

# EXHIBIT 28

**r, Robert**

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**From:** Collier, John [JohnCollier@icfi.com]  
**Date:** Tuesday, May 08, 2007 1:23 PM  
**To:** Bahr, Robert  
**Subject:** RE: AIPLA definition of "minimal complexity"

Bob.

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**From:** Bahr, Robert [mailto:Robert.Bahr@USPTO.GOV]  
**Date:** Tuesday, May 08, 2007 12:51 PM  
**To:** Collier, John  
**Subject:** RE: AIPLA definition of "minimal complexity"

spreadsheet shows the relationship between application generation (initial application through a tenth+ continuation/CIP) whether the application has 10 or fewer total claims or has more than 10 total claims.

Original Message-----

**From:** Collier, John [mailto:JohnCollier@icfi.com]  
**Date:** Monday, May 07, 2007 5:00 PM  
**To:** Bahr, Robert  
**Subject:** FW: AIPLA definition of "minimal complexity"

Bob,  
Can you provide us with data on the number/percent of continuations applicable to –  
a) "simple" applications, referenced by AIPLA as those applications having "10 page specification, 10 claims"; and  
b) applications that would NOT be affected by the claims requirements (i.e., < 15/75)  
If your answers are percentages, please specify the denominator (e.g., percent of all filings, percent of continuations).  
Thanks!

John

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**From:** Gormsen, Elizabeth  
**Date:** Monday, May 07, 2007 4:42 PM  
**To:** Collier, John  
**Subject:** AIPLA definition of "minimal complexity"

Re: the survey question that asks attorneys what their typical charge is for an original, non-provisional utility patent application for an invention of minimal complexity, AIPLA provides clarification of minimal complexity as follows: "(e.g., 10 page specification, 10 claims)"

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	Entity	Current Filing <= 10 Total Claims	Current Filing > 10 Total Claims
Initial Applications	Large	40,928	165,602
	Small	20,354	59,034
First CON/CIP	Large	4,270	14,629
	Small	2,218	8,826
Second CON/CIP	Large	1,071	3,355
	Small	499	2,089
Third CON/CIP	Large	435	1,157
	Small	206	737
Fourth CON/CIP	Large	231	544
	Small	64	347
Fifth CON/CIP	Large	126	286
	Small	49	172
Sixth CON/CIP	Large	71	153
	Small	18	87
Seventh CON/CIP	Large	53	97
	Small	19	42
Eighth CON/CIP	Large	19	43
	Small	10	24
Ninth CON/CIP	Large	18	40
	Small	6	13
Tenth + CON/CIP	Large	298	94
	Small	14	57
TOTALS	Large	47,520	186,000
	Small	23,457	71,428

\* assumed

ALL CONs/CIPs consecutively claimed.

Totals of Columns D & E <> totals of Column I due to different run dates.

The "Individual Cases" and "With NO CON/CIP" rows were completely updated and are consistent between these

e columns.