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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.
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
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Signature	/Emily Weiss/
Date	02/12/2016
Attachments	Opposer's Second Notice of Reliance on Discovery Responses (F1877150x96B9E).pdf(1333762 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

OPPOSERS' SECOND NOTICE OF RELIANCE ON DISCOVERY RESPONSES

Pursuant to Rule 2.120(j) of the Trademark Rules of Practice and Section 704.10 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 Applicant's responses to Opposer's Interrogatory Nos. 18 and 19, dated March 27, 2014, a true and correct copy of which is attached hereto as **Exhibit CT 48**.

Dated: New York, New York
February 12, 2016

FROSS ZELNICK LEHRMAN & ZISSU, P.C.

By: 

John Margiotta
Emily Weiss

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Attorneys for Opposer Cartier International A.G.

EXHIBIT CT 48

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

CARTIER INTERNATIONAL A.G.,)	
)	
Opposer,)	
)	Opposition No. 91209815
v.)	
)	App. Serial No. 85/6040000
LANCE COACHMAN,)	
)	Mark: TRINITY
Applicant.)	
)	
)	

**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

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. 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.

Date: March 27, 2014

Respectfully submitted,

LANCE COACHMAN

By: / Reginald J. Hill /

Reginald J. Hill
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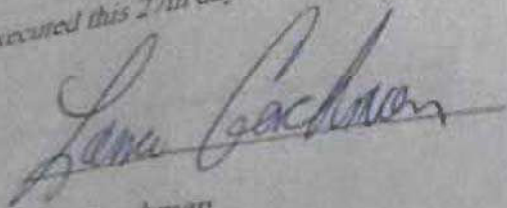
Attorneys for Applicant

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:

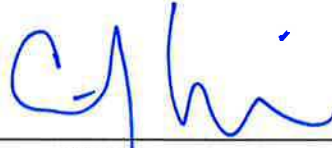
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Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that I caused, on this 12th day of February 2016, a copy of the foregoing **OPPOSERS' SECOND NOTICE OF RELIANCE ON DISCOVERY RESPONSES** 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