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Filing date: **07/18/2023**

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

Proceeding no.	91273670
Party	Defendant LG Electronics Inc.
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Submission	Defendant's Notice of Reliance
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Signature	/Mark Sommers/
Date	07/18/2023
Attachments	2023-07-18 NOR 3 and Exhibit 1.pdf(3664721 bytes)

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

<p>BFA VERBURG B.V.</p> <p style="text-align:center">Opposer/Counterclaim Respondent,</p> <p style="text-align:center">v.</p> <p>LG ELECTRONICS INC.,</p> <p style="text-align:center">Applicant/Counterclaim Petitioner</p>	<p>Opposition No. 91273670</p> <p>Serial No. 88745941 Mark: WASH TOWER Filed: January 3, 2020</p>
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OPPOSER’S NOTICE OF RELIANCE NO. 3 UNDER 37 CFR § 2.122(e)

Pursuant to Trademark Rule 2.122(e) and TBMP § 704.08, Applicant LG Electronics Inc. (“Applicant”) submits of record in connection with this opposition proceeding a copy of Applicant’s web page listing Applicant’s Washer Dryer Combo products, many of which are sold under Applicant’s WASH TOWER mark. This evidence is relevant to the issue of likelihood of confusion, showing, among other things, Applicant’s goods and the high price point for Applicant’s goods.

Exhibit No.	Document Title	Date
1	https://www.lg.com/us/washer-dryer-combos	July 18, 2023

Dated: July 18, 2023

Respectfully submitted,

/Mark Sommers/
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LG Electronics Inc

CERTIFICATE OF SERVICE

I hereby certify that the foregoing APPLICANT'S NOTICE OF RELIANCE 3 UNDER 37 CFR §2.222 (e) was served by e-mail on July 18, 2023 on counsel for Opposer/Counterclaim Respondent at the following address of record:

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/Travis Smith/
Trademark Legal Assistant

EXHIBIT 1

Home / Washers & Dryers / Washer Dryer Combos



Washer Dryer Combos

Reinvent how you do laundry

See how LG washer/dryer combos can change the way you clean with the latest innovative features.

Feedback

23 Results

FILTERS

Sort By

Best Match ▾



Washer Dryer Combos



NEW



WM6500HBA
5.0 cu. ft. Mega Capacity
Smart Front Load Energy Sta...



★★★★★ (8)

\$1,399.01



NEW



WKGX301HBA
Single Unit Front Load LG
WashTower™ with Center...

★★★★☆ (7)

\$2,999.00



NEW



WM5500HVA
4.5 cu. ft. Capacity Smart
Front Load Energy Star
Washer with TurboWash®
360° and AI DD® Built-In
Intelligence



★★★★★ (19)

Feedback

Compare



NEW



WM3470CM
5.0 cu. ft. Mega Capacity Front Load Washer

★★★★★ (21)

\$1,099.00

Compare

Compare



WKHC202HBA
LG Wash Tower™ Single Unit Front Load 4.5 cu. ft. Washer...

★★★★★ (17)

\$3,099.00

Compare

Digital Dial Control LCD Display

Compare



WKGX201HRA
Single Unit Front Load LG WashTower™ with Center...

★★★★★ (2)

\$2,699.00

Compare

Feedback

Feedback



WKEX200HRA
Single Unit Front Load LG WashTower™ with Center



WKEX200HGA
Single Unit Front Load LG WashTower™ with Center



WKE100HWA
Single Unit Front Load LG WashTower™ with Center

Feedback

★★★★★ (5)

\$2,599.00

Compare



NEW



WKEX300HBA
Single Unit Front Load LG
WashTower™w. Center...

★★★★☆ (7)

\$2,899.00

Compare

★★★★☆ (14)

\$2,599.00

Compare



WKG101HWA
Single Unit Front Load LG
WashTower™ with Center...



★★★★★ (185)

\$2,299.00

Compare



★★★★★ (625)

\$2,199.00 **\$100 OFF**
~~\$2,299.00~~

Compare



WKEX200HBA
Single Unit Front Load LG
WashTower™ with Center...



★★★★★ (1440)

\$2,599.00 **\$100 OFF**
~~\$2,699.00~~

Compare

Feedback

Feedback

Feedback

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WKGX201HBA
Single Unit Front Load LG
WashTower™ with Center...



★★★★☆ (477)

\$2,699.00 **\$100 OFF**
~~\$2,799.00~~

Compare



WSGX201HNA
LG STUDIO Single Unit Front
Load WashTower™ with...

★★★★☆ (36)

\$2,899.00

Compare



SWWE50N3
LG STUDIO WashTower™
Smart Front Load 5.0 cu. ft...

☆☆☆☆☆ (0)

\$2,499.00

Compare

Feedback



WKGX201HGA
Single Unit Front Load LG
WashTower™ with Center...

★★★★☆ (8)

\$2,699.00

Compare



SWWG50N3
LG STUDIO WashTower™
Smart Front Load 5.0 cu. ft...

☆☆☆☆☆

\$2,599.00

Compare



WM3555HWA
2.4 cu.ft. Smart wi-fi Enabled
Compact Front Load All-In-...



★★★★☆ (35)

\$1,799.00

Compare

Feedback

07/18/2023



WM3998HBA
4.5 cu.ft. Smart Wi-Fi Enabled
All-In-One Washer/Dryer wit...

★★★★☆ (305)

\$2,199.00

Compare



LUWM101HWA
LG SIGNATURE Smart wi-fi
Enabled Washer/Dryer Combo

★★★★☆ (66)

\$3,199.00

Compare



WSEX200HNA
LG STUDIO Single Unit Front
Load WashTower™ with...

★★★★☆ (55)

\$2,799.00

Compare

Feedback



WM4080HBA
4.5 cu. ft. Ultra Large Capacity
Smart Front Load Energy Sta...

★★★★★ (15)



WM3488HW
2.3 cu.ft. Compact All-In-One
Washer/Dryer

★★★★☆ (322)

\$1,599.00

Feedback

Feedback



Compare

Compare

Discover the power of an LG Washer Dryer combo. With all in one washer dryer technology, you can get the job done using half the water, energy and space of a traditional side-by-side washer set. Combining the power and care of an LG Washer and Dryer is a reliable solution to limited space and limited time for laundry. LG Washer and Dryer sets are compact, powerful, and expertly designed.

The Washer and Dryer combo from LG delivers sophisticated design to elevate your home décor. Order from the stock of Washer and Dryer set on the LG US website for delivery or pickup. Browse LG Washer Dryer combos and all of our innovative home appliances and [Washing Machines](#), including [Front-Load Washing Machines](#), [Top-Load Washing Machines](#) and more.

LG's selection of Washer Dryer combos come complete with state-of-the-art technology, including SenseClean system to automatically set water levels and wash times, Sanitary Cycle to sanitize and remove stains, and Direct Drive Motors to ensure reliable performance for years to come. Each all in one washer dryer can be operated through a cutting-edge interface and embodies sophisticated LG design. Explore and see how LG is making life good.

Images may be simulated and dramatized for illustrative purposes. Actual features, functionality, and other product specifications may differ and are subject to change without notice. Prices, promotions, and availability may vary by model, store, and online. Prices subject to change without notice. Quantities are limited. Check with your local retailers for their final price and availability.



USA, English



Appliances

- Washers
- Refrigerators
- Dishwashers
- Cooking Appliances
- LG STUDIO
- Signature Kitchen Suite
- Dryers
- Washer Dryer Combos
- Styler Steam Closet
- Vacuums
- Air Conditioners
- Window Air

TV & Home Theater

- TVs
- Projectors
- Sound Bars
- Blu-ray & DVD Players
- Lifestyle Products
- TV Audio Video Accessories

Support

- Parts & Accessories
- Register a Product
- Order Status
- Software & Drivers
- Manuals & Documents
- Help Library
- Contact Us
- Easy Bluetooth Connect Guide
- Request a Repair
- LG Premium Care
- Custom Installation
- Online Chat

My Account

- My LG
- My Orders
- Track My Order
- Track Return Status

About LG

- Press Release
- Media Contacts
- Career Opportunities
- Newsletter Sign Up
- Sustainability

LG Signature

Online Chat

- Email Support
- Social Support
- /LGUSSupport
- @lgussupport



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Conditioners

Portable Air
Conditioners

Wall Air
Conditioners

Air Purifiers

Dehumidifiers

Other Appliance
Accessories

Kitchen

Laundry

Other

Audio

Sound Bars

Headphones

Earbuds

Neckbands

Speakers

Portable
Speakers

Party Speakers

Gaming Speakers

Home Upgrades

Heating & Air
Conditioning Products

Built-in Kitchen
Appliances

Computing

Laptops

Monitors

Burners & Drives

Computer Accessories

Small Business

Signage TVs

Commercial TVs

Hospitality TVs

Laptops

Monitors

Projectors

Service & Support

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How to become an LG
Servicer

Facebook Support [↗](#)

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LG Recycling Program
[↗](#)

California Cookware
Chemical Information

[↗](#)

Brand Story

LG ThinQ

Promotions

[Feedback](#)

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Mobile

Cell Phones

Mobile Accessories

Feedback

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Management Ethics
Hotline

