



MAISON FONDÉE EN 1854

**By Electronic and First Class Mail**

February 29, 2012

Dean Michael A. Fitts  
University of Pennsylvania Law School  
3501 Sansom Street  
Philadelphia, Pennsylvania 19104

Re: IP Issues in Fashion Law

Dear Dean Fitts:

I am the Director of Civil Enforcement, North America, for Louis Vuitton Malletier ("Louis Vuitton"). I write to express our concerns over the unauthorized use of our trademarks to promote the March 20, 2012 Penn Intellectual Property Group event, "IP Issues in Fashion Law."

Louis Vuitton is the owner of world famous registered and common law trademarks, including the following trademarks as shown below (the "LV Trademarks"):



Georges Vuitton, Louis Vuitton's son, created the "Toile Monogram" pattern, comprised of the initial LV and three distinctive design elements -- a circle with a four-leafed flower inset; a curved beige diamond with a four-point star inset; and its negative -- in the 1890's to protect the Louis Vuitton brand from unlawful imitators. Since that time, Louis Vuitton has manufactured and sold products bearing the Toile Monogram and secured numerous federal trademark registrations for the LV Trademarks, including the Toile Monogram and each of the elements of the pattern.

Since its founding in 1854, Louis Vuitton has built up a worldwide reputation for its design, innovation, quality and style in women's and men's leather goods and fashion apparel and accessories. The LV Trademarks, including the Toile Monogram, are among the most famous trademarks in the luxury goods industry and the world. To help protect its valuable trademarks and to preserve the good will and exclusivity of Louis Vuitton designs, Louis Vuitton closely





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controls the sale of its products and the use of its trademarks, and has devoted and continues to devote substantial resources to protect the LV Trademarks.

While every day Louis Vuitton knowingly faces the stark reality of battling and interdicting the proliferation of infringements of the LV Trademarks, I was dismayed to learn that the University of Pennsylvania Law School's Penn Intellectual Property Group had misappropriated and modified the LV Trademarks and Toile Monogram as the background for its invitation and poster for the March 20, 2012 Annual Symposium on "IP Issues in Fashion Law." A copy of the invitation/poster is attached as Exhibit A.

This egregious action is not only a serious willful infringement and knowingly dilutes the LV Trademarks, but also may mislead others into thinking that this type of unlawful activity is somehow "legal" or constitutes "fair use" because the Penn Intellectual Property Group is sponsoring a seminar on fashion law and "must be experts." People seeing the invitation/poster may believe that Louis Vuitton either sponsored the seminar or was otherwise involved, and approved the misuse of its trademarks in this manner. I would have thought the Penn Intellectual Property Group, and its faculty advisors, would understand the basics of intellectual property law and know better than to infringe and dilute the famous trademarks of fashion brands, including the LV Trademarks, for a symposium on fashion law. (Louis Vuitton believes that education of the public about intellectual property issues is important and has sponsored such activities in the past. In fact, Louis Vuitton is a corporate sponsor of Fordham Law School's Fashion Law Institute).

Louis Vuitton is proud of its reputation for protecting intellectual property and creativity. We hope, and expect now that this action has been brought to your attention, that immediate steps will be taken to stop all use of this invitation/poster that violates the LV Trademarks. Please contact me within five days to assure me that steps have been taken to avoid confusion and dilution of the LV Trademarks. Your understanding and anticipated cooperation is appreciated.

Very truly yours,

  
Michael Pantalony, Esq.

Attachment

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# **EXHIBIT A**



**Penn Intellectual Property Group  
Annual Symposium**

# Fashion Law

**4:35 Panel 1  
Trademark and the Fast Fashion Phenomenon**

**Moderator: Gideon Parchomovsky, Penn Law**

Barton Beebe, NYU School of Law  
Avery Fischer, G.C., Ralph Lauren  
Young Kwon, G.C., Forever 21  
Susan Scafidi, Fordham Law School  
Suzanne White, Assoc. G.C., Coach, Inc.

**5:40 Panel 2  
Copyright for Fashion Design:  
Evaluating the IDPPPA**

**Moderator: Shyamkrishna Balganesh, Penn Law**

Johanna Blakley, Norman Lear Center, USC  
David Faux, New York State Bar Association,  
Fashion Law Committee Chair  
Barbara Kolsun, G.C., Stuart Weitzman  
Michelle Marsh, Kenyon & Kenyon LLP  
Staci Riordan, Fox Rothschild LLP

**6:45 Keynote  
"Copyright and the Fall Line"**

**David Nimmer**  
UCLA School of Law, Irell & Manella LLP

## March 20, 2012

4:30 p.m. to 7:45 p.m.  
Reception to follow.

Levy Conference Center  
University of Pennsylvania Law School

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