

## Registration Cancelled for *De Minimis* Use

Published in *Managing Intellectual Property*

December 2015

In this article, Intellectual Property national co-chair Karen Artz Ash and partner Bret Danow examine the Trademark Trial and Appeal Board (TTAB)'s non-precedential, but potentially instructive, opinion in *Adidas AG v. Christian Fellowship Church* in which it sustained a petition for cancellation on the grounds of non-use. The case analyzed whether sales of only a small number of goods by Christian Fellowship Church constituted "use in commerce" under the Trademark Act. The decision may serve as an indicator as to how the TTAB will decide future cases where a registrant has only sold a relatively small amount of goods and where those sales are local.

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