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

Proceeding	91189629
Party	Plaintiff Borghese Trademarks Inc.
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Submission	Other Motions/Papers
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Signature	/Moira J. Selinka/
Date	08/04/2010
Attachments	TTAB letter 080410.pdf (3 pages)(111467 bytes)

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PLEASE RESPOND TO THE NEW JERSEY ADDRESS
EMAIL: M.SELINKA@BR-TMLAW.COM

August 4, 2010

Via ESTTA filing
U.S. Patent and Trademark Office
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

RE: Opposition No. 91189629
Mark: PRINCE LORENZO BORGHESE'S LA DOLCE VITA
Borghese Trademarks, Inc. v. Multi Media Exposure, Inc.

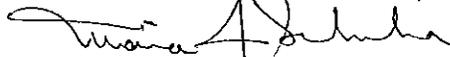
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Dear Sir/Madam:

Pursuant to the August 3, 2010 letter filed by Applicant's counsel in this matter, and in the interest of providing a complete picture of the situation for the Board, Opposer hereby submits a copy of its August 4, 2010 reply to the statements made in Applicant's counsel's letter.

Sincerely,

BAKER AND RANNELLS, P.A.



Moira J. Selinka

/ms
Encl.

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August 4, 2010

Via First Class Mail
& Email: robertraskopf@quinnemanuel.com
Robert L. Raskopf, Esq.
Quinn Emanuel Urquhart & Sullivan, LLP
51 Madison Avenue, 22nd Fl.
New York, NY 10010

RE: Opposition No. 91189629
Mark: PRINCE LORENZO BORGHESE'S LA DOLCE VITA
Borghese Trademarks, Inc. v. Multi Media Exposure, Inc.

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Dear Mr. Raskopf:

We are in receipt of your July 29, 2010 letter and your August 3, 2010 filing with the Board. Thank you for correctly numbering Applicant's responses. However, the renumbering does not cure the material deficiencies in Applicant's discovery responses which were explained in Opposer's Reply in Support of Its Motion to Compel. Nor does the renumbering cure the lateness of Applicant's responses to Opposer's admission requests which are still deemed admitted. Finally, in regard to exchanging documents by mail, we direct you to Mark Kaufman's (Applicant's former counsel in this matter) June 16, 2009 email agreeing to Opposer's proposal that discovery procedures be amended to allow for the mailing of documents.

Sincerely,

BAKER AND RANNELLS, P.A.



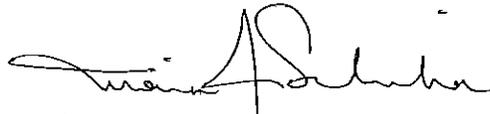
Moira J. Selinka

/ms

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Opposer's August 4, 2010 letter to the Trademark Trial and Appeal Board, in re Borghese Trademarks, Inc. v. Multi Media Exposure, Inc., was forwarded by first class, postage prepaid mail by depositing the same with the U.S. Postal Service, and was forwarded via email, on this 4th day of August, 2010, to the attorney for the Applicant at the following address:

Robert L. Raskopf, Esq.
Quinn Emanuel Urquhart & Sullivan LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010
robertraskopf@quinnemanuel.com

A handwritten signature in black ink, appearing to read "Moira J. Selinka", written over a horizontal line.

Moira J. Selinka