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

Proceeding	91230510
Party	Plaintiff PRL USA Holdings, Inc.
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Submission	Plaintiff's Notice of Reliance
Filer's Name	Daniel I. Schloss
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Signature	/Daniel I. Schloss/
Date	08/10/2018
Attachments	91230510 Opposer Notice of Reliance - Discovery Deposition Excerpts.pdf(672783 bytes )



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

#### IN THE MATTER OF APPLICATION

Mark: POLO KING
Applicant: Brasilio Machado
Serial No.: 87/019,978

Published in

the **Official Gazette**: September 20, 2016

)
)
Opposition No. 91230510
)
)

## OPPOSER'S NOTICE OF RELIANCE ON PORTIONS OF DISCOVERY DEPOSITION OF APPLICANT BRASILIO MACHADO

Pursuant to 37 C.F.R. §§ 2.120(k)(1), 2.120(k)(3), and 2.122(g), Opposer, PRL USA Holdings, Inc., by its undersigned attorneys, hereby gives notice that it will rely on certain portions of the discovery deposition of Applicant Brasilio Machado. Attached herein as Exhibit 1 are excerpts from Applicant's deposition transcript as indicated below:

Page Numbers	Line Numbers
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40	15-20, 24-25



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Respectfully submitted,

Dated: August 10, 2018 By: /Daniel I. Schloss/

Daniel I. Schloss
GREENBERG TRAURIG, LLP

200 Park Avenue, 38<sup>th</sup> Floor New York, New York 10166

Tel: (212) 801-2256 Fax: (212) 801-6400

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies on this 10<sup>th</sup> day of August, 2018 that a true and correct copy of the foregoing Opposer's Notice of Reliance on Portions of Discovery Deposition of Applicant Brasilio Machado is being delivered via e-mail to Applicant at his email addresses of record for this proceeding, namely, brasilio@machadolaw.net and brasilio@me.com.

\_/Daniel I. Schloss/ Daniel I. Schloss



## **EXHIBIT 1**



Page 1 1 IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD 2 3 In re: U.S. Application Serial NO. 87019978 Mark: POLO KING Published: September 20, 2016 5 6 PRL USA HOLDINGS, INC., Opposition No. 91230510 7 Opposer, 8 -against-9 BRASILIO MACHADO, 10 Applicant. 11 12 13 DEPOSITION OF: BRASILIO MACHADO 14 DATE: October 18, 2017 15 10:29 a.m. - 12:00 p.m. TIME: 16 PLACE: Greenberg Traurig, LLP 333 Southeast Second Avenue 17 Suite 4400 Miami, Florida 18 REPORTER: Chloe Leroux, FPR 19 20 21 22 23 24 25



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