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Filing date: **09/03/2015**

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

Proceeding	91213413
Party	Plaintiff Mappin & Webb Limited
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Signature	/Douglas A. Rettew/
Date	09/03/2015
Attachments	9-3-15 Dec. of Anna Naydonov in Support of Opposer's Reply ACR Brief.pdf(127534 bytes) Exhibit 1 - Cornelia Webb.pdf(212418 bytes) Exhibit 2 - Migor.pdf(286254 bytes) Exhibit 3 - Marie Claire.pdf(1128266 bytes) Exhibit 4 - Glamour - Kate Middleton's look.pdf(708167 bytes) Exhibit 5 - allacronyms - KFC.pdf(541692 bytes) Exhibit 6 - allacronyms - AMEX.pdf(508984 bytes)

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

MAPPIN & WEBB, LIMITED, Opposer v. M WEBB, LLC Applicant.	Opposition No. 91213413 Mark: M WEBB Serial No.: 85460569
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**DECLARATION OF ANNA NAYDONOV IN SUPPORT OF
OPPOSER’S REPLY ACR BRIEF**

I, Anna Naydonov, declare as follows:

1. I am an attorney at Finnegan, Henderson, Farabow, Garrett & Dunner, LLP and am counsel for Opposer Mappin & Webb, Limited (“Mappin & Webb”). The facts set forth in this Declaration are based on my personal knowledge, unless otherwise noted.

2. On September 2, 2015, I accessed the website located at <http://www.corneliawebb.com/>. Attached as Exhibit 1 are true and correct printouts from the <http://www.corneliawebb.com/> website.

3. On September 3, 2015, I accessed the website located at http://www.migor.it/webb_scott&id=1&lang=en_US. Attached as Exhibit 2 are true and correct printouts from the http://www.migor.it/webb_scott&id=1&lang=en_US website.

4. Attached as Exhibit 3 is a true and accurate printout from the <http://www.aprcommunications.com/our-work/category/sectors/jewellery-watches/> website, which contains a 2012 *Marie Claire* article about Jane Fallon wearing Mappin & Webb jewelry at the Golden Globe Awards 2012.

5. On September 3, 2015, I accessed the *Glamour* magazine website, located at www.glamour.com. Attached as Exhibit 4 is a true and accurate printout of the July 5, 2015 “All Details of Kate Middleton’s Look for Princess Charlotte’s Christening” *Glamour* article, available at <http://www.glamour.com/fashion/blogs/dressed/2015/07/kate-middleton-dress-princess-charlotte-christening>.

6. On September 3, 2015, I accessed the www.allacronyms.com website and searched for “KFC.” Attached as Exhibit 5 is a true and correct printout of the search results for “KFC,” available at <http://www.allacronyms.com/KFC>.

7. On September 3, 2015, I accessed the www.allacronyms.com website and searched for “AmEx.” Attached as Exhibit 6 is a true and correct printout of the search results for “AmEx,” available at <http://www.allacronyms.com/AMEX>.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct pursuant to 28 U.S.C. § 1746. This declaration was executed on September 3, 2015 in Washington, D.C.

Date: September 3, 2015



Anna B. Naydonov

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing DECLARATION OF ANNA NAYDONOV IN SUPPORT OF OPPOSER'S REPLY ACR BRIEF was served by first class mail, postage prepaid, on this 3rd day of September 2015, upon counsel for Applicant at the following address of record:

Molly Buck Richard
Richard Law Group
8411 Preston Road, Suite 890
Dallas, TX 75225-5500

A handwritten signature in black ink, appearing to read "J. Valusek", is written over a horizontal line.

Opposition No. 91213413
Mappin & Webb Limited v. M Webb LLC
Declaration of Anna Naydonov in Support of Opposer's Reply ACR Brief

Exhibit 1



294

FOLLOW

START A SHOP

In.

Fb.

Newsletter



New in

Necklaces

Bracelets

Rings

Earrings

Avant Garde

Bespoke

About

Contact

Necklaces

SEK → USD?

Hi there! It looks like this store isn't using your local currency. Do you want us to convert the prices to USD?

Yes

No



Cornelia
CORNELIA WEBB

New in
Necklaces
Bracelets
Rings
Earrings

Avant Garde
Bespoke

Molded pinky necklace
1200 SEK

Refined necklace - diamond
1300 SEK

Folded collar
1200 SEK

About
Contact

Folded collar
1200 SEK

Folded collar
1200 SEK

Coral necklace
800 SEK

294 FOLLOW START A SHO

The image displays a collection of jewelry from the brand Cornelia Webb. It features several necklaces, including a 'Molded pinky necklace' (1200 SEK), a 'Refined necklace - diamond' (1300 SEK), a 'Coral necklace' (800 SEK), and three 'Folded collar' necklaces in blue, white, and pink (each 1200 SEK). There are also partial views of bracelets and rings. The brand name 'Cornelia Webb' is prominently displayed at the top left. A navigation menu on the left lists 'New in', 'Necklaces', 'Bracelets', 'Rings', and 'Earrings'. A secondary menu below it lists 'Avant Garde' and 'Bespoke'. On the right side, there are links for '294', 'FOLLOW', and 'START A SHO'. The jewelry is presented against a clean, light background.



New in

Necklaces

Bracelets

Rings

Earrings

Avant Garde

Bespoke

About

Contact

New in

SEK → USD?

Yes

No

Hi there! It looks like this store isn't using your local currency. Do you want us to convert the prices to USD?

Cornelia
CORNELIA WEBB

- New In
- Necklaces
- Bracelets
- Rings
- Earrings
- Avant Garde
- Bespoke
- Contact



Wired pearl hand piece small
750 SEK



Wired pearl open ring
1250 SEK

Wired pearl bracelet extra small



Sized single chain earring
850 SEK



Sized bracelet wrist to finger
990 SEK



Sized single chain earring



Sized armring - large
2550 SEK

Wired pearl 294 [BUY](#) [FOLLOW](#) [START A SHOP](#)

[Follow](#)

Opposition No. 91213413
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Declaration of Anna Naydonov in Support of Opposer's Reply ACR Brief

Exhibit 2

MIGOR
CAMIGERIA

HOME
COMPANY
ADVERTISING
COLLECTIONS
CONTACTS



CONTATTACI

J. A. Fleming, 25 St
41012 Carpi (MO)
Ph +39 059 6258311
Fax +39 059 686465
Capitale sociale €
2.500.000,00 int. vers.
Registro Imprese di Modena e.
Cod. Fisc. 00170600365
Partita I.V.A. 00170600365
REA C.C.I.A.A. MODENA N.
19740

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migor-lancetti@migor.it
migor-balestra@migor.it
ced@migor.it

Migor SpA
via J. A. Fleming, 25
41012 Carpi (MO)
+39 059 6258311

Cap. soc. €2.500.000,00 int. vers.

Registro Imprese di Modena e.
Cod. Fisc. 00170600365
P. IVA 00170600365
REA C.C.I.A.A. MODENA N. 19740
info@migor.it

HOW TO REACH US

BY CAR

- › from Bologna Casalecchio
- › from Modena Tangenziale Nord
- › from Milano A1



MIGOR S.p.A. - Abbigliamento
Via John Ambrose Fleming, 25.
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MIGOR
CANTIERI

HOME
COMPANY
ADVERTISING
COLLECTIONS

LAURA DIAGIOTTI

NAVIGARE

PHILIP VANCE

WEBB & SCOTT

LAVETTI

CONTACTS



shop m/w 2014

shop m/s 2015

catalog m/w 2014

shop

catalog m/s 2015

Webb & Scott Man

Webb & Scott may in all respect be defined as the leading edge among all company brands as far as creativity and innovation are concerned. Webb & Scott collection perfectly sums up a new way of wearing shirts and ranges from trendy taste, happily revisited with collars and fittings making the shirt versatile to every new use, to sports and free-time oriented wear. In this case new details such as trim, soft and informal collars, light treatments on the end garment enrich the product and give shirt the leading role in menswear again. Polo shirts and knitwear complete our range and match in perfect harmony using some of the collection's fabrics.

Webb & Scott Woman

Along with Webb & Scott brand Migor also offers a women's collection sharing with Webb & Scott Menswear a great affinity of image and use. A young woman for a practical and yet fashion-conscious style with Migor's



info@migor.it

02 7611 1111

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SPINNET

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Exhibit 3

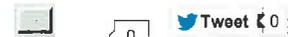
OUR WORK

JEWELLERY & WATCHES PR

RAYMOND WEIL YEAR OF MUSIC

Raymond Weil

APR developed an integrated marketing and PR campaign for Raymond Weil with Music as its heart from sponsorship of the BRIT and Classic BRIT Awards, Freddie Mercury's 65th Anniversary, creative advertising to a unique luxury live music series and editorial coverage featuring emerging and established music talent.



RAYMOND WEIL AND THE BRIT AWARDS

Raymond Weil

Activation of a digital and print media campaign that gave Raymond Weil massive stand out and brand recognition of its fifth year sponsorship of the BRIT Awards. A bespoke BRIT Awards digital channel was created in partnership with ES Magazine providing exclusive content during the two month lead up to the BRITs including Raymond Weil behind the scenes footage and stories. Profile interviews set up with four emerging artists including Labrinth featured within special pre-BRITs issue





RAYMOND WEIL PRE BRIT AWARDS DINNER HOSTED BY LABRINTH

Raymond Weil

APR arranged for Raymond Weil to partner with producer/songwriter Labrinth to host an intimate dinner event for 80 guests at his restaurant Mosaica



in advance of the BRIT Awards to promote Raymond Weil as the official timing partner and official watch of The BRIT Awards 2012. Labrinth's exclusive network of friends from the music industry and media attended. Exclusive interviews and performance footage was syndicated to broadcast media and online outlets.



Tweet 0





HOME HOUSE LIVE HOSTED BY RAYMOND WEIL

Raymond Weil

APR developed an exciting new music industry event called Home House Live – a live music platform that showcases the best of unsigned, emerging and established talent that the UK scene has to offer within an intimate, luxury setting. APR liaised with leading record companies to secure talent – New Young Pony Club, Kids in Glass Houses, Dutch Uncles, Wretch 32, Killer Keller and Charlie Simpson to name but a few – to perform to an audience of 80-150 guests. Each performance was professionally filmed and seeded online via media partners and social media.





Home House
Live

hosted by

RAYMOND WEIL
GENEVE





RAYMOND WEIL DIZZEE RASCAL PARTNERSHIP

Raymond Weil

To reposition the brand amongst a younger generation, Raymond Weil partnered with Dizzee Rascal to support his upcoming launch of single Dirtee Disco. The Raymond Weil watch appears in opening shot as close up for 7 seconds, viewed in 27 countries and viewed by over 300 million people worldwide with over £7 million of exposure across MTV and other major music channels



Tweet 0





TW STEEL ROX EVENT WITH DAVID COULTHARD

TW Steel

APR managed the TW Steel partnership with Rox, Glasgow's most renowned diamond and watch specialists, to replicate the launch of David Coulthard's special edition timepiece in their flagship store. Hosted by TW Steel brand ambassador David Coulthard and promoted with tools including the Lotus Renault GP show car, the event provided APR with a platform to secure extensive media coverage (including broadcast) for the special edition David Coulthard watch, profile features on the brand ambassador as well as showcasing the full TW Steel collection, to key regional media.



GOLDEN GLOBES CELEBRITY DRESSING

Mappin & Webb

APR liaised with jewellery client Mappin & Webb to confirm that Jane Fallon would be attending the Golden Globes in

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Games 2011 Oscars 2011 BAFTAs 2011 Grammys 2011 SAG Awards 2011 **Golden Globes 2012**



Golden Globe Awards 2012

57 of 60

Ricky Gervais and Jane Fallon

Controversial host **Ricky Gervais** suited up in a maroon suit for the big night while partner Jane Fallon teamed an elegant black gown with **Mappin & Webb** diamond bracelets.

More Celebrity Parties

- Venice Film Festival 2011
- V Festival 2011
- Tosh Choice Awards 2011
- Zara Philips and Mike Tindell's Wedding
- Festival Highlights: Big Chill, Camp Festival, Party in the Park and more.

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Ricky Gervais PA

2012 with partner Ricky Gervais, wearing a **Mappin & Webb** diamond tennis bracelet. APR communicated this story to key fashion press ahead of the event and ensured that Mappin & Webb was credited in stories written about the Golden Globes and red carpet fashion.



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GOLDEN GLOBE AWARDS 2012

See all the stars and style from the 2012 Golden Globes red carpet

RICKY GERVAIS

Host with the most Ricky Gervais hit the red carpet with wife Jane Fallon, in an elegant black gown and diamond bracelets from Mappin & Webb. Ricky showed off a super-trim figure in a suave charret bespoke suit by Ted Baker. Despite being slammed for his risqué one-liners last year, the Brit comedian refused to tone down his act, kicking off his assault on the A-list audience by joking: 'Nervous? Don't be. This isn't about you.'

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Wowcher Hair Cut Dea

AS WORN BY THE DUCHESS OF CAMBRIDGE

Kiki McDonough

Throughout the Duchess of Cambridge's

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Erickson Boamon help Afghan students jewellery careers



Catherine, Duchess of Cambridge wears Kiki McDonough earrings at Epsom Downs

KIKI MCDONOUGH

Catherine Wears Kiki

JULIA NEEL · 09 June 2011 · 0 comments

CATHERINE, Duchess of Cambridge, is having a massive effect on fashion - causing Reiss dresses and LK Bennett shoes to sell out almost the moment she's seen wearing them. We imagine that her royal style power will have the same result with the Kiki McDonough earrings that she's been wearing recently. "It is wonderful to see such a stylish young person wearing my designs," McDonough told us. "As a 'modern Royal', Catherine is as chic when dressed down as she is at formal engagements - my jewellery is designed to be worn every day, and Catherine does this beautifully." The 18-carat gold citrine drop earrings are valued at £495 and were chosen by the Duchess herself. "I once counted Princess Diana as one of my most loyal customers and we always had such fun choosing designs for her to wear - she took great pleasure in wearing my jewellery," McDonough continues. "It is a very special added extra that Catherine now enjoys wearing my designs too." Visit www.kiki.co.uk for more information.

public appearances, APR has managed press coverage of the Duchess wearing Kiki McDonough jewellery. Through careful liaison with top jewellery editors and both proactive and reactive media relations, APR has achieved exceptional coverage in premium UK and international fashion magazines, newspapers and websites for this London based jewellery designer who specialises in the use of vibrant semi precious stones in unique and daring colour combinations.





May 27 2011

Why diamonds are not always a girl's best friend

It was the generous glint nestling among the glossy dark locks that did it... [Read more](#)



JUICY COUTURE PRINCESS
PARLOUR



Juicy Couture Timepieces

This was the first press event exclusively designed for fashion and jewellery assistants, rather than editors and directors. Hosted at the Juicy Couture London Showroom, the assistants were invited for a Friday afternoon of pampering including massage, manicures and a wig studio at the 'Princess Parlour'. Each attendee was photographed following their makeover wearing their chosen Juicy Couture Timepiece and wig, which they had been gifted. Following the event, all participating assistants called in product for shoots.



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LIVIA FIRTH GREEN CARPET CHALLENGE

Calleija

APR met with Livia Firth ahead of the 2010 Oscars to introduce her to Argyle Pink Diamond jewellery client, Calleija, and the brand's ethical credentials. APR arranged for Livia to wear a selection of Calleija jewellery to the ceremony as part of her Green Carpet Challenge, accompanied by her Oscar-nominated husband Colin Firth. APR managed communication of the news, both before, during and after the ceremony, securing



coverage in top UK and international fashion press as well as creating a Twitter debate about ethical diamonds and a blog post written by Livia herself about the jewellery on Vogue.com.

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The Green Carpet Challenge

In The Pink



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IN YOUR MONTHLY ISSUE
And the winner is...
 Still designers search the perfect Oscar statuette

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Exhibit 4



Celebrity Style
All the Details of Kate Middleton's Look for Princess Charlotte's Christening



Fashion



Celebrity Style Fall Fashion Trends Style Your Size Outfit Ideas

Celebrity Style

All the Details of Kate Middleton's Look for Princess Charlotte's Christening

By *Leah Melby* // July 5, 2015

Kate Middleton just made another fashion choice sure to be included in her personal best-dressed hall of fame, picking a tailored white **Alexander McQueen** dress for the christening of **Princess Charlotte**. In typical Kate style, the dress is a classic cut that would look perfectly at home in any decade.





The proud mum kept things monochromatic with a Jane Taylor hat and pale nude pumps, finishing off the look with diamond earrings and a matching pendant from **Mappin & Webb**. If Princess Charlotte's lacy gown looks familiar, it's because you've seen it before: **Prince George wore the same garment on his big day** in October 2013.

For the same event with George, **Kate picked another light-cream-color Alexander McQueen dress and Jane Taylor hat** that complemented the babe's gown much like today's does.

Read This Next

Supermodels Kendall Jenner and Karlie Kloss Kick Off Couture Week In Paris

Come see all the details about the royal family's big day.

Photos: Getty Images

Keywords: alexander mcqueen, kate Middleton, princess charlotte, royal style, royals,

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Kate Middleton Wore a White Alexander McQueen Dress to Princess Charlotte's Baptism: Glamour.com

This Might Just Be the Craziest Thing That Ever Happened on the Real Housewives

All of Your Favorites Are Coming Back to Days of Our Lives—Take a Look

Kylie Jenner Is Very Blond, and This Time There's No Wig

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By *Beth Shapouri* // 8 Hours Ago

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By Anna Moeslein // 9 Hours Ago

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Styling Tricks for Layering Your Necklaces, Courtesy of Jennifer Fisher

The And - Ali and Andrew Part 1: Why Did You Cheat on Me?

The And Part 2: V Me Anot

Home

Check Out the House Where Everyone From Frank Sinatra to Rihanna Has Partied

By Kim Fusaro // 10 Hours Ago

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The Perfect Boots to Wear With Every Fall Outfit, Courtesy of Tory Burch

By *Leah Melby* // 10 Hours Ago

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By Jillian Kramer // 10 Hours Ago

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10 Fall 2015 Runway Trends You Should Be Shopping on Sale

By *Leah Melby* // 12 Hours Ago

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Relationship? Do This
One Thing Together Every
Day

This Might Just Be the
Craziest Thing That Ever
Happened on the Real
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All of Your Favorites Are
Coming Back to Days of
Our Lives—Take a Look

Kylie Jer
Blond, a1
There's 1

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Exhibit 5

What does KFC (/KFC) mean?

71 meanings of KFC acronym or abbreviation



KFC stands for

- 👍 11 🗨️ [KFC \(/KFC/Kentucky_Fried_Cruelty\)](#) Kentucky Fried Cruelty +1

- 👍 9 🗨️ [KFC \(/KFC/Korean_Fried_Chicken\)](#) Korean Fried Chicken +2

- 👍 8 🗨️ [KFC \(/KFC/Kentucky_Fried_Chicken\)](#) Kentucky Fried Chicken +3
Business (/business/abbreviations)

- 👍 6 🗨️ [KFC \(/KFC/Kids_for_Christ\)](#) Kids for Christ

- 👍 5 🗨️ [KFC \(/KFC/Kitchen_Fresh_Chicken\)](#) Kitchen Fresh Chicken

- 👍 3 🗨️ [KFC \(/KFC/Kremenchuk_Flight_College\)](#) Kremenchuk Flight College
Airline (/airline/abbreviations), ICAO airline code (/icao_airline_code/abbreviations), Organizations (/organizations/abbreviations)

- 👍 3 🗨️ [KFC \(/KFC/Kimberton_Fire_Company\)](#) Kimberton Fire Company
Government (/government/abbreviations), Ambulance service (/ambulance_service/abbreviations), FIRE (/fire/abbreviations)

- 👍 3 🗨️ [KFC \(/KFC/Kenya_Flower_Council\)](#) Kenya Flower Council

[KFC \(/KFC/Kung_Fu_Cinema\)](#) Kung Fu Cinema

[View K.F.C. \(/K.F.C.\)](#) 1

Sort by

Filter by Categories

- [Business \(/_business/KFC\)](#) 1
- [Government \(/_government/KFC\)](#) 1
- [Medical \(/_medical/KFC\)](#) 2
- [Organizations \(/_organizations/KFC\)](#)
- [Technology \(/_technology/KFC\)](#) 12
- All (/KFC)** 7

Filter by Topics

- [Airline \(/KFC/airline\)](#) 1
- [Ambulance service \(/KFC/ambulance_service\)](#) 1
- [Conference \(/KFC/conference\)](#) 1
- [Event \(/KFC/event\)](#) 1
- [FIRE \(/KFC/fire\)](#) 1
- [Fire company \(/KFC/fire_company\)](#) 1
- [Fire protection \(/KFC/fire_protection\)](#) 1
- [ICAO airline code \(/KFC/icao_airline_code\)](#) 1
- [Pennsylvania \(/KFC/pennsylvania\)](#) 1

Was it helpful?

Do you use... ?

3

3

KFC (/KFC/Kilmarnock_Football_Club) Kilmarnock Football Club

3

KFC (/KFC/Kung_Fu_Chaos) Kung Fu Chaos

3

KFC (/KFC/Kerala_Financial_Corporation) Kerala Financial Corporation

3

KFC (/KFC/Kiwanis_Family_Conference) Kiwanis Family Conference
Organizations (/organizations/abbreviations), Conference (/conference/abbreviations), Event (/event/abbreviations)

2

KFC (/KFC/Kenya_Film_Commission) Kenya Film Commission

Tortured to Death

Undercover video captures shocking chicken cruelty, learn more!



show more (/KFC/2)

Search for "KFC" in

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Opposition No. 91213413
Mappin & Webb Limited v. M Webb LLC
Declaration of Anna Naydonov in Support of Opposer's Reply ACR Brief

Exhibit 6

What does AMEX (/AMEX) mean?

8 meanings of AMEX acronym or abbreviation

Discover it® Card Offer

No Annual Fee, Double Cash Back At The End Of Your 1st Year—See Terms.



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AMEX stands for

14 Amex (/Amex/American_Express) American Express Finance (/finance/abbreviations), CHAT (/chat/abbreviations), Internet slang (/internet_slang/abbreviations)

12 AMEX (/AMEX/American_Stock_Exchange) American Stock Exchange Business (/business/abbreviations), Stock market (/stock_market/abbreviations), Stock Exchange (/stock_exchange/abbreviations)

7 AMEX (/AMEX/Australian_Monsoon_EXperiment) Australian Monsoon EXperiment Science (/science/abbreviations), Climatology (/climatology/abbreviations), Meterology (/meterology/abbreviations)

3 AMEX (/AMEX/Aeromarket_Express) Aeromarket Express Airline (/airline/abbreviations), Call Sign (/call_sign/abbreviations), Organizations (/organizations/abbreviations)

3 AMEX (/AMEX/Albamex) Albamex Organizations (/organizations/abbreviations)

1 AMEX (/AMEX/Atlantic_Meteorology_Experiment) Atlantic Meteorology Experiment Science (/science/abbreviations), Technology (/technology/abbreviations)

1 AMEX (/AMEX/Allied_Entreprises) Allied Entreprises Organizations (/organizations/abbreviations), Technology (/technology/abbreviations)

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