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

Proceeding	91201920
Party	Plaintiff Citigroup Inc.
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Date	10/22/2012
Attachments	Citigroup v. Citiair (91201920)-Amended & Supplemental Reliance Notice.pdf ( 15 pages )(1282765 bytes )

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

----- x  
CITIGROUP INC., :  
 : Serial No. 85/219,849  
 :  
 : Opposer, :  
 : Opposition No. 91201920  
 :  
 : -against- :  
 :  
 : CITIAIR, LLC, :  
 :  
 : Applicant. :  
----- x

**OPPOSER'S AMENDED AND SUPPLEMENTAL NOTICE OF RELIANCE**

Pursuant to Trademark Rules 2.120(j) and 2.122(b) and (d) through (f) of the Trademark Rules of Practice, Opposer Citigroup Inc. ("Opposer") hereby introduces into evidence the following document, in addition to the documents previously identified in (a) Exhibit A to Opposer's Notice of Reliance dated October 9, 2012 ("Exhibit A"); and (b) Opposer's Notice of Reliance – Confidential Information, dated October 9, 2012:

NOR Ex. 607: August 1, 2012 webpage, accessible at [www.eknazar.com/Alabama/ekclassifieds/showcategory.php?&keyword=citair](http://www.eknazar.com/Alabama/ekclassifieds/showcategory.php?&keyword=citair) (OPP013020).

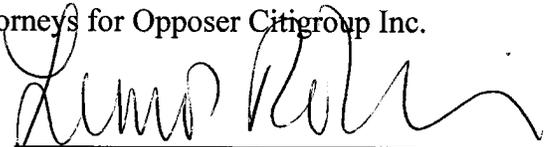
This webpage is relevant to show at least the likelihood of confusion and dilution that would result from Applicant's registration of its mark. Specifically, the document is relevant to show the similarity in relevant trade channels and target demographic, as well as the market interface between Applicant and Opposer.

Furthermore, Opposer hereby amends its Exhibit A such that "NOR Ex. vq508" is replaced by "NOR Ex. 508." Opposer's amended Exhibit A is attached hereto.

Dated: New York, New York  
October 22, 2012

Bruce Goldner  
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Attorneys for Opposer Citigroup Inc.

By:   
\_\_\_\_\_

**CERTIFICATE OF SERVICE**

I, Sylvia Marquez, hereby certify that on this 22nd day of October 2012, I caused a true and correct copy of Citigroup Inc.'s Amended and Supplemental Notice of Reliance to be served on the following person in the following manner:

**BY E-MAIL (WITHOUT ATTACHMENTS) AND FEDERAL EXPRESS**

Matthew H. Swyers, Esq.  
The Trademark Company  
344 Maple Avenue West., Suite 151  
Vienna, Virginia 22180-5612

Attorney for Applicant  
Citiair, LLC

A handwritten signature in black ink, appearing to read 'Sylvia Marquez', is written over a horizontal line.

Sylvia Marquez

**EXHIBIT A**

<b>NOR Ex. Number</b>	<b>Bates Range or Deposition Exhibit</b>	<b>Description</b>	<b>Trademark Rule</b>	<b>Relevance</b>
501	OPP001489-1502	1/5/81 – The New Yorker: “Profiles: The Money Machine” (pp41-60)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; long history of Opposer's use of CITI Marks (priority)
502	OPP001473-1488	1985 – Harvard Studies in Business History XXXVII: “Citibank 1812-1970” (Cover page, Table of Contents, Introduction)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; long history of Opposer's use of CITI Marks (priority)
503	OPP001438-1439	11/3/06 – Chicago Tribune: “Citibank sits on top in bank call center survey” (p3)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; long history of Opposer's use of CITI Marks (priority)
504	OPP001523	6/23/1912 – The New York Times: “America’s Greatest Bank is One Hundred Years Old”	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; long history of Opposer's use of CITI Marks (priority)
505	OPP001524-1529	11/16/68 – Business Week: “Why Citibank is more than a bank” (pp78-88)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; long history of Opposer's use of CITI Marks (priority)
506	OPP001803	3/1/76 – Business & Finance: “Name Change to Citibank Becomes Official Today” (pD9)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; long history of Opposer's use of CITI Marks (priority)
507	OPP004562-4575	6/8/87 – Fortune: “Citibank Wows the Consumer” (pp48-54, 200-209)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; long history of Opposer's use of CITI Marks (priority)
508	OPP004591	3/21/80 – The New York Times: “Travel Checks, Citi-Style”	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; long history of Opposer's use of CITI Marks (priority); travel-related services

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				historically offered by Opposer under CITI Marks
509	OPP005105-5114	5/29/83 – The New York Times Magazine: “Inside Citicorp: The Changing World of Banking” (pp15-20, 37, 46)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; long history of Opposer's use of CITI Marks (priority)
510	OPP004723-4726	3/20/01 - Financial Services Marketing: "Living Richly at Citibank Means There is More to Life than Money" (p12)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; long history of Opposer's use of CITI Marks (priority)
511	OPP008972-8973	1/21/04 - The New York Times: "Strong Credit Card Portfolio Helps Spur Citigroup Profit" (pC4)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
512	OPP008964-8965	12/14/04 - The New York Times: "Citigroup Says It Will Issue American Express Cards" (pC1)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
513	OPP008954-8955	6/5/05 - The Associated Press: "Citigroup to Buy Federated"	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
514	OPP008943-8944	3/2/07 - The Associated Press Financial Wire: "Citigroup Eases Rules on Consumer Credit Card Accounts"	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
515	OPP008931-8932	10/1/07 - American Banker: "Citi, Expedia Eye Mass Market" (p7)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
516	OPP008921-8922	2/21/08 - American Banker: "Citi Wins Contract To Issue Travel Cards For Defense"(p6)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card and travel services offered by Opposer under CITI Marks

<b>NOR Ex. Number</b>	<b>Bates Range or Deposition Exhibit</b>	<b>Description</b>	<b>Trademark Rule</b>	<b>Relevance</b>
517	OPP008896	10/16/09 - Cardline: "Citi's Global Branded Cards Unit Posts \$6 Million Profit" (p4)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
518	OPP008890-8891	8/10/10 - American Banker: "Citi Bolsters Commercial Card Features" (p11)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
519	OPP008888-8889	8/24/10 - American Banking and Market News: "Macys to Offer Citibank American Express Credit Card"	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
520	OPP008855-8856	4/22/11 - Cardline: "Citi's Branded Card Operation Posts \$864 Million Q1 Profit" (p2)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
521	OPP008829-8830	1/4/12 - The Washington Times: "Citibank Links Card Rewards to Facebook; Holders Can Pool Points with Others" (pA9)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
522	OPP008818-8819	2/1/12 - American Banker: "Citi's iPad Banking App Now Accepts Credit Card Users"	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
523	OPP008795-8796	5/16/12 - Zach's Investment Research: "Citi & AA Launch New Travel Cards"	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card and travel services offered by Opposer under CITI Marks
524	OPP013132	5/18/05 - TODAY: "Citi Steps Up S'Pore Presence" (p33)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks in Singapore; use of family of CITI Marks in Singapore; Applicant's intent in adopting a CITI-prefixed

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				mark
525	OPP013157	1/12/06 - Singapore News: "Citi Launches Dividend Platinum" (p9)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks in Singapore; use of family of CITI Marks in Singapore, including for credit card services; Applicant's intent in adopting a CITI-prefixed mark
526	OPP001441-1443	11/13/00 - "Citigroup Announces New Generation of Online Trading and Banking with Cititrade and Citibank Online" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of Family of CITI Marks
527	OPP001444-1445	1/23/02 - "Citibank Introduces New Debit Card Earning American Airlines AAdvantage Miles" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of Family of CITI Marks (priority); credit card and travel services offered by Opposer under CITI Marks
528	OPP008970-8970	3/22/04 - "Citi Cards Website Ranked #1 By Watchfire GomezPro; Citi Cards Site Top-Ranked for Fifth Consecutive Period" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of Family of CITI Marks (priority)
529	OPP009314-9315	4/13/04 - "Citi Introduces Home Rebate Platinum Select MasterCard" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of Family of CITI Marks (priority); credit card services offered by Opposer under CITI Marks
530	OPP001455	3/29/06 - "US: Citibank Expands Distribution and Customer Reach with Internet Bank" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of Family of CITI Marks (priority)
531	OPP009179-9181	10/5/06 - "Citi Expands Citi/AAdvantage Card Private Pass Program with Exclusive Cardmember Only Experiences and Access" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of Family of CITI Marks (priority); credit card and

NOR Ex. Number	Bates Range or Deposition Exhibit	Description	Trademark Rule	Relevance
				travel services offered by Opposer under CITI Marks
532	OPP008933-8935	6/4/07- "American Airlines and Citicards Celebrate 20-year Relationship" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of Family of CITI Marks (priority); credit card and travel services offered by Opposer under CITI Marks
533	OPP008929-8930	10/29/07- "Citi Debuts New National Advertising Campaign for US Citi Cards" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of Family of CITI Marks (priority); credit card services offered by Opposer under CITI Marks
534	OPP009769	1/7/10 - "Citi Named Best Cash Management Bank by Finance Asia" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks in U.S. and Asia; use of Family of CITI Marks
535	OPP009770	1/11/10 - "FinanceAsia Picks Citi as Best Bank in Asia" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks in U.S. and Asia; use of Family of CITI Marks
536	OPP008892-8893	8/10/10 - "Citi Ranked Number One US Corporate Card Issuer by The Nilson Report" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of family of CITI Marks; credit card services offered by Opposer under CITI Marks
537	OPP008843-8845	7/18/11 - "Citi Cards and American Airlines Introduce New Elite Traveler Credit Card with Expanded Suite of Co-Branded Product Offerings" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of family of CITI Marks; credit card and travel services offered by Opposer under CITI Marks

<b>NOR Ex. Number</b>	<b>Bates Range or Deposition Exhibit</b>	<b>Description</b>	<b>Trademark Rule</b>	<b>Relevance</b>
538	OPP008816-8817	3/15/12 - " Citi Named Best Global Treasury and Cash Management Provider by Global Finance Magazine; Wins Eight Additional Awards Recognizing Continued Leadership in Regions and Categories, Including Best Purchasing Card Provider" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of family of CITI Marks; credit card services offered by Opposer under CITI Marks
539	OPP008806-8807	3/21/2012 - "Citi Launches Program Audit Tool for Commercial Card Clients" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of family of CITI Marks; credit card services offered by Opposer under CITI Marks
540	OPP009001-9003	6/13/12- "Citi Wins 2012 Celent Model Bank Award" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of family of CITI Marks
541	OPP001391-1392	8/2/02 Citibank Website	2.122(e)	At least the likelihood of confusion and dilution: Historic use of Family of CITI Marks (priority)
542	OPP001394	12/30/06 Citi Website	2.122(e)	At least the likelihood of confusion and dilution: Historic use of Family of CITI Marks (priority)
543	OPP001396-1397	2/4/08 Citi Website	2.122(e)	At least the likelihood of confusion and dilution: Historic use of Family of CITI Marks (priority)
544	OPP001400	4/3/02 Citibank Website-CitiManager Commercial Cards	2.122(e)	At least the likelihood of confusion and dilution: Historic use of Family of CITI Marks (priority)
545	OPP001402	8/5/04 Citibank Website-CitiManager Commercial Cards	2.122(e)	At least the likelihood of confusion and dilution: Historic use of Family of CITI Marks (priority)
546	OPP001410	8/1/01 Citibank Website-Credit Cards	2.122(e)	At least the likelihood of confusion and dilution: Historic use of Family of CITI Marks (priority)
547	OPP001412	6/17/05 Citibank Website-Credit Cards	2.122(e)	At least the likelihood of confusion and dilution: Historic use of Family of

<b>NOR Ex. Number</b>	<b>Bates Range or Deposition Exhibit</b>	<b>Description</b>	<b>Trademark Rule</b>	<b>Relevance</b>
				CITI Marks (priority)
548	OPP012147-12148	8/11/2012 Citi Singapore Website	2.122(e)	At least the likelihood of confusion and dilution: Use of CITI Marks in Singapore and targeting Singapore residents; Applicant's intent in adopting CITI-prefixed mark
549	OPP011422-11423	8/11/2012 Citi Singapore Website-Credit Cards	2.122(e)	At least the likelihood of confusion and dilution: Use of CITI Marks in Singapore and targeting Singapore residents; Applicant's intent in adopting CITI-prefixed mark
550	OPP011847-11849	8/11/2012 Citi Singapore Website-Citibank Rewards Card	2.122(e)	At least the likelihood of confusion and dilution: Use of CITI Marks in Singapore and targeting Singapore residents; Applicant's intent in adopting CITI-prefixed mark
551	OPP011878-11880	8/11/2012 Citi Singapore Website-Citi Rewards	2.122(e)	At least the likelihood of confusion and dilution: Use of CITI Marks in Singapore and targeting Singapore residents; Applicant's intent in adopting CITI-prefixed mark
552	OPP012610-12615	8/11/2012 Citi Singapore Website-Citibank PremierMiles Card	2.122(e)	At least the likelihood of confusion and dilution: Use of CITI Marks in Singapore and targeting Singapore residents; Applicant's intent in adopting CITI-prefixed mark
553	OPP001543-1560	9/16/2008 Citibank.com Website	2.122(e)	At least the likelihood of confusion and dilution: Historic use of Family of CITI Marks (priority)
554	OPP006357-6496	2001 Citigroup Annual Report	2.122(e)	At least the likelihood of confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
555	OPP006497-6616	2002 Citigroup Annual Report	2.122(e)	At least the likelihood of confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
556	OPP006617-	2003 Citigroup Annual	2.122(e)	At least the likelihood of

<b>NOR Ex. Number</b>	<b>Bates Range or Deposition Exhibit</b>	<b>Description</b>	<b>Trademark Rule</b>	<b>Relevance</b>
	6792	Report		confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
557	OPP006793-6972	2004 Citigroup Annual Report	2.122(e)	At least the likelihood of confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
558	OPP006973-7172	2005 Citigroup Annual Report	2.122(e)	At least the likelihood of confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
559	OPP007173-7380	2006 Citigroup Annual Report	2.122(e)	At least the likelihood of confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
560	OPP007381-7596	2007 Citigroup Annual Report	2.122(e)	At least the likelihood of confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
561	OPP007597-7848	2008 Citigroup Annual Report	2.122(e)	At least the likelihood of confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
562	OPP007849-8132	2009 Citigroup Annual Report	2.122(e)	At least the likelihood of confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
563	OPP008133-8444	2010 Citigroup Annual Report	2.122(e)	At least the likelihood of confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
564	OPP008445-8764	2011 Citigroup Annual Report	2.122(e)	At least the likelihood of confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
565	Raj Dep. Exhibit 1	Opposer's Notice of Deposition to Applicant	2.120(j)	At least the likelihood of confusion and dilution: Deposition exhibit
566	Raj Dep. Exhibit 3	Trademark/Service Mark Application, Principal Register, TEAS Plus Application	2.120(j); 2.122(b)	At least the likelihood of confusion and dilution: Deposition exhibit (federal trademark application for

<b>NOR Ex. Number</b>	<b>Bates Range or Deposition Exhibit</b>	<b>Description</b>	<b>Trademark Rule</b>	<b>Relevance</b>
				applied-for mark); cited priority date and goods/services
567	Raj Dep. Exhibit 4	Amended Notice of Opposition	2.120(j)	At least the likelihood of confusion and dilution: Deposition exhibit; Opposer's cited CITI-prefixed marks in family of CITI Marks
568	Raj Dep. Exhibit 7	Website Printout from www.citair.net	2.120(j); 2.122(e)	At least the likelihood of confusion and dilution: Deposition exhibit; Applicant's use of applied-for mark; services offered by, or purported to be offered by, Applicant under applied-for mark
569	Raj Dep. Exhibit 8	Website Printout from www.citairtravel.com	2.120(j); 2.122(e)	At least the likelihood of confusion and dilution: Deposition exhibit; Applicant's use of applied-for mark; services offered by, or purported to be offered by, Applicant under applied-for mark
570	Raj Dep. Exhibit 13	Photocopy of Citiair Travel Business Card	2.120(j)	At least the likelihood of confusion and dilution: Deposition exhibit; Applicant's use of applied-for mark
571	Raj Dep. Exhibit 15	CONFIDENTIAL EXHIBIT- REDACTED	2.120(j)	
572	Raj Dep. Exhibit 19	6/17/12-WHOIS Search Results for citiairtravel.net	2.120(j); 2.122(e)	At least the likelihood of confusion and dilution: Deposition exhibit; priority of Opposer's use of family of CITI Marks
573	Raj Dep. Exhibit 20	6/17/12-WHOIS Search Results for citiairtravel.net	2.120(j); 2.122(e)	At least the likelihood of confusion and dilution: Deposition exhibit; priority of Opposer's use of family of CITI Marks
574	Raj Dep. Exhibit 23	6/27/12-WHOIS Search Results for citiair.net	2.120(j); 2.122(e)	At least the likelihood of confusion and dilution: Deposition exhibit; priority of Opposer's use of family of CITI Marks
575	OPP001909-1911	3/12/1964 "It's Your Citi" New York Times Advertisement (pp A14-A15)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's Family of CITI Marks;

<b>NOR Ex. Number</b>	<b>Bates Range or Deposition Exhibit</b>	<b>Description</b>	<b>Trademark Rule</b>	<b>Relevance</b>
				historic use of Family of CITI Marks (priority)
576	OPP002038	6/21/05-Citigroup CitiDirect-Online Banking Website	2.122(e)	At least the likelihood of confusion and dilution: Historic use of Family of CITI Marks (priority)
577	OPP002102-2105	TARR Report-CITIRAIL-01651021-1991-07-16	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
578	OPP002072-2075	TARR Report-CITIMILES-1878857-1995-02-14	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
579	OPP002021-2024	TARR Report-CITIDIRECT-2261522-1999-07-13	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
580	OPP001984-1987	TARR Report-CITI NEVER SLEEPS-1104470-1978-10-17	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
581	OPP001943-1947	TARR Report-CITIBANK-691815-1960-01-19	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
582	OPP001895-1898	TARR Report-CITI-1181467-1981-12-08	2.122(d)	Claimed member of family of CITI Marks
583	OPP001862-1865	TARR Report-CITIGOLD-1824600-1994-03-01	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
584	OPP001831-1834	TARR Report-CITICARD-1024861-1975-11-11	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
585	OPP001822-1825	TARR Report-CITICORP TRAVELERS CHECKS-1380723-1986-01-28	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
586	OPP001813-1816	TARR Report-IT'S YOUR CITI-1381750-1986-02-04	2.122(d)	Claimed member of family of CITI Marks
587	OPP002045-2049	TARR Report-CITITRAVEL-2954363-2005-05-24	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
588	OPP002843-2847	TARR Report-CITI-2424088-2001-01-23	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
589	OPP002767-	TARR Report-CITI-	2.122(d)	At least the likelihood of

<b>NOR Ex. Number</b>	<b>Bates Range or Deposition Exhibit</b>	<b>Description</b>	<b>Trademark Rule</b>	<b>Relevance</b>
	2771	3086206-2006-04-25		confusion and dilution: Claimed member of family of CITI Marks
<b>590</b>	OPP002673-2676	TARR Report-CITIMILES-1880842-1995-02-28	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>591</b>	OPP002650-2653	TARR Report-CITICARD-1423239-1986-12-30	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>592</b>	OPP002617-2621	TARR Report-CITI THANK YOU-3948111-2011-04-19	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>593</b>	OPP002586-2589	TARR Report-CITIMANAGER-2565005-2002-04-30	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>594</b>	OPP002562-2566	TARR Report-CITI FORWARD-3702463-2009-10-27	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>595</b>	OPP002542-2546	TARR Report-CITI FIELD-3635724-2009-06-09	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>596</b>	OPP002523-2526	TARR Report-CITI EXECUTIVE-4036335-2011-10-04	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>597</b>	OPP002473-2476	TARR Report-CITI DOLLARS-3412382-2008-04-15	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>598</b>	OPP002422-2425	TARR Report-CITI CASHRETURNS-3419395-2008-04-29	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>599</b>	OPP002398-2401	TARR Report-CITIBUSINESS-2263621-1999-07-20	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>600</b>	OPP002376-2380	TARR Report-CITI BONUS CASH CENTER-3419264-2008-04-29	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>601</b>	OPP002326-2330	TARR Report-CITIGROUP-2406753-2000-11-21	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks

<b>NOR Ex. Number</b>	<b>Bates Range or Deposition Exhibit</b>	<b>Description</b>	<b>Trademark Rule</b>	<b>Relevance</b>
602	OPP002288-2292	TARR Report-CITIBANK-2636299-2002-10-15	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
603	OPP002271-2274	TARR Report-CITIBANK-3622937-2009-05-19	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
604	OPP002189-2193	TARR Report-CITI-3441460-2008-06-03	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
605	OPP013770-3835	Raj Non-Confidential Deposition Excerpts	2.122(e)	At least the likelihood of confusion and dilution: Discovery deposition excerpts of Prakash Raj: priority, Applicant's intent, fame of CITI family of marks, usage of applied-for mark; revenues of Applicant under applied-for mark; target population; weakness of applied-for mark
606	OPP013836-8368	Website printout from <a href="http://thankyoucompanion.com">thankyoucompanion.com</a>	2.120(j)	At least the likelihood of confusion and dilution: Credit card and travel services offered by Opposer under Opposer's family of CITI Marks
607	OPP013020	Website printout from <a href="http://www.eknazar.com">www.eknazar.com</a>	2.120(j)	At least the likelihood of confusion and dilution: Similarity in relevant trade channels and target demographic, as well as market interface between Applicant and Opposer
801	OPP013767-3769	CONFIDENTIAL EXHIBIT- REDACTED PAGE IN NOR EX. 605	2.120(j)	