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Subject: U.S. TRADEMARK APPLICATION NO. 86321433 - THE PAVILION AT KING OF PRUSSIA - PSAC-0004US/ - EXAMINER BRIEF

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UNITED STATES PATENT AND TRADEMARK OFFICE (USPTO)

U.S. APPLICATION SERIAL NO. 86321433

MARK: THE PAVILION AT KING OF PRUSSIA



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GENERAL TRADEMARK INFORMATION:

<http://www.uspto.gov/trademarks/index.jsp>

TTAB INFORMATION:

<http://www.uspto.gov/trademarks/process/appeal/index.jsp>

APPLICANT: PS Court Associates, LP

CORRESPONDENT'S REFERENCE/DOCKET NO:

PSAC-0004US/

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EXAMINING ATTORNEY'S APPEAL BRIEF

Applicant has appealed the trademark examining attorney's final refusal to register the service mark THE PAVILION AT KING OF PRUSSIA in standard character form. Registration was refused under Section 2(d) of the Trademark Act, 15 U.S.C. Section 1052(d), on the grounds that the applicant's mark, when used in connection with the identified services, so resembles the marks shown in U.S. Registration Nos. 2892753, 2892752, and 2894595 as to be likely to cause confusion, to cause mistake, or to deceive.

FACTS

On June 26, 2014, applicant PS Court Associates, LP filed a used-based service mark application seeking registration on the Principal Register of the mark THE PAVILION AT KING OF PRUSSIA in standard character form for “Real estate services, namely, rental, leasing and management of commercial property, retail shops, restaurants, offices and office space.”

On October 9, 2014, the examining attorney issued a non-final Office Action. The examining refused registration under Trademark Act Section 2(d) on the grounds that the applicant’s mark, when used in connection with the identified services, so resembles the marks shown in U.S. Registration Nos. 2909667, 2892753, 2894594, 2892752, and 2894595 as to be likely to cause confusion, to cause mistake, or to deceive. The examining attorney also issued a refusal under Trademark Act Section 2(e)(2) on the grounds that the mark is primarily geographically descriptive of the identified services. The applicant also required that the applicant submit a substitute specimen or amend the filing basis to Section 1(b) and state the citizenship of the general partners of the applicant’s limited partnership.

The applicant responded to the Office Action on April 9, 2015. The applicant stated the citizenship of the general partners of the partnership, submitted a substitute specimen, argued against the refusal under Section 2(d), and submitted a claim of acquired distinctiveness to overcome the refusal under Section 2(e)(2). The applicant also submitted a disclaimer of the wording AT KING OF PRUSSIA.

On April 24, 2015, the examining attorney issued a final Office Action. The examining attorney made final the refusal under Section 2(d). The examining attorney also accepted the applicant’s claim of acquired distinctiveness under Section 2(f) and withdrew the refusal under Section 2(e)(2) and stated that the requirements with respect to the specimen and the applicant’s entity information were

satisfied. Finally, the examining attorney notified the applicant that they may withdraw the voluntary disclaimer of the wording AT KING OF PRUSSIA as it was not required on the Principal Register under Section 2(f) since this wording is not generic for the identified services.

The applicant noted the instant appeal on October 22, 2015 and filed a request for reconsideration. The applicant stated that U.S. Registration Nos. 2909667 and 2894594 had been canceled by the Office. The applicant also argued against the refusal under Section 2(d) with respect to the other cited marks. The examining attorney denied the applicant's request for reconsideration on October 2015. The examining attorney withdrew the refusal under Section 2(d) with respect to U.S. Registration Nos. 2909667 and 2894594 based on their cancelation by the Office and maintained the refusal under Section 2(d) with respect to U.S. Registration Nos. 2892753, 2892752, and 2894595.

The applicant filed its appeal brief on December 18, 2015. The file was forwarded to the examining attorney for statement on December 21, 2015.

ISSUE

Whether the applicant's mark, when used in connection with the identified services, so resembles the marks shown in U.S. Registration Nos. 2892753, 2892752, and 2894595 as to be likely to cause confusion, to cause mistake, or to deceive under Trademark Act Section 2(d).

ARGUMENT

THE MARKS OF THE APPLICANT AND THE REGISTRANT ARE CONFUSINGLY SIMILAR IN APPEARANCE, SOUND, MEANING AND OVERALL COMMERCIAL IMPRESSION AND THE SERVICES OF BOTH ARE IDENTICAL/CLOSELY RELATED CREATING A LIKELIHOOD OF CONFUSION OR MISTAKE UNDER SECTION 2(d) OF THE TRADEMARK ACT.

Trademark Act Section 2(d) bars registration where an applied-for mark so resembles a registered mark that it is likely, when applied to the services, to cause confusion, mistake or to deceive the potential consumer as to the source of the services. TMEP §1207.01. The Court in *In re E. I. du Pont de Nemours & Co.*, 476 F.2d 1357, 177 USPQ 563 (C.C.P.A. 1973), listed the principal factors to consider in determining whether there is a likelihood of confusion. Among these factors are the similarity of the marks as to appearance, sound, meaning and commercial impression, and the relatedness of the services. The overriding concern is to prevent buyer confusion as to the source of the services. *In re Shell Oil Co.*, 992 F.2d 1204, 1208, 26 USPQ2d 1687, 1690 (Fed. Cir. 1993). Therefore, any doubt as to the existence of a likelihood of confusion must be resolved in favor of the registrant. *In re Hyper Shoppes (Ohio), Inc.*, 837 F.2d 463, 6 USPQ2d 1025 (Fed. Cir. 1988); *Lone Star Mfg. Co. v. Bill Beasley, Inc.*, 498 F.2d 906, 182 USPQ 368 (C.C.P.A. 1974). Here, the marks of the parties are confusingly similar and the services are identical/closely related and are provided through the same channels of trade.

A. The Marks Are Confusingly Similar

In the case at hand, the applicant seeks registration of THE PAVILION AT KING OF PRUSSIA in standard character form for “Real estate services, namely, rental, leasing and management of commercial property, retail shops, restaurants, offices and office space.” The registrant’s marks, all owned by King of Prussia Associates, are THE PLAZA KING OF PRUSSIA in typed form for “shopping center services, namely, leasing and management of retail space,” KING OF PRUSSIA in typed form for “shopping center services, namely, leasing and management of retail space,” and THE COURT KING OF PRUSSIA in typed form for “shopping center services, namely, leasing and management of retail space.”

Marks are compared in their entireties for similarities in appearance, sound, connotation, and commercial impression. *Stone Lion Capital Partners, LP v. Lion Capital LLP*, 746 F.3d 1317, 1321, 110

USPQ2d 1157, 1160 (Fed. Cir. 2014) (quoting *Palm Bay Imps., Inc. v. Veuve Clicquot Ponsardin Maison Fondée En 1772*, 396 F. 3d 1369, 1371, 73 USPQ2d 1689, 1691 (Fed. Cir. 2005)); TMEP §1207.01(b)-(b)(v). “Similarity in any one of these elements may be sufficient to find the marks confusingly similar.” *In re Davia*, 110 USPQ2d 1810, 1812 (TTAB 2014) (citing *In re 1st USA Realty Prof’ls, Inc.*, 84 USPQ2d 1581, 1586 (TTAB 2007)); *In re White Swan Ltd.*, 8 USPQ2d 1534, 1535 (TTAB 1988)); TMEP §1207.01(b).

The applicant’s mark is highly similar to the registrant’s marks with respect to sound, appearance, and commercial impression. The marks share the wording KING OF PRUSSIA. Marks may be confusingly similar in appearance where similar terms or phrases or similar parts of terms or phrases appear in the compared marks and create a similar overall commercial impression. See *Crocker Nat’l Bank v. Canadian Imperial Bank of Commerce*, 228 USPQ 689, 690-91 (TTAB 1986), *aff’d sub nom. Canadian Imperial Bank of Commerce v. Wells Fargo Bank, Nat’l Ass’n*, 811 F.2d 1490, 1495, 1 USPQ2d 1813, 1817 (Fed. Cir. 1987) (finding COMMCASH and COMMUNICASH confusingly similar); *In re Corning Glass Works*, 229 USPQ 65, 66 (TTAB 1985) (finding CONFIRM and CONFIRMCELLS confusingly similar); *In re Pellerin Milnor Corp.*, 221 USPQ 558, 560 (TTAB 1983) (finding MILTRON and MILLTRONICS confusingly similar); TMEP §1207.01(b)(ii)-(iii).

Furthermore, while the marks must be compared in their entireties and should not be dissected, a trademark examining attorney may weigh the individual components of a mark to determine its overall commercial impression. *Stone Lion Capital Partners, LP v. Lion Capital LLP*, 746 F.3d 1317, 1322, 110 USPQ2d 1157, 1161 (Fed. Cir. 2014) (“[Regarding the issue of confusion,] there is nothing improper in stating that . . . more or less weight has been given to a particular feature of a mark, provided the ultimate conclusion rests on consideration of the marks in their entireties.”) (quoting *In re Nat’l Data Corp.*, 753 F.2d 1056, 1058, 224 USPQ 749, 751 (Fed. Cir. 1985))). Thus, since the applicant’s mark and the registrant’s marks share the wording KING OF PRUSSIA, the overall commercial impressions of the marks are highly similar.

Moreover, with respect to the cited registered mark KING OF PRUSSIA, the applicant has merely added the wording THE PAVILION AT to the registrant's mark. Adding a term to a registered mark generally does not obviate the similarity between the compared marks, as in the present case, nor does it overcome a likelihood of confusion under Section 2(d). *See Coca-Cola Bottling Co. v. Jos. E. Seagram & Sons, Inc.*, 526 F.2d 556, 557, 188 USPQ 105, 106 (C.C.P.A. 1975) (finding BENGAL and BENGAL LANCER and design confusingly similar); *In re Toshiba Med. Sys. Corp.*, 91 USPQ2d 1266, 1269 (TTAB 2009) (finding TITAN and VANTAGE TITAN confusingly similar); *In re El Torito Rests., Inc.*, 9 USPQ2d 2002, 2004 (TTAB 1988) (finding MACHO and MACHO COMBOS confusingly similar); TMEP §1207.01(b)(iii). In the present case, the marks are identical in part.

The applicant argues that a likelihood of confusion does not exist because the wording shared by the applicant's mark and the registrant's marks is a geographic term. King of Prussia is "...a census-designated place in Upper Merion Township, Montgomery County, Pennsylvania." (10/09/2014 Office Action – pp. 50-54) The applicant is located there and the registrant's services originate there. Thus, the applicant is correct in stating that this shared wording is geographically descriptive. However, the Court of Appeals for the Federal Circuit and the Trademark Trial and Appeal Board have recognized that marks or terms deemed "weak" or merely descriptive are still entitled to protection against the registration by a subsequent user of a similar mark for closely related services. TMEP §1207.01(b)(ix); *see King Candy Co. v. Eunice King's Kitchen, Inc.*, 496 F.2d 1400, 1401, 182 USPQ 108, 109 (C.C.P.A. 1974) (likelihood of confusion is "to be avoided, as much between 'weak' marks as between 'strong' marks, or as between a 'weak' and 'strong mark'"); *In re Colonial Stores, Inc.*, 216 USPQ 793, 795 (TTAB 1982) ("even weak marks are entitled to protection against registration of similar marks"). Thus, while the registrant's marks contain the weak term KING OF PRUSSIA, these marks are still entitled to protection against the registration by a subsequent user of a similar mark for closely related services. The applicant's mark, THE PAVILION AT KING OF PRUSSIA, is highly similar to the registrant's marks and the services provided

by the applicant and the registrant are identical/closely related. Therefore, a likelihood of confusion exists in this case.

Additionally, while the wording shared by the marks is geographically descriptive, the geographic location that is present in all of the marks, King of Prussia, Pennsylvania, is most known for its large shopping complex where the applicant's services and the registrant's services are provided. The evidence from Wikipedia in the October 9, 2014 non-final Office Action notes the following about King of Prussia, Pennsylvania and King of Prussia Mall:

King of Prussia is home to the King of Prussia Mall, the largest shopping complex in the United States, based on shopping area square footage. (The Mall of America in Bloomington, Minnesota, is the largest when theme park square footage is included.) King of Prussia comprises two malls "connected" by a 300-foot covered crosswalk, originally developed and operated by Kravco Company, now owned and managed by Simon Property Group.

The Plaza at King of Prussia originally opened in 1960, and was under a continual expansion until 1968. The Court at King of Prussia, comprising 900,000 square feet (84,000 m²) GLA connected by an open-air walkway to The Plaza, opened in 1981. The Plaza was renovated and expanded between 1991 and 1996, to include nearly 1,900,000 square feet (180,000 m²) GLA. The Court was renovated during 1996. The complex is undertaking a massive expansion to connect the buildings under one roof for the first time. This expansion is expected to be complete in the fall of 2016.

When the 180,000-square-foot (17,000 m²) Strawbridge's department store at the far end of the Court became vacant in the late 1990s, the original Kravco partners bought the building. Kravco Company re-tenanted it with big-box stores and restaurants such as The Cheesecake Factory, reducing GLA slightly, renaming that portion of The Court "The Pavilion."

Articles from the online Wikipedia® encyclopedia may be used to support a refusal or requirement, provided that an applicant has an opportunity to rebut such evidence. *See In re IP Carrier Consulting Grp.*, 84 USPQ2d 1028, 1032 (TTAB 2007); TBMP §1208.03; TMEP §710.01(b). Thus, while the wording shared by the marks is geographically descriptive of the identified services, the case at hand differs from

the cases cited by the applicant in that this geographic location is known almost entirely for the services provided by the applicant and the registrant and the services being provided by the parties are being provided within the same shopping complex that is located in King of Prussia, PA. As such, consumers are likely to be confused as to the source of the identified services. When comparing marks, the test is not whether the marks can be distinguished in a side-by-side comparison, but rather whether the marks are sufficiently similar in terms of their overall commercial impression that confusion as to the source of the services offered under the respective marks is likely to result. *Midwestern Pet Foods, Inc. v. Societe des Produits Nestle S.A.*, 685 F.3d 1046, 1053, 103 USPQ2d 1435, 1440 (Fed. Cir. 2012); *In re Davia*, 110 USPQ2d 1810, 1813 (TTAB 2014); TMEP §1207.01(b). The proper focus is on the recollection of the average purchaser, who retains a general rather than specific impression of trademarks. *United Global Media Grp., Inc. v. Tseng*, 112 USPQ2d 1039, 1049, (TTAB 2014); *L'Oreal S.A. v. Marcon*, 102 USPQ2d 1434, 1438 (TTAB 2012); TMEP §1207.01(b).

The applicant also argues that a likelihood of confusion does not exist in this case because the wording KING OF PRUSSIA is used by numerous businesses in the King of Prussia, Pennsylvania area that are able to coexist without consumer confusion and that there has been no actual consumer confusion in the marketplace. However, none of the marks cited by the applicant are marks that are registered as trademarks or service marks with the Office. Moreover, there is no evidence to show that these businesses coexist without any type of agreement to avoid confusion amongst their consumers. For example, two of the marks listed by the applicant, JC Penney at King of Prussia Plaza and Norman's Hallmark at King of Prussia Plaza, likely use the King of Prussia Plaza service mark in their name under the terms of their lease agreement with the King of Prussia Plaza shopping mall. Finally, the test under Trademark Act Section 2(d) is whether there is a likelihood of confusion. It is not necessary to show actual confusion to establish a likelihood of confusion. *Herbko Int'l, Inc. v. Kappa Books, Inc.*, 308 F.3d 1156, 1165, 64 USPQ2d 1375, 1380 (Fed. Cir. 2002) (citing *Giant Food, Inc. v. Nation's Foodservice, Inc.*,

710 F.2d 1565, 1571, 218 USPQ 390, 396 (Fed. Cir. 1983)); TMEP §1207.01(d)(ii). The Trademark Trial and Appeal Board stated as follows:

[A]pplicant's assertion that it is unaware of any actual confusion occurring as a result of the contemporaneous use of the marks of applicant and registrant is of little probative value in an ex parte proceeding such as this where we have no evidence pertaining to the nature and extent of the use by applicant and registrant (and thus cannot ascertain whether there has been ample opportunity for confusion to arise, if it were going to); and the registrant has no chance to be heard from (at least in the absence of a consent agreement, which applicant has not submitted in this case).

In re Kangaroos U.S.A., 223 USPQ 1025, 1026-27 (TTAB 1984).

Given the fact that the applicant's mark and the registrant's marks are highly similar with respect to sound, appearance, and commercial impression and that the applicant's mark and the registrant's marks share the wording KING OF PRUSSIA, which helps in creating a commercial impression in the minds of consumers even given its geographically descriptive nature, the marks are sufficiently similar to cause a likelihood of confusion in the marketplace under Trademark Act Section 2(d).

B. The Services Of The Parties Are Identical/Closely Related And Are Provided Through the Same Channels Of Trade

The services of the parties need not be identical or even competitive to find a likelihood of confusion. *See On-line Careline Inc. v. Am. Online Inc.*, 229 F.3d 1080, 1086, 56 USPQ2d 1471, 1475 (Fed. Cir. 2000); *Recot, Inc. v. Becton*, 214 F.3d 1322, 1329, 54 USPQ2d 1894, 1898 (Fed. Cir. 2000) (“[E]ven if the services in question are different from, and thus not related to, one another in kind, the same

services can be related in the mind of the consuming public as to the origin of the services.”); TMEP §1207.01(a)(i).

The respective services need only be “related in some manner and/or if the circumstances surrounding their marketing [be] such that they could give rise to the mistaken belief that [the services] emanate from the same source.” *Coach Servs., Inc. v. Triumph Learning LLC*, 668 F.3d 1356, 1369, 101 USPQ2d 1713, 1722 (Fed. Cir. 2012) (quoting *7-Eleven Inc. v. Wechsler*, 83 USPQ2d 1715, 1724 (TTAB 2007)); TMEP §1207.01(a)(i).

In the final Office Action dated April 24, 2015, the trademark examining attorney provided evidence from the USPTO’s X-Search database consisting of a number of third-party marks registered for use in connection with the same or similar services as those of both applicant and registrant in this case. This evidence shows that the services listed therein are of a kind that may emanate from a single source under a single mark. *See In re Aquamar, Inc.*, 115 USPQ2d 1122, 1126 n.5 (TTAB 2015) (citing *In re Mucky Duck Mustard Co.*, 6 USPQ2d 1467, 1470 n.6 (TTAB 1988)); *In re Albert Trostel & Sons Co.*, 29 USPQ2d 1783, 1785-86 (TTAB 1993); TMEP §1207.01(d)(iii). This evidence included the following examples:

- STEAMBOAT (U.S. Registration No. 4187376) with a design element for “Real estate services, namely, rental, brokerage, leasing and management of residential and commercial property, offices and office space; real estate services, namely, brokerage and leasing of real estate.”
- A triangle design element (U.S. Registration No. 4067079) for “real estate services, namely, rental, leasing, and management of commercial property, offices, and office space.”

- V VIERA COMMERCIAL PROPERTIES (U.S. Registration No. 4440617) with a design element for “Commercial real estate management and consulting services related thereto; management of shopping centers, office complexes, recreational properties, commercial properties and residential communities; real estate consulting for shopping centers, office complexes, recreational properties, commercial properties, and residential communities; real estate commercial brokerage and commercial real estate agency services; real estate leasing and rental services, namely, rental of commercial property; evaluation of real estate; real estate financing services.”
- MEDICAL & HEALTHCARE REAL ESTATE (U.S. Registration No. 4081522) in stylized form for “Real estate brokerage; Real estate consultancy; Real estate listing; Real estate management consultation; Real estate services, namely, rental, brokerage, leasing and management of commercial property, offices and office space.”
- UMG UPPER MANAGEMENT GROUP (U.S. Registration No. 4196902) with a design element for “Real estate services, namely, rental, brokerage, leasing and management of residential property, commercial property, offices and office space.”

Furthermore, in the final Office Action dated April 24, 2015, the examining attorney provided Internet evidence consisting of the websites of entities that provide the applicant’s services and the registrant’s services. This evidence establishes that the same entity commonly provides the relevant services and markets the services under the same mark and that the relevant services are sold or provided through the same trade channels and used by the same classes of consumers in the same fields of use. Therefore, applicant’s and registrant’s services are considered related for likelihood of confusion purposes. *See, e.g., In re Davey Prods. Pty Ltd.*, 92 USPQ2d 1198, 1202-04 (TTAB 2009); *In re Toshiba Med. Sys. Corp.*, 91 USPQ2d 1266, 1268-69, 1271-72 (TTAB 2009). Examples of this evidence includes the following:

- The examining attorney provided evidence from the website for Oak Court Mall, which leases and manages commercial property, retail shops, and restaurants.
- The examining attorney provided evidence from the website for Northbrook Court, which leases and manages commercial property, retail shops, and restaurants.
- The examining attorney provided evidence from the website for Plaza at Landmark, which leases and manages commercial property, retail shops, restaurants, and office space.
- The examining attorney provided evidence from the website for Beltway Plaza Mall, which leases and manages commercial property, retail shops, and restaurants.
- The examining attorney provided evidence from the website for The Pavilion at Port Orange, which leases and manages commercial property, retail shops, and restaurants.

Evidence obtained from the Internet may be used to support a determination under Section 2(d) that services are related. *See, e.g., In re G.B.I. Tile & Stone, Inc.*, 92 USPQ2d 1366, 1371 (TTAB 2009); *In re Paper Doll Promotions, Inc.*, 84 USPQ2d 1660, 1668 (TTAB 2007). The Internet has become integral to daily life in the United States, with Census Bureau data showing approximately three-quarters of American households used the Internet in 2013 to engage in personal communications, to obtain news, information, and entertainment, and to do banking and shopping. *See In re Nieves & Nieves LLC*, 113 USPQ2d 1639, 1642 (TTAB 2015) (taking judicial notice of the following two official government publications: (1) Thom File & Camille Ryan, U.S. Census Bureau, Am. Cmty. Survey Reports ACS-28, *Computer & Internet Use in the United States: 2013* (2014), available at <http://www.census.gov/content/dam/Census/library/publications/2014/acs/acs-28.pdf>, and (2) The Nat'l Telecomms. & Info. Admin. & Statistics Admin., *Exploring the Digital Nation: America's Emerging Online Experience* (2013), available at http://www.ntia.doc.gov/files/ntia/publications/exploring_the_digital_nation_-

[americas_emerging_online_experience.pdf](#)). Thus, the widespread use of the Internet in the United States suggests that Internet evidence may be probative of public perception in trademark examination.

Finally, where the services of an applicant and registrant are identical or virtually identical, the degree of similarity between the marks required to support a finding of likelihood of confusion is not as great as in the case of diverse services. See *United Global Media Grp., Inc. v. Tseng*, 112 USPQ2d 1039, 1049 (TTAB 2014) (quoting *Century 21 Real Estate Corp. v. Century Life of Am.*, 970 F.2d 874, 877, 23 USPQ2d 1698, 1701 (Fed. Cir. 1992)); TMEP §1207.01(b).

The applicant argues that a likelihood of confusion does not exist between the marks because the consumers of the applicant's and the registrant's services are sophisticated purchasers that will take great care when making purchasing decisions and, therefore, will not be confused. However, the Federal Court of Appeals for the Federal Circuit and the Trademark Trial and Appeal Board have held that the fact that purchasers are sophisticated or knowledgeable in a particular field does not necessarily mean that they are sophisticated or knowledgeable in the field of trademarks or immune from source confusion. TMEP §1207.01(d)(vii); see, e.g., *Stone Lion Capital Partners, LP v. Lion Capital LLP*, 746 F.3d. 1317, 1325, 110 USPQ2d 1157, 1163-64 (Fed. Cir. 2014); *Top Tobacco LP v. N. Atl. Operating Co.*, 101 USPQ2d 1163, 1170 (TTAB 2011).

CONCLUSION

For the foregoing reasons, the refusal to register under Section 2(d) of the Trademark Act, 15 U.S.C. Section 1052(d), on the grounds that the applicant's mark, when used in connection with the identified services, so resembles the marks shown in U.S. Registration Nos. 2892753, 2892752, and 2894595, as to be likely to cause confusion, to cause mistake, or to deceive, should be affirmed.

Respectfully submitted,

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