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Our Ref.: WBF/KI/CW/2026-0471-US

VIA FEDERAL EXPRESS AND ELECTRONIC MAIL

PRIVILEGED AND CONFIDENTIAL

TO: Brezelmann Discount KG
c/o Hartley & Steinwood PLLC (Registered Agent)
1900 K Street N.W., Suite 1100
Washington, D.C. 20006
Attn: Counsel of Record for Brezelmann Discount KG

AND DIRECT TO: Brezelmann Discount KG
Industriestraße 7
97980 Bad Mergentheim, Germany
Attn: Mr. Egon Brezelmann, Managing Partner

RE:	TRADEMARK INFRINGEMENT, FEDERAL TRADEMARK DILUTION, AND UNFAIR COMPETITION
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Dear Counsel (and Mr. Brezelmann):

This firm represents **KLÔTZZKÈTTÉ INC.** ("Klôtzzkètté" or "Our Client"), a corporation organized under the laws of the State of New York, having its principal place of business at 712 Fifth Avenue, New York, New York 10019, and the ultimate parent company of Our Client, **klôtzzkètté S.A.**, 9 Place Vendôme, 75001 Paris, France (the "Maison"). We write regarding the unlawful conduct of Brezelmann Discount KG ("Brezelmann" or "You"), which constitutes willful trademark infringement, federal trademark dilution, and unfair competition under the Lanham Act, 15 U.S.C. §§ 1051 et

seq., and applicable state law.

**THIS LETTER REQUIRES YOUR IMMEDIATE ATTENTION. FAILURE TO
COMPLY WITH THE DEMANDS BELOW WITHIN FOURTEEN (14)
CALENDAR DAYS OF THE DATE OF THIS LETTER WILL RESULT IN
COMMENCEMENT OF LEGAL PROCEEDINGS IN THE UNITED STATES
DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK
WITHOUT FURTHER NOTICE.**

I. THE PARTIES

A. Klôtzzkètté — Heritage and Global Reputation

The Maison klôtzzkètté was established in 1887 in Paris, France, by the de Klotzzkettie family as a bespoke leather goods atelier on the Place Vendôme. Since that time, the Maison has built a global reputation for unparalleled craftsmanship and luxury, with recognition in the United States that predates World War II. Today, Klôtzzkètté operates a flagship boutique at 712 Fifth Avenue in midtown Manhattan — one of the most prominent retail addresses in the United States — as well as shop-in-shop departments at Saks Fifth Avenue, Bergdorf Goodman, and Neiman Marcus.

Klôtzzkètté's annual United States advertising expenditure exceeds USD 18,000,000.00. The brand's goods are regularly featured in publications including *Vogue*, *Harper's Bazaar*, *Town & Country*, and *The New York Times*. Celebrity associations include internationally recognized entertainers, heads of state, and members of European royal houses. Klôtzzkètté handbags retail for between USD 1,800 and USD 12,500.

B. Brezelmann's Background

Brezelmann Discount KG is a limited partnership organized under German law that operates discount retail stores across Germany and, as relevant here, an online store exclusively through the Donauzon Marketplace platform. Upon information and belief, Brezelmann has no legitimate connection to Klôtzzkètté, has never been authorized to use Klôtzzkètté's marks, and has no bona fide right to register, use, or exploit any mark confusingly similar to the Klôtzzkètté Famous Marks.

II. KLÔTZZKÈTTÉ'S FAMOUS MARKS

Our Client owns the following United States trademark registrations and pending applications (the "Famous Marks"), which have been in continuous use in interstate commerce in the United States for decades:

Mark	U.S. Reg. / App. No.	Classes	Status
KLÔTZZKÈTTÉ (word mark)	Reg. No. 5,247,118	18, 25	Registered — Valid
K-Crown Design (figurative)	Reg. No. 6,112,890	18, 25	Registered — Valid

Sac à fermoir Lyon (3D trade dress)	Reg. No. 6,445,227	18	Registered — Valid
MAIN HUMAINE GARANTIE (cert. mark)	App. No. 98/604,112	35	Pending
Cliquet de Cassis (sound mark)	App. No. 98/619,554	18, 25	Pending

The Famous Marks are famous within the meaning of 15 U.S.C. § 1125(c)(2)(A). The KLÔTZZKÈTTÉ mark has been in use in United States commerce continuously since at least as early as September 12, 2001, and has been federally registered since July 18, 2017. The marks are distinctive, famous, and entitled to the broadest possible scope of protection under United States federal and state law.

III. BREZELMANN'S INFRINGING CONDUCT

It has come to Our Client's attention that Brezelmann has been and is engaged in the following infringing conduct:

1. Use of the Marks CLOTZ KETTE, klotzz.kette, and K-Krönchen. Beginning on a date not yet precisely ascertained but believed to be no later than October 2025, Brezelmann has marketed, offered for sale, sold, and distributed in the United States and internationally fashion accessories and handbags bearing the designations "CLOTZ KETTE," "klotzz.kette," and "K-Krönchen." These marks are confusingly similar, and in some instances virtually identical, to Our Client's Famous Marks.

2. Sale Through Donauzon Marketplace. Brezelmann's infringing goods were sold exclusively online through the Donauzon Marketplace platform. Our Client's investigators conducted fourteen (14) test purchases in the United States and internationally, confirming the availability of infringing goods and documenting side-by-side comparisons with authentic Klôtzzkètté products. In each instance, the surface finish, hardware treatment, and overall trade dress of the Brezelmann product were virtually indistinguishable from Our Client's authentic goods.

3. Filing of Fraudulent U.S. Trademark Application. On November 14, 2025, Brezelmann filed Application Serial No. 98/717,442 with the United States Patent and Trademark Office for the mark CLOTZ KETTE, falsely attesting to bona fide use in commerce in the United States. Our Client has filed a Notice of Opposition before the Trademark Trial and Appeal Board (Opposition No. 91-289412), which is pending.

IV. LEGAL CLAIMS

Brezelmann's conduct gives rise to the following claims under federal and New York state law:

Lanham Act § 32(1), 15 U.S.C. § 1114: Trademark infringement — Use of marks confusingly similar to Klôtzzkètté's registered marks in connection with the sale of goods in commerce without Klôtzzkètté's consent.

Lanham Act § 43(a), 15 U.S.C. § 1125(a): False designation of origin and unfair competition — Use of designations and trade dress that are likely to cause confusion, mistake, or deception as to the affiliation, connection, or association of Brezelmann

with Klôtzzkètté, or as to the origin, sponsorship, or approval of Brezelmann's goods.

Lanham Act § 43(c), 15 U.S.C. § 1125(c): Federal trademark dilution — Brezelmann's use of the CLOTZ KETTE and related marks causes dilution by blurring and tarnishment of the famous KLÔTZZKÈTTÉ marks. Use commenced after the marks became famous, as required by § 1125(c)(1).

New York General Business Law § 360-l: Injury to business reputation and dilution — Brezelmann's acts are likely to cause injury to the business reputation and to dilute the distinctive quality of Our Client's marks in the State of New York.

V. DEMANDS

Our Client demands that Brezelmann, within **fourteen (14) calendar days** of the date of this letter:

- (a) **Cease and desist from all use** of the marks CLOTZ KETTE, klotzz.kette, K-Krönchen, and any other designation confusingly similar to or dilutive of the Klôtzzkètté Famous Marks, in the United States and in all countries where Our Client's marks are registered, including all product labels, packaging, advertising, online listings, social media, and promotional materials;
- (b) **Withdraw U.S. Trademark Application Serial No. 98/717,442** by written notice to the USPTO and provide Our Client with a copy of such withdrawal within the fourteen-day period;
- (c) **Withdraw all corresponding foreign trademark applications** for CLOTZ KETTE or any confusingly similar mark, including EUIPO application EUTMA 019 117 456, within the fourteen-day period;
- (d) **Account for and disgorge all profits** derived from the sale of infringing goods in the United States and internationally, by providing Our Client with a complete accounting within thirty (30) days;
- (e) **Destroy or deliver up** for destruction all infringing goods in Brezelmann's possession, custody, or control, and certify in writing within thirty (30) days that such destruction has been completed;
- (f) **Execute**, within the fourteen-day period, a written undertaking to refrain from any further use of the infringing marks, in a form acceptable to Our Client, and subject to a consent judgment to be entered in the Southern District of New York.

Our Client is prepared to consider a confidential pre-litigation settlement on commercially reasonable terms. Any such settlement would include cessation of all infringing activity, withdrawal of the U.S. and EU applications, and a financial component reflecting Our Client's damages, costs, and attorneys' fees. If you wish to explore settlement, please contact the undersigned no later than April 16, 2026.

VI. LITIGATION HOLD NOTICE

You are hereby on notice of Our Client's claims. Pursuant to your legal obligations under applicable discovery rules and the standards articulated in *Zubulake v. UBS Warburg LLC*, 220 F.R.D. 212 (S.D.N.Y. 2003), you are required to immediately preserve all documents, communications, and data in your possession, custody, or control that are potentially relevant to this dispute, including but not limited to:

- All records relating to the development, adoption, and use of the marks CLOTZ KETTE, klotzz.kette, and K-Krönchen;
- All product design, manufacturing, and sourcing records;
- All sales records, invoices, and financial data for products bearing the infringing marks;
- All communications with the USPTO, EUIPO, and any other trademark office;
- All communications with Donauzon Marketplace GmbH relating to the infringing products;
- All communications with customers, wholesalers, and distributors relating to the infringing products;
- All electronic records, including emails, instant messages, databases, and social media content.

Failure to preserve relevant evidence may result in sanctions, including adverse inference instructions, under applicable federal law.

VII. STATEMENT OF LITIGATION READINESS

Please be advised that Our Client has authorized us to file suit in the United States District Court for the Southern District of New York should you fail to comply with the foregoing demands within the stated fourteen-day period. Our Client's complaint — draft attached as **Exhibit A** — is prepared and will be filed without further notice. Our Client will seek:

- Preliminary and permanent injunctive relief pursuant to 15 U.S.C. § 1116;
- Disgorgement of Brezelmann's profits pursuant to 15 U.S.C. § 1117(a);
- Our Client's actual damages;
- Enhanced damages up to three times actual damages pursuant to 15 U.S.C. § 1117(a);

- Attorneys' fees in an amount to be determined by the Court;
- Costs of the action;
- Such other and further relief as the Court deems just and proper.

SCHEDULE A — U.S. TRADEMARK REGISTRATIONS AND APPLICATIONS

The following constitutes a comprehensive (non-exhaustive) list of Our Client's United States trademark rights:

Mark Description	Reg./App. No.	Int'l Class(es)	Status
KLÔTZZKÈTTÉ (standard characters)	5,247,118	18, 25	Registered
KLÔTZZKÈTTÉ (stylized)	5,319,004	18, 25	Registered
K-Crown Design (figurative)	6,112,890	18, 25	Registered
Sac à fermail Lyon (3D trade dress)	6,445,227	18	Registered
Golden Thread at Hem (position mark)	6,891,330	25	Registered
Cliquet de Cassis (sound mark)	App. 98/619,554	18, 25	Pending
MAIN HUMAINE GARANTIE (cert. mark)	App. 98/604,112	35	Pending
Texture pointillée Vendôme (haptic)	App. 98/712,888	18	Pending

We trust that Brezelmann will comply with the demands set forth in this letter and avoid the significant cost, disruption, and reputational harm that litigation would entail. We look forward to hearing from you no later than April 23, 2026.

Nothing in this letter shall be construed as a waiver or limitation of any of Our Client's rights or remedies, all of which are expressly reserved.

Very truly yours,

WHITMAN BRENNAN FORSYTHE LLP

Catherine R. Whitman, Esq.

New York State Bar No. 4882901

Partner — Intellectual Property

Direct: (212) 555-7201 · cwhitman@whitmanbrennanlegal.com

cc: Jonathan T. Brennan, Esq., Whitman Brennan Forsythe LLP

Dr. Friedrich-Wilhelm von Steinacker, Steinacker Lichtenberg & Partners, Munich

Comtesse Beatrice de Klotzckettie, klôtzckètté S.A., Paris (via secure courier)