

The Examining Attorney has noted the existence of one prior registered trademark, registration number 3885091, for the mark KeyStone (the "Registered Mark"), owned by Blume's Solid Surface Products (the "Registrant") and that there may be a likelihood of confusion between the Applicant's mark KEYSTONE (the "Applicant's Mark") and the Registered Mark because the marks could be confusingly similar. As explained in further detail below, it is Applicant's position that there is no likelihood of confusion between Applicant's Mark and the Registered Mark because the marks are used in connection with dissimilar products.

Likelihood of confusion is synonymous with "probable" confusion; it is not sufficient if confusion is merely "possible." See *Rodeo Collection, Ltd v. West Seventh*, 812 F.2d 1215, 2 U.S.P.Q.2d 1204 (1987). The basic principle in determining confusion between marks is that marks must be compared in their entireties and must be considered in connection with the particular goods and services for which they are used. See *In Re National Data Corp.*, 753 F.2d 1056, 1058, 224 U.S.P.Q. 749, 750-51 (Fed.Cir. 1985) (emphasis added). Even if marks are phonetically similar, other elements of difference, such as dissimilarity of goods or services, may lead to a final finding of no likely confusion. See *Standard Brands, Inc. v. Eastern Shore Canning Co.*, 172 F.2d 144, 80 U.S.P.Q. 318 (4th Cir. 1949), cert. denied, 337 U.S. 925, 93 L. Ed. 1733, 69 S. Ct. 1171, 81 U.S.P.Q. 573 (1949); *Lebow Bros., Inc. v. Lebole Euroconf S.p.A.*, 503 F. Supp. 209, 212 U.S.P.Q. 693 (E.D. Pa. 1980). See also *In re Conti*, 220 U.S.P.Q. 745 (TTAB 1983) (holding that "Shear Perfection" for beauty salon services to be not confusingly similar to "Sheer Perfection" for leg makeup).

As set forth in the seminal case of *In re: E.I. duPont de Nemours & Co.*, 476 F.2d 1357, 177 U.S.P.Q. 563 (CCPA 1973), factors to be considered in evaluating whether a likelihood of confusion exists include: (1) the similarity or dissimilarity of the marks in their entireties as to appearance, sound, connotation and commercial impression; (2) the similarity or dissimilarity and nature of the goods or services as described in an application or registration or in connection with which a prior mark is in use; (3) the similarity or dissimilarity of established, likely-to-continue trade channels; (4) the conditions under which and buyers to whom sales are made, *i.e.*, "impulse" vs. careful, sophisticated purchasing; (5) the fame of the prior mark (sales, advertising, length of use); (6) the number and nature of similar marks in use on similar goods; (7) the nature and extent of any actual confusion; (8) the length of time during and conditions under which there has been concurrent use without evidence of actual confusion; (9) the variety of goods on which a mark is or is not used (house mark, "family" mark, product mark); (10) the market interface between applicant and the owner of a prior mark; (11) the extent to which applicant has a right to exclude others from use of its mark on its goods; and (12) the extent of potential confusion, *i.e.*, whether de minimis or substantial.

In the present matter, applying the *duPont* factors described above, there is no danger that Applicant's Mark would be confused with the Registered Mark.

Under the first du Pont factor, the Registered Mark uses a distinctive capitalization scheme (only the letters "K" and "S" are capitalized) whereas the Applicant's mark uses capital letters throughout the entire mark. (See Exhibit 1).

Under the second du Pont factor, the principal use of the Applicant's Mark in Class 11 is in connection with electric appliances namely, refrigerators, freezers, air conditioners, dehumidifiers, stoves, microwaves, washers, dryers, toasters, blenders, coffee makers, deep fryers, Panini presses, griddles, wine chillers/coolers, small refrigeration units, rice cookers, bread makers, electric fans, cook tops, range tops, wall ovens, microwave ovens, steam ovens, convection ovens, mixers, range hoods, and portable electric heaters. Based on our review of the registration and actual use of the Registered Mark, however, it is apparent that the Registered Mark is used solely on and in connection with solid surfaces (such as kitchen counters) and vanity sink bowls made of a variety of materials. As evidenced in Registrant's website ([www.blumes.net](http://www.blumes.net)) and registration with the USPTO, the Registered Mark is not used in connection with any electric appliances. (See Exhibit 2). Further, the goods offered in connection with the Registered Mark are exclusive, highly customized and unique as compared to the goods offered by Applicant. Applicant's goods are not customized. Each electric appliance has fixed dimensions and will be mass produced (i.e., without customer input and without custom specifications). Even though both marks would be registered in international class 11, there is no likelihood of confusion between the marks because Registrant's and Applicant's goods are very different from one another (i.e., mass-produced electric appliances versus made-to-order kitchen countertops and sinks). Therefore, it is unlikely that there will be actual confusion between the marks.

Under the third du Pont factor, the Applicant intends to sell its goods in major national chain retail stores such as Lowes, Home Depot, Ace Hardware and Sears. Based on our review of the Registrant's website, it is clear that the Registrant sells the Registered Mark strictly to wholesalers in "the Pennsylvania, West Virginia and Ohio areas." (See Exhibit 3). Further, we could not locate the Registrant's products for sale at any major national retail stores. Therefore, it is unlikely that there would be confusion between the Registrant's and the Applicant's marks within the channels of trade.

Under the fourth du Pont factor, because the Registrant's goods are only sold through wholesale channels, they will likely be purchased by professionals such as contractors and/or interior designers after careful planning and consideration of design and specifications and, therefore, such consumers are unlikely to make an "impulse" buy based on brand name alone. Similarly, although Applicant's goods will be targeted and sold directly to consumers through national retail stores, such consumers are unlikely to make an impulse buy for these types of electric appliances because of the price, size and permanency of such items.

Under the fifth and sixth duPont factors, we note that the Registered Mark gained registration status on September 21, 2010, is not "incontestable" and is not famous. In fact, based on our review of the marketplace, the Registered Mark is not a very well-known brand. Searches for "Keystone sinks" and "Keystone bowl" on Google revealed a number of hits ahead of the Registrant's products, including the top hit for Keystone Granite sinks, a company which makes sink bowls and countertops in direct competition with Registrant's products. (See Exhibit 4 and Exhibit 5). Additionally, our research revealed a number of other goods with registered and unregistered uses of the mark "Keystone" for products that would be classified in Class 11. Such marks included (i) bathtubs and bathtub enclosures ("Keystone by MAAX," a registered

trademark with USPTO registration number 3633762 - See Exhibit 6 and Exhibit 7), (ii) cabinets and vanities (“Keystone Cabinets” - See Exhibit 8), (iii) water filters (“KEYSTONE” - See Exhibit 9), (iv) sink faucets (“Keystone” - See Exhibit 10), and (v) granite countertops, tiles and sinks (“KEYSTONE GRANITE AND TILE” - See Exhibit 11). The fact that so many companies co-exist using the mark “Keystone” on goods that are registered or would otherwise be classified in Class 11 is evidence that the Registered Mark and the Registrant should not be granted wider protection for use of the “Keystone” mark beyond the goods on which such mark is being used. Further, the large number of goods bearing the mark “Keystone” shows that multiple users of the mark can co-exist in the marketplace without a likelihood of confusion.

Under the ninth duPont factor, based on the registration information of the Registered Mark and evidence on the Registrant’s website, it appears that the Registered Mark is used exclusively on countertops and sink bowls. (See Exhibit 12). As stated above, Applicant has applied for registration on electric appliances not on countertops or sink bowls. Applicant’s use of its mark in Class 11 will be limited to use in connection with electric appliances.

Under the eleventh duPont factor, Applicant recognizes that the mark “KEYSTONE” is a common word and is in use by a large number of other companies. With respect to Applicant’s goods that would be classified in Class 11, Applicant wishes only to receive protection for those goods that are electric appliances. Based on the third-party search Applicant commissioned before applying for registration, no other companies have registered the mark “KEYSTONE” in connection with electric appliances.

Finally, under the twelfth duPont factor, any possible consumer confusion would be at most de minimis, because, as stated above, contractors, interior designers and homeowners are sophisticated consumers, basing purchases on a considerable amount of research including specifications and price considerations. Because of all of the reasons stated above, but most importantly because (i) a significant number of products with the name “Keystone” co-exist in the marketplace without confusion, (ii) Registrant’s and Applicant’s goods are of a fundamentally different nature from one another, and (iii) Registrant’s and Applicant’s goods do not appear to be sold in the same channels of trade, it is unlikely that any consumers would be confused into thinking that Applicant’s goods originate from Registrant.

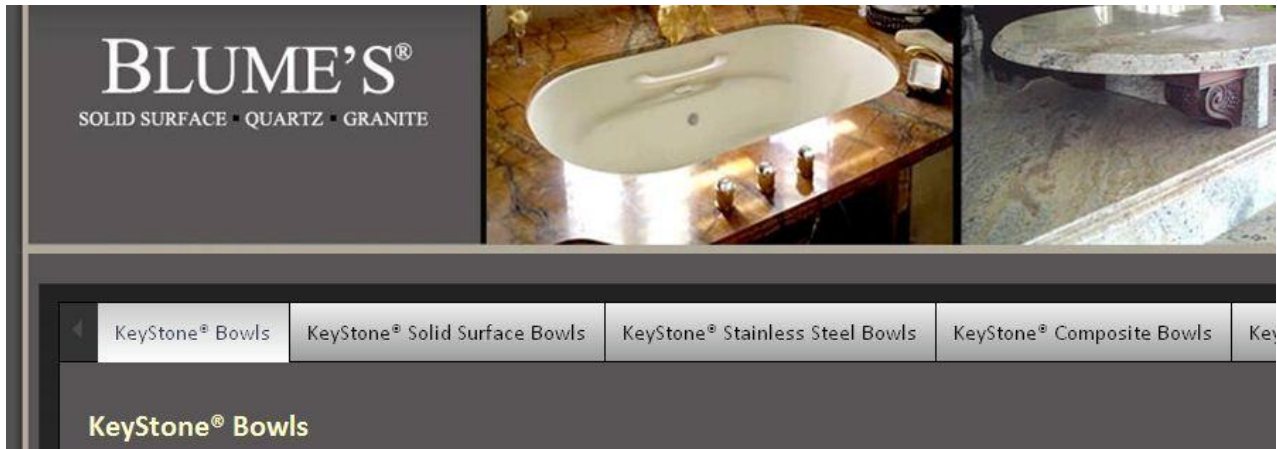
In *In re Majestic Distilling Co.*, 315 F.3d 1311, 1315, 65 USPQ2d 1201, 1204 (Fed. Cir. 2003) the court noted that “[n]ot all of the DuPont factors may be relevant or of equal weight in a given case, and ‘any one of the factors may control a particular case,’” quoting *In re Dixie Restaurants, Inc.*, 105 F.3d 1405, 1406-07, 41 USPQ2d 1531, 1533 (Fed. Cir. 1997)). While Applicant has shown above that most, if not all of the *du Pont* factors point in its favor, it is the Applicant’s view that the most important *du Pont* factors in this matter are (i) the exclusivity of the Registrant’s goods versus the Applicant’s goods (i.e., Registrant does not produce any goods that might compete with or be confused with goods to be produced by Applicant), (ii) the difference between the channels of trade used by the Registrant versus the Applicant (i.e., wholesale versus retail), (iii) the level of sophistication of potential consumers of both Registrant’s and Applicant’s goods, and (iv) the existence of a large number of other companies using the “Keystone” mark in connection with goods in Class 11.

## **Conclusion**

For the foregoing reasons, Applicant respectfully requests that the mark KEYSTONE (Serial No. 85430182) be Published for Opposition in both Class 7 and Class 11.

**Exhibit 1**

**Close-up of Registrant's website showing capitalization of Registered Mark**















## Exhibit 2

### Registrant's website showing uses of the Registered Mark on Registrant's products

**Blume's Products**

Blume's offers a wide variety of materials to meet your needs. Durability, color selection, and versatility affect the decision making of your new countertop, and Blume's strives to meet your expectations.

 KeyStone® Solid Surface	 HanStone™ Quartz Collection	 KeyStone® Granite Collection	 KeyStone® Marble	 KeyStone® Soapstone
 KeyStone® Quartz Collection	 Heritage Wood Collection	 KeyStone® Bowl Collection	 DuPont™ Zodiaq	 DuPont™ Corian
 Faucets	 Care and Maintenance Products			

**Serving Pennsylvania, Ohio, and West Virginia**

©BLUME'S® SOLID SURFACE PRODUCTS, INC. 1988 - 2011. All rights reserved.  
The Blume's and KeyStone® logos are registered trademarks of Blume's Solid Surface Products, Inc.

[Site Map](#)

### Exhibit 3

Registrant's "wholesale only" statement from Registrant's website



The top section of the website banner features the Blume's logo on the left, which includes the text "BLUME'S®" in a large serif font and "SOLID SURFACE • QUARTZ • GRANITE" in a smaller sans-serif font below it. To the right of the logo are two photographs: one showing a white oval bathtub on a marble countertop with a sink and faucet, and another showing a round marble table with a decorative base and a green upholstered chair.

**About Blume's Solid Surface**

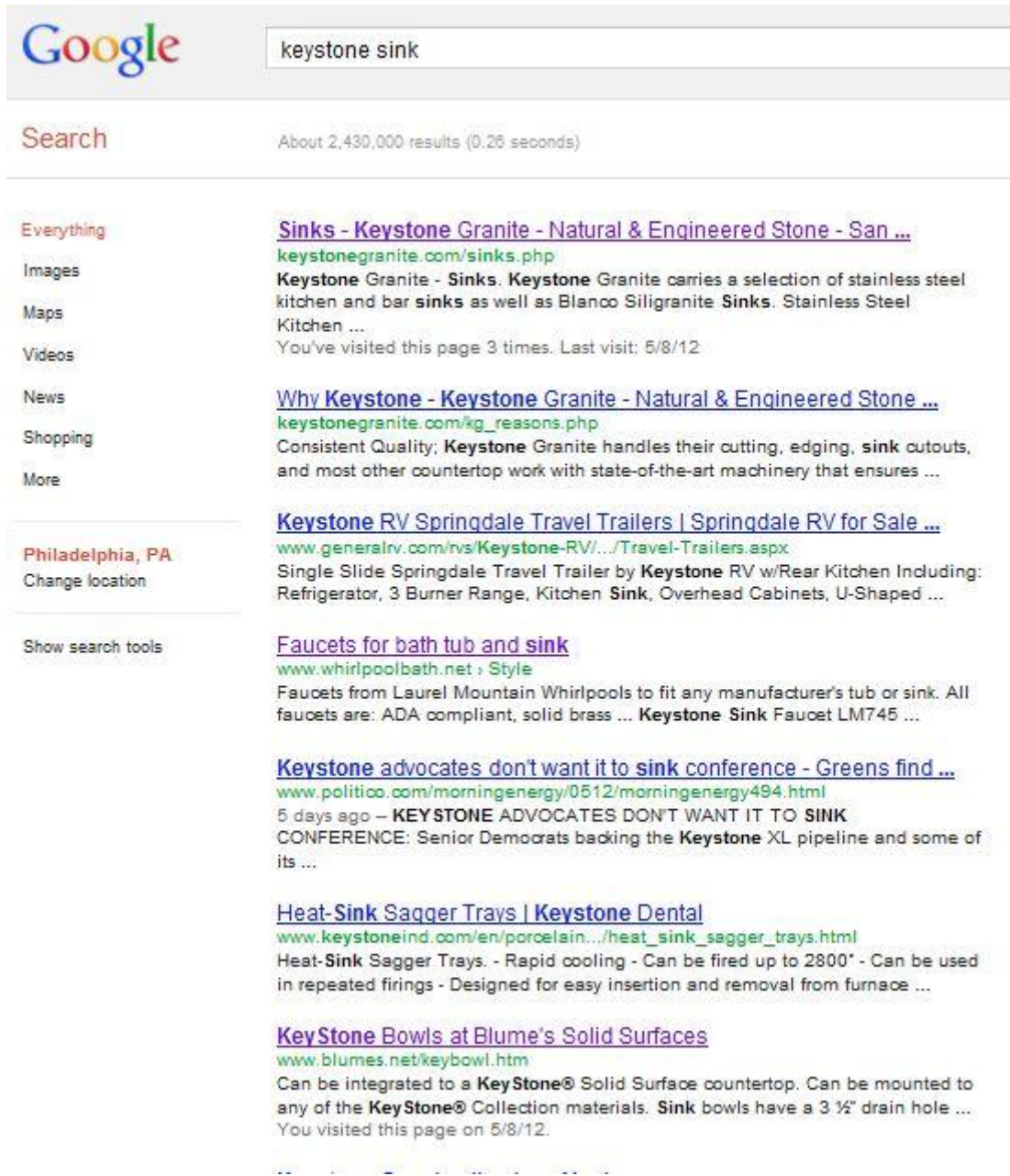
Blume's, incorporated in 1988, is a full service fabricator of solid surface, quartz and granite countertops. Whole-sale only, we fabricate and install through independent kitchen and bath dealers in Pennsylvania, Ohio and West Virginia.

- [KeyStone® Quartz](#)
- [HenStone™ Quartz](#)
- [KeyStone® Granite](#)

From its inception, Blume's quality commitment has been to "Exceed Our Customers' Expectations."

## Exhibit 4

### Results of a Google search for “keystone sink”



The image shows a screenshot of a Google search results page. At the top left is the Google logo. To its right is a search bar containing the text "keystone sink". Below the search bar, the word "Search" is displayed in red, followed by the text "About 2,430,000 results (0.26 seconds)".

On the left side of the page, there is a vertical menu with the following items: "Everything", "Images", "Maps", "Videos", "News", "Shopping", and "More". Below this menu, there is a section for "Philadelphia, PA" with a "Change location" link, and a "Show search tools" link at the bottom.


The main content area displays several search results:

- Sinks - Keystone Granite - Natural & Engineered Stone - San ...**  
[keystonegranite.com/sinks.php](http://keystonegranite.com/sinks.php)  
Keystone Granite - Sinks. Keystone Granite carries a selection of stainless steel kitchen and bar sinks as well as Blanco Siligranite Sinks. Stainless Steel Kitchen ...  
You've visited this page 3 times. Last visit: 5/8/12
- Why Keystone - Keystone Granite - Natural & Engineered Stone ...**  
[keystonegranite.com/kg\\_reasons.php](http://keystonegranite.com/kg_reasons.php)  
Consistent Quality; Keystone Granite handles their cutting, edging, sink cutouts, and most other countertop work with state-of-the-art machinery that ensures ...
- Keystone RV Springdale Travel Trailers | Springdale RV for Sale ...**  
[www.generalrv.com/rvs/Keystone-RV/.../Travel-Trailers.aspx](http://www.generalrv.com/rvs/Keystone-RV/.../Travel-Trailers.aspx)  
Single Slide Springdale Travel Trailer by Keystone RV w/Rear Kitchen Including: Refrigerator, 3 Burner Range, Kitchen Sink, Overhead Cabinets, U-Shaped ...
- Faucets for bath tub and sink**  
[www.whirlpoolbath.net](http://www.whirlpoolbath.net) › Style  
Faucets from Laurel Mountain Whirlpools to fit any manufacturer's tub or sink. All faucets are: ADA compliant, solid brass ... Keystone Sink Faucet LM745 ...
- Keystone advocates don't want it to sink conference - Greens find ...**  
[www.politico.com/morningenergy/0512/morningenergy494.html](http://www.politico.com/morningenergy/0512/morningenergy494.html)  
5 days ago – KEYSTONE ADVOCATES DON'T WANT IT TO SINK CONFERENCE: Senior Democrats backing the Keystone XL pipeline and some of its ...
- Heat-Sink Sagger Trays | Keystone Dental**  
[www.keystoneind.com/en/porcelain.../heat\\_sink\\_sagger\\_trays.html](http://www.keystoneind.com/en/porcelain.../heat_sink_sagger_trays.html)  
Heat-Sink Sagger Trays. - Rapid cooling - Can be fired up to 2800° - Can be used in repeated firings - Designed for easy insertion and removal from furnace ...
- KeyStone Bowls at Blume's Solid Surfaces**  
[www.blumes.net/keybowl.htm](http://www.blumes.net/keybowl.htm)  
Can be integrated to a Keystone® Solid Surface countertop. Can be mounted to any of the KeyStone® Collection materials. Sink bowls have a 3 ½" drain hole ...  
You visited this page on 5/8/12.



## Exhibit 5

### Results of a Google search for “keystone bowl”



---

Search About 4,290,000 results (0.31 seconds)

---

Everything

Images

Maps

Videos

News

Shopping

More


---

Philadelphia, PA  
Change location

---

Show search tools

[Norwalk, Norwalk Bowling and Events - Keystone Lanes - Norwalk](#)  
[keystonelanes.com/](http://keystonelanes.com/)  
Norwalk **Bowling** and Events, Norwalk Cosmic **Bowling**, Norwalk Public **Bowling** - **Keystone Lanes**.  
★★★★☆ 6 Google reviews - Write a review

 11459 Imperial Highway Norwalk, CA 90650  
(562) 888-3261  
Public Bowling - Cosmic Bowling - League

[Sinks - Keystone Granite - Natural & Engineered Stone - San ...](#)  
[keystonegranite.com/sinks.php](http://keystonegranite.com/sinks.php)  
Model 1300L - 6040 Double **Bowl** Sink (Big **Bowl** on Left). Model 1300R - 6040 Double **Bowl** Sink (Big **Bowl** on Right). Stainless Steel Bar Sinks; **Keystone** ...  
You've visited this page 3 times. Last visit: 5/8/12

[Keystone independence bowl - YouTube](#)  
[www.youtube.com/watch?v=up-5p9V5nFs](http://www.youtube.com/watch?v=up-5p9V5nFs)  
Jan 5, 2007 – Helicopter and ski footage i shot of the new cat ski area a **keystone**.

[Key05-Top of Keystone Bowl - YouTube](#)  
[www.youtube.com/watch?v=7-DiJBLRf#8](http://www.youtube.com/watch?v=7-DiJBLRf#8)  
Feb 8, 2007 – Everyone at the top of Keystone at the back bowls. ... **Keystone Bowls**by clearreard1074 views · south bowl keystone 0:49. Watch Later Error ...

[Ski Keystone | Keystone Snowboarding & Cat Skiing | Official ...](#)  
[www.keystoneressort.com/ski-and-.../ski-and-snowboard-explorer.aspx](http://www.keystoneressort.com/ski-and-.../ski-and-snowboard-explorer.aspx)  
Offering unique activities like night skiing, KAT snowcat skiing and riding the **bowls**, tubing and dinner sleigh rides, it's all here at **Keystone**. View of Mountain ...

[Keystone Lanes](#)  
[www.bowling2u.com/centers/find\\_detail.asp?ID=261](http://www.bowling2u.com/centers/find_detail.asp?ID=261)  
Comments: **Keystone Lanes** features 48 lanes with automatic scoring, Cosmic **Bowling**, birthday party and group packages, a full service cocktail lounge, ...  
+ Show map of 11459 Imperial Highway, Norwalk, CA 90650

[Skiing the back bowls at Keystone | Buzz Snow.com](#)  
[buzz.snow.com/.../everything-you-need-to-know-about-skiing-the-b...](http://buzz.snow.com/.../everything-you-need-to-know-about-skiing-the-b...)  
Jan 4, 2011 – Before I get ahead of myself I want to let anyone reading this know that hiking to skiing at **Keystone** or skinning or opening up the wallet will be ...

[KeyStone Bowls at Blume's Solid Surfaces](#)  
[www.blumes.net/keybowl.htm](http://www.blumes.net/keybowl.htm)  
**KeyStone® Bowls**. Blume's is highly selective of the wide variety of **bowls** available for purchase. All of the **bowls** provided are warranted with a 10-year limited ...

---

## Exhibit 6

### Keystone by MAAx – USPTO Registration

United States Patent and Trademark Office  
Home | Site Index | Search | FAQ | Glossary | Guides | Contacts | eBusiness | eBtz alerts | News | Help

Trademarks > Trademark Electronic Search System (TESS)


TESS was last updated on Wed Jun 20 04:35:46 EDT 2012

TESS HOME NEW USER STRUCTURED FREE FORM Browse Dict SEARCH OQ BOTTOM HELP

Logout Please logout when you are done to release system resources allocated for you.

Record 1 out of 1

TAB Status ASSIGN Status TDR TTAB Status ( Use the "Back" button of the Internet Browser to return to TESS)



Word Mark KEYSTONE BY MAAx  
Goods and Services IC 011, US 013 021 023 031 034, G & S: Shower doors, shower-bath doors, bath tub enclosures, shower enclosures, FIRST USE: 20060500, FIRST USE IN COMMERCE: 20070400  
IC 020, US 002 013 022 025 032 050, G & S: Mirrors; medicine cabinets, FIRST USE: 20060500, FIRST USE IN COMMERCE: 20070400  
(3) DESIGN PLUS WORDS, LETTERS, AND/OR NUMBERS  
26.03.02 - Ovals, plain single line; Plain single line ovals  
26.03.17 - Concentric ovals; Concentric ovals and ovals within ovals; Ovals within ovals; Ovals, concentric

Mark Drawing Code  
Design Search Code

Trademark Search Facility Classification Code SHAPES-OVALS Oval figures or designs including incomplete ovals and one or more ovals


Serial Number 77367165  
Filing Date January 9, 2008  
Current Basis 1A  
Original Filing Basis 1B;44D  
Published for Opposition March 24, 2009  
Registration Number 3633782  
Registration Date June 9, 2009  
Owner (REGISTRANT) MAAx US CORP. CORPORATION CANADA 160 St-Joseph Boul. Lachine, Quebec CANADA H8S2L3  
Assignment Recorded ASSIGNMENT RECORDED  
Attorney of Record Christopher J. Maier  
Priority Date November 22, 2007  
Prior Registrations 2093986,2361202,2698457,AND OTHERS  
Description of Mark Color is not claimed as a feature of the mark. The mark consists of the wording "KEYSTONE BY MAAx" in an oval design.  
Type of Mark TRADEMARK  
Register PRINCIPAL  
Live/Dead Indicator LIVE

TESS HOME NEW USER STRUCTURED FREE FORM Browse Dict SEARCH OQ TOP HELP

## Exhibit 7

### Keystone by MAAx – advertisement at Home Depot website

FREE SHIPPING\* + FREE IN STORE PICK UP + FREE RETURNS\*\*



More saving. More doing.™

Store Finder | For Pros | Get It Installed | Tool Rental | Gift Cards | Credit Center | Savings Center | How-To

My Store Location: **Asheville #3625** (Change) | Local Ad | Help | My Account (Sign in or Register)

SHOP BY DEPARTMENT

GO

CART

MY LIST

Home > Text Search > keystone bathtub

### Search Results

Showing results for "keystone bathtub"

19 Products

Sort By: Best Match





Results per page: 24

View: Grid List


Products: Online | In-Store | All Products

1

Select up to 4 items to compare. COMPARE

	<input type="checkbox"/> Select to compare	<input type="checkbox"/> Select to compare	<input type="checkbox"/> Select to compare
 <p style="font-size: x-small; margin-top: 5px;"><b>Keystone by MAAx Romance 36.5 in. x 66.5 in. x 24 in. Free-standing Bathtub with Center Drain in White</b></p> <p style="font-size: x-small;">Model 105465-108-001-103</p> <p style="font-weight: bold; font-size: small;">\$2,498.00</p> <p style="font-size: x-small;">Price includes shipping</p> <div style="background-color: #FFD700; padding: 2px 5px; border-radius: 3px; width: fit-content; margin: 0 auto;">+ ADD TO CART</div>	 <p style="font-size: x-small; margin-top: 5px;"><b>Keystone by MAAx Velvet 6054 Corner 53 7/8 in. x 59 3/4 in. x 21 in. Podium Bathtub with Front Drain in White</b></p> <p style="font-size: x-small;">Model 102745-107-001-100</p> <p style="font-weight: bold; font-size: small;">\$2,298.00</p> <p style="font-size: x-small;">Price includes shipping</p> <div style="background-color: #FFD700; padding: 2px 5px; border-radius: 3px; width: fit-content; margin: 0 auto;">+ ADD TO CART</div>	 <p style="font-size: x-small; margin-top: 5px;"><b>Keystone by MAAx Loft 6060 Corner 60 1/4 in. x 60 1/4 in. x 21 in. Podium Bathtub with Front Drain in White</b></p> <p style="font-size: x-small;">Model 105451-107-001-109</p> <p style="font-weight: bold; font-size: small;">\$2,498.00</p> <p style="font-size: x-small;">Price includes shipping</p> <div style="background-color: #FFD700; padding: 2px 5px; border-radius: 3px; width: fit-content; margin: 0 auto;">+ ADD TO CART</div>	 <p style="font-size: x-small; margin-top: 5px;"><b>Keystone by MAAx Loft 6032 IFS 31 7/8 in. x 59 3/4 in. x 20 1/2 in. Alcove Bathtub with Right-Hand Drain in White</b></p> <p style="font-size: x-small;">Model 105457-108-001-101</p> <p style="font-weight: bold; font-size: small;">\$1,877.00</p> <p style="font-size: x-small;">Price includes shipping</p> <div style="background-color: #FFD700; padding: 2px 5px; border-radius: 3px; width: fit-content; margin: 0 auto;">+ ADD TO CART</div>

SHOPPERS WHO SEARCHED THIS TERM VIEWED...




\$273.00

Keystone by MAAx Insight 30-1/2 in. x 67 in. Swing-Open Frameless Pivot ...

★★★★★ (6)

+ ADD TO CART



\$273.00

Keystone by MAAx Insight 31-1/2 in. x 67 in. Swing-Open Frameless Pivot ...

## Exhibit 8

### Use of “Keystone Cabinets”

home About Us Privacy Policy Contact Us Site Map View Cart

# Happy Valley HOME Center

Doors • Windows • Kitchen & Bath Cabinets • Flooring & More

*"Quality Home Products at Affordable Prices"*

☎: (703) 273-9850 Mon. - Thur: 10-7 Fri & Sat: 10-6

SEARCH  Go

[Home](#) > [Bathroom Products](#) > [Keystone Collection Bathroom Cabinets & Vanities](#)

## Keystone Collection Bathroom Cabinets & Vanities

View and print our Keystone Collection Bathroom Cabinet & Vanity Brochures:

- [Keystone Classic Bathroom Collection Brochure](#)
- [Keystone Heritage Collection Bathroom Brochure](#)
- [Keystone Contemporary Bathroom Collection Brochure](#)
- [Keystone Renaissance Bathroom Collection Brochure](#)
- [Keystone Decorative Bathroom Collection Brochure](#)



**Country Oak Bathroom Cabinets**



**Classic White Bathroom Cabinets**



**Heritage Country Oak Bathroom Cabinets**



**Heritage Cherry Bathroom Cabinets**



**Marquis Cinnamon Cherry Bathroom Cabinets**



**Heritage White Bathroom Vanity Cabinets**



## Exhibit 9

### Use of “KEYSTONE” for water filters

The screenshot shows the website for Freshwater Systems, Inc. The header includes the company logo, a search bar, and navigation links. The main content area features a collection of various water filters and membranes, with the word "KEYSTONE" prominently displayed below them. A detailed disclaimer is provided regarding the use of these filters in equipment with a Keystone warranty.

**freshwatersystems.com**  
serving you since 1989

Ask the Experts 877-335-3339  
Mon-Fri 8a-8p, Sat 8:30a-5p EST

Same Day Shipping!  
Click for details

SEARCH Shop By Brand

Log in Account Cart: 0

Categories: Systems, Filters, Faucets, Coolers, Fittings, UV, Pumps, Parts, Cups

Home > Replacement Water Filters > Keystone

**KEYSTONE**

Keystone® is the registered trademark of Met-Pro Corporation's Keystone Filter Division of Hatfield, PA the manufacturer of Keystone® brand water treatment equipment. Fresh Water Systems, Inc. is not associated or affiliated with Keystone® or Met-Pro Corporation. The replacement water filters and membranes listed below are not manufactured or endorsed by Keystone®. The manufacturers of these water filters and reverse osmosis membranes are oftentimes Original Equipment Mfg (OEM's) supplying to customers such as Keystone®. Although these water filters and reverse osmosis membranes are compatible for use in Keystone® water treatment equipment, we make no representation as to whether the use of compatible filters and reverse osmosis membranes complies with the warranty associated with Keystone® equipment.

ADD TO CART

## Exhibit 10

### Use of “Keystone” for faucets

**BATH Environment**  
LUXURY WHIRLPOOL SPAS

Home Style Size Manufacturer About Us How-To Site Map

BBOnline RELIABILITY PROGRAM LAPMO Whirlpool

Home > Style > Faucets

**Faucets from Laurel Mountain Whirlpools**

Looking for [faucets for freestanding and clawfoot tubs?](#)











E-mail for a Quote Today!  
[whirlpool@earthlink.net](mailto:whirlpool@earthlink.net)  
800-894-1022  
Customer Service available Sun-Fri

VISA MasterCard Discover American Express

**REQUEST OUR BEST SALE PRICE!**


These faucets will fit any manufacturer's tubs or sinks. All faucets are:


- ADA compliant
- Solid brass waterways
- Ceramic disc cartridges
- Available in Chrome, Brushed Nickel or Oil Rubbed Bronze

	<b>Bellview Metal Sink Faucet LM655</b>		<b>Bellview Metal Widespread Sink Faucet LM650</b>
	<b>Bellview Metal Roman Tub Faucet LM640</b>		<b>Bellview Porcelain Sink Faucet LM675</b>
	<b>Bellview Porcelain Roman Tub Faucet LM660</b>		<b>Bellview Porcelain Widespread Sink Faucet LM660</b>
	<b>Keystone Sink Faucet LM745</b>		<b>Keystone Sink Faucet LM750</b>
	<b>Keystone Sink Faucet LM760</b>		<b>Keystone Sink Faucet LM755</b>

## Exhibit 11

### Use of “Keystone” for granite countertops, tiles and sinks

Home About Products Sinks Gallery Testimonials Kitchen Simulator Edges Contact Free Estimate 

 >> FREE ESTIMATE CALL US AT  
Lancaster 717-394-4972 | Philadelphia 267-273-1215

## Sinks

- Countertops
  - Granite Colors
  - Marble Colors
- Tiles
  - Granite Tiles
  - Marble Tiles
  - Onyx Tiles
- Quartz Stones
  - Silestone Colors
  - Cambria Colors
  - Zodiaq Colors
  - Caesarstone Colors
- Accessories
  - Sinks
- Design Tools

**DOUBLE BOWL SINK** SK-117  
Finish: Satin Brush  
Size: 29" x 15 3/4"  
Depth: 9"

**SINGLE BOWL SINK** SK-118  
Finish: Satin Brush  
Size: 27 3/4" x 16"  
Depth: 9"

**DOUBLE BOWL SINK** SK-120  
Finish: Satin Brush  
Size: 29 1/4" x 18 1/5"  
Depth: 9 7/8"

**DOUBLE BOWL SINK** SK-121  
Finish: Satin Brush  
Size: 29 1/4" x 18 1/5"  
Depth: 9 7/8"

**BAR TOP SINK** SK-1518  
Finish: Satin Brush  
Size: 29" x 15 3/4"  
Depth: 9"

**SINGLE BOWL SINK** SK-317  
Finish: Satin Brush  
Size: 21 1/4" x 15 3/4"  
Depth: 9"

**SINGLE BOWL SINK** SK-321


**BAR TOP SINK** SK-415

Internet | Protected Mode: On

**Exhibit 12**

**Information from Registrant's website**

**BLUME'S<sup>®</sup>**  
SOLID SURFACE · QUARTZ · GRANITE



KeyStone<sup>®</sup> Bowls   KeyStone<sup>®</sup> Solid Surface Bowls   KeyStone<sup>®</sup> Stainless Steel Bowls   KeyStone<sup>®</sup> Composite Bowls


### KeyStone<sup>®</sup> Solid Surface Bowls

SBKS1311 - Bar Bowl

Sink Specifications (Inches)\*

**Overall:**  
Length: 12 3/8"  
Width: 14 7/16"

**Inside Bowl:**  
Length: 10 7/16"  
Width: 12 7/16"  
Depth: 6 1/2"



**Available Bowl Colors**

- ▶ Bone
- ▶ White

MOUNTS under solid surface, quartz, or granite tops.

Drain Opening: 3 1/2"

[Printable Copy All Solid Surface Bowls](#)

[Care & Maintenance](#)

