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Karen C. Hall  
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Karen C. Hall  
Signature

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

CARTIER INTERNATIONAL B.V.  
*Opposer,*

v.

TRINITY FELLOWSHIP CHURCH  
*Applicant.*

Opposition No. \_\_\_\_\_

Serial Number: 76/507,680  
Mark: TRINITY FELLOWSHIP

**NOTICE OF OPPOSITION**

In the matter of Application Serial No. 76/507,680 for registration of the claimed mark TRINITY FELLOWSHIP for "magazines, books, booklets, pamphlets, brochures, bulletins, newsletters, reports, study guides, workbooks, catalogs, leaflets, flyers, and printed educational materials, all in the fields of Christianity, religion, theology, spirituality, ethics, culture, and social issues; Bibles, pencils, note cards, note pads, stationery, paper pads, envelopes, paper banners, paper signs; song books; address books; posters; greeting cards; occasion cards; paper labels; postcards; calendars; notebooks; anniversary books; appointment books; autograph books; baby books; children's books; children's activity books; date books; engagement books; hymn books; prayer books; telephone number books; wedding books; wirebound books; and

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Christmas cards,” which Application was filed on April 18, 2003 by Trinity Fellowship Church (“Applicant”), and which was published in the Official Gazette on July 6, 2004;

Cartier International B.V., a company duly organized and existing under the laws of The Netherlands, with a principal place of business at 436 Herengracht, Amsterdam 1017 B.Z., The Netherlands, believes it will be damaged by registration of the mark, and hereby opposes the same.

The grounds for this opposition are as follows:

1. Since at least as early as 1983, Cartier International B.V., itself or through its predecessors in interest and related companies (collectively “Opposer”), has been engaged in the production and sale of luxury items for personal use under the unique and distinctive mark TRINITY. Through the continued and exclusive use of the mark TRINITY in connection with exquisite luxury items by Opposer, Opposer has built a world-renowned and profitable business in connection therewith, and has developed a reputation for premium, high quality products.

2. The mark TRINITY is arbitrary and distinctive as applied to the goods of Opposer.

3. Opposer is the owner of various U.S. Trademark Registrations on the Principal Register in the United States Patent and Trademark Office for the mark TRINITY, including the following Registrations which are valid and subsisting:

<b>MARK</b>	<b>REG. NO.</b>	<b>REG. DATE</b>	<b>GOODS</b>
<b>TRINITY</b>	1,927,987	October 17, 1995	Jewelry made of precious metal or coated therewith

<b>MARK</b>	<b>REG. NO.</b>	<b>REG. DATE</b>	<b>GOODS</b>
<b>TRINITY</b>	2,243,233	May 14, 1999	Watches
<b>TRINITY</b>	2,527,0098	January 8, 2002	Diaries; writing instruments, namely fountain pens, ball-point pens, pencils, felt-tip pens, rollerballs, document markers

4. By reason of Opposer's continued and exclusive use, promotion and advertising of the mark TRINITY in the United States and throughout the world, the mark TRINITY has become identified and recognized as a mark for high quality luxury goods originating exclusively with Opposer.

5. Opposer's said mark TRINITY always has been used by Opposer for the purpose of identifying Opposer's goods, and the exclusive use by Opposer of the mark TRINITY distinguishes Opposer's goods, such that the trade and purchasing public have come to know and recognize the mark TRINITY as identifying the goods as those of Opposer.

6. Applicant proposes to use the mark TRINITY FELLOWSHIP in connection with a host of goods in International Class 16, including pencils, stationery, note cards, note pads, paper pads, envelopes, paper banners, paper signs, address books, posters, greeting cards, occasion cards, paper labels, postcards, calendars, notebooks, anniversary books, appointment books, telephone number books and Christmas cards.

7. Applicant's mark TRINITY FELLOWSHIP is virtually identical to and incorporates entirely Opposer's marks TRINITY, such that in the minds of consumers, Applicant's mark will conjure an association with Opposer.

8. The goods with which Applicant proposes to use the mark TRINITY FELLOWSHIP are the same as or overlap significantly with Opposer's goods, such that in the minds of consumers, Applicant's mark will conjure an association with Opposer.

9. Applicant's mark TRINITY FELLOWSHIP is confusingly similar in sight, sound and commercial impression to Opposer's mark TRINITY, such that there is a substantial likelihood that consumers will be confused by Applicant's use of the mark TRINITY FELLOWSHIP in connection with Applicant's goods. Therefore, Opposer would be irreparably harmed and damaged.

WHEREFORE, Opposer prays that the registration sought by Applicant be refused and that this Opposition be sustained.

Dated: November 1, 2004

Respectfully submitted,  
GOODWIN PROCTER LLP

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

Jessica L. Rothstein

GOODWIN PROCTER LLP  
599 Lexington Avenue  
New York, New York 10022  
Tel: (212) 813-8800  
Fax: (212) 355-3333

*Attorneys for Opposer  
Cartier International B.V.*

GOODWIN PROCTER

Jessica L. Rothstein  
212.459.7447  
jrothstein@  
goodwinprocter.com

Goodwin Procter LLP  
Counsellors at Law  
599 Lexington Avenue  
New York, NY 10022  
T: 212.813.8800  
F: 212.355.3333

TTAB

November 1, 2004

**Via Express Mail**

Box TTAB/FEE  
Assistant Commissioner for Trademarks  
2900 Crystal Drive  
Arlington, VA 22202-3514

**Re: Serial Number: 76/507,680**  
**Mark: TRINITY FELLOWSHIP**

Dear Sir or Madam:

Enclosed please find for filing in the Trademark Trial and Appeal Board:

1. Notice of Opposition (Original and Two Copies); and
2. Return Receipt Postcard.

To confirm filing, kindly date-stamp the enclosed self-addressed stamped postcard and forward it to this office by return mail.

Kindly charge the applicable filing fees for the enclosed filings to Goodwin Procter LLP Deposit Account No. 06-0923. A copy of this letter is enclosed.

Please contact Jessica L. Rothstein at (212) 459-7447 if you have any questions regarding the enclosed materials. Thank you for your attention to this matter.

Very truly yours,

Jessica L. Rothstein

Enclosures

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Date of Deposit November 1, 2004

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Karen C. Hall

(Signature of person mailing paper or fee)



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