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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.
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Signature	/Emily Weiss/
Date	02/12/2016
Attachments	Opposer's Second Notice of Reliance on Deposition Testimony (F1877148-2x96B9E).pdf(5880959 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 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 47**:

- Page 9, line 1 through page 10, line 22.
- Page 91, line 7 through page 92, line 16.
- Page 93, line 25 through page 94, line 9.
- Page 110, line 5 through page 113, line 2.
- Page 125, lines 14-19.
- Page 126, lines 20-22.

Dated: New York, New York
February 12, 2016

FROSS ZELNICK LEHRMAN & ZISSU, P.C.

By: 

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EXHIBIT CT 47

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

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



1 Q. Are you currently employed?

2 A. I am.

3 Q. Who is your current employer?

4 A. EXI, Inc.

5 Q. How long have you been working there?

6 A. 20 years, 22 years.

7 Q. What is the business of EXI?

8 A. Executive search firm.

9 Q. What is your current position there?

10 A. President.

11 Q. Are you the founder too?

12 A. Co-founder.

13 Q. Was it founded 22 years ago?

14 A. It was.

15 Q. So what are your duties as president and  
16 co-founder?

17 A. Business development, training, client  
18 relations.

19 Q. What was your previous work experience before  
20 you founded this firm?

21 A. I started with Bristol-Myers Squibb and before  
22 that I worked for another search firm.

23 Q. So Bristol-Myers Squibb was immediately  
24 preceding --

25 A. Well, the other search firm, then

1 Bristol-Myers Squibb, when I left Florida A&M. It was  
2 Bristol-Myers at the time. It is now Bristol-Myers  
3 Squibb.

4 Q. Approximately what years did you work there?

5 A. From 1985 to 1989.

6 Q. What was your position?

7 A. Sales rep.

8 Q. What were your general duties?

9 A. Pharmaceutical sales.

10 Q. And then you said, I believe you said there  
11 was one job?

12 A. Right, I worked for another search firm, then  
13 co-founded my own.

14 Q. What is the name of this other search firm?

15 A. ExecuSearch.

16 Q. What was your position there?

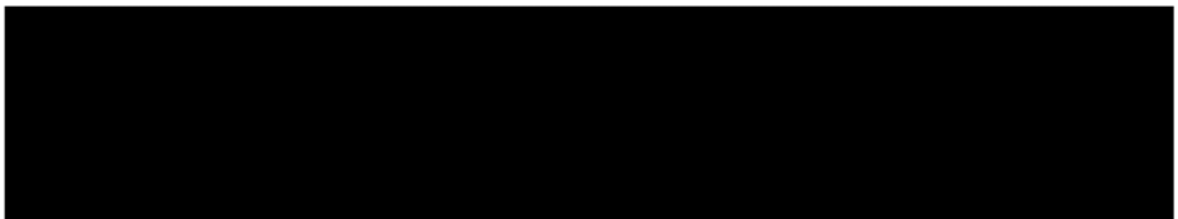
17 A. I was a recruiter.

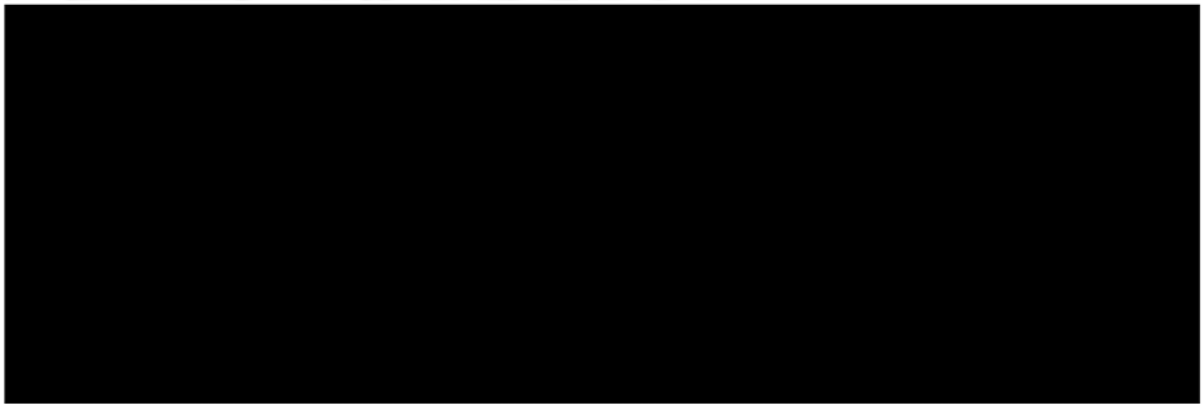
18 Q. Approximately what years did you work there?

19 A. Like from '89 to '92.

20 Q. And then around '92 is when you founded your  
21 own search firm?

22 A. Yes.





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7 Q. Return to the first page of this exhibit,  
8 Applicant 0060. Look at your most recent tweet dated  
9 February 22. Is this your own tweet or something you  
10 re-tweeted from someone else?

11 A. Arsenio Hall is a late night talk show host  
12 and he had a Kick Starter campaign which my  
13 brother-in-law told me about, they were looking for  
14 interesting products. So I tweeted.

15 I also went to the fish, the Shark Tank had an  
16 Atlanta audition. I went to that as well. And I sent  
17 this to Arsenio Hall, a tweet saying that I had a  
18 unique product which I was hoping to get some attention  
19 from him about.

20 Q. So this tweet dated February 22, was a tweet  
21 that you wrote?

22 A. Curt actually helped me write it. I don't  
23 actually tweet.

24 Q. This is a tweet from your own account?

25 A. Yes.

1 Q. It is not a tweet by Arsenio Hall?

2 A. No, it is to Arsenio Hall. He had a Kick  
3 Starter campaign in which he is looking for different  
4 and unusual and new products.

5 Q. Did anything come of this tweet to Arsenio  
6 Hall?

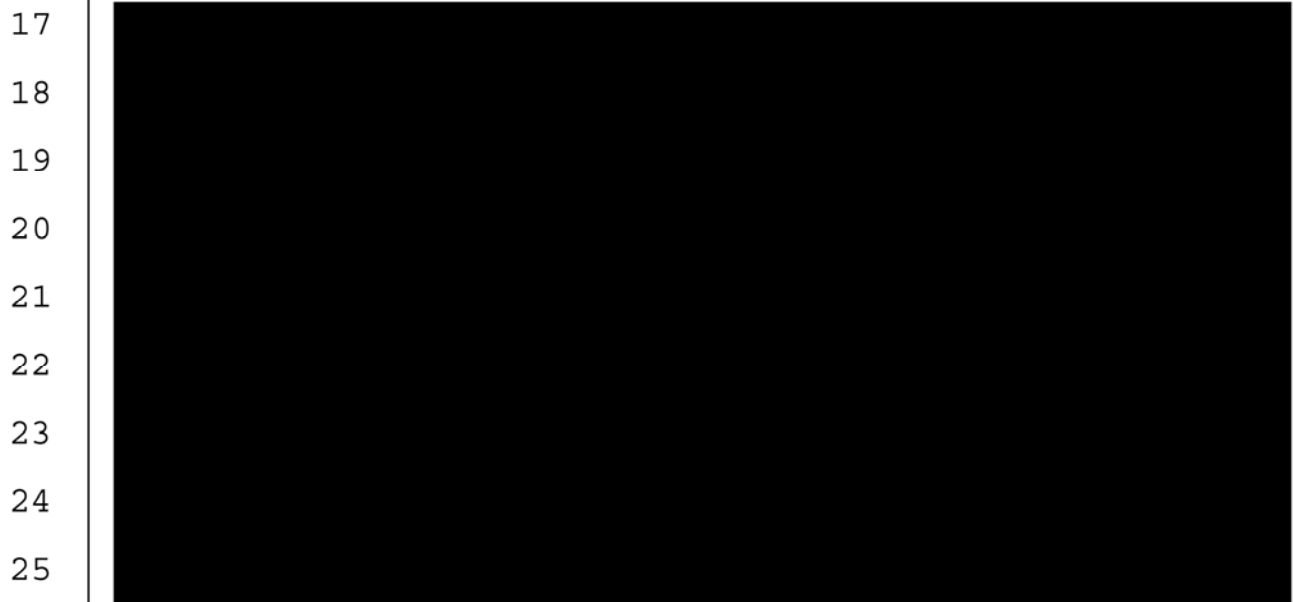
7 A. Not yet.

8 Q. What is this #KickAssStarter?

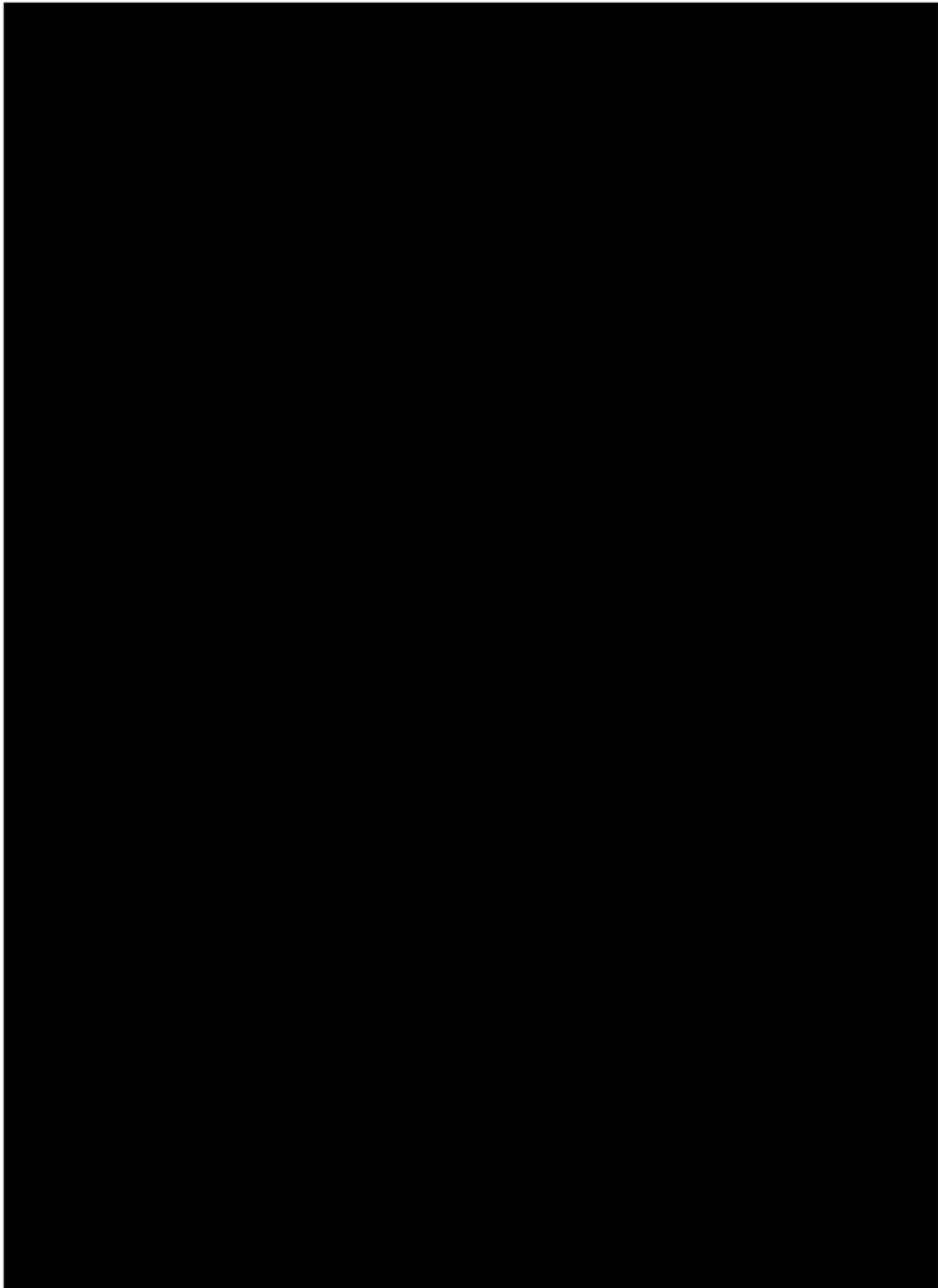
9 A. That's his account, is called Kick Ass  
10 Starter, which they are using to look, I guess it is a  
11 derivative of the Kick Starter program. And that is  
12 his, Kick Ass is his, I guess, hash tag or whatever he  
13 uses.

14 Q. So were the instructions --

15 A. To send it to Kick Ass Starter so he would  
16 know that's what you were trying to do.



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Q. And you mentioned the Shark Tank television

1 show?

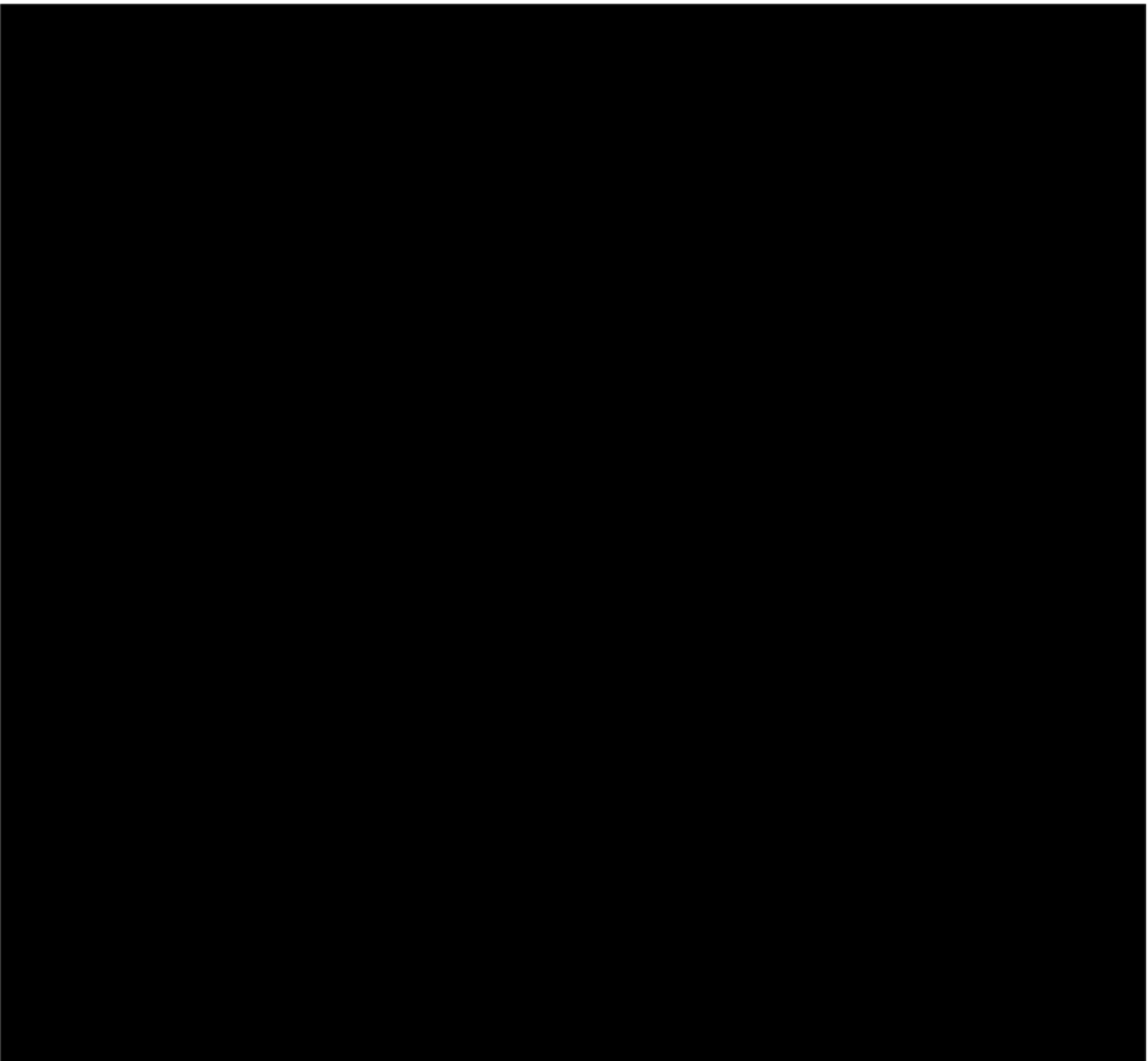
2 A. Yes.

3 Q. What was your involvement with that?

4 A. They go to different cities looking for  
5 products. And I stood in line for about eight hours to  
6 get in for a 30-second pitch. And they didn't take it.

7 Q. Have you had any further communications with  
8 people associated with Shark Tank?

9 A. No.



1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 Q. You can put that exhibit aside. Please take  
6 out Exhibit 4 again which would be in that pile. Turn  
7 to Page 11, please.

8 Specifically look at your response to  
9 Interrogatory No. 18. And you state that you visited  
10 various department stores and handbag boutiques to look  
11 at the quality of the leather and craftsmanship of  
12 handbags that are offered for sale in order to set up  
13 pricing for the Trinity leather handbag based on  
14 comparable handbags.

15 Which stores did you visit?

16 A. Macy's, Neiman's, Saks, the high-end boutiques  
17 in Phipps Plaza and some of the boutiques in Buckhead.

18 Q. So all stores in Atlanta?

19 A. I went to a few stores outside of Atlanta but  
20 primarily in Atlanta.

21 Q. What cities were the stores outside of  
22 Atlanta?

23 A. When I was in Chicago I went and looked in  
24 some of the stores, boutiques.

25 Q. On these store visits, did you also discuss



1 distribution with employees at the store?

2 A. I asked them how they got their distribution  
3 and whether they could buy individual products. And  
4 most of them told me that there was some central buying  
5 authority which they didn't control.

6 But I did ask how they got the products, who  
7 decided for them to come in and how they knew what they  
8 were going to carry. They pretty much said somebody in  
9 corporate decides on what we buy.

10 Q. Did you conduct these store visits described  
11 in your response to Interrogatory No. 18 before or  
12 after you placed your order for the handbags with --

13 A. I already had the handbags in hand when I went  
14 over there.

15 Q. For example, you said you visited Neiman  
16 Marcus and then before the break you mentioned visiting  
17 Neiman Marcus with respect to distribution. Is that  
18 the same visit?

19 A. Yes. I wanted to know who decided what they  
20 carry.

21 Q. And the same with Saks, it was just one visit?

22 A. Right, right.

23 Q. So in your response to Interrogatory No. 18  
24 you specifically mention a discussion you had with  
25 representatives of the Macy's department store.



1 A. Yes.

2 Q. How many meetings did you have with Macy's  
3 representatives?

4 A. One.

5 Q. When was that?

6 A. If I had to estimate, it would be 2012.

7 Q. Do you know the first half, the second half?

8 A. I don't know.

9 Q. Were these in person?

10 A. Yes.

11 Q. Was it a prearranged meeting or --

12 A. No.

13 Q. Did you arrive and ask to speak?

14 A. No, I asked to speak to the manager for the  
15 bag department.

16 Q. Was Macy's interested in carrying the Trinity  
17 bags?

18 A. She couldn't commit because she said central  
19 purchasing decides. She liked the bag personally. But  
20 she said she had no input into what they carry.

21 Q. Is that why she suggested that you go meet  
22 with Macy's buyers in New York?

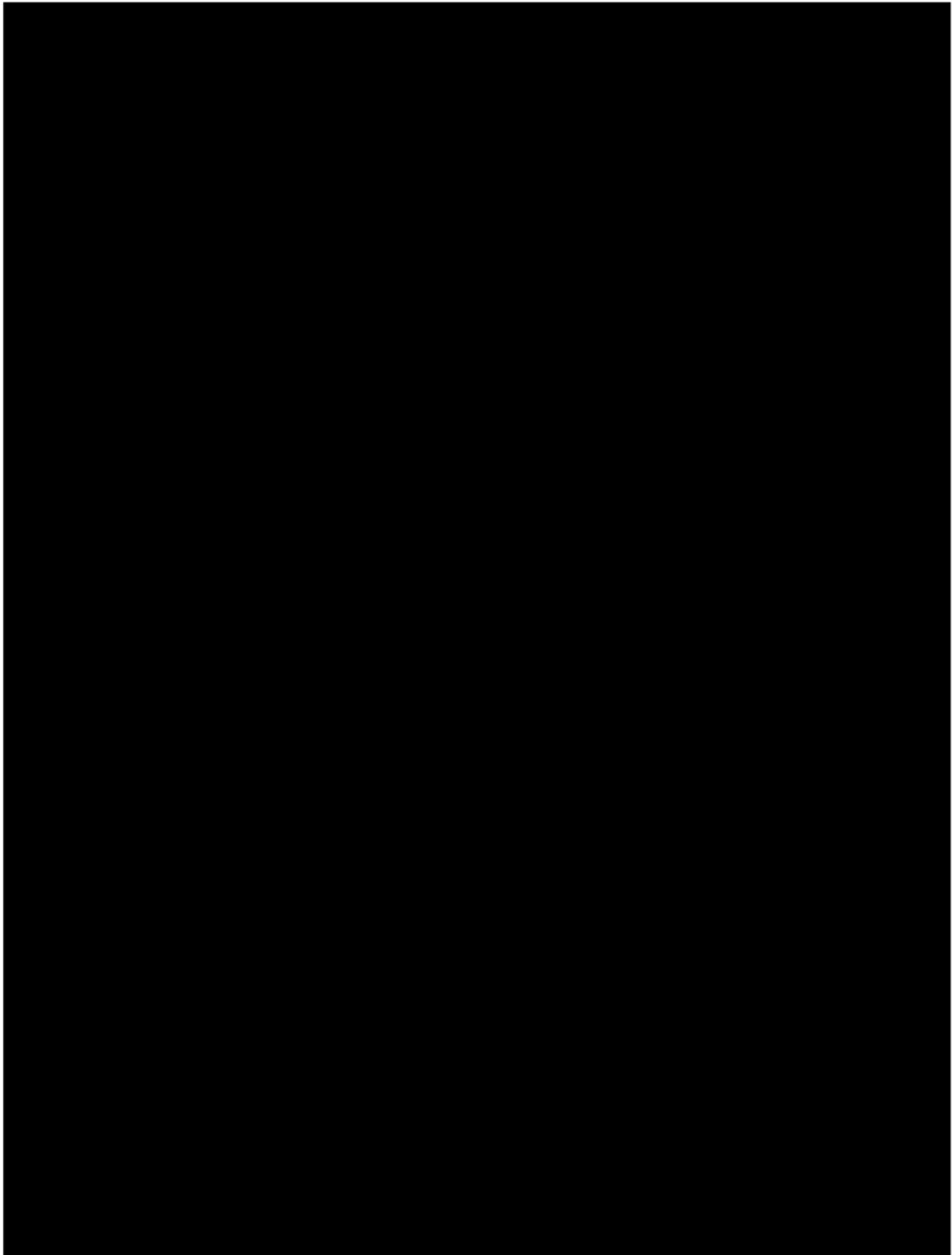
23 A. Exactly.

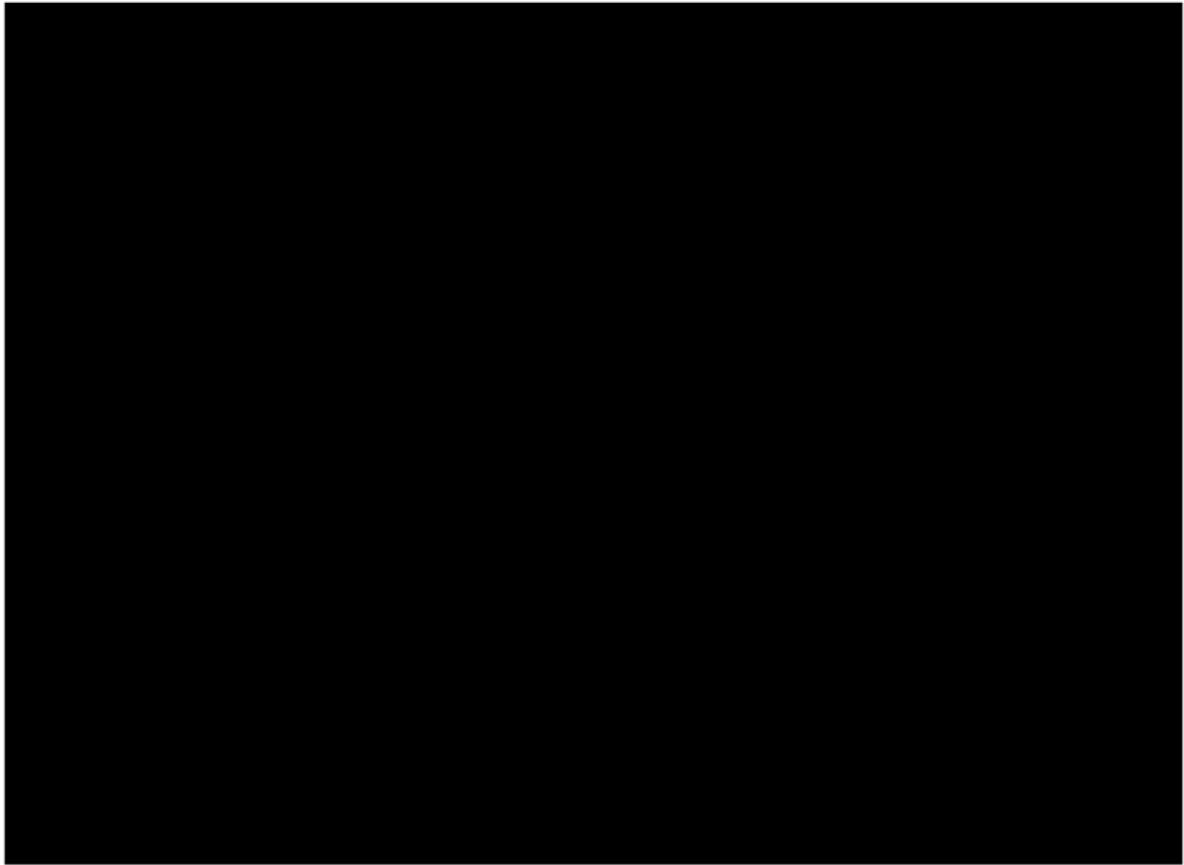
24 Q. Did you ever do that?

25 A. No.

1 Q. Do you intend to do it?

2 A. I do.



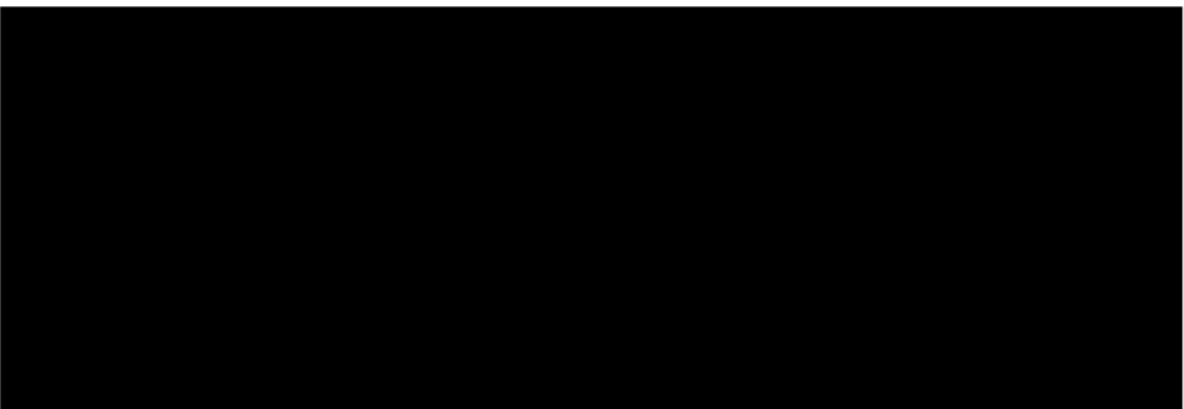


Are you aware of any third parties that use a name or trademark that contains the term Trinity in connection with bags or jewelry?

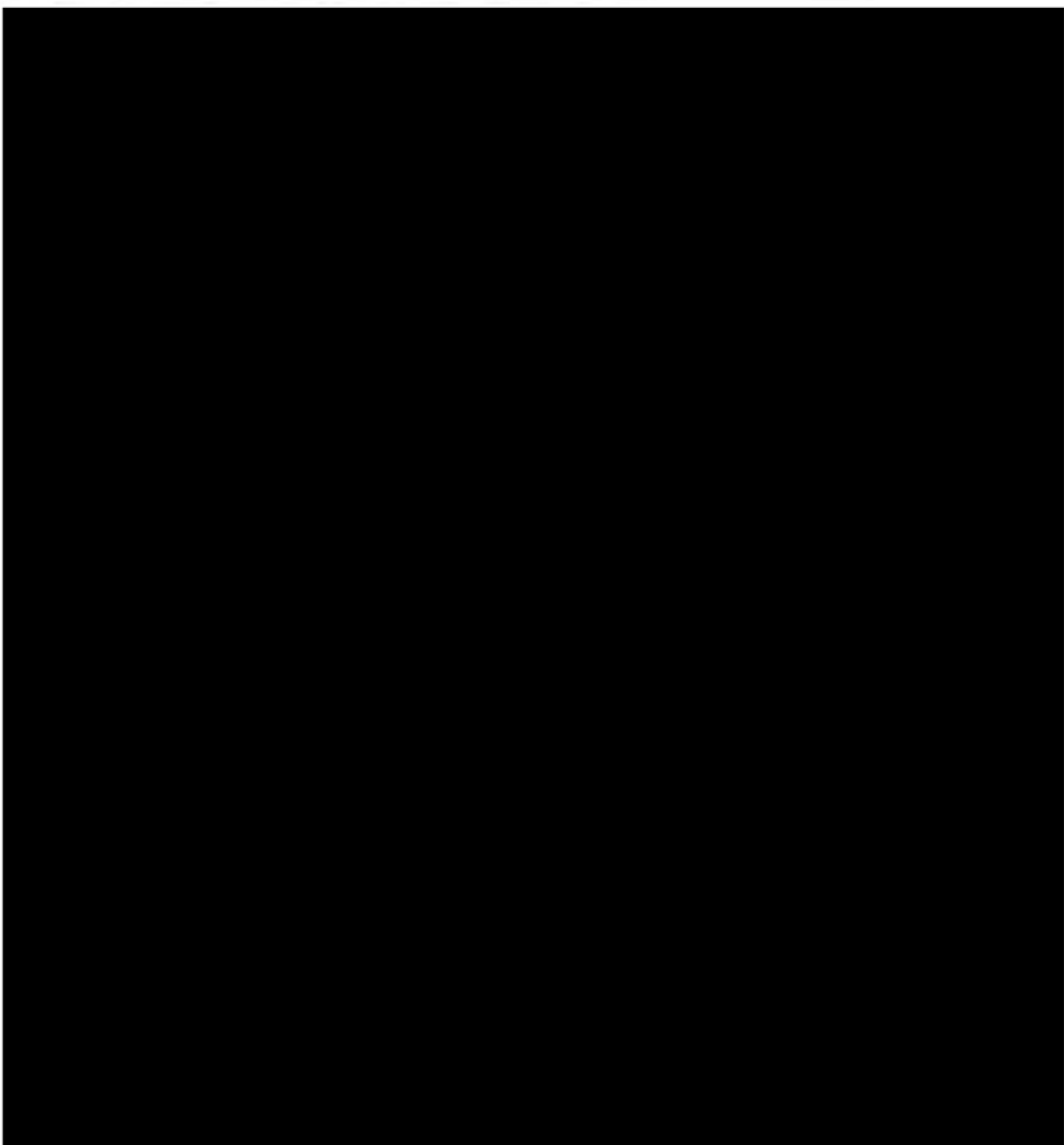
A. I am not.

Q. No third parties?

A. No, I am not aware of any third parties.

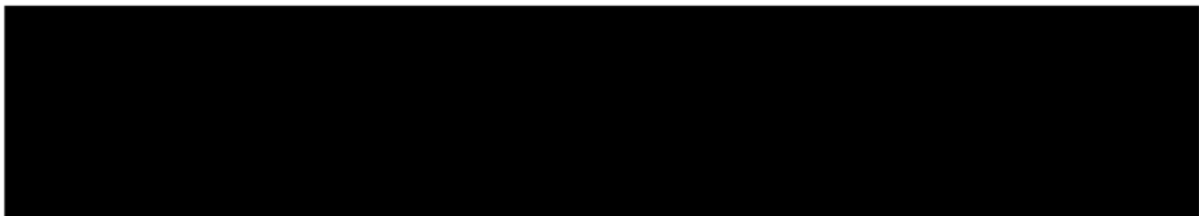


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And no other third parties that contain the  
term Trinity?

A. None that I am aware of.



C E R T I F I C A T E

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages 1 through 142 represent a true, complete, and correct transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.

This, the 22nd day of September, 2014.



RICHARD BURSKY, RMR, CRR, CCR

COURT REPORTER DISCLOSURE

Pursuant to Article 10.B. of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia which states: "Each court reporter shall tender a disclosure form at the time of the taking of the deposition stating the arrangements made for the reporting services of the certified court reporter, by the certified court reporter, the court reporter's employer, or the referral source for the deposition, with any party to the litigation, counsel to the parties or other entity. Such form shall be attached to the deposition transcript," I make the following disclosure:

I am a Georgia Certified Court Reporter. I am here as a representative of Esquire Deposition Solutions. Esquire Deposition Solutions was contacted to provide court reporting services for the deposition. Esquire Deposition Solutions will not be taking this deposition under any contract that is prohibited by O.C.G.A. 9-11-28 (c).

Esquire Deposition Solutions has no contract/agreement to provide reporting services with any party to the case, any counsel in the case, or any reporter or reporting agency from whom a referral might have been made to cover this deposition. Esquire Deposition Solutions will charge its usual and customary rates to all parties in the case, and a financial discount will not be given to any party to this litigation.



RICHARD BURSKY, RMR, CRR, CCR-2509

**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

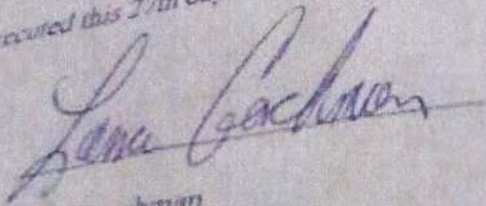
*Attorneys for Applicant*

**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.

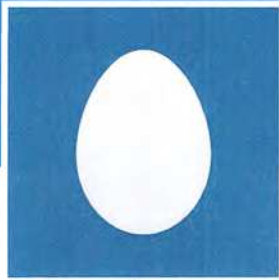
Lance Coachman

**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



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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.



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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



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 trinitywerks @mlcoachman · 18 Apr 2012

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





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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)



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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?



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#Hmmmmmmmmmmmmmmmmmmmmmm



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.



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



#nuffsaid @TheOrlandoJones



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

[instagram.com/p/ga1JoUwuo/](https://www.instagram.com/p/ga1JoUwuo/)



 **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/)



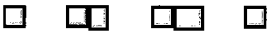
 **Arsenio Hall** @ArsenioHall · Jul 13

#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



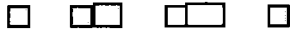
 **Arsenio Hall** @ArsenioHall · Jul 13

#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/)



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## Results for #KickAssStarter

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

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

Phoenix, AZ

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

#kickassstarter @arseniohall Sunglasses for a Gliesian

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

SIGNED 4 6300+sq ft store today!

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

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**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)

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**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



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**stillmore info** · stillmoreinfo · May 24

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

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**NCCRecordsTHE Empire** · NCCRecordEmpire · May 2

#rt #teamfollowback SPONSOR OUR NEW ALBUMS/PROJECTS AND GET PRIZES AND CREDITS!!! tinyurl.com/76nym8b #AllHipHop #kickassstarter

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**Myriam Hernández** · myriamhemandz · Feb 18

@ArsenioHall **#kickassstarter** tried to find the rock in the rock lol pic.twitter.com/a1AfL6XbGf

Expand



**Arsenio TweetSeat** · ATweetSeat · Feb 17

@ArsenioHall Needs Your Suggestions For His **#KickAssStarter** .tmblr.co/ZDxU-o17mVUHj @Kickstarter #ArsenioHall #Inventors

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

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

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**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

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**Arsenio Hall** · ArsenioHall Feb 17

Got an idea for my Kickstarter campaign? Tweet it to me with: #KickAssStarter .arsen.io/M8alBs

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**Jacqueline Simard** · jacqsays Feb 17

Cancel your show #kickassstarter | @ArsenioHall

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**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.....

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**Michael Levier** · lovelevier Feb 8

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

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**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

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12:00 PM

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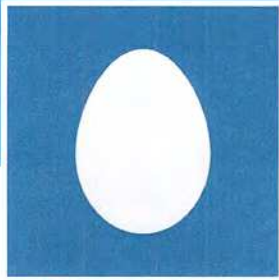
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**trinitywerks** @mlcoachman · 21 Apr 2012

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!



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just got new shipment of bags

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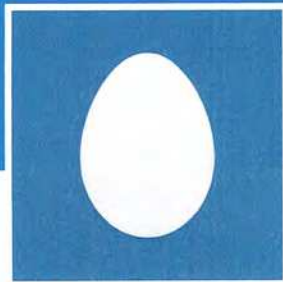
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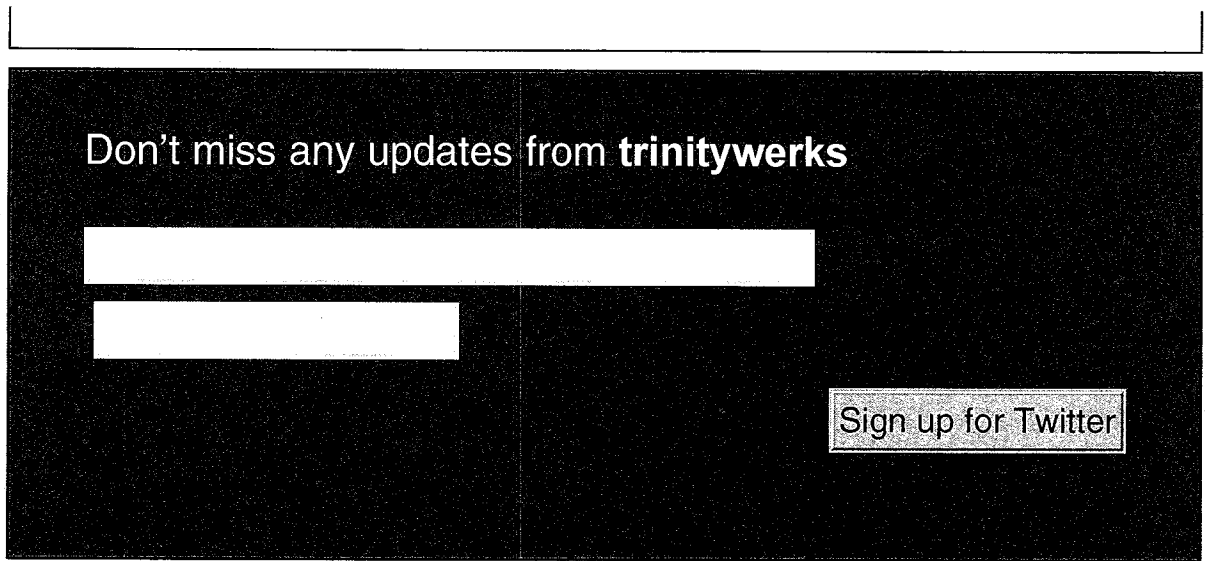
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mlcoachman

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

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

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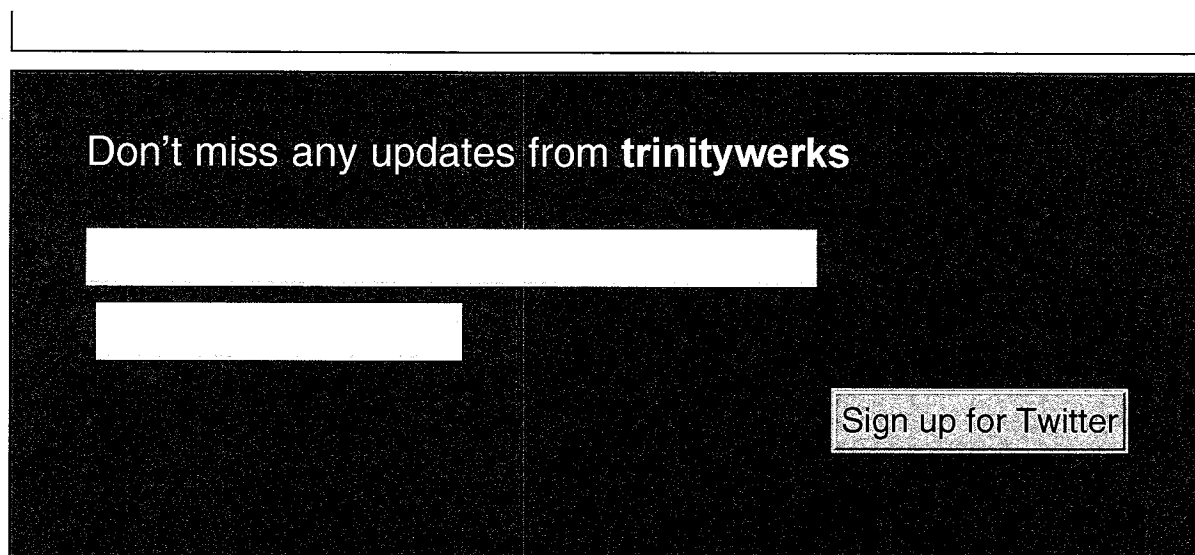
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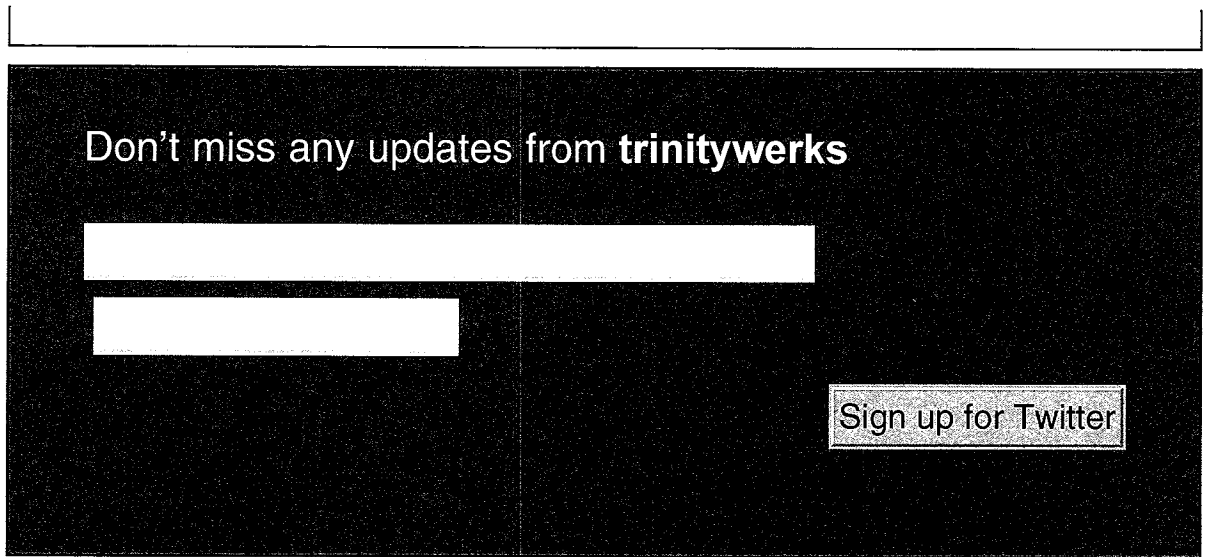
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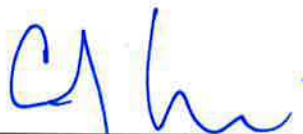


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**CERTIFICATE OF SERVICE**

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 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

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Emily Weiss