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

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| Proceeding | 91233046 |
| Party | Plaintiff<br>Mediderm Laboratories, LLC |
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| Submission | Motion for Summary Judgment<br><br>**Yes**, the Filer previously made its initial disclosures pursuant to Trademark Rule 2.120(a); OR the motion for summary judgment is based on claim or issue preclusion, or lack of jurisdiction.<br><br>The deadline for pretrial disclosures for the first testimony period as originally set or reset: **02/01/2018** |
| Filer's Name | Kamran Fattahi |
| Filer's email | Kamran@FattahiLaw.com |
| Signature | /Kamran Fattahi/ |
| Date | 09/05/2017 |
| Attachments | 2017-9-5-Mediderm Labs Cross Motion for Summary Judgment-MEDI DERMA-Opposition 91233046.pdf(117924 bytes ) |

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

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| MEDIDERM LABORATORIES, LLC,<br>Opposer,<br>v.<br><br>SESDERMA, S.L.,<br>Applicant. | ) | Opposition No. 91233046 (parent)<br><br>Attorney Docket No.: 11340-Mediderm |
| SESDERMA, S.L.,<br>Petitioner,<br>v.<br>MEDIDERM LABORATORIES, LLC,<br>Respondent. | ) | |

**MEDIDERM'S CROSS-MOTION FOR SUMMARY JUDGMENT**

On August 4, 2017, Sesderma, S.L. ("Sesderma"), Applicant in Opposition No. 91233046 and Petitioner in Cancellation No. 92062648, filed its motion for summary judgment on grounds of alleged priority of rights over Mediderm Laboratories, Inc. ("Mediderm"). Mediderm, Opposer in Opposition No. 91233046 and Respondent in Cancellation No. 92062648, hereby files its cross-motion for summary judgment pursuant to FRCP 56 and TBMP § 528 and submits its memorandum of points and authorities in support thereof. Separately, Mediderm is filing its opposition to Sesderma's motion for summary judgment. In support of both its opposition to MSJ and its cross-motion for summary judgment, Mediderm also submits the Declaration of Lina Twaian (Mediderm's owner and Managing Member) and the Declaration of Kamran Fattahi (Mediderm's attorney of record).

## I. DESCRIPTION OF THE RECORD

### A. Procedural History

On November 18, 2015, Sesderma instituted Cancellation No. 92062648 by filing a petition for cancellation of Mediderm's U.S. Reg. No. 4,257,206 for the MEDIDERM mark. [Cancellation

92062648, 1 TTABVUE] On February 22, 2017, Mediderm instituted Opposition No. 91233046 against Sesderma's application Serial No. 86/817,072 for the MEDI+DERMA mark, which Sesderma has pleaded in the cancellation action. [Opposition 91233046, 1 TTABVUE] The Board consolidated said cancellation and opposition actions pursuant to its Order dated April 14, 2017. [Cancellation 92062648, 20 TTABVUE. In that Order, the Board designated Opposition No. 91233046 as the "parent" case, and ordered the parties to file all submissions (with the exception of pleadings) in the parent case only. The Board set new deadlines for the consolidated cases, including a deadline of December 18, 2017 for close of discovery.

In Cancellation No. 92062648, Sesderma filed a second amended petition for cancellation on April 28, 2017, which is Sesderma's operative pleading in said cancellation action. [Cancellation 92062648, 21 TTABVUE; Opposition 91233046, 6 TTABVUE]. Mediderm filed an answer thereto on May 22, 2017. [Cancellation 92062648, 22 TTABVUE; Opposition 91233046, 7 TTABVUE]

In Opposition No. 91233046, Mediderm filed its notice of opposition on February 22, 2017. [Opposition 91233046, 1 TTABVUE]. Sesderma filed its answer on April 4, 2017. [Opposition 91233046, 4 TTABVUE]

Sesderma filed its motion for summary judgment in the consolidated proceedings on August 4, 2017. [Opposition 91233046, 8 TTABVUE] On August 7, 2017, the Board issued an Order suspending proceedings pending disposition of Sesderma's motion for summary judgment. [Opposition 91233046, 9 TTABVUE]

In addition to the above-mentioned consolidated proceedings, on April 5, 2017 Mediderm instituted Cancellation No. 92065851 by filing a petition for cancellation against Sesderma's U.S. Reg. No. 5,114,389 for the mark MEDI+DERMA BY SESDERMA (stylized) in which Mediderm has relied

on its rights in the MEDIDERM mark and registration. [Cancellation No. 92065851, 1 TTABVUE] Sesderma filed its answer on May 22, 2017, and in that answer, Sesderma has relied on its alleged rights in the MEDI+DERMA and MEDIDERMA marks. [Cancellation No. 92065851, 4 TTABVUE] Inasmuch as the parties to the consolidated proceedings and Cancellation No. 92065851 are the same and the proceedings involve common questions of law and fact, it is submitted and requested that all three proceedings should be consolidated. See FRCP 42(a); TBMP § 511; Venture Out Properties LLC v. Wynn Resorts Holdings LLC, 81 USPQ2d 1887, 1889 (TTAB 2007); 8440 LLC v. Midnight Oil Co., 59 USPQ2d 1541, 1541 n.1 (TTAB 2001).

**B. Mediderm's Requests for Admission and Sesderma's Lack of Responses Thereto**

In addition to serving requests for production of documents and interrogatories, Mediderm has served upon Sesderma the following discovery documents:

- "Respondent's [Mediderm's] First Set of Requests for Admission" Nos. 1-124 duly served November 30, 2016 by e-mail from Mediderm's attorney of record on Sesderma's attorney of record. [See Fattahi Decl. ¶ 3, Exs. A and B]

Sesderma has not responded to Mediderm's First Set of Requests for Admission, nor has Sesderma ever requested from Mediderm's counsel a consented extension or sought from the Board any extension of time for responding thereto. [Fattahi Decl. ¶ 4]

## II. ARGUMENT

The issues in this cross-motion for summary judgment are as follows:

(1) Is there a likelihood of confusion between Mediderm's "MEDIDERM" mark on the one hand and Sesderma's "MEDI+DERMA" or "MEDIDERMA" or "MEDI+DERMA BY SESDERMA" marks on the other hand?

(2) Is Sesderma legally deemed to have admitted Mediderm's First Set of Requests for Admission by Sesderma's failure to timely respond to such discovery requests?

(3) By virtue of Sesderma legally and conclusively having been deemed to have admitted Mediderm's requests for admission, is Mediderm entitled to priority of use and rights in its MEDIDERM mark over any rights Sesderma may claim to have to its "MEDI+DERMA" or "MEDIDERMA" or "MEDI+DERMA BY SESDERMA" marks?

## III. RECITATION OF FACTS

### A. Mediderm's MEDIDERM Trademark

Since at least as early as February 2, 1999 and continuing to the present, Mediderm has been continuously using the name MEDIDERM as a trademark and a trade name in interstate commerce in the United States in marketing and selling a variety of cosmetics, skin care, and hair care goods as well as for private label and contract manufacturing and retail sales services of cosmetics, skin care, and hair care goods. [Twaian Decl. ¶¶ 4-7, Exs. 1-7]

On April 21, 2012, Mediderm filed use-based Application Serial No. 85/604,617 for the mark MEDIDERM in standard characters listing various cosmetics and skin care good in International Class 3 and indicating a date of first use and first use in commerce of February 2, 1999. [Twaian Decl. ¶ 6] That application matured into U.S. Registration No. 4,257,206 [see Fattahi Decl. ¶ 5, Ex. C] -- issued December 11, 2012 and owned by Mediderm -- and more specifically lists the following goods:

Int'l Class 3 (listed date of first use and first use in commerce of February 2, 1999): After-sun milks; After-sun oils; Aromatic body care products, namely, body lotion, shower gel, cuticle cream, shampoo, conditioner, non-medicated lip balm, soap, body polish, body and foot scrub and non-medicated foot cream; Bath oils for cosmetic purposes; Beauty creams for body care; Body and beauty care cosmetics; Cleansing creams; Cleansing milk for cosmetic purposes; Cosmetic creams; Cosmetic creams for skin care; Cosmetic hand creams; Cosmetic masks; Cosmetic massage creams; Cosmetic milks; Cosmetic nourishing creams; Cosmetic oils; Cosmetic preparations for body care;

Cosmetic preparations for protecting the skin from the sun's rays; Cosmetic preparations for skin care; Cosmetic preparations for skin renewal; Cosmetic preparations, namely, skin balsams; Cosmetic products in the form of aerosols for skin care; Cosmetic products in the form of aerosols for skincare; Cosmetic skin fresheners; Cosmetic soaps; Cosmetic sun milk lotions; Cosmetic sun oils; Cosmetic sun-protecting preparations; Cosmetic sun-tanning preparations; Cosmetic sunscreen preparations; Cosmetic suntan lotions; Cosmetic suntan preparations; Cosmetic tanning preparations; Face creams and cleansers containing benzoyl peroxide for cosmetic purposes; Face creams for cosmetic use; Lotions for face and body care; Moisturizing preparations for the skin; Moisturizing solutions for the skin; Non-medicated cosmetic skin care preparations consisting of organic coconut virgin oil and coconut virgin oil; Non-medicated herbal body care products, namely, body oils, salves, and lip balms; Non-medicated lip care preparations; Non-medicated preparations all for the care of skin, hair and scalp; Non-medicated skin care creams and lotions; Non-medicated skin care preparation, namely, body mist; Non-medicated skin care preparations; Non-medicated skin care preparations, namely, creams, lotions, gels, toners, cleaners and peels; Non-medicated skin cream for general skin rash and irritation resulting from skin shingles; Non-medicated skin creams; Non-medicated sun care preparations; Seawater-based skin care preparations for skin renewal; Skin and body topical lotions, creams and oils for cosmetic use; Skin bronzer; Skin care preparation, namely, body polish; Skin care preparations, namely, body balm; Skin care preparations, namely, chemical peels for skin; Skin care preparations, namely, fruit acid peels for skin; Skin care preparations, namely, skin peels; Skin care products, namely, non-medicated skin serum; Skin clarifiers; Skin cleansers; Skin cleansing cream; Skin cleansing lotion; Skin conditioners; Skin conditioning creams for cosmetic purposes; Skin creams; Skin creams in liquid and in solid form; Skin creams in liquid and solid; Skin creams in liquid and solid form; Skin emollients; Skin fresheners; Skin gels for accelerating, enhancing or extending tans; Skin lighteners; Skin lightening creams; Skin lotion; Skin lotions; Skin masks; Skin moisturizer; Skin moisturizer masks; Skin moisturizing gel; Skin soap; Skin texturizers; Skin toners; Skin whitening creams; Skin whitening preparations; Soaps for body care; Sun care lotions; Topical skin sprays for cosmetic purposes; Wipes impregnated with a skin cleanser; Wrinkle removing skin care preparations.

Moreover, Mediderm also registered the domain name "MedidermLab.com" on February 5, 1999. [Fattahi Decl. ¶ 8, Ex. F] Soon thereafter, Mediderm went on to establish and began to publicly advertise its goods and services on its website at least as early as September 25, 2000. [Fattahi Decl. ¶9, Ex. G]

**B. Sesderma's Trademarks**

**1. Sesderma's Pending U.S. Application for MEDI+DERMA**

Sesderma is listed as the applicant in pending U.S. application Serial No. 86/817,072 for the mark MEDI+DERMA (standard characters) which was filed on November 11, 2015. [See Fattahi Decl.

¶ 6, Ex. D] In said application, which is opposed by Mediderm in Opposition No. 91233046, Sesderma has listed the following services and indicated the following date of first use and first use in commerce:

- International Class 35 *(claimed date of first use and first use in commerce of December 12, 2000)*: Manufacturing and marketing of cosmetic products, professional and dedicated medical device use.

Sesderma also claims in its pleadings that in addition to the MEDI+DERMA mark, it uses the variant MEDIDERMA mark, but Sesderma has never filed a trademark application for MEDIDERMA.

**2. Sesderma's U.S. Registration for MEDI+DERMA BY SESDERMA**

Sesderma is also listed as the owner of U.S. Reg. No. 5,114,389 for the mark MEDI+DERMA BY SESDERMA (stylized) which was issued on January 3, 2017. [see Fattahi Decl. ¶ 7, Ex. E] Said registration, which is the subject of Mediderm's petition for cancellation in Cancellation No. 92065851, resulted from Application Serial No. 87/047,625 filed by Sesderma on May 24, 2016 and lists the following services and indicates the following date of first use and first use in commerce:

- Int'l Class 35 *(claimed date of first use and first use in commerce of April 20, 2012)*: On-line wholesale and retail store services featuring cosmetics, pharmaceutical and medical preparations, dietetic food and substances, dietary supplements and medical apparatus and instruments; Wholesale and retail store services featuring cosmetics, pharmaceutical and medical preparations, dietetic food and substances, dietary supplements and medical apparatus and instruments.

Just as in its Application Serial No. 86/817,072 for the mark MEDI+DERMA (standard characters), in its Second Amended Petition for Cancellation against Mediderm's registered MEDIDERM mark, Sesderma has relied on and alleged the date of first use and first use in commerce of December 12, 2000 in connection with its MEDI+DERMA mark and the variant MEDIDERMA mark. [Opposition 91233046, 6 TTABVUE 3] In fact, Sesderma has alleged this same date of December 12, 2000 as being its date of first use and first use in commerce for its MEDI+DERMA mark and the

variant MEDIDERMA mark on three occasions in its original and in its first and second amended pleadings in Cancellation No. 92062648, the last of which was filed on April 28, 2017.

**C. Mediderm's First Set of Requests for Admission to Sesderma**

Mediderm's First Set of Requests for Admission, which were duly served on Sesderma on November 30, 2016 but have never been responded to (see Fattahi Decl. ¶¶ 3-4), included requests for admission directed to Sesderma's use of the MEDI+DERMA mark (and its variant MEDIDERMA) and the dates of first use of such marks in the United States. More specifically, Mediderm's First Set of Requests for Admission were directed to the following facts and issues (see Fattahi Decl. Ex. B):

- In Requests for Admission Nos. 5 - 24, Sesderma was requested to admit that it had not *ever used or displayed* the MEDI+DERMA mark in the sale or advertising in the U.S. of the services listed in its Application Serial No. 86/817,072.

- In Requests for Admission Nos. 25 - 44, Sesderma was requested to admit that it had not *ever rendered* the services listed in its Application Serial No. 86/817,072 under the MEDI+DERMA mark in the U.S..

- In Requests for Admission Nos. 45 - 64, Sesderma was requested to admit that *on or prior to November 11, 2015 it had not used or displayed* the MEDI+DERMA mark in the sale or advertising in the U.S. of the services listed in its Application Serial No. 86/817,072. [1]

- In Requests for Admission Nos. 65 - 84, Sesderma was requested to admit that *on or prior to November 11, 2015 it had not rendered* the services listed in its Application Serial No. 86/817,072 under the MEDI+DERMA mark in the U.S..

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[1] November 11, 2015 is the filing date of Sesderma's use-based Application Serial No. 86/817,072 for the MEDI+DERMA mark.

- In Request for Admission No. 85, Sesderma was requested to admit that *prior to April 21, 2012 it had not used in commerce* the MEDI+DERMA mark in the U.S. for *each of the services* identified in its Application Serial No. 86/817,072 for the MEDI+DERMA mark. [2]

- In Request for Admission No. 86, Sesderma was requested to admit that *prior to February 2, 1999 it had not used in commerce* the MEDI+DERMA mark in the U.S. for *any of the services* identified in its Application Serial No. 86/817,072. [3]

- In Request for Admission No. 88, Sesderma was requested to admit that *prior to February 2, 1999 it had not used in commerce* the MEDI+DERMA mark in the U.S. *in connection with any goods or services*.

- In Request for Admission No. 89, Sesderma was requested to admit that *prior to December 12, 2000 it had not used in commerce* the MEDI+DERMA mark in the U.S. for *any of the services* identified in its Application Serial No. 86/817,072.[4]

- In Request for Admission No. 90, Sesderma was requested to admit that *prior to December 12, 2000 it had not used in commerce* the MEDI+DERMA mark in the U.S. *in connection with any goods or services*.

- In Request for Admission No. 91, Sesderma was requested to admit that *it had not used*

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[2] April 21, 2012 is the filing date of Mediderm's application Serial No. 85/604,617 which resulted in its U.S. Reg. 4,257,206 for the MEDIDERM mark.

[3] February 2, 1999 is stated as the date of first use and first use in commerce of the MEDIDERM mark in Mediderm's U.S. Reg. 4,257,206 which is also verified by Mediderm's owner. [Twaian Decl. ¶¶ 4, 7, Exs. 1-7]

[4] December 12, 2000 is the alleged date of first use and first use in commerce in Sesderma's use-based Application Serial No. 86/817,072 for the MEDI+DERMA mark.

*in commerce* the MEDI+DERMA mark in the U.S. *as early as December 12, 2000 for each of the services* identified in its Application Serial No. 86/817,072.

- In Request for Admission No. 92, Sesderma was requested to admit that *it had not used in commerce* the variant MEDIDERMA mark in the U.S. *since prior to April 21, 2012 for each of the services* identified in its Application Serial No. 86/817,072.

- In Request for Admission No. 93, Sesderma was requested to admit that *prior to February 2, 1999 it had not used in commerce* the variant MEDIDERMA mark in the U.S. for *any of the services* identified in its Application Serial No. 86/817,072.

- In Request for Admission No. 95, Sesderma was requested to admit that *prior to February 2, 1999 it had not used in commerce* the variant MEDIDERMA mark in the U.S. in connection with *any good or services*.

- In Request for Admission No. 96, Sesderma was requested to admit that *prior to December 12, 2000 it had not used in commerce* the variant MEDIDERMA mark in the U.S. for *any of the services* identified in its Application Serial No. 86/817,072.

- In Request for Admission No. 97, Sesderma was requested to admit that *prior to December 12, 2000 it had not used in commerce* the variant MEDIDERMA mark in the U.S. *in connection with any good or services*.

- In Request for Admission No. 98, Sesderma was requested to admit that *it had not used in commerce* the variant MEDIDERMA mark in the U.S. *as early as December 12, 2000* for each of the services identified in its Application Serial No. 86/817,072.

- In Request for Admission No. 99, Sesderma was requested to admit that *it did not have documentary evidence to show that it had used in commerce* the MEDI+DERMA mark in the U.S. *as*

*of December 12, 2000 for each of the services* identified in its Application Serial No. 86/817,072.

- In Request for Admission No. 100, Sesderma was requested to admit that *it did not have documentary evidence to show that it had used in commerce* the MEDI+DERMA mark in the U.S. *as of December 12, 2000 for any of the services* identified in its Application Serial No. 86/817,072.

- In Request for Admission Nos. 101 and 102, Sesderma was requested to admit that *it did not have documentary evidence to show that it had used in commerce* the MEDI+DERMA mark in the U.S. *prior to 1999 and prior to 2000 for each of the services* identified in its Application Serial No. 86/817,072.

- In Request for Admission Nos. 103-119, Sesderma was requested to admit that *it did not have documentary evidence to show that it had used in commerce* the MEDI+DERMA mark in the U.S. *in the years 2000-2016 for the services* identified in its Application Serial No. 86/817,072.

## IV. ARGUMENT

### A. There Is Likelihood of Confusion Between the Parties' Marks

As indicated by Sesderma in its motion for summary judgment, the parties have alleged in their respective pleadings that there is a likelihood of confusion between their respective marks; i.e., between Mediderm's "MEDIDERM" mark on the one hand and Sesderma's "MEDI+DERMA" or "MEDIDERMA" or "MEDI+DERMA BY SESDERMA" marks on the other hand. [See ¶ 11 of Mediderm's Notice of Opposition in Opposition No. 91233046, 1 TTAB; and see ¶ 6 of Sesderma's Second Amended Petition for Cancellation in Cancellation No. 92062648, 21 TTAB] The parties' respective marks have similar commercial impressions, and their respective goods and services are also similar or related.

**B. Sesderma Is Legally Deemed to Have Conclusively Admitted All of the Facts Stated In Mediderm's First Set of Requests for Admission**

On November 30, 2016, Mediderm duly and properly served Sesderma with "Respondent's [Mediderm's] First Set of Requests for Admission" (Nos. 1-124) by e-mail from Mediderm's attorney of record to Sesderma's attorney of record. However, Sesderma completely failed to respond to Mediderm's First Set of Requests for Admission. Moreover, Sesderma did not request or obtain consent for an extension of time from Mediderm's counsel for responding to such admissions requests, nor did Sesderma seek any extension of time from the Board.

Therefore, each and every one of Mediderm's requests for admissions is deemed admitted by Sesderma and is conclusively established by operation of law. Fed. R. Civ. P. 36(a)(3); TBMP §§ 407.03(a) and 407.04; Fram Trak Industries v. Wiretracks LLC, 77 USPQ2d 2000, 2005 (TTAB 2006) (requests for admissions deemed admitted by respondent's failure to respond to petitioner's requests for admissions).

**C. Since Sesderma Is Legally Deemed to Have Admitted Mediderm's First Set of Requests for Admission, Mediderma Should Prevail On the Issue of Priority, and Sesderma's Trademark Application Is Void Ab Initio**

Included in the facts that Sesderma is legally deemed to have admitted are those establishing Mediderm's priority of trademark use and trademark rights with respect to Mediderm's MEDIDERM mark over Sesderma's MEDI+DERMA mark, the variant MEDIDERMA mark, and the MEDI+DERMA BY SESDERMA mark. Specifically, the legally deemed admissions requests establish that Sesderma did not use the MEDI+DERMA or the variant MEDIDERMA marks: on or prior to the November 11, 2015 filing date of its application; prior to the alleged first use date December 12, 2000 in Sesderma's application; on or prior to the April 21, 2012 filing date of Mediderm's appliaction; and

on or prior to the first use date of February 2, 1999 of Mediderm's mark. Therefore, Mediderm should prevail in all of the currently pending TTAB proceedings against Sesderma on the basis of likelihood of confusion and priority of rights.

In addition, Sesderma is legally deemed to have admitted that it had not used its MEDI+DERMA mark as of the time of filing of its application Serial No. 86/817,072 for that mark, and as such, said application is *void ab initio*.

## V. CONCLUSION

In view of the foregoing, Mediderm believes that it is entitled to priority of rights and there is a likelihood of confusion between its MEDIDERM mark on the one hand and Sesderma's MEDI+DERMA mark, the variant MEDIDERMA mark, and the MEDI+DERMA BY SESDERMA mark on the other hand. Furthermore, Sesderma's application Serial No. 86/817,072 for MEDI+DERMA is *void ab initio*. Therefore, Sesderma's motion for summary judgment should be denied, Mediderm's cross-motion for summary judgment should be granted, and the three currently pending TTAB proceedings should be concluded in favor of Mediderm Laboratories, LLC.

Respectfully submitted,

Dated: September 5, 2017

/Kamran Fattahi/
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Attorneys for Opposer/Respondent,
Mediderm Laboratories, LLC

**CERTIFICATE OF SERVICE**

As counsel for Mediderm Laboratories, LLC, I hereby certify that I caused a true and correct copy of the attached MEDIDERM'S CROSS-MOTION FOR SUMMARY JUDGMENT (In re Opposition No. 91233046 (parent)) to be served on this date via e-mail upon Sesderma, S.L.'s attorney of record as follows:

Sesderma, S.L.'s Attorney of Record
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Dated: September 5, 2017

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