PTO Form 1930 (Rev 9/2007)

OMB No. 0651-0050 (Exp. 4/30/2009)

Request for Reconsideration after Final Action

The table below presents the data as entered.

Input Field	Entered
SERIAL NUMBER	85121542
LAW OFFICE ASSIGNED	LAW OFFICE 102
MARK SECTION (no change)	
ARGUMENT(S)	

The Applicant, CBC (America) Corp. (the "Applicant"), acknowledges receipt of the final Office Action, dated January 13, 2012 (the "Final Office Action"), of Examining Attorney Anthony M. Rinker, Esq. (the "EA") in connection with the above-referenced application for registration (the "Application") of the SALTO (and Design) mark ("Applicant's Mark"). Please enter following Amendment to the Application and consider the following Request for Reconsideration.

I. AMENDMENT

A. Identification of Goods

Please delete the current identification of goods in international class 27 and insert the following:

PVC-free, vinyl, rubber and plastic flooring; non-metal flooring, namely, stone, wood, rubber and PVC-free tiles; PVC-free, vinyl, rubber and non-metal flooring sheet goods, in international class 19.

II. ARGUMENT IN SUPPORT OF AMENDMENT

A. History

In its original Application filing on September 2, 2010, the Applicant identified the goods in the Application as "*floor coverings*" in international class 27. The Applicant's use of the term "floor coverings" complied with the PTO's Trademark Manual of Examining Procedure ("TMEP") §1402.01, in that it used "a common name, using terminology that is generally understood" in the relevant trade and by consumers.

In the first Office Action, issued November 22, 2010 (the "First Office Action"), the EA stated that the wording "floor coverings" was too broad and could include goods classified in other international classes. As a solution, the EA proposed amending the description of goods in the Application to "*floor coverings, namely, stone tiles*" in international class 19.

As a response to the First Office Action, the Applicant emailed the EA on April 29, 2011 and requested that the identification of goods in the Application be amended to "*PVC-free, vinyl, rubber and plastic non-metal flooring; non-metal floor coverings, namely, stone, wood, rubber and PVC-free tiles; sheet goods, namely, PVC-free, vinyl, rubber and non-metal flooring*" in international class 19.

After considering the Applicant's proposed description, the EA issued a second Office Action on May 16, 2011 (the "Second Office Action"), in which the EA stated that the Second Office Action superseded the First Office Action. The EA also withdrew his previous requirements regarding the identification/classification of goods in the Application due to his determination that the originally submitted language in international class 27 ("*floor coverings*") was definite and correctly classified. The EA did not expressly address the Applicant's proposed amendment to the identification of goods. As a new issue, however, the EA rejected the stone tile specimen originally submitted with the Application based on his determination that it did not show the SALTO (and Design) mark used in

connection with the goods specified in the application, namely, floor coverings. The EA stated that the specimen is for a stone tile, which is an international class 19 flooring, and that "floor coverings are not flooring." He then specified that "[f]looring is used to provide a walking surface on a sub-floor, while floor coverings are used to cover or protect existing flooring."

On May 20, 2011, the Applicant submitted its Response to the Second Office Action, in which it formally requested that the description of goods in the Application be amended to "*PVC-free, vinyl, rubber and plastic flooring; non-metal flooring, namely, stone, wood, rubber and PVC-free tiles; PVC-free, vinyl, rubber and non-metal flooring sheet goods*" (the "Applicant's Proposed Identification"). The EA rejected the Applicant's Proposed Identification in his Third Office Action, issued on June 13, 2011. The EA's reasoning was that the original identification of "*floor coverings*" in class 27 was definite and correctly classified, and he believed the Proposed Identification refers to goods that are not within the scope of the original identification. Again, the EA stated: "Floor coverings are not flooring. Flooring is used to provide a walking surface on a sub-floor, while floor coverings are used to cover or protect existing flooring." The EA also rejected the Applicant's stone tile specimen again, as he believes it represents a class 19 flooring, not a class 27 floor covering.

On December 13, 2011, the Applicant submitted its Response to the Third Office Action, in which it again attempted to amend the description of goods in the Application to the Applicant's Proposed Identification, and supported its position with additional arguments. The EA once again rejected the Applicant's proposed revision in his Final Office Action based on his belief that Proposed Identification refers to goods that are not within the scope of the original identification, and also renewed his rejection of the stone tile specimen.

B. Argument

In response to the EA's repeated rejection of the Applicant's requested amendment, the Applicant maintains its position that the language contained in its original Application - "*floor coverings*" - is commonly understood in the market and in the professional community of home design and repair professionals as encompassing flooring in the nature of the tiles and sheet goods provided under the Applicant's Mark. As such, the Applicant's Proposed Identification should be considered to fall within the scope of goods as originally filed, and the Application should be amended as requested.

In support of its position, the Applicant requests that the EA reconsider and give proper weight to the fact that the leading authorities in the field of floorings and floor coverings use these two terms interchangeably, as follows:

- ***Floor Covering*** *Weekly* - www.floorcoveringweekly.com - Although this entity bills itself as "[the **Floor Covering**] Industry's Business News & Information Resource," it features a variety of "flooring" materials (as the EA has integrated that term) on its Product Source Guide webpage, including but not limited to tiles, adhesives, bamboo and hardwood flooring, mats and matting, and vinyl and linoleum sheeting.
- *World* ***Floor Covering*** *Association* - www.wfca.org - This entity claims to be "the only unbiased source of information on all types of flooring, including carpet, hardwood flooring, laminate flooring, ceramic tile, area rugs, natural stone, cork, bamboo and vinyl flooring." (emphasis added).
- ***Floor Covering*** *News* - www.fcnews.net - This entity provides news and information not only in the field of carpet, but in the fields of hardwood, laminate, ceramic tiles, and other types of "flooring" (as the EA has interpreted that term).
- ***Floor Coverings*** *International* - www.floorcoveringsinternational.com - This entity offers design, retail purchase and installation services for carpet, hardwood flooring, natural stone flooring, ceramic tile, laminate flooring, vinyl, and specialty materials.
- *Surfaces* - www.surfaces.com/attendee/show-information.aspx - This annual trade show advertises itself as the "#1 floor covering event where thousands of industry professionals have the opportunity to see the newest and most innovative products in every category [of floor coverings]: carpet, tile, hardwood, rugs and laminate" (emphasis added).

Screenshots or relevant pages from the aforementioned websites are included herewith as **Exhibit A**. All of the aforementioned entities are leading authorities in the field of floor coverings and include the term "floor covering" or "floor coverings" in their business and trade names. However, none of their business operations are narrowly limited to floor covering products as the EA has interpreted that term . Rather, these entities direct their activities towards those products which the EA has

characterized as "flooring," such as tiles and linoleum sheeting. It follows that these leading authorities in the floor coverings industry use the terms "floor coverings" and "flooring" interchangeably. Such evidence clearly established that the term "floor coverings" is generally understood in the relevant industry, and by consumers, to encompass the goods set forth in Applicants' Proposed Identification. *See* In re Thor Tech, Inc., 85 U.S.P.Q. 2d 1474 (TTAB 2007). The Applicant's position that the terms "floor coverings" and "flooring" are interchangeable is further supported by non-industry specific sources. Specifically, the Wikipedia listing for "flooring" expressly states at the outset that "[b]oth terms are used interchangeably." See the first printed page of a screenshot from Wikipedia website, attached hereto as **Exhibit B**. As explicitly stated in the PTO's own TMEP, as one of the guidelines that the EA "must consider," "The common understanding of words or phrases used in an identification determines the scope and nature of the goods or services. A basic and widely available dictionary should be consulted to determine the definition or understanding of a commonly used word." TMEP §1402.03(4). In this case, it is clear that the commonly used term "floor coverings" clearly encompasses the goods specified in the Applicant's Proposed Identification.

In addition to the aforementioned independent sources, the U.S. Patent and Trademark Office's (the "PTO's") own precedent reveals that it, too, considers the terms "floor coverings" and "flooring" to be essentially equivalent and interchangeable terms. Specifically, the Applicant has identified the following recent registrations that use the terms interchangeably between classes 19 and 27:

- U.S. Reg. No. 3,967,942: "*...vinyl flooring and vinyl floor coverings*" in international class 19;
- U.S. Reg. No. 4,024,778: "*...ceramic tiles for tile floors and coverings...*" in international class 19;
- U.S. Reg. No. 4,005,272: "*floor coverings, namely, parquet flooring, laminate flooring, hardwood flooring, cork flooring, vinyl flooring, and non- metal tiles for flooring*" in international class 19;
- U.S. Reg. No. 3,161,710: "*floor coverings, namely-- sports flooring, laminate, vinyl wall base, rubber wall base, ceramic floor tiles, wood floor tiles, vinyl floor tiles*" in international class 19; and
- U.S. Reg. No. 3,138,178: "*earthenware tiles and all types of natural stone tile floor covering*" in international class 19.

Copies of the certificates of registration issued for the aforementioned registrations are attached as **Exhibit C**. Of particular note is U.S. Reg. No. 4,005,272, the application for which originally identified "*floor coverings*" in international classes 19 and 27. The registrant was subsequently permitted to amend this description to "*floor coverings, namely, parquet flooring, laminate flooring, hardwood flooring, cork flooring, vinyl flooring, and non- metal tiles for flooring*" in international class 19. In addition, the PTO's own "Acceptable Identification of Goods and Services Manual" (the "ID Manual") includes, as acceptable identifications, "ceramic tiles for tile floors and covering," "cork tiles.... for floor.... coverings," and others, that make it clear that the PTO regards "floor coverings" as encompassing the types of goods set forth in Applicant's Proposed Identification.

The Applicant respectfully submits that the identifications of goods set forth in the above-listed registrations, as well as in the PTO's ID Manual, clearly evidence the PTO's repeated acknowledgement that the terms "floor coverings" and "floorings" are, in essence, interchangeable. Indeed, the EA himself proposed in the First Office Action a description of goods that referenced "*floor coverings*" in international class 19.

The EA discounted the aforementioned registrations in the final Office Action, stating that "floor coverings" in class 27 are "one-piece goods that include, rugs, carpet, rolls of laminate flooring, etc. that is cut to fit or used as a whole." The Applicant respectfully submits that is not the case: in particular, various types of "tiles," parquet flooring," "hardwood flooring" and others are definitely not "one piece goods... that is cut to fit or used as a whole." Moreover, the EA has provided no authority in support of his proposed definition of this term, and has provided no evidence that the PTO adheres to this official standard in determining what goods fall within this broad category. If the PTO has issued an official statement in support of the EA's assertion, the Applicant respectfully requests that the EA provide the proper reference. Otherwise, the Applicant submits that, absent an official stance squarely taken by the PTO on this matter, proper and conclusive weight should be given to the PTO's ID Manual and established precedent, and to relevant authorities within the floor coverings industry.

The Applicant again submits that the foregoing information reveals that the leading authorities in the field of floor coverings consider goods such as those identified in the Applicant's Proposed

Identification to fall into the definition of both floor coverings and flooring, and that they use these terms interchangeably. Moreover, the PTO itself has revealed through its examination and approval of recent registrations that it considers the terms "floor coverings" and "flooring" to be equivalent and interchangeable. It follows that the Applicant's Proposed Identification is not outside the scope of the identification originally set forth in the Application.

In consideration of the foregoing independent authorities, and in the interests of consistency and in consideration of the precedent set by the PTO, the Applicant respectfully renews its request that the EA withdraw his rejection of the recitation of Applicant's Proposed Identification, and allow the Application to proceed with the goods set forth above, namely, "*PVC-free, vinyl, rubber and plastic flooring; non-metal flooring, namely, stone, wood, rubber and PVC-free tiles; PVC-free, vinyl, rubber and non-metal flooring sheet goods.*"

III. CONCLUSION

By this Response, the Applicant believes it has satisfactorily addressed the issues raised by the EA in the Office Action. Therefore, Applicant respectfully requests that the EA approve the Application for publication with the Applicant's Proposed Identification.

The Applicant respectfully requests that the EA telephone David O. Johanson, Esq. at (617) 951-8304 if the EA has any further questions regarding the Application.

EVIDENCE SECTION	
EVIDENCE FILE NAME(S)	
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CONVERTED PDF FILE(S) (7 pages)	\\TICRS\EXPORT16\IMAGEOUT16\851\215\85121542\xml1\RFR0011.JPG
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DESCRIPTION OF EVIDENCE FILE	Exhbits A, B and C.
GOODS AND/OR SERVICES SECTION (current)	
INTERNATIONAL CLASS	019
DESCRIPTION	
PVC-free, vinyl, rubber and plastic flooring; non-metal flooring, namely, stone, wood, rubber and PVC-free tiles; PVC-free, vinyl, rubber and non-metal flooring sheet goods	
FILING BASIS	Section 1(a)
FIRST USE ANYWHERE DATE	At least as early as 01/19/2010
FIRST USE IN COMMERCE DATE	At least as early as 01/19/2010
GOODS AND/OR SERVICES SECTION (proposed)	
INTERNATIONAL CLASS	019
TRACKED TEXT DESCRIPTION	

PVC-free, vinyl, rubber and plastic flooring; non-metal flooring, namely, stone, wood, rubber and PVC-free tiles; ~~PVC-free, vinyl, rubber and non-metal flooring sheet goods~~; PVC-free, vinyl, rubber and non-metal flooring sheet goods.
FINAL DESCRIPTION
PVC-free, vinyl, rubber and plastic flooring; non-metal flooring, namely, stone, wood, rubber and PVC-free tiles; PVC-free, vinyl, rubber and non-metal flooring sheet goods.

FILING BASIS	Section 1(a)
FIRST USE ANYWHERE DATE	At least as early as 01/19/2010
FIRST USE IN COMMERCE DATE	At least as early as 01/19/2010
SIGNATURE SECTION	
RESPONSE SIGNATURE	/davidjohanson/
SIGNATORY'S NAME	David Johanson
SIGNATORY'S POSITION	Attorney for Applicant, Massachusetts bar member
DATE SIGNED	07/13/2012
AUTHORIZED SIGNATORY	YES
CONCURRENT APPEAL NOTICE FILED	YES
FILING INFORMATION SECTION	
SUBMIT DATE	Fri Jul 13 16:44:34 EDT 2012
TEAS STAMP	USPTO/RFR-205.196.204.4-20120713164434734925-85121542-490dbed31fa3af6f72b3293b196b186bf-N/A-N/A-20120713164353699137

PTO Form 1930 (Rev 9/2007)

OMB No. 0651-0050 (Exp. 4/30/2009)

Request for Reconsideration after Final Action

To the Commissioner for Trademarks:

Application serial no. **85121542** has been amended as follows:

ARGUMENT(S)

In response to the substantive refusal(s), please note the following:

The Applicant, CBC (America) Corp. (the "Applicant"), acknowledges receipt of the final Office Action, dated January 13, 2012 (the "Final Office Action"), of Examining Attorney Anthony M. Rinker, Esq. (the "EA") in connection with the above-referenced application for registration (the "Application") of the SALTO (and Design) mark ("Applicant's Mark"). Please enter following Amendment to the Application and consider the following Request for Reconsideration.

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II. ARGUMENT IN SUPPORT OF AMENDMENT

A. History

In its original Application filing on September 2, 2010, the Applicant identified the goods in the Application as "*floor coverings*" in international class 27. The Applicant's use of the term "floor coverings" complied with the PTO's Trademark Manual of Examining Procedure ("TMEP") §1402.01, in that it used "a common name, using terminology that is generally understood" in the relevant trade and by consumers.

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specimen is for a stone tile, which is an international class 19 flooring, and that "floor coverings are not flooring." He then specified that "[f]looring is used to provide a walking surface on a sub-floor, while floor coverings are used to cover or protect existing flooring."

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B. Argument

In response to the EA's repeated rejection of the Applicant's requested amendment, the Applicant maintains its position that the language contained in its original Application - "*floor coverings*" - is commonly understood in the market and in the professional community of home design and repair professionals as encompassing flooring in the nature of the tiles and sheet goods provided under the Applicant's Mark. As such, the Applicant's Proposed Identification should be considered to fall within the scope of goods as originally filed, and the Application should be amended as requested.

In support of its position, the Applicant requests that the EA reconsider and give proper weight to the

fact that the leading authorities in the field of floorings and floor coverings use these two terms interchangeably, as follows:

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Screenshots or relevant pages from the aforementioned websites are included herewith as **Exhibit A**. All of the aforementioned entities are leading authorities in the field of floor coverings and include the term "floor covering" or "floor coverings" in their business and trade names. However, none of their business operations are narrowly limited to floor covering products as the EA has interpreted that term . Rather, these entities direct their activities towards those products which the EA has characterized as "flooring," such as tiles and linoleum sheeting. It follows that these leading authorities in the floor

coverings industry use the terms "floor coverings" and "flooring" interchangeably. Such evidence clearly established that the term "floor coverings" is generally understood in the relevant industry, and by consumers, to encompass the goods set forth in Applicants' Proposed Identification. *See* In re Thor Tech, Inc., 85 U.S.P.Q. 2d 1474 (TTAB 2007).

The Applicant's position that the terms "floor coverings" and "flooring" are interchangeable is further supported by non-industry specific sources. Specifically, the Wikipedia listing for "flooring" expressly states at the outset that "[b]oth terms are used interchangeably." See the first printed page of a screenshot from Wikipedia website, attached hereto as **Exhibit B**. As explicitly stated in the PTO's own TMEP, as one of the guidelines that the EA "must consider," "The common understanding of words or phrases used in an identification determines the scope and nature of the goods or services. A basic and widely available dictionary should be consulted to determine the definition or understanding of a commonly used word." TMEP §1402.03(4). In this case, it is clear that the commonly used term "floor coverings" clearly encompasses the goods specified in the Applicant's Proposed Identification.

In addition to the aforementioned independent sources, the U.S. Patent and Trademark Office's (the "PTO's") own precedent reveals that it, too, considers the terms "floor coverings" and "flooring" to be essentially equivalent and interchangeable terms. Specifically, the Applicant has identified the following recent registrations that use the terms interchangeably between classes 19 and 27:

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- U.S. Reg. No. 4,024,778: "*...ceramic tiles for tile floors and coverings...*" in international class 19;
- U.S. Reg. No. 4,005,272: "*floor coverings, namely, parquet flooring, laminate flooring, hardwood flooring, cork flooring, vinyl flooring, and non- metal tiles for flooring*" in international class 19;
- U.S. Reg. No. 3,161,710: "*floor coverings, namely-- sports flooring, laminate, vinyl wall base, rubber wall base, ceramic floor tiles, wood floor tiles, vinyl floor tiles*" in international class 19; and
- U.S. Reg. No. 3,138,178: "*earthenware tiles and all types of natural stone tile floor covering*" in international class 19.

Copies of the certificates of registration issued for the aforementioned registrations are attached as **Exhibit C**. Of particular note is U.S. Reg. No. 4,005,272, the application for which originally identified

"*floor coverings*" in international classes 19 and 27. The registrant was subsequently permitted to amend this description to "*floor coverings, namely, parquet flooring, laminate flooring, hardwood flooring, cork flooring, vinyl flooring, and non- metal tiles for flooring*" in international class 19. In addition, the PTO's own "Acceptable Identification of Goods and Services Manual" (the "ID Manual") includes, as acceptable identifications, "ceramic tiles for tile floors and covering," "cork tiles.... for floor.... coverings," and others, that make it clear that the PTO regards "floor coverings" as encompassing the types of goods set forth in Applicant's Proposed Identification.

The Applicant respectfully submits that the identifications of goods set forth in the above-listed registrations, as well as in the PTO's ID Manual, clearly evidence the PTO's repeated acknowledgement that the terms "floor coverings" and "floorings" are, in essence, interchangeable. Indeed, the EA himself proposed in the First Office Action a description of goods that referenced "*floor coverings*" in international class 19.

The EA discounted the aforementioned registrations in the final Office Action, stating that "floor coverings" in class 27 are "one-piece goods that include, rugs, carpet, rolls of laminate flooring, etc. that is cut to fit or used as a whole." The Applicant respectfully submits that is not the case: in particular, various types of "tiles," parquet flooring," "hardwood flooring" and others are definitely not "one piece goods... that is cut to fit or used as a whole." Moreover, the EA has provided no authority in support of his proposed definition of this term, and has provided no evidence that the PTO adheres to this official standard in determining what goods fall within this broad category. If the PTO has issued an official statement in support of the EA's assertion, the Applicant respectfully requests that the EA provide the proper reference. Otherwise, the Applicant submits that, absent an official stance squarely taken by the PTO on this matter, proper and conclusive weight should be given to the PTO's ID Manual and established precedent, and to relevant authorities within the floor coverings industry.

The Applicant again submits that the foregoing information reveals that the leading authorities in the field of floor coverings consider goods such as those identified in the Applicant's Proposed Identification to fall into the definition of both floor coverings and flooring, and that they use these terms interchangeably. Moreover, the PTO itself has revealed through its examination and approval of recent registrations that it considers the terms "floor coverings" and "flooring" to be equivalent and

interchangeable. It follows that the Applicant's Proposed Identification is not outside the scope of the identification originally set forth in the Application.

In consideration of the foregoing independent authorities, and in the interests of consistency and in consideration of the precedent set by the PTO, the Applicant respectfully renews its request that the EA withdraw his rejection of the recitation of Applicant's Proposed Identification, and allow the Application to proceed with the goods set forth above, namely, "*PVC-free, vinyl, rubber and plastic flooring; non-metal flooring, namely, stone, wood, rubber and PVC-free tiles; PVC-free, vinyl, rubber and non-metal flooring sheet goods.*"

III. CONCLUSION

By this Response, the Applicant believes it has satisfactorily addressed the issues raised by the EA in the Office Action. Therefore, Applicant respectfully requests that the EA approve the Application for publication with the Applicant's Proposed Identification.

The Applicant respectfully requests that the EA telephone David O. Johanson, Esq. at (617) 951-8304 if the EA has any further questions regarding the Application.

EVIDENCE
Evidence in the nature of Exhbits A, B and C. has been attached.
Original PDF file:
evi_2051962044-113803785_._Exhibits.pdf
Converted PDF file(s) (9 pages)
Evidence-1
Evidence-2
Evidence-3
Evidence-4
Evidence-5
Evidence-6
Evidence-7
Evidence-8
Evidence-9
Original PDF file:
evi_2051962044-113803785_._Exhibits-A.pdf
Converted PDF file(s) (7 pages)
Evidence-1
Evidence-2
Evidence-3
Evidence-4
Evidence-5
Evidence-6
Evidence-7

CLASSIFICATION AND LISTING OF GOODS/SERVICES
Applicant proposes to amend the following class of goods/services in the application:
Current: Class 019 for PVC-free, vinyl, rubber and plastic flooring; non-metal flooring, namely, stone, wood, rubber and PVC-free tiles; PVC-free, vinyl, rubber and non-metal flooring sheet goods
Original Filing Basis:
Filing Basis: Section 1(a), Use in Commerce: The applicant is using the mark in commerce, or the applicant's related company or licensee is using the mark in commerce, on or in connection with the identified goods and/or services. 15 U.S.C. Section 1051(a), as amended. The mark was first used at least as early as 01/19/2010 and first used in commerce at least as early as 01/19/2010, and is now in use in such commerce.

Proposed:
Tracked Text Description: PVC-free, vinyl, rubber and plastic flooring; non-metal flooring, namely, stone, wood, rubber and PVC-free tiles; ~~PVC-free, vinyl, rubber and non-metal flooring sheet goods~~; PVC-free, vinyl, rubber and non-metal flooring sheet goods.

Class 019 for PVC-free, vinyl, rubber and plastic flooring; non-metal flooring, namely, stone, wood, rubber and PVC-free tiles; PVC-free, vinyl, rubber and non-metal flooring sheet goods.
Filing Basis: Section 1(a), Use in Commerce: The applicant is using the mark in commerce, or the applicant's related company or licensee is using the mark in commerce, on or in connection with the identified goods and/or services. 15 U.S.C. Section 1051(a), as amended. The mark was first used at least as early as 01/19/2010 and first used in commerce at least as early as 01/19/2010, and is now in use in such commerce.
SIGNATURE(S)
Request for Reconsideration Signature
Signature: /davidjohanson/ Date: 07/13/2012
Signatory's Name: David Johanson
Signatory's Position: Attorney for Applicant, Massachusetts bar member

The signatory has confirmed that he/she is an attorney who is a member in good standing of the bar of the highest court of a U.S. state, which includes the District of Columbia, Puerto Rico, and other federal territories and possessions; and he/she is currently the applicant's attorney or an associate thereof; and to the best of his/her knowledge, if prior to his/her appointment another U.S. attorney or a Canadian attorney/agent not currently associated with his/her company/firm previously represented the applicant in this matter: (1) the applicant has filed or is concurrently filing a signed revocation of or substitute power of attorney with the USPTO; (2) the USPTO has granted the request of the prior representative to withdraw; (3) the applicant has filed a power of attorney appointing him/her in this matter; or (4) the applicant's appointed U.S. attorney or Canadian attorney/agent has filed a power of attorney appointing him/her as an associate attorney in this matter.

The applicant is filing a Notice of Appeal in conjunction with this Request for Reconsideration.

Serial Number: 85121542
Internet Transmission Date: Fri Jul 13 16:44:34 EDT 2012
TEAS Stamp: USPTO/RFR-205.196.204.4-20120713164434 73
4925-85121542-490dbed31fa3af6f72b3293b19
6b186bf-N/A-N/A-20120713164353699137

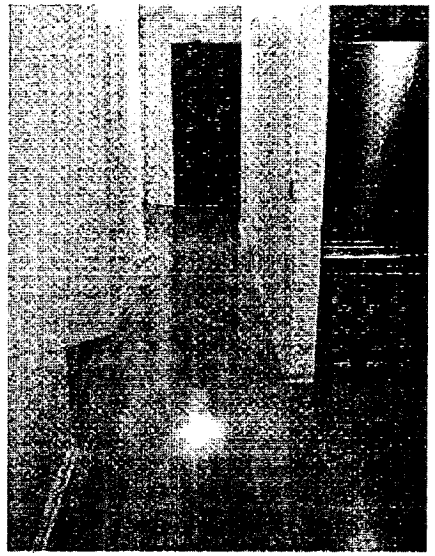
EXHIBIT B

Flooring

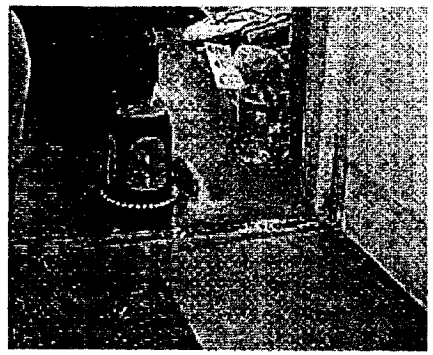
From Wikipedia, the free encyclopedia
(Redirected from Floor covering)

Flooring is the general term for a permanent covering of a floor, or for the work of installing such a floor covering. **Floor covering** is a term to generically describe any finish material applied over a floor structure to provide a walking surface. Both terms are used interchangeably but floor covering refers more to loose-laid materials.

Materials almost always classified as floor covering include carpet, area rugs, and resilient flooring such as linoleum or vinyl flooring. Materials commonly called flooring include wood flooring, ceramic tile, stone, terrazzo, and various seamless chemical floor coatings.[1]



An example of a flooring job.



Levelling of ceramic tiles floor with a laser device

Contents

Subfloor

Main article: Subfloor

The floor under the flooring is called the subfloor. This provides the support for the flooring. Special purpose subfloors like floating floors, raised floors or sprung floors may be laid upon another

EXHIBIT C

United States of America
United States Patent and Trademark Office

Reg. No. 3,967,942

Registered May 24, 2011

Int. Cl.: 19

TRADEMARK

PRINCIPAL REGISTER

PERGO (EUROPE) AB (SWEDEN CORPORATION)
STRANDRIDAREGATAN 8
TRELLEBORG, SWEDEN SE-23125

FOR: HARD SURFACE FLOOR MOLDING, NAMELY, END PIECES, WALL BASE MOLDINGS, QUARTER ROUND MOLDINGS, TRANSITION MOLDINGS, STAIR NOSES, T-MOLDINGS AND END MOLDINGS, ALL MADE OF HIGH DENSITY FIBERBOARD; FLOOR MATERIAL, NAMELY, WOOD FLOORING AND PARQUET WOOD FLOORING; VINYL FLOORING AND VINYL FLOOR COVERINGS, IN CLASS 19 (U.S. CLS. 1, 12, 33 AND 50).

FIRST USE 5-31-2007; IN COMMERCE 5-31-2007.

OWNER OF U.S. REG. NOS. 1,693,204, 3,147,660, AND OTHERS.

THE MARK CONSISTS OF THE WORDS "THERE'S ONLY ONE PERGO" UNDERNEATH A BLACK AND WHITE DOG.

SN 85-095,259, FILED 7-28-2010.

ALLISON SCHRODY, EXAMINING ATTORNEY

David J. Kappos

Director of the United States Patent and Trademark Office

United States of America
United States Patent and Trademark Office

COMMERCIAL CARPETS OF AMERICA

Reg. No. 4,024,778

Registered Sep. 13, 2011

Int. Cls.: 19, 27, 35, 37 and 42

TRADEMARK

SERVICE MARK

PRINCIPAL REGISTER

COMMERCIAL CARPETS OF AMERICA, INC. (VIRGINIA CORPORATION)
430 S. PICKETT STREET
ALEXANDRIA, VA 22304

FOR: CERAMIC TILES, CERAMIC TILES FOR FLOORING AND FACING, CERAMIC TILES FOR FLOORING AND LINING, CERAMIC TILES FOR TILE FLOORS AND COVERINGS, VINYL FLOORING, VINYL TILES, IN CLASS 19 (U.S. CLS. 1, 12, 33 AND 50).

FIRST USE 7-1-1980; IN COMMERCE 7-1-1980.

FOR: CARPET TILES, CARPET TILES FOR COVERING FLOORS, CARPETING, CARPETS, RUGS, MATS AND MATTING, FLOOR COVERINGS, FLOOR COVERINGS OF RUBBER AND SYNTHETIC RUBBER, RESILIENT HARD SURFACE COVERINGS FOR FLOORS, VINYL FLOOR COVERINGS, IN CLASS 27 (U.S. CLS. 19, 20, 37, 42 AND 50).

FIRST USE 7-1-1980; IN COMMERCE 7-1-1980.

FOR: RETAIL STORE SERVICES FEATURING CARPETS, LINOLEUM, VINYL AND CERAMIC TILES, AND HARDWOOD FLOORING; CUSTOMER SERVICE IN THE FIELD OF FLOORING, IN CLASS 35 (U.S. CLS. 100, 101 AND 102).

FIRST USE 7-1-1980; IN COMMERCE 7-1-1980.

FOR: INSTALLATION, CLEANING, MAINTENANCE, AND REPAIR OF CARPET, LINOLEUM, VINYL AND CERAMIC TILES, AND HARDWOOD FLOORING FOR COMMERCIAL AND RESIDENTIAL USE, IN CLASS 37 (U.S. CLS. 100, 103 AND 106).

FIRST USE 7-1-1980; IN COMMERCE 7-1-1980.

FOR: DESIGN AND DESIGN CONSULTING SERVICES, AND PRODUCT DEVELOPMENT, ALL IN THE FIELD OF FLOORING, IN CLASS 42 (U.S. CLS. 100 AND 101).

FIRST USE 7-1-1980; IN COMMERCE 7-1-1980.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

David J. Kappos

Director of the United States Patent and Trademark Office

Reg. No. 4,024,778 NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "CARPETS", APART FROM THE MARK AS SHOWN.

SEC. 2(F).

SER. NO. 85-026,999, FILED 4-30-2010.

LINDA MICKLEBURGH, EXAMINING ATTORNEY

United States of America
United States Patent and Trademark Office

SELITAC

Reg. No. 4,005,272

Registered Aug. 2, 2011

Int. Cls.: 17 and 19

TRADEMARK

PRINCIPAL REGISTER

SELIT DÄMMTECHNIK GMBH (FED REP GERMANY CORPORATION)
SELITSTRABE 2
ERBES-BÜDESHEIM, FED REP GERMANY D-55234

FOR: SOUND-DAMPING AND HEAT-INSULATING MATERIALS, IN PARTICULAR IMPACT SOUNDPROOFING AND INSULATING UNDERLAY FOR PARQUET FLOORS AND LAMINATED FLOORS; THE AFORESAID GOODS INCLUDED, IN CLASS 17 (U.S. CLS. 1, 5, 12, 13, 35 AND 50).

FIRST USE 4-30-2010; IN COMMERCE 4-30-2010.

FOR: FLOOR COVERINGS, NAMELY, PARQUET FLOORING, LAMINATE FLOORING, HARDWOOD FLOORING, CORK FLOORING, VINYL FLOORING, AND NON- METAL TILES FOR FLOORING, IN CLASS 19 (U.S. CLS. 1, 12, 33 AND 50).

FIRST USE 4-30-2010; IN COMMERCE 4-30-2010.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

THE WORD(S) "SELITAC" HAS NO MEANING IN A FOREIGN LANGUAGE.

SER. NO. 85-154,662, FILED 10-18-2010.

PATRICIA EVANKO, EXAMINING ATTORNEY

David J. Kappos

Director of the United States Patent and Trademark Office

Int. Cls.: 1, 2, 3, 19 and 27

Prior U.S. Cls.: 1, 4, 5, 6, 10, 11, 12, 16, 19, 20, 26, 33, 37, 42, 46, 50, 51 and 52

Reg. No. 3,161,710

United States Patent and Trademark Office

Registered Oct. 24, 2006

TRADEMARK
PRINCIPAL REGISTER

TARKETT

TARKETT INC. (CANADA CORPORATION)
1001 YAMASKA EAST
FARNHAM, QUEBEC, CANADA J2N 1J7

FOR: PRODUCTS FOR THE LAYING AND MAINTENANCE OF FLOOR COVERINGS, NAMELY- ADHESIVES, IN CLASS 1 (U.S. CLS. 1, 5, 6, 10, 26 AND 46).

FIRST USE 10-31-2004; IN COMMERCE 10-31-2004.

FOR: PRODUCTS FOR THE LAYING AND MAINTENANCE OF FLOOR COVERINGS, NAMELY- FLOOR PROTECTION VARNISHES, COATING PRODUCTS, SEALERS, IN CLASS 2 (U.S. CLS. 6, 11 AND 16).

FIRST USE 10-31-2004; IN COMMERCE 10-31-2004.

FOR: PRODUCTS FOR THE LAYING AND MAINTENANCE OF FLOOR COVERINGS, NAMELY- RESTORERS, FLOOR CLEANING AND STRIPPING PREPARATIONS, FLOOR WAX, FLOOR POLISHES, IN CLASS 3 (U.S. CLS. 1, 4, 6, 50, 51 AND 52).

FIRST USE 10-31-2004; IN COMMERCE 10-31-2004.

FOR: FLOOR COVERINGS, NAMELY- SPORTS FLOORING, LAMINATE, VINYL WALL BASE, RUBBER WALL BASE, CERAMIC FLOOR TILES, WOOD FLOOR TILES, VINYL FLOOR TILES, IN CLASS 19 (U.S. CLS. 1, 12, 33 AND 50).

FIRST USE 10-31-2004; IN COMMERCE 10-31-2004.

FOR: FLOOR COVERINGS, NAMELY- ARTIFICIAL TURF, LINOLEUM, IN CLASS 27 (U.S. CLS. 19, 20, 37, 42 AND 50).

FIRST USE 10-31-2004; IN COMMERCE 10-31-2004.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

OWNER OF U.S. REG. NOS. 580,499, 1,513,707 AND OTHERS.

SER. NO. 78-589,490, FILED 3-17-2005.

SHANNON TWOHIG, EXAMINING ATTORNEY

Int. Cl.: 19

Prior U.S. Cls.: 1, 12, 33 and 50

United States Patent and Trademark Office

Reg. No. 3,138,178

Registered Sep. 5, 2006

TRADEMARK
PRINCIPAL REGISTER

BIG PACIFIC

BIG PACIFIC, LLC (CALIFORNIA LTD LIAB CO)
1316 S. ALLEC ST.
ANAHEIM, CA 92805

FOR: EARTHENWARE TILES AND ALL TYPES OF NATURAL STONE TILE FLOOR COVERING, IN CLASS 19 (U.S. CLS. 1, 12, 33 AND 50).

FIRST USE 1-1-2001; IN COMMERCE 1-1-2001.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

SER. NO. 78-576,919, FILED 2-28-2005.

SAMUEL E. SHARPER JR., EXAMINING ATTORNEY

EXHIBIT A

Nebraska Furniture Mart

Nebraska Furniture Mart to open in Dallas

12/7/2011

Nebraska Furniture Mart (NFM) will break ground on a huge store complex this coming spring in Dallas.

"We've been working on this project since we opened the Kansas City store in 2003," said Bob Batt, executive vice president of NFM, a total home retailer that has been a...

Mohawk partners Operation Finally Home

12/7/2011

[Dalton] Mohawk's sold out aligned retailer convention ended on an incredibly high note Saturday, with a surprise appearance from a special guest at the Solutions 2012 gala. War hero and recently crowned Dancing with the Stars champion J.R. Martinez unveiled an exclusive partnership ...

Daily Update

Lowe's undergoing makeover to win shoppers
12/7/2011

Dal-Tile Corporation announces Pratt as retail channel marketing manager
12/7/2011

Home Depot, Lowe's and Lumber Liquidators have the lowest forward P/E ratio in retial industry
12/7/2011

Super-Click International supports Teams4U in 2012
12/7/2011

Call for entries being accepted for AMC awards and retailer of the year
12/7/2011

Obituary: Greg Cooley, 57
12/6/2011

FCW, No. 21:28, 2011

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GREENSTEP

In this Issue

CRI downsizes
Following an announced restructuring in August that streamlined the Carpet & ...

Retroactive liability risk
The International Trade Commission (ITC) has set into motion the enforcement of ...

Total Solutions keeps tile on the cutting edge
[Phoenix] More than 450 members of the National Tile Council of North America...

FCW Special Report
ITC/DOC appeals to come
Last month, the International Trade Commission (ITC) found in favor of the...

Ramey Rug adds cabinets
[West Palm Beach, Fla.] Ramey Rug officially opened its new 16,000 square foot ...

Oriental Weavers renews, remodels AmericasMart showroom
12/6/2011

EPA revises boiler MACT rules
12/6/2011

NAHB

Twenty metros join list of improving housing markets index in December
12/6/2011

NAHB

Persistent tight lending conditions for home builders threaten economic recovery
12/6/2011

AmericasMart Atlanta

AmericasMart presents first market of 2012 combining rug, home and gift products
12/5/2011

Mohawk launches click LVT
12/5/2011

News Archive

By the Numbers

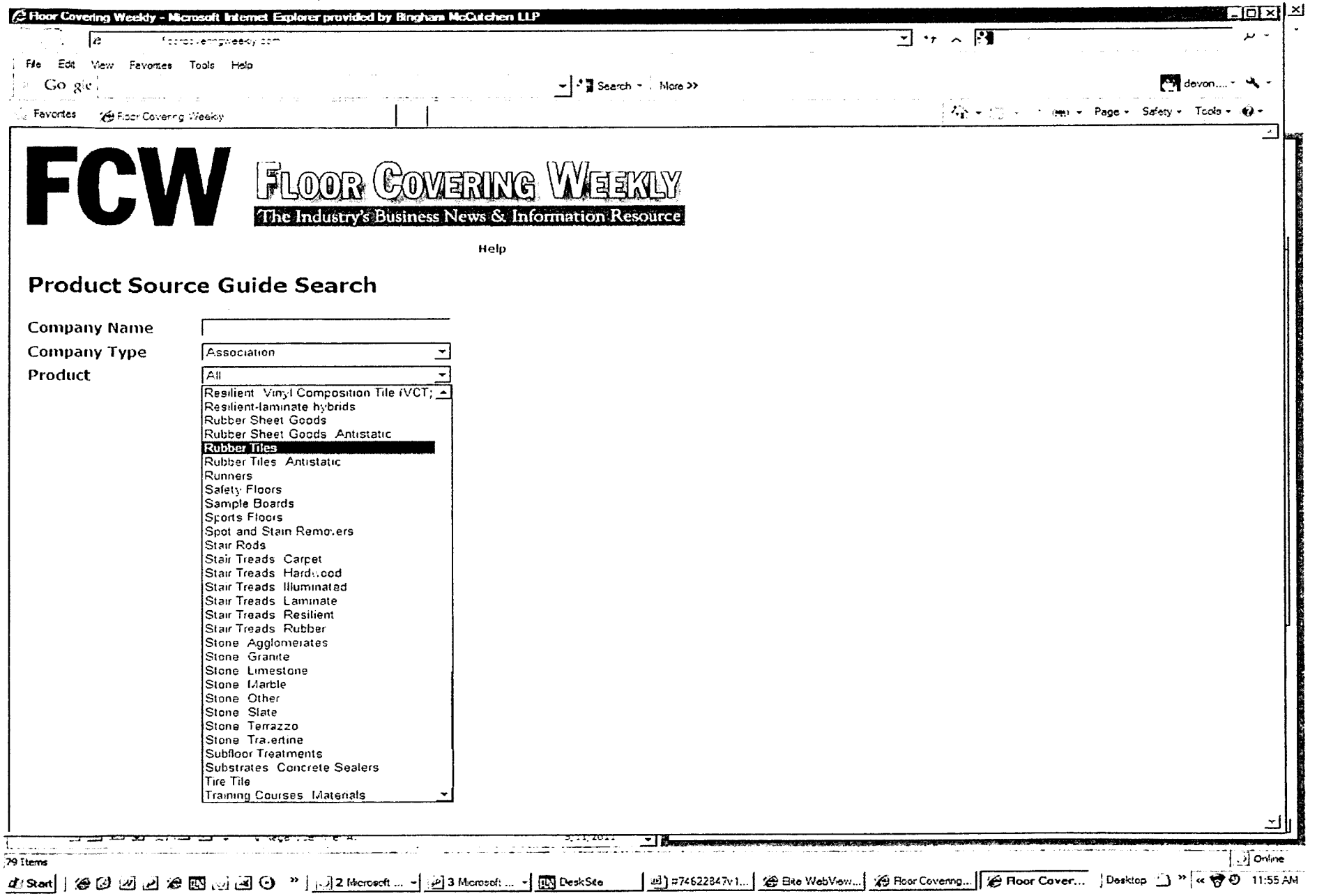
Events Calendar

view full calendar

Shaw's Winter Markets - Sheraton Chicago Hotel & Towers
January 11-12, 2012
Chicago, IL
www.shawshows.com

Shaw's Winter Markets - Embassy Suites/Grapevine
January 11-14, 2012
Dallas, TX
www.shawshows.com

Atlanta International Rug Market
Jan. 12-14, 2012
Atlanta, GA


Floor Covering Weekly - Microsoft Internet Explorer provided by Bingham McCutchen LLP
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Favorites
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Tools
FCW
FLOOR COVERING WEEKLY
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Company Name
Company Type
Association
Product
All
Resilient Vinyl Composition Tile (VCT)
Resilient-laminate hybrids
Rubber Sheet Goods
Rubber Sheet Goods Antistatic
Rubber Tiles
Rubber Tiles Antistatic
Runners
Safety Floors
Sample Boards
Sports Floors
Spot and Stain Removers
Stair Rods
Stair Treads Carpet
Stair Treads Hardwood
Stair Treads Illuminated
Stair Treads Laminate
Stair Treads Resilient
Stair Treads Rubber
Stone Agglomerates
Stone Granite
Stone Limestone
Stone Marble
Stone Other
Stone Slate
Stone Terrazzo
Stone Travertine
Subfloor Treatments
Substrates Concrete Sealers
Tile Tile
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Carpet and Flooring guide and review from WFCA - Microsoft Internet Explorer provided by Bingham McCutchen LLP

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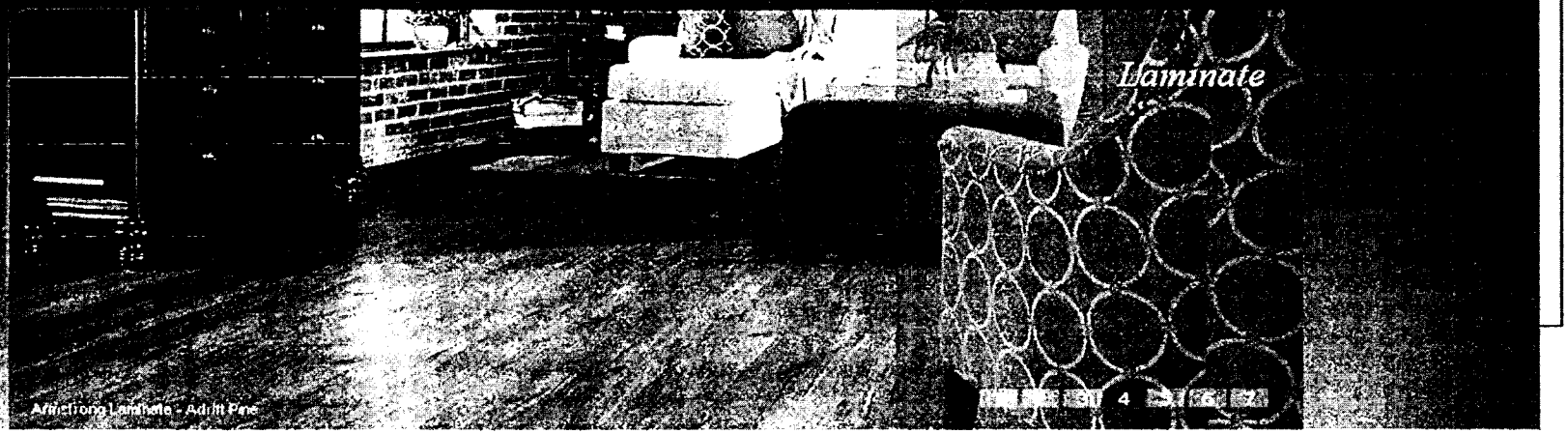
wfca
WORLD FLOOR COVERING ASSOCIATION

Carpet Hardwood Flooring Laminate Flooring Vinyl Flooring Ceramic Tile Flooring Stone Flooring Area Rugs Green Flooring



Flooring Solutions for the Way You Live

The World Floor Covering Association (WFCA) is the only unbiased source of information on all types of flooring, including carpet, hardwood flooring, laminate flooring, ceramic tile, area rugs, natural stone, cork, bamboo and vinyl flooring. The WFCA and its 3,000-members are dedicated to providing consumers the service and support needed to ensure a successful flooring purchase experience.

The WFCA web site gives you all of the tools to help guide you so you can make informative flooring decisions. Learn to manage each variable of your carpet or flooring purchase, including:

- Defining a style, look and feel
- Selecting the appropriate flooring product for a specific room application

Featured Tools

- Every Floor Has Its Place - WFCA's Educational Video Series
- Design articles and advice
- Virtual Room Designer
- Flooring Room Scenes
- Floor Talk - The WFCA blog on flooring and design
- Flooring Comparison Chart
- Top 10 Hardwood Flooring Trends

Page 2 Sec 1 2/2 At 0.5" Ln 1 Col 1

Start | CHUGA-0S1- SALTO - ... | 3 Microsoft Office Acc... | DeskSite | 3 Microsoft Office Word | 7 Internet Explorer | Desktop | 4:29 PM

News

War Hero & Dancing With The Stars champion J.R. Martinez appears at Mohawk retailer convention

DALTON— Mohawk's sold out aligned retailer convention ended on an incredibly high note Saturday, with a surprise appearance from a special guest at the Solutions 2012 gala. War hero and recently crowned *Dancing with the Stars* champion J.R. Martinez unveiled an exclusive partnership between Mohawk and Operation Finally Home, a non-profit organization providing custom-made, mortgage-free homes for America's war wounded. Mohawk will donate flooring for all 16 of the houses Operation Finally Home will build in 2012.

1 tweet

Thursday, December 8th, 2011

Christie named regional VP for Kaleen Rugs

Dalton–Grey Christie has been named regional vice president for the north

0 tweets

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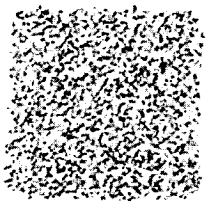
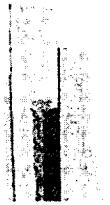
Floor Coverings International offers a wide range of **flooring materials**, styles, and colors from the leading brands. But how do you get started? Deciding what type of flooring is best for your needs doesn't have to be overwhelming or complicated. Our goal is to make it easy for you every step of the way.

Our Design Associates are familiar with all *types of flooring* and will walk you through the selection process so that you're sure to get the perfect flooring for your home. We'll take into account looks, durability, ease of maintenance, budget, and more - so you'll know you're making the best choice for your specific needs. For example, if you're not sure whether carpet or hardwood is the best choice for your particular situation we will review the attributes of various *flooring materials* with you and help you make your selection. Then we can develop a design solution using pattern, color, and even combined materials for a one-of-a-kind floor.

We're pleased to help you explore options for **carpet, hardwood, natural stone flooring, ceramic tile, laminate flooring, vinyl, specialty materials** and our new *eco-friendly* selections.





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