

BEFORE THE BOARD OF DISCIPLINARY APPEALS  
APPOINTED BY THE  
SUPREME COURT OF TEXAS



F I L E D  
Apr 4, 2025

THE BOARD of DISCIPLINARY APPEALS  
*Appointed by the Supreme Court of Texas*

IN THE MATTER OF  
HARRISON BUCKLAND OLDHAM,  
STATE BAR CARD NO. 24077501

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CAUSE NO. 70709

**RESPONDENT HARRISON B. OLDHAM'S ANSWER TO PETITION FOR  
RECIPROCAL DISCIPLINE AND BRIEF IN RESPONSE TO ORDER TO SHOW  
CAUSE ON PETITION FOR RECIPROCAL DISCIPLINE**

Respondent Harrison Buckland Oldham ("Oldham") files his *Answer to Petition for Reciprocal Discipline and Brief in Response to Order to Show Cause on Petition for Reciprocal Discipline* and in support thereof, respectfully shows the Board of Disciplinary Appeals (the "Board") as follows:

**I.  
SUMMARY**

Respondent Harrison B. Oldham ("Oldham") requests that upon showing the applicability of one or more defenses in Texas Rule of Disciplinary Procedure 9.04, the Board issue no reciprocal discipline at all or, alternatively, to issue a private reprimand only. In any event, Oldham asks that any suspension or probation imposed run concurrently with his USPTO punishment and be carried out privately. The actions that gave rise to Oldham's discipline from the United States Patent & Trademark Office (the "USPTO") were limited in time and scope, involved a unique USPTO rule, were immediately rectified, and Oldham fully cooperated with the USPTO throughout the underlying disciplinary proceedings.

In his practice before the USPTO, Oldham personally reviewed all trademark applications he submitted to the USPTO, and he personally signed many of them. However, in some instances, after reviewing the relevant trademark filings, Oldham directed certain non-practitioner assistants to electronically enter Oldham's signature on the trademark filings, rather than entering his

signature personally. As a result, Oldham was disciplined by the USPTO for violating USPTO-specific trademark signature rules. The USPTO trademark electronic signature rules require practitioners to *personally enter the key strokes* to form the practitioner's electronic signature on documents submitted to the USPTO. In other words, a trademark attorney may not direct his paralegal or any other person to type his name onto a pleading preceded by "/s/," regardless of whether the attorney has personally reviewed the submission.

Oldham acknowledges that he violated the USPTO e-signature rules as to certain trademark filings and has fully cooperated with the USPTO in rectifying the situation and serving out his punishment related to the violation, which, as the result of an agreed settlement, included a 30-day suspension from practice before the USPTO (which began on or about June 28, 2024, and expired on or about July 28, 2024) and a 12-month probation thereafter. Oldham's suspension from the USPTO concluded in July 2024, he was reinstated to practice before the USPTO on August 5, 2024, and his probationary period concludes in July of this year.

Oldham has fulfilled and continues to fulfill his obligations to the USPTO, and he fully intends to continue fulfilling all such obligations until his probation concludes. However, , Oldham's entire practice presently consists of non-USPTO matters. Such matters include business and corporate transactional matters, business formation and organization, commercial litigation, estate planning, and probate matters. Litigation accounts for approximately 10% of Oldham's current practice, probate work accounts for approximately 15%, and the remainder of his practice consists of estate planning and transactional work.

Oldham should not be subjected to identical discipline because his violation of USPTO-specific signature rules does not constitute Professional Misconduct in Texas, which does not have an analogous "personal signature" requirement. Tex. R. Disc. P. 9.04(E). Therefore, Oldham's conduct before the USPTO warrants substantially different discipline in Texas. Tex. R. Disc. P.

9.04(D). Further, suspending Oldham from practicing law in Texas—which accounts for his entire practice for the foreseeable future—would result in grave injustice. Tex. R. Disc. P. 9.04(C). Finally, the meaning of “identical discipline” in this context should be construed as requiring only a probated suspension, which, for all of the reasons shown herein, should be imposed privately.

## **II.**

### **BACKGROUND**

#### **A. Respondent Harrison B. Oldham**

Attorney Harrison Oldham is a DFW native who received his law degree from SMU Dedman School of Law, *cum laude*, and has been practicing law in the area for over a decade. Oldham has been married to his wife, Kelsey, for 12 years, who he met at Texas A&M University while they were both undergraduate students there. The Oldham family also includes two young children, ages 7 and 2. Oldham is a member of the DFW Aggies Club, the Dallas, Texas, and American Bar Associations, the Dallas Association of Young Lawyers, and the Dallas County Chamber of Commerce Young Professionals Association. Oldham has never been subjected to professional discipline in Texas and has only had one grievance filed against him several years ago, which was dismissed by the presiding Summary Disposition Panel.

Oldham is the sole principal of his law firm, Oldham Law, PLLC, where he works alongside one associate attorney who recently graduated from SMU in 2024. As referenced above, Oldham’s practice consists primarily of state law matters, which involve a mix of commercial litigation and miscellaneous transactional matters. Although Oldham has been reinstated to practice before the USPTO, he does not currently have any open applications with the USPTO, nor is he representing any clients, trademark or otherwise, before the USPTO in any capacity. Moreover, he does not intend to renew his USPTO practice. Rather, all of Oldham’s work depends on his maintaining his Texas law license. Oldham’s reputation is of paramount importance to him

as he continues working to grow his law firm, serve his clients in the DFW community, and support his family.

## **B. The USPTO Discipline and Final Order**

### **1. The USPTO rules contain unique personal signature requirements.**

Oldham's discipline from the USPTO stems from his violation of USPTO-specific signature rules. For each piece of correspondence that requires a signature, the USPTO trademark practice rules mandate that the handwritten or electronic signature meet specific requirements. For handwritten signatures, the signature must be "personally signed in permanent ink by the person named as the signatory" and the signatory must "retain the original [signature] as evidence of authenticity." *See* 37 C.F.R. § 2.193(a)(1), (b).<sup>1</sup> For electronic signatures, which is what Oldham generally utilized in his trademark practice, the signature must be "personally entered by the person named as the signatory" (i.e., the person signing the document generally must "[p]ersonally enter any combination of letters, numbers, spaces and/or punctuation marks that the signer has adopted as a signature, placed between two forward slash ("/) symbols in the signature block of the electronic submission"). 37 C.F.R. § 2.193(a)(2), (c)(1). In other words, an attorney practicing before the USPTO may not direct his or her paralegal to electronically sign his name, even if the attorney has personally reviewed and approved the filing.

### **2. Oldham cooperated with the USPTO throughout the entirety of the year-long USPTO disciplinary process.**

On or about June 20, 2023, Oldham received from the USPTO an Initial Request for Information and Evidence ("RFI"). The RFI was issued based on the USPTO's observation, through the apparent use of geolocation, that the electronic signatures on certain applications submitted by Oldham between February 2021 and May 2023 were from locations other than

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<sup>1</sup> A copy of the USPTO signature requirements is attached hereto as Exhibit A.

Oldham's office in DFW. The USPTO sought primarily to understand who, other than Oldham, was entering the key strokes of Oldham's electronic signatures into certain electronic trademark filings, and whether Oldham was reviewing all filings submitted under his name. Oldham promptly and fully responded to the RFI, acknowledging that he occasionally directed a paralegal to sign trademark filings on his behalf. Oldham submitted to an interview by the USPTO on October 20, 2023, and the USPTO followed up with a supplemental RFI, to which Oldham responded. The USPTO proceedings took nearly a year to finalize, from the first RFI in June 2023 to the Final Order in May 2024.<sup>2</sup>

The USPTO credited Oldham with cooperating throughout the entire process, noting that, "[i]n agreeing to the disposition of the matter, the OED Director has credited Mr. Oldham's promptness, candor, and full cooperation with OED's investigation. He participated in multiple interviews with OED and provided informative, thorough, and candid responses to requests for information. He promptly acknowledged the misconduct at issue herein." Exhibit B, p. 16.

**3. The USPTO punished Oldham pursuant to an agreed settlement, and Oldham complied—and continues to comply—with the requirements thereunder.**

With Oldham's agreement, the USPTO punished Oldham with a thirty (30) day suspension from practice before the USPTO and a twelve (12) month probation thereafter. In connection with the Final Order and the USPTO disciplinary process, Oldham reviewed each of the trademark applications he filed or reviewed to determine which applications he did not personally enter his signature. That process involved reviewing nearly 1,800 USPTO filings to determine (i) if Oldham was the attorney of record for the filing, and (ii) if so, whether Oldham personally entered his name into the signature line for the filing. For cases where Oldham was the attorney of record but did

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<sup>2</sup> A true and correct copy of the Final Order entered against Oldham by the USPTO is attached hereto as Exhibit B.

not personally enter his name, Oldham provided notice to both the applicant (i.e., his client), and to the Deputy Commissioner for Trademark Examination Policy.

Oldham likewise has ongoing obligations under the Final Order. Since the beginning of Oldham's probationary period, during each calendar month, he has conducted searches of the USPTO database to search for any new USPTO applications bearing his name or credentials which were unauthorized by him. Thereafter, Oldham has emailed the USPTO at least once per month, summarizing the results of such searches. To date, Oldham has not found any offending applications or other trademark filings. Further, Oldham completed all modules of the USPTO's eight-part Trademark Basics Boot Camp. Finally, Oldham fully intends to continue fulfilling the requirements under the Final Order until his 12-month suspension expires in July of this year.

**4. Oldham has been reinstated to the USPTO and no trademark clients have complained.**

Oldham applied for reinstatement to the USPTO as soon as he was able, and was reinstated only a few days after his 30-day suspension expired.<sup>3</sup> Since that time, despite providing notice to all potentially-affected clients as outlined above, none of Oldham's trademark clients have notified Oldham of any adverse effects from Oldham's conduct. No client has filed a grievance of complaint based on Oldham's actions, and the USPTO has not notified Oldham of any additional concerns or issues. As of today, Oldham does not have any open applications with the USPTO and is not representing any clients before the USPTO in any capacity. As referenced above, Oldham's practice is now entirely focused on serving clients in Texas related to Texas state law matters.

**III.  
ANSWER**

The Petition for Reciprocal Discipline (the "Petition") in large part contains legal

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<sup>3</sup> The USPTO Decision on Petition for Reinstatement is attached hereto as Exhibit C.

averments to which no response is required. However, to the extent necessary, Oldham denies any averments that reciprocal discipline is appropriate, including the averments contained in paragraph 5 of the Petition.

#### **IV. ARGUMENTS AND AUTHORITIES**

Upon receiving information that an attorney licensed to practice law in Texas has been disciplined in another jurisdiction, the Board is generally tasked with imposing discipline “identical, to the extent practicable,” with the discipline directed by the judgment of the other jurisdiction. Tex. R. Disc. P. 9.01; 9.04. However, attorneys who are disciplined in other jurisdictions are not subject to identical discipline in Texas if they establish, *inter alia*:

- C. That the imposition by the Board of Disciplinary Appeals of discipline identical, to the extent practicable, with that imposed by the other jurisdiction would result in grave injustice;
- D. That the misconduct established in the other jurisdiction warrants substantially different discipline in this state; or
- E. That the misconduct for which the attorney was disciplined in the other jurisdiction does not constitute Professional Misconduct in this state.

Tex. R. Disc. P. 9.04(C), (D), (E).

Once the respondent attorney carries its burden of proof on one or more of the above defenses, the Board “shall enter such orders as it deems necessary and appropriate.” Tex. R. Disc. P. 9.04.

- A. The misconduct established in the USPTO warrants no discipline in Texas or, alternatively, substantially different discipline (Tex. R. Disc. P. 9.04(D), (E)).**

The conduct that gave rise to Oldham’s violation of USPTO rules—i.e., the failure to personally enter the key strokes on trademark filings submitted to the USPTO—does not constitute Professional Misconduct in Texas. The USPTO Final Order does not include a finding or conclusion that Oldham failed to review the trademark papers submitted with his electronic

signature, merely that he failed to personally affix his name to each of those papers. The undersigned counsel has been unable to locate a parallel rule under the Texas Disciplinary Rules of Professional Conduct that requires personal signing of pleadings. *See* Tex. R. Disc. P. 1.06.CC(1) (defining “Professional Misconduct,” in relevant part, as acts or omissions that violate one or more of the Texas Disciplinary Rules of Professional Conduct). Thus, because the same conduct for which Oldham was punished by the USPTO is not itself a violation of, and would not result in the violation of, any Texas Disciplinary Rule, Oldham should not be subjected to identical discipline in Texas.

Further, Oldham took full responsibility for the actions that gave rise to the USPTO discipline. Over a months-long process, Oldham identified errant trademark filings, notified clients of the potential effects to their trademark filings, and has not re-offended. Further, the universe of clients who could be negatively impacted by Oldham’s failure to follow the USPTO signature requirements consist of Oldham’s trademark clients. Because the type of conduct for which Oldham was punished would not, if followed in Texas courts, jeopardize the interests of Oldham’s Texas clients, substantially different discipline (if any) is warranted in Texas.

**B. The imposition of discipline identical, to the extent practicable, with that imposed by the USPTO would result in grave injustice (Tex. R. Disc. P. 9.04(C)).**

Oldham has readily taken responsibility for his transgressions under the USPTO rules, has diligently worked to remediate such violations, and has readily accepted the consequences of his actions. Under the circumstances presented here, issuing a public reprimand to Oldham in Texas, or imposing a suspension that requires him to notify his Texas clients thereof, would result in grave injustice. *See* Tex. R. Disc. P. 9.04(C). Oldham’s discipline before the USPTO has already been publicized, and a public reprimand in Texas would likely impede Oldham’s ability to continue growing his practice. *See Exhibit B*, p. 15 a ¶ 29.u, v. Prospective Texas clients who learn that

Oldham was disciplined in Texas likely will not understand that Oldham's discipline originated from the violation of unique USPTO rules which would be inapplicable to Oldham's representation of them in Texas courts or in transactional matters.

Further, identical discipline would be gravely unjust because Oldham's USPTO sanction solely affected Oldham's practice before a specialty court that now accounts for 0% of Oldham's practice. To impose identical discipline based on a USPTO-specific rule to Oldham's non-USPTO practice would be inequitable. Further, the USPTO sanction—both the 30-day suspension and the 12-month probation—was accompanied by extensive investigation, monitoring, and reporting requirements that would impose a significant burden on Oldham if applied in equal measure to his Texas state practice.

**C. Based on the mitigating factors discussed herein, any “identical” discipline imposed should run concurrently with Oldham's USPTO punishment, and should be kept private (Tex. R. Disc. P. 9.04).**

Should the Board determine that Oldham has not carried his burden on a defense specified in Rule 9.04, Oldham nevertheless requests that the Board consider “identical” discipline to mean punishment *concurrent* with that imposed by the USPTO.

To impose an active suspension in Texas would likely require Oldham to notify his current clients and the judges presiding over his active cases of his suspension. Further, Oldham may be required to return all client files and property, including unearned retainers, to those clients. A month's suspension of Oldham's practice, compounded with the potential loss of clients following a suspension, would make it incredibly difficult for Oldham to resume practicing, as he has spent years building his book of business.

The USPTO required Oldham to inform his *trademark* clients of his violation of *trademark* rules. Here, though strictly identical discipline might require Oldham to inform his Texas clients of his violation of those trademark rules (and the attendant discipline), it would not be practicable

or fair to require Oldham to do so, as his violation of trademark rules does not impact his representation of clients in state law transactional and litigation matters. Thus, Oldham should not be subjected to a period of active suspension in Texas, regardless of whether he can establish a defense to reciprocal discipline under Rule 9.04.

**V.**  
**PRAYER**

Following a finding that Respondent has successfully pleaded and proved at least one of the defenses listed in Texas Rule of Disciplinary Procedure 9.04, Respondent respectfully requests that the Board issue no reciprocal discipline at all or, alternatively, issue a private reprimand only. Should the Board determine that Respondent has failed to carry his burden on an applicable defense, Respondent nevertheless requests that the Board allow any suspension or probation to run concurrently with the USPTO punishment, and that any such suspension or probation be nonpublic.

Respectfully submitted,

*/s/ Roland K. Johnson*

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**ATTORNEYS FOR RESPONDENT**

### **CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of this instrument was submitted to the Office of the Chief Disciplinary Counsel via email to [filing@txboda.org](mailto:filing@txboda.org) with a copy to Richard Huntpalmer ([Richard.Huntpalmer@texasbar.com](mailto:Richard.Huntpalmer@texasbar.com)) on April 4, 2025.

*/s/ Roland K. Johnson* \_\_\_\_\_

Roland K. Johnson

# Exhibit A

Code of Federal Regulations

Title 37. Patents, Trademarks, and Copyrights

Chapter I. United States Patent and Trademark Office, Department of Commerce (Refs & Annos)

Subchapter A. General

Trademarks

Part 2. Rules of Practice in Trademark Cases (Refs & Annos)

General Information and Correspondence in Trademark Cases (Refs & Annos)

37 C.F.R. § 2.193

§ 2.193 Trademark correspondence and signature requirements.

Currentness

(a) Signature required. Each piece of correspondence that requires a signature must bear:

(1) A handwritten signature personally signed in permanent ink by the person named as the signatory, or a true copy thereof; or

(2) An electronic signature that meets the requirements of paragraph (c) of this section, personally entered by the person named as the signatory. The Office will accept an electronic signature that meets the requirements of paragraph (c) of this section on correspondence filed on paper or through TEAS or ESTTA.

(b) Copy of original signature. If a copy of an original signature is filed, the filer should retain the original as evidence of authenticity. If a question of authenticity arises, the Office may require submission of the original.

(c) Requirements for electronic signature. A person signing a document electronically must:

(1) Personally enter any combination of letters, numbers, spaces and/or punctuation marks that the signer has adopted as a signature, placed between two forward slash (“/”) symbols in the signature block on the electronic submission; or

(2) Sign the document using some other form of electronic signature specified by the Director.

(d) Signatory must be identified. The first and last name, and the title or position, of the person who signs a document in connection with a trademark application, registration, or proceeding before the Trademark Trial and Appeal Board must be set forth immediately below or adjacent to the signature.

(e) Proper person to sign. Documents filed in connection with a trademark application or registration must be signed as specified in paragraphs (e)(1) through (9) of this section:

(1) Verified statement of facts. A verified statement in support of an application for registration, amendment to an application for registration, allegation of use under § 2.76 or § 2.88, request for extension of time to file a statement of use under § 2.89, or an affidavit under section 8, 12(c), 15, or 71 of the Act must satisfy the requirements of § 2.2(n), and be signed by the owner or a person properly authorized to sign on behalf of the owner. A person who is properly authorized to verify facts on behalf of an owner is:

(i) A person with legal authority to bind the owner (e.g., a corporate officer or general partner of a partnership);

(ii) A person with firsthand knowledge of the facts and actual or implied authority to act on behalf of the owner; or

(iii) An attorney as defined in § 11.1 of this chapter who has an actual written or verbal power of attorney or an implied power of attorney from the owner.

(2) Responses, amendments to applications, requests for express abandonment, requests for reconsideration of final actions, and requests to divide. Responses to Office actions, amendments to applications, requests for express abandonment, requests for reconsideration of final actions, and requests to divide must be signed by the owner of the application or registration, someone with legal authority to bind the owner (e.g., a corporate officer or general partner of a partnership), or a practitioner qualified to practice under § 11.14 of this chapter, in accordance with the following guidelines:

(i) If the owner is represented by a practitioner qualified to practice before the Office under § 11.14 of this chapter, the practitioner must sign, except where the owner is required to sign the correspondence; or

(ii) If the owner is not represented by a practitioner qualified to practice under § 11.14 of this chapter, the individual owner or someone with legal authority to bind the owner (e.g., a corporate officer or general partner of a partnership) must sign. In the case of joint owners who are not represented by a qualified practitioner, all must sign.

(3) Powers of attorney and revocations of powers of attorney. Powers of attorney and revocations of powers of attorney must be signed by the individual applicant, registrant or party to a proceeding pending before the Office, or by someone with legal authority to bind the applicant, registrant, or party (e.g., a corporate officer or general partner of a partnership). In the case of joint applicants, registrants, or parties, all must sign. Once the applicant, registrant or party has designated a qualified practitioner(s), the named practitioner may sign an associate power of attorney appointing another qualified practitioner(s) as an additional person(s) authorized to prosecute the application or registration. If the applicant, registrant, or party revokes the original power of attorney, the revocation discharges any associate power signed by the practitioner whose power has been revoked. If the practitioner who signed an associate power withdraws, the withdrawal discharges any associate power signed by the withdrawing practitioner upon acceptance of the request for withdrawal by the Office.

(4) Petitions to revive under § 2.66. A petition to revive under § 2.66 must be signed by someone with firsthand knowledge of the facts regarding unintentional delay.

(5) Petitions to Director under § 2.146 or § 2.147 or for expungement or reexamination under § 2.91. A petition to the Director under § 2.146 or § 2.147 or for expungement or reexamination under § 2.91 must be signed by the petitioner,

someone with legal authority to bind the petitioner (e.g., a corporate officer or general partner of a partnership), or a practitioner qualified to practice under § 11.14 of this chapter, in accordance with the following guidelines:

(i) If the petitioner is represented by a practitioner qualified to practice before the Office under § 11.14 of this chapter, the practitioner must sign; or

(ii) If the petitioner is not represented by a practitioner authorized to practice before the Office under § 11.14 of this chapter, the individual petitioner or someone with legal authority to bind the petitioner (e.g., a corporate officer or general partner of a partnership) must sign. In the case of joint petitioners, all must sign.

(6) Requests for correction, amendment or surrender of registrations. A request for correction, amendment or surrender of a registration must be signed by the owner of the registration, someone with legal authority to bind the owner (e.g., a corporate officer or general partner of a partnership), or a practitioner qualified to practice before the Office under § 11.14 of this chapter. In the case of joint owners who are not represented by a qualified practitioner, all must sign.

(7) Renewal applications. A renewal application must be signed by the registrant or the registrant's representative.

(8) Designations and revocations of domestic representative. A designation or revocation of a domestic representative must be signed by the applicant or registrant, someone with legal authority to bind the applicant or registrant (e.g., a corporate officer or general partner of a partnership), or a practitioner qualified to practice under § 11.14 of this chapter. In the case of joint applicants or registrants, all must sign.

(9) Requests to change correspondence address in an application or registration. A notice of change of correspondence address in an application or registration must be signed by the applicant or registrant, someone with legal authority to bind the applicant or registrant (e.g., a corporate officer or general partner of a partnership), or a practitioner qualified to practice under § 11.14 of this chapter, in accordance with the following guidelines:

(i) If the applicant or registrant is represented by a practitioner qualified to practice before the Office under § 11.14 of this chapter, the practitioner must sign; or

(ii) If the applicant or registrant is not represented by a practitioner qualified to practice before the Office under § 11.14, the individual applicant or registrant or someone with legal authority to bind the applicant or registrant (e.g., a corporate officer or general partner of a partnership) must sign. In the case of joint applicants or joint registrants, all must sign.

(10) Cover letters. A person transmitting paper documents to the Office may sign a cover letter or transmittal letter. The Office neither requires cover letters nor questions the authority of a person who signs a communication that merely transmits paper documents.

(f) Signature as certification. The presentation to the Office (whether by signing, filing, submitting, or later advocating) of any document by any person, whether a practitioner or non-practitioner, constitutes a certification under § 11.18(b) of this chapter. Violations of § 11.18(b) of this chapter may jeopardize the validity of the application or registration, and may result in the

imposition of sanctions under § 11.18(c) of this chapter. Any practitioner violating § 11.18(b) of this chapter may also be subject to disciplinary action. See § 11.18(d) and § 11.804 of this chapter.

(g) Separate copies for separate files.

(1) Since each file must be complete in itself, a separate copy of every document filed in connection with a trademark application, registration, or inter partes proceeding must be furnished for each file to which the document pertains, even though the documents filed in multiple files may be identical.

(2) Parties should not file duplicate copies of documents in a single application, registration, or proceeding file, unless the Office requires the filing of duplicate copies.

(h) Separate documents for separate branches of the Office. Since different branches or sections of the Office may consider different matters, each distinct subject, inquiry or order must be contained in a separate document to avoid confusion and delay in answering correspondence.

(i) Certified documents required by statute. When a statute requires that a document be certified, a copy or facsimile transmission of the certification is not acceptable.

#### Credits

[73 FR 47686, Aug. 14, 2008; 74 FR 54910, Oct. 26, 2009; 80 FR 33189, June 11, 2015; 83 FR 1559, Jan. 12, 2018; 84 FR 37096, July 31, 2019; 84 FR 52364, Oct. 2, 2019; 84 FR 69330, Dec. 18, 2019; 86 FR 64333, Nov. 17, 2021]

<For policy changes effective Oct. 28, 2024 for "Post-Registration Audit Selection for Affidavits or Declarations of Use, Continued Use, or Excusable Nonuse in Trademark Cases", see 89 FR 85436.>

SOURCE: 30 FR 13193, Oct. 16, 1965; 51 FR 28057, Aug. 4, 1986; 51 FR 28709, Aug. 11, 1986; 65 FR 56793, Sept. 20, 2000; 68 FR 14337, March 25, 2003; 68 FR 48289, Aug. 13, 2003; 79 FR 74638, Dec. 16, 2014; 83 FR 33132, July 17, 2018; 85 FR 73215, Nov. 17, 2020; 86 FR 64325, Nov. 17, 2021, unless otherwise noted.

AUTHORITY: 15 U.S.C. 1113, 1123; 35 U.S.C. 2; sec. 10, Pub.L. 112–29, 125 Stat. 284; Pub.L. 116–260, 134 Stat. 1182, unless otherwise noted. Sec. 2.99 also issued under secs. 16, 17, 60 Stat. 434; 15 U.S.C. 1066, 1067.

Current through April 3, 2025, 90 FR 14586. Some sections may be more current. See credits for details.

# **Exhibit B**

**UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE DIRECTOR OF THE  
UNITED STATES PATENT AND TRADEMARK OFFICE**

In the Matter of	)	
	)	
Harrison B. Oldham,	)	Proceeding No. D2024-11
	)	
Respondent	)	
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**FINAL ORDER**

The Director of the Office of Enrollment and Discipline (“OED Director”) for the United States Patent and Trademark Office (“USPTO” or “Office”) and Mr. Harrison B. Oldham (“Respondent”) have submitted a Proposed Settlement Agreement (“Agreement”) to the Under Secretary of Commerce for Intellectual Property and Director of the United States Patent and Trademark Office (“USPTO Director”) for approval.

The Agreement, which resolves all disciplinary action by the USPTO arising from the stipulated facts set forth below, is hereby approved. This Final Order sets forth the parties’ stipulated facts, legal conclusions, and sanctions.

**Jurisdiction**

1. Respondent is an attorney who is licensed to practice law in the State of Texas, and is currently “active” and in good standing. As such, Respondent is authorized to practice before the USPTO in trademark and other non-patent matters. *See* 37 C.F.R. § 11.14(a). At all times relevant hereto, Respondent was engaged in practice before the Office in trademark matters.

2. Respondent is subject to the USPTO Rules of Professional Conduct, 37 C.F.R. § 11.101 *et. seq.*

3. The USPTO Director has jurisdiction over this matter pursuant to 35 U.S.C. §§ 2(b)(2)(D) and 32 and 37 C.F.R. §§ 11.19, 11.20, and 11.26.

### **Background**

#### **A. Relevant USPTO Trademark Rules of Practice and Trademark Regulations**

##### *The U.S. Counsel Rule*

4. Foreign-domiciled trademark applicants or registrants must be represented before the USPTO by an attorney who is licensed to practice law in the United States. *See* 37 C.F.R. § 2.11(a); *Requirement of U.S. Licensed Attorney for Foreign Trademark Applicants and Registrants*, 84 Fed. Reg. 31498 (July 2, 2019) (“the U.S. Counsel Rule”).

5. In part, the U.S. Counsel Rule was intended to (a) increase compliance with U.S. trademark law and USPTO regulations, (b) improve the accuracy of trademark submissions to the USPTO, and (c) safeguard the integrity of the U.S. trademark register. *See* 84 Fed. Reg. 31498.

##### *37 C.F.R. § 2.193 – Signature Requirements for Trademark Documents*

6. The USPTO trademark signature rules require that (a) all signatures on trademark documents be signed by a proper person, (b) trademark documents be personally signed by the signatory named on the document, and (c) a person electronically signing a document must personally enter any combination of letters, numbers, spaces, and/or punctuation marks that he or she has adopted as a signature and that combination be placed between two forward slash (“/”) symbols in the signature block on the electronic submission. *See* 37 C.F.R. §§ 2.193(a), (c), and (e); and 37 C.F.R. § 11.18(a).

7. The Trademark Manual of Examining Procedure (“TMEP”) provides additional clear and straightforward guidance to practitioners regarding the USPTO

trademark electronic signature rules' requirement that the named signatory sign the document:

All documents must be properly signed. 37 C.F.R. §§2.193(a)(1), 11.18(a).

The person(s) identified as the signatory must personally sign the printed form or personally enter his or her electronic signature, either directly on the TEAS form or in the emailed form. 37 C.F.R. §2.193(a), (d).

**Another person (e.g., paralegal, legal assistant, or secretary) may not sign or enter the name of a qualified U.S. attorney or other authorized signatory.**

Just as signing the name of another person on paper does not serve as the signature of the person whose name is written, typing the electronic signature of another person is not a valid signature by that person.

TMEP §611.01(c) (case citations omitted) (line spacing added) (bold added).

*Adverse Consequences to Applications and Issued Registrations due to Violations of USPTO Trademark Signature Rules*

8. If the signature on a trademark application or other submission fails to comply with 37 C.F.R. §2.193(a) or (e) because it was entered by someone other than the named signatory or not signed by a proper person, then the submission is improperly executed, cannot be relied upon to support registration, and normally renders the application void. *See* 84 Fed. Reg. at 31498 (stating that “[i]f signed by a person determined to be an unauthorized signatory, a resulting registration may be invalid.”). *See also In re Cowan*, 18 USPQ2d 1407, 1409 (Comm’r Pats. 1990); *In re Dermahose Inc.*, 82 USPQ2d 1793 (TTAB 2007); *In re Yusha Zhang*, 2021 TTAB LEXIS 465, \*10, \*13 (Dir. USPTO Dec. 10, 2021). When trademark filings are impermissibly signed and filed with the USPTO, the integrity of the federal trademark registration process is adversely affected.

9. Trademark applications contain declarations that are signed under penalty of perjury, with false statements being subject to punishment under 18 U.S.C. § 1001. Signatories to declarations in trademark applications make specific representations regarding the applicants' use of the mark in commerce and/or the applicants' intent to use the mark in commerce. The USPTO relies on such sworn declarations signed under penalty of perjury in trademark applications in the course of examining trademark applications and issuing registrations.

B. Certifications Required to Present Papers to the USPTO

10. A practitioner makes important certifications via 37 C.F.R. § 11.18 whenever presenting (*e.g.*, by signing, filing, submitting, or later advocating) any trademark or patent paper to the USPTO. Specifically, the practitioner certifies that all statements made on his or her own knowledge are true, and that all statements based on the practitioner's information and belief are believed to be true. *See* 37 C.F.R. § 11.18(b)(1). The practitioner also certifies that:

[t]o the best of the party's knowledge, information and belief, *formed after an inquiry reasonable under the circumstances* (i) [t]he paper is not being presented for any improper purpose, such as to harass someone or to cause unnecessary delay or needless increase in the cost of any proceeding before the Office; (ii) [t]he other legal contentions therein are warranted by existing law or by a nonfrivolous argument for the extension, modification, or reversal of existing law or the establishment of new law; (iii) [t]he allegations and other factual contentions have evidentiary support or, if specifically so identified, are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery; and (iv) [t]he denials of factual contentions are warranted on the evidence, or if specifically so identified, are reasonably based on a lack of information or belief.

37 C.F.R. § 11.18(b)(2) (emphasis added).

11. Accordingly, a practitioner who presents any paper to the USPTO—including trademark filings—certifies that he or she has conducted an inquiry reasonable under the

circumstances that supports the factual assertions set forth in the paper. *See* 37 C.F.R. § 11.18(b)(2)(iii).

12. Violations of 37 C.F.R. § 11.18 may jeopardize the probative value of the filing, and any false or fraudulent statements are subject to criminal penalty under 18 U.S.C. § 1001. *See* 37 C.F.R. § 11.18(b)(1).

13. Any practitioner who violates the provisions of 37 C.F.R. § 11.18 may also be subject to disciplinary action. *See* 37 C.F.R. § 11.18(d).

### **Joint Stipulated Facts**

14. On November 2, 2012, Respondent was admitted to practice law in the State of Texas.

15. Respondent is the sole principal of Oldham Law, PLLC, which is based in Dallas, Texas. Respondent is a solo practitioner with a staff of non-practitioner assistants.

16. Respondent has experience as a trademark attorney.

17. Around 2021, Respondent, with others, started an online company known as “Trademark Pandora.” Trademark Pandora’s aim was to offer comprehensive trademark services in the United States, European Union, and China for foreign-domiciled applicants (mostly from China), especially for individuals and companies interested in selling products on e-commerce websites. To streamline the trademark-application process, Respondent and others developed an Internet-based client portal for managing trademark applications, monitoring status, and automatically docketing deadlines. According to Respondent, Trademark Pandora also translated the USPTO Trademark Next Generation ID Manual goods and services listing into the Chinese language, enabling applicants to directly select

from the USPTO-approved Goods & Services. To the best of Respondent's knowledge, the company is no longer in operation.

18. Between January 2021 and May 2023, Respondent served as attorney of record for over 1,800 trademark applications or registrations.

19. Approximately 95 percent of Respondent's trademark clients were foreign-domiciled, who therefore required a US-licensed attorney to serve as attorney of record for their applications pursuant to the U.S. Counsel Rule.

20. Trademark Pandora's computer system would transform information inputted by prospective trademark clients into a trademark application able to be processed by the USPTO's Trademark Electronic Application System ("TEAS"). Respondent was the sole U.S.-licensed attorney responsible for reviewing, signing, and filing the application with the USPTO and for otherwise representing the applicant before the USPTO.

21. In some cases, however, Respondent directed non-practitioner assistants—including an attorney who was licensed in the country of Portugal but who was not licensed in the United States—to electronically enter Respondent's signature on trademark filings, including sworn declarations, rather than Respondent signing them personally as the named signatory, as required by USPTO rules.

22. Respondent acknowledges that his failure to abide by the USPTO's signature rules jeopardized the integrity of the trademark registry in that it led to the registration of marks that may ultimately be deemed invalid for failure to comply with the USPTO's signature requirements, and which could preclude federal registration of legitimate marks.

23. Respondent acknowledges that his failure to abide by the USPTO's signature rules jeopardized his clients' intellectual property interests in their pending trademark applications and issued registrations.

24. Respondent represents that:

- a. He has conducted an in-depth and good-faith review of all trademark documents that he has presented to the USPTO and has identified all trademark documents on which he is the named signatory but where he did not personally sign the document;
- b. He has informed the USPTO's Office of Deputy Commissioner for Trademark Policy in writing of each such trademark document; and
- c. He has provided written notification to the applicants or registrants associated with such trademark documents as to the actual or potential harm to their intellectual property rights in their pending trademark applications and/or registered trademarks caused by the presenting of such impermissibly signed trademark documents to the USPTO.

#### **Additional Considerations**

25. Respondent represents that he has never been the subject of professional discipline by the USPTO, any court, or any state bar.

26. Respondent fully cooperated with OED's investigation, to include making himself available to be interviewed by the OED staff attorneys investigating Respondent's conduct.

27. In 2024, Respondent voluntarily attended several continuing legal education ("CLE") courses pertaining to federal trademark practice and enrolled in the USPTO's *Trademark Basics Boot Camp*.

### Joint Legal Conclusions

28. Respondent acknowledges that, based on the information contained in the Joint Stipulated Facts, above, Respondent's acts and omissions violated the following provisions of the USPTO Rules of Professional Conduct in connection with his trademark practice before the USPTO:

- a. 37 C.F.R. § 11.103 (not acting with reasonable diligence and promptness in representing a client) by, *inter alia*, (i) not timely informing trademark clients of the actual or potential adverse consequences to their intellectual property rights due to the impermissible signing of trademark applications; (ii) presenting to the USPTO trademark documents, including sworn declarations, that were not signed by the named signatory or allowing other persons to do so; and (iii) not always conducting a reasonable inquiry under the circumstances as required by 37 C.F.R. § 11.18 and failing to take reasonable steps to ensure that clients' trademark filings were reviewed and filed in accordance with the USPTO trademark signature rules;
- b. 37 C.F.R. § 11.303(a)(1) and (a)(3) (candor toward the tribunal) by, *inter alia*, (i) knowingly presenting to the USPTO trademark documents, including sworn declarations, that were not signed by the named signatory; and (ii) falsely certifying under 37 C.F.R. § 11.18 that the factual assertions presented in trademark documents (*i.e.*, the named signatory signed the document being presented to the USPTO) were true when he knew that the named signatory did not sign certain trademark documents submitted to the USPTO;
- c. 37 C.F.R. § 11.503(a) and (b) (responsibilities over non-practitioner assistants) by, *inter alia*, allowing his non-practitioner assistant(s) to sign Respondent's name to trademark documents presented to the USPTO;
- d. 37 C.F.R. § 11.804(c) (engaging in conduct involving misrepresentation) by, *inter alia*, (i) presenting to the USPTO trademark documents, including sworn declarations, that were not signed by the named signatory; and (ii) allowing false certifications under 37 C.F.R. § 11.18 that the factual assertions presented in trademark document (*i.e.*, the named signatory signed the document being presented to the USPTO) were true when he knew that the named signatory did not sign certain trademark documents submitted to the USPTO; and
- e. 37 C.F.R. § 11.804(d) (engaging in conduct prejudicial to the integrity of the USPTO trademark registration system) by, *inter alia*, (i) knowingly

presenting to the USPTO trademark documents, including sworn declarations, that were not signed by the named signatory; and (ii) allowing false certifications under 37 C.F.R. § 11.18 that the factual assertions presented in trademark documents (*i.e.*, the named signatory signed the document being presented to the USPTO) were true when the named signatory did not sign certain trademark documents submitted to the USPTO.

**Agreed-Upon Sanction**

29. Respondent has freely and voluntarily agreed, and it is hereby ORDERED that:
- a. Respondent shall be suspended from practice before the Office for a period of thirty (30) days and that the suspension shall commence thirty (30) days from the date of this Final Order;
  - b. Starting on the date of this Final Order and ending 30 days from the date of this Final Order, Respondent's practice before the USPTO shall be limited to concluding work on behalf of a client on any matters pending before the Office; and, if such work cannot be concluded during that 30-day period, Respondent shall timely advise the client so that the client may make other arrangements;
  - c. Any petition for reinstatement by Respondent shall include evidence of Respondent having completed all modules of the USPTO's *Trademark Basics Boot Camp*;
  - d. Respondent is to remain suspended from practice before the USPTO until the OED Director grants a petition requesting Respondent's reinstatement pursuant to 37 C.F.R. § 11.60;
  - e. Respondent shall comply fully with all provisions of 37 C.F.R. § 11.58;

- f. Respondent shall serve a probationary period that commences 30 days after the date of this Final Order and shall terminate twelve (12) months after a decision by the OED Director granting a petition seeking Respondent's reinstatement to practice before the USPTO;
- g. Respondent may satisfy his obligations under 37 C.F.R. § 11.58(c)(3)(i) for those clients who are domiciled in a foreign country and have immediate or prospective business before the Office in trademark or other non-patent matters (*e.g.*, trademark applicants, and parties before the USPTO Trademark Trial and Appeal Board) by emailing, in the client's native language, the requisite 37 C.F.R. § 11.58 notices and information (including a copy of this Final Order that has been correctly translated into the client's native language) to:
  - 1. the email address for each client and, if applicable, the email address as set forth in the "Applicant's Information" portion of each client's trademark application, but only if such email address is an email address belonging to the client and one that Respondent reasonably believes to which the client has direct access (*i.e.*, not the email address belonging to a foreign referring entity);
  - 2. an email address belonging to the client and one that Respondent reasonably believes to which the client has direct access (*i.e.*, not the email address belonging to a foreign-domiciled third person or a foreign domiciled entity who referred the matter to Respondent); or

3. the foreign-domiciled third person or a foreign-domiciled entity who referred the matter to Respondent, but only if:
  - A. Respondent takes reasonable measures to ensure that the foreign-domiciled third person or a foreign-domiciled entity thereafter promptly forwards Respondent's email to the client with the translated Final Order attached and Respondent is copied on the forwarded email;
  - B. Respondent takes reasonable measures to learn from the foreign-domiciled third person or a foreign-domiciled entity that the client actually received Respondent's email and translated Final Order forwarded to the client; and
  - C. Respondent's affidavit submitted pursuant to 37 C.F.R. § 11.58(d) sets forth the details of his reasonable measures that are required by subparagraphs (3)(A) and (B) immediately above;
- h. During the period starting on the date of this Final Order and ending 30 days from the date of this Final Order, Respondent shall deactivate all USPTO.gov accounts that Respondent sponsored;
- i. Effective the date of the suspension, the USPTO is hereby authorized to disable or suspend any USPTO.gov accounts registered to Respondent as of the date of this Final Order (including all accounts that Respondent has ever established, sponsored, or used in connection with any trademark matter);

- j. Respondent shall not apply for a USPTO verified Electronic System account, shall not obtain a USPTO verified Electronic System account, nor shall he have his name added to a USPTO verified Electronic System account, unless and until he is reinstated to practice before the USPTO;
- k. Upon Respondent's suspension, he shall be barred from using, assessing, or assisting others in using or accessing any USPTO.gov account(s) or other USPTO filing systems for preparing or filing documents with the USPTO;
- l. Until a petition seeking Respondent's reinstatement to practice before the USPTO is granted pursuant to 37 C.F.R. § 11.60, Respondent shall be prohibited, and the USPTO is authorized to disallow Respondent, from the following: (1) opening or activating any USPTO.gov account(s) to be used for preparing or filing documents with the USPTO; (2) applying for, or attempting to apply for any USPTO.gov account(s) to be used for preparing or filing documents with the USPTO; (3) verifying, or attempting to verify, any other person's credentials in connection with USPTO.gov account(s) to be used for preparing or filing documents with the USPTO; and (4) sponsoring or attempting to sponsor USPTO.gov account(s) to be used for preparing or filing documents with the USPTO;
- m. Nothing herein shall obligate the USPTO to take action, *sua sponte*, to re-activate any USPTO.gov account disabled or suspended pursuant to this order; rather, it shall be Respondent's sole responsibility to initiate any such re-activation of any such USPTO.gov account;

- n. Respondent shall cooperate fully with the USPTO in any present or future USPTO inquiry made into any foreign associates with whom Respondent worked in connection with trademark or patent documents submitted to the USPTO.
- o. If the OED Director is of the good-faith opinion that Respondent, during Respondent's probationary period, failed to comply with any provision of the Agreement, this Final Order (including compliance with 37 C.F.R. § 11.58), or any provision of the USPTO Rules of Professional Conduct, the OED Director shall:
  - 1. issue to Respondent an Order to Show Cause why the USPTO Director should not enter an order immediately suspending the Respondent for up to an additional six (6) months for the violations set forth in the Joint Legal Conclusions, above;
  - 2. send the Order to Show Cause to Respondent at the last address of record Respondent furnished to the OED Director;
  - 3. grant Respondent fifteen (15) days to respond to the Order to Show Cause; and
  - 4. in the event that after the 15-day period for response and consideration of the response, if any, received from Respondent, the OED Director continues to be of the good-faith opinion that Respondent, during Respondent's probationary period, failed to comply with any provision

of the Agreement, this Final Order, or the USPTO Rules of Professional Conduct, the OED Director shall:

- A. deliver to the USPTO Director: (i) the Order to Show Cause; (ii) Respondent's response to the Order to Show Cause, if any; and (iii) argument and evidence supporting the OED Director's position; and
  - B. request that the USPTO Director enter an order immediately suspending Respondent for up to an additional six (6) months for the violations set forth in the Joint Legal Conclusions above;
- p. Nothing herein shall prevent the OED Director from seeking discrete discipline for any misconduct that formed the basis for an Order to Show Cause issued pursuant to the preceding subparagraph;
- q. In the event the Respondent seeks a review of any action taken pursuant to subparagraph o., above, such review shall not operate to postpone or otherwise hold in abeyance the suspension;
- r. While Respondent is on probation, Respondent shall, at least on a monthly basis, (i) search the USPTO's online trademark search system (currently located at <https://tmsearch.uspto.gov/search/search-information>) for applications identifying him as the attorney of record; and (ii) promptly inform in writing the USPTO Office of Trademark Examination Policy of each trademark document filing identifying him as the attorney of record that was made without his knowledge or consent;

- s. While Respondent is on probation, Respondent shall, at least on a bi-monthly basis, submit a written report to the OED Director stating that he has completed the monthly searches of the online trademark search system, and, as applicable, (i) stating that he identified no applications or other trademark filing in which he was named as the attorney of record that were not made by him or without his knowledge and consent; or (ii) providing copies of correspondence sent to the USPTO Office of Trademark Examination Policy as described in the preceding subparagraph;
- t. Nothing in this Final Order shall prevent the Office from considering the record of this disciplinary proceeding, including this Final Order: (1) when addressing any further complaint or evidence of similar misconduct concerning Respondent brought to the attention of the Office; and/or (2) in any future disciplinary proceeding against Respondent (i) as an aggravating factor to be taken into consideration in determining any discipline to be imposed, and/or (ii) to rebut any statement or representation by or on Respondent's behalf; and/or (3) in connection with any request for reconsideration submitted by Respondent pursuant to 37 C.F.R. § 11.60;
- u. The OED Director electronically publish this Final Order at the OED's electronic FOIA Reading Room, which is publicly accessible through the Office's website at: <https://foiadocuments.uspto.gov/oed/>;
- v. The OED Director shall publish a notice in the Official Gazette that is materially consistent with the following:

### **Notice of Suspension and Probation**

This notice concerns Mr. Harrison B. Oldham of Dallas, Texas, an attorney licensed in the State of Texas who engaged in practice before the United States Patent and Trademark Office (“USPTO”) or (“Office”). The USPTO Director has suspended Mr. Oldham from practice before the Office for a period of 30 days and placed him on probation for 12 months. This disciplinary sanction is based on Mr. Oldham having violated the following provisions of the USPTO Rules of Professional Conduct: §§ 11.103 (lack of diligence); 11.303(a)(1) and (3) (lack of candor to the tribunal—i.e., the USPTO); 11.503(a) and(b) (failure to adequately supervise non-practitioner assistants); 11.804(c) (engaging in conduct involving misrepresentation); and 11.804(d) (engaging in conduct prejudicial to the integrity of the USPTO trademark registration system).

Mr. Oldham is the sole principal of Oldham Law, PLLC. At all relevant times, Mr. Oldham operated a company called Trademark Pandora. In connection with Trademark Pandora, Mr. Oldham became the attorney of record for foreign-domiciled trademark applicants in approximately 1,800 trademark applications filed with the USPTO between January 2021 and May 2023. Mr. Oldham violated the USPTO’s ethics rules and trademark rules of practice. He impermissibly directed non-practitioner assistants—including an attorney who was licensed in the country of Portugal but who was not licensed in the United States—to sign his name to trademark documents that were then filed with the Office. Many of these documents contained sworn oaths on which the USPTO relied during *ex parte* proceedings to make factual and legal determinations regarding the applicants’ respective intellectual property rights. Such conduct violated the trademark signature rules set forth in 37 C.F.R. §2.193 and the express guidance set forth in §611.01(c) of the Trademark Manual of Examining Procedure.

In agreeing to the disposition of the matter, the OED Director has credited Mr. Oldham’s promptness, candor, and full cooperation with OED’s investigation. He participated in multiple interviews with OED and provided informative, thorough, and candid responses to requests for information. He promptly acknowledged the misconduct at issue herein.

This action is the result of a settlement agreement between Mr. Oldham and the OED Director pursuant to the provisions of 35 U.S.C. §§ 2(b)(2)(D) and 32, and 37 C.F.R. §§ 11.19, 11.20, and 11.26. Disciplinary decisions involving practitioners are posted for public reading at the Office of Enrollment and Discipline Reading Room accessible at: <https://foiadocuments.uspto.gov/oed>;

- w. Based on Respondent's agreement to do so, Respondent waives all rights to seek reconsideration of this Final Order under 37 C.F.R. § 11.56, waives the right to have this Final Order reviewed under 37 C.F.R. § 11.57, and waives the right otherwise to appeal or challenge this Final Order in any manner; and
- x. The OED Director and Respondent shall each bear their own costs incurred to date and in carrying out the terms of the Agreement and this Final Order.

Users,  
Shewchuk,  
David

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David  
Date: 2024.05.29  
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David Shewchuk  
Deputy General Counsel for General Law  
United States Patent and Trademark Office

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Date

on delegated authority by

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



# Exhibit C

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
OFFICE OF ENROLLMENT AND DISCIPLINE**

In re	:	
	:	DECISION ON PETITION
HARRISON B. OLDHAM	:	FOR REINSTATEMENT
	:	

Consideration has been given to the Petition for Reinstatement of Harrison B. Oldham received on July 24, 2024. Mr. Oldham, through counsel, has filed an Affidavit pursuant to 37 C.F.R. § 11.58 in support of the Petition. After careful review of the Petition, the supporting affidavit, and all information in the record material to his eligibility for reinstatement, the Director of the Office of Enrollment and Discipline has determined that reinstatement of Mr. Oldham to practice before the United States Patent and Trademark Office is appropriate. Accordingly, the Petition is hereby GRANTED.

/William R. Covey/

5 Aug 2024

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William R. Covey  
Deputy General Counsel for Enrollment and Discipline and  
Director of the Office of Enrollment and Discipline

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Date