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

IN RE; Serial No. 77/929,717  
Mark: MS. MENTHOL  
Published in the Official Gazette on June 22, 2010

X

BRITISH AMERICAN  
TOBACCO ITALIA S.P.A.

OPPOSER

V

Opposition No. 91195724

Mr. Ajmar S. Johal

And

Mr. Robert A. Casey

X

APPLICANTS' INITIAL DISCLOSURE

Pursuant To Fed. Rules Civ. P. 26(a) (1) and 37 C.F.R. Sec. 2,120(a), Applicants  
Ajmar S. Johal and Robert A. Casey ( hereinafter " Applicants") by themselves Pro Se  
hereby provide their initial disclosure.

INTRODUCTION

These disclosures are made solely for the purposes of this proceeding. Each  
disclosure is subject to any and all objections as to competency, relevancy, materiality,  
propriety, privilege, admissibility, and to any and all other objections and grounds that  
would require the exclusion of any statements made herein if any such statement were  
made by, or if any questions were asked of. a witness present and testifying in court, all



05-04-2011

of which objections and grounds are hereby expressly reserved, and may be interposed later at or before the time of trial.

Applicants have not yet completed discovery and or trial preparation. The disclosures contained herein are based on Applicants' knowledge, information and belief, at this time, and are made without prejudice to the foregoing following objections. Applicants specifically reserve the right to amend and/or supplement to disclosures herein at any time to introduce facts not contained herein if it should appear at any time or to introduce facts not contained herein if it should appear at any time that omissions or errors have been made or if obtains additional or more accurate information. Applicants further reserve the right to rely upon such facts and persons having knowledge of such facts, as may be derived through future discovery or through their continuing investigation in this matter as may be adduced at trial.

#### DISCLOSURES

##### 1. Individuals with discoverable information

The individuals likely to have discoverable information that the Applicants may use to support their claims and defenses include, but are not limited to:

- A. Mr. Ajmar S. Johal may be reached at 28 Frederick Street, Carteret, NJ, USA 07008 and has information about all aspects of the Applicants' trademarks.
- B. Mr. Robert A. Casey may be reached at 52 Woodview Drive, Howell, NJ, USA 07731 and has information about all aspects of the Applicants' trademarks.
- C. Experts not yet identified

Identification of the above persons does not waive any privileges or work product that may apply to information possessed by them. Applicants reserve all rights to disclose and use additional information and witnesses as their discovery and investigation proceeds.

11 Categories of Documents in Applicants' possession that it may use to support its Claims or Defenses.

A. The documents, not privileged or protected from disclosure, reasonably available to Applicants;, which Applicants' may use to support its claims or defense include all aspects of the Applicants' trademarks. Unless otherwise indicated, all documents are in the possession , custody or control of Applicants. The address where such documents and information are likely to be found is c/o Mr. Robert A. Casey,32 Woodview Drive, Howell , NJ, USA 07731

B. Documents and/or tangible things to be obtained from Opposer, concerning Opposer's trademarks.

Applicants reserve all rights to disclose and use whatever additional evidence comes to its attention as its discovery and investigation of these matters proceed

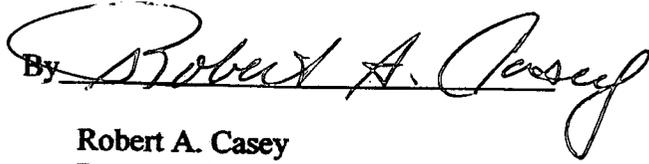
111 Damages Calculations

Not yet available.

1V Insurance Agreements

At the time of this initial disclosures exchange, Applicants' are not aware of any insurance agreements.

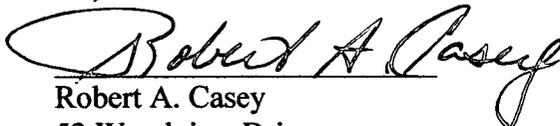
Respectfully Submitted<

By  Robert A. Casey

Robert A. Casey  
Representing Applicants Pro Se  
52 Woodview Drive,  
Howell, NJ, USA 07731

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT A TRUE AND COMPLETE COPY OF THE FOREGOING APPLICANT'S INITIAL DISCLOSURE has been served on OPPOSER, by mailing said copy on 2 May, 2011 via Priority Mail, postage prepaid, to OPPOSER'S counsel of Record, Paolo A. Strino, and Michael N. Mercanti, LUCAS & MERCANTI, 426 Park Avenue South, New York, 10016



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