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U.S. Application Serial No. 90004393

Mark: CHOICE

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EXAMINING ATTORNEY'S APPEAL BRIEF

INTRODUCTION

Applicant has appealed the final refusal to register the mark "CHOICE" in standard characters based on the likelihood of source confusion with the marks in U.S. Registrations Nos. 3884422, 5167943, 5728013, 4432795, 2764342, 3754752, 2553756, and 2537150 based on Section 2(d) of the

Trademark Act. See 15 U.S.C. §1052(d); 37 C.F.R. §2.63(b). The examining attorney respectfully requests that the refusal be affirmed.

STATEMENT OF FACTS

Applicant filed an application on June 19, 2020, for registration on the Principal Register of “CHOICE” in standard characters for “collectible trading cards; sports trading cards” in International Class 016. On September 18, 2020, the examining attorney issued an Office action refusing registration under Section 2(d) of the Trademark Act based on the likelihood of confusion with the marks in eight registrations (owned by four registrants). See, 15 U.S.C. §1052(d); TMEP §§1207.01 *et seq.*. The registrations are:

Marks Owned by Major League Baseball Players Association

- U.S. Registration No. 2537150, consisting of “PLAYERS CHOICE” as a typed drawing, for “trading cards, stickers, posters, decals, post cards, calendars, mounted and unmounted photographs, book covers, paper pennants, stationary type portfolios, magazines in the field of sports and sports trading cards” in International Class 016;
- U.S. Registration No. 3884422, consisting of “PLAYERS CHOICE CLUB” in standard characters, for goods in International Classes 009, 035, and 028, and significantly for “trading cards, namely, paper and cardboard trading cards; photographs, namely, mounted and unmounted photographs; stickers, posters, decals, calendars, paper pennants, and other printed matter, namely, playing cards” in International Class 016;

- U.S. Registration No. 4432795, consisting of “PLAYERS CHOICE DIAMOND CLUB” in standard characters, for goods in International Classes 009, 035, and 028, and significantly for “trading cards, namely, paper and cardboard trading cards; photographs, namely, mounted and unmounted photographs; stickers, posters, decals, calendars, paper pennants” in International Class 016;
- U.S. Registration No. 5728013, consisting of “PLAYERSCHOICE ACADEMY” in standard characters with a disclaimer of “ACADEMY”, for goods in International Classes 009 and 028, and significantly for “trading cards, namely, paper and cardboard trading cards; photographs, namely, mounted and un-mounted photographs; stickers, posters, decals, calendars, paper pennants; pen and pencil holders” in International Class 016; and
- U.S. Registration No. 2553756, consisting of the wording “MLB PLAYERS CHOICE” and a design of a baseball player swinging a bat (and a disclaimer of “MLB”), for goods in International Classes 025 and 025, and significantly for “Trading cards, stickers, posters, decals, post cards, calendars, mounted and unmounted photos, book covers, paper pennants, stationery-type portfolios, magazines in the field of sports and sports trading cards” in International Class 016.

Mark Owned by President’s Choice Trading Cards Inc.

- U.S. Registration No. 5167943, consisting of “PRESIDENT’S CHOICE” in standard characters, for “trading cards” in International Class 016.

Mark Owned by Choice Marketing Inc.

- U.S. Registration NO. 2764342, consisting of “CHOICE MARKETING SPORTS CARDS” in stylized font with an underline design and a disclaimer of “MARKETING SPORTSCARDS”, for “Customized trading cards for organizations and individuals” in International Class 016.

Mark Owned by The Upper Deck Company, Inc.

- U.S. Registration No. 3754752, consisting of “COLLECTOR’S CHOICE” in standard characters with a disclaimer of “CHOICE” for “Trading cards; greeting cards; blank cards; note cards; gift cards; business cards; occasion cards; stickers; albums for stickers; bumper stickers; sticker books; appliqués in the form of decals; adhesive labels; printed paper labels; printed matter, namely, magazines in the fields of entertainment and sports; books in the field of entertainment and sports; comic books; comic strips; cartoon prints; newspaper cartoons; coloring books; children's books; children's activity books; notebooks; composition books; scrapbooks; photo albums; binders; stationery; writing journals; posters; packaging, namely, blister cards; postcards; desk calendars; desk pads and desk top organizers; bookmarks; calendars; pen cases; pencil cases; lunch bags; temporary body tattoos” in International Class 016.

On February 10, 2021, the applicant filed a response arguing against the refusal, but on February 12, 2021, the Examining attorney issued a final refusal. Applicant filed two requests for reconsideration,

one dated July 28, 2021, and the other dated November 22, 2021. Both were denied, on August 17, 2021, and December 15, 2021, respectively. Applicant filed the instant appeal on August 12, 2021.

ISSUES ON APPEAL

At issue on appeal is whether applicant's mark, "CHOICE" in standard characters, when used in connection with collectible trading cards and sports trading cards, so resembles the registrant's marks in U.S. Registrations Nos. 3884422, 5167943, 5728013, 4432795, 2764342, 3754752, 2553756, and 2537150 that source confusion is likely under Section 2(d) of the Trademark Act.

ARGUMENT

I. LEGAL STANDARD

Trademark Act Section 2(d) bars registration of an applied-for mark that is so similar to a registered mark that it is likely consumers would be confused, mistaken, or deceived as to the commercial source of the goods and/or services of the parties. *See* 15 U.S.C. §1052(d). Likelihood of confusion is determined on a case-by-case basis by applying the factors set forth in *In re E. I. du Pont de Nemours & Co.*, 476 F.2d 1357, 1361, 177 USPQ 563, 567 (C.C.P.A. 1973) (called the "du Pont factors"). *In re i.am.symbolic, llc*, 866 F.3d 1315, 1322, 123 USPQ2d 1744, 1747 (Fed. Cir. 2017). However, "not all of the *DuPont* factors are relevant or of similar weight in every case." *In re Guild Mortg. Co.*, 912 F.3d 1376, 1379, 129 USPQ2d 1160, 1162 (Fed. Cir. 2019) (quoting *In re Dixie Rests., Inc.*, 105 F.3d 1405, 1406, 41 USPQ2d 1531, 1533 (Fed. Cir. 1997)).

Although not all *du Pont* factors may be relevant, there are generally two key considerations in any likelihood of confusion analysis: (1) the similarities between the compared marks and (2) the relatedness of the compared goods and/or services. See, *Federated Foods, Inc. v. Fort Howard Paper Co.*, 544 F.2d 1098, 1103, 192 USPQ 24, 29 (C.C.P.A. 1976) (“The fundamental inquiry mandated by [Section] 2(d) goes to the cumulative effect of differences in the essential characteristics of the goods and differences in the marks.”); TMEP §1207.01.

When comparing marks, they are compared in their entireties for similarities in appearance, sound, connotation, and commercial impression. *Stone Lion Capital Partners, LP v. Lion Capital LLP*, 746 F.3d 1317, 1321, 110 USPQ2d 1157, 1160 (Fed. Cir. 2014) (quoting *Palm Bay Imps., Inc. v. Veuve Clicquot Ponsardin Maison Fondee En 1772*, 396 F.3d 1369, 1371, 73 USPQ2d 1689, 1691 (Fed. Cir. 2005)); TMEP §1207.01(b)-(b)(v). “Similarity in any one of these elements may be sufficient to find the marks confusingly similar.” *In re Inn at St. John’s, LLC*, 126 USPQ2d 1742, 1746 (TTAB 2018) (citing *In re Davia*, 110 USPQ2d 1810, 1812 (TTAB 2014)), *aff’d per curiam*, 777 F. App’x 516, 2019 BL 343921 (Fed. Cir. 2019); TMEP §1207.01(b).

When comparing goods, they need not be identical or even competitive to find a likelihood of confusion. See *On-line Careline Inc. v. Am. Online Inc.*, 229 F.3d 1080, 1086, 56 USPQ2d 1471, 1475 (Fed. Cir. 2000); TMEP §1207.01(a)(i). The goods need only be “related in some manner and/or if the circumstances surrounding their marketing are such that they could give rise to the mistaken belief that [the goods] emanate from the same source.” *Coach Servs., Inc. v. Triumph Learning LLC*, 668 F.3d 1356, 1369, 101 USPQ2d 1713, 1722 (Fed. Cir. 2012) (quoting *7-Eleven Inc. v. Wechsler*, 83 USPQ2d 1715, 1724 (TTAB 2007)); TMEP §1207.01(a)(i).

When analyzing a parties’ goods for similarity and relatedness, that determination is based on the description of the goods in the application and registration(s) at issue, not on extrinsic evidence of

actual use. *See, Stone Lion Capital Partners, LP v. Lion Capital LLP*, 746 F.3d 1317, 1323, 110 USPQ2d 1157, 1162 (Fed. Cir. 2014) (quoting *Octocom Sys. Inc. v. Hous. Computers Servs. Inc.*, 918 F.2d 937, 942, 16 USPQ2d 1783, 1787 (Fed. Cir. 1990)).

II. APPLICANT'S GOODS ARE HIGHLY RELATED TO THE REGISTRANTS' GOODS, AND THE TRADE CHANNELS ARE SHARED.

All the registrations list trading cards without limitation except for U.S. Registration No. 2764342 ("CHOICE MARKETING SPORTSCARDS" owned by Choice Marketing Inc.), which broadly lists "customized trading cards for organizations and individuals." The broad wording of "trading cards" presumably encompasses all trading cards. The broad wording of "customized trading cards for organizations and individuals" presumably also encompasses all trading cards, as presumably consumers could customize any trading cards, and "organizations and individuals" refers to any consumer. Thus, the applicant's sports trading cards and collectible trading cards must be presumed to be legally identical to the broadly worded trading cards in all the cited registrations. *See, e.g., In re Solid State Design Inc.*, 125 USPQ2d 1409, 1412-15 (TTAB 2018).

Additionally, other than the customized trading cards discussed above, the registrants' and the applicant's trading cards have no restrictions as to nature, type, channels of trade, or classes of purchasers and are "presumed to travel in the same channels of trade to the same class of purchasers." *In re Viterra Inc.*, 671 F.3d 1358, 1362, 101 USPQ2d 1905, 1908 (Fed. Cir. 2012) (quoting *Hewlett-Packard Co. v. Packard Press, Inc.*, 281 F.3d 1261, 1268, 62 USPQ2d 1001, 1005 (Fed. Cir. 2002)).

Thus, not only are the parties' goods highly related, but applicant's goods are legally identical to the registrants' goods, and the trade channels overlap.

III. APPLICANT'S MARK IS HIGHLY SIMILAR TO THE REGISTRANTS' MARKS.

Where the goods of an applicant and cited registrants are legally identical or virtually identical, the degree of similarity between the marks required to support a finding that confusion is likely declines. *See Cai v. Diamond Hong, Inc.*, 901 F.3d 1367, 1373, 127 USPQ2d 1797, 1801 (Fed. Cir. 2018) (quoting *In re Viterra Inc.*, 671 F.3d 1358, 1363, 101 USPQ2d 1905, 1908 (Fed. Cir. 2012)); TMEP §1207.01(b). As the parties' goods in this matter are legally identical, the degree of similarity between the marks required to support a finding of likely source confusion is greatly lessened. That said, the marks are still highly similar.

Marks may be confusingly similar where the same or similar terms appear in the compared marks and create a similar overall commercial impression. *See, Crocker Nat'l Bank v. Canadian Imperial Bank of Commerce*, 228 USPQ 689, 690-91 (TTAB 1986), *aff'd sub nom*; TMEP §1207.01(b)(ii)-(iii). The individual components of a mark may be weighed to determine its overall commercial impression. *In re Detroit Athletic Co.*, 903 F.3d 1297, 1305, 128 USPQ2d 1047, 1050 (Fed. Cir. 2018) ("there is nothing improper in stating that . . . more or less weight has been given to a particular feature of a mark, provided the ultimate conclusion rests on consideration of the marks in their entirety." (quoting *In re Nat'l Data Corp.*, 753 F.2d 1056, 1058, 224 USPQ 749, 751 (Fed. Cir. 1985)). In order to show how the elements of a mark affect the overall commercial impression of the mark, it is necessary to discuss one element of the mark more than another. This discussion is intended to explain how the particular element affects the overall commercial impression and why one particular element of a mark has greater effect in the overall commercial impression than another. Therefore, discussing the "CHOICE" portion of the cited registrations is necessary to illustrate how this shared element affects the overall impression of shared or related source.

Incorporating the entirety of one mark within another does not obviate the similarity between the compared marks nor does it overcome a likelihood of confusion under Section 2(d). *See, Wella Corp. v. Cal. Concept Corp.*, 558 F.2d 1019, 1022, 194 USPQ 419, 422 (C.C.P.A. 1977) (finding “CALIFORNIA CONCEPT” and surfer design and “CONCEPT” confusingly similar); TMEP §1207.01(b)(iii). Each of the cited registrations contains some element (or multiple elements) that serves to differentiate one mark from the others, but the word “CHOICE” in applicant’s mark has no other distinguishing element alongside it or incorporated into it to distinguish it from any of the registrants’ marks. This is how the registrations can co-exist at the same time that source confusion is likely between all the cited registrations and the applicant’s mark.

Looking at the applicant’s mark in its entirety leaves nothing to evaluate other than the word “CHOICE”. As applicant’s mark is a standard character mark that, by definition, could be presented in any manner of display or context, there can be no argument that the word – standing alone – would have a different meaning than when used in the context of any of the registrants’ marks. *See, e.g., Squirtco v. Tomy Corp.*, 697 F.2d 1038, 1041, 216 USPQ 937, 939 (Fed. Cir. 1983) (“the argument concerning a difference in type style is not viable where one party asserts rights in no particular display”).

Applicant argues that, because the marks owned by the Major League Baseball Players Association all include the word “PLAYERS” (which applicant asserts would indicate that all the cards involve baseball players), where “PLAYERS” is not present, consumers would understand a different source for the goods. The absence of the word “PLAYERS” in applicant’s mark does not signal that applicant’s cards do not include baseball players, or players of other sports. Rather, the evidence shows that collectable and trading cards generally include players of all sports, including hockey, soccer, baseball, track and field, basketball, football, and lacrosse. Request for Reconsideration, Nov. 22, 2021,

TSDR pp. 8, 11-12, 14-15, and 20. Consumers will not view the absence of terms used by the registrants as a signal that the parties' goods are different in kind or different in source.

In the present case, the applicant's one-word standard character mark is fully incorporated into all the registrants' marks, rendering applicant's mark identical in significant part to each cited registered mark. Applicant's mark adds nothing to the shared term to differentiate it from the registrants' marks. Rather, applicant's mark co-opts the shared term, claiming this term as a source-identifier for the applicant alone, citing the "crowded field" of "CHOICE"-formative marks in the trading card business as a license to do so.

Where there is a "crowded field," meaning that there are quantitatively significant numbers of marks for the same goods and/or services using a particular shared word, phrase, or design element, consumers do find smaller differences between marks that enable these consumers to differentiate the marks and thereby distinguish the sources of the goods or services. However, applicant's mark offers no real difference as the applicant's mark contains nothing else upon which consumers may attribute source. Applicant's mark does not create a distinct commercial impression from the registered marks because it contains a word, "CHOICE", which is significant in each of the registered marks, without adding any wording or other element that would distinguish applicant's mark from those marks. As such, applicant's mark is likely to appear to prospective purchasers as a shortened form of any one of the registrants' marks. *See, In re Mighty Leaf Tea*, 601 F.3d 1342, 1348, 94 USPQ2d 1257, 1260 (Fed. Cir. 2010) (quoting *United States Shoe Corp.*, 229 USPQ 707, 709 (TTAB 1985)).

Applicant points to the few very different situations where a mark incorporated into another mark in its near entirety was found not to create a likelihood of confusion. However, the facts are not analogous, and these cases certainly do not establish a right to co-opt a term present in a number of registrations simply because a set number of registrants' marks contain the term.

For instance, in *Gruner + Jahr USA Publishing v. Meredith Corp.*, “PARENT’S DIGEST” magazine was found not to infringe on the “PARENTS” trademark for magazines in a suit brought by the owners of “PARENTS” magazine. 991F.2d 1072, 26 USPQ2d 1583, 1587 (2d Cir. 1993). Unlike in the instant case, the mark for “PARENTS” was presented in stylized characters rather than being a standard character mark; the issue was not one of co-existence on the register, rather, it was an infringement suit between the parties; other indicia of trademark were at issue (for instance, one party used “HOW THEY GROW” while the other used “AS THEY GROW”). *Id.* The court found that the word “PARENTS” was descriptive as applied to the goods as it denoted the consumer of the magazines. *Id.* This descriptiveness was what rendered the “PARENTS” mark a weak mark rather than the crowded field that applicant suggests.

In *Knight Textile Corp. v. Jones Investment Co., Inc.*, (finding that “NORTON MCNAUGHTON ESSENTIALS” and “ESSENTIALS” could co-exist in the clothing field) the field was significantly more crowded than the field in the present matter. 75 USPQ2d 1313 (TTAB 2005). There, evidence showed 21 different owners of “ESSENTIALS”-formative marks for clothing in International Class 025. *Id.* Here, the field consists of only four different owners of “CHOICE”-formative marks for trading cards. Additionally, the issue of descriptiveness weakening the shared term was at play as the word “ESSENTIALS” was found to be “highly suggestive” for clothing, referring to certain foundational pieces of clothing. *Id.*

Here, applicant has not established that “CHOICE” is highly suggestive for trading cards, rather, applicant has specifically argued that its mark is “at-most suggestive” for trading cards, having different meanings even among the cited registrations based on the usage by the registrants.

Other cases applicant relies on for its “crowded field” argument have a significantly larger crowd than the four owners at issue here. For instance, in *Jack Wolfskin Ausrüstung Fur Draussen GmbH & Co. v. Millennium Sports, S.L.U.*, there were 14 different owners of paw print marks for clothing. 797 F.3d

1363, 116 USPQ2d 1129 (Fed. Cir. 2015). In *Juice Generation, Inc. v. GSEnters. LLC*, there were 26 different owners using both “PEACE” and “LOVE” for similar goods and services. 794 F.3d 1334, 115 USPQ2d 1671 (Fed. Cir. 2015). Where case law shows that 21, 26, or 14 constitute a crowd, four registrants are not even enough to staff a boy band.

Applicant suggests that, because multiple parties use the term “CHOICE” for trading cards, the term is inherently weak. Even if this were so, weakness does not strip a term of all source-indicative potential or render elements of a mark unworthy of protection under Section 2(d) against the registration by a subsequent user of a similar mark for closely related (or legally identical) goods. TMEP §1207.01(b)(ix); *See, King Candy Co. v. Eunice King’s Kitchen, Inc.*, 496 F.2d 1400, 1401, 182 USPQ 108, 109 (C.C.P.A. 1974).

IV. NEITHER CONSUMER SOPHISTICATION NOR THE COST OF THE GOODS INCREASES CONSUMER DECISION-MAKING TO A DEGREE THAT OVERCOMES THE LIKELIHOOD OF SOURCE CONFUSION.

For products that are relatively low-priced and subject to impulse buying, the risk of likelihood of confusion increases because purchasers of these products are held to a lesser standard of purchasing care. *In re Bay State Brewing Co.*, 117 USPQ2d 1958, 1960 (TTAB 2016) (quoting *Recot, Inc. v. Becton*, 214 F.3d 1322, 1329, 54 USPQ2d 1894, 1899 (Fed. Cir. 2000)). Casual purchasers of low-cost, every-day consumer items are generally more likely to be confused as to the source of the goods. *In re Davia*, 110 USPQ2d 1810, 1818 (TTAB 2014) (citing *Specialty Brands, Inc. v. Coffee Bean Distribs., Inc.*, 748 F.2d 669, 672, 223 USPQ 1281, 1282 (Fed. Cir. 1984)).

Applicant argues that trading cards are relatively expensive and therefore require great consumer care, rendering these goods not subject to impulse buying. However, the applicant’s evidence

shows that the goods sell anywhere from less than one dollar to \$1,123.23 for a Michael Jordan baseball rookie card. Request for Reconsideration, Nov. 22, 2021, TSDR pp. 12, 14-15, 17, 19-20, and 26. Just as Michael Jordan's talent (even in baseball) is rare, the card that sells for significant sums is also rare. The applicant's evidence clearly shows that the majority of trading cards sell for relatively insignificant sums.

Moreover, these items are sold in vending machines, at checkout stands, and in candy aisles where consumer care is low and the target consumer young and unsophisticated. Where purchasers include the general public, the standard of care for purchasing the goods is that of the least sophisticated potential purchaser. *In re FCA US LLC*, 126 USPQ2d 1214, 1222 (TTAB 2018) (citing *Stone Lion Capital Partners, LP v. Lion Capital LLP*, 746 F.3d. at 1325, 110 USPQ2d at 1163), *aff'd per curiam*, 777 F. App'x 516, 2019 BL 375518 (Fed. Cir. 2019).

Further, even though some consumers of trading cards take the hobby very seriously and are quite sophisticated or knowledgeable, this does not translate to sophistication in the field of trademarks or immunity from source confusion. TMEP §1207.01(d)(vii); *see, e.g., Top Tobacco LP v. N. Atl. Operating Co.*, 101 USPQ2d 1163, 1170 (TTAB 2011). The identity of the marks and the relatedness of the goods "outweigh any presumed sophisticated purchasing decision." *In re i.am.symbolic, llc*, 116 USPQ2d at 1413 (citing *HRL Assocs., Inc. v. Weiss Assocs., Inc.*, 12 USPQ2d 1819, 1823 (TTAB 1989), *aff'd*, 902 F.2d 1546, 14 USPQ2d 1840 (Fed. Cir. 1990)).

V. POLICY CONSIDERATIONS SUPPORT THE REFUSAL TO REGISTER APPLICANT'S MARK.

The presumption under Trademark Act Section 7(b) is that the registrant is the owner of its mark and that their use of their mark extends to all goods and/or services identified in the registration. 15 U.S.C. §1057(b). This presumption would be thwarted if a later-filing applicant is able to co-opt an

element of the registered mark simply because the element consists of a word used by another registrant who duly added elements to differentiate the marks and prevent consumer confusion. Applicant here is asking that, because “CHOICE” is used by more than one registrant in a mark for trading cards, the applicant be able to have this word as its mark without adding other indicia of source. This proprietary claim on a word used by four registrants would inhibit those registrants from making minor modifications to their marks out of fear of being refused registration if they perhaps re-order the words in their mark or re-work their mark to move the wording below a design element in the mark. Policy considerations involving the prevention of costly infringement suits and inhibition of competition should prevent such land-grabbing in neutral territory. *See, e.g., In re Abcor Dev. Corp.*, 588 F.2d 811, 813, 200 USPQ 215, 217 (C.C.P.A. 1978).

The overriding concern in a Trademark Act Section 2(d) matter is not only to prevent buyer confusion as to the source of the goods, but to protect the registrants from adverse commercial impact due to use of a similar mark by a newcomer. *See, In re Shell Oil Co.*, 992 F.2d 1204, 1208, 26 USPQ2d 1687, 1690 (Fed. Cir. 1993). Therefore, any doubt regarding a likelihood of confusion determination is resolved in favor of the registrant(s). TMEP §1207.01(d)(i); *see Hewlett-Packard Co. v. Packard Press, Inc.*, 281 F.3d 1261, 1265, 62 USPQ2d 1001, 1003 (Fed. Cir. 2002).

CONCLUSION

Applicant’s mark, “CHOICE” in standard characters, is fully incorporated into each of the cited registrations in such a way that, should applicant’s mark be allowed to register, consumers are likely to view “CHOICE” in the registrants’ marks as an indicator that applicant is the source of, or somehow affiliated with the ownership of, the registrants’ goods. When comparing applicant’s mark to the

registrants' marks, the overall impression is that of highly similar marks. An examination of the goods shows that they are legally identical. The trade channels overlap. There are no factors that override the general rule that consumer source confusion is likely where the goods are identical, the trade channels overlapping, and the marks highly similar. Accordingly, it is respectfully requested that the Trademark Trial and Appeal Board affirm the examining attorney's refusal to register the mark under Trademark Act Section 2(d).

Respectfully submitted,

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