

To whom it may concern:

We have recently come to learn that individuals and businesses are selling products in violation of our intellectual property rights. If you have received a notice to this effect, the violations are likely to have occurred through one or more of the following violations of federal trademark law:

- (1) Using our registered trademark, AANRAKU, to refer to your product;
- (2) Showing images of products incorporating our registered trademark cross-lines design; **and/or**
- (3) Selling a bail resembling our trademarked leaf-shaped bail designs.

Aanraku is engaged in the business of creating and selling a wide variety of innovative glass art products and goods designed for incorporating artistic material, including jewelry findings and bails. Aanraku's products are well known in the industry and amongst consumers for their proprietary design and high quality craftsmanship. Two of Aanraku's core proprietary products are its leaf-shaped pendant bail and leaf-shaped earring bail. A photograph of these bails is attached as **Exhibit A**. Aanraku is the owner of the following exclusive trademark rights in these proprietary bails:

- 1) **Leaf-shaped trade dress** (see the product shapes as disclosed in **Exhibit A**). These designs have been used substantially exclusively by Aanraku since 2003 (in the case of the leaf-shaped pendant bails) and 2006 (in the case of the leaf-shaped earring bails) such that consumers readily recognize the designs as coming from Aanraku; and
- 2) **Cross-lines design mark** (U.S. Trademark Registration No. 3,594,504). A copy of the U.S. registration for this cross-lines design trademark is attached as **Exhibit B**. An image of Aanraku's leaf bails incorporating the cross-lines design mark is shown in **Exhibit C**.

It has recently been brought to our attention that a number of sellers are falsely referring to their bails as Aanraku bails **and/or** offering leaf-shaped bails for sale that imitate Aanraku's exclusive design trademark(s). As a result, consumers are likely to be confused or mistaken as to the source of the goods or as to an affiliation with Aanraku. This activity constitutes trademark infringement and unfair competition under applicable state and federal law. Aanraku is being damaged by this unlawful activity and is undertaking all steps it deems necessary and appropriate to protect its trademark rights, including the institution of formal legal proceedings.

Some of those who have received notices directly from us or through third parties such as Etsy, Ebay and Artfire have responded by directing our attention to others who are selling similar products. We appreciate this assistance. Please be assured that we are aggressively pursuing all parties we believe to be infringing our intellectual property rights.

If you have questions about this notice, please contact our attorneys:

John D. Minton, Esq.  
Barry J. Parker, Esq.  
Carr, McClellan, Ingersoll, Thompson & Horn  
Professional Law Corporation  
216 Park Road,  
Burlingame, California 94010  
Email: [jminton@carr-mcclellan.com](mailto:jminton@carr-mcclellan.com)

Sincerely,

Bob Smith  
General Manager, Aanraku Glass Studios

Exhibit A



Exhibit B

Int. Cl.: 14

Prior U.S. Cls.: 2, 27, 28 and 50

**United States Patent and Trademark Office**

**Reg. No. 3,594,504**

Registered Mar. 24, 2009

**TRADEMARK  
PRINCIPAL REGISTER**



CASTALINE, JEFFREY (UNITED STATES INDIVIDUAL)  
41 S. RAILROAD AVENUE  
SAN MATEO, CA 944013209

FOR: JEWELRY, IN CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).

FIRST USE 12-1-2006; IN COMMERCE 12-1-2006.

THE MARK CONSISTS OF AN IMAGE OF A OVAL SURROUNDING TWO EQUALLY SPACED HORIZONTAL LINES INTERSECTING TWO EQUALLY SPACED VERTICAL LINES.

SER. NO. 77-544,588, FILED 8-12-2008.

CAROLINE WOOD, EXAMINING ATTORNEY

Exhibit C

