

ESTTA Tracking number: **ESTTA349068**

Filing date: **05/21/2010**

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

Proceeding	91177036
Party	Defendant Mujahid Ahmad
Correspondence Address	PATRICK I. REA TAYLOR & REA, PLC 3925 OLD LEE HWY , SUITE 200 FAIRFAX, VA 22030 UNITED STATES rea@taylorrealaw.com
Submission	Opposition/Response to Motion
Filer's Name	Patrick I. Rea
Filer's e-mail	rea@taylorrealaw.com
Signature	/Patrick Rea/
Date	05/21/2010
Attachments	2010-05-21 - Applicant's Response to Opposer's Motion to Quash.pdf (46 pages)(585264 bytes)

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

In the Matter of Serial No.
Filed on
For the Mark
Published for Opposition on

78/866376
April 20, 2006
NATIONSTAR
January 2, 2007

<p>Nationstar Mortgage LLC, <i>Opposer</i> vs. Mujahid Ahmad, <i>Applicant</i></p>	<p>Opposition No. 91177036</p>
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**APPLICANT'S RESPONSE TO OPPOSER'S MOTION TO QUASH NOTICE OF
TESTIMONY DEPOSITION**

Applicant hereby responds to Opposer's Motion to Quash Notice of Testimony Deposition filed in this matter May 20, 2010, and moves the Board to deny Opposer's motion for the reasons stated below. The instant motion relates to the deposition notice for witness Zulfikhar Sharieff ("Sharieff").

Facts

Beginning May 7, 2010, Applicant's counsel and Opposer's counsel engaged in an email dialogue regarding the testimony of Applicant's witnesses. Applicant's counsel identified three witnesses: Sharieff, Abid Hussain ("Hussain") and Mujahid Ahmad ("Applicant"). This dialogue specifically addressed the form of Sharieff's testimony – affidavit versus oral – and the date of an oral deposition. Exhibit A. The tentative

agreement reached between counsel called for all three depositions to be taken on May 19. In the words of Opposer's counsel, "That is fine." Exhibit A – May 11, 2010, email from Lloyd Smith to Patrick Rea. The depositions were noticed based on that tentative agreement. Exhibit B. Applicant's counsel believed that scheduling three depositions in one day was reasonable based on the amount of time consumed during Opposer's counsel's discovery deposition of Applicant and the testimony deposition of Opposer's witness. Opposer's counsel did not disagree prior to the deposition notices. In response to the deposition notices, Opposer's counsel sent a letter objecting to the deposition schedule. Exhibit C. Specifically, Opposer's counsel's letter demanded more time to cross-examine the Applicant. Applicant's counsel contacted Opposer's counsel to discuss Opposer's counsel's objection. Based on that conversation, Applicant's counsel reasonably believed that Opposer's counsel wanted more time to cross-examine all three of Applicant's witnesses. Because Applicant's counsel's schedule would not allow re-scheduling the three depositions within the Applicant's remaining testimony period, the parties agreed to extend Applicant's testimony period by thirty days. Applicant's counsel, based on his understanding of the afore-described telephone conversation, cancelled the court reporter and informed the witnesses that the depositions would be re-scheduled. Exhibit D. Opposer's counsel, based on his understanding of the afore-described telephone conversation, drafted a letter documenting his understanding of the deposition schedule. Exhibit E. Upon seeing Opposer's counsel's letter and recognizing the conflict in understanding, Applicant's counsel promptly alerted Opposer's counsel to the discrepancy and advised Opposer's counsel that the depositions had been cancelled and would be re-noticed once dates

were set. Exhibit F. Once the availability of the witnesses was ascertained, Applicant's counsel re-noticed the depositions. Exhibits G and H. As an accommodation to Opposer's counsel only one witness is scheduled to appear on a single day.

During the course of re-scheduling witnesses, Applicant's counsel learned of witness Sharieff's intent to travel during the entire months of June and July. The only time prior to June 1 in which Sharieff would be available was the afternoon of June 26. As such Sharieff's deposition was scheduled for 1 pm on June 26. Applicant's counsel was aware that Sharieff's deposition would conflict with Opposer's counsel's intent to attend the International Trademark Association ("ITA") annual meeting in Boston during the week of May 24. Due to that conflict, Applicant's counsel made special effort to direct Opposer's counsel's attention to the date of Sharieff's deposition. Exhibit I – May 19, 2010, email message from Patrick Rea to Lloyd Smith and Bruce McDonald. Opposer's counsel responded that they scheduled date of Sharieff's deposition was "impossible". Exhibit I – May 20, 2010, email message from Bruce McDonald to Patrick Rea. Applicant's counsel responded with offers of accommodation, including telephone participation by Opposer's counsel. Exhibit I – May 20, 2010, email message from Patrick Rea to Lloyd Smith and Bruce McDonald. Opposer's counsel rejected any such accommodation as inadequate, insisted that he and all other qualified attorneys at Opposer's counsel's law firm would be unavailable on June 26 and filed the Motion to Quash to which this reply is directed.

Argument

Opposer objects to the Applicant's notice of intent to take deposition testimony of witness Sharieff on May 26, 2010, because (1) this date coincides with Opposer's

counsel's intent to attend the ITA annual meeting in Boston, and (2) Applicant's counsel knows that Opposer's counsel intends to attend this meeting. In its motion, Opposer has referred to Applicant's counsel as engaging in "duplicity" to prevent Opposer's counsel from cross-examining Sharieff. The record does not support Opposer's argument. Applicant's counsel has been in regular contact with Opposer's counsel, Applicant's counsel has tried to accommodate and raise issues regarding the scheduling of depositions prior to noticing them, and any confusion and inconvenience is the direct result of Opposer's counsel changing its mind about whether three depositions could be conducted in one day. Applicant's counsel scheduled the three depositions as agreed by the parties and only cancelled the depositions to accommodate Opposer's counsel's change of mind. All of Opposer's counsel's problems are the direct result of Applicant's counsel's attempts to deal with Opposer's counsel's objection to scheduling three depositions in one day.

A testimony deposition to be taken in the United State may be noticed for any reasonable time and place during a party's testimony period. 37 CFR § 2.123(c). Opposer has made no credible argument that the time or place of the scheduled deposition is unreasonable. The fact that the scheduled deposition is inconvenient to Opposer's counsel's participation in the ITA annual meeting does not make such scheduled deposition not reasonable under Trademark Rule 2.123(c). In substance, Opposer's counsel argues that his availability is of greater importance than the witness's availability. If the Board were to agree with Opposer's counsel's position, it would encourage counsel to make him or herself unavailable for the purpose of disrupting the collection of deposition testimony. Bad policy indeed.

Opposer's counsel has rejected any accommodation by Applicant's counsel. Opposer's counsel's law firm, Buchanan Ingersoll & Rooney, PC, ("Buchanan Ingersoll") has 450 attorneys and government relations professionals. Exhibit J. At least four attorneys from Buchanan Ingersoll have entered an appearance in this opposition. The witness Sharieff was a customer of the Applicant identified during discovery, who would testify about his business dealings with Applicant. Sharieff is not a party to this opposition proceeding, has no financial interest in the outcome of this proceeding and is not related in any way to the Applicant. Despite the nature of Sharieff's testimony and the substantial resources of Buchanan Ingersoll, Opposer's counsel asks us to accept his rather unbelievable assertion that not one qualified Buchanan Ingersoll attorney is available to attend the deposition of Sharieff on May 26.

Finally, Applicant's counsel has noticed the deposition for Sharieff on May 26, 2010, and the other witnesses for the June 8 and June 9, 2010. Opposer's counsel accuses Applicant's counsel of scheduling Sharieff's May 26 deposition "for a plainly dishonest reason". Opposer's counsel engages in rather high language simply because he cannot accept the limited availability witness Sharieff. As the record in this matter shows, Applicant's counsel has acted consistently in an open and cooperative manner with Opposer's counsel. When faced with the limited availability of witness Sharieff, Applicant's counsel has had no choice but to notice Sharieff's deposition for May 26. Applicant's counsel did so promptly and offered to accommodate Opposer's counsel's participation in the deposition. There is absolutely nothing dishonest about Applicant's counsel's actions and Applicant's counsel has not engaged in duplicity. If the situation were reversed, Opposer's counsel would be compelled to act in the same

manner. Furthermore, if Applicant's counsel possessed the bad motives ascribed by Opposer's counsel, Applicant's counsel would have scheduled all three of its witness depositions during the ITA annual meeting. This is not what Applicant's counsel did. Only the witness whose availability was limited was scheduled coincidentally with the ITA annual meeting.

For the reasons stated above, Applicant requests that the Board deny Opposer's Motion to Quash Notice of Testimony Deposition.

Respectfully submitted,

MUJAHID AHMAD



Patrick I. Rea
Taylor & Rea, PLC
3925 Old Lee Hwy, Ste 200
Fairfax, VA 22030
(703) 385-3322
(703) 385-5406 Fax
rea@taylorrealaw.com

Date: May 21, 2010

EXHIBIT A

Patrick Rea

From: "Smith, S. Lloyd" <lloyd.smith@bipc.com>
To: "Patrick Rea" <prea1@cox.net>
Sent: Tuesday, May 11, 2010 1:50 PM
Subject: RE: Nationstar v. Ahmad
Patrick -

That is fine. Please confirm that time and date, and let me know the address as soon as possible.

- Lloyd

From: Patrick Rea [mailto:prea1@cox.net]
Sent: Monday, May 10, 2010 9:57 AM
To: Smith, S. Lloyd
Subject: RE: Nationstar v. Ahmad

Lloyd - We are trying to coordinate the availability of witnesses so that all the live testimony can occur in one day. We trying for Wednesday, May 19 beginning at about 10 am.. Does that day work for you? I expect to send out the notices later today.

Patrick Rea
703-385-3322

----- Original Message -----

From: Smith, S. Lloyd
To: Patrick Rea
Cc: Ibrahim, Bassam ; Bayou, Jean ; D'Angelo, Jennifer M.
Sent: Friday, May 07, 2010 6:31 PM
Subject: RE: Nationstar v. Ahmad

Patrick -

Nationstar does not agree to stipulate to the testimony. Please advise as to the date you propose for live testimony. May 17th?

Regards,

Lloyd

From: Patrick Rea [mailto:rea@taylorrealaw.com]
Sent: Friday, May 07, 2010 10:01 AM
To: Smith, S. Lloyd
Subject: Nationstar v. Ahmad

Lloyd:

We are preparing to notice the testimony of our witnesses in the Nationstar opposition. We intend to use three witnesses: Ahmad, Zulihaar Sharieff and Abid Hussain.

Mr. Sharieff and Mr. Hussain were two of Ahmad's real estate purchasers. We anticipate their testimony to be fairly brief and would prefer to prepare the testimony by

affidavit. That, of course, requires stipulation of the parties. I have met with these witnesses and explained the circumstances of their testimony. If you will stipulate to testimony by affidavit, they have agreed to make themselves available for testimony during your rebuttal period. Please let me know whether you will stipulate. Otherwise, we will notice the testimony on Monday for the following week.

Regards,

Patrick Rea
703-385-3322

TAX ADVICE DISCLAIMER: Any federal tax advice contained in this communication (including attachments) was not intended or written to be used, and it cannot be used, by you for the purpose of (1) avoiding any penalty that may be imposed by the Internal Revenue Service or (2) promoting, marketing or recommending to another party any transaction or matter addressed herein. If you would like such advice, please contact us.

Above email is for intended recipient only and may be confidential and protected by attorney/client privilege.

If you are not the intended recipient, please advise the sender immediately.

Unauthorized use or distribution is prohibited and may be unlawful.

TAX ADVICE DISCLAIMER: Any federal tax advice contained in this communication (including attachments) was not intended or written to be used, and it cannot be used, by you for the purpose of (1) avoiding any penalty that may be imposed by the Internal Revenue Service or (2) promoting, marketing or recommending to another party any transaction or matter addressed herein. If you would like such advice, please contact us.

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EXHIBIT B

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

In the Matter of Serial No.	78/866376
Filed on	April 20, 2006
For the Mark	NATIONSTAR
Published for Opposition on	January 2, 2007

<p>Nationstar Mortgage LLC, <i>Opposer</i></p> <p>vs.</p> <p>Mujahid Ahmad, <i>Applicant</i></p>	<p>Opposition No. 91177036</p>
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NOTICE OF TESTIMONY DEPOSITION OF ZULFIKHAR SHARIEFF

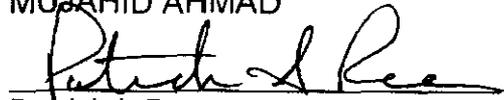
PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure and 37 CFR § 2.123, Applicant, Mujahid Ahmad will take the oral testimony deposition of:

Zulfikhar Sharieff
4363 Ensbrook Lane
Dale City, VA 22193

The deponent is a person who received services from the applicant in the above captioned matter. The deposition will take place on Wednesday, May 19, 2010, in the offices of the applicant's attorney located at 3925 Old Lee Highway, Suite 200, Fairfax, VA 22030. The deposition will begin at 1 pm. The deposition will take place before a Notary Public or other officer authorized by law to administer oaths. The deposition will be recorded by audio, video and/or other stenographic means.

Respectfully submitted,

MUJAHID AHMAD



Patrick I. Rea

Taylor & Rea, PLC

3925 Old Lee Hwy, Ste 200

Fairfax, VA 22030

(703) 385-3322

(703) 385-5406 Fax

rea@taylorrealaw.com

Date: May 11, 2010

CERTIFICATE OF MAILING

I hereby certify that on May 11, 2010, the foregoing NOTICE OF TESTIMONY DEPOSITION OF ZULFIKHAR SHARIEFF is being deposited with the United States Postal Service, with sufficient postage as first-class mail, in an envelope addressed to

S. Lloyd Smith
Bryce J. Maynard
Buchanan, Ingersoll & Rooney PC
P.O. Box 1404
Alexandria, VA 22314


Patrick I. Rea

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

In the Matter of Serial No. 78/866376
Filed on April 20, 2006
For the Mark NATIONSTAR
Published for Opposition on January 2, 2007

<p>Nationstar Mortgage LLC, <i>Opposer</i> vs. Mujahid Ahmad, <i>Applicant</i></p>	<p>Opposition No. 91177036</p>
--	--------------------------------

NOTICE OF TESTIMONY DEPOSITION OF MUJAHID AHMAD

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure and 37 CFR § 2.123, Applicant, Mujahid Ahmad will take the oral testimony deposition of:

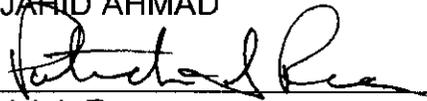
Mujahid Ahmad
2001 North Daniel Street
No. 102
Arlington, VA 22201

The deponent is the applicant in the above captioned matter. The deposition will take place on May 19, 2010, in the offices of the applicant's attorney located at 3925 Old Lee Highway, Suite 200, Fairfax, VA 22030. The deposition will begin at 3 pm. The deposition will take place before a Notary Public or other officer authorized by law to administer oaths. The deposition will be recorded by audio, video and/or other stenographic means.

Respectfully submitted,

MUJAHID AHMAD

Date: May 11, 2010



Patrick I. Rea
Taylor & Rea, PLC
3925 Old Lee Hwy, Ste 200
Fairfax, VA 22030
(703) 385-3322
(703) 385-5406 Fax
rea@taylorrealaw.com

CERTIFICATE OF MAILING

I hereby certify that on May 11, 2010, the foregoing NOTICE OF TESTIMONY DEPOSITION OF MUJAHID AHMAD is being deposited with the United States Postal Service, with sufficient postage as first-class mail, in an envelope addressed to

S. Lloyd Smith
Bryce J. Maynard
Buchanan, Ingersoll & Rooney PC
P.O. Box 1404
Alexandria, VA 22314


Patrick I. Rea

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

In the Matter of Serial No.
Filed on
For the Mark
Published for Opposition on

78/866376
April 20, 2006
NATIONSTAR
January 2, 2007

<p>Nationstar Mortgage LLC, <i>Opposer</i> vs. Mujahid Ahmad, <i>Applicant</i></p>	<p>Opposition No. 91177036</p>
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NOTICE OF TESTIMONY DEPOSITION OF ABID HUSSAIN

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure and 37 CFR § 2.123, Applicant, Mujahid Ahmad will take the oral testimony deposition of:

Abid Hussain
7724 Camp Alger Avenue
Falls Church, VA 22042

The deponent is a person who received services from the applicant in the above captioned matter. The deposition will take place on May 19, 2010, in the offices of the applicant's attorney located at 3925 Old Lee Highway, Suite 200, Fairfax, VA 22030. The deposition will begin at 12 noon. The deposition will take place before a Notary Public or other officer authorized by law to administer oaths. The deposition will be recorded by audio, video and/or other stenographic means.

Respectfully submitted,

MUJAHID AHMAD



Patrick I. Rea
Taylor & Rea, PLC
3925 Old Lee Hwy, Ste 200
Fairfax, VA 22030
(703) 385-3322
(703) 385-5406 Fax
rea@taylorrealaw.com

Date: May 11, 2010

CERTIFICATE OF MAILING

I hereby certify that on May 11, 2010, the foregoing NOTICE OF TESTIMONY DEPOSITION OF ABID HUSSAIN is being deposited with the United States Postal Service, with sufficient postage as first-class mail, in an envelope addressed to

S. Lloyd Smith
Bryce J. Maynard
Buchanan, Ingersoll & Rooney PC
P.O. Box 1404
Alexandria, VA 22314

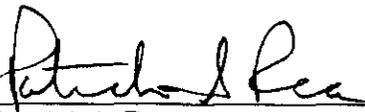

Patrick I. Rea

EXHIBIT C

Buchanan Ingersoll & Rooney PC
Attorneys & Government Relations Professionals

Fax Number

703 836 2021

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW.

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FAX COVER SHEET

Please deliver the following materials as soon as possible.

No of Pages
(Including cover sheet)

3

TO/COMPANY:	FAX/PHONE:
Patrick J. Rea, Esq. Taylor & Rea, PLC	703 385-5406 (fax) 703 385-3322 (phone)

FROM: Bruce McDonald
Reference No. 0055673-000033

Telephone #: 703 838 6590

Date 5/14/2010

IF YOU DO NOT RECEIVE THE DESIGNATED NUMBER OF PAGES, OR IF YOU EXPERIENCE ANY PROBLEM WITH THE TRANSMISSION OF THIS DOCUMENT, PLEASE CALL OUR FAX OPERATOR AT 703 836 6620

:0055673/000033;05/14/10 9:22 AM;0055673/000033;05/14/10 9:45

Buchanan Ingersoll & Rooney PC
Attorneys & Government Relations Professionals

Bruce A. McDonald
703 838 6580
bruce.mcdonald@blpc.com

P.O. Box 1404
Alexandria, VA 22313-1404

1737 King Street, Suite 500
Alexandria, VA 22314-2727

T 703 836 6820
F 703 836 2021

www.buchananingersoll.com

May 14, 2010

VIA FACSIMILE
(703) 385-3322

Patrick I. Rea, Esq.
TAYLOR & REA, PLC
3925 Old Lee Hwy, Suite 200
Fairfax, VA 22030

Re: *Nationstar Mortgage LLC v. Mujahid Ahmad*, Opposition No. 91177036 (TTAB),
Our Ref. 0055673.000033

Dear Mr. Rea:

This letter relates to your notices of depositions for the following witnesses on May 19, 2010 beginning at 10:00 a.m. at your office:

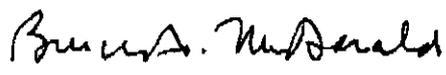
Time	Witness
12:00 noon	Abid Hussain
1:00 p.m.	Zulfikhar Sharieff
3:00 p.m.	Mujahid Ahmad

Opposer hereby objects to the lack of opportunity for cross-examination presented by your proposed schedule. It is Opposer's position that Applicant is engaged in fraud on the PTO, and the Board has alluded to prima facie evidence of such fraud in at least one written order. Opposer is entitled to an opportunity for full cross-examination on this issue. We demand that you allot at least one full day for the deposition of the Applicant and provide for a continuation of that deposition if the cross-examination is not completed within that time.

Patrick I. Rea, Esq.
May 14, 2010
Page 2

The undersigned is available for a continuation of these depositions on May 20, 2010.
Alternatively, please provide us with additional dates for this purpose.

Sincerely,



Bruce A. McDonald

BAM:jd

cc: Nationstar Mortgage, LLC

EXHIBIT D

CONFIRMATION OF CANCELLATION

Merrill LAD
 7654 Standish Place
 Rockville, MD 20855
 (301) 762-8282 Fax (301) 762-0606

Confirmation No.	TAYLFA01 1-179077	Date	05/14/2010	By	ARGUDI
Attn	Mr. Rea	Attorney	Patrick Rea, Esquire		
Firm	Taylor & Rea, PLC 3925 Old Lee Highway, Suite 200 Fairfax, VA 22030				
Fax No.	()	Phone No.	(703) 385-3322		
Cancelled By	Mr. Rea w/DMA via PC				

This email is being sent as confirmation of the following cancellation of deposition setting:

Style of Case	Nationstar Mortgage -v- Ahmad				
Witness(es)	Abid Hussian; Zulfikhar Sharieff; Mujahid Ahmand				
Deposition Date	05/19/2010	Time	12:00 PM		
Location	Taylor & Rea, PLC - 3925 Old Lee Highway, Suite 200				
City	Fairfax (22030)	State	VA		
Video	N	Subpoena	N		
RealTime	N	Interpreter	N	Language	
Remarks					

Please note this is a cancellation of the above deposition. Thank you for choosing Merrill LAD .

EXHIBIT E

Buchanan Ingersoll & Rooney PC
Attorneys & Government Relations Professionals

Bruce A. McDonald
703 838 6590
bruce.mcdonald@bipc.com

P.O. Box 1404
Alexandria, VA 22313-1404

1737 King Street, Suite 500
Alexandria, VA 22314-2727
T 703 836 6620
F 703 836 2021
www.buchananingersoll.com

May 14, 2010

VIA FACSIMILE
(703) 385-5406

Patrick I. Rea, Esq.
TAYLOR & REA, PLC
3925 Old Lee Hwy, Suite 200
Fairfax, VA 22030

Re: *Nationstar Mortgage LLC v. Mujahid Ahmad*, Opposition No. 91177036 (TTAB),
Our Ref. 0055673.000033

Dear Patrick:

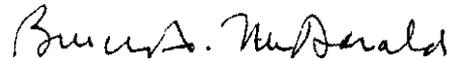
I am writing to confirm that we have agreed to enlarge the deposition schedule to provide Opposer with a full and fair opportunity to cross examine the witnesses. It is my understanding that:

- (1) May 19, 2010, will be reserved for the depositions of the third-party witnesses, Messrs. Hussain and Sharieff, to commence at 9:00 a.m. at your office.
- (2) The deposition of Mr. Ahmad will commence at 9:00 a.m. the following day, May 20, 2010.
- (3) If Opposer's cross-examination of these witnesses cannot be completed during the allotted periods, the depositions will be continued and re-convened on one or more dates that are mutually convenient to the parties.
- (4) Further to the above we have agreed on a 30-day enlargement of the trial calendar, which has been filed and served under separate cover.

Patrick I. Rea, Esq.
May 14, 2010
Page 2

We appreciate your courtesy in this matter.

Sincerely,



Bruce A. McDonald

BAM:jd

cc: Nationstar Mortgage, LLC

EXHIBIT F

William S. Taylor ^{VD}
Patrick I. Rea ^{VD}

D Member DC Bar
V Member VA Bar

TAYLOR & REA, PLC
ATTORNEYS AT LAW
Suite 200, 3925 Old Lee Highway
Fairfax, Virginia 22030

Telephone: (703) 385-3322
Fax: (703) 385-5406
Email Address
rea@taylorrealaw.com

May 17, 2010

VIA FAX: 703-836-2021

Mr. Bruce A. McDonald
Buchanan, Ingersoll & Rooney, PC
1737 King Street
Suite 500
Alexandria, VA 22314

RE Nationstar Mortgage v. Ahmad

Dear Bruce:

Based on our conversation last Friday and the stipulated agreement to extend the applicant's testimony period, I am trying to reschedule our testimony depositions to times that are more accommodating to your desire for extensive cross examination. I have cancelled the testimony originally planned for Wednesday, May 19. We are trying to re-schedule this testimony for later in the testimony period. Tentatively, we are trying for June 9 and June 16 for Mr. Hussain and Mr. Sharieff. We will designate another day near this time for Mr. Ahmad. Once the dates are firm, I will re-notice the depositions.

Very truly yours,


Patrick I. Rea

EXHIBIT G

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

In the Matter of Serial No. 78/866376
Filed on April 20, 2006
For the Mark NATIONSTAR
Published for Opposition on January 2, 2007

<p>Nationstar Mortgage LLC, <i>Opposer</i> vs. Mujahid Ahmad, <i>Applicant</i></p>	<p>Opposition No. 91177036</p>
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NOTICE OF TESTIMONY DEPOSITION OF ZULFIKHAR SHARIEFF

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Zulfikhar Sharieff
4363 Ensbrook Lane
Dale City, VA 22193

The deponent is a person who received services from the applicant in the above captioned matter. The deposition will take place on Wednesday, May 26, 2010, in the offices of the applicant's attorney located at 3925 Old Lee Highway, Suite 200, Fairfax, VA 22030. The deposition will begin at 1 pm. The deposition will take place before a Notary Public or other officer authorized by law to administer oaths. The deposition will be recorded by audio, video and/or other stenographic means.

Respectfully submitted,

MUHAMMAD AHMAD

Date: May 13, 2010



Patrick I. Rea
Taylor & Rea, PLC
3925 Old Lee Hwy, Ste 200
Fairfax, VA 22030
(703) 385-3322
(703) 385-5406 Fax
rea@taylorrealaw.com

CERTIFICATE OF MAILING

I hereby certify that on May 18, 2010, the foregoing NOTICE OF TESTIMONY DEPOSITION OF ZULFIKHAR SHARIEFF is being deposited with the United States Postal Service, with sufficient postage as first-class mail, in an envelope addressed to

Bruce A. McDonald
S. Lloyd Smith
Bryce J. Maynard
Buchanan, Ingersoll & Rooney PC
P.O. Box 1404
Alexandria, VA 22314

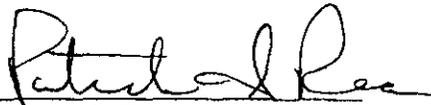

Patrick I. Rea

EXHIBIT H

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

In the Matter of Serial No.	78/866376
Filed on	April 20, 2006
For the Mark	NATIONSTAR
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<p>Nationstar Mortgage LLC, <i>Opposer</i></p> <p>vs.</p> <p>Mujahid Ahmad, <i>Applicant</i></p>	<p>Opposition No. 91177036</p>
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NOTICE OF TESTIMONY DEPOSITION OF ABID HUSSAIN

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure and 37 CFR § 2.123, Applicant, Mujahid Ahmad will take the oral testimony deposition of:

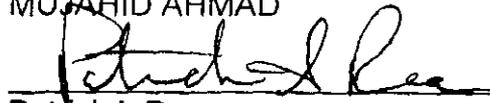
Abid Hussain
7724 Camp Alger Avenue
Falls Church, VA 22042

The deponent is a person who received services from the applicant in the above captioned matter. The deposition will take place on June 8, 2010, in the offices of the applicant's attorney located at 3925 Old Lee Highway, Suite 200, Fairfax, VA 22030. The deposition will begin at 10 am. The deposition will take place before a Notary Public or other officer authorized by law to administer oaths. The deposition will be recorded by audio, video and/or other stenographic means.

Respectfully submitted,

MUJAHID AHMAD

Date: May 18, 2010



Patrick I. Rea
Taylor & Rea, PLC
3925 Old Lee Hwy, Ste 200
Fairfax, VA 22030
(703) 385-3322
(703) 385-5406 Fax
rea@taylorrealaw.com

CERTIFICATE OF MAILING

I hereby certify that on May 18, 2010, the foregoing NOTICE OF TESTIMONY DEPOSITION OF ABID HUSSAIN is being deposited with the United States Postal Service, with sufficient postage as first-class mail, in an envelope addressed to

Bruce A. McDonald
S. Lloyd Smith
Bryce J. Maynard
Buchanan, Ingersoll & Rooney PC
P.O. Box 1404
Alexandria, VA 22314


Patrick I. Rea

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

In the Matter of Serial No.	78/866376
Filed on	April 20, 2006
For the Mark	NATIONSTAR
Published for Opposition on	January 2, 2007

Nationstar Mortgage LLC, <i>Opposer</i> vs. Mujahid Ahmad, <i>Applicant</i>	Opposition No. 91177036
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NOTICE OF TESTIMONY DEPOSITION OF MUJAHID AHMAD

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure and 37 CFR § 2.123, Applicant, Mujahid Ahmad will take the oral testimony deposition of:

Mujahid Ahmad
2001 North Daniel Street
No. 102
Arlington, VA 22201

The deponent is the applicant in the above captioned matter. The deposition will take place on June 9, 2010, in the offices of the applicant's attorney located at 3925 Old Lee Highway, Suite 200, Fairfax, VA 22030. The deposition will begin at 10 am. The deposition will take place before a Notary Public or other officer authorized by law to administer oaths. The deposition will be recorded by audio, video and/or other stenographic means.

Respectfully submitted,

MOJAHID AHMAD



Patrick I. Rea
Taylor & Rea, PLC
3925 Old Lee Hwy, Ste 200
Fairfax, VA 22030
(703) 385-3322
(703) 385-5406 Fax
rea@taylorrealaw.com

Date: May 18, 2010

CERTIFICATE OF MAILING

I hereby certify that on May 18, 2010, the foregoing NOTICE OF TESTIMONY DEPOSITION OF MUJAHID AHMAD is being deposited with the United States Postal Service, with sufficient postage as first-class mail, in an envelope addressed to

Bruce A. McDonald
S. Lloyd Smith
Bryce J. Maynard
Buchanan, Ingersoll & Rooney PC
P.O. Box 1404
Alexandria, VA 22314


Patrick I. Rea

EXHIBIT I

Patrick Rea

From: "Patrick Rea" <rea@taylorrealaw.com>
To: "McDonald, Bruce A." <bruce.mcdonald@bipc.com>; "Smith, S. Lloyd" <lloyd.smith@bipc.com>
Cc: "Ibrahim, Bassam" <bassam.ibrahim@bipc.com>
Sent: Thursday, May 20, 2010 10:59 AM
Subject: Re: Nationstar v. Ahmad
Dear Bruce:

I am certainly sorry that the noticed testimony deposition of Zulfikhar Sharieff on May 26, conflicts with the International Trademark Association meeting in Boston. This was not my intent, but is dictated solely by Mr. Sharieff's availability. If possible, I would schedule Mr. Sharieff's deposition at a time that accommodates your schedule. Unfortunately, I do not see how that can be done and I am unwilling to forego Mr. Sharieff's testimony.

Just as Lloyd Smith accommodated us when conducting the deposition of the Nationstar Mortgage corporate witness in Dallas by allowing us to participate by telephone, we will try to accommodate you. You likewise are invited to participate and conduct your cross examination by telephone. Additionally, you are welcome to send a representative to the deposition in order to observe Mr. Sharieff's testimony and participate in the deposition.

Patrick Rea
703-385-3322

----- Original Message -----

From: McDonald, Bruce A.
To: rea@taylorrealaw.com ; Smith, S. Lloyd
Cc: Ibrahim, Bassam
Sent: Thursday, May 20, 2010 5:08 AM
Subject: Re: Nationstar v. Ahmad

Patrick,
Next Wednesday is impossible - I will be at the annual meeting of the International Trademark Association (INTA) in Boston, as will every other trademark lawyer in our firm. I will be back the following Friday, May 28. I was prepared to attend Mr. Sharieff's deposition yesterday as per (1) your original notice and (2) your subsequent correspondence. I did not ask you to reschedule the date of Mr. Sharieff's deposition. If he is unavailable for the following two months except for a single day, then you should not have unilaterally rescheduled the date of his deposition. Please contact me by telephone, email, or other means of communication, as is ordinary and customary, prior to issuing another notice of deposition.
Bruce

From: Patrick Rea <rea@taylorrealaw.com>
To: Smith, S. Lloyd; McDonald, Bruce A.
Sent: Wed May 19 16:42:47 2010
Subject: Nationstar v. Ahmad

Dear Bruce:

Attached are new notices of testimony deposition for Mr. Ahmad, Mr. Sharieff and Mr. Hussain. Please note that Mr. Sharieff's deposition is scheduled for next Wednesday at 1 pm. Unfortunately, this is the only day that Mr. Sharieff is available. He will be travelling the entire months of June and July. Mr. Hussain's deposition is scheduled for June 8 at 10 am. Mr. Ahmad's deposition is scheduled for June 9 at 10 am. If necessary, Mr. Ahmad can additionally be available on June 10.

Regards,

Patrick Rea

TAX ADVICE DISCLAIMER: Any federal tax advice contained in this communication (including attachments) was not intended or written to be used, and it cannot be used, by you for the purpose of (1) avoiding any penalty that may be imposed by the Internal Revenue Service or (2) promoting, marketing or recommending to another party any transaction or matter addressed herein. If you would like such advice, please contact us.

Above email is for intended recipient only and may be confidential and protected by attorney/client privilege.

If you are not the intended recipient, please advise the sender immediately.

Unauthorized use or distribution is prohibited and may be unlawful.

EXHIBIT J

Overview

Buchanan Ingersoll & Rooney PC has more than 450 attorneys and government relations professionals. The firm's bicoastal reach provides clients with nationwide access to all of our attorneys and their respective areas of experience.

We are dedicated to building a deep understanding of our clients, their businesses and their industries, and in doing so have established industry focused client teams. Attorneys from different practice areas and geographic locations work together to understand the world from each client's perspective to address its unique needs.

The proof of our commitment to client service is in what they say about us. Buchanan was recently named on the "Client Service A-Team" for the seventh year in a row in an independent survey conducted by market research and management consulting firm BTI. The survey consisted of corporate counsel at large and Fortune 1000 companies.

Our attorneys have experience in such industries as entertainment and media, pharmaceuticals, life sciences, financial services, energy, real estate, national security, natural resources and technology. Buchanan attorneys also focus on more than 65 different practice areas including Corporate Finance, Litigation, Intellectual Property, Tax, Government Relations, Financial Institutions, Bankruptcy and Creditors' Rights, Health Care, Government Contracts and Labor and Employment.