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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	86447383
Applicant	Mannatech, Incorporated
Applied for Mark	NUTRIVERUS
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Date	05/11/2016

**EIN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In re:	Trademark Application of Mannatech, Incorporated	§ § §	Law Office:	116
Serial No.:	86/447,383	§ § §	Examining Attorney:	Tamara Frazier
Filed:	November 6, 2014	§ § §	Attorney Docket No.:	1002.0006
For:	NUTRIVERUS & Design	§		



APPLICANT'S REPLY BRIEF

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APPLICANT’S REPLY BRIEF

Applicant, Mannatech, Incorporated (hereinafter “Applicant”), respectfully submits the subject Reply Brief in response to the Examining Attorney’s Appeal Brief, filed April 21, 2016.

I. ISSUES

This Reply Brief addresses the following points:

- A) Comparison of the Marks Must be Based on the Marks in their Entireties.
- B) Dissimilarity of Goods and Channel of Trade.
- C) Sophistication of Purchases Does Overcome any Likelihood of Confusion.
- D) Number and Nature of Similar Marks.
- E) Cases Which May be Cited.

II. ARGUMENT

A) **Comparison of the Marks Must be Based on the Marks in Their Entireties.**

Although the Examiner states that marks are compared in their entireties in appearance, sound, connotation and commercial impression¹, the Examiner continues to improperly dissect and assign an improper dominant feature to Applicant's Mark.

To begin, the Examiner states that the dominant feature of both Applicant's Mark and Registrant's Mark is "VERUS" prefaced with the similar terms "NU"/"NUTRI."² The Examiner has not demonstrated any evidence throughout the file history that the terms "NU" and "NUTRI" are in fact considered similar terms. Instead, the Examiner makes a blanket statement in the Examiner's Appeal Brief that "...the similar word 'NU', which would likely be perceived as a shortened version of "NUTRI" and/or new product within the same family of goods." The countless dictionary exhibits cited by both Applicant and Examiner for "nutri" and variations of the word "nutrition" do not define "NU" as being related or in any way similar or an abbreviation of "nutrition" or "nutri". Further, the Examiner has offered no proof that the term "NU" means or could be perceived as "new". Whereas, Applicant has offered that the term "NU" is definitive of the Greek letter "N"³. EXHIBIT A⁴ submits a proper definition of the term "NU". Thus, the

¹ Examiner's Appeal Brief, page 2, Section (A)1

² Examiner's Appeal Brief, page 2, Section (A)1

³ Applicant's Response to Final Action, page 4.

⁴ Exhibit A: Screen Print of merriam-webster.com's definitions of "nu". The Trademark Trial and Appeal Board may take judicial notice of definitions obtained from dictionaries that (1) are available in a printed format, (2) are the electronic equivalent of a print reference work, or (3) have regular fixed editions. TBMP §1208.04. *See* Fed. R. Evid. 201; 37 C.F.R. §2.122(a); *In re Dietrich*, 91 USPQ2d 1622, 1631 n.15 (TTAB 2009) (taking judicial notice of definition from Merriam-Webster Online Dictionary at www.merriam-webster.com); *In re Petroglyph Games Inc.*, 91 USPQ2d 1332, 1334 n.1 (TTAB 2009) (taking judicial notice of definition from Dictionary.com because it was from The Random House Unabridged Dictionary); *In re Red Bull GmbH*, 78 USPQ2d 1375, 1378 (TTAB 2006) (taking judicial notice of definition from Encarta Dictionary because it was readily available in specifically denoted editions via the Internet and CD-ROM); TMEP §710.01(c).

Examiner's statement that "NU" and "NUTRI" are similar can be completely discounted as there has been no proof that consumers perceive these texts to be similar.

With regards to the term "VERUS", Applicant's Mark has been improperly dissected. Applicant's Mark forms a new, single, fanciful word "nutriverus". This word should be viewed as a whole and not dissected into two terms "NUTRI" and "VERUS". *See China Healthways Institute, Inc. v. Wang*, 491 F.3d 1337, 1340, 83 USPQ2d 1123, 1125 (Fed. Cir. 2007) ("It is incorrect to compare marks by eliminating portions thereof and then simply comparing the residue."); *In re Shell Oil Co.*, 992 F.2d 1204, 1206 (Fed. Cir. 1993) ("Marks are considered in their entireties, words and design."); *In re Nat'l Data Corp.*, 753 F.2d 1056, 1058 (Fed. Cir. 1985) ("[L]ikelihood of confusion cannot be predicated on dissection of a mark, that is, on only part of a mark."); *Franklin Mint Corp. v. Master Mfg. Co.*, 667 F.2d 1005, 212 USPQ 233, 234 (C.C.P.A. 1981) ("It is axiomatic that a mark should not be dissected and considered piecemeal; rather, it must be considered as a whole in determining likelihood of confusion.")

NUTRIVERUS becomes a fanciful term, as it cannot be readily defined. *See* TMEP § 1209.01(a) ("Fanciful marks comprise terms that have been invented for the sole purpose of functioning as a trademark or service mark. Such marks comprise words that are either unknown in the language (e.g., PEPSI, KODAK, and EXXON) or are completely out of common usage (e.g., FLIVVER).") Simply because the word begins with a prefix, such as "NUTRI", does not give the Examiner leave to dissect the word. By definition, the addition of a "prefix" to the beginning of a word, changes it into a new word with new meaning.⁵ Since the addition of the

⁵ Exhibit B: Screen Print of merriam-webster.com's definitions of "prefix". The Trademark Trial and Appeal Board may take judicial notice of definitions obtained from dictionaries that (1) are available in a printed format, (2) are the electronic equivalent of a print reference work, or (3) have regular fixed editions. TBMP §1208.04. *See* Fed. R. Evid. 201; 37 C.F.R. §2.122(a); *In re Dietrich*, 91 USPQ2d 1622, 1631 n.15 (TTAB 2009) (taking judicial notice of definition from Merriam-Webster Online Dictionary at www.merriam-webster.com); *In re Petroglyph Games Inc.*, 91 USPQ2d 1332, 1334 n.1 (TTAB 2009)

term “NUTRI” forms a new word, how can it then be dissected into individual pieces? When considered in its entirety, “NUTRI” is no less significant than the term “VERUS”.

Further, Applicant has offered as evidence several United States Registrations using the term “NUTRI” to demonstrate that the term is not descriptive in the eyes of the United States Trademark Office.⁶ TMEP 1207.01(d)(iii) states: “...third-party registrations may be relevant to show that a mark or a portion of a mark is descriptive, suggestive, or so commonly used that the public will look to other elements to distinguish the source of the goods or services. *See, e.g., In re Hartz Hotel Servs., Inc.*, 102 USPQ2d 1150, 1153-54 (TTAB 2012); *In re Melville Corp.*, 18 USPQ2d 1386, 1388 (TTAB 1991); *In re Dayco Products-Eagle Motive Inc.*, 9 USPQ2d 1910, 1911-12 (TTAB 1988); *Plus Prods. v. Star-Kist Foods, Inc.*, 220 USPQ 541, 544 (TTAB 1983).” In the Examiner’s Denial for Request for Reconsideration, the Examiner states: “However, all but one of the referenced examples third party registrations are one-word. As such, ‘nutri’ would not need to be disclaimed in such cases.” By the Examiner’s own admission, “NUTRI” should not be disclaimed or dissected. Therefore, “NUTRI” is not descriptive, as claimed by the Examiner in previous actions. As “NUTRI” is not descriptive, the mark cannot be dissected. Consumers must view the mark as a whole in order to distinguish the source of goods.

Further, Registrant’s Mark and Applicant’s Mark create separate commercial impressions. It is agreed that both marks contain both words and designs. However, Registrant’s design is so highly stylized in color and design that it simply would not produce to the words “NU VERUS”. In a composite mark, the word portion is not always considered the dominant feature. *See In re*

(taking judicial notice of definition from Dictionary.com because it was from The Random House Unabridged Dictionary); *In re Red Bull GmbH*, 78 USPQ2d 1375, 1378 (TTAB 2006) (taking judicial notice of definition from Encarta Dictionary because it was readily available in specifically denoted editions via the Internet and CD-ROM); TMEP §710.01(c).

⁶ EXHIBIT D of Applicant’s Response to Non-Final Office Action and Final Office Action.

Viterra Inc., 671 F.3d 1358, 1362 (Fed. Cir. 2012) (“There is no general rule that the letter portion of the mark will form the dominant portion of the mark.”); *In re Electrolyte Labs., Inc.*, 929 F.2d 645, 647 (Fed. Cir. 1990) (“There is no general rule as to whether letters or design will dominate in composite marks; nor is the dominance of letters or design dispositive of the issue. No element of a mark is ignored simply because it is less dominant, or would not have trademark significance if used alone.”). The Marks must therefore be considered on a case-by-case basis. In the instant case, the Registrant’s large mortar and pestle design joins with the large word “NU” and is completely separate from the word “VERUS” written in a much smaller font.

The color black is also a very dominant feature of the Registrant’s Mark with respect to commercial impression. Color marks are specifically used to tie color into the association of a mark with the source of goods. The Examiner twists Applicant’s argument by stating that “...Applicant’s Mark is presented in very little stylization with no color claim. Therefore, it can be presented in any color and background including that which appears in the cited registration.”⁷ Applicant noted the color and background of Registrant’s Mark to demonstrate that the color is a dominant feature of the Registration in addition to other dominant features. As stated by the Examiner, dominant features are imprinted in the mind of the consumer. Put plainly, the Marks create different commercial impressions in the mind of the consumer as the Registrant has associated black with a green mortar and pestle to indicate the source of goods. Applicant’s mark does not and cannot boast such features.



⁷ Examiner’s Appeal Brief page 4.

Therefore, when the marks are correctly viewed in their entireties with the proper dominant features noted, there is no likelihood of confusion.

B) Dissimilarity of Goods and Channel of Trade.

Applicant's goods are only sold through a multi-level marketing program. This is not the same as a retail store or internet website as demonstrated by the Examiner. The associates/distributors/sponsors specifically educate and market the Applicant's products to consumers. Multi-level marketing programs are so extremely different from other channels of trade in that there is greater care in distinguishing the source of goods. Thus, avoidance of any confusion by consumers is inherent. These two products will never appear side by side on a shelf, on the same website for sale over the internet, nor would the products appear in back-to-back advertisement campaigns such as television or print. The conditions surrounding their marketing are such that the marks are not likely to be encountered by the same persons and would not lead to the mistaken belief that they originate from the same source.

The dissimilarity of established, likely-to-continue trade channels is directly tied to the conditions under which and buyers to whom sales are made, i.e., "'impulse' vs. careful, sophisticated purchasing." *See* TMEP §1207.01(d)(vii).

C) Sophistication of Purchases Does Overcome Any Likelihood of Confusion.

The Examiner makes argument that sophisticated purchasers are not immune from source confusion and that "...upon the average consumer encountering the similar terms "NUTRIVERUS" and "NU VERUS", both for supplements provided within a multi-level marketing capacity, there will be a likelihood of confusion."⁸ The Examiner fails to acknowledge that products offered within a multi-level marketing capacity are specifically defined by the

⁸ Examiner's Appeal Brief page 5.

company presenting the products. Multi-level marketers specifically educate consumers on both the company itself and the products in hopes of building their own business by recruiting their customers to sell product to other consumers. Thus, consumers would not be bombarded by these products without a specific marketer to also demonstrate the aspects of the business and company. *See* TMEP §1207.01(d)(vii) "...circumstances suggesting care in purchasing may tend to minimize the likelihood of confusion. *See, e.g., In re N.A.D., Inc.*, 754 F.2d 996, 999-1000, 224 USPQ 969, 971 (Fed. Cir. 1985) (concluding that, because only sophisticated purchasers exercising great care would purchase the relevant goods, there would be no likelihood of confusion merely because of the similarity between the marks NARCO and NARKOMED); *In re Homeland Vinyl Prods., Inc.*, 81 USPQ2d 1378, 1380, 1383 (TTAB 2006)."

Again, Applicant's goods are specifically designed for sale by independent distributors in a multi-level marketing program, as described above. The general public cannot purchase the NUTRIVERUS & Design product any other way. Further, the decision to purchase these goods is not made in haste, as a consumer is evaluating and purchasing for their own health needs.

No likelihood of confusion can exist between Applicant's Mark and the cited registration as the purchasers of NUTRIVERUS & Design are well educated and informed solely by independent distributors/associates/sponsors of a specifically designed multi-level marketing program. The sophistication of purchasers, coupled with the expense of the goods and care that purchasers exercise in selecting the particular goods, can reduce the likelihood of confusion and result in the registration of what otherwise might be similar marks. *See In re Digirad Corp.*, 45 U.S.P.Q.2d 1841, 1844 (T.T.A.B. 1998) ("DIGIRAY" and "DIGIRAD" not likely to be confused, primarily due to sophistication of consumers and care that consumers displayed in purchasing goods); *Electronic Design & Sales, Inc. v. Electronic Data Sys. Corp.*, 954 F.2d 713, 717 (C.C.P.A.

1969) ("EDS" and "E.D.S." not likely to cause confusion due primarily to sophistication of purchasers and care with which consumers purchase both parties' goods).

D) Number and Nature of Similar Marks.

The Applicant has painstakingly demonstrated a large number of third party registrations showing the coexistence of marks containing the wording "NU" versus "NUTRI" for similar goods and services as the Applicant's and Registrant's trademark, i.e., nutritional supplements, vitamins, minerals, etc. The Examiner has dismissed these registrations as offering "little evidentiary value"⁹ and that the registrations do not "obviate likelihood of confusion".

First of all, and as stated earlier in this brief, third party registrations may be relevant to show that a mark or a portion of a mark is descriptive, suggestive, or so commonly used that the public will look to other elements to distinguish the source of the goods or services. *See* TMEP §1207.01(d)(iii). *See, e.g., In re Hartz Hotel Servs., Inc.*, 102 USPQ2d 1150, 1153-54 (TTAB 2012); *In re Melville Corp.*, 18 USPQ2d 1386, 1388 (TTAB 1991); *In re Dayco Products-Eagle Motive Inc.*, 9 USPQ2d 1910, 1911-12 (TTAB 1988); *Plus Prods. V. Star-Kist Foods, Inc.*, 220 USPQ 541, 544 (TTAB 1983). The third party registrations submitted by the Applicant demonstrate that (1) NUTRI is not descriptive; (2) NUTRIVERUS cannot be dissected; and (3) the term "NU" is not related to "NUTRI" otherwise these marks could not coexist.

Further, the Examiner discounts the evidence of third party registrations containing NU/NUTRI as the marks appear to be combined with "highly suggestive/descriptive wording". Although Applicant has identified the marks that contain arbitrary terms such as "BEARS", "GREEN", "SOURCE", "TEK", and "ONE",¹⁰ the Examiner refuses to comment or diffuse the existence of such marks. Thus, the Examiner concedes that it is possible to have peacefully

⁹ Examiner's Brief page 6, Section (D).

¹⁰ Applicant's Appeal Brief and prior Office Action Responses.

coexisting marks containing “NU” or “NUTRI” with an arbitrary term, such as “VERUS”. Therefore, Applicant’s and Registrant’s marks can peacefully coexist.

Additionally, the nature and number of marks is part of the *du Pont* factors set out in *In re E.I. du Pont de Nemours & Co.*, 476 F.2d 1357, 177 USPQ 563 (CCPA 1973). *See du Pont* Factor No. 6 “The number and nature of similar marks in use on similar goods.” Thus, the Examiner cannot discredit the number and nature of similar marks used on similar goods that contain both “NU” and “NUTRI” along with a common shared word. As the market place appears to be saturated with trademarks embodying “NU” and “NUTRI” for similar goods/services sharing a common word, it stands to reason that purchases will look to other elements to distinguish the source of goods, such as marketing practices, as discussed earlier in this brief. *See Palm Bay Imports, Inc. v. Veuve Clicquot Ponsardin Maison Fondée En 1772*, 396 F.3d 1369, 1372 (Fed. Cir. 2005) (citing J. THOMAS MCCARTHY, 2 MCCARTHY ON TRADEMARKS AND UNFAIR COMPETITION § 11:88 (4th ed. 2001) (“[e]vidence of widespread third party use, in a particular field, of marks containing a certain shared term is competent to suggest that purchasers have been conditioned to look to the other elements of the marks as a means of distinguishing the source of goods or services in the field”); *In re Bed & Breakfast Registry*, 791 F.2d 157, 160 (Fed. Cir. 1986) (“[t]he record shows that a large number of marks embodying the words ‘bed and breakfast’ are used for similar reservation services, a factor that weighs in favor of the conclusion that BED & BREAKFAST REGISTRY and BED & BREAKFAST INTERNATIONAL are not rendered confusingly similar merely because they share the words ‘bed and breakfast’”).

The Examiner fails to address Applicant’s arguments for third party registrations with respect to *du Pont*, thus the Examiner concedes that the practice of the Trademark Office in registering these marks underscores the fact that terms of Applicant’s Mark and NU VERUS &

Design are dissimilar. Since all of these marks coexist (some of the demonstrated marks have coexisted over 20 years), it is possible for Applicant's Mark and NU VERUS & Design to also peacefully coexist.

E) Cases Which May be Cited.

The Examiner repeatedly refers to and relies on Applicant's previous appeal and previous application file history for United States Application No. 85/558,774 in which the Trademark Trial and Appeal Board affirmed the Examining Attorney's 2(d) refusal for the mark "NUTRIVERUS" in standard character.¹¹ The decision **was not** designated as PRECEDENTIAL. Whereas the Examiner may cite Applicant's prior appeal, the decision of the board is not binding. See TMEP 705.05.

Moreover, the previous appeal and the previous application file history contained several crucial distinctions that are not present here. For example, Applicant's previous application sought registration of "NUTRIVERUS" in standard character; the identification of goods was not limited by channels of trade or marketing; and the use of the NUTRIVERUS mark had not been proven prior to the appeal, thus co-existence could not be considered by the Trademark Trial and Appeal Board. Unlike the previous appeal and application, Applicant's application currently seeks registration of NUTRIVERUS & Design; Applicant's application specifically limits its channels of trade to "dietary and nutritional supplements sold through a multi-level marketing programs"; and the Marks have coexisted for over four years with no consumer confusion. Accordingly, this case must be decided on its own facts as each mark stands on its own merits based on the evidence of record.

¹¹ Examiner's Appeal Brief page 3 and 4.

III. CONCLUSION

Based on the foregoing submission, Applicant's Appeal Brief, and Applicant's prior submissions responsive to the office actions, Applicant submits that any conclusion that there is a likelihood of confusion would be speculative and contrary to the record in this application as the cited marks themselves in their entireties; the goods associated with the marks; channel of trade; sophistication of purchasers and nature and number of similar marks all demonstrate that no likelihood of confusion exists. On this record, when the relevant likelihood of confusion factors are properly considered and weighed, there is no reasonable likelihood of confusion. Accordingly, Applicant respectfully requests the Section 2(d) refusals be reversed and the present application passed to publication.

Respectfully submitted,

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Date: May 11, 2016

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EXHIBIT A



² prefix

noun | pre·fix | \ˈprē·fiks\

Simple Definition of PREFIX

: a letter or group of letters that is added at the beginning of a word to change its meaning

: a title (such as "Mr." or "Dr.") that is used before a person's name

Source: Merriam-Webster's Learner's Dictionary

Full Definition of PREFIX

1 : an affix attached to the beginning of a word, base, or phrase and serving to produce a derivative word or an inflectional form — compare *SUFFIX*

2 : a title used before a person's name

—*prefixal*  \ˈprē·fik-səl, prē-ˈ\ *adjective*

See *prefix* defined for English-language learners

EXHIBIT B

SanDisk **80%** Flash-based systems use 80% less power requiring less cooling. **TELL M**



nu 

noun | \ 'nū, 'nyū\

Definition of NU

Popularity: Bottom 40% of words

: the 13th letter of the Greek alphabet — see ALPHABET TABLE

Origin of NU

Greek *ny*, of Semitic origin; akin to Hebrew *nūn* *nun*

First Known Use: 16



Other Alphabet Terms

cuneiform, linear, minuscule, pictograph, rune, symbology, wedge

Rhymes with NU

blue, boo, brew, chew, clew, clue, coo, coup, crew, cue, dew, do, doux, due, ewe, few, flu, flue, fou, glue, gnu, goo, hew, hue, low, Koo, llau, loo, moo, move, mit

