

ESTTA Tracking number: **ESTTA579849**

Filing date: **01/03/2014**

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

**Notice of Opposition**

Notice is hereby given that the following party opposes registration of the indicated application.

**Opposer Information**

Name	International Products Group LLC
Granted to Date of previous extension	01/04/2014
Address	406 W. South Jordan Pkwy Suite 420 South Jordan, UT 84085 UNITED STATES
Party who filed Extension of time to oppose	IPG Holdings, LLC IPG Holdings, LLC
Relationship to party who filed Extension of time to oppose	International Products Group, LLC is formerly known and dba IPG Holdings, LLC

Correspondence information	International Products Group LLC 406 W. South Jordan Pkwy Suite 420 South Jordan, UT 84085 UNITED STATES johng@inventorshelp.com
----------------------------	--

**Applicant Information**

Application No	79131631	Publication date	11/05/2013
Opposition Filing Date	01/03/2014	Opposition Period Ends	01/04/2014
International Registration No.	1164173	International Registration Date	04/11/2013
Applicant	ZheJiang LvQing Bamboo Technology Co., Ltd. Xiaoshu Industry Park Lingang CNX CNX		

**Goods/Services Affected by Opposition**

Class 003. First Use: 0 First Use In Commerce: 0 All goods and services in the class are opposed, namely: Soap; hair lotions; shampoos; stain removers; cosmetics; perfumery; essential oils; perfumes; dentifrices; potpourris fragrances
---

**Grounds for Opposition**

Other	likelihood of confusion
-------	-------------------------

Attachments	Notice_with_Exhibit.pdf(2226363 bytes )
-------------	---

## Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/John D. Gugliotta/
Name	International Products Group LLC
Date	01/03/2014

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

In the matter of trademark application Serial No. **79131631**  
For the mark **GREEN QUEEN**  
Published in the Official Gazette on **November 5, 2013**

IPG Holdings, LLC	)	
	)	
Opposer,	)	Opposition No. _____
	)	
v.	)	
	)	
ZheJiang LvQing Bamboo Technology Co., Ltd.	)	
	)	
Applicant.	)	
_____	)	

**NOTICE OF OPPOSITION**

Opposer International Products Group, LLC, dba IPG Holdings, LLC (“IPG”) , a Utah corporation having a principal place of business at 406 W. South Jordan Parkway, Suite 420, South Jordan UT 84095, believes that it will be damaged by the issuance of a registration for the mark GREEN QUEEN ( the “GREEN QUEEN mark”), as applied for in Application Serial No. 79/131,631 filed on April 11, 2013 by applicant ZheJiang LvQing Bamboo Technology Co., Ltd, (“ZheJiang”) a China Limited Company having an address of record at Xiaoshu Industry Park Lingang Economic Zone, Anji County, 313300 Zhejiang CHINA.

The above-identified opposer believes that it will be damaged by registration of the mark shown in the above-identified application, and hereby opposes the same.

The grounds for opposition are as follows:

1. Since at least as far back at 2005, the IPG has been in the business of formulating health and beauty products targeted as having superior performing formulations and using authentic natural ingredients. IPG provides direct, under their own label, or as an original product manufacturer for others under a “house brand” or under license, such products in the health and beauty areas that they create, manufacture, deliver and market. IPG delivers products using world class technology and efficacy, with innovative products that strive to be “best in class” in natural and organic beauty areas. Such products further strive to out-perform harsh synthetic formulas.

2. IPG is currently positioned strategically within the industry as having creative and innovative designs and concepts that they are capable of developing into products. Further, IPG has manufacturing, fulfilment and logistics capabilities. IPG has dedicated themselves to helping clients create and formulate Natural, NPA-Certified, Vegan and Organic products that are in EVERY channel of distribution (Prestige, Luxury, Specialty, Mass, Direct Selling, Salon, and TV Shopping Networks).

3. IPG currently holds numerous trademarks for bath and shower gel, beauty gels, beauty masks, beauty serums, body emulsions, body lotions, body oils, cosmetic creams, cosmetics, deodorants for body care, essential oils, eye gels, eye lotions, face and body lotions, hair care preparations, hair lotions, hair styling preparations, hand lotions, make up foundations, make-up powder, non-medicated foot lotions, non-medicated serums for use on face, skin, eye, lips, non-medicated skin care preparations, non-medicated toiletries, perfume, shampoos, skin care products, namely, non-medicated skin serum, skin creams, skin moisturizers; skin soap, and under-eye enhancers. These products have been developed, made or sold under various names,

including: HONEST TO GOODNESS®; HEAL THYSELF®; IT'S ALL GOOD®; BODY SUSHI®; GREEN FARMACIA APOTHECARIES®; GREEN IS THE NEW BLACK®; I HEART GREEN®; NATCH™; BRO™; HEAD OVER HEELS™; POSH PET™; and others.

4. Since about October 2009, Opposer IPG had developed and is marketing products under the name GREEN QUEEN™ that include, but are not limited to, anti-aging enzyme masks, face washes, face creams and the like. Samples of these products are shown in attachments hereto attached as Exhibit A, and are incorporated by reference herein. As a result of this use, IPG currently has common law rights in the GREEN QUEEN mark in connection with these goods in International Class 003.

5. The applicant ZheJiang's GREEN QUEEN mark is identical to that used by Opposer.

6. The applicant ZheJiang's product begin registered under the mark GREEN QUEEN are similar to Opposer's goods, namely: soap; hair lotions; shampoos; stain removers; cosmetics; perfumery; essential oils; perfumes; dentifrices; and potpourris fragrances, all in International Class 003.

7. ZheJiang is not affiliated with nor connected with IPG or its services; nor has IPG endorsed or sponsored ZheJiang in its products.

8. As a result of the nature and quality of IPG's products and services, its widespread use of the GREEN QUEEN mark, and the high degree of reputational recognition by those within the distribution channel for health and beauty products, ZheJiang's use of the GREEN QUEEN mark creates a false suggestion or an affiliation or connection between ZheJiang and IPG, where none exists.

9. IPG has no control over the nature and quality of the ingredients or its

manufacturing for the goods offered by ZheJiang under the GREEN QUEEN mark. IPG's reputation and goodwill will be damages and the value of IPG's registered and common law marks jeopardized by ZheJiang's registration of the GREEN QUEEN mark. Because of the likelihood of confusion between the parties' marks, any defects, improprieties, or faults found with ZheJiang's goods marketed under the GREEN QUEEN mark would negatively reflect upon and injure the reputation that IPG has established for the goods and services it offers, including those in connection with the GREEN QUEEN mark.

10. Registration of the mark herein opposed will damage IPG because ZheJiang's mark is likely, when used in connection with the goods described in International Class 003 of the application, to cause confusion, or to cause mistake or to deceive. Therefore, the GREEN QUEEN mark of the Applicant ZheJiang is unregistrable under 15 U.S.C. §1052 , and should be refused registration.

Wherefore, IPG prays that this Opposition be sustained, and that Application Serial No. 79/131,631 as it relates to International Class 003 be refused.

Respectfully submitted,

John D. Gugliotta, Esq.  
Registration No. 36538

Law Offices of John D. Gugliotta, P.E., Esq., LPA  
P.O. Box 506  
Richfield, OH 44286  
P (330) 253-2225  
F (330) 253-6658

**Exhibit A**

# GREENQUEEN



ANTI-AGING



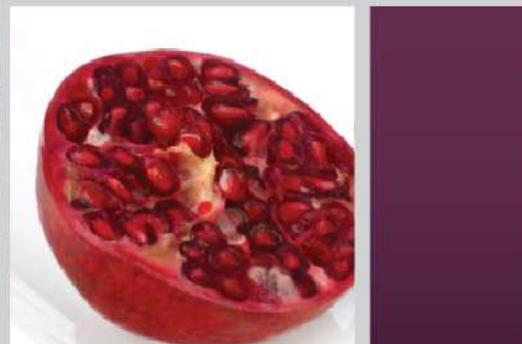
QUENCH YOUR SKIN



BRIGHTEN COMPLEXION



DETOXIFY SKIN



**GREENQUEEN** is a luxury skincare brand known for its uniquely high concentration of natural, high performance ingredients. The line stands out for the extensive research and technological innovation invested in each ground-breaking formula. **GREENQUEEN** offers extraordinary results to modern women who demand high-performance, health-enhancing products that are both efficient and effective.

Brightening, replenishing, hydrating, smoothing, energizing, moisturizing... These are the things that EVERY woman is looking for in her skincare regimen. Imagine a line of High Performing Beauty Masks that will achieve EVERY one of these needs?

**GREENQUEEN** is a line of at-home beauty masks that rival an expensive spa-like treatment. Extremely active, yet therapeutic ingredients are the story behind these beauty masks that will wrap your skin in moisture, detoxify and remove impurities, brighten your complexion, and fight against aging in just 10 minutes. Formulated with velvety whipped textures, these intensive beauty masks are targeted for specific needs in mind. After one use, you will experience softer, more supple, younger-looking skin that glows.

# GREENQUEEN



This antioxidant-rich, enzymatic face mask contains super fruit extracts that actively get rid of dead skin cells, cleanse and nourish the skin. High concentrations of polyphenols (potent antioxidants) and vitamins A, C & E help to refresh your complexion leaving skin looking healthy, youthful, and radiant. This mask works to re-texturize skin in just 10 minutes revealing a fresh, soft, supple complexion. Formulated specifically to aggressively protect against the signs of aging such as environmental damage, lines, wrinkles and loss of elasticity.

anti-aging enzyme mask



Brightening Apple Butter Mask is a luxurious mask for normal to dry skin types with uneven complexion. Packed with powerful anti-inflammatories and decongesting natural ingredients to restore a youthful appearance to the skin. This mask helps to brighten skin, reduce the appearance of dark spots while working against the signs of aging.

brightening apple butter mask



Quench your thirsty skin with this luxuriously whipped moisture mask with a ridiculously decadent pumpkin scent. Formulated with Pumpkin, Apple extract, Nutmeg, Clove, and Vitamin E to nourish, renew, smooth and refine your skin. This is a quick and easy spa-like face treatment that will leave skin healthy and younger looking... absolutely incredible results!

rescue moisture pumpkin mask



This detoxifying treatment mask combines the therapeutic properties of Ginger and Wasabi to effectively cleanse the skin from toxins and remove excess waste. Green Tea extract further aids in neutralizing free radicals and promoting a more balanced complexion. The natural warming properties of this mask offer a stimulating effect that increases circulation and help to ease inflammation. Aloe Vera moisturizes skin allowing for healthy substances to penetrate deep into the skin for maximum results.

detox ginger wasabi mask