

**From:** Kieran Loughran  
**To:** [PTABNPR2018](#)  
**Subject:** (PTO-P-2018-0036).  
**Date:** Wednesday, June 6, 2018 2:14:27 PM

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Vice Chief Administrative Patent Judges 3 Michael Tierney or Jacqueline Wright Bonilla, PTAB Notice of Proposed Rulemaking 2018,

I am very pleased to see the USPTO adopt this recent change. It has never made sense to me that Administrative and Federal Courts would be using different measuring sticks to determine validity of patents.

Kieran.



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