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

Proceeding	91255498
Party	Defendant El Pollo Regio IP, LLC
Correspondence Address	JERRY C HARRIS JR WICK PHILLIPS GOULD & MARTIN LLP 3131 MCKINNEY AVENUE , SUITE 100 DALLAS, TX 75204 UNITED STATES Primary Email: jerry.harris@wickphillips.com Secondary Email(s): wptrademarks@wickphillips.com 214-692-6200
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Date	07/10/2020
Attachments	2020_07_10_Response_to_Motion_to_Strike.pdf(372296 bytes)

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

In the Matter of U.S. Application Serial No. 88/336,253 for the mark POLLO REGIO owned by El Pollo Regio IP, LLC.

Sony Pictures Television Inc.	§	
	§	Opposition No. 91255498
Opposer,	§	
	§	
v.	§	Serial No. 88/336,253
	§	Mark: POLLO REGIO
El Pollo Regio IP, LLC	§	
	§	
Applicant.	§	

APPLICANT’S RESPONSE AND OPPOSITION TO OPPOSER’S MOTION TO STRIKE AFFIRMATIVE DEFENSES

Applicant El Pollo Regio IP, LLC ("Applicant") hereby responds to Opposer Sony Pictures Television, Inc.’s (“Opposer”) Motion to Strike the Fourth, Fifth and Sixth Affirmative Defenses in the Answer of Applicant. As a preliminary matter, Opposer’s motion is unclear as to which affirmative defenses it seeks to strike. While the motion requests that Applicant’s fourth, fifth and sixth affirmative defenses be stricken, the memorandum in support of same actually references Applicant’s first, second and third affirmative defenses instead. For the purpose of this Response, Applicant proceeds on the understanding that Opposer is actually referring to Applicant’s first, second and third affirmative defenses. In support of same, Applicant states that sufficient facts exist in support of its first, second and third affirmative defenses or, at a minimum, have a bearing on the claims of the case or create a fact issue regarding same, and as a result Opposer’s Motion to Strike the affirmative defenses should be denied. Specifically, this opposition proceeding and Applicant’s current trademark application are again not the first time Opposer has been made aware of Applicant’s use of the mark in question.

PROCEDURAL HISTORY

Applicant filed an application registration of Applicant's POLLO REGIO Design Mark (U.S. Ser. No. 88/336,253) ("Mark") on March 12, 2019. Applicant's Mark was published for opposition on January 7, 2020. Opposer did file a request for extension of time to oppose on January 30, 2020, and it received an extension up to and including May 6, 2020. Thereafter, Opposer filed its Notice of Opposition on April 27, 2020. 1 TTABVUE. Opposer based its claim on a likelihood of confusion between the Mark and Opposer's LOS POLLOS HERMANOS Design Mark, while also alleging a likelihood of dilution by blurring and a false association under section 2(a) of the Lanham Act. Id.

On June 5, 2020, Applicant filed its Answer. 4 TTABVUE. On June 22, 2020, Opposer filed its Motion to Strike Applicant's fourth, fifth and sixth affirmative defenses, likely mis-identifying Applicant's first, second and third affirmative defenses of waiver, acquiescence and laches. 5 TTABVUE. Applicant now files this Response and Opposition to Opposer's Motion to Strike.

Prior to commencement of these opposition proceedings, Applicant also sought registration of the Mark in Mexico. On October 10, 2018, Applicant filed Proceeding Nos. 2112923 and 2112925 with the Instituto Mexicano de la Propiedad Industrial for the Mark it now seeks to register in the United States, true and correct copies of each Mexican application are attached hereto as Exhibits A and B, respectively. Critically, Opposer was fully aware of Applicant's claims to the instant Mark at least as early as November 15, 2018, a full year prior to the Notice of Opposition filed in the United States, based on Opposer's attempts to persuade Applicant to withdraw its Mexican applications for the Mark. Both Mexican Proceeding No. 2112923 and No. 2112925 explicitly indicate that each of those applications claim priority to U.S. App. No.

88/336,253. See Exhibits A & B at 3.

MEMORANDUM IN SUPPORT OF APPLICANT'S RESPONSE

I. Motions to Strike Affirmative Defenses Are Not Favored.

Pursuant to Fed. R. Civ. P. 12(f), a defense may be stricken from a pleading where such defense is insufficient, impermissible, redundant, immaterial, or includes impertinent or scandalous material. Fed.R.Civ.P. 12(f); Trademark Rule 2.16(a); TBMP § 506.

However, while Opposer cites to the first section of TBMP § 506.01 in its Motion to Strike, it ignores the majority of the rule, which continues as follows:

Motions to strike are not favored, and matter usually will not be stricken unless it clearly has no bearing upon the issues in the case. . . The primary purpose of pleadings, under the Federal Rules of Civil Procedure, is to give fair notice of the claims or defenses asserted. . . Thus, the Board, in its discretion, may decline to strike even objectionable pleadings where their inclusion will not prejudice the adverse party, but rather will provide fuller notice of the basis for a claim or defense. . . A defense will not be stricken as insufficient if the insufficiency is not clearly apparent, or if it raises factual issues that should be determined on the merits.

TBMP § 506.01.

See also *Ohio State Univ. v. Ohio Univ.*, 51 USPQ2d 1289, 1293 (TTAB 1999) and *Harsco Corp. v. Elec. Sci., Inc.*, 9 USPQ2d 1570, 1571 (TTAB 1988), holding that motions to strike “are not favored, and matter will not be stricken *unless it clearly has no bearing upon the issues in the case.*” (emphasis added).

Here, Opposer had actual knowledge of Applicant’s claims to the allegedly similar Mark for nearly a year and a half before filing any formal opposition to its use. Opposer was already aware of Applicant’s claim to the Mark in 2018, e.g., U.S. App. No. 88/336,253, and there can be no dispute as to the length of time that passed between Opposer’s attempts to persuade Applicant to withdraw its Mexican applications based on U.S. App. No. 88/336,253, and when it eventually filed a formal opposition in these proceedings. At a minimum, the existence of this greater delay

creates a fact issue as described in TBMP § 506.01, and has a bearing on whether or not Opposer acted with proper due diligence. As such, it would be premature and improper for the Board to summarily strike Applicant's affirmative defenses before making a determination on the merits.

2. Opposer Has Not Met Its Burden to Strike Applicant's Affirmative Defenses.

Courts in trademark litigation have established several elements a movant must prove in order to strike affirmative defenses:

Three prerequisites must be satisfied before a motion to strike an affirmative defense will be granted. First, a motion to strike an affirmative defense "will not be granted 'unless it appears to a certainty that plaintiffs would succeed despite any state of the facts which could be proved in support of the defense.'" *Salcer*, 744 F.2d at 939 (quoting *Durham Indus. v. North River Ins. Co.*, 482 F.Supp. 910, 913 (S.D.N.Y.1979)); see also *Morse/Diesel Inc. v. Fidelity & Deposit Co.*, 763 F.Supp. 28, 34 (S.D.N.Y.1991). To this end, defendant's pleadings must be construed liberally. See *Bennett v. Spoor Behrins Campbell & Young, Inc.*, 124 F.R.D. 562, 564 (S.D.N.Y.1989); *Oliner v. McBride's Indus., Inc.*, 106 F.R.D. 14, 17 (S.D.N.Y.1985).

. . . Second, "even when the facts are not disputed, ... a motion to strike for insufficiency was never intended to furnish an opportunity for the determination of disputed and substantial questions of law[,] ... particularly [when] there has been no significant discovery." *Salcer*, 744 F.2d at 939 (citations and internal quotation marks omitted).

Third, plaintiff must show that it is prejudiced by the inclusion of the defense. See *Oliner*, 106 F.R.D. at 17; see also 5A Charles Alan Wright & Arthur R. Miller, *Federal Practice & Procedure* § 1381, at 672 (2d ed.1990). Increased time and expense of trial may constitute sufficient prejudice to warrant granting plaintiff's Rule 12(f) motion. When "the defense is insufficient as a matter of law, the defense should be stricken to eliminate the delay and unnecessary expense from litigating the invalid claim." *FDIC v. Eckert Seamans Cherin & Mellott*, 754 F.Supp. 22, 23 (E.D.N.Y.1990); see also *Metric Hosiery Co. v. Spartans Indus., Inc.*, 50 F.R.D. 50, 51–52 (S.D.N.Y.1970).

Estee Lauder, Inc. v. Fragrance Counter, Inc., 189 F.R.D. 269, 271–72 (S.D.N.Y. 1999)

As for the first element, the documentation attached establishes a different timeline than alleged in Opposer's Motion to Strike, and shows it had actual knowledge of Applicant's claims to the Mark a year in advance of the Notice of Opposition filed in this proceeding. This again creates a fact issue as to what knowledge Opposer actually had about Applicant's claims to the

Mark, and by extension whether or not Applicant would succeed with its defenses of laches, waiver and acquiescence.

As for the second element, no discovery has been conducted at all in this matter, and the opposition has only been on file since April 27, 2020, for less than three months. What Opposer knew and when must be fleshed out through the discovery process, which has not yet been able to occur. Indeed, Opposer's Motion to Strike has already stayed these proceedings, precluding the ability to send discovery.

As for the third element, Opposer has failed to meet its burden by providing any explanation showing how it will realistically be burdened by the inclusion of these affirmative defenses, beyond engaging in discovery, which will occur anyway as in any opposition proceeding. Because Opposer has not included any allegation as to how it would be prejudiced beyond those events that occur during normal trademark opposition proceedings, its Motion to Strike must be denied.

3. Information Currently Available Concerning Opposer's Delay Supports Applicant's Affirmative Defenses.

Opposer seeks to characterize its delay in responding to a period of only a several months, and between the time that the Notice of Opposition was issued and the time that Opposer filed its opposition. However, as described above, the facts available even at this early stage show that Opposer had actual knowledge of Applicant's claims to the Mark well before the Notice of Opposition issued. In fact, Opposer sought to persuade Applicant to forgo any attempts to use the Mark in Mexico as far back as November 2018, but waited until April 2020 to file the instant opposition.

As for Applicant's affirmative defense of laches specifically, the evidence attached

demonstrates the true timeline at issue in this case. Courts in trademark litigation have established the elements of a laches defense as follows:

The doctrine of laches bars relief to those who delay the assertion of their claims for an unreasonable time. Laches is founded on the notion that equity aids the vigilant and not those who slumber on their rights.” *NAACP v. NAACP Legal Defense & Educational Fund, Inc.*, 753 F.2d 131, 137 (D.C.Cir.1985). Typically, a laches defense arises in trademark matters when a party defends against a trademark infringement claim on the theory that the original trademark holder fumbled away its trademark rights through inattention. In such typical circumstances, the common law allows for a laches defense only if the defendant meets “three affirmative requirements: (1) a substantial delay by a plaintiff prior to filing suit; (2) a plaintiff’s awareness that the disputed trademark was being infringed; and (3) a reliance interest resulting from the defendant’s continued development of good-will during this period of delay.” *Id.*

Pro-Football, Inc. v. Harjo, 284 F. Supp. 2d 96, 136 (D.D.C. 2003)

Here, Applicant has attached evidence in support of at least two elements of what it must prove to establish its laches defense. Specifically, it has shown that Opposer had actual awareness that Opposer’s alleged mark was allegedly likely to be confused with Applicant’s Mark, and for a more substantial period of time than argued in Opposer’s Motion to Strike. The existence of these facts again create a fact issue requiring a determination of the merits of Applicant’s defense under TBMP § 506, but also support Applicant’s laches defense.

Additionally, Opposer cites in its motion to a similar opposition proceeding between the parties (Opp. No. 91254690), and claims that the facts and case law do not support Applicant’s positions in responding to its motion to strike in that case. However, because the Lanham Act does not include a limitations period, courts use the doctrine of laches to address the inequities created by a trademark owner who, despite having a colorable infringement claim, allows a competitor to develop its products around the mark and expand its business, only then to lower the litigation boom.¹ This is the circumstance here. Opposer was well aware of Applicant’s use of the mark in

¹ See *What-A-Burger Of Virginia, Inc. v. Whataburger, Inc. Of Corpus Christi, Texas*, 357 F.3d 441, 449 (4th Cir. 2004)

question, but nonetheless chose to forego any formal legal action until now, despite awareness of Applicant's use of the allegedly infringing mark. Courts typically analyze delays on a case by case basis to assess when owners of marks first became aware of the use of a mark to assess laches defenses, and do not limit them as described in Opposer's motion. For example, case law has held that delay is again measured beginning when the plaintiff "knew or should have known" of the alleged infringement, and that the period of delay ends once the trademark owner objects to the defendant's use and the defendant receives notice of the objection.² Because each situation is different, and there is no black-line limit as to when these defenses may be asserted, Sony's delay and actions warrant such defenses in this case.

As for the affirmative defense of waiver, Opposer claims that Applicant cannot allege silence or inaction on the part of Opposer, and that Opposer promptly and timely requested an extension of time to oppose, attempted to negotiate a resolution during the extension period and filed its opposition before the expiration of the deadline set by the Board. However, as described above, the facts show that Opposer was again well aware of Applicant's claims to the Mark as far back as 2018, yet it still did nothing. These facts also support Applicant's affirmative defense that Opposer waived its claims through its own inaction following discovery of Applicant's use of the Mark, or at least create a fact issue regarding Opposer's failure to properly address the alleged likelihood of confusion in 2018.

Additionally, the facts support Applicant's affirmative defense of acquiescence. At a minimum, Opposer's delayed filing of this opposition proceeding until April 2020 creates a fact issue as to whether or not Opposer impliedly made a representation to Applicant that it would not challenge Applicant's claim to the Mark, as it had questioned Applicant's claims to the Mark in

² See *RE/MAX Int'l, Inc. v. Trendsetter Realty, LLC*, 655 F. Supp. 2d 679, 709 (S.D. Tex. 2009)

Mexico in 2018.

CONCLUSION

For the foregoing reasons, Opposer's Motion to Strike Applicant's fourth, fifth and sixth affirmative defenses should be denied.

Respectfully Submitted,

/Jerry C. Harris, Jr./

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Attorneys for Applicant
EL POLLO REGIO IP, LLC

Electronically Filed Via ESTTA: July 10, 2020.

CERTIFICATE OF TRANSMISSION UNDER TBMP 110

I HEREBY CERTIFY that on this 10th day of July, 2020, a true and correct copy of this document, *Applicant's Response and Opposition to Opposer's Motion to Strike Affirmative Defenses*, in Opposition No. 91255498 is being filed electronically through <http://esta.uspto.gov> via the Trademark Trial and Appeal Board Electronic Filing System.

/Jerry C. Harris, Jr./

Jerry C. Harris, Jr.

CERTIFICATE OF SERVICE UNDER TBMP 113

I HEREBY CERTIFY that on this 10th day of July, 2020, a true and correct copy of the foregoing *Applicant's Response and Opposition to Opposer's Motion to Strike Affirmative Defenses*, in Opposition No. 91255498 has been served on counsel for Opposer, Sony Pictures Television Inc., by emailing said copy to:

Richard S. Mandel, Esq.
COWAN LIEBOWITZ & LATMAN, P.C.
trademark@cll.com
rsm@cll.com
jyc@cll.com

/Jerry C. Harris, Jr./

Jerry C. Harris, Jr.

EXHIBIT A

Instituto Mexicano de la Propiedad Industrial



DIRECCIÓN DIVISIONAL DE MARCAS.
 SUBDIRECCIÓN DIVISIONAL DE PROCESAMIENTO ADMINISTRATIVO DE MARCAS.
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EXPEDIENTE: 2112923
 FOLIO DE RECEPCIÓN: 249280
 FECHA Y HORA DE LA RECEPCIÓN DE LA SOLICITUD: 10/10/2018 12:26:02

SOLICITUD DE:
REGISTRO DE MARCA
SOLICITANTE(S) O REPRESENTANTE LEGAL:
CYNTHIA MADRIGAL DOMINGUEZ
DOCUMENTOS ANEXOS:
DISEÑO 77.gif 13.95 kB
COMPROBANTE DE PAGO 10038320106_Pago.pdf 25.73 kB

Los documentos adjuntos están sujetos al estudio correspondiente que el Instituto realice de conformidad con la Ley de la Propiedad Industrial y su Reglamento.

EL FIRMANTE MANIFESTÓ:
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 Declaró bajo protesta de decir verdad que cuenta con un domicilio en la República Mexicana.
 Declaró bajo protesta de decir verdad que los documentos anexos a la solicitud son originales o copia debidamente certificada.

CON LA FECHA Y HORA REFERIDA SE HA RECIBIDO SU SOLICITUD CON LOS DATOS SEÑALADOS DE LA QUE SE ACUSA RECIBO.

FIRMA DE ACUSE:		
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Fecha de solicitud del trámite			
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DD		MM	AAAA

Datos generales del o de los solicitante(s)

Personas físicas	Personas morales
CURP (opcional):	RFC (opcional):
Nombre(s):	Denominación o razón social: EL POLLO REGIO IP, LLC
Primer apellido:	
Segundo apellido:	
Nacionalidad:	Nacionalidad: ESTADOS UNIDOS DE AMERICA
Teléfono (lada, número, extensión):	Teléfono (lada, número, extensión):
Correo electrónico:	Correo electrónico:
<input type="radio"/> Continúa en anexo	<input type="radio"/> Continúa en anexo

Domicilio del solicitante

Código postal: 75050	
Calle: 108TH STREET GRAND PRAIRE <small>(Por ejemplo: Avenida Insurgentes Sur, Boulevard Ávila Camacho, Calzada, Corredor, etc.)</small>	
Número exterior: 1185	Número interior:
Colonia: <small>(Por ejemplo: Ampliación Juárez, Residencial Hidalgo, Fraccionamiento, Sección, etc.)</small>	
Municipio o demarcación territorial:	Localidad:
Entidad federativa: TEXAS	Entre calles (opcional):
País: ESTADOS UNIDOS DE AMERICA	Calle posterior (opcional):

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Código postal: 03900	
Calle: AV. INSURGENTES SUR <small>(Por ejemplo: Avenida Insurgentes Sur, Boulevard Ávila Camacho, Calzada, Corredor, etc.)</small>	
Número exterior: 1647	Número interior: 15-02
Colonia: SAN JOSE INSURGENTES <small>(Por ejemplo: Ampliación Juárez, Residencial Hidalgo, Fraccionamiento, Sección, etc.)</small>	
Municipio o demarcación territorial: BENITO JUAREZ	Localidad:
Entidad federativa: CIUDAD DE MEXICO	Entre calles (opcional):
	Calle posterior (opcional):

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Datos del signo distintivo

Signo que solicita:

Marcar con una X sólo una casilla

Publicación de Nombre Comercial

Registro de Marca

Registro de Aviso Comercial

Registro de Marca Colectiva

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Clase:
25

Productos o Servicios, en el caso de Marca o Aviso Comercial/Giro preponderante, en el caso de Nombre Comercial: CAMISAS CAMISETAS; CAMISETAS GRÁFICAS; CAMISAS DE MANGA CORTA.

Continúa en anexo

Denominación:

(Sólo en caso de marcas que, además de un elemento figurativo, se integren por palabras, letras o números)

POLLO REGIO

Representación del signo:



Elementos sobre los cuales No se solicita protección:

Continúa en anexo

Ubicación del establecimiento

Código postal:

Calle:

(Por ejemplo: Avenida Insurgentes Sur, Boulevard Ávila Camacho, Calzada, Corredor, etc.)

Número exterior:

Número interior:

Colonia:

(Por ejemplo: Ampliación Juárez, Residencial Hidalgo, Fraccionamiento, Sección, etc.)

Localidad:

Municipio o demarcación territorial:

Entidad federativa:

Entre calles (opcional):

Calle posterior (opcional):

País:

Prioridad reclamada:

(Sólo en caso de Marca o Aviso Comercial presentado en el extranjero)

País (oficina) de origen:

ESTADOS UNIDOS DE AMERICA

Número:

88112977

Fecha de presentación:

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11 / 09 / 2018

Manifiesto, bajo protesta de decir verdad, que los datos asentados en esta solicitud son ciertos y que, en caso de actuar como mandatario, cuento con facultades suficientes para llevar a cabo el presente trámite.
Asimismo, me doy por enterado del tratamiento que se les dará a los datos personales contenidos en la presente solicitud.

Nombre y firma del solicitante o de su representante

CYNTHIA MADRIGAL DOMINGUEZ

HXW9YLBIZ2eAPry/9wllbDcWboNUNNg5um3lfghH4bLiAdf9SNnyLM2LbAi6s92R8IXMJL7cwLRk0KkqJlv0uF1+LTckEiDv+h19Y+HjZAnOOBi7hmDBNc1K/2eowDvYE0BksbMwTc+j3wBsqY4Vzolz3Q4QOfi0rJMMRHU6ldfYpj0FFLWh1WoivSqZAQYsncY8ZYlg9LSztlco/WHP8FMnH+883Sd+32FvJtSkw5xp2YvA

EXHIBIT B

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EXPEDIENTE: 2112925
 FOLIO DE RECEPCIÓN: 249283
 FECHA Y HORA DE LA RECEPCIÓN DE LA SOLICITUD: 10/10/2018 12:28:49

SOLICITUD DE:

REGISTRO DE MARCA

SOLICITANTE(S) O REPRESENTANTE LEGAL:

CYNTHIA MADRIGAL DOMINGUEZ

DOCUMENTOS ANEXOS:

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EL FIRMANTE MANIFESTÓ:

Que reconoce como propia y auténtica la información contenida en la solicitud enviada a través de este medio, asumiendo la responsabilidad por el uso de su nombre de usuario y contraseña y FIEL por persona distinta a la autorizada, por lo que de ocurrir ese supuesto se les atribuirá la autoría de la información que se envíe a través del PASE.

Declaró bajo protesta de decir verdad que cuenta con un domicilio en la República Mexicana.

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Datos generales del o de los solicitante(s)

Personas físicas	Personas morales
CURP (opcional):	RFC (opcional):
Nombre(s):	Denominación o razón social: EL POLLO REGIO IP, LLC
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Segundo apellido:	
Nacionalidad:	Nacionalidad: ESTADOS UNIDOS DE AMERICA
Teléfono (lada, número, extensión):	Teléfono (lada, número, extensión):
Correo electrónico:	Correo electrónico:
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Domicilio del solicitante

Código postal: 75050	
Calle: 108TH STREET GRAND PRAIRE <small>(Por ejemplo: Avenida Insurgentes Sur, Boulevard Ávila Camacho, Calzada, Corredor, etc.)</small>	
Número exterior: 1185	Número interior:
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Número exterior: 1647	Número interior: 15-02
Colonia: SAN JOSE INSURGENTES <small>(Por ejemplo: Ampliación Juárez, Residencial Hidalgo, Fraccionamiento, Sección, etc.)</small>	
Municipio o demarcación territorial: BENITO JUAREZ	Localidad:
Entidad federativa: CIUDAD DE MEXICO	Entre calles (opcional):
	Calle posterior (opcional):

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Datos del signo distintivo

Signo que solicita:

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Publicación de Nombre Comercial

Registro de Marca

Registro de Aviso Comercial

Registro de Marca Colectiva

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MM

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No se ha usado

Clase:

43

Productos o Servicios, en el caso de Marca o Aviso Comercial/Giro preponderante, en el caso de Nombre Comercial: SERVICIOS DE BANQUETERÍA; SERVICIOS DE RESTAURACIÓN Y CATERING; SERVICIOS DE RESTAURANTE; SERVICIOS DE RESTAURANTE, QUE INCLUYEN SERVICIO DE COMIDA PARA LLEVAR Y SERVICIO DE RESTAURANTE DE COMIDA PARA LLEVAR.

Continúa en anexo

Denominación:

(Sólo en caso de marcas que, además de un elemento figurativo, se integren por palabras, letras o números)

POLLO REGIO

Representación del signo:



Elementos sobre los cuales No se solicita protección:

Continúa en anexo

Ubicación del establecimiento

Código postal:

Calle:

(Por ejemplo: Avenida Insurgentes Sur, Boulevard Ávila Camacho, Calzada, Corredor, etc.)

Número exterior:

Número interior:

Colonia:

(Por ejemplo: Ampliación Juárez, Residencial Hidalgo, Fraccionamiento, Sección, etc.)

Localidad:

Municipio o demarcación territorial:

Entidad federativa:

Entre calles (opcional):

Calle posterior (opcional):

País:

Prioridad reclamada:

(Sólo en caso de Marca o Aviso Comercial presentado en el extranjero)

País (oficina) de origen:

ESTADOS UNIDOS DE AMERICA

Número:

88112977

Fecha de presentación:

DD / MM / AAAA
11 / 09 / 2018

Manifiesto, bajo protesta de decir verdad, que los datos asentados en esta solicitud son ciertos y que, en caso de actuar como mandatario, cuento con facultades suficientes para llevar a cabo el presente trámite. Asimismo, me doy por enterado del tratamiento que se les dará a los datos personales contenidos en la presente solicitud.

Nombre y firma del solicitante o de su representante

CYNTHIA MADRIGAL DOMINGUEZ

SzCjOX3Q7tz5ly04wLJUPPidTfiHCPv29OhJSKG9/AFXABkYOsV3wsuxEZifyDt27xR6OOyV5gmjh5rYMr3SW4G4o3eyzCpuADillr1eqoZrQSxdNOu0nVBTUPlwYrO2/CV94tGy2GU/0R7sASEI5ejRHAD3TIFHlaLxdZXtc2NoBX+kKmkQm9eJG8JXINuVx4T+C8O7XXJNuy0evhEhbhdPi2qFhyJZA1cNGNehDJ77iUZHwu