

**Opposition: 91200843**

**Serial: 77.910.862**

**Trademark: LA RIOJA**

**LA RIOJA IMPORT EXPORT LLC**

**Applicant,**

**V.**

**Comunidade Consejo Regulador**

**de la Denominacion de Origen**

**Rioja**

**Opposer,**

**LA RIOJA IMPORT & EXPORT LLC, based out of  
11900 Biscayne Blvd #104, North Miami, FL 33181 United  
States, is a company belonging to the Gonzalez family,  
named Grupo LA RIOJA, originating in Sao Paulo, Brazil.**

The story of La Rioja, [http://www.larioja.com.br/nossa\\_historia.php](http://www.larioja.com.br/nossa_historia.php) starts in the 1940's, with a vegetable stand in Central Market in Sao Paulo, selling coconuts, onions and vegetables. At the time, this market supplied the kitchen of the Armed Forces of Sao Paulo (current military police), military, schools and other establishments.

The 1990's were very important for the Gonzalez family with the founding of the first shop La Rioja. The third generation of family, hard work and dedication has given a significant boost to business and started what today is Grupo La Rioja. The origin of the name La Rioja is due to the sympathy he feels for the family of the same name within the Argentine region, home to a vast plantation of olives of excellent quality.

Currently the plant is located in the city Aluminio-SP and all the warehousing and logistics operation is

implemented in its own distribution center with 30,000 m2 located in the suburb of Mooca, in Sao Paulo.

The Group's activities are present in La Rioja's various market segments: import and distribution of food and fine beverages, fish processing and industrialization, agribusiness, construction, import of tires, auto dealers and trucking cargo.

**COMPANY PHILOSOPHY:**

**L**ealdade and transparency

**A**pprentice, change and continuous improvement

**R**espect for human beings and the environment

**I**ntegridade and honesty

**O**rganisation as a basis for quality

**J**ustice and truth

**A**ct with pro-activity

**GROUP COMPANIES:**



*La Rioja*



With the increasing success of the products and brands of the Group, founded in 2002 is the first store Emporium La Rioja, located in the district of Light in Sao Paulo. Three years later, the city of Campos do Jordao, considered by its climate as the Brazilian Switzerland, wins the second store. In 2007, a new store in São Paulo, in the borough of Brooklyn, would expand the Emporio Rioja to the south of the city.

[www.emporiolarioja.com.br](http://www.emporiolarioja.com.br)



La Rioja Group company dedicated to import and distribute wines from the Old and New World and fine drinks.

[www.malbecdobrasil.com.br](http://www.malbecdobrasil.com.br)



Acquired in 2006 by Grupo La Rioja, the Pala d'oro has tradition and quality in the segment since 1968 preserves fine.

[www.paladoro.com.br](http://www.paladoro.com.br)



One of the biggest importers of cod in Latin America, La Rioja group acquired control of Dupatta Industry and Trade of Foods, importer and processor of seafood products, and pioneer in the production of desalted frozen snacks in Brazil. With product lines Dupatta - Chef of the Dry Sea Salt, desalted and Frozen Snacks - La Rioja complements its product portfolio and further expands its business in Brazil with high quality items. The line "Chef of the Seas" is composed of desalted cod fillet and frozen, fillet, slices, and shredded. And the same cuts are also offered with dried fish and salted and vacuum packed. The line of snacks presents the codfish balls, practical and ready for consumption. La Rioja to invest in developing technologies to launch new products in this

market segment. For the food service industry, cod Dupatta offers customization of cuts, quality assurance and cooking their own packaging, allowing the pricing of a menu item safe. Dupatta products have competitive advantages in the market, such as freezing that is done by the cryogenic process, which keeps the flavor, texture, freshness and all the nutrients of the product, plus 100% of use and convenience as the cod comes clean therefore there is no loss of fish.

[www.dupatto.com.br](http://www.dupatto.com.br)

There are several other segments in which we operate, such as transportation, distribution center, agribusiness, car dealer, the complete list can be found at website:

<http://www.larioja.com.br/empresas.php>

<http://www.larioja.com.br/empresas.php>

### **Socio-Environmental Responsibility:**

The plant, located in the city of Aluminio-SP, has two treatment plants: one of water filtration system of last generation, which gives more crystallinity and purity of water can be returned to nature, preserving the environment; station and a 100% recycling of products that are considered unfit for sale, the result is reversed in employee benefits.

### **Fractionation and packaging:**

Located in Aluminum, São Paulo, the slicing and packaging plant of La Rioja is responsible for packing and packing of all products. Investing heavily in infrastructure and machinery with latest technology, you get an output of more than one thousand tons / month.

Installed in a total area of 23,000 square meters, the company has 200 employees who are responsible for

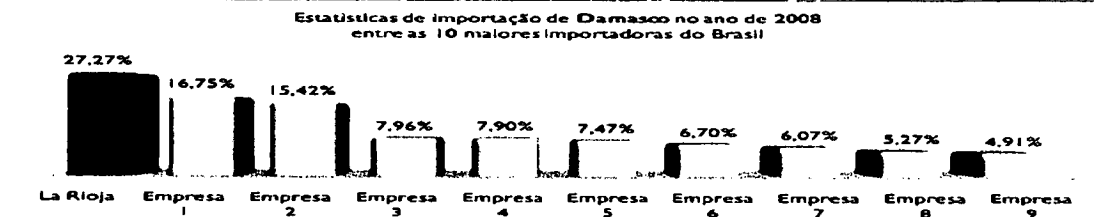
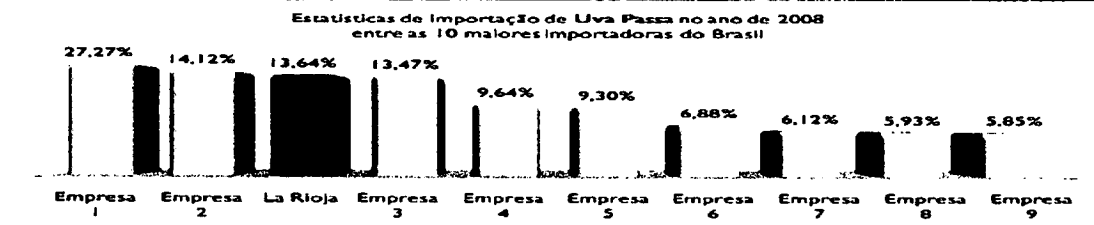
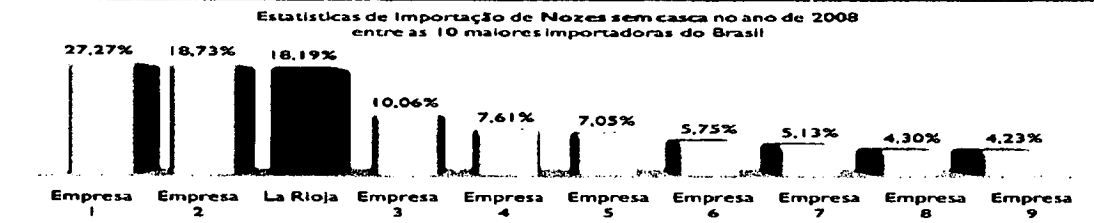
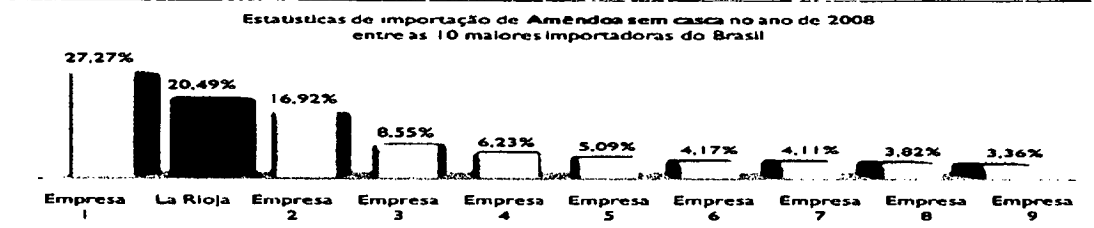
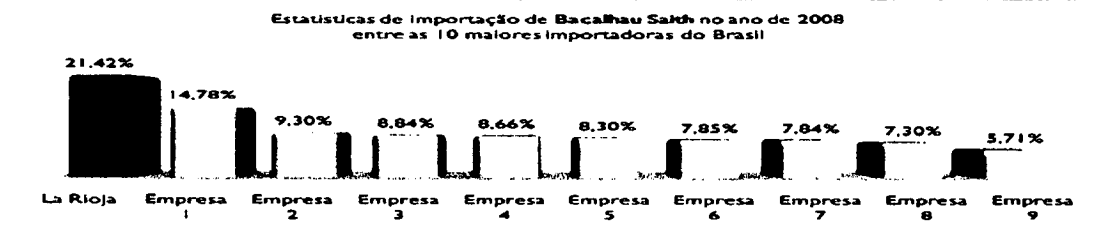
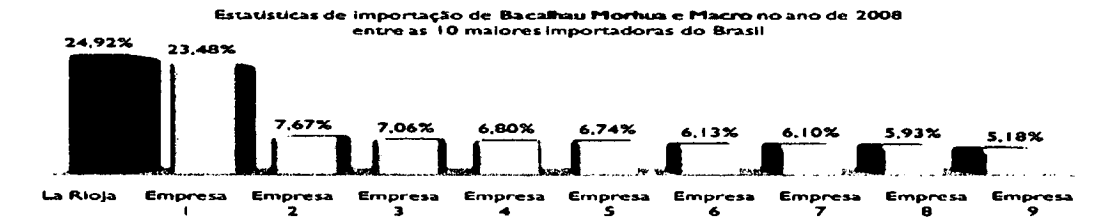


processing approximately 138 items with 614 variations of packaging, within strict standards of quality and hygiene.

"Within one year, we were able to make the plant of La Rioja one of the most modern industries in the sector as a result of the union between experience and willingness to work for the whole team," said Paul Jimenez, responsible for the unit.

Considered one of the largest importers of oil due to the variety of brands featured in the national market, La Rioja at its plant has a storage capacity of 300 tons of the product.

## Some statistics:



Without doubt, Brazil, today, while its economy is strong, and while the crisis that occurred in previous years in Brazil, Grupo La Rioja grew much more compared to its competitors. Today with so many multi-national companies and being internationally known, Grupo La Rioja is situated in the ranking of tax collection from Sao Paulo (Brazil's main trading hub) at No. 113th.

And on the world stage Grupo La Rioja, has main position of cod fish, in the purchase of the entire country of Norway. Like many other companies and producers and farmers, the group now is "his main and biggest consumer".

**OPPOSITION AS PRESENTED:**

The opponent "Consejo Regulador de la denominacion of origen Rioja" presented as a basis although some aspects may be truthful, they do not have grounds for opposition and delay. The

Grupo La Rioja, through the company's LA RIOJA IMPORT & EXPORT LLC, perform strong investment, and contribute to help the economy, jobs, and especially the welfare of the people involved directly or indirectly with the company, reasons that:

1. The opposition states that the first wine, originating in the province, was 1925, but only mentions the date and region of production, we have no proof that the name used to be La Rioja season, but probably, as usual the time, was probably Family XXXX, or Reserve XXXX,
2. In 1991, atingio called "Qualifiers", but that brings an important question: the products quality and excellence, was not recognized in their own country after nearly 70 years?
3. The opponents also mention a decision from the European Court, dated May 16, 2000, 75 years after the supposed date of the first wine. "RIOJA name is in Spanish regulation Recognized as a public asset" that is in Spain, not in the

United States. "Whose is Exclusively reserved to use the Producers of the local wine" here only refers to the wine, which we will see below, that the authorities themselves opposing establish or do not know, consent is not what these products.

4. Applicant also refers to a strong group renowned in Brazil when identifying their products, but, mistakenly, did not originate from Spain, nor that region, to take advantage and deceive consumers.
5. Return to the products, dozens of products besides wine, without specifying them, and that they cannot coexist, but the oppose claims that they've been together since the 1940's.
6. Remember also that based on region, as mentioned by the opponent, Argentina also has a region called La Rioja, and not only as Rioja in Spain. There, it is located in the capital, Buenos Aires 1.167km, the region is also "known for its

production olives and wine.”

**The Applicant denies the allegations of the Opposer's**

**Notice of Opposition,**

1. Grupo La Rioja, has a record date prior to the opponents, including the trademark registered in the Federative Republic of Brazil.
2. The opponent has no trademark registration until the moment before that renowned organ.
3. Among the opponents from under the same claim based on the origin Spanish La Rioja region, they do not have the same understanding regarding the types of products, such as the opponent for this product would be the most important wine, already to the next opponent, even mention this product.
4. All the essentials are from other countries or origins, which can not be greater than the decision of that renowned origin of the United States.

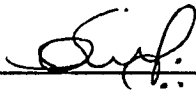
5. The Opposition could have made a market search of its alleged exclusive products, and would have found that the Group La Rioja already conducts business with major producers in the region, and even some of them produce especially for Applicant, as the producer of wines Urbezo .

The Applicant pleads that the name of his company, which is already properly regulated by the state of Florida, defer to its trademark, so that the important Grupo La Rioja can begin operations within this largest and most important market.

And therefore, would not suspend relations with producers and traders of the region from Spain, but increase their sales, and generate various other businesses, jobs and development both in Spain, Brazil, and especially the United States America.

I HEREBY CERTIFY that a true and correct copy of foregoing has been furnished via U.S. Mail to Justin R. Young, Dineff

Trademark Kaw Limited, 160 North Wacker Drive, Chicago, IL  
60606, this 10 day of September, 2011.

By: 

Pablo Porto - President

La Rioja Import & Export LLC

11900 Biscayne Blvd #104

North Miami, FL 33181

(305) 403-1370