

1 VERSO LAW GROUP LLP  
 2 GREGORY S. GILCHRIST (Cal. Bar No. 111536)  
 3 RYAN BRICKER (Cal. Bar No. 269100)  
 4 SOPHY TABANDEH (Cal Bar No. 287583)  
 5 KOURTNEY SPEER (Cal. Bar No. 348243)  
 6 565 Commercial Street, 4th Fl.  
 7 San Francisco, California 94111  
 Telephone: (415) 534-0495  
 Email: greg.gilchrist@versolaw.com  
 ryan.bricker@versolaw.com  
 sophy.tabandeh@versolaw.com  
 kourtney.speer@versolaw.com

8 Attorneys for Plaintiff  
 9 PATAGONIA, INC.

10 **UNITED STATES DISTRICT COURT**  
 11 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**  
 12 **WESTERN DIVISION – LOS ANGELES**

13 PATAGONIA, INC.,  
 14  
 15 Plaintiff,  
 16  
 17 v.  
 18 ENTREPRENEUR ENTERPRISES,  
 19 INC. dba PATTIE GONIA  
 PRODUCTIONS and WYN WILEY,  
 20  
 21  
 22  
 23  
 24  
 25  
 26  
 27  
 28  
 Defendants.

Case No. 2:26-cv-0586

**COMPLAINT FOR TRADEMARK  
 INFRINGEMENT, DILUTION,  
 AND UNFAIR COMPETITION**

**ACTION SEEKING STATEWIDE  
 OR NATIONWIDE RELIEF**

**JURY TRIAL DEMAND**

1 INTRODUCTION

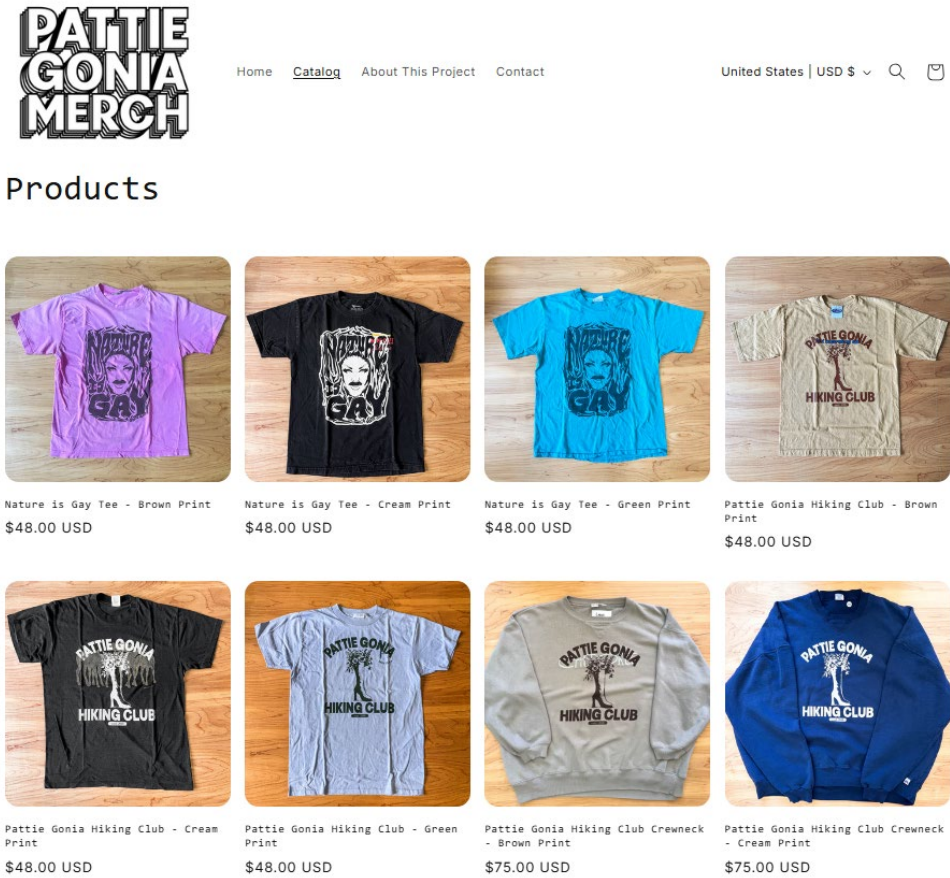
2 Plaintiff Patagonia, Inc. (“Patagonia”) brings this action against Entrepreneur  
3 Enterprises dba Pattie Gonia Productions and its owner, Wyn Wiley (collectively,  
4 “Pattie Gonia” or “Defendants”), in response to Defendants’ recent trademark  
5 application claiming the exclusive right to the brand PATTIE GONIA for, among  
6 other things, apparel, online marketing services, promoting public awareness of and  
7 motivational speaking services in support of environmental sustainability and  
8 LGBTQIA2S+ equality, organizing community sporting and cultural events,  
9 organizing, arranging, and conducting trail and hiking events, entertainment services  
10 in the nature of live musical performances, and music recordings. These products  
11 and services compete directly with the products and advocacy upon which Patagonia  
12 built its PATAGONIA brand over the last fifty-three years. The trademark  
13 application reflects Pattie Gonia’s departure from discrete use of a persona to  
14 engage in activism and confirms Defendants’ intent instead to launch a wide-  
15 ranging commercial enterprise under the PATTIE GONIA brand. This enterprise  
16 contradicts Defendants’ prior promises, and appropriates Patagonia’s brand and  
17 identity in a way that has already confused consumers, and will continue to confuse  
18 consumers, about Patagonia’s role in producing or sponsoring Pattie Gonia’s  
19 products, events and public appearances. Patagonia supports advocacy and activism  
20 that promote the environment and inclusion in the outdoors, central to Pattie Gonia’s  
21 ostensible mission. For that reason, before Pattie Gonia’s activities and identity  
22 transformed into a commercial enterprise, Patagonia repeatedly communicated with  
23 Pattie Gonia and understood that the parties had reached agreement about how that  
24 advocacy work might continue in a way that would not interfere with Patagonia’s  
25 brand. Pattie Gonia has not honored the agreement, however, and now seeks  
26 exclusive ownership of a PATTIE GONIA trademark to commercialize products,  
27 endorsements, marketing campaigns, and advocacy. For all these reasons, Patagonia  
28 must protect its iconic trademarks, even when it supports or agrees with Pattie

1 Gonia’s views, message, or objectives.

2 Defendants’ trademark application followed the launch of a commercial  
3 website, pattiegoniamerch.com, in late 2024, selling “Pattie Gonia” branded apparel.

4 The website looks like this today:

5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21 //  
22 //  
23 //  
24 //  
25 //  
26 //  
27 //  
28 //



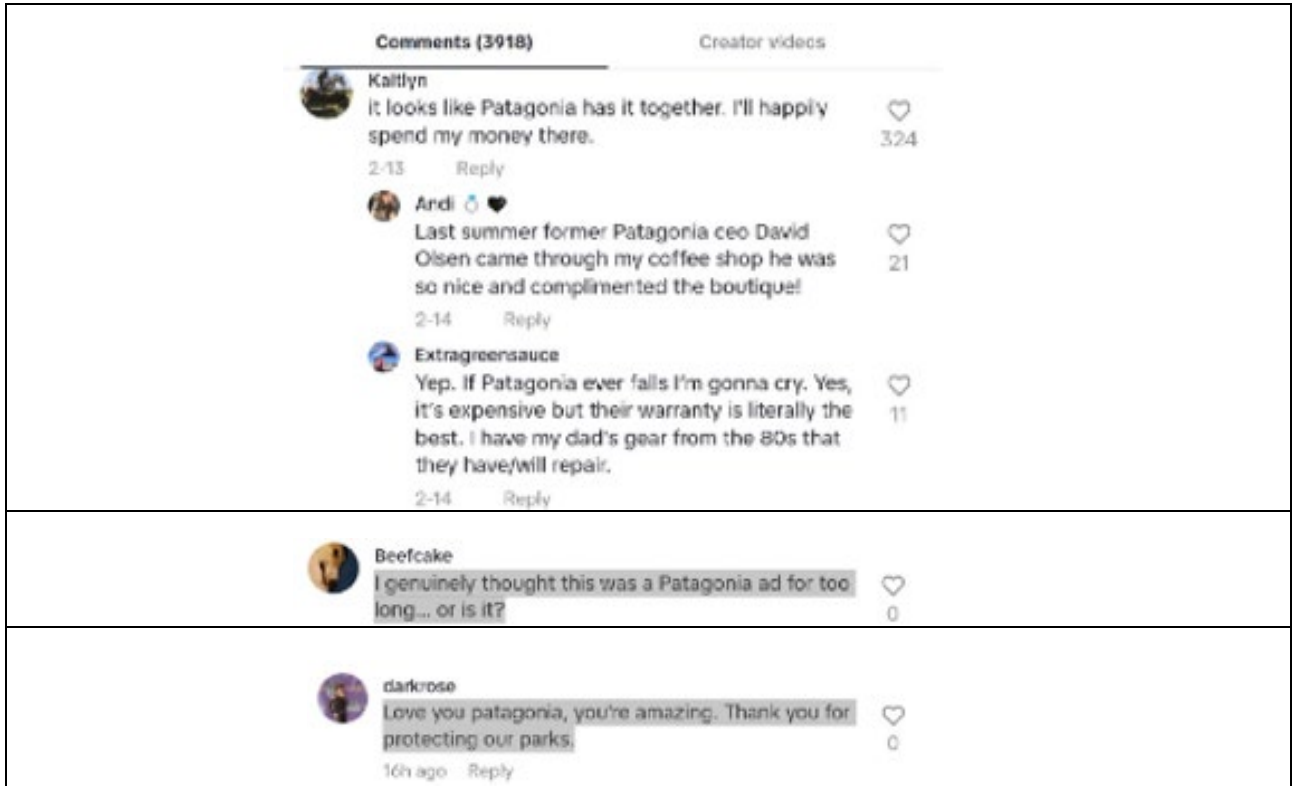
1 The examples below show the extent to which Pattie Gonia has associated the  
2 parties' brands, integrating Patagonia's logo and branding into the Pattie Gonia  
3 persona and related business enterprises:



//

//

1 Consumers are already confused about whether PATTIE GONIA is affiliated  
 2 with Patagonia. For example, consumers have made the following comments in  
 3 response to PATTIE GONIA’s social media posts:



17 Patagonia tried to work with Pattie Gonia to avoid this outcome. In February  
 18 2022, when Hydroflask was discussing a collaboration with Pattie Gonia,  
 19 Hydroflask contacted Patagonia to ensure Patagonia did not object to the proposed  
 20 collaboration. The parties met and discussed restrictions on the use of “Pattie  
 21 Gonia” to protect against confusion about the source of products or advocacy  
 22 connected to Pattie Gonia. Pattie Gonia confirmed an understanding that she must  
 23 refrain from selling PATTIE GONIA-branded products or using fonts or designs  
 24 that copy, or are substantially similar to, Patagonia’s logos.

25 Ultimately, Pattie Gonia ignored the agreement she had reached with  
 26 Patagonia and began selling products under the PATTIE GONIA brand. In early  
 27 2025, after seeing Pattie Gonia selling PATTIE GONIA-branded apparel on Pattie  
 28 Gonia’s pattiegoniamerch.com website, Patagonia again asked that Defendants stop

1 commercial use of the PATTIE GONIA name and abide by the 2022 understanding.  
2 Within several months, Pattie Gonia’s actions confirmed that she did not intend to  
3 abide by the understanding the parties reached in February 2022. Pattie Gonia  
4 restocked a full line of PATTIE GONIA apparel and filed a trademark application,  
5 confirming Pattie Gonia’s intention to secure rights in a competing and confusing  
6 brand, used to sell many of the same types of products and services that Patagonia  
7 has offered for decades.

8 Despite Patagonia’s efforts to avoid this dispute, it is left with no choice but  
9 to seek relief from the Court due to Pattie Gonia’s refusal to honor the parties’ prior  
10 understandings, the commercialization of the PATTIE GONIA brand, the use of the  
11 brand on confusingly similar products and services, and Pattie Gonia’s use of  
12 Patagonia’s logos. To prevent further damage to consumers, Patagonia, and its  
13 brand, Patagonia further alleges as follows:

14 **PARTIES, JURISDICTION, AND VENUE**

15 1. Patagonia, Inc. (“Patagonia”) is a California corporation headquartered  
16 at 259 West Santa Clara Street, Ventura, California 93001. Patagonia has been  
17 designing, developing, marketing, and selling outdoor apparel, accessories, and  
18 active sportswear for nearly fifty years. Patagonia’s PATAGONIA brand and P-6  
19 logo are famous in the United States and around the world and instantly recognized  
20 by consumers as a symbol of innovative apparel designs, quality products, and  
21 environmental and corporate responsibility.

22 2. Defendant Entrepreneur Enterprises dba Pattie Gonia Productions is an  
23 Oregon corporation with its principal place of business in Bend, Oregon 97703.  
24 Pattie Gonia Productions applied on September 21, 2025, to register PATTIE  
25 GONIA as a trademark, Serial Number 99/404,728, in five classes: 009 (recorded  
26 music); 016 (stickers and posters); 025 (clothing); 035 (marketing services); and 041  
27 (entertainment comprised of live music, performances, “motivational speaking  
28 services in the field of equality and environmentalism”).

1           3. Defendant Wyn Wiley (“Wiley”) is, on information and belief, an  
2 individual residing in Bend, Oregon 97703. Wiley is the founder and owner of  
3 Entrepreneur Enterprises dba Pattie Gonia Productions. Wiley has developed,  
4 controlled and implemented the PATTIE GONIA “persona” and brand, and has  
5 personally directed the use of Patagonia’s logos and branding.

6           4. Entrepreneur Enterprises dba Pattie Gonia Productions and Wyn Wiley  
7 are collectively referenced in this Complaint as “Defendants” or “Pattie Gonia.”

8           5. Patagonia’s trademark claims arise under the Trademark Act of 1946  
9 (the Lanham Act), as amended by the Trademark Dilution Revision Act of 2006  
10 (15 U.S.C. §§ 1051, *et seq.*). This Court has jurisdiction over such claims pursuant  
11 to 28 U.S.C. §§ 1338(a) and 1338(b) (trademark and unfair competition), 28 U.S.C.  
12 § 1331 (federal question), and 15 U.S.C. § 1121 (Lanham Act). This Court has  
13 jurisdiction over the state law claims under 28 U.S.C. § 1367 (supplemental  
14 jurisdiction) and 28 U.S.C. § 1332 (diversity).

15           6. This Court has personal jurisdiction over Defendants because  
16 Defendants have purposefully availed themselves of the privilege of doing business  
17 in this district. Pattie Gonia markets, sells, and ships products bearing the PATTIE  
18 GONIA trademark to residents in this district. Pattie Gonia has performed under the  
19 PATTIE GONIA name in this district, including at the Bellwether Theater in Los  
20 Angeles in June 2025. On information and belief, Pattie Gonia sold PATTIE  
21 GONIA-branded products to residents of this district in connection with such  
22 performances. Pattie Gonia also filmed multiple episodes of the Go Gently  
23 television program in this district, including episodes in Los Angeles and Ventura,  
24 California.

25           7. Venue is proper in this Court under 28 U.S.C. §§ 1391(b) and 1400(a)  
26 because Pattie Gonia infringes Patagonia’s intellectual property in this district,  
27 transacts business in this district, and a substantial part of the events giving rise to  
28 the claims asserted arose in this district.

1 **FACTUAL ALLEGATIONS COMMON TO ALL CLAIMS**

2 **Patagonia’s History**

3 8. Patagonia was founded in the late 1960s to design and sell climbing  
4 clothes and other active sportswear. The company adopted the brand  
5 “PATAGONIA” to differentiate a related business that designed and manufactured  
6 climbing gear and tools. Since at least 1973, the PATAGONIA brand has appeared  
7 on a multi-colored label inspired by a silhouette of the jagged peaks of the Mt. Fitz  
8 Roy skyline (the “P-6 logo”).

9 9. In the fifty years since Patagonia’s business started, the PATAGONIA  
10 brand and its P-6 logo have become among the most identifiable brands in the  
11 world. Patagonia’s products now include a wide range of apparel products and  
12 equipment, including t-shirts, hoodies, sweatshirts, and fleece, as well as technical  
13 products designed for climbing, skiing and snowboarding, surfing, fly fishing, and  
14 trail running, which are sold around the world. In 2012, Patagonia launched  
15 PATAGONIA PROVISIONS, a food business that promotes responsible sourcing  
16 and regenerative solutions in fisheries, agriculture, and land stewardship.

17 10. As part of its longstanding commitment to the environment, Patagonia  
18 also produces books, films and educational awareness materials that are distributed  
19 through bookstores and theaters, in addition to its website and social media  
20 channels. Patagonia has published books including *Tools for Grassroots Activists*  
21 (and a second edition, *Tools to Save Our Home Planet*), a guide for effective  
22 environmental advocacy; and *The Responsible Company*, which chronicles  
23 Patagonia’s approach to responsible business practices and corporate citizenship.  
24 Patagonia’s films include *Newtok*, documenting America’s first climate-displaced  
25 community; *Public Trust*, which explores the fights over America’s public lands;  
26 and *Artifishal*, which exposes the threats to river ecosystems from hatcheries and  
27 dams, and the impacts of open ocean fish farms. Patagonia has also produced *Why*  
28 *Plastic?*, which investigates the apparel industry’s dependence on plastics, as well

1 as *Damnation*, which highlighted the negative ecological and climate impacts of  
2 dams.

3 11. To further engage its community in activism, Patagonia launched  
4 Patagonia Action Works in 2018, a platform to connect the hundreds of non-profits  
5 that receive grants from Patagonia each year (see more below) with our community  
6 of activists who are looking for a place to connect with events, donate their skills  
7 and money, and sign petitions. Since the platform was launched, more than 500,000  
8 people have provided over 2 million actions to 3,000 organizations. In 2025,  
9 Patagonia co-founded Brands for Public Lands, which now includes 100 companies  
10 representing 62,000 employees across twenty-eight states and more than \$19.9  
11 billion in revenue, to amplify the voice of the outdoor industry against multiple  
12 attempts to roll back protections on federal public land.

13 12. Over the years, Patagonia has been recognized and honored for its  
14 business initiatives, including receiving the Sustainable Business Counsel’s first  
15 “Lifetime Achievement Award,” the UN Global Climate Action Award, and B  
16 Lab’s “Best of the World” B Corp Award.

17 13. In 1996, with an increased awareness of the dangers of pesticide use  
18 and synthetic fertilizers used in conventional cotton growing, Patagonia began  
19 exclusively using organic cotton. In 2017, Patagonia helped establish the  
20 Regenerative Organic Certified® program, a holistic agriculture certification  
21 encompassing pasture-based animal welfare, fairness for farmers and workers, and  
22 robust requirements for soil health and land management. In Spring 2022,  
23 Patagonia released its first Regenerative Organic Certified® products. Patagonia has  
24 also worked to remove virgin synthetic materials from its product line, and, as of  
25 2025, 93% of the polyester in its products is recycled, while 89% of the nylon is  
26 recycled. Beginning in 2025, all new Patagonia products are made without  
27 intentionally added PFAS.

28 14. Patagonia was a founding member of the Fair Labor Association®,

1 which is an independent multi-stakeholder verification and training organization that  
2 audits apparel factories and now includes over 200 members. In 2014, Patagonia  
3 began partnering with Fair Trade USA, through which Patagonia pays a premium  
4 that goes directly to factory employees making its products. This year, 95% of  
5 Patagonia's product line was made in a Fair Trade Certified factory, impacting more  
6 than 85,000 people in Patagonia's supply chain. Patagonia has paid \$37 million in  
7 Fair Trade premiums to those making its products since the program began.

8 15. Additionally, since 1985, Patagonia has pledged 1% of sales to  
9 environmental groups to preserve and restore our natural environment, donating  
10 more than \$250 million to date. In 2002, Patagonia's founder, Yvon Chouinard,  
11 along with others, created a non-profit called 1% for the Planet<sup>®</sup> to encourage other  
12 businesses to do the same. Today, 1% for the Planet<sup>®</sup> members have donated more  
13 than \$820 million to as many as 4400 eligible organizations that are fighting climate  
14 change.


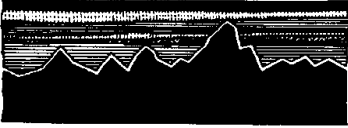
15 16. In 2012, Patagonia became one of California's first registered Benefit  
16 Corporations, ensuring Patagonia could codify into its corporate charter  
17 consideration of its workers, community, and the environment. During its 2024 B  
18 Lab recertification, Patagonia obtained a B Impact Score of 166, more than triple the  
19 median score of businesses who complete the B Impact Assessment.

20 17. In 2022, Patagonia's owners restructured the company by giving away  
21 all their stock to entities designed to do two things: put those assets to work fighting  
22 the climate crisis and protect the purpose and values of the company forever. The  
23 new owners of the company became the Patagonia Purpose Trust, protecting the  
24 purpose and values of the company, and Holdfast Collective, putting the stock and  
25 future profits to work fighting the climate and ecological crisis. Since this new  
26 structure was created, Holdfast Collective has committed more than \$180 million  
27 toward projects fighting the climate and ecological crisis.

28

**Patagonia's Trademarks**

18. Patagonia owns numerous registrations for its distinctive PATAGONIA trademark and P-6 logo, covering a wide-ranging assortment of products (including all the products and services covered by Pattie Gonias trademark application). Among these are the following U.S. trademark registrations:

Trademark	Reg. No. / Reg. Date	Goods	Date of First Use
PATAGONIA	1189402 / Feb. 9, 1982	Men's and Women's Clothing-Namely, Sweaters, Rugby Shirts, Walking Shorts, Trousers, Jackets, Mittens, Hoods and Rainwear	08/1974
	1294523 / Sept. 11, 1984	Men's, Women's and Children's Clothing-Namely, Jackets, Pants, Vests, Gloves, Pullover, Cardigans, Socks, Sweaters, Underwear, Shirts, Shorts, Skirts and Belts	08/1974- 1981
	1547469 / July 11, 1989	Men's, Women's and Children's Clothing- Namely, Jackets, Pants, Shirts, Sweaters, Vests, Skirts, Underwear Tops and Bottoms, Socks, Gloves, Mittens, Hats, Face Masks, Balaclava, Gaiters, Suspenders, and Belts	08/1974- 1981
PATAGONIA	2260188 / July 13, 1999	Computerized on-line ordering activities in the field of clothing and accessories; Providing information in the field of technical clothing and accessories for use in recreational, sporting and leisure activities; providing information in the field of existing and evolving environmental issues	10/1995

Trademark	Reg. No. / Reg. Date	Goods	Date of First Use
<b>PATAGONIA.COM</b>	75577954 / Oct. 10, 2000	On-line retail store and mail order services featuring technical clothing footwear, and accessories; Computer services in the nature of on-line information related to the environment and clothing	10/1995
<b>PATAGONIA</b>	6665425 / March 8, 2022	Education and entertainment services, namely, organizing and conducting ambassador programs and related events in the nature of recreational activities and sporting events to drive positive social and environmental change for educational purposes; developing, arranging, and conducting educational conferences, programs and courses in the field of environmental issues and activism; providing panel discussions in the fields of environmental issues, climate change and regenerative agriculture; providing a website featuring information in the field of environmental education and non-downloadable videos in the field of environmental education and awareness; online web journal, namely, blogs in the fields of the environment, outdoor sports and activities, and technical equipment, gear and clothing relating to such activities	12/1994
<b>PATAGONIA</b>	2662619 / Dec. 17, 2002	Retail store services featuring clothing, footwear, luggage and a wide variety of sporting goods and accessories	06/1986

Trademark	Reg. No. / Reg. Date	Goods	Date of First Use
<b>PATAGONIA</b>	5561006 / Sept. 11, 2018	Stickers; paper banners; fiction and non-fiction books on a variety of topics; posters; non-magnetically encoded gift cards; photographs	12/1991
<b>PATAGONIA</b>	4210088 / Sept. 18, 2012	Film and video production services; producing documentary films, videos, and web content on issues relating to the environment	03/2000
<b>PATAGONIA BOOKS</b>	4416959 / Oct. 15, 2013	Books primarily in the fields of biographies, discovering and appreciating nature, surfing, rock and mountain climbing and other sport/adventures, the environment, and business practices  Publishing of printed matter, books and electronic books; entertainment services, namely, providing information and commentary in the fields of authors, books, literary works and recommendations as to the same; providing a web site where users can post ratings, offer reviews and recommendations on literary works, books and printed matter	12/2007
<b>PATAGONIA FILMS</b>	5915849 / Nov. 19, 2019	Entertainment Services, namely, distributing and presentation of films and production and distribution of videos in the field of sports, current affairs, entertainment, lifestyle, politics, economics, government affairs, public policy, activism and environmental issues	11/2016

Trademark	Reg. No. / Reg. Date	Goods	Date of First Use
<b>PATAGONIA STORIES</b>	7308939 / Feb. 20, 2024	Entertainment services, namely, providing podcasts in the field of environmental news, causes and activism; Entertainment and education services, namely, providing a website featuring information and non-downloadable articles about the environment and activism	12/2022

These registrations for Patagonia’s trademarks and logos are in full force and effect. The registrations (with the exception of Reg. No. 6665425) have become incontestable under 15 U.S.C. § 1065. A color image of the P-6 logo follows:



Collectively, these marks, Patagonia’s other registered trademarks, and its common law marks are referred to as the “PATAGONIA trademarks.”

19. The PATAGONIA trademarks are distinctive, arbitrary and fanciful, entitled to the broadest scope of protection, and certain of the PATAGONIA trademarks are registered worldwide.

20. For many years before any use of Pattie Gonia or Defendants’ other related logos challenged in this complaint, Patagonia annually and continuously has spent enormous amounts of time, money, and effort advertising and promoting the products on which its PATAGONIA trademarks are used. PATAGONIA brand products are advertised and promoted through a variety of channels and media, including in print and on the Internet. In addition to advertising by Patagonia, the

1 PATAGONIA trademarks are also advertised and promoted and presented at point of  
2 sale by numerous authorized retailers. Consumers, accordingly, are exposed to the  
3 PATAGONIA trademarks in a wide range of shopping and post-sale contexts, in  
4 addition to media Patagonia earns from its commitment to environmental justice.

5 21. Patagonia has sold its PATAGONIA brand products and distributed its  
6 PATAGONIA brand services all over the world, including throughout the United  
7 States and California. Through its promotion and investment in its brand and  
8 extensive sales, publicity, awards, and leadership trying to minimize the  
9 environmental impact of its business, Patagonia has acquired enormous goodwill in  
10 its PATAGONIA trademarks. The PATAGONIA trademarks are famous within the  
11 meaning of the Trademark Dilution Revision Act, enjoy strong consumer  
12 recognition, and are recognized around the world and throughout the United States  
13 by consumers as signifying high-quality products made by a responsible company.

#### 14 **Defendants' Infringement of Patagonia's Rights**

15 22. Contrary to Pattie Gonia's 2022 commitment to respect Patagonia's  
16 trademark rights, and notwithstanding Patagonia's objections and warnings, Pattie  
17 Gonia has adopted and used PATTIE GONIA – a nearly-identical copy of  
18 Patagonia's PATAGONIA word mark – to identify Defendants as the source of a  
19 wide range of products and services as outlined in Defendants' trademark  
20 applications, including apparel, online marketing services, promoting public  
21 awareness of and motivational speaking services in support of environmental  
22 sustainability and LGBTQIA2S+ equality, organizing community sporting and  
23 cultural events, organizing, arranging, and conducting trail and hiking events,  
24 entertainment services in the nature of live musical performances, and music  
25 recordings. These uses of the PATTIE GONIA brand inevitably imply to  
26 consumers that Patagonia has endorsed or authorized these products and services (as  
27 expected, confusion already has occurred), or that the products and services are the  
28 result of a collaboration between Patagonia and Pattie Gonia. The PATTIE

1 GONIA-branded products and services are referenced in this Complaint as  
2 Defendants’ “Pattie Gonia Products.”

3 23. Examples of Pattie Gonia Products follow:





← FULL MUSIC LINEUP

**Pattie Gonia**

**Mural Stage**  
 Saturday, Aug 30th  
 9:30 PM - 10:45 PM

24. While Defendants only recently have (a) commercialized PATTIE GONIA as a brand, (b) promoted PATTIE GONIA apparel releases (including through pattiegoniamerch.com), and (c) filed an application for trademark at the Patent and Trademark Office, Patagonia first addressed this potential conflict in February 2022 when it was raised by Hydroflask, which was then a potential Pattie Gonia collaborator. At that time, as explained below, Patagonia shared concerns with Pattie Gonia and reached an understanding that Pattie Gonia would not commercialize the name as a brand.

25. In early-2022, Patagonia learned that Pattie Gonia was planning fundraising partnerships with outdoor accessory and apparel companies, Hydroflask and The North Face, one of Patagonia's top competitors. Hydroflask was concerned that Patagonia might view this type of promotional work under the PATTIE GONIA name as likely to confuse consumers about an association between Hydroflask and Patagonia. Hydroflask consequently reached out to Patagonia to discuss the proposed collaboration. All three parties met and Patagonia explained Patagonia's need to protect the PATAGONIA trademarks, including – while trying to leave space for Pattie Gonia's fundraising in support of environmental causes – requiring that PATTIE GONIA refrain from using the term as a brand or source indicator in any collaborations or commercial activities.

26. At the conclusion of those discussions, Patagonia and Pattie Gonia

1 reached an understanding, memorialized in emails dated February 9, 2022; February  
2 10, 2022, February 15, 2022; and February 16, 2022. Those emails, with only some  
3 personal identifying information redacted, are reproduced below:

4

5 *February 9, 2022 Email from Patagonia:*

6

7 **Subject:** Hydroflask / Pattie Gonia / Patagonia

8

9 Hi All,

10

11 Pattie, thank you for the call today I really appreciate the time and thoughtful conversation. [REDACTED]  
12 thank you for reaching out to us on this and for your patience as I worked through this on my end. Also want  
13 to note that email is horrible for nuance and open conversation – so if there is anything in here that comes off  
14 differently than our conversation Pattie, that is solely a failure in my drafting. Please let me know if something  
15 in here strikes you as different than our conversation and lets discuss it.

15

16 Patagonia has no objection to the relationship between Hydroflask and Pattie Gonia, in particular the work  
described in your email last week [REDACTED], but we do asks that the parties:

17

1. Not use or otherwise display Patagonia’s logos
- 18 2. Not use the “belwe font” in the content that is created (Including an example here since [REDACTED]  
asked about this when I called him this afternoon )
- 19 3. Not use Pattie Gonia in any form on product

20

21 I hope the three points above give you a clear sense of where we are coming from, and give you confidence  
22 to move forward with your partnership and do great work together. If there are any questions as the work  
progresses, please don’t hesitate to reach out to me.

23

24

25 Gratefully,

26

27

28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

*February 10, 2022 Email from Pattie Gonia:*

**Subject:** Re: Hydroflask / Pattie Gonia / Patagonia

Robert, [REDACTED] thank you all so much for your handling of this issue and for including us in the discussion. We really appreciate each of you so much. Cannot wait to get things going! Super excited.

**Pattie Gonia / Wyn Wiley** (she/he/they)

Drag Queen, Professional Homosexual & Intersectional Environmentalist

**Jenny Dugan** (she/her)

Production Manager

*February 15, 2022 Email from Patagonia:*

Hi All,

One clarification/addition I should make to this regarding use of Patagonia's logos. Patagonia would ask that the parties not use Patagonia's logos *or any substantially similar designs* like the mask meme logo we discussed Pattie that used the mountain silhouette and belwe font. I think that additional language accurately reflects our conversations, and sorry for not being more clear in the first go at this. As before, I welcome any conversations/feedback. I just didn't want to leave my potential miscommunication hanging out there.

Best,

*February 16, 2022 Email from Pattie Gonia:*

**Subject:** Re: Hydroflask / Pattie Gonia / Patagonia

Thank you for the clarification Robert! Really appreciate it and keep note of it.

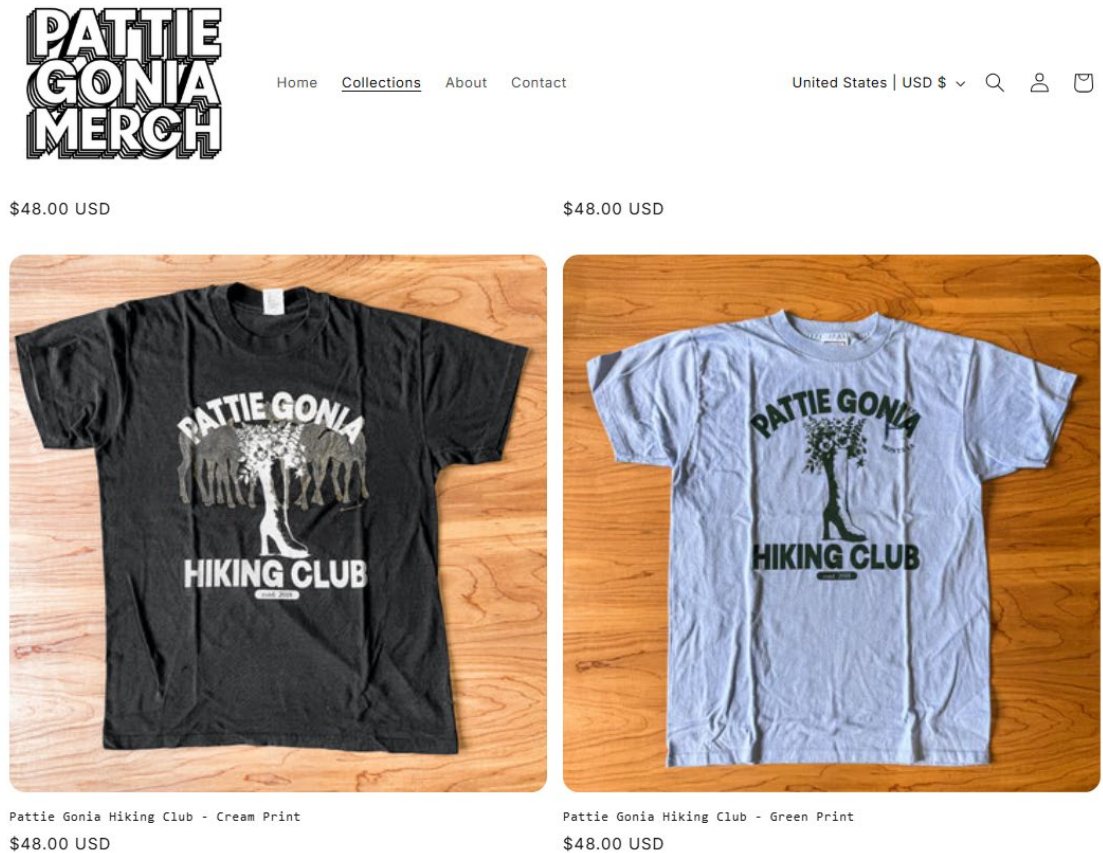
**Jenny Dugan** (she/her)

Production Manager

**Pattie Gonia / Wyn Wiley** (she/he/they)

Drag Queen, Professional Homosexual & Intersectional Environmentalist

27. Despite these communications, Patagonia is informed and believes that Pattie Gonia registered the domain name, pattiegoniamerch.com, in September 2024. Afterwards, Pattie Gonia posted silkscreened apparel products bearing the PATTIE GONIA brand.



28. After discovering the PATTIE GONIA e-commerce store and related Pattie Gonia Products (including apparel and stickers), Patagonia wrote to remind Pattie Gonia of the parties' agreement in 2022 and to explore a resolution ensuring that Pattie Gonia would adhere to those commitments. Patagonia's email, sent February 10, 2025, is reproduced below, along with Pattie Gonia's response, sent February 14, 2025. Patagonia's follow up on March 12, 2025, to which it received no response, is also reproduced below:

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

*February 10, 2025 Email from Patagonia:*

Dear Pattie:

I hope you are well, it has been what feels like a few lifetimes since we spoke in 2022. I'm writing to you now because I saw the recent announcements about product sales of t-shirts featuring "Pattie Gonia" branding as well as more sales of the stickers including Patagonia's logo. I am writing, somewhat more formally this time, to stress again how important it is to Patagonia that Pattie Gonia maintain their identity as a persona, but not to use that persona in connection with commercial sales or advertising of products. Trademark law requires Patagonia to affirmatively protect its trademarks against all potential infringement even where the company is aligned with the purpose and goals of Pattie Gonia the persona.

My takeaway from our conversation and email follow up from 2022 was that, while Patagonia admires the climate work Pattie does, Pattie would:

1. Not use or otherwise display Patagonia's logos or any substantially similar designs
2. Not use the "belwe font" in content supporting the sales
3. Not use Pattie Gonia in any form on product.

The examples I've seen from social media posts include products that implicate each one of these points that I thought we'd agreed upon.



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



Patagonia remains supportive of your work but must insist that the Pattie Gonia persona not be commercialized and continue to adhere to the commitments made in 2022. Unfortunately, these latest product sales force Patagonia's hand and so I'm asking that you discontinue sales of t-shirts and stickers (or any product) using Pattie Gonia branding or designs substantially similar to Patagonia's logos.

I hope we are able to work this out, so please call me if talking through this would be helpful.

Best,

*February 14, 2025 Email from Pattie Gonia:*

Hi Rob,

Pattie here with my business partner Jenny who you met on zoom. Thanks for the email and the concern. What you shared in your previous email was incorrect.

What we shared on our call 2022 was the following:

- 
- 
- Pattie Gonia the drag queen and environmentalist is inspired by a region in South America. It's wonderful that both Patagonia the brand and Pattie Gonia the drag queen are inspired by Patagonia's beauty.
- 
- 
- We also shared that any and all references to the brand Patagonia font or brand logo in association to Pattie Gonia was done by a fan as fan art. We have never sold this fan art.
-

1 Bringing the conversation to today, the brand Patagonia's communication earlier this week was coincidental timing. We were actually just  
2 about to reach out to the brand Patagonia! We wanted to let the brand know that, in light of what we are learning about Lost Arrow, we intend  
to avoid any perceived association with the brand Patagonia.

3 Lost Arrow, under the brand Patagonia's ownership, developed and sold tactical and military gear to the US government and police departments  
4 across the nation for years/decades? (bit blurry there as we're still fielding information from former employees). Beyond Lost Arrow's police &  
5 military business purpose, we are concerned about the clear cultural appropriation with the name "Lost Arrow." Furthermore, the quick sale of  
6 the Lost Arrow division during the height Black Lives Matter does not absolve the brand Patagonia. We were inspired to do this research after  
7 hearing the words of Patagonia brand communications director [Corley Kenna in an interview with 'Your Public Value'](#) where she mentions -  
8 "the consumers are there to hold you responsible to think beyond profit." Consumers have yet to hold the brand Patagonia responsible for  
9 NOT thinking beyond profit with the creation of Broken Arrow which supports the very people and institutions destroying the planet - the US  
10 military is, after all, the world's largest global polluter. It is a disconcerting fact for a company that claims to be "in business to save our home  
11 planet."

12 From here:

- 13 •
- 14 • We will not utilize any references to the brand Patagonia's font and logo.
- 15 •
- 16 •
- 17 • Our upcycled t-shirts/sweatshirts and clothing merch is a moot point as we
- 18 • have never and will never reference the brand Patagonia's logo or brand. Fonts we use have been one of a kind custom text or
- 19 • purchased Kilimanjaro font. Furthermore, our merch is made out of clothing saved from landfills and screen printed with new designs.
- 20 • However, per the brand Patagonia's consideration, and to make sure there is absolutely no brand association between Pattie Gonia
- 21 • and the brand Patagonia, we won't save any of the brand Patagonia's product we frequently find heading to landfills.
- 22 •

23 In summary: there's plenty of room for us to both play in this play box. We trust the brand Patagonia will stay on their side and we will stay  
24 on ours. There are far more benefits to the brand Patagonia if our relationship remains neutral.

25 Lastly, we understand positionality here and know you're doing your job, likely reaching out at the request of senior leadership which you're  
26 more than welcome to share with them. You communicated with kindness and grace and that is appreciated.

27 Phew, are you a bit tired? We are too! So, kicking work aside, if you or your family would ever like tickets to a Pattie Gonia show or some  
28 merch, we're happy to make that happen. Just say the word!

Pattie and Jenny

20 *March 12, 2025 Email from Patagonia:*

22 Hi Pattie and Jenny,

23 Apologies this has taken some time to respond. I agree with you that we all benefit if our relationship remains at least neutral. Recognizing that my  
24 legal lens has its limits, I'm adding Jonathan Carmona and Corley Kenna to the conversation since Whitney is no longer at the company. Jonathan is our  
25 Director of Global Justice and Belonging. Corley is our Chief Impact & Communications Officer who you quoted in your note. Hopefully, among this  
26 group we can find a productive way forward.

27 We are genuinely interested in at least having a neutral relationship, in particular at a moment when the threats to public lands are so acute. And we are  
28 happy to discuss Patagonia's government business that was discontinued three years ago. If you think there are valid criticisms of the company about  
that business, then by all means share that with your community.

We do, however, seem to have different understandings of where we left things related to Patagonia's trademarks when this last came up. Is there a time  
next week that you'd be available to talk with us to see if we can find a way forward?

1           29. While Pattie Gonia’s response stated that “clothing merch is a moot  
2 point,” Pattie Gonia has restocked the Pattie Gonia Products at the  
3 pattiegoniamerch.com e-commerce store and has released additional products and  
4 PATTIE GONIA-branded content. Pattie Gonia also began using the PATTIE  
5 GONIA brand to promote a tour of theaters and arenas. Pattie Gonia continues to  
6 use and display Patagonia’s logos.

7           30. Defendant Entrepreneur Enterprises, dba Pattie Gonia Productions  
8 formally confirmed the intention to commercialize the PATTIE GONIA brand,  
9 contrary to the parties’ 2022 understanding, by filing an application, Serial Number  
10 99/404,728, to register PATTIE GONIA as a trademark for a wide array of goods  
11 and services, many of which already are provided by Patagonia.

12           31. Contradicting Pattie Gonia’s representation that she “will not utilize  
13 any references to the brand Patagonia’s font and logo,” Pattie Gonia celebrated a  
14 milestone number of Instagram followers on October 5, 2025, by displaying the  
15 copycat PATTIE GONIA logo on gloves, replicating Patagonia’s famous P-6 logo:



1 32. On November 22, 2025, Pattie Gonia attended an event hosted by *Out*  
2 *Magazine*. At this event, Pattie Gonia wore an outfit made from the Transgender  
3 Pride Flag featuring a replica of Patagonia’s famous P-6 logo with the PATTIE  
4 GONIA trademark:



18 33. In a Ted Talk address, Pattie Gonia exclaimed that many members of  
19 the audience were wearing “my merch.” She then proceeded to announce that  
20 “Patagonia vests are indeed very TED drag.”



1 34. The PATTIE GONIA trademark is nearly identical to the  
2 PATAGONIA word mark. The logo on which Pattie Gonia has displayed the  
3 PATTIE GONIA trademark is nearly identical to Patagonia's P-6 logo. The full  
4 range of Defendants' Pattie Gonia Products includes products and services that are  
5 identical to and compete directly with Patagonia's products and services.

6 35. Pattie Gonia's use of the PATTIE GONIA trademark and promotion  
7 and sale of the Pattie Gonia Products already has caused confusion and will cause a  
8 likelihood of additional confusion among consumers regarding the source of Pattie  
9 Gonia's products, or whether Patagonia has sponsored, licensed, authorized, or is  
10 somehow affiliated with Pattie Gonia.

11 36. Pattie Gonia began using the PATTIE GONIA trademark long after the  
12 PATAGONIA trademarks became famous. The PATTIE GONIA trademark and  
13 Pattie Gonia Products are likely to dilute Patagonia's famous and distinctive marks  
14 by diminishing their distinctiveness and singular association with Patagonia.  
15 Patagonia has no alternative but to protect its goodwill and famous trademark by  
16 obtaining an injunction against Pattie Gonia's further use of the PATTIE GONIA  
17 trademark and related designs.

18 37. Pattie Gonia's transformation into a commercial enterprise is not the  
19 first that Patagonia has had to stop in order to protect its brand. These range from  
20 parties who, for example, have misused Patagonia's goodwill to sell products or  
21 services under FRATAGONIA, CATAGONIA, and PETAGONIA designations to  
22 others offering PETROGONIA, and GATAGONIA merchandise. Protection of  
23 Patagonia's brand requires action whether the brand or logo has been  
24 misappropriated by supporters of the oil industry, para-military organizations, or  
25 supporters of Patagonia's own core initiatives. Just a few examples are shown  
26 below of others' similar infringements that, if unabated, would cause the same kind  
27 of harm to Patagonia's brand as Pattie Gonia's enterprise:

28 //

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



38. Given Pattie Gonia's failure to follow through on the limitations the parties had discussed, working instead to develop and own trademarks for a PATTIE GONIA enterprise, Patagonia believes that Pattie Gonia will not stop compromising Patagonia's famous brand unless Defendants are restrained by the Court.

39. While Patagonia seeks only nominal monetary damages, the harm Pattie Gonia has caused and will cause to the PATAGONIA brand is irreparable and cannot be remedied by money damages or other remedies short of an injunction. Unless Pattie Gonia is restrained by the Court, Pattie Gonia will continue expanding

1 and causing harms by, among other things:

2 a. Depriving Patagonia of control over how and to what purpose its  
3 trademark is used;

4 b. Confusing and deceiving consumers about who is producing,  
5 sponsoring, or authoring the Pattie Gonia Products;

6 c. Causing the public to falsely associate Patagonia with Pattie  
7 Gonia and/or the Pattie Gonia Products;

8 d. Causing the public falsely to believe Patagonia has collaborated  
9 with Pattie Gonia or about the Pattie Gonia Products;

10 e. Irreparably harming Patagonia's goodwill and compromising the  
11 capacity of Patagonia's famous PATAGONIA trademarks to differentiate its products  
12 from those that others have created;

13 f. Irreparably harming Patagonia's licensing and collaboration  
14 programs, and its ability to control its brand partnerships and associate itself  
15 with selected partners who are specifically aligned to Patagonia's company  
16 mission; and

17 40. For all these reasons, Patagonia is entitled to injunctive relief against  
18 Pattie Gonia and to an order directing the USPTO to refuse registration of the  
19 PATTIE GONIA trademark, in all classes covered by Serial Number 99/404,728.

20 **FIRST CLAIM**

21 **FEDERAL TRADEMARK INFRINGEMENT**

22 **(15 U.S.C. §§ 1114-1117)**

23 41. Patagonia realleges and incorporates by reference each of the  
24 allegations contained in paragraphs 1 through 40 of this Complaint.

25 42. Pattie Gonia has used, in connection with the sale, offering for sale,  
26 distribution, or advertising of its products bearing the PATTIE GONIA trademark,  
27 words and symbols that infringe upon Patagonia's PATAGONIA trademarks. Pattie  
28 Gonia also has applied for a trademark registration that, if the registration were

1 allowed, would involve use of the PATTIE GONIA trademark on goods and  
2 services that would infringe Patagonia's rights in its registered marks.

3 43. These acts of trademark infringement are likely to cause confusion,  
4 mistake, or deception, and are in violation of 15 U.S.C. § 1114.

5 44. As a direct and proximate result of Pattie Gonia's conduct, Patagonia is  
6 entitled to recover nominal damages in the amount of one dollar (\$1.00) and an  
7 award of attorneys' fees under 15 U.S.C. § 1117(a).

8 45. Patagonia is entitled to injunctive relief pursuant to 15 U.S.C. § 1116(a)  
9 that requires Pattie Gonia to stop (i) use of the PATTIE GONIA trademark and any  
10 other mark or design similar to the PATAGONIA trademarks, (ii) any further action  
11 in pursuit of Defendants' trademark application, and (iii) to a directive to the  
12 USPTO that the application must be refused.

13 **SECOND CLAIM**

14 **FEDERAL UNFAIR COMPETITION**

15 **(False Designation of Origin and False Description – 15 U.S.C. § 1125(a))**

16 46. Patagonia realleges and incorporates by reference each of the  
17 allegations contained in paragraphs 1 through 45 of this Complaint.

18 47. Pattie Gonia's conduct as alleged in this Complaint constitutes the use  
19 of symbols or devices tending falsely to describe the Pattie Gonia Products, within  
20 the meaning of 15 U.S.C. § 1125(a)(1). Pattie Gonia's conduct is likely to cause  
21 confusion, mistake, or deception by or in the public as to the affiliation, connection,  
22 association, origin, sponsorship, or approval of the Pattie Gonia Products to the  
23 detriment of Patagonia and in violation of 15 U.S.C. § 1125(a)(1). Pattie Gonia also  
24 has applied for a trademark registration that, if the registration were allowed, would  
25 involve use of the PATTIE GONIA trademark on goods and services in a manner  
26 that would likely cause relevant consumer confusion about the source of Pattie  
27 Gonia's goods or an association or affiliation between Patagonia and Pattie Gonia.

28 48. As a direct and proximate result of Pattie Gonia's conduct, Patagonia is

1 entitled to recover nominal damages of one dollar (\$1.00), and an award of  
2 attorneys' fees under 15 U.S.C. § 1117(a).

3 49. Patagonia is entitled to injunctive relief pursuant to 15 U.S.C. § 1116(a)  
4 that requires Pattie Gonia to stop (i) use of the PATTIE GONIA trademark and any  
5 other mark or design similar to the PATAGONIA trademarks, (ii) any further action  
6 in pursuit of Defendants' trademark application, and (iii) to a directive to the  
7 USPTO that the application must be refused.

8 **THIRD CLAIM**

9 **FEDERAL DILUTION OF FAMOUS MARK**

10 **(Trademark Dilution Revision Act of 2006, 15 U.S.C. § 1125(c))**

11 50. Patagonia realleges and incorporates by reference each of the  
12 allegations contained in paragraphs 1 through 49 of this Complaint.

13 51. Patagonia's PATAGONIA trademark is distinctive and famous within  
14 the meaning of the Trademark Dilution Revision Act of 2006, 15 U.S.C. § 1125(c),  
15 and was famous prior to Pattie Gonia's adoption of the nearly identical PATTIE  
16 GONIA trademark.

17 52. Pattie Gonia's conduct and trademark application is likely to dilute  
18 Patagonia's PATAGONIA trademark by diminishing its distinctiveness in violation  
19 of the Trademark Dilution Revision Act of 2006, 15 U.S.C. § 1125(c).

20 53. As a direct and proximate result of Pattie Gonia's conduct, Patagonia  
21 is entitled to recover nominal damages of one dollar (\$1.00), and an award of  
22 attorney's fees under 15 U.S.C. §§ 1116(a), 1117(a), and 1125(c).

23 54. Patagonia is entitled under 15 U.S.C. §§ 1116(a) and 1125(c) to an  
24 injunction that requires Pattie Gonia to stop (i) use of the PATTIE GONIA  
25 trademark and any other mark or design similar to the PATAGONIA trademarks,  
26 (ii) any further action in pursuit of Defendants' trademark application, and (iii) to a  
27 directive to the USPTO that the application must be refused.

28

1 **FOURTH CLAIM**

2 **TRADEMARK INFRINGEMENT AND UNFAIR COMPETITION**

3 **UNDER CALIFORNIA STATUTORY LAW**

4 **(Cal. Bus. & Prof. Code §§ 14200 *et seq.*;**

5 **Cal. Bus. & Prof. Code §§ 17200 *et seq.*)**

6 55. Patagonia realleges and incorporates by reference each of the  
7 allegations contained in paragraphs 1 through 54 of this Complaint.

8 56. Patagonia is the owner of numerous registrations for the PATAGONIA  
9 trademarks, as well as common law rights in those marks.

10 57. Pattie Gonia is using and has applied to register a trademark that  
11 infringes upon Patagonia's PATAGONIA trademarks without the consent of  
12 Patagonia and in connection with the sale, offering for sale, distribution, or  
13 advertising of the Pattie Gonia Products.

14 58. Pattie Gonia's infringement of Patagonia's PATAGONIA trademarks is  
15 likely to cause confusion, mistake, and deception as to the source of the origin of  
16 Pattie Gonia's offerings.

17 59. Pattie Gonia uses the PATTIE GONIA trademark to enhance the  
18 commercial value of Pattie Gonia's offerings.

19 60. Pattie Gonia's acts violate Patagonia's trademark rights under  
20 California Business & Professions Code §§14245 *et seq.*

21 61. Pattie Gonia's conduct as alleged in this Complaint also constitutes  
22 "unlawful, unfair or fraudulent business act[s] or practice[s] and unfair, deceptive,  
23 untrue or misleading advertising" within the meaning of California Business &  
24 Professions Code §§ 17200 *et seq.*

25 62. Patagonia is entitled to nominal monetary damages of one dollar  
26 (\$1.00) and an injunction requiring Pattie Gonia to stop (i) use of the PATTIE  
27 GONIA trademark and any other mark or design similar to the PATAGONIA  
28 trademarks, (ii) any further action in pursuit of Defendants' trademark application,

1 and (iii) to a directive to the USPTO that the application must be refused.

2 63. Without injunctive relief, Patagonia has no means by which to control  
3 the continuing injury to its reputation and goodwill or that of its PATAGONIA  
4 trademarks. Patagonia has been and will continue to be irreparably harmed. No  
5 amount of money damages can adequately compensate Patagonia if it loses the  
6 ability to control its marks.

7 **FIFTH CLAIM**

8 **TRADEMARK DILUTION UNDER CALIFORNIA LAW**

9 **(Cal. Bus. & Prof. Code § 14247)**

10 64. Patagonia realleges and incorporates by reference each of the  
11 allegations contained in paragraphs 1 through 63 of this Complaint.

12 65. Patagonia owns valid and protectable rights in its PATAGONIA  
13 trademarks.

14 66. The PATAGONIA trademarks – registered marks in the state of  
15 California – are distinctive and famous within the meaning of the California Model  
16 State Trademark Law, Cal. Bus. & Prof. Code § 14247, in that they are household  
17 brands in California, and were famous prior to Pattie Gonia’s adoption of the  
18 PATTIE GONIA trademark.

19 67. Pattie Gonia’s acts and trademark application are likely to dilute the  
20 distinctive quality of the PATAGONIA trademarks. Pattie Gonia’s acts therefore  
21 constitute trademark dilution under California Business & Professions Code  
22 § 14247, the analogous statutes of other states, and under California common law.

23 68. Patagonia is entitled to nominal monetary damages and of one dollar  
24 (\$1.00) and an injunction requiring Pattie Gonia to stop (i) use of the PATTIE  
25 GONIA trademark and any other mark or design similar to the PATAGONIA  
26 trademarks, (ii) any further action in pursuit of Defendants’ trademark application,  
27 and (iii) to a directive to the USPTO that the application must be refused.

28 69. Without injunctive relief, Patagonia has no means by which to control

1 the continuing dilution of the PATAGONIA trademarks. Patagonia has been and  
2 will continue to be irreparably harmed. No amount of money damages can  
3 adequately compensate Patagonia for such harm.

4 **SIXTH CLAIM**

5 **TRADEMARK INFRINGEMENT UNDER CALIFORNIA COMMON LAW**

6 70. Patagonia realleges and incorporates by reference each of the  
7 allegations contained in paragraphs 1 through 69 of this Complaint.

8 71. Patagonia owns valid and protectable rights in its PATAGONIA  
9 trademarks at common law.

10 72. Pattie Gonia's conduct is likely to cause confusion, to cause mistake, or  
11 to deceive as to the source of goods offered by Pattie Gonia, or as to affiliation,  
12 connection, association, sponsorship, or approval of such goods and services, and  
13 constitutes infringement of Patagonia's PATAGONIA trademarks at common law.

14 73. Pattie Gonia infringed Patagonia's PATAGONIA trademarks with  
15 knowledge and intent to cause confusion, mistake, or deception.

16 74. Unless restrained and enjoined, the conduct of Pattie Gonia will further  
17 impair the value of the PATAGONIA trademarks and Patagonia's business  
18 reputation and goodwill. Patagonia has no adequate remedy at law.

19 75. Patagonia is entitled to nominal monetary damages of one dollar  
20 (\$1.00) and an injunction (i) requiring Pattie Gonia to stop using PATTIE GONIA  
21 as a trademark and any other mark or design similar to the PATAGONIA  
22 trademarks, (ii) requiring Pattie Gonia to refrain from any further action in pursuit of  
23 Defendants' trademark application, and (iii) directing the USPTO that the trademark  
24 application must be refused.

25 76. Without injunctive relief, Patagonia has no means by which to control  
26 the continuing injury to its reputation and goodwill or that of its PATAGONIA  
27 trademarks. Patagonia has been and will continue to be irreparably harmed. No  
28 amount of money damages can adequately compensate Patagonia if it loses the

1 ability to control its marks.

2 **PRAYER FOR JUDGMENT**

3 WHEREFORE, Patagonia prays that this Court grant it the following relief:

4 1. Adjudge that Defendants have infringed the PATAGONIA trademarks  
5 in violation of Patagonia’s rights under 15 U.S.C. § 1114;

6 2. Adjudge that Defendants have infringed the PATAGONIA trademarks  
7 in violation of California statutory law;

8 3. Adjudge that Defendants have infringed Patagonia’s common law  
9 rights in the PATAGONIA trademarks;

10 4. Adjudge that, if Defendants’ trademark application were allowed to  
11 register, the goods and services Pattie Gonia sells under the mark infringe  
12 Patagonia’s statutory and common law trademark rights;

13 5. Adjudge that Defendants have competed unfairly with Patagonia in  
14 violation of Patagonia’s rights under 15 U.S.C. § 1125(a);

15 6. Adjudge that Defendants have competed unfairly with Patagonia in  
16 violation of California statutory law;

17 7. Adjudge that Defendants’ activities and trademark application, if  
18 registered, are likely to dilute Patagonia’s famous PATAGONIA trademarks in  
19 violation of Patagonia’s rights under 15 U.S.C. § 1125(c) and/or California law;

20 8. Adjudge that Defendants and their agents, employees, attorneys,  
21 successors, assigns, affiliates, and joint venturers, and any person(s) in active  
22 concert or participation with them, and/or any person(s) acting for, with, by, through  
23 or under them, be enjoined and restrained at first during the pendency of this action  
24 and thereafter permanently from:

25 a. Manufacturing, producing, sourcing, importing, selling, offering  
26 for sale, distributing, advertising, or promoting any goods or services that display  
27 any words or symbols that so resemble the PATAGONIA trademarks as to be likely  
28 to cause confusion, mistake, or deception, on or in connection with any product that

1 is not authorized by or for Patagonia, including, without limitation, any product or  
2 service that bears the PATTIE GONIA trademark, or any other approximation of  
3 Patagonia's trademarks;

4 b. Using any word, term, name, symbol, device, or combination  
5 that causes or is likely to cause confusion, mistake, or deception as to the affiliation  
6 or association of Defendants or their offerings with Patagonia, or as to the origin of  
7 Defendants' offerings, or any false designation of origin, false or misleading  
8 description or representation of fact, or any false or misleading advertising, or likely  
9 dilution of the PATAGONIA trademark;

10 c. Further infringing the rights of Patagonia in and to its  
11 PATAGONIA trademarks, or otherwise damaging Patagonia's goodwill or business  
12 reputation;

13 d. Further diluting the famous PATAGONIA trademarks;

14 e. Otherwise competing unfairly with Patagonia in any manner; and

15 f. Continuing to perform in any manner whatsoever any of the  
16 other acts complained of in this Complaint;

17 9. Order that registration of Application Serial Number 99/404,728 must  
18 be refused, and/or that any registration resulting from the application must be  
19 cancelled, and address its certified order to the USPTO, Office of the Solicitor, Mail  
20 Stop 8, Director of the USPTO, P.O. Box 1450, Alexandria, Virginia 22313;

21 10. Adjudge that Defendants are prohibited from applying to register any  
22 trademark or service mark which is likely to be confused with, or that dilutes the  
23 distinctive quality of, Patagonia's PATAGONIA trademarks;

24 11. Adjudge that Defendants be required immediately to deliver to  
25 Patagonia's counsel their inventory of infringing products, including without  
26 limitation, patches and any other products, packaging, labeling, advertising and  
27 promotional material, that are in their possession or subject to their control and that  
28 infringe Patagonia's trademarks as alleged in this Complaint;

1           12. Adjudge that Defendants, within thirty (30) days after service of the  
2 Court’s judgment, be required to file with this Court and serve upon Patagonia’s  
3 counsel a written report under oath setting forth in detail how Defendants have  
4 complied with the judgment and injunction;

5           13. Adjudge that Patagonia recover from Defendants nominal damages in  
6 the amount of one dollar (\$1.00);

7           14. Adjudge that Patagonia be awarded its costs and disbursements  
8 incurred in connection with this action, including Patagonia’s reasonable attorneys’  
9 fees and investigative expenses; and

10           15. Adjudge that all such other relief be awarded to Patagonia as this Court  
11 deems just and proper.

12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: January 21, 2026

Respectfully submitted,

VERSO LAW GROUP LLP

By: /s/ Gregory S. Gilchrist

GREGORY S. GILCHRIST  
RYAN BRICKER  
SOPHY TABANDEH  
KOURTNEY SPEER

Attorneys for Plaintiff  
PATAGONIA, INC.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**DEMAND FOR JURY TRIAL**

Patagonia, Inc. demands that this action be tried to a jury.

DATED: January 21, 2026

Respectfully submitted,

VERSO LAW GROUP LLP

By: /s/ Gregory S. Gilchrist

GREGORY S. GILCHRIST

RYAN BRICKER

SOPHY TABANDEH

KOURTNEY SPEER

Attorneys for Plaintiff  
PATAGONIA, INC.