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# Trademarks in Motion: Cole Palmer Shoots His Shot to Register Goal Celebration as Trademark in the U.S.

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When Chelsea midfielder Cole Palmer secured trademark protection in the United Kingdom for the motion of his now-familiar goal celebration, it became the latest example of athletes treating expressive gestures as brand assets. Palmer's shiver

gesture is a short, tightly defined sequence that fans now associate with him almost instantly (soccer fans, at least — basketball aficionados might associate the gesture with basketball player Trae Young, and his “Ice Trae” nickname and identical celebration). By registering the celebration as a motion mark, Palmer joined a small but growing group of athletes who have taken formal steps to protect the visual elements of their persona. And while the U.K. registration has been much discussed, Palmer recently also quietly filed for protection for the same celebration motion mark in the U.S.

For U.S. trademark lawyers, his filing raises practical questions about how the USPTO treats motion and gesture marks, what evidence is required to obtain one, and whether similar protection is realistic in the United States.

To understand why Palmer’s filing is notable, it helps to place it in context. Athletes have long recognized the value of stylized postures, not just in sports but in broader popular culture. The clearest U.S. example is Usain Bolt, who successfully registered a silhouette of his signature lightning bolt pose with the USPTO. Bolt’s filing worked because it was a distinctive and consistent pose that appeared not just during competition but on merchandise and promotional materials in a source-identifying manner. Outside the U.S., soccer players have increasingly experimented with protecting their celebrations. Gareth Bale obtained (and subsequently abandoned) UK protection for his so-called Eleven of Hearts hand-heart gesture. Kylian Mbappé secured registration of his arms-folded celebration pose in the EU and other jurisdictions.

But in previous examples, the trademarks at issue have been stylized depictions of the celebrations that could serve as a logo, like Michael Jordan’s Jumpman. Palmer takes this a step further, with the trademark registration depicting a short video of Palmer doing the celebration. One could see the potential use for this mark in licensing this gesture

to video games like EA FC or Fortnite, or endorsing products in a video ad.

Motion marks, at their core, are simply moving images that operate as trademarks. Consumers encounter them every day, even if they do not think of them as marks. Pixar's lamp hopping onto the screen, Columbia Pictures' Torch Lady raising her flame, and the Marvel page-flip sequence are all classic examples of U.S. motion marks. Each is presented consistently at the start of content or during product interaction, and each has become a strong source identifier. These examples also highlight the industries in which motion marks have flourished. Entertainment, technology, and gaming are natural fits because motion is already a central part of how those products are experienced.

For U.S. practitioners, the Palmer filing is a useful thought experiment for what a motion or celebration mark would require under U.S. law. Notably, Palmer's U.S. filing is based on his UK registration, which allows him to seek registration in the United States without first showing U.S. use in commerce, but is still subject to the other technical requirements for a trademark in the United States. In practice, the USPTO has been particularly skeptical of motion marks for goods, especially when they originate from foreign filings, and often issues detailed information requests about how the mark is actually used.

Motion marks are recognized at the USPTO, but the evidentiary burden is heavier than for traditional words or logos. Applicants must submit precise descriptions of the movement. More importantly, they must show that the motion functions as a trademark in commerce. A gesture performed during a match is not automatically trademark use for U.S. purposes. For applications not based on foreign filings, in order to receive a registration, the motion must appear on or in connection with the goods or services in a way that communicates brand

origin. That usually requires consistent use in advertising, merchandising, or digital interfaces.

Distinctiveness is the next hurdle. The USPTO expects evidence that consumers perceive the movement as a brand signature. For entertainment companies, this proof is straightforward because the animations precede every film or product launch. For athletes, it is more complicated. While viral clips and sports broadcasts build public recognition, the applicant must show that the motion has crossed the line from personal expression to brand indicator. One example of such transcendence in sport is the famous catchphrase “Let’s Get Ready to Rumble,” a trademark that started as a crowd engagement play and became so distinctive that you can hear it when you read it, and associate it with its source.

Enforcement considerations also deserve attention. A registered motion mark does not prohibit casual imitation. A fan copying a celebration is not infringing. The real value lies in preventing unauthorized parties from commercializing the gesture in merchandising, marketing, digital products, or endorsements. In many cases, the right of publicity may complement or exceed trademark rights in controlling commercial use of an athlete’s gesture or likeness. Together, they form a practical toolkit for athletes seeking to manage the commercial dimensions of their persona.

As brands continue to shift toward video-first identity systems, motion marks will likely become more relevant across industries. A distinctive micro-animation in a mobile app, a recurring gesture that represents a performer, or a characteristic interaction in a gaming interface may all warrant protection. Practitioners should encourage clients to identify emerging motion-based brand elements early, standardize their presentation, and gather the evidence needed to support an eventual application. Coordination across marketing, legal, and design teams is critical for ensuring that the motion

functions as a true source identifier rather than a one-off creative flourish.