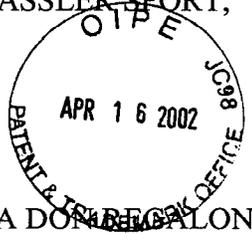


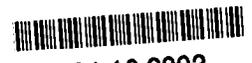
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

PUMA AG RUDOLF DASSLER SPORT,)
)
Opposer,)
)
v.)
)
MOURAD, SAMIR DBA DON BEGALON,)
)
Applicant)



Opposition No. 123,141



04-16-2002

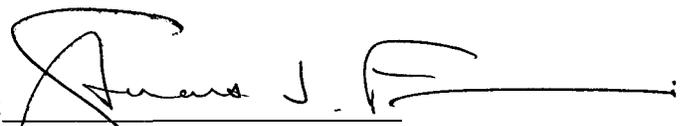
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REQUEST FOR ENTRY OF STIPULATED PROTECTIVE ORDER

The parties, having stipulated to the entry of a protective order under Rule 26(c) of the Federal Rules of Civil Procedure to protect trade and business secrets or other confidential information which may be disclosed in this matter, respectfully request entry of the Stipulated Protective Order submitted herewith.

Respectfully submitted,

PUMA AG RUDOLF DASSLER SPORT

By: 

David S. Safran
Stuart J. Friedman
NIXON PEABODY LLP
8180 Greensboro Drive, Suite 800
McLean, VA 22102
(703) 790-9110
Attorneys for Opposer

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

| | | |
|--------------------------------|---|------------------------|
| PUMA AG RUDOLF DASSLER SPORT, |) | |
| |) | |
| Opposer, |) | Opposition No. 123,141 |
| |) | |
| v. |) | |
| |) | |
| MOURAD, SAMIR DBA DON REGALON, |) | |
| |) | |
| Applicant |) | |

STIPULATED PROTECTIVE ORDER

The parties, having stipulated to the entry of a protective order under Rule 26(c) of the Federal Rules of Civil Procedure to protect trade and business secrets or other confidential information which may be disclosed in this matter, and the Trademark Trial and Appeal Board, being fully advised.

IT IS HEREBY ORDERED THAT a protective order be entered, as follows:

1. The term “Confidential Information” as used herein means documents produced or information disclosed by a party during discovery or testimony in this action and designated by that party as “CONFIDENTIAL” during a deposition or visibly marked by the producing party with the designation “CONFIDENTIAL”.
2. Documents or information may be designated “CONFIDENTIAL” if such documents or information constitute a trade secret or other confidential research, development or commercial information, the release of which to the public would adversely affect the producing party’s ability to conduct its business or adversely affect its competitive position. No document or information may be designated as “CONFIDENTIAL” unless the disclosing party has a reasonable basis for believing that the information being disclosed is confidential, proprietary or commercial information concerning which restrictions upon disclosure or access should be imposed.
3. The terms of this Order shall not apply to information which, although designated “CONFIDENTIAL” or contained in a document designated as “CONFIDENTIAL” by the

disclosing party, can be shown by the other party to be information which:

(a) at or prior to disclosure thereof by the disclosing party was in the public domain; or

(b) entered the public domain, subsequent to disclosure thereof by the disclosing party, without any violation of this Order; or

(c) was in the other party's possession free of any obligation of confidence at the time of disclosure thereof by the disclosing party; or

(d) was communicated to the other party by a third party who lawfully possessed the information and was under no obligation of confidence to the disclosing party.

4. Access to Confidential Information of either party shall be restricted solely to the outside counsel of record in this proceeding and their necessary legal and clerical employees and shall not be disclosed to any others, including officers, in house counsel, or employees of the parties unless such disclosure is authorized by the party disclosing the information in accordance with the procedures set forth in Paragraph 5 hereof. Anyone receiving Confidential Information shall be bound by the terms of this Order and shall have the responsibility, prior to disclosing Confidential Information to any other person permitted access pursuant to this paragraph, to take all steps which may be necessary to ensure compliance by such other person with the terms of this Order.

5. Insofar as the attorneys of record in receipt of Confidential Information may deem it necessary for the preparation of the case in this proceeding to disclose such Confidential Information to persons other than those designated in Paragraph 4 hereof, a designation of the information to be disclosed and the name, address and title of the person to whom the Confidential Information is to be disclosed shall be submitted in writing to opposing counsel. Such notice shall be served by certified mail, return receipt requested. Unless advised to the contrary within fifteen (15) days after the date of mailing of such request, it shall be presumed that the party to whom notice is given has no objection to the request. Any objection shall be served by certified mail, return receipt requested, and shall be conclusive unless the Board rules otherwise. Any person permitted access to Confidential Information pursuant to the procedures of this Paragraph 5 shall read this Order and shall agree in writing to be bound by this Order by

executing the statement attached hereto as Exhibit A prior to receiving any disclosure of Confidential Information.

6. Attendance at oral depositions during the actual disclosure of confidential information shall, at a party's request, be limited to such persons as are qualified to receive Confidential Information in accordance with Paragraphs 4 and 5 hereof.

7. All transcripts, depositions, exhibits, responses to discovery and other information or documents filed with the Board which contain information designated as "CONFIDENTIAL" or paraphrasing confidential information, shall be filed in sealed envelopes or other appropriate sealed containers, appropriately identifying this proceeding and the nature of the contents of the envelope or container, and bearing the legend:

FILED UNDER SEAL – SUBJECT TO PROTECTIVE ORDER

The materials contained in this envelope (container) have been designated confidential, pursuant to a protective order, and are not to be disclosed or revealed except to the Trademark Trial and Appeal Board and counsel for the parties, or by order of a court.

8. All transcripts, depositions, exhibits, responses to discovery, and all other information or materials received by attorneys of record for either party, which are designated by the other party as containing or comprising Confidential Information, shall be retained by the receiving party's attorneys and shall be used by such persons solely for the purposes of this proceeding and for no other purpose, and shall not be disclosed to others, except as agreed to between the attorneys for the parties.

9. This Order shall be without prejudice to the right of a party to bring before the Board at any time the question of whether any designated information is or is not confidential.

10. Nothing in this Order shall be deemed a waiver of a party's right to oppose production of any information or document for any reason other than that such information or document contains or comprises confidential information.

11. Upon final termination of this action, including all appeals, all Confidential

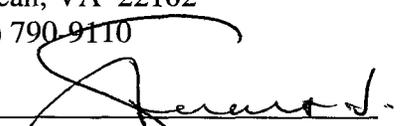
Information produced by any producing party within the terms of this Order, including all copies, extracts, and complete or partial summaries thereof, in the possession of any party, attorney or any other person permitted access thereto pursuant to Paragraphs 4 and 5 hereof, shall be either (a) returned to counsel for the producing party, or (b) if consent of counsel for the producing party has been received, destroyed with a representation of such destruction being made to counsel for the producing party.

IT IS BY THE TRADEMARK TRIAL AND APPEAL BOARD SO ORDERED.

Date: _____

Stipulated to and approved:

David S. Safran
Stuart J. Friedman
NIXON PEABODY LLP
8180 Greensboro Drive, Suite 800
McLean, VA 22102
(703) 790-9110

By:  _____
Attorneys for Opposer

Lee Fredric Sharra
TROJAN LAW OFFICES
9250 Wilshire Boulevard, Suite 325
Beverly Hills, CA 90212
(310) 777-8399

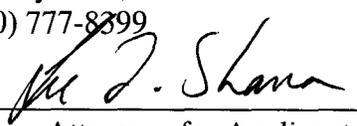
By:  _____
Attorneys for Applicant

EXHIBIT A

I have read and understand all of the terms of the Stipulated Protective Order entered in Opposition No. 123,141, styled *Puma AG Rudolf Dassler Sport v. Mourad, Samir dba Don Regalon*, before the Trademark Trial and Appeal Board of the U.S. Patent and Trademark Office, to which this Exhibit A is attached, and agree to be bound thereby. I understand and agree that Confidential Information may be discussed only among persons having access thereto pursuant to the Stipulated Protective Order in this proceeding.

Name: _____

Title: _____

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

In the Matter of Trademark Application No. 75/936,519
Published On: November 21, 2000

| | | |
|-------------------------------|---|------------------------|
| PUMA AG RUDOLF DASSLER SPORT |) | |
| Opposer |) | |
| v. |) | Opposition No. 123,141 |
| MOURAD, SAMIR DBA DON REGALON |) | |
| Applicant. |) | |

OPPOSER'S STIPULATED AMENDMENT TO THE NOTICE OF OPPOSITION

Opposer hereby requests that the Board enter the following amendment with regard to Paragraph 2 of the Notice of Opposition.

Original Notice of Opposition, paragraph 2 read as follows:

2. Opposer is the owner of U.S. Trademark Registration No. 1,039,649, registered May 11, 1976, for a design mark comprised of a leaping cat silhouette on a square background, as shown in Exhibit B attached to this Notice of Opposition, for goods which include, *inter alia*,: "Football Shoes; Baseball Shoes; Training Shoes; Track Shoes; Boxing Shoes; Basketball Shoes; Soccer Shoes; Tennis Shoes; Bathing Shoes; Sneakers; Golf Shoes; Ski Boots; Tennis Garments For Men-Namely, Tricot Shirts, Shorts; Socks; Overalls For Men; Sweatsuits For Men; Sweat Shirts For Men; Sport Shorts For Men" in International Class 25.

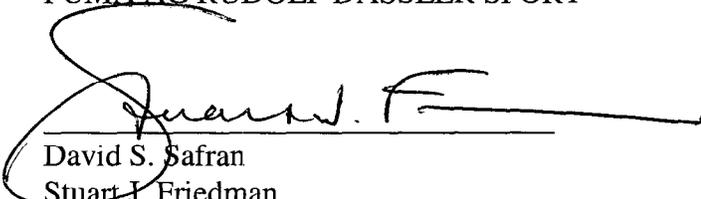
Please substitute the following amended paragraph for original paragraph 2:

2. Opposer is the owner of U.S. Trademark Registration No. 1,039,274, registered May 11, 1976, for a design mark comprised of a leaping cat silhouette on a square background, as shown in Exhibit B attached to this Notice of Opposition, for goods which include, *inter alia*,: "Football Shoes; Baseball Shoes; Training Shoes; Track Shoes; Boxing Shoes; Basketball Shoes; Soccer Shoes; Tennis Shoes; Bathing Shoes; Sneakers; Golf Shoes; Ski Boots; Tennis Garments For Men-Namely, Tricot Shirts, Shorts; Socks; Overalls For Men; Sweatsuits For Men; Sweat Shirts For Men; Sport Shorts For Men" in International Class 25.

Respectfully Submitted,

PUMA AG RUDOLF DASSLER SPORT

Dated: 04-15-02



David S. Safran
Stuart J. Friedman
NIXON PEABODY LLP
8180 Greensboro Drive, Suite 800
McLean, VA 22102
(703) 790-9110
Attorneys for Opposer

Consent:

PUMA AG RUDOLF DASSLER SPORT

By 
Lee Fredric Sharra

Dated: 3/27/2002

R. Joseph Trojan
TROJAN LAW OFFICES
9250 Wilshire Blvd., Suite 325
Beverly Hills, CA 90212
(310) 777-8399
Attorneys for Applicant

2. In respect to the allegations of paragraph 2 of the Notice of Opposition, the averments are admitted.

Respectfully Submitted,
TROJAN LAW OFFICES
by

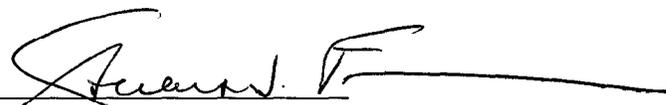
Dated: 3/27/2002



Lee Fredric Sharra
R. Joseph Trojan
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(310) 777-8399
Attorneys for Applicant
Samir Mourad dba Don Regalon

Consent:

PUMA AG RUDOLF DASSLER SPORT

By: 

David S. Safran
Stuart J. Friedman
NIXON PEABODY LLP
8180 Greensboro Drive, Suite 800
McLean, VA 22102
(703) 790-9110
Attorneys for Opposer

CERTIFICATE OF SERVICE

It is hereby certified that copies of the foregoing:

1. Opposer's Stipulated Amendment to the Notice of Opposition ;
2. Applicant's Stipulated Amendment to Applicant's Answer to the Notice of Opposition;
3. Request for Entry of Stipulated Protective Order;
4. Stipulated Protective Order;

were mailed by first class mail, postage prepaid, on April 16, 2002 to:

Lee Fredric Sharra, Esq.
TROJAN LAW OFFICES
9250 Wilshire Blvd.
Suite 325
Beverly Hills, CA 90212
(310) 777-8399

Rebecca M. Stark
April 16, 2002