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

Proceeding	91200183
Party	Plaintiff The Worlds Pageants, LLC and Camila Productions Ltd.
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

THE WORLDS PAGEANTS LLC and)	
CAMILA PRODUCTIONS LTD)	
Opposer,)	Opposition No. 91,200,183
)	
)	For: "MISS G-STRING
)	INTERNATIONAL"
)	
v.)	Serial No. 77/753,000
)	Published December 7, 2010
)	
MISS G-STRING INTERNATIONAL, LLC)	
Applicant.)	

COMMISSIONER OF TRADEMARKS
2900 Crystal Drive
Arlington, VA 22202-3513

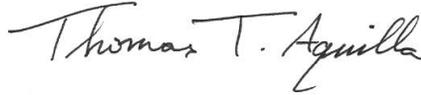
OPPOSER'S MOTION FOR SUMMARY JUDGMENT

Pursuant to the provisions of Rule 56 of the Federal Rules of Civil Procedure, 37 C.F.R. Section 2.116 and Section 528 of the Trademark Trial and Appeal Board Manual of Procedure, Opposer The Worlds Pageants, LLC ("TWP" or "Opposer"), by and through its attorney, Thomas T. Aquilla, hereby respectfully moves the Trademark Trial and Appeal Board to grant its Motion for Summary Judgment against Applicant Miss G-String International, LLC ("MGI" or "Applicant"), because Applicant's mark MISS G-STRING INTRENATIONAL" is likely to cause confusion with and dilute Opposer's famous MISS NUDE INTERNATIONAL Mark.

More particularly, through Applicant's failure to respond to Opposer's First Set of Requests for Admissions, the requests are conclusively established. TBMP § 407.04. As a result, the Opposition should be sustained.

The facts and grounds for Opposer's Motion for Summary Judgment are set forth more fully in Opposer's Brief in Support of Summary Judgment submitted herewith.

Respectfully Submitted:

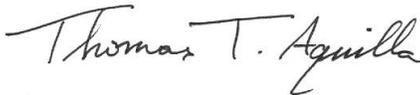


Dated: **December 18, 2013**

By: /Thomas T. Aquilla/
Registration No. 43,473
(603) 253-9474
Aquila Patents & Marks PLLC
221 Coe Hill Road
Center Harbor, NH 03226

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been mailed via the U.S. Postal Service via First Class Mail, in an envelope addressed to Counsel for Petitioner, Luke Charles Lirot, 2240 Belleair Road, Suite 190 Clearwater FL 33764, on **December 18, 2013**.



Thomas T. Aquilla, Esq.

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BRIEF IN SUPPORT OF OPPOSER'S MOTION FOR SUMMARY JUDGMENT

Opposer The Worlds Pageants LLC and Camila Productions Ltd ("TWP" or "Opposer"),
by and through its attorney, Thomas T. Aquilla, hereby submits this Brief in Support of its
Motion for Summary Judgment, submitted herewith.

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I. RELEVANT FACTS AND PROCEDURAL STATUS

A. APPLICANT FAILED TO RESPOND TO DISCOVERY

On September 19-24, 2011, Opposer served Applicant written discovery, including Opposer's First Set of Interrogatories (served September 19, 2011, attached hereto as Exhibit F), Opposer's First Set of Requests for Admissions (served September 21, 2011, attached hereto as Exhibit G), and Opposer's First Set of Requests for Production of Documents and Things (served September 24, 2011, attached hereto as Exhibit H).

Applicant's response deadlines thereto were October 24, 2011, October 26, 2011 and October 29, 2011 respectively. Subsequently, Applicant's October 24, 26 and 29 deadlines for response passed, without any response from Applicant. See Declaration of Thomas T. Aquilla ("TWP 2d Dec."), attached hereto as Exhibit I.

On September 28, 2011, Opposer filed a Motion to Strike Matter from Applicant's Answer. On October 13, 2011, Applicant filed its Response to Opposer's Motion and subsequently, on October 28, 2011, Applicant filed a Motion to Strike Opposer's *Nun Pro Tunc* Assignments. The Board ruled on these motions and issued its Order on June 26, 2012. Subsequently, after multiple attempts to amend its Answer and enter a counterclaim, the Board recently dismissed Applicant's counterclaim with prejudice and resumed the opposition proceedings in its order of November 27, 2013. Discovery currently is ongoing and remains open until March 15, 2014 in accordance with the dates as reset in the Order.

B. APPLICANT PROVIDED WITH AMPLE OPPORTUNITY TO RESPOND

Throughout this proceeding, Opposer has been cooperative and patient with Applicant and has given Applicant the opportunity to respond to Opposer's discovery requests. Since the opposition was initiated, Opposer, through its attorney, has made various contacts with

Applicant's attorneys to discuss the discovery in the case. Applicant, through its attorneys, has acknowledged receipt of Opposer's discovery requests, but has offered no explanation for Applicant's failure to timely respond. Applicant has made no request to extend the time to respond. Instead, Applicant has wholly failed to respond to Opposer's requests for written discovery.

On June 6, 2011, Opposer filed a Notice of Opposition challenging Applicant Miss G-String International, LLC's right to register the mark MISS G-STRING INTERNATIONAL. On or around July 19, 2011, Applicant Miss G-String International, LLC, represented by its attorney, Luke Lirot, responded in this opposition by filing an Answer to the Notice of Opposition.

On September 19-24, 2011, Opposer served Applicant the written discovery discussed above. On September 21, 2011, September 29, October 6 and October 21, 2011, Opposer attempted to contact Applicant's attorneys by telephone, however, Applicant's attorneys were never available and never returned any of the telephone calls from Opposer's attorney. Subsequently, Applicant's October 24, 26 and 29 deadlines for response to Opposer's requests for written discovery passed, without any response from Applicant. In sum, Opposer has provided Applicant with ample time to respond to Opposer's discovery requests, yet Applicant has completely failed to respond.

II. APPLICABLE LAW

A. ADMISSIONS DEEMED ADMITTED

"Any matter admitted (either expressly, or for failure to timely respond) under Fed. R. Civ. P. 36(a) is conclusively established unless the Board, on motion, permits withdrawal or amendment of the admission or the Board permits a reopening of the time for responding to the admission requests." TBMP § 407.04; Fed. R. Civ. P. 36(b); Fed. R. Civ. P. 6(b)(1)(B); see also

Texas Department of Transportation v. Tucker, 95 USPQ2d 1241 (TTAB 2010) (admission conclusively establishes matter that is the subject of request for admission, subsequent argument to the contrary in response brief insufficient to raise genuine issue of material fact).

"If a party on which requests for admission have been served fails to file a timely response thereto, the requests will stand admitted unless the party is able to show that its failure to timely respond was the result of excusable neglect; or unless a motion to withdraw or amend the admissions is filed pursuant to Fed. R. Civ. P. 36(b), and granted by the Board." TBMP § 411.03; see also *Giersch v. Scripps Networks Inc.*, 85 USPQ2d 1306 (TTAB 2007); *Hobie Designs, Inc. v. Fred Hayman Beverly Hills, Inc.*, 14 USPQ2d 2064 (TTAB 1990). Applicant has not made such a motion to the Board, nor a showing of excusable neglect.

B. SUMMARY JUDGMENT STANDARDS

Summary judgment is proper when "the pleadings, discovery and disclosure materials on file, and any affidavits, show that there is no genuine issue as to any material fact and that the movant is entitled to judgment as a matter of law." *Celotex Corp. v. Catrett*, 477 U.S. 317, 322 (1986); Fed. R. Civ. P. 56(c); TBMP § 528.01. When moving for summary judgment, the burden does not fall on the movant to produce evidence that no genuine issue of material fact exists. *Sweats Fashions, Inc. v. Pannill Knitting Co., Inc.*, 833 F.2d 1560, 1563 (Fed. Cir. 1987). Rather, the moving party's burden is only to "**point out** ... that there is an absence of evidence supporting the non-moving party's case." *Id.* (emphasis added) (citing *Celotex*); see also *Kellog Co. v. Pack'Em Enters. Inc.*, 951 F.2d 330, 333 (Fed. Cir. 1991). The burden then shifts to the non-moving party who "must set forth specific facts showing that there is a genuine issue for trial." *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 250 (1986) (quoting Fed. R. Civ. P. 56(e)).

Once that burden shifts, the non-moving party cannot simply rest on its conclusory pleadings or reassert its previous allegations. *Pure Gold, Inc. v. Syntex, Inc.*, 739 F.2d 624, 626-7 (Fed. Cir. 1984). Instead, Rule 56(e) "requires the non-moving party to go beyond the pleadings" to present "concrete evidence" supporting its position. *Celotex*, 477 U.S. at 324. The motion for summary judgment will be granted "if the pleadings, depositions, answers to interrogatories, and admissions on file, together with the affidavits, if any, show there is no genuine issue as to any material fact and that the moving party is entitled to judgment as a matter of law." Fed. R. Civ. P. 56(c).

Likelihood of confusion in a trademark infringement action is a question of law based on underlying factual determinations. *Packard Press, Inc. v. Hewlett-Packard Co.*, 227 F.3d 1352, 1356 (Fed. Cir. 2000); *Sweats*, 833 F.2d at 1565. Whether a likelihood of confusion exists in a particular case is an appropriate issue for summary judgment. *Danskin, Inc. v. Dan River, Inc.*, 498 F.2d 1386, 1388 (C.C.P.A. 1974). Trademark dilution also is a question of law that can be decided appropriately through summary judgment. See *Lozano Enterprises v. La Opinion Publishing Co.*, 44 USPQ2d 1764 (C.D. Cal. 1997).

III. ENTITLEMENT TO SUMMARY JUDGMENT

Through Applicant's failure to respond to Opposer's First Set of Requests for Admissions, Applicant has admitted Opposer's case-in-chief, namely, that Applicant's mark MISS G-STRING INTERNATIONAL is likely to cause confusion with and dilution of Opposer's famous and distinctive MISS NUDE INTERNATIONAL Mark:

1. Applicant has admitted that "MISS G-STRING INTERNATIONAL" is similar to MISS NUDE INTERNATIONAL in sight, sound, and meaning. [Opposer's Req. for Adm. No. 31.]

2. Applicant has admitted that "MISS G-STRING INTERNATIONAL" is likely to cause confusion with The Worlds Pageants, LLC's MISS NUDE INTERNATIONAL Mark. [Opposer's Req. for Adm. No. 32.]
3. Applicant has admitted that in choosing the mark MISS G-STRING INTERNATIONAL, Miss G-String International, LLC intended to trade off the goodwill established by The Worlds Pageants, LLC's MISS NUDE INTERNATIONAL Mark. [Opposer's Req. for Adm. No. 33.]
4. Applicant has admitted that the MISS NUDE INTERNATIONAL Mark is famous and distinctive. [Opposer's Req. for Adm. Nos. 35 and 36.]
5. Applicant has admitted that Miss G-String International, LLC's services under "MISS G-STRING INTERNATIONAL" are identical to the services offered by The Worlds Pageants, LLC under the MISS NUDE INTERNATIONAL Mark. [Opposer's Req. for Adm. No. 16.]
6. Applicant has admitted that Miss G-String International, LLC's services under "MISS G-STRING INTERNATIONAL" are substantially similar to the services offered by The Worlds Pageants, LLC under the MISS NUDE INTERNATIONAL Mark. [Opposer's Req. for Adm. No. 17.]
7. Applicant has admitted that Miss G-String International, LLC's customers, clients, or consumers are identical or substantially similar to The Worlds Pageants, LLC's customers, clients, or consumers. [Opposer's Req. for Adm. Nos. 18-28.]
8. Applicant has admitted that Miss G-String International, LLC never requested permission from The Worlds Pageants, LLC to use "MISS G-STRING INTERNATIONAL" and that Miss G-String International, LLC's use of and

application for "MISS G-STRING INTERNATIONAL" has been without the consent of The Worlds Pageants, LLC. [Opposer's Req. for Adm. Nos. 29 and 30.]

9. Applicant has admitted that Miss G-String International, LLC was aware of The Worlds Pageants, LLC's MISS NUDE INTERNATIONAL Mark prior to its adoption and use of "MISS G-STRING INTERNATIONAL". [Opposer's Req. for Adm. No. 9.]

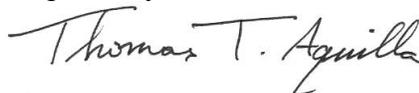
10. Applicant has admitted that Miss G-String International, LLC did not use "MISS G-STRING INTERNATIONAL" prior to The Worlds Pageants, LLC's use of the MISS NUDE INTERNATIONAL Mark. [Opposer's Req. for Adm. Nos. 6 and 7.]

As a result of the above admissions, Opposer's case has been established. Applicant has admitted the similar or identical nature of the marks, the services of the parties, and the relevant consumers. *E.I. DuPont DeNemours & Co.*, 476 F.2d 1357, 177 USPQ 563 (C.C.P.A. 1073.). Applicant has admitted that it is a competitor of Opposer, that it intended to trade off the goodwill associated with Opposer's mark, and that Opposer has priority of use. *Id.* at 1361. Applicant has admitted that Opposer's mark is famous and distinctive. *The Toro Company v. ToroHead, Inc.*, 61 USPQ2d 1164 (T.T.A.B. 2001).

IV. CONCLUSION

For the foregoing reasons, Opposer respectfully requests that the Trademark Trial and Appeal Board grant its Motion for Summary Judgment, that the Opposition be sustained and that Applicant's application be refused registration.

Respectfully Submitted:



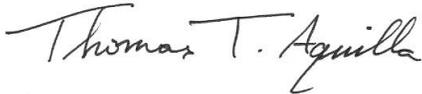
Dated: **December 18, 2013**

By: /Thomas T. Aquilla/

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been mailed via the U.S. Postal Service via First Class Mail, in an envelope addressed to Counsel for Petitioner, Luke Charles Lirot, 2240 Belleair Road, Suite 190 Clearwater FL 33764, on **December 18, 2013**.



Thomas T. Aquilla, Esq.

EXHIBIT F

Attorney Docket No.: TWP-701L

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**OPPOSER THE WORLD'S PAGEANTS, LLC'S FIRST SET OF INTERROGATORIES
TO APPLICANT MISS G-STRING INTERNATIONAL, LLC**

Pursuant to the provisions of 37 CFR §2.120 and Rule 33 of the Federal Rules of Civil Procedure, Opposer, THE WORLD'S PAGEANTS, LLC, hereby serves the following interrogatories upon Applicant, MISS G-STRING INTERNATIONAL, LLC, to be answered under oath by Applicant within thirty (30) days of service hereof.

INSTRUCTIONS AND DEFINITION OF TERMS

- A. As used herein, the term "Opposer" refers to THE WORLD'S PAGEANTS, LLC, and includes all other partnerships, corporations or other business entities (whether or not separate legal entities) subsidiary to, parent to, or affiliated with Opposer, including all of its or their partners, principals, officers, directors, trustees, employees, staff members, agents and representatives, including counsel for Opposer.
- B. The terms "Opposer's Marks" refers to any designation and/or trademark used or intended to be used by Opposer to identify Opposer or the goods or services offered or promoted by Opposer in connection with that term, and collectively refers to the MISS NUDE

INTERNATIONAL marks owned by Opposer, including without limitation, United States Trademark Registration No. 2,037,202 and cited by Opposer in its Notice of Opposition.

- C. The term "Applicant" refers to MISS G-STRING INTERNATIONAL, LLC and/or its licensee(s), and includes all other partnerships, corporations or other business entities (whether or not separate legal entities) subsidiary to, parent to, or affiliated with Applicant, including all of its or their partners, principals, officers, directors, trustees, employees, staff members, agents and representatives, including counsel for Applicant.
- D. The terms "Applicant's Mark" or "MISS G-STRING INTERNATIONAL" refers to the designation and/or trademark sought to be registered by means of Application No. 77/753,000.
- E. Wherever in the following interrogatories Applicant is asked to identify documents, it is requested that the documents be identified by stating:
 - a. General type of document, *i.e.*, letter, memorandum, report, miscellaneous, notes, *etc.*;
 - b. Date;
 - c. Author;
 - d. Organization, if any, with which author was connected;
 - e. Addressee or recipient;
 - f. Other distributees;
 - g. Organization, if any, with which addressee or recipient, or distributees were connected;
 - h. General nature of the subject matter to extent that Applicant can do so without divulging matter considered by it to be privileged;
 - i. Present location of such document and each copy thereof known to Applicant, including the title, index number and location, if any, of the file in which the document is kept or the file from which such document was removed, if removed for the purposes of this case, and the identity of all persons responsible for the filing or other disposition of the document.
- F. Wherever in the following interrogatories Applicant is asked to identify persons, it is requested that the persons be identified by stating:
 - a. Their full name, home and business addresses, if known;

- b. Their employment, job title or description; and
 - c. If employed by Applicant, their dates and regular places of employment and general duties.
- G. Wherever in the following interrogatories Applicant is asked to identify companies or the response to an interrogatory would require the identification of a company, it is requested that the company be identified by stating:
 - a. Its full corporate name;
 - b. A brief description of the general nature of its business;
 - c. Its state of incorporation;
 - d. The address and principal place of business; and
 - e. The identity of the officers or other person having knowledge of the matter with respect to which the company has been identified.
- H. Wherever in the following interrogatories Applicant is asked to identify goods, products or services, or the marking used in combination with the goods or services, it is requested that the same be identified by stating the catalog, stock, model or the like number or designation, the trademark, name, type, grade, design element, or stylized appearance of the mark, and any other designation customarily used by the party concerned to designate such goods, products or services, or the like, and to distinguish it from others made by the same or a different producer.
- I. Should Applicant deem to be privileged any document concerning information which is requested by any of the following interrogatories, Applicant shall list such documents and supply information as requested in Paragraph E above concerning such documents, and additionally shall indicate that they claim privilege therefor, briefly state the nature of the document, the sender, the author, the recipient of each copy, the date, the name of each person to whom the original or any copy was circulated, the names appearing on any circulation list of Applicant associated with such document, a summary statement of the subject matter(s) of such document in sufficient detail to permit the Trademark Trial and Appeal Board to conduct an analysis to reach a determination of any claim of privilege or exclusion and separate indication of the basis for assertion of privilege or the like for each such document.
- J. Whenever the terms "documents" or "all documents" are used herein, these terms are meant to include all documents available to Applicant and further to include, without

limitation, any written, recorded, graphic, or printed matter, in whatever form, whether printed and/or produced by hand or any other process, specifically including (1) all originals, copies or drafts, and (2) originals, copies or drafts on which appear any notes or writings placed thereon after the document was first printed, typed, recorded, or made into graphic matter, however produced or reproduced, in the actual or constructive possession of Applicant, including, without limitation, any letters, telegrams, memoranda, writings, circulars, monographs, bulletins, manuals, speeches, audio and video tapes, drawings, blueprints, recordings, computer disks or tapes, computer electronic or optical memory devices in readable form, computer printouts, computer electronic messages, notes, correspondence, communications of any nature, summaries of records of conversations or conferences, information which can be retrieved by any process, test and/or analysis, reports and data sheets, specifications, sketches, minutes or reports and/or summaries or interviews, reports and/or summaries of investigations, opinions or reports of consultants, agreements and contracts, brochures, pamphlets, advertisements, letters to the trade, and including any tangible things within the scope of Rule 34(a)(1), Federal Rules of Civil Procedure. Any document bearing on any sheet or side thereof any marks not a part of the original text or any reproduction thereof is to be considered a separate document for purposes of responding to the following specific document requests.

- K. Each of the separate interrogatories herein is deemed to seek separate answers and responses as of the date hereof and these interrogatories shall be deemed to be continuing and any additional information relating in any way to these interrogatories and to events occurring or documents existing prior to the filing of the Opposition herein which Applicant acquires or which becomes known to Applicant up to and including the close of the rebuttal testimony period shall be furnished to Applicant within a reasonable time after such information is acquired or becomes known.

INTERROGATORIES

Interrogatory No. 1:

Describe in detail the nature of Applicant's business or businesses, including the date on which Applicant first engaged in each such business.

Interrogatory No. 2:

Identify all past and present owners of the MISS G-STRING INTERNATIONAL Mark and identify the time period each such owner owned the MISS G-STRING INTERNATIONAL Mark and the manner in which each owner used the mark.

Interrogatory No. 3:

Identify all officers and directors of Applicant from 2009 to the present.

Interrogatory No. 4:

Identify each person employed by Applicant, or each outside agency or agent retained by Applicant, who has been or now is responsible for the following activity with respect to any of the goods or services intended to be offered or rendered or actually offered or rendered under Applicant's Mark:

- a. marketing;
- b. advertising and promotion; and
- c. bookkeeping and accounting.

Interrogatory No. 5:

With respect to Applicant's Mark, identify the person or persons most knowledgeable about Applicant's sales, advertising and sales promotion, adoption and use, licensing, and assignment or other transfer of rights.

Interrogatory No. 6:

Identify all persons likely to have knowledge of discoverable information related to the facts alleged in Opposer's Notice of Opposition or Answer of Applicant to Opposition in this proceeding including, but not limited to, knowledge relating to Applicant's selection and adoption of the MISS G-STRING INTERNATIONAL Marks, and the sales, marketing, advertising, and promotion of goods and/or services offered using that mark. Include in this response a description of the subject matter within each identified individual's knowledge.

Interrogatory No. 7:

Describe the meaning and derivation of the phrase "MISS G-STRING INTERNATIONAL" as used in connection with the goods of Applicant upon or in connection with which Applicant has used that phrase.

Interrogatory No. 8:

Describe in reasonable detail all the facts and circumstances surrounding Applicant's decision to select and adopt the MISS G-STRING INTERNATIONAL Mark, including, but not limited to, the identity of all persons involved in the selection process; the time, place, and attendees of any meetings in which the consideration, acquisition, selection, approval, or adoption of the MISS G-STRING INTERNATIONAL Mark was discussed, as well as a detailed

account of such meetings; all steps taken to clear this mark; all research conducted; alternative names considered; and an explanation of how and why those marks were chosen.

Interrogatory No. 9:

Identify all inquiries, investigations, surveys, evaluations and or trademark search reports, studies (including, for example, consumer surveys or market research), investigations, or analyses performed by or for Applicant relating, in whole or in part, to the MISS G-STRING INTERNATIONAL Mark or any variations thereof, or the services promoted using those marks, if any, whether or not prepared in connection with this dispute, including the date conducted, the name, address and title of each person who conducted it, the purpose for which it was conducted, the findings or conclusions made, and identify all documents which record, refer to, or relate to such inquiry, investigation, survey, evaluation or study.

Interrogatory No. 10:

Identify each statement or opinion obtained by or for Applicant regarding any issue in this opposition proceeding including, but not limited to, whether the statement was oral or in writing, and identify all documents that record, refer to, or relate to such statement or opinion.

Interrogatory No. 11:

Describe in reasonable detail and identify all documents relating to your initial awareness (including the date and circumstances under which you first became aware and identify the person who first became aware) of: (i) Opposer's use of its Mark MISS NUDE INTERNATIONAL; (ii) Opposer's registration for the Mark MISS NUDE INTERNATIONAL.

Interrogatory No. 12:

For purposes of establishing priority of use, for each of the goods/services identified in Applicant's Application No. 77/753,000, identify the earliest date upon which Applicant intends to rely in this proceeding with respect to its use of Applicant's Mark and/or any mark that includes the term "MISS G-STRING INTERNATIONAL", and produce all documents supporting the date on which the mark was first used, if use has commenced.

Interrogatory No. 13:

State by date and location each contest in connection with which Applicant used the MISS G-STRING INTERNATIONAL Mark and include the number of people who attended each contest, the type and amount of media coverage each contest received, and who was in charge of organizing the event.

Interrogatory No. 14:

Identify any period of nonuse of the MISS G-STRING INTERNATIONAL Marks by date and amount of time each mark was not being used by Applicant.

Interrogatory No. 15:

Describe all changes made to the MISS G-STRING INTERNATIONAL Marks and to how Applicant has used those marks since their first uses on or in connection with Applicant's goods or services, including when those changes occurred and the reasons for the changes.

Interrogatory No. 16:

Identify all state and federal registrations, applications for registration, and uses by Applicant of any mark which incorporates the term "MISS G-STRING INTERNATIONAL", and for each such registration, application, and use, identify all documents relating thereto.

Interrogatory No. 17:

Identify all third parties that Applicant is aware of that have sold or referred to any products or services using a mark which incorporates the terms "MISS" and "INTERNATIONAL." State when Applicant first became aware of each such third party and Applicant's reaction, if any.

Interrogatory No. 18:

Identify all third-party state and federal registrations, applications for registration, and uses known to Applicant of any mark which incorporates the terms "MISS" and "INTERNATIONAL", and for each such registration, application, and use, identify all documents relating thereto.

Interrogatory No. 19:

Has Applicant ever been a party to any dispute, civil action, and/or administrative proceeding (other than the present proceeding) involving the MISS G-STRING INTERNATIONAL Marks or any variations thereof? If so, state all circumstances surrounding same including, without limitation, the name of the parties and identification of the proceeding, Applicant's status therein, the mark or marks involved, the type of proceeding involved, the name of the court or agency in which it was filed, the date of the filing and the file number, the ultimate disposition of the proceedings, and identify each document relating to such proceeding.

Interrogatory No. 20:

Identify all documents relating to and set forth with specificity all facts regarding any instance where Applicant has notified anyone that any trademark or service mark used by that person or entity infringed Applicant's Mark and/or any mark of Applicant that includes the term "MISS G-STRING INTERNATIONAL", and for each such instance provide a detailed description of any action taken thereafter.

Interrogatory No. 21:

Identify all documents and set forth with specificity all facts with respect to any instance where a person or entity has been confused, mistaken, and/or deceived as to whether any goods or services advertised or sold under Applicant's Mark are those of Opposer, or are connected or associated with Opposer, and for each such incident provide the date of such incident, the identity of the person or entity, and a detailed description of the circumstances of such confusion, mistake and/or deception.

Interrogatory No. 22:

Identify all documents and set forth with specificity the substance of each communication, oral or written, received by Applicant, which suggests, implies or infers that any of the products of Applicant sold under Applicant's Mark, or any mark that includes the term "MISS G-STRING INTERNATIONAL", is a product of Opposer or is affiliated, connected and/or associated with Opposer, or which inquires as to whether there is or may be an affiliation, connection and/or association between Applicant and Opposer, and identify any response(s) by Applicant to each such communication.

Interrogatory No. 23:

Identify all manufacturers or intended manufacturers of goods, and all promoters or intended promoters of services, bearing Applicant's Mark.

Interrogatory No. 24:

Describe in detail all past and existing relations, including contracts, agreements, licenses, assignments, or other relations, between Applicant and any third party, including predecessor companies, related, or affiliated companies, relating in any manner to Applicant's Mark, and Identify all documents relating to or constituting any agreement, assignment, consent, authorization, permission, or license made between Applicant and any other entity, or made on Applicant's behalf, to use any of the MISS G-STRING INTERNATIONAL Marks.

Interrogatory No. 25:

Describe and explain in detail the nature of the relationship between MISS G-STRING INTERNATIONAL, LLC, Playboy Enterprises, Playboy TV and/or Playboy.com.

Interrogatory No. 26:

Has Applicant ever licensed or permitted or had negotiations to license or permit, or otherwise granted rights to third parties to use Applicant's Mark or any mark including the term "MISS G-STRING INTERNATIONAL" as a component? If so, identify the party or parties who have received or sought such license or permission or other right, state the nature and extent of any such license or permitted use or right, given or negotiated, and identify and describe all documents comprising or containing any such license, permission, or other right, or any agreement in respect to such mark.

Interrogatory No. 27:

Identify all goods and services planned to be or that currently are advertised, marketed, distributed, sold, or offered for sale by Applicant using the MISS G-STRING INTERNATIONAL Mark and the date on which each such good or service was or will be first offered.

Interrogatory No. 28:

For each good and service described in the answers to Interrogatory No. 27, describe in reasonable detail the channels of trade through which each such good or service has been or will be sold or distributed by Applicant, including the class(es) of customer(s) for each such good or service, the number of units and dollar amount of the annual sales of such goods or services, and identify documents sufficient to support your response to this interrogatory.

Interrogatory No. 29:

Describe all activities and efforts of Applicant to advertise and/or promote its goods and services using the MISS G-STRING INTERNATIONAL Marks including, but not limited to, the dollar amount of annual advertising expenditure on such goods or services, and the individual media through which such advertising took place for the MISS G-STRING INTERNATIONAL Marks.

Interrogatory No. 30:

State separately by year and by mark, Applicant's total sales in dollars of goods and services offered using the MISS G-STRING INTERNATIONAL Marks.

Interrogatory No. 31:

State the approximate percentage of sales of products bearing Applicant's Mark via the Internet versus other sales channels, and identify documents sufficient to support your response to this Interrogatory.

Interrogatory No. 32:

Identify each different sign, display, point-of-sale display, label, hangtag, wrapper, container, package, advertisement, brochure, promotional material, and the like, known to Applicant which contains or bears Applicant's Mark or any variation thereof and which is intended to be used or has been used or disseminated at any time by Applicant.

Interrogatory No. 33:

State in detail the channels of trade in which Applicant's Mark is used and/or in which goods bearing Applicant's Mark are sold, including the geographic area by state, territory or possession in which Applicant's Mark is used and/or sold, the manner in which the goods or services reach the ultimate consumer, the geographical reach of each such channel, and the approximate percentage of total sales of goods and/or services through each such channel, and identify documents sufficient to support your response to this interrogatory.

Interrogatory No. 34:

Identify with specificity the marketing methods used in the advertising and/or sale of goods and/or services by or for Applicant under Applicant's Mark, including, without limitation, the names of television stations, radio stations, Internet web sites, newspapers, magazines, trade journals or periodicals, and/or retail establishments in which Applicant has advertised and intends to advertise its goods and/or services under Applicant's Mark, and identify documents sufficient to support your response to this interrogatory.

Interrogatory No. 35:

Identify the ordinary purchaser of the goods or services sold and intended to be sold under Applicant's Mark including, without limitation, the level of care exercised by such an ordinary purchaser in purchasing the goods or services sold under Applicant's Mark.

Interrogatory No. 36:

Identify all experts employed by Applicant for purposes of this action, and for each such person, identify his or her field of specialization; whether Applicant intends to call him or her as an expert witness; the qualifications of the witness, including a list of all publications authored

by the witness within the preceding ten years; the compensation to be paid to the witness for services performed related to this dispute; and a listing of all other cases in which the witness has testified as an expert at trial or by deposition within the preceding four years; the subject matter on which he or she is expected to testify; a complete statement of all opinions to be expressed and the basis and reasons therefor; the data or other information considered by the witness in forming the opinions; any exhibits to be used as a summary of or support for the opinions; and identify all documents that relate in any way to the subject matter, facts, and/or circumstances as to which the expert is expected to testify.

Interrogatory No. 37:

Identify by name, title, employer, and the testimony subject matter each non-expert witness that Applicant may call as a fact witness to testify, the subject matter on which the witness is expected to testify, each fact and/or opinion to which the witness is expected to testify, the bases for each opinion and identify all documents that relate in any way to the subject matter, facts, and/or circumstances as to which the witness is expected to testify.

Interrogatory No. 38:

Explain in reasonable detail the basis for Applicant's denial of paragraph 1 of the Notice of Opposition in this proceeding.

Interrogatory No. 39:

Explain in reasonable detail the basis for Applicant's denial of paragraph 2 of the Notice of Opposition in this proceeding.

Interrogatory No. 40:

Explain in reasonable detail the basis for Applicant's denial of paragraph 3 of the Notice of Opposition in this proceeding.

Interrogatory No. 41:

Explain in reasonable detail the basis for Applicant's denial of paragraph 5 of the Notice of Opposition in this proceeding.

Interrogatory No. 42:

Explain in reasonable detail the basis for Applicant's denial of paragraph 6 of the Notice of Opposition in this proceeding.

Interrogatory No. 43:

Explain in reasonable detail the basis for Applicant's denial of paragraph 7 of the Notice of Opposition in this proceeding.

Interrogatory No. 44:

Explain in reasonable detail the basis for Applicant's denial of paragraph 8 of the Notice of Opposition in this proceeding.

Interrogatory No. 45:

Explain in reasonable detail the basis for the first-listed Affirmative Defense in Applicant's Answer to Opposer's Notice of Opposition.

Interrogatory No. 46:

Explain in reasonable detail the basis for the second-listed Affirmative Defense in Applicant's Answer to Opposer's Notice of Opposition.

Interrogatory No. 47:

Explain in reasonable detail the basis for the third-listed Affirmative Defense in Applicant's Answer to Opposer's Notice of Opposition.

Interrogatory No. 48:

Explain in reasonable detail the basis for the fourth-listed Affirmative Defense in Applicant's Answer to Opposer's Notice of Opposition.

Interrogatory No. 49:

Explain in reasonable detail the basis for the fifth-listed Affirmative Defense in Applicant's Answer to Opposer's Notice of Opposition.

Interrogatory No. 50:

Explain in reasonable detail the basis for the sixth-listed Affirmative Defense in Applicant's Answer to Opposer's Notice of Opposition.

Interrogatory No. 51:

Explain in reasonable detail the basis for the sixth-listed Affirmative Defense in Applicant's Answer to Opposer's Notice of Opposition.

Interrogatory No. 52:

Explain in reasonable detail the basis for the sixth-listed Affirmative Defense in Applicant's Answer to Opposer's Notice of Opposition.

Interrogatory No. 53:

Explain in reasonable detail the basis for the assertion in paragraph 13 of the sixth-listed Affirmative Defense in Applicant's Answer to Opposer's Notice of Opposition.

Interrogatory No. 54:

Explain in reasonable detail the basis for the assertion in paragraph 14 of the sixth-listed Affirmative Defense in Applicant's Answer to Opposer's Notice of Opposition.

Interrogatory No. 55:

Explain in reasonable detail the basis for the assertion in paragraph 15 of the sixth-listed Affirmative Defense in Applicant's Answer to Opposer's Notice of Opposition.

Interrogatory No. 56:

Explain in reasonable detail the basis for the assertion in paragraph 16 of the sixth-listed Affirmative Defense in Applicant's Answer to Opposer's Notice of Opposition.

Interrogatory No. 57:

Explain in reasonable detail the basis for the assertion in paragraph 17 of the sixth-listed Affirmative Defense in Applicant's Answer to Opposer's Notice of Opposition.

Interrogatory No. 58:

Explain in reasonable detail the basis for the assertion in paragraph 18 of the sixth-listed Affirmative Defense in Applicant's Answer to Opposer's Notice of Opposition.

Interrogatory No. 59:

Explain in reasonable detail the basis for the assertion in paragraph 19 of the sixth-listed Affirmative Defense in Applicant's Answer to Opposer's Notice of Opposition.

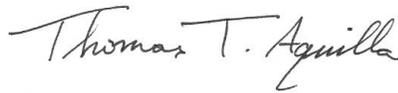
Interrogatory No. 60:

Explain in reasonable detail the basis for the assertion in paragraph 30 of the sixth-listed Affirmative Defense in Applicant's Answer to Opposer's Notice of Opposition.

Interrogatory No. 61:

Identify each person who participated in any way in the preparation of the answers or responses to these interrogatories, or supplied information used in answering any of the above interrogatories; beside the name of each such person, state the number of the interrogatory answer(s) with respect to which that person participated or supplied information.

Respectfully Submitted:



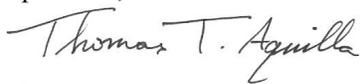
Dated: September 19, 2011

By: /Thomas T. Aquilla/

ATTORNEY FOR OPPOSER
Registration No. 43,473
(603) 253-9474
Aquila Patents & Marks PLLC
221 Coe Hill Road
Center Harbor, NH 03226

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been mailed via the U.S. Postal Service via First Class Mail, in an envelope addressed to Counsel for Applicant, Luke Lirot, Esq., Miss G-String International, 1420 Sunningdale Lane, Ormond Beach, FL, 32174, on this 19th day of September, 2011.



Thomas T. Aquilla, Esq.

EXHIBIT G

Attorney Docket No.: TWP-701L

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

THE WORLD'S PAGEANTS, LLC,)	
Opposer,)	Opposition No. 91,200,183
)	
)	For: "MISS G-STRING
)	INTERNATIONAL"
)	
v.)	Serial No. 77/753,000
)	Published December 7, 2010
MISS G-STRING INTERNATIONAL, LLC,)	
Applicant.)	
)	

COMMISSIONER OF TRADEMARKS
2900 Crystal Drive
Arlington, VA 22202-3513

**OPPOSER THE WORLD'S PAGEANTS, LLC'S FIRST SET OF REQUESTS FOR
ADMISSIONS TO APPLICANT MISS G-STRING INTERNATIONAL, LLC**

INSTRUCTIONS AND DEFINITION OF TERMS

The Definitions and Instructions included in Opposer's First Set of Interrogatories to Applicant, served September 19, 2011, are hereby incorporated by reference.

REQUESTS

Pursuant to the provisions of 37 CFR §2.120 and Rule 36 of the Federal Rules of Civil Procedure, Opposer, THE WORLD'S PAGEANTS, LLC, hereby serves the following requests for admissions upon Applicant, MISS G-STRING INTERNATIONAL, LLC, and hereby requests that Applicant, MISS G-STRING INTERNATIONAL, LLC, for purposes of this proceeding, admit under oath or declaration, the truth of the following:

Request 1:

Admit that The World's Pageants, LLC conducts, promotes, and produces beauty pageant competitions under the mark MISS NUDE INTERNATIONAL.

Request 2:

Admit that The World's Pageants, LLC's predecessor-in-interest, R&D Promotions, Inc., is the owner of record of the mark MISS NUDE INTERNATIONAL.

Request 3:

Admit that The World's Pageants, LLC's predecessor-in-interest, R&D Promotions, Inc., is the owner of record of U.S. Trademark Registration No. 2,037,202 for MISS NUDE INTERNATIONAL.

Request 4:

Admit that Registration No. 2.037,202 is incontestable.

Request 5:

Admit that The World's Pageants, LLC has used the mark MISS NUDE INTERNATIONAL, through its predecessors-in-interest, since at least as early as June 1, 1991.

Request 6:

Admit that Miss G-String International, LLC did not use "MISS G-STRING INTERNATIONAL" prior to June 1, 1991.

Request 7:

Admit that Miss G-String International, LLC did not use "MISS G-STRING INTERNATIONAL" prior to The World's Pageants, LLC's use of the MISS NUDE INTERNATIONAL mark.

Request 8:

Admit that Miss G-String International, LLC Miss G-String International, LLC was aware of The World's Pageants, LLC's MISS NUDE INTERNATIONAL mark prior to its adoption and use of "MISS G-STRING INTERNATIONAL".

Request 9:

Admit that Miss G-String International, LLC was aware of The World's Pageants, LLC's MISS NUDE INTERNATIONAL mark prior to its adoption and use of "MISS G-STRING INTERNATIONAL".

Request 10:

Admit that Miss G-String International, LLC uses "MISS G-STRING INTERNATIONAL" in connection with conducting beauty competitions.

Request 11:

Admit that The World's Pageants, LLC uses the MISS NUDE INTERNATIONAL mark in connection with conducting beauty competitions.

Request 12:

Admit that Miss G-String International, LLC uses "MISS G-STRING INTERNATIONAL" in connection with promoting beauty pageants.

Request 13:

Admit that The World's Pageants, LLC uses the MISS NUDE INTERNATIONAL mark in connection with promoting beauty pageants.

Request 14:

Admit that Miss G-String International, LLC uses "MISS G-STRING INTERNATIONAL" in connection with entertainment services.

Request 15:

Admit that The World's Pageants, LLC uses the MISS NUDE INTERNATIONAL mark in connection with entertainment services.

Request 16:

Admit that Miss G-String International, LLC's services under "MISS G-STRING INTERNATIONAL" are identical to the services offered by The World's Pageants, LLC under the MISS NUDE INTERNATIONAL mark.

Request 17:

Admit that Miss G-String International, LLC's services under "MISS G-STRING INTERNATIONAL" are substantially similar to the services offered by The World's Pageants, LLC under the MISS NUDE INTERNATIONAL mark.

Request 18:

Admit that Miss G-String International, LLC's customers, clients, or consumers include the general public.

Request 19:

Admit that The World's Pageants, LLC's customers, clients, or consumers include the general public.

Request 20:

Admit that Miss G-String International, LLC 's customers, clients, or consumers include consumers of entertainment services.

Request 21:

Admit that The World's Pageants, LLC's customers, clients, or consumers include consumers of entertainment services.

Request 22:

Admit that Miss G-String International, LLC's customers, clients, or consumers include beauty pageant competitors and/or contestants.

Request 23:

Admit that The World's Pageants, LLC's customers, clients, or consumers include beauty pageant competitors and/or contestants

Request 24:

Admit that Miss G-String International, LLC's customers, clients, or consumers include promoters of beauty pageants.

Request 25:

Admit that The World's Pageants, LLC's customers, clients, or consumers include promoters of beauty pageants.

Request 26:

Admit that Miss G-String International, LLC's customers, clients, or consumers include those who conduct beauty competitions.

Request 27:

Admit that The World's Pageants, LLC's customers, clients, or consumers include those who conduct beauty competitions.

Request 28:

Admit that Miss G-String International, LLC's customers, clients, or consumers are identical or substantially similar to The World's Pageants, LLC's customers, clients, or consumers.

Request 29:

Admit that Miss G-String International, LLC never requested permission from The World's Pageants, LLC to use "MISS G-STRING INTERNATIONAL".

Request 30:

Admit that Miss G-String International, LLC's use of and application for "MISS G-STRING INTERNATIONAL" has been without the consent of The World's Pageants, LLC.

Request 31:

Admit that "MISS G-STRING INTERNATIONAL" is similar to MISS NUDE INTERNATIONAL in sight, sound, and meaning.

Request 32:

Admit that "MISS G-STRING INTERNATIONAL" is likely to cause confusion with The World's Pageants, LLC's MISS NUDE INTERNATIONAL mark.

Request 33:

Admit that in choosing the mark MISS G-STRING INTERNATIONAL, Miss G-String International, LLC intended to trade off the goodwill established by The World's Pageants, LLC's MISS NUDE INTERNATIONAL mark.

Request 34:

Admit that in choosing the mark MISS NUDE WORLD, Miss G-String International, LLC intended to trade off the goodwill established by The World's Pageants, LLC under the MISS NUDE INTERNATIONAL mark.

Request 35:

Admit that the MISS NUDE INTERNATIONAL mark is famous.

Request 36:

Admit that the MISS NUDE INTERNATIONAL mark is distinctive.

Request 37:

Admit that in Application No. 77/753,000 Miss G-String International, LLC disclaimed the term "G-STRING".

Request 38:

Admit that in Application No. 77/753,000 Miss G-String International, LLC disclaimed the phrase "G-STRING INTERNATIONAL".

Request 39:

Admit that Application No. 77/753,000 became abandoned on October 13, 2010.

Request 40:

Admit that Applicant had actual knowledge of Opposer's use or intent to use the mark "MISS NUDE INTERNATIONAL" at least as early as March 27, 1996, which is the filing date of United States Trademark Application Serial No. 75/079,154.

Request 41:

Admit that Applicant had constructive knowledge of Opposer's use or intent to use the mark "MISS NUDE INTERNATIONAL" at least as early as March 27, 1996, which is the filing date of United States Trademark Application Serial No. 75/079,154.

Request 42:

Admit that Applicant had constructive knowledge of Opposer's use or intent to use the mark "MISS NUDE INTERNATIONAL" at least as early as November 19, 1996, which is the date United States Trademark Application Serial No. 75/079,154 was published for opposition.

Request 43:

Admit that Applicant's customers, clients or consumers are purveyors of nude live entertainment services and/or pornographic materials.

Request 44:

Admit that Opposer's customers, clients or consumers are purveyors of nude live entertainment services and/or pornographic materials.

Request 45:

Admit that the contestants in Applicant's beauty competitions include nude entertainers, nude dancers, exotic dancers, and pornographic film actors.

Request 46:

Admit that the contestants in Opposer's beauty pageants include nude entertainers, nude dancers, exotic dancers, or pornographic film actors.

Request 47:

Admit that promoters of Applicant's beauty competition services include establishments providing nude entertainment services, such as topless or nude exotic dancers, strip-tease acts, burlesque shows and the like.

Request 48:

Admit that promoters of Opposer's beauty pageant services include establishments that provide nude entertainment services, such as topless or nude exotic dancers, strip-tease acts, burlesque shows and the like.

Request 49:

Admit that advertising pertaining to Applicant's entertainment services appears in pornographic magazines and/or web sites that provide pornographic materials.

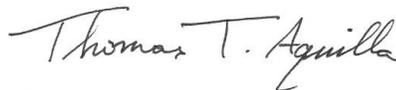
Request 50:

Admit that advertising pertaining to Opposer's entertainment services appears in pornographic magazines and/or web sites that provide pornographic materials.

Request 51:

Admit that Applicant waived its right to contest the validity of U.S. Trademark Registration No. 2,037,202 for MISS NUDE INTERNATIONAL for the purposes of this Opposition.

Respectfully Submitted:



Dated: September 21, 2011

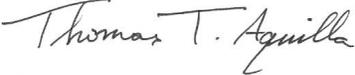
By: /Thomas T. Aquilla/

ATTORNEY FOR OPPOSER
Registration No. 43,473
(603) 253-9474
Aquilla Patents & Marks PLLC

221 Coe Hill Road
Center Harbor, NH 03226

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been mailed via the U.S. Postal Service via First Class Mail, in an envelope addressed to Counsel for Applicant, Luke Lirot, Esq., Miss G-String International, 1420 Sunningdale Lane, Ormond Beach, FL, 32174, on this 21st day of September, 2011.



Thomas T. Aquilla, Esq.

EXHIBIT H

Attorney Docket No.: TWP-701L

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

THE WORLD'S PAGEANTS, LLC,)	
Opposer,)	Opposition No. 91,200,183
)	
)	For: "MISS G-STRING
)	INTERNATIONAL"
)	
v.)	Serial No. 77/753,000
)	Published December 7, 2010
MISS G-STRING INTERNATIONAL, LLC,)	
Applicant.)	
)	

COMMISSIONER OF TRADEMARKS
2900 Crystal Drive
Arlington, VA 22202-3513

**OPPOSER THE WORLD'S PAGEANTS, LLC'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND THINGS TO APPLICANT MISS G-STRING
INTERNATIONAL, LLC**

Pursuant to the provisions of 37 CFR §2.120 and Rule 34 of the Federal Rules of Civil Procedure, Opposer, The World's Pageants, LLC, hereby serves the following Requests for Production of Documents and Things upon Applicant, Miss G-String International, LLC, to be responded to and complied with fully within thirty (30) days of service thereof.

INSTRUCTIONS AND DEFINITION OF TERMS

The Definitions and Instructions included in Opposer's First Set of Interrogatories to Applicant, served September 19, 2011, are hereby incorporated by reference.

REQUESTS FOR PRODUCTION

Request 1:

Produce all documents and things relating to Applicant's selection and adoption of the MISS G-STRING INTERNATIONAL as its mark.

Request 2:

Produce all documents relating to Application Serial No. 77/753,000, or any other application or registration owned by Applicant for any mark that includes "MISS" and "INTERNATIONAL" as part of the same mark.

Request 3:

Produce all trademark search reports, studies, or investigations relating or referring to the MISS G-STRING INTERNATIONAL Mark.

Request 4:

Produce representative samples of all actual or intended uses of the MISS G-STRING INTERNATIONAL Mark, including each different advertisement, brochure, and the like. Photographs or color copies may be produced if the production of a sample is impossible or impractical under the circumstances.

Request 5:

Produce all documents relating to or constituting any agreement, assignment, consent, authorization, permission, or license made between Applicant and any other entity, or made on Applicant' behalf, to use any of the MISS G-STRING INTERNATIONAL Mark.

Request 6:

Produce each survey (including pilot surveys or aborted surveys) conducted by or on Applicant's behalf relating to use of any of the MISS G-STRING INTERNATIONAL Marks, and all documents relating thereto.

Request 7:

Produce all studies that relate to any issue in this proceeding, including for example, consumer surveys related to any of the MISS G-STRING INTERNATIONAL Marks and/or the goods or services Applicant has offered or intends to offer using those marks, and market research relating to the mark and/or the goods or services Applicant has offered or intends to offer using the mark, whether or not prepared in connection with this case.

Request 8:

Produce all business or marketing plans relating to the MISS G-STRING INTERNATIONAL Marks and/or the goods or services Applicant sells or plans to sell using the MISS G-STRING INTERNATIONAL Marks.

Request 9:

Produce documents sufficient to identify all classes of persons to whom Applicant offers, has offered, or intends to offer its goods or services using any of the MISS G-STRING INTERNATIONAL Marks.

Request 10:

Produce documents sufficient to show Applicant's actual and anticipated advertising and promotional expenditures in the United States and elsewhere for goods or services offered using the MISS G-STRING INTERNATIONAL Marks.

Request 11:

Produce a copy of each television and radio advertisement Applicant has run for any of the MISS G-STRING INTERNATIONAL Marks, and all documents concerning each such advertisement, including documents sufficient to show where and when each such ad was broadcast, and the geographic reach of such broadcasts.

Request 12:

Produce a copy of each printed advertisement Applicant has run for any of the MISS G-STRING INTERNATIONAL Marks, and all documents concerning each such advertisement, including documents sufficient to show where and when each such ad was run.

Request 13:

Produce all documents referring or relating to media coverage Applicant has received in connection with the goods and services offered under any of the MISS G-STRING INTERNATIONAL Marks.

Request 14:

Produce documents sufficient to show Applicant's actual and anticipated sales of goods or services in the United States and elsewhere using the MISS G-STRING INTERNATIONAL Marks.

Request 15:

Produce all documents and things that Applicant intends to offer as exhibits during this proceeding.

Request 16:

Produce documents sufficient to show the geographic area in which Applicant uses or plans to use the MISS G-STRING INTERNATIONAL Marks and the length of time during which each good or service offered or planned to be offered using those marks has been or will be marketed in each territory.

Request 17:

Produce all documents that contain or refer to communications to or from consumers and/or potential consumers regarding or referring to any of the MISS G-STRING INTERNATIONAL Marks or goods or services Applicant offers or plans to offer using those marks.

Request 18:

Produce all documents that support or relate to Applicant's contention that the MISS G-STRING INTERNATIONAL Marks have become distinctive of Applicant's services.

Request 19:

Produce all documents that support the Affirmative Defenses in Applicant's Answer to Opposer's Notice of Opposition.

Request 20:

Produce all documents sufficient to show the date(s) of Applicant's first use and date(s) of Applicant's first use in commerce of the MISS G-STRING INTERNATIONAL Marks.

Request 21:

Produce documents sufficient to show any and all changes made to the MISS G-STRING INTERNATIONAL Marks and to how Applicant has used those marks since their first uses on or in connection with Applicant's goods or services, including when those changes occurred and the reasons for the changes.

Request 22:

Produce all documents reviewed or relied upon by Applicant in answering Opposer's First Set of Interrogatories to Applicant, and not otherwise produced in response to a more specific request herein.

Request 23:

Produce all documents identified in response to any interrogatory served on Applicant in this proceeding.

Request 24:

Produce at least one original specimen of each and every version of advertising and promotional materials Applicant has used, currently uses, and/or intends to use in relation to Applicant's use of the MISS G-STRING INTERNATIONAL Marks on goods or services Applicant has offered or intends to offer using that mark, including but not limited to web pages, advertisements, brochures, press releases, invoices, and other promotional material or literature. Include with each item documents that provide the date(s) of use, intended use or publication and, as appropriate, a description of where the advertisement or promotion appeared or will appear.

Request 25:

Produce documents that disclose the identity of representatives, agents, or other distribution mechanisms through which goods or services using the MISS G-STRING INTERNATIONAL Marks are sold, have been offered or sold, or are intended to be offered or sold to consumers.

Request 26:

For each individual whom Applicant may call to testify as an expert witness, produce the following:

- a. A written report containing a complete statement of all of the expert's opinions and conclusions relevant to this cause and grounds therefor;
- b. Any and all information considered by the witness in forming the expert's opinions;
- c. Any exhibits to be used as summary of or in support of the expert's conclusions;
- d. A current resume, curriculum vitae or other similar document listing the qualifications of the witness, including a list of all publications authored by the witness since 2000; and
- e. A list of other cases in which the witness has testified at trial or by deposition within the last four years

Request 27:

For each fact witness whom Applicant intends to call in this proceeding, produce the following:

- a. A resume or employment history; and

b. All documents considered or reviewed by the witness in preparing to testify in this proceeding

Request 28:

Produce all documents that mention or discuss any third parties that Applicant is aware of that have sold or referred to any products or services using "MISS" and "INTERNATIONAL" as part of the same mark or phrase.

Request 29:

Produce all documents in Applicant's possession, custody, or control that refer or relate to Opposer, or Opposer's use of the mark MISS NUDE INTERNATIONAL.

Request 30:

Produce all documents and tangible things that relate to or refer in any way to any instances of confusion of which you are aware that resulted from your use of any of the MISS G-STRING INTERNATIONAL Marks.

Request 31:

Produce all documents and things relating or referring to each conflict, dispute, or litigation involving any of the MISS G-STRING INTERNATIONAL Marks, specifically including all related settlement documents and all related communications, both internal and external, whether such communications originated with you or a third party and whether or not suit was ever filed.

Request 32:

Produce all documents relating to any investigation conducted by you, or on your behalf, relating to recognition of, or reaction to, any likelihood of confusion between the mark MISS G-STRING INTERNATIONAL and the MISS NUDE INTERNATIONAL Marks (including stylized or design forms of those marks).

Request 33:

Produce all documents relating to complaints or dissatisfaction with the products or services offered under any of the MISS G-STRING INTERNATIONAL Marks.

Request 34:

Produce all documents that refer or relate to the circumstances surrounding your initial awareness of Opposer's use and registration of its MISS NUDE INTERNATIONAL mark.

Request 35:

Produce all documents relating to communications between you or your licensees and any third party in which Opposer or its MISS NUDE INTERNATIONAL mark are referred to or otherwise mentioned.

Request 36:

Produce all documents that refer or relate to any instance in which you have objected in any way to a third party's use, registration, or application for registration of a mark, product name, or designation that you claimed was confusingly similar to any of the MISS G-STRING INTERNATIONAL Marks.

Request 37:

Produce all documents that refer or relate to any instances in which a third party has objected in any way to your use, registration, or application for registration of any of the MISS G-STRING INTERNATIONAL Marks.

Request 38:

Produce all documents and things concerning any incidents of actual or possible confusion between Opposer and Applicant.

Request 39:

Produce all documents and things concerning any incidents involving persons inquiring about or requesting products or services under or in connection with the mark MISS NUDE INTERNATIONAL, where there is any indication that such persons were confused or mistaken about the source of such products or services or the relationship of or between Opposer and Applicant.

Request 40:

Produce all documents and things concerning each contest that Applicant is aware of that has used or that uses the MISS G-STRING INTERNATIONAL Marks, including but not limited to advertisements promoting the contest and documents showing the date the contest was held, where it was held, how many people attended, and a list of attendees.

Request 41:

Produce all documents and things concerning any email or mailing lists used in connection with promoting any goods or services under the MISS G-STRING INTERNATIONAL Marks.

Request 42:

Produce all documents and things concerning any allegations of abandonment of the MISS G-STRING INTERNATIONAL Marks.

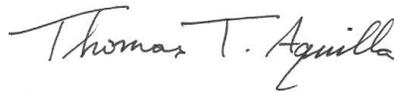
Request 43:

Produce all documents and things concerning any filing with the Florida Department of State, Division of Corporations by William Eadie in the name of R&D Promotions, Inc.

Request 44:

Produce all documents and things concerning any filing with the Florida Department of State, Division of Corporations by William Eadie in the name of The World's Pageants, LLC.

Respectfully Submitted:



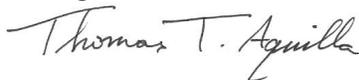
Dated: September 24, 2011

By: /Thomas T. Aquilla/

ATTORNEY FOR OPPOSER
Registration No. 43,473
(603) 253-9474
Aquila Patents & Marks PLLC
221 Coe Hill Road
Center Harbor, NH 03226

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been mailed via the U.S. Postal Service via First Class Mail, in an envelope addressed to Counsel for Applicant, Luke Lirot, Esq., at the Correspondence Address of record in the Opposition, Miss G-String International, 1420 Sunningdale Lane, Ormond Beach, FL, 32174, on this 24th day of September, 2011.



Thomas T. Aquilla, Esq.

EXHIBIT I

Opposition No. 91,200,183
Attorney Docket No.: CPL-701L

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

THE WORLDS PAGEANTS LLC and)	
CAMILA PRODUCTIONS LTD)	
Opposer,)	Opposition No. 91,200,183
)	
)	For: "MISS G-STRING
)	INTERNATIONAL"
)	
v.)	Serial No. 77/753,000
)	Published December 7, 2010
)	
MISS G-STRING INTERNATIONAL, LLC)	
Applicant.)	

COMMISSIONER OF TRADEMARKS
2900 Crystal Drive
Arlington, VA 22202-3513

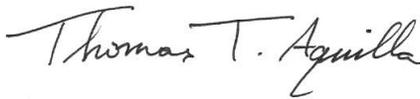
SECOND DECLARATION OF THOMAS T. AQUILLA

I, Thomas T. Aquilla, the undersigned, do hereby declare and state as follows:

1. I am the attorney of record for Opposer, The Worlds Pageants, LLC, assignee of Registration No. 2,037,202 for MISS NUDE INTERNATIONAL, which is registered on the Principal Register and incontestable.
2. On September 19, 2011, Opposer's First Set of Interrogatories were served by me on Applicant, Miss G-String International, LLC, through its attorney, Luke Lirot. A copy of Opposer's First Set of Interrogatories is attached to Opposer The Worlds Pageants, LLC's Motion for Summary Judgment as Exhibit F.
3. On September 21, 2011, Opposer's First Set of Requests for Admissions were served by me on Applicant, Miss G-String International, LLC, through its attorney, Luke Lirot. A

copy of Opposer's First Set of Requests for Admissions is attached to Opposer The Worlds Pageants, LLC's Motion for Summary Judgment as Exhibit G.

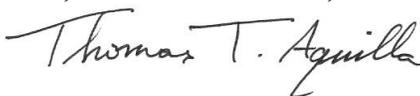
4. On September 24, 2011, Opposer's First Set of Requests for Production of Documents and Things were served by me on Applicant, Miss G-String International, LLC, through its attorney, Luke Lirot. A copy of Opposer's First Set of Requests for Production of Documents and Things is attached to Opposer The Worlds Pageants, LLC's Motion for Summary Judgment as Exhibit H.
5. To date, we have not been served with any responses to any discovery request, including Opposer's First Set of Requests for Admissions.
6. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code, and that such willful false statements may jeopardize the validity of the application or any patent or trademark issued thereon.



Thomas T. Aquilla Date: December 18, 2013

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been mailed via the U.S. Postal Service via First Class Mail, in an envelope addressed to Counsel for Petitioner, Luke Charles Lirot, 2240 Belleair Road, Suite 190 Clearwater FL 33764, on **December 18, 2013**.



Thomas T. Aquilla, Esq.