

AO 120 (Rev. 08/10)

TO: Mail Stop 8 Director of the U.S. Patent and Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450	REPORT ON THE FILING OR DETERMINATION OF AN ACTION REGARDING A PATENT OR TRADEMARK
---	---

In Compliance with 35 U.S.C. § 290 and/or 15 U.S.C. § 1116 you are hereby advised that a court action has been
 filed in the U.S. District Court _____ for the Southern District of Florida _____ on the following

☒ Trademarks or ☐ Patents. (☐ the patent action involves 35 U.S.C. § 292.):

DOCKET NO. 25-CV-22390 JEM	DATE FILED 5/27/2025	U.S. DISTRICT COURT for the Southern District of Florida
PLAINTIFF Omega SA		DEFENDANT The Individual, Business Entity, or Unincorporated Association
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
1 25,036	7/24/1894	Omega SA
2 556,602	3/25/1952	Omega SA
3 566,370	11/4/1952	Omega SA
4 578,041	7/28/1953	Omega SA
5 672,487	1/13/1959	Omega SA

In the above—entitled case, the following patent(s)/ trademark(s) have been included:

DATE INCLUDED	INCLUDED BY ☐ Amendment ☐ Answer ☐ Cross Bill ☐ Other Pleading	
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
1 734,891	7/24/1962	Omega SA
2 1,309,929	12/18/1984	Omega SA
3 3,085,659	4/25/2006	Omega SA
4 3,640,080	6/16/2009	Omega SA
5		(see attached Exhibit List)

In the above—entitled case, the following decision has been rendered or judgement issued:

DECISION/JUDGEMENT

CLERK Angela Noble	(BY) DEPUTY CLERK Patricia Curtis	DATE 5/27/2025
-----------------------	--------------------------------------	-------------------

Copy 1—Upon initiation of action, mail this copy to Director Copy 3—Upon termination of action, mail this copy to Director
 Copy 2—Upon filing document adding patent(s), mail this copy to Director Copy 4—Case file copy

Print

Save As...

Reset

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.**

25-CV-22390 MARTINEZ

OMEGA SA,

Plaintiff,

vs.

THE INDIVIDUAL, BUSINESS ENTITY, OR
UNINCORPORATED ASSOCIATION d/b/a THE
E-COMMERCE STORE NAMES IDENTIFIED
ON SCHEDULE “A,”

Defendant.

_____ /

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

Plaintiff, Omega SA (“Omega” or “Plaintiff”) hereby sues Defendant, the Individual, Business Entity, or Unincorporated Association doing business as the e-commerce store names identified on Schedule “A” (the “Defendant”). Defendant is promoting, selling, offering for sale, and/or distributing goods using counterfeits and confusingly similar imitations of Omega’s trademarks within this district through various commercial Internet based e-commerce stores operating under the seller names identified on Schedule “A” hereto (the “Selling E-commerce Store Names”). Additionally, Defendant has set up a transaction laundering scheme with intermediary or “middleman” e-commerce stores, including at least the intermediary e-commerce stores identified on Schedule “A” hereto (the “Intermediary E-commerce Store Names”), re-routing the payment processing for purchases of counterfeit Omega-branded goods from the Selling E-commerce Store Names to the Intermediary E-commerce Store Names (the Selling E-commerce Store Names and the Intermediary E-commerce Store Names are collectively referred to herein as the “E-commerce Store Names”). In support of its claims, Omega alleges as follows:

JURISDICTION AND VENUE

1. This is an action for damages and injunctive relief for federal trademark counterfeiting and infringement, false designation of origin, common law unfair competition and common law trademark infringement pursuant to 15 U.S.C. §§ 1114, 1116, and 1125(a), The All Writs Act, 28 U.S.C. § 1651(a), and Florida's common law. Accordingly, this Court has subject matter jurisdiction over this action pursuant to 15 U.S.C. § 1121 and 28 U.S.C. §§ 1331 and 1338. This Court has supplemental jurisdiction pursuant to 28 U.S.C. §1367 over Omega's state law claims because those claims are so related to the federal claims that they form part of the same case or controversy.

2. Defendant is subject to personal jurisdiction in this district, because it directs business activities toward and conducts business with consumers throughout the United States, including within the State of Florida and this district through at least its e-commerce stores accessible and doing business in Florida and operating under its E-commerce Store Names. Alternatively, based on its overall contacts with the United States, Defendant is subject to personal jurisdiction in this district pursuant to Federal Rule of Civil Procedure 4(k)(2) because (i) Defendant is not subject to jurisdiction in any state's court of general jurisdiction; and (ii) exercising jurisdiction is consistent with the United States Constitution and laws.

3. Venue is proper in this Court pursuant to 28 U.S.C. § 1391 since Defendant is, upon information and belief, a non-resident in the United States and engaged in infringing activities and causing harm within this district by advertising, offering to sell, selling and/or shipping infringing products into this district.

THE PLAINTIFF

4. Omega is a corporation organized under the laws of Switzerland with its principal place of business located at Jakob-Stämpfli-Strasse 96, CH-2502 Biel/Bienne, Switzerland. Omega manufactures, markets, and sells goods throughout the world, including within this district, under multiple world-famous common law and federally registered trademarks, including the trademarks identified in Paragraph 15 below.

5. Omega's goods are sold through various channels of trade within the State of Florida, including this district. Defendant, through the offer to sell and sale of counterfeit and infringing versions of Omega branded products, is directly and unfairly competing with Omega's economic interests in the United States, including within the State of Florida and causing Omega irreparable harm and damage within this jurisdiction.

6. Like many other famous trademark owners, Omega suffers ongoing daily and sustained violations of its trademark rights at the hands of counterfeiters and infringers, such as Defendant herein, who wrongfully reproduce and counterfeit Omega's trademarks for the twin purposes of (i) duping and confusing the consuming public and (ii) earning substantial profits across their e-commerce stores. The natural and intended byproduct of Defendant's actions is the erosion and destruction of the goodwill associated with Omega's name and trademarks, as well as the destruction of the legitimate market sector in which it operates.

7. To combat the harm caused by the actions of Defendant and others engaging in similar conduct, each year Omega expends significant resources in connection with trademark enforcement efforts, including legal fees, investigative fees, and support mechanisms for law enforcement. The exponential growth of counterfeiting over the Internet, including through online marketplace and social media platforms, has created an environment that requires companies, such

as Omega, to expend significant resources across a wide spectrum of efforts in order to protect both consumers and itself from the confusion and the erosion of the goodwill embodied in Omega's brand.

THE DEFENDANT

8. Defendant is an individual, business entity of unknown makeup, or unincorporated association who, upon information and belief, either resides and/or operates in a foreign jurisdiction, redistributes products from the same or similar sources in that locations, and/or ship its goods from the same or similar sources in those locations to consumers as well as shipping and fulfillment centers within the United States. Defendant has the capacity to be sued pursuant to Federal Rule of Civil Procedure 17(b). Defendant targets its business activities towards consumers throughout the United States, including within this district, through at least, the operation of commercial Internet based e-commerce stores under its Selling E-commerce Store Names and using the Intermediary E-commerce Store Names in connection therewith.

9. Defendant operates the Selling E-commerce Store Names in tandem with the payment Intermediary E-commerce Store Names thereby creating an interconnected ecosystem.

10. Defendant uses aliases in conjunction with the operation of its business including but not limited to those identified on Schedule "A."

11. Defendant is the past and/or present controlling force behind the operation of the E-commerce Store Names and the sale of products using counterfeits and infringements of Omega's trademarks as described herein.

12. Defendant directly engages in unfair competition with Omega by advertising, offering for sale, and selling goods using counterfeits and infringements of Omega's trademarks to consumers within the United States and this district through the e-commerce stores using, at

least, its E-commerce Store Names, and additional e-commerce stores or aliases not yet known to Omega. Defendant has purposefully directed some portion of its unlawful activities toward consumers in the State of Florida through the advertisement, offer to sell, sale, and/or shipment of counterfeit and infringing Omega branded goods into the State.

13. Defendant has registered, established, or purchased, and maintained its E-commerce Store Names. Defendant may have engaged in fraudulent conduct with respect to the registration of its E-commerce Store Names by providing false and/or misleading information during the registration or maintenance process related to its E-commerce Store Names. Defendant has registered and/or maintained its E-commerce Store Names for the sole purpose of engaging in unlawful infringing and counterfeiting activities.

14. Defendant will likely continue to register or acquire new e-commerce store names or aliases, as well as related payment accounts, for the purpose of selling and offering for sale goods using counterfeit and confusingly similar imitations of Omega's trademarks unless preliminarily and permanently enjoined.

15. Defendant's E-commerce Store Names, associated payment accounts, and any other alias e-commerce store names used in connection with the sale of counterfeit and infringing goods using Omega's trademarks, are essential components of Defendant's online activities and are the means by which Defendant furthers its counterfeiting and infringement scheme and causes harm to Omega. Moreover, Defendant uses Omega's famous name and/or trademarks to drive Internet consumer traffic to the e-commerce stores operating under its E-commerce Store Names, thereby increasing the value of its E-commerce Store Names and decreasing the size and value of Omega's legitimate marketplace at Omega's expense.

COMMON FACTUAL ALLEGATIONS**Omega's Rights**

16. Omega is the owner of the following trademarks which are valid and registered on the Principal Register of the United States Patent and Trademark Office (the "Omega Marks"):

Trademark	Registration Number	Registration Date	Class / Goods
	025,036	July 24, 1894	IC 014. Watch movements and watch cases.
SEAMASTER	556,602	March 25, 1952	IC 014. Watches, watch parts and watch movements.
OMEGA	566,370	November 4, 1952	IC 014. Watches and parts thereof.
	578,041	July 28, 1953	IC 014. wrist watches with or without straps, bands or bracelets, chronometers, chronographs.
SPEEDMASTER	672,487	January 13, 1959	IC 014. Watches and clocks.
	734,891	July 24, 1962	IC 014. Timepieces and Parts Thereof.
DE VILLE	1,309,929	December 18, 1984	IC 014. Watches, Wrist Watches, Portfolio Watches, Pendant Watches, and Miniature Clocks; and Parts Thereof.
PLANET OCEAN	3,085,659	April 25, 2006	IC 014. Watches and watch parts.
SEAMASTER	3,640,080	June 16, 2009	IC 014. Jewelry, horological and chronometrical instruments.
AQUA TERRA	4,299,644	March 12, 2013	IC 014. Watches, watch straps, watch bracelets and parts thereof, chronometers, chronographs for use as watches, watches made of precious metals, watches partly or entirely set with precious stones.
CO-AXIAL	4,442,192	December 3, 2013	IC 014. Horological and chronometric instruments.
DARK SIDE OF THE MOON	4,735,993	May 12, 2015	IC 014. Horological and chronometric instruments.

	5,094,915	December 6, 2016	IC 014. Horological and chronometric instruments and parts for the aforesaid goods; accessories namely, watch chains, presentation cases for watches and cases for watches.
MOONWATCH	5,211,480	May 30, 2017	IC 014. Horological and chronometric instruments
CO-AXIAL MASTER CHRONOMETER	5,266,563	August 15, 2017	IC 014. Horological and chronometric instruments.

The Omega Marks are used in connection with the manufacture and distribution of high-quality goods in the category identified above. True and correct copies of the Certificates of Registration for the Omega Marks are attached hereto as Composite Exhibit “1.”

17. Long before Defendant began its infringing activities complained of herein, the Omega Marks have been used by Omega in interstate commerce to identify and distinguish Omega’s high-quality goods for an extended period of time and serve as symbols of Omega’s quality, reputation and goodwill.

18. Omega has expended substantial resources developing, advertising, and otherwise promoting the Omega Marks. Omega and related companies have spent significant monetary resources to extensively advertise and promote products under the Omega Marks in magazines, newspapers, in stores, on the Internet and in other media worldwide, including Omega’s official website, www.omegawatches.com. The Omega Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

19. Further, Omega extensively uses, advertises, and promotes the Omega Marks in the United States in connection with the sale of high-quality goods. As a result, the Omega Marks are widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning among consumers as identifiers of high-quality goods.

20. Omega has carefully monitored and policed the use of the Omega Marks and has never assigned or licensed the Omega Marks to Defendant.

21. Genuine goods using the Omega Marks are widely legitimately advertised and promoted by Omega and related companies, authorized distributors and unrelated third parties via the Internet. Visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing is important to Omega's overall marketing and consumer education efforts. Thus, Omega and related companies expend significant monetary and other resources on Internet marketing and consumer education, including search engine optimization and search engine marketing strategies. Those strategies allow Omega and its authorized retailers to educate consumers fairly and legitimately about the value associated with the Omega Marks and the goods sold thereunder.

Defendant's Infringing Activities

22. Defendant is promoting, advertising, distributing, offering for sale and/or selling goods in interstate commerce using counterfeits and confusingly similar imitations of the Omega Marks (the "Counterfeit Goods") through at least the e-commerce stores operating under its Selling E-commerce Store Names and using the Intermediary E-commerce Store Names in connection therewith. Specifically, Defendant is using the Omega Marks to initially attract online consumers and drive them to Defendant's e-commerce stores operating under its Selling E-commerce Store Names. Defendant is using identical copies of the Omega Marks for different quality goods. Omega has used the Omega Marks extensively and continuously before Defendant began offering counterfeit and confusingly similar imitations of Omega's goods.

23. Defendant's Counterfeit Goods are of a quality substantially different than that of Omega's genuine goods. Defendant is actively using, promoting and otherwise advertising,

distributing, offering for sale and/or selling substantial quantities of its Counterfeit Goods with the knowledge and intent that such goods will be mistaken for the genuine, high-quality goods offered for sale by Omega despite Defendant's knowledge that it is without authority to use the Omega Marks. Defendant's actions are likely to cause confusion of consumers at the time of initial interest, sale, and in the post-sale setting, who will believe Defendant's goods are genuine goods originating from, associated with, and/or approved by Omega.

24. Defendant advertises its e-commerce stores, including its Counterfeit Goods, to the consuming public via at least the e-commerce stores under its E-commerce Store Names. In so doing, Defendant improperly and unlawfully uses the Omega Marks without Omega's authority.

25. Defendant is employing and benefiting from advertising and marketing strategies based, in large measure, upon an unauthorized use of counterfeits and infringements of the Omega Marks. Specifically, Defendant is using counterfeits and infringements of the Omega Marks to make its e-commerce stores selling unlawful goods appear more relevant and attractive to consumers searching for Omega's related goods and information online. Defendant is causing harm to Omega and the consuming public by (i) depriving Omega of its right to fairly compete for space online and reducing the visibility of Omega's genuine goods on the World Wide Web, (ii) causing an overall degradation of the value of the goodwill associated with the Omega Marks, and (iii) increasing Omega's overall cost to market its goods and educate consumers about its brand via the Internet.

26. Additionally, Defendant is using its Intermediary E-commerce Store Names to reroute the payment processing for the sale of goods bearing counterfeits and confusingly similar imitations of Omega's trademarks purchased through the Selling E-commerce Store Names. Because the Intermediary E-commerce Store Names themselves do not show counterfeit omega

branded goods offered for sale, Defendants can create an aura of legitimacy and evade detection of payment origination to provide payment processors and related financial institutions with the appearance that the goods they are selling are non-infringing items. Ultimately, the Intermediary E-commerce Store Names allow Defendants to circumvent financial regulations by creating a separate payment microecosystem for the sole purpose of managing payment processing for the Selling E-commerce Store Names.

27. Defendant is conducting and targeting its counterfeiting and infringing activities toward consumers and causing harm within this district and elsewhere throughout the United States. As a result, Defendant is defrauding Omega, the relevant payment processors and financial institutions, and the consuming public for Defendant's own benefit.

28. At all times relevant hereto, Defendant had full knowledge of Omega's ownership of the Omega Marks, including its exclusive right to use and license such intellectual property and the goodwill associated therewith.

29. Defendant's use of the Omega Marks, including the promotion and advertisement, reproduction, distribution, sale, and offering for sale of its Counterfeit Goods, is without Omega's consent or authorization.

30. Defendant is engaging in the above-described unlawful counterfeiting and infringing activities knowingly and intentionally or with reckless disregard or willful blindness to Omega's rights for the purpose of trading on Omega's goodwill and reputation.

31. Defendant's above identified infringing activities are likely to cause confusion, deception and mistake in the minds of consumers before, during, and after the time of purchase. Moreover, Defendant's wrongful conduct is likely to create a false impression and deceive

consumers, the public, and the trade into believing there is a connection or association between Omega's genuine goods and Defendant's Counterfeit Goods, which there is not.

32. Defendant's payment and financial accounts, including but not limited to those specifically set forth on Schedule "A," are being used by Defendant to accept, receive, and deposit profits from its trademark counterfeiting and infringing, and unfairly competitive activities connected to its E-commerce Store Names and any other alias e-commerce store names it uses and/or controls.

33. Further, Defendant, upon information and belief, is likely to transfer or secret its assets to avoid payment of any monetary judgment awarded to Omega.

34. Omega has no adequate remedy at law.

35. Omega is suffering irreparable injury and has suffered substantial damages because of Defendant's unauthorized and wrongful use of the Omega Marks. If Defendant's counterfeiting and infringing, and unfairly competitive activities are not preliminarily and permanently enjoined by this Court, Omega and the consuming public will continue to be harmed while Defendant wrongfully earns a substantial profit.

36. The harm and damages sustained by Omega have been directly and proximately caused by Defendant's wrongful reproduction, use, advertisement, promotion, offers to sell, and sale of its Counterfeit Goods.

**COUNT I - TRADEMARK COUNTERFEITING AND INFRINGEMENT
PURSUANT TO § 32 OF THE LANHAM ACT (15 U.S.C. § 1114)**

37. Omega hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 36 above.

38. This is an action for trademark counterfeiting and infringement against Defendant based on its use of counterfeit and confusingly similar imitations of the Omega Marks in commerce

in connection with the promotion, advertisement, distribution, offering for sale and/or sale of the Counterfeit Goods.

39. Defendant is promoting and otherwise advertising, selling, offering for sale, and distributing goods using counterfeits and/or infringements of the Omega Marks. Defendant is continuously infringing and inducing others to infringe the Omega Marks by using the Omega Marks to advertise, promote, offer to sell and/or sell counterfeit and infringing versions of Omega's branded goods.

40. Defendant's counterfeiting and infringing activities are likely to cause and are causing confusion, mistake, and deception among members of the trade and the general consuming public as to the origin and quality of Defendant's Counterfeit Goods.

41. Defendant's unlawful actions have caused and are continuing to cause unquantifiable damages and irreparable harm to Omega and are unjustly enriching Defendant with profits at Omega's expense.

42. Defendant's above-described unlawful actions constitute counterfeiting and infringement of the Omega Marks in violation of Omega's rights under § 32 of the Lanham Act, 15 U.S.C. § 1114.

43. Omega has no adequate remedy at law. Omega has suffered and will continue to suffer irreparable injury and damages because of Defendant's above-described activities if Defendant is not preliminarily and permanently enjoined. Additionally, Defendant will continue to wrongfully profit from its unlawful activities.

**COUNT II - FALSE DESIGNATION OF ORIGIN
PURSUANT TO § 43(a) OF THE LANHAM ACT (15 U.S.C. § 1125(a))**

44. Omega hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 36 above.

45. Defendant's Counterfeit Goods bearing, offered for sale, and sold using copies of the Omega Marks have been widely advertised and offered for sale throughout the United States via the Internet.

46. Defendant's Counterfeit Goods bearing, offered for sale, and sold using copies of the Omega Marks are virtually identical in appearance to Omega's genuine goods. However, Defendant's Counterfeit Goods are different in quality. Accordingly, Defendant's activities are likely to cause confusion among consumers as to at least the origin or sponsorship of its Counterfeit Goods.

47. Defendant has used in connection with its advertisement, offer for sale, and sale of the Counterfeit Goods, false designations of origin and false descriptions and representations, including words or symbols and trade dress which falsely describe or represent such goods and have caused such goods to enter commerce in the United States with full knowledge of the falsity of such designations of origin and such descriptions and representations, all to Omega's detriment.

48. Defendant has authorized infringing uses of the Omega Marks in Defendant's advertisement and promotion of its counterfeit and infringing branded goods. Defendant has also misrepresented to members of the consuming public that the Counterfeit Goods it advertises and sells are genuine, non-infringing goods.

49. Additionally, Defendant is using counterfeits and infringements of the Omega Marks to unfairly compete with Omega and others for space on the World Wide Web. Defendant is thereby (i) depriving Omega of valuable marketing and educational space online which would otherwise be available to Omega, and (ii) reducing the visibility of Omega's genuine goods on the World Wide Web and across social media platforms.

50. Defendant's above-described actions are in violation of Section 43(a) of the Lanham Act, 15 U.S.C. §1125(a).

51. Omega has no adequate remedy at law. Omega has suffered and will continue to suffer injury and damages caused by Defendant's conduct if Defendant is not preliminarily and permanently enjoined. Additionally, Defendant will continue to wrongfully profit from its unlawful activities.

COUNT III - COMMON LAW UNFAIR COMPETITION

52. Omega hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 36 above.

53. This is an action against Defendant based on its promotion, advertisement, distribution, offering for sale, and/or sale of goods using or bearing marks which are virtually identical to the Omega Marks in violation of Florida's common law of unfair competition.

54. Specifically, Defendant is promoting and otherwise advertising, selling, offering for sale, and distributing infringing and counterfeit versions of Omega's branded goods. Defendant is also using counterfeits and infringements of the Omega Marks to unfairly compete with Omega for visibility on the World Wide Web.

55. Defendant's infringing activities are likely to cause and is causing confusion, mistake, and deception among consumers as to the origin and quality of Defendant's e-commerce stores as a whole and all products sold therein by its use of the Omega Marks.

56. Omega has no adequate remedy at law. Omega has suffered and will continue to suffer irreparable injury and damages because of Defendant's above-described activities if Defendant is not preliminarily and permanently enjoined. Additionally, Defendant will continue to wrongfully profit from its unlawful activities.

COUNT IV - COMMON LAW TRADEMARK INFRINGEMENT

57. Omega hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 36 above.

58. Omega is the owner of all common law rights in and to the Omega Marks.

59. This is an action for common law trademark infringement against Defendant based on its promotion, advertisement, offering for sale, and/or sale of its Counterfeit Goods using the Omega Marks.

60. Specifically, Defendant is promoting and otherwise advertising, distributing, offering for sale, and selling goods using and bearing infringements of the Omega Marks.

61. Defendant's infringing activities are likely to cause and are causing confusion, mistake, and deception among consumers as to the origin and quality of Defendant's Counterfeit Goods bearing the Omega Marks.

62. Omega has no adequate remedy at law. Omega has suffered and will continue to suffer irreparable injury and damages because of Defendant's above-described activities if Defendant is not preliminarily and permanently enjoined. Additionally, Defendant will continue to wrongfully profit from its unlawful activities.

PRAYER FOR RELIEF

63. WHEREFORE, Omega demands judgment on all Counts of this Complaint and an award of equitable relief and monetary relief against Defendant as follows:

a. Entry of temporary, preliminary, and permanent injunctions pursuant to 15 U.S.C. § 1116, 28 U.S.C. § 1651(a), The All Writs Act, and Federal Rule of Civil Procedure 65 enjoining Defendant, its agents, representatives, servants, employees, and all those acting in concert or participation therewith, from manufacturing or causing to be manufactured, importing,

advertising or promoting, distributing, selling or offering to sell their Counterfeit Goods; from infringing, counterfeiting, or diluting the Omega Marks; from using the Omega Marks, or any mark or design similar thereto, in connection with the sale of any unauthorized goods; from using any logo, trade name or trademark or design that may be calculated to falsely advertise the services or goods of Defendant as being sponsored by, authorized by, endorsed by, or in any way associated with Omega; from falsely representing themselves as being connected with Omega, through sponsorship or association, or engaging in any act that is likely to falsely cause members of the trade and/or of the purchasing public to believe any goods or services of Defendant are in any way endorsed by, approved by, and/or associated with Omega; from using any reproduction, counterfeit, infringement, copy, or colorable imitation of the Omega Marks in connection with the publicity, promotion, sale, or advertising of any goods sold by Defendant; from affixing, applying, annexing or using in connection with the sale of any goods, a false description or representation, including words or other symbols tending to falsely describe or represent Defendant's goods as being those of Omega, or in any way endorsed by Omega and from offering such goods in commerce; from engaging in search engine optimization strategies using colorable imitations of Omega's name or trademarks; and from otherwise unfairly competing with Omega.

b. Entry of temporary, preliminary, and permanent injunctions pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, enjoining Defendant and all third parties with actual notice of an injunction issued by the Court from participating in, including providing financial services, technical services or other support to, Defendant in connection with the sale and distribution of non-genuine goods bearing and/or using counterfeits of the Omega Marks.

c. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority that upon Omega's request, those acting in concert or participation as service providers to Defendant, who have notice of the injunction, cease hosting, facilitating access to, or providing any supporting service to any and all e-commerce stores, including but not limited to its E-commerce Store Names, through which Defendant engages in the promotion, offering for sale and/or sale of goods bearing and/or using counterfeits and/or infringements of the Omega Marks

d. Entry of an order pursuant to 15 U.S.C. § 1116, 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, that, upon Omega's request, Defendant and the top level domain (TLD) Registry for the E-commerce Store Names, including backend registry operators or administrators, place the E-commerce Store Names on Registry Hold status for the remainder of the registration period for any such domain name, thus removing them from the TLD zone files which link the E-commerce Store Names, or disable and/or cease facilitating access to the E-commerce Store Names, and any other e-commerce store name or domain names being used and/or controlled by Defendant to engage in the business of marketing, offering to sell, and/or selling goods bearing counterfeits and infringements of the Omega Marks, to the IP addresses where the associated e-commerce stores or websites are hosted.

e. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, canceling for the life of the current registration or, at Omega's election, transferring the E-commerce Store Names, and any other e-commerce store names or domain names used by Defendant to engage in its counterfeiting of the Omega Marks, to Omega's control so they may no longer be used for unlawful purposes.

f. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority authorizing Omega to upload new files to the Intermediary E-commerce Store Names for the purpose of preventing further redirections and identifying all of the e-commerce stores used by Defendants in connection with the sale of counterfeit and infringing Omega-branded goods that reroute to the payment Intermediary E-commerce Store Names.

g. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, authorizing Omega to serve an injunction issued by the Court on any e-mail service provider with a request that the service provider permanently suspend the e-mail addresses which are or have been used by Defendant in connection with Defendant's promotion, offering for sale, and/or sale of goods using counterfeits, and/or infringements of the Omega Marks.

h. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority authorizing Omega to serve the injunction on the e-commerce store registrar(s) and/or the privacy protection service(s) for the E-commerce Store Names to disclose to Omega the true identities and contact information for the registrants of the E-commerce Store Names.

i. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, that, upon Omega's request, any Internet marketplace website operators and/or administrators, registrars, TLD Registries, and/or the privacy protection services for the E-commerce Store Names, who are provided with notice of an injunction issued by the Court, identify any e-mail address known to be associated with Defendant's E-commerce Store Names.

j. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, authorizing Omega to request any Internet search engines which are provided with notice of the order, to permanently disable, de-index or delist all URLs of the E-commerce Store Names by Defendant to promote, offer for sale and/or sell goods bearing counterfeits and/or infringements of the Omega Marks, based upon Defendant's unlawful activities being conducted via the E-commerce Store Names as a whole and via the URLs identified by Omega.

k. Entry of an order pursuant to 15 U.S.C. § 1116 and the Court's inherent authority, requiring Defendant, its agent(s) or assign(s), to assign all rights, title, and interest, to their E-commerce Store Name(s), and any other e-commerce store names being used by Defendant to engage in the business of marketing, offering to sell, and/or selling goods bearing counterfeits and infringements of the Omega Marks, to Omega and, if within five (5) days of entry of such order Defendant fails to make such an assignment, the Court order the act to be done by another person appointed by the Court at Defendant's expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a).

l. Entry of an order pursuant to 15 U.S.C. § 1116 and the Court's inherent authority, requiring Defendant, its agent(s) or assign(s), to instruct in writing, all search engines to permanently delist or deindex the E-commerce Store Name(s), and any other e-commerce store names or domains names being used by Defendant to engage in the business of marketing, offering to sell, and/or selling goods bearing counterfeits and infringements of the Omega Marks, and, if within five (5) days of entry of such order Defendant fails to make such a written instruction, the Court order the act to be done by another person appointed by the Court at Defendant's expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a).

m. Entry of an order pursuant to 15 U.S.C. § 1116 and the Court's inherent authority, requiring, upon Omega's request, Defendant to request in writing permanent termination of any messaging services, e-commerce Store Names, usernames, and social media accounts it owns, operates, or controls on any messaging service and social media platform.

n. Entry of an order requiring Defendant to account to and pay Omega for all profits and damages resulting from Defendant's trademark counterfeiting and infringing and unfairly competitive activities and that the award to Omega be trebled, as provided for under 15 U.S.C. §1117, or that Omega be awarded statutory damages from Defendant in the amount of two million dollars (\$2,000,000.00) per each counterfeit trademark used and product type offered for sale or sold, as provided by 15 U.S.C. §1117(c)(2) of the Lanham Act.

o. Entry of an award pursuant to 15 U.S.C. § 1117 (a) and (b) of Omega's costs and reasonable attorneys' fees and investigative fees associated with bringing this action.

p. Entry of an order pursuant to 15 U.S.C. § 1116, 28 U.S.C. § 1651(a), The All Writs Act, Federal Rule of Civil Procedure 65, and the Court's inherent authority that, upon Omega's request, Defendant and any financial institutions, payment processors, banks, escrow services, money transmitters, e-commerce shipping partner, fulfillment center, warehouse, storage facility, or marketplace platforms, and their related companies and affiliates, identify, restrain, and be required to surrender to Omega all funds,, up to and including the total amount of judgment, in all financial accounts and/or sub-accounts used in connection with the E-commerce Store Names, or other alias e-commerce store names, domain names and/or websites used by Defendant presently or in the future, as well as any other related accounts of the same customer(s) and any other accounts which transfer funds into the same financial institution account(s), and remain

restrained until such funds are surrendered to Omega in partial satisfaction of the monetary judgment entered herein.

q. Entry of an award of pre-judgment interest on the judgment amount.

r. Entry of an order requiring Defendant, at Omega's request, to pay the cost necessary to correct any erroneous impression the consuming public may have received or derived concerning the nature, characteristics, or qualities of Defendant's products, including without limitation, the placement of corrective advertising and providing written notice to the public.

s. Entry of an order for any further relief as the Court may deem just and proper.

DATED: May 27, 2025.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Stephen M. Gaffigan**

Stephen M. Gaffigan (Fla. Bar No. 025844)

Virgilio Gigante (Fla. Bar No. 082635)

T. Raquel Wiborg-Rodriguez (Fla. Bar. No. 103372)

401 East Las Olas Blvd., Suite 130-453

Ft. Lauderdale, Florida 33301

Telephone: (954) 767-4819

E-mail: Stephen@smgpa.cloud

E-mail: Leo@smgpa.cloud

E-mail: Raquel@smgpa.cloud

Attorneys for Plaintiff, Omega SA

SCHEDULE “A”

[This page is the subject of Plaintiff’s Motion to File Under Seal. As such, this page has been redacted in accordance with L.R. 5.4(b)(1)]

Composite Exhibit 1

original

Renewed to
Societe Anonyme Louis Brandt & Frere Omega Watch Co.
Renewed July 24-1944 to Societe Anonyme Louis Brandt
& Frere Omega Watch Co., an organized company of
Switzerland.

UNITED STATES PATENT OFFICE.

LOUIS BRANDT & FRÈRE, OF BIENNE, SWITZERLAND.

TRADE-MARK FOR WATCH-MOVEMENTS AND WATCHCASES.

STATEMENT and DECLARATION of Trade-Mark No. 25,036, registered July 24, 1894.

Application filed May 23, 1894.

STATEMENT.

To all whom it may concern:

Be it known that we, LOUIS BRANDT & FRÈRE, a firm domiciled and doing business in Bienne, Switzerland, have adopted for our use a Trade-Mark for Watch-Movements and Watchcases, of which the following is a full, clear, and exact specification.

Our trade-mark consists of the arbitrary sign of the last letter of the Greek alphabet. This has generally been arranged as shown in the accompanying fac-simile, in which it appears above the word "Omega." But it may be differently arranged and the word "Omega" may be omitted without materially altering the character of our trade-mark, the essential feature of which is the Greek letter "Ω."

This trade-mark has been continuously used by us in our business since March 10, 1894.

The class of merchandise to which this trade-mark is appropriated is horology, and the particular description of goods comprised in such class on which it is used by us is watch-movements and watch-cases. It is usually affixed to the goods by stamping or by printing it upon suitable labels which are afterward placed upon the packages containing the articles.

Signed this 2d day of May, 1894.

LOUIS BRANDT & FRÈRE.

Witnesses:

EDOUARD HAAS,
ALF. H. BESSIR.

DECLARATION.

United States consulate Berne Switzerland ss.

LOUIS PAUL BRANDT being duly sworn deposes and says that he is a member of the firm of LOUIS BRANDT AND FRÈRE, the applicants named in the foregoing statement; that he verily believes that the foregoing statement is true; that the said firm has at this time a right to the use of the trade-mark therein described; that no other person, firm or corporation has the right to such use, either in the identical form or in any such near resemblance thereto as might be calculated to deceive; that it is

used by the applicants in commerce between the United States and foreign nations and particularly with Switzerland; and that the description and fac-simile presented for record truly represent the trade-mark sought to be registered.

LOUIS PAUL BRANDT.

Sworn to and subscribed before me this 14th day of June, 1894.

[L. S.]

JOHN E. HINNEN,
U. S. Vice-Consul.

Republished, under the Act of 1946, Jan. 17, 1950, by
Omega Louis Brandt & Frere, S. A., Bienne, Switzerland.

New Certificate issued November 18, 1952, under Sec. 7c for unexpired term to Omega Louis Brandt & Frere S. A., of Biemme, Switzerland, a corporation of Switzerland, by change of name from Societe Anonyme Louis Brandt & Frere Omega Watch Co.

Int. Cl.: 14

Prior U.S. Cl.: 27

United States Patent and Trademark Office

10 Year Renewal

Reg. No. 556,602

Registered Mar. 25, 1952

Renewal Term Begins Mar. 25, 1992

**TRADEMARK
PRINCIPAL REGISTER**

SEAMASTER

OMEGA SA (SWITZERLAND CORPO-
RATION)

96 RUE STAEMPFLI

2503 BIENNE, SWITZERLAND. BY
CHANGE OF NAME FROM OMEGA
LOUIS BRANDT & FRERE, S. A.
(SWITZERLAND CORPORATION)
BIENNE, SWITZERLAND

FOR: WATCHES, WATCH PARTS
AND WATCH MOVEMENTS, IN CLASS
27 (INT. CL. 14).

FIRST USE 3-25-1949; IN COMMERCE
3-25-1949.

SER. NO. 71-596,436, FILED 4-27-1950.

*In testimony whereof I have hereunto set my hand
and caused the seal of The Patent and Trademark
Office to be affixed on Apr. 21, 1992.*

COMMISSIONER OF PATENTS AND TRADEMARKS

Registered Mar. 25, 1952

Registration No. 556,602

PRINCIPAL REGISTER
Trade-Mark

UNITED STATES PATENT OFFICE

Omega Louis Brandt & Frere, S. A.,
Biel, Switzerland

Act of 1946

Application April 27, 1950, Serial No. 596,436

SEAMASTER

STATEMENT

Omega Louis Brandt & Frere, S. A., a corporation duly organized under the laws of the Republic of Switzerland, located and doing business at Bienne, Switzerland, has adopted and is using the trade-mark shown in the accompanying drawing, for WATCHES, WATCH PARTS AND WATCH MOVEMENTS, in Class 27, Horological instruments, and presents herewith five specimens (or facsimiles) showing the trade-mark as actually used in connection with such goods, the trade-mark being applied to labels attached to packages containing the goods, or to circulars enclosed with packages containing the goods, and requests that the same be registered in the United States Patent Office on the Principal Register in accordance with the act of July 5, 1946.

The trade-mark was first used on March 25, 1949, and was first used in commerce between Switzerland and the United States which may lawfully be regulated by Congress on March 25, 1949, and was first used in Switzerland in May 1949.

Mock & Blum, whose postal address is 10 East 40th Street, New York 16, N. Y., is designated as applicant's representative on whom notice or process in proceeding affecting the mark may be served.

OMEGA LOUIS BRANDT & FRERE, S. A.,
By ADOLPHE VALLAT,
Managing Director.

COMB. AFF. SEC. 8 & 15

APR 16 1957



United States Patent and Trademark Office
[Home](#) | [Site Index](#) | [Search](#) | [Guides](#) | [Contacts](#) | [eBusiness](#) | [eBiz alerts](#) | [News](#) | [Help](#)



Assignments on the Web > [Trademark Query](#)

Trademark Assignment Abstract of Title

Total Assignments: 1
Serial #: [71596436](#) **Filing Dt:** 04/27/1950 **Reg #:** [556602](#) **Reg. Dt:** 03/25/1952
Registrant: OMEGA LOUIS BRANDT & FRERE, S. A.
Mark: SEAMASTER

Assignment: 1

Reel / Frame: [0444/0955](#) **Recorded:** 05/05/1983 **Pages:** 3
Conveyance: CHANGE OF NAME 19820624
Assignor: [OMEGA LOUIS BRANDT & FRERE S.A.](#) **Exec Dt:** 03/16/1983
Assignee: [OMEGA SA \(OMEGA AG\) \(OMEGA LTD.\)](#) **Entity Type:** UNKNOWN
 Citizenship: NONE
 Entity Type: UNKNOWN
 Citizenship: NONE

Correspondent: HENRY L. SHENIER
SHENIER & O'CONNOR
380 LEXINGTON AVE.
NEW YORK, NY 10168
SHENIER AND O'CONNOR

Search Results as of: 11/15/2018 12:09 PM
If you have any comments or questions concerning the data displayed, contact PRD / Assignments at 571-272-3350. v.2.6
Web interface last modified: August 25, 2017 v.2.6

Registered Nov. 4, 1952.

Registration No. 566,370

PRINCIPAL REGISTER
Trade-Mark

UNITED STATES PATENT OFFICE

Omega Louis Brandt & Frère, S. A.,
Bienne, Switzerland

Act of 1946

Application December 8, 1951, Serial No. 622,275

OMEGA

STATEMENT

Omega Louis Brandt & Frère, S. A., a Swiss corporation, located and doing business at Bienne, Switzerland, has adopted and is using the trade-mark shown in the accompanying drawing, for WATCHES AND PARTS THEREOF, in Class 27, Horological instruments, and presents herewith five specimens showing the trade-mark as actually used in connection with such goods, the trade-mark being applied by stamping, printing or engraving the same on the goods and by printing the same on the containers and/or tags attached to the goods, and requests that the same be registered in the United States Patent Office on the Principal Register in accordance with the act of July 5, 1946.

The trade-mark was first used in 1894 and was first used in commerce which may lawfully be regulated by the Congress, viz. commerce between the United States and Switzerland in the same year.

Applicant owns the following U. S. registration: No. 25,036.

The applicant hereby designates Chauncey P. Carter, of 4400 Klingle Street, Washington 16, D. C., as applicant's representative in the United States on whom notices or process in proceedings affecting the mark may be served.

OMEGA LOUIS BRANDT & FRÈRE, S. A.,

By A. VALLAT,
Commercial Manager.

COMB. AFF. SEC. 8 & 15

DEC 23 1957



United States Patent and Trademark Office

[Home](#) | [Site Index](#) | [Search](#) | [Guides](#) | [Contacts](#) | [eBusiness](#) | [eBiz alerts](#) | [News](#) | [Help](#)



Assignments on the Web > [Trademark Query](#)

Trademark Assignment Abstract of Title

Total Assignments: 1
Serial #: [71622275](#) **Filing Dt:** 12/08/1951 **Reg #:** [566370](#) **Reg. Dt:** 11/04/1952
Registrant: OMEGA LOUIS BRANDT & FRERE, S.A.
Mark: OMEGA

Assignment: 1

Reel / Frame: [0582/0575](#) **Recorded:** 11/13/1987 **Pages:** 3
Conveyance: CHANGE OF NAME 19820624
Assignor: [OMEGA LOUIS BRANDT & FRERE S.A.](#) **Exec Dt:** 04/15/1987
Assignee: [OMEGA SA \(OMEGA AG\) \(OMEGA LTD.\)](#) **Entity Type:** UNKNOWN
 Citizenship: NONE
 Entity Type: UNKNOWN
 Citizenship: NONE

Correspondent: SHENIER & O'CONNOR
122 EAST 42ND STREET
NEW YORK, NY 10168

Search Results as of: 11/15/2018 12:09 PM
If you have any comments or questions concerning the data displayed, contact PRD / Assignments at 571-272-3350. v.2.6
Web interface last modified: August 25, 2017 v.2.6

Int. Cl.: 14

Prior U.S. Cl.: 27

United States Patent and Trademark Office
10 Year Renewal

Reg. No. 578,041

Registered July 28, 1953

Renewal Term Begins July 28, 1993

**TRADEMARK
PRINCIPAL REGISTER**



OMEGA SA (OMEGA AG) (OMEGA LTD.) (SWITZERLAND CORPORATION) BIENNE, SWITZERLAND, BY CHANGE OF NAME FROM OMEGA LOUIS BRANDT & FRERE, S.A. (SWITZERLAND CORPORATION) BIENNE, SWITZERLAND

OWNER OF U.S. REG. NOS. 25,036 AND 566,370.

FOR: WATCHES (INCLUDING POCKET WATCHES, WRIST WATCHES

WITH OR WITHOUT STRAPS, BANDS OR BRACELETS, PENDANT WATCHES, CALENDAR WATCHES, AND STOP-WATCHES) EITHER STEM-WIND OR AUTOMATIC; CLOCKS; CHRONOMETERS, CHRONOGRAPHS, AND PARTS FOR ALL OF THE FOREGOING, IN CLASS 27 (INT. CL. 14).

FIRST USE 0-0-1894; IN COMMERCE 0-0-1894.

SER. NO. 71-637,074, FILED 10-23-1952.

*In testimony whereof I have hereunto set my hand
and caused the seal of The Patent and Trademark
Office to be affixed on June 21, 1994.*

COMMISSIONER OF PATENTS AND TRADEMARKS

Registered July 28, 1953

Registration No. 578,041

PRINCIPAL REGISTER
Trade-Mark

UNITED STATES PATENT OFFICE

Omega Louis Brandt & Frère, S. A.,
Bienne, Switzerland

Act of 1946

Application October 23, 1952, Serial No. 637,074



STATEMENT

Omega Louis Brandt & Frère, S. A., a Swiss corporation, located and doing business at Bienne, Switzerland, has adopted and is using the trade-mark shown in the accompanying drawing, for WATCHES (INCLUDING POCKET WATCHES, WRIST WATCHES WITH OR WITHOUT STRAPS, BANDS OR BRACELETS, PENDANT WATCHES, CALENDAR WATCHES, AND STOPWATCHES) EITHER STEM-WIND OR AUTOMATIC; CLOCKS; CHRONOMETERS, CHRONOGRAPHS, AND PARTS FOR ALL OF THE FOREGOING, in Class 27, Horological instruments, and presents herewith five specimens showing the trade-mark as actually used in connection with such goods, the trade-mark being applied to the goods; to tags or labels fastened to the goods; or to the containers, and requests that the same be registered in the United States

Patent Office on the Principal Register in accordance with the act of July 5, 1946.

The trade-mark was first used in 1894, and was first used in commerce which may lawfully be regulated by Congress, viz., commerce between the United States and Switzerland in the same year. Such first usage was on watches.

Applicant owns the following U. S. registrations: Nos. 25,036 and 566,370.

The applicant hereby designates Chauncey P. Carter, of 4400 Klinge Street, Washington 16, D. C., as applicant's representative in the United States on whom notices or process in proceedings affecting the mark may be served.

OMEGA LOUIS BRANDT &

FRÈRE, S. A.,

By ADOLPHE VALLAT,

Commercial Manager.

COMB. AFF. SEC. 8 & 15

FEB 2 - 1959



United States Patent and Trademark Office

[Home](#) | [Site Index](#) | [Search](#) | [Guides](#) | [Contacts](#) | [eBusiness](#) | [eBiz alerts](#) | [News](#) | [Help](#)



Assignments on the Web > [Trademark Query](#)

Trademark Assignment Abstract of Title

Total Assignments: 1
Serial #: [71637074](#) **Filing Dt:** 10/23/1952 **Reg #:** [578041](#) **Reg. Dt:** 07/28/1953
Registrant: OMEGA LOUIS BRANDT & FRERE, S.A.
Mark: OMEGA

Assignment: 1

Reel/Frame: 1135/0407	Recorded: 04/12/1994	Pages: 5
Conveyance: CHANGE OF NAME EFFECTIVE 6-24-82.		
Assignor: OMEGA LOUIS BRANDT & FRERE S.A.	Exec Dt: 04/15/1987	
	Entity Type: CORPORATION	
	Citizenship: SWITZERLAND	
Assignee: OMEGA SA (OMEGA AG) (OMEGA LTD.) BIENNE, SWITZERLAND	Entity Type: CORPORATION	
	Citizenship: SWITZERLAND	
Correspondent: JESS M. COLLEN MCGLEW AND TUTTLE, P.C. SCARBOROUGH STATION SCARBOROUGH, NY 10510-0827		

Search Results as of: 11/15/2018 12:10 PM
If you have any comments or questions concerning the data displayed, contact PRD / Assignments at 571-272-3350. v.2.6
Web interface last modified: August 25, 2017 v.2.6

Int. Cl.: 14

Prior U.S. Cl.: 27

Reg. No. 672,487

United States Patent and Trademark Office

Registered Jan. 13, 1959

10 Year Renewal

Renewal Term Begins Jan. 13, 1999

**TRADEMARK
PRINCIPAL REGISTER**

SPEEDMASTER

OMEGA SA (OMEGA AG) (OMEGA LTD.) (SWITZERLAND CORPORATION)

96 RUE JAKOB STAMPFELI
BIENNE, SWITZERLAND, BY ASSIGNMENT AND CHANGE OF NAME FROM NORMAN M. MORRIS CORPORATION (NEW YORK CORPORATION) NEW YORK, NY

FOR: WATCHES AND CLOCKS, IN CLASS 27 (INT. CL. 14).

FIRST USE 12-1-1957; IN COMMERCE 12-1-1957.

SER. NO. 72-047,594, FILED 3-12-1958.

*In testimony whereof I have hereunto set my hand
and caused the seal of The Patent and Trademark
Office to be affixed on Feb. 16, 1999.*

COMMISSIONER OF PATENTS AND TRADEMARKS

United States Patent Office

672,487
Registered Jan. 13, 1959

PRINCIPAL REGISTER Trademark

Ser. No. 47,594, filed Mar. 12, 1958

SPEEDMASTER

Norman M. Morris Corporation (New York corporation)
655 Madison Ave.
New York 21, N. Y.

For: WATCHES AND CLOCKS, in CLASS 27.
First use Dec. 1, 1957; in commerce Dec. 1, 1957.

COMB. AFF. SEC. 8 & 15

FEB 24 1964



United States Patent and Trademark Office

[Home](#) | [Site Index](#) | [Search](#) | [Guides](#) | [Contacts](#) | [eBusiness](#) | [eBiz alerts](#) | [News](#) | [Help](#)



[Assignments on the Web](#) > [Trademark Query](#)

Trademark Assignment Abstract of Title

Total Assignments: 2

Serial #: [72047594](#)

Filing Dt: 03/12/1958

Reg #: [672487](#)

Reg. Dt: 01/13/1959

Registrant: NORMAN M. MORRIS CORPORATION

Mark: SPEEDMASTER

Assignment: 1

Reel/Frame: [1133/0405](#)

Recorded: 04/13/1994

Pages: 5

Conveyance: CHANGE OF NAME (SEE RECORD FOR DETAILS)

Assignor: [OMEGA LOUIS BRANDT & FRERE S.A.](#)

Exec Dt: 07/06/1982

Entity Type: CORPORATION

Citizenship: SWITZERLAND

Assignee: [OMEGA SA \(OMEGA AG\) \(OMEGA LTD.\)](#)
BIENNE, SWITZERLAND

Entity Type: CORPORATION

Citizenship: SWITZERLAND

Correspondent: JESS M. COLLEN
MCGLEW & TUTTLE, P.C.
SCARBOROUGH STATION
SCARBOROUGH, NY 10510-0827

Assignment: 2

Reel/Frame: [0360/0847](#)

Recorded: 12/26/1979

Pages: 1

Conveyance: ASSIGNS THE ENTIRE INTEREST AND THE GOOD WILL AS OF MARCH 1, 1977

Assignor: [NORMAN M. MORRIS CORPORATION](#)

Exec Dt: 00/00/0000

Entity Type: CORPORATION

Citizenship: NEW YORK

Assignee: [OMEGA LOUIS BRANDT & FRERE S.A.](#)
96 RUE STAMPFLI
BIEENE, SWITZERLAND

Entity Type: CORPORATION

Citizenship: SWITZERLAND

Correspondent: MASON, FENWICK, ET AL.
1730 RHODE ISLAND AVE. N. W.
1730 RHODE ISLAND AVE. N. W.
WASHINGTON, DC 20036

Search Results as of: 11/15/2018 12:10 PM
If you have any comments or questions concerning the data displayed, contact PRD / Assignments at 571-272-3350. v.2.6
Web interface last modified: August 25, 2017 v.2.6

[HOME](#) | [INDEX](#) | [SEARCH](#) | [eBUSINESS](#) | [CONTACT US](#) | [PRIVACY STATEMENT](#)

United States Patent Office

734,891
Registered July 24, 1962

PRINCIPAL REGISTER Trademark

Ser. No. 127,631, filed Sept. 11, 1961



Omega Louis Brandt & Frere, S.A. (Swiss company)
Bienne, Switzerland

For: TIMEPIECES AND PARTS THEREOF, in
CLASS 27.

First use 1894; in commerce 1894.

The symbol shown on the drawing is the last letter of
the Greek alphabet.

Owner of U.S. Reg. Nos. 25,036, 708,731, and others.



United States Patent and Trademark Office
[Home](#) | [Site Index](#) | [Search](#) | [Guides](#) | [Contacts](#) | [eBusiness](#) | [eBiz alerts](#) | [News](#) | [Help](#)



Assignments on the Web > [Trademark Query](#)

Trademark Assignment Abstract of Title

Total Assignments: 1
Serial #: [72127631](#) **Filing Dt:** 09/11/1961 **Reg #:** [734891](#) **Reg. Dt:** 07/24/1962
Registrant: Omega Louis Brandt & Frere, S.A.
Mark:

Assignment: 1
Reel/Frame: [0432/0299](#) **Recorded:** 01/07/1983 **Pages:** 3
Conveyance: CHANGE OF NAME 19820624
Assignor: [OMEGA LOUIS BRANDT & FRERE, S.A.](#) **Exec Dt:** 10/26/1982
 Entity Type: UNKNOWN
 Citizenship: NONE
Assignee: [OMEGA SA \(OMEGA AG\) \(OMEGA LTD.\)](#) **Entity Type:** UNKNOWN
 Citizenship: NONE

Correspondent: MASON, FENWICK, ET AL.
310 OFC BLDG.
310 OFC BLDG.
1730 R. I. AVE., N. W.
WASHINGTON, DC 20036

If you have any comments or questions concerning the data displayed, contact PRD / Assignments at 571-272-3350. v.2.6
Web interface last modified: August 25, 2017 v.2.6

Search Results as of: 10/24/2019 02:38 PM

| [HOME](#) | [INDEX](#) | [SEARCH](#) | [eBUSINESS](#) | [CONTACT US](#) | [PRIVACY STATEMENT](#)

Int. Cl.: 14

Prior U.S. Cl.: 27

United States Patent and Trademark Office

Reg. No. 1,309,929

Registered Dec. 18, 1984

TRADEMARK
Principal Register

DE VILLE

Omega S.A. (Switzerland corporation)
96 rue Staempfli
Bienne, Switzerland 2500

For: WATCHES, WRIST WATCHES, PORT-
FOLIO WATCHES, PENDANT WATCHES,
AND MINIATURE CLOCKS; AND PARTS
THEREOF, in CLASS 14 (U.S. Cl. 27).

Owner of Switzerland Reg. No. 196,247, dated
Dec. 31, 1962, renewed as Reg. No. 322,384, dated
Oct. 1, 1982, expires Oct. 1, 2002.

The English translation of "De Ville" is "of the
City".

Ser. No. 418,969, filed Mar. 28, 1983.

JANIS MALTZ, Examiner

Int. Cl.: 14

Prior U.S. Cls.: 2, 27, 28 and 50

Reg. No. 3,085,659

United States Patent and Trademark Office

Registered Apr. 25, 2006

**TRADEMARK
PRINCIPAL REGISTER**

PLANET OCEAN

OMEGA SA (OMEGA AG) (OMEGA LTD.) (SWIT-
ZERLAND JOINT STOCK COMPANY)
96, RUE JAKOB-STÄMPFLI
CH-2502 BIENNE
SWITZERLAND

OWNER OF INTERNATIONAL REGISTRATION
0705904 DATED 1-14-1999, EXPIRES 1-14-2009.

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

SER. NO. 79-009,839, FILED 9-17-2004.

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

VERNA BETH RIRIE, EXAMINING ATTORNEY

Int. Cl.: 14

Prior U.S. Cls.: 2, 27, 28, and 50

Reg. No. 3,640,080

United States Patent and Trademark Office

Registered June 16, 2009

**TRADEMARK
PRINCIPAL REGISTER**

SEAMASTER

OMEGA SA (OMEGA AG) (OMEGA LTD.) (SWITZERLAND CORPORATION)
JAKOB-STAMPFLI-STRASSE 96
2502 BIEL/BIENNE, SWITZERLAND

PRIORITY CLAIMED UNDER SEC. 44(D) ON
SWITZERLAND APPLICATION NO. 01106/2006,
FILED 5-22-2006, REG. NO. 547867, DATED 11-7-
2006, EXPIRES 5-22-2016.

FOR: JEWELRY, PRECIOUS STONES; HOROLOGICAL AND CHRONOMETRICAL INSTRUMENTS, IN CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).

OWNER OF U.S. REG. NOS. 556,602, 3,074,168, AND OTHERS.

FIRST USE 3-25-1949; IN COMMERCE 3-25-1949.

SN 77-048,887, FILED 11-21-2006.

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

DANIEL CAPSHAW, EXAMINING ATTORNEY



United States Patent and Trademark Office
[Home](#) | [Site Index](#) | [Search](#) | [FAQ](#) | [Glossary](#) | [Guides](#) | [Contacts](#) | [eBusiness](#) | [eBiz alerts](#) | [News](#) | [Help](#)

Trademarks > Trademark Electronic Search System (TESS)

TESS was last updated on Tue Nov 26 03:51:02 EST 2019

[TESS HOME](#)
[NEW USER](#)
[STRUCTURED](#)
[FREE FORM](#)
[BROWSE DICT](#)
[SEARCH OG](#)
[BOTTOM](#)
[HELP](#)
[PREV LIST](#)
[CURR LIST](#)
[NEXT LIST](#)
[FIRST DOC](#)

[PREV DOC](#)
[NEXT DOC](#)
[LAST DOC](#)

Logout

Please logout when you are done to release system resources allocated for you.

Start

List At:

OR

Jump

to record:

Record 4 out of 4

[TSDR](#)
[ASSIGN Status](#)
[TTAB Status](#)

(Use the "Back" button of the Internet Browser to return to TESS)

SEAMASTER

Word Mark	SEAMASTER
Goods and Services	IC 014. US 002 027 028 050. G & S: ((Jewelry,)) [precious stones;] horological and chronometrical instruments. FIRST USE: 19490325. FIRST USE IN COMMERCE: 19490325
Standard Characters Claimed	
Mark Drawing Code	(4) STANDARD CHARACTER MARK
Serial Number	77048887
Filing Date	November 21, 2006
Current Basis	1A;44E
Original Filing Basis	1B;44D;44E
Published for Opposition	July 31, 2007
Registration Number	3640080
Registration Date	June 16, 2009
Owner	(REGISTRANT) Omega SA (Omega AG) (Omega Ltd.) CORPORATION SWITZERLAND Jakob-Stampfli-Strasse 96 2502 Biel/Bienne SWITZERLAND
Attorney of Record	Lawrence E. Abelman
Priority Date	May 22, 2006
Prior Registrations	0556602;3074168;AND OTHERS
Type of Mark	TRADEMARK
Register	PRINCIPAL
Affidavit Text	SECT 15. SECT 8 (6-YR). SECTION 8(10-YR) 20190723.
Renewal	1ST RENEWAL 20190723
Live/Dead Indicator	LIVE

[TESS HOME](#)
[NEW USER](#)
[STRUCTURED](#)
[FREE FORM](#)
[BROWSE DICT](#)
[SEARCH OG](#)
[TOP](#)
[HELP](#)
[PREV LIST](#)
[CURR LIST](#)
[NEXT LIST](#)
[FIRST DOC](#)

[PREV DOC](#)
[NEXT DOC](#)
[LAST DOC](#)

United States of America
United States Patent and Trademark Office

AQUA TERRA

Reg. No. 4,299,644

Registered Mar. 12, 2013

Int. Cl.: 14

TRADEMARK

PRINCIPAL REGISTER

OMEGA SA(OMEGA AG)(OMEGA LTD.) (SWITZERLAND JOINT STOCK COMPANY)
96 JAKOB-STAMPFLI-STRASSE
2502 BIEL/BIENNE, SWITZERLAND

FOR: WATCHES, WATCH STRAPS, WATCH BRACELETS AND PARTS THEREOF,
CHRONOMETERS, CHRONOGRAPHS FOR USE AS WATCHES, WATCHES MADE OF
PRECIOUS METALS, WATCHES PARTLY OR ENTIRELY SET WITH PRECIOUS STONES,
IN CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).

FIRST USE 6-21-2002; IN COMMERCE 7-18-2002.

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

OWNER OF SWITZERLAND REG. NO. 502863, DATED 6-11-2002, EXPIRES 6-11-2022.

SER. NO. 77-273,706, FILED 9-7-2007.

STEVEN JACKSON, EXAMINING ATTORNEY



Steven Jackson

Acting Director of the United States Patent and Trademark Office

**REQUIREMENTS TO MAINTAIN YOUR FEDERAL
TRADEMARK REGISTRATION**

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

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

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

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

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

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

Grace Period Filings*

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

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

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

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

United States of America
United States Patent and Trademark Office

CO-AXIAL

Reg. No. 4,442,192

Registered Dec. 3, 2013

Int. Cl.: 14

TRADEMARK

PRINCIPAL REGISTER

OMEGA SA (OMEGA AG) (OMEGA LTD.) (SWITZERLAND CORPORATION)
JAKOB-STÄMPFLI-STRASSE 96
2502 BIEL/BIENNE, SWITZERLAND

FOR: HOROLOGICAL AND CHRONOMETRIC INSTRUMENTS, IN CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).

FIRST USE 6-28-1999; IN COMMERCE 7-1-1999.

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

SEC. 2(F).

SER. NO. 85-567,398, FILED 3-12-2012.

DEZMONA MIZELLE, EXAMINING ATTORNEY



Deborah S. Cohn

Commissioner for Trademarks of the
United States Patent and Trademark Office

United States of America

United States Patent and Trademark Office

DARK SIDE OF THE MOON

Reg. No. 4,735,993

Registered May 12, 2015

Int. Cl.: 14

TRADEMARK

PRINCIPAL REGISTER

OMEGA SA (OMEGA AG) (OMEGA LTD.) (SWITZERLAND CORPORATION)
JAKOB-STÄMPFLI-STRASSE 96
2502 BIEL/BIENNE, SWITZERLAND

FOR: HOROLOGICAL AND CHRONOMETRIC INSTRUMENTS, IN CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).

FIRST USE 10-10-2013; IN COMMERCE 10-17-2013.

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

OWNER OF SWITZERLAND REG. NO. 639818, DATED 2-12-2013, EXPIRES 1-25-2023.

SN 86-040,421, FILED 8-16-2013.

ELISSA GARBER KON, EXAMINING ATTORNEY



Michelle K. Lee

Director of the United States
Patent and Trademark Office

United States of America

United States Patent and Trademark Office



Reg. No. 5,094,915

Registered Dec. 06, 2016

Int. Cl.: 14

Trademark

Principal Register

Omega SA (Omega AG) (Omega Ltd.) (SWITZERLAND CORPORATION)
Jakob-Stämpfli-Strasse 96
Biel/Bienne SWITZERLAND 2502

CLASS 14: Horological and chronometric instruments and parts for the aforesaid goods; accessories namely, watch chains, presentation cases for watches and cases for watches

FIRST USE 3-10-1894; IN COMMERCE 3-10-1894

OWNER OF SWITZERLAND REG. NO. 665364, DATED 10-24-2014, RENEWED AS REG. NO. 665364, EXPIRES 10-10-2024

The mark consists of the letter of the Greek alphabet OMEGA above the word "OMEGA".

SER. NO. 86-978,393, FILED 04-24-2015

JENNIFER LYNN O'BRIEN, EXAMINING ATTORNEY



Michelle K. Lee

Director of the United States
Patent and Trademark Office

United States of America

United States Patent and Trademark Office

MOONWATCH

Reg. No. 5,211,480

Registered May 30, 2017

Int. Cl.: 14

Trademark

Principal Register

Omega SA (Omega AG) (Omega Ltd.) (SWITZERLAND CORPORATION)
Jakob-Stämpfli-Strasse 96
2502 Biel/Bienne SWITZERLAND

CLASS 14: Horological and chronometric instruments

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

OWNER OF SWITZERLAND REG. NO. 634085, DATED 09-14-2012, RENEWED AS REG. NO. 634085, EXPIRES 09-07-2022

SER. NO. 86-050,542, FILED 08-28-2013
ELISSA GARBER KON, EXAMINING ATTORNEY



Michelle K. Lee

Director of the United States
Patent and Trademark Office

United States of America

United States Patent and Trademark Office

CO-AXIAL MASTER CHRONOMETER

Reg. No. 5,266,563

Registered Aug. 15, 2017

Int. Cl.: 14

Trademark

Principal Register

Omega SA (Omega AG) (Omega Ltd.) (SWITZERLAND CORPORATION)
Jakob-Stämpfli-Strasse 96
2502 Biel/Bienne SWITZERLAND

CLASS 14: horological and chronometric instruments

FIRST USE 10-29-2015; IN COMMERCE 11-12-2015

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

PRIORITY CLAIMED UNDER SEC. 44(D) ON SWITZERLAND APPLICATION NO. 53181/2015, FILED 03-18-2015, REG. NO. 675216, DATED 07-06-2015, EXPIRES 03-18-2025

OWNER OF U.S. REG. NO. 4442192

No claim is made to the exclusive right to use the following apart from the mark as shown:
"CHRONOMETER"

SEC. 2(F) as to "CO-AXIAL"

SER. NO. 86-742,813, FILED 08-31-2015
YAT SYE I LEE, EXAMINING ATTORNEY



Joseph Matal

Performing the Functions and Duties of the
Under Secretary of Commerce for
Intellectual Property and Director of the
United States Patent and Trademark Office