

ESTTA Tracking number: **ESTTA383786**

Filing date: **12/15/2010**

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	Fendi Adele S.R.L.		
Entity	Corporation	Citizenship	Italy
Address	Via Flaminia, 968 Rome, ITALY		

Domestic Representative	Larry H Tronco Holland & Hart, LLP One Boulder Plaza, 1800 Broadway Suite 300 Boulder, CO 80302 UNITED STATES docket@hollandhart.com, LHTronco@hollandhart.com Phone:303-473-2783		
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Applicant Information

Application No	85086424	Publication date	11/16/2010
Opposition Filing Date	12/15/2010	Opposition Period Ends	12/16/2010
Applicant	Bell, Anderson 512 North McClurg Court, #3909 Chicago, IL 60611 UNITED STATES		

Goods/Services Affected by Opposition


Class 035. First Use: 2010/07/16 First Use In Commerce: 2010/07/16 All goods and services in the class are opposed, namely: Advertising and sponsorship, namely, promoting the goods and services of others through event, product, and ticket marketing; advertising and sponsorship, namely, promoting the goods and services of others through marketing concerts, parties, food and beverage events, museum events, fashion shows, tournaments, fundraisers, sporting events, night clubs, and night club events

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.	3472633	Application Date	03/05/2007
Registration Date	07/22/2008	Foreign Priority Date	NONE
Word Mark	F F		

Design Mark	
Description of Mark	NONE
Goods/Services	Class 020. First use: Furniture, mirrors, frames; table tops, coat hangers and jewelry boxes made of wood, cork, reed, cane, wicker, horn, bone, ivory, whalebone, shell, amber, mother of pearl, meerschaum, plastic; packaging containers made of plastic

U.S. Registration No.	3554472	Application Date	02/21/2008
Registration Date	12/30/2008	Foreign Priority Date	01/31/2008

Word Mark	F SELLERIA FENDI
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Design Mark	
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Description of Mark	The mark consists of a design of a horse, the letters "F," and the wording, "SELLERIA FENDI". The letter "F's" are featured above the design of the horse with one letter "F" featured upside down and adjacent to the other letter "F". The wording, "SELLERIA FENDI" is featured below the design of the horse.
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Goods/Services	Class 014. First use: Precious metals and their alloys; goods, namely, key rings, rings, earrings, cuff links, bracelets and charms of precious metals, brooches, necklaces, ankle chains, tie pins, pins of jewelry, medallions in precious metals or coated therewith; jewellery, precious stones; horological and chronometric instruments
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U.S. Registration No.	3476908	Application Date	05/22/2007
Registration Date	07/29/2008	Foreign Priority Date	03/05/2007

Word Mark	FENDI
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Design Mark	
Description of Mark	NONE
Goods/Services	<p>Class 020. First use: Furniture, namely, sofas, beds, convertible sofa-beds, chairs, seats, arm-chairs, tables, desks, wardrobes, upholstered poufs, backless couches, furniture screens; goods, namely, picture frames, coat hangers and mirrors made of wood, cork, reed, cane, wicker, horn, bone, ivory, whalebone, shell, amber, mother-of-pearl, meerschaum and substitutes for all these materials</p> <p>Class 024. First use: Textile fabrics for the manufacture of clothing, bedspreads, and textile tablecloths; fabric for textile use; pocket handkerchiefs, handkerchiefs; textile wall hangings; home linens, namely, towels, sheets, pillowcases, quilts, bedspreads, bed blankets for decoration made of cashmere, wool, silk, cotton or polyester, textile table cloths, textile napkins, textile place mats, fabric and plastic curtains</p>

U.S. Registration No.	1214472	Application Date	06/29/1972
Registration Date	10/26/1982	Foreign Priority Date	NONE

Word Mark	FF
Design Mark	

Description of Mark	NONE
Goods/Services	<p>Class U001 (International Class 001, 003, 004, 017, 018, 019, 022, 031). First use: Leather and Imitations of Leather</p> <p>Class U003 (International Class 018). First use: Luggage, Trunks and Travelling Bags</p> <p>Class U041 (International Class 018, 022). First use: Umbrellas and Parasols</p>

U.S. Registration No.	1267539	Application Date	10/29/1976
Registration Date	02/21/1984	Foreign Priority Date	NONE
Word Mark	FF		

Design Mark	
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Description of Mark	NONE
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Goods/Services	<p>Class 003. First use: Perfumes, Toilet Water, Face Soap, Bath Soap, Skin Cleansing and Moisturizing Creams and Lotions, Hair Creams and Lotions, Lipstick, Eye Shadow, Mascara, Rouge, Face Powder, Talcum Powder</p> <p>Class 024. First use: Bed Sheets, Pillow Covers, Bed Covers, Table Cloths, Cloth Napkins, Towels, Fabric Linings Used for Articles of Clothing-Namely, Cloth Coats, Jackets, Hats, Gloves, Shoes, Fur Coats; Handkerchiefs</p> <p>Class 025. First use: Fur Coats, Fur Stoles, Fur Pieces, Rainwear, Cloth Coats, Jackets, Skirts, Trousers, Dresses, Hosiery, Shirts, Blouses, Headwear, Scarves, Foulards, Gloves, Ties, Neckwear, Socks, Stockings, Belts, Swimwear, Lingerie, Shoes, Boots and Slippers</p> <p>Class 026. First use: Belt Buckles, Handbag Clasps, and Zipper Tags and Buttons Used on Items of Clothing</p>
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U.S. Registration No.	1583578	Application Date	12/16/1988
Registration Date	02/20/1990	Foreign Priority Date	NONE


Word Mark	FF
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Design Mark	
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Description of Mark	NONE
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Goods/Services	Class 014. First use: WATCHES, AND PARTS THEREOF
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U.S. Registration	3543724	Application Date	11/24/2006
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No.			
Registration Date	12/09/2008	Foreign Priority Date	05/25/2006
Word Mark	FF		
Design Mark			
Description of Mark	<p>The mark consists of a repeating design comprised of two letters "F", the second of which is inverted and faces the first. The pattern appears over substantially the entire surface of the goods or their packaging. The color black appears in the repetitive "FF" portion of the mark, and chestnut brown appears in the background.</p>		
Goods/Services	<p>Class 003. First use: Soaps, namely, bath soaps in liquid, solid and gel form; perfumery, essential oils, cosmetics; hair lotions; dentifrices</p> <p>Class 009. First use: Computer controlled laser cutting apparatus for cutting optical lenses for eyeglasses; protective helmets for sports, goggles for sports, spectacles, eyeglasses, sunglasses, cases for eyeglasses, eyeglass frames, eyeglass lenses, eyeglass cords and chains, structural parts and fittings for eyeglasses; cases for mobile phones and mp3 players, disc holders</p> <p>Class 014. First use: Watches, clocks, cases, parts and fittings for watches; horological and chronometric instruments, chronometers; key rings of precious metals, rings, earrings, cuff links, bracelets, charms of precious metals, brooches, necklaces, ankle chains, tie pins, pins of jewelry, medallions, jewelry, precious stones, precious metals and precious metal alloys, pearls; gold pens; candlesticks of precious metals; buckles of precious metals; jewelry of precious metals; cigarette and cigar cases of precious metals, ashtrays; jewelry boxes; money clips; stopwatches, wristwatches, pocket watches, watch cases, travel clocks</p> <p>Class 018. First use: Leather and imitation leather, furs; umbrellas, parasols, walking sticks, whips, harness, saddlery; animal skins, animal hides; traveling bags, handbags, shoulder bags, briefcases, attaché cases, trunks; leatherwear, namely, key cases, purses, wallets, shopping bags, suitcases, backpacks, rucksacks; vanity cases sold empty, business card cases made of leather; sport bags, waist bags, beach bags, bags for campers; boxes made of leather; school bags, pouches; leather straps, luggage trolleys made of leather, namely, non-motorized luggage carts</p> <p>Class 025. First use: Clothing, namely, shirts, t-shirts, undershirts, sweatshirts, sport shirts, pants, sport pants, trousers, jeans, shorts, skirts, dresses, underpants, undergarments, corsets, lingerie, belts, sweaters, cardigans, pullovers, business suits, suits, waistcoats, smoking jackets, tuxedos, tailcoats, coats, jackets, fur coats, shawls, scarves, foulards, neckties, bowties, gloves, stockings, tights, socks, footwear, shoes, sport shoes, boots, slippers, sneakers, sandals, swimsuits, pyjamas,</p>		

	headwear, headbands, kerchiefs, caps, hats, visors, ear muffs; waterproof clothing, namely, waterproof jackets, waterproof shirts, waterproof pants, waterproof headwear
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U.S. Registration No.	1377804	Application Date	05/13/1985
Registration Date	01/14/1986	Foreign Priority Date	NONE
Word Mark	FF FENDI		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 003. First use:</p> <p>FACE SOAPS, DEODORANT, [DEODORANT SOAPS, ESSENTIAL OILS USED FOR BEAUTY AND COSMETIC PURPOSES, BATH SALTS,] BATH LOTIONS AND GELS, [BEAUTY MASKS, BEAUTY MILK BATHS, [COTTONS] * COTTON * BALLS FOR COSMETIC PURPOSES, TOOTHPASTES, EYE SHADOW, FOUNDATION CREAM,] EAU-DE-COLOGNE, [EYE MAKE-UP, EYEBROW PENCILS, HAIR DYES, HAIR LOTIONS, PERMANENT WAVE PREPARATIONS, LIPSTICKS, COSMETIC LOTIONS, MAKE-UP, FACE POWDER, DETERGENT TO REMOVE MAKE-UP, MOUTHWASH, NAIL VARNISH,] PERFUMES, [SACHETS, HAIR DRESSINGS,] HAIR SHAMPOO, SHAVING CREAM [AND TALCUM POWDER]</p>		

U.S. Registration No.	1433773	Application Date	12/24/1985
Registration Date	03/24/1987	Foreign Priority Date	10/29/1985
Word Mark	FF FENDI		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 014. First use:</p> <p>((ALARM CLOCKS AND)) [WATCHES NOT MADE WHOLLY OR IN PART OF PRECIOUS METALS;] COSTUME JEWELRY, NAMELY, [EARRINGS, CUFFLINKS, AND ORNAMENTAL PINS,] BRACELETS, ((BROOCHES, CHAINS; CIGARETTE CASES, CIGAR BOXES, AND ASHTRAYS OF PRECIOUS METALS;)) NECKLACES ((, RINGS, TRINKETS))</p> <p>Class 016. First use:</p> <p>[((ALBUMS, CALENDARS, NOTE CARDS AND GREETING CARDS,)) DIARIES, FOUNTAIN PENS, ((INK, NOTEBOOKS, PAPER KNIVES, PAPER</p>		


	<p>WEIGHT,)) PENCILS, PENS ((, PLAYING CARDS, WRITING PADS))]</p> <p>Class 026. First use: LACE AND EMBROIDERY, RIBBONS AND BRAIDS, BUTTONS, PRESS BUTTONS, HOOKS AND EYES, PINS AND NEEDLES, ARTIFICIAL FLOWERS</p> <p>Class 034. First use: [((ASHTRAYS,)) CIGAR AND CIGARETTE CASES, LIGHTERS ((, CIGAR CUTTERS, MATCHBOXES, MATCHES, SMOKER'S SETS INCLUDING CIGAR CUTTERS, CIGARETTE HOLDERS, TOBACCO POUCHES AND JARS, NOT MADE WHOLLY OR IN PART OF PRECIOUS METAL))]</p>
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U.S. Registration No.	1439955	Application Date	12/24/1985
Registration Date	05/19/1987	Foreign Priority Date	08/02/1985
Word Mark	FF FENDI		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 018. First use: ATTACHE-CASES, [BACKPACKS,] TOTE BAGS, BRIEFCASES, KEY CASES, CREDIT CARD CASES, GARMENT BAG FOR TRAVEL, HANDBAGS, SHOULDER BAGS, LUGGAGE, PASSPORT CASES, BRIEFCASE TYPE PORTFOLIOS, SUITCASES [, TRUNKS FOR TRAVELLING] [AND UMBRELLAS]</p> <p>Class 024. First use: [BATH LINEN, BED CLOTHES AND LINEN, BEDSPREADS, HANDKERCHIEFS, HOUSEHOLD LINEN, PILLOWCASES, QUILTS, TABLE NAPKINS AND CLOTHS , SILK, WOOLEN, VELVET AND COTTON FABRICS USED IN THE MANUFACTURE OF CLOTHING]</p> <p>Class 025. First use: [BATHING SUITS,] [BATHROBES,] [BEACHWEAR,] BELTS, [BLAZERS, BLOUSES, BLOUSONS,] SHOES, BOOTS [AND SLIPPERS,] [CARDIGANS, COATS,] FUR COATS, [OVERCOATS, DRESSES, GLOVES,] [GOWNS, HATS AND HEADWEAR,] [JACKETS,] JEANS, [JUMPERS,] [RAIN COATS, SCARVES, SHAWLS, SHIRTS, SKIRTS,] [SLEEPWEAR,] [STOCKINGS, SUITS, T-SHIRTS, TIES,] TROUSERS [, VESTS]</p>		

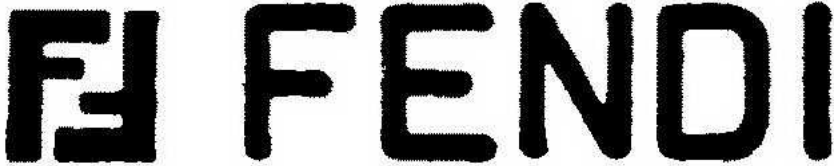
U.S. Registration No.	1476586	Application Date	08/06/1986
Registration Date	02/16/1988	Foreign Priority Date	NONE
Word Mark	FF FENDI		

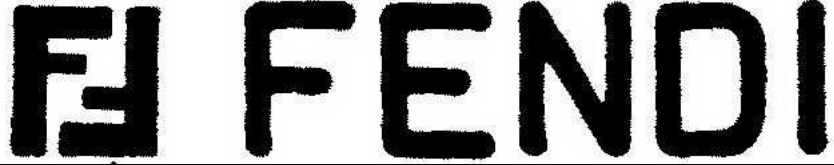
Design Mark			
Description of Mark	THE MARK INCLUDES THE WORD, "FENDI" PRECEDED BY TWO LETTERS "F", THE SECOND OF WHICH IS UPSIDE DOWN AND FACES THE FIRST.		
Goods/Services	Class 009. First use: SPECTACLES, SPECTACLE FRAMES AND SPECTACLE CASES		

U.S. Registration No.	1845311	Application Date	06/25/1993
Registration Date	07/19/1994	Foreign Priority Date	NONE
Word Mark	FF FENDI		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 003. First use: [eye shadow, foundation cream, eye make-up, eyebrow pencils, lipsticks, cosmetic skin, face and] body lotions, [make-up, face powder, nail varnish, detergent to remove make-up; blusher, eye make-up remover, lip gloss, mascara, nail enamel, nail polish, nail polish remover, night cream, rouge, skin clarifier, skin cleansing cream, skin emollient, skin lightener,] skin moisturizer,[skin toner, hair shampoo, talcum powder, shaving cream]		


U.S. Registration No.	3389253	Application Date	03/27/2007
Registration Date	02/26/2008	Foreign Priority Date	02/08/2007
Word Mark	FF FENDI		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 043. First use: Services for providing food and drink; Providing temporary accommodation Class 044. First use: Hygienic and beauty care services for human beings, namely, cosmetic body		

	care services; salon services, namely, facials, pedicures, manicures and massages; health spa services for health and wellness of the body and spirit offered at a health resort; health spa services for health and wellness of the mind, body and spirit offered in or from a remote, mobile or temporary on-site location; health spa services, namely, cosmetic body care services; making reservations and bookings for others for physical and beauty treatments at health spas
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U.S. Registration No.	3476963	Application Date	08/10/2007
Registration Date	07/29/2008	Foreign Priority Date	NONE
Word Mark	FF FENDI		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 012. First use: Baby carriages; prams; strollers; push chairs		

U.S. Registration No.	3550487	Application Date	02/12/2008
Registration Date	12/23/2008	Foreign Priority Date	01/09/2008
Word Mark	FF FENDI		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 027. First use: Carpets, rugs, mats and matting, linoleum for covering existing floors; floor coverings; non-textile wall hangings		

U.S. Registration No.	3654811	Application Date	02/10/2006
Registration Date	07/14/2009	Foreign Priority Date	NONE
Word Mark	FF FENDI 1925		

<p>Design Mark</p>	
<p>Description of Mark</p>	<p>The mark consists of the configuration of a three-dimensional object, consisting of a two-sided coin. The first side of the coin consists of the wording "FENDI DEL 1925" and a star design appearing in the border of the coin, and a two headed portrait design consisting of two bearded men. A stylized squirrel design appears beneath the portrait design. The letters "FF" appear on the men's head. The second side of the coin consists of a repetitive design consisting of the letters "FF" in a circle and a wreath design encircling a stylized squirrel eating a nut. The wording "DEL 1925" appears beneath the stylized squirrel design.</p>
<p>Goods/Services</p>	<p>Class 003. First use: Soaps; perfumery, essential oils, cosmetics, hair lotions; dentifrices</p> <p>Class 009. First use: Protective helmets for sports, goggles for sports; spectacles, eye glasses, sunglasses, cases for eyeglasses, eyeglass frames, eyeglass lenses, eyeglass cords and chains, structural parts and fittings for eyeglasses; cases for mobile phones and mp3 players, disc holders; electronic agendas; photographic cameras</p> <p>Class 014. First use: Watches, clocks, watch cases, parts and fittings for watches; horological and chronometric instruments, chronometers; key-rings of precious metal; rings, ear rings, cuff links, bracelets, charms of precious metal, brooches, necklaces, ankle chains, tie pins, pins of jewelry, medallions, jewelry; precious stones, precious metals and precious metal alloys, pearls; golden pens, candlesticks of precious metals, buckles of precious metals, jewelry of precious metals, cigarette and cigar cases of precious metals; ashtrays; jewelry boxes, money clips; stop watches, wrist watches, pocket watches, watch cases, travel clocks</p> <p>Class 018. First use: Leather and imitation leather, furs, umbrellas, parasols, walking sticks, whips, harness, saddlery, animal skins, animal hides, traveling bags, handbags, shoulder bags, briefcases, attache cases, trunks, leatherwear, namely, key cases, purses, wallets, suitcases, backpacks, rucksacks, vanity cases sold empty, business card cases, sport bags, waist bags, beach bags, bags for campers, boxes made of leather, school bags, pouches, leather straps, trolleys</p> <p>Class 024. First use: Textile fabrics for the manufacturing of clothing, bedspreads and textile tablecloths, pocket handkerchiefs, handkerchiefs, kerchiefs, fabrics for textile use, towels, textile wall hangings</p> <p>Class 025. First use: Clothing, namely, shirts, t-shirts, undershirts, sweatshirts, sport shirts, pants, sport pants, trousers, jeans, shorts, skirts, dresses, underpants, undergarments, corsets, lingerie, belts, sweaters, cardigans, pullovers, business suits, suits, waistcoats, smoking jackets, tuxedos, tailcoats, coats, jackets, fur coats, shawls, scarves, foulards, neckties, bowties, gloves, stockings, tights, socks, footwear, shoes, sport shoes, boots, slippers, sneakers, sandals, waterproof clothing, namely, waterproof jackets, waterproof shirts, waterproof pants, waterproof</p>

	headwear, swimsuits, pyjamas, headbands, caps, hats, visors, ear muffs
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Attachments	79045577#TMSN.jpeg (1 page)(bytes) 79053020#TMSN.jpeg (1 page)(bytes) 79042015#TMSN.jpeg (1 page)(bytes) 72428762#TMSN.gif (1 page)(bytes) 73104747#TMSN.gif (1 page)(bytes) 73769755#TMSN.gif (1 page)(bytes) 79033351#TMSN.jpeg (1 page)(bytes) 73537277#TMSN.gif (1 page)(bytes) 73575164#TMSN.gif (1 page)(bytes) 73575165#TMSN.gif (1 page)(bytes) 73613669#TMSN.gif (1 page)(bytes) 74407036#TMSN.gif (1 page)(bytes) 79038079#TMSN.jpeg (1 page)(bytes) 79043768#TMSN.jpeg (1 page)(bytes) 79052014#TMSN.jpeg (1 page)(bytes) 79029227#TMSN.jpeg (1 page)(bytes) NOO FF Fendi.tif (12 pages)(444751 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 USPS Express Mail Post Office to Addressee on this date.

Signature	/LARRY H. TRONCO/
Name	Larry H Tronco
Date	12/15/2010

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

FENDI ADELE S.R.L.,

Opposer,

v.

ANDERSON BELL,

Applicant.


Opposition No.:



Mark:


Serial No.: 85/086,424

NOTICE OF OPPOSITION

In the matter of Application Serial No. 85/086,424 for registration of the claimed stylized trademark  (the “FF Design”), for “advertising and sponsorship, namely, promoting the goods and services of others through event, product, and ticket marketing; advertising and sponsorship, namely, promoting the goods and services of others through marketing concerts, parties, food and beverage events, museum events, fashion shows, tournaments, fundraisers, sporting events, night clubs, and night club events” in International Class 35 filed on July 16, 2010 by Anderson Bell, an individual domiciled at 512 North McClurg Ct., #3909, Chicago, IL 60611, which was published in the Official Gazette of November 16, 2010, Fendi Adele S.R.L., a company located at Via Flaminia, 968, Rome, Italy, believes that it would be damaged by such registration and hereby opposes the same.

The grounds of the opposition are as follows:

1. Opposer is a well known Italian design company famous for its clothing, handbags, furs, and shoes. Opposer also sells, among other things, cosmetics, accessories, luggage, leather products, jewelry, and eyeglasses. In connection therewith, the Opposer participates in and organizes fashion shows and promotes and sponsors concerts, parties, charity and other social events in the United States and around the world (hereinafter, all of the above shall be collectively referred to as the “Goods and Services.”)



2. Since at least as early as 1972, Opposer has used the famous FF design logo, , (the “Fendi Logo”) in interstate commerce. The Opposer has continuously used said mark to identify and distinguish Opposer’s Goods and Services from those of others. The Opposer has advertised and promoted the Goods and Services bearing the Fendi Logo making clear and prominent use of that trademark to identify and distinguish Opposer’s Goods and Services from those sold and rendered by others. As a result of such advertising and promotion, Opposer has enjoyed extensive distribution and sales of its Goods and Services sold and rendered under Opposer’s Fendi Logo.





3. Prior to the filing date of Applicant’s application, the Fendi Logo has been and continues to be used by Opposer for the purposes of identifying and distinguishing Opposer’s Goods and Services from the goods and services of others and the trade, and the consuming public have come to know and recognize said trademark as identifying the Goods and Services of Opposer as the source thereof exclusively.


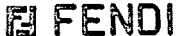
4. As a result of the care and skill exercised by Opposer in the conduct of its business, the uniform standards of high quality of the Goods and Services offered and sold under





the Opposer's Fendi Logo, the extensive advertising and promotion of the Fendi Logo, the broad scope of Goods and Services sold and rendered under the Fendi Logo and the public acceptance thereof, the Fendi Logo has become well and favorably known by the trade and public, identifying and distinguishing Opposer as the exclusive source or origin of Opposer's Goods and Services promoted, sold and rendered under said mark. Opposer is without question one of the world's leading couture houses of fashion. Opposer's mark is strong and has become famous, symbolizing and embodying goodwill of inestimable value.




5. Opposer is the owner of the following registrations on the Principal Register in the United States Patent and Trademark Office:


Mark	Reg. Date	Goods/Services
F F (Stylized)  SN:79-045577 RN:3,472,633	July 22, 2008	Class 20: Furniture, mirrors, frames; table tops, coat hangers and jewelry boxes made of wood, cork, reed, cane, wicker, horn, bone, ivory, whalebone, shell, amber, mother of pearl, meerschaum, plastic; packaging containers made of plastic
F SELLERIA FENDI and Design  SN:79-053020 RN:3,554,472	December 30, 2008	Class 14: Precious metals and their alloys; goods, namely, key rings, rings, earrings, cuff links, bracelets and charms of precious metals, brooches, necklaces, ankle chains, tie pins, pins of jewelry, medallions in precious metals or coated therewith; jewelry, precious stones; horological and chronometric instruments


Mark	Reg. Date	Goods/Services
FENDI (Stylized)  SN:79-042015 RN:3,476,908	July 29, 2008	Class 20: Furniture, namely, sofas, beds, convertible sofa-beds, chairs, seats, arm-chairs, tables, desks, wardrobes, upholstered poufs, backless couches, furniture screens; goods, namely, picture frames, coat hangers and mirrors made of wood, cork, reed, cane, wicker, horn, bone, ivory, whalebone, shell, amber, mother-of-pearl, meerschaum and substitutes for all these materials Class 24: Textile fabrics for the manufacture of clothing, bedspreads, and textile tablecloths; fabric for textile use; pocket handkerchiefs, handkerchiefs; textile wall hangings; home linens, namely, towels, sheets, pillowcases, quilts, bedspreads, bed blankets for decoration made of cashmere, wool, silk, cotton or polyester, textile table cloths, textile napkins, textile place mats, fabric and plastic curtains
FF (Stylized)  SN:72-428762 RN:1,214,472	October 26, 1982	Class 18: Luggage, trunks and travelling bags Class 22: Umbrellas and parasols
FF (Stylized)  SN:73-104747 RN:1,267,539	February 21, 1984	Class 3: Perfumes, toilet water, face soap, bath soap, skin cleansing and moisturizing creams and lotions, hair creams and lotions, lipstick, eye shadow, mascara, rouge, face powder, talcum powder Class 24: Bed sheets, pillow covers, bed covers, table cloths, cloth napkins, towels, fabric linings used for articles of clothing-namely, cloth coats, jackets, hats, gloves, shoes, fur coats; handkerchiefs Class 25: Fur coats, fur stoles, fur pieces, rainwear, cloth coats, jackets, skirts, trousers, dresses, hosiery, shirts, blouses, headwear, scarves, foulards, gloves, ties, neckwear, socks, stockings, belts, swimwear, lingerie, shoes, boots and slippers Class 26: Belt buckles, handbag clasps, and zipper tags and buttons used on items of clothing
FF and Design  SN:73-769755 RN:1,583,578	February 20, 1990	Class 14: Watches, and parts thereof

Mark	Reg. Date	Goods/Services
<p>FF and Design</p>  <p>SN:79-033351 RN:3,543,724</p>	<p>December 9, 2008</p>	<p>Class 3: Soaps, namely, bath soaps in liquid, solid and gel form; perfumery, essential oils, cosmetics; hair lotions; dentifrices</p> <p>Class 9: Computer controlled laser cutting apparatus for cutting optical lenses for eyeglasses; protective helmets for sports, goggles for sports, spectacles, eyeglasses, sunglasses, cases for eyeglasses, eyeglass frames, eyeglass lenses, eyeglass cords and chains, structural parts and fittings for eyeglasses; cases for mobile phones and mp3 players, disc holders</p> <p>Class 14: Watches, clocks, cases, parts and fittings for watches; horological and chronometric instruments, chronometers; key rings of precious metals, rings, earrings, cuff links, bracelets, charms of precious metals, brooches, necklaces, ankle chains, tie pins, pins of jewelry, medallions, jewelry, precious stones, precious metals and precious metal alloys, pearls; gold pens; candlesticks of precious metals; buckles of precious metals; jewelry of precious metals; cigarette and cigar cases of precious metals, ashtrays; jewelry boxes; money clips; stopwatches, wristwatches, pocket watches, watch cases, travel clocks</p> <p>Class 18: Leather and imitation leather, furs; umbrellas, parasols, walking sticks, whips, harness, saddlery; animal skins, animal hides; traveling bags, handbags, shoulder bags, briefcases, attaché cases, trunks; leatherwear, namely, key cases, purses, wallets, shopping bags, suitcases, backpacks, rucksacks; vanity cases sold empty, business card cases made of leather; sport bags, waist bags, beach bags, bags for campers; boxes made of leather; school bags, pouches; leather straps, luggage trolleys made of leather, namely, non-motorized luggage carts</p> <p>Class 25: Clothing, namely, shirts, t-shirts, undershirts, sweatshirts, sport shirts, pants, sport pants, trousers, jeans, shorts, skirts, dresses, underpants, undergarments, corsets, lingerie, belts, sweaters, cardigans, pullovers, business suits, suits, waistcoats, smoking jackets, tuxedos, tailcoats, coats, jackets, fur coats, shawls, scarves, foulards, neckties, bowties, gloves, stockings, tights, socks, footwear, shoes, sport shoes, boots, slippers, sneakers, sandals, swimsuits, pajamas, headwear, headbands, kerchiefs, caps, hats, visors, ear muffs; waterproof clothing, namely, waterproof jackets, waterproof shirts, waterproof pants, waterproof headwear</p>
<p>FF FENDI (Stylized)</p>  <p>SN:73-537277 RN:1,377,804</p>	<p>January 14, 1986</p>	<p>Class 3: Face soaps, deodorant, deodorant soaps, essential oils used for beauty and cosmetic purposes, bath salts, bath lotions and gels, (beauty masks, beauty milk baths, cottons, cotton balls for cosmetic purposes, toothpastes, eye shadow, foundation cream, eau-de-cologne, eye make-up, eyebrow pencils, hair dyes, hair lotions, permanent wave preparations, lipsticks, cosmetic lotions, make-up, face powder, detergent to remove make-up, mouthwash, nail varnish, perfumes, sachets, hair dressings, hair shampoo, shaving cream and talcum powder</p>

Mark	Reg. Date	Goods/Services
FF FENDI (Stylized)  SN:73-575164 RN:1,433,773	March 24, 1987	Class 14: Alarm clocks and watches not made wholly or in part of precious metals; costume jewelry, namely, [earrings, cufflinks, and ornamental pins, bracelets, brooches, chains; cigarette cases, cigar boxes, and ashtrays of precious metals; necklaces, rings, trinkets Class 16: Albums, calendars, note cards and greeting cards, diaries, fountain pens, ink, notebooks, paper knives, paper weight, pencils, pens, playing cards, writing pads Class 26: Lace and embroidery, ribbons and braids, buttons, press buttons, hooks and eyes, pins and needles, artificial flowers Class 34: Ashtrays, cigar and cigarette cases, lighters, cigar cutters, matchboxes, matches, smoker's sets including cigar cutters, cigarette holders, tobacco pouches and jars, not made wholly or in part of precious metal
FF FENDI (Stylized)  SN:73-575165 RN:1,439,955	May 19, 1987	Class 18: Attaché cases, backpacks, tote bags, briefcases, key cases, credit card cases, garment bag for travel, handbags, shoulder bags, luggage, passport cases, briefcase type portfolios, suitcases, trunks for travelling and umbrellas Class 24: Bath linen, bed clothes and linen, bedspreads, handkerchiefs, household linen, pillowcases, quilts, table napkins and cloths, silk, woolen, velvet and cotton fabrics used in the manufacture of clothing Class 25: Bathing suits, bathrobes, beachwear, belts, blazers, blouses, blousons, shoes, boots and slippers, cardigans, coats, fur coats, overcoats, dresses, gloves, gowns, hats and headwear, jackets, jeans, jumpers, rain coats, scarves, shawls, shirts, skirts, sleepwear, stockings, suits, t-shirts, ties, trousers, vests
FF FENDI (Stylized)  SN:73-613669 RN:1,476,586	February 16, 1988	Class 9: Spectacles, spectacle frames and spectacle cases
FF FENDI (Stylized)  SN:74-407036 RN:1,845,311	July 19, 1994	Class 3: Eye shadow, foundation cream, eye make-up, eyebrow pencils, lipsticks, cosmetic skin, face and] body lotions, make-up, face powder, nail varnish, detergent to remove make-up; blusher, eye make-up remover, lip gloss, mascara, nail enamel, nail polish, nail polish remover, night cream, rouge, skin clarifier, skin cleansing cream, skin emollient, skin lightener, skin moisturizer, skin toner, hair shampoo, talcum powder, shaving cream

Mark	Reg. Date	Goods/Services
FF FENDI (Stylized)  SN:79-038079 RN:3,389,253	February 26, 2008	Class 43: Services for providing food and drink; providing temporary accommodation Class 44: Hygienic and beauty care services for human beings, namely, cosmetic body care services; salon services, namely, facials, pedicures, manicures and massages; health spa services for health and wellness of the body and spirit offered at a health resort; health spa services for health and wellness of the mind, body and spirit offered in or from a remote, mobile or temporary on-site location; health spa services, namely, cosmetic body care services; making reservations and bookings for others for physical and beauty treatments at health spas
FF FENDI (Stylized)  SN:79-043768 RN:3,476,963	July 29, 2008	Class 12: Baby carriages; prams; strollers; push chairs
FF FENDI (Stylized)  SN:79-052014 RN:3,550,487	December 23, 2008	Class 27: Carpets, rugs, mats and matting, linoleum for covering existing floors; floor coverings; non-textile wall hangings

Mark	Reg. Date	Goods/Services
<p>FF FENDI 1925 and Design</p>  <p>SN:79-029227 RN:3,654,811</p>	<p>July 14, 2009</p>	<p>Class 3: Soaps; perfumery, essential oils, cosmetics, hair lotions; dentifrices</p> <p>Class 9: Protective helmets for sports, goggles for sports; spectacles, eye glasses, sunglasses, cases for eyeglasses, eyeglass frames, eyeglass lenses, eyeglass cords and chains, structural parts and fittings for eyeglasses; cases for mobile phones and mp3 players, disc holders; electronic agendas; photographic cameras</p> <p>Class 14: Watches, clocks, watch cases, parts and fittings for watches; horological and chronometric instruments, chronometers; key-rings of precious metal; rings, ear rings, cuff links, bracelets, charms of precious metal, brooches, necklaces, ankle chains, tie pins, pins of jewelry, medallions, jewelry; precious stones, precious metals and precious metal alloys, pearls; golden pens, candlesticks of precious metals, buckles of precious metals, jewelry of precious metals, cigarette and cigar cases of precious metals; ashtrays; jewelry boxes, money clips; stop watches, wrist watches, pocket watches, watch cases, travel clocks</p> <p>Class 18: Leather and imitation leather, furs, umbrellas, parasols, walking sticks, whips, harness, saddlery, animal skins, animal hides, traveling bags, handbags, shoulder bags, briefcases, attaché cases, trunks, leatherwear, namely, key cases, purses, wallets, suitcases, backpacks, rucksacks, vanity cases sold empty, business card cases, sport bags, waist bags, beach bags, bags for campers, boxes made of leather, school bags, pouches, leather straps, trolleys</p> <p>Class 24: Textile fabrics for the manufacturing of clothing, bedspreads and textile tablecloths, pocket handkerchiefs, handkerchiefs, kerchiefs, fabrics for textile use, towels, textile wall hangings</p> <p>Class 25: Clothing, namely, shirts, t-shirts, undershirts, sweatshirts, sport shirts, pants, sport pants, trousers, jeans, shorts, skirts, dresses, underpants, undergarments, corsets, lingerie, belts, sweaters, cardigans, pullovers, business suits, suits, waistcoats, smoking jackets, tuxedos, tailcoats, coats, jackets, fur coats, shawls, scarves, foulards, neckties, bowties, gloves, stockings, tights, socks, footwear, shoes, sport shoes, boots, slippers, sneakers, sandals, waterproof clothing. Namely, waterproof jackets, waterproof shirts, waterproof pants, waterproof headwear, swimsuits, pajamas, headbands, caps, hats, visors, ear muffs</p>

Mark	Reg. Date	Goods/Services
<p data-bbox="181 310 446 359">FF FENDI SELLERIA and Design</p>  <p data-bbox="181 493 332 541">SN:79-022438 RN:3,389,075</p>	<p data-bbox="477 310 678 338">4February 26, 2008</p>	<p data-bbox="760 310 1456 520">Class 18: Leather and imitation leather, furs, umbrellas, parasols, walking sticks, whips, harness, saddlery, animal skins, animal hides, traveling bags, handbags, shoulder bags, briefcases, attaché cases, trunks, leatherwear, namely, key cases, purses, wallets, shopping bags, suitcases, backpacks, rucksacks, vanity cases sold empty, business card cases, sport bags, waist bags, beach bags, bags for campers, boxes made of leather, school bags, pouches, leather straps, luggage trolleys, namely, non-motorized luggage carts</p> <p data-bbox="760 541 1456 625">Class 24: Textile fabrics for the manufacturing of clothing, bedspreads and textile tablecloths, pocket handkerchiefs, handkerchiefs, fabrics for textile use, towels, textile wall hangings</p> <p data-bbox="760 646 1456 909">Class 25: Clothing, namely, shirts, t-shirts, undershirts, sweatshirts, sport shirts, pants, sport pants, trousers, jeans, shorts, skirts, dresses, underpants, undergarments, corsets, lingerie, belts, sweaters, cardigans, pullovers, business suits, suits, waistcoats, smoking jackets, tuxedos, tailcoats, coats, jackets, fur coats, shawls, scarves, foulards, neckties, bowties, gloves, stockings, tights, socks, footwear, shoes, sport shoes, boots, slippers, sneakers, sandals, swimsuits, pajamas, headwear, headbands, kerchiefs, caps, hats, visors, ear muffs; waterproof clothing, namely, waterproof jackets, waterproof shirts, waterproof pants, waterproof headwear</p> <p data-bbox="760 930 1456 1035">Class 26: Lace and embroidery, ribbons and braid, buttons, namely, shirt buttons and novelty buttons, hooks and eyes, sewing pins, safety pins, needles, pins and buttons for garments, bags, and leather ware, artificial flowers</p>

Said registrations are valid and subsisting, in full force and effect, and have not been cancelled.

Reg. No. 1,214,472 and 1,267,539 have been in force for more than thirty-five (35) years and are valid and incontestable by operation of law.

6. The Fendi Logo is described in several of the above registrations as “consisting of the letters FF, with the second ‘F’ inverted and facing the first.”

7. Applicant’s alleged mark is described in the publication as “consisting of the letter ‘F’ intertwined at an angle with an inverted letter ‘F’.” The respective descriptions of the FF Design and the Fendi Logo are nearly identical. Moreover, the stylized font and the position of the letters of the FF Design are featured in such a way as to be a colorable imitation of the

famous Fendi Logo. The primary difference between the respective marks is that Applicant's mark is slightly angled.

8. By the application herein opposed, Applicant seeks to register the FF Design as a trademark for numerous services, including the marketing and promotion of concerts, parties, food and beverage events, museum events, fundraisers, and fashion shows.

9. Applicant's services in Class 35, which are offered under its alleged mark FF Design, are identical or complement the Goods and Services promoted, offered and provided by Opposer under the Fendi Logo.

10. The services in Class 35 covered by the application for registration of the alleged mark FF Design will be encountered by the same or similar class of purchasers as those who are interested in or familiar with the Goods and Services promoted, offered and provided by Opposer under the Fendi Logo.

11. The services in Class 35 on which Applicant's claimed mark are intended to be used and the Goods and Services on or in connection with which Opposer has used and continues to use its Fendi Logo will be advertised, promoted, offered, and distributed through the same or similar channels of trade to the same or similar classes of purchasers, and the use of the same or a similar mark in connection with such services will be likely to cause confusion, or to cause mistake, or to deceive purchasers, all to the damage of Opposer.

12. Applicant's claimed mark FF Design so closely resembles Opposer's registered Fendi Logo as to be likely, when applied to Applicant's services, to cause confusion, or to cause mistake, or to deceive purchasers, all to the damage of Opposer.

13. Applicant's claimed mark FF Design so closely resembles Opposer's Fendi Logo so that purchasers will mistakenly believe that Opposer is the source of Applicant's services or that Opposer has authorized, sponsored, approved of, or in some manner associated itself with services of Applicant thereby causing a likelihood of confusion, all to the damage of Opposer.

14. Opposer will be damaged by the registration sought by Applicant because such registration would support and assist Applicant in the confusing and misleading use of Applicant's mark and would give color of exclusive statutory rights to Applicant in violation and derogation of the prior and superior rights of Opposer to the well known Fendi Logo.

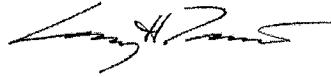
15. As alleged above, Opposer adopted and used and has continued to use the Fendi Logo in interstate commerce long before Applicant filed for the FF Design. The Fendi Logo has since become a famous mark with strong and distinctive character qualifying for protection under Section 13 (15 U.S.C. § 1063 as amended) and Section 43(c) (15 U.S.C. § 1125(c) as amended) of the Lanham Act.

16. Opposer's Fendi Logo is a famous mark within the meaning of Section 43(c) of the Trademark Act of 1946, as amended, and the registration and use by Applicant of the FF Design would cause dilution of the distinctive quality of the Opposer's mark under Section 43(c).

17. By reason of the foregoing, Opposer believes it will be damaged by the registration of Applicant's claimed trademark.

WHEREFORE, Opposer requests that the registration sought by Applicant be refused and that this Notice of Opposition be sustained.

Respectfully submitted,



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Dated: December 15, 2010

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