

RESPONSE TO INTERROGATORY NO. 1 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

1. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
2. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
3. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
4. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in BAD FAITH and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This

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firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

5. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges

Subject to and without waiving its general and specific objections Applicant responds as follows:.

The name and mark "STACCHI'S & CO. 1996" has never been used in commerce.

This name and was registered as a Fictitious Business Name Statement in March 1996 to reserve the name and notice others that I intended to do business in the future under that name.

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Applicant in 1996 created about 25 sample products, none are now in existence, and this was a one time creation.

RESPONSE TO INTERROGATORY NO. 2 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

6. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
7. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
8. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
9. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-

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recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

10. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges

Subject to and without waiving it's general and specific objections Applicant responds as follows:

The name and mark "STACCHI'S & CO. 1996" has never been used in commerce.

This name and mark was registered as a Fictitious Business Name Statement in California in March 1996 to reserve the name and notice others that I intended to do business in the future under that name.

Applicant in 1996 created about 25 sample products, none are now in existence, and this was a one time creation.

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RESPONSE TO INTERROGATORY NO.3 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

11. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
12. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
13. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
14. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This

firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

15. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges

Subject to and without waiving its general and specific objections Applicant responds as follows:

The name and mark "STACCHI'S & CO. 1996" has never been used in commerce.

This name and mark was registered as a Fictitious Business Name Statement in California in March 1996 to reserve the name and notice others that I intended to do business in the future under that name

Applicant in 1996 created about 25 sample products, none are now in existence, and this was a one time creation.

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RESPONSE TO INTERROGATORY NO. 4 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

16. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
17. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
18. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
19. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This

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firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

20. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows:.

Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has no invoices, documents, or writings that would establish "use" in commerce.

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RESPONSE TO INTERROGATORY NO.5 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

21. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
22. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
23. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
24. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards

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would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in GOOD FAITH used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's BAD FAITH dealings in this discovery procedure. Applicant has at all times acted in GOOD FAITH and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in GOOD FAITH Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

25. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges.

Subject to and without waiving it's general and specific objections Applicant responds as follow:

- A. Sample bath beads.
- B Labels on sample
- C None
- D None were sold-free samples
- E Given away free of charge
- F No one other than myself
- G Applicant made the sample beads

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- H No. That was a one time project.
- I NONE
- J. No changes, this was a one time experimental project
- K. Approximately April 1996 to present

RESPONSE TO INTERROGATORY NO.6 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

- 26. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
- 27. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
- 28. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
- 29. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other

Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

30. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges

31. Applicant objects to this Interrogatory to the extent it is requesting financial information that is irrelevant to these proceedings and it is asking for speculations that Applicant cannot reasonable do.

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Subject to and without waiving its general and specific objections Applicant responds as follows:.

Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce and has not had any income. It has been over 6 years and Applicant has not been able to do business, therefore, Applicant does not anticipate any income in the next 5 years. Applicant anticipates that due to the financial burden of this proceedings and other intangibles, it will suffer losses for the next five years.

RESPONSE TO INTERROGATORY NO.7 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

- 32. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
- 33. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
- 34. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage

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of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.

35. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

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36. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows:.

Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce and has not done any marketing. Applicant would anticipate utilizing introduction letters and brochures. .

RESPONSE TO INTERROGATORY NO.8 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

37. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
38. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
39. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has

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only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.

- 40. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.
- 41. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges

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Subject to and without waiving its general and specific objections Applicant responds as follows:

All races and ages with an emphasis on age group from birth to 72

RESPONSE TO INTERROGATORY NO.9 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

42. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
43. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
44. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
45. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other

Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

46. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows:.

None known at this time.

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RESPONSE TO INTERROGATORY NO.10 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

47. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
48. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
49. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
50. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This

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firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

- 51. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows:.

Applicant has not received any cease and desist letters, warning or objections to her attempting to be an entrepreneur and start her own business. The only opposition, harassment and intimidation she has received in reference to her trying to join the free enterprise market has been from Sinclair

RESPONSE TO INTERROGATORY NO.11 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

52. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
53. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
54. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
55. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a

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single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

56. Applicant objects to this Interrogatory to the extent it request information that is protected by attorney-client privilege and work-product doctrine and other privileges Subject to and without waiving its general and specific objections Applicant responds as follows:.

Applicant is in the formation stage of her business and she is still working on planning and design of her business. Applicant has not engaged in commerce and does not have any employees and knows of no persons that have DIRECT or best knowledge of Applicant's business.

RESPONSE TO INTERROGATORY NO. 12 :

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Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

57. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
58. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
59. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
60. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no

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training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

- 61. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows.

Any use will be in the Bay are of California. The one time project was in the Bay area.

RESPONSE TO INTERROGATORY NO 13 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

62. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
63. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
64. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
65. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence,

Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

66. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows:

- (a) *Applicants sole grounds for the text part of her business is an idea and thought that she created herself. She had no professional, research and/or any other form of assistance .*
- (b) *Applicants sole grounds for the "design" part of her business is family related. The face is that of her cousin, the eyes are that of her niece and the rays are that of her mother.*

RESPONSE TO INTERROGATORY NO. 14 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

67. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for

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Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.

68. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
69. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
70. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this

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discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

- 71. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows:.

Applicant will make available for inspection and copying writings, if any, identified in Interrogatory 13.

RESPONSE TO INTERROGATORY NO. 15 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

- 72. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
- 73. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).

74. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
75. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate

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Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in GOOD FAITH Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

- 76. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving it's general and specific objections Applicant responds as follows:

Applicant answered Interrogatory 14 positive.

RESPONSE TO INTERROGATORY NO. 16 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

- 77. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
- 78. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
- 79. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate,

manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.

80. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

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81. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows:.

Applicant is in the formation stage of her business and has not conducted her business in commerce. Applicant has not engaged in commerce and she has not granted or been granted any authority in reference to her business. She has filed the name as a fictitious business name.

RESPONSE TO INTERROGATORY NO. 17 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

82. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
83. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
84. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has

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only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.

85. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.
86. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges

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Subject to and without waiving its general and specific objections Applicant responds as follows..

Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has no basis at this time for intended use and can not anticipate any basis until funding is found and Applicant. Applicant sole focus, other than fighting Sinclair, is seeking funding to engage in commerce.. It has been over 6 years and Applicant has not been able to do business, therefore, Applicant does not anticipate any retail store services being used.

RESPONSE TO INTERROGATORY NO. 18 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

87. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
88. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
89. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to

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conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.

90. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.
91. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges

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Subject to and without waiving its general and specific objections Applicant responds as follows:.

Not sure of question, but none to the best of my knowledge in answering this question.

RESPONSE TO INTERROGATORY NO 19 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

92. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
93. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
94. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
95. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other

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Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

96. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows:.

None

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RESPONSE TO INTERROGATORY NO.20 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

97. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
98. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
99. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
100. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This

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firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

101. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows:.

Applicant is in the formation stage of her business and said business will be a sole proprietorship. There are no other persons, officers or individuals with knowledge or information in regards to this not yet started business.

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RESPONSE TO INTERROGATORY NO. 21 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

102. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
103. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
104. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
105. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a

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single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

106. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows:.

Applicant is in the formation stage of her business and has not had met any opposition, confusion or concerns in reference to her business from anybody other than Sinclair. Sinclair is the sole and proximate cause of any and all confusion, if any.

RESPONSE TO INTERROGATORY NO. 22 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

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107. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
 108. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
 109. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
 110. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement,

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Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

111. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges

Subject to and without waiving its general and specific objections Applicant responds as follows:

Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce.. It has been over 6 years and Applicant has not been able to do business, therefore, Applicant has no future plans for expansion and it would be pure speculation to anticipate any expansion. Applicant at this time does not anticipate any expansion.

RESPONSE TO INTERROGATORY NO. 23 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

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112. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
113. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
114. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
115. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence,

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Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

116. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows:.

Applicant had no knowledge or information available that indicated that her design would be in conflict with Sinclair.

RESPONSE TO INTERROGATORY NO. 24 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

117. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.

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- 118. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
- 119. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
- 120. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all

likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in GOOD FAITH Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

121. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows:.

My response is in the negative to Interrogatory 23.

RESPONSE TO INTERROGATORY NO.25 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

122. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
123. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
124. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and

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complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.

125. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would

act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

126. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows:

Applicant had no prior knowledge of Sinclair and/or its affiliates design.

RESPONSE TO INTERROGATORY NO.26 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

127. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
128. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
129. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to

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conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.

130. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.
131. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges

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Subject to and without waiving its general and specific objections Applicant responds as follows:.

Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce and anticipates when and if this business is ever engaged in commerce that the goods will be distributed from Applicants home based business and flea markets. .

RESPONSE TO INTERROGATORY NO.27 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

132. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
133. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
134. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to

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conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.

135. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

136. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges

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Subject to and without waiving its general and specific objections Applicant responds as follows:

None of interrogatories 1-26 answers were based on the use of the "design" exclusive of other parts.

RESPONSE TO INTERROGATORY NO. 28 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

137. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
138. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
139. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
140. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the

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Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

- 141. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows:.

Applicant has never used or intends to use the Design apart from the name or any other part.

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RESPONSE TO INTERROGATORY NO. 29 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

142. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
143. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
144. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
145. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards

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would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

146. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows:

Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not used or intends to use the Design apart from other portions of the name or mark.

RESPONSE TO INTERROGATORY NO. 30 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

- 147. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
- 148. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
- 149. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
- 150. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This

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firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

151. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows:.

Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not used or intends to use the Design apart from other portions of the name or mark in commerce..

RESPONSE TO INTERROGATORY NO 31 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

- 152. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
- 153. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
- 154. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
- 155. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This

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firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

156. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows:.

None.

RESPONSE TO INTERROGATORY NO. 32 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

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- 157. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
- 158. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
- 159. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
- 160. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement,

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Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

161. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows:.

Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not used or intends to use the Design apart from other portions of the name or mark in commerce or in any region. Any commerce of the name and mark would be in the California bay area.

Applicant is in the formation stage of her business and said business will be a sole proprietorship. There are no other persons, officers or individuals with knowledge or information in regards to this not yet started business.

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RESPONSE TO INTERROGATORY NO. 33 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

- 162. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
- 163. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
- 164. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
- 165. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a

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single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in GOOD FAITH used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's BAD FAITH dealings in this discovery procedure. Applicant has at all times acted in GOOD FAITH and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in GOOD FAITH Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

166. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows:

Applicant is in the formation stage of her business and has not had met any opposition, confusion or concerns in reference to her business from anybody other than Sinclair. Sinclair is the sole and proximate cause of any and all confusion, if any.

RESPONSE TO INTERROGATORY NO. 34 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

167. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.
168. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
169. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. . Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
170. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement,

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Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in **GOOD FAITH** Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

171. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows:.

A minister friend, George Long, prayed and helped to explain the tricky questions and gave ideas on answering Interrogatory 1-35 and the 12 or so subparts..

RESPONSE TO INTERROGATORY NO. 35 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

172. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.

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173. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
174. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
175. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all

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likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in GOOD FAITH Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

176. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges Subject to and without waiving its general and specific objections Applicant responds as follows:

A minister friend, George Long, prayed and helped to explain the tricky questions and gave ideas on answering Document Requests 1-42 .

RESPONSE TO INTERROGATORY NO. 36 :

Applicant supplements and clarifies her response to this INTERROGATORY subject to any objections and without waiving such objections. Applicant objects to this Interrogatory in the following specifically noted and outlined objections:

177. Applicant objects to this Interrogatory in that the question is vague, ambiguous and not stated in a clear, concise and understandable manner in it's wording to allow for Applicant to be able to reasonable ascertain as to what specifically is meant by the Interrogatory.

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- 178. Applicant objects to this Interrogatory in that it is burdensome, repetitive, and in combination with the other Interrogatories and subparts are more than 25 in number as outlined Federal Rule 33 (a).
- 179. Applicant objects to this Interrogatory, 26 other Interrogatories and the additional 10 subpart questions as burdensome and unreasonable in relation to the severity and complexity of this case. The burden of answering these Interrogatories is outweighed by the likely benefit, taking into account the controversy, the resources of the parties (particularly Applicant) and the issues at stake. Sinclair's sole purpose in propounding this exorbitant number of Interrogatories is to harass, intimidate, manipulate, confuse and frustrate the Applicant. Applicant is in the formation stage of her business and has not been able to acquire any additional funding to allow her to conduct her business in commerce. Applicant has not engaged in commerce, but has only attempted to reserve the name and sought a trademark to protect the utilization of the mark when and if her business is opened.
- 180. Applicant objects to this Interrogatory and the other Interrogatories in that they are presented in **BAD FAITH** and they do not carry out the purpose and spirit of the Federal Rules of Discovery. Sinclair in this Interrogatory and the 26 other Interrogatories and subparts has purposely complicated and stated questions that they knew were objectionable, unclear and vague. Sinclair is represented by a well-recognized and qualified law firm that has a very good rating among law firms. This firm has a degree of expertise in the field of Trademarks and by judicial standards would be qualified to handle complex matters in this area of law. Applicant is a single mom living near the poverty level. Applicant finished high school and has no training or experience in the law. Applicant in **GOOD FAITH** used the same structure and wording (as Sinclair had used in their Interrogatory request to her) in asking her Interrogatories to Sinclair. To Applicants' shock and amazement, Sinclair has objected to every Interrogatory presented by Applicant. In essence, Sinclair has objected (in theory) to the wording, vagueness and substance of its own Interrogatories. The Applicant objects to Sinclair's **BAD FAITH** dealings in this discovery procedure. Applicant has at all times acted in **GOOD FAITH** and answered Sinclair's tricky questions when Sinclair knew that they would in all

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likelihood confuse, scare, intimidate and cause delay in this discovery process. Applicant now realizes that Sinclair can utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant if Applicant does not object to such tactics. Applicant acting as an ordinary, reasonable and prudent person believed in GOOD FAITH Sinclair would act in good faith and answered the Interrogatories previously to the best of her knowledge not knowing that Sinclair's strategy and plan of action was to utilize trickery, deceitfulness and unscrupulous conduct to confuse, intimidate, harass, burden, scare and frustrate Applicant in the discovery procedure.

- 181. Applicant objects to this Interrogatory to the extent it request information that is protected by work-product doctrine and other privileges
Subject to and without waiving its general and specific objections Applicant responds as follows:.

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DATED this 29th day of August, 2003.

By:


SUMATRA KENDRICK

P.O. Box 434
Berkeley, Calif 94701
(510) 799-6447

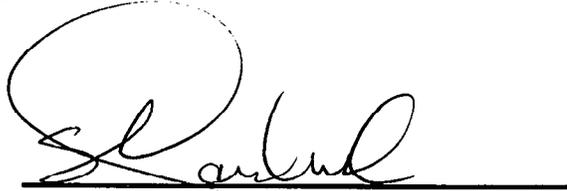
PRO SAE

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing SUMANTRA KENDRICK'S SECOND SET OF SUPPLEMENTAL ANSWERS TO INTERROGATORIES was served on Opposer by mailing a true copy thereof to Opposer, by Certified Mail, postage prepaid, this 29th, Day of August, 2003.

MAILED TO:

MR. JOHN C. STRINGHAM
WORKMAN, NYDEGGER,
& SEELY
1000 Eagle Gate Tower
60 East South Temple
Salt Lake City, UT. 84111



A handwritten signature in cursive script, appearing to read "S. Kendrick", is written over a solid horizontal line.

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