

ESTTA Tracking number: **ESTTA485495**

Filing date: **07/25/2012**

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

**Notice of Opposition**

Notice is hereby given that the following party opposes registration of the indicated application.

**Opposer Information**

Name	Tiffany (NJ) LLC
Granted to Date of previous extension	07/25/2012
Address	15 Sylvan Way Parsippany, NJ 07054 UNITED STATES

Attorney information	Richard Lehv Fross Zelnick Lehrman & Zissu, P.C. 866 United Nations Plaza New York, NY 10017 UNITED STATES rlehv@frosszelnick.com Phone:2128135900
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**Applicant Information**

Application No	79096573	Publication date	03/27/2012
Opposition Filing Date	07/25/2012	Opposition Period Ends	07/25/2012
International Registration No.	1074900	International Registration Date	12/13/2010
Applicants	Garagnon, Guillaume Francis 18, les Primevères Portes-l'Église-Valence, F26800 FRANCE  Blanc, Olivier 15, rue Adolphe Beaumié Saint-Peray, F07130 FRANCE		

**Goods/Services Affected by Opposition**

Class 014. All goods and services in the class are opposed, namely: Precious metals and their alloys and charms made of or coated with these materials, precious stones, jewelry, chokers, bracelets, rings, earrings, pendants, brooches, badges as jewelry; cuff links, medals, medallions, trinkets, namely, rings, tie clips, tie pins, chains as jewelry, boxes of precious metal, jewelry cases, jewel and watch cases not of precious metal; horological and chronometric instruments, watches and component parts thereof; watches, chronometers, wristwatches, clocks, small clocks, watch straps, watch clasps, watch faces; watch cases, watch chains, movements for clocks and watches, cases for clock- and watchmaking, cases for watches, key rings trinkets or fobs of precious metal; scarf rings being jewelry
Class 035.

All goods and services in the class are opposed, namely: Business management; business administration; office functions; advertising especially advertising by electronic means on global computer networks such as the Internet; advertising by mail order; publicity material rental; leasing of advertising space; dissemination of advertising matter; advertising mailing especially on global computer networks such as the Internet; copywriting and publishing advertising texts; updating of advertising documents; page layout services for advertising; outdoor advertising, namely, presentation and demonstration of goods on all means of communication; sales promotion for others; commercial information and advice to consumers; shop-window dressing including on Internet sites; business management of performing artists; document reproduction; distribution of samples; organization of exhibitions for commercial or advertising purposes; computerized file management; import-export agencies; modeling for advertising or sales promotion; public relations; sponsorship search; news clipping services; business evaluations; business management and organization consultancy; information or enquiries on business and marketing; administrative processing of purchase orders; commercial or industrial management assistance, namely, aid and assistance in the operation, organization or management of a commercial undertaking; business appraisals; compilation of information into computer databases; business information; marketing research; business research; message transcription; retail store services featuring perfumes, perfumery, toilet water, eau de parfum, essential oils for personal use, cosmetics, make-up preparations, hair and body lotions, soap, dentifrices, deodorants for personal use, tissues impregnated with cosmetic lotions, shower gels, shampoos, beauty creams for use on the body, shaving preparations, shaving creams, after-shave lotions, after-shave balms, cosmetic preparations for baths, cosmetic creams, lotions for cosmetic purposes, toiletries, bleaching preparations and other substances for laundry use, preparations for cleaning, polishing and degreasing, cleaning products, oils for cleaning purposes, leather preservatives, leather bleaching preparations, polishing creams, creams for leather, shoe cream, shoe polish, shoe wax, shoemakers' wax, common metals and their alloys, metal building materials, ironmongery and small items of metal hardware, safes, ores, metal fasteners for bags and pouches, metal fasteners for leather or imitation leather goods, namely, wallets, purses, card cases, attaché cases, leather key holders, check-book holders, passport holders, cases for photographs, cases intended to contain toiletry articles sold empty, boxes of common metal, box fasteners of metal, bottle caps of metal, bottle closures of metal, metal knobs, padlocks, ferrules of metal for walking-sticks and umbrellas, nails, knife handles of metal, signboards of metal, fittings of metal for furniture, money boxes of metal, rivets of metal, bells, hooks of metal for clothes rails, door handles of metal, hand-operated hand tools and implements, non-electric cutlery, forks and spoons, side arms, other than firearms, razors, silver plated knives, forks and spoons, pocket knives, penknives, hunting knives, shoe lasts as shoemakers' tools, scissors, hand-operated garden tools, secateurs, flower cutters, manicure and pedicure sets, shaving cases, tweezers, sugar tongs, magnetic recording media, sound recording disks, calculating machines, data processing equipment and computers, spectacle cases, sunglasses, sports eyewear, optical goods, spectacles, binoculars, binocular cases, spyglasses, protective helmets for sports, riding caps for horse-riding, USB flash drives, electronic agendas, electronic games, computer game programs, computer mice, computer mouse pads, temperature indicators, rules as measuring instruments, rulers, directional compasses, loupes, dog whistles, mobile telephones, range finders, measuring rods, lamps, electric lamps, chandeliers, floor lamps, pocket lamps, lights for cycles and vehicles, lamp shades, nightlights, ceiling lights, faucets, vehicles, apparatus for locomotion by land, air or water, bicycles, cycles, automobiles, boats, yachts, baby carriages, precious metals and their alloys, precious stones, jewelry, chokers as necklaces, bracelets, rings, earrings, pendants, brooches, badges as jewelry, cuff links, medals, medallions, trinkets, tie clips, tie pins, chains as jewelry, boxes of precious metal, jewelry cases, watch cases not of precious metal, jewel and watch cases not of precious metal, horological and chronometric instruments, watches and component parts thereof, chronographs, chronometers, wristwatches, clocks, wall clocks, pendulettes, watch bands, watch clasps, watch dials, watch cases, watch chains, movements for clocks and watches, cases for clock- and watchmaking, presentation cases, watch presentation cases, key rings, musical instruments, musical boxes, paper, cardboard and goods made from these materials, namely, boxes, bags, small bags, envelopes and pouches for packaging purposes, wrapping paper, scrapbooks, printed matter, type for printing purposes, printer's type as numerals and letters, printing blocks, address stamps, bookbinding articles, stationery articles, document files as stationery, diaries, diary covers, almanacs, tear-off calendars, pads as stationery, paper sheets as stationery, drawing pads, writing or drawing books, calendars, note books, indexes, covers as stationery, binders as office supplies, pencils, pencil leads, pencil holders, pencil lead holders, felt pens, pens, penholders, drawing pens, nibs, boxes for pens, pastels as crayons, pencil sets, drawing sets, pencil holders, announcement cards,

index cards, writing paper, envelopes, adhesives glues for stationery or household purposes, artists' materials, paintbrushes, small brushes, painters' easels, canvas for painting, palettes for painters, paint boxes as articles for use in school, graphic prints, drawing instruments, drawing materials, paper clips, typewriters and office requisites except furniture, instructional or teaching material except apparatus, plastic materials for packaging, check-holder cases, embroidery designs, printed matter, graphic representations and reproductions, photographs, photograph stands, photo-engravings, engravings, pictures, portraits, posters, books, booklets, manuals, catalogs, pamphlets, periodicals, publications, printed matter, prospectuses, newspapers, reviews, maps, musical visiting cards, postcards, money clips, advertisement boards of paper or cardboard, sealing stamps, seals, stamps for seals, stamp cases, signboards of paper or cardboard, paper cutters as office requisites, table linen of paper, tablecloths of paper, table napkins of paper, place mats of paper, tablecloths of paper, coasters of paper, tablemats of paper, bibs of paper, handkerchiefs of paper, flower-pot covers of paper, bookmarkers, bookends, bookmark, writing pads, cardboard hatboxes, dust jackets, letter trays, engravings, lithographs, lithographic works of art, atlases, tickets, cardboard articles, jackets for papers, chromos, patterns for making clothes, paper flags, paper pennants, shields as paper seals, writing materials, writing instruments, handwriting specimens for copying, inkstands, signboards of paper or cardboard, non-textile labels, paper bows, paperweights, engraving plates, drawing boards, plates for engravings, blueprints, stencils, drawing rulers, painting books, rubber erasers, birthday books, stickers as stationery items, tidies, leather or imitation leather goods excluding cases adapted to the products for which they are intended, namely, handbags, traveling bags, rucksacks, school bags and satchels, beach bags, shopping bags, garment bags for travel, sports bags, diaper bags, plaid bags, reticules, wheeled bags, sling bags for carrying infants, wallets, card cases, attaché cases, key cases, tidies made of leather, trunks and suitcases, traveling trunks, sets and cases intended to contain toiletry articles sold empty, pouches, saddlery articles, saddle trees, bridles, bridoons, belts and leather straps, reins, horseshoes, horse collars, stirrups, parts of rubber for stirrups, stirrup leathers, harness, reins, head-stalls, halters, fastenings for saddles, leather straps, shoulder belts of leather, knee-pads for horses, eyeshades as riding tack, horse blankets, covers for horse-saddles, riding saddle underpads, whips, cat o' nine tails, riding crops, boxes for saddles, riding saddles, bits for animals, harness fittings, straps, boxes of leather or leather board, hat boxes of leather, boxes of vulcanized fiber, sun umbrellas, umbrellas, parasols, umbrella rings, umbrella covers, umbrella sticks, walking stick and umbrella handles, walking-stick seats, suitcase handles, collars for animals, animal leashes, muzzles, coats for animals, bags for animals, harness for animals, animal skins, pelts and hides, bags for campers, leather leads, leather trimmings for furniture, game bags, furniture coverings of leather, moleskin as imitation leather, small bags and bags as envelopes and pouches made of leather for packaging purposes, toiletry sets and traveling sets made of textile materials, plaid bags made of textile materials, diaper bags made of textile materials, furniture, frames for photographs, picture frames, moldings for picture frames, chests for toys, bins, not of metal, cushions, mobiles as decorative objects, decorative mobiles producing sounds, mattresses, cushions and beds for animals, wooden or plastic cases and boxes, corks for bottles, non-metal bottle caps, high chairs for babies, playpens for babies, mats for infant playpens, cradles, coat hangers, handles of knives, non-metallic, mirrors, hand-held mirrors, silvered glass, furnishings, tabletops, umbrella stands, book rests, magazine racks, hat stands, chairs, easy chairs, armchairs, settees, divans, seats, footstools, sofas, poufs, head-rests, beds, cupboards, bins, not of metal, benches, screens, doors for furniture, writing desks, plate racks, glass display cases, bookcase shelves and shelving, coatstands, bedsteads of wood, wooden furniture partitions, sideboards, dinner wagons, index cabinets, tables, draughtman's tables, washstands, office furniture, desks, works of art of wood, wax, plaster or plastic, busts, figurines and statues of wood, wax, plaster or plastic, busts for tailors, frames for embroidery, keyboards for hanging keys, non-metal trays, non-metal hooks for clothes rails, non-metal clothes hooks, display boards, signboards and signs of wood or of plastic materials, fans for personal use, non-metallic bed, furniture and door fittings, covers for clothing, namely, a wardrobe, covers for clothes for storage, display stands for newspapers, mail boxes neither of metal nor of masonry, tailors' dummies, non-metal baskets, non-metal door handles, display stands, desks, non-metal rivets, indoor blinds for windows, bottle racks, household or kitchen utensils and containers, combs and sponges, comb and brush cases, brushes except paintbrushes, material for brush-making, articles for cleaning purposes, unworked or semi-worked glass except glass used in building, glassware for use in table art, namely, drinking glasses, decanters, glass tableware, porcelain ware for use in table art, tableware made of porcelain, earthenware for use in table art, isothermic bags, isothermic bags for feeding bottles, toilet brushes, toilet sponges, toilet cases, holders for flowers, gardening gloves, non-electric portable coolers, hurricane lamps, tumblers, vegetable dishes, liqueur glass sets, mosaics of glass, not for building, fitted picnic baskets

including dishes, small bottles, perfume sprayers, perfume vaporizers, tart scoops, trays for domestic purposes, hand-operated pepper mills, pepper pots, salt cellars, dishes for soap, towel holders, towel holders as rings and bars, pottery, pots, pot lids, powder cases, napkin rings, vases, combs for animals, horse brushes, feeding troughs for animals, currycombs, shoehorns, shoe brushes, shoe-trees, non-metal piggy banks, heat insulated containers for beverages, insulating flasks, refrigerating bottles, manual mixers as cocktail shakers, glasses as receptacles, ropes, strings, nets, tents, tarpaulins sails, sacks, raw fibrous textile materials, fabric bags for packing, packaging bags made of textile materials, plastic fibers for textile use, textile fibers, silk cloths, woven or knitted fabrics, nonwoven fabrics, textile material for clothing purposes, bed and table covers, plaid blankets, curtains of textile or plastic, blinds, household linen, table runners, covers for cushions, bed covers, bed linen, sheets, bath linen except clothing, bath sheets, face towels, washing mitts, guest towels, table linen not of paper, table napkins of textile, tablemats not of paper, handkerchiefs of textile, labels of cloth, sleeping bags as sheeting, containers made of textile materials, tidies made of textile materials, upholstery materials, fabric with motifs designed for embroidery, coasters as table linen, fabric for boots and shoes, traveling rugs, bed covers, linings as textile, flags not of paper, diapered linen, lingerie fabric, bed clothes linen, upholstery fabrics, furniture fabrics, wall hangings of textile, tablecloths not of paper, tablemats not of paper, fabrics for textile use, sofa throws, clothing for men, women and children, pajamas, housecoats, nightshirts, layettes, dressing gowns, drawers, bathing trunks, bathing suits, swimsuits, blouses, boas, bodysuits, pullovers, sweaters, vests, knitwear, shirts, shirt yokes, shirt fronts, chemisettes, collars, ready-made clothing, underclothing, briefs and pants, panties and underpants, underwear, saris, tee-shirts trousers, jackets, suits, uniforms, coats, gabardines, raincoats, overcoats, parkas, skirts, dresses, boots, half-boots, esparto shoes or sandals, beach shoes, clogs, sports footwear, boot liners, footwear, slippers, bath sandals, boot uppers, iron fittings for footwear, fashionable clothing accessories for men, women and children, namely, hats, caps, bonnets, top hats, gloves, mittens, fingerless gloves, neckties, belts, money belts, scarves, ascots, pocket squares, sashes for wear, shawls, stockings, socks, tights, suspenders, bibs, not of paper, headbands, leather and imitation leather clothing, fur stoles, furs, scarf rings, pareos, aprons, lace and embroidery, ribbons and braid, buttons, sequins, hooks and eyes, pins and needles, artificial flowers, shoe fasteners, fastenings for clothing, fastenings for clothes, sewing boxes, buckles, shoe buckles, snap fasteners, fastenings for suspenders, brooches, belt clasps, hat ornaments, not of precious metal, shoe hooks, eyelets for clothing and shoes, shoe ornaments not of precious metal, hair ornaments, hair pins, hair grips, zip fasteners, fastenings for clothing, slide locks for bags, badges for wear, not of precious metal, carpets, rugs, mats and matting, linoleum and other materials for covering existing floors, non-textile wall hangings, bath mats, carpets and rugs, paper for wall coverings, wallpaper, carpet underlay, games, toys, gymnastic and sporting articles, decorations for Christmas trees, playing cards, cases and boxes for playing cards, mats for games, board games, counters for games, tumblers for dice, dice, rocking horses, golf gloves, rattles, plush toys, teddy bears, puzzles, parlor games, game balls, play balls, musical mobiles, playing cards, building games, checkers, golf with or without rollers, golf clubs, covers for dolls, dolls' clothes, dolls' houses, marionettes, toy mobiles, toy vehicles, activity mats, tobacco, smokers' articles, matches, match boxes, cigar boxes and cases, cigarette boxes and cases, lighters for smokers, ashtrays for smokers, cigar and cigarette cases, cigar cutters, tobacco jars, snuff boxes, not of precious metal

## Grounds for Opposition

Priority and likelihood of confusion	Trademark Act section 2(d)
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## Marks Cited by Opposer as Basis for Opposition

U.S. Registration No.	2526034	Application Date	07/27/1999
Registration Date	01/01/2002	Foreign Priority Date	NONE
Word Mark	LUCIDA		
Design Mark			
Description of Mark	NONE		

Goods/Services	Class 014. First use: First Use: 1999/09/15 First Use In Commerce: 1999/09/15 rings		
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U.S. Registration No.	2602024	Application Date	07/27/1999
Registration Date	07/30/2002	Foreign Priority Date	NONE
Word Mark	LUCIDA		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 014. First use: First Use: 2001/10/00 First Use In Commerce: 2001/10/00 jewelry, namely, bracelets, earrings, and necklaces, made of precious metals with precious and/or semi-precious stones;[ precious stones ]		

U.S. Registration No.	2915185	Application Date	03/19/2003
Registration Date	12/28/2004	Foreign Priority Date	NONE
Word Mark	LUCIDA		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 014. First use: First Use: 2004/06/25 First Use In Commerce: 2004/06/25 watches and brooches		

Attachments	F1055213.PDF ( 6 pages )(29556 bytes )
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### Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/Richard Lehv/
Name	Richard Lehv
Date	07/25/2012

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

In the Matter of Application Serial No. 79096573  
Published in the Official Gazette on March 27, 2012

TIFFANY (NJ) LLC,

Opposer

v.

OLIVIER BLANC and GUILLAUME  
FRANCIS GARAGNON,

Applicants

Opposition No.

**NOTICE OF OPPOSITION**

Tiffany (NJ) LLC (“Tiffany” or “Opposer”), a limited liability company duly organized and existing under the laws of the state of Delaware with a principal place of business at 15 Sylvan Way, Parsippany, New Jersey 07054, believes that it will be damaged by the issuance of a registration for the trademark LUCIDE, applied for in Application Serial No. 79096573, filed December 13, 2010 for a wide variety of goods and services in multiple International Classes, and opposes the registration of the goods in International Class 14 and the services in International Class 35. As grounds for the opposition, Opposer, by its attorneys, Fross Zelnick Lehrman & Zissu, P.C., alleges as follows:

1. Opposer is one of the most famous companies in the world and the TIFFANY brand is recognized worldwide as designating goods and services exclusively from Opposer. In addition to the mark TIFFANY, Opposer has used a number of other trademarks and service marks for various of its goods and services, including the mark LUCIDA.

2. Opposer has used the mark LUCIDA in commerce for jewelry since at least 1999.

3. Among the goods offered by Opposer under the mark LUCIDA are rings, bracelets, earrings, necklaces, watches and brooches.

4. Tiffany sells its products under the LUCIDA mark in more than 50 retail stores in the U.S., as well as through direct marketing channels including catalogs, and on its website.

5. Tiffany is the owner of the following United States Trademark Registrations for the mark LUCIDA:

Mark	Regn No.	Goods	Date of Regn
LUCIDA	2,526,034	Rings in Int'l Class 14	January 1, 2002
LUCIDA	2,602,024	Jewelry, namely, bracelets, earrings, and necklaces, made of precious metals with precious and/or semi-precious stones in Int'l Class 14	July 30, 2002
LUCIDA	2,915,185	Watches and brooches in Int'l Class 14	December 28, 2004

6. Opposer's registrations for the LUCIDA mark are valid, subsisting and in full force and effect and serve as evidence of Opposer's exclusive right to use the mark in commerce on or in connection with the goods identified in the Registrations, as provided by Section 33(b) of the Lanham Act, 15 U.S.C. § 1115(b). Registration numbers 2,526,034 and 2,602,024 are incontestable and serve as conclusive evidence of Opposer's exclusive right to use the LUCIDA mark for the listed goods and services.

7. By virtue of Opposer's extensive sales, advertising and promotion of its goods under its mark, the LUCIDA mark has become instantly recognizable to the public as exclusively denoting Opposer, its goods and services. In addition, the LUCIDA mark has come to symbolize the high quality of Opposer's products. As a result of Opposer's substantial effort and investment on behalf of its brand, the goodwill inherent in the LUCIDA mark is an enormously valuable asset of Opposer.

8. Applicants' filing date is long after Opposer's date of first use of its LUCIDA mark and long after the date the LUCIDA mark was first registered in the U.S. Patent and Trademark Office.

9. As a matter of law, Applicants were on constructive notice of Opposer's rights in its LUCIDA mark, based on Opposer's registrations in existence at the time Applicants applied to register LUCIDE.

10. The mark applied for, LUCIDE, is confusingly similar to Opposer's LUCIDA mark. Consumers will believe that Opposer manufactured, approved or endorsed Applicants' goods or services, or that Opposer and Applicants are otherwise connected or affiliated, when that is not the case.

11. The goods for which Applicants seek registration are identical or closely related to the goods offered by Opposer under its LUCIDA mark. Opposer sells jewelry under the LUCIDA mark. Applicants intend to sell the identical items, including "bracelets, rings, earrings, pendants, brooches, . . . and . . . watches." Applicants' goods could easily be encountered by the same purchasers as Opposer's, under circumstances that could give rise to the mistaken belief that Applicants' goods come from a common source, given the close similarity of the marks.

12. The services for which Applicants seek registration are closely related to the goods offered by Opposer under its LUCIDA mark. Applicants intend to offer "retail store services featuring . . . precious stones, jewelry, chokers as necklaces, bracelets, rings, earrings, pendants, brooches, badges as jewelry, cuff links, medals, medallions,

trinkets, tie clips, tie pins, chains as jewelry, boxes of precious metal, jewelry cases, watch cases not of precious metal, jewel and watch cases not of precious metal, horological and chronometric instruments.” Since Applicants intend to offer retail store services under the mark LUCIDE, featuring the very goods for which Opposer has registered the mark LUCIDA, and since Tiffany is one of the most famous jewelry retailers in the world, consumer confusion is inevitable.

13. Applicants’ application is unrestricted as to consumers. As a result, it is presumed that Applicant’s goods will be offered to all consumers, including consumers of Opposer’s goods and services.

14. The registration of Applicants’ mark is inconsistent with Opposer’s prior rights in its LUCIDA mark and inconsistent with Opposer’s statutory grant of exclusivity of use of its registered mark and would harm, damage or destroy Opposer’s investment and goodwill in its mark.

#### **CLAIM FOR RELIEF UNDER SECTION 2(d)**

15. Opposer repeats and re-alleges each and every allegation contained in paragraphs 1 through 14 as if fully set forth herein.

16. Opposer’s LUCIDA mark is exclusively associated with Opposer and has been used continuously by Opposer since a date prior to any date on which Applicants can rely.

17. Applicants’ LUCIDE mark is virtually identical to Opposer’s registered and prior used LUCIDA mark and has a sound, meaning, appearance and commercial impression similar to those of Opposer’s mark. In addition, Applicants seeks to register their mark for goods and services identical to or closely related to the goods long offered by Opposer under its mark.

18. By virtue of Opposer’s longstanding use of the LUCIDA mark, the goodwill associated with the mark, and Opposer’s Registrations therefor, the registration by

Applicants of LUCIDE for goods and services related to the goods sold by Opposer is likely to cause confusion or cause mistake or to deceive the purchasing public into believing that Applicants' goods and services offered under the LUCIDE mark originate with, come from or are otherwise associated with Opposer, or that Applicants' goods and services are endorsed, licensed, or sponsored by or in some way connected with Opposer, in violation of Section 2(d) of the Lanham Act, 15 U.S.C. §1052(d).

19. By reason of the foregoing, Opposer is likely to be harmed by registration of the mark LUCIDE, shown in Application Ser. No. 79096573.

WHEREFORE, Opposer respectfully requests that this opposition be sustained and that the registration sought by Applicants in Application Ser. No. 79096573 be denied.

Dated: New York, New York  
July 25, 2012

FROSS ZELNICK LEHRMAN &  
ZISSU, P.C.

By: /Richard Lehv/  
Richard Lehv

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866 United Nations Plaza  
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(212) 813-5900

### **Certificate of Service**

I hereby certify that a true and complete copy of the foregoing Notice of Opposition is being served by first-class mail, postage prepaid, on the attorney of record for the Applicant at the following address:

Susan Okin Goldsmith, Esq.  
SorinRoyerCooper LLC  
11th floor

Two Tower Center Boulevard  
East Brunswick NJ 08816

this 25th day of July, 2012.

/Richard Lehv/  
Richard Lehv