

EXHIBIT A

A LIMITED LIABILITY PARTNERSHIP

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MUMBAI, INDIA
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SUSAN J. GREENSPON

DIRECT LINE: (312) 857-7080

EMAIL: sgreenspon@kelleydrye.com

July 23, 2002

VIA FACSIMILE 650.618.1499 AND MAIL

Ms. Alana Karen
AdWords Trademark Complaints
Google
2400 Bayshore Parkway
Mountain View, CA 94043

Re: American Blind and Wallpaper Factory Trademark Complaints

Dear Ms. Karen:

We are trademark counsel to American Blind and Wallpaper Factory, Inc. d/b/a decoratetoday.com, Inc. ("ABWF"). In connection therewith, it has come to our attention that several of ABWF's competitors have purchased advertising keywords from Google that are identical or substantially similar to ABWF's registered trademarks. We understand that ABWF contacted Google to resolve this issue and was informed that Google would rectify this situation only if such competitors purchased ABWF's "full" trademark.

As you probably know, federal and state trademark law protects a trademark owner's commercial identity (goodwill, reputation and investment in advertising) by giving such owner the exclusive right to use the trademark for its goods or services. What you may not know is that trademark law also protects the trademark owner from any person or entity that uses a trademark (*i.e.* keyword, word, name, symbol or device) that so *resembles a trademark already in use as to be likely to cause confusion or mistake* in the marketplace. Furthermore, federal law protects trademarks that are unregistered.

ABWF is the owner of and has the exclusive rights to use the following trademarks registered with the United States Patent and Trademark Office ("USPTO"):

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<u>Mark</u>	<u>Reg. Number</u>	<u>Reg. Date</u>
AMERICAN BLIND & WALLPAPER FACTORY	2,022,925	12/17/96
AMERICAN BLIND FACTORY	1,463,548	11/3/87
DECORATETODAY	2,470,542	7/17/01

(See enclosed web site pages from the USPTO).

ABWF is recognized and well known in the home decorating industry and to consumers nationwide as "American Blind" and "decoratetoday." Many of ABWF's competitors have exploited the notoriety and success of ABWF, and flagrantly attempted to confuse consumers and capitalize illegally on ABWF goodwill and reputation by purchasing identical or substantially similar keywords from search engines. ABWF has been vigilant in defending its marks from infringement and dilution at all costs. As an example, ABWF was awarded in the matter of *Decoratetoday.com, Inc. (d/b/a American Blind and Wallpaper Factory, Inc.) v. American Blind & Accessory Co., Inc. and Directory One, Inc.*, Case No. 01-CV-70804-DT, a permanent injunction by the United States District Court for the Eastern District of Michigan, permanently enjoining the defendants from using ABWF's "trademarks, service marks or the word 'American' in any variation or combination with the word 'Blinds' either singular or plural...." We would be glad to send you a copy of the Permanent Injunction Order if you would like to read it in its entirety. Please note that ABWF was successful in defending not only its registered marks, but marks that were confusingly similar thereto. Consequently based upon federal law and precedent, use of the following similar marks by Google's advertisers constitutes infringement of ABWF's registered marks:

american blind	american blind wallpaper
american blind and wall covering	american blind wallpaper company
american blind and wallpaper	american blind wallpaper factory
american blind and wallpaper co	american home decorating
american blind and wallpaper company	american wall covering
american blind and wallpaper discount	american wallpaper
american blind and wallpaper factory	american wallpaper and blind
american blind and wallpaper factory	american wallpaper company
discount	american wallpaper discount
american blind and wallpaper outlet	american wallpaper factory
american blind company	americanblind
american blind discount	americanblindfactory.com
american blind factory	americanblindandwallpaperfactory

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americanhomedecorating.com
americanwallpaper
americanwallpaperfactory.com
decorate today
decorate today discount
decoratetoday

decorate today.com
decoratetoday .com
decoratetoday com
decoratetodaycom
decoratetoday.com

In light of the foregoing, we request Google to immediately (a) cease selling ABWF's proprietary marks and marks similar thereto (as set forth above), (b) remove such marks from all campaigns, and (c) remove all advertisers who have purchased such marks (including Wallpaper Wholesaler, Tuggles.net, ezblinds, USA Wallpaper, Window Designer, and Blinds Galore). Please contact the undersigned at (312) 857-7080 with regard to how you wish to proceed with this matter.

Sincerely,

Susan Greenspon

SG/sec
Enclosures

cc: Steve Katzman