

FILED

THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

2010 OCT 27 PM 3:01

CLERK OF DISTRICT COURT
ALEXANDRIA, VIRGINIA

WALGREEN CO.,)
)
 Plaintiff,)
)
 v.)
)
 WEGMANS FOOD MARKETS, INC.,)
)
 Defendant.)
)
)

Civil Action No. 1:10CV1216
TSE/TCB

PLAINTIFF'S COMPLAINT

Plaintiff, Walgreen Co. ("Plaintiff"), hereby complains against Wegmans Food Markets, Inc. ("Defendant") and alleges as follows:

NATURE AND STATUTORY BASIS OF ACTION

1. This is an action for [I] infringement of U.S. Trademark Registration Nos. 3,073,995 and 3,850,791 under 15 U.S.C. § 1114; [II] infringement of U.S. Trademark Registration No. 3,303,249 under 15 U.S.C. § 1114; [III] unfair competition/false designation of origin in connection with the mark covered in U.S. Trademark Registration Nos. 3,073,995 and 3,850,791 under 15 U.S.C. § 1125; [IV] unfair competition/false designation of origin under 15 § 1125 in connection with the mark covered in U.S. Trademark Registration No. 3,303,249; [V] trade dress infringement under Title 15, United States Code § 1125; [VI] dilution of Plaintiff's distinctive marks under 15 U.S.C. § 1125(c); and [VII] unfair competition under the common law.

THE PARTIES

2. Plaintiff, Walgreen Co. (“Walgreens” or “Plaintiff”) is an Illinois corporation with its principal place of business in Deerfield, Illinois.

3. On information and belief, Defendant, Wegmans Food Markets, Inc., (“Defendant” or “Wegmans”), is a New York corporation having a place of business located at 1500 Brooks Avenue, P.O. Box 30844, Rochester, NY 14603.

JURISDICTION AND VENUE

4. Jurisdiction over Counts I-VII is expressly conferred on this Court under 15 U.S.C. § 1121 and/or 28 U.S.C. §§ 1331 and 1338. The Court also has supplemental jurisdiction over the common law claim pursuant to 28 U.S.C. § 1367.

5. Personal jurisdiction over Defendant is proper as Defendant does business in the State of Virginia and within this District through its operation of retail stores located in this District, and/or Defendant has purposefully availed itself of the laws of this forum.

6. Venue is proper in the United States District Court for the Eastern District of Virginia pursuant to 28 U.S.C. § 1391. Upon information and belief, at all times material to this Complaint, Defendant has committed one or more of the acts complained of herein within the United States and this District, and caused injury within this State and District, and Defendant resides in this District pursuant to 28 U.S.C. § 1391(c).

BACKGROUND

7. For more than 100 years, Plaintiff has operated drug stores carrying a selection of general merchandise under the “Walgreens” name. In 1951, Plaintiff began utilizing the WALGREENS name in a SCRIPT LOGO (“WALGREENS Script Logo,” shown in **Exhibit A**), and adopted a stylized W Logo, designated as its “Flying W Logo,” (shown in **Exhibit A**), to promote its drug store services and the wide variety of general consumer merchandise products

sold in its stores. Plaintiff has continuously used its WALGREENS Script Logo and its Flying W Logo as trademarks since their introduction.

8. Today, Plaintiff is a *Fortune* 500 corporation, that continues to operate drug stores and pharmacies selling, among other things, prescription medications, cosmetics, toiletries, household items, food items and other consumables, beverages, greeting cards and gift wrap, alcoholic beverages and photofinishing services. Plaintiff has more than 7,500 stores located in this District and throughout the fifty States.

9. Plaintiff is the owner of U.S. Trademark Registration No. 3,303,249 (“’249”), registered October 2, 2007, for Plaintiff’s distinctive WALGREENS Script Logo mark for *retail pharmacy, retail drug store, and general merchandise store services*. A true and accurate copy of this Registration is attached as **Exhibit B**.

10. Plaintiff is the owner of U.S. Trademark Registration No. 3,073,995 (“’995”), registered March 28, 2006, for Plaintiff’s distinctive Flying W Logo mark for *retail drug store and general merchandise store services*, and U.S. Trademark Registration No. 3,850,791 (“’791”), registered September 21, 2010, also for Plaintiff’s distinctive Flying W Logo mark for a wide variety of *personal care, household, and snack food products*. A true and accurate copy of each Registration is attached as **Exhibits C and D**, respectively.

11. The Registrations of the foregoing trademarks are in full force and effect on the Principal Trademark Register and constitute *prima facie* evidence of the validity and registration of the ‘249, ‘995, and ‘791 marks and of Plaintiff’s ownership of the ‘249, ‘995, and ‘791 trademarks and of Plaintiff’s exclusive right to use the ‘249, ‘995, and ‘791 trademarks in commerce for a variety of services and products as provided in 15 U.S.C. § 1057.

12. Since at least 1951, Plaintiff has used the WALGREENS Script Logo in

connection with its retail store services including pharmacy, retail drug store and general consumer merchandise store services.

13. Since at least 1951, Plaintiff has used the Flying W Logo in connection with its retail store services including pharmacy, retail drug store and general consumer merchandise store services.

14. As a result of Walgreens' extensive use and promotion of the WALGREENS Script Logo and Flying W Logo marks ("Walgreens Marks") in Virginia and elsewhere, Plaintiff has acquired valuable common law rights in the Walgreens Marks.

15. Plaintiff worked with Watt International, Inc., a design firm located in Toronto, to update the Flying W Logo to include a white Flying W on a red background encircled by a silver or gray band, i.e., the Encircled Flying W trade dress. See **Exhibit E**. The Encircled Flying W trade dress has been utilized as trade dress for various products, including, but not limited to, candy and other food products, personal care products, and household products. See **Exhibit F**.

16. Plaintiff's Encircled Flying W Logo trade dress is unique, arbitrary, and not functional. Alternatively, to the extent it is not considered to be inherently distinctive, Plaintiff has promoted its distinctive Encircled Flying W trade dress such that it has acquired secondary meaning.

17. On information and belief, Defendant is a grocery store chain having stores in New York, Pennsylvania, New Jersey, Virginia, and Maryland. In addition to selling food products, produce, general consumer merchandise, toiletries, and alcohol products, Defendant's stores also contain pharmacies.

18. On information and belief, in late 2008 Defendant introduced the name of its stores in a new Script Logo ("WEGMANS Script Logo" shown in **Exhibit A**) incorporating a

Stylized W Logo (**Exhibit A**) that is similar to Plaintiff's Flying W Logo, an open lower case "g" and ending in the lower case script letters "ns," and has begun using its WEGMANS Script Logo in connection with its retail grocery store services, including pharmacy services and general consumer merchandise retail services, and on packaging for a wide variety of products, including, but not limited to: food products, produce, beverages, laundry supplies, toilet paper, diapers, reclosable plastic bags, and trash bags.

19. On May 13, 2010 Defendant filed a trademark application, Serial No. 85/037,348, with the U.S. Patent and Trademark Office to register the WEGMANS Script Logo for *retail grocery stores; and retail stores featuring alcoholic beverages* claiming first use in December 2008. See **Exhibit G**.

20. On information and belief, Defendant similarly worked with Watt International, Inc. to design a new logo consisting of a Stylized W Logo (shown in **Exhibit A**) in white on a contrasting background and encircled by a shaded silver or gray band, i.e., Encircled W trade dress. See **Exhibit E**. The new Encircled W trade dress, including the Stylized W Logo, appears on packaging for soft drinks including, 12-ounce cans, cartons, and sixteen ounce and two-liter bottles of carbonated soft drinks. It also appears on point of purchase displays and on shelf signage. See **Exhibit E**.

21. Defendant's infringing and unfair activities are detrimental to the good will and business reputation symbolized by the WALGREENS Script Logo and the Flying W Logo trademarks, and the Encircled Flying W trade dress. Defendant's foregoing conduct infringes and dilutes Plaintiff's trademarks and trade dress resulting in irreparable harm to Plaintiff.

22. On information and belief, Defendant was aware of Plaintiff's proprietary rights in the WALGREENS Script Logo, the Flying W Logo and the Encircled Flying W trade dress

prior to the marketing and sale of Defendant's products and services under the WEGMANS Script Logo and Stylized W Logo, and Encircled W trade dress, and Defendant's actions were taken willfully.

COUNT I

TRADEMARK INFRINGEMENT

23. As a complete and first ground for relief, Plaintiff realleges paragraphs 1-22 above and hereby charges Defendant with infringement of the Flying W Logo mark and '995 and '791 Registrations under 15 U.S.C. § 1114.

24. Notwithstanding Plaintiff's well known and prior-established rights in its stylized Flying W Logo trademark, and without the authorization of Plaintiff, Defendant adopted, offered for sale, and/or sold, in United States commerce, certain products including soft drinks, in packaging bearing a Stylized W Logo, which is confusingly similar to the Flying W Logo trademarks shown in Plaintiff's '995 and '791 Registrations.

25. Defendant's adoption and use of a Stylized W Logo in connection with soft drinks sold in commerce, without authorization by Plaintiff, will likely cause confusion, mistake, and/or deception as to an affiliation, connection and/or association with Plaintiff and its registered Flying W Logo (see **Exhibit E**), or as to the origin, sponsorship or approval of Defendant's products by Plaintiff, in violation of 15 U.S.C. § 1114.

26. Defendant's infringement of the '995 and '791 Registrations is detrimental to Plaintiff's goodwill and business reputation symbolized by the registered Flying W Logo trademark. All of the foregoing conduct by Defendant infringes the registered Flying W Logo trademark and causes irreparable harm to Plaintiff.

27. On information and belief, Defendant's acts alleged herein were committed willfully and with knowledge that such unauthorized trademark use would cause confusion, or

cause mistake, or deceive purchasers to believe that Plaintiff sponsored, endorsed, or authorized Defendant's food, personal care, and household products, or that Defendant's products are associated with Plaintiff. Thus, a finding of an exceptional case within the meaning of 15 U.S.C. § 1117(a) is warranted.

COUNT II

TRADEMARK INFRINGEMENT

28. As a complete and second ground for relief, Plaintiff realleges paragraphs 1-27 above and hereby charges Defendant with infringement of the '249 Registration under 15 U.S.C. § 1114.

29. Notwithstanding Plaintiff's well known and prior-established rights in its WALGREENS Script Logo trademark, and without the authorization of Plaintiff, Defendant advertised and provided retail grocery store services in connection with pharmacy services and general consumer merchandise retail services under the WEGMANS Script Logo, and sold food products, personal care and household items bearing the WEGMANS Script Logo, in commerce. Defendant's WEGMANS Script Logo is confusingly similar to the WALGREENS Script Logo trademark shown in Plaintiff's '249 Registration.

30. Defendant's adoption and use of the WEGMANS Script Logo in connection with retail store and pharmacy services and general consumer merchandise retail services, and food products, personal care and household items in commerce, without authorization by Plaintiff, will likely cause confusion, mistake, and/or deception as to the affiliation, connection and/or association with Plaintiff and its registered WALGREENS Script Logo trademark, or as to the origin, sponsorship or approval of Defendant's goods and/or services by Plaintiff, in violation of 15 U.S.C. § 1114.

31. Defendant's infringement of the '249 Registration is detrimental to Plaintiff's goodwill and business reputation symbolized by the registered WALGREENS Script Logo trademark. All of the foregoing conduct by Defendant infringes Plaintiff's WALGREENS Script Logo trademark and causes irreparable harm to Plaintiff.

32. On information and belief, Defendant's acts alleged herein were committed willfully and with knowledge that such unauthorized trademark use would cause confusion, or cause mistake, or deceive purchasers to believe that Plaintiff sponsored, endorsed, or authorized Defendant's products and/or services, or that Defendant's products and/or services are associated with Plaintiff. Thus, a finding of an exceptional case within the meaning of 15 U.S.C. § 1117(a) is warranted.

COUNT III

FEDERAL UNFAIR COMPETITION

33. As a complete and third ground for relief, Plaintiff hereby charges Defendant with federal unfair competition and unlawful appropriation of Plaintiff's Flying W Logo under 15 U.S.C. § 1125(a), and realleges paragraphs 1-32 above.

34. Without the consent or authorization of Plaintiff, Defendant has advertised and provided services and sold products bearing a Stylized W Logo that is confusingly similar to Plaintiff's Flying W Logo.

35. Defendant's adoption and use of the Stylized W Logo, which is confusingly similar to Plaintiff's Flying W Logo trademark, in commerce without authorization by Plaintiff, will likely cause confusion, mistake, and/or deception as to the affiliation, connection, and/or association with Plaintiff, or as to origin, sponsorship, approval of Defendant's goods and/or services by Plaintiff, in violation of 15 U.S.C. § 1125(a).

36. Defendant's conduct has and will continue to injure Plaintiff and diminish and

destroy Plaintiff's goodwill in its Flying W Logo trademark. The foregoing conduct by Defendant infringes the stylized Flying W Logo trademark used by Plaintiff and causes Plaintiff irreparable harm.

37. Upon information and belief, Defendant's acts as alleged herein were committed willfully and with knowledge that such unauthorized use of the Stylized W Logo would cause confusion, mistake, or deceive purchasers to believe that Plaintiff sponsored, endorsed, or authorized Defendant's products and services, or that Defendant's products and/or services are associated with Plaintiff. Thus, a finding of an exceptional case is warranted under 15 U.S.C. § 1117(a).

COUNT IV

FEDERAL UNFAIR COMPETITION

38. As a complete and fourth ground for relief, Plaintiff realleges paragraphs 1-37 above and hereby charges Defendant with federal unfair competition and unlawful appropriation of Plaintiff's WALGREEN Script Logo under 15 U.S.C. § 1125(a).

39. Without the consent or authorization of Plaintiff, Defendant has advertised and sold products and services bearing the WEGMANS Script Logo which is confusingly similar to Plaintiff's WALGREENS Script Logo trademark.

40. Defendant's adoption and use of the WEGMANS Script Logo, which is confusingly similar to Plaintiff's WALGREENS Script Logo trademark, in commerce without authorization by Plaintiff, will likely cause confusion, mistake, and/or deception as to the affiliation, connection, and/or association with Plaintiff, or as to origin, sponsorship, approval of Defendant's goods and/or services by Plaintiff, in violation of 15 U.S.C. § 1125(a).

41. Defendant's conduct has and will continue to injure Plaintiff and diminish and

destroy Plaintiff's goodwill in its WALGREENS Script Logo trademark. The foregoing conduct by Defendant infringes the WALGREENS Script Logo trademark used by Plaintiff and causes Plaintiff irreparable harm.

42. Upon information and belief, Defendant's acts as alleged herein were committed willfully and with knowledge that such unauthorized use of the stylized script would cause confusion, mistake, or deceive purchasers to believe that Plaintiff sponsored, endorsed, or authorized Defendant's products and services, or that Defendant's products and/or services are associated with Plaintiff. Thus, a finding of an exceptional case is warranted under 15 U.S.C. § 1117(a).

COUNT V

TRADE DRESS INFRINGEMENT

43. As a complete and fifth ground for relief, Plaintiff realleges paragraphs 1-42 above and hereby charges Defendant with trade dress infringement under 15 U.S.C. § 1125(a), for unlawful appropriation of proprietary appearance features of Plaintiff's Encircled Flying W Logo trade dress.

44. The appearance of Plaintiff's Encircled Flying W Logo is unique, arbitrary, and non-functional and/or possesses secondary meaning, and is, therefore, proprietary with Plaintiff.

45. Defendant has adopted, and is using in commerce in connection with the promotion and sale of soft drink beverages, an Encircled W trade dress having the overall distinctive trade dress owned by Plaintiff.

46. Defendant's adoption and use in commerce of Plaintiff's proprietary Encircled W trade dress without authorization of Plaintiff constitutes an unlawful appropriation, copying and simulation of Plaintiff's trade dress and will likely cause confusion, mistake, or deception as to

the affiliation, connection or association of Defendant with Plaintiff, or as to the origin, sponsorship or approval of its goods by Plaintiff, in violation of 15 U.S.C. § 1125(a). Such conduct has and will continue to injure Plaintiff by direct diversion of sales to Defendant, and by diminishing and destroying Plaintiff's good will in its Encircled Flying W trade dress.

47. On information and belief, Defendant's adoption and use of the Encircled W trade dress is intentional and in flagrant disregard of Plaintiff's lawful rights, warranting a finding of an exceptional case within the meaning of 15 U.S.C. § 1117.

COUNT VI

DILUTION BY BLURRING

48. As a complete and sixth ground for relief, Plaintiff hereby charges Defendant with trademark dilution under 15 U.S.C. § 1125(c), and realleges Paragraphs 1-47 of this Complaint.

49. Plaintiff's WALGREENS Script Logo and Flying W Logo are inherently distinctive or have acquired distinctiveness.

50. As a result of Plaintiff's advertising, promotion and use of the registered WALGREENS Script Logo and Flying W Logo trademarks, shown in the '995, '791, and '249 Registrations, such trademarks have become famous.

51. Defendant's use of the WEGMANS Script Logo and Stylized W Logo, which are confusingly similar to Plaintiff's distinctive WALGREENS Script Logo and Flying W Logo trademarks in commerce, causes dilution of the distinctive qualities of the WALGREENS Script Logo and Flying W Logo marks.

52. Such unlawful and intentional use by Defendant began after Plaintiff's WALGREENS Script Logo and Flying W Logo trademarks became distinctive.

53. Unless Defendant's conduct is enjoined, it will dilute the distinctive quality of the WALGREENS Script Logo and Flying W Logo trademarks, and will inevitably destroy the

value of the marks and the goodwill associated therewith, which Plaintiff has spent considerable time, energy and money to develop, resulting in irreparable harm to Plaintiff.

54. On information and belief, Defendant's acts alleged herein were intentional and in flagrant disregard of Plaintiff's rights, warranting a finding of an exceptional case within the meaning of 15 U.S.C. § 1117.

COUNT VII

COMMON LAW UNFAIR COMPETITION

55. As a complete and seventh ground for relief, Plaintiff charges Defendants with unfair competition under the common law, and realleges Paragraphs 1-54 of this Complaint.

56. Defendant has operated a grocery store and provided pharmacy and general consumer merchandise retail services, and sold food, personal care, and household products utilizing a Stylized W Logo and the WEGMANS Script Logo, which are confusingly similar to Plaintiff's Flying W Logo and WALGREENS Script Logo, as shown in the '995, '791, and '249 Registrations, thereby causing a likelihood of confusion or of misunderstanding as to affiliation, connection or association with or certification by Plaintiff, has passed off its products and services as those of Plaintiff, and/or has engaged in other conduct which similarly creates a likelihood of confusion, or misunderstanding, or association.

57. The foregoing unfair competition of Defendant with respect to the advertising, offering for sale, and sale of food, personal care, and household products and operation of a grocery store, utilizing the Stylized W Logo and WEGMANS Script Logo, constitute unfair competition in violation of the common law, and are subject to the sanctions provided thereunder.

PRAYER FOR RELIEF

Plaintiff prays for the following relief:

1. Judgment confirming that Plaintiff's U.S. Trademark Registration No. 3,073,995 is valid, owned by Plaintiff and that Plaintiff has the exclusive right to use the trademark in commerce.

2. Judgment confirming that Plaintiff's U.S. Trademark Registration No. 3,850,791 is valid, owned by Plaintiff and that Plaintiff has the exclusive right to use the trademark in commerce.

3. Judgment confirming that Plaintiff's U.S. Trademark Registration No. 3,303,249 is valid, owned by Plaintiff and that Plaintiff has the exclusive right to use the trademark in commerce

4. Judgment that Defendant has infringed the Flying W Logo trademark and U.S. Trademark Registration No. 3,073,995.

5. Judgment that Defendant has infringed the Flying W Logo trademark and U.S. Trademark Registration No. 3,850,791.

6. Judgment that Defendant has infringed the WALGREENS Script Logo trademark and U.S. Trademark Registration No. 3,303,249.

7. Judgment that Defendant willfully infringed and intended to trade on the Flying W Logo trademark and U.S. Trademark Registration No. 3,073,995.

8. Judgment that Defendant willfully infringed and intended to trade on the Flying W Logo trademark and U.S. Trademark Registration No. 3,850,791.

9. Judgment that Defendant willfully infringed and intended to trade on the WALGREENS Script Logo trademark and U.S. Trademark Registration No. 3,303,249.

10. Judgment that Defendant has competed unfairly with Plaintiff by its adoption and use of a Stylized W Logo.

11. Judgment that Defendant has competed unfairly with Plaintiff by its adoption and use of the WEGMANS Script Logo.

12. Judgment confirming that the Encircled Flying W Logo trade dress is owned by Plaintiff, and that Plaintiff has the exclusive right to use the trade dress in commerce.

13. Judgment that Defendant has competed unfairly with Plaintiff, and has unlawfully and without authorization used and infringed Plaintiff's Encircled Flying W trade dress by use of a Encircled W trade dress that is confusingly similar to Plaintiff's Encircled Flying W trade dress.

14. Judgment that Defendant has diluted the distinctiveness of Plaintiff's Flying W Logo and WALGREENS Script Logo trademarks.

15. Judgment that Defendant and its officers, agents, servants, employees, attorneys and all persons in active concert and/or participation with it who receive notice be preliminarily and permanently enjoined and restrained from:

- a. Using any mark identical or confusingly similar to the Flying W Logo trademark shown in U.S. Trademark Registration Nos. 3,073,995 and 3,850,791, or any colorable imitations thereof in connection with the advertising, offering for sale and/or sale of Defendant's products and/or services;
- b. Using any mark identical or confusingly similar to the WALGREENS Script Logo trademark shown in U.S. Trademark Registration No. 3,303,249, or any colorable imitations thereof in connection with the advertising, offering for sale and/or sale of Defendant's products and/or services;

- c. Otherwise infringing the Flying W Logo trademark, or U.S. Trademark Registration Nos. 3,073,995 and 3,850,791, or the WALGREENS Script Logo trademark, or U.S. Trademark Registration No. 3,303,249;
- d. Using the WEGMANS Script Logo or the Stylized W Logo in any manner or any similar designations, or otherwise unfairly competing with Plaintiff;
- e. Diluting the distinctiveness of the WALGREENS Script Logo and/or the Flying W Logo trademarks;
- f. Causing any misunderstanding as to source, sponsorship, approval, or certification with or by Plaintiff or its products;
- g. Using any trade dress or design identical or confusingly similar to Plaintiff's trade dress, or any colorable imitations thereof; and,
- h. Otherwise infringing Plaintiff's trade dress.

16. Judgment that Defendant be directed to deliver up to this Court for destruction, pursuant to 15 U.S.C. § 1118, all labels, signs, packaging, prints, promotional materials, tapes, discs or other articles in its possession bearing the WEGMANS Script Logo, the Stylized W Logo, or the Encircled W trade dress, or exhibiting Plaintiff's trademarks or trade dress, or any reproduction, counterfeit, copy or colorable imitation thereof, and all websites, plates, molds, matrices, screens or other means of making or promoting the same.

17. That an accounting be held and Judgment rendered that Defendant is liable:
- a. For all profits received by Defendant on account of Defendant's infringement and unfair competition; and,

b. For actual damages sustained by Plaintiff on account of Defendant's infringement and unfair competition, and due to the flagrant and deliberate nature of such violations, that such damages be trebled and punitive damages be assessed.

18. Judgment that Defendant be directed to file in Court, and to serve on Plaintiff, within thirty (30) days after entry of the injunction, a report in writing, under oath, setting forth in detail the manner and form in which they have complied with the injunction.

19. A finding that this case is exceptional pursuant to 15 U.S.C. § 1117.

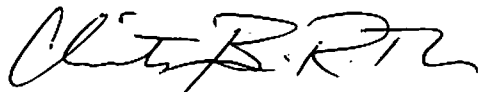
20. That this Court award attorneys' fees and taxable costs, and such other and further relief to Plaintiff as the Court deems just.

JURY DEMAND

Plaintiff requests a trial by jury.

Respectfully submitted,
WALGREEN CO.

Dated: October 27, 2010

By: 

Bradley C. Wright (VA Bar No. 37463)
bwright@bannerwitcoff.com
Christopher B. Roth (VA Bar No. 44499)
croth@bannerwitcoff.com
BANNER & WITCOFF, LTD.
1100 13th Street, N.W., Suite 1200
Washington, DC 20005
Telephone: (202) 824-3000
Facsimile: (202) 824-3001

Linda A. Kuczma
lkuczma@bannerwitcoff.com
Scott Burow
sburow@bannerwitcoff.com
BANNER & WITCOFF, LTD.
10 South Wacker Drive, Suite 3000
Chicago, Illinois 60606
Telephone: (312) 463-5000
Facsimile: (312) 463-5001

Attorneys for Plaintiff

THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

WALGREEN CO.,)
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 Plaintiff,)
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 v.) Civil Action No.
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 WEGMANS FOOD MARKETS, INC.,)
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 Defendant.)
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**INDEX OF EXHIBITS TO
COMPLAINT**

<u>Exhibit No.</u>	<u>Description</u>
A	WALGREENS Script Logo; Flyin W Logo (Walgreens); WEGMANS Script Logo; Stylized W Logo (Wegmans)
B	U.S. Trademark Registration No. 3,303,249
C	U.S. Trademark Registration No. 3,073,995
D	U.S. Trademark Registration No. 3,850,791
E	Encircled Flying W trade dress (Walgreens); Encircled W trade dress (Wegmans); Encircled W trade dress as used on Wegman's product
F	Encircled Flying W trade dress as used on Walgreen's product
G	TARR sheet for Wegman's Script Logo trademark application