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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.

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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.

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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:

- 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.