



Copyright Review Board
United States Copyright Office · 101 Independence Avenue SE · Washington, DC 20559-6000

June 29, 2021

Matthew D. Asbell
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1040 Avenue of the Americas
New York, NY 10018

Re: Second Request for Reconsideration for Refusal to Register Bague Ruban, Manchettes Cannage, and Manchettes Tresse (Correspondence IDs 1-3MJ8ZMM, 1-3MJHD3S, 1-3MJ8G1WA; SR # 1-6990592562, 1-6990592702, 1-6990592802)

Dear Mr. Asbell:

The Review Board of the United States Copyright Office (“Board”) has considered Altesse’s second request for reconsideration of the Registration Program’s refusal to register a jewelry design claim in the works titled “Bague Ruban,” “Manchettes Cannage,” and “Manchettes Tresse” (“Works”). After reviewing the applications, deposit copies, and relevant correspondence, along with the arguments in the second requests for reconsideration, the Board affirms the Registration Program’s denials of registration.

I. DESCRIPTION OF THE WORKS

The Works are three jewelry designs. Bague Ruban is a ring consisting of a broken circle with a repeating parallelogram pattern across the ring. Manchettes Cannage is a bracelet employing a repeating pattern of diamonds and triangles along the bracelet. Manchettes Tresse is a bracelet with a repeating trapezoid pattern shape across the bracelet.

Altesse submitted multiple deposit images for each of the jewelry designs. The images submitted for Manchettes Cannage and Manchettes Tresse appear to depict multiple distinct bracelets of different widths.¹ Reproductions of the Works, including the inconsistent deposit images for Manchettes Cannage and Tresse, are included as Appendix A.

¹ On its website, Altesse offers a tool for customers to create their own bracelet, including ordering designs in different widths. See *Create Your Own Bracelet*, Les Georgettes by Altesse, https://www.lesgeorgettes.com/en-fr/create-your-own-bracelet-atelier_manchette_femme.html?s=70325701600000::702145899A4000 (customization page for bracelet with Manchettes Tresse design on 25 mm band) (last visited June 24, 2021). The Board expects the different bracelet sizes depicted in the deposits correspond with these sizing options.

II. ADMINISTRATIVE RECORD

On October 17, 2018, Altesse filed applications to register copyright claims in the Works. In January 19, 2019 letters, a Copyright Office registration specialist refused to register the claims, finding that the designs “will not support a claim to copyright.” Initial Letters Refusing Registration from U.S. Copyright Office to Matthew Asbell (Jan. 19, 2019).

In letters dated April 18 and April 19, 2019, Altesse requested that the Office reconsider its initial refusal to register the Works. Letter from Matthew D. Asbell to U.S. Copyright Office (Apr. 18, 2019) (regarding Bague Ruban); Letters from Matthew D. Asbell to U.S. Copyright Office (Apr. 19, 2019) (regarding Manchettes Cannage and Manchettes Tresse) (together with the Apr. 18 letter, the “First Requests”). After reviewing the Works in light of the points raised in the First Requests, the Office re-evaluated the claims and again concluded that the Works lacked a sufficient amount of creative authorship. The Office concluded that Bague Ruban consisted only of the “common and familiar shapes” of “circle, trapezoids, and triangles” combined in a common arrangement. Refusal of First Request for Reconsideration from U.S. Copyright Office, to Matthew Asbell at 2–3 (July 18, 2019). The Office also concluded that Manchettes Cannage consisted of “circle, triangles, and diamonds” combined in a “common arrangement” and that Manchettes Tresse employed a common arrangement of a “circle and polygons.” Refusal of First Request for Reconsideration from U.S. Copyright Office, to Matthew Asbell at 2–3 (July 18, 2019); Refusal of First Request for Reconsideration from U.S. Copyright Office, to Matthew Asbell at 2–3 (July 18, 2019).

In three letters dated October 18, 2019, Altesse requested that, pursuant to 37 C.F.R. § 202.5(c), the Office reconsider for a second time its refusal to register the Works. Altesse argued that Bague Ruban contained sufficient creativity because it employed “approximations” of common shapes that “differ in a number of respects” from their standard form, including having a “rounded appearance at the perceived corners” and having an “arch-like appearance” because the two-dimensional shapes “conform to the shape of the ring.” Letter from Matthew D. Asbell, to U.S. Copyright Office at 5–6 (Oct. 18, 2019) (also arguing that the elements were creatively combined because there were a “vast amount of different ways these shapes can be formed and presented) (“Bague Ruban Second Request”). With respect to Manchettes Cannage, Altesse argued that the design “consists of unique latticework that has been crafted and shaped into a rounded band,” with the latticework having “the appearance on the outside of the cuff as a string or a rope,” comprising a “twisted appearance” that is “an ornamental and expressive design.” Letter from Matthew D. Asbell, to U.S. Copyright Office at 2, 5 (Oct. 18, 2019) (“Manchettes Cannage Second Request”). Finally Altesse argued that Manchettes Tresse also employs “unique latticework” consisting of “interwoven somewhat curved strands” employing unique angles, lengths, and shapes. Letter from Matthew D. Asbell, to U.S. Copyright Office at 2, 4 (Oct. 18, 2019) (“Manchettes Tresse Second Request”).

III. DISCUSSION

A. *The Legal Framework*

1) *Useful Articles and Separability*

Copyright does not protect useful articles as such, which are defined in the Copyright Act as “article[s] having an intrinsic utilitarian function that is not merely to portray the appearance of the article or to convey information.” 17 U.S.C. § 101. Importantly, however, artistic features applied on or incorporated into a useful article may be eligible for copyright protection if they constitute pictorial, graphic, or sculptural works under sections 101 and 102(a)(5) of the Copyright Act. This protection is limited to the “‘pictorial, graphic, or sculptural features’ [that] ‘can be identified separately from, and are capable of existing independently of, the utilitarian aspects of the article.’” *Star Athletica, LLC v. Varsity Brands, Inc.*, 137 S. Ct. 1002, 1007 (2017) (quoting 17 U.S.C. § 101).

To assess whether an artistic feature incorporated into the design of a useful article is protected by copyright, the Office examines whether the feature “(1) can be perceived as a two- or three-dimensional work of art separate from the useful article and (2) would qualify as a protectable pictorial, graphic, or sculptural work—either on its own or fixed in some other tangible medium of expression—if it were imagined separately from the useful article into which it is incorporated.” *Id.* at 1007; *see also* COMPENDIUM OF U.S. COPYRIGHT OFFICE PRACTICES § 924 (3d ed. 2021) (“COMPENDIUM (THIRD)”). This analysis focuses on “the extracted feature and not on any aspects of the useful article that remain after the imaginary extraction [because the] statute does not require the decisionmaker to imagine a fully functioning useful article without the artistic feature.” *Star Athletica*, 137 S. Ct. at 1013. Put another way, while useful articles as such are not copyrightable, if an artistic feature “would have been copyrightable as a standalone pictorial, graphic, or sculptural work, it is copyrightable if created first as part of a useful article.” *Star Athletica*, 137 S. Ct. at 1011; 17 U.S.C. § 113(a) (“[T]he exclusive right to reproduce a copyrighted pictorial, graphic, or sculptural work in copies under section 106 includes the right to reproduce the work in or on any kind of article, whether useful or otherwise.”); *see also Esquire, Inc. v. Ringer*, 591 F.2d 796, 800 (D.C. Cir. 1978) (holding that copyright protection is not available for the “overall shape or configuration of a utilitarian article, no matter how aesthetically pleasing that shape . . . may be”).

2) *Works of Artistic Craftsmanship*

Copyright protects works of artistic craftsmanship as pictorial, graphic, or sculptural works “insofar as their form but not their mechanical or utilitarian aspects are concerned.” 17 U.S.C. § 101; *see* 37 C.F.R. § 202.10(a). A work of artistic craftsmanship is a decorative or ornamental object that can be considered a “work of art,” even though it “might also serve a useful purpose.” *See Star Athletica*, 137 S. Ct. at 1011 (interpreting U.S. Copyright Office regulation 37 C.F.R. § 202.8(a) (1948) governing “works of artistic craftsmanship”); *Mazer v. Stein*, 347 U.S. 201, 212, 213–14 (1954) (same).

The definition for a work of artistic craftsmanship is the mirror image of the definition for a useful article. Where a useful article is intrinsically utilitarian, a work of artistic

craftsmanship is intrinsically aesthetic. *See United States v. Perry*, 146 U.S. 71, 75 (1892) (distinguishing between “objects primarily designed for a useful purpose” and works of art “which serve primarily an ornamental, and incidentally useful, purpose”). In determining whether a work is a work of artistic craftsmanship, the Office considers the overall appearance of the item, including the form, shape, and configuration of the object as a whole. COMPENDIUM (THIRD) § 925.1. The Office does not consider subjective factors, such as the author’s intent, skill, experience, or reputation, or the marketability of the object. *See, e.g., Star Athletica*, 137 S. Ct. at 1015; 37 C.F.R. § 202.10(a); H.R. REP. NO. 94-1476, at 54 (1976), reprinted in 1976 U.S.C.C.A.N. at 5667.

When examining works of artistic craftsmanship for copyrightable authorship, the Office looks at the work as a whole for copyright protection and determines what mechanical or utilitarian aspects must be excluded from the claim. COMPENDIUM (THIRD) §925.23.

3) *Originality*

A work may be registered if it qualifies as an “original work[] of authorship fixed in any tangible medium of expression.” 17 U.S.C. § 102(a). In this context, the term “original” consists of two components: independent creation and sufficient creativity. *See Feist Publ’ns, Inc. v. Rural Tel. Serv. Co.*, 499 U.S. 340, 345 (1991). First, the work must have been independently created by the author, *i.e.*, not copied from another work. *Id.* Second, the work must possess sufficient creativity. *Id.* Only a modicum of creativity is necessary, but the Supreme Court has ruled that some works (such as the alphabetized telephone directory at issue in *Feist*) fail to meet even this low threshold. *Id.* The Court observed that “[a]s a constitutional matter, copyright protects only those constituent elements of a work that possess more than a *de minimis* quantum of creativity.” *Id.* at 363. It further found that there can be no copyright in a work in which “the creative spark is utterly lacking or so trivial as to be virtually nonexistent.” *Id.* at 359.

The Office’s regulations implement the longstanding requirement of originality set forth in the Copyright Act. *See, e.g.,* 37 C.F.R. § 202.1(a) (prohibiting registration of “[w]ords and short phrases such as names, titles, slogans; familiar symbols or designs; [and] mere variations of typographic ornamentation, lettering, or coloring”); *id.* § 202.10(a) (stating “to be acceptable as a pictorial, graphic, or sculptural work, the work must embody some creative authorship in its delineation or form”). Some combinations of common or standard design elements may contain sufficient creativity with respect to how they are juxtaposed or arranged to support a copyright. Nevertheless, not every combination or arrangement will be sufficient to meet this test. *See Feist*, 499 U.S. at 358 (finding the Copyright Act “implies that some ‘ways’ [of selecting, coordinating, or arranging uncopyrightable material] will trigger copyright, but that others will not”). A determination of copyrightability in the combination of standard design elements depends on whether the selection, coordination, or arrangement is done in such a way as to result in copyrightable authorship. *Id.*; *see also Atari Games Corp. v. Oman*, 888 F.2d 878 (D.C. Cir. 1989).

A mere simplistic arrangement of non-protectable elements does not demonstrate the level of creativity necessary to warrant protection. For example, the United States District Court for the Southern District of New York upheld the Copyright Office’s refusal to register simple

designs consisting of two linked letter “C” shapes “facing each other in a mirrored relationship” and two unlinked letter “C” shapes “in a mirrored relationship and positioned perpendicular to the linked elements.” *Coach, Inc. v. Peters*, 386 F. Supp. 2d 495, 496 (S.D.N.Y. 2005).

Likewise, the Ninth Circuit has held that stereotypical elements in a glass sculpture of a jellyfish including clear glass, an oblong shroud, bright colors, vertical orientation, and the jellyfish form did not merit copyright protection. *See Satava v. Lowry*, 323 F.3d 805, 811 (9th Cir. 2003). The language in *Satava* is particularly instructive:

It is true, of course, that a *combination* of unprotectable elements may qualify for copyright protection. But it is not true that *any* combination of unprotectable elements automatically qualifies for copyright protection. Our case law suggests, and we hold today, that a combination of unprotectable elements is eligible for copyright protection only if those elements are numerous enough and their selection and arrangement original enough that their combination constitutes an original work of authorship.

Id. (internal citations omitted).

Similarly, while the Office may register a work that consists merely of geometric shapes, for such a work to be registrable, the “author’s use of those shapes [must] result[] in a work that, as a whole, is sufficiently creative.” U.S. COPYRIGHT OFFICE, COMPENDIUM OF U.S. COPYRIGHT OFFICE PRACTICES § 906.1 (3d ed. 2021) (“COMPENDIUM (THIRD)”); *see also Atari Games Corp.*, 888 F.2d at 883 (“[S]imple shapes, when selected or combined in a distinctive manner indicating some ingenuity, have been accorded copyright protection both by the Register and in court.”). Thus, the Office would register, for example, a wrapping paper design that consists of circles, triangles, and stars arranged in an unusual pattern with each element portrayed in a different color, but would not register a picture consisting merely of a purple background and evenly spaced white circles. COMPENDIUM (THIRD) § 906.1.

Finally, Copyright Office registration specialists (and the Board) do not make aesthetic judgments in evaluating the copyrightability of particular works. *See* COMPENDIUM (THIRD) § 310.2. The attractiveness of a design, the espoused intentions of the author, the design’s visual effect or its symbolism, the time and effort it took to create, or the design’s commercial success in the marketplace are not factors in determining whether a design is copyrightable. *See, e.g., Bleistein v. Donaldson Lithographing Co.*, 188 U.S. 239 (1903).

B. Analysis of the Works

After carefully examining the Works and applying the legal standards discussed above, the Board finds that the Works do not contain the requisite authorship necessary to sustain a claim to copyright.

1) Bague Ruban

The Bague Ruban ring consists entirely of common shapes. The main design elements of the ring are its near-circle shape, three rounded parallelograms spanning the body of the ring, and two rounded triangles on either end of the ring. The two triangles at the ends of the ring appear similar to the corners of the parallelograms, as if the parallelogram was cut off partway. *See*

Bague Ruban Second Request at 8 (showing shapes alongside each other). The Office cannot issue a copyright registration based solely on “familiar symbols or designs.” *See* 37 C.F.R. § 202.1(a); COMPENDIUM (THIRD) § 906.1 (common geometric shapes, including curved lines and circles, are not protectable); *see also Coach*, 386 F. Supp. 2d at 498 (finding Office application of these rules to deny registration to pattern of linked and unlinked “C” symbols was not arbitrary or capricious).

Altesse argues the Bague Ruban ring does not use common geometric shapes but instead employs “incidental approximations of these basic shapes” with an “arch-like appearance” because of their application to a curved, three-dimensional ring. Bague Ruban Second Request at 5. But these arguments do not change the Office’s conclusion: the “quasi-cylinder” depth of the shapes is due to their application to a three-dimensional ring, and the rounded corners and slight curvature at most are unprotectable “mere variations on a familiar symbol or design.” COMPENDIUM (THIRD) § 906.2.

Nor is the combination of these shapes more than a garden-variety arrangement. As Altesse’s Second Request shows, the shapes are arranged in a single row as negative space spanning the ring. *See* Bague Ruban Second Request at 8 (depicting shapes in a row and conceding their arrangement is “aligned along a curve”—the ring). Altesse claims it has employed a sufficiently creative selection and arrangement by selecting three trapezoids “bookended by two allegedly triangular forms” because “one does not commonly find this specific arrangement in nature or other creative works.” Bague Ruban Second Request at 8. But the ring design as a whole does not bear this argument out. Choosing two similar geometric shapes for inclusion on a ring does not result in a work that is sufficiently creative as a whole. *See* COMPENDIUM (THIRD) § 906.1 (giving example of picture with purple background and evenly spaced circles). And placing shapes in a single row, albeit one curved due to the curvature of a ring, is not a sufficiently creative arrangement to support registration.

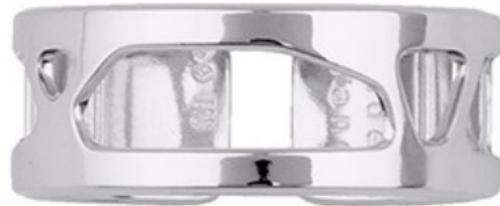
Altesse’s additional arguments in support of the copyrightability are not persuasive. Altesse argues that the geometric shapes are not common or familiar “when compared to traditional circles, trapezoids, and triangles and when viewed in three-dimensional reality.” Bague Ruban Second Request at 9. As explained above, however, because “mere variations” of common shapes are unprotectable, slight rounding or minor curvature does not supply the necessary authorship required for copyright protection. Jewelry is generally three-dimensional, and jewelry that employs common shapes in three-dimensions cannot support a copyright claim. *See* COMPENDIUM (THIRD) §§ 908 (most jewelry designs are protected as sculptural works), 908.2 (examples of unprotectable designs include three-dimensional broach “consisting of three parallel rows of sapphires”).

Finally, Altesse argues it has “obtained copyrights for similar designs” and that its prior registrations affect the analysis here. The Office, however, makes registration decisions on a case-by-case basis and prior registration decisions “ha[ve] no precedential value and [are] not binding upon the Office” when it reviews new applications. COMPENDIUM (THIRD) § 309.3. Moreover, the cited registration for Bague Girafe, VA0002157371, reinforces the Office’s conclusion in this instance. The Office initially refused registration for Bague Girafe as consisting of unprotectable shapes. Altesse successfully argued in its request for reconsideration that the design was protectable because it employed “five geometric shapes, namely and oval,

two trapezoids, and two diamond-shapes of varied sizes,” in a creative way that “evokes the elegant and interlocking geometric patterns on a giraffe’s fur.” Letter from Matthew D. Asbell, to U.S. Copyright Office at 2, 3 (Apr. 18, 2019). Looking at the two designs side-by-side, Bague Ruban employs fewer, and more common, shapes in a less creative way than the Bague Girafe design.²



Bague Ruban



Bague Girafe, VA0002157371

2) *Manchettes Cannage*

The Manchettes Cannage bracelet design, like Bague Ruban, largely employs common geometric shapes as its main design elements. The bracelet itself is shaped in a broken circle,³ and the band is made up of a repeating series of diamonds and triangles. These are common shapes that cannot support registration. See 37 C.F.R. § 202.1(a); COMPENDIUM (THIRD) § 906.1. In addition to the base diamond and triangle shapes in the design, applied to the three-dimensional bracelet, Manchettes Cannage also includes small design elements at the intersection of lines in the middle of the bracelet, which Altesse describes as “string of rope-like bands of metal [that] intersect and appear from the outside of the cuff to twist around each other,” which is “merely an ornamental and expressive design element.” Manchettes Cannage Second Request at 5; see also *id.* at 7 (describing design as “meant to evoke cane weavings”).

Considering these design elements, as well as the design as a whole, the Board concludes that they fall short of the necessary creative authorship to support a registration. While the

² Altesse also argues that its use of the “●G●” logo or the embossed “Made in France” text inside the ring could support registration. But those elements are part of the Bague Girafe registration, and previously registered material cannot be the basis for a new copyright registration. See COMPENDIUM (THIRD) §§ 503/5(B) (previously registered material is unclaimable in new applications), 602.4(E) (stating that the Office will not “will not knowingly issue multiple registrations for the same claim, because this would confuse the public record”); *contra* Bague Ruban Second Request at 8–9.

³ Altesse disputes the Office’s characterization of the bracelet shape as a circle, arguing instead that the bracelet is “slightly oblong.” Manchettes Cannage Second Request at 4. Because Altesse provided three deposit images that do not clearly depict the bracelet from a side view showing whether the shape is oblong, the Board cannot consider that as a basis for registration. See COMPENDIUM (THIRD) § 504 (scope of copyright registration generally limited to authorship “contained in the deposit copy(ies)”); see also COMPENDIUM (THIRD) § 908.3 (advising applicants for jewelry designs to “include all of the copyrightable elements” in their deposits because “the registration specialist can examine only the designs that are actually depicted in the identifying material”).

Manchettes Cannage design is closer to the line of copyrightability than Bague Ruban, the Board concludes that the elements depicting intersecting ropes are an insufficiently creative variation on a familiar symbol or design. *See* COMPENDIUM (THIRD) § 906.2 (“the copyright law does not protect mere variations on a familiar symbol or design, either in two-or three-dimensional form”); COMPENDIUM (THIRD) § 313.4(J) (“standard industry designs” cannot be basis for copyright claim). Cannage designs are a common motif within the fashion industry, originating in 18th century furniture.⁴ While some expressions of cannage designs are sufficiently creative to support copyright claims, the Board concludes that the simplified expression in the Manchettes Cannage design, alongside the bracelet’s other design elements, is no more than a “mere variation” of this common and aged industry design.⁵

As noted above, Altesse submitted three deposit images for Manchettes Cannage, two of which appear to be from a 25-millimeter band and one from a 14-millimeter band.⁶ Because the jewelry bands in different sizes are different physical objects, they are separate works and generally must be submitted in separate applications. *See* COMPENDIUM (THIRD) § 511 (“the Office generally allows only one work per application”); 17 U.S.C. § 101 (“where [a] work has been prepared in different versions, each version constitutes a separate work”). But the Board has reviewed the designs depicted in the deposit images and determined that each lacks sufficient copyrightable authorship, for the reasons explained above. Because the different images suffer from the same issue, the Board will affirm refusal of registration without additional consideration of how to handle their inconsistency.

Altesse invites the Board to look at its prior registration for Manchettes Poisson, VA0002157382, as a point of comparison justifying registration of Manchettes Cannage. Manchettes Cannage Second Request at 6–7. Because previous registrations have no precedential value in the case-by-case decisions on copyright registration, the Board declines to do so here.

3) *Manchettes Tresse*

The Manchettes Tresse design employs a single repeating geometric shape across the span of the bracelet. The repeating shape is an obtuse trapezoid that is slightly deformed by the curvature of the bracelet and slight curvature of its lines. Applicant argues that the repeating

⁴ *See* Colby Mugarbi, *Dior Cannage*, Minnie Muse (June 26, 2018), <https://www.minniemuse.com/articles/musings/dior-cannage> (describing cannage as originating in “an old fashion technique of weaving on a frame using rattan cane” and subsequent usage by Christian Dior in fashion designs); Esquire staff writer, *Dior brings back Cannage design men’s bags with its new Summer line*, Esquire Middle East (Mar. 25, 2019), <https://www.esquireme.com/content/33256-dior-brings-back-cannage-design-mens-bags-with-its-new-summer-line> (“The Cannage pattern has been inspired by Napoleon III-style chairs that were originally used to seat guests at the Dior Haute Couture shows at 30 Avenue Montaigne.”).

⁵ As with Bague Ruban, placing common shapes on a single row spanning the width of the bracelet is not a sufficiently creative arrangement of unprotectable elements. *See* COMPENDIUM (THIRD) § 906.1.

⁶ *See Cannage bracelet 25 mm*, Les Georgettes by Altesse, https://www.lesgeorgettes.com/en-fr/vip-sale/cannage-bracelet-25-mm-silver-finish-fiche_produit_vg_bracelets_femme_argentee_cannage_25_mm_manchette.html (last visited June 24, 2021); *Cannage bracelet 14 mm*, Les Georgettes by Altesse, https://www.lesgeorgettes.com/en-fr/jewellery/bracelets/bracelets/cannage-bracelet-14-mm-gold-finish-fiche_produit_vg_bracelets_femme_doree_cannage_14_mm_manchette.html (last visited June 24, 2021).

trapezoid shape is “not at all common or familiar” and that the shape has an “arch-like appearance because the planes that allegedly appear as flat polygons are actually curved and bent to conform to the shape of the cuff.” Altesse additionally argues that the use of curved metal with “crisscrossing strands” provide additional creative authorship to support registration here.

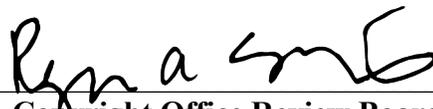
After considering the design as a whole, the Board concludes that Manchettes Tresse does not contain sufficient creative authorship to support registration. The design employs a single repeating shape, a deformed obtuse trapezoid, that amounts to a “mere variation” of a common geometric shape. Though the design includes additional variation in the use of metal strands that appear to overlap, the Board concludes that the design, viewed as a whole, falls short the necessary creative authorship required to support a copyright claim.

Again, the four deposit images for Manchettes Tresse appear to depict the bracelets in 8-millimeter, 14-millimeter, 25-millimeter, and 40-millimeter widths.⁷ As was the case for Manchettes Tresse, the Board has considered each design and concluded that each of them lacks copyright authorship for the reasons set out above. The Board thus does not address this inconsistency.

Altesse again invites the Board to look the prior registration for Manchettes Poisson as a point of comparison to support registration of Manchettes Tresse. As above, the Board declines to do so.

IV. CONCLUSION

For the reasons stated herein, the Review Board of the United States Copyright Office affirms the refusal to register the copyright claims in the Works. Pursuant to 37 C.F.R. § 202.5(g), this decision constitutes final agency action in this matter.



U.S. Copyright Office Review Board

Regan A. Smith, General Counsel and

Associate Register of Copyrights

Catherine Zaller Rowland, Associate Register of

Copyrights and Director, Public Information and

Education

Kimberley Isbell, Deputy Director of Policy and

International Affairs

⁷ See, e.g., *Tresse bracelet 40 mm*, Les Georgettes by Altesse, https://www.lesgeorgettes.com/en-fr/jewellery/bracelets/bracelets/tresse-bracelet-40-mm-silver-finish-fiche_produit_vg_bracelets_femme_argentee_tresse_40_mm_manchette.html (last visited June 24, 2021); *Tresse Bracelet 8 mm*, Les Georgettes by Altesse, https://www.lesgeorgettes.com/en-fr/jewellery/bracelets/bracelets/tresse-bracelet-8-mm-silver-finish-fiche_produit_vg_bracelets_femme_argentee_tresse_8_mm_manchette.html (last visited June 24, 2021).

Appendix A

Bague Ruban



Manchettes Cannage



Manchettes Tresse

