

ESTTA Tracking number: **ESTTA1387893**  
Filing date: **10/07/2024**

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

Proceeding no.	91289728
Party	Defendant SO Supportive Ltd
Correspondence address	IRENE Y. LEE RUSS, AUGUST & KABAT 12424 WILSHIRE BLVD, 12TH FL. LOS ANGELES, CA 90025 UNITED STATES Primary email: trademark@raklaw.com No phone number provided
Submission	Opposition/Response to Motion
Filer's name	Irene Y. Lee
Filer's email	ilee@raklaw.com, trademark@raklaw.com, lkasis@raklaw.com
Signature	/Irene Y. Lee/
Date	10/07/2024
Attachments	Signed Decl of SO.pdf(204389 bytes ) Beauty Pioneers Srl v SO Supportive Ltd Opposition No 91289728 Oppos ers Discovery Request.pdf(149320 bytes ) Beauty Pioneers Srl v SO Supportive Ltd NVNT Opposition Proceeding No 91289728 Opposers Motion to Amend Opposition with Proposed Amended No- tice of Opposition and Exhibits.pdf(124104 bytes )

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

Beauty Pioneers S.R.L.,

Opposer,

v.

SO Supportive Ltd,

Applicant.

Opposition No.: 91289728

Mark: NVNT

Serial No.: 97/782,426

Publication Date: December 12, 2023

Filed: February 6, 2023

Applicant: SO Supportive Ltd

**DECLARATION OF SARAH OSTLER IN SUPPORT OF APPLICANT'S OPPOSITION  
TO OPPOSER'S MOTION TO AMEND NOTICE OF OPPOSITION**

I, Sarah Ostler, declare as follows:

1. I am the Secretary and an executive of applicant, SO Supportive Ltd ("Applicant"). I have personal knowledge of the facts set forth herein and if called and sworn as a witness, could and would testify competently thereto.

2. This Declaration is submitted in support of Applicant's Opposition to opposer, Beauty Pioneers S.R.L.'s ("Opposer") Motion to Amend Notice of Opposition ("Motion").

3. Opposer spent the last several months interfering with Applicant's continued effort to market and sell its NVNT branded products and build the NVNT brand power.

4. I have learned that Opposer's owner and executive, Giannantonio Negretti, has contacted Applicant's existing and prospective business partners and distributors and made false claims that Applicant does not own the trademark rights to the NVNT mark simply because it does not have a federal trademark registration for the mark. In response, Applicant's business partners started questioning Applicant's ability to market and sell the NVNT branded products instead of finalizing negotiation of purchase orders.

5. For example, over the last several months, Applicant has developed a business relationship with an international retail client that was planning on submitting hundreds of thousands of dollars' worth of purchase orders. However, Mr. Negretti reached out to this client

and made various false assertions regarding Applicant's ownership of the NVNT mark, including that Applicant does not own the trademark rights to the NVNT mark simply because it does not have a federal trademark registration for the mark. This international retail client has completely halted all significant purchase orders for Applicant's NVNT product until the alleged "trademark dispute" is settled.

The signatory, being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. §1001, and that such willful false statements and the like may jeopardize the validity of this submission, declares that all the statements made of her own knowledge are true and all statements made on information and belief are believed to be true.

Dated: 10.7.24

  
Sarah Ostler

**CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing **DECLARATION OF SARAH OSTLER IN SUPPORT OF APPLICANT'S OPPOSITION TO OPPOSER'S MOTION TO AMEND NOTICE OF OPPOSITION** has been served on Applicant via electronic mail, to the following e-mail address(es):

John J. O' Malley  
Volpe Koenig  
30 South 17<sup>th</sup> Street, Suite 1800  
Philadelphia, PA 19103  
Litigation@vklaw.com; JOMalley@vklaw.com; CSteadman@vklaw.com;  
LitigationParalegals@vklaw.com  
Attorney for Opposer

Dated: 10/7/2024

\_\_\_\_\_  
/s/

Natalie Ayala

**From:** William D. Harger WHarger@vklaw.com   
**Subject:** Beauty Pioneers S.r.l. v. SO Supportive Ltd. Opposition No. 91289728 - Opposer's Discovery Request  
**Date:** September 17, 2024 at 1:29 PM  
**To:** ilee@raklaw.com, jmaio@raklaw.com, labukasis@raklaw.com, trademark@raklaw.com  
**Cc:** John O'Malley JOMalley@vklaw.com, Chelsea A. Steadman CSteadman@vklaw.com, Desiree L. Wolf DWolf@vklaw.com

The attached is being sent on behalf of attorney John J. O'Malley.

Counsel,

Please find here attached:

1. Opposer's First Set of Interrogatories 2024.9.17
2. Opposer's First Set of Requests for Admission 2024.9.1
3. Opposer's First Set of Requests for Production 2024.9.17

Best regards,

William Harger



Intellectual Property Law

**William D. Harger**  
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FINAL Opposer's First Set of  
Interrogatories 2024.9.17.pdf




FINAL Opposer's First Set of  
Requests for Admission 2024.9....



FINAL Opposer's First Set of  
Requests for Production...



**From:** Desiree L. Wolf DWolf@vklaw.com   
**Subject:** Beauty Pioneers S.r.l. v. SO Supportive Ltd. (NVNT MARK) - United States Trademark Opposition Proceeding No. 91289728 - Opposer's Motion to Amend Opposition with Proposed Amended Notice of Opposition and Exhibits  
**Date:** September 17, 2024 at 3:14 PM  
**To:** ilee@raklaw.com, jmaio@raklaw.com, labukasis@raklaw.com, trademark@raklaw.com  
**Cc:** John O'Malley JOMalley@vklaw.com, Chelsea A. Steadman CSteadman@vklaw.com, \_Litigation-Paralegals \_Litigation-Paralegals@vklaw.com

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Dear Counsel:

Attached please find a service copy of Opposer's Motion to Amend Opposition with Proposed Amended Notice of Opposition and Exhibits filed via TTAB today with regard to the above-referenced matter.

If you have any questions, please contact us.

Thank you,  
Desiree



Intellectual Property Law

**Desiree L. Wolf**

*Paralegal Specialist*

*Trademark Team Leader*

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[005] TTAB Opposer's Motion to Amend Opposition with Propose...

