

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ABG EPE IP, LLC,

Plaintiff,

v.

Civil Action No.

**a78808908; ALLISON Store; AMARAroom;
amber886; amzbotLOL; angel10dm;
angel2dm; angel3dm; angel3tm; angel4dm;
angel5dm; angel7dm; angel8dm; angle3fj;
aokley; autoitems; BaiRunYi100; Be Mall;
Beautiful&sister; Blingbling Art Home;
brandPAURO; Bruce Patterson; buydhshuzia;
buyinqiadhtia; CDSBAIXIANGMIAOMAOYI;
changzhishixinrundacanyinfuwuyouxiangongsi;
CHUANshi; DAFASHI176; Damai
International; DAMAI888; DaYang Shangmao;
Designomyte!; dingyingying68687; discountz-
world;
DongFangShiWeiNiMaoYiYouXianGongSi;
dongzhiguangzhineng; ESHUJIA; FaceYee;
factory_top; FengYunStore; fengzh; fidget8;
Free beauty; FRESHOER; FuChenZhiJia;
gangtie118; gaozixuanbeimei; gfootl; GIPOPO;
gloryguitarcentral; Good luck sign shop; good-
roiexx; Guangzhou Yuexiu Anhu Trading Co.,
LTD; guoqing06; GUOSENLIN; gutlangg;
Gwendolyn Nguyen;
haikouchutingfuzhuanggerenduizi; hairsalon88;
HeBeiXinMaoYangMaoYiYouXianGongSi;
hezeaotewangluokejiyouxiangongsi;
higoodhgate; HKDTRADE; Hnweisheng-us;
HomeDC; HomeTow; HYUIERT; IFUAQZ;
INRENG; international_guitar; IrinaLit; I-Zee**

789 Shop; Jersey Retail; jhfgtyftf; jinjin0123;
 jinlan08; julin105; Juneyetdirect;
 junyingerfans; Kalosa Hair Store; Karlery
 Flagship Store; keephappy5; KENZXU;
 Krylosova; ksgseller; Lanakam; Laoshizi Store;
 Larben; leezeshaw; Lemarnia;
 liqingxiadiyigedian; liuquleshi; lizhng523699;
 luoheshimingshishang; MariposaPrints;
 mart005; masonicbikerjewelry; mengyang09;
 metal_coin; mingyanginf; MisaShop; musuo08;
 New Hot Jewelry;
 NingXiangShiXingJiaBaiHuoDian;
 NINGXSM215; N-ya-ko; OakkyDirect; Ocean
 Line; Pelopy; PGbureau - Printed Goodies
 Bureau; phamtoms; PingAn XiLe; polouxie;
 Pop-art Poster; popxcap; Porterpan; psg2;
 Puzzleartworkshop; Puzzlefuns; QCMceom;
 QiLingBhd204; qinglonggege; QQQCK;
 ruguojun; SANG IN BONG; Satisfaction1st;
 sgzjguitar; SHANHONGRUI; SHANJIE;
 shanxideshengjiaheshangmaoyouxiangongsi;
 shenyangshihuangguquoudibaihuodian;
 Shenzhen YanQuan E-Business Co.,Ltd;
 sherry168; sherry522; SICHYUAN; SNAKE1;
 storeying; Susan Ashley; SUZHIJYB004;
 TAISUO; tangbinfff; The first paint; tian0996;
 tianyc; tiger25; Tonko; Topcosplay Official
 Store; wanlangfangzhou; wanyuem; Weidding
 Ks Store; weishanggift; weloveshoes888;
 Wooer;
 wuhandongshunqichepeiijianyouxiangongsi;
 xiangchengshihejuxinshangmaoyouxiangongsi;
 xiangyu527; xiguajiang store; XqBhuo130;
 xyfz5; YangmingStore;
 YaXuanWangLuoKeJiYouXianGongSi;
 yaxunfuzhou; yipobuydhgatetuy; yiwusyxiud;
 youyou69; yuanzhouquyangzhibaihuodian;

**Yuhang wig; yunshijita756638;
yuqipingmiansheji;
zhengzhoujuewanwangluokejiyouxiangongsi;
zhengzhoulancongshangmaoyouxiangongsi;
Zhiyuan Store; ZHOOU; ZIMALUS; and ZZ-
store,**

Defendants.

COMPLAINT

1) This is an action for federal trademark infringement and counterfeiting, and false designation of origin, in violation of [15 U.S.C. §§ 1051 et seq.](#), and common law trademark infringement and unfair competition.

2) This Court has subject matter jurisdiction over the federal trademark infringement, counterfeiting, and false designation of origin claims pursuant to [15 U.S.C. § 1121](#). This Court has supplemental jurisdiction over the remaining common law claims pursuant to [28 U.S.C. § 1367](#).

3) This Court has personal jurisdiction over the Defendants because Defendants, on information and belief, transact business within Georgia or have committed a tortious injury within Georgia caused by an act or omission outside the state and regularly do or solicit business, or engage in other persistent courses of conduct, or derive substantial revenue from goods used or consumed in Georgia.

4) Alternatively, this Court has personal jurisdiction over the Defendants pursuant to Federal Rule of Civil Procedure 4(k)(2) if any given Defendant is not subject to the jurisdiction of any state's court of general jurisdiction, because exercising jurisdiction over each Defendant is consistent with the United States Constitution and its laws.

5) Venue is appropriate in this judicial district pursuant to 28 U.S.C. § 1391 because a substantial part of the property that is the subject of the action is situated in this district, and/or because the Defendants are subject to personal jurisdiction in this district, and/or because Defendants do not reside in the United States and, therefore, may be sued in any judicial district.

THE PARTIES

6) ABG EPE IP, LLC is a Tennessee limited liability company with its principal place of business at 1411 Broadway, FL 21, New York, New York 10018-3471.

7) On information and belief, Defendants a78808908; ALLISON Store; AMARARoom; amber886; amzbotLOL; angel10dm; angel2dm; angel3dm; angel3tm; angel4dm; angel5dm; angel7dm; angel8dm; angle3fj; aokley; autoitems; BaiRunYi100; Be Mall; Beautiful&sister; Blingbling Art Home; brandPAURO; Bruce Patterson; buydhshuzia; buyinqiadhtia; CDSBAIXIANGMIAOMAOYI;

changzhishixinrundacanyinfuwuyouxiangongsi; CHUANshi; DAFASHI176;
Damai International; DAMAI888; DaYang Shangmao; Designomyte!;
dingyingying68687; discountz-world;
DongFangShiWeiNiMaoYiYouXianGongSi; dongzhiguangzhineng; ESHUJIA;
FaceYee; factory_top; FengYunStore; fengzh; fidget8; Free beauty; FRESHOER;
FuChenZhiJia; gangtie118; gaozixuanbeimei; gfootl; GIPOPO; gloryguitarcentral;
Good luck sign shop; good-roiexx; Guangzhou Yuexiu Anhu Trading Co., LTD;
guoqing06; GUOSENLIN; gutlangg; Gwendolyn Nguyen;
haikouchutingfuzhuanggerenduzi; hairsalon88;
HeBeiXinMaoYangMaoYiYouXianGongSi; hezeaotewangluokejiyouxiangongsi;
higoodhgate; HKDTRADE; Hnweisheng-us; HomeDC; HomeTow; HYUIERT;
IFUAQZ; INRENG; international_guitar; IrinaLit; I-Zee 789 Shop; Jersey Retail;
jhfgytftytf; jinjin0123; jinlan08; julin105; Juneyetdirect; junyingerfans; Kalosa Hair
Store; Karlery Flagship Store; keephappy5; KENZXU; Krylosova; ksgseller;
Lanakam; Laoshizi Store; Larben; leezeshaw; Lemarnia; liqingxiadiyigedian;
liuquleshi; lizhng523699; luoheshimingshishang; MariposaPrints; mart005;
masonicbikerjewelry; mengyang09; metal_coin; mingyanginf; MisaShop;
musuo08; New Hot Jewelry; NingXiangShiXingJiaBaiHuoDian; NINGXSM215;
N-ya-ko; OakkyDirect; Ocean Line; Pelopy; PGbureau - Printed Goodies Bureau;

phantoms; PingAn XiLe; polouxie; Pop-art Poster; popxcap; Porterpan; psg2;
Puzzleartworkshop; Puzzlefuns; QCMceom; QiLingBhd204; qinglonggege;
QOQCK; ruguojun; SANG IN BONG; Satisfaction1st; sgzjguitar;
SHANHONGRUI; SHANJIE; shanxideshengjiaheshangmaoyouxiangongsi;
shenyangshihuangguquoudibaihuodian; Shenzhen YanQuan E-Business Co.,Ltd;
sherry168; sherry522; SICHYUAN; SNAKE1; storeying; Susan Ashley;
SUZHIJYB004; TAISUO; tangbinfff; The first paint; tian0996; tianyc; tiger25;
Tonko; Topcosplay Official Store; wanlangfangzhou; wanyuem; Weidding Ks
Store; weishanggift; weloveshoes888; Wooer;
wuhandongshunqichepeijianyouxiangongsi;
xiangchengshihejuxinshangmaoyouxiangongsi; xiangyu527; xiguajiang store;
XqBhuo130; xyfz5; YangmingStore; YaXuanWangLuoKeJiYouXianGongSi;
yaxunfuzhou; yipobuydhgatetuy; yiwusyxiud; youyou69;
yuanzhouquyangzhibaihuodian; Yuhang wig; yunshijita756638;
yuqipingmiansheji; zhengzhoujuewanwangluokejiyouxiangongsi;
zhengzhoulancongshangmaoyouxiangongsi; Zhiyuan Store; ZHOOU; ZIMALUS;
and ZZ-store (“Defendants”) are foreign entities, associations, or individuals with
unknown locations, all of whom advertise and sell a variety of goods through their
virtual storefronts on various e-commerce marketplaces, such as Alibaba,

AliExpress, DHGate, Amazon, Ebay, Joom, and/or Wish (each a “Marketplace” and collectively the “Marketplaces”).

8) Each Defendant is known to Plaintiff only by its unique Marketplace name and ID number.

9) On information and belief, Defendants offer for sale, sell, and ship goods to customers in the United States, including in this judicial district, through their virtual storefronts on the Marketplaces.

RELEVANT FACTS

Plaintiff’s Trademarks

10) Effective November 18, 2013, Plaintiff purchased all intellectual property, including all trademark rights of Elvis Presley’s estate and is current owner of the global trademark portfolio of the late Elvis Presley.

11) Elvis Presley (“Elvis”), an iconic American musician, singer, and actor, is a household name around the world.

12) Known as the “King of Rock ‘n’ Roll,” Elvis has sold over one billion records worldwide, had over 150 albums and singles certified gold, platinum, and multi-platinum, had 53 Top 40 albums on the Billboard Top 200 chart, won three Grammy® Awards for gospel music, holds the record for Most Top 40 hits (at 114

total), has been inducted into the Rock ‘n’ Roll, Country, Gospel, Rockabilly, and R&B Halls of Fame, and starred in 31 feature films.

13) Plaintiff owns numerous federal trademark applications and registrations for its valuable trademarks including, but not limited to, ELVIS, ELVIS PRESLEY, JAILHOUSE ROCK, BLUE SUEDE, KING OF ROCK N ROLL, LOVE ME TENDER, and many more. Attached hereto as Exhibit A are true and correct copies of certificates of registration reflecting Plaintiff’s federal trademarks (collectively, “Marks” or “Plaintiff’s Marks”).

14) Each of the registrations for Plaintiff’s Marks is valid and enforceable.

15) Plaintiff has used its Marks in commerce for many decades, some since as early as 1954, and has not abandoned any of the Marks.

16) As a result of Plaintiff’s extensive advertising and promotion of its goods under Plaintiff’s Marks, Plaintiff’s Marks have achieved considerable goodwill throughout the United States and the world.

17) On information and belief, Defendants offer for sale and sell a wide variety of goods to customers in the United States, including in this judicial district.

18) On information and belief, Defendants routinely sell goods bearing counterfeit or infringing marks of well-known trademark owners.

19) On information and belief, Defendants hide their true identities by using aliases, withholding or providing false contact information, or otherwise using false and deceptive means to avoid detection.

20) Defendants are using in commerce colorable imitations of one or more of Plaintiff's Marks, or marks that are confusingly similar to one or more of Plaintiff's Marks, on or in connection with the advertising and sale of goods that are similar to or compete with Plaintiff's well-known goods.

21) Defendants are advertising and selling goods bearing counterfeit or infringing copies of Plaintiff's Marks through their respective virtual storefronts on the Marketplaces.

22) Plaintiff and/or the undersigned counsel have reviewed all of the product listings at issue for each Defendant and confirmed that (a) each Defendant is using a spurious mark which is identical with or substantially indistinguishable from one or more of Plaintiff's Marks on non-genuine reproductions of Plaintiff's goods; or (b) each Defendant is using a mark confusingly similar to one or more of Plaintiff's Marks in association with the marketing or sale of other goods and in such a manner as to confuse customers into believing the goods are genuine.

23) None of the Defendants are authorized to offer for sale or sell goods bearing any of Plaintiff's Marks. Genuine goods bearing Plaintiff's Marks may be

purchased only from Plaintiff directly or from its authorized distributors or licensees.

24) Based on the undersigned counsel's experience prosecuting similar cases, Defendants likely operate multiple virtual storefronts within and across multiple Marketplaces, are related to the manufacturers or suppliers of the counterfeit and/or infringing goods, coordinate with each other to acquire, market, sell, and distribute counterfeit and/or infringing goods, sell the counterfeit and/or infringing goods through the same limited number of e-commerce marketplace platforms that are well-known as sources of counterfeit and/or infringing goods, share images and information about the counterfeit and/or infringing goods for use on their Marketplace storefronts, and participate in on-line forums dedicated to informing Marketplace sellers of new lawsuits and sharing defense and settlement strategies.

COUNT I.

INFRINGEMENT OF A REGISTERED TRADEMARK **IN VIOLATION OF 15 U.S.C. § 1114**

25) Paragraphs 1-24 are realleged and incorporated herein by reference.

26) Defendants are using marks or symbols in commerce that are likely to cause confusion, or to cause mistake, or to deceive, and likely to cause purchasers and potential purchasers to falsely believe that Defendants' goods are sponsored

by, approved by, or affiliated with Plaintiff, or that Plaintiff's goods are sponsored by, approved by, or affiliated with Defendants.

27) Defendants are using in commerce marks or symbols that are identical to, substantially indistinguishable from, colorable imitations of, or confusingly similar to Plaintiff's Marks, and the unauthorized use of Plaintiff's Marks by Defendants in commerce is likely to cause damage and other irreparable injury to Plaintiff unless such use is enjoined by this Court, Plaintiff having no adequate remedy at law.

28) Defendants' use of marks in commerce that are identical to, substantially indistinguishable from, colorable imitations of, or confusingly similar to Plaintiff's Marks constitutes an infringement of Plaintiff's rights in and to its federally registered Marks in violation of [15 U.S.C. § 1114](#).

29) After a reasonable opportunity for further investigation and discovery, it is likely the evidence will show that Defendants' aforesaid acts have been and are being committed with knowledge of Plaintiff's Marks, and that such acts are likely to cause confusion, or to cause mistake, or to deceive. Defendants' acts are therefore intentional, willful, and are maliciously calculated to cause confusion, to cause mistake, or to deceive. As such, this is an exceptional case.

30) In accordance with 15 U.S.C. § 1117, Plaintiff is entitled to recover from Defendants: (1) their profits, (2) any damages sustained by Plaintiff, and (3) the costs of the instant action. Further, based upon the nature of Defendants' violation of Plaintiff's trademark rights, Plaintiff is entitled to reasonable attorney's fees, treble damages, and/or enhanced profits.

31) Plaintiff is further entitled to an award of three times its damages or Defendants' profits for those Defendants found to be intentionally using a counterfeit mark, pursuant to 15 U.S.C. § 1117(b).

32) Alternatively, Plaintiff may elect at any time before judgment to recover, instead of actual damages or profits, an award of statutory damages of not less than \$1,000 or more than \$2,000,000 per counterfeit mark per type of good sold or offered for sale.

33) Plaintiff has been or is likely to be irreparably damaged by Defendants' use of counterfeit and/or infringing marks in the United States and will continue to be irreparably damaged unless such use is immediately and permanently enjoined by this Court.

COUNT II.

FEDERAL UNFAIR COMPETITION IN VIOLATION OF **15 U.S.C. § 1125(a)**

34) Paragraphs 1-24 are realleged and incorporated herein by reference.

35) In marketing and selling their goods in commerce in the United States, Defendants have used in connection with their goods a false designation of origin that is likely to cause confusion, to cause mistake, or to deceive others to believe that Defendants' goods are sponsored by, approved by, originate with, or are affiliated with Plaintiff, or that Plaintiff's goods are sponsored by, approved by, originate with, or are affiliated with Defendants. Defendants have caused their goods to be offered for sale in commerce with knowledge of such false designation of origin or description or representation.

36) Defendants have willfully promoted in commerce the sale of their goods in a manner so as to falsely designate an origin or an association with Plaintiff or with Plaintiff's Marks, so as to be likely to cause confusion or mistake among purchasers as to the true origin, source, sponsorship, or affiliation of Plaintiff's or Defendants' goods, all to Defendants' profit and to Plaintiff's damage.

37) Plaintiff has been and/or will be irreparably damaged by the use of such false designation and/or representation and will continue to be irreparably damaged unless Defendants are preliminarily and permanently enjoined by this Court, Plaintiff having no adequate remedy at law.

38) Defendants' acts constitute unfair competition, false designation of origin, and false description in violation of 15 U.S.C. § 1125(a).

39) In accordance with 15 U.S.C. § 1117, Plaintiff is entitled to recover from Defendants: (1) their profits, (2) any damages sustained by Plaintiff, and (3) the costs of the instant action. Further, based upon the willful nature of Defendants' violation of Plaintiff's trademark rights, Plaintiff is entitled to reasonable attorney's fees and the trebling of such profits or damages.

COUNT III.

COMMON LAW TRADEMARK INFRINGEMENT AND UNFAIR COMPETITION

40) Paragraphs 1-24 are realleged and incorporated herein by reference.

41) Defendants' use of marks that are confusingly similar to Plaintiff's Marks, in connection with goods which are the same as or are competitive with the goods of Plaintiff, is likely to cause confusion, to cause mistake, and to deceive.

42) Defendants are offering their goods for sale with full knowledge of Plaintiff's Marks.

43) Defendants have promoted and offered for sale their goods in such a manner as to suggest an association, affiliation, or sponsorship with, or approval by Plaintiff, or so as to cause, or be likely to cause, confusion or mistake among

purchasers as to the origin or sponsorship of Plaintiff's or Defendants' goods, all to Defendants' profit and to Plaintiff's damage.

44) The aforesaid conduct of Defendants constitutes infringement of Plaintiff's common law rights in and to Plaintiff's Marks and further constitutes common law unfair competition, all of which has irreparably damaged and/or will irreparably damage Plaintiff, together with its goodwill and reputation, unless Defendants are enjoined and restrained by this Court, Plaintiff having no adequate remedy at law.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for a judgment of the Court as follows:

1) That Defendants, and those persons in active concert or participation with Defendants, be preliminarily and permanently enjoined and restrained from advertising, offering for sale, or selling any goods under or in connection with Plaintiff's Marks or any other designation, trademark, or service mark that is likely to cause confusion, mistake, or deception as to the source or sponsorship of Plaintiff's or Defendants' goods, or from otherwise infringing Plaintiff's Marks;

2) That an accounting be conducted and judgment be rendered against Defendants for:

a) all profits received by Defendants from the sale of goods under or in connection with Plaintiff's Marks in the United States;

b) all damages in an amount proven at trial from, *inter alia*, Defendants' trademark infringement, unfair competition, false designation of origin and false description or representation, pursuant to 15 U.S.C. § 1051 *et seq.*; and

c) any other actual and compensatory damages in an amount not presently known but to be computed during the pendency of this action.

3) That any damages assessed against Defendants for trademark infringement and unfair competition be trebled as provided by 15 U.S.C. § 1117, and any profits be enhanced as warranted;

4) Alternatively, that Plaintiff be awarded statutory damages from each Defendant found to be using a counterfeit mark of no less than \$1,000 and no more than \$2,000,000 per mark per type of good sold;

5) That Defendants be directed to file with the Court and serve upon Plaintiff, no later than thirty (30) days after the issuance of an injunction, a report in writing and under oath, setting forth in detail the manner and form in which each has complied with the injunctions requested in the immediately preceding paragraphs and any other provision of this Court's Order;

- 6) That Plaintiff have and recover its costs in this suit, including but not limited to reasonable attorney's fees and expenses; and
- 7) That Plaintiff have such other and further relief as this Court may deem just and proper.

Dated: January 5, 2022.

Respectfully submitted,
THE SLADKUS LAW GROUP

s/ Carrie A. Hanlon
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Atlanta, GA 30318
Telephone: (404) 252-0900
Facsimile: (404) 252-0970

Attorneys for Plaintiff

Exhibit A

United States of America

United States Patent and Trademark Office

ALL SHOOK UP

Reg. No. 3,718,615 ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
Registered Dec. 1, 2009 3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

Int. Cl.: 33 FOR: WINE, IN CLASS 33 (U.S. CLS. 47 AND 49).

TRADEMARK FIRST USE 9-30-2006; IN COMMERCE 9-30-2006.
PRINCIPAL REGISTER THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

OWNER OF U.S. REG. NOS. 3,055,493 AND 3,276,607.

SER. NO. 77-771,102, FILED 6-30-2009.

ALLISON SCHRODY, EXAMINING ATTORNEY



David J. Kyjars

Director of the United States Patent and Trademark Office

United States of America

United States Patent and Trademark Office

BLUE HAWAII

Reg. No. 3,866,674

Registered Oct. 26, 2010

Int. Cl.: 33

TRADEMARK

PRINCIPAL REGISTER

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BOULEVARD
MEMPHIS, TN 38116

FOR: WINE, IN CLASS 33 (U.S. CLS. 47 AND 49).

FIRST USE 12-31-2008; IN COMMERCE 12-31-2008.

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

OWNER OF U.S. REG. NO. 3,331,963.

SER. NO. 77-890,842, FILED 12-10-2009.

MORGAN WYNNE, EXAMINING ATTORNEY



David J. Kyfos

Director of the United States Patent and Trademark Office

Int. Cl.: 33

Prior U.S. Cls.: 47 and 49

Reg. No. 3,145,462

United States Patent and Trademark Office

Registered Sep. 19, 2006

**TRADEMARK
PRINCIPAL REGISTER**

BLUE SUEDE

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

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

FOR: WINE, IN CLASS 33 (U.S. CLS. 47 AND 49).

SER. NO. 78-741,733, FILED 10-27-2005.

FIRST USE 2-24-2004; IN COMMERCE 2-24-2004.

STEVEN JACKSON, EXAMINING ATTORNEY

Int. Cl.: 25

Prior U.S. Cls.: 22 and 39

Reg. No. 2,808,601

United States Patent and Trademark Office

Registered Jan. 27, 2004

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

FOR: CLOTHING, NAMELY, SHIRTS, PANTS, COATS AND HATS, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 8-16-2002; IN COMMERCE 8-16-2002.

OWNER OF U.S. REG. NOS. 1,327,127, 2,342,232 AND OTHERS.

THE NAME(S), PORTRAIT(S), AND/OR SIGNATURE(S) SHOWN IN THE MARK DOES NOT IDENTIFY A PARTICULAR LIVING INDIVIDUAL.

SER. NO. 78-180,387, FILED 10-31-2002.

KATHLEEN M. VANSTON, EXAMINING ATTORNEY

Int. Cl.: 30

Prior U.S. Cl.: 46

United States Patent and Trademark Office

Reg. No. 3,386,025

Registered Feb. 19, 2008

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)

3734 ELVIS PRESLEY BLVD.

MEMPHIS, TN 38116

FOR: COFFEE; HOT CHOCOLATE, IN CLASS 30 (U.S. CL. 46).

FIRST USE 3-31-2006; IN COMMERCE 3-31-2006.

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

OWNER OF U.S. REG. NOS. 1,265,579, 1,327,127, AND OTHERS.

SN 77-049,968, FILED 11-22-2006.

CHARLOTTE CORWIN, EXAMINING ATTORNEY

Int. Cl.: 25

Prior U.S. Cls.: 22 and 39

United States Patent and Trademark Office

Reg. No. 3,554,763

Registered Dec. 30, 2008

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

OWNER OF U.S. REG. NOS. 1,265,579, 1,327,127,
AND OTHERS.

FOR: FOOTWEAR, IN CLASS 25 (U.S. CLS. 22 AND 39).

THE NAME(S), PORTRAIT(S), AND/OR SIGNATURE(S) SHOWN IN THE MARK DOES NOT IDENTIFY A PARTICULAR LIVING INDIVIDUAL.

FIRST USE 3-31-2007; IN COMMERCE 3-31-2007.

SN 77-160,749, FILED 4-19-2007.

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

CHRISIE B. KING, EXAMINING ATTORNEY

Int. Cl.: 9

Prior U.S. Cl.: 36

United States Patent and Trademark Office

Reg. No. 1,265,579

Registered Jan. 31, 1984

TRADEMARK
Principal Register

ELVIS

Estate of Elvis Presley (Tennessee estate)
3764 Elvis Presley Blvd.
Memphis, Tenn. 38116

For: PRERECORDED AUDIO MAGNETIC
TAPES AND PHONOGRAPH ALBUMS, in
CLASS 9 (U.S. Cl. 36).

First use Oct. 1956; in commerce Oct. 1956.

Ser. No. 304,769, filed Apr. 8, 1981.

CONNIE M. JUDGE, Examining Attorney

Int. Cl.: 16

Prior U.S. Cl.: 38

United States Patent and Trademark Office

Reg. No. 1,267,105

Registered Feb. 14, 1984

TRADEMARK
Principal Register

ELVIS

Estate of Elvis Presley (Tennessee estate)
3764 Elvis Presley Blvd.
Memphis, [Tenn. 38116](#)

For: PRINTS AND PUBLICATIONS—NAME-
LY, POSTERS AND RECORD ALBUM JACK-
ETS, in CLASS 16 (U.S. Cl. 38).

First use Oct. 1956; in commerce Oct. 1956.

Ser. No. 304,770, filed Apr. 8, 1981.

CONNIE M. JUDGE, Examining Attorney

Int. Cl.: 6

Prior U.S. Cl.: 13

United States Patent and Trademark Office

Reg. No. 1,327,990

Registered Apr. 2, 1985

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS

ELVIS PRESLEY ENTERPRISES, INC. (TEN-
NESSEE CORPORATION)
SUITE 336
4646 POPLAR AVE.
MEMPHIS, TN 38117

FIRST USE 8-0-1982; IN COMMERCE
8-0-1982.

SER. NO. 477,236, FILED 4-25-1984.

FOR: METAL KEY RINGS WITH AT-
TACHED TAGS, IN CLASS 6 (U.S. CL. 13).

ERNEST H. LAND, EXAMINING ATTORNEY

Int. Cl.: 25

- Prior U.S. Cl.: 39

United States Patent and Trademark Office

Reg. No. 1,327,127

Registered Mar. 26, 1985

TRADEMARK

Principal Register

ELVIS

Elvis Presley Enterprises, Inc. (Tennessee
corporation)
Suite 336
4646 Poplar Ave.
Memphis, Tenn. 38117

For: CLOTHING—NAMELY, T-SHIRTS AND
JACKETS, in CLASS 25 (U.S. Cl. 39).
First use Jun. 7, 1982; in commerce Jun. 7, 1982.

Ser. No. 470,201, filed Mar. 14, 1984.

ROBERT C. CLARK, JR., Examining Attorney

United States of America

United States Patent and Trademark Office

ELVIS

Reg. No. 3,758,646 ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
Registered Mar. 9, 2010 3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

Int. Cls.: 9 and 25 FOR: EYE GLASSES; SPORTS EYEWEAR; SUNGLASSES, NAMELY, NOVELTY
SUNGLASSES, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

TRADEMARK FIRST USE 12-31-2003; IN COMMERCE 12-31-2003.
PRINCIPAL REGISTER

FOR: FITTED HALLOWEEN COSTUMES; JUMPSUITS, SCARVES, BELTS, CAPES, MAS-
QUERADE COSTUMES AND COSTUME MASKS SOLD IN CONNECTION THEREWITH;
COSTUMES FOR USE IN ROLE-PLAY, DRESS-UP AND CHILDREN'S GAMES; NOVELTY
HEADWEAR WITH ATTACHED WIGS; AND HALLOWEEN COSTUMES, IN CLASS 25
(U.S. CLS. 22 AND 39).

FIRST USE 12-31-2003; IN COMMERCE 12-31-2003.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PAR-
TICULAR FONT, STYLE, SIZE, OR COLOR.

OWNER OF U.S. REG. NOS. 1,267,105, 3,004,018, AND OTHERS.

THE NAME(S), PORTRAIT(S), AND/OR SIGNATURE(S) SHOWN IN THE MARK DOES NOT
IDENTIFY A PARTICULAR LIVING INDIVIDUAL.

SN 77-578,841, FILED 9-25-2008.

COLLEEN DOMBROW, EXAMINING ATTORNEY



David J. Kyfos

Director of the United States Patent and Trademark Office

Int. Cl.: 25

Prior U.S. Cls.: 22 and 39

United States Patent and Trademark Office

Reg. No. 2,994,296

Registered Sep. 13, 2005

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

FIRST USE 1-1-1995; IN COMMERCE 1-1-1995.

OWNER OF U.S. REG. NOS. 2,075,427, 2,512,317
AND OTHERS.

FOR: CLOTHING, NAMELY, MEN'S WOVEN SHIRTS, LOUNGEWEAR, SWIMWEAR, MEN'S WORK SHIRTS, ATHLETIC PANTS AND SHORTS, BOXER SHORTS, FLEECE JACKETS AND ACTIVE WEAR, NAMELY, SHIRTS, PANTS, JEANS, COATS, UNDERWEAR AND SOCKS, IN CLASS 25 (U.S. CLS. 22 AND 39).

THE NAME DOES NOT IDENTIFY A LIVING INDIVIDUAL.

SER. NO. 78-316,882, FILED 10-22-2003.

MARTHA FROMM, EXAMINING ATTORNEY

Int. Cl.: 18

Prior U.S. Cls.: 1, 2, 3, 22 and 41

Reg. No. 3,007,261

United States Patent and Trademark Office

Registered Oct. 18, 2005

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)

3734 ELVIS PRESLEY BLVD.

MEMPHIS, TN 38116

FOR: HANDHELD CONTAINERS; NAMELY COSMETIC BAGS SOLD EMPTY, PURSES AND HANDBAG, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FIRST USE 1-1-2003; IN COMMERCE 1-1-2003.

OWNER OF U.S. REG. NOS. 2,075,427, 2,512,317 AND OTHERS.

THE NAME DOES NOT IDENTIFY A LIVING INDIVIDUAL.

SEC. 2(F).

SER. NO. 78-316,955, FILED 10-22-2003.

LOURDES AYALA, EXAMINING ATTORNEY

Int. Cl.: 28

Prior U.S. Cls.: 22, 23, 38 and 50

Reg. No. 2,943,840

United States Patent and Trademark Office

Registered Apr. 26, 2005

**TRADEMARK
PRINCIPAL REGISTER**

Elvis

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)

3734 ELVIS PRESLEY BOULEVARD

MEMPHIS, TN 38116

FOR: PLUSH TOYS, IN CLASS 28 (U.S. CLS. 22, 23, 38 AND 50).

FIRST USE 8-5-1994; IN COMMERCE 8-5-1994.

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

OWNER OF U.S. REG. NOS. 2,241,437, 2,831,918 AND OTHERS.

SER. NO. 78-384,548, FILED 3-15-2004.

MICHAEL KAZAZIAN, EXAMINING ATTORNEY

Int. Cl.: 24

Prior U.S. Cls.: 42 and 50

United States Patent and Trademark Office

Reg. No. 2,946,097

Registered May 3, 2005

**TRADEMARK
PRINCIPAL REGISTER**

Elvis

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BOULEVARD
MEMPHIS, TN 38116

FOR: COTTON FABRIC, IN CLASS 24 (U.S. CLS. 42 AND 50).

FIRST USE 12-0-1993; IN COMMERCE 12-0-1993.

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

OWNER OF U.S. REG. NOS. 1,265,579, 2,831,918 AND OTHERS.

ELVIS DOES NOT IDENTIFY A PARTICULAR LIVING INDIVIDUAL.

SEC. 2(F).

SER. NO. 78-384,656, FILED 3-15-2004.

ANNE MADDEN, EXAMINING ATTORNEY

United States of America

United States Patent and Trademark Office

ELVIS

Reg. No. 3,858,340

Registered Oct. 5, 2010

Int. Cl.: 9

TRADEMARK

PRINCIPAL REGISTER

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

FOR: DOWNLOADABLE WALLPAPER, RINGTONES, AND VIDEO GAMES FOR MOBILE PHONES; MOBILE PHONE ACCESSORIES, NAMELY, FACE PLATES AND CELL PHONE COVERS, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 12-31-2009; IN COMMERCE 12-31-2009.

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

OWNER OF U.S. REG. NOS. 1,327,127, 2,959,924, AND OTHERS.

THE NAME "ELVIS" DOES NOT IDENTIFY A LIVING INDIVIDUAL.

SN 77-980,005, FILED 5-6-2009.

ALLISON SCHRODY, EXAMINING ATTORNEY



David J. Kyfos

Director of the United States Patent and Trademark Office

Int. Cl.: 9

Prior U.S. Cls.: 21, 23, 26, 36 and 38

Reg. No. 2,335,947

United States Patent and Trademark Office

Registered Mar. 28, 2000

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS

ELVIS PRESLEY ENTERPRISES, INC. (TEN-
NESSEE CORPORATION)
3734 ELVIS PRESLEY BOULEVARD
MEMPHIS, TN 38116

FIRST USE 12-1-1998; IN COMMERCE
12-1-1998.
OWNER OF U.S. REG. NOS. 2,075,845 AND
2,241,437.

FOR: SLOT MACHINES, IN CLASS 9 (U.S.
CLS. 21, 23, 26, 36 AND 38).

SER. NO. 75-709,542, FILED 5-19-1999.
LINDA GOLDMAN, EXAMINING ATTORNEY

Int. Cls.: 18 and 24

Prior U.S. Cls.: 1, 2, 3, 22, 41, 42 and 50

Reg. No. 2,948,059

United States Patent and Trademark Office

Registered May 10, 2005

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

FOR: COSMETIC BAGS SOLD EMPTY, PURSES, HANDBAGS, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FIRST USE 6-1-1993; IN COMMERCE 6-1-1993.

FOR: BED BLANKETS, BEACH TOWELS, THROW BLANKETS, AFGHAN BLANKETS, HAND TOWELS, WASH CLOTHS, BATH SHEET TOWELS, PILLOWCASES, SHEETS, COMFORTERS, IN CLASS 24 (U.S. CLS. 42 AND 50).

FIRST USE 1-6-1993; IN COMMERCE 1-6-1993.

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

OWNER OF U.S. REG. NOS. 2,075,427, 2,512,317 AND OTHERS.

ELVIS DOES NOT IDENTIFY A PARTICULAR LIVING INDIVIDUAL.

SEC. 2(F).

SER. NO. 78-413,937, FILED 5-6-2004.

ANNE MADDEN, EXAMINING ATTORNEY

Int. Cl.: 6

Prior U.S. Cls.: 2, 12, 13, 14, 23, 25 and 50

Reg. No. 3,004,018

United States Patent and Trademark Office

Registered Oct. 4, 2005

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)

3734 ELVIS PRESLEY BLVD.

MEMPHIS, TN 38116

FOR: METAL KEY CHAINS, LICENSE PLATES AND NON-LUMINOUS AND NON-MECHANICAL METAL SIGNS AND TIN CANS SOLD EMPTY, IN CLASS 6 (U.S. CLS. 2, 12, 13, 14, 23, 25 AND 50).

FIRST USE 6-7-1982; IN COMMERCE 6-7-1982.

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

OWNER OF U.S. REG. NOS. 2,075,427, 2,512,317 AND OTHERS.

THE NAME ELVIS DOES NOT IDENTIFY A LIVING INDIVIDUAL.

SER. NO. 78-414,069, FILED 5-6-2004.

ANNE MADDEN, EXAMINING ATTORNEY

Int. Cl.: 33

Prior U.S. Cls.: 47 and 49

Reg. No. 2,959,924

United States Patent and Trademark Office

Registered June 7, 2005

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

OWNER OF U.S. REG. NOS. 2,241,437, 2,831,918
AND OTHERS.

FOR: WINES, IN CLASS 33 (U.S. CLS. 47 AND 49).

THE NAME IN THE MARK DOES NOT IDENTIFY A LIVING INDIVIDUAL.

FIRST USE 1-1-2004; IN COMMERCE 1-1-2004.

SER. NO. 78-489,343, FILED 9-24-2004.

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

KARLA PERKINS, EXAMINING ATTORNEY

Int. Cl.: 8

Prior U.S. Cls.: 23 and 28

United States Patent and Trademark Office

Reg. No. 1,329,269

Registered Apr. 9, 1985

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS

ELVIS PRESLEY ENTERPRISES, INC. (TEN-
NESSEE CORPORATION)
SUITE 336
4646 POPLAR AVE.
MEMPHIS, TN 38117

FIRST USE 3-23-1983; IN COMMERCE
3-23-1983.

SER. NO. 477,238, FILED 4-25-1984.

FOR: PLASTIC, STAINLESS STEEL AND/OR
STERLING SILVER COLLECTOR'S SPOONS,
IN CLASS 8 (U.S. CLS. 23 AND 28).

ERNEST H. LAND, EXAMINING ATTORNEY

Int. Cls.: 14 and 16

Prior U.S. Cls.: 2, 5, 22, 23, 27, 28, 29, 37, 38 and 50

Reg. No. 2,115,521

United States Patent and Trademark Office

Registered Nov. 25, 1997

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

FOR: JEWELRY, CLOCKS, WATCHES, BRACELETS, JEWELRY CHAINS, CHARMS, CUFFLINKS, EARRINGS, IDENTIFICATION BRACELETS AND TAGS, JEWELRY PINS, LAPEL PINS, MEDALLIONS, NECKLACES, AND COINS MADE OF PRECIOUS METAL, IN CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).

FIRST USE 6-7-1982; IN COMMERCE 11-1-1987.

FOR: ADDRESS BOOKS, HOLIDAY/GREETING CARDS, ART PRINTS, ART REPRODUCTIONS, PAPER GIFT BAGS, WRITING INSTRUMENTS, LOOSE LEAF BINDERS, BOOK-ENDS, NON-FICTION AND REFERENCE BOOKS ABOUT THE GRACELAND MANSION, CHILDREN'S ACTIVITIES BOOKS, GIFT WRAPPING PAPER, BUMPER STICKERS, CALENDARS, CREDIT CARDS, NONMAGNETICALLY ENCODED TELEPHONE CALLING CARDS, BANK CHECKS, CHECKBOOK

COVERS, COMIC BOOKS, COMMEMORATIVE STAMPS THAT ARE NOT ISSUED BY U.S. POSTAL OFFICE, CONFETTI, DECALS, LETTER OPENERS, PAPER MERCHANDISE BAGS, PICTURES, PHOTOGRAPHIC PRINTS, PICTURE BOOKS, PLAYING CARDS, RECIPE BOOKS, RUBBER STAMPS, STATIONARY, STICKERS, TEMPORARY TATTOOS, TRADING CARDS, METAL TRADING CARDS AND CHALK BOARDS FOR HOME AND/OR SCHOOL, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 6-7-1982; IN COMMERCE 11-1-1987.

OWNER OF U.S. REG. NOS. 1,267,105, 1,928,215 AND OTHERS.

THE NAME IN THE MARK DOES NOT IDENTIFY A PARTICULAR LIVING INDIVIDUAL.

SEC. 2(F).

SER. NO. 75-128,250, FILED 7-1-1996.

KATHERINE STOIDES, EXAMINING ATTORNEY

Int. Cl.: 30

Prior U.S. Cl.: 46

Reg. No. 2,143,323

United States Patent and Trademark Office

Registered Mar. 10, 1998

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS

ELVIS PRESLEY ENTERPRISE, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BOULEVARD
MEMPHIS, TN 38116

FOR: POPPED POPCORN AND CONFECTIONERY GOODS, NAMELY, CHOCOLATE AND CANDY, IN CLASS 30 (U.S. CL. 46).

FIRST USE 12-0-1996; IN COMMERCE 12-0-1996.

OWNER OF U.S. REG. NOS. 1,267,105, 1,928,215, AND OTHERS.

THE NAME IN THE MARK DOES NOT IDENTIFY A PARTICULAR LIVING INDIVIDUAL.

SN 75-099,565, FILED 5-6-1996.

KATHERINE STOIDES, EXAMINING ATTORNEY

Int. Cls.: 9, 15, 20, 21 and 28

Prior U.S. Cls.: 2, 13, 21, 22, 23, 25, 26, 29, 30, 32,
33, 36, 38, 40 and 50

Reg. No. 2,241,437

United States Patent and Trademark Office

Registered Apr. 27, 1999

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS

ELVIS PRESLEY ENTERPRISES, INC. (TEN-
NESSEE CORPORATION)
3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

FOR: MUSICAL JUKE BOXES, IN CLASS 9
(U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 1-0-1996; IN COMMERCE
1-0-1996.

FOR: MUSICAL JUKE BOXES AND GUI-
TARS, IN CLASS 15 (U.S. CLS. 2, 21 AND 36).

FIRST USE 3-0-1996; IN COMMERCE
3-0-1996.

FOR: PILLOWS, MIRRORS OF THE FURNI-
TURE TYPE, HAND-HELD MIRRORS, NON-
METAL KEY CHAIN TAGS AND FOOT-
STOOLS, IN CLASS 20 (U.S. CLS. 2, 13, 22, 25, 32
AND 50).

FIRST USE 0-0-1956; IN COMMERCE
0-0-1956.

FOR: PORCELAIN FIGURINES FEATURING
MUSIC, IN CLASS 21 (U.S. CLS. 2, 13, 23, 29, 30,
33, 40 AND 50).

FIRST USE 3-0-1994; IN COMMERCE
3-0-1994.

FOR: CHRISTMAS TREE ORNAMENTS;
DART BOARDS, DARTS, DART FLIGHTS,
DART POINT SHARPENERS, DART POINTS,
DART SHAFTS, DART STEMS, DART BOARD
CASES AND DART SETS, CONSISTING PRI-
MARILY OF DART BOARDS AND DARTS;
GOLF BALLS; JIGSAW PUZZLES, MANIPULA-
TIVE PUZZLES, CUBE PUZZLES; BILLIARD
CUES; DOLLS AND THEIR ACCESSORIES;
BOARD GAMES; AND SOFT SCULPTURE
TOYS, IN CLASS 28 (U.S. CLS. 22, 23, 38 AND
50).

FIRST USE 0-0-1956; IN COMMERCE
0-0-1956.

OWNER OF U.S. REG. NOS. 1,265,579, 1,953,599
AND OTHERS.

THE NAME IN THE MARK DOES NOT
IDENTIFY A PARTICULAR LIVING INDIVID-
UAL.

SER. NO. 75-163,202, FILED 9-4-1996.

KATHERINE STOIDES, EXAMINING ATTOR-
NEY

Int. Cls.: 9 and 11

Prior U.S. Cls.: 13, 21, 23, 26, 31, 34, 36 and 38

Reg. No. 2,075,845

United States Patent and Trademark Office

Registered July 1, 1997

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS

ELVIS PRESLEY ENTERPRISES, INC. (TEN-
NESSEE CORPORATION)
3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

FOR: DECORATIVE REFRIGERATOR MAG-
NETS, COMPUTER PERIPHERAL MOUSE
PADS, COMPUTER KEYBOARDS, MUSICAL
JUKE BOXES, SUNGLASSES, TELEPHONES
AND MAGNETICALLY ENCODED DEBIT
CARDS, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36
AND 38).

FIRST USE 6-7-1982; IN COMMERCE
11-1-1987.

FOR: LAMPS, IN CLASS 11 (U.S. CLS. 13, 21,
23, 31 AND 34).

FIRST USE 4-1-1995; IN COMMERCE
9-1-1995.

OWNER OF U.S. REG. NOS. 1,267,105, 1,677,378
AND OTHERS.

THE NAME IN THE MARK DOES NOT
IDENTIFY A PARTICULAR LIVING INDIVID-
UAL.

SER. NO. 75-163,397, FILED 9-4-1996.

KATHERINE STOIDES, EXAMINING ATTOR-
NEY

Int. Cl.: 16

Prior U.S. Cls.: 22, 37 and 38

United States Patent and Trademark Office **Reg. No. 1,342,551**
Registered June 18, 1985

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS PRESLEY

ELVIS PRESLEY ENTERPRISES, INC. (TEN-
NESSEE CORPORATION)
SUITE 336
4646 POPLAR AVENUE
MEMPHIS, TN 38117

PAPER DOLL BOOKS, COLORING BOOKS,
AND COIN BOOKS, IN CLASS 16 (U.S. CLS. 22,
37 AND 38).

FIRST USE 0-0-1956; IN COMMERCE
0-0-1956.

FOR: PRINTED MATTER—NAMELY,
PHOTO ALBUMS, POST CARDS, NOTE PADS;
AND PRINTED PUBLICATIONS—NAMELY,

SER. NO. 470,199, FILED 3-14-1984.

CONNIE M. JUDGE, EXAMINING ATTORNEY

Int. Cl.: 21

Prior U.S. Cls.: 2, 30 and 33

United States Patent and Trademark Office

Reg. No. 1,674,265

Registered Feb. 4, 1992

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS PRESLEY

ELVIS PRESLEY ENTERPRISES, INC. (TEN-
NESSEE CORPORATION)
4646 POPLAR AVENUE
SUITE 336
MEMPHIS, TN 38117

FIRST USE 0-0-1956; IN COMMERCE
0-0-1956.

SER. NO. 73-470,200, FILED 3-14-1984.

FOR: BEVERAGEWARE; NAMELY, CA-
RAFES, MUGS, SHOT GLASSES, AND TUM-
BLERS, IN CLASS 21 (U.S. CLS. 2, 30 AND 33).

CONNIE M. JUDGE, EXAMINING ATTORNEY

Int. Cl.: 28

Prior U.S. Cl.: 22

United States Patent and Trademark Office

Reg. No. 1,329,791

Registered Apr. 9, 1985

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS PRESLEY

ELVIS PRESLEY ENTERPRISES, INC. (TEN-
NESSEE CORPORATION)
SUITE 336
4646 POPLAR AVE.
MEMPHIS, TN 38117

OWNER OF U.S. REG. NOS. 1,265,579 AND
1,267,105.

SER. NO. 478,487, FILED 5-3-1984.

FOR: DOLLS, IN CLASS 28 (U.S. CL. 22).
FIRST USE 2-1-1984; IN COMMERCE
2-1-1984.

JOHN P. RYNKIEWICZ, EXAMINING ATTOR-
NEY

Int. Cl.: 13

Prior U.S. Cls.: 2 and 9

United States Patent and Trademark Office

Reg. No. 2,512,317

Registered Nov. 27, 2001

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS PRESLEY

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BOULEVARD
MEMPHIS, TN 38116

FOR: COLLECTIBLE FIREARMS, IN CLASS 13
(U.S. CLS. 2 AND 9).

FIRST USE 1-0-1998; IN COMMERCE 1-0-1998.

OWNER OF U.S. REG. NOS. 169,862, 1,342,441,
AND 1,677,561.

THE NAME SHOWN IN THE MARK DOES NOT
IDENTIFY A LIVING INDIVIDUAL.

SER. NO. 76-136,688, FILED 9-27-2000.

KATHERINE STOIDES, EXAMINING ATTORNEY

Int. Cl.: 15

Prior U.S. Cl.: 36

United States Patent and Trademark Office Reg. No. 1,340,617
Registered June 11, 1985

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS PRESLEY

ELVIS PRESLEY ENTERPRISES, INC. (TEN-
NESSEE CORPORATION)
SUITE 336
4646 POPLAR AVENUE
MEMPHIS, TN 38117

FIRST USE 4-27-1984; IN COMMERCE
4-27-1984.

SER. NO. 507,803, FILED 11-8-1984.

FOR: MUSICAL INSTRUMENTS—NAMELY,
GUITARS, IN CLASS 15 (U.S. CL. 36).

CONNIE M. JUDGE, EXAMINING ATTORNEY

Int. Cl.: 14

Prior U.S. Cl.: 28

United States Patent and Trademark Office

Reg. No. 1,677,532

Registered Mar. 3, 1992

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS PRESLEY

ELVIS PRESLEY ENTERPRISES, INC. (TEN-
NESSEE CORPORATION)
3764 ELVIS PRESLEY BOULEVARD
MEMPHIS, TN 38116, ASSIGNEE OF PRESLEY,
PRISCILLA B. (UNITED STATES CITIZEN),
DBA EXECUTRIX OF THE ESTATE OF
ELVIS A. PRESLEY, AN ESTATE OF TEN-
NESSEE MEMPHIS, TN 38116 AND HANKS,
JOSEPH A. (UNITED STATES CITIZEN),
DBA EXECUTOR OF THE ESTATE OF
ELVIS A. PRESLEY, AN ESTATE OF TEN-
NESSEE MEMPHIS, TN 38116 AND NATION-
AL BANK OF AMERICA (UNITED STATES

NATIONAL BANK), DBA EXECUTOR OF
THE ESTATE OF ELVIS A. PRESLEY, AN
ESTATE OF TENNESSEE MEMPHIS, TN
38116

FOR: JEWELRY, IN CLASS 14 (U.S. CL. 28).
FIRST USE 0-0-1956; IN COMMERCE
0-0-1956.

SER. NO. 73-292,301, FILED 1-9-1981.

ALAN DATRI, EXAMINING ATTORNEY

Int. Cl.: 16

Prior U.S. Cl.: 38

United States Patent and Trademark Office **Reg. No. 1,677,561**
Registered Mar. 3, 1992

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS PRESLEY

ELVIS PRESLEY ENTERPRISES, INC. (TEN-
NESSEE CORPORATION)
3764 ELVIS PRESLEY BOULEVARD
MEMPHIS, TN 38116, ASSIGNEE OF PRESLEY,
PRISCILLA B. (UNITED STATES CITIZEN),
DBA EXECUTOR OF THE ESTATE OF
ELVIS A. PRESLEY, AN ESTATE OF TEN-
NESSEE MEMPHIS, TN 38116 AND HANKS,
JOSEPH A. (UNITED STATES CITIZEN),
DBA EXECUTOR OF THE ESTATE OF
ELVIS A. PRESLEY, AN ESTATE OF TEN-
NESSEE MEMPHIS, TN 38116 AND NATION-
AL BANK OF AMERICA (UNITED STATES

NATIONAL BANK), DBA EXECUTOR OF
THE ESTATE OF ELVIS A. PRESLEY, AN
ESTATE OF TENNESSEE MEMPHIS, TN
38116

FOR: PRINTS AND PUBLICATIONS;
NAMELY, POSTERS, IN CLASS 16 (U.S. CL. 38).
FIRST USE 4-0-1956; IN COMMERCE
4-0-1956.

SER. NO. 73-292,315, FILED 1-9-1981.

CONNIE M. JUDGE, EXAMINING ATTORNEY

Int. Cl.: 9

Prior U.S. Cl.: 36

United States Patent and Trademark Office

Reg. No. 1,677,378

Registered Mar. 3, 1992

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS PRESLEY

ELVIS PRESLEY ENTERPRISES, INC. (TEN-
NESSEE CORPORATION)
3764 ELVIS PRESLEY BOULEVARD
MEMPHIS, TN 38116, ASSIGNEE OF PRESLEY,
PRISCILLA B. (UNITED STATES CITIZEN),
DBA EXECUTOR OF THE ESTATE OF
ELVIS A. PRESLEY, AN ESTATE OF TEN-
NESSEE MEMPHIS, TN 38116 AND HANKS,
JOSEPH A. (UNITED STATES CITIZEN),
DBA EXECUTOR OF THE ESTATE OF
ELVIS A. PRESLEY, AN ESTATE OF TEN-
NESSEE MEMPHIS, TN 38116 AND NATION-
AL BANK OF AMERICA (UNITED STATES

NATIONAL BANK), DBA EXECUTOR OF
THE ESTATE OF ELVIS A. PRESLEY, AN
ESTATE OF TENNESSEE MEMPHIS, TN
38116

FOR: MAGNETIC TAPES AND PHONO-
GRAPH RECORDS, IN CLASS 9 (U.S. CL. 36).
FIRST USE 8-0-1954; IN COMMERCE
8-0-1954.

SER. NO. 73-292,412, FILED 1-9-1981.

CONNIE M. JUDGE, EXAMINING ATTORNEY

Int. Cl.: 25

Prior U.S. Cls.: 22 and 39

Reg. No. 2,075,427

United States Patent and Trademark Office

Registered July 1, 1997

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS PRESLEY

ELVIS PRESLEY ENTERPRISES, INC. (TEN-
NESSEE CORPORATION)
3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

FOR: CLOTHING, NAMELY, T-SHIRTS,
SWEATSHIRTS, SHORTS, CAPS, NECKWEAR,
JACKETS, COATS, BASEBALL SHIRTS AND
SOCKS, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 6-7-1982; IN COMMERCE
6-7-1987.

OWNER OF U.S. REG. NOS. 1,329,891, 1,953,600
AND OTHERS.

THE NAME IN THE MARK DOES NOT
IDENTIFY A PARTICULAR LIVING INDIVID-
UAL.

SER. NO. 75-095,787, FILED 4-29-1996.

KATHERINE STOIDES, EXAMINING ATTOR-
NEY

Int. Cl.: 34

Prior U.S. Cls.: 2, 8, 9 and 17

United States Patent and Trademark Office

Reg. No. 2,606,900

Registered Aug. 13, 2002

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS PRESLEY

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BOULEVARD
MEMPHIS, TN 38116

OWNER OF U.S. REG. NOS. 1,329,791, 2,061,619
AND OTHERS.

FOR: CIGARETTE LIGHTERS NOT OF PRECIOUS METAL, IN CLASS 34 (U.S. CLS. 2, 8, 9 AND 17).

THE MARK "ELVIS PRESLEY" DOES NOT IDENTIFY A PARTICULAR LIVING INDIVIDUAL.

SER. NO. 76-171,937, FILED 11-28-2000.

FIRST USE 12-1-1998; IN COMMERCE 12-1-1998.

KATHERINE STOIDES, EXAMINING ATTORNEY

Int. Cls.: 9 and 21

**Prior U.S. Cls.: 2, 13, 21, 23, 26, 29, 30, 33, 36, 38,
40 and 50**

Reg. No. 2,075,844

United States Patent and Trademark Office

Registered July 1, 1997

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS PRESLEY

ELVIS PRESLEY ENTERPRISES, INC. (TEN-
NESSEE CORPORATION)
3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

FOR: DECORATIVE REFRIGERATOR MAG-
NETS, COMPUTER PERIPHERAL MOUSE
PADS, COMPUTER KEYBOARDS, MUSICAL
JUKE BOXES, SUNGLASSES, TELEPHONES
AND MAGNETICALLY ENCODED DEBIT
CARDS, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36
AND 38).

FIRST USE 6-7-1982; IN COMMERCE
11-1-1987.

FOR: HOUSEWARES AND GLASS, NAMELY,
COMMEMORATIVE PLATES, EARTHEN-
WARE STORAGE JARS, COOKIE JARS,

COASTERS, NOT OF PAPER AND NOT BEING
TABLE LINEN, AND WIND CHIMES, IN
CLASS 21 (U.S. CLS. 2, 13, 23, 29, 30, 33, 40 AND
50).

FIRST USE 6-7-1982; IN COMMERCE
11-1-1987.

OWNER OF U.S. REG. NOS. 1,267,105, 1,677,378
AND OTHERS.

THE NAME IN THE MARK DOES NOT
IDENTIFY A PARTICULAR LIVING INDIVID-
UAL.

SER. NO. 75-163,210, FILED 9-4-1996.

KATHERINE STOIDES, EXAMINING ATTOR-
NEY

Int. Cl.: 25

Prior U.S. Cls.: 22 and 39

United States Patent and Trademark Office

Reg. No. 2,932,897

Registered Mar. 15, 2005

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS PRESLEY

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

FIRST USE 1-1-1995; IN COMMERCE 1-1-1995.

FOR: CLOTHING, NAMELY, MEN'S WOVEN SHIRTS, LOUNGEWEAR, SWIMWEAR, MEN'S WORK SHIRTS, ACTIVE WEAR, NAMELY, SHIRTS, PANTS, JEANS, JACKETS, COATS, UNDERWEAR AND SOCKS, ATHLETIC PANTS AND SHORTS, BOXER SHORTS AND FLEECE JACKETS, IN CLASS 25 (U.S. CLS. 22 AND 39).

THE NAME ELVIS PRESLEY DOES NOT IDENTIFY A LIVING INDIVIDUAL.

SER. NO. 78-316,864, FILED 10-22-2003.

LINDA POWELL, EXAMINING ATTORNEY

Int. Cl.: 18

Prior U.S. Cls.: 1, 2, 3, 22 and 41

Reg. No. 2,937,854

United States Patent and Trademark Office

Registered Apr. 5, 2005

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS PRESLEY

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)

3734 ELVIS PRESLEY BLVD.

MEMPHIS, TN 38116

FOR: PURSES, HANDBAGS AND COSMETIC BAGS SOLD EMPTY, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FIRST USE 3-1-2003; IN COMMERCE 3-1-2003.

OWNER OF U.S. REG. NOS. 2,075,427, 2,092,974 AND OTHERS.

THE NAME(S), PORTRAIT(S), AND/OR SIGNATURE(S) SHOWN IN THE MARK DOES NOT IDENTIFY A PARTICULAR LIVING INDIVIDUAL.

SER. NO. 78-316,943, FILED 10-22-2003.

LOURDES AYALA, EXAMINING ATTORNEY

Int. Cl.: 26

Prior U.S. Cls.: 37, 39, 40, 42 and 50

Reg. No. 2,955,078

United States Patent and Trademark Office

Registered May 24, 2005

**TRADEMARK
PRINCIPAL REGISTER**

Elvis Presley

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

FOR: CLOTH PATCHES FOR CLOTHING, ORNAMENTAL NOVELTY BUTTONS, EMBROIDERED EMBLEMS, BELT BUCKLES NOT MADE OF PRECIOUS METAL FOR CLOTHING AND EMBROIDERY AND CROSS STITCH KITS COMPRISED OF NEEDLES, THREAD, INSTRUCTIONS AND PATTERN CLOTH, IN CLASS 26 (U.S. CLS. 37, 39, 40, 42 AND 50).

FIRST USE 7-6-1992; IN COMMERCE 7-6-1992.

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

THE NAME ELVIS PRESLEY DOES NOT IDENTIFY A LIVING INDIVIDUAL.

SER. NO. 78-411,506, FILED 4-30-2004.

CHRISIE B. KING, EXAMINING ATTORNEY

Int. Cl.: 35

Prior U.S. Cls.: 100, 101 and 102

United States Patent and Trademark Office

Reg. No. 3,017,479

Registered Nov. 22, 2005

**SERVICE MARK
PRINCIPAL REGISTER**

ELVIS PRESLEY

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)

3734 ELVIS PRESLEY BLVD.

MEMPHIS, TN 38116

FOR: MAIL ORDER CATALOG SERVICES IN THE FIELD OF NOVELTY, GIFT, AND SOUVENIR ITEMS, IN CLASS 35 (U.S. CLS. 100, 101 AND 102).

FIRST USE 11-0-1985; IN COMMERCE 11-0-1985.

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

THE NAME ELVIS PRESLEY DOES NOT IDENTIFY A LIVING INDIVIDUAL.

SER. NO. 78-396,428, FILED 4-5-2004.

CHRISIE B. KING, EXAMINING ATTORNEY

Int. Cl.: 14

Prior U.S. Cls.: 2, 27, 28 and 50

Reg. No. 2,957,268

United States Patent and Trademark Office

Registered May 31, 2005

**TRADEMARK
PRINCIPAL REGISTER**

ELVIS PRESLEY

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)

3734 ELVIS PRESLEY BLVD.

MEMPHIS, TN 38116

FOR: NECKLACES, BODY JEWELRY, CHARMS, CUFF LINKS, BRACELETS AND WATCH BANDS, IN CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).

FIRST USE 5-12-1987; IN COMMERCE 12-12-1985.

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

THE NAME ELVIS PRESLEY DOES NOT IDENTIFY A LIVING INDIVIDUAL.

SER. NO. 78-396,470, FILED 4-5-2004.

CHRISIE B. KING, EXAMINING ATTORNEY

Int. Cl.: 28

Prior U.S. Cls.: 22, 23, 38 and 50

Reg. No. 2,935,071

United States Patent and Trademark Office

Registered Mar. 22, 2005

**TRADEMARK
PRINCIPAL REGISTER**

Elvis Presley

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BOULEVARD
MEMPHIS, TN 38116

FOR: PLUSH TOYS, IN CLASS 28 (U.S. CLS. 22, 23, 38 AND 50).

FIRST USE 2-1-1984; IN COMMERCE 2-1-1984.

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

ELVIS PRESLEY DOES NOT IDENTIFY A PARTICULAR LIVING INDIVIDUAL.

SER. NO. 78-384,524, FILED 3-15-2004.

SHAUNIA WALLACE, EXAMINING ATTORNEY

Int. Cl.: 6

Prior U.S. Cls.: 2, 12, 13, 14, 23, 25 and 50

Reg. No. 3,055,210

United States Patent and Trademark Office

Registered Jan. 31, 2006

**TRADEMARK
PRINCIPAL REGISTER**

Elvis Presley

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

FOR: METAL KEY CHAINS, METAL LICENSE PLATES AND NON-LUMINOUS AND NON-MECHANICAL METAL SIGNS AND TIN CANS SOLD EMPTY, IN CLASS 6 (U.S. CLS. 2, 12, 13, 14, 23, 25 AND 50).

FIRST USE 6-7-1982; IN COMMERCE 6-7-1982.

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

SER. NO. 78-567,948, FILED 2-15-2005.

SUE LAWRENCE, EXAMINING ATTORNEY

United States of America

United States Patent and Trademark Office

ELVIS PRESLEY

Reg. No. 3,722,364 ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
Registered Dec. 8, 2009 3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

Int. Cl.: 33 FOR: WINE, IN CLASS 33 (U.S. CLS. 47 AND 49).

TRADEMARK FIRST USE 12-31-2004; IN COMMERCE 12-31-2004.
PRINCIPAL REGISTER THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

OWNER OF U.S. REG. NOS. 1,340,617, 3,459,596 AND OTHERS.

THE NAME "ELVIS PRESLEY" DOES NOT IDENTIFY A LIVING INDIVIDUAL.

SER. NO. 77-771,013, FILED 6-30-2009.

ALLISON SCHRODY, EXAMINING ATTORNEY



David J. Kyfos

Director of the United States Patent and Trademark Office

United States of America

United States Patent and Trademark Office

ELVIS PRESLEY

Reg. No. 4,640,390

ABG EPE IP LLC (TENNESSEE LIMITED LIABILITY COMPANY)
100 WEST 33RD STREET, SUITE 1007
NEW YORK, NY 10001

Registered Nov. 18, 2014

Int. Cl.: 33

FOR: ALCOHOLIC BEVERAGES, EXCEPT BEERS, NAMELY, DISTILLED SPIRITS AND LIQUEURS, IN CLASS 33 (U.S. CLS. 47 AND 49).

TRADEMARK

FIRST USE 2-21-2014; IN COMMERCE 2-21-2014.

PRINCIPAL REGISTER

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

OWNER OF U.S. REG. NOS. 1,677,532, 3,722,364 AND OTHERS.

"ELVIS PRESLEY" DOES NOT IDENTIFY A LIVING INDIVIDUAL.

SER. NO. 86-235,662, FILED 3-28-2014.

TIFFANY CHIANG, EXAMINING ATTORNEY



Michelle K. Lee

Deputy Director of the United States
Patent and Trademark Office

United States of America

United States Patent and Trademark Office

ELVIS PRESLEY

Reg. No. 5,781,458

Registered Jun. 18, 2019

Int. Cl.: 3

Trademark

Principal Register

ABG EPE IP LLC (TENNESSEE LIMITED LIABILITY COMPANY)
1411 Broadway, 4th Floor
New York, NEW YORK 10018

CLASS 3: Hair conditioner; Hair pomades; Hair shampoo

FIRST USE 3-31-2016; IN COMMERCE 3-31-2016

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

OWNER OF U.S. REG. NO. 1674265, 1342551, 3719039

The name(s), portrait(s), and/or signature(s) shown in the mark does not identify a particular living individual.

SER. NO. 88-199,819, FILED 11-19-2018



Andrei Iancu

Director of the United States
Patent and Trademark Office

United States of America

United States Patent and Trademark Office

ELVIS PRESLEY

Reg. No. 6,009,467

Registered Mar. 10, 2020

Int. Cl.: 28

Trademark

Principal Register

ABG EPE IP LLC (DELAWARE LIMITED LIABILITY COMPANY)
Authentic Brands Group, LLC
1411 Broadway
New York, NEW YORK 10018

CLASS 28: Card games, board games, tabletop games, chess games, checkers games, poker chips, playing cards, puzzle games, video game machines, video game consoles, toy stuffed animals, plush toys, plastic character toys, novelty toy items in the nature of plastic candy dispensers designed as toys, toy figures, pet toys, dolls, playsets for dolls, doll clothing, paper dolls; artificial Christmas trees, Christmas tree ornaments, Christmas tree stands and Christmas tree skirts, balls for sports, bats for games; rackets for tennis, rackets for squash, rackets for racquetball, rackets for badminton and rackets for table tennis; jump ropes, exercise treadmills, gymnastic apparatus, skateboards, snowboards, surfboards, ice skates, roller skates, trampolines; athletic tape; grip tape for rackets, grip tape for golf clubs and grip tape for baseball bats; arm guards for athletic use, leg guards for athletic use and shin guards for athletic use; boxing gloves, punching bags, exercise weights; ankle weights, exercise wrist weights and leg weights for exercise; weight lifting belts and weight lifting gloves; weight lifting benches, kettle bells; floating recreational lounge chairs; arm floats for swimming, swim floats; inflatable float mattresses and pads for recreational use; inflatable inner tubes for aquatic recreational use; swim fins; swimming kick boards

FIRST USE 1-30-2019; IN COMMERCE 1-30-2019

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

OWNER OF U.S. REG. NO. 1329791, 2935071, 2943840

The name(s), portrait(s), and/or signature(s) shown in the mark does not identify a particular living individual.

SER. NO. 88-379,247, FILED 04-10-2019



Director of the United States
Patent and Trademark Office



United States of America

United States Patent and Trademark Office

JAILHOUSE ROCK

Reg. No. 3,821,600

Registered July 20, 2010

Int. Cl.: 33

TRADEMARK

PRINCIPAL REGISTER

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BOULEVARD
MEMPHIS, TN 38116

FOR: WINE, IN CLASS 33 (U.S. CLS. 47 AND 49).

FIRST USE 12-31-2005; IN COMMERCE 12-31-2005.

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

OWNER OF U.S. REG. NOS. 2,646,469, 3,238,136 AND OTHERS.

SER. NO. 77-890,821, FILED 12-10-2009.

MORGAN WYNNE, EXAMINING ATTORNEY



David J. Kyfos

Director of the United States Patent and Trademark Office

Int. Cl.: 16

Prior U.S. Cls.: 2, 5, 22, 23, 29, 37, 38 and 50

Reg. No. 2,158,251

United States Patent and Trademark Office

Registered May 19, 1998

**TRADEMARK
PRINCIPAL REGISTER**

KING OF ROCK N ROLL

ELVIS PRESLEY ENTERPRISES, INC. (TEN-
NESSEE CORPORATION)
3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

FIRST USE 0-0-1988; IN COMMERCE
0-0-1988.

SER. NO. 75-177,774, FILED 10-7-1996.

FOR: PRINTED MATTER, NAMELY, POST
CARDS, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29,
37, 38 AND 50).

JASON TURNER, EXAMINING ATTORNEY

Int. Cl.: 25

Prior U.S. Cls.: 22 and 39

Reg. No. 2,148,873

United States Patent and Trademark Office

Registered Apr. 7, 1998

**TRADEMARK
PRINCIPAL REGISTER**

KING OF ROCK N ROLL

ELVIS PRESLEY ENTERPRISES, INC. (TEN-
NESSEE CORPORATION)
3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

FIRST USE 6-7-1982; IN COMMERCE
6-7-1987.

SER. NO. 75-188,198, FILED 10-28-1996.

FOR: CLOTHING, NAMELY, T-SHIRTS,
SWEATSHIRTS, JACKETS, SOCKS, TIES, AND
SHORTS, IN CLASS 25 (U.S. CLS. 22 AND 39).

JASON TURNER, EXAMINING ATTORNEY

Int. Cls.: 20 and 26

Prior U.S. Cls.: 2, 13, 22, 25, 32, 37, 39, 40, 42 and 50

Reg. No. 2,633,795

United States Patent and Trademark Office

Registered Oct. 15, 2002

**TRADEMARK
PRINCIPAL REGISTER**

LONELY STREET

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BOULEVARD
MEMPHIS, TN 38116

FOR: STREET SIGNS AND LICENSE PLATES, IN CLASS 20 (U.S. CLS. 2, 13, 22, 25, 32 AND 50).

FIRST USE 7-19-1999; IN COMMERCE 7-19-1999.

FOR: NOVELTY PINS AND NOVELTY BUTTONS, IN CLASS 26 (U.S. CLS. 37, 39, 40, 42 AND 50).

FIRST USE 4-17-2002; IN COMMERCE 4-17-2002.

SER. NO. 75-709,706, FILED 5-19-1999.

KIMBERLY PERRY, EXAMINING ATTORNEY

United States of America

United States Patent and Trademark Office

LOVE ME TENDER

Reg. No. 3,747,631 ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
Registered Feb. 9, 2010 3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

Int. Cl.: 25 FOR: CLOTHING, NAMELY, COATS, JACKETS, JERSEYS, SWEATSHIRTS, SHIRTS, T-SHIRTS, PULLOVERS, VESTS, SHORTS, PANTS, SKIRTS, UNDERGARMENTS, LINGERIE, PAJAMAS, HEAD WEAR, HATS, CAPS, VISORS, BANDANNAS, SOCKS, GLOVES, SCARVES, WRISTBANDS, BELTS, FOOTWEAR, IN CLASS 25 (U.S. CLS. 22 AND 39).

**TRADEMARK
PRINCIPAL REGISTER**

FIRST USE 12-31-2006; IN COMMERCE 12-31-2006.

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

OWNER OF U.S. REG. NOS. 2,886,200 AND 3,442,767.

SN 77-609,262, FILED 11-6-2008.

COLLEEN DOMBROW, EXAMINING ATTORNEY



David J. Kyffers

Director of the United States Patent and Trademark Office

Int. Cl.: 25

Prior U.S. Cls.: 22 and 39

United States Patent and Trademark Office

Reg. No. 3,040,319

Registered Jan. 10, 2006

**TRADEMARK
PRINCIPAL REGISTER**

**TAKING CARE OF
BUSINESS**

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

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

FOR: CLOTHING, NAMELY T-SHIRTS, SWEATSHIRTS AND HATS, IN CLASS 25 (U.S. CLS. 22 AND 39).

SER. NO. 78-411,292, FILED 4-30-2004.

FIRST USE 10-1-1987; IN COMMERCE 10-1-1987.

CHRISTOPHER BUONGIORNO, EXAMINING ATTORNEY

United States of America

United States Patent and Trademark Office

TCB

Reg. No. 3,871,907

Registered Nov. 9, 2010

Int. Cl.: 25

TRADEMARK

PRINCIPAL REGISTER

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BOULEVARD
MEMPHIS, TN 38116

FOR: CLOTHING, NAMELY, SHIRTS, HATS, PANTS, COATS, JACKETS, T-SHIRTS, SWEATSHIRTS, SWIMWEAR, WORK SHIRTS, ATHLETIC PANTS, LOUNGE PANTS AND BOXER SHORTS; FLEECE JACKETS AND ACTIVE WEAR, NAMELY, SHIRTS, PANTS, JEANS, UNIFORMS, COATS, UNDERWEAR, T-SHIRTS, JACKETS AND SOCKS, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 1-1-2001; IN COMMERCE 1-1-2001.

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

OWNER OF U.S. REG. NOS. 1,228,406 AND 2,851,520.

SER. NO. 77-616,010, FILED 11-17-2008.

COLLEEN DOMBROW, EXAMINING ATTORNEY



David J. Kyfos

Director of the United States Patent and Trademark Office

Int. Cl.: 9

Prior U.S. Cls.: 21, 23, 26, 36, and 38

Reg. No. 2,851,520

United States Patent and Trademark Office

Registered June 8, 2004

**TRADEMARK
PRINCIPAL REGISTER**

TCB

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BOULEVARD
MEMPHIS, TN 38116

FIRST USE 1-1-2004; IN COMMERCE 1-1-2004.

SN 76-409,654, FILED 5-17-2002.

FOR: SUNGLASSES, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

BRIAN PINO, EXAMINING ATTORNEY

Int. Cl.: 14

Prior U.S. Cl.: 28

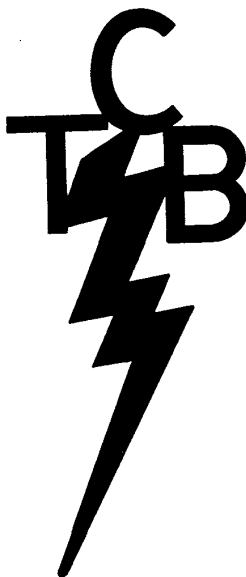
United States Patent and Trademark Office

Reg. No. 1,228,406

Registered Feb. 22, 1983

TRADEMARK

Principal Register



Estate and Trust of Elvis Presley (Tennessee estate
and trust)
3764 Elvis Presley Blvd.
Memphis, [Tenn. 37401](#)

For: JEWELRY, in CLASS 14 (U.S. Cl. 28).
First use Oct. 19, 1970; in commerce Oct. 19, 1970.
Owner of U.S. Reg. No. 1,178,535.

Ser. No. 242,279, filed Dec. 10, 1979.

R. G. COLE, Examining Attorney

Int. Cls.: 6 and 9

Prior U.S. Cls.: 2, 12, 13, 14, 21, 23, 25, 26, 36, 38, and 50

Reg. No. 2,559,580

United States Patent and Trademark Office

Registered Apr. 9, 2002

**TRADEMARK
PRINCIPAL REGISTER**

TEDDY BEAR

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BOULEVARD
MEMPHIS, TN 38116

FOR: MAGNETS, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 11-17-1999; IN COMMERCE 11-17-1999.

FOR: METAL KEY CHAINS, IN CLASS 6 (U.S. CLS. 2, 12, 13, 14, 23, 25 AND 50).

SN 75-804,920, FILED 9-22-1999.

FIRST USE 11-17-1999; IN COMMERCE 11-17-1999.

WON TEAK OH, EXAMINING ATTORNEY

United States of America
United States Patent and Trademark Office

THE KING

Reg. No. 4,641,410

Registered Nov. 18, 2014

Int. Cls.: 14 and 16

TRADEMARK

PRINCIPAL REGISTER

ABG EPE IP LLC (DELAWARE LIMITED LIABILITY COMPANY)
100 WEST 33RD STREET, SUITE 1007
NEW YORK, NY 10001

FOR: JEWELRY, IN CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).

FIRST USE 1-1-2014; IN COMMERCE 1-1-2014.

FOR: ADDRESS BOOKS, HOLIDAY/GREETING CARDS, ART PRINTS, GRAPHIC AND PRINTED ART REPRODUCTIONS, PAPER GIFT BAGS, WRITING INSTRUMENTS, LOOSE LEAF BINDERS, BOOKENDS, NON-FICTION AND REFERENCE BOOKS ABOUT THE GRACELAND MANSION AND ELVIS PRESLEY, CHILDREN'S ACTIVITY BOOKS, GIFT WRAPPING PAPER, BUMPER STICKERS, CALENDARS, CREDIT CARDS WITHOUT MAGNETIC CODING, NONMAGNETICALLY ENCODED TELEPHONE CALLING CARDS, BANK CHECKS, DEBIT GIFT CARDS WITHOUT MAGNETIC CODING, CHECKBOOK COVERS, COMIC BOOKS, COMMEMORATIVE STAMP SHEETS THAT ARE NOT ISSUED BY THE US POSTAL OFFICE, DECALS, LETTER OPENERS, PAPER MERCHANDISE BAGS, PICTURES, PHOTOGRAPHIC PRINTS, PICTURE BOOKS, RECIPE BOOKS, RUBBER STAMPS, STATIONERY, STICKERS, TEMPORARY TATTOOS, TRADING CARDS, CHALK BOARDS FOR HOME AND/OR SCHOOL USE, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 1-1-2014; IN COMMERCE 1-1-2014.

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

THE "KING" DOES NOT IDENTIFY A LIVING INDIVIDUAL.

SN 77-776,300, FILED 7-8-2009.

TIMOTHY FINNEGAN, EXAMINING ATTORNEY



Michelle K. Lee

Deputy Director of the United States
Patent and Trademark Office

United States of America
United States Patent and Trademark Office

THE KING

Reg. No. 4,529,779

Registered May 13, 2014

Int. Cl.: 9

TRADEMARK

PRINCIPAL REGISTER

ABG EPE IP LLC (DELAWARE LIMITED LIABILITY COMPANY)
100 WEST 33RD STREET, SUITE 1007
NEW YORK, NY 10001

FOR: DOWNLOADABLE RING TONES, GAMES, AND GRAPHICS FOR MOBILE PHONES; MOBILE PHONE ACCESSORIES, NAMELY, CELL PHONE FACEPLATES AND CELL PHONE COVERS; PRE-RECORDED VIDEO CASSETTES, AUDIO TAPES, CDS AND DVDS FEATURING OR ASSOCIATED WITH CELEBRITIES AND PUBLIC FIGURES; SUNGLASSES; COMPUTER GAME SOFTWARE AND ONLINE DOWNLOADABLE COMPUTER GAME PROGRAMS; VIDEO GAME SOFTWARE; VIDEO GAME DISCS, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 4-1-2013; IN COMMERCE 4-1-2013.

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

THE "KING" DOES NOT IDENTIFY A LIVING INDIVIDUAL.

SN 77-983,584, FILED 7-8-2009.

TIMOTHY FINNEGAN, EXAMINING ATTORNEY



Michelle K. Lee

Deputy Director of the United States
Patent and Trademark Office

United States of America

United States Patent and Trademark Office

THE KING OF ROCK 'N ROLL

Reg. No. 3,932,232

Registered Mar. 15, 2011

Int. Cl.: 33

TRADEMARK

PRINCIPAL REGISTER

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BOULEVARD
MEMPHIS, TN 38116

FOR: WINE, IN CLASS 33 (U.S. CLS. 47 AND 49).

FIRST USE 4-15-2010; IN COMMERCE 4-15-2010.

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

OWNER OF U.S. REG. NOS. 2,145,957, 2,895,756, AND 3,004,117.

SN 77-890,883, FILED 12-10-2009.

MORGAN WYNNE, EXAMINING ATTORNEY



David J. Kyfos

Director of the United States Patent and Trademark Office

Int. Cl.: 18

Prior U.S. Cls.: 1, 2, 3, 22 and 41

Reg. No. 2,895,756

United States Patent and Trademark Office

Registered Oct. 19, 2004

**TRADEMARK
PRINCIPAL REGISTER**

THE KING OF ROCK 'N' ROLL

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

FIRST USE 9-1-2003; IN COMMERCE 9-1-2003.

SER. NO. 78-312,835, FILED 10-13-2003.

FOR: HAND BAGS, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

JUDITH GRUNDY, EXAMINING ATTORNEY

Int. Cl.: 25

Prior U.S. Cls.: 22 and 39

United States Patent and Trademark Office

Reg. No. 3,583,778

Registered Mar. 3, 2009

**TRADEMARK
PRINCIPAL REGISTER**

VIVA LAS VEGAS

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

FOR: CLOTHING, NAMELY, COATS, JACKETS, JERSEYS, SWEATSHIRTS, SHIRTS, T-SHIRTS, PULLOVERS, VESTS, SHORTS, PANTS, SKIRTS, UNDERGARMENTS, LINGERIE, PAJAMAS, HEAD WEAR, HATS, CAPS, VISORS, BANDANNAS, SOCKS, GLOVES, SCARVES, WRISTBANDS, BELTS, FOOTWEAR, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 6-30-2003; IN COMMERCE 6-30-2003.

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

SN 77-026,612, FILED 10-22-2006.

CHARLOTTE CORWIN, EXAMINING ATTORNEY

United States of America

United States Patent and Trademark Office

VIVA LAS VEGAS

Reg. No. 3,793,445

Registered May 25, 2010

Int. Cl.: 9

TRADEMARK

PRINCIPAL REGISTER

ELVIS PRESLEY ENTERPRISES, INC. (TENNESSEE CORPORATION)
3734 ELVIS PRESLEY BLVD.
MEMPHIS, TN 38116

FOR: PRERECORDED AUDIO AND AUDIO/VISUAL MEDIA, NAMELY, PRERECORDED COMPACT DISCS, AUDIO CASSETTES, VIDEOCASSETTES, DVDS AND PHONOGRAPH RECORDS FEATURING AUDIO-VISUAL PROGRAMMING, NAMELY, ENTERTAINMENT, MUSIC VIDEOS, MOVIES, AND DOCUMENTARIES; DOWNLOADABLE MP3 FILES FEATURING MUSIC; MOTION PICTURE FILMS RELATED TO ENTERTAINMENT, MUSIC AND/OR MUSICAL ARTISTS; MULTIMEDIA SOFTWARE RECORDED ON CD-ROM FEATURING ENTERTAINMENT, MUSIC AND/OR MUSICAL ARTISTS; COMPUTER SOFTWARE FOR USE AS A SCREEN SAVER; VIDEO GAME CARTRIDGES, DISCS, SOFTWARE AND JOYSTICKS FEATURING ENTERTAINMENT AND/OR MUSIC, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 8-1-2008; IN COMMERCE 8-1-2008.

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

SN 77-027,387, FILED 10-23-2006.

CHARLOTTE CORWIN, EXAMINING ATTORNEY



David J. Kyfos

Director of the United States Patent and Trademark Office

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ABG EPE IP LLC,

Plaintiff,

v.

a78808908, et al.,

Defendants.

Civil Action No.

DECLARATION OF KEVIN CLARKE

I, Kevin Clarke, do hereby declare that the following facts are true and accurate to the best of my knowledge, information, and belief.

1. I am over eighteen (18) years old and am fully competent to attest to the matters stated herein.

2. I am Chief Financial Officer for Authentic Brands Group, LLC (“ABG”) and its subsidiary, ABG EPE IP LLC.

3. ABG is a brand management company that owns and/or controls the rights to over fifty (50) well-known brands for personalities such as ELVIS PRESLEY, MARILYN MONROE, MUHAMMAD ALI, and others as well as retail and fashion brands such as AEROPOSTALE, AIRWALK, BARNEYS NEW YORK, BROOKS BROTHERS, FOREVER 21, and numerous others.

I. BACKGROUND

4. Plaintiff, ABG EPE IP LLC (“ABG EPE”) is a limited liability company organized under the laws of Tennessee. Effective November 18, 2013, ABG EPE purchased all intellectual property, including all trademark rights of Elvis Presley’s estate and is current owner of the global trademark portfolio of the late Elvis Presley. ABG EPE is a subsidiary of ABG.

5. Elvis Presley (“Elvis”), an iconic American musician, singer, and actor, is a household name around the world.

6. Known as the “King of Rock ‘n’ Roll,” Elvis has sold over one billion records worldwide, had over 150 albums and singles certified gold, platinum, and multi-platinum, had 53 Top 40 albums on the Billboard Top 200 chart, won three Grammy[®] Awards for gospel music, holds the record for Most Top 40 hits (at 114 total), has been inducted into the Rock ‘n’ Roll, Country, Gospel, Rockabilly, and R&B Halls of Fame, and starred in 31 feature films.

II. ELVIS’S TRADEMARKS

7. ABG EPE owns hundreds of registered and common law trademarks (the “ELVIS Marks”) including ELVIS, ELVIS PRESLEY, JAILHOUSE ROCK, BLUE SUEDE, KING OF ROCK N ROLL, LOVE ME TENDER, and many others.

8. The ELVIS Marks cover everything from wine, to clothing, to recorded music, to jewelry, to handbags, to keychains, to street signs and license plates, and nearly everything in between.

9. True and correct copies of United States Federal trademark registrations for the ELVIS Marks are attached collectively as Exhibit A to the complaint.

III. EFFORTS TO COMBAT COUNTERFEITERS AND INFRINGERS

10. Due to Elvis's worldwide reputation, Elvis products are subject to frequent counterfeiting. Many third parties use the ELVIS Marks, both online and offline, without authorization on or in connection with the advertising and sale of a variety of products. The sale of unauthorized products bearing counterfeit and/or infringing copies of the ELVIS Marks poses a real threat to Elvis's brand, the sustainability of ABG EPE's business, and to the individuals and companies who unwittingly purchase them.

11. Unauthorized products bearing counterfeit and/or infringing marks are not required to comply with federal safety or labeling standards. Moreover, these products do not meet ABG EPE's quality standards, thus eroding the brand's valuable reputation and goodwill. If consumers are dissatisfied with the quality of the counterfeit product they purchase, that displeasure will be attributed to Elvis's

brand. The availability of counterfeit products also costs ABG EPE considerable lost sales and harms our relationships with ABG EPE's authorized licensees. Unauthorized use of the ELVIS Marks also devalues the brand and corrodes ABG EPE's exclusive rights in the ELVIS Marks.

12. ABG EPE frequently uses standard notice and takedown procedures to remove counterfeit and/or infringing goods from the Internet. Despite these efforts, counterfeit and infringing products continue to be readily available through major e-commerce marketplaces, including but not limited to: Alibaba, AliExpress, DHGate, Joom, and Wish (each a "Marketplace" and collectively the "Marketplaces"). Based on what I have been told, the Marketplace intellectual property rights ("IPR") notice and takedown mechanisms have not been fully effectual in our continuing fight against the marketing and sale of counterfeit products bearing the ELVIS Marks.

IV. IDENTIFYING COUNTERFEITERS AND INFRINGERS

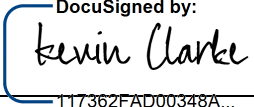
13. We can typically identify counterfeit versions of our products by visual inspection, including the type, labeling, packaging materials, and/or price at which the products are sold. With the assistance of The Sladkus Law Group, it has been confirmed that each Defendant is selling non-genuine products bearing one or more marks that are identical or confusingly similar to at least one of our ELVIS Marks. None of the Defendants is, or has ever been, authorized to manufacture or distribute

any Elvis products, and ABG EPE has never licensed any of the Defendants to use any of the ELVIS Marks.

[Signature on Following Page]

DECLARATION

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States that the foregoing facts are true and correct to the best of my knowledge, information, and belief, and that I signed this declaration on the date set forth below.

By: 
117362FAD00348A...

Date: 4.14.2021

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ABG EPE IP, LLC,

Plaintiff,

v.

a78808908, et al.,

Defendants.

Civil Action No.

DECLARATION OF JEFFREY B. SLADKUS

I, Jeffrey B. Sladkus, declare and state as follows:

I. Background

1) The following Declaration is made on my personal knowledge and information, as well as my review of relevant documents, and, if called upon to do so, I could and would capably testify to the following facts set forth below.

2) I am an attorney duly authorized and licensed to practice law in the State of Georgia. I have been practicing as a trademark and copyright attorney since at least as early as 2001, and I am the Managing Partner of The Sladkus Law Group, counsel of record for ABG EPE IP, LLC (“Plaintiff”) in the above captioned action.

3) I have represented, and continue to represent, numerous owners of well-known brands against sellers of counterfeit and infringing products.

4) Online sales of counterfeit and infringing goods are a major problem for these brand owners. I have been retained by Plaintiff to help locate and pursue merchants on some of the most popular e-commerce marketplaces, such as Alibaba, AliExpress, DHgate, Amazon, Ebay, Joom, and/or Wish (“Marketplaces”), that are selling unauthorized copies of Plaintiff’s goods bearing counterfeit or infringing marks.

5) I routinely engage and assist in the enforcement of my clients’ IP rights against counterfeiters, including by registering copyrights and trademarks with U.S. Customs and Border Protection (“CBP”), assisting CBP with the identification, review, and seizure of counterfeit goods, sending demand letters directly to infringers and internet service providers, filing domain name disputes against infringing websites, assisting with or utilizing the notice-and-takedown procedures for social media platforms such as Facebook, and assisting with or utilizing notice-and-takedown procedures to report intellectual property right (“IPR”) infringements directly to the Marketplaces.

II. Investigation of Defendants

6) There are currently scores of virtual storefronts operating on the various Marketplaces selling counterfeit or infringing goods bearing the Plaintiff's Marks. The Marketplaces allow individuals or companies to establish these virtual storefronts where they can then market, sell, and ship a variety of goods to consumers in the United States (each a "Store").

7) On behalf of Plaintiff, I personally investigated the marketing, promotion, and offering for sale of counterfeit and/or infringing goods in the various Marketplaces by Defendants. Each Defendant has advertised and overtly offered for sale to prospective purchasers in the United States unauthorized goods bearing counterfeit and/or infringing copies of Plaintiff's Marks. Using a suitable pretext, our firm searched for Plaintiff's branded goods on the various Marketplaces, identified Stores advertising merchandise bearing counterfeit and/or infringing copies of Plaintiff's Marks, and confirmed that each of the Stores was willing and able to ship these counterfeit and/or infringing goods to the United States. Each of the Marketplaces accepts payment on behalf of the Stores for these goods in U.S. dollars, as further discussed below. Each Defendant advertised its willingness and ability to sell these counterfeit and infringing goods to customers in this judicial district, thereby purposefully directing its commercial activities

here. In fact, Stores will frequently feature “customer feedback” sections that specifically highlight reviews based on sales made to customers in the United States.

8) As part of the investigative process, my firm has assembled web page captures evidencing each Defendant’s offer for sale and/or sale of goods bearing counterfeit and/or infringing copies of one or more of Plaintiff’s Marks. The web page captures also establish each Defendant’s marketing, offering for sale, and offering to ship these counterfeit and/or infringing goods to consumers in the United States, together with images of the counterfeit and/or infringing goods that were prominently displayed by Defendants as sample goods in their Stores. Many of the Stores use the identical pictures and descriptions to advertise the sale of their counterfeit and/or infringing goods. This evidence can and will be made available to the Court upon request; the volume and electronic file size makes it impracticable to file it through the Court’s CM/ECF platform.

9) Alibaba.com (“Alibaba”) and AliExpress.com (“AliExpress”) are owned by Alibaba Group Holding Limited (“AGHL”). Based on my research, I understand that all sales made by Alibaba and AliExpress sellers are processed by Ant Group (formerly known as AliPay and Ant Financial) doing business as AliPay (“AliPay”), which is an affiliate of AGHL. Based on my research, I

understand that AliPay US, Inc. is the agent of AliPay and is authorized to accept and process all payments for buyers located in the U.S.

10) Merchants operating through the Wish.com Marketplace have their payments processed through an aggregate escrow account in the name of ContextLogic Inc. d/b/a WISH, which operates the Wish.com Marketplace. Merchants selling goods through the DHGate Marketplace have their payments processed by DHPay, which is owned by Camel Financial, Inc. (“Camel Financial”). I further understand that merchants selling through the Amazon.com Marketplace have their payments processed by Amazon Payments and that merchants selling through the Ebay Marketplace primarily utilize PayPal. The Joom Marketplace accepts a variety of payment types, including credit cards and PayPal, and processes those payments on behalf of the merchants and consumers using the platform.

11) Based on my first-hand knowledge of similar cases I have prosecuted, Marketplaces such as Alibaba, AliExpress, DHGate, Amazon, Ebay, Joom, and Wish, for example, can and will in fact comply with a temporary restraining order of the type requested by Plaintiff.

III. Need for Ex Parte Relief and Service by Electronic Means

12) The Marketplaces usually provide a mechanism for reporting intellectual property rights (“IPR”) infringement. However, the current notice-and-takedown procedures in place by the various Marketplaces to report IPR infringements are an exercise in smoke and mirrors. While these procedures have been instituted by Marketplaces to lead IPR owners to believe that the Marketplaces are taking real and affirmative steps to curb the sale of counterfeiting and/or infringing goods, in reality, these takedowns result in nothing more than a slap on the wrist and a minor inconvenience for the sellers.

13) In my experience, a Marketplace will usually take infringing products down within one week of receipt of a notice of an IPR infringement. However, there are no real penalties or restrictions imposed upon the seller, and, invariably, the seller often will quickly relist the infringing and/or counterfeit goods on the same Store or establish a new Store under a new identity and resume selling the infringing and/or counterfeit goods. If a Marketplace bans a particular seller because of repeat IPR infringement complaints, the seller can easily establish a new identity, set up a new Store, and resume selling counterfeit and/or infringing goods on the Marketplace in little time.

14) The persistent nature of online counterfeiting and long-term ineffectiveness of standard notice-and-takedown procedures is well documented. Referred to colloquially as the “whack-a-mole” problem, once an infringing listing is taken down pursuant to a takedown notice, another infringing listing tends to “pop-up” to take its place.¹ Thus, rights holders are faced with either perpetually sending takedown notices or resigning themselves to the pervasiveness of the infringement.

15) Most Marketplace sellers do not provide complete or accurate physical contact information regarding themselves or their Store. Some Marketplaces allow sellers to operate with complete anonymity and do not disclose any information about the seller or the Store whatsoever.

¹ See e.g. Gaston Kroub, *Mass Counterfeiting Whack-a-Mole*, Above the Law, Jan. 21, 2020, <https://abovethelaw.com/2020/01/mass-counterfeiting-whack-a-mole/>; Kimball, Spencer, *US small businesses are fighting an uphill battle against counterfeiters in China: ‘It’s like whack-a-mole’*, CNBC, Oct. 9, 2019, <https://www.cnbc.com/2019/10/06/how-us-small-businesses-are-fighting-counterfeiting-in-china.html>; Taylor, Ken, *Member Spotlight: Adobe Inc. Focuses Corporate Social Responsibility Efforts on Education, Environment, and Community*, International Trademark Association (INTA), Jan. 15, 2020, <https://www.inta.org/member-spotlight-adobe-inc-focuses-corporate-social-responsibility-efforts-on-education-environment-and-community/>; Hsiao, Amy, *Fighting Online Counterfeits in China – Tips to Avoid a “Whack-a-Mole” Game*, Last Week in China, Jan. 31, 2020, <https://www.lastweekinchina.com/home/fighting-online-counterfeits-in-china>; Ray, James, *Trademark Enforcement: A more nuanced game than whack-a-mole*, IP Watchdog, Oct. 23, 2018, <https://www.ipwatchdog.com/2018/10/23/trademark-enforcement-whack-a-mole/id=102344/>; Mostert, Dr. Frederick, *Study on Approaches to Online Trademark Infringements*, World Intellectual Property Organization (WIPO) Advisory Committee on Enforcement, Sep. 1, 2017, https://www.wipo.int/edocs/mdocs/enforcement/en/wipo_ace_12/wipo_ace_12_9_rev_2.pdf.

16) I have sent countless demand letters to substantially similar merchants located in China. These merchants rarely, if ever, publish an accurate identity, physical address, or other contact information. Moreover, when they do purport to provide a business address, it is usually either incomplete or false. In my many years of representing IPR owners, I have yet to receive a response to a demand letter sent to an individual or company in China that was sent to the published address.

17) The contact information typically published by a seller in any Marketplace is rarely complete, and while the published information might lead to a certain city or region in China, there is rarely, if ever, the type of specific physical location information required to successfully effectuate personal service, let alone deliver a demand letter. I have also been informed by AliExpress that they do not have and, therefore, cannot provide the actual name and physical address of the sellers associated with any Store.

18) With such anonymity, sellers like Defendants are then able to market, advertise, and sell counterfeit and infringing goods without any risk of an adverse judgment. This also allows sellers like Defendants to destroy any evidence of their unlawful conduct and to transfer or withdraw funds in the event of a legal proceeding.

19) Additionally, counterfeiters routinely monitor electronic court dockets for new anti-counterfeiting actions and communicate with sellers like Defendants through various social networks and message forums, including sellerdefense.cn, alerting these sellers to pending actions and affording these sellers the opportunity to take down their existing Store, empty Marketplace escrow accounts, and destroy all evidence of their counterfeiting activity before a TRO or asset freeze can be put in place.

20) This firm has discovered that counterfeiters have begun monitoring electronic court dockets specifically for filings from The Sladkus Law Group, in an effort to learn of potential anti-counterfeiting actions before a plaintiff's motion for TRO can be heard by the Court. Counterfeiters then share information and details from initial court filings with other sellers and provide one another with directions and instructions on counter-measures to evade account freezes and protect funds obtained from the sale of counterfeit goods. Examples of counterfeiters' communications through sellerdefense.cn related to one of our firm's recent cases are attached hereto as Exhibit 1.

21) Therefore, due to the incomplete public information and/or virtual anonymity afforded to these sellers, coupled with these sellers' capacity for monitoring electronic dockets to obtain advance notice of pending litigation,

successfully shutting down these sellers and affording an aggrieved party the opportunity to obtain some type of remedy under the prevailing U.S. trademark laws requires that the target remains unaware that they are the subject of anti-counterfeiting measures; otherwise, the second one of these sellers catches wind of an investigation, they will disappear without a trace.

22) Counterfeiters who are made aware of pending legal action are known to abscond with their counterfeit goods and/or other assets to avoid liability. Our clients have experienced this first-hand. For example, one of our clients pursued a counterfeiter for years across various cities in China. When the client's representatives originally started to close in on him and/or the factories he was using to make the counterfeit products, they were unable to find him, and the factories claimed that they were bankrupt and that the machines used to make the counterfeit products were gone. Years later, the same counterfeiter was found in a new city in China manufacturing counterfeit products at a new facility. He was eventually apprehended by law enforcement officers. However, in the time that he was missing, our client estimates that around 500,000 counterfeit products were distributed.

23) In a different matter, one of our clients pursued two individuals and brought civil claims against them in China. The matter ultimately settled, and the

individuals agreed to cease their infringement. However, a few months later, the same individuals were found to be engaging in the same counterfeiting activity. A Chinese Court ordered seizure of their bank accounts, but the accounts were eventually released. When our client tried to obtain the previously seized funds, the money was gone.

24) These experiences are not unique. These types of evasive activities are well documented. It is exactly because of counterfeiters' tendency to disappear and destroy evidence that the Lanham Act was amended to provide for *ex parte* seizure orders under 15 U.S.C. § 1116.²

² Joint Statement on Trademark Counterfeiting Legislation Part G, 130 Cong. Rec. H12076, H12078 (daily ed. Oct. 10, 1984) ("Testimony before both the House and Senate Judiciary Committees established that many of those who deal in counterfeits make it a practice to destroy or transfer counterfeit merchandise when a day in court is on the horizon. The ex parte seizure procedure is intended to thwart this bad faith tactic"), available at <https://www.justice.gov/archives/jm/criminal-resource-manual-1711-joint-statement-part-g-ex-parte-seizures>. See also e.g. Lucas G. Paglia & Mark A. Rush, *End Game: The Ex Parte Seizure Process and the Battle Against Bootleggers*, 4 VAND. J. ENT. L. & PRAC. 4, 5 (2002) ("If apprised in advance of a pending motion for injunction, counterfeiters invariably leave with their illicit merchandise and either relocate to a venue beyond the jurisdiction of the court or simply wait until their pursuers have abandoned the cause before restarting their illegal businesses."); Steven N. Baker and Matthew Lee Fesak, *Who Cares About the Counterfeiters? How the Fight Against Counterfeiting Has Become an In Rem Process*, 83 St. John's Law Review 735 (2009), ("Counterfeiters . . . would often destroy any counterfeit goods in their possession the moment they were placed on notice of legal proceedings[.]") available at <https://scholarship.law.stjohns.edu/cgi/viewcontent.cgi?article=1053&context=lawreview>.

25) I have only ever received responses to demand letters sent to merchants in China after I emailed a copy of the correspondence to the infringer – and only when a valid email address has been provided.

26) Based on my first-hand knowledge of similar cases I have prosecuted, the overwhelming majority of the defendants in these cases are able to be successfully served with process and other documents via the email addresses on file with the Marketplaces and/or through the Marketplaces' built-in messaging systems. Generally, almost immediately after being served electronically via either of those two methods, the majority of the defendants contact us either directly or through counsel to try to settle the lawsuit.

27) Additionally, the Marketplaces themselves advise the defendants of the lawsuit, temporary restraining order, and asset freeze when removing the offending product listings. Thus, even in the rare instances when one of our formal service emails is returned as “undeliverable,” we are confident that the defendant at issue has received notice of the lawsuit and Court orders. Indeed, we are often contacted by the defendant or his/her counsel to try to resolve the dispute.

28) The above demonstrates that the most effective and reliable way to communicate with these defendants is electronically, via the email addresses on file with the Marketplaces and/or through the Marketplaces themselves.

I declare under penalty of perjury that the foregoing is true and correct, and that I signed this Declaration on the date set forth below.

A handwritten signature in black ink, reading "Jeffrey Sladkus". The signature is written in a cursive style with a large, stylized "J" and "S".

Jeffrey B. Sladkus

Ga. Bar No. 651220

Date: January 5, 2022

Exhibit 1

.wpb_animate_when_almost_visible {opacity: 1;}

List of cases

Brand Library

Case representation



Law Firm Information

Trademark registration

common problem

other

EMERGENCY REMOVAL! THE NEW BRAND BIG GREEN EGG IS SECRETLY FROZEN, PLEASE CASH IT OUT AS SOON AS POSSIBLE!

Home page / SLADKUS / Emergency removal! ...

 Post Views: 405

New brand! Some AliExpress sellers reported that they received the TRO temporary freezing order from THE SLADKUS LAW GROUP. The case number is displayed as 20-cv-4757, but there is no brand-related information.

Another hidden case began to freeze, but SellerDefense deduced from the seller's complained product pictures that it was the brand **Big Green Egg**. We gave you a warning as early as the end of last year!

(Review in the past: The [hidden case has begun to freeze, and a new brand infringement warning is attached. Hurry up and remove it and withdraw it in time!](#))

Case parameters

Case No.: 20-cv-4757

Time of Prosecution: 2020/11/20

Freeze Time: Around 2021/3/18

Plaintiff Company: The Big Green Egg, Inc

Acting Law Firm: THE SLADKUS LAW GROUP



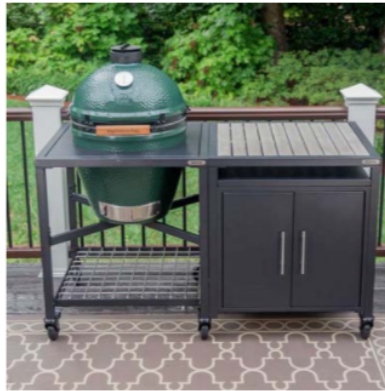
There was almost four months between the prosecution and the freezing of this case, and it had been in a hidden state before, without knowing any information.

Big Green Egg

It mainly involves a series of barbecue-related products, such as barbecue racks, lighting equipment used for barbecues, and special barbecue gloves.

Official website: <https://biggreenegg.com/>

Latest and Greatest



EGGspander 5 Piece Kit for Large EGG

★★★★★ 7 reviews

SKU: 120762

FIND A DEALER

Trademark

The word mark Big Green Egg has a large number of registered categories, and even includes 025 auxiliary shoes and hats:



BIG GREEN EGG

Word Mark BIG GREEN EGG

Goods and Services IC 011. US 013 021 023 024 031 034. G & S: Covers for barbecue smokers and grills; cooking grids for barbecue smokers and grills; cooking for lighting propane grills, fireplaces and candles; stands, tables and frames for barbecue smokers and grills; carriers for barbecue smokers and pan for barbecue grills and smokers; cooking grates adapted for barbecue smokers and grills. FIRST USE: 20030000. FIRST USE IN COMMERCE: 20030000

IC 016. US 002 005 022 023 029 037 038 050. G & S: Cook books. FIRST USE: 20100100. FIRST USE IN COMMERCE: 20100100

IC 020. US 002 013 022 025 032 050. G & S: Inflatable figures for use as indoor or outdoor decoration; inflatable publicity objects. FIRST USE: 20030000. FIRST USE IN COMMERCE: 20030000

IC 021. US 002 013 023 029 030 033 040 050. G & S: Barbecue mitts and gloves; kitchen mitts and gloves; oven mitts and gloves; pots pans; basting brushes, racks, cooking skewers, grid cleaners, ash tools, grill brushes, extenders, plate setters, baking stones, corn holders, meat roasting racks, barbecue grills. FIRST USE: 20030000. FIRST USE IN COMMERCE: 20030000

IC 024. US 042 050. G & S: Towels; banners and flags of textile; plastic banners; vinyl banners. FIRST USE: 20030000. FIRST USE IN COMMERCE: 20030000

IC 025. US 022 039. G & S: Aprons; clothing, namely, shirts, t-shirts, baby onesies, baby bodysuits, vests, pullovers, hoodies, sweatshirts; hats.

Standard Characters Claimed
Mark

Drawing Code (4) STANDARD CHARACTER MARK

Serial Number 90342981

Filing Date November 25, 2020

Current Basis 1A

Original Basis 1A

Brand Logo pattern:


Word Mark BIG GREEN EGG

Goods and Services IC 011. US 013 021 023 031 034. G & S: Barbecue smokers and grills. FIRST USE: 20110300. FIRST USE IN COMMERCE: 20110300

Mark Drawing Code (3) DESIGN PLUS WORDS, LETTERS, AND/OR NUMBERS

Design Search Code 13.03.01 - Barbeque grills ; Grills, barbeque ; Hibachi

Serial Number 85258049

Filing Date March 4, 2011

Current Basis 1A

Original Filing Basis 1B

Published for Opposition October 9, 2012

Registration Number 4263121

International Registration Number 1305379

Registration Date December 25, 2012

Owner (REGISTRANT) The Big Green Egg, Inc. CORPORATION GEORGIA 3786 DeKalb Tech Parkway Atlanta GEORGIA 30340

Attorney of Record Dana A. Schwind

Prior Registrations 2627587;3046614

Description of Mark The color(s) green, black, brown, gray, beige and white is/are claimed as a feature of the mark. The mark consists of the word "Big Green Egg" in a stylized font next to a green ceramic egg-shaped grill with a black handle. The top portion, gray is on the label at the bottom and beige and white are on the inside of the grill.

Type of Mark TRADEMARK

Register PRINCIPAL

Affidavit Text SECT 15. SECT 8 (6-YR).

Live/Dead Indicator LIVE



Goods and Services IC 011. US 013 021 023 031 034. G & S: barbecue smokers and grills. FIRST USE: 19740000. FIRST USE IN COMMERCE: 197

Mark Drawing Code (2) DESIGN ONLY

Design Search Code 13.03.01 - Barbeque grills ; Grills, barbeque ; Hibachi
29.02.06 - Green (single color used for the entire goods/services)

Serial Number 86489386

Filing Date December 23, 2014

Current Basis 1A

Original Filing Basis 1A

Published for Opposition December 29, 2015

Registration Number 4917107

Registration Date March 15, 2016

Owner (REGISTRANT) The Big Green Egg, Inc. CORPORATION GEORGIA 3786 DeKalb Tech Parkway Atlanta GEORGIA 30340

Attorney of Record Dana A. Schwind

Description of Mark The color(s) green is/are claimed as a feature of the mark. The mark consists of the color green applied to a three dimensional co indicate placement of the mark on the goods and are not part of the mark.

Type of Mark TRADEMARK

Register PRINCIPAL-2(F)

Live/Dead Indicator LIVE

All other word marks registered by the plaintiff's company cannot be used directly:

	Serial Number	Reg. Number	Word Mark
1	90342981		BIG GREEN EGG
2	88928189		GRILLERTAINMENT
3	88876501		SPEEDICLEAN
4	87062622	5944432	EXPERIENCE A WORLD OF FLAVOR
5	87017587	5944421	OPEN A WORLD OF FLAVOR
6	86253434	4737783	NEST
7	86180596	4596813	EGGZILLA
8	86890091	5088364	KULINARY KAMADO
9	86822842	5051309	COMFORT TIE
10	86765649	5024078	EGGMITT
11	86691073	5050932	EGGNITER
12	86524219	5013740	THE ULTIMATE GRILLING EXPERIENCE
13	86489386	4917107	
14	86335511	4902538	MINIMAXEGG
15	86253427	4628797	EGG MATES
16	86225623	5218824	LITTLE GREEN EGG
17	86179997	4683788	CONVEGGTOR
18	86179504	4818744	SPEEDILIGHT
19	86179479	5319766	MINIMAX
20	85108979	4037333	BIG GREEN EGG
21	85655703	4290311	DIZZY GOURMET
22	85601074	4253694	PREPARE TO GET HUNGRY
23	85290209	4145282	EGGCESSORIES
24	85290055	4259981	EGGHEAD
25	85290034	4488807	EGGSPERT
26	85290013	4141337	EGGFEST
27	85289060	4038719	EGGCELERATOR
28	85258071	4283494	THE ULTIMATE COOKING EXPERIENCE
29	85258049	4263121	BIG GREEN EGG
30	76207416	2627587	BIG GREEN EGG

Examples of publication

If the blouse on the outside of the grill uses a trademark, it is considered an infringement. As long as it is a barbecue peripheral product, be very vigilant!





Click image to open expanded view



Cover for Large Big Green Egg, Heavy Duty Ceramic Grill Cover - Premium Outdoor Grill Cover with Durable and Water Resistant Fabric

Amazon's Choice for "big green egg cover"

Price: **\$19.99** & FREE Returns

Get \$50 off instantly: Pay \$0.00 ~~\$19.99~~ upon approval for the Amazon Rewards Visa Card. No annual fee.

Size: **Large**

Large

X-Large

Color: **Green**



- COVER FOR LARGE BIG GREEN EGG: Fits grill 22" diameter with fold down side tables, 40" high (Large Big Green Egg, Kamado Joe Classic and others)

Recently, Dunhuang.com's Brand Intellectual Property Protection Announcement has listed several new brands. Among them are Harry Potter's hot IPs. The others in the table have been prosecuted by Real Hammer. The special hazard department is also super high:



品牌	图形商标	版权/专利	知识产权类型	产品类型	产品举例
SPIDERCAPO		—	商标	乐器	
POCOYO			商标、版权	服装、玩具等	
STUSSY		—	商标	服装、鞋帽、配饰等	
BRIGHT BUGZ			商标、版权	玩具、电子产品等	
Masha and The Bear			商标、版权	玩具、服装、鞋包、母婴配饰等	
Harry Potter			商标、版权	服装、家居、母婴配饰、珠宝等	

contact us

You can join the SellerDefense group discussion: QQ 16 group: 721813793. (If you **have already added other groups, you don't need to add them again**)

Or visit our official SellerDefense website for the latest news: <https://sellerdefense.cn/>

SellerDefense US trademark registration, the lowest price in the market, please contact us if you need brand registration!

Sellers who have been frozen are welcome to contact us as soon as possible, with over 8,000 case handling experience, long press and identify the QR code below to add friends. We will provide the most professional **free** consulting services in all aspects for different cases .



长按二维码关注

SellerDefense和解代理

专业：成功处理超8000起案件

快速：资料当天递交，消息当天回复

高性价比：取回比例+律师费市场最优

Related Posts:

1. [Madden! Super celebrity Marilyn Monroe Marilyn Monroe product debut case, the name can not be touched! \(There is a list\)](#)

Category: SLADKUS Zoey March 18, 2021 comment

label:



Author: Zoey

HISTORICAL ARTICLES

New brand! These popular games and toy products are frozen and will be removed soon! (There is a list)

FUTURE ARTICLES

urgent! Holmes SHERLOCK HOLMES series products please hurry off the shelves, a large number of sellers have been frozen!

Related Posts



Madden! Super celebrity
 Marilyn Monroe Marilyn
 Monroe product debut
 case, the name can not
 be touched! (There is a
 list)

March 1, 2021



urgent! Elvis Presley is
 represented! It has
 started to freeze!
 Attached is a list of 372
 defendant shops
 February 18, 2021

Comment

Your email address will not be published * is a required field

comment

Name*

e-mail*

Website

☐ Save my name, email, and website in this browser for the next time I comment.

submit comments



Type and press Enter...



SellerDefense WeChat Official Account



U.S. law firm case settlement agent



Infringement knowledge video lecture



GBC agent brand complete video lecture



QQ 1 group: 295380184 (full)

QQ 2 group: 672085077 (full)

QQ 3 group: 866864037 (full)

QQ 6 group: 613979161 (full)

QQ 8 group: 781447834 (full)

QQ 10 group: 812058032 (Full)

QQ 12 group: 852478737 (full)

QQ 15 group: 789733094 (full)

QQ16 group: 721813793

WeChat: dearzhi2019

WeChat public account: SellerDefense

Law Firm Agent Brand

GBC Agency Brands

Keith Agency Brands

EPS Agency Brands

David Agent Brand Collection

Useful links

How can cross-border sellers reduce the risk of being sued for infringement

AliExpress Intellectual Property Zone

Dunhuang Net Intellectual Property Zone

Ebay VERO

How to search for a US trademark

How to search for a Chinese trademark

Basic knowledge of litigation settlement

Categories

Baker

David

EPS

REFERENCE

GBC

GulbransenLaw

HSP

Johnson&Pham LLP

Keener

KEITH

LOEB

SKGF

SLADKUS

SMG

SpencePC

Uncategorized

Other law firms



SellerDefense.cn 2017-2018

Shanghai ICP No. 13015943-1

Shanghai Public Network Security No.

31011502012751



.wpb_animate_when_almost_visible {opacity: 1;}

[List of cases](#)[Brand Library](#)[Case representation](#)[Law Firm Information](#)[Trademark registration](#)[common problem](#)[other](#)

URGENT! ELVIS PRESLEY IS REPRESENTED! IT HAS STARTED TO FREEZE! ATTACHED IS A LIST OF 372 DEFENDANT SHOPS

[Home page](#) / [SLADKUS](#) / [urgent! Elvis...](#)

 Post Views: 781

Good luck everyone! Today reported Joom sellers account being sued, the plaintiff law firms are Georgia **SLADKUS** , the brand is **Elvis** related trademarks, the following message is to freeze the seller received:



From: Joom Team

Date: 2021-02-17, 16:23:32

Subject: 您的Joom账户内资金被冻结



亲爱的卖家，您好！

Joom收到法院命令。根据该命令，**！Joom将暂停向您放款，且需要向法院提供您的信息。**

请注意：法院命令被撤销后，Joom才能对您恢复放款。

您可以与原告代表Kim Dang联系，联系方式✉：

kim@sladlaw.com

请查看附件知晓更多详情。

祝好！

Joom团队

- ✎ [ELVIS001 - Defendant Seller and Store List to JOOM.xlsx](#)
- ✎ [0010 - ORDER GRANTED- Plaintiffs Motion for Ex Parte Temporary Restraining Order Asset Freeze Order and Order to Show Cause \(1\).pdf](#)

Case parameters

Case No.: 21-cv-618

Time of Prosecution: 2021/2/12

Plaintiff: ABG EPE IP, LLC

Brand: Elvis Presley and other trademarks

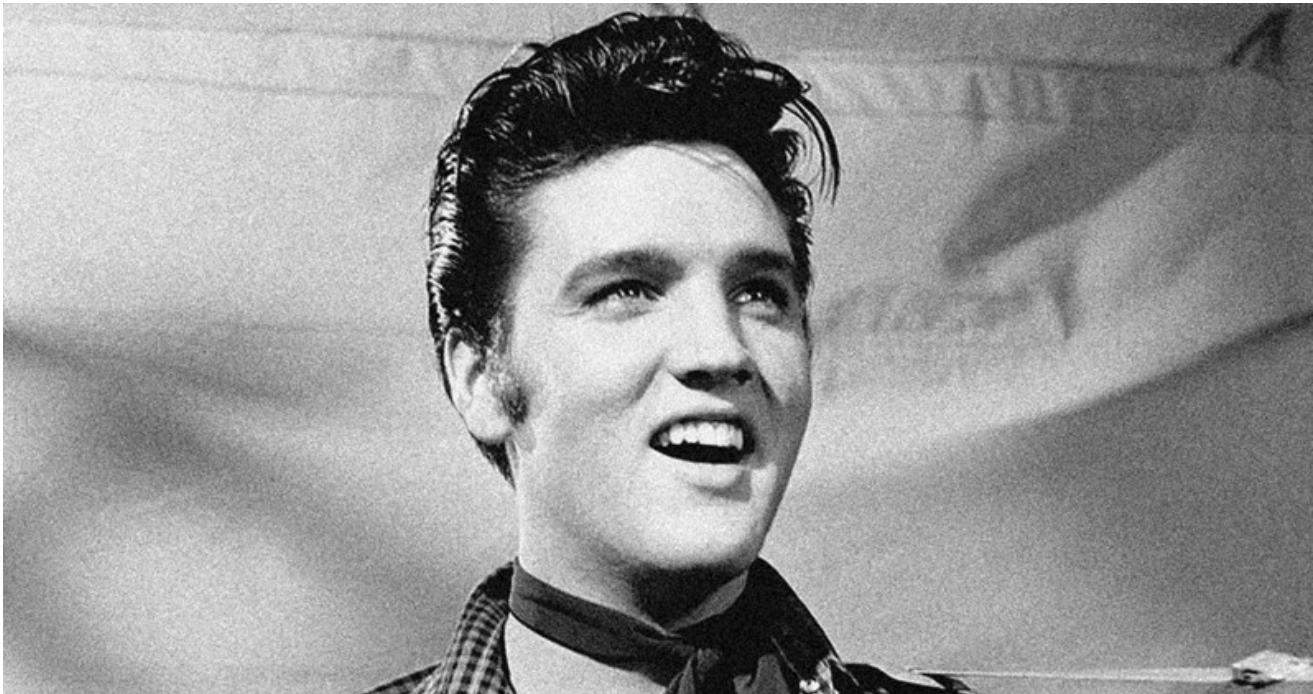
Plaintiff Law Firm: THE SLADKUS LAW GROUP

Place of indictment: GEORGIA, Georgia

Brand mark

Elvis Presley (January 8, 1935-August 16, 1977), was born in Tupelo, Mississippi, USA, an American rock singer and actor.





The plaintiff **ABG EPE IP, LLC** purchased all the IP assets of Elvis Presley on November 18, 2013. The following are some of the Elvis-related trademarks listed in the complaint, including ALL SHOOK UP, BLUE HAWAII, BLUE SUEDE, ELVIS, ELVIS PRESLEY, etc. .

Mark	U.S. Federal Reg. Nos.
ALL SHOOK UP	3718615
BLUE HAWAII	3866674
BLUE SUEDE	3145462
ELVIS	2808601
ELVIS	3386025
ELVIS	3554763
ELVIS	1265579
ELVIS PRESLEY	1342551
ELVIS PRESLEY	1674265
JAILHOUSE ROCK	3821600
KING OF ROCK N ROLL	2158251
LOVE ME TENDER	3747631

Defendant list

This time there are 372 defendant stores, involving multiple platforms. At present, Joom defendant stores have been frozen, and other platforms have not yet received seller reports.

15205060710	liuwenweng
055GJ	liuzhengshop
1995storeshop	lixiaishop0910
2011 fashion clothes	lixinyushop
2015superstore	LiyiMeet
2016 Christmas store	LMJShoping
2016*happystore	Longxiang water pressure pump
2016christmas	Lori Bautch
2016superstore	LotusApparel
2017 liu xi fashion store	lulingfandandedianpu
2017 World First T-shirt	luojinlian
2017discount store	luotingtingde
2017happystore	lusanxianshe
2018happyshop	lxyl
2019 ann store	LXYyun
2019tukago	mafangqi8280
2019zhenggangstore	mage666
7th Avenue Costumes	mailshoop
A858AW	MaiYU Textiles
AAQQQ	malei4636
AB phonecase	maofucui552
AD phone case	maolei4150
ADesigner	Meet love life you
aiepbmshop	meimeistore2018
alian	meixuei
amumudepuzi	mengmengzezeestore
amusing T-shirt	mengl314
Angel love Beauty	miaoSolitude
atongl	Michelle188
autoroad	migu5414
baokuan666	MINGHUXU64
baokuangde changp	musekore
baotianrui	My Goods
BaoYu Xu	Naierxiang
baoyuhaosd	neinei guanmin
BBVNOD JJFSAAQ Fashion women's clothing store	Nicegifts
BBVV565W	ningxiao
Bella Payne54	niyongzheng88017
Benfensy Sticker	NomNom168
Bishop Lew	Old Glory
BoDhitreestore	orangered
brian thielei	Orientaljewelrygiftshop
Buruqi Inner	OSP
Buxom gifts store	otjkidrdsf
Buyanqiqi	ouqu334 plaza
caofengying	panyiming7562
ccf7	parmacist
chanchanstore	peitrod
CHENGPINGGE	personalizationpillowcase
chenlichao123321	Pickering12

chenmeie686899	Pickering51
chenmeifang8897	pillowcase01
Chen's Superstore	piprintondemand
chenshimei973043	PleasingShopping
chenyaqi3320	Pleasureo
chychenhaiyan	PPIIG FJJQF XOP WOMAN CUTE WEARING
Cloeyrfuy Gifts	pushitingji
CLOOCL Store	QH1 Store
Cloudy and sunny	QH4JM Store
Colin Fashion Store	QiangzhixinjutAp
Colourful diamond	qianyu fashion
coolshoe	Qidong Haohuo
D4A*908-4F31	qin fashion world
d4g5g55	renchaoL
D5D5F5	Revolution T-Shirts
daijieljl	rewoix
DARBYJOAN STORE	Rodriguez784
dd6d6d65	Roger Robles
deepblue	rushifuzhuang
DeepDiscount	S&S House
DeepDiscountIntl	sadfasdf54624
Dennie	Sago
Diamond Painting Store-FZ02	sellerswindows market
Diamond Painting Store-FZ03	sguunb
dizuiziling	shanghailuyun
Dobby	Shannle
doiyanx6666	shenbaoyueshop
dorrismillspham14	ShenZhen ShunZhen Plastic Hardware Co.
douliming5558	Ltd
dream15	shenzhenshiyixinghetouzifazhanyouxiangongsi, shijianzhilv
Drizzle home textile	shiqijia
Duiruzhao	shiqin
Ebros Gift	shishangzhuguoji
echosky	SHUOSI Diamond painting
emily-pillow cover shop	sieofoerp
Ephonecase	siponiang
Eve Gentle	Sky-travel
Even play also have to play professional	SlickBlue_
familys	slyzcl1314
Fang2020	smlay Store
fanmudan662961	Smug
fashion min	Special department store supermarket
Fashion shop 2016	Sportlover Apparel Store
fashiongirl7	STHG
Fashionyourway	Stylejewelrys
fdhfgjj678	sunshine-cheongsam
fdsfgfdssa	sunxinglin
Feiyingjihhua	Supermen Store
Fine Living	Swite yang
Flying Bee Store	tantan1624

Fphonecase	Teeshow
fr5gg55	tenghaiyuan
Fun Store2	trfghfgdgd
funly club	tylg
gaodongyu['1	Unbeatableale.com
gaoyan218417	Vinyllife
GEmd	viyiez
GHGHJTKDRer	vkjffgkf
Good friend trade	vqwg82shop
guanjingfengdi	WAN KE PERFET FREE
GuanpujingjiavB	Wangchikeai
GUANXY_521	Wangdadashiwo
gugang	wangfajun6688
Guodemin66058	WANGHUAQIANG9988
guoqiyu3	wangjianting
h8239eed	wanglianjun1314
HaiBo International Trade	wangqiudongli
hailun fashion	wangxinli668
hanjuxiaoming	wanshou
HAOJIA STORE	Wauu
Happy3	weichonghua
HD PRINT_01	wenyl fashion
hekail224	WGHZ Team
Hepeijuan5522	whydiamondpicture
Heypug	wodmif
HHH8886	Wondlandy Magic
HHLV	WORLD FASHION 2021
hmchmc	world_shopping
hohappyme	WR Gifts
HONG KONG WORTH INDUSTRIAL LIMITED	Wuchumping123
Hongfaglassescity	wuhan001269
HuaCan Diamond drawing	wuhanketenzhuangshi technology company
huangjin fashion	WUjunL
huangjuan666666	xgplkzfok
huanglingshopstate	XHJ12
huangxiangstore	XHJ19
huangxuerong654	XHJ43
huhu62	Xia
hunxshihuanhuan	XIA_Store
hushuhuan1114	xiaochen88888
Ideacreationqw	xiaokeaizhu
im.yangyifa	xiaoliangge
In-ear Earphone Electronicsdianzimaoyi	xiaoqiaofeng
insertinSect	xingyu2387431659
Jazz turtle	XinXinssupplies
jiafeng	xiupufudie
jianbingnewcolthesstore	xuqiinbha0
jianglianyu789	xtiantian
Jiharmony	xueqianpangdong
JING-Chinesestyle	xuexiaozhuang

jingjiuwaimao	Xuezhiqing
jingpinjiaoyi	xuxiaoxia
Jinhuibao Shoes	xwmhdm
Jiuying	yang1010
JJHJGI JFALG WOMAN RED SHOP	yangguangqingqingxiaopu
jkkgirl	yanglisan
Joe Marquez	yanigjidusxl
junhua9333	yf0423
k8k82	YH52 Store
Kashif Alandari	yh971224
KEWLLMUOIKQTM	YHONGJ
kkcdzden	yifu wholesale store
kkwty4	Yihao trading
KlovaPhotos	yinxil1983
KryptoKollectibles	YQclothes
L&P store01	Yuan yufang world
L5L5L56	yueke
ladoew	yuelweistore
Lafa	YuGoshone
laiyonglin888,Lamp decoration of shang Jia Yi	yushuang1212
lansitute	YWHL09
lfanswer	z66z5
liaqiduyue	zhangdafeng
lichunxiang0121	zhangjieliul
lidan7321	zhangshishigood
Lidermiss Yunshan Fast	Zhangtaidian
lihuaian6902	zhangyiminga
LiLangfushi	zhaochangfei
liminminli	zhenglongteng
Lingchen Store	ZHENGQINGSHAN120
lingjundexiaodian	Zhezheknittingshop
linshujiao	zhoujunjunjiejie
liqingngka9607	zhushengmei, zhuyingjieshop
liuchunchuang	zoucuiwen8325
liufengliao 123	Zunjuexiaong
LiuSiqi1115	zyh22

Examples of publication

Searching for **Elvis** on various platforms can find many products related to Elvis:



Elvis Presley Face Cover Reusable Face Mouth Cover Decorations Bandanas Lightweight Scarf for Women and Men

Brand: 183 ratings

Price: \$11.99 & FREE Returns

Get \$50 off instantly: Pay \$0.00 \$11.99 upon approval for the Amazon Rewards Visa Card. No annual fee.

- Material: 100% Polyester.
- Size: One Size Which Fits Most Men And Women Comfortably With Excellent Close Fit.
- Breathable And Smooth: Curved Fit Under Chin For Comfortable Non-Binding Feel, Soft Material For Comfortable Long Term Wear.
- Ideal For Everyday Use: Indoor/Outdoor, Great For Essential Workers, Can Be Utilized While Traveling, Running Errands, Attending Grooming Appointments, Etc.
- Perfect Gift: It Is Ideal For Cycling, Running, Woodworking, And Other Outdoor Activities. The Best Holiday Gift For Family, Friends And Colleagues. Bet They'll Love It!

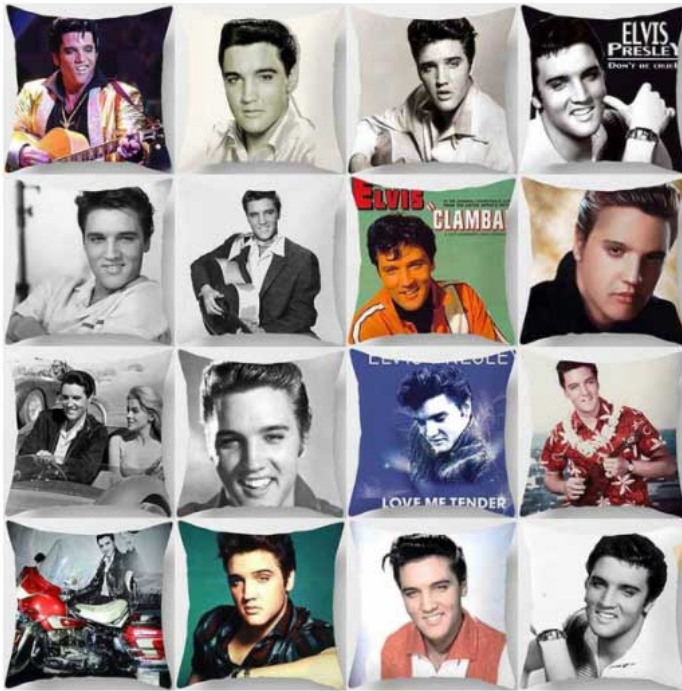
Compare with similar items

New (2) from \$11.99 & FREE Shipping on orders over \$25.00

Report incorrect product information.

Overview

Related



Elvis Presley (Elvis) double-sided pattern pillowcase sofa home decoration car office supplies outdoor supplies cushion (45cm-45cm)

★★★★★ (1504 reviews)

\$3.82

Size:

Select Size

04:29

Instant offer: Add to cart right now to unlock a lower price!

Buy

♥ Add to Wishlist



New Fashion Women/Men Rock Singer **Elvis Presley** 3D Print Casual T-Shirt E52

Condition: **New without tags**

"Attention! The Asian size is usually smaller 2-3 sizes than UK size, so please check the measuring" ... [Read more](#)

Size: **- Select -**

Colour: **- Select -**

Quantity: **1** Last one / **236 sold**

Price: **GBP 6.99**
Approximately RMB 62.35

Buy It Now

Add to cart

♥ Add to Watchlist

100% buyer satisfaction

236 sold

More than 64% sold

Shipping: **GBP 1.00 (approx. RMB 8.92)** Standard SpeedPAK from China/Hong Kong/Taiwan | [See details](#)

International shipment of items may be subject to customs processing and additional charges.

Item location: **shenzhen, China**

Ships to: **Worldwide** [See exclusions](#)

Delivery: **Estimated between Tue. Apr. 13 and Thu. Apr. 29**

Seller ships within 30 days after [receiving cleared payment](#).



Vintage Elvis Presley Keychain Jewelry with Glass Cabochon Double Side Elvis Presley Pattern Key Rings for Fans Gift

★★★★★ 4.4 36 Reviews 70 orders

£ 1.31 ~~£ 2.14~~ -39%

£ 2.23 New User Coupon £ 0.75 off on £ 6.69 Get coupons

Color:



Quantity:

1 7797 pieces available

Free Shipping

to United Kingdom via Cainiao Super Economy Global

Estimated Delivery: 30-50 days

Case analysis

The plaintiff's law firm is THE SLADKUS LAW GROUP in Georgia, USA. This law firm has represented many brands, including Moncler, Dominique Wilkins DOMINIQUE WILKINS, HARRINGTON, etc.

This law firm sees the settlement of frozen amounts and sales of infringing products. The difficulty of settlement is slightly easier than that of GBC.

Everyone, check whether your shop is on the defendant list? If you need to pay close attention to arranging withdrawals and other operations, you should also check whether you are selling Elvis products and whether you have sold Elvis related products? Take countermeasures. If you have any questions or want to know about first-hand infringement consultation, please add the post and WeChat at the end.

contact us

For more first-hand news, you can follow our official Douyin account, save the picture, open the Douyin APP and scan the QR code to follow us. We will share some of the latest, most comprehensive and fastest news about intellectual property on Douyin.



SellerDefense

我们的口号是分享、防御、互助，我们致力于为卖家的跨境电商生意保驾护航！

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Or visit our official SellerDefense website for the latest news: <https://sellerdefense.cn/>

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专业：成功处理超8000起案件

快速：资料当天递交，消息当天回复

高性价比：取回比例+律师费市场最优


No related posts.

Category: SLADKUS admin February 18, 2021 comment




Author: ADMIN

HISTORICAL ARTICLES

 **New brand! The first case of Weed Snatcher weeder, the picture is copyrighted, and it hasn't been frozen, quickly remove it!**

FUTURE ARTICLES

The new brands POCOYO XiaoP Youyou and DRAIN WEASEL pipe dredging tools were represented by Keith and Keener law firms, respectively, and began to freeze. Emergency removal!




Related Posts



Emergency removal! The new brand Big Green Egg is secretly frozen, please cash it out as soon as possible!
March 18, 2021



Madden! Super celebrity Marilyn Monroe Marilyn Monroe product debut case, the name can not be touched! (There is a list)



March 1, 2021

Comment

Your email address will not be published * is a required field

comment

Name*

e-mail*

Website

☐ Save my name, email, and website in this browser for the next time I comment.

submit comments

Type and press Enter...



SellerDefense WeChat Official Account



U.S. law firm case settlement agent



Infringement knowledge video lecture



GBC agent brand complete video lecture



QQ 1 group: 295380184 (full)
QQ 2 group: 672085077 (full)
QQ 3 group: 866864037 (full)
QQ 6 group: 613979161 (full)
QQ 8 group: 781447834 (full)
QQ 10 group: 812058032 (Full)
QQ 12 group: 852478737 (full)
QQ 15 group: 789733094 (full)
QQ16 group: 721813793
WeChat: dearzhi2019
WeChat public account: SellerDefense

Law Firm Agent Brand

GBC Agency Brands
Keith Agency Brands
EPS Agency Brands
David Agent Brand Collection

Useful links

How can cross-border sellers reduce the risk of being sued for infringement
AliExpress Intellectual Property Zone
Dunhuang Net Intellectual Property Zone
Ebay VERO
How to search for a US trademark
How to search for a Chinese trademark
Basic knowledge of litigation settlement

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SMG
SpencePC
Uncategorized
Other law firms

SellerDefense.cn 2017-2018
Shanghai ICP No. 13015943-1

Shanghai Public Network Security No.
31011502012751



.wpb_animate_when_almost_visible {opacity: 1;}

List of cases

Brand Library

Case representation



Law Firm Information

Trademark registration

common problem

other

MADDEN! SUPER CELEBRITY MARILYN MONROE MARILYN MONROE PRODUCT DEBUT CASE, THE NAME CAN NOT BE TOUCHED! (THERE IS A LIST)

Home page / SLADKUS / Madden! super...

 Post Views: 824

After Einstein, Stan Lee and many other celebrities were represented by major law firms, THE SLADKUS LAW GROUP even directly won the agency rights of **Marilyn Monroe and Marilyn Monroe** related products, the first sudden case!

Hundreds of seller accounts were prosecuted in this case, and it is very likely that the case will be filed in the future. It hasn't started to freeze, please hurry up and check if there are similar products and remove them quickly!

Case parameters

Case No.: 21-cv-788

Time of Prosecution: 2021/2/24

Plaintiff Product: Marilyn Monroe Marilyn Monroe

Plaintiff Company: The Estate of Marilyn Monroe, LLC

Acting Law Firm: THE SLADKUS LAW GROUP

Prosecution Place: Georgia

Marilyn Monroe Marilyn Monroe



Marilyn Monroe was an actress, model, and singer. By the time she died in 1962, the total box office of the movie was approximately \$200 million. Subsequently, the American Film Institute listed her as a screen legend in American film history.

The plaintiff company The Estate of Marilyn Monroe, LLC owns the intellectual property rights related to Marilyn Monroe, including trademark rights.

Trademark:

The main mention in the complaint is Marilyn Monroe's related word mark. It is not clear whether the image copyright will be captured at present, but it is best not to touch the related products.

The word marks Marilyn Monroe, M Monroe, Marilyn, including handwritten signatures, cannot be used directly:

United States of America
United States Patent and Trademark Office

MARILYN

Reg. No. 4,040,943

Registered Oct. 18, 2011

Int. Cl.: 33

TRADEMARK

PRINCIPAL REGISTER

MM-ABG, LLC (DELAWARE LIMITED LIABILITY COMPANY)
100 WEST 33RD STREET, SUITE 1007
NEW YORK, NY 10001

FOR: WINES, IN CLASS 33 (U.S. CLS. 47 AND 49).

FIRST USE 0-0-1987; IN COMMERCE 0-0-1988.

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

OWNER OF U.S. REG. NO. 1,889,730.

THE NAME "MARILYN" DOES NOT IDENTIFY A LIVING INDIVIDUAL.

SER. NO. 85-197,845, FILED 12-14-2010.

LAKEISHA LEWIS, EXAMINING ATTORNEY



United States of America

United States Patent and Trademark Office

Marilyn Monroe

Reg. No. 4,527,088

Registered May 6, 2014

Int. Cls.: 16, 25, and 27

TRADEMARK

PRINCIPAL REGISTER

THE ESTATE OF MARILYN MONROE, LLC (DELAWARE LIMITED LIABILITY COMPANY)
100 WEST 33RD STREET, SUITE 1007
C/O AUTHENTIC BRANDS GROUP, LLC
NEW YORK, NY 10001

FOR: ADDRESS BOOKS AND DIARIES; DIARIES, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 7-1-2012; IN COMMERCE 7-1-2012.

FOR: BEACH FOOTWEAR; FOOTWEAR; FOOTWEAR FOR MEN AND WOMEN; FOOTWEAR, NAMELY, PUMPS, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 5-1-2013; IN COMMERCE 5-1-2013.

FOR: CARPETS; CARPETS, RUGS, MATS AND MATTING, LINOLEUM FOR COVERING EXISTING FLOORS; VEHICLE CARPETS, IN CLASS 27 (U.S. CLS. 19, 20, 37, 42 AND 50).

FIRST USE 1-1-2009; IN COMMERCE 1-1-2009.

United States of America

United States Patent and Trademark Office

MINI MARILYN

Reg. No. 5,256,595

Registered Aug. 01, 2017

Int. Cl.: 25

Trademark

Principal Register

The Estate of Marilyn Monroe, LLC (DELAWARE LIMITED LIABILITY COMPANY)
1411 Broadway, 4th Fl
New York, NY 10018

CLASS 25: clothing, namely, belts, blazers, blouses, body suits, bottoms, bras, coats, dresses, ear muffs, footwear, gloves, headwear, hosiery, jackets, jeans, fashion tops, sweatshirts, knit bottoms, knit tops, lingerie, loungewear, mittens, neckwear, pants, robes, scarves, shawls, shirts, shorts, skirts, sleepwear, socks, suits, sweaters, swimwear, t-shirts, tank tops, tops, tracksuits, underwear, vests; headgear, namely, hats and caps

FIRST USE 5-25-2017; IN COMMERCE 5-25-2017

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

OWNER OF U.S. REG. NO. 2180950, 1889730, 1509758

SER. NO. 86-293,449, FILED 05-28-2014
TOBY ELLEN BULLOFF, EXAMINING ATTORNEY



Int. Cls.: 3, 14, 16, 25 and 28

Prior U.S. Cls.: 22, 26, 28, 37, 38, 39, 50 and 51

United States Patent and Trademark Office

Reg. No. 1,509,758

Registered Oct. 25, 1988

**TRADEMARK
PRINCIPAL REGISTER**



EXECUTOR OF THE ESTATE OF MARILYN
MONROE, THE (NEW YORK ESTATE)
C/O AARON FROSCH, EXECUTOR
641 LEXINGTON AVENUE
NEW YORK, NY 10016

FOR: PERFUME, IN CLASS 3 (U.S. CL. 51).
FIRST USE 11-0-1983; IN COMMERCE
11-0-1983.

FOR: WATCHES, IN CLASS 14 (U.S. CL. 28).
FIRST USE 11-0-1983; IN COMMERCE
11-0-1983.

FOR: CLOTHING PATTERNS, BALLPOINT
PENS, POSTERS AND GREETING CARDS, IN
CLASS 16 (U.S. CLS. 26, 37 AND 38).

FIRST USE 12-0-1983; IN COMMERCE
12-0-1983.

FOR: SLIPPERS, PANTIES, DRESSES AND
SWIMSUITS, IN CLASS 25 (U.S. CL. 39).

FIRST USE 1-0-1983; IN COMMERCE
1-0-1983.

FOR: PAPER DOLLS AND BALLOONS, IN
CLASS 28 (U.S. CLS. 22 AND 50).

FIRST USE 11-0-1983; IN COMMERCE
11-0-1983.

SER. NO. 633,842, FILED 12-4-1986.

HELEN ROBERTS WENDEL, EXAMINING AT-
TORNEY

The plaintiff company has registered the following word marks in total. In addition to the above-mentioned list, slogans like DIAMOND'S ARE A GIRL'S BEST FRIEND, A DIAMOND IS A GIRL'S BEST FRIEND should also be careful:

	Serial Number	Reg. Number	Word Mark	Check Status	Live/Dead
1	88571095		MARILYN MONROE	TSDR	LIVE
2	88206712		DIAMOND'S ARE A GIRL'S BEST FRIEND	TSDR	LIVE
3	88379260	6211936	MARILYN MONROE	TSDR	LIVE
4	88953866		MARILYN MONROE	TSDR	LIVE
5	88737604	6100911	MARILYN MONROE	TSDR	LIVE
6	88379455	6025494	MARILYN MONROE	TSDR	LIVE
7	88159784	5928263	MARILYN MONROE	TSDR	LIVE
8	88158366	5928256	MARILYN MONROE	TSDR	LIVE
9	88117471	5928036	MARILYN MONROE	TSDR	LIVE
10	87470538	6262203	MARILYN MONROE	TSDR	LIVE
11	87755273	5978750	MARILYN MONROE	TSDR	LIVE
12	87667449	5956159	MARILYN MONROE	TSDR	LIVE
13	87878608	5616902	M MONROE	TSDR	LIVE
14	87254766	5367905	ROYAL LEGEND BRAND	TSDR	LIVE
15	86321904	4758794	MARILYN MONROE	TSDR	LIVE
16	86321877	4758793	MARILYN MONROE	TSDR	LIVE
17	86734837	5481423	MARILYN MONROE	TSDR	LIVE
18	86825012	5205677	MARILYN MONROE	TSDR	LIVE
19	86293449	5256595	MINI MARILYN	TSDR	LIVE
20	85326352	4743834	MARILYN MONROE	TSDR	LIVE
21	85197845	4840843	MARILYN	TSDR	LIVE

Examples of publication

The infringement is obvious:





Marilyn Monroe Wall Pictures for Living Room Movie Posters and Prints Wall Art Canvas Painting Home Decor Black White Figure

★★★★★ 4.7 116 Reviews 307 orders

US \$0.91 - 14.82 ~~US \$1.20 - 19.50~~ -24%

US \$2.00 New User Coupon [Get coupons](#)

Size (Inch):

- | | | |
|-------------------|------------------|------------------|
| 10X15cm no frame | 13X18cm no frame | 20X25cm no frame |
| 21X30cm no frame | 30X40cm no frame | 40X50cm no frame |
| 40X60cm no frame | 50X70cm no frame | 60X80cm no frame |
| 70X100cm no frame | | |

Color:

2021 Women Marilyn Monroe Dress Plus Size Dresses Vintage Long Sleeve Black White Casual Fashion Loose Tshirt Dress Robes

★★★★★ 4.8 20 Reviews 53 orders

US \$10.05 - 14.74 ~~US \$15.00 - 22.00~~ -33%

Instant discount: Buy 3 get 2% off

US \$2.00 New User Coupon [US \\$1.00 off on US \\$12.00](#) [Get coupons](#)

Color:



Size:

- | | | | | | | | |
|---|---|---|----|-----|------|-----|-----|
| S | M | L | XL | XXL | XXXL | 4XL | 5XL |
|---|---|---|----|-----|------|-----|-----|



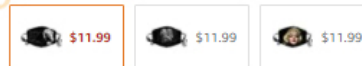
Marilyn Monroe Face Mask Reusable Washable Polyester Face Protection Women Mouth Cover for Holiday Decorations-All

★★★★★ 11 ratings

Price: \$11.99 & FREE Returns

Join Prime to save \$1.20 on this item

Color: Marilyn Monroe-01



Size	Medium
Brand	CGMIBAS
Color	Marilyn Monroe-01
Material	Polyester

About this item

- Mouth Cover Size: 18cm x 11cm/ 7.08 x 4.33 inch, cover half of the face from nose to chin, make everyday become fun and safe for you.
- Breathable Material: 100% polyester, soft, adjustable, collapsible, long-term washing doesn't deform, wearing this face cover can protect you from dust, small particles in the air, pollen etc.

Defendant list

The information disclosed by the law firm is temporarily unclear on which platforms, but there are many defendants:

**THE ESTATE OF MARILYN MONROE
LLC,**

Plaintiff,

v.

123oilpainting, 2011 fashion clothes,
2015superstore, 2016 Christmas store,
2016*happystore, 2016superstore,
2016xuexuesuperstore, 2017 liu xi fashion
store, 2017 World First T-shirt,
2017happystore, AAYYS SUSJJFMB Middle
aged men's clothing shop, abbottpamula,
accountant123, Acmfld, Aelfric Eden Store,
aixiaodexiaocho, AK001, allan robbins,
Andrea2897, Angel_ Suit Shop, anime picture
wall painting, AppleTree Fashion Department
Store Co., LTD, Aqqwe, art_2017,
asbhnidchj, baBoosmo, baiao, baijupingshop,
baotianrui, Beauty Life Home Decor, beauty
wholesaleshop, bgtyt, bianjingjingh,
biaomei666, Big Different2344, bighomeshop,
Binbinyouning, Bmlanche, bowuart,
buchangyou1989, Cai Gen Traders, California
Republic Clothes, CangNan Worth Arts and
Crafts co.,ltd, canvas art home decor,
caoxiaolingshop, Cathie cotton pads,
chanchanstore, chanchanstore, chebiao,
CHENCHEN01, cheng20hao, chensaixia2017,
chenshan23517, chenshimei973043, chic
crowd, Chong liu fushi, coolpudo520,
cuipanxinlu, curipktuonfd, DaonashawenYb,
dasmol2017, Dattinghouseholddress,



dearlover, dengtiantianshop, Diners doll house,
DN-house, Dobby, douliming5558,
dragoncontry, eef57kj, ellays, emily-pillow
cover shop, Encounter Art, enjoy everything,
erdfefg, Eric8099, Eternal Spring, f6f5f,
fangjianglingshop, fanjjdd, Fashion shop 2016,
FasyShop, Feiyingjihhua, fengguijieshop,
FENZHENG0216, fewroewurewiorwe, Forest
Demon, fpy98, ftahtianakanari, funnyshirts,
fuyuwei, gaodongyu['l, gaoyamei,
gaoyan218417, geyingguang98765, Gobbsilbi,
goxx96, graphictopic, Greatest MOM Store,
GRRGRT8, guoguomamayo, HaiBo
International Trade, hangzhou wenlai co.,ltd,
Hank Art, hanyunchao6689, hao5201314,
happyevery daymorning123, hardfisted,
hdhac, hepingyong, here with u, hgdhh445fj8g,
Ho wenwen, holidayhome, Home of Fashion,
hongjun758520, HongZhao Technology, Hua
han li 1 A, hualushaa, huangxuezheng888,
huhuijiashop, Hui Lei, huibadaoqiu,
huihuibao, huxiaoliang289, huyipingping, HZL
Gallery, JAFashion, Jazz turtle,
jiahuandianzishangxing, jiaojiaojingjing,
jiawanhao fashion, JICUIKE Technology Co.,
Ltd, jiejiaodezhufu, Jinba Men's Wear,
jingyanshengying, Jinhuibao Shoes, Junjing69,
Justin's Bridal, K8K8K8, ke72e,
kenji29552851m, Kimberly Torregano, Kiss
love for yourself, KlovaPhotos, kolesw,
labilucky, lailai1238, LangmikuimUa,
LARISSA CORONADO, lauralidesigns,
leizhang special, Les_Tresors_de_Lily,
LFL2017, LGH, lhshdks, li shuang an, liang_1,
liaqiduyue, lie2019, lijinxian, linzi Oil
Painting, liqiaozhen123, Little Pumpkin,
liuhaiyun, liurongxiu369369, lixiashop0910,

lixua, liyang111, liyaolong13, LiyiMeet,
liyuhao, Loka international, Loten foever
vatmans, Lucky charm studio, lufeci,
luofangmln123456, lusanxianshe, LXego,
lxlixianlx, LXYyun, Madison 1992, madison
shopping, mamengyao2017, maojun0402,
maqianshop, Marianny Aguilera, mattshop,
mawenbin521088, MCJewelry, meiyuart,
mengruixin1164, miaoSolitude, migu5414,
MIPAN9, mixi, MM Mall, Moment And Echo,
Mozlly, muyang-originally, My lucky home,
Mying interantional, myloverbaby,
nealeyrincpyha, nichengqqqw, Nuntachai,
NVIEHZ KDIG Daily department store,
NWQ, ofiuyqjmt, Old Glory,
Orientaljewelrygiftshop, PANDAYAQ,
peitrod, Posterazzi, print_for_you,
QINGQING888, qqnlv1shop, qwjovxshop,
rexiazuhay, rgfge, Richie Savino,
ridiculiseraien, rjlpvnshop, roberts32russell5,
rouroudejingxiwu, Ruler girl peg, ruowei,
rushifuzhuang, rutherfordcornelia7,
sadfasdf54624, safdgcx store, Sago, San Zi E-
Commerce CoLtd, saokeu, sdaffdsakjhk,
SDFSADFSDF, sdm artshop, Serendipity N,
Shawn, shengjiafenghui, shenshiyan, shenzhen
morphic technology Co.,ltd,
shenzhenshiyixinghetouzifazhanyouxiangongsi,
Shieyousu cots, Shiny Home, showtimemylife,
Shuang Jie fuzhuang,
SHUIZHIDAOJIAOSHENMEMINGZI,
sieofoerp, since1872, SMD9shop, soogu,
Soulmatelv, Sportlover Apparel Store, SQY,
storem, streeshot, suhaiyanyan,
sundayshoppingfunny, sunshine-cheongsam,
super international co.,ltd, Swite yang, SX-
WL, tanw, tanxiaopu, TengxingjumA,

tianyuan supermarket, Tijiaoer Skincare, Tingxuan shopping, Toma, Toni Cafer, Toyink Toys, TriSevenEntertainment, TroyPeteoTtG, Tyson electric specializes in, unicorninwax, Union Fashion, viyiez, Volvey Sanitary Ware Co., Ltd., vveetty, wangchuanji, wangjiawen8106, wangting6688, wangyulu1996, wanwanmaoyiyouxiangongsi, Waou, weige123, wellcomforworld, wo, women film, WORLD FASHION 2021, wqhhtdnbl, WR Fashion Gifts, wubinart, wuhan001269, wuhanketenzhuangshi technology company, wwsstt, WZLTD, xiajing168168, xiaozhonqing, xichangguilin, xingna, xingzhenkun, Xinyu trade, xm2020, xuchengbin99966600, xuejun88, xueqianpangdong, XunYuStores, yan xiang store, yangbin827, Yanltd, yehaibin, yey7473shop, yf0423, ying-12032962, Yiwu Even Store, yiwushizhakenmaoyishangxing, yjltd, YongXiangArt, yqiktore, yueqimaoyiyouxiangongsi, Yueyouhe, YWART, ywcompeteyouth03, zcl Shop, ZenLife, Zero Creative, ZGDM, ZGGU, zhangpicks, zhangsan66057, Zhangtaidian, zhangting98098, zhangwen66058, zhangyomg12135, zhangyongmingshop, Zhe yu home decoration, zhenjian_print, zhongxiaomei, zhoujunjunjiejie, zhuqingqingshop, zhuxiaoting1988, ZKTOLEHROR, znlttd, ZOOYADiamondEmbroideryOfficial, ZPJ-shop, zyltd, and ZZY Art Decor,

Defendants.

Key summary

- 1) As Marilyn Monroe is well-known and has a wide variety of related peripheral products, the probability of directly using a person's name is still relatively large
- 2) Do not use the relevant text and pattern trademarks directly, especially the title of the publication; the image copyright complaint is temporarily not mentioned, and we will update it as soon as there is progress in the future.



- 3) The freezing has not started yet, it is estimated that it will be this month soon. But the list has been made public, you can check if you have your own shop
- 4) The law firm's settlement fee mainly depends on the frozen amount, which should start with at least US\$1,000

contact us

You can join the SellerDefense group discussion: QQ 16 group: 721813793. (If you **have already added other groups, you don't need to add them again**)

Or visit our official SellerDefense website for the latest news: <https://sellerdefense.cn/>

SellerDefense US trademark registration, the lowest price in the market, please contact us if you need brand registration!

Sellers who have been frozen are welcome to contact us as soon as possible, with over 8,000 case handling experience, long press and identify the QR code below to add friends. We will provide the most professional **free** consulting services in all aspects for different cases .



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No related posts.

Category: SLADKUS Zoey March 1, 2021 comment

label: Marilyn Monroe sladkus




Author: Zoey



HISTORICAL ARTICLES

 **note! This kind of tree of life pattern is copyrighted and infringes it if it is used! It's not frozen yet, hurry up and remove it!**

FUTURE ARTICLES

Gadgets sued 340 seller accounts! The freezing has begun, and the patents will be removed soon! 

Related Posts



Emergency removal! The new brand Big Green Egg is secretly frozen, please cash it out as soon as possible!

March 18, 2021



urgent! Elvis Presley is represented! It has started to freeze! Attached is a list of 372 defendant shops

February 18, 2021

Comment

Your email address will not be published * is a required field



comment

Name*

e-mail*

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☐ Save my name, email, and website in this browser for the next time I comment.

submit comments

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U.S. law firm case settlement agent



Infringement knowledge video lecture



GBC agent brand complete video lecture



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QQ 2 group: 672085077 (full)

QQ 3 group: 866864037 (full)

QQ 6 group: 613979161 (full)

QQ 8 group: 781447834 (full)

QQ 10 group: 812058032 (Full)

QQ 12 group: 852478737 (full)

QQ 15 group: 789733094 (full)

QQ16 group: 721813793

WeChat: dearzhi2019

WeChat public account: SellerDefense

Law Firm Agent Brand

GBC Agency Brands

Keith Agency Brands

EPS Agency Brands

David Agent Brand Collection

Useful links

How can cross-border sellers reduce the risk of being sued for infringement

AliExpress Intellectual Property Zone

Dunhuang Net Intellectual Property Zone

Ebay VERO

How to search for a US trademark

How to search for a Chinese trademark

Basic knowledge of litigation settlement

Categories

Baker

David

EPS

REFERENCE

GBC

GulbransenLaw

HSP

Johnson&Pham LLP

Keener

KEITH

LOEB

SKGF

SLADKUS

SMG

SpencePC



Uncategorized

Other law firms

SellerDefense.cn 2017-2018

Shanghai ICP No. 13015943-1

Shanghai Public Network Security No.
31011502012751



CIVIL COVER SHEET

The JS44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form is required for the use of the Clerk of Court for the purpose of initiating the civil docket record. (SEE INSTRUCTIONS ATTACHED)

I. (a) PLAINTIFF(S)**DEFENDANT(S)**

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF

 (EXCEPT IN U.S. PLAINTIFF CASES)

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT

 (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED

(c) ATTORNEYS (FIRM NAME, ADDRESS, TELEPHONE NUMBER, AND E-MAIL ADDRESS)

ATTORNEYS (IF KNOWN)

II. BASIS OF JURISDICTION

(PLACE AN "X" IN ONE BOX ONLY)

- | | |
|-----------------------------|---|
| 1 U.S. GOVERNMENT PLAINTIFF | 3 FEDERAL QUESTION (U.S. GOVERNMENT NOT A PARTY) |
| 2 U.S. GOVERNMENT DEFENDANT | 4 DIVERSITY (INDICATE CITIZENSHIP OF PARTIES IN ITEM III) |

III. CITIZENSHIP OF PRINCIPAL PARTIES

(PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)
 (FOR DIVERSITY CASES ONLY)

- | PLF | DEF | PLF | DEF |
|-----|---|-----|---|
| 1 | 1 CITIZEN OF THIS STATE | 4 | 4 INCORPORATED OR PRINCIPAL PLACE OF BUSINESS IN THIS STATE |
| 2 | 2 CITIZEN OF ANOTHER STATE | 5 | 5 INCORPORATED AND PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE |
| 3 | 3 CITIZEN OR SUBJECT OF A FOREIGN COUNTRY | 6 | 6 FOREIGN NATION |

IV. ORIGIN (PLACE AN "X" IN ONE BOX ONLY)

- | | | | | | | |
|--|----------------------------|---------------------------------|--------------------------|--|---------------------------------------|---|
| 1 ORIGINAL PROCEEDING | 2 REMOVED FROM STATE COURT | 3 REMANDED FROM APPELLATE COURT | 4 REINSTATED OR REOPENED | 5 TRANSFERRED FROM ANOTHER DISTRICT (Specify District) | 6 MULTIDISTRICT LITIGATION - TRANSFER | 7 APPEAL TO DISTRICT JUDGE FROM MAGISTRATE JUDGE JUDGMENT |
| 8 MULTIDISTRICT LITIGATION - DIRECT FILE | | | | | | |

V. CAUSE OF ACTION

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE - DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY)

(IF COMPLEX, CHECK REASON BELOW)

- | | |
|--|--|
| 1. Unusually large number of parties. | 6. Problems locating or preserving evidence |
| 2. Unusually large number of claims or defenses. | 7. Pending parallel investigations or actions by government. |
| 3. Factual issues are exceptionally complex | 8. Multiple use of experts. |
| 4. Greater than normal volume of evidence. | 9. Need for discovery outside United States boundaries. |
| 5. Extended discovery period is needed. | 10. Existence of highly technical issues and proof. |

CONTINUED ON REVERSE

FOR OFFICE USE ONLY

RECEIPT # _____	AMOUNT \$ _____	APPLYING IFP _____	MAG. JUDGE (IFP) _____
JUDGE _____	MAG. JUDGE _____ (Referral)	NATURE OF SUIT _____	CAUSE OF ACTION _____

VI. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)CONTRACT - "0" MONTHS DISCOVERY TRACK

150 RECOVERY OF OVERPAYMENT &
ENFORCEMENT OF JUDGMENT
152 RECOVERY OF DEFAULTED STUDENT
LOANS (Excl. Veterans)
153 RECOVERY OF OVERPAYMENT OF
VETERAN'S BENEFITS

CONTRACT - "4" MONTHS DISCOVERY TRACK

110 INSURANCE
120 MARINE
130 MILLER ACT
140 NEGOTIABLE INSTRUMENT
151 MEDICARE ACT
160 STOCKHOLDERS' SUITS
190 OTHER CONTRACT
195 CONTRACT PRODUCT LIABILITY
196 FRANCHISE

REAL PROPERTY - "4" MONTHS DISCOVERY TRACK

210 LAND CONDEMNATION
220 FORECLOSURE
230 RENT LEASE & EJECTMENT
240 TORTS TO LAND
245 TORT PRODUCT LIABILITY
290 ALL OTHER REAL PROPERTY

TORTS - PERSONAL INJURY - "4" MONTHS DISCOVERY TRACK

310 AIRPLANE
315 AIRPLANE PRODUCT LIABILITY
320 ASSAULT, LIBEL & SLANDER
330 FEDERAL EMPLOYERS' LIABILITY
340 MARINE
345 MARINE PRODUCT LIABILITY
350 MOTOR VEHICLE
355 MOTOR VEHICLE PRODUCT LIABILITY
360 OTHER PERSONAL INJURY
362 PERSONAL INJURY - MEDICAL
MALPRACTICE
365 PERSONAL INJURY - PRODUCT LIABILITY
367 PERSONAL INJURY - HEALTH CARE/
PHARMACEUTICAL PRODUCT LIABILITY
368 ASBESTOS PERSONAL INJURY PRODUCT
LIABILITY

TORTS - PERSONAL PROPERTY - "4" MONTHS DISCOVERY TRACK

370 OTHER FRAUD
371 TRUTH IN LENDING
380 OTHER PERSONAL PROPERTY DAMAGE
385 PROPERTY DAMAGE PRODUCT LIABILITY

BANKRUPTCY - "0" MONTHS DISCOVERY TRACK

422 APPEAL 28 USC 158
423 WITHDRAWAL 28 USC 157

CIVIL RIGHTS - "4" MONTHS DISCOVERY TRACK

440 OTHER CIVIL RIGHTS
441 VOTING
442 EMPLOYMENT
443 HOUSING/ ACCOMMODATIONS
445 AMERICANS with DISABILITIES - Employment
446 AMERICANS with DISABILITIES - Other
448 EDUCATION

IMMIGRATION - "0" MONTHS DISCOVERY TRACK

462 NATURALIZATION APPLICATION
465 OTHER IMMIGRATION ACTIONS

PRISONER PETITIONS - "0" MONTHS DISCOVERY TRACK

463 HABEAS CORPUS- Alien Detainee
510 MOTIONS TO VACATE SENTENCE
530 HABEAS CORPUS
535 HABEAS CORPUS DEATH PENALTY
540 MANDAMUS & OTHER
550 CIVIL RIGHTS - Filed Pro se
555 PRISON CONDITION(S) - Filed Pro se
560 CIVIL DETAINEE: CONDITIONS OF
CONFINEMENT

PRISONER PETITIONS - "4" MONTHS DISCOVERY TRACK

550 CIVIL RIGHTS - Filed by Counsel
555 PRISON CONDITION(S) - Filed by Counsel

FORFEITURE/PENALTY - "4" MONTHS DISCOVERY TRACK

625 DRUG RELATED SEIZURE OF PROPERTY
21 USC 881
690 OTHER

LABOR - "4" MONTHS DISCOVERY TRACK

710 FAIR LABOR STANDARDS ACT
720 LABOR/MGMT. RELATIONS
740 RAILWAY LABOR ACT
751 FAMILY and MEDICAL LEAVE ACT
790 OTHER LABOR LITIGATION
791 EMPL. RET. INC. SECURITY ACT

PROPERTY RIGHTS - "4" MONTHS DISCOVERY TRACK

820 COPYRIGHTS
840 TRADEMARK

PROPERTY RIGHTS - "8" MONTHS DISCOVERY TRACK

830 PATENT
835 PATENT-ABBREVIATED NEW DRUG
APPLICATIONS (ANDA) - a/k/a
Hatch-Waxman cases

SOCIAL SECURITY - "0" MONTHS DISCOVERY TRACK

861 HIA (1395ff)
862 BLACK LUNG (923)
863 DIWC (405(g))
863 DIWW (405(g))
864 SSID TITLE XVI
865 RSI (405(g))

FEDERAL TAX SUITS - "4" MONTHS DISCOVERY TRACK

870 TAXES (U.S. Plaintiff or Defendant)
871 IRS - THIRD PARTY 26 USC 7609

OTHER STATUTES - "4" MONTHS DISCOVERY TRACK

375 FALSE CLAIMS ACT
376 Qui Tam 31 USC 3729(a)
400 STATE REAPPORTIONMENT
430 BANKS AND BANKING
450 COMMERCE/ICC RATES/ETC.
460 DEPORTATION
470 RACKETEER INFLUENCED AND CORRUPT
ORGANIZATIONS
480 CONSUMER CREDIT
490 CABLE/SATELLITE TV
890 OTHER STATUTORY ACTIONS
891 AGRICULTURAL ACTS
893 ENVIRONMENTAL MATTERS
895 FREEDOM OF INFORMATION ACT
899 ADMINISTRATIVE PROCEDURES ACT /
REVIEW OR APPEAL OF AGENCY DECISION
950 CONSTITUTIONALITY OF STATE STATUTES

OTHER STATUTES - "8" MONTHS DISCOVERY TRACK

410 ANTI-TRUST
850 SECURITIES / COMMODITIES / EXCHANGE

OTHER STATUTES - "0" MONTHS DISCOVERY TRACK

896 ARBITRATION
(Confirm / Vacate / Order / Modify)

*** PLEASE NOTE DISCOVERY
TRACK FOR EACH CASE TYPE.
SEE LOCAL RULE 26.3**

VII. REQUESTED IN COMPLAINT:

CHECK IF CLASS ACTION UNDER F.R.Civ.P. 23 DEMAND \$ _____

JURY DEMAND YES NO (CHECK YES ONLY IF DEMANDED IN COMPLAINT)

VIII. RELATED/REFILED CASE(S) IF ANY

JUDGE _____ DOCKET NO. _____

CIVIL CASES ARE DEEMED RELATED IF THE PENDING CASE INVOLVES: (CHECK APPROPRIATE BOX)

1. PROPERTY INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
2. SAME ISSUE OF FACT OR ARISES OUT OF THE SAME EVENT OR TRANSACTION INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
3. VALIDITY OR INFRINGEMENT OF THE SAME PATENT, COPYRIGHT OR TRADEMARK INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
4. APPEALS ARISING OUT OF THE SAME BANKRUPTCY CASE AND ANY CASE RELATED THERETO WHICH HAVE BEEN DECIDED BY THE SAME BANKRUPTCY JUDGE.
5. REPETITIVE CASES FILED BY PRO SE LITIGANTS.
6. COMPANION OR RELATED CASE TO CASE(S) BEING SIMULTANEOUSLY FILED (INCLUDE ABBREVIATED STYLE OF OTHER CASE(S)):

7. EITHER SAME OR ALL OF THE PARTIES AND ISSUES IN THIS CASE WERE PREVIOUSLY INVOLVED IN CASE NO. _____, WHICH WAS
DISMISSED. This case IS IS NOT (check one box) SUBSTANTIALLY THE SAME CASE.



January 5, 2022

SIGNATURE OF ATTORNEY OF RECORD

DATE