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

Proceeding	91209815
Party	Plaintiff Cartier International A.G.
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Signature	/Emily Weiss/
Date	02/12/2016
Attachments	Rebuttal Cohen Trial Declaration (F1877121x96B9E).pdf(665303 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

**REBUTTAL TRIAL DECLARATION OF ALISON COHEN**

ALISON COHEN declares under penalty of perjury as follows:

1. As set forth in my Trial Declaration, which was filed with the Trademark Trial and Appeal Board on October 30, 2015 (dkt. nos. 24 and 25), I am the Assistant Vice President, Merchandising and Jewelry Workshop, at Cartier, a division of Richemont North America, Inc. Cartier, a division of Richemont North America, Inc. is the U.S. affiliate of Opposer Cartier International A.G., and is the exclusive distributor and licensee of Cartier brand products in the United States. In this declaration, I refer to Cartier, a division of Richemont North America, Inc. and Opposer Cartier International A.G. as “Cartier.”

2. As a result of my current and previous job responsibilities, which are detailed in my October 30 Trial Declaration, I am familiar with the history and operations of Cartier and, among other things, its TRINITY products. I confirm that the facts and matters set out herein are based on my own knowledge and understanding and/or from my review of the records and documents of Cartier, which are prepared and kept in the regular course of business and to which I have access and that I rely on in my position at Cartier.

3. As detailed in my October 30 Trial Declaration, Cartier began to offer a TRINITY leather pouch for sale in the United States in November 2015. The leather pouch does not include the three intertwined bands in different metals that are often seen in Cartier's TRINITY jewelry products.

4. My October 30 Trial Declaration also detailed how Cartier uses its TRINITY mark, and examples of how Cartier uses the TRINITY mark were provided in several exhibits attached to my Trial Declaration. As shown in those exhibits, Cartier uses the TRINITY mark alone, including on Cartier's website and in advertisements for TRINITY products. Attached as **Exhibit CT 42** are further examples of advertisements for TRINITY products in which the TRINITY mark appears alone.

The undersigned being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001, declared that all statements made of her own knowledge are true; and all statements made on information and belief are believed to be true.

Declared under penalty of perjury, this 12th day of February, 2016 at New York, New York.

  
Alison Cohen

# **EXHIBIT CT 42**

*Cartier*



*Trinity collection*

Fifth Avenue - Beverly Hills - Chicago - Bal Harbour - Boston - Dallas - Lenox Square - Palm Beach - Palo Alto - Tro  
For a complete listing of all boutique locations, please call 1-800-cartier or visit [www.cartier.com](http://www.cartier.com)

Collection starting at \$750



New Trinity Collection

*Cartier*



©2004 Cartier

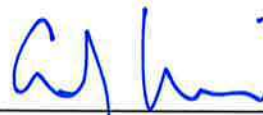
New Trinity Collection

*Cartier*

**CERTIFICATE OF SERVICE**

I hereby certify that I caused, on this 12th day of February 2016, a copy of the foregoing **REBUTTAL TRIAL DECLARATION OF ALISON COHEN** to be sent by email and by FedEx overnight to counsel for Lance Coachman:

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Emily Weiss