

UNITED STATES PATENT AND TRADEMARK OFFICE

In the Matter of:	)	
	)	
Sanjay Bhardwaj,	)	Proceeding No. D2022-24
	)	
Respondent.	)	
_____	)	

FINAL ORDER PURSUANT TO 37 C.F.R. § 11.24

Pursuant to 37 C.F.R. § 11.24, Sanjay Bhardwaj (“Respondent”) is hereby excluded from the practice of patent, trademark, and other non-patent law before the United States Patent and Trademark Office (“USPTO” or “Office”), for violation of 37 C.F.R. § 11.804(h), having been disciplined by a duly constituted authority of a state.

I. BACKGROUND

1. At all times relevant to this Complaint, Respondent of Fremont, California has been registered to practice in patent matters before the USPTO. Respondent’s USPTO Registration Number is 65,999. Respondent is subject to the USPTO Rules of Professional Conduct set forth at 37 C.F.R. § 11.101 *et seq.* The Director of the USPTO has jurisdiction over this proceeding pursuant to 35 U.S.C. §§ 2(b)(2)(D) and 32, and 37 C.F.R. §§ 11.19 and 11.24.

2. At all times relevant hereto, Respondent has been an attorney in good standing licensed by California to practice law in that jurisdiction and attorney of record in trademark application(s) pending before the Office, subject to the USPTO Rules of Professional Conduct.

3. By Order dated January 2, 2020, in *In re Sanjay Bhardwaj*, State Bar Court No. 14-O-00848, the Supreme Court of California disbarred Respondent from the practice of law in that jurisdiction.

4. Rule 5.442(B) of the Rules of Procedure of the State Bar of California states that “[e]xcept as provided in the order of disbarment, no petition for reinstatement will be filed within five years after the effective date of the petitioner’s disbarment. . . .” Under this rule, Respondent must wait at least five years from the effective date of his disbarment, January 2, 2020, before he may petition for reinstatement to the State Bar of California.

5. On November 10, 2020, the United States Court of Appeals for the Ninth Circuit reciprocally disbarred Respondent. *See* OED Response, Exhibit (“Ex.”) D, (Ninth Circuit reciprocal disciplinary proceedings).

6. On June 11, 2021, the United States District Court for the Central District of California also reciprocally disbarred Respondent, noting that he had disregarded its previous order to notify it of the Ninth Circuit’s decision. *See* OED Response, Ex. E, (U.S. District Court for Central District of California reciprocal disciplinary proceedings).

Facts Underlying California Discipline

7. During marital dissolution proceedings in 2009, Respondent withheld certain financial information from the Court and his ex-wife, and Respondent was sanctioned by two different judges, in the amount of \$1,500 and \$15,000,¹ in connection with his nondisclosure of financial information during the legal proceedings. *In re Bhardwaj*, Case No. 14-O-00848, 2019 WL2051006, at *2-3 (Cal. State Bar Ct. Review Dep’t, May 1, 2019).² The Judge in the marital proceedings noted that Respondent’s conduct was “shocking” and further that it “frustrated the policy of the law. . . .” *Id.* at *3.

¹ After the dissolution, “reserved financial issues” were tried in two separate proceedings regarding child and spousal support, and divisions of the parties’ assets. *In re Bhardwaj*, 2019 WL2051006, at *2.

² The May 1, 2019 Review Department Order provides a succinct description of the marital dissolution proceedings that triggered the underlying California discipline that forms the basis for these reciprocal disciplinary proceedings. The Review Department Order is publicly available but is also attached to the OED Director’s Response at Exhibit A-1.

8. Respondent filed three notices of appeal based on the decisions of both judges. *Id.* at *3. He did not report his \$15,000 sanction to the State Bar. *Id.* It remains unclear if he reported the second sanction, in the amount of \$1,500. *Id.*

9. On February 28, 2012, the trial court's sanctions were affirmed by the First District Court of Appeal and Respondent was found to have filed a frivolous appeal for the purpose of delay. *Id.* at *3. Respondent was again sanctioned and ordered to pay \$60,000 to his ex-wife and her attorney. *Id.* The appellate court also ordered that a copy of its opinion be forwarded to the State Bar for investigation and possible discipline. *Id.* California's Office of Chief Trial Counsel ("OCTC") received the sanction report on August 28, 2012 and sent a letter to Respondent regarding the sanctions order. *Id.* On March 15, 2013, Respondent reported the \$60,000 sanction, seven months after it was issued. *Id.*

10. On March 10, 2014, in connection with multiple hearings on property issues, Respondent was sanctioned an additional \$10,500 for his continued "recycling of the same unmeritorious and rejected arguments", requiring multiple hearings on the property issues. *Id.* at *3. On September 28, 2015, Respondent reported this sanction to the State Bar, 18 months after it was issued. *Id.*

State Disciplinary Action

11. In 2017, California's OCTC charged Respondent with 13 counts of misconduct. *Id.* at *1.

12. After a five-day trial, Respondent was found culpable ten counts of misconduct, including 1) three counts of failing to timely report to the State Bar the judicial sanctions imposed upon him, 2) maintaining an unjust action; 3) failing to support the laws; 4) two counts of moral turpitude; 5) two counts of failure to maintain respect due courts and judicial officers; and 6) encouraging the commencement and continuance of an action from a corrupt motive. *Id.* at *1. The Judge found significant harm, a pattern of misconduct, and indifference in

aggravation, with no factors in mitigation, and recommended disbarment. *Id.* The hearing judge described Respondent as “unapologetic” and “relentless.” *Id.*

13. On review, on May 1, 2019 the Review Department affirmed eight of the hearing judge’s culpability findings, including three counts of failure to report sanctions, two counts of failure to respect the judiciary, failing to maintain a just action, failing to maintain the duty not to encourage action based on corrupt motive, and moral turpitude. *Id.* at *13. After considering aggravating factors of multiple acts of wrongdoing, pattern of misconduct, bad faith, significant harm, indifference toward rectification/atonement, and finding no evidence of mitigating factors, the State Bar Court of California Review Department recommended that Respondent be disbarred from the practice of law in California. *Id.* at *11-14.

14. By Order dated January 2, 2020, in State Bar Court No. 14-O-00848, the Supreme Court of California adopted the California Bar’s recommendation and disbarred Respondent from the practice of law in that jurisdiction. *See* OED Response, Ex. A-2 (*In re Bhardwaj*, State Bar Court No. 14-O-00848, S25660 (*en banc* order by California Supreme Court)).

15. On September 28, 2020, Respondent also file a Petition for Writ of Certiorari with the United States Supreme Court. *Bhardwaj v. State Bar of Cal.*, No. 20-417, 2020 WL 5898919 (2020). Respondent identified the two issues for review as: 1) “Can California State Bar Court consider trial transcripts which are not certified, are false and product of antecedent forgery after trial, for purpose of appellate review?”, and 2) “Where false and forged transcripts are claimed as above and for newly discovered evidence never considered by lower courts of certain forgery, can California Supreme Court deny a motion for a new trial, without denial of procedural and substantive due process to its subject, under the Fifth Amendment of the United States

Constitution?” *Id.* Respondent’s Petition was denied on November 9, 2020. *Bhardwaj v. State Bar of Cal.*, 141 S. Ct. 818 (2020).

16. On November 1, 2017, the Ninth Circuit Court of Appeals issued an order requiring Respondent to show cause why his right to practice in the Ninth Circuit should not be suspended based on his involuntary enrollment as an inactive member of the California Bar, which occurred when the Hearing Department of the State Bar Court recommended his disbarment. *See* OED Response, Ex. D. (*In re Bhardwaj*, No. 17-80222 (Report and Recommendation)). The Ninth Circuit thereafter denied Respondent’s motion to dismiss for lack of subject matter jurisdiction but granted a temporary stay of the reciprocal proceedings pending a final decision by the Review Department, and Respondent filed periodic status reports. *See* OED Response, Ex. D, (Ninth Circuit docket)).

17. On November 10, 2020, after Respondent filed two responses arguing lack of sworn testimony and falsification of transcripts in the California disciplinary proceedings, the Ninth Circuit “adopted in full” the Report and Recommendation and reciprocally disbarred Respondent. *See* OED Response, Ex. D (*In re Bhardwaj*, No. 17-80222 (9th Cir. Nov. 10, 2020) (Order) and Ninth Circuit Docket).

18. On June 24, 2020, the United States District Court for the Central District of California issued an order to Respondent to show cause why he should not be reciprocally disbarred. *See* OED Response, Ex. E (*In re Bhardwaj*, No. AD20-00726 PSG (Central Dist. Cal. June 11, 2021) (Order of Disbarment) and Central District of Cal. Docket). Respondent raised arguments concerning “‘a criminal conspiracy arrangement’ among the hearing judge, the state bar counsel, and witnesses facilitating ‘false transcripts of court proceedings’ and ‘large scale criminal activity involved in the entire State Bar Court apparatus,’” and various procedural requests. *See*

OED Response, Ex. E (Respondent's Motion to Stay, at 3-4 ¶¶ 5, 7; 5 ¶ 16). However, on June 11, 2021, the United States District Court for the Central District of California disbarred Respondent based on the California disbarment and his failure to timely respond to the order to show cause. *See* OED Response, Ex. E (*In re Bhardwaj*, No. AD20-00726 PSG (Central Dist. Cal. June 11, 2021) (Order of Disbarment)).

USPTO Reciprocal Discipline Proceeding

19. Despite an obligation to notify USPTO of his California discipline within 30 days, *see* 37 C.F.R. § 11.24(a), OED first learned of Respondent's California discipline on June 8, 2022, via information sent by an investigator in the Office of Enforcement of the State Bar of California. *See* OED Response, Ex. A-1 (Grievance).

20. On September 8, 2022, OED sent correspondence to the Supreme Court of California requesting "two (2) certified copies of the Order of Disbarment issued January 2, 2020" regarding Respondent. *See* OED Response, Ex. A-2. In response, on September 15, 2022, OED received two certified copies of the requested order of disbarment. *See id.* Each copy received is dated January 2, 2020, is certified as of September 12, 2022 as a true copy, and states, "The court orders that Sanjay Bhardwaj, State Bar Number 257780, is disbarred from the practice of law in California and that his name is stricken from the roll of attorneys." *Id.*

21. On October 26, 2022, a "Notice and Order Pursuant to 37 C.F.R. § 11.24" ("Notice and Order") was sent by certified mail (receipt no. 70220410000250013700 and 70220410000250013717) notifying Respondent, through counsel, that the Director of the Office of Enrollment and Discipline ("OED Director") had filed a "Complaint for Reciprocal Discipline Pursuant to 37 C.F.R. § 11.24" ("Complaint") requesting that the Director of the United States Patent and Trademark Office impose reciprocal discipline upon Respondent identical to the

discipline imposed by the January 2, 2020 Order of the Supreme Court of California in State Bar Court No. 14-O-00848, disbaring Respondent from the practice of law in that jurisdiction. The Notice and Order provided Respondent an opportunity to file, within forty (40) days, a response opposing the imposition of reciprocal discipline identical to that imposed by the January 2, 2020 Order of the Supreme Court of California in State Bar Court No. 14-O-00848 based on one or more of the reasons provided in 37 C.F.R. § 11.24(d)(1).

22. On November 3, 2022, in lieu of a Response to the Notice and Order, Respondent filed a pleading entitled “Respondent’s Petition to USPTO Director to Dismiss And Or In The Alternative Motion to Stay Due to Pendency in Reciprocal Jurisdiction.” (“Motion to Dismiss”). Respondent’s Motion to Dismiss requested that the USPTO Director dismiss, or in the alternative issue a stay regarding, the pending USPTO reciprocal proceedings. In support of that Motion to Dismiss, Respondent represented under penalty of perjury: “I ceased substantial patent and trademark practice as an attorney effective 5/17/2022. I gave up the title of patent attorney as of 5/17/2022 so as to avoid being held as holding oneself as an attorney.” Motion to Dismiss, Bhardwaj Decl. ¶ 6. Separately, Respondent’s Petition represented that he “has already ceased substantial parts of practice in patents since 5/17/2017. Motion to Dismiss at 8. Respondent also requested an extension of time to file a response to the Notice and Order. On December 1, 2022, Respondent’s Motion was denied in its entirety.

23. Thereafter, on December 9, 2022, the Agency received a series of pleadings titled as set forth below, and unless specifically noted otherwise, these pleadings are hereinafter cumulatively treated as “Response to Notice and Order”:

- Respondent’s Pleadings Regarding Notice And Order;
- Respondent’s Presentation Of Evidence Appendices A, B, C, D, E;
- Respondent’s Facts And Circumstances Statement Regarding State Court Matter;

- Respondent's Statement On Grave Injustice;
- Respondent's Infirmary Of Proof And Due Process Statement; and
- Respondent's Further Pleadings And Errata Correction On His Petition To USPTO Director.

24. A Briefing Order was issued on December 13, 2022, directing the OED Director to respond to Respondent's pleadings on or before January 18, 2023 and permitting Respondent to Reply to the OED Director's briefing no later than 14 days from the OED Director's filing.

25. On January 18, 2023, the USPTO Director responded ("OED Response") to Respondent's Response to Notice and Order.

26. Respondent filed a Reply on February 1, 2023, which was received by the USPTO on February 8, 2023.

II. LEGAL STANDARD

Reciprocal disciplinary proceedings are not in any sense *de novo* proceedings. *See In re Barach*, 540 F.3d 82, 84 (1st Cir. 2008); *In re Surrick*, 338 F.3d 224, 232 (3d Cir. 2003). Rather, pursuant to 37 C.F.R. § 11.24(d), and in accordance with *Selling v. Radford*, 243 U.S. 46 (1917), the USPTO has codified standards for imposing reciprocal discipline based on a state's disciplinary adjudication. Pursuant to *Selling*, state disbarment creates a federal-level presumption that imposition of reciprocal discipline is proper, unless an independent review of the record reveals: (1) a want of due process; (2) an infirmity of proof of the misconduct; or (3) that grave injustice would result from the imposition of reciprocal discipline. *Id.* at 51. Federal courts have generally "concluded that in reciprocal discipline cases, it is the respondent attorney's burden to demonstrate, by clear and convincing evidence, that one of the *Selling* elements precludes reciprocal discipline." *In re Kramer*, 282 F.3d 721, 724 (9th Cir. 2002); *In re Friedman*, 51 F.3d 20, 22 (2d Cir. 1995). "This standard is narrow, for '[a Federal court, or here the USPTO Director is] not sitting as a court of review to discover error in the [hearing judge's]

or the [state] courts' proceedings.'” *In re Zdravkovich*, 634 F.3d 574, 578 (D.C. Cir. 2011) (second and third alterations in original) (quoting *In re Sibley*, 564 F.3d 1335, 1341 (D.C. Cir. 2009)).

The USPTO’s regulation governing reciprocal discipline, 37 C.F.R. § 11.24(d)(1), mirrors the *Selling* standard:

[T]he USPTO Director shall consider the record and shall impose the identical public censure, public reprimand, probation, disbarment, suspension, or disciplinary disqualification unless the practitioner demonstrates by clear and convincing evidence, and the USPTO Director finds there is a genuine issue of material fact that:

- (i) The procedure elsewhere was so lacking in notice or opportunity to be heard as to constitute deprivation of due process;
- (ii) There was such infirmity of proof establishing the conduct as to give rise to the clear conviction that the Office could not, consistently with its duty, accept as final the conclusion on that subject;
- (iii) The imposition of the same public censure, public reprimand, probation, disbarment, suspension or disciplinary disqualification by the Office would result in a grave injustice; or
- (iv) Any argument that the practitioner was not publicly censured, publicly reprimanded, placed on probation, disbarred, suspended or disciplinarily disqualified.

Id.

To prevent the imposition of reciprocal discipline, Respondent is required to demonstrate that there is a genuine issue of material fact as to one of these criteria by clear and convincing evidence. *See id.* As discussed below, however, Respondent has not shown by clear and convincing evidence that there is a genuine issue of material fact with regard to any of the factors set forth in 37 C.F.R. § 11.24(d)(1).

III. ANALYSIS

In his Response to Notice and Order, Respondent challenges the imposition of reciprocal discipline on several grounds. Respondent argues that he suffered a deprivation of due process, that the state court discipline suffered from an infirmity of proof, and that reciprocal discipline

will lead to a grave injustice. He also asserts various other arguments including that reciprocal discipline is untimely, that reciprocal discipline should be ordered *nunc pro tunc*, as well as other deficiencies. The OED Director argues that Respondent has not met his burden of proof by clear and convincing evidence in any of the factors under 37 C.F.R. § 11.24, and disputes the other bases offered by Respondent. The OED Director thus argues that a reciprocal exclusion is appropriate.

Having considered all of the pleadings, as well as the record of evidence produced by the parties, it is determined that a reciprocal exclusion is appropriate. Despite the lengthy procedural background, Respondent's many motions, and his numerous allegations and arguments, and as further explained below, the conclusions in this matter are relatively straightforward. Respondent has wholly failed to carry his specific burdens under 37 C.F.R. § 11.24 and reciprocal discipline is appropriate. Further, Respondent is not entitled to discipline *nunc pro tunc*, and has failed to prove any of his other allegations and defenses.

A. Respondent Was Not Deprived of Due Process.

Respondent asserts that the imposition of reciprocal discipline would constitute a deprivation of due process. His arguments include challenges to authenticity of evidence and transcripts during the California disciplinary proceedings, failure to consider evidence, and challenges to substantive decisions of the various tribunals. *See* Response to Notice and Order (Respondent's Infirmary of Proof and Due Process Statement). However, these challenges are little more than attempts to relitigate the state disciplinary matter. It is not necessary to address each, specific allegation that Respondent has made here since the documents Respondent has proffered and is relying on, are insufficient to establish a deprivation of due process under 37 C.F.R. § 11.24(d)(1).

“The fundamental requirement of due process is the opportunity to be heard at a meaningful time and in a meaningful manner.” *In re Karten*, 293 F. App’x 734, 736 (11th Cir. 2008) (quoting *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976)). In disciplinary proceedings, an attorney is entitled to due process, such as reasonable notice of the charges before the proceedings commence. See *In re Ruffalo*, 390 U.S. 544, 551 (1968); *In re Cook*, 551 F.3d 542, 549 (6th Cir. 2009) (procedural due process includes fair notice of the charge). Due process requirements are satisfied where a respondent “attended and participated actively in the various hearings, and was afforded an opportunity to present evidence, to testify, to cross-examine witnesses, and to present argument.” *In re Squire*, 617 F.3d 461, 467 (6th Cir. 2010) (quoting *Ginger v. Cir. Ct. for Wayne Cnty.*, 372 F.2d 620, 621 (6th Cir. 1967)); see *In re Zdravkovich*, *supra* (stating that attorney could not satisfy a claim of due process deprivation where he was given notice of the charges against him, was represented by counsel, and had hearing at which counsel had the opportunity to call and cross-examine witnesses, make arguments, and submit evidence). Due process requirements are also met where a respondent is given “an opportunity to respond to the allegations set forth in the complaint, testify at length in [his] own defense, present other witnesses and evidence to support [his] version of events . . . , [and is] able to make objections to the hearing panel’s findings and recommendations.” *In re Squire*, 617 F.3d at 467 (ellipsis and third alteration in original) (quoting *In re Cook*, 551 F.3d at 550). These standards and considerations, as set forth here, have been repeatedly applied by the USPTO Director in determining whether or not a practitioner has suffered a deprivation of due process under 37 C.F.R. § 11.24(d)(1)(i). See, e.g., *In re Khaliq*, Proceeding No. D2020-28 (USPTO, Mar. 31, 2021); *In re Faro*, Proceeding No. D2019-09 (USPTO, Feb. 21, 2020); *In re Baker*, Proceeding No. D2019-08 (USPTO, Aug. 8, 2019); *In re Chaganti*, Proceeding No. 2015-10 (USPTO, Aug.

4, 2015).

Here, Respondent does not claim that he failed to receive notice of the disciplinary charges against him, or that he was prevented from actively participating in the underlying disciplinary case. Nor could Respondent credibly make those arguments. “Due process requirements are satisfied where a respondent attended and participated actively in the various hearings, and was afforded an opportunity to present evidence, to testify, to cross-examine witnesses, and to present argument.” *In re Rheinstein*, Proceeding No. D2021-06, at 15 (USPTO, July 22, 2022) (internal quotations marks omitted). With that in mind, the record unequivocally establishes that Respondent received notice of the charges and fully and vigorously participated in the California disciplinary proceedings. The procedural posture recited in the Review Department’s Order, which is undisputed by Respondent, reveals that he had a hearing in California in which he fully participated, he appealed unfavorable rulings to the Review Department, and then to the California Supreme Court. *See generally, In re Bhardwaj*, No. 14-O-00848, 2019 WL 2051006 (Review Dep’t); OED Response, Ex. A-2. The exhibits and pleadings provided by the parties conclusively shows that Respondent received notice of the disciplinary charges, filed motions, actively participated in the proceedings, and had the opportunity to vigorously oppose attorney discipline, albeit without success.³

Not being able to show that he was deprived notice of, and ability to participate in, his California disciplinary case, Respondent relies on arguments challenging evidence, the authenticity of evidence, as well as substantive issues and ruling of the California tribunals. *See*

³ Respondent also vigorously disputed reciprocal discipline in the Ninth Circuit and before the Central District of California, both unsuccessfully. *See* OED Response, Exs. E, D. These challenges included the unsuccessful argument that he suffered a deprivation of due process in his reciprocal discipline proceedings before the Ninth Circuit. *See* OED Response, Ex. D.

Response to Notice and Order (Regarding Notice And Order, at 5); (Respondent's Infirmity Of Proof And Due Process Statement, at 6). However, although these issues are couched under "due process," they are no more than mere disagreement with the California state tribunals' findings and conclusions. Such disagreement is not a basis for finding a deprivation of due process. *See In re Rheinstein*, Proceeding No. D2021-06, at 13 ("Reciprocal disciplinary proceedings are not in any sense *de novo* proceedings."); *In re Khaliq*, Proceeding No. D2020-28, at 13. Tribunals have broad discretion to admit or refuse evidence into the record. *In re Khaliq*, Proceeding No. D2020-28, at 17 (citing *In re Harper*, 725 F.3d 1253, 1258 (10th Cir. 2013) (citing, in turn, *United States v. Scheffer*, 523 U.S. 303, 328 (1998)); *In re Williams*, 398 F.3d 116, 118 (1st Cir. 2005) (A "state court's substantive findings are entitled to a high degree of respect when this court is asked to impose reciprocal discipline.)) "A proceeding designed to weigh the advisability of reciprocal discipline is not a vehicle for retrying the original disciplinary proceeding." *Id.* (quoting *In re Barach*, 540 F.3d at 87). "Nor is it a vehicle either for the correction of garden-variety errors or for revisiting of judgment calls." *Id.* (internal quotation marks omitted) (rejecting practitioner's due process claims where "unremarkable" claims of evidentiary errors, procedural errors, and other errors were raised).

In sum, Respondent has not shown by clear and convincing evidence that there is a genuine issue of material fact that the procedure in the California disciplinary matter was so lacking in notice and opportunity to be heard as to constitute a deprivation of due process.

B. There Was No Infirmity of Proof in the State Disciplinary Decision.

Practitioners may also challenge the presumption that reciprocal discipline is proper by presenting clear and convincing evidence that there is a genuine issue of material fact as to whether there was such an infirmity of proof establishing the misconduct as to give rise to a clear

conviction that the USPTO could not, consistent with its duty, accept as final the state's conclusion on that subject. 37 C.F.R. § 11.24(d)(1)(ii). In his pleadings that constitute the Response to Notice and Order, Respondent raises several pages of challenges and arguments concerning various findings and conclusions of the underlying state disciplinary proceedings. *See* Response to Notice and Order (Respondent's Infirmity of Proof and Due Process Statement, at 2-3, 5-6, 12-13). These arguments again include allegations that the state proceedings relied upon or referenced false transcripts and unauthenticated documents. *See id.* at 4.

To successfully invoke infirmity of proof as a defense to reciprocal discipline, Respondent must demonstrate that there was such an infirmity of proof establishing the charges against him as to give rise to the clear conviction that accepting the state discipline would be inconsistent with the USPTO's duty. *In re Zdravkovich*, 634 F.3d at 579 (alterations in original). "This is a difficult showing to make. . . ." *Id.* Determinations by the trier-of-fact regarding the credibility of witnesses generally receive deference. *Id.* at 580. Also, as already noted, "[a Federal court, or here the USPTO Director is] not sitting as a court of review to discover error in the [hearing judge's] or the [state] courts' proceedings." *Id.* at 578 (second and third alterations in original) (quoting *In re Sibley*, 564 F.3d at 1341). Therefore, mere disagreement about the credibility of a witness or findings fact and legal conclusions do not establish an infirmity of proof.

Here, Respondent makes no argument that there was insufficient proof that he committed the violations for which he was disbarred. As the OED Director notes in his Response, Respondent does not dispute that, under the facts and applicable law, he failed to report judicial sanctions three times, failed to respect the judiciary, maintained an unjust action, encouraged an action based on corrupt motive, and committed an act involving moral turpitude. *See* OED Response, at 20. Rather, as discussed further below, Respondent's arguments are little more than

disagreement with California disciplinary tribunals' findings and conclusions. And, as already stated, "mere disagreement about the credibility of a witness or findings [of] fact and legal conclusions do not establish an infirmity of proof." *In re Rheinstein*, Proceeding No. D2021-06, at 20.

In support of his infirmity of proof defense, Respondent continues to claim that the California disciplinary proceedings were doctored or falsified, and that there were authentication problems for evidence in those proceedings. *See* Response to Notice and Order (Respondent's Infirmity of Proof and Due Process Statement, at 1-4). In sum, his position is that the California disciplinary tribunals were incorrect in ruling against them. *Id.* at 5-16. But these are the same arguments considered and rejected by the State, the California Supreme Court, as well as the U.S. Supreme Court. *See In re Bhardwaj*, 2019 WL 2051006, at *2 n.3, *7 n.11 (Review Dep't); OED Response (Ex. A-2) (Cal. Supreme Court); *Bhardwaj v. State Bar of Calif.*, No. 20-417, 2020 WL 5898919 (2020), *cert. denied*, 141 S. Ct. 818 (2020). Although not dispositive, it is also noted that the Ninth Circuit issued a reciprocal disbarment and, in doing so, rejected Respondent's infirmity of proof argument. *See* OED Response, Ex. D, at 36-39.⁴

In addition to these arguments, Respondent also appears to argue that the State Bar of California lacked jurisdiction to issue discipline since his underlying misconduct did not involve the practice of law and that the statute of limitations for the state discipline had expired. *See* Response to Notice and Order (Respondent's Facts And Circumstances Statement Regarding

⁴ Although Respondent argues "It is important for the USPTO to note that no federal court made any finding related to frivolousness or meritless litigation, or any other cause to discipline Practitioner as an attorney," *see* Response to Notice and Order (Respondent's Infirmity Of Proof And Due Process Statement, at 5), this representation is false. For example, in the reciprocal disciplinary matter pending before the Ninth Circuit, that tribunal concluded, among other things, that there was "considerable evidence that Bhardwaj's arguments were both objectively meritless and subjectively motivated, at least in part, by a desire to delay and harass." *See* OED Response, Ex. D, at 39.

State Court Matter, at 3 ¶ 7). However, again, this argument has already been raised and rejected by the Review Department, which rejection was adopted by the California Supreme Court, and there is basis to collaterally review those findings here. *See In re Bhardwaj*, 2019 WL 2051006, at *4, *10; OED Response, Ex. A-2.

Based on the foregoing, Respondent's arguments that he proffers as infirmity of proof are nothing more than disagreements with the findings and conclusions of the state disciplinary proceedings. He raises no dispute or challenge to any fact on which the actual findings of state misconduct were based. Consequently, Respondent has not shown by clear and convincing evidence that there is a genuine issue of material fact as to whether there was an infirmity of proof establishing the misconduct.

C. There Would Be No Grave Injustice in Imposing Reciprocal Discipline.

Respondent also claims that imposing reciprocal discipline here would amount to a grave injustice. Again however, upon closer review, this argument is again little more than an attempt to rehash arguments and positions raised in the state disciplinary matter. This is an improper analysis under 37 C.F.R. § 11.24(d)(1)(iii).

The grave injustice analysis focuses on whether the severity of the punishment "fits" the misconduct and allows for consideration of various mitigating factors. *See In re Thav*, 852 F. Supp. 2d 857, 861-62 (E.D. Mich. 2012); *see also In re Kramer*, 282 F.3d at 727 (on challenge to imposition of reciprocal discipline, "we inquire only whether the punishment imposed by [the first] court was so ill-fitted to an attorney's adjudicated misconduct that reciprocal disbarment would result in grave injustice"); *In re Attorney Discipline Matter*, 98 F.3d 1082, 1088 (8th Cir. 1996) (no grave injustice where disbarment imposed by the state court "was within the appropriate range of sanctions"); *In re Benjamin*, 870 F. Supp. 41, 44 (N.D.N.Y. 1994) (public

censure within range of penalties for misconduct and thus censure was not a grave injustice). “As long as the discipline from the state bar was within the range of appropriate sanctions, it is not grave injustice for the [USPTO] to impose reciprocal discipline.” *Persaud v. Dir. of the USPTO*, No. 1:16-cv-00495, 2017 WL 1147459, at *2 (E.D. Va. Mar. 27, 2017).

Respondent makes no argument relevant to the applicable grave injustice standard. He makes no argument regarding whether disbarment is an appropriate sanction for the misconduct found in California disciplinary proceedings. Instead, he again attempts to reargue the findings and conclusions of state proceeding, as well as raises other complaints about hardships and fairness of imposing reciprocal discipline. *See generally*, Response to Notice and Order (Respondent’s Statement on Grave Injustice). These arguments are simply not pertinent to the grave injustice analysis and provide no basis to prohibit reciprocal discipline.

Contrary to Respondent, and with the grave injustice standard in mind, the OED Director cited appropriate and applicable authority to support the conclusion that Respondent’s disbarment is an appropriate sanction in California, as well as under USPTO precedent. *See* OED Response, at 23; *In re Rheinstein*, Proceeding No. D2021-06 (USPTO, July 22, 2022) (exclusion); *In re Warren*, Proceeding No. D2010-22 (USPTO, June 11, 2010) (five-year suspension).

D. Respondent Has Not Satisfied the Requirements for Discipline To Be Imposed *Nunc Pro Tunc*.

Respondent asserts that any reciprocal discipline imposed should be imposed *nunc pro tunc*. *See* Response to Notice and Order (Respondent’s Pleadings Regarding Notice And Order, at 4) (stating “*In the Matter of Ronald S Goldberg*, 460 A.2d 982 (D.C. Ct. App. 1983); Response to Notice and Order (Respondent’s Further Pleadings And Errata Correction On His Petition To USPTO Director, at 2-3) (citing *Goldberg, supra*); Response to Notice and Order (Statement On

Grave Injustice, at 3 ¶ 7). However, the USPTO's rules permit concurrent reciprocal discipline only in very prescribed circumstances and, as noted below, Respondent's arguments do not sufficiently satisfy those requirements.

Upon request by a practitioner, "reciprocal discipline may be imposed *nunc pro tunc* only if the practitioner promptly notified the OED Director of his or her [disbarment] in another jurisdiction, and establishes by clear and convincing evidence that the practitioner voluntarily ceased all activities related to practice before the Office and complied with all provisions of § 11.58." 37 C.F.R. § 11.24(f). The provisions of 37 C.F.R. § 11.58 concern duties of disciplined practitioners and include, but are not limited to, requirements such as filing notices of withdrawal in each patent and trademark application pending before the USPTO and providing notices of the discipline to all State and Federal jurisdictions and to all clients. *See* 37 C.F.R. § 11.58(b)(1)(i) and (ii). Respondent carries the burden of proof to establish § 11.58 compliance by clear and convincing evidence. *See* 37 C.F.R. § 11.24(f). The USPTO Director regularly enforces the express terms of § 11.24(f) before applying reciprocal discipline *nunc pro tunc*. *See In re Levine*, Proceeding No. 2015-21 (USPTO, Aug. 1, 2016); *see also In re Plache*, Proceeding No. D2014-20, at 6 (USPTO, Sept. 24, 2014) (The USPTO Director refused to reciprocally apply a New York three-year suspension *nunc pro tunc* where the practitioner did not notify the OED Director of the suspension. The Final Order states that: "...voluntary cessation of practice before the USPTO alone has no legal effect on the imposition of reciprocal discipline.").

Respondent argues that it would be "unfair" and a "gross injustice" to impose an exclusion in this case, or at least to withhold *nunc pro tunc* treatment of any reciprocal discipline imposed, because it would subject him to an effective "10 year suspension," alternatively described as "double punishment," that will be a "deadly blow to all the efforts and planning that [respondent]

... has put to date for his after retirement income and life.” *See* Respondent’s Pleadings Regarding Notice And Order, at 4, 8; Respondent’s Further Pleadings And Errata Correction On His Petition To USPTO Director, at 2; Respondent’s Statement on Grave Injustice, at 1, 2 ¶¶ 3-4, 3 ¶ 10. Respondent adds that he “advertised his business as a patent consultant” and that if he is excluded he “will have to give up his added qualification of having both scientific and technical background along with legal degree of having earned a registered practitioner status before the USPTO.” Respondent’s Statement on Grave Injustice, at 3 ¶ 7. In contrast, the OED Director opposes *nunc pro tunc* discipline on the basis that Respondent did not provide the USPTO notice of his California discipline and did not cease practice before the Office. *See* OED Response, at 24.

First, it is undisputed that Respondent did not provide notice of his California State discipline to the USPTO. *See* Respondent’s Statement on Grave Injustice, at 5-6 ¶¶ 13-14. On that basis alone, Respondent’s request for *nunc pro tunc* treatment can be, and is, denied.

In addition to the failure to notify the USPTO of his California discipline, Respondent did not cease all practice before the USPTO. His own pleadings concede this point. For example, in his Declaration in Support of Petition to Dismiss, Respondent stated that “I ceased substantial patent and trademark practice as an attorney effective 5/17/2017.” *See* Respondent’s Pleadings Regarding Notice and Order (Sanjay Bhardwaj’s Declaration in Support of Petition to Dismiss ¶ 6). Similarly, at page 8 of Respondent’s Pleadings Regarding Notice and Order, he states “Practitioner has already ceased substantial parts of practice in patents since 5/17/2017.”⁵

However, the USPTO’s rules require that Respondent show he “voluntarily ceased *all activities*”

⁵ The OED Director’s Response sets forth a succinct summary of Respondent’s pleadings and representations in these reciprocal disciplinary proceedings wherein he represents that he only “substantially ceased” practice before the office. OED Response, at 11-12.

related to practice before the Office, not that he “substantially” ceased practice. 37 C.F.R. § 11.24(f) (emphasis added). By his own words, he has not done that. Additionally, however, the OED Director proffered evidence that Respondent continued to file new patent applications and submitted arguments in response to Office Actions during the period of his state disbarment. Specifically, at pages 13-14 of the OED Response, the OED Director provided a summary of Respondent’s various patent practice activities before the USPTO from 2017 through 2022, during the period of his California disbarment. As a result, not only are Respondent’s statements that he “substantially” ceased practice before the office not truthful, but Respondent has plainly failed to prove entitlement to *nunc pro tunc* reciprocal discipline since he did not cease all practice before the Office in accordance with § 11.24(f).

Insofar as Respondent relies on *In re Goldberg*, 460 A.2d 982, with regard to his “substantially ceased” argument, it is noted that Respondent also misstated and misapplied that case as it applies to *nunc pro tunc* treatment of discipline by the USPTO. As the OED Director correctly noted in his brief that, the *Goldberg* case does not govern USPTO Proceedings and, further, does not stand for the proposition for which Respondent proffered it. *See* OED Response at 29-30. *Goldberg* does not demand or even support *nunc pro tunc* treatment here. Rather, it anticipates that “concurrency will be the norm” and sets forth requirements, similar to those of the USPTO, that must be satisfied before receiving *nunc pro tunc* treatment. *See* 460 A.2d at 985 (stating that *nunc pro tunc* may be warranted “[i]f the attorney ‘promptly’ notifies Bar Counsel of any professional disciplinary action in another jurisdiction” and “voluntarily refrains from practicing law . . . during the period of suspension in the original jurisdiction”). Respondent does not satisfy those requirements, as already discussed, so his reliance on *Goldberg* is, at best, misguided and, at worst, deliberately misleading.

Finally, Respondent also has not provided any evidence of compliance with the various other provisions in 37 C.F.R. § 11.58, which sets forth the duties of a practitioner disciplined by the USPTO and include certain advertising activities; formally withdrawing from representation in all matters pending at the Office; providing notice of the discipline to legal jurisdictions, clients, and opposing parties; returning unearned fees and client property; and filing an affidavit and supporting evidence pertaining to various similar activities and recordkeeping. *See* 37 C.F.R. § 11.58(b)-(d); *see also In re Feuerborn*, Proceeding No. D2020-23, at 9-11 (USPTO, Dec. 21, 2020) (denying *nunc pro tunc* treatment for failure to demonstrate compliance with § 11.58). Respondents bear “the burden of proving compliance with *all* the requirements of [37 C.F.R.] § 11.58.” *In re Gitler*, Proceeding No. D2019-48, at 5 (USPTO, Aug. 11, 2020). Because of Respondent’s noncompliance with §§ 11.24 and 11.58, Respondent has failed to carry that burden.

Stated plainly, Respondent’s other arguments regarding the harshness of a reciprocal exclusion or the unfairness of “double punishment,” are irrelevant to the issue of *nunc pro tunc* treatment. *See, e.g., In re Haigh*, Proceeding No D2009-05, at 19 (USPTO Aug. 3, 2009) (“Loss of income naturally flows from a suspension and is always present when the Office considers suspending an attorney from the practice of law. Therefore, loss of income is not sufficient to establish, clearly and convincingly, a genuine issue of material fact that grave injustice would result from the imposition of reciprocal discipline.”); *see also, e.g., In re Feuerborn*, Proceeding No. D2020-23, at 11 (Respondent’s “claims of economic hardship are ... dismissed as irrelevant to the disciplinary case and the claims made ... [in this § 11.24 reciprocal proceeding].”). As a result, those arguments provide no basis for *nunc pro tunc* treatment here.

In sum, Respondent plainly failed to meet the conditions stated in USPTO's reciprocal discipline rule and, as a result, reciprocal discipline may not be imposed *nunc pro tunc* here.

E. Respondent's Other Arguments and Defenses Have No Merit.

In addition to his arguments under the *Selling* factors, Respondent raises a variety of other challenges to reciprocal discipline here. Respondent bears the burden of proving any affirmative defense by clear and convincing evidence. *See* 37 C.F.R. § 11.49. As noted below, however, Respondent has failed to satisfy his burden. His arguments have no merit and provide no basis to prevent the imposition of reciprocal discipline here.

1. **Failure To File Disciplinary Complaint Within One Year of Grievance.**

First, Respondent claims that, OED Director has not established a date when the grievance was received, only that it was received. *See* Response to Notice and Order (Respondent's Pleading Regarding Notice And Order, at 7). Curiously, Respondent also argues that the complaint is defective because the OED Director never even received grievance. Specifically, he argues that, to the extent that the OED Director relies on the reinstatement petition, that reinstatement petition cannot be a grievance. *See* Response to Notice and Order (Respondent's Further Pleadings And Errata, at 3). As noted below, these arguments have no merit.

The OED Director produced the grievance, an email from the State bar of California dated June 8, 2022, that formed the basis for these reciprocal disciplinary proceedings in opposing Respondent's Motion to Dismiss. It was again produced here with the certification accompanying Exhibit A-1 expressly stating that it "is a correct copy of the grievance received by OED and maintained in OED disciplinary investigation file number [REDACTED], pertaining to Sanjay Bhardwaj." *See* OED Response, Ex. A-1. Since a "grievance" can be "a written submission from any source received by the OED Director that presents possible grounds for

discipline of a specified practitioner,” this document is sufficient to be considered a grievance under the USPTO’s rules. *See* 37 C.F.R. § 11.1. Further, Respondent’s statements that the OED Director never received a grievance, when proof of such grievance was provided to him are plainly false. Finally, as the Disciplinary Complaint was filed on October 24, 2022, well within one year of receiving the June 8, 2022, as required by 37 C.F.R. § 11.34(d). Respondent’s arguments that the Complaint was not timely filed is without any merit.

2. Challenges to State Order.

Respondent next claims that the USPTO failed to attach a certified copy of the State order with the Notice and Order that he received from the USPTO. *See* Notice and Order (Respondent’s Pleading Regarding Notice And Order, at 5). He relatedly claims that the OED relied on uncertified orders from the State. *See id.* at 6. Respondent further argues that these purported “certification errors on purported orders from another jurisdiction have not been cured and cannot be cured through papers now filed by OED Director.” *See id.* (Respondent’s Further Pleadings and Errata Correction on His Petition to USPTO Director, at 3).

As the OED Director notes, Respondent does not dispute the State Order attached to the Notice and Order is accurate. Instead, his argument is that it is procedurally defective in that a certified copy of the order was required to be provided to him with the Notice and Order. This is incorrect. The reciprocal discipline rules require only that the OED Director “*obtain* a certified copy of the record or order regarding the ... disbarment...” 37 C.F.R. § 11.24(a) (emphasis added). On September 15, 2022, the OED Director obtained a certified copy of the order issued by the Supreme Court of California disbarring Respondent on January 2, 2020. *See* OED Response, Ex. A-2. That order establishes “a prima facie case by clear and convincing evidence” that Respondent was disbarred from the practice of law in California. *See* 37 C.F.R. § 11.24(a).

Lastly, contrary to Respondent's argument, the Notice and Order provided to practitioners under § 11.24(b) requires only that "[a] copy of the record or order regarding the public censure, public reprimand, probation, disbarment, suspension or disciplinary disqualification" accompany the Notice and Order. *See* 37 C.F.R. § 11.24(b)(1). The Director's October 26, 2022 Notice and Order provided Respondent with a copy of the certified disbarment order as is permissible by the rules. Thus, Respondent's arguments here provide no basis to prevent reciprocal discipline.

3. Reinstatement Eligibility Does Not Negate Reciprocal Discipline.

Next, Respondent claims that "[d]ue to pendency of reinstatement action in State Bar Court, the present order of Supreme Court dated 01/02/2020 is no longer final and its certification on 9/12/2022 does not establish that it is final order due to pendency of reinstatement action." *See* Response to Notice and Order (Respondent's Pleadings Regarding Notice and Order, at 2). He claims that "[t]he OED Director is late and untimely." *Id.* at 4. He also relies on the "Federal Rules of Civil Procedure Rule 12 (b) et. Seq." as support for this argument. *Id.* at 3.

Paraphrasing, Respondent seems to argue that, since he claims that he is now allegedly eligible for reinstatement, the complaint must be dismissed as untimely since the purpose of reciprocal discipline is not to double the effective time of suspension. *Id.* at 4.

As an initial matter, Respondent has not shown that he is eligible for reinstatement in California. Rule 5.442(B) of the Rules of Procedure of the State Bar of California states that "[e]xcept as provided in the order of disbarment, no petition for reinstatement will be filed within five years after the effective date of the petitioner's disbarment. . . ." Under this rule, Respondent must wait at least five years from the effective date of his disbarment, January 2, 2020, before he may petition for reinstatement to the State Bar of California. Although he represents he is "eligible" for reinstatement in his sworn declaration and his Response to Notice

and Order, he provides no evidence thereof. His representations are uncited and unsupported.⁶ While he does provide a Petition for Reinstatement filed on May 27, 2022, that is not evidence he is eligible for reinstatement, merely that he is requesting such action. *See* Respondent's Pleadings Regarding Notice And Order, Ex. A. Thus, his allegations that he is eligible for reinstatement are not credible and lack any factual support.

Even assuming that Respondent was eligible for reinstatement, Respondent provides no authority for his argument that pending reinstatement negates reciprocal discipline. That is for good reason because none exists. The rules governing reciprocal discipline provide no basis for negating or reducing reciprocal discipline based on reinstatement eligibility. Rather, the provisions of 37 C.F.R. § 11.24 require the imposition of "identical" reciprocal discipline unless a respondent makes a sufficient showing under 37 C.F.R. § 11.24(d)(1). Respondent has not made that showing here. Finally, to the extent that the Federal Rules of Civil Procedure can be read to permit this Respondent's conclusion, it is noted that those rules are not applicable here. *See Bender v. Dudas*, No. 04-cv-1301, 2006 WL 89831, at *23 (D.D.C. Jan. 13, 2006).

4. The Parties Are Permitted to Supplement the Record.

Respondent also complains that the OED Director is not permitted to "augment" the record in this matter. *See* Reply, at 1-2. However, this is incorrect. Not only does the USPTO Director possess authority to allow the parties to augment the record, 35 U.S.C. §§ 2(b)(2)(D) and 3(a)(2)(A), this is a long-established practice in contested reciprocal disciplinary proceedings. Further, both the OED Director and Respondent were permitted to do so and neither party was prejudiced by this allowance.

⁶ It is also noted that Petition for Reinstatement appears to reflect that fact he was disbarred in 2022, not some earlier date as he attempts to argue. *See* Respondent's Pleadings Regarding Notice And Order, Ex. A. Respondent does not explain this inconsistency. Nor does he credibly offer any evidence in support of a current reinstatement eligibility.

It is finally noted that Respondent's pleadings were poorly drafted and cited, difficult to understand, and replete with restatements of arguments already made throughout his various pleadings. It is the Respondent's duty to properly argue and support his claims. This burden will not be carried for him. *See Carpet Serv. Int'l, Inc. v. Chicago Reg'l Council of Carpenters*, No. 09-cv-1083, 2010 WL 234912, at *3 (N.D.Ill. 2010) (citing *Little v. Cox's Supermarkets*, 71 F.3d 637, 641 (7th Cir.1995) ("[J]ust as a district court is not required to scour the record looking for factual disputes, it is not required to scour the party's various submissions to piece together appropriate arguments. A court need not make the lawyer's case." (internal citation and quotation marks omitted))). To the extent that this Final Order does not specifically address each and every one of Respondent's arguments in the various pleadings that constitute his "Response to Notice and Order" and his Reply, those remaining claims are denied as irrelevant and unsupported.

ORDER

ACCORDINGLY, it is ORDERED that:

1. Respondent is excluded from the practice of patent, trademark, and other non-patent law before the USPTO, effective the date of this Final Order.
2. The OED Director publish a notice in the *Official Gazette* materially consistent with the following:

Notice of Exclusion

This notice concerns Sanjay Bhardwaj of Fremont, California, who is a registered patent attorney (Registration Number 65,999). In a reciprocal disciplinary proceeding, the Director of the United States Patent and Trademark Office ("USPTO") has ordered that Mr. Sanjay Bhardwaj be excluded from practice before the USPTO in patent, trademark, and other non-patent matters for violating 37 C.F.R. § 11.804(h), predicated upon being disbarred from the practice of law by a duly constituted authority of a State.

Sanjay Bhardwaj has been disbarred by the Supreme Court of California from the practice of law in California in view of the findings set forth in the State Bar Court of California Review Department's Opinion and Order (as modified on 5 June 2019) in Case No. 14-O-00848. The State Bar Court of California Review Department found Sanjay Bhardwaj culpable of three counts of failing to report judicial sanctions (Cal. Bus. & Prof. Code § 6068, subd. (o)(3)); two counts of failing to maintain respect due to the courts and judicial officers (§ 6068, subd. (b)); failing to maintain a just action (§ 6068, subd. (c)); failing to maintain the duty not to encourage action based on corrupt motive (§ 6068, subd. (g)); and moral turpitude (§ 6106).

This action is taken pursuant to the provisions of 35 U.S.C. § 32 and 37 C.F.R. § 11.24. Disciplinary decisions are available for public review at the Office of Enrollment and Discipline's FOIA Reading Room, located at: <https://foiadocuments.uspto.gov/oed/>;

3. The OED Director give notice pursuant to 37 C.F.R. § 11.59 of the public discipline and the reasons for the discipline to disciplinary enforcement agencies in the state(s) where Respondent is admitted to practice, to courts where Respondent is known to be admitted, and to the public;
4. Respondent shall comply with the duties enumerated in 37 C.F.R. § 11.58;
5. The USPTO dissociate Respondent's name from any Customer Numbers and USPTO verified Electronic System account(s), if any; and
6. Respondent shall not apply for a USPTO Customer Number, shall not obtain a USPTO Customer Number, nor shall he have his name added to a USPTO Customer Number, unless and until he is reinstated to practice before the USPTO.

Pursuant to 37 C.F.R. § 11.57(a), review of the final decision by the USPTO Director may be had by a Petition filed with the U.S. District Court for the Eastern District of Virginia under 35 U.S.C. § 32 “within thirty (30) days after the date of the order recording the Director’s action.” See E.D. Va. Local Civil Rule 83.5.

It is so ordered.

Date

Users, Berdan, Digitally signed by Users,
David Berdan, David
Date: 2023.04.11 17:01:36
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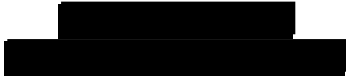
David Berdan
General Counsel
Office of the General Counsel
United States Patent and Trademark Office

on delegated authority by

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

CERTIFICATE OF SERVICE

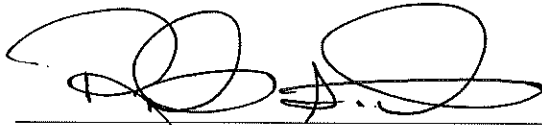
I hereby certify that the foregoing Final Order Pursuant To 37 C.F.R. § 11.24 was mailed by first-class certified mail, return receipt requested, on this day to the Respondent at the most recent address provided to the OED Director pursuant to 37 C.F.R. § 11.11(a):

Mr. Sanjay Bhardwaj


and to where the OED Director reasonably believes Respondent receives mail:

Mr. Sanjay Bhardwaj
Law Offices of Sanjay Bhardwaj
2030 Laurel Canyon Court
Fremont, California 94539-5974

4/12/2023
Date


United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450