

Serial No. 88/478,335  
Law Office 110  
Examining Attorney: Andrea Koynner Nadelman

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Re App : Louver-Lite Limited  
S. N. : 88/478,335  
Filed : June 18, 2019  
Mark : ALLUSION

January 6, 2020  
Int'l Class: 020  
Docket No. 2019-6948

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COMMISSIONER FOR TRADEMARKS  
P.O. BOX 1451  
ALEXANDRIA, VA 22313-1451

Dear Examining Attorney Nadelman:

This communication responds to the July 5, 2019 Office Action relevant to the above-captioned trademark application. One issue is raised in this Office Action: a Section 2(d) refusal based upon U.S. Reg. No. 3,437,368. This issue is discussed below.

Applicant's applied-for-mark is being refused registration under Section 2(d) based upon U.S. Reg. No. 3,437,368. The '368 registration covers the mark Illusions as used in connection with "window blinds, window shades, and venetian blinds". Applicant respectfully contends that its ALLUSION mark is clearly distinguishable from Illusions mark and that, as such, the Section 2(d) rejection should be reconsidered at this time.

With regard to the way the marks look, applicant contends that its mark, ALLUSION, is clearly distinguishable from the Illusions mark. Applicant's mark incorporates different first and last letters. This fact clearly distinguishes the marks, one from the other, with regard to the way

each mark looks. Similarly, the marks do not sound similar to one another. This is especially true given the fact that Registrant's mark is plural, and as such pronounced with a "s".

Finally, Applicant notes that the marks at issue create fully distinct commercial impressions. The words "allusion" and "illusions" are completely unrelated to one another, and are not, as such, similar in a commercial impression sense.

Based upon these facts, applicant respectfully contends that the marks at issue are not so similar in appearance, sound, connotation and commercial impression that a likelihood of confusion is present as between them.

With regard to the goods at issue in the instant application and the '368 registration, applicant notes that the goods covered by the '368 registration and the goods covered by the instant application are specialized products that will be, doubtlessly, scrutinized by prospective purchasers before they are bought. This fact also supports applicant's position that there is no likelihood of confusion present as between the marks at issue.

For the reasons discussed above, applicant respectfully contends that there is no likelihood of confusion as between its ALLUSION mark and the '368 Illusions mark. As such, applicant believes that the Section 2(d) rejection should be lifted at this time.

### **III. CONCLUSION**

Based on the above, applicant respectfully contends that this application is in condition to move forward. An early notice to that effect is respectfully requested.

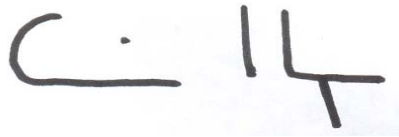
The Commissioner is authorized to charge any additional fees or refund any overpayment under 37 CFR 2.6 which may be required by this paper to Deposit Account No. 50-0789.

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Of course, contact the undersigned with any questions or comments you may have regarding the above. Otherwise, applicant looks forward to its mark being passed on to publication.

Respectfully submitted,

HAUGEN LAW FIRM PLLP

A handwritten signature in black ink, appearing to read "E. H.", is written over a light blue rectangular background.

Dated: January 6, 2020

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