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Filing date: **04/22/2024**

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

Petition for Cancellation

Notice is hereby given that the following party has filed a petition to cancel the registration indicated below.

Petitioner information

Name	Coachella Music Festival, LLC		
Entity	limited liability company	Incorporated or registered in	Delaware
Address	425 W. 11TH STREET SUITE 400 LOS ANGELES, CA 90015 UNITED STATES		
Attorney information	STEVEN E. LAURIDSEN TUCKER ELLIS LLP 515 SOUTH FLOWER STREET 42ND FLOOR LOS ANGELES, CA 90071 UNITED STATES Primary email: trademarks@tuckerellis.com Secondary email(s): steven.lauridsen@tuckerellis.com, david.steele@tuckerellis.com, dina.roumiantseva@tuckerellis.com, martin.yi@tuckerellis.com, eddie.gomez@tuckerellis.com 2134303400		
Docket no.	014223-746		

Registration subject to cancellation

Registration no.	6401647	Registration date	06/29/2021
Register	Principal		
Registrant	CV BREWING CO INC 30640 GUNTHER ST. THOUSAND PALMS, CA 92276 UNITED STATES		

Goods/services subject to cancellation

Class 032. First Use: Jan 1, 2019 First Use In Commerce: Jan 1, 2019
All goods and services in the class are subject to cancellation, namely: Beer

Grounds for cancellation

No use of mark in commerce before application, amendment to allege use, or statement of use was due	Trademark Act Sections 14(1) and 1(a), (c), and (d)
False suggestion of a connection with persons, living or dead, institutions, beliefs, or national symbols	Trademark Act Sections 14(3) and 2(a)


Fraud on the USPTO	Trademark Act Section 14(3); In re Bose Corp., 580 F.3d 1240, 91 USPQ2d 1938 (Fed. Cir. 2009)
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Marks cited by petitioner as basis for cancellation


U.S. registration no.	3196119	Application date	08/24/2005
Register	Principal		
Registration date	01/09/2007	Foreign priority date	NONE
Word mark	COACHELLA		
Design mark	COACHELLA		
Description of mark	NONE		
Goods/services	Class 041. First use: First Use: Oct 1999 First Use In Commerce: Oct 1999 Entertainment, namely, organizing and producing musical events		

U.S. registration no.	4270482	Application date	09/20/2010
Register	Principal		
Registration date	01/08/2013	Foreign priority date	NONE
Word mark	COACHELLA		
Design mark	COACHELLA		
Description of mark	NONE		
Goods/services	Class 016. First use: First Use: Oct 1999 First Use In Commerce: Oct 1999 Posters Class 021. First use: First Use: May 2009 First Use In Commerce: May 2009 Bottles, sold empty; Plastic water bottles sold empty Class 025. First use: First Use: Oct 1999 First Use In Commerce: Oct 1999 [Halter tops;] Hooded sweat shirts; Long-sleeved shirts; Scarves; Shirts; T-shirts; Tank tops		

U.S. registration no.	3196129	Application date	08/25/2005
Register	Principal		
Registration date	01/09/2007	Foreign priority date	NONE
Word mark	COACHELLA		


Design mark			
Description of mark	NONE		
Goods/services	Class 041. First use: First Use: Oct 1999 First Use In Commerce: Oct 1999 Entertainment, namely, organizing and producing musical events		

U.S. registration no.	4266400	Application date	09/20/2010
Register	Principal		
Registration date	01/01/2013	Foreign priority date	NONE
Word mark	COACHELLA		
Design mark			
Description of mark	The mark consists of stylized rendition of "COACHELLA".		
Goods/services	Class 016. First use: First Use: Oct 1999 First Use In Commerce: Oct 1999 Posters Class 025. First use: First Use: Oct 1999 First Use In Commerce: Oct 1999 [Halter tops;] Hooded sweat shirts; Long-sleeved shirts; Scarves; Shirts; T-shirts; Tank tops		

U.S. registration no.	5235905	Application date	11/15/2016
Register	Principal		
Registration date	07/04/2017	Foreign priority date	NONE
Word mark	COACHELLA		
Design mark			
Description of mark	NONE		
Goods/services	Class 043. First use: First Use: Apr 16, 2010 First Use In Commerce: Apr 16, 2010 Hotel accommodation services; Providing campground facilities		

U.S. registration no.	5235903	Application date	11/15/2016
Register	Principal		
Registration date	07/04/2017	Foreign priority date	NONE
Word mark	COACHELLA		


Design mark	COACHELLA
Description of mark	The mark consists of a stylized rendition of "COACHELLA."
Goods/services	Class 043. First use: First Use: Apr 16, 2010 First Use In Commerce: Apr 16, 2010 Hotel accommodation services; Providing campground facilities


U.S. registration no.	3196128	Application date	08/25/2005
Register	Principal		
Registration date	01/09/2007	Foreign priority date	NONE
Word mark	COACHELLA VALLEY MUSIC AND ARTS FESTIVAL		
Design mark			
Description of mark	NONE		
Goods/services	Class 041. First use: First Use: Oct 1999 First Use In Commerce: Oct 1999 Entertainment, namely, organizing and producing musical events		


U.S. registration no.	3965563	Application date	09/20/2010
Register	Principal		
Registration date	05/24/2011	Foreign priority date	NONE
Word mark	COACHELLA VALLEY MUSIC & ARTS FESTIVAL		
Design mark			
Description of mark	NONE		
Goods/services	Class 018. First use: First Use: May 2003 First Use In Commerce: May 2003 [Messenger bags;] Tote bags [; Travel bags]		

U.S. registration no.	4008651	Application date	09/20/2010
Register	Principal		
Registration date	08/09/2011	Foreign priority date	NONE
Word mark	COACHELLA VALLEY MUSIC AND ARTS FESTIVAL		
Design mark			
Description of mark	NONE		
Goods/services	Class 016. First use: First Use: Oct 1999 First Use In Commerce: Oct 1999 Posters Class 025. First use: First Use: Oct 1999 First Use In Commerce: Oct 1999		

	Halter tops; Hooded sweat shirts; Long-sleeved shirts; Scarves; Shirts; T-shirts; Tank tops
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U.S. registration no.	5075233	Application date	05/15/2015
Register	Principal		
Registration date	11/01/2016	Foreign priority date	NONE
Word mark	CHELLA		
Design mark			
Description of mark	NONE		
Goods/services	Class 025. First use: First Use: Apr 15, 2016 First Use In Commerce: Apr 15, 2016 Long-sleeved shirts; Shirts; T-shirts		

U.S. registration no.	5520063	Application date	05/15/2015
Register	Principal		
Registration date	07/17/2018	Foreign priority date	NONE
Word mark	CHELLA		
Design mark			
Description of mark	NONE		
Goods/services	Class 041. First use: First Use: Apr 19, 2018 First Use In Commerce: Apr 19, 2018 Arranging, organizing, conducting, and hosting social entertainment events; Entertainment, namely, production of musical events; Organizing cultural and arts events		

U.S. registration no.	7196158	Application date	11/14/2022
Register	Principal		
Registration date	10/17/2023	Foreign priority date	NONE
Word mark	C		
Design mark			
Description of	The mark consists of a stylized letter "C" with a stylized palm tree within.		

mark	
Goods/services	Class 041. First use: First Use: Apr 15, 2022 First Use In Commerce: Apr 15, 2022 Entertainment in the nature of live performances by musicians, bands, and artists.; Entertainment services in the nature of production of live performances, concerts, and musical events.; Organizing exhibitions for artists

Attachments	78699377#TMSN.png(bytes) 85133507#TMSN.png(bytes) 78700875#TMSN.png(bytes) 85133569#TMSN.png(bytes) 87238004#TMSN.png(bytes) 87237975#TMSN.png(bytes) 78700858#TMSN.png(bytes) 85133707#TMSN.png(bytes) 85133617#TMSN.png(bytes) 86980328#TMSN.png(bytes) 86983919#TMSN.png(bytes) 97677203#TMSN.png(bytes) 2024-04-22.01 - Coachella-CVBCo - Petition for Cancellation.pdf(482063 bytes)
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Signature	/Steven E Lauridsen/
Name	Steven E. Lauridsen
Date	04/22/2024

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

COACHELLA MUSIC FESTIVAL, LLC,
Petitioner,

v.

CV BREWING CO INC,
Respondent.

Cancellation No.

Registration No. 6,401,647

PETITION FOR CANCELLATION

Petitioner Coachella Music Festival, LLC, a Delaware limited liability company having its place of business at 425 W. 11th Street, Suite 400, Los Angeles, CA 90015, believes it has been and will continue to be damaged by the continued registration of the mark COACHELLA VALLEY BREWING CO. and Design (“Respondent’s Logo”) as shown below:



and as shown in Registration No. 6,401,647 (“Respondent’s Registration”) in International Class 32. Petitioner therefore hereby petitions to cancel this registration on the basis of false association, fraud on the Patent and Trademark Office (“USPTO”), and that the underlying application is void *ab initio*.

As grounds for cancellation, Petitioner alleges that:

1. Petitioner owns the intellectual property for the famous Coachella Valley Music and Arts Festival (“Coachella” or the “Festival”), one of the country’s premier music and arts festivals. Petitioner owns the exclusive rights to Coachella, including the COACHELLA, COACHELLA (stylized), and COACHELLA VALLEY MUSIC AND ARTS FESTIVAL trademarks and service marks (the “Coachella Marks”), which it uses in connection with Coachella, related music and arts events, and related goods and services.

2. Held annually at the Empire Polo Club in the beautiful Southern California desert, Coachella is one of the most critically acclaimed music festivals in the world. The entire festival site, which includes the festival grounds, on-site camping, parking, and support operations, encompasses over 800 acres.

3. Coachella was first held in October 1999 and drew some 25,000 attendees into the California desert near Palm Springs. Over the years,¹ both Coachella’s attendance and its prominence have grown. Attendance at Coachella, aggregated over the multi-day event, now totals nearly 750,000 attendees per year.

4. Coachella showcases some of the most groundbreaking artists from all genres of music along with a substantial selection of art installations from all over the world. Coachella attracts performances by unknown up and coming artists as well as some of the world’s biggest mega-stars, including: AC/DC, Bad Bunny, Beyoncé, Beastie Boys, Bjork, BLACKPINK, Cardi B, Daft Punk, Doja Cat, Dr. Dre & Snoop Dogg, Guns N’ Roses, Harry Styles, Jane’s Addiction, Jay-Z, Lady Gaga, Lana Del Rey, Leonard Cohen, Madonna, Paul McCartney, Prince, Radiohead, Red Hot Chili Peppers, The Cure, The Weeknd, and Tyler, and the Creator, to list just a few.

¹ Coachella was next held in April 2001 and has been held annually thereafter, except in 2020 and 2021, when the Festival was postponed due to the COVID-19 pandemic.

5. Coachella is about more than just music. Coachella has camping facilities for some 15,000 attendees (complete with a karaoke lounge and a general store), on-site lodges, hotel packages, and an amazing selection of food and beverages from a wide range of restaurants. Coachella also features extensive art exhibits, including sculptures and interactive and immersive art. The music, the food, the art, and of course, the fellowship of other attendees, taken together, makes Coachella more than just a concert to attend—it truly is an experience.

6. Coachella is widely recognized for its fashion and has developed a reputation as an unofficial kick-off to summer styles, attracting sponsorships from recognized and esteemed international brands such as BMW, Google Pixel, Neutrogena, YouTube, and more.

7. Numerous approved beverage companies, such as Absolut, Heineken, Aperol Spritz, White Claw, and Coca-Cola, sponsor Coachella.

8. Petitioner is very selective concerning with whom it will enter into a sponsorship arrangement, and Coachella sponsorships are worth substantial sums due to the exposure they garner.

9. Petitioner owns and operates Coachella's website, available at www.coachella.com. This website has received over 20 million page views in 2019, hosting nearly 8.5 million users over nearly 12 million sessions. Between January 1, 2022 and May 1, 2022, the www.coachella.com website received over 15 million page views and hosted more than 6 million users in over 10 million sessions.

10. Petitioner also produces a mobile app for Coachella for use on iPhone / iPad and Android devices.

11. Petitioner extensively promotes Coachella through a variety of media, including via the Internet on its website, available at www.coachella.com, and on numerous social media sites including YouTube, Facebook, Instagram, Pinterest, and Twitter.

12. Coachella's YouTube account has over 3.24 million subscribers; its Facebook account has over 2.4 million followers; its Twitter account has over 1 million followers; and its Instagram account has over 2.9 million followers.

13. An Internet search using the Google search engine for the term "Coachella music festival" provided over 31 million hits; a cursory review of the results shows nearly every hit was related to Petitioner's Festival; and the first three search results were to different pages on Petitioner's website, www.coachella.com.

14. An internet search using the Google search engine for the term "Coachella" provides 110 million hits. A cursory review of the results shows that nearly every hit relates to Petitioner's Festival. The first search result is Petitioner's website, www.coachella.com. The second search result is Petitioner's page on YouTube, [www.https://www.youtube.com/user/coachella](https://www.youtube.com/user/coachella), and the third search result is Petitioner's Twitter page, www.twitter.com/coachella. Petitioner and its affiliates have invested substantial sums in media and related content to promote Coachella.

15. Tracked online media impressions (advertisements) for the Coachella festival from April 8, 2022 to April 29, 2022 exceeded 111 billion impressions.

16. In 2023, over 500 credentialed journalists, from print media, radio, television, and the Internet reported live from Coachella. The journalists represented media outlets such as Time, Billboard, and the BBC.

17. Petitioner also licenses the Coachella Marks to third parties in connection with the marketing and sale of a variety of goods. All such uses of the Coachella Marks inure and have inured to the benefit of Petitioner. Petitioner's licensing predates Respondent's priority dates by many years.

18. In addition to its common law rights, Petitioner owns a number of registrations for its Coachella Marks.

19. Petitioner owns United States Service Mark Registration No. 3,196,119 for COACHELLA for "Entertainment, namely, organizing and producing musical events" in International Class 41 ("the '119 Registration"). The '119 Registration is valid and subsisting on the Principal Register. The '119 Registration is incontestable.

20. Petitioner owns United States Trademark Registration No. 4,270,482 for COACHELLA for "Posters" in International Class 16, "Bottles, sold empty; Plastic water bottles sold empty" in International Class 21, and "Halter tops; Hooded sweatshirts; Long-sleeved shirts; Scarves; Shirts; T-shirts; Tank tops" in International Class 25 ("the '482 Registration"). The '482 Registration is valid and subsisting on the Principal Register. The '482 Registration is incontestable.

21. Petitioner owns United States Service Mark Registration No. 3,196,129 for COACHELLA (stylized) for "Entertainment, namely, organizing and producing musical events" in International Class 41 ("the '129 Registration"). The '129 Registration is valid and subsisting on the Principal Register. The '129 Registration is incontestable.

22. Petitioner owns United States Trademark Registration No. 4,266,400 for COACHELLA (stylized) for "Posters" in International Class 16 and for "Halter tops; Hooded sweatshirts; Long-sleeved shirts; Scarves; Shirts; T-shirts; Tank tops" in International Class 25

(“the ‘400 Registration”). The ‘400 Registration is valid and subsisting on the Principal Register. The ‘400 Registration is incontestable.

23. Petitioner owns United States Service Mark Registration No. 5,235,905 for COACHELLA for “Hotel accommodation services; Providing campground facilities” in International Class 43 (“the ‘905 Registration”). The ‘905 Registration is valid and subsisting on the Principal Register. The ‘905 Registration is incontestable.

24. Petitioner owns United States Service Mark Registration No. 5,235,903 for COACHELLA (stylized) for “Hotel accommodation services; Providing campground facilities” in International Class 43 (“the ‘903 Registration”). The ‘903 Registration is valid and subsisting on the Principal Register. The ‘903 Registration is incontestable.

25. Petitioner owns United States Service Mark Registration No. 3,196,128 for COACHELLA VALLEY MUSIC AND ARTS FESTIVAL for “Entertainment, namely, organizing and producing musical events” in International Class 41 (“the ‘128 Registration”). The ‘128 Registration is valid and subsisting on the Principal Register. The ‘128 Registration is incontestable.


26. Petitioner owns United States Trademark Registration No. 3,965,563 for COACHELLA VALLEY MUSIC & ARTS FESTIVAL for “Tote bags” in International Class 18 (“the ‘563 Registration”). The ‘563 Registration is valid and subsisting on the Principal Register. The ‘563 Registration is incontestable.

27. Petitioner owns United States Trademark Registration No. 4,008,651 for COACHELLA VALLEY MUSIC AND ARTS FESTIVAL for “Posters” in International Class 16 and “Halter tops; Hooded sweatshirts; Long-sleeved shirts; Scarves; Shirts; T-shirts; Tank tops”

in International Class 25 (“the ‘651 Registration”). The ‘651 Registration is valid and subsisting on the Principal Register. The ‘651 Registration is incontestable.

28. Petitioner owns United States Trademark Registration No. 5,075,233 for CHELLA for “Long-sleeved shirts; Shirts; T-shirts” in International Class 25 (“the ‘233 Registration”). The ‘233 Registration is valid and subsisting on the Principal Register. The ‘233 Registration is incontestable.

29. Petitioner owns United States Trademark Registration No. 5,520,063 for CHELLA for “Arranging, organizing, conducting, and hosting social entertainment events; Entertainment, namely, production of musical events; Organizing cultural and arts events” in International Class 41 (“the ‘063 Registration”). The ‘063 Registration is valid and subsisting on the Principal Register.

30. Petitioner owns United States Trademark Registration No. 7,196,158 for the Design  for “Entertainment in the nature of live performances by musicians, bands, and artists; Entertainment services in the nature of production of live performances, concerts, and musical events; Organizing exhibitions for artists” in International Class 41 (“the ‘158 Registration”). The ‘158 Registration is valid and subsisting on the Principal Register.

31. Petitioner has extensively used and marketed the Coachella Marks, and as a result, the Coachella Marks have achieved extensive recognition and are well known in the United States and worldwide.

32. Since long prior to Respondent’s filing date, Petitioner has continuously used the Coachella Marks in commerce, alone and in combination with other terms and designs, in connection with its goods and services.

33. Through the widespread use and advertising of its Coachella Marks over a long period of time and by virtue of the quality of goods and services sold in connection with the Coachella Marks, Petitioner has built up valuable goodwill and a reputation in connection with the Coachella Marks, both of which would be jeopardized by Respondent's continued use and registration of Respondent's Logo.

34. In addition, Petitioner has for years used distinctive design elements and/or trade dress in connection with Coachella comprising a Ferris wheel, which is a prominent feature of the Festival grounds, silhouettes or images of palm trees, images of the mountains surrounding the Coachella Valley, grass, and a gradient background, all of which have become closely associated in the minds of the public in connection with Petitioner and its Festival due to extensive advertising and media coverage.

35. Despite Petitioner's long prior common law and statutory rights in the Coachella Marks, and despite the renown of Petitioner's Coachella Marks, Respondent, with both actual and constructive notice of Petitioner's federal registrations and common law rights, filed an application for Respondent's Logo in International Class 32 for "Beer." The application for Respondent's Logo matured into the Respondent's Registration.

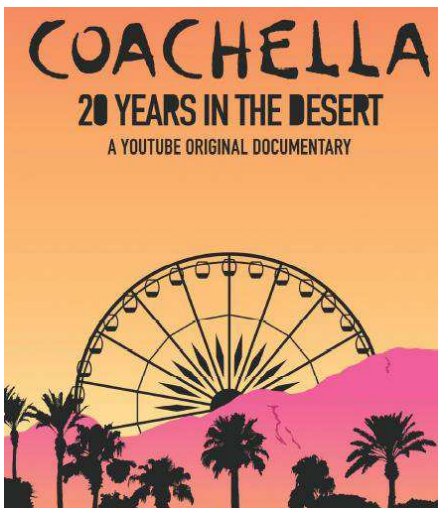
36. Respondent's Logo is highly likely to cause confusion, to cause mistake, or to deceive the relevant public that Respondent's goods are produced by, authorized by, sponsored by, approved by, or affiliated with Petitioner.

37. Respondent's logo is designed so that the "COACHELLA" portion of the design is approximately three times the size of the "VALLEY BREWING CO." portion, which makes the latter portion difficult to discern, particularly in small or low-resolution digital images and as the mark is depicted on the registration certificate.

38. Moreover, Respondent’s Logo incorporates a Ferris wheel, which is closely associated with Petitioner’s Festival and related goods and services because of the iconic Ferris wheel present on the Festival grounds. Respondent’s Logo incorporates the Ferris Wheel design in an intentional effort to associate the Respondent with Petitioner, despite there being no actual Ferris wheel present at Respondent’s brewery. Moreover, the Ferris wheel portion of Respondent’s Logo is also significantly larger than the “VALLEY BREWING CO.” portion of Respondent’s Logo, creating a logo that is dominated by “COACHELLA” and a Ferris wheel design.

39. Respondent also uses Respondent’s Logo in connection with various indicia of the Festival and/or Petitioner’s trade dress, thus both drawing a further association and demonstrating Respondent’s intent to draw such a false association. This attempt to draw a false association is amply demonstrated by a simple side-by-side comparison of the parties’ respective promotional materials, as depicted below:

Petitioner’s Advertising



Example of Respondent’s Beer Label



Petitioner’s 2019 Coachella Poster



Respondent’s Comedy Fest Poster



These are but two examples of Respondent’s promotional materials that imitate Petitioner’s own.

40. As an additional example of Respondent’s intentional attempts to draw a false association between itself on the one hand and Petitioner and the Festival on the other hand, the specimen submitted to the USPTO during prosecution of Respondent’s Logo constitutes a beer can covered in musical notes and bearing two guitars in addition to Respondent’s Logo. Nothing about the variety of beer depicted in the specimen has anything to do with music, but Respondent demonstrates an intent to create a false association with Coachella, which is known worldwide for live music events, by otherwise inexplicably combining those elements with Respondent’s Logo.

41. Respondent’s Logo so resembles Petitioner’s Coachella Marks, previously used in commerce and/or registered by Petitioner and not abandoned, as to be likely, when applied to the goods of Respondent (and in particular when intentionally used in connection with Festival indicia), to cause confusion, to cause mistake, or to deceive. The continued registration of Respondent’s Logo, as shown in Respondent’s Registration, would therefore damage Petitioner.

42. Further exacerbating this false association are both the fact that Petitioner sells beer and other alcoholic beverages at its Festival and the fact that Petitioner has entered into sponsorship agreements with beverage makers such as Absolut, Heineken, Aperol Spritz, White Claw, and Coca-Cola. Thus, consumers are likely to believe that Respondent's goods are produced by, sponsored by, affiliated with, or endorsed by Petitioner.

43. Respondent's alleged use in the United States of the Respondent's Logo in connection with the goods listed in the Respondent's Registration is creating a false association via a false suggestion of a connection between Respondent and Petitioner. As designed, Respondent's Logo is nearly identical to Petitioner's Coachella Marks and Festival indicial/distinctive trade dress and would be recognized as such by the consuming public. Thus, Respondent's Logo points uniquely and unmistakably to Petitioner, despite the fact that Petitioner is not connected with Respondent or with Respondent's goods or services. Finally, Petitioner's Coachella Marks are widely recognized globally and have achieved renown such that, when Respondent's Logo is used with beer, and in particular when done so in connection with indicia of Petitioner's Festival and/or trade dress, a connection with Petitioner would be presumed.

44. As additional bases for cancellation and based on Petitioner's investigation, Respondent's Registration should be canceled both for fraud on the USPTO and because the underlying application is void *ab initio*.

45. Respondent's Registration was obtained via fraud because Respondent stated to the USPTO that the mark was in use in interstate commerce in its use-based application, despite explicitly stating on its website that it offers its beer only for "shipment within California." Moreover, Respondent never received a Certificate of Label Approval (COLA) from the Alcohol and Tobacco Tax and Trade Bureau, which is legally required for any alcoholic products that enter

interstate commerce. Both of these facts support a finding that Respondent does not use its mark in interstate commerce, in direct contradiction of its statement to the USPTO. The statement to the USPTO was made under oath and was made with full knowledge of the actual facts and thus with, on information and belief, was made with an intent to deceive the USPTO into issuing the registration to which Respondent was not entitled. Further, this was a material misstatement, as the USPTO relied on the statement in issuing the registration and would not have issued the registration had the USPTO known of the statement's falsity.

46. In addition, the application that matured into the Respondent's Registration is void *ab initio* and therefore should never have matured into a registration because Respondent's Logo was not used in commerce as of the filing date of the use-based application that matured into Respondent's Registration and, indeed, has never been used on beer in interstate commerce, as demonstrated by the facts in the immediately preceding paragraph.

47. If Respondent's Registration, which is both invalid due to fraud and being void *ab initio*, is allowed to remain on the register, false association, fraud on the public and the USPTO, harm to Petitioner's Coachella Marks and reputation, and/or other injury to Petitioner will continue to occur.

WHEREFORE, Petitioner requests that this Petition for Cancellation be granted and that Registration No. 6,401,647 be cancelled in its entirety.

Respectfully submitted,

TUCKER ELLIS, LLP

Date: April 22, 2024

By: /s/Steven E. Lauridsen

David J. Steele
Steven E. Lauridsen
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Martin J. Yi

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