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Filing date: **07/27/2018**

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

Proceeding	92068367
Party	Defendant Kriss International SA
Correspondence Address	KRISS INTERNATIONAL SA CHEMIN DE LA VUARPILLIÃ#RE 35 NYON, CH-1260 SWITZERLAND
Submission	Motion to Suspend for Civil Action
Filer's Name	Ray K. Harris
Filer's email	ip@fclaw.com, rharris@fclaw.com, ssmith@fclaw.com
Signature	/Ray K. Harris/
Date	07/27/2018
Attachments	7-27-2018 filed Request to Suspend Proceedings in Cancellation No. 92068367.pdf(4596303 bytes)

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

Defiance Machine, Inc.,	)	
	)	Cancellation No.: 92068367
Petitioner,	)	
	)	Registration No.: 4,516,747
v.	)	
	)	REQUEST TO SUSPEND PROCEEDINGS
	)	
Kriss International SA,	)	
	)	
Respondent.	)	

Pursuant to 37 CFR § 2.117(a), Kriss International SA and Kriss Systems SA, as assignee of US Registration No. 4,516,747, request that these proceedings before the Board be suspended and give notice to the Board of a civil action, brought in the United States District Court for the District of Delaware, by Kriss USA Inc. against Defiance Machine, Inc. (Petitioner in this action). Exhibit A is a copy of the Delaware Complaint.

Kriss International SA has assigned its rights in US Registration No. 4,516,747 for the DEFIANCE trademark to Kriss Systems SA, which assignment was filed with WIPO as of July 21, 2018. Kriss USA Inc. is the exclusive licensee of the DEFIANCE trademark in the United States and has the right to enforce the DEFIANCE trademark in the United States.

In the Delaware Complaint, Kriss USA Inc. seeks declaratory judgment regarding rights in the DEFIANCE mark and asserts trademark infringement and unfair competition against Defiance Machine, Inc. (and related claims). These claims have a bearing on this Cancellation action. Consequently, these proceedings should be suspended until termination of the civil action.

Dated: July 27, 2018

Respectfully submitted,

s/ Ray K. Harris___
Ray K. Harris
Stacie K. Smith
Fennemore Craig
2394 E. Camelback Road; Ste. 600
Phoenix, AZ 85016

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Request to Suspend Proceedings was served on Petitioner's counsel via email and regular mail:

Jeffrey A. Nelson
Cairncross & Hempelmann
524 2nd Avenue
Suite 500
Seattle, WA 98104
jnelson@cairncross.com

Dated this 27th day of July, 2018.

s/ Ray K. Harris

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

KRISS USA, INC.,	)	
	)	
Plaintiff,	)	
	)	C.A. No.
v.	)	
DEFIANCE MACHINE, INC.,	)	JURY TRIAL DEMANDED
	)	
Defendant.	)	

COMPLAINT

Plaintiff Kriss USA, Inc., ("Plaintiff" or "Kriss"), brings this action against Defiance Machine, Inc. ("Defendant" or "DMI"). Kriss alleges as follows, upon actual knowledge with respect to itself and its own acts, and upon information and belief as to all other matters:

PARTIES

1. Plaintiff Kriss USA, Inc. is a Delaware corporation having its principal place of business in Virginia. Kriss is the exclusive licensee in the United States for the DEFIANCE trademark owned by Kriss Systems SA, a Swiss company. Kriss has the right to enforce the DEFIANCE trademark in the U.S.

2. Upon information and belief, Defendant Defiance Machine, Inc. is a Delaware corporation having its principal place of business in Montana.

NATURE OF ACTION

3. This action arises from Defendant's unauthorized and unlawful use and attempted registration of Kriss Systems SA's registered federal trademark DEFIANCE (the "DEFIANCE Mark"). Defendant DMI seeks to cancel registration of the DEFIANCE Mark and wrongfully asserts superior rights in the DEFIANCE Mark.

4. Plaintiff seeks declaratory, injunctive and monetary relief against Defendant for the following wrongful acts:

(a) trademark infringement in violation of 15 U.S.C. § 1051 *et seq*;

(b) unfair competition in violation of 15 U.S.C. §1125 and Delaware law; and

(c) unjust enrichment in violation of Delaware law.

JURISDICTION AND VENUE

5. This action arises under the Federal Trademark Act, 15 U.S.C. § 1051 *et seq.* and the Judicial Code 28 U.S.C. §§ 2201 and 2202.

6. This Court has jurisdiction over the subject matter of this claim pursuant to federal question jurisdiction, 28 U.S.C. §§ 1331, 1338(a) & (b), the Lanham Act, 15 U.S.C. § 1121(a), and supplemental jurisdiction, 28 U.S.C. §1367.

7. Personal jurisdiction exists over Defendant in this District as Defendant resides in this District and caused consumer confusion and loss of its goodwill to occur in this District as alleged herein.

8. The actual controversy requirement of the Declaratory Judgment Act (28 U.S.C. § 2201(a)) is satisfied because the dispute is definite and concrete, touches the legal relations of parties having adverse legal interests, is real and substantial, and admits of specific relief through a decree of a conclusive character. The facts alleged show a substantial controversy of sufficient immediacy and reality to warrant the issuance of a declaratory judgment.

9. Venue is proper in this District under 28 U.S.C. § 1391(b)(1) and (c), because Defendant resides within the jurisdiction of this Court by virtue of being a Delaware corporation.

PLAINTIFF'S MARK

10. Kriss Systems SA, a Swiss company, is the owner of the DEFIANCE Mark, U.S. Reg. No. 4,516,747, as the successor by assignment to the rights of Kriss International SA, the original registrant in the United States of the DEFIANCE Mark. Plaintiff Kriss is the exclusive licensee in the United States and has the right to enforce the DEFIANCE Mark in the U.S.

11. The DEFIANCE Mark is registered for goods including: firearms, air pistols and sights, other than telescopic sights for firearms, in International Class 13.

12. The DEFIANCE Mark has been used by Plaintiff in commerce since December 9, 2010.

13. The U.S. registration of the DEFIANCE Mark is valid and enforceable. A copy of the registration certificate for the DEFIANCE Mark and the amendment thereto is attached as Exhibit 1.

14. The registration of the DEFIANCE Mark constitutes constructive notice of ownership. 15 U.S.C. § 1072.

15. Plaintiff has been using the DEFIANCE Mark in connection with the goods described in paragraph 11 above, and the amended registration, continuously since 2010. Plaintiff has spent time, effort and money advertising and promoting its products under the DEFIANCE Mark. As a result of Plaintiff's marketing, advertising, and promotion of its goods, the DEFIANCE Mark has become well-known as a distinctive indicator of the origin of Plaintiff's goods, has acquired a highly favorable reputation among members of the purchasing public, and has become a valuable symbol of Plaintiff's goodwill.

16. The DEFIANCE Mark is inherently distinctive as applied to Plaintiff's goods. Moreover, the distinctiveness of the DEFIANCE Mark as a source indicator for

Plaintiff's goods has increased by virtue of Plaintiff's use and promotion of the DEFIANCE Mark over many years.

DEFENDANT'S INFRINGING ACTIVITIES

17. On information and belief, Defendant DMI began manufacturing bolt action receivers for rifles in September 2009. In June 2016, DMI applied for U.S. trademark registrations for DEFIANCE (U.S. Ser. No. 87/066,827) and DEFIANCE MACHINE (U.S. Ser. No. 87/068,551), both for "Firearms" in International Class 9. The U.S. Trademark Office refused registration based on likelihood of confusion with the registered DEFIANCE Mark. DMI allowed both applications to go abandoned.

18. On June 11, 2017, DMI filed a new U.S. trademark application for DEFIANCE, with the narrowed description of goods "Component parts for firearms, namely, customized bolt action receivers" in International Class 13. U.S. Serial. No. 87/483,650.

19. On October 17, 2017, Defendant DMI was denied registration for its new DEFIANCE trademark application in the United States based on the registration of the DEFIANCE Mark.

20. On April 17, 2018, Defendant DMI filed a cancellation action against the DEFIANCE Mark in the United States Patent and Trademark Office. Cancellation Action 92,068,367.

21. DMI has recently filed applications internationally to register the mark DEFIANCE for firearms in International Class 13.

22. Based on the denials of DMI's applications as detailed above, Defendant has had actual notice of Plaintiff's ownership of its federally registered DEFIANCE Mark.

23. On information and belief, DMI was not using the mark DEFIANCE in connection with customized bolt action receivers in interstate commerce throughout the entire United States as of December 9, 2010.

24. On information and belief, DMI was not using the mark DEFIANCE in connection with firearms in interstate commerce in the United States at any time.

25. Defendant's sales of firearms or expansion of sales of customized bolt action receivers throughout the United States would trade on the goodwill of the DEFIANCE Mark and unfairly compete with the DEFIANCE branded goods sold by Plaintiff by creating consumer confusion as to sponsorship, affiliation or approval of DMI's goods by Plaintiff.

26. Defendant's conduct is willfully calculated to divert customers from Plaintiff.

PLAINTIFF'S PRIORITY OF TRADEMARK RIGHTS

27. Plaintiff has used, advertised and promoted the DEFIANCE Mark in interstate commerce, both actually and constructively, from a date long prior to any nationwide use of DEFIANCE as a mark by Defendant for customized bolt action receivers, or firearms.

28. As of December 9, 2010, Plaintiff has priority of use of DEFIANCE for firearms everywhere in the United States.

29. As of December 9, 2010, Defendant could not expand the geographic area where Defendant was then selling customized bolt action receivers in the United States unless no confusion resulted in connection with the goods sold by Plaintiff in connection with the DEFIANCE Mark.

30. Registration for the DEFIANCE Mark issued prior to the first use by Defendant of DEFIANCE as a mark for firearms.

31. Defendant is not, and has never been, authorized by Plaintiff or Kriss Systems SA to use the DEFIANCE Mark.

COUNT I
DECLARATORY JUDGMENT
(28 U.S.C. § 2201)

32. Plaintiff realleges and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.

33. As a result of Defendant's assertion of a right to use and authorize others to use DEFIANCE as a trademark in connection with firearms, an actual justiciable controversy exists within the jurisdiction of this Court pursuant to 28 U.S.C. § 2201 and 2202.

34. Plaintiff owns exclusive rights to use the DEFIANCE Mark in the United States for firearms.

35. Defendant's sale of firearms under the DEFIANCE trademark in the United States would create confusion for consumers seeking Plaintiff's goods.

36. Plaintiff's use of the DEFIANCE Mark for Plaintiff's goods is not likely to cause confusion among Defendant's customers for customized bolt action receivers.

37. Defendant has no right to use or authorize others to use the DEFIANCE Mark in connection with firearms.

38. By reason of the forgoing, Plaintiff is entitled to declaratory and injunctive relief.

COUNT II
FEDERAL TRADEMARK INFRINGEMENT
(15 U.S.C. § 1114)

39. Plaintiff realleges and incorporates by reference the allegations contained in preceding paragraphs as if fully set forth herein.

40. Defendant's use of DEFIANCE in connection with goods other than customized bolt action receivers is likely to cause consumer confusion, deception, and mistake by creating the false and misleading impression that Defendant sells products originating from Plaintiff.

41. Defendant's use of DEFIANCE (other than for customized bolt action receivers in locations where Defendant was doing business in December 2010) is likely to divert customers from Plaintiff to Defendant.

42. Defendant's use of the DEFIANCE Mark for firearms would cause confusion with the federally registered DEFIANCE Mark, in violation of 15 U.S.C. § 1114.

43. Unless enjoined by this Court, Defendant will cause confusion and deception of the consuming public and irreparable injury to the goodwill and reputation of the DEFIANCE Mark, for which Plaintiff has no adequate remedy at law. Plaintiff is entitled to injunctive relief.

44. Defendant's conduct is willful and intentional infringement of Plaintiff's rights in the federally registered DEFIANCE Mark in violation of 15 U.S.C. § 1114.

45. Defendant had both actual notice and constructive notice of registration of the DEFIANCE Mark prior to Defendant's unlawful efforts to expand use of the DEFIANCE Mark.

46. Defendant's actions demonstrate an intentional, willful, and malicious intent to trade on the goodwill associated with the DEFIANCE Mark entitling Plaintiff to an award of Defendant's profits, actual damages, enhanced profits and damages, costs, and attorneys' fees pursuant to 15 U.S.C. §§ 1114, 1116, and 1117.

COUNT III
FEDERAL UNFAIR COMPETITION AND FALSE DESIGNATION OF ORIGIN (15 U.S.C. § 1125)

47. Plaintiff realleges and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.

48. Defendant's use of the DEFIANCE Mark to falsely represent that Defendant offers Plaintiff's products is a willful, deliberate, false, and misleading representation of fact in violation of Section 43(a)(1)(B) of the Trademark Act of 1946, 15 U.S.C. § 1125(a)(1)(B).

49. Defendant's use of the DEFIANCE Mark to divert Plaintiff's customers constitutes unfair competition in violation of 15 U.S.C. § 1125(a)(1)(A).

50. Defendant's unauthorized use in commerce of the DEFIANCE Mark constitutes a false designation of origin and false or misleading representation of fact that is likely to confuse or deceive customers or cause customers to believe mistakenly that Defendant DMI and/or its products and services are offered by Plaintiff or are themselves affiliated, connected, or associated with or sponsored or approved by Plaintiff.

51. Defendant's actions constitute violations of 15 U.S.C. § 1125(a) in that such false designations and representations of origin and quality are used in or connection with the services and products that DMI causes to enter into or affect interstate commerce.

52. Unless enjoined by this Court, Defendant will cause, irreparable injury and damage to Plaintiff, for which Plaintiff has no adequate remedy at law. Plaintiff is entitled to injunctive relief.

53. Defendant's actions demonstrate an intentional, willful, and malicious intent to trade on the goodwill associated with the DEFIANCE Mark thus entitling Plaintiff to an

award of Defendant's profits, actual damages, enhanced profits and damages, costs, and attorneys' fees pursuant to 15 U.S.C. §§ 1114, 1116, and 1117.

COUNT IV
COMMON LAW UNFAIR COMPETITION

54. Plaintiff realleges and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.

55. Defendant's use of DEFIANCE to divert customers seeking Plaintiff's firearms to Defendant constitutes unfair competition in violation of Delaware common law.

56. Defendant's conduct has caused and will continue to cause irreparable injury to Plaintiff, its business reputation and the goodwill associated with the DEFIANCE Mark and its products and services. Plaintiff has no adequate remedy at law. Plaintiff will continue to be irreparably injured unless and until Defendant is enjoined from the unlawful conduct. Plaintiff is entitled to injunctive relief.

57. Defendant's intentional, willful, and malicious efforts to trade on Plaintiff's goodwill warrants the imposition of actual damages, and punitive damages.

COUNT V
UNJUST ENRICHMENT

58. Plaintiff realleges and incorporates by reference the preceding paragraphs as if fully set forth herein.

59. By expanding use of the DEFIANCE Mark (Plaintiff's intangible property) to divert consumers since December 2010, and by exploiting the goodwill associated with the DEFIANCE Mark (also Plaintiff's intangible property), Defendant has benefited at the expense of Plaintiff and Defendant has diverted and will continue to divert substantial profits from Plaintiff.

60. Defendant is not entitled to retain the profits derived from this unauthorized use of Plaintiff's reputation and goodwill.

61. Defendant's conduct constitutes unjust enrichment under Delaware common law.

62. Defendant's conduct warrants the imposition of actual and punitive damages.

JURY DEMAND

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

PRAYER FOR RELIEF

WHEREFORE Plaintiff prays for judgment:

A. Declaring the rights in the DEFIANCE Mark for firearms are superior to any rights which Defendant may claim.

B. Declaring Defendant has no right to use or authorize others to use the DEFIANCE Mark, except for customized bolt action receivers in the territories in which Defendant was engaged in interstate commerce in December 2010.

C. Declaring Defendant's use of the DEFIANCE Mark for firearms in the United States constitutes trademark infringement under federal law.

D. Permanently enjoining Defendant, its officers, agents, servants, employees, attorneys, representatives, successors, assigns, licensees and any and all other persons acting by, through or under authority from Defendant, either separately or jointly, from (1) using, selling, assigning, licensing or otherwise transferring the DEFIANCE Mark for goods (other than customized bolt action receivers in the territories in which Defendant was engaged in interstate commerce in December 2010), or authorizing others to do so; (2) interfering with or threatening to interfere with exclusive use of the DEFIANCE Mark for firearms by Plaintiff, its

successors, assigns or licensees; or (3) instituting or prosecuting any suit, administrative proceeding or other proceeding placing at issue the exclusive right of Plaintiff or its successors, assigns or licensees to use the DEFIANCE mark in the United States (except for customized bolt action receivers in the territories in which Defendant was engaged in interstate commerce in December 2010).

E. Entering Judgment in favor of Plaintiff and against Defendant for trademark infringement and unfair competition under Federal law and Delaware common law:

i. For damages in favor of Plaintiff and against Defendant, sufficient to compensate Plaintiff for the damages sustained as a result of Defendant's actions as alleged herein, including, but not limited to, (1) all profits received by Defendant from sales to misled consumers, trebled and (2) all additional damages sustained by Plaintiff as a result of Defendant's actions, trebled;

ii. For punitive damages;

iii. For reasonable attorneys' fees incurred as a result of Defendant's deliberate and willful infringing actions, pursuant to 15 U.S.C. § 1117 or Delaware state law;

iv. For prejudgment interest on all monetary awards;

v. For the costs of this suit; and

vi. For such other and further relief as the Court deems just and proper.

Exhibit 1

United States of America
United States Patent and Trademark Office

DEFIANCE

Reg. No. 4,516,747

Registered Apr. 22, 2014

Int. Cls.: 9, 13 and 25

TRADEMARK

PRINCIPAL REGISTER

KRISS INTERNATIONAL SA (SWITZERLAND SOCIÉTÉ ANONYME DE DROIT SUISSE)
CHEMIN DE LA VUARPILLIÈRE 35
CH-1260 NYON
SWITZERLAND

FOR: TELESCOPES FOR FIREARMS; CLOTHING FOR PROTECTION AGAINST ACCIDENTS, IRRADIATION AND FIRE, GLOVES FOR PROTECTION AGAINST ACCIDENTS, BULLET-PROOF VESTS, LIFE JACKETS, CLOTHING FOR PROTECTION AGAINST FIRE; BATTERIES FOR POCKET LAMPS, THERMIONIC LAMPS AND TUBES, LASERS, NOT FOR MEDICAL PURPOSES; OPTICAL GOODS, NAMELY, OPTICAL LENSES, TELESCOPES, GOGGLES FOR SPORTS, SIGHTING TELESCOPES FOR FIREARMS; SPECTACLE CASES; SIGNALING WHISTLES; DOG WHISTLES, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FOR: FIREARMS; AMMUNITION AND PROJECTILES; EXPLOSIVES; FIREWORKS, GUNS, HARPOON GUNS BEING WEAPONS, PISTOLS, AIR PISTOLS, REVOLVERS, AUTOMATIC MORTARS, ARTILLERY GUNS, ROCKET LAUNCHERS, BALLISTIC MISSILES; MINES; PROJECTILES; ROCKETS; FUSES FOR EXPLOSIVES FOR USE IN MINES; FUSES FOR EXPLOSIVES; BREECHES OF FIREARMS; NOISE-SUPPRESSORS FOR GUNS; CARTRIDGE POUCHES, CARTRIDGE BELTS, CARTRIDGE CASES; CLEANING BRUSHES FOR FIREARMS; FUSES FOR EXPLOSIVES; RIFLE CASES, GUNSTOCKS, RIFLE BARRELS, HAMMERS FOR GUNS AND RIFLES, CASES, SIGHTING MIRRORS FOR GUNS AND RIFLES, TRIGGER GUARDS FOR GUNS AND RIFLES, GUNSTOCKS; SIGHTS, OTHER THAN TELESCOPIC SIGHTS, FOR FIREARMS, FIREARM SIGHTS; FIRING PLATFORMS, IN CLASS 13 (U.S. CLS. 2 AND 9).

FOR: FOOTWEAR, GLOVES, BERETS, HOSIERY; BONNET HOODS, CAPS, HATS, CAP PEAKS, CHASUBLES; BOOTS, HALF-BOOTS; BELTS, MONEY BELTS; FOOTWEAR, BOOTS FOR SPORTS, SOCKS, SLIPPERS, SPATS, LEGGINGS; SHIRTS, CHEMISETTES, PULLOVERS, SLIPS, WAISTCOATS, JERSEYS, UNIFORMS, JACKETS, TROUSERS, OVERCOATS, PARKAS, PELERINES; MITTENS, MITRES; SWEAT-ABSORBENT UNDERCLOTHING; SCARVES, IN CLASS 25 (U.S. CLS. 22 AND 39).

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

PRIORITY DATE OF 12-9-2010 IS CLAIMED.

Michelle K. Lee

Deputy Director of the United States Patent and Trademark Office

Reg. No. 4,516,747 OWNER OF INTERNATIONAL REGISTRATION 1072293 DATED 12-27-2010, EXPIRES 12-27-2020.

SER. NO. 79-095,497, FILED 12-27-2010.

KRISTINA MORRIS, EXAMINING ATTORNEY

REQUIREMENTS TO MAINTAIN YOUR FEDERAL TRADEMARK REGISTRATION

WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.

Requirements in the First Ten Years*
What and When to File:

First Filing Deadline: You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. *See* 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.

Second Filing Deadline: You must file a Declaration of Use (or Excusable Nonuse) **and** an Application for Renewal between the 9th and 10th years after the registration date.* *See* 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*
What and When to File:

You must file a Declaration of Use (or Excusable Nonuse) **and** an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

The United States Patent and Trademark Office (USPTO) will NOT send you any future notice or reminder of these filing requirements.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the USPTO. The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. *See* 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. *See* 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see http://www.wipo.int/madrid/en/.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at http://www.uspto.gov.

Filing Receipt for Section 7 Request for Amendment or Correction of Registration Certificate Form and Next Steps

Registration number. 4516747.
Mark. DEFIANCE(Standard Characters, see https://tmng-al.uspto.gov/resting2/api/img/79095497/large).

Thank you for submitting your form to the U.S. Patent and Trademark Office (USPTO). Please read this filing receipt carefully and keep a copy for your records. If you find errors in your submission, the After You File page gives information about correcting errors.

Next steps

1. **In four to five days, please confirm that we received the documents submitted with this form** by checking Trademark Status and Document Retrieval (TSDR). If your documents do not appear in TSDR after four to five days, please email TrademarkAssistanceCenter@uspto.gov.
2. **Within approximately one to two months, a trademark specialist in the Post-Registration Division will review your submission.**

   If your submission is accepted, you will receive an updated Registration Certificate.

   If your submission is not accepted, you will receive a letter (Office action) explaining why it is not acceptable and how to proceed. Visit our page on keeping your registration alive for a video and other information on the post-registration process.
3. **Continue to check TSDR for any updates to your status until we send you a notice that your submission has been accepted or refused.** If you do not hear from us within three or four months of submitting this form, call the Post-Registration Division at (571) 272-9500.
4. **Keep your addresses, including email addresses, current in USPTO records so you receive email reminders about maintaining your registration.** You must file required maintenance documents at regular intervals or your registration will be canceled. We will send these reminders to all email addresses of record listed in TSDR. Use the address forms on our website to update your email addresses.
5. **Questions?** Please visit our website, email us, or call us at 1-800-786-9199 and select option 1.

The information submitted in the form appears below:

Section 7 Request Form

The table below presents the data as entered.

Input Field	Entered

REGISTRATION NUMBER	4516747
66(a) FILING BASIS	YES
LAW OFFICE ASSIGNED	LAW OFFICE 116
SERIAL NUMBER	79095497
MARK SECTION	
MARK	https://tmng-al.uspto.gov/resting2/api/img/79095497/large
LITERAL ELEMENT	DEFIANCE
STANDARD CHARACTERS	YES
USPTO-GENERATED IMAGE	YES
MARK STATEMENT	The mark consists of standard characters, without claim to any particular font style, size or color.
OWNER SECTION (current)	
NAME	Kriss International SA
STREET	Chemin de la Vuarpillière 35
CITY	CH-1260 Nyon
COUNTRY	Switzerland
EXPLANATION OF FILING	

The U.S. trademark registration no. 4,516,747 for DEFIANCE is the registered extension of the International Registration No. 1072293 for DEFIANCE. This Section 7 Request is being filed to delete the registered goods listed below from the U.S. registration. This requested change to the goods description for this registration only affects the extension of protection of the International Registration to the United States.

The following goods are to be deleted from this U.S. registration:

- All of Class 9: "Telescopes for firearms; clothing for protection against accidents, irradiation and fire, gloves for protection against accidents, bullet-proof vests, life jackets, clothing for protection against fire; batteries for pocket lamps, thermionic lamps and tubes, lasers, not for medical purposes; optical goods, namely, optical lenses, telescopes, goggles for sports, sighting telescopes for firearms; spectacle cases; signaling whistles; dog whistles"
- Class 13: "explosives; fireworks," "harpoon guns being weapons," "automatic mortars, artillery guns, rocket launchers, ballistic missiles; mines; projectiles; rockets; fuses for explosives for use in mines; fuses for explosives;" "fuses for explosives;"
- All of Class 25: "footwear, gloves, berets, hosiery; bonnet hoods, caps, hats, cap peaks, chasubles; boots, half-boots; belts, money belts; footwear, boots for sports, socks, slippers, spats, leggings; shirts, chemisettes, pullovers, slips, waistcoats, jerseys, uniforms, jackets,

trousers, overcoats, parkas, pelerines; mittens, mitres; sweat-absorbent underclothing; scarves"

Registrant respectfully requests that this Section 7 Request be approved.

GOODS AND/OR SERVICES SECTION (009)(current)	
U.S. CLASS	009
IDENTIFICATION	
Telescopes for firearms; clothing for protection against accidents, irradiation and fire, gloves for protection against accidents, bullet-proof vests, life jackets, clothing for protection against fire; batteries for pocket lamps, thermionic lamps and tubes, lasers, not for medical purposes; optical goods, namely, optical lenses, telescopes, goggles for sports, sighting telescopes for firearms; spectacle cases; signaling whistles; dog whistles	
GOODS AND/OR SERVICES SECTION (009)(proposed)	
U.S. CLASS	009
IDENTIFICATION	DELETE CLASS ENTIRELY
GOODS AND/OR SERVICES SECTION (013)(current)	
U.S. CLASS	013
IDENTIFICATION	
Firearms; ammunition and projectiles; explosives; fireworks, guns, harpoon guns being weapons, pistols, air pistols, revolvers, automatic mortars, artillery guns, rocket launchers, ballistic missiles; mines; projectiles; rockets; fuses for explosives for use in mines; fuses for explosives; breeches of firearms; noise-suppressors for guns; cartridge pouches, cartridge belts, cartridge cases; cleaning brushes for firearms; fuses for explosives; rifle cases, gunstocks, rifle barrels, hammers for guns and rifles, cases, sighting mirrors for guns and rifles, trigger guards for guns and rifles, gunstocks; sights, other than telescopic sights, for firearms, firearm sights; firing platforms	
GOODS AND/OR SERVICES SECTION (013)(proposed)	
U.S. CLASS	013
IDENTIFICATION	
Firearms; ammunition and projectiles; guns, pistols, air pistols, revolvers, breeches of firearms; noise-suppressors for guns; cartridge pouches, cartridge belts, cartridge cases; cleaning brushes for firearms; rifle cases, gunstocks, rifle barrels, hammers for guns and rifles, cases, sighting mirrors for guns and rifles, trigger guards for guns and rifles, gunstocks; sights, other than telescopic sights, for firearms, firearm sights; firing platforms	
GOODS AND/OR SERVICES SECTION (025)(current)	
U.S. CLASS	025

IDENTIFICATION	
footwear, gloves, berets, hosiery; bonnet hoods, caps, hats, cap peaks, chasubles; boots, half-boots; belts, money belts; footwear, boots for sports, socks, slippers, spats, leggings; shirts, chemisettes, pullovers, slips, waistcoats, jerseys, uniforms, jackets, trousers, overcoats, parkas, pelerines; mittens, mitres; sweat-absorbent underclothing; scarves	
GOODS AND/OR SERVICES SECTION (025)(proposed)	
U.S. CLASS	025
IDENTIFICATION	DELETE CLASS ENTIRELY
ATTORNEY SECTION	
ORIGINAL ADDRESS	KRISS INTERNATIONAL SA CHEMIN DE LA VUARPILLIÈRE 35 NYON Switzerland CH-1260
NEW ATTORNEY SECTION	
NAME	Stacie K. Smith
FIRM NAME	Fennemore Craig, P.C.
INDIVIDUAL ATTORNEY DOCKET/REFERENCE NUMBER	046409.0001
OTHER APPOINTED ATTORNEY	Susan Stone Rosenfield and the attorneys of Fennemore Craig, P.C.
INTERNAL ADDRESS	Suite 600
STREET	2394 East Camelback Road
CITY	Phoenix
STATE	Arizona
ZIP/POSTAL CODE	85016-3429
COUNTRY	United States
PHONE	602-916-5451
FAX	602-916-5651
EMAIL	ip@fclaw.com
AUTHORIZED EMAIL COMMUNICATION	Yes
CORRESPONDENCE SECTION	
	KRISS INTERNATIONAL SA

ORIGINAL ADDRESS	CHEMIN DE LA VUARPILLIÈRE 35 NYON Switzerland CH-1260
NEW CORRESPONDENCE SECTION	
NAME	Stacie K. Smith
FIRM NAME	Fennemore Craig, P.C.
DOCKET/REFERENCE NUMBER	046409.0001
INTERNAL ADDRESS	Suite 600
STREET	2394 East Camelback Road
CITY	Phoenix
STATE	Arizona
ZIP/POSTAL CODE	85016-3429
COUNTRY	United States
PHONE	602-916-5451
FAX	602-916-5651
EMAIL	ip@fclaw.com
AUTHORIZED EMAIL COMMUNICATION	Yes
PAYMENT SECTION	
SECTION 7 FEE	100
TOTAL FEES DUE	100
SIGNATURE SECTION	
DECLARATION SIGNATURE	/philippe guignard/
SIGNATORY'S NAME	Philippe Guignard
SIGNATORY'S POSITION	Delegate Director
DATE SIGNED	07/27/2018
REQUEST SIGNATURE	/Stacie K Smith/
SIGNATORY'S NAME	Stacie K. Smith
SIGNATORY'S POSITION	Attorney of record, Arizona bar member
DATE SIGNED	07/27/2018
AUTHORIZED SIGNATORY	YES

CONCURRENT § 8, 8 &15, OR 8 &9 FILED	NO

To the Commissioner for Trademarks:

The registrant requests the following amendment(s) to registration no. **4516747** DEFIANCE(Standard Characters, see https://tmng-al.uspto.gov/resting2/api/img/79095497/large) has been amended as follows:

EXPLANATION OF FILING

The U.S. trademark registration no. 4,516,747 for DEFIANCE is the registered extension of the International Registration No. 1072293 for DEFIANCE. This Section 7 Request is being filed to delete the registered goods listed below from the U.S. registration. This requested change to the goods description for this registration only affects the extension of protection of the International Registration to the United States.

The following goods are to be deleted from this U.S. registration:

- All of Class 9: "Telescopes for firearms; clothing for protection against accidents, irradiation and fire, gloves for protection against accidents, bullet-proof vests, life jackets, clothing for protection against fire; batteries for pocket lamps, thermionic lamps and tubes, lasers, not for medical purposes; optical goods, namely, optical lenses, telescopes, goggles for sports, sighting telescopes for firearms; spectacle cases; signaling whistles; dog whistles"
- Class 13: "explosives; fireworks," "harpoon guns being weapons," "automatic mortars, artillery guns, rocket launchers, ballistic missiles; mines; projectiles; rockets; fuses for explosives for use in mines; fuses for explosives;" "fuses for explosives;"
- All of Class 25: "footwear, gloves, berets, hosiery; bonnet hoods, caps, hats, cap peaks, chasubles; boots, half-boots; belts, money belts; footwear, boots for sports, socks, slippers, spats, leggings; shirts, chemisettes, pullovers, slips, waistcoats, jerseys, uniforms, jackets, trousers, overcoats, parkas, pelerines; mittens, mitres; sweat-absorbent underclothing; scarves"

Registrant respectfully requests that this Section 7 Request be approved.

CLASSIFICATION AND LISTING OF GOODS/SERVICES
Registrant proposes to amend the following class of goods/services in the application:
Current: Class 009 for Telescopes for firearms; clothing for protection against accidents, irradiation and fire, gloves for protection against accidents, bullet-proof vests, life jackets, clothing for protection against fire; batteries for pocket lamps, thermionic lamps and tubes, lasers, not for medical purposes; optical goods, namely, optical lenses, telescopes, goggles for sports, sighting telescopes for firearms; spectacle cases; signaling whistles; dog whistles
Original Filing Basis:
Filing Basis Section 66(a), Request for Extension of Protection to the United States. Section 66(a) of the Trademark Act, 15 U.S.C. §1141f.

Proposed: Class 009 for DELETE CLASS ENTIRELY

Filing Basis Section 66(a), Request for Extension of Protection to the United States. Section 66(a) of the Trademark Act, 15 U.S.C. §1141f.

Registrant proposes to amend the following class of goods/services in the application:
Current: Class 013 for Firearms; ammunition and projectiles; explosives; fireworks, guns, harpoon guns being weapons, pistols, air pistols, revolvers, automatic mortars, artillery guns, rocket launchers, ballistic missiles; mines; projectiles; rockets; fuses for explosives for use in mines; fuses for explosives; breeches of firearms; noise-suppressors for guns; cartridge pouches, cartridge belts, cartridge cases; cleaning brushes for firearms; fuses for explosives; rifle cases, gunstocks, rifle barrels, hammers for guns and rifles, cases, sighting mirrors for guns and rifles, trigger guards for guns and rifles, gunstocks; sights, other than telescopic sights, for firearms, firearm sights; firing platforms
Original Filing Basis:
Filing Basis Section 66(a), Request for Extension of Protection to the United States. Section 66(a) of the Trademark Act, 15 U.S.C. §1141f.

Proposed: Class 013 for Firearms; ammunition and projectiles; guns, pistols, air pistols, revolvers, breeches of firearms; noise-suppressors for guns; cartridge pouches, cartridge belts, cartridge cases; cleaning brushes for firearms; rifle cases, gunstocks, rifle barrels, hammers for guns and rifles, cases, sighting mirrors for guns and rifles, trigger guards for guns and rifles, gunstocks; sights, other than telescopic sights, for firearms, firearm sights; firing platforms

Filing Basis Section 66(a), Request for Extension of Protection to the United States. Section 66(a) of the Trademark Act, 15 U.S.C. §1141f.

Registrant proposes to amend the following class of goods/services in the application:
Current: Class 025 for footwear, gloves, berets, hosiery; bonnet hoods, caps, hats, cap peaks, chasubles; boots, half-boots; belts, money belts; footwear, boots for sports, socks, slippers, spats, leggings; shirts, chemisettes, pullovers, slips, waistcoats, jerseys, uniforms, jackets, trousers, overcoats, parkas, pelerines; mittens, mitres; sweat-absorbent underclothing; scarves
Original Filing Basis:
Filing Basis Section 66(a), Request for Extension of Protection to the United States. Section 66(a) of the Trademark Act, 15 U.S.C. §1141f.

Proposed: Class 025 for DELETE CLASS ENTIRELY

Filing Basis Section 66(a), Request for Extension of Protection to the United States. Section 66(a) of the Trademark Act, 15 U.S.C. §1141f.

ATTORNEY INFORMATION
Registrant proposes to amend the following:
Current: KRISS INTERNATIONAL SA CHEMIN DE LA VUARPILLIÈRE 35 NYON Switzerland CH-1260
Proposed: Stacie K. Smith of Fennemore Craig, P.C., having an address of 2394 East Camelback Road Suite 600 Phoenix, Arizona United States 85016-3429, whose e-mail address is ip@fclaw.com, whose phone number is 602-916-5451 and whose fax number is 602-916-5651.
The attorney docket/reference number is 046409.0001.

The Other Appointed Attorney(s): Susan Stone Rosenfield and the attorneys of Fennemore Craig, P.C..

CORRESPONDENCE ADDRESS CHANGE
Registrant proposes to amend the following:
Current: KRISS INTERNATIONAL SA CHEMIN DE LA VUARPILLIÈRE 35 NYON Switzerland CH-1260
Proposed: Stacie K. Smith of Fennemore Craig, P.C., having an address of 2394 East Camelback Road Suite 600 Phoenix, Arizona United States 85016-3429, whose e-mail address is ip@fclaw.com, whose phone number is 602-916-5451 and whose fax number is 602-916-5651.
The docket/reference number is 046409.0001.

FEE(S)
Fee(s) in the amount of $100 is being submitted.

Signature: /philippe guignard/ Date: 07/27/2018
Signatory's Name: Philippe Guignard
Signatory's Position: Delegate Director

Request Signature
Signature: /Stacie K Smith/ Date: 07/27/2018
Signatory's Name: Stacie K. Smith
Signatory's Position: Attorney of record, Arizona bar member

The signatory has confirmed that he/she is an attorney who is a member in good standing of the bar of the highest court of a U.S. state, which includes the District of Columbia, Puerto Rico, and other federal territories and possessions; and he/she is currently the owner's/holder's attorney or an associate thereof; and to the best of his/her knowledge, if prior to his/her appointment another U.S. attorney or a Canadian attorney/agent not currently associated with his/her company/firm previously represented the registrant in this matter: (1) the owner/holder has filed or is concurrently filing a signed revocation of or substitute power of attorney with the USPTO; (2) the USPTO has granted the request of the prior representative to withdraw; (3) the owner/holder has filed a power of attorney appointing him/her in this matter; or (4) the owner's/holder's appointed U.S. attorney or Canadian attorney/agent has filed a power of attorney appointing him/her as an associate attorney in this matter.

The applicant is NOT filing a Declaration of Use of Mark under Section 8; a Combined Declaration of Use of Mark under Sections 8 & 15; or a Combined Declaration of Use of Mark/Application for Renewal of Registration of Mark under Sections 8 & 9 in conjunction with this Section 7 Request.

Thank you,

The TEAS support team
Fri Jul 27 16:48:57 EDT 2018
STAMP: USPTO/S7R-74.206.99.126-20180727164857251795-4516747-

6101cd9a08af199a1f497e7bbd430aae1238fd763b88afa3e1558bfb2d4a556cf0-DA-3354-20180727140905627256

WIPO | MADRID
The International Trademark System

THE DOCUMENTS YOU HAVE UPLOADED USING CONTACT MADRID HAVE BEEN RECEIVED.

Your request is currently being reviewed. Please print or save it for your records. You can use the WIPO Reference number provided to track the status of your request in Madrid Monitor. You may contact us should you have any concerns or questions.

Date of submission : **21 Jul 2018 01:05**

Email where confirmation will be sent : **ip@fclaw.com**

File	Form	Reference number	Your internal file reference (optional)	Additional comment
Form MM5-IRN 1072293 for DEFIANCE.pdf *19-07-2018 wire confirmation.pdf*	MM5 - Change in Ownership	1072293	046409.0001	Wire transfer confirmation for payment of fee

MM5(E)

REQUEST FOR THE RECORDING OF A CHANGE IN OWNERSHIP

For the holder (transferor)/new owner (transferee)	For the Office
This request contains the following number of continuation sheets:	Office's reference:
Holder/new owner's reference:	

1 **INTERNATIONAL REGISTRATION NUMBER(S)**
(several international registrations may be indicated below, provided that all registrations concerned are the subject of a total change in ownership, as provided for in item 6(a))

1072293

2 **NAME OF THE HOLDER (TRANSFEROR)**
(as recorded in the International Register)

Kriss International SA

3 **NEW OWNER (TRANSFEREE)**

(a) Name: KRISS Systems SA

(b) Address: En Courta Rama 10
CH-1163 Etoy
Switzerland

(c) Address for correspondence: KRISS Systems SA
En Courta Rama 10
CH-1163 Etoy
Switzerland

(d) Telephone: +17149303262 Fax:

E-mail address: ch.guignard@kriss-usa.com

By providing an e-mail address, any further correspondence from the International Bureau related to this/these international registration(s) will be sent only electronically and, **therefore, you will no longer receive any paper correspondence**. Likewise, any further correspondence from the International Bureau related to other international applications or international registrations for which the same e-mail address has been, or will be, provided will also be sent only electronically. Please note that, for the purpose of electronic communication, there can be only one e-mail address recorded per each international registration.

4 ENTITLEMENT OF THE NEW OWNER (TRANSFEREE) TO BE THE HOLDER OF THE INTERNATIONAL REGISTRATION

(a) Indicate in the appropriate space(s):

(i) the name of the Contracting State of which the new owner (transferee) is a national; and/or,

---

(ii) the name of the State member of a Contracting Organization of which the new owner (transferee) is a national; and/or,

---

(iii) the name of the Contracting Party in the territory of which the new owner (transferee) is domiciled; and/or,

---

(iv) the name of the Contracting Party in the territory of which the new owner (transferee) has a real and effective industrial or commercial establishment:

Switzerland

(b) Where the new owner (transferee) is not a national of a Contracting State or of a State member of a Contracting Organization and the address given in item 3(b) is not in the territory of any of the Contracting Parties mentioned in paragraph (a)(iii) or (iv) of the present item, indicate in the space provided below:

(i) the address of the new owner (transferee) in the territory of the Contracting Party mentioned in paragraph (a)(iii) of the present item; or,

(ii) the address of the new owner's (transferee) industrial or commercial establishment in the territory of the Contracting Party mentioned in paragraph (a)(iv) of the present item.

---

5 APPOINTMENT OF A REPRESENTATIVE BY THE NEW OWNER (TRANSFEREE)[1]

Name: ---

Address: ---

Telephone: --- Fax: ---

E-mail address: ---

By providing an e-mail address, any further correspondence from the International Bureau related to this/these international registration(s) will be sent only electronically and, **therefore, you will no longer receive any paper correspondence**. Likewise, any further correspondence from the International Bureau related to other international applications or international registrations for which the same e-mail address has been, or will be, provided will also be sent only electronically. Please note that, for the purpose of electronic communication, there can be only one e-mail address recorded per each international registration.

SIGNATURE OF THE NEW OWNER (TRANSFEREE) APPOINTING THE ABOVE REPRESENTATIVE (**compulsory**)

---

[1] This item should be used where the new owner (*transferee*) wishes to appoint a representative. Note that, if the person recorded as the representative of the holder (*transferor*) is to be recorded as the representative of the new owner (*transferee*), such appointment should be made by completing this item.

6 SCOPE OF THE CHANGE IN OWNERSHIP

(check either (a) or (b))

(a) ☑ TOTAL CHANGE IN OWNERSHIP (the change in ownership is to be recorded for **all** the Contracting Parties designated in the international registration(s) indicated in item 1, and for **all** the goods and services covered by such international registration(s));

(b) ☐ PARTIAL CHANGE IN OWNERSHIP **(read note No. 3 on the cover page before checking this box)**

(i) the change in ownership is to be recorded for the designated Contracting Parties indicated below (if no Contracting Party is indicated, it will be understood that the change in ownership is to be recorded in respect of all the designated Contracting Parties); and/or,

(ii) the change in ownership is to be recorded for the goods and services indicated below (grouped in the appropriate classes); if no goods and services are indicated, it will be understood that the change in ownership is to be recorded in respect of all goods and services.

You can find indications that are pre-accepted by the International Bureau in the Madrid Goods & Services Manager (MGS) at www.wipo.int/mgs/.

Please make consistent use of a semicolon (;) to clearly specify the goods and services indications in your list, e.g.:
09 Scientific, optical and electronic apparatus and instruments; screens for photoengraving; computers.
35 Advertising; compilation of statistics; commercial information agencies.

Please use font "Courier New" or "Times New Roman", size 12 pt, or above.

☐ If the space provided above is not sufficient, check the box and use a continuation sheet

7 MISCELLANEOUS INDICATIONS

(a) Indications concerning the new owner (transferee) (as may be required by certain designated Contracting Parties; **only** provide indications in **either** item (i) **or** in item (ii) but **not in both** items):

(i) if the new owner (transferee) is **a natural person**, indicate the nationality:

(ii) if the new owner (transferee) is **a legal entity** (please, provide **both** the following indications):

– legal nature of the legal entity: Société anonyme

– State (country) and, where applicable, territorial unit within that State (canton, province, state, etc.), under the law of which the said legal entity has been organized:
Switzerland

(b) The new owner (transferee) may choose a preferred language for correspondence:

☐ English ☑ French ☐ Spanish

8 **SIGNATURE BY THE HOLDER (TRANSFEROR) AND/OR HIS REPRESENTATIVE**

Holder (transferor)
(as recorded in the International Register)

By signing this form, I declare that I am entitled to sign it under the applicable law:

Name: Christophe Guignard

Signature:

Representative of the holder (transferor)
(as recorded in the International Register)

By signing this form, I declare that I am entitled to sign it under the applicable law:

Name:

Signature:

9 **OFFICE OF THE CONTRACTING PARTY (OF THE RECORDED HOLDER (TRANSFEROR) OR THAT OF THE NEW OWNER (TRANSFEREE)) PRESENTING THE REQUEST**
(where the request is presented through an Office)

Name of the Office:

Name and signature of the official signing on behalf of the Office:

By signing this form, I declare that I am entitled to sign it under the applicable law:

Name and e-mail address of the contact person in the Office:

FEE CALCULATION SHEET

(a) INSTRUCTIONS TO DEBIT FROM A CURRENT ACCOUNT

☐ The International Bureau is hereby instructed to debit the required amount of fees from a current account opened with the International Bureau (if this box is checked, it is not necessary to complete (b)).

Holder of the account: ..... Account number: .....

Identity of the party giving the instructions: .....

(b) AMOUNT OF FEES

Amount (177 Swiss francs) x 1 (per international registration mentioned in item 1) **Grand total (Swiss francs)** 177

(c) METHOD OF PAYMENT

Identity of the party effecting the payment: Fennemore Craig, PC

Payment received and acknowledged by WIPO ☐ WIPO receipt number .....

Payment made to WIPO bank account
IBAN No. CH51 0483 5048 7080 8100 0
Crédit Suisse, CH-1211 Geneva 70
Swift/BIC: CRESCHZZ80A
☑ Payment identification: Wire Service Ref. No. 180719164954 dd/mm/yyyy: 19/07/2018

Payment made to WIPO postal account (within Europe only)
IBAN No. CH03 0900 0000 1200 5000 8
Swift/BIC: POFICHBE
☐ Payment identification ..... dd/mm/yyyy .....

Dated: July 27, 2018

SMITH, KATZENSTEIN & JENKINS, LLP

/s/ Eve H. Ormerod
Kathleen M. Miller (No. 2898)
Eve H. Ormerod (No. 5369)
1000 West Street, Suite 1501
Wilmington, DE 19801
(302) 652-8400
kmiller@skjlaw.com
eormerod@skjlaw.com

Attorneys for Plaintiff Kriss USA, Inc.

Of Counsel:
FENNEMORE CRAIG, P.C.
Ray K. Harris, Esq.
2394 E. Camelback Road, Ste. 600
Phoenix, AZ 85016