

**OPPOSITION TO THE REGISTRATION OF
A MARK, WITH DECLARATION**

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the matter of trademark application Serial No. 76/305681

Filed August 27, 2001

For the mark CROWN OF HEARTS

Published in the Official Gazette on October 22, 2002
(Date)

11-15-2002

U.S. Patent & TMO/TM Mail Rcpt Dt. #73

Chrome Hearts, Inc.

(Name of opposer)

v.

Christiana Lapetina-Johnson

(Name of applicant)

Opposition No. _____
(To be inserted by Patent & Trademark Office)

NOTICE OF OPPOSITION

State opposer's name, address, and entity information (1)

Chrome Hearts, Inc., California corporation located at 915 N. Mansfield, Hollywood, California 90038

Name of individual as opposer, and business trade name, if any

Business address

Name of partnership as opposer

Name of partners

Business address of partnership

Name of corporation as opposer

Chrome Hearts, Inc.

11/26/2002 MPETTY 00000023 76305681

State or country of incorporation

01 FC:6402

300.00 DP

California

Business address of corporation

915 N. Mansfield, Hollywood, California 90038

The above-identified opposer believes that it/he/she will be damaged by registration of the mark shown in the above-identified application, and hereby opposes the same. (2)

The grounds for opposition are as follows: (3) **Opposer believes that Applicant's CROWN OF HEARTS mark for clothing is confusingly similar to its CHROME HEARTS-family of marks for various goods and services, including clothing. Opposer has been using its CHROME HEARTS mark in interstate commerce in connection with clothing since as early as 1989.**

By [Signature]
(Signature)(4)

Attorney for Opposer
(Identification of Person Signing)(5)

FOOTNOTES

(1) If opposer is an individual, state the opposer's name, business trade name, if any, and business address. If opposer is a partnership, state the name of the partnership, the names of the partners, and the business address of the partnership. If opposer is a corporation, state the name of the corporation, the state (or country, if opposer is a foreign corporation) of incorporation, and the business address of the corporation. If opposer is an association or other similar type of juristic entity, state the information required for a corporation changing the term "corporation" throughout to an appropriate designation.

(2) The required fee must be submitted for each party joined as opposer for each class opposed, and if fewer than the total number of classes in the application are opposed, the classes opposed should be specified.

(3) Set forth a short and plain statement here showing why the opposer believes it/he/she would be damaged by the registration of the opposed mark, and the state of grounds for opposing.

(4) The opposition need not be verified and may be signed by the opposer or by the opposer's attorney or other authorized representative. If an opposer signing for itself is a partnership, the signature must be made by a partner; if an opposer signing for itself is a corporation or similar juristic entity, the signature must be made by an officer of the corporation or other juristic entity who has authority to sign for the entity and whose title is given.

(5) State the capacity in which the signing individual signs, e.g., attorney for opposer, opposer (if opposer is an individual), partner of opposer (if opposer is a partnership), officer of opposer identified by title (if opposer is a corporation), etc.

REPRESENTATION INFORMATION

If the opposer is not domiciled in the United States, and is not represented by attorney or authorized representative located in the United States, a domestic representative must be designated.

If the opposer wishes to furnish a power of attorney, it may do so, but an attorney at law is not required to furnish a power.

This form is estimated to take an average of 1 hour to complete, including time required for reading and understanding instructions, gathering necessary information, recordkeeping, and actually providing the information. Any comments on this form, including the amount of time required to complete this form, should be sent to the Office of Management and Organization, U.S. Patent and Trademark Office, U.S. Department of Commerce, Washington, D.C. 20231. Do NOT send completed forms to this address.

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11-15-2002

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November 14, 2002

BY EXPRESS MAIL

Box TTAB - Fee
Assistant Commissioner for Trademarks
2900 Crystal Drive
Arlington, VA 22202-3513

Re: Chrome Hearts, Inc. v. Christiana Lapetina-Johnson (Notice of Opposition)

Dear Sir:

Enclosed for filing are two original *Notices of Opposition* against Application Serial No. 76/305681 for the CROWN OF HEARTS mark in International Class 25, along with a credit card payment form in the amount of \$300 to cover the required filing fee. This Application was published in the Official Gazette on October 22, 2002.

Please file the Notice of Opposition and acknowledge receipt thereof by date stamping and returning the self - addressed enclosed post card.

Respectfully submitted,


AFSCHINEH LATIFI

CERTIFICATE OF MAILING BY EXPRESS MAIL

I certify that this document and fee is being deposited on November 14, 2002 with the U.S. Postal Service "Express Mail Post Office to Addressee" service under 17 C.F.R. 1.10 and is addressed to Box TTAB - Fee, Assistant Commissioner for Trademarks, 2900 Crystal Drive, Arlington, VA 22202-3513.


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