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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

GUCCI AMERICA, INC., a New York Corporation

Plaintiff,

vs.

CASSANDRA BLACK, individually, d/b/a CECE'S BARGAIN BOUTIQUE and d/b/a CECESBARGAINBOUTIQUE.COM and DOES 1-10,

Defendant.

Case No.:

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

Plaintiff, GUCCI AMERICA, INC., a New York corporation ("Gucci") hereby sues Defendants, Cassandra Black, individually d/b/a CeCe's Bargain Boutique d/b/a cecesbargainboutique.com ("Black") and DOES 1 – 10 (collectively "Defendants") and alleges as follows:

JURISDICTION AND VENUE

1. This is an action pursuant to (i) 15 U.S.C. §§ 1114, 1116, 1121 and 1125(a). Accordingly, this Court has jurisdiction under 28 U.S.C. §§ 1331 and 1338. Venue is proper in this Court pursuant 28 U.S.C. § 1391 since the named Defendants conduct business with

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

MERCHANT & GOULD
701 Fifth Avenue, Suite 4100
Seattle, Washington 98104
Tel: (206) 342-6200 / Fax: (206) 342-6201

1 consumers within this Judicial District through at least the fully interactive Internet website
2 cecesbargainboutique.com.

3 **THE PARTIES**

4 2. Gucci is a corporation duly organized under the laws of the State of New York
5 with its principal place of business in the United States located at 658 Fifth Avenue, New York,
6 New York 10022. Gucci is, in part, engaged in the business of manufacturing and distributing
7 throughout the world, including within this Judicial District, high quality handbags and wallets
8 under the Federally registered trademarks GUCCI, NON-INTERLOCKING GG MONOGRAM,
9 INTERLOCKING GG MONOGRAM, REPEATING GG MONOGRAM, FACING GG
10 MONOGRAM, and G MONOGRAM (collectively the "Gucci Marks").
11

12 3. Black is an individual who, upon information and belief conducts business within
13 this Judicial District through the aliases "CeCe's Bargain Boutique" and
14 "cecesbargainboutique.com." Upon information and belief Black resides at 22520 125th Place,
15 S.E., Kent, WA 98031 and conducts business within this Judicial District through the operation
16 of the fully interactive website, cecesbargainboutique.com. Black is the moving and conscious
17 force behind the operation of cecesbargainboutique.com.
18

19 4. Upon information and belief, Black is directly and personally engaging in the sale
20 of counterfeit and infringing products within this District as alleged herein.

21 5. Defendant Does 1-5 are, upon information and belief, individuals who reside
22 and/or conduct substantial business within this Judicial District. Further, Does 1-5 are directly
23 and personally contributing, inducing and engaging in the sale of counterfeit products as alleged
24 herein as partners or suppliers to the named Defendants. Gucci is presently unaware of the true
25

26 COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

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1 names of Does 1-5. Gucci will amend this Complaint upon discovery of the identities of such
2 fictitious Defendants.

3 6. Defendant Does 6-10 are business entities which, upon information and belief,
4 reside and/or conduct business within this Judicial District. Moreover, Does 6-10 are, upon
5 information and belief, directly engaging in the sale of counterfeit products as alleged herein as
6 partners or suppliers to the named Defendants. Gucci is presently unaware of the true names of
7 Does 6-10. Gucci will amend this Complaint upon discovery of the identities of such fictitious
8 Defendants.
9

10 **COMMON FACTUAL ALLEGATIONS**

11 7. Gucci is the owner of the following United States Federal Trademark
12 Registrations; copies of which are attached to this complaint as Exhibits 1-15:

<u>Mark</u>	<u>Registration No.</u>	<u>Registration Date</u>
SQUARE G MONOGRAM	2,042,805	March 11, 1997
NON-INTERLOCKING GG MONOGRAM DESIGN	1,107,311	November 28, 1978
GUCCI	0,876,292	September 9, 1969
GUCCI (SYTLIZED)	3,061,918	February 28, 2006
FACING GG MONOGRAM	3,039,630	January 10, 2006
REPEATING GG DESIGN	3,072,549	March 28, 2006
ROUNDED G MONOGRAM	3,052,779	January 31, 2006

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1	ELONGATED INTERLOCKING GG MONOGRAM	3,376,129	January 29, 2008
2			
3	NON-INTERLOCKING GG MONOGRAM DESIGN	3,378,755	February 5, 2008
4			
5	ROUNDED INTERLOCKING GG MONOGRAM	3,391,739	December 18, 2007
6			
7	BAMBOO HORSEBIT DESIGN	3,243,972	May 22, 2007
8			
9	HALF HORSEBIT DESIGN	3,238,962	May 8, 2007
10			
11	TWO TONE HORSEBIT DESIGN	3,274,316	August 7, 2007
12			
13	REPEATING HORSEBIT DESIGN	3,274,315	August 7, 2007
14			
15	GREEN RED GREEN STRIPE DESIGN	1,122,780	July 24, 1979

16 which are registered in International Class 18 and are used in connection with the manufacture
17 and distribution of, among other things, high quality handbags and wallets.

18 8. The Gucci Marks have been used in interstate commerce to identify and
19 distinguish Gucci's high quality handbags and wallets and other goods for an extended period of
20 time.

21 9. The Gucci Marks have never been assigned or licensed to any of the Defendants
22 in this matter.

23 10. The Gucci Marks are symbols of Gucci's quality, reputation and goodwill and
24 have never been abandoned.

1 11. Further, Gucci has expended substantial time, money and other resources
2 developing, advertising and otherwise promoting the Gucci Marks. The Gucci Marks qualify as
3 famous marks as that term is used in 15 U.S.C. §1125(c)(1).

4 12. Gucci has extensively used, advertised and promoted the Gucci Marks in the
5 United States in association with the sale of high quality handbags and wallets and other goods
6 and has carefully monitored and policed the use of the Gucci Marks.

7 13. As a result of Gucci's efforts, members of the consuming public readily identify
8 merchandise bearing the Gucci Marks, as being high quality merchandise sponsored and
9 approved by Gucci.

10 14. Accordingly, the Gucci Marks have achieved secondary meaning as identifiers of
11 high quality handbags and wallets and other goods.

12 15. Upon information and belief, at all times relevant hereto, the Defendants in this
13 action had full knowledge of Gucci's ownership of the Gucci Marks, including its exclusive right
14 to use and license such intellectual property and the goodwill associated therewith.

15 16. Gucci has discovered the Defendants are promoting and otherwise advertising,
16 distributing, selling and/or offering for sale counterfeit products, including at least handbags and
17 wallets bearing trademarks which are exact copies of one or more of the Gucci Marks (the
18 "Counterfeit Goods"). Specifically, upon information and belief, the Defendants are using one
19 or more of the Gucci Marks in the same stylized fashion, for different quality goods.

20 17. Upon information and belief, the Defendants' Counterfeit Goods are of a quality
21 substantially different than that of Gucci's genuine goods. Despite the nature of their Counterfeit
22 Goods and the knowledge they are without authority to do so, the Defendants, upon information
23 and belief, are actively using, promoting and otherwise advertising, distributing, selling and/or
24

1 offering for sale substantial quantities of their Counterfeit Goods with the knowledge that such
2 goods will be mistaken for the genuine high quality products offered for sale by Gucci. The net
3 effect of the Defendants' actions will be to result in the confusion of consumers who will believe
4 the Defendants' Counterfeit Goods are genuine goods originating from and approved by Gucci.

5 18. The Defendants advertise their Counterfeit Goods for sale to the consuming
6 public. In so advertising these products, the Defendants use one or more of the Gucci Marks.
7 Indeed, the Defendants herein misappropriated Gucci's advertising ideas and entire style of
8 doing business with regard to the advertisement and sale of Gucci's genuine products. Upon
9 information and belief, the misappropriation of Gucci's advertising ideas in the form of one or
10 more of the Gucci Marks has occurred, in part, in the course of Defendants' advertising activities
11 and has been the proximate cause of damage to Gucci.

12 19. Upon information and belief, the Defendants are conducting their counterfeiting
13 and infringing activities at least within this Judicial District and elsewhere throughout the United
14 States. As a result, the Defendants are defrauding Gucci and the consuming public for the
15 Defendants' own benefit. Defendants' infringement and disparagement of Gucci does not
16 simply amount to the wrong description of their goods or the failure of the goods to conform to
17 the advertised quality or performance.

18 20. The Defendants' use of one or more of the Gucci Marks, including the promotion
19 and advertising, reproduction, distribution, sale and offering for sale of their Counterfeit Goods,
20 is without Gucci's consent or authorization.

21 21. Further, the Defendants are engaging in the above-described illegal counterfeiting
22 and infringing activities knowing and intentionally or with reckless disregard or willful blindness
23 to Gucci's rights for the purpose of trading on the goodwill and reputation of Gucci. If the
24
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1 Defendants' intentional counterfeiting and infringing activities are not preliminarily and
2 permanently enjoined by this Court, Gucci and the consuming public will continue to be
3 damaged.

4 22. The Defendants' above identified infringing activities are likely to cause
5 confusion, deception and mistake in the minds of consumers, the public and the trade.
6 Moreover, the Defendants' wrongful conduct is likely to create a false impression and deceive
7 customers, the public and the trade into believing there is a connection or association between
8 Gucci's genuine goods and the Defendants' Counterfeit Goods.

9
10 23. Gucci has no adequate remedy at law.

11 24. Gucci is suffering irreparable injury and has suffered substantial damages as a
12 result of the Defendants' counterfeiting and infringing activities.

13 25. The injuries and damages sustained by Gucci have been directly and proximately
14 caused by the Defendants' wrongful reproduction, use, advertisement, promotion, offering to
15 sell, and sale of their Counterfeit Goods.

16 26. Gucci has retained the undersigned counsel to represent them in this matter and is
17 obligated to pay said counsel a reasonable fee for such representation.

18 **COUNT I - TRADEMARK COUNTERFEITING AND INFRINGEMENT**

19 27. Gucci hereby readopts and re-alleges the allegations set forth in Paragraphs 1
20 through 26 above.

21
22 28. This is an action for trademark counterfeiting and infringement against the
23 Defendants based on their promotion, advertisement, distribution, sale and/or offering for sale of
24 the Counterfeit Goods bearing one or more of the Gucci Marks.

1 29. Specifically, the Defendants are promoting and otherwise advertising, selling,
2 offering for sale and distributing counterfeit and infringing handbags and wallets bearing one or
3 more of the Gucci Marks. The Defendants are continuously infringing and inducing others to
4 infringe one or more of the Gucci Marks by using them to advertise, promote and sell counterfeit
5 handbags and wallets.

6 30. Defendants' counterfeiting and infringing activities are likely to cause and
7 actually are causing confusion, mistake and deception among members of the trade and the
8 general consuming public as to the origin and quality of Defendants' Counterfeit Goods bearing
9 one or more of the Gucci Marks.

10 31. The Defendants' unlawful actions have caused and are continuing to cause
11 unquantifiable damages to Gucci.

12 32. Defendants' above-described illegal actions constitute counterfeiting and
13 infringement of one or more of the Gucci Marks in violation of Gucci's rights under § 32 of the
14 Lanham Act, 15 U.S.C. § 1114.

15 33. Gucci has suffered and will continue to suffer irreparable injury due to the above
16 described activities of the Defendants if the Defendants are not preliminarily and permanently
17 enjoined.
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20 **COUNT II - FALSE DESIGNATION OF ORIGIN**

21 **PURSUANT TO § 43(a) OF THE LANHAM ACT**

22 34. Gucci hereby readopts and re-alleges the allegations set forth in Paragraphs 1
23 through 26 above.

24 35. The Defendants' Counterfeit Goods bearing and sold under one or more of the
25 Gucci Marks have been widely advertised and distributed throughout the United States.

26
27 COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

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701 Fifth Avenue, Suite 4100
Seattle, Washington 98104
Tel: (206) 342-6200 / Fax: (206) 342-6201

1 36. The Defendants' Counterfeit Goods bearing and sold under one or more of the
2 Gucci Marks are virtually identical in appearance to each of Gucci's respective genuine goods.
3 However, the Counterfeit Goods are different and likely inferior in quality. Accordingly, the
4 Defendants' activities are likely to cause confusion in the trade and among the general public as
5 to at least the origin or sponsorship of the Counterfeit Goods.

6 37. The Defendants, upon information and belief, have used in connection with their
7 sale of Counterfeit Goods, false designations of origins and false descriptions and
8 representations, including words or other symbols and trade dress which tend to falsely describe
9 or represent such goods and have caused such goods to enter into commerce with full knowledge
10 of the falsity of such designations of origin and such descriptions and representations, all to the
11 detriment of Gucci.

12 38. Specifically, the Defendants have authorized an infringing use of one or more of
13 the Gucci Marks, in the Defendants' advertisement and promotion of their counterfeit and
14 infringing handbags and wallets. The Defendants, have misrepresented to members of the
15 consuming public that the Counterfeit Goods being advertised and sold by them are genuine,
16 non-infringing products.

17 39. The Defendants' above-described actions are in violation of Section 43(a) of the
18 Lanham Act, 15 U.S.C. §1125(a).

19 40. Gucci has sustained injury and damage caused by Defendants' conduct, and
20 absent an entry of an injunction by this Court, Gucci will continue to suffer irreparable injury to
21 their goodwill and business reputation as well as monetary damages.
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26 COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

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1 **PRAYER FOR RELIEF**

2 41. WHEREFORE, Gucci demands judgment jointly and severally against the
3 Defendants as follows:

4 a. The Court enter a preliminary and permanent injunction enjoining
5 Defendants, their agents, representatives, servants, employees, and all those acting in concert or
6 participation therewith, from manufacturing or causing to be manufactured, importing,
7 advertising or promoting, distributing, selling or offering to sell their Counterfeit Goods; from
8 infringing, counterfeiting, or diluting any of the Gucci Marks; from using any of the Gucci
9 Marks, or any mark or trade dress similar thereto, in connection with the sale of any
10 unauthorized goods; from using any logo, trade name or trademark or trade dress which may be
11 calculated to falsely advertise the services or products of the Defendants as being sponsored by,
12 authorized by, endorsed by, or in any way associated with Gucci; from falsely representing
13 themselves as being connected with Gucci, through sponsorship or association, or engaging in
14 any act which is likely to falsely cause members of the trade and/or of the purchasing public to
15 believe any goods or services of the Defendants, or in any way endorsed by, approved by, and/or
16 associated with Gucci; from using any reproduction, counterfeit, copy, or colorable imitation of
17 any of the Gucci Marks in connection with the publicity, promotion, sale, or advertising of any
18 goods sold by the Defendants, including, without limitation, handbags and wallets, and other
19 goods; from affixing, applying, annexing or using in connection with the sale of any goods, a
20 false description or representation, including words or other symbols tending to falsely describe
21 or represent Defendants' goods as being those of Gucci, or in any way endorsed by Gucci and
22 from offering such goods in commerce; and from otherwise unfairly competing with Gucci.
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b. The Defendants be required to account to and pay Gucci for all profits and damages resulting from Defendants' trademark infringing and counterfeiting activities and that the award to Gucci be trebled, as provided for under 15 U.S.C. §1117, or, at Gucci's election with respect to Count I, that Gucci be awarded statutory damages from each Defendants in the amount of one million dollars (\$1,000,000.00) per each counterfeit Gucci Mark used and product sold, as provided by 15 U.S.C. §1117(c)(2) of the Lanham Act.

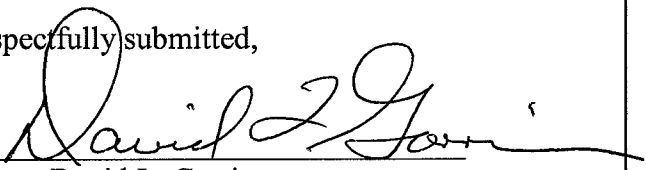
c. Gucci be awarded punitive damages.

d. Gucci be awarded pre-judgment interest on its respective judgment.

e. Gucci be awarded its costs and reasonable attorneys' fees and investigators' fees associated with bringing this action.

f. Gucci be awarded such other and further relief as the Court may deem just and proper.

DATED this 27th day of May, 2008.

Respectfully submitted,
By: 

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Attorneys for PLAINTIFF
GUCCI AMERICA, INC.,
a New York corporation

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

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Int. Cls.: 18 and 25

Prior U.S. Cls.: 1, 2, 3, 22, 39 and 41

Reg. No. 2,042,805

United States Patent and Trademark Office

Registered Mar. 11, 1997

**TRADEMARK
PRINCIPAL REGISTER**



GUCCI AMERICA, INC. (NEW YORK CORPORATION)
685 FIFTH AVENUE
NEW YORK, NY 10022

FOR: HANDBAGS, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).
FIRST USE 10-0-1994; IN COMMERCE 3-0-1995.

FOR: BELTS, GLOVES, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 10-0-1994; IN COMMERCE 3-0-1995.

OWNER OF U.S. REG. NOS. 1,106,722, 1,920,895 AND OTHERS.

SER. NO. 74-709,786, FILED 8-1-1995.

ANDREW LAWRENCE, EXAMINING ATTORNEY

Int. Cl.: 18

Prior U.S. Cl.: 3, 26, 41

United States Patent and Trademark Office

Reg. No. 1,107,311
Registered Nov. 28, 1978

TRADEMARK
Principal Register



Gucci Shops Inc. (New York corporation)
689 5th Ave.
New York, N.Y. 10022

For: **WALLETS, PURSES, HANDBAGS, SHOULDER BAGS, CLUTCH BAGS, TOTE BAGS, CARD CASES, PARTLY AND WHOLLY OF LEATHER, KEY CASES, PASSPORT CASES, COSMETIC CASES, ATTACHE CASES, VALISES, SUITCASES, DUFFLES,**

NECKTIE CASES; UMBRELLAS, SADDLES, BRIDLES, WALKING STICKS, AND CANES, in CLASS 18 (U.S. CLS. 3, 26, and 41).

First use March 1966; in commerce March 1966.

Ser. No. 146,457, filed Oct. 28, 1977.

V. T. HARFORD, JR., Examiner

PRINCIPAL REGISTER Trademark

Ser. No. 300,192. filed June 11, 1968

GUCCI

Gucci Shops Inc., (New York corporation)
699 5th Ave.
New York, N.Y. 10022

For: VACUUM BOTTLES, COMPACTS SOLD
EMPTY AND VANITY CASES SOLD EMPTY, in
CLASS 2.

For: POCKETBOOKS, WALLETS, TRAVEL AND
DUFFEL BAGS, ATTACHE CASES, TOILET CASES
SOLD EMPTY AND SHOE BAGS, in CLASS 3 (INT.
CL. 18).

For: DESK SETS INCLUDING BLOTTERS, DESK
PADS, LETTER OPENERS, PENCIL HOLDERS,
AND A LEATHER TRAY, in CLASS 37 (INT. CL. 16).

For: SHOES AND BOOTS, in CLASS 39 (INT. CL.
25).

For: UMBRELLAS, in CLASS 41 (INT. CL. 18).

First use Dec. 20, 1953; in commerce Dec. 20, 1953.

Int. Cl.: 18

Prior U.S. Cls.: 1, 2, 3, 22 and 41

United States Patent and Trademark Office

Reg. No. 3,061,918

Registered Feb. 28, 2006

**TRADEMARK
PRINCIPAL REGISTER**



GUCCI AMERICA, INC. (NEW YORK CORPORATION)
685 FIFTH AVENUE
NEW YORK, NY 10022

FOR: WALLET, PURSES, HANDBAGS,
SHOULDER BAGS, CLUTCH BAGS, TOTE BAGS,
DUFFEL BAGS, BUSINESS CARD CASES, CALLING
CARD CASES, CREDIT CARD CASES, NAME CARD
CASES, KEY CASES AND ATTACHE CASES, IN
CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FIRST USE 0-0-1967; IN COMMERCE 0-0-1967.

OWNER OF U.S. REG. NO. 876,292 AND OTHERS.

SER. NO. 76-629,211, FILED 1-28-2005.

TOMAS V. VLCEK, EXAMINING ATTORNEY

Int. Cl.: 18

Prior U.S. Cls.: 1, 2, 3, 22 and 41

United States Patent and Trademark Office

Reg. No. 3,039,630

Registered Jan. 10, 2006

**TRADEMARK
PRINCIPAL REGISTER**



GUCCI AMERICA, INC. (NEW YORK CORPORATION)
685 FIFTH AVENUE
NEW YORK, NY 10022

FOR: WALLET, PURSES, HANDBAGS, TOTE BAGS, BUSINESS CARD CASES, CREDIT CARD CASES AND KEY CASES, PARTLY OR WHOLLY OF LEATHER, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FIRST USE 9-0-2002; IN COMMERCE 9-0-2002.

OWNER OF U.S. REG. NO. 1,158,170.

SER. NO. 76-621,230, FILED 11-17-2004.

AMOS T. MATTHEWS, JR., EXAMINING ATTORNEY

Int. Cl.: 18

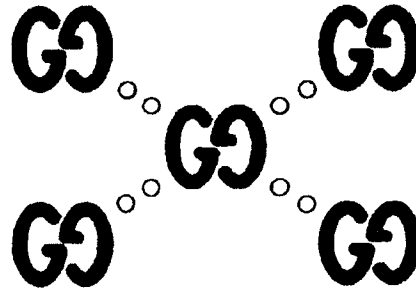
Prior U.S. Cls.: 1, 2, 3, 22 and 41

United States Patent and Trademark Office

Reg. No. 3,072,549

Registered Mar. 28, 2006

**TRADEMARK
PRINCIPAL REGISTER**



GUCCI AMERICA, INC. (NEW YORK CORPORATION)

685 FIFTH AVENUE
NEW YORK, NY 10022

FOR: WALLETS, PURSES, HANDBAGS, SHOULDER BAGS, CLUTCH BAGS, TOTE BAGS, BUSINESS CARD CASES, CREDIT CARD CASES, PARTLY AND WHOLLY OF LEATHER, KEY CASES, COSMETIC CASES SOLD EMPTY, BRIEF-CASES, ATTACHÉ CASES, VALISES, SUITCASES

AND DUFFLES, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FIRST USE 3-0-1966; IN COMMERCE 3-0-1966.

OWNER OF U.S. REG. NOS. 1,106,722, 2,680,237 AND OTHERS.

SER. NO. 76-611,519, FILED 9-15-2004.

ELISSA GARBER KON, EXAMINING ATTORNEY

Int. Cl.: 18

Prior U.S. Cls.: 1, 2, 3, 22 and 41

United States Patent and Trademark Office

Reg. No. 3,052,779

Registered Jan. 31, 2006

**TRADEMARK
PRINCIPAL REGISTER**



**GUCCI AMERICA, INC. (NEW YORK CORPORATION)
685 FIFTH AVENUE
NEW YORK, NY 10022**

FIRST USE 1-0-2004; IN COMMERCE 1-0-2004.

**OWNER OF U.S. REG. NOS. 2,042,805, 2,369,842
AND OTHERS.**

**FOR: WALLET, PURSES, HANDBAGS,
SHOULDER BAGS, CLUTCH BAGS, TOTE BAGS,
DUFFEL BAGS, BUSINESS CARD CASES, CREDIT
CARD CASES, KEY CASES, AND ATTACHÉ CASES,
IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).**

SER. NO. 76-628,522, FILED 1-21-2005.

TRACY FLETCHER, EXAMINING ATTORNEY

Int. Cls.: 6 and 18

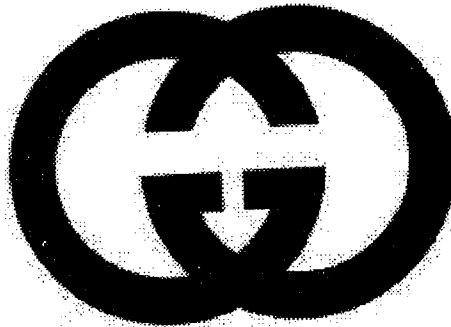
Prior U.S. Cls.: 1, 2, 3, 12, 13, 14, 22, 23, 25, 41 and 50

Reg. No. 3,376,129

United States Patent and Trademark Office

Registered Jan. 29, 2008

**TRADEMARK
PRINCIPAL REGISTER**



GUCCI AMERICA, INC. (NEW YORK CORPORATION)
685 FIFTH AVENUE
NEW YORK, NY 10022

FOR: KEY RINGS MADE OF METAL, METAL KEY RINGS COVERED IN LEATHER, AND METAL KEY RINGS PARTIALLY COVERED WITH ENAMEL, IN CLASS 6 (U.S. CLS. 2, 12, 13, 14, 23, 25 AND 50).

FIRST USE 6-0-2006; IN COMMERCE 6-0-2006.

FOR: WALLET, PURSES, HANDBAGS, SHOULDER BAGS, CLUTCH BAGS, TOTE BAGS, BUSINESS CARD CASES, CREDIT CARD CASES,

PARTLY AND WHOLLY OF LEATHER, KEY CASES, COSMETIC CASES SOLD EMPTY, BRIEFCASES, ATTACHÉ CASES, VALISES, SUITCASES AND DUFFLES, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FIRST USE 2-0-1976; IN COMMERCE 2-0-1976.

OWNER OF U.S. REG. NOS. 1,127,167, 1,158,170, AND 1,464,522.

SER. NO. 78-973,795, FILED 9-13-2006.

WILLIAM ROSSMAN, EXAMINING ATTORNEY

Int. Cls.: 9, 14, 16, 18 and 25

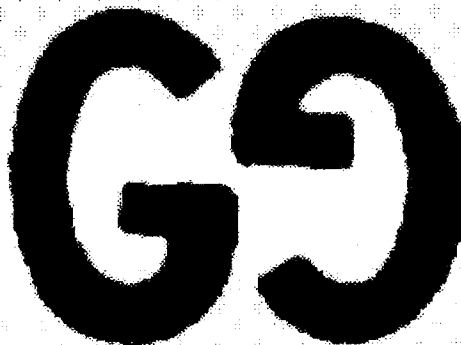
Prior U.S. Cls.: 1, 2, 3, 5, 21, 22, 23, 26, 27, 28, 29, 36,
37, 38, 39, 41 and 50

Reg. No. 3,378,755

Registered Feb. 5, 2008

United States Patent and Trademark Office

**TRADEMARK
PRINCIPAL REGISTER**



GUCCI AMERICA, INC. (NEW YORK CORPORATION)
685 FIFTH AVENUE
NEW YORK, NY 10022

FOR: EYEGLASS FRAMES AND SUNGLASSES,
IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 8-0-2001; IN COMMERCE 8-0-2001.

FOR: JEWELRY, WATCHES AND CLOCKS, IN
CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).

FIRST USE 8-0-2001; IN COMMERCE 8-0-2001.

FOR: ADDRESS BOOKS, AGENDAS, NOTE-
BOOKS, STATIONARY IN THE FORM OF WRITING
PAPER AND PENS, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23,
29, 37, 38 AND 50).

FIRST USE 3-0-1966; IN COMMERCE 3-0-1966.

FOR: WALLETS, PURSES, HANDBAGS,
SHOULDER BAGS, CLUTCH BAGS, TOTE BAGS,

BUSINESS CARD CASES, CREDIT CARD CASES,
PARTLY AND WHOLLY OF LEATHER, KEY
CASES, COSMETIC CASES SOLD EMPTY, BRIEF-
CASES, ATTACHÉ CASES, VALISES, SUITCASES
AND DUFFLES, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22
AND 41).

FIRST USE 3-0-1966; IN COMMERCE 3-0-1966.

FOR: SCARVES, BELTS, FOOTWEAR, SHIRTS,
SWEATERS, COATS, SUITS, DRESSING GOWNS
AND DRESSES, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 3-0-1966; IN COMMERCE 3-0-1966.

OWNER OF U.S. REG. NOS. 1,106,722, 3,072,547
AND OTHERS.

SER. NO. 78-973,737, FILED 9-13-2006.

WILLIAM ROSSMAN, EXAMINING ATTORNEY

Int. Cl.: 9

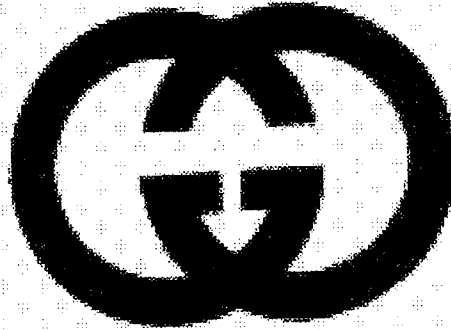
Prior U.S. Cls.: 21, 23, 26, 36 and 38

United States Patent and Trademark Office

Reg. No. 3,391,739

Registered Mar. 4, 2008

**TRADEMARK
PRINCIPAL REGISTER**



GUCCI AMERICA, INC. (NEW YORK CORPORATION)
685 FIFTH AVENUE
NEW YORK, NY 10022

OWNER OF U.S. REG. NOS. 1,127,167, 1,158,170,
AND 1,464,522.

FOR: EYEGLOSS FRAMES AND SUNGLASSES,
IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

SER. NO. 77-267,948, FILED 8-30-2007.

FIRST USE 11-0-2006; IN COMMERCE 11-0-2006.

SUSAN STIGLITZ, EXAMINING ATTORNEY

Int. Cls.: 18 and 25

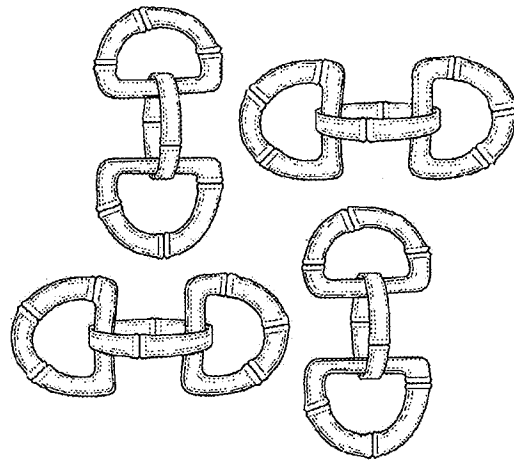
Prior U.S. Cls.: 1, 2, 3, 22, 39 and 41

United States Patent and Trademark Office

Reg. No. 3,243,972

Registered May 22, 2007

TRADEMARK
PRINCIPAL REGISTER



GUCCI AMERICA, INC. (NEW YORK CORPORATION)
685 FIFTH AVENUE
NEW YORK, NY 10022

FOR: WALLETS, HANDBAGS, TOTE BAGS AND SHOULDER BAGS, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FIRST USE 11-1-2005; IN COMMERCE 11-1-2005.

FOR: SCARVES, HATS AND SHOES, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 11-1-2005; IN COMMERCE 11-1-2005.

THE STIPPLING IS FOR SHADING PURPOSES.

THE MARK CONSISTS OF DESIGN OF HORSEBIT IN A REPEATING PATTERN.

SEC. 2(F).

SER. NO. 78-765,861, FILED 12-2-2005.

PAMELA HIRSCHMAN, EXAMINING ATTORNEY

Int. Cls.: 18 and 25

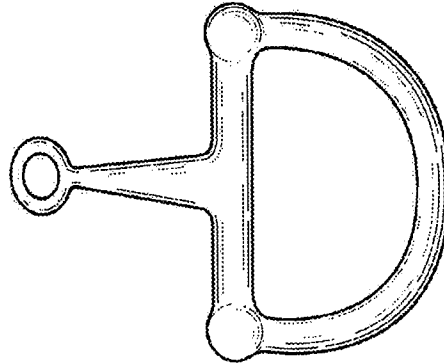
Prior U.S. Cls.: 1, 2, 3, 22, 39 and 41

United States Patent and Trademark Office

Reg. No. 3,238,962

Registered May 8, 2007

**TRADEMARK
PRINCIPAL REGISTER**



GUCCI AMERICA, INC. (NEW YORK CORPORATION)
685 FIFTH AVENUE
NEW YORK, NY 10022

FOR: WALLETS, PURSES, HANDBAGS, SHOULDER BAGS, CLUTCH BAGS, TOTE BAGS, CREDIT CARD CASES, COSMETIC CASES SOLD EMPTY, ATTACHÉ CASES, VALISES, SUITCASES, DUFFEL BAGS, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FIRST USE 2-0-2004; IN COMMERCE 2-0-2004.

FOR: CLOTHING, NAMELY, NECKTIES, SCARVES, BELTS, SHIRTS, SWEATERS, COATS,

SUITS, DRESSING GOWNS, DRESSES, HATS AND FOOTWEAR, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 2-0-2004; IN COMMERCE 2-0-2004.

OWNER OF U.S. REG. NOS. 2,037,683 AND 2,885,501.

THE MARK CONSISTS OF A STYLIZED, THREE-DIMENSIONAL IMAGE OF ONE-HALF OF A HORSE BIT.

SER. NO. 78-678,214, FILED 7-26-2005.

MIDGE BUTLER, EXAMINING ATTORNEY

Int. Cls.: 18 and 25

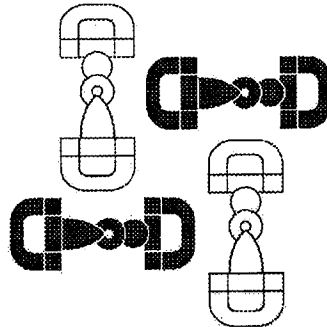
Prior U.S. Cls.: 1, 2, 3, 22, 39 and 41

United States Patent and Trademark Office

Reg. No. 3,274,316

Registered Aug. 7, 2007

**TRADEMARK
PRINCIPAL REGISTER**



GUCCI AMERICA, INC. (NEW YORK CORPORATION)
685 FIFTH AVENUE
NEW YORK, NY 10022

FOR: WALLETTS, PURSES, HANDBAGS, SHOULDER BAGS, CLUTCH BAGS, TOTE BAGS, VALISES, SUITCASES AND DUFFEL BAGS, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FIRST USE 8-0-2005; IN COMMERCE 8-0-2005.

FOR: SCARVES, BELTS, FOOTWEAR, SHIRTS, SWEATERS, COATS, SUITS, DRESSING GOWNS AND DRESSES, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 8-0-2005; IN COMMERCE 8-0-2005.

THE MARK CONSISTS OF A REPEATING PATTERN OF TWO-TONED, STYLIZED IMAGES OF HORSE BITS.

SEC. 2(F).

SER. NO. 78-661,151, FILED 6-29-2005.

RENEE SERVANCE, EXAMINING ATTORNEY

Int. Cls.: 18 and 25

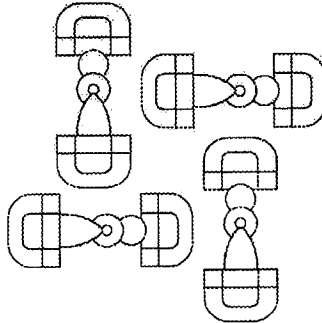
Prior U.S. Cls.: 1, 2, 3, 22, 39 and 41

United States Patent and Trademark Office

Reg. No. 3,274,315

Registered Aug. 7, 2007

**TRADEMARK
PRINCIPAL REGISTER**



GUCCI AMERICA, INC. (NEW YORK CORPORATION)
685 FIFTH AVENUE
NEW YORK, NY 10022

FOR: WALLETTS, PURSES, HANDBAGS, SHOULDER BAGS, CLUTCH BAGS, TOTE BAGS, VALISES, SUITCASES AND DUFFEL BAGS, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FIRST USE 8-0-2005; IN COMMERCE 8-0-2005.

FOR: SCARVES, BELTS, FOOTWEAR, SHIRTS, SWEATERS, COATS, SUITS, DRESSING GOWNS AND DRESSES, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 8-0-2005; IN COMMERCE 8-0-2005.

THE MARK CONSISTS OF A REPEATING PATTERN OF STYLIZED IMAGES OF HORSE BITS.

SEC. 2(F).

SER. NO. 78-661,141, FILED 6-29-2005.

TRACY WHITTAKER-BROWN, EXAMINING ATTORNEY

Int. Cl.: 18

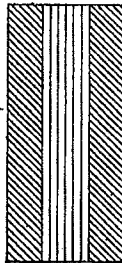
Prior U.S. Cl.: 3, 41

United States Patent and Trademark Office

Reg. No. 1,122,780
Registered July 24, 1979

TRADEMARK

Principal Register



Gucci Shops Inc. (New York corporation)
689 5th Ave.
New York, N.Y. 10022

For: WALLETS, PURSES, HANDBAGS, SHOULDER BAGS, CLUTCH BAGS, TOTE BAGS, CARD CASES, PASSPORT CASES, COSMETIC CASES, ATTACHE CASES, VALISES, SUITCASES, DUFFLES, NECKTIE CASES, UMBRELLAS, SADDLES, BRIDLES, WALKING STICKS, CANES, AND KEY CASES, in CLASS 18 (U.S. CLS. 3 and 41).

First use July 1963; in commerce July 1963.

The mark is made up of a stripe containing three distinct bands of colors, the colors being green, red then green.

Ser. No. 150,482, filed Dec. 1, 1977.

G. E. PENCE, Examiner