

ESTTA Tracking number: **ESTTA1204233**

Filing date: **04/20/2022**

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

Proceeding no.	91269040
Party	Plaintiff Rheynard Howard (Presidential Wear, LLC)
Correspondence address	RHEYNARD HOWARD RHEYNARD HOWARD (PRESIDENTIAL WEAR LLC) PO BOX 20011 HOUSTON, TX 77225 UNITED STATES Primary email: presidential@presidentialbrand.com No phone number provided
Submission	Other Motions/Submissions
Filer's name	Rheynard w Howard
Filer's email	presidential@presidentialbrand.com
Signature	/Rheynard Howard/
Date	04/20/2022
Attachments	Trademark Notice to Produce.pdf(134653 bytes)

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

Presidential Wear, LLC)
a Texas limited liability company,))
Opposer,)
)
v.)
)
FREELIFE7, LLC)
a Louisiana limited liability company,))
Applicant.)
_____)

Opposition No.: 91269040
Application No.: 90/135,451

OPPOSER'S REQUESTS FOR ADMISSION

Opposer adopts and incorporates the Definitions, and Additional Instruction in the proceeding paragraphs of the Interrogatories as if they are set forth herein.

Pursuant to section 407 of the Trademark Trial and Appeal Board Manual of Procedure, Opposer propounds the following request for admission.

REQUEST FOR ADMISSION NO. 1:

Admit that the following mark is still pending: PRESIDENTIAL GIRLS WEAR 20 PEARLS.

REQUEST FOR ADMISSION NO. 2:

Admit that the line of business for the Mark PRESIDENTIAL GIRLS WEAR 20 PEARLS is in connection with On-line retail department store services for the sale, distribution and production of "Shirts; Sweatshirts; Hoodies" in International Class 25.

REQUEST FOR ADMISSION NO. 3:

Handwritten signature and date: J. 4/20/02

Admit that Opposer is the owner of U.S. Trademark Registration No. 4,461,243 for the mark PRESIDENTIAL WEAR, used in connection with "*Hats; Pants; Socks; T-shirts*" in International Class 25

REQUEST FOR ADMISSION NO. 4:

Admit that Opposer is the owner of U.S. Trademark Registration No. 4,461,293 for the mark PRESIDENTIAL, used in connection with "*Shirts, hats, jackets, shoes, socks, pants, scarves, sweatsuits, polo shirts, t-shirts, suits, dresses, sandals, pullovers, sweaters, ties, warm-up suits, jeans, boxer shorts, lingerie, gloves, shorts*" in International Class 25

REQUEST FOR ADMISSION NO. 5:

Admit that Opposer is the owner of U.S. Trademark Registration No. 4,561,161 for the mark PRESIDENTIAL GIRL, used in connection with "*Polo shirts, shirts, T-shirts, dresses, skirts, hats, pants, shoes, pullovers, jumpsuits, vests, jackets, sweaters, boots, swimsuits, warm up outfits, panties, socks, gloves, scarves, pantsuits, bras, skirts, tights, belts, neckties*" in International Class 25.

REQUEST FOR ADMISSION NO. 6:

Admit that Opposer is the owner of U.S. Trademark Registration No. 4,711,248 for the mark PRESIDENTIAL WEAR, used in connection with "*Computerized on-line retail store services in the field of personalized decorated apparel; On-line retail store services featuring t-shirts, sweatshirts, and headwear*" in International Class 35.

REQUEST FOR ADMISSION NO. 7:

Admit that the Opposer's PRESIDENTIAL Marks became famous long before Your (Applicant) August 25, 2020 filing date of the '451 Application.

REQUEST FOR ADMISSION NO. 8:

Admit that you do not have any triable claims under section 43 of the Lanham Act (15 U.S.C. § 1125(s)).

Handwritten signature and date: 4/26/22

REQUEST FOR ADMISSION NO. 9: Admit that your marks or business name is confusingly similar” to Opposer’s trademarks allegedly infringed.

REQUEST FOR ADMISSION NO. 11

Admit that the goods on which Applicant claims to use PRESIDENTIAL GIRLS WEAR 20 PEARLS, as evidenced by the ‘451 Application, are identical or highly related to the goods and related services on which Opposer uses its PRESIDENTIAL Marks.

REQUEST FOR ADMISSION NO. 12

Admit that the use of PRESIDENTIAL GIRLS WEAR 20 PEARLS is deception, when used in connection with highly related goods and services of the Opposer, within the meaning of 15 U.S.C. § 1052(d).

REQUEST FOR ADMISSION NO. 13

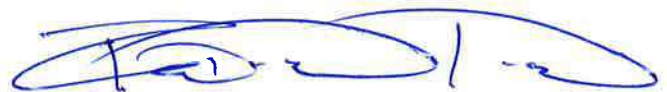
Admit that the PRESIDENTIAL GIRLS WEAR 20 PEARLS is substantially similar in sound and appearance to Opposer's distinctive and famous PRESIDENTIAL Marks.

REQUEST FOR ADMISSION NO. 14

Admit that the mark PRESIDENTIAL GIRLS WEAR 20 PEARLS, includes within it all of Opposer’s PRESIDENTIAL Marks, misleads consumers into believing the goods on which YOU claim to use the mark PRESIDENTIAL GIRLS WEAR 20 PEARLS are a portion, extension, expansion, or collaboration with Opposer’s PRESIDENTIAL Marks products and related services, or are otherwise associated with Opposer, when they are not.

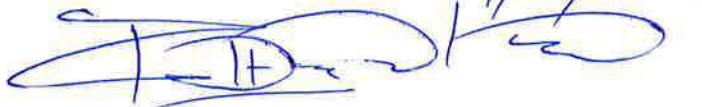
REQUEST FOR ADMISSION NO. 16: Admit that You have infringed any applicable trademarks or copyright under federal or state Law.

Respectfully submitted, this April 19, 2022



Rheyuard Howard

Handwritten note: 4/20/22

4/20/22


(Pro se) Presidential Wear, LLC
PO Box 20011 Houston,
TX 77225

Pro
4/20/22