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September 9, 2024

Mr. Nathan H. Leung  
[18nleung@gmail.com](mailto:18nleung@gmail.com)

Mr. Albert Kai  
[alcai@umich.edu](mailto:alcai@umich.edu)

Re: Use of LIGHTHOUSE AI Trademark

Dear Mr. Leung and Mr. Kai,

This firm represents Pharma Solutions USA, Inc. (“Pharma Solutions”) in connection with intellectual property matters. Our client has asked us to contact you regarding your use of the term “Lighthouse.AI.”

As you may be aware, Pharma Solutions offers a variety of business and consultation services to entities in the pharmaceutical and medical device industries. Since at least as early as February of 2023, Pharma Solutions has promoted its proprietary SAAS platform for researching, evaluating, tracking, and managing regulatory compliance for drug manufacturers, distributors, and related logistics providers under the trademark LIGHTHOUSEAI. Since that time, the platform has been adopted by numerous businesses throughout the country. As a result, Pharma Solutions has adopted strong common law trademark rights to the term LIGHTHOUSEAI. To further protect its rights, Pharma Solutions has also registered its LIGHTHOUSEAI mark with the U.S. Patent and Trademark Office, a copy of which is attached. More information about the LIGHTHOUSEAI platform and Pharma Solutions’ services may be seen at <https://lighthouseai.com>.

Pharma Solutions recently learned of your online Medicaid form filler platform, titled “Lighthouse.AI”, which was developed as part of the 2024 Out of Pocket Hackathon. Pharma Solutions applauds your work to improve consumer access to Medicaid benefits and takes no issue with the function or purpose of your project. However, as a trademark owner, Pharma Solutions is required to police its mark and protect both its rights and consumers from suffering confusion.

In the present case, your platform’s name is identical to Pharma Solutions’ trademark. Further, it is being used in connection with an online platform related to the execution and submission of forms in the healthcare sector, which is related to our client’s regulatory compliance platform. As a result of these similarities, our client has already experienced several instances of actual confusion among the public. As a result, continued confusion is highly likely, which constitutes trademark infringement under federal, state, and common law. Should your



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Edmund P. Wood: 1923-1968 | Truman A. Herron: 1935-1976 | Edward B. Evans: 1936-1971

development of the platform continue and expand, the potential for harm to both consumers and Pharma Solutions' rights would only increase.

Pharma Solutions has no desire to escalate this matter, but must protect its intellectual property. **Accordingly, we must request that you cease all use of the mark "Lighthouse.AI" and any other mark that is confusingly similar to Pharma Solutions' trademark. This includes on the Lighthouse.AI platform itself and on any related sites or media like Github, YouTube, etc.**

Please respond **within 30 days** to confirm that the platform and media has either been renamed or removed.

Again, while we respect and applaud your work, our client is obligated to make these requests. Nothing in this letter should be construed as a waiver of Pharma Solutions' rights or remedies. Of course, if you have any questions, please let us know. We look forward to your response.

Best regards,



Sean K. Owens

cc: Pharma Solutions USA, Inc.  
Brett Schatz, Esq.

Enc.



# United States of America

United States Patent and Trademark Office

## LIGHTHOUSEAI

**Reg. No. 7,492,922**

**Registered Sep. 03, 2024**

**Int. Cl.: 42**

**Service Mark**

**Principal Register**

Pharma Solutions USA, Inc. (PENNSYLVANIA CORPORATION)  
Suite 200  
705 Montgomery Avenue  
Penn Valley, PENNSYLVANIA 19072

CLASS 42: Software as a service (SAAS) services featuring software for researching, evaluating, tracking, and managing regulatory compliance requirements for drug manufacturers, distributors, and related logistics providers

FIRST USE 4-17-2023; IN COMMERCE 4-17-2023

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

SER. NO. 98-174,556, FILED 09-11-2023

*Katherine Kelly Vidal*

Director of the United States  
Patent and Trademark Office

