



After Int'l Seaway, Curver and SurgiSil: What is the Scope of a Design Patent?



Chris Carani & Rich Stockton





Topics

- Does the sole test for anticipation have to be the ordinary observer test, as Int'l Seaway concluded?
- How has Int'l Seaway been applied in subsequent cases
- •What issues are next?
- Discussion and requirements of this title

Was *Int'l Seaway's*Holding Compelled?





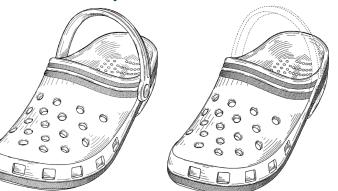
International Seaway v. Walgreens 589 F.3d 1233 (Fed. Cir. 2009)

"In light of [1] Supreme Court precedent ...

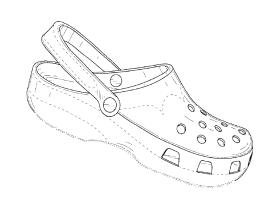
[2] our precedent ... that the same tests must be applied to infringement and anticipation, and

[3] our holding in *Egyptian Goddess* that the ordinary observer test is the sole test for infringement, ...

the ordinary observer test must logically be the sole test for anticipation as well."

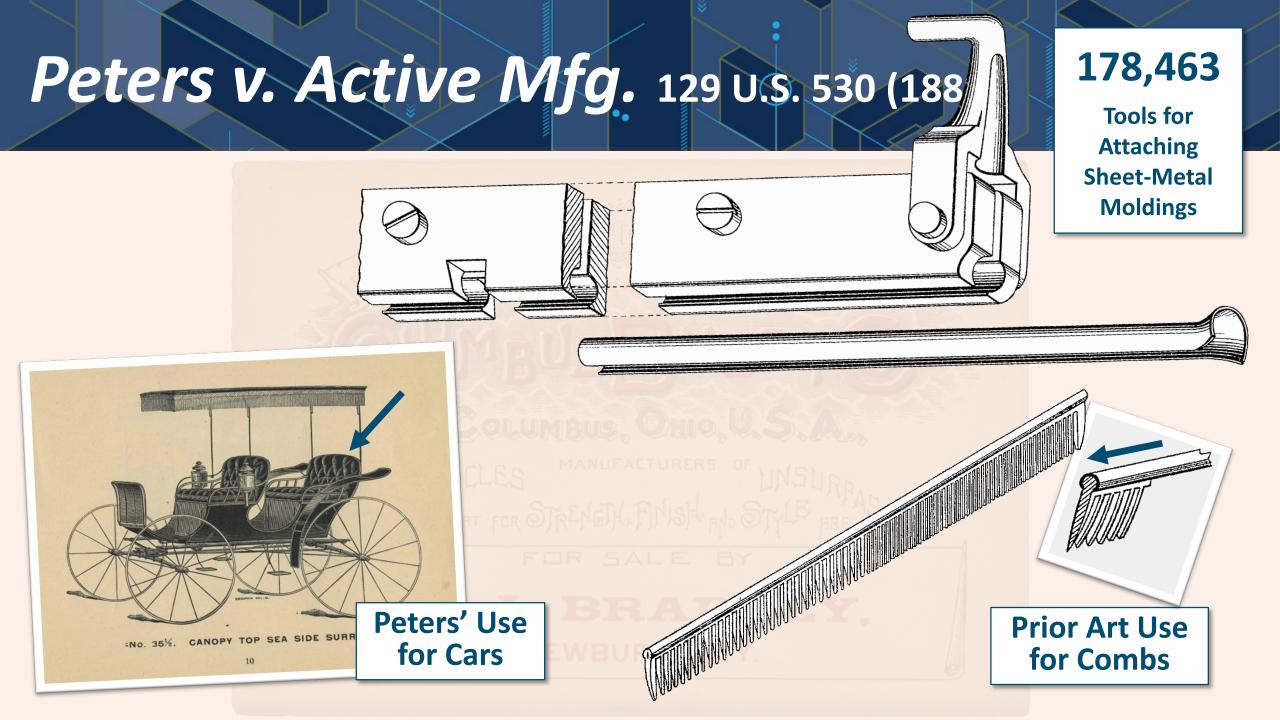






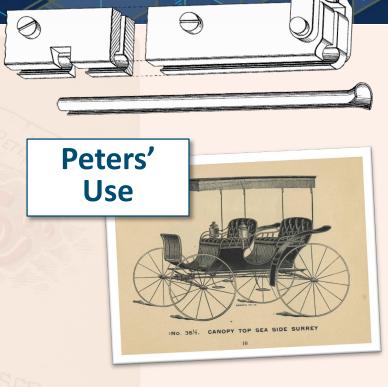
International Seaway v. Walgreens 589 F.3d 1233 (Fed. Cir. 2009)

That which intringes, if later, would antituding. If Patiliet. "
e ordinary observer test must logically he the sole test for anticipation as Peters v. Active Mfg., 129 U.S. 530 (1889)



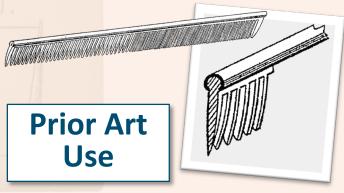
Peters v. Active Mfg. 129 U.S. 530 (1889)

Dictum? Despite use of the word "anticipation," Peters is about "inventiveness" (i.e., proto-103), not novelty!



178,463

Tools for Attaching Sheet-Metal Moldings



International Seaway v. Walgreens 589 F.3d 1233 (Fed. Cir. 2009)

"In light of [2] our precedent ... that the same tests must be applied to infringement and anticipation...

• Bernhardt v. Collezione Europa

386 F.3d 1371, 1378

Door-Master v. Yorktowne

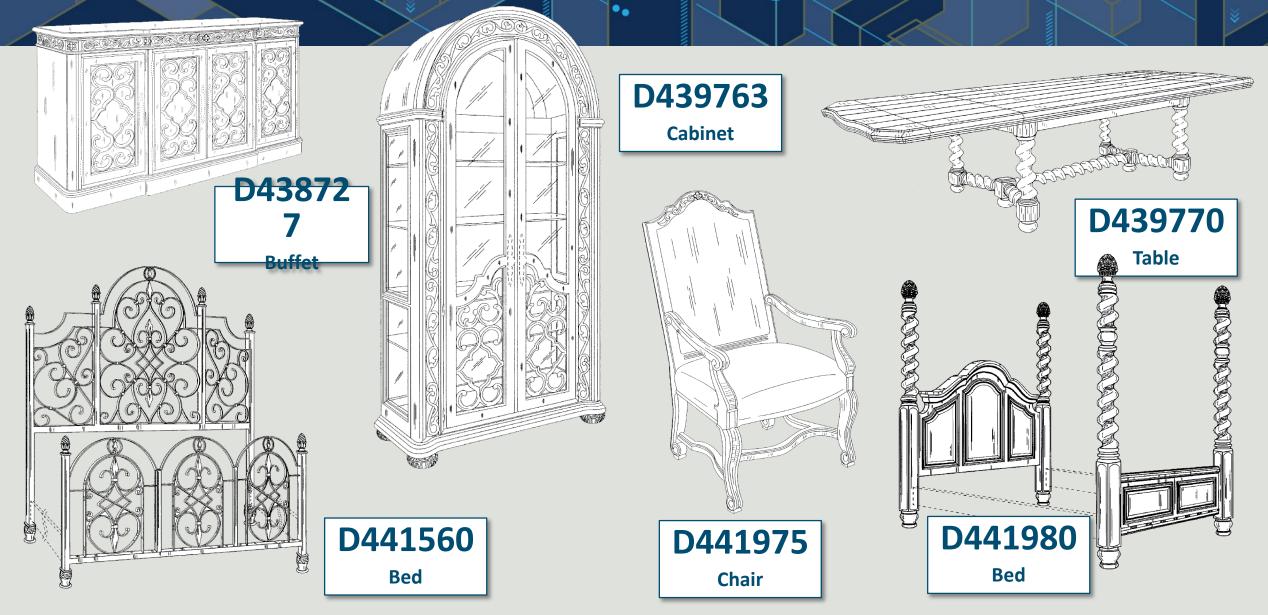
256 F.3d 1308, 1312

Litton v. Honeywell

728 F.2d 1423, 1440

...the ordinary observer test must logically be the sole test for anticipation as well."

Bernhardt v. Collezione Europa 386 F.3d 1371 (Fed. Cir. 2004)

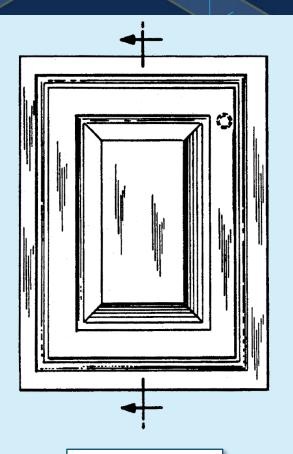


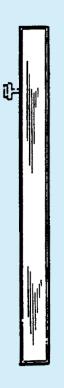
Bernhardt v. Collezione Europa 386 F.3d 1371 (Fed. Cir. 2004)

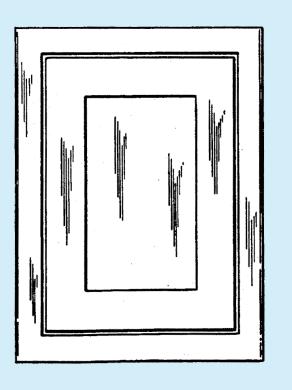
"The test for determining invalidity is the same. Thus, to invalidate a design patent based on a prior public use under 35 U.S.C. § 102(b), the fact finder must compare the claim and the prior public use, employing both the ordinary observer and point of novelty tests."

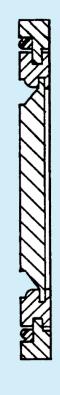


Door-Master v. Yorktowne 256 F.3d 1308 (Fed. Cir. 2001)









D338,718

Integrated Door and Frame (Front View) D338,718
Integrated Door and Frame
(Side View)

D338,718

Integrated Door and Frame

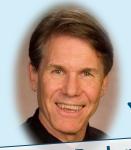
(Rear View)

D338,718

Integrated Door and Frame

(X-Sec. View)

Door-Master v. Yorktowne 256 F.3d 1308 (Fed. Cir. 2001)



Judge Rader



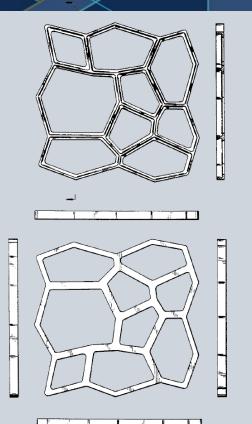
Judge Gajarsa

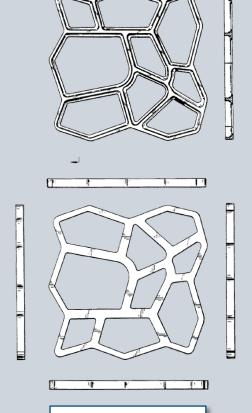


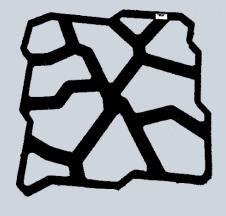
"As with a utility patent, design patent anticipation requires a showing that a single prior art reference is "identical in all material Because" "[t]hat which infringes, if later, would anticipate, if earlier," Peters v. Active Mfg. Co., 129 U.S. 530, 537 (1889), the design patent infringement test also applies to design patent anticipation."

Hupp v. Siroflex 122 F.3d 1456 (Fed. Cir. 1997)



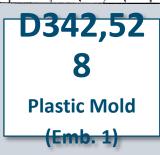






News Ad

Alleged Prior Art



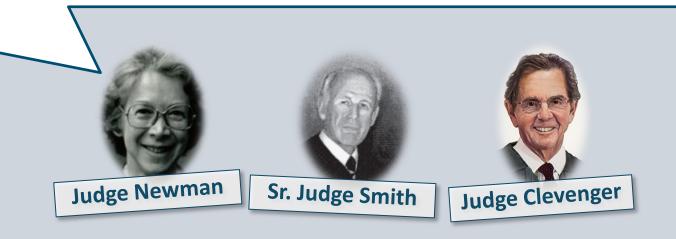
D342,528
Plastic Mold
(Emb. 2)

Siroflex

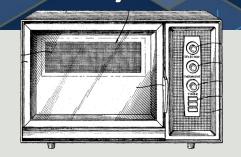
Accused Mold

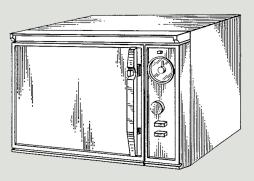
Hupp v. Siroflex 122 F.3d 1456 (Fed. Cir. 1997)

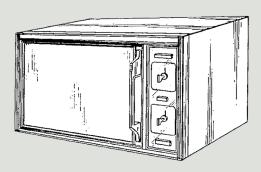
For design patent invalidity under § 102(a), "the factual inquiry is the same as [for] a utility patent; see 35 U.S.C. § 171. The publication must show the same subject matter as that of the patent, and must be identical in all material respects."

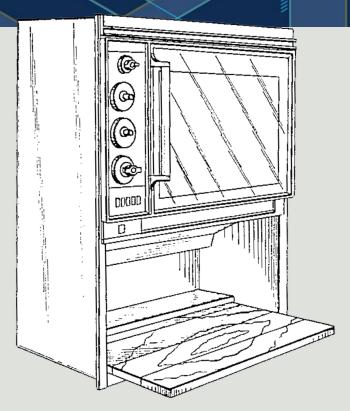


Litton Systems v. Whirlpool 728 F.2d 1423 (Fed. Cir. 1984)

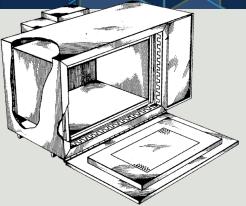


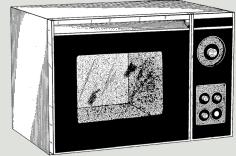


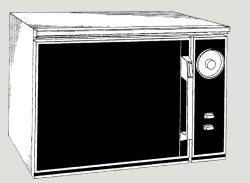




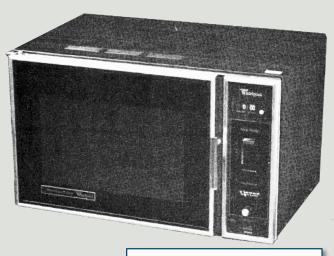












Accused Product
Whirlpool 7600

Litton Systems v. Whirlpool 728 F.2d 1423 (Fed. Cir.

1984)

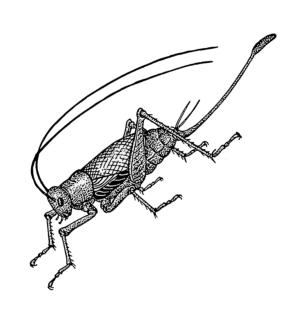


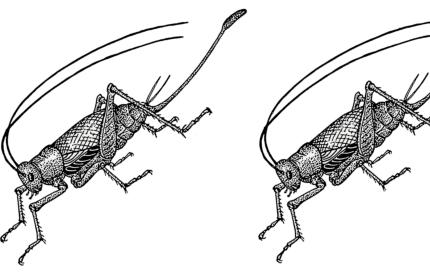
Sr. Judge Nichols

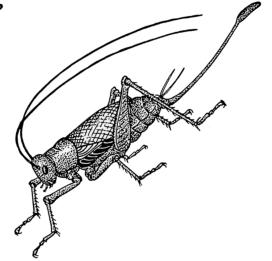


Judge Kashiwa









"The provisions of this title relating to patents for inventions shall apply to patents for designs, except as otherwise provided."

International Seaway v. Walgreens 589 F.3d 1233 (Fed. Cir. 2009)

"In light of [3] our holding in Egyptian Goddess that the ordinary observer test is the sole test for infringement, ...

More on the 00 Test Later...

...the ordinary observer test must logically be the sole test for anticipation as well."

Where We're At...



How Has *Int'l Seaway*Been Applied?





How Has Int'l Seaway Been Applied?

• Curver Luxembourg v. Home Expressions

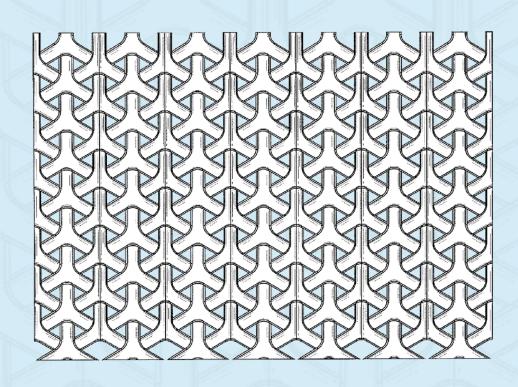
938 F.3d 1334 (Fed. Cir. 2019)

•In re SurgiSil

14 F.4th 1380 (Fed. Cir. 2021)

Columbia v. Seirus

Curver Luxembourg v. Home Expressions 938 F.3d 1334 (Fed. Cir. 2019)



D677946

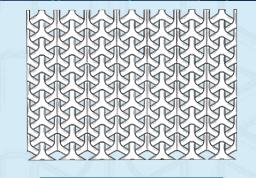
Pattern for a Chair



Accused Product

Curver Luxembourg v. Home Expressions 938 F.3d 1334 (Fed. Cir. 2019)

"...[W]e hold that claim language can limit the scope of a design patent where the claim language supplies the only instance of an article of manufacture that appears nowhere in the figures."



D677946

Pattern for a Chair



Accused Product







In re SurgiSil 14 F.4th 1380 (Fed. Cir. 2021)

II PEDERAL REPORTER, SA SERIES.



IN REC SCHOOLS, L.L.F., Print Replant, from Starts,

Underliftsion Coart of Appeals, Euleral Circuit.

Decided: October 4, 2923

Salgrent Apricut might roles of Socialest of Palent Titul and Appeal Source opplication for ununuous design for a Sp.

Chief Judge, bold that palent design claim for "its imples" was instead to by its plants and the sale over other pricins of manufacture, including set less that was subject of province discharges,

work of the beauty of the Court. Trug and Appeal Smart's O'TASS Input need Clares Inc. Titl. No. 2016 1. marketing & san.

fice, Alexandria, VA, argued for appellee

Patent design claim for "lip implant" Andrew Hirsfeld. Also represented by was limited to lip implants and did not. cover other articles of manufacture, includ-ing art tool that was subject of previous eed.

NEWMAN and O'MALLEY, Circuit Patents ⇔2053 A design claim under the Patent Act Judges.

is limited to the article of manufacture identified in the claim; it does not broadly MOORE, Chief Judge. cover a design in the abstract. 25 SurgiSil appeals a decision of the Patent

Appeal from the United States Patent and Appeal Roard affirming an exAppeal from the United States Patent and Trademark Office, Patent Trial and Arguell Busin No. 2010. 100.

Appeal Busin No. 2010. 100.

Appeal Busin No. 2010. 100. Appeal Board in No. 20491,500.

une moard errod in holding that the damed obegin is not instead to the particular article of magnificant intended in the particular article of magnificant identified in the Calmin, we recome Appeal Board in No. 29/491,550.

Washington, DC, argued for appellants SurgiSil, L.L.P., Peter Raphael, Scott Har-

Trial and Appeal Board affirming an ex-

Before MOORE, Chief Judge,

SurgiSil, I.I.P., Peter Rapman, Scott Har-ris. Also represented by John Russell Em-erson, Alan N. Herda, Debra Janece The 550 application claims an "ornaerson, Aian N. Horus, Deura Sansos The 260 application Canada at McComas, Vera L. Suarez, Dallas, TX. mental design for a lip implant as shown Mary L. Kelly, Office of the Solicitor, and described." J.A. 19. The application's United States Patent and Trademark Of-



J.A. 182. Blick's stump is made of "tightly 2.A. 20. thicks stump is made of "tightly The examiner rejected the sole claim of the '500 application as articipated by a "tight study, of the property of the property of the Dick Block endouge (Block). See Block disclosus are to look called a stump.

differences in shape between the claimed in the claim language." J.A. 7. It further design and Blick are minor. J.A. 2-5. It explained that "whether a reference is design and Block are minor. J.A. 2-0. It rejected SurgiSil's argument that Blick analogous art is irrelevant to whether that could not anticipate because it disclosed a reference anticipates." Id. (quoting In re "very different" article of manufacture Schreiber, 128 F.3d 1473, 1478 (Fed. Cir.

The Board affirmed, finding that the

14 FEDERAL REPORTER, 4th SERIES

tion under 28 U.S.C. § 1295(a)(4)(A).

identified in the claim is not limiting was a logal concussion. We review the Board's

J.A. 7. As such, the claim is limited to lip

logal concussions do novo. Realtine Detec
implants and does not cover other articles

of possible properties. angual conclusions on novo. Reditine Detec-tion LLC v. Star Envirotech, Inc., 811 Fig. 4.05. And Clad. Cla. Only Section Description of the Rich disabone on and local method than the connon, LLC v. Star Envirodeck, Inc., S11

§ 244 455, 440 (Fed. Cir. 2015) (citing Rambus Inc. v. Ren, 731 F 34 1248, 1251 (Fed. bus Inc. v. Rea, 731 F.3d 1248, 1251 (Fed. Cir. 2013)). We hold that the Board erred sa matter of law. as a matter of law.

article of manufacture identified in the claim; it does not broadly cover a design in [3] A design claim is limited to the the abstract. The Patent Act permits the grant of a design patent only to "(w]hoever Director's position. Because the Board invents any new, original and ornamental erred in holding that the claimed design is design for an article of manufacture," 35 not limited to lip implants, we reverse. U.S.C. § 171(a) (emphasis added). In Gorham Co. v. White, 81 U.S. 14 Wall. 511, 20 L.Ed. 731 (1871), the Supreme Court explained that "[t]he acts of Congress which authorize the grant of patents for designs" contemplate "not an abstract impression, or picture, but an aspect given to those objects mentioned in the acts." Id. at 524-25 (emphasis added). Accordingly, in Curver Luxembourg, SARL v. Home Expressions Inc., 938 F.3d 1334, 1336 (Fed. Cir. 2019), we held that the claim at issue was limited to the particular article of manufacture identified in the claim, i.e., a chair. Consistent with this authority, the Patent Office's examination guidelines state that a

1997)). SurgiSil appeals. We have jurisdic- "[d]esign is inseparable from the article to which it is applied and cannot exist alone " Manual of Patent Examining Proce-

Here, the claim identifies a lip implant. by a question of fact, the Beard's predicate decision that the article of manufacture J.A. 7. As such, the claim is limited to lip

Costs to SurgiSil.



29/491550 "Lip Implant" **Prior Art Art Tool**

In re SurgiSil 14 F.4th 1380 (Fed. Cir. 2021)

"A design claim is limited to the article of manufacture identified in the claim"

Thus, lip implant not anticipated by art tool







29/491550 "Lip Implant"

Prior Art Art Tool



In re SurgiSil 14 F.4th 1380 (Fed. Cir. 2021)

29/491550 "Lip Implant"

In Curver, "we held that the claim at issue was limited to the particular article of manufacture identified in the claim, i.e., a chair." ... where the claim language supplies the only instance of an article of manufacture that appears nowhere in the figures."



AND EFFECTIVELY FOR INFRINGEMENT)

Judge Moore

Art Tool

Prior Art

Columbia v. Seirus cv-21-2299 (Briefed, Await Fed. Cir. Oral Arg. Sched.)

D657093

HRM: "legwear"

D657093

HRM: "Sleeping Bag"

D657093

Title: Heat Reflective Material

D657093

HRM "as used in handwear"

D657093

HRM: "footwear"

D657093

HRM: "footwear"

D657093

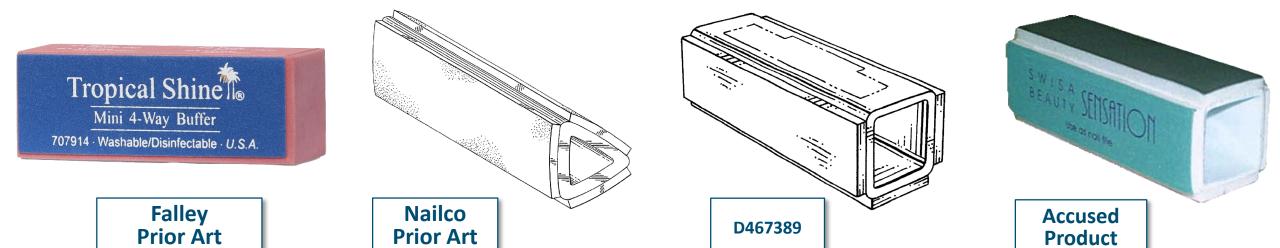
HRM: "sock"

D657093

HRM: "outerwear'

"[W]hen the claimed and accused designs are not plainly dissimilar, resolution of the question whether the ordinary observer would consider the two designs to be substantially the same will benefit from a comparison of the claimed and accused designs with the prior art"

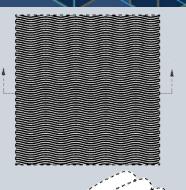
Egyptian Goddess v. Swisa 543 F.3d 665 (Fed. Cir. 2008) (en banc)



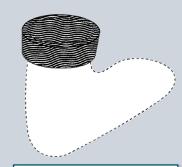
- Difference: pads on 3 vs. 4 sides
- Evidence showed the difference mattered
- No showing why accused product was "closer" than Nailco prior art
- Lots of prior art showing, e.g., square blocks with pads on 3 or 4 sides
- Accordingly, SJ of noninfringement affirmed

Columbia V. Seirus CV-21-2299 (Briefed, Await Fed. Cir. Oral Arg. Sched.)

T.B.D.













Accused Product









Judge

Judge

What's Next: Identical Designs, Different Products





What's Next: Identical Designs, Different Products

- The Conversation We Never Had...
- Design Equilibrium and Imbalance
- AOM Agnostic vs. AOM Specific
- Comparison Prior Art Scope design for an article of
- Ordinary Observer vs. PHOSITA?
- Like-Kind vs. Analogous Prior Art en therefor, subject
- Discussion tions and requirements of this title

Drinking Cup

Patent Design



Title: Drinking Cup

Claim: Drinking Cup



Cup vs. Cap?

Patent Design



Title: Drinking Cup Claim: Drinking Cup





Infringement?







Cap for Shaving Cream

Cap vs. Cup?

Prior Art







Patent Design





Title: Drinking Cup Claim: Drinking Cup



"It is well settled that a design patent may be infringed by articles which are specifically different from that shown in the patent, Gorham Co. v. White, 81 U.S. 511, and it has been repeatedly held that a patent will be refused on an application claiming a design which is not patently different from, or involves the same inventive concept as, a design claimed in a patent granted to the same inventor, even on a copending application.. It seems evident, therefore, that the inventive concept of a design is not limited to the exact article which happens to be selected for illustration in an application or patent."

In re Rubinfield, 270 F.2d 391, 450 (C.C.P.A. 1959)

"It is true that the use to which an article is to be put has no bearing on its patentability as a design and that if the prior art discloses any article of substantially the same appearance as that of an applicant, it is immaterial what the use of such article is. Accordingly, so far as anticipation by a single prior art disclosure is concerned, there can be no question as to nonanalogous art in design cases.

In re Glavas, 230 F.2d 447, 450 (C.C.P.A. 1956)



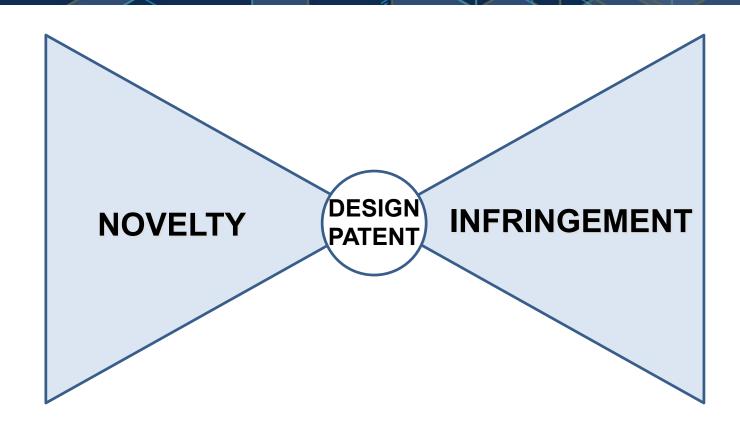
First Principles 35 U.S.C. § 289

"Whoever during the term of a patent for a design, without license of the owner, (1) applies the patented design, or any colorable imitation thereof, to any article of manufacture for the purpose of sale, or (2) sells or exposes for sale any article of manufacture to which such design or colorable imitation has been applied shall be liable to the owner to the extent of his total profit, but not less than \$250, recoverable in any United States district court having jurisdiction of the parties."





Design Patent Scope Equilibrium

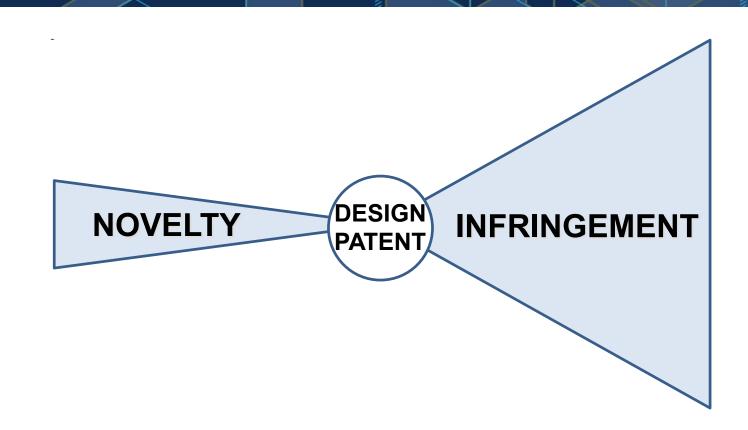


AOM-Agnostic (broad scope)





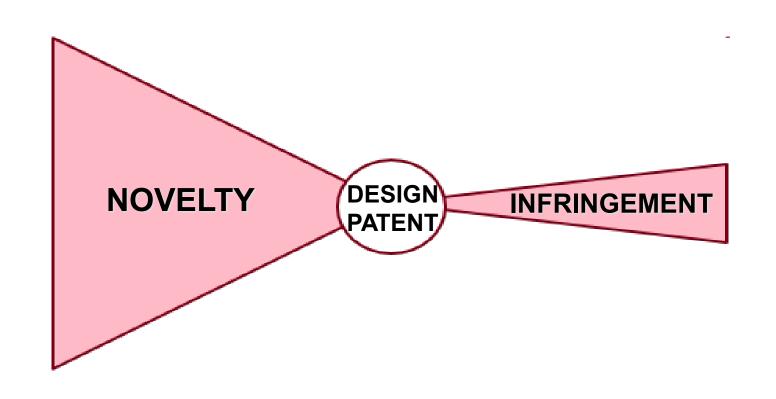
Design Patent Scope Imbalance







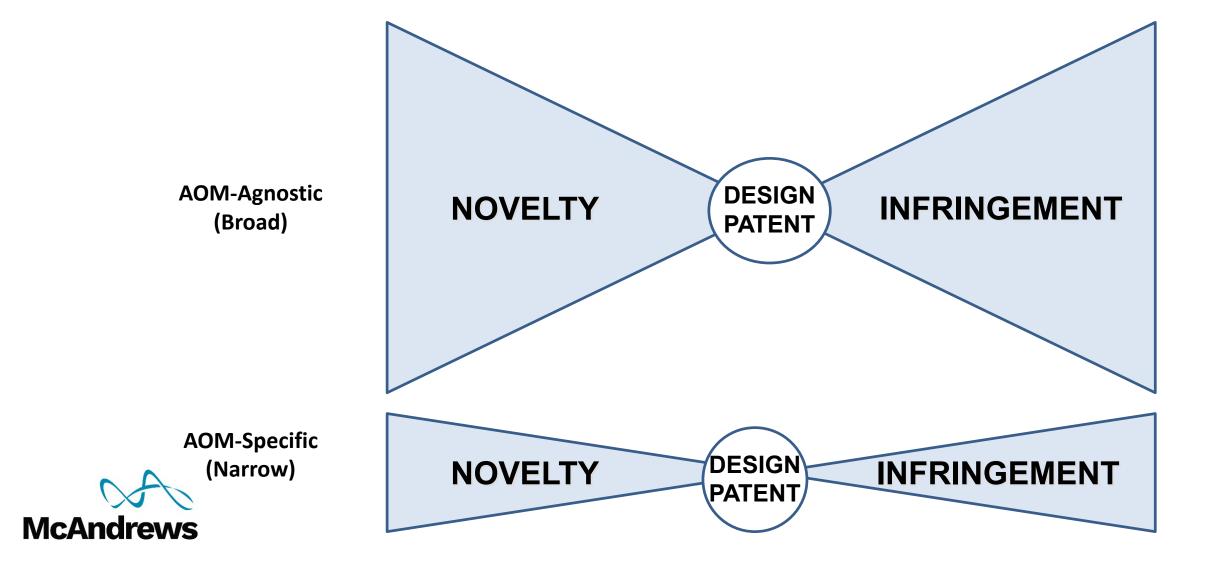
Design Patent Scope Imbalance







Design Patent Scope Equilibrium



Policy: Should Scope of Design Patents Be AOM-Agnostic or AOM-Specific?

- What was the designer's contribution? What did designer invent/create?
- Does per se protection disincentive creation of new designs? (same form, but new AOM?)
- Public Notice Function?
- More meaningful searching?
- USPTO Presumption of Validity? (35 USC§282)





Design Patent Infringement

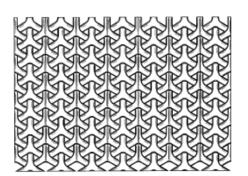
Curver v. Home Expressions Inc., 938 F.3d 1334 (Fed. Cir. 2019)

(12) United States Design Patent (10) Patent No.: US D677,946 S
Duvigneau (45) Date of Patent: 45 Mar. 19, 2013

(54)	PATTERN	FOR A CHAIR	
(75)	Inventor:	Nikolai Duvigneau, Zichron Yaacov (IL)	2010
(73)	Assignee:	Curver Luxembourg SARL, Neidercom (LU)	CN DE
(**)	Term:	14 Years	EP EP EP
(21)	Appl. No.:	29/389,254	GB WO
(22)	Filed:	Apr. 8, 2011	
(30)	Fe	oreign Application Priority Data	The Ir
0	et. 18, 2010	(IL) 50171	28, 20 The O
(51)		T	cation Tokui
	Field of Cl I D5/47-5	D6/500 lassification Search D6/500-502, 26/587, 595-598, 613, 616-619, 603-606; 54, 1-3, 23, 29, 11-12, 19, 56; 428/17-18, V151, 154, 156, 171, 187, 198-199, 542.2, 428/542,	view, Retrie 12198
	See applica	ation file for complete search history.	Prim (74)
(56)		References Cited	Jerak
		8. PATENT DOCUMENTS * 8/1927 Coryell	(57) The o
	2.022.266 4	4 211061 Englesse et al. 429/116	4760761

	(45) Date of Fatent: ** Mar. 19, 2015			
0	D648,544 S * 11/2011 Diventi et al			
-,	FOREIGN PATENT DOCUMENTS			
	CN 2566701 Y 8/2003 DE 1954 764 A1 5/1970 PP 0796 577 A1 9/1997 PP 701461-0009 5/2007 GB 2257 352 A 1/1993 WO 22067727 A1 9/2002			
	OTHER PUBLICATIONS			
1 0 2, 5; 3, 2,	The International Search Report for International Application No. PCT/III.2009:0001696, completed on Aug. 20, 2009, mailed on Oct. 28, 2009; three pages total. The Office Action issued Oct. 20, 2010, concerning European Application No. 09 754 322.7; five pages total. Tokujin Yoshioku: "AMI AMI chair" Milan Design Week 2008 Preview, [Online] Apr. 10, 2008 (Apr. 10, 2008), XP002542166 Retrieved from the Internet: URL http://www.dezain.net/en/thread/12198/>[retrieved on Aug. 21, 2009]. (Continued)			
5	(
	Primary Examiner — Kelley Donnelly (74) Attorney, Agent, or Firm — Nath, Goldberg & Meyer; Jerald L. Meyer			
	(57) CLAIM The ornamental design for a pattern for a chair, as shown and described.			
,	DESCRIPTION			
1 3 7	FIG. 1 is a front view of a design for a pattern for a chair; FIG. 2 is a top view of a design for a pattern for a chair; FIG. 3 is a bottom view of a design for a pattern for a chair; FIG. 4 is a perspective view of a design for a pattern for a chair; and, FIG. 5 is an enlarged view from the perspective view a rattan			

design for a pattern for a chair.



Claim: "The ornamental design for a pattern for a chair, as shown and described."

Title: "Pattern for a Chair"

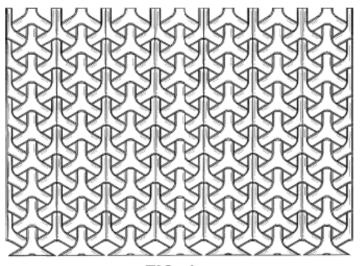


McAndrews

Design Claim Scope & Infringement

Curver v. Home Expressions Inc., 938 F.3d 1334 (Fed. Cir. 2019)

Patented Design "Pattern for a Chair"



Infringement?



Accused Product Basket



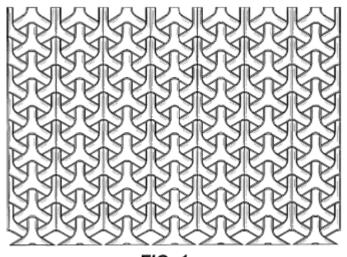




Design Claim Scope & Infringement

Curver v. Home Expressions Inc., 938 F.3d 1334 (Fed. Cir. 2019)

Patented Design "Pattern for a Chair"







Accused Product Basket



FIG. 1

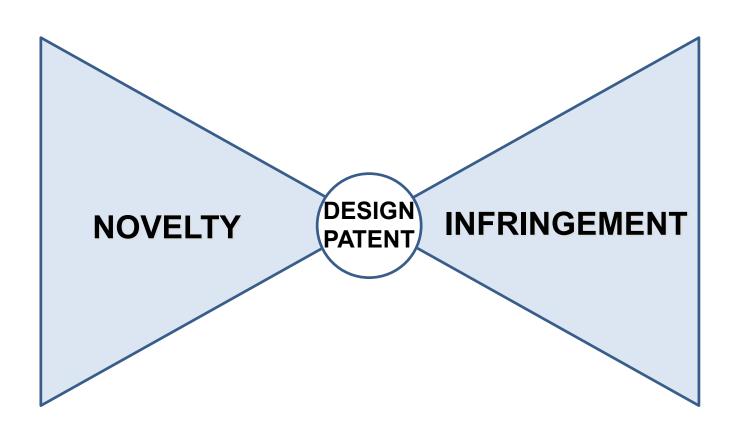
Limited Holding: "We HOLD that claim language can limit the scope of a design patent where the claim language supplies the only instance of an article of manufacture...".



Broader Holding: "The identify[ied] the article of manufacture serves to notify the public about the general scope afforded by the design patent."



Design Patent Scope Equilibrium

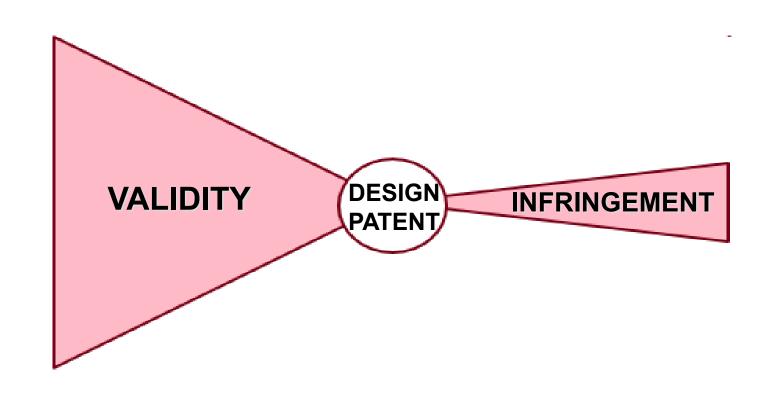




AOM-Agnostic (broad scope)



Design Patent Scope Imbalance







Design Claim Scope & Anticipation In re SurgiSil, 14 F.4th 1380 (Fed. Cir. 2021)

Prior Art Design

Anticipation

Blick® "Stump" Art Tool

Patented Design

"Lip Implant"

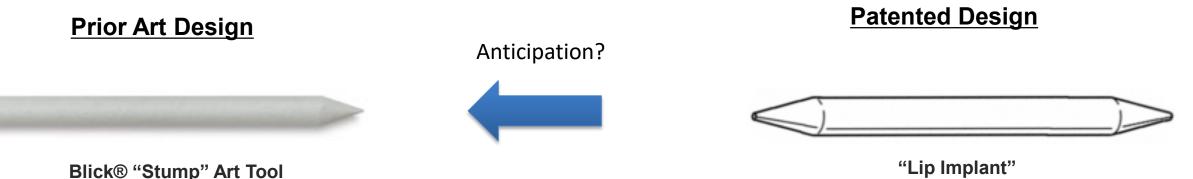




McAndrews

Design Claim Scope & Anticipation

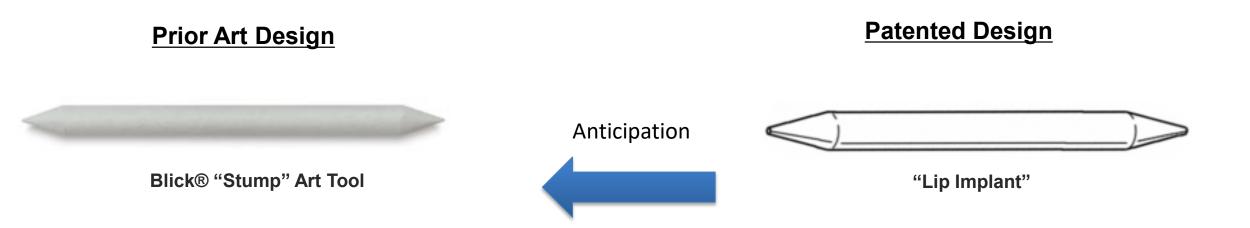
In re SurgiSil, 14 F.4th 1380 (Fed. Cir. 2021)



- "In *Curver*, we held that the claim at issue was <u>limited to the particular article of manufacture</u> identified in the claim."
- "A design claim Is limited to the article of manufacture identified in the claim."



Design Claim Scope & Anticipation In re SurgiSil, 14 F.4th 1380 (Fed. Cir. 2021)

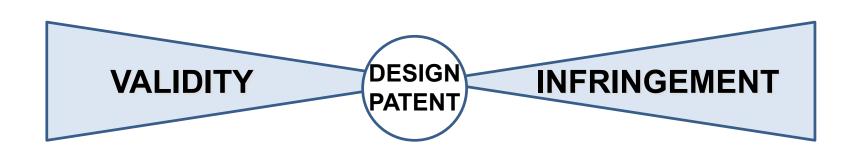


"Here, the claim identifies a lip implant. The claim language recites 'a lip implant,' and the Board found that the application's figure depicts a lip implant. As such, the claim is limited to lip implants and does not cover other articles of manufacture. There is no dispute that Blick discloses an art tool rather than a lip implant. The Board's anticipation finding therefore rests on an erroneous interpretation of the claim's scope."





Design Patent Scope Returned to Equilibrium (albeit much narrower)



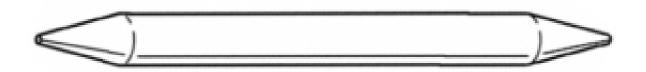




What is the Scope of Design Patent?

Patented Design

Claim: Lip Implant Title: Lip Implant



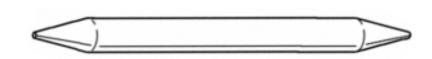
- "In *Curver*, we held that the claim at issue was <u>limited to the particular article of</u> manufacture identified in the claim."
- "A design claim Is limited to the article of manufacture identified in the claim."





What is the Scope of Design Patent?















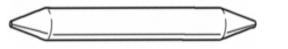




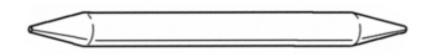
What is the Scope of Design Patent?

Lip Implant?

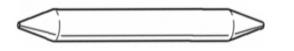
Patented Design
Lip Implant



Ear Implant?





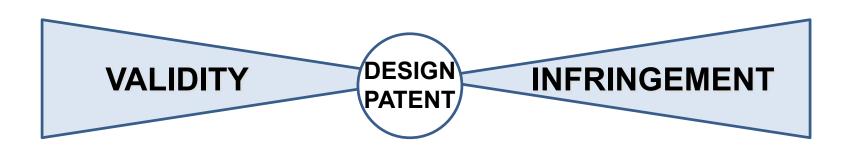


Toe Implant?





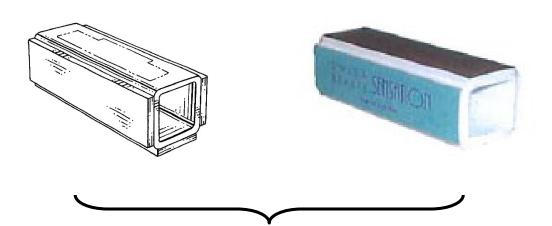
Design Patent Scope Returned to Equilibrium (albeit much narrower)







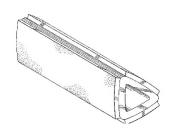
Patented Design Finger Nail Buffer Accused Design Finger Nail Buffer







Prior Art Finger Nail Buffers

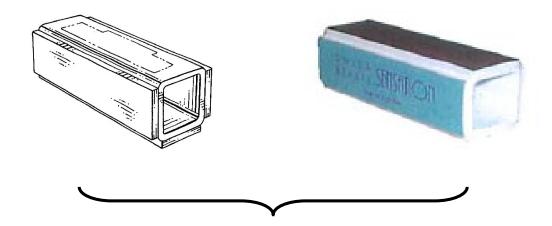














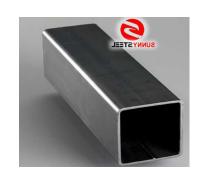


Or is Prior Art
Anything goes?

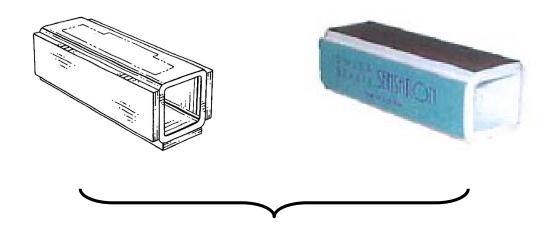
Children Toy?



Building joist?



Patented Design Finger Nail Buffer Accused Design Finger Nail Buffer



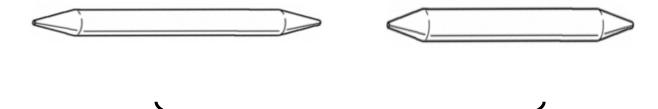




Prior Art
Art Stump Tool

Patented Design
Lip Implant

Accused Design
Lip Implant



Inclusion of visually close prior art "Art Stump Tool" (which is not a lip implant) in infringement analysis would <u>improperly</u> restrict scope of Patent Design directed to lip implants





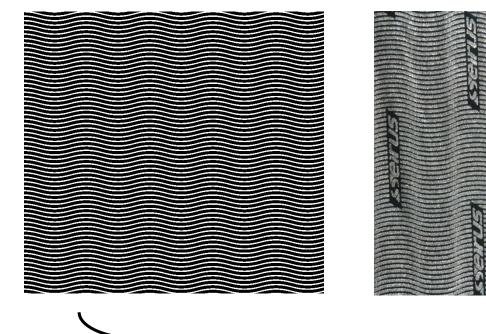
Prior Art?

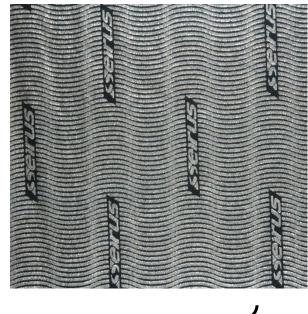
Patented Design:

Clam: Heat Reflective Material

Title: Heat Reflective Material

Accused Design
Heat Reflective Material





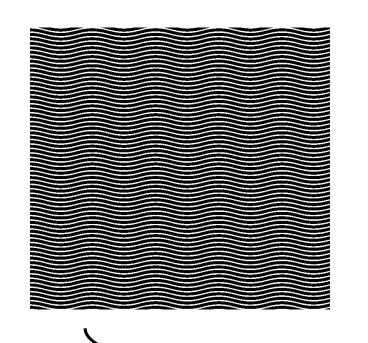


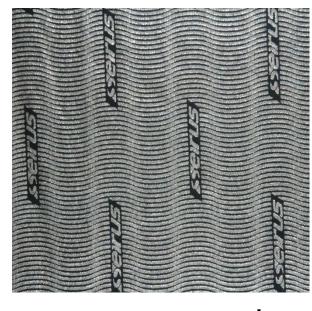


Patented Design:

Clam: Heat Reflective Material Title: Heat Reflective Material

Accused Design Floor Mat?





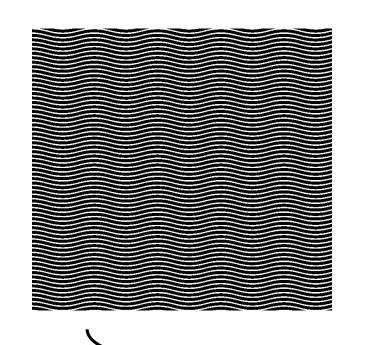


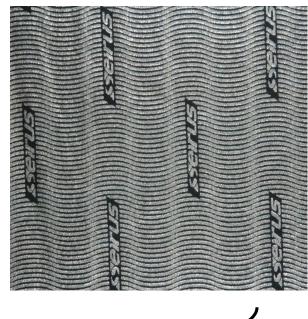


Patented Design:

Clam: Heat Reflective Material Title: Heat Reflective Material

Accused Design Tube Sock?









Prior Art?

1. "Unwoven product and process for making the same"

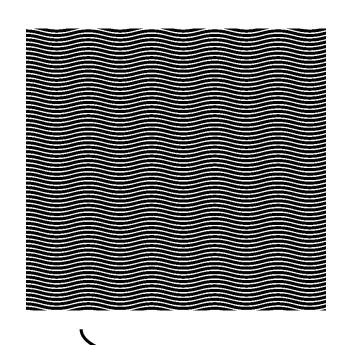
2. "Breathable shell for outerwear"

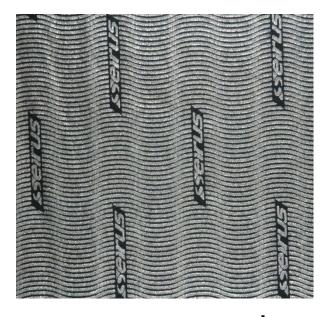
3. "Method of providing plastic sheets with inlaid stripes"

Patented Design:

Clam: Heat Reflective Material Title: Heat Reflective Material

Accused Design
Heat Reflective Material



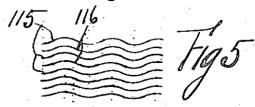




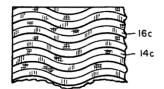


Prior Art?

1. "Unwoven product and process for making the same"

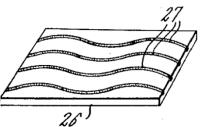


2. "Breathable snell for outerwear"



3. "Method of providing plastic sheets with inlaid stripes"



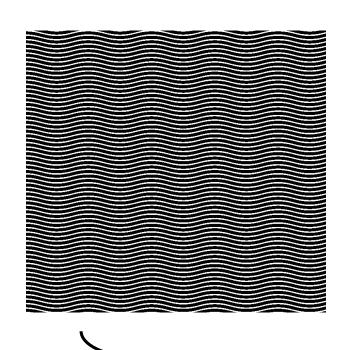


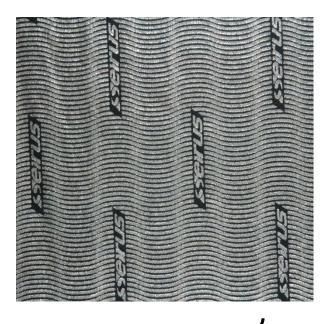
Patented Design:

Clam: Heat Reflective Material

Title: Heat Reflective Material

Accused Design Heat Reflective Material





Two Separate Realms Ordinary Observer vs. Designer of Ordinary Skill in the Art

infringement/a nticipation

ordinary observer

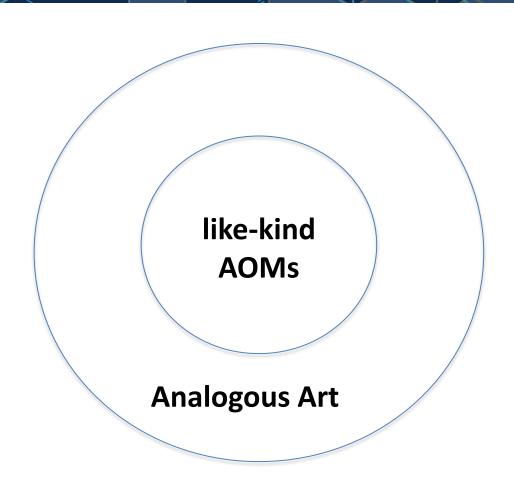
like-kind AOMs obviousness

one of ordinary skill in the art

analogous art



Analogous Art ≠ Like-Kind AOM





Like-Kind Article of Manufacture vs. Analogous Art?



Patent Design - Head Shaver



Title: Head Shaver Claim: Head Shaver

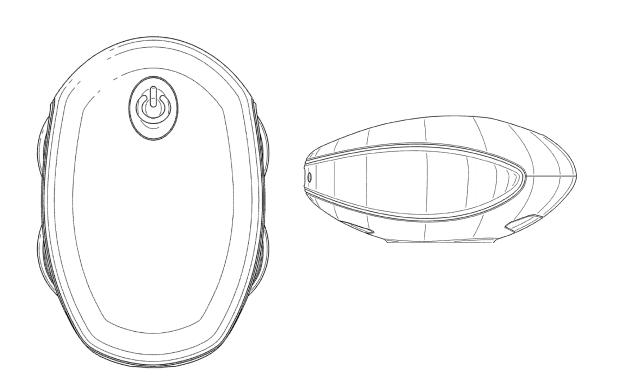




Like-Kind Article of Manufacture vs. Analogous Art?

Prior Art – Computer Mouse







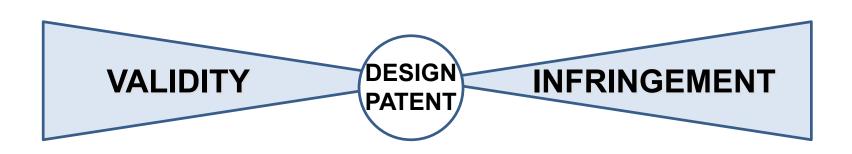




Like-kind AOM? NO
Analogous Art? YES (at least issue of fact)



Design Patent Scope Reaching Equilibrium/Narrower







Thank you!

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Surprise Slides!



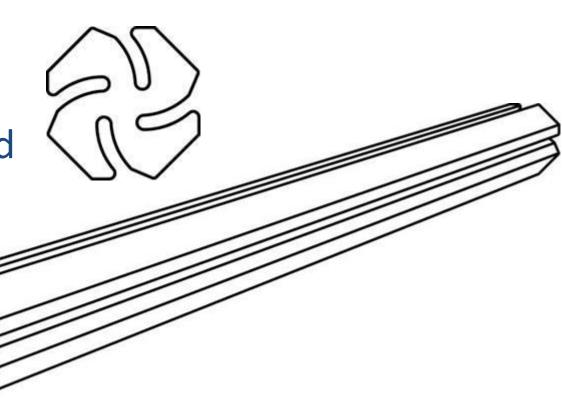




JP D1724834
 Nisshin Flour Milling Welna Co Ltd



• Licorice



Video Door Bell



Dog Training System

- Doesn't want to design its own remote control. Takes design from his video door bell and used it for his remote for his dog training system (with one button being for vibrate and the other being for light shock)
- Files new design application entitled "Remote for a Dog Training System"



Is It Patentable? Why Or Why Not?





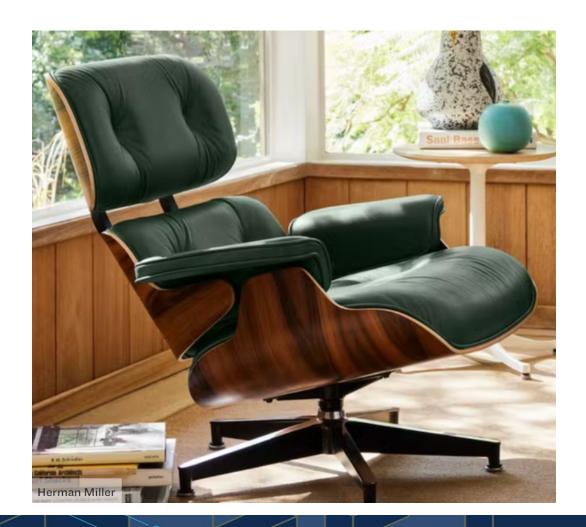
Iconic Eames Chair

- Designed in 1956
- Still popular today



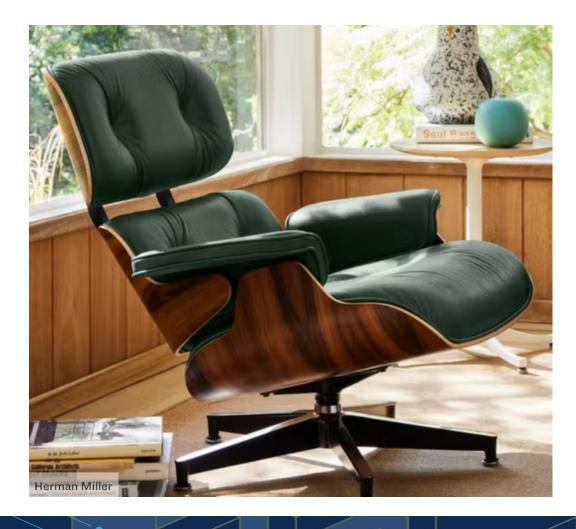
Slydog Mfg. Co.

- Adds massagers inside chair leather
- Files new design patent application
- Claims: a design for a "Massager"



Is It Patentable? Why Or Why Not?







Thank you!

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