
| RESEARCH ARTICLE

Trademark Protection Systems: A Comparative Study of China and Selected Arab Laws

Jehad K. A. Alshaikheid¹ and Ahd S. I. Alabeed²

¹ School of Law, Central South University, Changsha 41008, China

² Faculty of Legal, Economic and Social Sciences in Mohammedia, Hassan II University of Casablanca, Casablanca. Morocco

Corresponding Author: Jehad K. A. Alshaikheid. **E-mail:** jhdkhalid96@gmail.com

| ABSTRACT

Trademark is considered one of the most prominent and important forms of intellectual property in the international economy. It is not limited to being a symbol for products and services but also serves as a means of communication and connection between producers and consumers in the global market. This article presents a comparative study of the trademark protection system in China and some Arab countries (the United Arab Emirates, the Kingdom of Saudi Arabia, and Jordan). In addition to the historical evolution of trademark laws, it focuses on the similarities and differences in the principles of registration (priority), the scope of trademark protection, registration procedures, mechanisms for the protection of well-known marks, and the penalties imposed for infringement. The significance of this study lies in addressing a noticeable gap in research that brings together the Chinese system with Arab systems. It further serves as an academic guide for advising decision-makers, legal professionals, and companies operating in these rapidly growing markets.

| KEYWORDS

Trademark protection, intellectual property, legal systems, Trademark, comparative study, intellectual property rights.

| ARTICLE INFORMATION

ACCEPTED: 01 March 2026

PUBLISHED: 09 March 2026

DOI: 10.32996/ijlps.2026.8.3.2

1. Introduction

Trademarks represent a fundamental pillar of the contemporary global economy. It is not merely a symbol for products and services but also serves as a means of communication between producers and consumers. It functions as the identity of the products, goods, and services offered to the public, influencing consumer confidence in the product and eliminating any confusion that may be caused by other companies to the consumer. For this reason, producers aim to differentiate their goods through either the selection or development of a unique trademark, which, at its core, is designed to add value to the goods it represents. Trademarks provide value not only for companies and producers - by protecting the property they are using in the form of a trademark - but for consumers as well by providing them with a reliable option. When companies are confident their trademarks are protected, they show more willingness to invest in quality products and services, which in turn positively affect other stakeholders in the economy. This process contributes to the development of a fair and robust market, where competition, innovation, and creativity create benefits for both companies and consumers.

The markets of the Middle East are witnessing an increasing engagement of Chinese companies and products, as a lot of this is driven by the energy surrounding the Belt and Road Initiative, which has connected trade and investments. The study aims to provide both Arab and Chinese companies with a practical legal framework for entering or expanding in the markets of these countries, highlighting the points of similarity and divergence among these four legal frameworks.

Methodologically, this study adopts a comparative analysis approach to compare trademark protection systems in China, the United Arab Emirates, the Kingdom of Saudi Arabia, and Jordan. The four jurisdictions were selected based on market size, the recency of their legislative frameworks, the availability of published case law, and the diversity of legal models, to ensure a practically relevant comparative spread: China offers a model with strict procedural priority and a rich judicial record in combating bad-faith filings; the UAE and Saudi Arabia embody a newly updated legislative generation in the Arab region, with

an expanded scope that includes non-traditional marks and tangible improvements in examination speed; whereas Jordan allows observation of the impact of judicial interpretation on balancing registration and use.

2. From Early Regulation to International Harmonization : The Evolution of Trademark Law

The United Arab Emirates initiated the regulation of trademark rights through Federal Law No. 37 of 1992, which represented the basic structure for the trademark protection system in the Emirates. This law is concerned with procedural aspects of trademark registration and protection against infringements, creating for owners of trademarks the right to guard their intellectual property from illegal exploitation (Schackel, 1993).

The law was amended in 2002 by Law No. 8, which increased the legal protection of trademarks and extended their ambit in accordance with the provisions of international standards, such as the TRIPS Agreement. It contributed further to harmonization of the laws relating to intellectual property protection at global levels. In 2021 a Federal Decree-Law No. 36 of 2021 on Trademarks was issued in substitution of earlier laws, to provide for necessity for further amendments of the laws intended to enhance protection of trademarks in the UAE to the extent of introducing further categories of trademarks such as sound marks and olfactory marks in line with modern developments of global trends with regard to protection of intellectual property (Daudpota, 2025).

Similarly, great developments took place in the law concerning protection of trademarks in the Kingdom of Saudi Arabia. The first Trademark Regulation was published in 1939 and was the first basis in the Kingdom for an orderly system of controlling and protecting trademarks. In 1984, Royal Decree No. 33 was further enacted, revising the earlier practice, in order to keep pace with the advance in the business and other affairs of the Country (Alrdaan R. F., 2021).

In 2002 Royal Decree No. M/21 was next published to replace the preceding law, the law regarding trademarks having increased. The definition of trademarks was extended to include, in principle, non-traditional trademarks. This amended law as part of a series of legislative changes directed towards bringing the laws of the Country into line with international standards such as the TRIPS Agreement which insist upon more extended protection of intellectual property rights. Conversely, the Kingdom of Saudi Arabia acceded in 2014 to the Unified GCC Trademark Law, which became effective in 2016, thus furthering uniformity and improving the law as to trademarks in the various states of the GCC (Bou Khater, 2018).

In addition to the GCC framework, the Hashemite Kingdom of Jordan began to govern trademark rights by means of Law No. 33 of 1952, which formed the basis for trademark protection in the Kingdom. The legislation was thereafter changed, in accordance with the requirements of the accession of Jordan to the World Trade Organization and in compliance with the TRIPS Agreement, by Law No. 34 of 1999, in order to align the national framework with the provisions of the Agreement (Alshunnaq, 2021). Furthermore, another amendment was introduced by means of Law No. 15 of 2008, which also concentrated on introducing further procedural improvements and clarifying rights, to strengthen the legal framework and ensure the compliance of laws with international developments.

In an Asian comparative context, the modern legislative framework in China was established with the promulgation of the Trademark Law in 1982, which entered into force in 1983, posing itself as the basis governing trademarks. Since then, and up to 2021, the law has undergone major amendments on four occasions up within a continuous interaction between China and the member states of the international trademark treaties, reflecting a shift in policy from passive acceptance to active innovation (Hang, 2022).

The first amendment in 1993 increased the scope of criminality related to the circulation of imitations and more severe penalties were put into place with the object of preventing infringements of the trademark. The second amendment in 2001 brought the legislation into line with the conditions of admission to the WTO and TRIPS by rendering necessary those elements of the mark which were statute, three-dimensional marks and physical combinations. The third amendment in 2013 augmented the strength of trademarks, the division of jurisdiction between administrative bodies and the courts of law remaining, and took a further step forward towards application as being inevitably passive in regard to resolution of questions by way of maxims of national objectives.

In 2019, the fourth amendment was enacted, which rendered it imperative to refuse "bad faith" applications pertaining to non-protectable applications, with the object of increasing the purity of the register and to prevent subsequent imposition of harm. In the same light, the amendment of 2019 laid down strictures on the agencies of filing against bad faith applications as well as increased the penalties for such actions of punitive damage from (1–3) to (1–5) times in order to enhance the deterrent element. (Tang, 2023).

3. Trademark Registration Systems: First-to-File vs. Prior Use Approaches

It is observed that the four countries share similarities in trademark registration system, with some differences in detail:

In the United Arab Emirates, Art.11 of Federal Law No. 36 of 2021 provides that the general principle governing registration is first-to-file, as the law does not require prior use of the mark for its registration. However, the law has established a balance between first-to-file principle in registration and prior use principle (Yas, 2024). Art.18 of the same law expressly states that the prior user may seek invalidation of the later registration on relative grounds before the competent trademark authority (the Ministry of Economy), within five years of the registration date, except in cases of bad faith. Separately, revocation for non-use

may be sought where the registered mark has not been used for the statutory period (five years), regardless of prior-use issues. An exception also appears in that the prior user's right to challenge a later registration is precluded where express or implicit consent to that registration is established. The existence of this exception prevents misuse of rights by the prior user. Thus, it can be concluded that the Emirati legislature balances first-to-file principle with prior-user protection, subject to clear time limits and bad-faith exceptions.

In contrast, the Kingdom of Saudi Arabia follows first-to-file principle as it relates to registration under Art.7 of the Trademark Law of the Gulf Cooperation Council (a unified law at the GCC level, applied locally in Saudi Arabia). It is similar to the Emirati law in balancing and explicitly protecting between first-to-file principle and prior use principle, particularly in filing an invalidation request. However, one distinction exists: the request must be submitted before the competent court within five years (Issa, 2024) as it is a judicial procedure, which may require more time and higher costs compared to the Emirati law. Accordingly, it appears that Saudi Arabia adopts the Emirati approach, with a difference in the mechanism of challenge.

Jordan adopts first-to-file principle in registration pursuant to art 15 of the Trademarks Law No. (33) of 1952 as amended in 2008. Although not expressly stated, Art.15 establishes that the date of registration is the date on which legal protection commences, thereby making Art.15 the primary reference for the principle of registration priority.

Unlike the explicit provisions under Emirati and Saudi law, the Jordanian law grants an implicit right to the prior user without setting a specific time limit to file invalidation of a registered trademark, provided that sufficient documents are submitted to convince the competent court that he is the true owner of the mark by virtue of his prior use (Hmaidan, 2025). Furthermore, Art.22 of the same law provides that any interested person may request an invalidation of a trademark in case of non-use for three years, unless the owner of the mark proves that the non-use was due to special commercial circumstances (Al-Khashrum, 2005). Thus, it indicates that Jordanian law grants the prior user a broader scope to challenge registration, linking the protection of the trademark more closely to actual use.

China is characterized by strictness in trademark registration. Art.31 of the Trademark Law of the People's Republic of China firmly confirms that the governing principle is first-to-file, with the exception that if two applications are filed on the same day, preference shall be given to the applicant who first used the mark. It is also noted that Art.31 of the same law prohibits the registration of a mark where the application is made in bad faith. This demonstrates that China has adopted a more rigid position, making registration priority the general rule with only limited exceptions (Lee, 2020).

It is therefore clear that the four countries fundamentally rely on the principle of registration priority, yet there are distinct differences regarding the scope of protection afforded to the prior user, the mechanisms of appeal, and the applicable timeframes. While the UAE and Saudi Arabia strive to achieve a balance between registration priority and prior use within defined time limits, Jordan presents a more flexible approach in favor of the prior user, whereas China maintains a stricter stance focused primarily on registration priority.

4. Defining the Scope of Trademark Protection: Traditional and Non-Traditional Marks

The definition of trademarks sets the boundaries of the protection granted to them; what is not included in the definition is not covered by legal protection. Examining the trademark laws in the four jurisdictions under study reveals significant divergence: some adopt a limited traditional approach, while others adopt a broader one.

The Jordanian approach considered limited because the Jordanian Trademarks Law No. 33 of 1952, as amended by Law No. 15 of 2008, defines a trademark in Art.2 as "Any visible sign." This means non-traditional marks are excluded, and thus are not compatible with current global standards adopted by the TRIPS Agreement which lists categories of marks, and left the scope open to a judicial interpretation or a trademark registrar, which can create ambiguity in protecting trademark. The same article also defined a "well-known trademark," reflecting the legislature intention to provide special protection to this category in line with international standards.

While China, representing an intermediate approach, defines a trademark under the amended 2019 Trademark Law in Art.8 as any sign capable of distinguishing goods, and it explicitly includes words, designs, three-dimensional marks, colors, and sounds, but excludes olfactory (scent) and holograms. This makes it less comprehensive than the Emirati and Saudi laws. The definition emphasizes the function and essential purpose more than the physical form. With regard to the United Arab Emirates, pursuant to Federal Law No. 36 of 2021 Art.2, a more progressive approach was taken to the definition of marks by providing a detailed list that expressly identifies both traditional and non-traditional marks such as olfactory (scent), sound, and holograms, and it is even more detailed than the TRIPS definition.

Likewise, Saudi Arabia similarly included non-traditional marks such as sound and olfactory (scent) in Art.2 of the Trademark Law of the Gulf Cooperation Council (in effect in Saudi Arabia), providing a detailed definition of what may constitute a trademark. This confirms consistency with the definition in the TRIPS Agreement with even more inclusivity in certain aspects. It reflects the intent of Gulf legislatures to keep pace with modern marketing methods.

5. Trademark Registration Procedures: A Vital Step for Protection

In the United Arab Emirates, trademark registration application is filed with the Ministry of Economy, the application must meet the condition and procedures specified by the executive regulation of the law, the legislature has set a period of 90 days to

examine the application to verify that the requested registration mark is not included in the marks prohibited from registration mentioned in Art.3 of the Law, review, and decision on a trademark registration application (Al-Tawalbeh, 2024), which is a relatively short timeframe. The law also permits the filing of a multi-class application under the Nice Classification, which reduces administrative burdens.

As for Saudi Arabia trademark law, trademark registration application is submitted on the website of the Saudi Authority for Intellectual Property(Makhlouf, 2019), Art.12, para 4 sets a 90 days' timeframe for the trademark registrar to decide on a registration application which is similar to the UAE law. Moreover, Saudi Arabia legal system permits a multi-class application, but with separate fees for each category, which slightly reduces the advantage.

In contrast, Chinese Trademark Law requires trademark registration applications to be filed with the China National Intellectual Property Administration (CNIPA). The registration process is, therefore, relatively longer, which includes rigorous and thorough examination within a prescribed period of nine months. The Chinese Trademark Law, similar to the Emirati system, however, allows for multi-class applications, thus saving time and cost(Jewell, 2016).

With Jordan, the legal system does not have specific or mandatory timeframes for the trademark registrar(Mohammed, 2021), which provides flexibility to the trademark registrar but reduces efficiency. Regarding the multi-class application Jordan law does not include an explicit provision permitting a multi-class application, resulting in added costs and bureaucracy, which is not keeping pace with modern progress.

Trademark registration laws and procedures vary on a country-to-country basis. The UAE and Saudi Arabia include different laws with exceptional speed and efficiency for trademark registration, while China presents a relatively longer process. Jordan law provide flexibility; however, the absence of clear timelines may present an obstacle for the companies trying to register their trademarks. Given the noted differences outlined, companies working in these jurisdictions must consider the distinctions outlined when registering a trademark.

6. Protection of Registered and Well-Known Trademarks

Protection is limited to registered trademarks only, as unregistered trademarks do not have protection. The four legislations agree on a ten-year protection period, renewable for an equivalent term, in compliance with applicable international standards.

However, both the Paris Convention and the TRIPS Agreement, to which four countries under comparison is party, require member states to protect well-known trademarks even if they are not registered or used in a state, as all four countries under comparison provide strong protection for such marks, albeit through different mechanisms.

The Emirati law grants broad protection to well-known marks even if they are not registered, with the aim of attracting investors and ensuring the prevention of consumer deception(Zobel, 2008). A well-known trademark in UAE is determined based on the standard of public recognition, advertising expenditures, and the extent of its regional reach.

While The Saudi law, embodied in the Unified Trademark Law of the GCC States, provides similar exceptional protection to that afforded in the UAE, A well-known trademark in Saudi Arabia is determined based on the well-known status of a trademark is defined by the extent of public recognition of the mark through intensive advertising, the number of countries in which the trademark is well-known or its official place of registration, as well as the value of the trademark and the extent of its contribution to the sale of the products or services it represents(Alrdaan R. F., 2021).

In China, despite its strict adherence to the principle of registration priority, a structured procedural approach is followed to grant special protection to well-known trademarks. Applications for registration are refused where the mark is proven to be well-known, and this protection extends to non-traditional marks as well. China has developed both judicial and administrative mechanisms for the protection of well-known trademarks, with well-known status being established as a factual matter in each individual case. Thus, the assessment is conducted on a case-by-case basis(Luo, 2009). The case *Lacoste S.A. v. Crocodile International Pte Ltd*(Lacoste S.A. v Crocodile International Pte Ltd, 2009) serves as a prominent example, where the court relied on evidence of extensive use and advertising to rule that the 'Lacoste' mark was well-known, thereby granting it extended protection across classes against a similar mark.

On the other hand, Jordan explicitly defined the well-known trademark as the mark whose fame extended beyond the borders of its original country, and it also stated in Art.8, para 12 Trademarks Law of Jordan No. 33 of 1952 as amended in 2008 that it is not permissible to register a trademark that is identical or similar or even a translation of a well-known trademark. An example of this: there was a request to register the mark (OASIS), where the opposing party claimed that the word (OASIS) in Arabic means (ALWAHA) and it is considered a literal translation, meaning that the first condition, which is the translation, has been fulfilled. The opposing party also claimed that the mark (OASIS) is world well-known, as the trademark registrar in Jordan was satisfied with the evidence that this mark is registered in several countries to prove its fame as a well-known trademark. However, the Jordanian Higher Administrative Court in decision No. 436 of 2005 argued that registration in other countries is not sufficient evidence of fame in Jordan, and clear evidence must be provided from sales, advertising campaigns, consumer awareness surveys of the mark, and the size of market spread. Since the opponent was not able to prove that, the court decided that merely being registered in other countries is not enough to prove fame inside Jordan, which led to invalidation of the decision of the trademark registrar(Hmaidan, 2025).

7. Enforcement and Remedies

The sanctions imposed for the violation of trademark rights constitute the fundamental pillar that grants the law effectiveness in enforcement and deterrence. Their purpose is not only to achieve civil compensation but also to send a clear message that the protection of trademark rights, as a central element, carries high commercial value. A noticeable divergence in punitive philosophies is observed among the four laws.

China has the strongest civil deterrence system among the four laws under comparison. Compensatory damages may be awarded based on the amount of actual loss, the profits gained by the infringer, or the royalties of the disputed rights (Xiao, 2024). Art.63 of the 2019 Chinese Trademark Law authorizes courts to impose damages of up to five times the actual harm in cases of deliberate and serious infringement, based on either the losses of the right holder or the profits of the infringer. It is evident from this provision that the aim is not merely to compensate for damages, but to make trademark infringement in China a commercially high-risk choice. This reflects the recognition by the Chinese legislature that traditional compensation methods may not suffice to deter companies from infringing trademarks, as conventional fines may be considered merely incidental damages or a cost of doing business.

Alongside civil compensation under general rules, the Emirati legislature has moved toward imposing stricter criminal sanctions on trademark violators compared to the previous law (Aylen, 2025), where high ceilings for fines (*As part of stricter protections for Trademarks rights with the goal of totally ending all such breaches, the UAE raised the penalty for trademark infringement fine between AED 100,000 and AED 1,000,000 (27.000USD and 270.000USD)*) in addition to imprisonment constitute the primary deterrent tools.

On the other hand, Saudi Arabia, in addition of civil compensation, has adopted a mixed approach, combining principal sanctions such as imprisonment and fines (*Art 42 of the Unified Gulf Law applied in Saudi Arabia stipulates a penalty of no more than three years and a fine of between 5000 SAR and 1000000 SAR (1300USD- 266.000USD)*) with deterrent sanctions (in cases of repeat violations), such as closure of the business and publication of the judgment (Issa, 2024). The law considers these measures an integral part of the sanction, serving as a moral deterrent against trademark infringers.

Jordan follows a more moderate approach to sanctions. Although this approach is less severe in terms of fine amounts, it is precise from a criminal law perspective, linking the penalty to the degree of criminal intent and the act committed. However, the relatively low ceiling of sanctions may not provide sufficient deterrence against organized counterfeiting operations (*Art 37 of the Jordanian Trademark Law stipulates a penalty of imprisonment on trademark infringer ranging from three months to one year, and a fine between 100JD - 6,000JD (140 USD-8400 USD)*), placing it on a different track from the more modern approaches in China, the UAE, and Saudi Arabia, which increasingly tend to correlate the severity of punishment with the scale of economic harm and the seriousness of the act in the market rather than the mere intent of the infringer.

8. Conclusion

This study serves to demonstrate that trademark protection is essentially founded upon common ground within the four legal systems under examination. All of these systems recognize the legal nature of the trademark and characterize it as a property right of economic value. Nevertheless, the regulation and practical aspects of registration for such protection are different depending on each country legislative orientation and legal environment. This shows the specificity of each system and how much they are influenced by economic, administrative and judicial considerations. Therefore, such differences cannot be regarded as a legislative deficiency in any of these systems; rather, they primarily stem from the nature of each country's legal framework.

At the same time, the study found that trademark protection is not only about how strict your legal provisions on trademarks are. It is crucial to ensure that these provisions are clear, universally applicable and reliably interpreted by courts in order to strengthen protection. On the one hand, excessive procedural complexity can create a hurdle for investors and dilute unregulated absolute freedom on formal grounds invariably leads to watering down of rights. Accordingly, achieving a balance between ensuring adequate legal protection and facilitating procedures constitutes a fundamental criterion for measuring the efficiency of a legal system in this field. In addition, it also becomes clear that knowledge of the rules governing trademark registration and protection in these countries is practical needs for companies wishing to expand their activities beyond national borders as this process enables you to evaluate legal risks from early on, choose the best strategy to protect them trademarks legally and prevents disputes due not knowing procedures or differences standards.

Trademark protection is not just a formality but an effective and indispensable regulatory means to protect fair competition, maintain the trust of commercial transactions and support economic development in today's expanding global economy.

Funding: This research received no external funding.

Conflicts of Interest: The authors declare no conflict of interest.

Publisher's Note: All claims expressed in this article are solely those of the authors and do not necessarily represent those of their affiliated organizations, or those of the publisher, the editors and the reviewers.

REFERENCES

- [1] Al-Khashrum, A. H. (2005). *A Concise Guide to Industrial and Commercial Property Rights*. Jordan: Dar Wael.
- [2] Alrdaan, R. F. (2021, 10 28). Trademark Regulation in Saudi Arabia: A Matter of Ambiguity." *JL Pol'y & Globalization. Journal of Law, Policy and Globalization*, p. 74. <https://scispace.com/pdf/trademark-regulation-in-saudi-arabia-a-matter-of-ambiguity-47o1ld9jvk.pdf>
- [3] Alrdaan, R. F. (2021). Well-Known or Not Well-Known Trademark That Is the Question: An Examination of Well-Known Trademarks Regulation in Saudi Arabia. *J. Legal Ethical & Regul*, p. 11. <https://www.abacademies.org/articles/Well-known-or-not-well-known-trademark-1544-0044-24-2-654.pdf>
- [4] Alshunnaq, M. F. (2021, 09). LEGAL PROTECTION OF INTELLECTUAL PROPERTY RIGHTS UNDER JORDANIAN LEGISLATION AND INTERNATIONAL AGREEMENTS. *PUBLIC ADMINISTRATION AND LAW REVIEW*, p. 30. <https://public.scnchub.com/palr/index.php/palr/article/view/105/84>
- [5] Al-Tawalbeh, M. H. (2024). Using artificial intelligence in trademark registration in light of the UAE trademark Law. *Edelweiss Applied Science and Technology- Learning Gate*, pp. 533-548. <https://ideas.repec.org/a/ajp/edwast/v8y2024i5p533-548id1715.html>
- [6] Ayles, M. F. (2025, 07 17). *Anti-counterfeiting in the United Arab Emirates: The Current State of the Market*. Retrieved 02 04, 2026, from Lexology: <https://www.lexology.com/library/detail.aspx?g=f1891fa4-3fc5-4e24-b157-b0711816f11f>
- [7] Bou Khater, C. (2018, 03). Intellectual property rights in the light of the Saudi Arabia's vision 2030. *International Journal of Law*, pp. 154-155. <https://www.lawjournals.org/assets/archives/2018/vol4issue2/4-2-68-740.pdf>
- [8] Daudpota, F. (2025, 10 08). *Trademark Litigation in Dubai Courts (2021-2023): A Comprehensive Analysis Judicial Trends and Strategic Implications*. SSRN Electronic Journal. https://papers.ssrn.com/sol3/papers.cfm?abstract_id=5578550.
- [9] Hang, L. (2022). Research on the Development of China's Trademark Legal System after the Reform and Opening-up (1978–2021): From the Perspective of Interaction between China and International Trademark Treaty Member States." *Master Thesis*, 01. Hunan Normal University. <https://doi.org/10.27137/d.cnki.gghusu.2022.000620>
- [10] Hmaidan, R. A.-B.-H. (2025, 03). The legal framework for protecting well-known trademarks in Jordanian legislation and international conventions: How complying is national legislation with international requirements? *Corporate Law & Governance Review*, pp. 149-150. <https://doi.org/10.22495/clgrv7i1p13>
- [11] Issa, A. H. (2024, 10). Trademark Protection in the Saudi System. *Al-Andalus journal for Humanities & Social Sciences*, pp. 121-122. <https://search.mandumah.com/Record/1510268>
- [12] Jewell, C. (2016, 06 29). *China's trademark activity continues to soar*. Retrieved 01 24, 2026, from World Intellectual Property Organization (WIPO): <https://www.wipo.int/web/wipo-magazine/articles/chinas-trademark-activity-continues-to-soar-39583>.
- [13] Lacoste S.A. v Crocodile International Pte Ltd, 1137 (Beijing High People's Court 2009).
- [14] Lee, J.-A. (2020, 12 02). Prior-Use Defence in the Chinese Trade Mark Law. *European Intellectual Property Review*, p. 752. https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3734013
- [15] Luo, J. ". (2009). Protection and Enforcement of Well-Known Mark Rights in China: History, Theory and Future. *Northwestern Journal of Technology and Intellectual Property*, pp. 120-121. <https://scholarlycommons.law.northwestern.edu/njtjp/vol7/iss2/1/>
- [16] Makhlof, A. S. (2019). *Intellectual Property Rights in the Saudi Legal System*. Saudi Arabia: Institute of Public Administration, 3rd Edition.
- [17] Mohammed, A. A. (2021). The trademark in the Saudi and Jordanian Law. *Journal of the Faculty of Sharia and Law, Tafehna Al-Ashraf – Dakahlia*, p. 49.
- [18] Schackel, T. &.R. (1993, 01 01). The Trademark Law of the United Arab Emirates (Federal Law 37/1992) and an Outline of the Legal Protection in the Gulf Region. *Arab Law Quarterly*, p. 168.
- [19] Tang, S. (2023, 06). The Evolution and Laws of China's Contemporary Trademark System." *Master's Thesis*. Zhongyuan University of Technology.
- [20] Xiao, B. (2024, 03 22). Enthusiastic claimants, reluctant courts: The empirical and critical analysis of punitive damages in Chinese intellectual property law. *The Journal of World Intellectual Property*, p. 177. <https://onlinelibrary.wiley.com/doi/10.1111/jwip.12297>
- [21] Yas, N. A. (2024, 02). The civil protection of trademarks according to the UAE law. *Research Journal in Advanced Humanities*, p. 04. <https://royalliteglobal.com/advanced-humanities/article/view/1458>
- [22] Zobel, K. (2008). The Famous Marks Doctrine: Can and Should Well-Known Foreign Marks Receive Trademark Protection within the United States. *The DePaul Journal of Art, Technology & Intellectual Property Law (JATIP)*, p. 145. <https://via.library.depaul.edu/cgi/viewcontent.cgi?referer=&httpsredir=1&article=1121&context=jatip>