

ESTTA Tracking number: **ESTTA705744**

Filing date: **10/30/2015**

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

Proceeding	91209815
Party	Plaintiff Cartier International A.G.
Correspondence Address	JOHN P MARGIOTTA FROSS ZELNICK LEHRMAN & ZISSU PC 866 UNITED NATIONS PLAZA NEW YORK, NY 10017 UNITED STATES jmargiotta@fzlz.com, eweiss@fzlz.com, ykarzoan@fzlz.com
Submission	Plaintiff's Notice of Reliance
Filer's Name	John P. Margiotta
Filer's e-mail	jmargiotta@fzlz.com, eweiss@fzlz.com, ykarzoan@fzlz.com
Signature	/John P. Margiotta/
Date	10/30/2015
Attachments	Opposer's Notice of Reliance on Deposition Testimony and Exhibit 38 Part 1 (PUBLIC).PDF(5530797 bytes ) Exhibit 38 Part 2 to Opposer's Notice of Reliance on Deposition Testimony (PUBLIC).pdf(5234285 bytes )

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

CARTIER INTERNATIONAL A.G.,

Opposer,

v.

LANCE COACHMAN,

Applicant.

Opposition No. 91/209815

**OPPOSER'S NOTICE OF RELIANCE ON DEPOSITION TESTIMONY**

Pursuant to Rule 2.120(j) of the Trademark Rules of Practice and Section 704.09 of the Trademark Trial and Appeal Board Manual of Procedure, Opposer Cartier International A.G. hereby makes of record and notifies Applicant Lance Coachman ("Applicant") of its reliance on the following excerpts from the discovery deposition of Applicant, taken September 16, 2014, which are attached hereto as **Exhibit CT 38**:

- Page 10, line 23 through page 11, line 13.
- Page 11, lines 24-25.
- Page 12, lines 7-9 and 19-25.
- Page 14, line 24 through page 15, line 22.
- Page 17, line 25 through page 19, line 19.
- Page 20, line 6 through page 21, line 9.
- Page 21, line 17 through page 22, line 2.
- Page 22, line 14 through page 23, line 4.
- Page 23, line 19 through page 24, line 6.
- Page 36, line 20 through page 37, line 3.

- Page 37, lines 8-12.
- Page 42, line 20 through page 43, line 14.
- Page 46, line 14 through page 48, line 5.
- Page 52, line 24 through page 53, line 3.
- Page 54, lines 17-21.
- Page 55, lines 3-15.
- Page 62, line 17 through page 70, line 7.
- Page 71, line 10 through page 78, line 9.
- Page 80, lines 19 through page 86, line 4.
- Page 86, line 15 through page 87, line 18.
- Page 113, lines 11-25.

Dated: New York, New York  
October 30, 2015

FROSS ZELNICK LEHRMAN & ZISSU, P.C.

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

John Margiotta

Emily Weiss

866 United Nations Plaza

New York, New York 10017

Tel: (212) 813-5900

Email: [jmargiotta@fzlz.com](mailto:jmargiotta@fzlz.com)

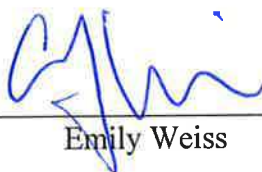
[eweiss@fzlz.com](mailto:eweiss@fzlz.com)

*Attorneys for Opposer Cartier International A.G.*

**CERTIFICATE OF SERVICE**

I hereby certify that I caused, on this 30th day of October 2015, a copy of the foregoing **Opposer's Notice of Reliance on Deposition Testimony** to be sent by FedEx overnight delivery in an envelope addressed to counsel for Lance Coachman:

Reginald J. Hill, Esq.  
D. Matthew Feldhaus, Esq.  
Jenner & Block LLP  
353 N. Clark Street  
Chicago, IL 60654-3456



---

Emily Weiss



# **EXHIBIT CT 38**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

CARTIER INTERNATIONAL A.G.,

Opposer,

vs.

Opposition Number  
91209815

LANCE COACHMAN,

Applicant.

~~~~~

DEPOSITION OF

LANCE COACHMAN

September 16, 2014

9:24 a.m.

Suite 2700

101 Marietta Street, N.W.

Atlanta, Georgia

Richard Bursky, RMR, CRR, CCR-2509

APPEARANCES OF COUNSEL

On behalf of the Opposer:

FROSS ZELNICK LEHRMAN & ZISSU, P.C.  
EMILY WEISS, ESQUIRE  
866 United Nations Plaza at  
First Avenue & 48th Street  
New York, New York 10017  
212.813.8188  
eweiss@frosszelnick.com

On behalf of the Applicant:

JENNER & BLOCK  
REGINALD J. HILL, ESQUIRE  
353 North Clark Street  
Chicago, Illinois 60654-3456  
312.222.9350  
rhill@jenner.com

INDEX OF EXAMINATION

WITNESS: LANCE COACHMAN

| EXAMINATION  | PAGE    |
|--------------|---------|
| By Ms. Weiss | 5,141   |
| By Mr. Hill  | 138,141 |

INDEX TO EXHIBITS

| Cartier Exhibit | Description                                                                            | Page |
|-----------------|----------------------------------------------------------------------------------------|------|
| 1               | Photo, Applicant 0018                                                                  | 14   |
| 2               | Photo, Applicant 0019                                                                  | 17   |
| 3               | Photo, Applicant 0020                                                                  | 20   |
| 4               | Applicant's Response to Opposer's First Set of Interrogatories, 16 pages               | 22   |
| 5               | Email and photos, Applicant 0001 through 17                                            | 27   |
| 6               | Western Union money transfers, Applicant 0021 and 22                                   | 39   |
| 7               | Handwritten notes of Mr. Coachman, Applicant 0024                                      | 42   |
| 8               | Pages printed out from a Coach website, CART 000114 through 143                        | 49   |
| 9               | Pages printed out from a Gucci website, CART 000144 through 189                        | 50   |
| 10              | Pages printed out from a Chanel website, CART 000033 through 107 and 000029 through 32 | 51   |
| 11              | Copy of a receipt from Mr. Cuero, Applicant 0029 and 31                                | 52   |

INDEX TO EXHIBITS

| Cartier Exhibit | Description                                                                                   | Page |
|-----------------|-----------------------------------------------------------------------------------------------|------|
| 12              | Copies of receipts, Applicant 0022 through 30                                                 | 56   |
| 13              | Printout of Tweets, Applicant 0060 through 95                                                 | 86   |
| 14              | Printout from the TrinityWerks website, Applicant 0034 through 36                             | 108  |
| 15              | Handwritten notes of Mr. Coachman, Applicant 0058                                             | 117  |
| 16              | TM-Edition, International Catalogue of Trademarks-2012, Applicant 0057                        | 124  |
| 17              | Trademark Safeguard-Trademark Monitoring Service, Applicant 0059                              | 125  |
| 18              | Pages printed from a Cartier website, CART 000668 through 704                                 | 128  |
| 19              | Request for Extension of Protection, Serial Number 79116170, filing date 07/10/2012, 12 pages | 134  |

(Original exhibits have been attached to the original transcript.)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Q. Are you familiar with a company called  
TrinityWerks, W-E-R-K-S?

A. I am.

1 Q. What is your relationship to that company?

2 A. I set it up.

3 Q. You understand that you are answering  
4 questions today on behalf of TrinityWerks as well as  
5 yourself?

6 A. Yes.

7 Q. What is the corporate form of TrinityWerks?

8 A. It is incorporated.

9 Q. So it is incorporated with the State of  
10 Georgia?

11 A. I think so. I have to -- I don't remember,  
12 but I believe it is. It is in the early stages of  
13 formation, I will put it that way.

14

15

16

17

18

19

20

21

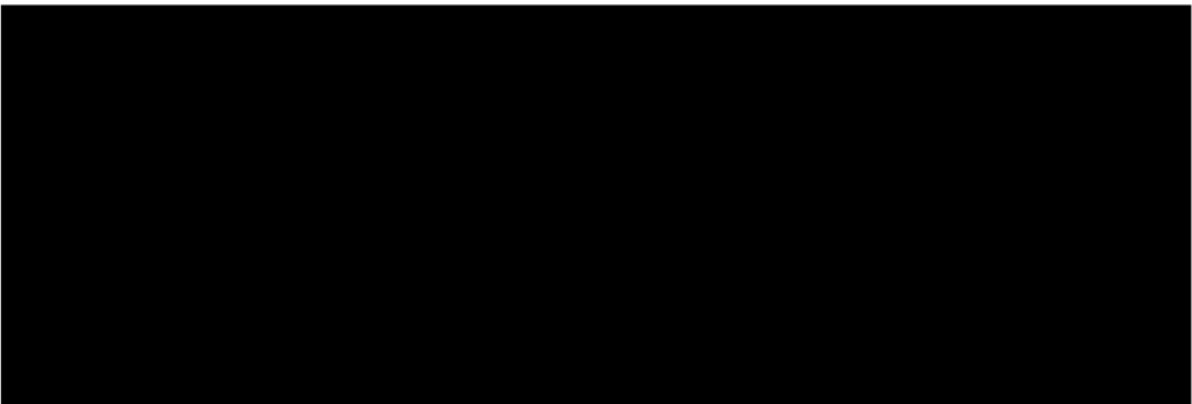
22

23

24 Q. When was TrinityWerks founded?

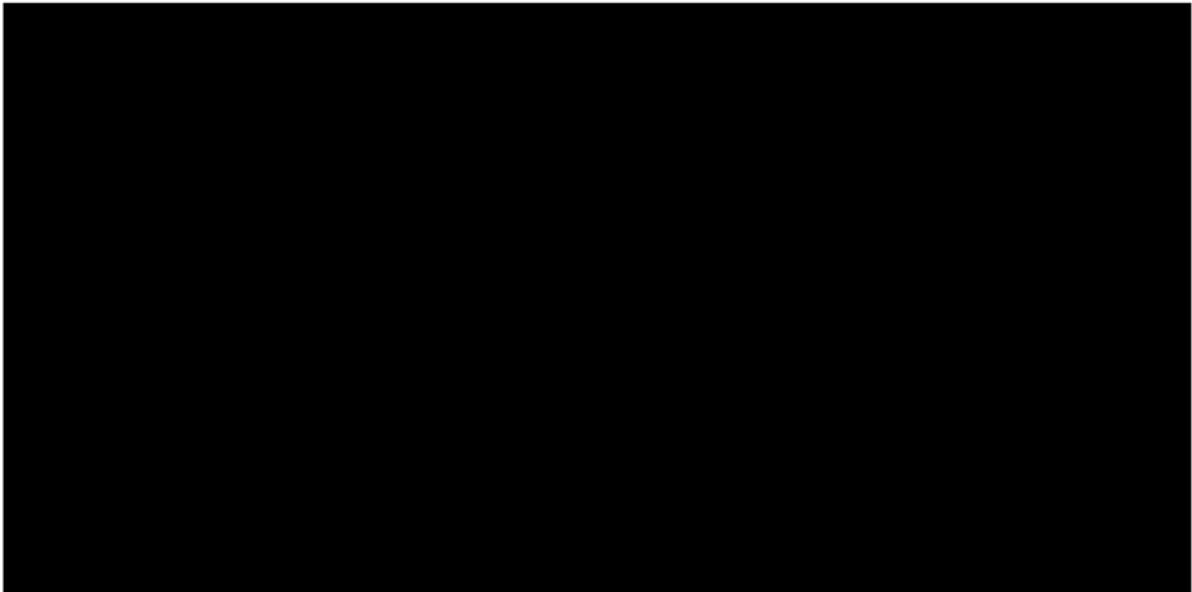
25 A. In 2012.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25



Q. What is the general business of TrinityWerks?

A. To distribute ladies' handbags and subsequent other leather goods as we develop additional lines.



Q. Is anyone else involved with this company other than you?

A. No.

Q. So no employees?

A. No.

Q. No officers?

A. No.



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Q. (By Ms. Weiss) I am showing you what has been  
marked as Cartier Exhibit 1. Have you seen this

1 document before?

2 (Witness reviewing document.)

3 A. I have seen the bags before.

4 Q. Can you please identify what is shown in  
5 Cartier Exhibit 1?

6 A. These are Trinity bags.

7 Q. Are they currently being offered for sale?

8 A. They are.

9 Q. When were they first offered for sale?

10 A. 2011.

11 Q. Do they come in any other colors?

12 A. They come in three colors. These are the  
13 three colors.

14 Q. Could you state the colors for the record?

15 A. Black, tan and wine.

16 Q. Do these bags come in any other sizes?

17 A. No.

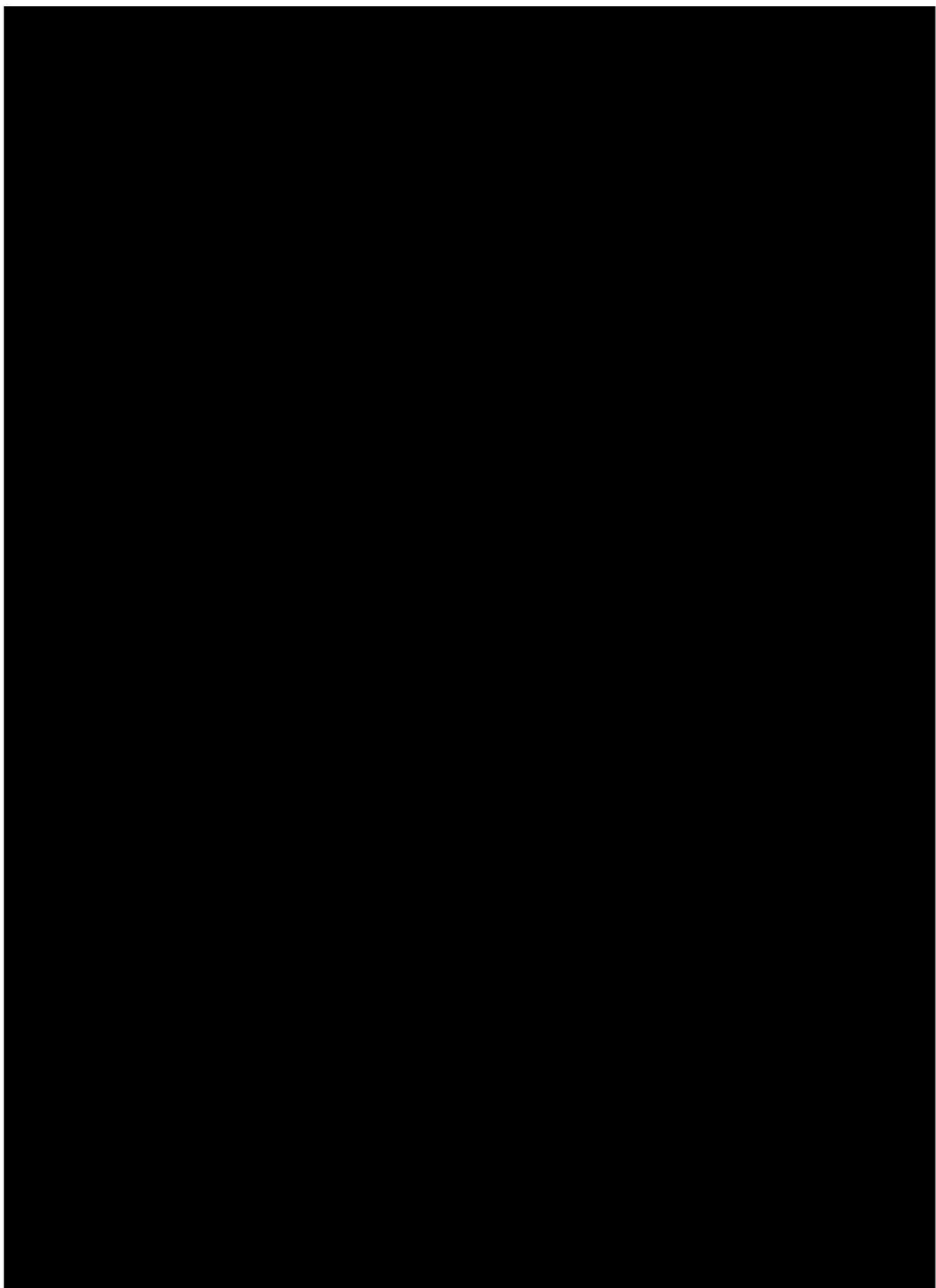
18 Q. Does Trinity appear anywhere on these bags?

19 A. It does.

20 Q. Where does it appear?

21 A. There is a Trinity logo on the front and then  
22 there is a Trinity mark on the tag.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25



Q. (By Ms. Weiss) I am showing you what has been

1 marked as Cartier Exhibit 2. Have you seen the handbag  
2 shown in this document before?

3 A. It is an overnight bag but I have seen it.

4 Q. Is it a bag that is made by you or  
5 TrinityWerks?

6 A. Actually, it is a bag that I plan to go to  
7 market with but I have not done anything with it. It  
8 is a prototype.

9 Q. So is it currently being offered for sale?

10 A. No.

11 Q. So is the bag shown in this exhibit just a  
12 sample?

13 A. I guess it is a sample.

14 Q. How many were made?

15 A. Four.

16 Q. You said you intend to offer it for sale; is  
17 that right?

18 A. That is in the future growth plans for  
19 TrinityWerks and Trinity bags.

20 Q. When do you intend to offer it for sale?

21 A. After I have a distribution deal, a national  
22 distribution deal for Trinity bags, then I have a plan  
23 to come up with two other lines and that's one of the  
24 lines.

25 Q. Do you have any idea around when that will be?

1 A. I don't know. Things are being negotiated now  
2 so I would say in the next six months.

3 Q. Will it come in any other colors?

4 A. It will.

5 Q. Which ones?

6 A. There's going to be a brown, a black and a  
7 wine.

8 Q. Will it come in any other sizes?

9 A. Probably not.

10 Q. Does Trinity appear anywhere on this bag?

11 A. It does not.

12 Q. Will it appear anywhere on the bag?

13 A. It will.

14 Q. Where will it appear?

15 A. On the tag and on the, there is a place right  
16 under the buckle where the logo goes.

17 Q. So will the word Trinity appear in both  
18 locations?

19 A. It will.

20

21

22

23

24

25



1  
2  
3  
4  
5  
6 Q. (By Ms. Weiss) I am showing you Cartier  
7 Exhibit 3. Have you seen the bag shown in this exhibit  
8 before?

9 A. Yes. This is the prototype for the G model.

10 Q. The G model?

11 A. (Indicating affirmatively.)

12 Q. Like the letter G?

13 A. (Indicating affirmatively.)

14 Q. Is this bag currently offered for sale?

15 A. It is not.

16 Q. So is the bag shown in this exhibit just a  
17 sample?

18 A. It is.

19 Q. How many were made?

20 A. Four.

21 Q. Do you intend to offer this bag for sale?

22 A. I do.

23 Q. When?

24 A. In about six months.

25 Q. Will it come in any other colors?

1 A. It will.

2 Q. Which ones?

3 A. It will come in blue, it will come in this,  
4 tan and black.

5 Q. So --

6 A. This is an olive, I guess is the color for  
7 that.

8 Q. So in addition to this olive color --

9 A. I plan to have three other colors.



17 Q. (By Ms. Weiss) Will it come in any other  
18 sizes?

19 A. No.

20 Q. And will Trinity appear anywhere on this bag?

21 A. It will.

22 Q. Where will it appear?

23 A. It will appear down here and also have a tag.

24 Q. When you say down here, where do you mean?

25 A. On the body of the bag.

1 Q. So the word Trinity will appear in two places?

2 A. Yes.



14 Q. (By Ms. Weiss) I am showing you what has been  
15 marked as Cartier Exhibit 4. Have you seen this  
16 document before?

17 A. No.

18 Q. So I will represent to you that it is  
19 Applicant's responses to Opposer's first set of  
20 interrogatories in this proceeding. Did you  
21 participate in drafting the responses to these  
22 interrogatories?

23 A. I don't --

24 MR. HILL: Take a look at the document.

25 Let him take a look at the document. He

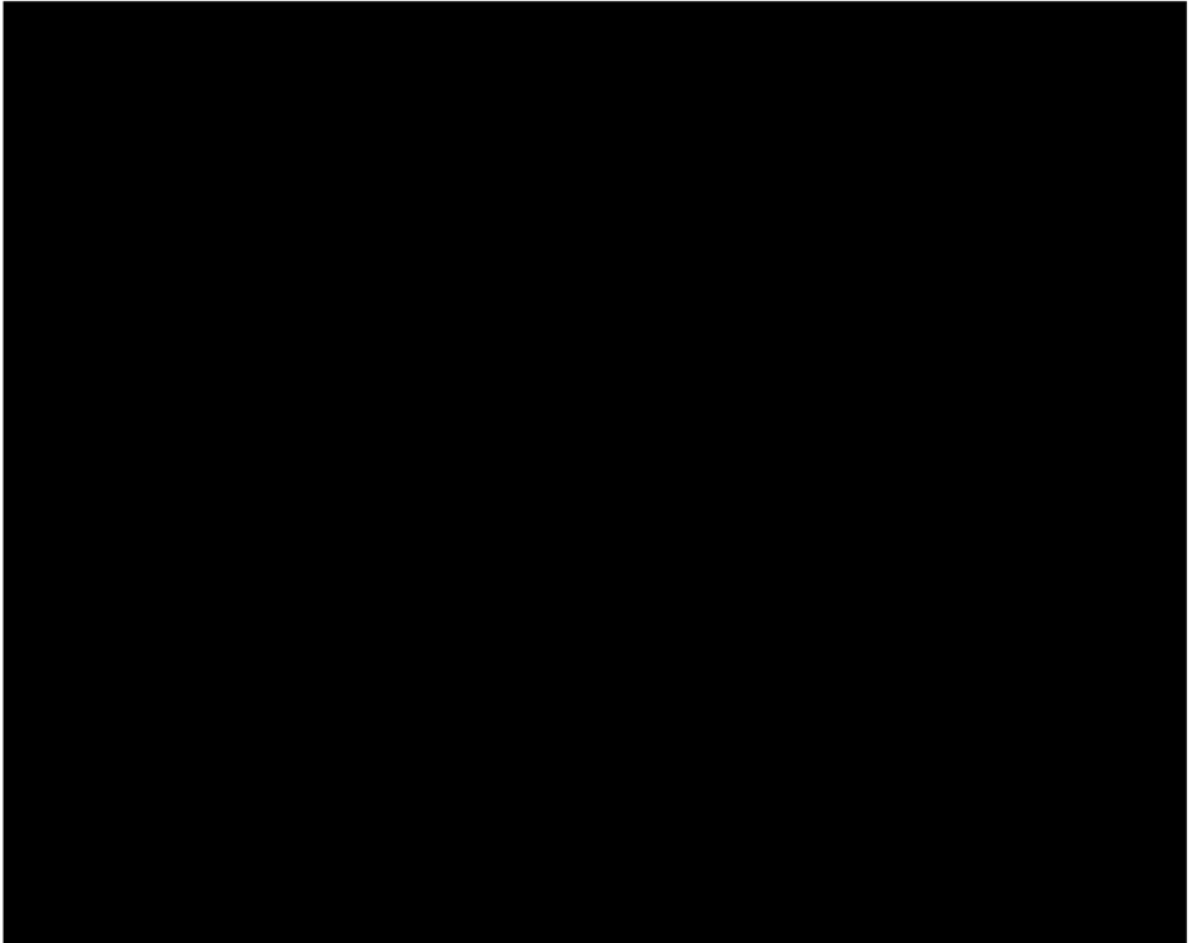


1 hasn't looked at it.

2 THE WITNESS: Okay.

3 (Witness reviewing document.)

4 A. Okay, I did participate, yes.



19 Q. Please look at the response to Interrogatory  
20 No. 1 which spans the bottom of Page 2 to the top of  
21 Page 3. Look at the sentence at the top of Page 3 and  
22 do you see where it says, "Applicant currently produces  
23 and sells one style of leather handbags in three  
24 colors."

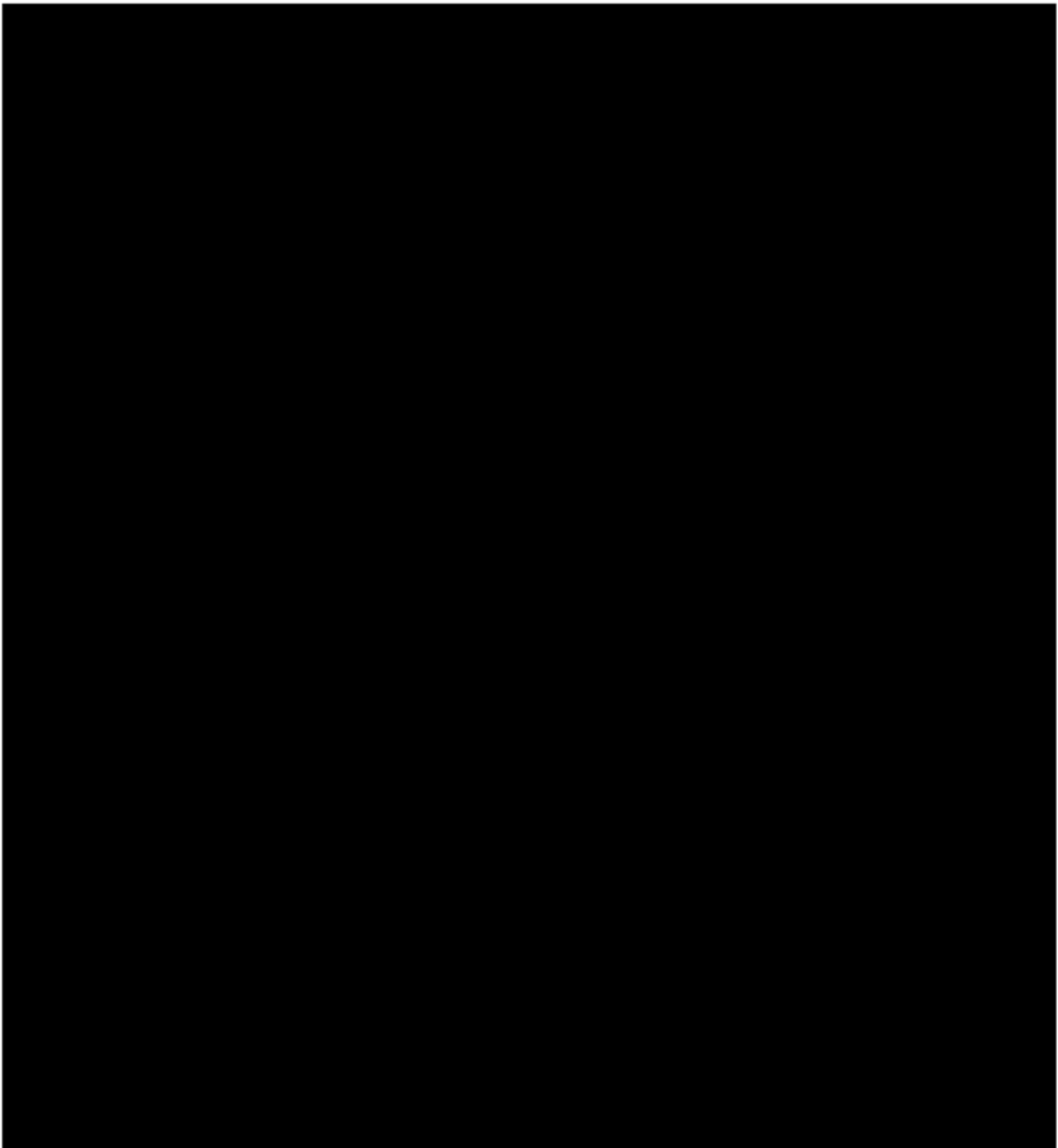
25 A. Yes.

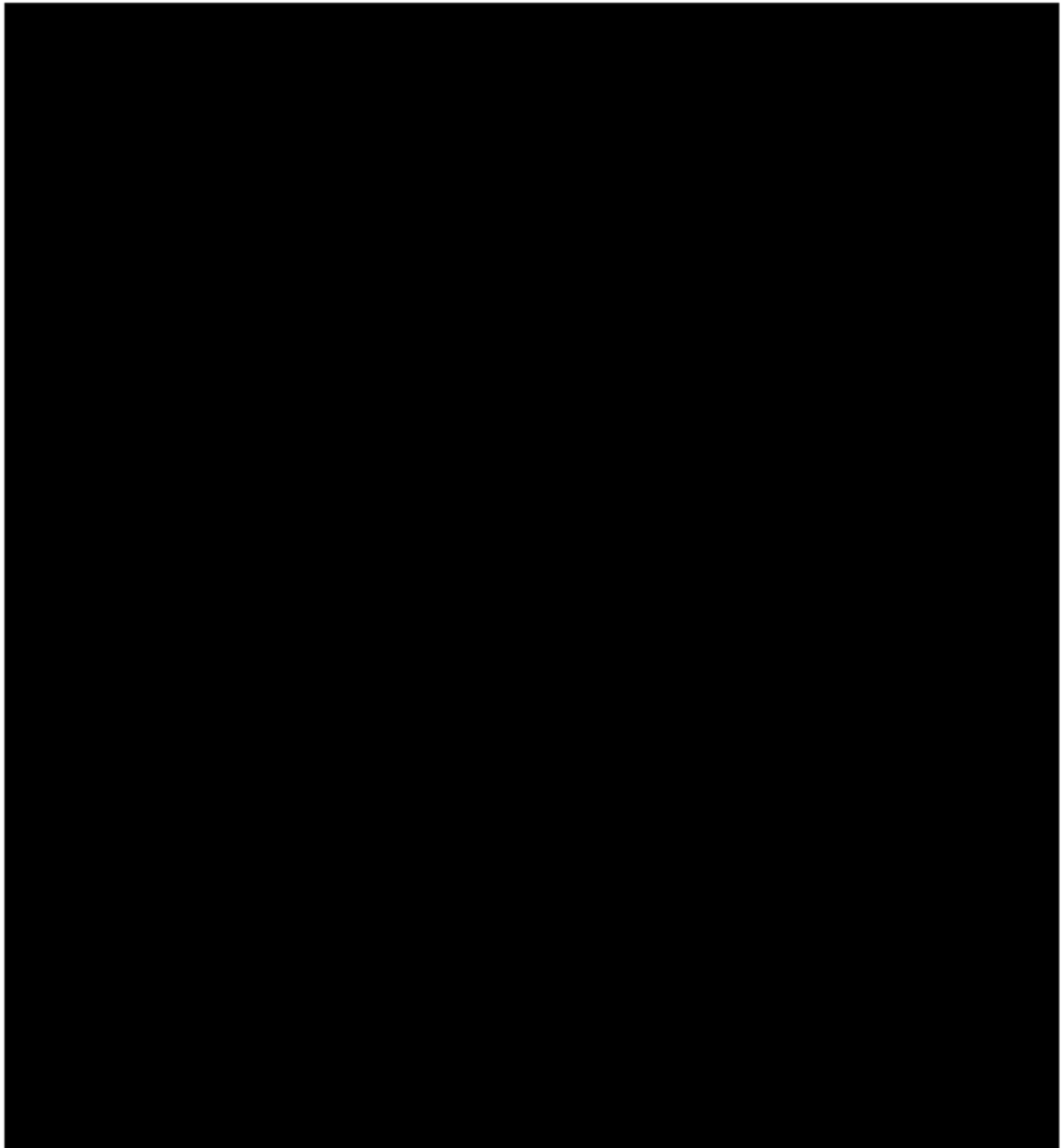
1 Q. Please take out Exhibits 1, 2 and 3 again.  
2 Does that sentence refer to any of the bags shown in  
3 these exhibits?

4 A. The Trinity bags.

5 Q. In which exhibit?

6 A. Exhibit 1.





Q. So when did you finally select a manufacturer for the Trinity bags?

A. On the second trip to Buenos Aires.

Q. Is the manufacturer located in Buenos Aires?

A. He is.

Q. Is it a single person or a company?

1 A. It is a corporation.

2 Q. What is the name?

3 A. Los Robles.

4

5

6

7

8 Q. Which individuals at the manufacturer do you  
9 deal with?

10 A. The president's son.

11 Q. What is his name?

12 A. Lionel.

13

14

15

16

17

18

19

20

21

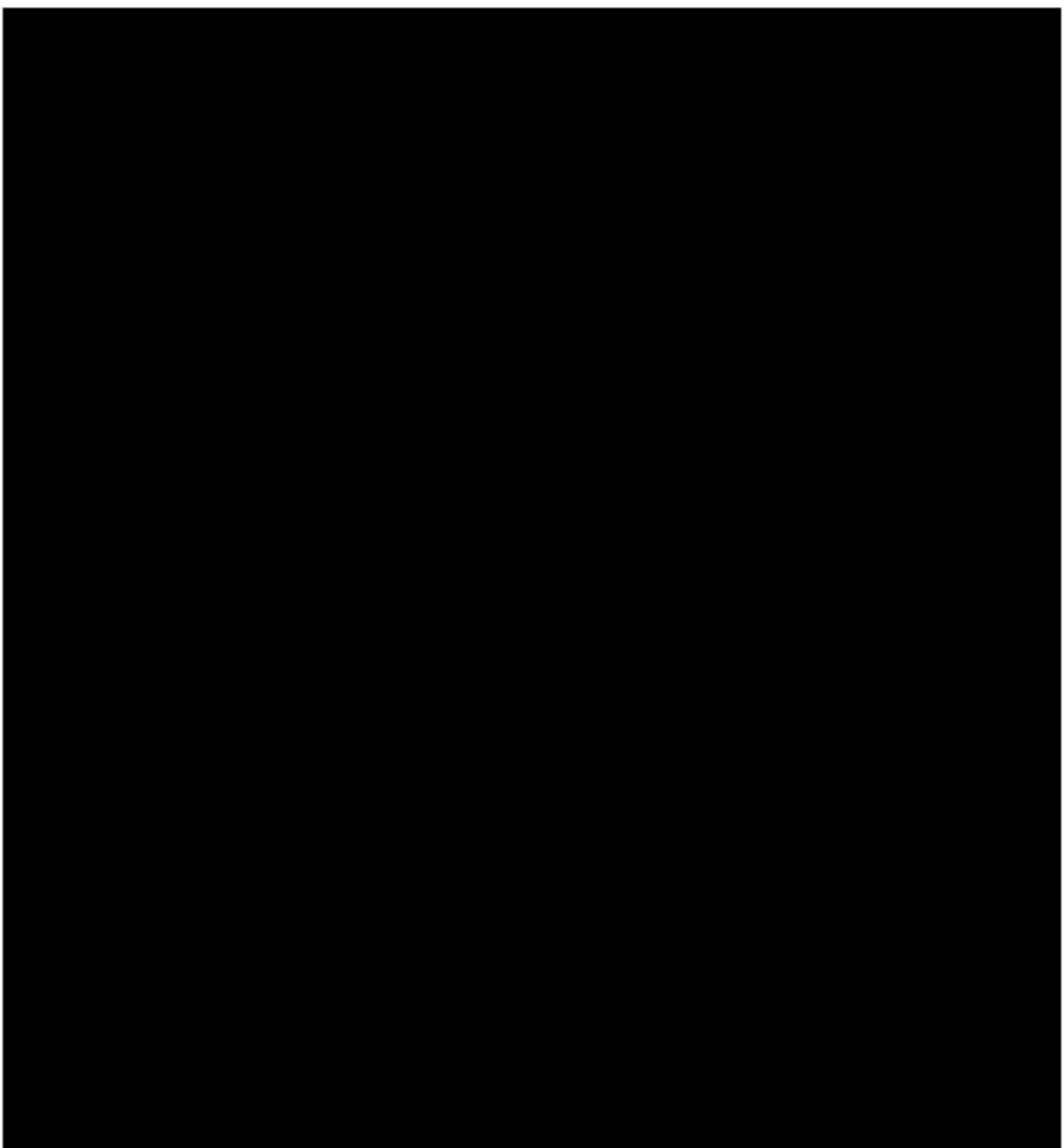
22

23

24

25

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25



Q. (By Ms. Weiss) I am showing you what has been marked as Cartier Exhibit 7. Have you seen this document before?

A. Yes, those are some of my notes.

Q. So these notes were taken by you?

A. By me.

1 Q. Approximately when did you take them?

2 A. When I was in Buenos Aires the second time.

3 Q. So in that September 2012 trip?

4 A. Yes.

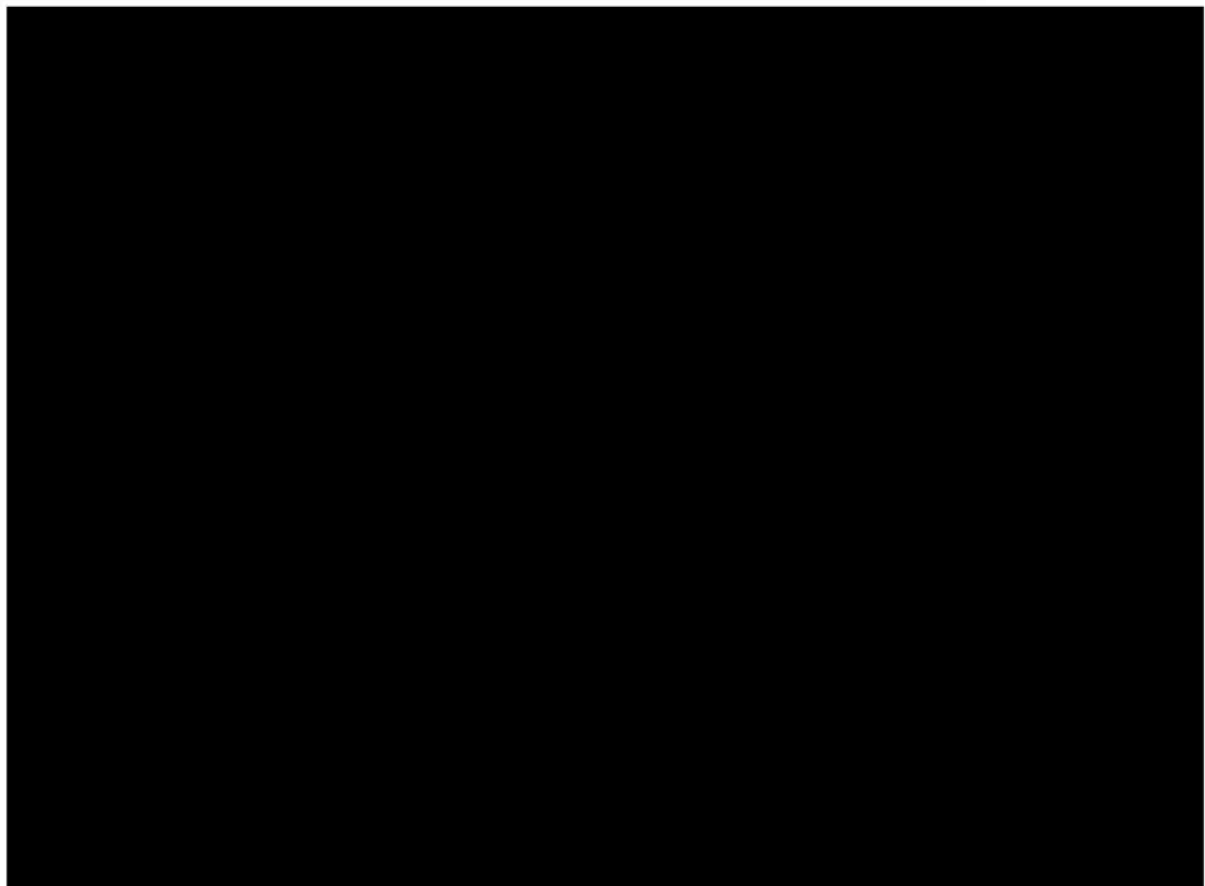
5 Q. At the top it says Production Cost or Fixed  
6 Prices. What does that mean?

7 A. He was giving me different prices for the  
8 products that I wanted. It was a price for a basic  
9 bag, it was a price for G model and there were two  
10 other potential products which I was thinking might be  
11 additional lines and he was telling me what it would  
12 cost me to have them made per item.

13 Q. Who is he?

14 A. Lionel.

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14 Q. Let's look at the last line in this exhibit.  
15 Do you see where it says Necklace?

16 A. Yes.

17 Q. What is the necklace referenced in that line?

18 A. It is a local semi-religious thing that a lot  
19 of people wear down there, but I didn't order any.

20 Q. Could you describe what it looks like?

21 A. Well, the native people have a little symbol  
22 which I don't know if it is more -- I don't know what  
23 its origins are. And it is something that has some  
24 religious meaning. But the people normally, a lot of  
25 people wear it sort of like a traditional -- I can't

1 really describe it but it is something that the people  
2 wear down there and I thought it was catchy and I like  
3 native American things and things that are just from  
4 that style. But I didn't order any.

5 Q. Is it also made of leather?

6 A. No.

7 Q. So is this quote from Los Robles as well?

8 A. It is not.

9 Q. A different manufacturer?

10 A. Well, they carried it but they didn't make it.

11 Q. So you would have ordered it from Los Robles  
12 but someone else would have made it?

13 A. I think that's how it would have worked. I  
14 didn't get any farther than saying I liked it and I  
15 will get back to them. But it was on a leather band so  
16 I guess technically it is leather.

17 Q. Did you ever get back to him?

18 A. No. I never got any further with that.

19 Q. Do you intend to make any necklaces in the  
20 future?

21 A. No.

22 Q. Why not?

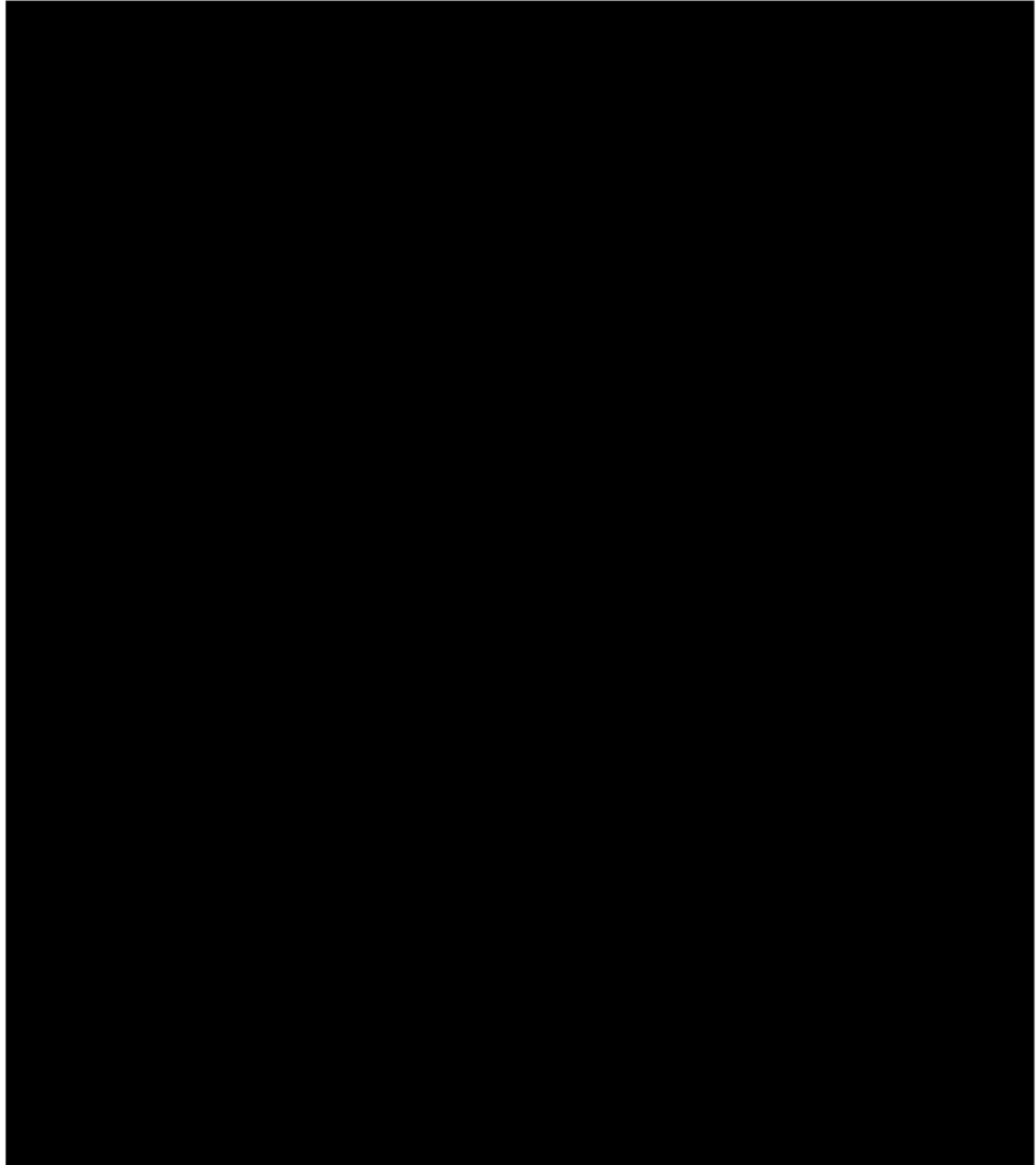
23 A. I think that if I can do well with the bags,  
24 that will be as much as I could hope for. I don't have  
25 any interest in being in jewelry. I thought that was



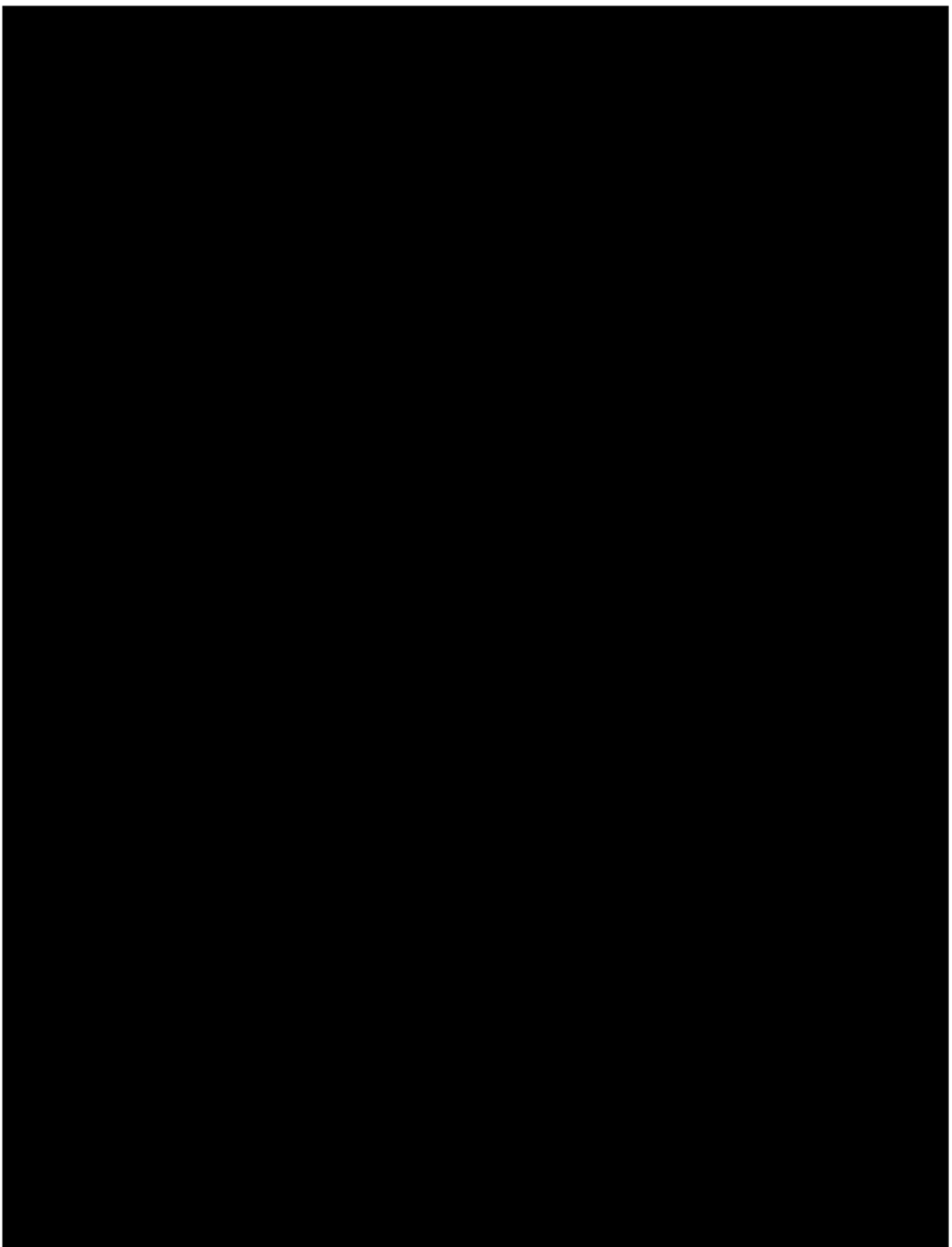
1     catchy but it is maybe -- I want to stay with leather  
2     goods.

3             Q.    Would you consider leather necklaces?

4             A.    No.   I will stay with handbags, that's what I  
5     want to do.



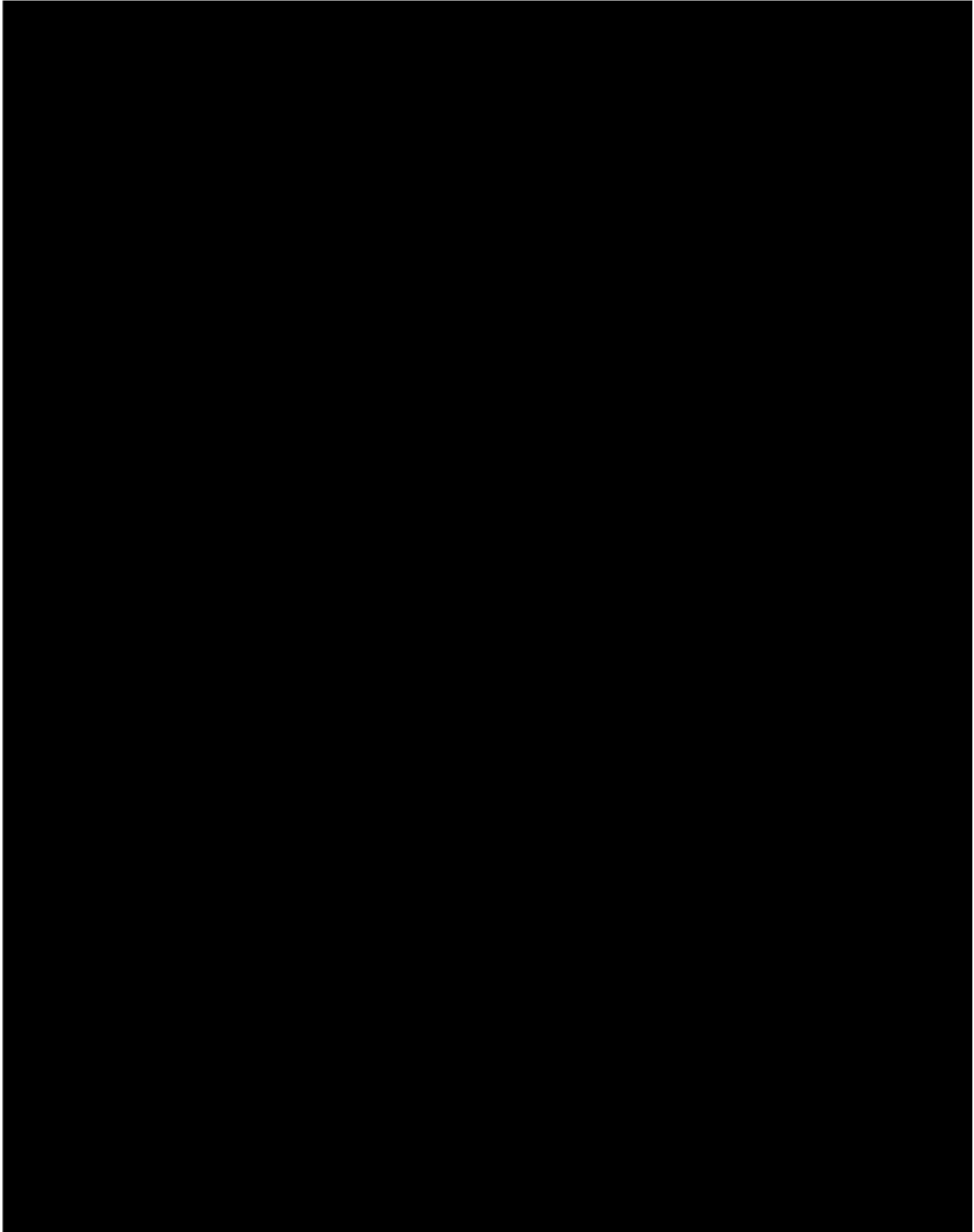
1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23



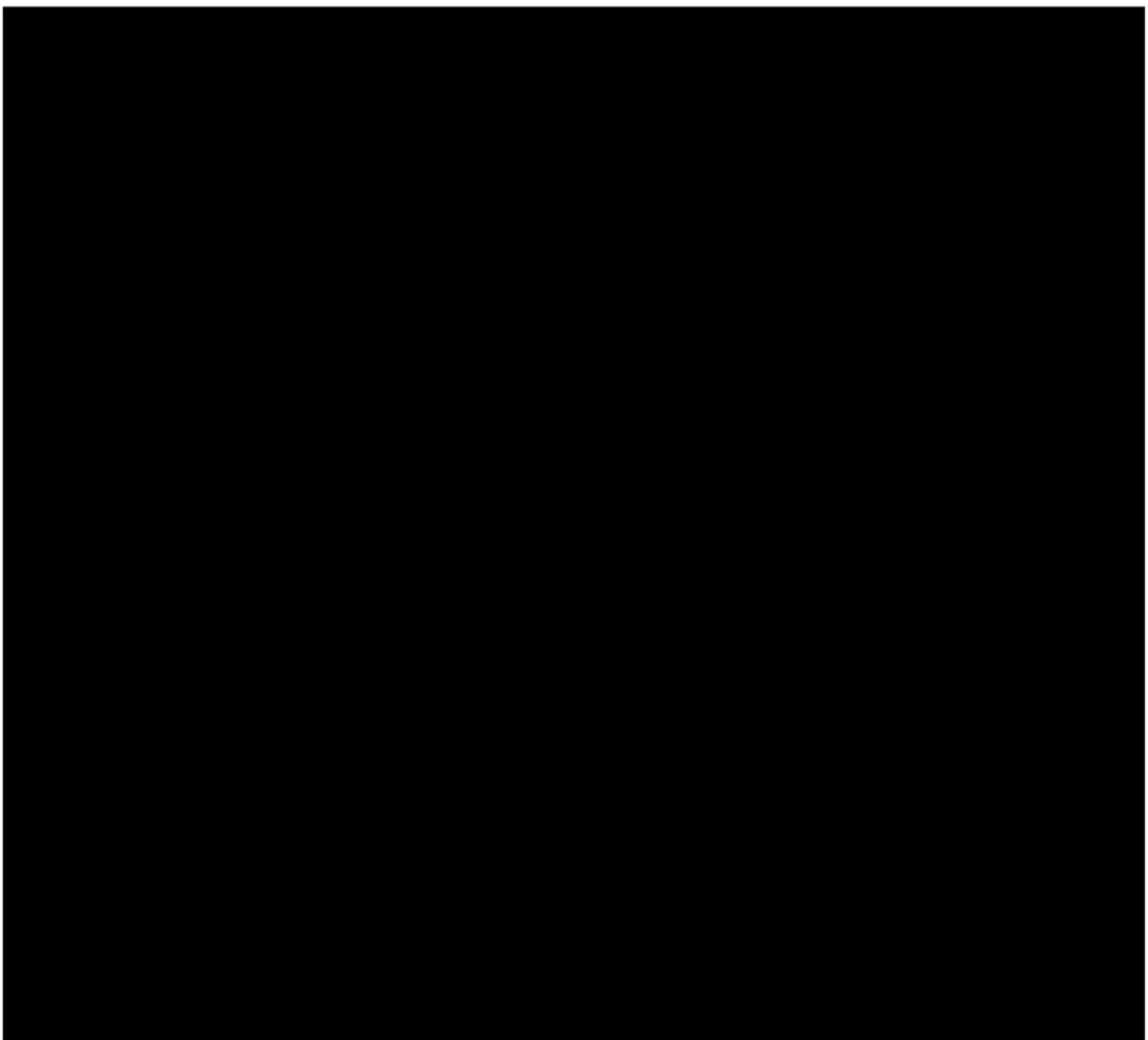
24 Q. (By Ms. Weiss) I am showing you what has been  
25 marked as Cartier Exhibit 11. Have you seen this

1 document before?

2 A. It is one of the receipts that I had when I  
3 was in Argentina.

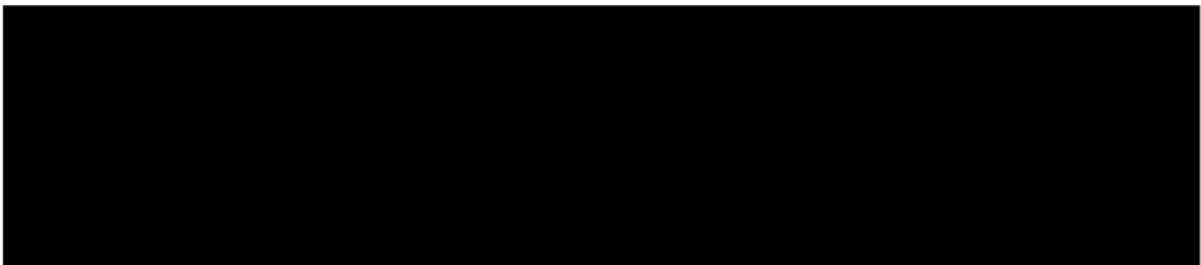


1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25



Q. Now let's move to the second page of Exhibit  
11. What is this document?

A. This is something I bought from Los Robles.  
It was a single item. I can't tell you what it was but  
I bought a few single items.



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Q. Do you remember if the single items you bought were bags?

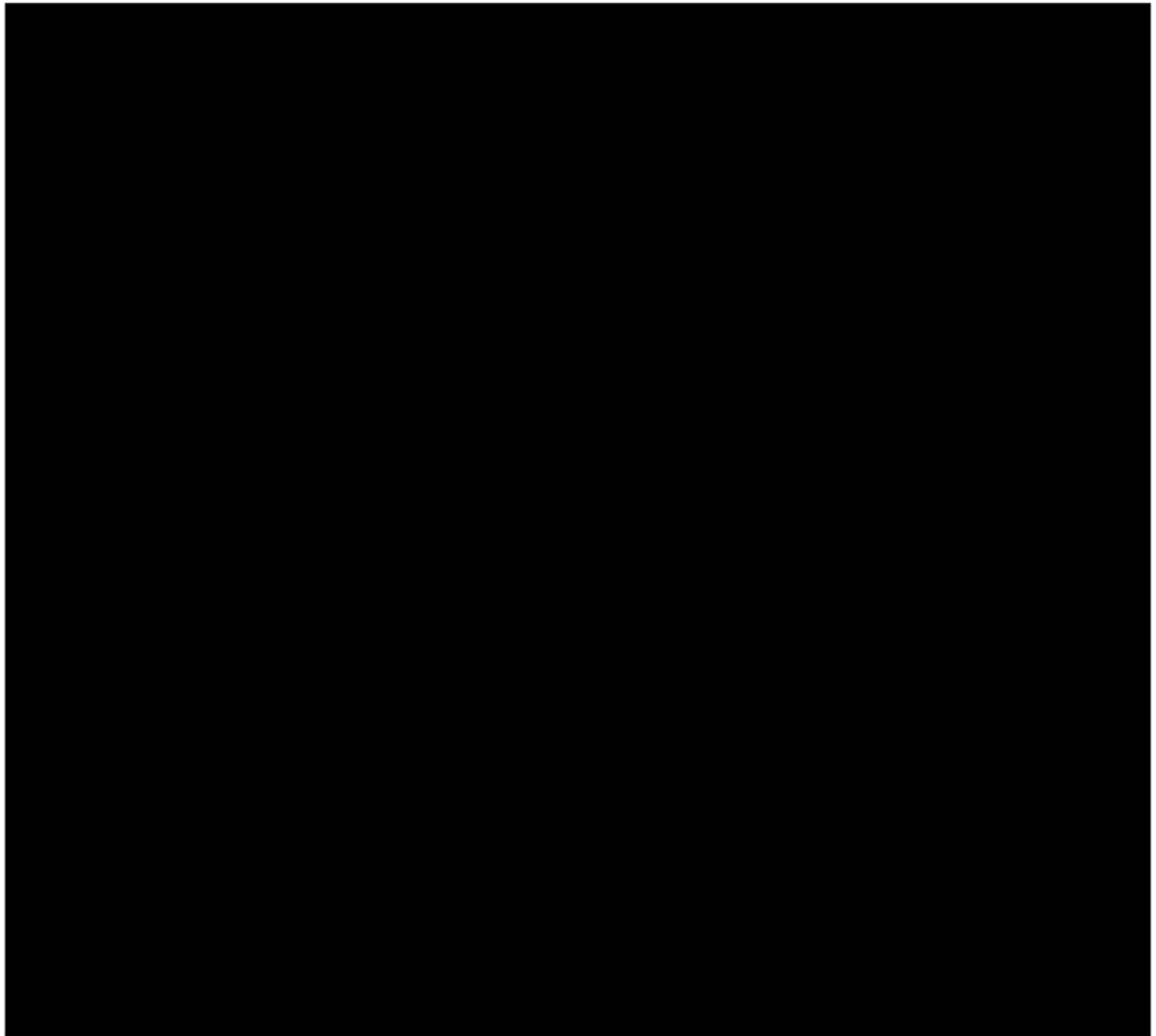
A. Some of them were. Some of them, I bought belts. I bought leather things that I thought would be logical possible extensions, but they weren't all bags. I bought a couple of belts.

Q. Do you have any intention to sell belts in the future?

A. Not at this time.

Q. Did you consider it at any point?

A. I wanted to see what people thought about the stuff when I brought them back. I bought one or two single items to see if there was any buzz about it.



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17 Q. (By Ms. Weiss) Please take a look at Exhibit 4  
18 again. That was your answers to Opposer's  
19 interrogatories. Please look at your response to  
20 Interrogatory No. 12 which appears on Page 8. Are you  
21 there?

22 A. Yes.

23 Q. Do you see the sentence in that response that  
24 reads: "Applicant has sold 156 leather handbags  
25 bearing the Trinity mark since the date of first use in

1 or around March 2011."

2 A. I see it.

3 Q. Now please turn to Page 4 of the same exhibit.  
4 Look at your response to Interrogatory No. 4 and  
5 specifically the second paragraph. Do you see the  
6 sentence that reads: "Applicant's earliest use of the  
7 Trinity mark was in or around March 2011. Applicant  
8 gifted a Trinity leather handbag to Ms. Onuzo, the wife  
9 of Pastor Chika Onuzo, of Resurrection House for All  
10 Nations in Union City, Georgia." Do you see that?

11 A. I see it.

12 Q. Does the 156 figure in your response to  
13 Interrogatory No. 12 include this gift to Ms. Onuzo?

14 A. No.

15 Q. How do you know Ms. Onuzo?

16 A. She's my pastor's wife.

17 Q. So you attend the Resurrection House for All  
18 Nations church?

19 A. I do. It was a gift out of respect for her.

20 Q. And you gave her this gift in or around March  
21 2011?

22 A. Yes.

23 Q. Which style of bag did you give her?

24 A. This one, she has a black one.

25 Q. And you mean the black bag shown in Exhibit 1?

1 A. Yes.

2 Q. And you mentioned earlier that you ordered  
3 about 250 of these bags in or around September 2012.

4 A. I don't think it was 2012, obviously, it must  
5 have been 2011. I don't remember the exact date, or  
6 which date when I gave her the bag, but it would have  
7 been 2011 or '12. She got one of the earlier bags.

8 Q. Was one of the bags she received one of the  
9 bags that you ordered from Los Robles in that order of  
10 250 bags?

11 A. Yes.

12 Q. So do you remember that you gave her that bag  
13 in or around March 2011?

14 A. I did.

15 Q. So would that trip to Argentina when you  
16 ordered the bags --

17 A. I had a few samples when I came back.

18 Q. When you came back from where?

19 A. From the first trip.

20 Q. So do you think you gave her a sample?

21 A. I don't remember the date, it would have been  
22 2011 or '12, but I don't remember the exact date I gave  
23 her the bag.

24 Q. But do you remember if you gave --

25 A. It probably was 2012 that she was given a bag.



1 Q. Okay.

2 A. I don't write that down. I don't notate that.  
3 I don't have any mechanism to keep up with the exact  
4 date.

5 Q. Do you know if it was March 2012 or some other  
6 month?

7 A. I suspect it might have been March. I don't  
8 write it down. It was a gift.

9 Q. Do you remember if she was given one of your  
10 sample bags or one of the bags from the order of 250 --

11 A. There is no difference between them.

12 Q. Just let me finish the question.

13 A. Okay.

14 Q. One of the sample bags or one of the bags from  
15 the order of 250 bags?

16 A. I don't remember because they all look just  
17 alike.

18 Q. How many samples did you get?

19 A. I might have had eight or nine samples. I had  
20 a few, a small number of samples.

21 Q. And you got those on your first trip to  
22 Argentina that we discussed earlier which --

23 A. Actually, I probably got them on the second  
24 trip.

25 Q. On the second trip. So the same time when you

1 placed the order --

2 A. Yes.

3 Q. -- you also got eight or nine samples?

4 A. Yes.

5 MR. HILL: Just let her finish. Even though  
6 she stops, she pauses, she is not done with the  
7 question.

8 THE WITNESS: Okay.

9 MR. HILL: So take a breath and let her finish  
10 the question, because otherwise her question --  
11 your answer is going to get intermingled between  
12 her question and it is not going to be a clear  
13 record what you are answering to. Although you  
14 are anticipating what she is going to say, give  
15 her a chance to say it.

16 THE WITNESS: Okay.

17 MS. WEISS: Thanks.

18 Q. (By Ms. Weiss) Just to repeat, you think that  
19 this gift was given in 2012?

20 A. I do.

21 Q. Going back to that 156 figure that we looked  
22 at in your response to Interrogatory No. 12, does that  
23 include any gifts?

24 A. No.

25 Q. No.

1           A. I consider gifts, gifts. And I consider  
2 sales, sold.

3           Q. Did you give any bags apart from the one to  
4 Ms. Onuzo?

5           A. I have given a few gifts.

6           Q. Do you know about how many?

7           A. Maybe five or six.

8           Q. To whom?

9           A. They were given as samples, my wife got one,  
10 my mother-in-law has one.

11           Q. Going back to those 156 bags that you  
12 referenced in your response to Interrogatory No. 12,  
13 were they all in the style shown in Exhibit 1?

14           A. Yes.

15           Q. Now let's go back to your answer to  
16 Interrogatory No. 12 on Page 8. Have you sold any  
17 additional bags since you answered this interrogatory  
18 on March 27, 2014?

19           A. I have.

20           Q. How many?

21           A. Maybe 20.

22           Q. Those 20 bags were all sales as opposed to  
23 gifts?

24           A. Yes. There was one gift.

25           Q. Is that one gift included in the 20 bags?

1 A. Yes.

2 Q. So you sold about 19?

3 A. Yes.

4 Q. What styles were those 20 bags?

5 A. These, Exhibit 1.

6 Q. So the styles shown in Exhibit 1?

7 A. Yes.

8 Q. So you have sold about 175 Trinity bags to  
9 date?

10 A. That's probably a good estimate.

11 Q. Just so you know, I got that by adding 156 to  
12 19.

13 Have you gifted any bags since you answered  
14 the interrogatories on March 27, 2014?

15 A. One.

16 Q. The one bag that we just discussed?

17 A. (Indicating affirmatively.)

18 Q. Staying on your response to Interrogatory No.  
19 12, look at the next sentence. Do you see where it  
20 says, "Applicant received total revenue of 27,100"? Do  
21 you see that?

22 A. I do.

23 Q. Is that the amount of revenue you received for  
24 the 150 bags you referenced in the previous sentence?

25 A. Yes.

1 Q. How much additional revenue have you received  
2 since you answered Interrogatory No. 12 on March 27,  
3 2014?

4 A. 19 times 200, on average.

5 Q. So a little under \$2,000, about?

6 A. About, yes.

7 MR. HILL: I think it is \$4,000, a little  
8 under \$4,000.

9 MS. WEISS: Yes, sorry. My math.

10 Q. (By Ms. Weiss) So a little under \$4,000?

11 A. Yes.

12 Q. Let's return to your response to Interrogatory  
13 No. 4 which spans Pages 4 and 5. Please take a look at  
14 the last paragraph in that interrogatory, and you can  
15 take a moment to read it, if you need to.

16 (Witness reviewing document.)

17 A. Okay, I read it.

18 Q. Do you see where it says, "Applicant's first  
19 use in commerce of Trinity mark was the sale of one  
20 Trinity leather handbag to Patricia Whatley Langston in  
21 or around May 2011, Atlanta, Georgia"?

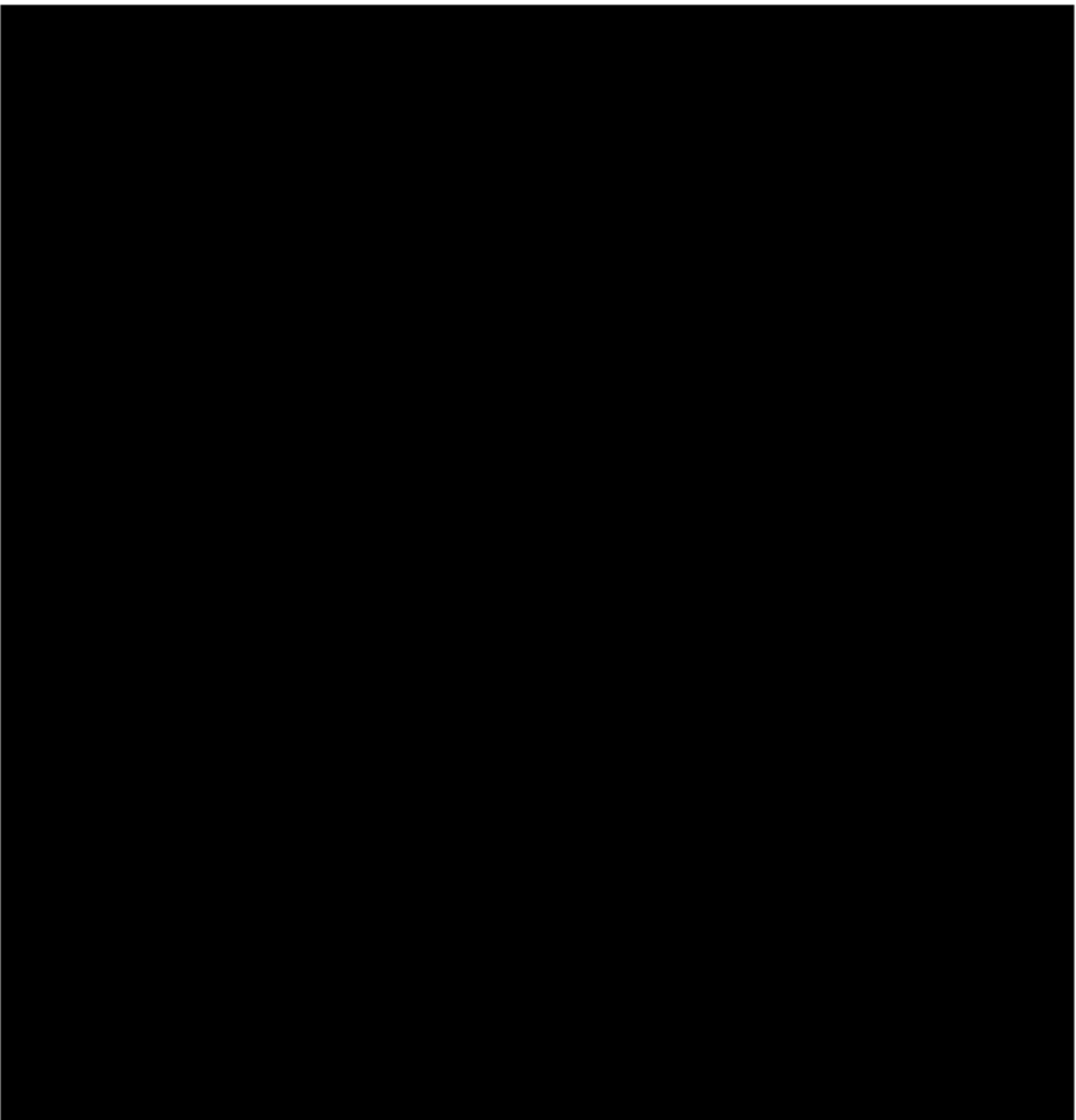
22 A. I see it.

23 Q. So was your first sale of the Trinity bag to  
24 Ms. Langston?

25 A. It was.

1 Q. In light of your earlier answer that the gift  
2 to Ms. Onuzo was in 2012, was this sale to Ms. Langston  
3 in May 2011?

4 A. Probably was '12. I don't have like a formal  
5 record, so it could have easily been '12. So about the  
6 same time Ms. Onuzo got the very first bag as a gift,  
7 the first one I sold went to Ms. Langston.





10           So after your first sale to Ms. Langston  
11           sometime in 2012, do you know how many bags you sold  
12           for the remainder of 2012?

13           A. I don't, because my strategy never was to sell  
14           individual bags. I wanted to distribute them. When I  
15           showed them to people they always want to buy a bag.  
16           But I didn't talk to anybody that would buy a thousand  
17           bags. So I didn't really track it because I never  
18           wanted to sell them one at a time.

19           Q. Were all of your sales in 2012, sales that  
20           were one at a time to individuals?

21           A. Not all of them. A couple of people did  
22           parties for me, there was a lady in Milwaukee sold  
23           maybe 20. There's a lady in Chicago who helped me sell  
24           maybe five or six. So they weren't all individual, but  
25           I did the majority that way.



1 Q. And in 2012 did you sell to any retailers?

2 A. No.

3 Q. You mentioned two parties, one in Milwaukee  
4 and one in Chicago?

5 A. Chicago.

6 Q. How did you get introduced to the people who  
7 hosted these parties?

8 A. Well, the guy in Milwaukee, him and his family  
9 are long time friends. The lady in Chicago went to  
10 college with me. She saw the bag when I was in town  
11 and I was showing it to people.

12 She had a party. Some of her friends at the  
13 bank wanted to buy them.

14 Q. How do these parties work?

15 A. She might have coffee and doughnuts, they will  
16 come over, they will look at them. If they want them,  
17 they will buy them. And if they don't, they won't.

18 Q. What is the name of your friend in Milwaukee?

19 A. Dwight McMillan. His wife is Linda McMillan.

20 Q. And what about the person you know from  
21 college in Chicago?

22 A. Her name is Linda Nolan is her name.

23 Q. Do you know approximately how much revenue you  
24 generated in 2012?

25 A. I would have to guess. The answer is I don't



1 know exactly.

2 Q. That's fine.

3 Approximately how many bags did you sell in  
4 2013?

5 A. Again I would have to guess, I would say 80 or  
6 90.

7 Q. Were those sales also to individuals?

8 A. Yes.

9 Q. Did you have any of these types of parties in  
10 2013?

11 A. I don't think I had any in '13.

12 Q. Any idea of the approximate revenue you  
13 generated in 2013?

14 A. I don't have a good number.

15 Q. Approximately how many bags have you sold in  
16 2014 to date?

17 A. Maybe 30 or 40.

18 Q. Have those all been sold to individuals?

19 A. They have.

20 Q. Do you know how much, approximately how much  
21 revenue you have generated in 2014 to date?

22 A. I don't have an exact figure.

23 Q. Please look at Exhibit 4 again, and look at  
24 Page 5. Please look at your response to Interrogatory  
25 No. 6. Do you see where it says that you have sold and

1 offered for sale the Trinity handbag in Chicago,  
2 District of Columbia, Miami and Atlanta?

3 A. I see that.

4 Q. Have you also sold and offered for sale the  
5 Trinity handbag in Milwaukee?

6 A. I have.

7 Q. Have you sold the Trinity bags in any  
8 additional cities since you answered this interrogatory  
9 on March 27, 2014?

10 A. No.

11 Q. Have the Trinity bags been sold in any retail  
12 outlets or offered for sale other than the ways you  
13 just described, meaning sales to individuals?

14 A. I gave some to one retailer in Buckhead on  
15 consignment, and the problem was it was a high-end  
16 older-type place and they didn't really sell because  
17 the people who bought, they really were older type  
18 ladies and this is more to younger-type women.

19 But L-A-L-O on Andrew Street in Buckhead, the  
20 guy liked them himself because he buys in Italy, he  
21 liked the quality of the leather. But he did say that  
22 his customers were old conservative women and they  
23 probably wouldn't buy it. But he wanted -- he liked  
24 the bag so he put it in there for about a month or two.

25 Q. You might have said it. What is the name of

1 this store?

2 A. Lalo Fine Italian Handbags, it is on Andrews  
3 Street in Buckhead which is like the wealthy shopping  
4 district here.

5 Q. You said they were put on consignment. What  
6 do you mean by that?

7 A. That if he sells them, he will keep a part and  
8 he will give me, I don't know, a part of revenue.

9 Q. So when you gave them to him initially did he  
10 give you any money?

11 A. No, no, no.

12 Q. Did he end up selling any?

13 A. No, he didn't sell them. He told me he didn't  
14 think they would, but he liked them and he would see  
15 because he thought his customers were too old for them.

16 Q. Did he keep the bags?

17 A. He had the bags, he gave them back to me  
18 after, I think we had a 45-day trial period.

19 Q. So after 45 days --

20 A. I got them back.

21 Q. -- he gave them back to you.

22 Do you know if this Lalo Fine Italian Handbags  
23 sells jewelry?

24 A. No, they do not.

25 Q. How many stores does it have?

1 A. I think three.

2 Q. All in Atlanta?

3 A. No.

4 Q. Where are the other ones located?

5 A. West Palm and I think New York.

6 Q. What else does it sell besides --

7 A. Leather handbags, nothing more, nothing less,  
8 mostly all Italian handbags.

9 Q. Do you know if it sells Cartier products?

10 A. I have no idea. They sell no jewelry. If  
11 they do sell Cartier, they don't sell no jewelry;  
12 nothing but handbags.

13 Q. How did you get introduced to the man who runs  
14 the store?

15 A. I drove over there, knocked on the door,  
16 talked to him, showed him the bags.

17 Q. Were your bags only in the Atlanta location of  
18 the store?

19 A. Yes.

20 Q. Approximately when was that 45-day period?

21 A. Probably 2013.

22 Q. How much do the Trinity bags sell for?

23 A. Well, 299 is my target price.

24 Q. When you have made sales to individuals, is  
25 that what you charged?

1 A. The people at my church, I charge them \$200.

2 Q. What about for other people?

3 A. 299.

4 Q. How much was Lalo Fine Italian Handbags going  
5 to charge?

6 A. I think 499.

7 Q. What percentage of that were you going to  
8 receive?

9 A. I think 40 percent of it.

10 Q. Have the prices that you just told me for the  
11 Trinity handbags changed since you started selling them  
12 or have they remained the same?

13 A. They are basically the same. I thought of  
14 them, you know, as mid-range bags. The quality is  
15 exquisite but they don't have a traditional name, and a  
16 brand. There is a branding issue with handbags.

17 Q. Do you intend to change the price going  
18 forward?

19 A. It depends; if I get a distribution deal and  
20 it catches on, obviously I would. But I don't have any  
21 plans to change it at this point.

22 Q. Have you thought about if you do get a  
23 distribution deal, what you will recommend the  
24 retailers charge?

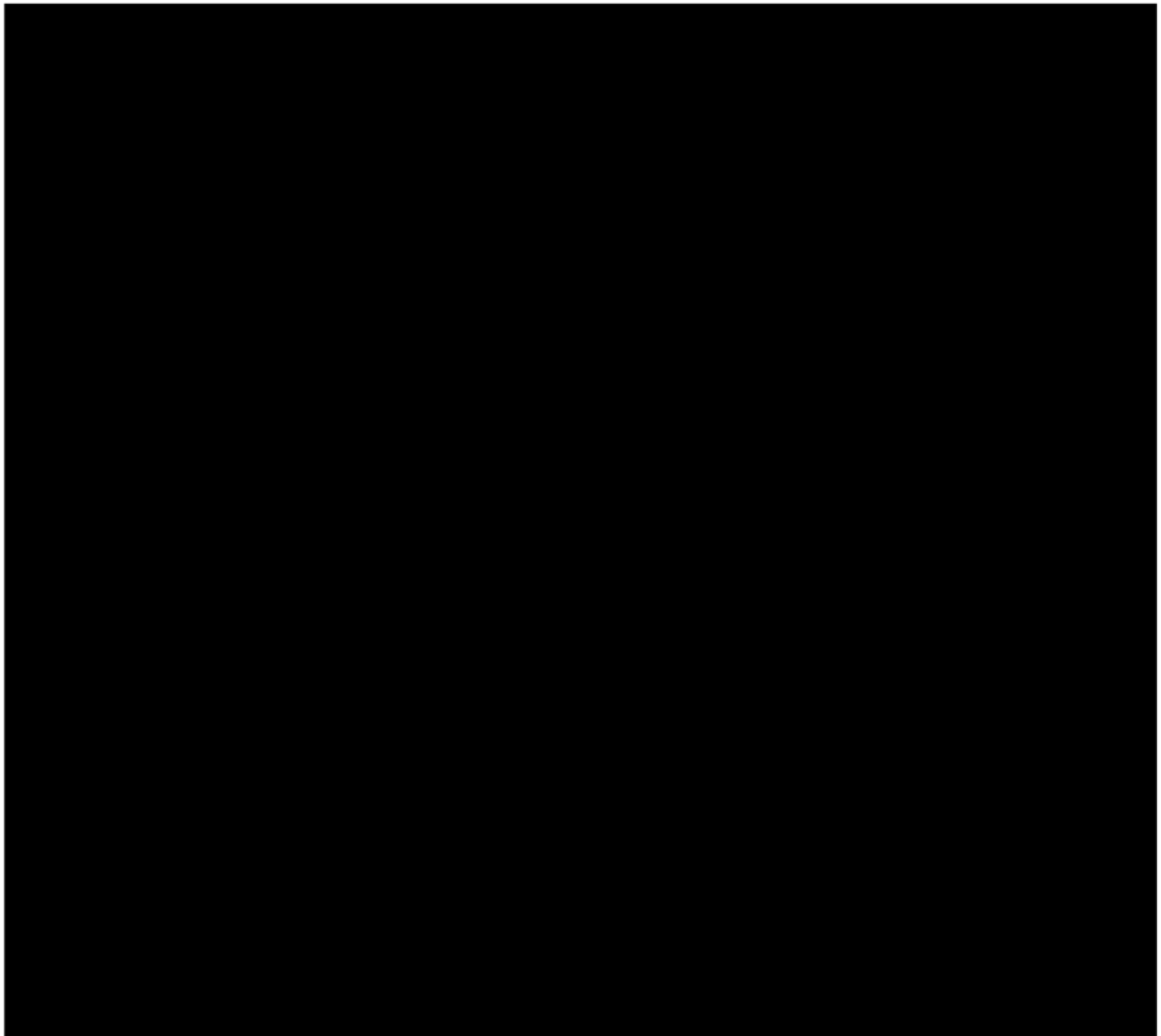
25 A. Yes, probably 499.

1 Q. Do you know what you will sell the bag to  
2 retailers for, the wholesale price?

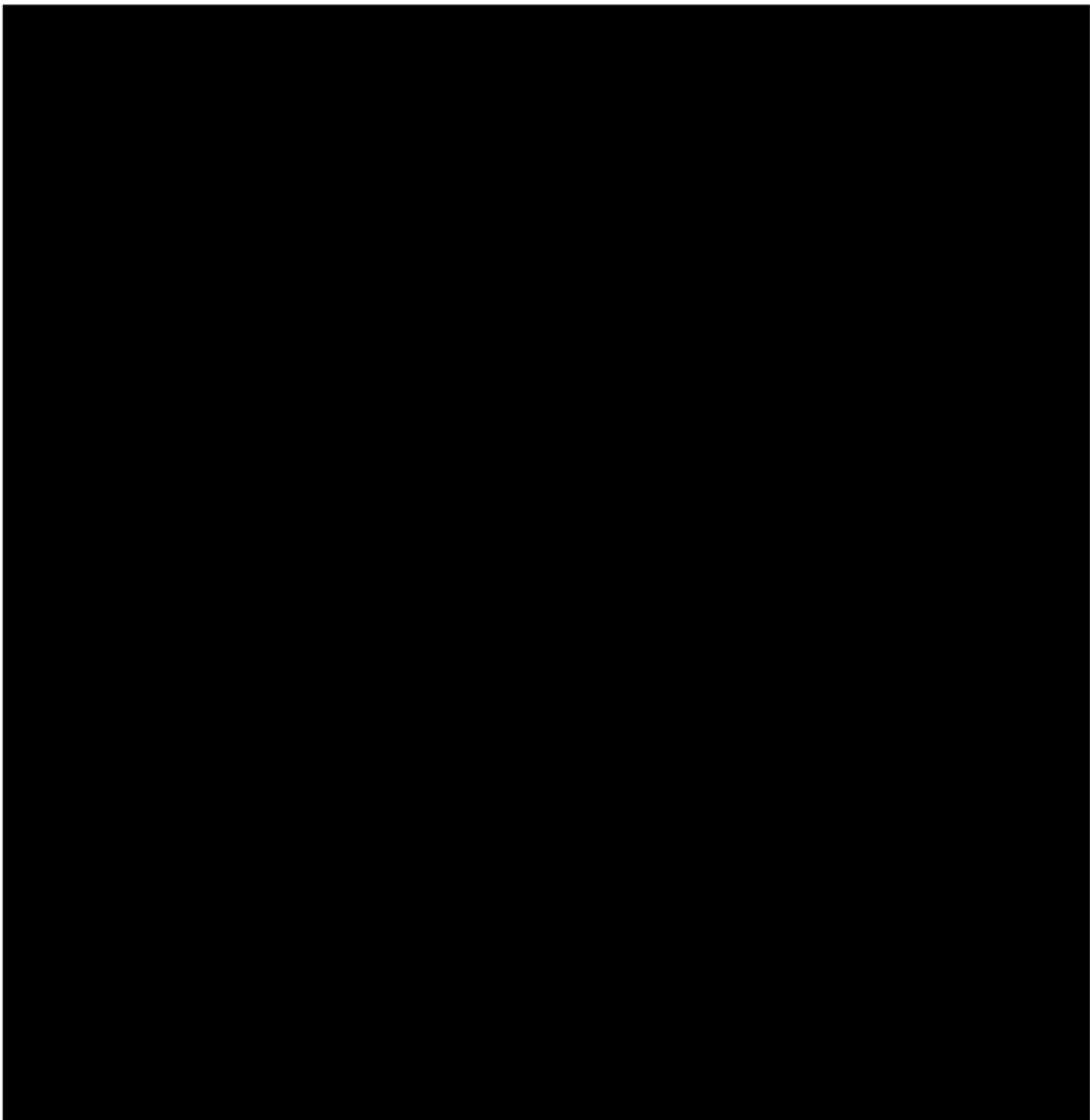
3 A. Probably 299.

4 Q. Who are the typical customers who have bought  
5 the Trinity bags?

6 A. They were professional people, primarily they  
7 were obviously women, they were probably early,  
8 middle-age type people, 25 to 45 is probably the people  
9 that bought them. Most of them were college graduates.



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25



Q. Have you tried to get into any retailers in Atlanta besides the Lalo boutique?

A. I have been to Saks 5th -- yes, I have been to other retailers.

Q. Which ones?

A. I went to Saks, I went to Phipps Plaza to several of the boutiques, I went to Neiman Marcus. And



1 most every place I went they liked the bag, but the  
2 people who, the buyers are not local and they can't  
3 carry anything that corporate doesn't get a permission  
4 to get. And it has to be bought through corporate,  
5 which in most cases none of them were here.

6 Q. You said Phipps Plaza boutiques?

7 A. Yes, that is a high-end mall in Atlanta which  
8 very expensive shops are there.

9 Q. Are the shops chains or are they local to  
10 Atlanta?

11 A. Both.

12 Q. Could you tell me which stores you visited  
13 there?

14 A. Neiman's and Saks, and I don't know the names  
15 of some of the other tony ones. But I just put them in  
16 a bag and I went different places to show them.

17 Q. Have you tried to have your bags sold in any  
18 other retailers that we haven't yet discussed?

19 A. No.

20 Q. What are your plans going forward for having  
21 your bags sold in retail channels?

22 A. Once this is resolved I plan to go to QVC, I  
23 plan to go to Fashion Week in New York and I also have  
24 a meeting with some people at the Apparel Mart in  
25 Atlanta.



1 Q. What is that?

2 A. That is where the retailers, primarily in the  
3 southeast, they come to buy from the Apparel Mart, so  
4 it is like a --

5 Q. A trade show?

6 A. -- a trade show. They don't sell to the  
7 public, but they sell to retailers.

8 Q. Would you set up a booth there?

9 A. No, I don't really want to carry them. I want  
10 them to be carried other places. That's not my  
11 strategy.

12 Q. So --

13 A. There is a couple of people that I am going to  
14 meet that have distribution throughout the southeast,  
15 which my strategy is for them to sell the bags in their  
16 stores. I don't have an interest in retail.

17 Q. Have you taken any steps to have the Trinity  
18 bags offered for sale through QVC or --

19 A. Not QVC, but I do have an appointment, I am  
20 working on an appointment to go down to the Apparel  
21 Mart with a person who has expressed an interest.

22 Q. Is that appointment set up yet?

23 A. No, it is not. It has been rescheduled twice.  
24 So it has been set and it has been rescheduled.

25 Q. Have you taken any steps to attend Fashion

1 Week or meet with people there?

2 A. No, Fashion Week is New York and it already  
3 occurred.

4 Q. So what about the next one?

5 A. I plan to go next year.

6 Q. Have you done anything to plan or prepare for  
7 that or set up meetings with people?

8 A. I do have a couple of people I have talked to  
9 that said they would help me.

10 Q. Do you have meetings set up with those people?

11 A. No. I am kind of hosed up because Cartier is  
12 holding me up and I can't sell a bag until I get a  
13 clear title to the name. So I am basically hosed by  
14 Cartier.

15 Q. So in terms of specific retail channels, where  
16 do you intend to offer your bag?

17 A. Upper middle boutiques, primarily; not so much  
18 chain. My target market is upper scale, upper middle  
19 scale boutiques is really my target market in upper  
20 Manhattan, Georgetown, Miami Beach, LA Rodeo Drive  
21 area, Buckhead, people who have discretionary income  
22 and also have a little bit forward-thinking fashion,  
23 because a lot of people follow trends. But I want the  
24 boutiques that set trends.

25 Q. Have you taken any steps to have your bags

1 sold in those boutiques you just described?

2 A. Yes, actually I had somebody take them to  
3 Rodeo Drive. I had somebody take them to South Beach,  
4 Georgetown. Nobody's taken a bite yet, but I have sent  
5 bags and people have carried them physically to see.

6 Now, they weren't people who represent Coach  
7 so I don't know if they are not that smooth or they  
8 haven't talked to the right person, but the answer is I  
9 have started taking many steps toward that.

10 Q. In any place besides the cities we have  
11 discussed earlier which were --

12 A. No, those were --

13 Q. -- DC --

14 A. Those are my target --

15 Q. -- DC, Miami, Atlanta and then you just  
16 mentioned LA; any other cities?

17 A. Paris and Milan. Paris, France; Milan, Italy.

18 Q. What have you done in those cities?

19 A. I sent a bag to a lady in Paris who worked for  
20 Coca-Cola, a friend at Coke introduced me to her  
21 husband in the fashion business. I don't know what is  
22 going to happen but I sent a bag to Paris and I sent  
23 one to Milan.

24 Q. Who did you send it to in Milan?

25 A. A guy that I got a big job with Whirlpool

1 works in Milan and he was going to talk to some of his  
2 coworkers who have family members in fashion.

3 Q. Do you know if these individuals in Paris and  
4 Milan have taken any steps yet?

5 A. I don't know, because I haven't gotten any  
6 orders from them yet.

7 Q. But you don't know in general if they visited  
8 stores?

9 A. I only know what they said and they said that  
10 they talked to some people but haven't gotten any  
11 traction yet.

12 Q. Do you know which stores they visited?

13 A. I wouldn't have known so I didn't ask them.

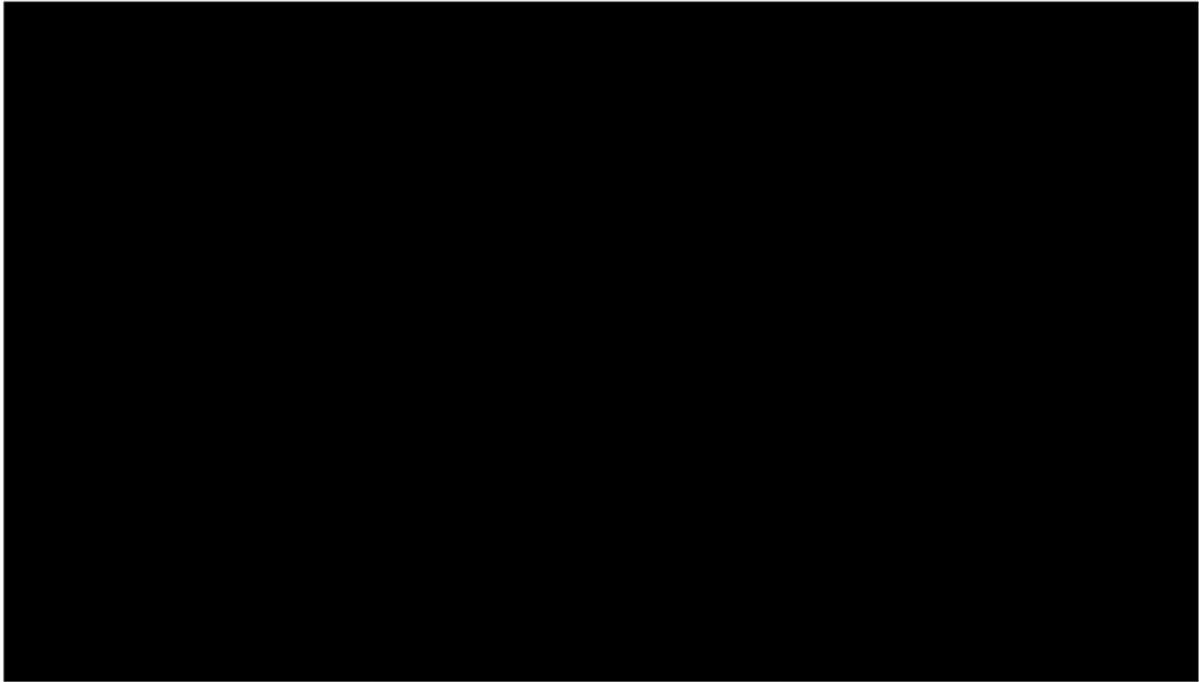
14 Q. What forms of advertising and marketing have  
15 you done to promote the Trinity bags?

16 A. I got a Coming Soon web page. We have Twitter  
17 with -- there is a movie star called Exhibiting the Bag  
18 on Twitter. Her name is Cynthia Bailey. She is one of  
19 the Housewives of Atlanta which is a very popular show.

20 I gave her a bag as a gift and I asked her if  
21 she liked it, would she take pictures. She took  
22 pictures, she put it on her Twitter page and she  
23 allowed me to put it on mine, which I haven't done very  
24 much with, but it is out there in public domain.

25 She has the bag on her Twitter page,

1 exhibiting it, saying that she likes it a lot. And she  
2 said that, you know -- I asked if she could wear it in  
3 the next episodes coming up, but I don't know if that  
4 is going to happen or not.



15 Q. (By Ms. Weiss) I am showing you what has been  
16 marked as Cartier Exhibit 13. Have you seen these  
17 documents before?

18 A. I think so.

19 Q. Can you identify them?

20 A. This is Cynthia Bailey holding up a Trinity  
21 bag.

22 Q. Take a moment to look through all of the  
23 pages.

24 A. Okay.

25 (Witness reviewing document.)

1 MR. HILL: Ms. Weiss, just for the record,  
2 this Exhibit 13 which has Bates numbers Applicant  
3 0060 running consecutively through Applicant 0095  
4 are printouts of a Twitter website that were  
5 generated by a paralegal in my office.

6 MS. WEISS: Okay.

7 A. Okay.

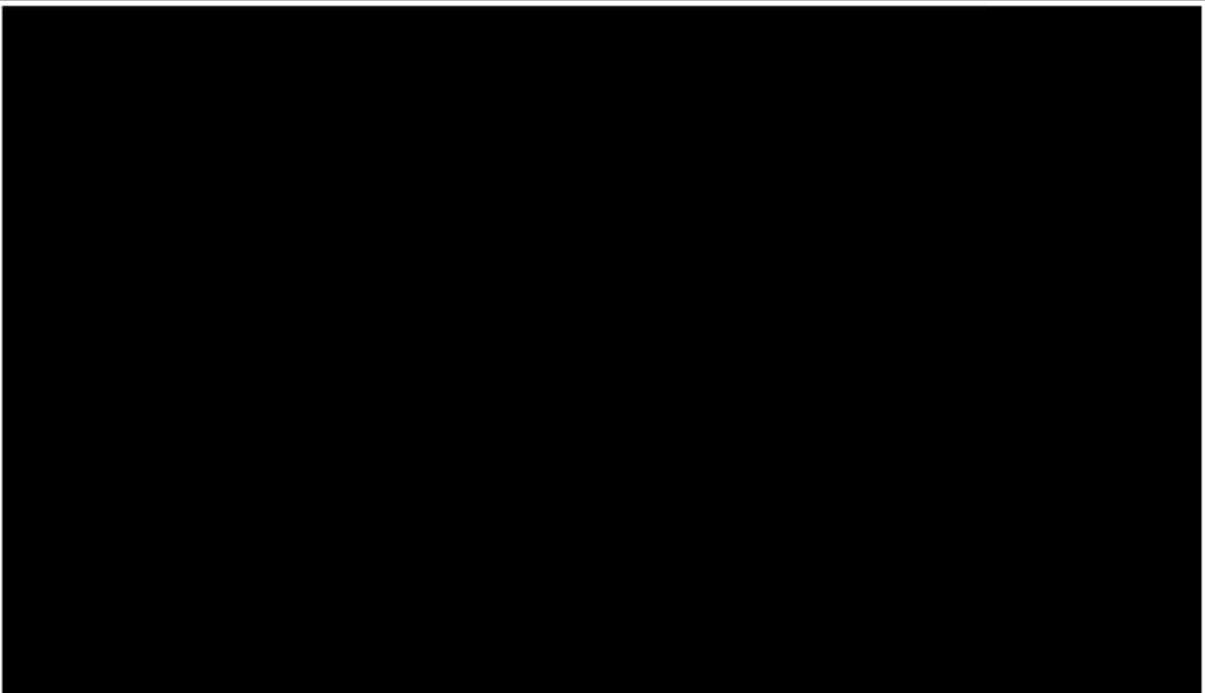
8 Q. (By Ms. Weiss) Can you identify these  
9 documents?

10 A. Right. This is Cynthia Bailey, she is one of  
11 the world famous fashion models. She is also a movie  
12 and television star with a popular showed called  
13 Housewives of Atlanta.

14 I sent her a bag as a gift and I said to her  
15 in the letter and in conversation if she likes it,  
16 would she be willing to take pictures with the bag.  
17 She came back and said she liked it and was willing to  
18 take and exhibit pictures with the bag.







1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11 Q. You state in that response that you have spent  
12 approximately \$6,000 on advertising and promotion of  
13 goods --

14 A. Yes.

15 Q. -- bearing the Trinity mark.

16 A. Yes.

17 Q. What was that money spent on?

18 A. Some of it was samples, some of it was a  
19 couple of giveaways, a couple of events that friends  
20 put on where I gave them bags to be gifts to the  
21 winners, a couple of different like raffles.  
22 Promotional free giveaway bags is what most of it was.

23 Q. Anything else that that \$6,000 was spent on?

24 A. Some basic food and entertainment, I had a few  
25 people that I'd take to lunch.

**CONFIDENTIAL**

**(FILED UNDER SEAL)**



**CONFIDENTIAL**

**(FILED UNDER SEAL)**

**CONFIDENTIAL**

**(FILED UNDER SEAL)**

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

CARTIER INTERNATIONAL A.G.,

Opposer,

v.

LANCE COACHMAN,

Applicant.

Opposition No. 91209815

App. Serial No. 85/6040000

Mark: TRINITY

**APPLICANT'S RESPONSE TO OPPOSER'S  
FIRST SET OF INTERROGATORIES**

**GENERAL OBJECTIONS**

Applicant asserts the following General Objections whether or not separately set forth in response to each of the Interrogatories:

1. Applicant objects to the definition of "you," "your" and "Applicant" and all other Definitions, Instructions, Interrogatories to the extent each seeks information not reasonably available to, or not within Applicant's possession, custody, or control.
2. Applicant objects to each Interrogatory to the extent it calls for a legal conclusion.
3. Applicant objects to each Interrogatory to the extent it seeks information that is protected by the attorney-client privilege, the work product doctrine, joint defense or common interest privilege, or any other applicable privilege, doctrine, immunity, or rule. Any inadvertent production of such information shall not be construed as a waiver of any privilege.
4. Applicant objects to each Interrogatory to the extent it seeks information beyond the scope of disclosure provided for by the Federal Rules of Civil Procedure and the Trademark

|                        |
|------------------------|
| Exhibit                |
| Exhibit No.: 41        |
| Name: Cartier          |
| Date: Coachman 9/16/11 |
| ESQUIRE                |

Trial and Appeal Board's ("TTAB") rules of practice. Applicant will supplement its answers and produce documents in accordance with the Federal Rules of Civil Procedure and the TTAB's rules of practice.

5. Applicant objects to each Interrogatory to the extent it is overbroad, unduly burdensome, or seeks information that is not material, not relevant, or not reasonably calculated to lead to the discovery of admissible evidence.

6. By answering these Interrogatories, Applicant does not concede the relevancy, materiality, propriety, or admissibility of the information provided.

7. The responses to the Interrogatories set forth below are made solely for the purpose of this action. Applicant has not completed its investigation of the facts relating to this case, discovery in the action, or its preparation for trial. The responses provided here are based on the documents and things presently available to and located by Applicant and its attorneys. Applicant reserves the right to produce additional documents and things in the future, and failure to produce such documents and things at this time shall not waive Applicant's right to offer such documents and things into evidence at trial or in other proceedings.

8. The specific objections stated in the responses do not limit or restrict these General Objections, which are incorporated into each response.

### **RESPONSES TO INTERROGATORIES**

#### **INTERROGATORY NO. 1:**

Describe in detail how Applicant currently uses and intends to use Applicant's Mark in the future.

#### **RESPONSE TO INTERROGATORY NO. 1:**

Subject to and without waiving the General Objections, Applicant responds to Interrogatory No. 1 as follows: Applicant currently uses and intends to use TRINITY in

connection with leather handbags. Applicant currently produces and sells one style of leather handbags in three colors. Applicant has also designed a leather evening handbag and intends to use TRINITY in connection with this style in the future. Pursuant to Fed .R. Civ. P. 33(d), Applicant identifies its website, [www.trinitywerks.com](http://www.trinitywerks.com), and the following documents that can be reviewed to identify the information sought by this Interrogatory: Applicant 0018-20.

**INTERROGATORY NO. 2:**

Describe in detail the creation, selection and adoption of Applicant's Mark, including all reasons Applicant selected Applicant's Mark.

**RESPONSE TO INTERROGATORY NO. 2:**

Applicant objects to Interrogatory No. 2 as overbroad, unduly burdensome, and seeking information that is not material, not relevant, and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the General and Specific Objections, Applicant responds to Interrogatory No. 2 as follows: Trinity is the name of Applicant's only daughter. Applicant selected and adopted the TRINITY mark for use with his products because any revenues generated from the sale of his products are to be set aside for his daughter's college fund.

**INTERROGATORY NO. 3:**

Identify all goods Applicant currently offers or intends to offer in connection with Applicant's Mark.

**RESPONSE TO INTERROGATORY NO. 3:**

Subject to and without waiving the General Objections, Applicant responds to Interrogatory No. 3 as follows: Applicant currently offers and intends to offer leather handbags in connection with TRINITY. Pursuant to Fed .R. Civ. P. 33(d), Applicant identifies its website,

www.trinitywerks.com, and the following documents that can be reviewed to identify the information sought by this Interrogatory: Applicant 0018-20.

**INTERROGATORY NO. 4:**

(a) Identify the earliest date upon which Applicant used Applicant's Mark, and describe in detail the nature of such use; and

(b) For each of the goods identified in Interrogatory No.3, identify all facts concerning Applicant's first use of Applicant's Mark in commerce in connection with such good, and identify documents sufficient to show Applicant's first use of Applicant's Mark in connection with such good.

**RESPONSE TO INTERROGATORY NO. 4:**

Applicant objects to Interrogatory No. 4 as compound, and counts each discrete subpart as a separate interrogatory.

Subject to and without waiving the General and Specific Objections, Applicant responds to Interrogatory No. 4 as follows: Applicant's earliest use of the TRINITY mark was in or around March 2011. Applicant gifted a TRINITY leather handbag to Ms. Onuzo, the wife of Pastor Chika Onuzo at Resurrection House For All Nations in Union City, Georgia. The TRINITY mark is shown at two locations – on the body of the handbag and on the leather tag attached to the handbag.

Applicant's first use in commerce of the TRINITY mark was the sale of one TRINITY leather handbag to Patricia Whatley Langston in or around May 2011 in Atlanta, Georgia. Applicant is part of Glory Works, a ministry for entrepreneurs at his local church. Applicant brought his products to a Glory Works entrepreneur meeting in or around April 2011 and told other members of Glory Works about his TRINITY leather handbag. Someone who attended the

Glory Works entrepreneur meeting in or around April 2011 mentioned Applicant's product to Ms. Langston and Ms. Langston subsequently purchased one TRINITY leather handbag from Applicant.

**INTERROGATORY NO. 5:**

Describe in detail the types of consumers to whom Applicant markets and intends to market its goods under Applicant's Mark, including by identifying the demographics of such consumers.

**RESPONSE TO INTERROGATORY NO. 5:**

Subject to and without waiving the General Objections, Applicant responds to Interrogatory No. 5 as follows: Applicant markets and intends to market his TRINITY leather handbags to upscale boutiques and department stores in the U.S. and in Europe. Applicant's product is in the category of a lower-end expensive handbag, in the \$300-600 range. Applicant intends to sell the TRINITY leather handbags for \$399 at upscale boutiques and department stores. Applicant's key consumer demographic are women between the ages of 25-40, with disposable income, predominantly aimed at corporate or wealthy women. Applicant's TRINITY leather handbags are particularly attractive on athletic women, as the handle of the bag accentuates toned arms.

**INTERROGATORY NO. 6:**

Identify the geographical locations (by identifying the city and state) within the United States where Applicant is offering for sale or selling goods under Applicant's Mark.

**RESPONSE TO INTERROGATORY NO. 6:**

Subject to and without waiving the General Objections, Applicant responds to Interrogatory No. 6 as follows: Applicant sold and offers for sale the TRINITY handbag in Chicago, District of Columbia, Miami and Atlanta.

**INTERROGATORY NO. 7:**

Identify the geographical locations (by identifying the city and state) within the United States where Applicant plans to offer for sale goods under Applicant's Mark.

**RESPONSE TO INTERROGATORY NO. 7:**

Subject to and without waiving the General Objections, Applicant responds to Interrogatory No. 7 as follows: Applicant plans to offer for sale the TRINITY handbag throughout the U.S.

**INTERROGATORY NO. 8:**

Identify the type of media (*e.g.*, brochures, television commercials, radio, newspaper, magazine, Internet, point-of sale materials, etc.) and all media outlets (*e. g.*, *Time Magazine*, BBC Television, [www.cnn.com](http://www.cnn.com)) within each specific medium through which Applicant or any authorized third parties have advertised or intend to advertise and promote goods under Applicant's Mark.

**RESPONSE TO INTERROGATORY NO. 8:**

Subject to and without waiving the General Objections, Applicant responds to Interrogatory No. 8 as follows: Cynthia Bailey from the television series *The Real Housewives of Atlanta* tweeted a photograph of herself carrying Applicant's TRINITY leather handbag on May 24, 2012. Pursuant to Fed .R. Civ. P. 33(d), Applicant identifies the following documents that can be reviewed to identify the information sought by this Interrogatory: Applicant 0001-17.

**INTERROGATORY NO. 9:**

Identify all events or trade shows at which Applicant has utilized or plans to promote goods bearing Applicant's Mark.



**RESPONSE TO INTERROGATORY NO. 9:**

Subject to and without waiving the General Objections, Applicant responds to Interrogatory No. 9 as follows: Applicant has not utilized nor promoted the TRINITY leather handbags at any events nor trade shows and does not currently have any plans to promote the handbags at any events or trade shows.

**INTERROGATORY NO. 10:**

Identify each person and organization (*e.g.*, advertising agencies, marketing firms) that has participated or plans to participate in promotion of goods bearing Applicant's Mark.

**RESPONSE TO INTERROGATORY NO. 10:**

Subject to and without waiving the General Objections, Applicant responds to Interrogatory No. 10 as follows: Applicant has not engaged and currently has no plans to engage any advertising firms, marketing firms or other types of agencies to promote the TRINITY leather handbags.

**INTERROGATORY NO. 11:**

State the amount of money Applicant has spent on advertising and promotion of goods bearing Applicant's Mark since the date of first use of Applicant's Mark, on both a monthly and an annual basis.

**RESPONSE TO INTERROGATORY NO. 11:**

Subject to and without waiving the General Objections, Applicant responds to Interrogatory No. 11 as follows: Applicant has spent approximately \$6,000.00 on advertising and promotion of goods bearing the TRINITY mark since the date of first use. Pursuant to Fed .R. Civ. P. 33(d), Applicant identifies the following documents that can be reviewed to identify the information sought by this Interrogatory: Applicant 0001-17.

**INTERROGATORY NO. 12:**

State Applicant's total actual sales to date, if any, on both a monthly and an annual basis (in terms of both dollars and units sold) since the date of first use of Applicant's Mark for goods bearing Applicant's Mark.

**RESPONSE TO INTERROGATORY NO. 12:**

Subject to and without waiving the General Objections, Applicant responds to Interrogatory No. 12 as follows: Applicant has sold 156 leather handbags bearing the TRINITY mark since the date of first use in or around March 2011. Applicant received a total revenue of \$27,100. Applicant did not maintain sales records on a monthly or on an annual basis and is not able to provide such information.

**INTERROGATORY NO. 13:**

Describe how and when Applicant became aware of Opposer's Mark.

**RESPONSE TO INTERROGATORY NO. 13:**

Subject to and without waiving the General Objections, Applicant responds to Interrogatory No. 13 as follows: Applicant became aware of Opposer's Mark upon receipt of Mr. John Margiotta's letter dated January 7, 2013, stating Opposer's proposed opposition to Application Serial No. 85/604,000. Applicant had no knowledge of Opposer's Mark prior to this date.

**INTERROGATORY NO. 14:**

- (a) Identify all opinions, search reports, or other communications concerning your right to use or register Applicant's Mark or the existence of possible conflicting marks; and
- (b) Set forth all opinions concerning your right to use or register Applicant's Mark or the existence of possible conflicting marks.

**RESPONSE TO INTERROGATORY NO. 14:**

Applicant objects to Interrogatory No. 14 as compound, and counts each discrete subpart as a separate interrogatory.

Subject to and without waiving the General and Specific Objections, Applicant responds to Interrogatory No. 14(a) as follows: Applicant conducted a search of the U.S. Patent and Trade Office's database – Trademark Electronic Search System (TESS) prior to the filing of Application Serial No. 85/604,000 with the USPTO. Applicant searched for any active marks bearing the word "TRINITY" in International Class No. 18. No possible conflicting marks were found on TESS. Applicant has no other non-privileged opinions, search reports, or other communications concerning Applicant's right to use or register TRINITY or the existence of possible conflicting marks. Applicant's TRINITY mark for leather handbags in International Class 18 was approved by the U.S. Patent and Trademark Office on August 29, 2012 for publication after no confusingly similar marks were found. Pursuant to Fed .R. Civ. P. 33(d), Applicant identifies the following documents that can be reviewed to identify the information sought by this Interrogatory: Applicant 0037-59.

Applicant objects to Interrogatory No. 14(b) as it seeks information that is protected by the attorney-client privilege and work –produce doctrine.

**INTERROGATORY NO. 15:**

Identify all trademarks you are considering or have considered as alternatives to Applicant's Mark.

**RESPONSE TO INTERROGATORY NO. 15:**

Applicant objects to Interrogatory No.15 as overbroad, unduly burdensome, and seeking information that is not material, not relevant, and not reasonably calculated to lead to the

discovery of admissible evidence. Subject to and without waiving the General and Specific Objections, Applicant responds to Interrogatory No. 15 as follows: Applicant did not consider and is not presently considering any alternatives to the TRINITY mark.

**INTERROGATORY NO. 16:**

Describe each instance of which Applicant is aware in which there has been actual confusion between Applicant and Opposer, or their goods, as a result of either party's use of the marks at issue in this proceeding.

**RESPONSE TO INTERROGATORY NO. 16:**

Subject to and without waiving the General Objections, Applicant responds to Interrogatory No. 16 as follows: Applicant is not aware of any instances of actual confusion between Applicant and Opposer or their goods.

**INTERROGATORY NO. 17:**

Describe each instance of which Applicant is aware in which a third party has inquired concerning whether Applicant or Applicant's goods under Applicant's Mark is/are approved by, related to or associated with Opposer or Opposer's goods under Opposer's Mark.

**RESPONSE TO INTERROGATORY NO. 17:**

Subject to and without waiving the General Objections, Applicant responds to Interrogatory No. 17 as follows: Applicant is not aware of any instances where a third party has inquired whether Applicant or Applicant's goods under TRINITY is approved by, related to or associated with Opposer or Opposer's goods under Opposer's Mark.

**INTERROGATORY NO. 18:**

Describe all Market Research Applicant has conducted or plans to conduct concerning Opposer's Mark or Applicant's Mark, whether completed or not, and whether or not prepared in connection with this proceeding.

**RESPONSE TO INTERROGATORY NO. 18:**

Applicant objects to Interrogatory No.18 as overbroad, unduly burdensome, and seeking information that is not material, not relevant, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the General and Specific Objections, Applicant responds to Interrogatory No. 18 as follows: Applicant visited various department stores and handbag boutiques to look at the quality of the leather and craftsmanship of handbags that are offered for sale and in order to set up pricing for the TRINITY leather handbag based on comparable handbags. Specifically, Applicant talked to representatives at the Macy's department store in Atlanta to discuss possible distribution; the representatives at Macy's suggested that Applicant go meet with Macy's buyers in New York, New York.

**INTERROGATORY NO. 19:**

Identify all third parties of which you are aware that are using a name or mark that contains the term "TRINITY" in the United States in connection with any goods within International Class 18.

**RESPONSE TO INTERROGATORY NO. 19:**

Applicant objects to Interrogatory No.19 as overbroad, unduly burdensome, and seeking information that is not material, not relevant, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the General and Specific Objections, Applicant responds to Interrogatory No. 19 as follows: Applicant is not aware of any

third parties using a name or mark that contains TRINITY in the U.S. in connection with any goods within International Class 18. Applicant is aware of U.S. Trademark Registration No. 4209571 for “Trinity Ranch,” design with words, letter and/or numbers. Applicant is not aware of any other trademark registrations that contains TRINITY in the U.S. in connection with any goods within International Class 18.

**INTERROGATORY NO. 20:**

Identify the persons with most knowledge regarding the following topics:

- (a) the selection of Applicant's Mark;
- (b) Applicant's date of first use of Applicant's Mark;
- (c) How Applicant's Mark is and will be used; and
- (d) Applicant's sales and promotion of products or services offered in connection with

Applicant's Mark, or Applicant's plans therefor.

**RESPONSE TO INTERROGATORY NO. 20:**

Applicant objects to Interrogatory No. 20 as compound, and counts each discrete subpart as a separate interrogatory.

Subject to and without waiving the General and Specific Objections, Applicant responds to Interrogatory No. 20(a) as follows: Lance Coachman is the person with most knowledge regarding the selection of TRINITY.

Subject to and without waiving the General and Specific Objections, Applicant responds to Interrogatory No. 20(b) as follows: Lance Coachman is the person with most knowledge regarding Applicant's date of first use of TRINITY.

Subject to and without waiving the General and Specific Objections, Applicant responds to Interrogatory No. 20(c) as follows: Lance Coachman is the person with most knowledge regarding how TRINITY is and will be used by Applicant.

Subject to and without waiving the General and Specific Objections, Applicant responds to Interrogatory No. 20(d) as follows: Lance Coachman is the person with most knowledge regarding Applicant's sales and promotions of products or services offered in connection with TRINITY or Applicant's plans therefor.

**INTERROGATORY NO. 21:**

Identify each person who answered or provided information used in answering the preceding Interrogatories, specifying the particular Interrogatories for which each such person provided an answer or information.

**RESPONSE TO INTERROGATORY NO. 21:**

Lance Coachman is the only person who answered or provided information used in answering the preceding Interrogatories.

**INTERROGATORY NO. 22:**

Identify the person most knowledgeable in the United States about the facts stated in response to each of these Interrogatories.

**RESPONSE TO INTERROGATORY NO. 22:**

Lance Coachman is the person most knowledgeable in the U.S. about the facts stated in response to each of these Interrogatories.

**INTERROGATORY NO. 23:**

Identify any expert retained in connection with this proceeding, whether or not you intend to rely on the testimony of such expert.

**RESPONSE TO INTERROGATORY NO. 23:**

Subject to and without waiving the General Objections, Applicant responds to Interrogatory No. 23 as follows: to date, Applicant has not retained any expert in connection with this opposition.

Date: March 27, 2014

Respectfully submitted,

LANCE COACHMAN

By: / Reginald J. Hill /

Reginald J. Hill  
H. Ashley Chi  
JENNER & BLOCK LLP  
353 N. Clark Street  
Chicago, IL 60654-3456  
(312) 222-9350

*Attorneys for Applicant*

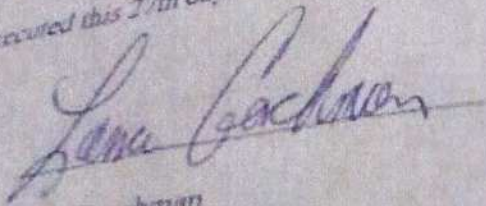


**VERIFICATION**

I, Lance Coachman, hereby declare and state that all of the facts stated in the above-cited responses have been assembled by myself and by my counsel. I verify that the matters stated therein are true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 27th day of March, 2014.

A handwritten signature in dark ink, appearing to read "Lance Coachman", written over a horizontal line.

Lance Coachman

**CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing **APPLICANT'S RESPONSE TO OPPOSER'S FIRST SET OF INTERROGATORIES** has been served upon counsel for Opposer CARTIER INTERNATIONAL A.G. on March 28, 2014, via First Class Mail, postage prepaid, and via email to:

John P. Margiotta  
FROSS ZELNICK LEHRMAN & ZISSU, P.C.  
866 United Nations Plaza  
New York, New York 10017  
(212) 813-5900  
jmargiotta@fzlz.com

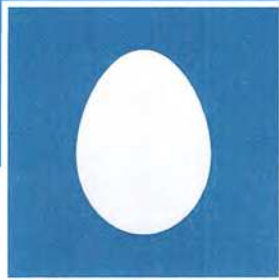
/ H. Ashley Chi /  
Reginald J. Hill  
H. Ashley Chi  
JENNER & BLOCK LLP  
353 N. Clark Street  
Chicago, IL 60654-3456  
(312) 222-9350  
Attorneys for Applicant

**CONFIDENTIAL**

**(FILED UNDER SEAL)**

**CONFIDENTIAL**

**(FILED UNDER SEAL)**



@mlcoachman

trinitywerks

TWEETS

6

PHOTOS/VIDEOS

4

FOLLOWING

2

More

Joined April 2012

Tweets

Tweets and replies

trinitywerks @mlcoachman Feb 22

"@ArsenioHall check out the next big thing in Global Fashion: stylish, sexy & ergonomic bags and other leather goods #KickAssStarter".



trinitywerks @mlcoachman 24 May 2012

Cynthia, let ur friends kno the Trinity bags r now featured @ Lalo Fine Italian Handbags, 110 E Andrews Dr in Buckhead.



View more photos and videos



trinitywerks @mlcoachman 21 Apr 2012

just got new shipment of bags

| Exhibit                       |
|-------------------------------|
| Exhibit No.:                  |
| Name: <i>Cartier 13/13</i>    |
| Date: <i>Coachman 9/16/14</i> |
| ESQUIRE                       |



 trinitywerks @mlcoachman · 21 Apr 2012

Ms. Bailey , I am happy you like the bag.

Coach



[View more photos and videos](#)

 trinitywerks @mlcoachman · 21 Apr 2012

Ms. Bailey , I am happy you like the bag.

Coach



[View more photos and videos](#)

 trinitywerks @mlcoachman · 18 Apr 2012

Cynthia Bailey of Real Housewives of Atlanta rockin' TrinityWerks gear!



[View more photos and videos](#)

Don't miss any updates  
from **trinitywerks**

Sign up for Twitter



**trinitywerks**  
mlcoachman

"@ArsenioHall check out the next big thing  
in Global Fashion: stylish, sexy & ergonomic  
bags and other leather goods  
#KickAssStarter".

Reply

Retweet

Favorite



10:01 AM - 22 Feb 2014

Don't miss any updates from **trinitywerks**

Sign up for Twitter





@ArsenioHall

**Arsenio Hall**

TWEETS 22.5K PHOTOS/VIDEOS 3,013

FOLLOWING 387

FOLLOWERS 345K

FAVORITES 9

More

Stand Up/Actor/Host If you tweet at me, read the legal stuff: [arsenio.io/1hcVgmb](http://arsenio.io/1hcVgmb)

HALLWOOD

[arseniohall.com](http://arseniohall.com)

Joined June 2010

Tweets

Tweets and replies



Arsenio Hall @ArsenioHall · 16h

Eating and singing "Fancy". My publicist @HarperPR deserves a raise! Alan Alda I'm not! [instagram.com/p/qdJ2PMwitA/](https://www.instagram.com/p/qdJ2PMwitA/)



Arsenio Hall @ArsenioHall · 16h

Hey @UncleRUSH, #RaiseUp is such a great idea/vehicle! #my2cents



Retweeted by Arsenio Hall



Russell Simmons @UncleRUSH · Jul 9

Amazing young poets + rappers vying for \$5k + DC trip! Support + VOTE now for best! [RaiseUpProject.org/contest-entries](http://RaiseUpProject.org/contest-entries) #RaiseUp



[RAISEUPPROJECT.ORG/CONTEST-ENTRIES](http://RAISEUPPROJECT.ORG/CONTEST-ENTRIES)



[View more photos and videos](#)

Retweeted by Arsenio #131



**Blanca** @Tweedia4027 · Jul 12

@ArsenioHall @georgelopez @BillCosby I grew up in an empty room just a small TV and afraid. But you made my life easier :( happy birthday!



[View conversation](#)



**Arsenio Hall** @ArsenioHall · Jul 14

Still HAPPY 🎵 ... Life is good! @OldenPolynice1  
[.instagram.com/p/qcMVWYQimo/](https://www.instagram.com/p/qcMVWYQimo/)




**Arsenio Hall** @ArsenioHall · Jul 14

You see this one from the @icehousecc @TeacherComedian?



[View more photos and videos](#)



 Arsenio Hall @ArsenioHall · Jul 13

#HMMMMMMMMMMMMMMMMMMMM

 Arsenio Hall @ArsenioHall · Jul 13

Went to a Soul Food restaurant this morning. There were NO black people working in the kitchen. None! I guess a Deen cookbook is all u need.

 Arsenio Hall @ArsenioHall · Jul 13

The Dutch team is THIRD in the #WorldCup2014! But, they got FIRST place weed.

 Arsenio Hall @ArsenioHall · Jul 13

#nuffsaid @TheOrlandoJones

[View conversation](#)

 Arsenio Hall @ArsenioHall · Jul 13

At the end of the day, I LOVE to make people laugh. And that love can't be cancelled! 😎


[instagram.com/p/qa1JoUwuo/](https://www.instagram.com/p/qa1JoUwuo/)



 **Arsenio Hall** @ArsenioHall · Jul 13

--> jayleno going on at The Comedy & Magic Club in Hermosa.  
I'm going home now to watch #Love&HipHop ATL.  
[.instagram.com/p/qasI26wikn/](https://www.instagram.com/p/qasI26wikn/)



 **Arsenio Hall** @ArsenioHall · Jul 13


#coachchad - Is this the dude from Bravo's Million Dollar Listing!?  
#worldcup2014 #germanrealestate  
[.instagram.com/p/qZ63m8Qitd/](https://www.instagram.com/p/qZ63m8Qitd/)



 **Arsenio Hall** @ArsenioHall · Jul 13

Wait! There is a black German player. Wonder what he thinks of  
Michael Jordan's mustache?! [.instagram.com/p/qZ4OL2Qinq/](https://www.instagram.com/p/qZ4OL2Qinq/)



 **Arsenio Hall** @ArsenioHall · Jul 13

Not many black Germans, huh?!  
#neggerplease #worldcup2014



 **Arsenio Hall** @ArsenioHall · Jul 13

Wow! RT @KingJames: The greatest sporting event I've ever  
been to! #WorldCupFinal #Brazil #StriveForGreatness  
[.instagram.com/p/qZwxjLCTFU/](https://www.instagram.com/p/qZwxjLCTFU/)



 **Arsenio Hall** @ArsenioHall · Jul 13

Love soccer crowds all singing/chanting together at the  
#worldcup2014. I'd like to hear the Clipper fans sing Drake's  
"Started at ... here".



 **Arsenio Hall** @ArsenioHall · Jul 13


Germany! The Harlem Globetrotters of  
soccer. #fifa #worldcup2014



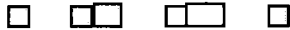
 **Arsenio Hall** @ArsenioHall · Jul 13

#TTMYSHmmm - I had a square pizza in Chicago. It fit perfect in the square box. Why is ANY pizza round? I've NEVER seen a round box! Hmmm!



 **Arsenio Hall** @ArsenioHall · Jul 13

O' Happy Day! @RealTracyMorgan is home! #blessings  
[.instagram.com/p/qZezA6wiiw/](https://www.instagram.com/p/qZezA6wiiw/)



Don't miss any updates  
from **Arsenio Hall**

Sign up for Twitter

Get instant updates on  
**#KickAssStarter**


Sign up for Twitter

✓ Everything

People

Photos

Videos

News

Timelines

Advanced Search

✓ Everywhere

Near you

© 2014 Twitter. About Help Terms Privacy  
Cookies Ad info Brand Blog Status Apps  
Jobs Advertise Business Media  
Developers Directory

## Results for #KickAssStarter

Top / All



**Stephanie Parra** · [StepParra08](#) · 13h

Watching @ArsenioHall & love that he wants to run @kickstarter - Do something in #education! #WeNeedIt #KickAssStarter #ArsenioSchoolHall 🙌

Phoenix, AZ

Expand



**Robert James Liguori** · [RobertLiguori](#) · 15h

#kickassstarter @arseniohall Sunglasses for a Gliesian

Expand



**Christine Rindler** · [ChristineWith4](#) · 15h

SIGNED 4 6300+sq ft store today!

#singlemom #determination #Startedfromthebottomnowwehere  
BumbleBeeBottomsBoutique.wordpress.com  
#kickassstarter

Expand



**Clement Morgan** · [CocaFile](#) · May 5

@ArsenioHall #kickassstarter Skin Dyes, you can be whatever color you like, the racists won't know what to do [pic.twitter.com/escCC695AF](https://pic.twitter.com/escCC695AF)

Expand



**green** · [mangreenicity](#) · Mar 24

JSYK: @MagicJohnson" one-sheet" 4 [stillmore.info/mg501c3](http://stillmore.info/mg501c3) sustain'd Urban HS grad GREEN, #JOBS @tvASPIRE #KickAssStarter @ArsenioHall



Urban



People · View all



**stillmore info** · stillmoreinfo · May 24

@ArsenioHall shut UP @RepPaulRyan and **#KickAssStarter** 501c3 get Urban HS grads work each summer [stillmore.info/mg](http://stillmore.info/mg) "one-sheet" @tvASPIRE

Expand



**NCCRecordsTHE Empire** · NCCRecordEmpire · May 2

#rt #teamfollowback SPONSOR OUR NEW ALBUMS/PROJECTS AND GET PRIZES AND CREDITS!!! [tinyurl.com/76nym8b](http://tinyurl.com/76nym8b) #AllHipHop #kickassstarter

Expand



**Myriam Hernández** · myriamhemandz · Feb 18

@ArsenioHall **#kickassstarter** tried to find the rock in the rock lol [pic.twitter.com/a1AfL6XbGf](http://pic.twitter.com/a1AfL6XbGf)

Scout!



**Arsenio TweetSeat** · ATweetSeat · Feb 17

@ArsenioHall Needs Your Suggestions For His **#KickAssStarter** [tmblr.co/ZDxU-o17mVUHj](http://tmblr.co/ZDxU-o17mVUHj) @Kickstarter #ArsenioHall #Inventors

Expand



**Black Dove Invictus** · Black Dove · Feb 17

People will love and appreciate you in their time of need, @ArsenioHall. Peace and Blessings. **#KickAssStarter**

View your profile





**Black Dove Invictus** · BlackDove Feb 17

Emergency Kits for people during power outages. People never really seem to be ready with things they need. @ArsenioHall #KickAssStarter

Expand



**Arsenio Hall** · ArsenioHall Feb 17

Got an idea for my Kickstarter campaign? Tweet it to me with: #KickAssStarter .arsen.io/M8aIBs

Expand



**Jacqueline Simard** · jacsimays Feb 17

Cancel your show #kickassstarter | @ArsenioHall

Expand



**Michael Levier** · lovelevier Feb 8

@ArsenioHall #kickassstarter besides a book and a movie, he should also be sitting on your couch .cbsnews.com/news/louisiana.....

Expand



**Michael Levier** · lovelevier Feb 8

@ArsenioHall #kickassstarter This story should be a book and a movie .cbsnews.com/news/louisiana.....

Expand



**Tiffany Haddish** · TiffanyHaddish Feb 9

Lol love it RT @lovelevier @TiffanyHaddish #IMABW #kickassstarter I could play the role of "Single Guy Who ... .tmi.me/1dCRHd

Expand



**beesnetwork** · beesprimetime Feb 8

#KickAssStarter Actually Has Some Good Ideas: .youtu.be/uVyTriRwi0g via @youtube

Expand



**With Great Care** · WithGreatCare Feb 4

@arseniohall #kickassstarter Help make it happen for With Great Care: The Music and The Movement on @indiegogo .igg.me/p/658512/twtr

Expand







**DEATHSTROKE** · Aedoeam · Feb 4

@ArsenioHall a bathroom mirror that takes selfies

**#kickassstarter**

Expand





**trinitywerks**

@mlcoachman

Cynthia, let ur friends kno the Trinity bags r  
now featured @ Lalo Fine Italian Handbags,  
110 E Andrews Dr in Buckhead.

[pic.twitter.com/cT6NIB0W](http://pic.twitter.com/cT6NIB0W)

Reply

Retweet

Favorite



2:44 PM - 24 May 2012

12:00 PM

Don't miss any updates from **trinitywerks**

[Redacted]

[Redacted]

Sign up for Twitter

© 2014 Twitler About Help Ads info



**trinitywerks**

@mlcoachman

Cynthia, let ur friends kno the Trinity bags r now featured @ Lalo Fine Italian Handbags, 110 E Andrews Dr in Buckhead.

[pic.twitter.com/cT6NIB0W](http://pic.twitter.com/cT6NIB0W)

Reply

Retweet

Favorite



2:44 PM - 24 May 2012

1/1

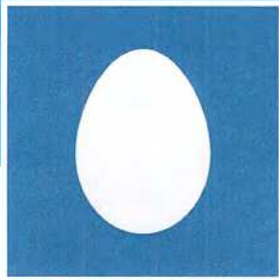
Don't miss any updates from **trinitywerks**

[Redacted]

[Redacted]

Sign up for Twitter

© 2014 Twitter · [About](#) · [Help](#) · [Ads info](#)



@mlcoachman

**trinitywerks**

TWEETS

6

PHOTOS/VIDEOS

4

FOLLOWING

2

More

Joined April 2012

Photos and videos

Tweets

Tweets and replies

**trinitywerks** @mlcoachman · 24 May 2012

Cynthia, let ur friends kno the Trinity bags r now featured @ Lalo Fine Italian Handbags, 110 E Andrews Dr in Buckhead.



**trinitywerks** @mlcoachman · 21 Apr 2012

Ms. Bailey , I am happy you like the bag.

Coach





 **trinitywerks** @mlcoachman · 21 Apr 2012

Ms. Bailey , I am happy you like the bag.

Coach



 **trinitywerks** @mlcoachman · 18 Apr 2012

Cynthia Bailey of Real Housewives of Atlanta rockin'  
TrinityWerks gear!



Don't miss any updates  
from **trinitywerks**

Sign up for Twitter





Have an account? Sign in ▼



**trinitywerks**  
mlcoachman

just got new shipment of bags

Reply

Retweet

Favorite



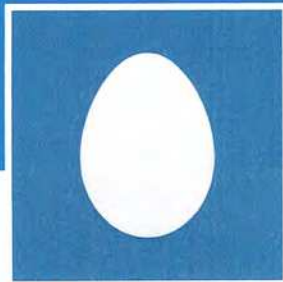
10:26 AM - 21 Apr 2012

Don't miss any updates from **trinitywerks**



Sign up for Twitter

© 2014 Twitter About Help Ads info



@mlcoachman

**trinitywerks**

TWEETS

6

PHOTOS VIDEOS

4

FOLLOWING

2

[More](#)

Joined April 2012

[Tweets](#)

[Tweets and replies](#)



trinitywerks @mlcoachman Feb 22

"@ArsenioHall check out the next big thing in Global Fashion: stylish, sexy & ergonomic bags and other leather goods #KickAssStarter".



trinitywerks @mlcoachman 24 May 2012

Cynthia, let ur friends kno the Trinity bags r now featured @ Lalo Fine Italian Handbags, 110 E Andrews Dr in Buckhead.



[View more photos and videos](#)



trinitywerks @mlcoachman 21 Apr 2012

just got new shipment of bags



 **trinitywerks** @mlcoachman · 21 Apr 2012

Ms. Bailey , I am happy you like the bag.

Coach



[View more photos and videos](#)

 **trinitywerks** @mlcoachman · 21 Apr 2012

Ms. Bailey , I am happy you like the bag.

Coach



[View more photos and videos](#)

 **trinitywerks** @mlcoachman · 18 Apr 2012

Cynthia Bailey of Real Housewives of Atlanta rockin' TrinityWerks gear!



[View more photos and videos](#)



Don't miss any updates  
from **trinitywerks**

Sign up for Twitter



Have an account? Sign in ▾



**trinitywerks**  
@mlcoachman

Ms. Bailey , I am happy you like the bag.

Coach [pic.twitter.com/de5qjHS8](https://pic.twitter.com/de5qjHS8)

Reply

Retweet

Favorite



6:59 AM - 21 Apr 2012





Don't miss any updates from **trinitywerks**

Sign up for Twitter

© 2014 Twitter About Help Ads info



Have an account? Sign in ▾



**trinitywerks**  
mlcoachman

Ms. Bailey , I am happy you like the bag.

Coach [pic.twitter.com/de5qjHS8](https://pic.twitter.com/de5qjHS8)

Reply

Retweet

Favorite



6:59 AM - 21 Apr 2012





© 2014 Twitter About Help Ads info





Have an account? Sign in ▼



**trinitywerks**

@mlcoachman

Ms. Bailey , I am happy you like the bag.

Coach [pic.twitter.com/uDwnKzOP](http://pic.twitter.com/uDwnKzOP)

Reply

Retweet

Favorite



6:53 AM - 21 Apr 2012



Don't miss any updates from **trinitywerks**

Sign up for Twitter

© 2014 Twitter About Help Ads info



Have an account? Sign in ▾



**trinitywerks**  
@mlcoachman

Ms. Bailey , I am happy you like the bag.

Coach [pic.twitter.com/uDwnKzOP](http://pic.twitter.com/uDwnKzOP)

Reply

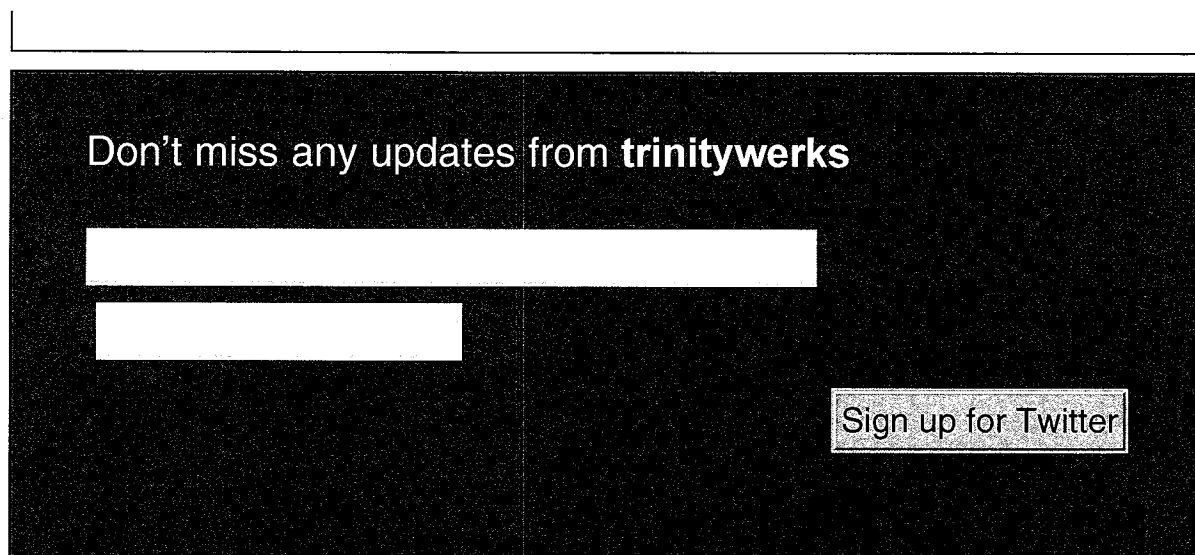
Retweet

Favorite



6:53 AM - 21 Apr 2012





© 2014 Twitter About Help Ads info





Have an account? Sign in ▾



**trinitywerks**

@mlcoachman

Cynthia Bailey of Real Housewives of  
Atlanta rockin' TrinityWerks gear!

[pic.twitter.com/3gXdoapm](http://pic.twitter.com/3gXdoapm)

Reply

Retweet

Favorite



9:52 PM - 18 Apr 2012



Don't miss any updates from **trinitywerks**

[Redacted]

[Redacted]

Sign up for Twitter

© 2014 Twitter About Help Ads info



Have an account? Sign in ▼



**trinitywerks**  
@mlcoachman

Cynthia Bailey of Real Housewives of  
Atlanta rockin' TrinityWerks gear!  
[pic.twitter.com/3gXdoapm](http://pic.twitter.com/3gXdoapm)

Reply

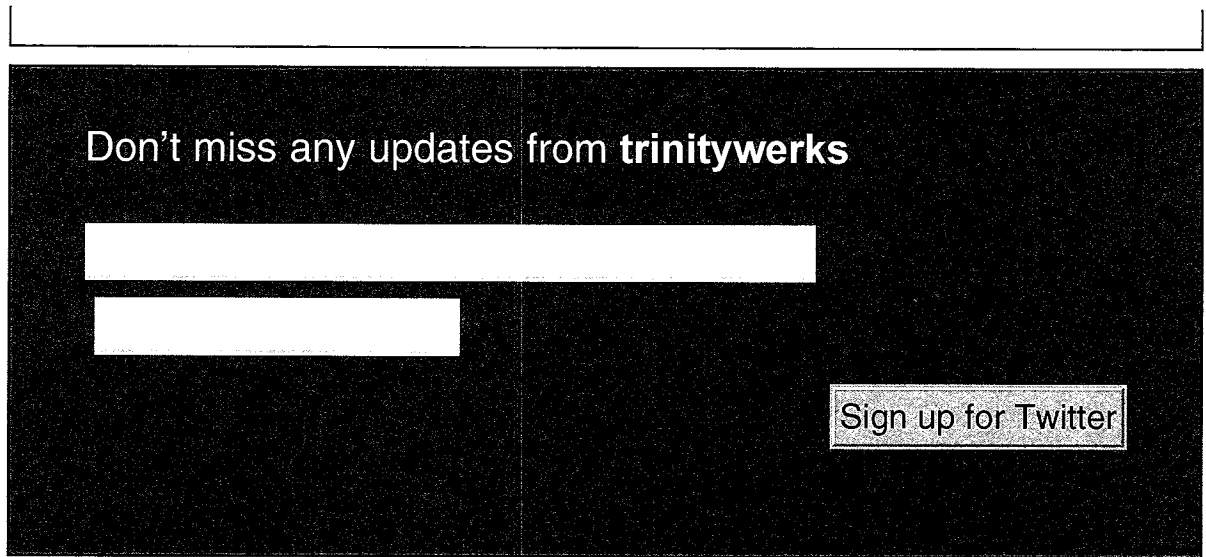
Retweet

Favorite



9:52 PM - 18 Apr 2012





© 2014 Twitter About Help Ads info