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Filing date: **02/12/2016**

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	Emily Weiss
Filer's e-mail	jmargiotta@fzlz.com, eweiss@fzlz.com, ykarzoan@fzlz.com
Signature	/Emily Weiss/
Date	02/12/2016
Attachments	Opposer's Second Notice of Reliance on Printed Publications (F1877141x96B9E).pdf(2794310 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 SECOND NOTICE OF RELIANCE ON PRINTED PUBLICATIONS

1. Pursuant to Rule 2.122(e) of the Trademark Rules of Practice and Section 704.08(b) of the Trademark Trial and Appeal Board Manual of Procedure, Opposer Cartier International A.G. (“Opposer”) hereby makes of record and notifies Applicant Lance Coachman (“Applicant”) of its reliance on the following Internet printouts. These documents are relevant to show that certain of the third parties that Applicant claims sell only handbags or only jewelry in fact have sold or sell both handbags and jewelry.

(a) February 5, 2016 printout from the website www.dkny.com showing that DKNY offers jewelry under the DKNY mark; a true and correct copy of which is attached hereto as **Exhibit CT 43**;

(b) February 5, 2016 printouts from the website www.stevemadden.com showing that Steve Madden offers jewelry under the STEVE MADDEN mark; true and correct copies of which are attached hereto as **Exhibit CT 44**; and

(c) February 5, 2016 printout from the website www.1stdibs.com showing that Van Cleef & Arpels has offered bags under the VAN CLEEF & ARPELS mark; a true and correct copy of which is attached hereto as **Exhibit CT 45**.

2. Pursuant to Rule 2.122(e) of the Trademark Rules of Practice and Section 704.08(b) of the Trademark Trial and Appeal Board Manual of Procedure, Opposer hereby makes of record and notifies Applicant of its reliance on the following Internet printouts relevant to show that Cartier uses the TRINITY mark standing alone on its website: February 5, 2016 printouts from the website www.cartier.us; true and correct copies of which are attached hereto as Exhibit CT 46.

Dated: New York, New York
February 12, 2016

FROSS ZELNICK LEHRMAN & ZISSU, P.C.

By: 

John Margiotta

Emily Weiss

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New York, New York 10017

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Email: jmargiotta@fzlz.com

eweiss@fzlz.com

Attorneys for Opposer Cartier International A.G.

EXHIBIT CT 43

SHOP

DKNY

BAG

[HOME](#) > [ACCESSORIES](#) > [ACCESSORIES](#) > [SALE](#) > **ENGRAVED TRIBAL CHOKER NECKLACE**





ENGRAVED TRIBAL CHOKER NECKLACE

STYLE NUMBER: D743332

~~\$85.00~~ **\$26.00**

COLOR

QTY

SIZE

1 ▼

SELECT SIZE ▼

CAN'T FIND YOUR SIZE?

THE STYLE YOU HAVE SELECTED IS NO LONGER AVAILABLE.

ADD TO BAG

SHARE



DESCRIPTION +

FABRIC & CARE +

RECENTLY VIEWED



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[SHOP](#)

DONNA KARAN
NEW YORK

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LLC

[SITEMAP +](#)

EXHIBIT CT 44

STEVE MADDEN

WHAT'S NEW

WOMEN'S

MEN'S

HANDBAGS

ACCESSORIES

SALE

CLEARANCE

FREEBIRD BY STEVEN

TRENDS

SM WORLD

PRISONER OF LOVE PAVE HEART EARRINGS

PRISONER OF
LOVE PAVE
HEART
EARRINGS

B11049-E01

\$40.00

[WRITE A REVIEW](#)

COLOR: PINK - \$40.00



SIZE:

ONESZ

IN STOCK

QTY:

1



ADD TO BAG

[LOVE IT!](#)[f LIKE](#)[f SHARE](#)

LIKE



SHARE



TWEET



PIN IT



EMAIL

DETAILS

- PAVE HEART LOCK

DETAILS

- PAVE HEART LOCK DROP EARRING
- POT BLACK PLATED HEART-SHAPED LOCK DROP
- PINK TONE COLORED PAVE CRYSTAL ACCENTS AND CRYSTAL HEART ACCENT AT POST
- POST BACK
- METAL/GLASS
- 1.5" LENGTH
- 0.8" WIDTH

Free Shipping over \$50

with code SMFREE50

continental U.S. only

YOU MAY ALSO LIKE



STECY
\$79.95



FRINGLY
\$49.98



GORGEOUS
\$149.95

BE THE FIRST! SHOW US HOW YOU WEAR IT

TAG YOUR PHOTOS #STEVMADDEN TO BE FEATURED ON OUR WEBSITE


[UPLOAD YOUR PHOTO](#)
[VIEW GALLERY](#)

[?]

REVIEWS


[BE THE FIRST TO REVIEW THIS PRODUCT](#)

RECENTLY VIEWED



TUTTI FRUTTI APPLE PENDANT LONG NECKLACE

~~\$45.00~~ **\$19.99**

CUSTOMER SERVICE

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EMAIL SIGNUP

GET 10% OFF WHEN YOU SIGN UP FOR EMAILS

GO

Steven Madden, Ltd. requires that our customers comply with The Children's Online Privacy Protection Act which prohibits the collection of any information from children under the age of 13.



LIVE CHAT

INFO@STEVMADDENDIRECT.COM

1-888-SMADDEN



STEVE MADDEN

WHAT'S NEW

WOMEN'S

MEN'S

HANDBAGS

ACCESSORIES

SALE

CLEARANCE

FREEBIRD BY STEVEN

TRENDS

SM WORLD

TUTTI FRUTTI APPLE PENDANT LONG NECKLACE



TUTTI FRUTTI APPLE PENDANT LONG NECKLACE

B10270-N01

~~\$45.00~~ \$19.99

★★★★★

[WRITE A REVIEW](#)COLOR: RED - ~~\$45.00~~ \$19.99

SIZE:

QTY:

ONESZ

1

IN STOCK

ADD TO BAG

♥ LOVE IT!

f LIKE
f SHARE

* Clearance items and gift cards are final sale.

No refunds, returns or exchange.

* Due to very low inventory, there may be delays in shipping this item

f LIKE

f SHARE

🐦 TWEET

📌 PIN IT

✉ EMAIL

DETAILS

* Clearance items and gift cards are final sale.

No refunds, returns or exchange.

* Due to very low inventory, there may be delays in shipping this item

f LIKE

f SHARE

🐦 TWEET

📌 PIN IT

✉ EMAIL

DETAILS

 THE APPLE OF YOUR
 EYE! GOLD TONE LONG
 NECKLACE CHAIN WITH

NECKLACE CHAIN
RED FACETED APPLE
PENDANT,

- GOLD TONE LONG NECKLACE CHAIN
- RED FACETED APPLE PENDANT
- LOBSTER CLAW
- METAL/PLASTIC
- 28" LENGTH + 3" EXTENDER; PENDANT WIDTH 1"; PENDANT DROP 1.5"
- LOBSTER CLAW
- METAL/PLASTIC
- 28" LENGTH + 3" EXTENDER; PENDANT WIDTH 1"; PENDANT DROP 1.5"

SHIPPING & RETURNS



* CLEARANCE ITEMS AND GIFT CARDS
ARE FINAL SALE. NO REFUNDS,
RETURNS OR EXCHANGE.



Free Shipping over \$50

with code SMFREE50

continental U.S. only

YOU MAY ALSO LIKE



2/5/16



STECY
\$79.95

Tutt Frutti Apple Pendant Long Necklace



FRINGLY
\$49.98



GORGEOUS
\$149.95

BE THE FIRST!
SHOW US HOW YOU WEAR IT

TAG YOUR PHOTOS #STEVE MADDEN TO BE FEATURED ON OUR WEBSITE



UPLOAD YOUR PHOTO

[VIEW GALLERY](#)

[?]

REVIEWS



BE THE FIRST TO REVIEW THIS PRODUCT

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PRISONER OF LOVE PAVE HEART EARRINGS

\$40.00

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INFO@STEVE-MADDEN-DIRECT.COM
[1-888-5MADDEN](tel:1-888-5MADDEN)



EXHIBIT CT 45



Vintage Signed Van Cleef & Arpels Paris Bag

\$900

\$9 shipping to Continental US. Other shipping rates available.

REQUEST MORE INFO

Jeweldiva®

1stdibs dealer since 2012
Located in New York

DETAILS

Creator

Van Cleef & Arpel Paris

Designer

Van Cleef & Arpel Paris

Place of Origin

Paris

Date of Manufacture

20th century

Other Characteristics

Fabric & goldtone accents

Condition

Excellent. Excellent & with the original box.

Wear

Wear consistent with age and use

Dimensions

5.25in. H x 8.75in. W

13cm H x 22cm W

Dealer Location

New York, NY

Dealer Reference Number

AC-356

Number of Items

1

Reference Number

AU130617334400

SHIPPING & RETURNS

Shipping Estimate

\$9 shipping to Continental US.
Other shipping rates available.

Returns Policy

This item cannot be returned or exchanged.

Tell Us What You Think +

EXHIBIT CT 46



Cartier

Complimentary standard shipping on all orders

COLLECTIONS

THE MAISON

SERVICES

JEWELRY

WATCHES

ENGAGEMENT

ACCESSORIES

FRAGRANCES

GIFTS

Cartier - Trinity

CLOSE

TRINITY

▶ 0:04 / 1:22

TRINITY DE CARTIER

Three bands. Three colors. Pink gold, yellow gold and white gold, intertwined in a display of mystery and harmony. The visionary mind of Louis Cartier created the Trinity ring in 1924. Jean Cocteau promptly made the piece his own. Encircled in the glow of the literary world inhabited by the poet, the ring quickly earned iconic status. Three types of gold. Three symbolic colors: pink for love, yellow for fidelity and white for friendship. Trinity, a timeless design now available in a collection devoted to life's most memorable loves. Trinity, all about you forever.

BROWSE BY CATEGORY

VIEW ALL

4 Categories



TRINITY DE CARTIER RINGS



TRINITY DE CARTIER BRACELETS



TRINITY DE CARTIER NECKLACES



TRINITY DE CARTIER EARRINGS

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Cartier - Trinity

CLOSE

TRINITY.
LOVE.

▶ 1:11 / 1:22

TRINITY DE CARTIER

Three bands. Three colors. Pink gold, yellow gold and white gold, intertwined in a display of mystery and harmony. The visionary mind of Louis Cartier created the Trinity ring in 1924. Jean Cocteau promptly made the piece his own. Encircled in the glow of the literary world inhabited by the poet, the ring quickly earned iconic status. Three types of gold. Three symbolic colors: pink for love, yellow for fidelity and white for friendship. Trinity, a timeless design now available in a collection devoted to life's most memorable loves. Trinity, all about you forever.

BROWSE BY CATEGORY

VIEW ALL

4 Categories



TRINITY DE CARTIER RINGS



TRINITY DE CARTIER BRACELETS



TRINITY DE CARTIER NECKLACES



TRINITY DE CARTIER EARRINGS

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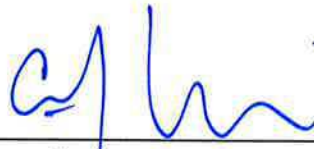
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CERTIFICATE OF SERVICE

I hereby certify that I caused, on this 12th day of February 2016, a copy of the foregoing **OPPOSER'S SECOND NOTICE OF RELIANCE ON PRINTED PUBLICATIONS** 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