



In the Matter of Trademark Application Serial No. 78/206,862  
For the mark KAYLA KLEEVAGE  
Published in the *Official Gazette* on October 7, 2003  
Opposition No. 91158169

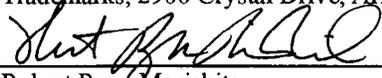
Respectfully submitted,

ANDERSON & MORISHITA

Dated: July 6, 2004

By:   
Robert Ryan Morishita  
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I hereby certify that this correspondence is being deposited with the United States Postal Service as Express Mail P.O. to Addressee No. EU 957831305 US in an envelope addressed to: Box TTAB, Assistant Commissioner of Trademarks, 2900 Crystal Drive, Arlington, VA 22202-3513, on July 6, 2004

  
Robert Ryan Morishita

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Certificate of Service

I hereby certify that a true and correct copy of the foregoing Applicant's Motion for Summary Judgment was served on attorneys for Opposer on July 6, 2004 by First Class Mail, postage prepaid, as follows:

Scott W. Kelley  
Kelly Bauersfeld Lowry & Kelley, LLP  
6320 Canoga Ave., Suite 1650  
Woodland Hills, CA 91367



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Robert Ryan Morishita  
Attorney for Applicant



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### Facts

The following facts are undisputed. Applicant commenced use of the mark KAYLA KLEEVAGE to identify personal appearances by a performer, Kimberlee Port ("Port") on or about March 25, 1991. Applicant's Response to Opposer's Interrogatories, Response No. 1. Applicant commenced use of the mark KAYLA KLEEVAGE to identify a website appearing at [www.kaylakleevage.com](http://www.kaylakleevage.com) on or about July 29, 1996. *Id.* Since that time, Applicant has used the KAYLA KLEEVAGE mark extensively and exclusively to identify personal appearances by Port as well as online photographs and performances by Port on the website. Applicant's Response to Opposer's Request for Documents, Response No. 5. Specifically, Applicant produced over two hundred pages of specimens showing continuous use of the mark to identify personal appearances by Port at trade shows, exhibitions, and strip clubs from 1991 to the present and continuous use of the mark to identify Applicant's website through several redesigns from 1996 to the present. *Id.* Applicant's use of the mark has consistently appeared as "KAYLA KLEEVAGE" in these specimens. *Id.*

Applicant filed a trademark application for the mark KAYLA KLEEVAGE on January 24, 2003. The KAYLA KLEEVAGE trademark application was published for opposition on October 7, 2003.

Opposer has variously used the marks "Kat Kleavage," "Cat Cleavage," "Kat," and "Kit Cleavage" since approximately May 2000. Opposer's Responses to Applicant's Request for Documents, Response No. 2 and Applicant's Responses to Opposer's Request for Documents, Response No. 14. Opposer commenced use of the mark KAT KLEEVAGE for "personal

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appearances” in January 2002 and for “Internet” on March 20, 2003. Opposer’s Responses to Applicant’s Interrogatories, Response No. 2. Opposer filed an application to register the mark KAT KLEEVAGE on September 8, 2003. Notice of Opposition, ¶ 3.

Opposer filed a Notice of Opposition to Applicant’s KAYLA KLEEVAGE mark on October 13, 2003. Opposer asserted that “the words ‘cleavage’, ‘kleevage’, and ‘kleavage’ are all descriptive in the mind of the consuming public of women’s breasts, and particularly large breasts in the XXX and adult entertainment industry.” *Id.* at ¶ 6. The present opposition was initiated October 22, 2003.

#### Argument

1. Applicant’s Mark, Taken As a Whole, Is Not Merely Descriptive of the Services Recited in Applicant’s Trademark Application

Applicant is entitled to summary judgment because Applicant’s KAYLA KLEEVAGE mark is not merely descriptive of personal appearances by an adult entertainer and providing live entertainment pictures and performances over the Internet. A mark is merely descriptive when it “describes an ingredient, quality, characteristic, function, feature, purpose or use of the specified goods or services.” T.M.E.P. section 1209.01(b) (citing *In re Gyulay*, 820 F.2d 1216, 3 USPQ2d 1009 (Fed. Cir. 1987); *In re Bed & Breakfast Registry*, 791 F.2d 157, 229 USPQ 818 (Fed. Cir. 1986); *In re MetPath Inc.*, 223 USPQ 88 (TTAB 1984); and *In re Bright-Crest, Ltd.*, 204 USPQ 591 (TTAB 1979)). In examining an application in an opposition, “[i]t is the mark as shown in the application and as used on the goods described in the application which must be considered.”

J. THOMAS MCCARTHY, MCCARTHY ON TRADEMARKS AND UNFAIR COMPETITION § 20:15

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(2003) (citing *Smith v. Tobacco By-Products & Chemical Corp.*, 493 F.2d 1235, 181 USPQ 339 (CCPA 1957)).

In this case, Opposer has made two leaps that are simply not supported by law. First, Opposer contends that Applicant's KAYLA KLEEVAGE mark is merely descriptive based on the dictionary definition of a *portion* of the mark. Notice of Opposition, ¶¶ 4 & 6. As the Board is well aware, however, in examining an application, the mark must be considered as a whole. In fact, a composite mark is registrable "if the combination of terms creates a unitary mark with a unique, nondescriptive meaning." T.M.E.P. section 1209.03(d) (citing *In re Colonial Stores Inc.*, 394 F.2d 549, 157 USPQ 382 (C.C.P.A. 1968) and *In re Shutts*, 217 USPQ 363 (TTAB 1983)).

Applicant has applied to register the composite mark KAYLA KLEEVAGE. In arguing that the mark is not registrable, Opposer has conceded that the composite mark KAYLA KLEEVAGE is not descriptive. Opposer's Response to Applicant's Interrogatories, Response No. 13 states: "Opposer does not contend that the composite mark 'KAYLA KLEEVAGE' is descriptive of such goods and services...." One can infer that Opposer chooses to ignore the mark's distinctiveness resulting from the "Kayla" portion of the mark plus the distinctive spelling "Kleevage" since the composite mark is a non-descriptive, registrable mark.

Second, Opposer contends that the mark KAYLA KLEEVAGE is descriptive of Applicant's services merely because one definition of "cleavage" is "the separation between a woman's breasts." Notice of Opposition, ¶¶ 4 & 6. This argument fails on two points.

First, the services recited in Applicant's application are "personal appearances by a celebrity adult entertainer" and "providing live adult entertainment pictures and performances via

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the web.” More specifically, as shown in the documents produced by Applicant during discovery, Applicant’s services are personal appearances made by Port and a website featuring performances and photographs of Port and other performers. Applicant’s Response to Opposer’s Request for Documents, Response No. 5.

While it is true that the mark serves to identify a “stage name” of a performer, it is well established that a fictitious name or “stage name” of a performer is registrable as a service mark for entertainment services. See MCCARTHY at § 13:34 (citing *In re Folk*, 160 USPQ 213 (TTAB 1968) and *In Re Wood*, 217 USPQ 1345 (TTAB 1983)). The mark KAYLA KLEEVAGE does not describe an “ingredient, quality, characteristic, function, feature, purpose or use” of personal appearances or web pictures and performances. T.M.E.P. section 1209.01(b). That is, the mark does not impart direct information regarding the characteristics of the services. To the contrary, any information given by the mark is “indirect or vague” that indicates suggestiveness rather than descriptiveness. MCCARTHY at § 11.19. For example, according to the dictionary relied upon so heavily by Opposer in its Notice of Opposition, the KAYLA KLEEVAGE mark would be equally or more suggestive of the services rendered by a geologist or minerologist, a cell biologist, or anyone who performs the act of “splitting” or “cleaving.”

Second, even accepting that one well known definition of “cleavage” is the separation between a woman’s breasts, the mark KAYLA KLEEVAGE is still not merely descriptive of Applicant’s “personal appearances” and “pictures and performances.” There is no more direct information given by the mark KAYLA KLEEVAGE for “personal appearances” and “pictures and performances via the web” than it would for a brassiere, a breast cancer program, saline

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breast implants, or, for that matter, a stage name for *any* female performer or spokesperson. In fact, Opposer has made the contradictory argument that her mark KAT KLEEVAGE is not descriptive of Opposer's services.<sup>1</sup> Opposer's Response to Applicant's Requests for Admissions, Response No. 6. Simply put, Opposer herself has established that the dictionary definition of the word "cleavage" does not render a composite mark descriptive. Opposer wants to have it both ways. Opposer is attempting to use this Opposition proceeding to manufacture an outcome where KAYLA KLEEVAGE, a mark that has been in use since 1991 for "personal appearances" and since 1996 for "pictures and performances" via the Internet, is denied registration as merely descriptive, to clear the way for the registration of her own KAT KLEEVAGE mark which has only been in use since 2002 and 2003, respectively, for identical services. Opposer's Responses to Applicant's Interrogatories, Response No. 2.

In summary, there is no genuine issue of material fact. More unusually, Applicant and Opposer agree that under the law, the composite mark KAYLA KLEEVAGE is non-descriptive. Opposer has "not contend[ed] that the composite mark 'KAYLA KLEEVAGE' is descriptive" and on this point, Applicant agrees. Moreover, Opposer has argued that including "Kleevage" in a mark does not render the mark descriptive of "personal appearances" and "pictures and performances via the web," and again, Applicant agrees. The Board should give effect to this understanding and dismiss the Opposition with prejudice, thereby allowing registration of the mark.

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<sup>1</sup> Comparison of Applicant's identification of services and that of Opposer's U.S. Trademark Application Serial No. 76/543,254 reveals identity between the two applications.

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2. The Mark is Entitled to Registration Has Acquired Distinctiveness as a Result of Substantially Exclusive and Continuous Use

Applicant is entitled to summary judgment even if the mark KAYLA KLEEVAGE is descriptive, because of the substantially exclusive and continuous use of the mark over thirteen years for personal appearances and eight years for pictures and performances via the web. Notwithstanding the provisions denying registration of descriptive marks, a mark is entitled to registration if the “mark used by the applicant ... has become distinctive of the applicant’s goods in commerce.” 15 U.S.C. section 1052(f). Distinctiveness can be shown by “proof of substantially exclusive and continuous use thereof as a mark by the applicant in commerce for the five years before the date on which the claim of distinctiveness is made.” *Id.*

In this case, KAYLA KLEEVAGE is used, and has been used since 1991, to identify Port, a performer who has made appearances at trade shows and expositions and adult entertainment venues. KAYLA KLEEVAGE is also used, and has been used since 1996, to identify a website featuring performances and photographs of Port and other entertainers. In fact, Applicant produced many pages of advertisements for personal appearances under the stage name KAYLA KLEEVAGE dating to March 1991 and webpages including the KAYLA KLEEVAGE mark dating to July 1996. Applicant’s Responses to Opposer’s Request for Documents, Response No. 5. The KAYLA KLEEVAGE mark is clearly capable of acquiring distinctiveness. The mark has been substantially the exclusive mark used to identify Port’s personal appearances and Applicant’s web pictures and performances featuring Port. Applicant’s use of the mark for over thirteen years for “personal appearances” and eight years for “pictures

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and performances via the web” by Port is more than sufficient to satisfy the statutory five year standard for establishing *prima facie* distinctiveness.

In fact, Applicant notes that Opposer has not disputed Applicant’s substantially exclusive and continuous use. Opposer has pointed out that there have been other uses of the word “cleavage” in stage names of other performers. Applicant does not dispute this, but points out that none of the other performers used the distinctive “Kayla” portion of the mark along with the distinctive spelling of “Kleevage.” “The mere fact that some other uses of the same mark existed does not mean that the ... use was not substantially exclusive.” MCCARTHY at § 15:62.

In summary, Applicant has produced evidence establishing substantially exclusive use over a much longer period of time established by statute, a fact not disputed by Opposer. If the Board finds that the mark KAYLA KLEEVAGE is not inherently distinctive, the Board should find that the mark has acquired distinctiveness over the long and continuous period the mark has been used.

#### Conclusion

The Board can and should grant summary judgment in favor of Applicant. There exist no genuine issues of material fact and Applicant is entitled to judgment as a matter of law. Under the facts developed through discovery, Opposer has failed to establish that Applicant’s mark is descriptive and, in fact, has conceded that the KAYLA KLEEVAGE mark is not merely descriptive. Moreover, even if the mark is merely descriptive, Applicant has brought forward more than enough undisputed evidence of acquired distinctiveness. Consequently, the Board should enter judgment in favor of Applicant and dismiss the Opposition.

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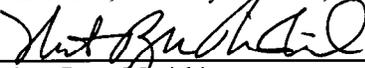
Respectfully submitted,

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Dated: July 6, 2004

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Robert Ryan Morishita

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Certificate of Service

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Scott W. Kelley  
Kelly Bauersfeld Lowry & Kelley, LLP  
6320 Canoga Ave., Suite 1650  
Woodland Hills, CA 91367

  
\_\_\_\_\_  
Robert Ryan Morishita  
Attorney for Applicant

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

KATHRYN SHAFFER,	)	In Re Application of
Opposer,	)	KLEEVCO PRODUCTIONS
	)	U.S. Trademark Ser. No. 78/206,862
v.	)	Published: October 7, 2003
	)	Mark: KAYLA KLEEVAGE
KLEEVCO PRODUCTIONS,	)	
Applicant.	)	
	)	Opposition No. 91158169
_____	)	

OPPOSER'S FIRST SET OF REQUESTS FOR DOCUMENTS AND THINGS

Pursuant to Rule 34 of the Federal Rules of Civil Procedure and the provisions of 37 CFR § 2.120, Opposer KATHRYN SHAFFER ("Opposer") hereby requests Applicant KLEEVCO PRODUCTIONS ("Applicant") to produce the documents and things that are responsive to the following requests. Applicant shall provide its "Production of Documents" within thirty (30) days of the date of service hereof, and produce the documents requested, at 10 a.m. on January 9, 2004 at the offices of Applicant's counsel Kelly Bauersfeld Lowry & Kelley, LLP., 6320 Canoga Avenue, Suite 1650, Woodland Hills, California 91367.

INSTRUCTIONS AND DEFINITIONS

As used herein, unless otherwise made clear by the context, the following instructions and definitions shall apply to the requests/interrogatories set forth herein:

- A. The term "Opposer" refers to KATHRYN SHAFFER.
- B. The term "Applicant" refers to and includes KLEEVCO PRODUCTIONS, and all or each of its directors, officers, employees, agents, representatives, attorneys, owners, shareholders, previous owners, predecessors-in-interest, parents, subsidiaries, affiliates, and persons, organizations



or corporations in active concert or participation with all or each of them, and any other person acting or purporting to act on behalf of all or each of them.

C. The term "person" includes not only natural persons, but also, without limitation, firms, partnerships, associations, corporations, fictitious business name (d/b/a) entities and other legal entities, and divisions, departments or other units thereof.

D. The term "communications" means all forms of information exchange, whether written, oral, by telephone, telex, facsimile, electronic mail, or other mode of transmission.

E. Whenever the identification of a person is requested, such identification shall include:

- (1) The full name or designation of the person;
- (2) The present or last known residential address of the person;
- (3) The present or last known business affiliation including the business address and position held by said person; and
- (4) Where applicable, the person's position or title and the address of his place of employment or business during the time period to which the interrogatory / request relates.

F. Whenever the identification of "communications" is requested, state:

- (1) Whether the communication was oral or written;
- (2) The date of the communication;
- (3) The place of the communication;
- (4) The substance of the communication with specificity; and
- (5) Identify all persons involved in the communication.

G. The term "document" is used in a comprehensive and broad sense and includes, without limitation, the original and any copy of all writings, correspondence, books, memoranda, invoices, contracts, purchase orders, receipts, pamphlets, brochures, magazines, publications, studies, photographs, slides, videotapes, films, artwork, drawings, sketches, illustrative material, circulars, price lists, advertisements, promotional materials, packaging and labels, point-of-sale displays, layouts, tear sheets, magnetic recording tapes, microfilms and other storage means by which information is retained in retrievable form, and all other material whether printed, typewritten,

handwritten, recorded or reproduced by any process, including drafts, copies or reproductions thereof now or formerly in the possession, custody or control of Applicant, or at any time in the possession, custody or control of any representative, agent, affiliate, predecessor or successor of Applicant.

H. Whenever it is requested that you "identify" a document, please furnish the following information as to each:

- (1) The full name and present or last known residence address of the author;
- (2) The author's present or last known affiliation with or relationship to Applicant, if any;
- (3) The date of the document;
- (4) The general nature of the document, i.e., a letter, a memorandum, a pamphlet, a report, etc.;
- (5) The general subject matter of the document;
- (6) The name and address of each recipient of a copy of the document;
- (7) The name and address of the person now having possession of the original and the location of the original, or if this information is not presently known to Applicant, the name and address of each person known to Applicant now having possession of a copy and of the present location of each such copy;
- (8) For each document which Applicant contends is privileged or otherwise excludable from discovery, the basis for such claim or privilege or other ground for exclusion;
- (9) If such document was, but no longer is in Applicant's possession or subject to its control, state whether it is missing or lost, has been destroyed, has been transferred voluntarily or involuntarily to others, or otherwise disposed of, and in each instance explain the circumstances surrounding the authorization for such disposition.

I. Whenever the identification of a document is requested, in lieu of identification as above, Applicant may produce such document or a clear and legible copy of the same, suitably labeled.

J. Each interrogatory/request shall be interpreted broadly in order to bring within its scope all responses which might otherwise be construed to be outside its scope. In this spirit, as used herein, “and” as well as “or” shall be construed disjunctively or conjunctively as necessary, the singular includes the plural, and the masculine includes the feminine and the neuter.

K. The words “describe”, “describe in detail” and/or “specify” mean that Applicant is requested to state with specificity each and every fact, ultimate fact, particular circumstance, incident, act, omission, detail, event and date, and to identify each and every document and person as herein defined relating thereto, or in any way whatsoever concerning the matters inquired of.

L. The terms “relate” or “relating to” shall be interpreted in their broadest sense in order to bring within their scope all responses which might otherwise be construed to be outside their scope, and in this spirit, these terms shall mean and include referring to, pertaining to, alluding to, concerning, involving, evidencing, showing, describing, reflecting, constituting, regarding, mentioning, analyzing, surrounding, about, connected with, or having any factual or legal relationship whatsoever to the subject matter in question.

M. These interrogatories/requests shall be deemed to be continuing, so that if Applicant, after answering or responding, may acquire additional knowledge or information which enlarges, diminishes or otherwise modifies such answers or responses, Applicant is requested promptly thereafter to serve supplemental answers or responses reflecting such knowledge or information.

N. These requests/interrogatories require the production of documents and things in the same form and order in which they existed prior to production in the usual course of business. Documents are to be produced in the boxes, file folders, bindings or other containers in which the documents are found. Titles, labels or other descriptions of the boxes, file folders, bindings or other containers are to be left in tact. Whenever it is reasonably practicable, documents and things requested herein shall be organized and labeled to correspond with the categories in the request(s) to which they are responsive.

O. Should Applicant deem any document or thing requested herein to be privileged against production on attorney-client, work product, or any other ground, please provide a list of all such

documents and things, over the signature of counsel, stating as to each document or thing the following information:

- (1) The type of document or thing (e.g., letter, notebook, etc.);
- (2) The date prepared or sent, as accurately as is known;
- (3) Its authors;
- (4) All actual recipients of the document or thing and of each copy, whether indicated on the document or not;
- (5) A summary of the subject matter and purpose of the document or thing sufficient to show whether the document or thing is privileged;
- (6) The caption and location of the file in which the document or thing was found or is kept and the name and address of the custodian thereof; and
- (7) A statement of the nature of the privilege claimed and the basis for claiming the privilege as to such document or thing.

P. For each document or thing requested, please produce the original and each copy which differs in any manner from the original.

Q. If you chose in accordance with Rule 33(c) of the Federal Rules of Civil Procedure to answer any Interrogatory by providing Opposer a reasonable opportunity to inspect the records, then you shall identify each document you intend to provide, and state the basis for your contention that the burden of deriving or ascertaining the answer from your records is substantially the same for Opposer as for you.

R. The term "KAT KLEEVAGE" refers to Opposer's mark referred to in its Notice of Opposition.

S. The term "KAYLA KLEEVAGE" refers to Applicant's mark which is the subject of U.S. Trademark Application Serial No. 78/206,862.

T. When responding to the interrogatories/requests set forth herein, in connection with Applicant's activities (e.g., use, sale, advertising, etc.) relating to the KAYLA KLEEVAGE Mark, Applicant is instructed and requested to limit its responses to its activities in the United States of America.

U. The term "Answer" refers to the Answer of Applicant KLEEVCO PRODUCTIONS to Opposer's Notice of Opposition.

REQUESTS FOR PRODUCTION

1. All documents included in the prosecution file histories of Applicant's U.S. Trademark Application Serial No. 78/206,862, including any communication between Applicant and the United States Patent and Trademark Office at any time since the filing of the application.

2. All documents which include any reference to Opposer's KAT KLEEVAGE mark.

3. All documents which Applicant will introduce or intends to introduce into evidence in this Opposition.

4. Each document which contains any reference to potential conflict between Applicant's KAYLA KLEEVAGE mark and Opposer's KAT KLEEVAGE mark..

5. Examples of each use, intended use or planned use of Applicant's KAYLA KLEEVAGE mark, (e.g. tags, labels, packaging, advertising or other printed electronic media materials) used by or on behalf of Applicant.

6. Examples of each variety of print media advertisements, including each catalog, brochure, advertisement or piece of commercial material used, intended to be used, or planned to be used by Applicant in advertising Applicant's products or services under Applicant's KAYLA KLEEVAGE Mark.

7. Examples of each electronic media goods and services or advertisements used, intended to be used, or planned to be used by Applicant under Applicant's KAYLA KLEEVAGE mark.

8. All documents and things relating to Applicant's annual advertising expenditures in the United States for all products sold under each the KAYLA KLEEVAGE Mark since Applicant's date of first use in commerce to the present.

9. All documents which set forth, establish, or substantiate the date of first use and first use in interstate commerce of Applicant's KAYLA KLEEVAGE Mark, in connection with Applicant's goods or services.

10. If the use of Applicant's KAYLA KLEEVAGE Mark has been continuous since the date of first use, documents by which such continuous use can be established.

11. All documents relating to any search conducted by or for Applicant to determine the availability of Applicant's KAYLA KLEEVAGE Mark for registration in the United States Patent & Trademark Office, or in any foreign country.

12. All documents relating to all licenses, assignments or any other agreements involving Applicant's KAYLA KLEEVAGE Mark.

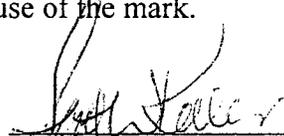
13. All documents and things the identification of which is requested in Opposer's First Set of Interrogatories, and which is or should be identified by Applicant in response to such Interrogatories.

14. All documents which in any way support or relate to Applicant's Answer to Opposer's Notice of Opposition.

15. All documents relating to Applicant's selection, adoption, and use, including its first use and first use in commerce of the KAYLA KLEEVAGE Mark.

16. All documents regarding the geographical areas and channels of trade and distribution of goods and services offered by Applicant that bear the mark KAYLA KLEEVAGE, including representative samples of use of the mark.

Dated: 10 DEC 2003



Scott W. Kelley, Esq.  
KELLY BAUERSFELD LOWRY & KELLEY, LLP  
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Woodland Hills, California 91367  
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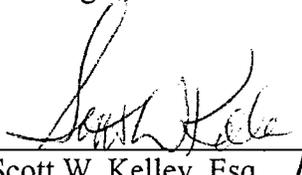
Attorneys for Opposer  
KATHRYN SHAFFER

CERTIFICATE OF SERVICE

As counsel for Applicant, I hereby certify that I caused a true and correct copy of the attached OPPOSER'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS (In Re TTAB Opposition No. 91158169) to be served on this date via U.S. first class mail, postage prepaid, upon counsel for Applicant:

Robert Ryan Morishita  
2725 S. Jones Blvd., Suite 102  
Las Vegas, NV 89146

Dated: December 10, 2003



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Scott W. Kelley, Esq.  
KELLY BAUERSFELD LOWRY & KELLEY, LLP  
Attorneys for Opposer  
KATHRYN SHAFFER

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

KATHRYN SHAFFER,	)	In Re Application of
Opposer,	)	KLEEVCO PRODUCTIONS
	)	U.S. Trademark Ser. No. 78/206,862
v.	)	Published: October 7, 2003
	)	Mark: KAYLA KLEEVAGE
KLEEVCO PRODUCTIONS,	)	
Applicant.	)	Opposition No. 91158169
	)	
	)	

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OPPOSER'S FIRST SET OF INTERROGATORIES

Pursuant to Rule 33 of the Federal Rules of Civil Procedure and the provisions of 37 CFR § 2.120, Opposer KATHRYN SHAFFER ("Opposer") hereby requests Applicant KLEEVCO PRODUCTIONS, ("Applicant") to answer under oath the interrogatories set forth below. Applicant shall provide its written responses to the Interrogatories within thirty (30) days of the date of service hereof, and produce the documents requested, at 10 a.m. on January 9, 2004 at the offices of Opposer's counsel Kelly Bauersfeld Lowry & Kelley, LLP., 6320 Canoga Avenue, Suite 1650, Woodland Hills, California 91367.

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- B. The term "Applicant" refers to and includes KLEEVCO PRODUCTIONS, and all or each of its directors, officers, employees, agents, representatives, attorneys, owners, shareholders,



previous owners, predecessors-in-interest, parents, subsidiaries, affiliates, and persons, organizations or corporations in active concert or participation with all or each of them, and any other person acting or purporting to act on behalf of all or each of them.

C. The term "person" includes not only natural persons, but also, without limitation, firms, partnerships, associations, corporations, fictitious business name (d/b/a) entities and other legal entities, and divisions, departments or other units thereof.

D. The term "communications" means all forms of information exchange, whether written, oral, by telephone, telex, facsimile, electronic mail, or other mode of transmission.

E. Whenever the identification of a person is requested, such identification shall include:

- (1) The full name or designation of the person;
- (2) The present or last known residential address of the person;
- (3) The present or last known business affiliation including the business address and position held by said person; and
- (4) Where applicable, the person's position or title and the address of his place of employment or business during the time period to which the interrogatory / request relates.

F. Whenever the identification of "communications" is requested, state:

- (1) Whether the communication was oral or written;
- (2) The date of the communication;
- (3) The place of the communication;
- (4) The substance of the communication with specificity; and
- (5) Identify all persons involved in the communication.

G. The term "document" is used in a comprehensive and broad sense and includes, without limitation, the original and any copy of all writings, correspondence, books, memoranda, invoices, contracts, purchase orders, receipts, pamphlets, brochures, magazines, publications, studies, photographs, slides, videotapes, films, artwork, drawings, sketches, illustrative material, circulars, price lists, advertisements, promotional materials, packaging and labels, point-of-sale displays, layouts, tear sheets, magnetic recording tapes, microfilms and other storage means by which

information is retained in retrievable form, and all other material whether printed, typewritten, handwritten, recorded or reproduced by any process, including drafts, copies or reproductions thereof now or formerly in the possession, custody or control of Applicant, or at any time in the possession, custody or control of any representative, agent, affiliate, predecessor or successor of Applicant.

H. Whenever it is requested that you "identify" a document, please furnish the following information as to each:

- (1) The full name and present or last known residence address of the author;
- (2) The author's present or last known affiliation with or relationship to Applicant, if any;
- (3) The date of the document;
- (4) The general nature of the document, i.e., a letter, a memorandum, a pamphlet, a report, etc.;
- (5) The general subject matter of the document;
- (6) The name and address of each recipient of a copy of the document;
- (7) The name and address of the person now having possession of the original and the location of the original, or if this information is not presently known to Applicant, the name and address of each person known to Applicant now having possession of a copy and of the present location of each such copy;
- (8) For each document which Applicant contends is privileged or otherwise excludable from discovery, the basis for such claim or privilege or other ground for exclusion;
- (9) If such document was, but no longer is in Applicant's possession or subject to its control, state whether it is missing or lost, has been destroyed, has been transferred voluntarily or involuntarily to others, or otherwise disposed of, and in each instance explain the circumstances surrounding the authorization for such disposition.

I. Whenever the identification of a document is requested, in lieu of identification as above, Applicant may produce such document or a clear and legible copy of the same, suitably labeled.

J. Each interrogatory/request shall be interpreted broadly in order to bring within its scope all responses which might otherwise be construed to be outside its scope. In this spirit, as used herein, "and" as well as "or" shall be construed disjunctively or conjunctively as necessary, the singular includes the plural, and the masculine includes the feminine and the neuter.

K. The words "describe", "describe in detail" and/or "specify" mean that Applicant is requested to state with specificity each and every fact, ultimate fact, particular circumstance, incident, act, omission, detail, event and date, and to identify each and every document and person as herein defined relating thereto, or in any way whatsoever concerning the matters inquired of.

L. The terms "relate" or "relating to" shall be interpreted in their broadest sense in order to bring within their scope all responses which might otherwise be construed to be outside their scope, and in this spirit, these terms shall mean and include referring to, pertaining to, alluding to, concerning, involving, evidencing, showing, describing, reflecting, constituting, regarding, mentioning, analyzing, surrounding, about, connected with, or having any factual or legal relationship whatsoever to the subject matter in question.

M. These interrogatories/requests shall be deemed to be continuing, so that if Applicant, after answering or responding, may acquire additional knowledge or information which enlarges, diminishes or otherwise modifies such answers or responses, Applicant is requested promptly thereafter to serve supplemental answers or responses reflecting such knowledge or information.

N. These requests/interrogatories require the production of documents and things in the same form and order in which they existed prior to production in the usual course of business. Documents are to be produced in the boxes, file folders, bindings or other containers in which the documents are found. Titles, labels or other descriptions of the boxes, file folders, bindings or other containers are to be left in tact. Whenever it is reasonably practicable, documents and things requested herein shall be organized and labeled to correspond with the categories in the request(s) to which they are responsive.

O. Should Applicant deem any document or thing requested herein to be privileged against production on attorney-client, work product, or any other ground, please provide a list of all such documents and things, over the signature of counsel, stating as to each document or thing the following information:

- (1) The type of document or thing (e.g., letter, notebook, etc.);
- (2) The date prepared or sent, as accurately as is known;
- (3) Its authors;
- (4) All actual recipients of the document or thing and of each copy, whether indicated on the document or not;
- (5) A summary of the subject matter and purpose of the document or thing sufficient to show whether the document or thing is privileged;
- (6) The caption and location of the file in which the document or thing was found or is kept and the name and address of the custodian thereof; and
- (7) A statement of the nature of the privilege claimed and the basis for claiming the privilege as to such document or thing.

P. For each document or thing requested, please produce the original and each copy which differs in any manner from the original.

Q. If you chose in accordance with Rule 33( c) of the Federal Rules of Civil Procedure to answer any Interrogatory by providing Opposer a reasonable opportunity to inspect the records, then you shall identify each document you intend to provide, and state the basis for your contention that the burden of deriving or ascertaining the answer from your records is substantially the same for Opposer as for you.

R. The term "KAT KLEEVAGE" refers to Opposer's mark referred to in its Notice of Opposition.

S. The term "KAYLA KLEEVAGE" refers to Applicant's mark which is the subject of U.S. Trademark Application Serial No. 78/206,862.

T. When responding to the interrogatories/requests set forth herein, in connection with Applicant's activities (e.g., use, sale, advertising, etc.) relating to the KAYLA KLEEVAGE Mark,

Applicant is instructed and requested to limit its responses to its activities in the United States of America.

U. The term "Answer" refers to the Answer of Applicant KLEEVCO PRODUCTIONS to Opposer's Notice of Opposition.

INTERROGATORIES

1. Describe in detail the circumstances surrounding KLEEVO PRODUCTIONS first use and first use in commerce of the KAYLA KLEEVAGE mark.
2. Identify all contracts, licenses and other documents that relate to the authorization to use the KAYLA KLEEVAGE mark.
3. Identify all trademark applications, domestic and foreign, assigned to, or are subject to a duty to be assigned to, or are otherwise assigned by Applicant and that seeks registration of the KAYLA KLEEVAGE mark.
4. Identify the person at Kleevo Productions that is most knowledgeable about Kleevo Productions' use of the KAYLA KLEEVAGE mark.
5. Identify the person at Kleevo Productions that is most knowledgeable about the facts and defenses asserted in Applicant's Answer.
6. Describe whether or not Applicant has been continuously (without interruption) using in commerce the KAYLA KLEEVAGE mark since the date of first use to the present.
7. Describe whether there has been any period(s) of interruption of more than six (6) months in Applicant's use in commerce of the KAYLA KLEEVAGE mark since the date of first use to the present, identify all relevant documents, and identify all individuals with knowledge of such interruption(s).
8. Describe in detail the channels of trade and distribution of each product or service sold or intended to be sold under the KAYLA KLEEVAGE mark, identify all documents relating thereto and identify all individuals having relevant knowledge.
9. Describe in detail the manner of advertising, the advertising media, and advertising agencies through which Applicant has advertised or is advertising all products sold or marketed

under the KAYLA KLEEVAGE mark. Identify all documents relating thereto and identify all individuals having relevant knowledge.

10. Identify the retailers, wholesalers, mail order suppliers, Internet web-sites, distributors and all other suppliers/sellers in the United States that sell or offer for sale Applicant's services or products under the KAYLA KLEEVAGE mark, and for each such entity, describe the relationship between that entity and Applicant, and identify the individual(s) who manages or who is in charge of the operations of such entity.

11. Specify the current retail and wholesale prices of all products and services sold under Applicant's KAYLA KLEEVAGE mark, and since Applicant's first date of use in commerce of this mark to the present, specify Applicant's annual unit and dollar volume sales in the United States of all such products and services, identify all documents relating thereto and identify all individuals having relevant knowledge.

12. Since Applicant's first date of use in commerce of the KAYLA KLEEVAGE mark to the present, specify Applicant's annual advertising expenditures in the United States for all products sold under this mark, identify all documents relating thereto, and identify all individuals having relevant knowledge.

13. Identify all individuals who are responsible for, or who participated in the creation, selection and adoption of Applicant's KAYLA KLEEVAGE mark, and identify all documents relating thereto.

14. Identify the date of Applicant's first knowledge or Opposer, and describe the circumstances of Applicant acquiring such knowledge, identify all documents relating thereto and identify all individuals having relevant knowledge.

15. Describe Applicant's knowledge of all third party names, trademark, service marks, logos, or designations that include the terms "KLEEVAGE", or a phonetic equivalent thereto, identify all documents relating thereto and identify all individuals having relevant knowledge.

16. Describe any searches, investigations, surveys, analysis, or studies ever conducted by or for Applicant relating to the KAYLA KLEEVAGE mark, or any other name, trademark, service mark or designation that includes the term "KLEEVAGE" or a phonetic equivalent to as an

element thereof, identify all documents relating thereto and identify all individuals having relevant knowledge.

17. Describe and identify any dispute, accusation, allegation of infringement, threats of litigation, or actual litigation, brought by or against Applicant at any time relating to the use and/or registration or attempt to register any name or trademark that includes the "KLEEVAGE" as an element, identify all documents relating thereto, and identify all individuals having relevant knowledge.

18. Indicate each state, county or city (including the District of Columbia) in the United States, its territories and possessions, by each calendar year, in which Applicant has sold, offered for sale, advertised or distributed any product or service under or in connection with the KAYLA KLEEVAGE mark.

19. Identify each item of printed matter, including each different label, tag, wrapper, container, advertisement, brochure, sign and the like, which contains or bear the KAYLA KLEEVAGE mark in any manner or form.

20. Identify all information regarding any inquiry, survey, poll, credit check or other investigation conducted or caused to be conducted by Applicant which involved Opposer, Opposer's business or Opposer's mark.

21. Identify each and every person whom the Applicant intends to call as a witness, including expert witnesses, and for each witness describe the nature of his or her expected testimony, including the identification of all documents which each witness is about to testify.

22. Identify and state in detail the basis, including all facts and evidence in support thereof, for Applicant's Answer, and any claim upon which Applicant intends to rely upon in support of its case, and all documents relating thereto.

23. Identify all trade shows, conferences, or other industry gatherings at which Applicant has displayed or plans to display products or promotional materials bearing the KAYLA KLEEVAGE mark.

24. Indicate the meaning or commercial impression imparted by each term of the KAYLA KLEEVAGE mark.

25. Explain the apparent contradiction in paragraphs 8 and 9 of Applicant's Answer stating that the mark KAYLA KLEEVAGE has been used since 1991 and 1996 respectively, and the intent-to-use basis listed in the United States Trademark Application Serial No. 78/206,862.

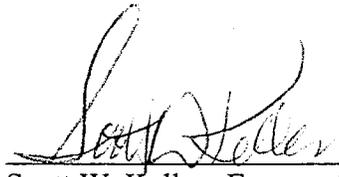
26. Identify any usage of the term "KLEEVAGE", or phonetic equivalent thereto, before Applicant's first use of the term in the adult entertainment industry.

27. Identify all users of the term KLEEVAGE, KLEAVAGE, or/and CLEAVAGE by third parties since the date of first use of KAYLA KLEEVAGE by Applicant, identify all documents relating thereto and identify all individuals having relevant knowledge.

28. For each and every interrogatory, identify the individual or individuals answering the interrogatory and each person who provided any information including opinion, advice, reports, studies or facts on which any of the foregoing interrogatories was based, specifying each interrogatory to which he or she contributed information.

December 10, 2003

Date



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Scott W. Kelley, Esq.  
Kelly Bauersfeld Lowry & Kelley, LLP  
6320 Canoga Ave., Suite 1650  
Woodland Hills, CA 91367  
Fax: (818) 340-2859

Attorneys for Opposer  
Kathryn Shaffer

**CERTIFICATE OF SERVICE**

As counsel for Opposer, I hereby certify that I caused a true and correct copy of the attached OPPOSER'S FIRST SET OF INTERROGATORIES (In Re TTAB Opposition No. 91158169) to be served on this date via U.S. first class mail, postage prepaid, upon counsel for Applicant:

Robert Ryan Morishita  
2725 S. Jones Blvd., Suite 102  
Las Vegas, NV 89146

Dated: December 10, 2003



---

Scott W. Kelley, Esq.  
KELLY BAUERSFELD LOWRY & KELLEY, LLP  
Attorneys for Opposer  
Kathryn Shaffer

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

In the Matter of Trademark Application Serial No. 78/206,862  
For the mark KAYLA KLEEVAGE  
Published in the *Official Gazette* on October 7, 2003

_____		)
Kathryn Shaffer,		)
		)
Opposer,		)
		)
v.		)
		)
Kleevco Productions		)
		)
Applicant.		)
_____		)

Opposition No. 91158169

Applicant's Responses to  
Opposer's First Set of  
Interrogatories

**APPLICANT'S RESPONSES TO OPPOSER'S FIRST SET OF INTERROGATORIES**

**INTERROGATORY NO. 1**

Describe in detail the circumstances surrounding KLEEVO PRODUCTIONS first use and first use in commerce of the KAYLA KLEEVAGE mark.

**RESPONSE**

Applicant first used the mark KAYLA KLEEVAGE for "personal appearances by a celebrity adult entertainer" on or about March 25, 1991. Applicant first used the mark KAYLA KLEEVAGE in commerce for "personal appearances by a celebrity adult entertainer" on or about March 25, 1991. The mark was used in newspaper advertisements to identify and promote a personal appearance by Applicant's owner from March 25, 1991 to March 30, 1991 at Giorgio's of S.A.

Applicant first used the mark KAYLA KLEEVAGE for "providing live adult



entertainment pictures and performances via the web” on or about July 29, 1996. Applicant first used the mark KAYLA KLEEVAGE in commerce for “providing live adult entertainment pictures and performances via the web” on or about July 29, 1996. The mark was used on a website located at <http://www.kleevage.com> created on or about July 29, 1996.

INTERROGATORY NO. 2

Identify all contracts, licenses and other documents that relate to the authorization to use the KAYLA KLEEVAGE mark.

RESPONSE

Based upon a reasonable investigation, Applicant has identified no documents responsive to this Interrogatory.

INTERROGATORY NO. 3

Identify all trademark applications, domestic and foreign, assigned to, or are subject to a duty to be assigned to, or are otherwise assigned by Applicant and that seeks registration of the KAYLA KLEEVAGE mark.

RESPONSE

U.S. Trademark App. Ser. No. 78/206,862. The mark KAYLA KLEEVAGE-KLEEVCO PRODUCTIONS is also the subject of a Record of Persons Operating under Assumed Name in Harris County, Texas, filed and granted June 14, 1991.

INTERROGATORY NO. 4

Identify the person at Kleeveco Productions that is most knowledgeable about Kleeveco Productions’ use of the KAYLA KLEEVAGE mark.

RESPONSE

Kimberlee Port, owner, Kleeveco Productions, 8635 W. Sahara Ave., Las Vegas, NV  
89117, (702) 240-2563.

John Port, photographer, Kleeveco Productions, 8635 W. Sahara Ave., Las Vegas, NV  
89117, (702) 240-2563.

INTERROGATORY NO. 5

Identify the person at Kleeveco Productions that is most knowledgeable about the facts and defenses asserted in Applicant's Answer.

RESPONSE

Kimberlee Port and John Port identified in response to Interrogatory No. 3 above.

INTERROGATORY NO. 6

Describe whether or not Applicant has been continuously (without interruption) using in commerce the KAYLA KLEEVAGE mark since the date of first use to the present.

RESPONSE

Applicant objects to this Interrogatory as being vague and ambiguous as not defining "interruption." Applicant further objects to this Interrogatory as being overbroad as not being limited to the services "providing live adult entertainment pictures and performances via the web" and "personal appearances by a celebrity adult entertainer." Subject to this objection and based upon a reasonable investigation, Applicant has "been continuously (without interruption) using in commerce the KAYLA KLEEVAGE mark since the date of first use to the present" with respect to the services identified in the subject trademark application.

INTERROGATORY NO. 7

Describe whether there has been any period(s) of interruption of more than six (6)

months in Applicant's use in commerce of the KAYLA KLEEVAGE mark since the date of first use to the present, identify all relevant documents, and identify all individuals with knowledge of such interruption(s).

#### RESPONSE

Applicant objects to this Interrogatory as being vague and ambiguous as not defining "interruption." Applicant further objects to this Interrogatory as being overbroad as not being limited to the services "providing live adult entertainment pictures and performances via the web" and "personal appearances by a celebrity adult entertainer." Subject to this objection and based upon a reasonable investigation, Applicant has identified no interruptions of more than six (6) months in Applicant's use of the KAYLA KLEEVAGE mark with respect to the services identified in the subject trademark application.

#### INTERROGATORY NO. 8

Describe in detail the channels of trade and distribution of each product or service sold or intended to be sold under the KAYLA KLEEVAGE mark, identify all documents relating thereto and identify all individuals having relevant knowledge.

#### RESPONSE

Applicant objects to the Interrogatory as being vague, ambiguous, and overbroad. Applicant has applied to register the mark KAYLA KLEEVAGE for the services "providing live adult entertainment pictures and performances via the web" and "personal appearances by a celebrity adult entertainer." Therefore, the channels of trade of any other goods or services are irrelevant to this Opposition.

Subject to this objection and based upon a reasonable investigation, Applicant's services of "providing live adult entertainment pictures and performances via the web" identified by the

mark KAYLA KLEEVAGE are distributed via the Internet at the website found at <http://www.kaylakleevage.com> and its aliases found at [kleevage.com](http://kleevage.com), [kaylakleevage.net](http://kaylakleevage.net), [kaylakleevage.com](http://kaylakleevage.com), [kleevage.net](http://kleevage.net), [kaylakleevage.tv](http://kaylakleevage.tv), and [kleevage.tv](http://kleevage.tv). Documents pertaining to this use are produced in response to the Document Requests. Individuals most knowledgeable are Kimberlee Port and John Port identified in response to Interrogatory No. 3 above.

Subject to this objection and based upon a reasonable investigation, Applicant's services of "personal appearances by a celebrity adult entertainer" identified by the mark KAYLA KLEEVAGE are distributed at adult clubs and trade shows. Documents pertaining to this use are produced in response to the Document Requests. Individuals most knowledgeable are Kimberlee Port and John Port identified in response to Interrogatory No. 3 above.

#### INTERROGATORY NO. 9

Describe in detail the manner of advertising, the advertising media, and advertising agencies through which Applicant has advertised or is advertising all products sold or marketed under the KAYLA KLEEVAGE mark. Identify all documents relating thereto and identify all individuals having relevant knowledge.

#### RESPONSE

Applicant objects to the Interrogatory as being vague, ambiguous, and overbroad. Applicant has applied to register the mark KAYLA KLEEVAGE for the services "providing live adult entertainment pictures and performances via the web" and "personal appearances by a celebrity adult entertainer." Therefore, the manner of advertising of any other goods or services is irrelevant to this Opposition.

Subject to the objection and based upon a reasonable investigation, Applicant's services of "providing live adult entertainment pictures and performances via the web" identified by the

mark KAYLA KLEEVAGE are advertised on the website at <http://www.kaylakleevage.com> and its aliases found at [kleevage.com](http://kleevage.com), [kaylakleevage.net](http://kaylakleevage.net), [kayla-kleevage.com](http://kayla-kleevage.com), [kleevage.net](http://kleevage.net), [kaylakleevage.tv](http://kaylakleevage.tv), and [kleevage.tv](http://kleevage.tv), in online advertisements on other's websites, print advertisements distributed in adult magazine publications, and promotional materials distributed at personal appearances. Documents pertaining to this use are produced in response to the Document Requests. Individuals most knowledgeable are Kimberlee Port and John Port identified in response to Interrogatory No. 3 above.

Subject to the objection and based upon a reasonable investigation, Applicant's services of "personal appearances by a celebrity adult entertainer" identified by the mark KAYLA KLEEVAGE are advertised on the website at <http://www.kaylakleevage.com> and its aliases found at [kleevage.com](http://kleevage.com), [kaylakleevage.net](http://kaylakleevage.net), [kayla-kleevage.com](http://kayla-kleevage.com), [kleevage.net](http://kleevage.net), [kaylakleevage.tv](http://kaylakleevage.tv), and [kleevage.tv](http://kleevage.tv), in online advertisements on other's websites, print advertisements distributed in adult magazine publications and general circulation newspapers, posters at the location of the personal appearance, and promotional materials distributed at personal appearances. Documents pertaining to this use are produced in response to the Document Requests. Individuals most knowledgeable are Kimberlee Port and John Port identified in response to Interrogatory No. 3 above.

Subject to the objections, Applicant has used the advertising agency SLG Advertising, Greenwich Office Park Bldg. #2, Greenwich, CT 06831- 5115 to create and distribute print advertisements. Documents pertaining to these advertisements are produced in response to the Document Requests. Individuals most knowledgeable are Kimberlee Port and John Port identified in response to Interrogatory No. 3 above.

INTERROGATORY NO. 10

Identify the retailers, wholesalers, mail order suppliers, Internet web-sites, distributors and all other suppliers/sellers in the United States that sell or offer for sale Applicant's services or products under the KAYLA KLEEVAGE mark, and for each such entity, describe the relationship between that entity and Applicant, and identify the individual(s) who manages or who is in charge of the operations of such entity.

RESPONSE

Applicant objects to the Interrogatory as being vague, ambiguous, and overbroad. Applicant has applied to register the mark KAYLA KLEEVAGE for the services "providing live adult entertainment pictures and performances via the web" and "personal appearances by a celebrity adult entertainer." Therefore, the suppliers/sellers of any other goods or services are irrelevant to this Opposition.

Subject to the objection and based upon a reasonable investigation, Applicant's services of "providing live adult entertainment pictures and performances via the web" identified by the mark KAYLA KLEEVAGE are sold and offered for sale on the website at <http://www.kaylakleevage.com> and its aliases found at [kleevage.com](http://kleevage.com), [kaylakleevage.net](http://kaylakleevage.net), [kayla-kleevage.com](http://kayla-kleevage.com), [kleevage.net](http://kleevage.net), [kaylakleevage.tv](http://kaylakleevage.tv), and [kleevage.tv](http://kleevage.tv). The [kaylakleevage.com](http://kaylakleevage.com) website is operated by Applicant.

Subject to the objection and based upon a reasonable investigation, Applicant's services of "personal appearances by a celebrity adult entertainer" identified by the mark KAYLA KLEEVAGE are sold and offered for sale, since Applicant's first use of the mark, at the locations identified in documents produced in response to the Document Requests.

INTERROGATORY NO. 11

Specify the current retail and wholesale prices of all products and services sold under Applicant's KAYLA KLEEVAGE mark, and since Applicant's first date of use in commerce of this mark to the present, specify Applicant's annual unit and dollar volume sales in the United States of all such products and services, identify all documents relating thereto and identify all individuals having relevant knowledge.

RESPONSE

Applicant objects to the Interrogatory as being vague, ambiguous, and overbroad. Applicant has applied to register the mark KAYLA KLEEVAGE for the services "providing live adult entertainment pictures and performances via the web" and "personal appearances by a celebrity adult entertainer." Therefore, the prices and sales volume of any other goods or services are irrelevant to this Opposition.

Subject to the objections, the retail price of a membership for accessing Applicant's "pictures and performances via the web" at the website located at <http://www.kaylakleevage.com> is \$9.95 for thirty (30) days. Documents relating to the retail price of a membership to Applicant's website are produced in response to the Document Requests. The retail prices of Applicant's pictures are shown in documents produced in response to the Document Requests. Applicant's dollar sales volume for website memberships for May 28, 2000 through January 3, 2004 and for pictures and other products for January 1, 2001 through January 9, 2004 are shown in documents produced in response to the Document Requests.

Subject to the objections, the fee charged for "personal appearances by a celebrity adult entertainer" vary with respect to the venue and is considered confidential business or trade secret information. Applicant's annual dollar sales volume for personal appearances is considered

confidential business or trade secret information. Documents relating to Applicant's fees and dollar sales volume for personal appearances are considered confidential business or trade secret information. Therefore, Applicant objects to this Interrogatory. This information will be disclosed upon entry of a suitable protective order by the Trademark Trial and Appeal Board.

Individuals having knowledge are Kimberlee Port and John Port identified in response to Interrogatory No. 3 above.

#### INTERROGATORY NO. 12

Since Applicant's first date of use in commerce of the KAYLA KLEEVAGE mark to the present, specify Applicant's annual advertising expenditures in the United States for all products sold under this mark, identify all documents relating thereto, and identify all individuals having relevant knowledge.

#### RESPONSE

Applicant objects to the Interrogatory as being vague, ambiguous, and overbroad. Applicant has applied to register the mark KAYLA KLEEVAGE for the services "providing live adult entertainment pictures and performances via the web" and "personal appearances by a celebrity adult entertainer." Therefore, advertising expenditures for any other goods or services are irrelevant to this Opposition.

Additionally, Applicant's annual advertising expenditures are confidential business or trade secret information. Documents relating to Applicant's annual advertising expenditures are confidential business or trade secret information. Therefore, Applicant objects to this Interrogatory. Therefore, this information will be disclosed upon entry of a suitable protective order by the Trademark Trial and Appeal Board.

INTERROGATORY NO. 13

Identify all individuals who are responsible for, or who participated in the creation, selection and adoption of Applicant's KAYLA KLEEVAGE mark, and identify all documents relating thereto.

RESPONSE

Kimberlee Port and John Port identified in response to Interrogatory No. 3 above. Based upon a reasonable investigation, Applicant has identified no documents responsive to this Interrogatory.

INTERROGATORY NO. 14

Identify the date of Applicant's first knowledge of Opposer, and describe the circumstances of Applicant acquiring such knowledge, identify all documents relating thereto and identify all individuals having relevant knowledge.

RESPONSE

Applicant first became aware of Opposer in or about April 2002. Applicant became aware of Opposer through the website at <http://www.katkleevage.com>. Applicant objects to the Interrogatory as embracing documents and communications protected by the attorney-client and work product privileges inasmuch as the requested documents and communications could embrace opinion letters and attorney-client correspondence. Subject to this objection, documents to which the attorney-client privilege and attorney work product doctrine do not apply are produced in response to the Document Requests. Individuals having knowledge are Kimberlee Port and John Port identified in response to Interrogatory No. 3 above, and Robert Ryan Morishita, counsel for Applicant, Anderson & Morishita, L.L.C., 2725 S. Jones Blvd., Suite 102, Las Vegas, NV 89146, (702)222-2113.

INTERROGATORY NO. 15

Describe Applicant's knowledge of all third party names, trademark, service marks, logos, or designations that include the terms "KLEEVAGE", or a phonetic equivalent thereto, identify all documents relating thereto and identify all individuals having relevant knowledge.

RESPONSE

Applicant objects to the Interrogatory as being vague, ambiguous, and overbroad. Third party use of the word "KLEEVAGE" is irrelevant to this Opposition because Applicant has applied to register the mark KAYLA KLEEVAGE. Additionally, Applicant has applied to register the mark KAYLA KLEEVAGE for the services "providing live adult entertainment pictures and performances via the web" and "personal appearances by a celebrity adult entertainer." Therefore, third party use of the word "KLEEVAGE" without regard to industry is irrelevant to this Opposition.

Subject to this objection and based upon a reasonable investigation, Applicant identifies KAT KLEEVAGE, KATHI KLEEVAGE, and KELLY KLEEVAGE. Applicant objects to the Interrogatory as embracing documents and communications protected by the attorney-client and work product privileges inasmuch as the requested documents and communications could embrace opinion letters and attorney-client correspondence. Subject to this objection, documents to which the attorney-client privilege and attorney work product doctrine do not apply are produced in response to the Document Requests. Individuals having knowledge are Kimberlee Port and John Port identified in response to Interrogatory No. 3 above; Robert Ryan Morishita identified in response to Interrogatory No. 14 above; Kathryn Shaffer, 3230 E. Flamingo Rd., #324, Las Vegas, NV 89121; HardCore Hosting, 516 West Ash, Salina, KS 67401; Globe International, Inc., 244 Madison Ave., Suite 363, New York, NY 10016; Scott W.

Kelley, Kelly Bauersfeld Lowry & Kelley, LLP, 6320 Canoga Ave., Suite 1650, Woodland Hills, CA 91367; Kathie Brinkman, 13005 W. 104 St. N., Sedgwick, KS 67135; Kelly Kleevage, address unknown.

INTERROGATORY NO. 16

Describe any searches, investigations, surveys, analysis, or studies ever conducted by or for Applicant relating to the KAYLA KLEEVAGE mark, or any other name, trademark, service mark or designation that includes the term "KLEEVAGE" or a phonetic equivalent to as an element thereof, identify all documents relating thereto and identify all individuals having relevant knowledge.

RESPONSE

Applicant objects to the Interrogatory as being vague, ambiguous, and overbroad as not specifying a time or goods and services. Applicant further objects to the Interrogatory as embracing documents and communications protected by the attorney-client and work product privileges inasmuch as the requested documents and communications could embrace opinion letters and attorney-client correspondence.

Subject to these objections, and under the understanding that the Interrogatory is directed to clearance searches conducted prior to adoption of the mark KAYLA KLEEVAGE for the services recited in the subject trademark application, based upon a reasonable investigation, no search was conducted and Applicant has identified no documents responsive to this Interrogatory. Individuals having knowledge are Kimberlee Port and John Port identified in response to Interrogatory No. 3 above.

INTERROGATORY NO. 17

Describe and identify any dispute, accusation, allegation of infringement, threats of litigation, or actual litigation, brought by or against Applicant at any time relating to the use and/or registration or attempt to register any name or trademark that includes the "KLEEVAGE" as an element, identify all documents relating thereto, and identify all individuals having relevant knowledge.

RESPONSE

Applicant objects to the Interrogatory as embracing documents and communications protected by the attorney-client and work product privileges inasmuch as the requested documents and communications could embrace opinion letters and attorney-client correspondence. Subject to this objection, Applicant identifies KAT KLEEVAGE and documents to which the attorney-client privilege and attorney work product doctrine do not apply are produced in response to the Document Requests. Applicant directed a letter requesting Opposer cease use of the KAT KLEEVAGE mark and directed letters to HardCore Hosting and Globe International, Inc. Individuals having knowledge are Kimberlee Port and John Port identified in response to Interrogatory No. 3 above; Robert Ryan Morishita identified in response to Interrogatory No. 14 above; and Kathryn Shaffer, HardCore Hosting, Globe International, Inc., and Scott W. Kelley identified in response to Interrogatory No. 15 above.

Subject to the objection, Applicant identifies KATHI KLEEVAGE and documents to which the attorney-client privilege and attorney work product doctrine do not apply are produced in response to the Document Requests. Applicant directed a letter requesting Kathie Brinkman cease use of the KATHI KLEEVAGE mark. Individuals having knowledge are Kimberlee Port and John Port identified in response to Interrogatory No. 3 above; Robert Ryan Morishita

identified in response to Interrogatory No. 14 above; and Kathie Brinkman identified in response to Interrogatory No. 15 above.

Subject to the objection, Applicant identifies the Yahoo Group "KaylaKleevageTribute" and documents to which the attorney-client privilege and attorney work product doctrine do not apply are produced in response to the Document Requests. Applicant directed a letter requesting Yahoo Groups remove the aforementioned group. Individuals having knowledge are Kimberlee Port and John Port identified in response to Interrogatory No. 3 above.

#### INTERROGATORY NO. 18

Indicate each state, county or city (including the District of Columbia) in the United States, its territories and possessions, by each calendar year, in which Applicant has sold, offered for sale, advertised or distributed any product or service under or in connection with the KAYLA KLEEVAGE mark.

#### RESPONSE

Applicant objects to the Interrogatory as being vague, ambiguous, and overbroad. Applicant has applied to register the mark KAYLA KLEEVAGE for the services "providing live adult entertainment pictures and performances via the web" and "personal appearances by a celebrity adult entertainer." Therefore, the geographic distribution of any other goods or services are irrelevant to this Opposition.

Subject to this objection and based upon a reasonable investigation, Applicant's services of "providing live adult entertainment pictures and performances via the web" identified by the mark KAYLA KLEEVAGE are sold, offered for sale, advertised, and distributed over the Internet and, therefore, have been sold, offered for sale, advertised, or distributed in every state, county, and city (including the District of Columbia) in the United States, its territories and

possessions, every calendar year beginning on or about July 29, 1996.

Subject to the objection and based upon a reasonable investigation, Applicant's services of "personal appearances by a celebrity adult entertainer" identified by the mark KAYLA KLEEVAGE were sold, offered for sale, advertised, or distributed as follows:

1991-1995: Applicant was represented by Universal Entertainment, P.O. Box 210, Manville, NJ 08835, (908)704-7242. As part of this representation, Universal Entertainment distributed advertisements to venues in every state (including the District of Columbia) in the United States. Examples of these advertisements are produced in response to the Document Requests. Additionally, Applicant made personal appearances on nationally televised syndicated programs that were distributed in every state (including the District of Columbia) in the United States. Applicant also made personal appearances in the following locations:

1991: **United States:** Texas, Washington, California, Pennsylvania, Indiana, New Jersey, Florida, Alabama, Massachusetts, Connecticut, New York, Minnesota; **Canada:** Quebec, British Columbia, Ontario, Alberta; **England:** London.

1992: Applicant made personal appearances on nationally televised syndicated programs that were distributed in every state (including the District of Columbia) in the United States.

1993: **United States:** Missouri, Florida, Arizona, Rhode Island, Connecticut, California, South Carolina, Texas, Kansas, Iowa, Pennsylvania, Colorado, Ohio, Georgia, Tennessee, Alaska, New York; **Canada:** Ontario.

1994: **United States:** New York, Massachusetts, Florida, Virginia, Tennessee,

Rhode Island, Texas, Maryland, Iowa, Alabama, Pennsylvania, Ohio.

1995: **United States:** Texas, New York, Virginia, Rhode Island, Connecticut, Tennessee.

1996–present: Applicant’s services have been advertised over the Internet beginning on or about July 29, 1996 and, therefore, have been offered for sale and advertised in every state, county, and city (including the District of Columbia) in the United States, its territories and possessions, every calendar year since that time.

INTERROGATORY NO. 19

Identify each item of printed matter, including each different label, tag, wrapper, container, advertisement, brochure, sign and the like, which contains or bear the KAYLA KLEEVAGE mark in any manner or form.

RESPONSE

Applicant objects to the Interrogatory as being vague, ambiguous, and overbroad. Applicant has applied to register the mark KAYLA KLEEVAGE for the services “providing live adult entertainment pictures and performances via the web” and “personal appearances by a celebrity adult entertainer.” Therefore, printed matter without limitation to specific goods and services is irrelevant to this Opposition.

Subject to these objections, and under the understanding that the Interrogatory is directed to printed matter for the services recited in the subject trademark application, documents responsive to this Interrogatory are produced in response to the Document Requests.

INTERROGATORY NO. 20

Identify all information regarding any inquiry, survey, poll, credit check or other investigation conducted or caused to be conducted by Applicant which involved Opposer,

Opposer's business or Opposer's mark.

RESPONSE

Applicant objects to the Interrogatory as embracing documents and communications protected by the attorney-client and work product privileges inasmuch as the requested documents and communications could embrace opinion letters and attorney-client correspondence. Subject to this objection and based upon a reasonable investigation, Applicant has identified no documents responsive to this Interrogatory other than those already identified in response to Interrogatory No. 17 above.

INTERROGATORY NO. 21

Identify each and every person whom the Applicant intends to call as a witness, including expert witnesses, and for each witness describe the nature of his or her expected testimony, including the identification of all documents which each witness is about to testify.

RESPONSE

Kimberlee Port and John Port, identified in response to Interrogatory No. 3 above, regarding the adoption and use of the KAYLA KLEEVAGE mark, the public perception of the mark, the promotion of the mark by Applicant, use and public perception of the KAT KLEEVAGE mark, and telephone conversations with Opposer. The documents produced in response to the Document Requests.

Kathryn Shaffer identified in response to Interrogatory No. 15 above, regarding the adoption and use of the KAT KLEEVAGE mark, public perception and prior knowledge of the KAYLA KLEEVAGE mark, descriptiveness of the KAT KLEEVAGE and KAYLA KLEEVAGE marks, and the basis for filing the KAT KLEEVAGE trademark application. The documents produced in response to the Document Requests.

INTERROGATORY NO. 22

Identify and state in detail the basis, including all facts and evidence in support thereof, for Applicant's Answer, and any claim upon which Applicant intends to rely upon in support of its case, and all documents relating thereto.

RESPONSE

Applicant objects to this Interrogatory as premature since discovery has just commenced. Subject to this objection, Applicant's bases in answering the Notice of Opposition are that Opposer will be unable to prove that the mark KAYLA KLEEVAGE is merely descriptive of the services "providing live adult entertainment pictures and performances via the web" and "personal appearances by a celebrity adult entertainer" because the mark, as applied to those services is registrable as inherently distinctive. This was determined by the Examining Attorney during the examination of the subject trademark application. The mark KAYLA KLEEVAGE serves to identify the source of services rather than describe "providing live adult entertainment pictures and performances via the web" or "personal appearances by a celebrity adult entertainer."

Moreover, Applicant has used the mark KAYLA KLEEVAGE for "providing live adult entertainment pictures and performances via the web" since on or about September 22, 1996 and for "personal appearances by a celebrity adult entertainer" since on or before March 25, 1991. Thus, even if Opposer can prove that KAYLA KLEEVAGE is descriptive of "providing live adult entertainment pictures and performances via the web" and "personal appearances by a celebrity adult entertainer," and without admitting that the mark is merely descriptive of those services, Applicant's long and exclusive use of the mark KAYLA KLEEVAGE entitles Applicant to registration of the mark as having acquired distinctiveness. Applicant intends to

rely on documents and evidence produced in response to these Interrogatories, Opposer's First Set of Document Requests, and other documents and evidence developed through discovery.

INTERROGATORY NO. 23

Identify all trade shows, conferences, or other industry gatherings at which Applicant has displayed or plans to display products or promotional materials bearing the KAYLA KLEEVAGE mark.

RESPONSE

Applicant objects to the Interrogatory as being vague, ambiguous, and overbroad. Applicant has applied to register the mark KAYLA KLEEVAGE for the services "providing live adult entertainment pictures and performances via the web" and "personal appearances by a celebrity adult entertainer." Therefore, products or promotional materials without limitation to specific goods and services is irrelevant to this Opposition.

Subject to these objections, and under the understanding that the Interrogatory is directed to trade shows at which the services recited in the subject trademark application were performed, advertised, or promoted, Applicant identifies the following: NACS Show; AVN Adult Entertainment Expo; East Coast Video Show; Exotic Dancer 5th Annual Gentlemen's Club Owner's Expo; Winter Consumer Electronics Show 1997; Exotic Dancer Publications' Expo '98; 1998 International CES; Exotic Dancer Publications' Expo '99; 1999 International CES; Exotic Dancer Expo 2000; 2000 International CES; Exotic Dancer Expo 2001; Exotic Dancer Expo 2002; 2003 AVN Adult Entertainment Expo; 17th Annual VSDA Home Entertainment Convention & Exhibition; and 2004 AVN Adult Entertainment Expo.

INTERROGATORY NO. 24

Indicate the meaning or commercial impression imparted by each term of the KAYLA

KLEEVAGE mark.

RESPONSE

Applicant objects to the Interrogatory as being vague and ambiguous and as presuming that the mark is separable. Subject to the objections, the mark as a unitary whole is inherently distinctive as to “providing live adult entertainment pictures and performances via the web” and “personal appearances by a celebrity adult entertainer” by creating a unique commercial impression. The mark serves to identify an entertainer who is the source of such services.

INTERROGATORY NO. 25

Explain the apparent contradiction in paragraphs 8 and 9 of Applicant’s Answer stating that the mark KAYLA KLEEVAGE has been used since 1991 and 1996 respectively, and the intent-to-use basis listed in the United States Trademark Application Serial No. 78/206,862.

RESPONSE

There is no contradiction between Applicant’s filing for registration under 15 U.S.C. section 1051(b) and Applicant’s use commencing in 1991 for “personal appearances by a celebrity adult entertainer” and 1996 for “providing live adult entertainment pictures and performances via the web” because there is nothing in 15 U.S.C. section 1051(b) that prohibits seeking registration of a mark already in use. In fact, 15 U.S.C. section 1051(b)(3) expressly directs registration upon filing an amendment to allege use under 15 U.S.C. section 1051(c) or a statement of use under 15 U.S.C. section 1051(d) specifying the date of the applicant’s first use of the mark in commerce. Upon issuance of a notice of allowance, Applicant intends to file a statement of use under 15 U.S.C. section 1051(d).

INTERROGATORY NO. 26

Identify any usage of the term "KLEEVAGE", or phonetic equivalent thereto, before Applicant's first use of the term in the adult entertainment industry.

RESPONSE

Applicant objects to the Interrogatory as being vague, ambiguous, overbroad, and cumulative with Interrogatory No. 15. Use of the word "KLEEVAGE" is irrelevant to this Opposition because Applicant has applied to register the mark KAYLA KLEEVAGE. Moreover, the Interrogatory does not specify whether the uses sought are trademark or service mark uses and, if so, the goods and services identified thereby. Subject to the objections, Applicant has identified no uses other than those identified in response to Interrogatory No. 15.

INTERROGATORY NO. 27

Identify all users of the term KLEEVAGE, KLEAVAGE, or/and CLEAVAGE by third parties since the date of first use of KAYLA KLEEVAGE by Applicant, identify all documents relating thereto and identify all individuals having relevant knowledge.

RESPONSE

Applicant objects to this Interrogatory as being vague, ambiguous, overbroad, and cumulative with Interrogatory Nos. 15 and 26. Use of the word "KLEEVAGE," "KLEAVAGE," and/or "CLEAVAGE" is irrelevant to this Opposition because Applicant has applied to register the mark KAYLA KLEEVAGE. Moreover, the Interrogatory does not specify whether the uses sought are trademark or service mark uses and, if so, the goods and services identified thereby. Subject to the objections, Applicant has identified no users, documents, and individuals having knowledge other than those identified in response to Interrogatory Nos. 15 and 26.

INTERROGATORY NO. 28

For each and every interrogatory, identify the individual or individuals answering the interrogatory and each person who provided any information including opinion, advise, reports, studies or facts on which any of the foregoing interrogatories was based, specifying each interrogatory to which he or she contributed information.

RESPONSE

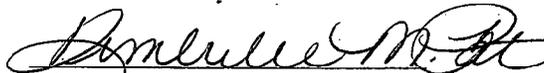
Interrogatory Nos. 1-28: Kimberlee Port identified in response to Interrogatory No. 3 above provided answers and facts upon which the responses were based.

Interrogatory Nos. 1-28: John Port identified in response to Interrogatory No. 3 above provided answers and facts upon which the responses were based.

Dated: Las Vegas, Nevada  
December 22, 2003

Respectfully submitted,

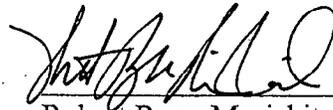
By:

  
Kimberlee Port  
Kleevco Productions

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Applicant's Responses to Opposer's First Set of Interrogatories was served on attorneys for Opposer on January 12, 2004 by First Class Mail, postage prepaid, as follows:

Scott W. Kelley  
KELLY BAUERSFELD LOWRY & KELLEY, LLP  
6320 Canoga Ave., Suite 1650  
Woodland Hills, CA 91367



---

Robert Ryan Morishita  
Attorney for Applicant

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

In the Matter of Trademark Application Serial No. 78/206,862  
For the mark KAYLA KLEEVAGE  
Published in the *Official Gazette* on October 7, 2003

_____	
Kathryn Shaffer,	)
	)
Opposer,	)
	)
v.	)
	)
Kleevco Productions	)
	)
Applicant.	)
_____	

Opposition No. 91158169

Applicant's Responses to  
Opposer's First Set of Requests  
for Documents and Things

**APPLICANT'S RESPONSES TO OPPOSER'S FIRST SET OF REQUESTS FOR  
DOCUMENTS AND THINGS**

REQUEST NO. 1

All documents included in the prosecution file histories of Applicant's U.S. Trademark Application Serial No. 78/206,862, including any communication between Applicant and the United States Patent and Trademark Office at any time since the filing of the application.

RESPONSE

Documents responsive to this Request are produced.



07-06-2004

U.S. Patent & TMO/TM Mail Rcpt Dt. #22

REQUEST NO. 2

All documents which include any reference to Opposer's KAT KLEEVAGE mark.

RESPONSE

Applicant objects to the Request as embracing documents and communications protected by the attorney-client and work product privileges inasmuch as the requested documents and

communications could embrace opinion letters and attorney-client correspondence. Subject to this objection, documents to which the attorney-client privilege and attorney work product doctrine do not apply are produced.

REQUEST NO. 3

All documents which Applicant will introduce or intends to introduce into evidence in this Opposition.

RESPONSE

Documents responsive to this Request are produced.

REQUEST NO. 4

Each document which contains any reference to potential conflict between Applicant's KAYLA KLEEVAGE mark and Opposer's KAT KLEEVAGE mark.

RESPONSE

Applicant objects to the Request as embracing documents and communications protected by the attorney-client and work product privileges inasmuch as the requested documents and communications could embrace opinion letters and attorney-client correspondence. Subject to this objection, documents to which the attorney-client privilege and attorney work product doctrine do not apply are produced in response to Document Request No. 2.

REQUEST NO. 5

Examples of each use, intended use or planned use of Applicant's KAYLA KLEEVAGE mark, (e.g. tags, labels, packaging, advertising or other printed electronic media materials) used by or on behalf of Applicant.

RESPONSE

Applicant objects to the Request as being vague, ambiguous, and overbroad. Applicant

has applied to register the mark KAYLA KLEEVAGE for the services “providing live adult entertainment pictures and performances via the web” and “personal appearances by a celebrity adult entertainer.” Therefore, examples of use for any other goods or services are irrelevant to this Opposition. Subject to this objection, and under the understanding that the Request is directed to the services identified in the subject trademark application, documents responsive to this Request are produced. Additional magazines, newspaper articles, feature videos, and videos of nationally syndicated television programs will be made available to Opposer for inspection and copying at a mutually agreeable time and place.

#### REQUEST NO. 6

Examples of each variety of print media advertisements, including each catalog, brochure, advertisement or piece of commercial material used, intended to be used, or planned to be used by Applicant in advertising Applicant’s products or services under Applicant’s KAYLA KLEEVAGE Mark.

#### RESPONSE

Applicant objects to the Request as being vague, ambiguous, and overbroad. Applicant has applied to register the mark KAYLA KLEEVAGE for the services “providing live adult entertainment pictures and performances via the web” and “personal appearances by a celebrity adult entertainer.” Therefore, examples of use for any other goods or services are irrelevant to this Opposition. Subject to this objection, and under the understanding that the Request is directed to the services identified in the subject trademark application, documents responsive to this Request are produced in response to Document Request No. 5.

#### REQUEST NO. 7

Examples of each electronic media goods and services or advertisements used, intended

to be used, or planned to be used by Applicant under Applicant's KAYLA KLEEVAGE mark.

RESPONSE

Under the understanding that the Request is directed to the "providing live adult entertainment pictures and performances via the web" services identified in the subject trademark application, documents responsive to this Request are produced in response to this Request and Document Request No. 5.

REQUEST NO. 8

All documents and things relating to Applicant's annual advertising expenditures in the United States for all products sold under each the KAYLA KLEEVAGE Mark since Applicant's date of first use in commerce to the present.

RESPONSE

Applicant's annual advertising expenditures are considered confidential business or trade secret information. Therefore, Applicant objects to this Request. The documents requested will be disclosed upon entry of a suitable protective order by the Trademark Trial and Appeal Board.

REQUEST NO. 9

All documents which set forth, establish, or substantiate the date of first use and first use in interstate commerce of Applicant's KAYLA KLEEVAGE Mark, in connection with Applicant's goods or services.

RESPONSE

Applicant objects to the Request as being vague, ambiguous, and overbroad. Applicant has applied to register the mark KAYLA KLEEVAGE for the services "providing live adult entertainment pictures and performances via the web" and "personal appearances by a celebrity adult entertainer." Therefore, documents relating to use for any other goods or services are

irrelevant to this Opposition. Subject to this objection, and under the understanding that the Request is directed to the services identified in the subject trademark application, documents responsive to this Request are produced in response to this Request and Document Request Nos. 5-7.

REQUEST NO. 10

If the use of Applicant's KAYLA KLEEVAGE Mark has been continuous since the date of first use, documents by which such continuous use can be established.

RESPONSE

Applicant objects to the Request as being vague, ambiguous, and overbroad. Applicant has applied to register the mark KAYLA KLEEVAGE for the services "providing live adult entertainment pictures and performances via the web" and "personal appearances by a celebrity adult entertainer." Therefore, documents relating to use for any other goods or services are irrelevant to this Opposition. Subject to this objection, and under the understanding that the Request is directed to the services identified in the subject trademark application, documents responsive to this Request are produced in response to this Request and Document Request No. 5-7 and 9.

REQUEST NO. 11

All documents relating to any search conducted by or for Applicant to determine the availability of Applicant's KAYLA KLEEVAGE Mark for registration in the United States Patent & Trademark Office, or in any foreign country.

RESPONSE

Based upon a reasonable investigation, Applicant has identified no documents responsive to this Request.

REQUEST NO. 12

All documents relating to all licenses, assignments or any other agreements involving Applicant's KAYLA KLEEVAGE Mark.

RESPONSE

Based upon a reasonable investigation, Applicant has identified no documents responsive to this Request.

REQUEST NO. 13

All documents and things the identification of which is requested in Opposer's First Set of Interrogatories, and which is or should be identified by Applicant in response to such Interrogatories.

RESPONSE

Documents responsive to this Request are produced in response to this Request and the previous Document Requests.

REQUEST NO. 14

All documents which in any way support or relate to Applicant's Answer to Opposer's Notice of Opposition.

RESPONSE

Documents responsive to this Request are produced in response to this Request and the previous Document Requests.

REQUEST NO. 15

All documents relating to Applicant's selection, adoption, and use, including its first use and first use in commerce of the KAYLA KLEEVAGE Mark.

## RESPONSE

Applicant objects to the Request as being vague, ambiguous, and overbroad. Applicant has applied to register the mark KAYLA KLEEVAGE for the services “providing live adult entertainment pictures and performances via the web” and “personal appearances by a celebrity adult entertainer.” Therefore, documents relating to use for any other goods or services are irrelevant to this Opposition. Subject to this objection, and under the understanding that the Request is directed to the services identified in the subject trademark application, documents responsive to this Request are produced in response to Document Request Nos. 5, 7, 9, and 10.

## REQUEST NO. 16

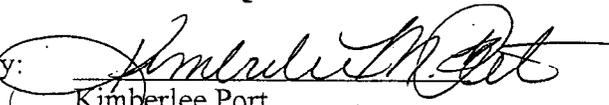
All documents regarding the geographical areas and channels of trade and distribution of goods and services offered by Applicant that bear the mark KAYLA KLEEVAGE, including representative samples of use of the mark.

## RESPONSE

Applicant objects to the Request as being vague, ambiguous, and overbroad. Applicant has applied to register the mark KAYLA KLEEVAGE for the services “providing live adult entertainment pictures and performances via the web” and “personal appearances by a celebrity adult entertainer.” Therefore, samples of use for any other goods or services are irrelevant to this Opposition. Subject to this objection, and under the understanding that the Request is directed to the services identified in the subject trademark application, documents responsive to this Request are produced in response to this Document Request No. 5, 7, 9, and 10.

Dated: Las Vegas, Nevada  
December 22, 2003

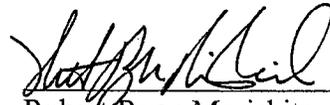
Respectfully submitted,

By:   
Kimberlee Port  
Kleevco Productions

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Applicant's Responses to Opposer's First Set of Requests for Documents and Things was served on attorneys for Opposer on January 12, 2004 by First Class Mail, postage prepaid, as follows:

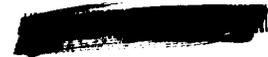
Scott W. Kelley  
KELLY BAUERSFELD LOWRY & KELLEY, LLP  
6320 Canoga Ave., Suite 1650  
Woodland Hills, CA 91367



Robert Ryan Morishita  
Attorney for Applicant

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

In the Matter of Trademark Application Serial No. 78/206,862  
For the mark KAYLA KLEEVAGE  
Published in the *Official Gazette* on October 7, 2003



07-06-2004

U.S. Patent & TMO/c/TM Mail Rcpt Dt. #22

_____	)
Kathryn Shaffer,	)
	)
Opposer,	)
	)
v.	)
	)
Kleevco Productions	)
	)
Applicant.	)
_____	)

Opposition No. 91158169

Applicant's First Set of  
Interrogatories to Opposer

**APPLICANT'S FIRST SET OF INTERROGATORIES TO OPPOSER**

Pursuant to Rule 2.120 of the Trademark Rules of Practice of the Patent and Trademark Office and Rule 33 of the Federal Rules of Civil Procedure, APPLICANT hereby requests that OPPOSER answer the following interrogatories under oath within thirty (30) days after service hereof. The following interrogatories are continuing in character and, therefore, under Rule 26(e) of the Federal Rules of Civil Procedure, require filing by OPPOSER of prompt supplemental answers if other, further or different information is secured or available prior to the final hearing of this Opposition.

**DEFINITIONS AND INSTRUCTIONS**

A. As used herein , the term "APPLICANT" means KLEEVCO PRODUCTIONS, Kimberlee Port, their predecessors-in-interest, successors, assignors, assigns, parents, subsidiaries, affiliates, licensees, franchisees and any related corporate entities or other

organizations within the meaning of Section 45(d) of the Trademark Act of 1946 (15 U.S.C. §1127), and the officers, directors, divisions, departments, licensees, franchisees, employees, agents, attorneys and representatives thereof.

B. As used herein, the term "OPPOSER" refers to KATHRYN SHAFFER, her predecessors, successors, assignors, assigns, parents, subsidiaries, affiliates and related companies within the meaning of Section 45(d) of the Trademark Act of 1946 (15 U.S.C. §1127), and the officers, directors, divisions, departments, licensees, franchisees, employees, agents, attorneys and representatives thereof.

C. As used herein, the word "Mark" shall refer to any words, logo, trademark, service mark, trade name, service mark including the words "KAYLA KLEEVAGE."

D. As used herein, the term "document" shall be given the broadest possible scope and shall include, without limitation, all writings, correspondence, books, memoranda, labels, displays, handwritten notes, drafts, invoices, contracts, purchase orders, letters, checks, receipts, pamphlets, publications, catalogs, slides, videotapes, digital video discs, films, artwork, illustrative materials, layouts, tear sheets, microfilms, computer printouts, worksheets, photographs, drawings, sketches and e-mail messages printed or in electronic form on all forms of electromagnetic and electronic data storage and computer archives, such as computer discs, floppy discs, magnetic tapes, compact discs, RAM (random access memory), ROM (read only memory) or any other kind of computer memory or storage device by which information is retained in retrievable form and any other material, whether printed, typewritten, handwritten, recorded or reproduced by any mechanical or electronic process. All relevant files that are still on any storage media, but that are identified as "erased but recoverable" are to be included. Without limiting the foregoing, "documents" include any draft or copy which differs in any

respect from the original or other versions of a document. "Thing" includes all things within the meaning of Rule 34(a) of the Federal Rule of Civil Procedure and all "writings," "recordings," and "photographs," whether original or duplicate, within the meaning of Federal Rule of Evidence, Rule 1001.

E. As used herein, the word "identify" in connection with a person or persons, shall be construed as including a request to state the full name, title and present address (or if unknown, the last known address), present telephone number, and the present employer (or if unknown, the last known employer) of each such person.

F. As used herein, the word "identify" in connection with a "document" or "documents" shall be construed as including a request to:

(i) Furnish the name, date and general description (e.g., letter, memorandum, etc.) of the document, the name and address of the person originating the document, the name and address of the persons, if any, to whom the document was addressed or delivered, the names and addresses of all persons to whom copies of the document were sent, and the firm or firms with which all such persons were connected at or during the time the document was originated; and

(ii) State whether OPPOSER is in possession of the original of the document or a copy thereof and if OPPOSER is not in possession of the original or a copy, furnish the name and address of the custodian of the original or copy; and

(iii) Furnish a general description of the subject matter to which the document pertains; and

(iv) In lieu of furnishing the foregoing information, OPPOSER may furnish APPLICANT'S counsel with a copy of the document together with any of the foregoing

information that is not readily ascertainable for the face of the document itself.

G. As used herein, the term "identify" in connection with a "company," "organization," or "account" means state: the name of the company; if incorporated, the place of incorporation and the principle place of business; and the identity of the person or persons having knowledge of the matter with respect to which the company is named.

H. The word "person" or "persons" means natural persons and any business, legal or governmental entities or associations.

I. The word "facts" means all circumstances, events and evidence pertaining to or concerning the item, thing, event, act, omission, document or other matter of the inquiry.

J. As used herein, the words "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the interrogatory all information and documentation which might otherwise be construed to be outside its scope.

K. As used herein, the single shall always include the plural and the present tense shall always include the past tense.

L. With respect to the answer to each interrogatory, or subpart thereof, state the source of the information given with as much particularity as is reasonably possible, including without limitation, the nature and designation of any files that contain such information, and identify each person who provided any information included in such answer.

M. With respect to each document which OPPOSER contends is privileged or otherwise excludable from discovery, state the basis for the privilege or other ground for exclusion so that APPLICANT and the Trademark Trial and Appeal Board may have a sufficient factual basis to determine whether or not such document or other material is privileged, including the name and address of the author(s) and the addressee(s), the date, the general

subject matter, the name and address of the person(s) who now have the original and any copies, and the identification and location of the files where the original and each copy are normally kept.

N. The documents and things produced should be segregated by Interrogatory Number so that particular documents and things can be identified as having been produced in response to each particular Interrogatory Number.

O. If, in answering these interrogatories OPPOSER encounters any ambiguity in construing an interrogatory, set forth the matter deemed ambiguous and the construction chosen or used in responding.

### INTERROGATORIES

#### INTERROGATORY NO. 1

With reference to paragraph 2 of the Notice of Opposition,

- (a) state all facts supporting OPPOSER'S contentions;
- (b) state the date OPPOSER first used the name KAT KLEEVAGE in association with providing "live adult entertainment in the form of pictures and performances via the Internet;" and
- (c) state all witnesses having knowledge concerning OPPOSER'S responses to subparts (a)-(b) above.

#### INTERROGATORY NO. 2

For each of the years 2000 to the present,

- (a) state the nature of each and every good or service provided by OPPOSER under the mark KAT KLEEVAGE;
- (b) state the date OPPOSER first used the mark KAT KLEEVAGE in

connection with each good or service;

(c) if OPPOSER has discontinued use of the mark KAT KLEEVAGE for any good or service, state the date use was discontinued;

(d) if OPPOSER has discontinued use of the mark KAT KLEEVAGE for any good or service, state the reasons use was discontinued;

(e) state the nature of use of the mark KAT KLEEVAGE in connection with each good or service including the manner the mark KAT KLEEVAGE or other source identifying symbols are displayed by OPPOSER in connection with each of the goods/services;

(f) state the channels of trade (i.e., types of retail stores, catalogs, mail order, private sales, promotional sales, online sales, etc.) through which each good or service is provided to the ultimate consumer;

(g) identify the geographic locations where OPPOSER'S goods/services are provided under the mark KAT KLEEVAGE;

(h) state the annual volume of sales for each good/service provided by OPPOSER under the mark KAT KLEEVAGE (broken down for each location identified in the preceding subpart, if possible);

(i) state OPPOSER'S annual sales revenues separately identifying annual sales revenues for "live adult entertainment pictures and performances via the Internet," "personal appearances as a celebrity adult entertainer," and other goods/services provided by OPPOSER in connection with the mark KAT KLEEVAGE;

(j) state the demographics of consumers of OPPOSER'S goods/services under the mark KAT KLEEVAGE; and

(k) identify all witnesses having knowledge concerning OPPOSER'S

responses to subparts (a)–(j) above.

INTERROGATORY NO. 3

With reference to paragraph 3 of the Notice of Opposition,

- (a) state all facts supporting OPPOSER'S contentions;
- (b) state the basis for filing a U.S. trademark application for the mark KAT KLEEVAGE;
- (c) identify any and all marks other than "KAT KLEEVAGE" used by OPPOSER in connection with "live adult entertainment pictures and performances via the Internet" and/or "personal appearances as a celebrity adult entertainer" from the time OPPOSER began providing such services to the present;
- (d) for each mark identified in response to subpart (c), state the goods or services provided under the mark;
- (e) for each mark identified in response to subpart (c), state the dates of use of the mark;
- (f) for each mark identified in response to subpart (c), state the facts and circumstances surrounding the adoption of the mark; and
- (g) identify all witnesses having knowledge concerning OPPOSER'S responses to subparts (a)–(f) above.

INTERROGATORY NO. 4

If OPPOSER contends that OPPOSER has trademark rights in the mark KAT KLEEVAGE,

- (a) state the basis for OPPOSER'S contention;
- (b) state all facts supporting OPPOSER'S contention;

(c) identify all witnesses having knowledge concerning OPPOSER'S responses to subparts (a) and (b) above.

INTERROGATORY NO. 5

(a) State the date when OPPOSER first selected the mark KAT KLEEVAGE for use in connection with any goods or services;

(b) state the facts and circumstances concerning selection of the mark KAT KLEEVAGE; and

(c) identify all persons or entities who participated in or were consulted in such selection, including a description of the nature of their participation or consultation.

INTERROGATORY NO. 6

(a) State the date OPPOSER first became aware of APPLICANT'S use of the mark KAYLA KLEEVAGE;

(b) identify any trademark searches or investigations conducted on behalf of OPPOSER regarding the marks KAT KLEEVAGE or KAYLA KLEEVAGE; and

(c) for each trademark search or investigation, state:

(1) the date it was made;

(2) the name, address, and qualifications of the person by whom it was made;

(3) the name and address of the person who requested it; and

(4) whether any report of findings were made or recorded and, if so, identify such report or finding.

INTERROGATORY NO. 7

(a) Identify any market research studies (including focus groups) undertaken by or on behalf of OPPOSER in connection with products or services using or intended to use the Mark;

and

- (b) For each such market research study conducted, state:
- (1) the date it was made;
  - (2) the name, address, and qualifications of the person by whom it was made;
  - (3) the name and address of the person who requested it; and
  - (4) whether any report of findings were made or recorded and, if so, identify such report or finding.

INTERROGATORY NO. 8

Identify each foreign, federal, state, or local trademark, service mark or tradename registration or application which OPPOSER has obtained or filed anywhere OPPOSER uses the mark KAT KLEEVAGE, either alone or in combination with other terms or designs, and state the status of each registration or application identified.

INTERROGATORY NO. 9

For all efforts by OPPOSER to promote an association with consumers between the mark KAT KLEEVAGE and OPPOSER, for each of the years 2000 to the present:

- (a) identify each separate item of advertising and/or promotional material ever used, now used, or proposed to be used by OPPOSER in promoting products or services under the mark KAT KLEEVAGE;
- (b) state the nature of OPPOSER'S promotional activities for each state where such promotion has occurred;
- (c) state the type of media used by OPPOSER to promote an association including, but not limited to, magazine advertising, flyers, radio, television, Internet, and newspapers;

(d) state the annual expenditures for each type of media used to promote an association;

(e) state the geographic areas served by each media type referred to in response to subpart (b) above;

(f) state the target audience for OPPOSER'S promotional activities;

(g) if OPPOSER contends that the mark KAT KLEEVAGE is inherently distinctive, state all facts to support OPPOSER'S contention;

(h) if OPPOSER contends that the mark KAT KLEEVAGE has acquired secondary meaning, state all facts to support OPPOSER'S contention; and

(g) identify all witnesses having knowledge concerning OPPOSER'S responses to subparts (a)–(h) above.

#### INTERROGATORY NO. 10

State all facts supporting OPPOSER'S contentions contained in paragraph 4 of the Notice of Opposition and identify all witnesses having knowledge of those facts.

#### INTERROGATORY NO. 11

State all facts supporting OPPOSER'S contentions contained in paragraph 5 of the Notice of Opposition and identify all witnesses having knowledge of those facts.

#### INTERROGATORY NO. 12

State all facts supporting OPPOSER'S contentions contained in paragraph 6 of the Notice of Opposition and identify all witnesses having knowledge of those facts.

#### INTERROGATORY NO. 13

If OPPOSER contends that KAYLA KLEEVAGE is descriptive of “providing live adult entertainment pictures and performances via the web” or “personal appearances by a celebrity

adult entertainer,”

- (a) state the basis for OPPOSER’S contention;
- (b) state all facts supporting OPPOSER’S contention;
- (c) state whether the mark KAT KLEEVAGE is descriptive of “providing live

adult entertainment pictures and performances via the web” or “personal appearances by a celebrity adult entertainer;”

- (d) state the basis for OPPOSER’S response to subpart (c);
- (e) state all facts supporting OPPOSER’S response to subpart (c); and
- (f) identify all witnesses having knowledge concerning OPPOSER’S

responses to subparts (a)–(e).

INTERROGATORY NO. 14

With reference to paragraph 7 of the Notice of Opposition,

- (a) state the basis for contending that OPPOSER will be harmed;
- (b) state all facts supporting OPPOSER’S contentions; and
- (c) identify all witnesses having knowledge concerning OPPOSER’S

responses to subparts (a) and (b).

INTERROGATORY NO. 15

If OPPOSER contends that there is a likelihood of confusion between KAT KLEEVAGE and KAYLA KLEEVAGE,

- (a) state the basis for OPPOSER’S contention;
- (b) state all facts supporting OPPOSER’S contention;
- (c) identify all instances of actual confusion of which OPPOSER is aware;
- (d) identify all channels of trade common to OPPOSER and APPLICANT in

which the marks have been used; and

(e) identify all witnesses having knowledge concerning OPPOSER'S responses to subparts (a)–(d).

INTERROGATORY NO. 16

Identify all agreements, oral or written, between OPPOSER and any other person or entity relating to the use of KAT KLEEVAGE, including, without limitation, all agreements, assignments, and licenses.

INTERROGATORY NO. 17

Apart from this Opposition, identify all litigations, oppositions, cancellation proceedings, inter partes proceedings and/or other disputes in which OPPOSER has been involved, relating to the use of trademarks or service marks.

INTERROGATORY NO. 18

Identify each person OPPOSER expects to call as a witness, including expert witnesses, and with respect to each such witness, state:

- (a) the subject matter on which the witness is expected to testify; and
- (b) the substance of the facts and opinions to which each witness is expected to testify and a summary of the grounds for each opinion.

INTERROGATORY NO. 19

Identify each and every person who supplied information for and/or participated in responding to these Interrogatories and Applicant's First Set of Requests for Production of Documents and Things to Opposer.

INTERROGATORY NO. 20

If OPPOSER'S response to any of the Requests for Admissions served herewith is

anything other than an unqualified admission, identify the number of the request and

- (a) state all facts concerning OPPOSER'S response; and
- (b) identify all witnesses having knowledge concerning those facts.

Dated: Las Vegas, Nevada  
December 22, 2003

Respectfully submitted,

ANDERSON & MORISHITA, L.L.C.

By:



Robert Ryan Morishita  
Anderson & Morishita, L.L.C.  
2725 S. Jones Blvd., Suite 102  
Las Vegas, NV 89146

Certificate of Service

I hereby certify that a true and correct copy of the foregoing APPLICANT'S FIRST SET OF INTERROGATORIES TO OPPOSER was served on attorneys for Opposer on December 22, 2003 by First Class Mail, postage prepaid, as follows:

Scott W. Kelley  
KELLY BAUERSFELD LOWRY & KELLEY, LLP  
6320 Canoga Ave., Suite 1650  
Woodland Hills, CA 91367

  
Robert Ryan Morishita  
Attorney for Applicant

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

In the Matter of Trademark Application Serial No. 78/206,862  
For the mark KAYLA KLEEVAGE  
Published in the *Official Gazette* on October 7, 2003

	)	
Kathryn Shaffer,	)	
	)	Opposition No. 91158169
Opposer,	)	
	)	
v.	)	<u>Applicant's First Set of Requests</u>
	)	<u>for Admissions to Opposer</u>
Kleevco Productions	)	
	)	
Applicant.	)	
	)	

**APPLICANT'S FIRST SET OF REQUESTS FOR ADMISSIONS TO OPPOSER**

Pursuant to 37 CFR 1.120 and Rule 36 of the Federal Rules of Civil Procedure,  
APPLICANT propounds the following requests for admissions to be answered by OPPOSER  
under oath within thirty (30) days after service hereof.

**DEFINITIONS AND INSTRUCTIONS**

A. As used herein , the term "APPLICANT" means KLEEVCO PRODUCTIONS,  
Kimberlee Port, their predecessors-in-interest, successors, assignors, assigns, parents,  
subsidiaries, affiliates, licensees, franchisees and any related corporate entities or other  
organizations within the meaning of Section 45(d) of the Trademark Act of 1946 (15 U.S.C.  
§1127), and the officers, directors, divisions, departments, licensees, franchisees, employees,  
agents, attorneys and representatives thereof.

B. As used herein, the term "OPPOSER" refers to KATHRYN SHAFFER, her

predecessors, successors, assignors, assigns, parents, subsidiaries, affiliates and related companies within the meaning of Section 45(d) of the Trademark Act of 1946 (15 U.S.C. §1127), and the officers, directors, divisions, departments, licensees, franchisees, employees, agents, attorneys and representatives thereof.

C. As used herein, the word "Mark" shall refer to any words, logo, trademark, service mark, trade name, service mark including the words "KAYLA KLEEVAGE."

D. As used herein, the term "document" shall be given the broadest possible scope and shall include, without limitation, all writings, correspondence, books, memoranda, labels, displays, handwritten notes, drafts, invoices, contracts, purchase orders, letters, checks, receipts, pamphlets, publications, catalogs, slides, videotapes, digital video discs, films, artwork, illustrative materials, layouts, tear sheets, microfilms, computer printouts, worksheets, photographs, drawings, sketches and e-mail messages printed or in electronic form on all forms of electromagnetic and electronic data storage and computer archives, such as computer discs, floppy discs, magnetic tapes, compact discs, RAM (random access memory), ROM (read only memory) or any other kind of computer memory or storage device by which information is retained in retrievable form and any other material, whether printed, typewritten, handwritten, recorded or reproduced by any mechanical or electronic process. All relevant files that are still on any storage media, but that are identified as "erased but recoverable" are to be included. Without limiting the foregoing, "document" includeS any draft or copy which differs in any respect from the original or other versions of a document. "Thing" includes all things within the meaning of Rule 34(a) of the Federal Rule of Civil Procedure and all "writings," "recordings," and "photographs," whether original or duplicate, within the meaning of Federal Rule of Evidence, Rule 1001.

E. As used herein, the word "identify" in connection with a person or persons, shall be construed as including a request to state the full name, title and present address (or if unknown, the last known address), present telephone number, and the present employer (or if unknown, the last known employer) of each such person.

F. As used herein, the word "identify" in connection with a "document" or "documents" shall be construed as including a request to:

(i) Furnish the name, date and general description (e.g., letter, memorandum, etc.) of the document, the name and address of the person originating the document, the name and address of the persons, if any, to whom the document was addressed or delivered, the names and addresses of all persons to whom copies of the document were sent, and the firm or firms with which all such persons were connected at or during the time the document was originated; and

(ii) State whether OPPOSER is in possession of the original of the document or a copy thereof and if OPPOSER is not in possession of the original or a copy, furnish the name and address of the custodian of the original or copy; and

(iii) Furnish a general description of the subject matter to which the document pertains; and

(iv) In lieu of furnishing the foregoing information, OPPOSER may furnish APPLICANT's counsel with a copy of the document together with any of the foregoing information that is not readily ascertainable for the face of the document itself.

G. As used herein, the term "identify" in connection with a "company," "organization," or "account" means state: the name of the company; if incorporated, the place of incorporation and the principle place of business; and the identity of the person or persons having

knowledge of the matter with respect to which the company is named.

H. The word "person" or "persons" means natural persons and any business, legal or governmental entities or associations.

I. The word "facts" means all circumstances, events and evidence pertaining to or concerning the item, thing, event, act, omission, document or other matter of the inquiry.

J. As used herein, the words "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the request all information and documentation which might otherwise be construed to be outside its scope.

K. As used herein, the single shall always include the plural and the present tense shall always include the past tense.

L. With respect to the answer to each request, or subpart thereof, state the source of the information given with as much particularity as is reasonably possible, including without limitation, the nature and designation of any files that contain such information, and identify each person who provided any information included in such answer.

M. With respect to each document which OPPOSER contends is privileged or otherwise excludable from discovery, state the basis for the privilege or other ground for exclusion so that APPLICANT and the Trademark Trial and Appeal Board may have a sufficient factual basis to determine whether or not such document or other material is privileged, including the name and address of the author(s) and the addressee(s), the date, the general subject matter, the name and address of the person(s) who now have the original and any copies, and the identification and location of the files where the original and each copy are normally kept.

N. The documents and things produced should be segregated by Request Number so that particular documents and things can be identified as having been produced in response to

each particular Request Number.

O. If, in answering these interrogatories OPPOSER encounters any ambiguity in construing a request, set forth the matter deemed ambiguous and the construction chosen or used is responding.

#### REQUESTS FOR ADMISSIONS

##### REQUEST NO. 1

Admit that you have not used "KAYLA KLEEVAGE" for any goods or services provided by you.

##### REQUEST NO. 2

Admit that you have not registered or applied to register "KAYLA KLEEVAGE" as a trademark, trade name, service mark, or service name.

##### REQUEST NO. 3

Admit that you were aware of APPLICANT'S use of the mark KAYLA KLEEVAGE prior to adopting the mark KAT KLEEVAGE.

##### REQUEST NO. 4

Admit that you were aware of APPLICANT'S use of the mark KAYLA KLEEVAGE prior to filing U.S. Trademark Application Serial No. 76/543,254 for KAT KLEEVAGE.

##### REQUEST NO. 5

Admit that you were not entitled to apply for registration of the mark KAT KLEEVAGE on September 8, 2003 because you believe "kleevage" is descriptive.

##### REQUEST NO. 6

Admit that your mark KAT KLEEVAGE is descriptive of your goods/services.

##### REQUEST NO. 7

Admit that there is a likelihood of confusion between OPPOSER'S mark KAT  
KLEEVAGE and APPLICANT'S mark KAYLA KLEEVAGE.

Dated: Las Vegas, Nevada  
December 22, 2003

Respectfully submitted,

ANDERSON & MORISHITA, L.L.C.

By:



Robert Ryan Morishita  
Anderson & Morishita, L.L.C.  
2725 S. Jones Blvd., Suite 102  
Las Vegas, NV 89146

**Certificate of Service**

I hereby certify that a true and correct copy of the foregoing APPLICANT'S FIRST SET OF REQUESTS FOR ADMISSIONS TO OPPOSER was served on attorneys for Opposer on December 22, 2003 by First Class Mail, postage prepaid, as follows:

Scott W. Kelley  
KELLY BAUERSFELD LOWRY & KELLEY, LLP  
6320 Canoga Ave., Suite 1650  
Woodland Hills, CA 91367

  
Robert Ryan Morishita  
Attorney for Applicant

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

In the Matter of Trademark Application Serial No. 78/206,862  
For the mark KAYLA KLEEVAGE  
Published in the *Official Gazette* on October 7, 2003

Kathryn Shaffer,	)	
	)	
Opposer,	)	Opposition No. 91158169
	)	
v.	)	<u>Applicant's First Set of Requests</u>
	)	<u>for Production of Documents and</u>
Kleevco Productions	)	<u>Things to Opposer</u>
	)	
Applicant.	)	
	)	

**APPLICANT'S FIRST SET OF REQUESTS FOR PRODUCTION OF  
DOCUMENTS AND THINGS TO OPPOSER**

Pursuant to Rule 2.120 of the Trademark Rules of Practice of the Patent and Trademark Office and Rule 34 of the Federal Rules of Civil Procedure, Opposer hereby requests that OPPOSER produce for inspection and copying at the offices of Anderson & Morishita, LLC, 2725 S. Jones Blvd., Suite 102, Las Vegas, NV 89146, each of the requested documents and things within thirty (30) days after service hereof. The following requests for documents and things are continuing in character and, therefore, under Rule 26(e) of the Federal Rules of Civil Procedure, require filing by OPPOSER of prompt supplemental or subsequent production of documents if other, further or different information is secured or available prior to the final hearing of this Opposition.

## DEFINITIONS AND INSTRUCTIONS

A. As used herein, the term "APPLICANT" means KLEEVCO PRODUCTIONS, Kimberlee Port, their predecessors-in-interest, successors, assignors, assigns, parents, subsidiaries, affiliates, licensees, franchisees and any related corporate entities or other organizations within the meaning of Section 45(d) of the Trademark Act of 1946 (15 U.S.C. §1127), and the officers, directors, divisions, departments, licensees, franchisees, employees, agents, attorneys and representatives thereof.

B. As used herein, the term "OPPOSER" refers to KATHRYN SHAFFER, her predecessors, successors, assignors, assigns, parents, subsidiaries, affiliates and related companies within the meaning of Section 45(d) of the Trademark Act of 1946 (15 U.S.C. §1127), and the officers, directors, divisions, departments, licensees, franchisees, employees, agents, attorneys and representatives thereof.

C. As used herein, the word "Mark" shall refer to any words, logo, trademark, service mark, trade name, service mark including the words "KAYLA KLEEVAGE."

D. As used herein, the term "documents" shall be given the broadest possible scope and shall include, without limitation, all writings, correspondence, books, memoranda, labels, displays, handwritten notes, drafts, invoices, contracts, purchase orders, letters, checks, receipts, pamphlets, publications, catalogs, slides, videotapes, digital video discs, films, artwork, illustrative materials, layouts, tear sheets, microfilms, computer printouts, worksheets, photographs, drawings, sketches and e-mail messages printed or in electronic form on all forms of electromagnetic and electronic data storage and computer archives, such as computer discs, floppy discs, magnetic tapes, compact discs, RAM (random access memory), ROM (read only memory) or any other kind of computer memory or storage device by which information is

retained in retrievable form and any other material, whether printed, typewritten, handwritten, recorded or reproduced by any mechanical or electronic process. All relevant files that are still on any storage media, but that are identified as "erased but recoverable" are to be included. Without limiting the foregoing, "documents" include any draft or copy which differs in any respect from the original or other versions of a document. "Thing" includes all things within the meaning of Rule 34(a) of the Federal Rule of Civil Procedure and all "writings," "recordings," and "photographs," whether original or duplicate, within the meaning of Federal Rule of Evidence, Rule 1001.

E. As used herein, the word "identify" in connection with a person or persons, shall be construed as including a request to state the full name, title and present address (or if unknown, the last known address), present telephone number, and the present employer (or if unknown, the last known employer) of each such person.

F. As used herein, the word "identify" in connection with a "document" or "documents" shall be construed as including a request to:

(i) Furnish the name, date and general description (e.g., letter, memorandum, etc.) of the document, the name and address of the person originating the document, the name and address of the persons, if any, to whom the document was addressed or delivered, the names and addresses of all persons to whom copies of the document were sent, and the firm or firms with which all such persons were connected at or during the time the document was originated; and

(ii) State whether OPPOSER is in possession of the original of the document or a copy thereof and if OPPOSER is not in possession of the original or a copy, furnish the name and address of the custodian of the original or copy; and

(iii) Furnish a general description of the subject matter to which the document pertains; and

(iv) In lieu of furnishing the foregoing information, OPPOSER may furnish APPLICANT'S counsel with a copy of the document together with any of the foregoing information that is not readily ascertainable for the face of the document itself.

G. As used herein, the term "identify" in connection with a company, organization or "account" means state: the name of the company; if incorporated, the place of incorporation and the principle place of business; and the identity of the person or persons having knowledge of the matter with respect to which the company is named.

H. The word "person" or "persons" means natural persons and any business, legal or governmental entities or associations.

I. The word "facts" means all circumstances, events and evidence pertaining to or concerning the item, thing, event, act, omission, document or other matter of the inquiry.

J. As used herein, the words "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the request all information and documentation which might otherwise be construed to be outside its scope.

K. As used herein, the single shall always include the plural and the present tense shall always include the past tense.

L. With respect to each document which OPPOSER contends is privileged or otherwise excludable from discovery, state the basis for the privilege or other ground for exclusion so that APPLICANT and the Trademark Trial and Appeal Board may have a sufficient factual basis to determine whether or not such document or other material is privileged, including the name and address of the author(s) and the addressee(s), the date, the general

subject matter, the name and address of the person(s) who now have the original and any copies, and the identification and location of the files where the original and each copy are normally kept.

M. The documents and things produced should be segregated by Request Number so that particular documents and things can be identified as having been produced in response to each particular Request.

N. If, in answering these interrogatories or responding to these document requests OPPOSER encounters any ambiguity in construing a document request, set forth the matter deemed ambiguous and the construction chosen or used in responding.

## DOCUMENT REQUESTS

### REQUEST NO. 1

If you contend that use by APPLICANT of KAYLA KLEEVAGE for “providing live adult entertainment pictures and performances via the web” or “personal appearances by a celebrity adult entertainer,” is likely to cause confusion with OPPOSER’s mark KAT KLEEVAGE, identify and produce all documents and things which support your contention.

### REQUEST NO. 2

Identify and produce all documents and things evidencing your use of KAT KLEEVAGE in connection with “live adult entertainment pictures and performances via the Internet,” “personal appearances as a celebrity adult entertainer,” and any other goods/services provided by you under the mark KAT KLEEVAGE for each of the years 2000 to the present including a specimen of each use bearing the mark KAT KLEEVAGE that is used, was used, or is proposed to be used by OPPOSER and/or any licensees of OPPOSER.

REQUEST NO. 3

To the extent not already produced in response to Request No. 2, identify and produce all documents and things constituting or referring or relating to marketing, advertising, or promotion of goods and services offered by OPPOSER under the mark KAT KLEEVAGE.

REQUEST NO. 4

Identify and produce all documents and things concerning any instances of actual confusion between OPPOSER and APPLICANT concerning use of the marks.

REQUEST NO. 5

Identify and produce all documents and things establishing that KAT KLEEVAGE is inherently distinctive or has acquired secondary meaning.

REQUEST NO. 6

Identify and produce all documents and things concerning any licenses or assignments by OPPOSER regarding use of KAT KLEEVAGE.

REQUEST NO. 7

Identify and produce all documents relating to any trademark search or investigation conducted by, or on behalf of, OPPOSER concerning the marks KAT KLEEVAGE or KAYLA KLEEVAGE.

REQUEST NO. 8

Identify and produce all documents constituting or relating or referring to any market research, focus group study or survey including, without limitation, transcripts or tapes of focus groups, made or commissioned by or on behalf of OPPOSER about goods or services used, or intended to be used, with the mark KAT KLEEVAGE.

REQUEST NO. 9

Identify and produce all documents concerning OPPOSER's selection and/or adoption of the mark KAT KLEEVAGE.

REQUEST NO. 10

Identify and produce documents sufficient to establish OPPOSER's business structure.

REQUEST NO. 11

Identify and produce all documents and things establishing OPPOSER's gross revenues from "live adult entertainment pictures and performances via the Internet," "personal appearances as a celebrity adult entertainer," and other goods/services provided by OPPOSER in connection with the mark KAT KLEEVAGE

REQUEST NO. 12

Identify and produce all documents and things establishing OPPOSER's annual expenditures for advertising or otherwise promoting the mark KAT KLEEVAGE.

REQUEST NO. 13

Identify and produce all documents constituting or referring or relating to plans to expand the geographical area in which OPPOSER uses KAT KLEEVAGE.

REQUEST NO. 14

Identify and produce all documents constituting or referring or relating to plans to expand the goods or services with which OPPOSER uses KAT KLEEVAGE.

REQUEST NO. 15

If you contend that the mark "KAYLA KLEEVAGE" is descriptive of "providing live adult entertainment pictures and performances via the web" or "personal appearances by a celebrity adult entertainer," identify and produce all documents and things which support your

contention.

REQUEST NO. 16

Identify and produce all documents constituting or referring or relating to OPPOSER's first knowledge of APPLICANT's use of "KAYLA KLEEVAGE."

REQUEST NO. 17

Identify and produce all documents referring or relating to APPLICANT's use of, or application to register, "KAYLA KLEEVAGE."

REQUEST NO. 18

Identify and produce all documents constituting or relating or referring to national, federal, state, and local trademark, trade name, service mark, and service name applications and registrations owned, filed, or used by OPPOSER for KAT KLEEVAGE.

REQUEST NO. 19

Identify and produce all documents OPPOSER intends to use or introduce in any evidentiary hearing, testimony period, or trial in this Opposition.

REQUEST NO. 20

To the extent not produced in response to Request Nos. 1 through 19 above, all documents identified, requested to be identified, referred to, or relied upon in answering Interrogatories Nos. 1 through 20.

Dated: Las Vegas, Nevada  
December 22, 2003

Respectfully submitted,

ANDERSON & MORISHITA, L.L.C.

By:



Robert Ryan Morishita  
Anderson & Morishita, L.L.C.  
2725 S. Jones Blvd., Suite 102  
Las Vegas, NV 89146

Certificate of Service

I hereby certify that a true and correct copy of the foregoing APPLICANT'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS TO OPPOSER was served on attorneys for Opposer on December 22, 2003 by First Class Mail, postage prepaid, as follows:

Scott W. Kelley  
KELLY BAUERSFELD LOWRY & KELLEY, LLP  
6320 Canoga Ave., Suite 1650  
Woodland Hills, CA 91367

  
\_\_\_\_\_  
Robert Ryan Morishita  
Attorney for Applicant

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

KATHRYN SHAFFER,  
Opposer,

v.

KLEEVCO PRODUCTIONS,  
Applicant.

---

) In Re Application of  
) KLEEVCO PRODUCTIONS  
) U.S. Trademark Ser. No. 78/206,862  
) Published: October 7, 2003  
) Mark: KAYLA KLEEVAGE  
)  
)  
) Opposition No. 91158169  
)

**OPPOSER'S RESPONSES TO APPLICANT'S  
FIRST SET OF INTERROGATORIES**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Opposer Kathryn Shaffer ("Opposer") hereby responds to Applicant Kleeenco Productions ("Applicant") First Set of Interrogatories as follows.

**GENERAL OBJECTIONS**

Opposer states the following general objections to Applicant's First Set of Interrogatories which are incorporated by reference into each and every one of Opposer's responses to the full extent applicable, even though not repeated in individual responses.

1. Opposer is responding to Applicant's discovery request in accordance with the Federal Rules of Civil Procedure and objects to Applicant's requests for information that require Opposer to perform tasks not required by the Federal Rules of Civil Procedure or go beyond the scope of proper discovery.

2. Opposer objects to producing documents or providing information sought by Applicant which is protected from discovery under the attorney-client privilege, the work product doctrine and/or any other applicable privilege, doctrine or immunity. This shall be a standing and continuing objection and may not be repeated in response to Applicant's individual requests.

3. Opposer objects to producing documents called for by Applicant's requests: (a) contained in documents attached to other papers filed/served in this Opposition or (b) known to be in the possession of Applicant or its counsel.

4. Opposer objects to the discovery requests to the extent they are vague, ambiguous or burdensome.

5. Opposer objects to the interrogatories and document requests to the extent they require disclosure of confidential proprietary information.

### **General Statement**

All of the following responses are based on such information as is currently known based on reasonable inquiry. Opposer reserves the right to alter, amend or supplement these responses as necessary. Subject to the foregoing, Opposer responds as follows:

Interrogatory No. 1:

With reference to paragraph 2 of the Notice of Opposition,

(a) state all facts supporting OPPOSER's contentions;

(b) stated the date OPPOSER first used the name KAT KLEEVAGE in association with providing "live adult entertainment in the form of pictures and performances via the Internet;" and

(c) state all witnesses having knowledge concerning OPPOSER's responses to subpart (a)-(b) above.

Response No. 1:

Opposer first used the name KAT KLEEVAGE in association with providing "live adult entertainment in the form of pictures and performances via the Internet" on March 20, 2003, Kathryn Shaffer being a witness to this. All facts supporting Opposer's contention with respect to paragraph 2 of the Notice of Opposition are found in the documents Opposer is producing to Applicant.

Interrogatory No. 2:

For each of the years 2000 to the present,

(a) state the nature of each and every good or service provided by OPPOSER under the mark KAT KLEEVAGE;

(b) state the date OPPOSER first used the mark KAT KLEEVAGE in

connection with each good or service;

(c) if OPPOSER has discontinued use of the mark KAT KLEEVAGE for any good or service, state the date use was discontinued;

(d) if OPPOSER has discontinued use of the mark KAT KLEEVAGE for any good or service, state the reasons use was discontinued;

(e) state the nature of use of the mark KAT KLEEVAGE in connection with each good or service including the manner the mark KAT KLEEVAGE or other source identifying symbols are displayed by OPPOSER in connection with each of the goods/services;

(f) state the channels of trade (i.e., types of retail stores, catalogs, mail order, private sales, promotional sales, online sales, etc.) through which each good or service is provided to the ultimate consumer.

(g) identify the geographic locations where OPPOSER's goods/service are provided under the mark KAT KLEEVAGE;

(h) state the annual volume of sales for each good/service provided by OPPOSER under the mark KAT KLEEVAGE (broken down for each location identified in the preceding subpart, if possible);

(I) state OPPOSER's annual sales revenues separately identifying annual sales revenues for "live adult entertainment pictures and performances via the Internet," "personal appearances as a celebrity adult entertainer," and other goods/services provided by OPPOSER in connection with the mark KAT KLEEVAGE;

(j) state the demographics of consumers of OPPOSER's goods/services under

the mark KAT KLEEVAGE; and

(k) identify all witnesses having knowledge concerning OPPOSER's responses to subpart (a)-(j) above.

Response No. 2:

(a) Magazines, videos, Internet web-site, trade show and convention personal appearances on behalf of video production companies.

(b) May of 2000 (magazines), December 7, 2001 (videos), March 20, 2003 (Internet), January of 2002 (personal appearances).

(c) The mark KAT KLEEVAGE has not been discontinued.

(d) The mark KAT KLEEVAGE has not been discontinued.

(e) The mark KAT KLEEVAGE is always used together as a composite mark to identify Opposer Kathryn Shaffer, a large breasted adult film star and model.

(f) Internet, mainstream porn production, adult sex shops.

(g) Worldwide.

(h) Opposer does not have any information with respect to the annual volume of sales of the videos and magazines which feature or include appearances by Opposer.

(i) Opposer's web-site is not a commercial money generating web-site, but rather a promotional web-site. Opposer earns approximately \$250-\$500 per day for personal appearances as a celebrity adult entertainer.

(j) Adult men and women interested in large breasted adult entertainment.

(k) Kathryn Shaffer.

Interrogatory No. 3:

With reference to paragraph 3 of the Notice of Opposition,

- (a) state all facts supporting OPPOSER's contentions;
- (b) state the basis for filing a U.S. trademark application for the mark KAT KLEEVAGE;
- (c) identify any and all marks other than "KAT KLEEVAGE" used by OPPOSER in connection with "live entertainment pictures and performances via the Internet" and/or "personal appearances as a celebrity adult entertainer" from the time OPPOSER began providing such services the present;
- (d) for each mark identified in response to subpart (c), state the goods or services provided under the mark;
- (e) for each mark identified in response to subpart (c), state the dates of use of the mark;
- (f) for each mark identified in response to subpart (c), state the facts and circumstances surrounding the adoption of the mark; and
- (g) identify all witnesses having knowledge concerning OPPOSER's responses to subparts (a)-(f) above.

Response No. 3:

(a) Opposer appeared in Gent Magazine in approximately May of 2000. Other facts supporting Opposer's contention to paragraph 3 of the Notice of Opposition are found in the documents produced by Opposer to Applicant.

(b) Although Opposer believes that the term "KLEEVAGE" is descriptive of large breasted models and adult entertainment focusing on breasts, Opposer believes that the composite mark KAT KLEEVAGE, taken as a whole and always together, might have protectable aspects and thus Opposer has filed a U.S. trademark application to prevent others from exactly copying this mark.

- (c) None.
- (d) None.
- (e) None.
- (f) Not applicable.
- (g) Kathryn Shaffer.

Interrogatory No. 4:

If OPPOSER contends that OPPOSER has trademark rights in the mark KAT KLEEVAGE;

- (a) state the basis for OPPOSER's contention;
- (b) state all facts supporting OPPOSER's contention;
- (c) identify all witnesses having knowledge concerning OPPOSER's responses to subparts (a) and (b) above.

Response No. 4:

See Responses to Interrogatory No. 3.

Interrogatory No. 5:

(a) States the date when OPPOSER first selected the mark KAT KLEEVAGE for use in connection with any goods or services;

(b) state the facts and circumstances concerning selection of the mark KAT KLEEVAGE; and

(c) identify all persons or entities who participated in or were consulted in such selection, including a description of the nature of their participation or consultation.

Response No. 5:

(a) Early 2000.

(b) Opposer Kathryn Shaffer is often referred to by her nickname "KAT". A friend and business associate Pamela Peaks first applied to the mark KAT KLEEVAGE in association with Opposer to identify Opposer in the adult entertainment industry, and particularly for large breasted adult entertainment models.

Interrogatory No. 6:

(a) State the date OPPOSER first became aware of APPLICANT'S use of the mark KAT KLEEVAGE;

(b) identify any trademark searches or investigations conducted on behalf of OPPOSER regarding the marks KAT KLEEVAGE or KAYLA KLEEVAGE; and

(c) for each trademark search or investigation, state:

(1) the date it was made;

- (2) the name, address, and qualifications of the person by whom it was made;
- (3) the name and address of the person who requested it; and
- (4) whether any report of findings were made or recorded and, if so, identify

such report or finding.

Response No. 6:

- (a) Approximately March of 2003.
- (b) Opposer refers Applicants to the documents produced in Response to Applicant's Request for Documents and Things.
- (c) Opposer objects to this Interrogatory so far as it seeks confidential attorney-client communication or work product information. Subject to these objections, the Internet searches and production of documents, which in part comprise a trademark search, were conducted in December of 2003 and January of 2004 by Kathryn Shaffer.

Interrogatory No. 7:

- (a) Identify any market research studies (including focus groups) undertaken by or on behalf of OPPOSER in connection with products or services using or intended to use the Mark; and
- (b) For each such market research study conducted, state:
  - (1) the date it was made;
  - (2) the name, address, and qualifications of the person by whom it was made;
  - (3) the name and address of the person who requested it; and

(4) whether any report of findings were made or recorded and, if so, identify such report or finding.

Response No. 7:

- (a) None.
- (b) Not applicable.

Interrogatory No. 8:

Identify each foreign, federal, state, or local trademark, service mark or tradename registration or application which OPPOSER has obtained or filed anywhere OPPOSER uses the mark KAT KLEEVAGE, either alone or in combination with other terms or designs, and state the status of each registration or application identified.

Response No. 8:

Opposer objects to this Interrogatory to the extent that it seeks attorney-client privileged communications or work product. Subject to these objections, any such records are publicly available, such as through the United States Patent and Trademark Office, to Applicant.

Interrogatory No. 9:

For all efforts by OPPOSER to promote an association with consumers between the mark KAT KLEEVAGE and OPPOSER, for each of the years 2000 to the present:

- (a) identify each separate item of advertising and/or promotional material ever used,

now used, or proposed to be used by OPPOSER in promoting products or services under the mark KAT KLEEVAGE;

(b) state the nature of OPPOSER's promotional activities for each state where such promotion has occurred;

(c) state the type of media used by OPPOSER to promote an association including, but not limited to, magazine advertising, flyers, radio, television, Internet, and newspapers;

(d) state the annual expenditures for each type of media used to promote an association;

(e) state the geographic areas served by each media type referred to in response to subpart (b) above;

(f) state the target audience for OPPOSER's promotional activities;

(g) if OPPOSER contends that the mark KAT KLEEVAGE is inherently distinctive, state all facts to support OPPOSER's contention;

(h) if OPPOSER contends that the mark KAT KLEEVAGE has acquired secondary meaning, state all facts to support OPPOSER's contention; and

(i) identify all witnesses having knowledge concerning OPPOSER's responses to subparts (a)-(h) above.

Response No. 9:

(a) As shown in the documents produced by Opposer to Applicant, Opposer promotes herself in her non-commercial Internet web-site and her videos by personal appearances at trade shows and the like on behalf of the video production companies.

(b) See Response 9(a).

(c) In addition to the Response of 9(a), Opposer has appeared on the Howard Stern Show, Comedy Central and the Family Business Show.

(d) Opposer has no annual expenditures for media promotion as all such promotion expenditures are incurred by the magazines and video production companies which feature Opposer.

(e) Unknown.

(f) Opposer believes that the target audience for such promotional activities are men and women interested in large breasted adult entertainers.

(g) Opposer does not believe that the term "KLEEVAGE" is inherently distinctive alone, but believes that the mark "KAT KLEEVAGE" is distinctive of Opposer due to several years of continuous usage and the number of video products and personal appearance made by Opposer, the consuming public has come to recognize and know Opposer as KAT KLEEVAGE.

(h) See Response to paragraph 9(g).

(i) Kathryn Shaffer.

Interrogatory No. 10:

State all facts supporting OPPOSER's contentions contained in paragraph 4 of the Notice of Opposition and identify all witnesses having knowledge of those facts.

Response No. 10:

Opposer has produced in the documents copies of dictionary definitions for the term

“CLEAVAGE”, and other documents wherein the term “CLEAVAGE” and other spellings thereof refer to breasts, and particularly large breasts, in the adult entertainment industry.

Interrogatory No. 11:

State all facts supporting OPPOSER’s contention contained in paragraph 5 of the Notice of Opposition and identify all witnesses having knowledge of those facts.

Response No. 11:

Opposer believes that the documents produced in association with Opposer Response to Applicant’s First Request of Production of Documents and Things speak for themselves and answer this Interrogatory.

Interrogatory No. 12:

States all facts supporting OPPOSER’s contentions contained in paragraph 6 of the Notice of Opposition and identify all witnesses having knowledge of those facts.

Response No. 12:

See Response No. 11.

Interrogatory No. 13:

If OPPOSER contends that KAYLA KLEEVAGE is descriptive of “providing live adult entertainment pictures and performances via the web” or “personal appearances by a celebrity

adult entertainer,”

(a) states the basis for OPPOSER’s contention;

(b) state all facts supporting OPPOSER’s contention;

(c) state whether the mark KAT KLEEVAGE is descriptive of “providing live adult entertainment pictures and performances via the web” or “personal appearances by a celebrity adult entertainer,”

(d) state the basis for OPPOSER’s response to subpart (c);

(e) state all facts supporting OPPOSER’s response to subpart (c); and

(f) identify all witnesses having knowledge concerning OPPOSER’s responses to subparts (a)-(e).

Response No. 13:

Opposer does not contend that the composite mark “KAYLA KLEEVAGE” is descriptive of such goods and services, but does believe that the term “KLEEVAGE” is descriptive for such goods and services, particularly when used in association with large breasted adult entertainment models. Opposer asserts that the terms “KLEEVAGE”, “KLEAVAGE”, and “CLEAVAGE” are all descriptive of such goods and services, and that these terms are used interchangeably in the industry, as shown in the documents produced by Opposer.

Interrogatory No. 14:

With reference to paragraph 7 of the Notice of Opposition,

(a) state the basis for contending that OPPOSER will be harmed;

- (b) state all facts supporting OPPOSER's contentions; and
- (c) identify all witnesses having knowledge concerning OPPOSER'S responses

to subparts (a) and (b).

Response No. 14:

Opposer, based on prior threats, believes that she will be harmed by the registration of the mark KAYLA KLEEVAGE as Opposer believes that Applicant will attempt to prevent others from using the term "CLEEVAGE", or phonetic equivalents thereof, which are widely used not only by Opposer, but others in the adult entertainment industry.

Interrogatory No. 15:

If OPPOSER contends that there is a likelihood of confusion between KAT KLEEVAGE and KAYLA KLEEVAGE,

- (a) state the basis for OPPOSER's contention;
- (b) state all facts supporting OPPOSER's contention;
- (c) identify all instances of actual confusion of which OPPOSER is aware;
- (d) identify all channels of trade common to OPPOSER and APPLICANT in

which the marks have been used; and

- (e) identify all witnesses having knowledge concerning OPPOSER's responses
- to subparts (a)-(d).

Response No. 15:

Opposer does not content that there is a likelihood of confusion between KAT KLEEVAGE and KAYLA KLEEVAGE due to the visual and audible differences in the term KAT and KAYLA, the differences in physical appearances of the Applicant and Opposer, and the fact that Opposer is not aware of any instances of actual confusion to date.

Interrogatory No. 16:

Identify all agreements, oral or written, between OPPOSER and any other person or entity relating to the use of KAT KLEEVAGE, including, without limitation, all agreements, assignments, and licenses.

Response No. 16:

None.

Interrogatory No. 17:

Apart from this Opposition, identify all litigations, oppositions, cancellation proceedings, inter partes proceedings and/or other disputes in which OPPOSER has been involved, relating to the use of trademarks or service marks.

Response No. 17:

None.

Interrogatory No. 18:

Identify each person OPPOSER expects to call as a witness, including expert witnesses, and with respect to each such witness, state:

- (a) the subject matter on which the witness is expected to testify; and
- (b) the substance of the facts and opinions to which each witness is expected to testify and a summary of the grounds for each opinion.

Response No. 18:

Kathryn Shaffer and Kimberlee Port. Opposer reserves the right to call additional witnesses in the future.

Interrogatory No. 19:

Identify each and every person who supplied information for and/or participated in responding to these Interrogatories and Applicant's First Set of Requests for Production of Documents and Things to Opposer.

Response No. 19:

Kathryn Shaffer.

Interrogatory No. 20:

If OPPOSER's response to any of the Requests for Admissions served herewith is anything other than an unqualified admission, identify the number of the request and

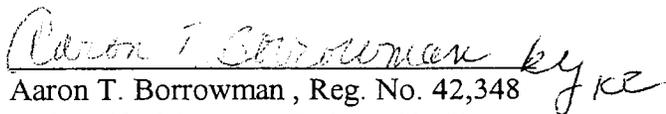
- (a) state all facts concerning OPPOSER;s response; and
- (b) identify all witnesses having knowledge concerning those facts.

Response No. 20:

With reference to Admission Request No. 5 and 6, see Response to Interrogatory No. 9 above.

Respectfully submitted,

Dated: January 26, 2004

  
Aaron T. Borrowman, Reg. No. 42,348  
on behalf of Opposer Kathryn Shaffer  
Kelly Bauersfeld Lowry & Kelley, LLP  
6320 Canoga Ave., Suite 1650  
Woodland Hills, CA 91367  
Tel: (818) 347-7900  
Fax: (818) 340-2859

**CERTIFICATE OF SERVICE**

As counsel for Opposer, I hereby certify that I caused a true and correct copy of the attached **OPPOSER'S RESPONSES TO APPLICANT'S FIRST SET OF INTERROGATORIES** to be served January 26, 2004 via U.S. first class mail, postage prepaid, upon counsel for Applicant.

Robert Ryan Morishita  
Anderson & Morishita, L.L.C.  
2725 S. Jones Blvd., Suite 102  
Las Vegas, Nevada 89146

Aaron T. Borrowman *AK*  
Aaron T. Borrowman, Reg. No. 42,348

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

KATHRYN SHAFFER,	)	In Re Application of
Opposer,	)	KLEEVCO PRODUCTIONS
	)	U.S. Trademark Ser. No. 78/206,862
v.	)	Published: October 7, 2003
	)	Mark: KAYLA KLEEVAGE
KLEEVCO PRODUCTIONS,	)	
Applicant.	)	
_____	)	Opposition No. 91158169
	)	

**OPPOSER'S RESPONSES TO APPLICANT'S  
REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Opposer Kathryn Shaffer ("Opposer") hereby responds to Applicant Kleeenco Productions ("Applicant") First Requests for Production of Documents and Things.

**GENERAL OBJECTIONS**

Opposer states the following general objections to Applicant's First Requests for Production of Documents and Things which are incorporated by reference into each and every one of Opposer's responses to the full extent applicable, even though not repeated in individual responses.

1. Opposer is responding to Applicant's discovery requests in accordance with the Federal Rules of Civil Procedure and objects to Opposer's requests for information that require

Applicant to perform tasks not required by the Federal Rules of Civil Procedure or go beyond the scope of proper discovery.

2. Opposer objects to producing documents or providing information sought by Applicant which is protected from discovery under the attorney-client privilege, the work product doctrine and/or any other applicable privilege, doctrine or immunity. This shall be a standing and continuing objection and may not be repeated in response to Applicant's individual requests.

3. Opposer objects to producing documents called for by Applicant's requests: (a) contained in documents attached to other papers filed/served in this Opposition or (b) known to be in the possession of Applicant or its counsel.

4. Opposer objects to the discovery requests to the extent they are vague, ambiguous or burdensome.

5. Opposer objects to the interrogatories and document requests to the extent they require disclosure of confidential proprietary information.

### **General Statement**

All of the following responses are based on such information as is currently known based on reasonable inquiry. Opposer reserves the right to alter, amend or supplement these responses as necessary. Subject to the foregoing, Opposer responds as follows:

Request No. 1:

If you contend that use by APPLICANT of KAYLA KLEEVAGE for “providing live adult entertainment pictures and performances via the web” or “personal appearances by a celebrity adult entertainer,” is likely to cause confusion with OPPOSER’s mark KAT KLEEVAGE, identify and produce all documents and things which support your contention.

Response No. 1:

None.

Request No. 2:

Identify and produce all documents and things evidencing your use of KAT KLEEVAGE in connection with “live adult entertainment pictures and performances via the Internet,” “personal appearances as a celebrity adult entertainer,” and any other goods/services provided by you under the mark KAT KLEEVAGE for each of the years 2000 to the present including a specimen of each use bearing the mark KAT KLEEVAGE that is used, was used, or is proposed to be used by OPPOSER and/or any licensees of OPPOSER.

Response No. 2:

After reasonable investigation, Opposer submits documents responsive to the Request herewith. See Bates Stamp Nos.P 001-P 134.

Request No. 3:

To the extent not already produced in response to Request No. 2, identify and produce all documents and things constituting or referring or relating to marketing, advertising, or promotion of goods and services offer by OPPOSER under the mark KAT KLEEVAGE.

Response No. 3:

See Response No. 2.

Request No. 4:

Identify and produce all documents and things concerning any instances of actual confusion between OPPOSER and APPLICANT concerning use of the marks.

Response No. 4:

None.

Request No. 5:

Identify and produce all documents and things establishing that KAT KLEEVAGE is inherently distinctive or has acquired secondary meaning.

Response No. 5:

See Response No. 2.

Request No. 6:

Identify and produce all documents and things concerning any licenses or assignments by OPPOSER regarding use of KAT KLEEVAGE.

Response No. 6:

None.

Request No. 7:

Identify and produce all documents relating to any trademark search or investigation conducted by, or on behalf of, OPPOSER concerning the marks KAT KLEEVAGE or KAYLA KLEEVAGE.

Response No. 7:

Opposer objects to this Request to the extent it calls for documents which are protected by attorney-client communications or the work product doctrine. Subject to these objections, the documents are submitted herewith.

Request No. 8:

Identify and produce all documents constituting or relating or referring to any market research, focus group study or survey including, without limitation, transcripts or tapes of focus

groups, made or commissioned by or on behalf of OPPOSER about goods or services used, or intended to be used, with the mark KAT KLEEVAGE.

Response No. 8:

None.

Request No. 9:

Identify and produce all documents concerning OPPOSER's selection and/or adoption of the mark KAT KLEEVAGE.

Response No. 9:

None.

Request No. 10:

Identify and produce documents sufficient to establish OPPOSER's business structure.

Response No. 10:

None.

Request No. 11:

Identify and produce all documents and things establishing OPPOSER's gross revenues from "live adult entertainment pictures and performances via the Internet," "personal appearances as a celebrity adult entertainer," and other goods/services provided by OPPOSER in connection with the mark KAT KLEEVAGE.

Response No. 11:

Opposer objects to this Request as seeking confidential and/or trade secret information.

Request No. 12:

Identify and produce all documents and things establishing OPPOSER's annual expenditures for advertising or otherwise promoting the mark KAT KLEEVAGE.

Response No. 12:

None.

Request No. 13:

Identify and produce all documents constituting or referring or relating to plans to expand the geographical area in which OPPOSER uses KAT KLEEVAGE.

Response No. 13:

None.

Request No. 14:

Identify and produce all documents constituting or referring or relating to plans to expand the goods or services with which OPPOSER uses KAT KLEEVAGE.

Response No. 14:

None.

Request No. 15:

If you contend that the mark "KAYLA KLEEVAGE" is descriptive of "providing live adult entertainment pictures and performances via the web" or "personal appearances by a celebrity adult entertainer," identify and produce all documents and things which support your contention.

Response No. 15:

The documents are submitted herewith (See Bates Stamp Nos. P 138-P 331).

Request No. 16:

Identify and produce all documents constituting or referring or relating to OPPOSER's first knowledge of APPLICANT's use of "KAYLA KLEEVAGE."

Response No. 16:

Opposer has not produced documents responsive to this Request as they emanated from Applicant and are available to Applicant.

Request No. 17:

Identify and produce all documents referring or relating to APPLICANT's use of, or application to register, "KAYLA KLEEVAGE."

Response No. 17:

See Response No. 16.

Request No. 18:

Identify and produce all documents constituting or relating or referring to national, federal, state, and local trademark, trade name, service mark, and service name applications and registrations owned, filed, or used by OPPOSER for KAT KLEEVAGE.

Response No. 18:

Such documents are publicly available through the United States Patent and Trademark Office .

Request No. 19:

Identify and produce all documents OPPOSER intends to use or introduce in any evidentiary hearing, testimony period; or trial in this Opposition.

Response No. 19:

The documents are submitted herewith.

Request No. 20:

To the extent not produced in response to Request Nos. 1 through 19 above, all documents identified, request to be identified, referred to, or relied upon in answering Interrogatories Nos. 1 thorough 20.

Response No. 20:

The documents are submitted herewith.

Respectfully submitted,

Dated: January 26, 2004

Aaron T. Borrowman *ky*  
Aaron T. Borrowman, Reg. No. 42,348 *TR*  
on behalf of Opposer Kathry Shaffer  
Kelly Bauersfeld Lowry & Kelley, LLP  
6320 Canoga Ave., Suite 1650  
Woodland Hills, CA 91367  
Tel: (818) 347-7900  
Fax: (818) 340-2859

**CERTIFICATE OF SERVICE**

As counsel for Opposer, I hereby certify that I caused a true and correct copy of the attached OPPOSER'S RESPONSES TO APPLICANT'S REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS to be served January 26, 2004 via U.S. first class mail, postage prepaid, upon counsel for Applicant:

Robert Ryan Morishita  
Anderson & Morishita, L.L.C.  
2725 S. Jones Blvd., Suite 102  
Las Vegas, Nevada 89146

Aaron T. Borrowman *Aaron T. Borrowman*  
Aaron T. Borrowman, Reg. No. 42,348

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

KATHRYN SHAFFER,	)	In Re Application of
Opposer,	)	KLEEVCO PRODUCTIONS
	)	U.S. Trademark Ser. No. 78/206,862
v.	)	Published: October 7, 2003
	)	Mark: KAYLA KLEEVAGE
KLEEVCO PRODUCTIONS,	)	
Applicant.	)	
_____	)	Opposition No. 91158169
	)	

**OPPOSER'S RESPONSES TO APPLICANT'S  
FIRST SET OF REQUESTS FOR ADMISSIONS**

Pursuant to 37 CFR 1.20 and Rule 36 of the Federal Rules of Civil Procedure, Kathryn Shaffer ("Opposer") hereby responds to the First Set of Requests for Admissions propounded by Kleeveco Productions ("Applicant") as follows:

**GENERAL OBJECTIONS**

Opposer incorporates by reference the following general objections into its specific responses to each and every Request for Admission, even though not repeated in individual responses:

1. Opposer generally objects to Applicant's First Set of Requests for Admission insofar as it purports to impose obligations beyond those set forth by the Federal Rules of Civil Procedure.
2. Opposer objects to Applicant's First Set of Requests for Admission insofar as it

seeks confidential or proprietary information protected from discovery by any applicable privilege, doctrine, or immunity, including, but not limited to, the attorney-client privilege and the work product doctrine.

3. Opposer objects to Applicant's First Set of Requests for Admission insofar as it seeks information which constitute Opposer's trade secret and confidential business information, and any such responsive information is produced herewith subject to the "Stipulated Protective Order" having been entered in this action.

4. All specific responses to Applicant's First Set of Requests for Admission are provided with the express reservation of: (a) all objections as to competency, relevancy, materiality and admissibility of the responses, the subject matter thereof, and any documents produced in response thereto as evidence for any purpose in any further proceedings in this action, including motions for summary judgment, motions for summary adjudication of issues, and the trial of this action, or in any other action; (b) all applicable privileges and the work product doctrine; (c) the right to object to the use of such responses, the subject matter thereof, or any documents produced in response thereto on any ground in any further proceeding in this action; (d) the right to object on any ground at any time to a demand or request for further responses to these or any other Requests for Admission; and (e) the right to move for a protective order to protect the confidentiality of any information or documents provided.

5. Opposer expressly reserves the right to rely on, at any time, subsequently discovered information or information omitted from these responses as a result of mistake, error, oversight or inadvertence.

6. Opposer responds to Applicant's First Set of Requests for Admission to the best of its present knowledge and only insofar as it may be deemed to have personal knowledge or information that forms the basis of any response herein. Opposer reserves the right to supplement these responses from time to time and will do so in the event that it is so required by the Federal Rules of Civil Procedure.

Request No. 1:

Admit that you have not used "KAYLA KLEEVAGE" for any goods or services provided by you.

Response No. 1:

Admitted.

Request No. 2:

Admit that you have not registered or applied to register "KAYLA KLEEVAGE" as a trademark, trade name, service mark, or service name.

Response No. 2:

Admitted.

Request No. 3:

Admit that you were aware of APPLICANT'S use of the mark KAYLA KLEEVAGE prior to adopting the mark KAT KLEEVAGE.

Response No. 3:

Denied.

Request No. 4:

Admit that you were aware of APPLICANT'S use of the mark KAYLA KLEEVAGE prior to filing U.S. Trademark Application Serial No. 76/543,254 for KAT KLEEVAGE.

Response No. 4:

Admitted.

Request No. 5:

Admit that you were not entitled to apply for registration of the mark KAT KLEEVAGE on September 8, 2003 because you believe "kleevage" is descriptive.

Response No. 5:

Denied.

Request No. 6:

Admit that your mark KAT KLEEVAGE is descriptive of your goods/services.

Response No. 6:

Denied.

Request No. 7:

Admit that there is a likelihood of confusion between OPPOSER'S mark KAT  
KLEEVAGE and APPLICANT'S mark KAYLA KLEEVAGE.

Response No. 7:

Denied.

Dated: January 26, 2004

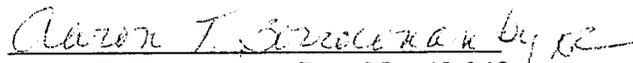
Respectfully submitted,

Aaron T. Borrowman <sup>by</sup> *HK*  
Aaron T. Borrowman, Reg. No. 42,348  
on behalf of Opposer Kathryn Shaffer  
Kelly Bauersfeld Lowry & Kelley, LLP  
6320 Canoga Ave., Suite 1650  
Woodland Hills, CA 91367  
Tel: (818) 347-7900  
Fax: (818) 340-2859

**CERTIFICATE OF SERVICE**

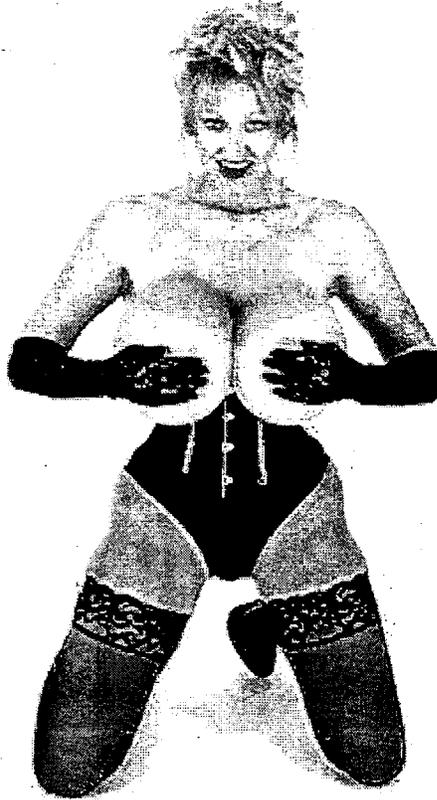
As counsel for Opposer, I hereby certify that I caused a true and correct copy of the attached **OPPOSER'S RESPONSES TO APPLICANT'S FIRST SET OF REQUESTS FOR ADMISSIONS** to be served January 26, 2004 via U.S. first class mail, postage prepaid, upon counsel for Applicant.

Robert Ryan Morishita  
Anderson & Morishita, L.L.C.  
2725 S. Jones Blvd., Suite 102  
Las Vegas, Nevada 89146

  
Aaron T. Borrowman, Reg. No. 42,348

Applicant's Responses to Opposer's Request for Documents, Request No. 5

# Kayla Kleeveage



You must be over the age of 18 to go beyond this point!  
These pages may contain nudity and/or strong language. The material is of an adult nature and is not intended for minors. Under no circumstances are persons under legal age (as defined by the individual state or municipality) to view this material. Misrepresenting your age in order to gain access to this site may be a violation of local, state and federal law.

*I, the undersigned, under penalties of perjury, solemnly declare and affirm the following:*

1. I am an adult, being at least 18 years of age.
2. I am not accessing this material to use against the site operator or any person, whomsoever, in any conceivable manner.
3. I will not redistribute this material to anyone, nor will I permit any minor, or any other person who might find such material personally offensive, to see this material.
4. I subscribe to the principles of the First Amendment, which holds that free adult Americans have the right to decide for themselves what they will read and view, without governmental interference. Enter

Enter Guests....

Members....

## Join!

....



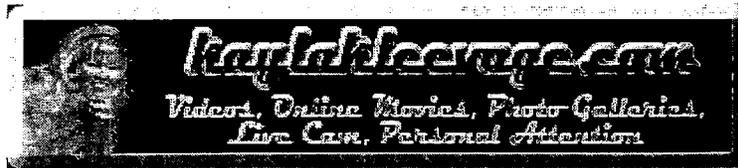
Online Tech Support

©1999 All images and text - Kleeveage

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Kayla Kleeveage, Kleeveage and John Port Productions are trademarked.

Site managed as of 5/14/99 by Mimi Miyagi Inc.



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Forgot your password or have subscription questions?

Guests

Members

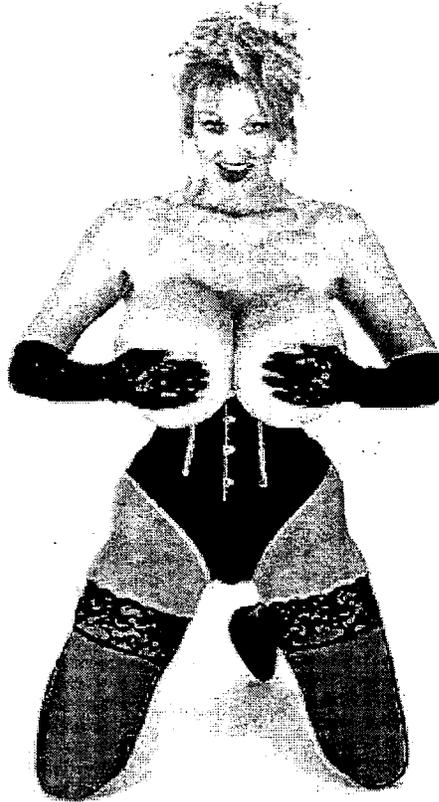
©1999 All images and text - Kleeveco All rights reserved - No use without written permission Kayla Kleevage, Kleeveco and John Port Productions are trademarked. Site managed as of 1/1/01 by Kayla Kleevage.

U.S.C. Title 18, Section 2257 Compliance!

CYBERSitter



# Kayla Kleevage



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Enter Guests....

Members....

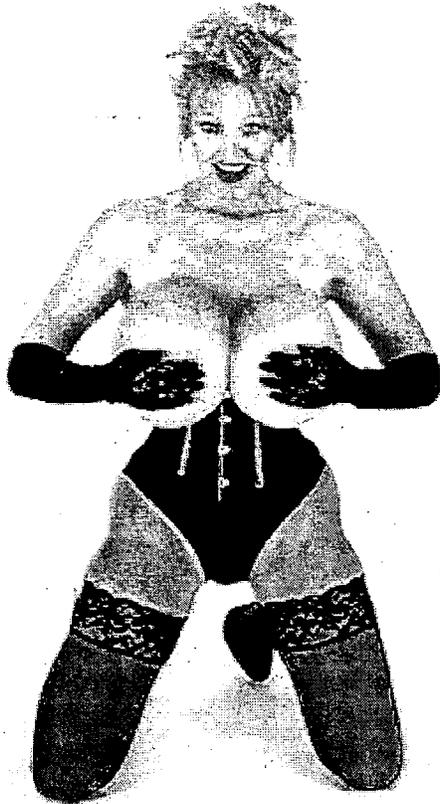
## Join!



**Forgot Your Password Or Have Subscription Questions?**

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# Kayla Kleevage



..

....

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Join!

Enter Guests

Members.

CYBERSitter™



**Forgot Your Password Or Have Subscription Questions?**

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Site managed as of 1/1/01 by Kayla Kleevage.

# THE TOTAL MAN PLEASER KAYLA KLEEVAGE

FEATURE DANCER ADULT VIDEO STAR MAGAZINE MODEL



Adult material should be for adults only!  
Please No Kids!



Support Free Speech

I am over 18 years of age.

**I WANT TO SEE MORE!**

Protect your kids on the Net  
**SURFWATCH**



**Cyber Patrol**  
TO SURF AND PROTECT

**CYBERsitter™**

---

Best Viewed 800 X 600 16-Bit Color

© Kleevco Productions All Rights Reserved  
Questions?

Webmaster@kleevage.com



# Kayla Kleevage

International Adult Film Star  
& The Girls of Kleevco

Presented by Kleevco Productions

---

**\*\*You must be at least 18 years old.\*\***

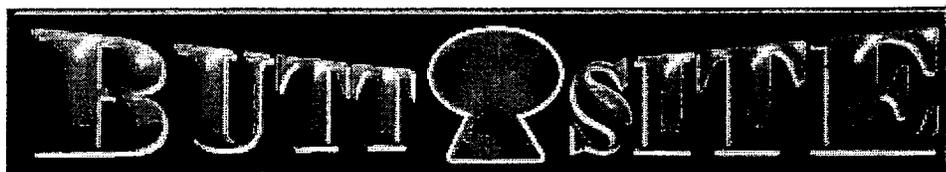
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***Enter KLEEVCO***

We at Kleeveco are concerned about the possibility of children being able to access sexually-explicit materials through this World Wide Web site. We have done everything in our power to make sure this does not happen. To learn how you can lock out this site and other adult sites from children, please click any of the logos below for complete information on this important topic. Thank you!

**Adult material should be for adults only.**



*No Kids!*



CYBERsitter™

**This Web site was designed using Netscape Gold.**



Webcounter says you are visitor

**359261**

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# Kayla Kleevage

International Adult Film Star  
& The Girls of Kleeenco

Presented by Kleeenco Productions

---

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*No Kids!*



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Kayla Kleevage  
International Adult Film Star  
&  
The Girls of Kleevco  
Presented by  
Kleevco Productions

---

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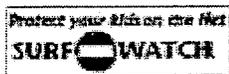
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# THE TOTAL MAN PLEASER KAYLA KLEEVAGE

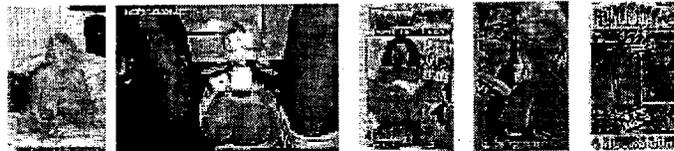
FEATURE DANCER ADULT VIDEO STAR MAGAZINE MODEL



If you cannot see the above ticker tape please enable your Java Engine.

## Six New Kleevco Videos Were Just Added!!

"Hot Chocolate"  
"Smoking, Shaving & Masturbating"  
Anal Rama The Big Tits-Anal Vol 12



Over 40 Videos in Stock!



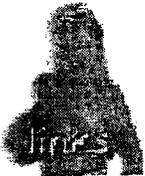
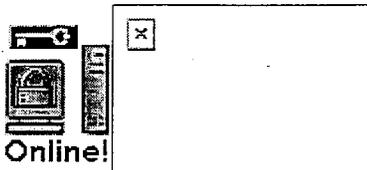
Get Instant Access  
Over 1,796 Original Images!  
On 01/08/98

(32) XXX Images of Kayla & Hot Chocolate

"How Did They Ever Fit?"

Were Added..

Kleevco Now Offers Secure Credit Card Ordering



---

## TALK TO KAYLA

---

Kayla Kleevage is one of the hottest adult entertainers on the planet today! Described by many as a Total Man Pleaser, Kayla is known to have one of the most likable personalities in the feature industry. A native of Wisconsin, Kayla now splits her time between Houston and San Diego. "Between the club appearances, my video career, "KLEEVAGE" magazine and Kleevco Productions I manage to stay pretty busy". Enjoy my web site as if it were my body and don't forget to check out the Girls of Kleevco. I've already checked each one out myself! So I know you will enjoy them.

---

QUOTE: "It's a tits and ass world and I love it!" TURN OFFS: User unfriendly programs and mean people TURN ONS: S.R.O. performances, men who can shoot a stream of sperm across the room. FAVORITE T.V. SHOW: Beavis & Butthead FAVORITE SPORTS: Winston Cup, N.H.R.A., Indy car or anything that burns nitro! PETS: Two studio cats, Sony and Koda, they hold down the fort when I'm on the road. FAVORITE FOOD: Lobster and Godiva Chocolate POLITICAL VIEW: Freedom to make my own choices.... BUSINESS MOTTO: To satisfy customers KLEEVCO (The Kleevage Company) is always interested in new models. Feel free to e-mail any questions about Modeling, the Feature Biz, agents or photography and I will do my best to get you the right answers.

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# *"The Total Man Pleaser"*

## *Kayla Kleevage*

*FEATURE DANCER  
ADULT VIDEO STAR  
MAGAZINE MODEL*

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Love Always, *Kayla*

---

**QUOTE:** "It's a tits and ass world and I love it!"

**TURN OFFS:** User unfriendly programs and mean people

**TURN ONS:** S.R.O. performances, men who can shoot a stream of sperm across the room.

**FAVORITE T.V. SHOW:** Beavis & Butthead

**FAVORITE SPORTS:** Winston Cup, N.H.R.A., Indy car or anything that burns nitro!

**PETS:** Two studio cats, Sony and Koda, they hold down the fort when I'm on the road.

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**POLITICAL VIEW:** Freedom to make my own choices....

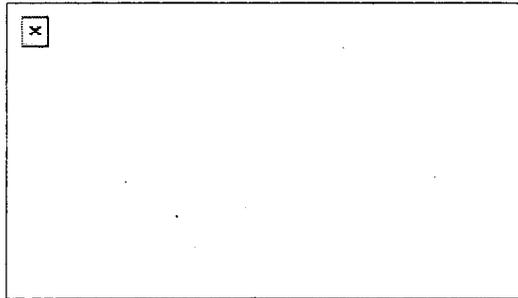
**BUSINESS MOTTO:** To satisfy customers KLEEVCO (The Kleevage Company) is always interested in new models. Feel free to e-mail any questions about Modeling, the Feature Biz, agents or photography and I will do my best to get you the right answers.

NEW

# How would you like to be Kayla's Assistant on the next video/Photo Shoot?

## Four New Club Dates Added 11/13/96

### Check Out ButtsrUs



#### LUMINA VIDEO STORE

The Tool Pushers Video  
just added  
12/22/96

A complete library of Kayla Kleevage adult videos, some videos of my Giant Jugged girlfriends (I actually watch these videos, so I know the good ones) and videos that I produce myself here at Kleevco. Browse around and let me know your comments.

#### GIRLS OF KLEEVCO

25 New images of  
Melanie Goode added 12/29/96

A download link of Kleevco Models.  
Currently over 550 high quality images.  
Last Update 01/01/97

- |            |                   |  |
|------------|-------------------|--|
| Aspen Alps | Paris             | Lulu Divine                            |
| Angel Bust | Jessica           | Colt 45                                |
| Chanel     | Marilyn Hightower | Madison Moons                          |
| Dallas     | Kayla & Minka     | Boob Fetish                            |
| Fetish     | Tyra              | <input type="checkbox"/> Melanie Goode |

#### KAYLA'S KEEPSAKES

List of Products and prices

#### KLEEVAGE MAGAZINE

"Kleevage" is published four times a year and features lots of behind-the-scenes stories from the dance circuit and loads of photos of girls with giant sized tits!

#### CLUB BOOKINGS

Where I will be appearing in person. How to contact my booking agency.  
Book me "Dano"

#### T.V. APPEARANCES

Past and future TV appearances

#### PHOTO OF THE MONTH

Changes Monthly 01/04/97

#### MODEL OF THE MONTH

Check out a featured model of the month! 11/13/96

#### KLEEVAGE LINKS

Check out some of my favorite sites.

web hosting by  
MAK Inc.  
cookie@makinc.com

# THE TOTAL MAN PLEASER KAYLA KLEEVAGE

**FEATURE DANCER ADULT VIDEO STAR MAGAZINE MODEL**



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## TALK TO KAYLA

Don't Forget to Check-Out My New Poster!

Like Big Boobs & Nice Butts?

Now see them both together

New at

The Girls of Kleevco!

Get Instant Access

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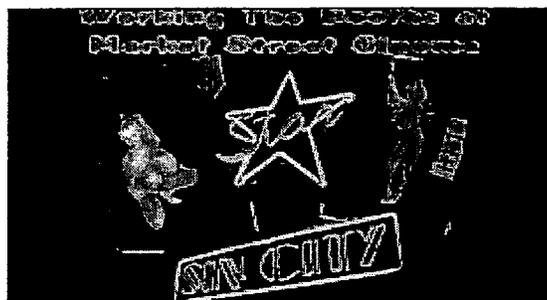
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## Tour Schedule



Nov. 20-25, 2002		I will be home in Las Vegas.
Nov. 26-Dec. 4, 2002		I will be performing at the <b>Market St. Cinema</b> on Market St. In <b>San Francisco</b> . My showtimes are 12:30, 5:30, 8:30 and 11:30 daily. My first show is at 1:30 instead of 12:30 on Sunday.
Dec. 5, 2002		I will be home in Las Vegas.
Dec. 6-9, 2002	Date Moved	I will be in <b>Chicago</b> . Please email me for more details.
Dec. 9-10, 2002		I will be home in Las Vegas.
Dec. 14-15, 2002		<b>Houston</b> -Please email me for more details.
Dec. 16-23, 2002		<b>Unavailable</b>
Dec. 24-Jan. 2002		I will be home in Las Vegas.
Feb. 2002		<b>Quebec City</b> -More Info Coming Soon!

## Tour Schedule



Mar. 9-18, 2003	I will be home in Las Vegas.
Mar. 19-25, 2003	I will be in San Francisco performing at the Market Street Cinema
Mar. 26-April 2, 2003	I will be home in Las Vegas.
April 9-12, 2003	I will be in Atlanta. Email me for more details!
April 13-22, 2003	I will be home in Las Vegas.
April 23-27, 2003	I will be at the Laughlin River Run in Laughlin, Nevada .
April 28-May 4, 2003	I will be home in Las Vegas.
May 5-10, 2003	I will be performing at BlackJack's in Streamwood, IL. Details coming soon!
May 29-June 2, 2003	Somewhere in that time frame I will be back in Houston. Email me for more details.
June 18-24, 2003	I will be in San Francisco performing at the Market Street Cinema
Oct. 1-7, 2003	I will be in San Francisco performing at the Market Street Cinema
Dec. 10-16, 2003	I will be in San Francisco performing at the Market Street Cinema

*tour schedule*

---



## The Month of March

by Kayla Kleeve

March 1 Home in Las Vegas

March 2-6 Home in Las Vegas for Kleeveco Photo Shoot with Echo Valley

March 7 Leave for San Francisco

March 8-14 I will be performing at the Market Street Cinema at 1077 Market St. in San Francisco, CA. I will also be performing across the street at L.A. Gals. Please email me or call the Cinema at 415-861-2727 for showtimes.

March 15 I come back home to Las Vegas

March 16-18 I will be home in Las Vegas

March 19 I leave for New York City

March 20-25 I will be performing at New York Dolls on Murray Street in New York City (located in the Wall St. District). My showtimes will be at 12:15, 6:15, 9:15 and 12:15 Mon-Fri. On Saturday my showtimes are at 9:30, 12:00, 1:00 and 2:30 a.m..

March 26-28 I will be hanging around in New York City

March 29 I come back home to Vegas

March 30-31 I will be home in Vegas

March 20-30 Kleeveco photo shoot with Casey James-I hope I get home early enough to fit some pics with Casey and I together!

| [BACK](#) |

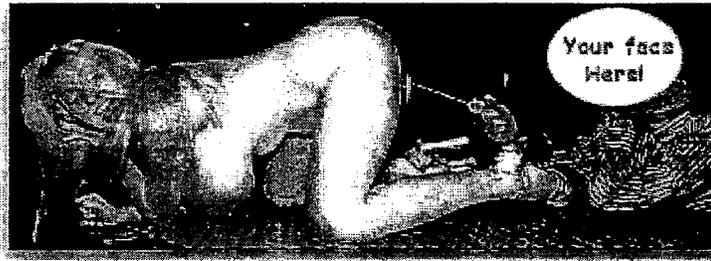
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### Archive

Select an Archive:  and click

*tour schedule*

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## Tour in Los Angeles

### The Industrial Strip Gentlemen's club

by Kayla Kleevage

I will be performing this Friday and Saturday (June 23 & 24) at "The Industrial Strip Gentlemen's Club" at 6872 Farmdale Ave., N. Hollywood. The showtimes are 10:00p.m and 12:00 a.m. The phone number is 1-800-978-7479. I love this club! I had such a blast! I'm going to try to start autograph and private dance sessions early because I didn't get a chance to accomadate everyone last time I was there. I am going to stay over an extra day or two to attend to some business matters. After that I will be back home in Vegas until further notice due to the construction of my new live webcam and streaming video websites.

Love,

Kayla

| [BACK](#) |

---

### Archive

Select an Archive:  and click

## *tour schedule*

---



### **Winter Tour Schedule**

by Kayla Kleevage

November 22nd thru December 12th I'll be home in Las Vegas celebrating Thanksgiving with Minka and Sierra. Happy Gobble, Gobble Day!

December 13th thru 18th I'll be working at Private Eyes in N.Y.C. The club is on W.45th Street in Manhattan. My showtimes are 1:00, 6:00, 9:00 and 12:30

December 19th thru 21st I'll be hanging out in N.Y.C.

December 23rd thru January 3rd I will be spending Christmas in Las

Vegas. Merry Christmas and Happy New Year!

January 4th thru 7th I will be attending the Consumer Electronics Show and AVN Awards at the Las Vegas Convention Center in Las Vegas, NV. Come by and visit me, Minka and Chelsea at the "Freedom of Speech" booth.

January 7th The T&A 2000 Party! See my homepage for details. Tickets are going fast so don't miss out on this Millenium Blowout Party!

January 12th thru 18th I will be working at The Market Street Cinema on Market Street in San Francisco, CA. My showtimes there might vary a bit because I will be doing shows on the mainstage and the Playland stage. "Come have fun in Playland!". Chelsea Charms will be appearing on the bill with me that week also.

January 19th thru 23rd is time for another Kleeveco Video shoot in L.A.

After that folks, it's anybody's guess!

| [BACK](#) |

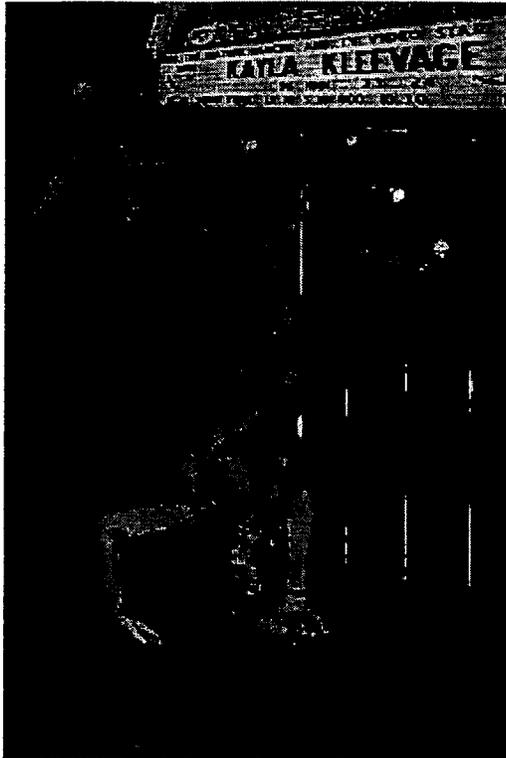
---

### Archive

Select an Archive:  and click

*tour schedule*

---



## Summer Dance Appearance Schedule

by Kayla Kleevage

July 25th thru July 31st

Alex's Club

Stoughton, Mass.

August 2nd thru Aug. 7th

Franks Chicken House

Manville, NJ

August 9th thru Aug 14th

Private Eyes W. 47th St.

New York City, NY

August 15th thru Aug. 18th

New York City/photo shoot

August 19th thru Aug.26th.

Home in Houston

August 29th thru Sept.5th

Exotic Dancer Expo

Ceasar's Palace

Las Vegas, NV

I'll be in the Universal Entertainment Booth at the Expo and look for me in the Kayla Kleevage Booth (of course) for Fan Fair along with Colt 45 and some other close friends!

September 7th thru Sept. 15th

Market Street Cinema

1077 Market Street

San Francisco, CA

Other dates will be posted as soon as they are confirmed.

| [BACK](#) |

---

## Archive

Select an Archive:  and click



## Archive

Here is a comprehensive listing of all Kayla Kleevage Online files that are available for viewing:

## Tour Schedule

- **Calgary, Alberta**  
*Kayla Kleevage*  
July 8-13, 2002
- **Chicago**  
*Kayla Kleevage*  
March 4-8, 2002
- **Chicago**  
*Kayla Kleevage*  
March 4-8, 2002
- **Dec. 17, 1999**  
*Kayla Kleevage*  
Market Street Cinema
- **Des Moines, Iowa**  
*Kayla Kleevage*  
November 12-17
- **February 16-19, 2000**  
*Kayla Kleevage*  
Gentleman's Quarters--Baldwin, NY
- **I'm Here In San Francisco!**  
*Kayla kleevage*  
October 11-18
- **Jacksonville, Florida**  
*Kayla Kleevage*  
April 3-6, 2001
- **January 16-22, 2002**  
*Kayla Kleevage*  
San Francisco, CA
- **July 8-11 and July 12-15**  
*Kayla Kleevage*

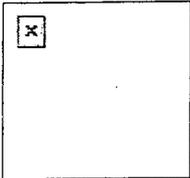
Washington D.C. and Boston

- **June 26-July 2, 2002**  
*Kayla Kleevage*  
San Francisco
- **Milwaukee, Wisconsin**  
*Kayla Kleevage*  
Dec. 17-27, 2001
- **New York City**  
*Kayla Kleevage*  
Feb. 4-9, 2002
- **New York City**  
*Kayla Kleevage*  
August 20-25, 2001
- **Oct. 25 - Nov. 3**  
*Kayla Kleevage*  
I Will Be In Miami and the Florida Keys!
- **Phoenix and I Will Be Performing In San Francisco**  
*Kayla Kleevage*  
May 3-9
- **San Francisco, CA**  
*Kayla Kleevage*  
May 16-22, 2001
- **September 27, 1999**  
*Kayla Kleevage*  
September-October Itinerary
- **Summer Dance Appearance Schedule**  
*Kayla Kleevage*  
Summer Dance Appearance Schedule
- **The Month of August**  
*Kayla Kleevage*  
New York City
- **The Month of March**  
*Kayla Kleevage*  
San Francisco, New York City and Lots of Photo Shoots!
- **Tour in Los Angeles**  
*Kayla Kleevage*  
The Industrial Strip Gentlemen's club
- **Winter Tour Schedule**

*Kayla Kleevage*  
November-January 2000 Tour Schedule

# Club Bookings

# Kayla Kleevage



---

● *February 1st - 6th 1999*  
*Flash Dancers on Broadway*  
*New York City, NY*

---

● *February 9th - 13th 1999*  
*Franks Chicken House*  
*New Jersey*

---

● *February 17th - 20th*  
*The Golddust*  
*Charlston W. Virginia*

---

● *March 31- April 6th 1999*

**The Market Street Cinema  
San Francisco, CA**

---



---

*Club owners and managers, If you would like me to  
appear at your club or video store please  
email me at [kleevage@aol.com](mailto:kleevage@aol.com) for information.*

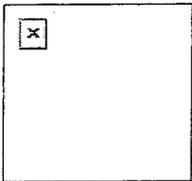
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# Club Bookings

# Kayla Kleevage



---

● **March 31- April 6th 1999**  
**The Market Street Cinema**  
**San Francisco, CA**

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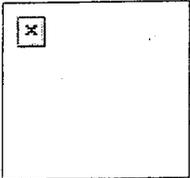
*Club owners and managers, If you would like me to appear at your club or video store please email me at [kkleevage@aol.com](mailto:kkleevage@aol.com) for information.*

---



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*Club Bookings*  
**Kayla Kleevage**



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● *Nov. 30th-Dec.5th*  
*The Tex Mex Lounge*  
*McAllen, TX*

---

● *Dec. 26th-Jan.4th*  
*The Bunny Ranch*  
*Carson City NV*  
*It's located 5 miles East*  
*of Carson City on Hwy. 50.*  
*The phone no. is 702-246-FUCK*

---

Club owners and managers, If you would like me to appear at your club or video store please email me at [kkleevage@aol.com](mailto:kkleevage@aol.com) for information.



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*Club Bookings*

# Kayla Kleevage



---

● **My Birthday!**

**April 20th**

**Send Cards, Letters & Gifts to:**

**Kayla Kleevage**

**1436 W. gray Street**

**#914**

**Houston, TX 77019**

---

● **Kleevco Video Shoot**

**April 22nd - April 25.**

**Los Angeles, CA**

---

● **Market Street Cinema**

**April 29 -May 5th**

**1077 Market Street**

**San Francisco, CA.**

*Back again to my most favorite club and favorite city!*

---

● **Temptations**

**May 13th - 16th**

22nd & Craycroft

**Tucson, AZ.**

520.790.0709

---

● **Babes East**

**Indy 500 Race Week**

**May 17th - 23rd**

7259 Pendelton

**Indy, Indiana**

---

● **New York Dolls**

**June 8th - 13th**

259 Muray Street

**NY, NY.**

---

● **Pleasure Island**

**June 17th - 20th**

253 Rt. 17K

**Newburgh, NY.**

---

● **Gentlemens Club Expo**

**Sept 8 - 10th**

Tropicana Hotel & Casino

**Las Vegas, NV.**

---

● **Exotic Dancer Fan Fair**

**Sept 11th - 12th**

Tropicana Hotel & Casino

**Las Vegas, NV.**

*I look forward to seeing everyone at this wonderful event!*

---

● **Market Street Cinema**

**Sept 30th - Oct 6th**

1077 Market Street

**San Francisco, CA.**

*Back again to my most favorite club and favorite city!*

---

**Club owners and managers, if you would like me to**

appear at your club or video store please  
email me at [kkleevage@aol.com](mailto:kkleevage@aol.com) for information.



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## Club Bookings

# Kayla Kleevage

• Flashdancers in NYC

Jan. 19-24

Broadway and 53rd ST.

Showtimes: 1:00-6:00-9:00-12:00

---

• Market Street Cinema

April 29-May 5th.

San Francisco, on Market St.



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Club owners and managers, if you would like me to appear at your club or video store please email me at [kkleevage@aol.com](mailto:kkleevage@aol.com) for information.

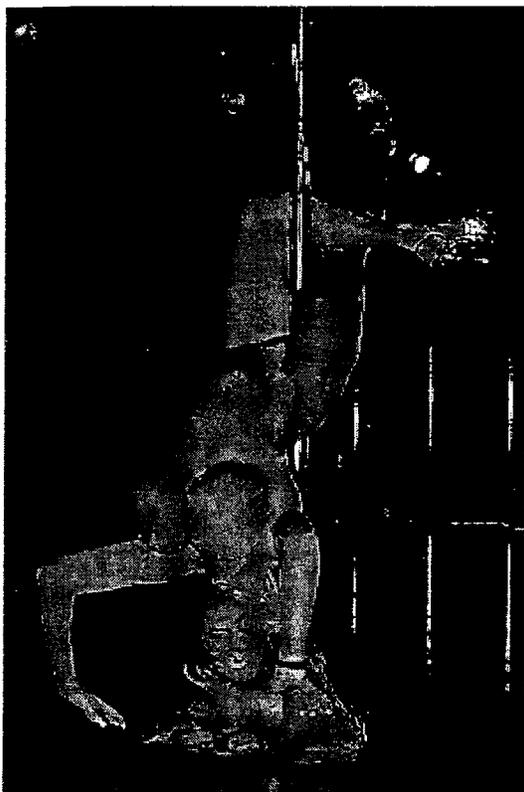


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## Club Bookings

# Kayla Kleevage



### •Cheaters

Providence, RI  
June 16 thru 21st

### •Franks Chicken House

Manville, NJ  
June 24 thru 28th

### •Flashdancers

Broadway N.Y.C.  
June 30th thru July 5th

### •London, England

SCORE photo shoot with Minka  
July 18th thru 24th

### •Gentlemen's Club Expo

Las Vegas, NV  
Sept 4

### •East Coast Video Expo

Atlantic City, NJ  
Oct. 7th thru 9th

### •Market Street Cinema

San Francisco, CA  
date to be announced

Club owners and managers, if you would like me to appear at your club or video store please email me at [kkleevage@aol.com](mailto:kkleevage@aol.com) for information.

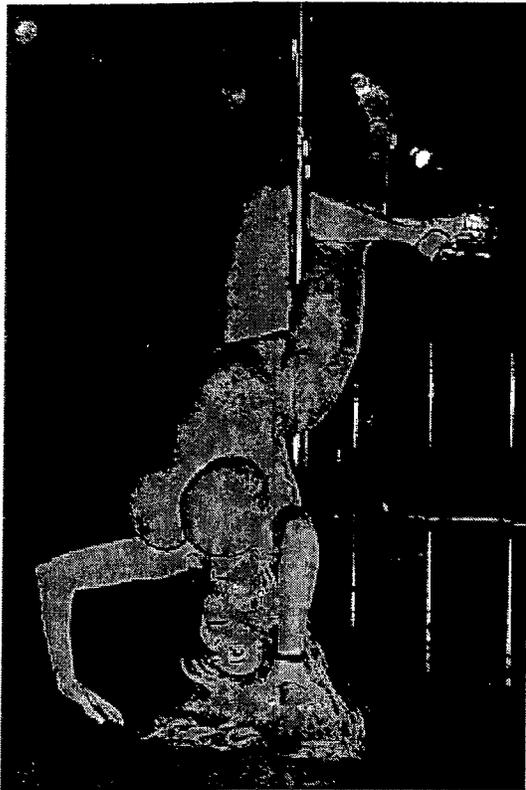


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# Kayla Kleevage

## Club Bookings

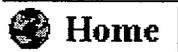
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- *AVN Awards, CES Show - Las Vegas, NV  
Jan 9th - 12th*
- *Wild J's Las Vegas, NV Jan. 17th and 18th*
- *The Kit Kat Club, Sunnyvale, Cal. (408)-733-2628, Jan. 22-25*
- *The Maket Street Cinema, San Fransisco, Feb. 12th thru 19*
- *Crazy Horse Anchorage, Alaska Feb 24 thru Mar 1st*
- Rusty's Edmonto, Alberta, Canada March 3 thru 8*
- *The French Maid Calgary, Alberta, Canada*

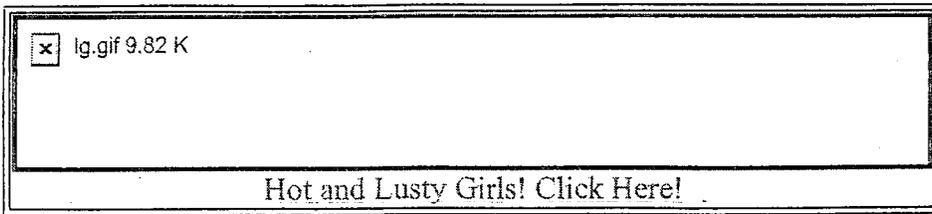
*March 10 thru 15*

*For Club Bookings please e-mail [kkleevage@aol.com](mailto:kkleevage@aol.com)*



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**: *Adult Film Stars News* :**

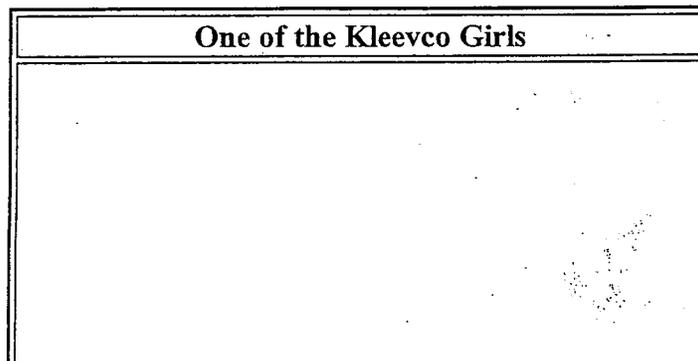
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*Kayla Kleevage and the Kleevco Girls - More Than a Handful!*

**Kleevco Productions was founded by Kayla Kleevage, the Total Man Pleaser. Kayla is an Adult Star, Feature Dancer and Magazine Model who decided to bring her world to the net.**

**Kayla's site is full of information and packed with pictures. Not only are there pictures of Kayla, but tons of photos of the Kleevco Girls.**





Kayla publishes Kleevage Magazine which is a quarterly publication - you can take a peek at the magazine on the site. The magazine includes photos and info about her upcoming events.

All videos for sale on the site are personally autographed by Kayla and include her productions as well as others. Kayla Keepsakes is where you can purchase panties, posters, bras, stockings, custom photos and more.

The member area of Kayla's site includes a feature of the month, thumbnails of 17 different photo sets, and the "Butts of Kleevco" - you can guess what that contains!

Also check out Kayla's Club Bookings so you can catch her close to home.

Visit Kayla soon...She's Sure to Please



**CLICK HERE to see these pictures for FREE!**

---

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TiarraCorp.

Download over **38** full-screen nude images of **Kayla Kleevage** in the HotBOX!

## Kayla Kleevage

Kayla Kleevage is one of the hottest adult entertainers on the planet today! Described by many as a Total Man Pleaser, Kayla is known to have one of the most likable personalities in the feature industry. A native of Wisconsin! Kayla now splits her time between Houston and San Diego. Between the club appearances, her video career, "KLEEVAGE" magazine and Kleeveco Productions Kayla seems to stay pretty busy". Kayla also loves stock car racing, seafood and old John Wayne westerns and says the perfect guy would "see past my boobs and love me for who I am."



**Danni's**  
**HOTBOX**

What's Next  
 Models  
 Photographs  
 Audio & Video  
 News  
 Danni's Club  
 Fun Stuff

Contact

**Danni's**  
**HOTBOX**

### Kayla Kleevage's Special Features:

- [Exclusive interview with Kayla Kleevage](#)

### Kayla Kleevage's Photo Sets in the HotBOX:



Minka & Kayla  
Kleevage  
[15 images](#)



Sunshine Girl  
[13 images](#)



Gorgeous On Gold  
[10 images](#)

### Videos featuring Kayla Kleevage:

- [Big Boob Celebration](#)
- [Big Boob Lottery](#)
- [Duke of Knockers](#)
- [Girls Around the World #13](#)
- [Letha Weapons and Friends](#)
- [Mega Babes](#)

### Kayla Kleevage's Stats:

- Measurements: 36HH-24-34
- Height: 5' 7"
- Birthday: April 20th
- Home Town: Houston, TX

Kayla Kleevage's Fan Club

<http://web.archive.org/web/19990220180025/models.danni.com/models/mod138.html>

1436 W. Gray St. #914  
Houston, TX 77019

Kayla Kleevage's Official Web Site

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Download 23 full-screen - high resolution - nude images of *Kayla Kleevage* in the **HOT BOX!**

 Exclusive Interview with Kayla in the **HotBOX!**

## Kayla Kleevage



Kayla Kleevage is one of the hottest adult entertainers on the planet today! Described by many as a Total Man Pleaser, Kayla is known to have one of the most likable personalities in the feature industry. A native of Wisconsin!

Kayla now splits her time between Houston and San Diego. "Between the club appearances, her video career, "KLEEVAGE" magazine and Kleeveco Productions Kayla seems to stay pretty busy".

Kayla also loves stock car racing & old John Wayne westerns and says the perfect guy would "see past my boobs and love me for who I am"

### Kayla's Appearance Schedule

- CES Show in January

### Kayla Appears in the Following Videos

- Big Boob Lottery
- Duke of Knockers
- Girls Around the World #13
- Big Boob Celebration
- Letha Weapons and Friends

### And in the Following Magazines

- September '93 SCORE
- September '96 SCORE

*Kayla Kleevage Fan Club  
2437 Bay Area Blvd #357  
Houston, TX 77058*

Kayla's Official Home Page

*Home Models Magazines Danni*

List yourself in the EmailAddress Directory!

It's Free!

http://www.emailaddress.com

ASOARD  
COMMUNICATIONS



# Celebrity Photos

Women of the Silver Screen, Picture Box & Print Media

Last update: May 26, 1997

## Directory

- [Vixen of the Week](#)
- [Athletes](#)
- [Sapphic Delights](#)
- [Amateurs](#)
- [Kink](#)
- [Asian Women](#)
- [Frott Art & Photography](#)
- [Transgender](#)
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- [Celebrity Photos](#)

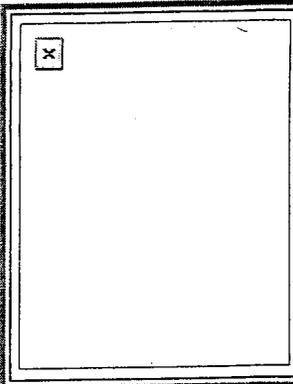
- [Charles' House of Celebrities](#) -- Lot's of photos to drool over!!!
- [Cindy and Claudia](#) -- ~1 picture of either Cindy Crawford or Claudia Shifford.  
Two URL addresses don't work. The name link does though.
- [Crazy Sexy Cool](#) -- Selection of celebrity photos
- [Cyberbeauties](#) -- The best naked Celeb Page on the net...
- [Deeper Inside Hollywood](#) -- Excellent free celebrity pics!!
- [Dope Fiend](#) -- A free site featuring a great selection of celebrities...
- [Erica](#) -- 1 picture of a Erica
- [Famous Hot Babes](#) -- Free celebrity photos: Demi Moore, Madonna, Stevie Nicks, & more.
- [Fine Black Women!](#) -- View and vote on the finest of Black women.
- [FREE Hot Nude Celebrities](#) -- Only the best looking celebrities nude.  
Updated often.
- [Hollywood Exposed](#) -- They didn't want you to see this!
- [Jenny McCarthy Gallery](#) -- ~30 pictures of MTV personality Jenny McCarthy
- [Jessie James' Photo Gallery](#) -- adult film star - no preview!
- [Jordan Lee](#) -- Visit the anal queen of porn!
- [Judy](#) -- 5 pictures of Judy wearing leather
- [Kayla Kleevage](#) -- Some free süper photos & pay site \$25/yr. Video Store, Magazine & more.
- [MagiC One](#) -- Nude Celebrities
- [My Bettie Page page](#) -- ~10 images of pin-up queen Betty Page
- [Pam Anderson](#) -- 36 pictures of Pamela Lee Anderson. Most nude.
- [Paul's Photo Gallery](#) -- girls, top models, playboy and penthous pics., photo gallery
- [Pic of the Day](#) -- Free pics of Nude celebs and supermodels...
- [Salma.com](#) -- The Ultimate Salma Hayek Website
- [SaRenna Lees's Sweet Samples](#) -- Bring her into your home - over 200 images cumming soon!!!
- [Supermodels](#) -- All models, all the time!
- [The Best of Stephanie Seymour](#) -- Here it is!
- [The Betty Page Photo Gallery](#) -- Photos of 1950s most famous pinup
- [Traci Topps](#) --
- [Xena:Warrior Princess](#) -- Free site. Xena is on a mission to help people free

*themselves from tyranny. Chat rooms.*



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For information please send email to:  
[Info@paladinweb.com](mailto:Info@paladinweb.com)



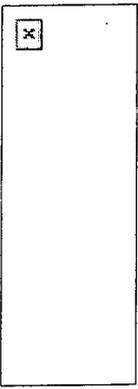
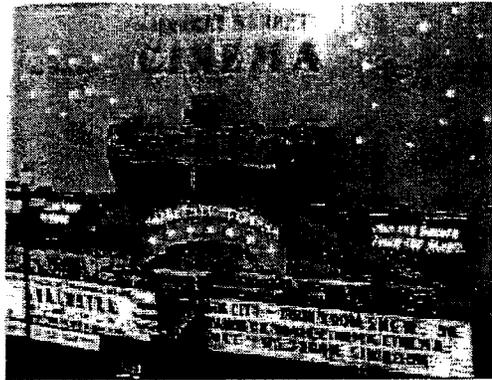
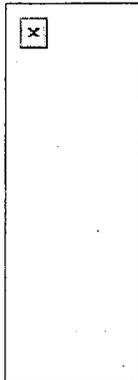
# MARKET STREET CINEMA



- [Home](#)
- [Schedules](#)
- [Day Shift](#)
- [Nigh Shift](#)
- [Features](#)
- [Now Appearing](#)
- [Coming Soon](#)
- [Our Dancers](#)
- [Tour](#)
- [Parking Map](#)
- [Suggestion Box](#)
- [Now Hiring](#)

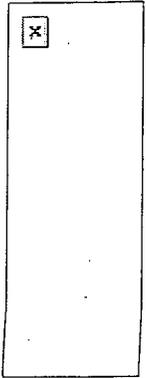
**WELCOME TO MARKET STREET CINEMA !!!**

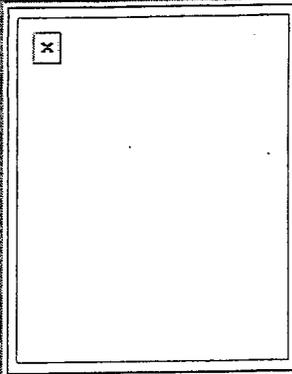
**GOOD NEWS! WE ARE OPEN UNTIL 4:00AM.**



1077 Market St. (Between 6th & 7th) San Francisco  
CA94103 Tel: 415-2551005/415-8612727

<b>HOURS:</b> Mon - Sat: 11:30am - 3am Sunday: 12:00pm - 3am	<b>ADMISSION:</b> Main Theater \$15 Sin City \$15
Open 7 days a week	Ticket is good all day





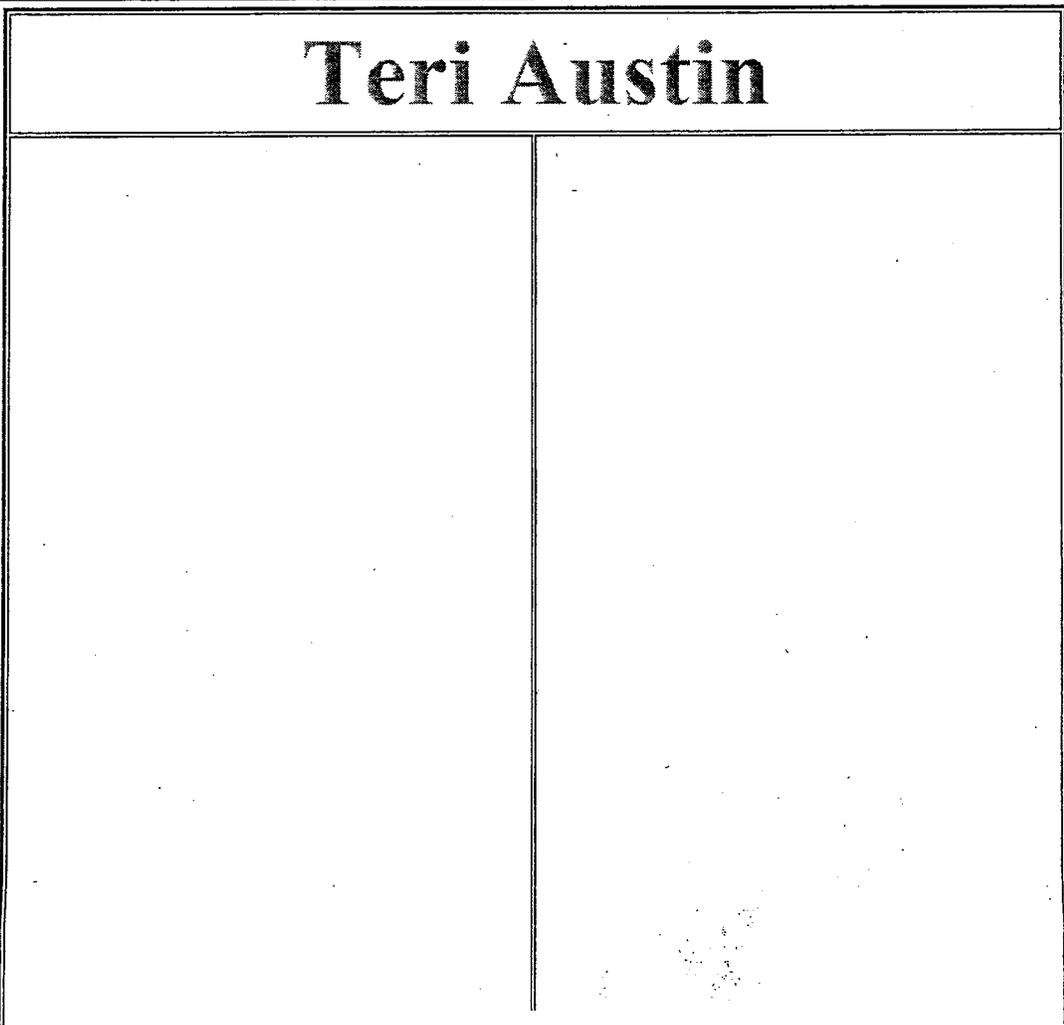
# MARKET STREET CINEMA



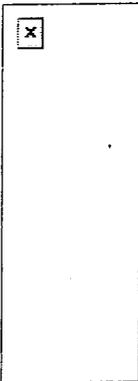
## Now Appearing Market Street Cinema

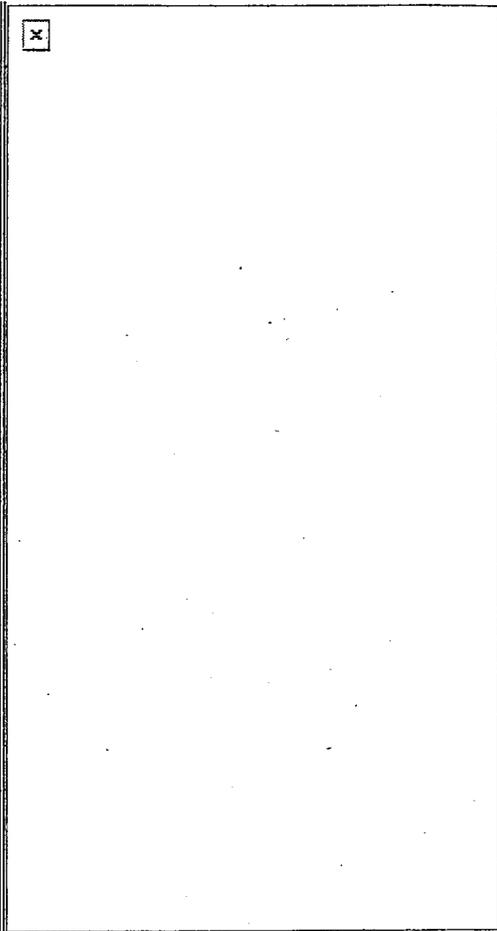
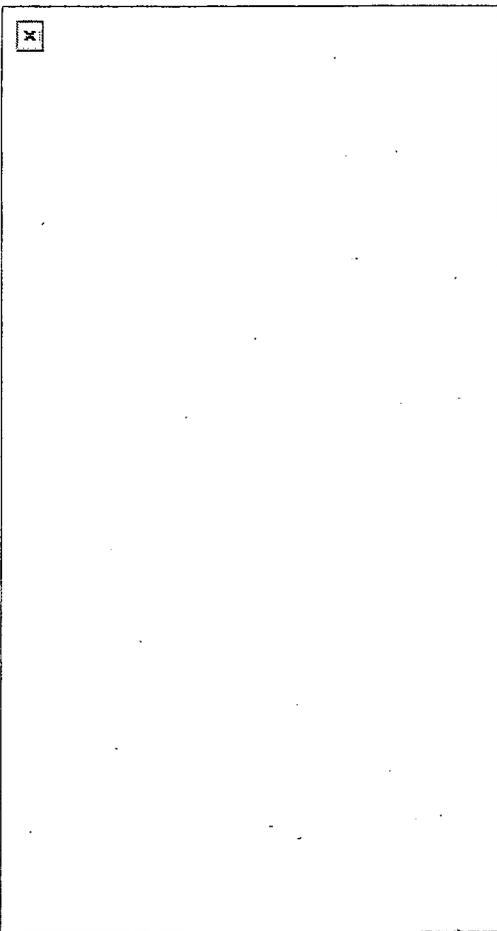
*Oct.11-Oct.17*

### Teri Austin



- [Home](#)
- [Schedules](#)
- [Day Shift](#)
- [Nigh Shift](#)
- [Features](#)
- [Now Appearing](#)
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- [Our Dancers](#)
- [Tour](#)
- [Parking Map](#)
- [Suggestion Box](#)
- [Now Hiring](#)





# Kayla Kleevage



**Kayla Kleevage**

UNIVERSAL  
CINEVISION  
1999-2000

# Bubbles

# Tigra

x

x



# MARKET STREET CINEMA



Home

Schedules

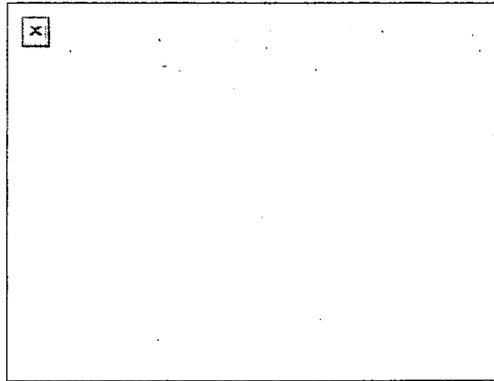
Day Shift  
Night Shift

Features  
Now Appearing  
Coming Soon  
Our Dancers  
Fantasy Menu

Tour  
Parking Map  
Suggestion Box  
Now Hiring

**WELCOME TO MARKET STREET CINEMA !!!**

**GOOD NEWS! WE ARE OPEN UNTIL 4:00AM.**



1077 Market St. (Between 6th & 7th) San Francisco  
CA94103 Tel: 415-2551005/415-8612727

<b>HOURS:</b> Mon - Sat: 11:30am - 3am Sunday: 12:00pm - 3am	<b>ADMISSION:</b> Main Theater \$15 Sin-City \$15
Open 7 days a week	Ticket is good all day



# MARKET STREET CINEMA



[Home](#)

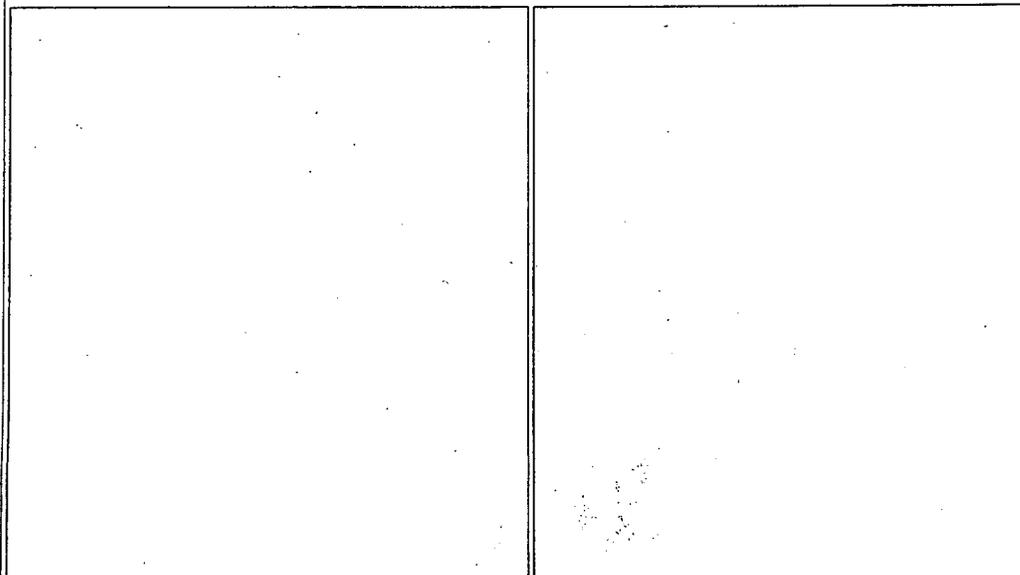
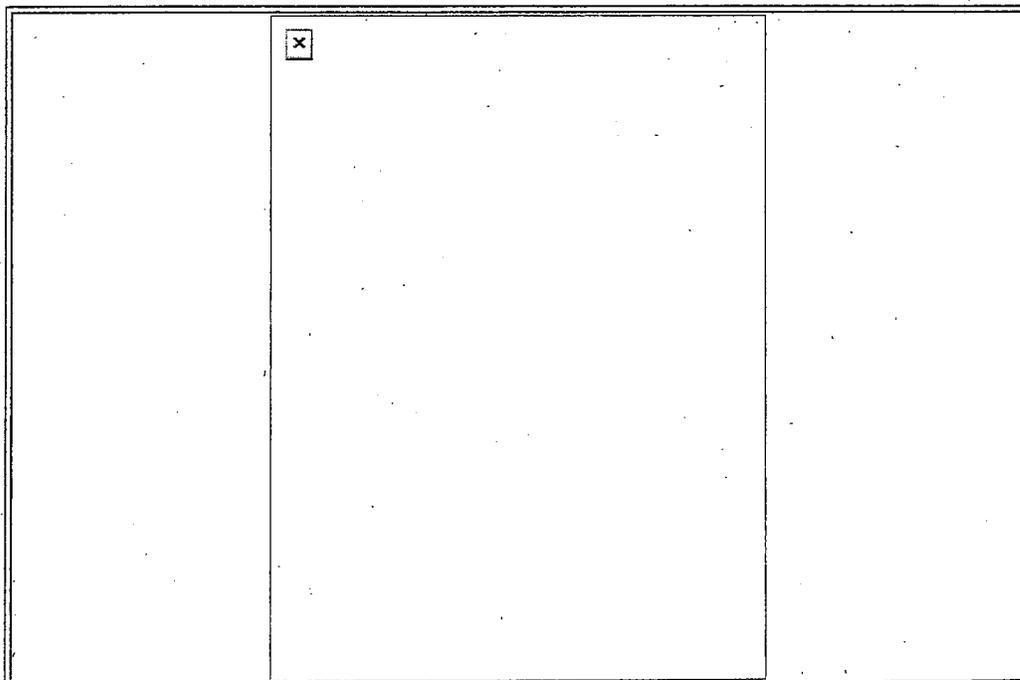
[Schedules](#)

[Day Shift](#)  
[Night Shift](#)

[Features](#)  
[Now Appearing](#)  
[Coming Soon](#)  
[Our Dancers](#)

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[Parking Map](#)  
[Suggestion Box](#)  
[Now Hiring](#)

## *Now Appearing*





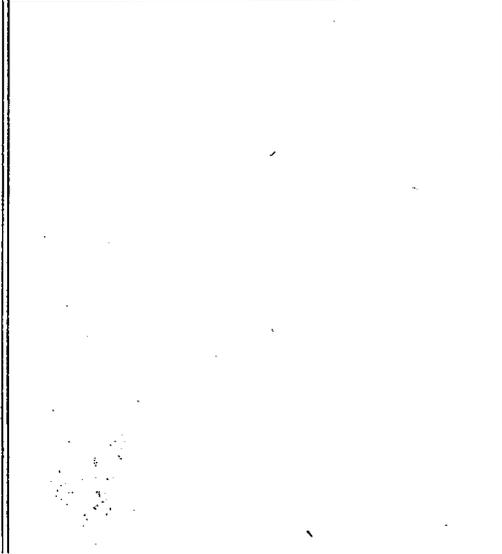
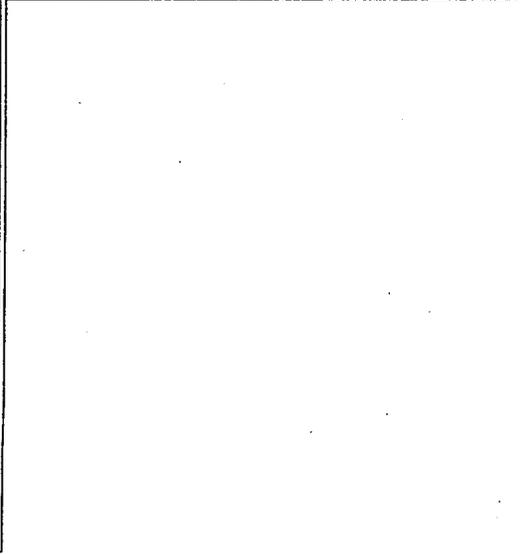
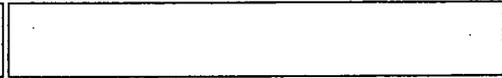
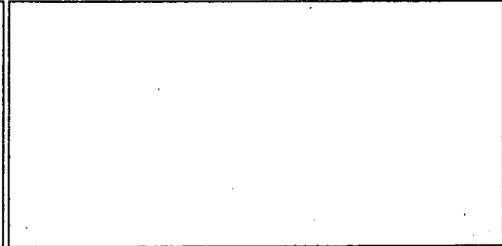
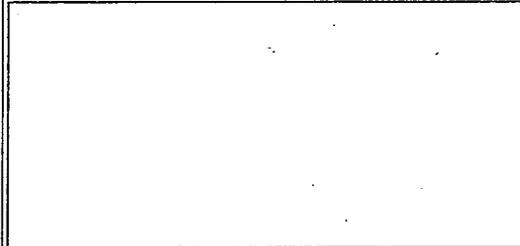
**Kayla Kleevage**

UNIVERSAL  
ENTERTAINMENT  
© 2003 UENR-TV-10



**Kayla Kleevage**

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# Frank's Chicken House

From Exotic to Erotic

Stylish Nude Entertainment

**KAYLA  
KLEEVAGE**

Kayla's Home Page

XXX Video Super-Star  
Best European Video 1996  
22 Magazine Covers  
18 Centerfolds



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WE BOOK OVERSEAS!!**

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The Magazine of the Adult Nightclub Industry

August 2001

# EXOTIC DANCER

[www.exotic-dancer.com](http://www.exotic-dancer.com)

## Bulletin

Collector's Edition  
\$10.00



### Alisha Lee

**Lights, Camera, Action!**

THE  
EXPO  
2001  
ISSUE

**NCE**  
association of club executives

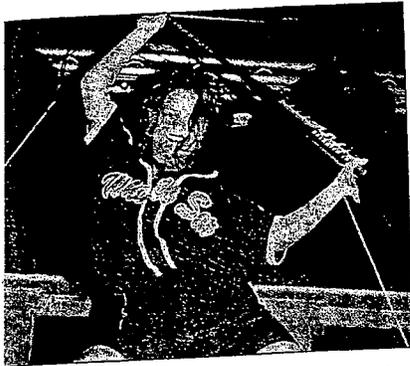
State of the Union

KP 77

**LEWIS BRIEF:  
Dancer Hits a Home Run**

LA: When it was discovered that Cal State Fullerton softball player Leilani Rios was posing nude at an Anaheim, CA, gentlemen's club, she was issued an ultimatum—quit the team or leave the team. She elected to keep the job and was forced off the team.

Originally, the school justified Rios' suspension from the team because she had violated the school's "Athlete's Code of Conduct" requiring that Cal Fullerton athletes portray a "positive image of Titan student athletes." But that code surely must have seemed hypocritical to Rios and school officials. After all, members of the Cal Fullerton baseball team were the ones who "ratted" on Rios—they noticed her dancing while patronizing the club, wearing their baseball uniforms.



But not for long. After threatening a lawsuit against the school, university officials decided that Rios should be allowed to join the team. The decision to let Rios back on the team was made after lawyers reviewed the issues and realized that her employment at the club was both legal and constitutionally protected expression.

Send your fans & agents home with your picture!  
**Publicity Prints**

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- BigBustContent.com
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- Booty Babies
- JCP Ltd Photography
- Website Layouts
- Magazine Layouts
- Feature Dancer Promotions
- 1999 Big Bust Entertainer Of The Year
- Columinist for Busty Beauties and Bachelor Magazines

KLEEVAC EARTHLINK  
OFFICE 702.240.2563

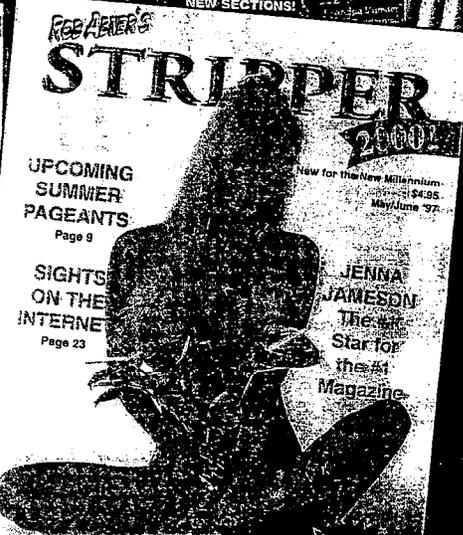
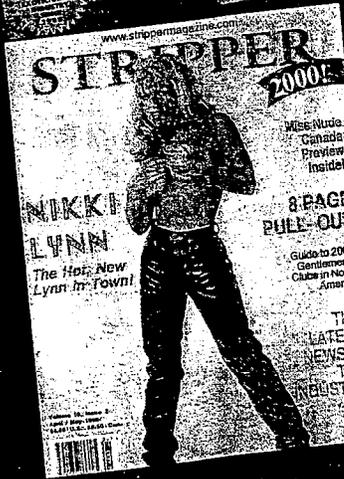
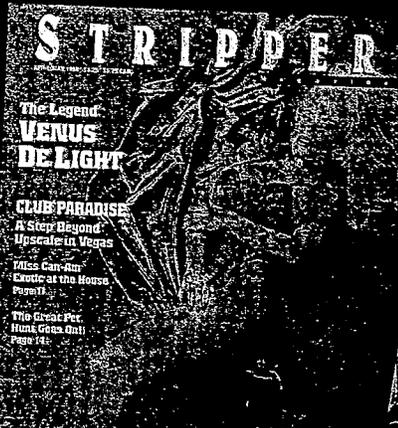
Kayla is Reresented by Universal Entertainment 908.704.7242

THE TRADE MAGAZINE OF THE EXOTIC INDUSTRY

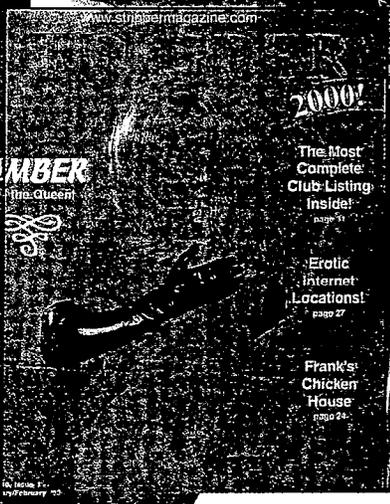
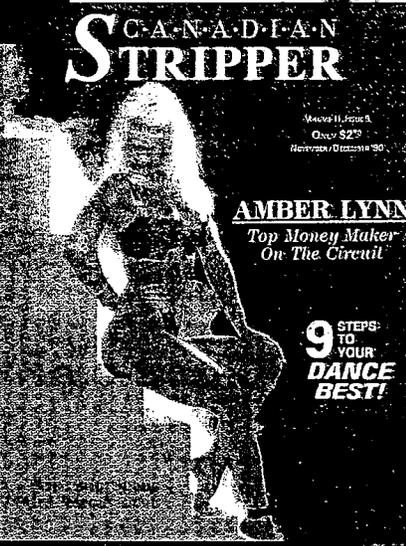
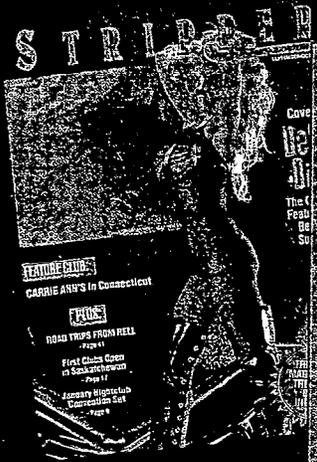
# STRIPPER

MAGAZINE

VOL.12 ISSUE 1  
AUGUST/SEPTEMBER 2000  
US 5.95



**TOOTSIE'S  
CABARET:  
MISS  
NUDE USA  
PAGEANT  
COVERAGE**



KP 79



**OUR 12TH YEAR**

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KP 81

*fax*

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# THE TOOL PUSHERS



Kenia Stevage

Kenia Stevage is a  
model and actress.  
She has appeared in  
several television shows  
and movies.

**EXOTIC DANCER CONVENTION 2002 LAS VEGAS NV.**



**KAYLAKLEEVAE.COM**



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Flibertige*

120 XXX Movies  
250 Magazines  
350 Club Appearances  
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## **The Body Shop**

1066 Poquonock Rd., Groton  
445-1556

Sept. 6th, 7th, 8th Wed., Thurs., Fri

### **KAYLA KLEEVAGE**

72-24-34

XXX Rated Films & Magazine Star  
Seen In: Bust Out, Hustler's Busty Beauties & Gent.  
Seen On: Sally Jesse Raphael, Montel Williams,  
Howard Stern, Robin Byrd & 48 Hrs.

**Showtimes: Wed. & Thurs-8:00 pm & 10:00 pm  
Fri.-5:00 pm, 8:00 pm, 10:00 pm, 12:00 Midnight**



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proudly presents

International Model • Cover Girl • Performer • Actress

**EXECUTIVE  
LUNCH BUFFET  
BUY 1 GET 1  
FREE**  
Mon., Tues., Wed

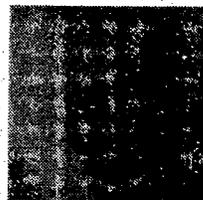
## KAYLA KLEEVAGE

52xxx • 24 • 36

Here All Week

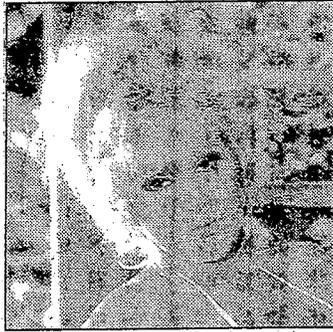
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SHOWGIRLS DAILY**

**PERSONALIZED TABLE DANCING**



25540 Miles Rd. • (Corner of Richmond & Miles) • For Information Call 360-4664

**APPEARING AUG. 15-20**



**KAYLA KLEEVAGE**

**KAYLA  
KLEEVAGE  
70 HHH-24-36  
MAJOR MAGAZINE  
AND VIDEO STAR  
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653-0199**

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7251 Theodore Dawes Rd.

**LIVE NUDE REVIEW**

THE  
**PALACE**

MIAMI'S ONLY TOTALLY NUDE SPORTS BAR.

*THE SEXIEST SHOW IN TOWN*  
*In Person.*

**Oct. 25th-30th**

**Kayla  
Kleevage  
92KKK**

**Hustler's  
Busty  
Beauties**



**4 Shows Daily Starting 6:30 p.m.  
Open 11:00 a.m. till 5:00 a.m. Daily  
Happy Hour 11 a.m.-8 p.m.  
2 for 1 Drinks**

**19995 S. Dixie Hwy.  
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 6030 PASSYUNK AVE. 724-8508  
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 COMPLETE ADULT COMPLEX  
**99¢ VIDEO RENTALS**  
 • PRIVATE SESSION ROOMS  
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**VIDEO SALE \$9.95**

MC, VISA, Discover, MAC

**Appearing This Week!**  
 Shows Mon-Thurs. Noon, 4, 8 & 12; Extra Show Fri. & Sat. at 10 PM

**75HHH-24-36!!**  
**KAYLA KLEEVAGE**  
 XXX Rated Star  
*Plus*  
**EURO STYLE SHOWS!**  
 B & D, TV's, Girl & Girl

Mon-Thurs. at 2, 6, 10 PM  
 Fri. & Sat. at 2 & 6 PM



**BIG EARL'S  
GOLD MINE**

**THIS WEEK!**  
**KAYLA  
KLEEVAGE**  
96 HHH-23-34  
at 4:30, 7:30, 10, 12

**BOTTOMLESS - TOPLESS**  
Cover Chg. - 3-7, \$5, 7-3, \$8



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Just 1-1/2 mi S of I-90 on 2nd Ave. Big Earl's

4745 NW 2nd AVE  
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Open  
Sun. 5:30 pm-2 am



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Sept. 6th, 7th, 8th Wed., Thurs., Fri.

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72-24-34

XXX Rated Films & Magazine Star  
Seen In: Bust Out, Hustler's Busty Beauties & Gent  
Seen On: Sally Jesse Raphael, Montel Williams,  
Howard Stern, Robin Byrd & 48 Hrs.

**Showtimes: Wed. & Thurs 8:00 pm & 10:00 pm**  
**Fri. -5:00 pm, 8:00 pm, 10:00 pm, 12:00 Midnight**



# KAYLA KLEEVAGE

Adult Video Superstar

12/12-12/17 Showtimes 1, 5:30, 9:30 & 12



**FREE** burgers, grilled chicken  
fries, 11-2pm Mon.-Sun.

**\$2.50** 11-7 Daily  
10 oz. Drafts, 8 oz. highballs

4875 W. Lawther @ NW Hwy.

NO COVER  
11-7

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**MARKET ST. CINEMA**  
1077 Market St • 821-2727

# KAYLA KLEEVAGE

**MEGA-  
NAMS!**



**96HH-23-34**

**PLUS SF LIVE & SIN CITY!**

CINEMA STAGE: 12:30-5:30-8:30-11:30PM

BANGKOK ROOM: NON-STOP SEX ACTION

THE TEX MEX Gentleman's Club Proudly Presents

Magazine Model, Feature  
Dancer & Adult Video Star

**Kayla  
Kleevage  
95HHH**

**Nov. 30 - Dec. 5**

**3 Shows Nightly**

8 P.M.

10 P.M.

12 A.M.



**N.E. CORNER OF JACKSON AND OWASSA RD.  
McALLEN EDINBURG 686-9673**

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# ON THE BORDER

Featuring some of the finest cigars in Milwaukee



Don't miss my  
Wed., Thurs, & Fri.  
12:45 Matinee's

## STAG PARTIES...

Free Entry After 6 & Before 9 p.m. Fri. & Sat.  
● Only 10 min. north of Racine (Just off I-94) 

NOW OPEN SUNDAYS at 6pm

COMING SOON

## Kayla Kleevage

Oct. 26<sup>th</sup> - 31<sup>st</sup>

As seen in Bust Out, Score  
Hustler, Busty Beauties & More

**FREE Hat on Mondays!**  
Limit 1 per customer

**FREE Lunch Buffet Daily**  
Open at 11:30 am

on going shows all day

**10741 S. 27<sup>th</sup> Street**  
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NIGHT

# YOU GET MORE BANG FOR YOUR BUCK "ON THE BORDER"

Sing Parties  
**FREE!**  
Every Fri. & Sat.  
6pm-9pm

**FREE  
LIMO  
SHUTTLE!**

## BIG BUSTED MONTH



**FREE  
LUNCH M-F  
11:30 AM TIL  
2 PM**

**KAYLA KLEEVE**  
Oct. 26th - 31st

**XXXENA**  
Nov. 2nd - 7th

**3 SHOWS NIGHTLY - FRI. MATINEE SHOW 12:45P.M.**

**FREE ADMISSION!**  
For Any Bachelor Parties Before  
9 p.m. • SATURDAY Only

Let Us Cater Your Next Golf Outing,  
Office Party Or Special Event!

# ON THE BORDER

SHOWGIRL  
Entertainment

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OPEN  
SUNDAYS!**

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ALL MAJOR CREDIT CARDS ACCEPTED  
ATM MACHINE  
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134 Parking Spots (Bus & Semi Parking Available)  
15 - 20 Girls Nightly  
Open at 11:30am Daily And Saturdays  
Sundays 6 p.m.

**HURRY IN FOR YOUR FREE  
CAMOUFLAGE ON  
THE BORDER HAT**

(While Supplies Last)  
Everyone's Wearing Them!  
Limit 1 per customer w/coupon.  
MONDAY ONLY!

Page 38 HAPPENINGS October 22, 1998



# HAL

Spe



# cheaters

TOPLESS

**THIS WEEK!**  
THRU SATURDAY,  
DEC. 16:  
THE WORLD'S  
MOST FAMOUS  
PORN STAR!

Never A  
Cover  
Before  
6PM!

Always  
A Free  
Show at  
5:30!

*Wayla Kleevage*



98HHH-23-34  
"JUGS OF JOY!" "BIG BOOBS  
CELEBRATION!" YOU'VE SEEN  
HER ON HOWARD STERN, 48  
HOURS, AMERICAN JOURNAL! SHOWTIMES: 5:30-9:00-11:00



New  
Management

# FRANK'S CHICKEN

# HOUSE

Stylish Nude  
Entertainment

NUDE  
Exotic to the  
Erotic



Tue-Sat 5/28 thru 6/1

**Kayla Klevage**

XXX Film Star

"Hot To Trot"

"White Satin Nights"

115KKK- 24 - 34

**FLASH DANCERS** NEW YORK  
**DOLLS**  
**100 INTERNATIONAL  
TOPLESS DANCERS!**



**KAYLA KLEVAGE**  
**88-23-34**  
**NEVER A COVER OR  
ADMISSION CHARGE**  
SHOWS: 1, 6:30, 9 & MID  
DCA#553656

**WALL STREET AREA**  
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**NEVER AN ADMISSION CHARGE! (212) 227-8912**  
**MON-SAT: NOON TO 4AM, SUN 6PM TO 4AM**

# HOME OF THE STARS

★ STAGE ★ SCREEN ★ MAGAZINE



COVERGIRL • CENTERFOLD  
INTERNATIONAL SHOWSTOPPER

## KAYLA KLEAVAGE

November 1st - November 6th

88HH - 24 - 36

5 Shows Nightly 6 • 8 • 10 • 12 • 1:30  
Gambell Street Only!

**DANCERS AT 4 PM DAILY!**

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16th & Gambell  
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Lots of Free Parking  
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**CRAZY HORSE TOO**  
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**OPEN  
7  
DAYS  
A  
WEEK!**

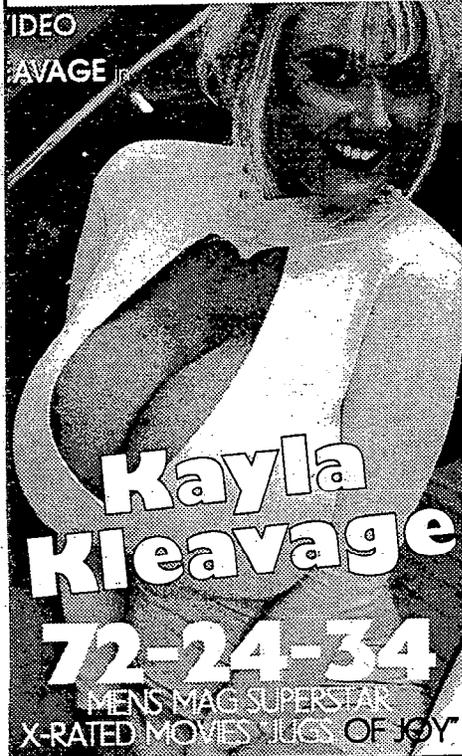
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RI's Only LEGAL all Nude Lounge!  
Intimate & Comfortable!  
**ALL NUDE TABLE DANCING!**

Open 3:30 till closing

COMING NEXT WEEK  
MONDAY, JUNE 5TH THROUGH  
SATURDAY, JUNE 10

VIDEO  
AVAGE



**Kayla  
Kleavage**  
**72-24-34**  
MENS MAG SUPERSTAR  
X-RATED MOVIES 'LIGNS OF JOY'

## cheaters Bachelor Parties!

PUT THE GROOM IN THE SHOW!



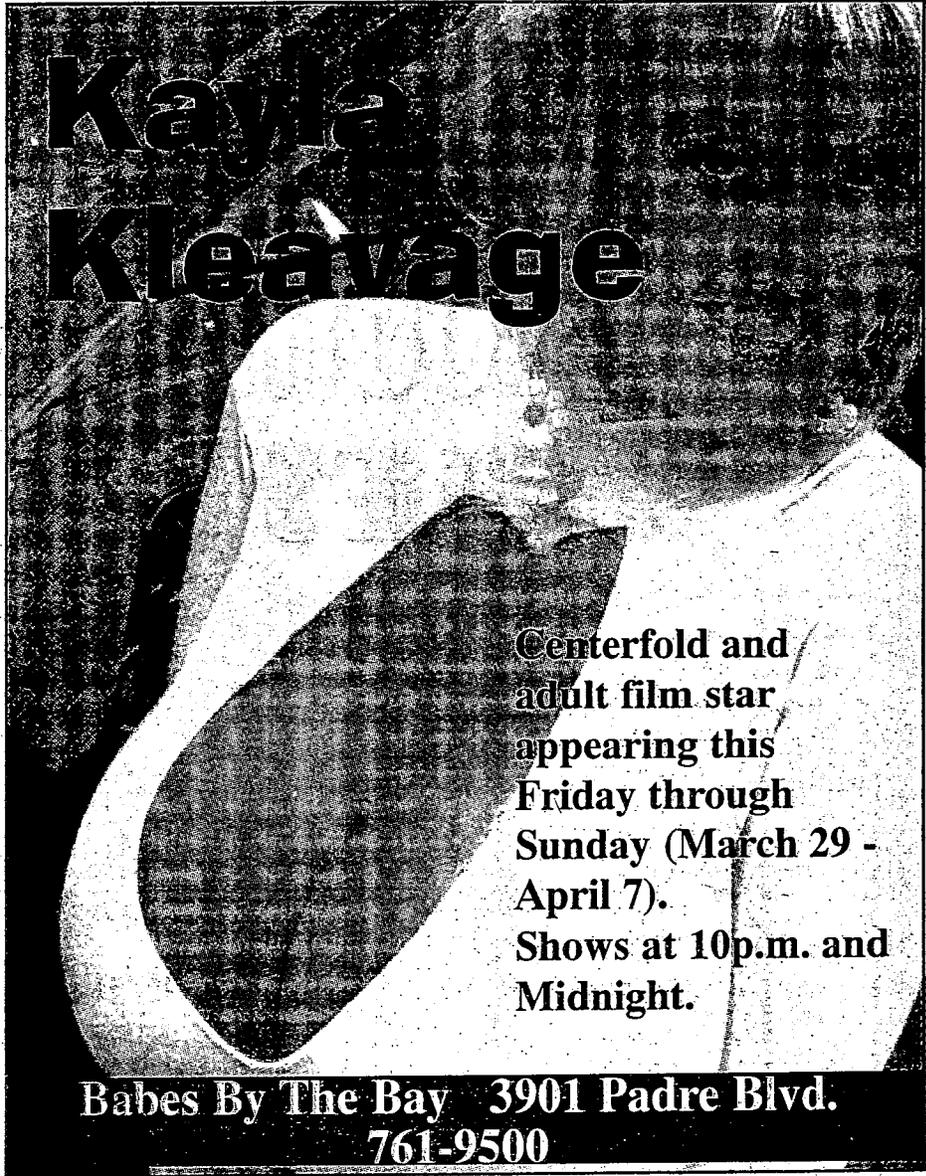
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FOR THE  
BACHELOR!

CALL CHUCK OR RICHARD (401) 941-8310  
ENTERTAINERS WANTED! CALL CHUCK OR RICHARD

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## Fantasy Booth

WITH YOUR FAVORITE  
ENTERTAINER!



# Kayla Kleavage

Centerfold and  
adult film star  
appearing this  
Friday through  
Sunday (March 29 -  
April 7).  
Shows at 10p.m. and  
Midnight.

**Babes By The Bay 3901 Padre Blvd.  
761-9500**

# NOW APPEARING

**Tonight And Tonight Only!!  
Fantastic Double Feature**



**DEENA DUOS**

98XX-24-36

Men's Magazine

Super Star

Bigger Than Life!

**KAYLA KLEEVAGE**

70HHH-24-36

Major Magazine

And Video Star



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Starting  
Tomorrow  
Jan. 23-28



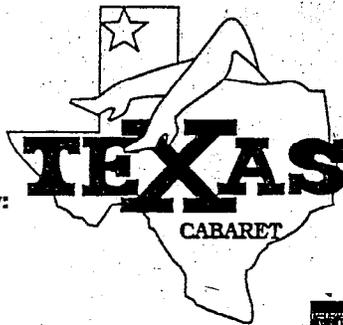
Kayla Klevage  
106-HH-23-34  
3 Shows Nightly  
Cheri Hustler  
Busty Beauties

**Come And Enjoy The 25 Of  
The Most Beautiful Dancers  
7 Days A Week!**

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Hours: Monday - Sunday:  
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Come To The World Famous

# FLASH DANCERS

## 100

TOPLESS DANCERS



**KAYLA  
KLEVAGE**  
**88-23-34**

SHOWTIMES:  
1, 6, 9 & MIDNIGHT  
DCA#551764

### BROADWAY

BETWEEN 52ND & 53RD STREETS  
MON TO SAT NOON TO 4AM, SUN 8PM TO 4AM  
DISCOUNT PARKING (212) 315-5107

**NEXT WEEK!**

**AS SEEN ON  
HOWARD STERN**

MAY 20 TH  
THROUGH MAY 25

*Kayla  
Kleeavage*

**72-24-34  
XXX STAR!**



**Cheaters**



**Bachelor  
Parties**

**Put the Groom  
in the Show!!!**

**Call Richard for details  
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**245 ALLENS AVE. ~ PROVIDENCE R.I. 941-8310**

**OPEN 7 DAYS ~ 11:30AM TILL CLOSE**

**CAMICHIN III PROUDLY PRESENTS**



**KAYLA  
KLEEVAGE**

95HHH-23 • 34  
Feature Dancer - Model  
- TV Video Star

**3 Shows Nightly**  
Jan. 28 Thru Feb. 4

**3 SHOWS NIGHTLY**  
**JAN. 28 - FEB. 4**

**MAGAZINES**

Hustler Busty Beauties  
Bust Out  
Cheri  
Gent  
Gem  
Gallery  
Buxom  
Fox  
Bang  
Close Shave  
Shaved  
Paradise  
Electric BLue  
A V N  
Outlaw Biker

Easy Riders  
D-Cup  
Swank  
Keyhole  
Score  
Big Ones  
Big Bust  
Fling  
And Many Many Others

**XXX VIDEO**

White Satin Nights  
Jugs of Joy  
Bodies in Motion  
California Blondes  
West and Wild  
Blacks and Blondes

Hot To Trot  
High Rollers  
Six Plus One  
Colosal' Combos #31  
The Duke Of Knockers  
Big Boob Celebration  
Kayla Kleevage Special

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Salley Jesse Raphael  
Howard Stern  
Montel Williams  
Robin Byrd  
48 Hours  
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**Come Join Us For The Fun!**

Happy Hour 7 p.m. - 9 p.m.  
(Where Every Night is a Weekend)

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**This Week  
Only!**

**CENTERFOLD**

**1575 East Brooks Road**

**345-7770**

Show Times: Tues. 8, 10, & 12  
Wed. & Thurs. 5:30, 8:30, 10:30 & 12:30  
Friday 5,7,9,11 & 1 Sat. 8,10, 12, & 2



**Adult Film Star  
Kayla Kleavage**

*Valentines*

**3880 Lamar Ave. at Getwell**

**794-7022**

*Home of the X-Rated Ice  
Cream Show*

**2-4-1 Drinks!**

**Mon - Sat 12-5**

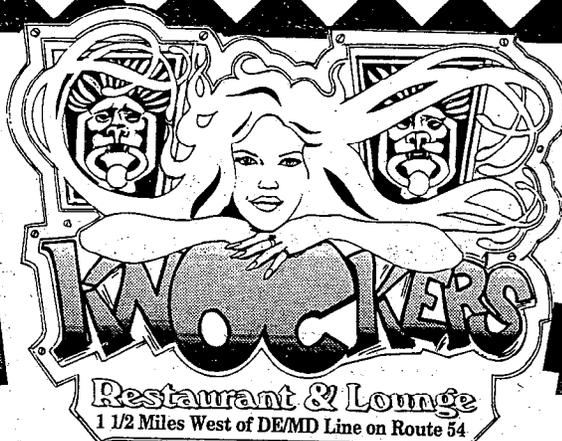


Held Over 1 More Weekend!

**Kayla Kleevage**

4 Shows Nightly  
8:00, 9:30 11:00 p.m. & 12:30 a.m.

Our Young, Pretty Girls  
Serve Drinks & Light Fare  
11 a.m.-1 a.m. 7 Days & 7 Nights



The Home Of The

**HOTTEST  
GIRLS  
On The  
BEACH!**

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Knockers Presents  
The Finest Exotic Dancers  
On The Shore!

**APPEARING  
AUGUST 1**

Coming up...

**Staci Staxxx**

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8:00, 9:30 11:00 p.m. & 12:30 a.m.

The Beach's Best  
**HAPPY HOUR**  
Featuring 95¢ Drafts 11 a.m.-7 p.m.

**NOTICE:** This establishment is intended for mature patrons. If you think you may be offended by our servers' and dancers' attire, Please DO NOT ENTER!

# cheaters

TOPLESS

**THIS WEEK!**  
THRU SATURDAY,  
DEC. 9

Never A  
Cover  
Before  
6PM!

Always  
A Free  
Show at  
5:30!

*Devan  
Michaelis*



X RATED FILM & MAGAZINE  
STAR! "WORLD'S HOTTEST  
BODY" 1995, 1996 SHOWTIMES: 5:30-9:00-11:00

## NEXT WEEK!

MON. DEC. 11 THRU SAT. DEC. 16:  
THE WORLD'S MOST FAMOUS  
PORN STAR!

*Kayla  
Kleevage*



98HHH-23-34  
"JUGS OF JOY!" "BIG BOOBS CELEBRATION!" YOU'VE SEEN HER  
ON HOWARD STERN, 48 HOURS,  
AMERICAN JOURNAL!

# **Crazy Horse**

*Presents*

## **Kayla Kleavage**

*Adult Video Superstar • Adult Magazine Model*

**106 inch Bustline**

**Appearing**

**Monday, Jan. 16**

**thru**

**Saturday, Jan. 21**

**Open 7 Days A Week**

**Happy Hour 7 pm to 9 pm**

**3805 W. Bus. 83**

**Harlingen 425-1988**

**Now Open Sundays**



# cheaters



**KAYLA KLEEVAGE**

72-24-34

MOST FAMOUS X-RATED FILM STAR

**FREE SHOW**

SHOWTIMES 5:30-9:30-11:30

**OPEN 7 DAYS**

**WE TAKE IT ALL OFF!**

**NUDE TABLE  
DANCING**

IN OUR GODIVA LOUNGE

CALL FOR YOUR

**BACHELOR  
PARTY**

BACHELORS WELCOME ON STAGE

**TABLE DANCING  
OUR SPECIALTY**

FREE SECURE PARKING

OPEN 7 DAYS A WEEK

11:30 TO CLOSING

245 ALLEN AVE., PROV.

**941-8310**

# MAGIC LANTERN

THE BEST IN ADULT ENTERTAINMENT

OUR 39TH YEAR

NOW THRU SATURDAY

FIRST AREA APPEARANCE

## KAYLA KLEEVAGE



SHOWTIME -7-9-11

COVERGIRL • CENTERFOLD • 35 MAGAZINES

COMING MAY 18-21

### TOPSY CURVY

MON. THRU SAT. 12 NOON - 1 A.M.

-CLOSED SUNDAYS-

BOSTON RD. RTE. 20  
PALMER, MA  
TEL. 283-9275

# MAGIC LANTERN



COVERGIRL  
☆☆☆☆☆☆  
CENTERFOLD  
☆☆☆☆☆☆  
35  
MAGAZINES

WED.  
thru SAT  
MAY 11-14

SHOWTIME  
7-9-11

## KAYLA KLEEVAGE XXX PORN STAR

### FIRST AREA APPEARANCE

COMING MAY 18 - 21 CRYSTAL STORM  
HRS.: MON-SAT 12:00 PM to 1:00 AM • Closed Sunday  
Boston Rd. • Route 20 • Palmer, MA • (413) 283-9275

**Delilah's**  
**DEN**  
Presents XXX Rated  
Video & Magazine Superstar!  
**Kayla Kleevage**  
92KKK-24-34  
MON. thru SAT. • SEPT. 12-17  
3 Shows Daily at 8-10 & 12



**THE PLAZA at SPRING GARDEN**  
Spring Garden & Front Sts., Phila. • 625-2300 • 1 Block From Delaware Ave.

**HOT  
DANCE**  
**\$6.99**  
EA.

**NEW  
NE  
ARTS**

**OBSESSION Gentleman's Club**  
**250 Longnecks** Saturday & Sunday 6-10PM  
3094 N. Stemmons 634-9300  
I-35 Between Inwood & Mockingbird NO COVER w/this ad



**KAYLA KLEEVAGE**  
Adult Video Superstar  
11/6 thru 11/11 Showtimes 1:15, 5:45, 8:45 & 11:45  
**FREE** burgers, grilled chicken fries, 11AM-1PM Mon.-Sun.  
**\$2.50** 11-8 Daily  
10 oz. Drafts, 8 oz. highballs  
**Pt's**  
**Gentleman's CLUB**  
4875 W. Lawther @ NW Hwy.  
NO COVER 11AM-1 PM **341-6643**

**New York Times says ...**

**... IS GOOD. NAIL-BITINGLY TENSE, TAUTLY DIRECTED.**

...illers - 'Vertigo', 'The Silence of the Lambs', 'Wait Until Dark', at will.

59 GUIDE THE DALLAS MORNING NEWS 11/10/95

<p><i>Clubs</i>  <b>FREE          DRINK!</b>          GET 1 FREE!          READ IMMEDIATELY.          FOR 2 WEEKS!  <b>FREE PARKING</b>          FOR INFORMATION          CALL  <b>78-0000</b></p>	<p><i>Flash Dancers</i> <b>NEW YORK</b>  <b>DOLLS</b>          100 TOPLESS DANCERS!          NEVER A COVER OR ADMISSION CHARGE!  <b>KAYLA          KLEVAGE</b>  <b>88-23-34</b>          SHOWS: 1, 6:30, 9 &amp; MIDNIGHT          Appearing Next Week  <b>KIMBERLY KUPPS</b> DCA#553658  <b>WALL STREET AREA</b>          59 MURRAY ST. BEYOND CHURCH &amp; BROADWAY          NEVER AN ADMISSION CHARGE!          MON-SAT: NOON TO 4AM. SUN 6PM TO 4AM</p>	<p><i>Flash Dancers</i> <b>PRIVATE EYES</b>  <b>SPORTS          CABARET</b>          WHERE SPORTS &amp; PLEASURE COME TOGETHER!          DOORS OPEN          AT 12 NOON!          1ST SHOW 1 PM!          JOIN US FOR          MONDAY NITE          FOOTBALL!          APPEARING THE WEEK          OF OCTOBER 8th  <b>NATASHA          THE GIANT</b>  <b>6'7" AMAZON</b>          SHOWS: MON-FRI:          12:30, 5:30, 1AM          SAT: 10, 12 &amp; 2 AM          DCA#654499  <b>320 W. 45TH STREET!</b>          (BET. 8TH &amp; 9TH AVENUES)          MON-FRI: 12 NOON-4AM. SAT 6PM-4AM</p>
--	---	--

**AMMENT CLUBS IN NEW YORK CITY!**

**VOTED THE #1 ADULT  
ENTERTAINMENT CLUBS  
IN NEW YORK CITY!**

**FRUSTRATED DANCERS' NEW YORK  
DOLLS**

**100 TOPLESS DANCERS!  
NEVER A COVER OR ADMISSION CHARGE**



**KAYLA  
KLEVAGE**

**88-25-34**

**SHOWTIMES**  
11:55-1:30 & MID.  
DCA 553855

**Appearing Next Week  
ANGEL EYES**

**STOCK QUOTES!**  
CONTINUOUS SHOWING OF  
ALL STOCK & COMMODITY  
QUOTES (REAL TIME)

**WALL STREET AREA**  
69 MURRAY ST. BTWN CHURCH & W. BROADWAY.  
NEVER AN ADMISSION CHARGE! (212) 978-0000  
MON-SAT: NOON TO 4AM, SUN 8PM TO 4AM

# CHARLIE'S DREAM

6030 PASSYUNK AVE.  
(In Jerry's Corner Shopping Center)

724-8508

PHILLY'S ONLY COMPLETE ADULT COMPLEX  
VIDEOS! 99¢ to \$36.95

**2 GIRL SHOWS!**

Mon.-Thurs. at 2, 6 & 10 PM

Fri.-Sat. at 2 & 6 PM

Next Week: **MIMI MIYAGI**

**Feature Showtimes:**

Mon.-Thurs. Noon, 4, 8, 12

Mid./Xtra Show Fri. & Sat. 10PM

**69 KKK**

**KAYLA**

**KLEEVAGE**

xxx Film Star





**KAYLA KLEEVAGE**  
Adult Video Superstar  
11/6 thru 11/11 Showtimes 1:15, 5:45, 8:45 & 11:45

**Pt's**  
*Gentleman's*  
**CLUB**

**FREE** burgers, grilled chicken  
fries, 11AM-1PM Mon.-Sun.

**\$2<sup>50</sup>** 11-8 Daily  
10 oz. Drafts, 8 oz. highballs

4875 W. Lawther @ NW Hwy.  
NO COVER 11AM-1 PM **341-6643**

PRESENT AD IMMEDIATELY! GOOD  
AT ALL CLUBS FOR TWO WEEKS!

**BUY 1 DRINK, GET 1  
FREE**

Come To The World Famous  
**FLASH DANCERS**

**100**

**TOPLESS DANCERS**



**KAYLA  
KLEVAGE**  
**88-23-34**

SHOWTIMES:  
1, 6, 9 & MIDNIGHT  
DCA#551764

**BROADWAY**  
BETWEEN 52ND & 53RD STREETS  
MON TO SAT NOON TO 4AM, SUN 8PM TO 4AM  
DISCOUNT PARKING (212) 315-5107

**LIVE! ON STAGE!**  
**Adult Video Star**  
**Kayla Kleevage**

**95HHH-24-36**

Wed., Sept. 10 thru Sat., Sept. 13

Showtimes: 8p.m., 10p.m., Midnight

Advance Tickets: Olde Un Adult Superstore & Eclectics

<b>FREE ADMISSION</b> Mon.-Fri. 4:30-6 p.m.	<b>\$5 ADMISSION</b> After 6 p.m. Mon.-Sat.	<b>\$1 STUDENT COVER</b> EVERY THURSDAY MUST PRESENT VALID STUDENT I.D.
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ABOVE OFFERS NOT VALID SEPT. 10-13



18 OR  
OLDER  
WELCOME

NO  
DRINK  
MINIMUM

**CLUB**  
**VOGUE**

Open Mon.-Fri. 4:30 PM-2 AM, Sat. 6 PM-2 AM & Sun. 6 PM-Midnight

**912 BUS LOOP 70 E**      **442.7491**

WE'RE CONTINUOUSLY HIRING EXCEPTIONAL DANCERS

**New Lighting**  
**New Decor**  
Come See  
The All New  
**CLUB VOGUE**

6207 S. Padre Island Drive

De Padilla Español

**BOTTOM'S UP**



Presenting

**Kayla Kleevage**

85 HHH - 24 - 34

**Wed., Thurs., Fri. & Sat. Only!!**

**3 SHOWS NIGHTLY**

★ Hustler ★ Penthouse ★ Juggs ★ Cheri ★ Fox  
★ Bust-Out ★ High Society

**#1 Topless Club In Corpus Christi**

**18-20 Yr. Olds  
Admitted  
w/picture Driver's  
License**

**5945 Williams at Airline**

**993-2740**

# BEST LIVE SHOWS IN S.F.!

Hustler Busty Beauty  
**Kayla Kleevage**  
at 12:30 - 5:30 - 8:30 & 11:30pm  
**96hh-23-34**



**Market St. Cinema**  
1077 Market St

**Samantha STRONG**  
is  
back!



**THE PORN STAR LEGEND**  
at 12:30 - 5:30 - 8:30 & 11:30pm

**New Century Theater**  
816 Larkin St

**DOUBLE  
IN THE  
BUBBLE**  
At 1:30 - 4:30  
& 8:00pm



**Karessa & Honey Moons**



**Plus Private  
Fantasy  
Booth  
Shows  
with the  
Regal  
Girls!**

**WHERE YOU ARE KING!**

**Regal Show World**  
1046 Market St

# Cheaters

TOPLESS & NUDE

APPEARING

Mon. 6/16 thru Sat. 6/21

## Kayla Kleavage

XXX Film star!

92-24-34!

show times 5:30 9:30 11:30

FREE SHOW 5:30



RHODE ISLAND'S ONLY  
LEGAL ALL NUDE LOUNGE

The

# Lady Godiva

Lounge

## CHEATERS BACHELOR

### PARTIES

ARE UNBEATABLE!  
PUT THE GROOM IN  
THE SHOW! CALL!!

EVERY SUNDAY  
AT 9:30PM

## AMATEUR NIGHT

# \$300<sup>00</sup>

IN CASH PRIZES!  
JUDGED BY THE AUDIENCE!

TABLE & COUCH  
DANCING  
HEADQUARTERS  
OF RI!

DANCERS WANTED: ALL SHIFTS. ASK FOR RICHARD • Call (401) 941-8310

245 ALLENS AVE. ~ PROVIDENCE R.I. 941-8310

OPEN 7 DAYS ~ 11:30AM TILL CLOSE ~ OPEN TILL 2AM FRI. & SAT.! • FREE SECURE PARKING

**THIS  
WEEK:**

**December 23-31**

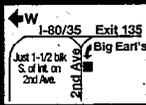
THE KINDEST KAYLA  
Succulently stacked  
Kayla Kleevage gives  
back to her fans at the  
world famous  
Bunnyranch Brothel  
Saturday, December 26-  
Monday, January 4th.  
Call 1-888-Bunnyranch  
for pertinent info; for  
more on Kayla, visit  
Kayla's website, klee-  
vage.com.

# BIG EARL'S



featuring  
**KAYLA KLEEVAGE**

*NON-Alcoholic Beverages  
Available or BYOB*



**4745 NW 2nd AVE.**  
**237-9902**  
Open  
Mon-Fri 3 pm-3 am  
Sun 5 pm-2 am

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**TONIGHT ONLY:**  
**KAYLA KLEEVE**  
**CENSORED**

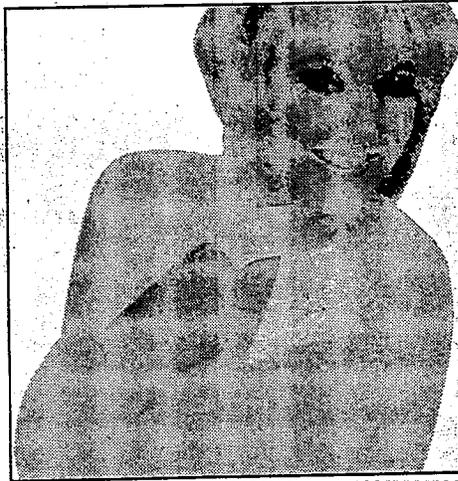
**FINAL SHOW TIMES:**  
SUNDAY  
8:00 10:00 12:00 am

VISA/AMEX/MC  
Proof of Age with ID Required  
Proper Attire  
**FULL BAR**

**5 STAR**  
Businessmen's Luncheon Buffet

**DIAMONDS CABARET**  
1-800-3-DOLLS-3

960 Miamisburg-Centerville Rd.  
I-75 exit 44, 3 miles east of the  
Dayton Mall on St. Rt. 725



APRIL 17TH THRU APRIL 22ND

**KAYLA KLEEVE**

**92 - 24 - 34**

**X X X ADULT FILM  
AND MAGAZINE SUPER STAR**

**SHOWTIMES**

**12:30 - 9:00 - 11:00**

**EXTRA SHOW FRI. AFT. 5:00**

**RICHARDS RENDEZVOUS**

**4410 W. BROAD ST.**

**PHONE 257-7138**

**KAYLA KLEAVAGE**

Appearing  
April 15-20

NOW SHOWING  
BONITA BUST  
APRIL 8-12

SLIPPERY  
WHEN  
WET

**THE  
HILLSIDE**

2724 South 13th Street \* 384-7474

Your Sinoing

**HILLSIDE**  
Milwaukee's Finest Gentleman's Club  
2724 S. 13th Street  
384-7474  
Open Tues. - Sat. 7 p.m. - Close



**KAYLA  
KLEEVAGE**  
COVER GIRL +  
MAGAZINE CENTERFOLD  
APRIL 15-19  
BLOSSOM PEAR APRIL 22-26

Call For Stag  
Party Discounts!

**SHAKERS**  
GENTLEMEN'S CLUB



Featuring **Kayla Kleevage**  
**108 KKK 23 - 24**  
**Adult Film Star**  
**Plus 4 other dancers**

Mon. Jan. 8 - Sat. Jan. 13  
 at 8:00 PM, 10PM and 11:30 shows nightly

**Hours: 6:30PM - 2AM**  
**18 or Older With Valid I.D.**

**100 & Hwy 68**  
**435-4141**

*Delilah's*  
**DEN**  
Presents XXX-Rated  
Video & Magazine Superstar!  
**Kayla Kleevage**  
92KKK-24-34  
MON. thru SAT. • SEPT. 12-17  
3 Shows Daily at 8-10 & 12



**THE PLAZA at SPRING GARDEN**  
Spring Garden & Front Sts., Phila. • 625-2800 • 1 Block From Delaware Ave.

*All Clubs*  
**FREE DRINK!**  
**BUY 1, GET 1 FREE!**  
 PRESENT AD IMMEDIATELY.  
 GOOD FOR 2 WEEKS!  
**DISCOUNT PARKING**  
**FOR INFORMATION ON ANY CLUB, CALL 212-978-0000**

**NEW YORK**  
**100 TOPLESS DANCERS!**  
 NEVER A COVER OR ADMISSION CHARGE!  
**KAYLA KLEVAGE**  
 88-23-34  
 SHOWS: 1, 6:30, 9 & MIDNIGHT  
 Appearing Next Week  
**ANGEL EYES**  
 DCA#553656



**WALL STREET AREA**  
 59 MURRAY ST. BTWN CHURCH & BROADWAY  
 NEVER AN ADMISSION CHARGE!  
 MON-SAT: NOON TO 4AM. SUN 8PM TO 4AM

**PRIVATE EYES**  
**SPORTS CABARET**  
 WHERE SPORTS & PLEASURE COME TOGETHER!  
 DOORS OPEN AT 12 NOON!  
 1ST SHOW 1 PM  
**100 TOPLESS DANCERS**  
**GIANT SCREENS**  
 DCA#554499



APPEARING THE WEEK OF MAY 5th  
**CASEY JAMES**  
 64HHH-24-36  
 SHOWS: MON-FRI: 1, 6:30, 9:30, 1AM  
 SAT: 10, 12 & 2 AM

**320 W. 45TH STREET**  
 (Bet. 8th & 9th Avenues)  
 MON-FRI: 12 NOON-4AM. SAT 8PM-4AM

**ENTERTAINMENT CLUBS IN NEW YORK CITY!**

AILY NEWS • Monday, April 28, 1997

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# KIT KAT

**Huge Centerfold**  
**Kayla Kleeavage**  
Jan. 22-25



Free Lunch Buffet  
HOTLINE 408-733-2628  
18 AND OVER  
907 E. ARQUES AVE.  
**Sunnyvale**

Open Dancer Tryout Contest 1st Prize \$100  
Every Tuesday at 9:00 p.m.

BE

WEDN  
EXOTIC

DON'T MISS  
We

LUNCH SE  
160 Pa  
We cash

Monday in the  
Dayton Daily News  
There's more to the story.

Authority (RTA), 600  
on, Ohio 45402. Please make

**THIS WEEK:**  
**KAYLA KENSORED**

**FEATURE SHOW TIMES:**  
Wed • Thurs • Fri  
12:00 noon 5:30 8:30 11:30  
Saturday  
5:00 8:00 10:00 12:00 am  
Sunday  
8:00 10:00 12:00 am

VISA/AMEX/MC  
Proof of Age with ID Required  
Proper Attire

**FULL BAR**

**5 STAR**  
Businessmen's Luncheon Buffet

**DIAMONDS CABARET**  
1-800-3-DOLLS-3

960 Miamisburg-Centerville Rd.  
I-75 exit 44, 3 miles east of the  
Dayton Mall on St. Rt. 725

**August Indoor Tent Sale**  
**4 Days Only!!!**  
August 23rd to August 26th

4477 Far Hills Ave.  
(at David Rd.)  
Kettering, OH 45429

**13-1444**

**cheaters**



**KAYLA KLEEVAGE**  
98H-23-34  
MOST FAMOUS XXX RATED  
FILM STAR

**FREE DRAWING**  
FOR BOSTON BRUIN AND CELTIC  
TICKETS EVERY THURSDAY.

**GODIVA NUDE LOUNGE**  
**NUDE TABLE DANCING**  
OPEN 7 DAYS 11:30 TO CLOSING

**DEC. 11**  
THRU  
**DEC. 16**

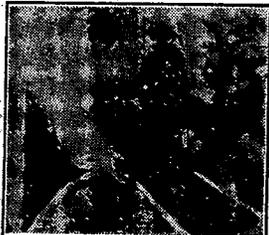
**FREE**  
5:30 SHOW

**SHOWTIMES 5:30 - 9:00 - 11:30**  
*TABLE DANCING OUR SPECIALTY*

**FREE BREAKFAST BUFFET**  
**DEC. 21, 22 & 23**

**FREE SECURE PARKING**  
**245 ALLENS AVE., PROV. 941-8310**

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**\*KAYLA KLEEVAGE\***

**SHOWING AUG. 2 THRU AUG. 5  
AS SEEN IN OVER 20 MAGAZINES  
AND 10 ADULT FILMS IN '94.**

**SHOW TIMES:**

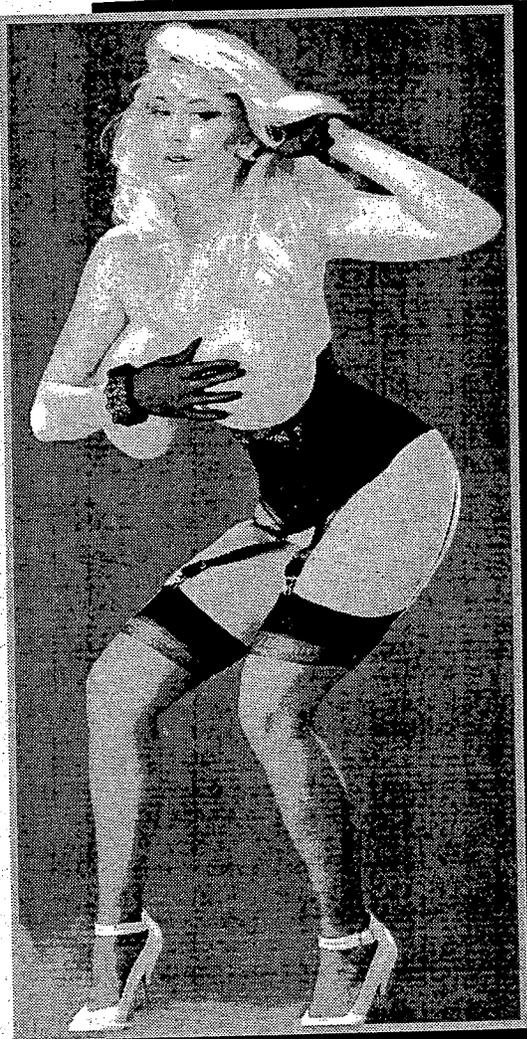
**Wed: 9pm-11pm-1am  
Thurs: 5pm-9pm-11pm-1am  
Fri: 12pm-5pm-9pm-11pm-1am  
Sat: 9pm-11pm-1am**

**Happy Hour 4-7**

**Well Drinks & Longnecks \$1.75**

**24K GOLD CLUB 4102 NACO PERRIN 590-1466**

**Cover \$6.00 No Passes Accepted**



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**KAYLA KLEEVAGE toils way/makes your day brighter at the Bunnyranch Brothel. See THIS WEEK.**

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**GOLDDUST**  
**THIS WEEK ONLY**  
XXX Porn Star  
**Kayla Kleeavage**  
120-24-34



**OPEN MONDAY THRU SATURDAY**  
6 PM TO 3 AM  
116 1/2 Capitol Street  
Downtown Charleston

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WEST V

# ON THE BORDER

Featuring some of the finest cigars in Milwaukee



Don't miss my  
Wed., Thurs, & Fri.  
12:45 Matinee's

## STAG PARTIES...

Free Entry After 6 & Before 9 p.m. Fri. & Sat.

● Only 10 min. north of Racine (Just off I-94)

NOW OPEN SUNDAYS at 6pm

COMING SOON

## Kayla Kleevage

Oct. 26<sup>th</sup> - 31<sup>st</sup>

As seen in Bust Out, Score  
Hustler, Busty Beauties & More

FREE Hat on Mondays!

Limit 1 per customer

FREE Lunch Buffet Daily

Open at 11:30 am  
on going shows all day

10741 S. 27<sup>th</sup> Street

761-6440

# FRANK'S CHICKEN HOUSE I

22 Washington Ave., Manville, NJ

**"NEW JERSEY'S #1 JUICE BAR"**

Watch Your Favorite Sporting Events on our New T.V.  
Tuesday, February 9th through Saturday, February 13th

**CONTINUOUS NUDE DANCING**

Featuring:

**KAYLA KLEEVAGE**

- XXX VIDEO SUPERSTAR
- MEGA XXX MAGAZINE MODEL
- THE BIGGEST BUST IN PORN
- APPEARED ON HOWARD STERN, SALLY JESSE MONTEL SHOW

Feature Showtimes: Tues., Wed., Thurs., Sat.: 5, 9, 11pm; Friday: 12:40, 5, 9, 11pm

Regular Hours: Tues., Wed., Thurs., Sat.: 4pm-1am  
Friday: 12:00 noon - 1am

For Information Call

**908-707-8399**

or CONTACT OUR WEB SITE at  
[WWW.FRANKS-CHICKEN-HOUSE.COM](http://WWW.FRANKS-CHICKEN-HOUSE.COM)

**Talented Dancers Welcome to Audition**

Coming next Week  
**SELENA  
& RAYNE**  
Feb. 16 - Feb. 20

OPENING  
SOON  
ON  
MONDAYS

# FRANK'S CHICKEN HOUSE

THE ONLY CLUB IN NEW JERSEY WITH A TOP FEATURE EACH & EVERY WEEK

Feb 9-13  
**Kayla  
Kleevage**

XXX Star  
Mega Magazine Model  
Appearances on  
The Howard Stern Show  
Sally Jesse  
& Montel



Feb 16-20  
**RAYNE**

Feb 23-27  
**Cynder  
Moon**

The Only  
Erotic Illusionist  
performing today  
never seen before  
on any stage  
YOU CANT MISS  
THIS ONE!



March 2-6  
**Casey James**



1998  
Busty  
Centerfold  
of the Year

New York 15, Sacramen-

## 102, SPARKS 89

Wendy Palmer scored 28 points, 18 of them in the first half, as the Utah Starzz overcame a 17-point first-half

Palmer 7-17 12-18 28-40  
Hardmon 1-4 0-0 2, Reiss 2-9 0-0 5, Williams 0-5 13-15 13, Head 3-6 6-6 13, Boc 2-5 6. Totals 28-68 42-56 102.  
Halftime—Utah 50, Los Angeles 49. 3-Point goals—Los Angeles 5-16 (Leslie 3-7, Dixon 1-3, Mabika 1-3, Toler 0-1, Colleton 0-2) Utah 4-12 (Palmer 2-3, Head 1-1, Reiss 1-5, Baranova 0-2) Hardmon 0-1, Williams 0-1). Fouled out—Toler. Rebounds—Los Angeles 46 (Leslie 10), Utah 51 (Baranova 10) Assists—Los Angeles 19 (Wideman 7), Utah 20 (Baranova 5). Total fouls—Los Angeles 36, Utah 24. A—8,666.

# FRANK'S CHICKEN HOUSE I

22 Washington Ave., Manville, NJ



**KAYLA KLEEVE**  
A VIDEO EXCLUSIVE FEATURE

Tuesday, June 24th through Saturday, June 28th

**CONTINUOUS NUDE DANCING**

Featuring:

**KAYLA KLEEVE**

XXX FILM SUPERSTAR  
OVER 126 XXX VIDEOS  
MEGA MAGAZINE MODEL  
COVERGIRL & CENTERFOLD

Feature Showtimes: Tues., Wed., Thurs., Sat.: 5, 9, 11pm  
Friday: 12:40, 5, 9, 11pm

Coming Tues., July 1 - Sat., July 5:  
**MISTY BLUE**

"NEW" Couch Dancing Available!

More Girls Than Ever

Mon, Tues, Wed, Thurs, Sat 4PM-1:00AM Fri. 12 Noon-1:00AM

For Information Call

**908-707-8399**

No Cover  
Before  
8 pm

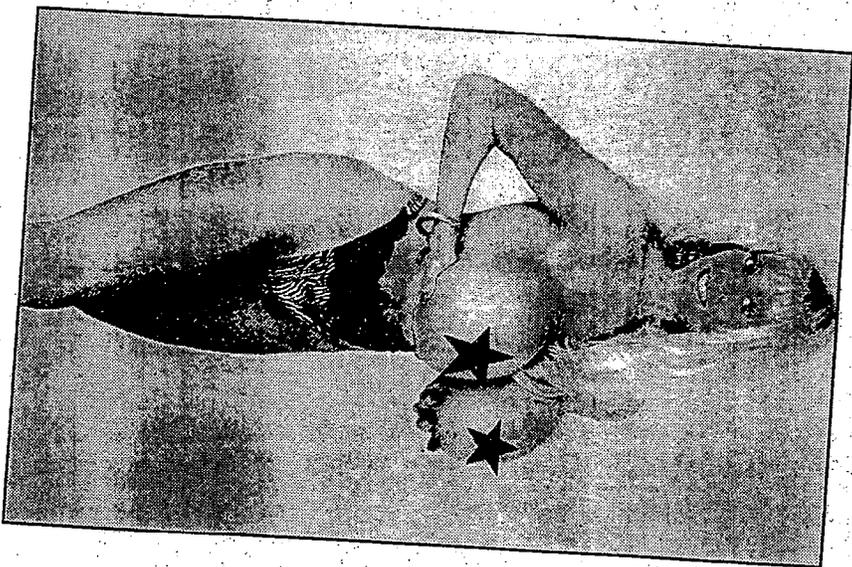
# THE HILLSIDE

2724 South 13th Street • 384-7474  
(1/2 mile north of Oklahoma Ave.)

## Kayla Klevage!

NOW thru Sat., April 15 - 19  
70 XXX Video Star!  
Best European Video '96

Milwaukee's Finest  
Gentlemen's Club!



# BOTTOMS UP

Presents

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**85 HHH Three Shows Nightly**  
Cheri Fox High Society Bust-out  
Hustler Penthouse juggs

Wed.,  
Thurs.,  
Fri.  
&  
Sat.  
Only!

5945 Williams at Airline

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**THE DANCERS RANCH**  
 "We pour **ONLY** Premium Well"

**Will be on FIRE**  
**April 21-26**

**Next Week!**  
 May 1st  
**AMATEUR NIGHT!**  
**\$250<sup>00</sup>**  
**TO THE WINNER!**  
 Contestants Must Arrive by 9pm

**We Reserve The Right To Select Contestants**

**Censored**

*Rayla Pleevage*  
*Featured Entertainer*

*Cedar Rapids*    3000 6th St. SW    366-4748



Come Meet **HUSTLER BUSTY BEAUTY!**

# KAYLA KLEEVAGE

**96HH  
23-34**

July 5 - July 11



ADDED FUN WITH  
BRA-BUSTING  
COVER GIRL...

# LETHA WEAPONS



HELD OVER...

ASIAN  
BEAUTY **Mimi**

PLUS...

## Victoria Secret

OPEN 11:30am - 3:00am!  
COME EARLY - STAY AS LONG  
AS YOU LIKE - SEE IT ALL!

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PLUS OUR FAMOUS SF LIVE -  
SIN CITY & NON STOP SHOWS  
AT THE LARGEST LIVE  
SEX EMPORIUM ANYWHERE!

July 12-18: TEDDI BARRET - CALI CALIFORNIA - FOXY & BRANDI LEE

**CHELSEA  
CHARMS**

**COME & MEET THE  
ALL-TIME BUXOMIST  
SEX-ATIONS!**

**KAYLA  
KLEEVAGE**



IF YOU THINK YOU'VE  
SEEN EVERYTHING  
WATCH THE "MOSTEST"  
OF THE "BESTEST"  
SHAKE-RATTLE  
AND ROLL!

**TWICE AS  
GOOD AS  
THE REST!**



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**DON'T MISS  
EXCITING  
CENTERFOLD  
BEAUTY**

**LIBERTY  
BELL**



Plus Special  
Added Attraction!

**YVETTE &  
VIAGRA**

**IT'S  
WALL  
TO  
WALL  
SEX!**

**MARKET STREET CINEMA**

**1077 MARKET STREET / SF / SHOWTIME INFOLINE: 255-1005**

Coming January 12

KP 237

**Dariel McCoy - Daejha Milan - Savannah**

Appearing at  
**Babes by the Bay**  
**Kayla Kleevage**

Friday (3/29) thru Sunday (4-7)

Hustler Centerfold  
Star of XXX Videos

Bodies in Motion & California Blondes  
Seen on 48 Hours & Sally Jeese Raphael  
Shows at 10 p.m. & Midnight



*Also over 20 gorgeous girls from across the Country*

**Babes by the Bay South Padre Island**

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*Must Be 18 To Enter*

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**Frank's Chicken House I**  
22 Washington Avenue · Marville  
A Gentlemen's Club · 908-707-8399

**Kayla Kleevage**



Appearing:  
Monday, August 2nd,  
through  
Saturday, August 7th  
XXX Video Superstar!  
Mega XXX Magazine Model  
Covergirl & Centerfold  
★ Couch Dancing ★  
Beautiful Girls From Every State  
Talented Dancers  
Welcome To Audition

Coming Aug. 9 - Aug. 14: Heather Hooters

**NOW OPEN MONDAYS!**

Featuring Showtimes: Monday, Tuesday, Wednesday, Thursday  
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# 60-24-34 PORNO STAR

COVER-  
GIRL  
GENT AUG. '91  
D-CUP SEPT. '91  
CHERI NOV. '91  
HUSTLER BUSTY  
BEAUTIES OCT. '91



STAR  
OF XXX  
MOVIES  
BIG BOOB  
GIRLS #8, #9  
THE DUKE  
ON KNOCKERS  
BIG BOOB  
CELEBRATION  
ETC...

**KAYLA KLEEVAGE**

27 AVRIL — 2 MAI  
APRIL 27th — MAY 2nd

**HEUR**



IS PROUD TO PRESENT  
**COVERGIRL AND  
CENTERFOLD**

as seen in:

**GENT  
D-CUP  
CHERI**

**HUSTLER BUSTY BEAUTIES  
THE ROBIN BYRD SHOW**

and XXX Videos

**Big Boob Girls #8**

**Big Boob Girls #9**

**The Duke of Knockers**

**Big Boob Celebration**

**Mamouth Mam Lottery**

Presents  
**Kayla Kleevage**



**SHOWTIMES**

**MARCH 3RD**

thru **15TH**

**TUES-SAT**

9PM • 11PM • 1AM

**SUNDAY**

6PM • 9PM • 11PM • 1AM

**66HH-23-34**

**The Classic Cat  
818 Sheridan St.  
Honolulu, Hawaii  
947-2121**

KP 241

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Showgirl  
Entertainment

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414/761-6440

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**OPEN SUNDAYS**  
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**COUPLES WELCOME!**

• FREE Admission for All Bachelor Parties Before 6 PM (Sat. Nites)!



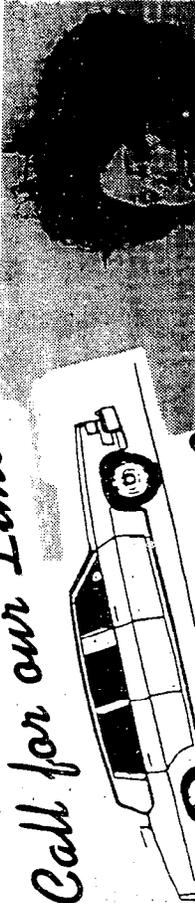
She'll Trip Your Trigger!  
Direct from London

**Kayla Kieevage**

**NOW thru Sat., Oct. 26 - 31**

With Noon (12:45) Matinee Shows on Wed., Thurs. & Fri.

*Call for our Limo!*



# Platinum

# Club

Presents

Kayla Kleavage

99HHH-23-34

January 13 thru 16

4 shows Nightly

Seen in

Hustler

Swank

Cheri

Gallery

Gent

TV

213 Madison, Brooklyn, II

off Route 3

(618) 274-2582



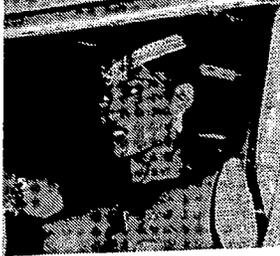
*The SunDown Presents...*

# **A.L.F. AWARENESS PARTY!**

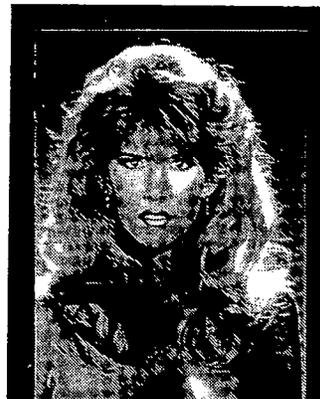
**FRIDAY, DECEMBER 6TH, XTC GENTLEMEN'S CLUB  
8495 GULF FRWY, HOUSTON, TEXAS, 7:30PM**

## **Sierra**

Adult Entertainer  
of the Year '96,  
USA's Most Original Show &  
Best Show '96, Magazine Model



**KAYLA KLEEVAGE**  
Adult Film Star &  
Mega-Magazine Model



**CHRISTI LAKE**  
Adult Film Star &  
Mega-Magazine Model



**KATHY WILLETS**  
Adult Film Star &  
Mega-Magazine Model

## **Vanity**

Adult Entertainer  
of the Year '95,  
Magazine Model



## **Donna Denise**

Entertainer & Magazine Model  
Currently In  
"Black Tail" Dec. '96



**VICTORIA PARIS**  
Adult Film Star &  
Mega-Magazine Model



**SUNSET THOMAS**  
Adult Film Star &  
Mega-Magazine Model



**TERA HEART**  
Adult Film Star &  
Mega-Magazine Model



## **Tasha**

Numerous  
Magazine Layouts  
including Jugs



## **Jordan Jarrell**

Penthouse Video Pet,  
Seen in Cheri, Showgirl,  
Gent & other magazines



## **Miss Marilyn**

National Miss Marilyn  
Winner & Seen in  
numerous magazines.



**SOPHIA STAKS**  
New Adult Film Star &  
Mega-Magazine Model

★ ★ ★ ★ ★  
**Booby Trap** ★

**Presents...**

**Kayla Kleevage**  
**95 HHH**



Centerfold in...  
Playboy &  
Penthouse

**Coming...**

Tues., July 21st  
Wed., July 22nd  
Thurs., July 23rd  
Fri., July 24th  
Sat., July 25th

**FOUR SHOWS**  
**NIGHTLY**  
5:30 PM  
8:00 PM  
10:00 PM  
12:00 MID

**GOLF**  
**Tournament**

**SATURDAY, SEPT 19th**  
CALL 973-6888 FOR  
RESERVATIONS

**BACHELOR PARTY SPECIAL**

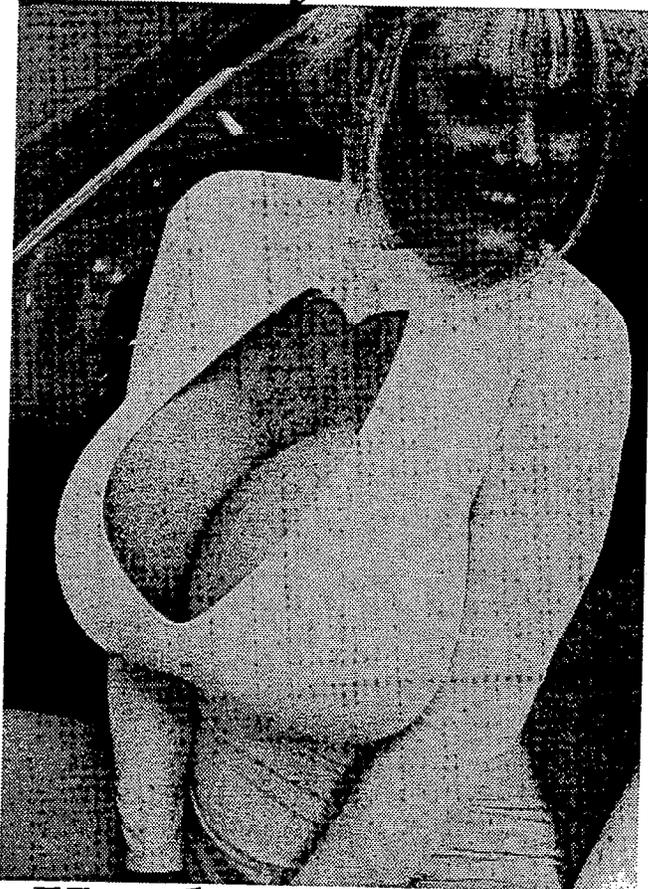
**\$10 per person open bar for one hour & no cover**

**2 for 1 DRINKS TIL 8pm ! NO COVER UNTIL 7pm !**

2840 HAMMONDVILLE ROAD • POMPANO BEACH, FLORIDA

**(305) 971-SEXY**

# *Fantasy Cabaret*



## *Kayla Kleavage*

*Star of Magazine, Video, & T.V. Shows*

*Appearing May 1st thru May 6th*

*Call for Showtimes*

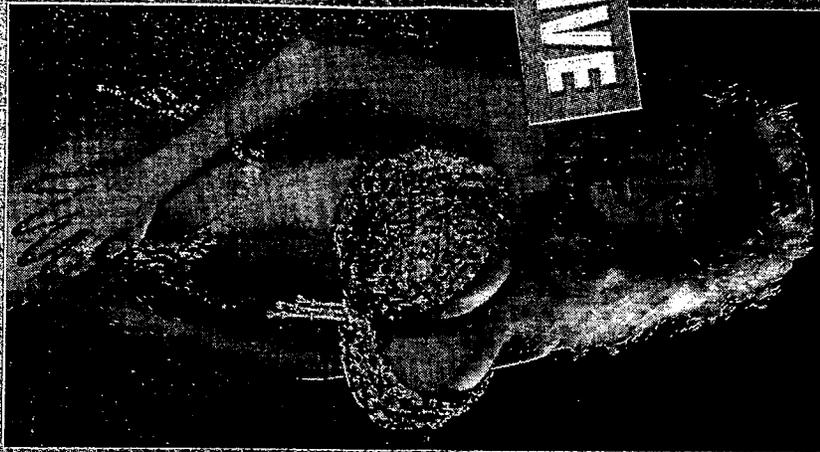
*(713) 943-2688*

*12330 Gulf Freeway*

*• Totally nude • B.Y.O.B. • 18 & up • Come see the Bare Facts •*

1 MARKET ST CINEMA

*Koufa Kleevoage*



LIVE

2 THE NEW CENTURY

*Summer Cummings & Skye Blue*



Summer Cummings & Skye Blue  
 Pleasure Path  
 Hard Core  
 Bondage  
 Show  
 Nov 13 to Nov 19  
 at both locations  
 4250-6530-830-430pm



LIVE

"See the Beauty...  
 Touch the magic!"

SEVEN  
 SINGLES  
 Plus help, guidance  
 & New  
 Attractions

Friday/Saturday  
 New Bangkok  
 Room Shows!

BOUNCE

3 REGAL SHOWWORLD

PRIVATE ROOMS!

LIVE GIRLS!

Stars of:  
 Bustamers, Summers Submissions  
 & 24 GIVE AWAY A Taste of Leather!

**Get Next To Our Stars!**

# Kayla Kleevage



**96**  
**HH**  
**23-**  
**34**

**Nov 12**  
**to**  
**Nov 18**

**LIVE**

You just entered the Home of the  
Big Ones...so Jump right in!



**LIVE**

## Summer Cummings & Skye Blue

**Nov 13**  
**to**  
**Nov 19**

Stars of: Buttslammers, Summers Submissions  
1 & 2, A Skye Trip, A Taste of Leather

**SEX-CITING STAR SHOWS at**  
**12:30 - 5:30 - 8:30 - 11:30pm**

**MARKET ST CINEMA**

**1077 MARKET / 861-2727**

**THE NEW CENTURY**

**816 LARKIN / 776-0212**

**COMING NOV 19**  
**ORIENTAL STAR KIA**

**COMING NOV 20**  
**JAMEZ BLONDE**

PRIVATE PARTY SPACE AVAILABLE  
FOR BACHELOR OR OFFICE PARTIES

# TOP NAME PORN STARS COVER & CENTERFOLD MODELS

NY'S HOTTEST WALL ST. AREA TOPLESS BAR

30 DANCERS DAILY ON  
2 MAGNIFICENT RUNWAYS

LOCATED AT

59 MURRAY ST.

BET. CHURCH & WEST BROADWAY &  
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OPEN EVERYDAY

MONDAY - FRIDAY  
12 NOON - 4AM  
SATURDAY & SUNDAY  
8PM - 4AM

(212) 227-6912



NEW YORK  
**DOLLS**

GRAPHIC DESIGNS BY: DIRT SHAW FLYERS U.S.A. 212-941-6500



**KAYLA KLEEVAGE**

70 - 23 - 34

SEPT. 7 - 12



**LYNDEN JOHNSON**

65 - 22 - 33

SEPT. 14 - 19

KP 249

# BOTTOMS UP

Presents

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Wed.,  
Thurs.,  
Fri.  
&  
Sat.  
Only!

**85 HHH Three Shows Nightly**  
Cheri Fox High Society Bust-out  
Hustler Penthouse juggs

5945 Williams at Airline

KP 250

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The Opening of

**ALWAYS**

**WARDIGAS**  
Restaurant & Bikini Club      Restaurant With All ABC Permits

912 Bragg Blvd. • Fayetteville, NC • 323-3242

Proudly Presents

*Kayla Kleevage*

78KK-22-34

**March 30-April 4th**



KP 251

**TV Appearances**

Sally Jesse Rap...

Robin Byrd (Manha...

World Entertainment...

Hustler Busty Beauties

Society, D-Cup

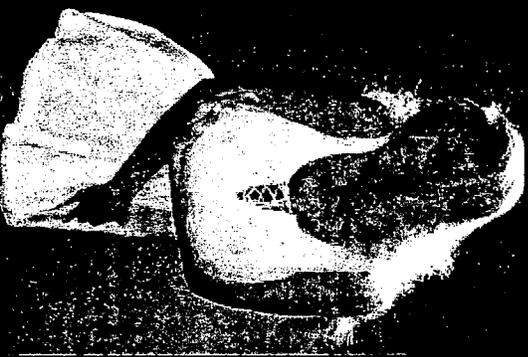
Many More

Exotic-XXX.com



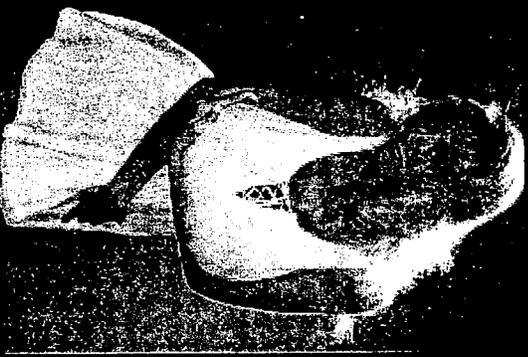
EXOTIC Kayla Kleevage  
5031

Exotic-XXX.com



EXOTIC Kayla Kleevage  
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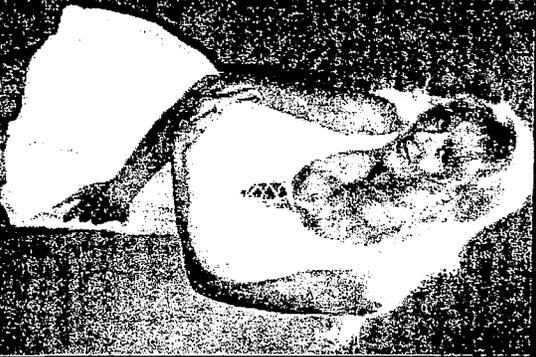
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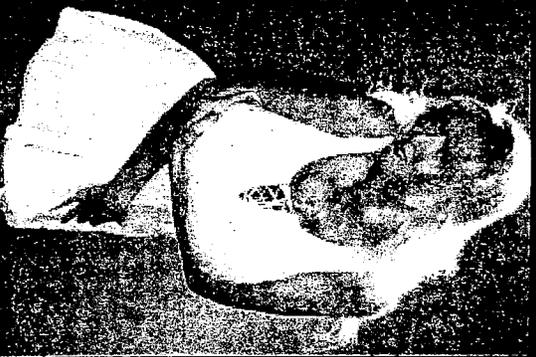
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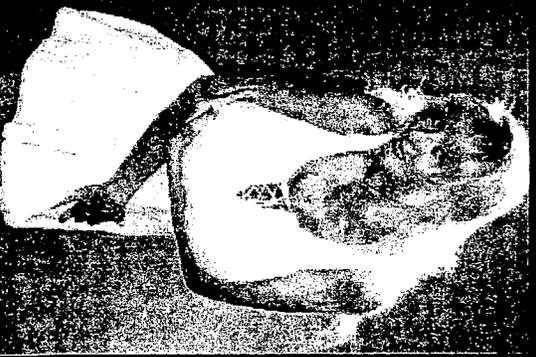
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EXOTIC Kayla Kleevage  
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KP 252

**FAST DANGERS**  
**100 TOPLESS DANGERS**  
 SHOWTIMES: 1, 6 & MIDNIGHT  
**KAYLA**  
**REVENGE**  
 APPEARING NEXT WEEK  
**WHITNEY WONDER**  
**TOP LIQUORS**  
**TABLE DANCING**  
**CONTRADORS ENTERTAINMENT**  
**127 EAST 47TH STREET**  
 BETWEEN 52ND & 53RD STREETS  
 MON TO SAT 12:00 TO 4AM, SUN 8PM TO 4AM

**FAST DANGERS**  
**DANGEROUS DANCES**  
 ALL NITE - ALL THE TIME!  
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 CONTINUOUS  
 ENTERTAINMENT  
 TABLE DANCING  
**127 EAST 47TH STREET**  
 (BETWEEN 52ND & 53RD)  
 (212) 978-0000

**FAST DANGERS**  
**NEW YORK**  
**DOLES**  
**100 TOPLESS DANGERS!**  
 NEVER A COVER OR ADMISSION CHARGE  
**WENDY**  
**WOPPERS**  
 SHOWS: 1, 6:30, 9 & MIDNIGHT  
**82-22-54**  
 APPEARING NEXT WEEK  
**TABITHA TIGRESS**  
**WALL STREET AREA**  
 59 NUNNWAY ST. BLYN CHURCH & BROADWAY  
 MEET AN ADMISSION CHARGE! (212) 978-0000  
 MON-FRI: 12:00-4AM, SAT: 8PM-4AM

**FAST DANGERS**  
**PRIVATE EYES**  
**SPORTS CABARET**  
 WHERE SPORT'S & PLEASURE COME TOGETHER!  
 DOORS OPEN  
 AT 12:00 AM  
 SAT SHOW 12AM  
 GIANT  
 SCREEN TV'S  
 100 TOPLESS  
**DANGERS**  
**JAMES**  
**CASEY**  
 6444-24-36  
 APPEARING WEEK OF  
 DECEMBER 18th  
**TOP LIQUORS**  
**TABLE DANCING**  
**320 W. 45TH ST.**  
 (BET. 8th & 9th Avenues) (212) 978-0000  
 MON-FRI: 12:00-4AM, SAT: 8PM-4AM

Applicant's Responses to Opposer's Request for Documents, Request No. 9

# WHOIS SEARCH RESULTS

## WHOIS RECORD FOR

**kleevage.com**

[Back-order this name](#)

Registrant:  
Kleevco Productions (KLEEVAGE-DOM)  
8635 W. Sahara Ave.  
PMB 563  
Las Vegas, NV 89117  
US

Domain Name: KLEEVAGE.COM

Administrative Contact:  
Kleevco Productions (312429280) [kleevage@EARTHLINK.NET](mailto:kleevage@EARTHLINK.NET)  
8635 W. Sahara Ave.  
PMB 563  
Las Vegas, NV 89117  
US  
(702) 240-2563 fax: 999 999 9999

Technical Contact:  
CWIE LLC (DA17599-OR) [dnsadmin@CWIE.NET](mailto:dnsadmin@CWIE.NET)  
CWIE LLC  
1125 E Glendale Ave  
Phoenix, AZ 85020  
US  
602-248-4963 fax: 602-274-2591

Record expires on 21-Jun-2004.  
Record created on 22-Jun-1996.  
Database last updated on 1-Nov-2003 03:24:49 EST.

Domain servers in listed order:

NS1.CWIE.NET 64.38.192.10  
NS2.CWIE.NET 64.38.192.11

Someone is waiting to grab your Domain.

Don't risk losing it.

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# Kleevco Merchandise Mail Order

Please print this form and follow the mailing information. Make checks payable to (in US Funds):

#482

C

Kleevco Productions

IL

THIS FORM MUST BE FILLED OUT COMPLETELY! Please allow 4-6 weeks for delivery.

Your age: 28

Name: [Redacted]

*Still need nude pic*

Address: P.O. Box 292235

City: Tampa State: FL ZIP: 33687

Country: U.S.A.

Email Address: NA

Telephone Number: NA

*Mile 6.40*

Your Order:

Item #1 Sperm Target Video Price: 19.95

*10/1/96*

Item #2 Panties Price: 11.00

Item #3 8x10 Nude Price: 11.00

Item #4 8x10 Topless Price: 11.00

8x10 clothed Price: 11.00  
Subtotal: 63.95

\$5.00 S&H for one video: 5.00

\$2.00 S&H for each additional video: NA

Total Amount: 68.95

I declare that I am an adult, 18 years of age or older and am lawfully entitled to receive sexually explicit materials in the community where I live and through my mailing address. I understand that I am purchasing/requesting materials which are of a sexual oriented nature. I believe this material to be within community standards of the area in which I live. I authorize Kleevco Productions, to send materials purchased/requested to me at the address listed below. I have not requested the US Postal Service or anyone else to protect me against the receipt of sexually oriented materials or advertisements. I am not an agent or employee of the US Postal service or any government agency ordering/ requesting materials for the purpose of entrapment. I have absolutely no desire to purposely or accidentally receive or request any material of any nature which can be considered illegal or obscene in any form, including but not limited to, brochures, catalogs, photos or videos. I feel that I am an average American citizen or person in the USA with the right to view adult oriented material of any legal type in the privacy of my home. I agree to not duplicate materials for commercial purposes. I certify under penalty of perjury that the information is true and correct to the best of my knowledge and that the use of a fictitious name and signature does not abdicate me from the above.

Signature: [Redacted]



<p><b>BODIES IN MOTION</b></p> 	<p>Infinity Video- If fast cars &amp; fast woman are what you want, you'll enjoy this full length adult video featuring big boobed stars, amateur interview and lots of cum! Starring Kayla Kleevage, Ashley Allen, Daphne, Bianca Trump, Ron Jeremy &amp; Dan Steele. 2 hrs.</p>
<p><b>LACTATION NATION</b></p> 	<p>Leisure Time- Milkmaids with Mammoth mellons! 2 hours.</p>
<p><b>HOT TO TROT</b></p> 	<p>Infinity Video- She's too hot to handle, but not too Hot to trot! A full length adult video featuring an 18" black cock, oral and anal facial cumshots, double dick man, big tits, girl sucking on her own nipples, hot solo and anal action, interracial lust. Starring Kayla Kleevage, Cumisha Amado, Stacy Nichols, Keanna Reyes, Brittney, Zachary Thomas, Moe Biggsley &amp; Johnny Mercury.</p>
<p><b>PARTY ANIMALS</b></p> 	<p>Video Exclusives- Everyone's partying their pants off in this full length adult video that features huge boobs, passionate 3-way action and auto fellatio! Stars Kayla Kleevage, Sean Austin &amp; Cal Jammer! 73 mins.</p>

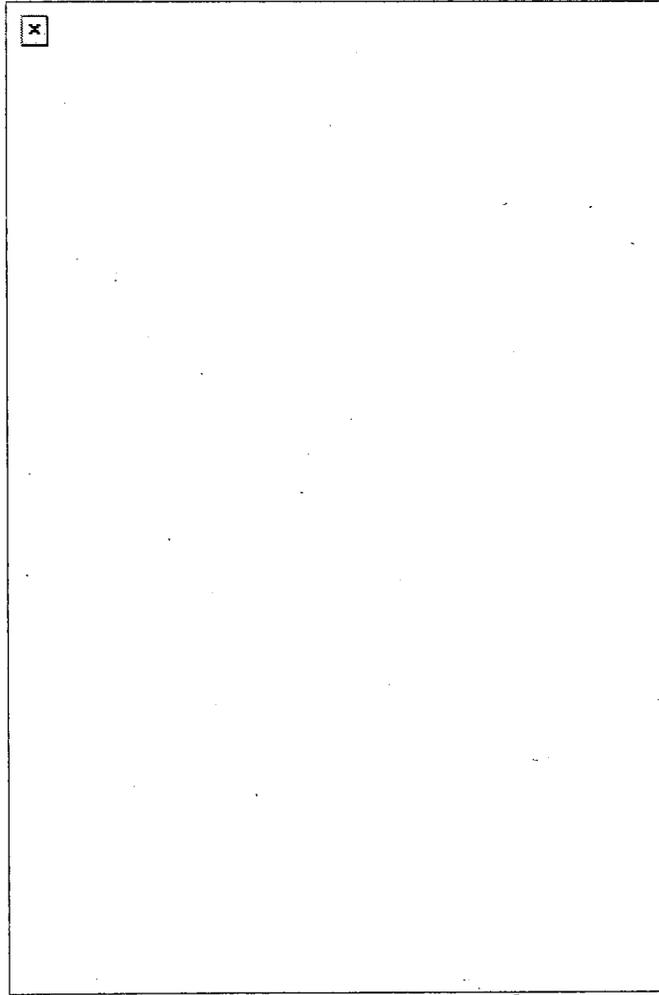


All actresses and actors that appear in any visual depiction of actual sexual conduct with regard to this videotape and on which this statement appears are over the age of 18 years. Some of the depiction's contained in this videotape and some of the graphical materials associated therewith, on which this label appears contain only visual of actual sexual explicit conduct made before July 3, 1995 and as such are exempt from the requirements pursuant to Title 18, U.S.C. 2257 and C.F.R. 75. With regards to the remaining depiction's of actual sexual conduct contained in this videotape and on this box the records required pursuant to Title 18, U.S.C. 2257 and C.F.R. 75 are kept by the Custodian of Records at the office of the manufacturer at the following location: Mr. M. Beckman, Custodian of Records, Leisure Time Entertainment, Inc., 7050 Valjean, Van Nuys, CA 91406.

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# Kayla Photo of the Week

August 3, 1996



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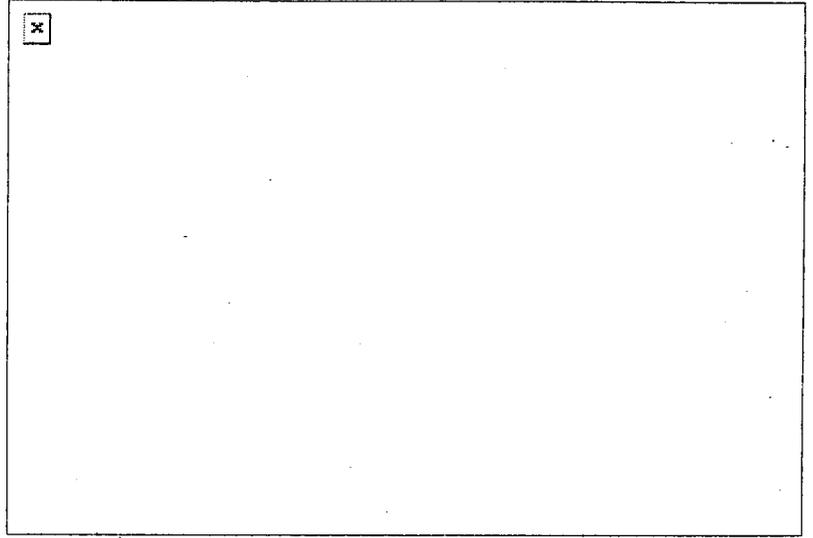
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## *Kayla TV Appearances*

---

### *Past:*

- Sally Jesse Raphael
- Montel Williams
- Howard Stern
- Richard Bey
- Robin Byrd
- American Journal
- Talk Soup
- Marilyn Kagen
- 48 Hours



### *Upcoming:*

*Nothing planned as of this time...*

 [Home](#)

## *Kleevage Keepsakes*



*Follows is a list of my product line:*

<b>Kleevage Fan Club</b>	Consists of T-shirt, 8X10, Polaroid and Quarterly Kleevage Magazine. \$35 for one year..
<b>T-Shirt</b>	\$17.00
<b>Poster</b>	\$12.00
<b>Polaroid</b>	\$11.00
<b>Keychain (Bra On)</b>	\$8.00
<b>Bra</b>	\$35.00
<b>Panties</b>	\$11.00
<b>Personal Video</b> (20 min. please)	\$400.00
<b>Custom-made 8X10</b>	\$40.00
<b>One of a kind photo album</b> (36 exp on 35mm slides)	\$100.00
<b>Stockings</b>	\$10.00
<b>8X10</b>	\$11.00
<b>Autographed magazine</b>	\$15.00
<b>Bio-cassette</b> (I tell the truth and nothing but the truth about my life story and fantasies)	\$15.00
<b>The Kayla Kleevage Striptease</b> (nude right in your living room)	\$35.00



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[Order](#)

### Kleevco Merchandise Mail Order

Please print this form and follow the mailing information. Make checks payable to (in US Funds):

**Kleevco Productions**  
757 Emory Street  
Box 107  
Imperial Beach, CA 91932

THIS FORM MUST BE FILLED OUT COMPLETELY! Please allow 4-6 weeks for delivery.

Your age: \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ ZIP: \_\_\_\_\_

Country: \_\_\_\_\_

Email Address: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

#### Your Order:

Item #1 \_\_\_\_\_ Price: \_\_\_\_\_

Item #2 \_\_\_\_\_ Price: \_\_\_\_\_

Item #3 \_\_\_\_\_ Price: \_\_\_\_\_

Item #4 \_\_\_\_\_ Price: \_\_\_\_\_

Subtotal: \_\_\_\_\_

\$5.00 S&H for one video: \_\_\_\_\_

\$2.00 S&H for each additional video: \_\_\_\_\_

Total Amount: \_\_\_\_\_

I declare that I am an adult, 18 years of age or older and am lawfully entitled to receive sexually explicit materials in the community where I live and through my mailing address. I understand that I am purchasing/requesting materials which are of a sexual oriented nature. I believe this material to be within community standards of the area in which I live. I authorize Kleevco Productions, to send materials purchased/requested to me at the address listed below. I have not requested the US Postal Service or anyone else to protect me against the receipt of sexually oriented materials or advertisements. I am not an agent or employee of the US Postal service or any government agency ordering/ requesting materials for the purpose of entrapment. I have absolutely no desire to purposely or accidentally receive or request any material of any nature which can be considered illegal or obscene in any form, including but not limited to, brochures, catalogs, photos or videos. I feel that I am an average American citizen or person in the USA with the right to view adult oriented material of any legal type in the privacy of my home. I agree to not duplicate materials for commercial purposes. I certify under penalty of perjury that the information is true and correct to the best of my knowledge and that the use of a fictitious name and signature does not abdicate me from the above.

Signature: \_\_\_\_\_



x

x

## YOU WILL GET:

- 4 issues of KLEEVAGE!
- a KLEEVAGE magazine and T-shirt
- A polaroid of Kayla in the position of your choice!

All for a mere \$35.00 U.S. Dollars!!  
Outside the U.S. \$50.00!!

"Wow! Kayla's stripper-zine "Kleevage" is the best designed fan club publication I have ever seen. It's eye-popping"

Elliot James

Boob Beat columnist

Score Magazine

## From the Editors Desk Spring 96

Guess what? I have survived another issue and what a great boobfest issue it is!

First up-the bodacious Misty Mountains from the LoneStar State where everything is bigger stars as a centerfold in this issue!

Then we jump all the way to California for a personal in-depth interview with porn icon Ron Jeremy! I love Ron, he gave Kleevage a great interview!! I think you'll enjoy it. There's some great behind the scenes pictures from T.V. Talk show you've probably already seen. Guests include Sareena Lee, Tiffany Towers, Letha Weapons and yours truly (Ms. K).

Don't forget to check out my two new videos- Sperm Target and The Perverted Director. It was nice having total control over production. Check them out. I guarantee you'll get a rise out of these two!

Sneak previews of my upcoming layouts, gorgeous local dancers turned pro and all the other goodies you have come to expect from Kleevage!

Kleevage would like to take this space to publicly thank Elliot James for the sparkling review he gave Kleevage in his column Boob Beat which is published monthly in Score magazine. Thanks a lot Elliot!

So get both hands ready! Here we go!

With all my Kleevage Love,

*Kayla*

---

*Photos from this issue...*

[[Kayla in Key Biscayne](#)] [[Page 1](#)] [[Back Cover](#)]



Home



Order

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**Kleevco Productions**

**Commision**

07-01-96 \$300.00 Deosit to account  
07-11-96 (\$150.00) Domain registration Kleevage.com  
07-11-96 (\$54.00) Mailbox setup  
07-19-96 (\$60.00) Hosting Fee MNS July 96  
07-19-96 (\$71.15) Kodak Slide Conversion  
07-19-96 (\$57.50) Slide Conversion-Ray Mynster  
07-19-96 (\$100.00) Hosting for August 96  
08-11-96 \$192.65 Payment  
08-20-96 (\$100.00) Hosting for September 96  
09-12-96 \$100.00 Payment  
09-21-96 (\$200.00) Hosting for October 96

July/Aug ?????? Past Due  
Sept

Balance (\$200.00)

Balance \$0.00

THE FINEST GENTLEMEN'S CLUB

giorgio's  
of S.A.



MARCH 25 THRU MARCH 30

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**60-22-34**

Showtimes 1-8-10-12

**647-5667**

Loop 410 & Callaghan

GIORGIO'S CLUB ~~Q~~

6109 CALLAGHAN

SAN ANTONIO TEXAS

(512)-647-5667

3-25-91- 3-30-91

CONTRACT FOR ~~\_\_\_\_\_~~

PLUS 250 TRAVEL ————— 250.00

(CHECK)

Comm. 10% P.D. BY AZTEC TO UNIVERSAL ~~\_\_\_\_\_~~

TRAVEL 250.00

168 ~~288~~ POLOROIDS 1680.00

STAGE TIPS 869.00 869.00

19-8 KIDS + 95.00

NET. ~~\_\_\_\_\_~~

AIRFARE to FLA  
3/30/91 - \$808.00

then 3/30/91 ———— ~~\_\_\_\_\_~~

# City's AND Clubs, Photo shoots

1	2/26	Houston, Texas	
2	3/17-90	TORONTO, CANADA	
3	3/18-90	NEW HAVEN CONN.	(RALPH)
4	3-23-90	Kingston, New York	
5	3-26-90	OTTAWA, ONTARIO	
6	1-6-91	EL PASO, TEXAS	→ Montreal, Quebec
7	1-14-91	L.A. California	(Photo shoot)
8	1-15-91	Palm Springs CAL	(Photo shoot)
9	1-21-91	INDIANAPOLIS, INDIANA	
10	2-4-91	L.A. California	Palm Springs (Photo shoot)
11	3-9-91	Houston, Texas	
12	2-27-91	TAMPA FLA	
13	3-3-91	VANCOUVER, B.C.	
14	3-10-91	TAMPA, FLA	
15	3-11-91	Boston, MASS (Costumes)	
16	3-12-91	NEW HAVEN CONN.	
17	3-18-91	TORONTO CANADA	
18	3-30-91	SAN ANTONIO, TEXAS (RALPH)	
19	4/6/91	Ft. MYERS, FLORIDA	
20	4/7/91	LONDON, ENGLAND (Photo Shoots)	
21	4/14/91	N.Y. N.Y.	
22	4/15/91	Minneapolis Minnesota	
23	4/21/91	Houston, Texas (off week)	
24	4/28/91	TACOMA, WASHINGTON	
25	5/6/91	SEATTLE, WASHINGTON (EVERETT)	
26	5/13/91	INDIANAPOLIS, INDIANA (BABE'S EAST)	

# City's, Clubs AND Photo Shoots

5/20-91	9-25-91	INDY, INDIANA	Babe's West, Indy 500"
5/28-6/1/91	6/1/91	Philadelphia PENN	(Les Gieles)
6/3-6/8/91	6/8/91	Montreal Quebec	(CASTEL FINA)
6/9-6/15/91	6/15/91	Houston, TEXAS	(OFF WEEK)
6/17-6/23/91	6/23/91	New York City (N.Y. Dolls)	
6/23-6/29/91	6/29/91	Hamilton ONTARIO	CANADA
6/30-7/15/91	7/15/91	Palm Springs California	(Photoboot)
7/16/91-7/20/91	7/20/91	Summer Set NJ	(FRANKS CHECKED)
7/22-7/27/91	7/27/91	SAN FRANCISCO CA	(MARKET STREET)
7/28-8/7/91	8/7/91	Houston, TEXAS	OFF
8/7/91-8/11/91	8/11/91	Kingston, New York	OFF
8/12/91-8/17/91	8/17/91	Windsor ONT. CAN	Studio Four
8/20-91-8/24/91	8/24/91	Booby Trap	permpo Beach FLA.
8/26-8/31/91	8/31/91	HOTS Club	Corpus CRISTY TX
9/3-9/8/91	9/8/91	Private Eyes	two Phila
9/9-9/15/91	9/15/91	INDY, INDIANA	BABE'S WEST
9/16-9/21/91	9/21/91	VANCOUVER, BC	Metrotown Pub
9/23-9/28/91	9/28/91	Houston, TEXAS	GIG'S CABARET
9/30/91-10/5/91	10/5/91	New York City	(FLASH DANCERS)
10/7-10/12	10/12	NETWORK ONTARIO	CANADA
10/14-10/19	10/19	House of LANCASTER II	TORONTO
10/21-10/26	10/26	House of LANCASTER I	TORONTO
10/28-11/2/91	11/2/91	Spotlight Room,	CALGARY ALTA CAN.
11/4-11/9/91	11/9/91	TASSELS,	CORPUS CRISTY TX.
11/11-11/16/91	11/16/91	CARDINAL LOUNGE,	ROCHESTER, NY
11/18-11/23/91	11/23/91	CANDY STORE,	MOBILE ALA.
12/9-12/14/91	12/14/91	ROSES CANTINA,	GRATON CON. (HOME FINNLY)

# Gen

AUGUST 1991

\$4.95

02317

## of the D-Cups

A  
**KAYLA**

**DEBUT**

*Dressing Down Covergirl*

*Kayla Kleeavage*

*(page 43)*

*How To Bet Baseball:  
Getting A Line On  
The Boys of Summer*

*Rusty Rhodes:  
A Busty Redhead  
With A Talent  
For Assuming  
The Position*

*Three Pages  
of Readers'  
Girlfriends  
and Wives*

*Reviews of  
the Best  
New Videos*

*Hot Outtakes  
From XXX-rated  
"Mammary Manor"*

*Talk About Hair Pie! (page 20)*

*A New Rubenesque Cutie (page 31)*

*The New Nympho: More Than A Myth*

*Donna Ambrose's Celebrated Return*

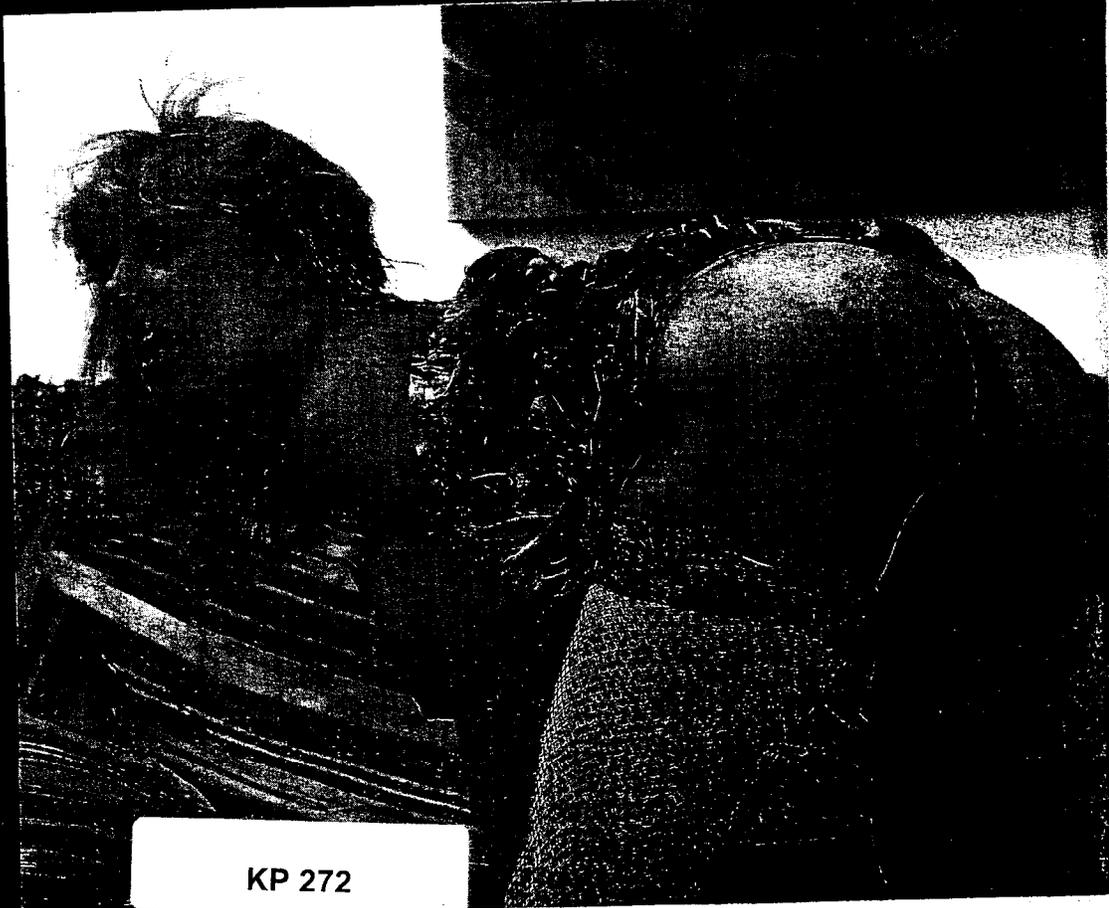


KP 271

older.



**T**alk about making your presence felt quickly! In her first appearance in GENT, Kayla Kleevage, a 24-year-old exotic dancer from Houston, is not only our centerfold, but our covergirl as well. Sure, some models have debuted as both in the past, but regular GENT readers know how truly rare a feat it is. But if anyone's up to the task, it's Kayla. At 5'7½" and 115 pounds, Kayla's toned, dancer's body is flawless, and her hefty 55-inch tits (she measures 55-23-34) make her the epitome of the slim-'n'-stacked model.



Applicant's Responses to Opposer's Request for Documents, Request No. 10

City's AND Clubs, Photo shoots

1	2/15	Houston, Texas	
2	2/17-90	Toronto, Canada	(RALPH)
3	2/18-90	Toronto, Canada	
4	2-23-90	Kingston, New York	
5	2-26-90	OTTAWA, ONTARIO	
6	1-6-91	EL PASO, TEXAS	→ MONTREAL, QUEBEC
7	1-14-91	L.A. California	(Photo shoot)
8	1-15-91	Palm Springs CAL	(Photo shoot)
9	1-21-91	Indianapolis, INDIANA	
10	2-4-91	LA. California	Palm Springs (Photo shoot)
11	2-9-91	Houston, Texas	
12	2-27-91	TAMPA FLA	
13	3-3-91	VANCOUVER, B.C.	
14	3-10-91	TAMPA, FLA	
15	3-11-91	Boston, MASS (Costumes)	
16	3-12-91	New Haven Conn.	
17	3-18-91	TORONTO CANADA	
18	3-30-91	SAN ANTONIO, TEXAS (RALPH)	
19	4/6/91	Ft. Myers, FLORIDA	
20	4/7/91	LONDON, ENGLAND (Photo Shoots)	
21	4/14/91	N.Y. N.Y.	
22	4/15/91	Minneapolis Minnesota	
23	4/21/91	Houston, Texas (off week)	
24	4/28/91	TACOMA, WASHINGTON	
25	5/6/91	SEATTLE, WASHINGTON (EVERETT)	
26	5/13/91	Indianapolis, INDIANA, (BABES EAST)	

City's, Clubs AND Photo Shoots

5/20/-91	INDY, INDIANA Babes West, Indy 500"
5/28/-6/1/91	Philadelphia PENN (Les Girls)
6/8/-6/8/91	Montreal Quebec (CASTLE TUNA)
6/9/6/15/91	Houston TEXAS (OFF WEEK)
6/17-6/23/91	New York City (N.Y. Dolls)
6/23-6/29/91	HAMILTON ONTARIO CANADA
6/30-7/15/91	Palm Springs California (Photoshoot)
7/16/91-7/20/91	Summer Set NJ (FRANKS CHICKEN)
7/23/-7/27/91	SAN FRANCISCO CA (MARKET STREET)
7/28/-8/7/91	Houston, TEXAS off
8/7/91-8/11/91	Kingston, New York off
8/12/91-8/17/91	WINDSOR ONT. CAN Studio FOUR
8/20-91-8/24/91	Booby TRAP pompano BEACH FLA.
8/26/-8/31/91	HOTS CLUB Corpus CRISTY TX
9/1-8/7/91	Private EYES too Phil.
9/9/-9/15/91	INDY, INDIANA Babes West
9/16/-9/21/91	VANCOUVER, BC. Metrotown Pub
9/23/-9/28/91	Houston TEXAS GIG'S CABARET
9/30/91-10/5/91	New York City (FLASHDANCERS)
10/7-10/12	NETWORK ONTARIO CANADA
10/14-10/19	House of LANCASTER II TORONTO
10/21-10/26	House of LANCASTER I TORONTO
10/28-11/2/91	Spotlight Room, CALGARY ALTA, CAN.
11/4-11/9/91	TASSEL'S, Corpus CRISTY TX.
11/11-11/16/91	Cordial Lounge, Rochester NY.
11/18-11/23/91	CANDY STORE, MOBILE ALA.
12/1-12/14/91	ROSES CANTINA, GEORGE CAN. (HOME FINALLY)

1 FEB. 2 1992 LEAVE Houston/Hobby  
 2 FEB 3-9 DANNY'S MEMPHIS TENN.  
 3 FEB 10-15 CHRISTENES PEW SACKLA FLA.  
 4 FEB 17-22 NEXT GENERATION, SCHENECTADY NY.  
 5 FEB 24<sup>TH</sup> SALLEY JESSE SHOW N.Y.N.Y.  
 6 FEB 25-30 Goldfingers, QUEENS NY.  
 7 MARCH 1-15 CLASSIC CAT HONOLULU HAWAII  
 8 MARCH 15-22 MAUI, VACATION w/ Bubba  
 9 MARCH 23-28 CRAZY HORSE, CLEVELAND, OHIO  
 10 MARCH 30 - APRIL Always MARI GERS, FAYETTEVILLE NC.  
 11 APRIL 6-11 CAIGUAXXI, DALLAS TX  
 12 APRIL 13-18 Giorgio's SAN ANTONIO TX.  
 13 APRIL 20 Poster Shoot Houston TX.  
 14 APRIL 24 Taped SALLEY JESSE SHOW NYC.  
 15 APRIL 27-30 CABARET SHOW GIRLS MONTREAL CAN.  
 CRAZY HORSE SALOON ANCHORAGE ALASKA.  
 MAY 1-9<sup>TH</sup> Audition for T.V. SPECIAL NYC.  
 MAY 16<sup>TH</sup> Photo shoot WARREN TANG NYC  
 MAY 17<sup>TH</sup> FLASH DANCERS, BROADWAY NYC  
 MAY 18-23 STAGE DOOR JOHNNY'S NEW HAVEN CONN.  
 MAY 27-30 MAY 31 - JUNE 7<sup>TH</sup> HOUSTON TEXAS (OFF)  
 JUNE 8<sup>TH</sup> - 13<sup>TH</sup> FINE EYES ST CATHERINE ONT. CANADA  
 JUNE 22-27 FUZZY GRAPE WEBSTER MASS  
 6/28-7/1/92 DANNY'S MEMPHIS TENN  
 7/6-7/11/92 LAKE LAND LOUGE JACKSON MISS  
 7/13-7/18 BOBKY'S MIAMI FLA

17/21-7/25 Pompano Beach FLA BOOBY TRAP  
 2 OFF AUGUST 1992  
 8/31-9/5/92 GIGIS HOUSTON  
 9/8-9/13 NEW YORK DOLLS  
 9/16-9/22 MARKET STREET SAN FRAN  
 9/28-10/3 VANCOUVER BC METRO HOTEL  
 10/5-10/10 Charlotte SC. CARPES CLUB  
 10/12/10/13 FLORENSE SC. ~~CLUB~~  
 9 CLUB SHUT DOWN BY JUDGE.  
 10/14-10/25 HOUSTON HOME (PHOTO SHOOT)  
 10/26-10/31 TEX-MEX CLUB MALLEN (GRAPE)  
 11/1-11/7 AKRON OHIO FLASH DANCE (DOOR)  
 11/2-11/14 FAYETTEVILLE NC. THE CELLAR  
 11/16-11/21 TUCSON AZ. TEMPTATIONS  
 11/22-11/23 OFF 1 DAY HOUSTON, HOME  
 11/23-11/29 RACINE WISC. THANKSGIVING.  
 11/30-12/5 WINNIPEG MANITOBA TEASEERS  
 12/7-12/12 Des Moines Iowa BIG EARLS  
 12/14-12/19 WICHITA FALLS TX FANTASY  
 12/31-12/31 FLASH DANCERS BUWAY NYC.  
 END '92  
 21  
 22  
 23  
 24  
 25  
 26

1993 Clubs + Cities

1	START	LEAVE Houston
2	1-13-93	St. Louis / PLATINUM
3	1-19 → 1-23	BANDRAIDS PHOENIX AZ.
4	1-24 → 1-26	Photo Shoot, SEDONA AZ.
5	1-28 → 1-30	Rose's CANTINA GROTON CONN. (BAPT)
6	2-1 → 2-6	CRAZY HORSE MYRTLE BEACH SC.
7	2-7 → 2-21	Houston off 2 weeks (FLU)
8	2-22 → 2-27	Obsessions Cabaret Wichita, KS.
9	3-1 → 3-6	In Between lounge, Wilksbarre PA.
10	3-8 → 3-13	FLASH DANCERS AKRON OHIO
11	3-15 → 3-20	Valentines Memphis TN.
12	3-22 → 3-27	N.Y. Dolls, NYC.
13	3-28 → 4-18	Houston, TX off 3 weeks
14	4-19 → 4-24	Fantasy Club Pitts. Pa.
15	4-26 → 5-1	BARBARILLA'S DIAMONDS OTTAWA ONT. CANA.
16	5-3 → 5-8	Boobie Bungalow, Elkton, T.N.
17	5-9 → 5-16	Houston TX off
18	5-19 → 5-22	BARE ASSETS Melbourne FLA.
19	5-24 → 5-29	Foxy Lady Providence R.I.
20	5-31 → 6-15-93	Los Angeles CA Lots of fun
21	6-15 → 6-20	Houston Texas (Home off)
22	6-21 → 6-26	FLASH DANCERS N.Y.C.
23	6-28-93	KINGSTON N.Y. (off 1 day)
24	6-29 → 7-3	Rose's CAFE GROTON CONN. (D)
25	7-4 → 7-10	Houston Texas / Poster Shoot
26	7-11 → 7-17	CEADAE RAPIDS DANCERS BATH ICOLA
27	7-19 → 7-24	DENVER CO. DREAM HOUSE

111 John's 800 #  
Home, Houston VACATION

1-22-93-424-9273

pin # 1028

Augsta GA, T.J. Smiles

New York Dolls NYC.

Columbus GA TRAFFIC Light +

MIAMI FLA. PALACE CATERING

ANCHORAGE ALASKA CRAZY HESSE

7-25 → 9-5

9-6 → 9-11

10-27 → 10-30

11-1 → 11-6

1 FLASH DANCERS N.Y.C.

2 CLUB MARY SARASOTA FLA.

3 CLASSIC CAT NASHVILLE TN.

4 THE RANCH NACADOCCHES TX.

5 THE RIVIERA HOUSTON TX.

6 PARTY PLACE CABARET CC. TX

7 PRIVATE EYES N.Y.C.

8 TUXEDO'S WATERLOO IOWA

9 FILLIE CORAL BELLE VERBON PA.

10 FLASH DANCERS N.Y.C.

11 CHARLIE'S DREAM Phila. PA.

12 MAGIC LANTERN AMER MASS.

13 J.B.'S NORFOLK VA.

14 CHEATERS PROV RI.

15 KNOCKERS OCEAN CITY MD. (2 wks)

16 N.Y. Dolls N.Y.C.

17 P.T.'S DALLAS & TEXAS

18 JERRY'S CABARET MOBILE ALA.

19 CRAZY HORSE MEN'S CLUB CLEVE.

20 DELILAH'S DEN Phila. PEN

21 BIG CARLS DES MOINES IOWA

22 ALEX'S CLUB BOSTON MASS.

23 FLASH DANCERS N.Y.C.

24 P.T.'S DALLAS TX.

25 CHRISTMAS HOLIDAYS

26 JAN 16 95 END 94

DEC 27

JAN 16 95

# CLUB Dates '95

- 1-16-21 CRAZY HORSE HARLING IN. TX.
- 1-23-28 TEXAS CABARET MISSION TX.
- 1-28-24 CAMICHIN III BROWNVILLE TX
- 2-17-24 New York Dolls N.Y.C.
- 4-17-22 Richards PENEZUBOUS ~~Richmond VA.~~ (PAWA)
- 5-1-56 FANTASY'S, Houston TX
- 5-28-62 FLASH DANCERS N.Y.C.
- 6-3-69 CHEETERS Prov. RI (PAWA)
- 8-27-85 GOLD CLUB SAN. ANT. TX
- NY Dolls NYC
- Body Shop GROTON CONN
- 10-17-1001 COUNTERFOLDS, Memphis TN







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**84 Results**

\* denotes when site was updated.

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1 pages	5 pages	7 pages	16 pages	19 pages	10 pages	13 pages	13 pages
<a href="#">Dec 21, 1996</a> *	<a href="#">Jan 10, 1997</a> *	<a href="#">Jan 16, 1998</a> *	<a href="#">Jan 25, 1999</a>	<a href="#">Feb 29, 2000</a>	<a href="#">Jan 19, 2001</a>	<a href="#">Feb 03, 2002</a> *	<a href="#">Feb 02, 2003</a>
	<a href="#">Jan 10, 1997</a> *	<a href="#">Feb 01, 1998</a>	<a href="#">Jan 25, 1999</a>	<a href="#">Feb 29, 2000</a>	<a href="#">Jan 19, 2001</a>	<a href="#">May 23, 2002</a>	<a href="#">Feb 07, 2003</a>
	<a href="#">Apr 12, 1997</a> *	<a href="#">Apr 18, 1998</a>	<a href="#">Feb 08, 1999</a>	<a href="#">Mar 03, 2000</a>	<a href="#">Feb 08, 2001</a>	<a href="#">May 26, 2002</a>	<a href="#">Feb 14, 2003</a>
	<a href="#">Jun 18, 1997</a> *	<a href="#">Dec 02, 1998</a>	<a href="#">Feb 08, 1999</a>	<a href="#">Apr 08, 2000</a>	<a href="#">Mar 09, 2001</a>	<a href="#">Jun 02, 2002</a>	<a href="#">Feb 19, 2003</a>
	<a href="#">Jun 25, 1997</a>	<a href="#">Dec 06, 1998</a>	<a href="#">Feb 09, 1999</a>	<a href="#">May 10, 2000</a>	<a href="#">Apr 01, 2001</a> *	<a href="#">Aug 02, 2002</a>	<a href="#">Mar 21, 2003</a>
		<a href="#">Dec 12, 1998</a>	<a href="#">Feb 18, 1999</a>	<a href="#">May 10, 2000</a>	<a href="#">May 08, 2001</a>	<a href="#">Sep 22, 2002</a>	<a href="#">Mar 31, 2003</a>
		<a href="#">Dec 12, 1998</a>	<a href="#">Feb 20, 1999</a>	<a href="#">May 11, 2000</a>	<a href="#">May 19, 2001</a> *	<a href="#">Sep 27, 2002</a>	<a href="#">Apr 11, 2003</a> *
			<a href="#">Mar 02, 1999</a>	<a href="#">May 11, 2000</a>	<a href="#">Jun 29, 2001</a>	<a href="#">Sep 29, 2002</a>	<a href="#">May 28, 2003</a> *
			<a href="#">Apr 21, 1999</a>	<a href="#">May 19, 2000</a>	<a href="#">Jul 08, 2001</a>	<a href="#">Nov 20, 2002</a>	<a href="#">Jun 02, 2003</a>
			<a href="#">Apr 27, 1999</a>	<a href="#">May 19, 2000</a>	<a href="#">Jul 21, 2001</a>	<a href="#">Nov 27, 2002</a>	<a href="#">Jun 09, 2003</a>
			<a href="#">Apr 27, 1999</a>	<a href="#">Sep 16, 2000</a> *		<a href="#">Nov 28, 2002</a>	<a href="#">Jun 10, 2003</a>
			<a href="#">May 03, 1999</a> *	<a href="#">Oct 18, 2000</a> *		<a href="#">Nov 29, 2002</a>	<a href="#">Jun 11, 2003</a>
			<a href="#">Oct 08, 1999</a> *	<a href="#">Oct 18, 2000</a>		<a href="#">Dec 05, 2002</a>	<a href="#">Jun 28, 2003</a>
			<a href="#">Oct 13, 1999</a>	<a href="#">Oct 19, 2000</a>			
			<a href="#">Oct 13, 1999</a>	<a href="#">Oct 19, 2000</a>			
			<a href="#">Nov 11, 1999</a>	<a href="#">Oct 22, 2000</a>			
				<a href="#">Nov 02, 2000</a>			
				<a href="#">Nov 10, 2000</a>			
				<a href="#">Dec 03, 2000</a>			

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## WHOIS SEARCH RESULTS

### WHOIS RECORD FOR:

**kleevage.tv**

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Registrant:  
Kleevco Productions (KLEEVAGE3-DOM)  
8635 W. Sahara Ave.  
PMB 563  
Las Vegas, NV 89117  
US

Domain Name: KLEEVAGE.TV

Administrative Contact:  
Kleevco Productions (312429280) [kleevage@EARTHLINK.NET](mailto:kleevage@EARTHLINK.NET)  
8635 W. Sahara Ave.  
PMB 563  
Las Vegas, NV 89117  
US  
(702) 240-2563 fax: 999 999 9999  
Technical Contact:  
Network Solutions, Inc. (HOST-ORG) [customerservice@networksolutions.com](mailto:customerservice@networksolutions.com)  
21355 Ridgetop Circle  
Dulles, VA 20166  
US  
1-888-642-9675 fax: 571-434-4620

Record expires on 12-Jan-2005.  
Record created on 12-Jan-2001.  
Database last updated on 1-Nov-2003 14:16:02 EST.

Domain servers in listed order:

NS76.WORLDDNIC.COM 216.168.225.216  
NS75.WORLDDNIC.COM 216.168.225.215

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## WHOIS SEARCH RESULTS

### WHOIS RECORD FOR

**kleeavage.net**

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Registrant:  
Kleevco Productions (KLEEVAGE2-DOM)  
8635 W. Sahara Ave.  
PMB 563  
Las Vegas, NV 89117  
US

Domain Name: KLEEVAGE.NET

Administrative Contact:  
Kleevco Productions (312429280) kleeavage@EARTHLINK.NET  
8635 W. Sahara Ave.  
PMB 563  
Las Vegas, NV 89117  
US  
(702) 240-2563 fax: 999 999 9999  
Technical Contact:  
Network Solutions, Inc. (HOST-ORG) customerservice@networksolutions.com  
21355 Ridgetop Circle  
Dulles, VA 20166  
US  
1-888-642-9675 fax: 571-434-4620

Record expires on 12-Jan-2005.  
Record created on 12-Jan-2001.  
Database last updated on 1-Nov-2003 14:15:24 EST.

Domain servers in listed order:

NS75.WORLDDNIC.COM 216.168.225.215  
NS76.WORLDDNIC.COM 216.168.225.216

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## WHOIS SEARCH RESULTS

### WHOIS RECORD FOR

**kaylakleevege.tv**

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Registrant:  
Kleeveco Productions (KAYLAKLEEVEGE4-DOM)  
8635 W. Sahara Ave.  
PMB 563  
Las Vegas, NV 89117  
US

Domain Name: KAYLAKLEEVEGE.TV

Administrative Contact:  
Kleeveco Productions (312429280) kleevege@EARTHLINK.NET  
8635 W. Sahara Ave.  
PMB 563  
Las Vegas, NV 89117  
US  
(702) 240-2563 fax: 999 999 9999

Technical Contact:  
Network Solutions, Inc. (HOST-ORG) customerservice@networksolutions.com  
21355 Ridgetop Circle  
Dulles, VA 20166  
US  
1-888-642-9675 fax: 571-434-4620

Record expires on 12-Jan-2005.  
Record created on 12-Jan-2001.  
Database last updated on 1-Nov-2003 14:14:38 EST.

Domain servers in listed order:

NS74.WORLDDNIC.COM 216.168.225.214  
NS73.WORLDDNIC.COM 216.168.225.213

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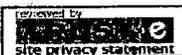
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## WHOIS SEARCH RESULTS

### WHOIS RECORD FOR

**kaylakleeavage.net**

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Registrant:  
Kleeenco Productions (KAYLAKLEEVAAGE3-DOM)  
8635 W. Sahara Ave.  
PMB 563  
Las Vegas, NV 89117  
US

Domain Name: KAYLAKLEEVAAGE.NET

Administrative Contact:  
Kleeenco Productions (312429280) kleeavage@EARTHLINK.NET  
8635 W. Sahara Ave.  
PMB 563  
Las Vegas, NV 89117  
US  
(702) 240-2563 fax: 999 999 9999  
Technical Contact:  
Network Solutions, Inc. (HOST-ORG) customerservice@networksolutions.com  
21355 Ridgeway Circle  
Dulles, VA 20166  
US  
1-888-642-9675 fax: 571-434-4620

Record expires on 12-Jan-2005.  
Record created on 12-Jan-2001.  
Database last updated on 1-Nov-2003 14:13:44 EST.

Domain servers in listed order:

NS71.WORLDDNIC.COM 216.168.225.211  
NS72.WORLDDNIC.COM 216.168.225.212

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## WHOIS SEARCH RESULTS

### WHOIS RECORD FOR

**kayla-kleevege.com**

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Registrant:  
Kleevco Productions (KAYLA-KLEEVAGE-DOM)  
8635 W. Sahara Ave.  
PMB 563  
Las Vegas, NV 89117  
US

Domain Name: KAYLA-KLEEVAGE.COM

Administrative Contact:  
Kleevco Productions (312429269) kleevege@EARTHLINK.NET  
8635 W. Sahara Ave.  
PMB 563  
Las Vegas, NV 89117  
US  
(702) 240-2563 fax: 999 999 9999  
Technical Contact:  
CWIE LLC (DA17599-OR) dnsadmin@CWIE.NET  
CWIE LLC  
1125 E Glendale Ave  
Phoenix, AZ 85020  
US  
602-248-4963 fax: 602-274-2591

Record expires on 31-Jul-2005.  
Record created on 01-Aug-1998.  
Database last updated on 1-Nov-2003 14:11:49 EST.

Domain servers in listed order:

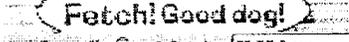
NS1.CWIE.NET 64.38.192.10  
NS2.CWIE.NET 64.38.192.11

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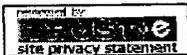
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## WHOIS SEARCH RESULTS

### WHOIS RECORD FOR

**kaylakleevage.com**

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Registrant:  
Kleevco Productions (KAYLAKLEEVAGE2-DOM)  
8635 W. Sahara Ave.  
PMB 563  
Las Vegas, NV 89117  
US

Domain Name: KAYLAKLEEVAGE.COM

Administrative Contact:  
Kleevco Productions (312429280) [kleevage@EARTHLINK.NET](mailto:kleevage@EARTHLINK.NET)  
8635 W. Sahara Ave.  
PMB 563  
Las Vegas, NV 89117  
US  
(702) 240-2563 fax: 999 999 9999  
Technical Contact:  
CWIE LLC (DA17599-OR) [dnsadmin@CWIE.NET](mailto:dnsadmin@CWIE.NET)  
CWIE LLC  
1125 E Glendale Ave  
Phoenix, AZ 85020  
US  
602-248-4963 fax: 602-274-2591

Record expires on 31-Jul-2008.  
Record created on 01-Aug-1998.  
Database last updated on 1-Nov-2003 14:13:01 EST.

Domain servers in listed order:

NS1.CWIE.NET 64.38.192.10  
NS2.CWIE.NET 64.38.192.11

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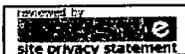
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Applicant's Responses to Opposer's Request for Documents, Request No. 14

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**MORE BIG-TIT XXX HARDCORE!**

**#1 IN BIG BOOBS**

# SCORE

JUNE 2003



## **BUSTY NEWCOMERS SUPERSTARS & LEGENDS**

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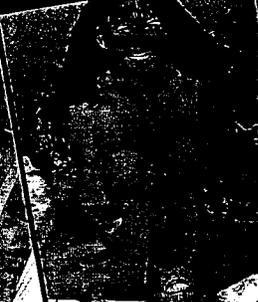
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**MELANIE ADDISON**



**BRITTANY & MARY**



**INES CUDNA**



**MICHELLE BOND**



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KP 314

**MISTRESS RHIANNON: INTERVIEW & PHOTOS OF  
THE GIRL WHO WAS 'TOO FAR OUT' FOR SCORE!**

0 1117183

06



can't believe the amount of cum that was splattered all over Melissa.

Which leads me to a question: Do you encourage your male models to do anything to maximize the amount of splooge they splatter? Do they refrain from shooting their seed for a number of days before being called upon?—S.S., Detroit, Michigan

Dear S.S.: Good question. Of course, these guys are all big-tit men and they relish the opportunity to fuck a SCORE Girl. And, yes, we do encourage our male studs to refrain from sexual activity for a few days before their hardcore shoot. That way, they'll be hard, ready for action and ready to shoot...photos and their loads.

### REAL-LIFE KAYLA KLEEVAGE

Dear SCORE,

The "At Home" feature of Kayla Kleevage in the February issue was really appreciated. It's great to get the chance to see these women as they are in "real life."

The picture that really got my attention was the one of Kayla outside the food store. If I was ever at the supermarket and saw a woman like Kayla (then again, how many women like Kayla are there?) shopping for groceries, I'd shoot my load on the spot.

I'm thinking of moving to Las Vegas just so I can go food shopping and maybe run into this goddess. —M.R., Seattle, Washington

### BOOBS THROUGH THE YEARS

Dear SCORE,

I just turned 29 last month, marking a little more than a decade as a SCORE Man. After all these years, SCORE and Voluptuous remain the highest-quality big-bust mags anywhere. I've seen them all, and none come close to your quality and ability to capture beautiful, big-busted women. Even when Hef and Playboy try their hands at special features on voluptuous women, they cannot hit the mark the way you guys do. They do not know how to photograph the girls with a boob-man's eye.

With time, my tastes have changed, and SCORE has changed, too. When I was 18 years old, I really believed that girls with breasts that looked as big and as round as volleyballs were natural. Looking back, I can hardly believe I was that naive. But those were the greatest days, and it didn't matter whether the girls' breasts were real, as long as the girls were busty.



Why was the February Xtra section with (clockwise from top right) Melissa Carey, Kate and Anne-Marie special? Because all three maintained eye contact with the camera while they were riding bone or sucking down cock, that's why.



Can you imagine being out and seeing Kayla Kleevage (left) and Kandi Cox on their bikes? You'd yield for big boobs!



KAYLA KLEEVAGE



12 SCORE

KP 316

# SCORE VIDEO PICK OF THE MONTH

RATED XXX! NEW ON DVD & VIDEO!

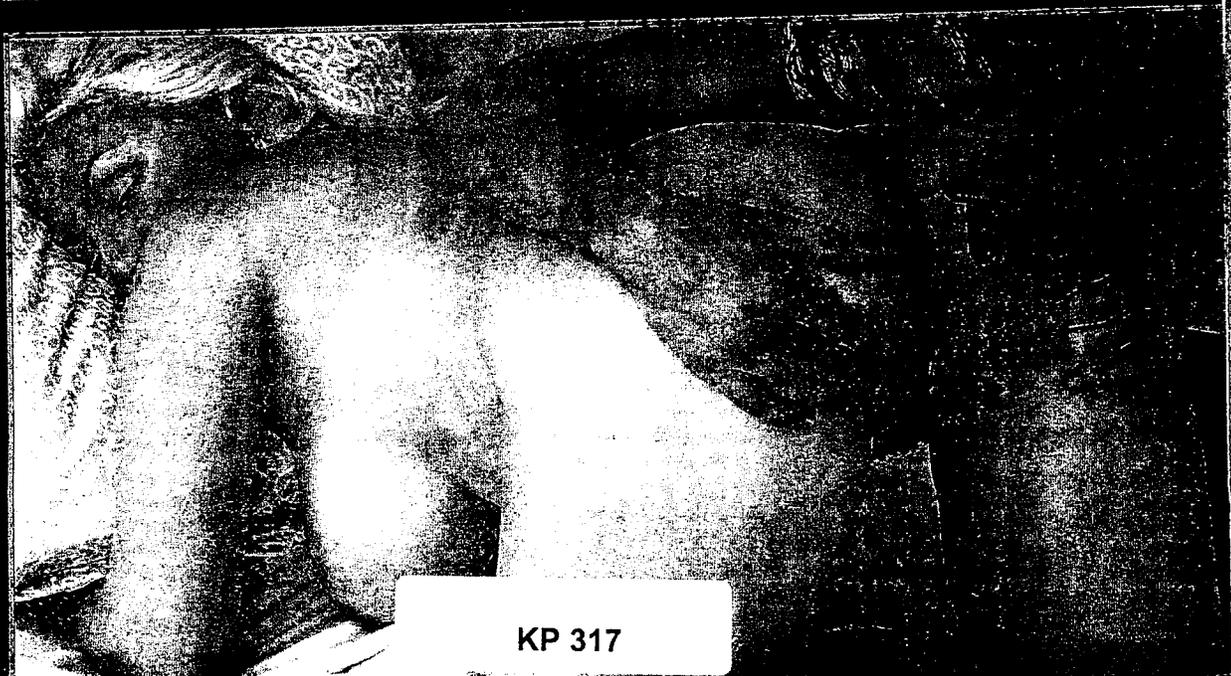
## SCORE Xtra 8

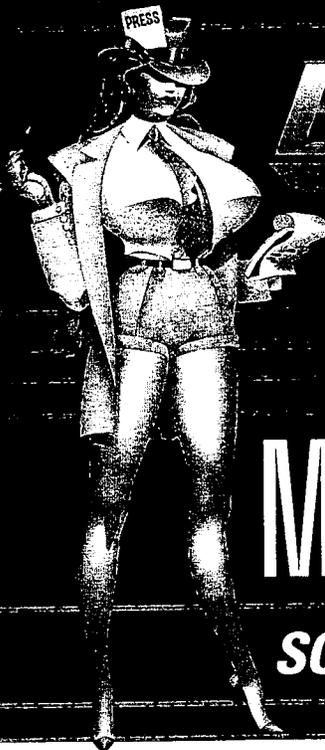
Kelly Madison in her XXX debut, Kayla Kleevage takes it up the ass and lots more.

We're boob-men, and we're in it for the tits. But, sometimes, we need to see our favorite big-busted babes getting hard, old-fashioned fuckings, and it can be so frustrating to walk into the video store and see nothing but the same old crap in the so-called big-tit section. Thank goodness for the *SCORE Xtra* series, and thank goodness for *SCORE Xtra #8*, the latest two-hour, big-tit fuckathon on video and DVD. In the tradition of its best-selling predecessors, *Xtra #8* features some XXX boy-girl debuts, one by Newcomer of the Year finalist Kelly Madison, another by blonde sweetie Madison and one by Brit babe Hannah Callow (right); rare on-camera-fucking by beautiful Lisa Ann and raunchy fuck action with Alexis Amore and *SCORE* fave Kayla Kleevage (left). Six babes in all.



HANNA CALLOW





# BOOB BEAT

## BIG BOOBS IN THE NEWS

BY ELLIOT JAMES

# MEGA-BOOB DOMINATION!

## SCORE GIRLS RULE THE AVN SHOW IN VEGAS

It's high noon in Las Vegas, a week into the year 2003. Maxi Mounds, Kayla Kleevage and Minka, three of the biggest heavyhitters in the mega-boob universe, have just entered the sprawling Sands Expo Center. Their gigantic bumpers cut a path through the glassy-eyed crowd like the bows of three supertankers slicing through the ocean.

The girls put on their black SCORE sashes, which conveniently nestle in the cavernous crack of their colossal cleavages, and they step up to the plate at the Pure Play Media booth, where they will autograph and give away thousands of *Mega-Boob Olympics* photos for the next four hours and promote the DVDs for *MBO* and *Boobs Ahoy (Boob Cruise 2000)*. The mob scene begins immediately.

For the next three days, Maxi, Kayla and Minka sign *Mega-Boob* items and pose for countless photographs until they're practically seeing stars. Everyone wants their attention, their love, one more picture, please...

We're at the 4th Annual Adult Entertainment Expo, the show that used to be known as the adult section of the Consumer Electronics Show. The company that publishes the trade magazine *Adult Video News* now runs this major convention, long a yearly fixture in Vegas. The show gives the hotels the



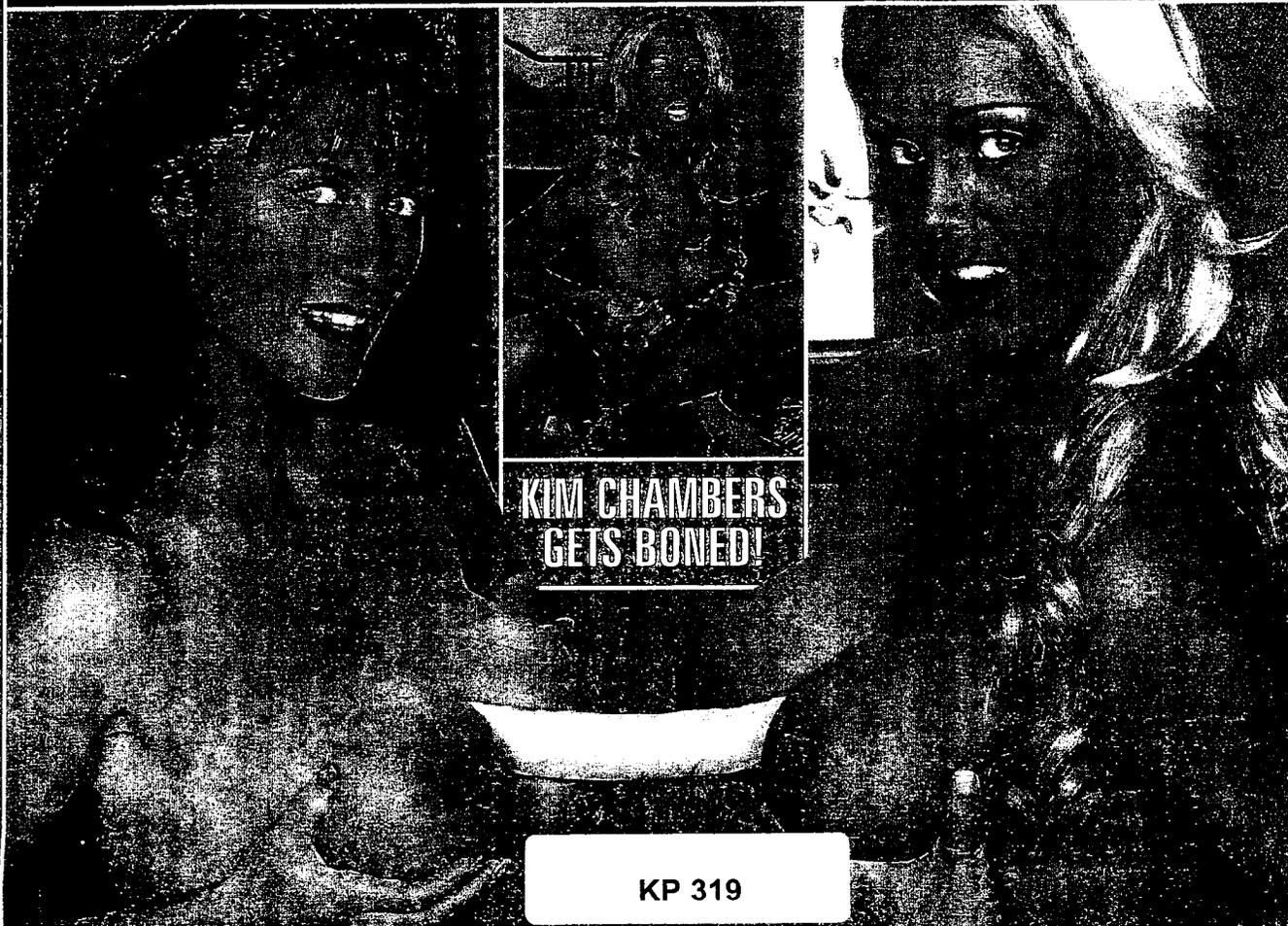
Thank you Kayla Kleevage, Maxi Mounds and Minka! They repped SCORE at the AVN Expo.

# SCORE XTRA

JUNE 2003 • VOLUME 4 • NUMBER 6



**KAT FUCKS HER WAY INTO SCORE!**



**KIM CHAMBERS  
GETS BONED!**

KP 319

**BRITTANY & MARY SHARE A DILDO!**

# KAT: "BRING ME YOUR BIGGEST DICK"

Size is important to this cock lover from Vegas. She's not talking about dick.



Fucking in the great outdoors is nothing new to Kat, a DDD-cup newcomer from Las Vegas who knows where she belongs—Sin City—and knows what she should be doing: fucking. We're not gonna bullshit you. Kat's no first-timer to on-camera cock smoking. For her debut, Kat could have posed all by herself and maybe snuck a dildo into her pussy on the last page, but what would've been the point? Kat was willing to fuck right off the bat, and we weren't going to say no. "There's something special about getting naked and fucking outdoors," she said. "This was a pretty secluded spot, and the chances of us getting caught were pretty slim, but there was always that chance. I made sure to make extra-loud slurping noises when I was eating his dick because I was hoping someone would hear us."

KP 320



# UNITED STATES PATENT AND TRADEMARK OFFICE

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## Trademark Electronic Search System(Tess)

TESS was last updated on Wed Jan 7 04:25:00 EST 2004

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- FREE FORM
- BROWSE DICT
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- HELP

[Logout](#) Please logout when you are done to release system resources allocated for you.

## Record 1 out of 1

### Check Status

*(TARR contains current status, correspondence address and attorney of record for this mark. Use the "Back" button of the Internet Browser to return to TESS)*

### Typed Drawing

**Word Mark** KAT KLEEVAGE

**Goods and Services** IC 041. US 100 101 107. G & S: PROVIDING LIVE ADULT ENTERTAINMENT PICTURES AND PERFORMANCES VIA THE WEB; PERSONAL APPEARANCES BY A CELEBRITY ADULT ENTERTAINER. FIRST USE: 20000600. FIRST USE IN COMMERCE: 20000600

**Mark Drawing Code** (1) TYPED DRAWING

**Serial Number** 76543254

**Filing Date** September 8, 2003

**Current Filing Basis** 1A

**Original Filing Basis** 1A

**Owner** (APPLICANT) Shaffer, Kathryn Evelyn INDIVIDUAL UNITED STATES 3230 East Flamingo Road #324 Las Vegas NEVADA 89121

**Attorney of Record** Scott W. Kelley

**Type of Mark** SERVICE MARK

**Register** PRINCIPAL

**Live/Dead Indicator** LIVE

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- FREE FORM
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http://app.uspto.gov/servlet/tarr?regser=serial&entry=76543254

**Thank you for your request. Here are the latest results from the TARR web server.**

**This page was generated by the TARR system on 2004-01-07 19:04:39 ET**

**Serial Number:** 76543254

**Registration Number:** (NOT AVAILABLE)

**Mark (words only):** KAT KLEEVAGE

**Standard Character claim:** No

**Current Status:** Newly filed application, not yet assigned to an examining attorney.

**Date of Status:** 2003-09-11

**Filing Date:** 2003-09-08

**Transformed into a National Application:** No

**Registration Date:** (DATE NOT AVAILABLE)

**Register:** Principal

**Law Office Assigned:** LAW OFFICE 116

**If you are the applicant or applicant's attorney and have questions about this file, please contact the Trademark Assistance Center at TrademarkAssistanceCenter@uspto.gov**

**Current Location:** M7D -TMO LAW OFFICE 116 - DOCKET CLERK

**Date In Location:** 2003-12-12

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**LAST APPLICANT(S)/OWNER(S) OF RECORD**

---

1. Shaffer, Kathryn Evelyn

**Address:**

Shaffer, Kathryn Evelyn  
3230 East Flamingo Road #324  
Las Vegas, NV 89121  
United States

**Legal Entity Type:** Individual

**Country of Citizenship:** United States

---

**GOODS AND/OR SERVICES**

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PROVIDING LIVE ADULT ENTERTAINMENT PICTURES AND PERFORMANCES VIA THE WEB;  
PERSONAL APPEARANCES BY A CELEBRITY ADULT ENTERTAINER

**International Class:** 041

**First Use Date:** 2000-06-00

**First Use in Commerce Date:** 2000-06-00

**Basis:** 1(a)

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**ADDITIONAL INFORMATION**

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(NOT AVAILABLE)

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**MADRID PROTOCOL INFORMATION**

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(NOT AVAILABLE)

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**PROSECUTION HISTORY**

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(NOT AVAILABLE)

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**CONTACT INFORMATION**

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**Correspondent (Owner)**

Scott W. Kelley (Attorney of record)

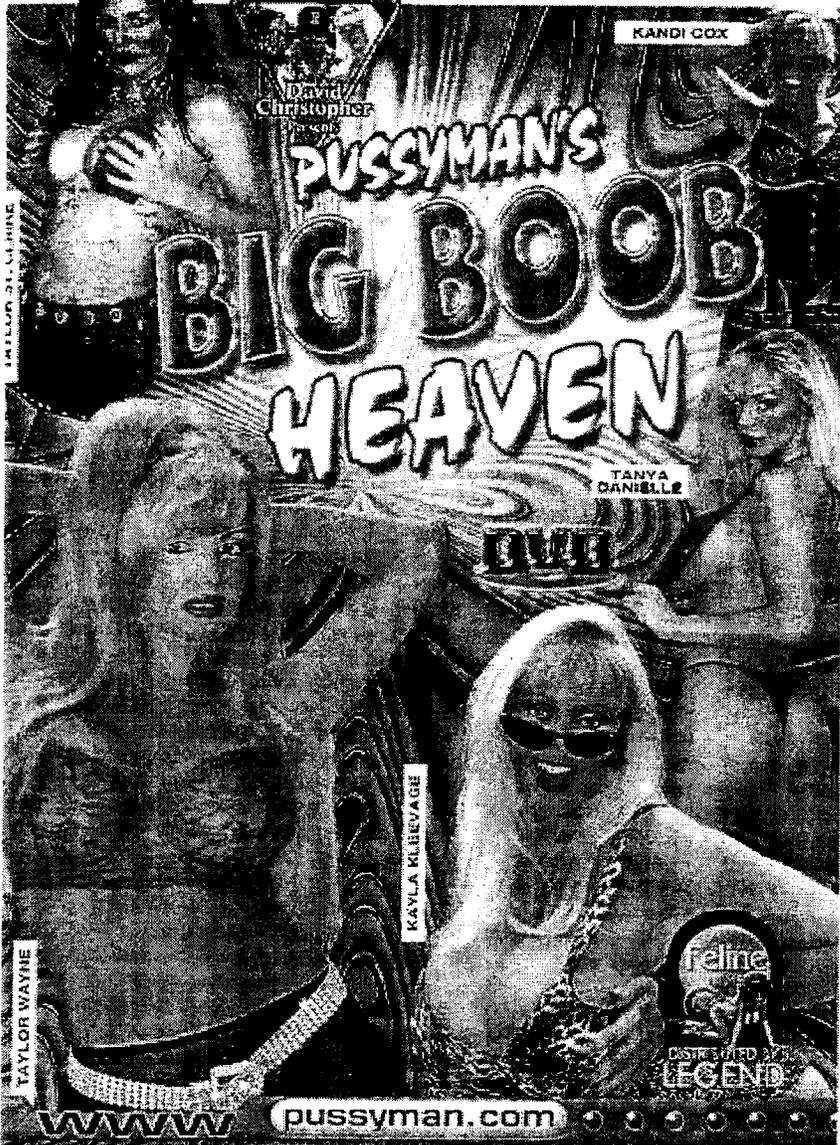
SCOTT W. KELLEY  
KELLY BAUERSFELD LOWRY & KELLEY, LLP  
6320 CANOGA AVENUE, SUITE 1650  
WOODLAND HILLS, CALIFORNIA 91367

**Phone Number:** (818) 347-7900

**Fax Number:** (818) 340-2859

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★ ★ ★ ★ ★ BEYOND THE PUSSY BARRIER

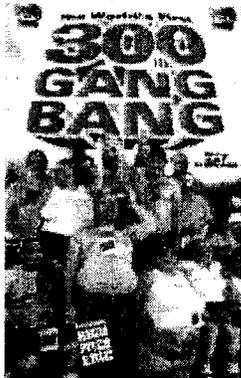
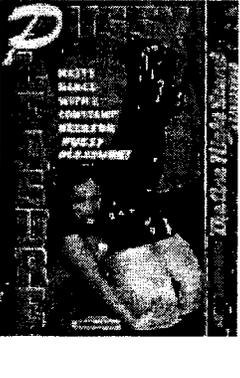




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All videos on this website are sent personally by me :-)  
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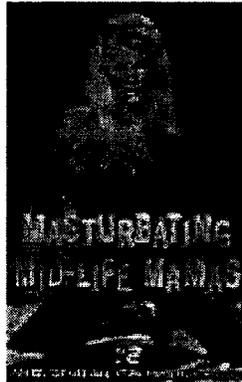
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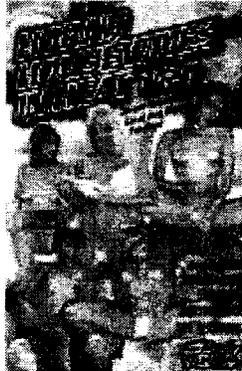
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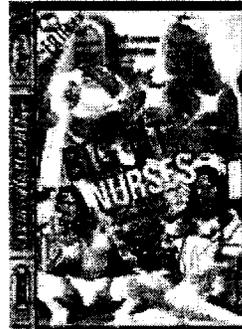
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