

Legal Dimensions towards the role of Artificial Intelligence and Trademark in Indian Corporate Sectors

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Received: 10-January -2023

Revised: 27-February -2023

Accepted: 29-March-2023

Abstract

Introduction: The Trademark Law constitutes as one of the pillars of the Intellectual Property Law as well as the retail industry. Over the years, the trademark law has not only promoted retail growth by promoting several creators to establish their brands efficiently but also assisted consumers in making smarter and informed buying decisions. As decided in the landmark case of *Amritdhara Pharmacy v. Satyadev Gupta*, reasonable man's tests and overall impression test of the mark was the key principle while deciding the deceptive marks. However, there is a paradigm shift in the retail industry from seller's choice, choosing brands from super market, and to rely on the Artificial Intelligence seems to directly impact the very basis of the Trademark Law i.e. human frailty. This can be attributed to the tendency for AI softwares to filter and predict the needs and wants of the 'human' consumer. The biggest example of this is the Amazon 'Alexa' an artificial intelligence programme meant to assist humans in their everyday menial tasks as well as providing assistance with regards to their shopping experience. The software carefully limits the consumer market into 3 options, which include one Amazon's choice, one industry leader and finally one based on consumers past purchases and preferences. However, there exists a drawback to this software, as these options overlook consumer emotions and gives more importance to the price and speed of delivery.

It must also be noted that many brands have been neutralising their logos to a more minimal approach taking away visual aesthetics of the brand and simply relying on their established brand image and concept, relying on their consumers to consciously make the choice to purchase from them. This seems to be in line with the decreased interaction of consumers and brands as AI acts as a middleman between them. Does this however, ensure genuine products? Contrary to popular assumption, artificial intelligence is likewise susceptible to manipulation based on the data that is put into its programming, making it a "second degree" infringer. AI is anticipated to make online infringement searches and the creation of take down notifications easier in terms of enforcement. Most of the firms questioned do not view AI as a danger, despite some worries about job security. Additional clauses can be included to address digital trademark infringement through meta-tags, perhaps forbidding junior users from using catchy and recognisable terms even in their meta-tags that control the consumer's search results. There is broad agreement and little doubt that over the next several years, AI will transform trademark prosecution and enforcement.

Objectives: The objective of this research paper is to find out the emergence of the AI and the paradigm shift towards the 'shopping model' where AI scrutinizes consumer behaviour by way of social media searches, past purchases, etc. The second objective is the impact of AI on the trademark law wherein the foundation of Trademark Law which depends on the concept of deceptive similarity and the average consumer confusion wherein they intend to use the same quality and services of the product.

Methods: In this paper we will discuss the current AI trends as it corresponds to the trademark law and retail industry as well as the core issue of the long term impact of AI on how consumers buy products and services and the knock-on impact on trademark law which has been overlooked and a bird's eye view on the paradigm shift of average consumer's choice which is the very essence of the trademark law to rely on the brands by Artificial Intelligence. This research paper aims to provide a background regarding intersection of artificial intelligence and trademark in the modern markets by firstly providing an inter-relation between AI and trademark in the e-commerce segment by citing the example of AI powered assistants. Another objective of this

research paper was also to study the Dichotomy between Trademark Law and Artificial Intelligence through the medium of analysing consumer behaviour in the market. Additional legal dimension has been given to this paper by citing the Trademarks Acts from various other countries and citing relevant national and international case laws related to the topic.

Results: It must also be noted that many brands have been neutralising their logos to a more minimal approach taking away visual aesthetics of the brand and simply relying on their established brand image and concept, relying on their consumers to consciously make the choice to purchase from them. This seems to be in line with the decreased interaction of consumers and brands as AI acts as a middleman between them. Does this however, ensure genuine products? Contrary to popular assumption, artificial intelligence is likewise susceptible to manipulation based on the data that is put into its programming, making it a "second degree" infringer. AI is anticipated to make online infringement searches and the creation of take down notifications easier in terms of enforcement. Most of the firms questioned do not view AI as a danger, despite some worries about job security. Additional clauses can be included to address digital trademark infringement through meta-tags, perhaps forbidding junior users from using catchy and recognisable terms even in their meta-tags that control the consumer's search results. There is broad agreement and little doubt that over the next several years, AI will transform trademark prosecution and enforcement.

Conclusions: There are several problems at the intersection of trademark and AI because of the change in customer behaviour. The marketing sector, especially e-commerce businesses, heavily relies on AI to sell products to clients, which highlights how important AI is for estimating brand value. Comparative advertising, in which an AI application promotes a brand other than the one the user is looking for to increase the provider's profit margins, is becoming more and more prevalent with the expansion of online purchasing. However, if the consumer experiences initial interest confusion, they can decide to change their ideas and pick the AI provider and competitor instead. It is obvious that the current IP laws need to be changed because they cannot adequately address these problems. Changes to the inclusion of digital trademark rights, such as in the situations of meta-tags and AdWords, may be required to address the current issues. To prevent digital trademark infringement using meta-tags, further restrictions can be added, potentially prohibiting junior users from using catchy and recognisable terms even in their meta-tags, which are what determine the consumer's search results.

Keywords: Intellectual Property Rights, Trademarks, Artificial Intelligence, Deceptive Similarity

1. Introduction

In the present age of technological advancement, man has finally achieved the advent of replicating human intelligence via machines. The European Council defined Artificial Intelligence (AI) as "A set of sciences, theories and techniques whose purpose is to reproduce by a machine the cognitive abilities of a human being." This artificial intelligence has been further classified under three parameters by the council ranging from 'strong' to 'weak' or 'moderate' based on the machines capability to contextualise independently irrespective of the area of specialisation as compared to the machines limited to a single area of specialisation.

However, the essence of any technology continues to remain the same, i.e. to assist their human masters and to make human life more comfortable. Accordingly, AI has adapted itself across various spheres of human life, ranging from voice assistants, image recognition, music and media streaming services, chatbots, virtual assistants, online shopping and e-commerce, banking, etc. The human reliance on AI is almost turning into a need rather than a luxury as we delegate more and more of our tasks to the machine.

Consequently, by overcoming the shortcomings of a human, AI diminishes the need for laws protecting man from his/her shortcomings and at the same time, creates a requirement for laws to ultimately protect humans from the shortcomings of an AI. A similar observation can be made in the case of Intellectual Property Laws particularly trademark laws. "A trademark is a sign capable of distinguishing the goods or services of one enterprise from those of other enterprises." Accordingly trademark law aimed to facilitate the average

consumer's ability to recollect and recognise a particular brand of goods and services and to protect original marks.

Trademark laws in the present can be traced back to the purchasing practices of the consumers during the 19th century, wherein the shop assistant acted as a filter between the consumer and the product, advising and guiding on the quality of the product which were mostly unbranded. This was soon replaced by modern supermarkets and delegated the decision making back in the hands of the consumers as they made purchases regarding the brand of the product to ensure themselves regarding the quality of the product. The brands hence came to the forefront, spending hefty amounts to stand out and market themselves, with catchy taglines, brighter colours and fancy logos etc. in a bid to attract consumers and create a market presence.

A decade later the modern super markets were once again replaced with e-commerce or online shopping creating a wider market and a wider range of products to choose from. As the consumer continued to make the purchasing decision, social media revolution introduced the concept of “influencers” which guided the consumers on the efficacy, quality of product and value for money of the products by acting as first-degree consumers and hence “verifying” the claims of the sellers for the consumers at large. Accordingly, trademark law was a means of protection for the “average” consumer from being deceived into buying lower-quality products that might look similar to their trusted brands and for the sellers to maintain and protect their identity and reputation against misuse by third persons passing off their goods deceptively as counterfeits.

The current claims surrounding AI deem technology to be a “perfect” consumer due to its ability to recall the source ‘perfectly’ hence avoiding any confusion among brands. However, whether this is true against any errors or other forms of manipulation is yet to be completely understood and therefore its overall effect on the trademark law also needs to be re-evaluated.

2. Objectives

This research paper aims to provide a background regarding intersection of artificial intelligence and trademark in the modern markets by firstly providing an inter-relation between AI and trademark in the e-commerce segment by citing the example of AI powered assistants. Another objective of this research paper was also to study the Dichotomy between Trademark Law and Artificial Intelligence through the medium of analysing consumer behaviour in the market. Additional legal dimension has been given to this paper by citing the Trademarks Acts from various other countries and citing relevant national and international case laws related to the topic.

3. Methods

A doctrinal or a non-empirical research methodology was used to write this research paper. Various sources like existing literature, journal articles, national and international case laws and judgements were referred and reviewed to write this research paper.

4. Results

Artificial Intelligence and E-Commerce

Artificial Intelligence (AI) across different applications and areas of function, require specific techniques and solutions. The most successful approach towards AI however, is neural network modelling and machine learning. A neural network can be easily understood as a series of simple, connected processors which are referred to as neurons, each of them producing a sequence of real valued activations.

The artificial intelligence neural network Modelling and deep learning techniques have created a variety of intelligent applications for advanced feature extraction. In the field of image recognition, conventional neural networks (CNN) have greatly contributed towards increase in the accuracy of image recognition and therefore often outperform humans. Another technique which is known as the Siamese neural network (SNN) is also often combined with CNN to explore product similarity using image embedding. In this sense it presents itself

as the perfect consumer with perfect recollection and the ability to accurately compare differences by analysing the finer details of the various trademarks stored in its data bank.

Accordingly, the use of AI has only increased in both the private sector but also in the government sector by greatly reducing the search costs of trademarks and assisting with its registration, identification and administration and consequently paved-way for a private AI powered market to optimise trademark search and registration.

However AI is not only affecting the way trademarks are searched or regulated but it also affects the relationship between the consumer and the brand or the trademark.

As the younger generation truffles online purchasing due to the convenience and the range of variety, online stores have found their inception with the Amazon website being one of the most successful and renowned online supermarkets. The website uses a combination of artificial intelligence services as it suggests or recommends the products to the consumers based on their browsing history as well as their purchases history acting as a modern shop assistant from the 19th century. The artificial intelligence systems analyse the website data which is based on certain pre-decided criteria and therefore through its algorithm suggests products to the consumers.

Besides their website the Amazon Company also provides a virtual assistant in the form of Amazon's Alexa, an artificial intelligence product which depends on voice recognition software programs similar to Apple's Siri, Watson and various other Google Home devices. These devices can interact, entertain, carry out general tasks and even order products for purchase based on consumer's data, market trends and brand information.

It must also be noted that almost all of the online shopping websites nowadays use some form of artificial intelligence in the form of Bots. These are very critical in the consumer experience online as they allow the consumer to filter out his preferences based on price, location, style, brand etc. The most common examples of which are eBay shop bots or Mona.

It is also observed that more than often AI suggests products based on price and speed of delivery and therefore lacks any contextual, emotional or any symbolic relation to brands which a normal consumer might hold when making a purchasing decision. As a result it has been causing a lot of damage to brands with regards marketplace presence, consumer loyalty and repeat purchases.

Furthermore, no market-place be it physical or online is safe from counterfeiting or counterfeit products. As online counterfeiting increased gradually, many manufacturers pulled out from online platforms such as Amazon in order to prevent further harm to reputation and opted for their own online selling portals. As a result, several reputable intermediaries have chosen to implement complaint systems that allow legitimate merchants or buyers to submit issues or concerns with the Marketplace administrators involving fake goods or illegal copyright content. Project Zero, Amazon's proprietary anti-infringement technology, is built on three elements: the need for product serialisation, a self-service counterfeit removal service, and an automated protection mechanism. VeRO is a counterfeit prevention software offered by eBay. The intellectual property system used by Alibaba and Taobao was formerly known as AliProtect.

Alibaba's AI-powered intellectual property protection system is another such. In order to detect unusual merchant behaviour, the system employs "product intelligence, picture and semantic recognition algorithms, real-time surveillance and interception, bio-identification, and algorithms."

However since AI mostly works on collecting and analysing data which has either been fed into it via machine learning or stored in its neural networks, questions regarding reliability on AI take form in the consumer's mind. While many online marketplaces have installed softwares or artificial intelligence powered technology to provide protection against counterfeit goods for both the sellers as well as the consumers, the same can only be identified after a complaint or issue has been raised. In this case if the artificial intelligence recommends or

suggests the purchase to the consumer which turns out to be a counterfeit, Will AI be termed as an infringer in the secondary degree?

In 2019 a research study, dealing with AI and its use in counterfeiting, 'identified specific cases where in artificial intelligence applications had registered domain names which have recently lapsed and have high traffic automatically. Online shops were automatically set up to sell counterfeit products by those domains.'

The working model of the AI technology also creates a competition among brands in a bid to control how artificial intelligence interacts with their brands. A prime example of the same is the case of Lush versus Amazon. The court held a trademark infringement by Amazon upon the 'Lush' trademarks. It was found that Amazon bought the keyword 'lush' from the Google bidding process the effect of which directly affected the discoverability of the 'Lush' brand on Google search engine, as it redirected the consumer to the Amazon website based on the keyword. It was also found that when the keyword was entered into the amazon's website the AI system suggested similar products rather than the branded original Lush product. Even though there were no sales records of lush products on the Amazon website, the AI product system suggesting similar products based on the keyword was held to be a clear case of infringement.

Currently there is also a great requirement to cater to the increasing use of AI assistants which function via voice recognition systems. This means it directly relies on a consumer's pronunciation of the brand and the virtual assistants' interpretation of the same. The implications of which are discussed below.

A Dichotomy between Trademark Law and Artificial Intelligence:

Trademark law has been the essence behind the current market scenarios, by changing the way brands and consumers interact with each other. Accordingly it has allowed the development and growth of market concepts such as discoverability, brand loyalty, after sales services, brand reputation etc. and therefore allowed an emotional bond to be created between the purchaser and the seller. It plays a very important role in protecting brands and Consumers against any kind of deceptive trade practices or counterfeit products. It allows for an ever changing mode of intellectual property protection by providing a scope for adoption of both traditional and non-traditional trademarks as well as appropriate redressal and remedial forum.

The social media revolution and the increasing use of artificial intelligence in our day to day life creates a virtual barrier between brand and consumers. The consumers now rely on third party verifications and suggestions regarding the quality and usage of a product, when making the purchasing decision.

Legal researchers are under the pretext that artificial intelligence will gradually replace Trademark law as it directly affects the basic tenets on which Trademark law is founded by overcoming the shortcomings of an "average" consumer.

The term average consumer is very important in the trademark law, as it considers a human's ability to recall, recollect, remember, compare, analyse and comprehend while making a purchasing decision, leaving ample scope for error and confusion.

Some of the most important rules and fundamentals of trademark law include doctrine of likelihood of confusion, doctrine of initial interest confusion, post purchase confusion, average consumer or average internet consumer, imperfect recollection, as well as visual, phonetic and conceptual similarity.

An average consumer while making a purchasing decision goes through various levels of comprehension and confusion with regards to the source of the product. 'This confusion can be of various types i.e.

- Source confusion, wherein there exist too many similar marks in the market
- Likelihood of confusion, wherein there is no actual confusion but merely a likelihood of the same
- Sponsorship confusion, wherein consumers believe the original owner is behind the the purchased goods when the same is not the case

- Initial interest confusion, wherein there exists a temporary pre-purchase confusion regarding a different similar product and this confusion gets dispelled after purchase
- Post Purchase Confusion, wherein original trademarks are wrongfully applied on non-genuine products hence diminishing the value of the brand and can be easily understood as counterfeit products.'

Often courts rely on the average consumer doctrine in order to establish trademark infringements due to the direct interaction between the product and the consumer when making a purchasing decision or in case of an online shop, the information that an average consumer possesses about the product and/or brand as was established in the case of Google France which is based on the 'imperfect recollection' of a human consumer.

Finally, a consumer's comprehension relies on the visual, phonetic and the concept behind the way a brand is marketed and plays a very important role in determining the consumer's choice.

The basis of Trademark Law – Passing-Off and Infringement of a Trademark.

1. Doctrine of Likelihood of Confusion:

Consumer bewilderment is a hallmark of a trademark infringement claim. If a person uses a mark in the course of their business in a way that is likely to confuse customers, that is considered trademark infringement. The "likely of confusion" between the mark in the application and a mark that has already been registered or a pending application with an earlier filing date owned by another party is one of the most frequent grounds for refusing registration. In Smith Hayden's Application, the criteria for determining the possibility of confusion or deceit was outlined using the traditional Evershed formula.

"Assuming user by the opponent of his registered trade mark in a normal and fair manner for any of the goods covered by the registration of the mark (not including particularly goods also covered by the proposed registration of the mark) is the court satisfied that there will be no reasonable likelihood of deception or confusion amongst a substantial number of persons if the applicant also uses his mark applied for normally and fairly in respect of any goods covered by their proposed registration."

Section 11(1) of the Trademarks Act, 1999 uses the expression "there exists a likelihood of confusion on the part of public, which includes the likelihood of association with the earlier trademark." Article 49(1)(b) of the EEC Directives also uses identical expression. So does Section 5(1) of the UK Trade Marks Act, 1994.

Further to identify that there is likelihood of confusion between two marks, we quote Parker, J. in PianotistCo's Application:

"You must take the two words. You must judge of them, both by their look and by their sound. You must consider the goods to which they are to be applied. You must consider the nature and kind of consumer who would be likely to buy the goods."

2. Initial Interest Confusion:

The initial interest confusion problem has only recently emerged as a result of the evolution of contemporary sales methods, but it was first identified through the judicial interpretation offered by various courts throughout the world. When an initial interest is sparked by the illegal use of a product's name, trademark, or goodwill, it is regarded as trademark infringement, as has been held in several cases around the world. However, when an initial interest is sparked by the product's own attributes and goodwill itself.

The initial interest confusion is related to the uncertainty prior to purchase; it shouldn't be confused with the uncertainty during buying. It involves the time when a person has decided that he needs something but has not yet arrived at the location from which he must purchase that product, so the initial interest confusion is absent. It also involves the time when the person has arrived at the location from which he must purchase that product and has become confused because he has seen two marks that are similar to each other, especially when making an online purchase, but its origin is unknown.

In case of *Consim Info Pvt. Ltd Vs. Google India Pvt. Ltd. and Ors.*, while discussing various cases the court observed in regards to the initial interest theory that *"in the early stages, courts perceived the unauthorised use in metatags, by a person, of someone else's trademark, as creating confusion in the minds of the consumers. This doctrine, identified as a doctrine of initial interest confusion posits that trademark infringement results when a consumer has been confused prior to purchase. But in normal circumstances, the likelihood of confusion would occur at the time of purchase. All over the world, the Courts have struggled hard, as pointed out above, to grapple with this problem of "initial interest confusion" in the internet context, where internet users seeking a trademark owner's website are diverted (i) either by identical or confusingly similar domain names to websites in competition with the trademark owner or (i) by a competitor's unauthorised use of another's mark as the keyword to generate banner or pop-up advertisements for its products and services."*

The use of others trademark as a metatags in drawing the consumers towards its own website is a common case these days.

As stated in New York Journal published on September, 2021, "initial-interest confusion may arise when a potential purchaser mistakenly visits a competitor's website due to the competitor's use of a domain name or phrase similar to a trademarked domain or phrase, and, after learning that there is no connection between the competitor and trademark holder, nonetheless purchases the competitor's product. Initial interest confusion recognises that a senior user's goodwill holds value at all times, not merely at the moment of purchase. The theory protects against the treat of a competitor 'receiving a free ride on the goodwill of an established mark."

In *Brookfield Communications, Inc. v. West Coast Entertainment Corp.*, it was held that *"Using another's trademark in one's meta-tags is much like posting a sign with another's trademark in front of one's store..... Customers are not confused in the narrow sense: they are fully aware that they are purchasing from Blockbuster and they have no reason to believe that Blockbuster is related to, or in any way sponsored by West Coast. Nevertheless, the fact that there is only initial consumer confusion does not alter the fact that Blockbuster would be misappropriating West Coast's acquired goodwill."*

In order to assert trademark infringement, section 29(1) of the Trade Marks Act, 1999 stipulates that there must be a probability of confusion caused by the trademark's likeness. When there is initial interest confusion, it refers to the uncertainty that exists before a person makes a purchase and realises that he is not making the same purchase that he had anticipated, but he has also come to like the product as a result of the initial interest that was initially created for whatever reason. The most popular method of doing the same is to use another party's trademark as a meta tag, and doing so has been viewed as an infringement by several courts in the judgements noted above.

3. Average Consumer and imperfect Recollection

In the landmark case of Hon'ble Supreme Court in *Amritdhara Pharmacy v. Satya Dev Gupta*, the Supreme Court clarified that *"the likelihood of confusion must be judged from the eyes of an unwary consumer with average intelligence and imperfect recollection. It is important to recognise that consumers do remember each and every element of a trademark and do not determine the etymological meaning of marks at the time of purchasing goods or availing services. Thus, even if a critical comparison of the two names may disclose some points of difference, but an unwary purchaser of average intelligence and imperfect recollection may still be deceived by the overall similarity of the two names since an unwary consumer is merely has a somewhat vague recollection that he had purchased similar goods on a previous occasion with a similar name."*

The average consumer normally perceives a mark as a whole and does not proceed to analyse its various details. The similarity and likeness of deception between the marks have to be gauged by analysing the marks in totality. The Anti-dissection rule draws from Section 17 of the Trade Marks Act, 1999. Section 17(1) of the mark states that in case of a mark consisting of several matters, the proprietor of the mark holds exclusive rights over the trademark as a whole.

4. Phonetic and visual Similarity of Marks:

Section 29(9) of the Trade Marks Act, 1999, which specifies that a mark may be violated by the spoken usage as well as visual depiction of words, incorporates the clause dealing with infringement of a registered mark as a result of phonetic similarity. The Supreme Court has often held that when comparing trademarks, the ear and the eye must both be taken into consideration.

In the landmark case of Cadila Healthcare Ltd. v. Cadila Pharmaceuticals Ltd., where the Supreme Court stated that "it was not correct in law to hold that the principle of phonetic similarity cannot be used when the manner in which the conflicting words are written is different, phonetic similarity was established as one of the fundamental tests of comparison." In *Consitex SA v. Kamini Jain and Ors.*, the Delhi High Court was charged with making a ruling about two similarly sounding marks, "Zegna," an Italian luxury fashion company (pronounced Zen-Yah), and "Jenya." In this case, the court sided with the plaintiff and determined that Jenya was a confusingly similar trademark. Given how different the two marks are from one another, the Court might not have ruled in Zegna's favour if they had not presented evidence supporting the pronunciation of Zegna as "Zen-Yah."

The decision in *Consitex SA* was then referred to in the case of *Imagine Marketing Pvt. Ltd. v. Exotic Mile*. The court, *inter alia*, held the mark Boulton to be phonetically similar to Boat due to similar opening and closing syllables of the words.

Conclusion and Suggestions:

While Trapey&Lindid prove artificial intelligence techniques and their effectiveness and accuracy with regards to image recognition for detecting trademark infringements they also observed that only image recognition was not a factor to establish infringement, as quotes also explore other factors such as strength and application of the disputed marks, the relatedness of the goods, defendants use of the mark, and finally the evidence of actual confusion.

IP policy more particularly designed more conducive towards human innovation

Value of human creation be balanced against AI innovation and creation

What will be AI's impact on the trademark creation? Will it be more difficult or easier ?

Due to the shift in consumer behaviour, there are various issues at the confluence of trademark and AI. The fact that the marketing industry, particularly e-commerce enterprises, heavily relies on AI to offer products to customers demonstrates the high reliance of brand value estimation on AI. With the growth of online shopping, there are more and more opportunities for comparative advertising, in which an AI application suggests a brand other than the one the customer is looking for in order to boost the provider's profit margins. However, if the customer falls victim to initial interest confusion, they may end up changing their minds and choosing the competing product supplier and AI provider instead. It is clear that the traditional IP rules in place today are unable to address these issues, necessitating their modification. In order to address the existing problems, it may be necessary to make changes to the incorporation of digital trademark rights, such as in the cases of meta-tags and AdWords. Additional clauses can be included to address digital trademark infringement through meta-tags, perhaps forbidding junior users from using catchy and recognisable terms even in their meta-tags that control the consumer's search results.

There is broad agreement and little doubt that over the next several years, AI will transform trademark prosecution and enforcement. A whopping 93% of firms are optimistic about the new technology, according to research included in the Hogan Lovells Brand Benchmarking 2018 report, which analysed over 200 brand owners from a variety of industries. According to 93% of respondents, time and money savings will be the major advantages of AI for trademark prosecution clearance searches.

AI is anticipated to make online infringement searches and the creation of take down notifications easier in terms of enforcement. Most of the firms questioned do not view AI as a danger, despite some worries about job security. Hogan Lovells' Asia Pacific and Middle East Head of Intellectual Property, Lloyd Parker, commented on the findings: "There is a great opportunity for brand owners to use AI to gain efficiencies, speed up their work and streamline processes, while reducing costs and ensuring resources are used effectively. However, there is a worrying lack of awareness about AI, and businesses risk missing out on its benefits due to insufficient knowledge and investment in the new technology. This is an area where all companies should be paying more attention and seeking out beneficial opportunities."¹

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