

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

V.V.V. & Sons Edible Oils Limited v. Meenakshi Overseas LLC

V.V.V. & Sons Edible Oils · No. 2:14-cv-02961-DJC-CKD · Decided June 3, 2025

SUMMARY

The United States District Court for the Eastern District of California denied both parties’ cross-motions for summary judgment in a trademark dispute concerning the IDHAYAM mark for sesame oil. The court rejected the defendant’s laches defense, finding no unreasonable delay for most claims and no demonstrated prejudice, but also concluded that the plaintiff had not clearly established priority of use, precluding summary judgment on claims involving fraud in procurement, trademark infringement, and unfair competition.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Daniel J. Calabretta
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	June 3, 2025
DOCKET	2:14-cv-02961-DJC-CKD
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for partial summary judgment on claims for fraud in the procurement, trademark infringement, and unfair competition. Defendant cross-moved for summary judgment based on laches. The district court denied both motions.
STANDARD OF REVIEW	Summary judgment is appropriate when the evidence shows no genuine dispute of material fact and the moving party is entitled to judgment as a matter of law. The court must view the evidence and draw reasonable inferences in favor of the nonmoving party, while credibility determinations, weighing evidence, and drawing legitimate inferences remain jury functions.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	V.V.V. & Sons Edible Oils Limited v. Meenakshi Overseas LLC

TOPICS

trademark infringement

summary judgment

affirmative defenses

civil procedure

commercial litigation

PRACTICE AREAS

trademark law

trademark infringement

civil procedure

commercial litigation

intellectual property

QUESTIONS PRESENTED

1. Whether Defendant established laches sufficient to obtain summary judgment on Plaintiff's claims.
2. Whether Plaintiff's claims for trademark infringement and unfair competition were subject to a four-year analogous California limitations period for laches purposes.
3. Whether Plaintiff established priority of use and ownership of the IDHAYAM mark sufficiently to obtain summary judgment on its trademark infringement and unfair competition claims.
4. Whether Plaintiff established the elements of fraud in the procurement of Defendant's trademark registration sufficiently to obtain summary judgment.
5. Whether Plaintiff's Indian trademark rights and Defendant's importation of sesame oil from India established that Defendant lacked a bona fide intent to use the mark or committed fraud in procuring its United States registration.

HOLDINGS

1. Defendant was not entitled to summary judgment on laches because, although Plaintiff's fraud claim was arguably delayed beyond the analogous limitations period, Defendant failed to establish prejudice caused by Plaintiff's delay.
2. The filing of Defendant's intent-to-use application alone did not establish the date on which Plaintiff should have known of Defendant's use in commerce; the operative constructive-knowledge date was August 2, 2011, when Defendant's federal registration issued after its statement of use.
3. Plaintiff was not entitled to summary judgment on its trademark infringement and unfair competition claims because it failed to establish priority of use and ownership of the IDHAYAM mark in the United States.
4. Plaintiff was not entitled to summary judgment on its fraud-in-the-procurement claim because the evidence did not establish that Defendant knowingly made a false material representation concerning a clearly established superior United States trademark right.
5. Plaintiff's reliance on 15 U.S.C. § 1124 and the TRIPS treaty did not establish that Defendant lacked a bona fide intent to use the IDHAYAM mark or that Plaintiff's unregistered Indian trademark rights controlled in the United States.

KEY QUOTATIONS

“In short, there is insufficient evidence Gandhi made any knowing misrepresentation of material fact when prosecuting the trademark application for IDHAYAM.”

“Under the applicable four-year statute of limitations, these claims were timely, as they were brought on December 23, 2014, within four years of when the 654 Registration was issued on August 2, 2011.”

“To acquire ownership of a trademark it is not enough to have invented the mark first or even to have registered it first; the party claiming ownership must have been the first to actually use the mark in the sale of goods or services.”

FACTUAL BACKGROUND

Both parties sell sesame oil in the United States under the IDHAYAM mark. Defendant began selling under the mark in January 2008, filed an intent-to-use application in 2009, and obtained federal Registration No. 4,006,654 in 2011. Plaintiff claimed priority through its Indian company and predecessor's alleged United States sales, but the record disputed whether United States trademark rights and associated goodwill were assigned from the predecessor to Plaintiff. Plaintiff opposed Defendant's application in 2009 but abandoned the opposition, then filed this action in December 2014.

PROCEDURAL HISTORY

Plaintiff filed suit in 2014 concerning Defendant's IDHAYAM trademark registration and asserted federal and state trademark-related claims. Claims concerning two other Defendant registrations were dismissed with prejudice, and the parties stipulated to dismissal of dilution claims. After discovery, Plaintiff moved for partial summary judgment and Defendant cross-moved for summary judgment on laches; the court held a hearing and denied both motions because Plaintiff had not established priority of use and Defendant had not shown the elements necessary for laches.

DISPOSITION

other

CASES CITED

- Celotex Corp. v. Catrett, 477 U.S. 317, 323, 325 (1986)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 250-52, 255 (1986)
- Matsushita Elec. Indus. Co. v. Zenith Radio Corp., 475 U.S. 574, 585-88 (1986)
- T.W. Elec. Serv., Inc. v. Pac. Elec. Contractors Ass'n, 809 F.2d 626, 631 (9th Cir. 1987)
- Jarrow Formulas, Inc. v. Nutrition Now, Inc., 304 F.3d 829, 835, 837-38 (9th Cir. 2002)
- Fitbug Ltd. v. Fitbit, Inc., 78 F. Supp. 3d 1180, 1186, 1189-90 (N.D. Cal. 2015)
- Danjaq LLC v. Sony Corp., 263 F.3d 942, 951, 955 (9th Cir. 2001)
- La Quinta Worldwide LLC v. Q.R.T.M., S.A. de C.V., 762 F.3d 867, 878 (9th Cir. 2014)
- E-Systems, Inc. v. Monitek, Inc., 720 F.2d 604, 607 (9th Cir. 1983)
- Pinkette Clothing, Inc. v. Cosmetic Warriors, Ltd., 894 F.3d 1015, 1023, 1025 (9th Cir. 2018)
- Pharmacia Corp. v. Alcon Labs., Inc., 201 F. Supp. 2d 335, 383, 385 (D.N.J. 2002)
- Adidas Am., Inc. v. TRB Acquisitions LLC, 2018 WL 4855484, at *5 & n.2 (D. Or. Oct. 5, 2018)

- United Am. Indus. v. Cumberland Packing Corp., 2007 WL 38279, at *3 (D. Ariz. Jan. 4, 2007)
- Karl Storz Endoscopy Am., Inc. v. Surgical Techs., Inc., 285 F.3d 848, 853 (9th Cir. 2002)
- Miller v. Glen Miller Productions, Inc., 454 F.3d 975, 980-81, 997 (9th Cir. 2006)
- Kling v. Hallmark Cards Inc., 225 F.3d 1030, 1036 (9th Cir. 2000)
- Aguila Mgmt. LLC v. Int'l Fruit Genetics LLC, 2020 WL 736303, at *2-3 (D. Ariz. Feb. 13, 2020)
- Shouse v. Pierce County, 559 F.2d 1142, 1147 (9th Cir. 1977)
- Zamora v. Napolitano, 2009 WL 10692976, at *2 (E.D. Cal. Aug. 6, 2009)
- Boone v. Mech. Specialties Co., 609 F.2d 956, 958 (9th Cir. 1979)
- Internet Specialties W., Inc. v. Milon-DiGiorgio Enters., Inc., 559 F.3d 985, 990 n.2, 991-92 (9th Cir. 2009)
- Tisch Hotels, Inc. v. Americana Inn, Inc., 350 F.2d 609, 615 (7th Cir. 1965)
- Quicksilver, Inc. v. Kymsta Corp., 466 F.3d 749, 755 (9th Cir. 2006)
- L.D. Kichler Co. v. Davoil, Inc., 192 F.3d 1349, 1351 (Fed. Cir. 1999)
- Robi v. Five Platters, 918 F.2d 1439, 1444 (9th Cir. 1990)
- Hana Fin., Inc. v. Hana Bank, 398 F. App'x 257, 259 (9th Cir. 2010)
- Grupo Gigante SA De CV v. Dallo & Co., Inc., 391 F.3d 1088, 1093-98 (9th Cir. 2004)
- Philip Morris U.S.A. Inc. v. Castworld Prods., 219 F.R.D. 494, 500 (C.D. Cal. 2003)
- S. Cal. Darts Ass'n v. Zaffina, 762 F.3d 921, 929 (9th Cir. 2014)
- 6th St. Partners, LLC v. Priese Bd., 2022 WL 1570630, at *5 (C.D. Cal. Mar. 17, 2022)
- Novalogic, Inc. v. Activision Blizzard, 41 F. Supp. 3d 885, 904 (C.D. Cal. 2013)
- Sengoku Works Ltd. v. RMC Int'l, Ltd., 96 F.3d 1217, 1219-20 (9th Cir. 1996)
- eMachines, Inc. v. Ready Access Memory, 2001 WL 456404, at *11 (C.D. Cal. Mar. 5, 2001)
- Russell Rd. Food & Bev., LLC v. Spencer, 829 F.3d 1152, 1156 (9th Cir. 2016)
- E. & J. Gallo Winery v. Pasatiempos Gallo, S.A., 705 F. Supp. 1403, 1415 (E.D. Cal. 1994)