

**From:** [Cohen, Justin S.](#)  
**To:** [TM FR Notices](#)  
**Subject:** Requiring U.S. Licensed Attorneys for Foreign Trademark Applicants and Registrants (84 FR 4393)  
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I write to support the USPTO's proposed new rule of requiring foreign applicants to be represented by an attorney licensed in the U.S. In my experience, most companies already use lawyers to prepare and file their trademark applications, including using foreign associates for the particular jurisdiction. I believe the new rule will help improve the quality of foreign applications and help reduce the costs, time, and burden on all applicants as they pursue federal trademark registrations here in the U.S. It will also harmonize us with other countries that have a similar rule, such as China.

As the PTO has pointed out, we are seeing a rapid rise in grossly inaccurate applications, many of which are brought by pro se applicants. These inaccurate applications and registrations create a significant burden on our examining attorneys and our legitimate applicants. This new rule should help screen applications that do not meet the requirements for registration (e.g., those using doctored specimens).

In my view, the new rule does not appear to place any burden on our legitimate foreign applicants, but should address the rise of inaccurate foreign applications.

I hope the USPTO implements this new rule.

Sincerely,

~Justin S. Cohen

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