

FORM TM-O**THE TRADE MARKS ACT, 1999**

**Notice of Opposition / Application for Rectification of the Register by cancelling or varying registration of a trade mark / Counter statement / Request to refuse or invalidate a trade mark under Section 25(a),(b) of Geographical Indication of Goods (Regulation and Protection)
under the Trade Marks Act**

Temp Number : 8542735

REQUEST	NOTICE OF OPPOSITION
FEE	2700
APPLICANT OR REGISTERED PROPRIETOR/OPPONENT/THIRD PARTY MAKING THE APPLICATNION/REQUEST	
Opponent Name	HINDUSTAN PENCILS PRIVATE LIMITED
Trading As	HINDUSTAN PENCILS PRIVATE LIMITED
Address	510, HIMALAYA HOUSE, 79, PALTON ROAD, MUMBAI-400 001
Service Address	17/9 WEST PATEL NAGAR, NEW DELHI - 110 008.
Mobile No	9811777625
Email address	trademarks.smsa@gmail.com
AGENT OF THE APPLICANT OR REGISTERED PROPRIETOR/OPPONMENT/THIRD PARTY AS THE CASE MAY BE(if any)	
Agent Name	SUSHANT M. SINGH & ASSOCIATES
Address	17/9 WEST PATEL NAGAR, NEW DELHI - 110 008.
Mobile No	9811777625
Nature of the Agent	Advocate
Registration No	D-483-2007
REQUEST OPPOSITION/APPLICATION IN THE MATTER OF	
DETAILS OF APPLICATION NUMBER	5138243
CLASS	35
REQUEST	NOTICE OF OPPOSITION
GROUND OF OPPOSITION	Grounds of opposition are attached separately
Date	12-04-2023 07:40 PM

Digitally Signed By
SUSHANT SINGH

for SUSHANT M. SINGH & ASSOCIATES

SUSHANT M. SINGH & ASSOCIATES

ADVOCATES & SOLICITORS

Office Address: 17/9, West Patel Nagar, New Delhi - 110008 (INDIA)

Phones : 91-11-25884832, 45045797 Fax.: 91-11-25882437

Mobile.: 9811777625, 9818897776

EM1 :: email@smsalawchambers.com, EM2 :: sushantlaw@gmail.com

April 12, 2023

The Registrar of Trade Marks
Trade Marks Registry,
Intellectual Property Office,
G.S.T. Road, Guindy,
Chennai-600032.

Re.: Notice of Opposition against the Trade Mark Application No. 5138243 dated 19.09.2021 in Class 35, in the name of Mithranjali Foundation (Proprietor), 1-4-213/7/P, 1st Floor, Laxmi Enclave, Medchal Malkajgiri, Sainikpuri, Hyderabad, Hyderabad Telangana 500062 India, Published in the Trade Marks Journal No.-2082 dated 12.12.2022 at Page 3292 of the Mark "APNACART".

Dear Sir/Madam,

We act for and on behalf of Hindustan Pencils Private Limited, having its registered office at 510, Himalaya House, 79, Palton Road, Mumbai -400001, who is the Opponent in the matter.

The present Trade Mark Application was advertised in the Trade Marks Journal No. 2082 Regular Dated 12.12.2022 at Page No. 3292.

We are filing the Opposition against the above said Trade Mark Application and to facilitate the filing we submit the following:-

1. Form TM-O.
2. Copy of the Publication.
3. Copy of General Power of Attorney.
4. Requisite fee of Rs.2700/-

You are requested to kindly take these documents on record and proceed further in the opposition matter.

Thanking you,

Yours faithfully,



(SUSHANT SINGH)

Advocate

Encl.: as above.

FORM TM-O

The Trade Marks Act, 1999




Opposition/Application for Rectification of the Register/Counter statement/Refusal or invalidation of a trademark under Geographical

Indication of Goods (Regulation and Protection) Act, 1999



[The relevant information must be filled up in colored box against the respective head]


[In case of off line filing, the form should be filed in duplicate]

1	Application or Registered Proprietor/ Opponent/ Third Party Making The Application/Request	
	[(a) Anyone from the above, must be chosen on whose behalf the Notice/Application/Request is being submitted.	
	(b) 'Applicant' or 'Registered Proprietor' here means the person who is recorded as such I TMR records in respect of the referred application or registered trademark. The 'Opponent' here means the opponent in the referred opposition proceeding or an Applicant for Rectification desiring to cancel or vary the registration of the trademark of someone else. 'Third Party' means the person who is not a party to the application/opposition/Rectification referred to.]	
	FEE	Rs.2,700/-
	NAME*	Hindustan Pencils Private Limited
	trading as:	Hindustan Pencils Private Limited
	Address:*	510, Himalaya House, 79, Palton Road, Mumbai - 400 001.
		(State: Maharashtra) (Country: India)
	Mobile No:	
	E-mail address:*	smsalawchambers@gmail.com trademarks.smsa@gmail.com
2	AGENT OF THE APPLICANT OR REGISTERED PROPRIETOR/ OPPONENT/ THIRD PARTY, AS THE CASE MAY BE, (if any)	
	Name*:	SUSHANT M. SINGH & ASSOCIATES
	Address*:	17/9 WEST PATEL NAGAR, NEW DELHI- 110008
	Mobile No*:	9811777625
	E-mail address*:	smsalawchambers@gmail.com trademarks.smsa@gmail.com
	Nature of the Agent:	Advocate
	[The applicant must choose either of the following categories-	
	1. Registered Trade Marks Agent, 2. Advocate 3. Constituted Attorney]	
	Registration No.: D/483/2007	
	[In case of authorization of agent, the address of the agent may be	


	mentioned as the address for service of the applicant/opponent/third party as the case may be]								
3.	<p style="text-align: center;">PURPOSE</p> <p><i>This column is divided in three subcategories and the same is required to be chosen by the applicant as per requirement and be filled accordingly.</i></p>								
a	<p style="text-align: center;">IN THE MATTER OF FILING OPPOSITION/RECTIFICATION</p> <table border="1" style="width: 100%;"> <tr> <td style="width: 40%;">Application/Registered Trade Mark No.</td><td style="width: 40%; text-align: center;">5138243</td><td style="width: 20%; text-align: center;">Class</td></tr> <tr> <td>Trade Mark</td><td style="text-align: center;">  </td><td style="text-align: center;">35</td></tr> </table> <p style="text-align: center;">GROUNDS OF OPPOSITION/RECTIFICATION</p> <ol style="list-style-type: none"> 1. That the opponent is a well established manufacturer of Pencils and other items of stationery and has been carrying on its business since the year 1957. The Opponent was earlier Public Limited Company and later converted into Private Limited Company. 2. That the Opponents in the year 1961 adopted the trade mark NATARAJ and Device of NATARAJ in respect of pencils and since then they have been using the trade mark NATARAJ with/ without the device of NATARAJ in respect of stationery goods. 3. That the opponent's sale of stationery goods under the trademark is substantial and their goods are sold in every nook and corner of India. They have factories at various places including Umbergaon near Vapi in Gujarat, Achhad, Near Bhilad in Maharashtra, Naroli Near Silvassa in UT of Dadra and Nagar Haveli and in Jammu in the State of Jammu and Kashmir. The opponent has sold goods under the abovesaid trademarks for considerable number. 4. That the besides its house mark NATARAJ which has more than 260 registrations and much celebrated mark APSARA having more than 290 registrations, the Opponent herein has also been adopting 			Application/Registered Trade Mark No.	5138243	Class	Trade Mark		35
Application/Registered Trade Mark No.	5138243	Class							
Trade Mark		35							


several new trademarks. One such distinctive trademark adopted by the Opponent is apNA which has been applied in various classes and formatives of the mark apNA which are duly registered in favour of the opponent. The details of the same are as under:-

S. NO.	REG. NO.	TRADE MARK	CLASS	DESCRIPTION OF GOODS
1.	3517905		9	Computer Software; Computer software for reporting daily sales and other related information, Instant messaging software; File sharing software; Communication software for electronically exchanging data, audio, video, images and graphics via computer, mobile, wireless, and telecommunication networks; Computer software for processing images, graphics, audio, video, and text
2.	3517906		16	Pencils, Erasers, Sharpeners, Foot Rulers, Leads, Mechanical Pencils, Leads for Mechanical Pencils, Drawing Pencils, Colour Pencils, Water Soluble Colour Pencils, Dry Inks, Wax Crayons, Oil Pastels, Water Soluble Pastels, Poster Colours, Water Colours, Water Colour Cakes, Water Colour Tubes, Exercise Books, Note Books, Registers, Paint Boxes (articles for use in school), Paint Brushes, Permanent Markers, Highlighters, White Board Markers, Black Board Chalks, Dustless Chalks, Gypsum Chalks, Glue Sticks, Pens including Ball Point Pens, Ball Point Pens Refills, Gel Pens, Gel Pens Refills, Ink for Ball Pen Refill, Refills, adhesives for stationery or household purposes, artist's

						materials, typewriters and office requisites (except furniture), instructional and teaching material (except apparatus), Drawing Instruments and Drawing Sets, Compasses for drawing, Divider, Copying Pencils, Glass Marking Pencils, Checking Pencils and stationery
		3.	3517907		42	Application service provider, namely, providing, hosting, managing, developing, and maintaining applications, software, web sites, and databases in the fields of wireless communication, mobile information access, and remote data management for wireless delivery of content to handheld computers, laptops and mobile electronic devices; Providing temporary use of online non-downloadable software and applications for instant messaging, voice over internet protocol (VOIP), video conferencing, and audio conferencing; Computer services, namely, creating an online community for registered users to engage in social networking; Computer services, namely, creating virtual communities for users to participate in discussions, get feedback from their peers, and engage in social, business and community networking; Computer services, namely, hosting electronic facilities for others for interactive discussions via communication networks; Providing online non-downloadable software; Computer services, namely, hosting electronic facilities for others for organizing and

						<p>conducting discussions via communication networks; Application service provider (ASP); Application service provider (ASP) services, namely, hosting computer software applications of others; Application service provider (ASP) featuring software to enable or facilitate the creating, editing, uploading, downloading, accessing, viewing, posting, displaying, tagging, blogging, streaming, linking, annotating, indicating sentiment about, commenting on, embedding, transmitting, and sharing or otherwise providing electronic media or information via computer and communication networks; Providing an online network service that enables users to transfer personal identity data to and share personal identity data with and among multiple online facilities; Providing information from searchable indexes and databases of information, including text, electronic documents, databases, graphics, electronic media, photographic images and audio visual information, on computer and communication networks; Providing temporary use of non-downloadable software applications for social networking, creating a virtual community, and transmission of audio, video, photographic images, text, graphics and data; Providing online facilities that gives users the ability to upload, modify and share audio, video, photographic images,</p>
--	--	--	--	--	--	--

						<p>text, graphics and data; Providing non-downloadable e-commerce software to allow users to perform electronic business transactions via global computer network; Computer services, in particular, application service provider featuring application programming interface (API) software to allow users to perform electronic business transactions via a global computer network; Software as a service (SAAS) services featuring software for sending electronic message alerts, for transmitting orders and sending and receiving electronic messages, and to allow users to perform electronic business transactions via a global computer network</p>
		4.	3517908		35	<p>Advertising; business management; business administration; office functions; administration of consumer loyalty programs; on-line advertising on a computer network ;provision of an on-line marketplace for buyers and sellers of goods and services; business management and organization consultancy; advisory services for business management; providing business information via a web site; computerized file management; marketing research; market studies; outsourcing services [business assistance]; presentation of goods on communication media, for retail purposes; price comparison services; procurement services for others [purchasing goods and</p>

				services for other businesses];public relations; sales promotion for others; search engine optimization for sales promotion; systemization of information into computer databases; updating and maintenance of data in computer databases; web site traffic optimization; web indexing for commercial or advertising purposes
5.	3517909		38	Telecommunication services, namely, data transmission and reception services via telecommunication networks; electronic exchange of voice, data, audio, video, text and graphics accessible via computer and telecommunication networks; instant messaging services; mobile phone communication services; communications by computer terminals; providing internet chat rooms; providing online forums; message sending ;rental of message sending apparatus; rental of modems; streaming of data ;providing telecommunications connections to a global computer network; telecommunications routing and junction services; teleconferencing services; telephone services; transmission of digital files; providing user access to global computer networks; video-on-demand transmission; videoconferencing services; voice mail services wireless broadcasting

5.

That the said mark apNA has been adopted by the Opponent from its own well renowned trademarks **AP**SARA and **NA**TARAJ by taking the

two initials there from and arriving at apNA. The said mark apNA was adopted honestly and bonafidely by the opponent on 01/04/2017 and since then it is in continuous and extensive use in relation to and connection to the software for sale of stationery goods and also the stationery goods.

6. That on account of the superiority of the goods, long, extensive and continuous user and wide advertisement, the opponent's trademark apNA has become very popular in the trade and the members of the public associate the opponent not only with their trade mark. The Opponent has been able to create immense goodwill and reputation in the said mark, which is solely associated with the Opponent.

7. By virtue of prior adoption, registration and prior user of the mark apNA coupled with staggering sales, extensive promotion and well known status, opponent has become proprietor of all statutory rights vested in the trademark the trade mark apNA to the exclusive, uninterrupted and undisturbed use of the trade mark apNA. Thus, the opponent is entitled to protection and safeguarding the said mark in respect of similar or different goods having impeccable goodwill and reputation all over India and the said Mark is a well known Trade Mark within the meaning of Section 2 (1) (zg) and Section 11 of the Trade Marks Act, 1999.

8. That in view of the aforesaid, the opponent has got all vested and statutory rights in the said trademark apNA to the exclusion of others and is entitled to protection from such entities which adopt and misuse similar kind of trademarks identical or deceptively

similar to that of the opponent.


9. That the **Applicants are seeking for registration** of the Trade


Mark  under application number

5138243 dated 19.09.2021 in respect of The bringing together, for the benefit of others, of a variety of goods, excluding the transport thereof, enabling customers to conveniently view and purchase those goods, Computerized online retail store services, Advertising and advertisement services, Online advertisements, Marketing and promotional services, Promotion and marketing of products and services through global computer networks included in **CLASS 35**.

The applicant's mark/trade name contains the mark



as essential feature is nearly identical/deceptively similar to the mark  of the opponent and in fact subsumes the opponent's mark. It is submitted that the opponent's objection is confined to the usage of the mark APNA which is nearly

identical or deceptively similar to the mark  of the opponent. Therefore, in the opposition, the applicant's trade mark is objected from the standpoint of the usage of the mark



by the applicant. The goods/services for which the applicant has applied the mark are also of the same description as that of the opponent. The services of the applicant being broad based covers the services of the applicant as the applicant nowhere describes the type of the online retailing services and promotion and advertising services. Therefore, on account of the identity of the

marks and similarity of the goods/services, the applicant's mark **APNA** is prevented from registration under section 11 (1) (a) & (b) of the Act. Further, the Applicant's mark is not only likely to deceive but also likely to cause confusion within the meaning of Section 9(2) (a) of the Trade Mark Act, 1999. Thus, the Applicant's mark simply cannot be allowed for registration.

10. It is submitted that the adoption of the mark **APNA** having the mark **apNA** as an essential feature is dishonest as the usage of the said mark by the applicant will infringe the opponent's mark and also will allow the applicant to derive unfair advantage over the goodwill of the mark **apNA** of the opponent.

11. The impugned mark of the Applicant is identical/similar with the Trademark of the Opponent. There exists an inherent likelihood of confusion and also a grave likelihood of association between the Applicant's mark **APNA** and that of the Opponent. The said identity/deceptive similarity (visual, structural as well as phonetic) to the Opponent's mark and trade name and clearly prohibits the Applicants application under Section 11 (1) (a) and Sec 11(1)(b) of the Trade Marks Act, 1999.

12. That the admittedly, the applicant's mark is a proposed to be used mark and is not backed by any user at all and the applicant's adoption for the said trade mark "**APNA**" which is confusingly similar to that of the opponent's mark, is *mala fide* at the inception. This is more so when the opponent was already having an

established trade mark of **apNA** and applicant cannot be permitted to use the mark **APNA** in respect of the same/similar goods for which the opponent is already enjoying the distinctiveness. Therefore, no subsequent user can purify the said adoption. Hence, the applicant cannot claim proprietorship of the trade mark “**APNA CART**” u/s 18 of the Act.

13. Through extensive and long use and promotion of the trade mark apNA, the same has become inherently distinctive of the goods / services of the opponent, as a result of which consumers and members of the trade have always associated, identified and recognized the said trademark exclusively with the goods of the Opponent. Thus, the trademark **APNA** containing the word **apNA** is inherently incapable of serving as the source indicator of the goods of the applicant and lacks distinctive character as per section 9 (1) of the Act.

14. Further, the Applicant’s mark is not only likely to deceive but it is also likely to cause confusion within the meaning of Section 9(2) (a) of the Trade Mark Act, 1999. Thus, the Applicants mark simply cannot be allowed for registration.

15. That the very adoption of the impugned mark by the applicant is dishonest and appears to be for the purpose of trying to encroach upon the reputation and goodwill of the opponent. The Opponent submits that the applicants have adopted the impugned mark with the intention of trading upon the goodwill and reputation of the opponent and thereby passing off their goods as the goods of the

opponent. Hence, the use and/or registration of the impugned mark will be prejudicial to public interest.

16. The trade mark apNA has over the years acquired tremendous reputation amongst the general public as it has been extensively used and advertised for a long time. And by virtue of prior adoption, prior use and extensive publicity, the trade mark apNA has become well known one. The opponent's mark WELL KNOWN has become well known within the meaning of section 11 of the Act. The Opponent's mark being a well-known trade mark in India on the date of application of the impugned mark thereby the Opponent's mark is an earlier trade mark and therefore there exists a likelihood of confusion on the part of the public. The registration of the impugned mark is likely to be contrary to the provisions of Section 11(2) of the Act. As the Opponent's mark is a well-known trade mark in India, the use of the Applicant's mark is likely to result in undue advantage of the reputation and goodwill subsisting in the Opponent's well known trade mark and would be detrimental to its well known character and reputation.

17. The registration of the impugned mark is likely to be contrary to the provisions of Section 11(3)(a) of the Act as the use of the impugned mark is liable to be prevented in a Court of Law under the law of passing off and unfair trade competition.

18. The Opponent submits that the nearly identical/deceptively similar trademark apNA or any other trade mark which is similar in any matter obviously and patently *mala fide* and shows the dishonest

intention to misappropriate the Opponent's trademark. For reasons of *mala fide* adoption, the Applicant is estopped in both law and equity from claiming proprietorship of the trademark APNA or any other trade mark which is similar in any matter. Hence, the Applicant's said application cannot be said to be *bona fide* and honest. The Applicant does not appear to have invented its mark as he has only slavishly copied the Opponent's mark. The Applicant cannot, therefore, be said to be proprietors of their mark under Section 18(1) of the Act.

19. The applicant's mark so applied for registration is identical/so closely similar to the Opponent's reputed trade mark that it would cause deception and confusion (visually and phonetically) in the course of business not only amongst members of trade but also amongst unwary consumers, students, children who can get deceived very easily. As such it would enable the Applicant's goods to be mistaken for and/ or passed off as and for the goods of the Opponents. Thus, the registration of the mark applied for is against the provisions of Section 11 (1) (a), 11 (1) (b) and Section 9 (2) (a) of the said Act

20. That even the Balance of Convenience is against the Applicants and is in favor of the Opponents in so far as the Applicant's application is *prima facie* dishonest, *mala fide* and untenable in law. Further, the Applicants have slavishly copied the mark of the Opponents and have attempted to encash in on their reputation and popularity. In this regard, it is respectfully submitted that even a single instance

of confusion / deception is enough to disentitle the Applicant's application.

21. That the preceding grounds are sufficient for disallowing the Applicant's application. Nevertheless, the opponents submits that this is a fit case for the refusal of the Applicant's application in exercise of the discretionary power vested in the Registrar of Trade Marks in order to maintain purity of the Registers and for entailing respect of the institution of Trade Marks. In any event, the Applicant's application is specifically prohibited under Section 9(1) (a), Section 9 (2) (a), Section 11 (1) (a), Section 11 (1) (b), Section 11 (2) and Section 11 (3) (a), and Section 18 of the Trade Marks Act, 1999.

The Opponent reserves the right to add and/ or to alter/ to modify or amend this Notice of Opposition.

22. In the light of the submissions made above, it is most humbly prayed that the Learned Registrar may be pleased to exercise his discretion in favor of the Opponent under Section 18(4) of the Act, by allowing the present opposition and by refusing the registration of the Application No.**5138243** dated **19.09.2021** in **class 35**. Costs of the proceedings may also kindly be awarded in favor of the Opponent.

All communications in relation to the present proceedings may be sent to the following address in India:

SUSHANT SINGH
ADVOCATE
SUSHANT M. SINGH & ASSOCIATES
17/9, WEST PATEL NAGAR
NEW DELHI-110008

Dated: 12th Day of April, 2023

HINDUSTAN PENCILS PRIVATE LIMITED



(AUTHORIZED SIGNATORY)

Through



(SUSHANT SINGH)
Advocate for the Opponent


To
The Registrar of Trade Marks
Office of the Trade Marks Registry, CHENNAI

VERIFICATION:

It is verified that at Delhi on this day of 12th Day of April, 2023 at that the contents of paragraphs 1 to 4 are based on and derived from the records of Hindustan Pencils Private Limited, which are believed to be true. The contents of paragraphs 5 to 21 are based on legal information, which I am aware of and believe to be true. Para 22 is a prayer before this Hon'ble Tribunal.



OPPONENT

4	DETAILS OF THE PERSON SUBMITTING THE APPLICATION	
	Signature	
	Name	Mr. Manoj Dabke
	Authority	Authorised signatory of HINDUSTAN PENCILS PRIVATE LIMITED
5	LIST OF DOCUMENTS ATTACHED, IF ANY	N.A.



5138243 19/09/2021

MITHRANJALI FOUNDATION

1-4-213/7/P, 1st Floor, Laxmi Enclave, Medchal Malkajgiri, Sainikpuri, Hyderabad, Hyderabad Telangana 500062 India

AN INDIAN SECTION 8 COMPANY INCORPORATED UNDER COMPANIES ACT, 2013

Address for service in India/Attorney address:

ABHISHEK PATI

c/o- Jatindra Kumar Pati, Bijayramchandrapur, w.n-17, Baripada-2, Mayurbhanj-757002, Odisha

Proposed to be Used

CHENNAI

The bringing together, for the benefit of others, of a variety of goods, excluding the transport thereof, enabling customers to conveniently view and purchase those goods, Computerized online retail store services, Advertising and advertisement services, Online advertisements, Marketing and promotional services, Promotion and marketing of products and services through global computer networks.

Subject to no exclusive right to the descriptive matters/words except substantially as shown on the form of representation..



महाराष्ट्र MAHARASHTRA

© 2019 ©

WB 931647



Sub-Treasury Officer
Kalyan

14 SEP 2020

FORM TM -M
THE TRADE MARKS ACT, 1999

Attorney's Code No.:
Proprietor's Code No.:

Form of authorization of an agent
(Section 145; Rule 19)

We Hindustan Pencils Private Limited, 510 Himalaya House, 79 Palton Road, Mumbai-400001, hereby authorize **Mr. SUSHANT SINGH, Ms. JASSIMRAN KAUR, Advocates of SUSHANT M SINGH & ASSOCIATES, 17/9 WEST PATEL NAGAR, NEW DELHI -110008**, to act as my/our agent for filing and prosecuting the registration of trademarks, renewals, amendments, oppositions, recordal of changes of ownership, names and addresses, assignments, mergers and attending all proceedings before the Registrar of Trade Marks or the Government of India and request that all notices, requisitions and communications relating thereto may be sent to such agent at the above address.





29/09/2020



29/09/2020

जोडपत्र 1

मुद्रांक वि. नं. बापतची नोंद अमुकमार्फत दिनांक : 2038

For HINDUSTAN PENCILS PVT.LTD.

मुद्रांक विक्री घेणाऱ्याचे नाव, रहिवासी पत्ता व सही :

(Signature)

हस्ते : Manoj M. Dabke Tirupati Darshan Gograswadi, Dombivli (E)

परवानाधारक मुद्रांक विक्रेत्याची सही,

व परवाना क्र. 1208041

तसेच मुद्रांक विक्रीचे ठिकाण / पत्ता : श्री. शिरीष अ. जाधव, हरिदिप बिल्डींग, बी/3,

तेल्हमजला, भाटकर रोड, डोंबिवली (पूर्व) -उपचय 421201

ज्या कारणामुळे ज्यांनी मुद्रांक खरेदी केला, त्याच कारणासाठी
मुद्रांक खरेदी केल्यापासून 6 महिन्यांत वापरणे बंधनकारक आहे.



I/We hereby ratify and agree to ratify all the acts and deeds done by our said agents.

I/We hereby revoke all previous authorizations, if any, in respect of the said proceedings.


All communications relating to this application may be sent to the following address in India:-

**SUSHANT SINGH
(ADVOCATE)
SUSHANT M. SINGH & ASSOCIATES
17/9, WEST PATEL NAGAR
NEW DELHI- 110008**

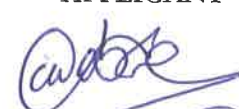
EM1 .: email@smsalawchambers.com, **EM2 .:** sushantlaw@gmail.com

Dated this 28th day of January 2021

ACCEPTED



(SUSHANT SINGH)
Advocate

APPLICANT


AUTHORIZED SIGNATORY

To
The Registrar of Trade Marks
The Office of the Trade Marks Registry
Ahmedabad/Chennai/Kolkata/Mumbai/New Delhi




BEFORE ME
N. S. PILANKAR
Advocate & Notary
Sudha Kunj, 1st Floor,
Tilak Rd., Opp. Brahman Sabha Hall,
Dombivli (E.) Dist - Thane
NOTARY REGISTER
Ar. No. 84 Dt. 5/2/2021

5 FEB 2021