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

Proceeding	91202371
Party	Defendant Jose Alfonso Serrano Gonzalez
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Submission	Opposition/Response to Motion
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Date	07/17/2012
Attachments	OposicionReconsiderar.pdf (2 pages)(85901 bytes)

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

EMBOTELLADORA AGA DEL PACIFICO,
S.A. de C.V.

Opposer,

v.

JOSE ALFONSO SERRANO GONZALEZ,

Applicant.

Opposition No.: 91202371
Application Serial No.: 85149168
Mark: CABALLITO CERRERO
Filed: October 10, 2010
Published: July 5, 2011
Int'l Class: 33

Applicant's Attorney: Refugio Jose
Gonzalez

Commissioner for Trademarks
P.O. Box 1454
Alexandria, Virginia 22313-1451

**APPLICANT'S OPPOSITION TO OPPOSER'S MOTION FOR
RECONSIDERATION**

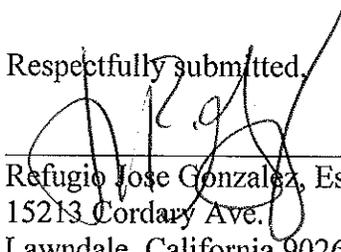
APPLICANT, JOSE ALFONSO SERRANO GONZALEZ ("Applicant"), through his attorneys, hereby opposes EMBOTELLADORA AGA DEL PACIFICO, S.A. DE CV's ("Opposer") motion for reconsideration based on the fact that the Board did not err in reaching its decision in regards to Opposer's motion for summary judgment and Opposer's complete failure to present evidence to met its burden of proof that the Board committed error.

Opposer simply attempts to distinguish certain cases in the Board's ruling but fails to address the evidence considered by the Board in reaching its sound ruling. Accordingly, Opposer simply is rearguing its motion for summary judgment, which is improper in a motion for reconsideration. Applicant will not do the same an regurgitate its opposition to Opposer's motion for summary judgment.

Accordingly, Opposer's motion for reconsideration must be denied.

Dated: July 17, 2012

Respectfully submitted,

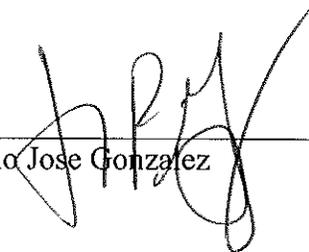


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JOSE ALFONSO SERRANO GONZALEZ

ELECTRONIC FILING CERTIFICATE

I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being submitted electronically through Electronic System for Trademark Trials and Appeal ("ESTTA") on the date shown below:

Dated: July 17, 2012



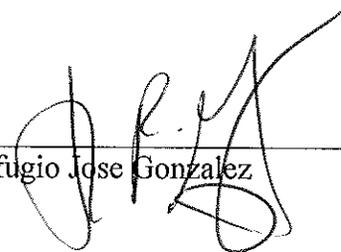
Refugio Jose Gonzalez

CERTIFICATE OF SERVICE

I hereby certify that one (1) copy of this document has been deposited with the United States Postal Service as First Class mail, postage affixed, in an envelope addressed to Opposer's attorneys of record herein as follows:

Michael Martin
Fischbach, Perlstein, Lieberman & Almond, LLP
1925 Century Park East, Suite 2050
Los Angeles, California 90067

Dated: July 17, 2012



Refugio Jose Gonzalez