

**Federal Circuit Bar Journal**  
**Student Editorial Board**  
*The George Washington University Law School*  
2021–2022

**Editor-in-Chief**

Olivia Sacks

**Executive Editor**

Kimberly Henrickson  
Wenxuan Ni

**Senior Articles Editor**

Sarah Green

**Submissions Editor**

Brandi Tennant

**Senior Notes Editor**

Megan Hackett

**Articles Editors**

Ni Hsieh  
Katherine Iturra  
Rachael Singer  
Matilda Mead

**Managing Editor**

Iman Naieem

**Notes Editors**

Bert Piper  
Marcus Ireland  
Tania Suarez-Marquez  
Alexandra Marshal

**Senior Staff Members**

Luigi Aletto  
Danielle Alvarez  
Mei Li Bartholome  
Giavana Behnamian  
Megan Brickler  
Sarah Brown  
Timothy Choo  
Jacquelyn Clark  
Caitlin Conflenti  
Brittany Genthert

Rachel Gerstenfeld  
Elena Hoffman  
Kalyani Joshi  
Mark Karabajakian  
Olivia Kaufmann  
Sam Lachow  
Sean Lee  
Samantha Maksey  
David McConnell  
Jackie Mutai

Hannah Odom  
David Olivar  
Alexis Pozonsky  
Ruifeng Pu  
Ryan Sarlo  
Ali Sarwari  
Laela Shallal  
Lindsay Swinson  
Conor Walsh

**Junior Staff Members**

Anam Abid  
Bilikisu Adeyemi  
Shanni Alon  
Amanda Bini  
Sydney Blitman  
Matthew Broussard  
Charles Carroll  
Evan Conner  
Brianna Cox  
Kar Cusick  
Elena DeJaco  
Amine El Ghouayel  
Jonathan Ellett  
Abhinav Garg  
Jeremy Glick  
Abby Goldstein  
Caralea Grant

Grace Guarnieri  
Elizabeth Hamner  
John Hanebuth  
Ashley Hartman  
Sarah Haskins  
Samuel Hemmingstad  
Caitlin Hubbard  
Annmarie Irwin  
Milica Ivanis  
Madeline Jenkins  
Tae Yeon Kim  
Yoonhye Kim  
Elizabeth Korbut  
Alexandra Krebs  
Peter Kuri  
Meredith Little  
Gillian Mak

Aaron Margulis  
Claire McGuinness  
Lily McLean  
Alessandra Palazzolo  
Chelsea Pardes  
Austin Park  
Katrina Ramkissoon  
Regan Richards  
Philip Russell  
Melissa Schlosberg  
Shalin Shah  
Jordan Snow  
Sabrina Stanzyk-Guzek  
Joshua Trinkler  
Armand Valenzi

# Federal Circuit Bar Journal

Volume 31, Number 1

## FACULTY EDITORIAL COMMITTEE

Steven L. Schooner  
*Professor*  
*The George Washington University Law School*  
*Washington, DC*

Joshua I. Schwartz  
*Professor*  
*The George Washington University Law School*  
*Washington, DC*

John M. Whealan  
*Associate Dean, Intellectual Property*  
*The George Washington University Law School*  
*Washington, DC*

## ASSOCIATION JOURNAL ADVISORY COMMITTEE

Deborah Miron, Esquire  
*Executive Director*  
*The Federal Circuit Bar Association*  
*Washington, DC*

## FOUNDER

Gerald H. Bjorge  
*Washington, DC*

## FEDERAL CIRCUIT BAR ASSOCIATION® OFFICERS

Laura P. Masurovsky, Esquire  
*President*  
*Finnegan, Henderson, Farabow, Garrett & Dunner, LLP*  
*Washington, DC*

Joseph M. Reisman, Ph.D., Esquire  
*President-Elect*  
*Knobbe Martens*  
*Irvine, CA*

Patrick C. Keane, Esquire  
*Treasurer*  
*Buchanan Ingersoll & Rooney PC*  
*Alexandria, VA*

Jennifer H. Wu, Esquire  
*Secretary*  
*Paul, Weiss, Rifkind, Wharton*  
*& Garrison LLP*  
*New York, NY*

Sonal N. Mehta, Esquire  
*Immediate Past President*  
*WilmerHale LLP*  
*Palo Alto, CA*

## EX OFFICIO

Peter R. Marksteiner  
*Chief Executive of The U.S. Court of Appeals*  
*for the Federal Circuit*  
*Washington, DC*

## BOARD OF DIRECTORS

William H. Burgess, Esquire  
*Kirkland & Ellis LLP*

Matthias A. Kamber, Esquire  
*Paul Hastings LLP*

Charlene M. Morrow, Esquire  
*Fenwick & West LLP*

Timothy C. Brightbill, Esquire  
*Wiley Rein LLP*

John 'Jack' Kelly, Esquire  
*Supernal*

Corey Salsberg, Esquire  
*Novartis*

James 'Jim' Calkins, Esquire  
*Qualcomm Incorporated*

F. Scott Kieff, Esquire  
*Kieff Strategies LLC*

Susan Swafford, Esquire  
*United States Merit Systems*  
*Protection Board*

John A. Dragseth, Esquire  
*Fish & Richardson P.C.*

Thomas Krause, Esquire  
*United States Patent and*  
*Trademark Office*

Andrew Trask  
*Williams & Connolly LLP*

Ann G. Fort, Esquire  
*Eversheds Sutherland (US) LLP*

Sandra Kuzmich, Ph.D., Esquire  
*Haug Partners LLP*

Irene Yang  
*Sidley Austin LLP*

Erin P. Gibson, Esquire  
*DLA Piper (US) LLP*

Brian McCaslin  
*Sanofi*

Jennifer Yokoyama, Esquire  
*Microsoft Corporation*

Emily Johnson, Esquire  
*Amgen Inc.*