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

Proceeding	91231624
Party	Plaintiff Rolex Watch U.S.A., Inc.
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Submission	Plaintiff's Notice of Reliance
Filer's Name	Adam Sgro
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Date	12/04/2020
Attachments	01664978.PDF(5408393 bytes)

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

ROLEX WATCH U.S.A., INC.,

Opposition No.: 91231624

Serial No.: 79172020

Opposer

vs.

PWT A/S

Applicant.

OPPOSER'S SECOND NOTICE OF RELIANCE

Official Records and Internet Evidence

Pursuant to 37 C.F.R. § 2.122, and Rule 704 of the TBMP, Opposer, Rolex Watch U.S.A., Inc. ("Rolex") submits this Second Notice of Reliance. Specifically, Rolex seeks to rely upon the official records of the Trademark Trial and Appeal Board ("TTAB"), USPTO, and internet evidence attached as **Exhibit A**. Rolex is submitting this evidence to show that from 2009 through 2017 Rolex has taken active steps and continues to take active steps to protect and enforce its Crown Design trademark.

Rolex also seeks to rely upon the official records of the United States District Court Middle District of Florida, Tampa Division, attached as **Exhibit B**. Rolex is submitting this evidence to show that Rolex has taken active steps to protect and enforce its Crown Design trademark.

The records in **Exhibit A** include the following:

- 1) Rolex's Notice of Opposition filed against the Application No. 77405892;
- 2) Rolex's Notice of Opposition filed against the Application No. 85835860;
- 3) Rolex's Notice of Opposition filed against the Application No. 85697658;
- 4) Rolex's Notice of Opposition filed against the Application No. 79145710;
- 5) Rolex's Notice of Opposition filed against the Application No. 79145541;
- 6) Rolex's Notice of Opposition filed against the Application No. 86446646;
- 7) Rolex's Notice of Opposition filed against the Application No. 86756557;
- 8) Rolex's Notice of Opposition filed against the Application No. 79176756;
- 9) Rolex's Notice of Opposition filed against the Application No. 87204867;
- 10) Rolex's Notice of Opposition filed against the Application No. 87307898; and
- 11) A list of proceedings in the TTAB where Rolex has asserted its rights to the CROWN DESIGN trademark, namely Reg. No. 0657756, taken from <https://ttabvue.uspto.gov> on November 17, 2020.

The records in **Exhibit B** include the following:

- 12) The complaint filed by Rolex in the case Rolex Watch U.S.A., Inc. v. Humza Jewelers Inc., et al. 16-cv-02219, in the Middle District of Florida.

Dated: December 4, 2020

Respectfully Submitted,

ROLEX WATCH U.S.A., INC.

By: /Beth Frenchman/
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Second Notice of Reliance has been served on this day of December 4, 2020, by electronic mail to:

ipmail@dykema.com, efingerhut@dykema.com and mgentner@dykema.com

/Veronika Sostak/
Veronika Sostak

EXHIBIT A

Explore Litigation Insights

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