

Exhibit C



LAW
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OF
CHRISTINE
KAROL
ROBERTS

CHRISTINE KAROL ROBERTS

In Association with Morland C. Fischer

P. O. BOX 9827
BAYVIEW CENTER
NEWPORT BEACH, CA 92658
TELEPHONE 949.854.8500
FACSIMILE 949.854.8535
INTERNET WEB SITE: www.ckrobertslaw.com
INTERNET E MAIL: ckroberts@attymail.com

*Licensed in California
and Texas*

March 31, 2000

Robert L. Raskopf, Esq.
White & Case
1155 Avenue of the Americas
New York, NY 10036

Re: **Hawaii-Pacific Apparel Group, Inc. - LIL DAWG POUND**
Registration No. 1,963,463 - March 19, 1996
and **DAWG POUND**, Application Serial No. 74/498198

Dear Mr. Raskopf:

I represent Hawaii-Pacific Apparel Group, Inc. of Hawaii and California. As you are aware, my client is the owner of various registered trademarks and pending applications which constitute a family of DAWG marks, hereinafter the "Marks.". In particular, my client is the owner of the above trademark registration for the trademark **LIL DAWG POUND** in International Class 25 for clothing, namely shirts, pants, shorts, jackets and swimwear; headwear, namely caps, hats, baseball caps and sherpa hats; and footwear, namely shoes, tennis shoes and work shoes, hereinafter referred to as the "Registration." Further, my client asserts both common law and statutory rights to the mark **DAWG POUND** which is the subject of Application Serial No. 74/498198, in International Class 25 for clothing, footwear and headgear.

Robert L. Raskopf, Esq.

March 31, 2000

Page 2

It has come to the attention of Hawaii-Pacific Apparel Group, Inc. that your clients, Cleveland Browns Football Company, LLC and/or your licensees or related entities are using the mark **DAWG POUND** in commerce through retail outlets and on the Internet on certain clothing items, such as t-shirts, which are covered by the Registration and my clients common law and statutory rights.

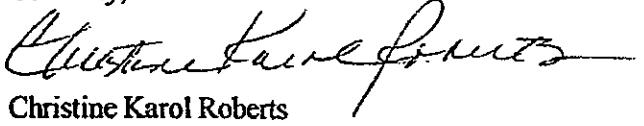
The names **DAWG POUND**, **LIL DAWG POUND**, **TOP DAWG** and Hawaii-Pacific Apparel Group, Inc.'s family of marks have become associated with Hawaii-Pacific Apparel Group, Inc. and its products. **DAWG POUND** and **LIL DAWG POUND** are employed by both the public and the clothing industry to refer to products marketed by Hawaii-Pacific Apparel Group, Inc. It is our position that your clients' use of the term **DAWG POUND** creates a likelihood of confusion with my client's Registration and its family of marks and, as such, constitutes trademark infringement, unfair competition and dilution of my client's family of marks.

On behalf of Hawaii-Pacific Apparel Group, Inc., we request that you immediately:

1. cease and desist using the mark **DAWG POUND** or any other trade identity designation containing any of Hawaii-Pacific Apparel Group, Inc.'s marks;
2. provide us with an accounting setting forth detailed information concerning the nature and volume of products you have sold bearing the term **DAWG POUND**;
3. terminate any existing license agreements with third parties which permit the use of the Marks in question including **DAWG POUND** and **LIL DAWG POUND**.
4. sign an agreement setting forth the terms on which this matter can be resolved, including payment of compensation to Hawaii-Pacific Apparel Group, Inc. for the damages arising from the above-described infringing activities of your clients.

If this matter is to be resolved amicably, we must have your compliance with the foregoing demands within ten (10) days of the date of this letter. We must receive your full cooperation with all of these demands, and any other that may become appropriate as we learn more about the nature of your infringing activities, or Hawaii-Pacific Apparel Group, Inc. will proceed to vigorously enforce its rights through the judicial system. I look forward to your early response to the matters discussed above.

Cordially,



Christine Karol Roberts

cc: Hawaii-Pacific Apparel Group, Inc.

Exhibit D



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FAX SIMILAR 949 834 8535
INTERNET WEB SITE www.ckroberts.com
INTERNET E MAIL: ckroberts@attmail.com

April 25, 2000

Logo Athletic, Inc.
8677 Logo Athletic Court
Indianapolis, IN 46219

Re: **Hawaii-Pacific Apparel Group, Inc. - LIL DAWG POUND**
Registration No. 1,963,463 - March 19, 1996
and **DAWG POUND**, Application Serial No. 74/498198

To whom it may concern,

I represent Hawaii-Pacific Apparel Group, Inc. of Hawaii and California. My client is the owner of various registered trademarks and pending applications which constitute a family of DAWG marks, hereinafter the "Marks.". In particular, my client is the owner of the above trademark registration for the trademark **LIL DAWG POUND** in International Class 25 for clothing, namely shirts, pants, shorts, jackets and swimwear; headwear, namely caps, hats, baseball caps and sherpa hats, and footwear, namely shoes, tennis shoes and work shoes, hereinafter referred to as the "Registration." Further, my client asserts both common law and statutory rights to the mark **DAWG POUND** which is the subject of Application Serial No. 74/498198, in International Class 25 for clothing, footwear and headgear.

Logo Athletic, Inc.

April 25, 2000

Page 2

It has come to the attention of Hawaii-Pacific Apparel Group, Inc. that your company may be manufacturing and distributing for sale items embodying the mark **DAWG POUND** in commerce through retail outlets and on the Internet, for example, on certain clothing items, such as t-shirts, which are covered by the Registration and my clients common law and statutory rights.

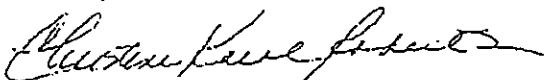
The names **DAWG POUND**, **LIL DAWG POUND**, **TOP DAWG** and Hawaii-Pacific Apparel Group, Inc.'s family of marks have become associated with Hawaii-Pacific Apparel Group, Inc. and its products. **DAWG POUND** and **LIL DAWG POUND** are employed by both the public and the clothing industry to refer to products marketed by Hawaii-Pacific Apparel Group, Inc. It is our position that your use of the term **DAWG POUND** creates a likelihood of confusion with my client's Registration and its family of marks and, as such, constitutes trademark infringement, unfair competition and dilution of my client's family of marks.

On behalf of Hawaii-Pacific Apparel Group, Inc., we request that you immediately:

1. cease and desist manufacturing and/or selling any items which embody and/or reflect the mark **DAWG POUND** or any other trade identity designation containing any of Hawaii-Pacific Apparel Group, Inc.'s marks;
2. provide us with an accounting setting forth detailed information concerning the nature and volume of products you have manufactured and sold bearing the term **DAWG POUND**;
3. terminate any existing license agreements with third parties which permit the use of the Marks in question including **DAWG POUND** and **LIL DAWG POUND**.
4. sign an agreement setting forth the terms on which this matter can be resolved, including payment of compensation to Hawaii-Pacific Apparel Group, Inc. for the damages arising from the above-described infringing activities of your clients.

If this matter is to be resolved amicably, we must have your compliance with the foregoing demands within ten (10) days of the date of this letter. We must receive your full cooperation with all of these demands, and any other that may become appropriate as we learn more about the nature of your infringing activities, or Hawaii-Pacific Apparel Group, Inc. will proceed to vigorously enforce its rights through the judicial system. I look forward to your early response to the matters discussed above.

Cordially,



Christine Karol Roberts

cc: Hawaii-Pacific Apparel Group, Inc.

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INTERNET WEB SITE: www.ckrobertslaw.com
INTERNET E MAIL: ckroberts@attymail.com

April 25, 2000

Puma North America, Inc.
5 Lyberty Way
Westford, MA 01886

Re: Hawaii-Pacific Apparel Group, Inc. - **LIL DAWG POUND**
Registration No. 1,963,463 - March 19, 1996
and **DAWG POUND**, Application Serial No. 74/498198

To whom it may concern:

I represent Hawaii-Pacific Apparel Group, Inc. of Hawaii and California. My client is the owner of various registered trademarks and pending applications which constitute a family of **DAWG** marks, hereinafter the "Marks.". In particular, my client is the owner of the above trademark registration for the trademark **LIL DAWG POUND** in International Class 25 for clothing, namely shirts, pants, shorts, jackets and swimwear; headwear, namely caps, hats, baseball caps and sherpa hats; and footwear, namely shoes, tennis shoes and work shoes, hereinafter referred to as the "Registration." Further, my client asserts both common law and statutory rights to the mark **DAWG POUND** which is the subject of Application Serial No. 74/498198, in International Class 25 for clothing, footwear and headgear.

000228

Puma North America, Inc.

April 25, 2000

Page 2

It has come to the attention of Hawaii-Pacific Apparel Group, Inc. that your company may be manufacturing and distributing for sale items embodying the mark **DAWG POUND** in commerce through retail outlets and on the Internet, for example, on certain clothing items, such as t-shirts, which are covered by the Registration and my clients common law and statutory rights.

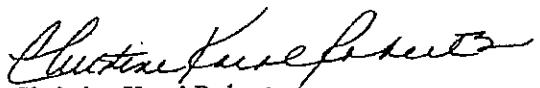
The names **DAWG POUND**, **LIL DAWG POUND**, **TOP DAWG** and Hawaii-Pacific Apparel Group, Inc.'s family of marks have become associated with Hawaii-Pacific Apparel Group, Inc. and its products. **DAWG POUND** and **LIL DAWG POUND** are employed by both the public and the clothing industry to refer to products marketed by Hawaii-Pacific Apparel Group, Inc. It is our position that your use of the term **DAWG POUND** creates a likelihood of confusion with my client's Registration and its family of marks and, as such, constitutes trademark infringement, unfair competition and dilution of my client's family of marks.

On behalf of Hawaii-Pacific Apparel Group, Inc., we request that you immediately:

1. cease and desist manufacturing and/or selling any items which embody and/or reflect the mark **DAWG POUND** or any other trade identity designation containing any of Hawaii-Pacific Apparel Group, Inc.'s marks;
2. provide us with an accounting setting forth detailed information concerning the nature and volume of products you have manufactured and sold bearing the term **DAWG POUND**;
3. terminate any existing license agreements with third parties which permit the use of the Marks in question including **DAWG POUND** and **LIL DAWG POUND**.
4. sign an agreement setting forth the terms on which this matter can be resolved, including payment of compensation to Hawaii-Pacific Apparel Group, Inc. for the damages arising from the above-described infringing activities of your clients.

If this matter is to be resolved amicably, we must have your compliance with the foregoing demands within ten (10) days of the date of this letter. We must receive your full cooperation with all of these demands, and any other that may become appropriate as we learn more about the nature of your infringing activities, or Hawaii-Pacific Apparel Group, Inc. will proceed to vigorously enforce its rights through the judicial system. I look forward to your early response to the matters discussed above.

Cordially,



Christine Karol Roberts

cc: Hawaii-Pacific Apparel Group, Inc.

000229

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FACSIMILE 949.854.8535
INTERNET WEB SITE: www.ckrobertslaw.com
INTERNET E MAIL: ckroberts@attymail.com

April 25, 2000

Lee Sport
c/o VF Knitwear
P. O. Box 5423 - Walker Road
Martinsville, VA 24115-5423

Re: Hawaii-Pacific Apparel Group, Inc. - **LIL DAWG POUND**
Registration No. 1,963,463 - March 19, 1996
and **DAWG POUND**, Application Serial No. 74/498198

To whom it may concern:

I represent Hawaii-Pacific Apparel Group, Inc. of Hawaii and California. My client is the owner of various registered trademarks and pending applications which constitute a family of **DAWG** marks, hereinafter the "Marks.". In particular, my client is the owner of the above trademark registration for the trademark **LIL DAWG POUND** in International Class 25 for clothing, namely shirts, pants, shorts, jackets and swimwear; headwear, namely caps, hats, baseball caps and sherpa hats; and footwear, namely shoes, tennis shoes and work shoes, hereinafter referred to as the "Registration." Further, my client asserts both common law and statutory rights to the mark **DAWG POUND** which is the subject of Application Serial No. 74/498198, in International Class 25 for clothing, footwear and headgear.

000230

Lee Sport
April 25, 2000
Page 2

It has come to the attention of Hawaii-Pacific Apparel Group, Inc. that your company may be manufacturing and distributing for sale items embodying the mark **DAWG POUND** in commerce through retail outlets and on the Internet, for example, on certain clothing items, such as t-shirts, which are covered by the Registration and my clients common law and statutory rights.

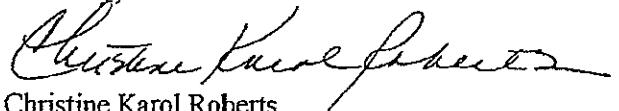
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On behalf of Hawaii-Pacific Apparel Group, Inc., we request that you immediately:

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2. provide us with an accounting setting forth detailed information concerning the nature and volume of products you have manufactured and sold bearing the term **DAWG POUND**;
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If this matter is to be resolved amicably, we must have your compliance with the foregoing demands within ten (10) days of the date of this letter. We must receive your full cooperation with all of these demands, and any other that may become appropriate as we learn more about the nature of your infringing activities, or Hawaii-Pacific Apparel Group, Inc. will proceed to vigorously enforce its rights through the judicial system. I look forward to your early response to the matters discussed above.

Cordially,



Christine Karol Roberts

000231

 Copyright

Search Records Results

Registered Works Database (Registration Number Search)

Search For:

VA-578-904 (COHM)

Title: Rottweiler, the rage.

Description: Silk-screen design.

Claimant: acHawaii Pacific Apparel Group, Inc.

Created: 1991

Published: 8Oct91

Registered: 13Jul93

Special Codes: 5/S

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Washington, D.C. 20559-6000
(202) 707-3000



Search Records Results

Registered Works Database (Registration Number Search)

Search For:

VA-783-281 (COHM)

Title: Dawg pound.

Description: Silkscreen.

Claimant: acHawaii Pacific Apparel Group, Inc.

Created: 1995

Published: 4Sep95

Registered: 17Jun96

Title on © Application: Dawg pound (football design)

Special Codes: 5/S

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Copyright

Search Records Results

Registered Works Database (Registration Number Search)

Search For:

VA-783-326 (COHM)

Title: Make room 4 the dawg.

Description: Silkscreen.

Claimant: acHawaii Pacific Apparel Group, Inc.

Created: 1995

Published: 28Jun95

Registered: 8May96

Special Codes: 5/S

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 Copyright

Search Records Results

Registered Works Database (Registration Number Search)

Search For:

VA-783-317 (COHM)

Title: On deadly ground.

Description: Silkscreen.

Claimant: acHawaii Pacific Apparel Group, Inc.

Created: 1994

Published: 31May94

Registered: 8May96

Special Codes: 5/S

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Search Records Results

Registered Works Database (Registration Number Search)

Search For:

VA-783-313 (COHM)

Title: Bone crushin'.

Description: Silkscreen.

Claimant: acHawaii Pacific Apparel Group, Inc.

Created: 1994

Published: 28Jun94

Registered: 8May96

Special Codes: 5/S

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Search Records Results

Registered Works Database (Registration Number Search)

Search For:

VA-789-411 (COHM)

Title: Bratty 1.

Description: Silkscreen on T-shirt.

Claimant: acHawaii Pacific Apparel Group, Inc.

Created: 1995

Published: 24May95

Registered: 20May96

Title on © Application: Braity 1.

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Search Records Results

Registered Works Database (Registration Number Search)

Search For:

VA-783-306 (COHM)

Title: Power play.

Description: Silkscreen.

Claimant: acHawaii Pacific Apparel Group, Inc.

Created: 1995

Published: 15Feb95

Registered: 8May96

Special Codes: 5/S

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Search Records Results

Registered Works Database (Registration Number Search)

Search For:

VA-783-308 (COHM)

Title: Totally ripped.

Description: Silkscreen.

Claimant: acHawaii Pacific Apparel Group, Inc.

Created: 1995

Published: 15Mar95

Registered: 8May96

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Copyright

Search Records Results

Registered Works Database (Registration Number Search)

Search For:

VA-783-304 (COHM)

Title: Down under.

Description: Silkscreen.

Claimant: acHawaii Pacific Apparel Group, Inc.

Created: 1995

Published: 22Mar95

Registered: 8May96

Special Codes: 5/S

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Copyright

Search Records Results

Registered Works Database (Registration Number Search)

Search For:

VA-788-390 (COHM)

Title: Dawg pound.

Description: Art reproduction.

Claimant: acHawaii Pacific Apparel Group, Inc.

Created: 1995

Published: 29Sep95

Registered: 14Jun96

Title on © Application: Sleeve print Dawg.

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Copyright

Search Records Results

Registered Works Database (Registration Number Search)

Search For:

VA-894-183 (COHM)

Title: Dawg pound.

Description: Silk screen.

Note: Add. ti.: Dawg pound logo (short)

Claimant: acHawaii Pacific Apparel Group, Inc.

Created: 1995

Published: 3Nov95

Registered: 17Jun96

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 Copyright

Search Records Results

Registered Works Database (Registration Number Search)

Search For:

VA-783-314 (COHM)

Title: Unlawful entry.

Description: Silkscreen.

Claimant: acHawaii Pacific Apparel Group, Inc.

Created: 1994

Published: 14Jun94

Registered: 8May96

Special Codes: 5/S

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Search Records Results

Registered Works Database (Registration Number Search)

Search For:

VA-788-389 (COHM)

Title: Dawg pound.

Description: Art reproduction.

Claimant: acHawaii Pacific Apparel Group, Inc.

Created: 1995

Published: 28Sep95

Registered: 14Jun96

Title on © Application: Sleeve print Dawg crown.

Special Codes: 5/S

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Copyright

Search Records Results

Registered Works Database (Title Search)

Search For: DAWG POUND FOOTBALL JERSEY

Item 1 of 1

1. Registration Number: VA-788-396

Title: Dawg pound.

Description: Art reproduction.

Claimant: acHawaii Pacific Apparel Group, Inc.

Created: 1995

Published: 11Oct95

Registered: 14Jun96

Title on © Application: Dawg pound football jersey.

Special Codes: 5/S

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(202) 707-3000



Search Records Results

Registered Works Database (Registration Number Search)

Search For:

VA-789-416 (COHM)

Title: King of the turf.

Description: Silkscreen on T-shirt.

Claimant: acHawaii Pacific Apparel Group, Inc.

Created: 1995

Published: 3Nov95

Registered: 20May96

Special Codes: 5/S

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RUSH

SPECIAL EVENTS
HOT MARKET

ARTIST: BM

DATE SUBMITTED: 09-30-98

REVISED BY: _____

DATE REVISED AND RESUBMITTED: _____

APPROVALS

- QUALITY CONTROL: *QC 10/*
- ART DIRECTOR: *ANP/1*
- L.C./V.P. APPROVAL: *APPROVED*
- APPROVED: *APPROVED*
- APPROVED W/CHANGES: *APPROVED*
- REJECTED/PLEASE RESUBMIT: _____

PMS COLORS:

- 1) WHITE
- 2) 466
- 3) 436
- 4) 492
- 5) 172
- 6) 497
- 7) BLACK
- 8)
- 9)
- 10)
- 11)

JOB INFORMATION

CODE: 7C-X9C

TEAM NAME: CLEVELAND BROWNS

GRAPHIC NAME: BAD DAWG

GARMENT COLOR: S

GARMENT STYLE: C980/C780

EMBROIDERY



* SPECIAL COMMENTS: _____

V1

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