

ESTTA Tracking number: **ESTTA595833**

Filing date: **04/01/2014**

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	Chrysler Group LLC
Granted to Date of previous extension	04/02/2014
Address	1000 Chrysler Drive CIMS 485-13-32 Auburn Hills, MI 48326 UNITED STATES

Correspondence information	Kristen I. Spano Senior Trademark Counsel Chrysler Group LLC 1000 Chrysler Drive CIMS 485-13-32 Auburn Hills, MI 48326 UNITED STATES kis5@chrysler.com, mam239@chrysler.com, dh700@chrysler.com Phone:248-512-6475
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Applicant Information

Application No	86005240	Publication date	12/03/2013
Opposition Filing Date	04/01/2014	Opposition Period Ends	04/02/2014
Applicant	Jeen International Corporation 24 Madison Road Fairfield, NJ 07004 NJ		

Goods/Services Affected by Opposition

Class 001. First Use: 1996/04/19 First Use In Commerce: 1996/04/19 All goods and services in the class are opposed, namely: Chemicals for use in the manufacture of cosmetic, personal care and pharmaceutical products, namely, methyl taurate esters

Grounds for Opposition

Priority and likelihood of confusion	Trademark Act section 2(d)
Dilution	Trademark Act section 43(c)

Marks Cited by Opposer as Basis for Opposition

U.S. Registration No.	526175	Application Date	02/13/1943
Registration Date	06/13/1950	Foreign Priority Date	NONE

Word Mark	JEEP
Design Mark	
Description of Mark	NONE
Goods/Services	Class 012. First use: First Use: 1940/11/20 First Use In Commerce: 1943/02/05 AUTOMOBILES AND STRUCTURAL PARTS THEREOF

U.S. Registration No.	1081322	Application Date	05/19/1976
Registration Date	01/03/1978	Foreign Priority Date	NONE
Word Mark	JEEP		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 037. First use: First Use: 1948/00/00 First Use In Commerce: 1948/00/00 AUTOMOTIVE VEHICLE REPAIR AND MAINTENANCE SERVICE		

U.S. Registration No.	1130015	Application Date	07/24/1978
Registration Date	01/29/1980	Foreign Priority Date	NONE
Word Mark	JEEP		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 025. First use: First Use: 1974/03/29 First Use In Commerce: 1974/03/29 CLOTHING-NAMELY, TROUSERS, JACKETS, [BLAZERS,] RAIN WEAR, HEAD WEAR, T-SHIRTS, SWEAT SUITS, WARM-UP SUITS, SWEATERS, COATS, GLOVES, [HOODS,] AND SCARVES		

U.S. Registration No.	1129828	Application Date	07/25/1978
Registration Date	01/29/1980	Foreign Priority Date	NONE
Word Mark	JEEP		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 008. First use: First Use: 1974/03/29 First Use In Commerce: 1974/03/29 HAND TOOLS AND INSTRUMENTS-NAMELY, KNIVES, [FORKS, AND SPOONS]		

U.S. Registration No.	1134153	Application Date	07/31/1978
Registration Date	04/29/1980	Foreign Priority Date	NONE
Word Mark	JEEP		
Design Mark			
Description of	NONE		

Mark	
Goods/Services	Class 021. First use: First Use: 1974/03/29 First Use In Commerce: 1974/03/29 SMALL DOMESTIC UTENSILS AND CONTAINERS (NOT OF PRECIOUS METALS, OR COATED THEREWITH); [COMBS AND SPONGES; BRUSHES (OTHER THAN PAINT BRUSHES); INSTRUMENTS AND MATERIAL FOR CLEANING PURPOSES;] GLASSWARE [, PORCELAIN AND EARTHENWARE, NOT INCLUDED IN OTHER CLASSES]

U.S. Registration No.	1128972	Application Date	07/31/1978
Registration Date	01/08/1980	Foreign Priority Date	NONE
Word Mark	JEEP		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 014. First use: First Use: 1974/03/29 First Use In Commerce: 1974/03/29 [PRECIOUS METALS AND THEIR ALLOYS,] JEWELRY, [PRECIOUS STONES,] AND HOROLOGICAL INSTRUMENTS		

U.S. Registration No.	1236540	Application Date	06/23/1982
Registration Date	05/03/1983	Foreign Priority Date	NONE
Word Mark	JEEP		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 028. First use: First Use: 1979/00/00 First Use In Commerce: 1979/00/00 Toys-Namely, Model Replicas of Land Vehicles		

U.S. Registration No.	2635685	Application Date	07/31/1998
Registration Date	10/15/2002	Foreign Priority Date	NONE
Word Mark	JEEP		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 022. First use: First Use: 2002/06/07 First Use In Commerce: 2002/06/07 tents		

U.S. Registration No.	2729404	Application Date	07/31/1998
Registration Date	06/24/2003	Foreign Priority Date	NONE
Word Mark	JEEP		
Design Mark			
Description of Mark	NONE		

Goods/Services	Class 020. First use: First Use: 2002/08/01 First Use In Commerce: 2002/08/01 sleeping bags [and beds all] for use when camping		
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U.S. Registration No.	2461861	Application Date	07/24/2000
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Registration Date	06/19/2001	Foreign Priority Date	NONE
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Word Mark	JEEP		
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Design Mark	JEEP		
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Description of Mark	NONE		
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Goods/Services	Class 009. First use: First Use: 1998/07/07 First Use In Commerce: 1999/07/28 eyeglasses and sunglasses		
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U.S. Registration No.	2586284	Application Date	06/23/2000
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Registration Date	06/25/2002	Foreign Priority Date	NONE
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Word Mark	JEEP		
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Design Mark	JEEP		
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Description of Mark	NONE		
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Goods/Services	Class 012. First use: First Use: 2001/02/28 First Use In Commerce: 2001/02/28 vehicles, namely infant and toddler strollers		
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U.S. Registration No.	2512866	Application Date	01/31/2001
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Registration Date	11/27/2001	Foreign Priority Date	NONE
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Word Mark	JEEP		
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Design Mark	<h1>JEEP</h1>		
Description of Mark	NONE		
Goods/Services	Class 021. First use: First Use: 1998/03/00 First Use In Commerce: 1998/03/00 HOUSEHOLD CONTAINERS, NAMELY, MUGS AND INSULATED CONTAINERS FOR BEVERAGES		

U.S. Registration No.	3121354	Application Date	09/04/2002
Registration Date	07/25/2006	Foreign Priority Date	NONE

Word Mark	JEEP
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Design Mark			
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Description of Mark	NONE		
Goods/Services	Class 012. First use: First Use: 2002/09/00 First Use In Commerce: 2002/09/00 AUTOMOBILES, AND STRUCTURAL PARTS AND ENGINES THEREFOR		

U.S. Registration No.	2681201	Application Date	11/02/2001
Registration Date	01/28/2003	Foreign Priority Date	NONE

Word Mark	JEEP
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Design Mark	
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Description of Mark	NONE		
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Goods/Services	Class 014. First use: First Use: 1995/09/00 First Use In Commerce: 1995/09/00 WATCHES, CLOCKS, AND PARTS THEREFOR		
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U.S. Registration No.	2800213	Application Date	08/15/2001
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Registration Date	12/30/2003	Foreign Priority Date	NONE
Word Mark	JEEP		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 028. First use: First Use: 2001/05/02 First Use In Commerce: 2001/05/02 SPORTING EQUIPMENT, NAMELY, ALL-TERRAINBOARDS		

U.S. Registration No.	2911077	Application Date	12/05/2003
Registration Date	12/14/2004	Foreign Priority Date	NONE
Word Mark	JEEP		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 016. First use: First Use: 2002/12/00 First Use In Commerce: 2002/12/00 PRINTED MATERIALS AND PUBLICATIONS RELATED TO MOTOR VEHICLES, THEIR COMPONENT PARTS AND ENGINES Class 035. First use: First Use: 2002/10/00 First Use In Commerce: 2002/10/00 MOTOR VEHICLE DEALERSHIP SERVICES Class 037. First use: First Use: 2002/09/00 First Use In Commerce: 2002/09/00 MOTOR VEHICLE REPAIR AND MAINTENANCE SERVICES		

U.S. Registration No.	2849309	Application Date	06/13/2002
Registration Date	06/01/2004	Foreign Priority Date	NONE
Word Mark	JEEP		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 025. First use: First Use: 2003/08/25 First Use In Commerce: 2003/08/25 FOOTWEAR, NAMELY, BOOTS		

U.S. Registration No.	4091155	Application Date	08/15/2011
Registration Date	01/24/2012	Foreign Priority Date	NONE

Word Mark	JEEP
Design Mark	
Description of Mark	NONE
Goods/Services	Class 018. First use: First Use: 1993/09/00 First Use In Commerce: 1993/09/00 Backpacks; Luggage

Attachments	76094057#TMSN.gif(bytes) 76075896#TMSN.gif(bytes) 78045802#TMSN.gif(bytes) 78160520#TMSN.gif(bytes) 78336887#TMSN.jpeg(bytes) 85397814#TMSN.jpeg(bytes) NoticeofOppositionJeeponSerialNo86005240.pdf(159251 bytes)
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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	/Kristen I. Spano/
Name	Kristen I. Spano
Date	04/01/2014

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

In the matter of Trademark Application Serial No. 86/005,240
For the mark JEEPON
Published in the Official Gazette on 12/3/13

CHRYSLER GROUP LLC

Opposition No. _____

Opposer,

vs.

JEEN INTERNATIONAL CORPORATION

Applicant.

_____ /

NOTICE OF OPPOSITION

Chrysler Group LLC (“Opposer”), a limited liability company organized and existing under the laws of Delaware, with its principal place of business at 1000 Chrysler Drive, Auburn Hills, Michigan 48326, believes that it will be damaged by the registration of the mark “JEEPON” shown in Serial No. 86/005,240 in International Class 1, and hereby opposes same.

The grounds for opposition are as follows:

1. Opposer is the owner of numerous U.S. Registrations for the JEEP® trademark which are valid, subsisting, unrevoked and incontestable including, but not limited to, U.S. Registration No. 0526175, registered on the Principal Register on June 13, 1950, in Class 12 for “AUTOMOBILES AND STRUCTURAL PARTS THEREOF”; U.S. Registration No. 1081322, registered on the Principal Register on January 3, 1978 in Class 37 for “AUTOMOTIVE VEHICLE REPAIR AND MAINTENANCE SERVICE”; and U.S. Registration No. 1,130,015, registered on the Principal Register on January 29, 1980, in Class 25 for “CLOTHING-NAMELY, TROUSERS,

JACKETS, [BLAZERS,] RAIN WEAR, HEAD WEAR, T-SHIRTS, SWEAT SUITS, WARM-UP SUITS, SWEATERS, COATS, GLOVES, [HOODS,] AND SCARVES” (hereinafter collectively referred to as the “JEEP® Brand Trademarks”).

2. In addition to the goods identified above, Opposer’s JEEP® Brand trademark registrations cover numerous consumer goods including, but not limited to, knives, forks, spoons, combs, sponges, glassware, cleaning instruments, jewelry, toys, watches, clocks, tents, sleeping bags, eyeglasses, sunglasses, strollers, mugs, insulated beverage containers, footwear, backpacks, luggage, stickers, decals, flashlights and blankets. Opposer has also used the JEEP® trademark on numerous other products, including, but not limited to, pens, journals, messenger bags, video games, golf balls, coasters, cell phone covers, go-carts, bicycles and flower arrangements.
3. Opposer has used its JEEP® trademark in connection with “AUTOMOBILES AND STRUCTURAL PARTS THEREOF” in Class 12 continuously for seven decades.
4. Opposer’s goods and services sold under the JEEP® Brand Trademarks have been continuously sold and advertised in the United States for decades. As a result of Opposer’s continuous sale of its goods and services under the JEEP® Brand Trademarks, Opposer has built up valuable goodwill in the JEEP® Brand Trademarks, the JEEP® Brand Trademarks have become a symbol of Opposer and have become an indicator of the source of Opposer’s goods and services, and the JEEP® Brand Trademarks have become famous in the United States.
5. Opposer has also established and owns substantial common law rights in the JEEP® Brand Trademarks.

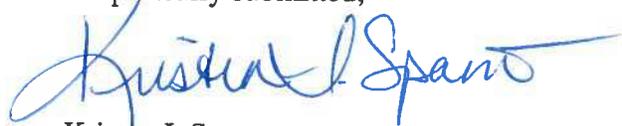
6. Applicant has filed an application for registration of the alleged mark “JEEPON”, U.S. Serial No. 86/005,240, in Class 1 for the following goods: “Chemicals for use in the manufacture of cosmetic, personal care and pharmaceutical products, namely, methyl taurate esters”.
7. Applicant filed its application for registration of the alleged mark “JEEPON” on July 9, 2013, alleging a first use anywhere date and a first use in commerce date of April 19, 1996. All such dates were long after the date on which Opposer began using the JEEP® Brand Trademarks in connection with the sale of its goods and services described above, decades after U.S. Registration No. 0526175 for the mark JEEP® was registered, and long after Opposer’s JEEP® Brand Trademarks became famous.
8. Applicant’s alleged “JEEPON” mark so resembles Opposer’s JEEP® Brand Trademarks as to be likely, when applied to Applicant’s goods, to cause confusion or to cause mistake or to deceive purchasers as to the source of Applicant’s goods, because of Opposer’s prior use and registration of the famous JEEP® Brand Trademarks marks in connection with the sale of the same or similar goods and services as those sold by Applicant under its alleged mark.
9. Opposer will be damaged by the registration of Applicant’s alleged mark in view of the likelihood of confusion such registration will cause as to the source of Opposer’s and Applicant’s respective goods and services.
10. Opposer will also be damaged by the registration of Applicant’s alleged mark because Applicant’s alleged mark will dilute the distinctive quality of Opposer’s famous JEEP® Brand Trademarks.

Opposer hereby appoints Kristen I. Spano, a member of the bar of the State of Michigan, Senior Trademark Counsel, Chrysler Group LLC, CIMS 485-13-32, 1000 Chrysler Drive, Auburn Hills, MI 48326, as its attorney to prosecute this opposition and to transact all business in the United States Patent and Trademark Office in connection therewith.

WHEREFORE, Opposer prays that this opposition be sustained and that Applicant's pending Application Serial No. 86/005,240 be refused registration.

DATED: 4/1/2014

Respectfully submitted,



Kristen I. Spano
Senior Trademark Counsel
Chrysler Group LLC
CIMS 485-13-32
1000 Chrysler Drive
Auburn Hills, MI 48326
(248) 512-6475

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Notice of Opposition has been served on Louis C. Paul by mailing said copy on April 1, 2014 via First Class Mail, postage prepaid to:

Louis C. Paul
Louis C. Paul & Associates, PLLC,
150 E. 58th St. FL 34
New York, NY 10155-3499



Danielle M. McGurk
Trademark Paralegal
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