

**CERTIFIED TRANSCRIPT**

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

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CITIGROUP, INC.,

Opposer(s),

-against-

Serial No.: 85/409, 664

Opposition No. 91201920

CITIAIR, LLC.,

Applicant(s).

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TRIAL DEPOSITION OF:

PRAKASH RAJ

THURSDAY, DECEMBER 13, 2012

ALBANY, NEW YORK

**Redacted**

REPORTED BY: ROBERTA-ANNE SCHMITT

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F E D E R A L S T I P U L A T I O N S

IT IS HEREBY STIPULATED AND AGREED by and between the attorneys for the respective parties hereto that filing, sealing and certifications are hereby waived;

IT IS FURTHER STIPULATED AND AGREED that the within examination may be subscribed and sworn to before any Notary Public with the same force and effect as though subscribed and sworn before the Court.

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I N D E X

TO TESTIMONY

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1 P. Raj Trial Testimony held 12-13-12

2 THIS IS THE ORAL DEPOSITION OF PRAKASH  
3 RAJ, called on behalf of the APPLICANT herein,  
4 produced pursuant to NOTICE on THURSDAY,  
5 DECEMBER 13, 2012, before ROBERTA-ANNE SCHMITT,  
6 a Court Reporter and Notary Public in and for  
7 the State of New York.

8 \* \* \* \* \*

9 PRAKASH RAJ

10 called as the witness, hereinbefore  
11 named, being first duly cautioned and sworn or  
12 affirmed by Roberta-Anne Schmitt, the Court  
13 Reporter and Notary Public herein, to tell the  
14 truth, the whole truth, and nothing but the  
15 truth, was examined and testified as follows:

16 EXAMINATION BY

17 MR. SWYERS:

18 Q Can you state your name for the record,  
19 please?

20 A Prakash Raj.

21 Q Can you spell both your first and your  
22 last name?

23 A P-R-A-K-A-S-H, that's my first name. And  
24 my last name is R-A-J.

25 Q And what is the name of your current

1 P. Raj Trial Testimony held 12-13-12  
2 employer?

3 A GlobalFoundries LLC.

4 Q And where are they located?

5 A They are located in Malta, New York.

6 Q And what do you do for them?

7 A I'm new product introduction.

8 Q What does that entail?

9 A It's like introduce new products into the  
10 company.

11 Q Okay. What type of products do they make?

12 A Like we make semiconductor related stuff,  
13 all those gadgets, like tablets, internal  
14 processors for tablets and PCs.

15 Q And when you say tablets, tablet  
16 computers?

17 A Tablet computers.

18 Q Can you tell us a little bit about your  
19 educational history?

20 A I graduated from India, Bachelor of  
21 Engineering, and I did my Master's in  
22 engineering in Singapore.

23 Q What universities were these?

24 A One is in Madurai Kamaraj.

25 Q Can you spell that for us?

1 P. Raj Trial Testimony held 12-13-12

2 A M-A-D-U-R-A-I.

3 Q Second word?

4 A Kamaraj, K-A-M-A-R-A-J, University.

5 And the next one is National University of  
6 Singapore.

7 Q Are you a United States citizen?

8 A No.

9 Q And forgive me for asking, but are you  
10 here legally?

11 A Yes.

12 Q And how?

13 A I'm employed with GlobalFoundries, and  
14 they sponsor my Visa.

15 Q Now, where were you born?

16 A I born in India. I guess today's my  
17 birthday, too.

18 Q Really?

19 A Yes.

20 Q Okay. Happy birthday. I did not know  
21 that.

22 A You just remind.

23 Q Is today your 40th birthday?

24 A Yes.

25 Q What a wonderful 40th birthday.

1 P. Raj Trial Testimony held 12-13-12

2 A It's a good day for me.

3 MR. SWYERS: Off the record.

4 (At which time, a discussion  
5 was held off the record.)

6 MR. SWYERS: Back on.

7 BY MR. SWYERS:

8 Q Can you provide for us a chronological  
9 history of where -- what countries you've  
10 lived in for these past four years?

11 A Okay. Like first 20 years, I lived in  
12 India, and then after my undergrad, I  
13 moved to Singapore for my Master's in '96,  
14 and I started working there since in 2002,  
15 and I'm a citizen of Singapore.

16 And in 2004, we came to the U.S. for my  
17 previous company and back and forth till  
18 2007.

19 And 2007 till now, I'm living in  
20 Northeast.

21 Q When you say back and forth 2004 to 2007,  
22 that's back and forth between where, the  
23 United States and Singapore?

24 A And Singapore.

25 Q So just so I get this right, you were born

1 P. Raj Trial Testimony held 12-13-12

2 40 years ago?

3 A '72.

4 Q And then from '72 to '96 --

5 A Six.

6 Q -- you were in India?

7 A Yes.

8 Q '96 to 2002 in Singapore?

9 A 2004.

10 Q 2004, excuse me.

11 And then between 2004 to today, you've  
12 gone back and forth between Singapore and  
13 the United States, but you've been here in  
14 the United States since 2007?

15 A Yes, since 2007.

16 Q Okay. Thank you.

17 You mentioned 2007 to the present, you've  
18 been in the U.S. and in specifically the  
19 Northeast in the U.S. What cities have  
20 you resided in?

21 A I started in Massachusetts, north  
22 Dartmouth, for a year and then moved to  
23 Albany in 2008, November, and I'm living  
24 since November 2008 here.

25 Q I'd like to direct your attention back to

1 P. Raj Trial Testimony held 12-13-12  
2 1998.

3 Where were you living in 1998?

4 A 1998, I -- I'm -- I was -- I'm living  
5 in -- I'm in Singapore.

6 Q Okay. Now, did there come a time that you  
7 became familiar with a company by the name  
8 of Citiair?

9 A Yes. We -- yes, and it's the company we  
10 formed at the time from Serangoon Air  
11 Travel.

12 Serangoon, S-E-R-A-N-G-O-O-N, Air, A-I-R,  
13 Travel.

14 Q Who formed this company?

15 A It's formed by four people.

16 Q Can you tell us who that was?

17 A It's Sasi, S-A-S-I, she's a lady, and  
18 Hussain, H-U-S-S-A-I-N, and I was part of  
19 them with them, I'm with them, and Sasi's  
20 dad.

21 Q Do you know his name?

22 A It's a very long name. Abdulgaffor, and I  
23 don't remember the last name. Sorry about  
24 that. A-B-D-U-L-G-A-F-F-O-R. I hope  
25 that's the right spelling.

1 P. Raj Trial Testimony held 12-13-12

2 Q What did Serangoon Travel do?

3 A Serangoon Travel does take us from  
4 Singapore to India, predominantly on that  
5 side. GSA, it's a general sales agent.

6 Q Do they still exist?

7 A They still exist.

8 Q Okay. What is the relationship between  
9 that entity and Citiair Singapore?

10 A Citiair Singapore is -- it's a spinoff  
11 from Serangoon Air in 1998, and it belongs  
12 to the same people.

13 Q What was the purpose of the spinoff?

14 A We want to make it Indianized, so -- so  
15 that's why we came up with the name.

16 Q What does Indianized mean?

17 A It means our main purpose in Singapore is  
18 to sell the Indian workers to --  
19 affordable tickets in a cheaper cost.

20 Q Tickets to where?

21 A To India, back to their homeland.

22 Q Just so the record is clear, what type of  
23 tickets?

24 A Air tickets.

25 Q So is it fair to say that the purpose of

1 P. Raj Trial Testimony held 12-13-12

2 Citiair was to offer them travel services  
3 for what you've testified?

4 A Yes.

5 Q Now, Citiair Singapore, how are these  
6 services provided?

7 A Citiair, it's -- Singapore. Singapore  
8 service provided like people can call the  
9 office, and we have outsourcing office in  
10 India, so the people there pick up the  
11 hotline number and book their tickets and  
12 buy by transferring the money through  
13 bank, or credit card, or cash or whatever  
14 depositing.

15 Q What, if any, involvement did you have in  
16 the selection of the name Citiair for the  
17 company?

18 A Can you please repeat that?

19 Q Did you have any involvement in selecting  
20 the name Citiair?

21 A Yes.

22 Q And can you tell us about that?

23 A Like I was associated with them since '96,  
24 when I moved there, so when they want to  
25 make it -- when they want to spin off a

1 P. Raj Trial Testimony held 12-13-12

2 newer company, and then we were trying to  
3 find a name, and so, working with them or  
4 brainstorming with them on what can be  
5 done.

6 Q All right. And ultimately, you all  
7 settled on Citiair?

8 A Yes.

9 Q Why?

10 A Like the name is like us -- as I mentioned  
11 earlier, like we sell mostly for people in  
12 India or Indian origin who want to go back  
13 to India, and we want to make it more  
14 related to Indianized.

15 Like culturally, we are more religious or  
16 Yoga kind of people. Like it's called  
17 like all the gods' names. Like with in  
18 front name, like mister, when we call  
19 ourselves mister, they put like a city,  
20 Vinayagar, V-I-N-A-G-A-R (sic). That's a  
21 god's name. It means enlighten.

22 Q And so this is the connotation that the  
23 term city has there?

24 A Yeah. In front, they will put like city,  
25 so it's -- it's a god name. It comes

1 P. Raj Trial Testimony held 12-13-12

2 like -- what do you call it?

3 Q Okay.

4 A It's like enlightenment. That's how all  
5 the Yogas and --

6 Q So that's why you picked the term Citi?

7 A Yes.

8 Q How about Air?

9 A Air, we sell air services, so --

10 Q It seemed like a natural fit?

11 A Natural fit.

12 Q And this was in Singapore in 1998;  
13 correct?

14 A Yes, correct.

15 Q Now, at the time in Singapore in 1998,  
16 what, if any, knowledge did you have about  
17 any financial institutions using the name  
18 Citi?

19 A I, you know, had not heard of those names  
20 at the time.

21 Q You were not aware of any financial  
22 institutions --

23 A No, not at the time.

24 Q Okay.

25 -- using Citi?

1 P. Raj Trial Testimony held 12-13-12

2 A Yes.

3 Q You, I believe, testified earlier that  
4 Singapore Citiair has been in business  
5 since 1998; correct?

6 A Yes, since 1998.

7 Q Are they still in business today?

8 A Still in business.

9 Q Are they still using Citiair?

10 A Yes.

11 Q I'd like to direct your attention now to  
12 the United States.

13 You testified that you moved to the United  
14 States for the first time in 2004.

15 Did there come a time that you founded or  
16 incorporated a travel company here in the  
17 United States?

18 A In 2004?

19 Q Or thereafter.

20 A Could you repeat -- rephrase it again?

21 Q Absolutely.

22 A Sorry.

23 Q Once you came to the United States, did  
24 there come a time that you founded a  
25 travel services company here?

1 P. Raj Trial Testimony held 12-13-12

2 A I'm sorry. I couldn't get that.

3 Q That's fine.

4 Did you start a Citiair here?

5 A Yes.

6 Q And when was that?

7 A In 2009, on March 13.

8 Q Okay. And who, if anyone, did you found  
9 that with?

10 A Along with my wife. Initially, we founded  
11 four -- with the same people, Sasi,  
12 Hussain, and my wife and myself.

13 Q You say "initially." Has that changed  
14 over the years?

15 A Yes.

16 Q How so?

17 A In 2011 -- '10, we agreed, okay, we make  
18 it all people who lives here, and we make  
19 it separated, and but still we change the  
20 owner's name.

21 Q Okay.

22 A But they were part of -- still they part  
23 of that business.

24 Q And so --

25 A On paper, they are not.

1 P. Raj Trial Testimony held 12-13-12

2 Q So sitting here today, who are the owners  
3 of Citiair U.S.?

4 A Nusha Selvam, that's my wife. N-U-S-H-A.  
5 Selvam, her last name, S-E-L-V-A-M. And  
6 my kids' names, that's all Pretesh and  
7 Rithvikka.

8 Q Would you spell those for us, please?

9 A P-R-E-T-E-S-H, that's Pretesh, and  
10 Rithvikka, R-I-T-H-V-I-K-K-A.

11 Q What is the official name of Citiair here  
12 in the U.S.?

13 A Citiair, LLC.

14 Q And for what purpose was it founded?

15 A It's founded for same -- similar concept  
16 as in Singapore, for air tickets to --  
17 cheap air tickets to India.

18 Q Is there still a corporate relationship  
19 with the Singapore Citiair?

20 A Yes.

21 Q Describe that for us.

22 A Like all of our strategies are uniform  
23 across the board, like U.S. and Singapore,  
24 and same concept of marketing and selling  
25 to the same like segment of people, and

1 P. Raj Trial Testimony held 12-13-12

2 that's -- it's all mostly for Indian  
3 customers.

4 Q Where are the corporate offices for the  
5 U.S.?

6 A U.S. is my home at this point.

7 Q Is Citiair your primary business or --

8 A No.

9 Q Your work for the company you have already  
10 testified about is?

11 A Yes, GlobalFoundries is my primary job.

12 Q When did you first offer travel services  
13 under the Citiair name here in the U.S.?

14 A In 2009, March, we registered it, and  
15 June, we started the company officially,  
16 and we started selling tickets from that  
17 time.

18 Q And anticipating my next question, what  
19 were the initial services that you  
20 offered?

21 A Sell from U.S. to India tickets, air  
22 tickets.

23 Q Okay. When you say air tickets, you mean  
24 airline tickets to India between India and  
25 the U.S.?

1 P. Raj Trial Testimony held 12-13-12

2 A Yes, correct.

3 Q Anywhere else?

4 A No.

5 Q Initially, how were these services  
6 offered?

7 A Initially, the -- like we have a 1-800  
8 number, so people call that number, and we  
9 have an outsourcing office in India, so  
10 they'll pick up the call, and they make a  
11 booking for them. And if the price  
12 matches, and that's good, they'll buy.

13 Q Okay. Back in 2009, when you first  
14 started Citiair U.S., what, if any,  
15 marketing did you do for it?

16 A What marketing? Marketing, we normally  
17 does it on -- all the time repeating  
18 Indian, so that's what it is. So  
19 initially we started distributing our  
20 business cards in Indian stores, Indian  
21 groceries, Indian -- I got distracted,  
22 sorry.

23 Q That's fine. You were talking about  
24 marketing, initial marketing.

25 A Yes. Indian grocery stores and later

1 P. Raj Trial Testimony held 12-13-12  
2 started attending Indian festivals,  
3 regional Indian festivals because Indian  
4 got like more than 26 plus languages  
5 across.

6 Q When you initially started in 2009, did  
7 you have a website for Citiair U.S.?

8 A Yes. I did register a few websites under  
9 Citiair, Citiair.net and .org,  
10 myCitiair.com, and then Citiairtravel.com  
11 and Citiairtravel.net.

12 Q Okay. And we will come back to those.  
13 At the time that you started Citiair U.S  
14 in 2009, what, if any, knowledge did you  
15 have concerning the Opposer, Citigroup?

16 A None.

17 Q Okay. Since 2009, has there ever been a  
18 time that you were not using the name  
19 Citiair to identify your services?

20 A Repeat the question. Sorry.

21 Q Sure.

22 Since 2009, have you continuously used  
23 Citiair to identify your services?

24 A Yes.

25 Q And it's still in use today?

1 P. Raj Trial Testimony held 12-13-12

2 A Yes.

3 Q I'd like to direct your attention now to  
4 the application that is being opposed in  
5 the instant proceeding.

6 What, if any, familiarity do you have with  
7 the logo that is the subject of that  
8 application?

9 A The -- the Citiair logo?

10 Q Correct.

11 Are you familiar with it generally?

12 A Yes.

13 Q Can you describe it for us?

14 A That's the logo with the plane, airplane,  
15 shows we sell air tickets to -- air  
16 tickets, so that's the logo all about, the  
17 company name Citiair and that.

18 Q Who created the logo?

19 A A person in Singapore.

20 Q Do we know who specifically or just a  
21 designer?

22 A It's a designer.

23 Q Do you know about when that was created?

24 A In 2010, December.

25 Q When, if at all, did Citiair LLC, the

1 P. Raj Trial Testimony held 12-13-12

2 United States Citiair, begin use of the  
3 logo?

4 A Since 2010.

5 Q Roughly when it was created?

6 A Yes.

7 Q Okay. And since December is the last  
8 month in 2010 --

9 A Correct.

10 Q -- is it safe to assume it was  
11 December 2010?

12 A Correct, yes.

13 Q How about Citi -- I'm sorry, Citiair  
14 Singapore; do you know?

15 A Citiair Singapore continued to use the  
16 name Citiair with the plane on it.

17 Q Returning to Citiair U.S., so the record  
18 is clear --

19 A Citiair U.S., okay.

20 Q So the record is clear, I've bounced back  
21 and forth. Whenever I refer to Citiair,  
22 LLC, I'm also referring to Citiair, the  
23 U.S. Citiair.

24 A Okay.

25 Q Has the logo, the logo we're speaking

1 P. Raj Trial Testimony held 12-13-12  
2 about, been in use by Citiair U.S  
3 continuously since 2010?

4 A Yes, exactly.

5 Q Tell us how it's been used.

6 A It's been used on our website, and then on  
7 our business cards and also on regional  
8 language -- Indian language websites  
9 like -- like Desi Travel, like Desi  
10 websites. That is -- Desi means Indian.  
11 I don't know what it is, but they call it  
12 Desi. It's Indian.

13 So it's used there, also.

14 Q How is it used there?

15 A It's like cheap tickets to India, so  
16 that's how they classify.

17 Q Is there a certain type of advertisement  
18 that's placed that we would call it?

19 A Yes. Like a small banner advertisement on  
20 some regional language websites.

21 Q So is it fair to say the logo is used on  
22 banner advertisements?

23 A Correct.

24 Q Do you know when, approximately, the logo  
25 began to be used on banner advertisements?

1 P. Raj Trial Testimony held 12-13-12

2 A 2011, maybe January. After.

3 Q How about the website?

4 A Website is 2010, December.

5 Q And how about business cards?

6 A Business cards, in mid of 2011.

7 Q Now, in connection with the Citiair logo  
8 that we're speaking about today, what  
9 services have been offered in connection  
10 with that logo?

11 A 99.9 percent, we are offering tickets  
12 to -- air tickets to India, to India from  
13 U.S., also some from U.S. to India.

14 Q Any other locations?

15 A No.

16 Q Directing your attention to the Opposer,  
17 Citigroup here, did there come a time that  
18 you did become aware of the Opposer?

19 A Please repeat the last sentence.

20 Q Did there come a time that you did become  
21 aware of the Opposer, their existence?

22 A I don't understand exactly.

23 Q I'll try --

24 A I'm sorry.

25 Q I'll try it a different way.

1 P. Raj Trial Testimony held 12-13-12

2 Did there come a time that you heard about  
3 the Opposer, that you became knowledgeable  
4 about them?

5 A Yes. After I registered and opposed, so  
6 came to know more about that.

7 Q During this proceeding?

8 A Yes, during this proceeding.

9 Q Would it be fair to say that was the first  
10 time you heard of them, if you know?

11 A I would say yes, correct.

12 Q What industry do you consider Citiair to  
13 be a part of?

14 A Some travel related, which predominantly  
15 99.99 percent is air tickets.

16 Q What, if any, financial services does  
17 Citiair, LLC, offer?

18 A No such thing. We offer -- sell tickets.

19 Q Banking services?

20 A No.

21 Q Credit card services?

22 A No, none.

23 MR. SWYERS: Off the record  
24 for a second.

25 (At which time, a discussion

1 P. Raj Trial Testimony held 12-13-12  
2 was held off the record.)

3 MR. SWYERS: Back on.

4 BY MR. SWYERS:

5 Q Has there come a time that you advertised  
6 on a site called Craigs list?

7 A Yes, I did.

8 Q Tell me about that.

9 A We just put a classified ad like selling a  
10 car or something like that. They used to  
11 have those. I tried one time on Craigs  
12 list.

13 Q One time?

14 A One time.

15 Q Only one time?

16 A Only one time.

17 Q How did it work?

18 A I don't know that it works or not.

19 Q So do you still advertise on Craigs list?

20 A No.

21 Q Did there come a time that you advertised  
22 with the online yellow pages?

23 A Yes.

24 Q Tell us about that.

25 A Like we listed on all the yellow pages,

1 P. Raj Trial Testimony held 12-13-12

2 like -- like Sulekha, S-U-L-E-K-H-A, dot  
3 com, you know, that's their yellow pages,  
4 ekNazar, E-K-N-A-Z-A-R, dot com.

5 Q When were these advertisements placed; do  
6 you know?

7 A It's in 2009, 2010, around that time.

8 Q Okay. Are they still being placed on  
9 those sites?

10 A Yes.

11 Q So to the present?

12 A Yes.

13 Q Now, when we speak about advertisements,  
14 what would someone see on those sites of  
15 Citiair's?

16 A They'll see like travel agent services,  
17 like tickets to India on the particular  
18 segment, category.

19 Q Okay. Directing your attention to Citiair  
20 USA's main website, to what domain name is  
21 that posted?

22 A Right now, on two. One is Citiair.net,  
23 another one is Citiairtravel.com.

24 Q Okay. Speaking --

25 Well, tell me, which was the first site to

1 P. Raj Trial Testimony held 12-13-12

2 go live?

3 A Dot net.

4 Q Okay. Citiair.net?

5 A Yes.

6 Q How long has that site been up?

7 A That site has been up since 2009, May or  
8 June.

9 Q When the website was originally posted --  
10 when the website was originally posted to  
11 Citiair.net, how could it be used by  
12 consumers?

13 A They can go see the telephone number, what  
14 number to call our office to book their  
15 tickets. It's the only thing they can do.  
16 I'm sorry, a couple more.

17 If they want to buy the ticket, they can  
18 go download a ticket order form, they  
19 download the form from the website, sign  
20 it, send their identity that they are  
21 purchasing the ticket.

22 Q When the website was originally posted in  
23 2009, could you buy tickets directly  
24 through the website?

25 A No.

1 P. Raj Trial Testimony held 12-13-12

2 Q How would the orders then be fulfilled?

3 A At the time in 2009?

4 Q Correct.

5 A They called our toll free number or the  
6 agent's direct number associated with  
7 them, inquire about their plan, get the  
8 right itinerary, then buy the ticket.

9 Q How would they get the ticket?

10 A Electronic ticket, that's how it is.

11 Q That would be e-mailed to them?

12 A Yes, it would be e-mailed to them, their  
13 e-mails.

14 Q Now, directing your attention to  
15 Citiairtravel.com, how long has that site  
16 been up?

17 A The site's been up since July 4th.

18 Q Of this year?

19 A Yes.

20 Q All right. Now, if a customer goes to  
21 Citiairtravel.com, how, if at all, did  
22 they use that to get your services?

23 A They use in two ways. One, we have an  
24 online booking engine, they can search  
25 there first, they can book it through

1 P. Raj Trial Testimony held 12-13-12

2 online. And some of the customers check  
3 the price there, call our office, check is  
4 the price similar to our office, buy  
5 through our office.

6 Call our office, check the price, buy  
7 through -- through that particular --  
8 through the office number they call --  
9 that they call.

10 Q Did there come a time that the website  
11 posted to Citiair.net was changed to offer  
12 this online service as well?

13 A Right now -- we did for like July 4th,  
14 we used that online, but it stopped right  
15 now.

16 Q Why did it stop?

17 A Because the service provider, what we are  
18 getting, is not pretty cheap, so it's not  
19 comparable, so we have to stop it first.

20 Q Just for my understanding, so the record  
21 is clear, at Citiairtravel.com, your  
22 customers can purchase tickets online?

23 A Correct.

24 Q Or they can use it to call a  
25 representative?

1 P. Raj Trial Testimony held 12-13-12

2 A Yes.

3 Q But at Citiair.net, they can only use it  
4 to call a representative --

5 A Yes, exactly.

6 Q Can they check ticket prices at  
7 Citiair.net currently?

8 A No.

9 Can I add something more to that?

10 Q You may.

11 A There's -- if you look at the website  
12 maybe later, you will see the online  
13 booking, but it won't work. It won't  
14 work. It's just a thing that's disabled.

15 Q Okay. I'm placing in front of you what  
16 has been marked as Applicant's Exhibit 1.  
17 It's actually only been marked as  
18 Exhibit 1 to your deposition.

19 Can you take a look at that for me,  
20 please.

21 A (Witness complied with counsel's request.)

22 Q If possible, can you identify it?

23 A This is my initial website on Citiair.net.

24 Q That's not what it looks like today?

25 A Yes, it's not what it looks like today.

1 P. Raj Trial Testimony held 12-13-12

2 Q Is that what it looked like in 2009?

3 A Yes. Something similar, yes.

4 Q Okay. Well, I'm going to ask: Is that  
5 what it looked like on Wednesday,  
6 June 20th, 2012?

7 A Yes, correct.

8 Q Flipping through the pages, is this a true  
9 and accurate representation, do you  
10 believe, of the website?

11 A Yes.

12 Q At least in part?

13 A Part of, yes. It's a part of. All the  
14 pages are from the website at the time.

15 MR. SWYERS: I'll offer it  
16 into evidence to his deposition.

17 MR. PLEVAN: No objection.

18 (At which time,  
19 Applicant's Exhibit 1, which was  
20 previously marked for  
21 identification, was received in  
22 evidence.)

23 BY MR. SWYERS:

24 Q Directing your attention to what we have  
25 marked as Exhibit 2.

1 P. Raj Trial Testimony held 12-13-12

2 Can you identify that for me, please?

3 A This is the website we used for  
4 Citiairtravel.com and .net. Now it's  
5 disabled right now.

6 Q All right. If you will look at the third  
7 page of Exhibit 2.

8 A (Witness complied with counsel's request.)

9 Q Does this display where someone can use  
10 the website to identify the costs of  
11 flights?

12 A Yes.

13 Q As of June 27th, 2012, does this  
14 accurately depict the website posted to  
15 Citiairtravel.com?

16 A Yes, correct.

17 Q If I may, directing your attention to both  
18 1 and 2, how, if at all, has Exhibit 1 of  
19 the website posted to Citiair.net changed  
20 from this rendition?

21 A To 2?

22 Q No, I apologize.  
23 How has Citiair.net changed, if at all,  
24 from June 20th, 2012, to the present?  
25 Have there been any changes to the

1 P. Raj Trial Testimony held 12-13-12  
2 website?

3 A Yes, some changes happened. Only the  
4 content changed, but almost similar  
5 things.

6 Q All right. The logo that we're speaking  
7 about today, do you see it on Exhibit 1?

8 A Yes.

9 Q Okay. And where is that for the record?

10 A It's over here (Indicating).

11 MR. SWYERS: Let the record  
12 reflect the witness has identified  
13 the logo on the top left-hand  
14 portion of the first page of  
15 Exhibit 1.

16 BY MR. SWYERS:

17 Q Same question for Exhibit 2: Do you see  
18 the logo at issue today on Exhibit 2?

19 A Yes. On the top left corner of this page  
20 (Indicating).

21 Q Thank you.

22 And it's the one with the airplane?

23 A Yes.

24 Q Has there come a time that you restricted  
25 access to Citiair's websites -- any of

1 P. Raj Trial Testimony held 12-13-12

2 Citiair's websites to only members?

3 A No.

4 Q So anyone can use the websites?

5 A Anybody who has Internet access can access  
6 it.

7 Q I'd like to direct your attention to these  
8 Indian community festivals you mentioned  
9 before.

10 I believe you testified that there has  
11 come a time that you promoted Citiair to  
12 the Indian communities in the U.S.; is  
13 that correct?

14 A Yes, correct.

15 Q Tell us a little bit more about that.

16 A So as I mentioned earlier, there are a lot  
17 of festivals in different part of India  
18 that celebrate, and I try to attend most  
19 of the festival across Northeast, and I do  
20 set up a small booth displaying our  
21 business cards on that festival.

22 Q Where in the Northeast?

23 A Like especially in Boston, Albany, and New  
24 Jersey.

25 Q Anywhere else?

1 P. Raj Trial Testimony held 12-13-12

2 A Right now, no.

3 Q Have you ever extended beyond the  
4 Northeast?

5 A No.

6 Q Anywhere in Texas?

7 A Texas, we do display on their Indian  
8 websites, on their web pages, on their  
9 like cultural web pages.

10 Q And from my --

11 A Not on the festival. I haven't attended  
12 those festivals.

13 Q From my understanding, when we say  
14 festivals, tell us what goes on at these  
15 festivals.

16 A These festivals, they have cultural like  
17 regional language, music, dance, and food.

18 Q And evidently, there's an opportunity for  
19 vendors to sell their wares?

20 A Yes. Mostly to sell their -- display or  
21 sell their wares.

22 Q You mentioned that you have a booth when  
23 you go to these festivals. What do you do  
24 in particular to promote Citiair?

25 A So what I do is I distribute business

1 P. Raj Trial Testimony held 12-13-12

2 cards to the people who attend those  
3 festivals, explain about them, about our  
4 business model, and so they can buy cheap  
5 tickets to India.

6 Q Since 2009, how many festivals have you  
7 attended?

8 A Since 2000?

9 Q 2009.

10 A Since 2009? I cannot recollect exactly  
11 how many I attended, but I can say for the  
12 past one year, every quarter I attend  
13 three. So it's almost 12, 12 to 15 range.

14 Q And that would be in 2012?

15 A Yeah, 2012.

16 Q Any recollection as to 2011?

17 A Should be a little less. So maybe around  
18 10.

19 Q And how about back in 2009?

20 A Not much. Less. Very less.

21 Q Less?

22 A Maybe one or two.

23 Q When attending these festivals, has  
24 anyone -- or, well, when, if ever, has  
25 anyone mentioned Citigroup to you?

1 P. Raj Trial Testimony held 12-13-12

2 A None.

3 Q When, if ever, has anyone asked you if you  
4 provided financial services?

5 A None.

6 Q When, if ever, have you seen anyone from  
7 Citigroup at any of these festivals?

8 A Till this moment, I haven't seen anyone.

9 Q Have you ever seen any Citigroup  
10 promotional materials at the festivals  
11 that you've attended?

12 A None. Hundred percent zero.

13 Q So the record is clear, what do we mean by  
14 Indian communities here in the U.S.?

15 A Mean by Indian communities?

16 Q What do you consider to be the Indian  
17 community?

18 A Like they speak a particular language of  
19 any part of India, like Telugu,  
20 T-E-L-U-G-U, or my mother's tongue,  
21 T-A-M-I-L, Tamil, and Hindi, which is the  
22 broader language people speak, and a lot  
23 of subset language, sublanguages across.

24 Q So today, if I'm a customer or a  
25 prospective customer of Citiair, how would

1 P. Raj Trial Testimony held 12-13-12

2 I get your services?

3 A You can call our office 1-800 number,  
4 1800-248-4697, or call our representative  
5 numbers. If they're previous customers,  
6 they can visit the website and check out  
7 the number or try to see the price online.

8 Q And they can use the website to book as  
9 well today?

10 A Yes. Right now, yes, Citiairtravel.com.

11 Q How do your customers pay for these  
12 services?

13 A There are a few ways they can pay. One by  
14 credit cards, and check deposit -- bank  
15 transfer or check deposits.

16 Q What, if any, rewards programs do you  
17 offer?

18 A No, no such thing.

19 Q Can a customer go to the website and pay  
20 for a ticket through any rewards types of  
21 points?

22 A No. Cash-and-carry.

23 Q Has there come a time that Citiair began  
24 using e-mail marketing to promote their  
25 services?

1 P. Raj Trial Testimony held 12-13-12

2 A Would you please repeat that? I missed  
3 the first sentence.

4 Q Sure.

5 Has there come a time that Citiair began  
6 to use e-mail marketing to promote their  
7 goods and services?

8 A Yes. We do e-mail blasts.

9 Q How does that work?

10 A We have opt-in customers for our -- who  
11 are our existing customers.

12 Q Has Citiair ever purchased any lists?

13 A Zero. So far none.

14 Q Do you get lists from any other manner  
15 aside from customers who have opted in?

16 A None.

17 Q How often do you send out e-mail  
18 marketing?

19 A Almost once in a week.

20 Q And what are the subjects of your e-mail  
21 marketing?

22 A It will be subject predominantly like a  
23 super sale, cheap tickets to India or the  
24 city names in India.

25 Q You mentioned the word cheap lots of times

1 P. Raj Trial Testimony held 12-13-12  
2 here today. Why is that?

3 A This is a typical business model we try  
4 with other online or travel agency. We  
5 sell budget, low cost tickets to India,  
6 and that's why like compared with any  
7 other online companies, like Kayak or  
8 directly buy from the airlines, let's say  
9 United, or Air India or Continental, and  
10 we will give the same tickets on a lower  
11 cost.

12 Q And so --

13 MR. SWYERS: Well, I'm going  
14 to designate the next part of this  
15 confidential.

16 BY MR. SWYERS:

17 Q Redacted

18 A

19 Redacted

20 Q

21 Redacted

22

23

24 A Redacted

25

1 P. Raj Trial Testimony held 12-13-12

2 Q Okay. And so within this, well, cost  
3 conscious model, what is your primary  
4 demographic for your services, if you can  
5 tell us?

6 A From U.S.?

7 Q From the U.S.

8 A From the U.S., primary is Northeast, New  
9 York, City of New York, Massachusetts,  
10 Texas, California, Ohio. These are the  
11 places --

12 MR. PLEVAN: I don't think  
13 he was finished.

14 A Ohio and Michigan.

15 Q Is there a particular class of consumers  
16 you're targeting?

17 A Means all of them are Indian.

18 Q And are they more cost conscious?

19 A Most -- to me, most of them, when I say  
20 cheap tickets, they want to try it out.

21 Q And referring to Exhibit No. 1, if I may  
22 direct your attention --

23 A Exhibit No. 1.

24 Q -- is there anywhere where you have a call  
25 to action regarding cheap tickets on the

1 P. Raj Trial Testimony held 12-13-12  
2 website?

3 A Can you please repeat? Sorry.

4 Q Is there anywhere that you mention cheap  
5 tickets on the website?

6 A Yes. Almost everywhere on the top on my  
7 headers, it will be cheap tickets.

8 Q Who, if anyone, do you consider to be  
9 Citiair's primary competitors?

10 A Citiair primary competitors are Alanita,  
11 A-L-A-N-I-T-A, Travel, and MakeMyTrip.com.

12 Q Anyone else?

13 A Yatra, Y-A-T-R-A, dot com, and a couple  
14 more.

15 One more is that Indian Eagle,  
16 IndianEagle.com.

17 Q Anyone else?

18 A I can't think of anyone right now.

19 Q Why would you consider these four to be  
20 your primary competitors?

21 A These are under our same strategical  
22 business model of selling cheap tickets to  
23 India, and their target customers are  
24 pretty much similar to Citiair, LLC.

25 Q What, if any, physical locations does

1 P. Raj Trial Testimony held 12-13-12

2 Citiair U.S. have in the U.S.?

3 A Physical location, we have the registered  
4 office, which is my home. That's all  
5 about.

6 Q Anywhere else?

7 A No.

8 Q What, if any, athletic venues does Citiair  
9 sponsor?

10 A None. No sponsorship.

11 Q What, if any, television advertising does  
12 Citiair do?

13 A So far, no television advertisements from  
14 Citiair, LLC.

15 Q What, if any, paper clip advertising does  
16 Citiair do right now?

17 A None right now.

18 Q How about direct mail advertising?

19 A None.

20 Q What, if any, airport advertising do you  
21 do?

22 A No, none.

23 Q Approximately how much does Citiair spend  
24 on marketing per year, if you know?

25 A Roughly maybe slightly more than \$10,000

1 P. Raj Trial Testimony held 12-13-12  
2 or less. And it varies depending on the  
3 situations.

4 Q Since 2009, has that stayed roughly the  
5 same per year?

6 A Increased every year because our  
7 revenue -- our sale increase, so we had to  
8 push up the marketing effort.

9 Q Citiair U.S. started in 2009. How would  
10 you generally describe the business in  
11 sales since that time? Have they  
12 increased?

13 A Pretty much increased all the time.

14 MR. SWYERS: I'm going to  
15 show him 6, 7, and 8.

16 BY MR. SWYERS:

17 Q I'm handing you what has been marked as  
18 Exhibit 6.

19 Can you identify that for us? Take a look  
20 at it.

21 A (Witness complied with counsel's request.)  
22 That's our sales for every year since 2009  
23 till May 2012.

24 Q All right. And is this a true and  
25 accurate copy of the printout of this?

1 P. Raj Trial Testimony held 12-13-12

2 A Yes, exactly. It's accurate, true copy.

3 MR. SWYERS: And forgive me,  
4 I should have designated this as  
5 confidential in advance. I would  
6 like to designate this portion of  
7 the testimony as well as Exhibit 6  
8 as confidential.

9 Having identified it, I'd  
10 like to also put it into evidence.

11 MR. PLEVAN: The document?

12 MR. SWYERS: The document  
13 itself, yes.

14 MR. PLEVAN: No objection.

15 MR. SWYERS: All right.

16 (At which time,  
17 Applicant's Exhibit 6, which was  
18 previously marked for  
19 identification, was received in  
20 evidence.)

21 BY MR. SWYERS:

22 Q I am handing you now what has been marked  
23 as Exhibit 7.

24 Can you take a look at that and tell us  
25 what that is, please?

1 P. Raj Trial Testimony held 12-13-12

2 A (Witness complied with counsel's request.)

3 This is the sales report for the month  
4 of -- from 20 -- 11/20/11 to 12/31/2011,  
5 and this is all about the tickets we sold  
6 and all the customer details, names and --  
7 yeah.

8 Q So what does this show us?

9 A It show us the city where they fly from,  
10 okay. There's a few on that.

11 Okay. The first page is the transaction  
12 date, and where they departed from, and  
13 who made the ticketing and the ticket  
14 number, how many passengers, and the  
15 invoice number.

16 Q All right. And so would this accurately  
17 reflect the total sales for Citiair U.S.  
18 in 2011?

19 A On this particular -- after Page 1, 2, 3,  
20 4 -- let me go through.

21 (At which time, 11:08 A.M.,  
22 there was a pause in the proceedings  
23 until 11:08 A.M., at which time the  
24 proceedings resumed.)

25 A Yes, this is from the SkyLink.

1 P. Raj Trial Testimony held 12-13-12

2 Is this confidential?

3 Q Yes, we will mark it confidential.

4 MR. SWYERS: As we  
5 discussed, we will keep the  
6 confidentiality designation for  
7 Exhibit 7.

8 MR. PLEVAN: No objection.

9 (At which time,  
10 Applicant's Exhibit 7, which was  
11 previously marked for  
12 identification, was received in  
13 evidence.)

14 BY MR. SWYERS:

15 Q Lastly, I will hand you Exhibit No. 8. If  
16 you could kindly take a look at this and  
17 see if you recognize it.

18 A (Witness complied with counsel's request.)  
19 Yes, it's similar to Exhibit 7, and it's a  
20 same consolidator, SkyLink Travel. It's  
21 written on the first page, so it says sale  
22 of 2012, and the stock we purchased from  
23 them.

24 Q And is this a true and accurate printout  
25 of that SkyLink information?

1 P. Raj Trial Testimony held 12-13-12

2 A Yes, it's exact information.

3 MR. SWYERS: Continuing this  
4 as designated as confidential. I'll  
5 move it into evidence.

6 MR. PLEVAN: No objection.

7 MR. SWYERS: Okay.

8 (At which time,  
9 Applicant's Exhibit 8, which was  
10 previously marked for  
11 identification, was received in  
12 evidence.)

13 MR. SWYERS: One moment  
14 please.

15 (At which time, 11:09 A.M.,  
16 there was a pause in the proceedings  
17 until 11:10 A.M., at which time the  
18 proceedings resumed.)

19 BY MR. SWYERS:

20 Q Has there ever come a time that you were  
21 made aware of any confusion between your  
22 Citiair and Citigroup?

23 A None.

24 MR. SWYERS: I have nothing  
25 further at this time.

1 P. Raj Trial Testimony held 12-13-12

2 MR. PLEVAN: Break?

3 MR. SWYERS: Sure.

4 (At which time, 11:11 A.M.,  
5 there was a pause in the proceedings  
6 until 11:23 A.M., at which time the  
7 proceedings resumed.)

8 EXAMINATION

9 BY MR. PLEVAN:

10 Q Mr. Raj, I'm going to give you a blank  
11 piece of paper, actually three, so it will  
12 be easier to write on. Could you write --  
13 print, put one near the top and print your  
14 name.

15 A On the top?

16 Q Yes, near the top.

17 A Okay. My name.

18 (Witness complied with counsel's request.)

19 Q Let me see it.

20 A (Handing.)

21 Q Okay. Now, I'm going to hand it back to  
22 you.

23 I was trying to understand the testimony  
24 about a god or a phrase in Tamil.

25 What was the name of the god that you

1 P. Raj Trial Testimony held 12-13-12  
2 referred to earlier?

3 A It's Vinayagar.

4 Q Could you write Number 2 and print the  
5 name of the god.

6 A (Witness complied with counsel's request.)

7 Q V-I-N-A-Y-A-G-A-R; correct?

8 A Yes.

9 Q Okay. Now, put a number 3 and write the  
10 word or words that Indianized the name of  
11 your company.

12 A (Witness complied with counsel's request.)  
13 My company. I wrote in my mother tongue.  
14 Sorry.

15 Q Now, the first part of that is written in  
16 Tamil?

17 A Yes.

18 Q Is that right?

19 A Yes.

20 Q And the -- is the -- is Citiair the exact  
21 translation of what you've written in  
22 Tamil?

23 A Yes.

24 Q Now, is there a Tamil equivalent to the  
25 letter C? If you write Number 4, is there

1 P. Raj Trial Testimony held 12-13-12

2 a Tamil letter that's the equivalent of C?

3 A (Witness complied with counsel's request.)

4 Q Okay. And the Number 5, is there a Tamil  
5 letter that's the equivalent of S?

6 A This S, you mean?

7 Q Yes. Like in Serangoon?

8 A Yes.

9 Q Serangoon begins with S?

10 A Yes.

11 Q But what is the Tamil equivalent of the  
12 letter S?

13 A There is no one letter for S, but --  
14 there's no one letter for the S. So one  
15 letter --

16 Q So there's more than one letter?

17 A More than one letter, yes.

18 Q So can you put some of them down, some  
19 examples?

20 A Okay. Yes, literally I can put S.  
21 (Witness complied with counsel's request.)

22 Yeah, right now, I put it like this

23 (Indicating).

24 Q Now, looking at what you've written for C  
25 on Number 4 --

1 P. Raj Trial Testimony held 12-13-12

2 A Uh-huh.

3 Q -- is that pronounced differently than S?

4 A Yes.

5 Q So if I were to say -- if we were to say  
6 Siti, S-I-T-I-A-I-R, would that be  
7 pronounced different than C-I-T-I-A-I-R?

8 A Yes.

9 Q How can --

10 A I can -- can I write it for you?

11 Q Well, I'm talking about sound now.

12 A Yes. It's written different.

13 Q So how is it pronounced?

14 In other words, if I was listening to  
15 this, and I were to say -- if I were to  
16 use the word S-I-T-I -- do you understand  
17 what I'm saying, the word S-I-T-I?

18 A Uh-huh.

19 Q Would that sound the same as the word  
20 C-I-T-I?

21 A In Tamil?

22 Q In any language.

23 If I were listening, and I heard someone  
24 say the word "city," and it was spelled  
25 S-I-T-I, if you saw the word S-I-T-I,

1 P. Raj Trial Testimony held 12-13-12

2 would you pronounce that word differently  
3 than C-I-T-I?

4 A It depends on how -- it depends on how  
5 differently they hear.

6 Q So the S-I-T-I might sound differently to  
7 someone than C-I-T-I?

8 A Yes, correct.

9 Q In English?

10 A I'm not sure about English, but for like  
11 non-English speaking people like me,  
12 sometimes it will be different.

13 Q Tell me how you would pronounce S-I-T-I.  
14 I'd like to hear you say that. I know it  
15 won't come up that way with the court  
16 reporter, but what would it sound like?

17 A Siti.

18 Q Siti?

19 A Yes.

20 Q And that's different from C-I-T-I?

21 A Yes.

22 Q How would you pronounce Citi, C-I-T-I?

23 Go ahead, pronounce. Just say it, don't  
24 write it.

25 A Citi is lower side, Siti is higher side of

1 P. Raj Trial Testimony held 12-13-12  
2 the note.

3 Q Higher side of what?

4 A Like a language. We call that -- in my  
5 mother tongue, we pronounce kuril,  
6 K-U-R-I-L, which is on the lower side,  
7 like a C, C-I-T-I, and nettle, which is S,  
8 which is even the word itself is slightly  
9 different.

10 Q So if you were to see the word S-I-T-I,  
11 you say you would pronounce it differently  
12 than the word C-I-T-I?

13 A Yes, correct.

14 Q And --

15 A To my mother tongue. It has a slightly  
16 different meaning, also.

17 Q What is the different meaning?

18 A S-I-T-I is -- it's a religion, like --  
19 it's not a religion like people do have  
20 name called Siti. People do have the name  
21 S-I-T-I as their name.

22 Q It's a last name?

23 A It could be a last name or maybe first  
24 name.

25 Q Or a first name?

1 P. Raj Trial Testimony held 12-13-12

2 A It could be both.

3 Q When you say people might have that name,  
4 these are people from India that have this  
5 name?

6 A Yes.

7 Q Is it a common name?

8 A Pretty much a common name.

9 Q Do you know non-Indians who have that  
10 name?

11 A I never heard anyone.

12 Q Pardon?

13 A I never heard anyone.

14 Q So it's a name that would be associated  
15 with India?

16 A Yes.

17 MR. PLEVAN: May I have this  
18 marked as Raj Testimony Deposition  
19 1.

20 (At which time, Raj Exhibit  
21 1, Handwritten document, was marked  
22 for identification.)  
23

24 BY MR. PLEVAN:

25 Q In Line 3, are there two different words,

1 P. Raj Trial Testimony held 12-13-12

2 or is that one word?

3 A (No verbal/audible response.)

4 Q The Tamil part.

5 A Right. This one is two different words.

6 Q And how do you pronounce that first word?

7 A Citi.

8 Q And what does that mean, the word you just  
9 pronounced?

10 A Come within.

11 Q Confident?

12 A Come within, come within, come within.

13 Q Come within?

14 A Yes. It's enlighten, enlightenment.

15 Q And how is that used when one addresses  
16 someone in Tamil?

17 A It's people who are enlightened. Say like  
18 a Buddha, when he got enlightened, people  
19 call Citi.

20 Q You mentioned that you use e-mail blasts?

21 A Yes.

22 Q And how long have you been using e-mail  
23 blasts?

24 A Since December 2011.

25 Q Do you have any examples of those with

1 P. Raj Trial Testimony held 12-13-12

2 you?

3 A Right now, I do not have.

4 Q What language are they in?

5 A They are in English.

6 Q Are your websites in English?

7 A Yes, my websites are in English.

8 Q Do you have any Tamil language websites?

9 A No.

10 Q Do you send out any Tamil language e-mail  
11 blasts?

12 A No.

13 Q What is Citigroup?

14 A Would you please elaborate on that?

15 Q Sure.

16 What is Citigroup?

17 A Citigroup, based on my knowledge recently,  
18 is banking services.

19 Q Have you ever seen the name Citigroup?

20 A No.

21 Q Pardon?

22 A No.

23 Q Have you ever seen a bank -- you know, a  
24 bank that you could walk into that had a  
25 sign Citigroup on it?

1 P. Raj Trial Testimony held 12-13-12

2 A No. So far I never walked into any bank.

3 Q Anything else you know about Citigroup?

4 A I'll say no, nothing more.

5 Q When you lived in India, did you live in a  
6 city?

7 A I lived in a town.

8 Q What was the name of the town?

9 A The name of the town is T-U-T-I-C-O-R-I-N.

10 Q Do you have a credit card?

11 A Yes, I do have a credit card now.

12 Q With who?

13 A With -- I have a Visa card, and a Master  
14 credit card, and American Express.

15 Q Who -- what banks -- what bank or banks  
16 issued the Visa and the Master Card?

17 A One of them is from Bank of America, Visa  
18 and Master Card, and American Express is  
19 from American Express itself.

20 Q Right.

21 A And I do have a Visa and Master Card from  
22 Citizens Bank.

23 Q Now, do you know what a rewards program  
24 is?

25 A I heard about it, but I haven't used

1 P. Raj Trial Testimony held 12-13-12

2 those.

3 Q No. My question was: Do you know what a  
4 rewards program is?

5 A Rewards program is -- to me rewards  
6 program is if you use the card, and they  
7 give you points, and they can cash it.

8 Q Cash to points?

9 A Cash to points.

10 Q And do you know whether those sorts of  
11 points can be cashed for travel benefits?

12 A No.

13 Q Now, customers of your service, can they  
14 book travel on a website by typing in  
15 information, one of your websites?

16 A Typing in what kind of information?

17 Q Information. Their name, and where they  
18 want to travel, and their credit card  
19 number.

20 A Yes, they can put in the city where they  
21 want to go from, and the city where they  
22 want to go, and the dates, on board date  
23 and the return date, and they can search  
24 it, and once they will see the price, and  
25 after that, they can put in their

1 P. Raj Trial Testimony held 12-13-12  
2 information.

3 Q And pay by using a credit card number on  
4 the website?

5 A They can pay by credit card on the  
6 website.

7 Q Do you know whether a customer of  
8 Citigroup can go on a Citibank website and  
9 book travel?

10 A I'm not aware of it.

11 Q Do you know what a rupee account is?

12 A I know rupee is Indian money.

13 Q Do you have a rupee account?

14 A No, I do not have a rupee account.

15 Q Do you know what a rupee account is?

16 A No, I do not know.

17 Q Do you have a bank account in India?

18 A Yes, I do have bank accounts in India.

19 Q And when was the last time you lived in  
20 India?

21 A '96. 1996.

22 Q Why do you have a bank account in India  
23 today?

24 A I have bank account in India for trans --  
25 to pay our office in India.

1 P. Raj Trial Testimony held 12-13-12

2 Q Do you have a personal bank account in  
3 India?

4 A Yes, I do have a personal bank account in  
5 India.

6 Q And is that used in connection with the  
7 business?

8 A Not really.

9 Q And why do you have a personal bank  
10 account in India?

11 A Just for my family members. My parents to  
12 use it, because it's a joint account with  
13 my dad.

14 Q And this allows you to transfer money to  
15 him?

16 A Yes.

17 Q And do you earn a higher rate of interest  
18 than you would in a U.S. bank account?

19 A Not really.

20 Q Does Serangoon have a meaning?

21 A Serangoon is a place in Singapore.

22 Q Physical location?

23 A It's a street and a place called  
24 Serangoon.

25 Q Can someone in India -- I'm sorry. Can

1 P. Raj Trial Testimony held 12-13-12

2 someone in Singapore book travel to India  
3 using Serangoon? Serangoon, the travel  
4 agent?

5 A Uh-huh. Yes, they can book tickets to  
6 India.

7 Q Now, do you use --

8 Well, in your marketing, is the -- in your  
9 market, is your company name ever used  
10 without the logo?

11 A In my marketing, is my company without --  
12 used without the logo? Yes.

13 Q Let me show you what was previously marked  
14 as Opposer's Exhibit 112.

15 Looking at this Opposer's Exhibit 112, do  
16 you recognize the name ekNazar at the  
17 upper left-hand of the page?

18 A Yes, I do.

19 Q And what is ekNazar?

20 A EkNazar is -- it's a kind of service  
21 provider for Indian communities in United  
22 States.

23 Q And looking at or in the middle of the  
24 page, where it says featured, do you see  
25 that?

1 P. Raj Trial Testimony held 12-13-12

2 A Yes.

3 Q And that is a representation of an  
4 advertisement your company paid for;  
5 correct?

6 A Yes, correct.

7 Q And it says, quote, online cheap flight  
8 sale, airfare to India, and then it has  
9 your phone number; correct?

10 A Correct.

11 Q And then it says Citiairtravel.com?

12 A Correct.

13 Q Then what is the date there, if you know?

14 A October 30th, 2012.

15 Q Now, looking over on this same page on the  
16 right-hand about halfway down, there's a  
17 reference to Citibank Instant NRI A/C.  
18 Do you see that?

19 A Yes.

20 Q Do you know what that's a reference to?

21 A This looks like paid advertisement,  
22 Pay-Per-Click.

23 Q Do you know who it's a paid advertisement  
24 for?

25 A I'll say Citibank Instant NRI A/C.

1 P. Raj Trial Testimony held 12-13-12

2 Q Do you know what entity is sponsoring this  
3 ad?

4 A I do not know who placed those ads.

5 Q Do you know what NRI stands for?

6 A Yes, I do.

7 Q And what is that?

8 A Nonresident Indian.

9 Q And do you know what that phrase refers  
10 to, nonresident Indian?

11 A Nonresident Indians are technically who  
12 are away from India, who are citizens of  
13 India, for 180 days. Some number of days,  
14 I'm not sure how many days, away from  
15 India.

16 Q Are you a licensed travel agent?

17 A I'm a registered travel agent, but I'm not  
18 sure what it mean by licensed.

19 Q To your knowledge, you haven't -- you or  
20 your wife haven't personally applied to  
21 any government agency to be licensed as a  
22 travel agent; is that correct?

23 A Yes, that's correct.

24 Q Do you from time to time receive mailings  
25 from credit card companies trying to get

1 P. Raj Trial Testimony held 12-13-12

2 you to subscribe to their credit card?

3 A Recently, I don't get those because I opt  
4 out most of them. So I don't get those  
5 e-mails -- e-mails or mails?

6 Q No, I'm talking about regular mails that  
7 come through the postal office.

8 A I do not get those mails.

9 Q You do not?

10 A I do not get those mails.

11 Q Have you ever heard of a service called  
12 the rupee checking account offered in the  
13 United States?

14 A No.

15 MR. PLEVAN: We'll take a  
16 short break.

17 (At which time, 11:49 A.M.,  
18 there was a pause in the proceedings  
19 until 11:53 A.M., at which time the  
20 proceedings resumed.)

21 BY MR. PLEVAN:

22 Q The bank account that you have in India,  
23 what's the name of the bank?

24 A I have two bank accounts. One is from  
25 ICICI Bank.

1 P. Raj Trial Testimony held 12-13-12

2 Q Yes. And the other one?

3 A HDFC Bank.

4 Q And how do you get money to those banks  
5 from the United States?

6 A I go to ICICI and go to their banking  
7 services, and they have NRA services on  
8 ICICI, and I'll just use their service  
9 money to India and just transfer money to  
10 them.

11 Q And there's a branch of ICICI near where  
12 you live?

13 A No.

14 Q Where?

15 A No, no. There's none here.

16 Q When you say you go to them?

17 A Go to them, go online, ICICI online, bank  
18 online.

19 Q How do you get the money, then, to them?

20 A They have ACH transfer from my Bank of  
21 America, and they withdraw money from my  
22 account and send it there.

23 Q In what city is the bank located in India,  
24 ICICI?

25 A That's where my father lives, a town

1 P. Raj Trial Testimony held 12-13-12

2 called N-A-G-E-R-C-O-I-L.

3 Q And the HDFC account, you get money to  
4 that account the same way?

5 A At the same way.

6 Q And where is that located in India?

7 A The branch I'm having is in Chennai,  
8 C-H-E-N-N-A-I.

9 MR. PLEVAN: No further  
10 questions.

11 FURTHER EXAMINATION

12 BY MR. SWYERS:

13 Q I'd like to direct your attention back to  
14 Opposer's Exhibit 13020, which you spoke  
15 about a minute ago with counsel.

16 In the center of this page that counsel  
17 has given to you, do you see a green bar?

18 A Search for key word Citiair.

19 Q What, if anything, do you know about  
20 Pay-Per-Click advertising?

21 A I know pretty little about that. If  
22 anybody uses Citiair, it populates.

23 Q Okay. So this is -- these paid ads on the  
24 right come up as a result of someone  
25 searching specifically for the term

1 P. Raj Trial Testimony held 12-13-12

2 Citiair; correct?

3 A Search for key word Citiair.

4 Q Okay. So from your understanding, the  
5 people whose ads appear on the right are  
6 bidding on your trademark; is that  
7 correct? As a key word?

8 MR. PLEVAN: Object to the  
9 form of the question.

10 BY MR. SWYERS:

11 Q You can answer.

12 A That's populated based on Citiair.

13 Q Right. So if their ads show up when you  
14 search Citiair, they're instructing  
15 whatever ad service this is to show their  
16 ads when they search -- when somebody  
17 searches for your trademark; correct?

18 MR. PLEVAN: Object to the  
19 form of the question.

20 BY MR. SWYERS:

21 Q You can answer.

22 A Correct.

23 Q Okay. You're familiar generally with this  
24 website?

25 A Yes, I'm very familiar with this website.

1 P. Raj Trial Testimony held 12-13-12

2 Q But you're not familiar with this  
3 particular search; correct?

4 A I'm not familiar with this search.

5 Q Do you have any idea who ran this search?

6 A I'm not sure about who.

7 Q Do you know when it was run?

8 A It ran 8/1/2012, it looks like they signed  
9 this paper.

10 Q Do you know who does Citigroup's  
11 purchasing for their Pay-Per-Click  
12 advertising?

13 A I'm not sure who purchase for Citigroup.

14 Q Okay.

15 A I'm not sure about that.

16 Q Okay.

17 MR. SWYERS: I have no  
18 further questions on this.

19 MR. PLEVAN: We're done.

20 MR. SWYERS: Congratulations.

21

22 (Whereupon, the Deposition  
23 of PRAKASH RAJ concluded at 11:58  
24 A.M.)

25

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This is the Deposition of  
PRAKASH RAJ  
taken in the matter, on the date, and at the  
time and place set out on the title page hereof.

It was requested that the deposition be taken by  
the reporter and that same be reduced to  
typewritten form.

It was agreed by and between counsel and the  
parties that the Deponent will read and sign the  
transcript of said deposition.

ACKNOWLEDGMENT OF DEPONENT

I have read the foregoing transcript of my deposition and except for any corrections or changes noted on the errata sheet, I hereby subscribe to the transcript as an accurate record of the statements made by me.

*J. Raj*

PRAKASH RAJ

SUBSCRIBED AND SWORN before and to me this 25 day of February, 2013.

*Jeanette Beard*

NOTARY PUBLIC

Commission expires:

JEANETTE BEARD  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 011BE6194583  
Qualified in Saratoga County  
My Commission Expires October 05, 2018

**CITIGROUP, INC. -VS- CITIAIR, LLC**

**WITNESS: PRAKASH RAJ**

**DATE: DECEMBER 13, 2012**

**EXHIBITS# 1**



**VERITEXT REPORTING COMPANY  
1250 BROADWAY, SUITE 2400  
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**RAJ 1**  
**(Defendant's Exhibit 1)**

1. Prakash Raj

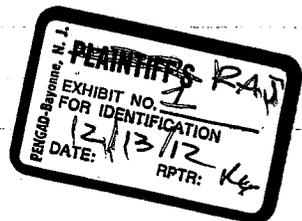
2. Vinayagar

3. சித்ரேஸ் Citi air

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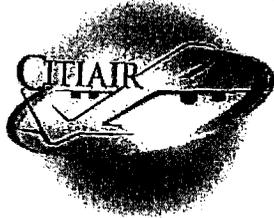
5. எஸ், எஃச்,  
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6. Siti



**Exhibit 1**  
**(Registrant's Exhibit 1)**

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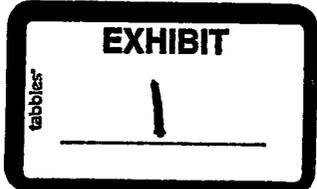
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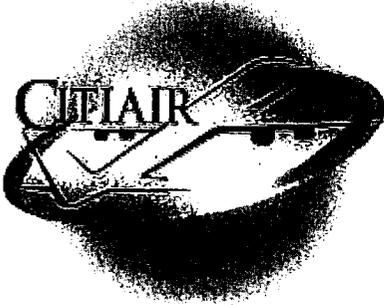
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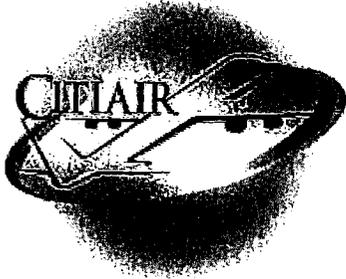
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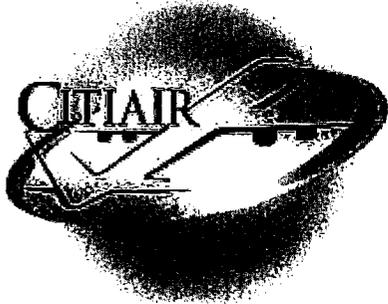
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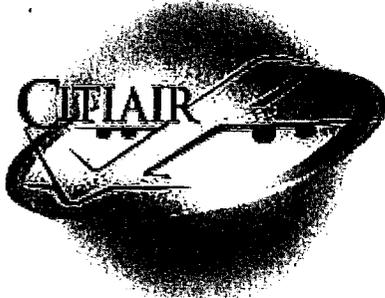
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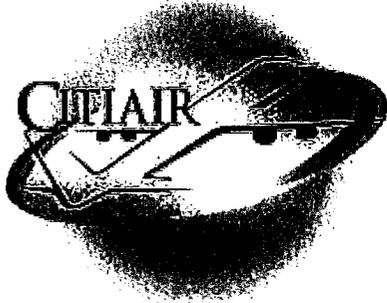
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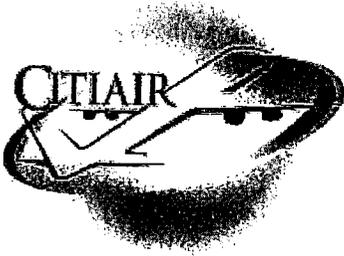
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Passport number:

Country of issue:

Passport expiration date:

Date of birth:

Gender:

**Passenger 2:**

Passenger name as on the passport: (Last name/First name)

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Passport expiration date:

Date of birth:

Gender:

**Passenger 3:**

Passenger name as on the passport: (Last name/First name)

Passport number:

Country of issue:

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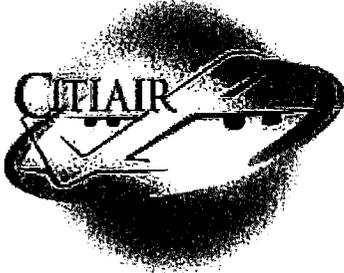
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To: CitiAir LLC Please send signed fax to 1-914-798-2580 along with Creditcard front and back and govt issue id



I , (Credit card holder's Name) request CitiAir Travel to make the following date changes noted below and authorize CitiAir to charge the amount listed below.

- CitiAir Traval is not responsible for seat assignment, Frequent Flyer numbers, meal preference or VISA REQUIREMENTS of any kind.
- If your ticket is refundable or changeable, it must be canceled more than 24 hours before departure to be eligible for refund or date changes

**\*\*Please check your itinerary for name spellings. We do not use this page for spelling corrections\*\*\***

Names of Passengers:(Last Name / First Name)

1. <input type="text"/>	2. <input type="text"/>
3. <input type="text"/>	4. <input type="text"/>

If passengers are not flying on same dates as each other, please fill out separate forms for each passenger.

Airline

Departure Date changed From : MM  DD  YY  To: MM  DD  YY

Return Date changed From : MM  DD  YY  To: MM  DD  YY

Cardholder Name(s)

Email Address

Cardholder Phone (W)

Cardholder Phone (H)

Credit Card Type  (No Debit Cards or Corporate cards)

Credit Card Number

Expiry Dt:

Total amount to be charged \$  Add \$15 if you need courier service.  
Not applicable for E-tickets

**Billing Address**

Add.

City

State

ZipCode

Issuing Bank

Bank Customer Service phone #

Please send a copy of your credit card front and back \*lighten copy please

Yours truly

Signature here: x \_\_\_\_\_ Date: \_\_\_\_\_

Please sign and fax along with credit card front and back, and govt. issued Id ex. Drivers license to 1-914-798-2580



**By submitting/printing I/We accepts the terms and conditions**



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Refund/Cancellation form

\*\*\*Fill out this form only if you have been instructed to by Citifair Travel agent\*\*  
Please fill the form and click on print. Once after printing please sign and fax this form  
To: Citifair LLC Fax No: (914) 798-2580

From:

YOU MUST RETURN YOUR TICKETS TO Citifair Travel

	Name of the Passenger	Ticket Number	Airline
1.	<input type="text"/>	<input type="text"/>	<input type="text"/>
2.	<input type="text"/>	<input type="text"/>	<input type="text"/>
3.	<input type="text"/>	<input type="text"/>	<input type="text"/>
4.	<input type="text"/>	<input type="text"/>	<input type="text"/>
5.	<input type="text"/>	<input type="text"/>	<input type="text"/>

When was it issued:

How much was paid for each ticket: \$

What mode of payment:

Reason for cancelling:

- Refunds may take up to Ten(10) weeks depending on the airline.
- Penalty for the above ticket(s) is: \$375 per ticket
- I am aware of the penalty and authorize Citifair Travel to cancel my reservation.
- If your ticket is refundable or changeable, it must be canceled more than 24 hours (working day(s)) before departure to be eligible for refund or date changes

Please mail my check to (if cash/check payment made) :

Home Phone No:

Work Phone No:

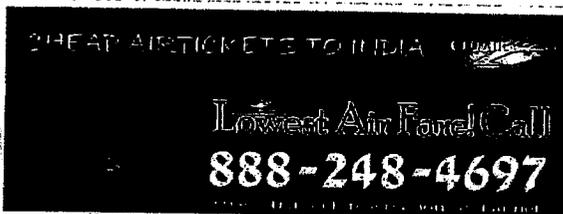
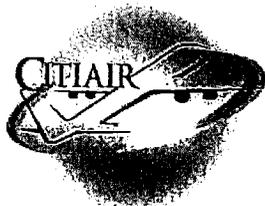
Sign here before faxing:

I am aware that my ticket may only be valid for 6 months to one year from the date of issue and all travel may need to be completed within 6 months to one year from the date of issue of this ticket(s).

Signature: X \_\_\_\_\_ Date: \_\_\_\_\_



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electronic check payment

Electronic Check payment authorization

From (Name): Account holder name
To: CitiAir LLC Send signed PDF copy to fax@citiAir.net or fax to

I, Account holder name request CitiAir to issue the tickets below and authorize CitiAir to charge my account electronically (ACH Transfer) for the amount listed below. I am aware that the cancellation fees are from \$375 to non refundable and date changes are from \$375 and up. This is to confirm, in accordance with all the applicable laws, that I'm instructing CitiAir LLC to issue the tickets against the account number listed below.

CitiAir is not responsible for seat assignment, Frequent Flyer numbers, meal preference or VISA REQUIREMENTS of any kind

1. Account holder name as it appears on the check: Account holder name

2. Routing/ABA No:

3. Account number:

4. Check number:

5. Check amount :\$

6. Billing address including Zip Code:

Street: Street address 1 Street address 2

City: City State: AK - Alaska Zip: 12084

7. Account holder Phone number:

8. Is the account holder paying for more than one purchase? Yes No

9. Name(s) of other passenger(s):

1. Pax 1 2. Pax 2 3. Pax 3
4. Pax 4 5. Pax 5 6.
Pax 6 7. Pax 7 8.
Pax 8

Please send a copy of your check front and back along with your driver license. (\*lighten copy)

Yours truly,

Signature here: X Date:

Sign here before faxing



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## Terms and conditions

### General Terms and conditions

1. All Fares listed in here are subject to availability
2. Fares are Subject to change without notice
3. Prices are only guaranteed if booked and purchased on the same day
4. Please reconfirm your tickets 3 days before the travel date with the airline directly. Failure to do so may result in automatic cancellation of all continuing and return reservation
5. Some airlines' tickets are non-refundable but can be changed to higher fare
6. Tickets issued may have restrictions, non-refundable/refundable, change fee and penalties apply.
7. Check visa requirements with the consulate
8. Involuntary schedule changes or flight cancellation initiated by the airline are not the responsibility of Citair Travel though we will try our best to re-accommodate.
9. Be advised that penalties apply for changes and refunds. Check with your Citair® Travel consultant before purchasing your tickets.
10. Penalties are from \$375 to non-refundable per ticket
11. Change for return is allowed for a penalty of \$275 and up depending upon the airline
12. Credit card fees are additional depending upon airline
13. No refunds on lost tickets. No refund on partially used tickets.
14. Citair® Travel are not responsible for cancellations of flights, re-schedule of flights by airlines.
15. Citair® Travel not responsible for seat assignment, bassinet, frequent flyer numbers, meal preferences or visa requirements of any kind.
16. Please confirm with airline about the baggage allowance & restriction
17. Additional charges for shipping.

### LIMITATION OF LIABILITY

In no event shall Citair® Travel or third party distributors or providers be liable for any injury, loss, claim, damage or any special, exemplary, punitive, incidental or consequential damages of any kind (including but not limited to lost profits or lost savings), whether based in contract, tort or otherwise, which (a) arises out of or is in any way connected with any use of this site or content found herein, (b) any failure or delay (including but not limited to the use of or inability to use any component of this site for reservations request, information inquiries or any other content obtained through this site), or (c) the performance or non performance of Citair LLC or third party distributors or providers, even if such party has been advised of the possibility of such damages by other party. Some states do not allow the exclusion of implied warranties or the limitation or exclusion of liability for incidental and consequential damages so the above exclusion may not apply to you. If, notwithstanding the foregoing, Citair LLC or any third party provider or distributor should be found liable for any loss or damage which arises out of or is in any way connected with any of the above described functions or uses of this site or its content, Citair LLC and third party provider and distributor's liability shall in no event exceed, in the aggregate, the subscription fee and service charge for accessing this site with respect to which liability is found. In its sole discretion, in addition to any other rights or remedies available to Citair LLC and without any liability whatsoever, Citair LLC at any time and without notice may terminate or restrict your access to any component of this site. The foregoing terms and conditions shall apply to both contract and negligence claims.

### RESERVATIONS

Reservations are subject to space availability in the appropriate class, at the time of booking. Please use our [reservation request](#) or our online booking engine to for reservation.

#### **ONLINE FARE RESERVATIONS**

The conditions herein and the conditions as mentioned in the online reservation section apply to all bookings. In the event that more than one set of conditions apply to the same trip then the most restrictive conditions of both sets apply to the entire journey.

#### **PAYMENT BY CHECKS**

Payment by check must be by Banker's check received by us within three days of booking and certainly one day prior to any deadline and option given by us or by the carrier.

#### **CREDIT CARD BOOKING**

Your authorization to use your Credit Card number for deposits and/or final payment indicates your acceptance of our booking terms and conditions, whether or not you have actually signed the appropriate draft. The credit card used must belong to one of the passengers in the reservation. Third party Credit Cards will absolutely not be accepted.

If the airline does not accept payment by Credit Card and you wish to use our Merchant services a fee of 4% will be charged to you for that use. Passenger will be responsible for any charge backs on credit cards.

#### **TICKETS**

Tickets will be issued in accordance with the rules established by the airlines and indicated in the fare rules.

#### **CANCELLATION & REFUNDS**

All participants have the right to cancel subject to cancellation fees. All requests for refunds must be made in writing to Citlair LLC. All cancellations are subject to an administrative fee plus any applicable airline cancellation charges.

#### **PRICES**

All prices quoted are in US dollar, and are subject to change without notice.

#### **DOCUMENTS**

A valid passport and/or proof of citizenship and travel documents are required for trans-border/international travel. Your failure to secure valid travel documents will not create a right of cancellation or refund. You may require visas to the county you are traveling to. Please check the requirements with the country's Embassy or Consulate nearest to you. One parent traveling with a child may have to produce an affidavit signed by the other parent authorizing the child to travel.

Under new security regulations, passenger must supply Passport number, Date of birth and telephone number at the time of reservations or ticketing.

#### **CAR RENTAL**

The client is solely responsible for complying with driving laws applicable in the countries where the client will use the rented car. Value added tax and optional additional insurance may not be included in prices.

#### **BAGGAGE**

Please confirm with airline about the baggage allowance & restriction

#### **FLIGHT TIMES**

Schedules are subject to change without notice. It is therefore the responsibility of passengers to reconfirm flight times as instructed. The Operator assumes no responsibility to the passenger for any loss, delay, or other inconveniences incurred in connection with any flights. All passengers must arrive at the airport a minimum of two hours before the indicated departure time.

#### **TAXES**

Airport and other departure taxes, as well as US transportation taxes are not included in the cost of the packages.

#### **MODIFICATION**

Citlair LLC may at any time modify these terms and conditions and your continued use of this site will be conditioned upon the terms and conditions in force at the time of your use.

#### **ADDITIONAL TERMS**

Additional terms and conditions may apply to information gathering, reservations; related services and other uses of portions of this site, and you agree to abide by such other terms and conditions.

**SEVERABILITY**

These terms and conditions shall be deemed severable. In the event that any provision is determined to be unenforceable or invalid, such provision shall nonetheless be enforced to the fullest extent permitted by applicable law, and such determination shall not affect the validity and enforceability of any other remaining provisions.

**HEADINGS**

The heading used in these Terms and Conditions are included for convenience only and will not limit or otherwise affect these Terms and Conditions.

**ACCEPTANCE**

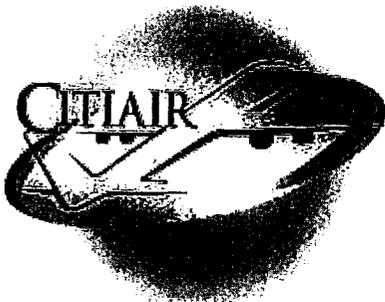
The acceptance of tickets and or vouchers shall be deemed to be consent to the above conditions.

**ERRORS**

All documents must be checked by passenger and reported to Citiair within 8 hours of receipt. Citiair will not be responsible for errors not brought to its attention within that period.

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### Airline Contact

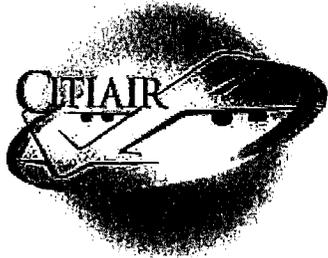
Airline	Contact Number
ATA American Trans Air	800-435-9792
Atkin Air	800-924-2471
Atlantic Airlines	800-879-0000
AtlasAir	914-701-8000
Austrian Airlines	800-843-0002
Aviacsa	866-246-0961
Bahamas Air	242-377-8451
Bangkok Air	66 (02) 265 5678
Braathens	47 915 05 400
British Airways	800-247-9297
British Midland	800-788-0555
BWIA International	868 625 7200
Calm Air	800-839-2256
Canadian North	800-661-1505
CanJet	888-201-2289
Cape Air	800-352-0714
Cathay Pacific Airways	800 -233-2742
Cayman Airways	800-422-9626
China Airlines	800-2275-118
China Southern Airlines	8620-95539
Colgan Air	703-368-8880
Comair	800-727-2550
Continental Airlines	800-523-3273
Copa Airlines	800-359-2672
Croatia Airlines	385 1 487 27 27
Delta Air Lines	800-847-0578
East Coast Services	800-554-0550
EgyptAir	212- 581 5600?

El Al Israel Airlines	03-971-7322
Emirates Air	800 -777- 3999
Ethiopian Airlines	703 572 6809
EVA Airways	800-695-1188
Evergreen Int	503-472-9361
Finnair	800-950-5000
Frontier Airlines	800-432-1359
Garuda Indonesia	212-279-0756
Great Lakes Airlines	800-554-5111
Gulf Air	888-359-4853
Gulfstream Airlines	800-523-3273
Hawaiian Airlines	800-367-5320
Horizon Air	800-252-7522
Iberia	800-772-4642
Icelandair	800-223-5500
Japan Airlines	800-525-3663
Jazz (Air Canada)	866-222-6686
JetBlue Airways	800-538-2583
Kenya Airways	866-536-9224
KLM	800-225-2525
Korean Air	800-438-5000
Kuwait Air	800-458-9248
Lacsa	800-400-8222
Lan Chile Airlines	866-435-9526
Lauda	800-843-0002
Lithuanian Airlines	370 5 2525555
LOT Polish	212-789-0970
LTU International	866-266-5588
Lufthansa	800-399-5838
Lynx Air	888-596-9247
Malev Hungarian	361- 235-3888
Martinair	305 -704 -9800
Mesa Airlines	800 -552- 9264
Mesaba Airlines	651-367-5000
Midwest Express Air	800-452-2022
Nantucket Airlines	800-352-0714
Northwest Airlines	800-225-2525
Pacific Coastal Air	800-663-2872
Pacific Wings	888-575-4546
Pakistan Intl. Air	800-578-6786
Penair	800- 448-4226
Philippine Airlines	800-747-1959
PIA Pakistan	800-578-6786
Polynesian Airlines	684-699- 9126

Qantas Airways	800-227-4500
Qatar Air	877-777-2827
Royal Jordanian Air	800-223-0470
Scandinavian Air	800-221- 2350
Saudi Arabian Air	800-472-8342
Scenic Airlines	800-634-6801
Shuttle America	317-484-6000
Silk Air	800-224-4243
Singapore Airlines	800-742-3333
SN Brussels	516-740-5200
Solomon Airlines	800-677-4277
South African	800-722-9675
Southwest Airlines	800-435-9792
Spanair	888-545-5757
Spirit Airlines	800-772-7117
Sun Country Airlines	800-359-6786
Suriname Airways	800-327-6864
Swiss	877-359-7947
TACA Airlines	800-400-8222
TED	800-864-8331
Travelair	888-535-8832
Tropic Air	800-422-3435
Turkish Airlines	800-874-8875
Ukraine Intl Airlines	800-876-0114
United Airlines	800-864-8331
US Airways	800-622-1015
USA 3000	877-872-3000
Virgin Atlantic	866 258 0951
WestJet Airlines	888-937-8538
World Airways	800-967-5310
Zip Air	888-247-2262

<!--[if !supportEmptyParas]--> <!--[endif]-->

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Showing: 1-1 of 1

**Sabina said:** July 29th, 2009 10:50 pm

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Name:

Email:

Message:

**Justice** **thorsm**

Enter the two words above:

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Fare quote/ Reservation request

Secure Site

Fare Quote / Reservation request form

Please complete the fields below and we will respond to your inquiry within 12 hours during office hours.  
 OFFICE HOURS: MON-FRI 9.00AM to 6.30 PM EST; SAT 10 AM to 5.00PM EST  
 PLEASE PROVIDE FULL NAME AS IN PASSPORT FOR FASTER SERVICE. TSA require DOB for all reservation.  
 Please provide exact DOB.

Primary Passenger: \*

Last Name	First Name	Middle
<input type="text"/>	<input type="text"/>	<input type="text"/>

DOB:

From City:

To City:

Depart:

Return:

Whom to Thank for referring you:

Flexible with travel dates

No

Yes

Other departure(s):

Other return date(s):

Other Date(s) optional:

Adult(s):

Children:

Infant:

Other Passenger(s) Name:

- 
- 
- 
- 

Email:

alternate email:

Telephone:

Comments:

Security Code:

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#### USA:

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 (1888-2484697)  
 Tel: 909-CITIAIR™ (909-248-4247)  
 Fax: 1-914-798-2580  
 email: reservation@citiair.net  
 Address: Tyler Ct, Guilderland, NY

#### Hours of Operation:

**Mon-Fri 9.00 AM to 9.00 PM EST**

**Sat 11.00-5.30 EST**

#### Singapore:

Serangoon Air Travel Pvt. Ltd.  
 Tel: (65) 65917165  
 Fax: (65) 62971884  
 Address: Serangoon Air Travel,  
 Little India Arcade, 48, Serangoon Road,  
 #01-22, Visa Department,  
 #01-69, Ticketing Office,  
 Singapore 217959

**Exhibit 2**  
**(Registrant's Exhibit 2)**



Toll Free : 888.248.4697 



Flight

Resources

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Round-Trip  One-Way  Multi-City

Flight 1

From  To   
 Airport or City Airport or City  
 80 miles radius search  80 miles radius search  
 Jun 30 2012 Anytime  
 +/- 1 Day Search

Flight 2

From  To   
 Airport or City Airport or City  
 80 miles radius search  80 miles radius search  
 Jul 4 2012 Anytime  
 +/- 1 Day Search

Travelers

Adults (12+) Children (2-11) Infants (Under 2)

Options

Cabin  Economy / Coach  
 Airline  No Preference



EXHIBIT

2

tabbles

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- Super Low First and Business Class Airfares
- Lowest Airfare Guaranteed
- Best in Class Service
- Super Cheap Flights to India
- Your Indian Travel Agent in USA



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 Name



## Quick Quote

Low Unpublished Low Airfares-Please give your full name as per passport. All quotes valid only with full name(s) and no name change allowed

Last name: \*

First name: \*

Onward Date (MM/DD/YY): \*

From (Depart) City: \*

Return Date (MM/DD/YY): \*

To (Return) City: \*

Contact Phone: \*

[Sign up!](#)

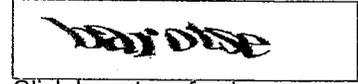
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Email: \*

Other Remark:



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Round-Trip  One-Way  Multi-City

Flight 1

From  To   
 Airport or City Airport or City  
 80 miles radius search  80 miles radius search  
 Jun 30 2012 Anytime

+/- 1 Day Search

Flight 2

From  To   
 Airport or City Airport or City  
 80 miles radius search  80 miles radius search  
 Jul 4 2012 Anytime

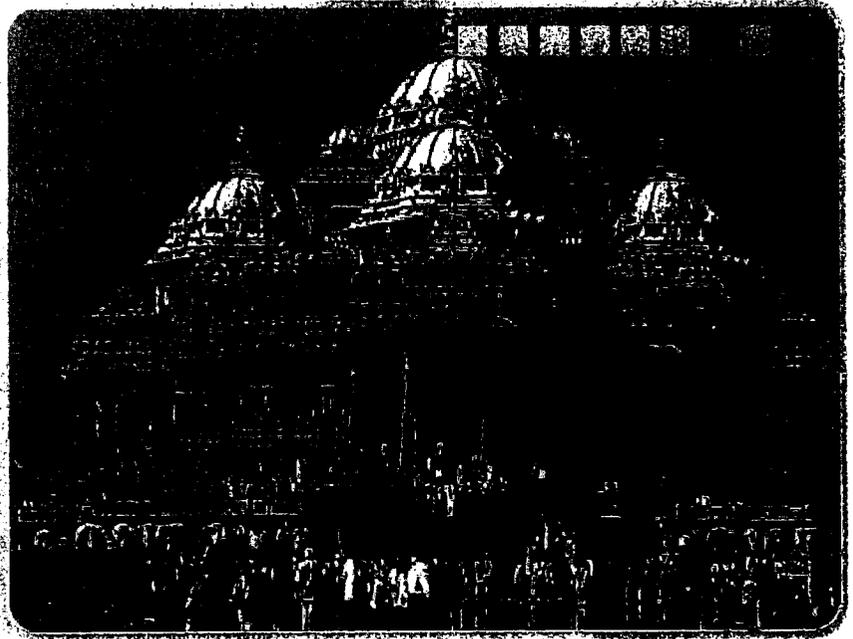
+/- 1 Day Search

Travellers

Adults (12+) Children (2-11) Infants (Under 2)

Options

Cabin  Economy / Coach  
 Airline  No Preference



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  - \* Chicago to India
  - \* Flights to Chennai
  - \* Washington to India
  - \* Flights to Hyderabad
- \* Boston to India
  - \* Flights to Ahmedabad
  - \* Los Angeles to India
  - \* Flights to Bangalore
  - \* Houston to India
  - \* Flights to Goa
  - \* Atlanta to India
  - \* Flights to Amritsar
- \* Phoenix to India
  - \* Flights to Kolkata
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Flight 1  
 From  To   
 Airport or City Airport or City  
 80 miles radius search  80 miles radius search  
 Jun 30 2012 Anytime  
 +/- 1 Day Search

Flight 2  
 From  To   
 Airport or City Airport or City  
 80 miles radius search  80 miles radius search  
 Jul 4 2012 Anytime  
 +/- 1 Day Search

Travellers  
 Adults (12+) Children (2-11) Infants (Under 2)  
 1  0  0

Options  
 Cabin Economy / Coach  
 Airline No Preference

### RESOURCES

#### FORMS

- [Terms and conditions](#)
- [Ticket order form](#)
- [Date Change form](#)
- [Cancellation form](#)
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#### CONTACTUS

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 Fax: 1-914-7982580  
 email: reservation@citiair.net  
 Hours of Operation:  
 Mon-Fri 9.00 AM to 9.00 PM EST  
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 Serangoon Air Travel Pvt. Ltd.  
 Tel: (65) 65917165  
 Fax: (65) 62971884  
 Address: Serangoon Air Travel,  
 Little India Arcade, 48, Serangoon Road,  
 #01-22, Visa Department,  
 #01-69, Ticketing Office,  
 Singapore 217959



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- Super Low First and Business Class Airfares
- Lowest Airfare Guaranteed
- Best in Class Service
- Super Cheap Flights to India
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Flight 1

From

To

Airport or City

Airport or City

80 miles radius search

80 miles radius search

Jun

30

2012

Anytime

+/- 1 Day Search

Flight 2

From

To

Airport or City

Airport or City

80 miles radius search

80 miles radius search

Jul

4

2012

Anytime

+/- 1 Day Search

Travellers

Adults (12+)

Children (2-11)

Infants (Under 2)

1

0

0

Options

Cabin

Economy / Coach

Airline

No Preference

Search

### TICKET ORDER FORM

In Lieu of My Credit Card Imprint, I \_\_\_\_\_ Hereby Authorize Citiair Travel/SLT/CTS to charge an Amount totaling USD \_\_\_\_\_ I am aware that my credit card may be charged a slightly larger amount than I have authorized due to ticket fare type, but for any overcharge, Citiair Travel will send a refund to me by check within 3 to 5 weeks of ticket issuance from my American

Express / Visa / Master Credit Card No \_\_\_\_\_ CVV: \_\_\_\_\_

\_\_\_\_\_ Expiry \_\_\_\_\_

Credit Card 24 hour Card member Service Tel. #: \_\_\_\_\_

For Transportation for Myself and/or \_\_\_\_\_



1. \_\_\_\_\_ (M/F) \_\_\_\_\_ Date of Birth: \_\_\_\_\_ \*Relationship ( )
2. \_\_\_\_\_ (M/F) \_\_\_\_\_ Date of Birth: \_\_\_\_\_ \*Relationship ( )
3. \_\_\_\_\_ (M/F) \_\_\_\_\_ Date of Birth: \_\_\_\_\_ \*Relationship ( )
4. \_\_\_\_\_ (M/F) \_\_\_\_\_ Date of Birth: \_\_\_\_\_ \*Relationship ( )
5. \_\_\_\_\_ (M/F) \_\_\_\_\_ Date of Birth: \_\_\_\_\_ \*Relationship ( )

For the Following Routing \_\_\_\_\_

ONWARD CITY: \_\_\_\_\_ RETURN CITY: \_\_\_\_\_

I understand that the tickets to be issued may have; restrictions, be non-refundable/refundable, change fees and penalties.

NAMES OF PASSENGERS: PLEASE CHECK YOUR ITINERARY FOR NAME SPELLINGS. WE DO NOT USE THIS PAGE FOR SPELLING CORRECTIONS. FOR ANY NAME CHANGE FARE SUBJECTED TO CHANGE (BASED ON AVAILABILITY) CITIAIR TRAVEL IS NOT RESPONSIBLE FOR BAGGAGE ALLOWANCE, SEAT ASSIGNMENT, BASSINET, WHEEL CHAIR, FREQUENT FLYER NUMBERS, MEAL PREFERENCE OR VISA REQUIREMENTS OF ANY KIND OR WHAT SO EVER.

My Billing Address for the Credit Card used is:

Street: \_\_\_\_\_ City/State: \_\_\_\_\_  
 Zip: \_\_\_\_\_ Home Phone: \_\_\_\_\_ Business Phone: \_\_\_\_\_  
 Fax: \_\_\_\_\_ E-mail: \_\_\_\_\_

**I WILL SUPPORT THIS AUTHORIZATION WITH SCANNED PHOTOCOPIES OF MY CREDIT CARD (FRONT & BACK) AND A FEDERAL ID SUCH AS A DRIVER'S LICENCE OR A PASSPORT.**

BY SIGNING BELOW, I ACKNOWLEDGE FULL LIABILITY FOR THE CHARGE DESCRIBED HEREIN. PAYMENT IN FULL WILL BE MADE WHEN BILLED IN ACCORDANCE WITH STANDARD POLICY OF BANK ISSUING THE CARD. ALSO BY SIGNING I ACCEPT THE TERMS AND CONDITIONS RELATED TO THE BOOKING(S)..

**E-mail or Fax this form back to your sales agent @914-798-2580 or reservation@citiair.net**

SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

**All Form must be received before 5 PM EST for ticketing and no exception(s)**

Fare Quoted Subject to Change without notice and CitiAir not responsible for any fare change

This form contains 2 pages and fax or send both the pages to CitiAir Travel. By signing I /we accept the terms and condition on the following page.



### Terms and conditions

1. PLEASE RECONFIRM ALL FLIGHTS AT LEAST 72 HOURS BEFORE DEPARTURE WITH AIRLINE.
2. All information related to passenger are kept confidential and secure
3. Prices are only guaranteed if booked and purchased on the same day
5. Some airlines' tickets are non-refundable but can be changed to higher fare
6. Tickets issued may have restrictions, non-refundable/refundable, change fee and penalties apply.
7. CHECK VISA AND TRANSIT VISA REQUIREMENTS WITH CONSULATE AND THE AIRLINE BEFORE PURCHASING THE TICKETS.
8. Involuntary schedule changes or flight cancellation initiated by the airline are not the responsibility of CitiAir Travel though we will try our best to re-accommodate.
9. Be advised that penalties apply for changes and refunds. Check with your CitiAir® Travel consultant before purchasing your tickets.
10. Penalties are from \$375 to non-refundable per ticket
11. Change for return is allowed for a penalty of \$275/ticket and up depending upon the airline
12. Credit card fees are additional depending upon airline
13. No refunds on lost tickets. No refund on partially used tickets. IF PASSENGERS DO NOT SHOW UP FOR THEIR FLIGHTS  
NO REFUNDS ARE POSSIBLE.
14. CitiAir® Travel are not responsible for cancellations of flights, re-schedule of flights by airlines.
15. CitiAir® Travel not responsible for seat assignment, bassinet, frequent flyer numbers, meal preferences or visa requirements of any kind.
16. Please confirm with airline about the baggage allowance & restriction
17. Additional charges for shipping.

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FOR EMERGENCY PLEASE LEAVE A VOICEMAIL 1-888-248-4697

All ticket bound by the above conditions.

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Flight 1

From  To   
Airport or City Airport or City

80 miles radius search  80 miles radius search

Jun  30  2012  Anytime

+/- 1 Day Search

Flight 2

From  To   
Airport or City Airport or City

80 miles radius search  80 miles radius search

Jul  4  2012  Anytime

+/- 1 Day Search

Travelers:

Adults (12+) Children (2-11) Infants (Under 2)

1  0  0

Options:

Cabin  Economy / Coach

Airline  No Preference

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Toll Free Call: 888-248-4697  
Travel Company you really love

### DATE CHANGE FORM

To: Citiair LLC Please send signed fax to 1-914-798-2580 along with Creditcard front and back and govt issue id



I  (Credit card holder's Name) request Citiair Travel to make the following date changes noted below and authorize Citiair to charge the amount listed below.

Total Amount (USD):

1. Cardholder's name as it appears on the credit card:

2. Cardholder's billing address including Zip Code

Street:  City:

State:  Zip:

3. Cardholder's phone number:

4. Credit Card Number:

5. Exp. Date:

CVV (at the back of card):

IS THE CARDHOLDER TRAVELING?  Yes  No

IS THE CARHOLDER PAYING FOR MORE THAN ONE PURCHASE?  Yes  No

If yes, then the names of the passengers and their relationship with the cardholder:

Total Amount (if different from the above) in USD:

Departure Date changed From :

To :

Return Date changed From :

To :

Yours truly

Signature here: x \_\_\_\_\_ Date: \_\_\_\_\_

Please sign and fax along with credit card front and back, and govt. issued id ex. Drivers license to **1-914-798-2580**



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Round-Trip  One-Way  Multi-City

Flight 1

From  To   
 Airport or City Airport or City

80 miles radius search  80 miles radius search

Jun 30 2012 Anytime

+/- 1 Day Search

Flight 2

From  To   
 Airport or City Airport or City

80 miles radius search  80 miles radius search

Jul 4 2012 Anytime

+/- 1 Day Search

Travellers

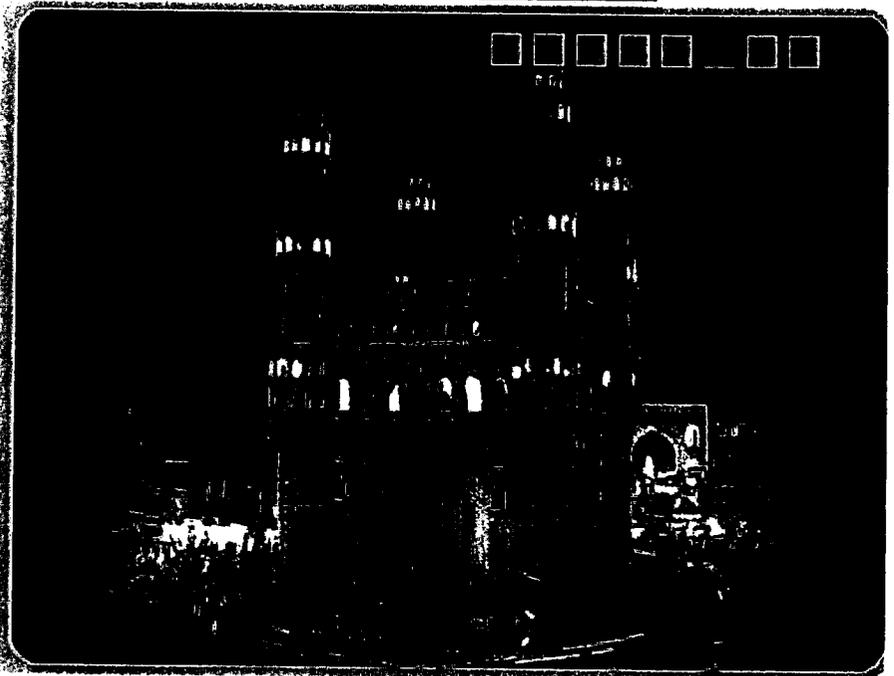
Adults (12+) Children (2-11) Infants (Under 2)

1 0 0

Options

Cabin  Economy / Coach

Airline  No Preference



### TICKET CANCELLATION FORM

In Lieu of My Credit Card Imprint, I  Hereby Authorize **Citair Travel/SLT/CTS** to charge the credit card an amount totaling USD

Credit Card No  CVV:  Expiry

Credit Card 24 hour Card member Service Tel. #:

- Refunds may take up to Ten(10) weeks depending on the airline.
- Penalty for the above ticket(s) is: \$375 per ticket
- I am aware of the penalty and authorize Citair Travel to cancel my reservation.
- If your ticket is refundable or changeable, it must be canceled more than 24 hours (working day(s)) before departure to be eligible for refund or date changes

For Tancellation for Myself and/or

1.  (M/F)  Date of Birth:  \*Relationship ( )

2.  (M/F)  Date of Birth:  \*Relationship ( )

3.  (M/F)  Date of Birth:  \*Relationship ( )

4.  (M/F)  Date of Birth:  \*Relationship ( )

5.  (M/F)  Date of Birth:  \*Relationship ( )

My Billing Address for the Credit Card used is:

Street: \_\_\_\_\_ City/State: \_\_\_\_\_  
 Zip: \_\_\_\_\_ Home Phone: \_\_\_\_\_ Business Phone: \_\_\_\_\_  
 Fax: \_\_\_\_\_ E-mail: \_\_\_\_\_

**I WILL SUPPORT THIS AUTHORIZATION .**

BY SIGNING BELOW, I ACKNOWLEDGE FULL LIABILITY FOR THE CHARGE DESCRIBED HEREIN. PAYMENT IN FULL WILL BE MADE WHEN BILLED IN ACCORDANCE WITH STANDARD POLICY OF BANK ISSUING THE CARD.

***E-mail or Fax this form back to your sales agent @914-798-2580 or reservation@citifair.net***

SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_



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Flight 1  
 From:  To:   
 Airport or City  Airport or City  
 80 miles radius search  80 miles radius search  
 Jun 30 2012 Anytime  
 +/- 1 Day Search

Flight 2  
 From:  To:   
 Airport or City  Airport or City  
 80 miles radius search  80 miles radius search  
 Jul 4 2012 Anytime  
 +/- 1 Day Search

Travellers:  
 Adults (12+)  Children (2-11)  Infants (Under 2)   
 1 0 0

Options:  
 Cabin:  Economy / Coach  
 Airline:  No Preference



### BACKUP TICKET ORDER FORM

In Lieu of My Credit Card Imprint, I  Hereby Authorize **Citair Travel** to issue the tickets below and authorize Citair Travel/ SLT / CTS to charge mycredit card for the amount listed below in the event that my other form of payment is not received within 2 business days of the date on this form. I am aware that Citair Travel will take an "authorization" on my credit card for the amount on this form, but the card will only be charged in the event that I do not make some other form of payment within 2 days of the date on this form. This "authorization" on the credit card will be active for a period of 15 business days. I am aware that all tickets are non refundable. I am aware that outbound date changes before departure date are \$375 USD plus any applicable fare and tax differences. I am aware return date changes are \$375 USD plus any applicable fare and tax differences. I am also aware that the airline that I am purchasing may not accept credit cards so it may not be possible for me to receive any additional benefits or insurance offered by my credit card company.

**Citair Travel is not responsible for seat assignment, Frequent Flyer numbers, meal preference or VISA REQUIREMENTS of any kind.**

Credit Card No  CVV:  Expiry  /

Credit Card 24 hour Card member Service Tel. #:

For Transportation for Myself and/or

Relationship:  (M/F)  Date of Birth:  \*Relationship ( )

1.  (M/F)  Date of Birth:  \*Relationship ( )

2.  (M/F)  Date of Birth:  \*Relationship ( )

3.  (M/F)  Date of Birth:  \*Relationship ( )

4.  (M/F)  Date of Birth:  \*Relationship ( )

5. \_\_\_\_\_ (M/F) \_\_\_\_\_ Date of Birth: \_\_\_\_\_ \*Relationship ( )

For the Following Routing \_\_\_\_\_

ONWARD CITY: \_\_\_\_\_ RETURN CITY: \_\_\_\_\_

I understand that the tickets to be issued may have; restrictions, be non-refundable/refundable, change fees and penalties.

NAMES OF PASSENGERS: PLEASE CHECK YOUR ITINERARY FOR NAME SPELLINGS. WE DO NOT USE THIS PAGE FOR SPELLING CORRECTIONS. FOR ANY NAME CHANGE FARE SUBJECTED TO CHANGE (BASED ON AVAILABILITY) CITIAIR TRAVEL IS NOT RESPONSIBLE FOR BAGGAGE ALLOWANCE, SEAT ASSIGNMENT, BASSINET, WHEEL CHAIR, FREQUENT FLYER NUMBERS, MEAL PREFERENCE OR VISA REQUIREMENTS OF ANY KIND OR WHAT.SO EVER.

My Billing Address for the Credit Card used is:

Street: \_\_\_\_\_ City/State: \_\_\_\_\_

Zip: \_\_\_\_\_ Home Phone: \_\_\_\_\_ Business Phone: \_\_\_\_\_

Fax: \_\_\_\_\_ E-mail: \_\_\_\_\_

**I WILL SUPPORT THIS AUTHORIZATION WITH SCANNED PHOTOCOPIES OF MY CREDIT CARD (FRONT & BACK) AND A FEDERAL ID SUCH AS A DRIVER'S LICENCE OR A PASSPORT.**

BY SIGNING BELOW, I ACKNOWLEDGE FULL LIABILITY FOR THE CHARGE DESCRIBED HEREIN. PAYMENT IN FULL WILL BE MADE WHEN BILLED IN ACCORDANCE WITH STANDARD POLICY OF BANK ISSUING THE CARD. ALSO BY IGNING I-ACCEPT THE TERMS AND CONDITIONS RELATED TO THE BOOKING(S)..

**E-mail or Fax this form back to your sales agent @914-798-2580 or reservation@citiair.net**

SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

**All Form must be received before 5 PM EST for ticketing and no exception(s)**

Fare Quoted Subject to Change without notice and CitiAir not responsible for any fare change

This form contains 2 pages and fax or send both the pages to CitiAir Travel. By signing I /we accept the terms and condition on the following page.

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1. PLEASE RECONFIRM ALL FLIGHTS AT LEAST 72 HOURS BEFORE DEPARTURE WITH AIRLINE.
2. All information related to passenger are kept confidential and secure
3. Prices are only guaranteed if booked and purchased on the same day
5. Some airlines' tickets are non-refundable but can be changed to higher fare
6. Tickets issued may have restrictions, non-refundable/refundable, change fee and penalties apply.
7. CHECK VISA AND TRANSIT VISA REQUIREMENTS WITH CONSULATE AND THE AIRLINE BEFORE PURCHASING THE TICKETS.
8. Involuntary schedule changes or flight cancellation initiated by the airline are not the responsibility of CitiAir Travel though we will try our best to re-accommodate.
9. Be advised that penalties apply for changes and refunds. Check with your CitiAir@ Travel consultant before purchasing your tickets.
10. Penalties are from \$375 to non-refundable per ticket
11. Change for return is allowed for a penalty of \$275/ticket and up depending upon the airline
12. Credit card fees are additional depending upon airline
13. No refunds on lost tickets. No refund on partially used tickets. IF PASSENGERS DO NOT SHOW UP FOR THEIR

FLIGHTS

NO REFUNDS ARE POSSIBLE.

- 14. Citair® Travel are not responsible for cancellations of flights, re-schedule of flights by airlines.
- 15. Citair® Travel not responsible for seat assignment, bassinet, frequent flyer numbers, meal preferences or visa requirements of any kind.
- 16. Please confirm with airline about the baggage allowance & restriction
- 17. Additional charges for shipping.

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From  To

Airport or City
  Airport or City

80 miles radius search
  80 miles radius search

Jun
  30
  2012
  Anytime

+/- 1 Day Search

Flight 2

From  To

Airport or City
  Airport or City

80 miles radius search
  80 miles radius search

Jul
  4
  2012
  Anytime

+/- 1 Day Search

Travellers:

Adults (12+)  1
 Children (2-11)  0
 Infants (Under 2)  0

Options:

Cabin  Economy / Coach

Airline  No Preference

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**CHEAP AIR -CITIAIR ONLINE TICKET BOOKING TO INDIA**

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 Fax: 914.798.2580  
 email: [reservation@citiair.net](mailto:reservation@citiair.net)  
 Address: Albany, NY

**Hours of Operation:**

**Mon-Fri 9.00 AM to 8.30 PM EST**  
**Sat 11.00-5.30 EST**

**Singapore:**

Serangoon Air Travel Pvt. Ltd.  
 Tel: (65) 65917165  
 Fax: (65) 62971884  
 Address: Serangoon Air Travel,  
 Little India Arcade, 48, Serangoon Road,  
 #01-22, Visa Department,  
 #01-69, Ticketing Office,  
 Singapore 217959



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- ◆ Lowest Airfare Guaranteed
- ◆ Best in Class Service
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**Exhibit 6**  
**(Registrant's Exhibit 6)**

**OMITTED DUE TO  
CONFIDENTIAL DESIGNATION**

**Exhibit 7**  
**(Registrant's Exhibit 7)**

**OMITTED DUE TO  
CONFIDENTIAL DESIGNATION**

**Exhibit 8**  
**(Registrant's Exhibit 8)**

**OMITTED DUE TO  
CONFIDENTIAL DESIGNATION**