



Mr. Mesmin Pierre
Director General
Trademarks Branch
Canadian Intellectual Property Office
50 Victoria Street, Room C236-10
Gatineau, Quebec
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Email: ic.cipo-consultations-opic.ic@canada.ca

March 16, 2018

Dear Mr. Pierre,

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

By way of background, I am Director of Trademarks, at Spin Master Ltd. having responsibility for the filing and prosecuting of trademark applications in Canada.

I have considered the published Trademarks Regulations and am concerned about certain sections which appear difficult to understand and interpret. This is of serious concern to me and my company since I have responsibility for protecting my company's trademarks. Given that we need to be confident that we clearly understand every section of the Trademarks Regulations, we are worried that unclear and ambiguous wording in the regulations could result in uncertainty, increased costs and potentially a negative impact on 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, clear and unambiguous. We would like the legislation to be fair and to provide predictable outcomes.

Yours sincerely,

A handwritten signature in blue ink that reads 'Katy Davis'.

Katy Davis
Director of Trademarks
Spin Master Ltd.