

ESTTA Tracking number: **ESTTA1137416**

Filing date: **06/01/2021**

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	DC Comics
Granted to Date of previous extension	06/02/2021
Address	2900 WEST ALAMEDA AVENUE BURBANK, CA 91505 UNITED STATES
Attorney information	JAMES D. WEINBERGER FROSS ZELNICK LEHRMAN & ZISSU, P.C. 151 WEST 42ND STREET, 17TH FLOOR NEW YORK, NY 10036 UNITED STATES Primary Email: jweinberger@fzlz.com Secondary Email(s): dnuzzaci@fzlz.com (212) 813-5900
Docket Number	DCC 2107432

Applicant Information

Application No.	90121666	Publication date	02/02/2021
Opposition Filing Date	06/01/2021	Opposition Period Ends	06/02/2021
Applicant	Blind Dog Industries, LLC 806 WASHINGTON AVE, APT B COLUMBIA, MO 65201 UNITED STATES		


Goods/Services Affected by Opposition


Class 041. First Use: 2018/12/05 First Use In Commerce: 2019/01/05 All goods and services in the class are opposed, namely: Arranging and conducting athletic competitions; Entertainment services, namely, arranging and conducting of competitions in the field of amateur women's wrestling; Organization, arranging and conducting of sports competitions; Organizing and conducting athletic competitions and games in the field of amateur women's wrestling; Organizing, conducting and operating amateur women's wrestling tournaments

Grounds for Opposition

Priority and likelihood of confusion	Trademark Act Section 2(d)
Dilution by blurring	Trademark Act Sections 2 and 43(c)

Marks Cited by Opposer as Basis for Opposition

U.S. Registration No.	820334	Application Date	02/02/1966
Registration Date	12/13/1966	Foreign Priority Date	NONE
Word Mark	WONDER WOMAN		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 016. First use: First Use: 1965/09/07 First Use In Commerce: 1965/09/07 CARTOONS PUBLISHED IN A SERIES, AND COMIC MAGAZINES		


U.S. Registration No.	395739	Application Date	11/24/1941
Registration Date	06/09/1942	Foreign Priority Date	NONE
Word Mark	WONDER WOMAN		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 016. First use: First Use: 1941/10/16 First Use In Commerce: 1941/10/16 Comic Magazine		

U.S. Registration No.	1388425	Application Date	09/13/1985
Registration Date	04/01/1986	Foreign Priority Date	NONE
Word Mark	WONDER WOMAN		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 028. First use: First Use: 1974/07/31 First Use In Commerce: 1974/07/31 TOYS, NAMELY TOY DOLLS		

U.S. Registration No.	1221717	Application Date	05/10/1982
Registration Date	12/28/1982	Foreign Priority Date	NONE

Word Mark	WONDER WOMAN
Design Mark	
Description of Mark	NONE
Goods/Services	Class 016. First use: First Use: 1941/10/10 First Use In Commerce: 1941/10/10 Comic Magazines


U.S. Registration No.	5324415	Application Date	10/25/2015
Registration Date	10/31/2017	Foreign Priority Date	NONE

Word Mark	WONDER WOMAN
Design Mark	

Description of Mark	NONE
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Goods/Services	Class 025. First use: First Use: 1998/00/00 First Use In Commerce: 1998/00/00 Clothing for men, women and children, namely, shirts, t-shirts, sweatshirts, jogging suits, trousers, pants, shorts, tank tops, rainwear, cloth baby bibs, skirts, blouses, dresses, suspenders, sweaters, jackets, coats, raincoats, ties, robes, hats, caps, sunvisors, gloves, belts, scarves, sleepwear, pajamas, lingerie, underwear, boots, shoes, sneakers, sandals, socks, booties, slipper socks, swimwear and masquerade and Halloween costumes and masks sold in connection therewith
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U.S. Registration No.	5408174	Application Date	05/07/2016
Registration Date	02/20/2018	Foreign Priority Date	NONE


Word Mark	WONDER WOMAN
Design Mark	

Description of Mark	NONE
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Goods/Services	Class 014. First use: First Use: 2004/06/01 First Use In Commerce: 2004/06/01
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	Clocks; watches; jewelry; bracelets; charms; earrings; lapel pins; necklaces; ornamental pins; rings; beads for making jewelry; leather jewelry		
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U.S. Registration No.	5408175	Application Date	05/07/2016
Registration Date	02/20/2018	Foreign Priority Date	NONE
Word Mark	WONDER WOMAN		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 018. First use: First Use: 2009/01/15 First Use In Commerce: 2009/01/15 Backpacks, book bags, messenger bags, tote bags, knapsacks, leather shopping bags, textile shopping bags, re-useable shopping bags; umbrellas; wallets; accessories made of leather, namely, handbags		

U.S. Registration No.	5413518	Application Date	05/07/2016
Registration Date	02/27/2018	Foreign Priority Date	NONE
Word Mark	WONDER WOMAN		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 032. First use: First Use: 2016/02/01 First Use In Commerce: 2016/02/01 non-alcoholic beverages, namely, soft drinks		


U.S. Registration No.	5536272	Application Date	05/07/2016
Registration Date	08/07/2018	Foreign Priority Date	NONE
Word Mark	WONDER WOMAN		


Design Mark	WONDER WOMAN
Description of Mark	NONE
Goods/Services	Class 009. First use: First Use: 1975/00/00 First Use In Commerce: 1993/00/00 Motion picture films featuring comedy, drama, action, adventure and animation, and motion picture films for broadcast on television featuring comedy, drama, action, adventure and animation; digital versatile discs featuring music, comedy, drama, action, adventure, and animation; stereo headphones; mouse pads; sunglasses; computer game software for use on mobile and cellular phones; computer game software for gaming machines including slot machines; computer software and firmware for playing games of chance on any computerized platform, including video based slot machines, reel based slot machines; downloadable electronic publications in the nature of books featuring characters from animated, action adventure, comedy and/or drama features, comic books, children's books; cellular telephone accessories, namely, cellular telephone covers and cellular telephone face covers; encoded magnetic cards, namely, debit-cards; and decorative magnets

U.S. Registration No.	5536273	Application Date	05/07/2016
Registration Date	08/07/2018	Foreign Priority Date	NONE


Word Mark	WONDER WOMAN
Design Mark	WONDER WOMAN
Description of Mark	NONE
Goods/Services	Class 016. First use: First Use: 1941/10/10 First Use In Commerce: 1941/10/10 Printed matter and paper goods, namely, books featuring characters from animated, action adventure, comedy and drama features, comic books, children's books, coloring books, children's activity books; envelopes, notebooks, diaries, note cards, greeting cards; pens; decals; posters; book marks, calendars; paper party decorations, namely, paper napkins, invitations; printed patterns for costumes


U.S. Registration	5649663	Application Date	05/07/2016
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No.			
Registration Date	01/08/2019	Foreign Priority Date	NONE
Word Mark	WONDER WOMAN		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 021. First use: First Use: 2010/06/00 First Use In Commerce: 2010/06/00 Glass and ceramic goods, namely, bowls, plates, coffee cups, and cups; beverage glassware, namely, drinking glasses; cookie jars; toothbrushes; household serving utensils, namely, spatulas; thermal insulated containers for food or beverages; cookie cutters; water bottles sold empty; and dinnerware, namely, paper plates		

U.S. Registration No.	5649664	Application Date	05/07/2016
Registration Date	01/08/2019	Foreign Priority Date	NONE
Word Mark	WONDER WOMAN		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 028. First use: First Use: 1974/07/31 First Use In Commerce: 1974/07/31 Toys, including games and playthings, namely, action figures and accessories therefor; playsets for action figures; plush toys; balloons; ride-on toys; playing-cards; toy vehicles; dolls; game equipment sold as a unit for playing a board game; stand alone video output game machines; slot machines; gaming equipment, namely, slot machines with or without video output; jigsaw and manipulative puzzles; swimming floats for recreational use; toy sets in the nature of toy construction sets; Christmas tree ornaments; Halloween costume masks		

U.S. Registration No.	5656164	Application Date	05/07/2016
Registration Date	01/15/2019	Foreign Priority	NONE

		Date	
Word Mark	WONDER WOMAN		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 024. First use: First Use: 2010/12/00 First Use In Commerce: 2010/12/00 Bath linens, namely, bath towels; bed linens, namely, bed blankets, bed sheets, pillow cases, comforters, pillow shams; cotton and polyester fabric; kitchen linens, namely, dish cloths, kitchen towels		

U.S. Registration No.	5680985	Application Date	05/07/2016
Registration Date	02/19/2019	Foreign Priority Date	NONE
Word Mark	WONDER WOMAN		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 005. First use: First Use: 2018/04/00 First Use In Commerce: 2018/04/00 Adhesive plastic bandages for skin wounds		

U.S. Registration No.	5680986	Application Date	05/07/2016
Registration Date	02/19/2019	Foreign Priority Date	NONE
Word Mark	WONDER WOMAN		

Design Mark	WONDER WOMAN
Description of Mark	NONE
Goods/Services	Class 020. First use: First Use: 2002/00/00 First Use In Commerce: 2002/00/00 Sleeping bags, plastic cake decorations, non-metal and non-leather key chains, picture frames, pillows

U.S. Registration No.	6113794	Application Date	05/07/2016
Registration Date	07/28/2020	Foreign Priority Date	NONE


Word Mark	WONDER WOMAN
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Design Mark	WONDER WOMAN
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Description of Mark	NONE
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Goods/Services	Class 041. First use: First Use: 1975/11/07 First Use In Commerce: 1975/11/07 Entertainment services, namely, providing online video games, providing online computer games, providing temporary use of non-downloadable video games; entertainment services, namely, video and computer game services provided on-line from a computer network; entertainment services in the nature of live-action, comedy, drama, animated, and reality television series; production of live-action, comedy, drama, animated and reality television series; entertainment services, namely, distribution and display of live-action, comedy, drama and animated motion picture theatrical films; production of live-action, comedy, drama and animated motion picture theatrical films; live action theatrical performances; entertainment services, namely, displaying a series of pre-recorded animated theatrical performances; providing information via an electronic global computer network in the field of entertainment relating specifically to games, music, movies, and television; providing non-downloadable film clips in the field of television and motion pictures, photographs and other multimedia materials in the nature of pre-recorded music, ringtones, screensavers, emojis, desktop wallpaper, movie trailers, and still images from television shows and motion pictures, for entertainment purposes via a web site; providing news about current events and entertainment, and information related to education and cultural events, via a global computer network; and providing information in the field of entertainment
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	<p>via an electronic global communications network; entertainment services, namely, the provision of continuing programs featuring live-action, comedy, drama and animation delivered via an electronic global communications network; production of live-action, comedy, drama and animated motion picturefilms for distribution via a global computer network; providing an online computer game that may be accessed by a telecommunications network; and electronic publishing services, namely, publication of text and graphic works of others on-line featuring articles, novelizations, scripts, comic books, strategy guides, photographs and visual materials; non-downloadable electronic publications in the nature of books featuring characters from animated, action adventure, comedy and drama features, comic books, children's books, strategy guides for computer games, video games and board games, magazines featuring characters from animated, action adventure, comedy and drama features, coloring books, children's activity books and magazines in the field of entertainment; amusement parks services; provision of amusement park rides; entertainment services, namely, presentation of live show performances; entertainment services, namely, displaying a series of pre-recorded show performance and movies; entertainment and recreation information; electronic game services provided via a global computer network; providing of casino and gaming facilities; entertainment services in the nature of organizing film exhibitions and film distribution</p>
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U.S. Registration No.	6130732	Application Date	12/20/2017
Registration Date	08/18/2020	Foreign Priority Date	NONE
Word Mark	WONDER WOMAN		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 028. First use: First Use: 2014/09/30 First Use In Commerce: 2014/09/30 Gaming machines, namely, devices which accept a wager; Reconfigurable casino and lottery gaming equipment, namely, gaming machines and operational computer games software therefor sold as a unit		

U.S. Registration No.	6130733	Application Date	12/20/2017
Registration Date	08/18/2020	Foreign Priority Date	NONE
Word Mark	WONDER WOMAN		

Design Mark	<h1>WONDER WOMAN</h1>		
Description of Mark	NONE		
Goods/Services	Class 041. First use: First Use: 2014/09/30 First Use In Commerce: 2014/09/30 Entertainment services, namely, casino gaming; Electronic casino gaming services		

U.S. Registration No.	6216420	Application Date	05/19/2020
Registration Date	12/08/2020	Foreign Priority Date	NONE
Word Mark	WONDER WOMAN		
Design Mark	<h1>WONDER WOMAN</h1>		
Description of Mark	NONE		
Goods/Services	Class 030. First use: First Use: 2019/00/00 First Use In Commerce: 2019/00/00 Frozen confections; Tortilla chips		

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Signature	/s/ James D. Weinberger
Name	James D. Weinberger
Date	06/01/2021

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

DC COMICS,

Opposer,

-against-

BLIND DOG INDUSTRIES, LLC,

Applicant.

NOTICE OF OPPOSITION

DC Comics (“Opposer”), a New York partnership located at 2900 West Alameda Avenue, Burbank, California 91505, believes that it will be damaged by the issuance of a registration to Blind Dog Industries, LLC (“Applicant”) for the mark WONDER WOMAN WRESTLING TOURNAMENT as applied for in U.S. Trademark Application Serial No. 90121666 (the “Application”) and therefore opposes the same. As grounds for the opposition, Opposer alleges as follows:

1. Opposer along with its predecessors-in-interest (collectively, “DC Comics”) is the publisher of comic books and magazines featuring comic characters and stories, including the world-famous character Wonder Woman. DC Comics is among the most well-known and successful publishers of comic magazines in the world.

2. Over the many years since the Wonder Woman character was first introduced in 1941, DC Comics has focused an enormous amount of attention and effort to develop the Wonder Woman mythos, including the character, her associates, her world, and other indicia associated with her. Throughout the period of Wonder Woman’s existence, DC Comics has invested a vast amount of creative energy and resources to continually update and improve the

Wonder Woman property to keep the character and her adventures timely and fresh in the public's mind. Opposer's efforts in this regard have led to a vast array of literary works, television series, and feature films, which fully explore in great depth Wonder Woman herself and the fictional world inhabited by her. Due to Opposer's extraordinary nurturing of the Wonder Woman mythos, the character and her universe have captured the popular imagination, and it is beyond dispute that today the Wonder Woman lore is one of a rarified group of legends known and loved throughout the world.

3. Because of DC Comics' shepherding and careful development of not just the Wonder Woman character, but also her universe and the people, places, and things that populate that universe, Wonder Woman has become associated with certain names, symbols, and indicia which, in the public mind, are inextricably linked with the Wonder Woman character and which function as trademarks, both for entertainment works featuring Wonder Woman and also for various goods and services for which Opposer has licensed others to use these marks. Among these indicia are the well-known WONDER WOMAN mark as well as her likeness, which includes dark hair, a red cape, a red and gold corset, a blue skirt, and a gold tiara (collectively, "Opposer's Marks").

4. Opposer is the owner of all right, title, and interest in and to Opposer's Marks in connection with a vast array of goods and services based on first use in commerce prior to any date upon which Applicant can rely.



5. Moreover, the broad reach and deep emotional impact of entertainment products, specifically those bearing Opposer's Marks, create unparalleled goodwill in the names, characters, and symbols from those products and have generated a robust licensing business in virtually limitless categories of goods and services. Consumers today have come to expect that

when elements from entertainment products appear on or in connection with goods or services, such uses are associated with and licensed by the rights holder. Accordingly, consistent with consumers' expectations, Opposer has also licensed the rights for various goods and services bearing Opposer's Marks including but not limited to entertainment products, such as motion pictures and television programs, as well as a vast array of consumer products, such as clothing, shoes, jewelry, watches, accessories, toys and figurines, costumes, cosmetics and makeup, posters and stationery, drinkware, kitchenware, and masks.

6. As a result of Opposer's reputation, use, enormous sales success, and significant investment in advertising, Opposer's Marks have developed secondary meaning and significance in the minds of the public and have become strong trademarks in identifying Opposer's goods and services exclusively. As such, Opposer's Marks represent enormous goodwill and are an extremely valuable asset to Opposer.

7. As a result of Opposer's reputation, use, substantial sales success, inestimable popularity, and significant investment in advertising, Opposer's Marks have become famous trademarks and became famous prior to any date upon which Applicant can rely.

8. Opposer owns numerous U.S. trademark registrations for Opposer's Marks in connection with a wide array of goods and services including, but not limited to, the following:

Mark	Reg. No.	Reg. Date	Goods/Services
	820334*	12/13/1966	IC 16: Cartoons published in a series, and comic magazines
	395739	6/9/1942	IC 16: Comic magazines
WONDER WOMAN	1388425*	4/1/1986	IC 28: Toys, namely toy dolls
WONDER WOMAN	1221717*	12/28/1982	IC 16: Comic magazines

Mark	Reg. No.	Reg. Date	Goods/Services
WONDER WOMAN	5324415	10/31/2017	IC 25: Clothing for men, women and children, namely, shirts, t-shirts, sweatshirts, jogging suits, trousers, pants, shorts, tank tops, rainwear, cloth baby bibs, skirts, blouses, dresses, suspenders, sweaters, jackets, coats, raincoats, ties, robes, hats, caps, sunvisors, gloves, belts, scarves, sleepwear, pajamas, lingerie, underwear, boots, shoes, sneakers, sandals, socks, booties, slipper socks, swimwear and masquerade and Halloween costumes and masks sold in connection therewith
WONDER WOMAN	5408174	2/20/2018	IC 14: Clocks; watches; jewelry; bracelets; charms; earrings; lapel pins; necklaces; ornamental pins; rings; beads for making jewelry; leather jewelry
WONDER WOMAN	5408175	2/20/2018	IC 18: Backpacks, book bags, messenger bags, tote bags, knapsacks, leather shopping bags, textile shopping bags, reusable shopping bags; umbrellas; wallets; accessories made of leather, namely, handbags
WONDER WOMAN	5413518	2/27/2018	IC 32: Non-alcoholic beverages, namely, soft drinks
WONDER WOMAN	5536272	8/7/2018	IC 9: Motion picture films featuring comedy, drama, action, adventure and animation, and motion picture films for broadcast on television featuring comedy, drama, action, adventure and animation; digital versatile discs featuring music, comedy, drama, action, adventure, and animation; stereo headphones; mouse pads; sunglasses; computer game software for use on mobile and cellular phones; computer game software for gaming machines including slot machines; computer software and firmware for playing games of chance on any computerized platform, including video based slot machines, reel based slot machines; downloadable electronic

Mark	Reg. No.	Reg. Date	Goods/Services
			publications in the nature of books featuring characters from animated, action adventure, comedy and/or drama features, comic books, children's books; cellular telephone accessories, namely, cellular telephone covers and cellular telephone face covers; encoded magnetic cards, namely, debit cards; and decorative magnets
WONDER WOMAN	5536273	8/7/2018	IC 16: Printed matter and paper goods, namely, books featuring characters from animated, action adventure, comedy and drama features, comic books, children's books, coloring books, children's activity books; envelopes, notebooks, diaries, note cards, greeting cards; pens; decals; posters; book marks, calendars; paper party decorations, namely, paper napkins, invitations; printed patterns for costumes
WONDER WOMAN	5649663	1/8/2019	IC 21: Glass and ceramic goods, namely, bowls, plates, coffee cups, and cups; beverage glassware, namely, drinking glasses; cookie jars; toothbrushes; household serving utensils, namely, spatulas; thermal insulated containers for food or beverages; cookie cutters; water bottles sold empty; and dinnerware, namely, paper plates
WONDER WOMAN	5649664	1/8/2019	IC 28: Toys, including games and playthings, namely, action figures and accessories therefor; playsets for action figures; plush toys; balloons; ride-on toys; playing cards; toy vehicles; dolls; game equipment sold as a unit for playing a board game; stand alone video output game machines; slot machines; gaming equipment, namely, slot machines with or without video output; jigsaw and manipulative puzzles; swimming floats for recreational use; toy sets in the nature of toy construction sets; Christmas tree ornaments; Halloween costume masks

Mark	Reg. No.	Reg. Date	Goods/Services
WONDER WOMAN	5656164	1/15/2019	IC 24: Bath linens, namely, bath towels; bed linens, namely, bed blankets, bed sheets, pillow cases, comforters, pillow shams; cotton and polyester fabric; kitchen linens, namely, dish cloths, kitchen towels
WONDER WOMAN	5680985	2/19/2019	IC 5: Adhesive plastic bandages for skin wounds
WONDER WOMAN	5680986	2/19/2019	IC 20: Sleeping bags, plastic cake decorations, non-metal and non-leather key chains, picture frames, pillows
WONDER WOMAN	6113794	7/28/2020	IC 41: Entertainment services, namely, providing online video games, providing online computer games, providing temporary use of non-downloadable video games; entertainment services, namely, video and computer game services provided on-line from a computer network; entertainment services in the nature of live-action, comedy, drama, animated, and reality television series; production of live-action, comedy, drama, animated and reality television series; entertainment services, namely, distribution and display of live-action, comedy, drama and animated motion picture theatrical films; production of live-action, comedy, drama and animated motion picture theatrical films; live action theatrical performances; entertainment services, namely, displaying a series of pre-recorded animated theatrical performances; providing information via an electronic global computer network in the field of entertainment relating specifically to games, music, movies, and television; providing non-downloadable film clips in the field of television and motion pictures, photographs and other multimedia materials in the nature of pre-recorded music, ringtones, screensavers, emojis, desktop wallpaper, movie trailers, and still images from television shows and motion pictures, for entertainment purposes via a web site; providing news

Mark	Reg. No.	Reg. Date	Goods/Services
			<p>about current events and entertainment, and information related to education and cultural events, via a global computer network; and providing information in the field of entertainment via an electronic global communications network; entertainment services, namely, the provision of continuing programs featuring live-action, comedy, drama and animation delivered via an electronic global communications network; production of live-action, comedy, drama and animated motion picture films for distribution via a global computer network; providing an online computer game that may be accessed by a telecommunications network; and electronic publishing services, namely, publication of text and graphic works of others on-line featuring articles, novelizations, scripts, comic books, strategy guides, photographs and visual materials; non-downloadable electronic publications in the nature of books featuring characters from animated, action adventure, comedy and drama features, comic books, children's books, strategy guides for computer games, video games and board games, magazines featuring characters from animated, action adventure, comedy and drama features, coloring books, children's activity books and magazines in the field of entertainment; amusement parks services; provision of amusement park rides; entertainment services, namely, presentation of live show performances; entertainment services, namely, displaying a series of pre-recorded show performance and movies; entertainment and recreation information; electronic game services provided via a global computer network; providing of casino and gaming facilities; entertainment services in the nature of</p>

Mark	Reg. No.	Reg. Date	Goods/Services
			organizing film exhibitions and film distribution
WONDER WOMAN	6130732	8/18/2020	IC 28: Gaming machines, namely, devices which accept a wager; Reconfigurable casino and lottery gaming equipment, namely, gaming machines and operational computer games software therefor sold as a unit
WONDER WOMAN	6130733	8/18/2020	IC 41: Entertainment services, namely, casino gaming; Electronic casino gaming services
WONDER WOMAN	6216420	12/8/2020	IC 30: Frozen confections, tortilla chips

9. All of the registrations for Opposer’s Marks relied upon herein are valid, subsisting, and in full effect and serve as *prima facie* evidence of the validity of the mark and of Opposer’s exclusive right to use the mark in connection with the goods and services identified therein, pursuant to Section 33(a) of the Lanham Act, 15 U.S.C. § 1115(a). Additionally, the registrations marked with an asterisk (*) have become incontestable under Section 15 of the Lanham Act, 15 U.S.C. § 1065, and therefore serve as conclusive proof of Opposer’s exclusive right to use the mark in connection with the goods and services identified therein, as provided by Section 33(b) of the Lanham Act, 15 U.S.C. § 1115(b). Opposer’s trademark registrations also place others, including Applicant, on constructive notice of its rights. *See* 15 U.S.C. § 1072.

10. Upon information and belief, Applicant is a Missouri limited liability company with an address of 806 Washington Avenue, Apartment B, Columbia, Missouri 65201.

11. On August 18, 2020, Applicant filed the Application to register the mark WONDER WOMAN WRESTLING TOURNAMENT (“Applicant’s Mark”) in International Class 41 for use in connection with “Arranging and conducting athletic competitions; Entertainment services, namely, arranging and conducting of competitions in the field of amateur

women's wrestling; Organization, arranging and conducting of sports competitions; Organizing and conducting athletic competitions and games in the field of amateur women's wrestling; Organizing, conducting and operating amateur women's wrestling tournaments." The Application was filed pursuant to Section 1(a) of the Lanham Act, 15 U.S.C. § 1051(a), and claims a first use in commerce date of January 5, 2019.

12. Opposer's Marks have been used continuously and/or registered by Opposer since a date prior to any date on which Applicant can rely.

13. Upon information and belief, prior to any date on which Applicant can rely, Applicant was on actual notice of Opposer's prior rights in and to Opposer's Marks.

14. The earliest date upon which Applicant can rely is long after the use, registration, and acquisition of rights in Opposer's Marks by Opposer or its predecessors-in-interest. As such, Opposer's rights in Opposer's Marks are prior and superior to any rights Applicant may claim in Applicant's Mark. The registration of Applicant's Mark is inconsistent with Opposer's prior rights and statutory grant of exclusivity of use.

15. Applicant is not connected to Opposer in any way, and Applicant has not been authorized by Opposer to register or use Applicant's Mark.

16. Applicant's Mark is highly similar to Opposer's Marks in sight, sound, and commercial impression, including because Applicant's Mark incorporates in its entirety Opposer's WONDER WOMAN mark.

17. Applicant's services to be offered under Applicant's Mark are related to the goods and services offered under Opposer's Marks and, upon information and belief, will be sold to the same customers and through the same trade channels as goods and services bearing Opposer's Marks.

18. Based on the strength and fame of Opposer's Marks, the similarity of the parties' marks, and the relatedness of the parties' goods and services, consumers are likely to be deceived into falsely believing that the services to be offered by Applicant under Applicant's Mark originate from or are otherwise associated with or endorsed by Opposer, or that there is some relationship between Applicant and Opposer or the services of Applicant and the goods and services of Opposer, all to Opposer's injury and harm.

19. Thus, registration of Applicant's Mark as applied for in the Application is likely to cause confusion, cause mistake, or deceive the public into the false belief that the services to be offered by Applicant under Applicant's Mark come from or are otherwise sponsored by or connected with Opposer, in violation of Section 2(d) of the Lanham Act, 15 U.S.C. § 1052(d).

20. Moreover, Opposer's Marks are famous for goods and services relating to entertainment and had become famous long before the earliest priority date upon which Applicant can rely. Because Opposer's Marks have become famous, Applicant's use and registration of Applicant's Mark will damage Opposer by trading on the enormous goodwill associated with such marks and diluting their distinctiveness.

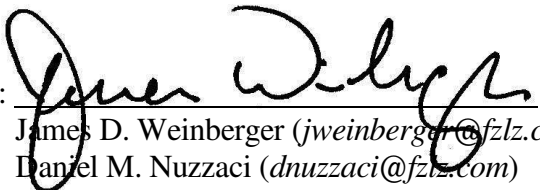
21. Thus, Applicant's use and registration of Applicant's Mark in connection with the services identified in the Application are likely to cause dilution by blurring of the famous Opposer's Marks, in violation of Sections 13(a) and 43(c) of the Lanham Act, 15 U.S.C. §§ 1063(a), 1125(c).

22. By reason of the foregoing, Opposer is likely to be harmed by the registration of the Application for Applicant's Mark.

THEREFORE, it is respectfully requested that this Opposition be sustained and that registration of Applicant's Mark as applied for in the Application be refused in its entirety.

Dated: New York, New York
June 1, 2021

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