

CHANGES TO PART IV OF THE CIVIL CODE

(Taking effect from October 1, 2014)

Foreword

Russian IP Law has gone a long way in less than 25 years. It started in 1991, when several laws were adopted in the USSR. That was not an easy task, because the legislation prior to that time was based on state property while the country went overnight to a system of free market. Notwithstanding, those laws on intellectual property, adopted by the USSR, were workable, if not ideal, during that landmark epoch. Just one year later, the Soviet Union collapsed and the newly born Russian State urgently adopted its own laws. In the sphere of intellectual property, no major changes were made; however, some amendments were nevertheless made. Those laws operated for more than 10 years, and only in 2003—2004 were there introduced legislative amendments considering the new business realities and correcting some of the shortcomings of the previous laws. In 2006-2008, further changes were made with all intellectual property laws being consolidated as Part IV of the Civil Code which emphasized the great importance attached to intellectual property by the Russian government.

Shortly thereafter, systematic work began on further improvement of the Civil Code. For several years discussions were held among various public and private sectors on proposals to improve the legislation. At this time, changes concerned not only intellectual property, but also other parts of the Civil Code. Considerable effort was made to make this a transparent and open process of legislative reform with debates being had on many proposals. The draft legislation underwent three readings as well as numerous considerations before specialized committees of the State Duma, it underwent wide public discussion, and finally, in the spring of 2014, the Bill was passed by the Duma and signed by the President of the Russian Federation as the Law of March 12, 2014, № 35-FZ. In this new law, various shortcomings were corrected, there were resolved previously unresolved matters, and the requirements of international treaties were taken into consideration, in particular, owing to Russia's accession to the WTO. These significant amendments and additions come into force on October 1, 2014.

It is believed that the updated law will greatly contribute to better realization and protection of the rights of intellectual property owners.

The Law firm Gorodissky and Partners has prepared this review reflecting the main changes made in the relevant chapters of the revised Civil Code relating to each subject matter of industrial property which will allow applicants and other market participants to better understand the rules and procedures for the acquisition of IP rights and their legal protection.

GENERAL PROVISIONS

Disposal of the Exclusive Right

According to the amendments made to Articles 1234 and 1235, the Civil Code introduces a **ban on payment-free assignment of** exclusive intellectual property rights between commercial entities.

Registration of Transactions

Articles 1232, 1369, and 1490 provide that in case of any transaction with respect to registered IP subject matter (i.e. invention, utility model, industrial design, and trademark) basic information about the deal shall be submitted to the Patent Office rather than the contracting documents proper. The law also specifies what information about the deal must be communicated to the Patent Office (note that the financial terms of the contract are not required to be disclosed and the submission of the contract will be optional).

Liability for Patent Infringement (taking effect from January 1, 2015)

A new Article 1406¹ is included in the Civil Code which establishes liability for patent infringement.

The new article provides that in case of infringement of the exclusive right to an invention, utility model or industrial design the rights owner, aside from other applicable measures provided by law shall have the right to demand compensation in court instead of damages from the infringer:

- 1) in the amount from 10 thousand to 5 million Rubles (\$300 to \$170,000) determined at the discretion of the Court depending on the nature of infringement; or
- 2) double the license price which is usually charged under comparable circumstances for the lawful use of a patented subject matter by the same method as used by the infringer.

INVENTIONS

Subject matters Protected as Inventions

Article 1350 provides that it is possible to formulate the subject matter of the invention through the **use of a product with or a method for a particular purpose**.

Prior art

While evaluating the novelty of an invention the prior art will also include, on condition of earlier priority, all industrial design applications filed by other persons in Russia on which patents were granted (Article 1350).

Patent Term Extension

Article 1363 is supplemented with a provision pursuant to which the extension of the patent term for inventions relating to medicines or agrochemicals shall be made by issuing an **additional patent** with the claims containing a combination of features of the patented invention characterizing the product for the use of which permission has been previously obtained.

Also a number of the procedural rules have been added to the PTE procedure. In particular, the Patent Office may mandatorily require additional materials without which consideration

of the application is not possible. The time for the submission of these materials will be three months from the date of the inquiry with the possibility of extending that term (by not more than by 10 months).

Application for an Invention

Article 1375 is amplified with the requirement that the specification of an invention shall disclose its **substance in sufficient detail for the embodiment of the invention by a person skilled in the art**, and the claims shall clearly express its essence and be fully supported by the specification.

Amendments of the Application Documents

Article 1378 provides that the applicant will be able to make additions, refinements and corrections to the application documents, **only by submitting additional materials (including modified claims) upon request of the examiner; and on his own initiative - only once after receiving a report on the results of the information search conducted regarding the application.**

Article 1378 also lists the cases where additional materials are recognized as changing the substance of the patent application, namely:

- additional materials containing features to be included in the claims which were not disclosed in the application documents submitted on the filing date. It is important to note that the current version of the law mentions the priority date.
- additional materials containing another invention that does not meet the requirement of the unity of an invention with respect to the documents that have already been admitted for examination of the invention or a group of inventions;
- additional materials containing an indication of a new technical result, which is provided by the invention, and that is not associated with the result specified in the original application.

Publication of the Application and the Search Report

Article 1385 changes the term during which the applicant can withdraw the application to prevent its publication: this will be 15 (instead of the current 12) months from the filing date.

According to new wording in Article 1386, the search reports, conducted during the substantive examination or following a request for an information search, shall be published for all applications.

Sending a Search Report

Article 1386 provides that the search report upon the application for which a request for examination was filed simultaneously with the filing of the application, will be sent to the applicant «before the expiration of seven months» from the date of commencement of the substantive examination.

Observations of Third Parties on Patentability

Article 1386 is supplemented with a provision of the right of any person after the publication of information about the application to provide to the Patent Office their observations on the patentability of the invention, which must be considered during examination of the application. The submission of such observations, however, does not give the person, who has submitted them, any procedural rights when the Patent Office considers the application.

Substantive Examination of an Application for an Invention

According to the amendment to Article 1386, during substantive examination, there will be further verification of the adequacy of the disclosure of the claimed invention in the original application documents for the embodiment of the invention by those skilled in the art. Failure to comply with this requirement in the application documents shall be an independent ground for refusing to grant a patent.

Notice of Readiness to Grant a Patent

Changes in Article 1387 provide that the Patent Office is not obliged any more to send a notice to the applicant about the prospective issuance of a patent.

Contesting the Office Action of Grant of a Patent

Article 1393 provides that in case the Office Action granting of a patent is appealed by the applicant, non-payment of the registration fee and the fee for the issuance of a patent will not result in the patent application being withdrawn.

Procedural Terms

The approach is changed regarding the calculation of time limits for any action of the applicant during examination of the application. There is a new time reference in the amended law: the reference point is the date of sending the document by the Patent Office instead of the date of receipt of this document by the applicant. In addition, the time limits are increased by one month.

This applies to:

- the time limit for responding to an inquiry during formal examination or substantive examination of the application (i.e., three months from the date of sending by the Patent Office of the inquiry or of the copies of cited references);
- the time limit for responding to a notice of non-observance of the unity of the invention (three months from the date a notification is sent by the Patent Office);
- the time limit for responding to a notification about the existence of an application for an identical invention or utility model, having the same priority date (twelve months from the date a notification is sent by the Patent Office);
- the time limit for requesting the materials cited against the application (two months from the

date of inquiry or Office Action by the Patent Office);

- the time limit for responding to a notification of a contemplated rejection to issue a patent (six months from the date a notification is sent by the Patent Office);
- the time limit for filing objections to an Office Action (seven months from the date of sending an Office Action or copies of cited documents by the Patent Office).

Invalidation of a Patent for Invention

In addition to the existing grounds for contesting the validity of a patent, one more is introduced. According to the new wording of paragraph 2 of Article 1398, a patent for an invention may be declared invalid due to an inconsistency in the application documents submitted on the date of their filing with the requirement of disclosure of the substance of the invention in sufficient detail to embody the invention by those skilled in the art.

Thus, failure to comply with the requirements of Article 1375, obliging the applicant to disclose the substance of the invention in the specification in sufficient detail to embody the invention by those skilled in the art, is a further independent ground for the refusal to grant a patent, and for revoking a patent.

*The same grounds can be used to revoke a patent after the expiration of its validity, **but only by an interested person.***

Converting a Patent for an Invention into a Patent for a Utility Model

Article 1398 is amended to provide that during the period of contesting a patent for an invention, the patent holder shall be entitled to apply for conversion of that patent for an invention into a utility model patent, if the term of the patent has not exceeded the term of utility model patent. The application for conversion is satisfied if the invention patent has been invalidated in full and if the utility model complies with the requirements for the patentability of utility models. In the case of conversion of a patent for an invention into a patent for a utility model, the priority date and the date of application are preserved.

If a petition for conversion is satisfied a patent for a utility model is issued.

Establishing the Fact of Use of the Invention

Article 1358 is supplemented with a description of actions that are considered to be the use of an invention which is defined as the use of the product for a specific purpose: «introduction on the market or storage for that purpose of the product intended to be used in accordance with the purpose specified in the claims.»

According to the amendment, when determining the fact of use of the invention within the doctrine of equivalents, the equivalent features shall now have been known by the priority date of the invention, rather than by the date of the alleged use.

Dependent Invention

The new Article 1358¹ introduces the concept of a dependent invention. Such an invention is

understood to be an invention where its use as a product or process is impossible without the use of another patented invention, utility model, or industrial design having an earlier priority. In particular, a dependent invention is an invention protected by a product use patent in which another invention's use is protected by a patent with an earlier priority. Furthermore, a dependent invention is also the invention, whose claims differ from the claims of the other invention or other utility model but only in their intended use.

A dependent invention cannot be used without the permission of the owner of the patent for an invention, a utility model, or an industrial design, in relation to which it is dependent.

Right of Prior Use

Article 1361 is supplemented with a provision that extends the right of prior use not only to a previously used identical solution, but also to a solution, which differs from the patented invention by its equivalent features only.

Right of Post-use

Article 1400 provides that the right of post-use (which is the third person's right to further use of the invention after a patent, terminated because of non-payment of maintenance fee, is restored) can be transferred to another person only with the enterprise, which was involved in the prior use or preparation for the use of the invention.

UTILITY MODELS

Term of Validity of the Exclusive Right for Utility Model

The term of validity of utility model patents shall be 10 years from their filing date. No extension is possible (Article 1363). This change will take effect from January 1, 2015. Thus, it will not be possible to extend the period of validity of utility models, whose 10-year terms expire on January 1, 2015 onwards.

Prior Art

Novelty and industrial applicability remain conditions of patentability of utility models.

However, when evaluating novelty, account will be taken of any publicly available information, including that which became known through the open use or sale of the product anywhere in the world.

Additionally, when assessing the novelty of a utility model, all applications for industrial design filed in Russia by other persons and having an earlier priority for which patents have been issued will also be taken into account along with invention applications and applications for utility models.

Application for a Utility Model and Requirement of Unity for Utility Models

According to the new wording of Article 1376 the application and claims of the utility model shall relate to one utility model. There will no longer be the possibility to file a group of utility models in a single application.

Thus, there should be only one independent claim to a utility model and the use of alternative features in this claim will be possible only on condition that such an independent claim relates to one utility model.

Amendments/Additions to Utility Model Application Documents

The applicant will be able to make amendments to the application documents only by submitting additional materials on the request of the Examiner.

There will be additional restrictions on the allowable changes. Paragraph 2 of Article 1378 lists cases where additional materials shall be considered changing the substance of the application for a utility model, and hence there shall not be allowed, namely:

- additional materials containing a different utility model. This restriction will not allow replacing the utility model described in the claim by another utility model described in the specification. The filing of a divisional application will nevertheless be possible;
- additional materials seeking to include features in the claim which were not disclosed in the application on the filing date. It is to be noted that the current wording of the Article mentions the date of priority in this regard;
- additional materials indicating a new technical result achieved by the utility model which is not related to the technical result contained in the original application documents.

Examination of the Utility Model

The new wording of Article 1390 provides for an obligatory substantive examination of utility model applications before the grant of a patent. The substantive examination shall be carried out after positive results of formal examination and requires no special petition. The substantive examination shall include:

- a search to determine the existence of any prior art against which the Examiner will examine the patentability of the claimed utility model;
- verification of the fact that the claimed utility model does not relate to subject matters excluded from protection as a utility model;
- examination of the sufficiency of disclosure of the utility model in the application documents so that a person skilled in the art could embody it;
- a check for the conformity of a claimed utility model with the criteria for patentability.

Appealing of the Office Action Granting a Patent

The amended Article 1393 provides that if the applicant appeals the decision granting a patent, the non-payment of the registration/issuance fee shall not lead to the recognition of the application as withdrawn.

Procedural Deadlines

Changed is the approach to the calculation of time limits for the applicant's actions during examination of the application. The countdown of the deadline will begin from the date that a document is sent by the Patent Office, and not from the date of receipt of that document by the applicant. At that, some of the time limits are extended by one month.

This applies to:

- time limit for response to a request during formal examination or substantive examination of the application (three months from the date of sending the request by the Patent Office, or copies of the cited materials);
- time limit for response to notification of violation of the unity of the utility model (three months from the date of sending the notification by the Patent Office);
- time limit to reply to notification of the existence of an application for an identical invention or utility model with the same priority date (twelve months from the date of sending the notification by the Patent Office);
- time limit to request materials from the Patent Office cited against the application (two months from the date of sending the request or Office Action by the Patent Office);
- time limit for filing an appeal against the Office Action (seven months from the date of sending the Office Action or copies of the cited materials).

Invalidation of a Utility Model Patent

In addition to the grounds available now for appealing the validity of a patent one more ground is added. According to the new wording of Article 1398 a utility model may be invalidated because of the non-compliance of application documents submitted on the filing date with the requirement of disclosure of the utility model sufficient for the implementation of a utility model by a person skilled in the art.

Thus, failure to comply with the provisions of Article 1376 requiring disclosure of the utility model in the specification in sufficient detail for the implementation of the utility model by a person skilled in the art becomes a separate ground for refusal to grant a patent, or for the invalidation of a patent.

In the same way, a utility model can be challenged after the expiration of its validity, but only by an interested person.

Establishing the Fact of Use of a Utility Model

A utility model shall be recognized as being used in a device if the device contains every feature of the utility model cited in the independent claim of the utility model. At that, the doctrine of equivalents shall not apply any more.

Dependent Utility Model

The Law introduces the concept of a dependent utility model. According to the new Article 1358¹, this shall be a utility model, the use of which is not possible without the use of another invention, utility model or industrial design protected by patent and having an earlier priority.

Dependent shall be also a utility model with a claim that is different from the claims of another invention or utility model by its purpose only.

The law prohibits the use of a dependent utility model without the permission of the owner of a patent for invention, utility model or industrial design, on which it is dependent.

INDUSTRIAL DESIGNS

The Term of Validity (taking effect from January 1, 2015)

The maximum term of validity remains 25 years however it will be granted in 5-year periods. It is emphasized that the term of validity of a patent issued for a divisional application shall be calculated from the date of filing of the original application (Article 1363).

Conditions of Patentability of Industrial Design and Prior Art (Article 1352)

Novelty and originality remain conditions of patentability. However, novelty will be examined with account of other person's applications for inventions, utility models, and trademarks.

Originality of the claimed industrial design will be determined by «the general impression that it produces on the informed consumer» in comparison with a known design.

The features that define only the ergonomic characteristics of the product shall not be considered as the essential features of the industrial design. The features conditioned by purely technical function of the product, are also excluded from consideration.

Patentable Subject Matter

Architectural structures and other stationary structures, as well as objects of unstable shape are no longer listed as unprotectable subject matters. At the same time protection shall not be granted to the designs that can mislead the consumer, including in relation to earlier conflicting rights of another person (Article 1352(5)).

A new Article 1231¹ provides that, like for trademarks, protection shall not be granted to industrial designs reproducing or imitating official symbols, names and other distinctive signs. By analogy with trademarks, the concept of «non-protectable elements» of the industrial de-

sign is introduced – these are those official symbols, names and distinctive signs which can be included in the industrial design only with the consent of the relevant competent authority.

Likewise for trademarks, no registration of industrial designs shall be allowed which are identical to, or produce the same general impression as, or include:

- the images of cultural values that are kept in collections and foundations;
- the name of a work of literature, art, or science, character or citation therefrom; a work of art or fragment thereof;
- the name, pseudonym, a designation derived therefrom, or a portrait or facsimile of a person famous in Russia

without agreement of the owners, persons authorized by the owners, the famous person or his/her heirs, accordingly.

This means that letters of consent will be allowed similar to those used in trademark procedure.

Collision of the Exclusive Rights

The principle of senior right (Article 1252) will be extended to industrial designs. As a result, the owner of a senior trademark or company name will be able to contest the later grant of legal protection to an industrial design, and the owner of a senior industrial design will be able to challenge the later registration of a trademark or demand that the later company name should not be used.

Application for Industrial Design

The list of essential features of the industrial design shall not be included in the application any more. Instead, a set of pictures submitted with the application should give a comprehensive view of the essential features of the industrial design which define aesthetic characteristics of the appearance of a product.

Convention Priority

The right of priority can be recognized (Article 1382) even if the certified copy of the first application is filed late (i.e., after 3 months from the date of filing of the application). The Patent Office shall restore the right of priority, if (1) a request to that effect is made within 3 months from the filing date, (2) the copy was requested from the Office of first filing within 8 months from the filing date of that first application, and (3) the copy of the first application is filed with the Patent Office within two months from receipt of that copy by the applicant.

Amendments of the Documents of the Application

Changes to a design application can only be made on request of the Examiner. Submission of new images from which the essential features existing in the originally submitted images have been removed shall be an inadmissible change of the design application.

Contesting the Office Action Granting

Should the applicant contest the Office Action Granting a design patent, non-payment of the patent registration fee shall not result in the withdrawal of the application (Article 1393).

Procedural Deadlines

The approach is changed for the calculation of time limits for the applicant's actions during the examination of the application. The reference date shall be the date of dispatch of the document by the Patent Office, rather than the date of receipt of the document by the applicant. At that, some terms are extended by one month.

This concerns:

- the time limit to respond to the request during formal or substantive examination of the application (three months from the date of sending of the request by the Office, or copies of the cited materials);
- the time limit for reply to a notification of non-observance of unity of the industrial design (three months from the date of sending of the notification by the Patent Office);
- the time limit for reply to a notification of identical design applications having the same date of priority (twelve months from the date of sending of the notification by the Patent Office);
- the time limit for requesting the materials cited against the design application (two months from the date of the request or of the Office Action);
- the time limit for filing an appeal against the Office Action (seven months from the date of the Office Action or from sending the copies of the cited materials).

Establishing the Fact of Use of the Industrial Design

The patented design shall be considered used in an article if the article has all the essential features of the patented design, or equivalent combination of features, which produce the same overall impression on the informed consumer as the patented industrial design, provided the design and the article have similar function.

Dependent Industrial Design

A concept of dependent industrial design is introduced in the law (new Article 1358¹). That is a design which cannot be used in an article without the use of another patented industrial design, invention, or utility model having an earlier priority. Dependent industrial design may not be used without the permission of the owner of the patent for an invention, utility model or industrial design, on which it is dependent.

Publication of Patent for Industrial Design

When the patent is issued, the image(s) of the article will be published which give a comprehensive view of all essential features of the patented industrial design.

Invalidation of Industrial Design

In addition to the existing grounds, a patent for industrial design can be contested if it includes official symbols, names and other distinctive signs without the consent a competent body.

Scope of Protection

Scope of protection conferred by a patent for an industrial design shall be determined by the combination of essential features found in the images shown in the patent.

Assignment of Industrial Design

Assignment of a patent for an industrial design shall not be allowed if the assignment can mislead the consumer about the product or its manufacturer.

TRADEMARKS

Grounds for Refusal of Registration of a Trademark

Aside from restrictions on the use of official symbols and signs mentioned in Article 6ter of the Paris Convention and already incorporated in Russian law, the Civil Code introduces a new Article 1231¹ imposing restrictions on the use of designations which include, reproduce or imitate official symbols, names and signs or their recognizable parts. The consent of the competent authority is required not only for inclusion of the means of individualization as unprotected elements of signs, symbols, etc., but also in relation to the inclusion of their recognizable parts or imitations.

Letter of Consent

Article 1483 provides that no letter of consent is allowed from the owner of a well-known mark, or collective mark. In addition, it is clearly stated that permission from the owner of a senior right does not guarantee the registration of similar marks if the Patent Office considers that such registration could mislead the consumers.

Withdrawal of the consent shall not be allowed which will contribute to a more balanced approach of the right holders to grant consent to the registration of similar marks.

Availability of Application Documents

The following changes are made in Article 1493:

- the Patent Office shall publish information on trademark applications;
- third persons shall have the right to get acquainted with all the documents on file, and not only with the original documents.

Examination of the Claimed Designation

According to amendments in Article 1499 the Examiner shall be obliged to consider information received from third persons. This change will reduce the number of appeals after registration of the trademarks. The Patent Office shall also send notifications on the results of examination in all cases where the Patent Office intends to reject the application, whether in whole or in part, so that the applicant may put forward his arguments.

Procedural deadlines

Changed is the approach for the calculation of time limits for applicant's actions during examination of an application. The countdown date shall be the date of sending of the document by the Patent Office instead of the date of receipt of the document by the applicant which simplifies the process of calculation of the time limits and enables the Office to accurately set the end date of the term. As a result, the deadline is extended by one month.

This applies to:

- the time limit to respond to a an inquiry during formal examination or substantive examination of the claimed designation (three months from the date of inquiry or sending copies of the cited materials);
- the period for settlement of the situation where the priorities of applications from different applicants coincide (seven months from the date of the notification by the Patent Office);
- the deadline for requesting cited materials (two months from the date of the inquiry or Office Action);
- the term for appealing an Office Action (four months from the date of the Office Action or of the sending of copies of the cited documents).

Reinstatement of missed deadlines

Article 1501 removes the need to confirm the excusable reasons for missing deadlines (it is sufficient to indicate the reason for the failure) which exclude bias when decision on reinstatement is being taken.

Divisional application

Article 1502 allows the applicant to divide the application not only at the stage of examination but also during examination of an appeal against an Office Action. However this change limits the use of the division procedure during the examination of the appeal: the appeal should concern only the Office Action issued on the basis of Article 1483(2), i.e. on the basis of similarity in designations.

Appealing Office Actions

Because of the changes in Article 1503, non-payment of the registration fee will no longer be a ground for recognition of the application as being withdrawn in the case an objection against the Office Action of Registration having been filed in respect to part of the list of goods.

Challenging Registration of Trademarks

Article 1512 introduces new grounds to challenge the registration of a trademark:

- inclusion in the trademark of designations identical or confusingly similar to the means of individualization of other persons – during five years from the date of publication;
- recognition of actions of the trademark owner related to the registration of another trademark confusingly similar to a disputed trademark as acts constituting an abuse of rights or unfair competition - during the whole period of validity of a trademark's registration;
- wrong registration of identical trademarks with the same priority in respect to coinciding lists of goods in the name of different persons, instead of the recognition of applications as withdrawn as prescribed by law - during the whole period of validity of a trademark's registration.

Article 1512 is supplemented by a provision to the effect that while challenging the registration of the trademark because of non-compliance with requirements of Article 1483 (grounds for refusal of registration of the trademark) or Article 1478 (owner of the exclusive rights to a trademark) there should be taken into account the circumstances existing on the date of the appeal.

APPELLATIONS OF ORIGIN

Multiple Applicants

If the application is filed by several persons the amendments to Articles 1518 and 1522 provide that each of them should confirm that the product produced by him possesses special properties. Only in this case, a certificate for the right to use the appellation of origin shall be issued to him.

Availability of Application Documents for Third Parties

The application shall be published, without the indication of specific properties of the goods, and the third parties shall have the right to submit to the Patent Office arguments about protectability of the claimed designations before an Office Action is taken, and those arguments shall be taken into account during that examination.

Office's Duty to Seek the Opinion of a Competent Body

The Patent Office acquires the right and duty to seek the opinion of a competent Government body both at the stage of examination of the application for appellation of origin, and in case of an extension of the validity of a certificate for an appellation of origin, as well as in the event of a request to amend the statement of the special properties of the goods, if the applicant himself has not submitted such report.

Control of Specific Characteristics of Goods

A competent body will have the right to control the specific characteristics of the product for which the appellation of origin has been registered.

Deadlines

The term of extension for filing a response to an inquiry shall be limited to 6 months.

The term for filing request for restoration of a missed term by the applicant (the term of response to an inquiry, the term to file an appeal) shall be extended from 2 to 6 months.

The requirement to confirm justifiable reasons for missing such terms have been excluded.

Calculation of the period for issuance of a certificate: instead of the date of receipt of the payment of the fee document by the Patent Office, the one month term shall be calculated from the payment date which should lead to a quicker issuance of the certificate.

TRANSITIONAL PROVISIONS

All applications and appeals/invalidation actions filed and pending on October 1, 2014, shall continue to be considered according to the old rules and with the application of criteria of protectability existing on the date of filing of the application.

