

ESTTA Tracking number: **ESTTA919017**

Filing date: **08/29/2018**

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

**Notice of Opposition**

Notice is hereby given that the following party opposes registration of the indicated application.

**Opposer Information**

Name	Kansas City Royals Baseball Corporation
Granted to Date of previous extension	08/29/2018
Address	Harry S. Truman Sports Complex 1 Royal Way Kansas City, MO 64129 UNITED STATES
Attorney information	Mary L. Kevlin / Joelle A. Milov Cowan, Liebowitz & Latman, P.C. 114 West 47th Street New York, NY 10036 UNITED STATES jam@cll.com, mlk@cll.com, rsm@cll.com, trademark@cll.com, tay@cll.com, rje@cll.com (212) 790-9200

**Applicant Information**

Application No	87704565	Publication date	05/01/2018
Opposition Filing Date	08/29/2018	Opposition Period Ends	08/29/2018
Applicant	National Women's Soccer League, LLC 1556 S. Michigan Avenue, Floor 2 Chicago, IL 60605 UNITED STATES		

**Goods/Services Affected by Opposition**

Class 009. First Use: 0 First Use In Commerce: 0 All goods and services in the class are opposed, namely: Pre-recorded video tapes relating to soccer and skills relating to soccer; pre-recorded DVDs relating to soccer and skills relating to soccer; pre-recorded CDs relating to soccer and skills relating to soccer; downloadable electronic publications relating to soccer and skills relating to soccer
Class 016. First Use: 0 First Use In Commerce: 0 All goods and services in the class are opposed, namely: Printed periodicals in the field of soccer; printed instructional and teaching materials for use in teaching the rules and skills relating to soccer; posters
Class 018. First Use: 0 First Use In Commerce: 0 All goods and services in the class are opposed, namely: Backpacks; wheeled bags; tote bags; sports bags

Class 025. First Use: 0 First Use In Commerce: 0  
 All goods and services in the class are opposed, namely: T-shirts; jackets; sweatshirts; jerseys; hats; caps being headwear; footwear; socks; headbands; wristbands as clothing

Class 028. First Use: 0 First Use In Commerce: 0  
 All goods and services in the class are opposed, namely: Toys, namely, soccer balls

### Applicant Information

Application No	87704569	Publication date	05/01/2018
Opposition Filing Date	08/29/2018	Opposition Period Ends	
Applicant	National Women's Soccer League, LLC 1556 S. Michigan Avenue, Floor 2 Chicago, IL 60605 UNITED STATES		

### Goods/Services Affected by Opposition

Class 038. First Use: 0 First Use In Commerce: 0  
 All goods and services in the class are opposed, namely: Entertainment services, namely, streaming soccer games online over the internet; Internet broadcasting of soccer competitions

Class 041. First Use: 0 First Use In Commerce: 0  
 All goods and services in the class are opposed, namely: Entertainment services, namely, participation in soccer sporting events and sporting exhibitions featuring soccer and skills relating to soccer; entertainment services, namely, entertainment in the nature of soccer games; entertainment in the nature of soccer tournaments and competitions; personal appearances of or by a sports personality; production of radio and television programs; production of television shows; arranging and conducting of colloquiums, conferences, congresses, seminars, symposiums and training workshops in the field of soccer; arranging and conducting of course of instruction relating to, or connected with, soccer; arranging and conducting of lectures and seminars for educational, entertainment, coaching and training purposes in the field of soccer and skills relating to soccer; arranging and conducting educational demonstrations; arranging and conducting sporting and training events in the field of soccer and skills relating to soccer; practical training relating to, or connected with, soccer and skills relating to soccer; entertainment services, namely, streaming soccer games online over the internet; providing educational information via the internet in the fields of soccer, coaching soccer, and refereeing soccer; soccer academies; entertainment services in the nature of professional athletes competing in soccer

### Applicant Information

Application No	87704696	Publication date	05/01/2018
Opposition Filing Date	08/29/2018	Opposition Period Ends	
Applicant	National Women's Soccer League, LLC 1556 S. Michigan Avenue, Floor 2 Chicago, IL 60605 UNITED STATES		

### Goods/Services Affected by Opposition

Class 009. First Use: 0 First Use In Commerce: 0  
 All goods and services in the class are opposed, namely: Pre-recorded video tapes relating to soccer and skills relating to soccer; pre-recorded DVDs relating to soccer and skills relating to soccer; pre-recorded CDs relating to soccer and skills relating to soccer; downloadable electronic publications relating to soccer and skills relating to soccer

Class 016. First Use: 0 First Use In Commerce: 0  
 All goods and services in the class are opposed, namely: Printed periodicals in the field of soccer;

printed instructional and teaching materials for use in teaching the rules and skills relating to soccer; posters
Class 018. First Use: 0 First Use In Commerce: 0 All goods and services in the class are opposed, namely: Backpacks; wheeled bags; tote bags; sports bags
Class 025. First Use: 0 First Use In Commerce: 0 All goods and services in the class are opposed, namely: T-shirts; jackets; sweatshirts; jerseys; hats; caps being headwear; footwear; socks; headbands; wristbands as clothing
Class 028. First Use: 0 First Use In Commerce: 0 All goods and services in the class are opposed, namely: Toys, namely, soccer balls

## Applicant Information

Application No	87704706	Publication date	05/01/2018
Opposition Filing Date	08/29/2018	Opposition Period Ends	
Applicant	National Women's Soccer League, LLC 1556 S. Michigan Avenue, Floor 2 Chicago, IL 60605 UNITED STATES		

## Goods/Services Affected by Opposition


Class 038. First Use: 0 First Use In Commerce: 0 All goods and services in the class are opposed, namely: Entertainment services, namely, streaming soccer games online over the internet; Internet broadcasting of soccer competitions
Class 041. First Use: 0 First Use In Commerce: 0 All goods and services in the class are opposed, namely: Entertainment services, namely, participation in soccer sporting events and sporting exhibitions featuring soccer and skills relating to soccer; entertainment services, namely, entertainment in the nature of soccer games; entertainment in the nature of soccer tournaments and competitions; personal appearances of or by a sports personality; production of radio and television programs; production of television shows; arranging and conducting of colloquiums, conferences, congresses, seminars, symposiums and training workshops in the field of soccer; arranging and conducting of course of instruction relating to, or connected with, soccer; arranging and conducting of lectures and seminars for educational, entertainment, coaching and training purposes in the field of soccer and skills relating to soccer; arranging and conducting educational demonstrations; arranging and conducting sporting and training events in the field of soccer and skills relating to soccer; practical training relating to, or connected with, soccer and skills relating to soccer; entertainment services, namely, streaming soccer games online over the internet; providing educational information via the internet in the fields of soccer, coaching soccer, and refereeing soccer; soccer academies; entertainment services in the nature of professional athletes competing in soccer

## Grounds for Opposition

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


## Marks Cited by Opposer as Basis for Opposition

U.S. Registration No.	893939	Application Date	05/15/1969
Registration Date	06/30/1970	Foreign Priority Date	NONE
Word Mark	KCR		


Design Mark	
Description of Mark	NONE
Goods/Services	Class 041. First use: First Use: 1969/03/26 First Use In Commerce: 1969/03/26 ENTERTAINMENT SERVICES IN THE NATURE OF BASEBALL EXHIBITIONS RENDERED LIVE AND THROUGH THE MEDIA OF RADIO AND TELEVISION

U.S. Registration No.	940214	Application Date	03/14/1969
Registration Date	08/01/1972	Foreign Priority Date	NONE
Word Mark	ROYAL LANCERS		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 200. First use: First Use: 1968/08/01 First Use In Commerce: 1968/08/01 INDICATING MEMBERSHIP IN APPLICANT		

U.S. Registration No.	1034779	Application Date	01/10/1974
Registration Date	03/02/1976	Foreign Priority Date	NONE
Word Mark	KC R ROYALS		


Design Mark	
Description of Mark	NONE
Goods/Services	<p>Class 014. First use: First Use: 1972/07/00 First Use In Commerce: 1972/07/00 WATCHES AND CLOCKS, [ TIE FASTENERS, TIE CLASPS, ] MONEY CLIPS, PENDANTS, CHARMBRACELETS, LAPEL PINS, [EARRINGS,] [ RINGS, ] COSTUME JEWELRY PINS</p> <p>Class 016. First use: First Use: 1972/04/00 First Use In Commerce: 1972/04/00 BASEBALL TRADING CARDS AND DECALS</p> <p>Class 018. First use: First Use: 1972/02/00 First Use In Commerce: 1972/02/00 [ TOTE BAGS ]</p> <p>Class 020. First use: First Use: 1972/00/00 First Use In Commerce: 1972/00/00 CUSHIONS AND WASTE BASKETS FOR DOMESTICUSE</p> <p>Class 021. First use: First Use: 1972/02/00 First Use In Commerce: 1972/02/00 DRINKING CUPS MADE OF PLASTIC [ AND PAPER CUPS ]</p> <p>Class 024. First use: First Use: 1972/00/00 First Use In Commerce: 1972/00/00 TOWELS</p> <p>Class 025. First use: First Use: 1972/00/00 First Use In Commerce: 1972/00/00 T-SHIRTS, SWEATSHIRTS, [PAJAMAS,] SOCKS, [PONCHOS,] JACKETS, PANTS AND ROBES</p> <p>Class 026. First use: First Use: 1972/02/00 First Use In Commerce: 1972/02/00 [CLOTH, IRON-ON, SEW-ON AND PRESSURE SENSITIVE PATCHES, AND BELT BUCKLES]</p> <p>Class 030. First use: First Use: 1971/03/00 First Use In Commerce: 1971/03/00 GUM</p> <p>Class 034. First use: First Use: 1971/00/00 First Use In Commerce: 1971/00/00 CIGARETTE LIGHTERS</p>

U.S. Registration No.	1505238	Application Date	08/05/1987
Registration Date	09/20/1988	Foreign Priority Date	NONE
Word Mark	KANSAS CITY ROYALS		
Design Mark			
Description of Mark	NONE		


Goods/Services	Class 041. First use: First Use: 1969/00/00 First Use In Commerce: 1969/00/00 ENTERTAINMENT SERVICES IN THE NATURE OF BASEBALL EXHIBITIONS		
U.S. Registration No.	1522388	Application Date	07/12/1988
Registration Date	01/31/1989	Foreign Priority Date	NONE
Word Mark	KC R ROYALS		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 006. First use: First Use: 1986/00/00 First Use In Commerce: 1986/00/00 NOVELTY ITEMS, NAMELY, KEY CHAINS [ AND MONEY CLIPS MADE OF METAL ]</p> <p>Class 009. First use: First Use: 1986/00/00 First Use In Commerce: 1986/00/00 [ THERMOMETERS ]</p> <p>Class 014. First use: First Use: 1987/00/00 First Use In Commerce: 1987/00/00 CLOCKS, WATCHES AND JEWELRY, NAMELY, LAPEL PINS</p> <p>Class 016. First use: First Use: 1986/00/00 First Use In Commerce: 1986/00/00 PAPER GOODS AND PRINTED MATTER, NAMELY, STICKERS, LITHOGRAPHS, BASEBALL CARDS</p> <p>Class 020. First use: First Use: 1986/00/00 First Use In Commerce: 1986/00/00 [ ORNAMENTAL NOVELTY ITEMS, NAMELY, MUSICAL CELLULOID BUTTONS AND BASEBALL STANDS ]</p> <p>Class 021. First use: First Use: 1973/00/00 First Use In Commerce: 1973/00/00 BEVERAGE CONTAINERS, NAMELY, CUPS AND MUGS</p> <p>Class 024. First use: First Use: 1986/00/00 First Use In Commerce: 1986/00/00 FABRICS, NAMELY, CLOTH PENNANTS, POTHOLDERS, [ TABLECLOTHS, ] BEDSPREADS AND SHEETS</p> <p>Class 025. First use: First Use: 1973/04/00 First Use In Commerce: 1973/04/00 CLOTHING, NAMELY, [ VISORS AND ] T-SHIRTS</p>		

	<p>Class 026. First use: First Use: 1978/00/00 First Use In Commerce: 1978/00/00 EMBROIDERED PATCHES FOR CLOTHING</p> <p>Class 028. First use: First Use: 1987/00/00 First Use In Commerce: 1987/00/00 TOYS AND SPORTING GOODS, NAMELY, METALLIZED BALLOONS, CHRISTMAS TREE ORNAMENTS, GOLF BALLS, DECORATIVE WINDSOCKS</p>
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U.S. Registration No.	1522533	Application Date	07/12/1988
Registration Date	01/31/1989	Foreign Priority Date	NONE
Word Mark	KANSAS CITY ROYALS		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 011. First use: First Use: 1987/00/00 First Use In Commerce: 1987/00/00 [ FLASHLIGHTS ]</p> <p>Class 021. First use: First Use: 1982/00/00 First Use In Commerce: 1982/00/00 BEVERAGE CONTAINERS, NAMELY, CUPS AND MUGS</p>		

U.S. Registration No.	1538005	Application Date	04/13/1988
Registration Date	05/09/1989	Foreign Priority Date	NONE
Word Mark	ROYALS		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 009. First use: First Use: 1988/01/01 First Use In Commerce: 1988/01/01 [ THERMOMETERS AND TELEPHONES ]</p> <p>Class 014. First use: First Use: 1988/01/01 First Use In Commerce: 1988/01/01 CLOCKS, COSTUME JEWELRY, namely, PINS, PENDANTS, [ TIE FASTENERS ] AND RINGS</p> <p>Class 016. First use: First Use: 1969/04/00 First Use In Commerce: 1969/04/00 TRADING CARDS, STICKERS, POSTERS, DECALS, LABELS, SCORE CARDS, PROGRAMS, SCOREBOOKS, YEARBOOKS AND POSTCARDS</p> <p>Class 024. First use: First Use: 1969/00/00 First Use In Commerce: 1969/00/00 [ CLOTH PENNANTS ]</p>		

	<p>Class 025. First use: First Use: 1984/01/16 First Use In Commerce: 1984/01/16 CLOTHING - NAMELY, T-SHIRTS, SWEATSHIRTS, JACKETS, [ SWEATERS, ] SUN VISORS, HATS AND CAPS</p> <p>Class 028. First use: First Use: 1985/05/00 First Use In Commerce: 1985/05/00 CHRISTMAS TREE ORNAMENTS, STUFFED ANIMAL TOYS, DOLLS AND BASEBALLS</p>
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U.S. Registration No.	1552486	Application Date	07/14/1988
Registration Date	08/22/1989	Foreign Priority Date	NONE
Word Mark	ROYALS		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 006. First use: First Use: 1986/00/00 First Use In Commerce: 1986/00/00 NOVELTY ITEMS MADE OF METAL, NAMELY MONEY CLIPS AND KEY RINGS</p> <p>Class 020. First use: First Use: 1986/00/00 First Use In Commerce: 1986/00/00 ORNAMENTAL NOVELTY ITEMS MADE OF PLASTIC, namely, KEY CHAIN TAGS, [ PLASTIC MAGNETIC PINS ] AND MUSICAL CELLULOID BUTTONS</p> <p>Class 021. First use: First Use: 1982/00/00 First Use In Commerce: 1982/00/00 CERAMIC BOBBING FIGURES AND BEVERAGE CONTAINERS, NAMELY CUPS AND MUGS</p>		

U.S. Registration No.	1607457	Application Date	11/13/1989
Registration Date	07/24/1990	Foreign Priority Date	NONE
Word Mark	ROYALS		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 016. First use: First Use: 1969/00/00 First Use In Commerce: 1969/00/00 PAPER GOODS AND PRINTED MATTER, NAMELY, BUMPER STICKERS, LAMINATED SIGNS, DECALS, [ WINDSHIELD SUNSCREENS, ] PAPER WEIGHTS, PENS, PENCILS, PADS, LETTER OPENERS, [ PAPER CLIPS, ] POSTERS, NOTE PAPER, BASEBALL CARDS, CALENDARS, [ MARKERS, ] [ ERASERS ], [ PENCIL SHARPENERS, ] [ RULERS, ] [ BOOK COVERS ], [ COLORING BOOKS, ] PLAYING CARDS [ , FOLDERS ] AND POSTCARDS</p> <p>Class 025. First use: First Use: 1969/00/00 First Use In Commerce: 1969/00/00</p>		



	CLOTHING, NAMELY, SHIRTS, SHORTS, [ DRESSES, SKIRTS ][ JOGGING SUITS,] SOCKS, [UNDERWEAR, ] JACKETS, [SWEATERS,] [ VESTS ], PANTS, [PONCHOS, VISORS, RAINCOATS ], CAPS, BIBS, TIES, [MEN'S] [ AND WOMEN'S ] [ FORMALWEAR ], SWEATSHIRTS, [ MITTENS, GLOVES, KNITTED HEADWEAR ], [ SCARVES, ] HOSIERY, [ WRISTBANDS ], HEADBANDS, ROBES, [ APRONS AND ] [PAJAMAS ], COMBINATION SHORTS AND SHIRTS
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U.S. Registration No.	1774283	Application Date	08/21/1992
Registration Date	06/01/1993	Foreign Priority Date	NONE

Word Mark	KC R ROYALS
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Design Mark	
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Description of Mark	NONE
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Goods/Services	Class 025. First use: First Use: 1973/04/00 First Use In Commerce: 1973/04/00 clothing; namely, shirts, [shorts, jogging suits, socks, underwear,] jackets[, sweaters, pants, ponchos, visors, raincoats, hats, caps, cloth bibs, infant diaper sets consisting of an undershirt and a bottom, pajamas, sweatshirts, gloves, knitted headwear, scarves, wristbands, headbands, robes, aprons, and shoes]
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U.S. Registration No.	2623374	Application Date	10/23/2000
Registration Date	09/24/2002	Foreign Priority Date	NONE

Word Mark	KC R ROYALS
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Design Mark			
Description of Mark	NONE		
Goods/Services	Class 041. First use: First Use: 1969/04/08 First Use In Commerce: 1969/04/08 Entertainment and information services, namely, baseball games, competitions and exhibitions rendered live through broadcast media including television [ and radio ] and via a global computer network or a commercial on-line service; providing information in the field of sports, entertainment and related topics and providing for informational messages relating thereto; [ providing multi-user interactive computer games all via a global computer network or a commercial on-line service; education services in the nature of baseball skills instruction ]		
U.S. Registration No.	2665338	Application Date	10/23/2000
Registration Date	12/24/2002	Foreign Priority Date	NONE
Word Mark	KC R		


Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 041. First use: First Use: 1969/04/08 First Use In Commerce: 1969/04/08  Entertainment and information services, namely, baseball games, competitions and exhibitions rendered live through broadcast media including television [ and radio ] and via a global computer network or a commercial on-line service; providing information in the field of sports, entertainment and related topics and providing for informational messages relating thereto; [ providing multi-user interactive computer games all via a global computer network or a commercial on-line service; education services in the nature of baseball skills instruction ]</p>		
U.S. Registration No.	3363256	Application Date	06/02/2005
Registration Date	01/01/2008	Foreign Priority Date	NONE
Word Mark	ROYALS		

Design Mark	
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Description of Mark	NONE
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Goods/Services	<p>Class 028. First use: First Use: 1985/05/00 First Use In Commerce: 1985/05/00  Toys and sporting goods, namely, stuffed toys, plush toys, soft sculpture foam toys; foam novelty items, namely, foam fingers; balloons, board games, card games, playing cards, dart boards and dart board accessories, namely, darts, dart shafts and dart flights, toy vehicles, [ toy mobiles, ] jigsaw and manipulative puzzles, toy banks, toy figures, toy vehicles, dolls and doll accessories, bobbing-head dolls; [decorative wind socks,] miniature baseball bats, toy necklaces, [ miniature toy baseballs, ] baseballs, holders for baseballs, autographed baseballs, [ playground balls, rubber action balls, ] golf balls, golf club head covers, [ golf putters; ] billiard accessories, namely, cues, billiard balls [ and cuecases; ] baseball bases, baseball bats,[ baseball gloves; ] costume masks; Christmas tree ornaments, excluding confectionery and illumination articles, and Christmas stockings</p>
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U.S. Registration No.	3370316	Application Date	06/02/2005
Registration Date	01/15/2008	Foreign Priority Date	NONE
Word Mark	ROYALS		

Design Mark	
Description of Mark	The mark consists of the word "ROYALS" in stylized form.
Goods/Services	Class 014. First use: First Use: 1986/00/00 First Use In Commerce: 1986/00/00 Jewelry, namely, bracelets, charms, earrings, rings, [belly rings, ] necklaces, pendants, watches, costume jewelry, rubber or silicone bracelets and wristbands in the nature of bracelets, medallions, ornamental metal pins, lapel pins, cufflinks, [ tie tacks, tie pins,] clocks, wall clocks, alarm clocks, [ fob watches, clock key chains,] and non-monetary coins of precious metal; key-chains and keyrings of precious metal

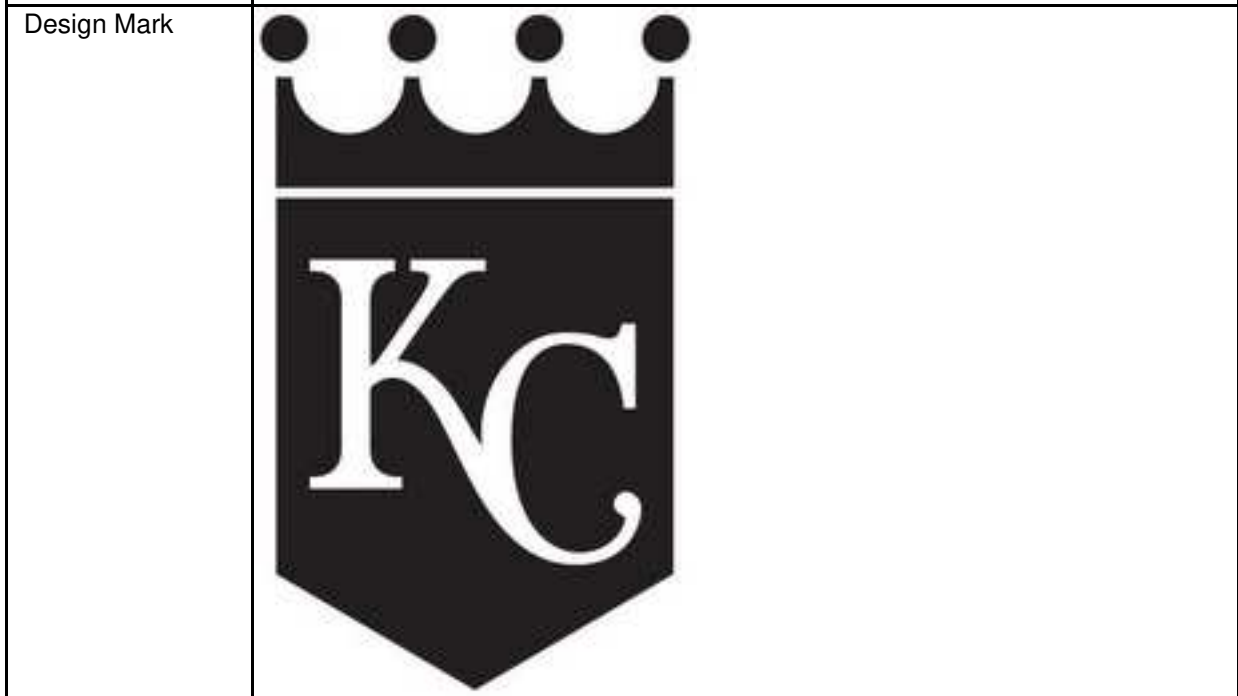
U.S. Registration No.	4872848	Application Date	10/08/2014
Registration Date	12/22/2015	Foreign Priority Date	NONE

Word Mark	KC
Design Mark	

Description of Mark	The mark consists of a polygon-shaped banner that depicts the stylized letters "KC" at midpoint and a four-pointed crown that appears to hover slightly above the banner's top line.
Goods/Services	Class 025. First use: First Use: 2002/01/01 First Use In Commerce: 2002/01/01 Clothing, namely, headwear, shirts, T-shirts, tank tops, sweatshirts, sweaters, bottoms, dresses, athletic uniforms, jerseys, underwear, sleepwear, robes, jackets, aprons, infant wear, cloth bibs, ties, belts, garters, footwear, socks, gloves, mittens, headbands, wristbands

U.S. Registration No.	4876784	Application Date	10/08/2014
Registration Date	12/29/2015	Foreign Priority Date	NONE

Word Mark	KC
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Description of Mark	The mark consists of a polygon-shaped banner that depicts the stylized letters "KC" at midpoint and a four-pointed crown that appears to hover slightly above the banner's top line.
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Goods/Services	Class 009. First use: First Use: 2002/04/02 First Use In Commerce: 2002/04/02 Electrical and scientific apparatus, namely, headphones, pre-recorded CDs, laser disks and DVDs relating to baseball, magnetically encoded credit cards, compact disc cases, carrying cases for hand-held computers, protective carrying cases for portable music players, namely, MP3 players, telephones, cases specially adapted for personal digital assistants, cell phones, cell phone accessories, namely, cases and face plate covers, binoculars, calculators, tape measures, rain gauges, thermometers not for medical purposes, decorative switch plate covers, luminous signs, neon signs, fitted plastic films known as skins for covering and providing a scratch proof barrier or protection for electronic devices, namely, MP3players, mobile telephones, smart telephones and personal digital assistants, sunglasses, decorative magnets, protective helmets, protective work gloves, sports helmets, electronic controllers for use with video games, computer accessories, namely, computer mouse and mouse pads, megaphones, protective sleeves for laptop computers, USB charging ports, cushioned support base specially adapted to prop up laptop computers, computer software, namely, screen savers for personal computers and cell
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	phones, downloadable ring tones and graphics for mobile phones,downloadable computer software for use in accessing and displaying computer browsers, computer game programs, and computer application programs downloadable from a global computer network for viewingdatabases of information, statistical information, and multimedia content in the field of baseball
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U.S. Registration No.	4872849	Application Date	10/08/2014
Registration Date	12/22/2015	Foreign Priority Date	NONE

Word Mark	KC
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Design Mark	
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Description of Mark	The mark consists of a polygon-shaped banner that depicts the stylized letters "KC" at midpoint and a four-pointed crown that appears to hover slightly above the banner's top line.
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Goods/Services	Class 024. First use: First Use: 2002/05/03 First Use In Commerce: 2002/05/03 Fabrics, namely, towels, cloth pennantsand felt pennants, bed sheets, pillow cases, comforters, bedspreads, blankets, blanket throws, pot holders, oven mitts,kitchen towels, cloth banners, cloth flags, handkerchiefs, washcloths, and tapestries of textiles
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U.S. Registration No.	4872850	Application Date	10/08/2014
Registration Date	12/22/2015	Foreign Priority Date	NONE

Word Mark	KC
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Design Mark			
Description of Mark	<p>The mark consists of a polygon-shaped banner that depicts the stylized letters "KC" at midpoint and a four-pointed crown that appears to hover slightly above the banner's top line.</p>		
Goods/Services	<p>Class 016. First use: First Use: 2002/01/31 First Use In Commerce: 2002/01/31 Paper goods and printed matter, namely, trading cards, posters, stickers, decals, temporary tattoos, bumper stickers, score books, scorecards, printed baseballgame programs, magazines and books featuring baseball, newsletters, brochures and pamphlets featuring baseball, dry erase writing boards and writing surfaces, writing pads, notebooks, cards, and envelopes; flip books, preprinted agenda organizers, memo boards, scrapbooks, autograph books, baseball card albums, calendars, printed bank checkbooks, gift wrapping paper, paper gift and party bags, paper party goods in the nature of paper party decorations, paper coasters, paper napkins, facial tissue, paper tablecloths, mounted and unmounted photographs, photograph albums, plastic baseball card holders, money clips, paperweights, pens, pencils, pencil top ornaments, crayons, markers, non-electric erasers, pencil sharpeners, pencil cases, paper ticket holders and non-metal lanyards for paper ticket holders sold as a unit specially adapted for holding paper tickets and art prints</p>		
U.S. Registration No.	5009029	Application Date	04/21/2015
Registration Date	07/26/2016	Foreign Priority Date	NONE
Word Mark	LOS REALES		



Design Mark	<h1>LOS REALES</h1>		
Description of Mark	NONE		
Goods/Services	Class 025. First use: First Use: 2015/05/05 First Use In Commerce: 2015/05/05 Clothing, namely, headwear, shirts, athletic uniforms, jerseys, jackets		

U.S. Registration No.	5060403	Application Date	04/21/2015
Registration Date	10/11/2016	Foreign Priority Date	NONE
Word Mark	LOS REALES		
Design Mark	<h1>LOS REALES</h1>		
Description of Mark	NONE		
Goods/Services	Class 041. First use: First Use: 2015/05/05 First Use In Commerce: 2015/05/05 Entertainment services, namely, baseball games and exhibitions, and organizing and conducting an array of athletic events rendered live and recorded for distribution through broadcast media; educational services in the nature of baseball camps and clinics; entertainment services, namely, conducting contests; providing news, information all of the foregoing in the field of sports; organizing community sporting and cultural events; entertainment in the nature of live performances by costumed mascots and dance groups		

U.S. Registration No.	5144885	Application Date	03/31/2016
Registration Date	02/21/2017	Foreign Priority Date	NONE
Word Mark	FOREVER ROYAL		

Design Mark	<h1>FOREVER ROYAL</h1>
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Description of Mark	NONE
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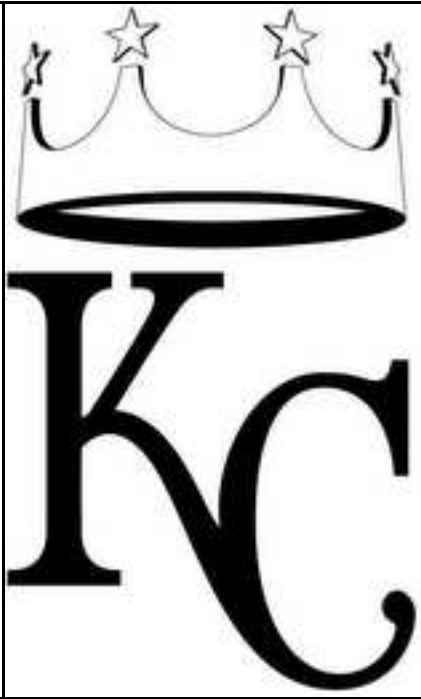
Goods/Services	<p>Class 041. First use: First Use: 2015/02/01 First Use In Commerce: 2015/02/01  Entertainment services, namely, baseball games and baseball exhibitions; Organizing and conducting an array of athletic events rendered live and recorded for distribution through broadcast media; Educational services in the nature of baseball camps, seminars and clinics; Entertainment services, namely, conducting contests and sweepstakes; Entertainment media production services, namely, production of on-going television, internet and radio programs in the field of sports; Providing news, information, pod casts, web casts and online newsletters, all in the field of sports; providing online journals, namely, blogs in the field of sports; Organizing community sporting and cultural events; Entertainment in the nature of live performances by costumed mascots, cheerleaders, dance groups, and musical groups; Entertainment, namely, live music concerts; Fan clubs; Providing sports facilities; Rental of stadium facilities; Providing facilities for sports tournaments; Online admission ticket agency services for entertainment, educational, sporting and cultural events; Museums; Conducting guided tours of a baseball stadium</p>
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U.S. Registration No.	5470597	Application Date	12/23/2016
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Registration Date	05/15/2018	Foreign Priority Date	NONE
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Word Mark	KC ROYALS
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Design Mark			
Description of Mark	The mark consists of the word "ROYALS" in stylized lettering underneath a polygon-shaped banner that has a four pointed crown on top that contains interlocked stylized letters "KC".		
Goods/Services	Class 025. First use: First Use: 2002/00/00 First Use In Commerce: 2002/00/00 Clothing, namely, headwear, shirts, vests, bottoms, skirts, sleepwear, robes, jackets, aprons, infant wear, cloth bibs, belts, footwear, socks, hosiery, gloves, headbands		
U.S. Registration No.	5419425	Application Date	12/23/2016
Registration Date	03/06/2018	Foreign Priority Date	NONE
Word Mark	KC		

Design Mark	
Description of Mark	The mark consists of stylized letters "KC" that are interlocked beneath a crown design that has four points with stars above each of the points.
Goods/Services	Class 025. First use: First Use: 2016/01/05 First Use In Commerce: 2016/01/05 Clothing, namely, headwear, shirts, athletic uniforms, jerseys, jackets, infant-wear, socks, hosiery

U.S. Registration No.	5492172	Application Date	11/13/2017
Registration Date	06/12/2018	Foreign Priority Date	NONE
Word Mark	RAISED ROYAL		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 041. First use: First Use: 2017/02/05 First Use In Commerce: 2017/02/05 Entertainment services, namely, baseball games, baseball exhibitions; Organizing and conducting an array of athletic events rendered live and recorded for distribution through broadcast media; Educational services in the nature of baseball and softball camps, conducting seminars in the field of sports and cultural history in the nature of human interest stories and providing instructions in the nature of sports clinics; Entertainment services, namely, conducting contests, sweepstakes, and on-line sports competitions; Entertainment services in the nature of fantasy sports leagues; Entertainment services, namely, providing		

	news, information, webcasts, online newsletters, and online journals in the nature of blogs, all of the foregoing in the field of sports and cultural events; Organizing community sporting and cultural events; Entertainment in the nature of live performances by celebrities, costumed mascots, cheerleaders, and dance groups; Fan clubs; Rental of stadium facilities; Providing facilities for sports tournaments; On-line admission ticket agency services for entertainment, educational, sporting and cultural events; Museums; Entertainment, namely, live music concerts; Organizing, arranging and conducting running, walking, and golfing events, the proceeds of which are donated to charity; Mural art painting services
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U.S. Application No.	87677057	Application Date	11/08/2017
Registration Date	NONE	Foreign Priority Date	NONE
Word Mark	RAISED		
Design Mark			
Description of Mark	The mark consists of stylized letters "RAISED" that are adjacent to a crown design that has four points with stars above each of the points.		
Goods/Services	<p>Class 041. First use: First Use: 0 First Use In Commerce: 0</p> <p>Entertainment services, namely, baseball games, baseball exhibitions; Organizing and conducting an array of athletic events rendered live and recorded for distribution through broadcast media; Educational services in the nature of baseball and softball camps, conducting seminars in the field of sports and cultural history in the nature of human interest stories and providing instructions in the nature of sports clinics; Entertainment services, namely, conducting contests, sweepstakes, and online sports competitions; Entertainment services in the nature of fantasy sports leagues; Production and provision of on-going television, internet and radio programs in the field of sports and cultural events; Entertainment services, namely, providing news, information, podcasts, webcasts, online newsletters, and online journals in the nature of blogs, all of the foregoing in the field of sports and cultural events; Organizing community sporting and cultural events; Entertainment in the nature of live performances by celebrities, costumed mascots, cheerleaders, and dance groups; Fan clubs; Rental of stadium facilities; Providing facilities for sports tournaments; On-line admission ticket agency services for entertainment, educational, sporting and cultural events; Museums; Entertainment, namely, live music concerts; Organizing, arranging and conducting running, walking, cycling, and golfing events, the proceeds of which are donated to charity</p>		

U.S. Application No.	87677066	Application Date	11/08/2017
Registration Date	NONE	Foreign Priority Date	NONE
Word Mark	RAISED		
Design Mark			
Description of Mark	The mark consists of stylized letters "RAISED" adjacent to a crown design that has four points with stars above each of the points.		
Goods/Services	Class 025. First use: First Use: 0 First Use In Commerce: 0		

	Clothing, namely, headwear, shirts, sweaters, vests, bottoms, dresses, skirts, athletic uniforms, jerseys, underwear, undergarments, sleepwear, robes, swimwear, jackets, ponchos, aprons, clothing wraps, infant wear, cloth bibs, ties, belts, footwear, socks, hosiery, scarves, gloves, mittens, headbands, wristbands, Halloween and masquerade costumes
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U.S. Application No.	87681810	Application Date	11/13/2017
Registration Date	NONE	Foreign Priority Date	NONE

Word Mark	RAISED ROYAL
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Design Mark	
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Description of Mark	NONE
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Goods/Services	Class 025. First use: First Use: 0 First Use In Commerce: 0 Clothing, namely, headwear, shirts, sweaters, vests, bottoms, dresses, skirts, athletic uniforms, jerseys, underwear, undergarments, sleepwear, robes, swimwear, jackets, ponchos, aprons, clothing wraps, infant wear, cloth bibs, ties, belts, footwear, socks, hosiery, scarves, gloves, mittens, headbands, wristbands, Halloween and masquerade costumes
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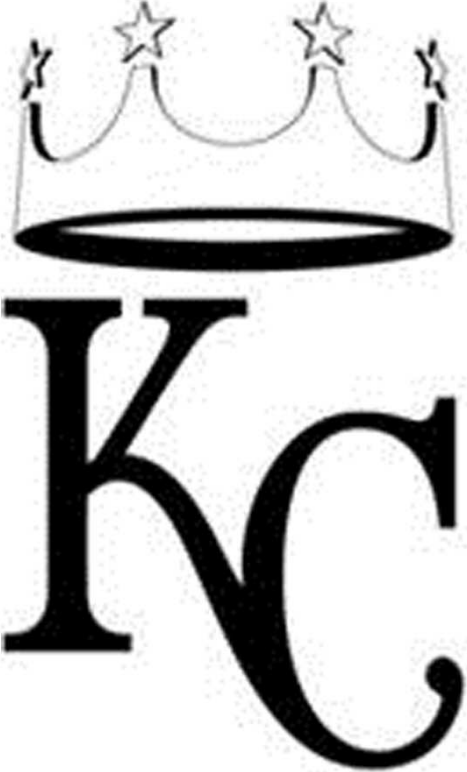
U.S. Application/ Registration No.	NONE	Application Date	NONE
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Registration Date	NONE
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Word Mark	the marks ROYAL, ROYALS, or LOS REALES, alone or with other word, letter and/or design elements, including a lion mascot and crown designs
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Goods/Services	baseball games and exhibition services and a wide variety of goods and services, including, but not limited to, CDs and DVDs; paper goods and printed matter, including without limitation, posters, programs, scorecards, decals, stickers, calendars, bumper stickers and postcards; backpacks, wheeled bags, tote bags, duffle bags and sports bags; apparel, including, without limitation, shirts, t-shirts, sweatshirts, sweaters, socks, jackets, bottoms, pants, shorts, headwear, sun visors, hats, caps, athletic uniforms, jerseys, underwear, sleepwear, footwear, hosiery, scarves, headbands and wristbands; toys and sporting goods and equipment; audio and video streaming of games; entertainment services, including, live music concerts; organizing community sporting and cultural events; educational services, including, but not limited to, baseball camps, seminars, and clinics, providing instruction in the nature of sports clinics; production of TV and radio programs; providing news, information, pod casts, web casts and online newsletters, all in the field of sports; providing online journals, namely, blogs in the field of sports; online ticket agency services for entertainment, educational, sporting and cultural events; and
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	novelty items		
U.S. Application/ Registration No.	NONE	Application Date	NONE
Registration Date	NONE		
Design Mark			
Goods/Services	<p>baseball games and exhibition services and a wide variety of goods and services, including, but not limited to, CDs and DVDs; paper goods and printed matter, including without limitation, posters, programs, scorecards, decals, stickers, calendars, bumper stickers and postcards; backpacks, wheeled bags, tote bags, duffle bags and sports bags; apparel, including, without limitation, shirts, t-shirts, sweatshirts, sweaters, socks, jackets, bottoms, pants, shorts, headwear, sun visors, hats, caps, athletic uniforms, jerseys, underwear, sleepwear, footwear, hosiery, scarves, headbands and wristbands; toys and sporting goods and equipment; audio and video streaming of games; entertainment services, including, live music concerts; organizing community sporting and cultural events; educational services, including, but not limited to, baseball camps, seminars, and clinics, providing instruction in the nature of sports clinics; production of TV and radio programs; providing news, information, pod casts, web casts and online newsletters, all in the field of sports; providing online journals, namely, blogs in the field of sports; online ticket agency services for entertainment, educational, sporting and cultural events; and novelty items</p>		
U.S. Application/ Registration No.	NONE	Application Date	NONE
Registration Date	NONE		

Design Mark	
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Goods/Services	<p>baseball games and exhibition services and a wide variety of goods and services, including, but not limited to, CDs and DVDs; paper goods and printed matter, including without limitation, posters, programs, scorecards, decals, stickers, calendars, bumper stickers and postcards; backpacks, wheeled bags, tote bags, duffle bags and sports bags; apparel, including, without limitation, shirts, t-shirts, sweatshirts, sweaters, socks, jackets, bottoms, pants, shorts, headwear, sun visors, hats, caps, athletic uniforms, jerseys, underwear, sleepwear, footwear, hosiery, scarves, headbands and wristbands; toys and sporting goods and equipment; audio and video streaming of games; entertainment services, including, live music concerts; organizing community sporting and cultural events; educational services, including, but not limited to, baseball camps, seminars, and clinics, providing instruction in the nature of sports clinics; production of TV and radio programs; providing news, information, pod casts, web casts and online newsletters, all in the field of sports; providing online journals, namely, blogs in the field of sports; online ticket agency services for entertainment, educational, sporting and cultural events; and novelty items</p>
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U.S. Application/ Registration No.	NONE	Application Date	NONE
Registration Date	NONE		



Design Mark	
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Goods/Services	<p>baseball games and exhibition services and a wide variety of goods and services, including, but not limited to, CDs and DVDs; paper goods and printed matter, including without limitation, posters, programs, scorecards, decals, stickers, calendars, bumper stickers and postcards; backpacks, wheeled bags, tote bags, duffle bags and sports bags; apparel, including, without limitation, shirts, t-shirts, sweatshirts, sweaters, socks, jackets, bottoms, pants, shorts, headwear, sun visors, hats, caps, athletic uniforms, jerseys, underwear, sleepwear, footwear, hosiery, scarves, headbands and wristbands; toys and sporting goods and equipment; audio and video streaming of games; entertainment services, including, live music concerts; organizing community sporting and cultural events; educational services, including, but not limited to, baseball camps, seminars, and clinics, providing instruction in the nature of sports clinics; production of TV and radio programs; providing news, information, pod casts, web casts and online newsletters, all in the field of sports; providing online journals, namely, blogs in the field of sports; online ticket agency services for entertainment, educational, sporting and cultural events; and novelty items</p>
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U.S. Application/ Registration No.	NONE	Application Date	NONE
Registration Date	NONE		

Design Mark	
Goods/Services	<p>baseball games and exhibition services and a wide variety of goods and services, including, but not limited to, CDs and DVDs; paper goods and printed matter, including without limitation, posters, programs, scorecards, decals, stickers, calendars, bumper stickers and postcards; backpacks, wheeled bags, tote bags, duffle bags and sports bags; apparel, including, without limitation, shirts, t-shirts, sweatshirts, sweaters, socks, jackets, bottoms, pants, shorts, headwear, sun visors, hats, caps, athletic uniforms, jerseys, underwear, sleepwear, footwear, hosiery, scarves, headbands and wristbands; toys and sporting goods and equipment; audio and video streaming of games; entertainment services, including, live music concerts; organizing community sporting and cultural events; educational services, including, but not limited to, baseball camps, seminars, and clinics, providing instruction in the nature of sports clinics; production of TV and radio programs; providing news, information, pod casts, web casts and online newsletters, all in the field of sports; providing online journals, namely, blogs in the field of sports; online ticket agency services for entertainment, educational, sporting and cultural events; and novelty items</p>

Attachments	<p>72327388#TMSN.png( bytes )  73010579#TMSN.png( bytes )  73739438#TMSN.png( bytes )  73739413#TMSN.png( bytes )  73722117#TMSN.png( bytes )  73739837#TMSN.png( bytes )  74306134#TMSN.png( bytes )  76152921#TMSN.png( bytes )  76152922#TMSN.png( bytes )  78642375#TMSN.png( bytes )</p>
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	78642377#TMSN.png( bytes ) 86417843#TMSN.png( bytes ) 86417845#TMSN.png( bytes ) 86417850#TMSN.png( bytes ) 86418174#TMSN.png( bytes ) 86603974#TMSN.png( bytes ) 86603968#TMSN.png( bytes ) 86959164#TMSN.png( bytes ) 87279760#TMSN.png( bytes ) 87279774#TMSN.png( bytes ) 87681806#TMSN.png( bytes ) 87677057#TMSN.png( bytes ) 87677066#TMSN.png( bytes ) 87681810#TMSN.png( bytes ) Resize 01.jpg Resize 02.jpg Resize 03.jpg Resize 04.jpg UTAH ROYALS - NOO.pdf(39105 bytes ) UTAH ROYALS - Letter to Commissioner.pdf(49089 bytes )
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Signature	/Robert J. English/
Name	/Robert J. English/
Date	08/29/2018

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

In re Application Serial Nos. 87704565, 87704569, 87704696 and 87704706  
Filed: December 1, 2017  
For Mark: UTAH ROYALS FC and UTAH ROYALS FC and Design  
Published in the Official Gazette: May 1, 2018

-----X	:	
KANSAS CITY ROYALS BASEBALL	:	
CORPORATION,	:	Opposition No.
	:	
Opposer,	:	
	:	<b>CONSOLIDATED</b>
v.	:	<b><u>NOTICE OF OPPOSITION</u></b>
	:	
NATIONAL WOMEN'S SOCCER LEAGUE,	:	
LLC,	:	
	:	
Applicant.	:	
-----X	:	

Commissioner for Trademarks  
Attn: Trademark Trial and Appeal Board  
P.O. Box 1451  
Alexandria, VA 22313-1451

Opposer, Kansas City Royals Baseball Corporation (“Opposer”), a Missouri corporation with offices at 1 Royal Way, Kansas City, Missouri 64129, believes that it will be damaged by registration of:

(i) the standard character word mark UTAH ROYALS FC (“Applicant’s Mark”) filed by National Women's Soccer League, LLC (“Applicant”) for:

- “Pre-recorded video tapes relating to soccer and skills relating to soccer; pre-recorded DVDs relating to soccer and skills relating to soccer; pre-recorded CDs relating to soccer and skills relating to soccer; downloadable electronic publications relating to soccer and skills relating to soccer” in International Class 9, “Printed periodicals in the field of soccer; printed instructional and teaching

materials for use in teaching the rules and skills relating to soccer; posters” in International Class 16, “Backpacks; wheeled bags; tote bags; sports bags” in International Class 18, “T-shirts; jackets; sweatshirts; jerseys; hats; caps being headwear; footwear; socks; headbands; wristbands as clothing” in International Class 25, and “Toys, namely, soccer balls” in International Class 28 (collectively, “Applicant’s Goods”, as shown in Application Serial No. 87704565 (the “‘565 Application”); and

- “Entertainment services, namely, streaming soccer games online over the internet; Internet broadcasting of soccer competitions” in International Class 38, and “Entertainment services, namely, participation in soccer sporting events and sporting exhibitions featuring soccer and skills relating to soccer; entertainment services, namely, entertainment in the nature of soccer games; entertainment in the nature of soccer tournaments and competitions; personal appearances of or by a sports personality; production of radio and television programs; production of television shows; arranging and conducting of colloquiums, conferences, congresses, seminars, symposiums and training workshops in the field of soccer; arranging and conducting of course of instruction relating to, or connected with, soccer; arranging and conducting of lectures and seminars for educational, entertainment, coaching and training purposes in the field of soccer and skills relating to soccer; arranging and conducting educational demonstrations; arranging and conducting sporting and training events in the field of soccer and skills relating to soccer; practical training relating to, or connected with, soccer and skills relating to soccer; entertainment services, namely, streaming soccer

games online over the internet; providing educational information via the internet in the fields of soccer, coaching soccer, and refereeing soccer; soccer academies; entertainment services in the nature of professional athletes competing in soccer” in International Class 41 (collectively, “Applicant’s Services”) as shown in Application Serial No. 87704569 (the “569 Application”), and



(ii) the UTAH ROYALS FC and Lion and Crown Design shown here (“Applicant’s Design Mark”) filed by Applicant for:

- Applicant’s Goods as shown in Application Serial No. 87704696 (the “696 Application”)
- Applicant’s Services as shown in Application Serial No. Number 87704706 (the “706 Application”),

(collectively, the ‘706 Application, the ‘696 Application, the ‘569 Application and the ‘565 Application, are referred to as the “Applications”), and having been granted extensions of time to oppose the Applications up to and including August 29, 2018, Opposer hereby opposes the same.

As grounds for opposition, it is alleged that:

1. Opposer is the owner of the renowned KANSAS CITY ROYALS MAJOR LEAGUE BASEBALL club that from its inception has been commonly known and referred to simply as the ROYALS.

2. Opposer’s ROYALS club has had a storied history, including participation in nine POSTSEASON playoff series and four WORLD SERIES championships, winning the title twice, including most recently in 2015.

3. Many of the greatest and most famous Major League Baseball players are known for their accomplishments as members of Opposer's ROYALS club, including six members of the National Baseball Hall of Fame, an organization that honors those individuals, including players and managers, who have made outstanding contributions to the game of baseball (George Brett, Orlando Cepeda, Harmon Killebrew, Gaylord Perry and managers Joe Gordon and Bob Lemon); three winners of the Cy Young Award, an honor given out once a year to the best pitcher in each of the two Major League Baseball leagues (David Cone, Bret Saberhagen and Zach Greinke); and one player who made American Sports history by becoming the first modern-day athlete to play at the professional level in two sports (Bo Jackson, who also played for the Oakland Raiders football team of the National Football League).

4. For decades and since long prior to December 1, 2017, Applicant's constructive first use date, Opposer and its predecessors, and their affiliated and related entities, its hundreds of licensees and/or numerous well-known sponsors have used and/or have constructive use of the names and marks ROYAL, ROYALS, or LOS REALES, alone or with other word, letter and/or design elements, including a lion mascot and crown designs, as well as the geographic designations KANSAS CITY, OMAHA and BURLINGTON ("Opposer's ROYALS Marks") and designs of a crown or a lion mascot with other marks of Opposer ("Opposer's Design Marks," with Opposer's ROYALS Marks, collectively referred to as "Opposer's Marks"), in connection with baseball games and exhibition services and a wide variety of goods and services, including, but not limited to, CDs and DVDs; paper goods and printed matter, including without limitation, posters, programs, scorecards, decals, stickers, calendars, bumper stickers and postcards; backpacks, wheeled bags, tote bags, duffle bags and sports bags; apparel, including, without limitation, shirts, t-shirts, sweatshirts, sweaters, socks, jackets, bottoms, pants, shorts, headwear, sun visors, hats, caps, athletic

uniforms, jerseys, underwear, sleepwear, footwear, hosiery, scarves, headbands and wristbands; toys and sporting goods and equipment; audio and video streaming of games; entertainment services, including, live music concerts; organizing community sporting and cultural events; educational services, including, but not limited to, baseball camps, seminars, and clinics, providing instruction in the nature of sports clinics; production of TV and radio programs; providing news, information, pod casts, web casts and online newsletters, all in the field of sports; providing online journals, namely, blogs in the field of sports; online ticket agency services for entertainment, educational, sporting and cultural events; and novelty items.

5. Opposer owns United States Federal applications and registrations for Opposer's Marks in International Classes 6, 9, 14, 16, 20, 21, 24, 25, 26, 28, 30, 34 and 41 and U.S. Class 200, namely, Application Nos. 87677057; 87677066; and 87681810, and Registration Nos. 893939; 940214; 1034779; 1505238; 1522388; 1522533; 1538005; 1552486; 1607457; 1774283; 2623374; 2665338; 3363256; 3370316; 4872848; 4876784; 4872849; 4872850; 5009029; 5060403; 5144885; 5470597; 5419425; and 5492172. Registration Nos. 893939; 940214; 1034779; 1505238; 1520765; 1522388; 1522533; 1538005; 1552486; 1607457; 1774283; 2623374; 2665338; 3363256; 3370316; 5009029; 5060403; 5144885 are incontestable.

6. For decades and since long prior to December 1, 2017, Applicant's constructive first use date, Opposer and its predecessors, and their affiliated and related entities, licensees and/or sponsors have extensively promoted and advertised the sale and distribution of goods and services bearing or offered in connection with Opposer's ROYALS Marks, including, but not limited to, baseball games and exhibition services and a wide variety of goods and services, including, but not limited to, CDs and DVDs; paper goods and printed matter, including without limitation, posters, programs, scorecards, decals, stickers, calendars, bumper stickers and



postcards; backpacks, wheeled bags, tote bags, duffle bags and sports bags; apparel, including, without limitation, shirts, t-shirts, sweatshirts, sweaters, socks, jackets, bottoms, pants, shorts, headwear, sun visors, hats, caps, athletic uniforms, jerseys, underwear, sleepwear, footwear, hosiery, scarves, headbands and wristbands; toys and sporting goods and equipment; audio and video streaming of games; entertainment services, including, live music concerts; organizing community sporting and cultural events; educational services, including, but not limited to, baseball camps, seminars, and clinics, providing instruction in the nature of sports clinics; production of TV and radio programs; providing news, information, pod casts, web casts and online newsletters, all in the field of sports; providing online journals, namely, blogs in the field of sports; online ticket agency services for entertainment, educational, sporting and cultural events; and novelty items, and have offered such goods and rendered such services in commerce.

7. As a result of extensive sales, advertising and promotion of its goods and services bearing or offered in connection with Opposer's Marks, as well as of the televised, streamed or radio broadcasts of games and the widespread media coverage of the Opposer's ROYALS club, Opposer's ROYALS club and Opposer's Marks have achieved widespread recognition and fame. As a consequence, Opposer has built up highly valuable goodwill in Opposer's Marks, which goodwill has become closely and uniquely identified and associated with Opposer.

8. Applicant, the National Women's Soccer League, is a professional women's soccer league that started play in 2013 with eight founding members, including the Kansas City franchise, FC Kansas City, which enjoyed one of the most successful franchises in the league, including winning consecutive championships in 2014 and 2015.

9. In January 2017, however, the FC Kansas City franchise was sold, and its fortunes waned.

10. On November 16, 2017, Applicant announced that it had granted a franchise license to an entity that would launch a new team in Salt Lake City for the 2018 season. Media reports indicated that the new team would replace the FC Kansas City franchise.

11. On November 20, 2017, Applicant further announced that it had reacquired FC Kansas City's interest in the league and that the team was ceasing operations. Applicant instead assigned the contract rights to FC Kansas City's players and draft picks to the new Salt Lake City team.

12. The next day, a lawyer who indicated that he was representing the new owner of the Salt Lake City team contacted an outside lawyer for Opposer. He indicated that he was clearing a name for a new women's soccer team and that the proposed name was UTAH ROYALS. He sought Opposer's agreement to the new name.

13. A week later, Opposer's outside counsel indicated to the lawyer for the new Salt Lake City team owner, that while he would follow up with Major League Baseball, he already knew that the Royals Club "is not in favor of this, and overall I would not encourage you to be very optimistic."

14. Despite the negative feedback, on December 1, 2017, Applicant filed the Applications to register Applicant's Mark and Applicant's Design Mark for Applicant's Goods and Applicant's Services (together "Applicant's Goods and Services"), based on an intent to use.

15. On December 1, 2017, Applicant also publicly announced the team name as UTAH ROYALS FC and unveiled the new team logo that is the subject of Application Serial Nos. 87704696 and 87704706 that incorporated a lion and crown design, two indicia strongly associated with Opposer's ROYALS club.

16. Upon information and belief, the adoption of the ROYALS name for the new franchise as well as indicia of a lion and crown design, indicia associated with Opposer, constituted an attempt to tie the name and logo to the former Kansas City location of the predecessor team it replaced by trading on the goodwill and recognition of Opposer's ROYALS club and Opposer's Marks.

17. Upon information and belief, Applicant did not use Applicant's Marks in commerce for the goods and services covered by the Applications prior to December 1, 2017, Applicant's constructive first use date.

18. Applicant's Goods and Services are identical and/or closely related to the goods offered and services rendered in connection with Opposer's Marks.

19. The word ROYALS in Applicant's Marks is identical to Opposer's ROYALS Marks. The word UTAH in Applicant's Marks is a geographic designation, as are the geographic designations used in certain of Opposer's Marks.

20. Applicant's Design Mark contains prominent uses of a lion and crown design as do certain of Opposer's Marks that feature crown designs or a lion mascot.

21. Applicant's Marks so resemble Opposer's Marks as to be likely, when used in connection with Applicant's Goods and Services, to cause confusion, to cause mistake, and to deceive the trade and public, who are likely to believe that Applicant's Goods and Services have their origin with Opposer and/or that such goods and services are approved, endorsed or sponsored by Opposer or associated in some way with Opposer. Opposer would thereby be injured by allowing the registration of Applicant's Marks.

22. Opposer's Marks are distinctive and famous and were so prior to December 1, 2017, Applicant's constructive first use date. Registration of Applicant's Mark and Applicant's

Design Mark will also injure Opposer by causing a likelihood of dilution by blurring of the distinctive quality of Opposer's Marks.

WHEREFORE, Opposer believes that it will be damaged by registration of Applicant's Mark and Applicant's Design Mark and requests that the opposition be sustained and said registrations be denied.

Please recognize as attorneys for Opposer in this proceeding Mary L. Kevlin, Richard S. Mandel and Joelle Milov (members of the bar of the State of New York) and the firm Cowan, Liebowitz & Latman, P.C., 114 West 47<sup>th</sup> Street, New York, New York 10036.

Please address all communications to Mary L. Kevlin, Esq. at the address listed below.

Dated: New York, New York  
August 29, 2018

Respectfully submitted,

COWAN LIEBOWITZ & LATMAN, P.C.  
*Attorneys for Opposer*

By:  / Robert J. English/

Mary L. Kevlin  
Richard S. Mandel  
Robert J. English  
Joelle Milov  
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New York, New York 10036  
(212)790-9200



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New York, NY 10036  
(212) 790-9200 Tel  
(212) 575-0671 Fax  
www.cll.com

August 29, 2018

**By Electronic Filing**

Commissioner for Trademarks  
Attn: TTAB  
P.O. Box 1451  
Alexandria, VA 22313-1451

Re: Kansas City Royals Baseball Corporation  
Consolidated Notice of Opposition Against  
National Women's Soccer League, LLC  
Applications to register  
UTAH ROYALS FC and UTAH ROYALS FC and Design  
Ref. No. 21307-119

Dear Commissioner:

We enclose a Consolidated Notice of Opposition against Application Serial Numbers 87704565, 87704569, 87704696 and 87704706 published in the Official Gazette on May 1, 2018. Contemporaneously with the electronic filing of this Notice of Opposition, we are arranging for an electronic payment in the amount of \$5,600 to cover the filing fee.

If the amount received is insufficient and additional fees are required, please charge our Deposit Account No. 03-3415.

Please address all future correspondence to the attention of Mary L. Kevlin of Cowan, Liebowitz & Latman, P.C.

Respectfully submitted,

/Robert J. English /  
Robert J. English

Enclosures

cc: Diane Kovach (w/encs.)  
Mary L. Kevlin, Esq. (w/encs.)  
Richard S. Mandel, Esq. (w/encs.)