I. Section 2(d) Refusal.

The Examining Attorney has refused registration based on a likelihood of confusion with the mark in U.S. Reg. No. 3738571.

According to the USPTO's TSDR system, the current status of Reg. No. 3738571 is 'Registration cancelled because registrant did not file an acceptable declaration under Section 8.'. Accordingly, Applicant respectfully requests the refusal based on Reg. No. 3738571 be withdrawn.

II. Entity.

Applicant is identified as The Trustees for K Munro Family Trust, a trust organized under the laws of Australia. Applicant believes that TMEP 803.03(i) specifically does not require the individual trustees to be identified. See TMEP 803.03(i) ("The applicant must also specify the foreign country under whose laws it is organized, but no additional information is required, even if additional information would be required for a United States entity of the same name."). Accordingly, Applicant requests the requirement to identify individual trustees be withdrawn.

Dated September 19, 2016.

/Christopher J. Day/
Christopher J. Day
Attorney for Applicant