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

Proceeding	91243006
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**THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Trademark Application
Serial No. 86/710,362
Mark: 24/7

DOLCE VITA INTIMATES LLC,

Opposer/Respondent,

-against-

THIRDLOVE, INC.,

Applicant/Petitioner.

Proceeding No. 91/243,006

**APPLICANT/PETITIONER'S REPLY IN SUPPORT OF ITS
MOTION FOR SUMMARY JUDGMENT**

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Applicant/Petitioner ThirdLove, Inc. (“Applicant/Petitioner” or “ThirdLove”) hereby submits this Reply in support of its Motion for Summary Judgment in its favor and against Opposer/Respondent Dolce Vita Intimates LLC (“Opposer/Respondent” or “Dolce Vita”).¹

Applicant/Petitioner seeks summary judgment on the grounds that (1) Opposer/Respondent abandoned its alleged 24/7 COMFORT mark, for which it had obtained U.S. Trademark Registration No. 3,599,633, due to nonuse and intent not to resume use during the three-year period commencing on at least January 16, 2009; and (2) Opposer/Petitioner cannot establish common law use of its asserted 24/7 COMFORT mark prior to the filing of Applicant/Petitioner’s U.S. Trademark Application Serial No. 86/710,362, and thus Opposer/Respondent has no standing to maintain its opposition in the present Proceeding and the opposition should be dismissed.

I. Opposer/Respondent Did Not Rebut Applicant/Petitioner’s *Prima Facie* Showing That the Alleged 24/7 COMFORT Mark Was Abandoned, and Opposer/Respondent’s Registration Should Be Cancelled

In its opening brief, Applicant/Petitioner demonstrated that Opposer/Respondent has produced no documents showing use or an intent to resume use of its alleged 24/7 COMFORT mark for the three-year period commencing January 16, 2009, i.e., before 2012. Brief at 11-12. In particular, Opposer/Respondent produced no purchase orders, no invoices, no communications with U.S. customers, no images showing products bearing the mark 24/7 COMFORT for sale in any U.S. retail establishment, no sales records reflecting any U.S. sales, no business plans or projections, and no advertising or promotional expenditures or plans relating to the alleged 24/7 COMFORT mark, dated prior to August 1, 2012. Klarberg Dec. ¶ 11.

¹ Opposer/Respondent’s Opposition to Applicant/Petitioner’s Motion for Summary Judgment appears to be limited to pages 2-4 of its submission. Applicant/Petitioner will submit its response to Opposer/Respondent’s cross-motion for summary judgment on its likelihood of confusion claim in accordance with the schedule set out in the Board’s Order dated October 16, 2019.

To attempt to excuse this deficiency of probative evidence in its case, Opposer/Respondent submitted a declaration of Allan Solomon, Dolce Vita's Chief Financial Officer. Mr. Solomon testified, "I could not produce any documents dated prior to 2012 because all Dolce Vita's business records were destroyed by Hurricane Sandy in 2012." Solomon Dec. ¶ 9. Mr. Solomon's testimony, however, is demonstrably false, because Opposer/Respondent's own document production shows that not all of Dolce Vita's business records were destroyed by Hurricane Sandy, which occurred beginning on October 22, 2012. *See* Reply Declaration of Ryan S. Klarberg ¶¶ 2-3. Opposer/Respondent imprecisely states that "documents relating to its sales prior to 2012 were destroyed by Hurricane Sandy" (Opp. at 3; emphasis added) to attempt to conceal the fact that it produced documents dated *prior* to the occurrence of Hurricane Sandy, namely invoices dated as early as *August 1, 2012* (Klarberg Dec. ¶ 11).² Opposer/Respondent's production of these invoices contradicts the declaration testimony of Mr. Solomon that all of Dolce Vita's business records were destroyed by Hurricane Sandy. In addition to failing to produce any documents that would demonstrate use of its alleged 24/7 COMFORT mark prior to 2012 *without any valid excuse*, Opposer/Respondent did not show it was otherwise unable to obtain any records, e.g., invoices from other sources such as its alleged customers, relating to the period of its alleged use preceding Hurricane Sandy.

Moreover, the false statement regarding Hurricane Sandy destroying all of Dolce Vita's business records in Mr. Solomon's declaration calls into question the veracity of the entire declaration. *See Karlo v. Pittsburgh Glass Works, LLC*, No. 2:10-cv-1283 (TFM), 2015 WL 3966434, at *3 (W.D. Pa. June 8, 2015) (denying motion to file declaration, the court stated, "Worse yet, Claus' declaration includes 'facts' that are demonstrably false," namely testifying that

² These invoices make no reference to "24/7 COMFORT" or "24/7".

an employee was present at a meeting before the employee was employed by the company). In light of this false statement, the Board should not consider credible Mr. Solomon's self-serving and unsupported declaration testimony that "I can, however, state with certainty that over the years since December of 2008, Dolce Vita has continuously shipped tens of thousands of bras with the 24/7 COMFORT label to its customers." Solomon Dec. ¶ 11. The probative value of Mr. Solomon's declaration testimony is further diminished and limited because the declarant admits that Opposer/Respondent cannot associate sales of its products with its alleged 24/7 COMFORT mark. *Id.* ¶ 5 ("We do not keep financial records which segregate which label is present on the label for which order. Accordingly, the labels which are shipped with each order of Dolce Vita's bras are not reflected on our invoices.").

Opposer/Respondent has produced no documents showing use or an intent to resume use of its alleged 24/7 COMFORT mark prior to 2012, and its Opposition and accompanying declaration of Mr. Solomon do not provide any probative evidence or validly excuse its failure to do so. Accordingly, Applicant/Petitioner has made a *prima facie* showing of abandonment of Opposer/Respondent's alleged mark 24/7 COMFORT based on nonuse during the three-year period commencing on at least January 16, 2009, and Opposer/Responding has provided no probative, countervailing evidence to rebut this showing. Because there is no genuine factual dispute, the Board should grant Applicant/Petitioner's Motion for Summary Judgment and cancel U.S. Trademark Registration No. 3,599,363 as abandoned for nonuse.

II. Opposer/Respondent Has No Valid Registration and No Evidence of Common Law Use of Its Alleged Mark to Support Its Opposition, Which Should Be Dismissed

In its opening brief, Applicant/Petitioner showed that Opposer/Respondent has produced no evidence to substantiate use of its purported mark 24/7 COMFORT prior to July 30, 2015, the

filing date of Applicant/Petitioner's U.S. Trademark Application Serial No. 86/710,362. Brief at 13-14. In particular, Opposer/Respondent produced no documents--purchase orders, customer invoices or any other documents--which include any reference to "24/7 COMFORT" or the term "24/7" and are dated earlier than October 18, 2017.

With its Opposition, including the declaration Mr. Solomon, Opposer/Respondent did not remedy this deficiency in its case. Opposer/Respondent still has provided no documentary evidence of use of its purported 24/7 COMFORT mark prior to July 30, 2015. As explained above, Mr. Solomon, in his declaration, did not provide a valid excuse for Opposer/Respondent's failure to retain and produce relevant documents based on the alleged loss of documents due to Hurricane Sandy, and Mr. Solomon's declaration testimony is not credible. Further, irrespective of the alleged destruction of documentary evidence by the hurricane, Mr. Solomon's declaration also makes clear that Opposer/Respondent *cannot* establish common law use of its alleged mark 24/7 COMFORT prior to 2017 because Opposer/Respondent is unable to associate sales of its products with the alleged 24/7 COMFORT mark. Solomon Dec. ¶ 5 ("We do not keep financial records which segregate which label is present on the label for which order. Accordingly, the labels which are shipped with each order of Dolce Vita's bras are not reflected on our invoices."). Thus, Opposer/Respondent's assertion that it "has continuously used the 24/7 COMFORT mark in commerce and has shipped tens of thousands of bras to its customers with the 24/7 COMFORT label during the period starting in December of 2008 to the present" (Opp. at 2) must be treated as mere speculation that cannot be substantiated. Opposer/Respondent simply has no probative evidence of any kind to establish its use of its purported 24/7 COMFORT MARK—under common law or otherwise—prior to 2017.

Applicant/Petitioner has established in the present Motion for Summary Judgment that Opposer/Petitioner's opposition to Applicant/Petitioner's application for registration of the 24/7 mark cannot be sustained and should be dismissed. Opposer/Petitioner's registration should be cancelled as abandoned due to nonuse, and Opposer/Petitioner has not established and cannot establish common law use of its purported 24/7 COMFORT mark prior to the filing date of Applicant/Petitioner's trademark application for the 24/7 mark. Lacking a supportable trademark registration or any probative evidence of common law use of its alleged 24/7 COMFORT mark, Opposer/Respondent has no standing to maintain its opposition to Applicant/Petitioner's trademark application. *See Giersch v. Scripps Networks, Inc.*, 90 U.S.P.Q.2d 1020, 1023 (T.T.A.B. 2009) (petitioner must show earlier common law use in absence of registration). Accordingly, there is no genuine factual dispute and the Board should dismiss Opposer/Respondent's opposition to U.S. Trademark Application Serial No. 86/710,362, *inter alia*, on the basis of Applicant/Petitioner's affirmative defense of lack of standing.

III. Conclusion

For all of the reasons set forth above and in its opening brief, Applicant/Petitioner respectfully requests that the Board enter summary judgment in its favor and against Opposer/Respondent. Specifically, Applicant/Petitioner requests that the Board enter an order (i) cancelling U.S. Trademark Registration No. 3,599,363; (ii) dismissing Opposer/Respondent's opposition in the present Proceeding No. 91/243,006 with prejudice; and (iii) allowing U.S. Trademark Application Serial No. 86/710,362 for the mark 24/7 to proceed to registration.

Dated: October 28, 2019

PRYOR CASHMAN LLP

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Applicant/Petitioner's Reply In Support of Its Motion for Summary Judgment and the Reply Declaration of Ryan S. Klarberg have been served upon Opposer/Respondent's counsel by email on October 28, 2019 at the following e-mail addresses:

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Proceeding No. 91/243,006

**REPLY DECLARATION OF RYAN S. KLARBERG IN FURTHER SUPPORT OF
APPLICANT/PETITIONER'S MOTION FOR SUMMARY JUDGMENT**

I, RYAN S. KLARBERG, hereby declare as follows:

1. I am an attorney with the law firm of Pryor Cashman LLP, counsel for Applicant/Petitioner ThirdLove, Inc. ("ThirdLove") and have personal knowledge of all of the facts and circumstances set forth herein. I submit this reply declaration in further support of Applicant/Petitioner ThirdLove's Motion for Summary Judgment in its favor and against Opposer/Respondent Dolce Vita Intimates LLC ("Dolce Vita").

2. A true and correct printout of an article from CNN.com entitled, "Hurricane Sandy Fast Facts," printed October 25, 2019 (the "Article"), is attached hereto as Exhibit A.

3. The Article provides a timeline of events involving Hurricane Sandy. The timeline begins with the date of October 22, 2012 ("Sandy develops into a tropical storm in the Caribbean Sea."). To the best of my knowledge, this is an accurate timeline of events involving Hurricane Sandy.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
October 28, 2019



RYAN S. KLARBERG

EXHIBIT A

Hurricane Sandy Fast Facts

CNN Library

Updated 5:13 PM ET, Wed October 2, 2019



David Mccue (C), looks for pieces of his beach house that was completely demolished by Superstorm Sandy on November 25, 2012, in Seaside Heights, New Jersey.

(CNN) — Here's a look at Hurricane Sandy, which was also called "Superstorm Sandy."

According to the Federal Emergency Management Agency (FEMA), Hurricane Sandy affected 24 states and all of the eastern seaboard. Causing [an estimated \\$70.2 billion in damages](#), it was the fourth-costliest US storm behind Hurricane Katrina in 2005 and hurricanes Harvey and Maria in 2017, [according to the National Oceanic and Atmospheric Administration](#).

October 22-29, 2012 - Hurricane Sandy, as a [hurricane](#) and a post-tropical cyclone, is directly responsible for at least 147 deaths in the Northeast United States, Canada and the Caribbean, according to the National Hurricane Center. The [death toll](#) in the United States directly attributed to Sandy includes 48 in New York, 12 in New Jersey, 5 five in Connecticut, two in Pennsylvania and five in other states. In the Caribbean, Haiti (54 deaths) and Cuba (11 deaths) are the countries affected the most, and there is one death in Canada.

Records:

October 29, 2012 - [Hurricane](#)-hunter aircraft measure Sandy's central pressure at 940 millibars -- 27.76 inches - the lowest barometric reading ever recorded for an Atlantic storm to make landfall north of Cape Hatteras, North Carolina. The previous record holder was the 1938 "Long Island Express" Hurricane, which dropped as low as 946 millibars.

October 29, 2012 - The surge level at Battery Park in New York tops 13.88 feet at 9:24 p.m., surpassing the old record of 10.02 feet, set by Hurricane Donna in 1960.

October 29, 2012 - New York Harbor's surf reaches a record level when a buoy measures a 32.5-foot wave. That wave is more than seven feet taller than a 25-foot wave churned up by Hurricane Irene in 2011.

Timeline:

October 22, 2012 - Sandy develops into a tropical storm in the Caribbean Sea.

October 24, 2012 - Sandy develops into a Category 1 hurricane.

October 24, 2012 - Hurricane Sandy makes landfall near Kingston, Jamaica, with winds of 80 mph.

October 25, 2012 - Hurricane Sandy makes landfall in southeastern [Cuba](#) as a Category 2 hurricane with 105 mph winds.

October 25, 2012 - Hurricane Sandy makes landfall in Haiti and the Bahamas.

October 27, 2012

- The National Weather Service downgrades Sandy to a tropical storm.
- Sandy strengthens to a Category 1 hurricane with sustained winds of 75 mph.
- New Jersey, Connecticut and Massachusetts declare states of emergency.
- [New Jersey Governor Chris Christie](#) orders residents living in the barrier islands from Sandy Hook South to Cape May to evacuate. He orders the casinos to evacuate no later than 4 p.m. on Sunday.
- Amtrak cancels several of its runs that originate or end in East Coast stations.

October 28, 2012

- [New York's Metropolitan Transportation Authority](#) suspends subway and commuter rail services at 7 p.m. Bus services are suspended at 9 p.m.
- Governor Andrew Cuomo directs Army and Air [National Guard](#) members to mobilize.
- New York City Mayor Michael Bloomberg orders evacuations in low-lying areas and public school closures.
- Rhode Island declares a state of emergency.
- [President Barack Obama](#) declares a state of emergency in Connecticut, Washington, Delaware, Maryland, Massachusetts, New York and Rhode Island.
- The Broadway League cancels all Broadway performances for Sunday and Monday nights.
- The Port Authority of New York and New Jersey suspends all its train service at midnight until further notice.
- Airlines cancel flights.
- Southeastern Pennsylvania Transportation Authority suspends all services.

October 29, 2012

- Approaches land as a Category 2 storm.
- The New York Stock Exchange suspends all trading operations.
- Hurricane force winds extend 175 miles out from Sandy's eye, making it much larger than most storms of its type.
- US Federal offices in Washington area close to the public.
- [United Nations](#) headquarters in Manhattan closes.
- [Metro in Washington](#) closes its transit service.
- Close to 11 million commuters are without service.
- West Virginia Governor Earl Ray Tomblin declares a state of emergency due to snow and rain from Hurricane Sandy.
- 6,700 National Guard are on active duty or in the process of activating to support the governors of the states affected by Hurricane Sandy.
- Hurricane Sandy weakens to a post-tropical cyclone in the evening before making landfall along the coast of southern New Jersey.
- At least 110 homes burn to the ground in the Breezy Point neighborhood of Queens, New York. The cause of the blaze is not immediately released.
- Three reactors experience trips, or shutdowns, during the storm, according to a Nuclear Regulatory Commission statement.

October 30, 2012

- The New York Stock Exchange remains closed for the second consecutive day, the first time this has happened because of weather since 1888.
- Kennedy Airport reopens for some airlines to land planes beginning at 10 p.m.
- New York's LaGuardia and Newark Liberty International Airport remain closed due to storm damage.
- 7.9 million businesses and households are without electric power in 15 states and the District of Columbia.
- 9,000 people in 13 states spend the night in 171 Red Cross operated-shelters
- The Red Cross reports that 300 blood drives are canceled due to the storm.
- The majority of the 1,400 Guardsmen in Massachusetts activated for Hurricane Sandy began the process of returning to their home stations.
- Helicopter performs rooftop rescues of five adults and one child trapped in houses on Staten Island due to rising waters.
- National Guard arrives in Hoboken, New Jersey.

October 31, 2012

- The New York Stock Exchange reopens after being shut down for two days. Bloomberg rings the opening bell.
- John F. Kennedy and Newark Liberty International Airports reopen at 7:00 a.m. with limited service.
- Hoboken Hudson River ferry service restarts at 7 a.m. from New Jersey to the World Financial Center.
- Federal agencies in Washington reopen.
- Storm-related outages are down to just over 6.3 million.
- President Obama and New Jersey Governor Christie tour the storm-damaged area near Atlantic City.
- New York's Bellevue Hospital, one of the nation's largest hospitals, begins evacuating the more than 725 patients after an investigation reveals that the damage sustained is extensive.

November 1, 2012

- 4.8 million customers remain without power in 15 states and the District of Columbia.
- LaGuardia Airport reopens with limited service.
- Manhattan public schools remain closed.
- Theaters on Broadway reopen.

November 2, 2012

- Areas hit by Sandy are still experiencing [gas](#) shortage problems due to gas stations without electrical power.
- According to the US Chamber of Commerce Business Civil Leadership center, businesses have contributed more than \$33 million in donations.
- [The New York City Marathon](#), scheduled for November 4, is canceled.
- 3.3 million customers remain without power.
- Con Edison restores power to approximately 460,000 out of 910,000 customers who were impacted.
- The US Energy Information Administration reports that approximately 67% of gas stations in metropolitan New York do not have gas for sale.

November 3, 2012

- Gas rationing begins in 12 New Jersey counties.
- Con Edison announces it has restored electricity to more than 645,000 customers, or approximately 70% of all those who lost power.
- New York Governor Cuomo announces the Metropolitan Transportation Authority has restored 80% of the New York subway system including subway service between Brooklyn and Manhattan.
- The US Energy Information Administration estimates that 38% of stations in metropolitan New York do not have gasoline for sale.

November 4, 2012

- New York City Public Schools announce via their official feed that schools will begin to open on November 5. More than 80 of the schools in the district have

- The White House, which has already approved more than \$137 million in direct assistance for those in need, says that about 164,000 Connecticut, New York and New Jersey residents have applied for federal assistance from FEMA.
- The New York City Board of Elections announces the decision to temporarily relocate or combine some polling locations across the five boroughs because of damage from Superstorm Sandy.

November 6, 2012

- Residents in some of the affected areas are allowed to vote in the presidential election via email or fax, and some states allow voters to vote at any polling station.

November 7, 2012

- More than 600,000 people are still without power.
- Governor Cuomo fires his chief of emergency management after the employee allegedly used government workers to clear a tree from his driveway in Long Island during the hurricane.
- The Red Cross announces it has raised nearly \$103 million in donations for Sandy victims.
- More than 352,000 people have registered for assistance and more than \$403 million have been approved for FEMA assistance.
- Over 71,000 applicants are eligible for more than \$385 million in housing assistance.
- A nor'easter, a strong low pressure system with powerful northeasterly winds coming from the ocean ahead of a storm, hits the areas already damaged by Sandy.

November 9, 2012

- Gas rationing begins in New York City and Nassau and Suffolk counties on Long Island.

November 28, 2012

- New Jersey Governor Christie estimates damage from Sandy related storms to be about \$36.8 billion.
- \$29.4 billion in repair and restoration
- \$7.4 billion in supplemental mitigation protection and prevention coverage
- Governor Christie appoints Marc Frenz, a former Executive Assistant Attorney General, to manage Sandy's storm recovery within the Governor's office.
- Bloomberg estimates the total public and private losses to New York City to be \$19 billion.
- Approximately \$15 billion is for the losses not covered by private insurance
- \$3.8 billion will be compensated by insured private losses
- Governor Cuomo says Sandy has cost New York state \$41.9 billion.
- \$32.8 billion in repair and restoration costs
- \$9.1 billion in mitigation and prevention costs
- At one point, close to three million people in New Jersey were without power.

January 11, 2013 - The Metropolitan Transportation Authority (MTA) estimates that Sandy caused \$5 billion dollars in losses: \$4.75 billion in infrastructure damage and a further \$246 million in lost revenue and increased operating costs.

February 12, 2013

- According to a report released by the National Hurricane Center, Sandy is expected to rank as the second-costliest tropical cyclone on record, after [Hurricane Katrina of 2005](#), and will probably be the sixth-costliest cyclone when adjusting for inflation, population and wealth normalization factors.
- The report indicates [Sandy is responsible for the "greatest number of US direct fatalities related to a tropical cyclone outside of the southern states since Hurricane Agnes of 1972."](#)
- New York Governor Cuomo announces that his administration has sent letters to various banks and mortgage service providers asking them to "use maximum discretion and effort to speed the release of funds." According to Cuomo, banks are holding more than \$200 million in insurance payments meant for Sandy victims.

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