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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Applicant: THORSPRING-ICELAND, INC.

Mark: ICELAND SPRING and Design

Serial No.: 75/704354

Int'l Class No: 032

Filed: MAY 13, 1999



01-10-2003

U.S. Patent & TMO/c/TM Mail Rcpt Dt. #36

Hon. Commissioner of Patents and Trademarks
Office of the Solicitor
P.O. Box 15667
Arlington, VA 22215

SUBMISSION OF FEDERAL COURT COMPLAINT

Sir:

In a Notice dated January 29, 2003, Frances S. Wolfson, Interlocutory Attorney, advised that Opposer's Petition to the Commission has been forwarded to the Office of the Assistant Commissioner of Trademarks. In the notice, it was footnoted that Opposer had failed to provide a copy of the Complaint. To correct this oversight, Opposer hereby files a copy of the Complaint in the case of *Swiss Valley Farms, Co. v. Iceland Spring, Inc. and Iceland Spring North America, Inc.*, pending in the United States District Court for the Southern District of Iowa, and docketed as Case No. 3:02-cv-80155.

Respectfully submitted,

SWISS VALLEY FARMS

By Glenn Johnson
Glenn Johnson
Attorney for Opposer

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February 3, 2003

<p style="text-align: center;">CERTIFICATE OF MAILING</p> <p>I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to Hon. Commissioner of Patents and Trademarks, Office of Solicitor, P.O. Box 15667, Arlington, VA 22215 on <u>February 3, 2003</u></p> <p style="text-align: center;"><u>Glenn Johnson</u> Glenn Johnson, Registered Representative</p>
--

cc: Howard G. Slavitt, Esq.
Slavitt & Gill, P.C.
1025 Thomas Jefferson, St. N.W.
Suite 425 West
Washington, DC 20007-5201

<p style="text-align: center;">CERTIFICATE OF SERVICE</p> <p>The undersigned hereby certifies that a copy of this instrument was served by fax and first class mail upon other counsel of record on <u>February 3, 2003</u></p> <p style="text-align: center;"><u>Glenn Johnson</u> Glenn Johnson</p>
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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
EASTERN DIVISION

SWISS VALLEY FARMS, CO.,)	
)	
Plaintiff,)	No. <u>3 02CY80155</u>
)	
vs.)	
)	
ICELAND SPRING, INC. and)	COMPLAINT and
ICELAND SPRING NORTH)	DEMAND FOR JURY
AMERICA, INC.,)	
)	
Defendants.)	

Swiss Valley Farms, Co. ("Swiss Valley"), Plaintiff, for its Complaint against Defendants, Iceland Spring, Inc. and Iceland Spring North America, Inc. (Defendants collectively referred to as "Iceland Spring") states:

I.

JURISDICTION AND VENUE

1. This action arises under the trademark and unfair competition laws of the United States pursuant to Section 43 of the Lanham Act, 15 USC §1125(a), Section 32(1) of the Lanham Act, 15 USC §1114(1), and 28 USC §1338(a). Pursuant to 28 U.S.C. §1367, the Court has supplement jurisdiction over the state law claim asserted in this Complaint.

2. Venue over this action is proper pursuant to the provisions of 28 USC §1391.

II.

SWISS VALLEY FARMS, CO.

3. Swiss Valley is an Iowa corporation having its corporate headquarters located at 21100 Holden Drive, Davenport, Scott County, Iowa.

4. Swiss Valley is in the business of the manufacture, distribution and sale of food products and, further, in the business of providing agricultural services.

5. The food products which are manufactured, distributed, and/or sold by Swiss Valley include milk products, cheeses, cultured products, and fluid products.

6. Swiss Valley's fluid product line includes products such as lemonade, iced tea, fruit punch, orange drink, juices, and bottled water.

III.

DEFENDANTS

7. On information and belief, Iceland Spring, Inc. is a foreign entity that is incorporated under the laws of Iceland. The corporate headquarters of Iceland Spring, Inc. are located at 110 Reykjavik, Iceland.

8. Iceland Spring, Inc. is in the business of bottling, distributing and selling bottled water under the ICELAND SPRING mark.

9. Iceland Spring North America, Inc. is a corporation organized and existing under the laws of the state of Delaware.

10. On information and belief, Iceland Spring North America, Inc., Defendant, is a subsidiary corporation of Defendant Iceland Spring, Inc.

11. Iceland Spring North America, Inc. maintains its corporate headquarters at 237 Jonathan Drive, Stamford, CT 06903.

12. On information and belief, Iceland Spring North America, Inc. is in the business of selling and distributing bottled water under the ICELAND SPRING mark.

13. The members of the management team for Iceland Spring, Inc. and Iceland Spring North America, Inc. are nearly identical.

IV.

GENERAL ALLEGATIONS

14. Since 1988, Swiss Valley has distributed and sold bottled water under the mark ICY SPRINGS.

15. Swiss Valley sought trademark registration for the mark ICY SPRINGS on April 25, 1988.

16. On June 12, 1990, the United States Patent and Trademark Office issued Registration No. 1,601,254 to Swiss Valley for the mark ICY SPRINGS, which registration was for:

Bottled drinking water.

Registration was obtained in International Class 32.

17. The mark ICY SPRINGS is registered on the Principal Register maintained by the United States Patent and Trademark Office.

18. Since 1988 Swiss Valley has continuously distributed and sold bottled water under the mark ICY SPRINGS.

19. The mark ICY SPRINGS is currently a valid and enforceable trademark under the laws of the United States.

20. Beginning on or about 2001, Iceland Spring, Inc. began to bottle, distribute and/or sell bottled water within the United States under the mark ICELAND SPRING.

21. On information and belief, Iceland Spring North America, Inc. assisted Iceland Spring, Inc. within the United States in the sale and distribution of bottled water under the mark ICELAND SPRING.

22. On July 31, 2001, Iceland Spring, Inc. filed an application with the United States Patent and Trademark Office seeking to register the mark ICELAND SPRING, which application was assigned Serial No. 76292801.

23. The application for registration of the mark ICELAND SPRING states that the Goods and Services sought to be covered by the mark are:

Non-alcoholic beverages, namely natural spring water.

Registration is sought in International Class 32.

24. Swiss Valley has expended substantial sums of money and effort in conjunction with its ICY SPRINGS bottled water product.

25. The mark ICY SPRINGS is identified with Swiss Valley and, further, is identified with the high level of quality and service provided by Swiss Valley.

26. Defendants Iceland Spring are now offering bottled water goods under the mark ICELAND SPRINGS which are identical to the bottled water goods offered by Swiss Valley offered under the mark ICY SPRINGS.

27. On or about December 13, 2002, a representative of Swiss Valley purchased ICELAND SPRING bottled water from the New Pioneer Co-op located in Johnson County, Iowa.

28. Defendants Iceland Spring's advertising, marketing materials, sales materials and the conduct of its business under the mark, ICELAND SPRING, is confusingly similar to Swiss Valley's ICY SPRINGS mark.

29. On September 11, 2002, legal counsel for Swiss Valley notified Defendants Iceland Spring of the rights owned and held by Swiss Valley in the mark ICY SPRINGS and the infringement of said mark by Defendants.

30. Defendants Iceland Spring continue to offer its bottled water products under the mark ICELAND SPRING with the knowledge that it is an unlawful and infringing use of Swiss Valley's ICY SPRINGS mark and will likely cause confusion, mistake, or deception.

31. Upon information and belief, Defendants Iceland Spring have used and continue to use its mark ICELAND SPRING throughout the state of Iowa, and throughout the United States in interstate commerce.

32. Defendants Iceland Spring use of the mark ICELAND SPRING infringes upon and unfairly competes with Swiss Valley and the use of Swiss Valley's mark ICY SPRINGS and, further, in ways that are likely to cause confusion, mistake, or deception among consumers and potential consumers of Swiss Valley's goods and services.

33. On information and belief, Defendants Iceland Springs are marketing, advertising, and soliciting customers and potential customers of Swiss Valley throughout the United States and within the state of Iowa with materials, advertising and internet images that misleadingly display the mark ICELAND SPRING, which mark is confusingly similar with Swiss Valley's mark ICY SPRINGS. Defendant's

unauthorized use of a mark confusingly similar with Swiss Valley's mark ICY SPRINGS is likely to cause confusion, mistake or deception among consumers and potential consumers of Swiss Valley's goods and services.

34. Defendants Iceland Springs are not related to Swiss Valley, nor do Defendants Iceland Springs have any authority to use marks confusingly similar to those marks owned by Swiss Valley, including Swiss Valley's mark ICY SPRINGS.

35. Upon information and belief Defendants Iceland Springs have intentionally, willfully and wantonly violated and infringed the rights held by Swiss Valley in its mark ICY SPRINGS, and Defendants Iceland Springs have further engaged in unfair and deceptive competition with Swiss Valley.

V.

FIRST CAUSE OF ACTION
(FEDERAL UNFAIR COMPETITION)

36. Swiss Valley incorporates by reference herein all allegations set forth in ¶¶1-35 of this Complaint.

37. In connection with Defendants Iceland Spring's marketing or sale of goods and services in interstate commerce, said Defendants have used marks, symbols, devices or logos identical to, similar to, or confusingly similar with Swiss Valley's mark ICY SPRINGS without Swiss Valley's authorization. Such use constitutes false

designation of origin and false descriptions and representations of Defendants Iceland Spring's business, goods and services, and falsely portrays Defendants Iceland Spring and their business, goods and services as being associated with, sponsored by, approved by, or related to Swiss Valley.

38. Defendants Iceland Spring's acts are likely to confuse, mislead or deceive customers, purchasers and potential customers of Swiss Valley and of Defendants Iceland Spring, as well as to confuse, mislead or deceive other members of the public, as to the origin, sponsorship, or affiliation of Defendants Iceland Spring's business, goods and services, to the extent that it may cause such persons to believe in error that Defendants Iceland Spring's use of marks, symbols, devices or logos identical to, similar to or confusingly similar with Swiss Valley's mark ICY SPRINGS has been authorized, sponsored or approved by Swiss Valley and its business, goods and services are connected with, affiliated with or authorized by Swiss Valley.

39. Defendants Iceland Spring's acts are infringing Swiss Valley's mark and, further, constitute misleading or false descriptions and false designations or origin of Defendant's business, goods and services. Said acts have affected interstate commerce in violation of §43 of the Lanham Act, 15 USC §1125(a), and have resulted in damage and harm to Swiss Valley.

40. Swiss Valley is further entitled to recover attorneys fees based upon the willful acts and conduct of Defendants Iceland Spring in conjunction with the use of their marks, symbols, devices or logos identical to, similar to, or confusingly similar with Swiss Valley's mark, ICY SPRINGS.

VI.

SECOND CAUSE OF ACTION (STATE UNFAIR COMPETITION)

41. Swiss Valley incorporates by reference herein all allegations set forth in ¶¶1-40 of this Complaint.

42. In connection with Defendants Iceland Spring's marketing or sale of goods and services in interstate commerce, said Defendants have used marks, symbols, devices or logos identical to, similar to, or confusingly similar with Swiss Valley's mark ICY SPRINGS without Swiss Valley's authorization. Such use constitutes false designation of origin and false descriptions and representations of Defendants Iceland Spring's business, goods and services, and falsely portrays Defendants Iceland Spring and their business, goods and services as being associated with, sponsored by, approved by, or related to Swiss Valley.

43. Defendants Iceland Spring's acts are likely to confuse, mislead or deceive customers, purchasers and potential customers of Swiss Valley and of Defendants

Iceland Spring, as well as to confuse, mislead or deceive other members of the public, as to the origin, sponsorship, or affiliation of Defendants Iceland Spring's business, goods and services, to the extent that it may cause such persons to believe in error that Defendants Iceland Spring's use of marks, symbols, devices or logos identical to, similar to or confusingly similar with Swiss Valley's mark ICY SPRINGS has been authorized, sponsored or approved by Swiss Valley and its business, goods and services are connected with, affiliated with or authorized by Swiss Valley.

44. Defendants Iceland Spring's acts are infringing Swiss Valley's mark and, further, constitute misleading or false descriptions and false designations or origin of Defendant's business, goods and services. Said acts are in violation of state law prohibiting such acts of unfair competition, and have resulted in damage and harm to Swiss Valley.

45. Swiss Valley is further entitled to recover attorneys fees based upon the willful acts and conduct of Defendants Iceland Spring in conjunction with the use of their marks, symbols, devices or logos identical to, similar to, or confusingly similar with Swiss Valley's mark, ICY SPRINGS.

VII.

THIRD CAUSE OF ACTION
(FEDERAL TRADEMARK INFRINGEMENT)

46. Swiss Valley incorporates by reference herein all allegations set forth in ¶¶1-45 of this Complaint.

47. Defendants Iceland Spring have knowingly and willfully used in interstate commerce marks, symbols, devices or logos identical to, similar to or confusingly similar with Swiss Valley's mark ICY SPRINGS. Such use infringes upon the trademark rights owned and held by Swiss Valley in the mark ICY SPRINGS.

48. The acts of Defendants complained of herein constitute infringement of Plaintiff's federally registered mark in violation of 15 U.S.C. § 1114 (1).

49. By reason of Defendants Iceland Spring's acts of infringement of Swiss Valley's mark, ICY SPRINGS, Swiss Valley has suffered monetary damages and is further entitled to recover all Defendants Iceland Spring's profits earned in connection with its wrongful use of confusingly similar marks, symbols, devices or logos, and to recover the costs of this action.

50. Swiss Valley is further entitled to recover attorneys fees based upon the willful acts and conduct of Defendants Iceland Spring in conjunction with the use of their marks, symbols, devices or logos identical to, similar to, or confusingly similar with Swiss Valley's mark, ICY SPRINGS.

VIII.

FOURTH CAUSE OF ACTION **(STATE TRADEMARK INFRINGEMENT)**

51. Swiss Valley incorporates by reference herein all allegations set forth in ¶¶ 1-50 of this Complaint.

52. Defendants Iceland Spring have knowingly and willfully used in interstate commerce marks, symbols, devices or logos identical to, similar to or confusingly similar with Swiss Valley's mark ICY SPRINGS. Such use infringes upon the trademark rights owned and held by Swiss Valley in the mark ICY SPRINGS.

53. The acts of Defendants complained of herein constitute infringement of Plaintiff's mark, ICY SPRINGS, in violation of laws of the state of Iowa.

54. By reason of Defendants Iceland Spring's acts of infringement of Swiss Valley's mark, ICY SPRINGS, Swiss Valley has suffered monetary damages and is further entitled to recover all Defendants Iceland Spring's profits earned in connection with its wrongful use of confusingly similar marks, symbols, devices or logos, and to recover the costs of this action.

50. Swiss Valley is further entitled to recover attorneys fees based upon the willful acts and conduct of Defendants Iceland Spring in conjunction with the use of their marks, symbols, devices or logos identical to, similar to, or confusingly similar with Swiss Valley's mark, ICY SPRINGS.

IX.

COUNT V
(STATE UNJUST ENRICHMENT)

42. Swiss Valley incorporates by reference herein all allegations set forth in ¶¶1-41 of this Complaint.

43. Defendants Iceland Spring knowing and willful use of marks, symbols, devices or logos identical to, similar to or confusingly similar with Swiss Valley's mark ICY SPRINGS have benefited Defendants Iceland Spring.

44. By reason of Defendants Iceland Spring's acts, said Defendants have benefited at the expense of Swiss Valley.

45. It would be unjust to allow Defendants Iceland Spring to retain the benefit obtained by use of marks, symbols, devices or logos identical to, similar to or confusingly similar with Swiss Valley's mark ICY SPRINGS.

PRAYER

WHEREFORE, Swiss Valley Farms, Co. requests the following relief in conjunction with the allegations set forth above in this Complaint:

A. Entry of an Order granting preliminary injunctive relief enjoining and restraining Defendants Iceland Spring, their officers, directors, agents, servants, employees, members, successors, assigns, and all those in privity with them from:

1) Using the mark, ICY SPRINGS, or any confusingly similar mark, symbol, device, logo, word, term or name, or any combination thereof, in connection with their business or the sale of any goods and services in any manner or context whatsoever without prior written authorization from Swiss Valley;

2) Making any statement or representation and/or performing any acts likely to lead the public, or individual members of the public, to incorrectly believe that Defendants Iceland Spring are directly or indirectly associated or connected with, sponsored by, or approved by Swiss Valley;

3) Engaging in any acts or activities calculated to trade upon Swiss Valley's mark, ICY SPRINGS, or the reputation or goodwill of Swiss Valley, or in any manner to falsely designate Defendants Iceland Spring's goods and/or services as originating with, being associated with, sponsored by, or approved by Swiss Valley; and

4) Committing any other acts which infringe or otherwise unfairly advantage or enrich Defendants Iceland Spring, or which constitute an unfair trade practice, unfair competition, or false advertising; and

B. Entry of an Order granting permanent injunctive relief enjoining and restraining Defendants Iceland Spring, their officers, directors, agents, servants, employees, members, successors, assigns, and all those in privity with them from:

1) Using the mark, ICY SPRINGS, or any confusingly similar mark, symbol, device, logo, word, term or name, or any combination thereof, in connection with their business or the sale of any goods and services in any manner or context whatsoever without prior written authorization from Swiss Valley;

2) Making any statement or representation and/or performing any acts likely to lead the public, or individual members of the public, to incorrectly believe that Defendants Iceland Spring are directly or indirectly associated or connected with, sponsored by, or approved by Swiss Valley;

3) Engaging in any acts or activities calculated to trade upon Swiss Valley's mark, ICY SPRINGS, or the reputation or goodwill of Swiss Valley, or in any manner to falsely designate Defendants Iceland Spring's goods and/or services as originating with, being associated with, sponsored by, or approved by Swiss Valley; and

4) Committing any other acts which infringe or otherwise unfairly advantage or enrich Defendants Iceland Spring, or which constitute an unfair trade practice, unfair competition, or false advertising; and

C. Entry of an Order requiring Defendants Iceland Spring to deliver up for destruction:

1) Any product, books, printed materials, CD-roms, diskettes, publications, promotional materials, video or audio materials, packages, labels, cartons, boxes, signs, prints, wrappers, receptacles, advertising, or documents or images stored or transmitted by any electronic means of any type bearing the mark ICY SPRINGS, or any confusingly similar word, term, mark, symbol, device or logo, or combination thereof; and

2) All stationary, business cards, invoices, catalogs, advertising materials, or any other material of any type bearing the mark ICY SPRINGS, or any confusingly similar word, term, mark, symbol, device or logo, or combination thereof; and

D. Entry of an Order requiring Defendants Iceland Spring to file with the Court within thirty days after issuance of any final injunction in this action, or within such other reasonable time as the Court may direct, a report in writing under oath setting forth in detail the manner and form in which it has complied with the provisions

of said injunction and order to destroy all material having the same or confusingly similar mark to Swiss Valley's mark, ICY SPRINGS; and

E. Entry of an Order requiring Defendants Iceland Spring to file with the Court and serve upon counsel for Swiss Valley an accounting of any and all sales of goods or services and, further, an accounting of any and all profits received by Defendants Iceland Spring from the distribution or sale of their goods or services in any way connected with, marketed with, or otherwise advertised or sold in conjunction with Defendants Iceland Spring's use of any words, terms, marks, devices, symbols, or logos identical to, similar to, or confusingly similar with Swiss Valley's mark, ICY SPRINGS;

F. Entry of an Order requiring Defendants Iceland Spring to pay over to Swiss Valley all said Defendants' profits earned as a consequence of the foregoing acts, and that such award be trebled;

G. Entry of an Order requiring Defendants Iceland Spring to pay all compensatory damages sustained by Swiss Valley arising out of and relating to the foregoing acts, and that such award be trebled; and

H. Entry of an Order requiring Defendants Iceland Spring to pay Swiss Valley all reasonable attorneys fees and investigation costs incurred by Swiss Valley as a consequence of the foregoing action in connection with this action; and

I. Entry of an Order requiring Defendants Iceland Spring to pay to Swiss Valley all of its taxable costs and disbursements of this action;

J. Entry of an Order canceling any trademark registration for the mark ICELAND SPRING, if said application for registration may be granted by the United States Patent and Trademark Office.

K. Entry of an Order providing such other and further relief as may be afforded in law or equity.

DEMAND FOR JURY

Swiss Valley Farms, Co. hereby demands trial by jury on all issues presented in this case.

Respectfully submitted,



GLENN JOHNSON LI0002622
for
SHUTTLEWORTH & INGERSOLL, P.C.
500 Firststar Bank Bldg., P.O. Box 2107
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TRADEMARK GENERAL QUERY AS OF: 02/10/03 08:36:06

SERIAL NUMBER: 75704354	FILING DATE: 05/13/1999	
REG. NUMBER: 0000000	REG. DATE:	
REGISTER: PRINCIPAL	MARK TYPE: TRADEMARK	
FILED USE: NO	CURRENTLY USE: YES	AMENDED USE: NO
FILED ITU: YES	CURRENTLY ITU: NO	AMENDED ITU: NO
FILED 44D: YES	CURRENTLY 44D: NO	AMENDED 44D: NO
FILED 44E: NO	CURRENTLY 44E: YES	AMENDED 44E: NO

EXAMINER: 76740-AN, GI HYUN

EXMR LO: 101

LO ASSIGNED:
101

LOCATION: 845-TTAB

DATE IN LOC: 02/06/2003

CHRG TO LOC: 450-ASSISTANT COMMISSIONER FOR TRADEMARKS

CHRG TO: NONE

STATUS: 774 - OPPOSITION PENDING

STATUS DATE: 01/09/2003

A/R EXAMINER: NO A/R EXAMINER ASSIGNED

PUB DATE: 07/09/2002	DATE	DATE CANCELLED:
	ABANDONED:	
SECTION 8: NO	SECTION 15: NO	ASSIGNMENT: NO
RENEWAL FILED: NO	RENEWAL DATE:	DATE AMENDED REG:
CLASSES ACTIVE: 01		

DATE	CD	TYPE	DESCRIPTION	NUM	NUM
01/13/2003	OP.T	T	OPPOSITION TERMINATED NO. 999999	019	154306
01/09/2003	OP.I	T	OPPOSITION INSTITUTED NO. 999999	018	154306
12/23/2002	MAIL	I	PAPER RECEIVED	017	000000
08/15/2002	ETOF	T	EXTENSION OF TIME TO OPPOSE RECEIVED AT TTAB	016	000000
07/09/2002	PUBO	A	PUBLISHED FOR OPPOSITION	015	000000
06/19/2002	NPUB	O	NOTICE OF PUBLICATION	014	000000
01/18/2002	CNSA	O	APPROVED FOR PUB - PRINCIPAL REGISTER	013	000000
01/18/2002	IUAA	P	USE AMENDMENT ACCEPTED	012	000000
10/25/2001	CRFA	I	COMMUNICATION RECEIVED FROM APPLICANT	011	000000
06/13/2001	CRFA	I	COMMUNICATION RECEIVED FROM APPLICANT	010	000000
09/26/2001	AUPC	I	AMENDMENT TO USE PROCESSING COMPLETE	009	000000
06/13/2001	IUAF	S	USE AMENDMENT FILED	008	000000
06/18/2001	CNRT	O	NON-FINAL ACTION MAILED	007	000000
12/01/2000	CNSL	F	LETTER OF SUSPENSION MAILED	006	000000
06/19/2000	CNSL	F	LETTER OF SUSPENSION MAILED	005	000000
03/08/2000	CRFA	I	COMMUNICATION RECEIVED FROM APPLICANT	004	000000
09/09/1999	CNRT	F	NON-FINAL ACTION MAILED	003	000000
08/23/1999	DOCK	D	ASSIGNED TO EXAMINER	002	076740
08/19/1999	DOCK	D	ASSIGNED TO EXAMINER	001	074307

CORRESPONDENCE**Attorney:**

H. DAVID STARR, ESQ.

**Attorney Docket
Number:**

None

**Correspondence
Address:**

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 5 WEST
 WASHINGTON, DC 20007

**Domestic
Representative:**

SLAVIT & GILL, P.C.

OTHER INFORMATION

Mark Drawing Cd: 3-AN ILLUSTRATION DRAWING WHICH INCLUDES WORD (S)/LETTER(S)/NUMBER(S)
Pseudomark: ICELAND SPRING
Design Search Codes: 06.01.04, 06.09.06 and 26.11.01
Section 8 In Part: NO
Repub Sec 12C: NO **Pub Date 12C:**
Change In Registration: NO
TTAB Decision: NO
Lost Case: NO

PRIOR OWNER INFORMATION

PARTY TYPE: 10-ORIGINAL APPLICANT - FIRST NAME
NAME: Thorspring-Iceland, Inc.
ADDRESS: Kringlunni 8-12
103 REYKJAVIK ICELAND
ENTITY: 09-JOINT STOCK COMPANY
CITIZENSHIP: ICELAND