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OMB No. 0651-0050 (Exp 09/20/2020)

Request for Reconsideration after Final Action

The table below presents the data as entered.

Input Field	Entered
SERIAL NUMBER	87766247
LAW OFFICE ASSIGNED	LAW OFFICE 127
MARK SECTION	
MARK	https://tmng-al.uspto.gov/resting2/api/img/87766247/large
LITERAL ELEMENT	FRESH DELIVERED SAFE
STANDARD CHARACTERS	YES
USPTO-GENERATED IMAGE	YES
MARK STATEMENT	The mark consists of standard characters, without claim to any particular font style, size or color.
ARGUMENT(S)	
Please see complete argument attached within the evidence section.	
EVIDENCE SECTION	
EVIDENCE FILE NAME(S)	
ORIGINAL PDF FILE	evi_107515611-20200110194623533363_._Final_FRESH_DELIVERED_SAFE_-_Response_to_Final_office_action.pdf
CONVERTED PDF FILE(S) (12 pages)	\\TICRS\EXPORT17\IMAGEOUT17\877\662\87766247\xml12\RFR0002.JPG
	\\TICRS\EXPORT17\IMAGEOUT17\877\662\87766247\xml12\RFR0003.JPG
	\\TICRS\EXPORT17\IMAGEOUT17\877\662\87766247\xml12\RFR0004.JPG
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DESCRIPTION OF EVIDENCE FILE	Complete response arguments to Final Office Action.
ATTORNEY SECTION (current)	
NAME	Eric L. Johnson
ATTORNEY BAR MEMBERSHIP NUMBER	NOT SPECIFIED

YEAR OF ADMISSION	NOT SPECIFIED
U.S. STATE/ COMMONWEALTH/ TERRITORY	NOT SPECIFIED
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STREET	101 OAKLEY STREET
CITY	EVANSVILLE
STATE	Indiana
POSTAL CODE	47710
COUNTRY	US
PHONE	812-250-3785
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DOCKET/REFERENCE NUMBER	1127-US
ATTORNEY SECTION (proposed)	
NAME	Eric L. Johnson
ATTORNEY BAR MEMBERSHIP NUMBER	XXX
YEAR OF ADMISSION	XXXX
U.S. STATE/ COMMONWEALTH/ TERRITORY	XX
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DOCKET/REFERENCE NUMBER	1127-US
OTHER APPOINTED ATTORNEY	Monica J. Stover and Mark J. Nahnsen, attorneys of Barnes & Thornburg LLP
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CORRESPONDENCE SECTION (proposed)	
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AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
DOCKET/REFERENCE NUMBER	1127-US
SIGNATURE SECTION	
RESPONSE SIGNATURE	/MJS/
SIGNATORY'S NAME	Monica J. Stover
SIGNATORY'S POSITION	Authorized agent of attorney of record, Barnes & Thornburg LLP, Michigan Bar Member
SIGNATORY'S PHONE NUMBER	616-742-3921
DATE SIGNED	01/10/2020
AUTHORIZED SIGNATORY	YES
CONCURRENT APPEAL NOTICE FILED	YES
FILING INFORMATION SECTION	
SUBMIT DATE	Fri Jan 10 19:52:18 EST 2020
TEAS STAMP	USPTO/RFR-XXX.X.XXX.XX-20200110195218414875-877662-47-7005c68788e7b724a63968-2fe8dab6612e337e461dbef56-127de263999bc53629a5-N/A-N/A-20200110194623533363

Request for Reconsideration after Final Action

To the Commissioner for Trademarks:

Application serial no. **87766247** FRESH DELIVERED SAFE(Standard Characters, see https://tmng-al.uspto.gov/resting2/api/img/87766247/large) has been amended as follows:

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

Please see complete argument attached within the evidence section.

EVIDENCE
Evidence in the nature of Complete response arguments to Final Office Action. has been attached.
Original PDF file:
evi_107515611-20200110194623533363_._Final_FRESH_DELIVERED_SAFE_-_Response_to_Final_office_action.pdf
Converted PDF file(s) (12 pages)
Evidence-1
Evidence-2
Evidence-3
Evidence-4
Evidence-5
Evidence-6
Evidence-7
Evidence-8
Evidence-9
Evidence-10
Evidence-11
Evidence-12

The applicant's current attorney information: Eric L. Johnson. Eric L. Johnson of BERRY GLOBAL, INC., is located at

101 OAKLEY STREET
EVANSVILLE, Indiana 47710
US

The docket/reference number is 1127-US.

The phone number is 812-250-3785.

The fax number is 7046975119.

The email address is ericljohnson@berryglobal.com

The applicants proposed attorney information: Eric L. Johnson. Other appointed attorneys are Monica J. Stover and Mark J. Nahnsen, attorneys of Barnes & Thornburg LLP. Eric L. Johnson of BERRY GLOBAL, INC., is a member of the XX bar, admitted to the bar in XXXX, bar membership no. XXX, and the attorney(s) is located at

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The docket/reference number is 1127-US.

The phone number is 812-250-3785.

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Eric L. Johnson submitted the following statement: The attorney of record is an active member in good standing of the bar of the highest court of a U.S. state, the District of Columbia, or any U.S. Commonwealth or territory.

The applicant's current correspondence information: ERIC L. JOHNSON. ERIC L. JOHNSON of BERRY GLOBAL, INC., is located at

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The docket/reference number is 1127-US.

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SIGNATURE(S)
Request for Reconsideration Signature
Signature: /MJS/ Date: 01/10/2020
Signatory's Name: Monica J. Stover
Signatory's Position: Authorized agent of attorney of record, Barnes & Thornburg LLP, Michigan Bar Member

Signatory's Phone Number: 616-742-3921

The signatory has confirmed that he/she is a U.S.-licensed attorney who is an active member in good standing of the bar of the highest court of a U.S. state (including the District of Columbia and any U.S. Commonwealth or territory); and he/she is currently the owner's/holder's attorney or an associate thereof; and to the best of his/her knowledge, if prior to his/her appointment another U.S.-licensed attorney not currently associated with his/her company/firm previously represented the owner/holder in this matter: the owner/holder has revoked their power of attorney by a signed revocation or substitute power of attorney with the USPTO; the USPTO has granted that attorney's withdrawal request; the owner/holder has filed a power of attorney appointing him/her in this matter; or the owner's/holder's appointed U.S.-licensed attorney 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.

Mailing Address: ERIC L. JOHNSON
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Serial Number: 87766247
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TEAS Stamp: USPTO/RFR-XXX.X.XXX.XX-20200110195218414
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ab6612e337e461dbef56127de263999bc53629a5
-N/A-N/A-20200110194623533363

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Trademark:	FRESH DELIVERED SAFE	)	
Serial No.:	87/766,247	)	Examining Attorney
Filing Date:	January 23, 2018	)	James McNamara
Our Docket No. 5723-200		)	Law Office 127

REQUEST FOR RECONSIDERATION

Dear Examining Attorney McNamara:

This responds to the Office Action dated July 10, 2019, for U.S. Serial No. 87/766,247 for the FRESH DELIVERED SAFE mark claiming the following goods in Class 20: "*Packaging containers of plastic; plastic containers for the delivery of food or beverage from restaurants or stores, including delivery or carry-out items; rigid plastic packing containers; plastic single layer or multi-layer rigid plastic packing containers for the protection, preservation, and insulation of food or beverage during delivery from restaurants or stores, including containers for delivery and carry-out; flexible plastic containers for the food industry; plastic single layer or multi-layer flexible plastic containers for the protection, preservation, and insulation of food or beverage during delivery from restaurants or stores, including containers for delivery or carry-out; packaging containers of plastic for maintaining freshness, integrity, and temperature of food or beverage products during delivery from restaurant or store to another location; container systems for food delivery, namely, systems with individual plastic containers for storing and protecting food, and outer containers for storing and insulating the individual plastic containers*."

I. Section 2(d) Refusal – Likelihood of Confusion

The Examining Attorney has maintained the refusal for a likelihood of confusion based on the following Registration:

Mark	Owner	Goods/Services	Reg. No.
Deliver SAFE	Grand Packaging, Inc., DBA Command Packaging 3840 E 26th Street, Los Angeles, CALIFORNIA 90058	**Class 16**: merchandise bags	5,501,050

As discussed in greater detail below, Applicant respectfully disagrees that there is any potential likelihood of confusion between Applicant's FRESH DELIVERED SAFE mark and Registrant's Deliver SAFE mark because: (1) the respective marks are dissimilar in their entireties; (2) the respective goods are sufficiently distinct; (3) the relevant consumers are sophisticated and only make purchases after careful consideration; (4) the burden of proof to find a likelihood of confusion has not been met; and (5) a significant number of the *du Pont* factors weigh in Applicant's favor. As such, Applicant respectfully requests that the likelihood of confusion objection be withdrawn and the subject trademark application be approved for publication.

1. <u>The Respective Marks Are Dissimilar In Their Entireties</u>

The appropriate test for determining a likelihood of confusion is to account for "the similarity or dissimilarity of the marks in their entireties as to appearance, sound, connotation and commercial impression." TMEP § 1207.01 (citing *In re E. I. du Pont de Nemours & Co.*, 476 F.2d 1357, 177 U.S.P.Q. 563 (CCPA 1973)). *See also Shen Manufacturing Co. v. Ritz Hotel Ltd.*, 393 F.3d 1238, 73 USPQ2d 1350 (Fed. Cir. 2004) (RITZ and THE RITZ KIDS create different

commercial impressions). In comparing the marks, the Trademark Manual of Examining Procedure (TMEP) specifically provides:

> The points of comparison for a word mark are appearance, sound, meaning and commercial impression. Similarity of the marks in one respect -- sight, sound, or meaning -- will not automatically result in a finding of likelihood of confusion even if the goods are identical or closely related. See *In re Thor Tech, Inc.*, 90 U.S.P.Q. 2d 1634, 1635 (TTAB 2009).

Furthermore, for the purposes of determining a likelihood of confusion, a trademark must be considered in its entirety and not dissected into component parts. Estate of P.D. Beckwith Inc. v. Comm'n of Patents, 252 U.S. 538 (1920); In re Bed & Breakfast Registry, 791 F.2d 157, 229 U.S.P.Q. 818 (Fed. Cir. 1986) (emphasis added); Franklin Mint Corp. v. Master Mfg. Co., 667 F. 2d 1005, 212 U.S.P.Q. 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."). Thus, in this case, it is improper to dissect the respective marks, focusing solely on the shared DELIVER SAFE/DELIVERED SAFE portion of each mark and completely ignoring the other differences, particularly the additional term "FRESH" at the beginning of Applicant's mark and the prominent design element in Registrant's mark, in order to find the respective marks confusingly similar. These are important features of each mark to consider for the likelihood of confusion analysis.

Here, when properly considered in their entireties, Applicant's FRESH DELIVERED SAFE mark and Registrant's distinctive 

design mark are markedly dissimilar in appearance and commercial impression. As an initial matter, the marks begin with the wholly distinct terms FRESH and DELIVER, which clearly cause each mark to look and sound completely different from each other and convey distinct impressions. This is particularly important given that

it has been held that it is the first word of a mark that is "most likely to be impressed upon the mind of a purchaser and remembered." *Presto Products Inc. v. Nice-Pak Products, Inc.*, 9 USPQ2d 1895, 1897 (TTAB 1988); *Palm Bay* 73 USPQ2d at 1692; *Wet Seal Inc. v. FD Mgmt. Inc.*, 82 USPQ2d 1629, 1639 (TTAB 2007). The first literal element in Registrant's mark is DELIVER, while Applicant's mark begins with FRESH. Consumers will not pronounce the respective marks in the same way, and their respective pronunciations sound nothing alike. The beginnings of the respective marks, which are most likely to be impressed on the purchaser's minds, are vastly different in appearance and sound, which contributes to the overall marks in their entireties being distinct in appearance, sound, and commercial impression.

Further distinguishing the marks are their respective connotations and commercial impressions created by the distinct terms and design elements in each mark. Specifically, the distinct term "FRESH" used prominently at the beginning of Applicant's mark connotes the idea of food, and particularly the delivery of fresh food when considered in connection with the identification describing goods used for the purpose of food delivery. Notably, the term FRESH is missing from Registrant's mark. Moreover, the prominent design element in Registrant's mark cannot be ignored and certainly will not be overlooked by consumers, but rather, likely a dominant focus point. Indeed, Registrant's design element conveys a wholly distinct connotation and commercial impression different from Applicant's mark. Specifically, Registrant's mark contains a prominent lock design composing the "A" in the word "SAFE"-- 

--which, when considered in connection with its "merchandise bag" goods, plainly conveys the idea of a secure retail bag used to transport goods safely. The word elements in the mark, DELIVER SAFE, considered together with the identification of "merchandise bags" goods, reiterate this commercial

impression suggesting that the merchandise bags are given to a retail consumer to transport their goods safely after purchase.

The respective marks are intended to be read and viewed *as a whole*. When properly considering the respective marks in their entireties, as required, Applicant's FRESH DELIVERED SAFE mark is readily distinguishable from Registrant's 

design mark in appearance and commercial impression. Any remote similarity between the two marks given the shared use of the DELIVERED SAFE/DELIVER SAFE portions is outweighed by the clear contextual and visual differences in the marks, which together, serve to make the respective marks sufficiently distinct.

Therefore, for the reasons articulated above as supported by the case law, the respective marks in their entireties are not similar, are readily distinguishable, and confusion is not likely.

2. <u>The Respective Goods Are Sufficiently Distinct</u>

The differences between Applicant's and Registrant's respective goods further serve to negate any likelihood of confusion. The cumulative effect of differences in the essential characteristics of the goods involved is a fundamental inquiry mandated by Section 2(d) of the Trademark Act. *Interstate Brands Corp. v. Celestial Seasonings, Inc.*, 198 U.S.P.Q. 151, 153 (C.C.P.A. 1978). The nature and scope of a party's goods or services **must be determined on the basis of the goods or services *recited in the application or registration*.** TMEP Â 1207.01(a)(iii) *See, e.g., Hewlett-Packard Co. v. Packard Press Inc.*, 281 F.3d 1261, 62 USPQ2d 1001 (Fed. Cir. 2002); In re Shell Oil Co., 992 F.2d 1204, 26 USPQ2d 1687, 1690 n. 4 (Fed. Cir. 1993); *J & J Snack Foods Corp. v. McDonald's Corp.*, 932 F.2d 1460, 18 USPQ2d 1889 (Fed. Cir. 1991); *Octocom Systems Inc. v. Houston Computer Services Inc.*, 918 F.2d 937, 16 USPQ2d 1783 (Fed.

Cir. 1990); *Canadian Imperial Bank of Commerce, N.A. v. Wells Fargo Bank*, 811 F.2d 1490, 1 USPQ2d 1813 (Fed. Cir. 1987); *Paula Payne Products Co. v. Johnson Publishing Co.*, 473 F.2d 901, 177 USPQ 76 (C.C.P.A. 1973). Applicant submits that Registrant's and its own narrowly identified goods are so different that confusion is not likely.

A review of the respective goods involved *as described in their respective identifications*—as required, plainly reveals that Registrant's "merchandise bags" in Class 16 are wholly unrelated to Applicant's identified plastic container and packing system goods in Class 20.

Applicant Berry Global, Inc. ("Applicant") is a leading global manufacturer and marketer of various plastic materials and consumer packaging made of plastics, who, under its mark, will offer customized plastic packing containers and systems used specifically for the purpose of food and beverage delivery services by restaurants. As stated directly in Applicant's identification of goods, the intended purpose of Applicant's plastic container goods is for the delivery of fresh food and beverages.

In stark contrast, Registrant's good are **merchandise bags**, as identified in Registrant's identification of goods. "Merchandise bags" are defined in the U.S. Trademark Office Identification Manual as follows: "Merchandise bags are the paper or plastic bags that retail stores give to consumers to carry the purchased items." Term ID 016-303. These paper or plastic bags given to consumers to carry their purchased retail items out of a retail store location are dramatically different than Applicant's plastic packing goods and systems specifically used for the delivery of food and beverage items, as stated in Applicant's identification of goods. Indeed, they do not serve the same purpose or even compliment each other in any way, and are not used by the same consumers.

Further, there is insufficient evidence of record to demonstrate that Applicant's and Registrant's goods are sufficiently related to establish a likelihood of confusion—that is, more than a theoretical possibility of confusion. The Trademark Office must provide sufficient evidence showing that the goods are related to support a finding of likelihood of confusion. *See, e.g., In re White Rock Distilleries Inc.*, 92 USPQ2d 1282, 1285 (TTAB 2009) (finding Office had failed to establish that wine and vodka infused with caffeine are related goods because there was no evidence that vodka and wine emanate from a single source under a single mark or that such goods are complementary products that would be bought and used together). It is insufficient to point to the general supply/storage/shipping, etc. stores such as ULINE and Dean Supply to demonstrate relatedness of the respective goods. This is the equivalent of citing to a "big box" department store and arguing goods are similar because both can be found on the shelves of that store. Certainly, considering these stores offer such a wide array of goods ranging from boxes to labels to plastic and paper bags to cleaning and janitorial supplies to cookware, etc., it is simply too tenuous a connection to say the respective goods at issue are similar because consumers could encounter them both at these stores.

In view of the specific differences between the goods and the lack of relevant evidence, the Examining Attorney has not met the burden of establishing that confusion is likely to occur.

3. <u>The Relevant Purchasers Are Sophisticated And Only Make Purchases After Careful Consideration</u>

In addition to the distinctions between the respective marks and their claimed goods, further negating a likelihood of confusion is the sophistication of the relevant purchasers.

The Federal Circuit has made it clear that purchaser "sophistication is important and often dispositive because sophisticated consumers may be expected to exercise greater care." *Electronic Design & Sales*, 21 USPQ2d at 1392 (Fed. Cir. 1992). Applicant's and Registrant's goods—sold

on a business-to-business platform and in large, bulk quantities to companies—are expensive and only purchased by sophisticated consumers—not on impulse or on a whim—but only after careful consideration, thereby preventing any likelihood of confusion. "[T]here is always less likelihood of confusion where goods are expensive and purchased after careful consideration." *Astra Pharmaceutical Products, Inc. v. Beckman Instruments, Inc.*, 718 F.2d 1201, 1206 (1st Cir. 1983). Circumstances suggesting care in purchasing tends to minimize the likelihood of confusion. TMEP § 1207.01(vii).

In the present case, the circumstances certainly suggest care in purchasing and thus tend to minimize the likelihood of confusion. Importantly, both Applicant and Registrant's goods are sold exclusively on a business-to-business platform to different types of companies that serve wholly distinct purposes. Specifically, Applicant offers its plastic packing containers and systems to restaurants that deliver fresh food, and Registrant offers its merchandise bags to retail stores that sell merchandise and provide a bag to their customers for holding their purchased items. These consumer companies place orders in large quantities and according to customized specifications to suit their respective business needs and then use the goods for their own purposes in the running of their business with their own consumers.

These are not every day "impulse" purchases off the shelf, but rather special purchases in which consumers can be expected to pay particular attention and make a careful examination of the product before buying. These types of customized products and orders, at these higher end prices due to bulk ordering, clearly would only be purchased by sophisticated purchasers with specialized knowledge and familiarity in the industry, after great care and deliberation. *Standard Knitting Ltd. v. Toyota Jidosha Kabushiki Kaisha*, 77 U.S.P.Q.2d 1917 (TTAB 2006) ("[I]t is clear that automobiles are expensive and would only be purchased after careful consideration, thereby

reducing the risk of confusion."). In making purchasing decisions regarding such important and expensive goods, "the reasonably prudent person standard is elevated to the standard of the 'discriminating purchaser.'" *Weiss Associates, Inc. v. HRL Associates, Inc.*, 902 F.2d 1546, 14 USPQ2d 1840, 1841 (Fed. Cir. 1990).

As the court explained in *Du Pont*, where a prospective purchaser is likely to exercise a high degree of care or sophistication when selecting goods or services, there is less chance that confusion, mistake, or deception will occur between two or more competing marks. *See also TCPIP Holding Co., Inc. v. Haar Communications, Inc.*, 244 F.3d 88, 102 (2d Cir.2001) ("The more sophisticated the consumers, the less likely they are to be misled by similarity in marks.");*Cadbury Beverages, Inc. v. Cott Corp.*, 73 F.3d 474, 480 (2d Cir.1996) ("The sophistication factor recognizes that the likelihood of confusion between the products at issue depends in part on the sophistication of the relevant purchasers."). Furthermore, the degree of care factor plays a significant role in minimizing potential confusion where the subject goods fail to constitute "impulse" goods. *See, e.g., Astra Pharm. Prods. Inc. v. Beckman Instruments, Inc.*, 718 F.2d 1201, 1206 (1st Cir. 1983) (finding that blood analyzers that cost between $35,000 to $60,000 require careful consideration likely to result in added consumer scrutiny and examination). Accordingly, it is highly unlikely that any purchaser of Applicant's or Registrant's goods would be confused as to the source of these important and expensive bulk-order goods that are purchased with a high level of discrimination and only by retailers with a specific need for each product, namely, restaurants for Applicant's food delivery related goods and retail merchandise shops for Registrant's merchandise bags.

As such, and as described above, the required level of sophistication and exercise of high degree of care, coupled with the differences in the marks in their entireties and the differences in

the respective goods, helps to assure that no confusion is likely. Any potential likelihood of confusion is *de minimus*. Therefore, Applicant respectfully requests that the Examining Attorney withdraw the likelihood of confusion objection and allow Applicant's mark to proceed to publication.

4. A Significant Number of the *du Pont* Factors Weigh Heavily in Applicant's Favor

In *du Pont*, the Court of Customs and Patent Appeals analyzed a likelihood of confusion by considering the following factors. These factors are each addressed below, in relation to the present case:

FACTOR	ANALYSIS	WHO'S FAVOR
Similarity of Marks	Not similar when properly considered in their entireties—Applicant's FRESH DELIVERED SAFE mark is sufficiently distinct from Registrant's Deliver SAFE mark in both appearance and commercial impression and connotation.	Applicant
Similarity of the goods	Not similar. Applicant's goods, as amended, are plastic packing containers used for maintaining the freshness, integrity, and temperature of food and beverages during delivery from restaurants, while Registrant's identified goods are "merchandise bags", the two being wholly different from one another.	Applicant
Sophistication of purchasers	Both Applicant and Registrant's goods are offered exclusively to business entities looking for customized products in large quantities for their own further manufacture and distribution to retailers, and these purchasers are sophisticated and making expensive purchases in which they are unlikely to be confused as to the	Applicant

	source of the goods they're purchasing.	
Market interface between applicant and the owner of the registration	No evidence of record.	Applicant
Extent of potential confusion, i.e., whether *de minimis* or substantial.	*De minimus.*	Applicant
Fame of the prior mark.	No evidence of record.	N/A

Not only do the majority of the *du Pont* factors weigh in Applicant's favor, but those in its favor (lack of similarity of goods, lack of similarity of marks, sophistication of purchasers, *de minimus* potential confusion) weigh heavily in Applicant's favor. When properly compared in their entireties, the marks are sufficiently dissimilar such that confusion as to the source of the respective goods offered under the respective marks is not likely to occur. Therefore, the evidence now of record, taken as a whole, establishes that confusion is not likely.

5. <u>The Burden of Proof to Find a Likelihood of Confusion Has Not Been Met</u>

The Trademark Office must meet its burden of proving that Applicant's mark, when used in connection with the Applicant's goods, so resembles the Registered mark when used with Registrant's goods, as to be likely to cause confusion, to cause mistake, or to deceive the relevant purchasing public. *See In re Giovanni Food Co.,* 97 U.S.P.Q.2d 1990, 1991 (T.T.A.B. 2011) ("[W]e determine that the Office has not met its burden of proving likelihood of confusion"); *see also* See also 15 U.S.C. §1052(d). A refusal should be based on comparison of the *entire* marks, an *understanding of the relevant industries*, an *analysis of the marketplace*, and the likely reaction of prospective purchasers. Substantial evidence is now before the Trademark Office to show that confusion is not likely. To maintain this refusal in view of these submissions, significant contrary evidence would be necessary.

Therefore, Applicant respectfully requests that the Examining Attorney withdraw the objection and allow the subject application to proceed to publication.

Conclusion

All matters in the Office Action having been addressed above, Applicant respectfully requests the Examining Attorney withdraw the objection and pass Applicant's FRESH DELIVERED SAFE mark to publication.

Dated: January 10, 2020

Respectfully submitted,

By:/Monica J. Stover/

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