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

Proceeding	91197504
Party	Defendant Alpha Phi Omega
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Attachments	ReplyReRenewedMTCompel.pdf(142330 bytes ) Segment 001 of Exhibit E.pdf(1678811 bytes ) Segment 002 of Exhibit E.pdf(1744785 bytes )

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

**OMEGA, S.A.,**

**OPPOSER,**

v.

**ALPHA PHI OMEGA,**

**APPLICANT.**

**Opposition Nos.  
91197504 (Parent) &  
91197505 (Child)**

**Serial Nos.  
77950436 & 77905236**

**REPLY TO OPPOSER'S RESPONSE TO  
RENEWED MOTION (1) TO COMPEL DISCOVERY AND  
(2) TO TEST SUFFICIENCY OF RESPONSES TO REQUESTS FOR ADMISSION**

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Opposer's adoption and use of the OMEGA word and  $\Omega$  symbol marks apparently dates back to 1894. Over the last 120, use of those marks has co-existed with dozens of collegiate fraternities and sororities with the word OMEGA in their names including (1) Alpha Tau **Omega**, (2) Alpha Chi **Omega**, (3) Chi **Omega**, (4) Alpha Gamma **Omega**, (5) **Omega** Chi, (6) Sigma Phi **Omega**, (7) Kappa **Omega** Tau, (8) Gamma Epsilon **Omega**, (9) Beta **Omega** Phi, (10) Sigma Phi **Omega**, (11) Alpha **Omega** Epsilon, (12) **Omega** Delta Phi, (13) Alpha Nu **Omega**, (14) Lambda Tau **Omega**, (15) **Omega** Chi, (16) **Omega** Phi Beta, (17) Gamma Phi **Omega**, (18) Sigma **Omega** Epsilon, (19) Alpha Pi **Omega**, (20) **Omega** Phi Gamma, (21) Sigma **Omega** Nu, (22) Alpha Sigma **Omega**, (23) Delta Phi **Omega**, (24) Delta Pi **Omega**, (25) **Omega** Chi Psi, (26) Sigma Kappa **Omega**, (27) Sigma **Omega** Phi, and (28) Alpha **Omega** Sigma.

Indeed, the use of names containing the word OMEGA by at least two of these organizations pre-date Omega Watch, namely the Alpha Tau Omega Fraternity which has existed since 1865 and the Alpha Chi Omega Sorority which has existed since 1885. The Chi

Omega Sorority has existed since 1895, thus give or take a few months, it has coexisted with Omega Watch from its outset.

Applicant, the Alpha Phi Omega National Service Fraternity was founded and has continuously been in operation since 1925. The basic design of its membership badge – a jewelry pin – was created by the fraternity’s founders in 1925. The design of the badge, shown here has remained essentially unchanged since the founding of the fraternity.

See Robert London Depo., Applicant’s Exhibit F at p.113. Applicant registered this configuration of its ΑΦΩ insignia for assorted jewelry lines in 1929. See Opposer’s Exhibit 9. Opposer offers conjecture that



because the registration lapsed in 2000 due to neglect to apply for renewal necessarily evidences the mark might have been abandoned. The more likely assumption Opposer should have drawn from the lapse of the registration is that fraternities and sororities are non-profit organizations that rely a great deal on volunteer labor and typically have no one assigned to monitor and renew registrations and thus the registration was inadvertently allowed to lapse. Indeed, as testimony confirms, Applicant has continuously used its ΑΦΩ insignia on jewelry since 1925.

Notwithstanding nearly 120 years of Opposer’s coexistence with fraternities and sororities with OMEGA in their name, and nearly 90 years coexistence with Applicant with no known instances of confusion, indications are Opposer has decided to bully any collegiate fraternity or sorority with the word, OMEGA in its name contending that use by a fraternity or sorority of the Greek alphabet reference OMEGA is confusingly similar and dilutive of Opposer’s marks. For example, it has similar proceedings pending in the TTAB against the Lambda Tau Omega Sorority (Proceeding No. 91208652), the Omega Psi Phi Fraternity (Proceeding No. 91197082), and Alpha Omega Epsilon (Proceedings No. 91214449, 91214452,

91214453 & 91214454), and it unsuccessfully sought an extension to oppose the Psi Sigma Omega Service Fraternity (Serial No. 78739642), and successfully bullied Omega Delta Phi into abandoning the application to register its name (Proceeding No. 91186613).

We propounded fundamental discovery requests seeking any bases for the contention Alpha Phi Omega's insignia create a likelihood of confusion and, specifically going to the question of the strength of Opposer's marks, requests for them to admit that the word OMEGA and Greek alphabet letter, Ω are widely used in the names of collegiate fraternities and sororities, a fact one would think Opposer would admit considering the multiple TTAB filings it has made against fraternities and sororities with the word OMEGA in their name. The fundamental discovery requests were calculated to make Opposer "either put up or shut up." Instead it did neither, it proceeded to ignore and evade, rather than provide any honest answers to virtually every one of the discovery requests.

The Request for Admissions were straight-forward, simple, and specific. Virtually all of the requests were merely that Omega admit it has no basis to dispute some extremely simple basic facts, many relating to facts so well-known and incontrovertible that the TTAB could likely take judicial notice thereof. *See Applicant's Exhibit C, Responses to Request for Admission.* Instead, Omega expressly denied 46 of the 48 requests. It would only admit that the Greek Alphabet letter, Ω is pronounced "Omega" and that Opposer does not "advertise or market" its products in the "Greek Affinity Products Market." *Id.* at Responses to Request for Admission Nos. 2 and 13. Although denying 46 of the 48 requests for admission, rather than explain whether there is any factual basis for the denials, opposer obfuscates and even objects to the interrogatory directing it to explain its basis for any denials. *See Applicant's Exhibit A, Responses to Interrogatories at Interrogatory No. 15.*

Rather than provide narrative responses, *See Applicant's Exhibit A*, Opposer stated it would "make documents available responsive to" various of the interrogatories." Likewise in response to Request for Production , *See Applicant's Exhibit B*, Omega stated that it "will make responsive documents available." Notwithstanding the representation it would make available these records, Omega did not do so. Instead, they dumped approximately 2900 documents on us none of which appear to provide **anything** actually responsive to the interrogatories and document requests.

In summary, rather than "put up or shut up," Opposer denies 46 of 48 Requests for Admissions, objects to the interrogatory directing it to explain the bases for the denials, postures that it will produce responsive documents. Then, rather than do so, they dump approximately 2900 documents on us none of which appear to provide **anything** actually responsive to the requests. In short, Opposer ignores and evades virtually every one of the discovery requests.

Opposer's response to the current motion is little more than an extended and irrelevant narrative of the chronology of this proceeding and rambling rhetoric relating to why it should not be required to provide the requested discovery. Opposer takes little if any issue with our concern about the document production being nothing other than a non-responsive document dump. The only portion of Opposer's response brief directly touching on this issue is its assertion its supplemental response to Interrogatory No. 12 identifies responsive documents. *See Applicant's Exhibit A-1*. This Interrogatory directed Opposer to identify and describe any evidentiary basis supporting "any contention the commercial impression generated by the use of Applicant's Crest [the coat-of-arms] on products in the market in which those products pass is likely to be recognized as an identification or association with Opposer or its products." In its initial response, Opposer stated it would "make documents available responsive to this interrogatory."

Following our objection to the document dump, Opposer supplemented its response identifying documents *it says* are responsive, namely Documents OSA 1814-1826, 1828-1829, 1897-1873, 1968-1978, 1991-1994, 2011-2014, 2086-2115, 2120-2123, 2128-2133, 2140-2143, 2148-2158, 2161-2166, 2231-2232, 2242, and 2248-2249. *See also* Opposer's Response brief at p. 7. Each of these documents are reproduced in Applicant's Exhibit E to this memoranda. Lest there be any doubt whether Opposer's production was anything other than a document dump, a review of these specific documents shows that *none of them* are at all responsive to the interrogatory directing Opposer to identify and describe any evidentiary basis supporting "any contention the commercial impression generated by the use of Applicant's Crest [the coat-of-arms] on products in the market in which those products pass is likely to be recognized as an identification or association with Opposer or its products." Most of the documents are merely print-outs from Opposer's website showing assorted cufflinks, necklaces, rings, and money clips marketed by Opposer plus photographs of a few other products produced by Opposer. *None of these documents* have anything at all to do with whether "the commercial impression generated by the use of Applicant's Crest [the coat-of-arms] on products in the market in which those products pass is likely to be recognized as an identification or association with Opposer or its products." It is merely a nonresponsive document dump.

It is clear Opposer has been nothing but evasive in its discovery responses, it denies 46 of 48 Requests for Admissions, objects to the interrogatory directing it to explain the bases for the denials, postures that it will "make documents available responsive" to the interrogatories, and in response to the Requests for Production also postures it "will make responsive documents available." Rather than do so, they dump approximately 2900 documents on us none of which appear to provide *anything* actually responsive to the requests.

1. DEFICIENT RESPONSES RELATING TO LIKELIHOOD OF CONFUSION ISSUES.

Interrogatory No. 6 directs Opposer to identify and describe any evidentiary basis supporting the allegations the marks “sought to be registered will cause confusion, mistake and deception” with Opposer’s mark. *See* Exhibit A. In response, Opposer has identified no persons, nor documentary materials supporting its likelihood of confusion claim and refuses to do. This is fundamental information which should be provided in discovery and Opposer has not done so.

Interrogatory No. 12 directed Opposer to identify and describe any evidentiary basis supporting “any contention the commercial impression generated by the use of Applicant’s Crest [the coat-of-arms] on products in the market in which those products pass is likely to be recognized as an identification or association with Opposer or its products.” Rather than explain any such contention, they dump approximately 2900 documents on us none of which appear to provide *anything* supporting any such contention

We also propounded routine, specific, Requests for Admissions relating to the likelihood of confusion issue and some of the pertinent likelihood of confusion factors including requests that Omega admit the following:

- Opposer “has no evidentiary basis to dispute that products bearing the opposed mark[s] are primarily and predominantly marketed only to members of the Alpha Phi Omega National Service Fraternity, or to persons wishing to acquire the products as gifts for members of” the fraternity. *See* Exhibit C, Request No. 7
- Opposer “has no evidentiary basis to dispute that the commercial impression generated by use of [the opposed marks] in the market in which those products pass is recognition of the mark by the target consumers as a reference to the Alpha Phi Omega National Service Fraternity.” *See* Exhibit C, Request No. 8
- Opposer “has no evidentiary basis to support any contention any relevant consumer has been confused, mistaken, or deceived into suspecting [that products marketed under the marks in issue] was merchandise produced or marketed by or on behalf of Opposer, or otherwise sponsored or approved by Opposer.” *See* Exhibit C, Request No. 9.

- Opposer “has no evidentiary basis to support any contention any appreciable amount of relevant consumers have been confused, mistaken, or deceived into suspecting [that products marketed under the marks in issue] was merchandise produced or marketed by or on behalf of Opposer, or otherwise sponsored or approved by Opposer.” *See* Exhibit C, Request No. 10.
- Opposer “has no evidentiary basis to support any contention target consumers . . . associate [Applicant’s products] with Opposer.” *See* Exhibit C, Request No. 11.
- Opposer “has no evidentiary basis to support any contention Applicant is attempting to trade on Opposer’s reputation or is otherwise attempting to create any consumer association between products bearing any insignia of the Applicant and products marketed under the marks upon which the Opposition is based.” *See* Exhibit C, Request No. 48.

Opposer responds to each of these focused and pertinent requests with denials, along with assorted inapplicable boilerplate objections such as objections the requests are irrelevant and not calculated to lead to the discovery of admissible evidence, and are “overly broad. In addition to the boilerplate inapplicable objections, Opposer also affirmatively DENIED each of these Requests, apparently with no actual basis for doing so. The suspect nature of the denials is emphasized when considered in conjunction with Omega’s deficient responses to the Interrogatories and Request for Production. For instance, Interrogatory No. 15 inquired as follows:

Itemize, identify, and describe in detail any testimonial or other evidentiary basis supporting Opposer’s denial of any of the Requests for Admissions propounded with these Interrogatories and in relation to each, identify by name, address, occupation and telephone number any person’s with personal knowledge of same.

*See* Exhibit A. Parallel with that Interrogatory, Request for Production No. 21 directed Omega to produce the following:

Any and all documents and things forming the basis for Opposer’s denial, in whole or in part, of any of the Requests for Admissions propounded with these Requests.

*See* Exhibit B. Opposer has failed to, and actually refuses to identify or produce **anything** in

response to these requests. As for each of the denied Requests for Admission set forth above, all that was requested was that Omega admit *it has no evidence to dispute* the specific subjects identified in the requests, or *no evidentiary basis to support any specific contentions*. Because Omega uniformly denied each of these Requests, it is thus asserting that *it does* have evidence to support its position relating to each of the specified subjects. If the “denials” are accurate, then where is the evidence upon which the denials are based?

In summary, If indeed Omega does have any documents or other basis supporting its denials of these requests, then it should be compelled to fully and accurately respond to Interrogatory No. 15 and Request for Production No. 21 to identify those bases and provide the supporting information. If it cannot do so, then it does not have any *actual* bases for denying any of these Request for Admissions, the denials are false, the responses are insufficient and the requests should be deemed admitted.

**2. DEFICIENT RESPONSES RELATING TO WHETHER THE MARKS UPON WHICH THE OPPOSITION ARE BASED ARE DISTINCTIVE ENOUGH TO BE FAMOUS FOR DILUTION PURPOSES .**

By claiming dilution, Opposer raises the question of whether its marks enjoy the requisite “distinctiveness” and “substantial exclusivity” to be famous for dilution purposes. *See* 15 U.S.C. § 1125(c)(2)(B) .

As noted above, and in our opening brief, there are dozens of fraternities and sororities with the word “Omega” in their name. Opposer has actually made filings with the TTAB adverse to various fraternities and sororities seeking to register marks containing “Omega” in their name. Opposer’s contention that use by a fraternity or sorority of a name containing the Greek alphabet reference OMEGA is confusingly similar and dilutive of Opposer’s marks is a self-destructive position; the logical consequence of this position is the inference the marks upon which the Oppositions are based are too weak to be diluted, much less infringed, in light of the widespread

utilization by dozens of fraternities and sororities of names containing the Greek alphabet reference OMEGA, *especially considering many such uses* of OMEGA in fraternity names even predate Opposer's adoption of its marks.

If trial is necessary, we will be offering proof that dozens of fraternities and sororities use the word "Omega" in their name, including various such continuing uses which actually predate Opposer's adoption of its marks. We propounded various Requests for Admission for Opposer to admit it has no basis for denying our contentions along these lines. *See* applicant's Exhibits C and C-1 at Request nos. 1, 3, 4, 12, 14 & 16-46. Opposer DENIED every single one of these requests. Opposer did serve "amended" responses, *see* Exhibit C-1, but rather than cure the deficiencies in the initial responses, Opposer merely added an additional deficient "Lack of knowledge sufficient to admit or deny" these requests.

It attempts to do so are a misuse of the "lack of knowledge" excuse to deny a request for admission. The "lack of knowledge" excuse is only acceptable when the responding party has conducted a *reasonable inquiry relating to the requested fact*, remains unable to ascertain the truth of the request and states that the party lacks knowledge following such a reasonable inquiry. FED. R. CIV. P. 36(a)(4). Opposer's position is that it may use the "lack of knowledge" excuse with no obligation to investigate when the requests for admission go to the question of use of confusingly similar marks by third parties. To so contend though is a mistaken exaggeration of the no duty to investigate rule. Granted the Board does hold that a party need not conduct any *external* investigation of alleged third party uses of a confusingly similar mark. Nonetheless, a party is required to conduct an *internal* investigation before it may rely on the "lack of knowledge" excuse. "[T]here can be no doubt that information concerning third-party uses and registrations may be relevant to show that a mark, or a portion thereof, is weak." *Oral*

*Surgeons v. Oral and Maxillofacial Surgeons*, 201 USPQ 531, 533 (TTAB 1979). Considering the pertinence of this evidence, a party is required to conduct an internal investigation before it may rely on the “lack of knowledge” excuse. “[T]he Board has now come to believe that a party should be required to furnish information as to third party uses or registration by third parties of same or similar marks for the same or closely related goods and services . . . *to the extent that he has actual knowledge thereof.*” *Id.* at 534 (emphasis added).

Indeed, the very wording of the requests does not even require external investigation. We did not request that Omega ***admit that the word Omega has been so used*** by each of various fraternities identified in Request Nos. 16–46. Rather, we asked them to merely admit they have ***no evidentiary basis to dispute*** these uses. By claiming they have no knowledge one way or the other on the subject is thus a tacit admission Omega ***has no evidentiary basis to dispute*** the facts recited in these requests. It requires only an internal investigation to truthfully respond to these requests.

## CONCLUSION

Applicant is entitled to the requested discovery. Accordingly, we respectfully request that the board grant the relief summarized in the conclusion to our initial brief in support of this motion.

Respectfully requested,

*/jackawheat/*

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Louisville, Kentucky 40202-3352  
Telephone: (502) 587-3400

Counsel for Alpha Phi Omega

**CERTIFICATE OF SERVICE AND ELECTRONIC SUBMISSION**

I hereby certify that a true copy of this REPLY TO RESPONSE TO OPPOSER'S RESPONSE RENEWED MOTION TO (1) TO COMPEL DISCOVERY AND (2) TO TEST SUFFICIENCY OF RESPONSES TO REQUESTS FOR ADMISSION is being filed electronically with the U.S. Patent and Trademark Office using the ESTTA service, and a copy has been served on counsel for Opposer by mailing said copy this 19th day of February, 2014, via First Class Mail, postage prepaid, to:

Jess M. Collen  
Thomas P. Gulick  
Oren Gelber  
COLLEN IP  
The Holyoke-Manhattan Building  
80 South Highland Ave.  
Ossining, New York 10562

/jackawheat/  
\_\_\_\_\_  
Jack A. Wheat

AL169:00AL1:965466:1:LOUISVILLE

Applicant's  
Exhibit E



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OMEGAMANIA  
RINGS

ref: R24BGA02003XX

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**DESCRIPTION**

Ring Omegamania I Love You in 18k red gold  
with diamonds



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## OMEGAMANIA RINGS

ref: R25BCA02003XX

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### DESCRIPTION

Ring Omegamania I Love You in 18k white gold  
with diamonds and white enamel



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OMEGAMANIA  
RINGS

ref: R26BCA02003XX

---

**DESCRIPTION**

Ring Omegamania I Love You in 18k white gold  
with diamonds and black enamel



---

OMEGAMANIA  
RINGS

ref: R35STA02001XX

---

**DESCRIPTION**

Ring Omegamania Gents in stainless steel

Ω  
OMEGA



---

OMEGAMANIA  
NECKLACES

ref: P80BMA0200105

---

**DESCRIPTION**

Necklace Omegamania Heart in 18k white and red gold with one diamond



---

OMEGAMANIA  
CUFFLINKS

ref: C83STA0200105

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**DESCRIPTION**

Cufflinks and keyholder Omegamania in stainless steel



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OMEGAMANIA  
CUFFLINKS

ref: C83STA0200205

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**DESCRIPTION**

Cufflinks Omegamania Symbole in stainless steel with diamonds



---

OMEGAMANIA  
CUFFLINKS

ref: C89DGA0200105

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**DESCRIPTION**

Cufflinks in stainless steel and 18kt RG



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OMEGAMANIA  
CUFFLINKS

ref: C88STA0205105

---

**DESCRIPTION**

Cufflinks Omegamania in stainless steel and pink resin



---

OMEGAMANIA  
CUFFLINKS

ref: C88STA0205305

---

**DESCRIPTION**

Cufflinks in stainless steel with grey resine



---

OMEGAMANIA  
CUFFLINKS

ref: C88STA0205005

---

**DESCRIPTION**

Cufflinks Omegamania in stainless steel and green resin



---

OMEGAMANIA  
CUFFLINKS

ref: C88STA0205205

---

**DESCRIPTION**

Cufflinks in stainless steel with purple resin



---

OMEGAMANIA  
ACCESSORIES

ref: K90STA0200105

---

**DESCRIPTION**

Key ring in stainless steel

Ω  
OMEGA



---

SEDNA  
NECKLACES

ref: N65BBA0400105

---

**DESCRIPTION**

Gold chain in 18k yellow gold



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SEDNA  
NECKLACES

ref: N65BCA0400105

---

**DESCRIPTION**

Gold chain in 18k white gold



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AQUA  
CUFFLINKS

ref: C85STA0500105

---

**DESCRIPTION**

Cufflinks Aqua in stainless steel



---

AQUA  
CUFFLINKS

ref: C86STA0505305

---

**DESCRIPTION**

Cufflinks in stainless steel with grey resin



---

AQUA  
CUFFLINKS

ref: C86STA0505205

---

**DESCRIPTION**

Cufflinks in stainless steel with purple resin



---

AQUA  
CUFFLINKS

ref: C86STA0500305

---

**DESCRIPTION**

Cufflinks Aqua Seamaster in stainless steel and blue resin



---

AQUA  
CUFFLINKS

ref: C86STA0500205

---

**DESCRIPTION**

Cufflinks Aqua Seamaster in stainless steel and orange resin

Ω  
OMEGA



---

AQUA  
CUFFLINKS

ref: C86STA0500105

---

**DESCRIPTION**

Cufflinks Aqua Seamaster in stainless steel and red resin

Ω  
OMEGA



---

AQUA  
ACCESSORIES

ref: V02RSA0506005

---

**DESCRIPTION**

Money clip Aqua in silver and black enamel  
varnish



LADIES' COLLECTION

GENTS' COLLECTION

ACCESSORIES

AMBASSADORS

SPIRIT & HISTORY

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FINE JEWELLERY
AQUA CUFFLINKS

C92STA0507405



Description

Aqua Cufflinks Stainless Steel 316L

Material

Transparent resin on silver plated, laser engraved metal plate with applications

11 Other Aqua Cufflinks



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FINE JEWELLERY  
AQUA CUFFLINKS

C92STA0507305



Description

Aqua Cufflinks Stainless Steel 316L

Material

Transparent resin on palladium plated, laser engraved metal plate with applications

11 Other Aqua Cufflinks



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FINE JEWELLERY  
AQUA CUFFLINKS

C92STA0507105



Description

Aqua Cufflinks Stainless Steel 316L

Material

Transparent resin on violet galvanized, laser engraved metal plate with applications

11 Other Aqua Cufflinks



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Description

Aqua Cufflinks Stainless Steel 316L

Material

Transparent resin on gold plated, laser engraved metal plate with applications

11 Other Aqua Cufflinks



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FINE JEWELLERY  
AQUA CUFFLINKS

C85STA0500105



Description

Cufflinks Aqua in stainless steel

11 Other Aqua Cufflinks



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FINE JEWELLERY
AQUA CUFFLINKS

C86STA0500105



Description

Cufflinks in stainless steel and red resin

Material

Stainless Steel 316L, red resin, Seahorse motiv

Weight

15.09gr

Size

Unique

11 Other Aqua Cufflinks



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FINE JEWELLERY  
AQUA CUFFLINKS

C86STA0500205



Description

Cufflinks in stainless steel and orange resin

Material

Stainless Steel 316L, orange resin, Seahorse motif

Weight

15.09gr

11 Other Aqua Cufflinks



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FINE JEWELLERY
AQUA CUFFLINKS

C86STA0500305



Description

Cufflinks in stainless steel and blue resin

Material

Stainless Steel 316L, blue resin, Seahorse motif

Weight

15.09gr

11 Other Aqua Cufflinks



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FINE JEWELLERY  
AQUA CUFFLINKS

C86STA0505205

Description

Cufflinks in stainless steel with purple resine



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11 Other Aqua Cufflinks





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FINE JEWELLERY  
AQUA CUFFLINKS

C86STA0505305

Description

Cufflinks in stainless steel with grey resin



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11 Other Aqua Cufflinks





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FINE JEWELLERY  
AQUA ACCESSORIES

V02RSA0506005



Description

Money clip Aqua in silver and black enamel varnish

Material

silver and black enamel varnish

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FINE JEWELLERY  
GRIFFES CUFFLINKS

C91STA0107405



Description

Constellation Cufflinks Stainless Steel 316L

Material

Transparent resin on silver plated, laser engraved metal plate with applications

3 Other Griffes Cufflinks



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GRIFFES CUFFLINKS

C91STA0107305



Description

Constellation Cufflinks Stainless Steel 316L

Material

Transparent resin on palladium plated, laser engraved metal plate with applications

3 Other Griffes Cufflinks



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FINE JEWELLERY  
GRIFFES CUFFLINKS

C91STA0107105



Description

Constellation Cufflinks Stainless Steel 316L

Material

Transparent resin on violet galvanized, laser engraved metal plate with applications

3 Other Griffes Cufflinks



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Description

Constellation Cufflinks Stainless Steel 316L

Material

Transparent resin on gold plated, laser engraved metal plate with applications

3 Other Griffes Cufflinks



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FINE JEWELLERY  
GRIFFES CUFFLINKS

C91STA0107405



Description

Constellation Cufflinks Stainless Steel 316L

Material

Transparent resin on silver plated, laser engraved metal plate with applications

3 Other Griffes Cufflinks



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Description

Constellation Cufflinks Stainless Steel 316L

Material

Transparent resin on palladium plated, laser engraved metal plate with applications

3 Other Griffes Cufflinks



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FINE JEWELLERY  
GRIFFES CUFFLINKS

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Description

Constellation Cufflinks Stainless Steel 316L

Material

Transparent resin on violet galvanized, laser engraved metal plate with applications

3 Other Griffes Cufflinks



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Description

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Material

Transparent resin on gold plated, laser engraved metal plate with applications

3 Other Griffes Cufflinks



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AQUA CUFFLINKS

C92STA0507405



Description

Aqua Cufflinks Stainless Steel 316L

Material

Transparent resin on silver plated, laser engraved metal plate with applications

11 Other Aqua Cufflinks



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FINE JEWELLERY
AQUA CUFFLINKS

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Description

Aqua Cufflinks Stainless Steel 316L

Material

Transparent resin on palladium plated, laser engraved metal plate with applications

11 Other Aqua Cufflinks



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AQUA CUFFLINKS

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Description

Aqua Cufflinks Stainless Steel 316L

Material

Transparent resin on violet galvanized, laser engraved metal plate with applications

11 Other Aqua Cufflinks



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FINE JEWELLERY
AQUA CUFFLINKS

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Description

Aqua Cufflinks Stainless Steel 316L

Material

Transparent resin on gold plated, laser engraved metal plate with applications

11 Other Aqua Cufflinks



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AQUA CUFFLINKS

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Description

Cufflinks Aqua in stainless steel

11 Other Aqua Cufflinks



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FINE JEWELLERY
AQUA CUFFLINKS

C86STA0500105



Description

Cufflinks in stainless steel and red resin

Material

Stainless Steel 316L, red resin, Seahorse motiv

Weight

15.09gr

Size

Unique

11 Other Aqua Cufflinks



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FINE JEWELLERY  
AQUA CUFFLINKS

C86STA0500205



Description

Cufflinks in stainless steel and orange resin

Material

Stainless Steel 316L, orange resin, Seahorse motif

Weight

15.09gr

11 Other Aqua Cufflinks



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FINE JEWELLERY  
AQUA CUFFLINKS

C86STA0500305



Description

Cufflinks in stainless steel and blue resin

Material

Stainless Steel 316L, blue resin, Seahorse motif

Weight

15.09gr

11 Other Aqua Cufflinks



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FINE JEWELLERY  
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Description

Cufflinks in stainless steel with purple resine



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11 Other Aqua Cufflinks





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FINE JEWELLERY  
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Description

Cufflinks in stainless steel with grey resin



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11 Other Aqua Cufflinks





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FINE JEWELLERY  
AQUA ACCESSORIES

V02RSA0506005



Description

Money clip Aqua in silver and black enamel varnish

Material

silver and black enamel varnish

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FINE JEWELLERY
OMEGAMANIA RINGS

R24BGA02003XX



Description

Ring Omegamania I Love You

Material

18k red gold with diamonds

Size

Available sizes: 48 - 60

3 Other Omegamania Rings



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FINE JEWELLERY
OMEGAMANIA RINGS

R25BCA02003XX



Description

Ring Omegamania I Love You

Material

18k white gold with diamonds and white enamel

Size

Available sizes: 48 - 60

3 Other Omegamania Rings



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FINE JEWELLERY
  
OMEGAMANIA RINGS

R26BCA02003XX



Description

Ring Omegamania I Love You

Material

18k white gold with diamonds and black enamel

Size

Available sizes: 48 - 60

3 Other Omegamania Rings



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FINE JEWELLERY
  
OMEGAMANIA RINGS

R35STA02001XX



Description

Ring with polished and brushed surface

Material

Stainless Steel 316L

Size

Available Sizes: 56 - 70 Only pair sizes!

3 Other Omegamania Rings



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FINE JEWELLERY  
OMEGAMANIA NECKLACES

P80BMA0200105



Description

Necklace Omegamania Heart

Material

18k white and red gold with one diamond

Size

50cm, length adjustable

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FINE JEWELLERY  
OMEGAMANIA CUFFLINKS

C91STA0206305



Description

Cufflinks Omegamania in stainless steel and marine blue lacquer

Material

Stainless steel and marine blue lacquer

Size

Unique

8 Other Omegamania Cufflinks



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FINE JEWELLERY
OMEGAMANIA RINGS

R24BGA02003XX



Description

Ring Omegamania I Love You

Material

18k red gold with diamonds

Size

Available sizes: 48 - 60

3 Other Omegamania Rings



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FINE JEWELLERY
OMEGAMANIA RINGS

R25BCA02003XX



Description

Ring Omegamania I Love You

Material

18k white gold with diamonds and white enamel

Size

Available sizes: 48 - 60

3 Other Omegamania Rings



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FINE JEWELLERY
OMEGAMANIA RINGS

R26BCA02003XX



Description

Ring Omegamania I Love You

Material

18k white gold with diamonds and black enamel

Size

Available sizes: 48 - 60

3 Other Omegamania Rings



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FINE JEWELLERY
  
OMEGAMANIA RINGS

R35STA02001XX



Description

Ring with polished and brushed surface

Material

Stainless Steel 316L

Size

Available Sizes: 56 - 70 Only pair sizes!

3 Other Omegamania Rings



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FINE JEWELLERY  
OMEGAMANIA NECKLACES

P80BMA0200105



Description

Necklace Omegamania Heart

Material

18k white and red gold with one diamond

Size

50cm, length adjustable

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FINE JEWELLERY  
OMEGAMANIA CUFFLINKS

C91STA0206305



Description

Cufflinks Omegamania in stainless steel and marine blue lacquer

Material

Stainless steel and marine blue lacquer

Size

Unique

8 Other Omegamania Cufflinks



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OMEGAMANIA CUFFLINKS

C91STA0206105



Description

Cufflinks Omegamania in stainless steel and black lacquer

Material

Stainless steel and black lacquer

Size

Unique

8 Other Omegamania Cufflinks



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FINE JEWELLERY  
OMEGAMANIA CUFFLINKS

C83STA0200105

Description

Cufflinks Omegamania in stainless steel

Material

Stainless steel



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8 Other Omegamania Cufflinks





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FINE JEWELLERY
OMEGAMANIA CUFFLINKS

C83STA0200205

Description

Cufflinks Omegamania, symbole in stainless steel with diamonds

Material

Stainless steel with diamonds



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8 Other Omegamania Cufflinks

