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9 **UNITED STATES DISTRICT COURT**
 10 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

11 LEVI STRAUSS & CO.,

12 Plaintiff,

13 v.

14 AZZAS 2154 S.A.; SOMA BRANDS
 15 INTERNATIONAL GMBH; and GRUPO DE
 16 MODA SOMA S.A.,
 Defendants.

Case No. 26-cv-05661

**COMPLAINT FOR TRADEMARK
 INFRINGEMENT, DILUTION, AND
 UNFAIR COMPETITION
 (INJUNCTIVE RELIEF SOUGHT)**

JURY TRIAL DEMAND

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 18 This lawsuit is necessary because Defendants Azzas 2154 S.A., Soma Brands International
 19 GMBH, and Grupo de Moda Soma S.A. (collectively “Defendants” or “Farm Rio”) have
 20 misappropriated Plaintiff Levi Strauss & Co.’s (“LS&Co.”) famous tab trademark (the “Tab
 21 Trademark”) as a symbol for their own apparel products. LS&Co. is the renowned apparel company
 22 whose founders invented the blue jean. LS&Co. has been manufacturing and selling apparel for over
 23 150 years. From its gold rush beginnings, LS&Co. became one of the preeminent casual apparel
 24 companies of our time. The company’s apparel production was protected as an “essential industry”
 25 during World War II, and exhibits at institutions such as the Smithsonian and Museum of Modern Art
 26 display photographs underscoring that LS&Co.’s products are a “staple of American culture,
 27 symbolizing youth, freedom, and effortless cool.”

28 LS&Co. brands its apparel products using some of the oldest and most well-respected apparel

1 trademarks in the world, including the Tab Trademark. The Tab Trademark appears on almost all
2 jeans sold by LS&Co. and is also featured on other apparel products, such as shirts, jackets, and
3 accessories. Every year, millions of jeans, shirts, jackets, and other products are sold bearing the Tab
4 Trademark. As shown below, LS&Co. uses the Tab Trademark in many colors, including red, white,
5 blue, black, and silver.





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8 LS&Co. adopted the Tab Trademark in 1936, registered the mark in 1938, and at various
9 times, has used the mark as part of the corporate logo, in retail signage, and on the levi.com website as
10 a sign of all the company's products and services. As shown above, the Tab Trademark sometimes
11 bears the famous LEVI'S® trademark, and sometimes bears only the ® symbol. LS&Co. also owns
12 registered and common law rights in word marks that reference the history and heritage of the Tab
13 Trademark, including LS&Co.'s ORANGE TAB, BLUE TAB, RED TAB, and SILVERTAB marks.

14 To stop Defendants from continuing to misuse and trade on LS&Co.'s famous Tab Trademark,
15 reputation, and goodwill, LS&Co. seeks preliminary and permanent injunctive relief as well as
16 appropriate compensatory remedies and fees and costs necessitated by Defendants' conduct. LS&Co.
17 alleges as follows:

18 **JURISDICTION, VENUE, AND INTRA-DISTRICT ASSIGNMENT**

19 1. Plaintiff LS&Co.'s claims arise under the Trademark Act of 1946 (the Lanham Act),
20 as amended by the Trademark Dilution Revision Act of 2006 (15 U.S.C. §§ 1051, *et seq.*). This
21 Court has jurisdiction over such claims pursuant to 28 U.S.C. §§ 1338(a) and 1338(b) (trademark
22 and unfair competition), 28 U.S.C. § 1331 (federal question) and 15 U.S.C. § 1121 (Lanham Act).
23 This Court has supplemental jurisdiction over the remaining state law claims under 28 U.S.C.
24 § 1367.

25 2. LS&Co. is informed and believes that venue is proper in this Court under 28 U.S.C.
26 § 1391(b) because Defendants transact affairs in this district and sell or distribute their infringing
27 products and services in this district, and because a substantial part of the events giving rise to the
28 claims asserted arose in this district.

1 3. Intra-district assignment to any division of the Northern District is proper under Local
2 Rule 3-2(c) and the Assignment Plan of this Court as an “Intellectual Property Action.”

3 **PARTIES**

4 4. LS&Co. is a Delaware corporation with its principal place of business at Levi’s Plaza,
5 1155 Battery Street, San Francisco, California 94111. Operating since approximately the 1850s,
6 LS&Co. is one of the oldest and best-known apparel companies in the world. It manufactures,
7 markets, and sells a variety of apparel.

8 5. LS&Co. is informed and believes that Defendant AZZAS 2154 S.A. is a Brazilian
9 corporation headquartered at Rua Fernandes Tourinho, 147 – Funcionários, Belo Horizonte – MG,
10 30112-000, Brazil.

11 6. LS&Co. is informed and believes that Defendant Grupo de Moda Soma S.A. is a
12 Brazilian corporation headquartered at São Cristóvão Street, n. 786, Galpão, São Cristóvão – Rio de
13 Janeiro/RJ, Brazil, Zip Code 20.940-000

14 7. LS&Co. is informed and believes that Defendant Soma Brands International GmbH is a
15 Swiss limited liability company headquartered at Grafenauweg 8, Zug 6300, Switzerland.

16 8. LS&Co. is informed and believes that Defendants manufacture, distribute, and/or sell
17 apparel, including pants, under the brand name FARM RIO, bearing trademarks and branding
18 elements that infringe LS&Co.’s Tab Trademark. Defendants’ infringing products are offered for sale
19 and sold throughout the United States, including in this judicial district.

20 **FACTS AND ALLEGATIONS COMMON TO ALL CLAIMS**

21 9. LS&Co. marks its products with trademarks that are famous around the world. Among
22 these trademarks is LS&Co.’s famous Tab Trademark, which, in one configuration that is used on
23 many products, consists of a marker sewn into pocket seams or one of the regular structural seams of
24 the garment. LS&Co. uses the Tab Trademark on jeans, pants, jackets, shirts, skirts, shorts,
25 accessories, and a variety of other clothing products.

26 10. LS&Co. continuously has used the Tab Trademark for nearly 90 years to distinguish its
27 products. LS&Co. began to display the Tab Trademark on the rear pocket of its pants in 1936 when its
28 then National Sales Manager, Leo Christopher Lucier, proposed placing a folded cloth ribbon in the

1 structural seams of the rear pocket. The purpose of this “tab” was to provide “sight identification” of
2 LS&Co.’s products. Given the distinctiveness of the Tab Trademark, Mr. Lucier asserted that “no
3 other maker of overalls can have any other purpose in putting a colored tab on an outside patch
4 pocket, unless for the express and sole purpose of copying our mark and confusing the customer.”

5 11. For many years prior to the events giving rise to this Complaint and continuing to the
6 present, LS&Co. annually has spent great amounts of time, effort, and money advertising and
7 promoting the products on which its Tab Trademark is used. LS&Co. has sold hundreds of millions of
8 these products bearing its Tab Trademark, all over the world, accounting annually for billions of
9 dollars in sales, including sales throughout the United States and in California. Through these
10 investments and large sales, LS&Co. has created considerable goodwill and a reputation for high-
11 quality, fashionable products.

12 12. The Tab Trademark is famous and recognized around the world and throughout the
13 United States by consumers as signifying authentic, high-quality LS&Co.’s garments. LS&Co.’s Tab
14 Trademark was famous among the general consuming public long before Defendants began selling the
15 products challenged in this Complaint. LS&Co.’s Tab Trademark is registered in the United States, in
16 the State of California, and around the world. All registrations and common law marks for the Tab
17 Trademark are in full force and effect, valid and protectable, and exclusively owned by LS&Co.
18 LS&Co. continuously has used each of its registered trademarks, from the registration date or earlier,
19 until the present and during all times relevant to LS&Co.’s claims.

20 13. In addition to its common law rights, LS&Co. owns the following United States and
21 California trademark registrations, among others, for its Tab Trademark. The federal registrations
22 have become incontestable under the provisions of 15 U.S.C. § 1065.

- 23 a. U.S. Registration No. 516,561 (first used as early as September 1, 1936;
24 registered October 18, 1949);
- 25 b. U.S. Registration No. 1,157,769 (first used as early as September 1,
26 1936; registered June 16, 1981);
- 27 c. U.S. Registration No. 2,791,156 (first used as early as September 1,
28 1936; registered December 9, 2003);

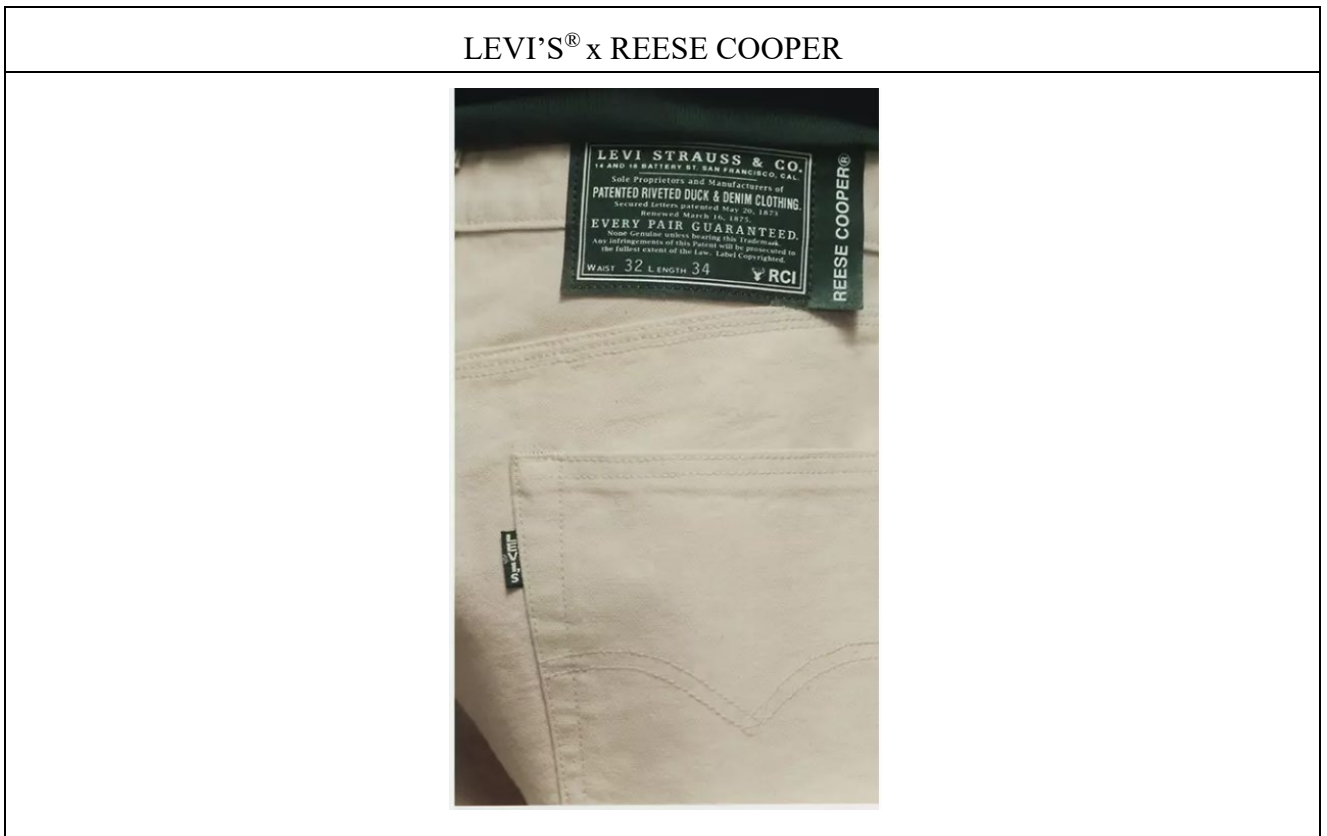
- d. U.S. Registration No. 356,701 (first used as early as September 1, 1936; registered May 10, 1938);
- e. U.S. Registration No. 577,490 (first used as early as September 1, 1936; registered July 21, 1953);
- f. U.S. Registration No. 774,625 (first used as early as May 22, 1963; registered August 4, 1964);
- g. U.S. Registration No. 775,412 (first used as early as October 9, 1957; registered August 18, 1964);
- h. U.S. Registration No. 2,726,253 (first used as early as March 7, 1969; registered June 17, 2003);
- i. U.S. Registration No. 2,620,144 (first used as early as February, 1999, registered September 17, 2002); and
- j. California Registration No. 052312 (first used as early as March 7, 1969; registered June 12, 1974).

14. Examples of LS&Co.'s use of its Tab Trademark on are shown below:





15. LS&Co. also uses its Tab Trademark in connection with many of its collaborations with other brands, including collaborations with some of the most well-respected designers and fashion houses in the industry. Examples of LS&Co.'s use of its Tab Trademark on garments put out under these collaborations follow:



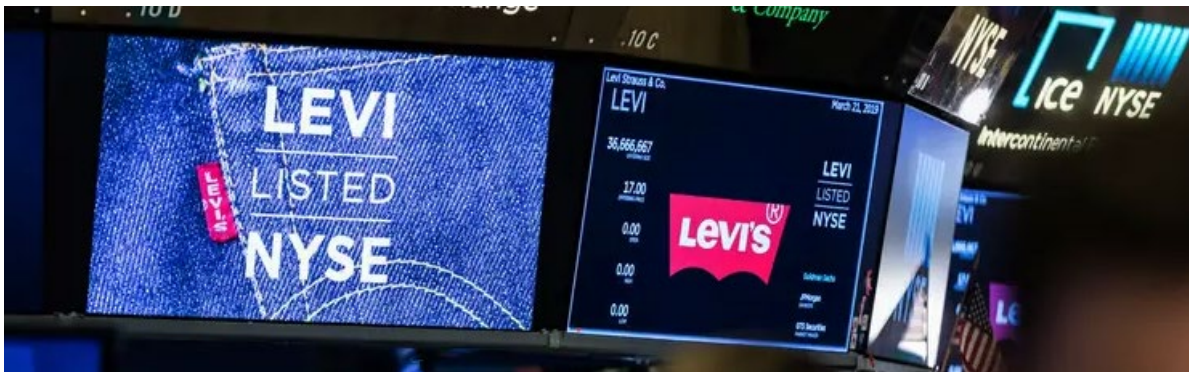
1 LEVI'S® x VALENTINO



12 LEVI'S® x MIU MIU



1 16. In addition to using the Tab Trademark on products, LS&Co. also uses and has used
2 the mark to denote retail services, including use of the trademark as its main service mark (collectively
3 “Retail Services Tab Trademark”) for several years. Examples of these uses include as follows:



15 **Defendants’ Infringement of LS&Co.’s Tab Trademark**

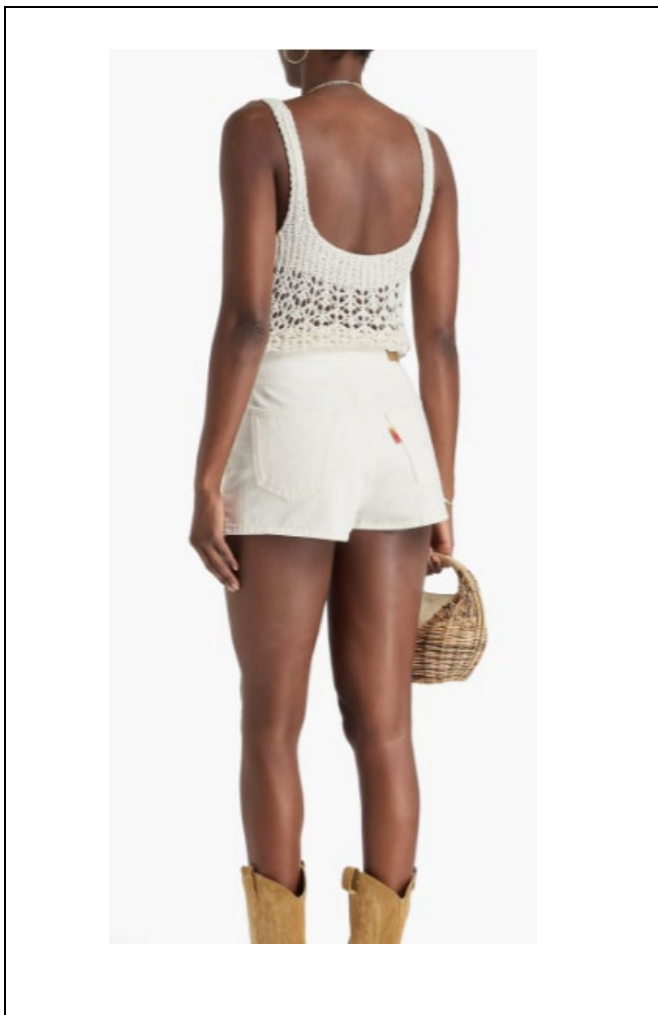
16 17. Beginning at some point in the past and continuing until the present, Defendants—
17 under the FARM RIO brand—have manufactured, promoted, and sold clothing that infringe and dilute
18 LS&Co.’s famous Tab Trademark. Examples of products bearing infringing tabs (the “FARM RIO
19 Infringing Tab”) are shown below:

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27 18. The FARM RIO Infringing Tabs are substantially similar to LS&Co.’s Tab Trademark.
28 Based on its investigation, LS&Co. is informed and believes that Defendants have manufactured,

1 sourced, marketed, and/or sold substantial quantities of garments bearing the FARM RIO Infringing
2 Tabs.

3 19. Defendants' use of the FARM RIO Infringing Tabs is particularly concerning given
4 that LS&Co. has previously collaborated with the FARM RIO brand in connection with a limited-
5 edition product release. Through this collaboration, Defendants were unquestionably aware of
6 LS&Co.'s Tab Trademark and the goodwill associated with it. If Defendants' unauthorized,
7 infringing use continues, consumers are likely to be confused—both at point of sale and post-sale—
8 about the source, sponsorship, affiliation, or approval of Defendants' products bearing the FARM RIO
9 Infringing Tabs, including whether such products are associated with, endorsed by or part of a new
10 collaboration or partnership with LS&Co.

11 20. In addition to causing damages, Defendants' actions have caused and will cause
12 LS&Co. irreparable harm for which money damages and other remedies are inadequate. LS&Co. has
13 attempted to resolve this matter short of litigation, but the parties were unable to reach an agreement.
14 Unless Defendants are restrained preliminarily and permanently by this Court, they will continue
15 and/or expand their illegal activities and otherwise continue to cause great and irreparable damage and
16 injury to LS&Co. by, among other things:

- 17 a. Depriving LS&Co. of its rights to use and control use of its Tab
18 Trademark and maintain its reputation with consumers, licensees, and
19 collaborators, including the exclusive use of its trademarks on products
20 and services that LS&Co. creates, produces, licenses, and sells;
- 21 b. Creating a likelihood of confusion, mistake, and deception among
22 consumers and the trade as to the source of the infringing products;
- 23 c. Causing the public falsely to associate LS&Co. with Defendants and/or
24 their products, or vice versa;
- 25 d. Causing incalculable and irreparable damage to LS&Co.'s goodwill,
26 reputation and standing with consumers, licensees and collaborators;
- 27 e. Diluting the capacity of its Tab Trademark to differentiate LS&Co.'s
28 products from others;

- f. Causing LS&Co. to lose sales of its genuine clothing products; and
- g. Causing others to believe the distinctive features of the Tab Trademark may be misappropriated for their use.

FIRST CLAIM

FEDERAL TRADEMARK INFRINGEMENT

(15 U.S.C. §§ 1114-1117; Lanham Act § 32)

21. LS&Co. realleges and incorporates by reference each of the allegations contained in paragraphs 1 through 20 of this Complaint.

22. Without LS&Co.’s consent, Defendants have used—in connection with the sale, offering for sale, distribution, or advertising of its products—the FARM RIO Infringing Tabs—which are confusingly similar to LS&Co.’s registered Tab Trademark.

23. Defendants’ use of the FARM RIO Infringing Tabs on its products (examples of which are shown in this Complaint) infringe upon LS&Co.’s registered Tab Trademark.

24. Defendants were aware of LS&Co.’s registered Tab Trademark by virtue of LS&Co.’s prior collaboration with the FARM RIO brand in connection with a limited-edition product release.

25. Defendants’ acts of willful trademark infringement have been committed with the intent to cause confusion, mistake, or deception, cause harm to LS&Co. and consumers, and are in violation of 15 U.S.C. § 1114.

26. As a direct and proximate result of Defendants’ infringing activities, LS&Co. is entitled to recover all of Defendants’ unlawful profits and LS&Co.’s substantial damages under 15 U.S.C. 1117(a).

27. Defendants’ infringement of LS&Co.’s Tab Trademark is an exceptional case and was intentional, entitling LS&Co. to treble the amount of its damages and Defendants’ profits, and to an award of attorneys’ fees under 15 U.S.C. §§ 1117(a).

28. LS&Co. is entitled to injunctive relief pursuant to 15 U.S.C. 1116(a).

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1 **SECOND CLAIM**

2 **FEDERAL UNFAIR COMPETITION**

3 **(False Designation of Origin and False Description)**

4 **(15 U.S.C. § 1125(a); Lanham Act § 43(a))**

5 29. LS&Co. realleges and incorporates by reference each of the allegations contained in
6 paragraphs 1 through 20 of this Complaint.

7 30. Defendants' use of the FARM RIO Infringing Tabs tends falsely to describe its
8 products and services within the meaning of 15 U.S.C. § 1125(a)(1). Defendants' conduct is likely to
9 cause confusion, mistake, or deception by or in the public as to the affiliation, connection, association,
10 origin, sponsorship, or approval of Defendants and Defendants' products and services, to the detriment
11 of LS&Co. and consumers in violation of 15 U.S.C. § 1125(a)(1).

12 31. Defendants were aware of LS&Co.'s Tab Trademark by virtue of LS&Co.'s prior
13 collaboration with the FARM RIO brand in connection with a limited-edition product release.

14 32. As a direct and proximate result of Defendants' willful infringing activities, LS&Co. is
15 entitled to recover all of Defendants' unlawful profits and LS&Co.'s substantial damages under
16 15 U.S.C. § 1117(a).

17 33. Defendants' infringement of LS&Co.'s Tab Trademark represents an exceptional case
18 and was intentional, entitling LS&Co. to treble the amount of its damages and Defendants' profits, and
19 to an award of attorneys' fees under 15 U.S.C. § 1117(a).

20 34. LS&Co. is entitled to injunctive relief pursuant to 15 U.S.C. § 1116(a).

21 **THIRD CLAIM**

22 **FEDERAL DILUTION OF FAMOUS MARKS**

23 **(Trademark Dilution Revision Act of 2006)**

24 **(15 U.S.C. § 1125(c); Lanham Act § 43(c))**

25 35. LS&Co. realleges and incorporates by reference each of the allegations contained in
26 paragraphs 1 through 20 of this Complaint.

27 36. LS&Co.'s Tab Trademark is distinctive and famous within the meaning of the
28 Trademark Dilution Revision Act of 2006, 15 U.S.C. § 1125(c), and was distinctive and famous prior

1 to Defendants’ conduct as alleged in this Complaint.

2 37. Defendants’ conduct is likely to cause dilution of LS&Co.’s Tab Trademark by
3 diminishing each of their distinctiveness in violation of the Trademark Dilution Revision Act of 2006,
4 15 U.S.C. § 1125(c).

5 38. Defendants were aware of LS&Co.’s famous Tab Trademark by virtue of LS&Co.’s
6 prior collaboration with the FARM RIO brand in connection with a limited-edition product release.

7 39. Defendants diluted LS&Co.’s Tab Trademark willfully, entitling LS&Co. to an award
8 of damages and disgorgement of Defendants’ profits.

9 40. LS&Co. is entitled to injunctive relief pursuant to 15 U.S.C. §§ 1116(a) and 1125(c).

10 **FOURTH CLAIM**

11 **CALIFORNIA TRADEMARK INFRINGEMENT AND DILUTION UNDER CALIFORNIA**

12 **AND COMMON LAW**

13 **(Cal. Bus. & Prof. Code §§ 14200 *et seq.*; Cal. Bus. & Prof. Code § 14247)**

14 41. LS&Co. realleges and incorporates by reference each of the allegations contained in
15 paragraphs 1 through 20 of this Complaint.

16 42. LS&Co. owns registered and common law rights in its Tab Trademark.

17 43. Defendants’ use of the FARM RIO Infringing Tabs—that are substantially similar to
18 the Tab Trademark—occurred without LS&Co.’s consent.

19 44. LS&Co.’s Tab Trademark became famous in California long before Defendants began
20 using their infringing trademarks and designs.

21 45. Defendants’ use of the FARM RIO Infringing Tabs is likely to cause consumer
22 confusion about the source of Defendants’ goods and services or about a relationship between
23 LS&Co., and Defendants and is likely to dilute LS&Co.’s Tab Trademark, in violation of California
24 Business & Professions Code §§ 14200 *et seq.*, California Business & Professions Code § 14247, and
25 California common law.

26 46. Defendants were aware of LS&Co.’s Tab Trademark by virtue of LS&Co.’s prior
27 collaboration with the FARM RIO brand.

28 47. Defendants infringed and diluted LS&Co.’s Tab Trademark with knowledge and intent

1 to cause confusion, mistake, or deception.

2 48. Defendants’ conduct is aggravated by that kind of willfulness, wantonness, malice, and
3 conscious indifference to the rights and welfare of LS&Co., for which California law allows the
4 imposition of exemplary damages.

5 49. Pursuant to California Business & Professions Code §§ 14247 and 14250, LS&Co. is
6 entitled to injunctive relief and damages in the amount of three times Defendants’ profits and three
7 times all damages suffered by LS&Co. by reason of Defendants’ manufacture, use, display, and sale
8 of infringing goods and services.

9 **FIFTH CLAIM**

10 **CALIFORNIA UNFAIR COMPETITION**

11 **(Cal. Bus. & Prof. Code § 17200)**

12 50. LS&Co. realleges and incorporates by reference each of the allegations contained in
13 paragraphs 1 through 20 of this Complaint.

14 51. Defendants’ conduct constitutes “unlawful, unfair or fraudulent business act[s] or
15 practice[s] and unfair, deceptive, untrue or misleading advertising” within the meaning of California
16 Business & Professions Code section § 17200.

17 52. LS&Co. is entitled to injunctive relief preventing the conduct alleged in this
18 Complaint.

19 **PRAYER FOR JUDGMENT**

20 WHEREFORE, LS&Co. prays that this Court grant it the following relief:

21 1. Adjudge that Defendants infringed LS&Co.’s Tab Trademark in violation of
22 LS&Co.’s rights under common law, 15 U.S.C. § 1114, and/or California law;

23 2. Adjudge that Defendants have competed unfairly with LS&Co. in violation of
24 LS&Co.’s rights under common law, 15 U.S.C. § 1125(a), and/or California law;

25 3. Adjudge that Defendants’ activities are likely to dilute LS&Co.’s famous Tab
26 Trademark, in violation of LS&Co.’s rights under common law, 15 U.S.C. § 1125(c), and/or
27 California law;

28 4. Adjudge that Defendants and their agents, employees, attorneys, successors, assigns,

1 affiliates, and joint venturers and any person(s) in active concert or participation with it, and/or any
2 person(s) acting for, with, by, through or under it, be enjoined and restrained at first during the
3 pendency of this action and thereafter permanently from:

- 4 a. Manufacturing, producing, sourcing, importing, exporting, selling,
5 buying, offering for sale, distributing, licensing, advertising, or
6 promoting any goods or services, using any words, symbols or designs
7 that so resemble LS&Co.'s Tab Trademark as to be likely to cause
8 confusion, mistake or deception, on or in connection with any product or
9 service that is not authorized by or for LS&Co., including without
10 limitation, the infringing trademarks and designs that are the subject of
11 this Complaint and for which Defendants are responsible, or any other
12 approximation of LS&Co.'s trademarks;
- 13 b. Using any word, term, name, symbol, device, design, or combination
14 thereof that causes or is likely to cause confusion, mistake, or deception
15 as to the affiliation or association of Defendants' products and services
16 with LS&Co. or as to the origin of Defendants' goods and services, or
17 any false designation of origin, false or misleading description or
18 representation of fact, or any false or misleading advertising;
- 19 c. Claiming trademark rights in the FARM RIO Infringing Tabs, or any
20 other word, symbol, or design that is confusingly similar to the Tab
21 Trademark, including by applying now or in the future for federal
22 registration of trademarks comprising the FARM RIO Infringing Tabs
23 or any other word, symbol, or design that is similar to the Tab
24 Trademark;
- 25 d. Infringing LS&Co.'s rights in and to any of its trademarks or otherwise
26 damaging LS&Co.'s goodwill or business reputation;
- 27 e. Further diluting the Tab Trademark;
- 28 f. Otherwise competing unfairly with LS&Co. in any manner; and

1 g. Continuing to perform in any manner whatsoever any of the other acts
2 complained of in this Complaint;

3 5. Adjudge that Defendants are required immediately to supply LS&Co.'s counsel with
4 a complete list of individuals and entities from whom or which they purchased, and to whom or
5 which they sold, offered for sale, distributed, advertised or promoted, infringing products and
6 services as alleged in this Complaint;

7 6. Adjudge that Defendants are required immediately to deliver to LS&Co.'s counsel,
8 their entire inventory of infringing products and services, including without limitation shirts, shorts,
9 rompers, pants, dresses, and any other clothing, packaging, labeling, photographs, advertising and
10 promotional material, and all plates, patterns, molds, matrices and other material for producing or
11 printing such items, domain names, or social media handles that are in their possession or subject to
12 their control and that infringe or facilitate infringement of LS&Co.'s trademarks as alleged in this
13 Complaint;

14 7. Adjudge that Defendants, within thirty (30) days after service of the judgment
15 demanded herein, are required to file with this Court and serve upon LS&Co.'s counsel a written
16 report under oath setting forth in detail the manner in which they have complied with the judgment;

17 8. Adjudge that LS&Co. recover from Defendants its damages and lost profits, and
18 Defendants' profits, in an amount to be proven at trial, as well as punitive damages under California
19 law;

20 9. Adjudge that Defendants are required to account for any profits that are attributable to
21 their illegal acts, and that LS&Co. be awarded (a) Defendants' profits and (b) all damages sustained
22 by LS&Co., under 15 U.S.C. § 1117, plus prejudgment interest;

23 10. Adjudge that the amounts awarded to LS&Co. pursuant to 15 U.S.C. § 1117 shall be
24 trebled;

25 11. Order an accounting of and impose a constructive trust on all of Defendants' funds
26 and assets that arise out of their infringing and dilutive activities;

27 12. Adjudge that LS&Co. be awarded its costs and disbursements incurred in connection
28 with this action, including LS&Co.'s reasonable attorneys' fees and investigative expenses; and

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DEMAND FOR JURY TRIAL

Levi Strauss & Co. demands that this action be tried to a jury.

Dated: June 11, 2026

Respectfully submitted,

VERSO LAW GROUP LLP

By: /s/ Sophy Tabandeh
Gregory S. Gilchrist
Ryan Bricker
Sophy Tabandeh
Kourtney Speer

Attorneys for Plaintiff
LEVI STRAUSS & CO.