

Brent H. Blakely (SBN 157292)
bblakely@blakelylawgroup.com
Jamie Fountain (SBN 316567)
jfountain@blakelylawgroup.com
BLAKELY LAW GROUP
1334 Parkview Avenue, Suite 280
Manhattan Beach, California 90266
Telephone: (310) 546-7400
Facsimile: (310) 546-7401
Attorneys for Plaintiff
Deckers Outdoor Corporation

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

DECKERS OUTDOOR
CORPORATION, a Delaware
Corporation,

Plaintiff,

v.

LAST BRAND, INC. dba QUINCE, a
Delaware Corporation; and DOES 1-10,
inclusive,

Defendant.

CASE NO.:

**COMPLAINT FOR DAMAGES AND
EQUITABLE RELIEF:**

- 1. TRADE DRESS INFRINGEMENT
UNDER THE LANHAM ACT**
 - 2. TRADE DRESS INFRINGEMENT
UNDER CALIFORNIA COMMON
LAW**
 - 3. UNFAIR COMPETITION IN
VIOLATION OF CAL. BUS. &
PROF. CODE § 17200 *et seq.***
 - 4. UNFAIR COMPETITION UNDER
CALIFORNIA COMMON LAW**
 - 5. PATENT INFRINGEMENT**
- JURY TRIAL DEMANDED**

1 Plaintiff Deckers Outdoor Corporation (“Deckers” or “Plaintiff”) for its
2 Complaint against Defendant Last Brand, Inc. dba Quince (“Quince”) and DOES 1-10
3 (collectively “Defendants”) alleges as follows:

4 **JURISDICTION AND VENUE**

5 1. This action arises out of Defendant’s complicit and unlawful acts
6 constituting trade dress infringement and unfair competition in violation of the Lanham
7 Trademark Act of 1946, 15 U.S.C. § 1051, *et seq.* (the “Lanham Act”), patent
8 infringement arising under the patent laws of the United States, 35 U.S.C. § 1, *et seq.*
9 and violations of statutory and common law of the state of California.

10 2. This Court has subject matter jurisdiction over the federal claims asserted
11 in this action under 28 U.S.C. §§ 1331 and 1338(a) and supplemental jurisdiction over
12 Plaintiff’s state law claims pursuant to 28 U.S.C. § 1367(a) because they are so related
13 to the federal claims that they form part of the same case or controversy.

14 3. This Court has personal jurisdiction over Defendant because Defendant
15 conducts continuous and systematic business in this district, placed infringing products
16 in the stream of commerce directed to residents of this district, derived commercial
17 benefits from the sale of infringing products and caused injuries to Plaintiff within the
18 Central District of California.

19 4. Venue is proper under 28 U.S.C. §§ 1391(b)-(c) because a substantial part
20 of the events or omissions giving rise to the claims alleged occurred in this judicial
21 district and Plaintiff is located and has been injured in this judicial district, and 28
22 U.S.C. § 1400(b) because Defendant committed acts of infringement in this judicial
23 district.

24 **THE PARTIES**

25 5. Plaintiff Deckers Outdoor Corporation is a corporation organized and
26 existing under the laws of the state of Delaware with an office and principal place of
27 business located in Goleta, California. Deckers designs and markets footwear products
28 under a number of well-known brands, including UGG® products covered by the

1 intellectual property asserted in this Complaint.

2 6. Upon information and belief, Defendant Last Brand, Inc. dba Quince is a
3 corporation organized and existing under the laws of the state of Delaware and a
4 registered foreign entity doing business in the state of California (4254361) with an
5 office and principal place of business located at 735 Market Street, San Francisco,
6 California 94103.

7 7. Deckers is informed and believes that, together with Quince, other
8 individuals and entities currently named as DOES 1-10 may also be responsible in one
9 manner or another for the wrongs alleged herein, in that at all relevant times, each one
10 (including Quince) was the agent and servant of the others and acting within the course
11 and scope of said agency and employment. These other individuals and entities are sued
12 under fictitious names DOES 1-10 because their true names and capacities are currently
13 unknown to Deckers. Deckers will seek leave to amend this Complaint when the true
14 names and capacities of DOES 1-10 are ascertained.

15 **ALLEGATIONS COMMON TO ALL CAUSES OF ACTION**

16 **A. Deckers' UGG® Brand**

17 8. Deckers has been engaged in the design, distribution, marketing, offering
18 for sale, and sale of footwear since 1975. Deckers owns and markets its footwear
19 products under several distinctive trademarked brands, including UGG®, Teva®,
20 HOKA®, Koolaburra®, and Sanuk®.

21 9. Deckers' UGG® brand is one of the most well-recognized premium
22 comfort-leisure shoe brands in the United States. Since 1979, when the UGG® brand
23 was founded, the popularity of UGG® footwear has steadily grown in the U.S. and
24 around the world. UGG® footwear has been and remains highly coveted today by
25 consumers as one of the most popular and recognizable symbols of luxury and style.

26 10. For example, in 2000, UGG® boots were featured on Oprah's Favorite
27 Things® where Oprah emphatically declared on national television how much she
28 "LOOOOOVES her UGG boots." Since then, the popularity of UGG® footwear has

grown exponentially, with celebrities such as Hailey Bieber, Kendall Jenner, Emily Ratajowski, and Megan Fox among a myriad of others regularly seen wearing UGG® footwear, including the UGG® Classic Ultra Mini.

11. The world-wide recognition as a “premium” brand and the overwhelming popularity of the UGG® brand is due to Deckers’ continuous commitment to quality and excellence. Today, Deckers’ footwear products under the UGG® brand are widely available and sold to consumers in every state, including California, through UGG® Stores, authorized retailers on the internet and brick-and-mortar stores, as well as on the internet at www.ugg.com.

B. Defendant’s Infringing Activities

12. This lawsuit arises from Defendant’s design, manufacture, importation, distribution, advertisement, marketing, offering for sale, and sale in the U.S. of certain footwear products that infringe upon Deckers’ “Classic Ultra Mini Trade Dress”, and U.S. Patent D927,161 (the “’161 Patent”) (the “Accused Product”).

13. Upon information and belief, Defendant Quince is engaged in the retail sale of a wide range of apparel including under its Quince® brand through its website (www.onequince.com) that is accessible to customers nationwide, including to those within this judicial district.

14. Upon information and belief, Quince is a competitor of Deckers and introduced the Accused Product into the stream of commerce in an effort to exploit Deckers’ goodwill and the reputation of the UGG® Classic Ultra Mini and ’161 Patent.

15. Deckers has not granted Defendant a license to practice nor given Defendant any form of permission to use Deckers’ trademarks, trade dresses, or patents, including the Classic Ultra Mini Trade Dress and ’161 Patent.

16. Upon information and belief, Defendant imported into the U.S., advertised, marketed, offered for sale, and/or sold at least the Accused Product identified by name as Quince® brand “Australian Shearling Mini Boots” through its website (onequince.com) to consumers nationwide, including consumers located within this

judicial district. Exemplars of the Accused Product below:



**Exemplars of Defendant's
Quince® "Australian Shearing Mini Boots"**

17. Upon information and belief, Defendant may have sold additional products that infringe upon Deckers' design patents and trade dresses. Deckers will seek leave to amend as additional information becomes available through discovery.

18. Upon information and belief, Defendant has acted in bad faith and Defendant's unlawful acts have misled and confused, and were intended to cause confusion, or to cause mistake, or to deceive consumers as to the affiliation, connection, or association of the Accused Product with Deckers, and/or the origin, sponsorship, or approval of the Accused Product by Deckers.

FIRST CLAIM FOR RELIEF

(Trade Dress Infringement - 15 U.S.C. § 1125(a))

19. Deckers incorporates by reference each and every one of the preceding paragraphs as though fully set forth herein.

20. In 2020, Deckers introduced the UGG® Classic Ultra Mini, marketed and featuring the design elements protected under the "Classic Ultra Mini Trade Dress." The Classic Ultra Mini Trade Dress is unique and inherently distinctive, and comprised of the following non-functional elements:

- a. An ankle-high boot;
- b. Classic suede boot styling;

- c. An exaggerated, raised and exposed circular stitch pattern;
- d. Exposed tufting;
- e. A raised and rounded vamp;
- f. A suede heel overlay on the boots exterior;
- g. Fabric binding along the top of the boot and along the sole;
- h. A thick, flat sole; and
- i. A top line that is higher in the front and lower in the back.

21. The Classic Ultra Mini Trade Dress, which is a composite of the above-referenced features, is non-functional in its entirety, visually distinctive, and unique in the footwear industry; examples of its distinctive appearance as a whole are shown in the photographs below:



22. The design of the Classic Ultra Mini Trade Dress is neither essential to its use or purpose, nor does it affect the cost or quality of the shoe. There are numerous other designs available that are equally feasible and efficient, none of which necessitate copying or imitating the Classic Ultra Mini Trade Dress. The combination of features comprising the Classic Ultra Mini Trade Dress provides no cost advantages to the manufacturer or utilitarian advantages to the consumer. These features, in combination, serve only to render the UGG® Classic Ultra Mini, the embodiment of the Classic Ultra Mini Trade Dress, as a distinct product originating solely from Deckers.

23. The UGG® Classic Ultra Mini, the embodiment of the Classic Ultra Mini Trade Dress, is one of the most well-recognized and commercially successful styles of UGG® brand of footwear products, having been featured in many of Deckers' advertising and promotional materials as well as in various trade publications. The UGG® Classic Ultra Mini has received a large volume of unsolicited media attention, for example, through various celebrities seen wearing the UGG® Classic Ultra Mini and graced the pages of many popular magazines nationwide and internationally.

24. Deckers has spent substantial time, effort, and money in designing, developing, advertising, promoting, and marketing the UGG® brand and its line of footwear embodying the Classic Ultra Mini Trade Dress. Deckers spends millions of dollars annually on advertising of UGG® products, including footwear embodying the Classic Ultra Mini Trade Dress.

25. Due to its long use, extensive sales, and significant advertising and promotional activities, Deckers' Classic Ultra Mini Trade Dress has achieved widespread acceptance and recognition among the consuming public and trade throughout the United States. Indeed, Deckers has sold millions of dollars' worth of UGG® Classic Ultra Mini boots, the embodiment of the Classic Ultra Mini Trade Dress. Accordingly, the Classic Ultra Mini Trade Dress has achieved a high degree of consumer recognition and secondary meaning, which serves to identify Deckers as the exclusive source of footwear featuring said trade dress.

26. Upon information and belief, Defendant are competitors of Deckers and Defendant introduced Accused Product into the stream of commerce in an effort to exploit Deckers' goodwill and the reputation of the UGG® Classic Ultra Mini.

27. The Accused Product manufactured, imported, distributed, advertised, offered for sale, and/or sold by Defendant bear confusingly similar reproductions of the Classic Ultra Mini Trade Dress, such as to cause a likelihood of confusion as to the source, sponsorship or approval by Deckers of the Accused Product.

28. Defendant's use of the Classic Ultra Mini Trade Dress is without Deckers'

1 permission or authorization, and in total disregard of Deckers' rights to control its
2 intellectual property. There are numerous other shoe designs in the footwear industry,
3 none of which necessitate copying or imitating the Classic Ultra Mini Trade Dress.

4 29. Defendant's use of the Classic Ultra Mini Trade Dress is likely to lead to
5 and result in confusion, mistake, or deception, and is likely to cause the public to believe
6 that Accused Product are produced, sponsored, authorized, or licensed by or are
7 otherwise connected or affiliated with Deckers.

8 30. As a direct and proximate result of the foregoing acts, Deckers has suffered
9 and will continue to suffer significant injuries in an amount to be determined at trial.
10 Deckers is entitled to recover all damages, including attorneys' fees, that it has sustained
11 and will sustain, and all gains, profits and advantages obtained by Defendant as a result
12 of its infringing acts.

13 31. Furthermore, unless Defendant's unlawful acts are enjoined by this Court,
14 there is no adequate remedy at law that can fully compensate Deckers for the harm
15 caused by Defendant's infringement, which is ongoing. Accordingly, Deckers is
16 entitled to injunctive relief prohibiting Defendant from continuing to infringe the
17 Classic Ultra Mini Trade Dress, or any designs confusingly similar thereto.

18 **SECOND CLAIM FOR RELIEF**

19 **(Trade Dress Infringement– California Common Law)**

20 32. Deckers incorporates by reference each and every one of the preceding
21 paragraphs as though fully set forth herein.

22 33. Defendant's infringement of the Classic Ultra Mini Trade Dress also
23 constitutes trade dress infringement under common law of the state of California.

24 34. The Accused Product manufactured, imported, distributed, advertised,
25 offered for sale, and/or sold by Defendant bears confusingly similar reproductions of
26 the Classic Ultra Mini Trade Dress such as to cause a likelihood of confusion as to the
27 source, sponsorship or approval by Deckers of the Accused Product.

28 35. Defendant's unauthorized use of the Classic Ultra Mini Trade Dress has

1 caused and is likely to cause confusion as to the source of Accused Product among
2 consumers.

3 36. As a direct and proximate result of the foregoing acts, Deckers has suffered
4 and will continue to suffer significant injuries in an amount to be determined at trial.
5 Deckers is entitled to recover all damages, including attorneys' fees, that it has sustained
6 on account of Defendant's infringement, and all gains, profits and advantages obtained
7 by Defendant as a result of its unlawful acts.

8 37. Defendant's unlawful acts were willful, deliberate, and intended to cause
9 confusion among the public, taken in reckless disregard of Deckers' rights. As such, an
10 award of exemplary and punitive damages is necessary in an amount sufficient to deter
11 similar misconduct in the future.

12 38. Furthermore, unless Defendant's unlawful acts are enjoined by this Court,
13 there is no adequate remedy at law that can fully compensate Deckers for the damages
14 caused by Defendant's infringement, which is ongoing. Accordingly, Deckers is
15 entitled to injunctive relief prohibiting Defendant from continuing to infringe the
16 Classic Ultra Mini Trade Dress, or any designs confusingly similar thereto.

17 **THIRD CLAIM FOR RELIEF**

18 **(Unfair Competition in Violation of Cal. Bus. & Prof. Code, § 17200 *et. seq.*)**

19 39. Deckers incorporates by reference each and every one of the preceding
20 paragraphs as though fully set forth herein.

21 40. Defendant's misappropriation and unauthorized use of the Classic Ultra
22 Mini Trade Dress to promote the Accused Product is likely to confuse or mislead
23 consumers into believing that such products are authorized, licensed, affiliated,
24 sponsored, and/or approved by Deckers, constituting deceptive, unfair, and fraudulent
25 business practices and unfair competition in violation of the California Unfair Business
26 Practices Act, Cal. Bus. & Prof. Code, § 17200 *et. seq.*

27 41. Upon information and belief, Defendant's deceptive, unfair, and
28 fraudulent business practices were willfully undertaken with full knowledge of the

1 Classic Ultra Mini Trade Dress and with the intent to misappropriate Deckers' goodwill
2 and reputation established in the UGG® Classic Ultra Mini.

3 42. As a direct and proximate result of the foregoing acts, Deckers has suffered
4 and will continue to suffer significant injuries in an amount to be determined at trial.

5 43. Deckers is entitled to all available relief provided for under the California
6 Unfair Business Practices Act, Cal. Bus. & Prof. Code, § 17200 *et. seq.*, including an
7 accounting and disgorgement of all illicit profits that Defendant made on account of its
8 deceptive, unfair, and fraudulent business practices.

9 44. Furthermore, because Deckers has no adequate remedy at law for
10 Defendant's ongoing unlawful conduct, Deckers is entitled to injunctive relief
11 prohibiting Defendant from unfair competition.

12 **FOURTH CLAIM FOR RELIEF**

13 **(Unfair Competition – California Common Law)**

14 45. Deckers incorporates by reference each and every one of the preceding
15 paragraphs as though fully set forth herein.

16 46. Defendant's misappropriation and unauthorized use of the Classic Ultra
17 Mini Trade Dress to promote the Accused Product also constitutes unfair competition
18 in violation of common law of the state of California.

19 47. Deckers has expended substantial time, resources and effort in creating and
20 developing UGG® footwear, including the UGG® Classic Ultra Mini, the embodiment
21 of the Classic Ultra Mini Trade Dress, which consumers recognize as originating from
22 Deckers.

23 48. Upon information and belief, Defendant introduced Accused Product into
24 the stream of commerce in order to exploit Deckers' goodwill and the reputation
25 established in the UGG® Classic Ultra Mini for Defendant's own pecuniary gain.

26 49. Defendant's unauthorized use of the Classic Ultra Mini Trade Dress
27 resulted in Defendant unfairly benefitting from Deckers' goodwill and the reputation
28 established in the UGG® Classic Ultra Mini.

50. Upon information and belief, Defendant's unlawful acts are willful, deliberate, and intended to cause confusion among the public and taken in reckless disregard of Deckers' rights. As such, an award of exemplary and punitive damages is necessary in an amount sufficient to deter similar misconduct in the future.

51. As a direct and proximate result of the foregoing acts, Deckers has suffered and will continue to suffer significant injuries in an amount to be determined at trial. Deckers is entitled to recover all damages, including attorneys' fees, that Deckers has sustained on account of Defendant's unfair competition, and all gains, profits and advantages obtained by Defendant as a result of its unlawful acts. Furthermore, because Deckers has no adequate remedy at law for Defendant's ongoing unlawful conduct, Deckers is entitled to injunctive relief prohibiting Defendant from unfair competition.

FIFTH CLAIM FOR RELIEF

(Patent Infringement – U.S. Pat. No. D927,161)

52. Deckers incorporates by reference each and every one of the preceding paragraphs as though fully set forth herein.

53. In order to protect its valuable brands, Deckers owns a number of patents covering various styles of footwear it markets, including the UGG® Classic Ultra Mini described herein. These patents include U.S. Pat. No. D927,161 issued on August 10, 2021, a true and correct copy of which is attached hereto as **Exhibit A** and incorporated herein.

54. Deckers is the owner by assignment of all rights, title and interest in and to the '161 Patent issued in August 2021. Deckers marked substantially all footwear products embodying the design of the '161 Patent with "Patent # D927,161", and/or via virtual patent marking on a product label in compliance with 35 U.S.C. § 287, putting Defendant on notice of the '161 Patent.

55. Defendant have produced, imported into the U.S., distributed, advertised, marketed, offered for sale, and/or sold within the United States the Accused Product which bear a design substantially similar to the ornamental design of the '161 Patent,

1 in violation of 35 U.S.C. § 271.

2 56. Deckers has not granted a license or given Defendant any form of
3 permission to the '161 Patent and Defendant's infringement of the '161 Patent is
4 without Deckers' permission or authority and in total disregard of Deckers' intellectual
5 property rights.

6 57. As a direct and proximate result of the foregoing acts, Deckers has suffered
7 and will continue to suffer significant injuries in an amount to be determined at trial.
8 Deckers is entitled to recover all damages sustained on account of Defendant's
9 infringement, and all gains, profits and advantages obtained by Defendant under 35
10 U.S.C. §§ 284 and 289.

11 58. Upon information and belief, Defendant's infringing acts were willful,
12 deliberate, and taken in reckless disregard of the '161 Patent despite having been put on
13 notice through Deckers' patent marking. Defendant took these actions knowing the
14 objectively high likelihood that such actions constituted infringement of the '161 Patent.
15 As Defendant's willful acts render this an exceptional case, Deckers is entitled to
16 enhanced damages and reasonable attorney fees under 35 U.S.C. § 284.

17 59. Furthermore, unless Defendant's unlawful acts are enjoined by this Court,
18 there is no adequate remedy at law that can fully compensate Deckers for the harm
19 caused by Defendant's infringement of the '161 Patent, which is ongoing. Accordingly,
20 Deckers is entitled to injunctive relief under 35 U.S.C. § 283 prohibiting Defendant
21 from continuing to infringe the '161 Patent.

22 **PRAYER FOR RELIEF**

23 WHEREFORE, Plaintiff Deckers Outdoor Corporation respectfully prays for
24 judgment against Defendant Last Brand, Inc. dba Quince and DOES 1-10 as follows:

25 60. A judgment that Defendant infringed Deckers' Classic Ultra Mini Trade
26 Dress, and U.S. Pat. No. D927,161;

27 61. An order permanently enjoining and restraining Defendant, their agents,
28 servants, employees, officers, associates, and all persons acting in concert with any of

1 them from infringing Deckers' intellectual property at issue, including but not limited
2 to infringing acts such as:

- 3 a. manufacturing, importing, advertising, marketing, promoting,
4 supplying, distributing, offering for sale, or selling Accused Product or any
5 other products that bear an identical or confusingly similar design as Deckers'
6 Classic Ultra Mini Trade Dress;
- 7 b. manufacturing, importing, advertising, marketing, promoting,
8 supplying, distributing, offering for sale, or selling Accused Product or any
9 other products that infringe the '161 Patent;
- 10 c. engaging in any other activity constituting unfair competition with
11 Deckers, or acts and practices that deceive consumers, the public, and/or trade,
12 including without limitation, the use of designations and design elements used
13 or owned by or associated with Deckers; and
- 14 d. committing any other act which falsely represents or which has
15 the effect of falsely representing goods and services of Defendant are licensed,
16 authorized, offered, produced, sponsored, or in any other way associated with
17 Deckers;

18 62. An order requiring Defendant to recall from any distributors and retailers
19 and to deliver to Deckers for destruction any Accused Product, including the means of
20 making such products;

21 63. An order requiring Defendant to file with this Court and serve on Deckers
22 within thirty (30) days after entry of the injunction, a report in writing and under oath
23 setting forth the manner in which Defendant complied with the injunction;

24 64. An order for an accounting of all gains, profits and advantages derived by
25 Defendant on account of the unlawful acts complained of herein pursuant to 15 U.S.C.
26 § 1117(a), Cal. Bus. & Prof. Code, § 17200 *et. seq.*, and any other applicable federal
27 statute or California state and common law;

28 65. An award of damages equal to Defendant's profits and all damages

sustained by Deckers as a result of Defendant's wrongful acts;

66. An award of damages equal to treble Defendant's profits or Deckers' damages, whichever is greater, on account of Defendant's willful infringement;

67. An award of punitive damages and Deckers' costs, attorneys' fees, and interest as allowed under all applicable federal statutes and California state laws; and

68. All other relief that the Court may deem just and proper.

Dated: June 8, 2023

BLAKELY LAW GROUP

By: /s/ Jamie Fountain
Brent H. Blakely
Jamie Fountain
Attorneys for Plaintiff
Deckers Outdoor Corporation

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff Deckers Outdoor Corporation hereby demands a trial by jury as to all claims in this Civil Action.

Dated: June 8, 2023

BLAKELY LAW GROUP

By: /s/ Jamie Fountain
Brent H. Blakely
Jamie Fountain
Attorneys for Plaintiff
Deckers Outdoor Corporation

EXHIBIT A



US00D927161S

(12) **United States Design Patent** (10) **Patent No.:** **US D927,161 S**
Frain Terras (45) **Date of Patent:** **** Aug. 10, 2021**

(54) **FOOTWEAR UPPER**(71) Applicant: **Deckers Outdoor Corporation**, Goleta, CA (US)(72) Inventor: **Helene Anne Frain Terras**, Santa Barbara, CA (US)(73) Assignee: **Deckers Outdoor Corporation**, Goleta, CA (US)(**) Term: **15 Years**(21) Appl. No.: **29/712,480**(22) Filed: **Nov. 8, 2019**(51) **LOC (13) Cl.** **02-04**(52) **U.S. Cl.**
USPC **D2/970; D2/910**(58) **Field of Classification Search**

USPC D2/896, 901–905, 909–916, 918,
D2/919–922, 923–925, 935, 943, 944,
D2/961, 969, 970, 971, 979; 36/83, 84
CPC A43B 23/022; A43B 23/0225; A43B
23/0235; A43B 23/024; A43B 23/027;
A43B 23/04; A43B 23/045; A43B
23/047; A43B 23/00; A43B 23/02; A43B
23/0205; A43B 23/021; A43B 23/0215;
A43B 3/02; A43B 3/04; A43B 3/06;
A43B 3/08; A43B 1/00; A43B 1/02;
A43B 1/04; A43B 1/06; A43B 1/08;
A43B 1/10; A43B 1/14; A43B 5/00;
A43B 5/002; A43B 5/006; A43B 5/04;
A43B 5/0401; A43B 5/0405; A43B 5/06;
A43B 5/08; A43B 5/10; A43B 5/16;
A43B 5/1616; A43B 11/00; A43B 11/02
See application file for complete search history.

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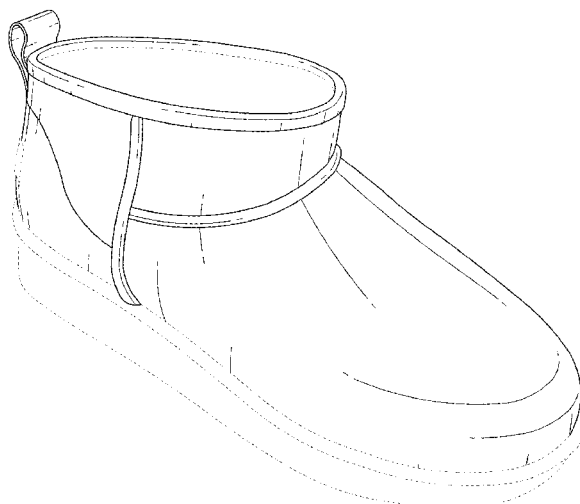
Primary Examiner — Elizabeth J Oswecki
Assistant Examiner — Yelizaveta Y Masalimova
(74) *Attorney, Agent, or Firm* — Greer, Burns & Crain,
Ltd.

(57) **CLAIM**

The ornamental design for a footwear upper, as shown and
described.

DESCRIPTION

FIG. 1 is a front perspective view of a footwear upper
showing my new design;
FIG. 2 is a side elevational view thereof;
FIG. 3 is an opposite side elevational view thereof;
FIG. 4 is a front elevational view thereof;
FIG. 5 is a rear elevational view thereof;
FIG. 6 is a top plan view thereof; and,
FIG. 7 is a bottom plan view thereof.
The broken lines in FIGS. 1-7 represent portions of the
footwear that form no part of the claimed design.

1 Claim, 3 Drawing Sheets

US D927,161 S

Page 2

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U.S. Patent

Aug. 10, 2021

Sheet 1 of 3

US D927,161 S

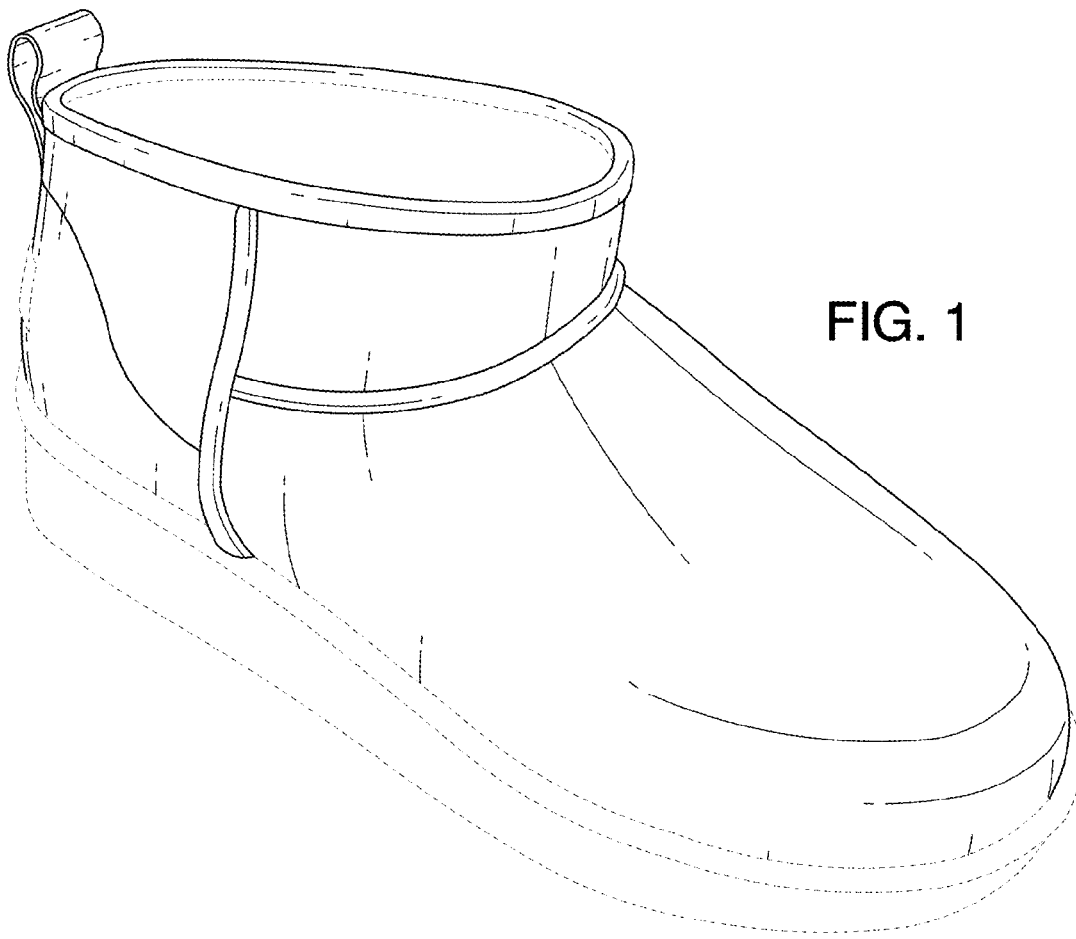


FIG. 1

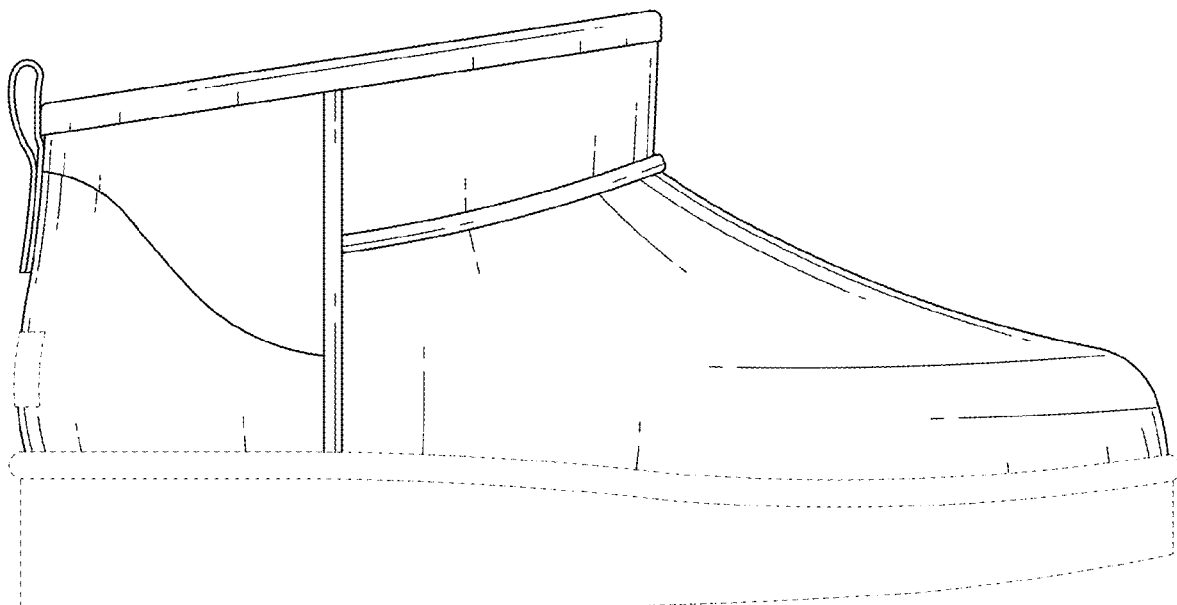


FIG. 2

U.S. Patent

Aug. 10, 2021

Sheet 2 of 3

US D927,161 S

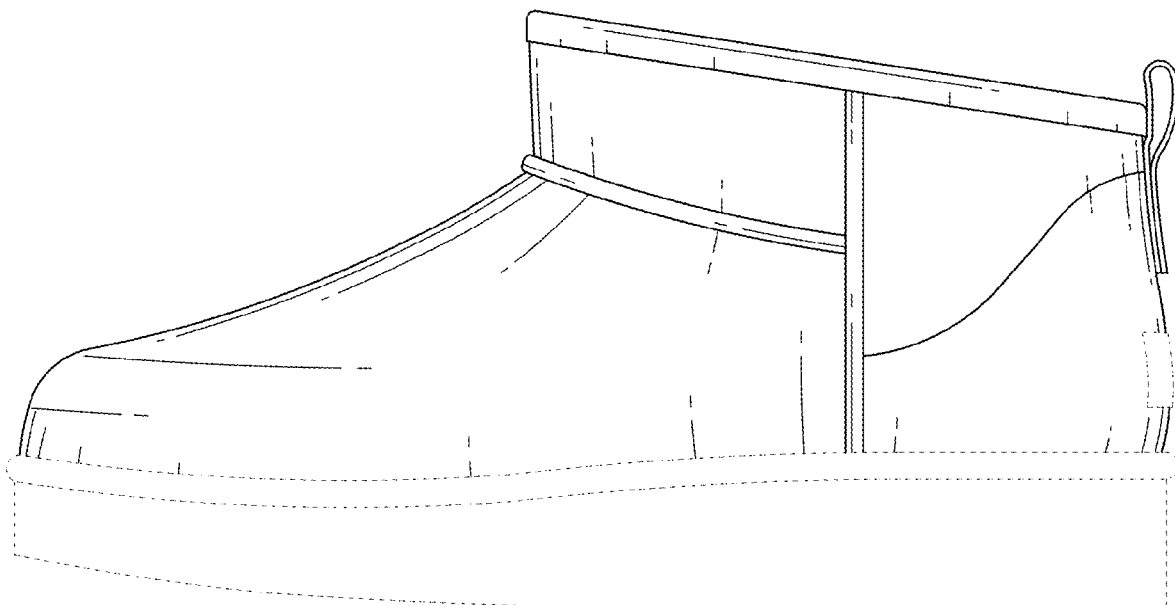


FIG. 3

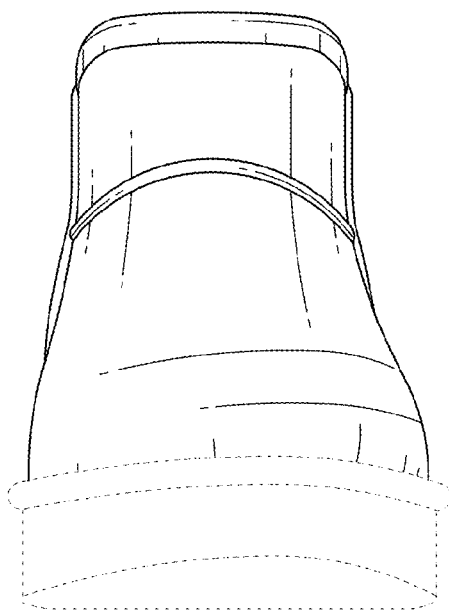


FIG. 4

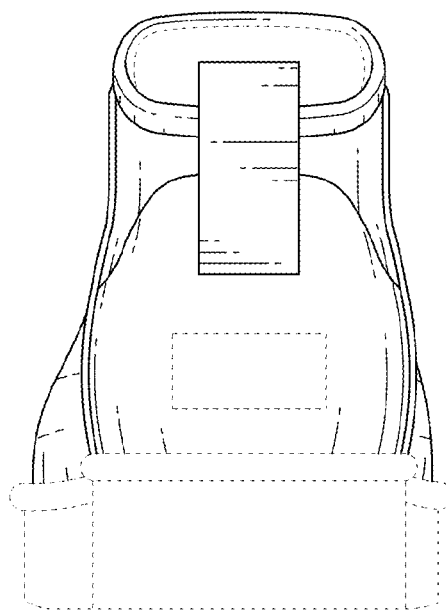


FIG. 5

U.S. Patent

Aug. 10, 2021

Sheet 3 of 3

US D927,161 S

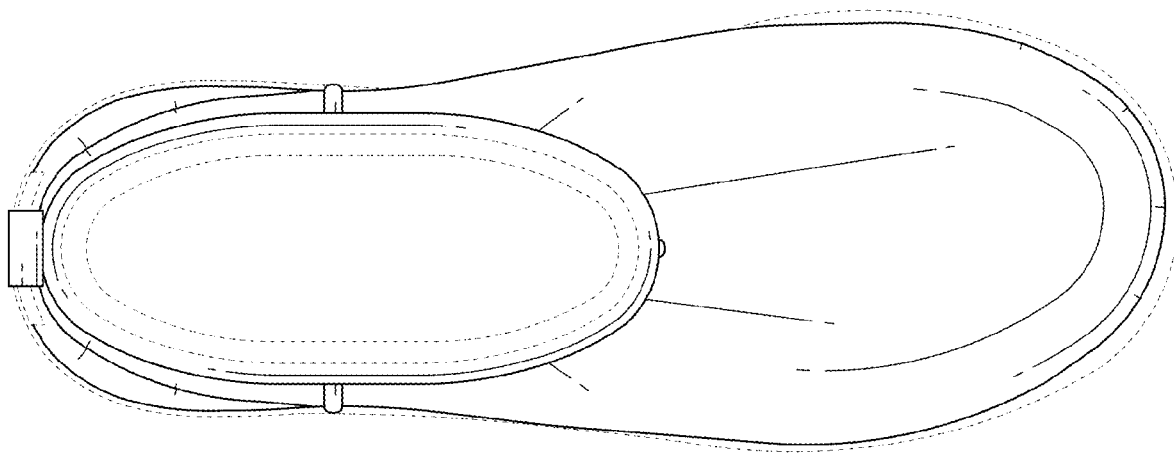


FIG. 6

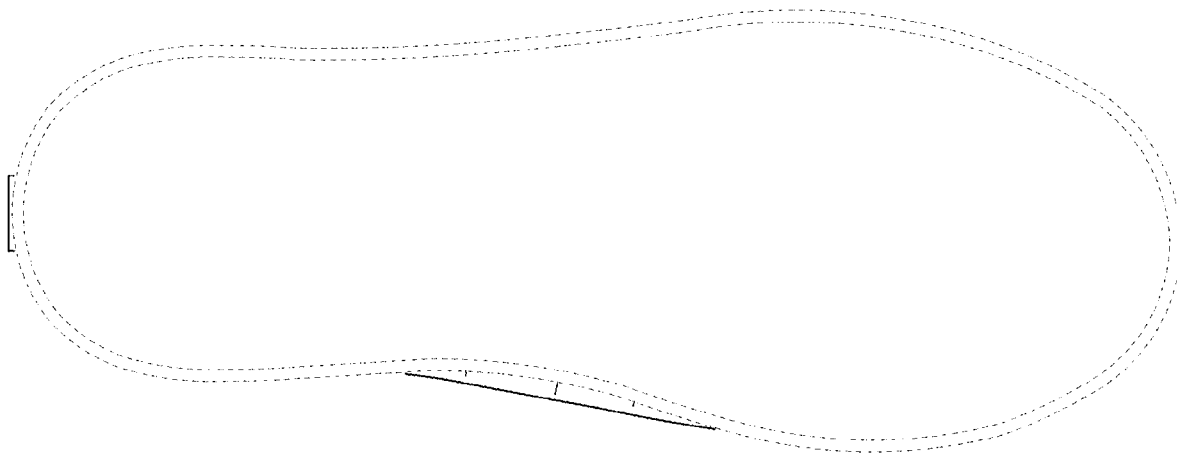


FIG. 7