



BULKY DOCUMENTS

(Exceeds 100 pages)

Proceeding/Serial No: 91189629

Filed: 03-02-2010

Title: REPLY MEMORANDUM OF LAW
IN FURTHER SUPPORT OF
APPLICANT'S MOTION FOR
SUMMARY JUDGMENT

Part 2 of 2

4. The font and style of the LA DOLCE VITA product labels are similar to and consistent with the labels on my Royal Treatment® and Italian Pet Spa™ product lines, which launched in 2002 (Royal Treatment Natural Pet Formulas) and 2007 (Italian Pet Spa) and which are not the subject of the application at issue in this matter. I personally and intentionally created a label for the LA DOLCE VITA brand that would look similar to my previous product lines, because I wanted to make my brands easily identifiable with me. The labels for Royal Treatment® and Italian Pet Spa™ all use my full name. Attached hereto as Exhibit B are true and correct copies of the labels for the Royal Treatment® and Italian Pet Spa™ product lines.

5. The LA DOLCE VITA products are sold only in retail PetSmart stores. In the future, they will also be sold on PetSmart's internet website, <http://www.petsmart.com>, but they are not sold there at present. As a private-label line, they will not be sold anywhere other than PetSmart.

6. PetSmart selected me to create the LA DOLCE VITA product line for their stores, because I have been making and selling pet-grooming products since 2002 and have earned notoriety in the pet-care industry. For example, I promoted and sold the Royal Treatment® brand of pet products on Home Shopping Network television for the past eight years. In connection with my knowledge of pet grooming and to promote my products, I have been featured in a number of national and international television programs and media articles. I am also often asked by various media outlets to make appearances and provide my opinion on pet care. I have posted some of the articles and clips from some of the television shows that have featured me on my website at <http://www.royalpetclub.com/Press.html>.

Attached hereto as Exhibit C is a print out of the press page and select articles that are posted on this website.

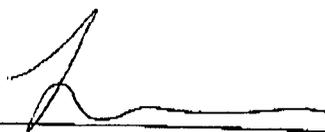
7. PetSmart does not mention my grandmother, Marcella Borghese, or my family history to advertise, market, or otherwise promote the LA DOLCE VITA products.

8. I removed a reference to my grandmother, the late Marcella Borghese, from my website www.getroyaltreatment.com as a good faith gesture to resolve Borghese Trademark Inc.'s assertion that my mention of her name was somehow improper.

9. In past television appearances, I have stated that people can use my products on themselves to explain that the products are gentle and will not harm dog owners when applying the products to their pets. Human skin is less delicate and sensitive than dogs' skin and will not be irritated by my wholesome pet products. My products, however, are designed only for use on animals. The textual information on my product labels makes clear that they are for pets, as does the explicit warning that reads, "FOR TOPICAL USE ON ANIMAL ONLY." Attached hereto as Exhibit D are true and correct copies of the portion of the label for the LA DOLCE VITA products that provides the product description and warning.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed in Los Angeles, California on the 1 day of March, 2010.



Lorenzo Borghese

EXHIBIT A

To Second Declaration of Lorenzo Borghese

Applicant's Reply Memorandum of Law in Further Support
of Applicant's Motion for Summary Judgment

Borghese Trademarks, Inc. v. MultiMedia Exposure, Inc., No. 91189629

MOISTURIZING
CREAM



1.7 fl.oz. 50 ml e



La Dolce Vita consists of scientifically formulated bath and body products for pets. All recipes are created in the hills of Italy using the highest quality ingredients from Mother Nature. This gentle cream moisturizes and soothes the paws, elbows and other dry spots. Quick drying formula helps to keep furniture safe from stains. It's the key to the good life! **TO USE:** Apply cream to fingertips and gently massage on dog's clean paw, elbows or other dry spots. Use several times a day, if needed.
CONTAINS: Vanilla, Milk Protein, Oat Protein, Silk and Almond Protein.

WARNING: NOT A FOOD PRODUCT. FOR TOPICAL USE ON ANIMALS ONLY. KEEP AWAY FROM CHILDREN. DISCONTINUE USE IF IRRITATION DEVELOPS. STORE AT ROOM TEMPERATURE. AGAINST CRUELTY TO ANIMALS.

INGREDIENTS: AQUA (WATER), GLYCERIN, CYCLOPENTASILOXANE, PROPYLHEPTYL CAPRYLATE, PARFUM (FRAGRANCE), SIMMONDSIA CHINENSIS (SIMMONDSIA CHINENSIS (JOJOBA) SEED OIL), COCOGLYCERIDES, SODIUM POLYACRYLATE, PHENOXYETHANOL, MYRISTYL ALCOHOL, IMIDAZOLIDINYL UREA, OLUS, ALLANTOIN, PANTHENOL, HYDROLYZED SWEET ALMOND PROTEIN, HYDROLYZED MILK PROTEIN, HYDROLYZED OAT PROTEIN, HYDROLYZED SILK, TETRASODIUM EDTA, METHYLPARABEN, BUTYLPARABEN, ETHYLPARABEN, ISOBUTYLPARABEN, PROPYLPARABEN, CI 15985 (FD&C YELLOW NO.6).

PS02-04-001 - DISTRIBUTED BY:
MME, Inc. - Bernardsville, NJ 07924

www.getroyaltreatment.com - www.nuzzleplanet.com



ULTRA-MOISTURIZING
SPRITZ
TEARLESS

VANILLA BEAN AND MILK

M
300
57
la Dolce Vita
Parfums & Cosmetics

MADE IN ITALY

6.7 fl.oz.

200 ml e

La Dolce Vita consists of scientifically formulated bath and body products for pets. All recipes are created in the hills of Italy using the highest quality ingredients from Mother Nature. This bath spritz combines hydrating Milk Proteins and Italian Vanilla to moisturize the skin and soften the coat, keeping it smooth and shiny. Quick-drying and suitable for daily use, it keeps your dog refreshed, smelling fantastico and living the good life in between baths. **TO USE:** Shake product well and mist entire coat until lightly damp. Stroke through gently with soft bristle brush, comb or hand. Rinsing is not required. **CONTAINS:** Milk Protein, Oat Protein, Silk Protein, Almond Protein and Vanilla.

WARNING: PRODUCT IS BEST SUITED FOR DOGS. FOR TOPICAL USE ONLY. DO NOT CONTINUE USE IF IRRITATION DEVELOPS. KEEP OUT OF CHILDREN'S REACH. STORE AT ROOM TEMPERATURE. OPPOSES CRUELTY TO ANIMALS.

INGREDIENTS: AQUA (WATER), PEG-26-BUTETH-26, PEG-40 HYDROGENATED CASTOR OIL, PARFUM (FRAGRANCE), PEG/PPG-20/6 DIMETHICONE, BUTYL METHOXYDIBENZOYL METHANE, ETHYLHEXYL METHOXY CINNAMATE, HYDROLYZED OAT PROTEIN, HYDROLYZED SWEET ALMOND PROTEIN, DEXTRIN, VANILLA PLANIFOLIA EXTRACT (VANILLA PLANIFOLIA FRUIT EXTRACT), HYDROLYZED MILK PROTEIN, GLYCERIN, DMDM HYDANTOIN, IODOPROPYNYL BUTYL CARBAMATE, CI 15985 (YELLOW NO.6).



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 MME, Inc. - Bernardsville, NJ 07924
www.getrealtreatment.com
www.nozleplanet.com



EXHIBIT B

To Second Declaration of Lorenzo Borghese

Applicant's Reply Memorandum of Law in Further Support
of Applicant's Motion for Summary Judgment

Borghese Trademarks, Inc. v. MultiMedia Exposure, Inc., No. 91189629

by PRINCE
Lorenzo Borghese

Royal Treatment
 *italian pet spa*

ITALIAN
PINK
GRAPEFRUIT

CONDITIONER
MOISTURIZING
DEFOUNGLER

100% ORGANIC

GRAPEFRUIT

MADE IN ITALY

8.4 fl.oz.

250 ml e

by PRINCE
Lorenzo Borghese

Royal Treatment
 italian perfume

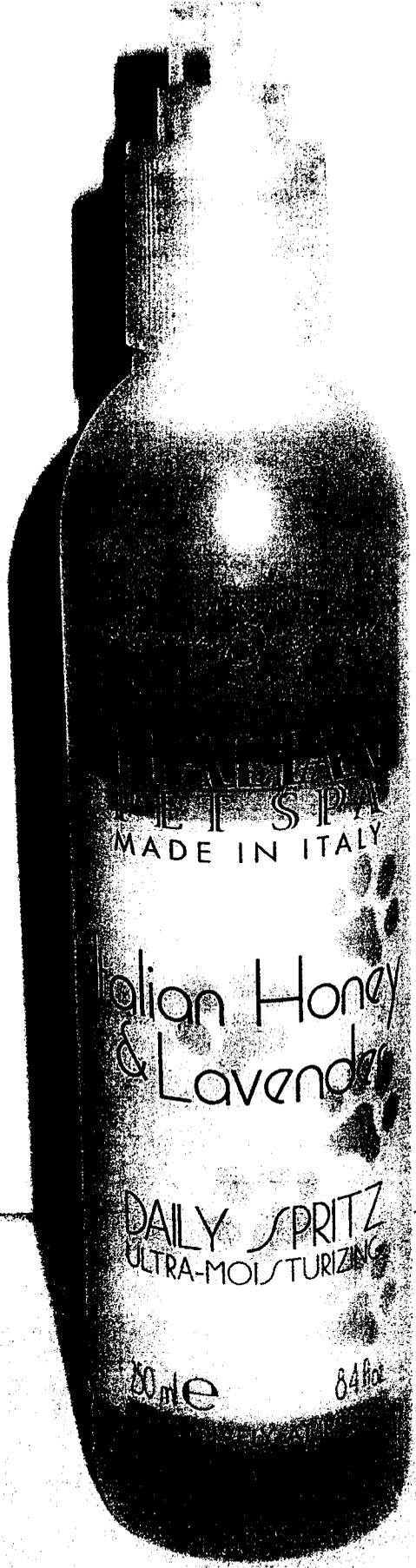
ITALIAN
PINK
GRAPEFRUIT

CONDITIONER
MOISTURIZING
DETANGLER

100% ORGANIC GRAPEFRUIT

MADE IN ITALY

8.4 fl.oz. 250 ml



MADE IN ITALY

Italian Honey
& Lavender

DAILY SPRITZ
ULTRA-MOISTURIZING

30 ml e

8.4 fl. oz.

by PRINCE

Lorenzo of Sorghese

ITALIAN

PETROL SPA

MADE IN ITALY

EXHIBIT C

To Second Declaration of Lorenzo Borghese

Applicant's Reply Memorandum of Law in Further Support
of Applicant's Motion for Summary Judgment

Borghese Trademarks, Inc. v. MultiMedia Exposure, Inc., No. 91189629

Luxury Pet Supplies Dogs | Luxury Pet Supplies Cats | Gourmet Organic Pet Treats | Natural Pet Supplement | Pet Grooming Supplies | Best Natural Dog Shampoo | Free Pet Treats

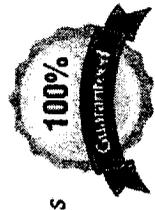
Prince Lorenzo Borghese | Royal Pet Club | Press



Royal

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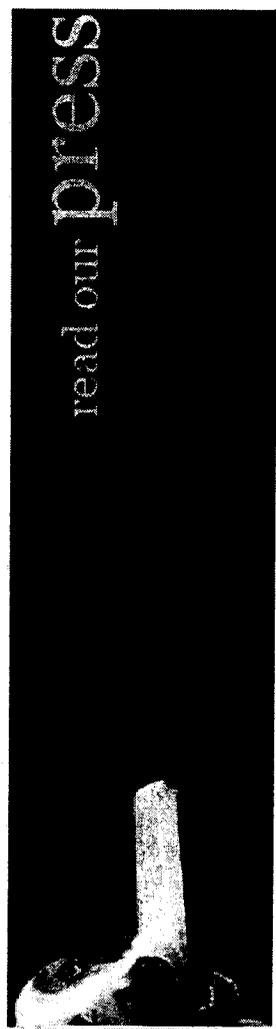
Home • Our Blog • Pet Health • Shop • Our Cause • About Us • Press • Contact Us

 Shop

- Grooming
- Supplements
- Treats
- Bedding
- Toys
- Customer Testim

 Shop

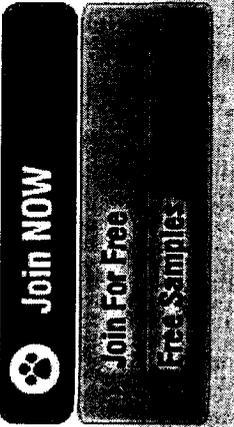
- Grooming
- Supplements
- Treats
- Bedding
- Toys
- Customer Testimonials



 Watch

- America's Next Top Dog
- Enter Our Contest
- Paws Of Fame
- Meet The Cast

- 12:15:2009 - [Royal Pet Club Featured in American Humane Review](#)
- Fall 2009 - [Filming in Central Park on Scene in the Pet Scene](#)
- Fall 2009 - [The National Humane Review writes about Prince Lorenzo Borghese and Royal Pet Club's Generous Donations with Free Orders](#)
- Fall 2009 - [Off Lead Animal & Behavior Magazine writes about Royal Pet Club](#)
- 09:11:2009 - [Organic Italian Virgin Olive Oil Instant Bath Spritz in Haute or Not at PetMD.com](#)
- 09:11:2009 - [People Pets Magazine writes about Prince Lorenzo Borghese and America's Next Top Dog: The Princess](#)
- September 2009 - [Orlando Style Magazine writes about Miss America's Outstanding Teen judged by Prince Lorenzo Borghese and of Summer 2009 - Royal Pet Club appears in ASPCA Action Magazine](#)



08:18:2009 - [Lorenzo Borghese on Fox News for America's Next Princess](#)
08:17:2009 - [Royal Pet Club appears on American Humane Web Site](#)
08:17:2009 - [Royal Pet Club appears on North Shore Animal League America Web Site](#)
08:17:2009 - [America's Next Top Dog: The Princess in the Daily News' Gatecrash](#)
08:14:2009 - [America's Next Princess on PIX Morning News](#)
08:13:2009 - [Bachelor Prince Lorenzo Borghese unveils fun new reality series in Nose to the Ground at fetchdog.com](#)
08:11:2009 - [Royal Pet Club appears in Haute or Not at PetMD.com](#)
08:04:2009 - [America's Next Princess in Haute or Not at PetMD.com](#)
07:31:2009 - [America's Next Princess on ABC News](#)
07:27:2009 - [Web-based show AmericasNextPrincess.com in The New York Post](#)
05:30:2009 - [Everyday with Rachael Ray](#)

05:28:2008 - [Lorenzo Borghese on ABC News](#)
05:05:2008 - [Royal Treatment on ABC News](#)
Spring 2008 - [Florida Dog 2008](#)
03:28:2008 - [ABC - Good Morning America](#)
03:07:2008 - [Royal Treatment on ABC News](#)
Winter:2008 - [Feature in Pet Product Scoop](#)

12:2007 - [Feature in Florida Monthly](#)
02:2007 - [Feature in Image](#)
Winter 2007 - [Feature in Pet Elite](#)
Fall 2007 - [Feature in Wired Pet](#)
06:04:2007 - [Feature in Cosmetic World](#)
01:12:2007 - [Feature in Home Accents](#)

2006 - [Lorenzo Borghese, founder of The Royal Treatment Italian Pet Spa, on Ellen](#)
2006 - [Feature in Animal Fair](#)
2006 - [Feature in People Magazine](#)
12:27:2006 - [Feature in Global Chic Fashion Magazine](#)
11:27:2006 - [Lorenzo Borghese, founder of The Royal Treatment Italian Pet Spa, on Live! with Regis & Kelly](#)
10:30:2006 - [Feature in Entrepreneurs.About.com](#)
10:20:2006 - [Lorenzo Borghese, founder of The Royal Treatment Italian Pet Spa, on Jimmy Kimmel](#)
10:16:2006 - [Lorenzo Borghese, founder of The Royal Treatment Italian Pet Spa, on The Insider](#)
10:2006 - [Feature in Pet Style News](#)
10:02:2006 - [Lorenzo Borghese, founder of The Royal Treatment Italian Pet Spa, on Live! with Regis & Kelly](#)

11:01:2005 - [Feature in Dog Fancy Magazine](#)
10:01:2005 - [Feature in BeautyNewsNYC.com](#)
2005 - [Feature in WWDBeautyBiz Magazine](#)
08:01:2005 - [Feature in Groomer to Groomer Magazine](#)

3:02:2004 - [New feature in Animal Wellness Magazine](#)

12:02:2003 - [Feature In Animal Wellness Magazine](#)
11:02:2003 - [Feature In Animal Fair Magazine](#)
10:27:2003 - [Feature In the Pampered Pet Section in Home Accents Today](#)
10:16:2003 - [Feature In the Fresh Picks Section in Quest Magazine](#)
09:14:2003 - [Before & After PIX](#)
08:30:2006 - [Feature in From House to Home](#)
07:01:2003 - [Royal Treatment Pet Products "Pampering Your Pooch" segment of WNBC-TV's TODAY IN NEW YORK](#)

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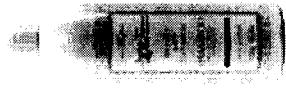


The Prince is back, but this time, he's a dog. Bond, a wealthy Maltipoo, is on a 10-week mission to find his Princess with former ABC Bachelor, Prince Lorenzo Borghese, at the helm. The new web 10-week reality series, which had been called "America's Next Princess," launched on August 17th at 8 PM Eastern, at www.americasnextprincess.com. **Viewers were shocked as they tuned in *not* to see Lorenzo Borghese find *his* next Princess, but rather to find an adorable maltipoo looking for *his* next Princess.** This clever and hilarious webisode series pokes fun of reality shows and celebrities using dogs as characters. Once the show aired, the name was properly changed to: "America's Next Top Dog, The Princess."

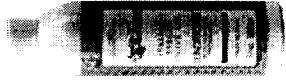
Borghese starred on the 9th season of ABC's *The Bachelor*, and found love. But it didn't last. Now, Borghese is the executive producer and co-creator of his own web reality series in **an effort to raise awareness and money for two of Borghese's favorite not-for-profit entities, one of which is North Shore Animal League America**, the world's largest no-kill animal rescue and adoption organization and the home of the *Mutt-i-gree™*, America's shelter dog. As pets are Borghese's passion, the episodes draw light upon animals and their importance to each and every one of us.

Borghese is aiming to combat the neglect of animals in these tough economic times by **donating \$1 to North Shore Animal League America for all other orders placed through August 17th, 2010 through his discount pet products retailer, RoyalPetClub.com.**

"This show is intended to make people laugh while bringing light on animals and contributing to causes that will give each and every animal a loving home," says Prince Lorenzo Borghese. "I really wanted to make a difference in the pet world, and what better way than draw light to these charities through humor," says Borghese. His RoyalPetClub.com will be showcasing the webisode series, and will be Prince Borghese's outlet to deliver funds to animal causes in these tough economic times.



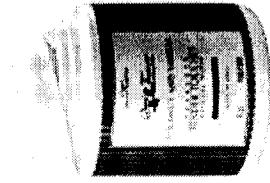
Honey and Oatmeal Shampoo 13.5 oz



Virgin Olive Oil Conditioner 8.4 oz



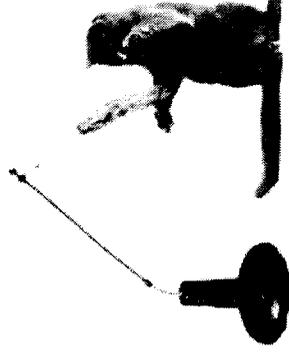
Lavender & Cashmere Bath Spritz 6.7 oz



Coconut and Vanilla Wipes



Hip & Joint Paw Gel



Swivel Squirrel

For more information about products from Royal Pet Club, please visit: www.royalpetclub.com

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The Prince And The Pawed Ones

When it comes to Royal Treatment, it takes one to know one.

Text: Katherine Labrecq

Prince Lorenzo Borghese, the son of the noble Italian family and modern day beauty dynasty, has set his sights on the realm of pet care and introduced a line of products to revolutionize it.

Dubbed Royal Treatment, the line launched in January 2003 with four products: honey oatmeal shampoo and conditioning spray with olive oil and Shea butter; liquid breath mints; and odor neutralizing spray. Borghese hit on the idea for the line, which is primarily skin-care focused, when he found nothing effective for his own dog—a black lab named Belle—who was suffering from dry, irritated skin.

Borghese's object was twofold: optimize pet comfort and help pets smell less like pets. Unfortunately, he found pet cleanliness could be at odds with pet comfort. "Our pets have trouble relinquishing their skin," Borghese explains, "because it isn't porous the way ours is." His Royal Treatment products, he says, are specifically pH-balanced for pets' skin and won't strip natural emollients, so pets can be bathed often. Moreover, his products rely on imported fragrance oils such as red currant from France for their fresh, natural scent. As a result, pets are walking-room deodorizers rather than lovable affronts.

Today, the Royal Treatment line has grown into a whole suite designed to improve your pet's quality of life, and includes nutritional supplements and beds made of orthopedic foam. The beds are available in toile, pink, micro velvet, and for pets who dream of soldier dais, backseat, bulldog, and more.



Reel Pets

The "Bachelor" Prince Talks About His Cosmetics Company, Love For Animals, And The Girl Of His Dreams



Mike is a handsome, successful actor who has appeared in the TV shows *Baywatch* and *Baywatch Nights*. He is also a successful businessman, having founded the cosmetics company *Y and Breezy*. He is also a devoted animal lover, and has adopted several dogs and cats.

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About.com® Entrepreneurs

Lorenzo Borghese: The Bachelor Prince, the Cosmetics Entrepreneur

From Scott Allen, former About.com Guide

Even without a title of "prince," Lorenzo Borghese would not fall into the category of "pauper." Recently in the news for his appearance on ABC's *The Bachelor: Rome*, Borghese is following in his grandmother's footsteps as a cosmetics entrepreneur and has created his own line of luxury bath and grooming products – only these are for pets.

Heritage:

Borghese's ancestors include Pope Paul V and Cardinal Scipione Borghese. His family has had an influence on Italian art, helping create St. Peter's Basilica. His family's name can be found throughout buildings in Italy, including the famed Villa Borghese, Rome's largest public park. Though Italian by birth, Borghese claims to only be able to speak "menu Italian." *The Bachelor* producers reportedly enrolled him in intensive Italian lessons before filming began.

Growing Up:

Although Borghese was born in 1972 in Milan, he only lived in Rome and Italy until he was five, when his family moved to Connecticut. He has lived in Manhattan since 1997. Borghese graduated from Rollins College in Winter Park, FL, and later received an MBA from Fordham University in New York.

The Family Business:

Borghese's ancestors created homemade cosmetics in their Italian gardens. His grandmother, Marcella Borghese created her own cosmetics, the Princess Marcella Borghese Cosmetics Line, which was eventually incorporated into cosmetics giant Revlon then later sold off to a group of Saudi investors in 1991.

The Royal Treatment:

When Belle, his black lab, did not respond well to other pet products, Borghese created his own, using all-natural ingredients in the family tradition. In 2003, Borghese started Royal Treatment, a line of luxury pet care products. Today, the company offers nearly 100 products ranging from shampoos and treats to beds and odor removers. The product development office remains in Italy but Borghese works from New Jersey. His products can be purchased from GetRoyalTreatment.com¹ and other outlets.

Borghese believes the key to success is having a good product that stands out from the many other pet products available. As founder and president of the company, he plays a prominent role in the selection of products to be produced. His company says Borghese is very hands-on, reviewing all labels and colors and smelling the products for approval. Future plans for Royal Treatment include expanding into Asia, launching new fragrances, and creating private label products for various pet stores.

Other Ventures:

Borghese's entrepreneurial side doesn't stop with pet cosmetics. Borghese is also a managing partner with his father, Francesco Borghese, at GT Partners, a private label Italian cosmetics company. This New Jersey company sells to major department stores. They have nine different cosmetics lines involving skin care treatment and bath and body products from Italy.

Borghese is also a director for Multimedia Exposure, Inc., a company that works with products for television shopping channels. His brother, Scipione (Skip), is the CEO of the company, which serves as an agent for Live and Taped DirecTV worldwide, specializing in television direct marketing, manufacturing and distributing of client products. MME is involved with manufacturing the raw products, managing the sales, and presenting them on air, both in infomercials and on the shopping networks.

Following in the Family Footsteps:

Sure, he's a prince, and now a famous prince after his appearance on *The Bachelor*. But Lorenzo Borghese still remains very active in his companies. All of his Royal Treatment products go through his New Jersey office for approval before hitting the market. Borghese's grandmother started an internationally known cosmetics line, and it's clear Borghese takes after her. Borghese shows that being an entrepreneur doesn't have to involve an entirely new idea – sometimes business success simply involves twisting a familiar business. GT Partners ships cosmetics worldwide. Royal Treatment still creates its recipes in Italy, using natural ingredients much like his ancestors and grandmother. Prince Borghese may be a prince and may be relying on a TV show to find his princess, but he's using his cosmetics history to help create a pet product empire.

This About.com page has been optimized for print. To view this page in its original form, please visit:

<http://entrepreneurs.about.com/od/famousentrepreneurs/p/lorenzoborghese.htm>

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Links in this article:

1. <http://www.getroyaltreatment.com/>

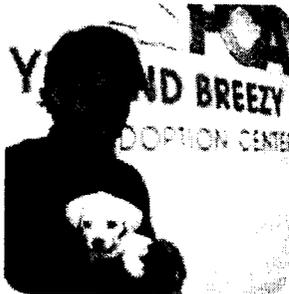


Press Release

"The Bachelor" Finds True Love: Prince Lorenzo Borghese Adopts ASPCA Pooch

November 14, 2006

ASPCA Media Contact



NEW YORK, November 14, 2006—Prince Lorenzo Borghese, also known as ABC-TV's "The Bachelor," has found true love—in the form of an 8-week-old mixed-breed puppy that he adopted from the ASPCA® (The American Society for the Prevention of Cruelty to Animals®) in Manhattan late Monday afternoon.

The pup arrived with its mother and sister at the ASPCA when it was just two days old and fostered until he was ready for adoption. Prince Borghese calls the pup "Porcini"—because he's as "cute as a little mushroom."

###

Founded in 1866, the ASPCA® (The American Society for the Prevention of Cruelty to Animals®) is the first humane organization established in the Americas and serves as the nation's leading voice for animal welfare. One million supporters strong, the ASPCA's mission is to provide effective means for the prevention of cruelty to animals throughout the United States. As a 501 [c] [3] not-for-profit corporation, the ASPCA is a national leader in the areas of anti-cruelty, community outreach and animal health services. The ASPCA, which is headquartered in New York City, offers a wide range of programs, including a mobile clinic outreach initiative, its own humane law enforcement team, and a groundbreaking veterinary forensics team and mobile animal CSI unit. For more information, please visit www.asPCA.org.

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Related Releases

[ASPCA, Pet Airways Transfer Rescued Dogs from Mississippi Puppy Mill to New York City for Adoption Sunday, February 07, 2010](#)

[ASPCA Responders on Scene in Clarksdale, Miss. Sunday, January 24, 2010](#)

[ASPCA Mobile Adoption Center Brings Pets to People This February](#)
Wednesday, January 20, 2010

[ASPCA Makes Airlifted Dogs from "Operation Chihuahua" Available for Adoption](#)
Tuesday, January 12, 2010

[ASPCA Receives Homeless Pooches from California in "Operation Chihuahua"](#)
Tuesday, January 05, 2010

[ASPCA Awards Grant to Help the Alaska SPCA's Homeless Animals](#)
Monday, December 21, 2009

[ASPCA Mobile Adoption Center Brings Pets to People In Manhattan and Brooklyn This June](#)
Sunday, May 17, 2009

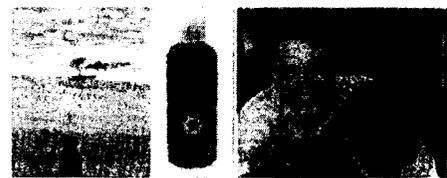
[ASPCA Celebrates "Adopt-A-Shelter Cat Month" this June](#)
Monday, May 11, 2009

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The screenshot shows the BeautyNewsNYC.com website. At the top, there is a navigation menu with links for 'HOME', 'ABOUT US', 'CONTACT', 'ADVERTISE', and 'ALBUMS'. A search bar is located to the right of the menu. Below the menu, there are several circular icons representing different categories: MAKEUP, SKIN CARE, HAIR CARE, BEAUTYCONNA, HEALTH & FITNESS, HOW TO, WITH, ON PETS, and TRAVEL & SPA. The main content area features a featured article titled 'metro pets' with a sub-headline 'The Big 5 Evolution' and 'By Sharon Givens Thomas'. Below the article title is a photograph of a dog sitting on a beach. To the right of the article, there is a sidebar with a 'GO' button.

Royal Treatment Natural Pet Formulas (www.getroyaltreatment.com) is the latest product of Purina, Lescage, Burghese, graduation of cosmetic chemist Purina, Marcello Burghese, Lopez is a natural Royal Treatment two years ago for his dog, Belle after intensive research and backed family connections to develop and define the finest ingredients from around the world. The result is a line of pet products of exceptional quality. That is more like a spa treatment for dogs.



Any shampoo can claim that it is natural - the Food and Drug Administration doesn't regulate pet products outside of its mandate. Also, pet shampoos are not required to list the ingredients on the label. However, the Royal Treatment Natural Pet Formula is carefully crafted to be natural products. They formulate the premium human grade organic ingredients with no harsh chemicals. The natural products Honey, Glycerin, Omega and Oatmeal. Treats for skin conditions. The natural ingredients include a plus Squalene and Glycerin have the effect of the result of shampooing and are not required.

With the natural pet formula treatment, always to make it this safe but, as the water, but you can further take care with the Golden Glycerin Shampoo. The formula is also safe for your pet's skin. These items are essential to help your pet's skin.

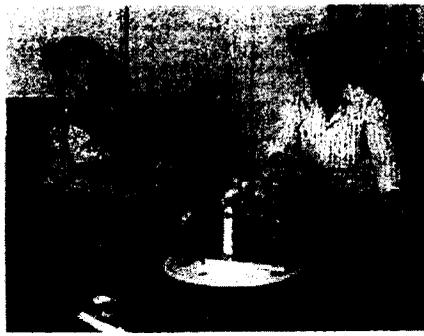
As the summer is coming, you will be taking your dog to the beach. You should have a shampoo that will help take care of your dog's skin.



Royal Treatment and other beauty, nutrition and health products available at www.getroyaltreatment.com

Also available at
 Posh Paws, Inc. 1000
 131 2140-5769
 1750 3rd Ave.
 New York, NY 10028

BeautyNewsNYC.com



Water Mikki Moustaki interviews Borghese about his product line

Bachelor from Cover

Max's fall, he'll... who has had only this skin. He wanted a shampoo that worked for him, and because his family is in the beauty product business—Parfums Christiano Dior, the House of Bodyline, and others—he wanted to be made a custom one. I came from my dog.

Premier Doggy Cosmetics

It's a shame that I'm not a dog, because I could have had the best skin. I had dry skin, and I was considering my family as a customer. I was sort of embarrassed, but my dog looked bad and was insecure. I couldn't say Borghese.

I had the treatment and I had



Borghese's pets were inspiration for The Royal Treatment spa line.

dog that needed products. I was living in an apartment in New York City, and I hated walking into my place and smelling dog. He says, "I know that stinky perfume. I know because I had a dog, and I thought, why aren't I had something out there that works? I knew what I needed for my dog and that."

Borghese was attending Cornell Business School in New York City. A former major when he first thought of getting into cosmetic products. He created a business plan for the pet industry as an entrepreneur class and saw that it was growing at 15 percent a

year. Additionally, he felt he could make a better product than anything else he could find.

His family had been selling its products on the Home Shopping Network for years, so he knew how to sell with one sharp eye and one blunt, and they were the marketing segment of the business. Today, the Royal Treatment spa line products are in stores, including Wal-Mart, Target, and Amazon, and Borghese creates a new line of products every six months.

"I have 26 different fragrances," says Borghese. "The smells often come from Madagascar, and the real scents are grown in France. I love creating new formulas, and I love the research and development part of it, too."

Honestly, I also get really fed up with the industry. It's not FDA regulated, like human cosmetics. Someone could say they have a natural product, and in the marketplace, it's a common honey, alcohol, essential, but obviously those aren't the only things in the product. You can't make a shampoo that way. Most of these are human-therapeutic, and they're sold everywhere and all in a pet shampoo. Pets and people have different skin."

Borghese found a way to make something new for pets. "Remember how the vet used to say not to bath your dog more than once a month because it's bad for his skin? Well, it used to be that way because the shampoo dried the skin. This is my process, creating something from scratch, like making Thai-spring onions. It's great when it works."

A Royal Family Heritage

The first pet direction on the dog's treatment, three pet bottles were created: pet crown, a gift to Borghese'soyal one, and finally he says that he gets credit from consumers who don't understand that the industry is not supposed to be there.

The Borghese family became Italian royalty in the early 1900s, when Pope Pius and Borghese gave his family royal titles. They were among the largest property

holders in Rome and with property came privileges. But though he is quick to point out that royal titles in Italy don't come with any power.

"The first time I saw someone like me," he says, "I also have a piece of my own strength because of my credit card. I don't have a bank and growing up I would never say anything to anyone about it. I knew all my friends are rich, and they're saying, 'Is this a joke?' I said, 'It's not a joke, it's real. It can use it for the rest of your life, please. It's not a joke, it's real.'"

All in a Day's Work

It's not enough to think that the life of a prince would be easy. It's not from your average pet shampoo magazine life. But Borghese gets up in the morning

new products, new scents, when samples they're going to send me, new artwork, new graphics."

Because Borghese has his own shows on ESN, he writes them, does every single bit together and tracks inventory.

"I'm not about every three months, three two-hour shows. I schedule meetings with all the stores. I'm not supposed to copy-paste, what I'm doing all day. But when I'm not working, my wife is being very busy."

Borghese is about to get a lot of business. It has been chosen as the new face of an AKA. "The industry" scheduled to begin in the middle of the summer.

"I have not even thought about the show," he says. "I have so much work to do before I leave. I think it's going to be fun, but I



Borghese spends a lot of time each day corresponding with Italy.

can't. But I guess if it was easy everyone would do it." He says, "I've learned that working in the

A Day in the Life of an Italian Prince
Owner of The Royal Treatment becomes the next TV Bachelor

By Kelly S. ...

It's not enough to think that the life of a prince would be easy. It's not from your average pet shampoo magazine life. But Borghese gets up in the morning



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Rouging the fine prince, Lorenzo Borghese in Rome with romance-minded Kim.

The Bachelor: Rome

ABC (Mondays 9pm ET)

REALITY As a reality franchise, *The Bachelor* might be getting overripe. A damp ugliness is beginning to seep out. This time the eligible man has the cachet-licious name and title of Prince Lorenzo Borghese. He's aristocratically slim, but he grew up from the age of 5 in Connecticut, and as an adult he founded a company called Royal

Treatment Pet Spa. That probably won't end up being chiseled into the ancient Borghese family crest in St. Peter's Basilica.

The premiere seemed more degenerate than romantic, with malcontent wannabe princesses peering down from a balcony as our boy Borghese, in the leafy garden below, flirted with several women. When some Italian beauties were ushered in as surprise rivals, the Americans looked as if they were ready to start clacking their tongues and letting loose some sort of primal sexual shriek. ★ 2

EXHIBIT D

To Second Declaration of Lorenzo Borghese

Applicant's Reply Memorandum of Law in Further Support
of Applicant's Motion for Summary Judgment

Borghese Trademarks, Inc. v. MultiMedia Exposure, Inc., No. 91189629

La Dolce Vita consists of scientifically formulated bath and body products for pets. All recipes are created in the hills of Italy using the highest quality ingredients from Mother Nature. This shampoo combines hydrating Milk Proteins, Italian Vanilla and a host of nature's finest ingredients for healthy looking skin and a clean, soft coat. Your best amico will be left incredibly clean and smelling magnifico! Ahhh...welcome to the good life! **TO USE:** Wet coat thoroughly with warm water. Apply liberally and massage. For irritated areas, dab onto skin and leave for two minutes. Rinse with warm water and towel dry. For best results, follow with Vanilla Bean and Milk Conditioner and refresh coat with Vanilla Bean and Milk Bath Spritz. **CONTAINS: Milk Protein, Oat Protein, Silk Protein, Almond Protein and Vanilla.**

WARNING: FOR TOPICAL USE ON ANIMALS ONLY. DISCONTINUE USE IF IRRITATION DEVELOPS. KEEP OUT OF REACH OF CHILDREN. STORE AT ROOM TEMPERATURE. AGAINST CRUELTY TO ANIMALS.

INGREDIENTS: AQUA (WATER), MAGNESIUM LAURETH SULFATE, PARFUM, PEG-120 METHYL GLUCOSE DIOLEATE, DISODIUM LAURETH SULFOSUCCINATE, PPG-26-BUTETH-26, PEG-40 HYDROGENATED CASTOR OIL, COCAMIDOPROPYL BETAINE, LAURETH-2, PEG/PPG-120/10 TRIMETHYLOLPROPANE TRIOLEATE, MAGNESIUM SULFATE, BUTYL METHOXYDIBENZOYLMETHANE, ETHYLHEXYL METHOXYCINNAMATE, VANILLA PLANIFOLIA EXTRACT, HYDROLYZED MILK PROTEIN, HYDROLYZED OAT PROTEIN, HYDROLYZED SILK, HYDROLYZED SWEET ALMOND PROTEIN, MAGNESIUM NITRATE, MAGNESIUM CHLORIDE, METHYLCHLOROISOTHIAZOLINONE, METHYLISOTHIAZOLINONE, DEXTRIN, CI 15985 (FD&C YELLOW NO.6).



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www.getroyaltreatment.com
www.nuzzleplanet.com



La Dolce Vita consists of scientifically formulated bath and body products for pets. All recipes are created in the hills of Italy using the highest quality ingredients from Mother Nature. This bath spritz combines hydrating Algae Peptides and Marine Trace Minerals to moisturize the skin and soften the coat, keeping it smooth and shiny. Quick-drying and suitable for daily use, it keeps your dog refreshed, smelling fantastico and living the good life in between baths. **TO USE:** Shake product well and mist entire coat until lightly damp. Stroke through gently with soft bristle brush, comb or hand. Rinsing is not required. **CONTAINS:** Algae Peptides, Marine Trace Elements, Aloe Vera, Cucumber and Silk Proteins.

WARNING: PRODUCT IS BEST SUITED FOR DOGS. FOR TOPICAL USE ONLY. DISCONTINUE USE IF IRRITATION DEVELOPS. KEEP OUT OF CHILDREN'S REACH. STORE AT ROOM TEMPERATURE. AGAINST CRUELTY TO ANIMALS.

INGREDIENTS: AQUA (WATER), PARFUM (FRAGRANCE), PEG-40 HYDROGENATED CASTOR OIL, PEG/PPG-20/6 DIMETHICONE, COCETH-7, PPG-1-PEG-9 LAURYL GLYCOL ETHER, DMDM HYDANTOIN, ALOE BARBADENSIS EXTRACT (LEAF) EXTRACT, ETHYLHEXYL METHOXYCINNAMATE, IODOPROPYNYL BUTYLCARBAMATE, GLYCERIN, CARRAGEENAN (CHONDRUS CRISPUS), SORBITOL, CUCUMIS SATIVUS EXTRACT (CUCUMIS SATIVUS (CUCUMBER) FRUIT EXTRACT), MANNITOL, SODIUM CHLORIDE, HYDROLYZED SILK, HYDROLYZED ACTIN, CALCIUM GLUCONATE, GLUCOSAMINE HCL, SODIUM GLUCURONATE, CI 42090 (FD&C BLUE NO.1).



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