**KELLEY DRYE & WARREN LLP**

NEW YORK, NY WASHINGTON, DC CHICAGO, IL HOUSTON, TX
LOS ANGELES, CA SAN DIEGO, CA PARSIPPANY, NJ STAMFORD, CT

**Michael C. Lynch**
3 World Trade Center
175 Greenwich Street
New York, NY 10007

Tel: (212) 808-5082
Fax: (212) 808-7897
mlynch@kelleydrye.com

August 10, 2026

**Via Email**

Kristine M. Young
Mayer Brown LLP
71 South Wacker Drive
Chicago, IL 60606

Re: *Meyer Corporation, U.S. and Groupe SEB USA, Inc.'s July 27, 2026 Letter*

Ms. Young:

We represent Caraway Home, Inc. ("Caraway") in connection with the pending lawsuit filed by your clients, Meyer Corporation, U.S. ("Meyer") and Groupe SEB USA, Inc. ("SEB"), captioned *Groupe SEB USA, Inc. and Meyer Corporation, US. v. Caraway Home, Inc*., Case No. 1:26-cv-1237 (S.D.N.Y.). I am writing in response to your July 27, 2026 Letter, which demands that Caraway cease and desist from alleged unlawful and infringing uses of Meyer's and SEB's registered trademarks and brand logos. Caraway does not believe there is any valid basis for your clients' demands, and therefore declines them in their entirety.

Your clients' assertions that Caraway's use of their trademarks and brand logos violates Sections 1114 or 1125(a) of the Lanham Act are meritless. No reasonable consumer could possibly mistake Caraway's advertisements—which are overtly and unmistakably critical of your clients' brands—as representing any association with or endorsement by your clients. Indeed, your claims that Caraway's use simultaneously disparages your clients' brands belies any claim that consumers are likely to be confused into believing that Caraway is associated with your clients in any way. It also belies your claims that Caraway's use is intentionally "designed" to trade upon any alleged good will or reputation associated with your clients' brands.

Your invocation of the "initial interest confusion" doctrine fares no better. The logos are among the smallest elements in each advertisement and serve only to identify the companies that comprise "Big Cookware." Despite your protestations, Caraway's use of your clients' marks to identify your clients' own brands constitutes nominative fair use, particularly in the unmistakable context of criticism of your clients' products, which dispels any possible confusion as to an association between Caraway and your clients or their products.

In fact, Caraway's use of your clients' marks constitutes permissible comparative advertising, as the Second Circuit has long recognized. Your Letter's attempt to distinguish Caraway's use from fair use actually confirms it: Caraway uses your clients' marks to identify your clients and compare them unfavorably to Caraway. That is textbook fair use.

Equally baseless is your clients' dilution claim under Section 1125(c). As a threshold matter, your Letter fails to establish that any of your clients' marks have achieved the level of fame required to sustain a dilution claim—a showing of near-universal public recognition that your clients simply cannot make. Even if your clients could clear that threshold—which they cannot—Caraway's use of the marks for purposes of criticism or for advertising purposes to compare the parties' goods or services are expressly excluded from actionable dilution by blurring or tarnishment pursuant to the plain language of 15 U.S.C. ¶ 1125(C)(3)(A)

Accordingly, Caraway rejects your clients' demands in full and reserves all rights.

Sincerely,

Michael C. Lynch