Our Ref.: 23546/G-1 ANAND AND ANAND

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(Without Prejudice)

January 20, 2016

Krishnamurthy & co. 4th Floor, Prestige Takt No. 23, Kasturba Road Cross, Bangalore - 560001

Re: Mis-use of the trademark HOUZZ

Dear Sirs,

We are in receipt to your response to our legal notice dated 16th December 2015 in relation to the mis-use of the Trademark HOUZZ which belongs to our client Houzz Inc.

At the outset, we deny each and every contention in your response which lacks legal and factual merit.

It is evident from the point of view of a reasonable man with average intelligence that the impugned HOUZIFY and HOUSIFY of Metamarket Ventures Private Limited amounts to a violation of the trademarks rights that our clients holds in the Trademark HOUZZ. Clearly, the marks HOUZIFY and HOUSIFY have been taken as an extension of our clients prior trademark HOUZZ which is famous with respect to the services which our clients currently offers.

Metamarket Ventures Private Limited has adopted an extension of our client's trademark HOUZZ with respect to identical nature of services. In fact we have also reviewed the website of your client located at www.hozzify.com ,which clearly indicates the fact that not only is the mark HOUZIFY / HOUSIFY a copy of the prior trademark HOUZZ of our client, but even the services offer by your client including the text and the colour scheme used on their website is very similar to our client's website. Clearly there is not only an overlap between the two marks but there is also a overlap between the services offered by the two entities which augments the chances of confusion in the market and dilutes the exclusivity of our client in its prior trademark HOUZZ.

We also note that you have relied upon the use of similar marks by third parties in other iurisdictions. It is clear that your client has failed to stand on its own legs and it is relying upon third parties mis-use to justify their adoption of the mark HOUZIFY / HOUSIFY which clearly intends to take advantage of the reputation and goodwill that resides in our client's trademark HOUZZ. We would also like to apprise you that our client has initiated appropriate legal action against several third parties that are trying to misuse the reputation and goodwill that resides in the prior Trademark HOUZZ of our client.

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CEO : Rojiv Maheshwari, CFO : Sanjeev Shorma, CIO : Subroto K Panda, Admin Head : Kavita Sabharwal

We are detailing below the action taken by our client against third parties that are currently misusing the trademark HOUZZ of our client in respect of identical or similar nature of goods and services.

Dispute with Li Zhencheng (HOUZZ) 14437216	Opposition Filed	China
Dispute with Ho Tran Thien My (HOUZZ) 4-2014-30686	Opposition Filed	Vietnam
Dispute with ODL, Inc. HOUZZ (86422646)	Pending litigation in U.S. District Court	United States of America
Dispute with ODL, Inc. HOUZZ (86421042)	Pending litigation in U.S. District Court	United States of America
Dispute with Lisin (HK) Co., Limited (HOUZZ and Design) 14144138 houzz	Opposition Filed	China
Dispute with Houzee for houzee No. R-270675 and houzee mieszkaj piękniej No. R-270677 and R- 270357	Opposition Filed	Poland
Dispute with Uhouzz (Tianjing) Network Technology Co. (based in China) Unouzz	We intend to oppose this application and will file an extension of the deadline on January 13, 2016.	United Kingdom

Clearly, our client is conscious about the trademark rights that vest in the trademark HOUZZ and has initiated appropriate legal action against third parties. It is denied that the trademark HOUZZ of our clients is generic or incapable of registration on account of the fact that the same has been continuously and extensively used all over the world since the year 2008. Needless to say, our client has acquired immense reputation and goodwill in the Trademark HOUZZ in relation to 'home remodelling and designing services'.

We reiterate that the proposed registration and use of the impugned marks HOUZIFY/HOUSIFY by Metamarket Ventures Private Limited is in violation of the prior trademark rights of our client and we accordingly reiterate our demands contained in our legal noted dated 15th December.

We look forward to receiving a favourable response in the matter at the earliest.

Yours sincerely,

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