

ESTTA Tracking number: **ESTTA581304**

Filing date: **01/10/2014**

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

Proceeding	91200183
Party	Defendant Miss G-String International LLC
Correspondence Address	LUKE LIROT LUKE CHARLES LIROT PA 2240 BELLEAIR ROAD, SUITE 190 CLEARWATER, FL 33764 UNITED STATES luke2@lirotlaw.com, jimmy@lirotlaw.com, krista@lirotlaw.com
Submission	Other Motions/Papers
Filer's Name	Luke Lirot
Filer's e-mail	luke2@lirotlaw.com, jimmy@lirotlaw.com, krista@lirotlaw.com
Signature	/s/Luke Lirot
Date	01/10/2014
Attachments	Notice of Filing for Service of Applicant's Response to Opposer's First Set of Requests for Admissions - as filed - 1-10-14.pdf(40088 bytes) Applicant's Response to Opposer's First Set of Requests for Admissions - as filed - 1-10-14.pdf(87179 bytes) Notice of Filing for Service of Applicant's Response to Opposer's First Set of Interrogatories - as filed - 1-10-14.pdf(39225 bytes) Applicant's Response to Opposer's First Set of Interrogatories - as filed - 1-10-14.pdf(530310 bytes) Notice of Filing for Service of Applicant's Response to Opposer's First Set of equests for Production of Documents - as filed - 1-10-14.pdf(41693 bytes) Applicant's Response to Opposer's First Set of Requests for Production of Documents - as filed - 1-10-14.pdf(332770 bytes) Exhibits to Request for Production of Documents and Things - as filed - 1-10-14.pdf(5785311 bytes)

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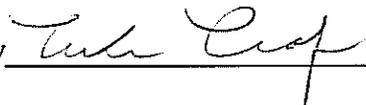
THE WORLDS PAGEANTS, LLC and)	Opposition No. 91,200,183
Camilla Productions, Ltd.)	
)	
Opposer,)	For: "MISS G-STRING
)	INTERNATIONAL"
v.)	
)	
MISS G-STRING INTERNATIONAL, LLC)	Serial No. 77/753,000
)	Published: December 7, 2010
Applicant.)	

COMMISSIONER OF TRADEMARKS
UNITED STATES PATENT AND TRADEMARK OFFICE
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

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

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, and 37 C.F.R. Section 2.120 MISS G-STRING INTERNATIONAL, LLC, a Florida Corporation, ("APPLICANT"), by and through their Attorney, Luke Lirot, hereby gives notice of the filing of the *Applicant Miss G-string International, LLC's Response To Opposer The World Pageants, LLC's First Set Of Requests For Admissions*, dated and filed September 21, 2011, by Attorney Thomas Aquilla ("AQUILLA"), representing The Worlds Pageants, LLC ("OPPOSER").

Respectfully Submitted:

By 

Dated: January 10, 2014

Luke Lirot, Esquire

Florida Bar Number 714836
LUKE CHARLES LIROT, P.A.
2240 Belleair Road, Suite 190
Clearwater, Florida 33764
Telephone: (727) 536-2100
Facsimile: (727) 536-2110
Attorney for the Applicant

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing APPLICANT MISS G-STRING INTERNATIONAL, LLC'S RESPONSE TO OPPOSER THE WORLD PAGEANTS, LLC'S FIRST SET OF REQUESTS FOR ADMISSIONS has been served on Thomas T. Aquilla, Esq., as domestic representative of The Worlds Pageants, LLC, and Camilla Productions, Ltd., by mailing said copy on January 10, 2014, via First Class Mail, postage prepaid to:

Thomas T. Aquilla, Esq.
221 Coe Hill Road
Center Harbor, New Hampshire 03226



Attorney for Applicant
Signed January 10, 2014

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

THE WORLDS PAGEANTS, LLC and)	Opposition No. 91,200,183
Camilla Productions, Ltd.)	
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**APPLICANT MISS G-STRING INTERNATIONAL, LLC'S RESPONSE TO OPPOSER
THE WORLD PAGEANTS, LLC'S FIRST SET OF REQUESTS FOR ADMISSIONS**

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, and 37 C.F.R. Section 2.120 MISS G-STRING INTERNATIONAL, LLC, a Florida Corporation, ("APPLICANT"), by and through their Attorney, Luke Lirot, respectfully submits this *Response To Opposer The World Pageants, LLC's First Set Of Requests For Admissions*, dated and filed September 21, 2011, by Attorney Thomas Aquilla ("AQUILLA"), representing The Worlds Pageants, LLC ("OPPOSER").

RESPONSES

Response to Admission No. 1:

Unknown, therefore denied.

Response to Admission No. 2:

Unknown, therefore denied.

Response to Admission No. 3:

Unknown, therefore denied.

Response to Admission No. 4:

Objection, as the statement calls for a legal conclusion.

Response to Admission No. 5:

Unknown, therefore denied.

Response to Admission No. 6:

Admit.

Response to Admission No. 7:

Unknown, therefore denied.

Response to Admission No. 8:

Denied.

Response to Admission No. 9:

Denied.

Response to Admission No. 10:

Admit, as it pertains to general trade mark category.

Response to Admission No. 11:

Unknown, therefore denied.

Response to Admission No. 12:

Admit.

Response to Admission No. 13:

Unknown, therefore denied.

Response to Admission No. 14:

Admit.

Response to Admission No. 15:

Unknown, therefore denied.

Response to Admission No. 16:

Denied.

Response to Admission No. 17:

Denied.

Response to Admission No. 18:

Admit.

Response to Admission No. 19:

Unknown, therefore denied.

Response to Admission No. 20:

Admit.

Response to Admission No. 21:

Unknown, therefore denied.

Response to Admission No. 22:

Unknown, therefore denied.

Response to Admission No. 23:

Unknown, therefore denied.

Response to Admission No. 24:

Denied.

Response to Admission No. 25:

Unknown, therefore denied.

Response to Admission No. 26:

Admit.

Response to Admission No. 27:

Unknown, therefore denied.

Response to Admission No. 28:

Denied.

Response to Admission No. 29:

Admit.

Response to Admission No. 30:

Admit.

Response to Admission No. 31:

Denied.

Response to Admission No. 32:

Denied.

Response to Admission No. 33:

Denied.

Response to Admission No. 34:

Denied.

Response to Admission No. 35:

Denied.

Response to Admission No. 36:

Denied.

Response to Admission No. 37:

Denied.

Response to Admission No. 38:

Admit.

Response to Admission No. 39:

Denied.

Response to Admission No. 40:

Denied.

Response to Admission No. 41:

Denied.

Response to Admission No. 42:

Denied.

Response to Admission No. 43:

Denied.

Response to Admission No. 44:

Unknown, therefore denied.

Response to Admission No. 45:

Admitted as to exotic dancers and pornographic film actors, otherwise denied.

Response to Admission No. 46:

Unknown, therefore denied.

Response to Admission No. 47:

Admit.

Response to Admission No. 48:

Unknown, therefore denied.

Response to Admission No. 49:

Denied.

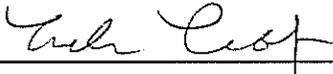
Response to Admission No. 50:

Unknown, therefore denied.

Response to Admission No. 51:

Denied.

Respectfully Submitted:

By 

Dated: January 10, 2014

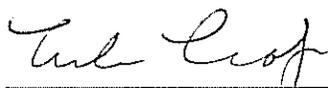
Luke Lirot, Esquire
Florida Bar Number 714836
LUKE CHARLES LIROT, P.A.
2240 Belleair Road, Suite 190
Clearwater, Florida 33764
Telephone: (727) 536-2100
Facsimile: (727) 536-2110
Attorney for the Applicant

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing APPLICANT MISS G-STRING INTERNATIONAL, LLC'S RESPONSE TO OPPOSER THE WORLD PAGEANTS, LLC'S FIRST SET OF REQUESTS FOR ADMISSIONS has been served on Thomas T.

Aquila, Esq., as domestic representative of The Worlds Pageants, LLC, and Camilla Productions, Ltd., by mailing said copy on January 10, 2014, via First Class Mail, postage prepaid to:

Thomas T. Aquilla, Esq.
221 Coe Hill Road
Center Harbor, New Hampshire 03226



Attorney for Applicant
Signed January 10, 2014

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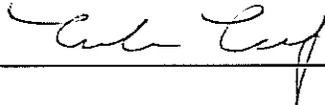
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**NOTICE OF FILING FOR SERVICE OF APPLICANT MISS G-STRING
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Pursuant to Rule 33 of the Federal Rules of Civil Procedure, and 37 C.F.R. Section 2.120
MISS G-STRING INTERNATIONAL, LLC, a Florida Corporation, ("APPLICANT"), by and
through their Attorney, Luke Lirot, hereby gives notice of the filing of the *Applicant Miss G-
string International, LLC's Response To Opposer The World Pageants, LLC's First Set Of
Interrogatories*, dated and filed September 19, 2011, by Attorney Thomas Aquilla
("AQUILLA"), representing The Worlds Pageants, LLC ("OPPOSER").

Respectfully Submitted:

By  _____

Dated: January 10, 2014

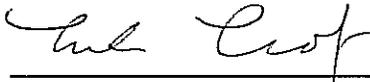
Luke Lirot, Esquire

Florida Bar Number 714836
LUKE CHARLES LIROT, P.A.
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Pursuant to Rule 33 of the Federal Rules of Civil Procedure, and 37 C.F.R. Section 2.120, MISS G-STRING INTERNATIONAL, LLC, a Florida Corporation, ("APPLICANT"), by and through their Attorney, Luke Lirot, respectfully submits this *Response To Opposer The World Pageants, LLC's First Set Of Interrogatories*, dated and filed September 19, 2011, by Attorney Thomas Aquilla ("AQUILLA"), representing The Worlds Pageants, LLC ("OPPOSER").

RESPONSES

Response to Interrogatory No 1:

Applicant's business is entertainment services in the nature of conducting beauty pageants and talent contests, first used on 04/29/2009.

Response to Interrogatory No 2:

The past and present owners consist of William Eadie, Managing Member, and Edward H. Street, Member. William Eadie is the current Managing Member since inception of the Mark, on April 29, 2009. Edward H. Street became a Member in 2010. Applicant has used the MISS G-STRING INTERNATIONAL mark in conducting beauty pageants.

Response to Interrogatory No 3:

As a limited liability company, MISS G-STRING INTERNATIONAL, LLC does not have officers and directors, but rather Managers and Members.

The past and present partners of Applicant are William Eadie, Managing Member and Edward H. Street, Member. William Eadie is and has been the Managing Member since Applicant's inception on 4/29/09. Edward H. Street became a Member in 2010.

Applicant's past Attorney erroneously listed Linda S. Fullen as the Managing Member in the original State of Florida Articles of Incorporation. Ms. Fullen has never been a member in Applicant; she was merely acting as the authorized representative for William Eadie, Managing Member.

Response to Interrogatory No 4:

Applicant has sold no goods using the MISS G-STRING INTERNATIONAL mark. William Eadie, Managing Member, has been and is now responsible for marketing, advertising, promotions and bookkeeping and accounting.

Response to Interrogatory No 5:

The person most knowledgeable about Applicant's sales, advertising and sales promotion is William Eadie, Managing Member. Applicant has not licensed, assigned or transfer any rights of the MISS G-STRING INTERNATIONAL mark.

Response to Interrogatory No 6:

Applicant has sold no goods using the MISS G-STRING INTERNATIONAL mark. The person likely to have knowledge of discoverable information including Applicant's selection and adoption of the MISS G-STRING INTERNATIONAL mark, sales, marketing, advertising and promotion of services offer using the mark is William Eadie.

Response to Interrogatory No 7:

Applicant has sold no goods using the MISS G-STRING INTERNATIONAL mark.

Response to Interrogatory No 8:

The word “Miss” and “International” is common usage in beauty pageants, like the “Miss Hawaiian Tropic International” pageants, which identifies it with specificity from all others by incorporating their product name, Hawaiian Tropic. Their successful identity led Applicant to consider promotions in which all contestants’ stage apparel would include a specific article of clothing, a women’s G-string undergarment. Applicant’s use of the phrase “MISS G-STRING INTERNATIONAL” would likewise identify with specificity from all others. Applicant decided to use a design mark to reduce any possibility of confusion and used Eadie’s photograph of a woman wearing a G-string undergarment as the basis for the design mark. No alternative names were considered. William Eadie was the sole person involved in the selection process.

Response to Interrogatory No 9:

Applicant performed a search of the United States Patent and Trademark Office website for registered trademarks using the words “Miss” and “International” which resulted in a substantial list of registered trademarks using both words. No documents are available which refer to or relate to such inquiry, investigation, survey, evaluation or study as none were performed. William Eadie was the sole person involved in the selection process.

Response to Interrogatory No 10:

The statements or opinions obtained by or for Applicant regarding any issue in this opposition proceeding was from Applicant’s attorney, J. Benton Stewart II.

Response to Interrogatory No 11:

Applicant’s initial awareness occurred in early May, 2009. Applicant was informed that Gracinda Cardoso telephoned Paradise Lakes Resort, accusing the resort of using photographs of models without her consent in their webpage advertisement for the upcoming Miss G-String International Pageant. She further alleged that they had infringement upon her trademark, MISS NUDE INTERNATIONAL, and threatened to terminate the event.

William Eadie was contacted by Christian Schrangl, General Manager of Paradise Lakes Resort, the next day. Mr. Eadie was asked to contact Ms. Cardoso, which he did. He informed Ms. Cardoso that the photographs she alleged were used without her consent were, in fact, photographed by Mr. Eadie and that he owned the copyright for the images, to which she held no claim. She immediately conceded to Mr. Eadie’s copyrights.

On May 5, 2009, Mr. Schrangl e-mailed and mailed via USPS a letter informing her that her allegations of unauthorized use of Mr. Eadie’s intellectual property “*are false and without foundation.*”

Mr. Schrangl further directed Ms. Cardoso to contact Applicant’s Attorney, J. Benton Stewart II, Esquire to address any alleged infringement upon her trademark, that her threats to terminate

this promotion will not be tolerated, to have no further contact with Paradise Lakes Resort under any circumstances, and notified her in writing that *"If you elect to make any contact with Paradise Lakes Resort in any manner, we and the promoter will immediately file a civil action against you for tortious interference with an ongoing contractual relationship and pursue all remedies available to us under the law."*

Response to Interrogatory No 12:

The mark MISS G-STRING INTERNATIONAL was first used on April 29, 2009, by Paradise Lakes Resort on their webpage to advertise Applicant's beauty pageant.

Response to Interrogatory No 13:

The MISS G-STRING INTERNATIONAL mark was used at Paradise Lakes Resort in Lutz, Florida on October 1, 2009. Approximately 300 people were in attendance. Media coverage was by PLAYBOY. William Eadie was in charge of organizing the event.

The MISS G-STRING INTERNATIONAL mark was next used at Rick's Cabaret and Rick's Sporting Saloon on March 4, 2010, in New Orleans, Louisiana. Approximately 750 people were in attendance. Media Coverage was by PLAYBOY. William Eadie was in charge of organizing the event.

The MISS G-STRING INTERNATIONAL mark was next used at Rick's Cabaret and Rick's Sporting Saloon on February 8, 2011, in New Orleans, Louisiana. Approximately 750 people were in attendance. Media Coverage was by PLAYBOY.

The MISS G-STRING INTERNATIONAL mark was next used at The Broken Spoke Saloon on March 15, 2012, in Ormond Beach, Florida. Approximately 4,000 people were in attendance. Media Coverage was by various trade magazines. William Eadie was in charge of organizing the event.

The MISS G-STRING INTERNATIONAL mark was next used by at The Coca Cola Pavilion at Destination Daytona on October 18, 2012, in Ormond Beach, Florida. Approximately 1,000 people were in attendance. Media Coverage was by various trade magazines. William Eadie was in charge of organizing the event.

The MISS G-STRING INTERNATIONAL mark was next used at The Boot Hill Saloon on October 18, 2013, in Daytona Beach, Florida. Approximately 1,000 people were in attendance. Media Coverage was by various trade magazines. William Eadie was in charge of organizing the event.

Response to Interrogatory No 14:

The MISS G-STRING INTERNATIONAL mark has no period of nonuse, and remains active.

Response to Interrogatory No 15:

The MISS G-STRING INTERNATIONAL mark has had no changes.

Response to Interrogatory No 16:

The MISS G-STRING INTERNATIONAL mark has no registrations other than that pending with the USPTO.

Response to Interrogatory No 17:

Applicant has no knowledge of any products or services sold using a mark which incorporates the terms "MISS" and "INTERNATIONAL", as Applicant is not privileged to such information.

Response to Interrogatory No 18:

Applicant is aware of 73 registered marks using the terms "Miss" and "International" as listed on the USPTO Trademark Electronic Search System (TESS) identified as Exhibit A of APPLICANT'S ANSWER TO OPPOSER'S NOTICE OF OPPOSITION on July 19, 2011.

Response to Interrogatory No 19:

No.

Response to Interrogatory No 20:

Applicant has not notified any third party of any trademark or service mark infringed upon Applicant's mark.

Response to Interrogatory No 21:

Applicant has no knowledge of 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.

Response to Interrogatory No 22:

Applicant has sold no products using the MISS G-STRING INTERNATIONAL mark.

Response to Interrogatory No 23:

Hot Action Sportswear of Ormond Beach, Florida has manufactured contestants' tank tops bearing Applicant's Mark for use by its beauty pageant contestants, but not for sale. Applicant has no promoters or intended promoters of services bearing Applicants mark.

Response to Interrogatory No 24:

Applicant has no past or existing relationships related to any third party use of Applicant's MISS G-STRING INTERNATIONAL mark.

Response to Interrogatory No 25:

PLAYBOY has been a presentation sponsor of Applicant. PLAYBOY sent a Photo Editor to judge the beauty pageant at Paradise Lakes Resort in October of 2009. As Applicant's beauty pageant is not nude, any interested contestants were invited to participate in a PLAYBOY model search to be filmed the same weekend which was featured on PLAYBOY.COM. In addition, PLAYBOY offered the winner of the "Most Photogenic" contest a featured pictorial. Applicant received no monetary compensation from PLAYBOY.

PLAYBOY was also a presentation sponsor of Applicant during Mardi Gras of 2010. PLAYBOY photographed a feature pictorial contemporaneous to Applicant's burlesque beauty pageant competition at Rick's Cabaret and Rick's Sporting Saloon. As Applicant's beauty pageant is not nude, any interested contestant were invited to participate in a PLAYBOY model search to be filmed the same weekend which was featured on PLAYBOY.COM. Applicant received no monetary compensation from PLAYBOY.

OBJECTIONS

The Applicant, through the undersigned counsel, hereby objects to all following Interrogatories as exceeding the number of Interrogatories permitted under Rule 33(a)(1) of the Federal Rules of Civil Procedure, which clearly states "... a party may serve on any other party no more than 25 written interrogatories, including all discrete subparts."

37 C.F.R. § 2.120(d)(1) is inconsistent with Rule 33(a)(1), in erroneously stating "The total number of written interrogatories which a party may serve upon another party *pursuant to Rule 33 of the Federal Rules of Civil Procedure*, in a proceeding, shall not exceed seventy-five, counting sub-parts, except that the Trademark Trial and Appeal Board, in its discretion, may allow additional interrogatories upon motion therefor showing good cause, or upon stipulation of the parties, approved by the Board."

As 37 C.F.R. § 2.120(d)(1) permits 75 written interrogatories, which is inconsistent with the limitations set forth in Rule 33 of the Federal Rules of Civil Procedure, which permits 25 written interrogatories, the law governing interrogatories in a proceeding before the Trademark Trial and Appeal Board is ambiguous, at best.

In the spirit of full disclosure and under objection, the Applicant answers the remaining Interrogatories as follows:

Response to Interrogatory No 26:

No.

Response to Interrogatory No 27:

Applicant has sold no goods using the MISS G-STRING INTERNATIONAL mark. Services in the form of beauty pageants have occurred only at the venues identified in *Interrogatory No. 13*.

Response to Interrogatory No 28:

Applicant has sold no goods using the MISS G-STRING INTERNATIONAL mark. Applicant has received payment for services for producing beauty pageants from venues listed in *Interrogatory No. 13* of \$9,500 total.

Response to Interrogatory No 29:

Applicant has sold no goods using the MISS G-STRING INTERNATIONAL mark. Applicant has spent \$2,500 in total advertising for all events listed in *Interrogatory No. 13*.

Response to Interrogatory No 30:

Applicant has sold no goods using the MISS G-STRING INTERNATIONAL mark. Applicant's received no payment for services offered using the MISS G-STRING INTERNATIONAL mark for years 2009-2011 inclusive. Applicant received payment in the amount of \$6,000 for the year 2012 and \$3,500 for the year 2013 for beauty pageant services provided using the MISS G-STRING INTERNATIONAL mark.

Response to Interrogatory No 31:

Applicant has sold no goods using the MISS G-STRING INTERNATIONAL mark.

Response to Interrogatory No 32:

Applicant has used the MISS G-STRING INTERNATIONAL mark for event advertising and stage backdrops. Applicant has provided use of the mark to venues hosting Applicant's beauty pageants for the venue's own advertising purposes to which Applicant has no record.

Response to Interrogatory No 33:

Applicant has sold no goods using the MISS G-STRING INTERNATIONAL mark. Services provided in the form of beauty pageants are limited to venues identified in *Interrogatory No. 13*.

Response to Interrogatory No 34:

Applicant has sold no goods using the MISS G-STRING INTERNATIONAL mark. Applicant purchased an ad in Biker's Pocket Guide for 2012 Daytona Biketoberfest. Applicant has provided use of the mark to venues hosting Applicant's beauty pageants for the venue's own advertising purposes, to which Applicant has no record.

Response to Interrogatory No 35:

Applicant has sold no goods using the MISS G-STRING INTERNATIONAL mark. The venues which have hosted Applicant's beauty pageants are detailed in *Interrogatory No. 13*.

Response to Interrogatory No 36:

Expert witnesses for this action have not yet been identified.

Response to Interrogatory No 37:

William Eadie

All appropriate custodians of records for applicable records

Response to Interrogatory No 38:

Based on information and belief, the Opposer has not been in the business of providing entertainment services, including advertising, promoting and conducting beauty pageants, and has used the mark "MISS NUDE INTERNATIONAL" in interstate commerce well prior to Applicant's filing date for any events similar to the Applicants.

Response to Interrogatory No 39:

Opposer claims it is the assignee of U.S. Registration No. 2,037,202 issued February 11, 1997, for the mark "MISS NUDE INTERNATIONAL" for entertainment services in the nature of promoting and conducting beauty pageants in International Class 041. Applicant disputes that "this registration is valid, incontestable and enforceable," due to legal deficiencies in the assignment and deficiencies in the legal existence of the Opposer's corporate entities, and denies same, as explained in other responses.

Response to Interrogatory No 40:

Opposer claims that, as a result of the use, promotion and advertising of Opposer's "MISS NUDE INTERNATIONAL" mark for the services identified above, Opposer's mark has acquired significant goodwill. Opposer claims that the "MISS NUDE INTERNATIONAL" mark identifies and distinguishes its services from the services of others. The terms are generic and utilized extensively in other contexts, and are dissimilar to the Applicants' business model.

Response to Interrogatory No 41:

Applicant denies that there is any similarity of Applicant's "MISS G-STRING INTERNATIONAL" mark to Opposer's "MISS NUDE INTERNATIONAL" mark. No such similarity is evident from a simple comparison of the marks, since there are scores of marks with similar language, and the services for which Applicant's mark is intended to be used are not closely related to Opposer's services.

Response to Interrogatory No 42:

“Nude” and “G-String” are inconsistent and mutually exclusive concepts, thus there is no basis for Opposer to state that, in view of the similarity of the respective marks and the related nature of the services of the respective parties, it is alleged that Applicant's mark so resembles Opposer's mark as to be likely to cause confusion or to cause mistake or to deceive.

Response to Interrogatory No 43:

“Nude” and “G-String” are inconsistent and mutually exclusive concepts, thus there is no basis for Opposer to state that, in view of the similarity of the respective marks and the related nature of the services of the respective parties, it is alleged that Applicant's mark so resembles Opposer's mark as to be likely to cause confusion or to cause mistake or to deceive.

Response to Interrogatory No 44:

“Nude” and “G-String” are inconsistent and mutually exclusive concepts, thus there is no basis for Opposer to state that, in view of the similarity of the respective marks and the related nature of the services of the respective parties, it is alleged that Applicant's mark so resembles Opposer's mark as to be likely to cause confusion or to cause mistake or to deceive. The different concepts are more than sufficient to prevent confusion or mistake in the minds of consumers and/or lead consumers and prospective purchasers to believe Applicant's services as designated are services of Opposer, or in some way backed by, sponsored by, franchised by, approved by, associated with, or otherwise connected with the good name and reputation of Opposer, to the damage and injury of the purchasing public, and to the damage and injury of Opposer and its goodwill in the "MISS NUDE INTERNATIONAL" mark.

Response to Interrogatory No 45:

Opposer's Notice of Opposition fails to state a claim upon which relief can be granted, and in particular, fails to state legally sufficient grounds for sustaining the opposition, since “Nude” and “G-String” are inconsistent and mutually exclusive concepts, and thus there is no basis for Opposition.

Response to Interrogatory Number 46:

The terms "MS. NUDE INTERNATIONAL" and "MS. G-STRING INTERNATIONAL," to the extent they use the terms "MISS" and "INTERNATIONAL," are highly diluted as a trademark formative, and hence weak, and Opposer's purported rights extend no further than to the specific marks which Opposer alleges as it owns, none of which are the same as or confusingly similar to Applicant's marks in terms of connotation, appearance and/or pronunciation. A Trademark Electronic Search System (TESS) search for marks using “Miss” and “International,” shows that there are 73 marks using those qualifying terms, over half of which are “live.”

Response to Interrogatory Number 47:

Applicant's use of its mark will not mistakenly be thought by the public to derive from the same source as Opposer's goods, nor will such use be thought by the public to be used by Opposer or with the Opposer's authorization or approval. To be abundantly clear, the marks "MISS G-STRING INTERNATIONAL" and "MISS NUDE INTERNATIONAL" are not confusingly similar. Factoring the scores of marks beginning with "Miss" and ending in "International," the concepts of a "G-String" and being "Nude" are mutually exclusive and irreconcilable. A woman's "G-String" undergarment is clothed; "NUDE" connotes a complete lack of any clothing, totally.

Response to Interrogatory Number 48

Applicant's mark, in its entirety, is sufficiently and distinctively different from Opposer's mark to avoid confusion, deception or mistake as to the source or sponsorship or association of Applicant's goods. The description of the marks "MISS NUDE INTERNATIONAL," is described as: "typed drawing." The description of the mark for "MISS NUDE INTERNATIONAL" is described as "the color(s) white, yellow gold, pink and black is/are claimed as a feature of the mark. The mark consists of the stylized wording 'MISS G-STRING INTERNATIONAL' with the word 'G-STRING' in yellow gold. The word 'MISS' in white is above the word 'G-STRING' and the word 'INTERNATIONAL' in white is below the word 'G-STRING.' All of the wording is outlined in black. All of the words are superimposed upon a woman's pink undergarment."

Response to Interrogatory Number 49

Applicant's mark, when used on Applicant's goods, is not likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection or association of Applicant with Opposer, or as to the origin, sponsorship, or approval of Applicant's goods by Opposer. As set forth above, the concepts of a "G-String" and being "Nude" are mutually exclusive and irreconcilable. A woman's "G-String" undergarment is clothed; "NUDE" connotes a complete lack of any clothing, totally. Any claim that there is a likelihood of confusion between "NUDE" and "G-String" under Section 2(d) is without merit. In finding a likelihood of confusion between marks, the board considers the similarity of the marks, goods and services, and similarity of trade channels of the goods and services.¹ Even identical names could be validly registered as trademarks without any risk of confusion so long as they are for different goods and services, as identified in the Applicant's application and registrant's registration.² Indeed, there is no evidence of a plausibly conceivable relationship between "NUDE" and "G-String". Even applying the "something more" test found in *Opus One* and *Jacobs v. International Multifoods Corporation*, which requires a finding of an extremely arbitrary mark being used in relation to a similar or complementary good or service, the marks are unlikely to be confusingly similar.³ Additionally, there is no

¹ *In re Opus One, Inc.*, 60 USPQ2d 1812 (TTAB 2001); *In re Azteca Rest. Enters., Inc.*, 50 USPQ2d 1209 (TTAB 1999).

² *Opus One*, 60 USPQ2d at 1812 citing *Canadian Imperial Bank of Commerce v. Wells Fargo Bank, N.A.*, 811 F.2d 1490, 1 USPQ2d 1813 (Fed. Cir. 1987).

³ *Opus One*, 60 USPQ2d at 1812; *Jacobs v. Int'l Multifoods Corp.*, 688 F.2d 1234, 212 USPQ 642 (CCPA 1982).

complementary relationship between the two marks. The dissimilarities between these marks and respective relationships with their relevant markets are substantial enough to ensure there will be no likelihood of confusion within the consuming public. Based on the evidence, there is no risk of confusion as to any aspect of “NUDE” and “G-String” comprising the same or similar goods, services or relevant markets under Section 2(d).

Response to Interrogatory Number 50

The affirmative defense regarding the legal status of the holder of the mark are explained by the facts supporting this affirmative defense:

1. Applicant is MISS G-STRING INTERNATIONAL LLC, (hereinafter “MGSI”) a State of Florida Limited Liability Company formed on 04/23/09, having its principal place of business at 1420 Sunningdale Lane, Ormond Beach, FL 32174. (Exhibit B to Answer).

2. MGSI first used the mark “MISS G-STRING INTERNATIONAL” in commerce on 04/29/09 and filed an application to register the mark “MISS G-STRING INTERNATIONAL” with the USPTO on 06/05/09. (Exhibit C to Answer).

3. Opposer is THE WORLDS PAGEANTS, LLC, (hereafter TWP) a State of Florida Limited Liability Company formed on 05/05/09, having its principal place of business at 1005 Mabbette Street, Kissimmee, FL 34741. (Exhibit D to Answer).

4. A search of THE WORLDS PAGEANTS, LLC with the State of Florida Department of State, Division of Corporations, listed John Witges of 1005 Mabbette Street, Kissimmee, FL 34741 as the “Managing Member”. (Exhibit D to Answer).

5. The State of Florida Department of State, Division of Corporations listed TWP as “Inactive, Admin Dissolution for Annual Report,” filed on 09/24/10. (Exhibit D to Answer).

6. TWP was not the registered owner of the mark “MISS NUDE INTERNATIONAL” but, in the Notice of Opposition, it attests that it is the assignee of the mark. (Exhibit E to Answer / Page 2, Paragraph 2,).

7. R&D PROMOTIONS, INC. (hereinafter “RDP”), a Florida Corporation, was the registered owner of the mark “MISS NUDE INTERNATIONAL” with the U.S. Registration No. 2,037,202. (Exhibit F to Answer).

8. RDP was formed on 12/04/00 and lists Gracinda Cardoso of 1473 Heather Way, Kissimmee, FL 34744 as President. (Exhibit F to Answer).

9. Attorney Thomas T. Aquilla was the Attorney of Record for both RDP & TWP. (Exhibits E, G, H, I, and J to Answer).

10. The State of Florida Department of State, Division of Corporations lists RDP as “Inactive, Admin Dissolution for Annual Report,” filed on 09/16/05. (Exhibit F to Answer).

11. RDP omitted to disclose to the USPTO that RDP was not a legal entity, and had not been a recognized legal entity since September 16, **2005**. (Exhibit F to Answer).

12. RDP omitted to disclose to the USPTO that RDP was not a legal entity and had not been a recognized legal entity since September 16, **2005**, at the time the USPTO renewed the mark “MISS NUDE INTERNATIONAL” on 04/16/07. (Exhibit G to Answer).

13. RDP filing for the first renewal of the mark “MISS NUDE INTERNATIONAL” with U.S. Registration Number 2037202 with the USPTO is asserted as being invalid, since

the holder of the mark was a corporation not in lawful existence when renewal was effected. (Exhibit G to Answer).

14. On this basis, it was respectfully asserted that RDP abandoned the mark "MISS NUDE INTERNATIONAL" on 09/16/05. (Exhibit G).

15. On this basis, it was respectfully asserted that RDP could not transfer or assign the mark "MISS NUDE INTERNATIONAL" to TWP after its date of dissolution by the State of Florida, Division of Corporations on 09/16/05. (Exhibit G to Answer).

16. On this basis, it was respectfully asserted that the alleged assignee TWP does not have standing to oppose the mark "MISS G-STRING INTERNATIONAL" since TWP does not have a valid assignment of the mark "MISS NUDE INTERNATIONAL" as TWP was not formed until 05/05/09, (Exhibit D), long after the administrative dissolution of RDP on 04/16/07. (Exhibit G to Answer).

17. On this basis, it was respectfully asserted that TWP cannot register a valid assignment of the mark "MISS NUDE INTERNATIONAL" with the USPTO, as RDP constructively abandoned the mark on 09/16/05. (Exhibit G to Answer).

18. On this basis, it was respectfully asserted that TWP is not a legal entity now (Exhibit D), nor was it a legal entity at the time it filed the first (1/6/11) second (2/3/11) and third (4/4/11) extensions of time to oppose and its Notice of Opposition. (Exhibits H, I, and J to Answer).

19. On this basis, it was respectfully asserted that TWP and its Attorney Thomas T. Aquilla filed their NOTICE OF OPPOSITION with malice of forethought by attesting to an invalid assignment of mark, U.S. Registration No. 2,03,202. (Exhibit G).

20. MGSI first used the mark "MISS G-STRING INTERNATIONAL" in commerce on 04/29/09. (Exhibit B to Answer).

21. TWP first used the mark "MISS NUDE INTERNATIONAL" in commerce not earlier than 05/05/09, the date that TWP registered with the State of Florida Department of State, Division of Corporations. (Exhibit D to Answer).

22. MGSI has Prior Use of the mark "MISS G-STRING INTERNATIONAL," occurring before any use asserted by TWP for the use of "MISS NUDE INTERNATIONAL." (See Exhibits B and D to Answer).

23. Attorney Thomas T. Aquilla is the Attorney of Record for TWP. (Exhibits E, G, H,I, and J to Answer).

24. Attorney Thomas T. Aquilla's address is 221 Coe Hill Road, Center Harbor, NH 03226. (Exhibits E, G, H,I, and J to Answer).

25. Attorney Thomas T. Aquilla was suspended from the practice of law in New Hampshire on 01/06/11 and reinstated April 26, 2011. (Exhibit K to Answer).

26. On this basis, it was respectfully asserted that Thomas T. Aquilla was not lawfully authorized or licensed by the New Hampshire Bar Association to act as an attorney when he filed first (1/6/11), second (2/3/11), and third (4/4/11) extensions of time to oppose (Exhibits H, I, and J), having not been reinstated until 04/26/11. (Exhibit K to Answer).

31. Based on the foregoing procedural defects, it is asserted as a full and complete affirmative defense that the corporate entities asserting opposition to the "MISS G-STRING INTERNATIONAL" are defective because of the timing of their creation and dissolution, as well as having been represented by a suspended attorney.

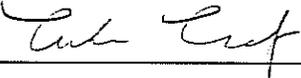
Responses to Interrogatories No 51 through 60:

See response to number 50.

Response to Interrogatory Number 61:

All interrogatory answers were prepared by Applicant representative, William Eadie, and Counsel for Applicant, Luke Lirot, Esq,

Respectfully Submitted:

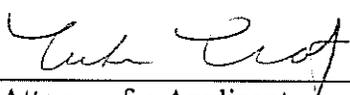
By  Dated: January 10, 2014

Luke Lirot, Esquire
Florida Bar Number 714836
LUKE CHARLES LIROT, P.A.
2240 Belleair Road, Suite 190
Clearwater, Florida 33764
Telephone:(727) 536-2100
Facsimile: (727) 536-2110
Attorney for the Applicant

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing APPLICANT MISS G-STRING INTERNATIONAL, LLC'S RESPONSE TO OPPOSER THE WORLD PAGEANTS, LLC'S FIRST SET OF INTERROGATORIES has been served on Thomas T. Aquilla, Esq., as domestic representative of The Worlds Pageants, LLC, and Camilla productions, Ltd., by mailing said copy on January 10, 2014, via First Class Mail, postage prepaid to:

Thomas T. Aquilla, Esq.
221 Coe Hill Road
Center Harbor, New Hampshire 03226


Attorney for Applicant
Signed January 10, 2014

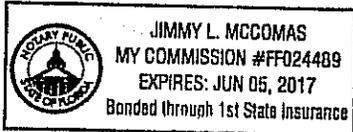
State of Florida)
County of Volusia)

William Eadie
William Eadie

January 9, 2014
Date

The foregoing instrument was sworn to and subscribed before me this 9th day of January, 2014, by William Eadie, who is personally known to me ~~or has produced~~ ~~as identification,~~ ~~did~~ did not take an oath, and who swears that the forgoing answers to Opposer's First Set of Interrogatories are true and correct.

Jimmy L. McComas Jr.
Notary Public, State of Florida



Printed name of notary: JIMMY L. MCCOMAS, JR.

My commission expires: JUNE 5, 2017

My commission number is: FF 024489

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

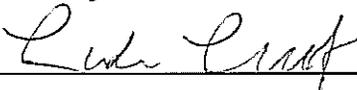
THE WORLDS PAGEANTS, LLC and)	Opposition No. 91,200,183
Camilla Productions, Ltd.)	
)	
Opposer,)	For: "MISS G-STRING
)	INTERNATIONAL"
v.)	
)	
MISS G-STRING INTERNATIONAL, LLC)	Serial No. 77/753,000
)	Published: December 7, 2010
Applicant.)	

**COMMISSIONER OF TRADEMARKS
UNITED STATES PATENT AND TRADEMARK OFFICE
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451**

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

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, and 37 C.F.R. Section 2.120 MISS G-STRING INTERNATIONAL, LLC, a Florida Corporation, ("APPLICANT"), by and through their Attorney, Luke Lirot, hereby gives notice of the filing of the *Applicant Miss G-string International, LLC's Response To Opposer The World Pageants, LLC's First Set Of Requests For Production of Documents and Things*, dated and filed September 24, 2011, by Attorney Thomas Aquilla ("AQUILLA"), representing The Worlds Pageants, LLC ("OPPOSER").

Respectfully Submitted:

By 

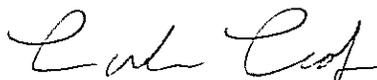
Dated: January 10, 2014

Luke Lirot, Esquire
Florida Bar Number 714836
LUKE CHARLES LIROT, P.A.
2240 Belleair Road, Suite 190
Clearwater, Florida 33764
Telephone: (727) 536-2100
Facsimile: (727) 536-2110
Attorney for the Applicant

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing APPLICANT MISS G-STRING INTERNATIONAL, LLC'S RESPONSE TO OPPOSER THE WORLD PAGEANTS, LLC'S FIRST SET OF REQUESTS FOR DOCUMENTS AND THINGS has been served on Thomas T. Aquilla, Esq., as domestic representative of The Worlds Pageants, LLC, and Camilla Productions, Ltd., by mailing said copy on January 10, 2014, via First Class Mail, postage prepaid to:

Thomas T. Aquilla, Esq.
221 Coe Hill Road
Center Harbor, New Hampshire 03226


Attorney for Applicant
Signed January 10, 2014

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

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

**COMMISSIONER OF TRADEMARKS
UNITED STATES PATENT AND TRADEMARK OFFICE
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451**

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

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, and 37 C.F.R. Section 2.120 MISS G-STRING INTERNATIONAL, LLC, a Florida Corporation, ("APPLICANT"), by and through their Attorney, Luke Lirot, respectfully submits this *Response To Opposer The World Pageants, LLC's First Set Of Requests For Production of Documents and Things*, dated and filed September 24, 2011, by Attorney Thomas Aquilla ("AQUILLA"), representing The Worlds Pageants, LLC ("OPPOSER").

RESPONSES

Response to Request No. 1:

The documents available relating to Applicant's selection and adoption of the MISS G-STRING INTERNATIONAL mark is listed as Exhibit A in APPLICANT'S ANSWER TO OPPOSER'S NOTICE OF OPPOSITION on July 19, 2011. This exhibit list 73 registered marks using the

terms “MISS” AND “INTERNATIONAL”, as listed on the USPTO trademark Electronic Search Systems (TESS).

Applicant chose a design mark which would identify Applicant’s beauty contests from all others with specificity by integrating into the design and requiring that every contestant be attired in a specific article of clothing, a women’s G-string undergarment, to reduce any possibility of confusion of its beauty pageants with any other beauty contest.

Response to Request No. 2:

No documents relating to the MISS G-STRING INTERNATIONAL mark are available other than its application for registration with the USPTO, as applicant has no other marks registered or pending.

Response to Request No. 3:

No documents are available other those described in Response to Request No. 1, as no other trademark search reports, studies or investigation relating or referring to the MISS G-STRING INTERNATIONAL mark were performed by or on behalf of Applicant.

Response to Request No. 4:

Applicant has sold no products under the MISS G-STRING INTERNATIONAL mark. Applicant’s print advertisements and stage scrim and backdrops for beauty contests using Applicant’s MISS G-STRING INTERNATIONAL mark are attached as Exhibits A-F and Exhibit J. Applicant has provided limited use of the mark to its beauty contest venues for their own advertising purpose. Applicant has no records of actual use by the venues.

Response to Request No. 5:

No documents are available as no agreement, assignment, consent authorization, permission or license have been made between Applicant and any other entity, or made on Applicant’s behalf, to use the MISS G-STRING INTERNATIONAL mark other than described in Response to Request No. 4.

Response to Request No. 6:

No documents relating to use of the MISS G-STRING INTERNATIONAL mark are available as no surveys were conducted.

Response to Request No. 7:

Applicant has not sold nor intends to sell products under Applicant’s mark. No documents are available related to studies that relate to any issue in this proceeding relating to the services of beauty contests. Applicant has offered or intends to offer using the mark, as no studies have been performed.

Response to Request No. 8:

Applicant has not sold nor intends to sell products under Applicant's mark. No documents are available for business or marketing plans related to beauty pageant services, Applicant sells or plans to sell, using the MISS G-STRING INTERNATIONAL mark, as no business or marketing plans have been produced.

Response to Request No. 9:

Applicant has not sold nor intends to sell goods under Applicant's mark. Applicant has offered its beauty contests at Paradise Lakes Resort, Rick's Cabaret and Rick's Sporting Saloon, The Broken Spoke Saloon, Destination Daytona and the Boot Hill Saloon.

No documents are available related to the identity of all classes of persons to whom Applicant intends to offer its beauty contest services using the MISS G-STRING INTERNATIONAL mark as no documents exist.

Response to Request No. 10:

Applicant has attached the invoice in the amount of \$2,500 for a print advertisement in *Bikers Pocket Guide* as shown as Exhibit C and supported by Exhibit G & H. Applicant does not anticipate future advertising and promotional expenditures as this will become the responsibility of the host venue.

Response to Request No. 11:

No documents are available as no television and radio advertisement have been produced.

Response to Request No. 12:

Applicant's print advertisement, identified as Exhibit A, was published at no cost to Applicant in FULL THROTTLE magazine, February 2012, issue.

Applicant's print advertisement, identified as Exhibit B, was published at no cost to Applicant in BIKER'S POCKET GUIDE magazine, Volume 18, Issue 1, for February 2012.

Applicant's print advertisement, identified as Exhibit C, was published at no cost to Applicant in FULL THROTTLE magazine, September and October 2012, issues.

Applicant's print advertisement, identified as Exhibit C, was published in BIKER'S POCKET GUIDE magazine, Volume 18, Issue 4, for October 2012.

Response to Request No. 13:

Applicant received media coverage from PLAYBOY.COM for its event at Paradise Lakes Resorts in Lutz, Florida held in October of 2009 by PLAYBOY, attached as Exhibits I & J.

Applicant also received media coverage from PLAYBOY.COM for its event held at Rick's Cabaret and Rick's Sporting Saloon in New Orleans, Louisiana in March of 2010 by PLAYBOY, attached as Exhibit K.

Applicant received media coverage from EASYRIDERS magazine for its event at Destination Daytona in Ormond Beach, Florida held in October of 2009, attached as Exhibits L & M.

Applicant received media coverage from IN THE WIND magazine for its event at Destination Daytona in Ormond Beach, Florida held in October of 2009, attached as Exhibit N

Response to Request No. 14:

Applicant has sold no goods using the MISS G-STRING INTERNATIONAL mark.

Applicant's received no payment for beauty contest services offered using the MISS G-STRING INTERNATIONAL mark for years 2009-2011 inclusive.

Applicant received payment in the amount of \$6,000 for the year 2012 from Destination Daytona located in Ormond Beach, Florida for beauty pageant services provided using the MISS G-STRING INTERNATIONAL mark, attached as Exhibit O.

Applicant received payment in the amount of \$3,500 for the year 2013 from the Boot Hill Saloon located in Daytona Beach, Florida for beauty pageant services provided using the MISS G-STRING INTERNATIONAL mark, attached as Exhibit P.

Applicant has no future sales projections available at this time.

Response to Request No. 15:

Unknown at this time.

Response to Request No. 16:

Applicant has not sold nor intends to sell goods under Applicant's mark.

The MISS G-STRING INTERNATIONAL mark was used at Paradise Lakes Resort in Lutz, Florida on October 1, 2009. Approximately 300 people were in attendance. Media coverage was by PLAYBOY. William Eadie was in charge of organizing the event.

The MISS G-STRING INTERNATIONAL mark was next used at Rick's Cabaret and Rick's Sporting Saloon on March 4, 2010, in New Orleans, Louisiana. Approximately 750 people were in attendance. Media Coverage was by PLAYBOY. William Eadie was in charge of organizing the event.

The MISS G-STRING INTERNATIONAL mark was next used at Rick's Cabaret and Rick's Sporting Saloon on February 8, 2011, in New Orleans, Louisiana. Approximately 750 people were in attendance. Media Coverage was by PLAYBOY.

The MISS G-STRING INTERNATIONAL mark was next used at The Broken Spoke Saloon on March 15, 2012, in Ormond Beach, Florida. Approximately 4,000 people were in attendance. Media Coverage was by various trade magazines. William Eadie was in charge of organizing the event.

The MISS G-STRING INTERNATIONAL mark was next used by at The Coca Cola Pavilion at Destination Daytona on October 18, 2012, in Ormond Beach, Florida. Approximately 1,000 people were in attendance. Media Coverage was by various trade magazines. William Eadie was in charge of organizing the event.

The MISS G-STRING INTERNATIONAL mark was next used at The Boot Hill Saloon on October 18, 2013, in Daytona Beach, Florida. Approximately 1,000 people were in attendance.

Applicant use of the MISS G-STRING INTERNATIONAL mark is further explain in Response to Requests No. 12 and 13.

Response to Request No. 17:

Applicant has not sold nor intends to sell goods under Applicant's mark. No documents are available which contain or refer to communications to or from consumers and/or potential consumers regarding or referring to the MISS G-STRING INTERNATIONAL mark, as none exist.

Response to Request No. 18:

Applicant's contention that the MISS G-STRING INTERNATIONAL mark has become distinctive of Applicants services of beauty contests is illustrated by reference to Response to Request No. 13.

Response to Request No. 19:

All documents in support of Affirmative Defenses in Applicant's Answer to Opposer's Notice of Opposition have been provided to counsel in prior pleadings and filings.

Response to Request No. 20:

Applicant's first use of the MISS G-STRING INTERNATIONAL mark for the service of conducting beauty contest on 04/29/09 in the form of advertising by Paradise Lakes Resort. Applicant does not have records of the advertisements produced by the host venue, as Applicant merely provided the limited use of the mark for their advertisements of the upcoming event.

Response to Request No. 21:

No documents are available as no changes have been made to the MISS G-STRING INTERNATIONAL mark.

Response to Request No. 22:

The MISS G-STRING INTERNATIONAL mark has had no changes.

Response to Request No. 23:

Applicant refers to Mr. Eadie's photograph of a woman wearing a G-string undergarment which was used as a graphic design element of the design mark for the MISS G-STRING INTERNATIONAL mark to identify with specificity and differentiate it from all other marks using the words "MISS" and "INTERNATIONAL", attached as Exhibit Q.

Applicant refers to a letter dated May 5, 2009 sent from the General Manager of Paradise Lakes Resorts, Christian Schrangl to Gracindo Cardoso, attached as Exhibit R.

Response to Request No. 24:

Applicant has not sold nor intends to sell goods under Applicant's mark. Applicant has and continues to use the MISS G-STRING INTERNATIONAL mark on its website, missgstring.com, has used in advertisements, stage scrim and backdrops, as listed at Response to Request No. 12 and media coverages as listed in Response to Request No. 13 and 16.

Response to Request No. 25:

Applicant has not sold nor intends to sell goods under Applicant's mark. Applicant has no documents available as Applicant has no representatives, agents, or any distribution mechanisms through which beauty contest services using the MISS G-STRING INTERNATIONAL mark are sold, have been offered or sold, or are intended to be offered or sold to consumers.

Response to Request No. 26:

Unknown at this time.

Response to Request No. 27:

Unknown at this time.

Response to Request No. 28:

Applicant has no documents available as Applicant has no knowledge of Opposer's purported use of any marks using the words "MISS" or "NUDE."

Response to Request No. 29:

Applicant has no documents available as Applicant has no knowledge of Opposer's purported use of the MISS NUDE INTERNATIONAL mark other than those documents filed by Applicant with the USPTO.

Response to Request No. 30:

No documents are available as Applicant has sold no products. No documents and tangible things are available as no 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.

Response to Request No. 31:

No documents and things are available as Applicant has had no conflict, dispute or litigation involving the MISS-G STRING INTERNATIONAL mark.

Response to Request No. 32:

No documents are available relating to any investigation conducted as to any likelihood of confusion between the MISS G-STRING INTERNATIONAL mark and the MISS NUDE INTERNATIONAL mark was performed, as no investigations have been conducted nor does any confusion exist.

Response to Request No. 33:

No documents are available as Applicant has sold no products and has had no complaints or dissatisfaction with the services offered under the MISS G-STRING INTERNATIONAL mark.

Response to Request No. 34:

Applicant's initial awareness occurred in early May, 2009. Applicant was informed that Gracinda Cardoso telephoned Paradise Lakes Resort, accusing the resort of using photographs of models without her consent in their webpage advertisement for the upcoming Miss G-string International Pageant. She further alleged that they had infringement upon her trademark, MISS NUDE INTERNATIONAL, and threatened to terminate the event.

William Eadie was contacted by Christian Schrangl, General Manager of Paradise Lakes Resort, the next day. Mr. Eadie was asked to contact Ms. Cardoso, which he did. He informed Ms. Cardoso that the photographs she alleged were used without her consent were, in fact, photographed by Mr. Eadie and that he owned the copyright for the images, to which she held no claim. She immediately conceded to Mr. Eadie's copyrights.

On May 5, 2009, Mr. Schrangl e-mailed and mailed via USPS a letter informing her that her allegations of unauthorized use of Mr. Eadie's intellectual property "*are false and without foundation.*"

Mr. Schrangl further directed Ms. Cardoso to contact Applicant's Attorney, J. Benton Stewart II, Esquire to address any alleged infringement upon her trademark, that her threats to terminate this promotion will not be tolerated, to have no further contact with Paradise Lakes Resort under any circumstances, and notified her in writing that "*If you elect to make any contact with Paradise Lakes Resort in any manner, we and the promoter will immediately file a civil action against you for tortious interference with an ongoing contractual relationship and pursue all remedies available to us under the law.*", attached as Exhibit R.

Response to Request No. 35:

No documents are available as Applicant has no licensees, and has no other documents available relating to communications between Applicant and any third party other than those documents filed or referenced by Applicant with the USPTO.

Response to Request No. 36:

Applicant has no documents available as it has never objected in any way to a third party's use, registration or application for registration of a mark, product name or designation claiming is was confusingly similar to the MISS G-STRING INTERNATIONAL mark.

Response to Request No. 37:

No documents are available as Applicant has no instances in which a third party has objected in any way to Applicant's use, registration or application for registration of the MISS G-STRING INTERNATIONAL mark, other than Opposer.

Response to Request No. 38:

Applicant has no documents and things available as it has no knowledge of any issue of actual or possible confusion between Opposer and Applicant, other than Opposer.

Response to Request No. 39:

No documents and things are available as Applicant has sold no products under the MISS G-STRING INTERNATIONAL mark.

No incidents involving persons inquiring about or requesting services under or in connection with the MISS NUDE INTERNATIONAL mark where there is any indication that such persons were confused or mistaken about the source of such services or any possible relationship between Opposer and Applicant exist.

Response to Request No. 40:

The MISS G-STRING INTERNATIONAL mark was used at Paradise Lakes Resort in Lutz, Florida on October 1, 2009. Approximately 300 people were in attendance.

The MISS G-STRING INTERNATIONAL mark was next used at Rick's Cabaret and Rick's Sporting Saloon on March 4, 2010, in New Orleans, Louisiana. Approximately 750 people were in attendance.

The MISS G-STRING INTERNATIONAL mark was next used at Rick's Cabaret and Rick's Sporting Saloon on February 8, 2011, in New Orleans, Louisiana. Approximately 750 people were in attendance.

The MISS G-STRING INTERNATIONAL mark was next used at The Broken Spoke Saloon on March 15, 2012, in Ormond Beach, Florida. Approximately 4,000 people were in attendance.

The MISS G-STRING INTERNATIONAL mark was next used by at The Coca Cola Pavilion at Destination Daytona on October 18, 2012, in Ormond Beach, Florida. Approximately 1,000 people were in attendance.

The MISS G-STRING INTERNATIONAL mark was next used at The Boot Hill Saloon on October 18, 2013, in Daytona Beach, Florida. Approximately 1,000 people were in attendance. Please reference attached Exhibits A-C.

Response to Request No. 41:

Applicant has sold no goods under the MISS G-STRING INTERNATIONAL mark. No documents are available as Applicant did not use any email or mailing lists to promote services under the MISS G-STRING INTERNATIONAL mark.

Response to Request No. 42:

Applicant currently and has continually used the MISS G-STRING INTERNATIONAL mark since its inception on 04/29/09, with no period of abandonment.

Response to Request No. 43:

William Eadie, as an individual, is the Judgment Creditor with a valid and enforceable court order against Judgment Debtors Gracinda Cardoso, an individual, and Judgement Debtor R&D Promotions, Inc., a State of Florida corporation, for an amount greater than \$40,000.

Judgment Debtor R&D Promotions, Inc. was administratively dissolved by the Florida Department of State, Division of Corporations on 09/16/2005 and never reinstated, attached as Exhibit S.

On June 6, 2011, Judgment Creditor Eadie verified with the Florida Department of State, Division of Corporations that the name was available and registered a new corporation using R&D Promotions, Inc., which was administratively dissolve by the Florida Department of State, Division of Corporations on 09/28/12, attached as Exhibit T.

Response to Request No. 44:

William Eadie has made no filing with the Florida Department of State, Division of Corporation in the name of The World's Pageants, LLC.

Respectfully Submitted:

By 

Dated: January 10, 2014

Luke Lirot, Esquire
Florida Bar Number 714836
LUKE CHARLES LIROT, P.A.
2240 Belleair Road, Suite 190
Clearwater, Florida 33764
Telephone: (727) 536-2100
Facsimile: (727) 536-2110
Attorney for the Petitioner

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing APPLICANT MISS G-STRING INTERNATIONAL, LLC'S RESPONSE TO OPPOSER THE WORLD PAGEANTS, LLC'S FIRST SET OF REQUESTS FOR DOCUMENTS AND THINGS has been served on Thomas T. Aquilla, Esq., as domestic representative of The Worlds Pageants, LLC, and Camilla Productions, Ltd., by mailing said copy on January 10, 2014, via First Class Mail, postage prepaid to:

Thomas T. Aquilla, Esq.
221 Coe Hill Road
Center Harbor, New Hampshire 03226



Attorney for Applicant
Signed January 10, 2014

BROKEN SPOKE

SALOON

BROKEN SPOKE.COM

*Miss
G-String
International*

BIKINI CONTEST

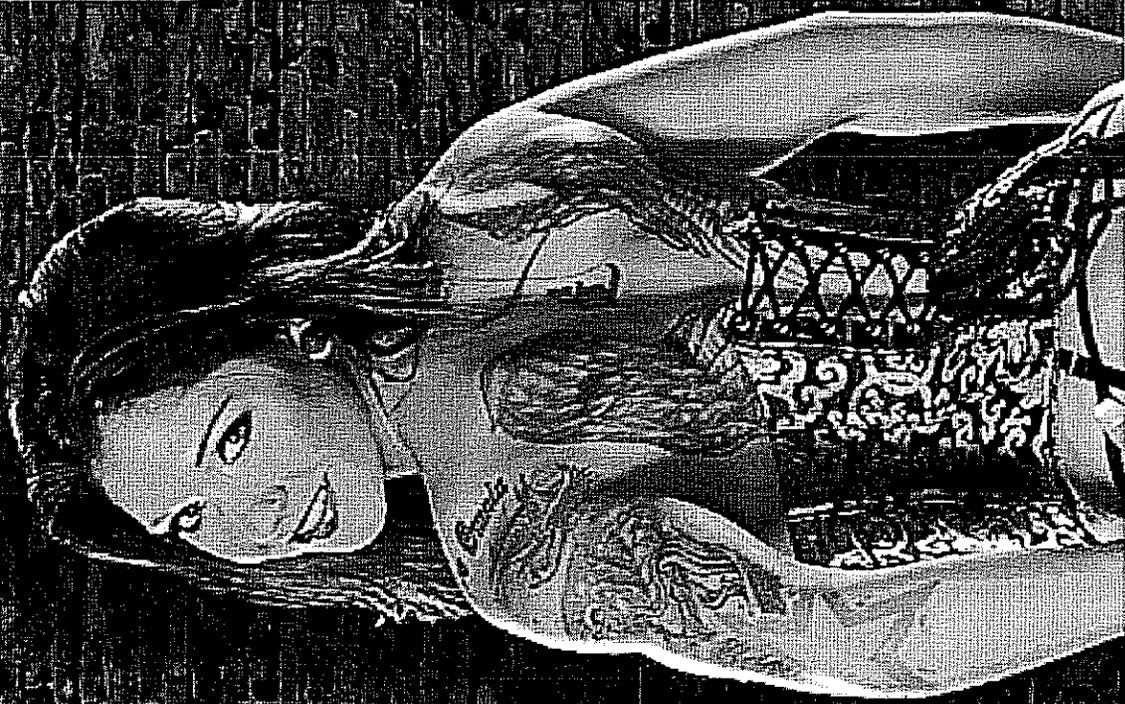
**Thursday
March 15 @ 8PM**

BIKE WEEK 2012

Exhibit "A"

BROKEN SPOKE SALOON

Miss
G-string
International™



G-STRING COMPETITION

THURSDAY • MARCH 15 • 8:00 PM

BIKEWEEK'S ONLY G-STRING BIKINI CONTEST!

NEVER SEEN BEFORE IN DAYTONA

MISSGSTRING.COM

Jägermeister

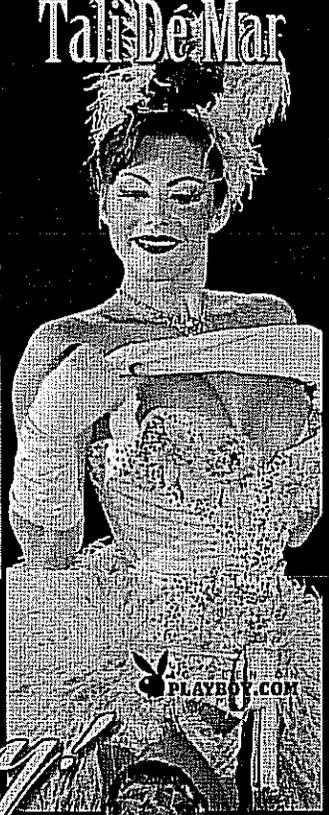
PRESENTS

THURSDAY • OCTOBER 18TH

FRIDAY • OCTOBER 19TH

HOSTED BY

FEATURING



BRUCEROSSMEYER.COM



MISSGSTRING.COM

BIKETOBERFEST'S ONLY
G-STRING CONTESTS
With **JAY ALLEN**
Master of Ceremonies

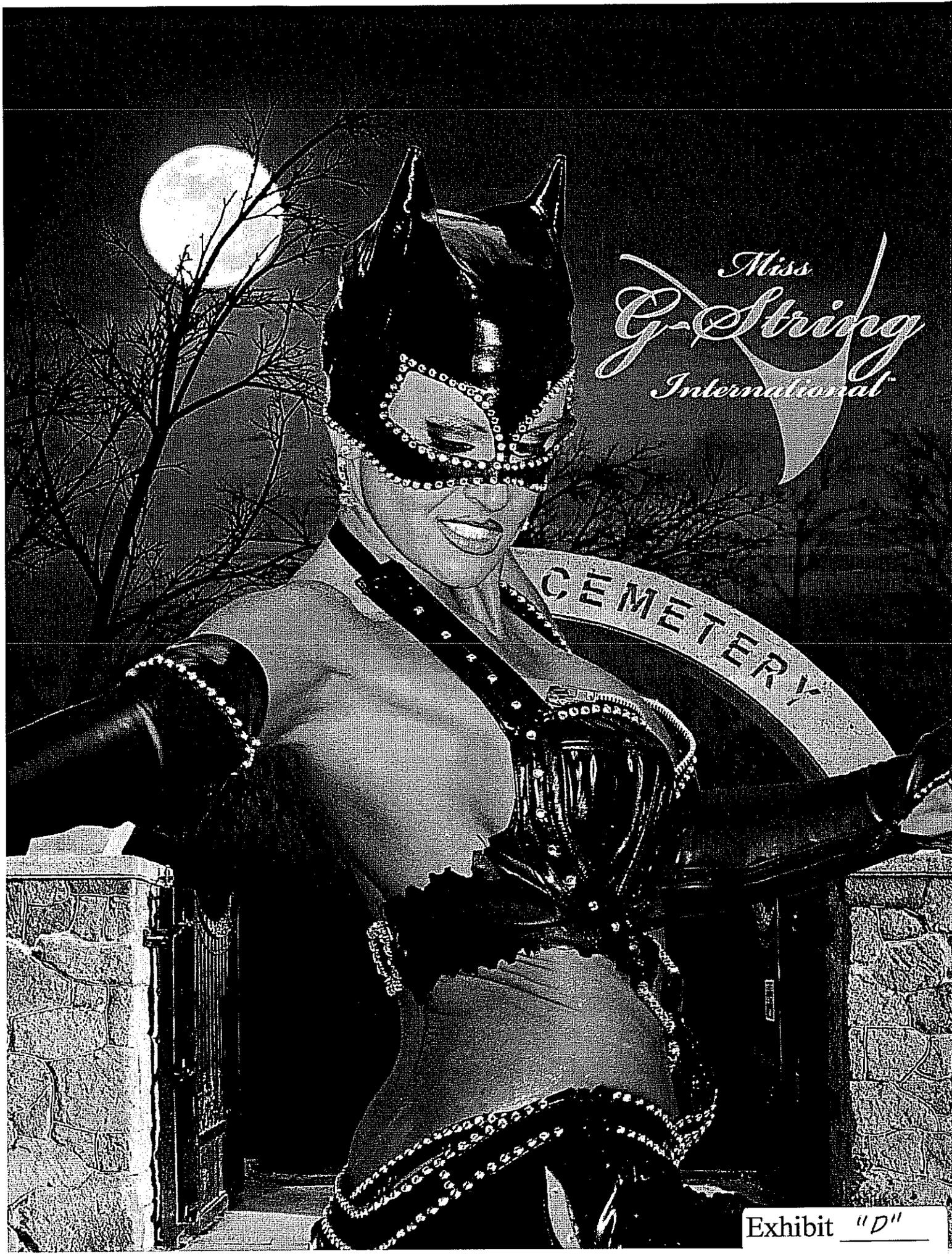


COCA-COLA PAVILION • 1637 N US HWY 1 • ORMOND BEACH, FL 32174



OCTOBER 18-19 • 8PM
AT BRUCE ROSSMEYER'S
DESTINATION DAYTONA

Exhibit "C"



*Miss
G-String
International*

CEMETERY

Exhibit "D"

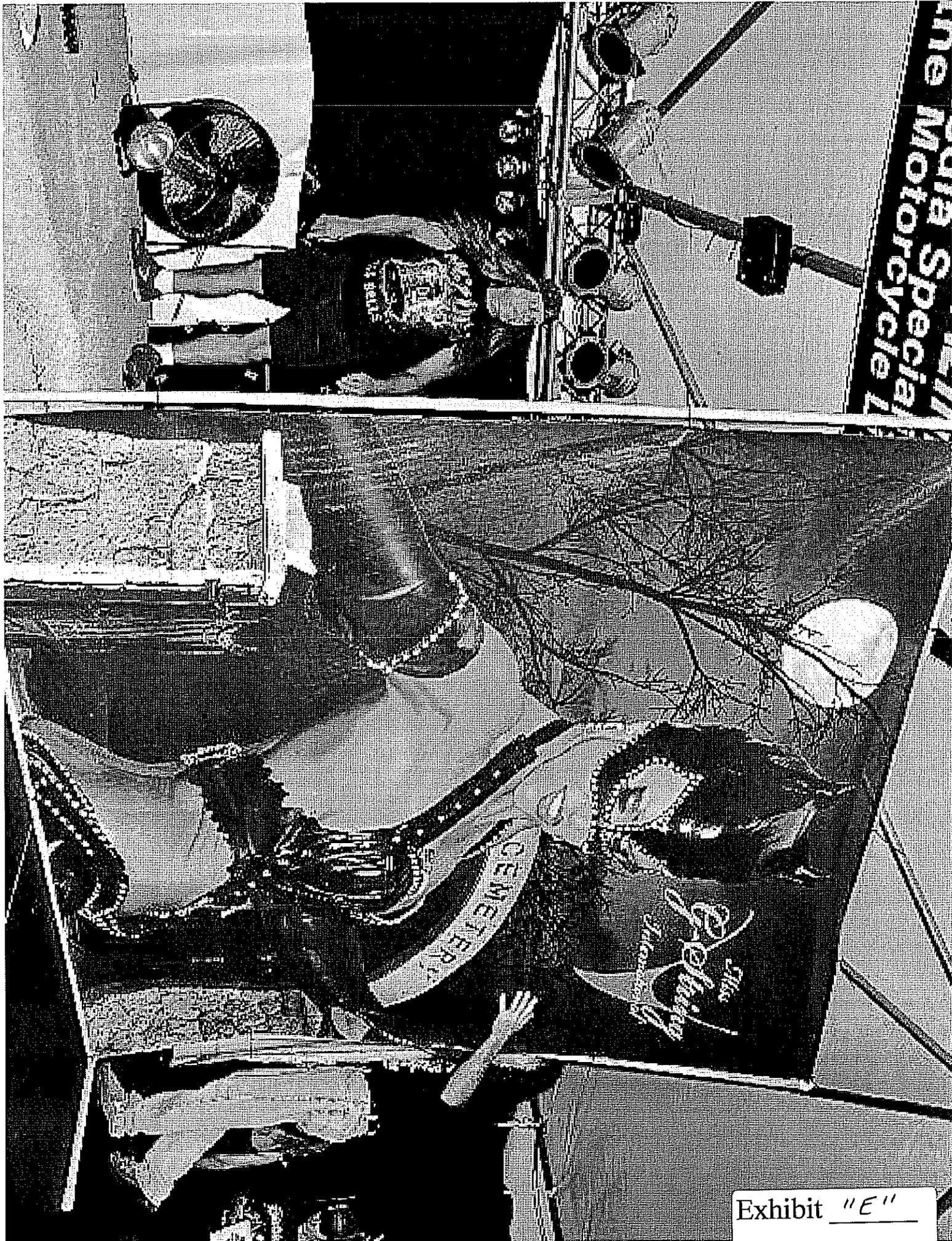


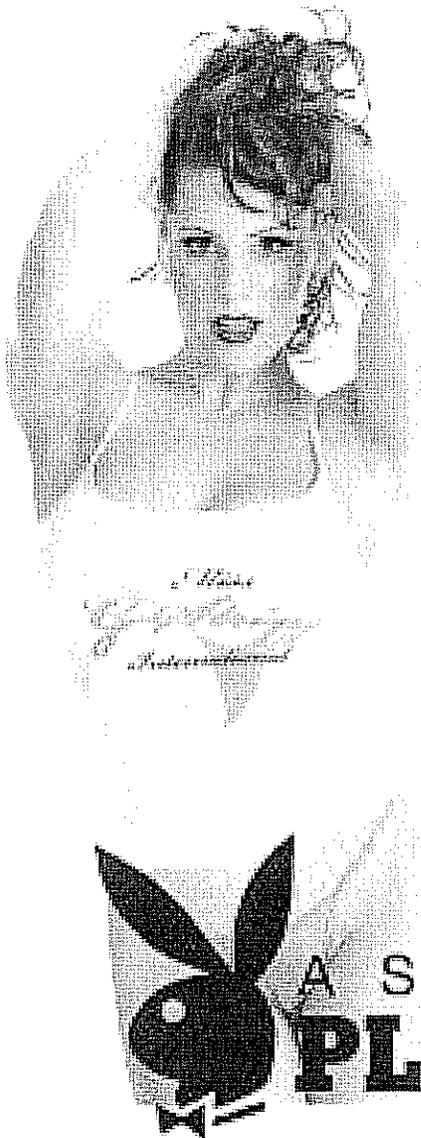
Exhibit "E"

Rick's

C A B A R E T

The Bunny is Arriving!

We'll be hosting the 2010 Miss G-String International Mardi Gras Video Shoot at both the Cabaret and the Saloon



This is your opportunity to meet James Trevenen Playboy photo editor, and Jay Boersma, Playboy Creative Director. They're always looking to discover stars in the making. It may be your turn!

Rick's

SALOON

AS SEEN ON
PLAYBOY.COM

**Request for Taxpayer
Identification Number and Certification**

Give form to the requester. Do not send to the IRS.

Print or type See Specific Instructions on page 2.	Name (as shown on your income tax return) Biker's Pocket Guide, Inc.	
	Business name, if different from above	
	Check appropriate box: <input type="checkbox"/> Individual/Sole proprietor <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> Limited liability company. Enter the tax classification (D=disregarded entity, C=corporation, P=partnership) ▶ <input type="checkbox"/> Exempt payee <input type="checkbox"/> Other (see instructions) ▶	
	Address (number, street, and apt. or suite no.) 1000 Walker Street, #379	Requester's name and address (optional) Miss G String Int'l LLC 1420 Sunningdale Lane Ormond Beach, FL 32174
	City, state, and ZIP code Holly Hills, FL 32117	List account number(s) here (optional)

Part I Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. The TIN provided must match the name given on Line 1 to avoid backup withholding. For individuals, this is your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the Part I instructions on page 3. For other entities, it is your employer identification number (EIN). If you do not have a number, see *How to get a TIN* on page 3.

Note. If the account is in more than one name, see the chart on page 4 for guidelines on whose number to enter.

Social security number
or
Employer identification number
59 3496207

Part II Certification

Under penalties of perjury, I certify that:

- The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me), and
- I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding, and
- I am a U.S. citizen or other U.S. person (defined below).

Certification Instructions. You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and generally, payments other than interest and dividends, you are not required to sign the Certification, but you must provide your correct TIN. See the instructions on page 4.

Sign Here	Signature of U.S. person ▶ <i>Ronald M. Finner</i>	Date ▶ <i>9/10/2012</i>
------------------	--	-------------------------

General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

Purpose of Form

A person who is required to file an information return with the IRS must obtain your correct taxpayer identification number (TIN) to report, for example, income paid to you, real estate transactions, mortgage interest you paid, acquisition or abandonment of secured property, cancellation of debt, or contributions you made to an IRA.

Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN to the person requesting it (the requester) and, when applicable, to:

- Certify that the TIN you are giving is correct (or you are waiting for a number to be issued),
- Certify that you are not subject to backup withholding, or
- Claim exemption from backup withholding if you are a U.S. exempt payee. If applicable, you are also certifying that as a U.S. person, your allocable share of any partnership income from a U.S. trade or business is not subject to the withholding tax on foreign partners' share of effectively connected income.

Note. If a requester gives you a form other than Form W-9 to request your TIN, you must use the requester's form if it is substantially similar to this Form W-9.

Definition of a U.S. person. For federal tax purposes, you are considered a U.S. person if you are:

- An individual who is a U.S. citizen or U.S. resident alien,
- A partnership, corporation, company, or association created or organized in the United States or under the laws of the United States,
- An estate (other than a foreign estate), or
- A domestic trust (as defined in Regulations section 301.7701-7).

Special rules for partnerships. Partnerships that conduct a trade or business in the United States are generally required to pay a withholding tax on any foreign partners' share of income from such business. Further, in certain cases where a Form W-9 has not been received, a partnership is required to presume that a partner is a foreign person, and pay the withholding tax. Therefore, if you are a U.S. person that is a partner in a partnership conducting a trade or business in the United States, provide Form W-9 to the partnership to establish your U.S. status and avoid withholding on your share of partnership income.

The person who gives Form W-9 to the partnership for purposes of establishing its U.S. status and avoiding withholding on its allocable share of net income from the partnership conducting a trade or business in the United States is in the following cases:

- The U.S. owner of a disregarded entity and not the entity,



BIKERS POCKET GUIDE, INC.
P. O. Box 265087
Daytona Beach, Florida 32126
Phone (386) 323-9955
Web: www.BikersPocketGuide.com

9/4/12

Invoice #: 092412-1

TO: Miss G String International

FOR:

2012 Daytona Beach Biketoberfest Edition - Advertising
Centerfold

	Amount	Payment Due
Daytona Beach:	\$ 2,500.00	Upon receipt
Total due:	\$ 2,500.00	

PD 9-10-2012

CK# 1144

PAID IN FULL

MAILED 9-10-2012

All invoices due upon receipt.
Thank you for your business!

Exhibit "H"

PLAYBOYBLOG.COM

THE HOTTEST PLAYBOY PLAYMATES

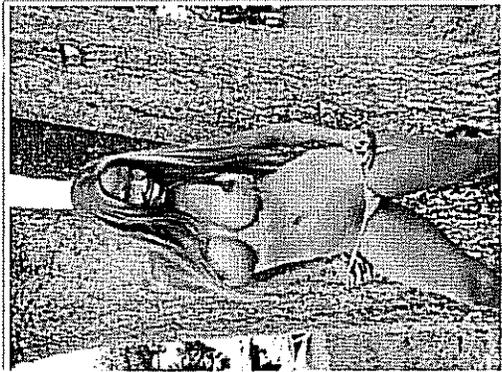
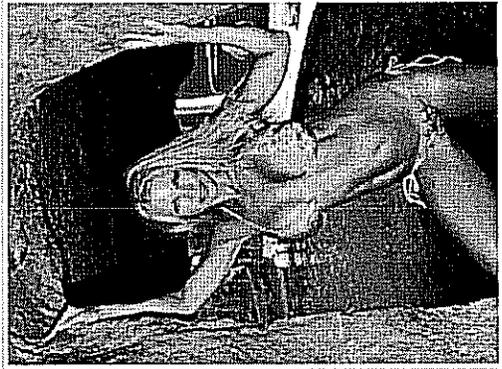
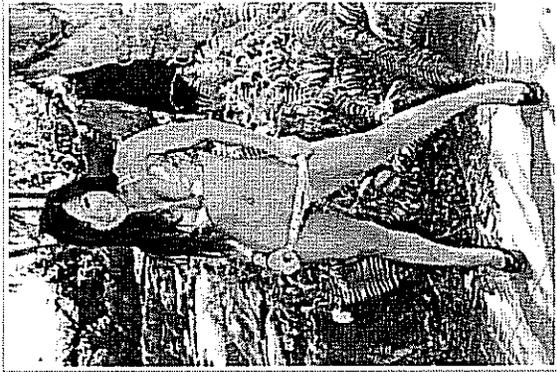


PLAYBOY PRESENTS MISS G-STRING INTERNATIONAL

Playboy Photo Editor James Trevenen took a break from photographing Playmates, Cyber Girls and Casting Call models to judge the... First Annual Miss G-String International Pageant near Tampa, Florida. While judging the competition Trevenen says he took performance, attitude and personality into consideration. "Over the course of three nights I watched each of the 17 G-string-sporting contestants strip down in a variety of different performance styles including 'sexy Elvis,' burlesque, fire twirling and gothic." Winner Tanya Taylor's circus-themed performance was energetic and ended in what Trevenen calls "an amazing hot wax shower."

Daisy Duxe was voted Miss Congeniality by her fellow contestants and Tawnie Monroe received the highest scores given to newcomers. Trevenen selected Tali De'Mar as Miss Photogenic. Her prize? A Playboy photo shoot! "Tali encompassed all that a photographer looks in a model," says Trevenen. "A unique look, fantastic body and gorgeous smile. When she was in front of the camera, she made it easy to take photos."

If you didn't attend the pageant—held, incidentally, at a clothing-optional resort—you can check out the contestants in our exclusive photo gallery.



from Playboy.com: Nigella / Miss G-String International

MISS G-STRING INTERNATIONAL

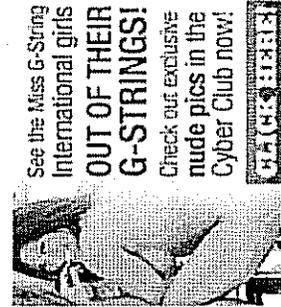


Prun Anderson
Miss February 1989

By James Trevenen

Photography by James Trevenen, Jack Watson, Todd Plinke, Bill Eadie and John Cole

There is probably no better venue to host an exotic dancer competition than a place that celebrates the unclad human body—which is why it is appropriate that the first annual Miss G-String International Pageant was held at Paradise Lakes nudist resort near Tampa, Florida. The competition took place October 1-3 and featured 17 talented dancers, all of whom performed their best striptease and exotic dance routine for a panel of judges and a very enthusiastic audience. Each girl incorporated a unique twist into her individual number, and judges were wowed with creative themes that included sexy Elvis, burlesque, fire twirling and gothic vampire.



See the Miss G-String International girls **OUT OF THEIR G-STRINGS!** Check out exclusive nude pics in the Cyber Club now!

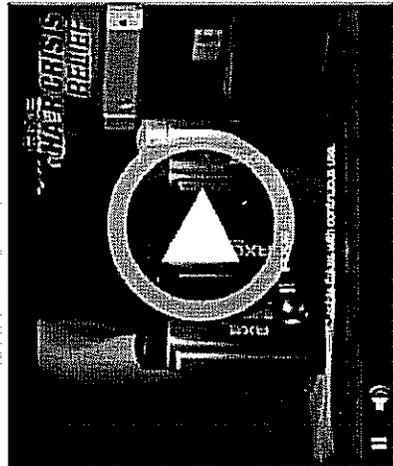


Free Tour Members Area Logout

FORUM HOMER STYLE SHOP VOD

Looking for the hottest girls in the world?

CLICK HERE



PLAYBOY'S MOST POPULAR >



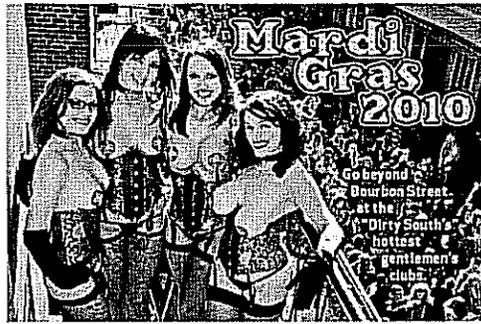
BROWSE NIGHTLIFE

- A-LIST >
- PARTY GIRL >
- THE SPOT >
- DRINKS >
- PARTY COVERAGE >
- WANDERLUST >
- BEST OF NIGHTLIFE >

MORE FROM PLAYBOY (Oct 22, 2009)

HOT AS HELL HALLOWEEN
Playboy's Jo Garcia and Suzi McCoppin slip into...





Facebook | Twitter | More...

Mardi Gras, classically one of the biggest and best all-day, all-night street parties in America, has always held a special place in our hearts. Who wouldn't enjoy meandering down the street, drink in hand, watching a sea of beautiful women who, with only modest encouragement, will do very immodest things?

This year we returned to the Big Easy with the idea that the people who know Mardi Gras best are those who work it—women whose job it is to lead the party gangs and the debauchery flowing. With the help of Miss G-String International and Rick's Cabaret we visited some of the best strip clubs on Bourbon Street and photographed many of the young women who work there as dancers, greeters, waitresses and club managers.

Mardi Gras, especially on Bourbon, can be pretty extreme with its on-your-face drinking, pervasive sexuality and keep-your-wallet-in-your-front-pocket scam artists, but beneath that lies an essential sweetness and grace that is pure New Orleans. Over the course of four days, we exhausted every location available to deliver the best views of Mardi Gras, including the rarely accessible upstairs area of Rick's newest gentlemen's club, the Sporting Saloon. These NOLA sirens generated a collection of photos that are both gritty and sexy, much like the city herself.

Above: Kristin, Kayla, Ja and Lara Abae overlooking Bourbon Street from the balcony of Rick's Sporting Saloon



VOTE *Playboy* Choose the girl you'd most like to see naked. The top vote-getter will appear in an exclusive nude image gallery that we'll email directly to you on Wednesday!

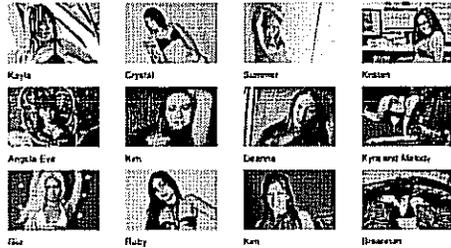


PLAYBOY'S MOST POPULAR >

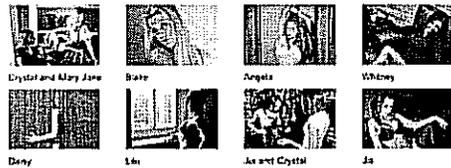
- BROWSE NIGHTLIFE
A-List
PARTY GIRL
THE CHOT
DRINKS
PARTY COVERAGE
VAGUE LIST
BEST OF NIGHTLIFE

MORE FROM PLAYBOY February 2010

- THE A-LIST: PIZZA Any and you slice it, these are the best pizza.
PLAYBOY COMMAND: SCHOOL OF FISH
PLAYBOY'S SUPER BOWL PARTY 2010 PICTURES Our Super Saturday night party returns to Miami.
PARTY GIRL: STUFFED ANIMAL FIGHT Sexy and the friends have a go!
PARTY GIRL: HOW TO HAVE AN SEX Playboy's Party Girl wants you to have sex



No heads required! SEE THESE BODIES' BODIES (PLUS MUCH MORE) IN THE CYBER CLUB! CLICK HERE!



- ALL ABOUT NIGHTLIFE
By Mike Flores
Playboy's Ultimate Guide to New Orleans
Mardi Gras: Street Food, Party and the Best of New Orleans
Party Girl: Stuffed Animal Fight
Party Girl: How to Have an Sex

PLAYBOY.COM

NEW GIRLS! See sample photos of the latest babes to get naked for Playboy Club members!

Exhibit "K"

FREE VIDEO DOWNLOAD! SEE PAGE 30!

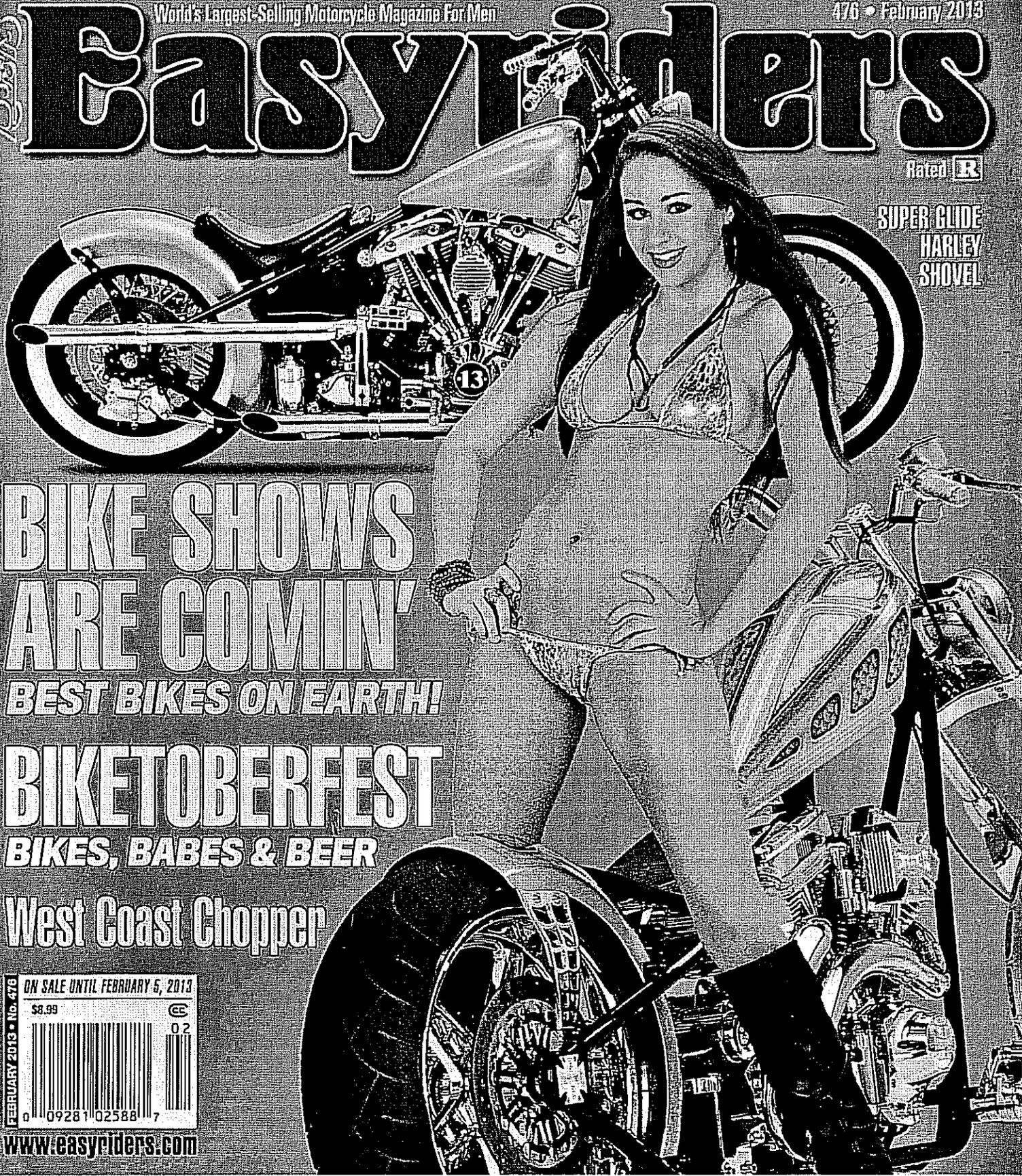
World's Largest-Selling Motorcycle Magazine For Men

476 • February 2013

Easyriders

Rated **R**

**SUPER GLIDE
HARLEY
SHOVEL**



**BIKE SHOWS
ARE COMIN'
BEST BIKES ON EARTH!**

**BIKETOBERFEST
BIKES, BABES & BEER**

West Coast Chopper

ON SALE UNTIL FEBRUARY 5, 2013

\$8.99

0 9281 02588 7

02

www.easyriders.com

Exhibit "L"

2011 BIKETOBERFEST

FRIDAY, SEPTEMBER 16TH

Can you believe that over 1000 bikers will be riding through the streets of the City of Phoenix this weekend? Whether you're a seasoned rider or a first-timer, this is the perfect time to get out on the road. The event will feature a variety of activities, including a bike show, a charity ride, and a live performance by the Phoenix Symphony. Don't miss out on this exciting event. For more information, visit www.biketoberfest.com.



Exhibit "M"

Living and loving the Harley-Davidson experience

IN THE WIND[®]



An Easyriders Magazine
JUNE 2013 • Number 153

Rated **R**

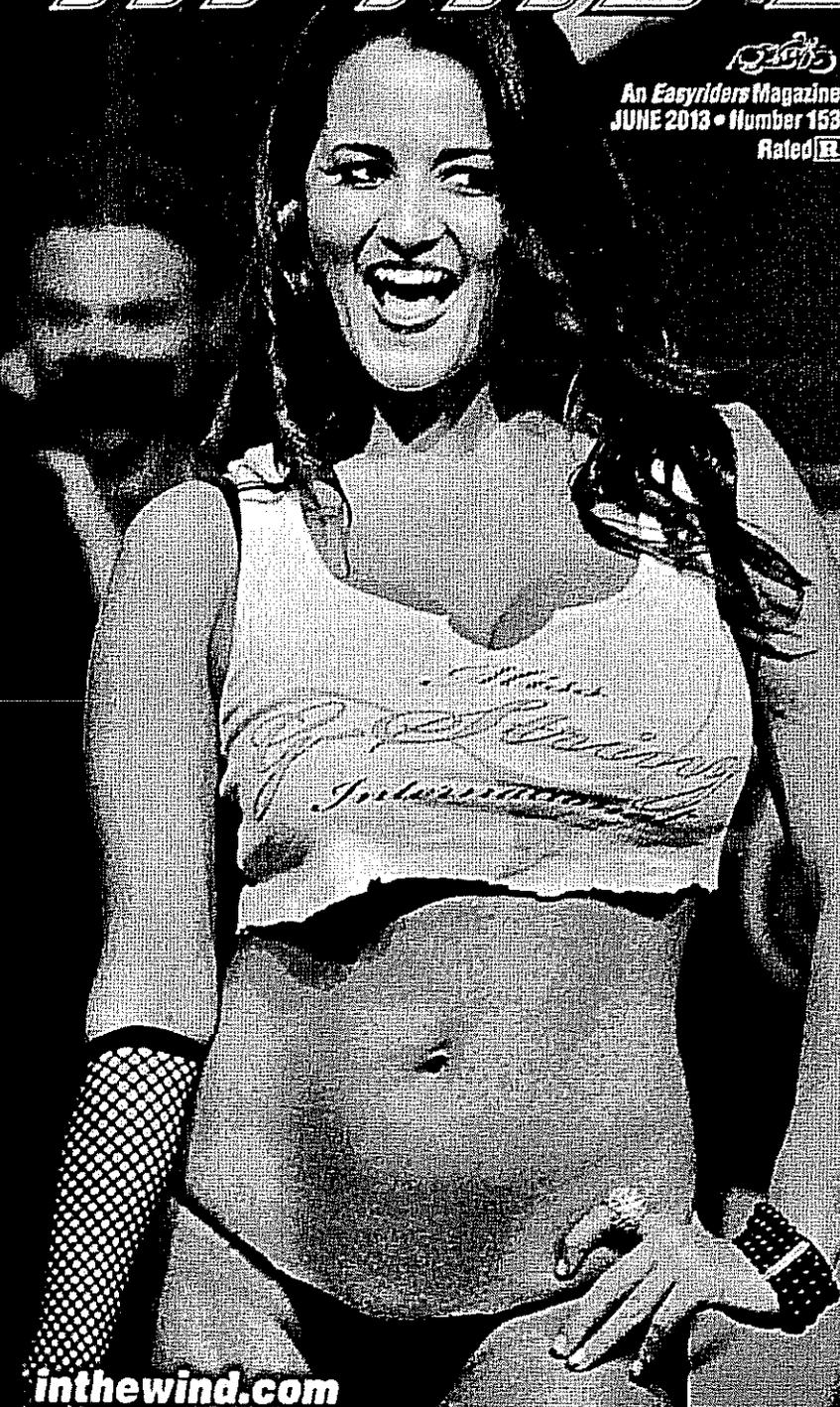
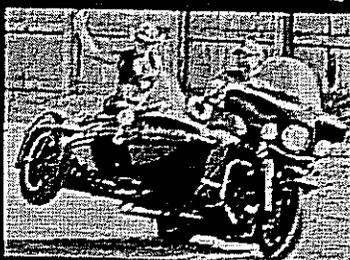


BIKETOBERFEST HALF-NAKED IN FLORIDA AGAIN EASYRIDERS RODEO TOUR

ALL THE
GRIT YOU
CAN SPIT
INSIDE!



REAL-LIVE
BABES,
BIKES &
BROS!



inthewind.com



LOVE RIDE 29

THE LEGEND
ROLLS ON

B.A.D. RIDE 15

KICKIN' BUTT
ON DIABETES

Exhibit "N"

EVENT AGREEMENT

This event agreement ("Agreement") is effective on this the 3rd day of April, 2012 (the "Effective Date") and is entered into by and between Destination Daytona, LLC, a Florida limited liability company, having a principal place of business located at 1637 N US Hwy 1, Ormond Beach, Florida 32174 (herein, "DD") and Miss G-String International LLC, a Florida limited liability company with its principal address as 1420 Sunningdale Lane, Ormond Beach, Florida 32174 (herein, "VENDOR").

RECITALS

WHEREAS, DD is a company that owns an entertainment complex known as "Destination Daytona," located on or about 1635 N US Hwy 1, Ormond Beach, FL 32174 ("the Premises") and is the owner and operator of an open air pavilion at the Premises called the Coca Cola Pavilion (the "Pavilion"); and,

WHEREAS, VENDOR owns, organizes, and conducts the "Miss G-String International Bikini & Sexy Halloween Costume Contest" to be held on Thursday, October 18, 2012 and the "Miss G-String International Sexy Lingerie Contest" to be held Friday, October 19, 2012 (hereinafter, "Event"); and,

WHEREAS, DD and VENDOR wish to enter into this Agreement to provide for VENDOR'S non-exclusive use of the Pavillion for the Event as specifically set forth in this Agreement; and,

NOW THEREFORE, for good and valuable consideration which is acknowledged and received by the parties hereto, the parties hereby agree as follows:

1. **TERM.**

(a) The term of this Agreement shall commence on the Effective Date and terminate on October 20, 2012 at noon unless responsibilities to be performed by either party extend beyond that date and if so, upon completion of the responsibilities of the parties (the "Term").

(b) If at any time during the Term, VENDOR is in material breach of this Agreement, DD shall have the option of canceling the Agreement or canceling a renewal of a Term after notifying VENDOR of the reasons for material breach (and cancellation) and the expiration of five (5) days following such notice and VENDOR's failure to cure the breach during such period. If the cancellation is due to a material breach by VENDOR (after notice and opportunity to cure as set forth herein) any event fee paid for the following event is non-refundable.

(c) A material breach of this Agreement by VENDOR (as set forth in Section 1(b)) shall be any of the following occurrences after VENDOR's receipt of notice and failure by VENDOR to cure the breach with five (5) days of receipt of such notice of breach or the failure

of VENDOR to cure any breach of the Agreement 48 HOURS prior to day of the Event: i) the non-payment (or late payment and non-acceptance by DD) of any fee due to DD pursuant to this Agreement; or, ii) the failure of VENDOR to obtain all licensing and approvals for conducting the vending activities as required in Section 2(b); or, iii) failure to provide insurance certificates as required in Section 5; iv) failure to comply with the requirements of the indemnification, hold harmless and defense requirements in Section 4, or v) otherwise perform its duties hereunder.

(d) If at any time during a Term, DD is in material breach of this Agreement, VENDOR shall have the option of canceling the Agreement after notifying DD of the reasons for material breach and cancellation and the expiration of five (5) days following such notice and DD's failure to cure the breach. If cancellation is due to a material breach of this Agreement by DD and occurs prior to any Event during the then current Term, VENDOR shall not be responsible to pay for the Event fee for the cancelled Event and DD shall refund VENDOR for any paid event fee paid for the cancelled Event.

(e) A material breach of this Agreement by DD (as set forth in Section 1(d)) shall be any of the following occurrences after VENDOR's receipt of notice and failure by VENDOR to cure the breach with five (5) days of receipt of such notice of breach or or the failure of DD to cure any breach of the Agreement 48 HOURS prior to day of the Event: i) failure to provide VENDOR with the vending space required by this Agreement, or ii) otherwise perform its duties hereunder.

2. RESPONSIBILITIES OF THE PARTIES.

(a) Subject to the terms of this Agreement, DD shall at its sole cost and expense:

(i) grant a non-exclusive license to VENDOR to utilize the Pavillion in order to conduct the Event on October 18 & 19, 2012 and shall pay VENDOR a fee in the amount of \$6000.00 ("Event Fee") as follows:

(A) the sum of \$3,000.00 to be applied against the Event Fee at the execution of this Agreement; and, (B) the sum of \$3,000.00 on or before October 17, 2012. All sums paid to VENDOR are refundable in the event that VENDOR fails to conduct the Event in accordance with this Agreement;

(ii) provide complete access to the main stage for the sole use of VENDOR commencing at 6:00 PM on both of the event nights (the events must conclude no later than 11:00 each night);

(iii) provide required light and sound company at its sole expense;

(iv) provide adjacent parking for forty (40) vehicles on both event nights;

(v) provide security as deemed appropriate by DD;



July 31, 2013

Ms. Karin Gehris
Boot Hill Saloon
501 Silver Beach
Daytona Beach, FL 32118

Re: 2013 Daytona Biketoberfest

Dear Karin,

Thank you for the opportunity to assist in your upcoming **2013 Daytona Biketoberfest** event.

We have reduced to writing what each of us would be required to do to ensure the success of the promotion.

POSTCARDS AND POSTERS:

We have provided an online printing service provider to print your postcards and posters. We grant to you the permissive use of our intellectual property photograph for this event's print and advertising purposes. Specifically, the copyright image is known as "Cat Girl" and features a model attired in a cat girl costume in front of the Pinewood Cemetery. We will be responsible to interface with the graphic designer to create the desired layout pursuant to your directives. You will be responsible for the graphic design cost associated with creating camera ready art for the print provider.

TEMPORARY TATTOOS:

We have provided an online printing source to provide temporary tattoos featuring your trademark logo. You will need to order, due to use of your trademark.

STAGE BACKGROUND SCRIMS:

We will provide for your use our Jaegarmesiter and Cat Girl scrims. You will be responsible for the restitching required on the Cat Girl scrim and the POV frames and support to which the scrims will be velcro adhered. You will also be responsible for the cost of providing the required lighting trees to backlight each scrim.

Miss
G-String
International

**Miss G-String International LLC 1420 Sunningdale Lane Ormond Beach, FL 32174
386. 492. 7878 missgstringint@aol.com**

Exhibit "P"

Boot Hill Saloon
2 of 2

MISS G-STRING CONTEST:

We will conduct a one night *Miss G-String International* contest at your Main Street venue. We will be limited to either a sexy halloween costume contest or a sexy school girl contest, due to restrictions on the wearing of a g-string undergarment by the contestants at your Main Street venue.

You will be responsible for the prize money, costumes, MC, music and any specialty lighting costs.

LOGO SPECIALTY DRINK STEMWARE:

We will provide camera ready art of the *Cat Girl* image for use on plastic specialty drink stemware. We will use our best efforts to negotiate on your behalf a liquor supplier to produce and provide these glasses at no or minimal cost to you.

CAT GIRL APPAREL:

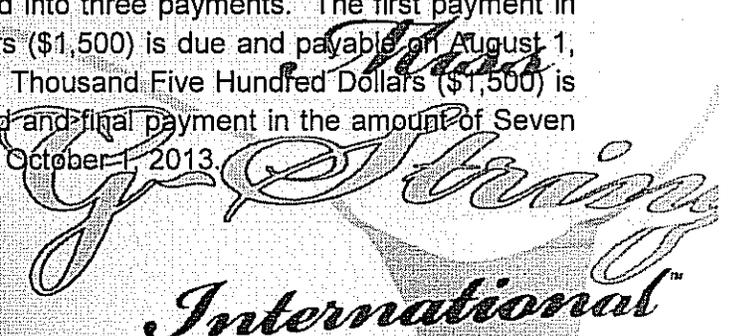
We further issue the permissive use of our *Cat Girl* copyright imagery for your use for apparel production. You will be responsible for the camera ready art cost and apparel costs.

PAYMENT TO MISS G-STRING INTERNATIONAL:

You agree to pay to Miss G-String International a sum of Three Thousand Seven Hundred and Fifty Dollars (\$3,750). The payment will be divided into three payments. The first payment in the amount of One Thousand Five Hundred Dollars (\$1,500) is due and payable on August 1, 2013. The second Payment in the amount of One Thousand Five Hundred Dollars (\$1,500) is due and payable on September 1, 2013. The third and final payment in the amount of Seven Hundred Fifty Dollars (\$750) is due and payable on October 1, 2013.

Best regards.

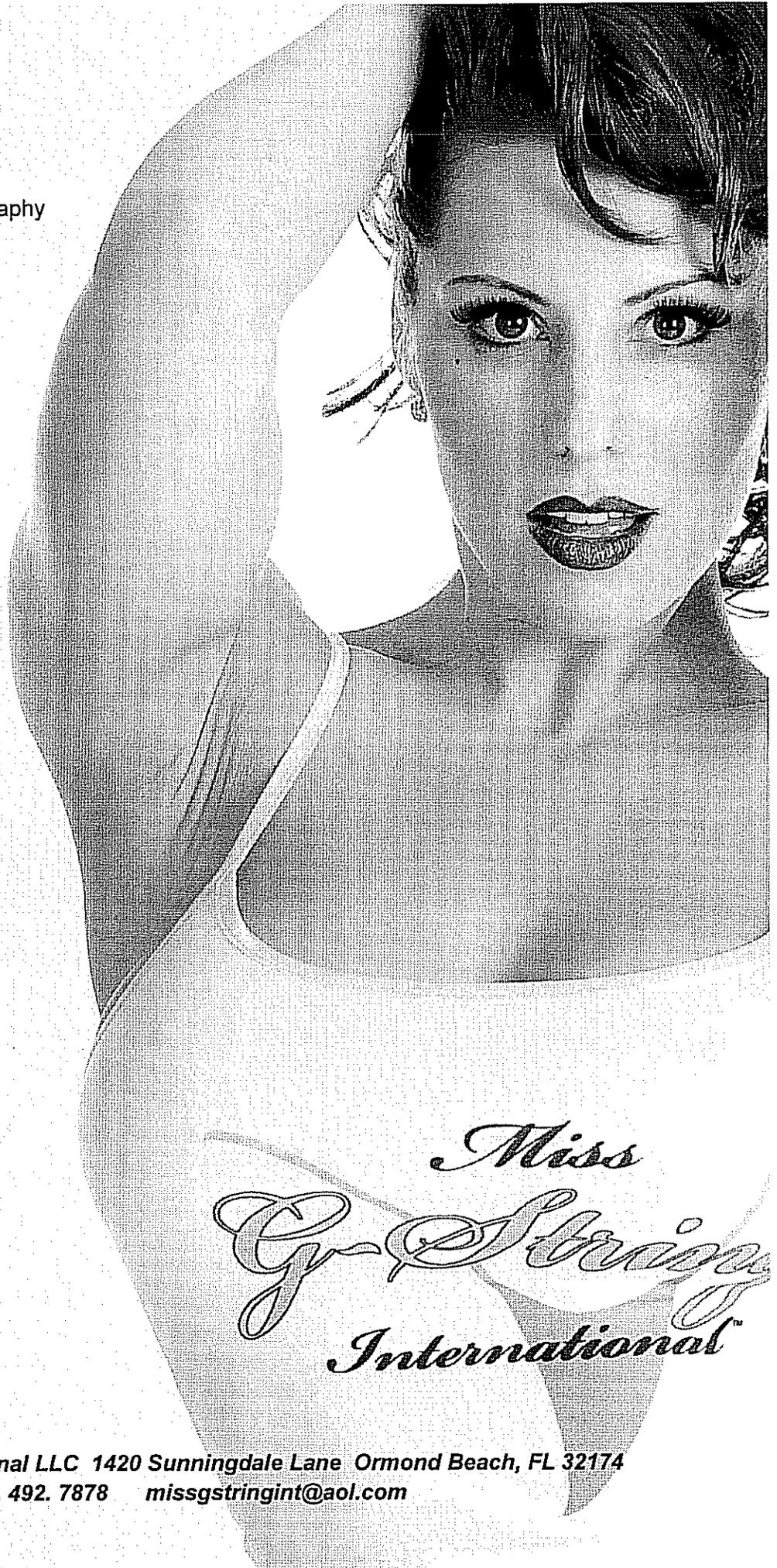
MISS G-STRING INTERNATIONAL LLC



Miss G-String International

Bill Eadie

Bill Eadie, Director of Photography
386. 492. 6443 (Office)
772. 905. 7878 (Cell)



*Miss
G-String
International*

**Miss G-String International LLC 1420 Sunningdale Lane Ormond Beach, FL 32174
386. 492. 7878 missgstringint@aol.com**

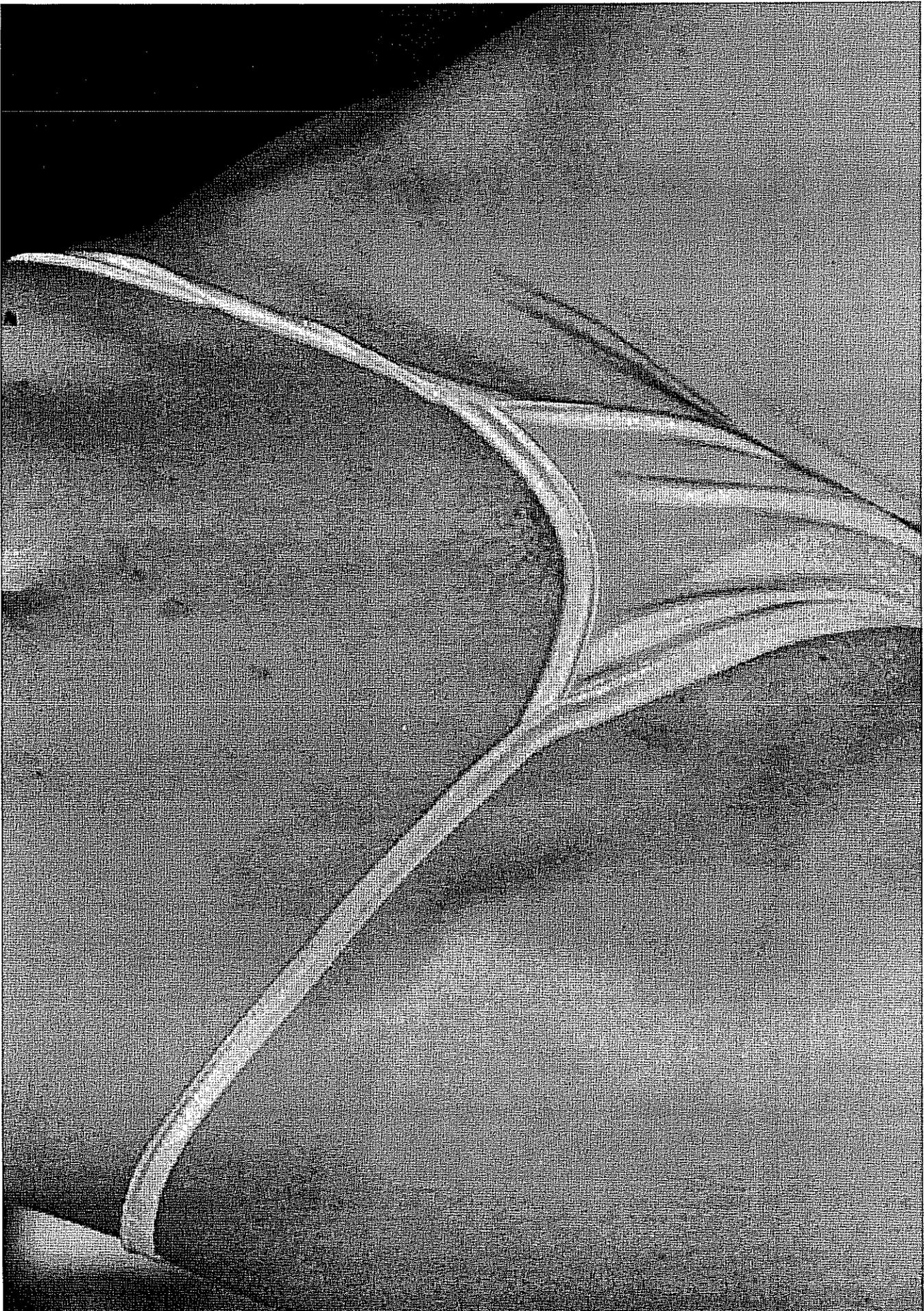


Exhibit "Q"



Paradise Lakes Resort

PO Box 750
Land O'Lakes, FL 34639
813-949-9327 866-SwimNude
www.paradiselakes.com
Fax 813-949-1008

**America's Premier
Clothing Optional Resort**

May 5, 2009

Ms. Gracinda Cardosa
1005 Mabbette
Kissimmee, FL 34741

RE: MISS G-STING INTERNATIONAL

Dear Ms. Cardosa,

Paradise Lakes Resort is the host venue of the upcoming **MISS G-STRING INTERNATIONAL PAGEANT**.

You alleged that the images used on our website to promote this event were unauthorized. As you have been noticed, from your conversation with the photographer who has certified ownership of this intellectual property, your allegations are false and without foundation.

Next, you allege an infringement upon your trademark, **MISS NUDE INTERNATIONAL**. This allegation is one which you need to address with the promoter, **MISS G-STRING INTERNATIONAL, LLC**. Please direct any and all communication of any nature to the promoter's representative at:

J. Benton Stewart II, Esq.
STEWART LAW PLLC
730 S. Sterling Avenue
Suite 304
Tampa, FL 33609

Your threats to terminate this promotion will not be tolerated.

You are hereby notified in writing to have no further contact in any form with **Paradise Lakes Resort** under any circumstances.

This will be your only notice. If you elect to make any contact with **Paradise Lakes Resort** in any manner, we and the promoter will immediately file a civil action against you for tortuous interference with an ongoing contractual relationship and pursue all remedies available to us under the law.

GOVERN YOURSELF ACCORDINGLY.

PARADISE LAKES RESORT


Christian Schrögl
General Manager

Exhibit "R"

Detail by Entity Name

Florida Profit Corporation

R & D PROMOTIONS, INC.

Filing Information

Document Number P00000112629
 FEI/EIN Number 651070494
 Date Filed 12/04/2000
 State FL
 Status INACTIVE
 Last Event ADMIN DISSOLUTION FOR ANNUAL REPORT
 Event Date Filed 09/16/2005
 Event Effective Date NONE

Principal Address

1473 HEATHER WAY
 KISSIMMEE, FL 34744

Changed: 10/01/2004

Mailing Address

1473 HEATHER WAY
 KISSIMMEE, FL 34744

Changed: 10/01/2004

Registered Agent Name & Address

CARDOSO, GRACINDA
 1473 HEATHER WAY
 KISSIMMEE, FL 34744

Name Changed: 10/01/2004

Address Changed: 10/01/2004

Officer/Director Detail

Name & Address

Title PRES

CARDOSO, GRACINDA
 1473 HEATHER WAY
 KISSIMMEE, FL 34744

Annual Reports

Report Year	Filed Date
2002	03/07/2002
2003	05/27/2003
2004	10/01/2004

Document Images

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<u>06/20/2001 -- ANNUAL REPORT</u>	View image in PDF format
<u>12/04/2000 -- Domestic Profit</u>	View image in PDF format

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<u>12/04/2000 -- Domestic Profit</u>	View image in PDF format