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Filing date: **09/28/2015**

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

Proceeding	91220573
Party	Defendant Linda Grandia
Correspondence Address	LINDA GRANDIA G & G EXCHANGE KEPPLERSTREET 13 AMERSFOORT, 3817TA NETHERLANDS info@missmultiverse.com
Submission	Other Motions/Papers
Filer's Name	Linda Grandia
Filer's e-mail	info@missmultiverse.com
Signature	/Linda Grandia/
Date	09/28/2015
Attachments	EARLY DISCOVERY DOCUMENT.pdf(124185 bytes )

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

**In re: Application Serial No. 86/235,052**  
**Mark: MISS MULTIVERSE**  
**Filed: March 28, 2014**  
**Published on October 14, 2014**

<b>MISS UNIVERSE L.P., LLLP,</b>	)	<b>Opposition No. 91220573</b>
	)	
<b>Opposer,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>LINDA GRANDIA,</b>	)	
	)	
<b>Applicant.</b>	)	
	)	
_____	)	

**EARLY DISCOVERY DOCUMENT – MISS MULTIVERSE TRADEMARK**

Amersfoort, The Netherlands, September 1st, 2015

**The person to contact for the discovery information is:**

Name: Linda Grandia Address: Kepplerstraat 13 Postal code: 3817TA  
City: Amersfoort  
Country: The Netherlands  
Phone Number: 001 31 6 380 56 135 Email: [info@MissMultiverse.com](mailto:info@MissMultiverse.com)

**Linda Grandia is in possession of the following:**

- 1) **Approved and existing registered trademarks of Pageants in the USA** Evidence that Miss Universe is not the only trademark using the combination of "miss" "Üni" and "vers"
  
- 2) **Existing Benelux Community Trademark registration** Miss Multiverse and Mrs. Multiverse

- 3) **Previous Advertising and TV broadcasting contract** with the use of the Miss Multiverse trademark in the USA - 2013 and 2014
- 4) **Current and future Advertising and TV production contract** using the Miss Multiverse trademark in the USA Filming 2015/broadcasting 2016
- 5) **Social media evidence showing no likelihood of confusion.**
- 6) **Contestants evidence:** Miss and Mrs Multiverse America / USA contestants representing Miss Multiverse in the USA over the past 5 years.
- 7) **Distinctive operational, branding and concept differences** between the Miss Universe pageant system and our organization and TV program.

*Carol*  
*Guerra*  
*Guerra*  
MISS & MRS  
MULTIVERSE  
GG EXCHANGE

**Certificate of Service**

*I hereby certify that a true and complete copy of the attached foregoing (**Early Discovery Document - Miss Multiverse Trademark**) has been served upon opposing counsel ( Amy Gaven of Kelley Drye & Warren LLP ) by e-mail (on September 2, 2015 to e-mail address: [agaven@kelleydrye.com](mailto:agaven@kelleydrye.com) ) and mailing said copy on ( September 2, 2015 ), via First Class Mail, postage prepaid to: ( Amy Gaven, Kelley Drye & Warren LLP, 101 Park Avenue, New York, 10178, United States).*



MISS & MRS  
G. EXCHANGE

Dated: \_\_\_\_\_ September 2, 2015

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

Linda Grandia  
**Applicant**

Respectfully submitted,

/Linda Grandia/

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