

FILING GUIDE FOR TRADEMARK REGISTRATION IN THE USA

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About WCK

- Law firm focused on intellectual property law
- Office in Minneapolis, Minnesota
- 18 attorneys and 1 patent agent
- Founded in 1993
- Web: www.wck.com

About WCK (cont.)



About Austen Zuege

- Austen Zuege is an attorney at law licensed in the state of Minnesota in the USA. He practices in the areas of trademark prosecution, litigation, and client counseling. He handles trademark matters at the USPTO and the Trademark Trial and Appeal Board (TTAB).
- Austen is also a licensed U.S. patent attorney and handles domain name and cybersquatting matters.
- Over the years, Austen has also regularly written and spoken on a variety of IP-related topics.

LEGAL AUTHORITY

Background on Federal and State Legal Authorities for
Trademarks in the USA

Legal Basis for TMs in the USA

- Trademark (and service mark) legal rights based on use
 - *Goal: preventing consumer confusion by identifying single source of goods or services*
 - *Marks cannot be assigned apart from underlying “goodwill”*
- Federal law: Lanham Act – [15 U.S.C. § 1051](#) et seq.
 - *Federal registration (valid across all U.S. states)*
 - *Enforcement of registered and unregistered marks in federal courts*
 - *Also includes anti-cybersquatting provisions (ACPA) and false or misleading advertising provisions*
- [State Trademark and Unfair Competition Laws](#)
 - *Registration in [individual state\(s\)](#) only*
 - much less desirable than federal registration
 - no provisions for foreign priority
 - *Enforcement of registered and unregistered mark in individual state(s) – may be redundant with federal*

Federal Authority

- There is no explicit constitutional authorization for federal trademark protection in the USA
- Constitutional authority for federal trademark protections is derived from the Commerce Clause ([Art. 1, § 8, cl. 3](#))
 - *This is why U.S. federal trademarks have a **use in commerce** requirement (See [TMEP § 901 et seq.](#))*
 - *Commerce Clause pertains to **foreign and interstate commerce**, so trademark uses unconnected to interstate/foreign (or tribal) commerce fall to state law*

Lanham Act Citations

- It is common to refer to sections of the Lanham Act that were subsequently codified in Title 15 of the U.S. Code
 - *For example:*

§ 1 of the Lanham Act = 15 U.S.C. [§ 1051](#)

§ 43(a) of the Lanham Act = 15 U.S.C. [§ 1125\(a\)](#)

§ 44 of the Lanham Act = 15 U.S.C. [§ 1126](#)

- *See complete correspondence of sections [here](#)*

Federal Regulations and Examination Guidelines

- Regulations: [37 C.F.R. Chapter I, Parts 2, 3, 6, 7, and 11](#)
- USPTO Trademark Manual of Examining Procedure ([TMEP](#))

Foreign Applicants Must Have U.S. Counsel

- USPTO requires foreign applicants to be represented by an attorney licensed by a U.S. state, territory, etc.
 - <https://www.uspto.gov/trademarks/laws/trademark-rule-requires-foreign-applicants-and-registrants-have-us>
 - *Applies even for Madrid Protocol extensions*
 - *U.S. filing counsel must also complete [identity verification](#)*

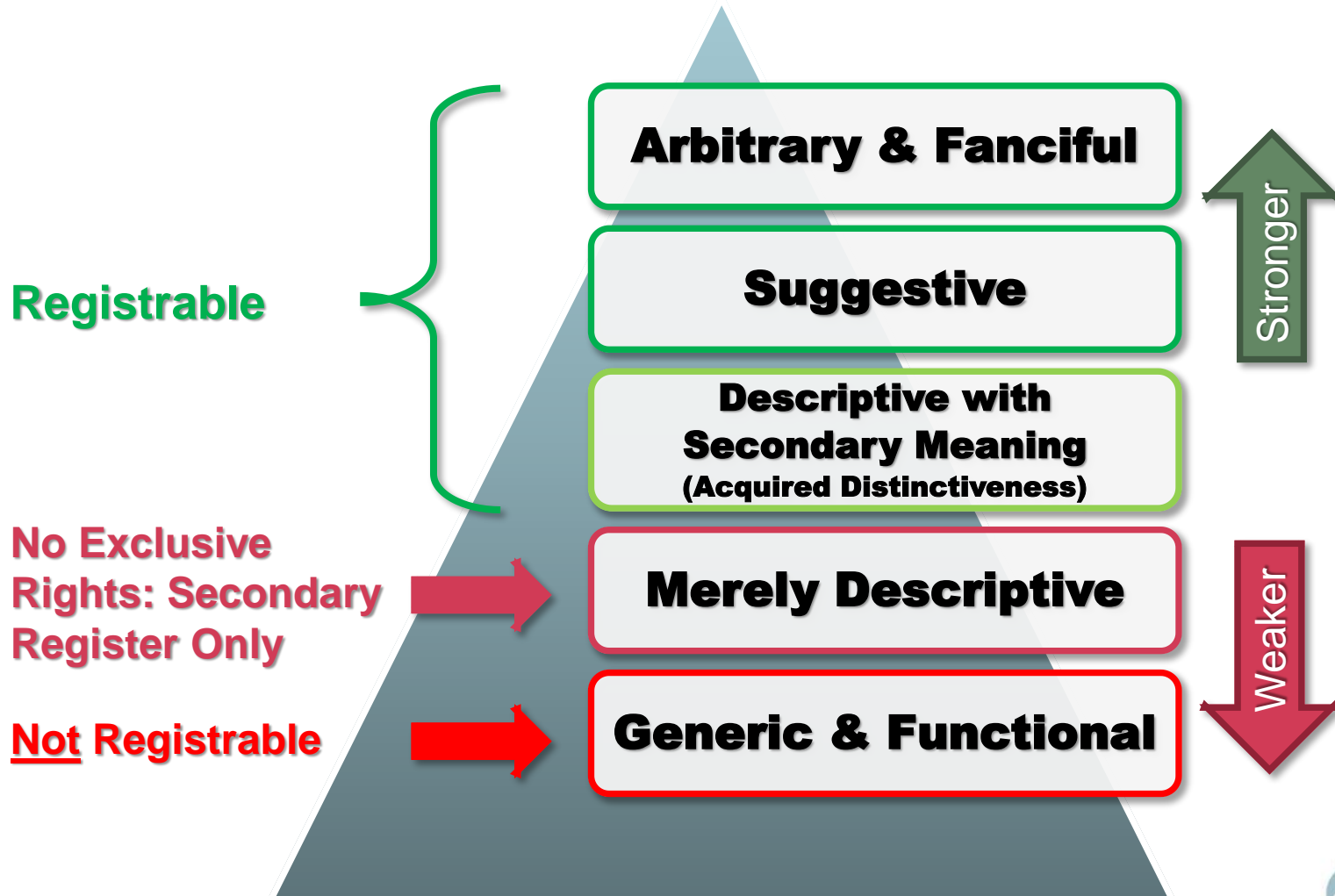
TYPES OF MARKS REGISTRABLE

Explanation of What Is Properly the Subject of a
U.S. Application for Registration

Things That Can Serve as Registrable Marks

- Common types of registrable marks:
 - *Word mark (standard characters; includes slogans)*
 - *Design mark (logo, “device” mark in other countries)*
 - *Composite mark (both design and words)*
- Less common types of registrable marks:
 - *Trade dress (nonfunctional product configuration, nonfunctional packaging shape/colors)*
 - *Certification mark*
 - *Collective mark (indicating membership in group)*
 - *Color, sound, scent, etc. – but difficult to register*

Strength of Marks



No Exclusive Rights: Secondary Register Only

Not Registrable

LIKELIHOOD OF CONFUSION

Overview of U.S. Legal Standard to Determine
If a Prior Mark Conflicts

Conflicting Marks

- The USPTO conducts a search for conflicting marks as part of the official examination of each application and may issue a likelihood of confusion refusal - [§ 2\(d\)](#)
 - *Only prior [registered](#) marks usually considered during initial examination, but unregistered [known marks](#) might be used*
- If a USPTO examining attorney concludes that a conflict exists between the applicant's mark and a prior mark, registration of the applicant's mark will be refused on the ground of a "likelihood of confusion", which is assessed based on the [du Pont](#) factors
- See <https://www.uspto.gov/trademarks/search/likelihood-confusion>

The *du Pont* Likelihood of Confusion Factors for Registration

- Two factors always considered:
 - *similarity or dissimilarity of the marks in their entireties as to appearance, sound, connotation, and commercial impression*
 - *relatedness of the goods or services as described in the application and prior application(s)/registration(s)*
- Additional factors may also be considered:
 - *similarity or dissimilarity of established, likely-to-continue trade channels (that is, actual sales methods used)*
 - *conditions under which and buyers to whom sales are made (for instance, "impulse" vs. careful, sophisticated purchasing)*
 - *number and nature of similar marks in use on similar goods*
 - *existence of a valid consent agreement between the applicant and the owner of the previously registered mark*

Likelihood of Confusion Factors in Litigation

- There are slightly [different enumerated factors](#) considered in each of the 13 different U.S. circuit (appellate) courts to assess likelihood of confusion during enforcement (for both registered and unregistered marks - §§ [32\(1\)](#) and [43\(a\)](#))
- But all likelihood of confusion standards end up being similar to the *du Pont* factors applied by the USPTO for registrability

Pre-Filing Searches

- USPTO does not require applicant to make a pre-filing search but a search is still a best practice
 - *Can help identify potential infringement risks*
 - *Can encourage earlier adoption of a different registrable and non-infringing mark if a conflict is found (cost and burden to switch increases with time)*
- Scope:
 - *Knockout/preliminary search – limited scope (e.g., federal only)*
 - *Comprehensive search – broader scope; ideally seeks to identify unregistered uses, state registrations, domain name registrations, and potential foreign priority claims too*
- Search results require legal analysis to be worthwhile

TYPES OF U.S. FEDERAL REGISTRATIONS

Discussion of the Two Different U.S. Federal Trademark Registers

Two Different Federal Registers

- There are two different U.S. federal trademark registers, with different requirements and different benefits:
 - *Principal Register*
 - *Supplemental Register*
- Registration on Principal Register secures rights throughout all U.S. states plus all U.S. territories and possessions
- Registration on the Principal Register is always preferable and pursuit of this type of registration is normally presumed

Principal Register

- Legal presumption of validity, ownership, and exclusive right to use mark with identified goods/services in all of USA - §§ [7\(b\)](#) and [33\(a\)](#)
- Provides constructive notice of claim of ownership - [§ 22](#)
- Can be used to block importation into USA - [§ 42](#) and [19 U.S.C. § 1526](#)
- Facilitates domain name (cybersquatting) actions ([UDRP/URS/ACPA](#)) and private marketplace exclusions (e.g., Amazon Brand Registry)
- May eventually establish incontestability - [§ 15](#)
- Enables use of ® symbol - [§ 29](#)
- Mark listed in [searchable records](#) and can be [considered](#) by USPTO against later conflicting applications
- Application for Principal Register can later be amended to instead be for Supplemental Register (except Madrid)

Supplemental Register

- For marks unregistrable on Principal Register still capable of distinguishing the applicant's goods or services and not wholly functional - [§ 23](#)
 - *Merely descriptive terms (without secondary meaning) accepted*
 - *No generic terms*
- Does not establish presumption of exclusive or proprietary rights
 - *Cannot be used to block importation into USA - [§ 28](#)*
 - *Inadequate (alone) for cybersquatting and private marketplace exclusion*
- Enables use of ® symbol - [§ 29](#)
- Mark listed in [searchable records](#) and can be [considered](#) by USPTO against later conflicting applications
- Registration occurs without any opposition period - [§ 24](#)
- Cannot later “convert” a registration on Supplemental Register to one on Principal Register—new application needed (overlap is permissible - [§ 27](#))
- Not available for Madrid Protocol extensions (§ 66(a))—new and separate U.S. application needed

FILING BASES

Guidance Regarding the Selection of Federal Application
Filing Bases in the USA, and Requirements

Selecting Filing Bases

- All U.S. federal applications for registration on Principal Register must specify at least one filing basis:
 - *Use in commerce in USA* - § 1(a)
 - *Intent-to-use (ITU)* - § 1(b)
 - *Pending foreign application* - § 44(d)
 - *Granted foreign registration* - § 44(e)
 - *Madrid Protocol extensions* - § 66(a)
- Multiple filing bases permitted
 - *Can claim different bases for different goods/services*
 - *Can claim both foreign priority and actual use or ITU in USA for same goods/services*
- See USPTO Timelines

Use in Commerce:

§1(a)

- Mark is already in actual (*bona fide*) use in commerce in the USA with associated goods/services – **verification required**
 - *Use in commerce with goods: (1) mark is placed on the goods, packaging for the goods, or displays associated with the goods (including webpage displays), and (2) the goods are actually being sold or transported in commerce in USA*
 - *Use in commerce with services: (1) mark is used in the sale, advertising, or rendering of the services, and (2) the services are actually being rendered in commerce in USA*
- Application must specify:
 - *applicant's name, domicile, and citizenship*
 - *date of applicant's first use of the mark anywhere*
 - *date of applicant's first use of the mark in commerce in the USA*
 - *good(s)/service(s) with which the mark is used, and applicable international (Nice) classification(s)*
 - *the mark (and English translation(s) if word(s) in mark have meaning in other language)*
- Specimen(s) evidencing use in commerce in each class also required at filing

Use in Commerce: §1(a) (cont.)

- **Advantages** of § 1(a) basis:
 - *Presumption of validity and ownership of mark back to claimed date of first use in commerce in USA (plus notice of the same)*
 - *Less need for later actions/fees in application*
- **Disadvantages** of § 1(a) basis:
 - *None (assuming requirements are met)*

Intent-to-Use (ITU): §1(b)

- Mark not yet used in commerce in USA but applicant has a *bona fide* intention, under circumstances showing good faith, to use mark in commerce in USA in the future with associated goods/services and is entitled to do so – **verification required**
- Application must specify:
 - *applicant's name, domicile, and citizenship*
 - *good(s)/service(s) with which the mark is intended to be used, and applicable international (Nice) classification(s)*
 - *the mark (and English translation(s) if word(s) in mark have meaning in other language)*
- Must submit statement of use with specimen(s) within 6 months of notice of allowance (extendable)
- Best practice: privately retain copies of detailed written business plans evidencing intent to use at time of filing

Intent-to-Use (ITU): §1(b) (cont.)

■ Advantages of § 1(b) basis:

- *Can secure priority (constructive use) as of application filing date for all USA*
- *Provides up to about three (3) years to establish use*
- *Can be used in addition to a § 44 basis (foreign application or foreign registration)*
- *Can amend § 1(b) basis to be § 1(a) (actual use) before notice of allowance*

■ Disadvantages of § 1(b) basis:

- *Will not register unless and until use in commerce in USA is established (and not enforceable while pending absent use)*
- *Tend to be more costly due to need for later statement of use*
- *Must pay for six-month extensions of time to submit statement of use with specimen(s) more than six (6) months after notice of allowance; maximum of five (5) extensions (30 additional months)*
- *Claim of bona fide intention to use as of filing date potentially subject to later dispute (especially if no written records retained)*

Pending Foreign Application: §44(d)

- Application for mark intended for use in USA can claim priority to filing date of foreign application (from a country party to an applicable treaty – Paris Convention)
 - *provides basis for priority filing date (only) but not basis for subsequent publication or registration (must subsequently perfect § 44(e) claim)*
 - *U.S. Trademark Office may require broad identifications of goods/services from foreign application to be more definite and specific (narrower)*
- Applicant must have a good faith (*bona fide*) intention to use the mark in commerce in USA with associated goods/services and be entitled to do so – **verification required**
 - *best practice: privately retain copies of detailed written business plans evidencing intent to use in USA at filing*
- Must file U.S. application within six (6) months from the date the foreign application was first filed

Pending Foreign Application: §44(d) (cont.)

- Application must specify:
 - *applicant's name, domicile, and citizenship*
 - *serial number of foreign priority application(s)*
 - can specify multiple foreign priority applications by good/service
 - *(a) specify filing date and country of first regularly filed foreign application; or (b) state that the application is based upon a subsequent regularly filed application in the same foreign country and that any prior-filed application has been withdrawn, abandoned, or the like and has not served as a basis for a right of priority*
 - *good(s)/service(s) with which the mark is intended to be used, and applicable international (Nice) classification(s)*
 - may not exceed the scope of the identification in the foreign priority application, but certain other differences in identifications permitted or required (for instance, deletion of goods/services)
 - additional goods/services can be included based on a different filing basis (§§ 1(a) or 1(b))
 - *the mark (and English translation(s) if word(s) in mark have meaning in other language)*
 - *optional: if multiple filing bases claimed for all goods/services, can specify no intent to rely on subsequent grant of foreign registration and only wish to assert a valid claim of priority*

Pending Foreign Application: §44(d) (cont.)

■ Advantages of § 44(d) basis:

- *Secure priority (constructive use in USA) as of foreign application filing date for all USA – priority foreign filing date retained even if foreign application abandoned*
- *Actual use in commerce in USA not required for filing or for registration (unique to foreign priority claims)*
- *Specimen(s) and statement of use not required*
- *No official fees to keep application suspended awaiting foreign registration (unlike ITU extension fees)*
- *Eligible for Supplemental Register*

■ Disadvantages of § 44(d) basis:

- *Relatively short time to claim priority (6 months)*
- *U.S. registration granted only after foreign application is granted – foreign registration delays may result in suspension of application in USA*
- *In absence of actual use in commerce in the USA, no enforceable rights until registration granted*
- *Intention to use in USA might later be disputed*

Granted Foreign Registration: §44(e)

- Application must specify:
 - *applicant's name, domicile, and citizenship*
 - *registration number and registration date of valid foreign priority registration(s) in country of origin*
 - for old registration, also specify details of renewal
 - can specify multiple foreign priority registrations by good/service
 - *good(s)/service(s) with which the mark is intended to be used, and applicable international (Nice) classification(s)*
 - may not exceed the scope of the identification in the foreign priority registration, but certain other differences in identifications permitted or required (for instance, deletion of goods/services)
 - additional goods/services can be included based on a different filing basis (§§ 1(a) or 1(b))
 - *the mark (and English translation(s) if word(s) in mark have meaning in other language)*

Granted Foreign Registration: §44(e) (cont.)

- Applicant must have a good faith (*bona fide*) intention to use the mark in commerce in USA with associated goods/services and be entitled to do so – **verification required**
 - *best practice: privately retain copies of detailed written business plans evidencing intent to use in USA at filing*
- True copy of foreign registration (or recent renewal certificate) also required, plus English translation if in other language
 - *certified copy of foreign registration generally not required but copy must be of certificate and not a database printout, etc.*
- Foreign registration must be from applicant's "country of origin" ([§ 44\(c\)](#)), which is (1) the country where owner has a *bona fide* and effective industrial or commercial establishment, (2) the country where the owner is domiciled, or (3) the country in which the owner is a national

Granted Foreign Registration: §44(e) (cont.)

■ Advantages of § 44(e) basis:

- *No time limit* – date of foreign registration irrelevant as long as foreign registration still in force
- *Actual use in commerce in USA not required for filing or for registration (unique to foreign priority claims)*
- *Specimen(s) and statement of use not required*
- *Can claim both § 44(d) and § 44(e) bases, if foreign priority registration filed and granted in prior 6 months*
- *Eligible for Supplemental Register*

■ Disadvantages of § 44(e) basis:

- *Priority only accrues as of date of U.S. filing (not to foreign application filing date)*
- *In absence of actual use in commerce in the USA, no enforceable rights until registration granted*
- *Intention to use in USA might later be disputed*

Madrid Protocol Extension: §66

- Madrid Protocol applications are filed with (or forwarded to) WIPO's International Bureau (IB) and then protection is extended to the USA
- USPTO can still issue office action and refuse registration
 - *Madrid Protocol governs filing but is not a substantive law harmonization treaty*
- U.S.-licensed attorney required for extensions to USA
- Post-registration filings asserting current use of mark still required at USPTO in addition to 10-year renewals at IB

Madrid Protocol Extension §66 (cont.)

■ Advantages of § 66 basis:

- *Efficient centralization of extensions to USA and other countries*
- *Six-month office action response deadlines*

■ Disadvantages of § 66 basis:

- *Post-grant filings required with both USPTO and IB*
- *Cannot amend application to be for the Supplemental Register (new U.S. application required)*
- *In absence of actual use in commerce in the USA, no enforceable rights until extension registration granted*
- *Intention to use in USA might later be disputed*
- *Subject to cancellation both locally in USA as well as through cancellation, restriction, expiration, or abandonment of foreign Basic Registration or Application*

False Statements to Obtain Registration Are Illegal

- Registrations procured by fraud are invalid - [§ 14\(3\)](#)
- Any person who procures a registration by a false or fraudulent declaration, representation, or submission is liable in a civil action (lawsuit) for damages sustained by another as a consequence - [§ 38](#)
- Anyone who knowingly and willfully makes any materially false, fictitious, or fraudulent statement or representation to USPTO can be convicted of a crime and fined, imprisoned up to 5 years, or both – [18 U.S.C. § 1001\(a\)](#)
- USPTO also expanding use of show cause orders and subsequent [administrative sanctions](#)

IMPORTANT: All assertions and verifications of use in commerce or intention to use plus all other statements to USPTO must be truthful!

SPECIMENS

Requirements for Evidence of Use in Commerce
for U.S. Federal Applications & Registrations

What Is a Specimen?

- A specimen is a sample of a mark as used in commerce in the USA
 - *It is real-life evidence of how the mark is actually used in connection with the goods or services identified in an application or registration; that is, it is evidence of what consumers see when they are considering whether to purchase the goods or services branded with the mark*
- Multiple goods/services in multiple classes generally require multiple specimens
- Acceptable specimens must *directly associate* mark with the identified goods or services
- Specimen(s) must be recent, or “current” for maintenance

Specimens for Goods

Acceptable

- Photo of mark on product itself or attached tag/label
- Photo of mark on packaging
- Printout of a web page (showing date and URL) where the product can be purchased (for example, “Add to cart” or bag icon)
- Catalog where ordering information is provided (for example, “Call this number to place an order”)
- Installable software:
 - *Download page*
 - *In-app screen capture*

Unacceptable

- Mock-ups/digital renderings/altered images
- Package insert (not visible at purchase)
- Mere advertising:
 - *Web page, brochure, or catalog with no way to purchase product*
 - *Magazine ad*
 - *Business card*
- Post-purchase confirmations:
 - *Invoice*
 - *Receipt*

Specimens for Services

Acceptable

- Advertising that describes the services:
 - *Web page mentioning services, showing URL and date of capture*
 - *Magazine ad or brochure mentioning services*
- Software (cloud) services:
 - *Sign-in screen capture*
 - *In-app screen capture*
- Business card or letterhead referencing services
- Photo of service vehicle
- Invoice with service details

Unacceptable

- Mock-ups, unpublished drafts, or the like
- Advertising (web page, brochure, or the like) that does not mention the services
- Business materials (receipt, invoice, business card, or the like) that do not mention services – blank forms insufficient

USPTO Increasingly Strict About Specimens

- Must show a real use and cannot be a mock up, printer's proof, digitally altered image, rendering of intended packaging, or draft of a website that shows how mark *might* appear
- Must show mark used with the identified goods or services
- Must depict same mark shown in application/registration
- Must show mark used in a way that consumers would perceive it as a source indicator for identified good/services (it must function as a mark – consider prominence of mark)
- For web page captures as specimens, must include the URL and date accessed or printed
 - *ideally this information should be embedded in the capture or printout – adjust method of making the capture or printout accordingly*
- See [Examination Guide](#) and [USPTO Presentation](#)

MAINTENANCE AND RENEWALS

Requirements for Maintaining a U.S. Federal Registration

Declarations of Use and Incontestability

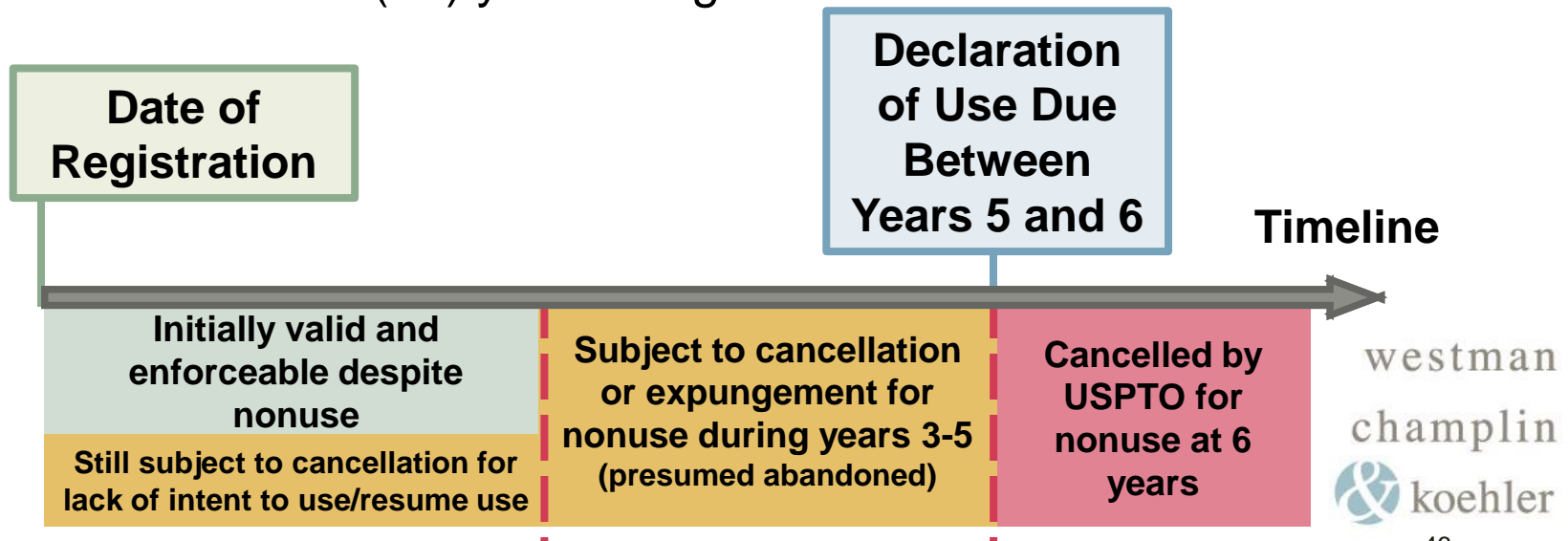
- **Declaration (affidavit) of use** required between 5th and 6th years of registration (§§ [8](#) or [71](#))
 - *Must certify mark is (currently) in use in commerce in USA for all identified goods/services (even for Madrid Protocol)*
 - can delete unused goods/services, but official fee(s) apply if done with (“after”) filing of declaration of use
 - *Must submit specimen(s) for each class of goods/services evidencing current use*
- **Declaration (affidavit) of incontestability** ([§ 15](#))
 - *Incontestability limits grounds for cancellation*
 - *Only available if mark has been in continuous use for five (5) consecutive years subsequent to registration and is still in use in commerce and no pending proceeding or final adverse decision against mark*

Excusable Nonuse

- If a mark is not in use with one or more identified goods/services, continued registration may be permitted if nonuse is due to special circumstances beyond owner's control rather than an intention to abandon ([37 C.F.R. § 2.161\(a\)\(6\)\(ii\)](#))
- Requirements for [excusable nonuse](#):
 - *list of the goods/services with which the mark is not in use in commerce in USA*
 - *date of the last use of the mark in commerce in USA*
 - *approximate date when use in commerce in USA is expected to resume*
 - *details regarding the reason for nonuse*
 - *specific steps being taken to resume use in USA*

Important Note About Foreign Priority & Use

- Registrations based on foreign priority without use in commerce in the USA are presumptively subject to cancellation or expungement if use in commerce has not begun within three (3) years of registration even though declaration of use to keep registration active is not due until the sixth (6th) year of registration



Renewal

- U.S. registrations can last indefinitely, provided there is continued use in commerce in the USA (or excusable nonuse) and registration is both valid and renewed
- Sections [8](#) and [9](#) renewal and declaration (affidavit) of use (or excusable nonuse) filed between 9th and 10th year of registration
 - *Can delete unused goods/services, but official fee(s) apply if done with (“after”) filing of declaration of use*
 - *Renewal process repeats every ten years*
 - *Madrid Protocol:*
 - Still must file Section 71 declaration of use with USPTO
 - But file renewal through WIPO IB
- See [USPTO Timeline](#) and [Madrid Timeline](#)

Deletions from Registration

- Goods/services no longer in use in commerce in USA must be deleted from a registration to be maintained
- (New) Fee(s) required to delete goods/services, per class, if filed with §§ 8 or 71 declaration of use
 - *Further deletion fee(s), plus deficiency fee, required if additional deletions of goods/services submitted while §§ 8 or 71 declaration of use is still pending*
 - *Can avoid fee(s) by deleting goods/services ([§ 7](#)) before filing declaration of use*
 - *Also, no fee to delete goods/services ([§ 7](#)) after acceptance of declaration of use*

Post-Registration Audits

- USPTO may select a registration for an [audit](#) if a certain number of goods/services or classes are identified in registration:
 - (a) Registration includes at least one (≥ 1) class with four or more (≥ 4) goods or services
 - OR
 - (b) Registration includes at least two (≥ 2) classes with two or more (≥ 2) goods or services
- If selected for audit, USPTO will also review acceptability of specimen(s) for any additional classes
- See [USPTO presentation](#)

CHALLENGING REGISTRATION

Procedures Through Which a U.S. Federal Trademark Application or
Registration Can be Challenged by Others

Procedures for Challenges

Pending Applications

- [Letter of protest](#)
 - Evidence relevant to grounds for refusal
 - Certain topics excluded
 - Submit before end of 30-day opposition period following publication (and ideally before publication), but for Madrid extensions must submit before 18-months after IB transmits application to USPTO
 - See [USPTO presentation](#)
- [Opposition](#)
 - Within 30 days of publication (extensions available)
 - Any grounds
- [Concurrent use](#) (rare)
 - Geographic restrictions

Granted Registrations

- [Cancellation](#)
 - Any grounds but grounds limited after 5 years
 - Never used with any or all goods/services after 3 years from registration (*new*)
- [Ex parte Expungement](#) (*new*)
 - Between 3-10 years
 - Mark never used with any or all goods/services
- [Ex parte Reexamination](#) (*new*)
 - Within 5 years
 - Any or all goods/services not used by relevant date (§1 only)
- [Interference](#) (rare)
- [District court lawsuit](#)
 - Any grounds but grounds limited when incontestable

MISLEADING NOTICES

Important Warning About False and Misleading Notices Sometimes
Sent to U.S. Trademark Applicants and Registrants

Beware! Scams Are Common

- Unscrupulous private entities use trademark information from USPTO databases to mail, email, or text trademark-related solicitations to applicants and registrants; while referencing actual application/registration information or deadlines, these entities create a misleading or false association with the USPTO to collect exorbitant and/or unnecessary fees
- More information, with examples of scams:
 - <https://www.uspto.gov/trademarks/protect/caution-misleading-notices>
 - https://www.wipo.int/pct/en/warning/pct_warning.html

Thank You

Austen Zuege

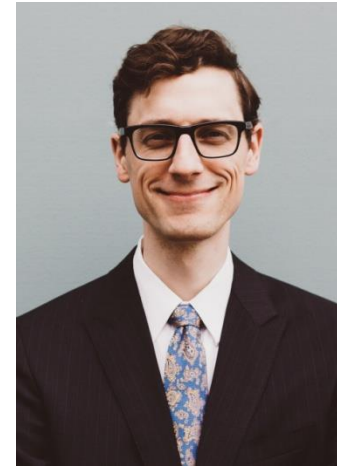
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