

ESTTA Tracking number: **ESTTA352885**

Filing date: **06/15/2010**

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

Proceeding	91170091
Party	Defendant TSA Corporate Services, Inc.
Correspondence Address	BRIAN D. WASSOM HONIGMAN MILLER SCHWARTZ AND COHN LLP 2290 FIRST NATIONAL BUILDING DETROIT, MI 48226 UNITED STATES tmdocketing@honigman.com,mlisi@honigman.com,bwassom@honigman.com
Submission	Defendant's Notice of Reliance
Filer's Name	Brian D. Wassom
Filer's e-mail	tmdocketing@honigman.com,bdw@honigman.com,mlisi@honigman.com
Signature	/Brian D. Wassom/
Date	06/15/2010
Attachments	2010-06-15 our NOR 10 and Exs 71-80.pdf (37 pages)(1590238 bytes)

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

ALPINA, TOVARNA OBUTVE, D.D., ZIRI,

Opposer,

v.

TSA CORPORATE SERVICES, INC.

Applicant.

Opposition No. 91170091

Applications Serial Nos.

78445593 (ALPINE DESIGN &
DESIGN)

78445587 (ALPINE DESIGN)

APPLICANT’S NOTICE OF RELIANCE #10

Pursuant to 37 CFR § 2.122(e) and TBMP 704.08, Applicant TSA Stores, Inc. f/k/a TSA Corporate Services, Inc. (“TSA”) hereby submits, and gives its notice of reliance on, the following printed publications, as generally relevant to the *duPont* likelihood of confusion factors specified below:

<u>Publication</u>	<u>Likelihood of Confusion Factor</u>	<u>Ex</u>
EyeWearTown.com – Alpina Sunglasses http://www.eyewearstown.com/base.asp?txtBrandingID=144&s=35&k=AlpinaSunglasses Printed June 13, 2010	Number and nature of similar marks in use on similar goods Lack of confusion	71
EyeWearTown – Alpina Magnum Ski Goggles http://www.eyewearstown.com/prod.asp?PrdID=34187&txtBrandingID=144&txtCodeColor=&cboCategory=1 Printed June 13, 2010	Number and nature of similar marks in use on similar goods Lack of confusion	72
EyeWearTown – Contact Us & About Us http://www.eyewearstown.com/contact_us.asp and http://www.eyewearstown.com/about_us.asp June 13, 2010	Number and nature of similar marks in use on similar goods Lack of confusion	73
Google Results Showing EyeWearTown Sponsored Advertising for Keyword “Alpina Eyewear” http://www.google.com/search?hl=en&clien	Number and nature of similar marks in use on similar goods Lack of confusion	74

<p>t=firefox-a&hs=vBy&rls=org.mozilla%3Aen-US%3Aofficial&q=alpina+eyewear+united+states&aq=f&aqi=&aql=&oq=&gs_rfai= Printed June 13, 2010</p>		
<p>Amazon.com results for Alpina food products http://www.amazon.com/s/ref=bl_sr_grocery?ie=UTF8&search-alias=grocery&field-brandtextbin=Alpina Printed June 13, 2010</p>	<p>Number and nature of similar marks in use on similar goods Lack of confusion</p>	75
<p>Amazon order page showing Alpina food products are sold in the United States http://www.amazon.com/gp/offer-listing/B002ZEGREM/ref=dp_olp_0?ie=UTF8&redirect=true&qid=1276476728&sr=1-3&condition=all Printed June 13, 2010</p>	<p>Number and nature of similar marks in use on similar goods Lack of confusion</p>	76
<p>Amazon results for Alpina watches http://www.amazon.com/gp/search/?brand=Alpina&ref=bl_sr_watches&node=377110011 Printed June 13, 2010</p>	<p>Number and nature of similar marks in use on similar goods Lack of confusion</p>	77
<p>Alpina Rex Headband/Scarf http://www.amazon.com/Alpina-Headband-Scarf-WHITE-Size/dp/B000J39B0I/ref=sr_1_32?ie=UTF8&s=apparel&qid=1276477256&sr=8-32 Printed June 13, 2010</p>	<p>Number and nature of similar marks in use on similar goods Lack of confusion</p>	78
<p>Vixen's Alpina Model Binoculars http://www.amazon.com/Vixen-1442-Alpina-10x42-Binoculars/dp/B001KW07LE/ref=sr_1_35?ie=UTF8&s=electronics&qid=1276477578&sr=8-35 Printed June 13, 2010</p>	<p>Number and nature of similar marks in use on similar goods Lack of confusion</p>	79
<p>FieldSheer Womens Alpina Leather Jacket http://www.motorcyclecloseouts.com/women/womens+leather+motorcycle+jacket/field_sheer_womens+alpina+leather+jacket Printed June 13, 2010</p>	<p>Number and nature of similar marks in use on similar goods Lack of confusion</p>	80

Respectfully submitted,

HONIGMAN MILLER SCHWARTZ AND COHN LLP

Dated: June 15, 2010

By: /s/ Brian D. Wassom

Michael A. Lisi (P39597)
38500 Woodward Avenue, Suite 100
Bloomfield Hills, MI 48304-5048
(248) 566-8504
mlisi@honigman.com

Brian D. Wassom (P60381)
2290 First National Building
Detroit, MI 48226-3506
(313) 465-7594
bdw@honigman.com

CERTIFICATE OF FILING AND SERVICE

I hereby certify that on June 15, 2010, I caused the foregoing document to be filed with the Board using the ESTTA system. I further caused a copy to be served on opposing counsel by U.S. Mail at the following address:

Marsha G. Gentner
Matthew J. Cuccias
Jacobson Holman PLLC
400 - 7th Street, NW
Washington, DC 20004

By: /s/ Brian D. Wassom

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ALPINA model MAGNUM color A7014031

Color Code: A7014031 **Rimless:** No
Lense Color: black **Frame Color:** quattroflex
Frame Size: 0 x 0 x 0 **Gender:** Unisex



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ALPINA A7014031
black
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Grocery & Gourmet Food

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- Breakfast Foods (11)
- Candy (1)
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- Snack Food (1)

Specialty

Any Specialty

- Low-Fat (1)
- Natural (1)

Brand

< Any Brand

Alpina

Avg. Customer Review

Any Avg. Customer Review

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by Alpina

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Alpina

Watch Feature

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Chronograph (3)

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Availability

Include Out of Stock

Watches > Alpina

Showing 13 Results

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Alpina Avalanche Extreme Diver 48 mm Watch - Black Dial, Black Rubber Strap AL-525LBB5AEV6

~~\$2,590.00~~ **\$2,070.00**

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Alpina AI-650Ibbb3ae6b Avalanche Extreme Regulator Mens Watch

~~\$2,725.00~~ **\$1,762.59**

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~~\$2,276.00~~ **\$1,399.00**

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~~\$2,190.00~~ **\$1,349.00**

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Alpina AI-700Isss4a6 Chronograph Autom

~~\$2,090.00~~ **\$1,299.00**

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Alpina AI-550Ib4r26 Startimer Gmt Automatic Mens Watch

~~\$2,090.00~~ **\$1,299.00**

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8.



Alpina AI-650Ibss4a6b Avalanche Regulator Mens Watch

~~\$1,775.00~~ **\$1,099.00**

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9.



Alpina AI-525Ibs5ae6 Extreme Automatic M

~~\$1,775.00~~ **\$1,099.00**

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10.



11.



12.



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★★★★★ (686) \$25.20
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Alpina Rex Headband/Scarf

Other products by [Overland Sheepskin Co](#)

No customer reviews yet. [Be the first.](#) | [More about this product](#)

Price: **\$35.00**

[Special Offers Available](#)

To Buy, Add to Shopping Cart

Color: White

In Stock.

Ships from and sold by [Overland Sheepskin Co.](#)

See [pricing and availability chart](#) for details.

Only 2 left in stock--order soon.

\$35.00 + \$5.00 shi

In Stock. Sold by **Overland Co.**

Quantity:

or

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Father's Day Sale on Clothing

\$10 off \$50 orders or \$20 off \$100 orders on select clothing Direct from Amazon.com and eligible for FREE Super Saver Shipping. [Shop the sale](#)

Special Offers and Product Promotions

Buy from Overland Sheepskin Co.:

- Get free shipping on this item when you spend \$100.00 or more on Qualifying Items offered by Overland Sheepskin [Here's how](#) (restrictions apply)

Product Features

- fur

Product Description

Product Description

Silky soft and stylish, our Alpina Rex Headband/Scarf is one of winter's most versatile accessories. Made of luxurious Rex it features a ladder loop design with a pompom at each end for easy closure and a perfect fit. Best of all -- it can be worn eit scarf or a headband. 28" x 3". Imported.

Search terms: Ladies Rex Headband, Ladies Rex Rabbit Scarf, Rabbit Headband, Rabbit Scarf, Headbang Scarf, scarves

Product Details

Shipping Information: [View shipping rates and policies](#)

ASIN: B000J39B26

Average Customer Review: No customer reviews yet. [Be the first.](#)

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Vixen 1442 Alpina 10x42 DCF Binoculars

by [VIXEN](#)

([1 customer review](#))

List Price: ~~\$279.00~~

Price: **\$239.00** & this item ships for **FREE with Super Saver Shipping**. [Details](#)

You Save: **\$40.00 (14%)**

In Stock.

Ships from and sold by **Amazon.com**. Gift-wrap available.

Only 1 left in stock--order soon (more on the way).

Want it delivered Tuesday, June 15? Order it in the next 21 hours and 53 minutes, and choose **One-Day Shipping** at checkout. [Details](#)

2 new from **\$239.00**

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Technical Details

- 6 Degree field-of-view at 10x power.
- Close Focus 4 yds
- Weight: 23.6 oz
- LIFETIME WARRANTY

> [See more technical details](#)

Product Details

Product Dimensions: 6.5 x 3 x 8.2 inches ; 2 pounds

Shipping Weight: 3 pounds ([View shipping rates and policies](#))

Shipping: Currently, item can be shipped only within the U.S.

ASIN: B001KW07LE

Item model number: 1442

Average Customer Review: ([1 customer review](#))

Amazon Bestsellers Rank: #186,708 in Electronics ([See Top 100 in Electronics](#))

Date first available at Amazon.com: June 17, 2003

Would you like to [update product info](#), [give feedback on images](#), or [tell us about a lower price?](#)

Product Description

Product Description

The Alpina models are Vixen's top of the line in a roof-prism, waterproof binocular. Phase coating improves viewing with all optics fully multi coated. Long eye relief adds to your viewing enjoyment. These binoculars are nitrogen filled and fully waterproof.

Buy This Product and Related Accessories



Vixen 1442 Alpina 10x42 DCF Binoculars

~~\$279.00~~ **\$239.00**

Most Popular

Quantity:

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Adorama Camera

~~\$279.00~~ + Free Shipping

2 new from **\$239.00**

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[SquareTrade 3-Year Electronics Warranty \(\\$200-250 Items\)](#)

(19)
\$32.99 **\$29.99**
In Stock from SquareTrade.



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\$39.99
In Stock from NEW Customer Service Companies, Inc.



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Average Customer Rating

(1 customer review)

- 5 star: (1)
- 4 star: (0)
- 3 star: (0)
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- 1 star: (0)

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Great quality Japanese optics at a reasonable price,

July 23, 2009

By [Robert C. Gregg](#) - [See all my reviews](#)**This review is from: Vixen 1442 Alpina 10x42 DCF Binoculars (Electronics)**

These are my favorite binoculars. The optics are fantastic, Vixen calls it "Phase Coating", and "Full Multicoating" in a compact package, and at a reasonable price. They are comparable to some "Name Brands" that cost a lot more. Actually, Vixen is one of the top brands in Japan, just not in the USA. Highly recommended, try them and you will not be dissappointed in the quality or the optics.

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Search all Amazon discussions

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FieldSheer Womens Alpina Leather Jacket

Retail: \$299.99
Closeout: \$139.99
Savings: \$160.00

Please select COLOR Please select SIZE

1 Qty.



Shell/Liner:

- 1.2-1.4mm race quality soft drum-dyed cowhide
- Elasticized stretch panels in front and back of shoulders, back sides and elbow areas
- Removable Hydro Pilot jacket liner which can be worn as a jacket separately
- Adjustable waist strap and gusseted zipped hip adjustment
- Zippered wrist cuff with Velcro enclosure
- 8" waist zipper and universal snap belt connector for attaching to pants

Safety:

- Removable CE approved armor in back, shoulders and elbows
- Double layered leather in elbows

Ventilation:

- RAM AIR ventilation system
- 2 front intake vents allow fresh air in
- 2 rear exhaust vents allow stale air out

Pockets:

- 2 zippered front hand warmers
- 1 zippered map
- 1 inside Velcro
- 1 for mobile phone

Certifications/Warranty:

- CE approved armor
- 1 year limited manufacturer's warranty

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BLACK CREME Black Back

Similar Items



Shift Womens Siren Leather Jacket - 2010
\$399.95

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\$12.99



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\$12.99



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