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

Proceeding	91162078
Party	Plaintiff THE UNITED STATES PLAYING CARD COMPANY
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Signature	/s/Kristi Wells
Date	01/12/2006
Attachments	RELIANCE.pdf (9 pages)

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

**THE UNITED STATES PLAYING
CARD COMPANY,**

Opposer,

**Serial No. 78/253725
Opposition No. 91162078**

v.

HARBRO, LLC,

Applicant

**OPPOSER THE UNITED STATES PLAYING
CARD COMPANY'S NOTICE OF RELIANCE
SUBMITTED IN REBUTTAL**

As required by 32 C.F.R. §2.122 and the Trademark Trial and Appeal Board Manual of Procedure (TBMP) Section 704.02, this Notice of Reliance serves to notify the opposing party, Harbro, LLC, that The United States Playing Card Company intends to rely in support of its case the materials hereunder and attached hereto (attachments sent via First Class Mail) in support of its case, all of which are available to the general public:

Publication	Date	Bates Nos.	Use/Reference
Bon Appétit	Sept., 2005	PC-01943 through PC-01956	
		PC-01945	... Vegas: The Second Wave
		PC-01949	As for Vegas, well, it isn't really a great restaurant city ...
		PC-01950	MGM Grand is the ultimate Vegas destination for savvy travelers ...

Publication	Date	Bates Nos.	Use/Reference
		PC-01951	More of what you come to Vegas for.
		PC-01953	Taste of Vegas
			Only Vegas™
			Only in Vegas can you experience ...
			Picture of a chef wearing an "Only Vegas" coat and flipping playing cards.
		PC-01954	Only Vegas.
			Only Vegas™
			What's Your Vegas Alibi?
			Picture of Emeril Lagasse wearing " Only Vegas" coat
			Picture of Daniel Voulud wearing " Only Vegas" coat and fanning playing cards
			Picture of Tom Moloney wearing " Only Vegas" coat
			Picture of Guy Savoy wearing "Only Vegas" coat and fanning playing cards.
			Picture of Jöel Robuchon wearing " Only Vegas" coat and flipping playing cards.
			Picture of Rock Moonen wearing " Only Vegas" coat
			"Taste of Vegas" with a chef's hat design to the right of each chef's name.
		PC-01955	Only Vegas™

Publication	Date	Bates Nos.	Use/Reference
			<p>Rick Moonen: ... Things I Love Most About Vegas... Best Vegas Memory:</p> <p>Guy Savoy: ... Things I Love Most About Vegas ... Best Vegas Memory: ... Favorite Vegas Gaming Pastime:</p> <p>Daniel Boulud: ... Thing I Love Most About Vegas: Being In Vegas Today. ... Best Vegas Memory: In 1981, I Took First Trip To Vegas In An RV - That Is When I Discovered Vegas.</p> <p>Jöel Bobuchon: ... Thing I Love Most About Vegas ... Favorite Vegas Gaming Pastime:</p> <p>Tom Moloney: ... Thing I Love Most About Vegas ... Biggest Career Gamble: Moving From Florida To Vegas ... Favorite Vegas Gaming Pastime:</p> <p>Emeril Lagasse: ... Thing I Love Most About Vegas ... Best Vegas Memory: What Happens In Vegas, Stays In Vegas.</p>
<i>The Wall Street Journal</i>	Oct. 22, 2005	PC-01956	Vegas The Second Wave ...
		PC-01957 through PC-01959	
		PC-01959	<p>It's Our Vegas Sweepstakes!</p> <p>travelocity.com/vegas</p> <p>It's Our Vegas Sweepstakes!</p> <p>Only Vegas™</p>

Publication	Date	Bates Nos.	Use/Reference
<i>National Geographic Traveler</i>	Oct. 2001	PC-01960 through PC-01962	
		PC-01962	... In Vegas our buildings are proud ...
			... before Walt opened the gates in Anaheim, he visited Vegas, ...
			... real estate is the tabula rasa on which Vegas immigrants ...
			... But in Vegas one never forgets the desert. ...
		 I doubt our Vegas Popsicle will melt anytime soon. ...
Gale Group, Inc. ASAP/Advanstar Communications, Inc. <i>Travel Agent</i> (available on LEXIS/NEXIS)	March 3, 2003	PC-01963 through PC-01965	... In London and Manchester, England, taxicabs were adorned with Vegas symbols, including images of playing cards and dice.
New York Times (available on Westlaw)	Jan. 30, 2004	PC-02603 through PC-02604	... CASINO CARDS--Deal from a deck of used playing cards from Las Vegas casinos that frequently replace their cards \$1.25 to \$1.75 a deck, all with casino logos. (866) 663-1445 www.homecasinogames.com ...
New York Times (available on Westlaw)	March 5, 2005	PC-02605 through PC-02606	...Michael Godard Fine Arts, a Las Vegas company that sells whimsical paintings and reproductions, featuring martini glasses, poker chips, playing cards...
New York Times (available on Westlaw)	Feb. 26, 2004	PC-02607 through PC-02608	...anyone who has ever played in Las Vegas or even a game of Go Fish has almost certainly played with the company's cards...

Publication	Date	Bates Nos.	Use/Reference
Fort Worth Star Telegram (available on Westlaw)	Oct. 3, 2004	PC-02609 through PC-02610	Slot machines, playing cards and even the famed Las Vegas skyline won't be on Nevada's quarter, much to the disappointment of state officials.
The Kansas City Star (available on LEXIS/NEXIS)	Nov. 28, 2000	PC-02611 through PC-02613	
		PC-02612	...The largest of the also-ran card makers is Las Vegas-based Paul-Son Gaming Corp...
		PC-02613	...Casinos cannot simply throw used cards away. State regulators typically require permanent destruction or defacing of each card to ensure that none pops out of the sleeve of a card cheat one day...
		PC-02613	... As a result, card recycling is a Las Vegas cottage industry. Baranowski said recyclers competed with one another for boxes of used cards that have been drilled through by the casinos or have had their corners clipped...
		PC-02613	...These entrepreneurs then hand-sort the cards back into complete decks for secondary sales as Las Vegas souvenirs...
Las Vegas Mini Rough Guide by Greg Ward	March, 2000	PC-02614 through PC-02626	
		PC-02619	...His greatest coup was to establish the <i>Horseshoe</i> as the permanent home of the World Series of Poker ...
		PC-02620	Blackjack is the most popular table game in Las Vegas...

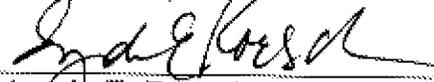
Publication	Date	Bates Nos.	Use/Reference
		PC-02622	... Poker is unique among Las Vegas card games in that gamblers play against each other...
			...Several [casinos] have begun to stage poker tournaments along the lines of the wildly successful, World Series of Poker held in April each year at Binion's <i>Horseshoe</i> downtown...
		PC-02624 through PC-02625	Gamblers General Store ...they have ...packs of cards from all the casinos for .99¢
		PC-02626	Top twelve Las Vegas movies... <i>Honeymoon in Vegas</i> (1993)...
Frommers@ Las Vegas 2006	2006	PC-02627 through PC-02641	
		PC-02629	Diagram of Blackjack table
		PC-02630	Display of cards in Poker Hands
		PC-02632	A Look Back at Vegas: No Tomorrow
			Best of Vegas After Dark
		PC-02633	Vegas on the Upswing
			Penn & Teller's Top 10 Things One Should Never Do In A Vegas Magic Show
			Recording Vegas
		PC-02635	...gambling is what Vegas is about...
			Almost everyone plays in Vegas...

Publication	Date	Bates Nos.	Use/Reference
		PC-02637	Blackjack
		PC-02639	POKER
			...In Las Vegas, poker is just about the biggest thing going
			...Just about every casino now has a poker room, and it's just a matter of time before the others catch up...
			Card sharks are not a rare species in Vegas...
			PAI GOW POKER
			CARIBBEAN STUD POKER
		PC-02640	3 CARD POKER
			...at least one table in major Vegas casinos...
		PC-02641	5 Souvenirs
			...Bonanza Gift and Souvenir Shop , 2460 Las Vegas Blvd. S... It's the self-proclaimed "World's Largest Gift Shop"...all kinds of playing cards both new and used (casinos have to change decks frequently, so this where used packs go)...
			...the best place in Vegas for your comic-book needs.

TBMP §704.02 requires in some instances a statement on the relevance of the materials listed to the case. The materials above are relevant to demonstrate that the term "VEGAS" is used primarily to refer to the city of Las Vegas, Nevada, a well-known geographical location. This evidence rebuts

Applicant's argument that it should be allowed to register the term "VEGAS" because the registrations of other geographic locations, in Applicant's opinion, demonstrate that the term is not primarily geographic. These articles are also relevant to illustrate a connection between playing cards and the city of Las Vegas, NV. This evidence rebuts Applicant's argument that there is no connection between playing cards and the city of Las Vegas, NV. Applicant introduced evidence to try to show playing cards are not associated with Las Vegas because playing cards may be manufactured and purchased in other geographic locations.

Respectfully submitted,

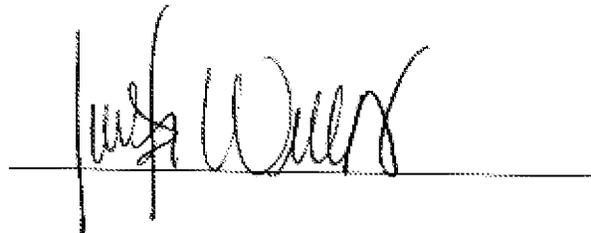


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ATTORNEY FOR OPPOSER
The United States Playing Card Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing and the attachment was delivered via First Class Mail, on this 12th day of January, 2006 to Timothy Flory, Esq. and Terence J. Linn, Esq., Van Dyke, Gardner, Linn & Burkhardt, LLP, Suite 207, 2851 Charlevoix Drive SE, P.O. Box 888695 Grand Rapids, MI 49588-8695.



CERTIFICATE OF TRANSMISSION

I hereby certify that this correspondence is being transmitted by electronic mail to the United States Patent and Trademark Office on the date shown below.

Kristi Wells

(Type or printed Name of Person Signing Certificate)

(Signature)

January 12, 2006

(Date)