

ESTTA Tracking number: **ESTTA761012**

Filing date: **07/27/2016**

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 parties oppose registration of the indicated application.

**Opposers Information**

Name	Duke University
Granted to Date of previous extension	07/27/2016
Address	Office of University Counsel 310 Blackwell St., 4th Floor Durham, NC 27701 UNITED STATES

Name	Michael Krzyzewski
Granted to Date of previous extension	07/27/2016
Address	Schwartz-Butters Athletic Center 306 Towerview Dr. Durham, NC 27708 UNITED STATES

Attorney information	Susan Freya Olive Olive & Olive, P.A. 500 Memorial St. Durham, NC 27701 UNITED STATES emailboxTTAB@oliveandolive.com, solive@oliveandolive.com
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**Applicant Information**

Application No	86803502	Publication date	03/29/2016
Opposition Filing Date	07/27/2016	Opposition Period Ends	07/27/2016
Applicant	Caroline Clater 1700 Wade Hampton Blvd Greenville, SC 29614 UNITED STATES		

**Goods/Services Affected by Opposition**

Class 040. First Use: 0 First Use In Commerce: 0 All goods and services in the class are opposed, namely: Imprinting messages on wearing apparel and mugs
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**Grounds for Opposition**

Priority and likelihood of confusion	Trademark Act Section 2(d)
Dilution by blurring	Trademark Act Sections 2 and 43(c)
False suggestion of a connection with persons,	Trademark Act Section 2(a)

living or dead, institutions, beliefs, or national symbols, or brings them into contempt, or disrepute	
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### Marks Cited by Opposer as Basis for Opposition

U.S. Registration No.	2092816	Application Date	05/01/1996
Registration Date	09/02/1997	Foreign Priority Date	NONE
Word Mark	CAMERON CRAZIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 200. First use: First Use: 1992/03/17 First Use In Commerce: 1992/03/17 membership in an unincorporated association of fans of applicant's sports team who have as their common purpose the support of the applicant's sports teams		

U.S. Registration No.	2100928	Application Date	03/25/1996
Registration Date	09/30/1997	Foreign Priority Date	NONE
Word Mark	CAMERON CRAZIE D		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 025. First use: First Use: 1992/03/17 First Use In Commerce: 1992/03/17 clothing, namely, shirts		

U.S. Registration No.	2166637	Application Date	01/31/1996
Registration Date	06/16/1998	Foreign Priority Date	NONE
Word Mark	CAMERON CRAZIE		
Design Mark			

Description of Mark	NONE
Goods/Services	Class 006. First use: First Use: 1997/05/13 First Use In Commerce: 1997/05/13 key holders made primarily of metal Class 020. First use: First Use: 1997/05/16 First Use In Commerce: 1997/05/16 pillows Class 028. First use: First Use: 1997/05/13 First Use In Commerce: 1997/05/13 Christmas tree ornaments

U.S. Registration No.	2206001	Application Date	01/31/1996
Registration Date	11/24/1998	Foreign Priority Date	NONE
Word Mark	CAMERON CRAZIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 016. First use: First Use: 1997/08/21 First Use In Commerce: 1997/08/21 decals Class 021. First use: First Use: 1997/05/13 First Use In Commerce: 1997/05/13 cups, and mugs not made of precious metal Class 024. First use: First Use: 1997/05/16 First Use In Commerce: 1997/05/16 pennants		

U.S. Application/ Registration No.	NONE	Application Date	NONE
Registration Date	NONE		
Word Mark	CAMERON CRAZIE		
Goods/Services	Used as a trademark to identify a wide range of products sold and licensed by Duke University, in many areas of endeavor, to men, women and children of all ages. For purposes of this proceeding, the products can generally be defined as consumer goods, and those asserted herein are the following: # Personal grooming product (including, by way of example, nail files); # Clothing for babies, children, men and women (including, by way of example, shirts); # Beverage ware and drinkware (including by way of example, mugs); # DÃ©cor and ornaments # Automobile and other vehicular decorative accessories (including by way of example banners, flags, key holders, and pennants); # Sports memorabilia; university memorabilia; fanware; gift items intended to remind recipients of Duke University or some aspect of the services and entertainment provided by Duke University and its affiliates # Publications # And, all products listed in the trademark registrations recited in the Notice of Opposition and all products and services listed with respect to this mark in the text of the Notice of Opposition.		

U.S. Application/ Registration No.	NONE	Application Date	NONE
Registration Date	NONE		
Word Mark	CAMERON CRAZIES		
Goods/Services	An unincorporated association of fans of Duke University and its sports teams, who have as their common purpose the support of the		

	sports teams		
U.S. Application/ Registration No.	NONE	Application Date	NONE
Registration Date	NONE		
Word Mark	CAMERON CRAZIES		
Goods/Services	Used as a trademark and as a service mark to identify a wide range of products sold and licensed by Duke University, and services provided by Duke University, in many areas of endeavor, to men, women and children of all ages. For purposes of this proceeding, the products can generally be defined as consumer goods, and the products and services asserted herein are the following: # Personal grooming product (including, by way of example, nail files); # Clothing for babies, children, men and women (including, by way of example, shirts); # Beverage ware and drinkware (including by way of example, mugs); # D@cor and ornaments # Digital publications and media for enhancing the appearance of electronic device screens # Automobile and other vehicular decorative accessories (including by way of example banners, flags, key holders, and pennants); # Sports memorabilia; university memorabilia; fanware; gift items intended to remind recipients of Duke University or some aspect of the services and entertainment provided by Duke University and its affiliates # Publications # Entertainment services # Providing facilities for entertainment # And, all products listed in the trademark registrations recited in the Notice of Opposition and all products and services listed with respect to this mark in the text of the Notice of Opposition.		
U.S. Application/ Registration No.	NONE	Application Date	NONE
Registration Date	NONE		
Word Mark	CAMERON INDOOR STADIUM		
Goods/Services	Entertainment services in the nature of sporting events and university events; provision of information of interest to the University and its athletic programs		
U.S. Application/ Registration No.	NONE	Application Date	NONE
Registration Date	NONE		
Word Mark	CRAZIES WHO CARE		
Goods/Services	Services related to student fundraising and charitable giving		
U.S. Application/ Registration No.	NONE	Application Date	NONE
Registration Date	NONE		
Word Mark	KRZYZEWSKI		
Goods/Services	Coaching services; teaching services; entertainment services; education services; sports camp services; clothing; products for fans of Duke University and of Coach Krzyzewski; publications including books; provision of information concerning Duke University, sports, and leadership		
Attachments	75078947#TMSN.png( bytes )		

	20160727 NOO - Duke and Krzyzewski v Clater.pdf(290791 bytes ) 20160727 Combined Exhibits 1-5.pdf(514587 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	/SFO/
Name	Susan Freya Olive
Date	07/27/2016

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
Before the Trademark Trial and Appeal Board**

IN THE MATTER OF Trademark Application of Caroline Clater  
For Registration of CAMERON KRZYZ, Serial No. 86803502  
Published for Opposition in the Official Gazette on March 29, 2016  
Goods/Services Opposed: All

Duke University and Michael W. Krzyzewski, Plaintiffs-Opposers vs. Caroline Clater, Defendant-Applicant	<b>OPPOSITION TO REGISTRATION OF MARK</b>
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Attorney Reference: DUKU9427 & KRMW9004

Duke University (hereafter “Duke”), a corporation of the State of North Carolina, with a principal place of business in Durham, North Carolina and business address at Office of University Counsel, Duke University, Durham, North Carolina, and Michael W. Krzyzewski (hereafter “Krzyzewski”), an individual residing in the State of North Carolina, with an address at Schwartz-Butters Athletic Center, 306 Towerview Drive, Durham, NC 27708, believe that they will be damaged by registration of the mark shown in the above-identified application (hereafter referred to as “Applicant’s Application”), and hereby oppose same.

Opposers bring their claims pursuant to Trademark Act Section 2(d), 15 U.S.C. §1052(d), alleging priority and likelihood of confusion; pursuant to Trademark Act Sections 2 and 43(c), 15 U.S.C. §§ 1052 and 1125(c), alleging dilution by blurring; and pursuant to Trademark Act Section 2(a), 15 U.S.C. §1052(a), alleging false suggestion of a connection with a person (Krzyzewski) and institution (Duke). The grounds for opposition are more particularly set out as follows. Headings are interposed for convenience; all allegations are deemed incorporated into each ground for opposition,

as though realleged for each.

## **FACTS PERTINENT TO ALL CLAIMS**

### **OPPOSERS**

1. Duke is a university providing, among other things, a first class academic program, a world-renowned teaching hospital and medical facilities, and a well-known Division I athletic program. Duke's internationally recognized athletic program (including its famous basketball program) is followed by sports fans across the country.
2. Krzyzewski is the well-known head coach of Duke University's men's basketball team, a position which he has held for over 36 years.

### **OPPOSERS' MARKS AND NAME, AND THEIR FAME AND ASSOCIATION WITH OPPOSERS**

3. Duke is the owner of the marks CAMERON CRAZIE and CAMERON CRAZIES (collectively referred to hereafter as Duke's CAMERON CRAZIE/S Marks), and has used those marks for decades to refer to the unincorporated association of lively and creative students and other fans who have as their common purpose to support Opposer's sports teams, and to identify the individual members of that group. This unincorporated association is effectively a Duke institution, and the mark that identifies it (which as hereafter set out is a registered mark owned by Duke) is entitled to protection as the name and mark of an institution.
4. Duke also uses Duke's CAMERON CRAZIE/S Marks to identify goods offered by Duke and its licensees, including but not limited to clothing, mugs, key chains, and other paraphernalia of interest to fans and that fans can wear or display to show their allegiance to Duke and its sports teams.
5. The word CAMERON of Duke's CAMERON CRAZIE/S Marks is a reminder of Cameron Indoor Stadium, the venue for Duke's basketball home games. Cameron Indoor Stadium has

itself been the subject of hundreds of articles and publications for more than three decades, in well-respected national media including *Forbes*, ESPN, CNN, and the *Wall Street Journal*.

6. Duke's CAMERON CRAZIE/S Marks are viewed and heard by literally millions of fans each year during television and radio broadcasts as well as in print media and online. For example, broadcasts to millions of consumers every year feature Duke's men's basketball team's games played in Cameron Indoor Stadium, in which the members of the CAMERON CRAZIES are often shown wearing apparel imprinted with Duke's CAMERON CRAZIE/S Marks; and similar publicity is transmitted to the national consumer market in discussion of Duke, its games, its fans, and its coach by national television networks, publications, and other sources throughout the years.
7. The marks CAMERON CRAZIE and CAMERON CRAZIES are instantaneously and immediately associated with Duke and Duke's institution by the public and have no significant meaning to the public except in connection with Duke.
8. Krzyzewski is famous as a coach and as a leader, and his name has become famous, particularly in association with Duke basketball, the stadium where it is played, and its supportive fans. This nationwide fame arises from his extraordinary success as a coach at Duke, and from his recognized leadership as a role model and motivator in the collegiate and general business arena. For example:
  - a. He is the coach with the most wins in National Collegiate Athletic Association ("NCAA") men's basketball history and has over 1,000 collegiate wins to his credit, the overwhelming bulk obtained during his 36 years as Duke's coach.
  - b. Games he coaches at Duke are among the most-watched in the nation, with millions watching each of many such games. A single Duke basketball game coached by



- Krzyzewski has been watched by as many as 3.1 million viewers.
- c. Duke basketball teams he has coached have appeared in post-tournament play for each of the past 21 consecutive years; have appeared in the NCAA Men's Basketball Championship "Final Four" twelve (12) times; and have won five (5) NCAA national basketball championships.
  - d. In the course of his position at Duke, he has been named National Coach of the Year twelve (12) times by organizations including *Basketball Times*, has been named Sportsman of the Year by *Sports Illustrated* and *Sporting News*, and has been inducted into the Naismith Memorial Basketball Hall of Fame.
  - e. He emphasizes the importance of education and is committed to his teams' members' success, not merely as players but also as students. During his 36 years of coaching at Duke University, only two of the men's basketball team members who remained at Duke for four years did not graduate. Coach Krzyzewski frequently receives accolades for his dedication to the "student" aspect of his student athletes' lives.
  - f. Krzyzewski is a highly sought-after speaker not only in the field of sports but also generally on the subjects of leadership, teamwork, and other topics of significant interest to the public. His position and successes at Duke are typically mentioned in advertising of such activities.
9. Krzyzewski's name not only is famous and associated primarily with him by the public, but is famously difficult to spell. ESPN and others have delighted in testing sports fans to see if they can spell the name and find that most people cannot do so despite their familiarity with it and with Krzyzewski himself. As a result of this difficulty, Krzyzewski is well-known to the public by variants of his mark and name KRZYZEWSKI, and abbreviations of the name are both

common, and recognized as associated with him.

10. Krzyzewski's name and marks associated with him are used to identify a wide variety of goods and services desired by his fans and Duke fans, including but not limited to clothing (including but not limited to t-shirts and hats); books; videos, DVDS, and other media; and basketballs and basketball cases; as well as services including sports training camps, sports education, basketball
11. Duke and its CAMERON CRAZIES fans are highly supportive of Coach Krzyzewski and show that support in the many colorful ways, all of which draw further attention to Krzyzewski and reinforce the connections between Duke, its fans, and Krzyzewski.
12. Duke's CAMERON CRAZIE/S Marks and Krzyzewski's name and marks, collectively referred to as Opposers' Marks, include CAMERON, CAMERON CRAZIE, CAMERON CRAZIES, and KRZYZEWSKI, together with those marks set out in the exhibits hereto and in the ESTTA filing receipt.
13. In connection with Opposers' Marks, Opposers provide, among other things, imprinted goods such as wearing apparel and mugs; services in the form of student organizations, including an association of individuals supporting Duke University's basketball team, coached by Opposer Krzyzewski; entertainment services in the form of athletic events and pre-game programming; athletic and personal development conferences for students, staff, and the general public on Duke University's main campus, including Cameron Indoor Stadium and the Michael W. Krzyzewski Center, and at other facilities where Opposers provide educational, medical, and entertainment services, at sporting events and other university events, as well as goods related to such services.
14. Opposers' Marks include each mark set out in the table below, which is a list of some of the United States Trademark Registrations and Applications owned by Duke covering marks that

include the terms CAMERON CRAZIE, or another term or image that reminds viewers and customers of Cameron Indoor Stadium and the Cameron Crazie/s and reinforces the link between Opposers' Marks and Duke. Each of the registrations listed below was lawfully issued, and is valid and subsisting. Copies of the electronic records provided by the United States Trademark Office for each registration/application are attached hereto as Exhibits 1 through 4 and are incorporated herein by reference and for purpose of reliance.

Exhibit	Registration No.	Issue Date	Mark
1	2,092,816	September 2, 1997	CAMERON CRAZIE
2	2,100,928	September 30, 1997	CAMERON CRAZIE D
3	2,166,637	June 16, 1998	CAMERON CRAZIE
4	2,206,001	November 24, 1998	CAMERON CRAZIE

15. Opposers' Marks also include the common law marks listed in Exhibit 5 attached hereto and incorporated herein by reference, as to which Opposers also have priority over Applicant. These marks remind viewers and customers of Opposers and their respective persons and institution, and reinforce the links between Opposers' Marks and their respective owners.
16. Opposers' Marks are used in a wide variety of fonts and colors, and are not in general limited by appearance, although appearance may be an additional feature of certain marks.

**OPPOSERS' PRIORITY  
OF USE AND OF FAME**

17. Opposer Duke University commenced use of its CAMERON CRAZIE/S Marks in commerce at least as early as 1996 and has continued and expanded that use in interstate and foreign commerce, both directly and through licensees, continuously since that time. With respect to all goods and services asserted herein, Duke's CAMERON CRAZIE/S Marks have been in continuous use in commerce since long before the earliest priority date Applicant has asserted or can claim. Moreover, Duke's CAMERON CRAZIE/S Marks became famous, and have been

uniquely associated with Duke, unmistakably pointing to Duke and the unincorporated association of its fans who have as their common purpose the support of Duke's sports teams, since long before any priority date Applicant has asserted or can claim.

18. Krzyzewski's name and variants thereof have been in use and well-known in the coaching field for well over three decades and became famous since long prior to the earliest priority date that Applicant has asserted or can claim.

**SIMILARITY OF MARKS;  
INTENT TO CREATE PRESUMPTION OF ASSOCIATION**

19. Applicant seeks to register a mark which is substantially similar in literal form and identical aurally to Opposer Duke University's, CAMERON CRAZIE/S Marks.
20. Applicant has varied her mark only by substituting a portion of Krzyzewski's name that when seen in abbreviated form, can be pronounced phonetically as "CRAZIES," namely the term "KRZYZ."
21. Rather than distinguishing Applicant's mark from Opposers' Marks, the substitution emphasizes that the mark is associated with Duke and its famous coach Krzyzewski. KRZYZ will be understood as a reference to Krzyzewski's mark and name, **KRZYZ**ewski (emphasis added).
22. Applicant intended the mark to be associated and confused with Duke and its marks, and after filing her application, contacted Duke, asserting rights under the application, in an attempt to extort Duke to negotiate with her for its use.

**COUNT I.**

**PRIORITY AND LIKELIHOOD OF CONFUSION  
TRADEMARK ACT SECTION 2(d), 15 U.S.C. § 1052(d)**

23. Applicant seeks registration of a standard character mark without claim to font style, size, or color, and which comprises the combination of the terms CAMERON and KRZYZ, without

further limitations, pursuant to Section 1(b) of the Trademark Act (15 USC § 1051(b)), for use in connection with:

“imprinting messages on wearing apparel and mugs” in International Class 40.

24. Opposers, directly and through licensees, have used and continue to use Opposers’ Marks, including Duke’s CAMERON CRAZIE/S Marks, and Krzyzewski’s own name and mark KRZYZEWSKI, as aforesaid and as set out in the exhibits, and in particular have used and continue to use Opposers’ Marks in commerce for goods and services substantially identical to the services in connection with which Applicant seeks registration, including specifically for imprinted goods (including, but not limited to, wearing apparel and mugs) and the retail sale of such goods.
25. Applicant has not alleged any earlier priority than the filing date of her application and, on information and belief, has no earlier date on which she can rely.
26. As hereinabove set out, use by each of Opposers of their respective Opposers’ Marks commenced, in all cases, prior to the earliest date that Applicant can assert.
27. By reason of their longstanding use of Opposers’ Marks, which commenced well prior to the date of Applicant’s Application and any date of use on which Applicant is entitled to rely, and by reason of Duke’s pleaded registrations, both Opposers have priority with respect to use of their respective Opposers’ Marks over Applicant and over Applicant’s use and intended use of the mark that is the subject of Applicant’s Application.
28. As hereinabove described, Applicant’s mark is substantially similar to Opposers’ Marks; and Applicant’s mark is intended to and does create confusion with respect to Opposers and Opposers’ Marks.
29. Applicant’s mark, used as identified in Applicant’s Application, is likely to cause confusion and

mistake with respect to Opposers' Marks and their use by Opposers.

## **COUNT II**

### **DILUTION**

#### **TRADEMARK ACT SECTIONS 2 & 43(c), 15 U.S.C. §§ 1052, 1125(c)**

30. As hereinabove set out, Duke's CAMERON CRAZIE/S Marks and Krzyzewski's name and mark KRZYZEWSKI each are famous.
31. Each of said marks became famous prior to the earliest priority date that Applicant has asserted or can claim with respect to Applicant's mark.
32. Duke's CAMERON CRAZIE/S Marks are so well-recognized that the public will associate these marks with Duke even when the terms are encountered apart from Duke's educational services and athletic services, or indeed any specific goods or services offered by Duke. The fame of Duke and of Duke's CAMERON CRAZIE/S Marks is so widespread and pervasive that consumers will expect and assume that not only identical marks but also similar marks are associated with Duke.
33. Krzyzewski's name and mark KRZYZEWSKI is so well-recognized that the public will associate the it with Krzyzewski even when the term and abbreviations of it are encountered apart from Krzyzewski's core basketball coaching and training services, or indeed any specific goods or services offered by Krzyzewski. Krzyzewski's fame and recognition of his name is so widespread and pervasive that consumers will expect and assume that not only identical marks but also similar marks including KRZYZ, are associated with Krzyzewski.
34. Applicant seeks to register and to use a mark that is so similar to Duke's famous CAMERON CRAZIE/S Marks that it is likely to trigger consumers to conjure up Duke when consumers are confronted with Applicant's substantially similar mark.
35. Applicant seeks to register and to use a mark that is so similar to Krzyzewski's famous name

and mark KRZYZEWSKI that it is likely to trigger consumers to conjure up Krzyzewski when consumers are confronted with Applicant's mark.

36. Despite Applicant's claim of right to use the mark she seeks to register, in connection with services and closely associated goods similar or identical to those offered by Opposers, Applicant is not affiliated with, licensed by, or otherwise associated with either of Opposers. Opposers are not connected with the services that Applicant provides, offers, or intends to offer under the mark sought to be registered.

37. Applicant's use (including the intended uses when brought to fruition) of the applied-for mark will cause dilution of the distinctive quality of Duke's CAMERON CRAZIE/S Marks and of Krzyzewski's name and mark KRZYZEWSKI. The use will diminish, dilute, and tarnish Opposers' rights in their famous marks and names and the distinctive quality thereof and the goodwill associated therewith which presently inures to the benefit of Opposers.

### **COUNT III**

#### **FALSE SUGGESTION OF A CONNECTION TRADEMARK ACT SECTION 2(a), 15 U.S.C. § 1052(a)**

38. Applicant's mark is the same as, or a close approximation of the marks of Duke and Krzyzewski, combining them in a manner intentionally calculated to bring to mind both Duke and Krzyzewski and to ensure that members of the public believe the services with which the mark is used are affiliated jointly with Duke and its famous coach Krzyzewski.

39. Krzyzewski's name and mark Krzyzewski functions not only as a trademark and service mark, but also as the name and identity of Krzyzewski, is recognized as such by consumers, and has been so recognized since long prior to the earliest priority date on which Applicant can rely. It serves to identify, and as an identity of, Krzyzewski such identification beginning long prior

to the filing date of Applicant's Application, prior to any first date of use of Applicant's mark that Applicant is entitled to assert, and prior to any other relevant priority date to which Applicant might be entitled with respect to the mark for which registration is sought, and continuing to the present time.

40. Duke's CAMERON CRAZIE/S Marks function not only as a trademark and service mark, but also as a name and identity of Duke (including in particular as the identity of its unincorporated association of sports fans), are recognized as such by consumers, and have been so recognized since long prior to the earliest priority date on which Applicant can rely. These marks serve to identify, and as an identity of, Duke and its asserted institution, such identification beginning long prior to the filing date of Applicant's Application, prior to any first date of use of Applicant's mark that Applicant is entitled to assert, and prior to any other relevant priority date to which Applicant might be entitled with respect to the mark for which registration is sought, and continuing to the present time.

41. Opposers' provision and promotion of their respective services and products to the public under their above-identified respective marks and names for many decades has caused the public to associate these Opposers' respective marks and names, and the goods and services provided thereunder, with Opposers, such association beginning long prior to the filing date of Applicant's Application, prior to any first date of use of Applicant's mark that Applicant is entitled to assert, and prior to any other relevant priority date to which Applicant might be entitled with respect to the mark for which registration is sought, and continuing to the present time. Through those efforts, each of Opposers now has built substantial goodwill in its respective name and marks that inures to the benefit of said Opposers.



42. Opposers' fame and excellent and well-known reputation and the close and long-time association of the asserted names and marks with Opposers' goods and services are such that a connection with Opposers and their goods and services is likely to be presumed when the mark Applicant seeks to register is used in connection with the services identified in the application.
43. Consumers seeking goods identified with Opposers are familiar with Opposers' Marks, associate those marks with Opposers, know that Krzyzewski is Duke's coach, know that Duke's fans appreciate and support Krzyzewski, know that Opposers license third parties to use their respective marks, assume that products bearing Opposers' Marks and closely linked marks are duly authorized for sale by Opposers or are otherwise officially connected with Opposers, and rely on their presumption that a connection exists between Opposers and their licensees and other sources of goods and services offered under Opposers' Marks to inform their purchasing decisions.
44. Applicant's mark, as sought to be registered, would lead consumers to draw false conclusions as to a connection of Applicant's services and closely associated goods with Opposers, and with Opposers' goods and services, under circumstances where such a conclusion will be material to the consumer's deliberations regarding purchase of the goods or service. Applicant's mark when used as sought to be registered, will be presumed to be affiliated with Opposers and will induce fans of Duke sports, especially fans of Duke basketball and of Duke's coach Krzyzewski, to believe Applicant's services are affiliated with Opposers and that the purchase of those services or of goods produced thereby will benefit Opposers.
45. As alleged above, despite Applicant's claim of right to use the mark it seeks to register, in connection with services and closely associated goods similar or identical to those offered by

Opposers, Applicant is not affiliated with, licensed by, or otherwise associated with either of Opposers. Opposers are not connected with the services that Applicant provides, offers, or intends to offer under the mark sought to be registered.

46. Nonetheless, Opposers and their names (including CAMERON CRAZIES and KRZYZEWSKI) and Opposers' Marks are of sufficient recognition and reputation that when Applicant's mark is used on or in connection with the services identified in Applicant's Application, a connection with Opposers will be presumed and Applicant's mark would be recognized as connected with Opposers, uniquely and unmistakably pointing to Opposers (including to Opposer Krzyzewski and to the Duke institution known as the CAMERON CRAZIES).

47. Consumers are likely to be deceived as to the connection, which does not in fact exist, and make purchasing decisions based on the false suggestion of a connection created by Applicant and her mark.

48. Registration and/or use of Applicant's mark as sought in Applicant's Application is likely to interfere with Opposers' use and exploitation of their asserted names and marks, and to falsely suggest a connection with Opposers.

### **CONCLUSION**

49. In view of the foregoing and the similarity of Opposers' prior-used and not abandoned Opposers' Marks to Applicant's applied-for mark, the similarities between the use made by Opposers, and their licensees, of Opposers' Marks and the intended uses of Applicant's mark by Applicant as identified in Applicant's Application, it is alleged that Applicant's mark as currently applied for, identified, and described, so resembles Opposers' Marks as to be likely to cause

confusion and mistake. Moreover, registration and/or use of Applicant's mark as sought in Applicant's Application is likely to interfere with Opposers' uses and exploitation of Opposers' Marks and to diminish and dilute Opposers' rights in Opposers' Marks and the distinctive quality thereof and the goodwill associated therewith which presently inures to the benefit of Opposers, and deceptively and falsely suggest a connection with Opposers.

WHEREFORE, Opposers request that Applicant's Application be denied. The Office is authorized to charge any additional fees associated with the filing of this Notice of Opposition to our deposit account 15-0490.

This 27<sup>th</sup> day of July, 2016.

**OLIVE & OLIVE, P.A.**  
Attorneys for Opposers

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CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the Notice of Opposition filed herein, together with any and all attachments thereto, has been served upon Applicant by depositing a copy of the same in the United States mail, first class postage prepaid, to wit:

Caroline Clater  
1700 Wade Hampton Blvd.  
Greenville, SC 29614

on this the 27<sup>th</sup> day of July, 2016.

*/Susan Freya Olive/*  
Susan Freya Olive  
Olive & Olive, P.A.  
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## Notice of Opposition

### Exhibit 1:

TSDR website printout of Reg. No. 2,092,816

**CAMERON CRAZIE**

Generated on: This page was generated by TSDR on 2016-04-11 09:19:51 EDT

Mark: CAMERON CRAZIE

US Serial Number: 75097257

Application Filing Date: May 01, 1996

US Registration Number: 2092816

Registration Date: Sep. 02, 1997

Register: Principal

Mark Type: Collective Membership Mark

Status: The registration has been renewed.

Status Date: Aug. 14, 2007

Publication Date: Jun. 10, 1997

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## Mark Information

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Mark Literal Elements: CAMERON CRAZIE

Standard Character Claim: No

Mark Drawing Type: 1 - TYPESET WORD(S) /LETTER(S) /NUMBER(S)

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## Goods and Services

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Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((.)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks \*..\* identify additional (new) wording in the goods/services.

For: membership in an unincorporated association of fans of applicant's sports teams who have as their common purpose the support of the applicant's sports teams

International Class(es):

U.S Class(es): 200 - Primary Class

Class Status: ACTIVE

Basis: 1(a)

First Use: Mar. 17, 1992

Use in Commerce: Mar. 17, 1992

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## Basis Information (Case Level)

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Filed Use: Yes  
Filed ITU: No  
Filed 44D: No  
Filed 44E: No  
Filed 66A: No  
Filed No Basis: No

Currently Use: Yes  
Currently ITU: No  
Currently 44D: No  
Currently 44E: No  
Currently 66A: No  
Currently No Basis: No

Amended Use: No  
Amended ITU: No  
Amended 44D: No  
Amended 44E: No

---

## Current Owner(s) Information

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**Owner Name:** Duke University  
**Owner Address:** PO BOX 3024  
Durham, NORTH CAROLINA 27710  
UNITED STATES

**Legal Entity Type:** NONPROFIT CORPORATION

**State or Country** NORTH CAROLINA  
**Where Organized:**

## Attorney/Correspondence Information

### Attorney of Record

**Attorney Name:** SUSAN FREYA OLIVE  
**Attorney Primary Email Address:** [emailboxtm@oliveandolive.com](mailto:emailboxtm@oliveandolive.com)  
**Docket Number:** DUKU0307  
**Attorney Email Authorized:** Yes

### Correspondent

**Correspondent Name/Address:** SUSAN FREYA OLIVE  
OLIVE & OLIVE PA  
PO BOX 2049  
DURHAM, NORTH CAROLINA 27702-2049  
UNITED STATES  
**Phone:** 919-683-5514  
**Fax:** 919-688-3781  
**Correspondent e-mail:** [emailboxtm@oliveandolive.com](mailto:emailboxtm@oliveandolive.com)  
**Correspondent e-mail Authorized:** Yes

**Domestic Representative - Not Found**

## Prosecution History

Date	Description	Proceeding Number
Aug. 14, 2007	REGISTERED AND RENEWED (FIRST RENEWAL - 10 YRS)	73376
Aug. 14, 2007	REGISTERED - SEC. 8 (10-YR) ACCEPTED/SEC. 9 GRANTED	
Aug. 06, 2007	ASSIGNED TO PARALEGAL	73376
Jul. 06, 2007	REGISTERED - COMBINED SECTION 8 (10-YR) & SEC. 9 FILED	
Jul. 06, 2007	TEAS SECTION 8 & 9 RECEIVED	
Mar. 02, 2007	CASE FILE IN TICRS	
Jul. 25, 2003	REGISTERED - SEC. 8 (6-YR) ACCEPTED & SEC. 15 ACK.	
Apr. 25, 2003	REGISTERED - SEC. 8 (6-YR) & SEC. 15 FILED	
Apr. 25, 2003	PAPER RECEIVED	
Sep. 02, 1997	REGISTERED-PRINCIPAL REGISTER	
Jun. 10, 1997	PUBLISHED FOR OPPOSITION	
May 09, 1997	NOTICE OF PUBLICATION	
Apr. 04, 1997	APPROVED FOR PUB - PRINCIPAL REGISTER	
Mar. 12, 1997	CORRESPONDENCE RECEIVED IN LAW OFFICE	
Sep. 09, 1996	NON-FINAL ACTION MAILED	
Sep. 03, 1996	ASSIGNED TO EXAMINER	59228
Aug. 29, 1996	ASSIGNED TO EXAMINER	68174

## Maintenance Filings or Post Registration Information

**Affidavit of Continued Use:** Section 8 - Accepted  
**Affidavit of Incontestability:** Section 15 - Accepted  
**Renewal Date:** Sep. 02, 2007

## TM Staff and Location Information

**TM Staff Information - None**

**File Location**

**Current Location:** POST REGISTRATION

**Date in Location:** Aug. 14, 2007

# Notice of Opposition

Exhibit 2:

TSDR website printout of Reg. No. 2,100,928





Generated on: This page was generated by TSDR on 2016-04-11 09:23:03 EDT

Mark: CAMERON CRAZIE D



US Serial Number: 75078947

Application Filing Date: Mar. 25, 1996

US Registration Number: 2100928

Registration Date: Sep. 30, 1997

Register: Principal

Mark Type: Trademark

Status: The registration has been renewed.

Status Date: Sep. 04, 2007

Publication Date: Jul. 08, 1997

## Mark Information

Mark Literal Elements: CAMERON CRAZIE D

Standard Character Claim: No

Mark Drawing Type: 3 - AN ILLUSTRATION DRAWING WHICH INCLUDES WORD(S)/ LETTER(S)/NUMBER(S)

Design Search Code(s): 21.03.20 - Basketballs  
27.03.05 - Objects forming letters or numerals

## Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [.] indicate deleted goods/services;
- Double parenthesis (..) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks \*..\* identify additional (new) wording in the goods/services.

For: clothing, namely, shirts

International Class(es): 025 - Primary Class

U.S Class(es): 022, 039

Class Status: ACTIVE

Basis: 1(a)

First Use: Mar. 17, 1992

Use in Commerce: Mar. 17, 1992

## Basis Information (Case Level)

Filed Use: Yes

Currently Use: Yes

Amended Use: No

Filed ITU: No

Currently ITU: No

Amended ITU: No

Filed 44D: No

Currently 44D: No

Amended 44D: No

Filed 44E: No

Currently 44E: No

Amended 44E: No

Filed 66A: No

Currently 66A: No

Filed No Basis: No

Currently No Basis: No

## Current Owner(s) Information

Owner Name: Duke University

Owner Address: P.O. Box 3024

Durham, NORTH CAROLINA UNITED STATES 27710

Legal Entity Type: NONPROFIT CORPORATION

State or Country NORTH CAROLINA  
Where Organized:

## Attorney/Correspondence Information

### Attorney of Record

Attorney Name: Susan Freya Olive

Docket Number: DUKU0304

Attorney Primary Email Address: [emailboxtm@oliveandolive.com](mailto:emailboxtm@oliveandolive.com)

Attorney Email Authorized: Yes

### Correspondent

Correspondent Name/Address: Susan Freya Olive  
OLIVE & OLIVE PA  
PO BOX 2049  
DURHAM, NORTH CAROLINA UNITED STATES 27702-2049

Phone: 919-683-5514

Fax: 919-688-3781

Correspondent e-mail: [emailboxtm@oliveandolive.com](mailto:emailboxtm@oliveandolive.com)

Correspondent e-mail Authorized: Yes

### Domestic Representative - Not Found

## Prosecution History

Date	Description	Proceeding Number
Sep. 04, 2007	REGISTERED AND RENEWED (FIRST RENEWAL - 10 YRS)	70132
Sep. 04, 2007	REGISTERED - SEC. 8 (10-YR) ACCEPTED/SEC. 9 GRANTED	
Aug. 21, 2007	ASSIGNED TO PARALEGAL	70132
Aug. 03, 2007	REGISTERED - COMBINED SECTION 8 (10-YR) & SEC. 9 FILED	
Aug. 03, 2007	TEAS SECTION 8 & 9 RECEIVED	
Feb. 28, 2007	CASE FILE IN TICRS	
Jul. 10, 2003	REGISTERED - SEC. 8 (6-YR) ACCEPTED & SEC. 15 ACK.	
Apr. 17, 2003	REGISTERED - SEC. 8 (6-YR) & SEC. 15 FILED	
Apr. 17, 2003	PAPER RECEIVED	
Sep. 30, 1997	REGISTERED-PRINCIPAL REGISTER	
Jul. 08, 1997	PUBLISHED FOR OPPOSITION	
Jun. 06, 1997	NOTICE OF PUBLICATION	
May 02, 1997	APPROVED FOR PUB - PRINCIPAL REGISTER	
Mar. 14, 1997	CORRESPONDENCE RECEIVED IN LAW OFFICE	
Sep. 29, 1996	NON-FINAL ACTION MAILED	
Sep. 27, 1996	PREVIOUS ALLOWANCE COUNT WITHDRAWN	
Aug. 22, 1996	ASSIGNED TO EXAMINER	72148
Aug. 19, 1996	APPROVED FOR PUB - PRINCIPAL REGISTER	
Aug. 13, 1996	ASSIGNED TO EXAMINER	72148

## Maintenance Filings or Post Registration Information

Affidavit of Continued Use: Section 8 - Accepted

Affidavit of Incontestability: Section 15 - Accepted

Renewal Date: Sep. 30, 2007

## TM Staff and Location Information

### TM Staff Information - None

### File Location

Current Location: POST REGISTRATION

Date in Location: Sep. 04, 2007

## Notice of Opposition

### Exhibit 3:

TSDR website printout of Reg. No. 2,166,637

Generated on: This page was generated by TSDR on 2016-04-11 09:24:57 EDT

Mark: CAMERON CRAZIE

US Serial Number: 75977192

Application Filing Date: Jan. 31, 1996

US Registration Number: 2166637

Registration Date: Jun. 16, 1998

Register: Principal

Mark Type: Trademark

Status: The registration has been renewed.

Status Date: Oct. 09, 2007

Publication Date: Sep. 24, 1996

Notice of Allowance Date: Dec. 17, 1996

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## Mark Information

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Mark Literal Elements: CAMERON CRAZIE

Standard Character Claim: No

Mark Drawing Type: 1 - TYPESET WORD(S) /LETTER(S) /NUMBER(S)

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## Related Properties Information

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Child Of: 75051074

---

## Goods and Services

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Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((...)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks \*..\* identify additional (new) wording in the goods/services.

For: key holders made primarily of metal

International Class(es): 006 - Primary Class

U.S Class(es): 002, 012, 013, 014, 023, 025, 050

Class Status: ACTIVE

Basis: 1(a)

First Use: May 13, 1997

Use in Commerce: May 13, 1997

For: pillows

International Class(es): 020 - Primary Class

U.S Class(es): 002, 013, 022, 025, 032, 050

Class Status: ACTIVE

Basis: 1(a)

First Use: May 16, 1997

Use in Commerce: May 16, 1997

For: Christmas tree ornaments

**International Class(es):** 028 - Primary Class

**U.S Class(es):** 022, 023, 038, 050

**Class Status:** ACTIVE

**Basis:** 1(a)

**First Use:** May 13, 1997

**Use in Commerce:** May 13, 1997

## Basis Information (Case Level)

**Filed Use:** No

**Currently Use:** Yes

**Amended Use:** No

**Filed ITU:** Yes

**Currently ITU:** No

**Amended ITU:** No

**Filed 44D:** No

**Currently 44D:** No

**Amended 44D:** No

**Filed 44E:** No

**Currently 44E:** No

**Amended 44E:** No

**Filed 66A:** No

**Currently 66A:** No

**Filed No Basis:** No

**Currently No Basis:** No

## Current Owner(s) Information

**Owner Name:** Duke University

**Owner Address:** DUMC-3024  
Durham, NORTH CAROLINA UNITED STATES 27710

**Legal Entity Type:** NONPROFIT CORPORATION

**State or Country Where Organized:** NORTH CAROLINA

## Attorney/Correspondence Information

### Attorney of Record

**Attorney Name:** Susan Freya Olive

**Docket Number:** DUKU0308

**Attorney Primary Email Address:** [emailboxtm@oliveandolive.com](mailto:emailboxtm@oliveandolive.com)

**Attorney Email Authorized:** Yes

### Correspondent

**Correspondent Name/Address:** Susan Freya Olive  
OLIVE & OLIVE, P.A.  
500 MEMORIAL ST.  
POST OFFICE BOX 2049  
DURHAM, NORTH CAROLINA UNITED STATES 27702

**Phone:** 919-683-5514

**Fax:** 919-688-3781

**Correspondent e-mail:** [emailboxtm@oliveandolive.com](mailto:emailboxtm@oliveandolive.com)

**Correspondent e-mail Authorized:** Yes

### Domestic Representative - Not Found

## Prosecution History

Date	Description	Proceeding Number
Oct. 09, 2007	REGISTERED AND RENEWED (FIRST RENEWAL - 10 YRS)	61619
Oct. 09, 2007	REGISTERED - SEC. 8 (10-YR) ACCEPTED/SEC. 9 GRANTED	
Sep. 19, 2007	ASSIGNED TO PARALEGAL	61619
Sep. 07, 2007	REGISTERED - COMBINED SECTION 8 (10-YR) & SEC. 9 FILED	
Sep. 07, 2007	TEAS SECTION 8 & 9 RECEIVED	
Aug. 15, 2007	CASE FILE IN TICRS	
Jun. 24, 2004	REGISTERED - SEC. 8 (6-YR) ACCEPTED & SEC. 15 ACK.	
Mar. 24, 2004	REGISTERED - SEC. 8 (6-YR) & SEC. 15 FILED	
Jun. 16, 1998	REGISTERED-PRINCIPAL REGISTER	
Apr. 01, 1998	ALLOWED PRINCIPAL REGISTER - SOU ACCEPTED	
Mar. 24, 1998	STATEMENT OF USE PROCESSING COMPLETE	
Dec. 17, 1997	USE AMENDMENT FILED	
Mar. 24, 1998	DIVISIONAL PROCESSING COMPLETE	
Jul. 15, 1997	EXTENSION 1 GRANTED	

Jun. 17, 1997 EXTENSION 1 FILED  
Dec. 17, 1996 NOA MAILED - SOU REQUIRED FROM APPLICANT  
Sep. 24, 1996 PUBLISHED FOR OPPOSITION  
Aug. 23, 1996 NOTICE OF PUBLICATION  
Jul. 18, 1996 APPROVED FOR PUB - PRINCIPAL REGISTER  
Jul. 09, 1996 EXAMINER'S AMENDMENT MAILED

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## Maintenance Filings or Post Registration Information

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**Affidavit of Continued Use:** Section 8 - Accepted

**Affidavit of Incontestability:** Section 15 - Accepted

**Renewal Date:** Jun. 16, 2008

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## TM Staff and Location Information

---

TM Staff Information - None

File Location

**Current Location:** POST REGISTRATION

**Date in Location:** Oct. 09, 2007

# Notice of Opposition

Exhibit 4:  
TSDR website printout of Reg. No. 2,206,001

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**CAMERON CRAZIE**

Generated on: This page was generated by TSDR on 2016-04-11 09:26:31 EDT

Mark: CAMERON CRAZIE

US Serial Number: 75051074

Application Filing Date: Jan. 31, 1996

US Registration Number: 2206001

Registration Date: Nov. 24, 1998

Register: Principal

Mark Type: Trademark

Status: The registration has been renewed.

Status Date: Feb. 29, 2008

Publication Date: Sep. 24, 1996

Notice of Allowance Date: Dec. 17, 1996

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## Mark Information

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Mark Literal Elements: CAMERON CRAZIE

Standard Character Claim: No

Mark Drawing Type: 1 - TYPESET WORD(S) /LETTER(S) /NUMBER(S)

---

## Related Properties Information

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Parent Of: 75977192

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## Goods and Services

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Note: The following symbols indicate that the registrant/owner has amended the goods/services:

- Brackets [...] indicate deleted goods/services;
- Double parenthesis ((...)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and
- Asterisks \*..\* identify additional (new) wording in the goods/services.

For: decals

International Class(es): 016 - Primary Class

U.S Class(es): 002, 005, 022, 023, 029, 037, 038, 050

Class Status: ACTIVE

Basis: 1(a)

First Use: Aug. 21, 1997

Use in Commerce: Aug. 21, 1997

For: cups, and mugs not made of precious metal

International Class(es): 021 - Primary Class

U.S Class(es): 002, 013, 023, 029, 030, 033, 040, 050

Class Status: ACTIVE

Basis: 1(a)

First Use: May 13, 1997

Use in Commerce: May 13, 1997

For: pennants



**International Class(es):** 024 - Primary Class

**U.S Class(es):** 042, 050

**Class Status:** ACTIVE

**Basis:** 1(a)

**First Use:** May 16, 1997

**Use in Commerce:** May 16, 1997

## Basis Information (Case Level)

<b>Filed Use:</b> No	<b>Currently Use:</b> Yes	<b>Amended Use:</b> No
<b>Filed ITU:</b> Yes	<b>Currently ITU:</b> No	<b>Amended ITU:</b> No
<b>Filed 44D:</b> No	<b>Currently 44D:</b> No	<b>Amended 44D:</b> No
<b>Filed 44E:</b> No	<b>Currently 44E:</b> No	<b>Amended 44E:</b> No
<b>Filed 66A:</b> No	<b>Currently 66A:</b> No	
<b>Filed No Basis:</b> No	<b>Currently No Basis:</b> No	

## Current Owner(s) Information

**Owner Name:** Duke University

**Owner Address:** Durham, NORTH CAROLINA UNITED STATES 27706

**Legal Entity Type:** NONPROFIT CORPORATION

**State or Country Where Organized:** NORTH CAROLINA

## Attorney/Correspondence Information

### Attorney of Record

**Attorney Name:** Susan Freya Olive

**Docket Number:** DUKU0306

**Attorney Primary Email Address:** [emailboxtm@oliveandolive.com](mailto:emailboxtm@oliveandolive.com)

**Attorney Email Authorized:** Yes

### Correspondent

**Correspondent Name/Address:** Susan Freya Olive  
OLIVE & OLIVE, P.A.  
500 MEMORIAL ST.  
POST OFFICE BOX 2049  
DURHAM, NORTH CAROLINA UNITED STATES 27702-2049

**Phone:** 919-683-5514

**Fax:** 919-688-3781

**Correspondent e-mail:** [emailboxtm@oliveandolive.com](mailto:emailboxtm@oliveandolive.com)

**Correspondent e-mail Authorized:** Yes

### Domestic Representative - Not Found

## Prosecution History

Date	Description	Proceeding Number
Feb. 29, 2008	REGISTERED AND RENEWED (FIRST RENEWAL - 10 YRS)	68335
Feb. 29, 2008	REGISTERED - SEC. 8 (10-YR) ACCEPTED/SEC. 9 GRANTED	
Feb. 25, 2008	ASSIGNED TO PARALEGAL	68335
Feb. 22, 2008	TEAS SECTION 8 & 9 RECEIVED	
Aug. 01, 2007	CASE FILE IN TICRS	
Jun. 28, 2004	REGISTERED - SEC. 8 (6-YR) ACCEPTED & SEC. 15 ACK.	
May 24, 2004	REGISTERED - SEC. 8 (6-YR) & SEC. 15 FILED	
Nov. 24, 1998	REGISTERED-PRINCIPAL REGISTER	
Sep. 17, 1998	ALLOWED PRINCIPAL REGISTER - SOU ACCEPTED	
Aug. 10, 1998	CORRESPONDENCE RECEIVED IN LAW OFFICE	
Jul. 17, 1998	NON-FINAL ACTION MAILED	
Jul. 09, 1998	ASSIGNED TO EXAMINER	72152
Jul. 01, 1998	STATEMENT OF USE PROCESSING COMPLETE	
Jun. 17, 1998	USE AMENDMENT FILED	
Mar. 19, 1998	EXTENSION 2 GRANTED	

Dec. 17, 1997 EXTENSION 2 FILED  
Mar. 24, 1998 DIVISIONAL PROCESSING COMPLETE  
Dec. 17, 1997 DIVISIONAL REQUEST RECEIVED  
Jul. 15, 1997 EXTENSION 1 GRANTED  
Jun. 17, 1997 EXTENSION 1 FILED  
Dec. 17, 1996 NOA MAILED - SOU REQUIRED FROM APPLICANT  
Sep. 24, 1996 PUBLISHED FOR OPPOSITION  
Aug. 23, 1996 NOTICE OF PUBLICATION  
Jul. 18, 1996 APPROVED FOR PUB - PRINCIPAL REGISTER  
Jul. 09, 1996 EXAMINER'S AMENDMENT MAILED

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## Maintenance Filings or Post Registration Information

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**Affidavit of Continued Use:** Section 8 - Accepted

**Affidavit of Incontestability:** Section 15 - Accepted

**Renewal Date:** Nov. 24, 2008

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## TM Staff and Location Information

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TM Staff Information - None

File Location

**Current Location:** POST REGISTRATION

**Date in Location:** Feb. 29, 2008

# Notice of Opposition

Exhibit 5:

## **COMMON LAW MARKS**

## **CAMERON CRAZIE**

Used as a trademark to identify a wide range of products sold and licensed by Duke University, in many areas of endeavor, to men, women and children of all ages. For purposes of this proceeding, the products can generally be defined as consumer goods, and those asserted herein are the following:

- Personal grooming product (including, by way of example, nail files);
- Clothing for babies, children, men and women (including, by way of example, shirts);
- Beverageware and drinkware (including by way of example, mugs);
- Décor and ornaments
- Automobile and other vehicular decorative accessories (including by way of example banners, flags, key holders, and pennants);
- Sports memorabilia; university memorabilia; fanware; gift items intended to remind recipients of Duke University or some aspect of the services and entertainment provided by Duke University and its affiliates
- Publications
- And, all products listed in the trademark registrations recited in the Notice of Opposition and all products and services listed with respect to this mark in the text of the Notice of Opposition.

## **CAMERON CRAZIES**

An unincorporated association of fans of Duke University and its sports teams, who have as their common purpose the support of the sports teams

## **CAMERON CRAZIES**

Used as a trademark and as a service mark to identify a wide range of products sold and licensed by Duke University, and services provided by Duke University, in many areas of endeavor, to men, women and children of all ages. For purposes of this proceeding, the products can generally be defined as consumer goods, and the products and services asserted herein are the following:

- Personal grooming product (including, by way of example, nail files);
- Clothing for babies, children, men and women (including, by way of example, shirts);
- Beverageware and drinkware (including by way of example, mugs);
- Décor and ornaments
- Digital publications and media for enhancing the appearance of electronic device screens
- Automobile and other vehicular decorative accessories (including by way of example banners, flags, key holders, and pennants);
- Sports memorabilia; university memorabilia; fanware; gift items intended to remind recipients of Duke University or some aspect of the services and entertainment provided by Duke University and its affiliates
- Publications
- Entertainment services

- Providing facilities for entertainment
- And, all products listed in the trademark registrations recited in the Notice of Opposition and all products and services listed with respect to this mark in the text of the Notice of Opposition.

### **CAMERON INDOOR STADIUM**

Entertainment services in the nature of sporting events and university events; provision of information of interest to the University and its athletic programs

### **CRAZIES WHO CARE**

Services related to student fundraising and charitable giving

### **KRZYZEWSKI**

Coaching services; teaching services; entertainment services; education services; sports camp services; clothing; products for fans of Duke University and of Coach Krzyzewski; publications including books; provision of information concerning Duke University, sports, and leadership