

ESTTA Tracking number: **ESTTA424389**

Filing date: **08/10/2011**

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

Petition for Cancellation

Notice is hereby given that the following party requests to cancel indicated registration.

Petitioner Information

Name	Renzi & Partners S.R.L.		
Entity	Limited Liability Company	Citizenship	Italy
Address	95 Piazza Capranica Rome, ITALY		

Attorney information	Holly Pekowsky, Esq. AMSTER, ROTHSTEIN & EBENSTEIN LLP 90 Park Avenue New York, NY 10016 UNITED STATES ptodocket@arelaw.com Phone:212-336-8000		
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Registration Subject to Cancellation

Registration No	3530353	Registration date	11/11/2008
Registrant	Roniza S.R.L. Corp. Italy 202 Blackstone Ave. Ithaca, NY 14850 UNITED STATES		

Goods/Services Subject to Cancellation

Class 008. First Use: 2003/06/12 First Use In Commerce: 2003/06/12 All goods and services in the class are cancelled, namely: Tableware, namely, knives, forks and spoons
Class 021. First Use: 2003/06/12 First Use In Commerce: 2003/06/12 All goods and services in the class are cancelled, namely: Dinnerware, namely, hand crafted, hand painted Italian ceramic household or kitchen containers, dinnerware consisting of mugs, plates, cups, saucers, bowls and serving platters

Grounds for Cancellation

False suggestion of a connection	Trademark Act section 2(a)
<i>Torres v. Cantine Torresella S.r.l. Fraud</i>	808 F.2d 46, 1 USPQ2d 1483 (Fed. Cir. 1986)
Priority and likelihood of confusion	Trademark Act section 2(d)
Dilution	Trademark Act section 43(c)

Mark Cited by Petitioner as Basis for Cancellation

U.S. Application No.	85167257	Application Date	11/02/2010
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Registration Date	NONE	Foreign Priority Date	06/07/2010
Word Mark	MODIGLIANI		
Design Mark			
Description of Mark	The mark consists of the word MODIGLIANI stylized, with the letter "M" superimposed over a quadrangular figure in a contrasting shade to the "M".		
Goods/Services	<p>Class 012. First use: Vehicles, apparatus for locomotion by land, air or water</p> <p>Class 014. First use: Precious metals and their alloys and goods in precious metals or coated therewith, not included in other classes; jewellery, precious stones; horological and chronometric instruments</p> <p>Class 016. First use: Paper, cardboard and goods made from these materials, not included in other classes; printed matter; bookbinding material; photographs; stationery; adhesives for stationery or household purposes; artists' materials; paint brushes; typewriters and office requisites (except furniture); instructional and teaching material (except apparatus); plastic materials for packaging (not included in the other classes), printers' type; printing blocks</p> <p>Class 018. First use: Leather and imitations of leather, and goods made of these materials and not included in other classes; animal skins, hides; trunks and travelling bags; umbrellas, parasols and walking sticks; whips, harness and saddlery</p> <p>Class 020. First use: Furniture, mirrors, picture frames; goods (not included in other classes) of wood, cork, reed, cane, wicker, horn, bone, ivory, whalebone, shell, amber, mother-of-pearl, meerschaum and substitutes for all these materials, or of plastics</p> <p>Class 021. First use: Household or kitchen utensils and containers (not of precious metal nor coated therewith); combs and sponges; brushes (except paintbrushes), brush-making materials; articles for cleaning purposes; steelwool; unworked or semi-worked glass (except glass used in building); glassware, porcelain and earthenware not included in other classes</p> <p>Class 025. First use: Clothing, footwear, headgear</p>		
Attachments	85167257#TMSN.jpeg (1 page)(bytes) Petition to Cancel - Renzi Partners v. Roniza.pdf (41 pages)(3371948 bytes)		

Certificate of Service

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

Signature	/Holly Pekowsky/
Name	Holly Pekowsky, Esq.
Date	08/10/2011

UNITED STATES PATENT AND TRADEMARK OFFICE
TRADEMARK TRIAL AND APPEAL BOARD

In the Matter of

Registration No. 3,530,353
of Roniza S.R.L. dba Modigliani USA Ltd.
for *MODIGLIANI M MODIGLIANI*
Registered on November 11, 2008

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Renzi & Partners S.R.L., : Cancellation No.
 :
Petitioner, : PETITION TO CANCEL
 :
v. :
Roniza S.R.L. dba Modigliani USA Ltd., :
 :
Registrant. :
-----x

In the matter of U.S. Trademark Registration No. 3,530,353 registered on the Principal Register on November 11, 2008 to Roniza S.R.L dba Modigliani USA Ltd. (“Registrant”) for the mark shown below:

modigliani

Modigliani

(the “Accused Mark”) for tableware, namely, knives, forks and spoons in Class 8 and dinnerware, namely, hand crafted, hand painted Italian ceramic household or kitchen containers, dinnerware consisting of mugs, plates, cups, saucers, bowls and serving platters in Class 21, filed March 6, 2008, registered November 11, 2008 and alleging use since June 12, 2003 (the “Subject Registration”).

1. Renzi & Partners S.R.L., an Italian limited liability company with a place of business at 95 Piazza Capranica, Rome, Italy (“Petitioner”) believes that it is or will be damaged by the Subject Registration and, therefore, petitions to cancel the same.

2. Amedeo Clemente Modigliani is a famous Italian-Jewish figurative artist known for paintings and sculptures in a modern style characterized by mask-like faces and elongation of form (“Mr. Modigliani”).

3. Mr. Modigliani worked mostly in France, and lived from 1884 until he died from tubercular meningitis in 1920.

4. Mr. Modigliani is world-famous, including, notably, in the United States.

5. Mr. Modigliani’s fame in the U.S. is evidenced, for example, by the fact that his artwork is on display in several museums in the United States, including the prestigious Guggenheim museum in Manhattan.

6. Mr. Modigliani’s fame in the U.S. is further evidenced, for example, by the fact that two other prestigious art museums, such as the Museum of Modern Art and the Jewish Museum, have organized art exhibits about Mr. Modigliani.

7. Mr. Modigliani’s fame in the U.S. is further evidenced, for example, by the fact that in November of 2010, the leading auction house Sotheby’s sold his painting entitled “La Belle Romain” for \$68.9 million dollars.

8. Petitioner is the owner of all right, title and interest in Mr. Modigliani’s name and the mark MODIGLIANI in the United States.

9. On or about November 2, 2010, Petitioner filed an application to federally register the mark MODIGLIANI (stylized) as shown below:

Indigium

in connection with:

vehicles, apparatus for locomotion by land, air or water in Class 12;

precious metals and their alloys and goods in precious metals or coated therewith, not included in other classes; jewellery, precious stones; horological and chronometric instruments in Class 14;

paper, cardboard and goods made from these materials, not included in other classes; printed matter; bookbinding material; photographs; stationery; adhesives for stationery or household purposes; artists' materials; paint brushes; typewriters and office requisites (except furniture); instructional and teaching material (except apparatus); plastic materials for packaging (not included in the other classes), printers' type; printing blocks in Class 16;

leather and imitations of leather, and goods made of these materials and not included in other classes; animal skins, hides; trunks and travelling bags; umbrellas, parasols and walking sticks; whips, harness and saddler in Class 18;

furniture, mirrors, picture frames; goods (not included in other classes) of wood, cork, reed, cane, wicker, horn, bone, ivory, whalebone, shell, amber, mother-of-pearl, meerschaum and substitutes for all these materials, or of plastics in Class 20; and

household or kitchen utensils and containers (not of precious metal nor coated therewith); combs and sponges; brushes (except paintbrushes), brush-making materials; articles for cleaning purposes; steelwool; unworked or semi-worked glass (except glass used in building); glassware, porcelain and earthenware not included in other classes in Class 21.

10. The aforementioned Application was subsequently assigned Serial No.

85/167,257 ("Petitioner's Application"). A copy of Petitioner's Application is annexed hereto and identified as Exhibit 1.

11. On February 16, 2011, the Trademark Office issued an Office Action refusing to register Petitioner's Application based on a perceived likelihood of confusion with the Subject Registration. A copy of this Office Action is annexed hereto as Exhibit 2.

12. Based on Petitioner's rights to Mr. Modigliani's name and the mark MODIGLIANI in the U.S., as well as the Trademark Office's refusal to register Petitioner's Application based on the Subject Registration, Petitioner has standing to petition to cancel the Subject Registration.

COUNT I

FALSELY SUGGESTS A CONNECTION WITH PERSONS LIVING OR DEAD

13. Petitioner repeats and realleges each and every allegation set forth in the preceding Paragraphs as though fully set forth herein.

14. The Subject Registration should be canceled since the Accused Mark falsely suggests a connection with "persons, living or dead," pursuant to Section 2(a) of the Lanham Act.

15. In particular, the Accused Mark falsely suggests a connection with Mr. Modigliani; whose last name (repeated twice, with the initial of Mr. Modigliani's last name, "M") comprises the Accused Mark.

16. Petitioner owns an exclusive property right to commercially exploit Mr. Modigliani's name and the mark MODIGLIANI in connection with products and services in the United States.

17. By the efforts of Mr. Modigliani and his successors-in-interest to commercially exploit his last name and the tremendous success of artwork displayed and sold under Mr. Modigliani's name, such name/mark now occupies a permanent place in the art world, including in the United States.

18. The Accused Mark was first used in commerce by Registrant in 2003, decades after Mr. Modigliani's name achieved recognition in the U.S.

19. MODIGLIANI is unmistakably associated with, and points uniquely to, Mr. Modigliani.

20. The Accused Mark is identical to Mr. Modigliani's name, in that it consists of Mr. Modigliani's last name repeated twice and "M", the first initial of Mr. Modigliani's last name, and would be recognized as such, in that it points uniquely and unmistakably to Mr. Modigliani.

21. Neither Mr. Modigliani, nor Petitioner, who has the right to commercially exploit Mr. Modigliani's name and the mark MODIGLIANI in the U.S., is connected with the goods sold by Registrant under the Accused Mark. The fame and reputation of Mr. Modigliani is such that, when the Accused Mark is used with Registrant's products, a connection with Mr. Modigliani and/or Petitioner would be presumed.

22. The Accused Mark falsely suggests a connection with Petitioner and/or Mr. Modigliani.

23. The Accused Mark is confusingly similar to Mr. Modigliani's name and would be taken by the public as an endorsement by Mr. Modigliani and/or Petitioner of Registrant's products used in connection with the Accused Mark. Further, any defect, objection or fault found with Registrant's products provided under the Accused Mark would necessarily reflect upon and seriously injure Mr. Modigliani's and/or Petitioner's reputation.

24. Upon information and belief, Registrant was well aware of the fame of Mr. Modigliani prior to filing the Subject Registration, and selected the Accused Mark with the specific intent to falsely suggest a connection with Mr. Modigliani and/or Petitioner.

25. Accordingly, it is Petitioner's belief that Petitioner is and will continue to suffer irreparable harm and damage by registration of the Subject Registration.

COUNT II

LIKELIHOOD OF CONFUSION

26. Petitioner repeats and realleges each and every allegation set forth in the preceding Paragraphs as though fully set forth herein.

27. Petitioner, through its related company, is the owner of the famous trademark MODIGLIANI in connection with promotional and informational/educational services relating to Mr. Modigliani's artwork ("the MODIGLIANI Mark").

28. Petitioner, through its related company, has been promoting and educating people about Mr. Modigliani's artwork under the MODIGLIANI Mark in various countries for many years.

29. Services provided under the MODIGLIANI Mark have been extensively promoted and advertised and have achieved widespread recognition from the trade and the purchasing public.

30. The MODIGLIANI Mark, by reason of the high quality of the services provided under the Mark, has come to be known to the purchasing public as representing services of the highest quality.

31. The fame of the MODIGLIANI Mark is such that, although there have not yet been sales of products under the Mark in the U.S., there is widespread recognition of the Mark within the United States as signifying a particular source of goods and services promoting and educating people about Mr. Modigliani's artwork.

32. Based on the foregoing, the MODIGLIANI Mark has obtained secondary meaning and is famous within the United States, and the Mark and the goodwill associated with it are of inestimable value to Petitioner.

33. Based on the foregoing, the MODIGLIANI Mark qualifies as a famous mark under the “famous marks” doctrine.

34. Many years after Petitioner, through its related company, commenced use of the MODIGLIANI Mark abroad, and long after the Mark acquired secondary meaning and became famous in the U.S., Registrant began using and applied to register the Accused Mark in connection with tableware, namely, knives, forks and spoons in Class 8 and dinnerware, namely, hand crafted, hand painted Italian ceramic household or kitchen containers, dinnerware consisting of mugs, plates, cups, saucers, bowls and serving platters in Class 21.

35. The Accused Mark is confusingly similar to the MODIGLIANI Mark, as both marks consist of MODIGLIANI. The goods and services are related.

36. Registrant’s registration and/or use of the Accused Mark, in view of Petitioner’s priority of use of the MODIGLIANI Mark and the fame of the Mark under the famous marks doctrine, is likely to cause confusion, to cause mistake or to deceive.

37. For at least the reasons stated herein, the continued registration of the Subject Registration is damaging and will continue to damage Petitioner.

COUNT III

DILUTION

38. Petitioner repeats and realleges each and every allegation set forth in the preceding Paragraphs as though fully set forth herein.

39. As a result of extensive sale, advertising and promotion of products and services provided under the MODIGLIANI Mark, the MODIGLIANI Mark is recognized by the trade and purchasing public as synonymous with the highest quality services.

40. The fame of the MODIGLIANI Mark is such that there is widespread recognition of the Mark within the United States as signifying a particular source of services, including, without limitation promoting and educating people about Mr. Modigliani's artwork.

41. The MODIGLIANI Mark is a famous mark - i.e., it is widely recognized by the general consuming public of the United States as a designation of source.

42. The MODIGLIANI Mark is of inestimable value to Petitioner and is relied upon by the trade and the purchasing public to identify and designate Petitioner and its related company's goods and services and to distinguish them from the goods and services of others.

43. Registrant has made or will make commercial use in commerce of the Accused Mark for tableware, namely, knives, forks and spoons in Class 8 and dinnerware, namely, hand crafted, hand painted Italian ceramic household or kitchen containers, dinnerware consisting of mugs, plates, cups, saucers, bowls and serving platters, which is likely to cause dilution to the MODIGLIANI Mark. Specifically, such use is likely to cause dilution of the MODIGLIANI Mark by blurring - i.e., an association arising from the similarity between the Accused Mark and the famous MODIGLIANI Mark that impairs the distinctiveness of the famous MODIGLIANI Mark and/or dilution by tarnishment - i.e., an association arising from the similarity between the Accused Mark and the famous MODIGLIANI Mark that harms the reputation of the famous MODIGLIANI Mark.

44. For at least the reasons stated herein, the continued registration of the Subject Registration is damaging and will continue to damage Petitioner.

COUNT IV

FRAUD ON THE PATENT AND TRADEMARK OFFICE BASED ON FALSE STATEMENTS REGARDING OWNERSHIP

45. Petitioner repeats and realleges each and every allegation set forth in the preceding Paragraphs as though fully set forth herein.

46. Registrant has committed fraud on the Patent and Trademark Office in procuring registration of the Accused Mark.

47. Specifically, on or about March 6, 2008, when Registrant filed the trademark Application which later matured into the Subject Registration, Registrant falsely represented that it owned the Accused Mark. In particular, Registrant falsely represented that it believed it was "entitled to use such mark in commerce" and that "no other person, firm, corporation, or association has the right to use the mark in commerce, either in the identical form thereof or in such near resemblance thereto as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion, or to cause mistake, or to deceive."

48. At the time this false representation was made, Registrant knew that it did not own the Accused Mark, and that, in fact, the Accused Mark uniquely identifies Mr. Modigliani, the famous artist.

49. At the time this false representation was made, Registrant knew that it did not own the Accused Mark, and that, in fact, Petitioner owns the Accused Mark in the U.S.

50. The subject matter of the false representation - *i.e.*, that Registrant is the owner of the Accused Mark - is material to registration of the Accused Mark.

51. Registrant's false representation was made with the intent to deceive the U.S. Patent and Trademark Office.

52. Registrant's false representation was made with the intent to induce authorized agents of the U.S. Patent and Trademark Office to issue the Subject Registration, and reasonably relying upon the truth of said false statement, the U.S. Patent and Trademark Office did, in fact, issue the Subject Registration.

53. Based on the foregoing, it is alleged that Registrant has committed fraud in registration for the Accused Mark.

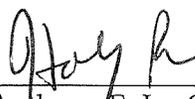
54. For at least the reasons stated herein and based on Petitioner's rights in Mr. Modigliani's name and the mark MODIGLIANI, the continued registration of the Subject Registration is damaging and will continue to damage Petitioner.

WHEREFORE, Petitioner prays that the within Petition be granted and U.S. Trademark Registration No. 3,530,353 be canceled in its entirety.

Respectfully submitted,

AMSTER, ROTHSTEIN & EBENSTEIN LLP
Attorneys for Petitioner
90 Park Avenue
New York, New York 10016
(212) 336-8000

Dated: New York, New York
August 10, 2011

By: 

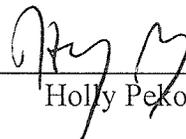
Anthony F. Lo Cicero
Holly Pekowsky

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is one of the attorneys for Petitioner in the above-captioned Cancellation proceeding and that on the date which appears below, she caused copies of the foregoing PETITION TO CANCEL to be served on Registrant and its counsel by FedEx, postage pre-paid, as follows:

Roniza S.R.L.
DBA Modigliani USA Ltd
202 Blackstone Ave.
Ithaca, NY 14850

Charles E. Baxley, Esq.
Hart, Baxley, Daniels & Holton
Suite 403
90 John Street
New York NY 10038



Holly Pekowsky

Dated: New York, New York
August 10, 2011

EXHIBIT 1

Trademark/Service Mark Application, Principal Register

Serial Number: 85167257

Filing Date: 11/02/2010

To the Commissioner for Trademarks:

MARK: MODIGLIANI (stylized and/or with design, see [mark](#))

The literal element of the mark consists of MODIGLIANI.

The mark consists of the word MODIGLIANI stylized, with the letter "M" superimposed over a quadrangular figure in a contrasting shade to the "M".

The applicant, Renzi & Partners S.R.L., a limited liability company legally organized under the laws of Italy, having an address of

95 Piazza Capranica

Rome

Italy

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

International Class 012: Vehicles, apparatus for locomotion by land, air or water

Intent to Use: The applicant has a bona fide intention to use or use through the applicant's related company or licensee the mark in commerce on or in connection with the identified goods and/or services. (15 U.S.C. Section 1051(b)).

Priority based on foreign filing: Applicant has a bona fide intention to use the mark in commerce on or in connection with the identified goods and/or services and asserts a claim of priority based on European Community application number 9156878, filed 06/07/2010. 15 U.S.C. Section 1126(d), as amended. INTENT TO PERFECT 44(d) : At this time, the applicant intends to rely on Section 44(e) as a basis for registration. If ultimately the applicant does not rely on Section 44(e) as a basis for registration, a valid claim of priority may be retained.

International Class 014: Precious metals and their alloys and goods in precious metals or coated therewith, not included in other classes; jewellery, precious stones; horological and chronometric instruments

Intent to Use: The applicant has a bona fide intention to use or use through the applicant's related company or licensee the mark in commerce on or in connection with the identified goods and/or services. (15 U.S.C. Section 1051(b)).

Priority based on foreign filing: Applicant has a bona fide intention to use the mark in commerce on or in connection with the identified goods and/or services and asserts a claim of priority based on European Community application number 9156878, filed 06/07/2010. 15 U.S.C. Section 1126(d), as amended. INTENT TO PERFECT 44(d) : At this time, the applicant intends to rely on Section 44(e) as a basis for

registration. If ultimately the applicant does not rely on Section 44(e) as a basis for registration, a valid claim of priority may be retained.

International Class 016: Paper, cardboard and goods made from these materials, not included in other classes; printed matter; bookbinding material; photographs; stationery; adhesives for stationery or household purposes; artists' materials; paint brushes; typewriters and office requisites (except furniture); instructional and teaching material (except apparatus); plastic materials for packaging (not included in the other classes), printers' type; printing blocks

Intent to Use: The applicant has a bona fide intention to use or use through the applicant's related company or licensee the mark in commerce on or in connection with the identified goods and/or services. (15 U.S.C. Section 1051(b)).

Priority based on foreign filing: Applicant has a bona fide intention to use the mark in commerce on or in connection with the identified goods and/or services and asserts a claim of priority based on European Community application number 9156878, filed 06/07/2010. 15 U.S.C. Section 1126(d), as amended. INTENT TO PERFECT 44(d) : At this time, the applicant intends to rely on Section 44(e) as a basis for registration. If ultimately the applicant does not rely on Section 44(e) as a basis for registration, a valid claim of priority may be retained.

International Class 018: Leather and imitations of leather, and goods made of these materials and not included in other classes; animal skins, hides; trunks and travelling bags; umbrellas, parasols and walking sticks; whips, harness and saddlery

Intent to Use: The applicant has a bona fide intention to use or use through the applicant's related company or licensee the mark in commerce on or in connection with the identified goods and/or services. (15 U.S.C. Section 1051(b)).

Priority based on foreign filing: Applicant has a bona fide intention to use the mark in commerce on or in connection with the identified goods and/or services and asserts a claim of priority based on European Community application number 9156878, filed 06/07/2010. 15 U.S.C. Section 1126(d), as amended. INTENT TO PERFECT 44(d) : At this time, the applicant intends to rely on Section 44(e) as a basis for registration. If ultimately the applicant does not rely on Section 44(e) as a basis for registration, a valid claim of priority may be retained.

International Class 020: Furniture, mirrors, picture frames; goods (not included in other classes) of wood, cork, reed, cane, wicker, horn, bone, ivory, whalebone, shell, amber, mother-of-pearl, meerschaum and substitutes for all these materials, or of plastics

Intent to Use: The applicant has a bona fide intention to use or use through the applicant's related company or licensee the mark in commerce on or in connection with the identified goods and/or services. (15 U.S.C. Section 1051(b)).

Priority based on foreign filing: Applicant has a bona fide intention to use the mark in commerce on or in connection with the identified goods and/or services and asserts a claim of priority based on European Community application number 9156878, filed 06/07/2010. 15 U.S.C. Section 1126(d), as amended. INTENT TO PERFECT 44(d) : At this time, the applicant intends to rely on Section 44(e) as a basis for registration. If ultimately the applicant does not rely on Section 44(e) as a basis for registration, a valid claim of priority may be retained.

International Class 021: Household or kitchen utensils and containers (not of precious metal nor coated therewith); combs and sponges; brushes (except paintbrushes), brush-making materials; articles for cleaning purposes; steelwool; unworked or semi-worked glass (except glass used in building); glassware, porcelain and earthenware not included in other classes

Intent to Use: The applicant has a bona fide intention to use or use through the applicant's related company or licensee the mark in commerce on or in connection with the identified goods and/or services. (15 U.S.C. Section 1051(b)).

Priority based on foreign filing: Applicant has a bona fide intention to use the mark in commerce on or in connection with the identified goods and/or services and asserts a claim of priority based on European Community application number 9156878, filed 06/07/2010. 15 U.S.C. Section 1126(d), as amended.

INTENT TO PERFECT 44(d) : At this time, the applicant intends to rely on Section 44(e) as a basis for registration. If ultimately the applicant does not rely on Section 44(e) as a basis for registration, a valid claim of priority may be retained.

International Class 025: Clothing, footwear, headgear

Intent to Use: The applicant has a bona fide intention to use or use through the applicant's related company or licensee the mark in commerce on or in connection with the identified goods and/or services. (15 U.S.C. Section 1051(b)).

Priority based on foreign filing: Applicant has a bona fide intention to use the mark in commerce on or in connection with the identified goods and/or services and asserts a claim of priority based on European Community application number 9156878, filed 06/07/2010. 15 U.S.C. Section 1126(d), as amended.

INTENT TO PERFECT 44(d) : At this time, the applicant intends to rely on Section 44(e) as a basis for registration. If ultimately the applicant does not rely on Section 44(e) as a basis for registration, a valid claim of priority may be retained.

The applicant's current Attorney Information:

Max Vern and Morton Amster, Daniel Ebenstein, Philip H. Gottfried, Neil M. Zipkin, Anthony F. Lo Cicero, Kenneth P. George, Abraham Kasdan, Ira E. Silfin, Chester Rothstein, Craig J. Arnold, Joseph Casino, Charles R. Macedo, Michael V. Solomita, Holly Pekowsky, Max Vern, Brian Comack, Richard S. Mandaro, Marc J. Jason, David Mitnick, David A. Boag, Matthieu Hausig, Jung Hahm, Alan Miller, Norajean McCaffrey, Marion Metelski, Michael J. Kasdan, Rebecca R. Eisenberg, Benjamin Charkow, Mark Berkowitz, Robert Burak, Liel Hollander, Samuel Lo, Suzue Fujimori, David R. Widomski and Jessica Rasmussen of Amster, Rothstein & Ebenstein LLP

90 Park Avenue

New York, New York 10016

United States

The attorney docket/reference number is 85269/7.

The applicant hereby appoints Max Vern of Amster, Rothstein & Ebenstein LLP

90 Park Avenue

New York New York 10016

United States

as applicant's representative upon whom notice or process in the proceedings affecting the mark may be served.

The applicant's current Correspondence Information:

Max Vern
Amster, Rothstein & Ebenstein LLP
90 Park Avenue
New York, New York 10016
(212) 336-8000(phone)
(212) 336-8001(fax)
ptodocket@arelaw.com (authorized)

A fee payment in the amount of \$2275 has been submitted with the application, representing payment for 7 class(es).

Declaration

The undersigned, being hereby warned that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. Section 1001, and that such willful false statements, and the like, may jeopardize the validity of the application or any resulting registration, declares that he/she is properly authorized to execute this application on behalf of the applicant; he/she believes the applicant to be the owner of the trademark/service mark sought to be registered, or, if the application is being filed under 15 U.S.C. Section 1051(b), he/she believes applicant to be entitled to use such mark in commerce; to the best of his/her knowledge and belief no other person, firm, corporation, or association has the right to use the mark in commerce, either in the identical form thereof or in such near resemblance thereto as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion, or to cause mistake, or to deceive; and that all statements made of his/her own knowledge are true; and that all statements made on information and belief are believed to be true.

Signature: /Max Vern/ Date Signed: 11/02/2010
Signatory's Name: Max Vern
Signatory's Position: Attorney of Record, NY Bar Member

RAM Sale Number: 2085
RAM Accounting Date: 11/03/2010

Serial Number: 85167257
Internet Transmission Date: Tue Nov 02 15:47:49 EDT 2010
TEAS Stamp: USPTO/BAS-208.229.218.102-20101102154749
271687-85167257-470dd47eb809d8fa0a4a178c
f9a522649-DA-2085-20101102153515221497

Indigiani.

EXHIBIT 2

To: Renzi & Partners S.R.L. (ptodocket@arelaw.com) Subject: U.S. TRADEMARK APPLICATION NO. 85167257 - MODIGLIANI - 85269/7 Sent: 2/16/2011 5:51:58 PM Sent ECOM116@USP As:

UNITED STATES PATENT AND TRADEMARK OFFICE (USPTO) OFFICE ACTION (OFFICIAL LETTER) ABOUT APPLICANT'S TRADEMARK APPLICATION

APPLICATION SERIAL NO. 85167257
MARK: MODIGLIANI

85167257

CORRESPONDENT ADDRESS:
MAX VERN
AMSTER,
ROTHSTEIN &
EBENSTEIN LLP
90 PARK AVE
NEW YORK,
NY 10016-1301

CLICK HERE TO RESPOND TO THIS LETTER:

<http://www.uspto.gov/teas/eTEASpageD.htm>

OFFICE ACTION STRICT DEADLINE TO RESPOND TO THIS LETTER TO AVOID ABANDONMENT OF APPLICANT'S TRADEMARK APPLICATION, THE USPTO MUST RECEIVE

APPLICANT'S COMPLETE RESPONSE TO THIS LETTER WITHIN 6 MONTHS OF THE ISSUE/MAILING DATE BELOW. ISSUE/MAILING DATE: 2/16/2011 The referenced application has been reviewed by the assigned trademark examining attorney. Applicant must respond timely and completely to the issue(s) below. 15 U.S.C. §1062(b); 37 C.F.R. §§2.62(a), 2.65(a); TMEP §§711, 718.03.

Registration Refused Under Section 2(d), Confusingly Similar Registration of the applied-for mark is refused because of a likelihood of confusion with the marks in U.S. Registration Nos. 3530353 and 3639980. Trademark Act Section 2(d), 15 U.S.C. §1052(d); see TMEP §§1207.01 et seq. See the enclosed registrations. Please note that the refusal regarding Reg. No. 3530353 applies to applicant's goods in Class 21 only. Also note that the refusal regarding Reg. No. 3639980 applies to applicant's goods in Classes 18 and 25 only. Regarding the issue of likelihood of confusion, all circumstances surrounding the sale of the goods and/or services are considered. See *In re E. I. du Pont de Nemours & Co.*, 476 F.2d 1357, 1361, 177 USPQ 563, 567 (C.C.P.A. 1973). These circumstances include the marketing channels, the identity of the prospective purchasers, and the degree of similarity between the marks and between the goods and/or services. See *Indus. Nucleonics Corp. v. Hinde*, 475 F.2d 1197, 177 USPQ 386 (C.C.P.A. 1973); TMEP §1207.01. In comparing the marks, similarity in any one of the elements of sound, appearance or meaning may be sufficient to find a likelihood of confusion. In *re White Swan Ltd.*, 8 USPQ2d 1534, 1535 (TTAB 1988); In *re Lamson Oil Co.*, 6 USPQ2d 1041, 1043 (TTAB 1987); see TMEP §1207.01(b). In comparing the goods and/or services, it is necessary to show that they are related in some manner. See *On-line Careline Inc. v. Am. Online Inc.*, 229 F.3d 1080, 1086, 56 USPQ2d 1471, 1475 (Fed. Cir. 2000); TMEP §1207.01(a)(vi). Regarding Reg. No. 3530353, the dominant term in the registered mark is identical to the proposed mark, namely, MODIGLIANI. The question is not whether people will confuse the marks, but whether the marks will confuse people into believing that the goods and/or services they identify come from the same source. In *re West Point-Pepperell, Inc.*, 468 F.2d 200, 201, 175 USPQ 558, 558-59 (C.C.P.A. 1972); TMEP §1207.01(b). For that reason, the test of likelihood of confusion is not whether the marks can be distinguished when subjected to a side-by-side comparison. The question is whether the marks create the same overall impression. See *Recot, Inc. v. M.C. Becton*, 214 F.3d 1322, 1329-30, 54 USPQ2d 1894, 1899 (Fed. Cir. 2000); *Visual Info. Inst., Inc. v. Vicon Indus. Inc.*, 209 USPQ 179, 189 (TTAB 1980). The focus is on the recollection of the average purchaser who normally retains a general rather than specific impression of trademarks. *Chemetron Corp. v. Morris Coupling & Clamp Co.*, 203 USPQ 537, 540-41 (TTAB 1979); *Sealed Air Corp. v. Scott Paper Co.*, 190 USPQ 106, 108 (TTAB 1975); TMEP §1207.01(b). Here, the respective marks create the same overall impression through the dominant term MODIGLIANI. Furthermore, the goods of the respective parties are closely related. In a likelihood of confusion analysis, the comparison of the parties' goods is based on the goods as they are identified in the application and registration, without limitations or restrictions that are not reflected therein. *Hewlett-Packard Co. v. Packard Press Inc.*, 281 F.3d 1261, 1267-68, 62 USPQ2d 1001, 1004-05 (Fed. Cir. 2002); In *re Dakin's Miniatures, Inc.*, 59 USPQ2d 1593, 1595 (TTAB 1999); see TMEP §1207.01(a)(iii). In this case, applicant's goods in Class 21 are identified broadly. Therefore, it is presumed that the application encompasses all goods of the type described, including those in the registrant's more specific identification, that the goods move in all normal channels of trade, and that they are available to all potential customers. See *In re La Peregrina Ltd.*, 86 USPQ2d 1645, 1646 (TTAB 2008); In *re Jump Designs LLC*, 80 USPQ2d 1370, 1374 (TTAB 2006); TMEP §1207.01(a)(iii). Accordingly, a likelihood of source confusion exists here. Regarding Reg. No. 3639980, the goods of the respective parties are identical with respect to Class 18, and are complementary with respect to applicant's goods in applicant's Class 25. If the goods of the respective parties are "similar in kind and/or closely related," the degree of similarity between the marks required to support a finding of likelihood of confusion is not as great as would be required with diverse goods and/or services. In *re J.M. Originals Inc.*, 6 USPQ2d 1393, 1394 (TTAB 1987); see *Shen Mfg. Co. v. Ritz Hotel Ltd.*, 393 F.3d 1238, 1242, 73 USPQ2d 1350, 1354 (Fed. Cir. 2004); TMEP §1207.01(b). In a likelihood of confusion analysis, the comparison of the parties' goods is based on the goods as they are identified in the application and registration, without limitations or restrictions that are not reflected therein. *Hewlett-Packard Co. v. Packard Press Inc.*, 281 F.3d 1261, 1267-68, 62 USPQ2d 1001, 1004-05 (Fed. Cir. 2002); In *re Dakin's Miniatures,*

Inc., 59 USPQ2d 1593, 1595 (TTAB 1999); see TMEP §1207.01(a)(iii). In this case, applicant's goods are identified broadly. Therefore, it is presumed that the application encompasses all goods of the type described, including those in the registrant's more specific identification, that the goods move in all normal channels of trade, and that they are available to all potential customers. See *In re La Peregrina Ltd.*, 86 USPQ2d 1645, 1646 (TTAB 2008); *In re Jump Designs LLC*, 80 USPQ2d 1370, 1374 (TTAB 2006); TMEP §1207.01(a)(iii). Furthermore, the applicant's mark is identical to the dominant word portion of the registered mark, namely, MODIGLIANI. The question is not whether people will confuse the marks, but whether the marks will confuse people into believing that the goods and/or services they identify come from the same source. *In re West Point-Pepperell, Inc.*, 468 F.2d 200, 201, 175 USPQ 558, 558-59 (C.C.P.A. 1972); TMEP §1207.01(b). For that reason, the test of likelihood of confusion is not whether the marks can be distinguished when subjected to a side-by-side comparison. The question is whether the marks create the same overall impression. See *Recot, Inc. v. M.C. Becton*, 214 F.3d 1322, 1329-30, 54 USPQ2d 1894, 1899 (Fed. Cir. 2000); *Visual Info. Inst., Inc. v. Vicon Indus. Inc.*, 209 USPQ 179, 189 (TTAB 1980). The focus is on the recollection of the average purchaser who normally retains a general rather than specific impression of trademarks. *Chemetron Corp. v. Morris Coupling & Clamp Co.*, 203 USPQ 537, 540-41 (TTAB 1979); *Sealed Air Corp. v. Scott Paper Co.*, 190 USPQ 106, 108 (TTAB 1975); TMEP §1207.01(b). Here, the respective marks create the same overall impression through the dominant term MODIGLIANI. Accordingly, a likelihood of source confusion exists here. Applicant should note the following additional ground for refusal. Registration Refused Under Section 2(e)(4), Primarily Merely a Surname Registration is refused because the applied-for mark is primarily merely a surname. Trademark Act Section 2(e)(4), 15 U.S.C. §1052(e)(4); see TMEP §1211. The primary significance of the mark to the purchasing public determines whether a term is primarily merely a surname. *In re Kahan & Weisz Jewelry Mfg. Corp.*, 508 F.2d 831, 832, 184 USPQ 421, 422 (C.C.P.A. 1975); *In re Binion*, 93 USPQ2d 1531, 1537 (TTAB 2009); see TMEP §§1211, 1211.01. Please see the attached evidence from WhitePages online, establishing the surname significance of the surname Modigliani. This evidence shows the applied-for mark appearing 32 times as a surname in a nationwide telephone directory of names. Although "Modigliani" appears to be a relatively rare surname, a rare surname may be unregistrable under Trademark Act Section 2(e)(4) if its primary significance to purchasers is that of a surname. E.g., *In re Etablissements Darty et Fils*, 759 F.2d 15, 225 USPQ 652 (Fed. Cir. 1985); *In re Giger*, 78 USPQ2d 1405 (TTAB 2006); see TMEP §1211.01(a)(v). There is no minimum number of telephone directory listings needed to prove that a mark is primarily merely a surname. See TMEP §1211.02(b)(i); see, e.g., *In re Petrin Corp.*, 231 USPQ 902 (TTAB 1986). The following five factors are used to determine whether a mark is primarily merely a surname: (1) Whether the surname is rare; (2) Whether anyone connected with applicant uses the term as a surname; (3) Whether the term has any recognized meaning other than as a surname; (4) Whether the term has the structure and pronunciation of a surname; and (5) Whether the term is sufficiently stylized to remove its primary significance from that of a surname. See *In re Binion*, 93 USPQ2d 1531, 1537 (TTAB 2009); *In re Benthin Mgmt. GmbH*, 37 USPQ2d 1332, 1333-34 (TTAB 1995); TMEP §1211.01. The examining attorney concedes that the surname Modigliani may be somewhat rare. However, surname Modigliani has no meaning other than as a surname; has the structure and pronunciation of a surname; and, is not sufficiently stylized to remove its primary significance from that of a surname. Although applicant's mark has been refused registration, applicant may respond to the refusal(s) by submitting evidence and arguments in support of registration. Informalities Applicant must respond to the requirement(s) set forth below. The identification of goods includes the headings of the international classes. These headings are meant to indicate the subject matter and general scope of each international class of goods. While such broad designations may be sufficient under the trademark laws and practice of other countries, the Office considers them too broad to identify goods or services in a U.S. application. *In re Societe Generale des Eaux Minerales de Vittel S.A.*, 1 USPQ2d 1296, 1298 (TTAB 1986); see TMEP §§1401.08, 1402.01 et seq. Therefore, applicant must amend the goods to specify the common commercial or generic name for each product or service. Below is the acceptable portions, then the unacceptable portions, of the various classes

of goods: Class 12 – Entire identification is unacceptable. Applicant must identify the specific vehicles and apparatus for locomotion by land, air or water by their common commercial names (e.g., automobiles, boats, airplanes). Class 14 – Precious metals and their alloys; jewellery; precious stones; horological and chronometric instruments. Applicant must identify the specific goods in precious metals or coated therewith by their common commercial names (e.g., bracelets, rings, pendants). Class 16 – Paper, cardboard; bookbinding materials; photographs; stationery; adhesives for stationery or household purposes; paint brushes; typewriters; printers' type; printing blocks. Applicant must further identify the following: goods made from [paper and cardboard] (specify, e.g., paper napkins, cardboard boxes); printed matter, namely, [identify type of printed matter, e.g., magazine, books, periodicals] in the field of [identify subject matter of the named printed matter]; artists' materials, namely, [specify, e.g., paint applicators, canvas for painting]; office requisites, namely, [specify, e.g., adhesive tape dispensers, paper embossers]; printed instructional and teaching materials in the field of [identify subject matter]; plastic materials for packaging, namely, [specify, e.g., plastic bubble packs]. Class 18 – Leather and imitation leather; animal skins and hides; trunks and travelling bags; umbrellas, parasols and walking sticks; whips, harnesses and saddlery. Regarding the leather goods, applicant must further identify the goods made of these materials by identify the goods by their common commercial names. Class 20 – furniture, mirrors and picture frames. Applicant must further identify, by their common commercial names, the goods of wood, cork, reed, cane, wicker, horn, bone, ivory, whalebone, shell, amber, mother-of-pearl, meerschaum and substitutes for all these materials, or of plastics. Class 21 – combs; brush-making materials; steelwool; unworked or semi-worked glass. Applicant must further identify the following: containers must be further specified (e.g., containers for household or kitchen use); utensils must be further specified (e.g., kitchen utensils, namely, [specify, e.g., pouring and straining spouts, tongs, splatter screens]); sponges must be further specified (e.g., sponges, namely, scouring sponges, bath sponges, toilet sponges); brushes must be further specified (e.g., brushes, namely, bath brushes, cake brushes, clothes brushes); articles for cleaning purposes must be further specified (e.g., namely, cleaning cloths, cleaning rags, cleaning pads); glassware must be further specified (e.g., namely, beverage glassware); porcelain and earthenware must be further specified by identify the common commercial names for the goods. Class 25 – footwear. Clothing must be identified by specifying the types of clothing (e.g., clothing, namely, shirts, pants, dresses); headgear must be amended to headwear, because headgear may indicate protective articles in Class 9. An applicant may amend an identification of goods only to clarify or limit the goods; adding to or broadening the scope of the goods is not permitted. 37 C.F.R. §2.71(a); see TMEP §§1402.06 et seq., 1402.07 et seq. For assistance with identifying and classifying goods and/or services in trademark applications, please see the online searchable Manual of Acceptable Identifications of Goods and Services at <http://tess2.uspto.gov/netathtml/tidm.html>. See TMEP §1402.04.

Filing Basis The application specifies both an intent to use basis under Trademark Act Section 1(b) and a claim of priority under Section 44(d) based on a foreign application. See 15 U.S.C. §§1051(b), 1126(d); 37 C.F.R. §2.34(a)(2), (a)(4). However, the application does not include a foreign registration certificate or a statement indicating whether applicant intends to rely upon the resulting foreign registration under Section 44(e) as an additional basis for registration. See 15 U.S.C. §1126(e). Although Section 44(d) provides a basis for filing and a priority filing date, it does not provide a basis for publication or registration. 37 C.F.R. §2.34(a)(4)(iii); TMEP §§1002.02, 1003.03. It is unclear whether applicant intends to rely on Section 44(e) as an additional basis for registration. Therefore, applicant must clarify the basis in the application by satisfying one of the following: (1) If applicant intends to rely on Section 44(e), in addition to Section 1(b), as a basis for registration, applicant must so specify. In addition, (i) applicant's country of origin must either be a party to a convention or treaty relating to trademarks to which the United States is also a party, or must extend reciprocal registration rights to nationals of the United States by law; and (ii) applicant must submit a true copy, photocopy, certification or certified copy of the foreign registration from applicant's country of origin. See 15 U.S.C. §1126(b)-(c), (e); 37 C.F.R. §2.34(a)(3)(ii); TMEP §§806.02(f), 1002.01, 1004. A copy of the foreign registration must be a copy of a document that issued to the applicant by or was certified by the intellectual property office in the applicant's country of origin. TMEP §1004.01. If the foreign registration is not written in English, then applicant must provide an

English translation. 37 C.F.R. §2.34(a)(3)(ii); TMEP §1004.01(a)-(b). The translation should be signed by the translator. TMEP §1004.01(b). If the foreign registration has not yet issued, or applicant requires additional time to procure a copy of the foreign registration (and English translation, as appropriate), applicant should respond to this Office action requesting suspension pending receipt of the foreign registration documentation. TMEP §1003.04(b).; or (2) If applicant intends to rely on an intent to use basis under Section 1(b), while retaining its Section 44(d) priority filing date, applicant must specify that it does not intend to rely on Section 44(e) as a basis for registration and request that the mark be approved for publication based solely on the Section 1(b) basis. See TMEP §§806.02(f), 806.04(b), 1003.04(b). Although the mark may be approved for publication on the Section 1(b) basis, it will not register until an acceptable allegation of use has been filed. See 15 U.S.C. §1051(c)-(d); 37 C.F.R. §§2.76, 2.88; TMEP §1103.

Response Advisory For this application to proceed toward registration, applicant must explicitly address each refusal and/or requirement raised in this Office action. If the action includes a refusal, applicant may provide arguments and/or evidence as to why the refusal should be withdrawn and the mark should register. Applicant may also have other options for responding to a refusal and should consider such options carefully. To respond to requirements and certain refusal response options, applicant should set forth in writing the required changes or statements. If applicant does not respond to this Office action within six months of the issue/ mailing date, or responds by expressly abandoning the application, the application process will end, the trademark will fail to register, and the application fee will not be refunded. See 15 U.S.C. §1062(b); 37 C.F.R. §§2.65(a), 2.68(a), 2.209(a); TMEP §§405.04, 718.01, 718.02. Where the application has been abandoned for failure to respond to an Office action, applicant's only option would be to file a timely petition to revive the application, which, if granted, would allow the application to return to live status. See 37 C.F.R. §2.66; TMEP §1714. There is a \$100 fee for such petitions. See 37 C.F.R. §§2.6, 2.66(b)(1).

/Patrick W. Shanahan/ USPTO, L.O. 116 (571) 272-9216 fax (571) 273-9116

TO RESPOND TO THIS LETTER: Use the Trademark Electronic Application System (TEAS) response form at <http://teasroa.uspto.gov/roa/>. Please wait 48-72 hours from the issue/ mailing date before using TEAS, to allow for necessary system updates of the application. For technical assistance with online forms, e-mail TEAS@uspto.gov.

WHO MUST SIGN THE RESPONSE: It must be personally signed by an individual applicant or someone with legal authority to bind an applicant (i.e., a corporate officer, a general partner, all joint applicants). If an applicant is represented by an attorney, the attorney must sign the response.

PERIODICALLY CHECK THE STATUS OF THE APPLICATION: To ensure that applicant does not miss crucial deadlines or official notices, check the status of the application every three to four months using Trademark Applications and Registrations Retrieval (TARR) at <http://tarr.uspto.gov/>. Please keep a copy of the complete TARR screen. If TARR shows no change for more than six months, call 1-800-786-9199. For more information on checking status, see <http://www.uspto.gov/trademarks/process/status/>.

TO UPDATE CORRESPONDENCE/E-MAIL ADDRESS: Use the TEAS form at <http://www.uspto.gov/teas/eTEASpageE.htm>.

Print: Feb 15, 2011

77410711

DESIGN MARK

Serial Number

77410711

Status

REGISTERED

Word Mark

MODIGLIANI M MODIGLIANI

Standard Character Mark

No

Registration Number

3530353

Date Registered

2008/11/11

Type of Mark

TRADEMARK

Register

PRINCIPAL

Mark Drawing Code

(3) DESIGN PLUS WORDS, LETTERS AND/OR NUMBERS

Owner

Roniza S.R.L. Corp. Italy DBA Modigliani USA Ltd CORPORATION ITALY 202
Blackstone Ave. Ithaca NEW YORK 14850

Goods/Services

Class Status -- ACTIVE. IC 008. US 023 028 044. G & S: Tableware,
namely, knives, forks and spoons. First Use: 2003/06/12. First Use
In Commerce: 2003/06/12.

Goods/Services

Class Status -- ACTIVE. IC 021. US 002 013 023 029 030 033 040 050.
G & S: Dinnerware, namely, hand crafted, hand painted Italian ceramic
household or kitchen containers, dinnerware consisting of mugs,
plates, cups, saucers, bowls and serving platters. First Use:
2003/06/12. First Use In Commerce: 2003/06/12.

Description of Mark

The mark consists of the word "Modigliani" in script (cursive) across
the top, the letter "M" in an oval in the middle and the word
"Modigliani" in italicized aerial font along the bottom.

Colors Claimed

Print: Feb 15, 2011

77410711

Color is not claimed as a feature of the mark.

Translation Statement

"MODIGLIANI" has no meaning in a foreign language.

Filing Date

2008/03/02

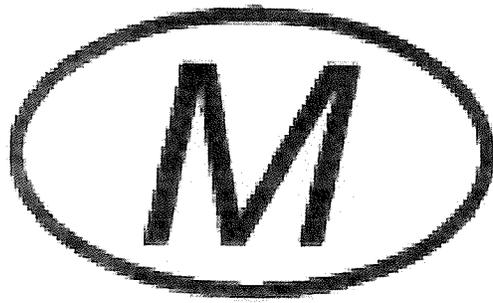
Examining Attorney

VALLILLO, MELISSA

Attorney of Record

Charles E. Baxley, Esquire

modigliani



Modigliani

Print: Feb 15, 2011

76661722

DESIGN MARK

Serial Number
76661722

Status
REGISTERED

Word Mark
MODIGLIANI

Standard Character Mark
No

Registration Number
3639980

Date Registered
2009/06/16

Type of Mark
TRADEMARK

Register
PRINCIPAL

Mark Drawing Code
(5) WORDS, LETTERS, AND/OR NUMBERS IN STYLIZED FORM

Owner
COCOS INTERNATIONAL TRADING INC. CORPORATION CALIFORNIA 4609 S.
ALAMEDA ST. LOS ANGELES CALIFORNIA 90058

Goods/Services
Class Status -- ACTIVE. IC 018. US 001 002 003 022 041. G & S:
Travel bags, travel bags made of leather; luggage trunks and valises,
garment bags for travel, vanity-cases sold empty; rucksacks, shoulder
bags, handbags; attache-cases, briefcases, drawstring pouches, pocket
wallets, purses, umbrellas, business card cases made of leather or of
imitation leather, credit card cases made of leather or of imitation
leather; calling card cases made of leather or of imitation leather;
all of the foregoing not relating to sports or a sports team. First
Use: 2008/11/01. First Use In Commerce: 2008/11/15.

Colors Claimed
Color is not claimed as a feature of the mark.

Filing Date
2006/06/16

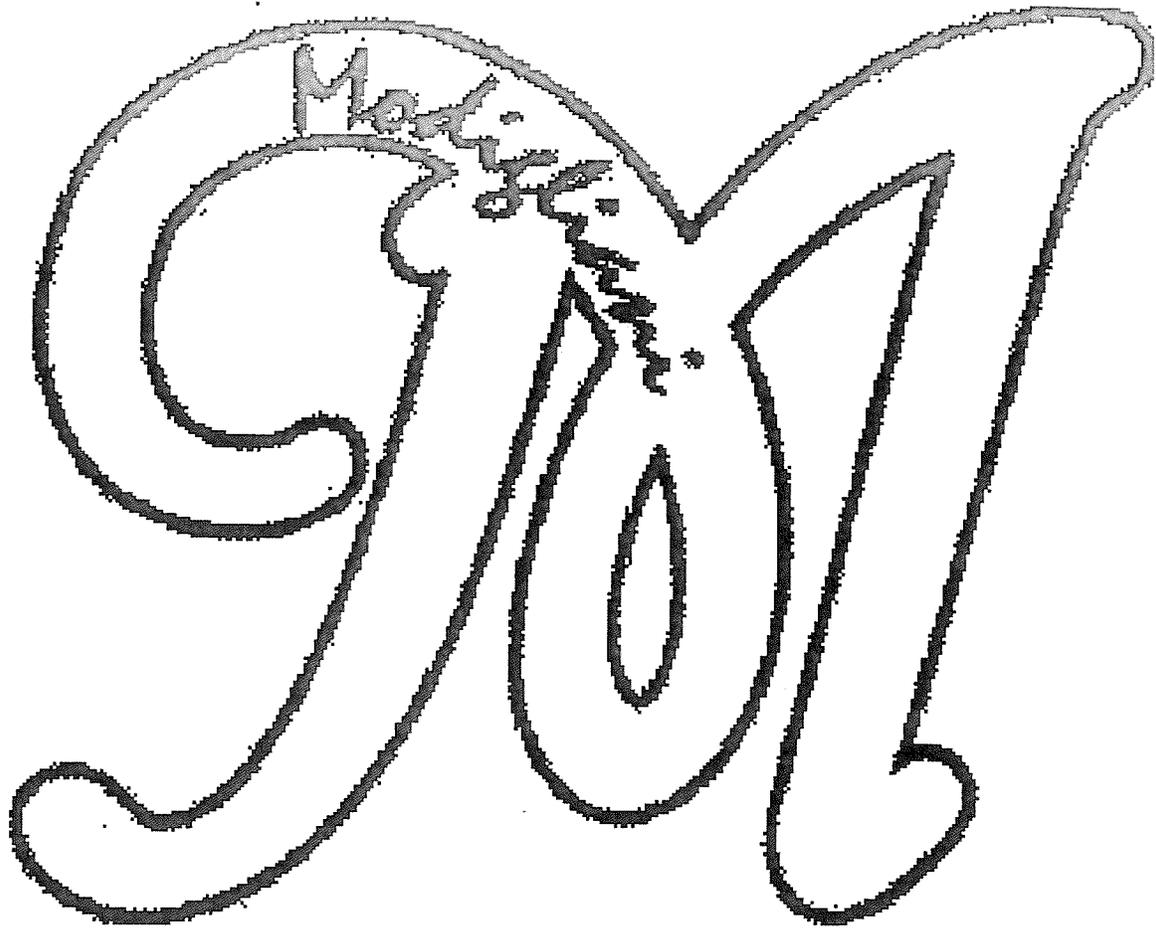
Examining Attorney

Print: Feb 15, 2011

76661722

PERKINS, ELLEN

Maxine

A large, stylized cursive letter 'M' is the central focus. The letter is drawn with a thick, dark line and features elegant flourishes, including a large loop on the left side and a smaller loop at the bottom right. Inside the upper curve of the 'M', the name 'Maxine' is written in a smaller, matching cursive script. The background is plain white.



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(Age 25-29)

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Brookline, MA
Prior: Chilmark, MA
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Leah Modigliani
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Andrea Modigliani
(Age 65+)

Asa Gray Dr
Ann Arbor, MI

Associated people:
Carol A Novak
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Annabella M Modigliani
(Age 65+)

Brentwood Cir
North Andover, MA

Associated people:
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David S Modigliani
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Leah Modigliani
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David Modigliani

San Saba St
Austin, TX

Associated people:
unknown
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David S Modigliani
(Age 45-49)

Brentwood Cir
North Andover, MA

Associated people:
Lazzaro G Modigliani

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You? Claim & edit >>	Kathy Modigliani	Brooks Ave Arlington, MA	Associated people: unknown Full listing >>

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F Modigliani	Cambridge, MA	92		View Details

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Sarah Modigliani Hallar	45	Massachusetts		View Details
Julia Modigliani	44	Belmont, MA		View Details
Marta A Modigliani	47	New Hampshire		View Details

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You? Claim & edit >>	Lazzaro G Modigliani (Age 65+)	Brentwood Cir North Andover, MA	Associated people: Annabella M Modigliani David S Modigliani Click to see more
Full listing >>			

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You? Claim & edit >>	Leah Modigliani (Age 40-44)	1st St Brooklyn, NY	Associated people: Simone Modigliani Click to see more
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Leah Modigliani

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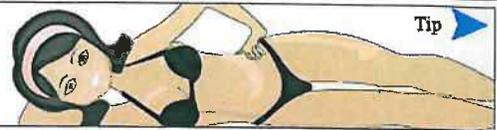
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[Marta A Modigliani](#) 47 New Hampshire



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