the Office of Enrollment and Discipline (“OED Director”) an Affidavit Declaring Consent to Exclusion pursuant to 37 C.F.R. § 11.27, executed by Robert W. Gray, Sr. (“Respondent”) on February 16, 2017. Respondent submitted the eight-page Affidavit Declaring Consent to Exclusion to the USPTO for the purpose of being excluded on consent pursuant to 37 C.F.R. § 11.27.

For the reasons set forth herein, Respondent’s Affidavit Declaring Consent to Exclusion shall be approved, and Respondent shall be excluded on consent from practice before the Office in patent, trademark, and other non-patent matters commencing on the date of this Final Order.

Jurisdiction

Respondent, of Sarasota, Florida, has been registered to practice before the USPTO in patent matters (Registration No. 72,248), and is subject to the USPTO Rules of Professional Conduct, 37 C.F.R. §§ 11.101 through 11.901. Pursuant to 35 U.S.C. §§ 2(b)(2)(D) and 32 and 37 C.F.R. § 11.27, the USPTO Director has the authority to approve Respondent’s Affidavit Declaring Consent to Exclusion and to exclude Respondent on consent from the practice of patent, trademark, and other non-patent matters before the Office.

Allegations of the Disciplinary Complaint

A disciplinary complaint is pending against Respondent (Proceeding No. D2017-02), which alleges that:

- a. Respondent is the president and incorporator of The Gray Law Group, Ltd. ("TGLG") originally located in and around Northwest Indiana and now located in Sarasota, Florida. In 2011, prior to becoming a registered patent attorney with the USPTO, he launched "The Independent Inventor's Program."
- b. Respondent hired a Patent Practitioner Employee newly registered to practice before the Office in patent matters.
- c. Respondent entered into an agreement with company 1, IWC, and then its successor company 2, USPC, to provide patent legal services to IWC-referred clients and later USPC-referred clients. USPC worked with inventors to help them develop, legally protect, and present their ideas to market.
- d. Respondent engaged in numerous conflicts of interest with regard to accepting USPC-referred clients. Respondent, *inter alia*, did not inform his USPC-referred clients of the fee arrangement between USPC and TGLG and the amount received from USPC to perform the client's patent legal services, nor did he gain informed consent from the USPC-referred client to accept payment from a third party for the client's patent legal services. Respondent also did not consult with the USPC-referred client to determine the type of patent protection that was appropriate for each client individually, rather he accepted USPC's direction to prepare and file a provisional patent application. Respondent did not supervise his Patent Practitioner Employee to ensure he complied with the rules governing conflicts of interest; to ensure he obtained consent to accept third party payment; and/or to ensure he counseled the client as to the client's proper patent protection.
- e. Certain USPC contracts with clients required the payment of \$125 processing fee. USPC required the payment of this fee prior to TGLG filing the client's patent application. Respondent directed his subordinate, Patent Practitioner Employee, to withhold filing of the USPC-referred clients' patent applications until USPC informed TGLG that the \$125 fees had been paid.
- f. TGLG also provided patent searches to USPC-referred clients. Respondent allowed USPC to use TGLG's implied name and imprimatur to induce the potential client to purchase USPC's patent services, ultimately providing TGLG with USPC-referred clients.

Respondent's Affidavit Declaring Consent to Exclusion

Respondent acknowledges in his February 16, 2017 Affidavit Declaring Consent to Exclusion that:

1. His consent is freely and voluntarily rendered, and he is not being subjected to coercion or duress.

2. He is aware that the disciplinary complaint filed against him (Proceeding No. D2017-02) alleges that he violated the following Disciplinary Rules of the USPTO Rules of Professional Conduct:

- a) 37 C.F.R. § 11.102(a) failing to consult with his clients, *inter alia*, as required by § 11.104, as to the means by which the objectives of the representation are to be pursued, by, *inter alia*, not independently advising the USPC-referred clients as to the appropriateness of filing a provisional patent application and, instead, adhering to USPC's instructions to prepare provisional patent applications for USPC-referred clients; by (i) failing to ensure that the \$125 fee need not be paid prior to filing; or (ii) not explaining, or having his subordinate Patent Practitioner Employee explain, to USPC-referred clients, that potential adverse consequences may arise under the patent laws (*e.g.*, the AIA's first-inventor-to-file rules) to an inventor's intellectual property rights when the filing of an otherwise ready-to-be-filed provisional patent application is withheld or delayed, thus not allowing the clients to determine when to file the application;
- b) 37 C.F.R. § 11.103 failing to act with reasonable diligence and promptness in representing a client by, *inter alia*, not filing an otherwise ready-to-be-filed provisional patent application for clients, or having his subordinate Patent Practitioner Employee do so, until receiving instructions from USPC to file the application in violation of 37 C.F.R. § 11.103 of the USPTO Rules of Professional Conduct; not filing otherwise ready-to-be-filed provisional patent applications for USPC-referred clients, or having his subordinate Patent Practitioner Employee do so, until receiving instructions from USPC to file notwithstanding whether the \$125 processing fees had been paid;
- c) 37 C.F.R. § 11.104(a)(1) failing to promptly inform the client of any decision or circumstance with respect to which the client's informed consent is required by the USPTO Rules of Professional Conduct by, *inter alia*, not informing USPC-referred clients that he was required to obtain their informed consent to be compensated by USPC for patent services rendered by TGLG on behalf of the USPC-referred clients; failing to inform Client 1 of the conflict between Respondent's interests and Client 1's interests, arising from Respondent's responsibilities to USPC as his client, and

Respondent's personal interests; not informing Client 2 that Respondent was required to obtain Client 2's informed consent to accept compensation from USPC for patent services rendered by TGLG on behalf of Client 2;

- d) 37 C.F.R. § 11.104(a)(2) failing to reasonably consult with the client about the means by which the client's objectives are to be accomplished by, *inter alia*, not explaining, or having his subordinate Patent Practitioner Employee explain, potential adverse consequences that may arise under the patent laws (e.g., AIA's first-inventor-to-file rules) to an inventor's intellectual property rights when the filing of an otherwise ready-to-be-filed provisional patent application is withheld or delayed; not explaining, or having his subordinate Patent Practitioner Employee explain, potential adverse consequences that may arise under the patent laws (e.g., AIA's first-inventor-to-file rules) to an inventor's intellectual property rights when the filing of an otherwise ready-to-be-filed provisional patent application is withheld or delayed;
- e) 37 C.F.R. § 11.104(a)(3) failing to keep the client reasonably informed about the status of the matter by, *inter alia*, not informing or having his subordinate Patent Practitioner Employee inform the clients that potential adverse consequences may arise under the patent laws (e.g., AIA's first-inventor-to-file rules) to an inventor's intellectual property rights when the filing of an otherwise ready-to-be-filed provisional patent application is withheld or delayed; failing to inform or have his subordinate Patent Practitioner Employee inform the client(s) that (i) the client's otherwise ready-to-be-filed provisional patent application was not being filed because a \$125 processing fee had not yet been paid, but need not be paid prior to filing, and (ii) the client may direct TGLG to file his/her ready-to-be filed provisional application and need not wait for USPC to inform TGLG when to file the client's provisional patent application; not informing or having his subordinate Patent Practitioner Employee inform the USPC-referred clients of the material risks and consequences that may arise under the patent laws (e.g., AIA's first-inventor-to-file rules) to an inventor's intellectual property rights when the filing of an otherwise ready-to-be-filed provisional patent application is withheld or delayed; failing to inform or have his subordinate Patent Practitioner Employee inform the USPC-referred clients that (i) the clients' otherwise ready-to-be-filed provisional patent applications were not being filed because the \$125 processing fees had not yet been paid, but need not be paid prior to filing, and (ii) the clients may have directed TGLG to file the ready-to-be filed provisional applications and need not have waited for USPC to inform TGLG when to file the clients' provisional patent applications;
- f) 37 C.F.R. § 11.104(b) failing to explain a matter to the extent reasonably necessary to permit the client to make informed decisions regarding the representation and keep the client reasonably informed about the status of the matter by, *inter alia*, not informing or having his subordinate Patent Practitioner Employee inform the USPC-referred clients of the potential material risks and consequences that may arise under the patent laws (e.g., AIA's first-inventor-to-file rules) to an inventor's intellectual property rights when the filing of an otherwise ready-to-be-filed provisional patent application is withheld or delayed; not informing the clients that the clients' otherwise

ready-to-be-filed provisional patent applications were not being filed because the \$125 processing fees had not yet been paid, but need not be paid prior to filing; and, not informing the clients that they may have directed TGLG to file the ready-to-be filed provisional applications and need not have waited for USPC to inform TGLG when to file the clients' provisional patent applications

- g) 37 C.F.R. § 11.105(a) failing to make reasonable efforts, in his capacity as a partner in a law firm, or as a person possessing comparable managerial authority in a law firm, to ensure that the firm had in effect measures giving reasonable assurance that all practitioners in the firm conformed to the USPTO Rules of Professional Conduct by, *inter alia*, not implementing effective measures to ensure that TGLG complied with disclosing to clients the portion of his \$2,600 payment to USPC that would be paid to TGLG and ensuring that TGLG complied with 37 C.F.R. §§ 11.104(a)(1), 11.105(b) and 11.108(f);
- h) 37 C.F.R. § 11.105(b) failing to communicate to the client the scope of the representation and the basis or rate of the fee and expenses for which the client will be responsible by, *inter alia*, not disclosing to USPC-referred clients the portion of their \$2,600 payment to USPC that would be paid to TGLG for referred clients' patent legal services;
- i) 37 C.F.R. § 11.107(a) representing a client where there is a significant risk that the representation of one or more clients will be materially limited by the practitioner's responsibilities to another client, a former client or a third person or by a personal interest of the practitioner by, *inter alia*, Respondent and his subordinate Patent Practitioner Employee deferring to USPC's decision that a provisional application was the appropriate intellectual property protection for the USPC-referred clients rather than independently counseling USPC-referred clients on the appropriateness of filing a provisional application (*i.e.*, counseling them with respect to the decision to file a provisional patent application) and, instead, bypassing such legal advice and simply preparing the application for the clients' review; representing clients who owed the \$125 fee when the representation involved a concurrent conflict of interest between (i) USPC's interest in collecting the \$125 processing fee prior to filing of the client's provisional patent application, and (ii) the client's interest in filing his/her otherwise ready-to-be-filed provisional application as soon as possible to maximize her intellectual property rights under the patent laws (*e.g.*, AIA's first-inventor-to-file system); (i) Respondent's representation of USPC and USPC's interest in collecting the \$125 processing fee prior to filing of USPC-referred clients' provisional patent applications, and (ii) Respondent's representation of the USPC-referred clients' interests in filing their otherwise ready-to-be-filed provisional applications as soon as possible to maximize their intellectual property rights under the patent laws (*e.g.*, AIA's first-inventor-to-file system);
- j) 37 C.F.R. § 11.107(a)(2) representing a client where there is a significant risk that the representation of one or more clients will be materially limited by the practitioner's responsibilities to another client, a former client or a third person or by a personal

interest of the practitioner by, *inter alia*, Respondent and his subordinate Patent Practitioner Employee deferring to USPC's decision that a provisional application was the appropriate intellectual property protection for the USPC-referred clients rather than independently counseling USPC-referred clients on the appropriateness of filing a provisional application (*i.e.*, counseling them with respect to the decision to file a provisional patent application) and, instead, bypassing such legal advice and simply preparing the application for the clients' review;

- k) 37 C.F.R. § 11.108(f) accepting compensation for representing a client from one other than the client without informed consent, by failing to disclose to USPC-referred clients the portion of their \$2,600 payment to USPC, a third party, that would be paid to TGLG and not obtaining the client's informed consent;
- l) 37 C.F.R. § 11.108(f)(2) accepting compensation for representing a client from one other than the client where there is interference with the practitioner's independence of professional judgment by accepting compensation from USPC and allowing USPC to direct TGLG to file a provisional patent application for the USPC-referred clients without first consulting with the clients as to the best method for protecting the clients' inventions; representing USPC-referred clients when there was a significant risk that the representation of those clients would be limited by Respondent's responsibilities to USPC, and there was a significant risk that the representation of the clients would be limited by his personal interests;
- m) 37 C.F.R. § 11.110(a) representing a client when any member of the firm with which the practitioner is associated would be prohibited from doing so by 37 C.F.R. §§ 11.107 or 11.109 by, *inter alia*, Respondent representing USPC-referred clients while also representing USPC without obtaining informed consent when those Respondent associated with in his firm, his subordinates, in particular his subordinate Patent Practitioner Employee would have been prohibited from doing so under § 11.107 (prohibiting the representation of one client if it is directly adverse to another client); representing clients when those Respondent associated with in his firm, his subordinates, such as his subordinate Patent Practitioner Employee, would have been prohibited from doing so under § 11.107(a)(2) (prohibiting representation where there is a significant risk that the representation of one client will be materially limited by the practitioner's duties to another client, or by a personal interest of the attorney);
- n) 37 C.F.R. § 11.116(a)(1) representing a client, or where representation has commenced, failing to withdraw from the representation if the representation will result in violation of the USPTO Rules of Professional Conduct or other law by representing USPC-referred clients and/or failing to withdraw from the representation thereof while also representing USPC;
- o) 37 C.F.R. § 11.201 failing to exercise independent judgment and render candid advice by, *inter alia*, Respondent and his subordinate Patent Practitioner Employee deferring to USPC's decision that a provisional application was the appropriate intellectual property protection for USPC-referred clients rather than independently counseling

USPC-referred clients on the appropriateness of filing a provisional application (*i.e.*, counseling them with respect to the decision to file a provisional patent application) and, instead, bypassing such legal advice and simply preparing the applications for the clients' review; Respondent and his subordinate Patent Practitioner Employee not filing an otherwise ready-to-be-filed provisional patent application for client(s), or having his subordinate Patent Practitioner Employee do so, until receiving instructions from USPC to file the provisional patent application; Respondent and his subordinate Patent Practitioner Employee Respondent withholding the filing of the USPC-referred clients' provisional patent applications because a \$125 fee had not yet been paid and waiting until USPC informed TGLG that the clients' provisional patent applications could be filed;

- p) 37 C.F.R. § 11.501(a) failing to make reasonable efforts to ensure that that the firm had in effect measures giving reasonable assurance that all practitioners in the firm conform to the USPTO Rules of Professional Conduct by *inter alia*, not implementing effective measures to ensure that TGLG complied with § 11.104(a)(1), § 11.105(b) and § 11.108(f) such that TGLG disclosed to USPC-referred clients the portion of their \$2,600 payment to USPC that would be paid to TGLG;
- q) 37 C.F.R. § 11.501(b) as a practitioner having direct supervisory authority over another practitioner, failing to make reasonable efforts to ensure that the other practitioner conforms to the USPTO Rules of Professional Conduct by, as a practitioner who has direct supervisory authority over his subordinate Patent Practitioner Employee, failing to make reasonable efforts to ensure that Respondent's subordinate complied with the USPTO Rules of Professional Conduct; not implementing effective measures to ensure that his subordinate employees complied with §§ 11.102(a), 11.103, 11.104(a)(2), 11.104(a)(3), 11.104(b), 11.201, and 11.504(c);
- r) 37 C.F.R. § 11.501(c) maintaining responsibility for another practitioner's violation of the USPTO Rules of Professional Conduct if: (i) the practitioner orders or, with knowledge of the specific conduct, ratifies the conduct involved, or (ii) the practitioner is a partner or has comparable managerial authority in the law firm in which the other practitioner practices, or has direct supervisory authority over the other practitioner, and knows of the conduct at a time when its consequences can be avoided or mitigated but fails to take reasonable remedial action by, *inter alia*, knowing of and ratifying (by continuing to allow the conduct) Respondent's subordinate Patent Practitioner Employee's conduct in violation of §§ 11.102(a), 11.504(c), and 11.116(a)(1); knowing of and ratifying (by continuing to allow the conduct) Respondent's subordinate Patent Practitioner Employee's failure to disclose to USPC-referred clients the portion of their \$2,600 payment to USPC that would be paid to TGLG and/or by knowing of the lack of disclosure to USPC-referred clients but not taking reasonable remedial action (*e.g.*, informing) instructing his subordinate Patent Practitioner Employee's to disclose to USPC-referred clients the portion of their \$2,600 payment to USPC that would be paid to TGLG); not implementing effective measures to ensure that TGLG complied with §§ 11.102(a), 11.103,

11.104(a)(2), 11.104(a)(3), 11.104(b), 11.201, and 11.504(c); knowing of, and/or ratified (by continuing to allow the conduct) his subordinate Patent Practitioner Employee's withholding the filing of the USPC-referred clients' provisional patent applications because the \$125 fees had not yet been paid and waiting until USPC informed TGLG that the clients' provisional patent applications could be filed, thereby violating §§ 11.102(a), 11.103, 11.104(a)(2), 11.104(a)(3), 11.104(b), 11.201, and 11.504(c);

- s) 37 C.F.R. 11.504(c) permitting a person who recommends, employs, or pays the practitioner to render legal services for another to direct or regulate the practitioner's professional judgment in rendering such legal services by, *inter alia*, Respondent and his subordinate Patent Practitioner Employee's deferring to USPC's decision that a provisional application was the appropriate intellectual property protection for USPC-referred clients rather than independently counseling USPC-referred clients on the appropriateness of filing a provisional application (*i.e.*, counseling them with respect to the decision to file a provisional patent application) and, instead, bypassing such legal advice and simply preparing the applications for the clients' review; Respondent and his subordinate Patent Practitioner Employee's deferring to, and waiting for, USPC's decision as to when to file the provisional patent applications that had been prepared for USPC-referred clients (*i.e.*, only after USPC received its \$125) without independently consulting with USPC-referred clients about the timing of the filing of their provisional applications; withholding the filing of the USPC-referred clients' provisional patent applications until a \$125 fee was paid to USPC;
- t) 37 C.F.R. § 11.505 practicing law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction, or assisting another in doing so, by *inter alia* (i) lending Respondent's firm's implied name and imprimatur, where USPC always referenced a subordinate Patent Practitioner Employee's name as patent counsel in connection with the USPC-generated patent search reports issued to USPC-referred clients that always recommended the filing of provisional patent applications; (ii) knowing that USPC always used the TGLG prior art references and patent search reports to induce the purchase of provisional patent applications; and (iii) knowing that USPC was explaining legal concepts such as provisional patent applications, non-provisional applications, and design patent applications;
- u) 37 C.F.R. § 11.804(a) violating or attempting to violate the USPTO Rules of Professional Conduct, knowingly assisting or inducing another to do so, or doing so through the acts of another in violation of 37 C.F.R. § 11.804(a) of the USPTO Rules of Professional Conduct
- v) 37 C.F.R. § 11.804(c) engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation by, *inter alia*, establishing a pattern and practice of informing USPC-referred clients that a \$125 processing fee was due prior to the filing of their provisional patent applications, and/or directing Respondent's subordinate Patent Practitioner Employee's to do so, when the \$125 was not required prior to filing, and in some instances not required to be paid by the referred clients' contract.

3. Without admitting that he violated any of the Disciplinary Rules of the USPTO Rules of Professional Conduct which are the subject of the disciplinary complaint in Proceeding No. D2017-02, Respondent acknowledges that, if and when he applies for reinstatement to practice before the USPTO in patent, trademark or other non-patent matters under 37 C.F.R. § 11.60, the OED Director will conclusively presume, for the limited purpose of determining whether to grant the application for reinstatement, that (a) the allegations regarding him in the complaint filed in Proceeding No. D2017-02 are true, and (b) he could not have successfully defended himself against such allegations.

4. He has fully read and understands 37 C.F.R. §§ 11.27, 11.58, 11.59, and 11.60, and is fully aware of the legal and factual consequences of consenting to exclusion from practice before the USPTO in patent, trademark, and other non-patent matters.

5. He consents to being excluded from practice before the USPTO in patent, trademark, and other non-patent matters.

Exclusion on Consent

Based on the foregoing, the USPTO Director has determined that Respondent's Affidavit Declaring Consent to Exclusion complies with the requirements of 37 C.F.R. § 11.27(a). Accordingly, it is hereby ORDERED that:

1. Respondent's Affidavit Declaring Consent to Exclusion shall be, and hereby is, approved;

2. Respondent shall be, and hereby is, excluded on consent from practice before the Office in patent, trademark, and other non-patent matters commencing on the date of this Final Order;

3. The OED Director shall electronically publish the Final Order at the Office of Enrollment and Discipline's electronic FOIA Reading Room, which is publicly accessible at <http://e-foia.uspto.gov/Foia/OEDReadingRoom.jsp>;

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

Notice of Exclusion on Consent

This notice concerns Robert W. Gray, Sr. of Sarasota, Florida, a patent attorney registered to practice in patent matters before the United States Patent and Trademark Office ("USPTO" or "Office"), Registration No. 72,248. The Director of the USPTO has accepted Mr. Gray's Affidavit Declaring Consent to Exclusion from practice before the Office in patent, trademark, and other non-patent matters.

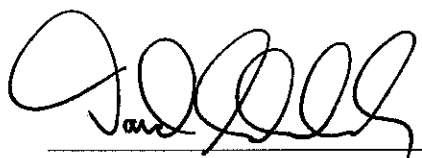
Mr. Gray voluntarily submitted his affidavit at a time when a disciplinary complaint was pending against him. The complaint alleged that Mr. Gray is the president and incorporator of the Gray Law Group, Ltd. ("TGLG"). In 2011, Mr. Gray launched the "Independent Inventor's Program." He hired a Patent Practitioner Employee newly registered to practice before the Office in patent matters. Mr. Gray entered into an agreement with company 1, IWC, and then its successor company 2, USPC, to provide patent legal services to IWC-referred clients and later USPC-referred clients. USPC worked with inventors to help them develop, legally protect, and present their ideas to market. Mr. Gray engaged in numerous conflicts of interest with regard to accepting USPC-referred clients. Respondent, *inter alia*, did not inform his USPC-referred clients of the fee arrangement between USPC and TGLG and the amount received from USPC to perform the client's patent legal services, nor did he gain informed consent from the USPC-referred client to accept payment from a third party for the client's patent legal services. Respondent also did not counsel the USPC-referred client to determine the type of patent protection that was appropriate for each client individually, rather he accepted USPC's direction to prepare and file a provisional patent application. Respondent did not supervise his Patent Practitioner Employee to ensure he complied with the rules governing conflicts of interest; to ensure he obtained consent to accept third party payment; and/or to ensure he counseled the client as to the client's proper patent protection. Certain USPC contracts with clients required the payment of \$125 processing fee. USPC required the payment of this fee prior to TGLG filing the client's patent application. Respondent directed his subordinate, Patent Practitioner Employee, to withhold filing of the USPC-referred clients' patent applications until USPC informed TGLG that he \$125 fees had been paid. TGLG also provided patent searches to USPC-

referred clients. Respondent allowed USPC to use TGLG's implied name and imprimatur to induce the potential client to purchase USPC's patent services, ultimately providing TGLG with USPC-referred clients.

While Mr. Gray did not admit to violating any of the Disciplinary Rules of the USPTO Rules of Professional Conduct as alleged in the pending disciplinary complaint, he acknowledged that, if and when he applies for reinstatement, the OED Director will conclusively presume, for the limited purpose of determining whether to grant the application for reinstatement, that (i) the allegations set forth in the OED investigation against him are true, and (ii) he could not have successfully defended himself against such allegations.

This action is taken pursuant to the provisions of 35 U.S.C. §§ 2(b)(2)(D) and 32, and 37 C.F.R. §§ 11.27 and 11.59. Disciplinary decisions involving practitioners are posted for public reading at the Office of Enrollment and Discipline Reading Room, available at: <http://e-foia.uspto.gov/Foia/OEDReadingRoom.jsp>.

5. Respondent shall comply fully with 37 C.F.R. § 11.58; and
6. Respondent shall comply fully with 37 C.F.R. § 11.60 upon any request for reinstatement.



David Shewchuk
Deputy General Counsel for General Law
United States Patent and Trademark Office

22 Feb 2017

Date

on behalf of

Michelle K. Lee
Under Secretary of Commerce for Intellectual Property and
Director of the United States Patent and Trademark Office

cc:

Director of the Office of Enrollment and Discipline
U.S. Patent and Trademark Office

Cameron K. Weiffenbach, Esq.
Miles & Stockbridge, P.C.
1751 Pinnacle Drive, Ste. 1500
McLean, VA 22102-3833
Counsel for Respondent