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Filing date: **11/10/2017**

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

Proceeding	91236775
Party	Plaintiff Richemont International SA
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Date	11/10/2017
Attachments	Opposers Letter -- 11.10.17.pdf(128343 bytes)

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November 10, 2017

VIA ESTTA

Ann Linnehan Vogler, Esq.
Interlocutory Attorney
Trademark Trial and Appeal Board

Re: Richemont International SA v. USA IW INC, Opposition No. 91/236,775

Dear Ms. Vogler:

This firm represents Opposer Richemont International SA (“Opposer”) in the above-captioned proceeding. We write to you to address the false statements contained in Applicant USA IW INC’s (“Applicant”) “Motion for an Extension of Answer or Discovery or Trial Periods With Consent” (5 TTABVUE), filed on November 9, 2017 (the “Motion”).

To begin, Opposer never consented to Applicant’s Motion. In fact, Opposer has never received *any* communications from Applicant or any of its representatives to date, let alone in connection with a request for an extension of time to file an answer. In addition, Applicant’s representative identified in the Motion, Zhang Meiqing, failed to serve this Motion upon Opposer via email, despite signing a Certificate of Service stating that he served the Motion upon all parties. Applicant’s false statements in the Motion constitutes fraud upon the USPTO.

Based on the foregoing, Opposer respectfully requests that the Board enter a notice of default against the Applicant.

Respectfully submitted,



Dyan Finguerra-DuCharme

Ann Linnehan Vogler, Esq.
November 10, 2017
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Trademark Application Serial Nos. 87/417,850 and 87/417,834
Marks: IWE and IWD
Filed: April 19, 2017

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RICHEMONT INTERNATIONAL S.A., :
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 Opposer, :
 :
 -against- :
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 :
 :
 USA IW INC, :
 :
 Applicant. :
-----X

Opposition No. 91/236,775

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Letter has been served on Applicant's identified correspondent of record by mailing said copy via e-mail to the following address:

KINHALO
77 WATER STREET, 7TH & 8TH FLOORS
NEW YORK 10005
e-mail: bxv@jhlgj.com; jhlgjip@126.com

/ryan s. klarberg/
Ryan S. Klarberg

Date: November 10, 2017