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

Proceeding	92048850
Party	Defendant FORD MOTOR COMPANY
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Submission	Motion to Suspend for Civil Action
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Signature	/elizabeth f janda/
Date	06/20/2008
Attachments	MoToSusp.pdf ( 3 pages )(68237 bytes ) 1-1 Complaint.pdf ( 15 pages )(74472 bytes ) 1-2 Index of Exhibits.pdf ( 1 page )(23525 bytes ) 1-3 Exhibit A.pdf ( 12 pages )(3079367 bytes ) 1-4 Exhibit B.pdf ( 2 pages )(49989 bytes )

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

ARION PERFUME & BEAUTY, )	
INC. )	
)	
Petitioner, )	
)	
v. )	Cancellation No. <u>92048850</u>
)	Registration No. <u>2770412</u>
FORD MOTOR COMPANY )	
)	
Registrant. )	

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**MOTION TO SUSPEND FOR CIVIL ACTION**

Filed Electronically  
Trademark Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1451  
Alexandria, VA 22313-1451

Sir:

The Registrant, FORD MOTOR COMPANY, files this Motion to Suspend for Civil Action, pursuant to 37 C.F.R. § 2.117 and T.B.M.P. § 510.02. Ford requests this suspension pending the outcome of another proceeding, namely, Ford Motor Company vs. Arion Perfume & Beauty, Inc., Civil Action No. 2:08 CV 12604, filed June 18, 2008, in the Federal District Court for the Eastern District of Michigan. This civil action involves the identical parties and issues in common with those pending before the Board in this Cancellation action. A courtesy copy of the Complaint was sent to counsel for Petitioner on June 18, 2008, via email and overnight courier.

FORD MOTOR COMPANY respectfully requests that this Board suspend the proceeding in this Cancellation action, since the final determination of the pending complaint for

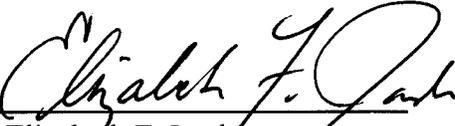
Cancellation No. 92048850

U.S. Registration No. 2,770,412

trademark infringement, unfair competition, dilution, and further contains a request for a declaration of the validity of U.S. Registration No. 2,770,412. A copy of the Complaint as filed is attached per T.B.M.P. § 510.02(a).

Respectfully submitted,

FORD MOTOR COMPANY

By   
Elizabeth F. Janda  
Attorneys/Agents for Registrant

Date: June 20, 2008  
(Filed electronically via USPTO.ESTTA)

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Our File: FMCTA 21423 OC

**CERTIFICATE OF TRANSMITTAL**

I hereby certify that this correspondence is being electronically transmitted in PDF format to the Trademark Trial and Appeal Board through the Electronic System for Trademark Trials and Appeals (ESTTA) on the following date:

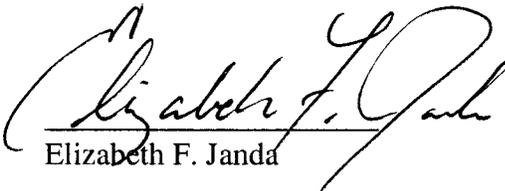
Date: June 20, 2008

  
Elizabeth F. Janda

**CERTIFICATE OF SERVICE**

Thereby certify that this correspondence is being served on counsel for Arion Perfume & Beauty, Inc., Mark A. Kammer, via email at [makammer@kammerbrowning.com](mailto:makammer@kammerbrowning.com) and First Class Mail at Kammer Browning PLLC, 7700 Broadway, Suite 202, San Antonio, Texas 78209 on the following date:

Date: June 20, 2008

  
Elizabeth F. Janda

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**FORD MOTOR COMPANY,**

*Plaintiff,*

vs.

**HONORABLE** \_\_\_\_\_

**CIVIL ACTION NO.** \_\_\_\_\_

**ARION PERFUME & BEAUTY, INC,  
d/b/a DORALL COLLECTION,**

*Defendant.*

---

FRANK A. ANGILERI (P45611)  
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*Attorneys for Plaintiff*

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**COMPLAINT**

Plaintiff, Ford Motor Company, as and for its Complaint, alleges as follows:

**NATURE OF THE ACTION**

This is an action against Arion Perfume & Beauty, Inc. (hereafter “Defendant”) for federal trademark infringement, federal false designation of origin, federal dilution, and related state claims.

**PARTIES**

1. Ford Motor Company (hereinafter “Ford”) is a Delaware corporation having a place of business at One American Road, Dearborn, Michigan 48126.

2. Upon information and belief, Arion Perfume & Beauty, Inc. is a Florida corporation having a place of business at 976 Associate Drive, Suite 100, Schertz, Texas 78514 (hereafter “Defendant”).

3. Upon information and belief, Defendant also does business under the name Dorall Collection.

**JURISDICTION AND VENUE**

4. This action arises under 15 U.S.C. §§1051 *et seq.* and asserts related claims of trademark infringement, false designation of origin, dilution and related state claims as set forth more fully herein.

5. The Court has jurisdiction pursuant to 15 U.S.C. §1121, and 28 U.S.C. §§ 1332, 1338 and 1367.

6. This Court has personal jurisdiction over Defendant because Defendant conducts business in the State of Michigan and in this judicial district.

7. Venue lies in this district.

### **FACTUAL BACKGROUND**

8. Ford is a world famous manufacturer, engaged in the design, development, manufacture, sale and service of motor vehicles and parts and accessories for motor vehicles.

9. In addition to Ford's primary business, Ford owns rights to various trademarks and licenses third party use of these trademark rights in various industries.

10. Ford has used the mark MUSTANG since at least as early as April 17, 1964, in connection with its vehicles and related goods and services, and currently uses and/or licenses the mark MUSTANG for use in connection with a wide variety of goods and services.

11. Ford is the owner of U.S. Trademark Registration No. 1,467,208 for the MUSTANG for "automobiles and their structural parts," in International Class 12. This Registration issued December 1, 1987, and is incontestable, valid and subsisting, uncancelled and unrevoked.

12. Ford is the owner of U.S. Trademark Registration No. 1,995,783 for the mark MUSTANG for "auto parts and accessories, namely license plate frames, sunshades, sun screens, exterior insignia badges, fitted and semi fitted covers for vehicles, vehicle seat covers, fender covers," in Class 12. This Registration issued August 20, 1996, and is incontestable, valid and subsisting, uncancelled and unrevoked.

13. Ford is the owner of U.S. Trademark Registration No. 2,770,412 for the mark MUSTANG in International Class 3 for use in connection with fragrances, namely cologne, perfume, toilet water and aftershave lotion. This Registration issued September 30, 2003, and is valid and subsisting, uncanceled and unrevoked.

14. Ford has licensed third party use of the MUSTANG trademark in connection with fragrances since at least as early as 1976 as represented by the licensed samples. (See Exhibit A.)

15. Ford owns several additional United States Patent and Trademark Office trademark registrations for the MUSTANG trademark for use with a variety of goods and services, including U.S. Trademark Registration Nos. 1,922,186; 1,858,362; 1,914,604; 1,910,094; 1,917,997; 1,918,103; 1,858,696; 1,975,210; 1,997,313; 1,998,459; 1,995,791; 1,995,793; 2,111,765; 2,109,925; 2,032,384; 2,061,634; and 2,059,524.

16. In addition, Ford owned U.S. Registration No. 2,041,086 for the MUSTANG BOTTLE CONFIGURATION design mark, which issued February 6, 1997, and was in force until 2007.

17. Ford has expended considerable effort and expense in promoting its MUSTANG mark and the goods associated with the mark, with the result that the purchasing public has come to know and recognize the products of Ford by the mark. Ford has an exceedingly valuable goodwill established in its MUSTANG mark.

18. By virtue of Ford's long use and extensive sales of goods under the MUSTANG mark throughout the United States, the success of Ford's advertising and

promotional efforts, and Ford's ownership of numerous federal trademark registrations on the Principal Register, Ford's MUSTANG mark has become famous.

19. Long prior to the acts of Defendant complained of herein, Ford's MUSTANG brand and trademark had become famous in connection with motor vehicles. The MUSTANG brand and trademark also has earned significant customer goodwill in connection with fragrance products.

20. From a time period spanning the years 1976 through 1978, Ford licensed Avon Products, Inc. to use the MUSTANG trademark and product configuration of a 1964 FORD MUSTANG to make and sell fragrance products in a bottle configured as the 1964 MUSTANG vehicle with the MUSTANG trademark displayed on the product packaging.

21. From a time period spanning the years 1994 through 1996, Ford licensed Avon Products, Inc. to use the MUSTANG trademark and product configuration of a 1964 FORD MUSTANG to make and sell fragrance products in a bottle configured as the 1964 MUSTANG vehicle with the MUSTANG trademark displayed on the product packaging.

22. From a time period spanning the years 1999 through 2000, Ford licensed Avon Products, Inc. to use the MUSTANG trademark and product configuration of a 1964 FORD MUSTANG, among other trademarks, to make and sell fragrance products in a bottle configured as the 1964 MUSTANG vehicle with the MUSTANG trademark displayed on the product packaging.

23. From a time period spanning the years 2000 to 2003, Ford licensed Avon Products, Inc. to use the MUSTANG trademark and product configuration of a 1964 FORD MUSTANG, among other trademarks, to make and sell fragrance products in a bottle configured

as the 1964 MUSTANG vehicle with the MUSTANG trademark displayed on the product packaging.

24. From a time period spanning the years 2004 through 2006, Ford licensed Aramis, Inc. to use the MUSTANG trademark in connection with wrapping and packaging for fragrance products.

25. From a time period spanning the years 2006 through the present day, Ford has licensed Aramis, Inc. to use the MUSTANG trademark in connection with fragrance products.

**Defendant's Actions And Sale of MUSTANG Branded Fragrance Products**

26. Without the consent of Ford, Defendant sells fragrance products under the MUSTANG trademark in the United States, including, but not limited to fragrances bearing the marks MUSTANG and MUSTANG PACE. Photographs of Defendant's goods are attached hereto as Exhibit B.

27. On information and belief, Ford's use of MUSTANG in connection with its goods was well known, and well known to Defendant prior to Defendant's adoption and use of MUSTANG in connection with its goods.

28. Defendant's fragrance bearing the MUSTANG mark has been characterized as a "IMPOSTER" fragrance, and is compared to or referenced as being similar to Ralph Lauren Polo ® fragrances.

29. On February 8, 2008, Defendant filed a Petition to Cancel Ford's U.S. Trademark Registration No. 2,770,412, challenging the validity of Ford's registration, falsely

alleging that Ford abandoned its rights in MUSTANG for fragrances, and claiming senior common law rights to the "MUSTANG" mark in connection with fragrances, based on Defendant's claim of use as of February, 2002.

30. Ford has never abandoned its established rights in MUSTANG, nor its rights in MUSTANG in connection with fragrances, and currently uses/licenses the mark in connection with such goods

31. At the time Defendant claims it commenced use of MUSTANG, Ford had been licensing the use of MUSTANG for fragrances for many years, and had a current licensee.

32. At the time Defendant claims it adopted the MUSTANG mark on its fragrances, Ford owned U.S. Registration No. 2,041,086 for the MUSTANG BOTTLE CONFIGURATION Design Mark, and was actively pursuing registration of the MUSTANG mark for Class 3 goods. While the Trademark Office Records currently show that Application S.N. 75/781,113 lapsed on December 14, 2000, the Trademark Office did not rule on Ford's Petition to Revive until July 25, 2002, and Ford promptly refiled its application.

33. Ford's current registration No. 2,770,412 was filed on August 5, 2002, and was published on February 25, 2003. Defendant never filed a notice of Opposition at that time nor raised any issue with Ford prior to the Petition for Cancellation.

34. In the face of Ford's clear prior use and registration, Defendant's sale of fragrance products under the MUSTANG trademark creates a likelihood of confusion in the marketplace as to an association or affiliation between Ford and Defendant, and a likelihood of confusion as to the source or origin of the goods bearing the MUSTANG mark.

35. Upon information and belief, Defendant intended to trade off the goodwill in Ford's MUSTANG mark, and intended to create an association with the famous mark, to the detriment of Ford.

36. By Defendant's acts, Defendant is harming the reputation of Ford's famous mark.

37. Defendant's unauthorized sale of fragrances under the MUSTANG trademark causes dilution by blurring and dilution by tarnishment of Ford's rights in the MUSTANG trademark.

38. Defendant's Petition to Cancel Ford's legitimate registration is not well founded and causes significant damage to Ford and its trademark, and should be dismissed.

39. Defendant's continued unauthorized use of the MUSTANG trademark causes likelihood of consumer confusion, mistake or deception, constitutes trademark infringement and unfair competition, and constitutes dilution by blurring and dilution by tarnishment of Ford's MUSTANG trademark.

**FIRST CLAIM FOR RELIEF**  
**FEDERAL TRADEMARK INFRINGEMENT**  
**VIOLATION OF 15 U.S.C. §1114**

40. Plaintiff incorporates the allegations of paragraphs 1 - 39 above, as if fully stated herein.

41. Defendant's acts complained of herein are likely to cause confusion or to cause mistake or to deceive in violation of 15 U.S.C. §1114.

42. Upon information and belief Defendant's continued use of Plaintiff's registered mark in connection with its goods has caused and continues to cause a likelihood of confusion and actual confusion in the marketplace as to the source or origin of Defendant's goods.

43. Upon information and belief, Defendant's acts of trademark infringement and unfair competition have been committed with the intent to cause confusion, mistake, or to deceive.

44. As a direct and proximate result of Defendant's conduct, Ford has suffered irreparable harm to its valuable trademark. Unless Defendant is restrained from further infringement of Ford's MUSTANG trademark, Ford will continue to incur immediate and irreparable damage to its goodwill, its business reputation, and to the affiliation of its registered trademark with its authorized products and services.

45. Ford has no adequate remedy at law that will fully compensate for the continued and irreparable harm it will suffer if Defendant's acts are allowed to continue.

**SECOND CLAIM FOR RELIEF**  
**FALSE DESIGNATION OF ORIGIN**  
**VIOLATION OF 15 U.S.C. §1125(a)**

46. Plaintiff incorporates the allegations of paragraphs 1 - 45 above, as if fully stated herein.

47. Defendant's acts complained of herein constitute false designation of origin, and are likely to cause confusion or to cause mistake or to deceive in violation of 15 U.S.C. §1125(a).

48. Plaintiff's goods are offered and advertised to the same or similar classes of purchasers as Defendant's infringing goods. As a result of Defendant's conduct, there is a strong likelihood of confusion, mistake or deception, and persons familiar with Ford's MUSTANG mark, its reputation and favorable goodwill, are likely to purchase Defendant's infringing goods with the mistaken belief that such infringing goods are offered or authorized by Ford.

49. Ford has no adequate remedy at law that will fully compensate for the continued and irreparable harm it will suffer if Defendant's acts are allowed to continue.

**THIRD CLAIM FOR RELIEF**  
**DILUTION**  
**VIOLATION OF 15 U.S.C. §1125(c)**

50. Plaintiff incorporates the allegations of paragraphs 1 - 49 above, as if fully stated herein.

51. Defendant's acts complained of herein are likely to cause dilution by blurring and/or dilution by tarnishment of Ford's famous MUSTANG trademark, in violation of 15 U.S.C. §1125(c).

52. Ford has no adequate remedy at law that will fully compensate for the continued and irreparable harm it will suffer if Defendant's acts are allowed to continue.

**FOURTH CLAIM FOR RELIEF**  
**DECLARATION OF VALIDITY OF U.S. REGISTRATION NO. 2,770,412**  
**AND DISMISSAL OF PETITION FOR CANCELLATION**  
**PURSUANT TO 15 U.S.C. § 1119**

53. Plaintiff incorporates the allegations of paragraphs 1 - 52 above, as if fully stated herein.

54. Defendant's Petition for Cancellation Action No. 92048850 is not well-founded or supportable by the facts. Plaintiff has not abandoned its rights to MUSTANG for fragrances.

55. Ford's registration is not defective, since Ford filed proper specimens showing use of the MUSTANG mark on goods or packaging for the designated goods as is proper under 15 U.S.C. § 1127.

56. Ford is entitled to seek and asks this Court to order the Under Secretary of Commerce for Intellectual Property and Director of the United States Patent and Trademark Office, to declare the validity of Ford's Registration No. 2,770,412 and enter judgment in favor of Ford on the Petition for Cancellation Action No. 920488850, pursuant to 15 U.S.C. § 1119.

57. Ford has no adequate remedy at law that will fully compensate for the continued and irreparable harm it will suffer if Defendant's acts are allowed to continue.

**FIFTH CLAIM FOR RELIEF**  
**STATE UNFAIR PRACTICES**  
**VIOLATION OF MICH. COMP. LAW. ANN. §§ 445.901 *et seq.***

58. Plaintiff incorporates the allegations of paragraphs 1 - 57 above, as if fully stated herein.

59. Defendant's acts constitute unfair, unconscionable, and deceptive methods, acts or practices in the conduct of trade or commerce in violation of the Michigan Consumer Protection Act, Mich. Comp. Law. Ann. §§ 445.901 *et seq.*

60. Ford has no adequate remedy at law that will fully compensate for the continued and irreparable harm it will suffer if Defendant's acts are allowed to continue.

**SIXTH CLAIM FOR RELIEF**  
**STATE LIKELIHOOD OF CONFUSION**  
**VIOLATION OF MICH. COMP. LAW. ANN § 429.42(a) AND COMMON LAW**

61. Plaintiff incorporates the allegations of paragraphs 1 - 60 above, as if fully stated herein

62. Defendant's acts are likely to cause confusion, or to cause mistake or to deceive in violation of Mich. Comp. Law. Ann § 429.42(a) and Michigan Common Law.

63. Ford has no adequate remedy at law that will fully compensate for the continued and irreparable harm it will suffer if Defendant's acts are allowed to continue.

**SEVENTH CLAIM FOR RELIEF**  
**STATE TRADEMARK INFRINGEMENT,**  
**UNFAIR COMPETITION AND DILUTION**  
**VIOLATION OF COMMON LAW**

64. Plaintiff incorporates the allegations of paragraphs 1 - 63 above, as if fully stated herein.

65. Defendant's acts constitute trademark infringement, unfair competition and dilution under Michigan common law.

66. Ford has no adequate remedy at law that will fully compensate for the continued and irreparable harm it will suffer if Defendant's acts are allowed to continue.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff Ford Motor Company prays that this Court enter Judgment against Defendant, as follows:

A. That Defendant has willfully and deliberately violated 15 U.S.C. § 1114, that Ford has been damaged by such violation, and that Defendant is liable to Ford for such violations.

B. That Defendant has violated 15 U.S.C. § 1125(a) by falsely designating the origin of Defendant's infringing goods, falsely describing such infringing goods, and unfairly competing with Ford, that Ford has been damaged by such violation, and that Defendant is liable to Ford for such violation.

C. That Defendant's use of MUSTANG is likely to cause and does cause dilution by blurring and dilution by tarnishment in violation of 15 U.S.C. § 1125(c).

D. That Ford has not abandoned its rights in the MUSTANG mark, and that its U.S. Registration No. 2,770,412 is valid and enforceable.

E. That this Court exercise its power under 15 U.S.C. § 1119 to order the Under Secretary of Commerce for Intellectual Property and Director of Patents and Trademarks to enter judgment in favor of Ford on the validity of its U.S. Registration No. 2,770,412 and to dismiss the Cancellation Action No. 92048850.

F. That Defendant and its agents, officers, directors, servants, employees, attorneys, its successors and assigns, and all others in active concert or participation with Defendant, and each of them who receives notice directly or otherwise from it, be preliminarily and permanently enjoined from directly or indirectly:

1. Using the mark MUSTANG;
2. Diluting the distinctive quality of the MUSTANG trademark or otherwise injuring or interfering with Ford's business, business reputation or goodwill by dilution by blurring or dilution by tarnishment; and
3. Engaging in unfair practices and acts that are likely to cause confusion or to cause mistake or to deceive.

G. That Defendant account for, and pay to Ford, all of Defendant's profits, gains and advantages that are realized from Defendant's illegal conduct, pursuant to 15 U.S.C. §1117 and Michigan law;

H. That Ford be awarded all damages sustained by it which are attributable to Defendant's infringement of the MUSTANG trademark, and for the torts committed against Ford, and that said damages be trebled pursuant to 15 U.S.C. § 1117 and Michigan law;

I. That Ford be awarded its costs of suit, expenses and reasonable attorney's fees pursuant to 15 U.S.C. §1117 and Michigan law; and

J. That Ford have such other and further relief as the Court deems equitable and just in the circumstances.

**JURY DEMAND**

Plaintiff hereby demands a trial by jury on all issues so triable.

Respectfully submitted,

**BROOKS KUSHMAN P.C.**

By: /s/ Frank A. Angileri

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*Attorneys for Plaintiffs*

Dated: June 18, 2008

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

FORD MOTOR COMPANY,

*Plaintiff,*

vs.

ARION PERFUME & BEAUTY, INC.  
d/b/a DORALL COLLECTION,

*Defendant.*

HONORABLE \_\_\_\_\_

CIVIL ACTION NO. \_\_\_\_\_

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**INDEX OF EXHIBITS TO COMPLAINT**

**Exhibit**

Mustang Fragrances . . . . . A

Dorall Products . . . . . B



**Exhibit A**

### '64 MUSTANG

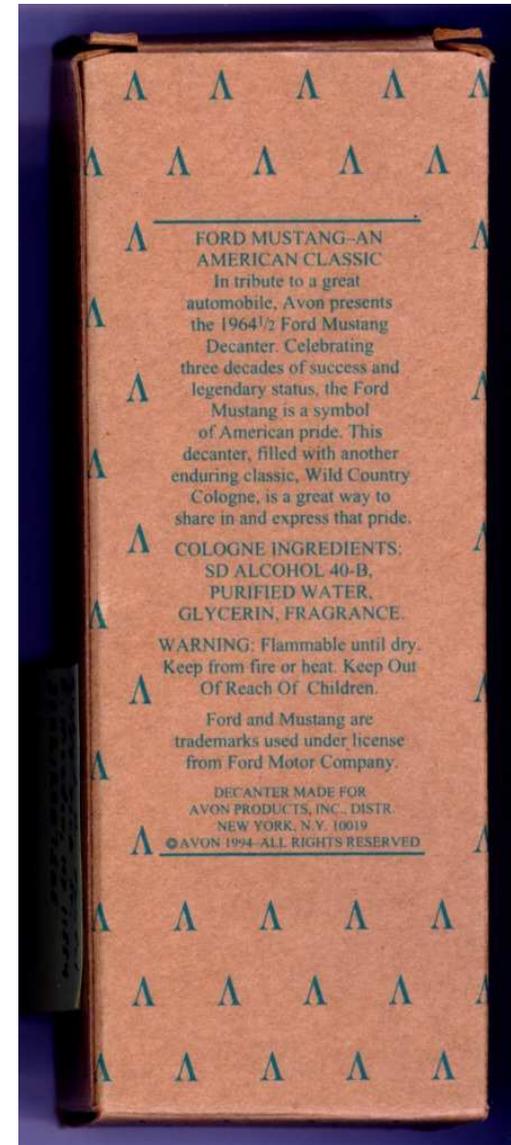
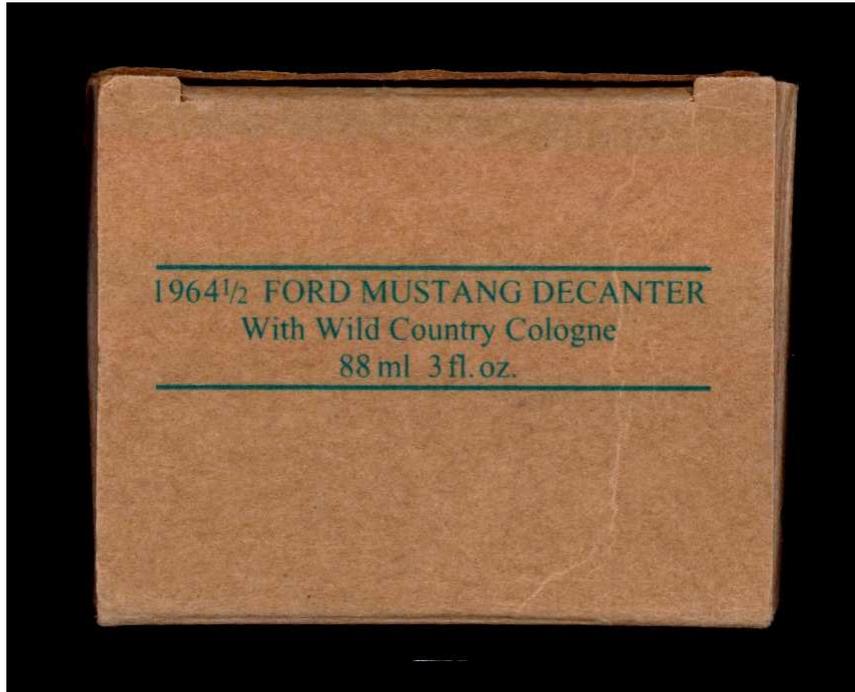
Only 4 months after its premiere at the New York World's Fair in April, 1964, the Ford Mustang became one of the country's best-selling cars. Within a year, its sales topped industry records. What gave the Mustang its extraordinary appeal in so short a time was a combination of distinctive, sporty styling, a wide choice of options, and a price many could afford.

The basic model had room for 4, with bucket seats; a 4-speed transmission; and a smooth-running, 6-cylinder engine. The array of options offered—such as automatic transmission, white sidewall tires, 8-cylinder engine, convertible top—made it possible for a wide range of buyers to custom-tailor this standard version to their budget and taste. Inspired by the history-making '64- Mustang, Avon created this handsome miniature decanter.



AVON  
Gift  
COLLECTION

FORD MUSTANG—AN AMERICAN CLASSIC  
In tribute to a great automobile, Avon presents the 1964½ Ford Mustang Decanter. Celebrating three decades of success and legendary status, the Ford Mustang is a symbol of American pride. This decanter, filled with another enduring classic, Wild Country Cologne, is a great way to share in and express that pride.  
COLOGNE INGREDIENTS: SD ALCOHOL, 40-FL. PURIFIED WATER, GLYCERIN, FRAGRANCE.  
WARNING: Flammable until dry. Keep from fire or heat. Keep Out Of Reach Of Children.  
Ford and Mustang are trademarks used under license from Ford Motor Company.  
DECANTER MADE FOR AVON PRODUCTS, INC., DANBURY, NEW YORK, N.Y. 12834  
© AVON 1998. ALL RIGHTS RESERVED.



*Ford Mustang*  
*An American Classic*

Three decades ago, Ford Motor Company introduced the Mustang automobile at the New York World's Fair. Advance anticipation had already created "Mustang Fever" and on the day of unveiling, April 17, 1964, 22,000 orders were taken. In the next twelve months, 417,000 were sold—the launch was an outstanding success story.

The Mustang captured the spirit of its wild and free namesake, a horse that is a classic symbol of power, grace and speed. Since its introduction, the Mustang has become legendary as one of the most popular automobiles of all time, and the original issues are

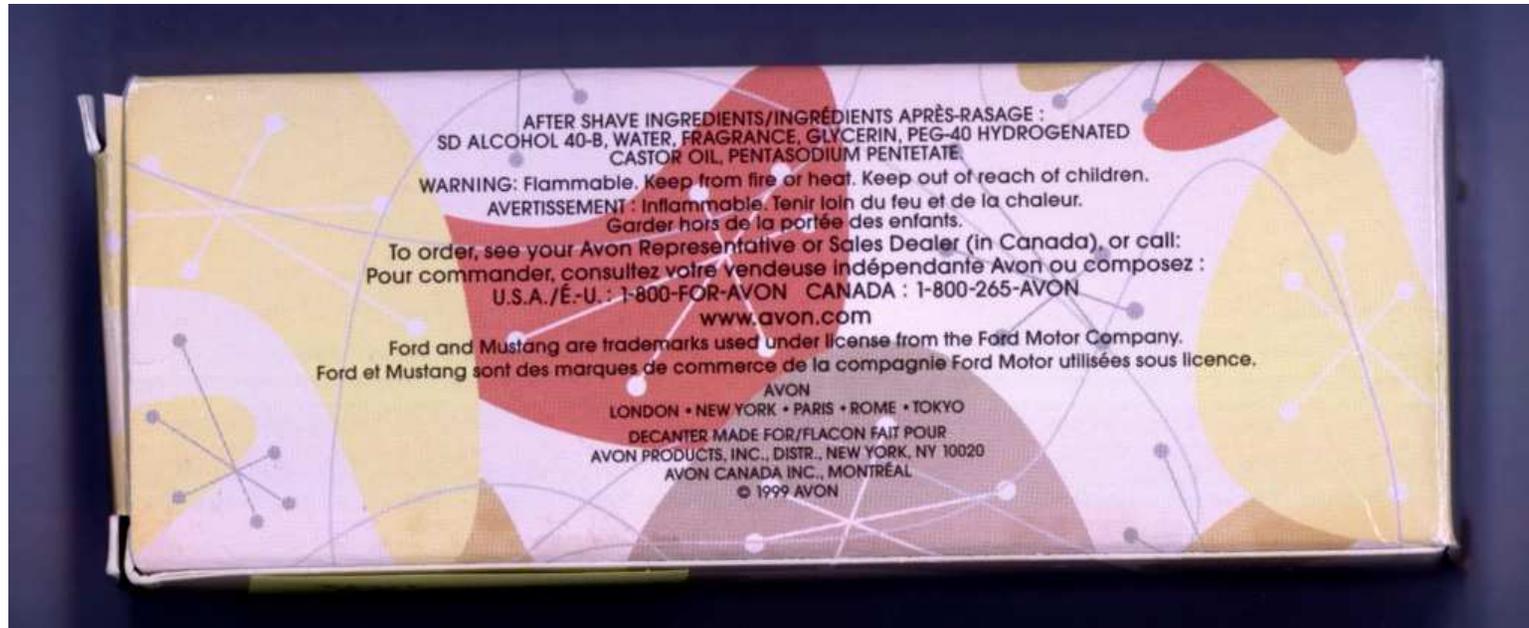
now prized collector's items. Due to its distinctive beauty, the 1964½ Mustang was honored with the Tiffany Award of Excellence in American Design. The legacy of quality and performance has continued through the years, and the 1994 model Mustang has been named "Car of the Year" by Motor Trend.

Avon is proud to offer this decanter as part of the Mustang 30th Anniversary celebration. It is a handsome and distinctive tribute to the heritage of a great American automobile.

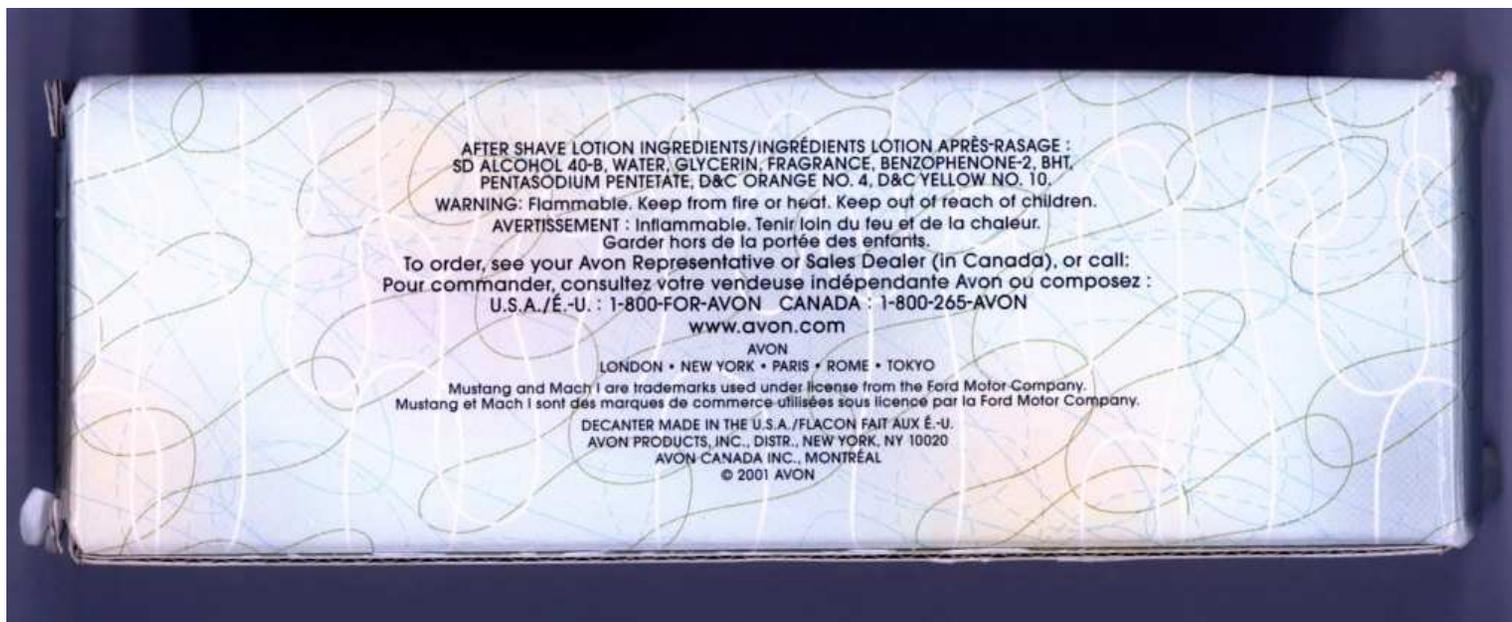
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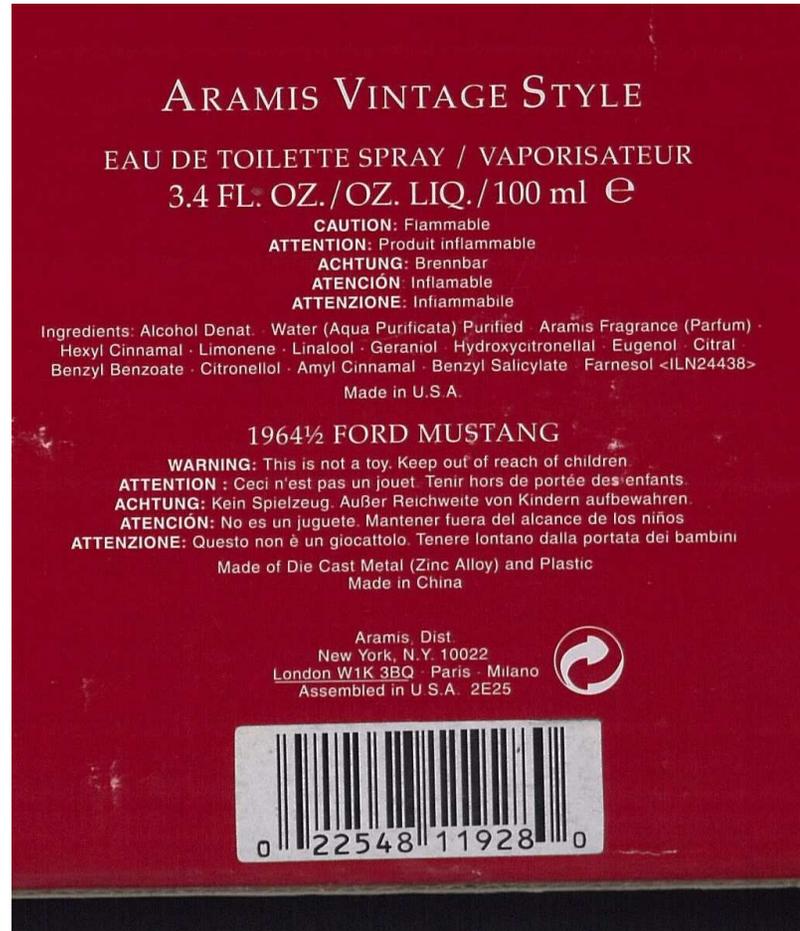
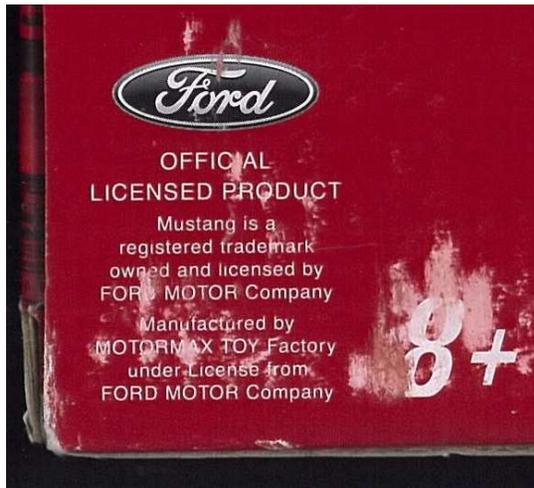


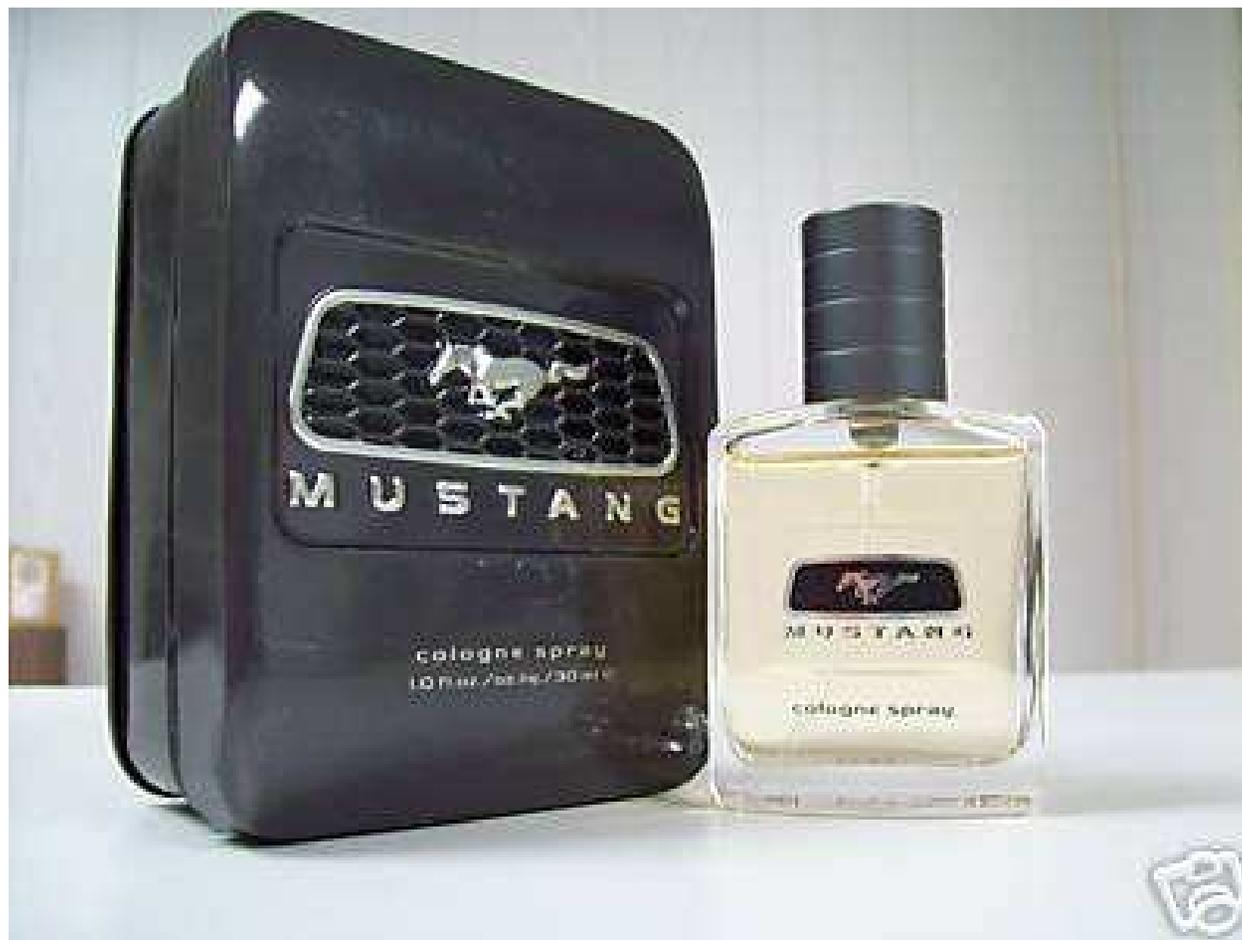














**Exhibit B**

# MUSTANG PACE



**Exhibit B**