

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS**

PAYLESS SHOESOURCE WORLDWIDE, INC.)
a Delaware corporation,)

Plaintiff,)

v.)

Case No. 07-2334 CM

SYOSOFT CORPORATION, TRENDY)
TREADS, INC., HEATHER JONES, and)
SEAN BENOIT)

Defendants.)

COMPLAINT

Plaintiff Payless ShoeSource Worldwide, Inc. (“Payless”) makes the following allegations against defendants Syosoft Corporation, Trendy Treads, Inc., Heather Jones, and Sean Benoit (collectively “Trendy Treads”).

Parties

1. Plaintiff Payless is a corporation organized and existing under the laws of the State of Kansas, having its principal place of business in Topeka, Kansas.

2. Defendant Syosoft Corporation (“Syosoft”) is a corporation organized and existing under the laws of the state of Vermont, with its principal place of business in Vermont. Syosoft is doing business in this District, including the marketing and, upon information and belief, distribution and sale of footwear products within the state of Kansas.

3. Defendant Trendy Treads, Inc. (“Trendy”) is, upon information and belief, a corporation or, in the alternative, a d/b/a for Syosoft, with its principal place of business in Vermont. Trendy is doing business in this District, including marketing and, upon information

and belief, distribution and sale of footwear products within the state of Kansas.

4. Defendant Heather Jones is a resident of the state of Vermont.
5. Defendant Sean Benoit is a resident of the state of Vermont.

Jurisdiction and Venue

6. Payless and the defendants are citizens of different states and the matter in controversy exceeds, exclusive of interest and costs, the sum of seventy-five thousand dollars (\$75,000.00). This Court, therefore, has subject matter jurisdiction pursuant to 28 U.S. §1332(a)(1) and (2).

7. The instant action arises under the Lanham Act (15 U.S.C. §§ 1051, et seq.), so this Court also has jurisdiction under 15 U.S.C. § 1121(a), 28 U.S.C. § 1331, and 28 U.S.C. § 1338(a) and (b). Supplemental jurisdiction over the claim brought under state law is conferred by 28 U.S.C. § 1367(a).

8. Venue is proper in this district under 28 U.S.C. § 1391(a) and (c) because a substantial part of the events giving rise to the claim stated herein occurred in Kansas.

The Facts

9. Payless supplies footwear to its affiliate Payless ShoeSource, Inc., the largest specialty family footwear retailer in North America, with approximately 4,572 Payless ShoeSource retail stores. In 2006, Payless ShoeSource sold over 177 million pairs of shoes, with sales of approximately \$2.80 billion.

10. Payless owns and licenses trademarks and other intellectual property used in connection with Payless ShoeSource stores and merchandise, including the marks AIRWALK (the "AIRWALK Mark"), AMERICAN EAGLE (the "AMERICAN EAGLE Mark"), COMPEL (the "COMPEL Mark"), HUNTER'S BAY (the "HUNTER'S BAY Mark"), SAFE T STEP (the

“SAFE T STEP Mark”) SMARTFIT (the “SMARTFIT Mark”), and TEENY TOES (the “TEENY TOES Mark”) for footwear (collectively the “PAYLESS Marks”). Each of Payless' marks is inherently distinctive and/or has acquired distinctiveness. Payless also licenses a variety of marks, including SPALDING, CHAMPION and ABAETE (collectively the “PAYLESS Licensed Marks”) in connection with its footwear manufacture and sale. Payless further has agreements with Disney Enterprises, Inc. that permits it to market and sell products bearing Disney's copyrighted characters (also collectively the "PAYLESS Licensed Marks").

11. Payless and/or its licensee have used and presently use the PAYLESS Marks and PAYLESS Licensed Marks in interstate commerce in the United States in connection with footwear in order to distinguish Payless goods from those of its competitors. Payless and/or its licensee has extensively promoted the PAYLESS Marks and PAYLESS Licensed Marks, and many billions of dollars of footwear and other products have been sold under the PAYLESS Marks in Payless stores.

12. Payless owns United States trademark registrations, several of which are incontestable, for the following marks used in connection with the identified goods:

<u>Mark</u>	<u>Reg. No.</u>	<u>Goods</u>	<u>First Used in Commerce/Used Continuously Since</u>
AIRWALK	2,314,004	Footwear (IC 025)	01/00/1992
AIRWALK	2,109,810	Footwear (IC 025)	09/01/1996
AIRWALK	1,511,840	Footwear (IC 025)	09/00/1986
AMERICAN EAGLE	2,994,962	Luggage, all purpose sport bags, bags and backpacks (IC 018)	08/21/2002
COMPEL	3,204,098	Footwear (IC 025)	02/15/2004

HUNTER'S BAY	2,392,314	Footwear (IC 025)	12/01/1999
SAFE T STEP	2,371,524	Footwear (IC 025)	03/03/2000
SMART FIT	2,806,039	Footwear (IC 025)	08/01/1996
TEENY TOES	3,204,101	Footwear (IC 025)	03/26/2004
TEENY TOES	3,027,047	Retail shoe stores services (IC 035)	04/14/2004

Copies of the registrations are attached hereto as Exhibits A-J respectively.

13. Payless has expended substantial amounts of time, money and effort in promoting, advertising and marketing its PAYLESS Marks, as well as its Licensed Marks, and the goods associated therewith, and in accruing consumer goodwill and reputation for them.

14. Payless features its PAYLESS Marks and PAYLESS Licensed Marks on its Internet web site at www.payless.com and prominently displays the marks in television, print and/or other advertising. Attached hereto as Ex. K are representative examples of Payless' use of the marks in advertising and, as Ex. L, representative pages from www.payless.com.

15. The PAYLESS Marks and the PAYLESS Licensed Marks have been and continue to be an integral part of Payless' footwear lines. The PAYLESS Marks and PAYLESS Licensed Marks are and will be used in the future in connection with Payless footwear.

16. The PAYLESS Marks and PAYLESS Licensed Marks, by virtue of their extensive use and recognition by consumers, are, and have for several years, been famous marks.

17. Payless has expended substantial time, money and effort in promoting, advertising and marketing its PAYLESS Marks and PAYLESS Licensed Marks in connection with footwear.

18. The PAYLESS Marks and PAYLESS Licensed Marks have become, through widespread and favorable public acceptance and recognition, an asset of substantial value as a

symbol of Payless, its quality retail shoe store services and products, goodwill, reputation and value.

19. Upon information and belief, the defendants own and operate the Internet website, www.trendytreads.com (the "Trendy Treads Website"). The Trendy Treads Website markets, sells and offers for sale men's, women's and kid's footwear identical in appearance to footwear owned, marketed and sold by Payless under the PAYLESS Marks and PAYLESS Licensed Marks. Consequently, the Trendy Treads Website competes directly with footwear sold at Payless ShoeSource stores and on its website. Attached hereto as Ex. M are representative examples of the Trendy Treads Website. Additionally, Payless' and the defendants' footwear products are similarly priced and are directed at substantially the same types of purchasers.

20. The photographs of shoes that appear on the Trendy Treads Website, along with the product descriptions, appear to be substantially the same as those that appear on the Payless website, although in some instances, the Trendy Treads Website has associated the wrong product with a product name. Attached hereto as Ex. N. are examples of products from the Payless and Trendy Treads Website that demonstrate the substantial similarity between Payless' photos and product descriptions when compared to those appearing on the Trendy Treads Website. The Trendy Treads Website also displays the PAYLESS Marks and PAYLESS Licensed Marks without any reference to the fact that the products offered are those owned, manufactured and/or sold by Payless. In fact, the Trendy Treads Website misrepresents that the Payless' brands and those of its licensors are "manufacturers," thus deceiving consumers as to the origin of the footwear.

21. Notwithstanding Payless' prior use of and prior rights in the PAYLESS Marks and PAYLESS Licensed Marks, the defendants, without Payless' consent, used in interstate

commerce and in Kansas through Internet marketing tools the PAYLESS Marks and PAYLESS Licensed Marks in an effort to misdirect consumers to the Trendy Treads Website.

22. The past and continued use of the PAYLESS Marks and PAYLESS Licensed Marks by the defendants has caused and continues to cause a likelihood of consumer confusion, deception and mistake.

23. The past and continued use of the PAYLESS Marks and PAYLESS Licensed Marks has diluted said marks through blurring and/or tarnishing.

24. The infringing acts of the defendants have injured Payless. The defendants' infringement will cause further irreparable injury to Payless if the defendants are not immediately restrained by the court from further violation of Payless' rights. Payless has no adequate remedy at law for such continuing violations.

COUNT I

Unfair Competition (False Designation of Origin/False Descriptions/Misleading Descriptions) Under 15 U.S.C. § 1125(a)

25. Paragraphs 1 through 24 are incorporated by reference as though fully set forth herein.

26. The past and continued use of the PAYLESS Marks and PAYLESS Licensed Marks by the defendants in connection with their footwear products constitutes use in commerce of words, terms, names, symbols and/or devices under 15 U.S.C. § 1125(a)(1). Such use is likely to cause confusion or mistake as to the affiliation, connection or association of Payless the defendants and/or confusion as to the origin, sponsorship or approval of the defendants' products by Payless, in violation of 15 U.S.C. § 1125(a)(1).

27. The use of the PAYLESS Marks and PAYLESS Licensed Marks by the

defendants is a false designation of origin and/or false or misleading description of fact and/or false or misleading representation of fact under 15 U.S.C. § 1125(a)(1). It wrongfully and falsely designates the defendants' footwear products as originating from or being connected with Payless.

28. Jones and Benoit are liable under 15 U.S.C. § 1125(a) as a primary and contributory infringer for its actions and the actions of Syosoft and/or Trendy Treads.

29. The defendants, through their actions described herein, have acted willfully.

COUNT II

Trademark Infringement under 15 U.S.C. § 1114(1)

30. Paragraphs 1 through 29 are incorporated by reference as though fully set forth herein.

31. The past and continued use in commerce of the registered PAYLESS Marks by the defendants in connection with their footwear products is likely to cause confusion, or to cause mistake, or to deceive consumers.

32. Jones and Benoit are liable under 15 U.S.C. § 1114 as a primary and contributory infringer for its actions and the actions of Syosoft and/or Trendy Treads.

33. The defendants, through their actions described herein, have acted willfully.

COUNT III

Common Law Unfair Competition

34. Paragraphs 1 through 33 are incorporated by reference as though fully set forth herein.

35. The acts of the defendants described herein constitute unfair competition with Payless.

36. Jones and Benoit are liable under the common law of unfair competition as a primary and contributory infringer for its actions and the actions of Syosoft and/or Trendy Treads.

COUNT IV

Common Law Infringement

37. Paragraphs 1 through 41 are incorporated by reference as though fully set forth herein.

38. The use in commerce of the PAYLESS Marks by defendants in connection with their footwear products and the Trendy Treads Website constitutes the infringement of Payless' rights in its PAYLESS Marks.

39. The conduct of the defendants complained of herein has damaged Payless and will, unless restrained by this court, further impair, if not destroy, the value of the PAYLESS Marks and goodwill associated therewith.

40. Jones and Benoit are liable for common law trademark infringement as a primary and contributory infringer for its actions and the actions of Syosoft and/or Trendy Treads.

41. The defendants, through their actions described herein, have acted willfully.

COUNT V

**State Trademark Infringement Under
K.S.A. 81-213**

42. Paragraphs 1 through 41 are incorporated by reference as though fully set forth herein.

43. The past and continued use of the PAYLESS Marks by the defendants in connection with their footwear products constitutes use in commerce of words, terms, names, symbols and/or devices under K.S.A. 81-213. Such use is likely to cause confusion or mistake as

to the affiliation, connection or association of Payless the defendants and/or confusion as to the origin, sponsorship or approval of the defendants' products by Payless, in violation of K.S.A. 81-213.

44. The use of the PAYLESS Marks by the defendants is a false designation of origin or misleading description of fact and/or false or misleading representation of fact under K.S.A. 81-213. It wrongfully and falsely designates the defendants' footwear products as originating from or being connected with Payless.

45. Jones and Benoit are liable under K.S.A. 81-213 as a primary and contributory infringer for its actions and the actions of Syosoft and/or Trendy Treads.

46. The defendants, through their actions described herein, have acted willfully.

COUNT VI

Federal Trademark Dilution Under 15 U.S.C. § 1125(c)

47. Paragraphs 1 through 46 are incorporated by reference as though fully set forth herein.

48. Defendants' use of the PAYLESS Marks in commerce is likely to dilute and/or has diluted the distinctive quality of the PAYLESS Marks, in violation of 15 U.S.C. § 1125(c).

49. Jones and Benoit are liable under 15 U.S.C. § 1125(c) as a primary and contributory diluter for its actions and the actions of Syosoft and/or Trendy Treads.

50. The defendants, through their actions described herein, have acted willfully.

COUNT VII

State Trademark Dilution Under K.S.A. 81-214

51. Paragraphs 1 through 50 are incorporated by reference as though fully set forth herein.

52. As alleged herein, the use of the PAYLESS Marks in commerce by the defendants

threatens to dilute and/or has diluted the distinctive quality of PAYLESS Marks, in violation of K.S.A. 81-214.

53. Jones and Benoit are liable under K.S.A. 81-214 as primary and contributory diluters for its actions and the actions of Syosoft and/or Trendy Treads.

54. The defendants, through their actions described herein, have acted willfully.

Relief Sought

WHEREFORE, Payless prays for an order and judgment against defendants, and each of them:

A. Providing the defendants, including their agents, affiliates, subsidiaries, employees and all others acting in concert or participation with the defendants who use the PAYLESS Marks, or any other mark that is confusingly similar to the PAYLESS Marks, be preliminarily and permanently enjoined from:

(i) Using the PAYLESS Marks, or any other mark that is confusingly similar to and/or likely to dilute the PAYLESS Marks, in connection with the offering, sale or promotion of food products; and

(ii) Committing any other act calculated or likely to cause the public or trade to believe that the defendants or their business is in any manner connected, licensed, sponsored, affiliated or associated with Payless, or from otherwise competing unfairly with Payless.

B. Ordering the impounding of all advertising and promotional materials to the extent that said materials contain any reference to the PAYLESS Marks, or any other mark that is confusingly similar to and/or likely to dilute the PAYLESS Marks, including all means of producing copies of advertising or promotional materials that infringe Payless rights which are in

the possession, custody or control of the defendants;

C. Ordering that all signage, printed material, advertisements and other materials which bear the PAYLESS Marks, or any other mark that is confusingly similar to the PAYLESS Marks, or which if used would violate the injunction herein requested, in the possession, custody or control of the defendants, be delivered up to Payless for destruction;

D. Providing that the defendants account to Payless for all profits derived from the defendants' wrongful acts of infringement and dilution, and order such profits to be paid to Payless, and award damages and costs sustained by Payless, with appropriate interest, pursuant to 15 U.S.C. § 1117, with such monetary award trebled;

E. Awarding to Payless its reasonable attorneys' fees and such other compensatory damages as this Court may determine to be fair and appropriate pursuant to 15 U.S.C. § 1117(a);

F. Awarding to Payless three times the amount of the defendants' profits or Payless damages, whichever is greater, for willful infringement pursuant to 15 U.S.C. § 1117(b);

G. Awarding to Payless such sum as is reasonably determined to be needed to compensate Payless for corrective advertising required by the infringing activities of the defendants; and

H. Granting such other and further relief as this Court deems proper and necessary.

JURY DEMAND

Plaintiff Payless ShoeSource Worldwide, Inc. demands a jury for all issues so triable.

Respectfully submitted,

By: /s/ Joan K. Archer

Robert O. Lesley KS # 11545

Joan K. Archer KS # 15543

Lathrop & Gage LLC

2345 Grand Blvd. Suite 2400

Kansas City, Missouri 64108

Telephone: (816) 292-2000

Facsimile: (816) 292-2001

Email: rlesley@lathropgage.com

jarcher@lathropgage.com

Attorneys For Plaintiff

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Search

Payless SHOESOURCE® SHOP BY SIZE WOMEN'S MEN'S GIRLS' BOYS' ACCESSORIES SALE WIDE WDT

Home Women's Shoes & Accessories Casuals Sporty Airwalk Ary Twin Gore

Airwalk Ary Twin Gore

Lot Number: 054593
Width: Regular
Price: \$17.99

1. Size:
2. Color:

→ Size Charts
→ Measurement Tips




Alternate Views

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new arrivals
as seen in
cork
flats
metallics
patent
peep toes
prints

shop by style
athletics
boots
casuals
dance
dress
industry
sandals

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TrendyTreads
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English Français Currencies: Now in your cart: 0 items - \$0

Airwalk Ary Twin Gore

[Jump to: Home - Women's - Athletics - Previous](#)

[enlarge](#)

This canvas twin gore features graffiti art on its upper. Padded footbed and collar are extra comfortable. Non-marking, vulcanized rubber sole is true to twin gore roots. Canvas and manmade materials. Airwalk® is a registered trademark of Collective Licensing International, LLC.

Price: **\$20.87**
Width: Regular
Size:

[Add to wish list](#) [Add to cart](#)

EXHIBIT N

Shoe Categories

- Boys - Athletics
- Boys - Boots
- Boys - Casual
- Boys - Classic
- Boys - Dress
- Boys - Sandals
- Boys - Slippers
- Men's - Athletics
- Men's - Boots
- Men's - Casual
- Men's - Classic
- Men's - Dress
- Men's - Sandals
- Men's - Slippers
- Girls - Athletics
- Girls - Boots
- Girls - Casual
- Girls - Classic
- Girls - Dress
- Girls - Sandals
- Girls - Slippers
- Women's - Athletics**
- Women's - Boots
- Women's - Casuals



Search

SHOP BY SIZE WOMEN'S MEN'S GIRLS' BOYS' ACCESSORIES SALE WIDE WDT

Home Women's Shoes & Accessories Casuals Trendy American Eagle Anchor Ballet Flat

American Eagle Anchor Ballet Flat

This preppy ballet flat features a plaid canvas upper, ribbon trimmed topline and a whimsical bow on its vamp. Footbed is lightly padded for comfort. Manmade sole is lightweight and flexible.

Lot Number: 056835
Width: Regular

Sale Price: \$14.99
[Reg. Price: \$17.99]

1. Size:

2. Color:

Select a size

Plaid

[Size Charts](#)
[Measurement Tips](#)

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Alternate Views



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with any purchase of
\$50 or more

shop by trend
new arrivals
as seen in
cork
flats
metallics
patent
peep toes
prints

shop by style
athletics

American Eagle Anchor Ballet Flat at Trendy Treads



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English Français

Currencies:

Now in your cart: 0 items - \$0

Shoe Categories

- Boys - Athletics
- Boys - Boots
- Boys - Casual
- Boys - Classic
- Boys - Dress
- Boys - Sandals
- Boys - Slippers
- Men's - Athletics
- Men's - Boots
- Men's - Casual
- Men's - Classic
- Men's - Dress
- Men's - Sandals
- Men's - Slippers
- Girls - Athletics
- Girls - Boots
- Girls - Casual
- Girls - Classic
- Girls - Dress
- Girls - Sandals
- Girls - Slippers
- Women's - Athletics

American Eagle Anchor Ballet Flat

[Jump to: Home - Women's - Casuals - Previous](#)



enlarge

This preppy ballet flat features a plaid canvas upper, ribbon trimmed topline and a whimsical bow on its vamp. Footbed is lightly padded for comfort. Manmade sole is lightweight and flexible.

Price: ~~\$20.07~~ **\$17.39**

Width: Regular

Size:

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Payless ShoeSource Page 1

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type keyword or lot#

[SHOP BY SIZE](#) | [WOMEN'S](#) | [MEN'S](#) | [GIRLS'](#) | [BOYS'](#) | [ACCESSORIES](#) | [SALE](#) | [WIDE](#)

Home | Women's Shoes & Accessories | Casuals | Trendy | Airwalk Compel Clog

Airwalk Compel Clog

Our go-anywhere, seen-everywhere clog comes in several colors and patterns. Collect them all! Lightweight, flexible manmade materials. Airwalk® is a registered trademark of Collective Licensing International, LLC.

free shipping with any purchase of \$50 or more

shop by trend

new arrivals as seen in

- cork
- flats
- metallics
- patent
- peep toes
- prints



Lot Number: 051184
Width: Regular

Price: \$14.99

1. Size:

2. Color:


→ [Size Charts](#)
→ [Measurement Tips](#)

Alternate Views



Airwalk Compel Clog at Trendy Treads Page 1 of 2

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English Français



Currencies: Now in your cart: 0 items - \$0

Shoe Categories

- Boys - Athletics
- Boys - Boots
- Boys - Casual
- Boys - Classic
- Boys - Dress
- Boys - Sandals
- Boys - Slippers
- Men's - Athletics
- Men's - Boots
- Men's - Casual
- Men's - Classic
- Men's - Dress
- Men's - Sandals
- Men's - Slippers
- Girls - Athletics
- Girls - Boots
- Girls - Casual

Airwalk Compel Clog

Jump to: [Home](#) - [Women's](#) - [Casuals](#) - [Previous](#)

↔ enlarge

Our go-anywhere, seen-everywhere clog comes in several colors and patterns. Collect them all! Lightweight, flexible manmade materials. Airwalk® is a registered trademark of Collective Licensing International, LLC.

Price: **\$17.39**

Width: Regular

Size:

Add to wish list
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Payless ShoeSource Page

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Payless SHOESOURCE® [SHOP BY SIZE](#) [WOMEN'S](#) [MEN'S](#) [GIRLS'](#) [BOYS'](#) [ACCESSORIES](#) [SALE](#) [WID](#)

[Home](#) [Men's Shoes & Accessories](#) [Classics](#) [Classics](#) [Charles Cap-Toe Oxford](#)

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canvas
skate

shop by style
new arrivals
athletics
boots
casuals
classics
dress
industry
sandals
slippers

wide widths
sale

Charles Cap-Toe Oxford

This stylish oxford features a comfortable almond toe shape with a sleek stacked heel and stitch details. Padded footbed adds comfort. All Hunter's Bay Leather Collection shoes feature our exclusive Comfort Layering System. Leather and manmade materials.



Lot Number: 000001
Width: Regular


Price: \$39.99

1. Size:

2. Color:

[Size Charts](#)
[Measurement Tips](#)

Alternate Views



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Charles Cap-Toe Oxford at Trendy Treads Page 1 of 2

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English Français

Currencies:


Now in your cart: 0 items - \$0

Shoe Categories

- Boys - Athletics
- Boys - Boots
- Boys - Casual
- Boys - Classic
- Boys - Dress
- Boys - Sandals
- Boys - Slippers
- Men's - Athletics
- Men's - Boots
- Men's - Casual
- Men's - Classic**
- Men's - Dress
- Men's - Sandals
- Men's - Slippers
- Girls - Athletics
- Girls - Boots
- Girls - Casual

Charles Cap-Toe Oxford

[Jump to: Home - Men's - Classic - Previous |](#)



[enlarge](#)

This stylish oxford features a comfortable almond toe shape with a sleek stacked heel and stitch details. Padded footbed adds comfort. All Hunter's Bay Leather Collection shoes feature our exclusive Comfort Layering System. Leather and manmade materials.

Price: **\$46.39**
Width: Regular
Size:

[Add to wish list](#) [Add to cart](#)

Payless ShoeSource Page 1

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SHOP BY SIZE WOMEN'S MEN'S GIRLS' BOYS' ACCESSORIES SALE WIDE

Home Men's Shoes & Accessories Athletics Sneakers SafeTStep Athletic

free shipping
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shop by trend
canvas
skate

shop by style
new arrivals
athletics
boots
casuals
classics
dress
industry
sandals
slippers

wide widths
sale

SafeTStep Athletic

Comfortable, durable and extra-safe are just some of the words that describe this SafeTStep® quality manmade upper. It's the perfect duty or uniform shoe that is required by some food service organizations. Sole is oil-resistant and slip-resistant. Manmade materials.



Lot Number: 041165
Width: Wide

Price: \$24.99

1. Size:

2. Color:

→ [Size Charts](#)
→ [Measurement Tips](#)


Alternate Views



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SafeTStep Athletic at Trendy Treads Page 1 of 2


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Find Your Sole.

English 

Français 

Currencies:



 Now in your cart: 0 items - \$0

Shoe Categories

- Boys - Athletics
- Boys - Boots
- Boys - Casual
- Boys - Classic
- Boys - Dress
- Boys - Sandals
- Boys - Slippers
- Men's - Athletics**
- Men's - Boots
- Men's - Casual
- Men's - Classic
- Men's - Dress
- Men's - Sandals
- Men's - Slippers
- Girls - Athletics
- Girls - Boots
- Girls - Casual
- Girls - Classic

SafeTStep Athletic

[Jump to: Home - Men's - Athletics - Previous](#)

[enlarge](#)

Comfortable, durable and extra-safe are just some of the words that describe this SafeTStep® quality manmade upper. It's the perfect duty or uniform shoe that is required by some food service organizations. Sole is oil-resistant and slip-resistant. Manmade materials.

Price: **\$28.99**

Width: Wide

Size:

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Payless ShoeSource Page 1

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Payless SHOESOURCE™ SHOP BY SIZE WOMEN'S MEN'S GIRLS' BOYS' ACCESSORIES SALE WIDE

Home Girls' Shoes & Accessories Casuals Casuals SmartFit™ Cheetah Flat

SmartFit™ Cheetah Flat

Warm, fuzzy and cute as a kitten, this cheetah print ballet flat features a glittery heart on its vamp and SmartFit technology designed to support her growing feet. Fabric and manmade materials.

Lot Number: 056632
Width: Regular
Price: \$16.99

1. Size: 2. Color:

→ Size Charts
→ Measurement Tips [Add to Shopping](#)

Alternate Views

free shipping
with any purchase of \$50 or more

shop by size
infant (sizes 1 - 4)
toddler (sizes 5 - 10)
youth (sizes 10.5 - 4.5)

shop by style
new arrivals
athletics
boots

SmartFit™ Cheetah Flat at Trendy Treads Page 1 of 2

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TrendyTreads
Find Your Sole.

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English Français

Currencies:

Now in your cart: 0 items - \$0

SmartFit™ Cheetah Flat

Jump to: Home - Girls - Casual - Previous |

enlarge

Warm, fuzzy and cute as a kitten, this cheetah print ballet flat features a glittery heart on its vamp and SmartFit technology designed to support her growing feet. Fabric and manmade materials.

Price: **\$19.71**
Width: Regular
Size:

[Add to wish list](#) [Add to cart](#)

Shoe Categories

- Boys - Athletics
- Boys - Boots
- Boys - Casual
- Boys - Classic
- Boys - Dress
- Boys - Sandals
- Boys - Slippers
- Men's - Athletics
- Men's - Boots
- Men's - Casual
- Men's - Classic
- Men's - Dress
- Men's - Sandals
- Men's - Slippers
- Girls - Athletics
- Girls - Boots
- Girls - Casual**
- Girls - Classic
- Girls - Dress
- Girls - Sandals
- Girls - Slippers
- Women's - Athletics

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