

ESTTA Tracking number: **ESTTA685202**

Filing date: **07/22/2015**

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

**Notice of Opposition**

Notice is hereby given that the following party opposes registration of the indicated application.

**Opposer Information**

Name	4 PILLAR DYNASTY LLC		
Entity	LIMITED LIABILITY COMPANY	Citizenship	NEW YORK
Address	525 SEVENTH AVENUE 16TH FLOOR NEW YORK, NY 10018 UNITED STATES		

Correspondence information	Leon Hedvat Vice-President 4 PILLAR DYNASTY LLC 525 SEVENTH AVENUE 16TH FLOOR NEW YORK, NY 10018 UNITED STATES leonhedvat@gmail.com Phone:2127306661
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**Applicant Information**

Application No	86328601	Publication date	06/23/2015
Opposition Filing Date	07/22/2015	Opposition Period Ends	07/23/2015
Applicants	Pedro Javier Diaz Rangel 2250 avenida magnifica apt D Carlsbad, CA 92008 UNITED STATES  Susana Teran 2250 avenida magnifica apt D Carlsbad, CA 92008 UNITED STATES		


**Goods/Services Affected by Opposition**

Class 025. First Use: 2014/07/02 First Use In Commerce: 2014/07/02 Opposed goods and services in the class: Apparel, namely, t-shirts, shirts, shorts, pants, sweatshirts, sweatpants, jackets, hats, bathing suits
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**Grounds for Opposition**

Deceptiveness	Trademark Act section 2(a)
False suggestion of a connection	Trademark Act section 2(a)
Priority and likelihood of confusion	Trademark Act section 2(d)
Dilution	Trademark Act section 43(c)

## Mark Cited by Opposer as Basis for Opposition

U.S. Application No.	86417870	Application Date	10/08/2014
Registration Date	NONE	Foreign Priority Date	NONE
Word Mark	REVERSE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 025. First use: First Use: 2012/01/10 First Use In Commerce: 2012/01/10 Pants, jeans, coats, shirts, jackets, yoga pants and tops, sports bras, tank tops, leggings, loungewear, hooded sweatshirts, t-shirts, bicycle shorts, socks, tights, underwear and sweaters		

Attachments	86417870#TMSN.png( bytes ) NOTICE OF OPPOSITION - Trademark Application Serial No. 86328601.pdf(83076 bytes )
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### Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/LEON HEDVAT/
Name	Leon Hedvat
Date	07/22/2015

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

In the Matter of Trademark Application Serial No 86328601  
For the mark REVERSE 360  
Published in the Official Gazette on JUNE 23, 2015

4 PILLAR DYNASTY LLC,

Opposer,

v.

SUSANA TERAN AND  
PEDRO JAVIER DIAZ RANGEL,

Applicant.

**NOTICE OF OPPOSITION**

4 PILLAR DYNASTY LLC, a New York limited liability company, located at 525 Seventh Avenue, New York, New York 10018, by Leon Hedvat, Vice-President, upon information and belief, states as follows:

The above-identified oppose believes that it will be damaged by registration of the mark shown in the above-identified application, and hereby opposes the same. The grounds for opposition are as follows:

1. Opposer has heretofore filed an application for registration of the mark REVERSE which registration was suspended by office action dated January 28, 2015 on the grounds of a prior application, to wit, the application which is being opposed herein.
2. Opposer has been using the mark REVERSE since January, 2012 and has sold and delivered over \$8,000,000 or wearing apparel bearing the REVERSE label/trademark. Opposer's REVERSE branded product has been sold and is being sold in such stores as Models, 20<sup>th</sup> Century, Winners Canada, TJ Maxx and Nordstroms, as well as etailer on line websites and the websites of the stores that have purchased Opposer's REVERSE branded wearing apparel products. An example of products bearing the brand are capris, shorts, skortz, short sleeve shirts, shorts, yoga wear, activewear wear, hoodies, all of the foregoing in mens and womens styles.
3. Opposer has searched the internet and is unable to find any product being offered for sale that bears the mark REVERSE 360.
4. Opposer has not communicated with the alleged owner of REVERSE 360 inasmuch as Opposer is unable to verify that any sales of product with the REVERSE 360

brand has been sold, although Applicant has sworn to the truth of its application alleging that sales of the Applicant's mark have been made with t-shirts, shirts, shorts, pants, sweatshirts, sweatpants, jackets, hats, bathing suits, bathing trunks, rash guards and wetsuits as early as July 2, 2014. Opposer has been unable to verify any such sales. Had such sales been discovered, Opposer would have asserted its common-law right of priority of use and would have alleged an infringement of Opposer's rights.

5. Opposer believes that it will be damaged by registration of the mark shown in the above-identified application, and that there will be confusion in the public domain in that the marks are confusingly similar, the use of the mark by Applicant is deceptive and intended to palm off on the goodwill Opposer has established through its use of REVERSE, and that if such application is granted, it will substantially dilute the value of Opposer's common-law mark REVERSE.

By /LEON HEDVAT/, Vice-President  
4 Pillar Dynasty LLC  
Opposer

Date: July 22, 2015