

Jason M. Drangel (JD 7204)
jdrangel@ipcounselors.com
Ashly E. Sands (AS 7715)
asands@ipcounselors.com
Brienne Scully (BS 3711)
bscully@ipcounselors.com
Danielle S. Yamali (DY 4228)
dfutterman@ipcounselors.com
EPSTEIN DRANGEL LLP
60 East 42nd Street, Suite 2520
New York, NY 10165
Telephone: (212) 292-5390
Facsimile: (212) 292-5391
Attorneys for Plaintiffs
Palace Skateboards Group and
GSLT Holdings Limited

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PALACE SKATEBOARDS GROUP and GSLT
HOLDINGS LIMITED,

CIVIL ACTION No. 20-cv-6108

Plaintiffs

v.

AAABBBLUCKY, AAPE888, ALIBOER006,
ANGELS02, ANGELS03, ANGELS04,
FASHIONBRAND888, FASHIONSHOPSS,
FINE_LIVE, FOG01, JORGE05, MINGTIAN3,
MUETHEZWJSDIIR, NINGSHOES,
OFF_WHITE666, PALM_10, PALM003,
PHEMIEMCUYRM, SCHWAZQKAPF,
SHANYAN04, STUSSYOEM, TOPPRO01,
TOPSTORE_999, WIZAROTTYEY, XIANNA,
YAOLEI001, YAOLEI003, YAOLEI007,
YAOLEI009, YINKUI111, YUNHUI07 and ZJY529,

Defendants





COMPLAINT


Jury Trial Requested

FILED UNDER SEAL

GLOSSARY

Term	Definition
Palace	Palace Skateboards Group
GSLT	GSLT Holdings Limited
Plaintiffs	Palace and GSLT
Defendants	Aaabbblucky, Aape888, Aliboer006, Angels02, Angels03, Angels04, Fashionbrand888, Fashionshopss, Fine_live, Fog01, Jorge05, Mingtian3, Muethezwjsdiir, Ningshoes, Off_white666, Palm_10, Palm003, Phemiemcuym, Schwazqkapf , Shanyan04, Stussyoem, Toppro01, Topstore_999, Wizarottyey, Xianna, Yaolei001, Yaolei003, Yaolei007, Yaolei009, Yinkui111, Yunhui07 and Zjy529
DHgate	Dunhuang Group d/b/a DHgate.com, an online marketplace and e-commerce platform which allows manufacturers, wholesalers and other third-party merchants, like Defendants, to advertise, distribute, offer for sale, sell and ship their wholesale and retail products originating from China directly to consumers worldwide and specifically to consumers residing in the U.S., including New York
Epstein Drangel	Epstein Drangel LLP, counsel for Plaintiff
New York Address	244 Madison Ave, Suite 411, New York, New York 10016
Complaint	Plaintiffs' Complaint filed on July 29, 2020
Application	Plaintiffs' <i>Ex Parte</i> Application for: 1) a temporary restraining order; 2) an order restraining Merchant Storefronts (as defined <i>infra</i>) and Defendants' Assets (as defined <i>infra</i>) with the Financial Institutions (as defined <i>infra</i>); 3) an order to show cause why a preliminary injunction should not issue; 4) an order authorizing bifurcated and alternative service and 5) an order authorizing expedited discovery filed on July 29, 2020
Hussey Dec.	Declaration of Thomas Hussey in Support of Plaintiffs' Application
Yamali Dec.	Declaration of Danielle S. Yamali in Support of Plaintiffs' Application
Palace Products	A London-based skateboard shop and clothing brand, which focuses on skate wear with heavy 1990s and pop culture influences alongside VHS style marketing found online or in Palace's four international stores, including, London, Los Angeles, New York and Tokyo, where it releases new products every Friday morning across its Spring/Summer/Autumn/Winter/Holiday seasons.

<p>Palace Registrations</p>	<p>U.S. Trademark Registration Nos: 5,225,520 for “PALACE” for goods in Classes 18, 25, 28 and 35; 5,197,782 for “PALACE SKATEBOARDS” for goods in Classes 28 and 35; 4,762,471 for</p>  <p>for goods in Classes 18, 25 and</p>  <p>28; 6,055,982 for</p>  <p>Class 25; 5,711,377 for</p> <p>goods in Class 25; and 5,220,519 for</p>  <p>for goods in Classes 18, 25, 28 and 35</p>
<p>Palace Applications</p>	<p>U.S. Trademark Serial Application Nos.: 88/500,470 for registration of “PALACE” for goods in Classes 35 and 41; and 88/500458 for registration of</p>

	 <p>for goods in Classes 35 and 41</p>
Palace Marks	The Marks covered by the Palace Registrations and Palace Applications
Counterfeit Products	Products bearing or used in connection with the Palace Marks, and/or products in packaging and/or containing labels bearing the Palace Marks, and/or bearing or used in connection with marks that are confusingly similar to the Palace Marks and/or products that are identical or confusingly similar to the Palace Products
Infringing Listings	Defendants' listings for Counterfeit Products
User Accounts	Any and all websites and any and all accounts with online marketplace platforms such as DHgate, as well as any and all as yet undiscovered accounts with additional online marketplace platforms held by or associated with Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them
Merchant Storefronts	Any and all User Accounts through which Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them operate storefronts to manufacture, import, export, advertise, market, promote, distribute, display, offer for sale, sell and/or otherwise deal in Counterfeit Products, which are held by or associated with Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them
Defendants' Assets	Any and all money, securities or other property or assets of Defendants (whether said assets are located in the U.S. or abroad)
Defendants' Financial Accounts	Any and all financial accounts associated with or utilized by any Defendants or any Defendants' User Accounts or Merchant Storefront(s) (whether said account is located in the U.S. or abroad)
Financial Institutions	Any and all banks, financial institutions, credit card companies and payment processing agencies, such as DHgate (<i>e.g.</i> , DHpay.com), PayPal Inc. ("PayPal"), Payoneer Inc. ("Payoneer") and PingPong Global

	Solutions, Inc. (“PingPong”) and other companies or agencies that engage in the processing or transfer of money and/or real or personal property of Defendants
Third Party Service Providers	Online platforms, including, without limitation, those owned and operated, directly or indirectly by DHgate, as well as any and all as yet undiscovered online marketplace platforms and/or entities through which Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them manufacture, import, export, advertise, market, promote, distribute, offer for sale, sell and/or otherwise deal in Counterfeit Products which are hereinafter identified as a result of any order entered in this action, or otherwise



Plaintiff Palace Skateboards Limited a private limited company organized and existing under the laws of England, and Plaintiff GSLT Holdings Limited, a private limited company Plaintiff Palace's parent company, by and through its undersigned counsel, allege as follows:¹

NATURE OF THE ACTION

1. This action involves claims for trademark infringement of Plaintiffs' federally registered trademarks in violation of § 32 of the Federal Trademark (Lanham) Act, 15 U.S.C. §§ 1051 *et seq.*; counterfeiting of Plaintiffs' federally registered trademarks in violation of 15 U.S.C. §§ 1114(1)(a)-(b), 1116(d) and 1117(b)-(c); trademark infringement of Plaintiffs' unregistered trademarks in violation of 15 U.S.C. § 1125; false designation of origin, passing off and unfair competition in violation of Section 43(a) of the Trademark Act of 1946, as amended (15 U.S.C. §1125(a)); and related state and common law claims, arising from the infringement of the Palace Marks, including, without limitation, by manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale and/or selling unlicensed, counterfeit and infringing versions of Plaintiffs' Palace Products by Defendants.

JURISDICTION AND VENUE

2. This Court has federal subject matter jurisdiction over the claims asserted in this Action pursuant to 28 U.S.C. §§ 1331 and 1338(a), as well as pursuant to 15 U.S.C. § 1121 as an action arising out of violations of the Lanham Act, 15 U.S.C. §§ 1051 *et seq.*; pursuant to 28 U.S.C. §1338(b) as an action arising out of claims for false designation of origin and unfair competition and pursuant to 28 U.S.C. § 1332, as there is diversity between the parties and the matter in controversy exceeds, exclusive of interests and costs, the sum of seventy-five thousand dollars. This Court has supplemental jurisdiction pursuant to 28 U.S.C. §§1367(a), as the claims asserted thereunder are so

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary.

closely related to the federal claims brought in this Action as to form part of the same case or controversy.

3. Personal jurisdiction exists over Defendants in New York pursuant to N.Y.C.P.L.R. § 302(a)(1) and N.Y.C.P.L.R. § 302(a)(3), or in the alternative, Federal Rule of Civil Procedure 4(k), because, upon information and belief, Defendants regularly conduct, transact and/or solicit business in New York, and/or derive substantial revenue from their business transactions in New York and/or otherwise avail themselves of the privileges and protections of the laws of the State of New York such that this Court's assertion of jurisdiction over Defendants does not offend traditional notions of fair play and due process, and/or Defendants' illegal counterfeiting and infringing actions caused injury to Plaintiffs in New York such that Defendants should reasonably expect such actions to have consequences in New York, for example:

a. Upon information and belief, Defendants were and/or are systematically directing and/or targeting their business activities at consumers in the U.S., including New York, through accounts with online marketplace platforms such as DHgate as well as any and all as yet undiscovered User Accounts, through which consumers in the U.S., including New York, can view one or more of Defendants' Merchant Storefronts that each Defendant operates, uses to communicate with Defendants regarding their listings for Counterfeit Products and to place orders for, receive invoices for and purchase Counterfeit Products for delivery in the U.S., including New York, as a means for establishing regular business with the U.S., including New York.

b. Upon information and belief, Defendants are sophisticated sellers, each operating one or more commercial businesses through their respective User Accounts, using their Merchant Storefronts to manufacture, import, export, advertise, market, promote,

distribute, offer for sale and/or otherwise deal in products, including the Counterfeit Products at significantly below-market prices to consumers worldwide, including to those in the U.S., and specifically New York.

c. Upon information and belief, all Defendants accept payment in U.S. Dollars and offer shipping to the U.S., including to New York and specifically to the New York Address.

d. Upon information and belief, Defendants have transacted business with consumers located in the U.S., including New York, for the sale and shipment of Counterfeit Products.

e. Upon information and belief, Defendants are aware of Plaintiffs, their Palace Products and Palace Marks, and are aware that their illegal counterfeiting and infringing actions alleged herein are likely to cause injury to Plaintiffs in the U.S. and specifically, in New York.

4. Venue is proper, *inter alia*, pursuant to 28 U.S.C. § 1391 because, upon information and belief, Defendants conduct, transact and/or solicit business in New York.

THE PARTIES

5. Plaintiff Palace is a private limited company organized and existing under the laws of the England, and Plaintiff GSLT is Palace's parent company, also a private limited company organized and existing under the laws of England.

6. Upon information and belief, Defendants are merchants on the DHgate online marketplace platform, through which Defendants offer for sale and/or sell Counterfeit Products, with a principal place of business at the addresses identified, if any, in the printouts of screenshots of Defendants' Merchant Storefronts in **Exhibit C**.

GENERAL ALLEGATIONS

Palace and its Well Known Products

7. Palace launched in or about 2009, is a London-based skateboard shop and clothing brand, and sells the Palace Products, which are distributed through various channels of trade in the U.S. and abroad. Images of the Palace Products are attached hereto as **Exhibit A** and incorporated herein by reference.

8. The Palace Products are marketed under the Palace trademarks. The Palace Brand is recognized for its distinctive graphic and logo-heavy designs, specifically a unique design mark comprised of a triangle with the words “Palace” written within it. The Palace triangular design, well known and recognized as the “Tri-Ferg”, has been, and currently still is, applied to the Palace Products themselves, as well as tags, labels, containers, packaging and displays for the Palace Products.

9. The Palace Products are sold via Palace’s own retail stores located in prominent fashion epicenters such as London, Los Angeles, New York City, and Tokyo its online websites, and in retail concessions at luxury retailer Dover Street Market.

10. Since the launch of Palace approximately eleven (11) years ago, the Palace Brand and Palace Products have been featured in numerous press publications, including, but not limited to, *Vogue*, *ID Magazine* and *GQ*, among others. Palace has collaborated with brands such as Adidas, Evisu, Gore-Tex, Jean-Charles de Castelbajac, Juventus FC, Reebok, Ralph Lauren and Salomon.

11. The Palace Products retail from \$48.00 for a basic Tee Shirt, to \$1,000.00 for a Luxury Jacket.

12. The success of the Palace Products is due in part to Palace’s marketing and promotional efforts. These efforts include advertising and promotion through social media, Palace’s website (available at <https://www.palaceskateboards.com>), and other internet-based and print advertising,

among other efforts domestically and abroad, including in New York.

13. Palace's success is also due to its use of high-quality materials and processes in making the Palace Products.

14. Palace's efforts, the quality of its Palace Products, its marketing, promotions and distribution efforts, as well as the word-of-mouth-buzz generated by its consumers, have made the Palace Products and Palace Marks prominently placed in the minds of the public. Retailers, retail buyers, consumers and members of the public have become familiar with the Palace Products and Palace Marks and associate them exclusively with Palace.

15. As a result of such associations, Palace and its Palace Marks have acquired a valuable reputation and goodwill among the public.

16. Palace has gone to great lengths to protect its interests in and to the Palace Products and Palace Marks. Palace is a direct to consumer brand, no one other than Palace and its authorized licensees and distributors are authorized to manufacture, import, export, advertise, offer for sale or sell any goods utilizing the Palace Marks, or use the Palace Marks in connection with goods or services or otherwise, without the express permission of Palace.

DHgate and Defendants' User Accounts

17. DHgate.com is an online marketplace and e-commerce platform which allows manufacturers, wholesalers and other third-party merchants, like Defendants, to advertise, offer for sale, sell and ship their wholesale and retail products originating from China to consumers worldwide and specifically to consumers residing in the U.S., including New York.

18. As one of the leaders of the worldwide e-commerce and digital retail market, DHgate has generated billions in sales worldwide. International buyers, including those in the U.S., make up a significant percentage of the business done on DHgate. For example, DHgate offers 25 million

consumer products from 1.2 million suppliers for sale on its platform and attributes over half of its sales to U.S. buyers alone.

19. As recently addressed in news reports, and as reflected in the federal lawsuits filed against third-party merchants offering for sale and selling infringing and/or counterfeit products on DHgate, 85% of the world's counterfeit goods originate from China. The rise of Chinese e-commerce platforms, including DHgate, have greatly increased consumers' access to counterfeit goods.

20. The Office of the United States Trade Representative ("USTR") publishes an annual "Notorious Markets List," which highlights specific physical and online markets around the world that are reported to be engaging in and facilitating substantial copyright piracy and trademark counterfeiting and which is intended to help the U.S. and foreign governments prioritize intellectual property rights enforcement that protects job-supporting innovation and creativity in the U.S. and around the world. In January 2018, the USTR released the results of its Special 301 Out-of-Cycle Review of Notorious Markets for 2017 and it named DHgate as a "particularly infamous Notorious Market." With more than 33 million product listings originating from China available for purchase to consumers overseas, rights holders have consistently reported challenges with the counterfeit goods available on DHgate.

21. Defendants are individuals and/or businesses, who, upon information and belief, are located in China but conduct business in the U.S. and other countries by means of their User Accounts and Merchant Storefronts on DHgate as well as potential yet undiscovered additional online marketplace platforms.

22. Through their Merchant Storefronts, Defendants offer for sale and/or sell consumer products, including Counterfeit Products, and target and ship such products to customers located in

the U.S., including New York, and throughout the world.

23. Defendants' Merchant Storefronts share unique identifiers, such as design elements along with similarities in price, description of the goods offered and of the Counterfeit Products themselves offered for sale.

24. Defendants are in constant communication with each other and regularly participate in online chatroom discussions involving illegal counterfeiting activities, pending litigation and potential new lawsuits.

Defendants' Wrongful and Infringing Conduct

25. Particularly in light of Plaintiffs' success with their Palace Products, as well as the reputation they have gained, Plaintiffs and their Palace Products have become targets for unscrupulous individuals and entities who wish to capitalize on the goodwill, reputation and fame that Plaintiffs have amassed in their Palace Products and Palace Marks and Plaintiffs investigate and enforce against such activities.

26. Through Epstein Drangel's investigative and enforcement efforts, Plaintiffs learned of Defendants' actions which vary and include, but are not limited to: manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale and/or selling Counterfeit Products to U.S. consumers, including those located in the state of New York, through Defendants' User Accounts and Merchant Storefronts. Printouts of Infringing Listings from Defendants' User Accounts and Merchant Storefronts are included in **Exhibit C** attached hereto and incorporated herein by reference.

27. Defendants are not, and have never been, authorized by Plaintiffs or any of their authorized agents, authorized licensees or authorized distributors to copy, manufacture, import, export, advertise, distribute, offer for sale or sell the Palace Products or to use the Palace Marks, or

any marks that are confusingly similar to the Palace Marks.

28. Defendants' Counterfeit Products are nearly indistinguishable from Plaintiffs' Palace Products, only with minor variations that no ordinary consumer would recognize.

29. During its investigation, Epstein Drangel identified Defendants as offering for sale and/or selling Counterfeit Products and specified a shipping address located at the New York Address and verified that each Defendant provides shipping to the New York Address. Printouts of the checkout pages for the Counterfeit Products and pages from Defendants' Merchant Storefronts reflecting that the Defendants ship the Counterfeit Products to the New York Address are included in **Exhibit C**.

30. Epstein Drangel confirmed that each Defendant is still currently offering for sale and/or selling Counterfeit Products through their respective User Accounts and/or Merchant Storefronts, accepting payment for such Counterfeit Products in U.S. Dollars and that each Defendant provides shipping and/or has actually shipped Counterfeit Products to the U.S., including to customers located in New York. Plaintiffs' findings are supported by Defendants' Infringing Listings and/or the checkout pages for Counterfeit Products, which are included in **Exhibit C**.

31. For example, below on the left is an image of one of Plaintiffs' Palace Products. Depicted further below is a listing for Defendant Aape888's Counterfeit Product ("Aape888 Infringing Listing" and "Aape888 Counterfeit Product," respectively). The Aape888 Infringing Listing appears on Defendant Aape888's Merchant Storefront, <https://www.dhgate.com/store/21407000>, and offers the Aape888 Counterfeit Product for \$53.99 per item, using, featuring and/or incorporating one or more of the Palace Marks and/or confusingly similar marks in the descriptions and/or product images in the body of the listing. Further, the Aape888 Counterfeit Product is virtually identical to one of Plaintiffs' Palace Products and features

and/or incorporates one or more of the Palace Marks. There is no question that the Aape888 Counterfeit Product is designed to confuse and mislead consumers into believing that they are purchasing one of Plaintiffs' Palace Products or that the Aape888 Counterfeit Product is otherwise approved by or sourced from Plaintiffs, thereby trading off of the goodwill and reputation of Plaintiffs by engaging in the unauthorized use of one or more of the Palace Marks:

Palace Product



Defendant's Counterfeit Product



32. By way of another example, below on the left is an image of one of Plaintiffs' Palace Products. Depicted further below is a listing for Defendant Phemiemcuym's Counterfeit Product ("Phemiemcuym Infringing Listing" and "Phemiemcuym Counterfeit Product," respectively). The Phemiemcuym Infringing Listing appears on Defendant Phemiemcuym's Merchant Storefront, <https://www.dhgate.com/store/21095026>, and offers the Phemiemcuym Counterfeit Product for \$40.61 - \$57.49 per item, using, featuring and/or incorporating one or more of the Palace Marks and/or confusingly similar marks in the descriptions and/or product images in the body of the listing. Further, the Phemiemcuym Counterfeit Product is virtually identical to one of Plaintiffs' Palace Products and features and/or incorporates one or more of the Palace Marks. There is no question that the Phemiemcuym Counterfeit Product is designed to confuse and mislead

consumers into believing that they are purchasing one of Plaintiffs' Palace Products or that the Phemiemcuym Counterfeit Product is otherwise approved by or sourced from Plaintiffs, thereby trading off of the goodwill and reputation of Plaintiffs by engaging in the unauthorized use of one or more of the Palace Marks:

Palace Product



Defendant's Counterfeit Product



33. As another example, below on the left is an image of one of Plaintiffs' Palace Products. Depicted further below is a listing for Defendant Shanyan04's Counterfeit Product ("Shanyan04 Infringing Listing" and "Shanyan04 Counterfeit Product," respectively). The Shanyan04 Infringing Listing appears on Defendant Shanyan04's Merchant Storefront, <https://dhgate.com/store/>, and offers the Shanyan04 Counterfeit Product for \$47.93 - \$56.54 per item, using, featuring and/or incorporating one or more of the Palace Marks and/or confusingly similar marks in the descriptions and/or product images in the body of the listing. Further, the Shanyan04 Counterfeit Product is virtually identical to one of Plaintiffs' Palace Products and features and/or incorporates one or more of the Palace Marks. There is no question that the Shanyan04 Counterfeit Product is designed to confuse and mislead consumers into believing that they are purchasing one of Plaintiffs' Palace Products or that the Shanyan04 Counterfeit Product is otherwise approved by or sourced from Plaintiffs, thereby trading off of the goodwill and reputation

of Plaintiffs by engaging in the unauthorized use of one or more of the Palace Marks:

Palace Product



Defendant's Counterfeit Product



34. By these dealings in Counterfeit Products (including, without limitation, copying, manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale and/or selling Counterfeit Products), Defendants violated Plaintiffs' exclusive rights in the Palace Marks, and have used marks that are confusingly similar to, identical to and/or constitute counterfeiting and/or infringement of the Palace Marks in order to confuse consumers into believing that such Counterfeit Products are the Palace Products and aid in the promotion and sales of their Counterfeit Products. Defendants' conduct began long after Plaintiffs' adoption and use of the Palace Marks, after Plaintiffs obtained federal registrations in the Palace Marks, as alleged above, and after Plaintiffs' Palace Products and Palace Marks became well-known to the purchasing public.

35. Prior to and contemporaneous with their counterfeiting and infringing actions alleged herein, Defendants had knowledge of Plaintiffs' ownership of the Palace Marks, of the fame and incalculable goodwill associated therewith and of the popularity and success of the Palace Products, and in bad faith adopted the Palace Marks.

36. Defendants have been engaging in the illegal counterfeiting and infringing actions, as

alleged herein, knowingly and intentionally, or with reckless disregard or willful blindness to Plaintiffs' rights, or in bad faith, for the purpose of trading on the goodwill and reputation of Plaintiffs, the Palace Marks and Palace Products.

37. Defendants' dealings in Counterfeit Products, as alleged herein, has caused, and will continue to cause confusion, mistake, economic loss, and has, and will continue to deceive consumers, the public and the trade with respect to the source or origin of Defendants' Counterfeit Products, thereby causing consumers to erroneously believe that such Counterfeit Products are licensed by or otherwise associated with Plaintiffs, thereby damaging Plaintiffs.

38. By engaging in these actions, Defendants have, jointly and severally, among other things, willfully and in bad faith committed the following, all of which have and will continue to cause irreparable harm to Plaintiffs: infringed and counterfeited the Palace Marks, committed unfair competition and unfairly and unjustly profited from such activities at Plaintiffs' expense.

39. Unless enjoined, Defendants will continue to cause irreparable harm to Plaintiffs.

CAUSES OF ACTION

FIRST CAUSE OF ACTION (Trademark Counterfeiting)

[15 U.S.C. § 1114(1)(b)/Lanham Act § 32; 15 U.S.C. § 1116(d)/Lanham Act § 34; 15 U.S.C. § 1117(b)-(c)/Lanham Act § 35]

40. Plaintiffs replead and incorporates by reference each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

41. Plaintiff GSLT is the exclusive owner of all right and title to the Palace Marks. Plaintiff Palace is the exclusive licensee of the Palace Marks.

42. Plaintiffs have continuously used the Palace Marks in interstate commerce since on or before the dates of first use as reflected in the registration certificates attached hereto as **Exhibit B**.

43. Without Plaintiffs' authorization or consent, with knowledge of Plaintiffs' well-known and prior rights in its Palace Marks and with knowledge that Defendants' Counterfeit Products bear counterfeit marks, Defendants intentionally reproduced, copied and/or colorably imitated the Palace Marks and/or used spurious designations that are identical with, or indistinguishable from, the Palace Marks on or in connection with the manufacturing, import, export, advertising, marketing, promotion, distribution, display, offering for sale and/or sale of Counterfeit Products.

44. Defendants have manufactured, imported, exported, advertised, marketed, promoted, distributed, displayed, offered for sale and/or sold their Counterfeit Products to the purchasing public in direct competition with Plaintiffs, in or affecting interstate commerce, and/or have acted with reckless disregard of Plaintiffs' rights in and to the Palace Marks through their participation in such activities.

45. Defendants have applied their reproductions, counterfeits, copies and colorable imitations of the Palace Marks to packaging, point-of-purchase materials, promotions and/or advertisements intended to be used in commerce upon, or in connection with the manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale and/or selling of Defendants' Counterfeit Products, which is likely to cause confusion, mistake, and deception among the general purchasing public as to the origin of the Counterfeit Products, and is likely to deceive consumers, the public and the trade into believing that the Counterfeit Products sold by Defendants originate from, are associated with or are otherwise authorized by Plaintiffs, thereby making substantial profits and gains to which they are not entitled in law or equity.

46. Defendants' unauthorized use of the Palace Marks on or in connection with the Counterfeit Products was done with notice and full knowledge that such use was not authorized or

licensed by Plaintiffs or their authorized agents and with deliberate intent to unfairly benefit from the incalculable goodwill inherent in the Palace Marks.

47. Defendants' actions constitute willful counterfeiting of the Palace Marks in violation of 15 U.S.C. §§ 1114(1)(a)-(b), 1116(d) and 1117(b)-(c).

48. As a direct and proximate result of Defendants' illegal actions alleged herein, Defendants have caused substantial monetary loss and irreparable injury and damage to Plaintiffs, their business, their reputation and their valuable rights in and to the Palace Marks and the goodwill associated therewith, in an amount as yet unknown, but to be determined at trial, for which Plaintiffs have no adequate remedy at law, and unless immediately enjoined, Defendants will continue to cause such substantial and irreparable injury, loss and damage to Plaintiffs and their valuable Palace Marks.

49. Based on Defendants' actions as alleged herein, Plaintiffs are entitled to injunctive relief, damages for the irreparable harm that Plaintiffs have sustained, and will sustain, as a result of Defendants' unlawful and infringing actions, as alleged herein, and all gains, profits and advantages obtained by Defendants as a result thereof, enhanced discretionary damages, treble damages and/or statutory damages of up to \$2,000,000 per counterfeit mark per type of goods sold, offered for sale or distributed and reasonable attorneys' fees and costs.

**SECOND CAUSE OF ACTION
(Infringement of Registered Trademarks)
[115 U.S.C. § 1114/Lanham Act § 32(a)]**

50. Plaintiffs replead and incorporate by reference each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

51. Plaintiffs have continuously used the Palace Marks in interstate commerce since on or before the dates of first use as reflected in the registration certificates attached hereto as **Exhibit**

B.

52. Plaintiff GSLT, as owner of all right, title and interest in and to the Palace Marks, has standing to maintain an action for trademark infringement under 15 U.S.C. § 1114.

53. Defendants were, at the time they engaged in their actions as alleged herein, actually aware that Plaintiff GSLT is the owner of the federal trademark registrations for the Palace Marks, and/or that Plaintiff Palace is the exclusive licensee of the Palace Marks.

54. Defendants did not seek and thus inherently failed to obtain consent or authorization from Plaintiffs, as the registered trademark owner of the Palace Marks, to deal in and commercially manufacture, import, export, advertise, market, promote, distribute, display, retail, offer for sale and/or sell the Palace Products and/or related products bearing the Palace Marks into the stream of commerce.

55. Defendants knowingly and intentionally manufactured, imported, exported, advertised, marketed, promoted, distributed, displayed, offered for sale and/or sold Counterfeit Products, bearing and/or utilizing marks that are reproductions, counterfeits, copies and/or colorable imitations of the Palace Marks and/or which are identical or confusingly similar to the Palace Marks.

56. Defendants knowingly and intentionally reproduced, copied and colorably imitated the Palace Marks and applied such reproductions, copies or colorable imitations to packaging, wrappers, receptacles, online listings and/or advertisements used in commerce upon, or in connection with the manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale and/or sale of Defendants' Counterfeit Products.

57. Defendants were, at the time they engaged in their illegal and infringing actions as alleged herein, actually aware that Plaintiffs are the owners of all rights in and to the Palace Marks.

58. Defendants' egregious and intentional use of the Palace Marks in commerce on or in connection with Defendants' Counterfeit Products has caused, and is likely to continue to cause, actual confusion and mistake, and has deceived, and is likely to continue to deceive, the general purchasing public as to the source or origin of the Counterfeit Products, and is likely to deceive the public into believing that Defendants' Counterfeit Products are Plaintiffs' Palace Products or are otherwise associated with, or authorized by, Plaintiffs.

59. Defendants' actions have been deliberate and committed with knowledge of Plaintiffs' rights and goodwill in the Palace Marks, as well as with bad faith and the intent to cause confusion, mistake and deception.

60. Defendants' continued, knowing, and intentional use of the Palace Marks without Plaintiffs' consent or authorization constitutes intentional infringement of Plaintiffs' federally registered Palace Marks in violation of §32 of the Lanham Act, 15 U.S.C. § 1114.

61. As a direct and proximate result of Defendants' illegal and infringing actions as alleged herein, Plaintiffs have suffered substantial monetary loss and irreparable injury, loss and damage to their business and their valuable rights in and to the Palace Marks and the goodwill associated therewith in an amount as yet unknown, but to be determined at trial, for which Plaintiffs have no adequate remedy at law, and unless immediately enjoined, Defendants will continue to cause such substantial and irreparable injury, loss and damage to Plaintiffs and the valuable Palace Marks.

62. Based on Defendants' actions as alleged herein, Plaintiffs are entitled to injunctive relief, damages for the irreparable harm that Plaintiffs have sustained, and will sustain, as a result of Defendants' unlawful and infringing actions as alleged herein, and all gains, profits and advantages obtained by Defendants as a result thereof, enhanced discretionary damages, as well as

other remedies provided by 15 U.S.C. §§ 1116, 1117, and 1118, and reasonable attorneys' fees and costs.

**THIRD CAUSE OF ACTION
(Infringement of Unregistered Trademark)
[15 U.S.C. § 1125/Lanham Act § 43(a)]**

63. Plaintiffs plead and incorporate by reference each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

64. Plaintiffs have continuously used the Palace Applications in interstate commerce since on or before the dates of first use as reflected in the respective application attached hereto as Exhibit B.

65. Plaintiff GSLT, as the owner of all right, title and interest in and to the Palace Applications, has standing to maintain an action for trademark infringement under 15 U.S.C. § 1125.

66. Defendants were, at the time they engaged in their actions as alleged herein, actually aware that Plaintiffs are the owner of the Palace Applications.

67. Defendants did not seek, and therefore necessarily failed, to obtain consent or authorization from Plaintiffs, as the trademark owner of the Palace Applications, to deal in and commercially manufacture, import, export, advertise, market, promote, distribute, display, retail, offer for sale and/or sell Palace Products and/or related products bearing the Palace Applications into the stream of commerce.

68. Defendants knowingly and intentionally manufactured, imported, exported, advertised, marketed, promoted, distributed, displayed, offered for sale and/or sold Counterfeit Products bearing and/or utilizing marks that are reproductions, copies and/or colorable imitations of the Palace Applications and/or which are identical or confusingly similar to the Palace

Applications.

69. Defendants knowingly and intentionally reproduced, copied and colorably imitated the Palace Applications and applied such reproductions, copies or colorable imitations to packaging, wrappers, receptacles, online listings and/or advertisements used in commerce upon or in connection with the manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale and/or sale of Defendants' Counterfeit Products.

70. Defendants were, at the time they engaged in their illegal and infringing actions as alleged herein, actually aware that Plaintiffs are the owners of all rights in and to the Palace Applications.

71. Defendants' egregious and intentional use of the Palace Applications in commerce on or in connection with Defendants' Counterfeit Products has caused, and is likely to continue to cause, actual confusion and mistake, and has deceived, and is likely to continue to deceive, the general purchasing public as to the source or origin of the Counterfeit Products, and is likely to deceive the public into believing that Defendants' Counterfeit Products are Palace Products or are otherwise associated with or authorized by Plaintiffs.

72. Defendants' actions have been deliberate and committed with knowledge of Plaintiffs' rights and goodwill in the Palace Applications, as well as with bad faith and the intent to cause confusion, mistake and deception.

73. Defendants' continued, knowing and intentional use of the Palace Applications without Plaintiffs' consent or authorization constitutes intentional infringement of the Palace Applications in violation of §43 of the Lanham Act, 15 U.S.C. § 1125.

74. As a direct and proximate result of Defendants' illegal and infringing actions as alleged herein, Plaintiffs have suffered substantial monetary loss and irreparable injury, loss and

damage to their business and their valuable rights in and to the Palace Applications and the goodwill associated therewith in an amount as yet unknown, but to be determined at trial, for which they has no adequate remedy at law, and unless immediately enjoined, Defendants will continue to cause such substantial and irreparable injury, loss and damage to Plaintiffs and their valuable Palace Applications.

75. Based on Defendants' actions as alleged herein, Plaintiffs are entitled to injunctive relief, damages for the irreparable harm that Plaintiffs have sustained and will sustain as a result of Defendants' unlawful and infringing actions as alleged herein, and all gains, profits and advantages obtained by Defendants as a result thereof, enhanced discretionary damages, as well as other remedies provided by 15 U.S.C. §§ 1116, 1117 and 1118, and reasonable attorneys' fees and costs.

FOURTH CAUSE OF ACTION
(False Designation of Origin, Passing Off & Unfair Competition)
[15 U.S.C. § 1125(a)/Lanham Act § 43(a)]

76. Plaintiffs replead and incorporate by reference each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

77. Plaintiff GSLT, as the owner of all right, title and interest in and to the Palace Marks has standing to maintain an action for false designation of origin and unfair competition under the Federal Trademark Statute, Lanham Act § 43(a) (15 U.S.C. § 1125).

78. The Palace Marks are inherently distinctive and/or have acquired distinctiveness.

79. Defendants knowingly and willfully used in commerce products and/or packaging designs that are identical or confusingly similar to, and constitute reproductions of the Palace Marks and affixed, applied and used false designations of origin and false and misleading descriptions and representations on or in connection with the manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale and/or sale of Counterfeit Products

with the intent to cause confusion, to cause mistake and to deceive the purchasing public into believing, in error, that Defendants' substandard Counterfeit Products are Palace Products or related products, and/or that Defendants' Counterfeit Products are authorized, sponsored, approved, endorsed or licensed by Plaintiffs and/or that Defendants are affiliated, connected or associated with Plaintiffs, thereby creating a likelihood of confusion by consumers as to the source of such Counterfeit Products, and allowing Defendants to capitalize on the goodwill associated with, and the consumer recognition of, the Palace Marks, to Defendants' substantial profit in blatant disregard of Plaintiffs' rights.

80. By manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale, selling and/or otherwise dealing in the Counterfeit Products that are identical to, confusingly similar to or which constitute colorable imitations of Plaintiffs' Palace Products using marks that are identical and/or confusingly similar to, or which constitute colorable imitations of the Palace Marks, Defendants have traded off the extensive goodwill of Plaintiffs and their Palace Products and did in fact induce, and intend to, and will continue to induce customers to purchase Defendants' Counterfeit Products, thereby directly and unfairly competing with Plaintiffs. Such conduct has permitted and will continue to permit Defendants to make substantial sales and profits based on the goodwill and reputation of Plaintiffs and their Palace Marks, which Plaintiffs have amassed through their nationwide marketing, advertising, sales and consumer recognition.

81. Defendants knew, or by the exercise of reasonable care should have known, that their adoption and commencement of and continuing use in commerce of marks that are identical or confusingly similar to and constitute reproductions of the Palace Marks would cause confusion, mistake or deception among purchasers, users and the public.

82. Upon information and belief, Defendants' aforementioned wrongful actions have been knowing, deliberate, willful, intended to cause confusion, to cause mistake and to deceive the purchasing public and with the intent to trade on the goodwill and reputation Plaintiffs, their Palace Products and Palace Marks.

83. As a direct and proximate result of Defendants' aforementioned actions, Defendants have caused irreparable injury to Plaintiffs by depriving Plaintiffs of sales of their Palace Products and by depriving Plaintiffs of the value of their Palace Marks as commercial assets in an amount as yet unknown, but to be determined at trial, for which they have no adequate remedy at law, and unless immediately restrained, Defendants will continue to cause substantial and irreparable injury to Plaintiffs and the goodwill and reputation associated with the value of the Palace Marks.

84. Based on Defendants' wrongful conduct, Plaintiffs are entitled to injunctive relief as well as monetary damages and other remedies as provided by the Lanham Act, including damages that Plaintiffs have sustained and will sustain as a result of Defendants' illegal and infringing actions as alleged herein, and all gains, profits and advantages obtained by Defendants as a result thereof, enhanced discretionary damages and reasonable attorneys' fees and costs.

**FIFTH CAUSE OF ACTION
(Unfair Competition)
[New York Common Law]**

85. Plaintiffs plead and incorporate by reference each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

86. By manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale, selling and/or otherwise dealing in the Counterfeit Products, Defendants have traded off the extensive goodwill of Plaintiffs and their Palace Products to induce, and did induce and intend and will continue to induce, customers to purchase their

Counterfeit Products, thereby directly competing with Plaintiffs. Such conduct has permitted and will continue to permit Defendants to make substantial sales and profits based on the goodwill and reputation of Plaintiffs, which Plaintiffs have amassed through its nationwide marketing, advertising, sales and consumer recognition.

87. Defendants' advertising, marketing, promoting, distributing, displaying, offering for sale, selling and/or otherwise dealing in the Counterfeit Products was and is in violation and derogation of Plaintiffs' rights and is likely to cause confusion and mistake, and to deceive consumers and the public as to the source, origin, sponsorship or quality of Defendants' Counterfeit Products.

88. Defendants knew, or by the exercise of reasonable care should have known, that their advertising, marketing, promoting, distributing, displaying, offering for sale, selling and/or otherwise dealing in the Counterfeit Products and their continuing advertising, marketing, promoting, distributing, displaying, offering for sale, selling and/or otherwise dealing in the Counterfeit Products would cause confusion and mistake, or deceive purchasers, users and the public.

89. Upon information and belief, Defendants' aforementioned wrongful actions have been knowing, deliberate, willful, intended to cause confusion and mistake, and to deceive, in blatant disregard of Plaintiffs' rights, and for the wrongful purpose of injuring Plaintiffs, and their competitive position while benefiting Defendants.

90. As a direct and proximate result of Defendants' aforementioned wrongful actions, Plaintiffs have been and will continue to be deprived of substantial sales of the Palace Products in an amount as yet unknown but to be determined at trial, for which Plaintiffs have no adequate remedy at law, and Plaintiffs have been and will continue to be deprived of the value of the Palace

Marks as commercial assets in an amount as yet unknown but to be determined at trial, for which Plaintiffs have no adequate remedy at law.

91. As a result of Defendants' actions alleged herein, Plaintiffs are entitled to injunctive relief, an order granting Plaintiffs' damages and Defendants' profits stemming from their infringing activities, and exemplary or punitive damages for Defendants' intentional misconduct.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs prays for judgment against Defendants, inclusive, and each of them, as follows:

A. For an award of Defendants' profits and Plaintiffs' damages pursuant to 15 U.S.C. § 1117(a), enhanced discretionary damages under 15 U.S.C. § 1117(a)(3) and treble damages in the amount of a sum equal to three (3) times such profits or damages, whichever is greater, pursuant to 15 U.S.C. § 1117(b) for willfully and intentionally using a mark or designation, knowing such mark or designation is a counterfeit mark in violation of 15 U.S.C. § 1114(1)(a);

B. In the alternative to Defendants' profits and Plaintiffs' actual damages, enhanced discretionary damages and treble damages for willful use of a counterfeit mark in connection with the sale, offering for sale or distribution of goods or services, for statutory damages pursuant to 15 U.S.C. § 1117(c) in the amount of not more than \$2,000,000 per counterfeit mark per type of goods or services sold, offered for sale or distributed, as the Court considers just, which Plaintiffs may elect prior to the rendering of final judgment;

C. For an award of Defendants' profits and Plaintiffs' damages in an amount to be proven at trial for willful trademark infringement of Plaintiffs' federally registered Palace Marks, and such other compensatory damages as the Court determines to be fair and

appropriate pursuant to 15 U.S.C. § 1117(a);

D. For an award of Defendants' profits and Plaintiffs' damages pursuant to 15 U.S.C. § 1117(a) in an amount to be proven at trial and such other compensatory damages as the Court determines to be fair and appropriate pursuant to 15 U.S.C. § 1117(a) for false designation of origin and unfair competition under 15 U.S.C. § 1125(a);

E. For an award of damages to be proven at trial for common law unfair competition;

F. For a preliminary and permanent injunction by this Court enjoining and prohibiting Defendants, or their agents, and any employees, agents, servants, officers, representatives, directors, attorneys, successors, affiliates, assigns and entities owned or controlled by Defendants, and all those in active concert or participation with Defendants, and each of them who receives notice directly or otherwise of such injunction from:

- i. manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale, selling and/or otherwise dealing in the Counterfeit Products;
- ii. directly or indirectly infringing in any manner any of Plaintiffs' Palace Marks;
- iii. using any reproduction, counterfeit, copy or colorable imitation of Plaintiffs' Palace Marks to identify any goods or services not authorized by Plaintiffs;
- iv. using any of Plaintiffs' Palace Marks or any other marks that are confusingly similar to the Palace Marks, on or in connection with Defendants' manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale, selling and/or otherwise dealing in the Counterfeit Products;
- v. using any false designation of origin or false description, or engaging in any

action which is likely to cause confusion, cause mistake and/or to deceive members of the trade and/or the public as to the affiliation, connection or association of any product manufactured, imported, exported, advertised, marketed, promoted, distributed, displayed, offered for sale or sold by Defendants with Plaintiffs, and/or as to the origin, sponsorship or approval of any product manufactured, imported, exported, advertised, marketed, promoted, distributed, displayed, offered for sale or sold by Defendants and Defendants' commercial activities by Plaintiffs;

- vi. engaging in the unlawful, unfair or fraudulent business acts or practices, including, without limitation, the actions described herein, including the of advertising and/or dealing in any Counterfeit Products;
- vii. engaging in any other actions that constitute unfair competition with Plaintiffs;
- viii. engaging in any other act in derogation of Plaintiffs' rights;
- ix. from secreting, concealing, destroying, altering, selling off, transferring or otherwise disposing of and/or dealing with: (i) Counterfeit Products; (ii) any computer files, data, business records, documents or any other records or evidence relating to Defendants' User Accounts or Merchant Storefronts, Defendants' Assets from or to Defendants' Financial Accounts and the manufacture, importation, exportation, advertising, marketing, promotion, distribution, display, offering for sale and/or sale of Counterfeit Products;
- x. from secreting, concealing, transferring, disposing of, withdrawing, encumbering or paying any of Defendants' Assets from or Defendants'

Financial Accounts until further ordered by this Court;

- xi. effecting assignments or transfers, forming new entities or associations, or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth in any final judgment or order in this action;
- xii. providing services to Defendants, Defendants' User Accounts and Defendants' Merchant Storefronts, including, without limitation, continued operation of Defendants' User Accounts and Merchant Storefronts; and
- xiii. instructing any other person or entity to engage or perform any of the activities referred to in subparagraphs (i) through (xii) above; and

G. For an order of the Court requiring that Defendants recall from any distributors and retailers and deliver up to Plaintiffs for destruction any and all Counterfeit Products and any and all packaging, labels, tags, advertising and promotional materials and any other materials in the possession, custody or control of such distributors and retailers that infringe any of Plaintiffs' Palace Marks, or bear any marks that are confusingly similar to the Palace Marks;

H. For an order of the Court requiring that Defendants deliver up for destruction to Plaintiffs any and all Counterfeit Products and any and all packaging, labels, tags, advertising and promotional materials and any other materials in the possession, custody or control of Defendants that infringe any of Plaintiffs' Palace Marks, or bear any marks that are confusingly similar to the Palace Marks pursuant to 15 U.S.C. § 1118;

I. For an order from the Court requiring that Defendants provide complete accountings for any and all monies, profits, gains and advantages derived by Defendants from their manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale, sale and/or otherwise dealing in the Counterfeit Products as

described herein, including prejudgment interest;

J. For an order from the Court that an asset freeze or constructive trust be imposed over any and all monies, profits, gains and advantages in Defendants' possession which rightfully belong to Plaintiffs;

K. For an award of exemplary or punitive damages in an amount to be determined by the Court;

L. For Plaintiffs' reasonable attorneys' fees;

M. For all costs of suit; and

N. For such other and further relief as the Court may deem just and equitable.

DEMAND FOR JURY TRIAL

Plaintiffs respectfully demand a trial by jury on all claims.

Dated: July 29, 2020

Respectfully submitted,

EPSTEIN DRANGEL LLP

BY: Danielle Yamali
Danielle S. Yamali (DY 4228)
dfutterman@ipcounselors.com
Jason M. Drangel (JD 7204)
jdrangel@ipcounselors.com
Ashly E. Sands (AS 7715)
asands@ipcounselors.com
Brienne Scully (BS 3711)
bscully@ipcounselors.com
60 East 42nd Street, Suite 2520
New York, NY 10165
Telephone: (212) 292-5390
Facsimile: (212) 292-5391
Attorneys for Plaintiffs
Palace Skateboards Group and
GSLT Holdings Limited

EXHIBIT A









EXHIBIT B



United States of America

United States Patent and Trademark Office

PALACE

Reg. No. 5,225,520

Registered Jun. 20, 2017

Int. Cl.: 18, 25, 28, 35

Service Mark

Trademark

Principal Register

Marshall Taylor (UNITED KINGDOM INDIVIDUAL)
77 Railway Arches,
Dunbridge Street London E2 6JG
UNITED KINGDOM

Levent James Tanju (UNITED KINGDOM INDIVIDUAL)
Jacks Place,
12 York Road London SW11 3QA
UNITED KINGDOM

Gareth Skewis (UNITED KINGDOM INDIVIDUAL)
13 Letchford Gardens
London NW10 6AD
UNITED KINGDOM

CLASS 18: Leather and imitations of leather; animal skins, hides; trunks and travelling bags; handbags, rucksacks, purses; umbrellas, parasols and walking sticks; whips, harness and saddlery; clothing for animals

CLASS 25: Clothing, namely, t-shirts, vests, jumpers, hooded sweatshirts, sweatshirts, sweaters, shorts, trousers, pants, swim trunks, swimsuits, wraps, cardigans, socks, lingerie, sleep shirts, nightwear, coats, jackets, mittens, gloves and scarves; footwear, headgear, namely, hats, caps, baseball caps, visors and headscarves

CLASS 28: Games, namely, card games, checkers games, board games, tabletop games, parlour games, horseshoe games, building games, backgammon games, chess games, dart games, memory games, dice games, pinball games, go games, manipulative games, target games, arcade games, party games, educational card games, marble games, trading card games, action target games, action skill games, basketball table top games, role playing games, ring games quoits, and paddle ball games; playthings, namely, beanbags in the form of playthings, puppet theatres, and toy glow sticks; playing cards; gymnastic and sporting articles in the nature of spring boards, golf ball dispensers, sleds, camouflage screens, weight lifting belts, men's athletic supporters, and protective supports for shoulders and elbows; decorations for Christmas trees; children's toy bicycles; skateboards; skateboard hardware being skateboard parts; skateboard parts; skateboard wax; skateboard wheels; skateboard rollers; bags for skateboards; athletic protective wrist, knee and elbow pads or guards for skateboarding

CLASS 35: business administration of consumer loyalty programs; auctioneering; retail clothing stores; retail sportswear and sporting goods stores; import-export agency services; online retail store services featuring clothing, sportswear, and sporting goods; online wholesale and retail store services featuring clothing, namely, t-shirts, vests, jumpers, hooded sweatshirts, sweaters, shorts, trousers, pants, swim trunks, swimsuits, wraps, cardigans, socks, lingerie, sleepshirts, nightwear, coats, jackets, mittens, gloves, scarves, footwear, headgear, namely, hats, caps, baseball caps, visors, and head scarves, sportswear, sporting articles, sporting apparatus and equipment including extreme sports apparatus and equipment, skateboards, skateboard hardware, skateboards parts, skateboard wax, skateboard wheels, skateboard rollers, bags for skateboards, protective pads and guards, athletic protective wrist,



Joseph Matal

Performing the Functions and Duties of the
Under Secretary of Commerce for
Intellectual Property and Director of the
United States Patent and Trademark Office

knee and elbow pads or guards for skateboarding, skateboard artwork graphic kits, protective clothing, protective gloves, protective headwear, skateboarding apparel, bags, jewellery, beer mats, stickers, key rings, key fobs, high visibility tapes and stickers, records, prints; retail on-line ordering services featuring clothing, namely, t-shirts, vests, jumpers, hooded sweatshirts, sweaters, shorts, trousers, pants, swim trunks, swimsuits, wraps, cardigans, socks, lingerie, sleepshirts, nightwear, coats, jackets, mittens, gloves, scarves, footwear, headgear, namely, hats, caps, baseball caps, visors, and head scarves, sportswear, sporting articles, sporting apparatus and equipment including extreme sports apparatus and equipment, skateboards, skateboard hardware, skateboards parts, skateboard wax, skateboard wheels, skateboard rollers, bags for skateboards, protective pads and guards, athletic protective wrist, knee and elbow pads or guards for skateboarding, skateboard artwork graphic kits, protective clothing, protective gloves, protective headwear, skateboarding apparel, bags, jewellery, beer mats, stickers, key rings, key fobs, high visibility tapes and stickers, records, prints also accessible by telephone, facsimile and mail order

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

PRIORITY DATE OF 03-04-2016 IS CLAIMED

OWNER OF INTERNATIONAL REGISTRATION 1322021 DATED 04-19-2016, EXPIRES 04-19-2026

SER. NO. 79-197,521, FILED 04-19-2016
JAMES B NEVILLE, EXAMINING ATTORNEY

REQUIREMENTS TO MAINTAIN YOUR FEDERAL TRADEMARK REGISTRATION

WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.

Requirements in the First Ten Years*

What and When to File:

- **First Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. See 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.
- **Second Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.* See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*

What and When to File:

- You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the United States Patent and Trademark Office (USPTO). The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at <http://www.uspto.gov>.

NOTE: A courtesy e-mail reminder of USPTO maintenance filing deadlines will be sent to trademark owners/holders who authorize e-mail communication and maintain a current e-mail address with the USPTO. To ensure that e-mail is authorized and your address is current, please use the Trademark Electronic Application System (TEAS) Correspondence Address and Change of Owner Address Forms available at <http://www.uspto.gov>.

United States of America

United States Patent and Trademark Office

PALACE SKATEBOARDS

Reg. No. 5,197,782

Registered May 09, 2017

Int. Cl.: 28, 35

Service Mark

Trademark

Principal Register

Marshall Taylor (UNITED KINGDOM INDIVIDUAL)
77 Railway Arches
Dunbridge Street
LONDON UNITED KINGDOM E2 6JG

Levent James Tanju (UNITED KINGDOM INDIVIDUAL)
Jacks Place
12 York Road
LONDON UNITED KINGDOM SW11 3QA

Gareth Skewis (UNITED KINGDOM INDIVIDUAL)
13 Letchford Gardens
LONDON UNITED KINGDOM NW10 6AD

CLASS 28: decorations for Christmas trees; skateboards; skateboard hardware, namely, ball bearings for skateboards and skateboard mounting hardware, namely, bolts, and lock nuts; skateboard parts, namely, skateboard decks, skateboard grip tapes, skateboard trucks, and skateboard risers; skateboard wax; skateboard wheels; skateboard rollers; bags for skateboards; sports articles, namely, athletic protective wrist, knee and elbow pads and guards for skateboarding

CLASS 35: Organization, operation and supervision of loyalty and incentive schemes, namely, administration of a customer loyalty program which provides incentive award programs for customers and employees through the distribution of prepaid stored value cards for the purpose of promoting and rewarding loyalty, incentive award programs through issuance and processing of loyalty points for purchase of a company's goods and services, and incentive award programs for customers through issuance and processing of loyalty points for on-line purchase of a company's goods and services; advice and assistance in the selection of goods and services, namely, providing consumer product information for the purpose of selecting skateboards, skateboard hardware, skateboard parts, and skateboard accessories; auctioneering; demonstration of goods; direct mail order retail services and online retail store services featuring sporting articles, sporting apparatus and equipment; goods import-export agencies; public opinion polling; retail and online sales promotion services; wholesale and retail store services featuring sporting equipment including spare parts thereof; retail store services featuring sporting goods, namely, sportswear, sporting articles, sporting apparatus and equipment including extreme sports apparatus and equipment; retail store services featuring skateboards, skateboard hardware, skateboard parts, skateboard wax, skateboard wheels, skateboard rollers, bags for skateboards, athletic protective wrist, knee and elbow pads or guards for skateboarding, skateboard artwork graphic kits including downloadable graphics, protective clothing, gloves and headgear, and skateboarding apparel; organization of trade fairs for commercial purposes; the bringing together, for the benefit of others of a variety of sporting articles, sporting apparatus, sporting equipment, skateboards, skateboard parts, protective pads and guards, bags and apparel, enabling customers to conveniently view and purchase those goods in wholesale or retail points, mail order, catalogue, via the Internet and/or a global computer and/or by means of a communications network; wholesale and retail store services featuring sporting articles, sporting apparatus, bags and apparel



Michelle K. Lee

Director of the United States
Patent and Trademark Office

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

OWNER OF INTERNATIONAL REGISTRATION 1224042 DATED 07-30-2014,

EXPIRES 07-30-2024

No claim is made to the exclusive right to use the following apart from the mark as shown:
"SKATEBOARDS"

SER. NO. 79-189,424, FILED 04-27-2016
CLARE GALLAGHE CAHILL, EXAMINING ATTORNEY



REQUIREMENTS TO MAINTAIN YOUR FEDERAL TRADEMARK REGISTRATION

WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.

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- **Second Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.* See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*

What and When to File:

- You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the United States Patent and Trademark Office (USPTO). The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

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United States of America

United States Patent and Trademark Office



Reg. No. 4,762,471
Registered June 30, 2015
Int. Cls.: 18, 25 and 28

TRADEMARK
PRINCIPAL REGISTER

GARETH SKEWIS (UNITED KINGDOM INDIVIDUAL)
13 LETCHFORD GARDENS
LONDON NW10 6AD
UNITED KINGDOM AND

LEVENT JAMES TANJU (UNITED KINGDOM INDIVIDUAL)
JACKS PLACE
12 YORK ROAD; LONDON SW11 3QA
UNITED KINGDOM AND

MARSHALL TAYLOR (UNITED KINGDOM INDIVIDUAL)
77 RAILWAY ARCHES
DUNBRIDGE STREET; LONDON E2 6JG
UNITED KINGDOM

FOR: LEATHER AND IMITATIONS OF LEATHER; ANIMAL SKINS, HIDES; TRUNKS AND TRAVELLING BAGS; HANDBAGS, RUCKSACKS, PURSES; UMBRELLAS, PARASOLS AND WALKING STICKS; WHIPS, HARNESS AND SADDLERY; CLOTHING FOR ANIMALS, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FOR: CLOTHING, NAMELY, T-SHIRTS, VESTS, JUMPERS, HOODED SWEATSHIRTS, SWEATSHIRTS, SWEATERS, SHORTS, TROUSERS, PANTS, SWIM TRUNKS, SWIMSUITS, WRAPS, CARDIGANS, SOCKS, LINGERIE, SLEEP SHIRTS, NIGHTWEAR, COATS, JACKETS, MITTENS, GLOVES, AND SCARVES; FOOTWEAR; HEADGEAR, NAMELY, HATS, CAPS, BASEBALL CAPS, VISORS, AND HEAD SCARVES, IN CLASS 25 (U.S. CLS. 22 AND 39).

FOR: PLAYING CARDS; SKATEBOARDS; LONGBOARD SKATEBOARDS; SKATEBOARD DECKS; SKATEBOARD TRUCKS; SKATEBOARD WHEELS; BALL BEARINGS FOR SKATEBOARDS; SKATEBOARD RISERS; SKATEBOARD GRIP TAPES; SKATEBOARD MOUNTING HARDWARE, NAMELY, BOLTS AND LOCK NUTS; SKATEBOARD WAX; SKATEBOARD BUSHINGS; BAGS FOR SKATEBOARDS; DECORATIONS FOR CHRISTMAS TREES, IN CLASS 28 (U.S. CLS. 22, 23, 38 AND 50).



Michelle K. Lee
Director of the United States
Patent and Trademark Office

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "SKATEBOARDS", APART FROM THE MARK AS SHOWN.

Reg. No. 4,762,471 OWNER OF INTERNATIONAL REGISTRATION 1213565 DATED 5-12-2014, EXPIRES 5-12-2024.

THE MARK CONSISTS OF THE WORDING "PALACE" APPEARING THREE TIMES WITHIN A TRIANGULAR DESIGN. BELOW IS THE WORDING "SKATEBOARDS".

SER. NO. 79-150,968, FILED 5-12-2014.

KAPIL BHANOT, EXAMINING ATTORNEY

 SellerDefense

**REQUIREMENTS TO MAINTAIN YOUR FEDERAL
TRADEMARK REGISTRATION**

**WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE
DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.**

Requirements in the First Ten Years*

What and When to File:

First Filing Deadline: You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. See 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.

Second Filing Deadline: You must file a Declaration of Use (or Excusable Nonuse) **and** an Application for Renewal between the 9th and 10th years after the registration date.* See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*

What and When to File:

You must file a Declaration of Use (or Excusable Nonuse) **and** an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the United States Patent and Trademark Office (USPTO). The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at <http://www.uspto.gov>.

NOTE: A courtesy e-mail reminder of USPTO maintenance filing deadlines will be sent to trademark owners/holders who authorize e-mail communication and maintain a current e-mail address with the USPTO. To ensure that e-mail is authorized and your address is current, please use the Trademark Electronic Application System (TEAS) Correspondence Address and Change of Owner Address Forms available at <http://www.uspto.gov>.

United States of America

United States Patent and Trademark Office



Reg. No. 6,055,982

Registered May 19, 2020

Int. Cl.: 25

Trademark

Principal Register

GSLT Holdings Limited (UNITED KINGDOM limited company (ltd.))
67/68 Hatton Garden, Suites 11/12
London, Ec1n 8jy, UNITED KINGDOM

CLASS 25: Baseball caps and hats; Caps being headwear; Cardigans; Coats; Footwear; Hats; Jumpers; Lingerie; Mittens; Nightwear; Pants; Scarfs; Shirts; Shorts; Sleep shirts; Socks; Sweaters; Sweatshirts; Swimsuits; Vests; Visors being headwear; Belts; Clothing wraps; Gloves as clothing; Head scarves; Headbands for clothing; Hoodies; Jackets; Jerseys; Swimming trunks; T-shirts

PRIORITY CLAIMED UNDER SEC. 44(D) ON UNITED KINGDOM APPLICATION NO. UK0000330123, FILED 04-03-2018, REG. NO. 3301230, DATED 11-01-2019, EXPIRES 04-03-2028

The mark consists of a triangular design wherein each of the three sides of the triangle is formed by the stylized wording "PALACE".

SER. NO. 87-864,331, FILED 04-05-2018



Andrei Iancu

Director of the United States
Patent and Trademark Office



REQUIREMENTS TO MAINTAIN YOUR FEDERAL TRADEMARK REGISTRATION

WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.

Requirements in the First Ten Years*

What and When to File:

- **First Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. See 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.
- **Second Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.* See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*

What and When to File:

- You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the United States Patent and Trademark Office (USPTO). The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at <http://www.uspto.gov>.

NOTE: A courtesy e-mail reminder of USPTO maintenance filing deadlines will be sent to trademark owners/holders who authorize e-mail communication and maintain a current e-mail address with the USPTO. To ensure that e-mail is authorized and your address is current, please use the Trademark Electronic Application System (TEAS) Correspondence Address and Change of Owner Address Forms available at <http://www.uspto.gov>.

United States of America

United States Patent and Trademark Office



Reg. No. 5,711,377

Registered Mar. 26, 2019

Int. Cl.: 25

Trademark

Principal Register

GSLT Holdings Limited (UNITED KINGDOM limited company (ltd.))
67/68 Hatton Garden, Suites 11/12
London, UNITED KINGDOM EC1N8JY

CLASS 25: Baseball caps and hats; Caps being headwear; Cardigans; Coats; Footwear; Hats; Pants; Shirts; Shorts; Socks; Sweaters; Sweatshirts; Vests; Visors being headwear; Belts; Hoodies; Jackets; Jerseys; T-shirts

FIRST USE 2-00-2014; IN COMMERCE 2-00-2014

The mark consists of the wording "PALACE" appearing three times within a triangular design.

SER. NO. 87-864,318, FILED 04-05-2018



Andrei Iancu

Director of the United States
Patent and Trademark Office

REQUIREMENTS TO MAINTAIN YOUR FEDERAL TRADEMARK REGISTRATION

WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.

Requirements in the First Ten Years*

What and When to File:

- **First Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. See 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.
- **Second Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.* See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*

What and When to File:

- You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

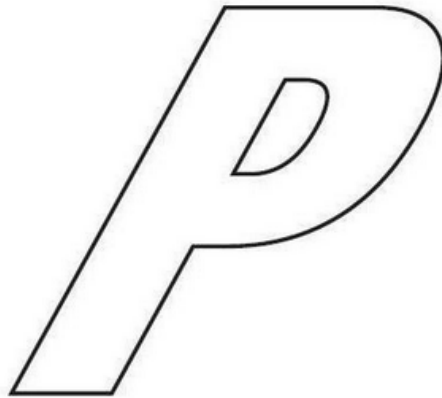
***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the United States Patent and Trademark Office (USPTO). The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

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United States of America

United States Patent and Trademark Office



Reg. No. 5,220,519

Registered Jun. 13, 2017

Int. Cl.: 18, 25, 28, 35

Service Mark

Trademark

Principal Register

Marshall Taylor (UNITED KINGDOM INDIVIDUAL)
77 Railway Arches
Dunbridge Street London E2 6JG
UNITED KINGDOM

Levent James Tanju (UNITED KINGDOM INDIVIDUAL)
Jacks Place
12 York Road London SW11 3QA
UNITED KINGDOM

Gareth Skewis (UNITED KINGDOM INDIVIDUAL)
13 Letchford Gardens
London NW10 6AD
UNITED KINGDOM

CLASS 18: Leather and imitations of leather; animal skins and hides; trunks and travelling bags; handbags, rucksacks, purses; umbrellas, parasols and walking sticks; whips, harnesses and saddlery; clothing for animals

CLASS 25: Clothing, namely, t-shirts, vests, jumpers, hooded sweatshirts, sweatshirts, sweaters, shorts, trousers, pants, swim trunks, swimsuits, wraps, cardigans, socks, lingerie, sleep shirts, nightwear, coats, jackets, mittens, gloves, and scarves; footwear; headgear, namely, hats, caps, baseball caps, visors, and head scarves

CLASS 28: Games, namely, card games, checkers games, board games, tabletop games, parlour games, horseshoe games, building games, backgammon games, chess games, dart games, memory games, dice games, pinball games, go games, manipulative games, target games, arcade games, party games, educational card games, marble games, trading card games, action target games, action skill games, basketball table top games, role playing games, ring games, and paddle ball games; playthings, namely, beanbags in the form of playthings, puppet theatres, and toy glow sticks; playing cards; gymnastic and sporting articles in the nature of spring boards, golf ball dispensers, sleds, camouflage screens, weight lifting belts, men's athletic supporters, protective supports for shoulders and elbows; decorations for Christmas trees; children's toy bicycles other than for transport; skateboards; skateboard hardware, namely, bolts and lock nuts, ball bearings for skateboards, skateboard bushings, and skateboard risers pads; skateboard parts, namely, skateboard grip tapes, skateboard decks, and skateboard trucks; skateboard wax; skateboard wheels; skateboard rollers; bags for skateboards; sports articles in the nature of athletic protective wrist, knee and



Joseph Matal

Performing the Functions and Duties of the
Under Secretary of Commerce for
Intellectual Property and Director of the
United States Patent and Trademark Office

elbow pads or guards for skateboarding

CLASS 35: Business administration of consumer loyalty programs; customer loyalty services and customer club services, for commercial, promotional and advertising purposes; franchising, namely, consultation and assistance in business management, organisation and promotion; internet advertising services; auctioneering; commercial business management; demonstration of goods; retail clothing stores; retail sportswear and sporting goods stores; import-export agency services; online retail store services featuring clothing, sportswear, and sporting goods; online wholesale and retail store services featuring clothing, namely, t-shirts, vests, jumpers, hooded sweatshirts, sweaters, shorts, trousers, pants, swim trunks, swimsuits, wraps, cardigans, socks, lingerie, sleep shirts, nightwear, coats, jackets, mittens, gloves, scarves, footwear, headgear, namely, hats, caps, baseball caps, visors, and head scarves, sportswear, sporting articles, sporting apparatus and equipment, particularly, extreme sports apparatus and equipment, skateboards, skateboard hardware, skateboards parts, skateboard wax, skateboard wheels, skateboard rollers, bags for skateboards, protective pads and guards, sporting articles in the nature of athletic protective wrist, knee and elbow pads or guards for skateboarding, skateboard artwork graphic kits, protective clothing, protective gloves, protective headwear, skateboarding apparel, bags, jewellery, beer mats, stickers, key rings, key fobs, high visibility tapes and stickers, records, prints; retail on-line ordering services featuring clothing, namely, t-shirts, vests, jumpers, hooded sweatshirts, sweaters, shorts, trousers, pants, swim trunks, swimsuits, wraps, cardigans, socks, lingerie, sleep shirts, nightwear, coats, jackets, mittens, gloves, scarves, footwear, headgear, namely, hats, caps, baseball caps, visors, and head scarves, sportswear, sporting articles, sporting apparatus and equipment, particularly, extreme sports apparatus and equipment, skateboards, skateboard hardware, skateboards parts, skateboard wax, skateboard wheels, skateboard rollers, bags for skateboards, protective pads and guards, sporting articles in the nature of athletic protective wrist, knee and elbow pads or guards for skateboarding, skateboard artwork graphic kits, protective clothing, protective gloves, protective headware, skateboarding apparel, bags, jewellery, beer mats, stickers, key rings, key fobs, high visibility tapes and stickers, records, prints also accessible by telephone, facsimile and mail order

The mark consists of the letter "P" in stylized form.

PRIORITY DATE OF 04-27-2016 IS CLAIMED

OWNER OF INTERNATIONAL REGISTRATION 1321763 DATED 04-27-2016,
EXPIRES 04-27-2026

SER. NO. 79-197,397, FILED 04-27-2016
CHRISTINA DE CALLOWAY, EXAMINING ATTORNEY

REQUIREMENTS TO MAINTAIN YOUR FEDERAL TRADEMARK REGISTRATION

WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.

Requirements in the First Ten Years*

What and When to File:

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- **Second Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.* See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*

What and When to File:

- You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

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Trademark/Service Mark Application, Principal Register

Serial Number: 88500470

Filing Date: 07/03/2019

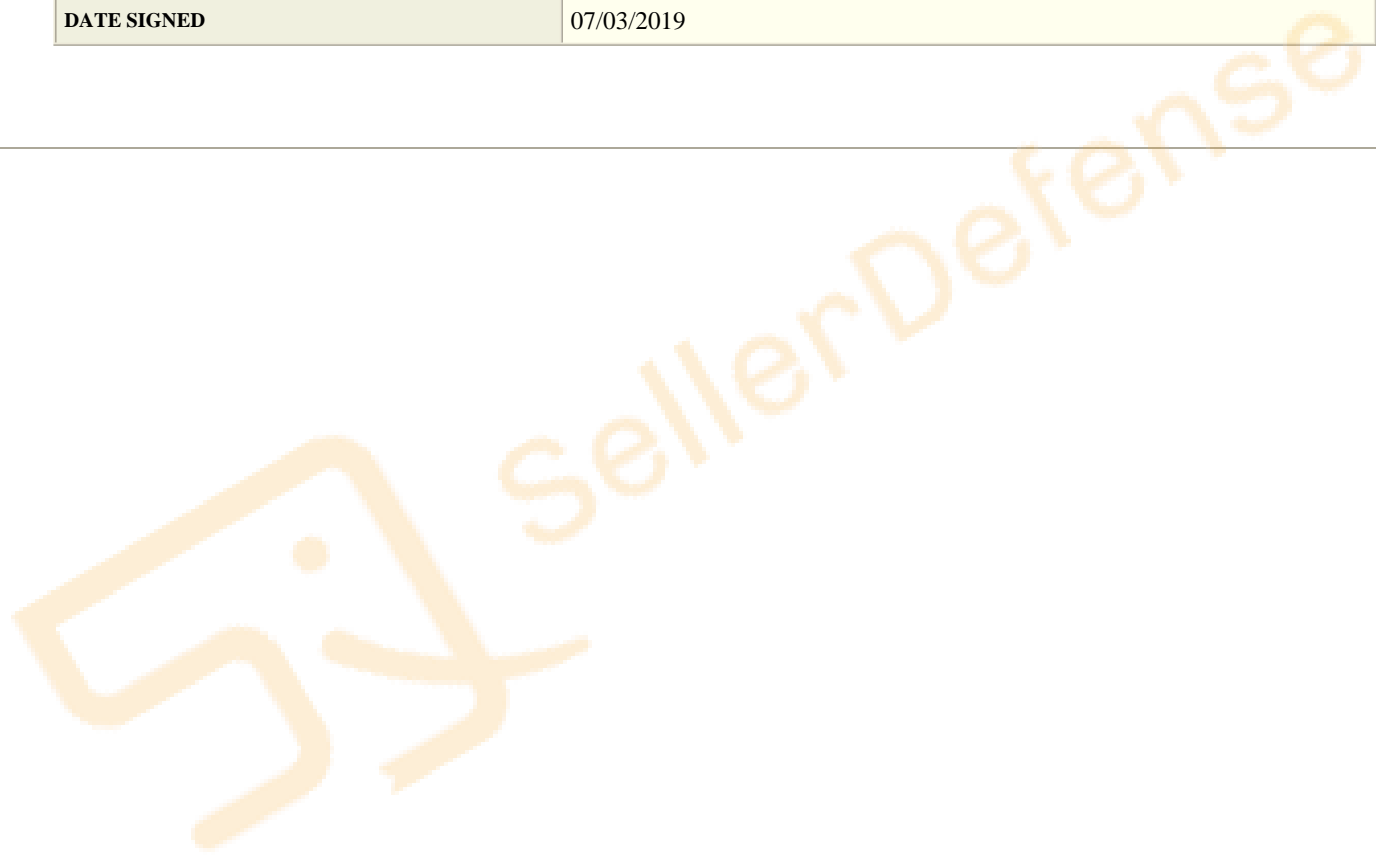
The table below presents the data as entered.

Input Field	Entered
SERIAL NUMBER	88500470
MARK INFORMATION	
*MARK	PALACE
STANDARD CHARACTERS	YES
USPTO-GENERATED IMAGE	YES
LITERAL ELEMENT	PALACE
MARK STATEMENT	The mark consists of standard characters, without claim to any particular font style, size, or color.
REGISTER	Principal
APPLICANT INFORMATION	
*OWNER OF MARK	GSLT Holdings Limited
*STREET	67/68 Hatton Garden, Suites 11/12
*CITY	London
*COUNTRY	United Kingdom
*ZIP/POSTAL CODE (Required for U.S. and certain international addresses)	EC1N8JY
LEGAL ENTITY INFORMATION	
TYPE	limited company (Ltd.)
STATE/COUNTRY WHERE LEGALLY ORGANIZED	United Kingdom
GOODS AND/OR SERVICES AND BASIS INFORMATION	
INTERNATIONAL CLASS	035
*IDENTIFICATION	Advertising; marketing and promotional services; business consultancy; brand strategy, creation and advisory services; branding consultancy services; brand testing; market campaigns; development of advertising and promotional campaigns; production of commercials, advertising and online, television, cinema and radio commercials; production of video and sound recordings for marketing, advertising and publicity purposes; business research; provision of business information, data, analysis, advice and comment; producing reports relating to business information, business data and business forecasts, marketing and advertising, branding, design, product design, media advertising campaigns, sponsorship, PR, events, retail initiatives, the internet, market trends and market analysis; information, advisory and consultancy services relating to all the aforesaid services
FILING BASIS	SECTION 1(b)

FILING BASIS	SECTION 44(d)
FOREIGN APPLICATION NUMBER	018090088
FOREIGN APPLICATION COUNTRY	European Union Trademark - EUTM
FOREIGN FILING DATE	07/02/2019
INTENT TO PERFECT 44(d)	At this time, the applicant intends to rely on Section 44(e) as a basis for registration and requests that the application be suspended to await the submission of the foreign registration. If ultimately the applicant does not rely on §44(e) as a basis for registration, a valid claim of priority may be retained.
FILING BASIS	SECTION 44(e)
FOREIGN REGISTRATION NUMBER	1322021
FOREIGN REGISTRATION COUNTRY	European Union Trademark - EUTM
FOREIGN REGISTRATION DATE	04/19/2016
FOREIGN REGISTRATION EXPIRATION DATE	04/19/2026
FOREIGN REGISTRATION FILE NAME(S)	
ORIGINAL PDF FILE	reg-38100144103-211832728 . EU_1322021_190702_RGP16311EM.PDF
CONVERTED PDF FILE(S) (4 pages)	\\TICRS\EXPORT17\IMAGEOUT17\885\004\88500470\xml1\RFA0003.JPG
	\\TICRS\EXPORT17\IMAGEOUT17\885\004\88500470\xml1\RFA0004.JPG
	\\TICRS\EXPORT17\IMAGEOUT17\885\004\88500470\xml1\RFA0005.JPG
	\\TICRS\EXPORT17\IMAGEOUT17\885\004\88500470\xml1\RFA0006.JPG
STANDARD CHARACTERS OR EQUIVALENT	YES
INTERNATIONAL CLASS	041
*IDENTIFICATION	Entertainment; providing of training; training in relation to advertising and marketing; organisation of gaming and sporting events and competitions; presentation of live performances; production of radio and television programmes; audio and video recording services in the nature of production of pre-recorded video tapes, pre-recorded compact discs and pre-optical discs; publication of printed and online content; information, advisory and consultancy services relating to all the aforesaid services
FILING BASIS	SECTION 1(b)
FILING BASIS	SECTION 44(d)
FOREIGN APPLICATION NUMBER	018090088
FOREIGN APPLICATION COUNTRY	European Union Trademark - EUTM
FOREIGN FILING DATE	07/02/2019
INTENT TO PERFECT 44(d)	At this time, the applicant intends to rely on Section 44(e) as a basis for registration and requests that the application be suspended to await the submission of the foreign registration. If ultimately the applicant does not rely on §44(e) as a basis for registration, a valid claim of priority may be retained.
ATTORNEY INFORMATION	
NAME	Matthew A. Homyk

ATTORNEY DOCKET NUMBER	145135-00119
FIRM NAME	Blank Rome LLP
STREET	One Logan Square
CITY	Philadelphia
STATE	Pennsylvania
COUNTRY	United States
ZIP/POSTAL CODE	19103
PHONE	215-569-5360
FAX	215-832-5360
EMAIL ADDRESS	mhomyk@blankrome.com
AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
OTHER APPOINTED ATTORNEY	Timothy D. Pecsénye, David M. Perry, Bruce D. George, Lisa Casey Spaniel, Megan E. Spitz, Zachary A. Aria, John Sullivan, Bradford Craig, Shaun J. Bockert, Thomas H. Kelly, Samar Aryani-Sabet, Blake Fink
DOMESTIC REPRESENTATIVE INFORMATION	
NAME	Matthew A. Homyk
FIRM NAME	Blank Rome LLP
STREET	One Logan Square
CITY	Philadelphia
STATE	Pennsylvania
COUNTRY	United States
ZIP CODE	19103
PHONE	215-569-5360
FAX	215-832-5360
EMAIL ADDRESS	mhomyk@blankrome.com
AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
CORRESPONDENCE INFORMATION	
NAME	Matthew A. Homyk
FIRM NAME	Blank Rome LLP
STREET	One Logan Square
CITY	Philadelphia
STATE	Pennsylvania
COUNTRY	United States
ZIP/POSTAL CODE	19103
PHONE	215-569-5360
FAX	215-832-5360
*EMAIL ADDRESS	mhomyk@blankrome.com
*AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes

FEE INFORMATION	
APPLICATION FILING OPTION	TEAS RF
NUMBER OF CLASSES	2
APPLICATION FOR REGISTRATION PER CLASS	275
*TOTAL FEE DUE	550
*TOTAL FEE PAID	550
SIGNATURE INFORMATION	
SIGNATURE	/matthew homyk/
SIGNATORY'S NAME	Matthew A. Homyk
SIGNATORY'S POSITION	Attorney of record, Pennsylvania bar member
SIGNATORY'S PHONE NUMBER	215-569-5360
DATE SIGNED	07/03/2019



Trademark/Service Mark Application, Principal Register

Serial Number: 88500470

Filing Date: 07/03/2019

To the Commissioner for Trademarks:

MARK: PALACE (Standard Characters, see [mark](#))

The literal element of the mark consists of PALACE.

The mark consists of standard characters, without claim to any particular font style, size, or color.

The applicant, GSLT Holdings Limited, a limited company (Ltd.) legally organized under the laws of United Kingdom, having an address of
67/68 Hatton Garden, Suites 11/12
London EC1N8JY
United Kingdom

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

International Class 035: Advertising; marketing and promotional services; business consultancy; brand strategy, creation and advisory services; branding consultancy services; brand testing; market campaigns; development of advertising and promotional campaigns; production of commercials, advertising and online, television, cinema and radio commercials; production of video and sound recordings for marketing, advertising and publicity purposes; business research; provision of business information, data, analysis, advice and comment; producing reports relating to business information, business data and business forecasts, marketing and advertising, branding, design, product design, media advertising campaigns, sponsorship, PR, events, retail initiatives, the internet, market trends and market analysis; information, advisory and consultancy services relating to all the aforesaid services

Intent to Use: The applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the identified goods/services.

Priority based on foreign filing: The applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the identified goods/services and asserts a claim of priority based on European Union Trademark - EUTM application number 018090088, filed 07/02/2019.

INTENT TO PERFECT 44(d) : At this time, the applicant intends to rely on Section 44(e) as a basis for registration and requests that the application be suspended to await the submission of the foreign registration. If ultimately the applicant does not rely on §44(e) as a basis for registration, a valid claim of priority may be retained.

Based on Foreign Registration: The applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the identified goods/services, and submits a copy of European Union Trademark - EUTM registration number 1322021, and/or proof of renewal, registered 04/19/2016 with a renewal date of _____ and an expiration date of 04/19/2026, and translation thereof, if appropriate.

Original PDF file:

[reg-38100144103-211832728 . EU_1322021_190702_RGP16311EM.PDF](#)

Converted PDF file(s) (4 pages)

[Foreign Registration-1](#)

[Foreign Registration-2](#)

[Foreign Registration-3](#)

[Foreign Registration-4](#)

The foreign registration that is the basis of the U.S. application under §44(e) of the Trademark Act includes a claim of standard characters or the country of origin's standard character equivalent.

International Class 041: Entertainment; providing of training; training in relation to advertising and marketing; organisation of gaming and sporting events and competitions; presentation of live performances; production of radio and television programmes; audio and video recording services in the nature of production of pre-recorded video tapes, pre-recorded compact discs and pre-optical discs; publication of printed and online content; information, advisory and consultancy services relating to all the aforesaid services

Intent to Use: The applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the identified

goods/services.

Priority based on foreign filing: The applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the identified goods/services and asserts a claim of priority based on European Union Trademark - EUTM application number 018090088, filed 07/02/2019.

INTENT TO PERFECT 44(d) : At this time, the applicant intends to rely on Section 44(e) as a basis for registration and requests that the application be suspended to await the submission of the foreign registration. If ultimately the applicant does not rely on §44(e) as a basis for registration, a valid claim of priority may be retained.

The applicant's current Attorney Information:

Matthew A. Homyk and Timothy D. Pecsénye, David M. Perry, Bruce D. George, Lisa Casey Spaniel, Megan E. Spitz, Zachary A. Aria, John Sullivan, Bradford Craig, Shaun J. Bockert, Thomas H. Kelly, Samar Aryani-Sabet, Blake Fink of Blank Rome LLP One Logan Square Philadelphia, Pennsylvania 19103

United States

215-569-5360(phone)

215-832-5360(fax)

mhomyk@blankrome.com (authorized)

The attorney docket/reference number is 145135-00119.

The applicant hereby appoints Matthew A. Homyk of Blank Rome LLP

One Logan Square

Philadelphia Pennsylvania 19103

United States

215-569-5360(phone)

215-832-5360(fax)

mhomyk@blankrome.com (authorized)

as applicant's representative upon whom notice or process in the proceedings affecting the mark may be served.

The applicant's current Correspondence Information:

Matthew A. Homyk

Blank Rome LLP

One Logan Square

Philadelphia, Pennsylvania 19103

215-569-5360(phone)

215-832-5360(fax)

mhomyk@blankrome.com (authorized)

E-mail Authorization: I authorize the USPTO to send e-mail correspondence concerning the application to the applicant, the applicant's attorney, or the applicant's domestic representative at the e-mail address provided in this application. I understand that a valid e-mail address must be maintained and that the applicant or the applicant's attorney must file the relevant subsequent application-related submissions via the Trademark Electronic Application System (TEAS). Failure to do so will result in the loss of TEAS Reduced Fee status and a requirement to submit an additional processing fee of \$125 per international class of goods/services.

A fee payment in the amount of \$550 has been submitted with the application, representing payment for 2 class(es).

Declaration

Basis:

If the applicant is filing the application based on use in commerce under 15 U.S.C. § 1051(a):

- The signatory believes that the applicant is the owner of the trademark/service mark sought to be registered;
- The mark is in use in commerce on or in connection with the goods/services in the application;
- The specimen(s) shows the mark as used on or in connection with the goods/services in the application; and
- To the best of the signatory's knowledge and belief, the facts recited in the application are accurate.

And/Or

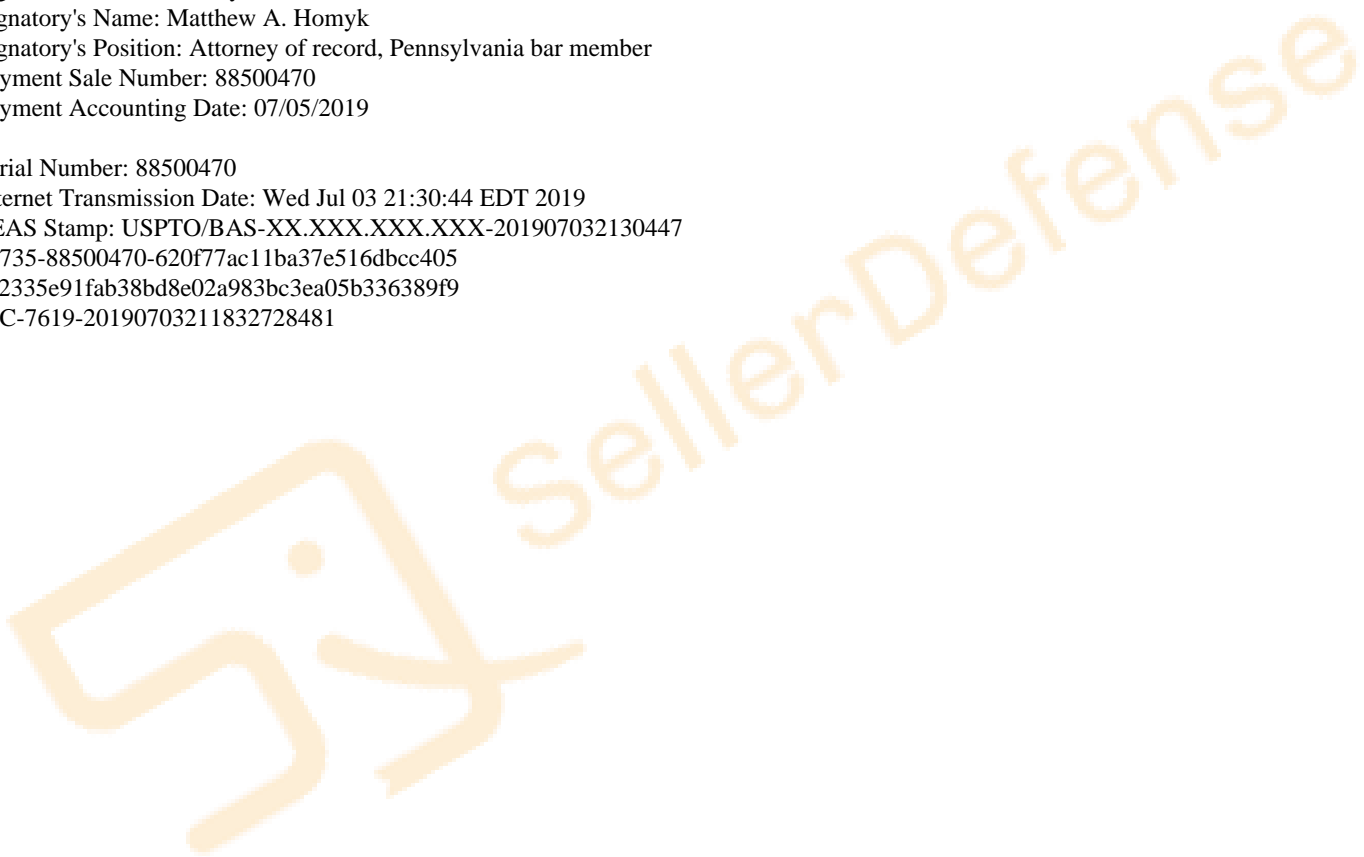
If the applicant is filing the application based on an intent to use the mark in commerce under 15 U.S.C. § 1051(b), § 1126(d), and/or § 1126(e):

- The signatory believes that the applicant is entitled to use the mark in commerce;
 - The applicant has a bona fide intention to use the mark in commerce on or in connection with the goods/services in the application; and
 - To the best of the signatory's knowledge and belief, the facts recited in the application are accurate.
- To the best of the signatory's knowledge and belief, no other persons, except, if applicable, concurrent users, have the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other persons, to cause confusion or mistake, or to deceive.
- To the best of the signatory's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances, the allegations and other factual contentions made above have evidentiary support.
- The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001, and that such willful false statements and the like may jeopardize the validity of the application or submission or any registration resulting therefrom, declares that all statements made of his/her own knowledge are true and all statements made on information and belief are believed to be true.

Declaration Signature

Signature: /matthew homyk/ Date: 07/03/2019
Signatory's Name: Matthew A. Homyk
Signatory's Position: Attorney of record, Pennsylvania bar member
Payment Sale Number: 88500470
Payment Accounting Date: 07/05/2019

Serial Number: 88500470
Internet Transmission Date: Wed Jul 03 21:30:44 EDT 2019
TEAS Stamp: USPTO/BAS-XX.XXX.XXX.XXX-201907032130447
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PALACE





Protect your intellectual property in the European Union

EUTM file information

PALACE

1322021

Timeline



Trade mark information

Name	PALACE	Filing date	
Filing number	1322021	Registration date	19/04/2016
Basis	IR (Search on WIPO database)	Expiry date	19/04/2026
		Renewal date	19/04/2026

Date of receipt	08/12/2016	Designation date	19/04/2016
Type	Word	Filing language	English
Nature	Individual	Second language	Italian
Nice classes	18, 25, 28, 35 (Nice Classification)	Application reference	
Vienna Classification		Trade mark status	IR accepted
		Acquired distinctiveness	No

Goods and services

English (en)

18 Leather and imitations of leather; animal skins, hides; trunks and travelling bags; handbags, rucksacks, purses; umbrellas, parasols and walking sticks; whips, harness and saddlery; clothing for animals.

25 Clothing, footwear, headgear.

28 Games and playthings; playing cards; gymnastic and sporting articles; decorations for Christmas trees; children's toy bicycles; skateboards; skateboard hardware being skateboard parts; skateboard parts; skateboard wax; skateboard wheels; skateboard rollers; bags for skateboards; athletic protective wrist, knee and elbow pads or guards (sports articles) for skateboarding.

35 Advertising, marketing and promotional services; business management; business administration; office functions; organisation, operation and supervision of loyalty and incentive schemes; administration of the business affairs of franchises; advertising services provided via the Internet; advice and assistance in the selection of goods and services; advisory services (-business) relating to the establishment and operation of franchises; auctioneering; business information services; business services; data processing; demonstration of goods; direct mail order retail services and online retail services connected with sporting articles, sporting apparatus and equipment; direct mail marketing; email marketing services; import-export agencies; business intermediary services relating to bringing customers and/or buyers and sellers together; management of retail and wholesale enterprises; opinion polling; production of television and radio advertisements; provision of business information; rental of advertising space; retail and online marketing and sales promotions; wholesale and retail services connected with the sale of sporting equipment including spare parts thereof; retail store services connected with the sale of sporting goods, namely sportswear, sporting articles, sporting apparatus and equipment including extreme sports apparatus and equipment; retail store services connected with the sale of skateboards, skateboard hardware, skateboard parts, skateboard wax, skateboard wheels, skateboard rollers, bags for

skateboards, athletic protective wrist, knee and elbow pads or guards (sports articles) for skateboarding, skateboard artwork graphic kits (including downloadable graphics), protective clothing, gloves and headgear, and skateboarding apparel; trade fairs; the bringing together, for the benefit of others of a variety of sporting articles, sporting apparatus, sporting equipment, skateboards, skateboard parts, protective pads and guards, bags and apparel, badges, jewellery, beer mats, stickers, key rings, key fobs, high visibility tapes and stickers, records, prints, enabling customers to conveniently view and purchase those goods in wholesale or retail points, mail order, catalogue, via the Internet and/or a global computer and/or by means of a communications network; wholesale and retail services connected with sporting articles, sporting apparatus, bags and apparel; information, advisory and consultancy services relating to the aforesaid.

Description

No data

Owners

GSLT HOLDINGS LIMITED

ID	n/a	Country	GB - United Kingdom	Hidden. You can set your contact details to be publicly available via the User Area.
Organisation	n/a	State/county	n/a	
Legal status	UK Limited Company	Town	n/a	
		Post code	n/a	Hidden. You can set your contact details to be publicly available via the User Area.
		Address	67/68 Hatton Garden, Suites 11/12 London, EC1N 8JY	Hidden. You can set your contact details to be publicly available via the User Area.

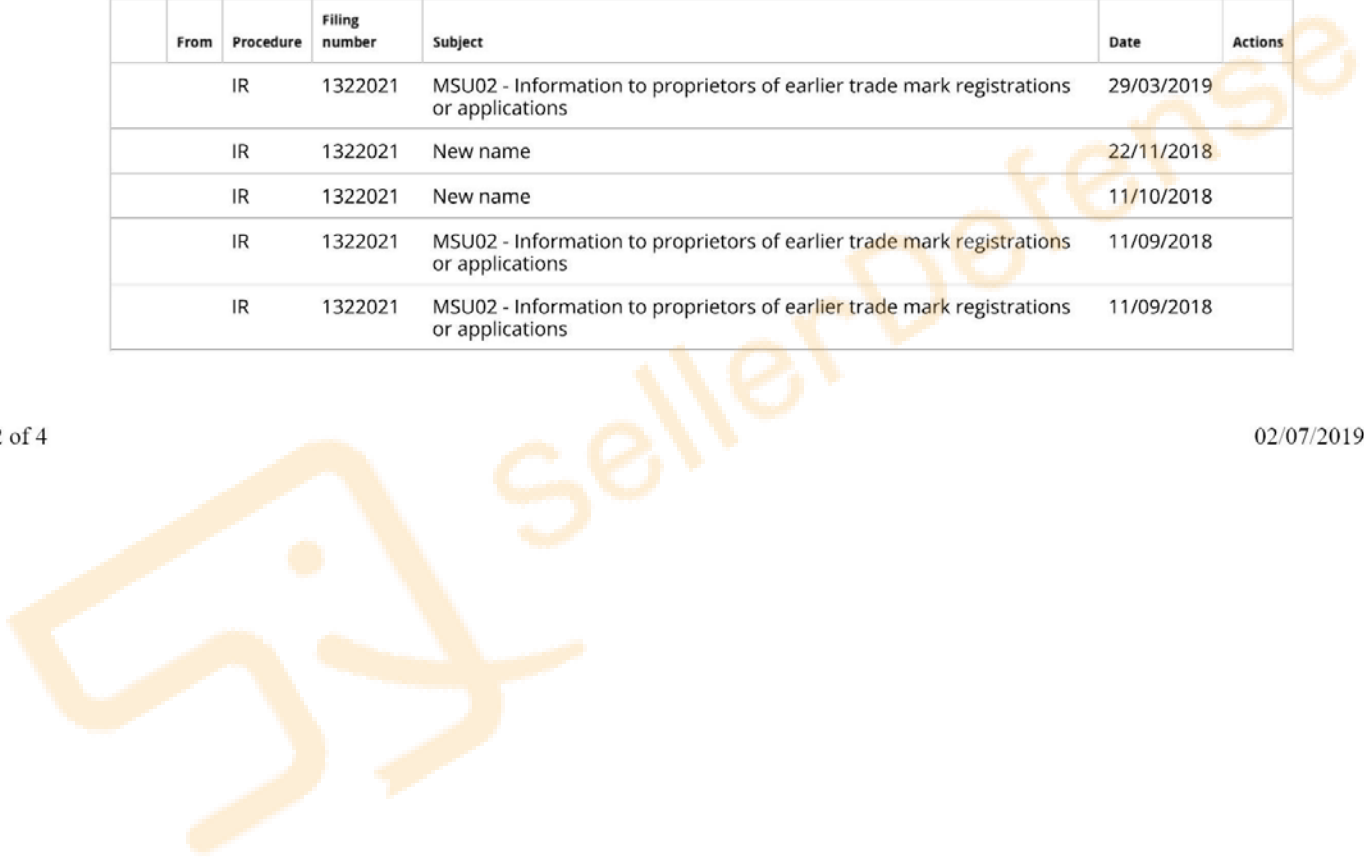
Representatives

GILL JENNINGS & EVERY LLP

ID	10131	Country	GB - United Kingdom	Correspondence address	00 44-2076558500
Organisation	n/a	State/county	n/a	GILL JENNINGS & EVERY LLP	
Legal status	Legal person	Town	London	The Broadgate Tower	00 44-2076558501
Type	Association	Post code	EC2A 2ES	20 Primrose Street	
		Address	The Broadgate Tower 20 Primrose Street	REINO UNIDO	tmrecs@gje.com

Correspondence

	From	Procedure	Filing number	Subject	Date	Actions
		IR	1322021	MSU02 - Information to proprietors of earlier trade mark registrations or applications	29/03/2019	
		IR	1322021	New name	22/11/2018	
		IR	1322021	New name	11/10/2018	
		IR	1322021	MSU02 - Information to proprietors of earlier trade mark registrations or applications	11/09/2018	
		IR	1322021	MSU02 - Information to proprietors of earlier trade mark registrations or applications	11/09/2018	



	From	Procedure	Filing number	Subject	Date	Actions
	IR		1322021	MPER1 - Notification of the entry / deletion of a representative in the EUIPO database	17/08/2018	
	IR		1322021	Application form and attachment	16/08/2018	
	IR		1322021	MSU02 - Information to proprietors of earlier trade mark registrations or applications	13/07/2018	
	IR		1322021	New name	29/03/2018	
	IR		1322021	MSU02 - Information to proprietors of earlier trade mark registrations or applications	29/01/2018	
Showing 1 to 10 of 23 entries						

IR transformation

No data

Seniority

No data

Exhibition priority

No data

Priority

Country	Filing number	Date	Status
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United Kingdom	UK00003153124	04/03/2016	Accepted
Showing 1 to 1 of 1 entries			

Publications

Bulletin number	Date	Section	Description
2016/234	09/12/2016	M.1	IR_M_1
2017/087	11/05/2017	M.3.1	IR_M_3_1
Showing 1 to 2 of 2 entries			

Cancellation

No data

Recordals

No data

Oppositions

No data



Appeals

No data

Decisions

No data

Renewals

No data

Trade mark relations

No data



 SellerDefense

Trademark/Service Mark Application, Principal Register

Serial Number: 88500458

Filing Date: 07/03/2019

The table below presents the data as entered.

Input Field	Entered
SERIAL NUMBER	88500458
MARK INFORMATION	
*MARK	\\TICRS\EXPORT17\IMAGEOUT17\885\004\88500458\xml1\ RFA0002.JPG
SPECIAL FORM	YES
USPTO-GENERATED IMAGE	NO
LITERAL ELEMENT	PALACE PALACE PALACE
COLOR MARK	NO
*DESCRIPTION OF THE MARK (and Color Location, if applicable)	The mark consists of the wording "PALACE" appearing three times within a triangular design.
PIXEL COUNT ACCEPTABLE	NO
PIXEL COUNT	1205 x 1049
REGISTER	Principal
APPLICANT INFORMATION	
*OWNER OF MARK	GSLT Holdings Limited
*STREET	67/68 Hatton Garden, Suites 11/12
*CITY	London
*COUNTRY	United Kingdom
*ZIP/POSTAL CODE (Required for U.S. and certain international addresses)	EC1N8JY
LEGAL ENTITY INFORMATION	
TYPE	limited company (ltd.)
STATE/COUNTRY WHERE LEGALLY ORGANIZED	United Kingdom
GOODS AND/OR SERVICES AND BASIS INFORMATION	
INTERNATIONAL CLASS	035
*IDENTIFICATION	Advertising; marketing and promotional services; business consultancy; brand strategy, creation and advisory services; branding consultancy services; brand testing; market campaigns; development of advertising and promotional campaigns; production of commercials, advertising and online, television, cinema and radio commercials; production of video and sound recordings for marketing, advertising and publicity purposes; business research; provision of business information, data, analysis, advice and comment; producing reports relating

	to business information, business data and business forecasts, marketing and advertising, branding, design, product design, media advertising campaigns, sponsorship, PR, events, retail initiatives, the internet, market trends and market analysis; information, advisory and consultancy services relating to all the aforesaid services
FILING BASIS	SECTION 1(b)
FILING BASIS	SECTION 44(d)
FOREIGN APPLICATION NUMBER	018090089
FOREIGN APPLICATION COUNTRY	European Union Trademark - EUTM
FOREIGN FILING DATE	07/02/2019
INTENT TO PERFECT 44(d)	At this time, the applicant intends to rely on Section 44(e) as a basis for registration and requests that the application be suspended to await the submission of the foreign registration. If ultimately the applicant does not rely on §44(e) as a basis for registration, a valid claim of priority may be retained.
INTERNATIONAL CLASS	041
*IDENTIFICATION	Entertainment; providing of training; training in relation to advertising and marketing; organisation of gaming and sporting events and competitions; presentation of live performances; production of radio and television programmes; audio and video recording services in the nature of production of pre-recorded video tapes, pre-recorded compact discs and pre-optical discs; publication of printed and online content; information, advisory and consultancy services relating to all the aforesaid services
FILING BASIS	SECTION 1(b)
FILING BASIS	SECTION 44(d)
FOREIGN APPLICATION NUMBER	018090089
FOREIGN APPLICATION COUNTRY	European Union Trademark - EUTM
FOREIGN FILING DATE	07/02/2019
INTENT TO PERFECT 44(d)	At this time, the applicant intends to rely on Section 44(e) as a basis for registration and requests that the application be suspended to await the submission of the foreign registration. If ultimately the applicant does not rely on §44(e) as a basis for registration, a valid claim of priority may be retained.
ATTORNEY INFORMATION	
NAME	Matthew A. Homyk
ATTORNEY DOCKET NUMBER	145135-00118
FIRM NAME	Blank Rome LLP
STREET	One Logan Square
CITY	Philadelphia
STATE	Pennsylvania
COUNTRY	United States
ZIP/POSTAL CODE	19103

PHONE	215-569-5360
FAX	215-832-5360
EMAIL ADDRESS	mhomyk@blankrome.com
AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
OTHER APPOINTED ATTORNEY	Timothy D. Pecsénye, David M. Perry, Bruce D. George, Lisa Casey Spaniel, Megan E. Spitz, Zachary A. Aria, John Sullivan, Bradford Craig, Shaun J. Bockert, Thomas H. Kelly, Samar Aryani-Sabet, Blake Fink
DOMESTIC REPRESENTATIVE INFORMATION	
NAME	Matthew A. Homyk
FIRM NAME	Blank Rome LLP
STREET	One Logan Square
CITY	Philadelphia
STATE	Pennsylvania
COUNTRY	United States
ZIP CODE	19103
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AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
CORRESPONDENCE INFORMATION	
NAME	Matthew A. Homyk
FIRM NAME	Blank Rome LLP
STREET	One Logan Square
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FAX	215-832-5360
*EMAIL ADDRESS	mhomyk@blankrome.com
*AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
FEE INFORMATION	
APPLICATION FILING OPTION	TEAS RF
NUMBER OF CLASSES	2
APPLICATION FOR REGISTRATION PER CLASS	275
*TOTAL FEE DUE	550
*TOTAL FEE PAID	550
SIGNATURE INFORMATION	

SIGNATURE	/matthew homyk/
SIGNATORY'S NAME	Matthew A. Homyk
SIGNATORY'S POSITION	Attorney of record, Pennsylvania bar member
SIGNATORY'S PHONE NUMBER	215-569-5360
DATE SIGNED	07/03/2019



Trademark/Service Mark Application, Principal Register

Serial Number: 88500458

Filing Date: 07/03/2019

To the Commissioner for Trademarks:

MARK: PALACE PALACE PALACE (stylized and/or with design, see [mark](#))

The literal element of the mark consists of PALACE PALACE PALACE.

The mark consists of the wording "PALACE" appearing three times within a triangular design.

The applicant, GSLT Holdings Limited, a limited company (Ltd.) legally organized under the laws of United Kingdom, having an address of
67/68 Hatton Garden, Suites 11/12
London EC1N8JY
United Kingdom

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

International Class 035: Advertising; marketing and promotional services; business consultancy; brand strategy, creation and advisory services; branding consultancy services; brand testing; market campaigns; development of advertising and promotional campaigns; production of commercials, advertising and online, television, cinema and radio commercials; production of video and sound recordings for marketing, advertising and publicity purposes; business research; provision of business information, data, analysis, advice and comment; producing reports relating to business information, business data and business forecasts, marketing and advertising, branding, design, product design, media advertising campaigns, sponsorship, PR, events, retail initiatives, the internet, market trends and market analysis; information, advisory and consultancy services relating to all the aforesaid services

Intent to Use: The applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the identified goods/services.

Priority based on foreign filing: The applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the identified goods/services and asserts a claim of priority based on European Union Trademark - EUTM application number 018090089, filed 07/02/2019.

INTENT TO PERFECT 44(d) : At this time, the applicant intends to rely on Section 44(e) as a basis for registration and requests that the application be suspended to await the submission of the foreign registration. If ultimately the applicant does not rely on §44(e) as a basis for registration, a valid claim of priority may be retained.

International Class 041: Entertainment; providing of training; training in relation to advertising and marketing; organisation of gaming and sporting events and competitions; presentation of live performances; production of radio and television programmes; audio and video recording services in the nature of production of pre-recorded video tapes, pre-recorded compact discs and pre-optical discs; publication of printed and online content; information, advisory and consultancy services relating to all the aforesaid services

Intent to Use: The applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the identified goods/services.

Priority based on foreign filing: The applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the identified goods/services and asserts a claim of priority based on European Union Trademark - EUTM application number 018090089, filed 07/02/2019.

INTENT TO PERFECT 44(d) : At this time, the applicant intends to rely on Section 44(e) as a basis for registration and requests that the application be suspended to await the submission of the foreign registration. If ultimately the applicant does not rely on §44(e) as a basis for registration, a valid claim of priority may be retained.

The applicant's current Attorney Information:

Matthew A. Homyk and Timothy D. Pecsénye, David M. Perry, Bruce D. George, Lisa Casey Spaniel, Megan E. Spitz, Zachary A. Aria,

John Sullivan, Bradford Craig, Shaun J. Bockert, Thomas H. Kelly, Samar Aryani-Sabet, Blake Fink of Blank Rome LLP One Logan Square
Philadelphia, Pennsylvania 19103
United States
215-569-5360(phone)
215-832-5360(fax)
mhomyk@blankrome.com (authorized)
The attorney docket/reference number is 145135-00118.

The applicant hereby appoints Matthew A. Homyk of Blank Rome LLP
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Philadelphia Pennsylvania 19103
United States
215-569-5360(phone)
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The applicant's current Correspondence Information:

Matthew A. Homyk
Blank Rome LLP
One Logan Square
Philadelphia, Pennsylvania 19103
215-569-5360(phone)
215-832-5360(fax)
mhomyk@blankrome.com (authorized)

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A fee payment in the amount of \$550 has been submitted with the application, representing payment for 2 class(es).

Declaration

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- The mark is in use in commerce on or in connection with the goods/services in the application;
- The specimen(s) shows the mark as used on or in connection with the goods/services in the application; and
- To the best of the signatory's knowledge and belief, the facts recited in the application are accurate.

And/Or

If the applicant is filing the application based on an intent to use the mark in commerce under 15 U.S.C. § 1051(b), § 1126(d), and/or § 1126(e):

- The signatory believes that the applicant is entitled to use the mark in commerce;
 - The applicant has a bona fide intention to use the mark in commerce on or in connection with the goods/services in the application; and
 - To the best of the signatory's knowledge and belief, the facts recited in the application are accurate.
- To the best of the signatory's knowledge and belief, no other persons, except, if applicable, concurrent users, have the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other persons, to cause confusion or mistake, or to deceive.
- To the best of the signatory's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances, the allegations and other factual contentions made above have evidentiary support.
- The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. §

1001, and that such willful false statements and the like may jeopardize the validity of the application or submission or any registration resulting therefrom, declares that all statements made of his/her own knowledge are true and all statements made on information and belief are believed to be true.

Declaration Signature

Signature: /matthew homyk/ Date: 07/03/2019
Signatory's Name: Matthew A. Homyk
Signatory's Position: Attorney of record, Pennsylvania bar member
Payment Sale Number: 88500458
Payment Accounting Date: 07/05/2019

Serial Number: 88500458
Internet Transmission Date: Wed Jul 03 21:15:21 EDT 2019
TEAS Stamp: USPTO/BAS-XX.XXX.XXX.XXX-201907032115219
04903-88500458-620988e26425deee92ba6925c
d5f918effac26df5da390c6e884148c8bd93e1
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