



**IMPERIAL TOBACCO  
CANADA**

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Mesmin Pierre  
Director General  
Trademarks Branch  
Canadian Intellectual Property Office  
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Dear Mr. Pierre,

I am writing to you about the proposed Trademarks Regulations published in the Canada Gazette, Part I.

By way of background, I am the Senior Legal Counsel at Imperial Tobacco Canada Limited. I file and prosecute trademark applications on behalf of Imperial Tobacco Canada Limited and its affiliated companies.

I am a Canadian trademark lawyer and a Canadian trademark agent. I have been a trademark lawyer for over 15 years. In view of this background, I am very knowledgeable about Canadian trademark prosecution, among other areas.

I have considered the published Trademarks Regulations. I am very concerned about certain sections which are exceptionally difficult to understand. In fact, some of the sections appear to be incomprehensible. This is of serious concern to me since I am responsible for protecting my company's and its affiliates' trademarks. Given that I need to be confident that I clearly understand every section of the Trademarks Regulations, I am very worried that unclear wording in the regulations could result in a loss of my company's trademark rights.

The sections which appear to be the most difficult to understand are sections: 32(2), 32(3), 154(2), 155, 159 and 160.

I respectfully urge CIPO to amend the wording of those sections so that they are understandable to a typical trademark agent, clear and unambiguous.

Yours truly,

Stephen Hacikyan