

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

ABG EPE IP, LLC,

Plaintiff,

v.

Civil Action No.

**AtoZ Global; Aubaile flagship store;
Beautiful&sister; Blu Sky; brandPAURO; BVT
GLOBAL; Choco's shop; Chugutova Olga; Cima di
Jazzi; Cleris Art Studio; CRHH; DecorStudioUA;
dinggangming; Dong Xiao Qing'shop; fondof2253;
gaoyane-meiguo; Goozon Official; GSFMMG;
guangzhoujiehanwangluokejiyouxiangongsi;
guangzhoushiyuexiuquhetaishangmaoyouxiangongsi;
Gunydok; gutlangg; hai kou bi ni fu ke ji you xian ze
ren gong si; Hanwenjie;
hefeiwengtengshangmaoyouxiangongsi;
HJLCOSBM; HJSHG; Honey-Love; HSRCOS-US;
huang fu shao hua; hulianzhi4867853; JinDa-Shang;
JUYIN-jp; Jy.Cozy; KeXuan Trading;
LANXIANYAOJIASHANGMAOJINGXIAOBU;
liangguangbin; ligalaxy; Limicounts;
linfenrongshengyuanwenhuayongpinyouxiangongsi;
Lingso; lizhng523699; LLJLoriduyf; MISOSA; MU
Zui; MyGiftsHouse; OPAstudios; OTA2; Plotnikovas
Store; Providing; Quynhanhstore; Rareeasy; RiF;
ruimingly; SakuraGinkgo; sha men shi xiang an qu
xiang dong lai xiao chi di;
shandongjinjiangdianzishangwuyouxiangongsi;
SHTEHAN; songpeichao; SunHuiDianZi; THE FINE
DISTRIBUTOR; THE NOSHAS; Tinzan-ux;
TUANTIENCY2K; Viking Craft Shop; Voilokov
Shop; VOXXW; wanghaiboY; WeiYaFang-HOME;
XDCGG;**

**xiangchengshiqinmiaoshangmaoyouxiangongsi;
XININGDANQICHUNSHANGMAOYOUXIANG
NGSI; XMXD; xuedinghao; yangyongqi; Yi Long
Shang Wu; yuan111; zhaolinzhi; Zhengcong;
zhoukoushichuanhuiqubaozhanggiucanyindian,**

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 AtoZ Global; Aubaile flagship store; Beautiful&sister; Blu Sky; brandPAURO; BVT GLOBAL; Choco's shop; Chugutova Olga; Cima di Jazz; Cleris Art Studio; CRHH; DecorStudioUA; dinggangming; Dong Xiao Qing'shop; fondof2253; gaoyane-meiguo; Goozon Official; GSFMMG; guangzhoujiehanwangluokejiyouxiangongsi; guangzhoushiyuexiuquhetaishangmaoyouxiangongsi; Gunydok; gutlangg; hai kou bi ni fu ke ji you xian ze ren gong si; Hanwenjie;

hefeiwengtengshangmaoyouxiangongsi; HJLCOSBM; HJSHG; Honey-Love; HSRCOS-US; huang fu shao hua; hulianzhi4867853; JinDa-Shang; JUYIN-jp; Jy.Cozy; KeXuan Trading; LANXIANYAOJIASHANGMAOJINGXIAOBU; liangguangbin; ligalaxy; Limicounts; linfenrongshengyuanwenhuayongpinyouxiangongsi; Lingso; lizhng523699; LLJLoriduyf; MISOSA; MU Zui; MyGiftsHouse; OPAstudios; OTA2; Plotnikovas Store; Providing; Quynhanhstore; Rareeasy; RiF; ruimingly; SakuraGinkgo; shamen shi xiang an qu xiang dong lai xiao chi di; shandongjinjiangdianzishangwuyouxiangongsi; SHTEHAN; songpeichao; SunHuiDianZi; THE FINE DISTRIBUTOR; THE NOSHAS; Tinzan-ux; TUANTIENY2K; Viking Craft Shop; Voilokov Shop; VOXXW; wanghaiboY; WeiYaFang-HOME; XDCGG; xiangchengshiqinmiaoshangmaoyouxiangongsi; XININGDANQICHUNSHANGMAOYOUXIANGONGSI; XMXD; xuedinghao; yangyongqi; Yi Long Shang Wu; yuan111; zhaolinzhi; Zhengcong; and zhoukoushichuanhuiqubaozhanggiucanyindian (“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: April 27, 2022.

Respectfully submitted,
THE SLADKUS LAW GROUP

s/ Carrie A. Hanlon

Carrie A. Hanlon

Ga. Bar No. 289725

E-mail: carrie@sladlaw.com

Jeffrey B. Sladkus

Ga. Bar No. 651220

E-mail: jeff@sladlaw.com

Jason H. Cooper

Ga. Bar No. 778884

E-mail: jason@sladlaw.com

1397 Carroll Drive

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

United States Patent and Trademark Office

Reg. No. 3,145,462

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

United States Patent and Trademark Office

Reg. No. 3,007,261

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

United States Patent and Trademark Office

Reg. No. 2,943,840

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

United States Patent and Trademark Office

Reg. No. 2,948,059

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

United States Patent and Trademark Office

Reg. No. 2,937,854

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

United States Patent and Trademark Office

Reg. No. 2,955,078

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. Kyfos

Director of the United States Patent and Trademark Office

Int. Cl.: 25

Prior U.S. Cls.: 22 and 39

Reg. No. 3,040,319

United States Patent and Trademark Office

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

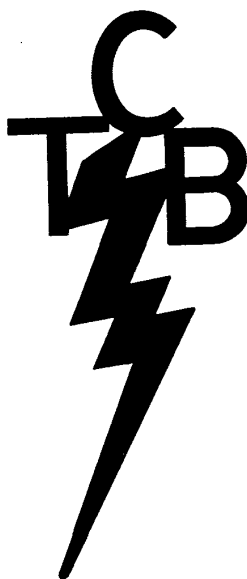
United States Patent and Trademark Office

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

Reg. No. 3,583,778

United States Patent and Trademark Office

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.

Civil Action No.

**AtoZ Global; Aubaile flagship store;
Beautiful&sister; Blu Sky; brandPAURO; BVT
GLOBAL; Choco's shop; Chugutova Olga; Cima di
Jazzi; Cleris Art Studio; CRHH; DecorStudioUA;
dinggangming; Dong Xiao Qing'shop; fondof2253;
gaoyane-meiguo; Goozon Official; GSFMMG;
guangzhoujiehanwangluokejiyouxiangongsi;
guangzhoushiyuexiuquhetaishangmaoyouxiangongsi;
Gunydok; gutlangg; hai kou bi ni fu ke ji you xian ze
ren gong si; Hanwenjie;
hefeiwengtengshangmaoyouxiangongsi;
HJLCOSBM; HJSHG; Honey-Love; HSRCOS-US;
huang fu shao hua; hulianzhi4867853; JinDa-Shang;
JUYIN-jp; Jy.Cozy; KeXuan Trading;
LANXIANYAOJIASHANGMAOJINGXIAOBU;
liangguangbin; ligalaxy; Limicounts;
linfenrongshengyuanwenhuayongpinyouxiangongsi;
Lingso; lizhng523699; LLJLoriduyf; MISOSA; MU
Zui; MyGiftsHouse; OPAstudios; OTA2; Plotnikovas
Store; Providing; Quynhanhstore; Rareeasy; RiF;
ruimingly; SakuraGinkgo; sha men shi xiang an qu
xiang dong lai xiao chi di;
shandongjinjiangdianzishangwuyouxiangongsi;
SHTEHAN; songpeichao; SunHuiDianZi; THE FINE
DISTRIBUTOR; THE NOSHAS; Tinzan-ux;
TUANTIENY2K; Viking Craft Shop; Voilokov
Shop; VOXXW; wanghaiboY; WeiYaFang-HOME;
XDCGG;**

**xiangchengshiqinmiaoshangmaoyouxiangongsi;
XININGDANQICHUNSHANGMAOYOUXIANG
NGSI; XMXD; xuedinghao; yangyongqi; Yi Long
Shang Wu; yuan111; zhaolinzhi; Zhengcong;
zhoukoushichuanhuiqubaozhanggiucanyindian,**

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 AtoZ Global; Aubaile flagship store; Beautiful&sister; Blu Sky; brandPAURO; BVT GLOBAL; Choco's shop; Chugutova Olga; Cima di Jazz; Cleris Art Studio; CRHH; DecorStudioUA; dinggangming; Dong Xiao Qing'shop; fondof2253; gaoyane-meiguo; Goozon Official; GSFMMG; guangzhoujiehanwangluokejiyouxiangongsi; guangzhoushiyuexiuquhetaishangmaoyouxiangongsi; Gunydok; gutlangg; hai kou bi ni fu ke ji you xian ze ren gong si; Hanwenjie;

hefeiwengtengshangmaoyouxiangongsi; HJLCOSBM; HJSHG; Honey-Love; HSRCOS-US; huang fu shao hua; hulianzhi4867853; JinDa-Shang; JUYIN-jp; Jy.Cozy; KeXuan Trading; LANXIANYAOJIASHANGMAOJINGXIAOBU; liangguangbin; ligalaxy; Limicounts; linfenrongshengyuanwenhuayongpinyouxiangongsi; Lingso; lizhng523699; LLJLoriduyf; MISOSA; MU Zui; MyGiftsHouse; OPAstudios; OTA2; Plotnikovas Store; Providing; Quynhanhstore; Rareeasy; RiF; ruimingly; SakuraGinkgo; shamen shi xiang an qu xiang dong lai xiao chi di; shandongjinjiangdianzishangwuyouxiangongsi; SHTEHAN; songpeichao; SunHuiDianZi; THE FINE DISTRIBUTOR; THE NOSHAS; Tinzan-ux; TUANTIENY2K; Viking Craft Shop; Voilokov Shop; VOXXW; wanghaiboY; WeiYaFang-HOME; XDCGG; xiangchengshiqinmiaoshangmaoyouxiangongsi; XININGDANQICHUNSHANGMAOYOUXIANGONGSI; XMXD; xuedinghao; yangyongqi; Yi Long Shang Wu; yuan111; zhaolinzhi; Zhengcong; and zhoukoushichuanhuiqubaozhanggiucanyindian (“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: April 27, 2022.

Respectfully submitted,
THE SLADKUS LAW GROUP

s/ Carrie A. Hanlon

Carrie A. Hanlon

Ga. Bar No. 289725

E-mail: carrie@sladlaw.com

Jeffrey B. Sladkus

Ga. Bar No. 651220

E-mail: jeff@sladlaw.com

Jason H. Cooper

Ga. Bar No. 778884

E-mail: jason@sladlaw.com

1397 Carroll Drive

Atlanta, GA 30318

Telephone: (404) 252-0900

Facsimile: (404) 252-0970

Attorneys for Plaintiff

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

ABG EPE IP, LLC,

Plaintiff,

v.

AtoZ Global, *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

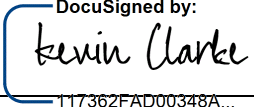
13. We can typically identify counterfeit versions of our products by visual inspection, including the type, labeling, packaging materials, and/or price at which the products are sold. With the assistance of The Sladkus Law Group, it has been confirmed that each Defendant is selling non-genuine products 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

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 EML. 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.



April 27, 2022

SIGNATURE OF ATTORNEY OF RECORD

DATE