

ACTION RESPONSE 88200094 – REQUEST FOR RECONSIDERATION

Ms. Rachel Dickson
Trademark Examining Attorney
Law Office 125
9/3/2019

Dear Ms. Dickson,

Attached please find my response to this action and supporting attachments. I am responding as a principal of Virion Research Group LLC, formed in New York State. I am representing as a *pro se* and apologize upfront for any lapse in protocol and for errors made. As well, for the extent of content; however, this is a complex set of issues involving multiple companies. Despite my shortcomings, in good faith I have tried to convey my positions simply and directly.

Here I assert that upon close examination, the facts reveal products, services, customers and marketing channels are sufficiently differentiated so as not to cause a *likelihood of confusion*. I further argue that *qualified* company names are a good thing in the sense that it differentiates from the common word VIRION.

In preparing my response I had to learn about the other companies involved. I have gained a deep appreciation for the positive contributions they make. As a small, currently self-funded startup we have neither the means nor the interest in engaging in any litigation.

While unrelated and entirely independent of any trademark evaluation, it is my understanding that companies may voluntarily enter into a formal arrangement whereby minor trademark similarities are found acceptable and agreed upon. If so, as the owner of the more general internet domain **virion.com**, I would consider making it available at no expense as a landing page / dashboard to guide users to the respective websites involved here.

Thank you for your reconsideration.

Kind regards,

Paul Conlon
Virion Research Group LLC